

Mike Kuo

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**From:** Claire Hoque  
**Sent:** Wednesday, September 30, 2009 10:23 AM  
**To:** Mike Kuo  
**Cc:** Ron Hsu  
**Subject:** answer: Novatel Wireless, Inc., FCC ID: NBZNRMUNDP-1D, Assessment NO.: AN09T9625, Notice#1  
**Attachments:** MiniCooper ADDED antenna drawing.pdf

Hi Mike,

Pls see answer below.

Client is working on the PBA portion and will provide more details to us on that(Q#4).

Thanks,

Claire Hoque  
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-----Original Message-----

From: Mike Kuo  
Sent: Tuesday, September 29, 2009 2:27 PM  
To: Claire Hoque  
Cc: Thu Chan; Ron Hsu  
Subject: FW: Novatel Wireless, Inc., FCC ID: NBZNRMUNDP-1D, Assessment NO.: AN09T9625, Notice#1

Hi Claire:

Please address the following questions.

Question #1: As indicated in the Class II permissive change cover letter, the WWAN TX antenna is positioned more than 20 cm to the body of user. However, SAR evaluation was performed and included in this filing. Please explain the reason to perform SAR evaluation for the antenna-to-user is greater than 20 cm.

[ answer - As indicated in the attached antenna drawing the WWAN radio is located 13cm from the user].

Question #2: As indicated in the Class II permissive change cover letter, this WWAN data modem module is also co-located with QDS-BRCM1030, QDS-BRCM1031, E2K512ANHMW; and E2K533ANH. However, in the SAR test report, there is no RF exposure assessment provided to address co-located SAR evaluation requirements and simultaneous SAR analysis. Please provide co-located analysis with other radio modules in the SAR test report as require per KDB 616217.

[ answer - According to KDB 616217 when transmitting antennas are greater than 5cm from the each other the exposure is considered insignificant. (Page 5, 4th paragraph) KDB616217 further explains that if the antennas are less than 5 cm from each other than normal simultaneous transmission tests should apply.(page 6, 1st paragraph) As the transmitting anteenaa are greater than 5cm (27cm actual) the testing of this configuration would not apply. Please refer to the attached drawing.]

Question #3: Please provide location of WWAN/Main antenna within the host and the separation distance from WWAN/main-to-user. In addition, please provide all other transmitter antenna locations and distance to the user and the distance to the near by antenna.  
[ answer - See attached]

Question #4: This WWAN module is equipped with HSUPA which is subject to Permit-but-ask per KDB 941225. However, there is no information provided indicating the SAR evaluation has been endorsed by FCC during Non-TCB PBA process. If non-TCB has not yet submitted to FCC, please do so. TCB will not able to review this application until non-TCB PBA has been approved by FCC.  
[answer - Currently underway]

As indicated in the assessment folder, the desired grant date is Oct 02 which is not possible since PBA process has not yet finished.  
[answer - understood.]

Best Regards

Mike Kuo / CCS

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.