



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

March 2, 2003

RE: Kyocera Wireless Group
FCC ID: OVFKWC-5135 (Permissive Change)

I have a few comments on the above referenced Application.

- 1) The schematic provided appear to show the MSM3100 instead of the MSM5105 specified by the cover letter for this application. Please explain.
- 2) The test report seems to present spurious test data following typical radiated methods such as ANSI C63.4 and then calculating TX power via far field equations. Please note that when the limits are given as ERP and in dBc ($40 + 10 \log P$) then the device must be tested following substitution methods specified in EIA/TIA 603. Please reference email interpretation from Frank Coperich that defined this policy provided in a separate attachment.
- 3) The conductivity measured in the SAR report for 835 MHz Muscle testing exceeded the 5% allowed tolerance. Note that Feb 02 and Apr 02 TCB training workshop notes report the update in IEEE Std 1528 that 10% tolerance applies only to dielectric constant not conductivity."
- 4) Please explain if the device may transmit with the flip lid closed.
- 5) The calibration for the Probe (ET3DV6) used in SAR testing does not include information regarding Body tissues. Please provide this information. (Note ConvF = 6.6,6.6, 6.6 for 835 MHz, 4.77, 4.77, 4.77 for 1900 MHz).
- 6) Dipole verification plots are missing for testing performed on 1/9/03 for 835 MHz. Please provide.
- 7) The values for conductivity and permittivity given on the plots appear to have many inconsistencies compared to the summary page in the SAR report for 835 MHz. Please explain.
- 8) Z-axis plots were not provide maximum SAR locations. Please provide.
- 9) Please report probe tip distance to phantom inner surface during scans.
- 10) Please provide a description of averaging (integration) procedures to get 1-g SAR from final interpolated grid.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.