To: Richard McMurray,
From: Stan Lyles
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FCC Application Processing Branch

Re:	FCC ID ATH2424140
Applicant:	E F Johnson Company
Correspondence Reference Number:	28401 **AND** 28405
731 Confirmation Number:	EA601124

PLEASE NOTE: We received two correspondences for this FCC ID#, reference #'s 28401 and 28405, with the same exact questions, on the same day. This response and associated documents uploaded should be considered to address both correspondences. If this is not acceptable, please advise as soon as possible.

1) Please justify that the RF exposure warning label is easily viewable by a user in its current location.

Response: The RF Exposure warning label is located on the metal surface of the radio in the battery compartment. The radio is shipped with the battery removed. When the battery is initially installed, or when the battery is changed, the label is viewable. In addition, the location of the label is such that when the battery is installed, the user's attention is drawn to the area of the label, as that is the location for initial insertion of the battery. Due to the physical nature of the portable, it is impractical to locate a label of that size on the external surface of the product.

2) The FCC believes the SAR tests performed contain factors that significantly increase measurement uncertainty. Firstly, the large power droop in the device under test produces a dynamic SAR distribution. The SAR measurement system used appears to assume a constant distribution. To determine if the SAR values provided are conservative please perform one additional tests 1) a SAR test using an external power supply to supplement the batteries. Please use shielding and ferrite current dampeners on any wires used. or 2) A test starting after the output power has stabilized (+100 seconds), the SAR value should than be scaled up to full power. Tests in the worst case configuration for both head and body are considered sufficient.

Response: Please refer to the additional SAR data uploaded with this response.

3) Please provide maximum duty cycle for the data mode.

Response: The duty cycle for data operation is typically low, as the primary usage is for Over The Air Rekeying (OTAR) or other short data bursts. Typical data operation is well below 50% transmit duty cycle.

4) Your RF exposure instructions in the user manual state "If you are not using a body-worn accessory and are not using the radio in the intended use position in front of the face, then ensure the antenna and the radio are kept at least one inch (2.5 cm) from the body when transmitting." To support this statement please test with a 2.5 cm gap under body worn conditions.

Response: Please see the revised manual uploaded with this response.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.