



9th August 2006

Ref: US000129

To: FCC

BABT
Balfour House, Churchfield Road
Walton on Thames
Surrey, KT12 2TD
United Kingdom
Telephone: +44 (0)1932 251200
Fax: +44 (0)1932 251201

Direct Dial: +44 (0)1932 251230
E-mail: Tom.Twynam@babt.com
Website: www.babt.com

Overall Assessment Letter for the E28 Ltd Rainbow R2821

FCC ID: T6LR2821

I have reviewed the application and find it compliant.

The product is a GSM/PCS quad-band phone which supports 850, 900, 1800 and 1900 MHz frequencies. Only the 850 and 1900 frequencies have relevance to the USA. This product is a variant of the model R2811 filed under FCC ID: T6LR2811.

Please note the following points which were addressed during the assessment.

1. FCC Label

The original label drawing had an incorrect FCC ID for this model. A revised drawing was supplied showing the FCC ID above.

2. Product Similarity

A declaration of similarity was obtained that gives details of the exact differences between this product and the original product R2811.

3. Internal Photographs

The internal photographs supplied did not provided sufficient detail to enable the front and rear of the circuit boards to be examined. New photographs were supplied by the laboratory and the EMC report was re-issued to include these photographs.



4. Confidentiality

The original confidentiality letter was not addressed to the TCB. This was corrected and re-issued.

5. SAR report

No results were provided for what was the worst case mode obtained during the original product testing. Further tests were carried out in the GPRS body worn mode and the report re-issued.

6. User manual

The user manual was corrected to ensure that the SAR values were as measured following the re-test in the GPRS body worn mode.

7. SAR Checklist

In order to comply with the SAR review checklist a copy of the SARA2 system calibration data was supplied by the laboratory.

8. General

The product was tested for both Head and Body SAR.

The highest reported Head SAR for the product was 0.576 W/kg

The highest reported Body SAR for the product with 1.5 cms separation was 0.569 W/kg

I have reviewed the SAR using the FCC supplied Checklist.

I underwent the FCC SAR evaluation training at BABT in May 2006.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'T. Twynam'.

Tom Twynam
Principal Certification Engineer