

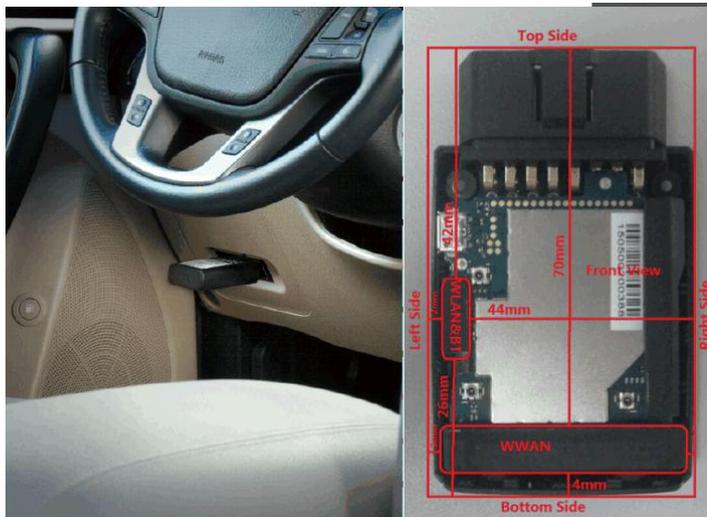
Dear Sir,

As to the FCC Comments 234896 on June/02/2016,

"We are sorry to inform you that this device cannot be classified as MPE since there is no guarantee that the required distance can be maintained for all models of car. Therefore, it is under audit. However, please refer to KDB 447498 D01, section 4.3.1, "Standalone SAR test exclusion considerations" and apply the formula under 4.3.1 (a). The distance to be used in the formula will be 50mm. You must consider all frequencies intended to be used."

We have response as below:

1. In our perspective and the usage, this product seems not be able to defined as portable product, since it need to be powered by vehicle electricity and cannot be transmit when hand carry as below photo described. As you see in the picture, the top side is the interface of electricity.



2. As to considering the risk that end user may close to this device, here is a curiosity about why home wireless AP router (w/o battery) did not need to test SAR since it has external monopole and user has big chance to be close it?
3. In order to evaluate the RF Exposure to clarify dispute, KDB 447498 formula was leveraged with distance 50mm to evaluate the SAR test threshold. The calculated results shows positive to SAR test. Thus, a pre-test of BODY SAR was made and test distance of 10mm was proposed.

4. Please advise if the test with distance 10mm is acceptable or not. Then full test will going on under your approval.

Band	Mode	Test Position	Separation Distance (cm)	Channel	RB	offset	SAR 1g	SAR 10g
LTE 2	QPSK20M	Bottom Side	1	18700	1	0	1.05	0.577
LTE 4	QPSK20M	Bottom Side	1	20050	1	0	0.832	0.447
LTE 5	QPSK10M	Front Face	1	20450	1	0	0.246	0.162
LTE 5	QPSK10M	Bottom Side	1	20450	1	0	0.09	0.06

Sincerely,

William Chung

Technical Manager
 Mobile Certification
 Bureau Veritas CPS E&E Business Line