

This document was generated in response to a request for additional technical information by Martin Perrine in regards to the type approval of the KWC-2235. The information included in related to the specific topics discussed in the following email received by Lin Lu on Nov. 19, 2001:

From: oetech@fccsun34w.fcc.gov
Date: Mon, 19 Nov 2001 15:01:12 -0500 (EST)
To: llu@qcpi.com
Subject: Request for additional information

To: Lin Lu, QCP, Inc. Representing Kyocera Wireless Corp.
From: Martin Perrine
mperrine@fcc.gov
FCC Application Processing Branch
Re: FCC ID OVFKWC-2235
Applicant: Kyocera Wireless Corp
Correspondence Reference Number: 21293
731 Confirmation Number: EA102451

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

Based on your 9 November response:

Please provide SAR test data using the same powers as those reported in the EMC report. This request is meant to bring consistency between the EMC and SAR reports addressing the .7 dB increase mentioned in the FYI below. Data for at least the worst case situation previously reported is sufficient i.e. PCS ch 25, brain, with antenna retracted SAR 1.4 W/kg. Please include Z-axis SAR scan data for this data at the point of the highest SAR value.

1) SAR result on PCS Ch25, with antenna retracted

Per the request, we set the phone at the conducted power of 22.5dBm and re-performed the SAR test on PCS ch25, with antenna retracted. The SAR result is 1.11mW/g. According to the previous response 5), the extended uncertainty (K=2) was assessed to be +/- 23.8%. Taking 23.8% uncertainty into account, it results in that the maximum SAR value averaged over one-gram is 1.38 mW/g (1.11mW/g +23.8%), which shows in compliance with FCC requirement even if the worst case uncertainty of the system has to be added to the assessed value.

The validation and SAR plots are attached in the proceeding pages.

1800MHz Validaiton 11-19-01, Target Value = 0.399 mW/g

SAR (1g): 0.389 [mW/g] \pm 0.02 dB, SAR (10g): 0.202 [mW/g] \pm 0.01 dB

Cubes (2) (Worst-case extrapolation)

Generic Twin Phantom; Flat Section

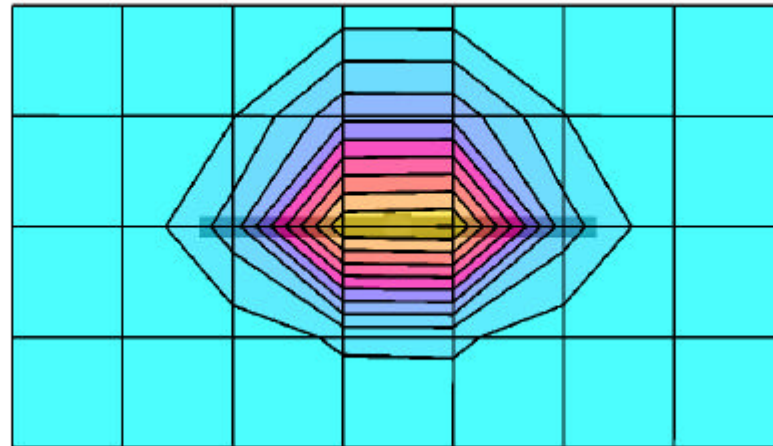
Probe: ET3DV5 - SN1353; ConvF(5.00,5.00,5.00)

Brain 1800MHz: $\sigma = 1.69$ [mho/m] $\epsilon_r = 41.0$ $\rho = 1.00$ [g/cm³]

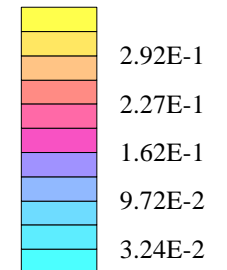
File Name: ValidationFlat 1800MHz 11-19-01.DA3

Operator: DWS

Powerdrift: 0.08 dB



SAR_{Tot} [mW/g]



KWC 2235, PCS Ch25, nominal conducted power = 22.5dBm

SAR (1g): 1.11 [mW/g] \pm 0.01 dB, SAR (10g): 0.567 [mW/g] \pm 0.04 dB

Cubes (2) (Worst-case extrapolation)

Generic Twin Phantom; Left Hand Section

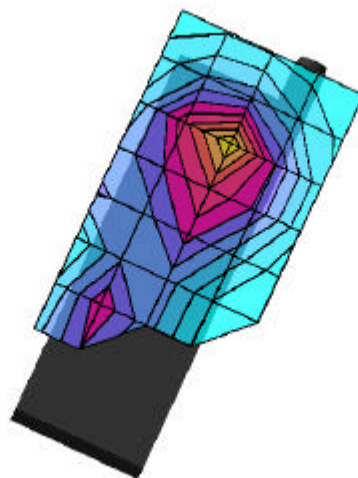
Probe: ET3DV5 - SN1353; ConvF(5.00,5.00,5.00)

Brain 1800MHz: $\sigma = 1.69$ [mho/m] $\epsilon_r = 41.0$ $\rho = 1.00$ [g/cm³]

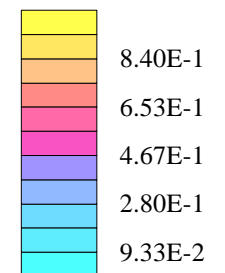
File Name: K1 P4A #1617, FCC Test, PCS ch25, conducted power = 22.5dBm 11-19-01.DA3

Operator: DWS

Powerdrift: 0.05 dB



SAR_{Tot} [mW/g]



KWC 2235, PCS Ch25, nominal conducted power = 22.5dBm, Antenna Ret., Z-axiz scan

()

Generic Twin Phantom; Section

Probe: ET3DV5 - SN1353; ConvF(5.00,5.00,5.00)

Brain 1800MHz: $\sigma = 1.69$ [mho/m] $\epsilon_r = 41.0$ $\rho = 1.00$ [g/cm³]

File Name: K1 P4A #1617, FCC Test, PCS ch25, conducted power = 22.5dBm 11-19-01.DA3

Operator: DWS

