Chris Harvey

From:	aven.zhou [aven.zhou@cn.ccsemc.com]
Sent:	Wednesday, May 28, 2008 12:07 AM
To:	charvey-tcb@ccsemc.com
Cc:	charvey-tcb@ccsemc.com; lucy.tsai@ccsemc.com; tillyping@gmail.com
Subject:	Re:Uni-Art Precise Products Ltd, FCC ID: MVADHP390-001R, Assessment NO.: AN08T7825, Notice#3
Attachments:	auto scale.pdf; KS080201A01FC_SAR_0509.pdf; KS080201A01_0509.pdf; theory of operation_0528 (base + headphone).pdf

If there is any question,please contact me without hesitation!

Thanks & Best regards!
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Dear Aven Zhou,
I have received response to Notice #'s 1, 2 & 3, but still have not received responses to the following items. Please be sure that when you respond you have actually responded to all questions in detail:

1.You have provided revised test report and Operational Description exhibits but still have not addressed the following items:

a.There is no indication that the frequency selection is Random (in fact the plots seem to continue to show transmissions at regular intervals). There is no indication that every frequency is used equally on average. There is no indication that the receiver has the same input bandwidth as the hopping channel bandwidth. There are no statements of compliance with FCC 15.247(h) and 15.247(g). This device does not appear to meet the requirements of 15.247 for FHSS devices.

b.There is no indication of whether there are different modes of operation where the hopping or modulation are operating differently. There is no indication if during the 26 Channel Auto Frequency Selection Mode the transmitter operates differently than during normal operation mode.

<Aven> The attached is the reivsed operational description, please check if it is ok?

2. The SAR test report indicates on page 23 that the Crest Factor information is a DASY parameter. The test report does not document that the DASY system was used for this SAR test. Please explain and correct as needed.

<Aven> Please see the revised SAR Report.

3. The SAR test report documents that the crest factor is 100%. Please confirm that this is correct for this FHSS device.

<Aven> We did the duty cycle test before the SAR test, and the value is 10%, so the crest factor is 10. Please see the revised SAR Report.

4. The SAR report indicates that the SAM Phantom is fiberglass on a wooden table. The photographs of the phantom show a black table which appears not to be made of wood. Please confirm the material of the wooden table.

<Aven> The black table is exactly made of wood.

5. The SAR compliance plots, report and probe calibration exhibits do not seem to show the ConvF Probe Factor for the SAR measurements. Please either explain where these factors are listed (including on the plots) or update the SAR exhibits to include this information.

<Aven>About the probe factors, in ANTENNESSA, they calibrate the probe directly in the liquid for a greater precision of calibration instead of calibrating them in air and apply a conversion factor, So there is no ConvF probe factor for the SAR measurement.

6. You have described the z-axis plot situation as being due to low SAR values, however different plots with similar Max SAR values have very different z-axis plots. The range of SAR values on the vertical axis of the plots varies, which can explain why some of the z-axis plots look like horizontal lines and some are erratic.

<Aven>
Yes, the z-axis plots look like horizontal lines is because the scale of the SAR value varies.
We had contacted the ANTENNASSA (who sold us the SAR test system.); they adjusted the software to make it sensitive enough to catch the SAR value of this EUT. And we created the test plot by new software again. So the z-axis plots are not erratic anymore.
Sorry for this problem.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

Best regards,

Chris Harvey
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