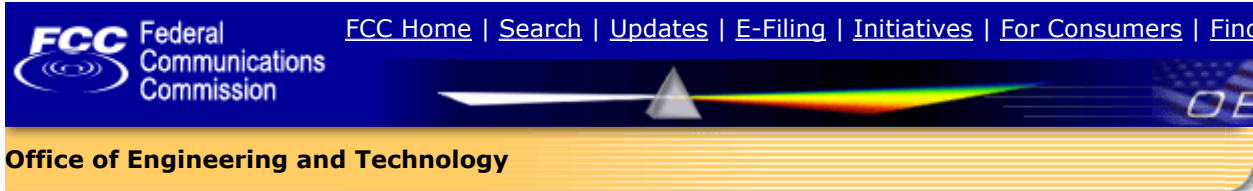


Mark Briggs

From: oetech@fccsun27w.fcc.gov
Sent: Monday, August 31, 2009 10:57 AM
To: Mark Briggs
Subject: Response to Inquiry to FCC (Tracking Number 208447)

**Inquiry:**

---Reply from Customer on 08/24/2009---

Re-submitting as requested Since filing the original inquiry there has been a change. The actual cell modem module that will now be integrated into the device is different. I have updated the test plan and all of the rf exposure information to match the new antenna and module information. I do not believe that the changes affect your previous interpretation that: 1) No stand-alone SAR will be required with source-based time-averaged conducted output power below thresholds of KDB 447498 item 4) c) iii) (1); 2) Simultaneous transmit SAR evaluation for hand exposures will not be required; 3) The C2PC for the module will include the rf exposure information contained in the attached test plan plus test data showing the measured ERP/EIRP for pt22/24 mobile-station in the specific final product. Thanks for your attention to this. Mark

Response:

8/31/09

VSF19782MX WLAN
 VSF19799AR BT
 AU792U05E06800 WWAN

A) last reply to inquiry response includes:

- 1) No stand-alone SAR will be required with source-based time-averaged conducted output power below thresholds of KDB 447498 item 4) c) iii) (1);
- 2) Simultaneous transmit SAR evaluation for hand exposures will not be required;
- 3) The C2PC for the module will include the rf exposure information contained in the attached test plan plus test data showing the measured ERP/EIRP for pt22/24 mobile-station in the specific final product

we did not check all math in attached, but in general above seems correct

B) page 1 of latest att. includes following:

RF exposure evaluations were limited to MPE calculations based on the following:

- The host system is for hand-held use with no body-worn accessories;
- The expected operating conditions would ensure at least a 20cm separation from the WLAN and Bluetooth antennas from the body;
- The Bluetooth modules output power and eirp were both below the $(60/f)$ threshold;
- The WLAN output power and eirp were both below the $300 \cdot [f(\text{GHz})]^{-0.5}$ and $1000 \cdot [f(\text{GHz})]^{-0.5}$ thresholds detailed in KDB 447498 section 4(c);
- The separation distance between WLAN and Bluetooth antennas exceeded 5cm;
- KDB response form the FCC reference KDB tracking number 458876.

9/10/2009

remarks

- although filing can include MPE estimation to address exposures to persons' bodies due to operation of the handheld hand-operated device, please ensure filing is clear device is still considered to operate in portable exposure conditions, ie because user's hand is within 20 cm from device
- above mentions radiated power - thresholds in KDB 447498 are in terms of source-based time-averaged conducted power
- response from KDB 458876 is mentioned - we did not check that for purposes of this reply

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.