



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

December 6, 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.

SAR Report

- 1) Page 5 of the test report states that channel 1 is 2409 MHz. Shouldn't this be reported as 2412 MHz according to the operational description?
- 2) The tissue simulating parameters should be measured the same day at the testing is performed, which according to your response was done the same day. However, the measured date given in the test report appears over a month from when the SAR measurements were taken. Additionally the tissue temperature must stay with +/- 2 degrees C during the test AND from when the parameters were measured. According to section 2.4.11, the tissue parameters were measured at 22 degrees C, while some SAR measurements were made with tissue parameters at < 20 degrees C. Note that changes in environmental conditions, humidity, evaporation, etc. can affect the results. There is also concern that the 2.45 GHz mixture may be more susceptible to changes in temperature than the other mixtures. Also, the measured Body Tissue parameters at midband 2450 MHz must be within 5% of the target value. The test report shows almost a 10% conductivity value. Additionally the 10% tolerance allowed applies only to the dielectric constant and not conductivity.

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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.