

May 11, 2015

Applicant: Hanmi IT Co., Ltd

FCC ID: 2AD7R-RB-T02

Dear FCC,

We appreciate a lot for your response regarding this inquiry.

The applicant needs to get the TCB certification shortly. So we got applicant's attestation letter for maximum duty cycle of this device.

Based on the maximum duty cycle of this device that is declared by applicant, this device will be exempted from the SAR test as below calculations.

The maximum output power on the tune up procedure is 30 dBm when the transmitter is on. So the maximum average power with maximum declared duty (5.993 %) is 59.93 mW.

When user grips the handle of this device, user's fingers are normally separated about 20 mm from the closest antenna edge. (Refer to Figure 1). So we used 10 mm separation distance as the worst case scenario for the calculation.

Calculation :

Per FCC KDB 447498 D01v05r02, the SAR exclusion threshold for distances < 50 mm is defined by the following equation:

$$\left[\frac{(\text{max. power of channel, including tune-up tolerance, mW})}{(\text{min. test separation distance, mm})} \right] \cdot \left[\sqrt{f_{\text{(GHz)}}} \right] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR}$$

$$\underline{\underline{[(60/10) * \sqrt{0.92725}] = 5.8 < 7.5}}$$

Based on the maximum conducted average power of this device (rounded to the nearest mW) and the antenna to user separation distance, RFID 10g Extremity SAR was not required.

Please review this and allow us to use TCB certification process without the SAR.



<Figure 1>



Hanmi IT co.,ltd

14, Wiryeseong-daero, Songpa-gu, Seoul, Korea

Apr 30, 2015

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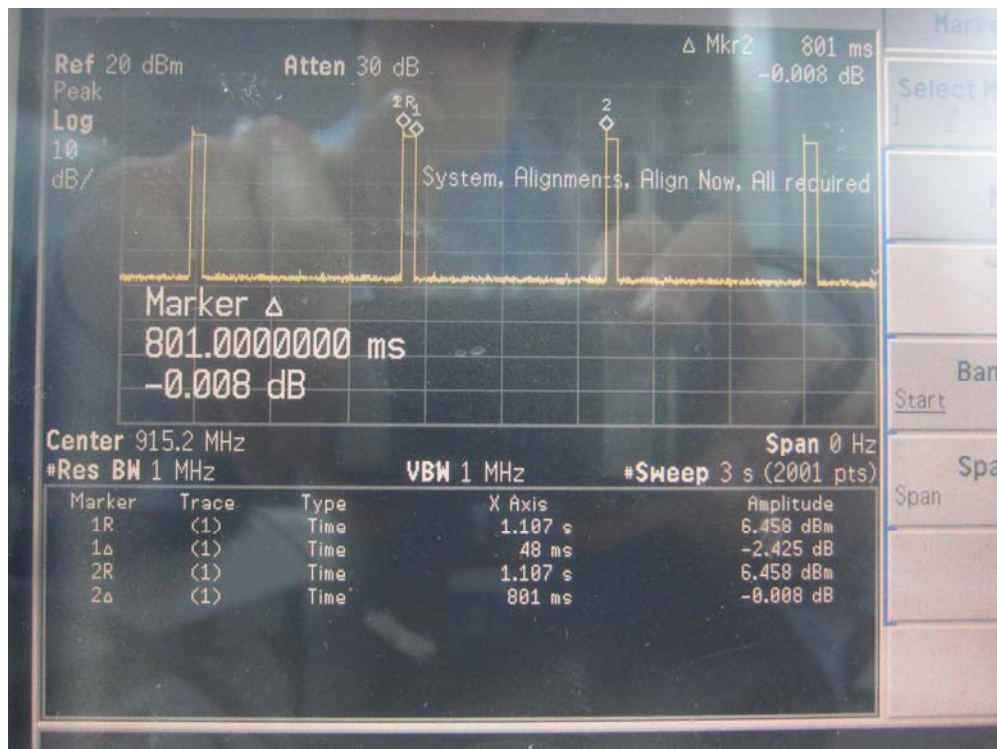
We, Hanmi IT Co., ltd., confirm that the maximum duty cycle of this device is 5.993 % as below.

1. The max duty of device is as follows.

On Time: 48 ms

(On + Off) Time: 801 ms

Duty: 5.993 %



Sincerely,

Chulwoo Jeon

Manager