



17th October 2001

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

Re: Form 731 Confirmation Number: EA102220 with FCC ID: AZ489FT5806.

Dear Mr. Coperich;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 12th October 2001 request for information in Correspondence Number 20890.

Q1). Confidentiality for Internal Photographs is not normally granted because the unit is available for examination after it is sold. Please modify your Confidentiality request accordingly.

R1). Attached is a corrected Confidentiality Request (Exhibit 13a) deleting Exhibit 9, Internal Photos.

Q2). Please clarify - Exhibit 12 states that the power output is variable over the range 1 - 3 W. However, Page 29 of the User Manual describes a high / low power output selection.

R2). The radio is continuously variable in power, however from the user perspective, as outlined in the user guide, the user has the capability of choosing a discrete high (3 Watt maximum) and low power setting (1 Watt minimum) which appears on the radio display. The high power or low power setting can be any power level between 1 and 3 Watts. The power settings, as requested by the customer, will be pre-set at the factory or the dealer prior to shipment to the customer. Please note that this radio cannot be programmed by the customer.

Q3). The Modulation Limiting plots you have submitted, Exhibit 6D, are not acceptable. Please send plots showing the transmitter deviation as a function of input level for several different modulating tones - per Section 2.1047(b).

R3). See the attached addendum to Exhibit 6, which contains the Modulation Limiting Plot that was requested.

Q4). Please supply frequency stability data for battery end-point voltage per Section 2.1055(d)(2). Your data in Exhibit 6J-2 does not cover this range.

R4). See the attached addendum to Exhibit 6, which contains the Frequency Stability Chart that was requested.

Q5). Multiple (4) batteries are indicated in Exhibit 12, but only one was tested during the SAR measurements. Please supply additional data for the remainder of the batteries.

R5). See the amended Exhibit 12, which now reflects the one battery chemistry tested as Ni-Cad.

Q6). Please identify the Accessory NTN1624A used in the SAR test, Page 17 or 20 and the Accessory NMN1624A used in the SAR test, Page 11 of 22. Also, please justify your choice of the various accessories for testing.

R6). A typographical error has been identified in the SAR Report Appendix A on page 11 of 22. The audio accessory is incorrectly identified as NMN1624A; the correct kit number is NTN1624A. The SAR Report (page 17 of 20) correctly identifies the audio accessory as NTN1624A. This audio accessory is described in section 3.0 of the SAR Report (page 6 of 20).

Section 5.0 of the SAR Report contains detailed descriptions of the test configurations and also states "All antennas, batteries, and accessories listed in section 3.0 were included in the SAR test plan in order to determine the highest SAR levels."

Regarding the audio accessories, Section 3.0 states: "Many different audio/push - to - talk accessories are available. They can generally be grouped into categories of 1) microphones, 2) earpieces, and 3) headsets depending on how they are used relative to the body. Representative samples were chosen as being typical within each group."

To further clarify, Motorola's standard practice for two-way radios is to complete all abdomen tests first with the Remote Speaker Microphone (RSM) audio accessory as described in section 5.0.1 of the SAR Report. A Remote Speaker Microphone is the most common audio accessory for two-way radio users. SAR test experience has shown that other audio accessory options present comparable or lower SAR results.

Q7). SAR report page 7 4.2:

What is opening width of "supporting non-metallic structure"? Loss-tangent of support structure may influence SAR distribution on device. Supplement C suggests flat phantom length and width should be at least 2x device length and width => opening width should be 2x device width, or supporting data should be given for other conditions.

R7). The opening width of the "supporting non-metallic structure" is 15.9 cm. The length of the opening is 61.0 cm. The supporting structure is a table made exclusively of wood with a loss tangent less than .05 at the frequency of interest. This is consistent with Supplement-C Appendix D requirements for loss tangent of the phantom and positioner. There are no metal connecting components associated with the structure. The structure is assembled with glue and wooden pegs.

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

Regards,
/s/ Mike Ramnath
FCC Liaison
Email: mike.ramnath@motorola.com