

TIMCO ENGINEERING INC.

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May 21, 2002

Ms. Diane Poole
Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Ref: J COMMUNICATIONS CO., LTD.'S FCC ID: OAJGMRS2200XTM
CONFIRMATION # EA336364, CORRESPONDENCE ID # EA336364,

Dear Ms. Poole:

With regards to your request of 4/25/02, I have uploaded a new SAR report including plots, photos, and data. In addition, the manufacturer has responded to your email as follows:

- 1) Procedures, diagrams, and photographs of how power was measured during SAR testing.

==> The Conducted RF power was measured by RF Power meter as attached photograph.

- 2) Justification of the validity of the SAR measurement. A large drift of .5 dB in SAR was detected from the SAR plots which violates your procedure as stated in section 8.3.4 of the SAR report. As part of the justification please provide power versus time data covering at least 30 minutes. Please also state approximate SAR measurement time.

**==> We've revised our procedure for drift in section 8.3.4 of the SAR report and checked the Conducted RF power versus time for 40 minutes.
Please find the test result as attached file.**

- 3) Revised SAR report. Please revise the statements regarding SAR limits. The General Population limit not Occupational is appropriate for a GMRS/FRS combination transceiver.

==> We've revised SAR report. Please find the SAR limit as attached file.

4) Additional SAR test data using at least 3 sets of AA batteries made by different vendors. Testing at the highest SAR location for both head and body is considered sufficient. Also, provide new body data using the speaker/microphone mentioned.

==> We've retested the above model with three vendors of AA batteries.
Please find the SAR test data as attached file.

5) New system validation data. Supplement C requires validation within 100 MHZ of the device center frequency.

==> Unfortunately, we don't have 450MHz dipole antenna till now.
So, we've contacted SPEAG through DYMSTEC, which is Korea Agency for getting 450MHz dipole antenna as soon as possible.
Please refer to the attached Quotation sheet issued by DYMSTEC for 450MHz dipole antenna.

In this time, we can only use 835MHz dipole antenna for validation.
So, we've revised validation result with new 835MHz head conversion factor as attached file.

FYI It appears that an incorrect probe conversion factor was used for your validation performed at 835 MHZ in head liquid. It also appears that the wrong target value was inserted in your report for the 835 MHZ verification. Values different from the SPEAG documentation.

6) Statement of tissue liquid depth. It appears from the photograph to be less than the 15 cm required by Supplement C. In the future please provide Z axis SAR scans to verify tissue depth.

==> We've revised test report for tissue liquid depth. Please find the statement in the test report as attached file.

7) New uncertainty budget utilizing the draft P1528 template.

==> We've contacted SPEAG and received the uncertainty. Please find the result in the test report as attached file.

Should you have any questions or require any further information, please advise.

Regards,

Sharon Hoffman