

# Verykool USA INC.

## Mobile Phone

**Main Model: s400T**  
**Serial Model: N/A**




**March 05, 2014**

**Report No.: 14070039-FCC-R1**  
**(This report supersedes NONE)**



**Modifications made to the product : None**

**This Test Report is Issued Under the Authority of:**

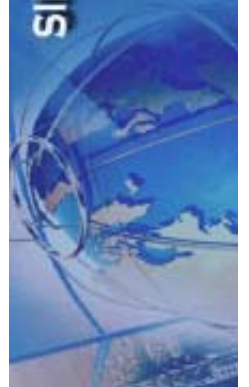
		
<b>Back Huang</b> Compliance Engineer	<b>Alex Liu</b> Technical Manager	

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**Test result presented in this test report is applicable to the representative sample only.**

# RF Test Report

To: FCC Part 22(H) & FCC Part 24(E): 2013

**SIEMIC, INC.**  
Accessing global markets



## Laboratory Introduction

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Country/Region	Scope
USA	EMC , RF/Wireless , Telecom
Canada	EMC, RF/Wireless , Telecom
Taiwan	EMC, RF, Telecom , Safety
Hong Kong	RF/Wireless ,Telecom
Australia	EMC, RF, Telecom , Safety
Korea	EMI, EMS, RF , Telecom, Safety
Japan	EMI, RF/Wireless, Telecom
Singapore	EMC , RF , Telecom
Europe	EMC, RF, Telecom , Safety

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# 1. EXECUTIVE SUMMARY & EUT INFORMATION

**The purpose of this test programmed was to demonstrate compliance of the Verykool USA INC., Mobile Phone and model: s400T against the current Stipulated Standards. The Mobile Phone has demonstrated compliance with the FCC Part 22(H) & FCC Part 24(E): 2013.**

## EUT Information

<b>EUT</b>	
<b>Description</b>	: <b>Mobile Phone</b>
<b>Main Model</b>	: <b>s400T</b> [Model s400T type A (one SIM card) & type B (two SIM card), details refer to Declaration Letter.]
<b>Serial Model</b>	: <b>N/A</b>
<b>Antenna Gain</b>	: <b>UMTS-FDD Band V/GSM850: 2 dBi</b> <b>UMTS-FDD Band II/PCS1900: 2 dBi</b> <b>Bluetooth: 1.5 dBi</b> <b>WIFI: 1.5 dBi</b>
<b>Input Power</b>	: <b>Battery:</b> <b>Model: BH-L5V</b> <b>Spec: 3.7V 1400mAh 5.18Wh</b> <b>Limited charger voltage: 4.2V</b> <b>Adapter:</b> <b>Model: UT-AB-D3A1+102Y</b> <b>Input: AC 100-240V 50/60Hz 0.15A</b> <b>Output: DC 5V 500mAh</b>
<b>Maximum Conducted AV Power to Antenna</b>	: <b>GSM850: 32.18 dBm</b> <b>PCS1900: 29.90 dBm</b> <b>UMTS-FDD Band V : 22.73 dBm</b> <b>UMTS-FDD Band II : 22.13 dBm</b>
<b>Maximum Radiated ERP/EIRP</b>	: <b>GSM850: 29.12 dBm / ERP</b> <b>PCS1900:25.95 dBm / EIRP</b> <b>UMTS-FDD Band V : 24.33dBm / ERP</b> <b>UMTS-FDD Band II : 24.77 dBm / EIRP</b>
<b>Classification Per Stipulated Test Standard</b>	: <b>FCC Part 22(H) &amp; FCC Part 24(E): 2013</b>

## 2. TECHNICAL DETAILS

<b>Purpose</b>	<b>Compliance testing of Mobile Phone with stipulated standard</b>
<b>Applicant / Client</b>	<b>Verykool USA INC. 3636 Nobel Drive, Suite 325, San Diego, CA 92122</b>
<b>Manufacturer</b>	<b>Wingtech Group 6F G Area Beijing road east 668, high-tech king world, Wingtech Group, Shanghai, China 200001</b>
<b>Laboratory performing the tests</b>	<b>SIEMIC (Shenzhen - China) Laboratories Zone A, Floor 1, Building 2, Wan Ye Long Technology Park, South Side of Zhoushi Road, Bao'an District, Shenzhen, Guangdong, China Tel: +86-0755-2601 4629 / 2601 4953 Fax: +86-0755-2601 4953-810 Email:China@siemic.com</b>
<b>Test report reference number</b>	<b>14070039-FCC-R1</b>
<b>Date EUT received</b>	<b>February 15, 2014</b>
<b>Standard applied</b>	<b>FCC Part 22(H) &amp; FCC Part 24(E): 2013</b>
<b>Dates of test</b>	<b>March 03, 2014</b>
<b>No of Units</b>	<b>#1</b>
<b>Equipment Category</b>	<b>PCE</b>
<b>Trade Name</b>	<b>Verykool</b>
<b>RF Operating Frequency (ies)</b>	<b>GSM850 TX : 824.2 ~ 848.8 MHz; RX : 869.2 ~ 893.8 MHz PCS1900 TX : 1850.2 ~ 1909.8 MHz; RX : 1930.2 ~ 1989.8 MHz UMTS-FDD Band V TX : 826.4 ~ 846.6 MHz; RX : 871.4 ~ 891.6 MHz UMTS-FDD Band II TX : 1852.4 ~ 1907.6 MHz; RX : 1932.4 ~ 1987.6 MHz 802.11b/g/n: 2412-2462 MHz Bluetooth &amp; BLE: 2402-2480 MHz</b>
<b>Number of Channels</b>	<b>299CH (PCS1900) and 124CH (GSM850) UMTS-FDD Band V : 102CH UMTS-FDD Band II : 277CH Bluetooth: 79CH 802.11b/g/n: 11CH BLE: 40CH</b>
<b>Modulation</b>	<b>GSM / GPRS: GMSK UMTS-FDD: QPSK 802.11b/g/n: DSSS/OFDM Bluetooth: GFSK &amp; <math>\pi/4</math>QPSK &amp; 8DPSK BLE: GFSK</b>
<b>GPRS Multi-slot class</b>	<b>8/10/12</b>
<b>FCC ID</b>	<b>WA6S400T</b>

# 3 MODIFICATION

NONE

### 3. TEST SUMMARY

**The product was tested in accordance with the following specifications.  
 All testing has been performed according to below product classification:**

**PCE**

**Test Results Summary**

Test Standard	Description	Product Class	Pass / Fail
§ 1.1307, § 2.1093	RF Exposure (SAR)	See Above	Pass
§ 2.1046; § 22.913 (a); § 24.232 (c)	RF Output Power	See Above	Pass
§ 2.1047	Modulation Characteristics	See Above	N/A
§ 2.1049; § 22.905 § 22.917; § 24.238	99% & -26 dB Occupied Bandwidth	See Above	Pass
§ 2.1051, § 22.917 (a); § 24.238 (a)	Spurious Emissions at Antenna Terminal	See Above	Pass
§ 2.1053 § 22.917 (a); § 24.238 (a)	Field Strength of Spurious Radiation	See Above	Pass
§ 22.917 (a); § 24.238 (a)	Out of band emission, Band Edge	See Above	Pass
§ 2.1055 § 22.355; § 24.235	Frequency stability vs. temperature Frequency stability vs. voltage	See Above	Pass

*Note: Testing was performed by configuring EUT to maximum output power status, the declared output power class for different.*

The product, Mobile Phone, Model: s400 and s400T. These two models are electrically and mechanically identical, share the same PCB Layout and components. And the difference between them is s400T has no Band 1 of 3G frequencies (removed related PA of WCDMA Band 1, kept the other parts unchanged). And s400T includes single card slot and dual card slot, share the same PCB Layout and components, no other differences except the quantity of card slots. These changes do not affect the test items of license function. Details were explained in the Declaration letter from customer.  
 The test data please refer to report 13070137-FCC-R1.



## **4. MEASUREMENTS, EXAMINATION AND DERIVED RESULTS**

### **5.1 §1.1307, §2.1093- RF Exposure (SAR)**

**Test Result: Pass**

The EUT is a portable device, thus requires SAR evaluation;  
please refer to SIEMIC SAR Report: 14070039-FCC-H

## **5.2 §2.1046; §22.913 (a); §24.232 (c)- RF Output Power**

1. **Conducted Measurement**  
EUT was set for low, mid, high channel with modulated mode and highest RF output power. The spectrum analyzer was connected to the antenna terminal.
2. **Conducted Emissions Measurement Uncertainty**  
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is  $\pm 1.5$ dB.
3. **Environmental Conditions**

Temperature	25°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
4. Test date : June 06, 2013  
Tested By : Back Huang

### **Procedures:**

#### **For Conducted Power:**

1. The transmitter output port was connected to base station.
2. Set EUT at maximum power through base station.
3. Select lowest, middle, and highest channels for each band and different test mode.

#### **For ERP/EIRP:**

1. The transmitter was placed on a wooden turntable, and it was transmitting into a non-radiating load which was also placed on the turntable.
2. The measurement antenna was placed at a distance of 3 meters from the EUT. During the tests, the antenna height and polarization as well as EUT azimuth were varied in order to identify the maximum level of emissions from the EUT. The test was performed by placing the EUT on 3-orthogonal axis.
3. The frequency range up to tenth harmonic of the fundamental frequency was investigated.
4. Remove the EUT and replace it with substitution antenna. A signal generator was connected to the substitution antenna by a non-radiating cable. The absolute levels of the spurious emissions were measured by the substitution.

Spurious emissions in dB =  $10 \lg(\text{TXpwr in Watts}/0.001)$  – the absolute level

Spurious attenuation limit in dB =  $43 + 10 \text{Log}_{10}(\text{power out in Watts})$

### **Test Result: Pass**

**Remark:** Conducted Burst Average power for reporting purposes only

*Note: The following test data please refer to report 13070137-FCC-R1.*

**Conducted Power**

**GSM Mode:**

Burst Average Power (dBm);								
Band	GSM850				GSM1900			
Channel	128	190	251	Tune up Power tolerant	512	661	810	Tune up Power tolerant
Frequency (MHz)	824.2	836.6	848.8	/	1850.2	1880	1909.8	/
GSM Voice (1 uplink),GMSK	31.95	32.10	<b>32.18</b>	32±1	29.41	29.64	<b>29.90</b>	30±1
GPRS Multi-Slot Class 8 (1 uplink),GMSK	31.93	32.06	32.13	32±1	29.40	29.61	29.87	30±1
GPRS Multi-Slot Class 10 (2 uplink),GMSK	30.12	30.28	30.36	30±1	27.02	27.35	27.61	28±1
GPRS Multi-Slot Class 12 (4 uplink),GMSK	26.72	26.85	26.93	27±1	24.73	25.08	25.36	25±1
Remark : GPRS, CS1 coding scheme. Multi-Slot Class 8 , Support Max 4 downlink, 1 uplink , 5 working link Multi-Slot Class 10 , Support Max 4 downlink, 2 uplink , 5 working link Multi-Slot Class 12 , Support Max 4 downlink, 4 uplink , 5 working link								

**Note: Since GSM mode has higher power, so the test items below were not performed to GPRS mode.**

## UMTS Mode:

### UMTS-FDD Band V

Band/ Time Slot configuration	Channel	Frequency	Peak power (dBm)	Average power (dBm)
RMC 12.2kbps	4132	826.4	22.70	22.57
	4175	835.0	22.62	22.55
	4233	846.6	22.80	22.72
HSDPA Subtest1	4132	826.4	22.68	22.57
	4175	835.0	22.58	22.53
	4233	846.6	22.78	22.71
HSDPA Subtest2	4132	826.4	22.70	22.56
	4175	835.0	22.63	22.55
	4233	846.6	22.78	22.70
HSDPA Subtest3	4132	826.4	22.66	22.54
	4175	835.0	22.61	22.55
	4233	846.6	22.75	22.68
HSDPA Subtest4	4132	826.4	22.70	22.56
	4175	835.0	22.58	22.52
	4233	846.6	22.77	22.70
HSUPA Subtest1	4132	826.4	22.71	22.58
	4175	835.0	22.64	22.56
	4233	846.6	22.79	22.73
HSUPA Subtest2	4132	826.4	22.66	22.53
	4175	835.0	22.57	22.51
	4233	846.6	22.75	22.67
HSUPA Subtest3	4132	826.4	22.71	22.58
	4175	835.0	22.60	22.54
	4233	846.6	22.79	<b>22.73</b>
HSUPA Subtest4	4132	826.4	22.67	22.55
	4175	835.0	22.62	22.55
	4233	846.6	22.80	22.71
HSUPA Subtest5	4132	826.4	22.65	22.53
	4175	835.0	22.58	22.52
	4233	846.6	22.75	22.69

## UMTS-FDD Band II

Band/ Time Slot configuration	Channel	Frequency	Peak power (dBm)	Average power (dBm)
RMC 12.2kbps	9262	1852.4	22.10	22.04
	9400	1880.0	22.16	22.11
	9538	1907.6	22.90	21.84
HSDPA Subtest1	9262	1852.4	22.12	22.06
	9400	1880.0	22.18	<b>22.13</b>
	9538	1907.6	22.91	21.86
HSDPA Subtest2	9262	1852.4	22.10	22.02
	9400	1880.0	22.14	22.10
	9538	1907.6	22.87	21.82
HSDPA Subtest3	9262	1852.4	22.08	22.01
	9400	1880.0	22.13	22.09
	9538	1907.6	22.91	21.85
HSDPA Subtest4	9262	1852.4	22.11	22.04
	9400	1880.0	22.14	22.12
	9538	1907.6	22.86	21.81
HSUPA Subtest1	9262	1852.4	22.12	22.05
	9400	1880.0	22.15	22.12
	9538	1907.6	22.90	21.85
HSUPA Subtest2	9262	1852.4	22.08	22.01
	9400	1880.0	22.14	22.10
	9538	1907.6	22.88	21.83
HSUPA Subtest3	9262	1852.4	22.06	22.00
	9400	1880.0	22.10	22.04
	9538	1907.6	22.84	21.76
HSUPA Subtest4	9262	1852.4	22.07	21.97
	9400	1880.0	22.13	22.10
	9538	1907.6	22.87	21.82
HSUPA Subtest5	9262	1852.4	22.05	21.96
	9400	1880.0	22.08	22.01
	9538	1907.6	22.82	21.75

**ERP & EIRP (worst case)**  
**ERP for Cellular Band (Part 22H)**

Frequency (MHz)	Substituted level (dBm)	Antenna Polarization	Antenna Gain correction (dBi)	Cable Loss (dB)	Absolute Level (dBm)	Limit (dBm)
824.2	20.28	V	6.8	0.53	26.55	38.45
824.2	22.72	H	6.8	0.53	28.99	38.45
836.6	20.34	V	6.8	0.53	26.61	38.45
836.6	22.58	H	6.8	0.53	28.85	38.45
848.8	20.23	V	6.9	0.53	26.60	38.45
848.8	22.75	H	6.9	0.53	<b>29.12</b>	38.45

**EIRP for PCS Band (Part 24E)**

Frequency (MHz)	Substituted level (dBm)	Antenna Polarization	Antenna Gain correction (dBi)	Cable Loss (dB)	Absolute Level (dBm)	Limit (dBm)
1850.2	15.46	V	7.88	0.85	22.49	33
1850.2	18.69	H	7.88	0.85	25.72	33
1880	15.53	V	7.88	0.85	22.56	33
1880	18.92	H	7.88	0.85	<b>25.95</b>	33
1909.8	15.48	V	7.86	0.85	22.49	33
1909.8	18.87	H	7.86	0.85	25.88	33

**ERP for UMTS-FDD Band V (Part 22H)**

Frequency (MHz)	Substituted level (dBm)	Antenna Polarization	Antenna Gain correction (dBi)	Cable Loss (dB)	Absolute Level (dBm)	Limit (dBm)
826.40	15.26	V	6.8	0.53	21.53	33
826.40	17.35	H	6.8	0.53	23.62	33
835.00	15.65	V	6.8	0.53	21.92	33
835.00	17.52	H	6.8	0.53	23.79	33
846.60	15.02	V	6.9	0.53	21.39	33
846.60	17.96	H	6.9	0.53	<b>24.33</b>	33

**EIRP for UMTS-FDD Band II (Part 24E)**

Frequency (MHz)	Substituted level (dBm)	Antenna Polarization	Antenna Gain correction (dBi)	Cable Loss (dB)	Absolute Level (dBm)	Limit (dBm)
1852.40	15.35	V	7.88	0.85	22.38	33
1852.40	17.41	H	7.88	0.85	24.44	33
1880.00	15.52	V	7.88	0.85	22.55	33
1880.00	17.67	H	7.88	0.85	24.7	33
1907.60	15.13	V	7.86	0.85	22.14	33
1907.60	17.76	H	7.86	0.85	<b>24.77</b>	33

### **5.3 §2.1047 - Modulation Characteristic**

According to FCC § 2.1047(d), Part 22H & 24E there is no specific requirement for digital modulation, therefore modulation characteristic is not presented.

## 5.4 §2.1049, §22.917, §22.905 & §24.238 - Occupied Bandwidth

1. Conducted Measurement  
EUT was set for low, mid, high channel with modulated mode and highest RF output power. The spectrum analyser was connected to the antenna terminal.
2. Environmental Conditions

Temperature	26°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
3. Conducted Emissions Measurement Uncertainty  
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is ±1.5dB.
4. Test date : June 18, 2013 - June 21, 2013  
Tested By : Back Huang

### Procedures:

1. The EUT was connected to Spectrum Analyzer and Base Station via power divider.
2. The 99% and 26 dB occupied bandwidth (BW) of the middle channel for the highest RF powers.

