

October 7, 2006

Federal Communications Commission
Equipment Approval Services
P.O. Box 35815
Pittsburgh, PA 15251-3315

Applicant: Lectrosonics, Inc.
581 Laser Road
Rio Rancho, NM 87124

Re: Response to Correspondence reference number 31724

Equipment: FCC ID: DBZUM450M, 731-confirmation number EA158081

Gentlemen:

A portion of the correspondence requesting additional information is shown below for reference. The response to this request is addressed below for your consideration.

Request

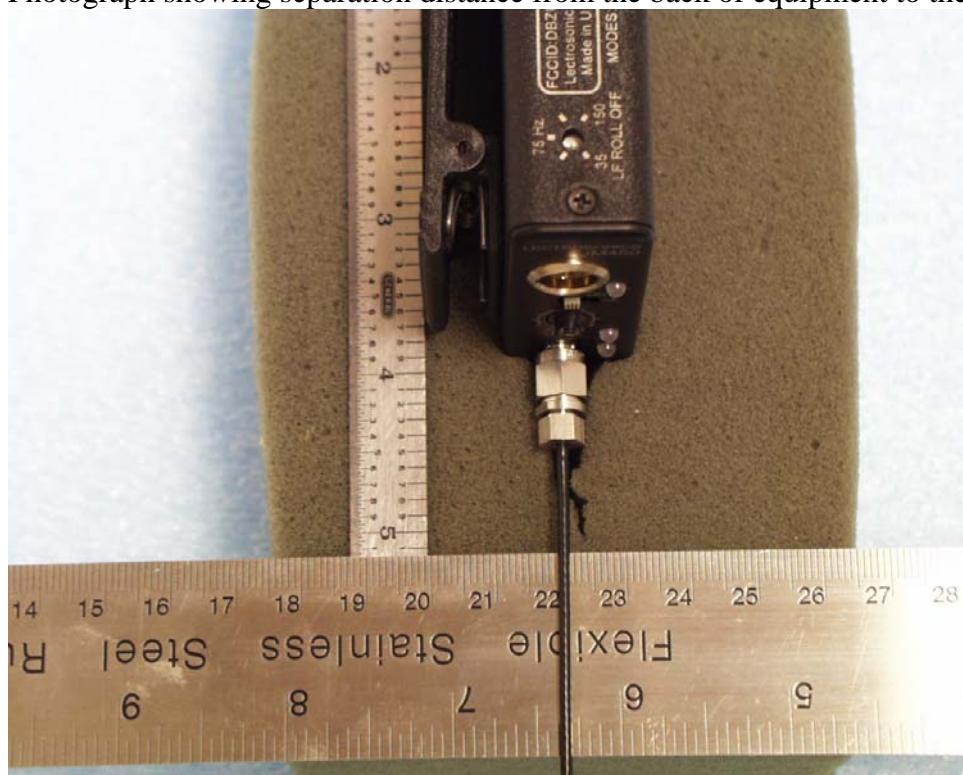
Regarding compliance with FCC RF exposure requirements, MPE estimation is submitted in this filing. FCC RF exposure limits for devices operating closer than 20 cm to persons are in terms of SAR, therefore MPE estimation is not applicable for compliance demonstration of portable devices.

To support FCC RF exposure compliance determination, please submit photos and/or sketches for product with antenna installed showing spacings between the plane of the back of the belt-clip to: a) the back of the device, b) the closest point(s) of installed-antenna(s) FCC will then review all filing info to determine whether other info may need to be requested to support compliance with RF exposure requirements as applicable for all transmitters regulated by FCC. It may help to expedite this review if applicant has available and wishes to voluntarily submit SAR test results for this specific product

