

Assessment Notes by BABT as TCB for a Class II Permissive Change to the Symbol Technologies Inc H9P2164381.

For Symbol Technologies Inc. under FCC ID number H9P2164381

BABT file number US/000070

I have reviewed the TÜV-PS SAR test report WS611522-001 issue 001 in respect of the above product in conjunction with the original RF test report OR611522/02 Issue 3 and the latest RF Test report OR612327/02 Issue 1 and I have the following comments:

The expanded measurement uncertainty is shown on page 11 of the SAR report at 20.57%, which is acceptable for this kind of measurement. The head and body simulant fluids were correctly calibrated within 5% of the target values and the measurements were taken within 100MHz of the calibrated frequency of the fluids.

Important note to FCC reviewer:

The device is a Bluetooth™ module for use in a portable computer intended to be normally hand-held and used for data entry applications. A new power amplifier has been introduced.

The worst-case SAR value for normal General Population uncontrolled exposure use in an appropriate hand-held computer are summarised below.

Summary of highest measured SAR Values

| Band | Position | Channel | Frequency (MHz) | Max Spot SAR (W/kg) | 1g SAR (W/kg) | SAR drift dB | Area Scan (Figure #) |
|--|---|---------|-----------------|---------------------|---------------|--------------|----------------------|
| Bluetooth™ | MC9060 placed 1.0cm from phantom 2.0mm side | 39 | 2441 | 0.410 | 0.317 | -0.148 | Figure 22 |
| Limit for General Population (uncontrolled exposure) 1.6 W/kg (1g) | | | | | | | |

Peak EIRP

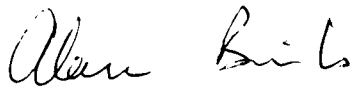
| Band | Report | Channel | Frequency (MHz) | Output Power (dBm) | Output Power (mW) |
|------------|----------|---------|-----------------|--------------------|-------------------|
| Bluetooth™ | Previous | 39 | 2441.0 | 17.30 | 53.7 |
| Bluetooth™ | New | 0 | 2402.0 | 15.86 | 38.55 |

Justification:

The new power amplifier does not provide a higher output power and so the original SAR report does not need to be repeated. Although the peak power occurs at a different frequency to the original report the measured SAR value is not expected to change significantly with measurement error.

It is viewed that this device **DOES MEET** the SAR requirements with the new power amplifier and that no further SAR test work needs to be performed

I confirm that I have undergone SAR awareness training by the FCC at the TCB Council workshops in August 2001, February 2002, April 2002, October 2002 and May 2004.

A handwritten signature in black ink that reads 'Alan Binks'.

Alan Binks
Certification Manager, BABT
23rd August 2004