



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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By Electronic Delivery via <https://apps.fcc.gov/oetcf/kdb/index.cfm>

January 10, 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 (LTE Rel. 10 KDB Inquiry Sheet)*

Dear Dr. Doshi:

The Telecommunications Industry Association¹ ("TIA") hereby submits input to the Federal Communications Commission's ("FCC") Office of Engineering and Technology on draft Laboratory Division ("OET Labs") Knowledge Database ("KDB") Publication 941225 (LTE Rel. 10 KDB Inquiry Sheet).

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, tradeshow, 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.

Our specific input is as follows:

Location of Issue/Input	Issue, Proposed Change, and Rationale
3(b)(ii)(2) [pg. 4]	For downlink (DL)-only LTE carrier aggregation (CA) devices where there are no changes to the upload (UL) transmit power, OET Labs should make it clear in this KDB that no additional specific absorption rate (SAR) testing is needed in the DL-only CA mode.
[General]	TIA urges OET Labs to remove DL only CA from the Permit But Ask (PBA) list as quickly as possible. This change is appropriate because there is no change to the UL transmitter.

We respectfully request that OET Labs consider the above comments in its finalization of this KDB. Please contact us using the below information if we can be of more assistance.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli

Brian Scarpelli
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