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March 28, 2007

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Diane Poole

**SUBJECT: Novatel Wireless Inc.
FCC ID: PKRNVVWX620
731 Confirmation No.: EA151955
Correspondence Reference No.: 32567
Request for Tech. Info.: February 16, 2007**

Dear Diane:

Transmitted herewith, on behalf of **Novatel Wireless Inc.** is an amendment provided in response to the request for technical information dated February 16, 2007.

- A. The Short-Term Confidentiality Request has been revised and uploaded.
- B. The Short-Term Confidentiality Request has been revised to include SAR Test Setup Photos and uploaded.
- C. Since there is no formal test procedure for USB-dongle transmitters, PCTEST (AI Cirwithian) contacted Tim Harrington to inquire about the test procedure that should be used for SAR testing of this application. PCTEST inquired about using the same procedure that was used in a previous application granted by the FCC (FCC ID: PKRNVWMCD3000/ EA420698), and the FCC agreed. In that test procedure, the spacing from the phantom was based on the spacing provided by a notebook PC with the transmitter plugged directly into the USB port (without the cable). This spacing is stated in the User's Manual. Thus, absent a formal test procedure for USB-dongle transmitters, PCTEST followed the commission's guidance and used a test procedure that had been previously approved by the FCC. We understand that the USB-dongle configuration is difficult to standardize and interpretations may evolve. We respectfully request the same consideration granted for the previous submission to be applied for this submission. We understand the need to continually seek the commission's advice on future applications of this nature.

We trust this information is sufficient to resolve FCC questions in this application. If you have any further questions, please do not hesitate to contact us.



Randy Ortanez
President

cc: Novatel Wireless Inc.