This document is generated in response to the queries asked in the e-mail from Compliance Certification Services titled "Kyocera Wireless Corp, FCC ID: OVFKWC-KX13, Assessment NO.: AN05T4862, Notice#1". The queries asked in the e-mail received by CK Li on 27th of June 2005 are listed below followed by the response the questions.

X-BigFish: vpcs-25(z6cdjb7bjba6i519iz3117N128aO7efIH3116Jzzzzz2dh)
From: Compliance Certification Services <charvey-tcb@ccsemc.com>
To: "cli@kyocera-wireless.com" <cli@kyocera-wireless.com>
CC: "charvey-tcb@ccsemc.com" <charvey-tcb@ccsemc.com>
Date: Mon, 27 Jun 2005 10:54:45 (GMT)
X-mailer: AspMail 3.53 (QSMTC6B1AE)
Subject: Kyocera Wireless Corp, FCC ID: OVFKWC-KX13, Assessment NO.: AN05T4862, Notice#1
X-MIME-Autoconverted: from quoted-printable to 8bit by pandora.intra.kyocera-wireless.com id DAA16273

Dear CK,

I have reveiwed the above referenced TCB application and find that the following information is needed in order to complete the review:

The SAR Probe s/n:1713 calibration documentation indicates that the probe was calibrated on July 16, 2004, however the SAR distribution plots indicate calibration on 5/19/05 with slightly different calibration ConvF values. Please provide the most recent calibration documentation for the SAR probe.

Best regards,
Chris Harvey
charvey-tcb@ccsemc.com

Question #1: Please provide the most recent calibration documentation for the SAR probe.

The manufacture’s calibration documentation for the probe was misplaced in the initial submittal package. The most recent one is included in this response. Sorry for the inconvenience.

Appendix C:

Updated Probe Calibration Parameters

#039869

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
S Servizio svizzero di taratura
S Swiss Calibration Service

Accredited by the Swiss Federal Office of Metrology and Accreditation
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 108

Client Kyocera USA

Certificate No: ET3-1713_May05

CALIBRATION CERTIFICATE

Object: ET3DV6 - SN:1713

Calibration procedure(s): QA CAL-01.v5
Calibration procedure for dosimetric E-field probes

Calibration date: May 19, 2005

Condition of the calibrated item: In Tolerance

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	3-May-05 (METAS, No. 251-00466)	May-06
Power sensor E4412A	MY41495277	3-May-05 (METAS, No. 251-00466)	May-06
Power sensor E4412A	MY41498087	3-May-05 (METAS, No. 251-00466)	May-06
Reference 3 dB Attenuator	SN: S5054 (3c)	10-Aug-04 (METAS, No. 251-00403)	Aug-05
Reference 20 dB Attenuator	SN: S5086 (20b)	3-May-05 (METAS, No. 251-00467)	May-06
Reference 30 dB Attenuator	SN: S5129 (30b)	10-Aug-04 (METAS, No. 251-00404)	Aug-05
Reference Probe ES3DV2	SN: 3013	7-Jan-05 (SPEAG, No. ES3-3013_Jan05)	Jan-06
DAE4	SN: 617	19-Jan-05 (SPEAG, No. DAE4-617_Jan05)	Jan-06

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
RF generator HP 8648C	US3642U01700	4-Aug-99 (SPEAG, in house check Dec-03)	In house check: Dec-05
Network Analyzer HP 8753E	US37390585	18-Oct-01 (SPEAG, in house check Nov-04)	In house check: Nov 05

	Name	Function	Signature
Calibrated by:	Nico Vetterli	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: May 19, 2005

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
S Servizio svizzero di taratura
S Swiss Calibration Service

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Accreditation No.: SCS 108

Glossary:

TSL	tissue simulating liquid
NORMx,y,z	sensitivity in free space
ConF	sensitivity in TSL / NORMx,y,z
DCP	diode compression point
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis

Calibration is Performed According to the Following Standards:

a) IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
b) CENELEC EN 50361, "Basic standard for the measurement of Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz - 3 GHz), July 2001

Methods Applied and Interpretation of Parameters:

- *NORMx,y,z:* Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not effect the E^2-field uncertainty inside TSL (see below *ConvF*).
- *NORM(f)x,y,z = NORMx,y,z * frequency_response* (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of *ConvF*.
- *DCPx,y,z:* DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- *ConvF and Boundary Effect Parameters:* Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to *NORMx,y,z * ConvF* whereby the uncertainty corresponds to that given for *ConvF*. A frequency dependent *ConvF* is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- *Spherical isotropy (3D deviation from isotropy)*: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- *Sensor Offset*: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.

