

Hello Mike,

After our review of this application we have identified the following issues,

1. Please confirm that the headset and the scanner are provided to the end-users by Voxware. It appears that below 1GHz for radiated spurious emissions compliance, shielded scanner cable was needed. Please clarify.

Response - The case and headset are provided by Voxware, the scanner with shielded cable can be obtained from a 3rd party. Details appear in the updated user guide attached.

2. In the manual there's a warning about professional installation on second page. This needs to be justified or removed.

Response - This warning is for non-regulatory purposes. It has been moved from the regulatory section on page 2 to a section of page 1.

3. The highest recorded SAR value must be listed in the manual for body-worn configuration with the device cover supplied by Voxware.

Response - This has been added (attached)

4. A warning in the manual against the use of other accessories is required. Only the accessories; device cover, headset and scanner as used in SAR testing can be used with the device. The manual must provide photos or descriptions of these allowed accessories.

Response - This has been added (attached)

Findings related to SAR report are as follows.

5. It appears that FCC ID is not listed in the SAR report. This is required.

Response - Added in the report (EMC15036-SAR FCC)

6. Calibration certificate of the probe used for SAR testing is required. This certificate must include all the probe factors and errors.

Response - Please see the attached file (SN0107cal1)

7. Please also supply the calibration data of the dipole used for SAR system verification. The report shows 1g SAR target value and liquid parameters on Pg 13, therefore manufacturers data about the reference dipole is required to support it.

Response - Please see the attached files (2450 dipole certification) & (SAR Dipole verification)

8. The Table on Pg 28 of the report shows dielectric parameters at 2450MHz body liquid that is out of the 5% range from the values in OET Bulletin 65 Supp C. Please justify this difference.

Response - The Table on Pg 28 of the report has been updated (EMC15036-SAR FCC)

9. Pg of the report shows a probe S/N that is different from the one used in SAR testing and system validation. Please clarify.

Response - See updated report (EMC15036-SAR FCC)

10. Please specify the distance between the probe sensor location (geometric center behind the probe tip) and the phantom surface during the area scan to determine peak SAR location. Within what tolerance (in mm) has this distance been maintained?

Response - The distance between the probe sensor location and the probe tip is 2.7mm. This dimension corresponds with the engineering drawings for the probe but, since the probe tips are opaque, we have confirmed this dimension by X-raying representative probes. Please see attached X-ray (xray.jpg), which we used to confirm the dimension of 2.7mm. The tolerances are discussed in the attached Word document (sensortip.doc). TCB note – the test report also the distance is 8mm.

11. Please specify the area and zoom scan dimensions and their corresponding spatial resolutions used during the test.

Response - For the area (course) scans, the dimensions used were 6.4mm in the x and y polarities and 3.5mm in the z direction. For the zoom (fine) scans, the dimensions used were 4mm in the x and y polarities and the same 3.5mm in the z direction.

12. It appears that uncertainty budget for the system verification has not been supplied. Only the budget for SAR evaluation is shown on Pg 34. Please clarify. Also the expanded uncertainty is listed as 25.9%, whereas calculation under the table shows 27.5%.

Response - Updated to the report (EMC15036-SAR FCC)

13. Please clarify if the scanner has been connected to the device during the SAR test?

Response - Yes

Best Regards,
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