

Chris Harvey

From: Harvey Sung [harveysung@digitalemc.com]
Sent: Monday, April 13, 2009 8:35 AM
To: 'Chris Harvey'; charvey-tcb@ccsemc.com
Cc: chris.harvey@ccsemc.com; mike.kuo@ccsemc.com; 'Harvey Sung'
Subject: RE: Epivalley CO.,LTD., FCC ID: R2NSUC-2000, Assessment NO.: AN09T8952, Notice#1
Attachments: R2NSUC-2000_r1.zip

Dear Chris,

Thanks a lot for your good cooperation.
Please refer to below my responses and attached files.
The user's manual is also revised due to correcting max SAR value.

Best regards,
Harvey Sung

-----Original Message-----

From: charvey-tcb@ccsemc.com [mailto:charvey-tcb@ccsemc.com]
Sent: Thursday, March 19, 2009 10:44 PM
To: harveysung@digitalemc.com
Cc: chris.harvey@ccsemc.com; mike.kuo@ccsemc.com
Subject: Epivalley CO.,LTD., FCC ID: R2NSUC-2000, Assessment NO.: AN09T8952, Notice#1

Dear Harvey Sung,

You are listed as the Technical Contact for the above referenced TCB application. The following item(s) need(s) to be resolved before the review can be continued:

1. This device utilized 3GPP release 6 HSUPA operation, which requires an FCC Permit But Ask request. This PBA will be filed soon, but there is additional information required for this request for the MPR in the 5 subsets. The power reduction does not seem to match the expected 0,2,1,2,0 dB reductions in the 5 subsets, although the measurements have been performed.

According to KDB #941225

<https://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=26930&switch=P>

When Release 6 HSPA equipment certifications are received by a TCB, a Permit-But-Ask (PBA) must be requested by the TCB through the FCC KDB to enable a TCB to accept and review such filings. The TCB should request the following information from the grantee/manufacturer or its test laboratory and verify the information before submitting a PBA request:

a) Output power measurement results according to the FCC 3G SAR measurement procedures (KDB 941225)

b) Verify the power measurement results against device specifications and 3GPP requirements, including but not limited to the sub-test configurations and Maximum Power Reduction (MPR) requirements, to determine if HSPA SAR evaluation is necessary.

The TCB is responsible for resolving any power measurement issues prior to submitting the PBA; otherwise, the PBA cannot be justified.

The TCB must verify the power measurement results according to 3GPP MPR requirements and how it is implemented in the device being tested; for example, a power reduction on the order of 0, 2, 1, 2, 0 dB are expected for the HSPA sub-test configurations 1 □ 5, respectively, when implemented according to 3GPP recommendations.

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Otherwise, detailed explanations must be included in the PBA as well as the final SAR report to substantiate the test results.

When no additional SAR measurement is necessary for HSPA, based on the power measured for the MPR implementations, a PBA is justified.

The TCB should confirm that operating parameters such as the different f and P values are configured properly and the power measurement procedures used have included the power setback considerations specified in 3GPP TS 34.121. It must be ensured that the HSPA channels have remained active with the required E-TFCI and AG index values maintained during the durations of the measurements.

c) If the power measurements indicate that SAR measurements are necessary for HSPA, the detailed procedures, with respect to 3GPP TS 34.121 for HSPA, must be reviewed by the TCB to determine that the required HSPA test parameters, including stable TFCI and output power conditions, have been used for the HSPA SAR measurements; other related HSPA issues identified in the corresponding KDB must also be addressed before the PBA can be authorized. "

Please provide all of this additional information required by the FCC.

=> The power is re-tested and the test report is revised please refer to revised test report.

2. The Frequency Stability data/plots on page 24 of the RF report are blank. Please correct the PDF document to show the plots.

=> This error was corrected. Please refer to revised RF test report.

3. According to FCC KDB # 450824

<https://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=29244&switch=P> when the SAR probe calibration frequency is >50MHz from the measurement frequencies, then additional measures should be taken.

"(2) When nominal tissue dielectric parameters are specified in the probe calibration data, the tissue dielectric parameters measured for routine measurements should be less than the target f and higher than the target f values to minimize SAR underestimations. Otherwise, a thorough analysis of the effective frequency interval supported by the probe calibration and dielectric medium should be included in the SAR report to substantiate the test results. Alternatively, the measured I-g SAR may be compensated with respect to +5% tolerances in f and -5% tolerances in f computed according to valid SAR sensitivity data, to reduce SAR underestimation and maintain conservativeness."

Please provide this additional information required by the FCC.

=> Please refer to attachment for additional steps. And test was re-tested for this requirement. Please refer to attached revised SAR test report too.

4. Please confirm that the photo of the Horizontal-Up position for SAR has the USB Dongle directly connected to the notebook computer and not connected using the short USB cable used in the other positions.

=> Only the horizontal-up position tested with the laptop computer.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

Best regards,

4/14/2009

Chris Harvey
Charvey-tcb@ccsemc.com