

From: Desmond Fraser  
Sent: Tuesday, January 30, 2001 10:55 AM  
To: Bruno Clavier  
Cc: Missy Fleming  
Subject: FW: Information requested

desmond@rheintech.com;dfraser@palm.net; www.rheintech.com;  
Rhein Tech Laboratories, Inc.  
Electro Magnetic Engineering and Testing,  
Wireless Testing, Electrical Safety Testing,  
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-----Original Message-----

From: OET [mailto:oetech@fccsun07w.fcc.gov]  
Sent: Monday, January 29, 2001 2:35 PM  
To: Desmond Fraser  
Subject: Information requested  
To: Desmond Fraser, Rhein Tech Laboratories, Inc.  
From: Errol Chang  
echang@fcc.gov  
FCC Application Processing Branch  
Re: FCC ID K66VX-900V  
Applicant: Vertex Standard Co., Ltd.  
Correspondence Reference Number: 17884  
731 Confirmation Number: EA99480

1. There is an abrupt discontinuity in the SAR distribution indicated on the plot for 161 MHz body-worn SAR (the one with 3.3 W/kg). The is not normal and appears to indicate the output power has been disrupted during the SAR. Please verify and if necessary, repeat the SAR measurement.

Addressed from Celtech

2. The dipole validation results submitted are for 835 MHz, which is substantially different than the operating frequency of this device (150 MHz), please clarify and provide appropriate dipole validation results to confirm system measurement accuracy and to ensure the E-field probe is properly calibration.

In progress will come from Celtech directly with Kwok Chang / Measurement Uncertainty

3. The SAR results submitted for this filing indicates this device only meets occupational exposure limit. It does not comply with general

population exposure limit. In order for this device to qualify for occupational exposure limit, users must have the appropriate training so that they will have the knowledge to control their exposure conditions and duration to satisfy the higher occupational exposure limit. The submitted RF exposure info for the manual is insufficient. Please submit the specific training info for satisfying occupational exposure requirements. For training info to be placed in the manual, a caution/warning label should be placed on the device, visible to the users, directing them to the specific training info in the manual. Please upload relevant pages of this training information.

From Mikio

4. Please provide a photo or clear illustration showing exactly where this RF exposure label will be located on the device. (See #7 below)

5. The RF exposure info on the label should be in the form of a CAUTION statement, indicating that this device must be limited to occupational use and users must follow the training information specified in the manual for meeting FCC RF exposure compliance requirements. The RF exposure label can be a separate label but it should be visible to all persons operating with this device. Please specify the font size and label size. (See #7 below)

6. The training information in the manual should include warning/cautions statements to alert users that this device is not approved for use by the general population as it only meets the higher exposure limit for occupational use, including an applicable duty factor. It should also clearly state that users are required to have appropriate training to control their exposure condition and duration to satisfy the higher occupational exposure limit before using this device. (See #7 below)

7. As an example of RF exposure label and training info requirements, please review a recently approved filing of a similar transmitter under FCC ID: OWDTR-0006-E, on how to revise the info required for this filing.

Note: Output measured at 4.79 W ERP

Proposed Grant Conditions - Output is ERP. This transmitter has been tested for SAR compliance in Push-to-Talk and body-worn operating configurations. Body-worn SAR compliance is limited to the specific belt-clip tested for this device.

This device must be restricted to work related operations in an Occupational/Controlled RF exposure Environment. All qualified end-users of this device must have the knowledge to control their exposure conditions and/or duration to comply with Occupational /Controlled SAR limit and requirements. A label, as described in this filing, must be displayed on the device to direct users to specific training information for meeting Occupational Exposure Requirements and users must be provided with the training information. The highest reported SAR values are - Head: 0.98 W/kg; Body-worn: 3.3 W/kg, both tested at 100% duty factor

The items indicated above must be submitted before processing can continue on the above referenced appl

ication. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 © and forfeiture of the filing fee pursuant to section 1.1108.

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Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.