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Jul. 25, 2006

FCC ID: SNMM19

The following lists are the answers for the comments on Jul. 23, 2006. Please kindly have a review on it:

1) Section III, 4(a) of the 731 form should be “PCE”. Please adjust. Also, please fill out Section IV, (1) of the 731 form.
RE: Please see (SNMM19)731Form_rev1.

2) 731 Form for GSM should normally cite 824.2 – 848.8 & 1850.2 – 1909.8 MHz. Please correct.
RE: Please see (SNMM19)731Form_rev1.

3) Block Diagram appears to only show 850 MHz. This appears to be a dual band phone. Please explain as block diagram appears incomplete.
RE: Please see (SNMM19)BlkDia_rev1.

4) Note that users manual mentions GSM 900 and DCS 1900 only. Please clarify all bands the device is capable of operation on as we must appropriately denote the grant for other bands that do not operate in the U.S. (i.e. European bands).
RE: Please see page 49, (SNMM19)UserMan_rev1.

5) It is unclear if the device integrates various shields over the various portions as well. If so, please provide internal photographs to show what device looks like before shields are removed.
RE: Please see page 1, (SNMM19)IntPho_rev1.

6) It is uncertain where the antenna is located and what it looks like. Please update the internal photographs to include or label as appropriate to show it.
RE: Please see page 2, (SNMM19)IntPho_rev1.

7) FYI….The preferred accepted format for FCC Labeling is to include “FCC ID:”, not simply “FCC ID”. It is suggested this be corrected.
RE: N/A

8) For the label it is uncertain if the FCC ID uses an S or another character. Please review.
RE: It is “S”.

9) Generally a Tune Up procedure show the various adjusted levels/limits by the manufacturer during the manufacturing process. More detail should be provided. Please correct.
RE: Please see (SNMM19)PowerSetting.

10) Generally the following information is expected to be provided: a description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power been provided (2.1033(c)(10).

RE: Please see the previous file (SNMM19)Schem. It is seemed that all the information has been included. If not, please tell us in detail what it is since our client does not understand it thoroughly.

11) This device appears to be capable of USB connection to a PC and is therefore also considered a PC peripheral device (in addition to the TX requirements, i.e. Part 22, etc.) and is subject to either a Certification or DoC as a PC peripheral. Therefore the application must clarify if you are asking for:

a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral

b) Certification as a TX + PC peripheral.

RE: We are asking for “a”.

The DoC report is issued by ADT Tai Wan and produced under subcontract by ADT Shanghai.

12) Given the device is much more than a simple phone/TX, the complete 2 part statement of 15.19(a)(3) should be located on the label or manual as appropriate. Please review.

RE: Please see page 2, (SNMM19)UserMan_rev1.

13) Test report cites a battery of 3.9 VDC and the manual cites 3.7 VDC. Please explain if more than one battery is available for this device. Note that for SAR testing, the FCC expects each type of battery to be tested.

RE: Please see page 49, (SNMM19)UserMan_rev1.

14) It is uncertain what accessories (battery, earbud, belt clips/holsters) are provided with the device by the manufacturer. Please clarify.

RE: Please see page 47 ~ 48, (SNMM19)UserMan_rev1.

15) Please explain the reference to TDMA on page 10 of the Part 22/24 report.

RE: N/A

16) Please provide appropriate information to determine the classes (A – C & 1 – 29) associated with this particular GSM transmitter. These define the typical use and type of up/down slots the device is capable of.

RE: What does this comment mean? Is it offered by lab or applicant?

17) All test photographs appear to show the device laying down. For TX fundamental and spurious, this is unusual. Please verify/explain as necessary as it would be expected that the worse case position would be upright.

RE: Please see (SNMM19)TestSup_rev1.

18) For the occupied bandwidth and bandedge, it does not appear that the test was performed using > 1% RBW as specified by 22.917(b) and 24.238(b). Please note that the 26 dB is considered referenced to “total TX power”. For instance, the 0 dB reference would be established using RBW > 300 kHz and then the 26 dB points would be referenced down from this point using a RBW > 1%. This will likely yield an occupied bandwidth a little less than 300 kHz. Please review.
RE: Under handling.

19) Test reports do not appear to contain entire information regarding test equipment for substitution methods (i.e. signal generator, substitution antennas, etc.). Please review.
RE: Please see page 67, (SNMM19)TestRpt.Part22_rev1 &
page 64, (SNMM19)TestRpt.Part24_rev1.

20) FYI…SAR report is still under review.
RE: N/A.

21) FYI…For frequency stability, generally enough time to ensure all components inside the device have reached the desired temperature should occur. Generally anything less than 1 hour is unusual. In the future you may wish to evaluate this.
RE: N/A

22) Please confirm that GPRS mode is not functional in voice mode of operation.
RE: Under handling.

23) Generally Z-axis should be provide for worse case for each configuration (i.e. 850 – Head, 850 – Body, 1900 – Head, 1900 body). If available, please provide.
RE: Under handling.

Thank you very much.