Pat:

Your response fully addresses the remaining questions. Thank you.

Regards,
Roland Gubisch
Intertek

-----Original Message-----
From: Patrick Bowen [mailto:pbowen@kyocera-wireless.com]
Sent: Friday, December 19, 2003 2:26 PM
To: Roland Gubisch ES-Box
Cc: Danielle Fontaine ES-Box; cli@kyocera-wireless.com
Subject: RE: Re: Kyocera TCB Certification Application for FCC ID: OVFKWC -SE44

Roland,

Responses to questions in email below.

1. Please find the phantom liquid depth description in section "6.3 Tissue Stimulants" of the SAR Report.

The minimum 15cm depth of the liquid is verified by the test operator when preparing the SAM phantom for testing. A measurement device with markings at 15cm is used to ensure that phantom is filled with the proper amount of liquid prior to performing the validation and SAR measurements.

In addition, the z-axis scans are performed on the worse case SAR measurements to verify adequate liquid depth. See plots in Appendix B.

6.3 Tissue Stimulants
All dielectric parameters of tissue stimulants were measured within 24 hours of SAR measurements. The depth of the tissue stimulant in the ear reference point and flat reference point of the phantom were at least 15cm during all the tests...

2. The handset is not reversible in the holster. The mechanical design of the holster and the shape of the phone makes it so the phone is able to be positioned in holster in only one way. The phone locks into the holster such that the front of the phone is facing away from the holster. Please see section "11 TEST SETUP PHOTOS", figures 11.10 through 11.13 for a photo illustration of this statement.

Please let me know if you need any additional information.

Thank you.

Patrick Bowen

From: Roland Gubisch ES-Box
Sent: Friday, December 19, 2003 11:03 AM
To: 'Patrick Bowen'
Cc: Danielle Fontaine ES-Box; cli@kyocera-wireless.com
Subject: RE: Re: Kyocera TCB Certification Application for FCC ID: OVFKWC-SE44

Importance: High

Pat,

Thank you for the updated files and for your comments. Please address these final issues:

1) In the SAR test report I find no stipulation regarding proper phantom liquid depth and its measurement. Please comment.
2) Is the handset reversible in the holster? If not, please describe how reversing is prevented. If it is reversible, additional SAR data may be required.

Regards,
Roland Gubisch
Intertek

Date: Thu, 18 Dec 2003 16:28:12 -0800
To: Roland Gubisch ES-Box <roland.gubisch@intertek.com>
From: Patrick Bowen <pbowen@kyocera-wireless.com>
Subject: Re: Kyocera TCB Certification Application for FCC ID: OVFKWC-SE44
Cc: Danielle Fontaine ES-Box <danielle.fontaine@intertek.com>, cli

Roland,

Thank you for your feedback on the FCC application that I have submitted.

I have investigated the 835 MHz validation data and plot that was taken on 11/05/2003. You are correct. There was no testing performed on SAR for this date. Therefore, the validation data and plot for 11/05 is unnecessary for this application. I have removed the data for 11/05/2003 from the table in section 7 of the SAR report, and the plot from the Appendix A. Please see attached file for an updated PDF file of the SAR report with the corrections.

The lower SAR value of 0.106 mW/1g was not used in any uncertainty calculations. Removing the validation data and plot for 11/052003 does not affect any other information in this FCC application.

Thank you again for bringing this issue to my attention. Please let me know if you have any further questions or concerns.

Patrick Bowen

At 05:50 PM 12/18/2003 -0500, Roland Gubisch ES-Box wrote:

Patrick,

Good afternoon. Your application appears in excellent condition, and I appreciate the care with which it was assembled.

Review is not yet complete, but if there are no major issues a Grant of Authorization should be available tomorrow. Please comment on this observation:

The SAR report contains an 835 MHz system validation run performed on 11-5-2003, wherein the reported 1g/10g SAR values are lower by a factor of 10 than all other system validation results. This data appears in both the table in Section 7 of the report, and the plot of that date.

There do not appear to be any SAR compliance measurements performed on that date, and the subsequent 835 MHz SAR measurements of 12-10-03 are supported by a system validation performed 12-10-03 showing 1g/10g values consistent with expectation.

Please comment on the abnormal system validation results of 11-5-03, and whether or not they contribute to any SAR measurement errors. Additional questions may follow as the review is completed. Thank you.

Roland Gubisch
Intertek