

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:

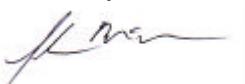
1. Attached are the remeasured band edge plots showing compliance with the band edge requirements for CDMA mode.
2. Using a spectrum analyzer with video and resolution bandwidths of 3MHz to measure a CDMA signal gives inaccurate conducted RF power level measurements. The conducted RF power level of the 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,



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

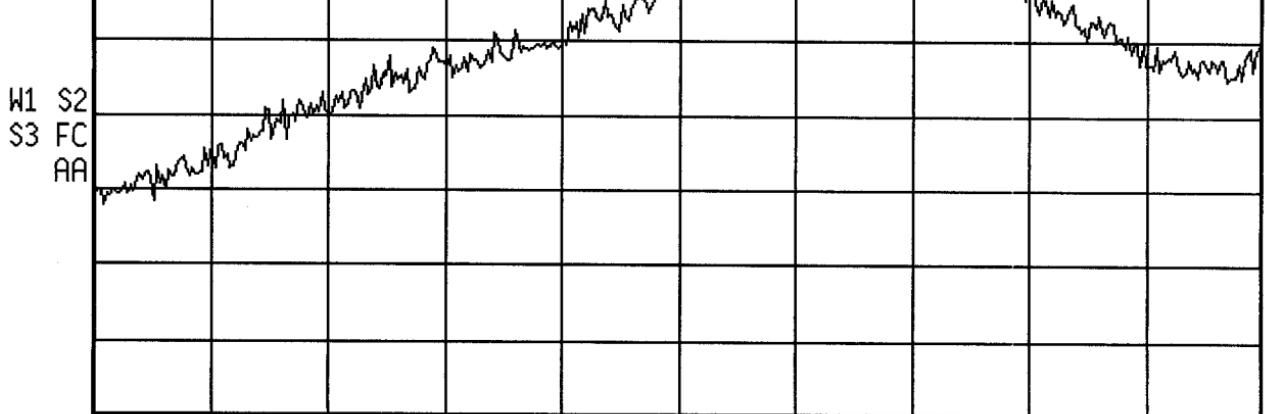
cc: Withus IT Co., Ltd.
American TCB

 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

Peak
Log
10
dB/
Offst
30
dB
DI
-13.
dBm



Center 824 MHz
*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz
*Sweep 519.2 ms

