February 02, 2005

Re: Kyocera Wireless Corp, FCC ID: OVFKWC-KE423, Assessment NO.: AN05T4489, Notice#1

To Chris Harvey:

Thank you for your feedback on the FCC application that has been submitted. Please find my responses to your questions below.

Question:

The Radiated Spurious Emissions and EIRP power measurements are to be measured using the Substitution Method of the EIA/TIA 603 standard. The test reports seem to document measurement methods that do not comply with the required measurement methods. Please provide compliance documentation using the correct Substitution Measurement Method.

Response:

The EIRP measurements were measured using a power meter while testing the phones in a calibrated fully anechoic chamber.

Question:

Additionally, the Radiated Emissions reports document this device as an FCC Pt. 24 Subpart D (Narrowband PCS) device, when this should state 24 Subpart E (Broadband PCS). Because the reports need to be updated for the above issue, please correct these typographical errors.

Response:

The typographical errors have been corrected and the radiated emissions tests reports have been revised. See attached reports.

Question:

It appears from the tabulated data that the SAR testing has been performed using only the model KE423 that has a Grayscale LCD. However, there are some SAR plots that indicate testing of the KX423 has been performed. The model KX423 uses a color LCD, which is a variant that, similar to a variation of battery architecture, would likely effect the SAR compliance (the LCD screen is against the cheek for the SAR test). Please provide additional justification of the reduced SAR compliance testing due to the 2 different LCD's or provide the compliance evidence of this optional LCD screen (KX423). Please note that there do not appear to be body SAR testing plots for the KX423.

Response:

Complete SAR testing has been performed on both the KE423 and the KX423 models. The SAR report that has been submitted summarizes the data from the model with the worse case values. Appendix B, contains the test evidence of the worse case SAR plots of each position for both the KE423 and KX423 models. The body SAR plots for the KX423 were unintentionally omitted from the original Appendix B report. An additional Appendix B-1 SAR report has been created to include the worse case body SAR plots for the KX423. See attached.

Question:

Please submit an antenna specification for the antenna provided with this device.

Response:

The antenna specifications are located in Section 2 "Equipment Under Test" of the SAR report:

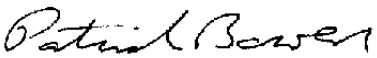
Antenna Type:	Fixed Stubby	**Antenna Location:**	Right/Rear
Detachable Antenna:	Yes	**Antenna Dimensions:**	22.9mm (L) x 9.5mm (W)

Additionally, the antenna gain may be calculated using the conducted and radiated test results in Section 6 " Transmitter RF Power Output". From these calculations the maximum antenna gain would be 2.07 dBi.

I hope the responses I have submitted answered all your concerns regarding filing OVFKWC-KE423.

Please contact me at Tel: (858) 882-1552 or Email: mailto:pbowen@kyocera-wireless.com if there are any questions or if any additional information is needed.

Kyocera Wireless Corporation



Patrick Bowen
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