



Handspring, Inc.  
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From: OET [oetech@fccsun07w.fcc.gov]  
Sent: Thursday, May 24, 2001 11:49 AM  
To: dwaitt@handspring.com  
Subject: Technical Request

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: 19409  
731 Confirmation Number: EA100462

To: Andy Leimer, FCC  
From: David Waitt, Handspring, Inc.  
Date: 08 June 2001

Andy,

Below are responses to your request for additional information regarding Handspring's permissive change application to its O8FHVP-1H grant (EA 100462). I hope this will clear up any remaining issues with the permissive change application. If not, please let me know as soon as possible.

Please also note that Handspring still has issues with the manner in which the FCC is treating this type of modular device, and we look forward to working with the FCC to resolve these issues prior to future permissive changes. In the interest of resolving this permissive change request in the timely manner we have repeated the tests the FCC requested. The results are uploaded with this reply.

Regards,

David Waitt

**FCC:** The original Grant was NOT for a module as defined in Public Notice DA 00 -1407. Modular approval is NOT Granted for licensed portable devices. Grants issued for FCC modules contain the Grant Condition "Modular Approval" in the Grant comments. The device as tested is a Composite device.

**Handspring:** I understand that the original grant was not for modular approval. I wanted to point out that despite the grant, the product met the FCC's definition of a module.

**FCC:** Measurements of EIRP and spurious emissions must be done to determine compliance of the modified unit. The modifications as described in the application suggest that their could be potential changes to EIRP and spurious emissions. It is noted in the application that the SAR values have increased.

**Handspring:** Increased SAR values do not necessarily indicate an increase EIRP. Note that the Visor Edge that the VisorPhone is being inserted into is approximately ½ as thick as the Visor units used in the original grant, thus the unit under test is closer to the phantom, and this would yield a higher SAR even with NO INCREASE in EIRP.

**FCC:** The emissions data in the Original application was NOT done with the substitution method as described in TIA/EIA-603, Section 2.2.12. New EIRP and spurious emissions testing is required since the substitution method is required for all licensed devices. This provides more reliable data than field-strength measurements.

**Handspring:** Handspring returned the unit to the lab to re-measure the EIRP. The data is being up-loaded to the FCC site with the response. Note that the original EIRP was measured at 29.98dBm max (H). The EIRP was measured at the same time as the radiated harmonic emissions at 28.8 dBm max(H) EIRP and re-measured again in June at 29.0 dBm max (H).

The maximum delta of these measurements over the course of 9 months on three different VisorPhones in different Handspring Visors is 1.18 dB

**FCC:** To qualify for a Class II permissive change an EIRP tolerance of 3 dB is acceptable. Measurement tolerance is described in TIA/EIA-603, Section B5.17. The device must still be compliant regardless of the tolerance.

**Handspring:** The measured EIRP was within 3dB of the original measured EIRP.