



Global Product Certification  
EMC-EMF Safety Approvals

**EMC Technologies Pty Ltd**

ABN 82 057 105 549  
176 Harrick Road,  
Keilor Park, VIC 3042 Australia

Ph: + 613 9365 1000  
Fax: + 613 9331 7455  
Email: sales@emctech.com.au

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**To:** Federal Communications Commission

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**Attention:** Certification Officer      **Date:** August 9, 2017

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**EMC Ref:** M161205

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**Subject:** FCC ID: XP9CIOF1701 (Additional information request)  
TIMCO Job No# 1344AC17

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Company: Beam Communications Pty Ltd  
FCC ID: XP9CIOF1701  
EUT: Thuraya WE

**1. Label Sample & Location: Please submit exhibit**

FCC ID listed on the label doesn't match what is listed on Form 731-item 4, please revise.  
**EMCT:** Corrected – Please refer to revised label exhibit.

The FCC specifies the format for disclosing the FCC ID of certified modules on the host device's label (See [KDB Publication 784748 D01](#)). Please revise as needed.

**EMCT:** Label revised to meet correct format. Please refer to revised label exhibit.

We note an RF safety decal, indicating the minimum separation distance to be maintained is 0.70-meters. However, this is not supported by the RF Exposure report provided. Please explain or revise.

**EMCT:** RF Exposure report and User Manual revised to clarify and support RF Safety decal indicated on EUT label.

Refer to revised User Manual exhibit (pg 5) and Report Number M161205-6R2\_FCC2-1091\_CIOF1701.

Please note that client has requested to keep separation distance of 70cm on EUT label as it exceeds the level for both FCC and European RF exposure requirements.

We note the inclusion in this application of a Declaration of Conformity for authorization under Part 15B. However, per [FCC Rule 2.1077\(a\)\(3\)](#), the responsible party making the declaration must be a party within the United States. Since this applicant is not, who will be the responsible party for this DoC?

**EMCT:** This application does not include a Declaration of Conformity for authorization under Part 15B. The applicable unintentional radiator compliance was via FCC Part 15B Verification.

The FCC logo has been removed from the label – Please refer to revised label exhibit.

**2. Internal Photos:**

There are two shielded areas on the first photograph on the last page. Neither of these devices appear to be the certified modules. Please remove metal shields from these areas, or explain why they can remain. We must be able to view these shielded components.

**EMCT:** Please refer to revised exhibit – CIOF1701\_Int Photos

### **3. RF Exposure Report**

- a. The declared minimum separation shown in the report (page 4) shows 70-cm, but the User Guide now indicates 0.57-cm. Please revise.

[EMCT: Report revised. Refer to Report Number M161205-6R2\\_FCC2-1091\\_CIOF1701 \(pg 4\) has been revised to show a 57 cm separation distance.](#)

- b. MPE levels appear to still be calculated throughout the report to the 70-cm separation distance, but 57-cm has been established as the minimum spacing. Please resolve.

[EMCT: MPE levels revised and calculated to 57 cm distance.](#)

[Refer to Report Number M161205-6R2\\_FCC2-1091\\_CIOF1701.](#)

Please note that client has requested to keep separation distance of 70cm on EUT label as it exceeds the separation distance requirement for both FCC and European RF exposure requirements.

### **4. Form 731:**

The Frequency Tolerance and Emissions Designator(s) are to be specified for Licensed services on this form. Please revise.

[EMCT: Please refer to revised Form 731, item 14.](#)