

Marianne Bosley

From: Greg Czumak
Sent: Friday, September 07, 2001 11:31 AM
To: Marianne Bosley; Chris Harvey
Subject: RE: Telular (7Layers) FCC ID:MTF00701 MET#11225
Chris,

This is a mobile Part 24E device, with which they have provided an SAR report. Does the FCC have to approve this? Listed EIRP is 1.54 W, though they provide no justification (i.e., test data) to support this statement. I am not qualified to review an SAR report. Re RF requirements, there are a number of problems and omissions, which I will list below.

Gregory

1. A video filter (i.e., $VBW < RBW$) was used to demonstrate bandedge compliance. FCC policy has always required that constant envelope modulation schemes (such as GMSK, as used by GSM devices like the EUT) must use peak detection (i.e., $RBW > VBW$). This applies both to spurious emissions tests and output power tests. Both of these must be remeasured using a $RBW > VBW$, and new data submitted.
2. FCC policy requires that standard frequency stability tests, in which carrier drift is measured, per Section 2.1055, be performed on Part 24E devices that employ a carrier. Please submit this data.
3. Please provide raw data, sample calculations, and test procedures used to measure output power, EIRP, and spurious radiated emissions. Simply providing summary sheets indicating final levels is not sufficient.
4. Please provide occupied bandwidth plots.
5. Please propose an emission designator, and justify the proposed choice.
6. As a mobile device, as far as RF Exposure is concerned, the FCC generally requires that a statement be included in the installation instructions of the User's Manual specifying a minimum separation distance of 20 cm between the antenna and all persons during normal operation, in order to comply with FCC RF Exposure limits.

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

From: Marianne Bosley
To: Greg Czumak
Sent: 9/5/2001 1:08 PM
Subject: Telular (7Layers) FCC ID:MTF00701 MET#11225

Another new one, I've requesting new photos (they are within the test report).

<<Pages from Telular SX4e GSM-1900 RF Document.pdf>> <<FCC part 15_24 test report.pdf>> <<SAR test report.pdf>> <<Telular SX4e GSM-1900 User Manual.pdf>> <<Telular SX4e GSM-1900 FCC Part 24 Submission.pdf>>

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