Greg Vaught Motorola Inc

Confidential FCC Cover Letter Re. Comments on Test Report Exhibit:

We realize this device is a new version of a previously certified transmitter. Since the RF section was not changed we are accepting the RF conducted data from the previous submittal, along with your new data for the radiated tests. The Test Report Exhibit and data were accepted based on the following:

- Radiated Measurements: FCC has recently stressed that the "substitution method", detailed in TIA-603, be used to measure radiated emissions from licensed transmitters. We will accept your data, which is based on a calculated power level rather than the substitution method, since FCC had accepted similar data in your previous submittals. We are confident that this device is compliant since the emission levels are well below the required limit. Please use the substitution method in the future. Also, please note that the FCC limits are based on the power level radiated from a dipole antenna and not isotropic. In the future, please indicate the measurement bandwidths used for all measurements.
- 2. Spurious and Harmonic Emissions Conducted Measurements: These measurements should have been performed using a 30 kHz bandwidth instead of a 30 Hz bandwidth. Again we are accepting this data since the FCC had accepted it in your previous submitted (1999). In order to compare your data to the FCC Limits, we applied a BW correction factor of 30 dB (10log (30kHz/30Hz) to the data. With this correction, your emission levels remained below the -13dBm limit. Please use the proper BW in future submittals.
- 3. Occupied BW: In the future, please apply the proper emission mask to the plots to simplify evaluating the data. We evaluated the data against the TIA IS-97 mask.

We welcome any questions or comments. Please froward your question to me.

Sincerely,

Raymond Klouda Senior Engineer Elite Electronic Engineering Inc.

cc. FCC