

28 November 2007

Equipment Authorization Division
Office of Engineering and Technology
Federal Communications Commission
7436 Oakland Mills Road
Columbia, MD 21046
Ref: FCC ID: VFM-NSZMNS9000

Dear Sirs:

Hangzhou Newsky Technology Co., Ltd requests acceptance of the labeling proposal described below for mobile phone bearing FCC identifier VFM-NSZMNS9000.

The subject mobile phone are compact handheld models as shown in figure 1, authorized under 47 CFR Part 22, 24 & 15.247 for mobile services.



Figure 1.

Because the majority of the mobile phone housing is composed of display, speaker, operating controls, and a removable battery pack, there is extremely limited space available to attach the required label carrying the FCC identifier. Attaching the label to the battery pack is not acceptable because the battery pack is a removable item. For this reason, Newsky proposes placing the label carrying the FCC identifier inside the battery compartment as shown in figure

2.

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Figure 2.

The consumer packaging for these models includes the battery pack as a separate item, NOT installed on the radio. As such, the FCC identifier will be readily visible to the user before the battery pack is installed and whenever the battery pack is removed or replaced. In this location, the label will also be protected from physical abuse and remain readable for the anticipated life of the device.

The consumer packaging for these models is a "gift box" which does not allow the mobile phone to be seen at time of purchase. In order to meet the requirements of 47CFR Part 2.925(d), Newsky will add the FCC identifier "VFM-NSZMNS9000" to the outside of the consumer "gift box" packaging.

Sincerely,

Ronald Wu
Engineering Manager

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