



114 OLINDA DRIVE • BREA, CALIFORNIA 92823 • (714) 579-0500 • FAX (714) 579-1850

January 24, 2007

RE: O'Neil Product Development, Inc.
FCC: LGYWL261176

1) For the model LP3-L, it does not appear that the back of the unit that would typically be positioned against the body was actually tested. Additionally, it is uncertain exactly where the board/antenna is located even though the photos show some of this information.

Response: The LP3-L was tested in the worst case (Printer turned 90 degrees with antenna as close to the body. Additional photos of the LP3-L are also attached.

2) For the model OC2-L, it is uncertain how this device will normally be positioned body worn. Please provide further detail.

Response: Please see the Additional Photos for how the unit will be body worn.

3) Please provide sufficient information to show how each unit would normally be body worn, compared to how the device was tested for SAR.

Response: Please see the Additional Photos showing how the devices were tested for SAR and how each unit would normally be body worn.

4) From the manual, it is not clear what body worn accessories are for use with each printer (straps, belt clips, holsters, etc.)

Response: Please see the Additional Photos

5) Typically the manual would explain RF exposure information to the user (i.e. proper positioning, meeting FCC RF exposure requirements, etc.).

Response: The RF exposure Information is on page 27 as part of the FCC Notice. The Owner's Manual has been resent to highlight the RF exposure information.



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6) SAR reports reference 15E for FCC. This appears incorrect.

Response: This has been Revised to say 15 Subpart C; Section 15.247

7) Even though the SAR power is expected to be \geq EMC power, it is expected to be within 0.5 dB. 802.11 g maximum power appears $>$ 0.5 dB. Please review.

Response: The test levels are within 0.5 dB of the 802.11 g maximum power. Please note that the power output were done on each individual channel and each individual channel is within 0.5 dB (and also \geq) of the EMC test report Also, the first page of each SAR test report has been revised to correctly state the maximum power for 802.11 g.

The EMC test report also has the output power taken for each channel.

8) Please explain where the SAR report explains:

a) The probe tip distance to phantom inner surface

b) The first 2 measurements points in a zoom scan, closest to the phantom surface, should be within 1 cm of the surface.

c) Distance between the measurement point (distance + offset) at the probe sensor location (geometric center behind the probe tip) and the phantom surface is $<$ 8.0 mm and maintained at a constant distance of \pm 1.0 mm during an area scan to determine peak SAR locations

Response: (from SAR Test Lab) The #8a is located in the probe calibration report on the third page of the report.

#8b. The first measurement is conducted with the sensor (offset + position) 5 mm from the phantom. The second measurement is conducted with the sensor (offset + position) 10 mm from the phantom.

#8c. During the area scan, the test is conducted with the tip of the probe 5 mm from the phantom. The offset of the probe is 1.56 mm which give you a distance of 6.56 mm from the phantom. The tolerance of the robot arm is \pm 0.05 mm.