

Date: 9 February 2007

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

Re: Job Number: 317UC7 (Part 24E) Filing, with FCC ID: IHDT56GP1.

Dear Mr. Clavier,

Motorola Inc., 600 North US Hwy 45, Libertyville, IL, herein submits its response to your 6 February 2007 request for further information on FCC ID: IHDT56GP1, in relation to Job Number 317UC7.

Q 1. Part 24 test report – page 10/23 PDF: Section 1 refers to “ERP” based on the equation provided and Section 2 reports EIRP. Please explain or revise.

Response:

Measurements were all made EIRP. This typographical error has been corrected in the revised, attached report (*T56GP1_Ex_06a_(Part 24 CDMA)_Rev_A.pdf*).

Q 2. Part 24 test report – page 10/23 PDF: Was the substitution method used to derive the EIRP? If so, please specify on this page. The FCC requires substitution method for licensed devices as prescribed in TIA 603-C section 2.2.17. FYI - calculations from the measured field strength data is OK for Part 15 only).

Response:

Yes, the procedures of TIA 603-C are used for all licensed devices. This has now been referenced on this page of the revised report.

Q 3. Part 24 test report – page 12/23 PDF: The levels reported in the “dBc” column appear to be in error. Also, please revise the calculated margin which does not appear to compute with the two previous columns and limit (i.e. limit absolute value is -13 dBm or relative 43+10LOG Pwatt). Please revise.

Response:

This error has been corrected in the revised, report (*T56GP1_Ex_06a_(Part 24 CDMA)_Rev_A.pdf*).

Q 4. Part 24 test report – page 16/23 PDF: Measured levels should be expressed in the same unit as the fundamental emission, which should be EIRP for Part 24. Please revise.

Response:

This has been corrected in the revised report, attached.

Q 5. User's manual: Page 248 – it is written that this device has an HAC M and T rating. Please explain compliance with the HAC requirements.

Response:

Motorola intends this product to be HAC compliant, and will submit a Class II Permissive Change prior to placing this product on the market. The testing to support this application is currently in process.

Q 6. Part 24.238(b): Band-edge compliance is missing. Please provide data showing compliance at the band-edges (i.e. in the 1 MHz band adjacent to the frequency blocks).

Response:

Two additional plots were taken at the lower and higher edge of the frequency block to demonstrate compliance with the band-edge requirements. Please refer to the revised report.

Q 7. Part 2.1055(d)(2) requires that the frequency stability shall be measured with variation of primary supply voltage as follows: "For hand carried, battery powered equipment, reduce primary supply voltage to the battery operating end point which shall be specified by the manufacturer." This test is missing. Please revise test report.

Response:

This test was performed and is now included in the revised test report.

Q 8. SAR Report – Co-transmission: No data was found showing compliance with the limit when the Bluetooth device operates simultaneously with MT, iDEN, or CDMA operating modes. Normally, the Bluetooth device is turned ON while testing other modes to determine worst-case SAR value(s). Please explain or revise accordingly.

Response:

Normally Bluetooth is enabled while testing other applicable modes/technologies. However, the DUT test software did not support simultaneous transmission and therefore the DUT was tested with Bluetooth in the “stand alone” transmitter mode, and the maximum recorded SAR was added directly to that determined for the other transmitter modes. This alternative method is a highly conservative approach since the highest RF peak areas (hot spots) of both modes/technologies would not typically overlap. The table below illustrates the highest maximum calculated SAR data at the body for Bluetooth, MOTOtalk, CDMA, and iDEN along with their summed results. These data are consistent with the final reported Maximum Calculated SAR at the body shown in section 10.0 of the SAR report (i.e. 1.41 mW/g).

Maximum Calculated SAR (mW/g)		
	1-g average	10-g average
MOTOtalk (Part 15)	1.408	1.012
Bluetooth (Part 15)	0.004	0.002
Sum	1.412	1.014
CDMA (Part 24)	0.762	0.471
Bluetooth (Part 15)	0.004	0.002
Sum	0.766	0.473
iDEN (Part 90)	0.148	0.110
Bluetooth (Part 15)	0.004	0.002
Sum	0.152	0.112

If you have any questions, please contact me at (847) 523-6167, or John Lewczak at (954) 723-6272.

Sincerely,

Andrew J. Bachler (signed)

FCC Liaison
Motorola Mobile Devices Business
Email: A.Bachler@motorola.com