



April 9, 2002

Federal Communications Commission  
Equipment Approval Services  
7435 Oakland Mills Road  
Columbia, MD 21046  
Attn: Martin Perrine

**SUBJECT: Withus IT Co., Ltd.  
FCC ID: POQWCE-210**

Dear Martin:

On behalf of Withus IT Co., Ltd., we hereby submit our response to the set-aside letter dated April 08, 2002 from Mr. Kenneth Nichols of the Commission, requesting additional information for the subject application.

EMC:

1. Attached are the remeasured band edge plots showing compliance with the band edge requirements for CDMA mode.
2. Using a spectrum analyzer with video and resolution bandwidths of 3MHz to measure a CDMA signal gives inaccurate conducted RF power level measurements. The conducted RF power level of the CDMA signal was measured with an RF power meter operating in Modulated Average Power (MAP) mode. The conducted RF power level was set to 25.1dBm. Attached is a plot of the CDMA signal, set to 25.1dBm using MAPs mode, and displayed on a spectrum analyzer using a 3MHz resolution. The spectrum analyzer shows the conducted RF power level to be approximately 2.5dB greater than the actual. Also attached are revised CDMA bandwidth plots using only 30kHz video and resolution bandwidths.

SAR:

1. The 835MHz probe conversion factors used for the SAR evaluation were 6.91 for head and 6.70 for body. The manufacturer's specified probe conversion factors for 900MHz are 6.83 for head and 6.61 for body. An evaluation of the highest SAR values for the EUT using 900MHz probe conversion factors increased the overall SAR by approximately 3.4% for the head and approximately 1.5% for the body, which is less than the uncertainty of the probe conversion factors and considerably less than the overall uncertainty of the entire system.

If you have any questions or comments concerning the above, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shawn McMillen", written over a horizontal line.

Shawn McMillen  
General Manager  
Celltech Research Inc.  
Testing & Engineering Lab

