From: Bruno [bruno@timcoengr.com] Sent: Friday, July 14, 2006 1:38 PM

To: tei@timcoengr.com

Subject: FW: TIMCO-TCB/Request for additional info - VERTU LTD. - FCC

ID: P7QRHV-8

----Original Message----

From: Christina Fischer [mailto:christina@agiletestgroup.com]

Sent: Friday, July 14, 2006 1:07 PM

To: Bruno Clavier

Subject: FWD: TIMCO-TCB/Request for additional info - VERTU LTD. - FCC

ID: P7QRHV-8

----- Forwarded Message -----

From: JON (Jon Hartman) < GoldMine User>

To: ERICA (Christina Fischer) < GoldMine User>

Date: Fri, 14 Jul 2006 09:30:58 -0700

Subject: TIMCO-TCB/Request for additional info - VERTU LTD. - FCC ID:

P7QRHV-8

Bruno,

Please see our answers below:

Thanks

Jon Hartman 480-926-1775

From: "Bruno" <bruno@timcoengr.com>

To: <info@mflom.com>

Date: Tue, 11 Jul 2006 08:52:18 -0400

Subject: TIMCO-TCB/Request for additional info - VERTU LTD. - FCC ID:

P7QRHV-8

TIMCO ENGINEERING INC.

TCB & FCB

849 NW State Road 45

FCC Approvals

Newberry, Florida 32669 Industry Canada Approvals http://www.timcoengr.com Notified Body for Europe

888.472.2424 F 352.472.2030 email: tei@timcoengr.com

7/11/2006

MR. DAVID LEE M. FLOM ASSOCIATES, INC 480-926-3100 480-926-3598 info@mflom.com

SUBJECT: VERTU LTD. - FCC ID: P7QRHV-8

REFERENCE: JOB 2043UC6 & 2044UC6

Dear MR. LEE:

This application is on hold until these questions are resolved. Please answer all question(s) together and only respond to tei@timcoengr.com. Any other method will cause unnecessary delay. DO NOT HIT REPLY! Responses should also contain the Reference information, as shown at the top of this message. If acceptable response is not received within 2 week the job will be closed & there will be additional charges to reopen.

Based upon our review of this application we have the following questions:

1) LABEL SAMPLE: Please have the applicant update the label sample to list a colon (:) instead for a slash (/) after the words FCC ID and IC. Thanks.

Please see revised label, attached.

2) TEST SETUP PHOTOS: The Test Setup photos were not received for the Bluetooth portion. Please submit. Thanks.

Please see test setup Photos attached.

3) SAR report – radiated output power sections 1.2 and 7: The maximum ERP and EIRP listed in this report are different from the power listed in

the part 22/24 RF test report and the application form 731. Please explain such variation. Powers in SAR report must agree with EMC report and tune-up procedure and Conducted power in SAR report should be greater than or equal to what is in EMC report, but not exceeding tune-up/tolerance. Please explain power level reported in section 7.0 as well.

The Part 22 and Part 24 radiated power reports (FCC_0623_08) and (FCC_0623_10), show radiated powers for both the 1900 and 850 bands respectively. In tables 2.3 in both cases. These show the maximum powers at all measured points in the band.

The SAR report (SAR_0623_04) shows the full range of SAR measurements in head and Body possition, as opposed to free field.

The power values quoted in the SAR report in section 1.2 are a summary at the channels where the maximum SAR values were measured. Section 7 shows all power levels, taken directly from the part 22 and part 24 reports, for worst case configurations.

This SAR presentation follows an accepted pattern that has been officially used for some time now.

On the basis of the above, the SAR and Radiated power measurements do agree technically, the highest values are those quoted in the 731 application. For the Tune up procedure, this is performed as a conducted and not Radiated measurement at the output of the RF module, and in so doing tolerances apply.

We enclose an amended Tune up procedure, Version 2, 12th July with additional comments on page 3 to explain this.

- 4) SAR report: Scaling up or down 5% is allowed. Please explain scaling of 12%. Please provide additional data such as output power vs. time. Additional SAR data may be necessary to show that the maximum SAR value measured is conservative (e.g. short scan SAR may be appropriate in this case, etc.).
- SAR the following response has been provided by the SAR Laboratory: The global IEC SAR measurement standard, currently under preparation, recommends scaling up of SAR values by the magnitude of the SAR drift. The maximum drift during the measurements of FCC ID: P7QRHV-8 and IC ID: 4299A-RHV8 is given in Section 1.2.3 of the SAR report. The magnitude of the drift was 0.45dB and using a scaling factor of 12% (0.5dB) gives a conservative estimate of the SAR values.
- Since the start of 2006, Nokia TCC SAR labs have used the above scaling procedure in it's SAR reporting to FCC and Industry Canada.
- 5) EMC part 22/24 & 15.247: Please provide a statement of compliance for

IM product emissions when BT + GSM co-transmit.

Please see revised test report, attached.

Sincerely,

Gretchen Torres & Bruno Clavier

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