



Palm Inc.
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To: Mr. Tim Johnson, American TCB
From: David Waitt
Subject: FCC ID: O8FAOKI
IC: 3905A-AOKI

Date: 1 Sept 2005

This letter addresses your compliance concerns regarding the FCC & IC application for the Palm T|X.

If there are any questions or if additional information is required, please contact me at david.waitt@palm.com

On behalf of Palm Inc,

David Waitt
Sr. Regulatory Engineer
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ATCB: Please explain why section 1.4 of the newly provided report now cites EIRP. It was thought these were conducted measurements.

Palm: An earlier version of the report that had this "conducted vs EIRP" error was inadvertently uploaded to the site. The correct report, labeled Rev C has been uploaded.

ATCB: Your response to previous item 6 does not appear in compliance with 15.19. Note that 15.19 gives the option to place the DoC in the manual, but dictates the logo must still be on the device. Given the language in 15.19, it is uncertain how you can only place this in the manual.

Palm: Palm wishes to certify the device as a computer peripheral. Thus, not requiring the logo. The Report has been uploaded to the ATCB site.

ATCB: Please confirm for previous response to 16 that the end use device is not capable of BT and WLAN simultaneous transmission. If not, how is this controlled? Please note that if both transmitters can not transmit in the end user product simultaneously, then we agree that SAR is not necessary for the BT. However if the end use device is capable of simultaneous TX, then the FCC requires WLAN to be evaluated with both WLAN only and WLAN + BT.

Palm: The device cannot transmit on BT and WiFi at the same time. This is dictated by the "single threaded" nature of the Palm OS and its inability to "control" both transmitters at the same time.

4) We understand your concern regarding power. However, the 14.92 dBm measured power appears to be lower than simply a variance (which is typically on the order of < 1 dB) which suggests either a reasonable explanation or an artificially low sample. Many times this difference may be accounted for simply due to difference in methods used by OEM manufacturers vs. applicant to make the measurement or sometimes is explained because of the measurement point may be behind a few components vs. directly off the board. Is there a reasonable explanation for the lower power in this case or has any comparisons been done to actually determine the variance is much lower than 1 dB and the measured power is at highest expected power?

Palm: Note that the manufacturer specifies the MIN to MAX tolerance of the product from 12.5dBm to 17 dBm, a 4.5 dB window. The manufacturer also specifies the typical power output at 14.75 dBm. Given this, our measured Pout is only .17dB from what the manufacturer specifies as typical.

Additionally, given the low measured SAR of the device, it would appear SAR is not a concern.

The maximum measured SAR is .17 w/Kg. @ 14.92dBm

The maximum possible output power is specified at 17dBm, this is 2.08 dB above the power level of the unit that was tested.

If the measured SAR value of .17 is scaled up by this 2.08 dB, the resulting sar value is .274W/Kg. This calculated SAR level of .274 is still 7.6 dB below the SAR limit of 1.6