



Palm Inc.
950 West Maude Avenue
Sunnyvale, California 95085-2801

To: Mr. Tim Johnson, American TCB
From: David Waitt
Subject: FCC ID: O8FJIMI
IC: 3905A-JIMI

Date: 18 Oct 2005

This letter addresses your concerns regarding the FCC & IC application for the new Palm Treo product

If there are any questions or if additional information is required, please contact me at david.waitt@palm.com

On behalf of Palm Inc,

A handwritten signature in black ink, appearing to read "David Waitt".

David Waitt
Sr. Regulatory Engineer
David.waitt@palm.com

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.
Palm: The MS protocol revision number is: **PREV6**
- 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.

Palm: SAR testing was accomplished by establishing a phone call between the unit under test and a Willtek CDMA test set (4303 Mobile Service Tester, S/N 1141417, Cal due: 9 June 2006). The phone call was established and handed off to the different test channels. The transmit power of the phone was set to "All Ups" (maximum transmit power) and of course the transmit duty cycle was 100%. Under these maximum power conditions, the measured SAR was well below the limit of 1.6 W/kg.

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.

Palm: There will be a Class II Permissive change filed with the FCC as soon as this initial grant is issued. It was necessary to include text in the manual regarding the SDIO transmitter because the user manual had to be finalized prior to the initial grant being issued and it was not possible to add the SDIO text after the initial grant and still have it appear in the manual by the time the product launches.

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.

Palm: The units tested for HAC compliance and EMC was chosen completely at random off of the manufacturing line and is physically a different unit from the one tested for EMC compliance. This was done so that the test could be done in a timely manner in parallel at the different labs rather than serially. The .2 dB difference is simply due to typical manufacturing tolerances transmit power between the two different units.

Part 15.247 DSS Report

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

Palm: Worst case Bluetooth emissions occur when the unit is in transmit mode. Given that the spurious radiation in TX is below the limits. RX spurious are complaint with the requirements

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.

Palm: There are no differences that would have any effect on the 15.247 DSS results between the prototype unit that was tested and the final production version of the phone.

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

Palm: The Bluetooth profiles in the phone are intended to communicate with Bluetooth headsets, hands-free devices, car kits and so on. None of the intended Bluetooth usage models involve holding the phone to the ear. Thus there would be no HAC requirement for testing in these configurations.

IC RSS reports

7) The emissions designator on page 4 appears incorrect.

Palm: The emissions designator should be: 1M27F9W

8) Please provide an appropriate RSP-100 form and cover letters regarding REL listing and RSS-102.
Palm:

9) Label for IC appears to be missing the model as required by the IC regulations.

The model number was removed from the drawing of the label submitted in order to maintain the confidentiality of the model number since the FCC will not hold a label drawing confidential, even for a short time. Please see the IC Confidential label exhibit uploaded to the ATCB site.

10) Please explain compliance to RSS-133 section 5.4 and RSS-129 section 5.14.

Palm: An attestation has been provided

11) Please provide an attestation as required by RSS-129, Section 12.

Palm: An attestation has been provided