1.) The rules in Part 24 have changed. 24.238 now specifies that Block Edge Measurements and not just Band Edge measurements must now be made. Please refer to 24.229 for a description of the applicable frequency blocks. A copy of these revised specifications is included for your review.

Additional test report has been uploaded.

2.) For all Licensed transmitters, measurements of both the Tx Radiated EIRP and Tx Radiated Spurious Emissions cannot be made using field strength conversion calculations. Only the substitution method is considered valid. Please correct your report. Revised test report has been uploaded.

3.) Please provide details on the Bluetooth RF Pout as listed on Form 731 and the Test Report - radiated, conducted, peak, average, etc.

The values are peak power, measured in conducted manner. A revised test report has been uploaded.

4.) This is an unusual device configuration. Is it possible to hold this phone flat against the head instead of on-edge during normal Cellular operations? If so, then additional SAR results would be required.

The NEM4 is not designed to be used flat against the head. NEM4 has the side phone feature, meaning that during normal cellular operations you have to keep it correctly on its side to be able to communicate. Alternatively you can use the hands free speaker or the headset.

5.) During radiated testing of the Bluetooth transmitter, was this device tested across three orthogonal planes?

The device was tested in three orthogonal orientations. A revised test report has been uploaded.

6.) Please identify the gain of the Bluetooth antenna. The gain is -2dBi. The test report was revised to show this information.

7.) Part 2 of the Manual seems to indicate on pp. 148 that this device is capable of 835MHz operations. Please comment.

There is an error in the draft user manual. Only 900/1800 and 1900 MHz bands are supported. This error shall be corrected in the final User Manual of NEM4.

8.) Is this device capable of operation on any non-US bands? If not, please provide an attestation statement indicating which bands will not be used in US.

The NEM4 device is capable of operating on three GSM bands: 900/1800/1900 MHz. See NEM4 SAR report page 6, section 2.1.

9.) Please indicate where I can find the required information of 15.21. This is required for all Part 15 Intentional Radiator certifications.

UG page 134: "Use only the supplied or an approved replacement antenna. Unauthorized antennas, modifications or attachments could damage the phone and may violate regulations governing radio devices". However, the following text shall be added at the end of the sentence in the final user guide: "Unauthorized modifications may void the user right to use the equipment".

10.) Please refer to page 135 of Manual. 20cm is not 6 inches. This is an error in draft user manual to be corrected in the final user manual.