



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

October 20, 2005

RE: FCC ID: C9SDTA01TP400GSB_ATCB002871
Attention: Naoki Sakamoto / Hisayuki Kioka

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that there is no evidence in the SAR report that you turned the BT transmitter on during the highest SAR level. Please note that it is a requirement that with collocated transmitter where the dominant transmitter is required to have SAR evaluation that the non-dominant transmitter (the BT) is turned on during the highest SAR measurement in order to determine how the less dominant transmitter affects SAR. Please note that the less dominant transmitter is not allowed to affect SAR by more than 20% of that produced by the dominant transmitter. Please provide the measurement data for the configuration where the WLAN and BT transmitters are both turned on at the same time in the highest SAR configuration. Alternately, please provide evidence as to how simultaneous transmission is not possible.
2. Please note that as testing for body worn configuration was done without accessories, the manual needs to address the fact that SAR is only applicable for body worn accessories that do not contain metal. It is also generally accepted that the highest level SAR measured is place in the manual. Please note that as the device was tested in touch position, the separation distance does not need to be in the manual. Please correct the manual to address body worn accessories that do not contain metal and please include the highest Body SAR value in the manual. Please review the recommended wording for body worn accessories in OET65c and IEEE1528 and apply accordingly.

Dennis Ward
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.