



**TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION**

**HEADQUARTERS**

2500 Wilson Boulevard  
Suite 300  
Arlington, VA 22201-3834  
+1.703.907.7700

**D.C. OFFICE**

10 G Street, N.E., Suite  
550 Washington, DC 20002  
+1.202.346.3240 MAIN  
+1.202.346.3241 FAX

[tiaonline.org](http://tiaonline.org)

**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 941225***

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 941225 (What are the current SAR test procedures for 3G devices?) (“KDB 941225”). Specifically, TIA submits the following input for OET’s consideration:

- In KDB 941225, the SAR reduction threshold to 1.2W/kg will drive additional and unnecessary testing of devices. TIA fears that the reduction of this threshold will drive significant additional cost and time into programs without any tangible benefit. For example, LTE SAR values may trigger many extra measurements for many designs crafted for maximum SAR around 1.2mW/g (e.g. tablets).

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 941225, and urge the Commission to act consistent with the above.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Danielle Coffey

Danielle Coffey  
Vice President & General Counsel, Government Affairs

Mark Uncapher  
Director, Regulatory & Government Affairs

Brian Scarpelli  
Manager, Government Affairs

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10 G Street N.E.  
Suite 550  
Washington, D.C. 20002  
(202) 346-3240

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