Dear Dennis,

We will update the report to cover the 850 head tissue issue and models' difference , update the users manual accordingly, and upload them this morning.

I propose my explanation as follows. Please re-phrase it as the better one you think and then send it to FCC.

1. The 835 MHz head liquid we used for this device SAR testing is in the spec window. As you check the System Validation (App. A) of 835 head, it was found that its liquid parameters are correct. And the liquid for system validation and real SAR testing are the same.
   However, for the liquid parameters for 835 head testing, we wrongly quoted the liquid parameters of 835 body SAR. Under this condition, the re-testing is not necessary, but we will re-calculate 835 head SAR and update report.

2. For the model combination and single channel SAR testing issue:
   a). The certificated 4 models, 2203, 2204, 2205 and 2207, are the serial model of 2208. As described in the report, they all have the same RF chipset, the same RF board, the same antenna, the same antenna location, the same cover material, and the same cover size (length, width and thickness), the differences are keypad and minor shape change, so we tested the serial models based on the worst channel and position of 2208 because it was found through priliminary testing that the model 2208 was the worst case.
   b) The algorithm for choosing testing position and channel of GSM 850 is as follows:
      b1: The worst case for GSM 835 of 2208 is Left Cheek, so we chose middle channel of Left Cheek (LC) and Right Cheek (RC) to test 2205.(2205 is the device which has maximum output power)
      b2: The worse one between LC and RC is LC, so we chose LC to test its high and low channel.
      b3: The worst one of the three channels are middle channel, so we chose middle channel of LC to test another 2203, 2204 and 2207.
   c) The algothrim for choosing testing position and channel of PCS 1900 is as follows:
      c1: The worst case for PCS 1900 of 2208 is Left Tilted (LT), so we chose middle channel of LT and RT to test 2205. (2205 is the device which has maximum output power)

c2: The worse one between LT and RT is LT, so we chose LT to test its high and low channel

c3: The worst one of the three channels are middle channle, so we chose middle channel of LT to test 2203, 2204 and 2207.

Thanks a lot for the support.

BR
Daniel