



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

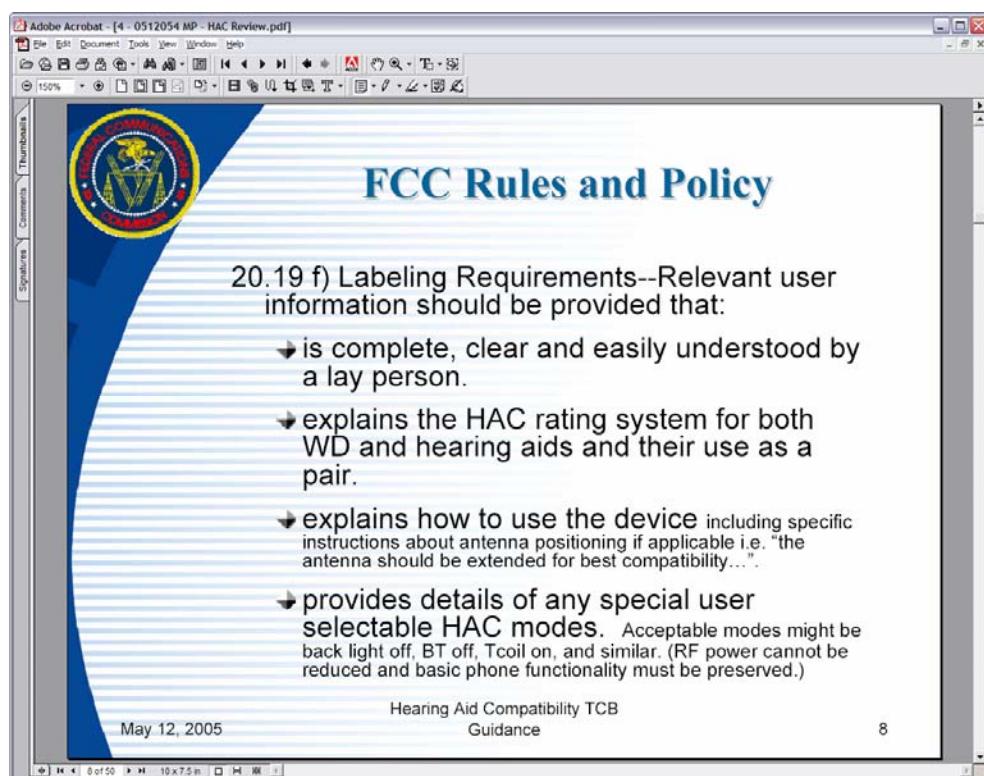
September 29, 2005

RE: Palmone Inc.

FCC ID: O8FJIMI

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

- 1) What kind of users information is provided to the user regarding HAC (i.e. manual, insert, packaging material, etc.) for compliance to 20.19(f). Please note the following from the FCC:



- 2) The test report cover and other portions of the report mentions C63.19-2005 but the engineering summary suggests this was tested under C63.19 – 2001 (page 4) instead. Please note that TCB's must carefully consult with the FCC for any reports granted using the C63.19-2001 version which would delay evaluation of this application. Please explain which version was used for testing. If relevant, please correct.
- 3) The test report references this as a prototype. The FCC asks for any differences between a prototype and the final production unit to be explained.
- 4) Test report should cite compliance to 20.19 according to 2.1033(d) of the rules:  
2.1033(d)  
Applications for certification of equipment operating under part 20, that a manufacturer is seeking to certify as hearing aid compatible, as set forth in §20.19 of that part, shall include a statement indicating compliance with the test requirements of § 20.19 and indicating the appropriate U-rating for the equipment. The manufacturer of the equipment shall be responsible for maintaining the test results.

