



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

September 6, 2005

RE: FCC ID: BEJL600I_ATCB002749
Attention: Jay Kim

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the FCC ID label does not have the FCC ID number on it. Please provide a sample label with the appropriate FCC ID number placed on the label.
2. Please note that the FCC wants the separation distance for Body SAR listed in the manual along with the highest Body SAR level and the fact that body worn accessories must not contain metal. Please report minimum separation distance, the requirement for non-metallic body accessoriness and the highest recorded Body SAR in the manual.
3. Please note that while it appears you have listed Head SAR for the 800MHz and 1800MHz EU version in the manual, you have not listed SAR for the US 1900MHz version. Please explain and please provide the appropriate head and body SAR values. Please also make sure the include the distances as mentioned in item 2.
4. Please note that page 5 of the SAR report says the Duty Cycle (crest factor) for the device is 1. However, please note that GSM has a crest factor of 8 or 8.3. Please also note that the plotted data shows a crest factor / duty cycle of 8.3. Please correct the report to correctly show the appropriate crest factor for the device tested.
5. Please note that the power drift shown in the tables on pages 19 through 21 of the SAR report far exceeds the allowed 5%. In some instances it appears that the drift exceeds 40%. Please also note that the power drifts listed in the data plots do not match the power drift listed in the table mentioned above. Please explain and if necessary, please retest the device keeping the power drift within the allowed 5% drift.
6. Please note that depending on the responses to the above items, more questions and/or comments may arise.

Dennis Ward
<mailto:dward@AmericanTCB.com>

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.