To: Stan Lyles

Stanley.Lyles@fcc.gov FCC Application Processing Branch June 29. 2007

Applicant:	High Tech Computer Corp
FCC ID:	NM8KS
Form 731 Confirmation Number:	EA740611
Date of Original E-Mail:	06/20/2007
Correspondence Reference Number:	33272

Dear Mr. Lyles,

Below are the answers to your questions dated June 20, 2007 on the above referenced application. 1) Filing appears to have duplicate user manuals - one set submitted 5/11/07 and other set submitted 5/21/07. Can one set be deleted, and if yes which? **<CCS ANSWER:>** The user manuals submitted on 5/21/07 are the final versions. Please remove the 5/11/07 versions from the filing.

2) If not in filing already, regarding statement "results ... are for model KAIS120 ... unless it is mentioned" please explain how such results are applicable for other models in this filing.

<CCS ANSWER:> Here is an explanation of model differences: KAIS 110 has no camera while KAIS 100 has one camera and KAIS120 has two cameras. A full investigation of SAR evaluation is done on KAIS 120 and for each position & band, the worst case for KAIS 120 is re-evaluated for the other two models, KAIS 100 & KAIS 110 and results are included in the SAR report.

3) If not in filing already, please revise internal and/or external photos to show antenna positions and sizes. **<CCS ANSWER:>** Please see Antenna Photos document submitted with these answers.

4) Filing seems somewhat unclear whether device supports 3GPP Rel 5 or Rel 6. Please explain how SAR evaluation addresses below items from FCC 3GPP Rel 5 procedures, or if Rel 6 is applicable please explain based on corresponding items from FCC draft 3GPP Rel 6 procedures (jun07 FCC-TCB conf.-call).

WCDMA Handsets

- Output Power Verification

- - Results for all applicable physical channel configurations (DPCCH. DPDCH_n and spreading codes) should be tabulated in the test report.

- - All configurations that are not supported by the DUT or cannot be measured due to technical or equipment limitations should be clearly identified.

- Head SAR Measurements

- - SAR for head exposure configurations is measured using the 12.2 kbps RMC with TPC bits config! ured to all "1's".

- - SAR in AMR configurations is ! not requ ired when the maximum average output of each RF channel for 12.2 kbps AMR is less than 1/4 dB higher than that measured in 12.2 kbps RMC.

- - Otherwise, SAR is measured on the maximum output channel in 12.2 AMR with a 3.4 kbps SRB (signaling radio bearer) using the exposure configuration that results in the highest SAR in 12.2 RMC for that RF channel.

- Body SAR Measurements

- - SAR for body exposure configurations is measured using the 12.2 kbps RMC with TPC bits configured to all "1's".

- - SAR for other spreading codes and multiple DPDCH_n, when supported by the DUT, are not required when the maximum average outputs of each RF channel, for each spreading code and DPDCH_n configuration, are less than 1/4 dB higher than those measured in 12.2 RMC.

- - Otherwise, SAR is measured on the maximum output channel with an applicable RMC configuration for the corresponding spreading code or DPDCH_n using the expo! sure configuration that results in the highest SAR with 12.2 RMC.

- - When more than two DPDCH_n are supported by the DUT, it may be necessary to configure additional DPDCH_n for a DUT using FTM (Factory Test Mode) with parameters similar to those used in 384 kbps and 768 kbps RMC.

- Handsets with HSDPA

- - Body SAR is not required for handsets with HSDPA capabilities when the maximum average output of each RF channel with HSDPA active is less than 1/4 dB higher than that measured without HSDPA using 12.2 kbps RMC.

- - Otherwise, SAR is measured for HSDPA, using FRC, with the body exposure configuration that results in the highest SAR in 12.2 RMC for that RF channel.

<CCS ANSWER:> We used the corresponding procedures which are applicable to WCDMA handsets operating under 3GPP Release 99 and Release 5. For our SAR measurement, we followed the setup guidelines regarding WCDMA handset sections of the below documents.

1) SAR Measurement Procedures for 3G Devices (June 2006)

2) SAR Procedures Update (October 2006)

Attached please find the updated information which is Section 8 Procedure used to establish test signal in SAR report.

5) Please submit two separate test reports one for the Bluetooth and one for the WLAN for this filing. **<CCS ANSWER:>** Separate test reports are being submitted at the same time as this reply document.

Thank you for your time. If you have any further questions, please do not hesitate to contact me.

Best regards,

September Radecki Compliance Certification Services 47173 Benicia Street Fremont, CA 94538 Phone: 510.771.1090 Fax: 510.661.0888 September.Radecki@CCSEMC.COM