From: oetech@fccsun27w.fcc.gov

**Sent:** Tuesday, January 08, 2013 11:46 AM

To: danield@baclcorp.com

**Subject:** Response to Inquiry to FCC (Tracking Number 282376) (TCB)

Importance: High
Follow Up Flag: Follow up
Flag Status: Red



## Inquiry on 09/13/2012:

Inquiry:

Hello,

This TCB inquiry is submitting for Burg Realisation Hong Kong Ltd., the GSM/GPRS wrist watch phone with FCC ID: YIABURG12.

Recently, we got FCC PBA approvals for the similar products (KDB709811, KDB680370) using the typical wrist phone SAR procdure proposed by FCC. The test lab has performed the SAR scan using the same procedure for the current device.

Please advise if anything else is required.

Thanks.

BACL

---Reply from Customer on 09/13/2012---

Hello,

FCC ID: YIABURG12 TC Number: 714921

Form 731 and exhibits have been uploaded and ready for FCC review.

Thanks.

**BACL** 

FCC response on 09/19/2012

. Please identify the material used in the body and bands of the wrist watch;

especially metallic and conductive parts

- a) indicate if any components are flexible; leather, soft plastic etc.
- 2 Please confirm /identify if any part of the bands may contain electronic parts and components; e.g. keypad, antenna etc
- 5. Provide photos of the device with bands taken off, if feasible, and the back side of the wrist watch placed on a flat surface, identify the separation distance between the back side of the wrist watch and flat surface
- 6.identify if the parts that do not allow the back if the wrist watch to be in direct contact with
- a flat surface can be removed or eliminated either non-destructively or destructively
- without changing the transmission characteristics of the device to enable SAR testing in

direct contact with a flat phantom

a) if necessary, more than one sample may be necessary to facilitate SAR testing,

destructively and non-destructively

7 identify the normally expected operating configurations and exposure conditions with respect to available features

8, provide ?clear? photos if the device in various orientations and configurations to support the above for determining appropriate SAR test configurations

- 9. Ensure that device manual must indicate device usage as "wrist worn only" compliance
- 10. Clarify if the device be worn as a pendant around the neck For this use condition if applicable, please include 1g body tissue SAR values for EUT for both GSM bands
- 11.Please provide additional photos that clearly show the distance between the antenna and phantom and how flat against the neck the antenna is to the phantom
- 12. Please provide voice mode SAR results for 1 cm from flat phantom, head liquid with 1.6 W/kg limit.
- 13.Please provide detail operational description that complies with requirement
- --- Reply from Customer on 01/04/2013---

Hello FCC Expert,

We got the updated files and reply your concerns as below:

- 1) The material of band is soft plastic, the material of body is plastic on front side and metal on back side. The junction between body and the band is plastic but not flexible. Other portion of band is flexible.
- 2) The GSM antenna is built in the band close to the junction between the body and the band.
- 5) The band can not be taken off and place to the flat surface. Please refer to the EUT photos.
- 6) It's impossible to allow the entire back of the wrist to be in direct contact with a flat surface without changing the transmission or damaging the antenna. Please refer to the EUT photos.
- 7) The normal operation configuration is speaker on mode and wrist worn mode under the uncontrolled exposure condition.
- 8) Please refer to the SAR report setup photos
- 9) The wrist worn only has been addressed on section 8 of user manual.
- 10) The device can not be worn as a pendant around the neck.
- 11) Please refer to the revised SAR report.
- 12) In SAR report, test Position A is the voice mode with 1 cm distance from flat phantom using head liquid.
- 13) Please refer to the updated circuit description.

Please review the application and let us know if any else needed.

Thanks.

BACL

## FCC response on 01/08/2013

f-731 is cleared for continued TCB processing and granting

## **Attachment Details:**

<u>Updated Users Manual</u> <u>Updated SAR Report</u>

Do not reply to this message. Please select the <u>Reply to an Inquiry Response</u> link from the OET Inquiry System to add any additional information pertaining to this inquiry.