

- 1 It appears that FCC ID ZSW-QS302-LQ310 will be shared by two smartphone devices, QS302 and LQ310. It is incorrect, as stated in the Declaration Letter (Annex E, EMC report), that if the two devices have the same hardware then only one needs to be presented. Component placement, layout, housing design, antenna design, antenna location, software operation modes and sometimes even battery and accessory can cause the two devices to have different EMC, HAC and/or SAR performance. A list of ALL differences between the two devices is required to justify test omission.

Response :

A declaration of detail different is attached. the component placement, housing, antenna design and location and software operating mode is identical. The software different is for animation and ringtone only.

2. The EUT supports dual SIM features. Please identify the highest transmit duty cycle when the two lines are both active (typically on a time-sharing basis, e.g., call hold, call waiting, call transfer, etc.; or concurrently such as call conference).

Response :

Dual SIM card operation mode declaration letter is attached. the phone does not support dual SIM active at the same time.

3. In addition to GPRS MSC 12, does the device support DTM features (MT6253 is DTM capable)? If so, what are the DTM classes allowed? Did the SAR evaluation consider DTM modes?

Response :

DTM Mode is not supported in this phone. (please see attached declaration letter)

4. The operational description mentions RDA5868+, a Bluetooth SOC, despite another part MT6612 is described as the Bluetooth chipset. Block diagram is missing the BT subsystem. Please clarify

Response:

Existing block diagram does indicate a BT block. Please help advice if this is not enough.
If not , please help clarify what additional information you are requesting.

5. An output power tolerance of 2 dB is too high given the margin of some SAR data; a 2 dB (58%) scale-up would exceed the 1.6 W/kg limit. Furthermore, the sample used in the SAR test is more than 2 dB below the maximum indicated in the EMC and tune-up procedure, with tolerance taken into account. Design should be changed (using components with less tolerance) and/or production specification should be tightened. The SAR evaluation, as is, is non-compliant. Please provide corrective action or counter-argument.

Response :

We had informed applicant of FCC concern of the big tune up power tolerant, Applicant will consider to narrow down the Tune up Power tolerant. Applicant and SAR test lab indicated that the Scale-up SAR was already considered in SAR report page 34 , it has been checked that it is still complied with 1.6W/kg SAR limit.

6. Note that for band edge emission compliance, the required resolution bandwidth of at least 1% of the emission bandwidth in 24.238(b) specifies the 26 dB bandwidth as the emission bandwidth. Therefore, the use of 3 kHz RBW is inadequate because it is less than 1% of 26 dB bandwidth. Finally, the confidential Operational Description is very similar to that for another FCC ID device made by another manufacturer who employs a different hardware platform, tested by a different test lab and granted by another TCB. Please identify the author of the operational description of this application. And if there is an explanation from the author for the similarity, please present the explanation. Due to the potential non-compliant nature of this device, your reply is expected before the end of 6/28/2012.

Response:

Band Edge measurement , a correction factor was taken into account for using 3KHz. Please help to see test plots with offset of 4dB , which is include of cable loss plus $10 \cdot \log(3.5/3)$ correction factor.
Ops description , Applicant indicated that he is referencing other product Ops Description. So the format may looks identical but the content is correct (see attached declaration letter). In addition, applicant has provided a revised Ops description which removed some of other non-related wording/information.