



## Request for Additional Information for EMC Certification

<b>Company:</b>	ZTE Corporation	<b>Composite Device:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
<b>MT#:</b>	25113	<b>FCC Direct Filing:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
		<b>Permit But Ask:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
<b>FCC ID:</b>	Q78-K3520-Z	<b>FCC Rule Part:</b>	22/24 (15B as a DoC)	
<b>UPN:</b>	N/A	<b>RSS Standard:</b>	N/A	
<b>FRN:</b>		<b>Class II PC/Reassessment:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>

Dear Cai Cai,

Thank you for your application. In order for us to process your approval, the following must be addressed. Please provide a response in a timely manner to avoid delays or dismissals.

### Technical Review:

1. There is no Tune-Up Procedure
2. The SAR report is missing the following:

#### Tissue liquid dielectric properties

-Composition, ingredients, and amounts for tissue liquid listed

#### Coarse-scan to find SAR peaks

-descriptions of coarse area scan procedures, including grid size, area shape and size

-descriptions of interpolation procedures used to locate peak SARs at a finer spatial resolution

#### One-gram averaged SAR

-descriptions of high-resolution cube volume or "zoom" scan procedures used for local scan; list measurement and interpolation resolutions

-descriptions of extrapolation procedures used to estimate SAR values adjacent to phantom surface (unreachable due to probe case and boundary effects)

-descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid

-description of averaging (integration) procedures to get 1-g SAR from final interpolated grid

3. It appears the tests were not carried out with the required separation. KDB 447498 v03r01 requirement:

2(b)(i)(1) Devices that can be connected to a host through a cable must be tested with the device positioned in all applicable orientations against the flat phantom.

NOTE11:

11 A separation distance  $\leq 0.5$  cm is required for USB-dongle transmitters. Contact the FCC Laboratory concerning requirements for other device form factors and interfaces.

4. Please see the attached SAR information provided by the FCC.



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Following are excerpts that apply to this device. You will need to do more SAR measurements to include measurements in different orientations, separation  $\leq 0.5$  cm, and following the procedure of KDB447498 2(b)(ii).

**i)The antenna(s) and radiating structures must be tested for each host platform and device configuration according to the minimum separation distance expected for all applicable operations.**

**(1)Devices that can be connected to a host through a cable must be tested with the device positioned in all applicable orientations against the flat phantom. Note 11**

**Note 11 A separation distance  $\leq 0.5$  cm is required for USB-dongle transmitters. Contact the FCC Laboratory concerning requirements for other device form factors and interfaces.**

**ii)The test configuration with the highest 1-g SAR for each host platform and device configuration, evaluated in items 2) a) and 2) b), must be used to determine if additional SAR evaluation is required due to enhanced energy coupling at increased separation distances.**

**(1) The probe tip is positioned at the peak SAR location determined in item 2) b) ii), at a distance of one half the probe tip diameter from the phantom surface. With the probe fixed at this location, the device is moved away from the phantom in 5 mm increments from the initial touching or minimum separation position. A single point SAR is measured for each of these device positions until the SAR is less than 50% of that measured at the initial position.**

**(2)When the device position in item 2) b) ii) (1) with the highest point SAR is  $> 25\%$  of that measured at the initial position, a complete 1-g SAR evaluation is required for this configuration.**

If you have any questions or concerns, please contact us.

Thank you!

Regards,

**Jenn Warnell**

TCB Administrator/Documentation

**MET Laboratories, Inc.**

Phone: 410-949-1877

Fax: 410-354-3313

[www.metlabs.com](http://www.metlabs.com)

Admin Review By: Jenn Warnell

Technical Review By: Tim Dwyer

*Please note that partial responses increase processing time and should not be submitted. The items indicated above must be provided before processing can continue on the above referenced application. Failure to provide the requested information in a timely manner may result in application dismissal.*

## Jenn Warnell

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**From:** Cai, Cai (Shanghai) [Cai.Cai@sgs.com]  
**Sent:** Tuesday, August 19, 2008 3:12 AM  
**To:** Jenn Warnell  
**Cc:** Jennifer Sanchez  
**Subject:** RE: EMC25113 - FCC TCB for ZTE Corporation FCC ID: Q78-K3520-Z  
**Importance:** High  
**Attachments:** EH-2008-50039 \_Part 22H+24E\_SGS上海.pdf; SGS-SAR-FCC-GSM11052957-2-K3520-Z.pdf; K3520-Z+\_Tune up Procedure.PDF

Dear all

Please find the updated SAR report of K3520-Z we have re-tested according to the new requirements. FYI  
Also the turn-up procedure is attached. FYI  
For RF report, on page6, the description of K3520-Z is not correct. We have modified.

Thanks and looking forwards to your kindly review.

