

4/23/2013

Dear FCC LAB Staff

Re: Correspondence Ref. # 146140

SUBJECT: FCC ID: BBOMRHH500

APPLICANT: Cobra Electronics Corporation

From: Timco Engineering

Reply to Questions That Follow:

Tim Harrington

From:

Tim.Harrington@fcc.gov

BBOMRHH500

Re: FCC ID:

Cobra Electronics Corporation

Applicant:

146140

Correspondence Reference Number:

TC366850

Form 731 Confirmation Number:

04/22/2013

Date of Original E-mail:

This corresp. replaces and repeats the text from the preceding sent March 13. TCB please coordinate for addressing this matter no later than 12pm US eastern time May 8 2013, or grantee code might be subject to e-filing system restrictions.

Repeat of March 13 text:

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FCC: For filings after Jan. 1, 2013 TCB must ensure that latest versions of SAR procedures are applied, or must do pre-filing request for special exception and with suitable justifications.

Reply: SAR Testing according to the submitted Test Reports took place between December 12, 2012 and December 17, 2013. Prior to this time, a similar application was made and reported per correspondence to TCB KDB: 389795 and suggestions from the FCC dated January 3, 2013. That communication took place between December 5, 2012 through January 4, 2013. What had occurred was a delay due to correspondence and the final response taking place in January 4, 2013.

Timco Engineering filed an Inquiry asking permission to proceed with pre 2013 regulations since the device had been tested in December 2012 with completion by December 17, 2013. Timco Engineering, recalling this application, acted in a similar way since a long Inquiry had taken place between the SAR Laboratory and the FCC OET personnel.

At this time we must apologize for the error made in not submitting a PBA for this identical device. Alternate Timco Personnel were involved and the PBA Inquiry was not addressed at it should have been. Timco Engineering is well aware of this procedure and would not have continued review without a response from the FCC to this PBA.

The lengthy communication involving this application was per FCC Tracking Number 389795. It appeared at the end of this communication period that a resolution had been reached instructing the SAR Test Laboratory how to adjust for 300 MHz hardware to meet the 150 MHz test results accurately. The dialog regarding testing appeared to end stating SPEAG did not have 150 MHz shielded loop antennas available until at least March. Therefore, we proceeded to review the data per instructions in KDB 865664. Due to the length of correspondence, the final instruction to proceed and submit a PBA first was missed. Timco Engineering will make certain this does not happen again. Review per 865664 proceeded as the previous review stated earlier. The testing and resulting data was accepted since being accurately presented. Since the device is electrically identical to the previous model, the similarities were obvious. We believe the FCC agrees.

FCC: Per KDB pub 865664 D01 v01 "freq-below-300 MHz procedures, both head and body 300 MHz dipole tests are needed for establishing sys. verif. targets for 150 MHz band head and body testing."

Reply: The guidelines presented in KDB 865664 were addressed throughout with definitions made very clearly. Moreover, the results were identical to FCC ID: BBOMRHH350, an electrically similar model of this transmitter under test. Based upon the results, we are certain the KDB 865664 methods gave accurate SAR Test Results.

FCC: Please explain how TCB processing has ensured that uniform procedures were followed, as required per 47 CFR 2.962, or amend filing where appropriate.

Response: Timco Engineering is Certified per ISO/IEC Guide 65. Timco Engineering is one of the original TCBs authorized to review documents on behalf of the FCC. The Staff at the FCC OET knows by name the engineers doing reviews of the many different products. Our people attend all of the TCB Council Meetings in both April and again in October. The Timco Engineers often submit Inquiries when needed. The FCC OET Staff has been very diligent and answer questions promptly. Thank you for your assistance over these many years Mr. Harrington. Please know it is greatly appreciated.

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Similarities of this Product:

Cobra – FCC ID: BBOMRHH350, Model #: MR HH350 (Granted 12/27/2012)
Handheld marine transceiver – 156.025 – 157.425 MHz. Testing done on model MR HH500 and, model MR HH350.

MR HH500 and MR HH350 are identical – except the MR HH500 has a BT module in it. Grant was issued on 12/27/12 for the BBOMRHH350.
Output Power is similar to previous model, SAR Face-Held and SAR Body-Worn have similar values.

SAR TEST REPORT: Reference FCC SAR Probe Calibration and System Verification Considerations for Measurement at 150 MHz – 3 GHz : KDB 450824 D01 stated; as is KDB 865664 D01.

Cobra – FCC ID BBOMRHH500, Model #: MR HH500

This radio is the MRHH350 with a BT in it. Cobra chose to use a new FCC ID for this model submitted using similar SAR report as MR HH350: Grant issued 2/15/2013.

Thank you for your help with this application. We apologize again regarding missing the submission of the PBA. Hopefully SPEAG will make available their 150 MHz shielded loop antenna. This has become a necessary item for SAR Testing.

Please be aware that if additional SAR testing is required, Celltech has notified us that their SAR Probe is out for calibration and will not be returned until May 7, 2013.

Based on these findings, please let us know what is necessary to complete this application. As requested from you, we will submit what is needed as quickly as possible. The SAR Test Laboratory is also eager to help complete this application and supply what is requested from the FCC. Thank you for your help, it is appreciated.

Respectfully submitted,
Timco Engineering