# Request for Additional Information for EMC Certification

| | | | | |
|---|---|---|---|---|
| **Company:** | ZTE Corporation | **Composite Device:** | **Yes:** ☐ | **No:** ☒ |
| **MT#:** | 81445 | **FCC Direct Filing:** | **Yes:** ☐ | **No:** ☒ |
| | | **Permit But Ask:** | **Yes:** ☐ | **No:** ☒ |
| **FCC ID:** | Q78-ZXMBW-E9200 | **FCC Rule Part:** | 27 | |
| **UPN:** | N/A | **RSS Standard:** | - | |
| **FRN:** | | **Class II PC/Reassessment:** | **Yes:** ☐ | **No:** ☒ |

March 3, 2009

Dear Wei,

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. The internal pictures do not show the PC boards in side the unit. All PCBs need to be removed and then pictures taken.
2. FYI…This device appears to fall under Broadband Radio Service (BRS) in part 27 of the FCC rules. Only certain frequencies in the designated band maybe used for a BRS device during licensing (no action required).
3. The user's manual states that the unit may operate in either 5 or 10 MHz OBW. The test report must include data for both settings. Also, it appears that the unit has several modulation schemes. Please list the available modulations for this device. If the device has OFDM then all testing can be done with this modulation at 6 Mbps but must show data for both 5 and 10 MHz bandwidths. If the device does not have OFDM but only QPSK and QAM, then all testing can be done with QPSK modulation and 5/10 MHz bandwidths.
4. It appears that modulation characteristics are not required for your device. Please remove this section.
5. FYI…The plots showing the conducted power for channel 2593 MHz is shown with a 30 kHz VBW. Ideally, the VBW needs to be greater than the RBW (no action required).
6. Some plots show a duty cycle on them where else others do not. Please remove this duty cycle when testing.
7. The power limit is listed in terms of EIRP. The power from the unit must be expressed as an EIRP using the highest gain antenna used with the device and then compared to the limit.
8. Form 731 states that this is a class A device. It should be changed to TBC (Licensed Broadcast Station Transmitter). Also, the power listed on form 731 is wrong. The conducted power stated in the test report is 0.387 Watts.
9. No FCC declarations were found in the user manual.
10. The MPE listed in the test report was calculated as being 0.08 mW/cm^2. This is not the correct MPE, from the numerical values given. The equation used is correct; however, the calculation is incorrect. Please provide results that satisfy the MPE limits accurately. Also, since the feed point of the antennas appear to be less than 20 cm apart co-location needs to be addressed in the MPE calculation.

11. On page 21 of the radio test report, the EMI test receiver, cable sets and the signal generator are reported as being out of calibration. Please confirm that this test was performed using calibrated instruments.
12. FCC Rule Part 2.1033.b.5 states that the applicant shall provide the following: "A block diagram showing the frequency of all oscillators in the device. The signal path and frequency shall be indicated at each block. The tuning range(s) and intermediate frequency(ies) shall be indicated at each block" A block diagram with all oscillators in the device, the frequency at each block, and the tuning range and IF frequencies could not be found. Please provide this information.
13. The conducted spurs at the antenna terminals should have been performed with a 1 MHz RBW. Please perform this testing using 1 MHz RBW and up to the 10th harmonic of the fundamental.
14. The VBW of some of the plots for the occupied bandwidth section are less than the RBW. Please retake these plots.
15. Page 7 of the radio test report states that the external attenuation used was 10 dB but the test procedure states 20 dB. Also, it appears that the cable loss was not measured. The test procedures state that the cable loss is "about" 3 dB. The cable loss needs to be a measured quantity.
16. It appears the band edge measurements were not properly performed. Compliance with these rules is based on the use of measurement instrumentation employing a resolution bandwidth of 1 MHz or greater. However, in the 1 MHz bands immediately outside and adjacent to the frequency block a resolution bandwidth of at least one percent of the emission bandwidth of the fundamental emission of the transmitter may be employed. A narrower resolution bandwidth is permitted in all cases to improve measurement accuracy provided the measured power is integrated over the full required measurement bandwidth (i.e. 1 MHz or 1 percent of emission bandwidth, as specified). The emission bandwidth is defined as the width of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, outside of which all emissions are attenuated at least 26 dB below the transmitter power.
17. Please indicate to which voltage and frequency the conducted emissions voltage were performed to in the part 15B test report
18. The part 15B test report does not have any information on calibration dates of equipment. Please provide this information.

