



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

December 5, 2001

RE: Sony Ericsson Mobile Communications

FCC ID: AXATR-421-A2

I have a few comments on this Application.

- 1.) Please provide an FRN for this Applicant.
- 2.) Please provide an owners manual for this Application. Additional questions may arise as a result after review of this document.
- 3.) Error uncertainty analysis was not addressed in the SAR report.
- 4.) A boundary interpolation plot is required.
- 5.) Other than the 1400mAh and 750mAh batteries, were there any other accessories which may affect SAR values? It is unusual for Cellular phones to not have an earpiece or headphone.
- 6.) Please provide an "affirmative Statement of Compliance" for RF Exposure [47CFR 2.909]
- 7.) Please provide ESN attestation.
- 8.) Please provide Cellular System compatibility attestation [47CFR 22.933]
- 9.) Please identify distance of phone to phantom (excluding belt clip) for body worn operations.
- 10.) Please identify construction of belt clip(s) used with this device.
- 11.) Please provide information on probe response to TDMA signals.
- 12.) Was before and after RF conducted RF Power Output measurements performed after each run?
- 13.) Does the phantom conform to current recommendations of SCC-34/SC-2 and as described in IEEE P1528?
- 14.) The actual composition of ingredients used for the tissue material is required.
- 15.) A description of the dielectric holder and positioning procedures used to evaluate the highest exposure expected is required.
- 16.) A description of both the course and fine scan procedures and interpolation procedures are required.
- 17.) This device uses a unique antenna. It is reasonable to ask if this device was rotated and tested in three orthogonal planes.
- 18.) Transmitter radiated spurious data was only performed on the low channel. There is no problem with testing one frequency, but it must be a middle channel not a band edge. Please supply additional test data at mid-band. Since TDMA produced the higher ERP, it should be shown in TDMA in addition to AMPS.
- 19.) It is not possible to read the annotation on the Tx Spurs in Rx Critical Band plots.
- 20.) Ideally, TDMA signals should use the same 30KHz channels as AMPS. Please provide a TDMA Occupied BW with the AMPS mask on a 100KHz span. The annotation on the one supplied is unreadable.
- 21.) During temperature testing, was transmitter switched off during increments from -30 to +60? FYI: Only one mid-channel temperature test for AMPS and TDMA is required.

- 22.) Modulation limiting graphs are difficult to read. Please do not depend on color – these are legal documents where black and white always has preference. Show only 300, 1000, and 2500Hz. The audio input scale is missing from the deviation limiting plots. The annotation is difficult to read
- 23.) Rated system deviation for voice is misidentified. Correct deviation is 12KHz. This would affect results of modulation limiting. Please note that 12KHz is what you specified in your necessary bandwidth calculations.[22.915(b)]
- 24.) There is nothing in the report which identifies the lowest power setting of this equipment. Please provide conducted RF Pout data at lowest power setting.



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President and Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.