



FCC PART 15.247

MEASUREMENT AND TEST REPORT

For

NEUTRANO INC.

3-255 Spinnaker Way, Vaughan,

Ontario, Canada L4K 4J1

FCC ID: XVW186013

Report Type: **Product Type:** Wrist Watch Phone **Original Report** Coolies. Bu **Test Engineer:** Cookies Bu **Report Number:** RSZA09121705-BT **Report Date:** 2009-12-29 Merry Zhao merry, when **Reviewed By:** EMC Engineer Bay Area Compliance Laboratories Corp. (Shenzhen) **Prepared By:** 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China Tel: +86-755-33320018 Fax: +86-755-33320008

Note: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by NVLAP*, NIST, or any agency of the Federal Government. * This report may contain data that are not covered by the NVLAP accreditation and are marked with an asterisk "*" (Rev.2)

TABLE OF CONTENTS

GENERAL INFORMATION	3
PRODUCT DESCRIPTION FOR EQUIPMENT UNDER TEST (EUT)	3
OBJECTIVE	
RELATED SUBMITTAL(S)/GRANT(S)	3
TEST METHODOLOGY	
TEST FACILITY	4
SYSTEM TEST CONFIGURATION	5
DESCRIPTION OF TEST CONFIGURATION	5
EQUIPMENT MODIFICATIONS	5
LOCAL SUPPORT EQUIPMENT LIST AND DETAILS	
CONFIGURATION OF TEST SETUP	
BLOCK DIAGRAM OF TEST SETUP	6
SUMMARY OF TEST RESULTS	7
FCC §15.247 (i) & §2.1093 – RF EXPOSURE	8
STANDARD APPLICABLE	
RESULT:	
FCC §15.203 – ANTENNA REQUIREMENT	
STANDARD APPLICABLE	10
ANTENNA CONNECTOR CONSTRUCTION	10
FCC §15.207(a) - CONDUCTED EMISSIONS	
APPLICABLE STANDARD	
MEASUREMENT UNCERTAINTY	
EUT SETUP	
EMI TEST RECEIVER SETUP	
TEST EQUIPMENT LIST AND DETAILS TEST PROCEDURE	
TEST PROCEDURE TEST RESULTS SUMMARY	
TEST DATA	
FCC §15.205, §15.209 & §15.247(d) – RADIATED EMISSIONS	
APPLICABLE STANDARD	
MEASUREMENT UNCERTAINTY	
EUT SETUP	
EMI TEST RECEIVER & SPECTRUM ANALYZER SETUP	
TEST EQUIPMENT LIST AND DETAILS TEST PROCEDURE	
CORRECTED AMPLITUDE & MARGIN CALCULATION	
TEST RESULTS SUMMARY	
TEST DATA	
DECALARATION LETTER	20

GENERAL INFORMATION

Product Description for Equipment under Test (EUT)

The *NEUTRANO INC*.'s product, model number: *w600FB*,*w600*,*w900*,*w900B*,*w510*,*w518*,*w528*,*w520* (*FCC ID*: *XVW186013*) or the "EUT" as referred to in this report is a *Phone watch*, which measures approximately: 22.5 cm L x 4.8 cm W x 2.3 cm H, rated input voltage: DC 3.7V battery, charging voltage DC 5V. And the manufacturer is *kingtech Electronic technology Limited*.

Adapter information: Manufacturer: Authin; Model: APW305UB-03-06;

Input: AC 100-240V 50/60Hz 0.15A; Output: DC 3-6V 1.2A Max. 5W Max.

SET: DC 5V 0.8A.

Frequency Range:

Cellular Band: 824-849 MHz (TX), 869-894 MHz (RX) PCS Band: 1850-1910 MHz (TX), 1930-1990 MHz (RX) Bluetooth: 2400-2483.5 MHz (TX/RX)

Modulation: GMSK (GSM), GFSK (Bluetooth)

Transmitter Output Power:

Cellular Band: 33 dBm; PCS Band: 30 dBm; Bluetooth: -6~4 dBm

All measurement and test data in this report was gathered from production sample serial number: 0912056 (Assigned by BACL, Shenzhen). The EUT was received on 2009-12-17.

