

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). This 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.

[Celtech addressed directly to Kwok Chang](#)

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 calibrated.

[In progress will come from Celtech directly with Kwok Chang / Measurement Uncertainty](#)

3. The SAR results submitted for this filing indicate 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.

[Caution label uploaded. Training manual has been uploaded 1/25/2001 prior to request.](#)

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

[Caution label uploaded 2/1/2001](#)

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)

[Caution label uploaded 2/1/2001](#)

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)

[Uploaded prior to request 1/25/2001](#)