cc: Withus IT Co., Ltd.  
American TCB

hp 15:23:32 Apr 8, 2002

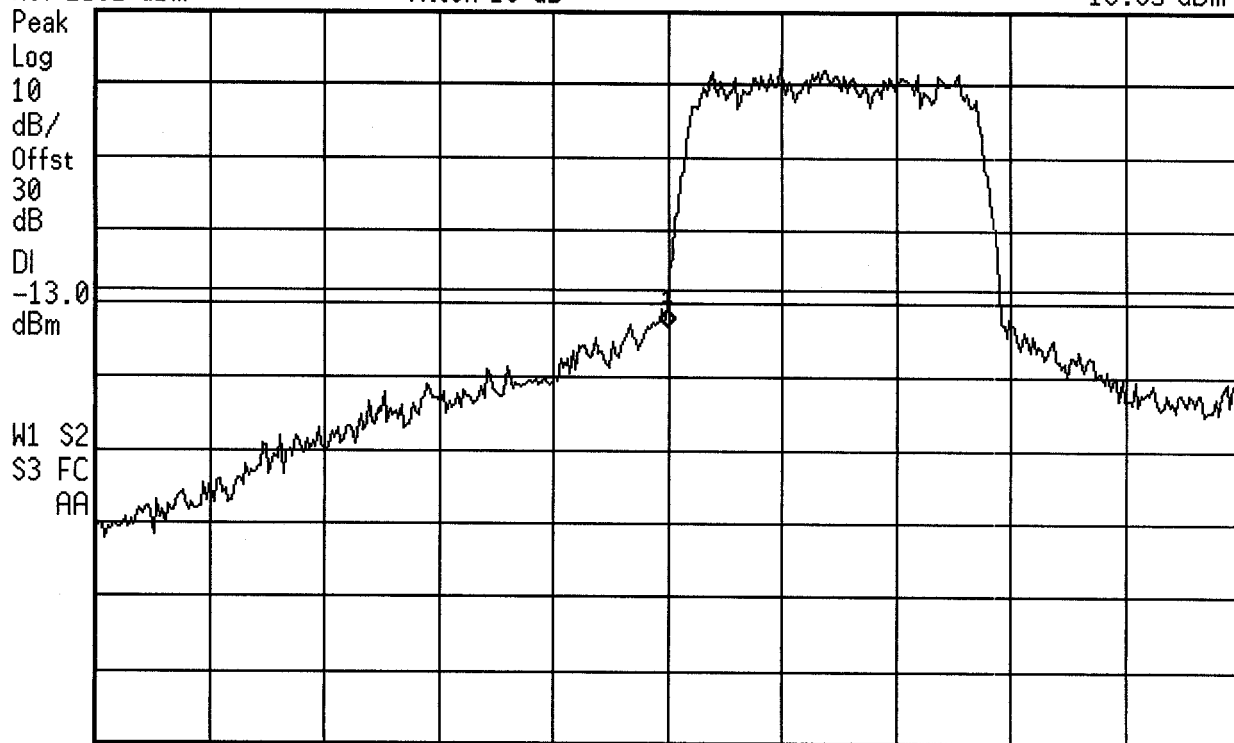
WITHUS WCE-210 BAND EDGE CDMA LOW CH

Ref 25.1 dBm

Atten 10 dB

Mkr1 824.000 MHz

-18.05 dBm



Center 824 MHz

\*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

\*Sweep 519.2 ms



15:35:49 Apr 8, 2002

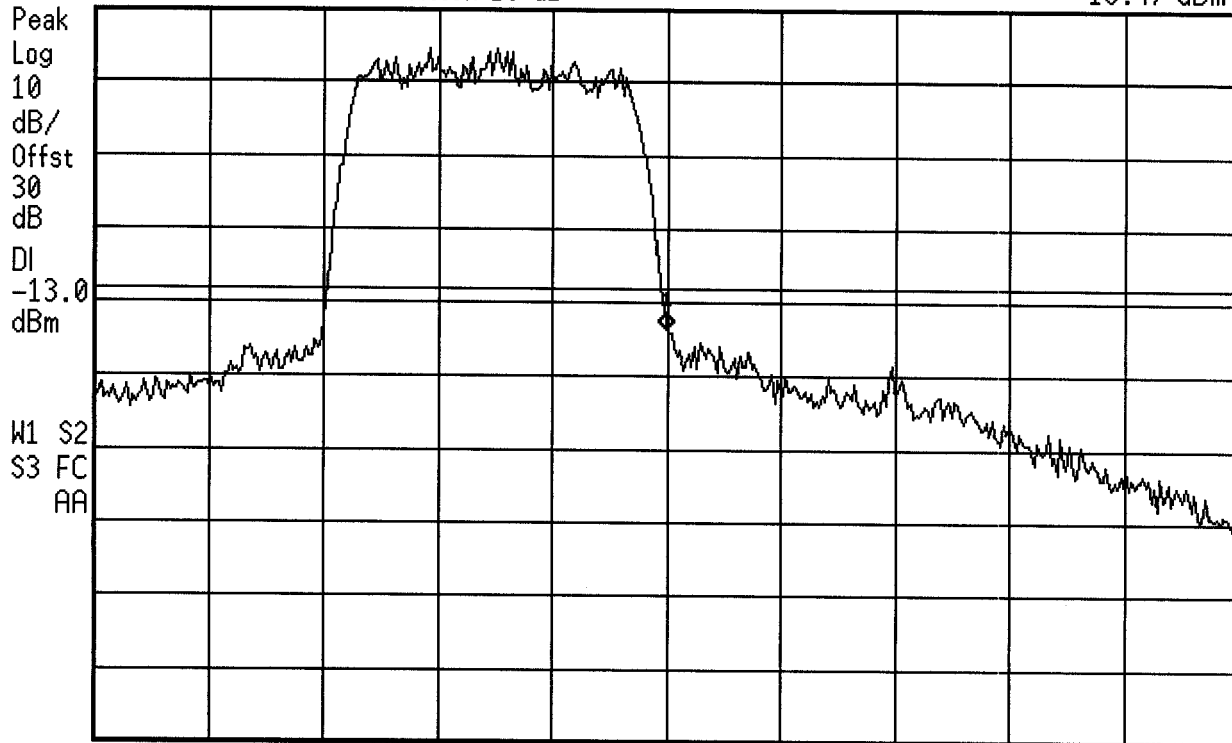
WITHUS WCE-210 BAND EDGE CDMA HIGH CH

Ref 25.1 dBm

Atten 10 dB

Mkr1 849.000 MHz

