



Date: 15th December 2006

Gregory Czumak
PCTEST Engineering Laboratory, Inc.
6660-B Dobbin Road
Columbia, MD 21045

Re: Correspondence Number AZ40662 with FCC ID: AZ489FT7017.

Dear Mr. Czumak;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 5th December 2006 request for information in Correspondence Number AZ40734.

Q1. Please verify that the FCC ID label will be visible at the time of purchase (i.e., it will not be sold with the battery already installed).

R1. See the attached FCC Label justification letter and amended Exhibit 1.

Q2. Please address the following 4 requirements for frequency hopping spread spectrum transmitters (Bluetooth) from Section 15.247(a)(1):

- a. Is the hopping sequence pseudorandom? Yes
- b. Are all channels used equally on average? Yes
- c. Does the receiver input bandwidth approximately equal the transmit bandwidth? Yes
- d. Does the receiver hop in sequence with the transmit signal? Yes

R2. BT radio for HC700G has been certified by Bluetooth Qualification Lab. See the attached approval.

Q3. Please address Sections 15.247(g) and (h) for the Bluetooth transmitter.

R3. We comply to Sections 15.247(g) and (h) and BT and WLAN radios are hopping independently and randomly.

Q4. Please submit data for radiated emissions in the Restricted Bands for both the Bluetooth and WLAN transmitters on their mid channels (only hi and low channel data was included in the test report).

R4. See attached supplemental Test Report.

Q5. Is the Bluetooth capable of EDR mode? If so, please submit 20 dBc bandwidth and bandedge plots in this mode.

R5. The plots submitted are for this mode, the only mode of operation.

Q6. Please provide the following worst case SAR plots: 800 MHz band: RH touch and tilt, LH tilt; 900 MHz band: RH touch and tilt, LH touch and tilt, body; WLAN (2450 MHz band) body.

R6. Appendix A of this correspondence includes the additional SAR plots that you are requested. These are the coarse to cube scans (also called Motorola fast SAR for DASY4 evaluation method) as noted in the SAR report section 7.1 DUT Configuration(s): a coarse-to-cube approximation methodology was utilized to determine the worst-case SAR performance configuration for each applicable body location. The test configurations that produced the highest SAR results for each body position using the coarse-to-cube approximation methodology were assessed using the full DASY4™ coarse and 7x7x7 cube scans.

Q7. The 800 MHz LH touch SAR plot apparently used the conversion factor for body. Please recalculate this SAR level using the appropriate conversion factor.

R7. The scan has been corrected with the appropriate conversion factor for head and the SAR level has been recalculated. The results of the recalculated SAR level indicated that there is no change in the final results. The corrected plot for this scan is indicated in the revised SAR report (Rev. A) part 2 of 2.

Q8. The LH touch SAR test in the 800 MHz band was performed on 10/11/06. Please submit system check test results for this band (head) for this day.

R8. According to the FCC Supplement C, OET Bulletin 65- Appendix D (page 43), the system verification section indicated that "...a source operating within 100MHz of the mid-band channel of each operating mode may be used." The System Performance Check on 10/11/06 was done at the 900MHz which is within 100MHz from the center frequency of the 806-825MHz band. Therefore, the system performance check at 900MHz is applicable for both 800MHz and 900MHz bands.

Q9. We note that Qualitech is listed on the A2LA website as being accredited to ISO/IEC 17025 for calibration only. Please submit documentation showing that Qualitech has also been accredited to ISO/IEC 17025 as a test lab (the accreditation number on their A2LA logo does not match that shown on the A2LA website).

R9. See the attached A2LA Certificate.

Q10. Please note that in Section 6.2 (p.8/36) of the first SAR report, the values in the System Performance and Reference SAR columns are reversed.

R10. The SAR report has been revised to correct the information on this section.

Q11. FYI: page 7 of the first SAR report lists 2 dipoles as being past their cal due dates, however, the actual cal reports show otherwise.

R11: The SAR report has been revised to correct the information on this section.

Q12. FYI: the DoC logo, for the pc portion of the EUT, must be placed on the label.

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

Sincerely,
/s/ Mike Ramnath (signed)
Manager, Regulatory Compliance
Email: Mike.Ramnath@motorola.com