

To: Bruno Clavier, Rhein Tech Laboratories Inc.
From: Andy Leimer
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FCC Application Processing Branch

Re: FCC ID AXATR-420-A2
Applicant: Ericsson Inc
Correspondence Reference Number: 22017
731 Confirmation Number: EA780492

1) The User's Manual states a 20 cm separation distance.(page 31) "to a normally occupied location." The MPE exhibit says 27 cm. Correct the phrase to "to a normally occupied location or person." Submit the corrected page of the User's manual.

[Correction made and revised manual attached](#)

2) The User's Manual has information for cell phones on page 33. This is not a cell phone so remove this and submit a corrected User's manual.

[Correction made and revised manual attached](#)

3) The MPE analysis was based on 30 minute averaging. Part 2.1093(d)(2) says that this is not permitted. Please address this issue.

[Our analysis is based on a mobile device. For this reason we referenced Part 2.1091\(d\)\(2\) for radiation exposure evaluation.](#)

[Maximum Exposure Analysis](#)

[In our maximum exposure analysis, we provide descriptions of our Class I burst modem and our Class II continuous AMPS mode. For the Class I burst modem, we used the mobile unit's source-based time averaging which as described has a duty cycle of 18.1% over 41.5 seconds total period. This duty cycle is inherent to the device and can not be extended by the user. The Class II AMPS mode is continuous. Therefore, a 1/1 duty cycle was used for this analysis, and a distance from the radiating device to any person of 27cm was specified.](#)

[We are including a new Exhibit 11 with the calculations performed as mentioned above](#)