



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

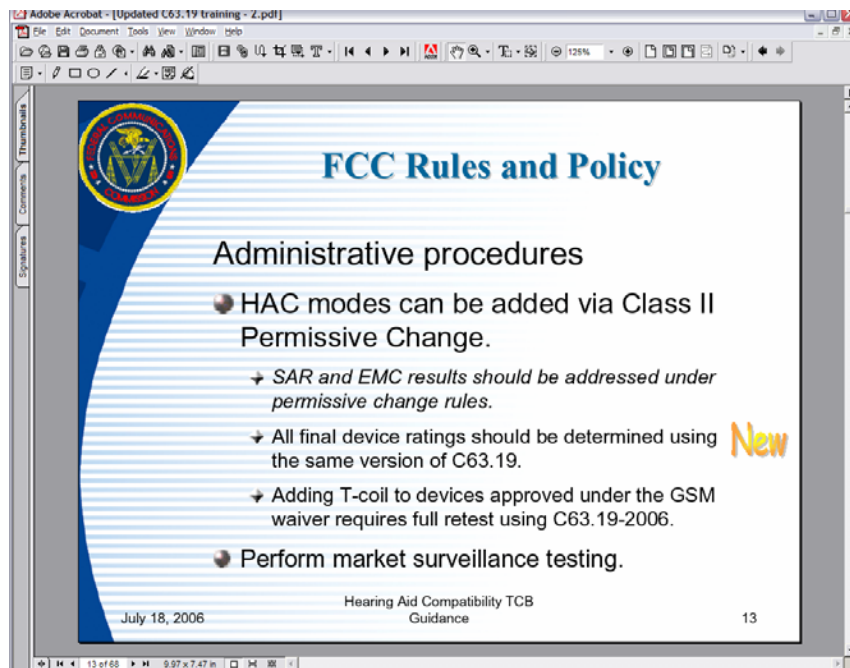
September 15, 2006

RE: Kyocera Wireless Corp.

