

To: William Graff  
From: Tim Harrington  
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FCC Equipment Authorization Branch

Re: FCC ID: UBHAVL9X

Applicant: GoPass Technology Corp.  
Correspondence Reference Number: 39719  
731 Confirmation Number: TC537815  
Date of Original Email: 06/18/2007

Subject: audit

TCB to address:

1) Eqpt-class PCT seems inconsistent with user manual and op. desc. indictating this is vehicle-mount device. Usually vehicle-mount device should have eqpt-class PCB. Please explain intended and expected normal operating configurations and body-worn conditions if any.

Grant has bee changed to PCB

2) If device does not have normal operating configurations as immediately adjacent to person's bodies, please explain purpose to have SAR report in filing for what appears to be a mobile device categorically-excluded from RF exposure routine evaluation per 2.1091(c).

This product is not portable device. The antenna is fixed with the EUT, and the customer may use the product in the car. However the manufacturer voluntarily submitted and requested a SAR review since they can not guarantee the distance with body while clients use. For SAR positioning, the SAR lab used the the strictest way to estimate that the closest distance as 1.5 cm.

3) In general, SAR evaluation should not use a contrived spacing between device and person's bodies unless device design and/or operating conditions and/or intended accessories provide a means to maintain such spacing. Please explain how end-users can maintain 1.5 cm, and/or revise where appropriate.

The intended use in mobile – see response 2 above.