hp 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

Peak

Log

10

dB/

Offst

30

dB

DI

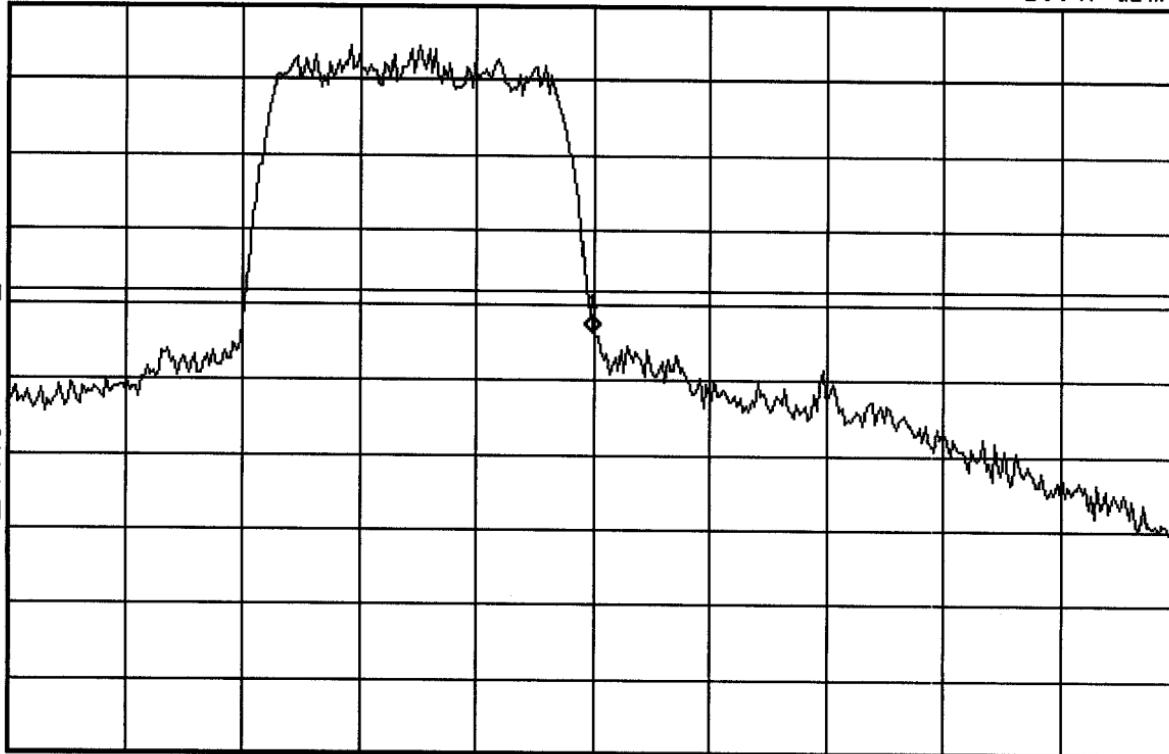
-13.0

dBm

W1 S2

S3 FC

AA



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

Peak Log

10 dB/

Offset 30 dB

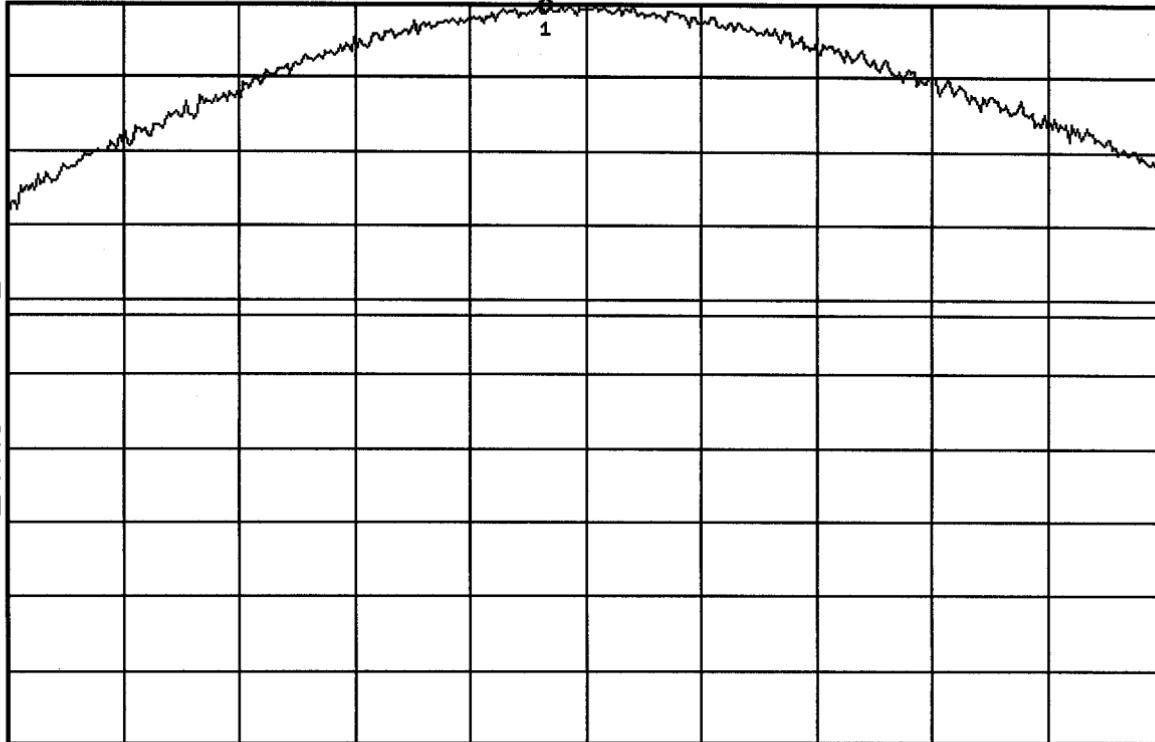
DI -13.0 dBm

dBm

W1 S2
S3 FC
AA

Atten 10 dB

1

Center 835.9 MHz
#Res BW 3 MHz

VBW 3 MHz

Span 10 MHz
Sweep 5 ms

hp 15:03:09 Apr 8, 2002
WITHUS WCE-210 CH 1013
Ref 25.1 dBm Atten 10 dB

Peak

Log

10
dB/
Offst

30
dB

DI

-13.0
dBm

W1 S2

