

RE: ATCB
FCC ID: RXSCT5888

1.) *The Form 731 does not contain required information. Please provide (at minimum) a technical contact for line 2(a), and equipment specifications line 5.*

Re: Sorry, I have updated it. Please see file "RXSCT5888_731 form_Rev1.pdf"

2.) *The confidential request letter should be addressed to FCC, not specifically ATCB. In addition, the confidential request letter asks for withholding the internal photographs from public view. This is not permitted. In addition, common files such as parts list and tune up procedure are allowed to remain without confidentiality. Please review and reconsider.*

Re: updated. Please see file "RXSCT5888_Confidentiality Request Letter_Rev1.pdf"

4.) *The 15.19(a)(3) statement appears to be missing. It must either appear on the Label (preferred) or within the Manual. Kindly review.*

Re: updated. Please see file "RXSCT5888_User Manua_Rev1.pdf"

5.) *This device is capable of connecting directly to a computer via a USB cable. This means an additional equipment authorization procedure is required when this device is considered a "computer peripheral". This means either DoFC or Certification to Part 15B is required. If DoFC then the FCC logo must appear on the label and this device must be tested at a US recognized and accredited laboratory. Kindly review with your client.*

Re: You are right, we add the test of Part15B. We would like to get two Grant under one FCC ID. One is part15B, one is part 24. Please see file ""

8.) *All Part 22/24 mobile phones with non-detachable antennas must have their rated RF power listed in terms of radiated values. For Part 22, all radiated power should be in terms of dipole equivalent power (ERP). For Part 24, all radiated power should be in terms of isotropic power (EIRP). Typically the FCC requires, according to Knowledge Base index 442401, that an "independent calibration substitution methods must be done". This is often interpreted to mean that the calibration field to determine radiated power should be done at frequent intervals, and some argue that it should be done the day of the test. "Pre-calibration", as expressed in Section 9.2 of the Test Report, is not sufficiently explained.*

Re: For general Radiated Emission (Field Strength in dBuV/m) test we adopted the method prescribed in ANSI C63.4, e.g. in semi-anechoic chamber with a reference ground plane and a turntable height of 80cm. See chapter 4.3 of the report FCC06-8001.

For Radiated Power (EIRP or Spurious Radiation in dBm) test, "Substitution Method" should be used. The test procedure given in TIA-603-B-2002 is OK for EIRP/ERP test, but too complicated for spurious radiation test. It takes very long time to search so many spurious, varying the direction of the turntable and the height of the antenna, and then measure the signal generator level for each spurious with a proper antenna substituting the EUT.

Many EMC lab now use full anechoic chamber for radiated power test. It's described in 3GPP TS 51.010-1 version 5.10.0 Release 5 (see attachment), the ETSI standard for mobile FTA certification. "The ground should be covered with absorbing material 1 m thick..."

"...because the floor absorbers reject floor reflections, the antenna height need not be changed and shall be at the same height as the test sample."

In full anechoic chamber, we can use "Pre-Calibration Method"(see attachment), the principle of which is similar to substitution method but the test procedure is simpler. The air lost of the site and the factors of the test system is calibrated before measurement, so the radiated power ("dBm-MHz" plots) can be obtained directly.

We hope ATCB kindly accept this method. Thank you.

9.) FYI: The Block Edge test results in Section 5.5 and 8.5 appear unclear. It would be helpful if a smaller span was used and a limit line of -13dBm was shown.

Re: According to FCC §24.238 (b), 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. Thus the 26dB emission bandwidth is measurement for showing compliance at the band-edges. The test plots in section 8.5 showed 2MHz bands immediately outside and adjacent to the frequency block. The test plots also showed:

- RF output power measured, &
- The limit line (26dB from RF output power measured), &
- The edge of the frequency block

10.) Using the Internal Photographs, the antenna appears to align along a horizontal direction at the upper edge of the flip phone when used in a "normal" position. But using your Test Setup Photo (RSE) and the description in the Test Report [Section 9.2 (d)] the test procedure where only the vertical polarization at a fixed height may not produce the highest radiated power. Kindly recheck your results. If I have made any misjudgment about your procedure or the antenna position inside the phone, my apologies. FYI: I suggest that the height of the antenna be varied to assure that the highest radiated values are observed.

Re: Sorry. The test procedure (Section 9.2) was a mislead. "The polarization of the receiving antenna was the same as that of the EUT transmitting antenna." This was correct for EUT with external rod antenna. But, for a mobile phone with internal antenna, we didn't break the it and check its antenna direction before the test. Instead, we measured both vertical and horizontal direction. The test plot was Maxhold value of both. I think I should described it clearly in the report next time.

11.) FYI: When doing AC Conducted Emissions, FCC and ANSI C63.4 do not recognize the use of an extension cord or strip outlet in series with the LISN (Test Setup Photo CE and RE). Only AC powerline emissions where the wall mounted supply is plugged directly into the LISN is recognized.

Re: You are right, Sir. We will performed the CE and RE tests again, with the mounted adapter plugged directly into the LISN.

12.) The DoC letter on page 100 of the Manual is very difficult to read. Could you kindly provide a clear copy of this document?

Re: updated. But that is the DoC used for CE certification.

13.) The AC charger shown in the External Photos does not appear to be set up for 120Vac. Please confirm the AC conducted emissions test was performed at 120Vac

Page 2 May 3, 2006

Re: The adapter was with wide range of input voltage, 100-240V.

We confirm that the AC conducted emissions test was performed at 120Vac.

14.) Please provide a manufacturing tolerance for the target values shown in the Tune Up procedure.

Re: updated. Please see "RXSCT5888_tune_up_procedure_Rev1.pdf"

15.) Please provide a Z-axis plot as the probe is drawn away perpendicular from the hot spot in the phantom. This plot is required by FCC for the highest SAR plot for head and for body.

Re: Our SAR test system released the report automatic, but the three-dimensional test log can't display at the final report. And we have informed the system manufacture our requirement, they may update the software at the next version.

16.) *There are no dipole validation plots associated with section 4.2.5 for either head or body. These validation tests must be performed on the same day as the final SAR tests. Kindly provide this data.*

Re: Please check page 14 of SAR report "RXSCT5888_SAR Report_Rev1.pdf".

17.) *The manual on page 49 appears to indicate this device is capable of GPRS operations. In most cases, all body SAR measurements are expected to utilize GPRS with at least a 1:4 duty cycle during testing. Please review.*

Re: We add the GPRS test at the Report. Please review the "RXSCT5888_SAR Report_Rev1.pdf"

18.) *RF conducted power measurements are absent from this SAR report. In general, it is recommended that conducted power measurements be performed at the beginning of SAR testing to confirm that RF power duplicates that found in the Test Report.*

Re: Please check the page 20-22, line of "power level" (relative to "conducted power") .

19.) *Kindly indicate where I can find the voltage and current through the final amplifying circuit as required by 2.1033(c)(8).*

Re: dc voltage: 3.5v to 4.2v

dc current: 70mA(min) to 300mA(max)

20.) *An attestation letter indicating knowledge that this device contains GSM and DCS frequency bands not operational in USA or it's territories is required.*

Re: Please see "RXSCT5888_DeclarationLetter_USChannel.pdf"