

April 26, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Andy Leimer

SUBJECT: E F Johnson Company
FCC ID: ATH2425180
731 Confirmation No.: EA415028
Correspondence Ref. No.: 22720

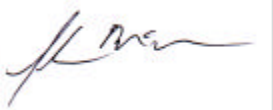
Dear Andy:

Submitted on behalf of E F Johnson Company is our response to items 1,2, and 4 of your e-mail dated April 26, 2002 requesting additional information for the subject application.

1. The fluid used for both 835MHz and 900MHz has the same composition of ingredients, and the resulting measured electrical parameters were within 5% of the requirements. Included on page 7 of the SAR report are the measured dielectric parameters for both 835MHz and 900MHz, and in Appendix E is a printout of the measured parameters.
2. It was determined at the time of the evaluation that since there was significant margin in the reported SAR values for occupational use, and the measured SAR drift on each test was $\leq 5\%$, that a retest was not warranted, even though the conducted values marginally exceeded the 5% in-house limit.
3. All SAR test data for this particular device was performed on February 01, 2002. At the beginning of the day for the SAR evaluation the ambient and fluid temperatures were measured and found to be approximately 23.9°C and 23.0°C respectively. Although the ambient room temperature is maintained fairly constant, slight variations can exist over the course of a day of testing, however changes in the fluid temperature will not fluctuate due to the large volume of fluid. It is therefore believed that the fluid temperatures reported on pages 3 and 4 of the SAR report are accurate for each individual measurement.

If you have any further questions regarding the above, please do not hesitate to contact me.

Sincerely,



Shawn McMillen
General Manager
Celltech Research Inc.
Testing & Engineering Lab

cc: E F Johnson Company
Rhein Tech Labs