

1.) Form 731 and the Test Report face page asks for a power output of 1.23 W. Please note that Part 22 power must be quoted in terms of ERP, and Part 24 in EIRP. Please correct.

Max ERP measured 732.8 mW
Max EIRP measured 811.7 mW

2.) Power Output measurements in Table 4.3 of Test Report vary as much as ½ dB from the values quoted in SAR report Test Results. Please review.

1900 GSM SAR values = 30.86, 30.85, 30.73
1900 GSM RTL values = 30.50, 30.57, 30.85

800 GSM SAR values = 29.41, 29.78, 29.74
800 GSM RTL values = 29.93, 29.94, 29.65

Please note: Section 2.2 Device Description in SAR report, Maximum Peak Output Power for product is 30.0dBm and 31.0dBm for cellular and PCS bands respectively. With nominals 29.0dBm and 30.0dBm for cellular and PCS bands respectively.

Section 6 Test Results in SAR report, values reported for FCC Certification are calculated to maximum output power. For example, actual SAR value @ 824MHz is 0.87W/kg with output power of 29.41dBm. The reported value of 0.91dBm would be for an output power of 30.0dBm.

Therefore, the variation expected in production is already factored to the reported SAR values.

3.) SAR values quoted in Manual on pp.1 do not match Test Results in SAR report. Please review.

When Body-Worn data is reviewed(attached), SAR values quoted on pp.1 of Manual matches maximum reported SAR Values

Page 1 of Manual: Head/Ear 0.91W/kg; Body-Worn 0.56W/kg
Page 6 of Head/Ear SAR report: @824MHz 0.91W/kg for 1g tissue model
Page 6 of Body-Worn SAR report: @1850MHz 0.56W/kg for 1g tissue model

4.) No body worn results are shown in SAR report, but Manual quotes body worn SAR values.

Mistakenly the Body-Worn measurements did not reach you. Please find attached SAR measurement results for Body-Worn.

5.) Please describe accessories which will be made available with this phone including battery options, holsters, leather cases and belt clips. The manual does not provide this information, however the Technical Description does.

Product will be launched with the following accessories:

Battery: BKB-193-1052
Carry Case: SXX 109 4705
Hands-free: RFL 501 25/03

Technical Description document is an internal document. Section 6 Appendix A shows all possible accessories under development for future consideration. This should not have been submitted. We have removed this section from the document, attached is the revised version.

6.) The plots in the SAR report Appendix 1 and 2 are nearly unreadable when printed on a black and white laser printer. Please supply plots with annotation that is readable.

Please view plots on color screen and/or print on color printer – contrast will be lost in black and white.

7.) Was equipment tested for SAR compliance with headset? Explain.

Yes it was, please see attached Body-Worn SAR report

8.) Are plots available showing antenna gain over frequency for the 824-849MHz AMPS band and 1850-1910 PCS band? This would be helpful in this evaluation. No gain available.

No, for FCC purpose, phone is rotated on X, Y, and Z planes and maximum radiation is recorded.

9.) Please provide necessary bandwidth information.

No measurement was calculated using Carsons Rule per 2.202, but from the 99% bandwidth measurement of 200kHz thus, 200KGXW measured.

10.) There seems to be quite a bit of difference between the lower and high channel power output [in excess of 4 dB] in both PCS and AMPS band edge compliance tests. Please explain.

They were referenced to ERP/EIRP not to conducted antenna power power levels.

800 GSM ERP= 28.14 dBm , lower band edge reference level=26.1 dBm
800 GSM ERP= 28.65 dBm , upper band edge reference level=26.4 dBm(initial ERP taken, plot not corrected to updated ERP)

1600 GSM EIRP = 28.13 dBm, lower band edge reference level = 28.1 dBm
1600 GSM EIRP = 29.09 dBm, upper band edge reference level = 29.1 dBm