



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

November 2, 2005

RE: LG Electronics

FCC ID: BEJLSI120R

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) Please note that photographs (internal) show an AC adapter that is not an FCC version. If possible, please correct.
- 2) According to TCB policy issued last month TCBs are currently asked to seek FCC advise prior to issuing grant for EACH device utilizing what the FCC deems new technology. This device appears to utilize CDMA 2000 which to the FCC is considered as new technology. In effort to communicate with the FCC as quickly as possible and avoid delays, please provide confirm the details of what exact standard the CDMA radio is capable of using i.e. IS-95, IS-2000, etc.
- 3) Please note that for CDMA, the FCC has been asking for the following information (although this is subject to change as we further communications with them). If this device does contain CDMA 2000, Please provide information regarding the following:

Filings should be clear about transmitter setup & operation capabilities to ensure devices are configured properly according to communication protocol and operating requirements to obtain valid SAR and EMC results. Supporting info should include but may not be limited to:

- a) CDMA MS Protocol Revision number.
 - b) applicability of test codes to simulate the required test conditions, as defined in 3GPP2, TIA, and other standards.
 - c) Base station simulator and test device configuration info and procedures used to maximize output in all applicable modes, including code domain channels, power & relative gain levels.
 - d) Identify CDMA Radio Configurations, Service Options, multiplex options, voice/data, code channel combinations and options used for the SAR tests.
 - e) Because of the different RC's, SO's, data rates, channel combinations and modulations, filing should include justifications on the selection of applicable configurations to establish and maintain maximum output to demonstrate SAR compliance for other configurations that are not tested.
- 4) This device appears to be capable of USB connection to a PC and is therefore also considered a PC peripheral device (in addition to the TX requirements, i.e. Part 22, etc.) and is subject to either a Certification or DoC as a PC peripheral. Therefore the application must clarify if you are asking for:
- a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral
 - b) Certification as a TX + PC peripheral.

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. Note that there are additional review costs associated with this additional certification.

Note 2: To qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT) during this particular test. Information appears to be provided that supports this.

Note 4: Each path (DoC or Certification) has particular labeling requirements that must be followed. For DoC authorizations, the label should also include specific DoC labeling information and also the users manual should include information regarding Part 2.1077. If the device is Certified, the FCC ID and current labeling requirements for the TX will cover the labeling requirements. However, additional grants are generated and review costs are higher. Currently labeling and users manual do not support a DoC.

The manufacturer does have a choice of DoC or Certification, however the device labeling and manual information must match the appropriate methods used.

- 5) The users manual reports conflicting SAR results. Page 56 (labeled 55) and page 73 appear to contain different information than the test report.
- 6) FCC ID in users manual is incorrect on page 73. Please correct.
- 7) FCC asks that SAR report identify if the test device is production unit or identical prototype (47 CFR §2.908).
- 8) Further detail on how test signals for SAR are established should be provided. Please provide more detailed procedures to establish the test signals described (put phone on a call, e.g., base-station simulator vs internal test codes)? This may include a test equipment list or test codes.
- 9) Body worn photographs for SAR do not appear to show a headset attached. Accessories should be attached for SAR testing during body worn conditions.



Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.