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FCC ID: SNMM19

The following lists are the answers for the comments on Jul. 26, 2006. Please kindly have a review on it:

1) Regarding the labeling, if the device is DoC approved as a PC peripheral device (as mentioned in an earlier response to ATCB), then labeling for DoC is mandatory. There is no exemption based on the fact that the device is a Cellphone. However if the device is to be Certified as a PC peripheral as well (an would be considered a composite application where multiple grants are issued), then the FCC ID alone would be sufficient. However if DoC is being used as previously indicated, then proper DoC labeling is required.

RE: Please see (SNMM19)Label_rev1.

2) Your response cites that the device is a Class A and 11. Note that if this is the capability of the device, there are various concerns to be noted:
   a) if the device is Class 11, it is capable of uploading 3 slots for every 8 slots for GSM. Therefore the data given in the SAR report uses the incorrect crest factor. The SAR shows maximum crest factor of 1:4. However Class 11 would be 1:2.6667 or 3:8 and will affect the results reported for GPRS.
   b) If the device is a Class A, then it is capable of:
      Class A: This class includes devices that are capable of working with circuit-oriented and packet-oriented connections simultaneously. With these mobile telephones, users can begin transferring data during an active voice connection. Class A is at the high end of the GPRS mobile telephone spectrum and includes multifunctional devices or “smart phones.” This would mean that the information presented to the last comment 2 is not correct. Additionally if the device is a Class A device, then the SAR has not been evaluated at the head properly as this was only utilizing GSM with crest factor of 1:8. Please review/correct as necessary.

RE: The information transmission was wrong last time. The correct Class is 4.

3) We are also still awaiting responses to the following items per your last response:

a) Users Manual Page 47 mentions batteries of various capacity are available. The FCC expects each type of battery to be tested. Please review.
RE: Please see Page 47 of (SNMM19)UserMan_rev3. There is only one type of battery available. The sentence that would make person misapprehensive has been corrected.

b) It appears that the newly provided photographs are actually labeling the antenna connector and not the antenna itself. Please review.
RE: Please see (SNMM19)IntPho_rev2.

c) 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). This information is generally an engineering theory of operation that describes in a few paragraphs how the RF circuitry performs the above listed items. Generally this information is also confidential as well and therefore the confidentiality letter should be updated to include “theory of operation” as well.
RE: N/A

4) For the occupied bandwidth and bandedge, it appears that the process of applying the markers was reversed and proper RBW for one trace may not have been used. For instance, in the Part 22 report, page 31 – Marker 2 should be at the highest power of the trace taken with RBW >= 300 kHz (assumed to be Blue trace), and the delta markers 1 and 3 should be located on the trace using RBW > 1% (3 kHz likely) and therefore are assumed they should have been on the **black** trace. The 26 dB down points are measured on the **black** trace, from the marker located on the blue trace. Additionally, it appears that a RBW >= 300 kHz was not used for the blue trace. Please review. Note that estimates from what was provided appears to show a bandwidth about about 250 kHz which is approximate expected value.
RE: Please see (SNMM19)TestRpt.Part22_rev3 & (SNMM19)TestRpt.Part24_rev3.

5) FYI…Please note that the users manual must also include specific DoC information as well. Please ensure proper information gets added to the manual.
RE: N/A

Thank you very much.