

Office of Engineering and Technology

To: John Spall, Novatel Wireless Inc
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From: Tim Harrington
Tim.Harrington@fcc.gov

Re: FCC ID: PKRNVWMC760

Applicant: Novatel Wireless Inc
Correspondence Reference Number: 36211
Form 731 Confirmation Number: EA339510
Date of Original E-mail: 09/09/2008

TO: Applicant & Tech Contact (please coordinate reply where appropriate)

1) Short-term confidentiality is requested for internal and external photos - however confidentiality cannot be done for entire test reports. SAR report in this filing has device photos - this entire report can be set to short-term confidential if you submit a report version that is a copy except with blank-spaces at device photos.

NOVATEL RESPONSE: A New SAR Report with blank pictures has been submitted for upload.

An exhibit with only the pictures for short term confidentiality has also been submitted.

An updated Short Term confidentiality Letter has also been uploaded.

File: "MC760 Rev C No Photos_s.pdf"

File: "MC760 Rev C App C - Photos.pdf"

File: "Novatel MC760 -FCC Short Term Confidentiality Letter_final.pdf"

2) Parts List/Tune-up Info exhibit contains setup info apparently mainly for some Bluetooth device - please explain and/or revise

NOVATEL RESPONSE: A New BOM has been submitted for upload.

File: "MC760_BOM_Rev1.pdf"

3) Confidential request letter mentions "MC760 Frequency Stability" - however we do not see such exhibit; please explain and/or revise filing to submit and/or revise letter to de-list if not applicable

NOVATEL RESPONSE: A New Confidentiality Letter has been submitted for upload.

File: "Novatel MC760 -FCC Long Term Confidentiality Letter_2.pdf"

4) FYI as notified previously, at Table 10.2: The measured and target SAR values or the corresponding frequencies are incorrect, i.e. numbers do not match Appendix E in this report - please coordinate with SAR lab to ensure any future filings are correct

NOVATEL RESPONSE: A New SAR report with fixed values has been submitted for upload.

File: "MC760 Rev C No Photos_s.pdf"

5) As mentioned previously, the DUT was substantially embedded in (covered by) the device holder clamp for the Vertical with USB cable orientation. This setup is inconsistent with typical SAR measurement recommendations according to existing standards (1528 / 62209-1 etc.) It does not appear the DUT holder uncertainty was evaluated according to device-specific procedures (i.e. IEEE Std 1528-2003 E.4.1.1). The measured SAR can be affected and it is unclear if the device holder is perturbing or interfering with the DUT. The recommended test setup is to secure the DUT on a piece of foam and secure the foam in the device holder to provide several cm between the device and the holder. When the DUT is small, such as the USB dongle, holder perturbation can be of concern. Using measurements and/or analysis please provide info to support validity of DUT vertical-right position SAR results.

NOVATEL RESPONSE: A New SAR report with proper testing procedures at the Worst Case Values has been submitted for upload.

File: "MC760 Rev C No Photos_s.pdf"

6) Please provide SAR setup photos including scale/ruler to confirm device-phantom spacing.

NOVATEL RESPONSE: A New exhibit with updated pictures has been submitted for upload.

File: "MC760 Rev C App C - Photos.pdf"

7) Internal photo appears to show antenna structure embedded in housing, but does not appear to be described elsewhere in filing - please explain and/or revise

NOVATEL RESPONSE: A Cover Letter describing the Diversity Antenna in the Top Housing has been submitted for upload.

File: "Novatel MC760 Diversity Antenna Cover Letter.pdf"

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee pursuant to Section 1.1108

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Any questions about the content of this correspondence should be directed to the email address listed below the name of the sender.