



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

January 28, 2003

RE: Delta Networks, Inc.

FCC ID: PD5LMWP200RB

After a review of the submitted information, I have a few comments on the above referenced Application.

**SAR Review**

- 1) Please update the test report should include the following:
  - a) statement of compliance with FCC RF exposure included (§2.1093)?
  - b) mobile or portable transmitter device category identified?
  - c) testing for Occupational/Controlled OR General Population/Uncontrolled limits?
  - d) test device is production unit or identical prototype (47 CFR §2.908)?
  - e) procedures to establish the test signals describe? This may include a test equipment list or test codes.
  - f) The probe, validation dipoles, and phantom have been described. However, the test report should also include a brief description of the SAR scanning measurement system (controller, robot, etc.)?
  - g) Composition, ingredients, and amounts for tissue liquid listed.
- 2) The Z-axis plots provided in the report only confirm a 3-4 cm liquid depth. The FCC likes to be able to confirm that the 15 cm liquid depth was present by supporting photographs or Z-axis data which shows this depth. This was not provided for the actual test. Please confirm that the liquid depth was at least 15 cm.
- 3) The values on the SAR plots for the conductivity and permittivity do not appear to be provided from the test report, or an explanation at how these values were arrived at.
- 4) Better information should be supplied regarding the interpolation and extrapolation used by the system. For instance:
  - a) descriptions of extrapolation procedures used to estimate SAR values adjacent to phantom surface (unreachable due to probe case and boundary effects)
  - b) descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid
  - c) description of averaging (integration) procedures to get 1-g SAR from final interpolated grid.
- 5) Section 5.1 states that a course scan was performed around the the highest spatial SAR location. However there is not a description of how this location was determined.
- 6) What was the probe tip distance to phantom inner surface during course scans.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.