

Date: 6th June 2003

Steve Dayhoff

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

Re: Form 731 Confirmation Number: EA519440 with FCC ID: AZ489FT7003.

Dear Mr. Dayhoff,

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its responses to the 28th April 2003 and 18th May 2003 request for information on FCC ID: AZ489FT7003, EA519440 via Correspondence Numbers 25112 and 25189.

Q1) Updated BW accessory statement. The statement "Use only Motorola approved supplied or replacement batteries, and accesso-" is not specific enough. Please refer to the specific accessories tested for compliance.

R1) The current accessory statement, which has been accepted by FCC for the past several months, serves two purposes: (1) it instructs consumers to use ONLY Motorola approved supplied or replacement batteries and accessories, the data for which FCC has reviewed and; (2) cautions customers NOT to use non-Motorola accessories and batteries because FCC RF guidelines may be exceeded. It is not desirable to "refer to the specific accessories tested for compliance," as FCC suggested. All Motorola approved batteries and accessories for this radio--whether approved initially by FCC at time of grant application or as after-market equipment through the permissive change and grant modification processes--comply with FCC requirements. We therefore respectfully renew our request to use existing user manual language.

Q2) New SAR report to

--remove results for non US bands.

--System verification performed in accordance to Supplement C procedures. Target values appear to be for head liquid while body liquid appears to have been used.

--SAR for worst case configuration with CW and with operating duty cycle signaling mode for validation of use of CW signal.

R2)

-Per agreement with Martin Perrine of the FCC, a revised report will be submitted that clearly indicates that the non-US frequency bands are not regulated by the FCC. The revised two part report entitled "FCC rpt_HDT600 BT_GPRS_WLAN_part 1of2_Rev A_030529.pdf" and "FCC rpt_HDT600 BT_GPRS_WLAN_part 2of2_Rev A_030529.pdf" is attached herein.

- Dipole validations from SPEAG using head simulated tissue are provided in APPENDIX D of the submitted report. The MFRL/CGISS EME labs validated the respective SPEAG dipoles to the applicable IEEE system performance targets. System validation was performed using FCC body tissue parameters to generate new system performance target values for body at the applicable frequency. The results of the MFRL/CGISS respective EME daily system performance checks as well as the new target assessment using body simulated tissue are provided in APPENDIX C of the attached revised report. Note: As indicated in APPENDIX C of the revised report attached herein, new target values for body at 900MHz and 1800Mhz were re-taken on 5/9/03 because the assessed new target for body taken during 2002 is missing at this time. A comparison of our

previous historical records regarding new target system validation for body at these frequencies suggests that the target values obtained on 5/9/03 are statistically ($p < 0.05$) the same.

- The unit was assessed in the applicable native transmission modes. Section 3.1 and section 5.0 of the submitted report incorrectly indicated that CW mode was used for compliance assessments. Based on the above information, Martin Perrine of the FCC, during a recent conference call with CGISS EME representatives, stated that the requested additional testing would not be required.

Correspondence Number: 25189

Q1) Updated BW accessory statement. The statement "Use only Motorola approved supplied or replacement batteries, and accesso-" is not specific enough. Please refer to the specific accessories tested for compliance.

R1) The current accessory statement, which has been accepted by FCC for the past several months, serves two purposes: (1) it instructs consumers to use ONLY Motorola approved supplied or replacement batteries and accessories, the data for which FCC has reviewed and; (2) cautions customers NOT to use non-Motorola accessories and batteries because FCC RF guidelines may be exceeded. It is not desirable to "refer to the specific accessories tested for compliance," as FCC suggested. All Motorola approved batteries and accessories for this radio--whether approved initially by FCC at time of grant application or as after-market equipment through the permissive change and grant modification processes--comply with FCC requirements. We therefore respectfully renew our request to use existing user manual language.

Q2) New SAR report to

--remove results for non US bands.

--new SAR data using 1900 MHz dielectric parameters. It appears that 1800 MHz parameters was used.

--System verification performed in accordance to Supplement C procedures. Target values appear to be for head liquid while body liquid appears to have been used.

--Consistent probe conversion factors page 32 and 33 of appear to use differing factors for the same configuration.

R2)

- Reference response to correspondence 25112 above.

- The dielectric parameters presented for the 1800MHz band assessment meets the FCC tissue target parameters for body for the frequency range of 1800-2000MHz as set forth in APPENDIX C of FCC Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01). The probe conversion factors used are applicable to the actual tested frequency for each assessment.

- Reference response to correspondence 25112 above.

- The same test position configuration was used. However, the frequencies being assessed were different. The probe conversion factors used were applicable to the respective frequency tested.

If you have any questions, please contact me at 954-723-5793.

Sincerely,

/s/ Mike Ramnath (signed)

FCC Liaison

Email: mike.ramnath@motorola.com