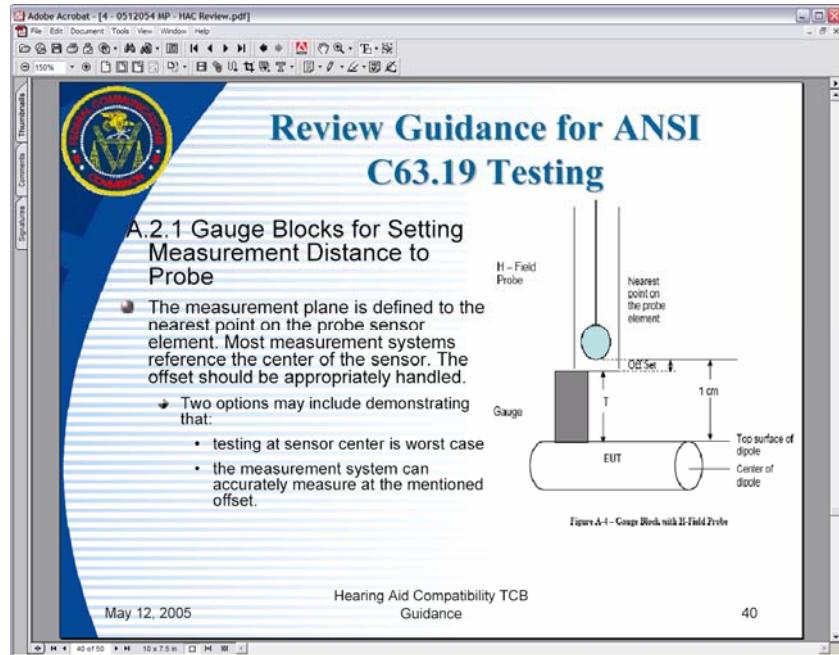
- 5) The FCC asks that power measured is greater to or equal to that measured in EMC report. 850 was listed as EMC reports show slightly higher power (24.2 dBm for some channels). HAC report appears to possibly use rounded numbers (24 dBm). Please review.
- 6) Please discuss how the Bluetooth portion of the device is addressed in this filing.
- 7) Please provide system verification targets/discussions for all three signal types recommended by C63.19. For the WD signal please detail the source for the WD signal for system verification and how it compares to the actual signal from the WD.
- 8) Validation at system reconfiguration should be preformed with at least the type of modulation being tested (C63.19 4.2.2.1.2 and May 2005 FCC training). Please explain if this was performed as the validation in the report appears to be only for CW signals.
- 9) The report should provide an appropriate grid or overlay of the device for reference purposes.
- 10) Please provide details of the WD's signal. Include wideband and 0 span spectrum analyzer plots. How was the signal set up and controlled (i.e. Please explain procedures used to establish test signals)? What settings were used, i.e. power control modes, and radio service mode. How was power loop controlled during the test?
- 11) During measurement of probe modulation response with a modulation equal to the device being tested, please explain if the substitution signal did or did not have real time power loop control activated which can affect the output signal and correction factors used during the test. Please explain how this was accounted for.
- 12) Please provide additional details justifying the conversion to peak; particularly the procedure used to measure power. Note that originally the VBW was required to be > than the 20 dB bandwidth of the signal. However recently the FCC released information stating that a 20 kHz VBW was allowed in lieu of the full VBW. Please explain as necessary.
- 13) Please explain the test dates on the plots of April 1, 2005 and October 2, 2004. This appears odd. Additionally, only one validation appears to have been done.
- 14) 850 MHz does not appear to meet the requirement that 4 sub-grids be common to the E-field and H-field scans for a given grid. These frequencies only appear to show 3 common grids. Please review and correct results as necessary.
- 15) How was drift measured? The FCC asks for demonstration that device power is steady through test. (i.e., Before/after power or field drift (<5%)).
- 16) RF test procedures appear to be for clause 4, but the flow chart appears to be for Hearing aides. Please review/explain/correct as necessary.
- 17) Scan procedures do not support enough detail. For instance the procedures should clarify the information shown in the slide below from FCC training. Additionally, the contours on many plots suggest that maybe a smaller step size should have been used. Please adjust the test report or comment on the items given in the follow slide:

