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副本抄送：
主旨： Response to Inquiry to FCC (Tracking Number 673863)

2007/01/11 07:39 AM

Inquiry:

Dear Sir,

We are Compliance Certification Services Inc., a testing lab in Taiwan. We are going to file a submission to TCB which is subject to the item#6 of permit-but-ask procedure and product information are as below:

FCC ID: JNF-Z-107X

The above FCC ID device (**Portable Data Terminal**) is a handheld device and it does not have voice function. The normal operation of the device is handheld without head/body-worn position. Therefore, we, Compliance Certification Services Inc., hereby confirm that SAR measurements are exempt from testing.

Please comment, thank you.

Amanda

Response:

Thank you for your inquiry, which appears to describe a hand-held hand-operated only final product containing part 15 transmitter(s), operating in portable RF exposure conditions relative to user's hand and mobile RF exposure conditions relative to most other parts of persons' bodies. Based on description, and below notes, permit-but-ask and SAR evaluation do not appear to be applicable.

FYI here again is related context from Oct06 and Oct05 FCC-TCB conference notes:

Concerning SAR in hands, wrists, feet, and ankles:

- Compliance issues are not expected, and SAR testing is not requested, for most present handsets and transmitters in consumer notebook and tablet computers
- Higher SAR limit
- Devices typically have SAR compliance info for other normal-use positions
- Uniform SAR test and TCB review & approval procedures have not been established for hands, wrists, feet, ankles exposures
- TCBs and/or applicants should contact FCC Lab before submitting new or evolved types of product configurations and technologies which have only hands, wrists, feet, or ankles normal-use position
- Wireless-PDA generally hand-held-only PORTABLE device (wrt hand, extremity SAR limit higher) operating at 20 cm from the body (mobile wrt body)
- When submitted by applicant's choice, wireless-PDA lap-held SAR data is reviewed for compliance
- User instructions may be appropriate for wireless-PDA lap-held or in-pocket incidental transmitting conditions, or SAR evaluated by applicant's choice

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