

1) We note that SAR report has used obsolete (circa 2007) thus inappropriate freq. range for 90 subpart R operations, i.e. need high-middle-low tests based on 763-775 MHz and 793-805 MHz. 775-776 MHz and 805-806 MHz is part 27 upper-700 block B, i.e. not applicable for US part 90. Per policy KDB pub. 634817, test freqs. must be in the rule band.

Response: Noted.

2) Further to item 1), TCB and test lab please be advised that the following also pertains to 90 subpart R frequencies.

a) As of August 30, 2007, narrowband operations in the 700 MHz band have been reallocated to the 769-775 MHz and 799-805 MHz segments of the band. See 47 C.F.R. Section 90.531(b) of the Commission's rules. Prior to this reallocation, narrowband channels were located in the 764-767/773-776 MHz and 794-797/803-806 MHz segments. Thus, as of August 30, 2007, all new or modified 700 MHz narrowband operations by public safety licensees must be conducted according to the new band plan unless that licensee was granted waiver relief by the Commission. Further, any such waiver relief was specifically limited to reported equipment that was already on order and planned for deployment. Accordingly, no new equipment may be marketed to public safety licensees unless it is licensed and operated in compliance with the current band plan.

b) [2.962(c)(5), 2.962(f)(1)] FCC-TCB conference call notes Aug 2010 (rev 1 minutes updated 09/01/2010): Additional info: for Upper-700 band, application filings and grants need to distinguish between and test accordingly (KDB pub. 634817) for US Non-Federal narrowband and broadband 90-R sub-blocks 763-768 MHz, PS broadband 768-769 MHz, PS internal guardband 769-775 MHz, PS narrowband voice 793-798 MHz, PS broadband 798-799 MHz, PS internal guardband 799-805 MHz, PS narrowband voice

c) please revise filing accordingly to address compliance with preceding policy items.

Response: The grant has been conditioned with the EF not code and a cover letter has been provided.

3) User manual (albeit draft) shows "limited keypad" and "DTMF keypad" versions, however this filing seems unclear whether or not it is intended to cover one or both keypad versions. At present it appears that only one keypad version was tested. In general each keypad version needs to be treated as and tested as different versions with respect to the procedures of KDB pub 447498 D01 v04 item 6) and along with KDB pub 643646. In case test reductions for the two keypad versions might be appropriate and would be requested, such test reductions must be submitted for consideration and agreed to by FCC via a pre-TCB KDB inquiry BEFORE completing testing.

Response: The limited keypad option has been removed from the filing. See pdf pages 22 and 27 of the user manual.

4) Per 2.1033, when it becomes available please ensure that final operating instructions to be provided to end-users gets submitted into this FCC ID record.

Response: The final version of the user manual will be uploaded to the filing when it becomes available.

5) Typically for devices with held-near-face PTT mode as well as body-worn with accessories we have asked TCBs to use eqpt. class TNF not TNT; please revise where appropriate, for this and all future filings for similar devices.

Response: The equipment class has been change to TNF.

6) To support SAR evaluation positions and results, please provide other photos for speaker-mic with antenna showing closer-in views of backside and belt-clip; please also show typical intended and/or reasonably expected end-use configurations for this accessory type as when worn on a user's body.

Response: Close up photos have been provided. See pages 129 to 133 of the SAR report.

7) TCB please notify SAR lab to revise for disambiguation for citations such as that at SAR pg 16 of 180 "KDB 643646 section 1) A) I) a)" - for this and all future filings citations to 643646 need to also list KDB pub version number and page number(s) - i.e. for this example it appears the reference is 643646 D01 v01r01 page 2 section 1) A) I) a)

Response: The SAR lab has been notified. KDB versions have been added on pages 1, 12, 13, 15 to 19 of the SAR report.

8) SAR pg 17 of 180 mentions "KDB 643646 section 1) A) I) a)" - please revise to clarify KDB version number and page number for that citation.

Response: KDB versions have been added to page 17 of the SAR report.

9) Assuming the citation mentioned in above 8) is for 643646 D01 v01r01 page 5 section 1) A) I) a), that is applicable for the first eight data rows of SAR pg 17, however the rest of that table needs to apply procedures pp 7 to 9 of 643646 D01 v01r01, i.e. "Body SAR Test Considerations for Audio Accessories with Integral Antenna" It seems unclear whether and how the data at hand is in accordance with channels selected, etc. therefore may not qualify for TCB filing. See also the channels and combinations summary matrix sent via reply in associated TCB KDB inquiry, for which without proper justification in the SAR report then ALL cells under all freq. columns for a full combinations table would be expected to be populated with test data. TCB please arrange for revise accordingly where appropriate.

Response: The channel selection process has been explained on page 15 of the SAR report. The SAR measurement reduction has been explained on pages 16 to 18 of the SAR report.