

Template for comments

Date: 13 Oct. 2022

Document: 447498 D01 General RF Exposure Guidance DR05-44791

Section	Figure/ Table/	Type ¹	Comments	Proposed change
2.3.3		ge	There is no description of how estimated SAR of Appendix D to be addressed in TER.	Should be added of how estimated SAR to be addressed in TER.
4.2.2		ge	All the standalone test exemption (not only 1-mW test exemption in Sec. 2.2.1 but also MPE/SAR test exemption in Sec. 2.2.2) should be included. <i>"the Module qualifies for the "1 mW" SAR test exemption of Sec. 2.1,"</i>	Should be changed to: <i>"the Module qualifies for the standalone test exemption of Sec. 2.2,"</i>
5.4.2		ed	Typo: as both OEM and non-OEM accessories are covered in Sec. 5.4.2. <i>"5.4.2 OEM Accessories without RF Transmitters"</i>	Should be changed to: <i>"5.4.2 OEM Accessories without RF Transmitters"</i>
A.2		ge	Regarding power definition and separation distance (such as conducted power vs. ERP, < 5 mm treatment), the requirements in A.2 are inconsistent with that in Sections 2.1.3, 2.2.2, 3.1.2.	Should be changed to be consistent with Sections 2.1.3, 2.2.2, 3.1.2.
D.1		ed	Typo: as the SAR limit is 1.6 W/kg, not 0.4W/kg. <i>"... by multiplying the corresponding ratio by the SAR limit of 0.4 W/kg for 1-g SAR."</i>	Should be changed to: <i>"... by multiplying the corresponding ratio by the SAR limit of 0.4 W/kg for 1-g SAR."</i>
D.3		ed	Typo: inconsistent with the term (approximation) in Sec. 3.3.2. <i>"... or area scan measurement when area scan based 1-g SAR estimation is applicable."</i>	Should be changed to: <i>"... or area scan measurement when area scan based 1-g SAR approximation is applicable."</i>
E.3.4.1		ge	For "Exemptions Based on Power Thresholds Dependent on Frequency and Test Separation Distance", only Appendix B (extended SAR exemption) is cited. Shouldn't Appendix A (MPE exemption and SAR exemption before extension) be added? <i>"When the conditions in Tables and formulas in Appendix B are met, the URS is exempt from being included in the RF exposure evaluation of the device."</i>	Should be changed to: <i>"When the conditions in Tables and formulas in Appendix A and Appendix B are met, the URS is exempt from being included in the RF exposure evaluation of the device."</i>

¹ Type of comment: ge = general te = technical ed = editorial

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Common		ge	<p>There are some requirements where a PAG is required but applicable PAG item is not identified.</p> <p>For example, in the following case, which PAG item should be applied?</p> <p><i>"4.2.4 Module Integration for Standalone Operations for a Single Specific Host Only</i></p> <p><i>When a Module highest 1-g reported SAR is > 1.2W/kg, equipment certification requires a PAG for case-by-case consideration."</i></p>	Applicable PAG item should be identified when a PAG is required.

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