

Re: FCC ID:

A98-7N4S13A

Applicant:

NEC Corporation of America

Correspondence Reference Number: 73423

Date of Original E-mail:

08/21/2009

You need to explain the reason for the double hot spot in your SAR plots; how many transmitters does the device have? Is the double hot spot from BT.? You might need to follow simultaneous Transmission procedures. Thanks

Please note that this device has a licensed transmitter (i.e. PCS) and Bluetooth transmitter. However, for SAR evaluation, only the licensed transmitter is required to be evaluated in a standalone configuration (see Page 19/26 of the SAR Report for analysis for standalone secondary transmitters and analysis for determination of the applicability of simultaneous transmission, per KDB 648474).

The double hot spot is not due to a second transmitter, but because the antenna is used for both 800 MHz (non-USA operations) and 1900 MHz (US operations).

Because of the physical nature of different wavelengths operating on a fixed antenna length within the device, variations of peaks in the hotspots are to be expected for SAR – this is a known phenomenon.