To: Bruno Clavier, Rhein Tech Laboratories Inc.
From: Andy Leimer aleimer@fcc.gov
FCC Application Processing Branch
Re: FCC ID AXATR-420-A2
Applicant: Ericsson Inc
Correspondence Reference Number: 22017
731 Confirmation Number: EA780492

1) The User's Manual states a 20 cm separation distance.(page 31) "to a normally occupied location."The MPE exhibit says 27 cm. Correct the phrase to "to a normally occupied location or person."Submit the corrected page of the User's manual.
Correction made and revised manual attached

2) The User's Manual has information for cell phones on page 33. This is not a cell phone so remove this and submit a corrected User's manual.
Correction made and revised manual attached

3) The MPE analysis was based on 30 minute averaging. Part 2.1093(d)(2) says that this is not permitted. Please address this issue.

Our analysis is based on a mobile device. For this reason we referenced Part 2.1091(d)(2) for radiation exposure evaluation. Our analysis has two parts, Maximum Exposure and Typical Exposure.
Maximum Exposure Analysis
In our maximum exposure analysis, we provide descriptions of our Class I burst modem and our Class II continuous AMPS mode. For the Class I burst modem, we used the mobile unit's source-based time averaging which as described has a duty cycle of 18.1% over 41.5 seconds total period. This duty cycle is inherent to the device and can not be extended by the user. The Class II AMPS mode is continuous. Therefore, a 1/1 duty cycle was used for this analysis, and a distance from the radiating device to any person of 27cm was specified.
Typical Exposure Analysis
For the typical exposure, we specified our typical hardware configuration, and based our analysis on Table 1B of 47 CFR 1.1310 for maximum permissible exposure limits for general population / uncontrolled exposure. This table uses an averaging time of 30 minutes. However, since the maximum exposure analysis does not apply this factor for the Class I, and the Class II is continuous in both analyses, we could change the typical to exclude the 30 minute averaging factor. Simply perform the same calculations as in the maximum exposure analysis, but with the typical hardware configuration assumed.
We are including a new Exhibit 11 with the calculations performed as mentioned above