



M. Flom Associates, Inc. - Global Compliance Center

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Date: October 15, 2004

TIMCO Engineering (TCB)
Via: Electronic Filing

Applicant: Rexon Technology Corporation
Equipment: RHP-520
FCC ID: I7ORHP-520
FCC Rules: 87

Gentlemen:

On behalf of the Applicant we apply for exemption from Routine SAR Evaluation based on the Low Threshold as defined in the TCB exclusion list of July 17, 2002.

The unit is a portable radio operating with a transmitter in the 118MHz to 137MHz frequency band with a power output of 5W (PEP). The device is normally used next to face (TNF) but can be worn on the belt during operation and therefore could be less than 2.5cm from the body. The usage of the radio qualifies it as Occupational for SAR calculations, with a 50% duty cycle for PTT operation.

The Low Threshold is;

Mid band frequency = 127 MHz = 0.127 GHz
= (375 / 0.127) mW
= 2.953 mW x 50%
= 5.906 mW
= 5.9 W

No SAR report is required or provided.

Sincerely yours,

David E. Lee,
Compliance Test Manager