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**From:** oetech@fccsun27w.fcc.gov  
**Sent:** Friday, April 20, 2012 12:28 PM  
**To:** Thierry Jean-Charles  
**Subject:** Response to Inquiry to FCC (Tracking Number 390029)



**Inquiry on 04/16/2012:**

Per FCC guidance in March 13, 2012 conference call, for any portable devices subject to 2.1093 routine evaluation, TCBs (or applicant / agent before submitting to TCB) must consult with FCC via KDB inquiry before granting any filings that do not contain SAR measurement reports, regardless of whether power is below 60/f (examples include U-PCS, WMTS portable devices).

The purpose of this KDB is to request permission from the commission to file the RANGE-R (FCC ID: YKD-25TWD3000) for a class II permissive change for co-location with an 802.11b/g/n WiFi module (FCC ID: XF6-RS9110N1102) without a SAR evaluation.

The RANGE-R is a highly sensitive, portable, handheld, battery operated system designed to detect moving and near stationary personnel through walls constructed of common building materials. Anticipated uses of the RANGE-R? system include room clearance operations and victim location by search and rescue personnel engaged in disaster recovery efforts. The RANGE-R is handheld only with no body-worn accessories.

The RANGE-R transmits a maximum 32 mW with no modulation. Per KDB 447498 section 4(c), the RANGE-R is excluded from hand SAR based on maximum output power  $< 1000 \cdot [f(\text{GHz})]^{-0.5}$  mW. With a maximum operating frequency of 3.42 GHz, the power threshold per KDB 447498 section 4(c) is equivalent to 541 mW.

The 802.11b/g/n WiFi module (FCC ID: XF6-RS9110N1102) has a maximum output power of 40.4 mW based on a conducted power measurement. The WiFi module operates from 2412 MHz to 2462 MHz, the power threshold per KDB 447498 section 4(c) is equivalent to 637 mW.

Both the RANGE-R and WiFi module can transmit simultaneously but only in a handheld operating configuration.

**Response on 04/20/2012:**

You may proceed with the application for a Class 2 Permissive Change to collocate the identified WiFi module (FCC ID XF6-RS9110N1102) with the RANGE-R (FCC ID YKD-25TWD3000) omitting the SAR report. Please reference this KDB inquiry in the application.

Please be reminded that the conditions of the waiver issued for the RANGE-R apply to the C2PC and reference to the waiver should be included in the grant notes.

This request has been evaluated using the SAR exclusion evaluation for extremities presently provided in KDB447498. Please be advised that several FCC publications are undergoing revision and are expected to be released in draft form shortly. One of the revisions to KDB447498 concerns SAR exclusion for extremity exposure conditions. Please reference the most recent version of that document for any future requests.

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