

**From:** oetech@fccsun27w.fcc.gov  
**Sent:** Monday, September 22, 2008 5:56 AM  
**To:** hotline  
**Subject:** Response to Inquiry to FCC (Tracking Number 341545) (TCB)  
  
**Importance:** High



## Office of Engineering and Technology

### Inquiry:

---Reply from Customer on 09/19/2008---

The applicant has provided the answers to the technical question you posed. They have been uploaded as attachments to this response. I have also included the text answers below for your convenience. All questions have been addressed. Please let us know as soon as possible the initial upload of the filing OK. 1) The following information from the grantee/manufacturer or its test laboratory is requested with this PBA: a) Verify the test configurations against device specifications and 802.20/3GPP2/iBurst requirements; including but not limited to any industry test profiles defined for the specific frequency bands, channel bandwidth options and multiplexing configurations (TDD/FDD). More detailed operating and test parameters need be included in the PBA request; =Enhancing specification version of iBurst took in the standard of IEEE802.20. But regarding this UTW, it is not Enhancing specification version of iBurst, it doesn't use enhancing technology like as OFDM and MIMO. Please refer to the attached latest User Terminal 2Mbps Desktop type(UTW) Specification, we would like you to check page 2&3 particularly. And regarding the connection with Specification of UTW and testing condition, we mentioned to the attached latest Test report page 6. b) The transmission and operating configurations that the DUT is capable of must be clearly identified; for example, frame structure, sub-frame configurations, applicable data formats/structures; =Please refer to the attached User Terminal 2Mbps Desktop type(UTW) Specification, this is the latest version and please refer to the page 2 particularly. c) The maximum output power measured should be verified against those specified by the manufacturer. This data is to be provided. (DW note the tune up procedure, mfg specs, manual and test report all need to be within reasonable variation ? i.e. 0.5dB conducted and/or 3dB eirp) =Please refer to the attached User Terminal 2Mbps Desktop type(UTW) Specification, Page 4 and Test report Page 15. d) The transmission configurations and conditions used during the EMC and radio parameter measurements must be fully specified and described, including the sub-carrier configurations and modulations applied to the sub-carriers, to demonstrate the signal characteristics and test configuration(s) used are appropriate and conservative for demonstrating maximum exposure conditions have been tested to show compliance; =Enhancing specification version of iBurst took in the standard of IEEE802.20. But regarding this UTW, it is not Enhancing specification version of iBurst, it doesn't use enhancing technology like as OFDM and MIMO. Please refer to the attached latest "User Terminal 2Mbps Desktop type(UTW) Specification", we would like you to check page 2&3 particularly. And regarding the connection with Specification of UTW and test condition, we mentioned to the attached latest Test report page 6. e) Testing of smart-antenna / beamforming / MIMO modes. (DW ? if smart antenna technology is not used this needs to be fully explained and verified). =Enhancing specification version of iBurst took in the standard of IEEE802.20. But regarding this UTW, it is not Enhancing specification version of iBurst, it doesn't use enhancing technology like as OFDM and MIMO. Please refer to the attached latest User Terminal 2Mbps

Desktop type(UTW) Specification, we would like you to check page 2&3 particularly. 2) Identify and resolve all related issues and provide the necessary justification for the FCC to determine if a TCB is able to conduct a thorough review to approve the filing. Items to be addressed include: a) appropriateness of the test methodologies and results for demonstrating compliance =Please refer to the Test report page 6, we mentioned connection with Specification of UTW and test condition. b) explain with proper supporting info how tests are conducted in the specific manner/configuration and why the results are acceptable =Please refer to the Test report page 6, we mentioned connection with Specification of UTW and test condition. c) how the applicant intends to address specific issues mentioned in the filing (i.e. control of operating parameters etc.) =We can not understand what you need specifically, but we think it will be solved attaching User Terminal 2Mbps Desktop type(UTW) Specification and Test report. d) identify the potential issues and explain how to resolve these with the grantee =We can not understand what you need specifically, but we think it will be solved attaching User Terminal 2Mbps Desktop type(UTW) Specification and Test report. e) what concerns the TCB may have that would require FCC decisions (DW This ATCB will provide to the FCC when all other information is provided) =We can not understand what you need specifically, but we think it will be solved attaching User Terminal 2Mbps Desktop type(UTW) Specification and Test report. f) provide the specific information and proposal on issues that need resolution above ?We can not understand what you need specifically, but we think it will be solved attaching User Terminal 2Mbps Desktop type(UTW) Specification and Test report. 3) All questions and discrepancies identified during this final FCC review must be addressed and resolved between the TCB and grantee before grant authorization can be issued. As you can see from the above and from the previously improperly granted devices, there is a lot more to HC-SDMA than was seen by the other TCB. Please note that one reason I feel the previous grants are improper is that first they were tested to a draft 802.20 standard, second they were improperly tested (i.e. no justification for the test modes used) as there is no established test procedure other than TIA603C for this new technology and thirdly, at the time of granting there was apparently no licensed services supporting this technology in the US. =Regarding the previously improperly granted devices, we don't think these are improperly granted because we applied these as User Terminal devices. As you know, iBurst is standardized HC?SDMA by ANSI.. But Spatial Division Multiple Access technology, SDMA which transmit same three frequencies simutaneouly is for base station, it is realized by the technology of Adaptive Array Antenna. So even though User Terminal has two transmitter, it transmit different frequencies simutaneouly. And its Modulation are 16QAM?Up Link?, single carrier and No MIMO, not 802.20. As we mentioned to the beginning, enhancing type of iBurst had been standardized as 625K-MC which one of 802.20 standard, so please do not confuse with this time application device. Please provide the answers to the above questions and concerns. Please do not provide them in an email, but in corrected documentation such as test reports, operating descriptions, operating mode justification, manuals etc. =Please refer to the revesed Terminal 2Mbps Desktop type(UTW) Specification and Test report.

**Response:**

this application approved for initial e-filing upload

- after upload but before grant, please list TC and FCCID in reply herein to request final grant approval

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.