CGISS EME response to TCB correspondence dated 5/8/03 from Roland Gubisch of ITS 5/9/03

Q1. This probe calibration data is absent:
- axial, hemispherical isotropy plots
- dynamic range and linearity plot

Please provide this information, or indicate how compliance with requirements is documented. A copy of the SPEAG calibration plots is acceptable.

R1. Attached herein are the requested additional SPEAG calibration plots.

Q2. This SAR computation is absent:
- coarse scanning procedures used to locate peak SAR
- interpolation procedures used to identify peak SAR
- fine scanning procedures used to determine peak 1-g SAR
- integration procedures used to determine highest 1-g and 10-g SAR in cube

Please provide this information, as supplementary documentation.

R2. The system used to assess compliance performance of FCC ID: K7GT59XX was a DASY 3 system. This is a generally accepted industry standard system. The information being requested can be located in the application notes section of the DASY 3 Dosimetric Assessment System Software Manual. Specifically reference "The application note: Data Storage and Evaluation" as well as "Application Note: Validation and System Check" sections. A PDF file containing the relevant sections of the application notes are attached herein.

Q3. Please indicate how the minimum 15 cm liquid depth in the flat phantom was assessed and assured.

R3. All CGISS EME phantoms are marked with a 15cm reference line. The liquid depth is referenced to this line during each daily system performance check and adjustments are made as needed.

Q4. Please indicate which accessories if any are metallic.

R4. The following accessories contain metallic material:

- Model NTN9392B - Swivel Belt Clip - internal spring is metal.
- Model NTN9153A - FR50 carry case - metallic material in the area of the antenna loop
- 50982 - Fanny Pack - metallic zippers
- All audio accessories contain metallic contents.

Q5. Section 8 of the test report lists the highest face-held SAR values calculated as 0.92(1-g) and 0.63 (10-g). The table in Section 7.1 lists SAR values of 1.10 (1-g) and 0.753 (10-g). Please explain the differences.

R5. Please reference the table labeled “Compliance Assessment at the Face; CW mode” in section 7.1 on page 17 of 17. This table shows the maximum calculated results that correspond to the results reported in section 8.0 on page 17 of 17. Note that the 2.5cm assessment reported in the “Compliance Assessment at the abdomen...” used FCC body tissue parameters while the results in the “Compliance Assessment at the Face…” used IEEE head tissue parameters. Also note that the test position information indicated in the “Compliance Assessment at the Face…” results incorrectly shows “against the phantom”. The correct test position is with 2.5 cm separation distance. The revised report attached herein reflects this correction.

Q6. A source-based, time-averaged duty cycle of 50% for SAR calculation is allowed for push-to-talk transmitters. Your calculations do not appear to include this factor, based on a CW test signal. Please explain why a 50% factor does not apply for this device. If it does apply, you should re-compute the maximum SAR values accordingly. The reported 1-g value of 1.55 is marginal to the limit of 1.6 W/g.

R6. A 50% duty cycle is applicable to this product. The maximum calculated results presented in the submitted report reflect 50% duty cycle performance. The equation presented in section 7.3 should have accounted for the 50% duty cycle. The report has been revised to correct this error. Please find the revised report attached herein.