



1st December 2009

Diane Poole
Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA656397 with FCC ID: AZ489FT4886

Dear Miss Poole;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida, herein submits its response to the 30th November 2009 for information in Correspondence Number 38407.

Q1) Exhibit named "Ex8b RF Safety Booklet" mentions website (<http://www.fcc.gov/oet/fccid/>) - FYI this has changed to (<http://www.fcc.gov/oet/ea/fccid/>)

R1) RF Safety Booklet was corrected by removing the Weblink. See attachment.

Q2) Per 2.1033(c) (12) please amend internal photos exhibit to define chassis assembly, i.e. boards assembly etc within housing.

R2) Exhibit 9 attached was revised to include chassis assembly.

Q3) For SAR photos at 1.1 & 2.1, please identify also spacing between back of device and phantom (i.e. similar as what is shown in photos 1.2, 2.5, etc).

R3) Exhibit 7B was revised to include the requested spacing distances.

Q4) SAR appendices E & F mention scaling using KDB pub. 648474 procedures - please explain and give step-by-step example of application.

R4) Refer to response R5 below since KDB 648474 references KDB 45082 scaling which was used.

Q5) SAR sec. 5 mentions scaling using KDB pub. 450824 procedures - please explain and give step-by-step example of application.

R5) The recommended scaling used as outlined in KDB 45082 is the following;
" *Alternatively, the measured 1-g SAR may be compensated with respect to +5% tolerances in ϵ_r and -5% tolerances in σ , computed according to valid SAR sensitivity data, to reduce SAR underestimation and maintain conservativeness.*"⁹

An example of this scaling is from the overall highest SAR result reported on page 4 (Part 3 of 3). The measured tissue parameters at 422MHz were $\epsilon_r = 54.6$ and $\sigma = 0.90$. In this example the measured conductivity is -3.9% from the target (0.94) and therefore the measured SAR result was scaled up using the SAR sensitivity data provided by the system manufacturer (DASY 5 Manual).

Q6) Concerning SAR sec. 12.5 number of test channels, FYI future filings can use other formula given in KDB pub. 447498.

R6) No response required but FYI noted.

Q7) FYI future filings may request other or different info concerning SAR system verification below 300 MHz.

R7) No response required but FYI noted.

Sincerely,

/s/ Mike Ramnath (signed)

Manager, Regulatory Compliance

954-723-5793

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