*Note: The series products, model number: w600FB, w600, w900, w900B, w510, w518, w528, w520, we select w600FB to test, the difference of these models is just in model name, and all the above models are different from the original model number w960 except the mainboard, which was explained in the attached Declaration Letter.

Objective

This Type approval report is prepared on behalf of *NEUTRANO INC. in* accordance with Part 2, Subpart J, Part 15, Subparts A, B and C of the Federal Communication Commissions rules.

The tests were performed in order to determine compliance with FCC Part 15, Subpart C, and section 15.203, 15.205, 15.207, 15.209 and 15.247 rules.

According to the declaration letter from the applicant, the EUT has the same RF design as the previous certified product (FCC ID: XVW196860, grant date: 2010-04-19), the only difference between them are the antenna, LCD screen and the enclosure. So, the conducted emissions and radiated spurious emissions have been investigated, other items can be referred to the previous certified product.

Related Submittal(s)/Grant(s)

FCC Part 22H/24E submission with FCC ID: XVW186013.

Test Methodology

All measurements contained in this report were conducted with ANSI C63.4-2003, American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the range of 9 kHz to 40 GHz.

All emissions measurement was performed and Bay Area Compliance Laboratories Corp. (Shenzhen). The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

Test Facility

The Test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect test data is located in the 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China.

Test site at Bay Area Compliance Laboratories Corp. (Shenzhen) has been fully described in reports submitted to the Federal Communication Commission (FCC). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on November 21, 2007. The facility also complies with the radiated and AC line conducted test site criteria set forth in ANSI C63.4-2003.

The Federal Communications Commission has the reports on file and is listed under FCC Registration No.: 382179. The test site has been approved by the FCC for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, Bay Area Compliance Laboratories Corp. (Shenzhen) is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (Lab Code 200707-0).



The current scope of accreditations can be found at http://ts.nist.gov/Standards/scopes/2007070.htm

SYSTEM TEST CONFIGURATION

Description of Test Configuration

The system was configured for testing in a typical fashion (as normally used by a typical user).

Equipment Modifications

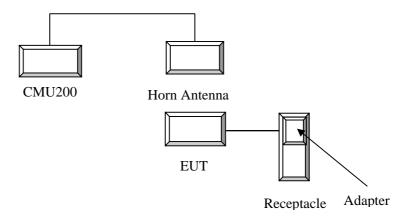
No modification was made to the unit tested.

Local Support Equipment List and Details

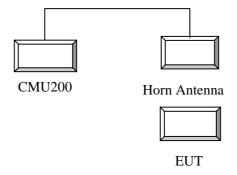
Manufacturer	Description	Model Serial Number		FCC ID
R & S	Universal Radio Commutation Tester	CMU200	109038	DoC

