Yunus Faziloglu/USA/VERITAS 05/02/2007 09:35 AM To Kathlene McQuaid/USA/VERITAS

cc bcc

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Subject Please PDF - CS02507 Response to TCB

----- Forwarded by Yunus Faziloglu/USA/VERITAS on 05/02/2007 09:34 AM -----



"Teresa White" <twhite@lsr.com> 04/30/2007 03:52 PM

To Yunus Faziloglu/USA/VERITAS@VERITAS

CC

Subject RE: CS02507 sComm, Inc. FCC ID: UPQ-UBI200A TCB Questions

Hi Yunus,

Here is the response to item 9 below.

The conducted power measurement performed by LS Research, LLC and listed in EMC Report differ with the results performed by PC Test and listed in the SAR Report because of the method in which the results we measured. PC Tested used a power meter to obtain the conducted power measurements. The data recorded by LS Research, LLC was taken using a spectrum analyzer. To verify the results obtained by PC Test correspond to the conducted power measurements by LS Research, LLC, LS Research performed the conducted Power measurements with a Power Meter and here is the test data that was recorded.

## LS Research Power Meter Readings ${\tt PC}$ Test

Channel Channel	· ·	15.53 dBm 15.25 dBm
Channel Channel	•	15.26 dBm 15.50 dBm
Channel Channel		15.10 dBm 15.64 dBm
Channel Channel		1.42 dBm 1.54 dBm

As a result the measurements correspond similarly indicating proper output power was used for SAR testing.

We are still working on item 7.

Thanks.

Regards,

Teresa White
Document Coordinator

LS Research, LLC W66 N220 Commerce Court Cedarburg, WI 53012

Direct: 262.421.4991 Fax: 262.364.2649

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----Original Message----

From: yfaziloglu@curtis-straus.com [mailto:yfaziloglu@curtis-straus.com]

Sent: Friday, April 13, 2007 1:56 PM

To: Teresa White

Subject: CS02507 sComm, Inc. FCC ID: UPQ-UBI200A TCB Questions

Hi Teresa,

Here are the rest of the issues for CS02507, in addition to the items sent earlier below,

- 7. Regarding EMC report,
- i. RF Technical information on page 7 of the test report does not refer to

SAR data

ii. Page 55 of the report includes an MPE calculation which does not apply

to the devices with SAR evaluation. Please clarify/correct.

- 8. Regarding the label
- i. It shows symbol "#" after FCC ID.
- ii. Missing the compliance statement of 15.19(a)(3). The device is large enough to include that.
- 9. Regarding SAR report,
- i. Please clarify why SAR level differences were almost unnoticeable between channel 0 and other channels when there is a large difference in their corresponding conducted power measurements.
- ( See Pg 17 Ch 0 measured power level 9.39dBm and Ch1 measured power 15.31dBm and SAR differences are barely noticeable)
- ii. Maximum RF conducted power in SAR report (15.65dBm) is less than EMC report (16.22dBm) which corresponds to difference of more than 10% in linear terms. The reason for this difference must be justified. SAR tests

are required to be conducted at the highest power level listed in EMC report. If the test methods used to measure the powers were different between the EMC and SAR setups, then it needs to be shown with additional

test data that EMC sample produced same amount of power as the SAR sample  $\,$ 

when measured with the same method.

Best Regards,

Yunus Faziloglu Curtis-Straus LLC Bureau Veritas

---- Forwarded by Yunus Faziloglu/USA/VERITAS on 04/13/2007 02:16 PM ----

Yunus

Faziloglu/USA/VER

ITAS

To

"Teresa White" <twhite@lsr.com>

04/11/2007 04:30

CC

PM

Subject

RE: CS02507 sComm SAR

data(Document

link: Yunus Faziloglu)

Hi Teresa,

To be able to better understand the SAR setup, please supply the following,

1. More detailed external photos showing all sides and ports of the device,  $\$ 

including the screen opened up and closed.

2. Internal photos seem to have some inconsistencies in the way they are labeled. Is the RF section only the upper right side of the board seen on  $\frac{1}{2} \left( \frac{1}{2} + \frac{1}{$ 

page 3 of the document?

- 3. Please supply closer views of the RF section above, with and without the shield with higher resolution photos.
- 4. The PCB side view seems to be missing in the internal photos. Please clarify.
- 5. The RF section seems to have an antenna connector in the internal photos. Please clarify if this is supplied in the end-devices or is it just

a test point?

6. Please point out with a drawing or pointer, where the antenna is located when the device is in use. When the lid is open.

Best Regards,

Yunus Faziloglu Curtis-Straus LLC Bureau Veritas

"Teresa White"

<twhite@lsr.com>

То

04/09/2007 05:31 Faziloglu/USA/VERITAS@VERITAS

PM

CC

Subject

RE: CS02507 sComm SAR data

Yunus

Hi Yunus,

I have attached the SAR report and test setup photos.

Thanks.

Regards,

Teresa White
Document Coordinator

LS Research, LLC W66 N220 Commerce Court Cedarburg, WI 53012

Direct: 262.421.4991 Fax: 262.364.2649

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or opinions presented are soley those of the author of this e-mail, and do

not necessarily represent those of LS Research, LLC, unless otherwise specifically stated.

From: yfaziloglu@curtis-straus.com [mailto:yfaziloglu@curtis-straus.com]

Sent: Tuesday, March 06, 2007 2:27 PM

To: Teresa White

Subject: CS02507 sComm SAR data

Hi Teresa,

I do not see SAR data for this application. 20cm separation distance can not be used for a portable device such as this. Please clarify.

Best Regards,

Yunus Faziloglu Curtis-Straus LLC

Bureau Veritas [attachment "Ubiduo SAR Test Setup Photo.pdf" deleted by Yunus Faziloglu/USA/VERITAS] [attachment "UbiDuo RF Exposure Report.pdf" deleted by Yunus Faziloglu/USA/VERITAS]

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