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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 447498***

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 447498 (“KDB 447498”). Specifically, TIA submits the following input for OET’s consideration:

- TIA hereby expresses concerns about the provisions of KDB 447498 that require phone manufacturers to accept responsibility for products marketed by third party accessory providers. The language regarding third party accessories on page 7, paragraph (2)(i)(b), is overbroad by sweeping in “types of body-worn accessories users may acquire” that are sold outside the control of the phone manufacturer.
- TRPC believes that the intent of the provision is to assure that phone manufacturers provide guidance to consumers sufficient to enable them to know how use the handset with accessories and maintain compliance with FCC’s exposure guidelines. That requirement is already part of paragraph 2(d). Accordingly, paragraph 2(i)(b) is unnecessary and the language appears overbroad. We strongly recommend that it be taken out of the KDB.
- In Section (IV)(B)(2)(i)(d)(i) it is stated that specific information must be provided in the User Manual, including "All unsupported body-worn accessories

and operating configurations (emphasis added) must be clearly disclosed to users through conspicuous instructions in the user guide or manual to ensure such operations are avoided."

No manufacturer could anticipate all possible unintended modes of operation. Any attempt to do so would, by its very nature, not be comprehensive, and would potentially mislead the user by omission. It seems more reasonable to define the intended modes (e.g. minimum spacings for use at the body).

- The test reduction in Section IV(C) should be updated to include the specific absorption rate ("SAR") exclusion for modes where higher power bands have been tested. We urge OET to aim to reduce test cases where lower SAR levels have been demonstrated. OET had indicated that additional review was being proposed for module integrations including RF exposure. We encourage additional discussion before implementing these into official test procedures. A review of the 1.2 level for Permit But Ask ("PBA") approval should be addressed and modified based on unique design characteristics and low SAR value.

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 447498, and urge the Commission to adopt policies consistent with the above.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Danielle Coffey

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