

Lucy Tsai

From: gina.lo [gina.lo@ccsrf.com] on behalf of application.2009 [application.2009@ccsrf.com]
Sent: Tuesday, March 03, 2009 1:43 AM
To: Lucy Tsai
Cc: application.2009
Subject: Re:RE: RE: Re:FW: CyberTAN Technology Inc., FCC ID: N89-MM230M, Assessment NO.: AN09T8870/AN09T8871, Notice#1-2
Attachments: MM230-M, MM210-M User Manual-2 Revised 0303.pdf; MM230-M, MM210-M Test Report for DSS Revised 0303.pdf; MM230-M, MM210-M Test set up photo for DSS Revised 0303.pdf

Dear Lucy,

Please see my reply, thank you.

Q#1: According to the Class II permissive change letter, C2PC filing is to alternate a portable configuration only, no other changes made.

However, compared to the original test report, the output power measured in this C2PC filing is more 2dBm higher than the original filing, especially in 8DPSK. It is not reasonable. Besides, per FCC Permissive change policy, an increase in maximum output power rating is required a new FCC ID. Please address.

Ans: Power was reduced to consist with original filing. Please see revised DSS test report.

Q#2: By checking with original filing, the antenna used in this filing is different from original. Please document it into the C2PC letter as well.

Ans: The client revised the FCC Class II permissive change letter.

Q#3: Page 7 of DSS test report described "...8DPSK emits the highest output power. Then the tests were carried on with DH1 compare to DH3 & DH5 and found that 8DPSK with DH5 emit the highest output power, and therefore had been tested under operating condition." It doesn't agree with original filing and the test behind. Please address.

Ans: We revised the test report for DSS (page 7, 14, Date of Issue), please have documents as the attachment.

Q#4: User manual mentioned that radio transmitter equipped in this device is Intel module and except 2.4GHz transmitters, 5GHz transmitter is also applicable. It also mentioned that this device should be used more than 20 cm (8inches) from body when wireless device are on. All these information shown on the user manual do not agree with this application.

See page 33, 35, 37, 179-186 for details and address all the issues.

FYI: whether hand held device is subject to SAR test, please refer to KDB447498 to make the justification.

FYI: This application will only focus on CyberTan's BT/802.11BG module. If other transmitters are applicable, OEM integrators/manufacturers shall do the necessary action to make sure FCC rule are well followed.

Ans: 1. The antenna of the EUT is less than 20cm to human body during the operation and user manual was revised.

2. Other 5GHz or 2.4GHz RF modules as mentioned in the user manual are the second sources which are not included in this filing and will get the necessary approval when they are applied.

Q#5: According to user manual page59, 64 and 66, the landscape can be rotated but there are no information mentioned that it has been investigated during

the RF and SAR tests. Please address.

Ans: The client confirmed that rotation function indicated in the user manual is not workable. It doesn't apply to this C2PC filing.

Q#6: According to page 177 of the user manual, there are two batteries applicable, one with 4 cell capacity and another with 6 cell capacity.

Please explain if both have been investigated during SAR test.

Ans: There is one battery with 4 cell capacity.

The client revised the User manual (page 177), please have document as the attachment.

Q#7: Please correct the cube grid point setting specified in SAR test report to consist with 7x7x9 as set in test plots.

Ans: Please see upload file "SAR Test Report.pdf" page 12.

Q#8: Per Q#5, since the EUT can be rotated 90 degree in clockwise/counterclockwise, but SAR test only conducted the bottom to phantom mode as mentioned in page 19. Please address.

Ans: The client confirmed that EUT does not have Rotation function though user manual has included rotation function description.

Q#9: KDB647484 doesn't apply to this device. Per the configuration, this device shall be classified as hand held used or portable used which should follow KDB447498.

Ans.: SAR test was revised.

Best Regards,

Gina