

## Dward ATCB

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Hi Dennis,

Yes, this is appropriate.

Rick

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**From:** Dward ATCB

Hi Rick

On the RF exposure issue; your statement implies that the "fixed installations or control stations (desk top and wall mount versions) and base station test unit applications" will always be site licensed. If this is true then a grant note such as "RF exposure compliance for use of this transmitter in fixed installations or control stations (desk top and wall mount versions) and base station test unit applications is addressed at the time of licensing, as required by the responsible FCC Bureau(s), including antenna co-location requirements of §1.130

**From:** Rick McMurray [mailto:[rmcmurray@rheintech.com](mailto:rmcmurray@rheintech.com)]

**Sent:** 09/19/2007 9:33 AM

**To:** [dward@atcb.com](mailto:dward@atcb.com)

**Cc:** Kathy Grzovic

**Subject:** RE: OWDTR APPS

Dennis,

Here were my thoughts on the test regime for these four applications. It's basically a "re-packaging" of a mobile transmitter, so no RF testing would be applicable. But digital circuitry is being added by way of the AC-DC switching regulator. I thought Part 15 unintentional emissions should at least be investigated for this. Though the

radiated data doesn't technically belong in a licensed report, isn't any transmitter subject to 15.207 if line powered (or is this only for unlicensed TX's?). This may be my misunderstanding.

Though maybe a PC2 isn't applicable for this "re-packaging", Daryl does like to get these changes on record with the commission, and this is a similar approach we've used in past applications with the same "re-packaging" change. From an engineering perspective, it does seem to justify having this on record with the FCC, though I'm not exactly sure what to put in a test report. Maybe no licensed report is necessary – perhaps just a verification report to cover the 15B emissions.

As far as RF exposure, this change makes the mobiles into quasi-base stations (see Daryl's comments from the FCC a year or two ago), so I believe it changes RF exposure to "time of site licensing".

Rick

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**From:** Dward ATCB [mailto:[dward@atcb.com](mailto:dward@atcb.com)]  
**Sent:** Tuesday, September 18, 2007 2:31 PM  
**To:** [kgrzovic@rheintech.com](mailto:kgrzovic@rheintech.com)  
**Subject:** OWDTR APPS

Hi Kathy

What am I missing? Why are you testing a licensed device to part 15B?

Is the rest of the original manual also provided with these units? I ask because there is no rf exposure information in the manual provided.

Is this still in a controlled environment and can the separation distance listed be maintained in the control station environment?

The original grant had 85cm and 57cm separation distances in the grant notes but the FCC in their PC listed only 54cm and put all but 1 emissions designator under 90.210. I will use the FCCs PC as the grant notes with the addition of the control station etc.

Thanks

Dennis Ward  
Director of Engineering  
American TCB  
Certification Resource for the Wireless Industry [www.atcb.com](http://www.atcb.com)  
703-847-4700 fax 703-847-6888  
direct - 703-880-4841  
209-769-8316

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