## **Justification Letter**

Date (March 9, 2018)

BABT TCB
Balfour House,
Churchfield Road,
Walton-on-Thames,
Surrey,
KT12 2TD

Dear Sir or Madam,

We,

Huawei Technologies Co., Ltd. Bantian, Longgang District, Shenzhen, 518129, China

hereby to do the original application justification on FCC application: Smart Phone, EML-L09, FCC ID: QISEML-L09 as following:

EML-L09 is subscriber equipment in the LTE/ WCDMA/GSM system. The LTE frequency band is Band 1,Band 2,Band 3,Band 4,Band 5, Band 6, Band 7,Band 8, Band 9,Band 12,Band17, Band 18,Band 19, Band 20, Band 26, Band 28,

Band 32, Band 34,Band 38,Band39, Band 40 and Band 41.The HSUPA/HSDPA/UMTS frequency band is Band I, Band IV, Band V, Band VI, Band VIII and Band XIX.The GSM/GPRS/EDGE frequency band includes GSM850 and

GSM900 and DCS1800 and PCS1900. The Mobile Phone implements such functions as RF signal receiving/transmitting, LTE/ WCDMA /GSM protocol processing, voice, video, MMS service, GPS, NFC and WIFI etc.

Externally it provides earphone port (to provide voice service) and dual USIM card interfaces. It also provides Bluetooth module to synchronize data between a PC and the phone, or to use the built-in modem of the phone to access the

Internet with a PC, or to exchange data with other Bluetooth devices.

The mobile phone EML-L29 (FCC ID: QISEML-L29) is a Smart Phone. The differences between EML-L29 and EML-L09 are showed in the following table. The difference only lies in EML-L09 delete one SIM card by software. Other parts of the

mobile phone are the same, including the appearance, the antenna, Chipset, Bluetooth mode, Wifi mode, Adapter, Battery, and so on.

	EML-L29	EML-L09
GSM four	B2/B3/B5/B8	B2/B3/B5/B8
bands		
WCDMA	B1/2/4/5/6/8/19	B1/2/4/5/6/8/19
bands		
LTE bands	FDD LTE :	FDD LTE :
	B1/2/3/4/5/6/7/8/9/12/17/18/19/20/	B1/2/3/4/5/6/7/8/9/12/17/18/19/20/
	B26/28/32	B26/28/32
	TDD LTE :	TDD LTE: B34/B38/39/40/41(110M,2545-
	B34/B38/39/40/41(110M,2545-2655)	2655)
FCC bands	GSM850/1900	GSM850/1900
	WB2/B4/B5	WB2/B4/B5
	LTE B2/4/5/B7/B12/B17/B26/38/B41	LTE B2/4/5/B7/B12/B17/B26/38/B41

SIM card	Two	One
NFC	the same	the same
External camera	the same	the same
internal camera	the same	the same
FLASH	the same	the same
Mainboard	the same	the same
PCB layout	the same	the same
Appearanc e	the same	the same
Bluetooth mode	the same	the same
WLAN mode	the same	the same
BT/ WLAN antenna	the same	the same
GSM/ WCDMA /LTE antenna	the same	The same
Adapter	the same	the same
Battery	the same	the same
Chipset	the same	the same
Memory	the same	the same
RF	The same RF Parameter in the same	The same RF Parameter in the same band
Parameter	band	
Dimension	the same	the same
Main Frequency NV	The same NV in the same band	The same NV in the same band

So in this FCC application for Smart Phone, EML-L09, FCC ID: QISEML-L09

New Test report SYBH(Z-EMC)20180131016001-2 for FCC Part 15B have been submitted, and this report according to Part 15B is valid and applicable and they are representative of the compliance of EML-L09, FCC ID: QISEML-L09

Test data in report SYBH(Z-RF)20180131016001-2005 for Bluetooth (DSS part) refer to report "SYBH(Z-RF)20180131018001-2005" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09)

Test data in report SYBH(Z-RF)20180131016001-2004 for Bluetooth Low Energy(DTS part) refer to report "SYBH(Z-RF)20180131018001-2004" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09)

Test data in report SYBH(Z-RF)20180131016001-2002 for 2.4GHz WLAN(DTS part) refer to report "SYBH(Z-RF)20180131018001-2002" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SYBH(Z-RF)20180131016001-2003 for 5GHz WLAN refer to "SYBH(Z-RF)20180131018001-2003" in FCC application for EML-L29 ( FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SZEM180200138701 for DFS test of 5GHz WLAN refer to "SZEM171201293901" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SZEM180200138702 for spurious emission test of 5GHz WLAN refer to "SZEM171201293902" in FCC application for EML-L29 ( FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SYBH(Z-RF)20180131016001-2001 for GSM/UMTS/LTE(except LTE band 26) refer to report "SYBH(Z-RF)20180131018001-2001" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report ER/2018/20010 for LTE band 26(814-824MHz) refer to report "ER/2018/10040" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SZEM180200138703 for LTE band 26( 824-849MHz) refer to report "SZEM171201293903" in FCC application for EML-L29 ( FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report SYBH(Z-RF)20180131016001-2006 for NFC refer to report "SYBH(Z-RF)20180131018001-2006" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09).

Test data in report E5/2018/20024 for SAR refer to report "E5/2018/20009" in FCC application for EML-L29 (FCC ID: QISEML-L29), and this data remains valid and applicable and they are representative of the compliance of EML-L09 (FCC ID: QISEML-L09). But SAR test were repeated on worst case of each transmitter band.

Sincerely,

For and Behalf of: Huawei Technologies Co., Ltd.

Zhang Yong how

Zhangxinghai EMC Laboratory Manager