

Date: 4th February 2011

Office of Engineering and Technology Laboratory Division
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Response to FCC's Correspondence Reference Number 39472 for FCC ID: AZ492FT4896

Dear Stan and Tim:

Below are the responses to FCC Correspondence 39472.

0). Fyi in below SR8945 = car-mount MPE, SR8954 = bike-mount MPE

Q1). User manual pdf pg 13 of 142 has "6881095C98" for RF exposure instructions, while pg 3 has "6881095C99" - please revise for consistency where appropriate, or submit "... C98" version ("... C99" version is already in this filing).

R1). A revised manual is provided.

Q2) SR8945 pg 4 mentions 2.1091(d) and Gen. Pop./Uncontrolled, whereas elsewhere in report mentions Occup./Controlled limits and SAR limits - therefore for consistency should also cite 2.1093 maybe also 1.1310 same for SR8954

R2). RF Exposure reports were revised accordingly.

Q3). SR8945 pg 4 mentions ANSI/IEEE C95.1-1999, however fyi FCC rules cite ANSI/IEEE C95.1-1992 - please revise where appropriate same for SR8954

R3). RF Exposure reports were revised accordingly.

Q4). SR8954 is marked as such at pp 1-2, however is marked as SR8945 at the rest - seems inconsistent or incorrect, please revise where appropriate

R4). RF Exposure report was revised accordingly.

Q5). Concerning SR8954 sec 11.1 and Appdx A, for "60cm directly behind vehicle" please adjust Appdx A figure with call-outs showing specific distance from antenna to test location vertical axis, and for the specific bike show distance between closest metal structure at end of bike (e.g. rearmost point of fender, or luggage mount, or tag mount, etc) and the test location vertical axis

R5). RF Exposure report was revised accordingly.

Q6). Concerning SR8954 sec 11.2 and Appdx A, for "30cm from operators' seat area" please adjust Appdx A figure with call-outs showing specific distance from antenna to test location vertical axis, and from "edge" of "operators' seat area" to antenna

R6). RF Exposure report was revised accordingly in Appendix A with a new illustration.

Q7). Concerning SR8954 sec 11.2 "30cm from operators' seat area", please add text in report to explain how that reference condition is established for specific bike model and/or in general

R7). The enclosure that the antennas are mounted on determines specific antenna location which is 30cm from the edge of the enclosure. The operator cannot be any closer to the antenna than the edge of the enclosure. The enclosure is mounted behind the operator's seat. The installation manual, applicable to all motorcycle models, specifies the orientation of the enclosure such that there is 30cm distance between the antenna and operator. The following note was added to section 11.2 "Note; Motorola's weather proof enclosures provide 30cm separation distance from the antenna to the enclosure's edge. Refer to the installation manual for universal mounting options."

Q8). Concerning SR8945 sec 12.2, and SR8954 sec 11.2 with Appdx D, to support results test reports such as this generally need more details about test / reference conditions. For the sec 12.2, in the report at minimum please adjust the text, maybe also the Appdx A figure, to document what are "Head", "Chest", and "Lower Trunk" nominal heights / locations. For the sec 11.2 in the report at minimum please adjust the text, maybe also the Appdx A figure, to document what are "Head", "Chest", and "Lower Trunk" nominal heights / locations (as they are listed in Appdx D).

R8). SR8945, Appendix A was revised to include an illustration of the probe locations to the Head, Chest and Lower trunk areas.

SR8954, section 11.2 was revised to now include reference to the head, chest and lower trunk. Appendix A was revised to include the three test positions and their distances.

Q9). And for SR8954 sec 11.2, "scan" positions based on lower, mid, and upper one-third of antenna height for these nominal 15 cm and 10 cm antennas seems way too small (invalid) to cover exposure across head, chest and trunk - please revise text in report to clarify and/or revise test procedure and results where appropriate

R9). Data for the head, chest and lower trunk positions are now provided in table 7. Section 11.2 was revised to replace the 1/3 measurement points with the newly added head, chest and lower trunk measurements. Appendix A was revised to include the three new measurement (Head, Chest and Lower trunk) points along with their distances. Appendix D was revised to eliminate the 1/3 reference.

Q10). For SR8954 sec 11.2 "scan the lower third ..." to support results test reports such as this generally need more details about test methods; e.g. what is "scan" - for each height is it moving probe across some horizontal axis transverse to the bike long-axis, or what - please adjust text to explain specific procedures and details

R10). Section 11.2 was revised in accordance with the feedback from Q)9 and the term "scan" was removed.

Sincerely,
Mike Ramnath
/s/ Mike Ramnath (signed)
Manager, Regulatory Compliance
Tel: (954) 723-5793
E-mail: mike.ramnath@motorolasolutions.com

EXHIBIT 13a