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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies - ET Docket Nos. 13-84, 03-137

Dear Ms. Dortch:

Hewlett-Packard Company (HP) is cognizant that the following comments are being submitted after the official comment period has expired, however we would still like to respectfully submit in order to make these comments as part of the public record. The comments being submitted are pertaining to the referenced ET dockets Nos. 13-84 and 03-137.

HP recommends that the FCC allow for implementation of wireless transmit power averaging techniques to achieve SAR compliance over a specified time from host-based algorithms. Currently FCC allows only sourced-based architectures (i.e. TDMA) to implement transmit power averaging for SAR compliance.

HP strongly supports many other industry comments that have recommendations towards the same time based averaging direction. See, e.g., TIA Comments at 9-11; CEA Comments at 4, 9-10; and Mobile Manufacturers Forum Comments at 28-29.

By defining a specific time window in which to assess SAR compliance for a wireless device, manufacturers can utilize time-based algorithms within the host device to accurately track and average a device's transmit power versus over time. The SAR exposure threshold could be maintained over this period of time via dynamically reducing transmit power and/or some other methods deemed acceptable by FCC.

Moving to a time based approach would allow for better user experience, enable system antenna design flexibility and improve manufacturability. All this is accomplished while still ensuring the user is safeguarded and the device is operated within existing SAR exposure limit levels.

HP is actively working with a group of partners from across the mobile electronics industry to develop this time based SAR mitigation technique for end user mobile technology devices. The

group is growing and consists of members from the various notebook/tablet OEM manufacturers, core IC suppliers, cellular network carriers and Telecommunication Certification Bodies.

Therefore, HP strongly encourages the FCC to follow industry recommendations and define a compliance time window whereby any wireless technology can demonstrate SAR compliance using any validated power averaging technique over a certain defined time period.

Respectfully submitted,

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