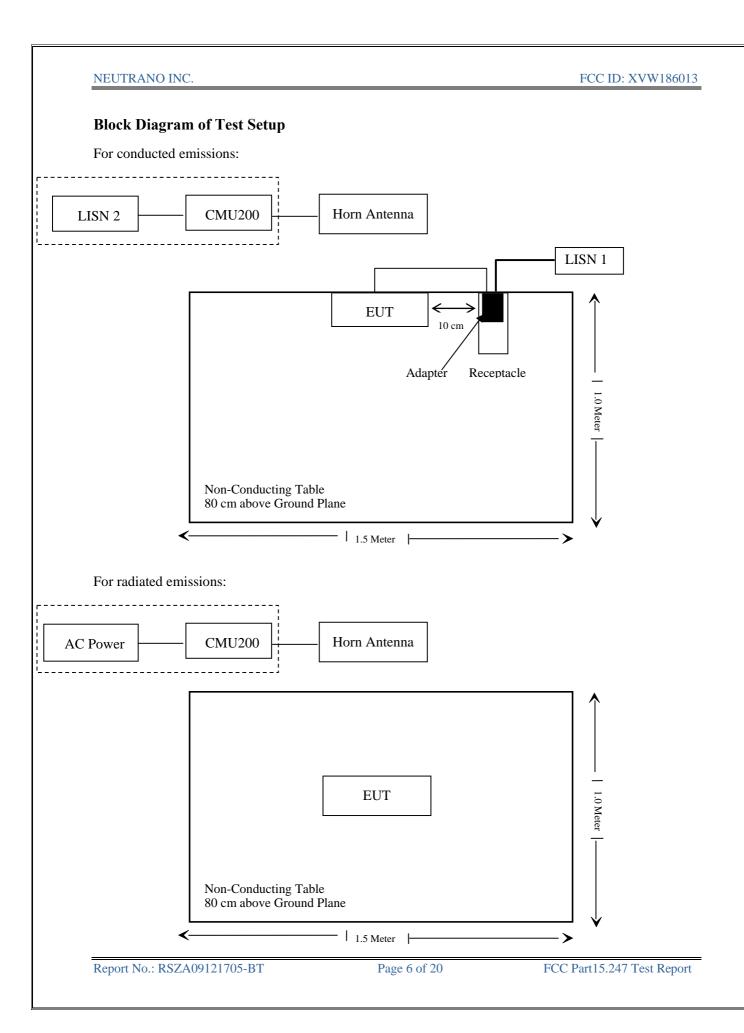
Configuration of Test Setup

For conducted emissions:



For radiated emissions:





SUMMARY OF TEST RESULTS

FCC Rules	Description of Test	Result
§15.247 (i), §2.1093	RF Exposure	Compliant
§15.203	Antenna Requirement	Compliant
§15.207 (a)	Conducted Emissions	Compliant
§15.205, §15.209, §15.247(d)	Radiated Emissions	Compliant
§15.247 (a)(1)	20 dB Bandwidth	Compliant*
§15.247(a)(1)	Channel Separation Test	Compliant*
§15.247(a)(1)(iii)	Time of Occupancy (Dwell Time)	Compliant*
§15.247(a)(1)(iii)	Quantity of hopping channel Test	Compliant*
§15.247(b)(1)	Peak Output Power Measurement	Compliant*
§15.247(d)	Band Edges	Compliant*

Note: * Please refer to FCC ID: XVW196860.

FCC §15.247 (i) & §2.1093 – RF EXPOSURE

Standard Applicable

According to FCC §15.247 (i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Table 2 - Summary of SAR Evaluation Requirements for a Cell Phone with Multiple Transmitters

	Individual Transmitter	Simultaneous Transmission
Licensed Transmitters	Routine evaluation required	SAR not required: Unlicensed only
Unlicensed Transmitters	When there is no simultaneous transmission — o output ≤ 60/f: SAR not required o output > 60/f: stand-alone SAR required When there is simultaneous transmission — Stand-alone SAR not required when o output ≤ 2·P _{Ref} and antenna is ≥ 5.0 cm from other antennas o output ≤ P _{Ref} and antenna is ≥ 2.5 cm from other antennas o output ≤ P _{Ref} and antenna is < 2.5 cm from other antennas o output ≤ P _{Ref} and antenna is < 2.5 cm from other antennas, each with either output power ≤ P _{Ref} or 1-g SAR < 1.2 W/kg Otherwise stand-alone SAR is required When stand-alone SAR is required o test SAR on highest output channel for each wireless mode and exposure condition o if SAR for highest output channel is > 50% of SAR limit, evaluate all channels according to normal procedures	o when stand-alone 1-g SAR is not required and antenna is ≥ 5 cm from other antennas Licensed & Unlicensed o when the sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas o when SAR to peak location separation ratio of simultaneous transmitting antenna pair is < 0.3 SAR required: Licensed & Unlicensed antenna pairs with SAR to peak location separation ratio ≥ 0.3; test is only required for the configuration that results in the highest SAR in stand-alone configuration for each wireless mode and exposure condition Note: simultaneous transmission exposure conditions for head and body can be different for different style phones; therefore, different test requirements may apply
Jaw, Mouth and Nose	Flat phantom SAR required o when measurement is required in tight regions of SAM and it is not feasible or the results can be questionable due to probe tilt, calibration, positioning and orientation issues o position rectangular and clam-shell phones according to flat phantom procedures and conduct SAR measurements for these specific locations	When simultaneous transmission SAR testing is required, contact the FCC Laboratory for interim guidance.

Routine SAR evaluation refers to that specifically required by § 2.1093, using measurements or computer simulation. When routine SAR evaluation is not required, portable transmitters with output power greater than the applicable low threshold require SAR evaluation to qualify for TCB approval.

