

Re: FCC ID: A98-7N4S13A

Applicant: NEC Corporation of America

Correspondence Reference Number: 72993

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SAR measurement: need further clarification on what was tested; these appear to some incorrect measurements. need more detail info on the area and zoom scan resolutions and demonstrate if it is sufficient to provide antenna positions and hot spots info; need further clarification on impact to measurement uncertainty budget and impact on the interpolation and extrapolation algorithms used by the SAR system.

Please note that area scans covered the whole device, to ensure the peaks were captured in the SAM phantom. Also, zoom scan resolutions were able to capture the peaks found in the PCS band (no sharp peaks observable).

The phenomena is typically observed for devices that primarily operate on 800 MHz overseas (for example), but are also capable of roaming in the USA on PCS 1900 MHz (but are not optimized for antenna performance), and hence do not exhibit typical antenna radiating patterns.

The circuit description indicates that only one antenna is built in the device for both bands. Please see the operational description for further details regarding operating bands and transmitter information.