



Handspring, Inc.  
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To:	david waitt, handspring inc
From:	Andy Leimer aleimer@fcc.gov FCC Application Processing Branch
Re:	FCC ID O8FHVP-1H
Applicant:	Handspring, Inc.
Correspondence Reference Number:	18984
731 Confirmation Number:	EA100462

To: Andy Leimer, FCC  
From: David Waitt, Handspring, Inc.  
Date: 22 May 2001

Andy,

Below are responses to your request for additional information regarding Handspring's permissive change application to its O8FHVP-1H grant (EA 100462). In addition to replying, there are also some questions that I have that I need your help with. I appreciate any help you can provide.

Regards,

David Waitt

**FCC:** The case changes incorporating aluminum could effect the EIRP and spurious radiated emissions. Please submit new EIRP and radiated spurious emissions data. Note that in order to qualify for a Class II Permissive Change Grant, the EIRP must not change. If it does change a new application will be required with a new FCC ID.

**Handspring:** I am in need of some help from you concerning your request #1 (additional EIRP and radiated spurious emissions test data).

When I tell my superiors that I must return to the lab and spend additional time (1 to 1.5 days) and thousands of dollars to do the testing requested, they are going to ask me for a technical reason why we must do this. At this time I am unable to answer, so I am looking to you for help.

I am puzzled as to why a device that meets the FCC requirements for a module must be retested for radiated emissions of harmonics simply because it is being inserted into a new host? I believe that if this were an intentionally radiating PCMCIA card (i.e., a wireless modem) my understanding is, as far as the FCC is concerned, it could be installed into any host without required retesting.

If I am correct in my assumption, this raises the question in my mind -- Why is the position of the FCC apparently inconsistent from one type of "module" to another type of "module"?

I do not believe that the FCC has requested manufacturers of PCMCIA cards (or ANY type of intentionally radiating device that meets the module definition) to return to the lab and retest because some company built a module host product with more or less metal or plastic in the housing. Am I correct? I was under the impression that the manufacturer of a product that meets the FCC definition of a module does not have to test that module in each and every possible type host.

Any help you can provide here would be greatly appreciated since, as I mentioned, I will have to justify this additional time and money expense to my superiors and I need some technical support.

Additionally there is a significant question of what constitutes a "change" in EIRP of the device. You correctly point out that a change in EIRP cannot be implemented in a product with a permissive change.

The FCC has made the request that Handspring return to the test lab and measure the EIRP of the unit. It is unclear to me why the FCC feels that average EIRP may have changed. As I am sure you are aware there is not a great deal of repeatability in these field strength measurements. Results from the same OATS on different days can easily yield results that differ by 3dB. Wouldn't you agree with this proposition?

Given the level of repeatability in the measurement, it is only fair to ask that the FCC specifically define what constitute a "change" in EIRP ( i.e., a range of acceptability) prior to any possible additional testing. It was suggested that I perform the test and send the data to the FCC and wait to hear if we passed or not. I am sure you can understand why I cannot do this. I cannot return to the lab and test to an undefined specification. Testing is time consuming and expensive. It is necessary to understand what levels are acceptable so that the equipment can be designed to operate in that fashion. It is therefore respectfully requested that the FCC specify what constitutes a change of EIRP.

**FCC:** Confirm that the extrapolated separation distance of 6.7 mm used for the body -worn configuration represents that of the carrying case and the belt clip.

**Handspring:** See the separate reply from April labs, uploaded with this document.

**FCC:** FYI: In future applications do not extrapolate a separation distance for the body -worn configuration. Perform the body-worn SAR test using the actual accessories.

**Handspring:** See the separate reply from April labs, uploaded with this document.

**FCC:** FYI: You requested that the classification be changed to "Part 24 Equipment Worn on Body." This cannot be done for a Class II Permissive Change application since the classification must match that of the original Grant.

**Handspring:** Given this, we will retain the current classification

**FCC:** The tissue parameters showed too much variance over the recommended values. In the future it is recommended that the tissue variance not be greater than 10% over those recommended in the IEEE SCC-34 document.

**Handspring:** See the separate reply from April labs, uploaded with this document.

I appreciate your help in regards to my questions above.

Sincerely

A handwritten signature in dark ink, appearing to read "David Waitt", with a stylized flourish at the end.

David Waitt