



By Electronic Delivery

October 16, 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 Association¹ (“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, General RF Exposure Policies for Equipment Authorization (“KDB 447498”). Specifically, because the FCC has indicated that it intends to commence a proceeding on radio frequency exposure issues, rather than consider SAR issues in a piecemeal manner, TIA strongly urges the Commission to consider this issue in a complete and robust manner – through the rulemaking process.

¹ TIA is a Washington, DC-based trade association and standard developer that represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA’s approximately 500 member companies’ products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute (ANSI). TIA’s Technical Regulatory Policy Committee (“TRPC”) serves as a common manufacturer partner with the FCC towards the goal of streamlining and clarifying the mechanisms of the FCC equipment certification processes and procedures.

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TIA is aware of comments submitted to OET regarding body spacing in KDB 447498. In response, we note our understanding that the FCC intends to address SAR policies generally in its rulemaking process, and that this process is already underway. We therefore believe that rather than making changes to related SAR policies, OET should address these policies via the rulemaking process in a Notice of Inquiry already in development. Using the KDB process would run parallel to this already-existing effort, and would not holistically approach an important issue where regulatory certainty and is needed across the kinds of devices that must meet FCC SAR body spacing testing requirements.

We therefore respectfully request that OET refrain from addressing changes to SAR-related policies or testing guidance, and instead appropriately avoid duplicative efforts and address these issues in the rulemaking process.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Danielle Coffey

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