FCC ID: QVVRM-109_ATCB002477 June 14, 2005

RE: Reply to "6-8-05 QVVRM-109_ATCB Comments.pdf"
Attention: Dennis Ward

ATCB 1. Please note that the operational description states that this device is both GSM and WCDMA. It appears that only the 300KGXW and the 300KG7W are appropriate for the US. However, the 731 mentions 1930.2 to 1989.8MHz band. Is this in error? Please explain.
Answer: The frequency range 1930.2 to 1989.8MHz was added by mistake. The corrected form 731 was uploaded to the ATCB server, see "ATCB-Form731_QVVRM-109_REVISED.pdf"

ATCB 2. Please note that while the first plot on page 7 of the BT report matches the data in the table on page 6 of the report, the other plots on pages 7 and 8 do not. Please note that the headings on these other plots say the resolution bandwidth is 1MHz, however, the plots themselves show a resolution bandwidth of 10kHz. Are the other 2 data in the table on page 6 from plots that were not included? Please explain the discrepancy between the plots and table data.
Answer: The above mentioned conducted peak power plots in the BT reports were wrong. The numerical values are correct. The revised BT test report with the corresponding plots was uploaded to the ATCB server, see "E06_QVVRM-109_Part_15C_report_REVISED.pdf"

ATCB 3. FYI – no action needed. Please note that you have only reported the smallest dwell time. Please note that the highest dwell time for a BT device is typically around 250 to 300+ ms. Please report the highest dwell time in future reports.
Answer: Noted.

ATCB 4. FYI - Please note that the 20 dB bandwidth reported in the test report is not in accordance with the specified IC bandwidth measurement procedure. Please note that the IC procedure sets the reference level to that found in the peak power measurement procedure and then sets the resolution bandwidth to approximately 1% of the device bandwidth. The 20dB bandwidth is then taken from the reference level 20dB down. This then is the IC 20dB bandwidth. This required IC test method can be found at the following website - http://strategis.ic.gc.ca/epic/internet/incebbhst.nsf/vwapj/OCC_BW_E.pdf/$FILE/OCC_BW_E.pdf. In the future, please use this method for measuring IC 20dB or 99% bandwidth.
Answer: We will change the VBW to 3 times the RBW for future measurements. About the reference level: The measurement result is not affected if the peak emission is lower than the reference level of the spectrum analyzer. The measurement method IC presents was made in an era when spectrum analyzers did not have inbuilt functions for measuring OBW. We use the inbuilt OBW option for measuring this. The result is relative and is not effected by the reference level selection

ATCB 5. FYI – no action needed. Please note that while reference to the substitution method is good, the report should have the actual description of how the substitution method was performed.
Answer: Noted.

ATCB 6. Please provide the calibration data for the probe and validation dipole used in the SAR test.
Answer: Calibration data were uploaded to ATCB servers, see files " Dipole 1900_2004 07 13.pdf" and " Probe 1396_2005 01 20.pdf"

ATCB 7. Please provide the English version of the manual.
Answer: QVVRM-109 is not intended to be sold in USA/Canada. It is for sales in Japan only, therefore no English users manual exists. Regarding English safety and RF exposure information, please refer to the safety booklet "E08_QVVRM-109_safety_and_SAR_booklet.pdf" (page 11 onwards) which was already submitted.

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