This document is generated in response to the queries asked in the e-mail from FCC Equipment Authorization Branch titled "FCC ID: OVFKWC-KX13" with Correspondence Reference # 21684, 731 Confirmation # TC734613. The queries asked in the e-mail received by C.K. Li on 15th of July 2005 are listed below followed by the responses for each of the questions.

----Original Message----

Date: Fri, 15 Jul 2005 16:53:49 -0400 (EDT)

From: Generic Office of Engineering Technology <oetech@fccsun27w.fcc.gov>

To: cli@kyocera-wireless.com

Subject: audit To: C. K. Li

From: Tim Harrington Tim.Harrington@fcc.gov

FCC Equipment Authorization Branch

Re: FCC ID: OVFKWC-KX13 Applicant: Kyocera Wireless Corp.

Correspondence Reference Number: 21684 731 Confirmation Number: TC734613 Date of Original Email: 07/15/2005

Subject: audit

TCB to address:

- fyi op desc, user manual, etc. indicate cdma2000 operation
- fyi filings should be clear about transmitter setup & operation capabilities to ensure devices are configured properly according to communication protocol and operating requirements to obtain valid SAR results
- fyi 5/12/05 TCB training notes state:

"New technologies

- TCBs should not process applications for new technologies unless test, review, and approval procedures are available and all TCBs are trained on any new or special requirements
- Example new technologies which may need specific procedures

CDMA-2000, Ev-Do, WCDMA, (Wi-Max & HSDPA or similar, etc.)

- Please consult with FCC Lab before starting application processing"

Supporting info should include but may not be limited to:

- a) CDMA MS Protocol Revision number.
- b) applicability of test codes to simulate the required test conditions, as defined in 3GPP2, TIA, and other standards.
- c) Base station simulator and test device configuration info and procedures used to establish maximum output in all applicable modes, including code domain channels, power & relative gain levels.
- d) Identify CDMA Radio Configurations, Service Options, multiplex options, voice/data, code channel combinations and options used for the SAR tests.
- e) Because of the different RC's, SO's, data rates, channel combinations and modulations, filing should include justifications on the selection of applicable configurations to establish and maintain maximum output to demonstrate SAR compliance for other configurations that are not tested.

Please submit appropriate info, or give pointers to within filing if info is already there.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c).

DO NOT Reply to this email 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, E-Filing, OET TCB Electronic Filing, TCB Login. If the response is submitted through Add Attachments, 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.

Question: a) CDMA MS Protocol Revision number.

KX13 is supporting CDMA MS Protocol revision 6.

Question: b) applicability of test codes to simulate the required test conditions, as defined in 3GPP2, TIA, and other standards.

The test code was used to generate IS-95 based CDMA waveform and bandwidth, transmitter power levels in all modes.

Question: c) Base station simulator and test device configuration info and procedures used to establish maximum output in all applicable modes, including code domain channels, power & relative gain levels.

The technical description of KX13 has been included in the Exhibit 1, which was submitted with the original application.

KX13 can operate in the CDMA mode specified in IS-2000.2 standard, release 0. It can only invoke a Spreading Rate 1 (SR1) operational mode. SR1 is defined as a 1.2288 Mcps chip rate-based system using a direct-spread single carrier, which limits the bandwidth to the same 1.25MHz bandwidth occupied by the legacy IS-95/8-A/B system. Thus, for SR1 in IS-2000, the frequency response is identical to the legacy IS-95 B system standard.

For Part 22 and 24, all of CDMA measurements were conducted with Agilent 8960 as a base station simulator. The base station simulator establishes a CDMA link with the test device. The CDMA link was configured via 8960 for all of measurements as follows.

Radio Configuration: RC1 Service Options: SO2

Code domain channels: R-FCH + R-PICH

Cell Power: -100 dBm/1.23MHz to -103 dBm/1.23MHz

Data Rate: full rate

Question: d) Identify CDMA Radio Configurations, Service Options, multiplex options, voice/data, code channel combinations and options used for the SAR tests.

To perform SAR tests, the phone was placed in test code mode to transmit maximum power at full rate for the specified channel. The CDMA signal tested was IS-95B based, i.e. RC1, SR1 and R-FCH only and full rate.

Question: e) Because of the different RC's, SO's, data rates, channel combinations and modulations, filing should include justifications on the selection of applicable configurations to establish and maintain maximum output to demonstrate SAR compliance for other configurations that are not tested.

SAR value depends on the transmitter power level and the duty cycle of the power being transmitted. The test device was placed in the test code mode in order to maintain the maximum outputs in all applicable modes during the entire SAR testing. Since the tests were conducted at all channels with phone transmitting maximum power and at full rate, these measurements would indicate the maximum possible SAR value for that particular channel irrespective of RC's, SO's and other data rates. As long as these measurements demonstrate SAR compliance, it should also demonstrate compliance for other configurations that were not tested.