



16th February 2006

Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Class II Permissive Change Request to FCC Certified transmitter with
FCC ID: AZ489FT5844, iDEN i850, with WiDEN and MotoTalk.

Gentlemen;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its Class II Permissive Change Request to FCC Certified transmitter with FCC ID: AZ489FT5844.

An accessory is being added to the accessory portfolio for this transmitter. The accessory consists of an integrated ZigBEE (IEEE 802.15.4) transceiver, designed to plug into the Bottom Accessory Connector of the transceiver, be powered by the subject transceiver's battery, and be controlled via a JAVA application running on the transceiver for the purposes of controlling a toy car. The accessory operates at low power (rated at 1 mW) in the 2.4 GHz ISM band, and has been authorized under FCC ID: AZ489FT7020. It is possible that both the host transmitter and this accessory transmitter to operate simultaneously.

The RF Exposure performance of the host radio, with the accessory transmitter attached and operating, was evaluated in accordance with 47 CFR 2.1093 at Motorola's CGISS EME Laboratory in Plantation, FL. This required that the accessories' JAVA application be loaded and running on the host phone during the test, which in turn required that the phone be operated in its normal "subscriber" software mode. This mode differs from the "test" software mode normally used for RF Exposure testing in that not all possible modes of radio operation can be simulated. Specifically, the high duty cycle data modes can not be simulated. Neither does an appropriate base station simulator exist capable of enabling the phone to operate in the data mode for the purposes of this type of testing. For these reasons, the SAR data were collected in the normal telephone interconnect mode (33% duty cycle), and were then scaled to represent higher duty cycle modes of operation (e.g. WiDEN data at 76.1% duty cycle). This is an inherent limitation of the product's software design and the unique requirements of this accessory.

The transmitter's ISM band (Part 15, Subpart C) RF Exposure performance remains unchanged from that originally filed with the FCC. However, the transmitter's Part 90 RF exposure performance, while determined to be within FCC limits, exceeded those in the original filing.

However, since the performance data conform to FCC limits, this change meets the requirements of a Class II Permissive Change, in accordance with 47 CFR 2.1043. All other data on file with the FCC for this transmitter continue to be compliant.

Contact me at (954) 723-5793 if you require any additional information.

Sincerely,
/s/ Mike Ramnath (signed)
Manager, Regulatory Compliance
Email: Mike.Ramnath@motorola.com