

Request:

1) Magnitude of the radiated spurious emission

Answer:

Please find attached the revised test report with the magnitude of the radiated spurious emission.

2) Conducted power was measured on the same device as used for SAR testing

Answer:

Please find attached the SAR_declaration and the ITS_T_HU_Response.

3) Updated user manual. Page 6 contains the incorrect FCC ID.

Answer:

Please find attached the revised User Manual.

4) Justification for probe calibration for body liquid.

Answer (Aprel):

A copy of the body calibration certificate is attached.

5) New head SAR plots. Current plots show the hot spot cutoff. Hot spot must be completely scanned.

Answer (Aprel):

When the scan parameters were extended to cover a larger area the conservative SAR and location of the cube did not change. Additional plots for the conservative SAR device position and frequency showing the SAR location, and distribution shall be generated and provided at a latter date.

Please find attached the ITS_T_HU_Response

6) SAR should be measured with and without such a memory chip.

Answer (Aprel):

APREL laboratories were never provided a copy of the user manual.

Revision of the user manual is out side of the scope for the project.

It is the responsibility of either the organization that put together the submission package, or the TCB to identify that a peripheral attached to the DUI has not been assessed and as such additional measurements need to be made. The device, which APREL received, has no provisions for an additional memory card (unless this would be located within the SIM card assembly). A request was made to ITS for ALL accessories, and peripherals to be provided to APREL for inclusion into the test plan.

“ITS DID NOT” provide APREL with the above mentioned memory chip (or DUI), and as such this was not included in the assessment.

7) Justification that the probe calibration is suitable for GSM signals.

Answer (Aprel):

DCP data is provided within the SAR report. Section 5.1 “ALIDX-500 Measurement System”

of both SAR reports provides the details of how the system handles pulse modulation devices.

8) Update Form 731

Answer:

Please find attached the revised Form 731

FYI Normally RHS tilt SAR data is required.

Answer (Aprel):

If the lab follows the requirements of IEEE P-1528, it is not always necessary to assess a DUI fully if it can be justified that the conservative SAR has proven to be found through the executed test process. This was the case with the CMCS Bach device. Due to the time restriction involved with the assessment of this device executing tests, which were deemed unnecessary would have delayed the project completion time. Unnecessary assessment of a DUI can lead to delays and additional costs to a project.