1. If not in filing already, please explain typical end-use operations held-near-head and/or body-worn where both part 22/24 transmitters would be transmitting simultaneously

This phone incorporates independent two GSM MODULEs and each GSM MOULE can be operated independently. So when end users use this phone, two GSM MODULEs can be operated simultaneously.

2. SAR report appears to have "silver side" facing phantom and with silver-side transmitting; if device supports operation with silver-side facing phantom and with black-side transmitting independently (stand-alone), SAR testing could be appropriate - please explain and/or revise

Each Silver/ Black side of this phone can be operated independently. When silver side is operated, black side can be also operated (also vice versa). We performed SAR test each silver/ black side and simultaneous operation modes (Both Silver and Black side transmitting simultaneous), Please refer to notes on page 24, 25 for simultaneous operation modes of SAR tests.

3. Same topic as item 2), but with black-side facing phantom and silver-side transmitting independently (stand-alone) - please explain and/or revise

It is same as the answer 2.

4. If not in filing already, please explain procedures used for simultaneous-transmit SAR testing

This device has two licensed transmitters and an unlicensed transmitter. For simultaneous SAR tests, we used KDB648474 v01r03 (FCC SAR Evaluation Considerations for Handsets with Multiple Transmitters on May 2008). Also this is described on the page 17 ~ 18 of the SAR test report. Please refer to detail descriptions on page 17 and 18 of the SAR test report.

5. Filing uses 900 MHz and 1810 MHz probe cal. for 824-849 and 1850-1910 testing - Please provide analysis to address following from KDB 450824 SAR PROBE CALIBRATION .... The following procedures are recommended for DUT measurements at 150 MHz to 3 GHz to minimize probe calibration and tissue dielectric parameter discrepancies. a) In general, DUT SAR measurements below 300 MHz should be within +/- 50 MHz of the probe calibration frequency. SEE ALSO ITEM c). b) At 300 MHz to 3 GHz, DUT measurements should be within +/- 100 MHz of the probe calibration frequency. SEE ALSO ITEM c). c) Measurements exceeding 50 % of these intervals, I.E., +/- 25 MHz, DUT f less than 300 MHz, OR +/- 50 MHz, DUT f greater than or equal to 300 MHz, SHALL APPLY THE FOLLOWING additional steps: 1) When the actual tissue dielectric parameters used for probe calibration are available (careful about some probe manuf. list only nominal or range on calib. cert.), the differences for relative permittivity and conductivity between probe calibration and routine measurements should each be less than or equal to 5 % while also satisfying the required +/- 5 % tolerances in target dielectric parameters. 2) When nominal tissue dielectric parameters are PROVIDED in the probe calibration data, the tissue dielectric parameters measured for routine measurements should be less than the target relative permittivity and higher than the target conductivity values, to minimize SAR underestimations. Otherwise, a thorough analysis of the effective frequency interval supported by the probe calibration and dielectric medium should be included in the SAR report to substantiate the test results - SEE ITEM d). Alternatively, the measured 1-g SAR may be compensated with respect to +5 % tolerances in relative permittivity and -5 % tolerances in conductivity, computed

according to valid SAR sensitivity data, to reduce SAR underestimation and maintain conservativeness. d) When thorough analysis is required for the additional steps, the following SHALL ALSO BE ADDRESSED BY THE DUT TEST LAB. These other items can contribute to additional SAR differences, especially when the probe calibration, tissue dielectric parameters and device test frequencies are misaligned. 1) The probe conversion factor and its frequency response, with respect to the tissue dielectric media used during probe calibration and routine measurements, should be examined to determine if the effective frequency interval is adequate for the intended measurements to satisfy protocol requirements. 2) Measurements within the required frequency interval should satisfy an expanded probe calibration uncertainty (k=2) less than or equal to 15 % for all measurement conditions. 3) When SAR is reported within 10 % of the SAR limit, differences in field conditions and effects of output power levels on signal modulation between probe calibration and routine measurements should be examined to determine probe calibration validity. 4) Probe isotropy should also be assessed by rotating the probe in 15 degree increments at the peak SAR location of the zoom scan and accounted for in the measurement uncertainty. SAR SYSTEM VERIFICATION .... It should be ensured that SAR discrepancies due to probe conversion factor and tissue dielectric parameter differences between the dipole and probe calibration frequencies are also acceptable; for example, less than 10 % to 15 %. ....

SAR tests are re-tested to address additional step for KDB450824 SAR probe calibration.

Please refer to revised SAR test report and KDB450824_additional_step.pdf.