

A. User manual 47 CFR §2.1033 Application for certification.

(c) Applications for equipment other than that operating under Parts 15 and 18 of the rules shall be accompanied by a technical report containing the following information:

(3) A copy of the installation and operating instructions to be furnished the user. A draft copy of the instructions may be submitted if the actual document is not available. The actual document shall be furnished to the FCC when it becomes available.

B. This portable is delivered by the authorized Kenwood dealer to the end- user supplied only with one antenna.

The supplied draft user manual mentions three antennas to be delivered while the SAR report mentions 7 antennas.

That is correct, there are three types of antennas, two each with three freq ranges, one is broadband, thus a possibility of seven model antennas.

The SAR reports suggests that the antennas are frequency dependent and that evaluation was only performed for each antenna at specific frequencies. The user manual should be updated to provide consistent training instructions for use of the antennas.

The evaluations were performed at the correct freq range for each antenna.

That is the tuned range of the antenna with the best transit and receive characteristics as designed; best RF radiation and best (resonant) receive capture.

There are three stubby antennas; Fl, Fm , Fh, three whips at Fl, Fm & Fh, and a broadband antenna.

The separation distance in the training information is the worst case, 3 cm distance at 50% duty cycle.

If the "wrong" frequency range antenna is used, the TX radiated power is reduced due to antenna mismatch and further due to VSWR protection in the transmitter.

The worst case RF near- field energy level is achieved by employing the correct, resonant antenna.

Use of an incorrect off- resonance antenna reduces the RF exposure hazard, along with system performance, both in the receive and in the transmit operating mode.

Further instructions in the User Manual to the end- user to the effect that using the wrong antenna will degrade system performance would not provide useful information to prevent increased RF exposure hazard. It is the obverse; the hazard is reduced by using an off- resonant antenna.

I trust the forgoing information will clarify the two questions posed by the FCC OET Examiner(s).

Thank you & Regards,  
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