



**TELECOMMUNICATIONS
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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

**Re: *Comments of the Telecommunications Industry Association on
Draft Knowledge Database Publication 628591***

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 628591 (What equipment cannot be certified by a Telecommunications Certification Body?) (“KDB 628591”). Specifically, TIA submits the following input for OET’s consideration:

- In Section 2(d) (page 3), TIA believes that clarification is needed regarding intent of use. KDB 628591 states that “[p]ortable transmitters operating in general population exposure conditions with source-based, time-averaged maximum output power and separation distance requirements exceeding 12 times the SAR Exclusion Threshold in KDB 447498.”

Please clarify which spacing/modes need to be considered when evaluating this exclusion. For example, a device may be evaluated for voice modes at the body at, say, 15-mm, but in Mobile Hotspot mode at 10-mm. Based on the data in Appendix A of DKDB 447498 (referenced by this KDB), it appears that many current cellular phone devices would be excluded from TCB consideration based on standard air interfaces, output power, and test

spacings.

For example, a typical 850 MHz GSM device could easily rate at 500 mW or higher (source-based time averaged, based on only two up-slots). Such a device would exceed the exclusion threshold by at least 15-times, based on a 1-cm spacing.

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 628591, and urge the Commission to act consistent with the above.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Danielle Coffey

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