Handspring, Inc.
189 Bernardo Ave.
Mountain View, CA 94043

May 28, 2002

Timothy R. Johnson
Examining Engineer
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

RE: Handspring Inc
FCC ID: O8FLON

Mr. Johnson,

This is in reply to your request for additional information on our recent certification application for FCC ID O8FLON. Handspring has elected to address some of these issues and Celltech Research is addressing the remaining issues. Your questions are included below for your reference.

EMC Report

1) Please upload an exhibit for the operational description of the device.

I have uploaded a Hardware specification for the (London) Treo 300. The information in this document and the previously uploaded user guide describe the operation of the device.

2) The following information required by 2.1033(c) was not provided. Range of operating power values, DC voltages/currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range, and tune up procedure. Since the device in this application utilizes a transmitter module, please provide the range of operating power values being utilized as configured for this device, the DC voltages and currents being supplied to the module, and any tune up procedures necessary (or if this is not possible, please provide an attestation that the module does not provide for any user/integrator adjustable parts).

Detailed RF module DC power requirements are included on page 27 of the document "CDMA_Module_Product Specification v1.1.pdf" that was uploaded with the initial application.

Handspring does not have access to any RF module tune up procedure. The RF module is a purchased component with no RF tuning adjustments accessible to Handspring. The device is configured and calibrated at the manufacturers factory prior to being shipped to Handspring.

3) The internal module used in the device is designed for operation in both the North American Cellular (800 MHz) and PCS(1900 MHz) bands. This application only covers the PCS (1900 MHz) band. Does this device capable of operating in the American Cellular (800 MHz) band as well. Please explain.

The products are not capable of operating on the 800 MHz North American cellular band due to the fact that the products are GSM and there is no infrastructure in North America on 800MHz that supports GSM.

4) FYI, For future applications, please separate the external and internal photographs into 2 separate exhibits. We are required to upload separate exhibits to the FCC for each of these. For this application we have already pulled the appropriate photographs from the files provided.

OK.

SAR Report

1) The EUT appears to be able to transmit with the clam shell open or closed. Please provide an explanation as to why only the open configuration was used for the ear-held configuration.

If there is a headset plugged into the unit, when the "Clamshell" is closed, the audio is transferred to the headphone jack. If the unit is closed during an active call and there is no headset plugged in, the call will be disconnected. This is one of the intended methods of "hanging up" the phone.

2) Please confirm only 1 battery configuration is currently available for this device.

Yes, that is true and the battery is not intended to be changed by the user.

3) The FCC likes to be able to confirm that the 15 cm liquid depth was present by supporting photographs or Z-axis data. This supplemental information was not provided. Please confirm that the liquid depth was at least 15 cm, and if available please provide the photograph or Z-axis data.

See Celltech reply.

4) The system center frequency (1880 MHz) was not used to verify the SAR system performance, please comment.

See Celltech reply.

5) Test plots do not include liquid temperatures. It can not be confirmed that the liquid temperatures during SAR testing stay within ± 2° C. Please comment.

See Celltech reply.

6) For course scans, what was the probe tip distance to phantom inner surface?

See Celltech reply.

7) Please provide descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid.

See Celltech reply.

8) Please provide description of averaging (integration) procedures to get 1-g SAR from final interpolated grid.

See Celltech reply.

9) FYI, The flow chart and measurement procedure state '-2dB'from the applicable limit. We believe that this has been changed to -3 dB.

See Celltech reply.

If there is any additional information required, please contact me at dwaitt@handspring.com

Thank you.
David Waitt