Probe ET3DV6

SN:1713

Manufactured:	August 7, 2002
Last calibrated:	July 16, 2004
Recalibrated:	May 19, 2005

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

DASY - Parameters of Probe: ET3DV6 SN:1713

Sensitivity in Free Space[A]

Diode Compression[B]

NormX	**1.59** ± 10.1%	$\mu V/(V/m)^2$	DCP X	**99** mV
NormY	**1.74** ± 10.1%	$\mu V/(V/m)^2$	DCP Y	**99** mV
NormZ	**1.66** ± 10.1%	$\mu V/(V/m)^2$	DCP Z	**99** mV

Sensitivity in Tissue Simulating Liquid (Conversion Factors)

Please see Page 8.

Boundary Effect

TSL **900 MHz** **Typical SAR gradient: 5 % per mm**

Sensor Center to Phantom Surface Distance		**3.7 mm**	**4.7 mm**
SAR_{be} [%]	Without Correction Algorithm	8.6	4.8
SAR_{be} [%]	With Correction Algorithm	0.7	0.1

TSL **1810 MHz** **Typical SAR gradient: 10 % per mm**

Sensor Center to Phantom Surface Distance		**3.7 mm**	**4.7 mm**
SAR_{be} [%]	Without Correction Algorithm	13.0	8.9
SAR_{be} [%]	With Correction Algorithm	0.7	0.1

Sensor Offset

Probe Tip to Sensor Center	**2.7** mm

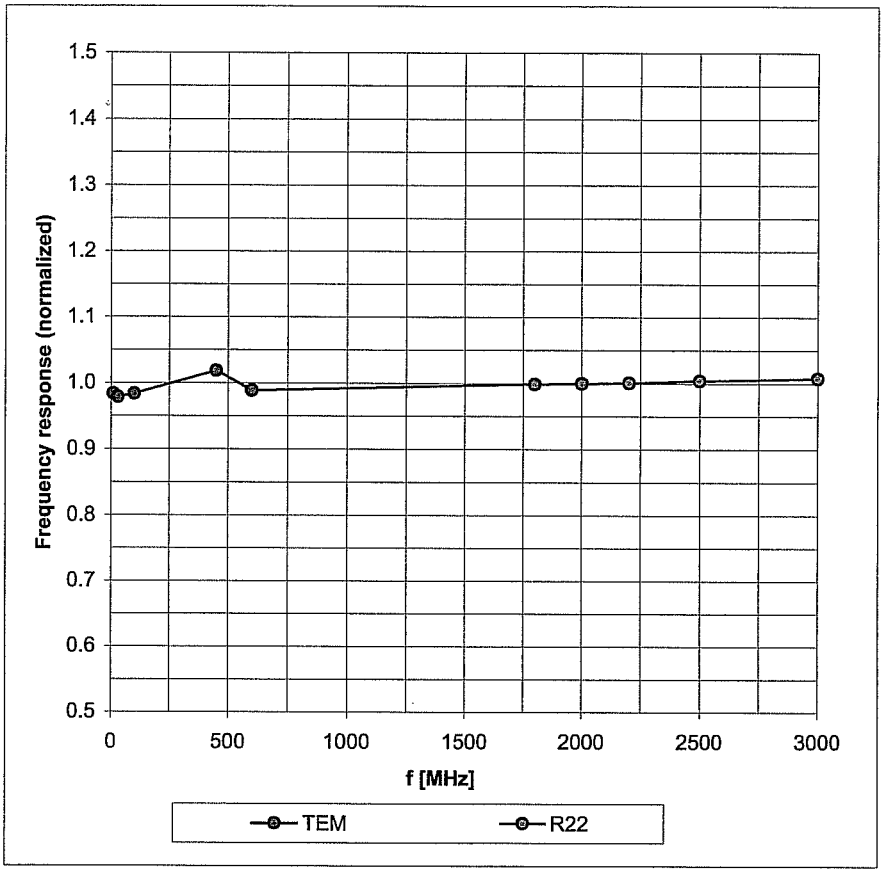
The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor k=2, which for a normal distribution corresponds to a coverage probability of approximately 95%.

[A] The uncertainties of NormX,Y,Z do not affect the E^2-field uncertainty inside TSL (see Page 8).

[B] Numerical linearization parameter: uncertainty not required.

