

FCC ID: ALH430900
IC ID: 282D-430900
CT Project: p13c0002

From: Chris Harvey
Date: 3/17/14

1. Please explain why the original Grant did not list SAR values and why no SAR report was uploaded in original TCB filing from February 2011? The Original IC REL listing does include SAR.

CT – Original FCC filing had SAR exclusion for frequency below 300MHz per KDB628591, and filed under PBA 823688 and therefore did not require SAR test report.

2. Please explain why the original SAR data (from IC REL listing) of 2.24W/kg (vicinity of head) and 3.93 W/kg (body-Worn accessories) is so much higher than the SAR data from this C2PC report (0.42 & 1.31 W/kg, respectively).

CT -The difference could just be due to the different antenna. The new antenna may not have as high of currents in the near field as the original antenna.

3. The RF report for this TCB and IC application is a single Part 90 report that does not distinguish FCC operations from Canadian operations (different frequency ranges) and just lists FCC Part 90. It would be best to have separate FCC Part 90 RF Test Report showing only FCC operating frequencies, and a separate IC RF Test Report showing Canadian operating frequencies and RSS-119 requirements.

CT – IC only frequencies have been distinguished in the Test Report

4. The RF report does not indicate why the radiated test is being performed in this C2PC, and indicates that no accessories were used or which of the batteries and/or antennas which are part of this C2PC have been included and/or tested.

CT – The Class 2 Permissive Change cover letter explains the accessories changed. Since the antenna addition is the only change that would affect the RF emissions, Radiated measurements were taken.

5. The FCC SAR Report contains data for the IC only frequencies, which also seem to be where the Maximum SAR values are located. It would seem appropriate to distinguish the IC Only data from the FCC/IC data and indicate the Maximum SAR for FCC operation (150-174MHz) in the FCC SAR report.

CT – Please see updated SAR reports.

Response by: Compliance Testing LLC

Submitted by: Compliance Testing LLC

Date: 3/28/14