

RE: Georgia-Pacific Consumer Products LP
FCC ID: 2AALY-528GP
IC: 21620-528GP
ATCB019636
Date: 7/29/16

1. Our understanding of the intent of this application, based on conversations with Tim Johnson, is as follows: the EUT is comprised of two previously authorized modular transmitters as identified in the Theory of Operation, a WiFi transmitter and a BT/BLE transmitter. The WiFi transmitter is being re-tested due to changes in the antenna lay-out, with the new data demonstrating compliance included in the DTS EMC report #315364 uploaded with this application. Since the BT transmitter remains identical, in its entirety, to the device that received the original modular approval, the test data from the BT's original modular application is being re-used in this application, as it remains applicable to the BT transmitter in this new configuration. If this understanding is correct, please provide a cover letter clearly explaining these things. If it is not, then please clarify the intended scope of this application.

Response: An additional letter has been submitted explaining the intent of the application as well as the re-use of test data.

2. Regarding the re-use of test data, please note that, because the BT/BLE transmitter was previously approved as a module, KDB996369)D02)Question 1)Item 2) appears to be applicable in this case:
"For the new filing, it is permissible to upload relevant test reports from an original module filing, if they accurately represent test results under the new conditions described in the new application(s). When original results are used, the new applicant must provide a statement and explanations that the original test reports accurately represent test results under the new conditions. For each original test report, this statement must list the associated FCC ID, specific test report identifiers, and a description explaining how the report accurately represents test results under the new conditions. All exhibits for uploaded original test reports must represent the new device in its entirety. In this case, the module must be identical, and in the same configuration, in order for the original tests to apply. Thus, the original test report exhibit must, in its entirety, be the same as the test report contained in the original filing. A reference to only a section of an original test report, or uploading only a portion of an original test report, is not permitted. However, certain test data may be re-used if properly justified. For instance, conducted signal tests may be re-used if the power is verified to be the same. Any changes to hardware, hosts or co-location configuration require new radiated emission and SAR evaluation and/or testing."
If our understanding of the intent of this application is correct, then a copy of the original EMC report for the BT transmitter (from its modular approval application), along with the statement and explanations described in the referenced KDB Publication must be submitted.

Response: Bluetooth Low Energy radiated transmitter spurious emission data has been included in the test report as Exhibit 13.

3. The RfX exhibit includes calculations demonstrating compliance for both transmitters with FCC and ISED requirements for both portable and mobile exposure conditions, but does not clearly explain the intent of the exhibit (typically, classification as a portable device makes additional classification as a mobile device redundant). Please note that Section 2.1091(d)(4) of the FCC Rules appears to indicate that only a single exposure condition (portable or mobile) should be applied in a single application: “In some cases, e.g., **modular** or desktop transmitters, the potential conditions of use of a device may not allow easy classification of that device as either mobile or portable (also see §2.1093). In such cases, applicants are responsible for determining minimum distances for compliance for the intended use and installation of the device based on evaluation of **either** specific absorption rate (SAR), field strength **or** power density, **whichever is most appropriate.**” {emphasis added} If you desire to keep both the portable (i.e., SAR Exclusion) and the mobile (i.e., MPE Estimation) calculations in the exhibit, then please add, near the beginning of the report (e.g., new section “1.4”), a summary of the calculations presented therein, clearly explaining that the EUT primarily meets the FCC and ISED SAR Exclusion thresholds for portable operation, however, additional calculations have been included that also demonstrate the EUT’s compliance with FCC and ISED MPE limits for mobile operation.

Response: Section 1.4 has been added with a statement explaining the calculations included within the report.

4. The EMC report does not appear to include either the FCC ID or the IC ID – both of these should be listed in the report – please address.

Response: FCC/IC ID numbers have been added to section 2.4 of the report

5. The last sentence on p.6 of the RfX exhibit states, “0.8 W/kg > 1.6 W/kg” – please revise.

Response: This has been corrected.