

Response to FCC requested information:

A) SAR test exemption considerations:

- 1) please confirm Form-731 intended to list only part 90, or if other FCC rule parts are intended too please explain

Form 731 includes Part 90, 80, 74 & 22. Please refer to the Justification Letter from Thales. File name *Liberty_FCC_Justify_Letter.pdf*

- 2) When maximum 50 % duty factor is intended, however info is also needed about actual maximum transmission duty factor supported by the device. For devices which have potential to transmit at higher than 50 % duty factor, e.g. PSTN/telephone mode and/or VOX mode, to satisfy requirements to qualify for operation under occupational exposure limits, clear RF training and operating instructions are necessary (fully aware of and have full control of the exposure to satisfy compliance) specifically for all modes.

Please see attestation letter from Thales. File name *Liberty Attestation 03162009.pdf*

- 3) please submit within this KDB complete user operating instructions

Please see file name *Liberty Users Guide PN 84382 DHS(1).pdf*

- 4) please submit within this KDB external photos including all antenna options

Please refer to file name *Liberty_Photos_External.pdf*

- 5) please submit within this KDB external photos and/or info about available body-worn accessory configuration options, if/where not covered by preceding items

Please refer to file name *Liberty_Photos_External.pdf*

- 6) please provide details about the separation distance between the antenna and the user's body, and the device enclosure and the user's body, while the device is worn with the belt-clip(s)

a.i) separation distance between antenna and users face=5.5cm

a.ii) separation distance between antenna and users body=2.0 cm with belt-clip; 2.2 cm with belt-holster

a.iii) separation distance between device enclosure and users body=1.6 cm with belt-clip; 2.0 cm with belt-holster

b.i) Maximum RF conducted output power level evaluated=5.2 Watts

b.ii) Maximum SAR levels measured=Face-held: 0.576 W/kg (50% PTT duty factor); Body-worn: 1.71 W/kg (50% PTT duty factor)

- 7) please provide info to confirm whether there is next to the ear operation [see KDB 447498 item 5) b)]

The manufacturer confirms this device does not support next to ear operation. See attestation letter from Thales. File name *Liberty Attestation 03162009.pdf*

- 8) please provide info to justify that device qualifies for occupational exposure limits

Please refer to Thales Occupational Letter, file name *Liberty Occupational Justification.pdf*

- 9) please describe how KDB 447498 item 8) is fulfilled

Please refer to Thales Occupational Letter, file name *Liberty Occupational Justification.pdf* and the instruction manual file name *Liberty Users Guide PN 84382 DHS(1).pdf*

B) General remarks:

NOTE 1 - TCB please ensure filings address KDB 634817

Please refer to Justification Letter from Thales. File name *Liberty_FCC_Justify_Letter.pdf*

NOTE 2 - TCB please ensure filings address part 90 grant power policy:

Related to 20 % of 90.205(r), all part 90 filings should have:

i) EMC / radio test report, user manual, op. desc. exhibits and Form-731 power at P_{rated}

All items provided.

ii) RF exposure evaluation, if applicable, at (P_{rated} + 20 %), unless filing documents that device will not give 120 % output

See attestation from Thales file name *Liberty Attestation 03162009.pdf*