KDB 447498 bases the separation distance on enclosure to person, not antenna to person, for devices used close to the body. This revised version of KDB 616217 resolves some potential contradictions in the existing version which suggested that for tablets and notebooks you only need consider the antenna-to-person separation distance. Would it be possible to state a minimum distance from antenna to enclosure (e.g. 5cm or 2.5cm) at which we can base SAR exclusion on the antenna-to-person (i.e. antenna-to-enclosure distance in a tablet or keyboard section of notebook) rather than the enclosure-to-person separation distance? If this clarification belongs in KDB 447498 then it could be used to apply to help determine what would be considered a small device.

Please clarify/confirm in this KDB that to allow use in tablets or the base section (keyboard section) of notebooks/laptops the module **MUST be tested with an antenna-to-phantom separation distance of 5mm or less**. Anything more than 5mm would limit use of the module to the display section of laptops/notebooks unless host-specific testing is performed.

Following discussions with other TCBs, test labs and applicants there is confusion about when module-level SAR testing can be leveraged to allow installation in host systems without requiring additional testing. Although some changes to the KDB 616217 have been made could you please clarify the installation conditions that would not require re-evaluation of SAR in the host for modules installed in tablets and in the keyboard section of notebooks. For example a module is tested with an antenna-to-phantom test separation distance of Xmm (X <= 5mm) and SAR < 0.8 W/Kg. Can this module now be used in:

a) any tablet/notebook;
b) only those tablets/notebooks which have an enclosure-to-person separation distance of >= Xmm
c) only those tablets/notebooks where the separation distance between the antenna and the enclosure surfaces that will be against the body (edges and rear for a tablet, base for a notebook) is >= Xmm.

If the measured SAR at 5mm for the module exceeds 0.8 W/Kg and testing is repeated inside a host platform with antenna-to-enclosure separation of Ymm, can this module now be used in:

a) any similar platform;
b) only those similar platforms which have an enclosure-to-person separation distance of >= Ymm
c) only those similar platforms where the separation distance between the antenna and the enclosure surface to be against the person is >= Ymm.

In both cases above I think option (c) is correct

- option (b) cannot be correct since we assume 0mm separation between tablet / keyboard section and person, so
- if option (a) is correct then why require testing at distances <= 5mm and not just at 5mm (i.e. why would anyone test at a distance < 5mm).

For antennas installed in the display section I think the KDB is clear that provided measured SAR < 0.8 W/Kg the antennas can be installed in the display section in the display section provided that the minimum separation distance from antenna to base of notebook is >= test separation distance and the test separation distance cannot exceed 25mm.