Federal Communications Commission Office of Engineering and Technology March 22, 2011

Re: FCC ID: YIBSEA157S

FCC Registration No: 0017527912 Form 731 Confirmation No: EA175426 Correspondence Reference No: 39577

Subject: FCC Equipment Authorization System

Re:

Per 47 CFR 1.1307(b)(1), appropriate exposure limits in §§ 1.1310 and 2.1093 of are generally applicable to all facilities, operations and transmitters regulated by the Commission. Per the definition of a mobile device [2.1091(a)], a minimum separation distance of 20 cm is required; otherwise SAR compliance evaluation is needed for devices designed to operate at closer than 20 cm from persons. 47 CFR 2.1033(c)(3) requires appropriate device operating and installation instructions to be submitted during equipment certification; such instructions should describe the minimum separation distance and other constraints required for the device and its antenna(s) to meet MPE limits. Antenna installation conditions must be able maintain the estimated minimum MPE compliance separation distance. Vehicle-mounted and shipboard transmitters normally should provide antenna and transmitter installation and operating instructions in to ensure compliance with General Population / Uncontrolled limits. Please submit revised or amended install/operating instructions to address the preceding considerations. 1) If you want to list 156 MHz - 162 MHz on the grant for Part 90, submit the letter exhibit requesting extended range of frequencies see KDB 634817. If not, we will have to list 156 MHz - 156.2475 MHz Part 90, 157.1875 MHz - 161.575 MHz Part 90, and 161.775 MHz -161.9625 MHz Part 90 on the grant. Please advise. FYI: Your test reports need updating in future applications. We will not accept edited plots in the future. Make sure that the test data is taken within the bands listed in the application.

Response:

We have amended page 6 of the SEA 157s Operator's Manual with the addition of the following paragraph: (Please see full amended page as separate attachment)

Antenna installation and RF Exposure Safety Warning:

To comply with FCC Limits for Human Exposure to Radiofrequency Electromagnetic Fields for General Population/Uncontrolled Exposure, the antenna must be mounted in such a manner as to prevent passengers or personal from coming within 1 meter (39.4 inches) of the radiating portion of the antenna. (Re: FCC OET Bulletin 65, Section 4, Public Exposure)

Regarding Part 90 frequencies, please list 156 MHz - 156.2475 MHz Part 90, 157.1875 MHz - 161.575 MHz Part 90, and 161.775 MHz - 161.9625 MHz Part 90 on the grant.

We would also like to request that 162.0375 - 162.0500 MHz Part 90 be allowed on the grant.

Sincerely,
Gary L. Kison
Senior Engineering Technician
Sea Com Corp.
7030 220th St. SW
Mountlake Terrace, WA 98043
425-771-2181 x145
Fax: 425-771-2650
gkison@seacomcorp.com