

From: tim.dwyer@ccsemc.com

Sent: 2008/11/20 (木) 11:04

To: Thu.Chan@CCSEMC.COM

Cc: tim.dwyer@ccsemc.com; Claire.Hoque@ccsemc.com; mika.kaneko@ccsemc.com

Subject: Nihon Kohden Corporation, FCC ID: B6BZM-941PA, Assessment NO.: AN08T8606, Notice#1

Hello Thu,

Review of this application is complete. Please reply to the following issues.

Q1: The application information specified FCC Equipment Code FRF. This Equipment Code is for use with devices approved under Part 95A or 95B. The correct Equipment Code for this device should be from the TNx series and will be changed based on the reply to Q2 & Q3 below.

Q2: The Equipment Code entered (FRF) is for a transmitter held to the face. This transmitter does not appear to be a held to face type device, however one of the usage positions described in the user manual places the device on the bed in proximity to the face. Please provide additional information describing whether this device should be considered as a TNF "Transmitter Held to Face" or as a TNB "Transmitter Worn on Body".

<Sunny>: This device should be considered as a TNB "Transmitter Worn on Body" because it is worn on body or placed on a bedside.

Q3: The SAR report does provide any rationale for selection of the tested position. Although it appears the tested position could be the worst case position, it is not immediately apparent that it is consistent with the either of the typical usage positions as shown in the user manual on pages 35 and elsewhere. Please provide a brief statement describing selection of the SAR test position.

<Sunny>: Selection of the test position was based on the location of the antenna. When worn on the right arm, that portion of the transmitter will have the antenna closest to the body. This should cover the placed on a bedside configuration as well.

Q4: The user manual describes use of either NiMH or Alkaline batteries. The Radio and SAR reports are not specific as to the type of battery used or if possible effects of battery type/voltage were considered or evaluated in preliminary testing or final testing. Please provide a statement describing the type(s) of battery tested and a rationale on which selection of the selected battery type(s) was based.

<Sunny>: Preliminary testing was done using both NiMH and Alkaline batteries. There was no affect on the SAR values measured. Alkaline batteries were used in all testing.

Q5: Please provide a statement reference the Peak Limits shown in the tables on pages 27 and 36 of the test report. Limits in Part 95H are specified in terms of Avg and QP. There does not appear to be a limit for peak emissions specified in either 95H or Part 2 Subpart J. If the peak measurements are for reporting purposes only that is acceptable, but please confirm the basis for the limits shown in the table.

ANS: ??.

Revised report will delete unnecessary measurements.

Q6: Conducted power measurements in 1427.025-1431.975 Mhz are reported at 6.95 dBm = 0.005 W. The application form lists 0.001 W. Please advise if the power shown on the application form should be revised to show 0.005 W. Also see Q7 following.

[Yes, Application form should be revised to reflect 0.005 W output power](#)

Q7: The upper band-edge for operation under part 95H is 1431.5 Mhz. The application form and test report show operation above 1431.5 Mhz. It appears from the user manual that the highest channel of operation within this range would be 1431.4750 or 1431.4875 depending on the emission bandwidth. Please provide additional explanation, revised docum!

ents as needed, and advise how the application form frequency range and power should be revised.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.


Best regards!

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-

Tim Dwyer

Technical Reviewer

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