

Justification Letter

Date (27/08/2012)

BABT TCB
Balfour House,
Churchfield Road,
Walton-on-Thames,
Surrey,
KT12 2TD

Dear Sir or Madam,

We,

Huawei Technologies Co., Ltd.
Bantian, Longgang District, Shenzhen, 518129, China

hereby to do the Justification on original FCC application: HSDPA/UMTS/GPRS/GSM/EDGE Mobile Phone with Bluetooth, HUAWEI U8651S, U8651S, Summit, FCC ID: QISU8651S as following:

HUAWEI U8651S, U8651S, Summit is a mobile phone, which supports GSM850/900/1900/1800 and WCDMA850/AWS/1900.

The difference between U8651T (Product type: HSDPA/UMTS/GPRS/GSM/EDGE Mobile Phone, Model No.: U8651T, HUAWEI U8651T, U8651, Astro, FCC ID: QISU8651T, Grant date: 2012-03-06) and U8651S:

U8651T is a mobile phone, which supports GSM850/900/1900/1800 and WCDMA850/AWS/1900.

U8651S have the identical electronic structure with U8651T, except:

- 1) U8651S cancel the hotspot mode through software base on old U8651T. The PCB and circuit are the same. It doesn't affect all the radio bands performance.
- 2) With different model no, and with different silkscreen on the back cover.

So in FCC application for U8651S (FCC ID: QISU8651S),

Test data for GSM/GPRS/EDGE 850MHz, WCDMA/ HSDPA 850MHz in submitted report "SYBH(Z-RF)002022012-2007" is from report "SYBH(Z-RF)002022012-2001" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 22 remains valid and applicable and they are representative of the compliance of U8651S.

Test data for GSM/GPRS/EDGE 1900MHz, WCDMA/HSDPA1900 in submitted report "SYBH(Z-RF)002022012-2008" is from report "SYBH(Z-RF)002022012-2003" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 24 remains valid and applicable and they are representative of the compliance of U8651S.

Test data for WCDMA/HSDPA1700 in submitted report "SYBH(Z-RF)002022012-2009" is from report "SYBH(Z-RF)002022012-2002" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 27 remains valid and applicable and they are representative of the compliance of U8651S.

Test data for Part 15B Unintentional Radiator in submitted report "SYBH(Z-EMC)028082012-2" is from report "SYBH(Z-EMC)028012012-2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 15B remains valid and applicable and they are representative of the compliance of U8651S.

Test data for Part 15C Bluetooth in submitted report "SYBH(Z-RF)002022012-2011" and "SYBH(Z-RF)003022012-2010" is from report "SYBH(Z-RF)002022012-2005" and "SYBH(Z-RF)002022012-2004" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 15C remains valid and applicable and they are representative of the compliance of U8651S.

Test data for Part 15C WLAN in submitted report "SYBH(Z-RF)002022012-2012" is from report "SYBH(Z-RF)002022012-2006" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to Part 15C remains valid and applicable and they are representative of the compliance of U8651S.

SAR Test data for GSM850/1900, WCDMA850/1700/1900 refer to report "RZA1201-0064SAR01R2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to OET Bulletin No. 65, Supplement C-2001, IEEE 1528-2003, IEEE Std C95.1-1999, KDB 648474 D01 remains valid and applicable and they are representative of the compliance of U8651S.

New SAR Test report "SYBH (Z-SAR)006082012-2" was list the summary results, which partly from the report "RZA1201-0064SAR01R2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and repeat test on U8651S at the worse case from report 'RZA1201-0064SAR01R2', then to representative of the compliance with the SAR requirement of U8651S.

HAC Test data for GSM850/1900, WCDMA850/1700/1900 refer to report "M test report: RZA1201-0064HAC01R2" and "T test report: RZA1201-0064HAC02R2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and this data according to ANSI C63.19-2007 remains valid and applicable and they are representative of the compliance of U8651S.

New HAC Test report (M test report: SYBH(Z-SAR)006082012-H1" was list the summary results, which partly from the report "M test report: RZA1201-0064HAC01R2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and repeat test on U8651S at the worse case from report "M test report: RZA1201-0064HAC01R2", then to representative of the compliance with the HAC requirement of U8651S.

New HAC Test report (T test report: SYBH(Z-SAR)006082012-H2" was list the summary results, which from the report "M test report: RZA1201-0064HAC01R2" in FCC application for U8651T(FCC ID: QISU8651T, Grant date: 2012-03-06), and representative of the compliance with the HAC requirement of U8651S.

Sincerely,

For and Behalf of:
Huawei Technologies Co., Ltd.



Zhangxinghai
EMC Laboratory Manager