

Mark Briggs

From: oetech@fccsun27w.fcc.gov
Sent: Friday, January 15, 2010 7:44 AM
To: Mark Briggs
Subject: Response to Inquiry to FCC (Tracking Number 388910)



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Office of Engineering and Technology

Inquiry:

---Reply from Customer on 01/11/2010---

MB 1 - The change in ID has already been processed and the filing / grant match the grant issued for the original device. The FCC ID of the changed device is: L2C0041TR. As per 178919 v4r4 section 6 (g) we have processed the change in ID separately from the C2PC. We would now like to process a C2PC to add a specific rf exposure condition (<20cm from extremities) for a specific host device. MB 2 At the time we filed the change in ID it was not expected that the eirp/erp values for the specific host device using this module would be significantly different to those listed on the original grant. However as the values measured are higher I was seeking guidance to determine if the new measurements detailed in the original KDB inquiry would be considered a new rating. From your previous response I am concluding that the new values are too high to be considered "the same" and new ratings for eirp and erp are necessary. Please confirm whether or not 178919 v4r4 section 1 (c) (i) that discusses new antennas for a licensed device would allow a C2PC to increase an eirp/erp power listed on a grant. My interpretation has been that the introductory paragraph to 178919 precludes any change to the eirp/erp listed on the original grant if the eirp/erp is listed as the rating. After talking to others they read 1(c)(i) in isolation and considered it acceptable to modify the erip/erp rating provided that the rule part/rf exposure requirements are not exceeded. I can raise this to eastech@fcc.gov if you consider it worthwhile. MB 3 178919 does not specifically address a C2PC to modify a grant's power rating from eirp/erp to conducted output power. For a Part 22/24 module it is acceptable to list the conducted power (as explained in the power listing policy from July 2006 FCC-TCB conference call notes) provided that the grant also includes notes regarding the maximum gain antenna that can be used to comply with categorical exclusion thresholds and Part 22/24 output power limitations for mobile stations. Could we process this C2PC for FCC ID L2C0041TR to modify the power rating to list conducted power (based on the values reported in the original equipment filing) with grant notes to explain the maximum antenna gains that could be used? At the same time the C2PC would add values for the eirp/erp of a specific host device and host-specific rf exposure issues. If the power listed cannot be changed from eirp/erp to conducted power then our only option would be to proceed with a new modular filing based on the original device certification documents, listing the conducted output power. Grant notes would be used to list the maximum antenna gains in each band and to support any host-specific conditions.

Response:

TCB is permitted to process C2pc for this specific FCCID (L2C0041TR), in accordance with following general guidance

- 1) filing must document that rated conducted output from original filing is not increased
- 2) retain existing Form-731 line-entry powers as-is
- 3) amend pre-existing grant remarks / notes / conditions to address:
 - a) clearly and separately describe approved RF-exposure mobile vs. portable operating configurations and conditions
 - b) amend power listing description as follows as similar:
 "Power Output is ERP for part 22 and EIRP for part 24 measured using specific test configuration described in original filing under this FCC ID; the maximum measured radiated power for specific host configurations under permissive change filing(s) for this FCC ID is JJJ W for part 22 and KKK W for part 24. Rated conducted output powers are XXX W for part 22 and YYY W for part 24."

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