

Jon Hughes

From: oetech@fccsun27w.fcc.gov
Sent: Thursday, November 03, 2011 7:14 AM
To: Jon Hughes
Subject: Response to Inquiry to FCC (Tracking Number 942235)
Categories: Blue Category
Attachments: "AVG certification".txt



Office of Engineering and Technology

Inquiry:

--Reply from Customer on 11/02/2011--

Celltech response to FCC 11/02/11

Please refer to the attached response from the applicant (MaxID Corporation).

Thank you.

Attachment

Maxid response to FCC comments 110211.pdf

Response:

The manufacturer is probably at a better position to decide what are the device's potential applications due to its knowledge of targeted customers, distribution channel, sale price, available accessory, and other technical information such as battery life (when used in 3G or WiFi mode exclusively) and CPU/peripheral capability. With the manufacturer's reply that extended period of transmission is possible, despite "unlikely", we would tend to suggest to do SAR and to follow KDB 447498 4c). After all, for example, some people use cell phones only sparsely and yet we require cell phones to be tested for SAR and often at worst case scenarios that some users may rarely or ever use.

The manufacturer may also choose to make a case against SAR test or certain test conditions by presenting convincing arguments and attestation letters that those RF exposure situations are not the device's allowed or typical usage. If the manufacturer chooses this route, this argument should be presented when all designs are final and all certification document ready (e.g., EMC test data, manual, operational description, schematics, product DM/specification, etc.). Without a complete picture of the device, we cannot exempt the device from SAR in advance.

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[antenna to antenna distances](#)

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Jon Hughes

From: oetech@fccsun27w.fcc.gov
Sent: Monday, October 17, 2011 1:20 PM
To: Jon Hughes
Subject: Response to Inquiry to FCC (Tracking Number 942235)
Follow Up Flag: Follow up
Flag Status: Red
Categories: Blue Category
Attachments: "AVG certification".txt



Office of Engineering and Technology

Inquiry:

Celltech Labs hereby requests the Commission's guidance to determine if a SAR evaluation is required for FCC Certification of the hand-held computer described herein, in accordance with KDB Publication 447498 Section 4) c) iii) (1) and/or (3).

Thank you for your prompt attention to this matter.

Response:

Whether SAR evaluation is required for the EUT, and, if so, in what operation modes and under what test conditions depend on the usage. Although the device is handheld when it is doing fingerprinting, scanning, and photo taking, it may or may not still be considered a handheld when its radio transmitters are transmitting. Therefore, what we need to find out is when and which transmitters will be transmitting as well as the proper test distance and relative position with the phantom in those usage scenarios.

We tried but could not find answers in the operational description and the user's manual detail on when/how to transmit stored data. How often the device can/should ?dump? data to external database? Can this transmission take place continuously or over a long period of time, made possible by DC input, docking, and 2850 mAh battery? What is the worst case average power and duty cycle combination for the transmission? What would be the typical distance between human body and the device at time of transmission?

If the radio transmission only occurs sparsely, the device may be qualified for low duty cycle exemption from SAR (PBA required). On the other hand, since the device supports Windows CE operation system, third party application software can be easily developed to turn the device into, e.g., a held-to-ear voice communicator given that speaker and microphone are both available according to the block diagram. Or a third-party app can utilize the camera to make the device send out continuous surveillance JPEG image data (or Motion JPEG or even MPEG). In the former case, head position SAR would be required unless the manufacturer can effectively block the application. For the latter example, a high bandwidth GPRS mode may be required resulting in high duty cycle at high output power and at a distance typical for a camera.

In summary, whether the EUT can be exempted from SAR, or is subject to head/body SAR as described in KDB 447498 4)c)iii)(1) and (3) for handheld devices, or even the head SAR will be determined by the usage. Please describe usage scenarios in certification application in the context of radio transmission base on device capability and foreseeable applications. In addition, if there is no real need to support

simultaneous transmission, especially the higher power ones (WWAN and WLAN), the applicant can consider blocking that capability all together since it is already claimed to be ?unlikely? in the Cover Letter.

If the manufacturer intends to provide a hardware and software platform which enables various additional security applications, then it must be evaluated by the worst case applications.

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