Two antennas are available for the EUT, one is GSM /PCS antenna, the other is Bluetooth antenna, the distance between GSM/PCS and Bluetooth is above 2.5cm, according to FCC KDB 648474 D01 SAR Handsets Multi Xmiter and ant, V01r05 released on September 2008, the Max peak output power is 0.566 mW< P_{Ref} (12 mw) stand-alone SAR is not required for Bluetooth antenna.

Result:

The SAR measurement is exempt.

FCC §15.203 – ANTENNA REQUIREMENT

Standard Applicable

According to FCC §15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

Antenna Connector Construction

The EUT has 2 integral antennas soldered to the main board, both of them can not be accessed by the end-user and meet the requirement of FCC §15.203, Please refer to the EUT internal photos.

Result: Compliant.

FCC §15.207(a) - CONDUCTED EMISSIONS

Applicable Standard

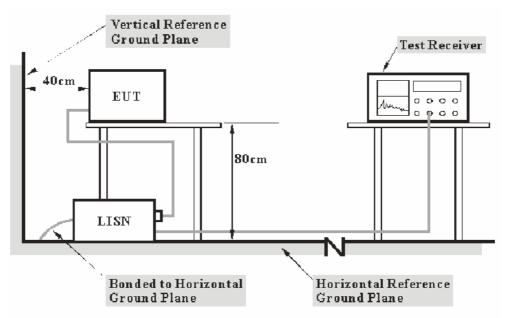
FCC §15.207

Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, and LISN.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the best estimate of the uncertainty of any conducted emissions measurement at Bay Area Compliance Laboratory Corp. (Shenzhen) is ± 2.4 dB.

EUT Setup



Note: 1. Support units were connected to second LISN.
2. Both of LISNs (AMIN) 80 cm from EUT and at the least 80 cm from other units and other metal planes support units.

The setup of EUT is according with per ANSI C63.4-2003 measurement procedure. The specification used was with the FCC Part 15.207 limits.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

EMI Test Receiver Setup

The EMI test receiver was set to investigate the spectrum from 150 kHz to 30 MHz.

During the conducted emission test, the EMI test receiver was set with the following configurations:

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCS30	830245/006	2009-04-28	2010-04-27
Rohde & Schwarz	L.I.S.N.	ESH2-Z5	892107/021	2009-04-28	2010-04-27

^{*} Statement of Traceability: Bay Area Compliance Laboratory Corp. (Shenzhen) attests that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

Test Procedure

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data was recorded in the Quasi-peak and average detection mode.

Test Results Summary

According to the recorded data in following table, the EUT complied with the <u>FCC Part 15.207</u>, with the worst margin reading of:

14.76 dB at 0.200 MHz in the Line conductor mode 13.84 dB at 11.700 MHz in the Neutral conductor mode

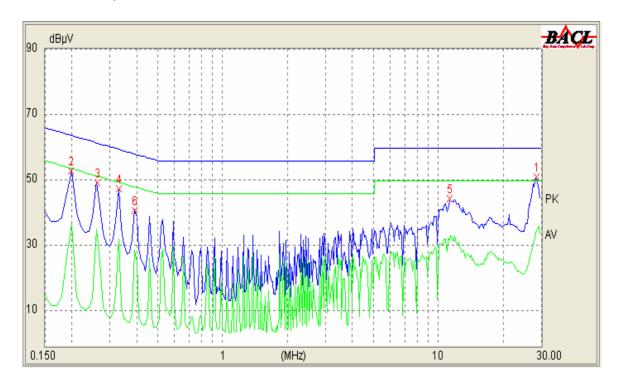
Test Data

Environmental Conditions

Temperature:	25 ° C
Relative Humidity:	48 %
ATM Pressure:	100.0 kPa

^{*} The testing was performed by Cookies Bu on 2009-12-25.

