



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

August 24, 2006

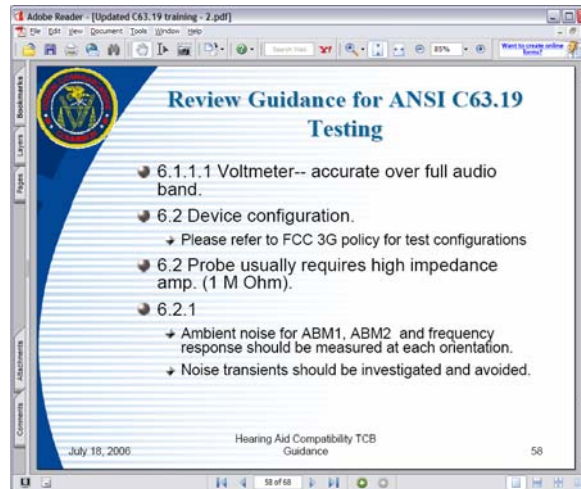
RE: Kyocera Wireless Corp.

FCC ID: OVFKWC-K24B

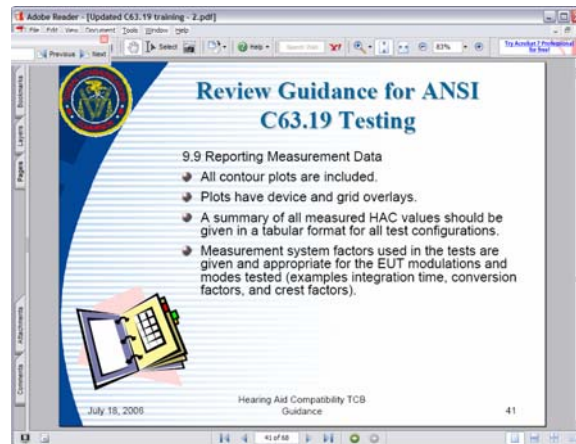
After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) Information in a cover letter suggests that certain features (i.e. backlight, possible BT) may be turned off. According to recent FCC information, the user must be informed of these facts. Please provide updated users manual pages or appropriate insert information that show the user is properly informed of these limitations. Additionally turning this mode on should not disable basic phone capability. Please comment on this fact as well.
- 2) User instructions for control of the T-coil modes must be provided. Additionally, this control should be as simple and quick as possible. Please provide appropriate information. Instructions should include:
 - This information should
 - a) be complete and easily understood by a lay person,
 - b) explain the HAC rating system for both the wireless device and hearing aids and there use as a pair.
 - c) explain how to use the device (i.e. antenna position usages, etc.)
 - d) provide details of any special user selectable HAC modes (HAC mode may turn off back light, BT, T-coil on, etc.)
- 3) Please explain what is meant by the version of the standard is C63.19 – 2006/5. There are some differences between the 2005 and 2006 editions. Additionally, the FCC insists that all tests for both M and T coils use the same version. Please define.
- 4) 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.
- 5) Original EMC report cited a conducted output power of 24.9 dBm for 800 MHz CDMA and 23.2 dBm for 1.9 GHz CDMA. The HAC report mentions only 24 dBm maximum. Note that > 0.5 dB for this type of device is typically reviewed as an intentional change of power and is not normally allowed as a PC application. Please review.
- 6) Page 5 of the report mentions an overall M rating. Is this correct or should this be a T rating?
- 7) It is uncertain why the table on page 30 which mentions 7-7 actually appears different than given in the standard.
- 8) It appears that testing was performed in July, but test equipment was all due for calibration in June/May (see page 32). Please explain.
- 9) It appears that the grid was centered on the acoustic output center. Is the t-coil located in the sme location?
- 10) On page 36 & 37 please explain why the tabular data appears to be a few dB different than shown on the plots. Page 38 at first impression appears to be correct.
- 11) Page 41 does not define the worse case channel reported as implied.

- 12) Although ANSI C63.19 7.3.2 asks only for the axial frequency response, the FCC appears to desire all 3 orientations to be measured (see below). This appears to be for the Validation setup. However given limits are specified in section 7.3.2 are only specified for axial, we have a pending question with the FCC in effort to confirm this issue.

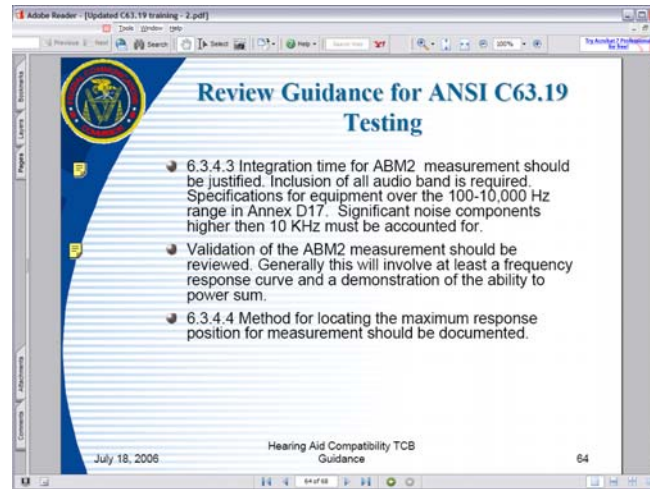


- 13) It appears that the 900 MHz frequency response should be compared to the limits of Figure 7-1, not 7-2. Please review data provided.
- 14) The measurement grid appears to be centered on the acoustic output and not the t-coil output as specified by ANSI C63.19 A.3
- 15) It appears that contour and field distribution plots were only provided for 800 MHz CDMA. Please provide for 1900 as well. Note the following:

