

Tri Luu

From: "LabHelp" <LabHelp@fcc.gov>
To: "McCarthy, Dennis" <DMcCarthy@microwavedata.com>
Sent: Thursday, July 29, 2004 7:21 AM
Subject: RE: FCC part 90 question

Question:

Why can't you grant portable approval on this part 90 device - this is such a low duty cycle and output power that it does not make sense to allow mobile and fixed but not portable? This may be because of the FCC rules 2.1093 SAR concerns, but I think our SAR exemption is grounds to allow portable approval for this module.

Answer:

FCC has relatively well-defined modular approval procedures mainly for Part 15 devices, which have specific antenna(s) included as part of the certification. Licensed service devices are generally not certified with specific antennas, and certain licensed service portable devices do submit SAR evaluation for each configuration. Approval for portable use of E5MDS-ROR220 in certain well-defined configurations may be possible, but requires an interpretation of the licensed module review and approval procedures. Depending on details of the operating configurations and exposure conditions for the "operator control unit," it may be possible to append the grant notes through a Class II permissive change filing not with TCB but directly with FCC to allow interpretations. Such application should include details of typical or preferably specific operator control units, and full details of source-based time-averaging for the module.

Fyi one early example of licensed module guidelines is at FCC/OET Interpretations Database link

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<http://hraunfoss.fcc.gov/eas_public/SilverStream/Pages/pg_html_fts_res.html?letter=426>
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