



Date: 13<sup>th</sup> December 2006

Gregory Czumak  
PCTEST Engineering Laboratory, Inc.  
6660-B Dobbin Road  
Columbia, MD 21045

Re: Correspondence Number AZ40782 with FCC ID: AZ489FT7028.  
Confirmation Number: 12010782-83

Dear Mr. Czumak;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 7<sup>th</sup> December 2006 request for information in Correspondence Number AZ40782.

1: Please address the following 4 requirements for frequency hopping spread spectrum transmitters (Bluetooth) from Section 15.247(a)(1):

- a. Is the hopping sequence pseudorandom? **Yes**
- b. Are all channels used equally on average? **Yes**
- c. Does the receiver input bandwidth approximately equal the transmit bandwidth? **Yes**
- d. Does the receiver hop in sequence with the transmit signal? **Yes**

2: Please address Sections 15.247(g) and (h) for the Bluetooth transmitter. **BT radio for HC700G has been certified by Bluetooth Qualification Lab. Please see the attached approval.**

15.247(g): In accordance with the Bluetooth Industry Standard, the system is designed to comply with all of the regulations in Section 15.247 when the transmitter is presented with a continuous data (or information) stream. **We comply.**

15.247(h): In accordance with the Bluetooth Industry Standard, the system does not coordinate its channel selection/hopping sequence with other frequency hopping systems for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters.

**We comply. BT and WLAN radios are hopping independently and randomly.**

3. Please submit data for radiated emissions in the Restricted Bands for both the Bluetooth and WLAN transmitters on their mid channels (only hi and low channel data was included in the test report).

**See Public Notice DA 00-705: "Band-edge compliance: capture the peak level of the emission operating on the channel closest to the**

**band edge, as well as any modulation product...etc" in other words, operating on highest and lowest frequencies only, as presented in the test report-Ex6.**

4. Is the Bluetooth capable of EDR mode? If so, please submit 20 dBc bandwidth and bandedge plots in this mode.  
**The plots submitted are for this mode, the only mode of operation.**
5. The RFx Exhibit references a belt holster (model FTN6839A). Does this holster provide at least 2.5 cm of spacing from the body? If it does not, then, in accordance with the 2002 TCB Exclusion List and based on the output power of the WLAN transmitter, SAR must be tested in order for a TCB to issue the grant of certification. Therefore, if the referenced holster does not provide at least 2.5 cm of spacing from the body, please either submit a full SAR test report, or else inform us if you will be filing this application with the FCC.

**We are confirming that the Holster is 3 cm from the body. See attached drawing of the Holster.**

6. We note that Qualitech is listed on the A2LA website as being accredited to ISO/IEC 17025 for calibration only. Please submit documentation showing that Qualitech has also been accredited to ISO/IEC 17025 as a test lab (the accreditation number on their A2LA logo does not match that shown on the A2LA website).

**See A2IA Certificate # 1633-01.**

7. FYI: please note that, if the body worn holster does provide at least 2.5 cm of spacing from the body, then we will not be uploading the SAR Assessment Exhibit to the FCC, since (a) SAR testing would not be required (see question #5), and (b) the FCC does not permit TCB's to evaluate SAR computations (measurements only).

Contact me at (954) 723-5793 if you require any additional information.

Sincerely,  
*/s/ Mike Ramnath (signed)*  
Manager, Regulatory Compliance  
Email: [Mike.Ramnath@motorola.com](mailto:Mike.Ramnath@motorola.com)