ELECTRONIC TECHNOLOGY SYSTEMS DR.GENZ GMBH

ELECTRONIC TECHNOLOGY SYSTEMS DR. GENZ GMBH - ETS -
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Federal Communications Commission
Authorization and Evaluation Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

IHR ZEICHEN / YOUR REF.	IHR SCHREIBEN / YOUR INFORM.	UNSER ZEICHEN / OUR REF.	DATUM / DATE
			26-Mar-02

FCC ID: L52CT-DECT-H24
Applicant: CeoTronics GmbH
Correspondence Reference Number: 22369
731 Confirmation Number: EA702360

Dear Sir,

Submitted herewith, on behalf of our customer is an amendment to the subject application, provided in response to your request for technical information:

Q1. antenna spec exhibit cross-section drawing shows 2.5cm from surface of uncompressed foam to antennas on PCB. Antenna gain is "< 6 dBi". Assuming 5.9 dBi, EIRP is 447mW. With compressed foam antennas will be closer than 2.5cm. Please submit SAR data for partial or fully compressed foam configurations. After RF exposure questions are resolved, users manual RF safety statement may need revision.

Answer:
We can not agree with the above mentioned.

1) The cross-section drawing shows that the distance is at least 2,5 cm.
   With statement of this value the compression of the ear cushion already was considered. For evidence please see photos as required in item 2. The distance from surface of uncompressed ear cushion to antennas on PCB is 4 cm (see photo 2). The minimal distance from surface of at most compressed ear cushion to antennas on PCB is 2,7 cm (see photo 5 and 6). Photos 5 and 6 show the Headset with dismantled ear cushion - the same condition as completely compressed.
2) According to the test report maximum EIRP is 115 mW and not 447 mW as assumed by you.
   EIRP 115 mW is the maximum radiated power as measured and stated in the test report. If you would like to calculate the value from conducted power in consideration of maximum antenna gain it results in nearly the same value (14.6 dBm + 5.9 dBi = 20.5 dBm).

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According to Supplement C Ed. 01-01 to Bulletin 65 Ed. 97-01 the consideration of duty cycle is also accepted for purposes of determining RF exposure.
The module has a low duty cycle of 4 % (for evidence please see test report appendix G) which causes a considerable RF exposure reduction.

All noted, it is our opinion that according to section 3 of Supplement C Ed. 01-01 to Bulletin 65 Ed. 97-01 including footnote 14 the SAR evaluation doesn't have to be required.

We would like to ask you to check our above mentioned arguments and to inform us of your decision.

Q2. Please submit internal photos of PCBs in housings.

Answer:
As requested please find attached internal photos which show the PCB in housing.

Q3. EMC report states:
"3.3 RF Exposure Compliance Requirements
This device comply the RF Exposure Complance Requirements.
See SAR test report 06/21/01 for DECT module."
All information to support a specific application must be included in the filing.

Answer:
Please find attached the SAR test report with integrated supplement relating to FCC requirements.
But note, the SAR measurement was a voluntary act from customer and is only to be considered if you require the SAR measurement regardless of arguments in item 1).

Q4. Is there metal in the headset? May need EMC and SAR tested with module in headset.

Answer:
Please see photo 7 as required in item 2. The headset contains only the components: module, push button, potentiometer and speaker.

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We hope this information is sufficient to issue the grant. If you have further questions please do not hesitate to contact us.

Sincerely,

Jürgen Baschin

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