



## Response to Inquiry to FCC (Tracking Number 821253) (TCB)

2 messages

oetech@fccsun27w.fcc.gov <oetech@fccsun27w.fcc.gov>

Wed, Jan 23, 2013 at 8:58 AM

To: "LST.FRE.Cert Notice" <LST.FRE.CertNotice@ul.com>, "tim.dwyer@ul.com" <tim.dwyer@ul.com>



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Office of Engineering and Technology

**Inquiry on 01/10/2013 :**

**Inquiry:**

We are processing a C2PC request for FCCID: GKR-TP00042AHB, COMPAL ELECTRONICS, INC.

Our main questions are in items 8 & 9 (**bold**) below. Other items are included as background information, but comments are welcome.

1. The original grant date was 20121025 and was subject to PBA guidance under KDB 482582.

2. The C2PC application is to implement alternate WWAN antennas. Other hardware including the proximity sensors (cause for initial PBA) remain unchanged.

3. TCB reviewed and returned questions for the C2PC, the latest of which were returned to the applicant on 20121217. The general nature of the 20121217 questions was to correct typographical errors and minor omissions from the RF test reports, and missing test setup photos.

4. The SAR evaluation had followed earlier PBA guidance and was deemed acceptable as of 20121217, after initial review and response to TCB questions.

5. Grant was deemed at that time to be acceptable without additional PBA due to having followed previous guidance pending acceptable response to additional questions sent on 20121217. Response to the 20121217 questions was received by the TCB on 20130107 after the transition date for the new KDB's. A copy of the 20121217 questions with 20130107 reply is attached for information.

6. Although the SAR evaluation exhibits received follow previous PBA guidance, they were prepared according to the previous versions of KDB 447498 and 616217. We have already returned an initial response to the applicant indicating the requirement to update the reports to the latest versions.

7. Summarized changes that would be required to the SAR reports (1 each for WLAN and WWAN) would

include evaluation of proximity sensors according to KDB 616217 D04 v01 Section 6 and reporting of scaled SAR. The WLAN report did not report scaled SAR as was acceptable prior to 20121231. The WWAN report did not report scaled SAR values per se, but did include an analysis to demonstrate compliance under maximum power tolerance.

**8. According to TCB understanding, this application is subject to the new requirements of KDB 447498 D01 v05 and KDB 616217 D04 v01.**

**9. Additionally, if update to the current KDB's is required, then technically the previous guidance is not applicable, so it is our understanding that PBA would now be required for approval. Please note that the change is to the antennas, and not to the proximity sensors.**

10. We believe the applicant may be in the process of contacting FCC directly on this matter and so would like to clarify/confirm whether update of the SAR reports to the latest KDB's is necessary in this case and whether additional PBA is necessary.

11. We are also processing a second nearly identical C2PC under FCCID: GKR-TP00042AHJ (PBA 430310) pending due to the identical situation described above. We will apply your response to this inquiry to that application as well.

11. Your earliest reply is appreciated. If further information is needed, please ask.

Best regards,

Tim Dwyer

Technical Reviewer

ULCCS TCB

**FCC response on 01/15/2013**

The deadline for using older versions of published RF exposure KDB procedures expired on 12/31/2012. And the cutoff is based on the filing (creation) of Form 731, which was communicated with TCBs in advance.

Exceptions can be considered with a KDB inquiry if the following three conditions are met:

1. The TCB process must have been started prior to January 1, 2013. This means that the TCB must have received a complete application package

prior to that date. All, or substantially all, of the subject tests must have been completed by January 1. We may accept test dates after January 1, if the tests were done at the request of the TCB due to insufficient or deficient testing the original submittal.

2. TCB needs to provide copies of the correspondence between the TCB, test lab, and/or manufacturer demonstrating why the application could not be filed by January 1.
3. TCB needs to provide a justification for the exception, e.g., unreasonable number of additional tests, significant delays, etc.

According to your description, you may qualify for the exception. Please reply with specific information in the context of the above three criteria; especially for #3 above, TCB needs to justify the inaction in-between 12/17 and 1/7 if the issues are all administrative.

Note that each such exception must file a separate KDB inquiry. Also note that if this case fails to qualify as an exception, then PBA (proximity sensor) would be necessary, otherwise not required (see PBA KDB 388624 D01 for Permissive Changes).

**---Reply from Customer on 01/22/2013---**

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A1. The TCB received the C2PC application on Nov 02, 2012. There were several rounds of questions related to unresolved issues from the original grant PBA and an OET audit that was pending for the original grant. TCB determined it was not possible to act on the C2PC until all issues from the original grant were reconciled. Final questions were sent to the applicant on Dec 16, 2012 with additional clarification on Dec 19, 2012. The final questions were to resolve some minor administrative issues and omissions from the RF reports, and did not impact the SAR or proximity sensor evaluation. TCB anticipated a quick response with adequate time to grant prior to Dec 31, 2012.

2. TCB needs to provide copies of the correspondence between the TCB, test lab, and/or manufacturer demonstrating why the application could not be filed by January 1.

A2. Applicant did not respond to the Dec 16/19 questions until Jan 07, 2013. Applicant has provided the following additional explanation for the delay:  
Description: [https://ssl.gstatic.com/ui/v1/icons/mail/profile\\_mask2.png](https://ssl.gstatic.com/ui/v1/icons/mail/profile_mask2.png)

Tsou, Chi Description: <https://mail.google.com/mail/u/0/images/cleardot.gif>

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A3. Justification for the exception are additional tests required by the new KDB's and resultant delay. The new KDB's would require re-measurement of SAR and proximity sensor operation, and would also require PBA (additional delay) which would not have been required before Jan 01, 2012 due to original KDB guidance having been applied.

**FCC response on 01/23/2013**

Exception to using new RF exposure KDBs is approved. This approval is per FCC ID and case by case.

Consequently, a PBA is not required for this C2PC if the changes do not affect the PBA issue and all prior PBA guidance is still fully applicable. See Special Circumstance 1) Permissive Changes in KDB 388624 D01 for detail guidelines.

**Attachment Details:**

[20130107 Response by Applicant to 20121217 Questions](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.

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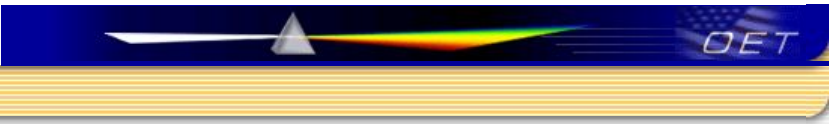
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