



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

February 19, 2002

RE: Sony Ericsson Mobile Communications

FCC ID: AXATR-422-A2

I have a few comments on this Application.

- 1.) TDMA Occupied BW plot measurement for Necessary BW is taken at the wrong interval. Reference should be to the 300Hz RBW plot, and not to the SA Reference Level. Please provide new measurement for plot on page 13 of 69 of EMC report. Correct Form 731.
- 2.) Radiated ERP in Table 5-1 does not match front page of test report or Form 731. Correct and revise as necessary test report and Form 731.
- 3.) Please provide deviation levels of all signals listed in 22.915(b). The Occupied Bandwidth plots appear to show insufficient deviation for some analog modulation modes.
- 4.) FYI: Voice + DTMF mode is not considered a standard modulation mode and is not required.
- 5.) FYI: Tx Conducted Spurious Emissions and Tx Radiated Spurious Emissions need not be repeated across both analog and digital modes. Worst case of each would be sufficient.
- 6.) There are two methods listed in the report for testing radiated spurious emissions: Section 8.1 on pp. 32 of 69, and the notation paragraph listed on pp. 35 of 69. Which is correct? Remove the incorrect section.
- 7.) FYI: Unmodulated AMPS bandedge plots listed on pages 38 and 39 are irrelevant. If desired, provide plots showing worst case deviation, but never unmodulated case.
- 8.) FYI: Table 9-2 in Section 9.4 is irrelevant to Part 22H.
- 9.) The test data for Audio Response plot and Audio Low Pass Filter do not correspond at 4KHz. Audio Response plot shows it to be down -4dB while Audio LPF plot shows this value to be -50dB. Please resolve. Check compander settings before performing this test.
- 10.) Please provide support for requested emission designators per 2.201 and 2.202. Use Carson's rule where appropriate.
- 11.) Plots provided in SAR report pages 8 to 16 are very difficult to read. Annotation is broken and unreadable when printed on even a high quality laser printer. Please provide better plots.
- 12.) EUT appears capable of functioning as a wireless modem when connected to a computer. If so, then is this device able to transmit high speed data using multiple time slots? If so, this would affect the total mean power and SAR probe response. Please address this issue.
- 13.) Has EUT been investigated as a computer peripheral?
- 14.) What additional documents addressing SAR procedure should accompany this device?

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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.