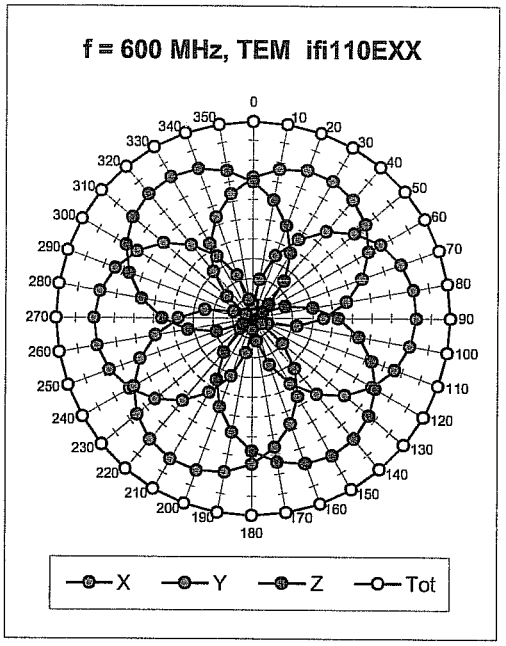
Frequency Response of E-Field

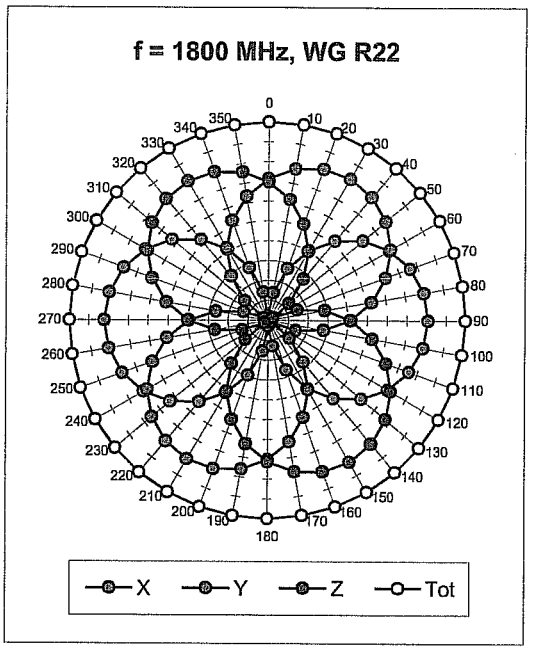
(TEM-Cell:ifi110 EXX, Waveguide: R22)

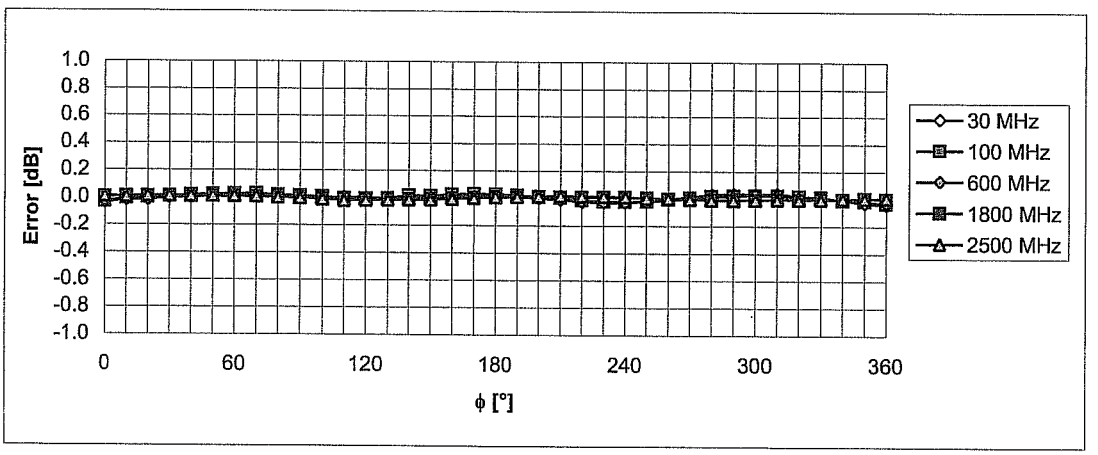


Uncertainty of Frequency Response of E-field: ± 6.3% (k=2)