### Test Results: Pass

*Note: The following test data please refer to report 13070137-FCC-R1.*

Cellular Band (Part 22H)

Channel	Frequency (MHz)	99% Occupied Bandwidth (kHz)	26 dB Bandwidth (kHz)
128	824.2	247.0654	322.132
190	836.6	244.3291	313.241
251	848.8	239.4829	309.288

PCS Band (Part 24E)

Channel	Frequency (MHz)	99% Occupied Bandwidth (kHz)	26 dB Bandwidth (kHz)
512	1850.2	241.0087	315.632
661	1880.0	243.9758	313.962
810	1909.8	246.0761	320.605



UMTS-FDD Band V (Part 22H)

Channel	Frequency (MHz)	99% Occupied Bandwidth (MHz)	26 dB Bandwidth (MHz)
4132	826.4	4.1529	4.724
4175	835.0	4.1637	4.704
4233	846.6	4.1556	4.703

UMTS-FDD Band II (Part 24E)

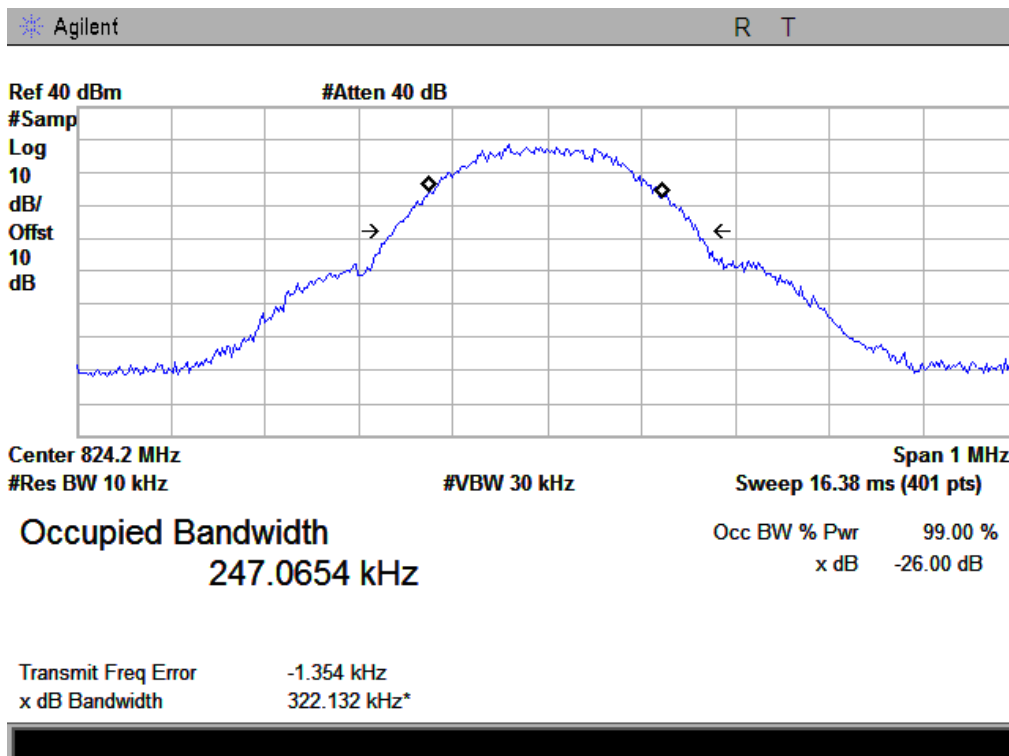
Channel	Frequency (MHz)	99% Occupied Bandwidth (MHz)	26 dB Bandwidth (MHz)
9262	1852.4	4.1531	4.708
9400	1880.0	4.1530	4.716
9538	1907.6	4.1625	4.717

Please refer to the following plots.

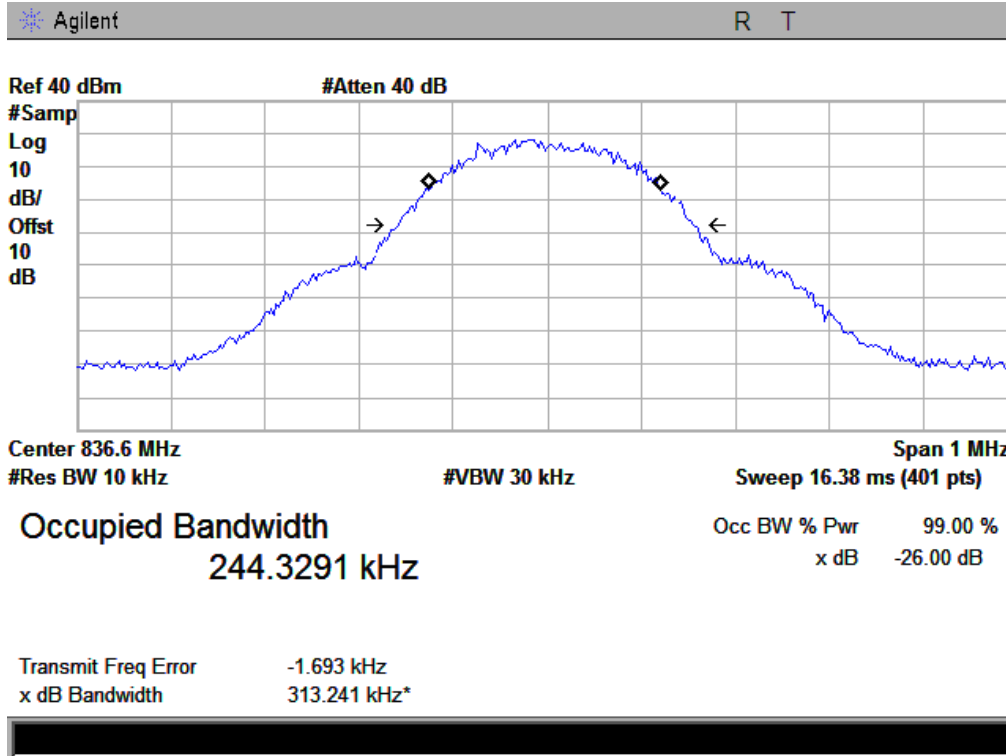
Cellular Band (Part 22H)

**99% Occupied Bandwidth & 26 dB Bandwidth**

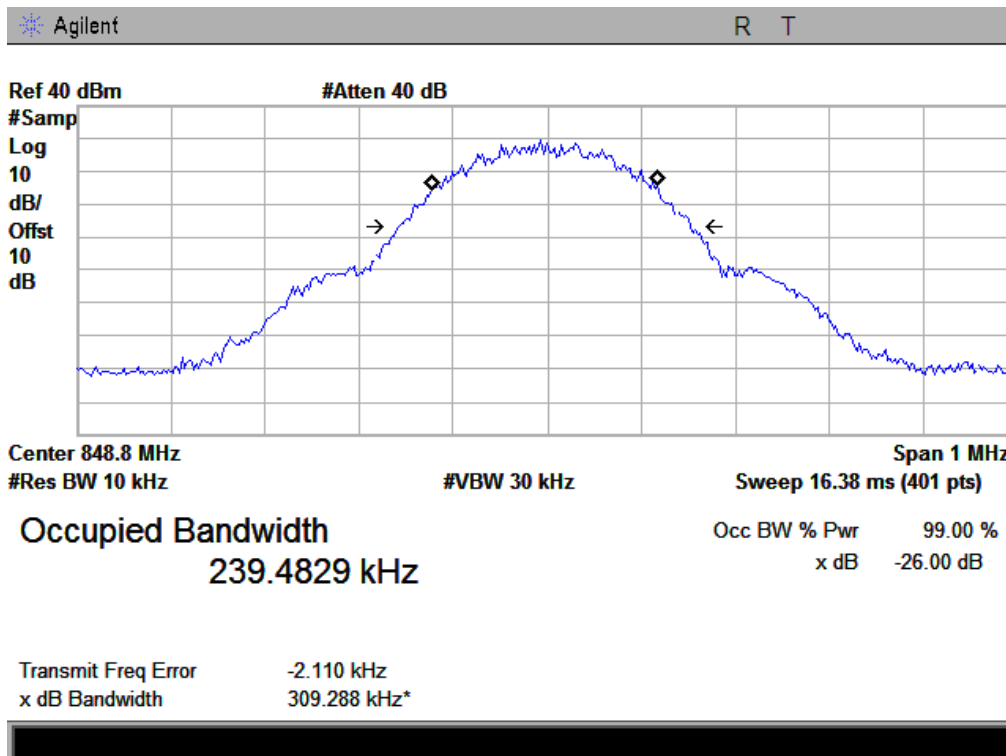
Low Channel



### Middle Channel

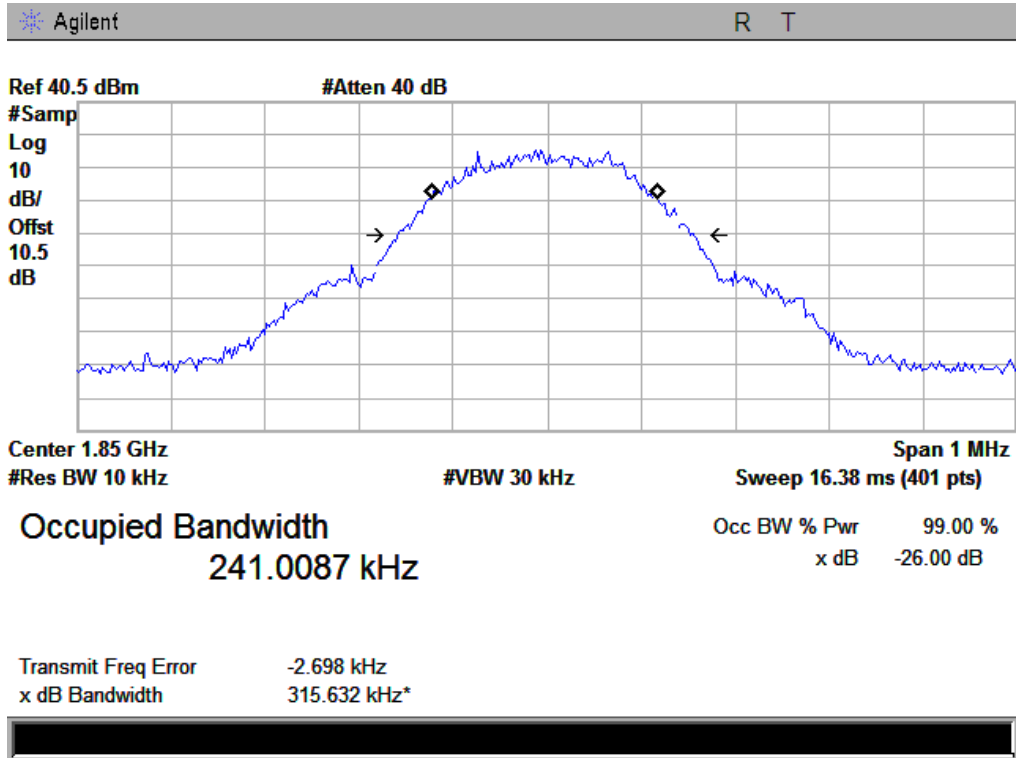


### High Channel

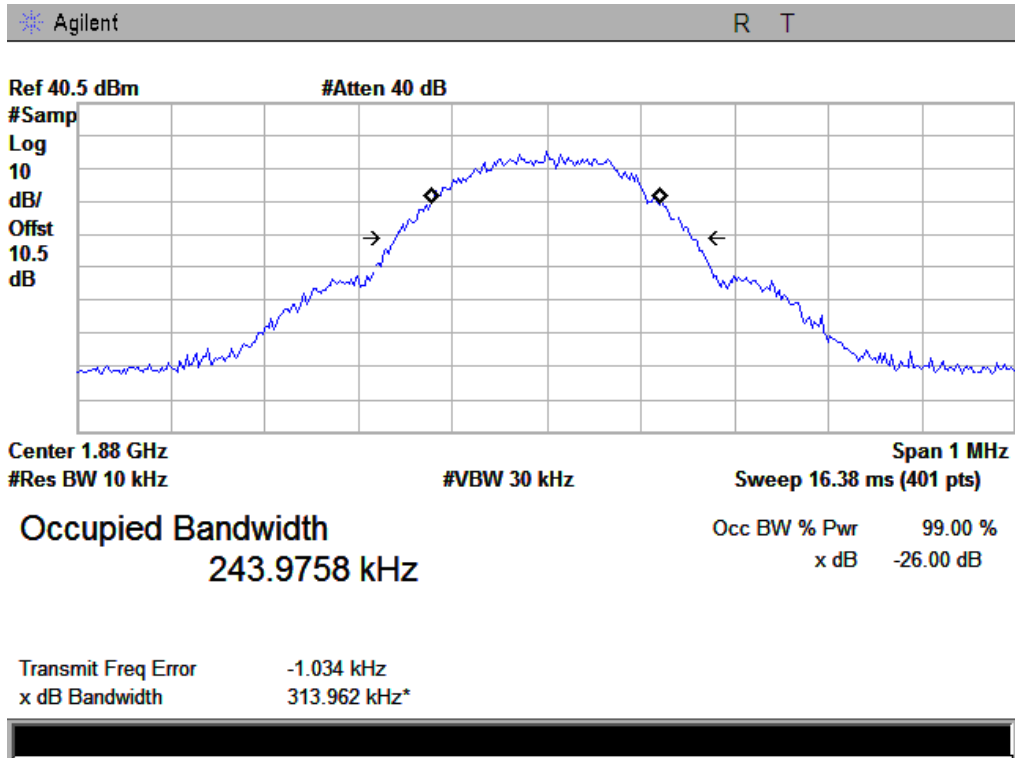


PCS Band (Part 24E)

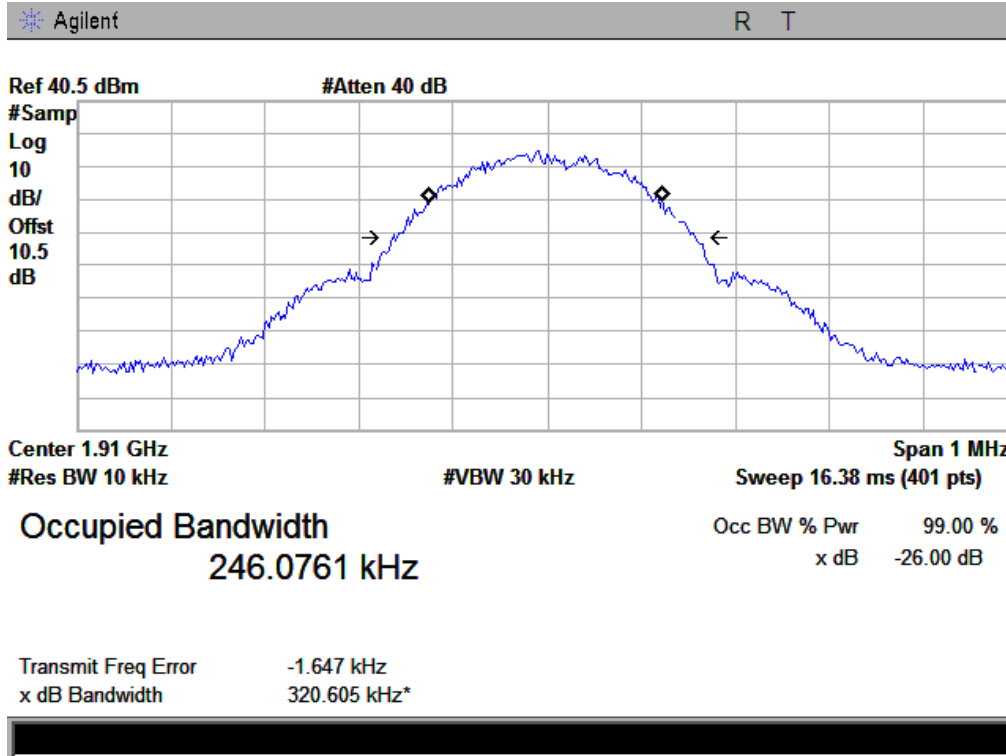
**99% Occupied Bandwidth & 26 dB Bandwidth  
Low Channel**



**Middle Channel**



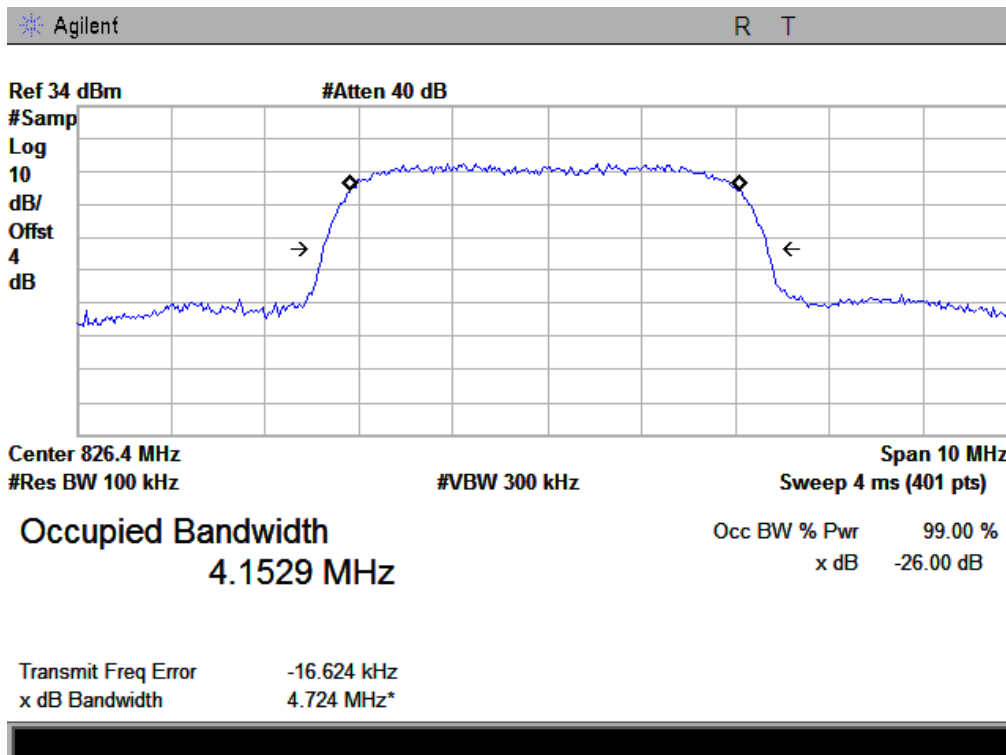
### High Channel



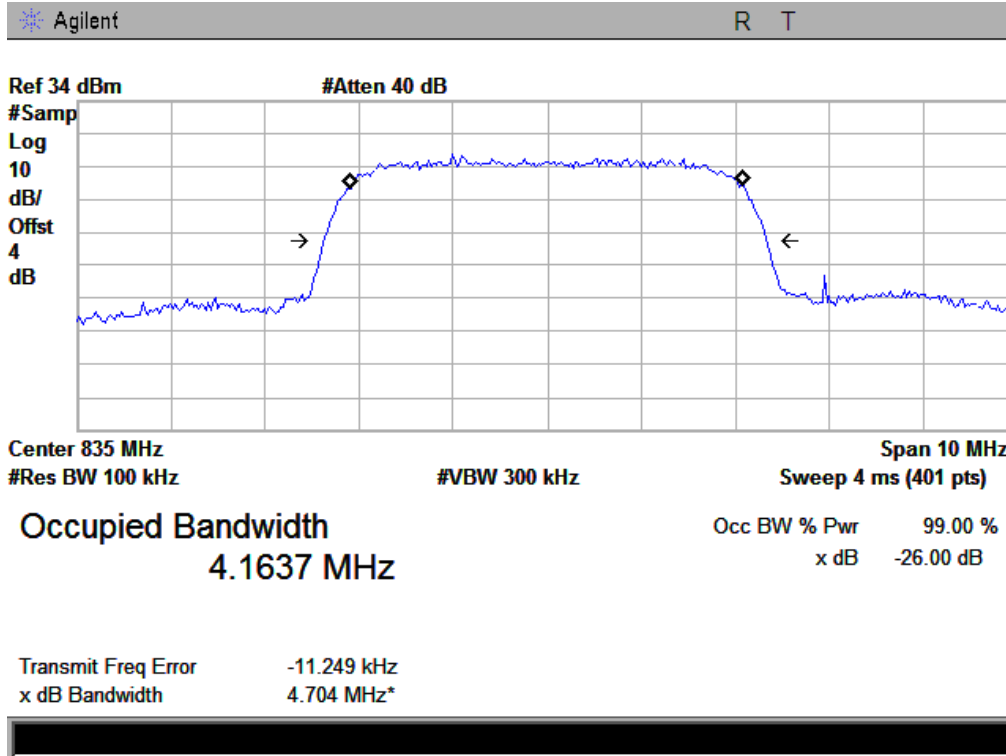
### UMTS-FDD Band V (Part 22H)

