

Date: Tue, 9 Oct 2001 17:49:18 -0400 (EDT)
From: OET <oetech@fccsun07w.fcc.gov>
To: rscodell@qcpi.com
Subject: Request for additional information

To: Robert Scodellaro, Kyocera Wireless Corp
From: Martin Perrine
mperrine@fcc.gov
FCC Application Processing Branch
Re: FCC ID OVFKWC-2119
Applicant: Kyocera Wireless Corp
Correspondence Reference Number: 20868
731 Confirmation Number: EA102032

For EMC

In regards to your recent application referenced above we kindly request that you provide the following additional information.

1) A discussion of any provisions made in the EUT to comply with the Emergency 911 call standards from CFR 47 Section 20.18.

SAR

The FCC has standardized on Supplement C of OET Bulletins 65 which was recently updated. There are numerous changes that testing companies will need to address to fulfill this standard. In regards to your recent application referenced above we kindly request that you provide the following additional information.

1) A full list of accessories that can be used with this phone. It was noted from your web site that there are two possible body worn accessories that a customer could purchase with this unit. Please confirm that the belt clip that was tested provided the smallest body to phone gap and that none of the accessories contain metallic parts. Under these conditions the FCC only requires the testing of body worn accessory.

2) Power drift data referenced in section 6 of the test report.

3) Sketches and/or diagrams documenting the position of the EUT relative to the phantom during SAR test.

For your future use

The following contains additional Supplement C issues that you should be aware of.

1) It was noted that the probe calibration is past due. Proper probe calibration is essential. The probe must be calibrated to account for all critical parameters including frequency and tissue dielectric properties.

2) Air and tissue temperature should be made for each test?

3) A general discussion of how the measurement systems implements the measurements should be provided. The discussion should

include zoom scan procedure and how interpolation is performed to calculate SAR.

4) The report should contain a comprehensive calculation of measurement uncertainty, including a discussion and calculation of both individual components and total system uncertainty.

5) Appendix C contains a table of target tissue parameters. Test tissues parameters must be shown by measurement to be within 5% of these values.

6) Phantom liquid depth must be 15 cm or more, PER SUPPL C AND DRAFT IEEE STD 1528

-Liquid depth for all test configurations should be stated in the report.

-Photos, system verification data, SAR vs depth data (z-axis), or other means to demonstrate/verify liquid depth should be provided.

-If liquid is deep enough, plots of SAR vs liquid depth will show a smooth exponential-type roll-off, with no secondary or multiple humps, decreasing to 0 W/kg.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. 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.

RESPONCE

EMC

Q1) A discussion of any provisions made in the EUT to comply with the Emergency 911 call standards from CFR 47 Section 20.18.

A1) The 2119 is compliant with E911 requirement specified in CFR 47, Section 22.921. The following capture is taken from KWC-2119 compatibility software application notes.

FCC compliance Emergency 911

When an emergency 911 call is originated by the user, the mobile will attempt to acquire any available system and originate the emergency call on that system, disregarding restrictions set by the roaming list. The FCC NPRM WT99-13, CC94-102 automatic analog A/B roaming option has been implemented for 911 emergency calls. Note that the 2119 does not have Global Positioning System (GPS) support.

SAR

Q1) A full list of accessories that can be used with this phone. It was noted from your web site that there are two possible body worn accessories that a customer could purchase with this unit. Please confirm that the belt clip that was tested provided the smallest body to phone gap and that none of the accessories contain metallic parts. Under these conditions the FCC only requires the testing of body worn accessory.

A1) The two body worn accessories that can be used with the 2119 are the: 1) Belt Clip
2) Leather Case

Both of these accessories use the same clip (that attaches to the clothing), but the leather case holds the phone slightly further from the body, that's why the belt clip was used for the body worn measurements.

Q2) Power drift data referenced in section 6 of the test report.

