



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

July 11, 2003

RE: Handspring Inc.

FCC ID: O8FBW

After a review of the submitted information, I have a few comments on the above referenced Application.

General

- 1) Please provide a parts list for this device. If necessary, please update the confidentiality letter.
- 2) Please provide internal photograph of the following:
 - a) Area underneath the shield located next to the camera and underneath the Radio Module.
 - b) Area underneath the insulation material located on the back of the main board.
- 3) Information in the artwork for the label appears to show the FCC logo. Please explain if this is being utilized on the device and for what approval it pertains.
- 4) Please provide the DC voltages/currents applied into the transmitter module for normal operation over the power range.
- 5) The users manual appears to be missing information required by 15.21. Although portions of this information appears (relative to the antenna), it does not appear to be complete.
- 6) Due to the information given in the users manual (page 20), this device may also be considered a PC peripheral. Please comment on if appropriate testing has been performed (under a DoC) and note that additional labeling and manual statements may be necessary. Please call to discuss.

EMC Report - 800 MHz CDMA

- 7) I believe that CDMA 800 MHz allows for channels in the 824.7 - 848.31 MHz, However the test report page 3 of 17 states 825.25 - 847.75 MHz. Note that the FCC requires testing at the lowest/highest available channels in each block. Please explain.
- 8) The test report page 4 of 17 mentions the EUT is an amplifier regarding Frequency Stabilization which does not apply to this device. Please correct.
- 9) In the Substitution Methods (page 6 of 31 of 800 MHz CDMA) Note 1 explains that the EIRP = Pin + reduced by db Value + Gain. However it appears that the Pin value may already be corrected by the "reduced by dB value" instead of factored in the calculation as the note implies. Please confirm that the data is correct and provide further clarification regarding the calculations. Please correct the table if necessary.
- 10) Please correct or add the ERP value for power output to the results in page 7 of 17. Note that the FCC uses ERP for Part 22.
- 11) Compliance with the low end of the B* block can not be determined from the plot provided on page 17 of 31 (800 MHz CDMA) since the block edge starts at 846.5. Please provide a new plot for this bandedge.
- 12) The frequency stability results for temperature look unusually small (page 46 & 47). Please check results to see if they are actually listed properly and the correct units is given in the table (Hz).
- 13) FYI. As of February 2003, the FCC implements revisions to Part 22. For future reports, please follow the requirements of these revisions, as it will make reviewing the reports much easier since many section references are different than previously. Attached is a copy of the changes to Part 22.

EMC Report - 1900 MHz CDMA

- 14) The test report page 4 of 17 mentions the EUT is an amplifier regarding Frequency Stabilization which does not apply to this device. Please correct.
- 15) In the Substitution Methods (page 6 of 31 of 800 MHz CDMA) Note 1 explains that the EIRP = Pin + reduced by db Value + Gain. However it appears that the Pin value may already be corrected by the "reduced by dB value" instead of factored in the calculation as the note implies. Please confirm that the data is correct and provide further clarification regarding the calculations. Please correct the table if necessary.

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- 16) The high channel block C 1270 on page 15 appears over 2 MHz below the band edge. Please confirm if this is the actual highest channel used in this block. Otherwise please provide a new plot for this bandedge.
- 17) Please explain the 0.0631 ppm listed for 1900 MHz CDMA. It appears from the report this should be 0.0551 ppm based on 102 Hz at 1851.25 MHz.

SAR Report

- 18) The frequencies listed in the SAR report for CDMA 800 MHz are 824.7 - 848.31 MHz. However the EMC test report page 3 of 17 states 825.25 - 847.75 MHz. Note that the FCC requires testing at the lowest/highest available channels in each block. Please explain.
- 19) The FCC asks that we compare the EMC and SAR power measurements for purposes of ensuring the power during SAR was set to maximum. However the EMC reports only listed ERP and EIRP power measurements while the SAR report included conducted measurements. Please explain how a comparison between the 2 can be shown.



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Examining Engineer

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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.