From: tleung@itslabtest.com

Sent: Monday, October 21, 2002 2:52 AM

To: MKUO@CCSEMC.com

Subject: RE: Giant Electronics Ltd., FCC ID: K7GN4000, AN02T2250

Hi Mike,

How are you?? Any update??

Tommy.

----Original Message----From: Tommy Leung ITS/ES-HKG

Sent: Wednesday, October 16, 2002 2:04 PM

To: 'Mike Kuo'

Subject: RE: Giant Electronics Ltd., FCC ID:K7GN4000, AN02T2250

Hi Mike,

Noted and Thanks.. We do understand your situation and please keep me update.

In addition, I would like to know any test lab can provide SAR test for 2.4GHz without these problems. We have another cordless telephone that need SAR test and will be submitted to your side for review.

Looking forward to hearing from you soon.

Thanks and best regards, Tommy.

----Original Message----

From: Mike Kuo [mailto:MKUO@CCSEMC.com]
Sent: Wednesday, October 16, 2002 10:00 AM

To: 'tleung@itslabtest.com'

Subject: RE: Giant Electronics Ltd., FCC ID: K7GN4000, AN02T2250

Hi Tommy:

The SAR report is the reason for causing the delay. As demonstrated in the SAR report, there are too many justifications made during the tests. OET 65 Supplemental C has been published for more than a year. When FCC reviews our SAR report for 2.4GHz devices in the past, FCC does not allow us to use the liquid other than 2.4GHz. You can not use head liquid to measure body SAR. These procedures are not complied with OET 65 Supplemental C. FCC may have authorities to allow such justifications, TCB authorities is very limited and monitored by FCC.

I sent out SAR report review questions to FCC on Oct. 11. Ask the Commissions for guideline. So far I have not received any information from FCC yet. I will keep you update.

Best Regards

Mike Kuo

----Original Message----

From: tleung@itslabtest.com [mailto:tleung@itslabtest.com]

Sent: Tuesday, October 15, 2002 3:42 AM

To: MikeKuo@CCSEMC.com

Subject: RE: Giant Electronics Ltd., FCC ID:K7GN4000, AN02T2250

Hi Mike,

Please advise the status of these applications.

Thanks and best regards, Tommy.

----Original Message---From: Tommy Leung ITS/ES-HKG

Sent: Thursday, October 10, 2002 7:43 PM

To: 'Mike Kuo'

Subject: RE: Giant Electronics Ltd., FCC ID:K7GN4000, AN02T2250

Hi Mike,

I have sent these files through "Add attachment" and please let me know if you need any other information.

In addition, I would like to know whether your side can perform SAR test on 2.4GHz Cordless Phone or not. Or any SAR test lab you prefer for avoiding the problem of SAR report review in the future.

In fact, we used the same SAR report of EMC Technologies for our previous application and it has been certified by FCC.

In my opinion, it may due to the power of phone was extremely low when compared with the permitted SAR limit. And therefore, please accept these reports and you may discuss with FCC.

Looking forward to hearing from you soon.

Best regards, Tommy Leung Asst. Supervisor

Intertek Testing Services Hong Kong Ltd.

ETL SEMKO

Tel: 852-2173 8538
Pager: 852-7302 3113
Fax: 852-2741 1693
tleung@itslabtest.com
www.etlsemko.com

----Original Message----

From: Mike Kuo [mailto:MikeKuo@CCSEMC.com] Sent: Saturday, October 05, 2002 9:45 AM

To: 'tleung@itslabtest.com'

Subject: FW: Giant Electronics Ltd., FCC ID:K7GN4000, AN02T2250

----Original Message----

From: CERTADM

Sent: Friday, October 04, 2002 6:41 PM

To: 'mkuo@ccsemc.com'

Subject: Giant Electronics Ltd., FCC ID: K7GN4000, AN02T2250

Notice content

EMC and SAR :

Question #1: The max. measured conducted output power as documented in 15.247 report is 96mW. However, the page 4 of SAR report indicates the max. conducted output power is 132.7mW. Please explain the discrepancy in output power.

SAR Portion:

Question #2: Page 3 of SAR test report indicates the device category is mobile transmitter. Please correct the device category to portable transmitter per section 2.1093 definition.

Question #3: Please provide system validation plots. System verification frequency(s) must be within \pm 100 MHz of device center frequency(s) per page 43 of OET 65 Supp.C. In accordance with SAR report, 1800MHz frequency was used during system validation tests. Per OET 65 suppl C reporting requirement, please list the date and temperature /humidity that system validation was performed.

Question #4: Please normalize measured SAR value during system validation test to 1W forward power and compare the value with reference SAR value for reference dipole in Table 7.1 of P1528.

Question #5: Apparently the only 2400MHz head tissue was used for head and body measurement. Please explain the reason why body tissue was not used for body worn SAR measurement.

Question #6: Please submit printout/raw data from dielectric parameter measurement system.

Question #7: Updated uncertainty budget using the draft P1528 template Table E6.1.

Question #8 Measurement of device transmit power "before and after" the SAR test to demonstrate that the unit was transmitting at maximum power. (OET 65 Appendix D requirement).

Question #9:Z axis scan plots taken at the highest SAR location for each test.

Question #10:Please provide probe calibration factor for 2.450GHz body.

Question #11: Please explain the reason that Crest factor of 8 was used for head and body measurements.

Question #12: This device was not tested with headset connected to the device per OET 65 Supp. C Appendix D requirements.

Question #13: Please list the Ambient and liquid temperatures during the SAR tests.

Question #14: What is the liquid depth that was used.

Best Regards

Mike Kuo / TCB Certifier

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 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.

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