The screenshot shows a PDF document titled "Review Guidance for ANSI C63.19 Testing". The title is in a large, bold, blue font. Below the title, a section is titled "4.3.1.2.2 Automated Scanning Method". This section contains a bulleted list of requirements:

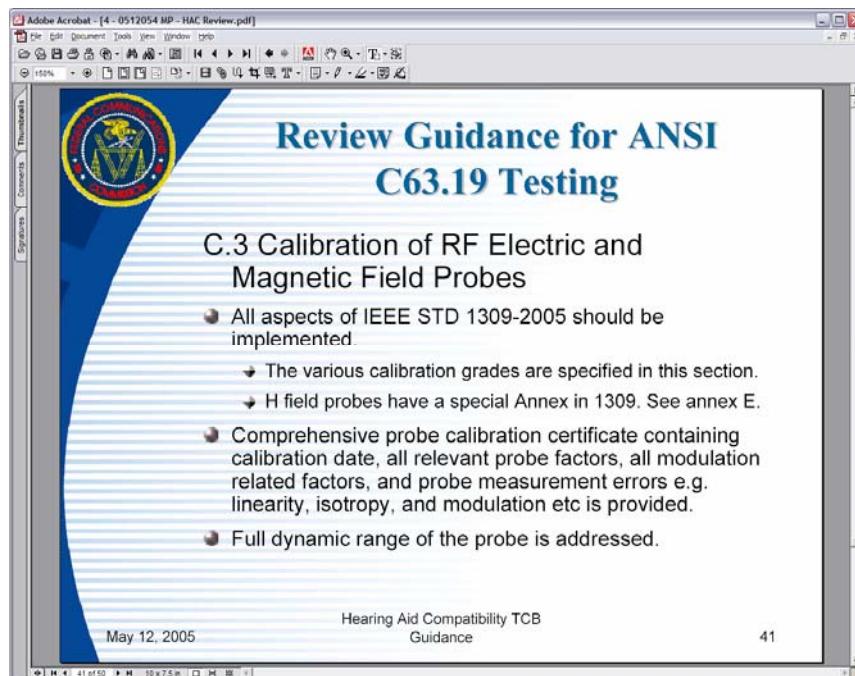
- Description of scan procedures, including step size, locations relative to the measurement grid, and peak location determination.
- Step size should be justified and not exceed 5 mm. Uncertainty evaluation concerns should be reviewed to see if smaller step sizes are necessary.
- Consider spanning grid line to avoid question with shared values on grid lines e.g. 3.334 mm.
- Contour plots should be reviewed and demonstrate that finer step size would not be required.
  - ◆ Peaks should be clearly defined and of a dimension (e.g. 3 dB width) much greater than the step size.

At the bottom of the page, it says "May 12, 2005" and "Hearing Aid Compatibility TCB Guidance". The page number "32" is also visible.

18) Please justify probe measurement at the center of the sensor. C63.19 recommends measurement at the nearest element point. Please include additional illustrations of the probe/elements showing more detail of the probe tip area. This is for compliance of information shown in the following slide:



19) Probe calibration information does not appear to contain enough details for FCC filings. Please reference the following material:



20) Please describe how probe rotation was accounted for in the filing. If applied, please show the grid location where the probe rotation was made. Note the FCC requests that probe rotation should take place at the peak after exclusion for at least the worst case configuration. Reported result should account for this rotation.

21) FYI....In the future, please consider providing more information regarding details/specifications of the dipoles and probes used in the report.

- 22) FYI....An obvious error in the frequency of the PCS band appears on page 7.
- 23) FYI....The FCC desires (but not necessarily requires according to May 2005 training) the 3 test signals mentioned in 4.2.2.1.2 to be done weekly.



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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.