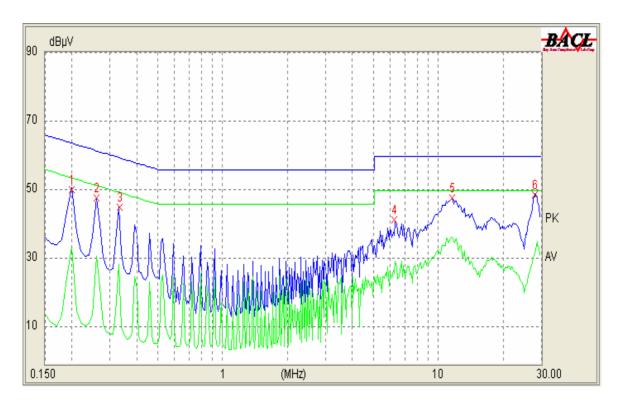
120 V/60 Hz, Line



Co	onducted Emissio	ns		FCC Part 15.20	7
Frequency (MHz)	Correction Factor (dB)	Cord. Result (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Remark (PK/AV/QP)
0.200	10.10	48.93	63.69	14.76	QP
28.820	10.30	35.14	50.00	14.86	AV
0.260	10.10	46.20	61.49	15.29	QP
0.330	10.10	43.70	59.51	15.81	QP
0.260	10.10	35.18	51.49	16.31	AV
0.200	10.10	36.69	53.69	17.00	AV
0.330	10.10	32.30	49.51	17.21	AV
11.310	10.30	32.02	50.00	17.98	AV
0.390	10.10	28.84	48.08	19.24	AV
28.530	10.30	40.51	60.00	19.49	QP
0.390	10.10	37.70	58.08	20.38	QP
11.310	10.30	36.70	60.00	23.30	QP

Page 13 of 20

120 V/60 Hz, Neutral:



Conducted Emissions				FCC Part 15.20	7
Frequency (MHz)	Correction Factor (dB)	Cord. Result (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Remark (PK/AV/QP)
11.700	10.30	36.16	50.00	13.84	AV
11.700	10.30	44.50	60.00	15.50	QP
0.200	10.10	47.52	63.69	16.17	QP
0.260	10.10	45.19	61.49	16.30	QP
0.330	10.10	42.48	59.51	17.03	QP
28.020	10.30	31.69	50.00	18.31	AV
28.010	10.30	41.08	60.00	18.92	QP
0.200	10.10	33.68	53.69	20.01	AV
0.260	10.10	31.17	51.49	20.32	AV
0.330	10.10	28.55	49.51	20.96	AV
6.240	10.20	25.96	50.00	24.04	AV
6.240	10.20	33.20	60.00	26.80	QP

FCC §15.205, §15.209 & §15.247(d) – RADIATED EMISSIONS

Applicable Standard

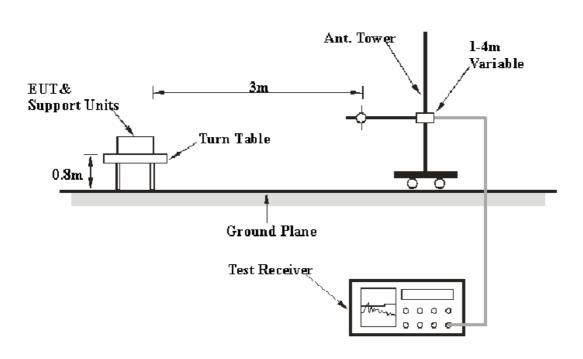
FCC §15.205; §15.209; §15.247 (d)

Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the best estimate of the uncertainty of a radiation emissions measurement at Bay Area Compliance Laboratories Corp. (Shenzhen) is $\pm 4.0 \text{ dB}$.

EUT Setup



The radiated emission tests were performed in the 3 meters chamber B test site, using the setup accordance with the ANSI C63.4-2003. The specification used was the FCC 15.209 and FCC 15.247 limits.

EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 25 GHz.

