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-ORIGINAL EMAIL INFORMATION-

To: DAVID BARE, ELLIOTT LABORATORIES, INC.
From: Frank Coperich fcoperic@fcc.gov
FCC Application Processing Branch
Re: FCC ID O8FHVP-1H
Applicant: Handspring, Inc.
Correspondence Reference Number: 17208
731 Confirmation Number: EA98852

Frank,

Below are Handspring's answers to your latest questions regarding our Part 24 VisorPhone Certification application. I have included the original email text as well.

Please let me know if you have additional questions or concerns.

Thanks,

David Waitt
Handspring, Inc.

FCC QUESTION #1

Reply to item #1 indicates it is correct to adjust the measured field strength with the antenna gain. When field strength is measured and converted to EIRP, the antenna gain of the test device is included in the measurement; there should not be any additional antenna gain adjustment for converting the field strength to EIRP. We have chosen to identify a measurement procedure for radiated power output that is acceptable for the purposes of Certification of licensed transmitters. The substitution method is designated. This may commonly be viewed in the ANSI/TIA/EIA - 603 - 1992 document. Please use this method for this unit and for future applications.

HANDSPRING

Thank you. In the future this method will be used.

FCC QUESTION #2

Reply to item #1 indicates the SAR test lab did not do any output power measurement to confirm device output. The additional SAR procedure explained by the test lab is applicable for verifying device output stability during the SAR test, which does not verify actual device output. Both output power and output stability are needed to support the SAR results. Since the SAR results are not very high, output stability is not a major concern. However, the conducted output power should be verified, especially when there are other output discrepancy issues (#1). Please verify the conducted output for the sample tested for SAR.

HANDSPRING

The transmit power was measured by removing the antenna and connecting a short coax cable to the RF output. This was then connected to a HP power meter. The RF transmit power on the low channel was measured at 29.9dBm.

FCC QUESTION #3

Response #4 did not fully address the issues. The reply indicates there could be two versions of this product using varying component and different component placement. The device has three operating modes - PCS, GSM 900 and GSM 1800. Reply also indicates all products sold in the U.S. will have the same component configurations. For purpose of equipment certification, the grant of equipment approval only covers the product specified in the filing for operating in the U.S. Products sold overseas with different hardware configurations that are not be covered by this filing would not be able to operate in the U.S. even if it has PCS capability. Please clearly identify the exact hardware configuration and operating frequency bands for the product to be included in this filing. All products authorized under this filing (bearing this FCC ID) must have the same hardware configuration as approved.

HANDSPRING:

There will be only one version of the phone sold in the U.S. That version will operate ONLY within the US PCS bands (1850.2-1909.8MHz MS Xmit and 1930.2-1989.8MHz MS Rcv). The overseas version of the phone will not be sold in the US. Only phones sold in the U.S. will bear the FCC ID and all phones sold in the U.S. will have the same hardware configuration.

FCC QUESTION #4

The proposed RF exposure statement in the manual needs revision. The device was tested with two body-worn accessories, a leather carrying case and a belt-clip. The SAR results only support body-worn compliance using these two accessories. The proposed separation distance of at least 1 inch is not applicable; please revise accordingly. The next bullet item in this manual section on data mode operations should clearly indicate that the distance is from the body of persons to avoid possibilities of misinterpretation.

HANDSPRING:

The statement in the manual has been revised as was discussed in our telephone conversation on 30 Nov 2000. The revised text has been uploaded as an attachment.

FCC QUESTION #5

Also, please note that the attenuation requirement for spurious emissions as prescribed under Section 24.238 is $43 + 10\log(P)$. This is referenced to the desired signal yielding dBc. The attenuation specification is not XX uV/M. The dBc is determined from the substitution method as described in the ANSI/TIA/EIA-603-1992 document. In the future applications, please submit data / results obtained in this manner.

HANDSPRING

Thank you. In the future the data will be submitted as requested above.