

Dear JC,

I have reviewed the original and C2PC filings and believe that there are no discrepancies in conducted output power. I also believe that the radiated powers (rated powers on the grants) for the 850MHz band remain unchanged and are now lower than the original powers for the 1900 MHz band.

The attached table compares the Radiated/Conducted powers from original and C2PC EMC reports, conducted powers from original and C2PC SAR reports and the tune up min/max powers. Based on this:

1. The C2PC grant needed to be corrected for a typo in the output power for 1900MHz CDMA (should be 1.5668 W, incorrectly entered as 1.5688 W). This has been done.
2. The difference in conducted output power measurements from the original and C2PC SAR reports is a maximum of 0.2dB. All measured powers are within the expected tune-up tolerances.
3. The difference in radiated power between original and C2PC reports is < +/- 0.5dB for the 850 band and between 4.6dB and 6.3dB lower in the 1900 MHz band.
4. The difference in conducted powers in the EMC reports is 0.2dB for GSM powers and no longer listed for the CDMA modes (CDMA testing was performed based on SAR powers being within expected tune up tolerances for the sample tested).

This should qualify for a C2PC because there is:

- No change to the conducted output power (all measured average conducted powers are within the original tune-up tolerance).
- Radiated (rated powers) do not exceed the original granted powers by more than might be expected from measurement uncertainty in the 850MHz band and are lower in the 1900 MHz band. The TCB did question the radiated power reduction and the response, included in the original e-filing upload, was that improved isotropy for the transmit antenna has led to a lower peak eirp.
- As the proposed changes would affect radiated performance, radiated spurious emissions, radiated fundamental power and SAR tests were all repeated. Repeating other tests would not seem to be warranted given the proposed changes.

In addition the EMC reports and SAR reports have been revised and uploaded to the filing. I have superseded the previous versions. SAR report corrections were made to address comments regarding calibration information. EMC reports were updated to correct the power summary tables. The output power for CDMA mode was removed from the GSM report as it did not belong in that report.

Regards,

Mark

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Band and Mode	Grant (Original Filing)		Grant (C2PC Filing)		Report (Original Filing)				Report (C2PC Filing)				Radiated Deltas (dB)	SAR Report Power			Tune-Up Procedure	
	ERP/EIRP (W)		ERP/EIRP (W)		ERP/EIRP		Conducted		ERP/EIRP		Conducted			Original dBm	C2PC dBm	Delta dB	Min dBm	Max dBm
	W	dBm	W	dBm	dBm	W	dBm	W	dBm	W	dBm	W						
850 GSM	1.9861	32.98	1.9861	32.98	32.98	1.986	33.40	2.188	33.12	2.051	33.20	2.089	0.14	33.20	33.00	0.20	31.00	33.20
850 WCDMA	0.4853	26.86	0.4853	26.86	26.86	0.485	26.70	0.468	26.97	0.498	See note		0.11	23.60	23.70	-0.10	21.50	23.70
1900 GSM	1.4689	31.67	1.4689	31.67	31.67	1.469	30.30	1.072	25.39	0.346	30.10	1.023	-6.28	30.10	30.10	0.00	28.00	30.20
1900 CDMA	1.5668	31.95	1.5668	31.95	31.95	1.567	26.32	0.429	27.35	0.543	See note		-4.60	23.20	23.10	0.10	21.00	23.20

Conducted powers not included in EMC report, only a general statement that they confirmed output power was within expected values. SAR testing on same sample shows powers were within tune-up procedure tolerances and very close to powers of original device.

Summary data in the original test report listed 29.8dBm for highest conducted power, but 30.30dBm was the highest measurement in the power data tables. This was corrected in revised report, uploaded to the original filing after requesting FCC place the original filing in audit mode.