

February 21, 2000

RESPONSE TO SAR QUESTIONS

(Correspondence Reference Number: 11297)

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Re: Application for Cellular/PCS Transceiver Certification (EA95638)

Kwok Chan & Joe Dichoso:

Purpose:

This document responds to questions on the submission for the IHDT5ZU1 (EA95638) application.

Description:

To facilitate the response to SAR questions, the following includes the original text and the highlighted response.

From: Joe Dichoso
jdichoso@fcc.gov
FCC Application Processing Branch

Re: FCC ID IHDT5ZU1
Applicant: Motorola Inc
Correspondence Reference Number: 11297
731 Confirmation Number: EA95638
Date of Original E-Mail: 01/04/2000

Please submit the reply to the following issues in the RF exposure info folder of the electronic file. Contact Kwok Chan at KChan@fcc.gov if you have any questions and send him an e-mail when you download the information.

Motorola, EA 95638 -

1. The users manual indicates this phone has a ear-microphone jack which may allow body-worn configurations using third-party accessories where SAR compliance cannot be ensured. The SAR report indicates this device is not shipped with any belt-clip or holster. Since SAR compliance for body-worn configurations has not been tested, it must be clearly indicated to users that device operations with third-party accessories for body-worn operations have not been tested and may not comply with SAR limit. Users must be cautioned to avoid operating the phone with a headset for body-worn configurations using non-tested belt-clips, holsters and similar accessories or placing the phone in pockets while it is transmitting.

Response: The IHDT5ZU1 product now includes a tested belt clip device. A supplemental SAR report has been submitted.

2. Alternatively, Motorola may choose to perform SAR tests to determine a minimum or acceptable separation distance to comply with SAR limit for body-worn operations using an air spacing between the back of the phone and the phantom. This will allow certain generic belt-clips and holsters without any metallic components, that can provide the minimum separation to be used with this phone for body-worn use. In this case, users must be cautioned about the minimum separation distance requirement for body-worn operations using generic belt-clips and holsters that do not contain any metallic component for satisfying RF exposure requirements, and body-worn operating configurations that do not satisfy these requirements may not comply with SAR limit and should be avoid.

Response: See #1 above.

3. Depending on choices of item #1 and #2 above, please revise manual to include the appropriate caution statement at a location in the manual that will be obvious to users. The statement should indicate the requirements are for FCC RF exposure compliance.

Response: The following is a part of the updated users manual safety information:

Safety Information

IMPORTANT: Read this information before using your wireless handheld phone.

Exposure to Radio Frequency Signals

Your wireless handheld portable telephone is a low power radio transmitter and receiver. When it is ON, it receives and also sends out radio frequency (RF) signals.

In August 1996, The Federal Communications Commission (FCC) adopted RF exposure guidelines with safety levels for handheld wireless phones. Those guidelines are consistent with safety standards previously set by both U.S. and international standards bodies:

- American National Standards Institute (ANSI) IEEE. C95. 1-1992
- National Council on Radiation Protection and Measurement (NCRP). Report 86
- International Commission on Non-Ionizing Radiation Protection (ICNIRP) 1996
- Ministry of Health (Canada), Safety Code 6

Those standards were based on comprehensive and periodic evaluations of the relevant scientific literature. For example, over 120 scientists, engineers, and physicians from universities, government health agencies, and industry reviewed the available body of research to develop the ANSI Standard (C95.1).

The design of your phone complies with the FCC guidelines (and those standards). For additional information concerning exposure to radio frequency signals, see the statement by the FDA at the end of this user guide.

To maintain compliance with FCC RF exposure guidelines, if you wear a handset on your body, use the Motorola-supplied or approved carrying case, holster, or other body-worn accessory. If you do not use a body-worn accessory, ensure the antenna is at least one inch (2.5 centimeters) from your body when transmitting. Use of non-Motorola accessories may violate FCC RF exposure guidelines.

Antenna Care

Use only the supplied or an approved replacement antenna. Unauthorized antennas, modifications, or attachments could damage the phone and may violate FCC regulations.

4. FYI - Section 5 of SAR report has analog and digital mode. This phone does not have analog mode.

5. FYI - Section 7 of SAR report indicates RMS, which should be root-sum-square. The numbers provided are root-sum-square.

Note: Maximum measured ERP is 255 mW, requesting for 250 mW ERP. Maximum conducted output is 288 mW, SAR performed at 260 mW (assume conducted). Output on grant should not exceed 250 mW ERP. Additional grant comments may apply for body-worn operations.

Kwok Chan

Contact Information:

Thank you for this special consideration. Please contact me by telephone at (847) 523-6167, by facsimile at (847) 523-2350, or by e-mail (A.Bachler@motorola.com), if there are questions or additional information needed concerning this filing.

Regards,

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