

Re:

Applicant: High Tech Computer Corp

FCC ID: NM8TITA100

Correspondence Reference Number: 32493

Date of Original E-Mail: 1/30/2007

Subject: FCC Equipment Authorization System

Dear Mr. Stan Lyles

Below are our responses, thanks.

1) User man. pg. 193 has the below statement, which is not consistent (incomplete) with OET 65 Suppl C Appdx D - please revise.

"Use of other accessories may not ensure compliance with the FCC RF exposure guidelines."

<Response> User man. Pg. 193 has been revised to read as below:

“For body worn operation, this phone has been tested and meets the FCC RF exposure guidelines when used with the High Tech Computer Corp. accessories supplied or designated for this product. Use of other accessories may not ensure compliance with FCC RF exposure guidelines. ”

2) If not in filing already, please give specific details for test procedures used to evaluate co-transmitting SAR.

<Response> The collocating SAR is obtained by using the post processing software supplied by the SPEAG in SEMCAD SAR measurement suit to add up SAR values one by one on the corresponding grids of worst measured SAR plot of each configuration in considering.

The EUT was carefully aligned to sit on the same test position during multiple frequency tests with same measurement grid size, so that the collocation SAR can be executed by the EMCAD.

For detailed software operation please refer to submitted “CRN 32488-93 Collocated SAR evaluation procedure.pdf “.

3) Please provide an explanation or description of all the held to ear-modes.

<Response> Please see below:

1.CDMA 850 ON

2.CDMA1900 ON

3.CDMA850 ON + WLAN ON

4.CDMA1900 ON + WLAN ON

5.CDMA850 ON + BT ON

6.CDMA190 ON + BT ON

4) Please provide an explanation of what modes 1 and 2 in the HAC test report.

<Response> The difference between mode1 and mode 2 is only appearance, the all other parts are same.

5) Please provide an exhibit of appropriate statements to allow users to make informed decisions about operation of the phone with their hearing aid and to explain the ratings on the package.

<Response> HAC required rating and paring info have been provided in the manual. Please refer to user manual P191 to P192 for detail.

6) The grant in the 824.12 to 848.76 band with 1M44F9W mode is 0.296 WATTS or 24.71 dBm. However the HAC test states maximum power at 23.25 dBm.

<Response> We have typos during translate dBm to Watt, the dBm is actual measurement value. The EMC report has been revised (P 7 , P17) and re-uploaded.

EIRP POWER (TDSO SO32)					
CHANNEL NO.	FREQUENCY (MHz)	RAW VALUE (dBm)	CORRECTION FACTOR (dB)	PEAK OUTPUT POWER	
				dBm	Watt
1013	824.12	-15.40	40.03	21.51	0.290
384	836.58	-15.74	40.32	22.04	0.287
777	848.76	-15.90	40.62	22.36	0.296

These values are correct These values are wrong
type error

According to p6 of “SAR Measurement Procedure for 3G device Version June 2006 “, the setting for head measurement is SO55 and hence the highest power setting in SO55 mode was selected for HAC test.

The highest conducted power of SO55 in page 16 or 22 & 24 EMC reports are 23.25 & 23.60 dBm respectively and are consistent with tested conducted powers in HAC report.

7) This device is also a Class B computer peripheral and tested to the Certification or Declaration of Conformity equipment authorization procedures under 15.101 (15 B). However, this is not reflected in the label exhibit.

<Response> FCC DoC logo was on the label (There might be pdf version incompatible, so you cannot see it). We have revise the pdf file and please let us know if you can find it this time.

8) The test report should not include results for the 802.11 only mode since it is not a requirement for HAC.

<Response> Although, the product does not support phone function by default with 802.11 mode, but in considering that end-user might installing third-party VoIP application on the product, so we have voluntarily submitted the 802.11 HAC test data.

9) However, It appears that 802.11 and Bluetooth modes may operate simultaneously when the device is held to the ear but test results only show results for 800 band and 1900 band with 802.11 (b/g) or Bluetooth.

<Response> The WLAN & Bluetooth share the same antenna and can not be turned on simultaneously in the design, hence 800 or 1900 band co-transmit with WLAN and BT configuration do not exist in this application. Please see our test note 10 on page 6 of SAR report.

Best regard,
Advance Data Technology Corporation