



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

November 26, 2006

RE: ZTE Corporation

FCC ID: Q87-ZXMBW-TP251

I have a few additional comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) FYI: We received email correspondence from FCC yesterday indication that they hope to have some sort of guidance to us by November 27. This means, assuming the time zone differential between the FCC laboratory and Asia, the earliest we might expect to hear back from FCC will be November 28.
- 2.) FYI: With your permission, I would like to add the new operational description to the information already submitted to FCC. Will that be acceptable?
- 3.) The Internal Photographs still need work. The focus is unsatisfactory and is insufficient to resolve layout details on the card. As a "Rule of Thumb" the photographs should be large enough and detailed enough to clearly see the component numbers on the ICs.
- 4.) You have stated that you prefer DoFC to Certification as a Class B computer peripheral. You are reminded that due to the current state of MRAs between USA and China, no Chinese EMC laboratory is qualified to issue a DoFC in lieu of Certification.
- 5.) The Tune-Up procedure states that "...Manufacture shall set frequency and initial power value in card before card leave factory...", but there is no indication of what these power and frequency values are. Please review and resubmit RF power target tune-up values.
- 6.) There is no proper identification of the z-axis plot presented on page 39 of the SAR report. It would be prudent for this case to provide z-axis plots of the SAR performance of this device in all tested hosts. In addition, we recommend a z-axis plot be presented for the validation plot on the day of the test.
- 7.) Your correction on page 14 of the SAR report is incomplete. I believe we have somehow mixed system validation with system check.. If I have misrepresented, my apologies. The system check for this should be at 2550 MHz. Table 1 on page 19 should show the tissue electrical parameters at 2550 MHz, true? If you wish to use 2450 MHz tissue for 2550 MHz testing, then please refer to the standard and justify it's use.
- 8.) Please see SAR report page 11. What is the recipe used for body tissue at 2550 MHz in Section 4.2.3.3? This is required by FCC.
- 9.) The answer to my question #10 from November 22 is insufficient. I requested a "touch position" [0cm spacing – nose touching phantom vertical], and your response was to indicate that 1.5cm spacing was utilized and no results were presented because the results were "too small". This may be true, but WiMax is still considered a new technology. FCC must have all possible information to adequately determine the suitability of a specific device for Certification. Please provide additional SAR data with nose of this device in a touch position as requested in my November 22 letter.
- 10.) The answer to my question #11 from November 22 is insufficient. FCC is aware that typical test signals used for WiFi and WiMax are usually not a true CW. It is typical for the "CW Test Mode" in many test software implementations to actually have some sort of duty cycle. This means the transmitter will be on for a certain period followed by an off period. You must with test results document within this filing the actual duty cycle of the transmitter using the applicable test software. This is typically done within the SAR report.
- 11.) Within the Test Report, the RF conducted power is indicated to be approximately +22.3dBm. What were the settings of the Agilent PSA spectrum analyzer for this result? Are there any hard copies or plots available to confirm this measurement?

- 12.) Please refer to page 9 of the Test Report. Could you please detail the meaning of EVM and where the -18dBm limit is derived?
- 13.) Please check the Manual, page 12. It would be better to state: "...The highest SAR value reported under this standard during product certification for use when used next to the body in a typical notebook computer with side-mounted PCMCIA port..." Other language may also be acceptable. The language you used is more applicable to mobile phones – not PCMCIA cards for notebook PCs.
- 14.) The 20cm statement in paragraph 2 on page 12 of the Manual is irrelevant for FCC. It should be removed. The 20cm statements in the Personal Safety chapter are just fine as they reference specifically to medical devices.
- 15.) I do not see warnings against co-location of transmitters. Is it here and I have just missed it? It should have language such as "...This device should not be co-located or operating in conjunction with any other transmitter or antenna..." or equivalent.



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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.