SIEMENS COMMUNICATIONS, INC.

October 29, 2004

Federal Communications Commission Equipment Authorization Division Application Processing Branch 7435 Oakland Mills Road Columbia, MD 21048

Re: <u>Declaration of Electrically Identical Mobile Phone Models</u>

Dear Sir or Madam:

Pursuant to Part 2.924 of the Commission's Rules (47 C.F.R. 2.924), Siemens Communications Inc. hereby affirms that the **C71** handset series is electrically identical to and a variant of the **C66** handset series. The only difference being the **C71** has the software feature of PoC (push-and-talk over cellular). The models include **C71**, **CT71** and **CV71**.

If you have any questions or require additional information, please feel free to contact me directly at (858) 521-3382 or at the address shown below.

Sincerely,

Milton de Leon >

Manager, EMC/Antenna

Siemens Communications, Inc. 16745 West Bernardo Drive Suite 400 San Diego, CA 92127 Tel. 858-521-3200