



Palm Inc.
950 West Maude Avenue
Sunnyvale, California 95085-2801

To: Mr. Stan Lyles, Stanley.Lyles@fcc.gov
Mr. Tim Harrington
FCC Equipment Authorization Branch

From: David Waitt

Subject: FCC ID: O8FJIMI Request For Additional Information.
Applicant: Palm Inc
Correspondence Reference Number: 30189
731 Confirmation Number: EA274518

Date: 22 Dec 2005

This letter addresses your compliance concerns regarding the FCC Class II Permissive change application to add co-located transmitter capability to the new Treo product.

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
David.waitt@palm.com

FCC 1) 1) Regarding reply to corresp. 30106 #8, please state RC and SO used.

Palm) : The RC used was RC3, the SO was SO2.

In the time since this testing was conducted Palm have measured the transmit power of the phone with RC3/SO2 and RC3/SO55, both in ALL UP mode and found the measured RF power to be exactly the same.

Measuring different RCs and SOs across the band in ALL UP mode, Palm has seen approximately a .1 dB variation in RF transmit power. Thus, in scaling up the measured SAR values in the SAR report by .2 dB to present a worst case SAR result, Palm has accounted for ALL UP power variations resulting from different RCs and SOs.

In the future Palm will continue to measure the conducted RF transmit power in different RC (1,2,34,5) / SO (02,09,055,032..) combinations and ensure that SAR is tested at the highest power level and will address these issues more thoroughly in future filings.