

From: Martin Perrine [MPERRINE@fcc.gov]
Sent: Friday, November 22, 2002 11:30 AM
To: MKUO@CCSEMC.com
Cc: Rich Fabina; Tim Harrington; David.Woo@corp.palm.com
Subject: RE: Request for additional information

Dear Mike and David

I spoke to Tim and Kwok regarding their previous discussions with you. Per their guidance to you at the time I will not be requesting zero gap data in this case. Please refer to this email as you respond to the RT that I sent.

Very best regards

Martin Perrine

>>> David Woo 11/21/02 11:38AM >>>
Dear Martin:

I would have applied much earlier after finishing Tungsten W's FCC testing at Compliance Certification Services around May timeframe. But there are significant pre-launch risk involved as there are many companies prying on FCC website. See the following link to see my point here:
http://www.palminfocenter.com/view_Story.asp?ID=3467. The headline of "FCC leaks ..." also is a reputation detriment to FCC which I would want to avoid to uphold the FCC image.

Also, be to competitively fair, will FCC require Handspring to do zero-gap measurement on its 270 product?

My contact information starting 8/26 is:

David Woo
Tel # 408-503-1587
Fax # 408-503-8330
Email: David.Woo@corp.palm.com
400 N. McCarthy Blvd
Milpitas, CA 95035

-----Original Message-----

From: Martin Perrine [mailto:MPERRINE@fcc.gov]
Sent: Thursday, November 21, 2002 6:08 AM
To: MKUO@CCSEMC.com
Cc: Tim Harrington; David Woo
Subject: RE: Request for additional information

Dear Mike and David

I'll discuss further with Kwok and Tim

The main difference I see between handspring and Palm applications is the grant date.

We are asking for zero gap data for current applications.

I'll get back to you

Best Regards

Martin Perrine

>>> David Woo 11/20/02 08:07PM >>>

Hi Martin Perrine:

This is David Woo, compliance manager of Palm. I have the following to add regarding question #2 D), zero-gap SAR measurements. I reviewed the entire FCC test report of Handspring Treo270, FCCID# 08FNYY2, and was quite aware that Handspring, Palm's direct competitor, did not do any zero-gap SAR measurements. Our similar-feature product with FCC ID # 03W710000 completed the FCC SAR testing at CCS around the same time (i.e. May) that Handsprings receives its FCC grants from American TCB. Soon after finishing all the FCC SAR testing at CCS, just to be sure, I visited Tim Harrington and Rich Fabina @ FCC to discuss a) confidentiality of submitted information as part of the FCC filing; and b) correct SAR measurements. From that meeting, I was advised that Palm can use our belt clip accessory with our handheld device as part of the SAR measurements, similar to what Handspring has done in its FCC filing. This makes perfect sense to me as it ensures competitive fairness as using belt clip is an acceptable SAR measurement method. By the way, this meeting is in addition to a separate, independent confirmation that I have with Mr. Kwok Chan prior to my starting the entire FCC testing at CCS for FCCID# 03W710000 product.

I want to emphasize that Palm has taken very deliberate measures to ensure product confidentiality and we follow the correct prevailing SAR measurements acceptable to FCC. I knew nothing about the zero-gap SAR measurement from Tim, Rich, Kwok.

By the way, it's worth mentioning that our belt clip contains no metal, it's entirely leather.

My contact information starting 8/26 is:

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Tel # 408-503-1587
Fax # 408-503-8330
Email: David.Woo@corp.palm.com
400 N. McCarthy Blvd
Milpitas, CA 95035

-----Original Message-----

From: Mike Kuo [mailto:MKUO@CCSEMC.com]
Sent: Tuesday, November 19, 2002 7:17 PM
To: 'mperrine@fcc.gov'
Cc: David Woo
Subject: FW: Request for additional information

Hi Martin:

There are some issues and questions that I need to discuss with you first.

After I have clear direction from you, I will follow the procedures to get back to your questions via FCC web site.

I copied this e-mail to Mr. David Woo who is the primary contact at Palm. Due to nature of questions, I would like to request the information discussed herein as confidential information between FCC/CCS and Palm. After we have agreement on how to take the actions, we will provide all the necessary information to FCC web site.

Reply to question #1: Palm has agreed to modify the statement in the user manual per your instruction. Revised portion of user manual will be provided to FCC web site.

Reply to question #2:

A) We have examined the both version, there is no variations in metallic components in both version.

B) Verify with Palm and have physically examined the holster, the PDA can only be inserted into holster in one way which is LCD panel faced away from the body (same position as demonstrated during SAR tests.)

C) SAR tests were performed with headset plugged into the PDA. Has confirmed with Palm that PDA can only with headset to establish voice communication. This PDA does not equip with option to allow head to head or face operation.

D) Attached please find TCB Q and A file. As indicated in the question #7. The SAR tests were done in May 01, 2002. Due to confidentiality of product announcement, Palm requested this product can only be disclosed after Oct.25, 2002. David did discuss this project with Kwon Chan, Tim and Steven during his FCC visit in April and July. He has confirmed with them about the test position. In addition to the confirmation, I also reviewed the Handspring FCC ID:O8FNYY2 application certified by American TCB and Audited by FCC. In this application, there is no request from FCC for zero gap lap held SAR tests.

David Woo will try to call you tomorrow to discuss this application. I will work with David Woo to gather all the responses to address your questions.

Best Regards

Mike Kuo

Confidential between CCS/FCC and Palm.

-----Original Message-----

From: oetech@fccsun34w.fcc.gov [mailto:oetech@fccsun34w.fcc.gov]

Sent: Tuesday, November 19, 2002 2:18 PM

To: mkuo@ccsemc.com

Subject: Request for additional information

To: Mike Kuo

From: Martin Perrine

mperrine@fcc.gov

FCC Equipment Authorization Branch

Re: FCC ID: O3W710000

Applicant: Palm Solutions Group
Correspondence Reference Number: 5889
731 Confirmation Number: TC253648
Date of Original Email: 11/19/2002

Subject: Request for additional information

In regards to your recent TCB grant referenced above we kindly request that you provide the following additional information.

1) New user manual statement modifying the body-worn safety statement. The statement " Use of accessories not provided by Palm" could easily be misinterpreted. Please provide a more specific statement such as " use only with the specific Palm accessories that this phone has been tested for compliance with" or "SAR compliance for body-worn operating configurations is limited to the specific belt-clips/holsters/accessories tested for this filing".

2) Additional SAR data as appropriate based on the following. A) No keyboard version if there are any metallic variations with tested model. B) Test device front to and away from phantom if it will fit in holster either way. C) With and without headset if device can transmit at waist without headset. D) Zero gap position to evaluate SAR for "held on lap" position.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c).

DO NOT Reply to this email by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, E-Filing, OET TCB Electronic Filing, TCB Login. If the response is submitted through Add Attachments, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.