



Date: 5th July 2002

Authorization & Evaluation Division
Federal Communication Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Application for a Class II Permissive Change for derivative transceiver, iDEN Model i85s/i58sr, of FCC ID: AZ489FT5815

Gentlemen:

Motorola Inc, 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its request for a class II permissive change for the above multi-band voice and data transceiver.

New transceivers have been developed that are similar to models i85s and i55s authorized under FCC ID: AZ489FT5815. The i88s and i58sr models are derivatives that add a receiver that will receive and process signals from Global Positioning System satellites that operate in the GNSS band. To package this additional receiver circuitry in the same housing required circuit board layout changes and minor changes to the original RF circuitry.

Both of the new derivative models underwent radiated unwanted emission and human RF exposure evaluations. Degradation of some characteristics was observed so measurement data is provided in the associated attachments for those characteristics that exhibited degradation. Since the radiated spurious emissions exceed those originally reported by an amount greater than that attributable to measurement uncertainty, this change does not meet the requirements for a Class I permissive change. However, the performance data conforms to FCC limits, thus meeting the requirements for a Class II permissive change.

Part 15 compliance for operation as a computer peripheral was verified. A new Declaration of Conformity is provided in the user manual of Exhibit 8-1.

The SAR performance of this derivative radio product was verified by the A2LA-certified Motorola Plantation EME Laboratory and compared with the measurements on file with the Federal Communications Commission for FCC ID: AZ489FT5815. Within measurement uncertainty limits, the SAR values on file for measurements at the head and abdomen positions did not change. However, an increase in excess of measurement uncertainty limits was observed at the face position. An SAR report is provided as an attachment detailing the measured values. We affirm that this radio product continues to comply with the 47 CFR 2.1093 requirements for the uncontrolled environment.

Please contact me at 954.723.5793 if you require any additional information.

Sincerely,

/s/ Mike Ramnath

FCC Liaison
Email: mike.ramnath@motorola.com

Attachments:

- Exhibit 1A-1 General Information
- Exhibit 2-1 Statement of Certification
- Exhibit 3-1 External Photographs
- Exhibit 4-1 Circuit Description
- Exhibit 5-1 Circuit Diagram
- Exhibit 6.1-1 Transmitter power
- Exhibit 6.4-1 Radiated Spurious Emissions
- Exhibit 6.5-1 Frequency Stability
- Exhibit 7.1.a-1 Method of Power Output Measurement
- Exhibit 7.2-1 Radiated Spurious Emissions
- Exhibit 7.6-1 Measurement Equipment List
- Exhibit 8-1 User Instruction Manual
- Exhibit 9-1 Internal Photographs
- Exhibit 10.1-1 Semiconductor/Active Device List and Tune Up Procedure
- Exhibit 11-1 SAR Report