*Best Regards*  
*Cai Cai*

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Mobile + 86 13774441076  
Fax + 86 21-54500149  
Email [cai.cai@sgs.com](mailto:cai.cai@sgs.com)

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**From:** Jenn Warnell [mailto:jwarnell@metlabs.com]  
**Sent:** 2008年8月7日 3:48  
**To:** Cai, Cai (Shanghai)  
**Cc:** Jenn Warnell; Jennifer Sanchez  
**Subject:** FW: EMC25113 - FCC TCB for ZTE Corporation FCC ID: Q78-K3520-Z

Hi Cai Cai,

I wanted to follow up with you regarding this issue. Please let me know if you need more time to correct your reports or if you have any questions or concerns.

Thanks,  
Jenn

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**From:** Jenn Warnell  
**Sent:** Thursday, July 31, 2008 10:23 PM  
**To:** 'Cai, Cai (Shanghai)'  
**Cc:** Jenn Warnell; Jennifer Sanchez; Angela Kekovski; 'Tim Dwyer'  
**Subject:** EMC25113 - FCC TCB for ZTE Corporation FCC ID: Q78-K3520-Z

8/19/2008



## Request for Additional Information for EMC Certification

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<b>MT#:</b>	25113	<b>FCC Direct Filing:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
		<b>Permit But Ask:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
<b>FCC ID:</b>	Q78-K3520-Z	<b>FCC Rule Part:</b>	22/24 (15B as a DoC)	
<b>UPN:</b>	N/A	<b>RSS Standard:</b>	N/A	
<b>FRN:</b>		<b>Class II PC/Reassessment:</b>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>

Dear Cai Cai,

Thank you for your application. In order for us to process your approval, the following must be addressed. Please provide a response in a timely manner to avoid delays or dismissals.

### Technical Review:

1. Since the highest SAR measurement is  $>1.2$  W/kg, the conditions of KDB 447489(2)(a) does not appear to be met. Please verify.
2. It is not clear that the measurements described in KDB 44489(2)(b) were carried out. Please verify.
3. Since the maximum SAR is  $>1.2$  W/kg and the device is intended to be connected to multiple hosts, KDB 447489(2)(c) applies. Please confirm that this information is correct.

If you have any questions or concerns, please contact us.

Thank you!

TCB Administrator  
MET Laboratories, Inc.  
[tcbinfo@metlabs.com](mailto:tcbinfo@metlabs.com)  
[www.metlabs.com](http://www.metlabs.com)

Admin Review By: Jenn Warnell  
Technical Review By: Tim Dwyer

*Please note that partial responses increase processing time and should not be submitted. The items indicated above must be provided before processing can continue on the above referenced application. Failure to provide the requested information in a timely manner may result in application dismissal.*

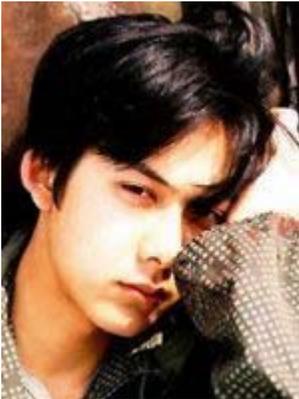
## Jenn Warnell

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**From:** Cai, Cai (Shanghai) [Cai.Cai@sgs.com]  
**Sent:** Thursday, September 04, 2008 6:20 AM  
**To:** Jenn Warnell  
**Cc:** Jennifer Sanchez  
**Subject:** RE: EMC25113 - FCC ID: Q78-K3520-Z  
**Attachments:** EH-2008-50039\_Part 22H+24E\_SGS上海.pdf; SGS-SAR-FCC-GSM11052957-2-K3520-Z update0904.pdf

Dear all  
Please find the updated RF report of K3520-Z, FYI  
On page6, the description of the sample is not correct.  
For the SAR report, we re-test it again. SAR report is enclosed. FYI  
If any question about the report, pls contact me freely.

*Best Regards*  
*Cai Cai*



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Email [cai.cai@sgs.com](mailto:cai.cai@sgs.com)

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**From:** Jenn Warnell [mailto:jwarnell@metlabs.com]  
**Sent:** 2008年8月22日 2:20  
**To:** Cai, Cai (Shanghai)  
**Cc:** Jenn Warnell; Jennifer Sanchez  
**Subject:** EMC25113 - FCC ID: Q78-K3520-Z

Hi Cai Cai,

Our technical review still have some concerns regarding the SAR test report. Please review the attached letter to address these issues.

## Jenn Warnell

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**From:** Jennifer Sanchez  
**Sent:** Friday, September 05, 2008 6:40 PM  
**To:** 'Cai, Cai (Shanghai)'  
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell; Jennifer Sanchez  
**Subject:** 25113 SGS - Request for additional information  
**Importance:** High  
**Attachments:** KDB 447498 Mobile Portable RFX 20080727 v03r02.pdf

Hi Cai Cai,

Please see our technical reviewer's comments:

The Part 22/24 report is acceptable.

For the SAR report, the new measurements have brought the device to  $< 1.2$  W/kg, which gives the possibility for compliance with KDB447498 (2)(a)(3). However (2)(a)(3) states "The most conservative exposure conditions among all host configurations within the platform must be fully tested using the procedures in item 2) b)...." The revised SAR report still does not include any indication that measurements according to (2)(b) were carried out. This was mentioned in my previous comments on 20 Aug.

