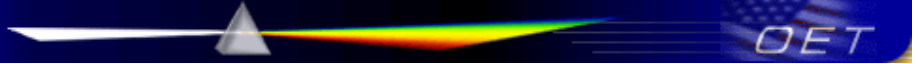


Mark Briggs

From: oetech@fccsun27w.fcc.gov
Sent: Monday, May 24, 2010 11:25 AM
To: Mark Briggs
Subject: Response to Inquiry to FCC (Tracking Number 222340)



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Office of Engineering and Technology

Inquiry:

This is an inquiry to confirm that no SAR is required for a GSM module being used in a specific host device that is hand-held/hand-operated but has no provisions for being body-worn. The same proposal for rf exposure evaluation was submitted for the same device, however the latest version uses a different GSM module with lightly different antenna-to-hand spacings and antenna-to-antenna spacings (there are Bluetooth and WLAN co-located transmitters). The original KDB was filed under KDB 208447.

The product description and the rationale being proposed to avoid SAR testing is provided as an attachment to this message.

Many thanks

Mark

Response:

5/24/10

First category: Radio Frequency Exposure - MPE; SAR

Second category: Portable - Part 2.1093

Third category: Non-handset SAR

Subject: GSM module in hand-held/hand-operated device

remarks:

1) we note fig1 caption "GPS only on Right" appears to be incorrect, i.e. should be GSM only

2) we note this wording at pg4 seems a little awkward or misleading:

"For devices that could be within 5cm of the hand (but > 5cm from the body) ..."

i.e. better to say it like following or similar:

"For hand-held and hand-operated devices operating with antenna within 5cm of the hand (but > 5cm from the body) ..."

3) concerning WWAN power and transmit slots at pg5, please expand analysis as appropriate to address all modes and consistent with all attachments at KDB pub. 941225

e.g.

"... the maximum burst-averaged output power for each mode (GMS/GPRS/EDGE) and the corresponding multi-slot class must be clearly identified in the SAR report for each frequency band."

4) at pg6 please change from "For whole-body exposure an MPE ..." to "For body exposure an MPE ..."

5) TCB processing for C2pc to fccid VSF22779 may proceed without PBA, and including SAR exclusion analysis based on attached and with remarks herein accounted for. Please also notify TCB to list instant KDB number as associated (non-PBA) in the Form-731.

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.