



**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 648474***

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 648474 (What are the test procedures for Specific Absorption Rate [“SAR”] evaluation for handsets that contain multiple transmitters and antennas or wireless charging battery covers?) (“KDB 648474”). Specifically, TIA submits the following input for OET’s consideration:

- In Section G (page 6), Specific Anthropomorphic Mannequin (“SAM”) limitations are provided. TIA believes that, with respect to SAR probe access, these limitations should apply to all SAR testing and not just multiple transmitters. Therefore, TIA proposes that this section be relocated to the more general KDB 865664.

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 648474, and urge the Commission to act consistent with the above.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Danielle Coffey

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