

RE: FCC ID: AFJ277602\_ATCB001830

Attention: Tri Luu

I have a few comments on this Application. Please note that further comments may arise in response

to answers provided to the questions below.

1. Please note that page 48 of the SAR report You have "(i.e. 15mm at 835MHz) in the sentence referring to the liquid separation distance to the dipole. The report then states that 13mm at 450MHz was used. Please confirm that the "15mm at 835MHz" mentioned is strictly an example and not actual data used.

"15mm at 835MHz" is an example as a part of our report format template to explain how we perform the system verification in general. On the other hand, 13mm at 450 MHz was specified distance between the dipole and outside of the phantom thus after adding 2mm thickness of the phantom the distance between the dipole and the tissue become 15mm as guided in IEEE 1528 standard.

2. Please note that the manual states that in body worn configurations the transmitter is to be kept at least 2.5cm from the body. However, while you have shown testing in face position at 2.5cm, your SAR report does not show that body SAR was done at 2.5cm. Please provide a SAR report that clearly shows the worse case SAR in body configuration was done at 2.5cm.

In OET65 sup.C, it is explicitly specified to test DUT with 2.5 cm between front face of the DUT and the phantom in face-front held configuration while no such a specification in body-worn configuration.

In body-worn configuration, if manufacturer specify and provide belt-clips, we have been tested the DUT with the belt-clips touching the phantom, otherwise we tested with 10~25 mm distance (no more than 25 mm) which represented for the thickness of a generic belt-clip. It is well known that SAR is subject to the distance and it gets higher as smaller the distance is. We have been filed several applications to FCC in this manner without any problem for last few years.

The 2.5 cm distance in user's manual is just a general recommendation to ensure the DUT is being operated safely.

3. Please note that the accessory use statement in the manual states to use the accessories listed on page 33. However, please note that there is no page 33 of the manual and please note that the list of accessories appears to be on pages 30 and 31 of the manual. Please correct to give accurate location of data in the manual.

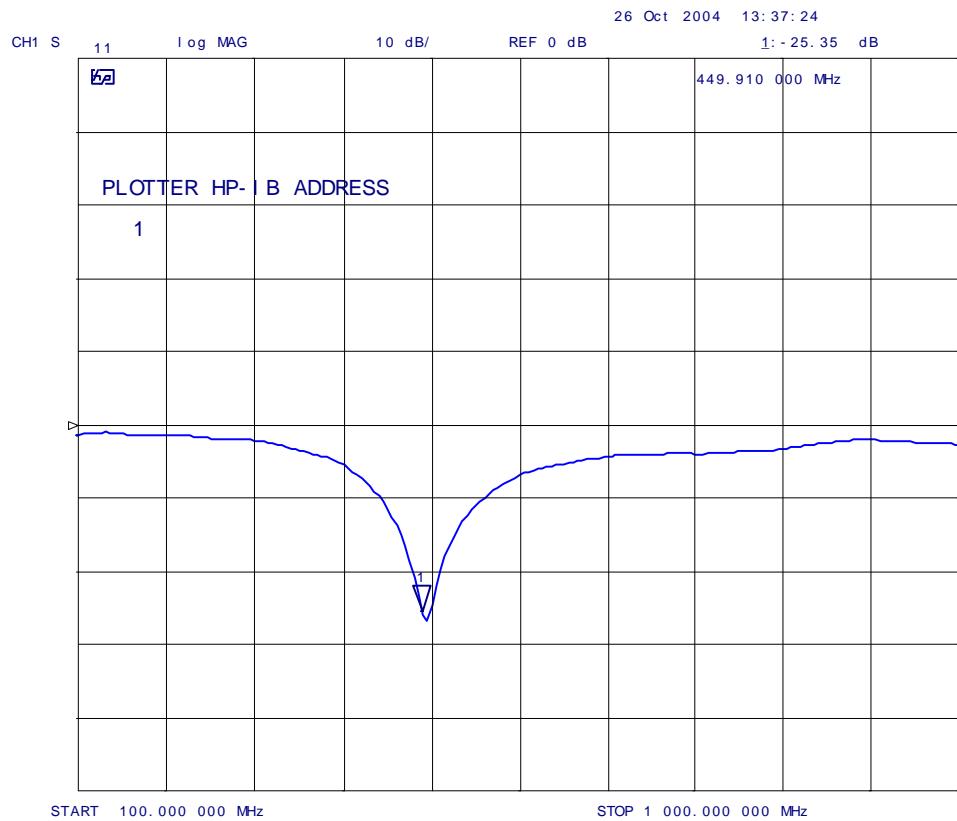
PI find revised user manual attached.

4. Please provide the dipole calibration certificate and data.

The dipole was house made as guided in Annex G in IEEE 1528 and tuned by ourselves.  
The given below is details.

Model Number	UT-RD-450
Serial Number	0001
Length of the Dipole (L)	282.0 mm
Thickness of the Dipole (d)	3.64 mm
Height of the Dipole (h)	167.0 mm





1. HP Hewlett Packard Network Analyzer (Model No.: 8753D, Serial No.: 3410A06430)
2. Test at 15 mm separation distance from tissue.