



June 21, 2001

Mr. Richard Fabina
Chief
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Dear Mr. Fabina;

As conveyed verbally during our visit on 15 May 2001, Motorola discovered on April 26, 2001, through an internal quality audit in our distribution center at Plantation, Florida, that FCC ID labels had been misapplied to certain radios during manufacturing. Specifically, FCC ID "AZ489FT5772" was printed on the label applied to 352,000 radios, which should have been labeled with a different identifier as noted in Table 1 below. "AZ489FT5772" is the correct FCC ID identifier for the iDEN r370 and r470 product lines, which are no longer produced.

Table 1

Product Line	Correct FCC ID	Misprinted ID
i550plus	AZ489FT5792	AZ489FT5772
i700plus	AZ489FT5792	AZ489FT5772
i1000plus	AZ489FT5793	AZ489FT5772

The labeling error occurred because of the conversion on current products to an in-line label printing system using a computer database, which was programmed with the wrong identifier. In the past, each label variation was a specific part number on a production bill of material unique to each product, and the pre-printed label information was on the blueprint (under formal manufacturing revision control) used for parts procurement.

This new process had been introduced into the factories with the introduction of our new i85s product line in late March of this year. The first occurrence of mislabeling appears to have occurred on 28 March for the i550plus and i700plus product line units that were sent to our Plantation, Florida, distribution center from a contract production facility located outside the US. The first occurrence of mislabeling for the i1000plus product line units occurred on 12 April, and these were produced at an offshore Motorola production facility in Penang, Malaysia.

Upon discovery, immediate actions were taken to stop shipment, correct the in-line printing process computer database at all production facilities and our repair centers, and rework all 80,000 units still in the distribution center. The results were that 272,000 radios of the 352,000 mislabeled radios shipped and are in use at this time. Of that quantity 237,000 are in the US as

35,000 were shipped to foreign countries. Our carrier customers who received the erroneously marked units have been notified of this error, but, as noted, we believe the units are now in use.

The rework was implemented by marking out the incorrect identifier on the already attached label, then adding a smaller label listing the correct identifier, as shown in Figure 1. Radios that are returned to our repair centers for any reason in the future will be inspected, and reworked if incorrectly labeled.



Figure 1 – Distribution center reworked i1000plus (AZ489FT5793)

To reduce the possibility of future occurrences, the in-line label printing operation will be treated like our computer controlled in-line electronic testing process. Computer program data for printing on blank labels will be input from an engineering specification that is under formal manufacturing revision control. Thus, the label information will now be handled like the test limit data that are inputted into the manufacturing process for determining that phones have been correctly adjusted, a process that should prove to be far less prone to the sort of error that occurred.

One consequence of the mislabeling is that a user will not obtain any SAR information for their radio from the OET equipment authorization web pages if they input the erroneous FCC ID AZ489FT5772. This occurs not only because of the labeling error but also because of the fact that the grant for the erroneously applied number AZ489FT5772 was received prior to the implementation date of 47 CFR § 2.1093. Consequently, we respectfully ask that an entry be added at the OET web page for FCC ID AZ489FT5772 that would convey the correct FCC ID numbers to be used to obtain SAR information based on the contents in Table 1 and that would, in fact, include the maximum SAR information for the products to which the label was misapplied. A draft for this purpose is provided as an Attachment.

May 25, 2001

I appreciate the time that you, Mr. Nichols, and Mr. LaForge spent in meeting with me on this matter last week. Should you have any questions, please call me at 954 723-5539.

Sincerely yours,

/s/ Al Wiczorek

Al Wiczorek

Regulatory, Safety and Standards, iDEN Subscriber Group

cc: Messrs. Nichols and LaForge