

Mike Kuo

From: Mike Kuo
Sent: Monday, August 21, 2006 12:42 AM
To: 'Daniel Lee \(\李春和\)'; David Woo
Cc: Ivonne Wu \(\吳宜芳\)
Subject: RE: Palm, Inc., FCC ID: O8F-KITT, Assessment NO.: AN06T5952, Notice#1

Hi Daniel :

Regards to the reply to question #9 :

Question #9 : The necessary bandwidth listed in the test report for GSM/EDGE modulation is 300 kHz. Please provide data to justify 300kHz necessary bandwidth.

Reply to #9: We measured bandwidth based on 99% bandwidth. The data are shown in page page 15/91 ,16/91, 19/91, 20/91 etc.

Mike Kuo: In the test report, you listed the necessary bandwidth as 300kHz (300KGXW - GSM) and (300KG7W- EDGE). I noticed you have performed 99% bandwidth in page 15/91 (GSM-244kHz) , 16/91 (GSM-240kHz) and 19/91 (EDGE-244kHz). Measured 99% bandwidth does not agree with the necessary bandwidth (300kHz) that you used. Please base upon the widest 99% bandwidth that you measured as necessary bandwidth and modify page 2/91, type of emission for GSM/EDGE/WCDMA.

Regards to the reply to question#12

I have reviewed your added justification in 3.4.3 of revised SAR test report. Based upon the measured head SAR, the highest measured SAR value (1.16 W/kg) was measured at WCDMA Band II without camera @ Right cheek. There are no more investigation on WCDMA Band II without camera. With this limited evaluation result on WCDMA Band II without camera, I requested to perform additional SAR evaluation. Section 3.4.3 justification does not over-write my request for additional SAR evaluation. Please provide additional SAR evaluation at the following conditions:

- Right Tilted WCDMA Band II / mid channel without camera / main battery
- Right cheek WCDMA Band II / mid channel without camera / main battery
- Left cheek WCDMA Band II / mid channel without camera / main battery
- Left Tilted WCDMA Band II / mid channel without camera / main battery

Best Regards

Mike Kuo
Compliance Certification Services
561F Monterey Road
Morgan Hill CA 95037
Tel: (408)463-0885 x: 105
Fax: (408)463-0888

e-mail:mike.kuo@ccsemc.com
<http://www.ccsemc.com>

-----Original Message-----

From: Daniel Lee \(\李春和\) [<mailto:Daniel@sporton.com.tw>]
Sent: Friday, August 18, 2006 3:19 AM
To: Mike Kuo; David Woo
Cc: Ivonne Wu \(\吳宜芳\)
Subject: RE: Palm, Inc., FCC ID: O8F-KITT, Assessment NO.: AN06T5952, Notice#1
Importance: High

Dear Mike,

Please find the responses as below again. We just uploaded the updated SAR, EMC reports and tune-up procedure, operational description.

8/21/2006

1. Done by Ivonne
2. Done by Palm
3. Done by Palm
4. ~ 6. Done by Palm
7. The chip solution is MCM6275, not MCM6250. MCM6275 support GSM and GPRS/EDGE class 10. It does not support both simultaneous voice and data transmission.
8. New version is updated in the EMC report.
9. We measured bandwidth based on 99% bandwidth. The data are shown in page 15/91, 16/91, 19/91, 20/91 etc.
10. Sumsang battery was used for testing and it was illustrated in the updated report.
11. Updated Op. Des. and tune-up procedure was uploaded. We added testing rationale section and WCDMA test modes data in Appendix B, which measured output, bandedge and conducted spurious emission on all WCDMA modes to provide the justification. CMU link plotings are also in the Appendix B.
12. We updated SAR report to include testing rationale section to explain the testing subset.
13. If the belt clip does not have metal, retesting on 1.5 cm is not required, right?
14. The clip belt can only allow keypad face up.
- 15 ~ 16. The peak SARs for both 1st and 2nd hot spot were marked in the plottings.
17. The testing rationale section and the appendix D explain the testing justification.

Thank you so much for the further comments asap because we need to finish this project within one week.

BR
Daniel

-----Original Message-----

From: Mike Kuo [<mailto:mike.kuo@ccsemc.com>]
Sent: Wednesday, July 26, 2006 7:37 AM
To: David Woo; Daniel Lee (李春和)
Subject: FW: Palm, Inc., FCC ID: 08F-KITT, Assessment NO.: AN06T5952, Notice#1

Hi David and Daniel :

Sorry for the delay. I just finished the review on the above subject application with few questions.

