

Please note that the calculation for simultaneous SAR in the SAR report does not appear to be correct. It appears that you have simply taken the highest SAR value and reentered it into the column. For example, the highest measured SAR for GSM850 head is 1.13w/kg. The highest measured WLAN SAR is 0.488w/kg. This would give a simultaneous SAR level of 1.618w/kg. For the scaled SAR values it would be 1.27w/kg + 0.55w/kg or 1.82w/kg. In either of these cases the total summed SAR would be greater than the 1.6w/kg limit. This would indicate that simultaneous SAR test reduction could not be applied. Without further information on how you determined simultaneous SAR, and since the summed SAR values are greater than 1.6w/kg, it appears that this device would require simultaneous SAR evaluation. This would also mean the application would necessarily have to be certified by the FCC. Please explain the summed SAR and justify why this would not require simultaneous SAR evaluation.

It is true that the maximum measured Head SAR value for 2-slot GPRS850 is 1.13W/kg whilst that for WLAN2450 is 0.488W/kg. However, these maxima do not occur for the same test configuration - the former occurring in Left Cheek position, the latter in Right Cheek. In defining the rules for exclusion from Simultaneous Transmission Procedures, even though KDB648474 requires maximum SAR values are added together in the first part - without mentioning any consideration of the test position - it is evident from the second part that the individual test position must be considered since the {max+max} SAR value needs to be divided by the separation distance between the SAR peaks. This second part can only be evaluated if the same test position is involved. As a consequence, it is not appropriate to directly add the 1.13W/kg and 0.488W/kg values together.

The correct SAR value combinations can be found in the 3 "Simultaneous transmissions: Combined SAR results –" tables at the end of Section 7 of the SAR report. The first of these tables lists the maximum measured SAR values in each of the test positions for each individual transmitter, whilst the second table presents {max+max} SAR values for each test position for all of the combined transmission modes. As none of the {max+max} SAR values in this second table has a magnitude > 1.6, we believe that Simultaneous Transmission Procedures as defined by KDB648474 do not apply to this product. A statement to this effect is given in the SAR report in the second paragraph after the third "Simultaneous transmissions: Combined SAR results –" table.