

Sony Ericsson Mobile Communications (USA) Inc. 7001 Development Drive RTP, North Carolina 27709

February 11, 2003

American Telecommunications Certification Body Inc. 6731 Whittier Ave McLean, VA 22101

Attention: Equipment Authorization Branch

Subject: Response to FCC Comments for FCC ID: PXITR-G0702

Reference: Sony Ericsson Model T306

Dear Mr. Graff:

The attached pages contain responses to FCC comments concerning application for FCC certification of Sony Ericsson model T306 bearing FCC ID: PXITR-G0702. Please note that these responses are equally valid for model T316 bearing FCC ID: PXITR-G1202.

If you have any questions and/or comments, please don't hesitate to make contact.

Sincerely,

Pierre Chery Technical Manager, Type Approval Research Triangle Park, NC Tel No: (919) 472-1697 Fax No: (919) 472-6382 Pierre.chery@sonyericsson.com



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## Request for additional information - Dated 01/02/03 from FCC Martin Perrine

> Date of Original Email: 01/02/2003

>

> Subject: Request for additional information

> In regards to your recent TCB grant referenced above we kindly request > that you provide the following additional information.

> 1) Explanation of reference level in and details of setup for Occupied BW plots. Plots suggests a maximum power of approximately 20 dBm. Other documents suggests power of 29.2, and 30.1 dBm for 800 and 1900 MHZ respectively.

The test lab forgot to account for a 10dB pad in the RF path. This was the reason for the discrepancy. Please see attached updated bandwidth plots.

> 2) Clarification of the use of "SAR manual insert" under EAS exhibit 8. This statement could not be located in the user manual. Also, body-worn accessory language in the statement is not acceptable. It could be easily understood by a user to mean all SE accessories can be used. The language in the full user manual exhibit is acceptable for a body-worn statement.

Page 62 of user manual (EAS exhibit 8) states " A separate leaflet with SAR information for this mobile phone model is included with the material that comes with this mobile phone".

The included SAR leaflet is based on CTIA requirements. The SAR insert text language(including body-worn) is as suggested by CTIA and has been in use for a few years.

> 3) Confirmation that tested body-worn accessories contain no metal
> parts. Grant comments suggests this. Please revise grant comment
> accordingly.

Based on Supplement C(edition 01-01) to OET Bulleting 65, grant comment need not specifically address body-worn accessories metallic content or body separation distance for SAR tested accessories. Page 41 calls out examples of text and "1. For a product that has the potential to be used in a body worn configuration and has been tested



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and certified with specific accessory device(s):" The text to used is "For body worn operation, this phone has been tested and meets the FCC RF ... use of other other accessories may not ensure compliance with FCC RF quidelines".

Sony Ericsson therefore recommend the body worn statement on the grant be worded as similar to earlier certified products, where the text used was "...SAR compliance for body-worn operating configuration is limited to the specific belt-clips/holsters/accessories tested for this filing..." See for example FCC ID: AXATR-413-A2.