

## Chris Harvey

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**From:** SunHee Kim (HCT) [alondra@hct.co.kr]  
**Sent:** Friday, November 28, 2008 2:43 AM  
**To:** charvey-tcb@ccsemc.com; Chris Harvey  
**Cc:** mike.kuo@ccsemc.com; chris.harvey@ccsemc.com  
**Subject:** Re: Cal-Comp Electronics & Communications Company Limited, FCC ID: US7-A600, Assessment NO.: AN08T8595, Notice#2  
**Attachments:** USB Dongle Guidance from FCC.pdf

Chris,

We've got an below reply and attachment file from FCC.  
But this is same as TCBC conference call document.  
I attach for your reference.

BR,  
SunHee Kim

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

**From:** [SunHee Kim \(HCT\)](#)  
**To:** [charvey-tcb@ccsemc.com](#) ; [Chris Harvey](#)  
**Cc:** [Nam-Wook Kang \(HCT\)](#) ; [khpark \(HCT\)](#) ; [mike.kuo@ccsemc.com](#) ; [chris.harvey@ccsemc.com](#)  
**Sent:** Friday, November 28, 2008 4:39 PM  
**Subject:** Re: Cal-Comp Electronics & Communications Company Limited, FCC ID: US7-A600, Assessment NO.: AN08T8595, Notice#2

Hello Chris,

We've got a response from FCC like following.  
Please find the reply in Red.  
According to their guidance, we don't need to perform the additional SAR testing.  
Please review and get back to me.

As for operational description, please find the revised file.

Should you have any further comments, please let me know asap.

Best Regards,  
SunHee Kim

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### [Inquiry Details](#)

First Inquiry Category: Radio Frequency Exposure - MPE; SAR  
Second Inquiry Category: Portable - Part 2.1093  
Third Inquiry Category:

Dear FCC,

I'm writing to get your guidance for USB dongle SAR evaluation.

The connector of Modem can not only angle at 90 degrees, 180 degrees, but can also spin around its axis to become Horizontal or Vertical oriented with respect to the computer.  
I'd like to know the specific test configurations since this device has USB connector orientations that are not covered by the FCC guidance KDB 447498.

Generally, we perform the SAR testing in Horizontal-up, Horizontal-Down, Vertical-front, Vertical-back and top positions.

But in this case, should we verify the spined positions even though we evaluate the all above orientations?

I attached the Set-up photographs to ensure that the position meets your requirements.

Horizontal USB Port + USB connector has been spined at 90 degrees.

Right side of the EUT was tested with the direct-connection to the host device, and the separation distance between EUT and Phantom is 5mm.

Should you have any questions, please feel free to contact me.

Best Regards,  
SunHee kim

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**--OET response sent on Nov 26 2008 10:57AM--**

Attached at the bottom of this response you will find an Adobe PDF file entitled *USB Dongle Guidelines*. This document details the SAR compliance test considerations for USB dongles typically encountered by the FCC Laboratory.

**If the swivel/spine occurs only at the USB connector, then 5mm SAR measurements on all 4 sides will probably satisfy testing conditions.** If the antenna is located at the tip of the USB dongle, SAR testing with the tip position against the phantom might be necessary.

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

**From:** [Chris Harvey](#)

**To:** 'SunHee Kim (HCT)'; [charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)

**Cc:** [charvey@ccsemc.com](mailto:charvey@ccsemc.com); [mike.kuo@ccsemc.com](mailto:mike.kuo@ccsemc.com)

**Sent:** Wednesday, November 26, 2008 1:01 AM

**Subject:** RE: Cal-Comp Electronics & Communications Company Limited, FCC ID: US7-A600, Assessment NO.: AN08T8595, Notice#2

Sun Hee, The FCC guidance is needed so that CCS TCB can issue the approvals. The statement at the end of their current USB Dongle guidance is:

For swivel connectors or antennas, the test orientations and configurations will need to be considered on a case-by-case basis because there could be various swiveling combinations and locking mechanisms involved that can affect test considerations.

Please obtain the full test guidance from the FCC, by providing them complete details of the device and the swivel connector. When you submit the revised test report to CCS/me, please include the correspondence and guidance information from the FCC.

Thank you for your understanding. This process is required by current FCC policy as stated in the October Workshop.

Best regards,

Chris Harvey  
[charvey@ieee.org](mailto:charvey@ieee.org)  
410-750-0860

**From:** SunHee Kim (HCT) [mailto:[alondra@hct.co.kr](mailto:alondra@hct.co.kr)]  
**Sent:** Monday, November 24, 2008 9:51 PM  
**To:** [charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)  
**Cc:** [chris.harvey@ccsemc.com](mailto:chris.harvey@ccsemc.com); [mike.kuo@ccsemc.com](mailto:mike.kuo@ccsemc.com)  
**Subject:** Re: Cal-Comp Electronics & Communications Company Limited, FCC ID: US7-A600, Assessment NO.: AN08T8595, Notice#2

Hello Chris,

If the FCC accept the test configurations for this connector spin type device, then is it available to approve by CCS TCB?

Or this project have to be approved by FCC? Then how long does it take to get the Grant?

Anyway, I'll submit an inquiry on FCC KDB website to ensure the test configurations.

If you have any comments, please let me know.

Best Regards,  
SunHee Kim

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

From: <[charvey-tcb@ccsemc.com](mailto:charvey-tcb@ccsemc.com)>

To: <[alondra@hct.co.kr](mailto:alondra@hct.co.kr)>

Cc: <[chris.harvey@ccsemc.com](mailto:chris.harvey@ccsemc.com)>; <[mike.kuo@ccsemc.com](mailto:mike.kuo@ccsemc.com)>

Sent: Monday, November 24, 2008 11:54 PM

Subject: Cal-Comp Electronics & Communications Company Limited, FCC ID: US7-A600, Assessment NO.: AN08T8595, Notice#2

> Sun Hee, thank you for your response. I have reviewed the responses and replacement exhibits and have the following items that still need to be addressed:

- >
- > 5b) my original question incorrectly listed the frequency in the operational description. Here is the corrected question:
- > 5. The RF test report indicates AWS operation at the high channel of 1753.75 MHz, but the Operational Description states 1754.25 MHz. Please confirm the actual operating frequency and update any exhibits that contain incorrect information.
- >
- > The new SAR test setup photos show a capability of the USB connector which is not in previous photographs or photos. It appears that the connector can not only angle at 90 degrees, 180 degrees, but can also spin around its axis to become Horizontal or Vertical oriented with respect to the computer. Additionally your vertical orientation shows the notebook computer spaced away from the flat phantom surface which does not meet the FCC requirement of 0cm spacing of the notebook to phantom, with <= 0.5cm spacing of the USB dongle to the phantom. Since this device has USB connector orientations that are not covered by the FCC guidance, **please contact the FCC through the Knowledge Database for testing guidance** to ensure that the test report meets their requirements. TCB applications must follow FCC guidance for testing.
- >
- > 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.
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- > Best regards,
- >
- > Chris Harvey
- > [Charvey-tcb@ccsemc.com](mailto:Charvey-tcb@ccsemc.com)
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