



Date: 4th January 2002

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

Re: Form 731 Confirmation Number: EA102585 with FCC ID: AZ489FT5811.

Dear Mr. Lyles;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the December 12, 2001 request for information in Correspondence Number 21472 and 21480.

The subject transmitter is intended for use in any computer (handheld or laptop) that accommodates the use of PCMCIA type 2 peripheral adapter cards, not just the specific commercially available models that were arbitrarily selected as the host computer for SAR assessment purposes. These units are Part 15 type devices that do not incorporate a RF transmitter.

We expect that radiated power measurement values will vary inversely with separation distance, as you have noted, only under the conditions of measurement in a specific configuration while installed in a specific host computer. We attribute the SAR measurement difference you cite primarily to implementation differences between the specific handheld and laptop models used as the host computer. In particular the plots on pages 17 and 18 of the SAR report show that in the laptop computer configuration radiation emanates primarily from the RF modem, with virtually none from the laptop computer. In contrast, the plots on pages 20 and 21 show that for the same antenna orientation (compared to Pages 18 and 17 respectively) a considerable amount of radiation now emanates from the handheld computer. This radiation redistribution effect can readily cause a lower SAR reading even with the 20% lower separation distance of 12 mm.

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

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