



By Electronic Delivery

June 30, 2012

Attn: Dr. Rashmi Doshi
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Rd.
Columbia, MD 21046

**TELECOMMUNICATIONS
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**Re: *Comments of the Telecommunications Industry Association on
Draft Knowledge Database Publication 616217***

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 616217 (“KDB 616217”). Specifically, TIA submits the following input for OET’s consideration:

- Additional clarification is required on antenna testing/selection (specific absorption rate [“SAR”]) for modules designed for integration into laptops. The language in section III (e.g. page 3) does not clearly define the antenna parameters of interest to the FCC. The section discusses requirements for the retesting of antennas based on conductive/non-conductive surrounding materials but does not define allowable deviations in the antenna parameters. These restrictions on antenna selection drive the number of Class II permissive change requirements. For example, is a PIFA antenna limited to physical dimensions, efficiency characteristics, return loss, etc.? In the absence of definition, it is unclear if the FCC is allowing the manufacturer to determine what characteristic are of importance (e.g. increasing or limiting Class II changes at engineering discretion) or if the FCC would like feedback from industry on what, if any,

antenna characteristics should be restricted with respect to “modular” or host SAR.

Given the potential impact of the proposed KDBs on test time, lab capacity, and even product design, we request that OET determine and announce a reasonable transition period for implementation of the KDBs once finalized. TIA members recommend that a transition period of at least ninety days in order to mitigate the impact that such extensive changes to testing protocols will have.

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 616217, and urge the Commission to act consistent with the above.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Danielle Coffey

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