

- 1) In 9/3/08 SAR report we note USB position designations were changed compared to those in preliminary report, i.e. former horizontal.-down is now horizontal.-up, former vertical-left with cable is now called vertical-right with laptop, etc - Please ensure correct data has been reported and summarized for each position, or revise where appropriate

Response: We changed the USB position designations in the 9/3/08 SAR report according to Kwok's 8/8/08 comment on the earlier SAR report ("FYI: Horizontal-Up identified in the test report is the Horizontal-down position according to earlier test instructions provided by the FCC.") We confirm all the SAR data have been reported correctly in the 9/18/08 SAR report.

- 2) Preliminary SAR results showed GPRS higher than WCDMA (which follows power trends), however updated SAR shows GPRS much less than WCDMA - please re-test / revise where appropriate

Response: In an effort to further reduce the SAR, we reduced the output power in multi-slot GPRS mode. The output power in single-slot GPRS mode and WCDMA mode remained unchanged. As a result, the highest SAR was observed in WCDMA mode. The EMC test report has been revised accordingly and the detailed multi-slot GPRS output power results are on Page 5 of the revised EMC report dated 9/18/08.

- 3) Per 2.1033(c) (12) and to support SAR evaluation, please submit internal photos also showing circuit board within chassis / housing assembly, and indicated locations of all antennas

Response: Additional internal photos showing the circuit board and antenna locations within the housing assembly have been uploaded.

- 4) FCC 3G SAR procedures are intended for devices which implement MPR, and for which depending upon details of implementation within a device and correct device setup then power reductions of up to 2 dB are expected in HSUPA subtests 2-4; please explain hardware/firmware details of MPR implementation within this device, and/or revise HSPA power test results (and related exhibits) where appropriate using valid device setup

Response: We noted an error in the test reports containing the UMTS power data. The test reports have been corrected and uploaded. Sorry for the confusion.

- 5) You may consider one of the following options to place the Caution Notice on the device or propose language that is equivalent to these. The font should be the same or larger than the FCC ID. A copy of the label and its location on the device should be fully identified in the certification filing. 1. See RF Exposure Caution Notice 2. RF Exposure Caution Required 3: Caution: See RF Exposure Notice With reduced information on the device label (due to space on typical USB devices), a pamphlet insert is also necessary. The following information should be included in both the pamphlet and manual instructions; with more detailed descriptions and explanations in the manual. Identify in manuals instructions and the RF Exposure Caution Pamphlet that this USB modem is approved for use in normal size laptop computers only (typically with 12" or larger display screens). To comply with FCC

RF exposure requirements, this modem should not be used in configurations that cannot maintain at least xx mm (approximately xx inch) from users and bystanders; for example, in certain laptop and tablet computers and configurations where the USB connectors on the host computer are unable to provide or ensure the necessary separation between the modem and its users or bystanders to satisfy RF exposure compliance requirements. If it is just the horizontal orientation that is seldom implemented on most laptop computers that requires a larger distance, you may identify that configuration (with a diagram and clear explanation) with a larger distance and use the largest test distance for the other orientations. The users should be advised to see details in the instruction manual. A copy of the Pamphlet should be included in the filing. The manual instructions should clearly explain the proper antenna swivel requirements in the various USB connector orientations to maintain RF exposure compliance.

Response: The device label and the user manual have been revised and submitted according to the latest comments from the FCC. A pamphlet containing the suggested RF exposure warning has also been submitted.

- 6) 6) Radiated power results do not appear to correspond to original listings on Form-731 - please provide update for requested Form-731 line entries.

Response: The power output entries on Form 731 have been updated and a short-term confidentiality release date has been added. Please note the output power listed in Form 731 are the conducted power results because the device has an external antenna port and in the future we may file Class II permissive change application to add different antennas to the certification. This is consistent with our previous FCC filings. Normally our FCC grants list the conducted power results. The radiated power results are included in the grant note.