

## Chris Harvey

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**From:** SunHee Kim (HCT) [alondra@hct.co.kr]  
**Sent:** Wednesday, November 19, 2008 2:43 AM  
**To:** charvey-tcb@ccsemc.com; Chris Harvey  
**Cc:** 'Nam-Wook Kang (HCT)'; chris.harvey@ccsemc.com; 'Mike Kuo'  
**Subject:** Re: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1a  
**Attachments:** N\_User's manual\_MV140N\_Rev.2.pdf

Hello Chris,

We revised the User Manual on page 57.  
Also, we confirm that the revised SAR report has been issued to remove test setup configurations that the applicant indicated were not valid operating configurations, therefore reporting only valid use configurations.

If you have further questions on this projects, please let me know.

Best Regards,  
SunHee Kim

----- Original Message -----

**From:** [Chris Harvey](#)  
**To:** '[SunHee Kim \(HCT\)](#)'; [charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)  
**Cc:** '[Sang-Jun Lee \(HCT\)](#)'; '[Mike Kuo](#)'; [chris.harvey@ccsemc.com](mailto:chris.harvey@ccsemc.com); '[Nam-Wook Kang \(HCT\)](#)'  
**Sent:** Wednesday, November 19, 2008 12:19 AM  
**Subject:** RE: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1a

Sun-Hee, Thank you for the fast response. I have reviewed the information provided and still have the following that needs to be addressed:

The manual still has the following statements:

“The highest SAR value for this model phone when tested for use at the when worn on the body, as described in this user guide, is 0.597 **W/Kg** . (Body-worn measurements differ among phone models, depending upon available accessories and FCC requirements).”

The actual testing was performed for near-body operation, not worn on the body. The following statement would better describe how the device was tested:

“The highest SAR value for this model modem when tested for use near the body, as described in this user guide, is 0.597 **W/kg**.”

Please also confirm that the revised SAR report has been issued to remove test setup configurations that the applicant indicated were not valid operating configurations, therefore reporting only valid use configurations.

Best regards,

Chris Harvey  
[charvey@ieee.org](mailto:charvey@ieee.org)  
410-750-0860

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**From:** SunHee Kim (HCT) [mailto:alondra@hct.co.kr]  
**Sent:** Tuesday, November 18, 2008 6:46 AM  
**To:** Chris Harvey; charvey-tcb@ccsemc.com

**Cc:** 'Sang-Jun Lee (HCT)'; 'Mike Kuo'; chris.harvey@ccsemc.com; 'Nam-Wook Kang (HCT)'  
**Subject:** Re: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1a

Hello Chris,

Thank you for your cooperation.

We attached the revised SAR report and Test Setup Photos.  
As you can find, the max SAR value has been change.

As for User Manual, please find the revised file on page 57 and 58.

If you have more comments, please feel free to contact me.

Best Regards,  
SunHee Kim

----- Original Message -----

**From:** [Chris Harvey](#)

**To:** '[SunHee Kim \(HCT\)](#)'; [charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)

**Cc:** '[Sang-Jun Lee \(HCT\)](#)'; '[Mike Kuo](#)'; [chris.harvey@ccsemc.com](mailto:chris.harvey@ccsemc.com); '[Nam-Wook Kang \(HCT\)](#)'

**Sent:** Tuesday, November 18, 2008 8:02 AM

**Subject:** RE: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1a

Dear Sun Hee,

Thank you for the response. I will make the changes to the online form as you indicated. I will include a note on the Grant that the Ferrite loaded cable must be provided with this device.

There is one additional issue that needs to be addressed. The Users Manual states in several sections information about Body-Worn operation and accessories such as Belt-Clips and Holsters. This device is a non-body-worn, but may have operation near the body (with a minimum of 2.5 cm separation). Please change the wording on pages 57 & 58 of the manual to remove the statements of body-worn operation and belt-clips and holsters and replace it with statements about near-body operations.

