



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

June 14, 2002

RE: FCC ID: PXITR-503-A2

Attention: Pierre Chery

I have a few comments on this Application.

- 1 Supplement C of OET65 2001 states that "The temperature of the tissue medium during the SAR measurement should be within $\pm 2.0^{\circ}\text{C}$ of the temperature at which the dielectric parameters are measured." In the SAR report you state "ambient temperature of the laboratory was in the range 21.8 – 24.5 C." The temperature at which the dielectric was measured was 22.3⁰ C. The variation exceeds this $\pm 2^{\circ}\text{C}$ limit. This can be due to many reasons, many of which are acceptable. This will not hold up certification, but please explain why the 2°C limit was exceeded.
- 2 The following pages of SAR report 503-11_body.pdf are blank – Pages 13, 17, 18, 20 and 25. Please explain why they are blank and/or provide the appropriate information that should be on these pages.
- 3 The following pages of SAR report 503-11_head.pdf are blank – Pages 25, 27 and 30. Please explain why they are blank and/or provide the appropriate information that should be on these pages.
- 4 Please note that while your report states that CDMA was not done for the 800 MHz cell phone, the levels of SAR for the 1900 PCS CDMA are close enough to the AMPS levels to bring question about the decision not to test CDMA. The power levels for the 800 and 1900 CDMA devices are close. This brings to question if the SAR level of the 800 MHz CDMA could also be close to the AMPS. This is not going to prevent approval, but it is recommended that you supplement the application with testing of the 800 MHz CDMA device.

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.