May 7, 2013

Chief, Equipment Approval Services
Federal Communications Commission
P.O. Box 358315
Pittsburgh, PA 15251-5315

RE: FCC ID EZSDEI6816

Dear Sir or Madam:

The following is the SAR calculation for the EUT filed under EZSDEI6816 using the system's maximum RF emissions. The calculation is based on FCC 47CFR Part 2 and OET 65.

Per OET 65:

Maximum permissible exposure is the Freq. (MHz) ÷ 1500 = MPE/cm²

923.835MHz (highest used freq.) ÷ 1500 = 0.6123mW/cm²

The following equations determine the distance from the antenna that the power density is ≤ 0.6123mW/cm².

+19.25dBm Transmitter Power (Max)
0dBi Antenna Gain (Max)
+19.25dBm + 0dBi = +19.25dBm EIRP
+19.25dBm EIRP = 84.14mW EIRP
0.6123mW/cm² = 84.14mW ÷ (4 x π x r²)
r = SQR(84.14 ÷ 4 x π x 0.6123)
r = 3.31cm

We would like to emphasize that this device is a hand held remote control for vehicle security and convenience systems. The typical use is for unlocking/locking door locks, activating a car alarm or remote starting the vehicle. We estimate that the typical user will activate the remote about 20 times for a period of 2 seconds on average in a 24 hour period. Therefore, the exposure risk to the user is further minimized by the very low duty cycle of on time of the device.

In addition, the following statement will be added to our installation/operation manual:

To satisfy FCC RF exposure compliance requirements, this device should be used in hand-held, hand-operated configurations only. The device and its antenna must maintain a separation distance of 20cm or more from a person's body, except for the hand and wrists, to satisfy RF exposure compliance.
This device is designed to be used in a person's hands and its operating configurations do not support normal transmissions while it is carried in pockets or holsters next to a person's body.

Sincerely,

Minas Minassian
Sr. director, hw/rf systems