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

Thank you!

Jennifer Sanchez
TCB Administrator
MET Laboratories, Inc.
tcbinfo@metlabs.com

Admin Review By: Jennifer Sanchez
Technical Review By: Dusmantha Tennakoon

*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.*

## Jennifer Sanchez

**From:** wei.bin3@zte.com.cn
**Sent:** Tuesday, March 03, 2009 10:52 PM
**To:** Jennifer Sanchez
**Cc:** Jennifer Sanchez; Jenn Warnell; Stanford Liao
**Subject:** 答复: 81445 ZTE - TCB Request for information for the FCC ID: Q78-ZXMBW-E9200
**Attachments:** Attached file 1 photos of mainboard.pdf; attached file 2 Block diagram.pdf; Q78-ZXMBW E9200_Test Report.pdf; Part 15 test report(updated).pdf

Jennfer,
Thanks for your review,and we will correct them as below:
1,The additional photos can see in attached file 1;
2,I don't know what is the matter?
3,our equipment can just operate in 10MHz OBW,and all testing are done with QPSK modulation.
4,We correct it in the updated test report(PS:Does it can touch the test result?)
5,We test the equipment with the highest gain antenna used;
6,The 0.5W is the max conduct power for declare;
7,we correct the user mannual;
8,correct in the updated test report;
9,correct in the updated test report;
10,updated the block diagram as attached file2 ,and no IF frequency used in our peoduct;
11,For RBW seting ,for difference frequency ranges we can use difference RBW, RBW lower ,the test result will be more accurate;
12,For RBW and VBW seting ,it can not effect the test result;for this project,can you pass for this time;
13, the serial number of EUT is 210000002132,which updated in the test report;
14,we use two attenuations during the test .10dB just for single;
15,we find the peak value out of the band;
16,17,we have updated all in the updated report;

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## Jennifer Sanchez

**From:** Jennifer Sanchez
**Sent:** Thursday, March 05, 2009 2:54 PM
**To:** 'wei.bin3@zte.com.cn'
**Cc:** Jennifer Sanchez; Jenn Warnell; Stanford Liao
**Subject:** 81445 ZTE - 2nd Request for additional information
**Importance:** High

Hi Wei,

The technical reviewer has comments regarding the response provided. It appears your response does not match with the reviewer's request. Our reviewer has provided a response in regards to the response from you and the issues outstanding.

**Issues from RT sent March 3, 2009:**

**Issue # 3 –** *The user's manual states that the unit may operate in either 5 or 10 MHz OBW. The test report must include data for both settings. Also, it appears that the unit has several modulation schemes. Please list the available modulations for this device. If the device has OFDM then all testing can be done with this modulation at 6 Mbps but must show data for both 5 and 10 MHz bandwidths. If the device does not have OFDM but only QPSK and QAM, then all testing can be done with QPSK modulation and 5/10 MHz bandwidths.*
**Reviewers Comments:** Page 8 of the user manual states that the device is user configurable for 5 or 10 MHz bandwidths. The test report only shows compliance for 10 MHz bandwidth. ZTE replied saying that only 10 MHz was usable for the device. If that is the case then the user manual needs to be updated to only reference 10 MHz.

**Issue # 4 –** *It appears that modulation characteristics are not required for your device. Please remove this section.*
**Reviewers Comments:** Modulation characteristics are still in the test report although the response from ZTE appears to be that they removed it.

**Issue # 6 –** *Some plots show a duty cycle on them where else others do not. Please remove this duty cycle when testing.*
**Reviewers Comments:** The question about the duty cycle has not been answered. Measurements made with a duty cycle will not yield the right results for some measurements.

**Issue # 7 –** *The power limit is listed in terms of EIRP. The power from the unit must be expressed as an EIRP using the highest gain antenna used with the device and then compared to the limit.*
**Reviewers Comments:** This has not been addressed in the updated test report. Measuring the conducted power is ok, but then one must add the highest gain antenna that is going to be used for the device to show compliance with the EIRP limit under 27.50(h)(1). The limit is not 2000 Watts as stated in the test report.

