

**American Telecommunications Certification Body Inc.**

6731 Whittier Ave, McLean, VA 22101

June 4, 2003

RE: FCC ID: O6YUTS-618

Attention: Kathy Grzovic

I have a few comments on this Application.

1. Please provide a request for confidentiality letter. No documents may be held confidential on the FCC server without a letter specifically requesting which appropriate file is confidential.

Response: The request for confidentiality will be uploaded asap, I apologize for the delay.

2. Please note that the product specs state that the "Allowed value for occupied bandwidth" is 288kHz. Your emissions designator is 290KDXW. This appears to be larger than the allowed bandwidth from the product specifications. Please explain.

Response: Please see the revised report uploaded with this response.

3. Please note, licensed devices require a tune up procedure as part of the application. Please provide the tune up procedure for this device.

Response: The test/tune process is automated and done at the factory. It is done using a PC-based set up. The software for the test was provided with the reference design from Sanyo. Other than putting the phone into the jig and running a PC program, there is no process.

4. Please note that the 731 states the lowest frequency is 1896.65, yet section 2.2 of the revised report states the lowest frequency tested was 1893.65MHz. Please make all documentation consistent. Please provide a 731 and report with the correct frequency range for the device tested.

Response: A revised 731 Form has been uploaded with this response.

5. Please note that 24.232(b)&(c) (Power and antenna height limits) is a **peak** power limit, average or pulse averaging is not allowed. Please explain why you included duty cycle factors (crest factor) in the conducted power table on page 9 of the report.

Response: All references to average or pulse averaging have been removed from the report. Please see the revised report uploaded with this response.

6. Please note that 24.232(b)&(c) (Power and antenna height limits) is a **peak** power limit, not an averaged or pulse averaged limit. Please explain why you included averaged duty cycle factors (crest factor) in the EIRP table on page 13 of the report.

Response: All references to average or pulse averaging have been removed from the report. Please see the revised report uploaded with this response.

7. FYI – no response needed. Please note that while the Crest factor is important in the SAR report, it has no bearing in the EMC report. If the purpose of calculating the Crest factor in the EMC report is to provide justification for a crest factor other than indicated by the FCC, it is better to do so in a separate table apart from any power measurement data. You should remove all reference to the use of this factor from any and all data in the EMC report and, if desired, only provide the calculations for Duty Cycle as information justifying the crest factor.

Response: Noted.

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8. Please note that the power listed on the 731 and on page 1 of the report is incorrect. The 731 and page 1 of the report states 19.3mw as the EIRP power of the device. Please note that the 19.3 appears to be the power in dBm from page 13 of the report. The actual PEAK EIRP of the device is 85mw (19.3dBm). Please correct the 731 and page 1 of the report to reflect the actual peak power measured from the device.

Response: A revised 731 Form and a revised test report have been uploaded with this response.

9. Please verify if the addition errors in the table on page 13 of the report are due to decimal place round offs.

Response: The errors are due to rounding, and now are clarified to show the actual values used. Please see the revised test report uploaded with this response.

10. Please note that part 24 is PEAK EIRP, not averaged power. This means that all out of band emissions and band edge emissions must be in relation to the PEAK EIRP. In section 8.3 (Test Data) of the report you have used a duty cycle correction factor. Please explain. Also, please remove all references to measurements performed or calculated using a duty cycle correction factor to adjust the PEAK EIRP of this device (see items 5-6 and 7).

Response: The average and duty cycle correction factors have been removed, and plots demonstrating compliance have been included in the revised report uploaded with this response.

11. It is not expected that the power should be the same for all tests (i.e. output power of 19.3dBm in all reports and plots). Please verify that the output power was measured prior to each test and please provide the actual power measured.

Response: SAR testing is being conducted, and a revised SAR evaluation will be uploaded asap.

12. Please note that the plots on pages 21, 23 and 25 of the SAR report show power drifts greater than -0.9dB. This is about a 12.5% drift. Please note that IEEE1528 states that the maximum power drift is to be within +/-5%. Please provide a SAR report showing power drifts less than 5%.

Response: The EUT is presently being retested for compliant power drift results; a revised SAR evaluation will be provided asap.

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.