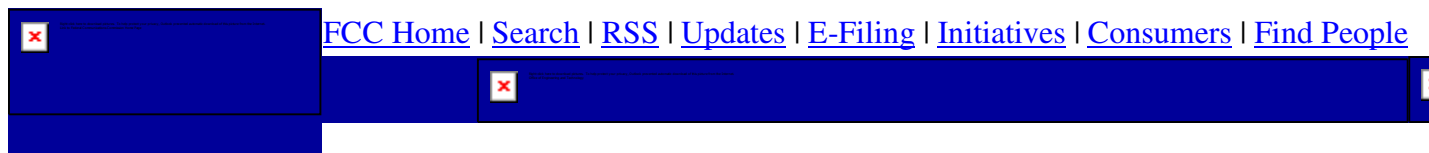


**Sam Lin**

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**From:** oetech@fccsun27w.fcc.gov  
**Sent:** Thursday, February 04, 2016 2:53 AM  
**To:** Sam Lin  
**Subject:** Response to Inquiry to FCC (Tracking Number 858870) (TCB)

**Importance:** High



**Office of Engineering and Technology**

**Inquiry on 10/09/2015 :**

**Inquiry:**

Dear Madam/Sir,

We have a Wi-Fi USB dongle apply FCC certification. But for this USB dongle, it's only sell to HUAWEI, and will not be sold in US and CA general consumer market. This USB dongle will be installed in HUAWEI RTN product (i.e. radio transmission network equipment) for maintenance purpose. It cannot be removed by maintenance person. Generally speaking, the minimum distance between user and HUAWEI RTN product is greater than 20cm. Based on this information, can we skip SAR measurement for this application?

According to KDB 447498, the devices that connect to a USB port but do not operate like the typical simple dongle, we need to send KDB inquiry. Could you please check and advise us?

If SAR measurement is exemption, shall we add some remark in grant note for limit usage condition? e.g. 'The device shall not be sold to general consumer market. This device can only be sold to HUAWEI and installed in HUAWEI's equipment'.

Attached are declaration letter from the applicant and HUAWEI. Also send user manual for your reference.

Best Regards,

Sam Lin

---Reply from Customer on 10/21/2015---

Dear Madam/Sir,

Any update for this inquiry? Appreciated if you could advise.

Best Regards,

Sam Lin

**FCC response on 10/23/2015**

Thank you for your inquiry. In order to provide you with appropriate guidance please address the following items.

1. Will this product be used in the United States? You mention it will not be sold to the general public in the US but will it actually be installed in the US?
2. Please provide a better description of the use conditions. You state it will be installed in HUAWEI RTN (radio transmission radio equipment). Please provide a description of this RTN. This is needed to determine if the 20 cm separation distance requirement for mobile classification can be met at all times during device use.
3. If SAR measurement is required, please confirm you will be applying for the occupational/controlled exposure limits and not the general public/uncontrolled exposure limits. Please note that if you will be applying the occupational exposure limits users must be made fully aware of there potential exposure and be able to exercise control over it. You will need to provide training materials to instruct users how to control there exposure. Also, the device can not be marketed for general use if the occupational exposure limits are applied.

---Reply from Customer on 01/21/2016---

Dear Madam/Sir,

Sorry for reply late.

I received the description of the use conditions. Attached please check the answer from HUAWEI.

Could you please advise this product is exemption from SAR testing?

Thanks for your help.

Best Regards,

Sam Lin

**FCC response on 02/03/2016**

Thank you for the clarifying information. Since this device will be installed outdoors on a tower or roof in such a way that a separation distance of 20 cm or more is maintained between the transmitter's radiating structure(s) and the body of the user or nearby persons, this device qualifies as a mobile device per 47 CFR Ch 1., Subpart A, §2.1091. Hence, the MPE limits listed in Table 1 of CFR Ch 1., Subpart A, §1.1310 can be applied.

**Attachment Details:**

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.