Best regards,

Chris Harvey  
[charvey@ieee.org](mailto:charvey@ieee.org)  
410-750-0860

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**From:** SunHee Kim (HCT) [<mailto:alondra@hct.co.kr>]

**Sent:** Monday, November 17, 2008 5:29 AM

**To:** [charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)

**Cc:** Sang-Jun Lee (HCT); Mike Kuo; chris.harvey@ccsemc.com; Nam-Wook Kang (HCT)

**Subject:** Re: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1

Dear Chris,

Thank you for your comments.

As for your questions, I'd like to clarify more for the below issues.

1. As for Radiated Emission testing, we confirm that the ferrite core possible USB cable was used during the test. Do you mean we have to indicate the statement into Test Report? If not, could you let me know more in specific? And we revised the FCC Equipment Class to PCB. Please find the attachment RF Test Report.

2. As for SAR, we performed both "USB cable connecting with PC" and "without USB cable connecting" configurations. But manufacturer confirm that the device can not operate without USB cable.  
Therefore, this is a USB modem with permanently attached cable.

According to your advice, the separation distance can be determined based upon user manual's RF exposure statement.

So we performed the SAR testing with 2.5 cm separation distance specified in the user manual. We'll remove the SAR values without USB cable connecting configuration from the Report. Then, we'll submit the revised Report tomorrow.

3. Please find the revised ID Label.

I hope above responses are sufficient to your comment. If you need more coordination, please feel free to contact me.

Best Regards,  
SunHee Kim

----- Original Message -----

From: <[charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)>

To: <[alondra@hct.co.kr](mailto:alondra@hct.co.kr)>

Cc: <[chris.harvey@ccsemc.com](mailto:chris.harvey@ccsemc.com)>

Sent: Sunday, November 16, 2008 7:08 AM

Subject: AXESSTEL INC., FCC ID: PH7MV140N, Assessment NO.: AN08T8594, Notice#1

> Dear Sun Hee Kim,

>

> You are listed as the Technical Contact for the above referenced TCB application. The following item(s) need(s) to be resolved before the review can be continued:

>

> The FCC ID Label is required to contain the characters "FCC ID:" immediately preceding the FCC ID. The ID label submitted contains the FCC logo for DoC but does not contain the characters "FCC ID:". Please revise the FCC ID Label to include the string "FCC ID:" in the correct position.

>

> The USB Cable connected to this device during the Radiated Emissions testing and Manual drawings appears to have something in line with the cable (possibly a ferrite cord). Please describe the USB Cable connection of this device during the test.

>

> It appears that this device is a modem box connected to a host through a removable USB cable. According to FCC KDB #447498, section 2(b), this USB Cabled device must be tested with 0cm spacing against the flat phantom. According to the SAR test setup photos the testing was performed with a 2.5cm spacing, which is not appropriate. According to the SAR test report (page 15 of 79) the device was tested with a 0.5 cm (5mm) separation which is also not appropriate.

>

> The SAR report describes 6 test configurations on page 15 of 79, but then describes on pages 21 and 22 configurations described as Front with PC, Front with Charger and Front with PC with Charger. Please explain more details of these configurations. Also please explain why for 836.52 MHz EvDO mid-channel the SAR measurements at Front is 1.07 W/kg, but the Front with PC is 0.574 W/kg, Front with PC with Charger is 0.507 W/kg, and Front with Charger is 1.00 W/kg. Please note that the PCS mid channel in the multiple modes seems to have less variable SAR values between modes.

>

> The RF Test report and online application form indicate that this is being filed as a PCE Class which includes operation at the ear. It appears that Equipment Class PCB as a General PCS/Cell transmitter is more appropriate for this device that does not have operation near the ear.

>

> 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 and forfeiture of the filing fee. 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.

>  
> Best regards,  
>  
> Chris Harvey  
> [Charvey-tcb@ccsemc.com](mailto:Charvey-tcb@ccsemc.com)  
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