

Novatel PKRNVWMC760

Note: Other exhibits (EMC output power, manuals, internal photos, other technical data etc) submitted for this filing, which are current unavailable until a certification is filed, will need to be considered in conjunction with the preliminary comments for this SAR report.

- 1) Page 7: (FYI) may consider revising paragraph 2 and 3 to provide clearer descriptions of the probe offset and measurement configurations.

I am not sure what changes are being asked of here. I have re-read the paragraph describing the probe offset and measurement configurations and do not see any need for clarification. Please give more detail of what you see is un clear.

- 2) Section 5: (FYI) SAM Phantom - There is no description for the third phantom.

I have added the Uni-phantom to the description.

- 3) Section 5: (FYI) Mixture – Glycol and saline is not the only mixture. Paragraph needs clarification.

I have fixed the paragraph to be generic pointing to the table for the ingredients.

- 4) Table 5.1: These tissue recipes are unable to achieve the specified target dielectric parameters. The ingredients are in error and inappropriate.

The values were in the incorrect position. It was a typographical error. I have fixed the values to list them in the correct proportions.

- 5) Section 9: Device Holder uncertainty – the DUT was substantially embedded in (covered by) the device holder clamp for the Vertical with USB cable orientation (See page 206, upper right photo). This setup is not appropriate and inconsistent with the typical SAR measurement recommendations according to existing standards (1528/62209-1 etc.) It does not appear the DUT holder uncertainty has been evaluated according to required procedures. 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. Note: need internal photo to identify antenna locations etc. which could help evaluate or estimate extend of holder perturbation and impact on SAR.

The DUT uncertainty is listed in the table of uncertainties on page 15. A photo of the antenna locations was included in Appendix C.

- 6) Table 10.2: The measured and target SAR values or the corresponding frequencies are incorrect.

Per an FCC determination at the TCB meetings, the target value for the table was to be the value of the dipole calibration. The values listed in the table 10.2 are the values of the dipole calibration target with the measured within 10% of that value as long as it stays within the $\pm 10\%$ of the original target value from OET Bulletin 65 Supp. C.

- 7) Section 11: (FYI) “Device Test Condition” – DUT is not battery operated. Please identify the RF absorber, as explained in earlier communications and its location on an internal photo.

I have removed all indications of a battery from Section 11. An internal photo of the location of the RF absorber has been included in the Appendix C.

- 8) Section 12.1: (FYI) device is not battery operated and cannot be charged.

The note about the battery has been removed.

- 9) Section 12.2.3: Please identify all Radio Configurations (RC) the device is capable of transmitting. Is SCH active for the results in the TDSO SO32 RC3 column and identify if power set back procedures were applied?

The tables for conducted power have been revised to include all the power measurements and the configurations for each measurement.

10) Pages 21-26: SAR data summary pages – need to identify the RC and SO, FTAP/RTAP, FETAP/RETAP configurations for the SAR tests and the conditions that do not require some of the other tests. Battery column - device has no battery. Provide descriptions for the test positions Top, Bottom, Right & Left; especially the dominant (normal) horizontal orientations available in most laptop computers.

The Data Summary sheets have all been updated to show the configuration used for each test. The description of each of the test positions and configurations are on page 17 of the report.

11) Please identify the connector and tail ends of the device on selected SAR plots to associate SAR distributions with device orientation and antenna locations etc.

The plots have all been revise to indicate the connector and tail end of the device.

12) For each SAR data set, Touch Orientation and DUT position do not apply. Please identify accordingly – horizontal, vertical, up, down, cabled etc. and identify such configurations in the test setup photos. The CDMA mode (1xRTT, EVDO Rev0 or Rev A should also be indicated in the SAR data sheets. The final SAR report submitted to the EAS for certification should have the relevant information.

All the noted information has been added to the data sheets.

13) Will need to review instructions in the user manual.

14) Will need to review output power data in EMC report.