

December 11, 2001

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Martin Perrine

SUBJECT: GTRAN Wireless, Inc.
FCC ID: PL5GPC-2100
731 Confirmation No.: EA102549
Correspondence Ref. No.: 21383

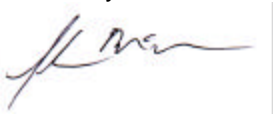
Dear Martin:

On behalf of GTRAN Wireless Inc. is our response to SAR items 2-4 of your e-mail dated November 29, 2001 requesting additional information for the subject application.

1. Attached is a new SAR test report to replace the previously filed report, with retested body SAR data using muscle tissue conversion factor. Please note that in the original test position the separation distance from the antenna to the planar phantom is increased from 1.0cm to 1.5cm using muscle tissue conversion factor.
2. Also included in the new SAR test report is test data for additional test positions to justify portable use, plus measured liquid dielectric parameters, liquid temperature, and Z-axis scan for the highest SAR location of each test. The following additional test positions were investigated using muscle tissue conversion factor:
 - a). Bottom of laptop PC with 0cm separation distance and antenna perpendicular to planar phantom.
 - b). Bottom of laptop PC with antenna parallel to planar phantom at 1.5cm separation distance.Please note that based on the new SAR test results it was determined that a 1.5cm separation distance must be maintained between the user/bystander and the device antenna, except when the laptop PC is operated on the user's lap then the requirement is that the antenna must be in the extended vertical upright position.
3. The depth of the simulating tissue in the planar area of the SAM phantom used in the SAR evaluation was no less than 15.0cm.

If you have any further questions regarding the above, please do not hesitate to contact me.

Sincerely,



Shawn McMillen
General Manager
Celltech Research Inc.
Testing & Engineering Lab

cc: GTRAN Wireless, Inc.
Nemko Dallas, Inc.