Assessment Notes by BABT as TCB for WWC107C Wrist Computer

For Symbol Technologies Inc under FCC ID number H9PWWC107C

BABT file number US/000030

I have reviewed the TÜV-PS test report WS601739 in respect of the above product and I have the following comments:

FCC ID on front cover is H9PWSS107C but inside report it is H9PWWC107C. FCC ID for this application is declared to be H9PWWC107C.

Attestation states that partial body limits for occupational/controlled exposure are 8.0W/kg. This is correct but for extremities (Hands, wrist, feet, ankles) for general population/uncontrolled exposure the limits is 4.0 W/kg averaged over 10g. These are more applicable for this kind of device if special training is not provided to the user. It is also noted that the device is battery powered and exposure times are hence limited to the life of the battery.

Max SAR value obtained is shown in third table page 6 and figure 11 as 0.720 W/kg averaged over 10g.

Note on bottom of third table on page 6 is incorrect. However, device meets correct limits.

The expanded measurement uncertainty is shown on page 10 at 23.47%, which is acceptable for this kind of measurement.

Important note to FCC reviewer:

This device is a wrist worn computer used for bar scanning applications. The maximum measured SAR level is 0.720W/Kg for 1g averaging, which is well less than the limits for extremities for the general population, which is 4.0W/kg averaged over 10g. No special training is required to use the device to limit RF exposure therefore this equipment has been handled as a general population device even though in practice it is for professional use. This maximum SAR is obtained at a distance of 0cm from the user. In practice the user will always use a wrist-strap, which contains no metal parts and maintains a distance of 1.5cms from the users wrist when the max SAR value is 0.193W/kg. It is viewed that this device when reviewed very conservatively DOES MEET the SAR requirements for extremities for the general population even allowing for worst-case measurement uncertainties.

I confirm that I have undergone SAR awareness training by the FCC at the TCB Council workshops in August 2001, February 2002, April 2002 and October 2002.

Alan Binks
Certification Manager, BABT
5th March 2003