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

July 19, 2003

RE: Handspring Inc.

FCC ID: O8FDK

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

General

1) Please provide internal photograph of the following:
    a) Top of the main board with the RF module removed.
    b) Area underneath the insulation material located on the back of the main board.
2) It appears that the information regarding the voltage and currents are given for the entire device. Please explain if this information is also valid for the several elements of the final radio frequency amplifying device or if not, please provide this information.

Part 15 Class B review

3) Please provide the test photographs for this testing as part of a separate exhibit.
4) From looking at the operational description, it appears that this device (not including the transceivers) has a 144 MHz clock. According to 15.33(b)(1), this requires digital device emissions testing to be performed up to 2 GHz. It does not appear that this testing was performed. Note that EN55022 does not have this requirement.
5) The conducted emissions appear to be tested to Class B, but page 11 of 14 mentions Class A. Please explain.
6) It is not clear the test distance used for Run #2 for Radiated emissions. This appears to be a 3 meter test, but page 4 of 14 mentions 10 meters. Please clarify.
7) Please provide the RBW and VBW settings used for the following:
    a) 30 - 1000 MHz Radiated
    b) > 1000 MHz Radiated
    c) 0.15 - 30 MHz Conducted

Users Manual

8) The user manual reports the Head value of SAR for 850 MHz as 1.36 (page 85), however the test report shows 1.49 (SAR report page 6 of 68). Please correct.
9) Additionally, from information given in the users manual, the internal module used in the device is designed for operation in both the North American Cellular (850 MHz) and PCS (1900 MHz) bands and also European GSM (900 MHz & 1800 MHz). This application only covers the North American (850 & 1900 MHz) bands. Please provide information that shows that this device is not capable of transmission in the 900 and 1800 MHz bands in the U.S. Additionally, this device will include the following on the grant: "This device contains 900 MHz EGSM and 1800 MHz DCS functions that are not operational in U.S. Territories. This filing is only applicable for the 850 MHz and 1900 MHz GSM operation only.

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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.