

Dear FCC OET Lab,

Thank you for putting together this Draft KDB guidance 996369 D05 for Split Modules and proposed updates to KDB Guidance 996369 D01, D03 and D04. See the below comments specific to the new KDB Guidance 996369 D05. Please consider the proposed updates in **green font**.

Thank you,

Robert & John

Section I Introduction, 3rd paragraph:

To complete the equipment certification process, split modules, unlike single modules ~~are~~ shall be certified and must demonstrate EMC compliance on a test board(s) that are similar to the host device(s). This is accomplished by certifying split modules based on testing in one or more “Host Environment Simulator” (HES, defined in detail in Sect, III), rather than relying only on stand-alone testing (i.e., testing without integration in a host environment, **or with a fixture that represents the host environment**). More than one HES type may be included in the initial application or added at a later time as a C2PC.

Section II Split module Rules, item 3:

Split modules cannot be certified standalone and must be certified through testing in **Host Environment Simulator (HES) device(s)** similar to (i.e., representative of) **the host device(s) ones** where the **split modules** will be integrated in. Guidance is provided below in section III

Section III Split module Host Environment Simulator, 3rd paragraph

Typically, a HES may consist of one or more PCB and conductive structures ~~(internal and enclosing)~~ that mimic the actual host in terms of shape, size, and positioning. The PCBs may just have an overly simplified layout consisting of only grounded and floating conducting areas, conservatively representing the host design. **This can include a fixture emulating the active layout for the hosts. Grant notes must be included for the end integration.**

Section IV Use of HES for the Split Module Certification Process, 1st paragraph:

The HES must be used for all Split Module certifications, and related filings shall include ~~the~~ all of the HES physical details, along with an accurate description of which host(s) the HES is meant to be applied to (i.e., FCC IDs, or manufacturer’s unique model identifiers, if FCC IDs are not available). **If unique model identifiers or FCC IDs are not available a detailed description of the host platform (manufacturer, size/dimension and type) shall be identified, i.e., clamshell laptop with dimensions 20 x 30 cm +/- 2 cm.**

Section V Collection of Test Data for Split Module Certification, 2nd paragraph:

Unlike Single Modules, the *Split Module* is ~~not~~ required to be tested with~~out~~ the HES, i.e., ~~no Split Module~~ testing is required **using an HES as described in Section III. in actual stand-alone conditions.**

Appendix A General RF Exposure Considerations for Module Certification, 1st paragraph

For the purpose of *Module* certification, including split modules, the RF exposure evaluation may require specific testing (for Maximum Permissible Exposure, and/or Specific Absorption Rate) in accordance with applicable KDB Publications, such as 447498 and ~~996396~~ **996369**, that are reflecting more general requirements under § 1.1307 and § 1.1310 of the Rules.