



November 16, 2001

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101
Attn: Bill Graff

**SUBJECT: Dowtelecom Inc.
FCC ID: PUNDTT-800
Part 22 Certification
Request for Additional Info**

Dear Bill:

On behalf of Dowtelecom Inc. is our response to your request for additional information dated November 14, 2001.

1. Justification for requested emission designator per FCC rule part 2.202:
2M + 2DK
CDMA BW = 1.25 MHz
F = Frequency Modulation
9 = Composite Digital Info
W = Combination (Audio/Data)
Emission Designator = 1M25F9W
2. The bandwidth settings listed in Section 3.3 of the test report were inadvertently submitted. Please note that both the resolution bandwidth and the video bandwidth were set to 3MHz for the test.
3. Please include the test setup photos and block diagrams in the application.
4. Please find attached the revised RF exposure warning statement for the users manual.
5. Please find attached MPE calculation data to replace the submitted MPE measurement report.
6. Please find attached the receiver emission test plot showing compliance with 22.917(f) of the FCC rules.

If you have any questions or comments concerning the above, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn McMillen". The signature is written in a cursive style and is positioned to the left of a vertical line.

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

cc: Dowtelecom Inc.

FCC RF EXPOSURE INFORMATION

Please read this information before use

In August 1996 the Federal Communications Commission (FCC) of the United States with its action in Report and Order FCC 96-326 adopted an updated safety standard for human exposure to radio frequency (RF) electromagnetic energy emitted by FCC regulated transmitters. Those guidelines are consistent with the safety standard previously set by both U.S. and international standards bodies. The design of this device complies with the FCC guidelines and these international standards.

Use only the supplied or an approved antenna. Unauthorized antennas, modifications, or attachments could impair call quality, damage the phone, or result in violation of FCC regulations.

All persons must be at least 20 cm from the antenna when the transmitter is operating and must not be co-located or operating in conjunction with any other antenna or transmitter in order to comply with FCC RF exposure requirements.

For more information about RF exposure, please visit the FCC website at www.fcc.gov

TEST DATA

EFFECTIVE RADIATED POWER OUTPUT MEASUREMENTS								
Freq. Tuned	EUT Conducted Power	Max. Field Strength of EUT (Vert. Pol.)	Dipole Gain	Dipole Forward Conducted Power	Max. ERP		Max. EIRP	
(MHz)	(dBm)	(dBm)	(dBd)	(dBm)	(dBm)	Watts	(dBm)	Watts
824.70	25.0	- 18.39	- 1.44	26.19	24.75	0.299	26.89	0.489
835.89	25.0	- 18.17	- 1.34	26.21	24.87	0.307	27.01	0.502
848.31	25.0	- 18.87	- 1.24	25.97	24.73	0.297	26.87	0.486

MPE CALCULATION

Maximum power density limit (S):

$$S = f/1500 = 824.04/1500 = 0.55 \text{ mW/cm}^2$$

$$\text{Max. EIRP} = 27.01 \text{ dBm} = 502 \text{ mW}$$

$$R = \sqrt{\text{EIRP}/(4)(\pi)(S)} = \sqrt{502\text{mW}/(4)(\pi)(0.55\text{mW/cm}^2)}$$

$$= 8.53 \text{ cm}$$

The manufacturer specifies a 10 cm minimum separation distance for RF exposure compliance.