Best Regards

Mike Kuo
Compliance Certification Services
561F Monterey Road
Morgan Hill CA 95037
Tel: (408)463-0885 x: 105
Fax: (408)463-0888

e-mail:mike.kuo@ccsemc.com
<http://www.ccsemc.com>

-----Original Message-----

From: Mike Kuo
Sent: Tuesday, July 25, 2006 4:35 PM
To: Mike Kuo
Subject: Palm, Inc., FCC ID: 08F-KITT, Assessment NO.: AN06T5952, Notice#1

Administrative portion :

Question #1: This PDA phone contains Bluetooth transmitter which subject to 15.247 technical requirements. When the device contains transmitters which are operational in multiple FCC rule part, composite application is required. Please submit a separate TCB application for Bluetooth portion under DSS equipment category.

Question #2: Please provide External and Internal photos of device.

When taking the internal photos, please make sure to remove all internal RF shielding (if any) .

8/21/2006

Question #3: Please provide FCC ID label format and proposed label location.

Question #4: User manual: Page 11 and page 232 of user manual mentioned that this device can support 1xRTT and 1xEVDO operation which does not agree with this filing. Please explain.

Question #5: User Manual : Page 217- Based upon the wireless management sub-screen, this PDA is capable of Wi-Fi communication and page 257 under RF exposure compliance. Please explain how the Wi-Fi communication will be activated by what type of device.

Question #6 : User manual : Page 258 the information contains in this page does not agree with the device filed in this application. Please explain.

Technical portion

Part 22/24 / GSM/GPRS/EDGE modulation portion

Question #7: Based upon Qualcomm MCM6250 specification, it supports GSM/GPRS Class 10 but not EDGE. In this test report, the declared modulation supported are GSM/EDGE/WCDMA modulation.

- does this device support GPRS modulation ?
- does this support dual transfer mode which enable simultaneous transmission of Data and voice ?
- If this device supports GPRS modulation, please inform the data class ?
- Please confirm EDGE modulation is applicable to this device.

Question #8 :Measurement procedure: The acceptable measurement procedure for licensed transmitter is ANSI/TIA/EIA-603-B-2002. As indicate in the test report, TIA/EIA 603 Rev. A is used. Please review the newest TIA/EIA standard and provide a statement of compliance with new measurement standards.

Question #9 : The necessary bandwidth listed in the test report for GSM/EDGE modulation is 300 kHz. Please provide data to justify 300kHz necessary bandwidth.

Question #10 : Two batteries are listed in the test report, which battery was used during the tests?

Part 22/24 WCDMA modulation portion

Question #11: In the theory of operation or in the tune up procedure, there is no information provided to disclose the capabilities of WCDMA modulation. Per Qualcomm MCM6250 specification, which can support WCDMA/UMTS with Rev. 99. Through out the test report, there is no information provided which mode of configuration was used and linked between the EUT and CMU 200.

- Please provide WCDMA mode of operation supported. Typical information may include but not limit to : Power Class (TS 25.101 clause 6.2.1), 3GPP TS specification, HSDPA capabilities, number of radio frame, slot and sub-frame etc.
- Please provide several screen shots of CMU 200 link status to disclose the model of communication used during the tests.
- Based upon the WCDMA capabilities, since there is only one mode of operation was tested. Please provide justification to support the tested mode reflects compliance under all operational modes.

SAR portion :

Question #12: Based upon section 12 of SAR evaluation table, PDA without camera demonstrated the highest SAR readings. Please provide additional test data for the following configuration :

- Right Tilted WCDMA Band II / mid channel without camera / main battery
- Right cheek WCDMA Band II / mid channel without camera / main battery
- Left cheek WCDMA Band II / mid channel without camera / main battery
- Left Tilted WCDMA Band II / mid channel without camera / main battery

Question #13: Body worm SAR evaluation only performed with supplied accessory. User manual stated 1.5 cm air gap separation distance without SAR evaluation to support compliance. Please provide additional body worm with 1.5 cm air gap separation or modify the user manual.

Question #14: Will the holster be capable of hosting the device with keypad face down ?

Question #15:Page 51, SAR plots - Right Tilted @ 1800 MHz . The highest peak is out of zoom scan area and display secondary peak. Please verify the device position and provide the SAR reading for the secondary hot spot.

8/21/2006

Question #16:Page 63, SAR plots - right tilted @channel 9400 / main battery. The highest peak is out of zoom scan area and display secondary peak. Please verify the device position and provide the SAR reading for the secondary hot spot.

Question #17: For WCDMA mode of operation, please address the same concerns as stated in question #11.

FYI: To use the highest radiated output power or highest RF conducted output power as the justification for selecting the mode of operation during SAR evaluation will not be acceptable. Near field and far field measurement will demonstrate different result based upon the modulation, data rate and frequency.

Best Regards

Mike Kuo

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.