

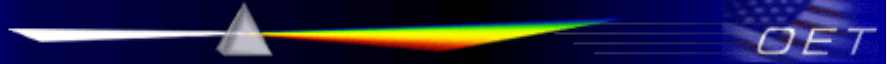
## Philip Littlewood

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**Von:** oetech@fccsun27w.fcc.gov  
**Gesendet:** 23 May 2008 17:04  
**An:** p.littlewood@emcc.de  
**Betreff:** Response to Inquiry to FCC (Tracking Number 190829)



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### Office of Engineering and Technology

#### Inquiry:

From: Philip Littlewood [mailto:p.littlewood@emcc.de]  
Sent: Wednesday, May 14, 2008 9:56 AM  
To: FCC Lab Staff  
Cc: Rashmi Doshi; Joe Dichoso; Chris Harvey; Klaus Knoerig  
Subject: RF exposure evaluation for held-to-face portable PTT VHF devices  
Importance: High

Dear FCC Staff,

With reference to my question about SAR measurement procedures at frequencies below 300 MHz, which was raised yesterday during our TCB conference call, I note that there is a further issue which should be addressed as a matter of urgency.

The current document 447498 D01 Mobile Portable RF exposure v0201 contains an exemption from evaluation for held-to-face portable PTT VHF devices with output power of less than 7 Watts under item 1 (d).

The above exemption appears to have been omitted from the document 447498 D01 Mobile Portable RF exposure v0301, item 5(b) due to the frequency range defined in the title of Table 1 of the same item. With additional reference to the current TCB exclusion list v11, item 2(b) the effect of this omission is that a TCB will no longer be allowed to certify such devices with output power of more than 0.25/1.25 Watts after 15 May, 2008.

Please explain why it was deemed necessary to omit the previous exemption.

Regards,  
Philip Littlewood

#### Response:

Equipment authorization applications and testing after 2008 April 15 were requested to use latest KDB 447498 procedures; however in transition period to 2008 may 15 preceding 447498 (Dec. '07) can be used.

Your pending filing for a VHF PTT device may use preceding KDB 447498 if exhibits indicate radio testing was completed or in process before 2008 may 15

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26.05.2008