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June 15, 2000

Federal Communications Commission  
EQUIPMENT AUTHORIZATION BRANCH  
7435 Oakland Mills Road  
Columbia, MD 21046

**Subject: Type Acceptance for FCC ID: OWDTR0001-E**  
**In response to: FCC EMAIL of 4/17/00 (correspondence reference number 13496)**

cc: Mr. Desmond Fraser, President, Rhein Tech Laboratories, Inc.

To whom it may concern:

In response to items 1, 2, and 3 of FCC correspondence 13496, Com-Net Ericsson hereby submits two new SAR test reports that address the FCC concerns.

Based on the anticipated use and the SAR test data, Com-Net Ericsson Inc., Lynchburg, VA, herein requests occupational/controlled environment Type Acceptance for the OWDTR0001-E portable transceiver. The OWDTR0001-E transceiver is a push-to-talk trunking portable that operates in the 806-869 MHz band at a rated power level of 1 to 3 watts.

In our interpretation of 47 CFR 2.1093 (d), we believe that 3 points must be proven to obtain approval for occupational use SAR limits.

1. Per 47 CFR 2.1093 (d) (1), persons must be exposed as a consequence of their employment.
2. Per 47 CFR 2.1093 (d) (1), persons must be aware of their exposure.
3. Per 47 CFR 2.1093 (d) (1), persons must exercise control over their exposure.

The following justification is provided for each point:

1. Exposure as a consequence of employment.

This is evidenced by each of the points below.

- A) This radio is not marketed to the general public. It is intended for use by business and industry, and also for limited public safety use.
- B) The radio's primary functionality is as an EDACS trunking radio. It is not useable for the general public because EDACS base station sites are not made available to the general public, and the radio will not function as a trunking radio without an EDACS site.
- C) The end user cannot program transmit frequencies into the transceiver without the use of additional external equipment that is controlled by the administrator.

2. Awareness of exposure.

Per 47 CFR 2.1093 (d) (1), "Awareness of exposure can be accomplished by use of warning labels, or by specific training or education through appropriate means, such as an RF safety program in a work environment". Com-Net Ericsson proposes the following.

- A) The label containing the FCC identifier will be modified to also add the following text:



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“SAR Certified for occupational use. See operator’s manual for proper use.”

See attached modified label drawing.

- B) The operator’s manual will be updated to add the training information indicated in the attachment. This is the primary means of training (a combination of the warning statement on the label, plus detailed training in the operator’s manual).
- C) As a secondary means of additional training, existing EDACS training classes will be modified to include SAR training.

3. Control over exposure.

This is a push-to-talk radio. When the PTT button is not pushed, there is no voice transmission. Thus, the user is in control of his or her exposure.

The OWDTR0001-E has been evaluated for S.A.R. and with a 50% maximum duty cycle as is typical for a push-to-talk device, for all configurations, it was found to be well within the limits specified in 47 CFR 2.1093 (d) for occupational use. See attached SAR report.

This memo supercedes and replaces my memo of March 13, 2000, regarding speaker microphones. Com-Net Ericsson will market this product with the tested speaker microphones, for occupational use only.

Best regards,

Jerry Ferr  
Engineering Project Lead II  
Com-Net Ericsson Critical Radio Systems



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## **Safety Information**

### Radio Frequency (RF) Energy

Your Com-Net Ericsson transceiver radiates RF electromagnetic energy during transmit mode. It has been tested and certified to comply with Specific Absorption Rate (SAR) requirements for occupational / controlled environment. Additionally, your Com-Net Ericsson transceiver is designed to comply with the following National and International Standards and Guidelines with regard to RF energy and electromagnetic energy exposure to humans:

- FCC OET Bulletin 65 Edition 97-01 Supplement C, Evaluating Compliance with FCC Guidelines for Human for Human Exposure to Radio Frequency Electromagnetic Fields.
- FCC 96-326 Guidelines for Evaluating the Environmental Effects of Radio Frequency Radiation.
- American National Standards Institute (C95.1 – 1992), IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.
- American National Standards Institute (C95.3 – 1992), IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave.

To ensure safe and efficient operation of your Com-Net Ericsson transceiver, always adhere to the following guidelines to assure that your exposure to RF electromagnetic energy is within the above safe standards.

- Never operate transceiver without proper antenna firmly attached.
- Use only Com-Net Ericsson accessories (antennas, batteries, belt clips, speaker mics, etc) to ensure your transceiver complies with SAR safety limits.
- Operate transmitter with a maximum of 50% duty cycle.
- Keep antenna at least 1 cm (0.4 inches) from body when transmitting.
- When transmitting, hold radio in an upright position approximately 5 cm (2 inches) from mouth, and slightly off to one side for best sound quality.

### **Electromagnetic Interference/Compatibility**

Your Com-Net Ericsson transceiver generates RF energy when transmitting that can possibly cause interference with other devices or systems. To avoid such interference, turn off radio when in an area where signs are posted to do so. For example, when in hospitals, aircraft, or other areas that are sensitive to electromagnetic radiation such as blasting sites, do not operate the transmitter.