-18.47 dBm



Center 849 MHz

\*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

\*Sweep 519.2 ms



14:41:56 Apr 8, 2002

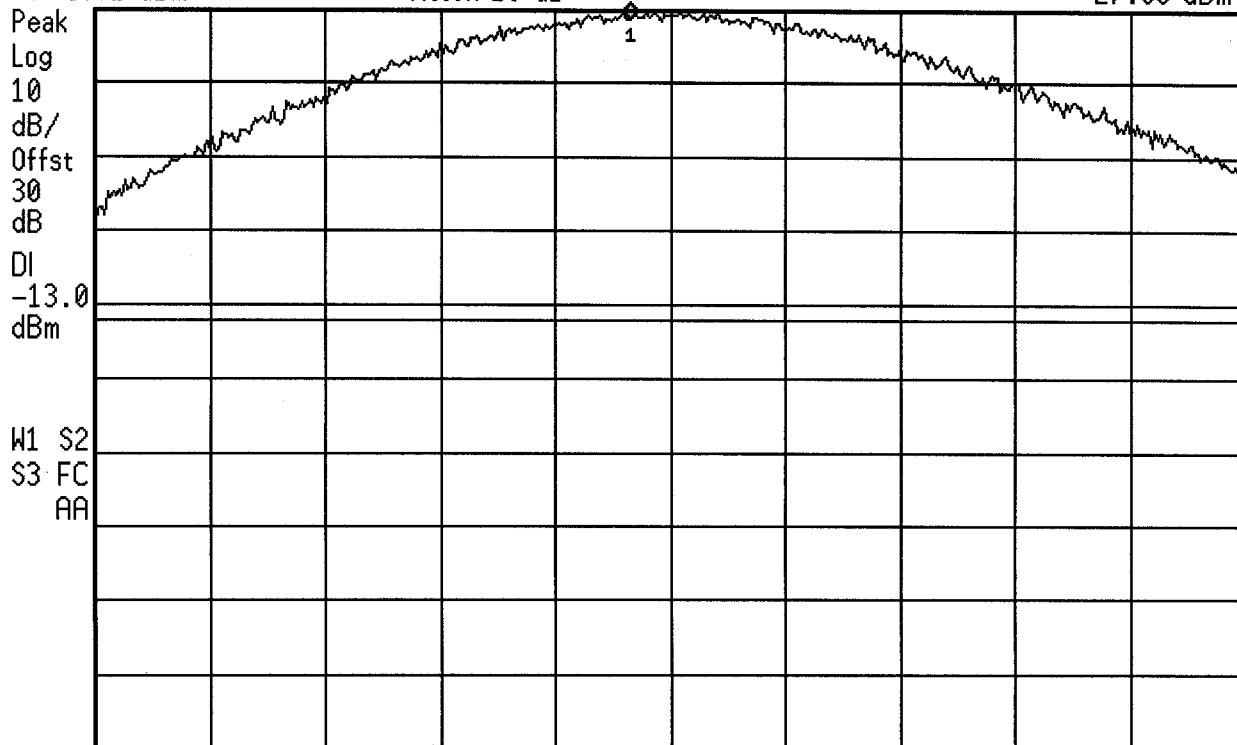
CDMA signal set to 25.1dBm using MAPS mode

Mkr1 835.55 MHz

27.68 dBm

Ref 29.1 dBm

Atten 10 dB



Center 835.9 MHz

\*Res BW 3 MHz

VBW 3 MHz

Span 10 MHz

Sweep 5 ms



WITHUS WCE-210 CH 1013

Ref 25.1 dBm

Atten 10 dB

## Peak

Log

10

dB/

Offst  
2030  
4B

QD  
D

D.

