



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

May 7, 2007

RE: HandEra Inc. FCC ID: URZ-WF10020

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The FCC ID is required to be contained on a single line (reference 2.925(a)(1)):

(1) FCC Identifier consisting of the two elements in the exact order specified in §2.926. The FCC Identifier shall be preceded by the term *FCC ID* in capital letters on a single line, and shall be of a type size large enough to be legible without the aid of magnification.

Please correct.

Response: Please see the revised label exhibit uploaded with this response.

2) Since this approval is considered modular, please adjust the following exhibits:

a) Per our previous conversations, I believe the intent here is a Limited Modular Approval. Therefore the modular letter should specifically ask for limited modular approval as appropriate and clearly denote that it is understood that in the case of portable devices – a permissive change application and SAR data would be required for each host. Additionally it should clarify if also asking for mobile approval here as well.

Response: Please see the revised modular approval letter uploaded with this response.

b) The internal photographs should be adjusted into 2 files. One for the EUT (module), the other the current file is already acceptable to show it as tested.

Response: Please see the revised internal photograph exhibits uploaded with this response.

c) Adjust the block diagram to only provide the modular block diagram.

Response: Please see the revised block diagram uploaded with this response.

3) Item 5 of the modular approval letter does not appear to make sense. Please review.

Response: Please see the revised modular approval letter uploaded with this response.

4) If the intent of this approval is for a Modular or Limited Modular approval, the manual should be for the module itself and not the host device. Please provide.

Response: Please see the revised user's manual exhibit uploaded with this response.

5) I believe the EUT is still the module, but the report suggests it is the whole device. Please adjust.

Response: The EUT is indeed the module. The report clearly states the intent of the application in section 1.4.

6) Limits in table 5-2 do not appear correct. Please review.

Response: Please see the revised test report uploaded with this response.

7) Tables 9-3 through 9-5 and 9-7 through 9-9 suggest a 6.6 dB average factor. However the FCC has stated that WLAN devices can not adequately be determined for worse case duty factor in 100 msec. The only way an averaging factor could be applied is if the device had an integrated source based factor to ensure that this averaging is obtain in any worse case 100 msec period of time. Generally WLAN contains burst modes and other features which can not assure these can be met. Please review.

Response: Per FCC 97-114, "Guidance on Measurements for Direct Sequence Spread Spectrum systems", under (2) of the section covering 15.247(c), "...If the emission is pulsed, modify the unit for continuous operation, use the settings shown above, then correct the reading by subtracting the peak-average correction factor, derived from the appropriate duty cycle calculation..." This technique was used to derive the average measurements from the peak measured from the continuous transmission.

8) Power output in SAR report appears significantly different. FCC expects power to be measured within +0 to +0.5 dB. It appears power may have been measured EIRP, but EMC report conducted. FCC requires assurance that power was \geq EMC power and with 0.5 dB conducted. Please review/correct/explain as necessary.

Response: Please refer to the revised SAR report uploaded with this response.

9) SAR test data does not appear to follow P1528 (Figure 13) which suggests testing on middle channel first and then checking for less than -3 dB below the limit. Testing only appears at the low channel. Please review, explain, correct as necessary.

Response: Please refer to the revised SAR report uploaded with this response.

10) Host users manual should support use of proper accessories and/or body spacings. Please correct. Users manual cites not spacing is necessary, but it does not appear that body worn was tested at 0 spacing. It appears it was tested in a specific holster. Proper guidance should be provided.

Response: Please refer to revised user manual exhibit uploaded with this response.

11) SAR report does not appear to a) report probe tip to inner surface during measurements, b) explain if the distance between the measurement point (distance + offset) at the probe sensor location (geometric center behind the probe tip) and the phantom surface is < 8.0 mm and maintained at a constant distance of ± 1.0 mm during an area scan to determine peak SAR locations as required by FCC, and c) explain if the first 2 measurements points in a zoom scan, closest to the phantom surface, are within 1 cm of the surface as required by the FCC.

Response: Most of the information was included in the report. Zoom scan reference has now been added to complete the question response. All the information in response to the question is located on pages 4, 5, and 6 of the revised report. Page 4 provides the repeatability of the probe position (± 0.5 mm). The area scan was performed with the probe sensors located 5 mm from the phantom surface (± 0.5 mm). The zoom scan has the first measurement at 2 mm and the 2nd at 7 mm.



[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.