



Dayton Street, Suite 205  
Edmonds, WA 98020-3581

425 771-4482

425 486-1933 Fax

August 11, 2008

Northwest EMC, Inc.  
TCB Committee  
22975 NW Evergreen Pkwy, Suite 400  
Hillsboro, OR 97124

Re: RF Safety Evaluation

Gentlemen,

No SAR measurement data is submitted with this application for KBCIX-WL3945, WLAN in the IX750, configured with the KBCIX-MC8775, WAN and KBCIX-EYXFDC, Bluetooth radios. The WAN and WLAN radios do not transmit simultaneously, applicable SAR reports are on file as part of the original Certification exhibits. The WLAN and Bluetooth transmitters do transmit simultaneously. The power output of the Bluetooth is <5 mW and stand alone SAR is not applicable. However, the Bluetooth and AUX WLAN antenna are within 2.5 cm.

Jon Hughes of Celltech Labs, Inc. initiated an inquiry with the FCC to obtain guidance for this specific device and physical configuration under KDB 205074, to determine if SAR testing was applicable to the co-located/co-transmitting WLAN and Bluetooth radios.

The FCC procedural guidance was to follow the procedures of KDB 648474 which states the following in footnote #12 on page 4: *When stand-alone 1-g SAR is not required for a transmitter or antenna; for example, when the antenna is between 2.5 cm and 5.0 cm from other antennas, its SAR is considered zero in the 1-g summing process to determine simultaneous transmission SAR evaluation requirements.*

Based on the above-referenced procedural guidance:

1. Stand-alone 1-g SAR is not required for the Bluetooth (per KDB 648474 Page 3, last paragraph):
  - a. The Bluetooth (unlicensed transmitter) conducted output power is  $\leq P_{Ref}$  (12 mW) and the antenna is  $\geq 2.5$  cm from other antennas (WLAN)
2. Simultaneous transmission is not required because the Bluetooth does not require 1-g stand-alone SAR and it meets the minimum antenna separation requirement

The conclusion based on the KDB response was, that no further SAR evaluation was required for co-transmission of WLAN and Bluetooth in the IX750 when co-located in the IX750.

Best Regards,

A handwritten signature in blue ink that reads "Rod Munro". The signature is written in a cursive, flowing style.

Rod Munro