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**Sent:** Tuesday, September 15, 2009 11:43 PM  
**To:** Rex Liao Intertek  
**Subject:** Response to Inquiry to FCC (Tracking Number 928253)



## Office of Engineering and Technology

### Inquiry:

---Reply from Customer on 09/14/2009---

- 1.The antenna was fixed 90 degrees to the dongle case, and it can not rotated including be stowed along the side of the dongle.
- 2.The button on the side of the dongle is for camera switch and pairing, the dongle can pairing to four camera. And then use the button can change camera,the dongle will communicated with one camera at one time.
- 3.About FCC ID because this case isn't grant yet, so we don't have it yet.

### Response:

When the maximum average conducted output power at the antenna port is above 60/f(GHz), SAR evaluation is necessary. SAR should be tested for the following orientations:

1. with the device connected directly to a horizontally oriented USB port on a laptop computer and the dipole antenna is pointing up with respect to the laptop computer, measure SAR with the body of the dongle (housing) at 5 mm from the flat phantom to evaluate effects at the base of the dipole.
2. with the device connected directly to a vertically oriented USB port on a laptop computer and with the dipole oriented horizontally and located toward the bottom of the laptop computer, measure SAR with the outer surface of the dipole at 5 mm from the phantom. If the proper vertical USB port is unavailable, a high quality USB cable (12" or shorten) may be used to establish the same configuration for SAR testing.

These are the only two SAR test configurations that are necessary and should be tested according to the normal SAR procedures (high, middle and low channels or apply test reduction according to KDB 447498 if appropriate).

Please identify this KDB tracking number in you 731 Form during equipment certification and advise the TCB performing the approval to clearly identify the device in the grant comments; i.e. is it only for the dongle or does it include the dongle and the camera transmitters as a system. The exposure conditions for the dongle and the camera transmitters are different; therefore different exposure limits apply (SAR vs. MPE). The type of device should be clearly stated in the grant; for example, wireless camera system (user manual), baby monitor (output power results attached in this KDB) etc.

The output power results attachment in this KDB is indicating 120 vac as test voltage, which does not seem appropriate for a USB device.

The RF exposure information and instruction in the attached manual is also incorrect, which must be revised before seeking equipment certification. A separation distance of 20 cm does not apply to portable exposure conditions, such as this dongle; SAR applies. Depending on the operating and installation requirements, the 20 cm separation "may" apply to the camera transmitter/antenna when properly installed (see FCC rules in 2.1091 and 2.1093). These instructions must be corrected to avoid issues during or after certification.

[Horizontal down position photo](#)

[SPEC](#)

2009/10/8

[Installaton guide](#)  
[wireless chipset](#)  
[External photo](#)  
[Internal photo](#)  
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