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RF Exposure Considerations for FCC ID: XKB-IWL2XX3GCL

FCC ID: XKB-IWL2XX3GCL contains a GSM GPRS/ EDGE/ UMTS HSDPA data only transmitter module (FCC ID: VW3HILO3G) used within a Point of Sales Terminal which is a handheld device. This transmitter operates in the GSM850, PCS1900 and UMTS II operating bands and has GPRS/ EDGE Class 12 operation.

Considerations for proximity of equipment user's hand to the equipment

KDB447498 D01 v04

Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies.

4) SAR test positions and requirements for specific host platforms and exposure conditions

c) Extremity and body SAR evaluation considerations

iii) Contact the FCC Laboratory to determine whether:

(1) Hand SAR is required for hand-held and hand-operated devices with output power > $1000 \cdot [f_{\text{GHz}}]^{0.5}$ mW that are designed with the hand operating closer than 5 cm from the antenna during normal use.

For FCC ID: XKB-IWL2XX3GCL

Specified maximum output power = 33 dBm @ 850 MHz
 = 30 dBm @ 1900 MHz
 = 24 dBm @ UMTS

Frequency (GHz)	IWL255-01T1543A	Max. output power mW (conducted)	$1000 * [f \text{ GHz}]^{-0.5}$ mW	SAR Testing Required
0.85	UMTS	250	1,085	No
1.9	UMTS	250	726	No
0.85	GPRS	$2000/2= 1,000^*$	1085	No
1.9	GPRS	$1000/2= 500^*$	726	No

* Per KDB 447498 D01 Mobile Portable RF Exposure v04, "... Unless otherwise specified, the power thresholds in this document are applied for conducted output power with respect to the source-based time-averaged output power defined in §§ 2.1091(d)(2) and 2.1093(d)(5) of the rules."

GPRS Class 12 used in FCC ID: XKB-IWL2XX3GCL which qualifies for a source-based time-averaged factor of 4/8.

(2) Extremity SAR is required for wrist, feet or ankle worn devices.

Not Applicable for FCC ID: XKB-IWL2XX3GCL as the device is not wrist, foot or ankle worn.

(3) Body SAR is required for hand-held and hand-operated or wrist, feet and ankle worn devices that

operate closer than 5 cm to the body and the output power is $> 300 \cdot [f(\text{GHz})]^{-0.5} \text{ mW}$.

Not Applicable for FCC ID: XKB-IWL2XX3GCL as the device is greater than 5cm away from the body in normal operation i.e. during transmission.

Conclusion

The considerations for FCC ID: XKB-IWL2XX3GCL in accordance with FCC KDB 447498 D01 v04, Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies confirms that RF exposure SAR testing is not required for normal handheld operation of the equipment.