



Date: 7th April 2004

Steven Dayhoff
Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA132176 with FCC ID: AZ489FT5830.

Dear Mr. Dayhoff,

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to your 2nd April 2004 request for information on FCC ID: AZ489FT5830, EA132176 via correspondence number 26616.

Q1) User manual pg 121 has max SAR at ear = 1.05; SAR report has 1.06 - please explain and revise if appropriate.

R1) Please see amended page of the User Manual to reflect the max SAR of 1.06.

Q2)

- a) In future filings please indicate IEEE Std 1528 horizontal and vertical line definitions on device photo.
- b) SAR sec. 5 desc. is useful format - in future filing please consist to include sub-numbering in sec. 5 and corresponding row numbers in data tables

R2) Will try to implement items (a) and (b) in future submissions.

Q3) SAR setup Fig1 - is back of device flat against phantom, or tilted? What is spacing? What is significance of 2.5cm spacing to antenna?

R3) Figure 1 of the submitted report presents the test configuration of the overall highest S.A.R. result for this device. The device is tilted only to allow for the antenna to be positioned parallel to and separated 2.5cm from the phantom. The significance of the assessment with the antenna separated 2.5cm is to support Motorola's standardized user instructions for two-way radios which stipulates that if you are not using the device with an approved body worn accessory nor in its intended position in front of the face, ensure that the antenna and the device housing are kept 2.5cm from the body when transmitting.

Q4) In this and future filings, please submit purpose and parameter description for SAR shortened scan, also listing parameters used in full scans.

R4) Part 1 of 2 Section 7.0 of the submitted report explains the purpose of the shortened scan and directs the reader to the DASY cube scan outputs in part 2 of 2 APPENDIX A which includes test parameters of the measured shortened scans for the worst case test configuration at each body location. The representative normal scan information is provided as well.

The shortened scan was previously requested via FCC correspondence 22631, dated 4/16/02, by Martin Perrine, regarding FCC ID: ABZ99FT5000, in order to validate Motorola's reported compliance results that are scaled to the maximum power of the DUT. The following is taken directly from correspondence 22631.

4) Data to validate the calculation made to account for power drift. Please provide: a plot of conducted power versus time (at least 30 minutes) for each of the batteries, a "shortened " scan SAR measurement that focuses in on the hot spot and makes a measurement in minimal time. A measurement for the highest SAR point for body worn and held-to-face configurations should suffice. For reference purposes please repeat the original measurement to establish that the configuration is the same as previously reported.

Motorola submitted a response to FCC correspondence 22631 on 4/26/02. The initial grant was issued on 5/3/2002. Please reference the submitted response along with the associated attachment entitled "Shortened scan results" for the format that was accepted. Motorola has subsequently included shortened scan information in the accepted format.

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