

Correspondence Reference Number:	90874
Form 731 Confirmation Number:	TC729484
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1) SAR report mentions KDB 502978 (N.B. 502978 is a KDB inquiry, NOT a KDB publication) The cited KDB listed a specific FCC ID different from instant A3LSHWM180S; therefore it appears the cited KDB is not directly applicable for instant A3LSHWM180S. This device A3LSHWM180S appears to differ from that discussed at cited "FCC meeting on 06/04/10", e.g. this includes camera on back face, whereas those discussions disclosed only other configurations. The cited KDB stated that in case of different form factor, device configurations, camera location, voice and data modes availability, then subsequent separate considerations through additional or different KDBs were required. In addition, A3LSHWM180S has different 3GPP capabilities compared to those for which KDB inquiry 502978 considerations were applicable. Furthermore, we note Form-731 does not list that KDB number nor any other pre-TCB nor TCB PBA KDB inquiry for this application which uses non-standard test procedures, therefore it is unclear whether and how TCB processing of this application is in conformity with 47 CFR 2.962 requirements. Please respond within this info request to address this and the following items no later than 9/30/10 12 pm US eastern time, or this application may be subject to 2.917 and/or other administrative action.

The above-referenced FCC ID is part of a family of mini-tablets, all with the same identical form factor and video conferencing camera location. Each model will be filed under separate FCC IDs. You are correct; the particular model that was discussed on June 4, 2010 was a prototype, and not specifically the above-referenced FCC ID. However, it is representative of the product discussed.

The Form 731 has been amended to add this KDB no.

FCC KDB Inquiry 502978 provided guidance for: (1) 5mm test distance for all edges and 7.5 mm conservative test distance at the top edge of the 7" device form factor based on the location of the video conference camera located at the top of the upright device, and (2) 7.5 mm test distance relaxation for GPRS modes for the back of the device, based on the short transmission exposure use of GPRS technology compared to technologies like HSPA.

The camera on back face (which was present on the device during the meeting), was not considered relevant in the discussion since it was not used for prolonged exposure video conferencing calls, but only for standard digital camera use.

For this application, the applicant had chosen to follow the guidance based on the form factor and camera location (i.e. 5mm edges, 7.5mm top), but chose to test at the more conservative distance of 5mm for all edges and the back.

Therefore, the part of the guidance used in this filing from KDB Inquiry 502978 was related to the form factor/video conference call camera location only, and not to the transmitter technology.

2) In general, and as was stated in KDB inquiry 502978 for the separate and different device considered therein, SAR reports must include stand-alone self-contained explanations and justifications for all tested configurations and modes, especially when using non-standard test procedures; please revise SAR report accordingly.

Please find uploaded an updated revised SAR report including stand-alone self-contained explanations and justifications for all tested configurations and modes.

3) 2.1033(c) does allow draft user operating instructions to be submitted, and final instructions to be submitted as soon as available. The user manual on file has the following several inconsistencies and concerns; please revise as appropriate.

- a) EMC/radio and SAR reports call it model "SHW-M180S", user manual says "SCH-M180S" = inconsistent; please revise as appropriate
- b) user manual appear to have significant duplication / redundancy of similar or identical text and/or topics, e.g. explosive (pdf pp 14, 20), road safety (pdf pp 12, 19), emergency calls (pp 14, 20) etc; therefore seems a pre-market version; please revise as appropriate
- c) the entire section at pdf pp 8-12 pertaining to FDA text and starting "Consumer Information on Wireless GALAXY" appears to be misleading or even incorrect, i.e. as far as we know US FDA has NOT published specific information about RF exposure from "wireless GALAXYs" as stated and implied; however FDA may have published similar information about GENERIC wireless communications device; please revise as appropriate

Please find uploaded users manual which addresses 3)a)-c).

4) at user manual pdf pg 8, text about body-worn accessories if any, based on spacing in SAR tests, may be inappropriate and/or not applicable for this and/or device considered in KDB inquiry 502978, and as related to preceding items about revising filing to justify configurations tested. Please revise as appropriate.

Please find uploaded users manual which addresses 4).

FYI in general for basic mobile-phone handset devices, body-worn test separation distance should be appropriate for the types of over-the-counter body-worn accessories available for the specific device being certified; filings should include appropriate related supporting statement in SAR report to demonstrate compliance.

Noted.