

Chris Harvey

From: Joe Hsieh [hsieh@etc.org.tw]
Sent: Friday, March 28, 2008 6:36 AM
To: Chris Harvey
Cc: charvey-tcb@ccsemc.com
Subject: Re: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1, Assessment NO.: AN08T7511, Notice#2

Attachments: 07-12-MAS-065-07_SAR report.pdf



07-12-MAS-065-07
_SAR report.pdf...

Dear Chris,

Attached please find the SAR test report.
The output power is low. The SAR result is low, too.
Please check and any questions please feel free to contact with me ASAP.
Thanks a lot.

Best regards,
Joe

----- Original Message -----

From: "Chris Harvey" <charvey@ieee.org>
To: "'Joe Hsieh'" <hsieh@etc.org.tw>
Cc: <charvey-tcb@ccsemc.com>; "'Lucy Tsai'" <lucy.tsai@ccsemc.com>; "'Mike Kuo'" <mike.kuo@ccsemc.com>
Sent: Tuesday, January 29, 2008 8:39 PM
Subject: RE: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1, Assessment NO.: AN08T7511, Notice#2

> Joe, the FCC requires the power measurements for FCC 15.247 to be made
> with a Peak Detector. They also allow that if the Peak Conducted
> Power or the Peak EIRP are both below the low threshold, then SAR
> measurements are not needed for portable devices.
>
> The Duty Cycle corrections allowed are only those that are inherent in
> the source, and always as device is operating at its worst case duty factor.
> If
> the user can modify this setting, then this can not be considered
> Source-Based, because the user has control.
>
> If you need an interpretation on this issue, I would suggest
> contacting the FCC Knowledge Database at:
> www.fcc.gov/labhelp
>
> Here is the link to the FCC's SAR measurement Guide for 802.11
> devices, which indicates that a 100% duty factor should be used:
> <http://gullfoss2.fcc.gov/prod/oet/forms/blobs/IDRetrieve.cgi?attachme>
> [nt_id=](#)
> 22884
>
> Best regards,
>
> Chris Harvey
>
> -----Original Message-----
> From: Joe Hsieh [mailto:hsieh@etc.org.tw]

> Sent: Tuesday, January 29, 2008 6:25 AM
> To: Chris Harvey
> Cc: charvey-tcb@ccsemc.com; 'Lucy Tsai'; 'Mike Kuo'
> Subject: Re: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID:
> RXZ-WU81RL1, Assessment NO.: AN08T7511, Notice#2
>
> Dear Chris,
>
> Thank you for your reply.
> So, even the power meter take the average output power value, this
> result still not accepts by FCC. Right?
> We know the difference between peak and average value will let the
> duty factor small than 1.
> If this duty factor exists, why the FCC wants to disregard? The
> apparatus is
>
> not working for average power measurement?
> Or the FCC does not believe this device has average power.
> Please excuse my ignorant. Thank you.
>
> Best regards,
> Joe
>
> ----- Original Message -----
> From: "Chris Harvey" <charvey@ieee.org>
> To: "'Joe Hsieh'" <hsieh@etc.org.tw>
> Cc: <charvey-tcb@ccsemc.com>; "'Lucy Tsai'" <lucy.tsai@ccsemc.com>;
> "'Mike Kuo'" <mike.kuo@ccsemc.com>
> Sent: Monday, January 28, 2008 6:47 PM
> Subject: RE: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID:
> RXZ-WU81RL1, Assessment NO.: AN08T7511, Notice#2
>
>
>> Joe, I agree that is very confusing. The FCC uses the Term
>> Source-based Time Average to allow devices that have a duty-cycle
>> that is constant and related to the way something always works. For
>> example, GSM has 8 time slots, so a device that uses only one time
>> slot has a 1:8 duty cycle. A GSM handset can not decide on its own
>> to transmit on 4 time so its Source Based Time Average is a duty
>> cycle of 1:8 (actually 1:8.3). The controlling Source for GSM is the
>> Base-station, which for a 1-time-slot device, will only ever use 1
>> time slot.
>>
>> Your device does not have a Source Based reason for a Duty Cycle
>> Correction.
>> The TCB Exclusion List requires the use of the higher of the Peak
>> Conducted Output Power or the Peak EIRP. The FCC will not allow the
>> use of Average Power.
>>
>> Please let me know if you have further questions.
>>
>> Best regards,
>>
>> Chris Harvey
>>
>>
>> -----Original Message-----
>> From: Joe Hsieh [mailto:hsieh@etc.org.tw]
>> Sent: Sunday, January 27, 2008 9:06 PM
>> To: Chris Harvey
>> Cc: charvey-tcb@ccsemc.com; 'Lucy Tsai'; 'Mike Kuo'
>> Subject: Re: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID:
>> RXZ-WU81RL1, Assessment NO.: AN08T7511, Notice#2
>>
>> Dear Chris,
>>

