MOTOROLA

11th December 2003

Mr. Steve Dayhoff
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA245202 with FCC ID: AZ489FT4863.

Dear Mr. Dayhoff;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 5th December 2003 request for information in Correspondence Number 26056.

Q1) SAR report states power of 350 mW on page 5 of 21 and on the results section. Filing is for 50 mW device please clarify and correct.

R1) The maximum RF power of 350 mW indicated in the SAR report is the maximum conducted power into 50 Ohms taken at the antenna based on the production line final test station upper limit. The RF power listed on the FCC Form 731 of 50 mW is the radiated output power (EIRP) with a fully charged battery. The product has a non-removable integrated antenna and as such the radiated power is being used for grant purposes.

Q2) Please justify body tissue used. It appears to be outside the 5% target window.

R2) A 5% tolerance in tissue parameters has not historically been easy to achieve within the 2-3GHz frequency range using certain tissue simulant mixtures. According to Appendix C of FCC Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01) a 10% tolerance target is allowed in such cases. The tissue used for compliance assessment at the body at 2.4GHz for this filing was DGBE (Glycol).
Furthermore, IEEE 1528 section 5.3.1 part B allows for a relaxation to 10% tolerance on permittivity for simulated head tissue between 2-3GHz for certain conditions. Section 4.3.2 of the attached part 1 of 3 (Rev. B) SAR compliance report for this product contains updated language with regards to tissue parameter tolerance.

Contact me at (954) 723-5793 if you require any additional information.

Best Regards,
/s/ Mike Ramnath(signed)
Manager, Regulatory Compliance
Email: Mike.Ramnath@motorola.com