RESEARCH IN MOTION

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Our Ref: 02928-CERT-Cover-Letter-Class II PC-reply November 14, 2001

Federal Communications Commission
Equipment Authorization Division
Application Processing Branch
7435 Oakland Mills Rd.
Columbia, Md. 21046

Attention: Mr. Joe Dichoso

FCC ID:	L6AR1900G-1-4
Correspondence Ref:	21232
EA:	102610
Subject:	Class II Permissive Change of FCC Part 24 Certification Application for Research In Motion (RIM) Limited, BlackBerry Wireless Handheld

This addresses the questions raised in your correspondence reference number 21232 dated November 13, 2001 for further clarification of RIM Class II Permissive Change submission.

The separation distance for a bystander exposure configuration is 5.9 mm (~ 6 mm) at a maximum SAR value of 1.24 W/kg (1.6 – measurement uncertainty) averaged over 1g of tissue. Please refer to page 11 of APREL report 3789, dated September 2001, for justification of the exponential curve fitting.

When the handheld is in the holster and the headset is attached, for body exposure configuration, the separation distance is 1.7 cm (total thickness of the belt clip and the holster edge) for a maximum SAR of 0.25 W/kg.
When the handheld is in holster and the headset is attached, for bystander exposure configuration, the separation distance is 5.9 mm for a maximum SAR of 1.24 W/kg.

Attached is the user RF safety information extracted from the handheld's User Manual.

SPECIFIC ABSORPTION RATE DATA

THIS MODEL WIRELESS HANDHELD MEETS GOVERNMENT REQUIREMENTS FOR EXPOSURE TO RADIO WAVES.

Your wireless handheld is a radio transmitter and receiver. It is designed and manufactured not to exceed the emission limits for exposure to radio frequency (RF) energy set by the Federal Communications Commission (FCC) of the U.S. Government and Industry Canada of the Canadian Government (IC). These limits are part of comprehensive guidelines and establish permitted levels of RF energy for the general population. The guidelines are based on standards that were developed by independent scientific organizations through periodic and thorough evaluation of scientific studies. The standards include a substantial safety margin designed to assure the safety of all persons, regardless of age and health.
The exposure standard for wireless mobile handhelds employs a unit of measurement known as the Specific Absorption Rate, or SAR. The SAR limit set by the FCC/IC is 1.6W/kg.* Tests for SAR are conducted using standard operating positions specified by the FCC/IC with the handheld transmitting at its highest certified power level in all tested frequency bands. Although the SAR is determined at the highest certified power level, the actual SAR level of the handheld while operating can be well below the maximum value. This is because the handheld is designed to operate at multiple power levels so as to use only the power required to reach the network. In general, the closer you are to a wireless base station antenna, the lower the power output.
Before a wireless handheld model is available for sale to the public, it must be tested and certified to the FCC/IC that it does not exceed the limit established by the government-adopted requirement for safe exposure. The tests are performed in positions and locations (e.g., worn on the body) as required by the FCC/IC for each

model. The highest SAR value for this model handheld when tested for use when worn on the body, as described in this user guide, is 0.25 W/kg. (Body-worn measurements differ among wireless handheld and phone models, depending upon available accessories and FCC/IC requirements). A separation of at least 6 mm (1/4”) should be maintained between bystanders and the back of the wireless handheld when worn on the body. While there may be differences between the SAR levels of various wireless devices and at various positions, they all meet the government requirement for safe exposure.
The FCC has granted an Equipment Authorization for this model handheld with all reported SAR levels evaluated as in compliance with the FCC RF emission guidelines. SAR information on this model handheld is on file with the FCC and can be found under the Display Grant section of http://www.fcc.gov/oet/fccid after searching on FCC ID L6AR1900G-1-4.
Additional information on Specific Absorption Rates (SAR) can be found on the Cellular Telecommunications & Internet Association (CTIA) web-site at http://www.wow-com.com.

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* In the United States and Canada, the SAR limit for mobile handhelds used by the public is 1.6 watts/kg (W/kg) averaged over one gram of tissue for the body or head (4.0 W/kg averaged over 10 grams of tissue for the extremities - hands, wrists, ankles and feet). The standard incorporates a substantial margin of safety to give additional protection for the public and to account for any variations in measurements.

Should you require further clarification, or have any questions, please do not hesitate to contact the undersigned.

Yours truly,

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