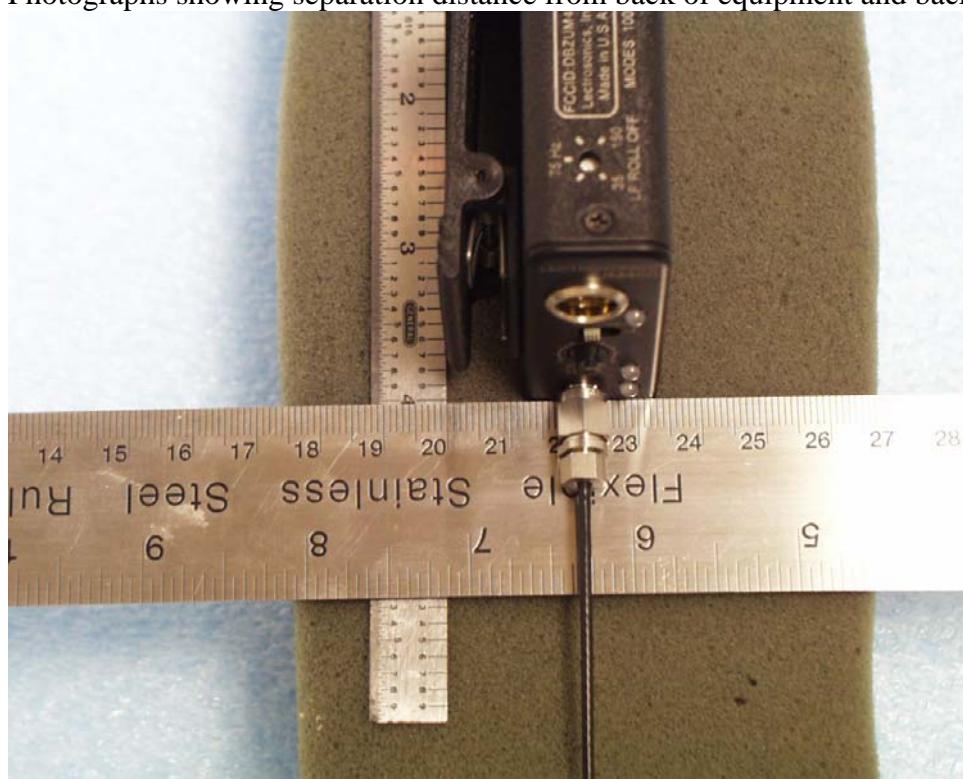
Response

Below please find relevant photographs per your request demonstrating spacing between the back of the device and antenna, and the back of the clip and antenna.

Photograph showing separation distance from the back of equipment to the antenna.



Photographs showing separation distance from back of equipment and back of belt clip to antenna.



Additional discussion

From our understanding of CFR47 requirements as discussed below, it appears this equipment is categorically excluded from the SARS requirement. CFR47 1.1307(b)(1) suggests: "... transmitters that fall into the categories listed in table 1, or those specified in paragraph (b)(2) of this section." In table 1 the entry for part 74 services, references evaluation is required only for Subparts A, G, L (power > 100 W ERP), and Subpart I antennas (power > 1640 W EIRP). However, Subpart H governs this equipment. In paragraph (b)(2), references equipment covered under Subpart H of parts 22, 24, 25, 26, 27, 80, and 90 but NOT part 74. The paragraph ends with the declaration: "All other mobile, portable, and unlicensed transmitting devices are categorically excluded from routine environmental evaluation for RF exposure under SS 2.1091, 2.1093 of this chapter except as specified in paragraphs (c) and (d) of this section." Paragraph (d) maintains the statement to the effect that if the Bureau responsible for processing an action that is categorically excluded happens to think that the proposal may result in significant environmental impact, then it may require evaluation "on its own motion".

However, for our own assurance that it complies with SARS requirements, we did have the 250 milli-Watt SMQ transmitter tested for SARS compliance in the higher frequency bands. The SAR data taken for the SMQ device represents the worst-case configuration for this type of body worn equipment with respect to spacing, power level, and frequencies of operation.

Correspondence with the SAR testing facility indicated testing of the equipment in the higher frequency typically produced the worst case SAR data and demonstrates compliance for lower frequencies of operation. Therefore, only the higher frequency units were tested for SARS compliance. Please find the SAR test report attached for your review. The report demonstrates compliance for occupational use.

Additionally, the circuitry design is identical for other equipment designs of Lectrosonics products such as the UM450 transmitter. Changes to the case enclosure and belt clip offer the ability for alternative power (9-volt battery) for the transmitter design. The transmitter circuitry does not change and thus the reported SAR data should also be considered as representative of this and other Lectrosonics designs.

Please review this information and continue processing the application for grant of certification.

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,

Scot D Rogers

Scot Rogers
Rogers Labs, Inc.
Enclosures