

20 October 2000

Mr. Errol Chang
FCC Application Processing Branch

Re: Question from the FCC

FCC ID: NBZNRM6833
Correspondence Reference Number: 16687
731 Confirmation Number EA98660
Date of Original E-Mail: 10/19/2000

Dear Mr. Chang:

Pursuant to your e-mail to APREL Laboratories' Jay Sarkar, I am forwarding to you our responses to item 1. The relevant portions of the FCC's e-mail follow with our response inserted in the appropriate place:

> 1. Two test configurations were used in the body-worn SAR
> evaluation, "Clip" and "Phone" parallel to the phantom. Please
> clarify or provide illustrations for these two test configurations.

> Sent: Thursday, October 19, 2000 10:23 AM
> To: Jayanta (Jay) Sarkar, jsarkar@aprel.com
APREL Laboratories
> From: Errol Chang, echang@fcc.gov
> FCC Application Processing Branch
> Re: FCC ID NBZNRM6833
> Applicant: Novatel Wireless Technologies Ltd
> Correspondence Reference Number: 16687
> 731 Confirmation Number: EA98660
> Date of Original E-Mail: 10/20/2000
>
> 1. The revised RF exposure statement in the manual differs
> from that submitted previously. We would, therefore, like
> you to confirm the following.

The originally submitted RF exposure statement was erroneously carried over from the previous filings for the similar products Minstrel III and Mintrel IV (FCC ID NBZNRM-6832). Those two had to be submitted as mobile products because they were re-using the FCC ID for a CDPD module that had a grant as a mobile device, thus the reference to a 20 cm separation. The device

now under consideration is seeking approval as a portable device and the SAR measurements show that the device meets the FCC's health and safety requirements at a standard separation distance of 4 cm (agreed to by the FCC and Novatel Wireless in a meeting in June 2000 and confirmed in follow up e-mail). The RF exposure statement was therefore corrected to reflect this.

I trust that the above will answer your inquiry. If not, feel free to contact me.

Regards,

Paul G. Cardinal, Ph.D.
Director, Laboratory Operations