Nov. 16, 2001

**FEDERAL COMMUNICATIONS COMMISSION**

Attention:      Mr. Steve Dayhoff

**Subject:**      **K & A Wireless LLC**
                **FCC ID: OPH-VBLAST2400**
                **731 Confirmation No.: EA101939**
                **Correspondence No.: 21067**

Dear Mr. Dayoff,

Attached in the "Users Manual" folder please find the revised Users' Manual with revised RF Exposure Warning and Radio Installation Instruction and the Applicant's Statement with Pictures of Specific Cameras (for use by Fire Department) with the K&A VBLAST2400 Radio Module to ensure the RF Exposure Compliance per your request in the Correspondence # 21067.

The following our answers and explanation about the SAR Test Report:

Q1: pg 10 - FYI Suppl C target permittivity and conductivity are 52.7 and 1.95
Q2: pg 17 - 23% overestimate is incorrect - please correct this to 11% (from Kuster/Balzano theory).

A1 & A2) Target tissue parameter had been changed and new parameter was ratified recently in the SCC-34 IEEE Standards and the revised OET 65 supplement C. And back then, we were told to use parameters that would overestimate SAR to ensure compliance.

Q3: In the SAR vs depth plots, the second measured point from the surface is consistently off the curve-fit. In addition, in many plots the measured data falls below the curve-fit in the 10-20 mm range. This appears to create an underestimate of peak SAR. The curve-fit should fit the 2nd point and the data in 10-20 mm better. Please explain and/or re-calculate.

A3: Due to the surface detection mechanism of the system, The Second and succeeding point measurements were taken at slightly closer distance from the surface of the phantom than it supposed to be. Therefore this will result in SAR overestimating while the integration over the 1-gram volume is calculated. This will not happen with using the flat phantom. The value in the 10-20mm range are being measured of the system's noise flows and so a higher error is expected on levels close to the system's noise flows where signal fidelity is poor.

Q4: In the SAR vs depth plots, is a boundary-effect correction applied to the measured point first from the surface?

A4: Our system doesn't compensate in boundary-effect at the moment but we are using the probe which diameter is as small as 4mm (half the probe diameter : 2 mm) to minimize the boundary-effect.

Please feel free to contact us if you have any questions

Best Regards

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