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January 9, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Mr. Martin Perrine

SUBJECT: **Standard Telecom Co., Ltd.**
FCC ID: MBUNCP7100
731 Confirmation No.: EA102542
Correspondence Reference No.: 21550
Request for Tech. Info.: 12/21/01

Dear Martin:

Transmitted herewith, on behalf of **Standard Telecom Co., Ltd.** is an amendment provided in response to the request for technical information dated December 21, 2001.

1. We tested PCS body SAR using a conversion factor for 1900 MHz muscle which is 4.7.
2. In the case of brain SAR in the PCS band we used a recipe with a conductivity of 1.6 S/m instead of 1.4 S/m as specified in supplement C. Please note that the dielectric constant is within the 5% specified. In this case, the SAR value is directly proportional with the conductivity. The overestimation of SAR should be approximately 14%.

$$SAR = \sigma E^2 / \rho$$

Where:

σ = Conductivity of the tissue-simulant material (S/m)
ρ = Mass density of the tissue-simulant material (kg/m^3)
E = Total RMS electric field strength (V/m)

$$\frac{(1.6\ S/m - 1.4\ S/m)}{1.4\ S/m} \times 100 = 14.28\%$$

We trust this information is sufficient for the immediate grant of this application. If you have any further questions, please do not hesitate to contact us.

Randy Ortanez
President

cc: Standard Telecom Co., Ltd.