

**MOTOROLA**

Date: August 17, 1999

Mr. Frank Coperich
Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Dear Mr. Coperich;

FCC ID: AZ489FT5794, Confirmation Number: EA94222, Correspondence Number: 8955

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response for the above Certification application.

1) There were two errors with the measurement data submitted for emission mask compliance leading to the apparent mask non-compliance. The first error was the zero dB placement of the mask was not aligned with the full power reference curve, and second, the mask slope lines were not positioned properly.

The measurements were re-done with proper mask placement on the same spectrum analyzer and the results are provided in attached Exhibit 6A, section 6.3, figures 6-1 to 6-4. No equipment modifications were made to achieve this performance. Thus, in spite of the errors in the originally submitted data, the equipment has demonstrated compliance to the emission mask of 47 CFR 90.210(g) for which Certification is desired.

2) The emission of this transmitter is known to not comply with emission mask 47 CFR 90.210(h) requirements for operation in the band 821 to 824 MHz, and we are not seeking authorization to operate in that band in the United States. Rather, what we seek is a letter of conformance as was provided by Mr. Fabina for product FCC ID: AZ489FT5792. That will facilitate authorization in foreign countries which apply the G and EA emission masks in the 821 to 825 MHz band.

In item 1 above Motorola has provided the radiated emissions data for 806 - 821MHz demonstrating that this transceiver complies with the FCC limits for emission masks set forth in both 47 CFR 90.210(g) and 47 CFR 90.691 (a.k.a. - the G and EA masks). Section 6.3 figures 6-5 to 6-8 in attached revised Exhibit 6A clearly shows that this equipment conforms to the G and EA masks over the band 821 to 825 MHz as well as the 806 to 821 MHz band. Also, the figure #'s have been updated in Exhibit 7.2.

3) The antenna gain numbers in the previously submitted EME report dated 7/19/99 were erroneously stated as 0.22 dBi in the extended position and -2.8 dBi in the retracted position. These respectively should have been stated as 0.33 dBi and -3.87 dBi, and are provided in revised

SAR report section 1.2 attached. Antenna gains in these SAR reports are listed in dBi for consistency with OET Bulletin 65.

Since this information also appears in the ratings summary in Exhibit 12.1, as well as the Effective Radiated Power table in Exhibit 6A, corrected versions of these exhibits also are attached. Maximum antenna gain is stated in dBD for this exhibit to clarify calculation of the maximum ERP rating.

4) SAR measurements were performed using both Motorola batteries (thick - kit # NTN8614A and thin - kit # NTN8615A) with the Motorola leather carry case accessory. The reported data per table 1 reflected only the combination resulting in the highest SAR (0.23 W/kg), which occurred when the thick battery was used (25 mm antenna to abdomen separation distance). The thin battery/leather case combination resulted in an SAR of 0.20 w/kg as a result of a 23 mm antenna to abdomen separation distance. The maximum calculated SAR values with either battery and this case remains compliant within the General Population limit of 1.6 W/kg.

The test results stated above involving Motorola accessories show that a separation distance of less than 1 inch does not preclude meeting the General Population SAR limit. The User Manual instruction to maintain a 1 inch antenna to body spacing provides conservative separation distance information should a user opt to use for body worn operation items other than those available from and tested by Motorola.

5) The Motorola leather carry case for body worn use is not sold with the radio; it's a separately sold accessory item, so the User Manual has been corrected accordingly to rectify your observation. An updated copy of the User Manual is attached as revised Exhibit 8.

6) This product is not marketed with any data mode features, and no means is provided for anyone to enter such a mode. Statements you observed in the preliminary User Manual were in error, apparently as a result of editorial oversight that occurred during its preparation as a revision of a manual provided with an earlier product which had data mode features. Attached Exhibit 8 eliminates the erroneous references to data mode operation.

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

Regards,

Mike Ramnath
FCC Liaison
Email: emr003 @email.mot.com