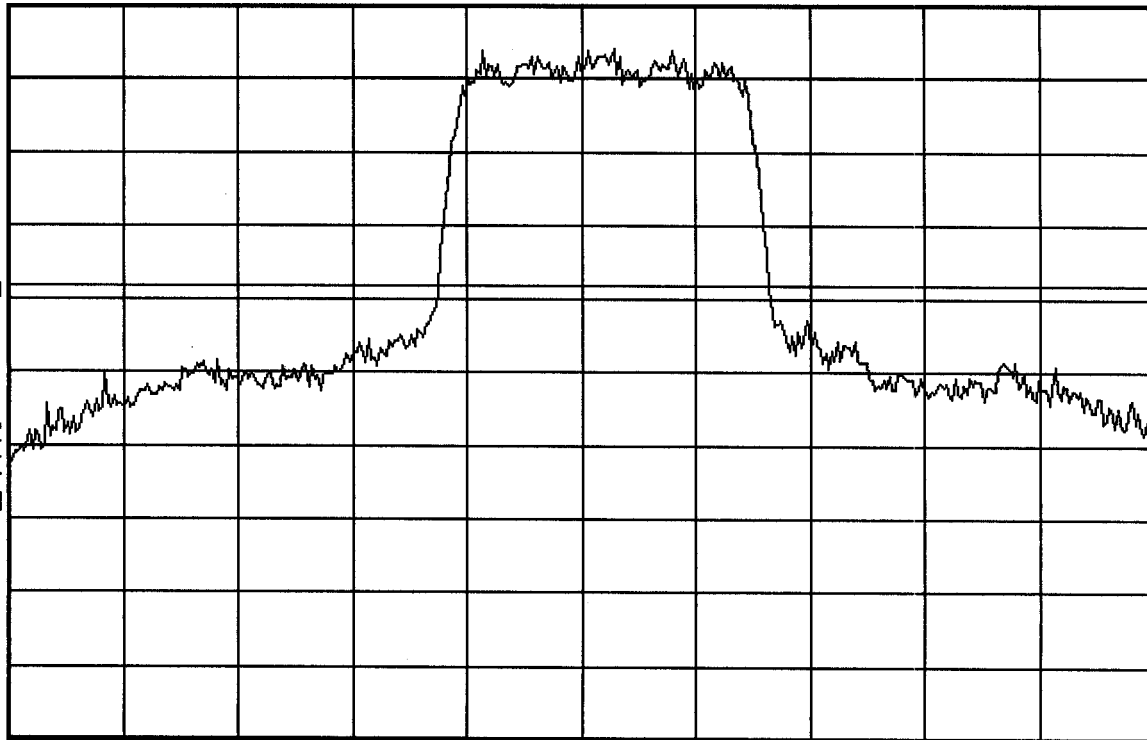
-15.0  
dBm

QDIII

W1 S2

S3 FC

AA



Center 824.6 MHz

```
#Res BW 30 kHz
```

VBW 30 kHz

Span 5 MHz

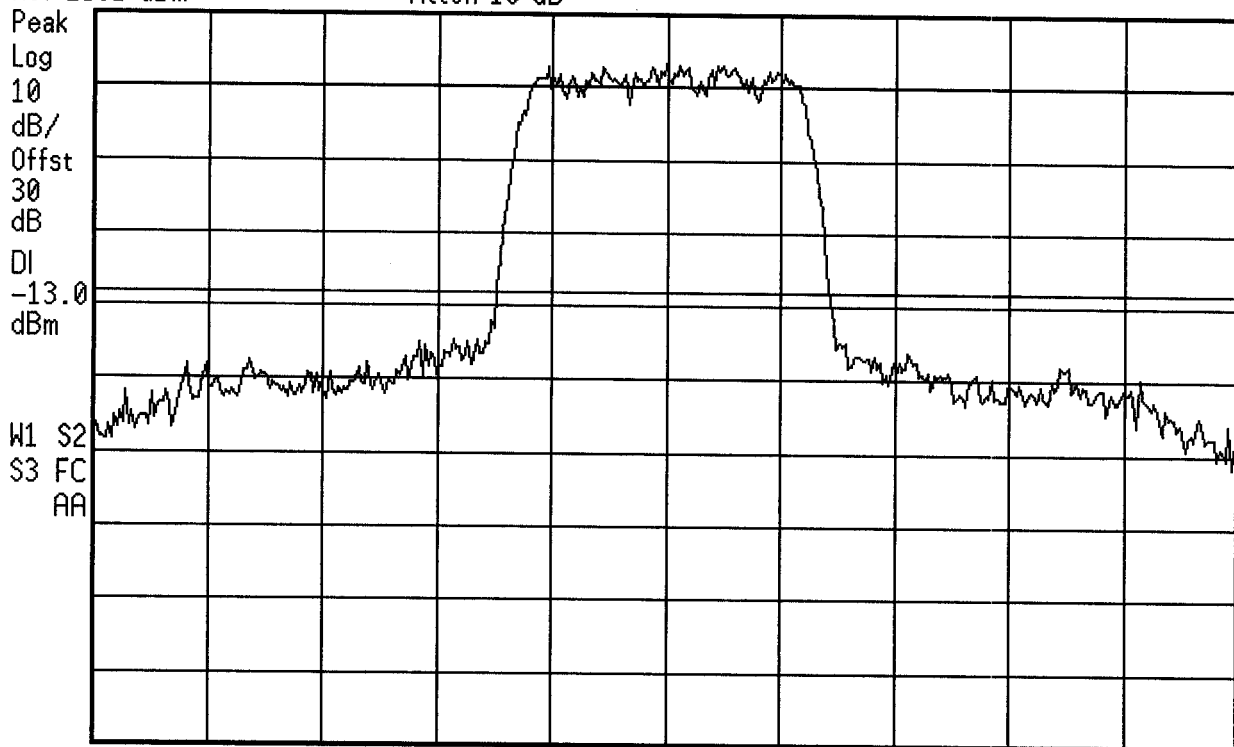
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hp 14:57:41 Apr 8, 2002

