"Binnom, Cyril A"
<binnom.c@lxe.com>
08/22/2006 08:00 AM

To Yunus Faziloglu/USA/VERITAS@VERITAS
cc Michael Buchholz/USA/VERITAS@VERITAS, Joshua LeBlanc/USA/VERITAS@VERITAS
bcc
Subject RE: LXE, Inc. FCC ID: KDZLXE4830P TCB Questions

Please see new submitted answer to SAR question below.

Cyril

4. Issues related to measured conducted power of the device during SAR test;
i. In the SAR data summary section where SAR results are presented, the columns for the "Begin/End Power" are missing the begin levels. This does not allow a comparison between the begin and end power level differences.
ii. The end power levels listed are below the modules power level listed on its original grant and test report. How do they ensure that the modules tested provided maximum power that they are capable of? FCC prefers SAR report power level at least equal to or higher than EMC levels. Any deviation more than 5% in linear terms may invalidate the results.

The following was provided by Cyril Binnom of LXE, Inc.: "Answer below from Jay Moulton of RF Exposure Lab – (Lab that completed SAR testing)
The power was tested at the end of the testing sequence due to the fact that the device needed to be disassembled to access the RF power port. To insure the integrity of the device was maintained for all test sequences, all measurements were conducted at the end of testing. The power drift measured during each test was evaluated to insure that the power did not drift more than +/- 7% to insure the device was still transmitting at its maximum power."

[TCB] It needs to be justified how power reading at max SAR value for MX3X model(17.67dBm - Ch1) corresponds to maximum power that the device is capable of generating. The EMC report of the original module shows 18.08dBm for that channel and this corresponds to 9% difference in mW terms. Given the high reading at that channel and position, it is not clear if the device will comply if there was any deviation from max power. How did the test lab and the applicant ensure that the module was generating max power that it is capable of? This applies to all models and not only to the MX3X model.

The following was provided by Cyril Binnom of LXE, Inc.: "Answer below from Jay Moulton of RF Exposure Lab – (Lab that completed SAR testing) Submitted on 8/22/06.
The EMC report of the original module had the conducted measurements on the main antenna port only. There were no measurements on the auxiliary port. The measurements which were taken in the SAR report were conducted on both the main and aux ports. The main conducted numbers have the maximum channel at or above 18 dB on the main port which is within the 5% range. Since the aux port was not measured, we do not know what the actual power is when the main port is 18 dB. Therefore, the aux port power levels cannot be compared to the main port power levels because we do not know the internal losses of the system.

From: yfaziloglu@curtis-straus.com [mailto:yfaziloglu@curtis-straus.com]
Sent: Thursday, August 17, 2006 11:02 AM
To: Binnom, Cyril A
Cc: mbuchholz@curtis-straus.com
Subject: Fw: LXE, Inc. FCC ID: KDZLXE4830P TCB Questions

Mr. Binnom,

Following is our latest questions to Mike Buchholz regarding your application.

Best Regards,

Yunus Faziloglu
Curtis-Straus LLC
Bureau Veritas

----- Forwarded by Yunus Faziloglu/USA/VERITAS on 08/17/2006 10:57 AM -----

Yunus Faziloglu/USA/VERITAS

08/16/2006 01:45 PM

To Michael Buchholz/USA/VERITAS
cc
Subject Re: Fw: LXE, Inc. FCC ID: KDZLXE4830P TCB Questions Link

Hi Mike,

There are some issues with the documents and response. Please see my comments below.

Best Regards,

Yunus Faziloglu
Curtis-Straus LLC
Bureau Veritas

Michael Buchholz/USA/VERITAS

08/15/2006 11:39 AM

To Yunus Faziloglu/USA/VERITAS@VERITAS
cc
Subject Fw: LXE, Inc. FCC ID: KDZLXE4830P TCB Questions

Hi Yunus,

I think we have covered all of your questions.

Mike

----- Forwarded by Michael Buchholz/USA/VERITAS on 08/15/2006 11:05 AM -----

Joshua LeBlanc/USA/VERITAS

08/15/2006 10:30 AM

To Michael Buchholz/USA/VERITAS@VERITAS
cc
Subject RE: LXE, Inc. FCC ID: KDZLXE4830P TCB Questions

Mike,
I have attached below the responses to the TCB questions.

1. As discussed earlier, the best way to approach this application would be obtaining limited modular approval for the Tx module for specific hosts. With LMA, the grantee accepts the responsibility of EMC and SAR compliance of all the devices that makes use of this module. Therefore a limited modular approval request letter is needed. This letter should address LXE's intention of using the Summit module in their end-products and should acknowledge that LXE will retain full control on the installation of this module and will accept all EMC and SAR compliance responsibility for every end-device. This means any new model not specifically listed in this application will require additional evaluation and filing.

See Request_For_Limited_Modular_Approval.doc and LXE_Cover_Letter.pdf

[TCB] LXE cover letter must specify the models that will use the module under this application

2. . Drawings of labels to be used on the end devices are required in accordance with modular approval public notice, such as "Contains FCC ID: xyz...".

See Labels Attached

[TCB] Label placement photos or drawings are needed.

3. Following issues are related to the manuals;
i. Manual of each model must include the following statement in RF exposure warning sections. The current statements must be removed.
" This portable device with its antenna complies with FCC's and IC's RF exposure limits set for an

uncontrolled environment. This equipment has shown compliance with FCC's and IC's Specific Absorption Rate (SAR) limits. Highest reported SAR for {model name} is {x.x W/kg on body}. Any accessories not provided by LXE should not be used with this device. This device must not be co-located or operating in conjunction with any other antenna or transmitter"

ii. Manual should state that the device contains transmitter module FCC ID: xyz

iii. Part 15 compliance statement must be in accordance with 15.19(a)(3) word by word

See updated manuals. Manuals have 15.19(a)(3) in manual at 1st paragraph of Regulatory Notices and Safety Information

[TCB] Please clarify the following issues with the applicant,
i. SAR readings listed in the manuals of HX1 and MX5X do not match the maximum readings of their reports
ii. An antenna is shown on Pg 10 of the HX1 manual, that seems to be different from the one tested for that model. Please clarify.
iii. MX3X manual mentions an MX3-RFID device with RFID module. Applicant needs to clarify what this model is.
iv. 15.19(a)(3) statements are not as shown in FCC rules. They need to be word-by-word identical to what FCC requires.

4. Issues related to measured conducted power of the device during SAR test;
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The following was provided by Cyril Binnom of LXE, Inc.: "Answer below from Jay Moulton of RF Exposure Lab – (Lab that completed SAR testing)
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5. Please clarify how original test data for module represents LXE antennas. Are the new antennas all dipoles?

All antennas are all omni-directional antennas with lower gain than the antennas used in the original test report.

6. Please clarify with the LXE test lab if they have accreditation from a known agency. Please also provide the FCC listing number of their OATS?

The following was provided by Cyril Binnom of LXE, Inc: "FCC registration # - 90763, Industry Canada – 46405 – 1995"

7. SAR data summary section of the MX7 model implies that it has bluetooth functionality. Please clarify with your client the power level, antenna location and FCC ID of it.

The following was provided by Cyril Binnom of LXE, Inc: "Please note that the bluetooth module in the MX7 Hand Held computer is not available for sale at this time. The product was tested originally tested in two configurations as the report reflects. The submittal for KDZLXE4830P will NOT include a bluetooth module in any of the products. A separate filing will be conducted to add the bluetooth module at a later date."

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