

1.) Radiated Carrier Output Power test appears to have been performed using a field strength measurement converted to EIRP. This is not acceptable to the Commission. Only the substitution method at the carrier frequency similar to that used for your Spurious Emissions test is satisfactory. Please note that testing on a standard .8M high tabletop may produce unreliable results because of ground reflections. Be sure to identify the signal source used to feed the substitution antenna.

Following results were measured using substitution method in unechoic chamber:

1850.2MHz	29.5 dBm EIRP	891 mW EIRP
1880.0MHz	28.9 dBm EIRP	776 mW EIRP
1909.8MHz	29.2 dBm EIRP	832 mW EIRP

Maximum radiated power output was sought rotating EUT 360 degrees. At each measured angle antenna was lowered and raised between one and four meters using both horizontal and vertical polarizations. Maximum radiated emission was recorded. After this EUT was replaced by a ½ wave dipole, which was polarized in accordance with the measurement antenna. Dipole was fed with a signal generator connected to amplifier using GSM modulated signal and its level was raised until the same field strength was reached than with EUT. Used level was then measured at the dipole feeding point, which is the ERP level. EIRP was calculated using known gain of dipole antenna.

2.) If available, a chart of EUT antenna gain over frequency within the 1850-1910 MHz PCS band would be helpful.

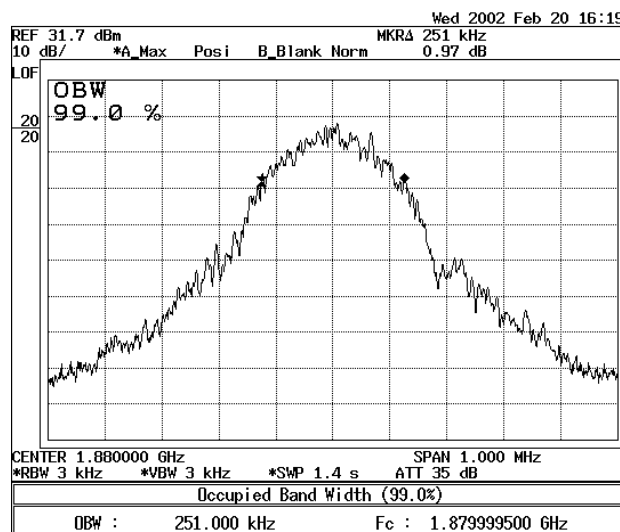
Unfortunately this information is not available.

3.) Test Equipment listed on pp. 20 of 26 appears to be out of calibration. Please advise.

Test report shows all the equipment to be calibrated.

4.) Please provide justification for 256K necessary bandwidth. A plot showing measured values would be appropriate.

Measured 99% OBW is 251K.



5.) This device appears capable of transmitting high speed data. If so, then can it transmit across multiple time slots? Assuming it can, this could affect the total mean power and SAR probe crest factor. Please advise.

There is currently no network support for HSCSD nor any plans of implementing it in USA.

Maximum available time slots for HSCSD is 2. Used modulation method and power output are similar to GSM mode. Therefore and just in case, we request that existing measurement values are doubled for body-worn measurements. HSCSD dual-slot operation is available only for data mode; therefore when this device is used in normal conversation, only a single-slot mode is available. Corresponding value in the user guide will be updated from 0.33W/kg to 0.66W/kg.

Mode	Channel/ <i>f</i> (MHz)	Power (dBm)	Ant In/Out	SAR, averaged over 1g (mW/g)		
				CSL-25	CSL-26 Position 1	CSL-26 Position 2
HSCSD 1900	512/1850.20	29.8	In	0.28	0.38	0.44
		29.8	Out	0.56	0.66	0.42
	661/1880.00	29.8	In	0.24	0.30	0.34
		29.8	Out	0.50	0.58	0.30
	810/1909.80	29.7	In	0.16	0.18	0.30
		29.7	Out	0.42	0.52	0.34

6.) Measurement uncertainty does not appear to conform with FCC's current recommended practice. Please review.

New attachment has been uploaded.

7.) FYI: Tissue fluid temperature for each test printed on each plot is advisable.

This is already a standard procedure, but at the time when this particular report was prepared, it was not yet required.

8.) What is the expected range for RF Pout in production? SAR values can be scaled up to 5% from measured values to cover "worst case" conditions.

Comparing tuning levels of measured sample to mass production tuning targets reported SAR values are regarded to be appropriate. Tuning target values are reported in Exhibit 10.