M. Flom Associates, Inc. - Global Compliance Center
3356 North San Marcos Place, Suite 107, Chandler, Arizona 85225-7176
www.mflom.com general@mflom.com (480) 926-3100, FAX: 926-3598

Federal Communications Commission
Attention: Steve Dayhoff
Date: September 5, 200l
Applicant: VERTEX STANDARD CO. LTD.
Equipment: FCC ID; K66VX-210U EA101563
Correspondence: 20493

Steve:

Just returned from the T.C.B/S.A.R. Workshop in Washington and hasten to reply to your correspondence, i.e.

Item l. As you say, the SAR testing by the SAR lab was performed with the device operating @ 4-6 watts conducted R F Power as measured by the SAR lab. The EMI Report shows maximum R.F. Power as 5.06 watts, conducted, as measured by the Applicant. After doing the math, it appears that the Applicant's results are 0.387db higher than that measured by the SAR lab.

It was my understanding that this was of positive significance, considering that the Applicant's measurements were performed by their lab in Japan and the SAR lab is here. And, considering the question of uncertainties (to ISO 17025) WHICH, I BELIEVE, HAS NOT BEEN RESOLVED YET by the committee, I considered this very interesting. My question to you is: does the Commission want to see that the R.F.Power Output to be exactly equal or what is the allowance?

Item 2. Headset jack for hands-free use: The FCC is requesting body-worn SAR DATA. This question has been referred to the Applicant and we await their reply.

Item 3. Radiation exposure conditions in Manual. This will be replied to by the Applicant through us.

Hope this answers your questions. Regards, Mort Flom