



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

December 8, 2008

RE: FCC ID: QTKRM-368_ATCB007051

Attention:

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that as this is a permit but ask application the test report will need more in depth explanation of test modes. The report states that the device was tested 'with maximum rated TX power, modulated with pseudo random bit sequence (PRBS9)'. However, I believe PRBS9 is typically a BT or other 802.xx test pattern and I am not aware of it relating to cell/PCS REL 6 devices. Please provide an explanation of why this mode and configurations was used for the testing and please explain the modes/configuration/functions for the CELL/PCS test. Please justify what was done to establish the particular mode/function/configuration was worse case.
2. Also, please note that the test report should be specific as to which test was using REL 6 capabilities.
3. In regards to item 1 above, please correlate and explain any differences between modes/configurations/functions that may be different between the SAR testing and the EMC testing.
4. Please note that part of the PBA requirements the FCC has stated are as follows:

When Release 6 HSPA equipment certifications are received by a TCB, a Permit-But-Ask (PBA) must be requested by the TCB through the FCC KDB to enable a TCB to accept and review such filings. The TCB should request the following information from the grantee/manufacturer or its test laboratory and verify the information before submitting a PBA request:

- a) Output power measurement results according to the FCC 3G SAR measurement procedures (KDB 941225)
- b) Verify the power measurement results against device specifications and 3GPP requirements, including but not limited to the sub-test configurations and Maximum Power Reduction (MPR) requirements, to determine if HSPA SAR evaluation is necessary.

The TCB is responsible for resolving any power measurement issues prior to submitting the PBA; otherwise, the PBA cannot be justified.

The TCB must verify the power measurement results according to 3GPP MPR requirements and how it is implemented in the device being tested; for example, a power reduction on the order of 0, 2, 1, 2, 0 dB are expected for the HSPA sub-test configurations 1 – 5, respectively, when implemented according to 3GPP recommendations. Otherwise, detailed explanations must be included in the PBA as well as the final SAR report to substantiate the test results.

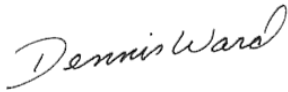
When no additional SAR measurement is necessary for HSPA, based on the power measured for the MPR implementations, a PBA is justified.

The TCB should confirm that operating parameters such as the different β and Δ values are configured properly and the power measurement procedures used have included the power setback considerations specified in 3GPP TS 34.121. It must be ensured that the HSPA channels have remained active with the required E-TFCI and AG index values maintained during the durations of the measurements.

- c) If the power measurements indicate that SAR measurements are necessary for HSPA, the detailed procedures, with respect to 3GPP TS 34.121 for HSPA, must be reviewed by the TCB to determine that the required HSPA test parameters, including

stable TFCI and output power conditions, have been used for the HSPA SAR measurements; other related HSPA issues identified in the corresponding KDB must also be addressed before the PBA can be authorized.

Please note that I do not find in the SAR report where all these concerns from the FCC are addressed. Please address and provide detailed explanations of all of the above in the SAR and EMC report for parts 22 and 24.

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward
<mailto:dward@AmericanTCB.com>

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. Except as described in §0.459, correspondence and responses 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.