

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