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Subject:	www.AmericanTCB.com ATCB007162 | Q78-ZTEA36GPLUS | | | Q78-ZTEA36GPLUS_ATCB007162

Regarding www.AmericanTCB.com application:
ATCB ID: ATCB007162
FCC ID: Q78-ZTEA36GPLUS
IC:
TCF:
Account name: tmcchina

Please see comments. Please note that most of these are the same as the comments from the other application ATCB007161.

1 While a block diagram is not mandatory for a licensed device application, when provided, the block diagram should be consistent with the requirements of 2.1033. Please note these requirements and provide a block diagram in accordance with this rule part (i.e. a block diagram is to show the signal paths within the block. All the diagram provided shows is the antenna path and the crystals; it does not provide any information about what the "PMB7880" (which is the actual device) contains.

2 Please note that technical spec sheets are not operational descriptions. While they may contain information such as frequency of operation, standard used, size etc, they do not contain the information specifically stated as being required under 2.1033(c)(10) "a description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power." Please provide an operational description in accordance with 2.1033 as stated.

3 Please note that the "tune up" procedure provided is not a tune up procedure but is only a listing of target values. Please note that a tune up procedure is the procedure used by the manufacturer to achieve these target values. Please provide the actual tune up procedures used at the factory to achieve the values stated.

4 Under section 9.2 page 22 of the SAR report you appear to be using an incorrect dipole target value. The calibration sheet for the 835MHz dipole appears to say the permittivity is 40.9 and resistivity of 0.89, but the SAR report table shows a permittivity of 41.21 (this appears to be from the dielectric performance test). Please use the correct dipole values as required by the FCC for verification results. Please also check the 1900MHz data as well and mearure/re-measure as needed using the proper dipole factors.

5 Please note that all documentation must agree. Please note that on page 5 of the manual it says the highest SAR values measured were 1.45 W/kg head and 0.723W/kg body. This does not agree with the SAR report. Please correct the manual to agree with the actual results of the SAR measurements.

6 Please explain why a European Standard (EN300 910 V8.5.1) is referenced on page 16 of the part 22-24 report. Please note this reference is not correct as it deals with the EU bands and not the US bands of operation. Please correct and make proper references to standards and methods used.

7 Under section B1.3.2 of the part 22-24 report you state “The EUT is then put into pulse mode at its maximum power level.” Please explain what “pulse mode” is in relation to this test and please explain why the EUT was placed in pulse mode and not continuously transmitting as required. Also, please justify “Gated Mode” and why it was used. What is “Gated Mode” in relation to this test (please note ‘pulse mode’ and ‘gated mode’ are issues that the operational description should clearly and unambiguously explain). Please explain any variation from the specific test methods of TIA603 and explain why they apply to this device.

8 Please note that all you show in the ERP/EIRP tables is the final results. This is not acceptable. Please show the actual EUT measurement values and correction factors used to determine the final results (i.e. show the value of EUT measurement and the value of the reference path loss associated with the measurement). Please pay strict attention to the requirements of TIA 603 and how measurements are made.

9 Please note that you must show compliance to the erp/eirp radiated spurious emissions using the antenna substitution method. While a precalibrated field may be used, you must still show how the final results were obtained. Please note your report section B2.3 on page 23 of the report states “The spurious emissions were done with different settings, using the relevant pre-amplifiers for the relevant frequency ranges. This is the reason that the graphs show different noise levels.” Please note that this is not acceptable. Please show erp/eirp compliance by including ALL relevant data including the factors associated with any pre-amplifiers and any associated path loss. Please provide the formula used and the relevant data used for at least the 6 highest readings within 20dB of the limit even if noise floor. Please show the appropriate values as stated in section B.2.1 of the report in the data.

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