A2) The following is the power measurements before and after each SAR test:

Brain

Channel	Power Before (dBm)	Power After (dBm)
25	22.78	22.87
600	22.76	23.06
1175	22.79	23.03

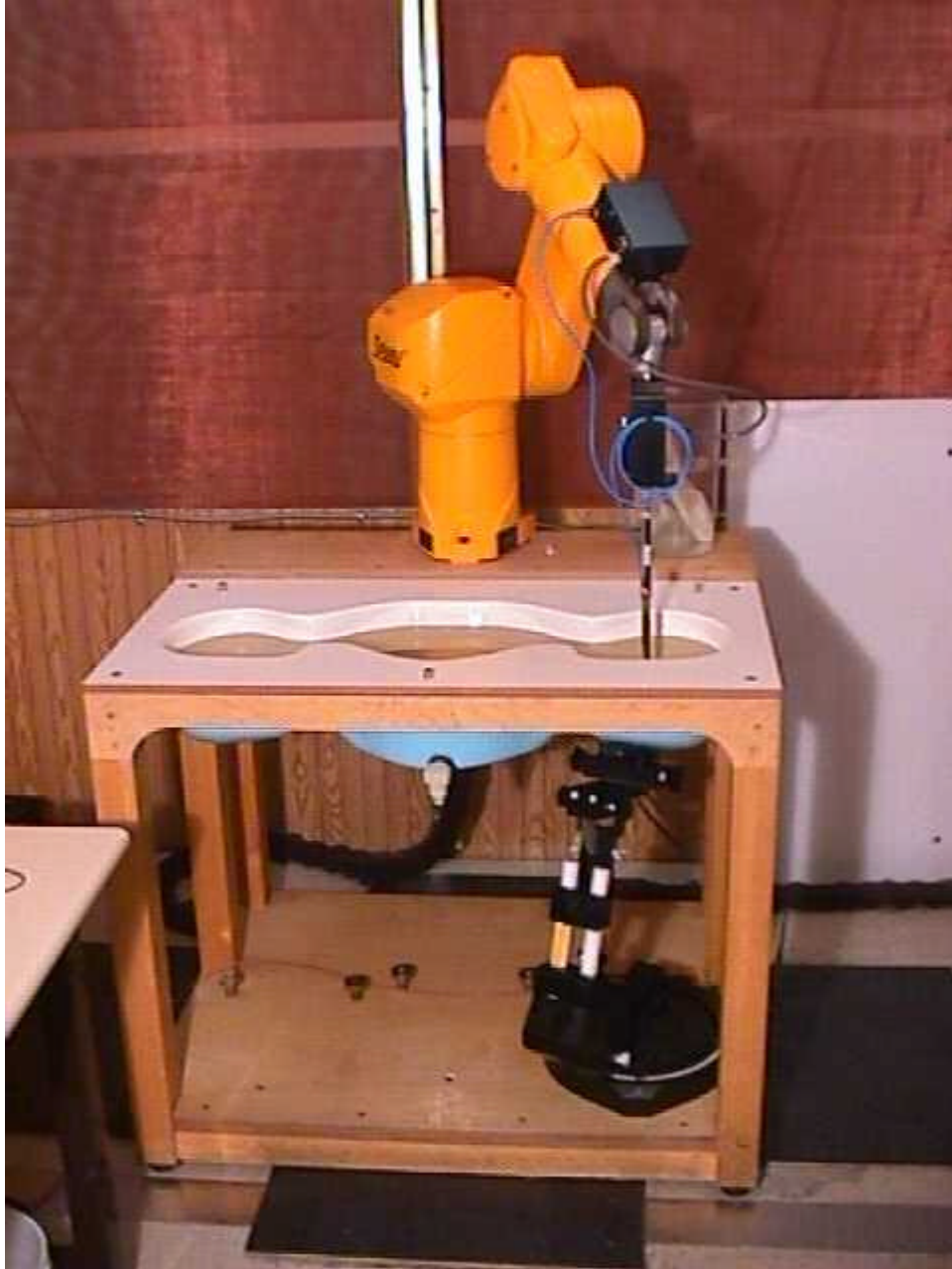
Muscle

Channel	Power Before (dBm)	Power After (dBm)
25	22.72	22.81
600	22.74	22.98
1175	22.73	22.95

Q3) Sketches and/or diagrams documenting the position of the EUT relative to the phantom during SAR test.

