

## Responses to TCB questions

> -----Original Message-----

> From: Barry C. Quinlan [[SMTP:certification@curtis-straus.com](mailto:SMTP:certification@curtis-straus.com)]

> Sent: Wednesday, October 25, 2000 1:58 PM

> To: Tom Tidwell

> Subject: MIVCDP06PS

>

> Dear Tom,

>

> Thank you for the Nextcell FCC registration application package. The  
> following points needs to be resolved:

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> 1. The part 15 report lists equipment which is significantly beyond its  
> one year calibration anniversary. Please explain.

[Tom Tidwell] The Test Equipment List was created from our database  
but it appears the spreadsheet links were not updated before the table was  
created. As a result current calibration dates were not pulled into the  
table. I have attached here a corrected report with the correct calibration  
dates.

<<0L0278RUS3PT15REPORT.pdf>>

>

> 2. For information only. We think that you have a misunderstanding in  
> applying the RF Exposure rules. You state that this device has a power  
> density of .25mW/cm<sup>2</sup> with a limit of .557mW/cm<sup>2</sup>. You point to the 30  
> minute averaging time allowed and then go on to derive a maximum  
> permissible exposure time of 67 minutes. According to OET 65 page 10  
> paragraph 4 and the continuance on the next page, the interval  
> represents a sliding averaging period. Thus this device with a  
> 0.25mW/cm<sup>2</sup> power density could operate forever without violating the  
> 0.557mW/cm<sup>2</sup> limit in any 30 minute period. The equation quoted works  
> for times less than the exposure averaging period, but cannot be  
> extended beyond the specified averaging period. Let's look at a  
> theoretic limit case to illustrate the point. Assume that we have a  
> medical transmitter on us for a period of weeks as we recuperate in the  
> hospital. Applying the equation as you have done would require that the  
> transmitter be of virtually zero power.

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> 3. We could not find a tune up procedure for this device. A tune up  
> procedure is required by 2.1033 (c) (9). Please supply it or explain  
> that the device is not tuned up after assembly.

[Tom Tidwell] The tune-up is performed with a software routine  
during manufacture. There is no manual adjustment requiring human  
intervention.

> 4. Please supply schematics.

[Tom Tidwell] Attached are the schematic files along with a request  
for confidentiality. The fee for the confidentiality can be charged to the  
same VISA card.

> <<confidentiality request.jpg>> <<SageDigital\_P3\_Sch.pdf>>

> <<SageDisplaySch\_11.pdf>> <<SageRF\_SCH\_all.pdf>>

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> Best regards

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> Barry C. Quinlan

> Certification Manager

> Curtis-Straus LLC

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