WITHUS WCE-210 CH 363

Ref 25.1 dBm

Atten 10 dB



Center 835.9 MHz

#Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

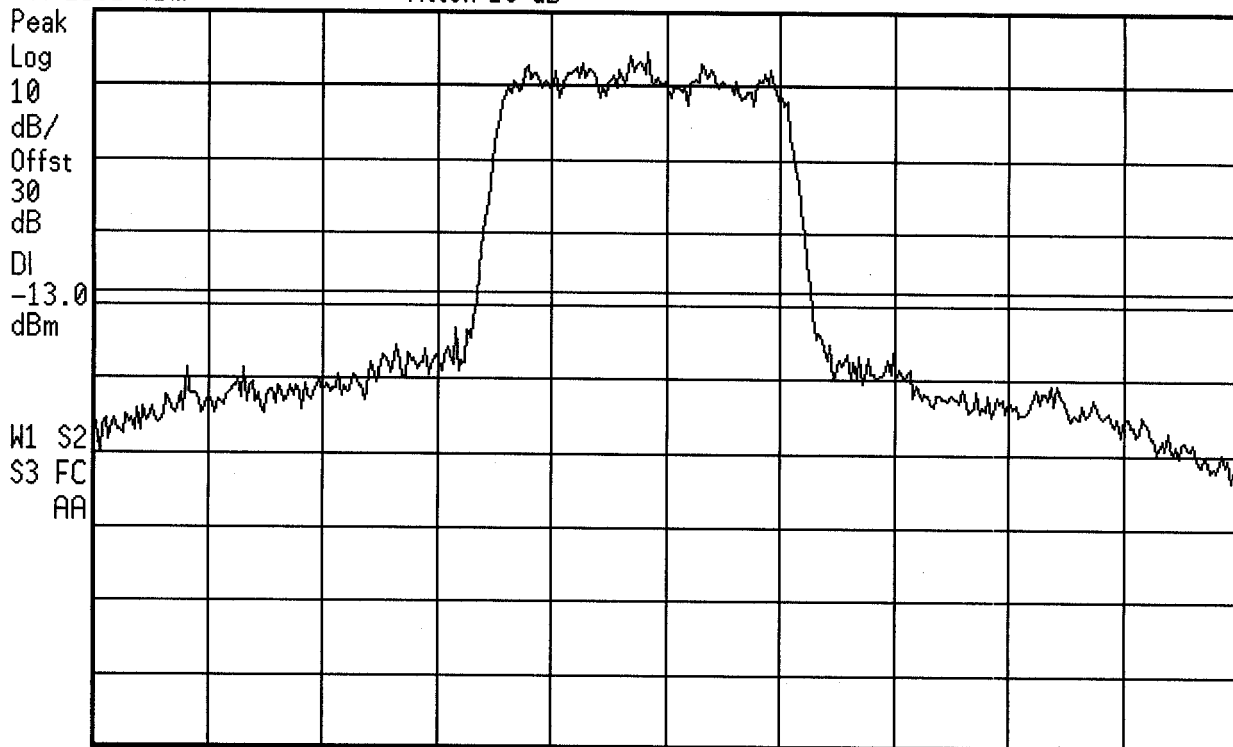
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hp 15:07:25 Apr 8, 2002

WITHUS WCE-210 CH 777

Ref 25.1 dBm

Atten 10 dB



Center 848.4 MHz

\*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

\*Sweep 519.2 ms