

Date: 8th September 2011

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

Subject: Response to Correspondence Number 40272 for FCC ID: AZ492FT7045 with EA725943

Dear Stan:

Motorola, 8000 West Sunrise Boulevard, Fort Lauderdale, Florida, herein submits responses to the above correspondence dated 29th August 2011.

- 1) fyi the general policy for filings at FCC since approx. 1998 is that all licensed services are submitted in a single f-731; for devices having part 24 PCS operations the single equipment class is PCB (or PCE, etc) For FCC reference purposes, please explain your rationale for submitting composite f-731 PCB and TNB, in lieu of all exhibits under PCB as required.

Response: Looking back now, we should have filed all the exhibits using one Form 731 and one Equipment Class Description. When we filed prior filings our experience is that we encounter countless difficulties with up-loading the files and would have to engage the help of George Tannahill.

If we can rectify the issue and request the Equipment Class Description be changed to PCB and have all the exhibits under one Form 731. We are open to the FCC's recommendations on this issue.

- 2) RF exposure installation and operating instructions of the form typically used for part 90 private land mobile radio devices, with 50 % duty factor operations, do not seem applicable nor appropriate for device such as this Per OET Lab policy (KDB pub 447498, etc), occupational training and labeling are not required for devices that comply with the general population exposure limits - please revise filing accordingly.

Response: This product will be sold to Public Safety agencies. Also, it will be placed in the trunk of automobiles. Even though it meets or exceeds the FCC RF Exposure limit for the Uncontrolled Population Limits, Motorola chose to certify it to the Controlled Population Limits by adding the required User Manual language and RF Safety Label. We have since modified the RF Safety Guide, see attached.

- 3) op. desc. mentions "Gobi300" - we are aware of "Gobi3000", but not "Gobi300" - in case this actually uses Gobi3000, please revise op. desc and any other parts of filing where applicable.

Response: We have corrected the information in Exhibit 12 as attached.

- 4) For the part 15 intentional radiator portion of this composite f-731, external photos cites 2.1033(c)(12) - that is not applicable for part 15 - rather 2.1033(b)(7) is applicable - accordingly external photos must explicitly show antenna used for part 15 transmissions - please revise.

Response: Photo of antenna is enclosed as Exhibit 3a.

- 5) For the part 15 intentional radiator portion of this composite f-731, please document compliance with 15.203 unique connector requirements and the 15.204 requirement that only specifically authorized antenna(s) can be attached AND will be marketed with the transmission system.

Response: The Part 15 intentional radiator antenna (WLAN) requires that it be installed by a professional installer, who will be authorized by Motorola. According to 15.203, "Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with § 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded."

- 6) for the part 15 intentional radiator portion of this composite f-731, further to 2.1033(b)(4) please describe and show antenna radiating element construction details.

Response: Please see the attached WLAN antenna specifications including construction.

- 7) Please address compliance for 90.203(p).

Response: Motorola confirms that this radio shows support and complies with applicable sections of FCC Rule Part 90.203 (p).

Sincerely,



Mike Ramnath (signed above)

Manager, Regulatory Compliance

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EXHIBIT 13 R