



April 10, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Stan Lyles

**SUBJECT: Trisquare Communications Inc.
FCC ID: O9GGMRS380
731 Confirmation No.: EA463951
Correspondence Ref. No.: 22575/22576**

Dear Stan:

On behalf of Trisquare Communications Inc. is our response to your e-mail dated April 9, 2002 requesting additional information for the subject application.

1. In order to validate the scaling of the measured SAR values with respect to the drift of the device, the following procedure was performed. The hot spot location relative to the EUT was determined in advance with a warm transmitter having minimal drift. The transmitter was then allowed to cool to room temperature. The transmitter was then keyed and a 5x5x7 matrix was performed around the hot spot in order to determine the RF exposure. The total elapsed time to perform this evaluation was 270 seconds. The pattern that the probe followed in the scan started from the top left corner to the bottom left corner then to the next row to the right starting at the top. The attached plot of the 5x5x7 matrix reveals considerable drift occurring over the course of the scan. Due to the drift of the EUT, the hot spot, which would normally be in the center of the scan, appeared in the first sampled row. Since the measured SAR value was 1.20mW/g, it is assumed that if the device had not drifted, the measured SAR value at the center of the matrix would be higher. It is therefore assumed that by performing a SAR evaluation on a warm EUT having minimal drift, then adding the total drift of the EUT measured in advance over a period of time, would give a more precise determination of the actual RF exposure during the initial stages of operation.
2. Attached are time sweeps taken at the hot spot location using constant external power with NiMH and alkaline batteries. The results show a consistent drift pattern over the course of the time sweep.
3. Please see attached certificate from the system manufacturer with applicable probe conversion factor for the head.
- 4 & 5. Please see attached revised users manual RF exposure statement.

If you have any further questions regarding the above, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn McMillen", written over a vertical line.

Shawn McMillen
General Manager
Celltech Research Inc.
Testing & Engineering Lab

cc: Trisquare Communications Inc.
Hyak Laboratories