

From: Roland Gubisch ITS/ES-Box
Sent: Friday, April 11, 2003 5:53 PM
To: Sandy Lee ITS/ES-HKG
Cc: Joyce Chan ITS/ES-HKG; Danielle Gravelle ITS/ES-Box; Wilson Loke ITS/ES-HKG
Subject: RE: RadioShack FCC ID: AAO2101902
Sandy:

The RF output power of this device requires SAR (RF exposure) measurements - which are not provided - to be certified. We note that this radio has a belt clip and may be operated clipped to the belt, using the accessory microphone and earphone. Thus it must meet **body-worn** SAR limits. The TCB limitation on output power **without** SAR data is as follows:

(1) for portable devices held < 2.5 cm from the body (belt clip position), limit = (60/f, GHz) mW for continuous duty, (120/f, GHz) mW for push-to-talk

(2) for portable devices held \geq 2.5 cm from the body (face-held position), limit = (120/f, GHz) mW for continuous duty, (240/f, GHz) mW for push-to-talk

The center frequency of this device is 0.4626375 GHz, so the upper limit of power is 259 mW average for **body-worn** applications. This exceeds the measured RF power in both FRS and GMRS modes.

If SAR data is provided, we can certify push-to-talk devices in this frequency band up to 3.9W. Please note that the FCC would also require SAR data if the application were submitted directly, owing to the body-worn configuration.

Regards,
Roland

-----Original Message-----

From: Roland Gubisch ITS/ES-Box
Sent: Friday, April 11, 2003 4:01 PM
To: Sandy Lee ITS/ES-HKG
Cc: Joyce Chan ITS/ES-HKG; Danielle Gravelle ITS/ES-Box
Subject: RadioShack FCC ID: AAO2101902

Dear Sandy:

Thank you for this application. Technical review has been started. We note the following issue with respect to the User Manual:

The requirement for the user to obtain an FCC license prior to using the GMRS frequencies is not prominent in the manual, nor does there appear to be an **informational insert** (see below) which cautions the user to obtain a license.

The Grant of Authorization for this device will contain the following wording:

This device is authorized to operate in the following radio services: FRS (Part 95B) or GMRS (Part 95A). There must be an informational insert inside the box (product package) that clearly informs the consumer (buyer/owner) when the radio is transmitting on GMRS frequencies, that operation on GMRS frequencies require an FCC license and such operation is subject to additional rules specified in 47 C.F.R. Part 95.

Sample text for an informational insert, as required in the Grant, can follow this example

(below) from an FCC-certified GMRS/FRS radio. The insert is printed as a separate card, on bright colored stock:

"This [manufacturer's name] radio operates on General Mobile Radio Service (GMRS) frequencies and is subject to the Rules of the Federal Communications Commission (FCC). The FCC requires the issuance of a radio license before operating on GMRS frequencies.

"Instructions on applying for the license are included in the User Manual. For more GMRS information, see <http://www.fcc.gov/wtb/prs/genmbl.html>.

"Violations of FCC rules and unlicensed operation on GMRS frequencies may subject the radio operator to serious penalties as provided in Sections 501 and 502 of the Communications Act, as amended.

"When operating on channels 1 - 7 or 15 - 22, this radio is using GMRS frequencies. In addition to having a license before using these channels, every GMRS user must cooperate in sharing channels with other GMRS users by monitoring the channel before initiating transmissions, waiting until communications in progress are completed before initiating transmissions except in an emergency, engaging in only permissible communications, limiting transmissions to the minimum practical transmission time, and using the call sign issued by the FCC for station identification."

The wording suggested above does not have to be followed exactly. However, a separate insert is required

Other suitable notices (recommended, not required) regarding the GMRS capability of the GMRS/FRS radio can appear on the outside of the User Manual, as: **"FCC GMRS License required"**

Please provide an exhibit which complies with the requirement for an informational insert. Technical review will be completed shortly.

Regards,
Roland