>> The letter of "Appendix A: TCB Exclusions List" describe:
>> Output power for portable transmitters is the higher of the conducted
>> or radiated (EIRP) source-based time-averaged output.
>>
>> May I ask that what the meaning of "the conducted or radiated (EIRP)
>> source-basic time-averaged output"?
>> The engineer checks the conducted power by the power meter; the
>> average power is 3 to 4 dB lower than peak power.
>> Could we use average power to calculate the EIRP for the low threshold?
>> If okay we will add the average power result in the test report to
>> meet the requirement.
>> Thank.
>>
>> Best regards,
>> Joe
>>
>> ----- Original Message -----
>> From: "Chris Harvey" <charvey@ieee.org>
>> To: "'Joe Hsieh'" <hsieh@etc.org.tw>
>> Cc: <charvey-tcb@ccsemc.com>; "'Lucy Tsai'" <lucy.tsai@ccsemc.com>;
>> "'Mike Kuo'" <mike.kuo@ccsemc.com>
>> Sent: Wednesday, January 23, 2008 7:44 PM
>> Subject: --Unscanned-- RE: PRO-NETS Technology Corp., FCC ID:
>> RXZ-WU81RL1,
>> Assessment NO.: AN08T7511, Notice#2
>>
>>
>>> Joe, I have not completely reviewed the test report you have
>>> submitted, but I did check about the power compared to the low
>>> threshold. The Peak RF Conducted power of 13.78dBm (23.9mW)
>>> complies with the low threshold, however the EIRP (13.78dBm +
>>> 1,76dBi antenna gain= 15.54 dBm) is 35.8mW, which is over the low
>>> threshold. I have attached the link to the FCC TCB Exclusion list
>>> for your reference. This issue is not yet resolved, because the
>>> power is still above the low threshold.
>>>
>>>
>>>
> [http://gullfoss2.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20](http://gullfoss2.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20247&sw)
> 247&sw
>>> itch=P
>>>
>>> Please contact me if you have any questions.
>>>
>>> Best regards,
>>>
>>> Chris
>>> -----Original Message-----
>>> From: Joe Hsieh [mailto:hsieh@etc.org.tw]
>>> Sent: Tuesday, January 22, 2008 10:05 PM
>>> To: Chris Harvey
>>> Cc: charvey-tcb@ccsemc.com
>>> Subject: Re: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1,
>>> Assessment
>>> NO.:
>>> AN08T7511, Notice#2
>>>
>>> Dear Chris,
>>>
>>> Attached please find the revised test report.
>>> The output power has reduced to meet the low threshold requirement.
>>> Please confirm and check. Thanks.
>>>
>>> Best regards,
>>> Joe
>>>

>>> ----- Original Message -----
>>> From: "Joe Hsieh" <hsieh@etc.org.tw>
>>> To: "Chris Harvey" <charvey@ieee.org>; <charvey-tcb@ccsemc.com>
>>> Cc: <charvey-tcb@ccsemc.com>
>>> Sent: Tuesday, January 22, 2008 9:26 AM
>>> Subject: Re: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1,
>>> Assessment
>>> NO.:
>>>
>>> AN08T7511, Notice#2
>>>
>>>
>>>> Dear Chris,
>>>>
>>>> Thank you so much for your confirm.
>>>> This customer tell me that they has a project: "FCC ID: RXZ-WU81RL"
>>>> use the same way but the power is bigger.
>>>> Could you please let me know that where can find this conclusion
>>>> for USB device? I hope I can show to the customer.
>>>> Okay. I will ask the customer to reduce the power setting (the mode
>>>> that over Low Threshold limit).
>>>> The testing will be perform ASAP and send the new test report to you.
>>>> Thank you again.
>>>>
>>>> Best regards,
>>>> Joe
>>>>
>>>> ----- Original Message -----
>>>> From: "Chris Harvey" <charvey@ieee.org>
>>>> To: "'Joe Hsieh'" <hsieh@etc.org.tw>; <charvey-tcb@ccsemc.com>
>>>> Cc: <charvey-tcb@ccsemc.com>
>>>> Sent: Tuesday, January 22, 2008 5:39 AM
>>>> Subject: RE: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1,
>>>> Assessment
>>>> NO.: AN08T7511, Notice#2
>>>>
>>>>
>>>>> Dear Joe, this is not an acceptable solution for a USB Dongle that
>>>>> contains a connector that can connect directly to the laptop
>>>>> computer. If the cable is permanently connected to the Dongle,
>>>>> then that be better to ensure the Dongle is not connected directly
>>>>> to the laptop. If this device is restricted to use in Mobile only
>>>>> devices, then that could be acceptable.
>>>>> However, this device as marketed is intended to be used in any USB
>>>>> port, and therefore must be tested for SAR compliance.
>>>>>
>>>>> Please let me know if you have any questions about this.
>>>>>
>>>>> Best regards,
>>>>>
>>>>> Chris Harvey
>>>>>
>>>>>
>>>>> -----Original Message-----
>>>>> From: Joe Hsieh [mailto:hsieh@etc.org.tw]
>>>>> Sent: Sunday, January 20, 2008 8:19 PM
>>>>> To: charvey-tcb@ccsemc.com
>>>>> Cc: charvey-tcb@ccsemc.com
>>>>> Subject: Re: PRO-NETS Technology Corp., FCC ID: RXZ-WU81RL1,
>>>>> Assessment
>>>>> NO.:
>>>>> AN08T7511, Notice#2
>>>>>
>>>>> Dear Chris Harvey,
>>>>>
>>>>> Thank you for your mail.

>