

Please provide item-by-item response for how the following from previous QISE870 are adjusted in new exhibits:

Filing has SAR evaluation for ExpressCard module-like device in a stand-alone (extender card) configuration - per KDB pub 447498 item 4) c), uniform procedures have not been established for such configurations, therefore filing is not consistent with 2.962(c)(4), 2.962(f)(1), 2.962(f)(5)(i).

Answer:

The revised SAR report has been uploaded, which was tested according to KDB pub 941225 - 2006 SAR procedures

2) SAR evaluation does not appear to be consistent with at least following portion of KDB pub 941225 - 2006 FCC HSDPA SAR procedures

a) Results for all applicable physical channel configurations (DPCCH, DPDCHn and spreading codes, HS-DPCCH) should be tabulated in the [SAR] test report. All configurations that are not supported by the DUT or cannot be measured due to technical or equipment limitations should be clearly identified.

b) The device operating parameters described in the test procedures should be closely followed and fully documented in the test report to enable the tests to be repeated easily and with sufficient accuracy.

Answer for a) & b):

We have done additional required SAR test for WCDMA and HSDPA according to KDB pub of KDB pub 941225 - 2006 SAR procedures. And results for all applicable physical channel configurations (DPCCH, DPDCH1 and spreading codes, HS-DPCCH) are already been tabulated in the SAR test report. Now the tests are able to be repeated with sufficient accuracy. Please refer to the revised SAR test report.

3) Filing appears to indicate device capable and/or marketed as HSPA, indicating device is capable of 3GPP Rel 6 operations

a) EMC reports throughout describe device as HSUPA

b) cover letter exhibit attestation says device is HSDPA "TS 25.101 V5.h.0" - assuming this refers TS 25.101 V5.17.0

(http://www.3gpp.org/ftp/Specs/archive/25_series/25.101/25101-5h0.zip), that version does not apply for HSPA - therefore filing is inconsistent and incorrect

c) user manual describes device as HSPA

Answer for a), b) & c):

The function of HSUPA has been disabled. Now this device is no longer capable marketed as HSPA and no longer capable of 3GPP Rel 6 operations.

An attestation letter is included to state the HSUPA function has been disabled and user

manual do not support the HSUPA on band 2 and band 5 now.

4) if not in filing already, please ensure all tests in EMC report contain all device and instrument setup parameters for all WCDMA and HSDPA (HSPA where applicable) modes

Answer:

All tests in EMC report have contained all device and instrument setup parameters for all WCDMA and HSDPA modes under KDB 941225 with power measurement configurations as follows:

-12.2kbps RMC and 64, 144, 384, 768 kbps RMC were measured, where DPDCH 2,...,6 are not applicable since they are not supported by this device.

Please refer to the revised Part 22H and 22E EMC test report.

5) Uniform procedures have not been defined for SAR evaluation using ExpressCard-to-Cardbus adapter card - therefore TCB processing is inconsistent with 2.962(c)(4), 2.962(f)(1), 2.962(f)(5)(i).

Answer:

The revised SAR report has been uploaded, which was tested according to KDB pub 941225 - 2006 SAR procedures

6) EMC report exhibits appear to indicate radiated power testing not in accordance with KDB pub 497522 integral-antenna user-installed card multiple-host procedure

Answer:

The revised EMC report has been uploaded.