Receiving Pattern (ϕ), ϑ = 0°



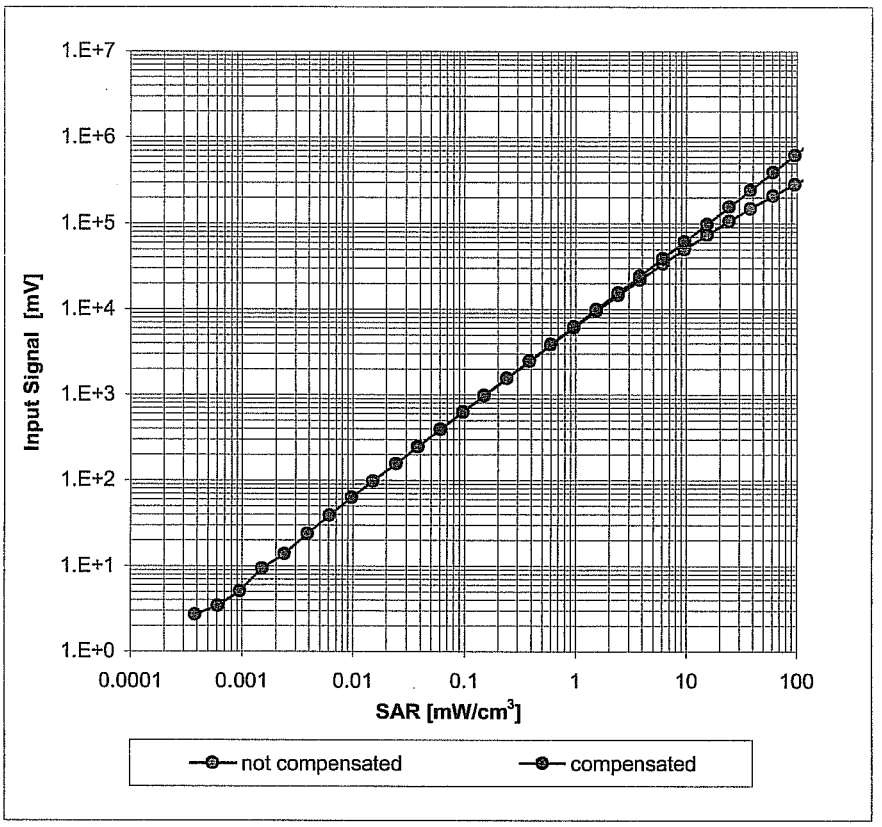


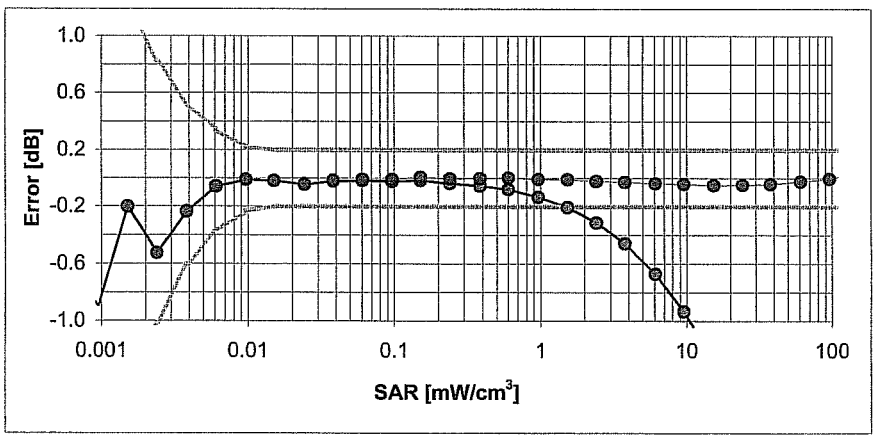


Uncertainty of Axial Isotropy Assessment: ± 0.5% (k=2)

Dynamic Range f(SAR_{head})

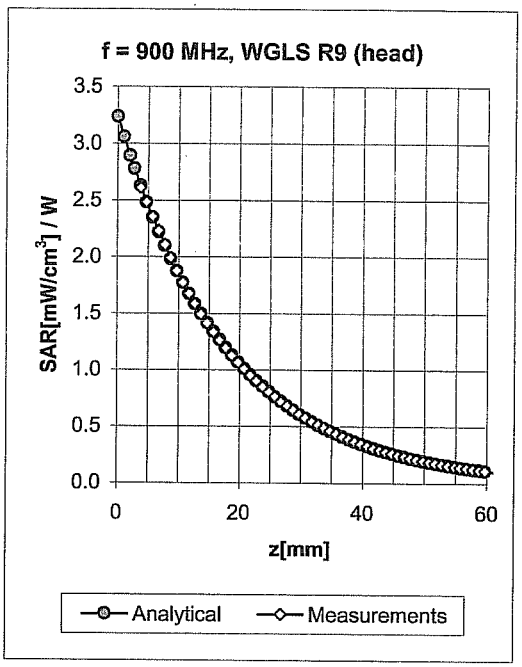
(Waveguide R22, f = 1800 MHz)

