**Jon Hughes**

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**From:** Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]
**Sent:** Thursday, September 13, 2007 12:53 PM
**To:** jon.hughes@celltechlabs.com
**Subject:** Response to Inquiry to FCC (Tracking Number 508330)

## Inquiry:

---**Reply from Customer on 09/11/2007**---

Response from client as follows:

The modulation is Direct Sequence Spread Spectrum. The transmission duration is 1.33 seconds. The average transmission interval is 5 minutes min. Other modes have transmission intervals of 10 minutes and single (triple redundant) transmission only. Please refer to the attached theory of operation exhibit for more detailed information.

## Response:

FCC has not established general exemptions for devices subject to 2.1093 RF exposure routine evaluation.

If device supports it, testing at 100% duty-factor for highest output channel should be sufficient.

Do not reply to this message. Please select the Reply to an Inquiry Response link from the OET Inquiry System to add any additional information pertaining to this inquiry.

**Jon Hughes**

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**From:** Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]
**Sent:** Monday, August 27, 2007 5:49 AM
**To:** jon.hughes@celltechlabs.com
**Subject:** Response to Inquiry to FCC (Tracking Number 508330)

## Inquiry:

Device is a body-worn personal locator which transmits its location back to the satellite. Frequency range is 1611.25-1618.75 MHz. Modulation is CDMA and the maximum source-based time-averaged duty cycle is 0.5%. Maximum peak power is 22 dBm conducted, therefore the maximum source-based time-averaged conducted power would be -1 dBm (fyi, the antenna gain is 4 dBi). Crest Factor for the SAR evaluations would need to be set at 200, which would make the SAR evaluation extremely difficult, if not impossible.

Questions:

1. Is there any exemption to SAR testing for this device? It is understood that Part 25 falls under 2.1093.
2. If no to the above, do we test the device in continuous transmit mode of operation / 100% duty cycle?

## Response:

please provide other info and op desc about device operations and modulation and how duty factor is established

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