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December 6, 2008

RE: Shure, Inc.

FCC ID: DD4UR1HF

Responses to the SAR portion of comments issued on December 1, 2008.

- 5) Test equipment list does not appear to show correct tissue fluid. Please explain. I have revised the report (Rev. B) to include the correct tissue fluid.
- 6) FCC asks that liquid dielectric parameters and temperature measured at device mid-band frequencies. It does not appear this information was provided. Per FCC KDB 450824, at 300 MHz to 3 GHz, measurements should be within \pm 100 MHz of the probe calibration frequency. Measurements exceeding 50% of these intervals should follow these additional steps. (1) When the actual tissue dielectric parameters used for probe calibration are available, the differences for ϵ_r and σ between probe calibration and routine measurements should each be \leq 5% while also satisfying the required \pm 5% tolerances in target dielectric parameters. The measured band was \geq 50% of the interval-causing item one to be used. Based on the values in the calibration certificate and the values used for the testing, the dielectric parameters were within 2% of the values used for calibrating the probe and within 3% of the target values. This allows the use of the target values and calibration at 900 MHz for this device.
- 7) 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 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.
- 8) It is uncertain what the frequency span coverage of the validity of the probe correction factor is. The calibration certificate does not provide sufficient information to support it covers the band in which it was used here for measurements. The validity of the probe is \pm 10% for 915 MHz and below and \pm 5% for above 915 MHz.
- 9) 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 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.