#### 99% Occupied Bandwidth & 26 dB Bandwidth

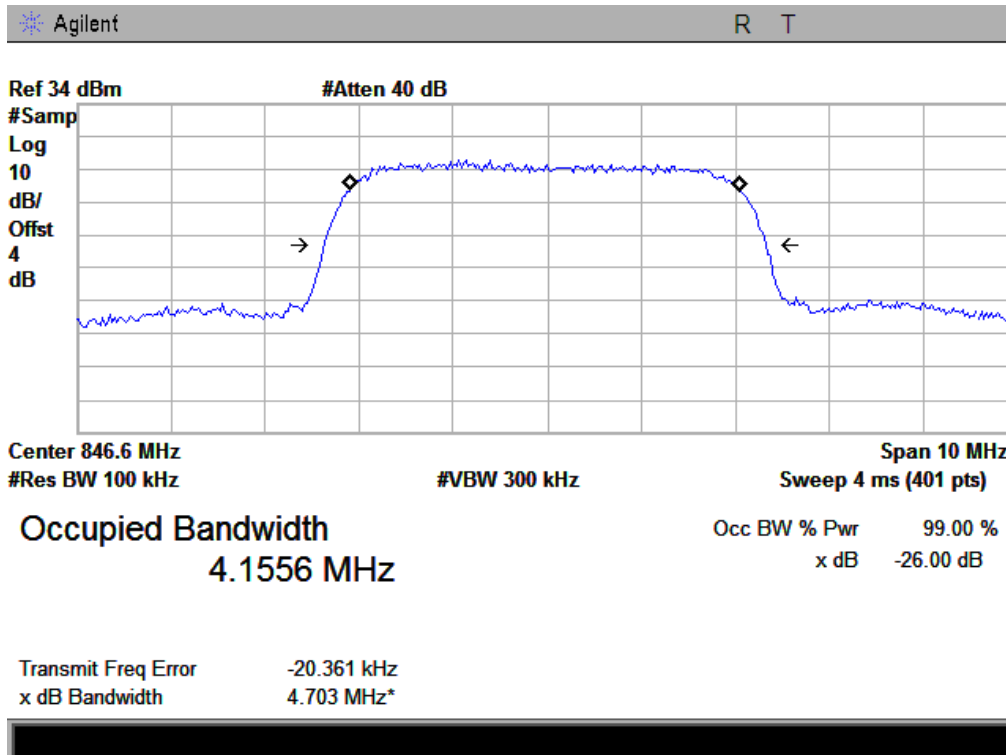
### Low Channel



### Middle Channel



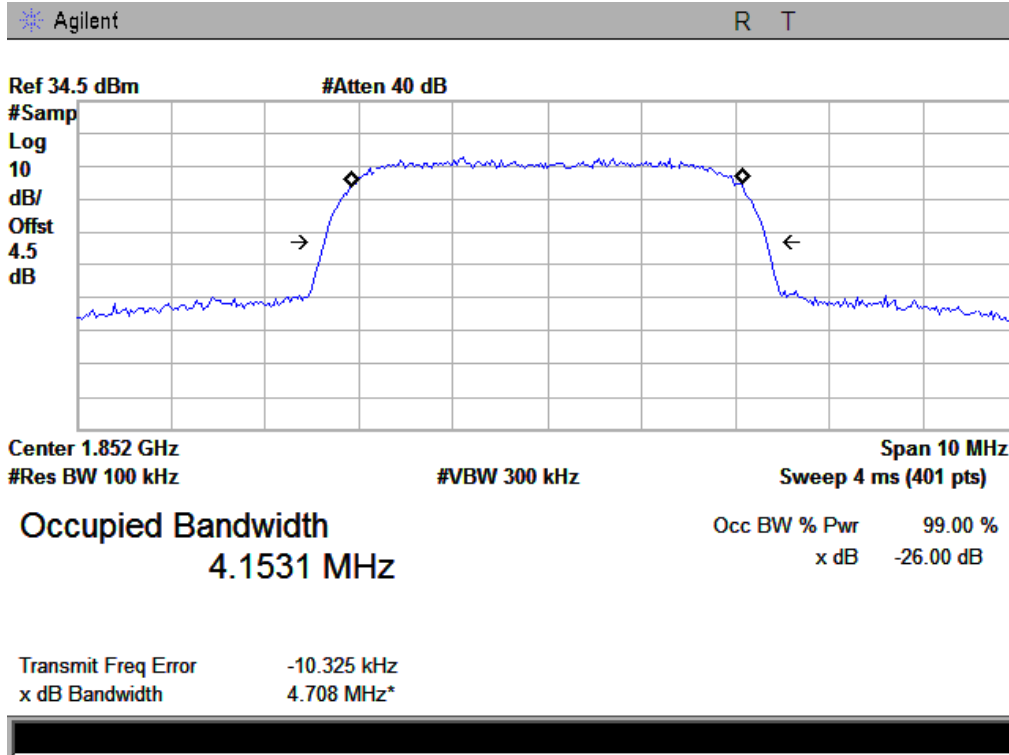
### High Channel



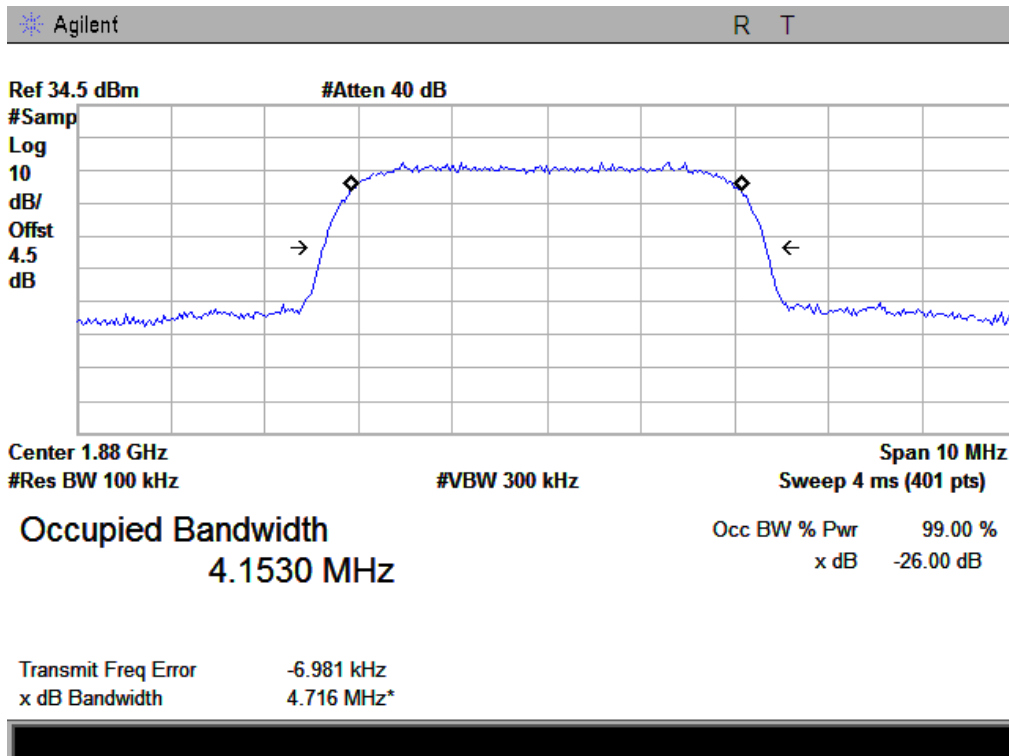
MTS-FDD Band II (Part 24E)

99% Occupied Bandwidth & 26 dB Bandwidth

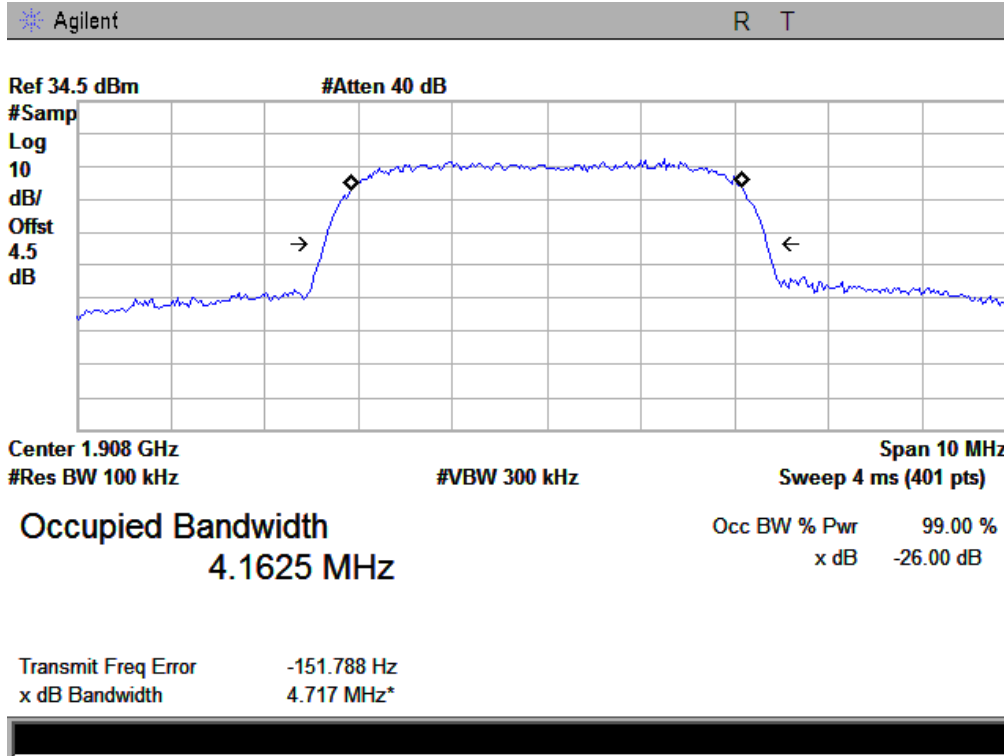
Low Channel



Middle Channel



### High Channel



## **5.5 §2.1051, §22.917(a) & §24.238(a) - Spurious Emissions at Antenna Terminals**

1. Conducted Measurement  
EUT was set for low, mid, high channel with modulated mode and highest RF output power.  
The spectrum analyzer was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty  
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is  $\pm 1.5$ dB.
3. Environmental Conditions
 

Temperature	25°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
4. Test date : June 18, 2013 - June 21, 2013  
Tested By : Back Huang

### **Standard Requirement:**

The power of any emission outside of the authorized operating frequency ranges must be lower than the transmitter power (P) by a factor of at least  $43 + 10 \log (P)$  dB.

### **Procedures:**

1. The EUT was connected to Spectrum Analyzer and Base Station via power divider.
2. The Band Edges of low and high channels for the highest RF powers were measured. Setting RBW as roughly BW/100.

### **Test Result: Pass**

Refer to the attached plots.

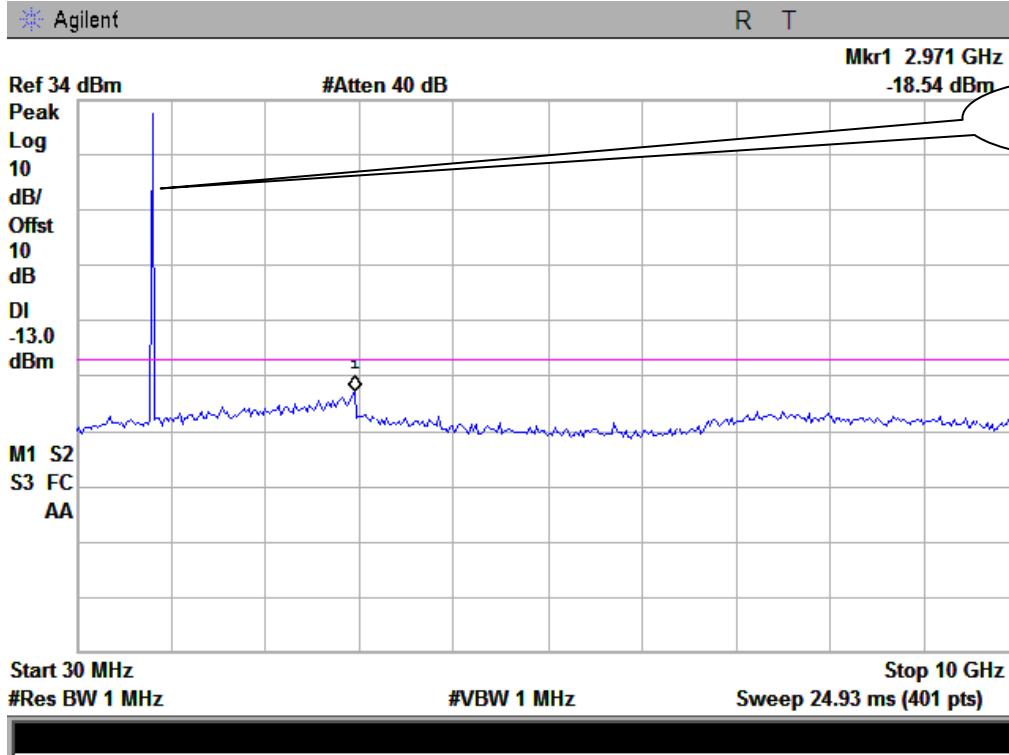
*Note: The following test data please refer to report 13070137-FCC-R1.*



