



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

July 15, 2004

RE: NEC America, Inc.

FCC ID: AY5WLPS1EMH210

After a review of the submitted information, I have a few comments on the above referenced Application.

Administrative Issues:

- 1) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)). The block diagram provided appears to only be for the system. Please provide a block diagram for the TX portion.
- 2) Is a version of the back side of the main board available without the white keypad coating in place?
- 3) The sample label must contain the correct FCC ID. Please revise to include.
- 4) The schematics do not appear to contain the TX daughter board portion of the device. Please update to include or specifically show where this information may be found in the schematics.
- 5) FYI....This device does not appear to require a DoC under 15.101. Therefore, the DoC statement provided has not been reviewed.
- 6) FYI....The DoC note on the bottom of page 7 of the test report does not appear applicable.
- 7) FYI....This application will only cover the RF portion of the FCC requirements.

Technical Issues in EMC report:

None

Technical Issues in SAR report:

- 8) SAR report mentions 3 dBi gain antenna, while EMC mentions 0 dBi. Which is correct. Please adjust exhibits as necessary to correct.
- 9) Page 15 of the SAR report mentions a GSM base station was used to control the output power. This device is not GSM compatible. Please adjust to correctly describe how the device was manipulated during test.
- 10) All the data tables for body configuration mention it was tested with headphones, but photographs only show conditions without headphones. Test photographs and data tables should be provided for all tested configurations. Tested configurations should agree with all conditions expected. Please explain/correct as necessary.
- 11) Test photographs should include all test positions (left/right, left tilt, right tilt, etc.). Please include.
- 12) Page 14 of the SAR report mentions 1.5 cm spacing, but it appears this performed at a different spacing. Please correct/clarify.
- 13) The data tables for Head position should clearly identify which positions are "tilt" positions.
- 14) The data tables for Body position should clearly identify positioning of the equipment (i.e. front, bottom, etc.) along with the separation distance.
- 15) It appears that all positions tested for body have not been reported in tabular format. Please correct.
- 16) Incorrect Dipole calibration information was provided. We could not verify that Permittivity and Conductivity on page 23 were within the 5% specified during the dipole calibration.
- 17) Conversion Factors for the probe MUST be shown on all plots. Additionally, the probe calibration information on the validation plots (4.6, 4.6, 4.6) and page 6 does not appear to agree with calibration information (4.5, 4.5, 4.5). It appears that either the incorrect calibration information has been provided, or the results may not have been properly adjusted during the test.

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- 18) Because the incorrect dipole calibration information was provided, information given on page 26 could not be verified, such as the required SAR values. However it is not typical to see that the required SAR value is the same for both Head and Muscle tissue.
- 19) The measured SAR for the verification on page 26 does not agree with the validation plots provided.



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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.