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To : Diane Poole, Stan Lyles
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FCC Application Processing Branch

Re: FCC ID ESN-SP70
Applicant: Kinpo Electronics Inc
Correspondence Reference Number: 31002 and 30993
731 Confirmation Number: EA219890 and 796830

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FCC question:

1) Simple SAR summation technique for collocation requires addition of highest SAR on file which is 1.33 for DTS. Using this value summation shows values over the compliance limit. Please address.

Answer:

The 1.33W/kg SAR body value was obtained for a separation distance of 0cm from the phantom as documented in the original filing.

The original filing was revised for consistency with this Class 2 Permissive Change. The following exhibits were updated:

- SAR report shows data for 1.5cm gap between phantom and device.
- User's manual lists the new maximum SAR value at 1.5cm separation distance.
- Grant notes were revised to list the new maximum SAR value at 1.5cm.

Here are the test results for Body at 1.5cm gap:

$SAR\ DTS + SAR\ PCE = 0.122W/kg + 0.651W/kg = 0.773W/kg < 1.6W/kg$

Best regards,

Bruno Clavier
TIMCO ENGINEERING INC.