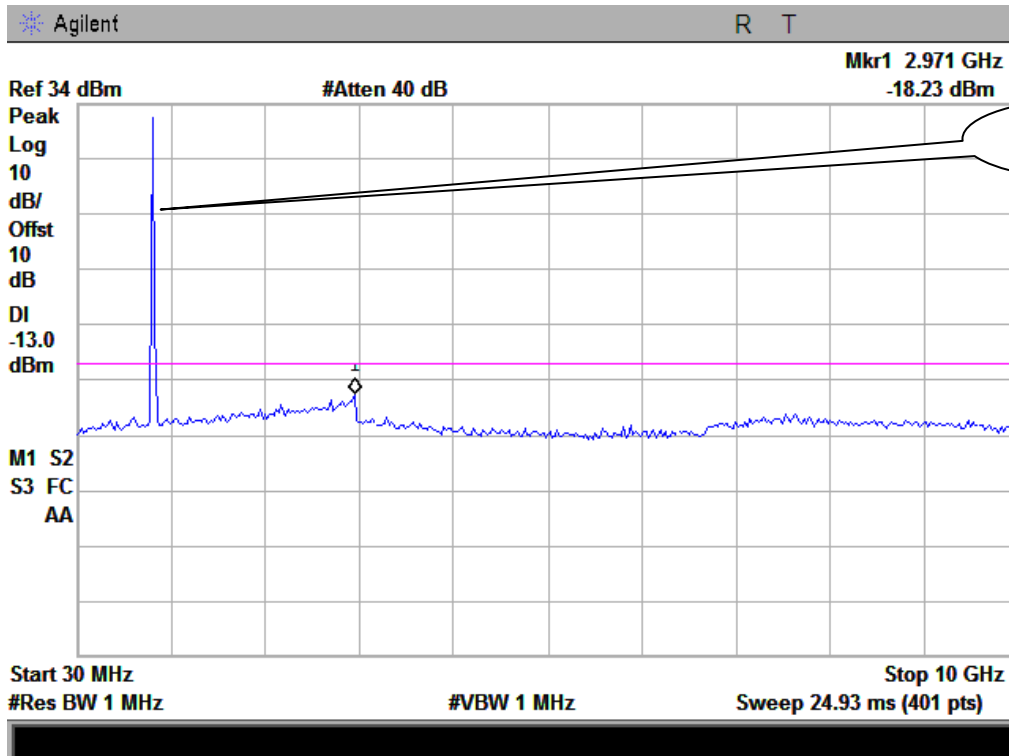
**Cellular Band (Part 22H)**

30MHz-10G – GSM850

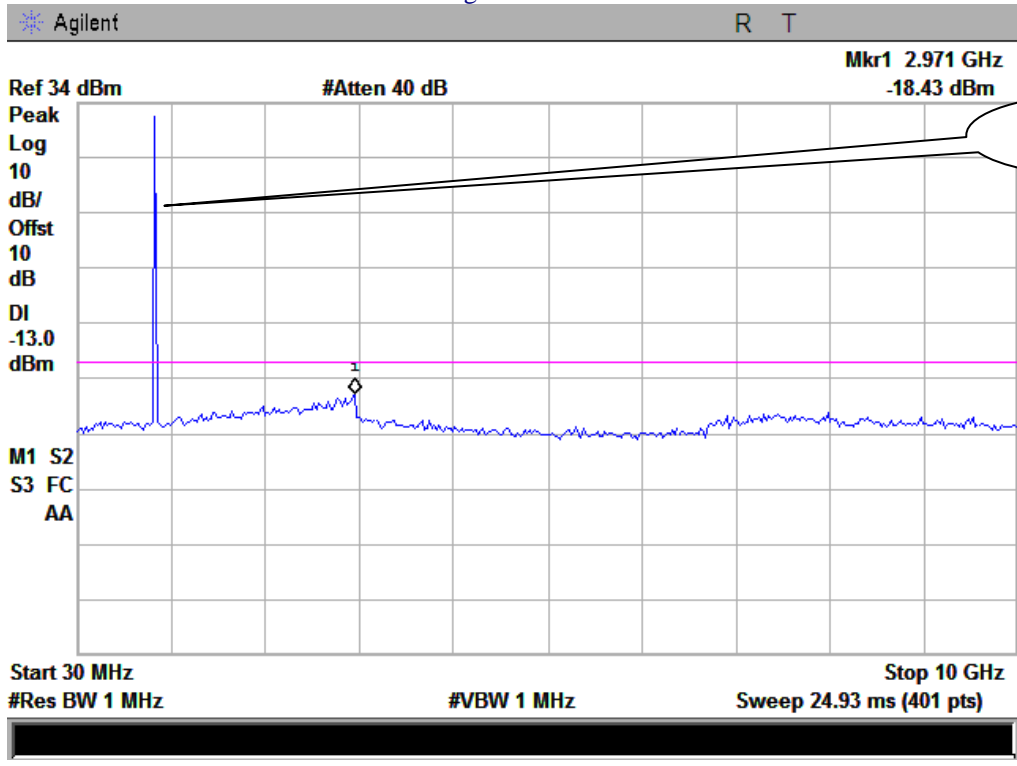
Low Channel



Middle Channel



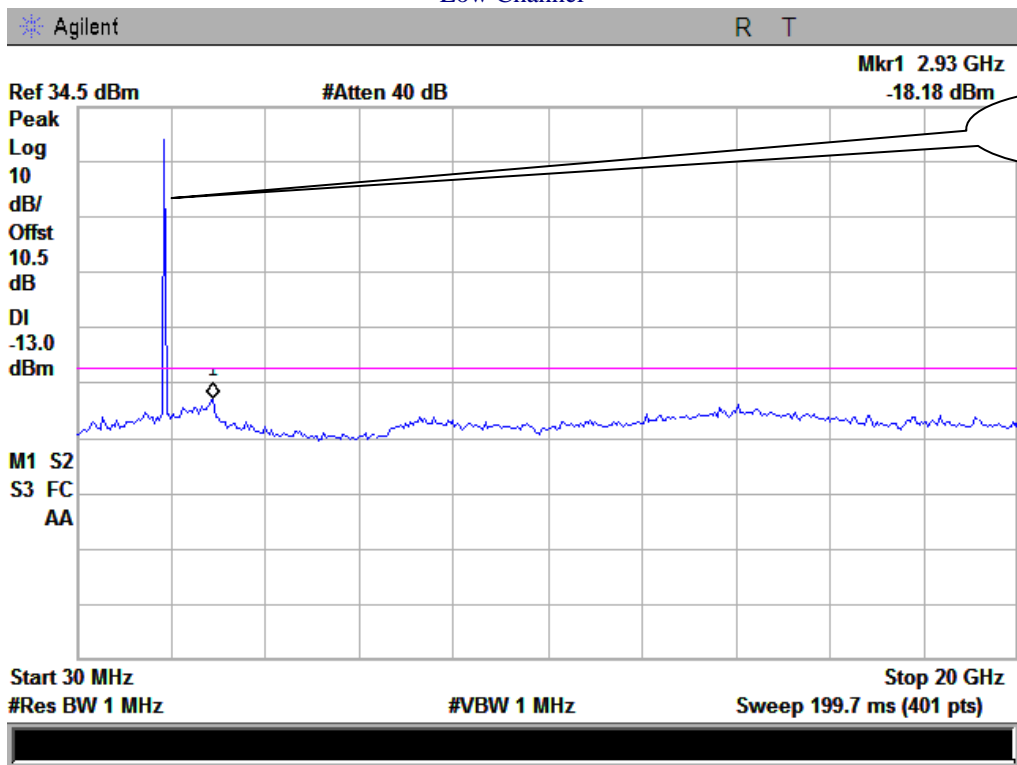
### High Channel



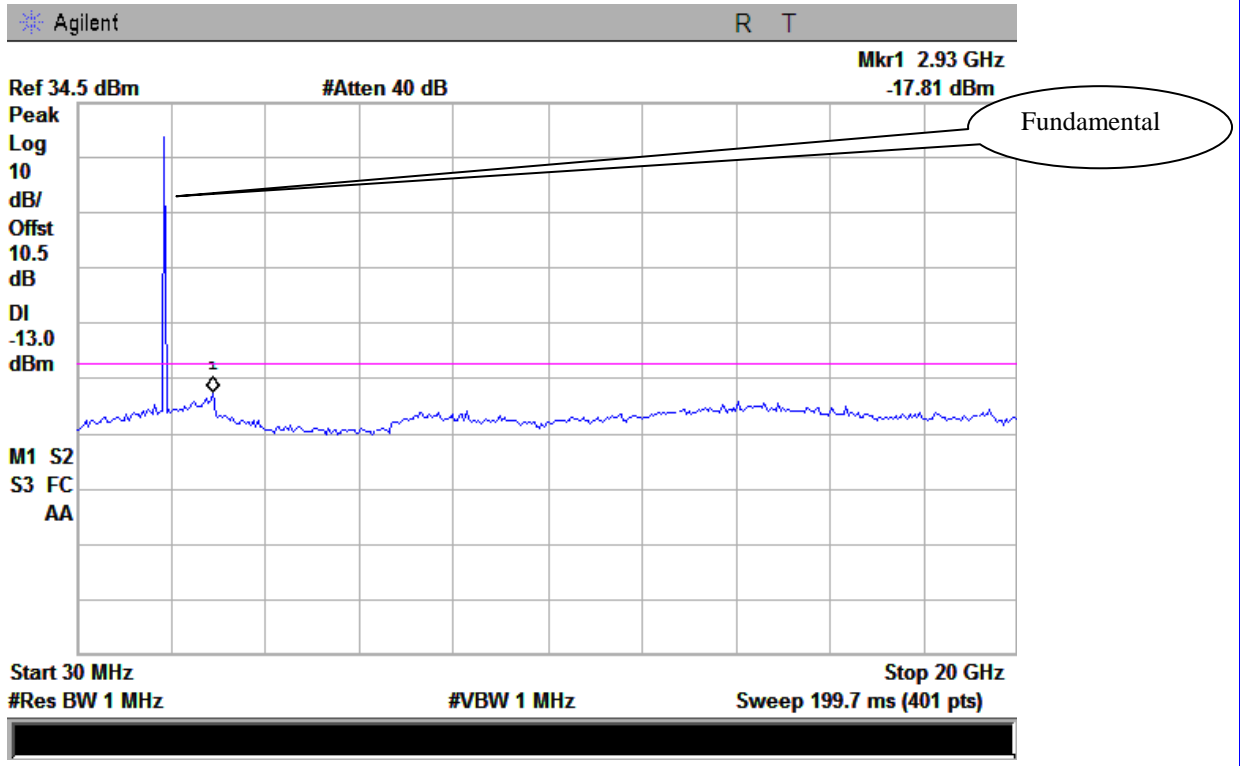
### PCS Band (Part24E)

30MHz-20G – PCS1900

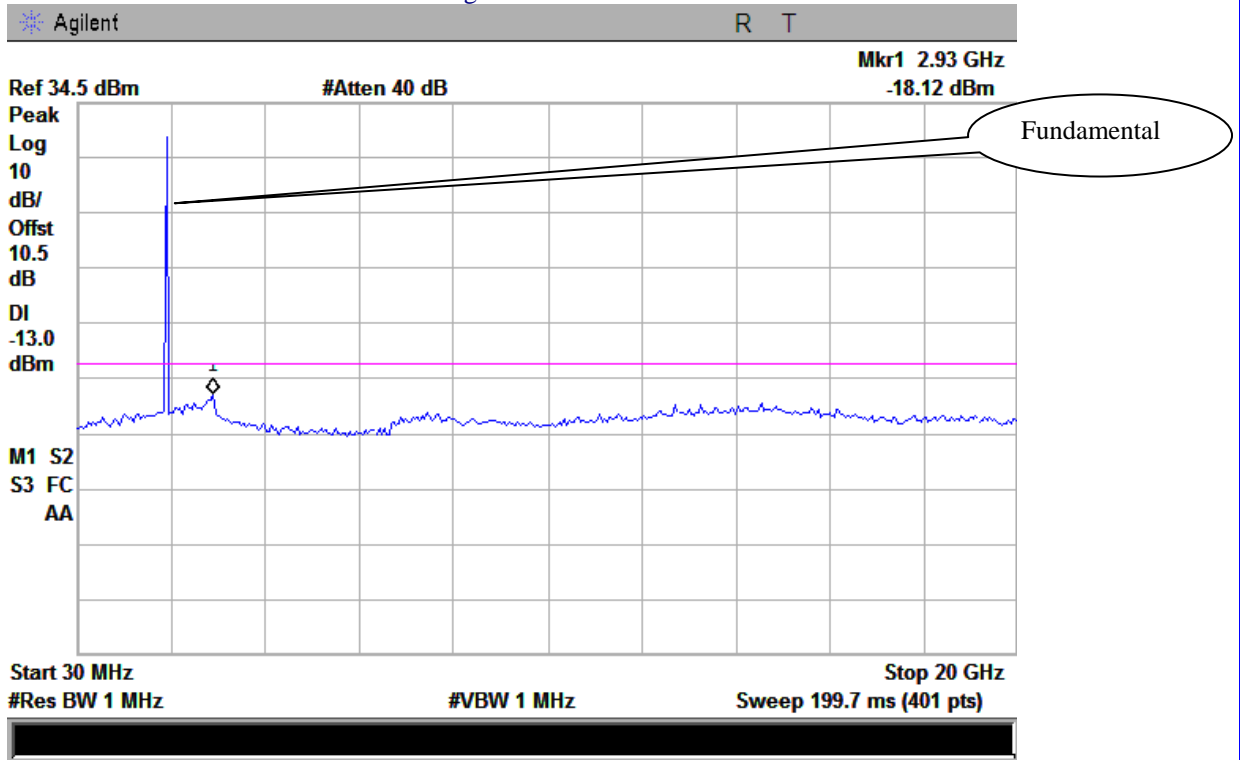
### Low Channel



### Middle Channel



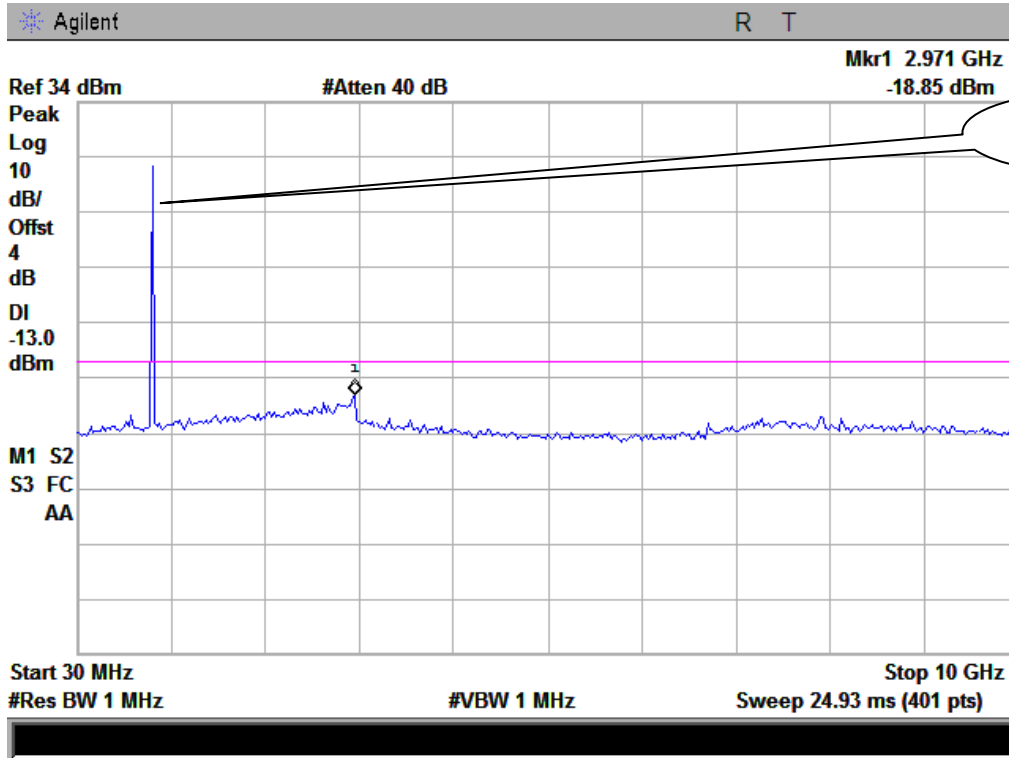
### High Channel



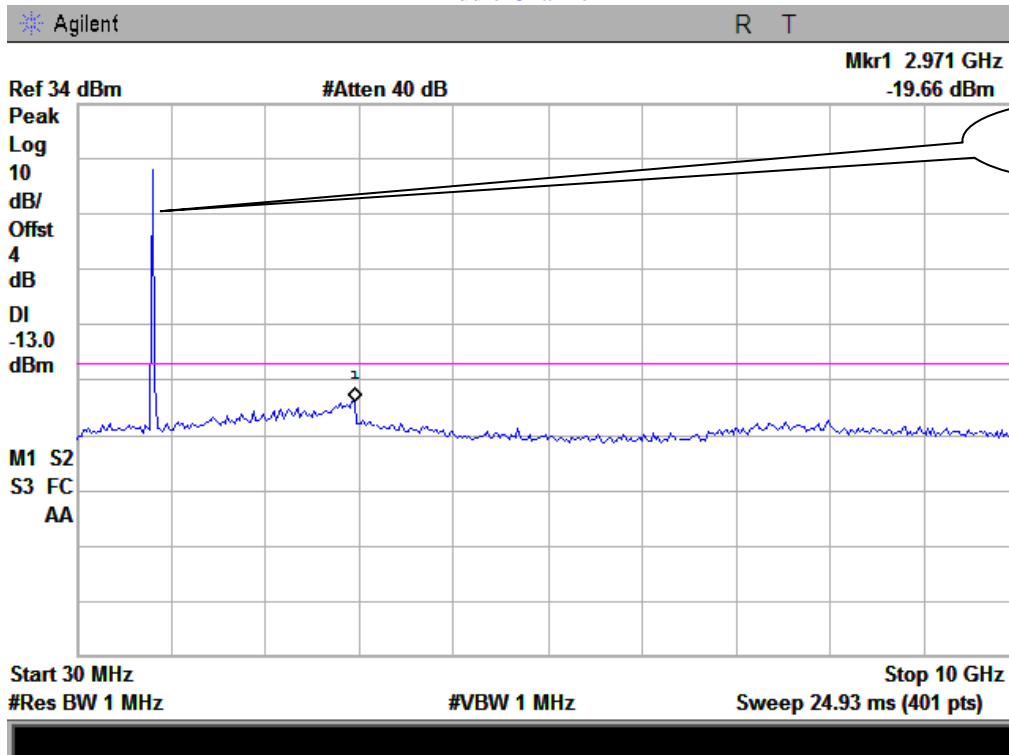
**UMTS-FDD Band V (Part 22H)**

30MHz-10G – WCDMA 850

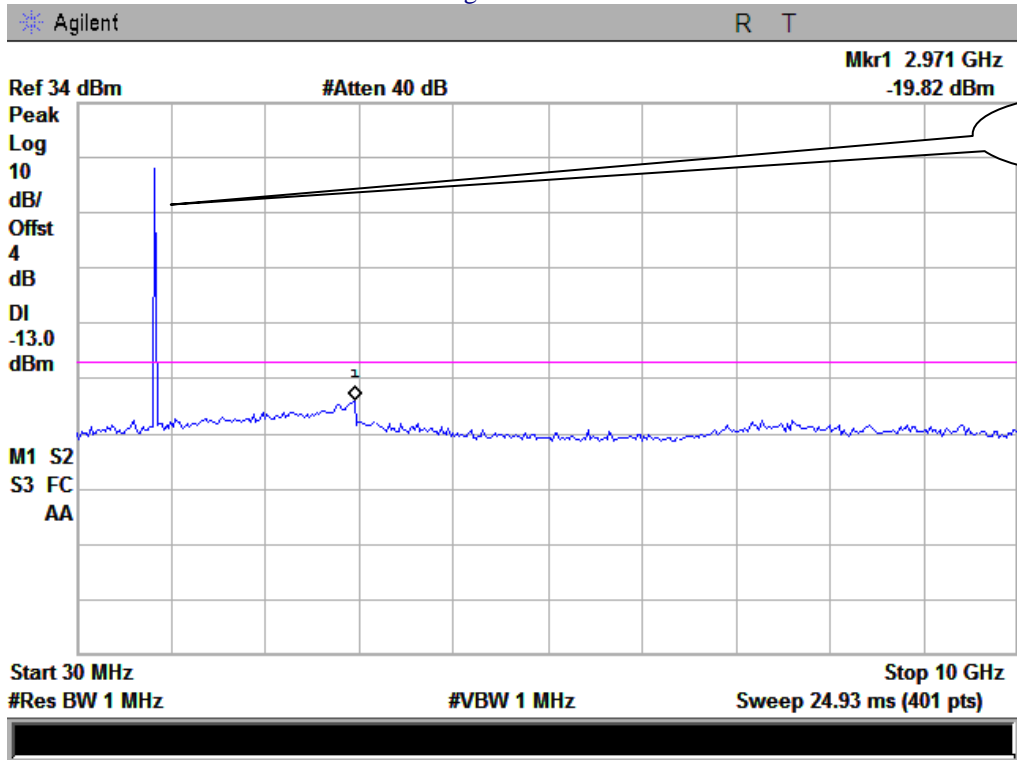
Low Channel



Middle Channel



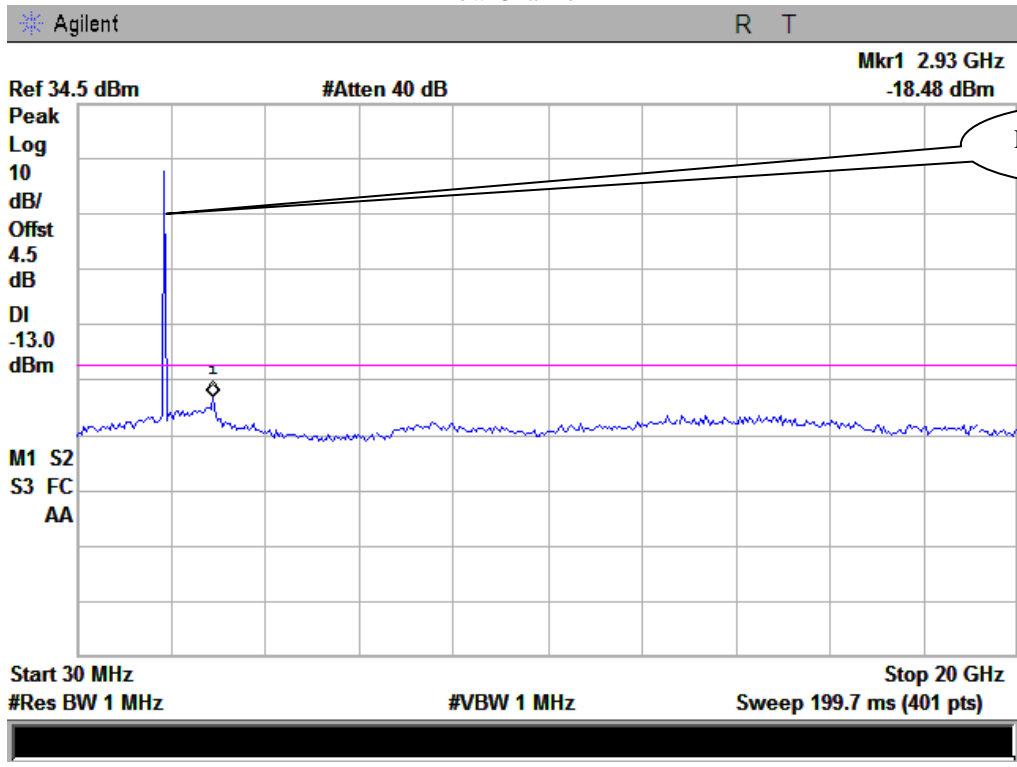
### High Channel



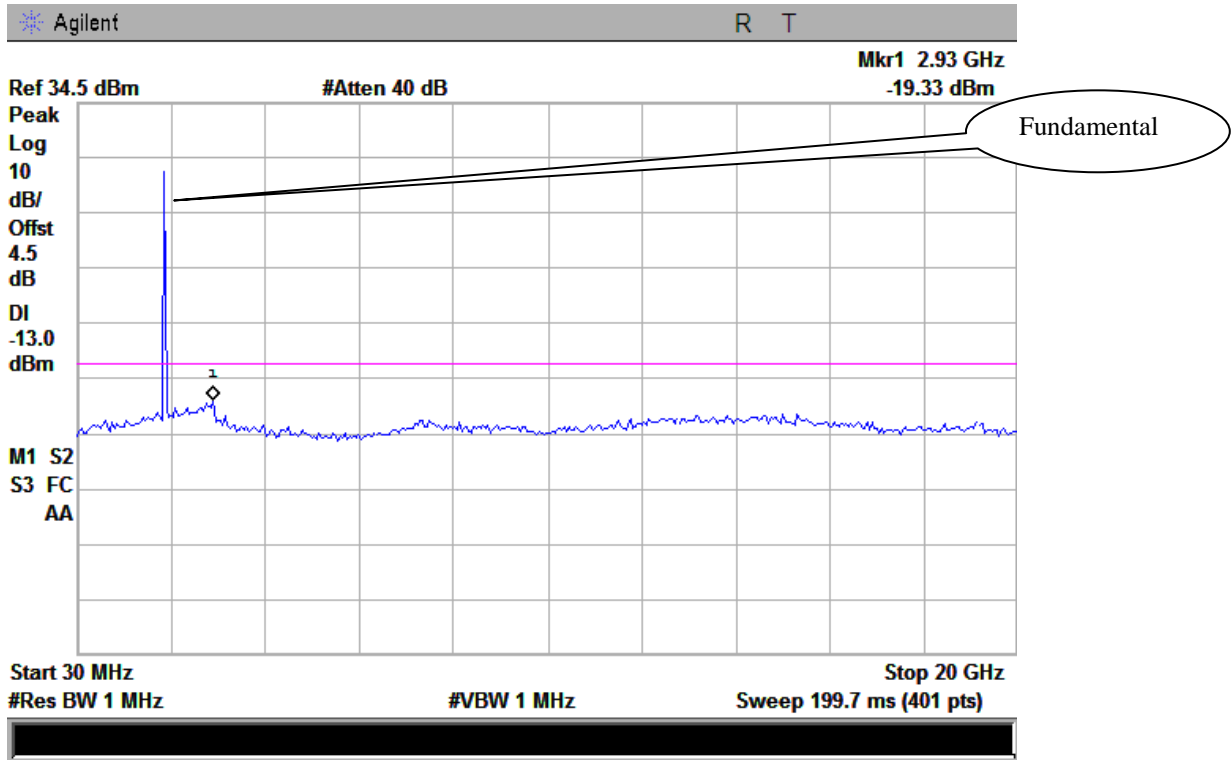
### UMTS-FDD Band II (Part24E)

