William Graff

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Sent: Wednesday, May 25, 2005 2:02 AM

To: whgraff@atcb.com

Subject: Response to Inquiry to FCC (Tracking Number 793338)

Inquiry:
Gentlemen, I am here in Taipei with a non-standard phone presented to me for SAR review. This is not your traditional candy bar phone as shown in P1528. The best way to conceptualize this is to consider a perfect square 8x8cm on a side. The for-real E-M line of this device runs on a diagonal from the earpiece in upper right corner to the microphone in the lower left. This is obviously contrary to P1528"s nice, neat, symetrical bisection of a phone. Is it okay to deviate from P1528"s procedeure and align everything across the for-real E-M line?

Response:

Response: For phones with non-conventional shapes, the IEEE SCC-34/SC-2 committee which drafted P1528 allowed or considered alternative alignment procedures. When alternative phone alignment is applicable for SAR evaluation, the intent is to test according to normal use configurations. Determining normal usage configurations or positions may require judgmental interpretation. For this reason, until procedures to determine normal use configurations are provided, TCBs should query the FCC during their review for a determination or confirmation of necessary test positions for devices with unconventional shapes. The TCB should assure that all determined test positions are evaluated. For a particularly unusual device shape, the FCC reserves the right to require the filing for Certification to be submitted to the FCC.

Thank you for inquiring in accordance with TCB procedures. To assure that your proposal establishes a conservative measurement for this nonstandard device we request you have the test lab use multiple reference lines similar to that included in the described May 2003 TCB training. Reference angles of 0, and +- 15 degrees around your proposed reference line is sufficient. If the number of other variables such as bands, modulation types, or antenna positions is large than test/review at 0 degrees for all configurations (including touch and tilt) and than at +-15 degrees for the worst case configuration of each air interface. Please apply this guidance only for this particular case.

Do not reply to this message. Please select the Reply to an Inquiry Response link from the OET Inquiry System to add any additional information pertaining to this inquiry.