A3) Photos that document the position of the EUT for SAR tests for both brain and body worn applications were sent with the original submittal package. These photos are on the following pages.

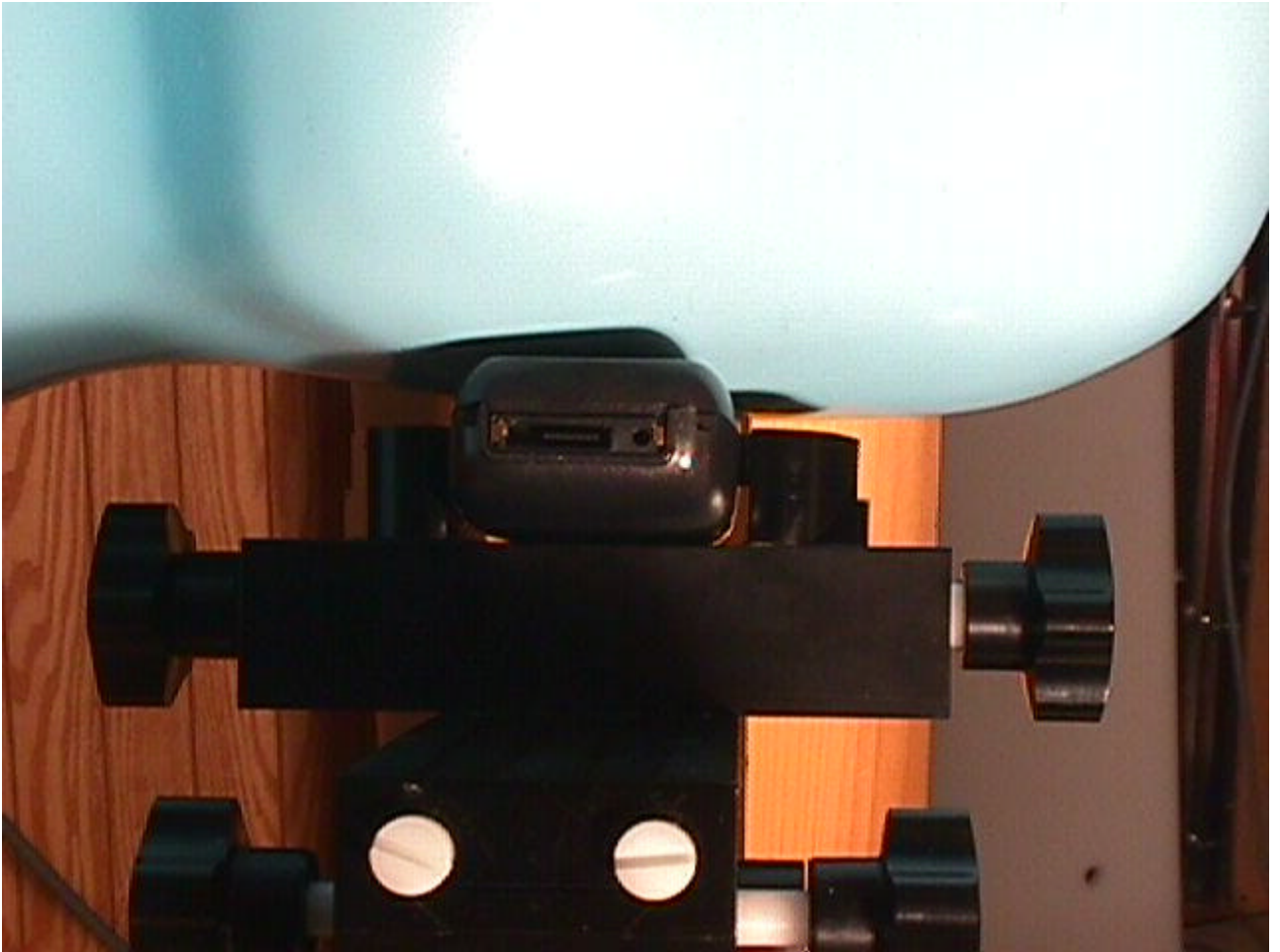
Test Setup for SAR at Head