30MHz-25G – WCDMA1900

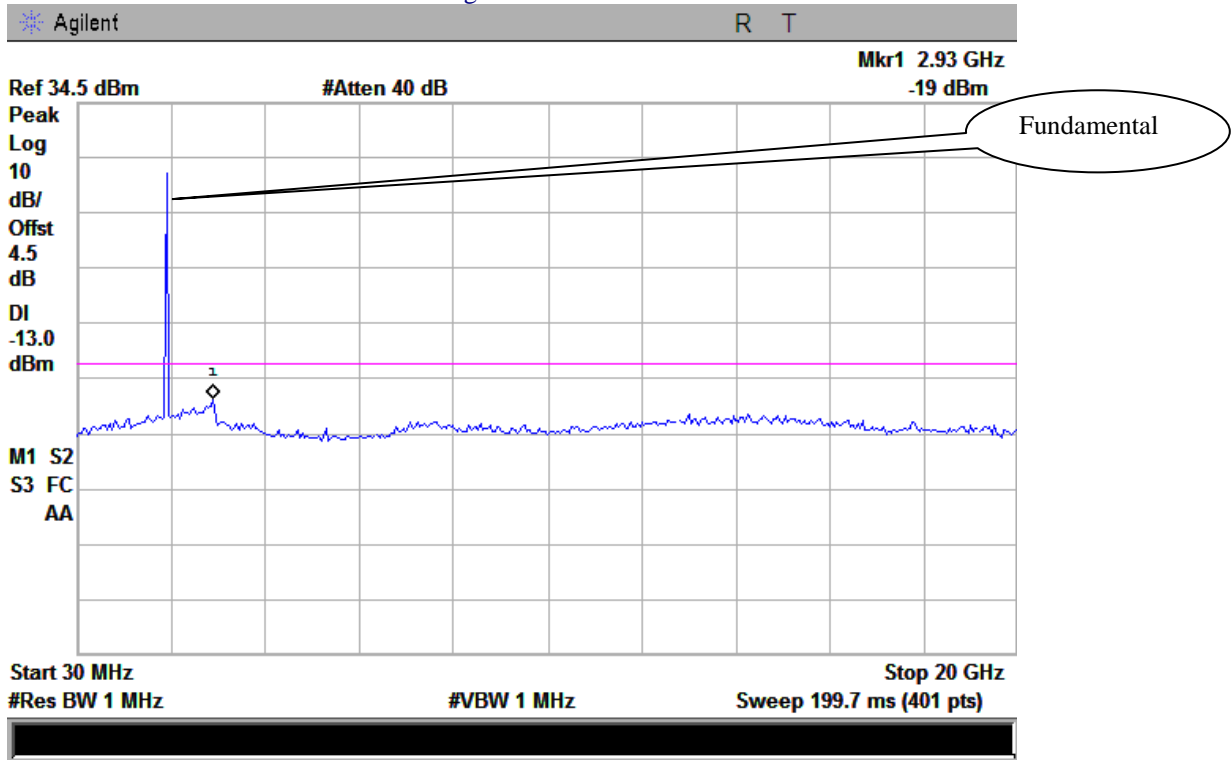
### Low Channel



### Middle Channel



### High Channel



## **5.6 §2.1053, §22.917 & §24.238 - Spurious Radiated Emissions**

1. All possible modes of operation were investigated. Only the 6 worst case emissions measured, using the correct CISPR detectors, are reported. All other emissions were relatively insignificant.
2. A "-ve" margin indicates a PASS as it refers to the margin present below the limit line at the particular frequency.
3. Radiated Emissions Measurement Uncertainty  
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 1GHz – 40GH is  $\pm 6.0\text{dB}$  (for EUTs < 0.5m X 0.5m X 0.5m).
4. Environmental Conditions
 

Temperature	26°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
5. Test date : July 02, 2013  
Tested By : Back Huang

### **Standard Requirement:**

The power of any emission outside of the authorized operating frequency ranges must be attenuated below the transmitter power (P) by a factor of at least  $43 + 10 \log (P)$  dB. The spectrum is scanned from 30 MHz up to a frequency including its 10<sup>th</sup> harmonic.

### **Procedures:**

Equipment was setup in a semi-anechoic chamber. For measurements above 1 GHz an average measurement was taken with a 10Hz video bandwidth. The EUT was tested at low, mid and high with the highest output power. An emission was scan up to 10<sup>th</sup> harmonic of the operating frequency.

Sample Calculation:

EUT Field Strength = Raw Amplitude (dB $\mu$ V/m) – Amplifier Gain (dB) + Antenna Factor (dB) + Cable Loss (dB) + Filter Attenuation (dB, if used)

### **Test Result: Pass**

*Note: The following test data please refer to report 13070137-FCC-R1.*

## Cellular Band (Part 22H)

### Low channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1648.4	-47.43	243	100	V	7.95	0.78	0	-40.26	-13	-27.26
1648.4	-44.27	178	120	H	7.95	0.78	0	-37.1	-13	-24.1
245.3	-53.87	302	120	V	6.7	0.32	0	-47.49	-13	-34.49
251.6	-51.41	305	110	H	6.8	0.32	0	-44.93	-13	-31.93

### Middle channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1673.2	-47.54	245	120	V	7.95	0.78	0	-40.37	-13	-27.37
1673.2	-44.18	185	110	H	7.95	0.78	0	-37.01	-13	-24.01
247.2	-53.52	108	110	V	6.7	0.32	0	-47.14	-13	-34.14
251.8	-52.15	310	110	H	6.8	0.32	0	-45.67	-13	-32.67

### High channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1697.6	-48.13	248	110	V	7.95	0.78	0	-40.96	-13	-27.96
1697.6	-44.42	72	120	H	7.95	0.78	0	-37.25	-13	-24.25
250.2	-53.18	112	110	V	6.8	0.32	0	-46.7	-13	-33.7
250.6	-52.46	306	110	H	6.8	0.32	0	-45.98	-13	-32.98



## PCS Band (Part 24E)

### Low channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3700.4	-50.83	108	120	V	10.25	2.73	0	-43.31	-13	-30.31
3700.4	-47.67	234	110	H	10.25	2.73	0	-40.15	-13	-27.15
245.6	-53.18	108	110	V	6.7	0.32	0	-46.8	-13	-33.8
251.2	-52.94	302	110	H	6.8	0.32	0	-46.46	-13	-33.46

### Middle channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3760	-51.17	113	110	V	10.25	2.73	0	-43.65	-13	-30.65
3760	-48.03	139	110	H	10.25	2.73	0	-40.51	-13	-27.51
245.6	-52.87	106	110	V	6.7	0.32	0	-46.49	-13	-33.49
251.4	-52.75	310	100	H	6.8	0.32	0	-46.27	-13	-33.27

### High channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3819.6	-51.31	108	110	V	10.36	2.73	0	-43.68	-13	-30.68
3819.6	-48.28	149	110	H	10.36	2.73	0	-40.65	-13	-27.65
245.5	-52.96	109	110	V	6.7	0.32	0	-46.58	-13	-33.58
250.8	-52.83	314	120	H	6.8	0.32	0	-46.35	-13	-33.35

## UMTS-FDD Band V (Part 22H)

### Low channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1652.8	-52.65	225	110	V	7.95	0.78	0	-45.48	-13	-32.48
1652.8	-48.21	155	120	H	7.95	0.78	0	-41.04	-13	-28.04
246.5	-52.32	149	110	V	6.7	0.32	0	-45.94	-13	-32.94
252.1	-51.95	233	110	H	6.8	0.32	0	-45.47	-13	-32.47

### Middle channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1670	-52.33	146	120	V	7.95	0.78	0	-45.16	-13	-32.16
1670	-48.25	188	130	H	7.95	0.78	0	-41.08	-13	-28.08
246.4	-53.87	285	120	V	6.7	0.32	0	-47.49	-13	-34.49
251.8	-52.31	213	110	H	6.8	0.32	0	-45.83	-13	-32.83

### High channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
1693.2	-52.25	221	110	V	7.95	0.78	0	-45.08	-13	-32.08
1693.2	-48.39	329	120	H	7.95	0.78	0	-41.22	-13	-28.22
247.1	-53.11	149	110	V	6.8	0.32	0	-46.63	-13	-33.63
252.4	-52.17	231	120	H	6.8	0.32	0	-45.69	-13	-32.69

## UMTS-FDD Band II (Part 24E)

### Low channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3704.8	-52.24	56	130	V	10.25	2.73	0	-44.72	-13	-31.72
3704.8	-49.74	119	120	H	10.25	2.73	0	-42.22	-13	-29.22
245.3	-53.04	199	110	V	6.7	0.32	0	-46.66	-13	-33.66
251.5	-52.88	266	110	H	6.8	0.32	0	-46.4	-13	-33.4

### Middle channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3760	-52.41	322	120	V	10.25	2.73	0	-44.89	-13	-31.89
3760	-49.82	255	110	H	10.25	2.73	0	-42.3	-13	-29.3
245.6	-52.98	145	110	V	6.7	0.32	0	-46.6	-13	-33.6
251.2	-53.06	211	110	H	6.8	0.32	0	-46.58	-13	-33.58

### High channel

Frequency (MHz)	Substituted level (dBm)	Direction (degree)	Height (cm)	Polarity (H/V)	Antenna Gain Correction (dB)	Cable Loss (dB)	Amplifier (dB)	Corrected Reading (dBm)	Limit (dBm)	Margin (dB)
3815.2	-52.35	335	100	V	10.36	2.73	0	-44.72	-13	-31.72
3815.2	-49.68	264	120	H	10.36	2.73	0	-42.05	-13	-29.05
245.3	-53.11	131	110	V	6.7	0.32	0	-46.73	-13	-33.73
251.6	-52.95	217	120	H	6.8	0.32	0	-46.47	-13	-33.47

## **5.7 §22.917(a) & §24.238(a) - Band Edge**

1. Conducted Measurement  
EUT was set for low, mid, high channel with modulated mode and highest RF output power.  
The spectrum analyzer was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty  
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is  $\pm 1.5$ dB.
3. Environmental Conditions  

Temperature	25°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
4. Test date : June 27, 2013  
Tested By : Back Huang

### **Standard Requirement:**

The power of any emission outside of the authorized operating frequency ranges must be lower than the transmitter power (P) by a factor of at least  $43 + 10 \log (P)$  dB.

### **Procedures:**

1. The EUT was connected to Spectrum Analyzer and Base Station via power divider.
2. The Band Edges of low and high channels for the highest RF powers were measured. Setting RBW as roughly BW/100.

### **Test Result: Pass**

*Note: The following test data please refer to report 13070137-FCC-R1.*

Refer to the attached plots.

**Cellular Band (Part 22H)**

Frequency (MHz)	Emission (dBm)	Limit (dBm)
823.9875	-14.90	-13
849.0125	-13.51	-13

**PCS Band (Part 24E)**

Frequency (MHz)	Emission (dBm)	Limit (dBm)
1849.9800	-15.97	-13
1910.0175	-16.38	-13

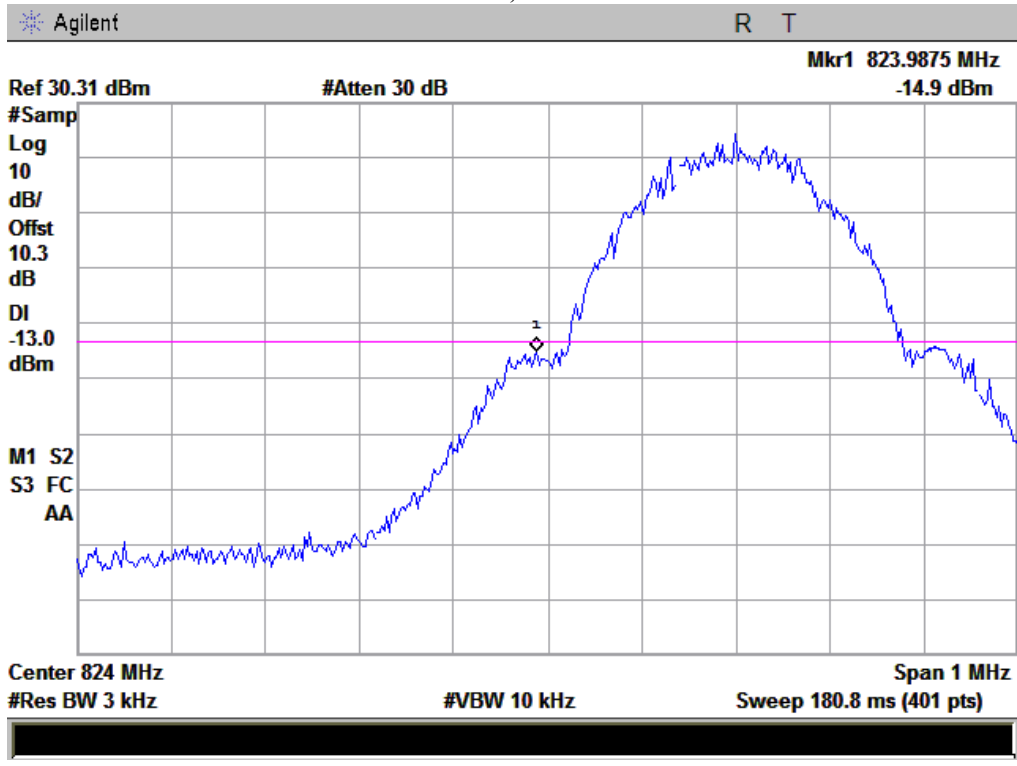
**UMTS-FDD Band V (Part 22H)**

Frequency (MHz)	Emission (dBm)	Limit (dBm)
824.000	-13.20	-13
849.000	-16.62	-13

**UMTS-FDD Band II (Part 24E)**

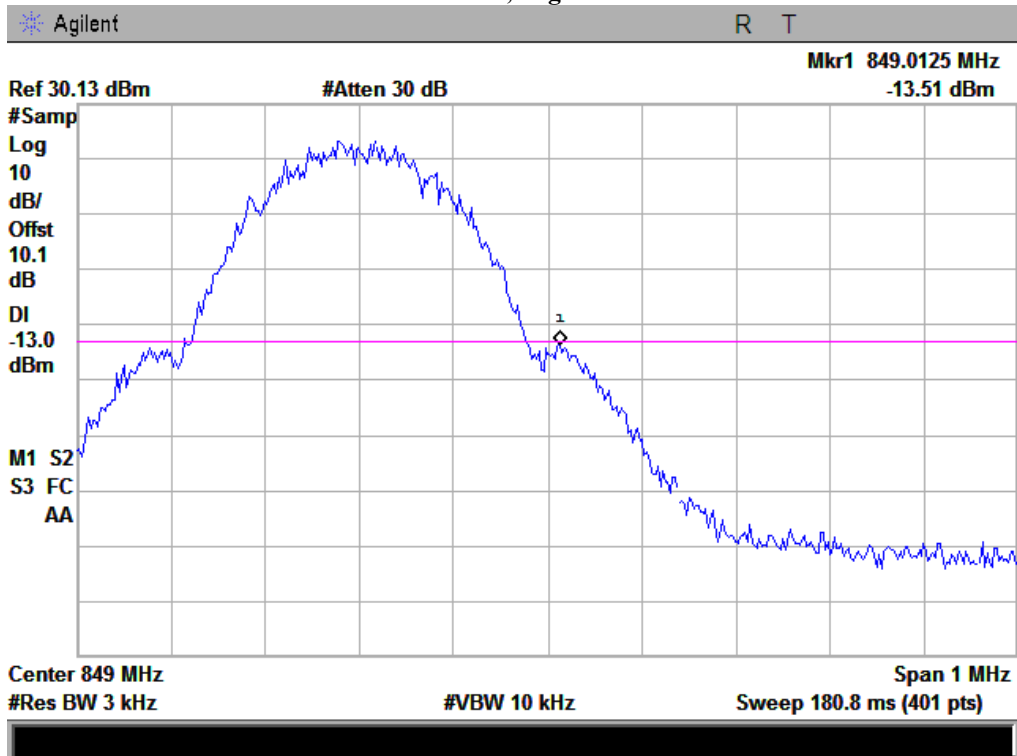
Frequency (MHz)	Emission (dBm)	Limit (dBm)
1850.000	-13.72	-13
1910.000	-15.69	-13

