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November 18, 2013

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:

Qualcomm is pleased to submit these short reply comments on two issues raised in the above-referenced dockets. *First*, Qualcomm strongly supports industry comments requesting that the FCC allow the use of power averaging techniques to demonstrate SAR compliance over a defined period of time for wireless technologies other than TDMA sourced-based architectures. *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, manufactures can utilize advanced algorithms that track transmit power versus time for all operational radios within the device and dynamically control the transmit power whenever needed and whenever possible to optimize system performance while maintaining SAR compliance within the defined time window at all times. These advanced techniques will provide increased throughput to the device and an improved end user experience without exceeding SAR requirements. Therefore, Qualcomm encourages the FCC to follow industry recommendations and define a compliance time window where any technology can demonstrate compliance using any validated averaging technique.

Second, Qualcomm requests clarification on RF exposure assessment requirements for signals below 100 kHz as new technologies, such as wireless power transfer systems, are being designed and implemented for operation at these low frequencies. In this regard, Qualcomm supports TIA's request that the FCC adjust MPE frequency ranges and introduce basic restriction requirements consistent with ICNIRP 2010 recommendations, and thus provide a clear and harmonized RF exposure assessment process.

Respectfully submitted,

John W. Kuzin

John W. Kuzin
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