



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

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

Dear Ms. Dortch:

Intel Corporation respectfully requests that these late-filed comments be made part of the public record in the above referenced proceedings.

Intel recommends that the FCC allow transmit power averaging techniques to dynamically maintain RF exposure compliance over a specified time controlled by the host or module. Intel strongly supports other industry comments that have made similar recommendations for time based averaging, e.g., TIA comments at 9-11; CEA comments at 4, 9-10; and Mobile Manufacturers Forum comments at 28-29.

Given the fact that manufacturers can implement time-based algorithms within the host device or module to accurately track and average a device's transmit power over time, the RF exposure compliance could be maintained by dynamically reducing transmit power, duty cycle and/or other methods deemed acceptable by the FCC.

This approach would enable innovation, provide flexibility in system design, reduce cost and improve manufacturability, while maintaining compliance with RF exposure requirements.

Therefore, Intel strongly recommends the FCC allow broader use of transmit power averaging techniques to dynamically maintain RF exposure compliance over a specified time controlled by the host or module.

Respectfully submitted,

/s/ Peter K. Pitsch

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Intel Corporation