

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:

The comments being submitted are pertaining to the referenced ET dockets Nos 13-84, 03-137.

Ericsson recommends that the FCC allow for implementation of wireless transmit power averaging techniques to achieve SAR compliance over a specified time.

Ericsson supports 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 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.

Therefore, Ericsson 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,

Bernie Fuller

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