

Submitted herewith, on behalf of our customer is an amendment to the subject application, provided in response to your request for explanation dated November 20, 2002:

1. Request: Use of the device

Answer:

It is a misunderstanding by FCC.

It is not intended and there is no opportunity to clip directly the BT200A to back or somewhere else of any phone.

For this reason there is not any conflict with restrictions on mobile phone grants concerning to body-worn operating configurations (use of specific belt-clips, holsters or similar accessories).

2. Request: Co-located transmission environment

Answer:

In case co-located transmission environment is applicable for this filing, RF Exposure compliance can be assumed without additional measurements also.

Please consider following conditions:

Both transmitters, BT200A and mobile phone are not contained in same host equipment.

The BT200A and the mobile phone have no direct contact. There is a minimum separation distance between both devices and its antennas when operated in body-worn configuration.

The power output of BT200A is quite low, 1.5 mW.

For use in another type approval for BT200A, the device was tested for SAR.

Maximum SAR is 0.0056 mW/g according to test report. This is about factor 280 ! below the limit.

Typical SAR values from part 22 & 24 mobile phone are noticeable below the limit when operated in body-worn configuration.

Although SAR in co-located transmission environment is a complex phenomenon it cannot be assumed that there is any non-compliance of RF exposure requirements if all of the above mentioned will be considered.

Furthermore it must be heeded that when SAR evaluation with a dominant transmitter (mobile phone) should be done, tissue simulating liquid parameters for e.g. 1900 MHz must be used.

In this case there is a measurement uncertainty of SAR component from BT200A which operates in the 2400 MHz band, which can be assumed to be higher then the SAR value produced by the 1.5 mW output power.

All the above noted, it is our opinion that additional SAR measurements bring no more significant knowledge in respect for this evaluation.

3. Request: Spacing from phone to body

Answer:

Because BT200A is not installed directly to the phone there is no change in body-worn operating conditions of the phone.

The BT200A doesn't have any influence on spacing from phone to body.

If there is any further request, please inform us.

Sincerely,

Jürgen Baschin