### Cellular Band, Low Channel



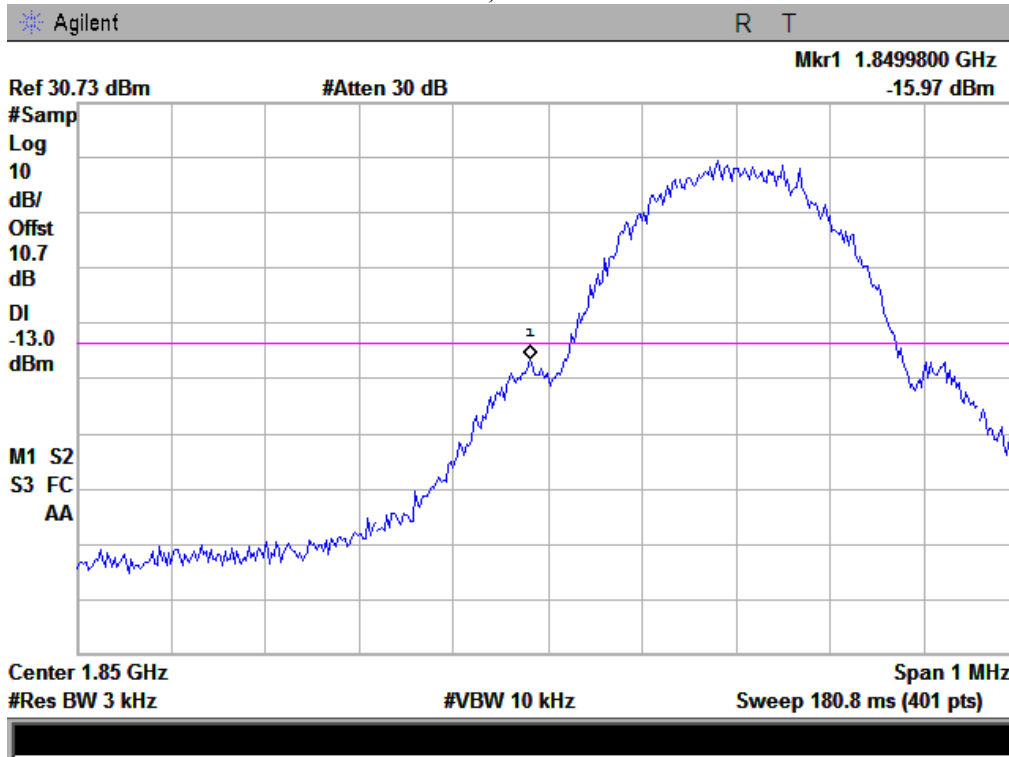
Note: Offset=Cable loss (4.0)+ Attenuation Factor(6.0) + 10log (3.14/3)=4.0+6.0+0.3=10.3 dB

### Cellular Band, High Channel



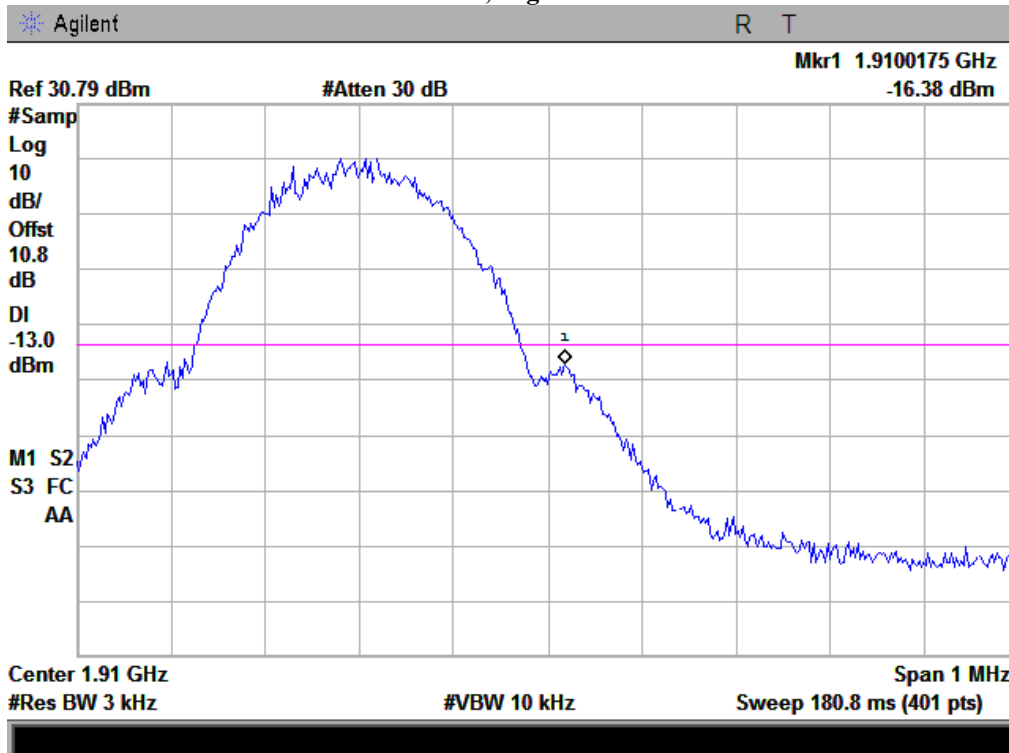
Note: Offset=Cable loss (4.0)+ Attenuation Factor(6.0) + 10log (3.09/3)=4.0+6.0+0.1=10.1 dB

### PCS Band, Low Channel



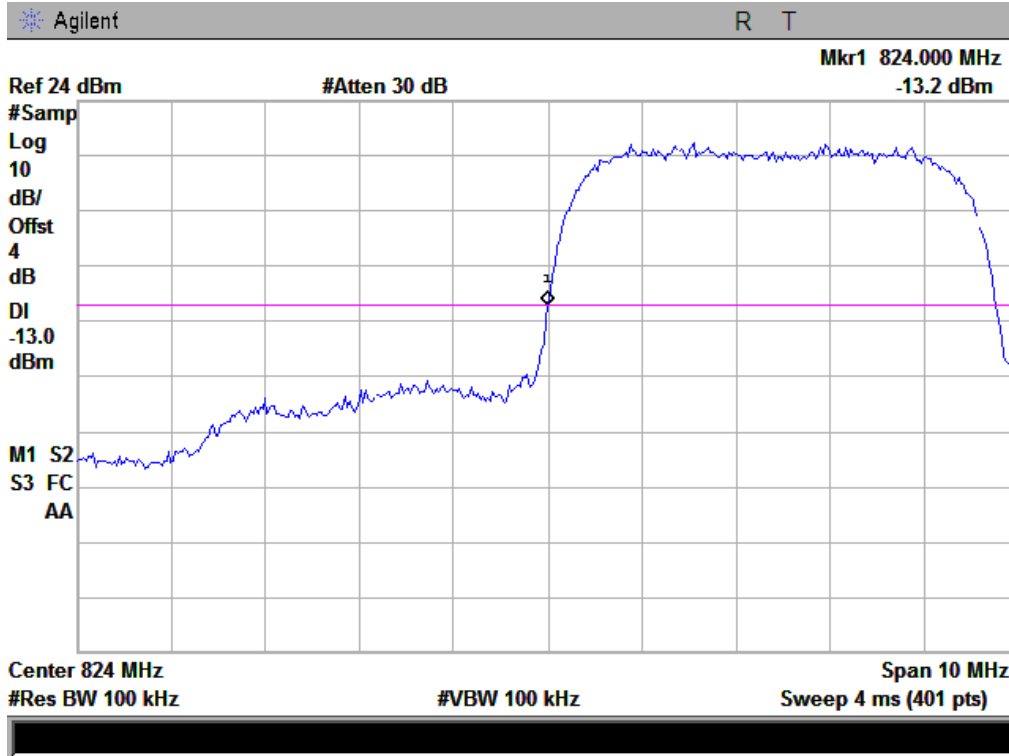
Note: Offset=Cable loss (4.5)+ Attenuation Factor(6.0) + 10log (3.16/3)=4.5+6.0+0.2=10.7 dB

### PCS Band, High Channel

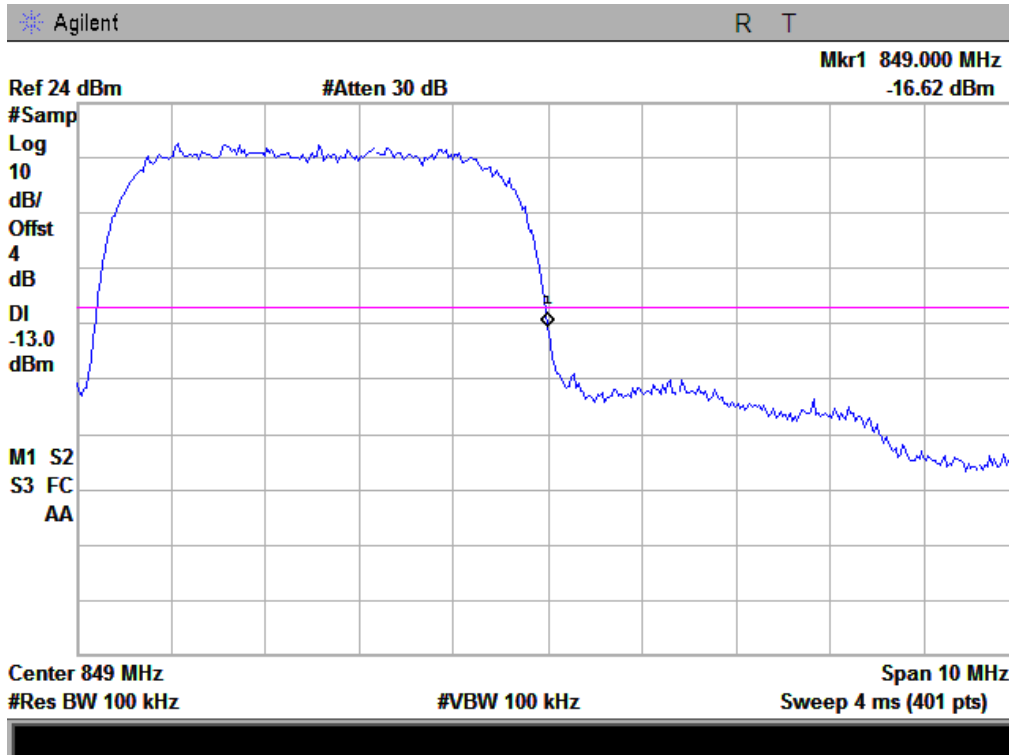


Note: Offset=Cable loss (4.5)+ Attenuation Factor(6.0) + 10log (3.21/3)=4.5+6.0+0.3=10.8 dB

### UMTS-FDD Band V, Low Channel

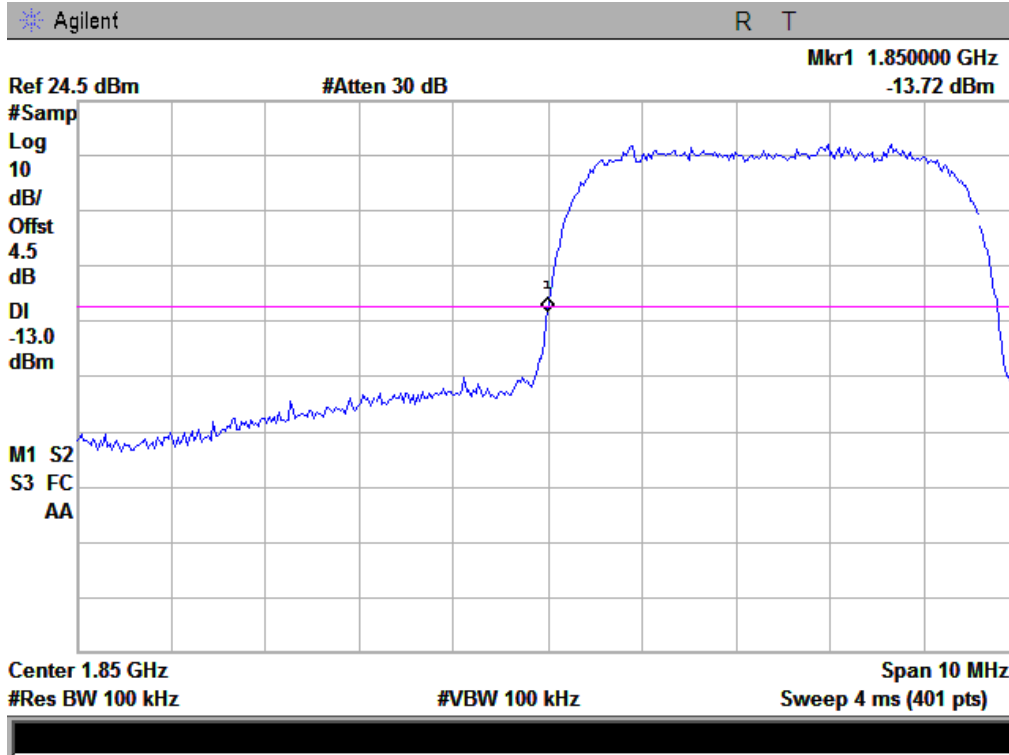


### UMTS-FDD Band V, High Channel

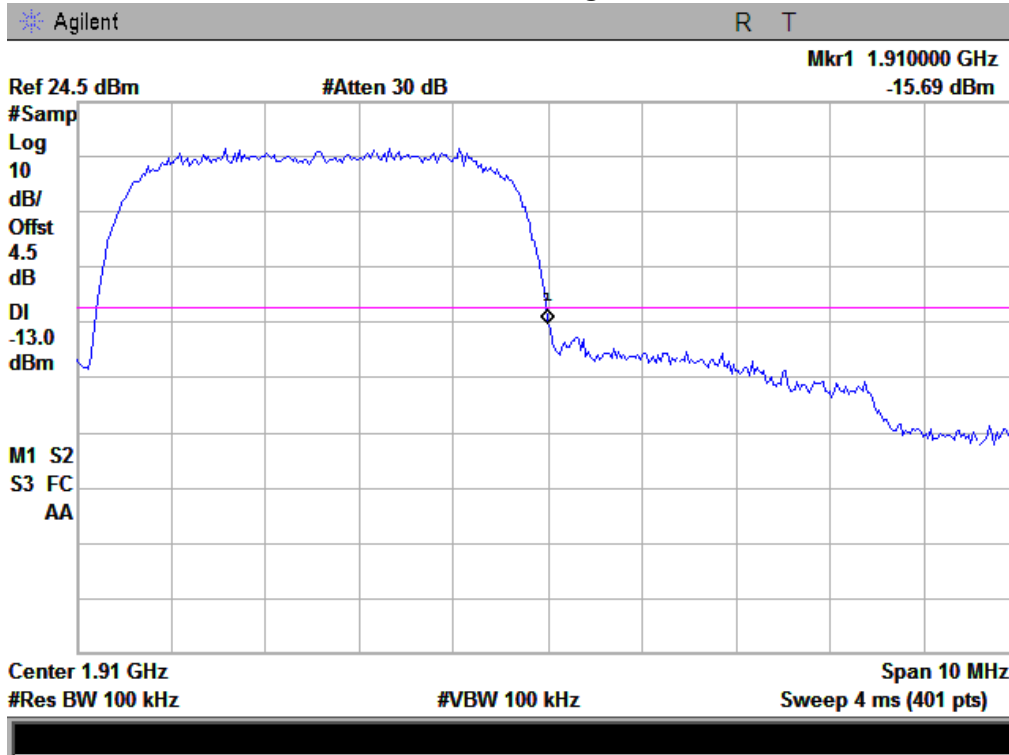




### UMTS-FDD Band II, Low Channel



### UMTS-FDD Band II, High Channel



## **5.8 §2.1055, §22.355 & §24.235 - Frequency Stability**

- |    |                                                     |                      |          |
|----|-----------------------------------------------------|----------------------|----------|
| 1. | Environmental Conditions                            | Temperature          | 25°C     |
|    |                                                     | Relative Humidity    | 50%      |
|    |                                                     | Atmospheric Pressure | 1019mbar |
| 2. | Test date : July 01, 2013<br>Tested By : Back Huang |                      |          |

### **Standard Requirement:**

According to §22.355, the carrier frequency of each transmitter in the Public Mobile Services must be maintained within the tolerances given in Table below:

Frequency Tolerance for Transmitters in the Public Mobile Services

Frequency Range (MHz)	Base, fixed (ppm)	Mobile ≤ 3 watts (ppm)	Mobile ≤ 3 watts (ppm)
25 to 50	20.0	20.0	50.0
50 to 450	5.0	5.0	50.0
450 to 512	2.5	5.0	5.0
821 to 896	1.5	2.5	2.5
928 to 929.	5.0	N/A	N/A
929 to 960.	1.5	N/A	N/A
2110 to 2220	10.0	N/A	N/A

According to §24.235, the frequency stability shall be sufficient to ensure that the fundamental emissions stay within the authorized frequency block.

### **Procedures:**

A communication link was established between EUT and base station. The frequency error was monitored and measured by base station under variation of ambient temperature and variation of primary supply voltage.

Limit: The frequency stability of the transmitter shall be maintained within  $\pm 0.00025\%$  ( $\pm 2.5\text{ppm}$ ) of the center frequency.

### **Test Results: Pass**

*Note: The following test data please refer to report 13070137-FCC-R1.*

**Frequency Stability versus Temperature:** The Frequency tolerance of the carrier signal shall be maintained within 2.5ppm of the operating frequency over a temperature variation of -10°C to +55°C at normal supply voltage.

