

**From:** Stuart Nicol  
**Sent:** June 12, 2006 6:03 AM  
**To:** Arthur Brennan; Dan Brooks  
**Subject:** ATCB Responses

1. Please note that the manual states that the use of this device is on the wrist or ankle. The manual does not appear to indicate any use worn on the body other than these locations. Please note that SAR testing was apparently done for body worn configurations as well as locations on areas such as ankles and wrists. As this device is not used in a body worn configuration other than wrist and feet/ankles, please explain the relevance of body SAR testing to this application (i.e. are there configurations not listed in the manual where the device can be worn on the body in other than wrist, hands feet? If so, please define these positions and please include some information in the manual.

At this time there is no methodology for the testing of SAR on the limbs, wrist, ankles, hands and feet. It is globally accepted that using a tissue composition for the body is an adequate way to demonstrate that the device complies and that by using the body tissue methodology we have demonstrated that we tested with a conservative approach to SAR requirements. We acknowledge that we could have demonstrated compliance with MPE and submitted data using this approach but it was a requirement that the device be tested completely to the appropriate SAR standards to gain a portable grant.

2. Please note that the manual states a max SAR for ankle worn configuration is 4W/kg. Please note that the report states the max SAR for this configuration was only .693W/kg. Please explain the inconsistency and please correct as necessary.

This is an error on the user manual and has now been corrected to reflect the actual physical measured SAR value. [Art can you please correct this and re-issue to ATCB]

3. Please note that TCBs cannot evaluate SAR for configurations using wrist, hands or feet (ankles). Please explain the relevance of this data in the TCB application.

The device has been tested using methodologies based on body SAR evaluations and the measured SAR has been gauged against the expected values for ankles, wrist and feet. We have not employed any new or unique methodologies for the evaluation of this device and as such feel that ATCB can review the data based on the accepted test methodologies as detailed in the reference section of the SAR report.

7. Please note that the power listed in the SAR report does not specify what kind of power is being listed. Is this conducted power or ERP/EIRP power. Please also note that conducted power must be within 0.5dB of that listed in the EMC report and within 3dB of the EMC report if ERP/EIRP is being used. Please provide information on which type power is being used for both part 22 and part 24 data.

This is a type error in the SAR report and based on the original Motorola data which was received from the client. The same device was tested for both SAR and EMC it is expected that the deviation will be less than 1%. The SAR report has been updated to reflect the results from the EMC/EMI assessments. [Art can you get the data from Dan and please update the SAR report. I have measured the conducted power here in China and the values are 31.4, 31.9 and 31.7 for the Cellular 850 band and 28.9, 29.1 and 28.9 for the PCS bands so please make sure that the data for both reports is similar]