



Date: 10 May 2011

Mr. Bruno Clavier
TIMCO Engineering, Inc.
TCB, FCC and Industry Canada Approvals
849 NW State Road 45
Newberry, FL 32669

Re: KDB Inquiry Number: 578787
TIMCO Job Number: 2706UC10 (Part 22/24) Filing.

Dear Mr. Harrington,

Motorola Mobility, Inc., 8000 W. Sunrise Blvd, Suite A; Plantation, FL herein submits its response to the FCC's 4 May 2011 request for further information on FCC ID: IHDP56LS1, as referenced above.

In general, FCC requests that SAR exhibit(s) be updated for clarifications and supporting info similarly as has been requested for FCC ID: IHDP56LS2, and also per the following. The following remarks are based on IHDP56LS1 SAR report "Rev A" (also considering IHDP56LS2 SAR report "Rev B").

- Q 1. Please provide additional 1-g SAR tests for Mobile Hotspot mode to demonstrate power reduction levels as follows. So as to supplement the existing hotspot SAR results, please use the same test sample:
- a) Ch 9262 (Low Ch), 10-mm from bottom edge, power reduction disabled (companion to pg 29 of 33 power-reduction result, 1st table).
 - b) Ch 9538 (High Ch), 10-mm from back surface, power reduction disabled (companion to pg 32 of 33 power-reduction result, 1st table).
 - c) Ch 9400 (Mid Ch), 10-mm choose either back surface or bottom edge, power reduction disabled.

These tests are to be included as a separate document to supplement the SAR report. Please include sufficient explanation in the supplemental write -up to suffice as a stand-alone document. Please clearly explain that test results are for purposes only of demonstrating power reduction, and are not applicable for evaluating compliance.

Response:

The Supplemental SAR report submitted herewith addresses these requirements.

Q 2. N/A.

Response:

None required.

Q 3a. for this and ALL future filings from ALL applicants TCB please ensure to enforce the following:

- i. The maximum output power rating for a device [2.1033(c)(7); 2.1033(b)(6)] is reported in power quantities as defined in the applicable basic or service rules, i.e., conducted, ERP, EIRP. Rated power generally means the not-to-exceed level for a device.
- ii. Output power listed on a grant is based on measurement results, and must be consistent across all parts of filing, e.g., test report(s), operational description, operating instructions, etc. To ensure compliance with FCC rules, device should be configured for maximum output power when tested.
- iii. All production units marketed by grantee must conform to the pertinent technical requirements and to the representations made in the original application [2.927(b), 2.939(2)], within variation that can be expected due to quantity production and testing on a statistical basis [2.931, 2.907(b), 2.908].

Response:

Motorola will continue as indicated. Per FCC KDB requirements, the device was commanded to transmit the maximum power level and duty cycles for the part 15 conducted power measurements and SAR tests presented in the associated test reports. The SAR report has been modified to clarify that the maximum power allowed is in line with the measured power.

Q3b. for this specific device, FYI note that any devices marketed that transmit under part 15 with source-based timed-averaged conducted output power at higher than the measured results in this filing are noncompliance equipment.

Consequently, TCB please coordinate revision with applicant and confirm via TCB review so that all relevant exhibits and f-731 line entries unambiguously identify part 15 rated power and as supported by measurements; e.g. SAR pg 5 of 33 cannot list 802.11bgn 20 dBm, 802.11an 13 dBm, BT 10 dBm unless all SAR and EMC/radio-parameters are measured at those levels (or if measured at lower level then all SAR results, simul.-transmit analyses, etc must be scaled up where appropriate / applicable).

Response:

The SAR and EMC reports, as well as the Operational Description exhibit, have consistent power measurements. Motorola will work with the TCB to update the 731 form as needed.

Q3c. related also to 3) a) and 3) b), for the Operational Description exhibit and SAR report, please identify any path losses for applicable frequency bands. Include range of power variations to support measured Wi-Fi output.

Response:

The measured conducted power values presented in the test reports are taken at the input of the transmit antenna match. Since the device was commanded to transmit at the highest power levels during testing, these values represent the maximum capabilities of the measured device. As described in the Operational Description, this device supports power control techniques, and is therefore is capable of transmitting at lower levels under prescribed circumstances. However, the device was forced to maximum power during all testing.

Q 4. N/A.

Response:

None required.

Q 5a. Identify Wi-Fi power as either peak or average in Section 2.4 of the SAR report, AND FOR ALL FUTURE FILINGS.

Response:

Section 2.4 of the SAR report now indicates that power measurements are average conducted power.

Q 5b. For WLAN SAR results tables, please include column showing corresponding output powers.

Response:

The requested column of data has been added to the SAR report.

Q 6a. As mentioned during the 5/3/11 conference call, if possible, include column listing power reduction target levels in SAR results tables.

Response:

These data have been included in the Supplemental SAR report.

Q 6b. PCE part of this fccid includes an exhibit type "6 Test Report" (emc/radio) filename entitled "TX Power Reduction"

for this fccid IHDP56LS1, in SAR report please include table similar to first table on pg 6 of 34 of IHDP56LS2 SAR Rev B, i.e. summarizing power reduction levels across the band (not just limited discrete channels).

Response:

The requested table has been added to the amended SAR report.

Q 7. For Lapdock with handset in place, please submit photos or drawings with callouts to indicate antenna locations and user separation distances).

Response:

The requested information is submitted herewith as Exhibit 7D (Lapdock Supplement).

Q 8. NA.

Response:

None required.

Q 9. NA.

Response:

None required.

Q 10. TCB and grantee please carefully proof-read SAR report for inconsistencies, and revise if / where appropriate for example, in all tables and text please clearly distinguish between body hotspot mode tests and body-worn accessories tests.

Response:

Motorola, as part of its continuous improvement culture, will step up its quality control procedures for these filings.

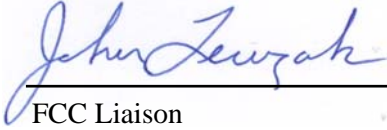
Q 11. FYI-only this time: several part-22/24 measured levels are at higher than tune-up target max. levels. For ALL future filings, please test only within tune-up tolerance range.

Response:

Understood.

If you have any questions, please contact me at (954) 723-6272, or via e-mail, per below.

Regards,



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