



February 3, 2012

TIMCO Engineering, Inc.  
849 NW State Road 45  
P.O. Box 370  
Newberry, Florida 32669

Re.: Letter of Explanation for Uniden Model D3580 1.9 GHz UPCS Cordless Phone – Handset Unit SAR exemption

FCC ID: AMWUN405R  
Product Type: 1.9 GHz UPCS Cordless Phone – Handset Unit

To Whom It May Concern:

**UPCS DECT 6.0 Cordless Handset SAR exemption for FCC TCB Certification under Part 15D:**

These handsets operate at a very low source-based time-averaged duty cycle with a typical source-based time-averaged output power of < 6 mW. For FCC TCB Certification of these handsets, SAR testing has been excluded since the maximum source-based time-averaged output power is < 60/f mW per it operates with a maximum of 1 TDMA slot out of the 24 total slots. This document serves as the RF exposure exhibit in the FCC Form 731 application in lieu of a SAR report and has been reviewed and accepted by the FCC prior to submittal to the TCB.

**Operational Description:**

Above mentioned model is a DECT 6.0 Cordless Handset. It operates at frequency range of 1920 to 1930 MHz with 5 channels.

**RF Exposure Conditions:**

The Handset is intended for use in the portable exposure condition and the General Population / Uncontrolled RF exposure environment.

**Transmission Mode:**

This DECT 6.0 Cordless Handset utilizes a DECT wireless communication technology with a maximum of 1 TDMA slot out of the 24 total slots.



**Duty Cycle:**

DECT 6.0 Cordless Handset operates with a maximum of 1 TDMA slot out of the 24 total slots. The length of time for each single slot is 416.7 $\mu$  Seconds and the 24 total slots is 10m Seconds as a transmission period.

**RF Output Power:**

Tx frequency range: 1920 – 1930 MHz

Antenna-to-tissue phantom separation: 2mm

Maximum Output Power: 19.1 dBm (81mW)

Maximum Duty Factor: 4.16%

$60/f(\text{GHz}) \text{ mW} = 31.17\text{mW}$

Source-based time-averaged conducted output power is  $3.470\text{mW} = < 60/f$

Please contact the undersigned if you have any questions or need any further information regarding this matter.

Regards,

A handwritten signature in blue ink, appearing to read "Jon Suehiro".

Jon Suehiro  
Manager, Engineering and Regulatory Affairs