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제목: Response to Inquiry to FCC (Tracking Number 547865)

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**Office of Engineering and Technology**

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**Inquiry on 12/23/2014 :**

**Inquiry:**

With

reference to a X-ray detector, we have some questions.

1.  
The X-ray detector does not use the side & rear surface. So, we think that the X-ray detector has to need the front surface. please check it.

2. For head SAR, testing of both head and body properties should be conducted using a flat phantom. please check it.

**FCC response on 12/23/2014**

X-Ray bucky style devices do require SAR analysis consistent with KDB Publication 447498 D01 (including simultaneous transmission considerations). Accordingly, SAR testing will be required if the test exclusion criteria outlined in Section 4.3 are not met. Please be aware that, should testing be required, a 0mm test distance should be considered for such an EUT.

Specifically:

1. KDB 447498 D01 states that the test separation distance will be determined by the smallest distance between the outer surface of the devices and the user (4.1.5). In this case, a distance of 0mm is expected. In such cases, SAR testing of the EUT in direct contact with a flat phantom would be appropriate.

Section 4.3.1 and 4.3.2 discuss standalone and simultaneous test exclusion procedures which may be applicable to the different transmitters on the EUT. Should test exclusion be applied, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion being claim. All analysis should consider both Wi-Fi antennas.

With regard to Wi-Fi specific testing configurations, KDB Publication 248227 D01 discusses proper channel and setup procedures.

2. SAR testing along the side of the x-ray detector is not required so long as there is no use case requiring a user to be within 20cm of the outer edge of the EUT.
3. Testing of both head and body properties should be conducted using a flat phantom. These parameters are outlined in KDB Publication 865664 D01.

**Attachment Details:**

[X-ray detector](#)

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