

**Inquiry:**

I am reviewing a grant filing for a Part 15 device and require some guidance from the FCC lab engineers. I have searched the Knowledge Database and have gotten some general guidance but need some more specific help. The device is a DSS (Frequency Hopping SS) keypad that mounts on a wall as part of a home security system. Peak RF EIRP is measured to be 178 mW (89 mW cond. w/ a 3dBi antenna) Frequency range is 2.401 - 2.482 GHz. The MPE shows the max. power density to be 0.035 mW/cm<sup>2</sup> at a distance of 20 cm. The manufacturer has warnings in the User Guide advising that the user maintain a minimum 20 cm. separation distance between the keypad and the user's body. I asked that the applicant provide a rationale for classification of the device as Mobile since the device is a keypad. They supplied me with the attached document. Although the device is fixed to the wall, it is obvious that the user would routinely touch the keypad. Does this necessarily mean that the device is categorized as Portable and requires SAR? According to the guidance given in FCC document Mobile and Portable Device RF Exposure Equipment Authorization Procedures - March 18, 2004 it would appear that, if the device is categorized as Portable, it would require SAR evaluation. Is there any allowance for the fact that this device is fixed to the wall and, while the keypad would be touched by the hand, a 20 cm. separation distance can be reasonably maintained between the device and the mass of the body?

**Response:**

Answer: Technically as you state this device could be considered portable, but it has been FCC practice to consider this type of device mobile or fixed since hand contact is very intermittent. In neither case is SAR required since compliance with hand exposure limits is generally not considered a problem.

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