



March 9, 2011

Dr. Rashmi Doshi, Ph. D.
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Type Approval Testing of Mobile Phones With WiFi Router Capability.

Dear Dr. Doshi:

On behalf of the Telecommunications Industry Association (TIA), thank you for meeting with TIA and its members on February 17, 2011 to discuss type approval of mobile phones with WiFi router capability.

We greatly appreciate the efforts of you and your team at the Federal Communications Commission's (Commission) Laboratory Division (Lab Division) at the Office of Engineering and Technology (OET) to ensure that innovative mobile products are swiftly made available to the public. In sharing this goal, TIA is grateful that the Lab Division has developed a plan to certify safe WiFi router-capable mobile phones. We deeply appreciate the details provided on this matter in your email on February 24, 2011. We are grateful to have more information on how to proceed as new devices are developed.

Based upon our understanding, the Lab Division has established the following guidelines for a mobile phone previously approved under Supplement C Specific Absorption Rate (SAR) limits and subsequently enabled as WiFi router capable by means of a software upgrade. In such circumstances, a Class II Permissive Change process will be followed:

- a. If additional data submitted directly to the FCC that demonstrates that the mobile phone meets the SAR limits of Supplement C under conditions where all transmitters are operating;
- b. Phones that meet the Supplement C requirements will be granted the Class II Change approval.



Once, again, we greatly value your time and consideration in this manner. We look forward to communicating with you about future innovations to ensure compliance and speed to market.

Sincerely,

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Danielle Coffey
Vice President
Government Affairs