Specifically, the Enhanced Energy Coupling evaluation described in (2)(b)(ii) does not appear to have been performed. It is my understanding that the test is required for all USB dongle devices that require SAR testing.

It appears that FCC has recently dismissed several dongle transmitters like this for failure to follow KDB447498 procedures.

A copy of KDB447498 v03r02 is attached.

Thanks!

**Mrs. J. Sanchez**

TCB Administrator

MET Laboratories (Santa Clara, CA)

408-207-4785 Direct

408-829-1603 Cell

[jsanchez@metlabs.com](mailto:jsanchez@metlabs.com)



Certifying the World, One Product at a Time

## Jenn Warnell

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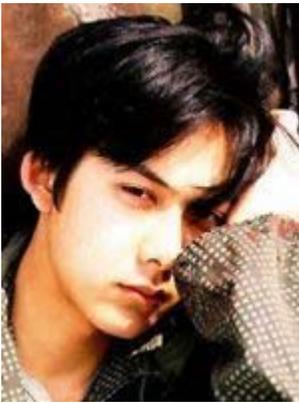
**From:** Cai, Cai (Shanghai) [Cai.Cai@sgs.com]  
**Sent:** Tuesday, September 09, 2008 5:11 AM  
**To:** Jennifer Sanchez  
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell  
**Subject:** RE: 25113 SGS - Request for additional information  
**Importance:** High  
**Attachments:** SGS-SAR-FCC-GSM11052957-2-K3520-Z update0909.pdf

Dear all

The SAR report of K3520-Z has been updated again.

On page 23, the single point SAR with highest SAR configuration is added. FYI  
Please give your kindly review and your comments are welcomed.

*Best Regards*  
*Cai Cai*



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Email [cai.cai@sgs.com](mailto:cai.cai@sgs.com)

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**From:** Jennifer Sanchez [mailto:jsanchez@metlabs.com]  
**Sent:** 2008年9月6日 6:40  
**To:** Cai, Cai (Shanghai)  
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell; Jennifer Sanchez  
**Subject:** 25113 SGS - Request for additional information  
**Importance:** High

Hi Cai Cai,

9/9/2008



## Request for Additional Information for EMC Certification

Company:	ZTE Corporation (SGS)	Composite Device:	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
MT#:	25113	FCC Direct Filing:	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
		Permit But Ask:	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
FCC ID:	Q78-K3520-Z	FCC Rule Part:	22/24	
UPN:	N/A	RSS Standard:		
FRN:		Class II PC/Reassessment:	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>

Dear Cai Cai,

Thank you for your application. In order for us to process your approval, the following must be addressed. Please provide a response in a timely manner to avoid delays or dismissals.

### Technical Review:

- According to KDB447498 (2)(b)(ii)(2), since the measurement at 10 mm (0.691 W/kg) is < 50% but > 25% of the 5mm value (1.39 W/kg) a complete 1-g SAR scan is required at 10 mm. This does not appear to have been done.
- Since the remaining measurements > 10 mm are < 25% of the initial value, complete scans are not required. In fact, since the 10 mm measurement was < 50% of the initial value, point measurements at greater distances are not necessary.
- The overall criteria is that all 1-g SAR measurements (including enhanced energy coupling measurements) must be < 1.2 W/kg to qualify for multiple host use.

If you have any questions or concerns, please contact us.

Thank you!

Jennifer Sanchez  
TCB Administrator  
MET Laboratories, Inc.  
[tcbinfo@metlabs.com](mailto:tcbinfo@metlabs.com)  
[www.metlabs.com](http://www.metlabs.com)

Admin Review By: Jenn Warnell  
Technical Review By: Tim Dwyer

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## Jenn Warnell

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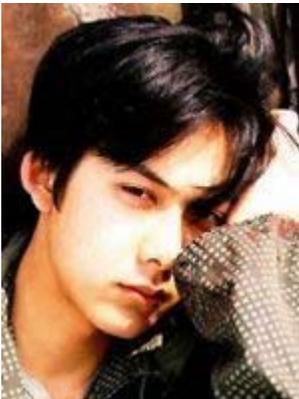
**From:** Cai, Cai (Shanghai) [Cai.Cai@sgs.com]  
**Sent:** Wednesday, September 10, 2008 10:01 PM  
**To:** Jennifer Sanchez  
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell  
**Subject:** RE: 25113 SGS - 4th Request for technical information  
**Attachments:** SGS-SAR-FCC-GSM11052957-2-K3520-Z update0904.pdf

Dear all  
Please find the updated SAR report of K3520-Z, FYI

Add full SAR test in page 57

Thanks.

*Best Regards*  
*Cai Cai*



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Fax + 86 21-54500149  
Email [cai.cai@sgs.com](mailto:cai.cai@sgs.com)

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**From:** Jennifer Sanchez [mailto:jsanchez@metlabs.com]  
**Sent:** 2008年9月10日 8:26  
**To:** Cai, Cai (Shanghai)  
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell; Jennifer Sanchez  
**Subject:** 25113 SGS - 4th Request for technical information  
**Importance:** High

Hi Cai Cai,

9/11/2008