



19th November 2011

Tim Harrington
Office of Engineering and Technology Laboratory Division
Equipment Authorization Branch
FCC Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA134502 with FCC ID: AZ489FT3824

Dear Mr. Harrington;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida, herein submits its response to the 27thOctober2010 for information in Correspondence Number 39260.

Q1) we note user man. pg 116 (.pdf pg 130) does not mention FCC ID of this filing - where appropriate please explain and/or revise

R1) This is an error in the user guide. Filing information is shown for APX7000. Page will be corrected as shown in attachment.

Q2) user manual mentions Bluetooth - please explain Certification status of Bluetooth, e.g. module FCC ID = xxxxxxxx and showing assoc. FCC ID labelling info; or please submit composite-application Form-731 eqpt. class DSS or DTS and contents to address BT certification under fccid AZ489FT3824

R2) Bluetooth functionality and circuitry being certified under a separate filing to follow with FCC ID: AZ489FT3929. Labeling information, certification information, etc are contained within the filing package within the said filing.

Q3) please explain how body-worn VHF transmit operations comply with RF exposure limits when used with optional Bluetooth earpiece/accessory, with TDMA modes and usage duty factor greater than 50 % etc, and/or revise user training and operating instructions as appropriate, etc

R3) As explained above that another filing will be forthcoming with Bluetooth.

Q4) internal photos show boards - further to 2.1033(c)(12) please revise or amend to also show full device internal construction, component placement, and chassis assembly

R4) Addition of Exhibit 10a, which contains an exploded view of the assembly with a detailed parts list. Please note Ex 10 is requested to be held Confidential by the FCC.

Q5) where not in filing already, please include callouts with photos etc to show Bluetooth component, antenna, chassis assembly

R5) The APX6000 model submitted for this filing does not contain a Bluetooth component or functionality.

Q6) cover letter has "Authorization & Evaluation Division" - fyi the FCC group handling this application is actually Office of Engineering and Technology Laboratory Division Equipment Authorization Branch

R6) The Cover letter has been revised.

Q7) grant freq. cover letter mentions part 90 typical operations - as appropriate please amend to explain also work-related occupational-only part 80 typical operations (marketing precludes recreational boating use etc)

R7) Cover letter amended to specifically limit use to work-related occupational-only and to include Rule part 80 and 90.

Q8) among the channel bandwidth and emission types supported by the device, if not in SAR report already please revise to describe what was used for SAR tests

R8) Section 12.5 of the RFX test report, first paragraph, has been revised to include the channel bandwidth and test mode.

Q9) SAR report has two body-worn accessories; if not in SAR report already please explain and/or revise to address compliance for "Carry Holder" shown in user manual

R9) User Manual was corrected to remove Carry Holder.

Q10) if not in SAR report already, please revise to tabulate device length/width/height and separately antenna length and diameter

R10) Ex 7B section 6.1 of the report will be revised to include the antenna picture/dimensions (length and diameter). Ex 7B also added section 6.5 to include the DUT picture/dimensions.

Q11) here and/or at minimum for all future filings for such as SAR table 8 for SAR eqpt please list cal. done date instead of or in addition to cal. due date.

R11) Table 8 of the report has been revised to include the "Calibration Date" for the test equipments used.

Q12) for 70% threshold SAR level mentioned e.g. at SAR sec. 12.5, if not in SAR report already please add note or footnote or biblio. citing FCC correspondence and/or discussions and/or KDB inquiries and specific date versions as appropriate for example, 7/15/10 FCC sent a testing guidance version to Motorola similar to what is presently webposted at OET-Lab Draft Review KDB page (www.fcc.gov/labhelp, DR KDB pub 643646); as appropriate that or similar should be cited as basis for testing done (FYI future filings for similar devices are requested to please apply latest version KDB pub 643646 methods & reporting format)

R12) Section 12.5 of the report, second paragraph, has been revised to include the FCC Correspondence Reference Number for the 70% SAR threshold level.

Q13) SAR cover page says 6.6 W max, whereas SAR lists powers up to 6.81 etc - in SAR report please include explanation for discrepancies and/or revise for consistency

R13) Section 12.5 of the report has been revised to include the following:

"Note 2: Typically, the device is tuned at the nominal power. For SAR testing purposes, the radio is manually tuned to as close as possible to the max power indicated for each band. The tuning capability of the software does not allow for exact tuning due to it is limited to step-sizes, and when the power is tuned for one

channel it is typically affects the adjacent channels. Therefore, the initial conducted power measurements, in some cases, are slightly above the stated maximum power but not to exceed that by more than 5% of the max power. "

In this case, the 6.81 watts is within the 3% of the max power of 6.6Watts

Q14) SAR table 10 probe cal date appears to differ from cert. in Appdx C - please revise as appropriate and/or explain

R14) Table 10 has been revised to correct the calibration date for the probe used.

Q15) for future filings at minimum please use SAR # test channels per KDB pub 447498 D01 v04 item 6), and with the minimum # based-on/within the approx. band qualified for FCC licensing, i.e. 150-174 MHz for device such as this.

R15) The formulas from KDB pub 447498 D01 v04 item 6 and IEC 62209-1:2005 were used to evaluate number of test channels for FCC part 90 frequency range (150.8 -173.4 MHz) and for the entire frequency range of this device (136-174 MHz). For FCC part 90 frequency range (150.8 - 173.4MHz), the IEC 62209 - 1:2005 formula indicated 5 test channels while the KDB 447498 indicated 4 test channels; For this filing, the lab has applied the IEC 62209 -1:2005 formula to assess this device since it required more test channels than the KDB 447498.

Sincerely,

/s/ Mike Ramnath (signed)

Manager, Regulatory Compliance

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