

To: Philip Hardt
Philip.Hardt@fcc.gov

From: Nobuo Tanaka
cs-comp@jp.sony.com

CC: Steven Halme

Date: February 17, 2010

Re: FCC ID: AK8PRS900

In response to the correspondence sent 02/03/2010, please be advised as follows:

1. *The radiated power levels (ERP, EIRP) listed on the grant of equipment certification do not match those in the test report submitted for this filing. The e-Reader in this filing uses the modular transmitter VV7-MBMF3507G. The original test report for VV7-MBMF3507G was submitted in this filing, without any additional or new test results. The power measurement results in this test report disagree with those listed on the grant and some appear to be significant. These discrepancies must be addressed and resolved by the TCB. There are also discrepancies between the average conducted output power in the (EMC) test report (for the VV7) and those reported in the SAR report. The average conducted power discrepancies must be addressed to support the SAR results.*

ANSWER: The TCB has advised Sony that it is posting a revised SAR test report (Rev 3 Dated 02/08/2010) with minor updates to output power. The test lab together with Ericsson has advised that the output power is within the tune up procedure of the module. Additionally, the test lab together with Ericsson has advised that the HSPA power measurements may differ from the original filing due to firmware updates to correct MPR issues.

The TCB has advised Sony that the full radiated re-measurements were performed for the eReader and can be found under the exhibit "Test Report" under the file name "Radiated Test Report". The output power values that can be found in this report are the same values that can be found in the grant.

2. *TCB has been advised multiple times since October 2009 that if "location-based services" applies to this e-Reader, the corresponding grant condition may be included. There is no information in the filing that indicates there is location-based services support for this e-Reader. That part of the grant conditions should be removed.*

ANSWER: The eReader device does not offer support for location-based services. The TCB will update the grant conditions so that this grant condition has been removed from the grant as of the date of this filing.

3. *The grant conditions indicate the device has additional transceiver functions that are not operable in U.S. territories. The user manual seems to have conflicting information identifying that the wireless functions are only applicable for use in the U.S. These discrepancies must be addressed by the grantee and reviewed by the TCB. The grant conditions, manual and actual device function must match.*

ANSWER: The eReader does not have transceiver functionality outside of the U.S. The TCB will remove any reference to any such additional functionality from the grant conditions as of the date of this filing. The user manual is also being updated as appropriate to remove any reference to wireless functionality outside of the U.S. The updated version of the user manual will be version 14, and a draft of this version 14 shall accompany this response.

4. There is a grant condition restricting this e-Reader to operate with a specific cover (PRSA-ZC9) supplied with the product to satisfy RF exposure compliance. The question about how many e-Reader covers are shipped with the product has been raised since October 2009 through the PBA associated with this filing. There has been no direct answer regarding this simple question until late December 2009 that indicates two covers have been shipped with the product. The questions about how many e-Readers have been shipped with the other unapproved cover and whether it is still being shipped remains unanswered or unclear. This is totally unacceptable. While the SAR report and user manual might have been revised; however, they do not support the fact that two covers are shipped with some or all products and RF exposure compliance has been demonstrated for only one specific cover (PRSA-ZC9). The information presented in the revised user manual remains unclear about what the user must do with these covers. While responses in the PBA have mentioned the other cover should be discarded, this has not been identified in the manual. The language in the manual must clearly identify these covers by specific part numbers and telling users how to remove and discard the other cover before using the e-Reader to satisfy RF exposure compliance. It should also explain to users that this other cover may be discontinued and not included in certain e-Readers etc., so that there is no confusion.

ANSWER: The number of actual units shipped is confidential Sony information that Sony is unwilling to disclose in this document in that Sony understands it may become a public document that would be available to our competitors, but Sony is willing to disclose this information directly to the FCC on a confidential basis during the in-person meeting at the FCC lab to be scheduled for the week of February 22, 2010, as discussed. With each device shipped to date, the original cover and the PRSA-ZC9 have each been included. The user manual included with these shipped products did include instruction on p. 15 for removing the original cover and replacing it with the PRSA-ZC9 for meeting RF exposure guidelines. However, to supplement, Sony will contact all registered end users via email with more specific instruction on the use of the PRSA-ZC9 along with the updated user manual (version 14, described above) and as further discussed in this response.

5. A copy of the user manual has been submitted in Exhibit 12 (technical description) to provide technical information for the e-Reader; however, the version of the manual in this exhibit is not the same as that in the manuals exhibit. Since the differences between these two manuals can raise issues, the same manual must be included in both exhibits.

ANSWER: For the user manual in Exhibit 12 supporting the technical description and the manual in the manuals exhibit, each is updated to version 14 of the user manual by the TCB.

6. The Caution Statement included in the revised manual is unacceptable. It must clearly identify to the users that if an additional cover is shipped with some earlier e-Readers, it must be removed and discarded because the product is only approved for use with the specific cover with part number

PRSA-ZC9 included with the e-Reader. While a different cover is illustrated in the manual, the only cover that is approved for use to satisfy RF exposure compliance is the one with part number PRSA-ZC9. This caution statement must appear before the Table of Content, in large fonts on a separate page.

ANSWER: This Caution Statement advising consumers to use the PRSA-ZC9 cover has been placed in version 14 of the user manual as requested. With respect to discarding the cover, Sony wishes to discuss alternatives with you in the meeting to take place the week of February 22, 2010.