During the radiated emission test, the EMI test receiver & Spectrum Analyzer Setup were set with the following configurations:

Frequency Range	RBW	Video B/W	Detector
30MHz – 1000 MHz	100 kHz	300 kHz	QP
1000 MHz – 25 GHz	1 MHz	3 MHz	PK
1000 MHz – 25 GHz	1 MHz	10 Hz	AV

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
НР	Amplifier	HP8447D	2944A09795	2009-08-02	2010-08-02
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2009-11-07	2010-11-06
Sunol Sciences	Broadband Antenna	JB1	A040904-1	2009-03-11	2010-03-11
НР	Amplifier	8449B	3008A00277	2009-09-12	2010-09-11
Sunol Sciences	Horn Antenna	DRH-118	A052604	2009-09-25	2010-09-25
A.H. System	Horn Antenna	SAS- 200/571	135	2009-05-17	2010-05-17
Rohde & Schwarz	Spectrum Analyzer	FSEM30	849720/019	2009-08-28	2010-08-27

^{*} Statement of Traceability: Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

Test Procedure

For the radiated emissions test, the adapter was connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

Data was recorded in Quasi-peak detection mode for frequency range of 30 MHz-1GHz and peak and Average detection modes for frequencies above 1GHz.

Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain from the Meter Reading. The basic equation is as follows:

Corrected Amplitude = Meter Reading + Antenna Factor + Cable Loss- Amplifier Gain

The "Margin" column of the following data tables indicates the degree of compliance with the applicable limit. For example, a margin of 7dB means the emission is 7dB below the maximum limit. The equation for margin calculation is as follows:

Margin = Limit - Corrected Amplitude

Test Results Summary

According to the recorded data in following table, the EUT complied with the <u>FCC Title 47, Part 15, Subpart C, section 15.205, 15.209 and 15.247</u>, with the worst margin reading of:

Below 1 GHz:

2.4 dB at 42.113750 MHz in the Vertical polarization

Above 1 GHz:

10.94 dB at 4804.00 MHz in the Horizontal polarization (Low Channel)
11.16 dB at 4882.00 MHz in the Horizontal polarization (Middle Channel)
3.64 dB at 2483.56 MHz in the Vertical polarization (High Channel)

Test Data

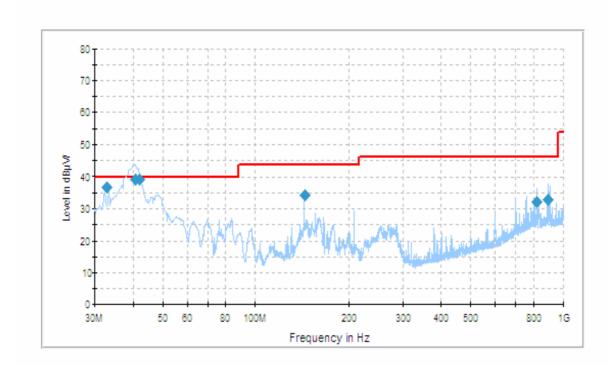
Environmental Conditions

Temperature:	25 °C
Relative Humidity:	48 %
ATM Pressure:	100.9 kPa

^{*} The testing was performed by Cookies Bu on 2009-12-23.

Test Mode: Transmitting

Below 1 GHz (Worst case)



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Position (degree)	Correction Factor (dB)	Limit (dBµV/m)	Margin (dB)
42.113750	37.6	101.0	V	302.0	-14.6	40.0	2.4*
40.656750	37.5	101.0	V	0.0	-13.7	40.0	2.5*
32.770250	37.0	101.0	V	229.0	-8.1	40.0	3.0*
144.005000	34.2	204.0	Н	311.0	-14.8	43.5	9.3
891.037250	32.9	101.0	V	338.0	-0.2	46.0	13.1
819.142250	32.1	143.0	V	5.0	-1.4	46.0	13.9

Above 1 GHz (Transmitting)

