



**By Electronic Delivery**

June 30, 2012

Attn: Dr. Rashmi Doshi  
Chief, Laboratory Division  
Office of Engineering and Technology  
Federal Communications Commission  
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[tiaonline.org](http://tiaonline.org)

**Re: *Comments of the Telecommunications Industry Association on  
Draft Knowledge Database Publication 388624***

Dear Dr. Doshi:

The Telecommunications Industry Association (“TIA”) hereby submits input to the Federal Communications Commission’s (“FCC”) Office of Engineering and Technology (“OET”) on draft Laboratory Division Knowledge Database (“KDB”) publication 388624 (“KDB 388624”). Specifically, TIA submits the following input for OET’s consideration:

- Because there has been several versions of KDB 388624 on software defined radios (“SDRs”) and the Telecommunications Certification Bodies (“TCBs”) have had ample time to understand the related guidance in these KDBs, SDRs should be removed from the Permit But Ask (“PBA”) process.
- For modules and peripherals we do not see the rational for requiring a PBA if the SAR level is >1.2. As indicated above we don’t see the benefit of asking for a PBA unless the test conditions require a deviation from the existing test procedures.

TIA has previously requested an extension of the due date for comments on draft KDBs as critical to industry’s ability to provide thoughtful comments. In order to facilitate review of industry’s concerns, TIA may submit comments to selected KDBs, subject to supplementation, after June 30, 2012.

We therefore respectfully submit this comment to draft KDB 388624, and urge the Commission to adopt policies consistent with the above.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Danielle Coffey

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