Page 7, section 1.3, third paragraph: As Part of... 2.1093 (d) (3)....:

➢ Shall be 2.1093 (d) (2)

Appendix C Table 1 formula for $P_{th}$

➢ Shall be Table B1

Appendix C – simultaneous Transmission SAR test Exemption with Respect to Multiple Exemption Criteria

➢ Since the exemption criteria applies to SAR and MPE test exemption, suggest to change the title without “SAR”

Section 3.17 second paragraph: ,but are not directly related to antenna gain. a quantity

➢ Shall be antenna gain. Delete a quantity

Section 4.1.2 Host Form Factor Consideration

Fourth Paragraph: when High SAR values may be expected for any device due to close proximity between antennas and users, the related transmitters may not be approved as modules because of difficulties to ensure compliance for all possible host configurations:

➢ Please help to define or provide guidance on the “High SAR values” .. and highly integrated (host) devices

➢ Please help to define or provide guidance on “Highly integrated (host) devices”

Glossary : Energy Coupling Enhancement Condition – A condition designed to verify that the low SAR value that was measured at the prescribed minimum test separation distance continues to decrease decreasing when the separation distances gets larger.

➢ Delete “to decrease”

Section 5.1.2 Third Paragraph: For portable PTT two-way radios operating above 1 GHz, a KDB inquiry must be submitted to obtain FCC approval for the SAR test procedure

➢ Please clarify this requirement is only for seeking SAR test exemption or as a general requirement for all above 1GHz Push-to-Talk Radios.