



April 24, 2009

Federal Communications Commission
Authorization & Evaluation Division
7345 Oakland Mills Road
Columbia, Maryland
21046

Re: CR37352

As per the request referenced above, Novatel Wireless has submitted an updated MPE calculation. Also please note the following responses.

a) Original grant under this FCC ID had max. line-entry powers of 1.291 W ERP for GSM 800 and 0.971 W EIRP for GSM 1900, whereas MPE estimate appears to have treated this as conducted powers

- New MPE report addresses this issue

b) MPE estimate must be in terms of reported maximum source-based time-averaged conducted power

- New MPE report addresses this issue

c) Per 2.1043, radiated power for optional accessory antenna(s) must not exceed ERP & EIRP shown on grant

- We do not agree the Mobile configuration is bound by ERP/EIRP levels reported in the portable configuration. Novatel expects the Mobile grant conditions to limit the mobile antenna gain not to exceed levels identified by the relevant rule parts and MPE limits.

d) Per 2.1091(c), optional accessory antenna configuration(s) with output above categ. excl. levels are subject to RF exposure routine evaluation (not MPE estimate) 2.1091(c) ERP, W EIRP, W f = / < 1.5 GHz 1.5 2.46 f > 1.5 GHz 3 4.92

- The MPE report shows that the device does not exceed any levels identified in the relevant rule part.

e) following shows original grant listings - please provide same type of summary table except listing as-reported maximum source-based time-averaged conducted powers

- All conducted powers are listed and were retrieved from test report No. 0808191138-R1.PKR

22H 824.2 848.8 1.291 243KGXW - Conducted Power = 32.20 dBm

22H 824.2 848.8 0.731 245KG7W - Conducted Power = 27.93 dBm

22H 824.7 848.31 0.313 1M27F9W - Conducted Power = 24.43 dBm

22H 826.4 846.6 0.314 4M16F9W - Conducted Power = 24.60 dBm

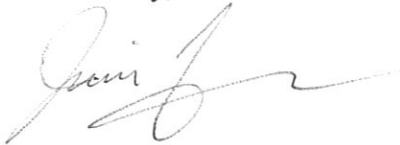
24E 1850.2 1909.8 0.971 242KGXW - Conducted Power = 29.10 dBm

24E 1850.2 1909.8 0.407 242KG7W - Conducted Power = 26.91 dBm

24E 1851.25 1908.75 0.279 1M27F9W - Conducted Power = 23.92 dBm

24E 1852.4 1907.6 0.263 4M17F9W - Conducted Power = 24.38 dBm

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Turner", with a stylized flourish extending to the right.

Jim Turner

Regulatory Technical Specialist
Novatel Wireless