IGKDA118

| Re: FCC ID: | |
|-------------|-------------------|
| | |
| | Nielsen Audio Inc |
| Applicant: | |

Correspondence Reference Number:

TC851062

183526

Form 731 Confirmation Number:

09/22/2014

Date of Original E-mail:

1) Filing is ambiguous due to different 22/24 output powers listed in EMC/radio and SAR reports without any explanation (i.e., for each is it burst peak, burst average, frame average, or what).

TCB please coordinate with lab for updating exhibits to clarify and TCB review before upload. [Lab Response]: the first table in the measurement summary section of the SAR test report had a typo in the conducted power column. This has now been corrected. The power is Peak power.

2) Unless it is in filing already (if yes please say where), info about GSM/GPRS modes and modulations used is needed (e.g., MCS, # TX slots, etc.), in both EMC/radio and SAR reports.

TCB please coordinate with lab for updating exhibits to clarify and TCB review before upload. [Lab Response]: As shown in tables on page 2 and 5 of the SAR test report and Overview table in the EMC test report the only mode supported by the EUT is GSM. The modulation used is GMSK. The EUT does not support GPRS or EDGE.

3) Dues to difference in antennas between IGKDA118 and IGKDA120, it is reasonably expected each can have different maximum measured SAR. Unless it is in these filings already, please amend with reported SAR for highest channel and mode per band for each device, or explicitly identify other FCC policy or procedure or case-specific allowance if any to support equivalent SAR reports under both FCC IDs.

[Lab Response]: The two models are identical. The only difference between the two models is the gain of the antenna. Model DA118 is tuned for North American frequencies whereas the DA120 is tuned for EU frequencies. The antenna gain for DA118 in the GSM 850 and 1900 bands are 0.17 dBi and 1.8 dBi respectively. The antenna gain of the DA120 in the GSM 850 and 1900 bands are -2.9 dBi and -1.2 dBi respectively. There is approximately 3 dB less gain in the DA120 model. SAR test was performed with the DA118 with higher gain antenna. It is reasonable to assume that this will have the higher SAR value. The antenna gain information was included in the filing labelled FCC and IC Operational Technical description for Models DA118 and DA120.pdf.

4) For the preceding items:

TCB please advise test lab to modify their internal processing and report templates to preclude similar ambiguities and incompleteness for ALL future submissions.

TCB please modify internal processing procedures to preclude similar ambiguities and incompleteness for ALL future submissions.

Advised.