

Mr. Timothy Johnson
ATCB

RE: Kyocera Wireless Corp.
FCC ID: OVFKWC-K24B

Attached:

Dear Mr. Johnson,

Please find forthwith the responses to the questions submitted to APREL Laboratories in respect to the above noted FCC ID.

For Question numbered 1 we measured the conducted power via the base-station simulator and the deviation measured could be the loss due to cable and connectors and manufacturing variability between devices.

2) Test configurations should generally 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.

This device was tested under CDMA2000; Service Option 3, Radio configuration 1 (RC1).

Device settings were supplied by manufacturer and assumed to represent typical usage.

3) Page 5 should likely cite 2.1033(d). Please review.

This has been reviewed and we agree that 2.1033(d) should be included.

4) It does not appear that previous questions 24/25 were responded to.

Please see the following:

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.

24) The probe was calibrated as part of the system along with all ancillary equipment using a Helmholtz Coil and TMFS as per C63.19 2006. We then ran a verification measurement using the complete system and associated equipment on the TMFS prior to testing the DUT to confirm that the system is acting as originally designed and calibrated. This test data is included in the test report submitted.

25) For the full band integrator we utilize a physical quantity (filter) which is applied between the T-Coil probe and data acquisition card. This is a permanent feature of our system and remains as a constant. For the half band integrator the data from table D.8 is adopted within our software and is applied as a post processing correction factor to ABM2.

5) By FCC requirements, 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, given the M rating appears to use the 2005 standard. Please note that:

Kyocera Wireless confirmed that the M-Rating did not change when the T-Coil was in use. To allow for ATCB to review this report we cited both 2005 and 2006 due to the fact that the 2006 version of the standard was not available at the time of the project inception. Due to the circumstances of both Kyocera and the release date of the 2006 version of the standard we felt it prudent to show that we are in compliance with both sets of requirements and that this device as assessed remains consistent with the original M-Rating as tested.

I trust that you have sufficient information to proceed with this application.

Thanks,

Stuart Nicol