**Cellular Band (Part 22H)**

Middle Channel, $f_0 = 836.6$ MHz				
Temperature (°C)	Power Supplied (V <sub>DC</sub> )	Frequency Error (Hz)	Frequency Error (ppm)	Limit (ppm)
-10	3.7	15	0.0179	2.5
0		19	0.0227	2.5
10		21	0.0251	2.5
20		23	0.0275	2.5
30		24	0.0287	2.5
40		20	0.0239	2.5
50		28	0.0334	2.5
55		33	0.0394	2.5
25	4.2	21	0.0251	2.5
	3.5	24	0.0287	2.5

**PCS Band (Part 24E)**

Middle Channel, $f_0 = 1880$ MHz				
Temperature (°C)	Power Supplied (V <sub>DC</sub> )	Frequency Error (Hz)	Frequency Error (ppm)	Limit (ppm)
-10	3.7	16	0.0085	2.5
0		21	0.0111	2.5
10		30	0.0160	2.5
20		27	0.0144	2.5
30		35	0.0186	2.5
40		32	0.0170	2.5
50		19	0.0101	2.5
55		15	0.0080	2.5
25	4.2	22	0.0117	2.5
	3.5	26	0.0138	2.5

**UMTS-FDD Band V (Part 22H)**

Middle Channel, $f_0 = 835$ MHz				
Temperature (°C)	Power Supplied (V <sub>DC</sub> )	Frequency Error (Hz)	Frequency Error (ppm)	Limit (ppm)
-10	3.7	8	0.0096	2.5
0		12	0.0144	2.5
10		11	0.0132	2.5
20		10	0.0120	2.5
30		13	0.0156	2.5
40		22	0.0263	2.5
50		17	0.0204	2.5
55		18	0.0216	2.5
25	4.2	19	0.0228	2.5
	3.5	16	0.0192	2.5

**UMTS-FDD Band II (Part 24E)**

Middle Channel, $f_0 = 1880$ MHz				
Temperature (°C)	Power Supplied (V <sub>DC</sub> )	Frequency Error (Hz)	Frequency Error (ppm)	Limit (ppm)
-10	3.7	6	0.0032	2.5
0		-2	-0.0011	2.5
10		8	0.0043	2.5
20		-5	-0.0027	2.5
30		10	0.0053	2.5
40		9	0.0048	2.5
50		6	0.0032	2.5
55		11	0.0059	2.5
25	4.2	8	0.0043	2.5
	3.5	-3	-0.0016	2.5

**Annex A. TEST INSTRUMENT & METHOD**

**Annex A.i. TEST INSTRUMENTATION & GENERAL PROCEDURES**

Instrument	Model	Serial #	Calibration Date	Calibration Due Date
<b>RF conducted test</b>				
Agilent ESA-E SERIES SPECTRUM ANALYZER	E4407B	MY45108319	09/17/2013	09/16/2014
Power Splitter	1#	1#	09/02/2013	09/01/2014
Universal Radio Communication Tester	CMU200	121393	09/17/2013	09/16/2014
Temperature/Humidity Chamber	UHL-270	001	10/22/2013	10/21/2014
DC Power Supply	E3640A	MY40004013	09/17/2013	09/16/2014
<b>Radiated Emissions</b>				
EMI test receiver	ESL6	100262	11/23/2013	11/22/2014
OPT 010 AMPLIFIER (0.1-1300MHz)	8447E	2727A02430	09/02/2013	09/01/2014
Microwave Preamplifier (0.5~18GHz)	PAM-118	443008	09/02/2013	09/01/2014
Bilog Antenna (30MHz~6GHz)	JB6	A110712	09/23/2013	09/22/2014
Bilog Antenna (30MHz~2GHz)	JB1	A112017	09/23/2013	09/22/2014
Double Ridge Horn Antenna (1 ~18GHz)	AH-118	71259	11/20/2013	11/19/2014
Double Ridge Horn Antenna (1 ~18GHz)	AH-118	71283	11/20/2013	11/19/2014
SYNTHESIZED SIGNAL GENERATOR	8665B	3744A01293	09/17/2013	09/16/2014
Tunable Notch Filter	3NF-800/1000-S	AA4	09/02/2013	09/01/2014
Tunable Notch Filter	3NF-1000/2000-S	AM 4	09/02/2013	09/01/2014

**Annex A. ii. RADIATED EMISSIONS TEST DESCRIPTION**

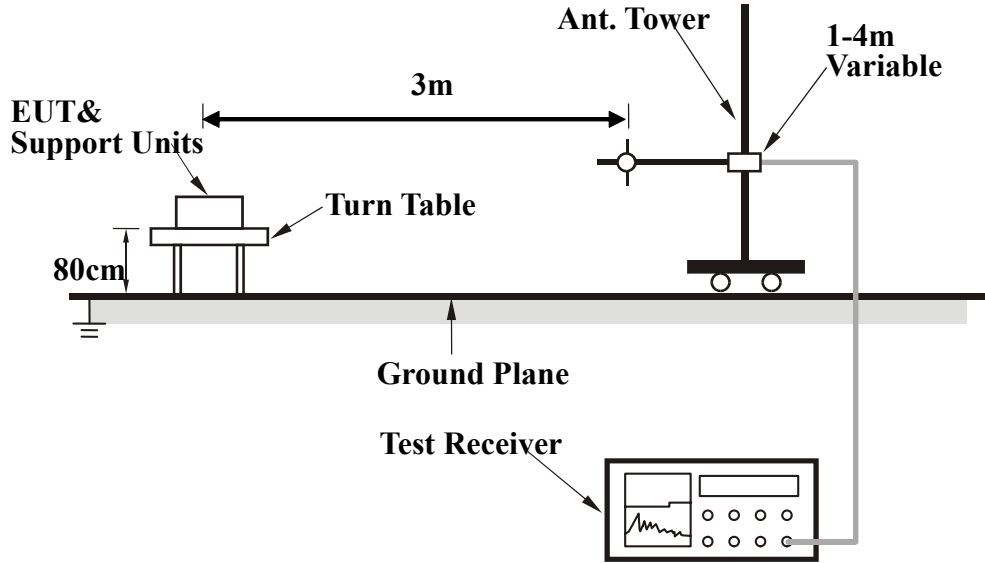
**EUT Characterisation**

EUT characterisation, over the frequency range from 30MHz to 1GHz (for FCC tests, until the 10<sup>th</sup> harmonic for operating frequencies  $\geq 108$ MHz), was done in order to minimise radiated emissions testing time while still maintaining high confidence in the test results.

The EUT was placed in the chamber, at a height of about 0.8m on a turntable. Its radiated emissions frequency profile was observed, using a spectrum analyzer/receiver with the appropriate broadband antenna placed 3m or 10m away from the EUT. Radiated emissions from the EUT were maximised by rotating the turntable manually, changing the antenna polarisation and manipulating the EUT cables while observing the frequency profile on the spectrum analyzer / receiver. Frequency points at which maximum emissions occurred, clock frequencies and operating frequencies were then noted for the formal radiated emissions test at the Open Area Test Site (OATS) or EMC 3m chamber.

**Test Set-up**

1. The EUT and supporting equipment were set up in accordance with the requirements of the standard on top of a 1.5m X 1.0m X 0.8m high, non-metallic table.
2. The filtered power supply for the EUT and supporting equipment were tapped from the appropriate power sockets located on the turntable.
3. The relevant broadband antenna was set at the required test distance away from the EUT and supporting equipment boundary.



**Test Method**

The following procedure was performed to determine the maximum emission axis of EUT:

1. With the receiving antenna is H polarization, rotate the EUT in turns with three orthogonal axes to determine the axis of maximum emission.
2. With the receiving antenna is V polarization, rotate the EUT in turns with three orthogonal axes to determine the axis of maximum emission.
3. Compare the results derived from above two steps. So, the axis of maximum emission from EUT was determined and the configuration was used to perform the final measurement.

**Final Radiated Emission Measurement**

1. Setup the configuration according to figure 1. Turn on EUT and make sure that it is in normal function.
2. For emission frequencies measured below 1 GHz, a pre-scan is performed in a shielded chamber to determine the accurate frequencies of higher emissions will be checked on a open test site or EMC 10m chamber. As the same purpose, for emission frequencies measured above 1 GHz, a pre-scan also be performed with a 1 meter measuring distance before final test.
3. For emission frequencies measured below and above 1 GHz, set the spectrum analyzer on a 100 kHz and 1 MHz resolution bandwidth respectively for each frequency measured in step 2.
4. The search antenna is to be raised and lowered over a range from 1 to 4 meters in horizontally polarized orientation. Position the highness when the highest value is indicated on spectrum analyzer, then change the orientation of EUT on test table over a range from 0 ° to 360 ° with a speed as slow as possible, and keep the azimuth that highest emission is indicated on the spectrum analyzer. Vary the antenna position again and record the highest value as a final reading.
5. Repeat step 4 until all frequencies need to be measured were complete.
6. Repeat step 5 with search antenna in vertical polarized orientations.

During the radiated emission test, the Spectrum Analyzer was set with the following configurations:

Frequency Band (MHz)	Function	Resolution bandwidth	Video Bandwidth
30 to 1000	Peak	100 kHz	100 kHz
Above 1000	Peak	1 MHz	1 MHz
	Average	1 MHz	10 Hz

**Description of Radiated Emission Program**

This EMC Measurement software run LabView automation software and offers a common user interface for electromagnetic interference (EMI) measurements. This software is a modern and powerful tool for controlling and monitoring EMI test receivers and EMC test systems. It guarantees reliable collection, evaluation, and documentation of measurement results. Basically, this program will run a pre-scan measurement before it proceeds with the final measurement. The pre-scan routine will run the scan on four different antenna heights, 2 antenna polarity, and 360 degrees table rotation. For example, the program was set to run 30 MHz to 1 GHz scan; the program will first start from a meter antenna height and divide the 30 MHz to 1 GHz into 10 separate parts of maximum hold sweeps. Each parts of maximum hold sweep, the program will collect the data from 0 degree to 360 degrees table rotation. After the program complete the 1m scan, the antenna continues to rise to 2m and continue the scan. The step will repeated for all specified antenna height and polarity. This program will perform the Quasi Peak measurement after the signal maximization process and pre-scan routine. The final measurement will be base on the pre-scan data reduction result.

**Sample Calculation Example**

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. For the limit is employed average value, therefore the peak value can be transferred to average value by subtracting the duty factor. The basic equation with a sample calculation is as follows:

$$\text{Peak} = \text{Reading} + \text{Corrected Factor}$$

where

$$\text{Corr. Factor} = \text{Antenna Factor} + \text{Cable Factor} - \text{Amplifier Gain (if any)}$$

And the average value is

$$\text{Average} = \text{Peak Value} + \text{Duty Factor or}$$

$$\text{Set RBW} = 1\text{MHz, VBW} = 10\text{Hz.}$$

Note:

If the measured frequencies are fall in the restricted frequency band, the limit employed must be quasi peak value when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function.



**Annex B. EUT AND TEST SETUP PHOTOGRAPHS**

**Annex B.i. Photograph 1: EUT External Photo**



Whole Package - Top View



Adapter - Top View





EUT - Front View



EUT - Rear View



EUT - Top View

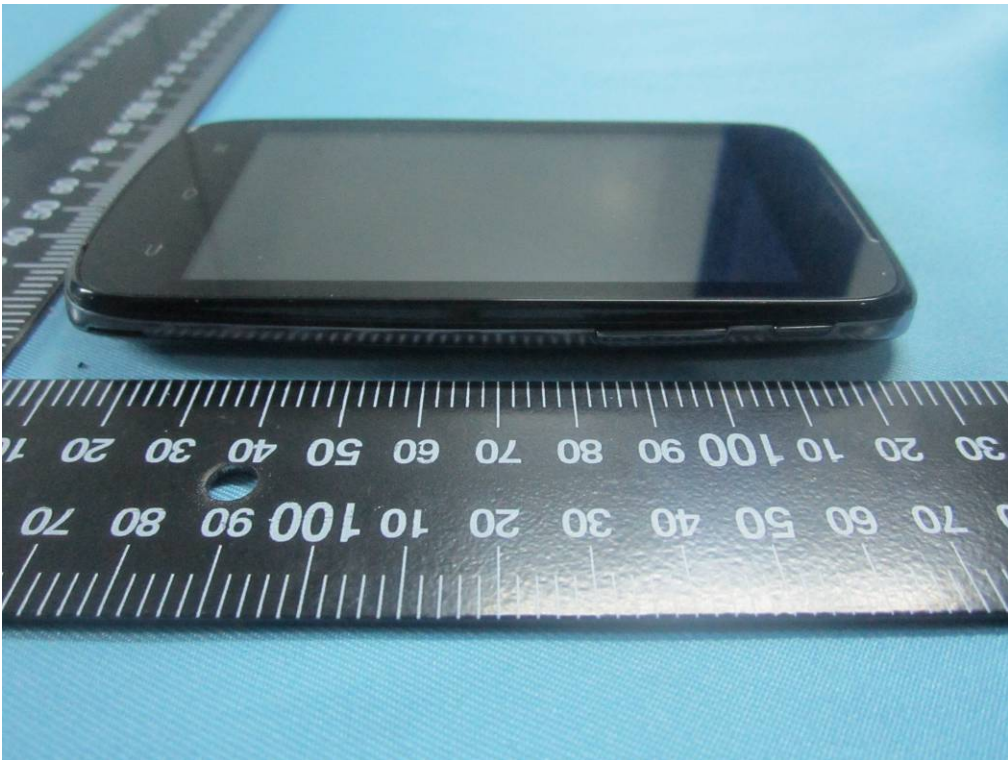


EUT - Bottom View





EUT - Left View



EUT - Right View

**Annex B.ii. Photograph 2: EUT Internal Photo**



Cover Off - Top View (type A one SIM card)



Cover Off - Top View (type B two SIM card)





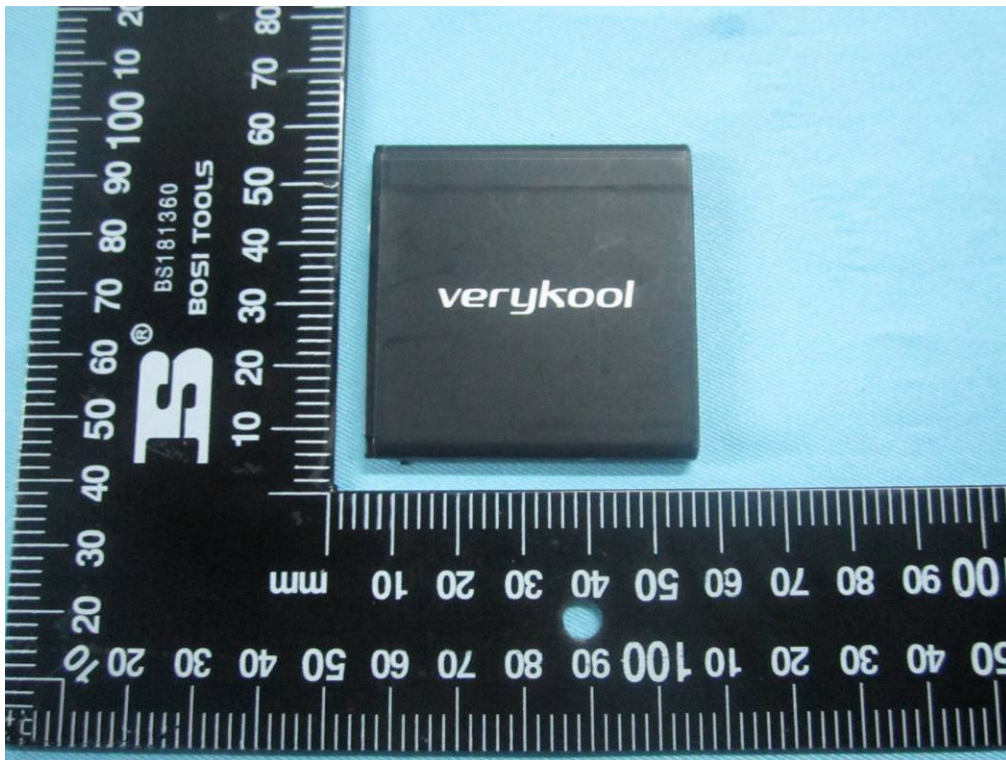
Cover Off - Front Housing View



Cover Off - Rear Housing View (type A one SIM card)

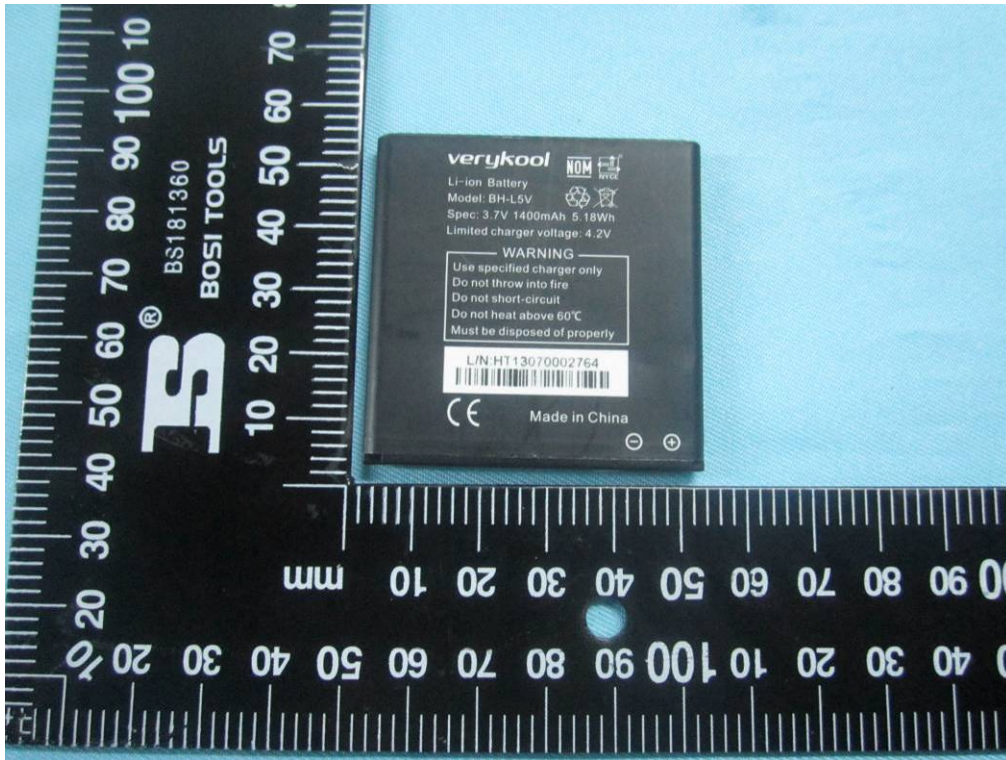


Cover Off - Rear Housing View (type B two SIM card)



