RESPONSE TO THE QUESTIONS FOR FCC ID:PXITR-503-A2

1.) Supplement C of OET65 2001 states that "The temperature of the tissue medium during the SAR measurement should be within ± 2.0 °C of the temperature at which the dielectric parameters are measured." In the SAR report you state "ambient temperature of the laboratory was in the range 21.8 – 24.5 C." The temperature at which the dielectric was measured was 22.3°C. The variation exceeds this +/-2 °C limit. This can be due to many reasons, many of which are acceptable. This will not hold up certification, but please explain why the 2°C limit was exceeded.

According to Supplement C of OET 65, the temperature of the tissue medium is kept during the measurement within ± 2 °C of the temperature at which the tissue was characterized. This can be observed from tables 1 and 2. The ambient temperature, also reported, corresponds to the temperature of the chamber and not the tissue simulant. This temperature should be kept below 25 °C.

2.) The following pages of SAR report 503-11_body.pdf are blank – Pages 13, 17, 18, 20 and 25. Please explain why they are blank and/or provide the appropriate information that should be on these pages.

No information is missing from the report, the blank pages were created by word in the process of moving some of the figures.

3.) The following pages of SAR report 503-11_head.pdf are blank – Pages 25, 27 and 30. Please explain why they are blank and/or provide the appropriate information that should be on these pages.

No information is missing from the report, the blank pages were created by word in the process of moving some of the figures.

4.) Please note that while your report states that CDMA was not done for the 800 MHz cell phone, the levels of SAR for the 1900 PCS CDMA are close enough to the AMPS leves to bring question about the decision not to test CDMA. The power levels for the 800 and 1900 CDMA devices are close. This brings to question if the SAR level of the 800 MHz CDMA could also be close to the AMPS. This is not going to prevent approval, but it is recommended that you supplement the application with testing of the 800 MHz CDMA device.

According to Supplement C of OET 65:

"For devices that operate in multiple modes within the same frequency band, all modes with a maximum source-based time-averaged output within 1.0 dB of the mode with the highest output should be tested to demonstrate compliance."

Based on the previous statement AMPS and CDMA 800 share the same frequency band, and their respective peak output powers are 26.25 dBm and 23.8dBm. Based on the difference of 2.45 dB in their output power, CDMA 800 is not required to be tested since it would result in much lower SAR values.