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

November 4, 2002

RE: Agere Systems Nederland BV

FCC ID: IMRPC2411B

After a review of the submitted information, I have a few comments on the above referenced Application.

EMC Report

1) The EMC report states that the highest output power is 16.2 dBm (41.7 mW output). The 731 form provided listed 32 mW and the operational description provided states < 32 mW. Please note that all exhibits provided (731, test report, etc. should provide consistent numbers for the power of the device). Please explain and provide corrected exhibits as necessary. (ALSO SEE ISSUE 4 BELOW)
2) For compliance testing of the radio, this device was tested attached to a stand-alone laptop. However, the device is also considered as a PC Peripheral device and is subject to either a certification or DoC for these emissions. For this test the device must be configured as part of a minimum configuration (including a PC + 2 additional I/O connections) as specified by ANSI C63.4. Please explain whether the device is to be subject to a DoC or certification for the PC peripheral requirements. If the device is subject to a DoC, then please that the EUT has been properly configured as part of a fully configured system for its DoC authorization. Please note that the device does not contain DoC labeling information or a statement of compliance (2.1077) as required.

SAR Report

3) The Test report should reference the FCC ID of the unit, identify the device category ad mobile or portable, and whether the device is subject to Occupational/Controlled or General Population/Uncontrolled limits.
4) The peak power measured by the SAR facility must agree closely with the EMC report, but also be greater than or equal to the EMC result. The power measured in the SAR report page 18 of 47 was about 4 dB higher than the EMC facility. Note that conducted powers are expected to be +/- 0.5 dB from each other. Please explain.
5) The measurement system should include more detail regarding handset holders, surroundings, absorber, noise floor, etc.
6) The test procedure should explain the positioning procedures used to evaluate the highest exposure expected under normal operating configurations.
7) All SAR plots are required to include actual test date(s), ambient temperature, liquid temperature, and channel frequencies.
8) Four positions were tested and four plots provided. However 2 plots were identical. Please provide the missing plot.
9) A copy of the z-axis scan is required at the maximum SAR location.
10) Please provide a brief description of the reference source used to verify the SAR system performance. Additionally, information regarding the forward power into this should have been provided.
11) System performance verifications must be performed the same day and for each day testing is performed. This does not appear to have been done.
12) The tissue parameters for the system validation appear to be outside the 10% tolerance window. Validation outside of the window suggest problems with the system and should be corrected before proceeding.
13) Calibration and manufacturer information regarding the verification dipole must be provided.
14) Please include a description of the body phantoms used in the tests, including shell thickness and other tolerances.

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15) Please justify Crest Factor of 8. Please note that direct sequence is typically expected to be a crest factor of 1. Please note that the test report stated the device was in a permanent transmission mode. Please provide updated or corrected SAR plots if necessary.
16) Calibration information as specified in Annex 4 was not provided. Please provide this.
17) Please provide a description of the probe, including tip diameter, internal sensor offset from tip, etc., a description of the probe measurement errors included, a description of probe calibration errors/uncertainties, most recent calibration date, and calibration certificate showing all factors used in report.
18) The justification regarding testing the center channel only on page 17 of 47 is now considered by the FCC to be 3 dB, not 2 dB. Please correct.
19) Many pieces of test equipment (section 2.4.5) appear to be beyond a typical 1 year calibration cycle. Please explain.
20) FYI, page 9 of 47 referenced plots in Annex 1. Shouldn't this state Annex 2?

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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.