

**Question from FCC (October 1<sup>st</sup>, 2010):**

What is the main purpose of this class II change? Please add the grant comments/note. Additional cover is not required anymore to meet RF Exposure requirements (please be more specific).

**Answer:**

Please let me explain the situation and the purpose of this Permissive Change Class 2.

According to earlier discussions with the FCC, FCC considers an eBook Reader as a device, which also can be used directly in touch with the body (lap position) and therefore RF Exposure Evaluation is required.

Since our eBook reader was not able to pass the FCC SAR requirements when measured without any separation distance, Sony began to ship an additional cover with each device, which must be attached during the use to provide a small separation distance to the body, so that always this small distance is secured. The device fulfilled the SAR measurements at this distance.

However, according to FCC's newest suggestions for eBook readers, it is possible to prove that no SAR evaluation is required, when it is shown, that the duty cycle of such a device is normally very small. The Upper Bound Transmission Duty Factor Calculation document, which was uploaded together with this Permissive Change Class 2 shows that this applies for our device. Therefore an additional accessory is not required for use anymore and Sony can sell the device in the future without this cover and statements about this accessory in the user manual.

The calculation document was already checked by Mr. Kwok Chan, who presented this new procedure on the last TCB Council Workshop in Baltimore.

Please find also below our proposal for the grant notes / Comments.

**Grant Notes / Comments:**

*PCII to allow the usage of the device without special accessories.*

*Output power is ERP for Part 22 and EIRP for Part 24.*

*The device is approved for use in portable exposure conditions (2.1093). This transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.*

*Transmission for this device is limited to purchase transactions only.*