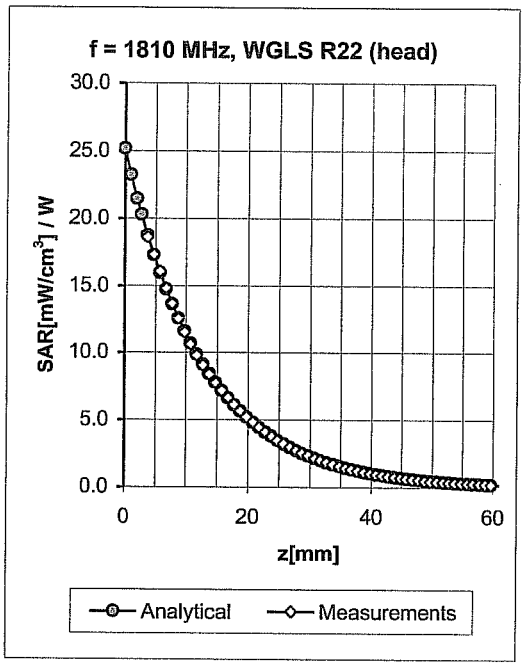




Uncertainty of Linearity Assessment: ± 0.6% (k=2)

Conversion Factor Assessment



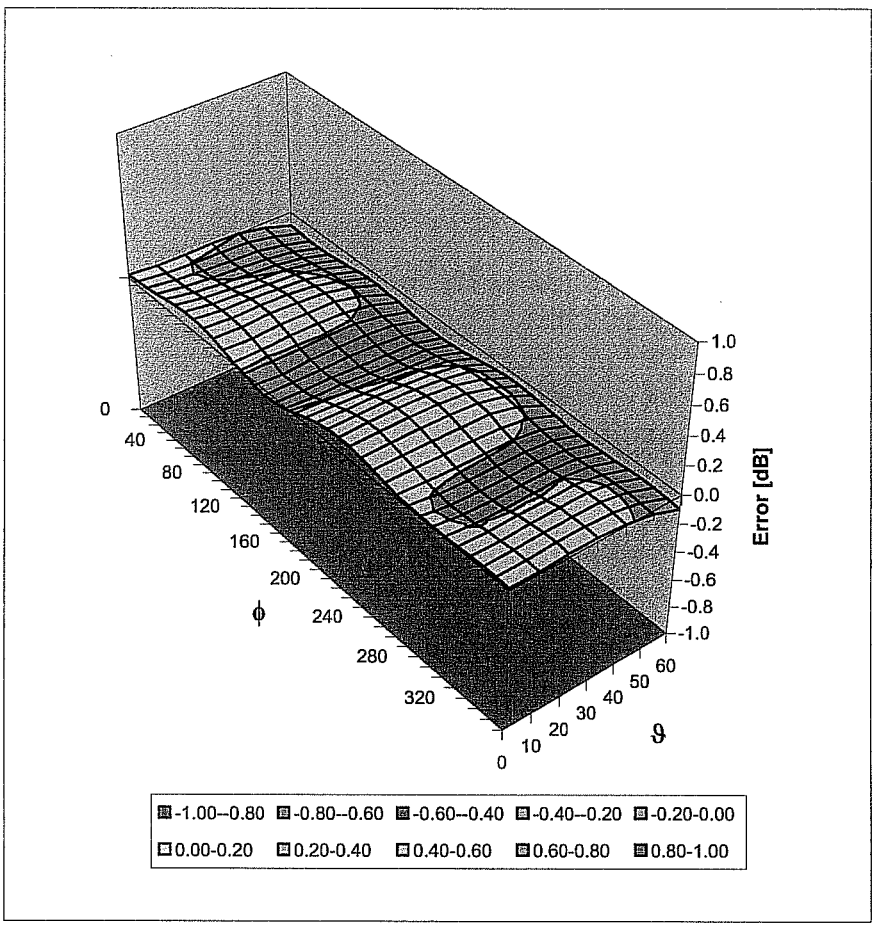


f [MHz]	Validity [MHz][C]	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
900	± 50 / ± 100	Head	41.5 ± 5%	0.97 ± 5%	0.90	1.57	6.29 ± 11.0% (k=2)
1810	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.52	2.52	5.18 ± 11.0% (k=2)
900	± 50 / ± 100	Body	55.0 ± 5%	1.05 ± 5%	0.92	1.62	5.98 ± 11.0% (k=2)
1810	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.51	2.90	4.62 ± 11.0% (k=2)

[C] The validity of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2). The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band.

Deviation from Isotropy in HSL

Error (ϕ, ϑ), f = 900 MHz



Uncertainty of Spherical Isotropy Assessment: ± 2.6% (k=2)