Battery - Top View

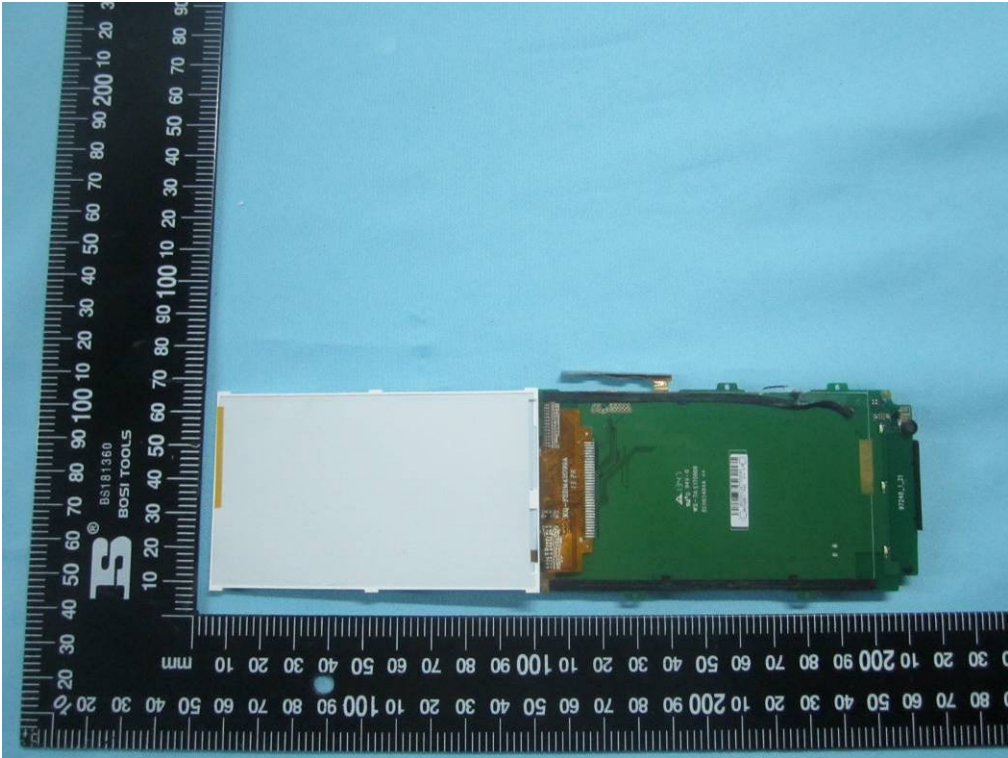




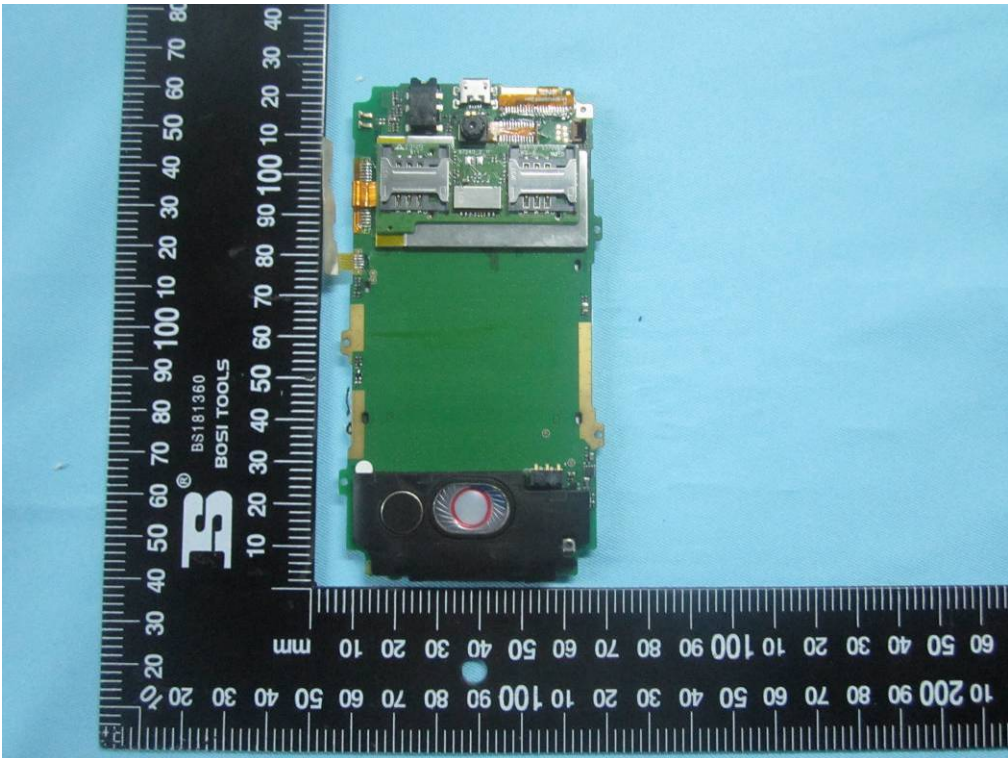
Battery - Bottom View



Mainboard - Top View

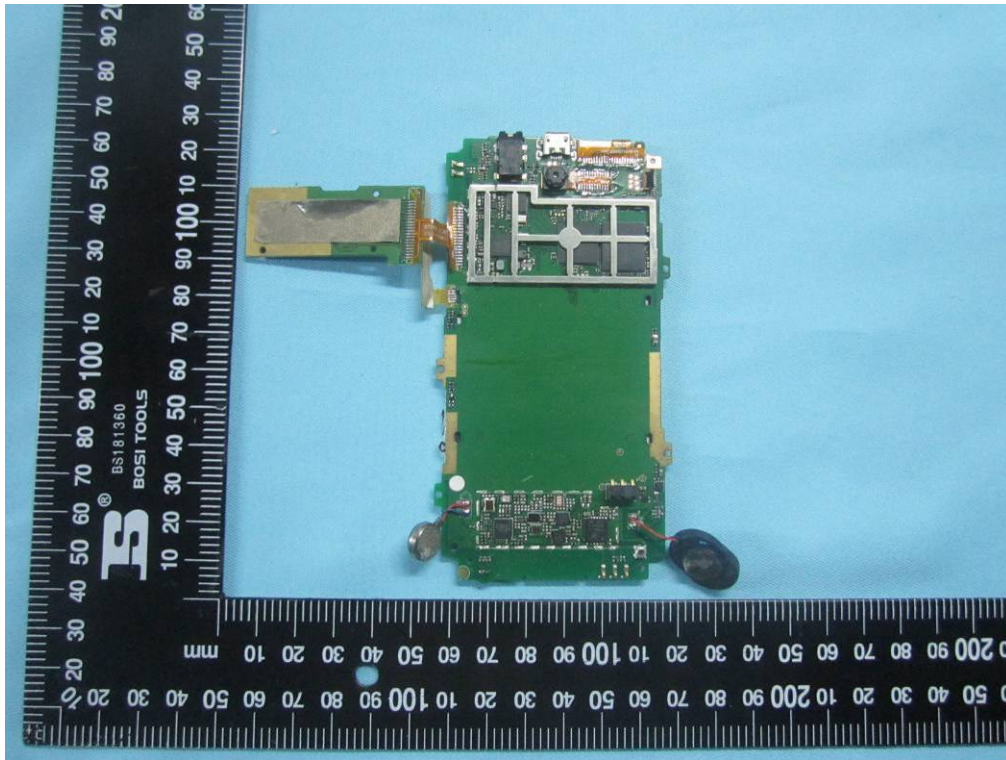


Mainborad Uncover - Top View



Mainborad - Bottom View

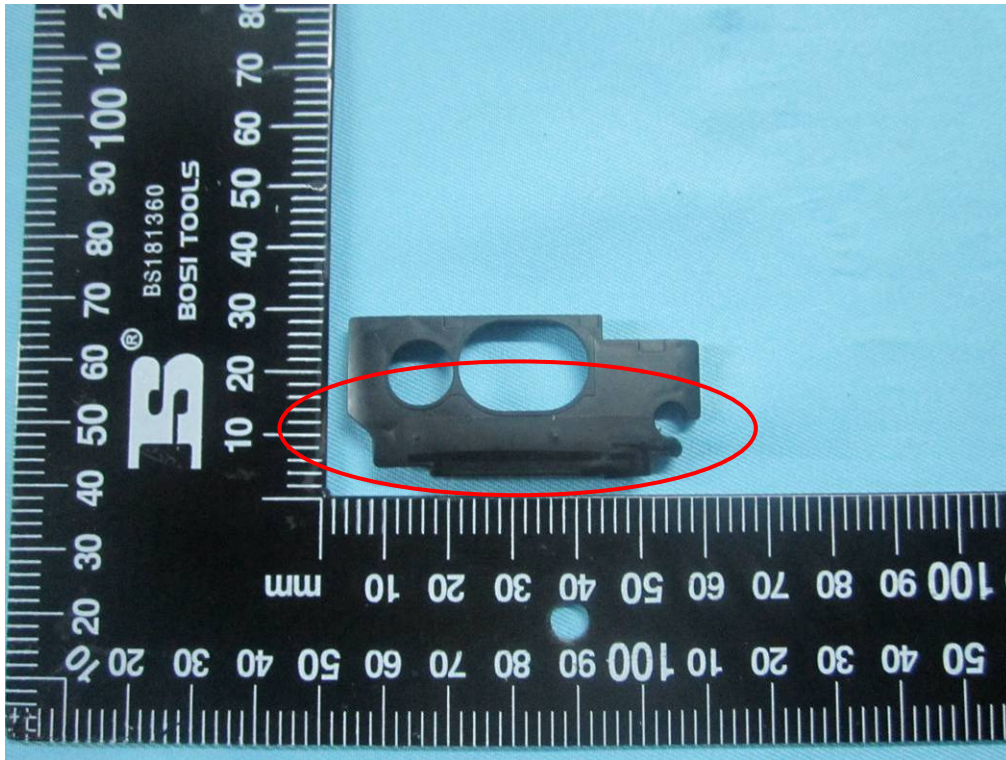




Mainboard Without Shielding - Bottom View



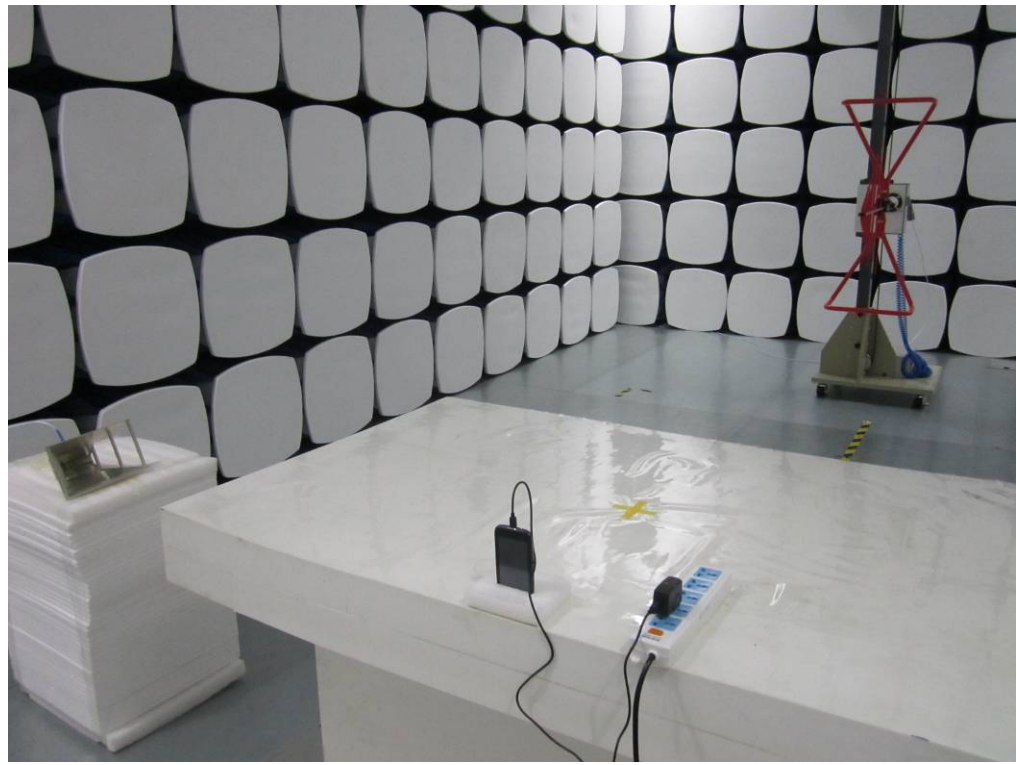
Bluetooth / BLE / WIFI Antenna View



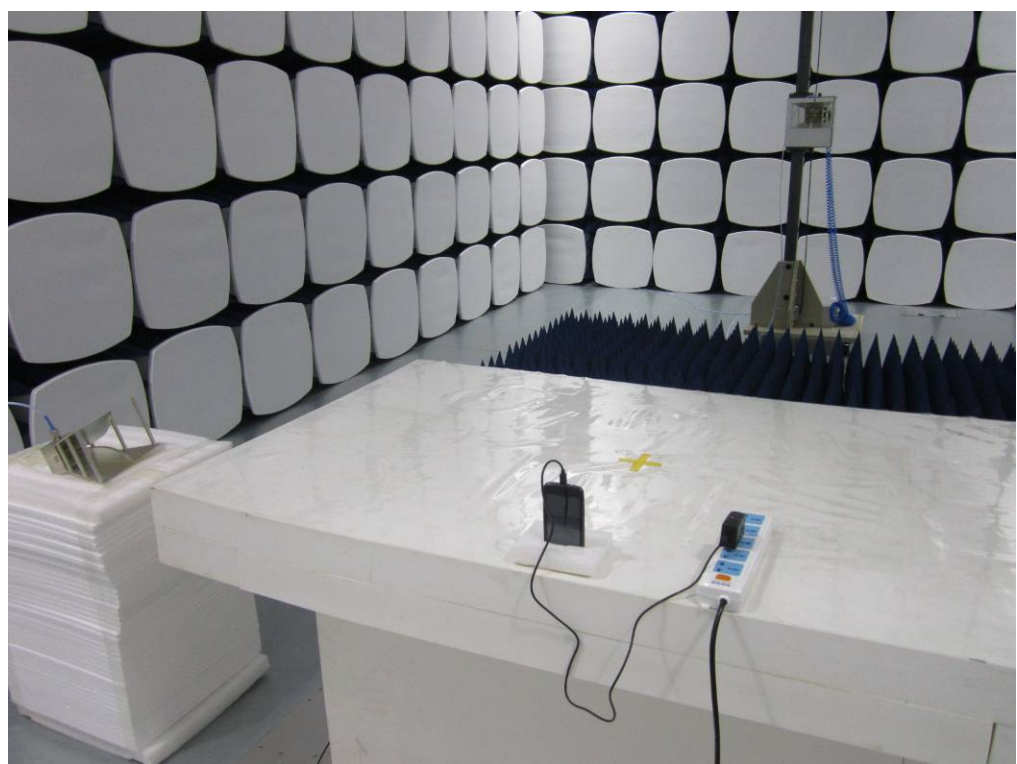
GSM / PCS/ UMTS Antenna View



**Annex B.iii. Photograph 3: Test Setup Photo**



Radiated Spurious Emissions Test Setup Below 1GHz - Front View



Radiated Spurious Emissions Test Setup Above 1GHz -Front View

**Annex C. TEST SETUP AND SUPPORTING EQUIPMENT**

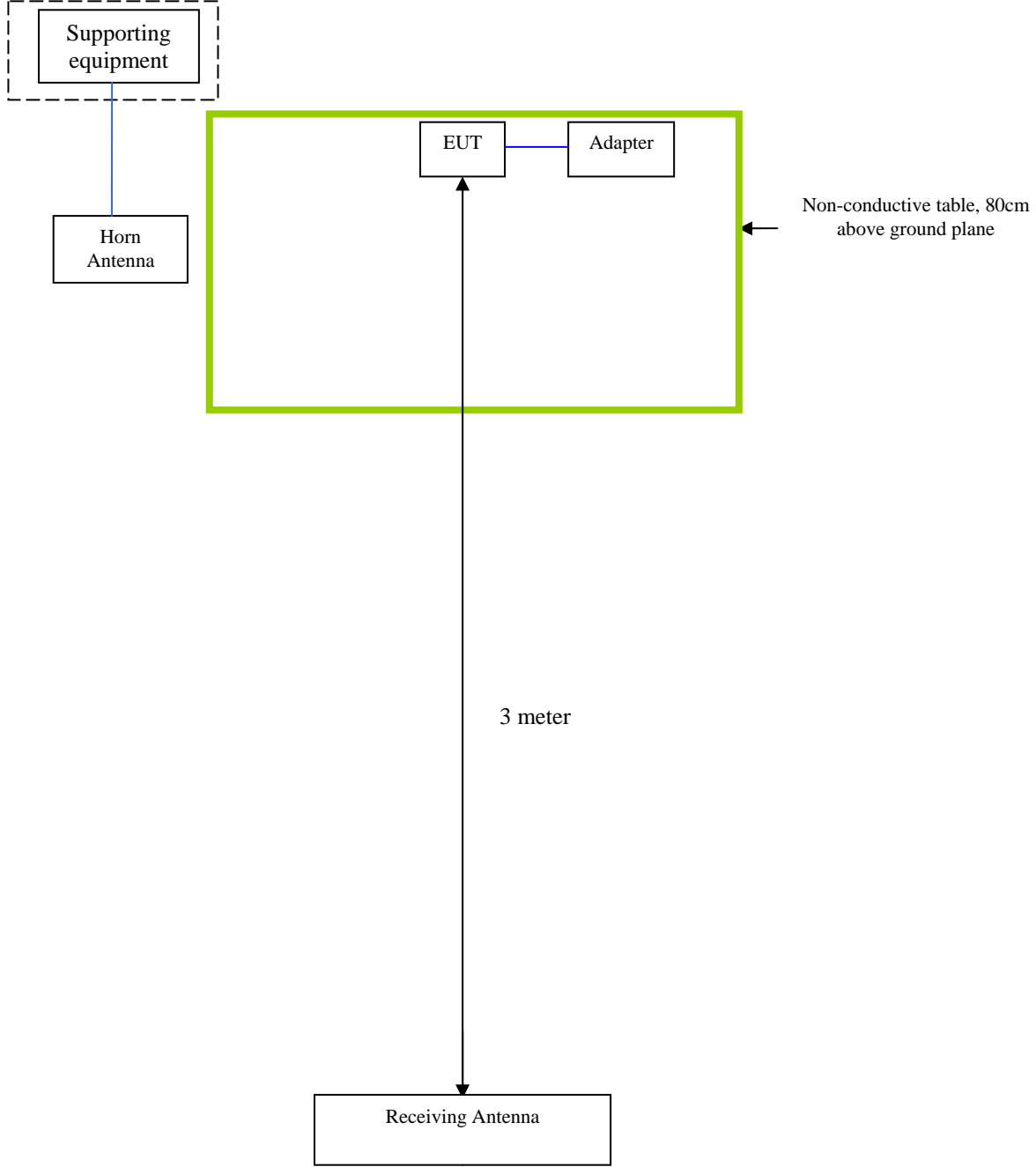
**EUT TEST CONDITIONS**

**Annex C. i. SUPPORTING EQUIPMENT DESCRIPTION**

The following is a description of supporting equipment and details of cables used with the EUT.

Manufacturer	Equipment Description (Including Brand Name)	Model	Calibration Date	Calibration Due Date
N/A	N/A	N/A	N/A	N/A

**Block Configuration Diagram for Radiated Emissions**



**Annex C.ii. EUT OPERATING CONDITIONS**

The following is the description of how the EUT is exercised during testing.

Test	Description Of Operation
<b>Emissions Testing</b>	The EUT was communicating with base station and set to work at maximum output power.
<b>Others Testing</b>	The EUT was communicating with base station and set to work at maximum output power.

**Annex D. USER MANUAL / BLOCK DIAGRAM / SCHEMATICS / PART LIST**

**Please see attachment**

**Annex E. DECLARATION OF SIMILARITY**



Verykool USA INC.  
3636 Nobel Drive, Suite 325, San Diego, CA 92122  
Tel: 001 858 373 1635  
Fax: 001 858 373 1505  
Date: 2014-03-04

**Declaration of Similarity**

To:  
SIEMIC (Shenzhen-China) Laboratories  
Zone A, Floor 1, Building 2, Wan Ye Long Technology Park, South Side of  
Zhoushi Road,  
Shiyan Street, Bao'an District, Shenzhen 518108, Guangdong, P.R.C.  
Tel: +(86) 0755-26014629, 26014953, 27629948, 27628616-808

We, Verykool USA INC. hereby declare that our product, Mobile Phone, Model: s400 and s400T, these two models are electrically and mechanically identical, share the same PCB Layout and components. And the difference between them is that s400T has no Band1 of 3G frequencies (removed related PA of WCDMA band 1, kept the other parts unchanged), s400T includes single card slot and dual card slot, share the same PCB Layout and components, no other differences except the quantity of card slots. Model:s400 was tested by SIEMIC, project No.is 13070137.

Sincerely

Signature:

SunnyChoi

Product Management Director