**Issue # 8 –** *Form 731 states that this is a class A device. It should be changed to TBC (Licensed Broadcast Station Transmitter). Also, the power listed on form 731 is wrong. The conducted power stated in the test report is 0.387 Watts.*
**Reviewers Comments:** It appears that form 731 was not updated. Please clarify discrepancy with output power.

**Issue # 9 –** *No FCC declarations were found in the user manual.*
**Reviewers Comments:** I don't see the updated manual in the attachments that were sent.

**Issue # 10 –** *The MPE listed in the test report was calculated as being 0.08 mW/cm^2. This is not the correct MPE, from the numerical values given. The equation used is correct; however, the calculation is incorrect. Please provide results that satisfy the MPE limits accurately. Also, since the feed point of the antennas appear to be less than 20 cm apart co-location needs to be addressed in the MPE calculation.*
**Reviewers Comments:** MPE has not been up dated yet.

**Issue # 13 –** *The conducted spurs at the antenna terminals should have been performed with a 1 MHz RBW. Please*

*perform this testing using 1 MHz RBW and up to the 10th harmonic of the fundamental.*
**Reviewers Comments:** This appears to not have been addressed.

**Issue # 14 –** *The VBW of some of the plots for the occupied bandwidth section are less than the RBW. Please retake these plots.*
**Reviewers Comments:** OK, for future filings please make sure VBW>RBW.

**Issue # 16 –** *It appears the band edge measurements were not properly performed. Compliance with these rules is based on the use of measurement instrumentation employing a resolution bandwidth of 1 MHz or greater. However, in the 1 MHz bands immediately outside and adjacent to the frequency block a resolution bandwidth of at least one percent of the emission bandwidth of the fundamental emission of the transmitter may be employed. A narrower resolution bandwidth is permitted in all cases to improve measurement accuracy provided the measured power is integrated over the full required measurement bandwidth (i.e. 1 MHz or 1 percent of emission bandwidth, as specified). The emission bandwidth is defined as the width of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, outside of which all emissions are attenuated at least 26 dB below the transmitter power.*
**Reviewers Comments:** Has not been addressed. If you are only finding the peak at the band edges it must be done with a 1 MHz RBW. You may use a lower bandwidth but you must use integration methods. Please see my explanation in the original RT.

**Issue # 17 –** *Please indicate to which voltage and frequency the conducted emissions voltage were performed to in the part 15B test report.*
**Reviewers Comments:** Could not find in the test report where you have indicated this information. Can you please provide the page number where this can be found?

Please note the test report still list the FCC ID as Q78-ZXMBW E9200, there should not be a space in the FCC ID. It is recommended the ID be corrected in the test report.

If you have any questions, please let me know.

Thanks!
**J. Sanchez**
TCB Administrator
**MET Laboratories, Santa Clara CA**
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408-829-1603 Cell
jsanchez@metlabs.com

**Jennifer Sanchez**

**From:** wei.bin3@zte.com.cn
**Sent:** Thursday, March 05, 2009 6:42 PM
**To:** Jennifer Sanchez
**Cc:** Jennifer Sanchez; Jenn Warnell; Stanford Liao
**Subject:** 答复: 81445 ZTE - 2nd Request for additional information

The technical reviewer has comments regarding the response provided. It appears your response does not match with the reviewer's request. Our reviewer has provided a response in regards to the response from you and the issues outstanding.

**Issues from RT sent March 3, 2009:**

**Issue # 3 –** *The user's manual states that the unit may operate in either 5 or 10 MHz OBW. The test report must include data for both settings. Also, it appears that the unit has several modulation schemes. Please list the available modulations for this device. If the device has OFDM then all testing can be done with this modulation at 6 Mbps but must show data for both 5 and 10 MHz bandwidths. If the device does not have OFDM but only QPSK and QAM, then all testing can be done with QPSK modulation and 5/10 MHz bandwidths.*
**Reviewers Comments:** Page 8 of the user manual states that the device is user configurable for 5 or 10 MHz bandwidths. The test report only shows compliance for 10 MHz bandwidth. ZTE replied saying that only 10 MHz was usable for the device. If that is the case then the user manual needs to be updated to only reference 10 MHz.
updated the test report ,10 M Hz will remain;

**Issue # 4 –** *It appears that modulation characteristics are not required for your device. Please remove this section.*
**Reviewers Comments:** Modulation characteristics are still in the test report although the response from ZTE appears to be that they removed it.
I will remove this section.

