PCTEST®
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February 4, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Mr. Martin Perrine

SUBJECT: Sanyo Electric Co., Ltd.
FCC ID: AEZSCP-62H
731 Confirmation No.: EA759383
Correspondence Reference No.: 21838
Request for Tech. Info.: 01/23/2002

Dear Martin:

Transmitted herewith, on behalf of Sanyo Electric Co., Ltd., is an amendment provided in response to the request for technical information dated January 23, 2002.

EMC:

1. Example: Channel 991 AMPS Mode 2nd Harmonic (1648.08 MHz) The receive analyzer reading at 3 meters with the EUT on the turntable was –85.8 dBm. The gain of the substituted antenna is 6.1 dBd. The signal generator connected to the substituted antenna terminals is adjusted to produce a reading of 85.8 dBm on the receive analyzer. The cable loss of the cable between the signal generator and the terminals of the substituted antenna is 1.0 dB at 1648.08 MHz. So 5.1 dB is added to the signal generator reading of –46.77 dBm yielding –41.67 dBm. The fundamental ERP was 25.273 dBm so this harmonic was 25.273 dBm – (-44.17) = 66.9 dBc.
2. Please find the attached plot showing compliance with Section 22.917(f).

SAR:

1. Please find the attached revised page of the user's manual with the corrected warning statement for body worn operation.
2. Please note that the antenna protrudes backward as opposed to straight up when extended, therefore, it was not possible to place the phone parallel with the phantom. During the body worn SAR test, we placed the phone in such a way to ensure that the hottest areas of the back of the phone were within 1.8 cm of the phantom. Please find the attached illustration of the body SAR test setup.

3. Please find the attached system validation information.
4. Please find the attached probe calibration data and certificate.
5. Since we had not yet installed the ventilation system for glycol safety issues, for PCS brain we used tissue with a higher conductivity than required by Supplement C. This led to an overestimation of SAR. The conductivity was 14% higher than the specified value, which is in direct proportion to the SAR value.
6. Please find the corrected data pages showing the proper distance between the probe and the antenna of the phone. Please note that the antenna is recessed back from the front of the phone, hence the 1.3 cm distance.
7. Please find the attached course scan data for both bands showing that the hottest area of the phone was tested.
8. We found no discernable difference between the standard and the extended battery during the ERP and EIRP tests. During the body SAR test, we used the extended battery first because of the closer distance to the phantom. Please note that we retested the highest channel again with the standard battery and obtained similar results. We tested the standard battery completely for brain SAR and tested the highest SAR channel again with the extended battery with similar results.

We trust this information is sufficient to issue the grant as soon as possible. If you have any further questions, please do not hesitate to contact us.

Randy Ortanez
President & Chief Engineer

cc: Sanyo Electric Co., Ltd.