

American Telecommunications Certification Body Inc. 6731 Whittier Ave, McLean, VA 22101

November 27, 2008

RE: Shure, Inc.

FCC ID: DD4UR1HC

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

From our last RT, there appears to remain some unaddressed issues:

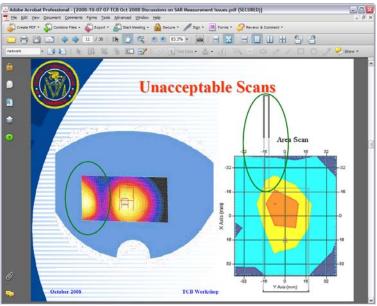
- 1) Please confirm the correct parts list was provided. It is noted that there are A, B, and C Hardware Groups associated with different designs. The EUT provided is for Hardware group denoted as C, but the parts list states it is for a variant A. It is unsure if variant vs. hardware group are related. Please confirm. Shure has the notation "var A" on the Parts Lists as internal documentation of the Parts List version. The hardware does not change based on the frequency allocation of the unit.
- The RF exposure exhibit for mobile has a few concerns. a) The power used is > maximum given in this application (357 mW vs. 222 mW). b) The exhibits mentions SAR is not necessary. However at >= 20 cm we are not interested in SAR, but RF exposure evaluation. c) The power used in the equation does not appear to match either the application or exhibit information shown. d) the equation mentions W, but may need to be mW. Please review.

## See updated RF Exposure Statement and updated Test Report.

SAR Related

- 3) Section 10:
  - a) the average SAR values on page 16 do not appear to match (section 10.2 compared to 10.3/10.4). This may affect the calculations (deviations). Please review.
  - b) Tables in 10.2 mentions 608 MHz? should this be 668 MHz?
  - c) Average SAR calculates out properly in 10.3/10.4 for page 16 but page 17 doesn't appear to calculate properly. Please review. See updated test report.
- 4) Test equipment list does not appear to show 668 tissue fluid. Please explain. Have added the 668 MHz tissue to the Test Equipment list.
- 5) It does not appear that the phantom was big enough to encompass the entire antenna and unit at the same time. Was additional positions investigated to ensure additional hot spots along the antenna were not missed? The following are recent FCC issued concerns:

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Note: FCC has issued concerns such as the following on other recent applications:

SAR plots for all positions indicate the antenna has not been included in the SAR measurement; these positions need to be repeated with substantially larger area scans to include both the antenna and the DUT; when there are multiple hot spots, multiple zoom scans are needed; Note: phantom is \_\_\_\_\_ cm; therefore, may need to adjust DUT & antenna so that both are toward center of phantom away from the phantom side walls when conducting SAR measurements. The unit was evaluated further up the antenna; however, due to the angle of the antenna moving further away from the phantom, the SAR value was much lower.

6) It was not clear from the photos provided if the microphone was attached during testing despite the text of the document states it was attached the photos do not appear to support this. This is expected to be attached during SAR as it is an accessory that does contain metal and can affect the results. The accessory was attached for all tests. The microphone was in the Front View picture, but it is located on the other side of the antenna. The small black bump below the antenna is part of the microphone connector.

ustih

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.