

Chris Harvey

From: wubinyu [binyu.wu@ritt.7layers.cn]
Sent: Thursday, December 27, 2007 12:28 AM
To: charvey-tcb@ccsemc.com
Cc: 'Lucy Tsai'; 'Yang Lixia'
Subject: RE: Longcheer Technology (Shanghai) Co., Ltd., FCC ID: VV6WM62, Assessment NO.: AN07T7436, Notice#2
Attachments: 14.Change and Modification.rar

Dear Chris,

Many thanks for your comments; please see our answer and attached documents.

Looking forward to hearing from you soon.

Thanks and Best regards,

Beverly Wu

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

From: charvey-tcb@ccsemc.com [mailto:charvey-tcb@ccsemc.com]
Sent: 2007-12-21 1:56
To: binyu.wu@ritt.7layers.cn
Cc: charvey-tcb@ccsemc.com
Subject: Longcheer Technology (Shanghai) Co., Ltd., FCC ID: VV6WM62, Assessment NO.: AN07T7436, Notice#2

Dear Beverly (Bin Yu) Wu,

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

1. In order for someone other than the applicant to submit an application for the applicant, they must be authorized by the applicant in writing. Please provide the Agent Authorization letter from Longcheer to you at ritt 7 Layers China.
[<Longcheer> please refer to <1_power of attorney>.](#)
2. The TCB Application form and test report document the FCC ID: VV6WM62 where the FCC Label shows FCC ID: VV6-WM62 (contains a '-'). Please determine the correct FCC ID for this device and submit revised exhibit(s) as needed.
[<Longcheer> please refer to <2_Phone label and location>.](#)
3. The Users Manual has the following statement which is not in accordance with FCC Requirements:

12/28/2007

For body worn operation, this Data Card has been tested and meets FCC RF exposure guidelines when used with an accessory that contains no metal and that positions the handset a minimum of 20 cms from the body (length of the data cable in accessory). Use of other accessories may not ensure compliance with FCC RF exposure guidelines. This statement is misleading because this device should not be Body-worn. Please remove this statement and replace it with a notice to the User to maintain at least 20cm to this device and its antenna.

[<Longcheer>please refer to <3_revised user manual>.](#)

4. The Internal Photos show both sides of the PC Board with all components, but there are no photographs of the inside of the enclosure, the RF Shields (shown in the RF test report), the Internal Antenna and the general construction of the inside of this device. Please update the Internal Photographs to include these items.

[<Longcheer> please refer to <4_revised internal photos>](#)

5. This device, while being a transmitter, is also classified by the FCC as a Computer Peripheral (USB connection to Computer). FCC 15.101 requires that Computer Peripherals be approved by either FCC Declaration of Conformity (DoC) or Certification. There is no FCC Logo on this label (which would be required for DoC approval) and there is no associated Certification application submitted for the Computer Peripheral portion of this device. Please indicate whether this device is DoC or Certification approved for the Computer Peripheral portion and provide the updated exhibits accordingly. If this is DoC approved, please provide the name and location of the laboratory used for this DoC Approval.

6. The RF Test Report submitted documents that this was tested according to FCC Part 22 (Oct. 2002 edition) and Part 24 (Oct 1997 edition). The FCC requires that the testing on Licensed Service devices be performed in accordance with the Measurement Procedures of EIA/TIA-603B or C (especially the substitution method). Please review all the documents above, determine if the testing was performed in accordance with EIA/TIA-603 and if the device complies with the current FCC Rules and update the exhibits accordingly.

7. The FCC has released measurement guidelines for 3G devices in their 3G SAR guidance document (can be found online at <http://gulfoss2.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=26930&switch=P>). Please review this document in detail and include all required specific references to indicate that this device was tested correctly (include specific references to the setup, power control,

8. The Antenna Details exhibit lists the gain for the 850MHz and 1900MHz bands (but does not contain any measurement plots or data) which is different than the gain details used in the MPE calculation exhibit. Also, the MPE calculation seems to list different RF output power and antenna gain for different modulations in the same band. Please explain and correct this discrepancy.

<Longcheer> please refer to the revised <8_ Antenna details>

9. The test photos show the computer connected to this device for testing, but the computer is not listed in the test report. Please update the test report accordingly.

10. Please provide the Spectrum Analyzer plots for the measurements performed in this test report and the screen-shots (showing settings) CMU 200 settings for each tested mode.

11. This device is described as having GSM/GPRS(Class12)/EDGE/WCDMA/UMTS/HDSPA/FDD(II and V), yet data has been supplied only for GPRS and WCDMA modes without any explanation. Please justify the modes selected or provide additional data as needed.

12. The FCC application form indicates that the China Telecommunication Technology Lab is accredited to ISO Guide 17025 by DaTech, where the test report indicates the accreditation is by CNAL. Please clarify and provide the Accreditation Certificate and scope.

<CTTL> please refer to <9_DATech certificate and scope_CTTL>

13. The FCC requires listing each band and modulation by the center frequency of the lowest and highest channel, RF Power, Frequency Tolerance, Emission Designator (for each unique bandwidth and modulation). Please provide a table showing this information for each band and modulation and I can update the TCB application form for you.

<Longcheer>

Frequency Range	Operating Mode	Rated RF Power output in watts	Frequency tolerance %, Hz ppm	Emission designator (see FCC 47 CFR 2.201 and 2.202)
824MHz~829MHz	GSM850	2W	±0.1ppm	290KGXW
1850MHz~1910MHz	GSM1900	1W	±0.1ppm	290KGXW
824MHz~829MHz	UMTS850	0.25W	±0.1ppm	4M20F9W
1850MHz~1910MHz	UMTS1900	0.25W	±0.1ppm	4M20F9W

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,

Chris Harvey

Charvey-tcb@ccsemc.com

12/28/2007

