

This document was generated in response to a request for additional technical information by Tim Johnson of AmericanTCB, in regards to the Permissive Change (Class II) approval of the model 5135. The information included in 3 specific topics discussed in the following email received by Lin Lu on March 11, 2003:

X-Sender: TRJ/pop.abs.adelphia.net@pop3.norton.antivirus (Unverified)
X-Mailer: QUALCOMM Windows Eudora Version 5.1
Date: Tue, 11 Mar 2003 15:24:25 -0500
To: llu@kyocera-wireless.com
From: "Timothy R. Johnson" <tjohnson@americantcb.com>
Subject: Review of OVFKWC-5135 Permissive Change Application after recent uploads
X-BigFish: cs-72(zz7eeRb3bRaf6Rd74Md75Mf67Mf65Hf69kzzzz1IV)v

Lin,

Please see attached comments regarding this application.

Thank You,

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C:\APPS\EUDORA\Attach\ATCB Comment_031103.pdf

- 1) The testing for spurious radiation via the substitution method appears to have missed the highest measurement previously seen at 5.726 GHz for the PCS band which originally only had a -9.53 dB margin. Please comment.

The TUV testing for spurious radiation via the substitution method had missed some spurs in PCS band, which originally had less than 20 dB margin. They have conducted an additional testing to evaluate the missing spurious. The test report has been updated to include the additional test results, and uploaded to AmericanTCB website.

- 2) The SAR Head Retest plots for the right side of the head show the antenna retracted, while section 4 states they should both be extended. According to the test methodology and the previous results, it appears that the Right Head, Cheek Position, Cellular Band CDMA Mode, Ch777 should have had the antenna extended. However the Right Head, Cheek Position, PCS band, Ch600 should have had the antenna retracted. Please comment.

For the case of Right Head, Cheek Position, Cellular band CDMA mode, Ch777, the testing has been re-conducted. The result and related validation have been incorporated into the report - Additional SAR Information.

For the case of Right Head, Cheek Position, PCS band, Ch600, there was a typo in section 4. This case should have the antenna retracted, instead antenna extended. The correction has been made to the report – Additional SAR Information.

The corrected Additional SAR Information has been re-uploaded to AmericanTCB website.

- 3) Please provide a summary of worse case Head SAR value based on new testing, once item 2) above has been address..

Based on the new testing, as well as the original submittal, section 8, the highest measured SAR at head in the cellular band is 1.25 mW/g. The highest measured SAR at head in the PCS band is 0.860 mW/g.