

William Graff

From: William Graff [whgraff@atcb.com]
Sent: Thursday, April 07, 2005 5:56 PM
To: 'JayKim'
Subject: Cyberbank PGVCB-0880

JayKim,

A further explanation of my item #5 from my letter of April 6 is proper.

FCC wants measurement distance from the phone (not belt clip/holster) to the phantom. The reason is political and very little technical. Manufacturers of after-market accessories claimed the FCC was showing favoritism by allowing cellphone manufacturers to specify using only their belt clips/holsters. They one their case in US courts. In response, FCC passed an interpretation that requires a simple distance from the flat part of phantom to the phone shall always be shown on the Grant. Losers were OEM manufacturers. Winners were aftermarket suppliers.

Therefore, you cannot simply specify a distance from the phantom to the phone with belt clip is 0cm - I need a better representation of the distance needed for SAR compliance.

FYI: Usually 15mm has become the industry "de-facto" standard. Distances that approach 20-25mm or more attract the eye of FCC auditors.

I hope this helps

Bill

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