

Justification Letter

Date (10/06/2012)

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 FCC application: cdma2000 Digital Mobile Phone, HUAWEI M866, M866, Class 2 permissive change for FCC ID: QISM866 as following:

cdma2000 Digital Mobile Phone HUAWEI M866, M866 is subscriber equipment in the CDMA/EVDO system. The frequency band is US Cellular and N. American PCS and AWS, But only AWS Band test data in this report. The Mobile Phone implements such functions as RF signal receiving/transmitting, CDMA2000 1x and 1XEV-DO protocol processing, voice, MMS service, GPS, AGPS and WIFI etc. Externally it provides micro SD card interface, earphone port (to provide voice service). It also provides Bluetooth module to synchronize data between a PC and the phone, or to use the built-in modem of the phone to access the Internet with a PC, or to exchange data with other Bluetooth devices.

The difference of HUAWEI H866C, H866C(cdma2000 Digital Mobile Phone, HUAWEI H866C, H866C, FCC ID: QISM866, Grant date: 2012-06-12) and HUAWEI M866, M866:

HUAWEI H866C, H866C is a cdma2000 Digital Mobile Phone, which supports CDMA band BC0, BC1, WIFI, Bluetooth.

- 1) HUAWEI M866, M866 adds the CDMA BC15 through software changes. The PCB is the same, so It doesn't affect the other bands performance.
- 2) Model no. had been changed.

The difference between HUAWEI M866, M866 and HUAWEI H866C, H866C is showed in below table:

	HUAWEI M866, M866	HUAWEI H866C, H866C
supports bands	BC0, BC1 and BC15.	BC0, BC1
FLASH	the same	the same
PCB	the same	the same
Appearance	the same	the same
Bluetooth mode	the same	the same
WLAN mode	the same	the same
BT/ WLAN antenna	the same	the same
GSM/ WCDMA antenna	the same	the same
External camera	the same	the same
internal camera	the same	the same
Adapter	the same	the same
Battery	the same	the same
Chipset	the same	the same
Memory	the same	the same
Form factor	Bar type, Internal antenna	Bar type, Internal antenna
RF Parameter	the same	the same
BT RF Parameter	the same	the same
Dimension	the same	the same
Weight	the same	the same
Bluetooth	the same	the same
External camera	the same	the same
Main Frequency NV	The same NV in the same band	The same NV in the same band
BT conducted power	the same	the same
WIFI conducted power	the same	the same

So in this FCC application for HUAWEI M866, M866 (Class 2 permissive change for FCC ID: QISM866):

Bluetooth 2.0 test data refer to report "SYBH(Z-RF)005052012-2004", but inside data was reference from report "SYBH(Z-RF)005052012-2009" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12), and this data according to Part 15C remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

Bluetooth EDR test data refer to report "SYBH(Z-RF)005052012-2005", but inside data was reference from report "SYBH(Z-RF)005052012-2010" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12), and this data according to Part 15C remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

WLAN test data refer to report "SYBH(Z-RF)005052012-2006", but inside data was reference from report "SYBH(Z-RF)005052012-2011" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12), and this data according to Part 15C remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

CDMA BC0 test data refer to report "SYBH(Z-RF)005052012-2001", but inside data was reference from report "SYBH(Z-RF)005052012-2007" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12), and this data according to Part 22 remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

CDMA BC1 test data refer to report "SYBH(Z-RF)005052012-2003", but inside data was reference from report "SYBH(Z-RF)005052012-2008" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12), and this data according to Part 24 remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

New Test report "SYBH(Z-RF)005052012-2002" to demonstrate CDMA BC15 comply with the part 27 requirement.

New test report "SYBH(Z-EMC)092052012-2" to demonstrate comply with the Part 15B requirement.

SAR Test data for CDMA BC0, CDMA BC1, WIFI refer to report "SYBH(Z-SAR)040042012-2" in FCC application for HUWEI H866C, H866C(FCC ID: QISM866, Grant date: 2012-06-12), and this data according to OET Bulletin No. 65, Supplement C-2001, IEEE 1528-2003, IEEE Std C95.1-1999, KDB941225 D01, KDB 248227 D01, KDB 941225 D06, KDB 648474 D01 remains valid and applicable and they are representative of the compliance of HUAWEI M866, M866.

New SAR Test report "SYBH (Z-SAR)024052012-2" to demonstrate CDMA BC15 comply with the SAR requirement.

New HAC Test report (M test report: RHA1204-0013HAC01R2; T test report: RHA1204-0013HAC02R3) to demonstrate HUAWEI M866, M866 comply with the HAC requirement. But inside test data for CDMA BC0, CDMA BC1 was reference from report (M test report: RHA1205-0024HAC01R2; T Test report: RHA1205-002HAC02R2" in FCC application for HUAWEI H866C, H866C (FCC ID: QISM866, Grant date: 2012-06-12),

Sincerely,

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



Zhangxinghai
EMC Laboratory Manager