FCC ID: ALH413801
IC ID: 282D-413801
CT Project: P1420012

From: Chris Harvey
Date: 3/18/14

1. The original approval of this device was issued on 9/14/2010. It is not clear that this device meets the Spectrum efficiency requirements of 90.203 (has only 11K0F3E and 16K0F3E emissions). Additional information may be necessary to process a C2PC for this application showing requirements that need to be met.

CT – All radios are subject to the narrow banding rules and this is no different. The new grant will indicate only the currently emission bandwidths allowed under the 90.203 spectrum efficiency rules. The radios are not end user programmable therefore they cannot operate outside of those requirements. As you know Canada still allows 16K0F3E and is capable of using the wideband emission only outside the US.

2. The RF report does not indicate why the radiated test is being performed in this C2PC, and indicates that no accessories were used or which of the batteries and/or antennas which are part of this C2PC have been included and/or tested.

CT – The Class 2 Permissive Change cover letter explains the accessories changed. Since the antenna addition is the only change that would affect the RF emissions, Radiated measurements were taken.

3. The original SAR values were listed as:
The highest reported SAR values at 50% duty factor are - Face: 6.30 W/kg; Body-worn: 7.25 W/kg.
The C2PC SAR values are reported as:
The highest reported SAR for head and body-worn accessory in this C2PC filing are 2.02 W/kg and 2.76 W/kg, respectively.
Please explain why the SAR values in this C2PC filing are so much lower than the original filing.

CT - The difference could just be due to the different antenna. The new antenna may not have as high of currents in the near field as the original antenna. This would give a lower SAR value.

Response by: Compliance Testing LLC

Submitted by: CTL

Date: 3/27/14