

February 12, 2003
RE: Winston NeWeb
FCC ID: NKRUSB400

Dear Mr. William,

Here are our answers.

I have a few comments on this Application.

1.) In the future, please segregate photographs into External and Internal exhibits.

A: I thought I have segregated them, EUT 1 as External, EUT 3 & 4 as Internal. Or there is some errors while uploading. I will pay more attention next project.

2.) Although there are two oscillators listed on the block diagram, the diagram seems to not comply with the provisions of 2.1033(a)(5) where the signal path and frequency shall be listed at each block. Please review.

A: I updated the block diagram, refer to the uploaded file “USB-400 Block Diagram-updated”

3.) Two manuals were uploaded. Which one should be used for review? I examined the most recent upload according to the date the files was created on our server. That one has references to 20cm separation distance between the user and device. This is not appropriate when a SAR report is presented.

A: The two manuals are the same. I updated the manual, refer to the uploaded file “5B USB-400 manual_update”

4.) The Schematics reference an “Optional Populated” section. This is not appropriate. Only testing performed with and without the optional components could be accepted by the Commission for filing under a single FCC ID, or filing as a fully populated device only.

A: I updated the Schematics, refer to the uploaded file “USB- Schematics -updated”

5.) The SAR report in Section 2.1 references an RF Pout of 87.09mW, but later in Section 3 references 30.7mW. Which is correct? Please review and correct as needed.

A: updated as uploaded file “SA920116R05- REPORT & ABCD-update” (answered from ADT).

6.) In the SAR report, I am concerned with the interference of the lid in Mode 1. Please demonstrate this is the “worst case” position. In other words, please provide evidence that Mode 1 with the LCD lid of notebook computer perpendicular to phantom is not “worst case” relative to LCD lid parallel to phantom.

A: the Mode 1 is the worst case then I have confirmed the LCD lip of the notebook. The worst case position is the LCD lip parallel to the phantom. Please see the attachment documents are the LCD lip perpendicular to phantom position. The SAR values are smaller than the mode 1 position. So I think that the mode 1 position is the worst case. (answered from ADT).

(See file under test report exhibit type: USB-400 mode 4 ch01.pdf; USB-400 mode 4 ch06.pdf; USB-400 mode 4 ch11.pdf)

7.) Although listed elsewhere in the SAR report, it would be helpful to identify the test platform by make and model on each “Mode” photograph.

A: We will improve next project

8.) The Mode Two plots in the SAR report appear strange – especially when using the scale supplied on the right hand side of each plot. Are you showing the highest SAR occurred in fields around the EUT, and not centered on the EUT? Please confirm.

A: I have confirmed the EUT positon and I adjusted the coarse area. That area is larger than the first coarse area, and the report have been revised (answered from ADT).

updated as uploaded file “SA920116R05- REPORT & ABCD-update”

9.) The Test Setup photos are difficult to use. Can you please supply a close up showing where the EUT was positioned in the setup?

A: I have captured one set of close-up photos, both inserted in the test report and segregately uploaded under test set-up photo exhibit type.

10.) The Test Report does not provide any graphical presentations (plots) for any of the 15.247 parameters. This will not be acceptable. Please review and supply at minimum Occupied Bandwidth, Spectral Power Density, Band Edge (preferably both radiated and conducted), and 6dB Bandwidth. A plot of the Powerline Conducted Emissions 15.207 is also preferred.

A: I have revised the test report, refer to the uploaded file “03LR001FC-updated”

11.) Please show how label identified in Appendix 9 of Test Report will be affixed to EUT. This does not seem to match the Label information provided in the Label and Location exhibit to AmericanTCB.

A: I updated the 9.1 Appendix A, refer to the uploaded file “03LR001FC-updated”

Any insufficiency, please feel free to contact me through E-MAIL.

Thanks for your help.

Daphne Liu 2003/02/12