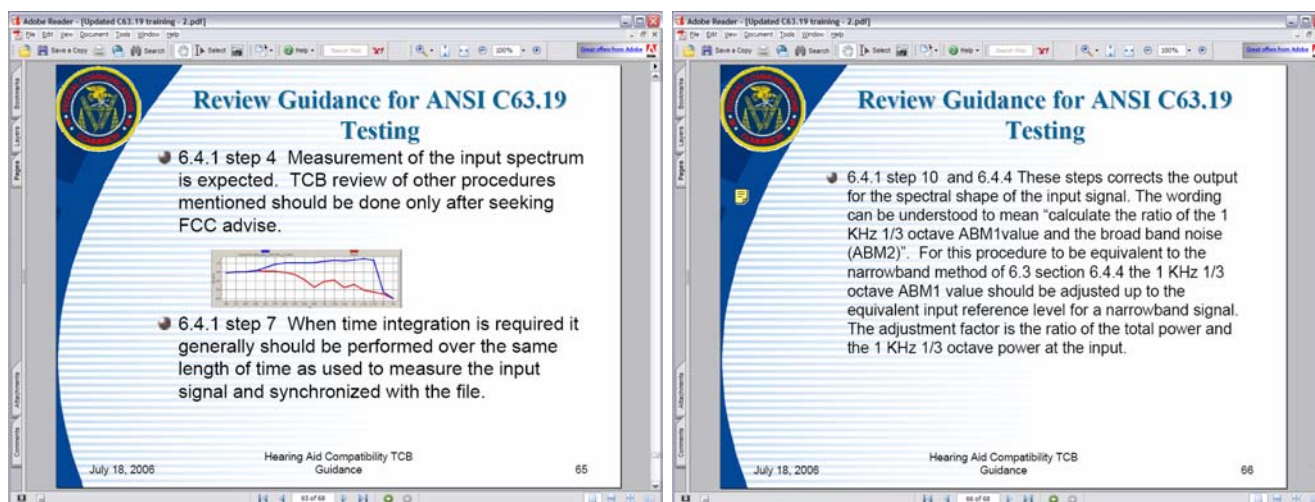
FCC ID: OVFKWC-K24-2J0

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) The FCC ID for this device is only for Part 24. However the manual suggests Bluetooth as well. Please explain as original application and labeling do not appear to support Bluetooth. Note model in report cites 325, but manual cites 323.
- 2) Users Manual page 4 only mentions M rating. Manual should be updated as appropriate for T rating.
- 3) It is uncertain if the device requires any specific T-coil modes where certain items should be turned off (i.e. backlight, BT, etc.). The user is required to be appropriately informed of this fact. Please explain and/or provide updated users manual pages or appropriate insert information that show the user is properly informed of these limitations. Additionally please note that turning this mode on should not disable basic phone capability..
- 4) User instructions for control of the T-coil modes appear to be provided on page 47 of the manual. However, instructions should also include:
 - a) explain how to use the device (i.e. antenna position usages, etc.)
 - b) provide details of any special user selectable HAC modes (HAC mode may turn off back light, BT, T-coil on, etc.)
- 5) Page 5 should likely cite 2.1033(d). Please review.
- 6) When adding or changing a rating, determination of both RF emissions rating and T-coil rating must use the same version of the C63.19 standard. Please review/explain, etc.

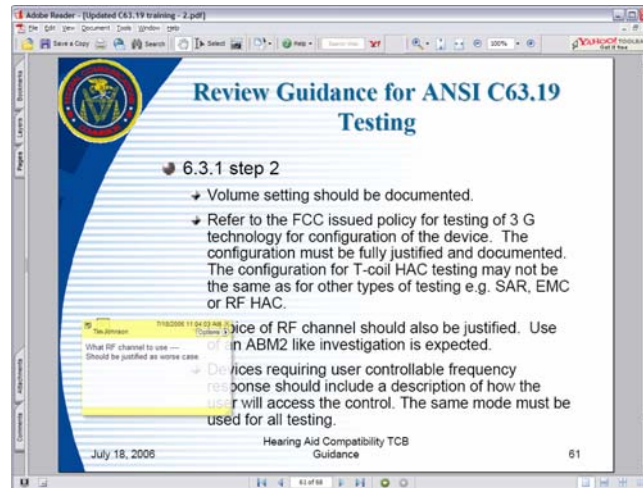


- 7) It is uncertain why the table on page 30 which mentions 7-7 actually appears different than given in the standard.
- 8) Page 17 – Please verify the date use for ANSI C63.19.
- 9) FYI...Final device T-coil mode rating is the lower of the RT category (RF centered T-coil) or the signal quality category given in Table 7-7. It is suggested the report show proper RF T-coil levels. In this case it is found in the previous report.
- 10) FCC does not allow for reduced RF power or limited capability on protocol of air interface for HAC modes. It is uncertain how this device was handled.
- 11) Volume setting should be documented.
- 12) It appears the communication test set may have been out of calibration. Please review page 33.
- 13) On page 42 please explain why the tabular data appears to be different than shown on the plots. Page 38 at first impression appears to be correct.
- 14) It is uncertain if a sine wave or P.50 test signal was used. If a sine wave signal was used, it is uncertain how the voice coder will handle it (i.e. assurance that it will pass CW correctly). Also some base station simulators require a special vocoder calibration. If so, calibration details should be provided and clear. If a P.50 signal was used, this generally requires integration over time because of the variation of amplitude over time. Information regarding proper time lengths should be provided.
- 15) It is uncertain if measurements under section 6.4 were used. If so, the FCC has specific concerns, such as the input should be directly measured (FCC Desires measured, not calculated). If not we are told we must consult with the FCC for further information. Please explain.



- 16) Report does not appear to document AWF factor used.
- 17) Please explain if the CDMA is IS95, IS2000, or 3GPP based handset. Test configurations should follow FCC recently released 3G policies. The configuration must be fully justified and documented (see attached info for more detail). For instance, please explain

For T-coil compliance, modes that produce higher levels of base band magnetic noise are of interest for the ABM2 measurements, such as RF modes with high peak-to-average power ratio, noisy display settings, or operational modes requiring high digital computations/processing. Additionally, ABM1 measurements might be influenced by audio processing such as vocoder or audio auto leveling options and should be investigated.



- 18) Calibration of the probe does not appear to address if the probe was calibrated as part of the system (specific cable, measuring amplifier, etc). Information from FCC suggests that generally these are calibrated as a system and that frequency and amplitude are calibrated for the combination, and in some cases even includes a specific cable.
- 19) Please comment on the system and how the system meets the requirements of D.17.

A handwritten signature in black ink, appearing to read "Timothy R. Johnson".

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

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.