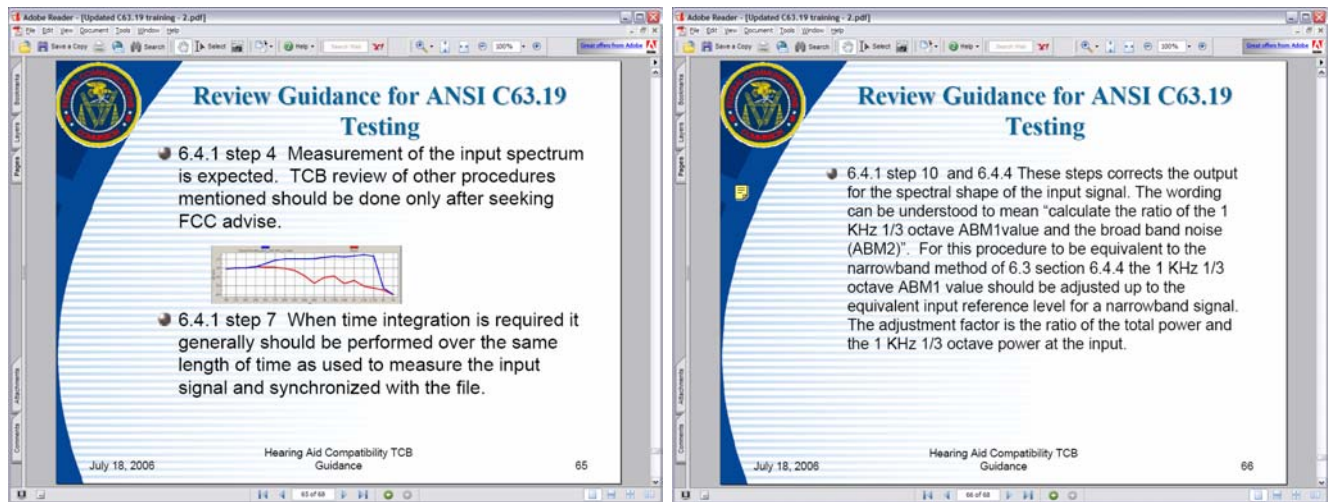


- 16) Volume setting should be documented.
- 17) It is uncertain if a sine wave or P.50 test signal was used. If a sine wave signal was used, it is uncertain how the voice coder will handle it (i.e. assurance that it will pass CW correctly). Also some base station simulators require a special vocoder 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.
- 18) Use of multiple signal types for the different measurements should be clearly documented and justified. Example 1 KHz CW for ABM1 per 6.3 procedure, and P50 for frequency response per 6.4. Currently the specific signal types actually used (vs. a generic procedure) could not be determined.

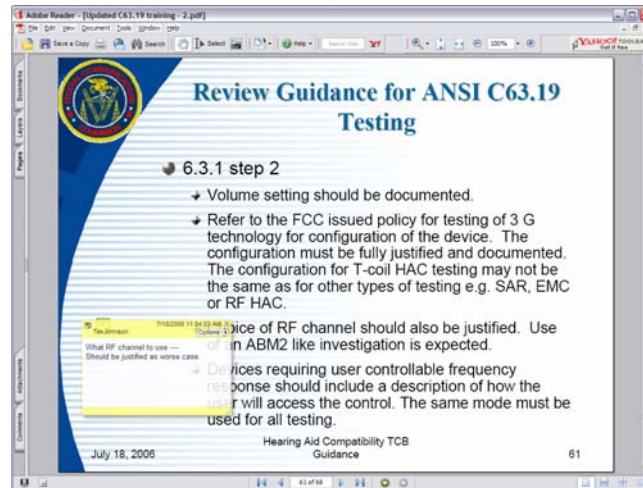
- 19) For ABM2 measurements, please justify integration times used and ensure inclusion of the whole audio band. Additionally, please help address the FCC's concern with "demonstration of the ability to power sum as cited below".



- 20) 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.



- 21) Section 7.3.3 of ANSI C63.19 implies that an RF T-coil location evaluation may be required as well and that the final T-coil rating is the lower of the RF Clause 4 (t-coil centered) and Clause 6 testing.. Note that we have a pending question with the FCC to confirm this understanding.
- 22) Report does not appear to document AWF factor used.
- 23) 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.



- 24) 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.
- 25) 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.