7. On page 12 of the manual, item #18, revise as follows: If the e-Reader is shipped with an additional cover, it must be removed and discarded and replaced with the supplied cover with part number PRSA-ZC9 to meet RF exposure compliance.

ANSWER: The item described above has been revised in version 14 of the user manual advising consumers to remove the cover as requested. With respect to discarding the cover, Sony wishes to discuss alternatives with you in the meeting to take place the week of February 22, 2010.

8. The section on page 159 in the manual that describes how to attach the unapproved cover that is not a part of this filing must be removed. While procedures to remove it are applicable, there is no need for the user to re-attach this unapproved cover.

ANSWER: With respect to procedures for re-attaching the cover, Sony wishes to discuss alternatives to discarding the cover in the meeting to take place the week of February 22, 2010. In the draft of version 14 of the user manual submitted with this response, Sony has indicated that consumers may want to utilize the original cover for protection of the display solely when the wireless functionality is disabled.

9. There is a page in the manual with a "Precautions" statement that indicates the FCC statement on that page only applies to the model for sale in the U.S. and other versions may not comply with U.S. regulations. However, on page 184, it is indicated that wireless connectivity is only available in the U.S. within the service coverage area. On page 185, users are advised to turn off the wireless features outside the U.S. and to not use wireless features in other countries. On page 197, the manual identifies that WWAN only supports operations in the 850 and 1900 MHz bands; i.e. U.S. bands only. The grant identifies the device has additional transceiver functions not applicable to the U.S. These statements are unclear and could be in conflict, and must be revised accordingly.

ANSWER: The eReader does not have wireless functionality outside of the U.S. The user manual version 14 is modified to remove any reference to possible functionality outside of the U.S. Users are advised to turn off the wireless functionality outside of the U.S as leaving the functionality on will unnecessarily drain battery power. The grant has been updated by the TCB as of the date of this filing to remove any reference to additional functionality.

10. On page 175, revise the RF exposure statement as follows: ... This equipment, when used with the supplied cover (PRSA-ZC9), complies with FCC ... This transmitter must not be used with another other covers, co-located or operating ...

ANSWER: The RF exposure statement is modified as requested in version 14 of the user manual.

11. *The attestation statement regarding MPR for HSPA indicates “For detailed data, please see SAR Test Report.” It is unclear what specific information has been included in the SAR report. Please identify the specific information in the attestation statement and upload a revised copy to the “Attestation Exhibit” and ask the TCB to supersede the old version in the cover letter exhibits.*

ANSWER: A revised attestation statement is included with this response as an exhibit. The TCB will supersede the prior version.

12. *The following questions that have not been addressed in the associated PBA must be addressed accordingly through this RT. An attestation statement is required to address these and should be uploaded to the Attestation Exhibit.*

12a. *How many of the unapproved additional cover have been shipped with the e-Reader?*

ANSWER: The original cover has been included with each device shipped as the device is manufactured with this cover in place (please also see number 4 above). As stated, the packaging also includes the PRSA-ZC9 with the instructions in the user manual to remove the original cover and replace it with the PRSA-ZC9.

12b. *When did or when will this unapproved cover be discontinued for inclusion with existing and future e-Reader?*

ANSWER: Sony wishes to discuss alternatives to discontinuing the original cover with you in the meeting to take place the week of February 22, 2010, as Sony believes that consumers may want to utilize the cover solely in situations when the wireless functionality is disabled.

12c. *What specific mechanisms is Sony using to inform users, who have received the older manual with no specific information on which cover to use, to meet RF exposure compliance? As proposed earlier by Sony, it will be acceptable to inform existing users through the e-Reader Book Store. However, the users must not be given the choice to ignore it. It can be a one time alert to identify the issues to users, along with a copy of the revised manual, when users access the e-Reader Book Store.*

ANSWER: Sony will contact all registered end users via email with messaging and a copy of version 14 of the user manual as described in this response. Sony will also post version 14 of the user manual on the Reader Store website and its eSupport website.

13. *Please include a separate statement to be uploaded to the RF exposure exhibit identifying why the SAR measurements for the different modes and bands are performed using the high or low channels. This might have been addressed through separate email outside of the PBA. It should be documented in the filing. Due to multiple emails inquiries from a separate agent of Cetecom in Japan regarding this filing while the responsible Cetecom TCB is based in Germany, this might have caused unnecessary confusions among various parties handling this filing. Please note that all further correspondences for this filing must be addressed through the equipment certification system.*

SONY

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ANSWER: The TCB has advised Sony of the following:

1. According to KDB 447498 D01 Mobile Portable RF Exposure v04, the measurements in the current SAR test report (Rev 3. Dated 02/08/2010) that can be found on the FCC database are performed for the highest output power channels of each band and technology.
2. There is no need to test further channels according to these guidelines, since no measured SAR value was bigger than 0.8 W/kg.
3. According to the SAR Measurement procedures for 3G Devices, SAR measurements for UMTS ARM and HSPA were not performed, since the output power verification proved that the output power in this condition is less than ¼ dB higher than those of the 12.2 kbps RMC.
4. SAR measurements for EGPRS also weren't required, since the output power of EGPRS was proven to be less than ¼ dB higher than those of GPRS.
5. All these explanations can also be found in the SAR report on page 21.

BY: 

Nobuo Tanaka