RE: Compliance with SAR requirement for the NetLink phone.

After discussing the performance of the NetLink phone with personnel at one of the Laboratories which perform the SAR test, We were advised that this particular product does not require a test for SAR. The peak power output of the device, as listed in the test data is indeed 100 mW (+20 dBm), and is a direct sequence spread spectrum signal. It however operates in a packet mode with the following burst and repetition rates. This transmitter duty cycle results in a lower average power due to source based time averaging of the transmitted signal. Please consult the following table.

Data Rate	TX on time	Duty Cycle	Average power
1 MB	1.57ms	7.85 %	7.85 mw
2 MB	1.00 ms	5.00 %	5.00 mw
5.5 MB	0.64 ms	3.20 %	3.20 mw
11 MB	0.54 ms	2.70 %	2.70 mw

The duty cycle is derived from the burst duration (TX on time) divided by the repetition rate (always 20 ms)

The average power is the duty cycle times the peak power of 100 mw (20 dBm)

From the above table, the worst case average power developed is 7.85 mw (8.95 dBm) From this power level, it is not believed that this instrument will pose a safety risk from excessive SAR.

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