

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

December 13, 2004

RE: FCC ID: O6Y-UT106_ATCB001989

Attention: Rick McMurray / Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that when the power between the EMC and SAR report are not the same, the power used in the SAR report is to be the higher of the two. This way it is insured that the highest SAR is achieved. Please note that while only 5mw difference exists the reports do show that the SAR report did not have the higher level. Please explain and justify why the SAR report did not test with the higher power. (i.e. the devices used were the same device but differences in measurement equipment may explain the difference). In any case, please explain.

Response: The same unit was used for both EMC and SAR testing. Though the SAR report indicates the lower value, the 5 mW difference (3%) between the reports is well within the measurement uncertainties between the labs. Additionally, the maximum SAR value of 0.151 W/kg is over one magnitude smaller than the limit for this device (1.6 W/kg).

2. Please note that page 8 of the manual states that the device has been tested for body worn operation. Please note that the SAR report does not contain any body worn configuration testing. Please provide this test data for body worn operation.

Response: This is not a body-worn device, and no SAR testing was done for body-worn operation. Please see the revised manual uploaded with this response.

3. Please provide the distance of separation between the phone and the body for body worn operations. This separation distance should be in the report as well as in the manual. Please note that OET65C states that in this type case the separation distance should be in the manual (see page 41 of OET65C). Please provide this separation distance in the manual.

Response: No separation distance is provided, as this is not a body-worn device.

4. Please note that the tune up procedure is not listed in the request for confidentiality. If this exhibit is desired to be held confidential, please provide a request for confidentiality that includes this exhibit.

Response: The tune up procedure should be confidential; a revised confidentiality request has been uploaded with this response.

Dennis Ward
mailto:dward@AmericanTCB.com

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued. Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.