

Here are answers/comments to your review.

1) Form 731 rated RF power - should be ERP, 0.263 W as shown in test report for both AMPS and TDMA modes

731 Form is corrected. New Form is attached

2) From 731 emissions designators

a) Please provide necessary bandwidth calculations $B_n = 2(M + DK)$ to justify selection of 40K0 and 30K0.

b) Most 22H grants include emission 40K0F1D (wideband data) for AMPS mode; consider adding with same ERP.

Calculation for F3E and F1D is included in the Part 22 report (page23). No calculation is done for TDMA.

3) Cannot locate information on DC power into final RF stages per 2.1033(c)(8); please provide.

The info is added (page 5 of the Part 22 report).

4) Cannot locate attestation to system interoperability for AMPS mode per OET-53, see 22.933.

The Statement is attached.

EMC REPORT

1) The Table under section 1.2 shows TDMA conducted power as 26.3 dBm. Test results under section 2.3, and plot 2.6, show 849 MHz power in TDMA mode as 26.6 dBm. Please comment on difference.

Table 1.2 (page 5) is corrected.

2) Plots 6.4 and 6.5 do not appear to indicate compliance with -26 dB attenuation at - 20 kHz for 22.917(b)-(c); plot resolution is marginal.

These two plots are replaced with new plots (pages 27 and 28).

3) It is not clear if spurious conducted emissions were measured at low power as well as high power. FCC guidance: "Tests to be done at one operating frequency at maximum power output - except for antenna terminals measurements to be done at both highest and lowest power output levels."

Additional tests were performed; new plots are in the report (plots 7.5.a - 7.5.d, pages 51-54, see also page 38)

4) For measurement of conducted output in base frequency range per 22.917(f), noise floor of plots is above -80 dBm requirement. Please indicate how requirement is met.

See plots 7.4.a, 7.4.b, 7.4.c., pages 55-57 and 38.

5) Report should indicate that accessory headset was attached during cabinet radiation measurement. The setup photos appear to confirm.

The require statement is added to test procedure (page 58).

SAR REPORT

1) User manual page 9 says: " Extend your antenna fully." SAR tests show only one antenna position. Please resolve difference.

The corrected User manual is attaced.

2) Section 19 of User manual refers to "up to 600 mW" maximum power. This does not agree with EMC report or SAR measurements.

The corrected User manual is attaced.

3) EMC conducted measurement of 26.6 dBm at 849 MHz TDMA is not replicated in SAR report; corresponding SAR report value at that frequency is 26.3 dBm. Conducted values in SAR report should be => values in EMC report.

Page 10 is corrected

4) Please indicate how ambient RF emissions were considered in SAR testing.

The sec "e" is added to the sec 2.4 (page 28).

5) Cannot find flat phantom physical parameters (size, shell thicknesses, bottom sag, tolerances) in test report.

Page 33 is corrected and Phantom certificate (Appendix C) is added. We could not get the "bottom sag" from manufacturer, only the certificate.

6) Was EUT tested in both orientations to flat phantom (keyboard facing, and away from, phantom? Please clarify.

Additional tests were performed, and the test date is in the report on page 32. and in appendix A (pages 73-75); page 9 is also corrected.

Thanks

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