

November 9, 2001

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

**SUBJECT: Dowtelecom Inc.**  
**FCC ID: PUNDTP-1900**  
**731 Confirmation No.: EA102425**  
**Correspondence Ref. No.: 21195**

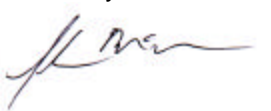
Dear Martin:

On behalf of Dowtelecom Inc. is our response to your e-mail dated November 7, 2001 requesting additional information for the subject application.

1. The power adapter was used during all tests with the battery installed. The use of the power adapter would generate the greatest supply voltage giving the worst cast scenario for both SAR and EMC. The external cable is positioned in such a way as to provide excess separation between the antenna and the cable itself.
2. The unit was tested using a Keypad access. The unit also has the option of using an external laptop computer to control the unit but was not used in the testing. The conducted power was measured at the antenna port and the AGC adjusted to achieve the appropriate maximum power level.
3. The CDMA signal was set in order to give full data transfer.
4. Since the unit's antenna was placed at  $3.0\text{cm} \pm 0.2\text{cm}$  from the surface of the RF transparent phantom surface, giving a total distance from the fluid to be  $3.32\text{cm} \pm 0.2\text{cm}$ , the use of a 2.0mm thick phantom would give a total distance from the fluid to be  $3.20\text{cm} \pm 0.2\text{cm}$ , a difference of 1.2mm. Since in the Measurement Uncertainty table in the report indicates, and is accounted for, an error in device positioning of  $\pm 6\%$ , and in the Body SAR Measurement Results Table an additional 12% was added to the total SAR values obtained to compensate for the uncertainty in the measurement, and due to the overall system uncertainty to be upwards of 25%, and since the EUT exhibits significant margin for SAR, a retest would not clearly indicate the change in expected SAR to be significant.
5. The unit is mounted with a sleeve dipole antenna in which the greatest current distribution occurs at the feed point of the antenna located half way up the antenna. Virtually no surface currents reside on the plastic chassis, and the internal PCB, which could in turn house surface currents, is located at least 3.0cm from the top surface of the unit.
6. Attached is the Z-axis scan data at the highest SAR location (Channel 25).
7. This device operates in the 1800MHz band and therefore 1800MHz parameters were used in the evaluation. The tissue parameters between 1800 and 2000Mhz are identical for both head and body.

We trust this information is sufficient to issue the grant immediately.

Sincerely,



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

cc: Dowtelecom Inc.