



Date: December 7, 2000

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

Re: Application for a Class II Permissive Change to Transceiver FCC ID: AZ489FT5801

Dear Mr. Coperich,

Motorola is filing this application as a Class II permissive change request in order to avoid any misunderstanding as to the effect of the condition language on the recent Grant of Equipment Authorization as it pertains to SAR compliance and the use of carrying cases.

Attached is a summary of the physical change and consequent effect on SAR performance data. Please note that the changes described in this request do not increase the measured SAR levels associated with the i2000plus.

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

Sincerely,

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

Attachment: Request for Class II Permissive Change, Ex. 3 (Rev. 1) and Ex. 12 (Rev. 1)**A. DESCRIPTION OF PRODUCT CHANGES:**

A new NTN9620 body-worn leather carry case has been designed for this radio product that will be marketed as well the similar NTN9247 leather carry case previously tested, as stated in the attached revised Exhibit 12. Due to the use of a different belt clip the separation distance between the radio product and a human user is different. Attached is a revised Exhibit 3 that contains a photo of the new case.

B. PERFORMANCE DIFFERENCES:

In Figure 3 of the SAR report previously filed for Exhibit 11 (dated September 29, 2000) a set of values for antenna-body separation distance dimensions was listed (as dimensions A, B & C) for the test configuration. The following table compares these distances for both cases, and it is clear that the new NTN9620 case provides increased separation.

Table 1 – Antenna to Body Separation

Dimension	NTN9620 (Additional leather case)	NTN9247 (Previously measured)
A	30 mm	25 mm
B	33 mm	30 mm
C	33 mm	30 mm

Further, measurements conducted with both cases showed that SAR was lower with the NTN9620 leather case as evident in the following table.

Table 2 – SAR Comparison

Mode	NTN9620 (Additional leather case)	NTN9247 (Previously measured)
Phone	0.25 W/kg	0.38 W/kg
Packet Data	0.51 W/kg	0.72 W/kg

All measurements were conducted at the A2LA accredited Motorola CGISS EME Lab/MFRL using the methodology described in the stated SAR report.

