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To: Jim Turner  
From: Jay Moulton  
RE: TCB Comments on SAR Report

Item 2. The SAR plots for cellular GPRS (2TX) on pp. 49 and 53 apparently use a Crest Factor (duty cycle) of 1, and not 4. Please explain, re-calculating these SAR levels with C.F. = 4 if appropriate.

I have used the data in the SAR system computer to re-calculate the corrected value of the SAR with a crest factor (duty cycle) of 4. The data sheets would not be updated with the new value; therefore, in the report, the data sheet will still show the SAR value for a crest factor (duty cycle) of 1. The table on page 19 of 143 has been updated to show the re-calculated SAR value with a note indicating the above comment.

Item 3. In the calibration report for the E-020 SAR probe (cellular band), the tissue conductivity used in the test is more than 5% higher than the target value. The report lists a +/- 10% tolerance for this value, while listing a +/- 5% tolerance for the other tissue parameters (both cell and PCS bands). OET Supplement C requires a tolerance of 5% for this band. Please justify the use of the 10% tolerance. This can affect the probe conversion factor value subsequently used in the dipole validation and SAR tests.

The manufacturer of the probe was contacted, and their records indicated a different value than what was originally sent to our lab. The probe calibrator has sent a new calibration record, and the new revision of the report has the corrected values.

If you have any further questions, please let me know.