

# ITS Intertek Testing Services ETL SEMKO

February 23, 2000

Federal Communications Commission  
Equipment Authorization Division  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

Attention: Mr. Frank Coperich

Reference: Tottori Sanyo FCC ID:NRNDMC200, Conf # EA95002, Ref # 12072

Dear Frank:

This in response to your letter of 2/11/00, Ref #12072 for Tottori Sanyo.

Item 1

Enclosed please find rescanned colored SAR plots.

Item 2

The two sets of wires are battery charge and headset battery charge which are placed on the phone to make the battery lasts longer. I tried both with charge and with no charge; it showed no difference on the SAR reading. The leather holster/belt-clip was not used during the test because it was difficult to mount the cell phone with the leather holster/belt-clip on the fixture and be at the same place after changing the battery. The leather holster/belt-clip is made of leather, plastic, and with only a small spring metal.

Item 3

After reviewing both plots for body-worn SAR and head SAR, it appears to me that the maximum peak of head SAR is at keypad location which has zero distance from head phantom. The antenna base from the head phantom which is 2.2 cm distance from head phantom has much low SAR reading. It has almost similar reading with the body-worn SAR. I think the distance is the main factor for the differences of body-worn SAR and head SAR.

Item 4

A copy of the revised user manual showing the FCC RF exposure compliance statement is also enclosed.

I hope these resolve the issues and this application be granted.

Thanks and regards,

*Xi-Ming Yang*  
Xi-Ming Yang  
Test Engineer

XY/gcl



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