David Waitt,
Handspring Inc,
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USA

Mr. Waitt,

I have read your email and I would like to offer these comments in support of your application.

Q. Confirm that the extrapolated separation distance of 6.7 mm used for the body-worn configuration represents that of the carrying case and the belt clip.

Due to the nature of the material used for the Handspring Pouch we carried out a series of separation scans, on the unit tested. The pouch is constructed of material which does not have any metal contained within the construction. The test process adopted by APREL laboratories is to carry out separation scans and then reassess for the peak value, while the unit is contained in the pouch/body worn accsessory. If the peak value falls below the separation calculation for SAR then we assume that a more conservative value has been recorded by stating the separation distance and calculated SAR value.

Q. In future applications do not extrapolate a separation distance for the body-worn configuration. Perform the body-worn SAR test using the actual accessories.

This will become lab practice unless the body worn accessory is not available at the time of testing. Having investigated data from previous projects we have identified that the process detailed above where a separation exercise has been executed, and then the DUT is measured while mounted on the accessory, a normal outcome is a slightly more conservative measured SAR value. This is normal unless a metallic component is used in the construction of the body worn accessory.

Q. You requested that the classification be changed to "Part 24 Equipment Worn on Body." This cannot be done for a Class II Permissive Change application since the classification must match that of the original Grant.

The above question is out with the scope of the project and would be better answered by the filing body.

Q. The tissue parameters showed too much variance over the recommended values. In the future it is recommended that the tissue variance not be greater than 10% over those recommended in the IEEE SCC-34 document.

The IEEE SCC-34 P1528 document is currently only draft and is only available to contributing members of the working committee. APREL laboratories will be working where appropriate with the values indicated in the P1528 standard. Due to the limitations of the phantoms used for testing we are slowly introducing solvents into the lab process for the tissues recipes quoted in P1528. The higher measured value for sigma would only increase the uncertainty budget and provide a more conservative measured SAR for the DUT tested. APREL have now initiated a program of using the target values listed in the liquid recipes other than those noted in OET 65.

I hope that the information listed above will meet the expectations of your organisation and speed up the grant process. If you have any further questions please let me know in the first instance.

In Trust,

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