



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

August 5, 2004

RE: FCC ID: L6ARAQ40GW\_ATCB001535

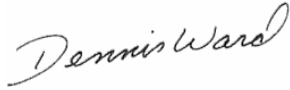
Attention: Masud Attayi

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

FCC

1. Please note that the highest measured conducted power listed on page 4 of the SAR report is less than the maximum conducted power listed on page 30 of the EMC report. As you are aware, when there is a difference in power between the SAR and EMC reports, that difference cannot be more than 5% and the higher power must be that reported in the SAR report. If this is not the case, then some explanation must be provided as to why the SAR report is not the higher. One explanation might be that while the same device was used in both testing configurations, the measurement instrument error between the two labs has caused the difference. This would be acceptable as both tests were done with the same device. An unacceptable explanation would be that the SAR was not done with a fully charged battery and thus not at the full measured power. Please note that the variation in power between that reported in the SAR report and that reported in the EMC report is 0.3dBm (approx 7%). Please explain why the conducted power listed in the SAR report is almost 75 less than that in the EMC report. Alternately, please provide SAR data where power is greater or equal to that in the EMC report.
  2. FYI - Please note that the statement, "Using any accessories not approved by RIM for use with this particular handheld model will invalidate any approval " located on page 4 of the safety info document is not accurate. The use of accessories may cause non-compliance issues and may void or invalidate approval, but it is not mandatorily a 'will invalidate approval' situation. Please be accurate when referring to FCC approval situations.
  3. Please note that the SAR report states that a 13mm separation distance exists when using the holster. Please note that this 15mm separation distance will be on the grant and needs to be in the safety document as well. Please consider placing this body worn safe distance in the manual.
  4. Please note that it is not clear from the SAR report or the manual if any of the accessories contain metal. IF these items do not contain metal, then the separation distance mentioned in item 3 and the fact that accessories must contain no metal is needed to be in the manual. Please either place this information in the manual or please show where this information is in the manual and SAR report.
  5. Please note that the FCC has stated and requires that separate setup photos are to be provided for part 15 devices. Please provide a separate test setup photo exhibit for the part 15 Bluetooth testing.
  6. Please note that the test report for the Bluetooth radiated emissions is unclear. On page 23 of the Bluetooth report you indicate that antenna substitution methods were used. Please note that, especially in the restricted frequency bands, radiated emissions are a field strength only measurement and are not done using antenna substitution. Please also note that the limit used is 74dB and yet it is not clear if the 54dBuV/m average limit has been met. Please note that there are two limits that must be considered. The device must meet the average 54dbuV/m limit above 1GHz and it must meet the 74dBuV/m limit for peak readings. Please clarify the emissions recorded for radiated emissions measurements and please provided evidence that the device meets both limits for part 15 devices.
- Industry Canada
7. Please note that the part 15 device needs to be listed as a Bluetooth Device in the equipment field on the RSP100 document instead of a "Spread Spectrum Device (2400-2483.5MHz). Please correct this equipment listing.

8. Please note that as you have three equipment types you will need to address the power for each device. Please put the min and max powers for all three devices in the power field on the RSP100.
9. Please note that as you have three equipment types in this application, you will need to provide the emissions designators and bandwidths for all devices. While the 250KGXW will work for the Cell and PCS bands, you will still need to provide the bandwidth and emissions designator for the Bluetooth device. Please provide this information for the Bluetooth device.
10. Please note that cell and PCS devices such as this usually have stepped power functions. Please provide this information on the RSP100 form.
- 11.



Dennis Ward  
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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.