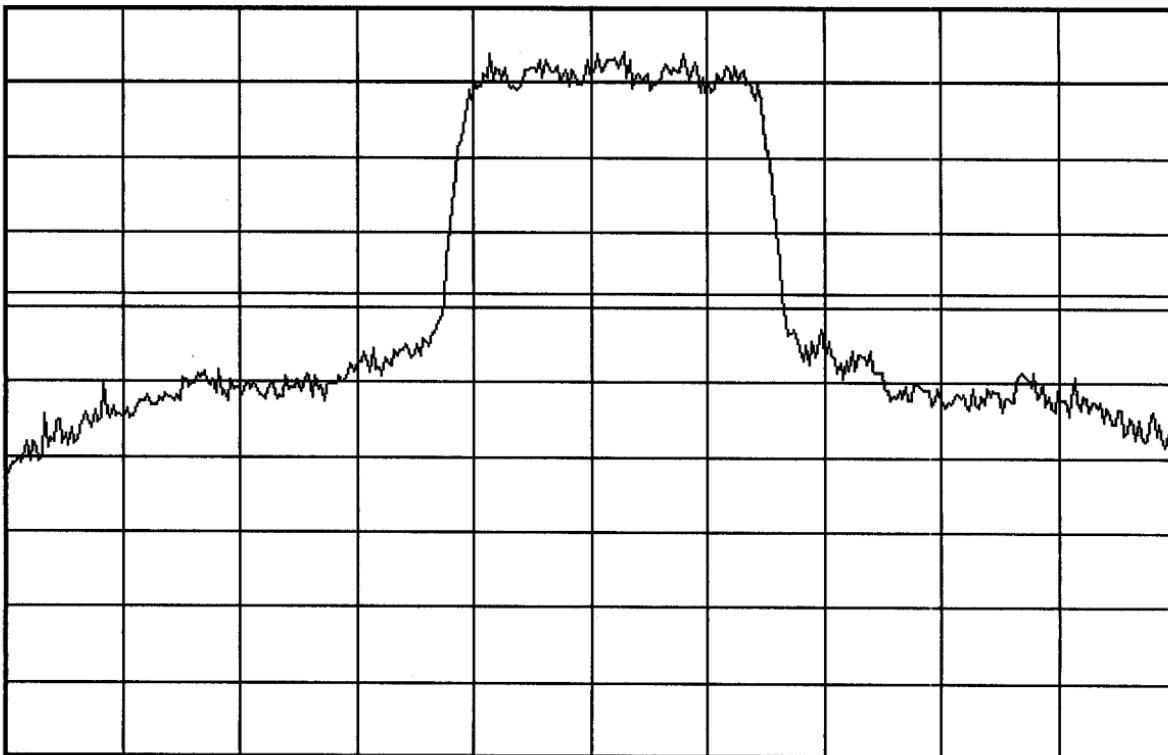
S3 FC

AA

Center 824.6 MHz
#Res BW 30 kHz

VBW 30 kHz

Span 5 MHz
#Sweep 519.2 ms



hp 14:57:41 Apr 8, 2002

WITHUS WCE-210 CH 363

Ref 25.1 dBm

Atten 10 dB

Peak

Log

10

dB/

0ffst

30

dB

DI

-13.0

dBm

W1 S2

S3 FC

AA



Center 835.9 MHz

*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

#Sweep 519.2 ms

hp 15:07:25 Apr 8, 2002

WITHUS WCE-210 CH 777

Ref 25.1 dBm

Atten 10 dB

Peak

Log

10

dB/

Offst

30

dB

DI

-13.0

dBm

W1 S2

S3 FC

AA

Center 848.4 MHz

*Res BW 30 kHz

VBW 30 kHz

Span 5 MHz

*Sweep 519.2 ms