**Issue # 6 –** *Some plots show a duty cycle on them where else others do not. Please remove this duty cycle when testing.*
**Reviewers Comments:** The question about the duty cycle has not been answered. Measurements made with a duty cycle will not yield the right results for some measurements.
I don't know what you mean, we test the equipment according to the standard of IEEE 802.16e and IEEE 802.16;

**Issue # 7 –** *The power limit is listed in terms of EIRP. The power from the unit must be expressed as an EIRP using the highest gain antenna used with the device and then compared to the limit.*
**Reviewers Comments:** This has not been addressed in the updated test report. Measuring the conducted power is ok, but then one must add the highest gain antenna that is going to be used for the device to show compliance with the EIRP limit under 27.50(h)(1). The limit is not 2000 Watts as stated in the test report.
The max output power is 26.7dBm,antenna gain is about 2.2 dBi ,so EIRP will be 29dBm.

**Issue # 8 –** *Form 731 states that this is a class A device. It should be changed to TBC (Licensed Broadcast Station Transmitter). Also, the power listed on form 731 is wrong. The conducted power stated in the test report is 0.387 Watts.*
**Reviewers Comments:** It appears that form 731 was not updated. Please clarify discrepancy with output power.
yes, the measured max output power is 0.387W,but the max output power for disign is 0.5W. so we think if we use 0.5W ,it's will be more proper.

**Issue # 9 –** *No FCC declarations were found in the user manual.*
**Reviewers Comments:** I don't see the updated manual in the attachments that were sent.
later ,I will send you the updated user manual;

**Issue # 10 –** *The MPE listed in the test report was calculated as being 0.08 mW/cm^2. This is not the correct MPE, from the numerical values given. The equation used is correct; however, the calculation is incorrect. Please provide results that satisfy the MPE limits accurately. Also, since the feed point of the antennas appear to be less than 20 cm apart co-location needs to be addressed in the MPE calculation.*
**Reviewers Comments:** MPE has not been up dated yet.
yes, the measured max output power is 0.387W,but the max output power for disign is 0.5W. so we think if we use 0.5W ,it's will be more proper.

**Issue # 13 –** *The conducted spurs at the antenna terminals should have been performed with a 1 MHz RBW. Please perform this testing using 1 MHz RBW and up to the 10$^{th}$ harmonic of the fundamental.*
**Reviewers Comments:** This appears to not have been addressed.
For this test item ,our test equipment can just perform this test up to 13GHz,and after 13GHz,there no other frequencies used ,can you accept it?

**Issue # 14 –** *The VBW of some of the plots for the occupied bandwidth section are less than the RBW. Please retake these plots.*
**Reviewers Comments:** OK, for future filings please make sure VBW>RBW.
no problem;

**Issue # 16 –** *It appears the band edge measurements were not properly performed. Compliance with these rules is based on the use of measurement instrumentation employing a resolution bandwidth of 1 MHz or greater. However, in the 1 MHz bands immediately outside and adjacent to the frequency block a resolution bandwidth of at least one percent of the emission bandwidth of the fundamental emission of the transmitter may be employed. A narrower resolution bandwidth is permitted in all cases to improve measurement accuracy provided the measured power is integrated over the full required measurement bandwidth (i.e. 1 MHz or 1 percent of emission bandwidth, as specified). The emission bandwidth is defined as the width of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, outside of which all emissions are attenuated at least 26 dB below the transmitter power.*
**Reviewers Comments:** Has not been addressed. If you are only finding the peak at the band edges it must be done with a 1 MHz RBW. You may use a lower bandwidth but you must use integration methods. Please see my explanation in the original RT.
yes,we will correct it on next FCC project .this time can you accept it ?

