

PREPARED BY: MICHAEL S. FULK	PHONE: (804) 592-6202	DATE: 9/29/2000	REV. A	DOCUMENT INFO: MF2000:122
---------------------------------	--------------------------	--------------------	-----------	------------------------------

SUBJECT: PANTHER 300P FCC TYPE ACCEPTANCE ISSUE – SAR SEPARATION SPECS

To: B. Clavier (RheinTech Labs)

Cc: D. Foust S. Miller T. Camper Paul Cardinal (Aprel Labs) S. Montealegre S. Frackleton

After discussions with Dr. Paul Cardinal of Aprel Labs, and review of the two SAR reports for the Panther 300P front face position and belt clip position, the following statements can be made:

- 1) The original statement in the first preliminary Panther 300P Operator's manual mentioned "Always keep the antenna 1 cm (0.4 inches) away from the body when transmitting to ensure FCC RF exposure compliance requirements are not exceeded." The FCC questioned the derivation of the 1 cm distance.
- 2) After review, I have decided that the 1 cm distance was part of a boilerplate description first used for the EDACS 300P personal's Operator's manual. It is not applicable for the Panther 300P personal.
- 3) The Aprel Labs report "Certification Report on SAR Experimental Analysis in Front of Face" report number "CNEB-PANTHER 300P-3471" indicates that the Panther 300P passes the SAR occupational/controlled exposure limits EVEN IF THE PANTHER 300P IS PRESSED UP NEXT TO THE NOSE. In other words, there is no need for a 1 cm separation distance.
- 4) The Aprel Labs report "Certification Report on SAR Experimental Analysis on Body" report number "CNEB-PANTHER 300P-3472" indicates that the Panther 300P passes the SAR occupational/controlled exposure limits with the use of the CNE provided belt clip (which was the KRY 101 1232/2).
- 5) CNE recommends the following change in the last paragraph at the bottom of page 5 of the Panther 300P's Operator's manual. **"The Panther 300P meets the FCC RF exposure limits for occupational/controlled exposure at any distance from the front of the face. Similarly, the Panther 300P meets the same FCC RF exposure limits in a belt clip application, PROVIDED THAT the Com-Net Ericsson Belt Clip Part Number KRY 101 1232/2 is used. Use of this specified CNE belt clip when transmitting will ensure that FCC RF exposure limits are not exceeded."**

Please see if this change in wording is acceptable to the FCC. Thank you.

Kind regards, Michael Fulk