

## **Applicant Response to FCC response on 11/21/2013**

1) We note that at minimum the EMC/radio test setup photos in the original filing for QMNA show “smart cover”, which seems inconsistent with present situation of C2pc to amend the FCC ID with representations and test data for smart-cover accessory.

**Applicant: In the original filling, the smart cover was part of the Part 15b test setup where all ports are populated. The available docking connection in the tablet is compatible only with this cover.**

2) At minimum the PCB tc734650 contains a short-term confid. (STC) letter and the form-731 has Ostensibly this is unacceptable inconsistency across an application and unacceptable for TCB to submit a request for FCC PBA review.

**Applicant: We had the STC requested in both Form 731, the initial and C2PC application, done 2 ½ weeks ago. We released the STC this week.**

3) For this and all filings for all future devices TCB AND APPLICANT in all exhibits AND in grant remarks / comments / conditions please do not use descriptive “body worn” for tablet and similar devices that have SAR compliance information for body exposure conditions but are not “body worn” like historically and conventionally are mobile-phone handsets with belt-clip or holster body-worn accessories.

**Applicant: Test Reports updated: Replaced all “body worn” terms with “body”.**

**Documents: Exhibit11a\_FCC\_RX-114\_05+\_Appendixes\_A\_to\_E.pdf**

**Exhibit11b\_Appendix F\_to\_L\_for\_FCC\_RX-114\_05.pdf**

4) Page 3/8 of SAR setup photos shows tablet only without accessory cover attached, however this C2pc is for adding accessory cover therefore please AMEND exhibit to show front, back, top, bottom, side views of tablet in cover NOT adjacent to phantom and for all end-use operating configurations = cover folded over, prop to max angle, prop to any intermediate angles, etc whichever are applicable.

**Applicant: SAR test setup photos document updated: Added photos of tablet + cover in the intended and tested use positions, from all angles (front, back, top, bottom, and side views).**

**Document: Exhibit07a\_SAR\_Photo\_RX-114\_06\_rev.pdf**

5) In e-filings please submit install/operating instructions to be provided to users for tablet in cover.

**Applicant: Attached for the user instructions for the tablet cover.**

**Document: Exhibit08\_Nokia\_Power\_Keyboard\_SU-42\_UG.pdf**

6) Concerning for example page 170 of “SAR F to L”, if feasible for this filing too but at minimum for all future filings containing similar test results, please split the tables and figures across multiple conventional size pages rather than microscopic font sizes and details on single or a few oversized pages. This will better facilitate and assist the time taken for FCC review of PBAs and post-grant audits presumably also will aid the TCB required review of all info in filings.

For the example of page 170, if table overall “block” is moved to below instead of next to the figure “block”, then that “row” should fit nicely on one letter or A4 sized page. All rows of page 169 should be split similarly.

**Applicant:** Pages 169 – 175 of this document were re-edit to split the tables and figures, increasing the font sizes.

**Document: Exhibit11b\_Appendix F\_to\_L\_for\_FCC\_RX-114\_05.pdf**

7) Unless similar concept is visible elsewhere in exhibits, for page 1 of “Tx Power” please amend/replace “laptop position” to show rough or exact extents and locations of all antennas.

**Applicant:** Attached for the document with the antenna location and distances.

**Document: Exhibit07c\_RX-114\_Antenna\_Description.pdf**

8) Unless it is in SAR report already, please amend to describe what are “estimated SAR” results at all places, details how obtained for each results sets, etc.

**Applicant:** Description in the following pages of the SAR test report: Exhibit11a\_FCC\_RX-114\_05+\_Appendixes\_A\_to\_E.pdf

**Page 30 – Section 5.3 Scan Procedures**

9) PBA inquiry text indicates the PBA “trigger” conditions are “requirements laid out within KDB 447498, especially section 6.4 and 4.3”.

For reference those section headings are:

4.3. General SAR test reduction and exclusion guidance

6.4. After-market accessories

We note those sections in and of themselves ostensibly do not list PBA-required conditions.

**Applicant:** For section 4.3: We have followed the general SAR test reduction guidance. Initial understanding is that PBA was not applicable. Or if PBA is applicable please

consider it for PBA review.

**For section 6.4: We are 1) category i.e. accessory from original manufacturer that does not contain transmitter -> Class I or II permissive change needed. We indicated it to be PBA because of the completed inquiry. If PBA is not applicable, please exclude it from PBA review.**

KDB pub 388624 D01 generally requires TCBs to identify applicable condition(s) from KDB pub 388624 D02 PBA list.

For reference we note for example the following from 388624 D02 v14r01 which MIGHT or might not be applicable for this case.

B. 9. When simultaneous transmission SAR measurement is required (see enlarged zoom scan measurement and volume scan post-processing in KDB Publication 865664 D01).

B. 11. When non-standard phantom configurations or test procedures are used for SAR testing. ...

B. 13. When the published RF exposure KDB procedures do not readily support the form factor, design or implementation of a product or exposure condition.

In this case, in general the TCB is responsible to ensure all test conditions omitted are consistent with KDB 447498 provisions and also that the KDB 616217 laptop and tablet procedures are fully addressed as applicable, or TCB must coordinate with applicant to revise in case of any discrepancies.

**Applicant:**

**B.9. Enlarged zoom scans were required, so PBA is needed.**

**B.11. Test procedures were not non-standard in the sense that KDB test exclusion calculations were strictly followed in the end. However, KDB inquiry was made, so does this mean that also PBA is needed? If PBA is applicable please consider it for PBA review.**

**B.13. KDBs don't readily support tablet covers in specifics, so inquiry was made. If PBA is applicable please consider it for PBA review.**

10) Concerning 388624 D02 v14r01 item B. 9. (enlarged zoom scan measurements and volume scans post-processing for simultaneous transmitting) , we note SAR report mentions "expanded volume scan" and "expanded zoom scan" therefore ostensibly the PBA condition would apply, and TCB needs to identify that as such when submitting a PBA KDB.

**Applicant: Identified this item in the revised form 731**

At quick look starting from page 77/113 in this filing, it appears the results listed are identical to those shown starting on page 70/106 of SAR report in this original filing. In other words

apparently those are results with cover not installed therefore NOT applicable for this C2pc.

**Applicant:** We have included all original SAR results also to this filing due to our understanding that all FCC RF Exposure reports need to be “standalone reports”. Therefore also the maximum combined SAR cases and values are same as in original report, since all values measured with the cover are lower than in original filing (measured without the cover).”

Therefore at this stage we are suspending our PBA review, pending reply at minimum concerning which / where results are subject to PBA conditions, and/or SAR reports are revised accordingly in case all SAR results with cover would not be subject to PBA

**Applicant:** Updated form 731 including all the conditions subject to PBA

Please explain and/or revise this filing accordingly to clearly identify for all SAR results for supporting compliance with the cover installed, and omit results applicable only to the original-without-cover condition as appropriate.

**Applicant:** Please refer to addressed items above. Hope it will answer the open issues.