

PCTEST comments/feedback for FCC KDB 681735 DRAFT

1. The KDB Publication 447498 version/revision number in foot notes 3 (page 5) and 6 (page 6) are not the latest version. In footnote 6, the item number is 4.1.c per the latest publication of 447498 and not item 5.3.
2. On page 10, provision A)1) suggests that the applicant providing an attestation exhibit containing a compilation of all the applicable items for items that will be listed on the grant, but may need further explanation. However, many applicants are not familiar with the specifics of the grant notes or comments. We suggest that the TCB creates the attestation letter for these line items, if necessary, since they will be issuing the grant, indicating that the information supporting the authorization notes is contained in the filing. Otherwise, we suggest removing the requiring for this attestation altogether if possible.
3. On page 10, a new grant note AT is introduced to move the conditions represented in the filing to the attachments. This note seems like it generally could be applicable to every device and transmission mode, so we think "AT" will not carry much meaning and therefore do not recommend the addition of a "AT" grant note.
4. On page 10, for the output power considerations, we suggest including another option for grant note "Output Power listed in peak conducted" for clarity, especially to clarify the power for Part 15 devices.
5. In regards to the body-worn accessory grant notes, it appears that the wording used for SM and SB would contradict each other, but conceptually these concepts should to used together. We suggest revising these to "SAR compliance for body-worn operating configurations is restricted to the specific body-worn accessories, such as belt-clips and holsters, tested for this filing and to accessories that have no metallic component in the assembly." to cover both scenarios.
6. KDB Publication 94122 D05A requires that grant comments for devices with LTE Release 10 (and above) devices include the specific limitations and restrictions on the device. We suggest including sample wording of what the FCC would find acceptable to put on the grants for this limitation. We suggest to use, "This device supports LTE Rel. 10 in accordance with KDB 941225 D05A LTE Rel. 10 KDB Inquiry Sheet, with the limitations and restrictions described in this filing."
7. For technologies that may use multiple bandwidths, such as WLAN or LTE, the FCC has provided some guidance in the past (for example, in KDB Publication 634817) about listing the supported bandwidths as part of the grant remarks. We suggest that these building blocks be addressed and added to this KDB for completeness.
8. In example C, the last line with the highest reported SAR values does not appear to

follow the guidelines in KDB 690783. We suggest removing the duty factor from the last sentence and and revising "body-worn applications" to "body-worn accessories" to align with KDB 690783. Perhaps referring to the KDB publication is appropriate to explain the duty factor and SAR correlation.

8. Table 1 on page 15 is missing code 05 as described on page 10, section B. However, we do not believe Note Code 05 is needed since the note code will be per grant line frequency and the power listed will either be ERP or EIRP, therefore no need to distinguish between the two.

9. In Table 1, a grant code AS is introduced but there does not appear to be a corresponding explanation for it in Section 1. Perhaps referring to a KDB publication is appropriate here to explain further.

10. "MO" should be clarified to transmit diversity, or further clarification is required on Page 18. Usually it is used in context of transmit diversity for WIFI, but this may be misinterpreted to also apply for LTE, with receive diversity for example that some label as "MIMO".