**Issue # 17 –** *Please indicate to which voltage and frequency the conducted emissions voltage were performed to in the part 15B test report.*
**Reviewers Comments:** Could not find in the test report where you have indicated this information. Can you please provide the page number where this can be found?
we correct the test report.

Please note the test report still list the FCC ID as Q78-ZXMBW E9200, there should not be a space in the FCC ID. It is recommended the ID be corrected in the test report. \
the FCC ID is Q78-ZXMBW-E9200

If you have any questions, please let me know.


_____
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_____

# Request for Additional Information for EMC Certification

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|---|---|---|---|---|
| **Company:** | ZTE Corporation | **Composite Device:** | **Yes:** ☐ | **No:** ☒ |
| **MT#:** | 81445 | **FCC Direct Filing:** | **Yes:** ☐ | **No:** ☒ |
| | | **Permit But Ask:** | **Yes:** ☐ | **No:** ☒ |
| **FCC ID:** | Q78-ZXMBW-E9200 | **FCC Rule Part:** | 27 | |
| **UPN:** | N/A | **RSS Standard:** | - | |
| **FRN:** | 0007895832 | **Class II PC/Reassessment:** | **Yes:** ☐ | **No:** ☒ |

April 1, 2009

Dear Wei,

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.

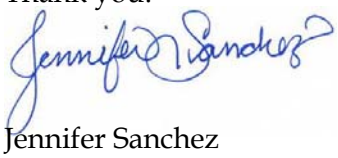
**Technical Review:**

1. It appears that modulation characteristics are not required for your device. Please remove this section.
2. The concern about the duty cycle has not been addressed. Why is there a duty cycle on one of the channels and not the rest (i.e. there appears to be a duty cycle on the high channel).
3. The power limit is listed in terms of EIRP. The power from the unit must be expressed as an EIRP using the highest gain antenna used with the device and then compared to the limit. This has not been fully addressed. Please label "Total Power in W" column as "EIRP" on page 8 of the test report. Please show calculation or reason for stating test limit as 2000W. This does not appear to be the limit.
4. Form 731 has the wrong power listed; the conducted power stated in the test report is 0.387 Watts. Please see revised Form 731 with corrected information for your records.
5. The user manual does not have a statement concerning minimum safe distance. There should be a statement that the antennas should be installed such that it is 20 cm from all persons and not co-located. Please also include the 15.21, 15.105 statements in the manual. The 15.19 statement is in the manual; however this is required to be on the label.
6. The MPE calculation is still not correct. The power at the antenna terminals (i.e. conducted power) is not 26.7 dBm as stated in the test report. If the two antennas can simultaneously transmit then co-location also needs to be addressed in the MPE calculation.
7. Conducted spurs need to be made with a 1 MHz RBW for above 1 GHz. The plots are also not labeled making it hard to figure which channel they correspond with. There is only 1 plot that shows the conducted spurs up to 26.5 GHz. Plots need to be provided for the low, middle and high channels of the device.
8. The VBW of some of the plots for the occupied bandwidth section are less than the RBW. Please retake these plots.

9. It appears the band edge measurements were not properly performed. Compliance with these rules is based on the use of measurement instrumentation employing a resolution bandwidth of 1 MHz or greater. However, in the 1 MHz bands immediately outside and adjacent to the frequency block a resolution bandwidth of at least one percent of the emission bandwidth of the fundamental emission of the transmitter may be employed. A narrower resolution bandwidth is permitted in all cases to improve measurement accuracy provided the measured power is integrated over the full required measurement bandwidth (i.e. 1 MHz or 1 percent of emission bandwidth, as specified). The emission bandwidth is defined as the width of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, outside of which all emissions are attenuated at least 26 dB below the transmitter power.
10. Please indicate to which voltage and frequency the conducted emissions voltage were performed to in the part 15B test report
11. What were the RBW and VBW settings for the spectrum analyzer when making radiated spurious emissions? This needs to be in the test report.
12. The label should contain the 15.19 statement since the device is big enough to fit this statement. Please revise the label or provide a justification as to why this statement will be in the manual instead.

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

Thank you!



