



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

October 17, 2005

RE: Palm Inc.

FCC ID: O8FJIMI

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

Technical

- 1) For the CDMA 2000, the FCC asks for the following information. Please provide information regarding this.

Filings should be clear about transmitter setup & operation capabilities to ensure devices are configured properly according to communication protocol and operating requirements to obtain valid SAR and EMC results. Supporting info should include but may not be limited to:

- a) CDMA MS Protocol Revision number.
 - b) applicability of test codes to simulate the required test conditions, as defined in 3GPP2, TIA, and other standards.
 - c) Base station simulator and test device configuration info and procedures used to maximize output in all applicable modes, including code domain channels, power & relative gain levels.
 - d) Identify CDMA Radio Configurations, Service Options, multiplex options, voice/data, code channel combinations and options used for the SAR tests.
 - e) Because of the different RC's, SO's, data rates, channel combinations and modulations, filing should include justifications on the selection of applicable configurations to establish and maintain maximum output to demonstrate SAR compliance for other configurations that are not tested.
- 2) The users manual mentions an option for use with an SDIO card. This does not appear to be covered by this application, nor can a TCB currently process this with an SDIO card installed due to certain SAR issues. Please explain.
 - 3) The FCC asks that power measured is greater to or equal to that measured in EMC report. EMC reports show slightly higher power (24.2 dBm for some channels). HAC report appears to possibly use rounded numbers (24 dBm). Please review/explain.

Part 15.247 DSS Report

- 4) For IC, spurious emissions for the RX emissions for Bluetooth must also be shown. Please provide.

HAC Report

- 5) 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.
- 6) Please discuss how the Bluetooth portion of the device is addressed in this testing.

IC RSS Reports

- 7) The emissions designator on page 4 appears incorrect.
- 8) Please provide an appropriate RSP-100 form and cover letters regarding REL listing and RSS-102.
- 9) Label for IC appears to be missing the model as required by the IC regulations.
- 10) Please explain compliance to RSS-133 section 5.4 and RSS-129 section 5.14.
- 11) Please provide an attestation as required by RSS-129, Section 12.



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.