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Telecommunication Certification Body  
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**Subject: - FCC ID: XCRLBPFK-140US**

**SAR Adjustment Based On FCC OET Bulletin 65 Source Based Time Based Averaging Method**

We confirm that our PocketFinder device is an assisted GPS positioning device that reports its position to our servers via GPRS on a regular time base. The total amount of reported data is less than 100 characters since we report only longitude, latitude, altitude, speed and battery level information. Before commencing a fix calculation the device has to download GPS assistance data which is done every 1 hour.

The PocketFinder device reports its position to our servers at selected time intervals, the minimum time interval between position reporting is 1 minute, and this is restricted by software coding in our web based servers to ensure the PocketFinder can not be interrogated more than once within the minimum 1 minute time interval.

The time intervals are configured and managed from our servers by sending timing configuration messages to the device using SMS or GPRS, timing configuration messages are bespoke and can only be created & delivered from our servers

The end user subscriber has no ability to directly control the timing interval configuration of the device, the timing intervals will only ever be configured and managed directly from our servers.

Once the PocketFinder device has received a timing configuration message it will keep time against its internal clock and report fixes at the appropriate time intervals until the device battery is flat, the timing instruction is retained in the device memory and following re charging of the battery the device will re commence position reporting against the previously configured timing interval, we also have the ability to send a power off message to the device from our servers, in this event the device will power off and it will then need to be connected to its battery charger before it will turn on again.

**Device working Scenario:**

GPS assistance data of the size 2Kbytes is downloaded every 1 hour for the data server taking up to approximately 4 minutes (**receive mode**)

The device then returns to idle state during this time & the fix calculation begins (**idle**)

On the completion of the fix calculation a GPRS connection is established and the current device location is reported. This process takes approximately 7 seconds (**transmit mode**)

The device then returns to idle state and remains in this state until the next position reporting is due which is in 1 minutes (**idle mode**)

**Calculations for reduction factor:**

Transmit time (T) = 7 seconds

Idle time (R) = 1 min \* 60 seconds = 60 seconds

Reduction Factor =  $T / (T+R) = 7 / 67$

Therefore effective SAR value =  $(7 / 67) \times \text{SAR value measured}$

Yours sincerely



Joseph Scalisi

President

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