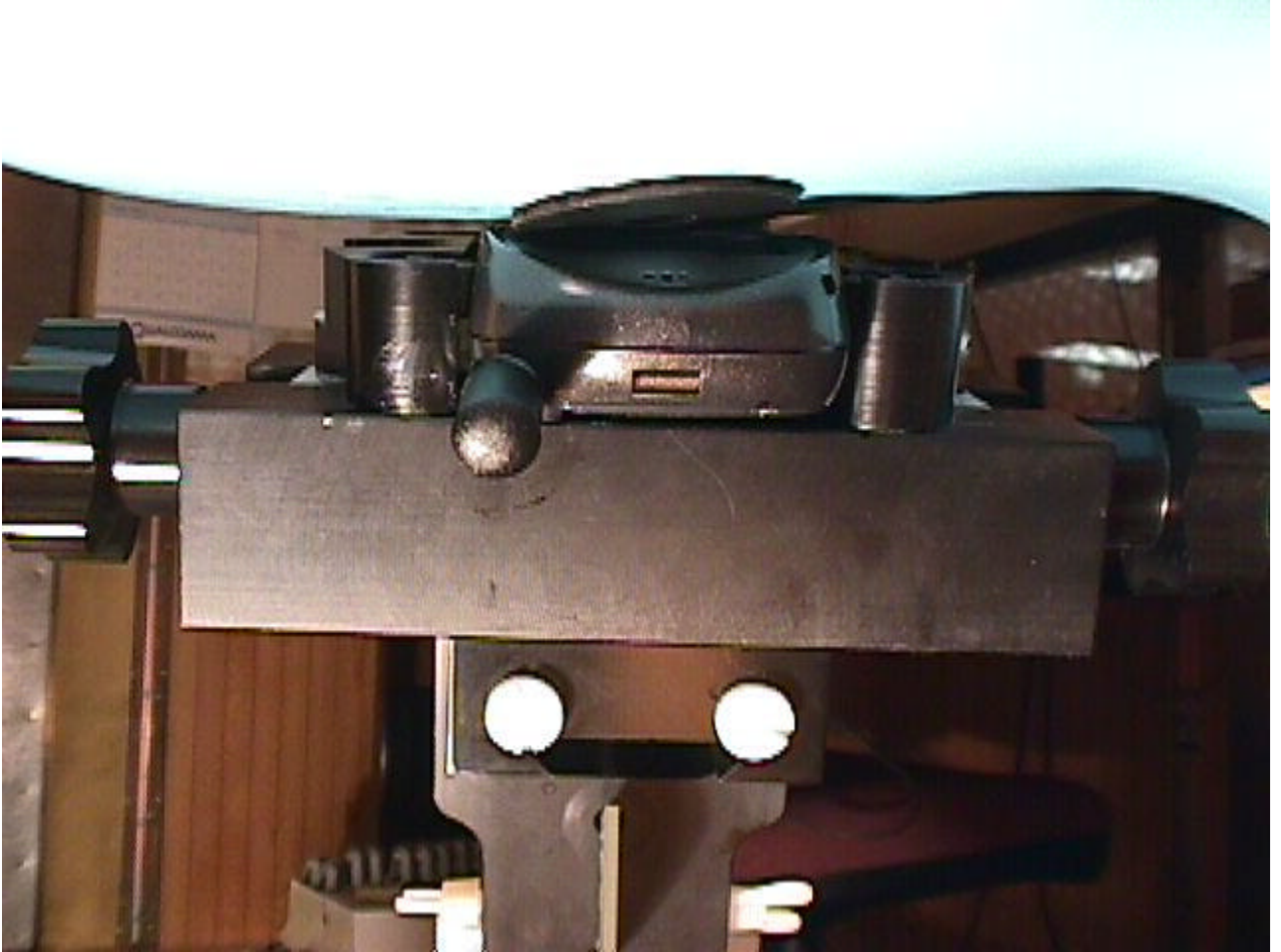
Test Setup for SAR at Head



Test Setup for SAR at Head



Test Setup for SAR at Head



Test Setup for Body-worn SAR



Test Setup for Body-worn SAR



Test Setup for Body-worn SAR



Test Setup for Body-worn SAR



Test Setup for Body-worn SAR



