



19<sup>th</sup> February 2008

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

Re: Follow-up Correspondence Number AZ471050 with FCC ID: AZ489FT7031.  
Confirmation Number: 712181050-53

Dear Mr. Czumak;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 20<sup>th</sup> December 2007 request for information in Correspondence Number AZ471050.

- Q1. Regarding your answer to question #10 (DFS 30 minute non-occupancy test), the newest FCC requirements include requiring this test for ALL client devices (see the attached slide from the October 2007 FCC/TCB Workshop). Please perform this test, and submit the data. Please note that the FCC has Dismissed at least 5 applications in the past 2 months for failure to perform this particular test.
- R1. Exhibit 6 is revised. The requested tests were performed. The data is shown on section (see test report part 3) 2.4 test procedure (page 8) and 4.9 Dynamic Frequency Selection (DFS) plots 4.9.5 and 4.9.6
- Q2. Regarding your response to question #12, the 5.18 - 5.24 GHz RF powers for SAR (19 mW - 30 mW) vary significantly from the levels in the specifications and EMC results (39 mW). Please reconcile.
- R2. Further investigation revealed that the EMC data and factory setups use (d) a 20dB pad just prior to the power meter's sensor. The EME power measurements were taken without a 20dB pad. The EME lab re-measured the output powers for the 5GHz frequency bands reported in the EME report in order to be consistent with the EMC and factory setups. AN A-B test comparison was done with and without an additional pad (loss). In summary the 5.18-5.24GHz band showed a significant increase with the use of an additional pad. The remaining 5GHz bands only showed a delta as high as 3.9% with the use of an additional pad. 3.9% is within the power sensor's measurement uncertainty. Because the initial power measurement setup did not change the performance of the radio during the SAR measurement and the

delta of 3.9% for the middle and upper 5GHz bands the revised SAR report only reflects the new initial power measurements in the 5.18-5.24GHz band.

Please refer to the revised SAR report for the updated initial power measurements for 5.18-5.24GHz band.

The new initial power measurements did not change the final reported SAR results nor did it change the radio's performance during SAR testing.

- Q3. Regarding your response to question #13, the FCC has generally accepted SAR tests within manufacturer specified tolerances of calibration (i.e. above 0.3GHz, typically SAR needs to be measured within 100 MHz of calibration points). According to the SAR probe calibration certificate, the manufacturer has only provided CF's valid between 5.1-5.3 GHz and 5.7-5.9 GHz. Please provide a manufacturer statement (on manufacturer letterhead) stating acceptance of the calculation method proposed for usage of CFs for SAR measurements between 5.2 GHz and 5.8 GHz. Alternatively, you may wish to re-test with a SAR probe calibrated for the intended ranges.
- R3. Per your request the manufacturer has issued a statement confirming the the probe calibration rational that was used. Please see attached file CF022008.
- Q4. Regarding your response to question #14, please provide a description of the support equipment used in Part 15B testing (model/manufacturer and FCC ID/DoC for pc and second peripheral).
- R4. Exhibit 6 is revised. Please see test report Part 4 section 2.3. Configurations for measurements and section 5 Appendix B for Doc.
- Q5. Regarding your response to question #15, the new test reports for 15B, 15C (WLAN) and 15E do not include the required signatures, test procedures, test facility description, test dates, etc. (all listed in the opening pages of the Bluetooth test report). Please resubmit these reports, including this required information in each.
- R5. Exhibit 6 is revised respectively. Please see the enclosed test report (four parts)
- Q6. FYI: in the future, please be sure that the individual test reports only reference the applicable Rule Sections (e.g., the current 15B report references Sections in 15C and 15E, when it should only reference 15B).

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](mailto:Mike.Ramnath@motorola.com)