Federal Communications Commission

Office of Engineering and Technology

Reply to an OET Inquiry Response

Currently Displaying Inquiry Tracking Number: 793011

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Inquiry Details on 09/25/2014:

First category: RF Exposure *
Second category: SAR (RF Exposure)
Third category:
Subject: SAR test procedure for special using device
Inquiry: Hello,

I have a question about SAR measurement procedure

The product is a healthy product which can detect falling for elders. It is a cell phone also. This product is no headphones and other auxiliary equipment, except charger.

When the Fall Warner detects falling down, the Fall Warner will send a warning message automatically to the binding phone every minute. Everyone can directly call the Fall Warner

GSM part is working in double band 800 MHz/1900MHz, and GPRS Class 10. Modulation type is GMSK. The maximum conducted peak power level is as below. The max peak antenna gain is 0dBi
Band
Channel
Frequency
Conducted Output Power(dBm)
GSM
GPRS 10
Peak
Average
Peak
Average
GSM850

128
824.2
33.80
33.60
31.50
31.40
189
836.4
33.10
32.80
31.10
31.00
251
848.8
32.80
32.50
30.80
30.70
GSM1900
512
1850.2
30.00
29.80

29.00
29.80
661
1880.0
30.50
30.20
29.20
29.90
810
1909.8
30.50
30.20
29.40
30.10

It supports GPS function. The GPS is off in default, and it will switch on while there are some falling actions or it's inquired. Binding phone sends "KGPS" message to the Fall Warner to turn on GPS.

The attachments are photos of product, user manual, User's guide and wearing way.
Please kindly review and give some guide for SAR test location:

1. We could only test body SAR with the back of the device touching the flat phantom for both GPRS and GSM voice operation (as applicable).at the back of the product?

2. Whether to need to test for "front of face" configuration?

---Reply from Customer on 09/25/2014---

The attachment is conducted power.

FCC Response on 09/25/2014:

The instruction manual indicates that this EUT has a speakerphone and a microphone, as well as a belt clip allowing for on-body usage. Devices such as this require testing in accordance with KDB Publication 447498 4.2.2(3) and 4.2.1. As such, in front of face testing and on body testing must be considered.

Please also be aware that devices supporting a slot based mode of communication (i.e. TDMA), considerations as prescribed under 47 CFR 2.1093(d)(5) may be applicable. Such consideration, combined with the guidance provided in Section 4.2, may then be applied to the general test reduction and simultaneous transmission test reduction methods presented in KDB Publication 447498 sections 4.3. Please be aware that, should any test reduction apply, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion.

---Reply from Customer on 09/25/2014---

Dear,
Thanks for you response.
We test in front of face SAR and body SAR at the back of the device. I want to know body SAR at front of device whether or not need to test.

FCC Response on 09/26/2014:

Based upon the information provided, it appears that the antenna is mounted on the front face of the EUT. Per KDB Publication 447498 D01, devices that are designed to operate on the body of users without requiring additional body-worn accessories, must be tested for SAR compliance using a conservative minimum test separation distance <= 5mm. Due to this device's small size allowing it to be worn facing in and out, and with the antenna closest to the external face, consideration of exposure from the front face is prescribed for the associated operating conditions.

---Reply from Customer on 09/28/2014---

---Reply from Customer on 09/28/2014---

---Reply from Customer on 09/28/2014---

---Reply from Customer on 09/28/2014---

Dear,

Sorry, I'm not sure whether you can see the following reply, because I can't see anything.
For the front face of the EUT, we can tested SAR at minimum test separation distance = 5mm rather than 0mm. The test distance is acceptable?

---Reply from Customer on 09/28/2014---

Dear,

Sorry, I'm not sure whether you can see the following reply, because I can't see anything
For the front face of the EUT, we can tested SAR at minimum test separation distance = 5mm rather than 0mm. The test distance is acceptable?

FCC Response on 09/30/2014:

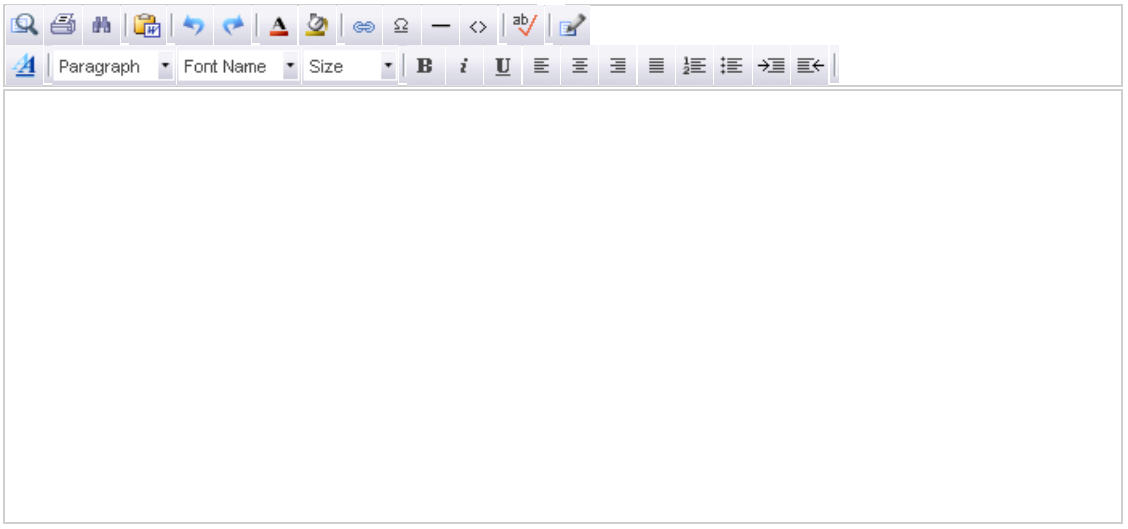
Per KDB Publication 447498 D01, devices that are designed to operate on the body of users without requiring additional body-worn accessories, must be tested for SAR compliance using a conservative minimum test separation distance <= 5mm. 5mm is consistent with this guidance.

Attachment List:

Conduted power
Photos of product
Photos of product
Photos of product
User Manual
User guide

Enter any additional comments below:

*(This is a text only field. Users will be able to upload attachments after clicking on the "Proceed" button below)



Proceed Clear

Please use the Submit Inquiry link at www.fcc.gov/labhelp to send any comments or suggestions for this site

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