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**From:** Adam Gould  
**Sent:** Monday, December 01, 2008 9:07 PM  
**To:** PCTEST TCB  
**Subject:** RE: Questions Regarding FCC ID: WKH-BMX-SPT  
[Hello Greg,](#)

Thank you for your attention on this matter.

Below, please find our comments inline, as well as a set of document attachments to answer your questions.

Please let us know if you need more information.

best regards,  
adam

*Adam Gould  
General Manager Reference Products Group  
NextWave Mobile Products*

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**From:** PCTEST TCB  
**Sent:** Wednesday, November 26, 2008 3:17 PM  
**To:** Adam Gould  
**Subject:** Questions Regarding FCC ID: WKH-BMX-SPT  
To: Mr. Adam Gould/ Nextwave  
From: Mr. Gregory Czumak / PCTEST TCB

RE: FCC ID: WKH-BMX-SPT

Applicant: Nextwave

Correspondence Reference Number: WKH81106  
Confirmation Number: 811251106  
Date of Original Email: November 26, 2008

Subject: Request for additional information

In regards to your recent TCB application referenced above, we kindly request that you provide the following additional information.

1. The Cover Letter indicates that, in order to qualify as a mobile device with respect to RFx, the USB cable is permanently attached to the EUT. Please provide photos, external and internal, that show this.

This was an error in the Cover Letter. The cable is not permanently attached, but is required to be attached in order to be used in WiMAX mode. The Cover Letter has been modified, and is enclosed as "Cover Letter v2.pdf"

2. Please submit internal photos of the EUT that show both sides of all pcb's, with all RF shielding removed so that the traces are clearly visible.

Please find photos enclosed, in "SPT-BMX photos.zip"

3. Please submit a Block Diagram of the WiMAX transmitter that shows all clock/oscillator values, as required by the FCC Rules.

Please find a block diagram enclosed of the WIMAX transmitter, entitled "WiMAX RF Block Diagram.pdf"

4. Please submit a Tune-Up Procedure for the WiMAX transmitter.

Please find a Tune Up Procedure document enclosed , entitled "Tune Up Procedure.pdf"

5. Please provide a photo/drawing showing the intended location of the FCC ID label. Please note that the FCC ID label must be permanently attached to the EUT (i.e., it cannot be affixed to a removable part) and it must be readily visible at the time of purchase.

Please find a photo of the intended location, file titled "Label Location.pdf"

6. The BMX-SPT User's Guide has multiple references to a removable USB cable (e.g., pp. 4, 14, 17, 18, etc.). Since the USB cable is to be permanently attached to the EUT, please revise this User's Guide accordingly and resubmit it.

As indicated in item 1, this was an error in the Cover Letter, and has been corrected in the new enclosed cover letter.

7. The BMX-SPT User's Guide does not contain the information to the user required by Sections 15.19(a)(3), 15.21, 15.105(b) and the RFX warning statement for mobile operation (in WiMAX mode) (e.g., In order to comply with FCC RF Exposure requirements, when used in WiMAX mode, a minimum separation distance of 20 cm must be maintained between this device and all persons.). Please revise this User's Guide accordingly and resubmit it.

The User's Guide has been modified accordingly, and is included as "BMX-SPT user guide 12-1-08.doc"

8. The maximum SAR level for portable (SPOT) operation must be entered in the SAR Statement in the BMX-SPT User's Guide for body-worn operation (reference to lap-use should be removed, as it is not applicable). In addition, the user must be cautioned that compliance has been demonstrated with the specific body-worn accessory (belt clip) provided with the EUT, and that use of unauthorized body-worn accessories may result in non-compliance with FCC RF Exposure requirements. Please revise and resubmit.

The User's Guide has been modified accordingly

9. The SPOT User's Guide does not contain any of the required user information. Please confirm that the BMX-SPT User's Guide will be provided with every unit sold, in addition to this Guide.

[Yes, that is correct.](#)

10. In Table 4 of the USTech Part 25 EMC report (p.10), the units in the Results column should be dBuV/m, and not uV/m. Please revise. Please explain how the Limit values listed in this Table were determined- they do not appear to correspond to 15.109 Class B levels.

[This information was submitted by USTech directly to PC Test](#)

11. It appears that the dipole used for the SAR System Verification test is tuned to a frequency (1800 MHz) outside of the EUT's operating frequency range and probe's calibrated range (1650 +/- 50 MHz) for the specific emissions being tested. The dipole used has a return loss of much less than -20 dB at 1610 MHz (per SAR Report p.21) which is against the recommendation per IEEE 1528 Section 8.2.3 (-20 dB) for dipoles used for system verification tests and also of that recommended in KDB 450824 (-15 dB return loss for both Method A and B for System Verification). Please evaluate the system verification complying with these recommendations, or you may wish to obtain permission from FCC via the KDB system for the System verification methodology employed in this application.

[We understand this issue is being resolved between CellTech, PC Test and OpenRange.](#)

The items indicated above must be submitted before processing can continue on the above referenced application.

Sincerely,

Gregory Czumak  
Senior Certification Engineer  
Quality Manager

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