Chris Harvey

From: Claire Hoque [claire.hoque@ccsemc.com]

Sent: Tuesday, August 18, 2009 5:03 PM

To: Chris Harvey; Chris Harvey -TCB

Cc: Tina Chu

Subject: answer for CCS# 09U12756: Qualcomm Incorporated, FCC ID: J9CGOBI2000-H, Assessment NO.:

AN09T9461, Notice#1

Importance: High

Attachments: image001.png; image002.png; image003.png; HP-Bixby_OET65_RSS102(rev01).zip; 80-VP948-

9_A_Collocated_RF.pdf; HSTNN-I70C_System Label needs CMIIT.pdf; Bixby1.1-G2K KDB.pdf; RE_

Response to Inquiry to FCC (Tracking Number 266050).pdf

Hi Chris,

Pls see client's answer.

FCC Comment: 1. The SAR report does not provide any documentation of the construction, material type, model number, etc. of the laptop Device holder (shown in the SAR photos) used during the SAR measurement. Please update the SAR report accordingly.

Qualcomm response: A revised report is attached with requested information.

<u>FCC Comment</u>: 2. Please update the SAR measurement report to document the LCD Screen size of the host computer in order to justify using the Laptop SAR measurement guide of the FCC (defines full size Laptop as 12 inch screen or greater).

Qualcomm response: The HP HSTNN-I70C ("Bixby") netbook has a screen size of less than 12". KDB 266050 was filed in order to request permission to test the host in accordance with KDB 616217. The KDB query and FCC response is attached. Please note that in lieu of simply granting permission to reference KDB 616217, the FCC response provides a set of procedures that effectively supplant the need for the reference. I have included also an email exchange with the FCC to clarify the intent of the initial response.

<u>IMPORTANT</u>: Please do not include the KDB, the response to the KDB, or the subsequent email exchange in FCC uploads or as part of FCC correspondence as it is company confidential.

FCC Comment: 3. The Output Power Verification measurements documented in the SAR report do not seem to comply with the FCC KDB #941225 D01 & D02 'SAR Guidance for 3G Devices' and 'SAR guidance PBA for 3GPP R6 HSPA' operation. The SAR report does not indicate that power measurements have been performed in accordance with 3GPP TS 34.121 procedures.

<u>Qualcomm response</u>: The attached revised report provides requested information with reference clearly documenting that 34.121 test procedures were followed.

FCC Comment: You have not documented all of the required power measurements in all physical channels

<u>Qualcomm response</u>: Qualcomm rechecked the test report and verified all of the HSPA configurations have been measured. Please clarify what is believed to be missing.

FCC Comment: If you have already requested SAR test guidance for this device

from the FCC, please provide the KDB reference number for this guidance. Since this application requires Permit But Ask (PBA) filing, we must reference the test guidance KDB number used for performing the test when we submit the PBA filing.

Qualcomm response: See KDB discussion above under comment 2.

<u>FCC Comment</u>: Please also document the Maximum Power Reduction (MPR) target levels as well as the measured MPR numbers. If the measured values deviate from the target values, please provide justification in the SAR report.

<u>Qualcomm response</u>: Provided below are HSPA power reduction data for Gobi2000 module level values as documented in the J9CGOBI2000 filing, SGS-provided data, and a MPR comparison table. Please refer to the Gobi2000 Tune-up Procedure for additional information.

Thanks.

Claire Hoque

Compliance Certification Services 47173 Benicia Street Fremont, CA 94538, USA Tel: (510) 771-1123

Fax: (510) 661-0888

----Original Message-----

From: Chris Harvey [mailto:charveyemc@gmail.com]On Behalf Of Chris Harvey

Sent: Friday, August 14, 2009 10:08 AM

To: Claire Hoque; Thu Chan

Subject: FW: Qualcomm Incorporated, FCC ID: J9CGOBI2000-H, Assessment NO.: AN09T9461, Notice#1

Dear Thu and Claire,

You are listed as the Technical Contact for the above referenced TCB application. The following items need to be resolved before the review can be continued:

- 1. The SAR report does not provide any documentation of the construction, material type, model number, etc. of the laptop Device holder (shown in the SAR photos) used during the SAR measurement. Please update the SAR report accordingly.
- 2. Please update the SAR measurement report to document the LCD Screen size of the host computer in order to justify using the Laptop SAR measurement guide of the FCC (defines full size Laptop as 12 inch screen or greater).
- 3. The Output Power Verification measurements documented in the SAR report do not seem to comply with the FCC KDB #941225 D01 & D02 'SAR Guidance for 3G Devices' and 'SAR guidance PBA for 3GPP R6 HSPA' operation. The SAR report does not indicate that power measurements have been performed in accordance with 3GPP TS 34.121 procedures. You have not documented all of the required power measurements in all physical channels If you have already requested SAR test guidance for this device from the FCC, please provide the KDB reference number for this guidance. Since this application requires Permit But Ask (PBA) filing, we must reference the test guidance KDB number used for performing the test when we submit the PBA filing. Please also document the Maximum Power Reduction (MPR) target levels as well as the measured MPR numbers. If the measured values deviate from the target values, please provide justification in the SAR report.

Please also note that the Host Regulatory Compliance Label did not include any FCC

labeling requirements for the Modules installed, or any guidance on finding the embedded label. Please ensure that this information is being provided to the OEM installer of this module, as documented in the original filing.

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,

Chris Harvey