



Tim Dwyer <rfpectrum@gmail.com>

Response to Inquiry to FCC (Tracking Number 773979) (TCB)

1 message

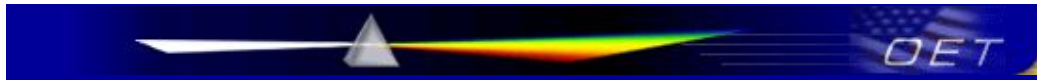
oetech@fccsun27w.fcc.gov <oetech@fccsun27w.fcc.gov>

Thu, Jan 24, 2013 at 2:00 PM

To: "LST.FRE.Cert Notice" <LST.FRE.CertNotice@ul.com>, "Dwyer, Timothy" <Timothy.Dwyer@ul.com>



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Office of Engineering and Technology

Inquiry on 01/23/2013 :

Inquiry:

This KDB is being submitted specific to FCCID: GKR-TP00042AHJ, COMPAL ELECTRONICS, INC. requesting consideration to grant according to the previous KDB versions and original KDB guidance which would allow approval without additional PBA. The circumstances for this application are identical to the circumstances described in KDB 821253.

Following information is provided in the same context.

1Q. The TCB process must have been started prior to January 1, 2013. This means that the TCB must have received a complete application package prior to that date. All, or substantially all, of the subject tests must have been completed by January 1. We may accept test dates after January 1, if the tests were done at the request of the TCB due to insufficient or deficient testing the original submittal.

1R. The TCB received the C2PC application on Nov 02, 2012. There were several rounds of questions related to unresolved issues from the original grant PBA and an OET audit that was pending for the original grant. TCB determined it was not possible to act on the C2PC until all issues from the original grant were reconciled. Final questions were sent to the applicant on Dec 17, 2012 with additional clarification on Dec 19, 2012. The final questions were to resolve some minor administrative issues and omissions from the RF reports, and did not impact the SAR or proximity sensor evaluation. TCB anticipated a quick response with

adequate time to grant prior to Dec 31, 2012. Copy of email Dec 19 and response Jan 07 is attached.

2Q. TCB needs to provide copies of the correspondence between the TCB, test lab, and/or manufacturer demonstrating why the application could not be filed by January 1.

2R. Applicant did not respond to the Dec 17/19 questions until Jan 07, 2013. Applicant has provided the following additional explanation for the delay: Description: https://ssl.gstatic.com/ui/v1/icons/mail/profile_mask2.png

Tsou,
Chi

Description: <https://mail.google.com/mail/u/0/images/cleardot.gif>

Description: <https://mail.google.com/mail/u/0/images/cleardot.gif>

Description: <https://mail.google.com/mail/u/0/images/cleardot.gif>

to Timothy, Claire, Aliza, Mark

Description: <https://mail.google.com/mail/u/0/images/cleardot.gif>

Hi Tim,

Here is the client's explanation of the response delay:

As you know, BV ADT updated the test report on 12/19 but some portions still need to modify after reviewing by CCS on 12/20/2012.

We informed BV ADT again to update the report. However, there are many people were on vacation in the end of 2012 so it had communication missed until the beginning of Jan.

Please address our apology to FCC for late reply and hope to get FCC grant ASAP.

Thanks and regards,

Chi

3Q. TCB needs to provide a justification for the exception, e.g., unreasonable number of additional tests, significant delays, etc.

3R. Justification for the exception are additional tests required by the new KDB?s and resultant delay. The new KDB?s would require re-measurement of SAR and proximity sensor operation, and would also require PBA (additional delay) which would not have been required before Jan 01, 2012 due to original KDB guidance having been applied.

FCC response on 01/24/2013

Exception to using new RF exposure KDBs is approved. This approval is per FCC ID and case by case.

Consequently, a PBA is not required for this C2PC if the changes do not affect the PBA issue and all prior PBA guidance is still fully applicable. See Special Circumstance 1) Permissive Changes in KDB 388624 D01 for detail guidelines.

Attachment Details:

[20130107 Response by Applicant to 20121217 Questions](#)

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