Frequency (MHz)	S.A. Reading (dBµV/m)	Detector (PK/QP/AV)	Direction (Degree)	Test Antenna			Cable	Pre-	Cord.	FCC Part 15.247/209		
				Height (m)	Polar (H/V)	Factor (dB/m)	Loss (dB)	Amp. Gain (dB)	Amp. (dBμV/m)	Limit (dBµV/m)	Margin (dB)	Remarks
Low Channel (2402 MHz)												
4804.00	32.26	AV	332	1.0	Н	36.6	7.60	33.4	43.06	54	10.94	harmonic
2317.53	36.12	AV	146	1.3	Н	30.9	7.91	34.0	40.93	54	13.07	spurious
4804.00	31.13	AV	178	1.0	V	35.4	7.60	33.4	40.73	54	13.27	harmonic
2331.96	35.67	AV	320	1.5	V	30.9	7.91	34.0	40.48	54	13.52	spurious
4804.00	45.52	PK	332	1.0	Н	36.6	7.60	33.4	56.32	74	17.68	harmonic
4804.00	44.85	PK	178	1.0	V	35.4	7.60	33.4	54.45	74	19.55	harmonic
2317.53	48.20	PK	146	1.3	Н	30.9	7.91	34.0	53.01	74	20.99	spurious
2331.96	47.90	PK	320	1.5	V	30.9	7.91	34.0	52.71	74	21.29	spurious
1147.10	35.05	AV	69	1.4	Н	25.2	4.78	34.6	30.43	54	23.57	spurious
1147.00	34.05	AV	152	1.5	V	24.0	4.78	34.6	28.23	54	25.77	spurious
1147.10	47.42	PK	69	1.4	Н	25.2	4.78	34.6	42.80	74	31.20	spurious
1147.00	48.05	PK	152	1.5	V	24.0	4.78	34.6	42.23	74	31.77	spurious
Middle Channel (2441 MHz)												
4882.00	32.03	AV	350	1.0	Н	36.6	7.61	33.4	42.84	54	11.16	harmonic
4882.00	31.80	AV	278	1.1	V	35.4	7.61	33.4	41.41	54	12.59	harmonic
4882.00	45.21	PK	350	1.0	Н	36.6	7.61	33.4	56.02	74	17.98	harmonic
4882.00	44.57	PK	278	1.1	V	35.4	7.61	33.4	54.18	74	19.82	harmonic
1166.40	35.08	AV	275	1.3	Н	25.2	4.79	34.6	30.47	54	23.53	spurious
1166.40	35.12	AV	110	1.2	V	24.0	4.79	34.6	29.31	54	24.69	spurious
1166.40	47.84	PK	275	1.3	Н	25.2	4.79	34.6	43.23	74	30.77	spurious
1166.40	48.29	PK	110	1.2	V	24.0	4.79	34.6	42.48	74	31.52	spurious
High Channel (2480 MHz)												
2483.56	46.15	AV	254	1.0	V	30.3	7.91	34.0	50.36	54	3.64*	spurious
2484.35	45.02	AV	135	1.2	Н	30.9	7.91	34.0	49.83	54	4.17	spurious
2483.56	59.62	PK	254	1.0	V	30.3	7.91	34.0	63.83	74	10.17	spurious
2484.35	58.41	PK	135	1.2	Н	30.9	7.91	34.0	63.22	74	10.78	spurious
4960.00	31.80	AV	135	1.2	Н	36.6	7.63	33.4	42.63	54	11.37	harmonic
4960.00	31.12	AV	141	1.1	V	35.4	7.63	33.4	40.75	54	13.25	harmonic
4960.00	44.95	PK	135	1.2	Н	36.6	7.63	33.4	55.78	74	18.22	harmonic
4960.00	45.07	PK	141	1.1	V	35.4	7.63	33.4	54.70	74	19.30	harmonic
1381.20	36.00	AV	45	1.2	V	24.0	4.80	34.6	30.20	54	23.80	spurious
1381.20	34.59	AV	89	1.3	Н	25.2	4.80	34.6	29.99	54	24.01	spurious
1381.20	48.78	PK	45	1.2	V	24.0	4.80	34.6	42.98	74	31.02	spurious
1381.20	47.48	PK	89	1.3	Н	25.2	4.80	34.6	42.88	74	31.12	spurious

 $[*]With \ measurement \ uncertainty!$

DECALARATION LETTER



Company Address: 3-255 Spinnaker Way, Vaughan, Ontario, Canada L4K 4J1

Tel: 905.760.0226 Fax: 905.760.1403

Product Similarity Declaration

To Whom It May Concern,

We, NEUTRANO INC., hereby declare that our Product: Phone watch, Model Number: w600FB,w600,w900,w900B,w510,w518,w528,w520 are different from the Model Number: w960that was certified by BACL except the main board.

In addition, the difference among the model: w600FB (tested by BACL), w600, w900, w900B, w510, w518, w528 and w520 is model name due to marketing purposes

Please contact me if you have any question.

Signature:

Print Name: Gary Doman

Title: president

Date: 2009-12-24

***** END OF REPORT *****