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### Reply to an OET Inquiry Response

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#### Contact Information:

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Line 1: **No. 134, Wu Kung Road, Wuku Industrial Zone,**  
Line 2:  
P.O. Box:  
City: **Taipei County**  
State:  
Zip Code: **24803**  
Country: **Taiwan**

#### Inquiry Details:

First Inquiry Category: **Radio Frequency Exposure - MPE; SAR**  
Second Inquiry Category: **Portable - Part 2.1093**  
Third Inquiry Category: **Non-handset SAR**

Applicant: Netcomm  
FCC ID: Intends to apply  
Model No: My Zone  
Type: Original composite application  
Product Description : Battery Operated Personal Wireless Router equipped with WWAN 3G module and WLAN 802.11 b/g module.

Applicable FCC guideline:

A. Part22/24, 15.247,

B. 2.1093

Attached please find SAR Preliminary Analysis Test Plan

Request : The applicant and testing lab is requesting your guidance and advisement to perform SAR test on Battery Operated Personal Wireless Router

**---Reply from Customer on 08/19/2010---**

this is reactivate by FCC to amend

**---Reply from Customer on 08/19/2010---**

Dear Sir,

Thanks for your kindness elaborating on the instruction.

There are several points at which I need to be very clear before performing SAR test. Given the procedure number 1, the separation between phantom and EUT looks it can be extended to 1.0cm, does it apply to all surface? I define the surface of test plan in the PDF document I've attached. Looking the plot, WWAN Antenna is located at the right edge near the top.

Based upon the procedure 2 you instruct us, surface of right edge and surface of the top shall perform the SAR with no doubt.

How about the surface of the back and surface of the right for my defined item? Shall they be tested as well, and capable of testing at 1.0cm separation at maximum?

Sincerely,

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**Response(s):**

**--OET response sent on Aug 19 2010 10:44AM--**

8/19/10

The following procedures should be used to address SAR compliance for battery-operated hotspot / router devices in portable exposure conditions.

1. When the smaller of the length and width of the device is  $\geq 2\lambda$ , a test separation  $\geq 1.0$  cm may be used to test for SAR compliance. A test separation distance  $\geq 0.75$  cm should be used when the smaller dimension (length & width) is  $< 2\lambda$ .

2. SAR should be tested for the highest output power channel, on the each surface and edge closest to the antenna(s) for each operating mode and band. For example, if the 3GWWAN antenna is near the top surface and on the right side of the device, SAR should be tested with the required separation distance from the top surface and then the right edge of the device. Similar

procedures should be applied with respect to the Wi-Fi/WLAN antenna location(s).

3. Simultaneous transmission SAR requirements should be determined according to the handset SAR procedures in KDB 648474 for test exclusion with respect to the sum of 1-g SAR or SAR to peak location ratio. When simultaneous transmission SAR evaluation is required, a volume scan is required.

4. User instructions and, if necessary, any labeling requirements, and grant conditions will be determined according to the measurement results.

**--OET response sent on Aug 19 2010 10:50AM--**  
8/19/10

THIS RESPONSE REPLACES THE PREVIOUS RESPONSE SENT TODAY

The following procedures should be used to address SAR compliance for battery-operated hotspot / router devices in portable exposure conditions.

1. A test separation less than or equal to 1.0 cm may be used to test for SAR compliance.

2. SAR should be tested for the highest output power channel, for each surface and edge closest to the antenna(s) for each operating mode and band. For example, if a WWAN antenna is near the top surface and on the right side of the device, SAR should be tested with the required separation distance from the top surface and then the right edge of the device. Similar procedures should be applied with respect to the WLAN antenna location(s).

3. Simultaneous transmission SAR requirements should be determined according to the handset SAR procedures in KDB 648474 for test exclusion with respect to the sum of 1-g SAR or SAR to peak location ratio. When simultaneous transmission SAR evaluation is required, a volume scan is required.

4. User instructions and, if necessary, any labeling requirements, and grant conditions will be determined according to the measurement results.

**--OET response sent on Aug 20 2010 3:09PM--**  
8/20/10

1) SAR testing with 1 cm spacing to phantom is requested for top/front & back/bottom & edge, all closest to antenna

2) device appears to have "prop stand" for e.g. tabletop use  
- if stand can be easily removed by user and without destroying the product, 1 cm for "back/bottom" should be spacing to device enclosure not spacing to back of folded-down prop-stand

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Sincerely,

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Please send any comments or suggestions for this site to [OET Systems Support](#)

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