

September 15, 2006  
Control No. for Handset : PCTP-06-F017

Subject: Handset Unit, Model KX-WPA100  
FCC ID: ACJ96NKX-WP1050A  
Assessment No.: AN06T6104  
Notice No.: 1

Dear Helen Zhao / CCS

Question #1: This device is an 802.11b/g device, but the user manual only mentions 802.11b. You may need to update the user manual.

Answer #1: The user manual affected pages were amended to reflect the base and handset supports 802.11b/g. Refer to uploaded amended user manual.

Question #2: The user manual does not contain body-worn operation restriction statement. Please add the following statement into the user manual: "For body-worn operation, the phone meets FCC RF exposure guidelines provided that it is used with a non-metallic accessory. Use of other accessories may not ensure compliance with FCC RF exposure guidelines."

Answer #2: The user manual RF Exposure Requirements statement will be amended to reflect the following type wording. Refer to uploaded amended user manual.

FCC RF Exposure Warnings:

- This product complies with FCC radiation exposure limits set forth for an uncontrolled environment.
- To comply with FCC RF exposure requirements, the base unit must be installed and operated with its antenna located 20 cm (8 inches) or more between product and all person's body (excluding extremities of hands, wrist and feet).
- This product may not be co-located or operated in conjunction with any other antenna or transmitter.
- For body-worn operation, the handset must be used only with a non-metallic accessory. Use of other accessories may not ensure compliance with FCC RF exposure requirements.

Question #3: This hand unit has built-in battery, in normal operation, the device is powered by battery. But the SAR test was done when the hand unit was in charging mode, not in normal operation, which is not acceptable. Based upon OET65 Supplement C page 45, "Most handsets and portable transmitters are battery operated. The devices should operate with a fully charged battery for each SAR test... Unless an external DC power adapter or other signal leads are required for the normal operation of a device, such as connecting a headset to the device for body-worn use, they should not be used in the SAR tests." When the USB cable is connected to PC, it will affect hot spot location and/or SAR value. Please redo SAR test when the hand unit operates with a fully charged battery and without USB cable connected.

Answer #3: The provided complete SAR test report used connected USB cable to guarantee the battery capacity remained at its maximum potential to provide maximum RF output power during the SAR testing. Our engineering judgment was that the USB cable was not near the RF circuitry and antenna and as such, the employed USB cable should have little or no sufficient influence upon SAR test reports. However, we now understand FCC demands portable handset's SAR test report must be preformed with fully charged battery and without any USB cable connected. Refer to uploaded additional SAR test results performed using multiple fully charged batteries and with no USB cable connected. These additional test results confirm there is no sufficient different between the initial and additional SAR test results.

Question #4: This is for your information. This application requires short term confidentiality on EUT photos, however, the test setup photos as well as SAR test report still show EUT photos, if you want to keep them confidential as well, please extract EUT photos and SAR test setup photos from the SAR report and submit as a separate document. Please resend Request for confidentiality letter (to add EMC test setup photos, SAR test setup photos), SAR test report (without photos) and SAR test setup photos.

Answer #4: Refer to uploaded amend Request for Confidentiality letter, which includes request for confidentiality for Appendix 3 for antenna specifications and short-term confidentiality for test set-up photographs.

Question #5: This is for your information. Since Base Unit and Hand Unit are not sharing the same FCC ID, in future, please separate test data of Base Unit from that of Hand Unit, i.e. submit one test report for Base Unit, one report for Hand Unit.

Answer #5: We understand that as the base unit and handset units have different FCC ID's that their associated FCC Part 15C test reports should be separated into separate test reports. In the future, we will separate these type reports into separate reports under separate FCC ID's.

Sincerely,

*Richard Mullen*

Richard Mullen  
Group Manager