

Federal Communications Commission
Authorization and Evaluation Division
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Columbia, Maryland 21046

Kwok Chan / Errol Chang:

Please find attached our reply to your correspondence concerning LJPNSB-6NY (EA96734, correspondence reference number 13918). The original text is followed by our highlighted response.

Regards,

Kare Oksanen
Engineering Manager, Type Approval

The body-worn and hand configurations tested use conductivity and permittivity parameters for brain tissue. Muscle tissue parameters should be used for body-worn and hand configurations. Retest for body-worn and hand configurations with muscle equivalent parameters and appropriate probe calibration for those parameters OR provide a paragraph showing SAR compliance by explaining the effects of muscle tissue parameters on the current data.

Permittivity and conductivity of muscle tissue simulating liquids at 1850MHz is shown in table 1. FCC recommendation is from <http://www.fcc.gov/fcc-bin/dielec.sh>

	<i>Permittivity</i>	<i>Conductivity</i>
FCC recommendation	54.373249	1.418387
Used brain tissue	41.6	1.72

Table 1. Properties of liquids simulating muscle tissue @1850MHz

The used brain tissue has higher conductivity and lower permittivity than the liquid FCC recommends to be used. Thus all SAR values are overestimated.

The Test Method section in the SAR report states that the _display and keypad were facing the flat phantom_. The correct positioning would be to have the display and keypad facing away from the phantom. Retest the body-worn configuration for the three configurations with the display and keypad facing away from the phantom. Provide the separation distance from the phantom as necessary.

Carrying cases are designed in the way that the bottom connector, in which the headset is plugged-in, is clearly accessible only when the display and keypad are facing the flat phantom. Since having a call while keeping the phone in the carrying case is not possible in another position without misusing this body-worn accessory, retesting with the display and keypad facing away from the phantom would be irrelevant. There is no need for a separation distance when the phone is positioned correctly in the carrying case.

Provide the separation distance used while testing for body-worn data with the _belt clip against the flat phantom_ data.

There are no belt clips in the product concept.

The full capability of the phone for body-worn configuration (ie: phone in a shirt pocket) was only partially tested as shown with the _display against the flat phantom_ data. Additional data with the back side of the phone (without the belt clip) against the phantom will be required to comply with the current version of the manual. As an alternative to additional data, the manual can be revised. If this approach is chosen, the wording _or place the phone in a pocket so that the keypad faces your body_ should be removed from the manual (_Radio frequency (RF) signals_ heading) and a new page uploaded as an exhibit.

New revised page in the user guide is attached in Appendix 1.