Jennifer Sanchez
TCB Administrator
MET Laboratories, Inc.
tcbinfo@metlabs.com

Admin Review By: Jennifer Sanchez
Technical Review By: Dusmantha Tennakoon

*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.*

**Jennifer Sanchez**

**From:** Jennifer Sanchez
**Sent:** Thursday, April 02, 2009 9:15 AM
**To:** Dusmantha Tennakoon
**Cc:** Shawn McMillen; Angela Kekovski; Jenn Warnell; Jennifer Sanchez
**Subject:** FW: 81445 ZTE - TCB 3rd Request for technical information
**Importance:** High
**Attachments:** E9200 Indoor PICO Base Station User Manual_Rev3.pdf; Revised Label.pdf; Q78-ZXMBW E9200_Test Report_Rev3.pdf; Part 15 test report(updated_Rev3).pdf; 81445 ZTE - Form 731.pdf

Hi Dusmantha,

Please see ZTE's response below. I have attached the revised test reports, form 731, manual and label.

Jennifer

**J. Sanchez**
TCB Administrator
**MET Laboratories, Santa Clara CA**
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408-829-1603 Cell
jsanchez@metlabs.com

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**From:** wei.bin3@zte.com.cn [mailto:wei.bin3@zte.com.cn]
**Sent:** Wednesday, April 01, 2009 8:28 PM
**To:** Jennifer Sanchez
**Subject:** 答复: 81445 ZTE - TCB 3rd Request for technical information

Dear Jennifer,
As we disscussed in the phone,I sumed as below:
Issue 1,we must remove the modulation characteristics section in the updated test report;
issue 2,can you tell me the details ,maybe next project we can correct it.for this project ,can you persuade you engineer accept the test result?
issue 3,The EUT max RF output power is 0.5W(for design value),but the max RF output power is 0.387W(measured value),the EIRP is the measured value add the antenna gain(2.2dBi),so EIRP is 0.643W,I have correct it in the test report;
issue 4,updated the 731 form;
issue 5,we will add such satement on the user mannual;
issue 6,we evaluated the MPE using the max design value 0.5W,in normal work conditions just one of the two antenans working.
issue 7,we do conducted spurious below 2495MHz,we use the RBW is 100kHz, From 2691MHz to 26.5GHz we use the RBW is 1MHz .cause low ,middle ,high channels of the device have the same value of conducted spurious from 2691MHz to 26.5GHz,so I just use one picture.and we know above 1GHz we must use RBW 1MHz ,but this time we using a strict method ,this method can not effect the test result. can you accept this time ;
issue 8 and issue 9,cause we have not EUTs in our labs now, so if you evaluated the test method do not effect the test result.can you accept for this EUT;
issue 10,I will add the power supply information on the PART15B test report;
issue 11,we will add in the updated test report;
issue 12,We will add the satement on the labels and uer mannual;

PS, because this is the first project for our cooperation,and we need finish the FCC ID certification quickly,so we hope you can accept some defects,maybe we can improved in next project.

ok ,if there are any questions ,pls let me know. thank you very much !

Wei bin 153595 Quality Dept.
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**Jennifer Sanchez**

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**From:** Dusmantha Tennakoon
**Sent:** Tuesday, April 07, 2009 6:27 AM
**To:** Jennifer Sanchez
**Cc:** Shawn McMillen; Jenn Warnell
**Subject:** RE: about the E9200 FCC ID certification

We went over the test report and decided to accept most of the RTs for this filing only. Please have the client only address the following:

7. Please remove the limit in the conducted power section.
8. The equipment class is TBC and the power is 0.387 Watts. These values need to be in form 731.
9. FCC safe distance statement does not appear to still be in the user manual.

Best Regards,

Dusmantha

## Jennifer Sanchez

**From:** wei.bin3@zte.com.cn
**Sent:** Sunday, April 12, 2009 5:24 PM
**To:** Jennifer Sanchez; Stanford Liao; Jenn Warnell
**Subject:** updated user manual
**Attachments:** sjzl20081067-ZXMBW E9200 Indoor PICO Base Station User Manual.rar

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Wei bin 153595 Quality Dept.
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Mobile：0086-130 2792 3620 MSN： hbweib@hotmail.com
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