



Shintom Co., Ltd.

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To: Federal Communications Commission

GRANTEE'S STATEMENT FOR MODIFICATION OF TRANSCEIVER, FCC ID: BFYM3047

This application is to ask for FCC's acknowledgment that the following modification made on Transceiver; FCC ID: BFYM3047 is acceptable as a Class II permissive change.

1. Detail description of the modification

- (a) Antenna element will be replaced with a new element.
- (b) The new element for antenna-out position is a little shorter than the current element.
- (c) Electrical operation of the new antenna is basically same as the current antenna's both for antenna -out and antenna-in positions.
- (d) Any portions of the transceiver except the antenna element will not be modified.

2. Performances affected by the modification

The following performances are expected to be affected by the modification.

The number shows applicable FCC rules.

- 2.1046, 22.913 Effective radiated power
- 2.1053, 22.917 Field strength of spurious radiation
- 2.1093 RF radiation exposure evaluation: portable devices

3. Original certification

- (a) Application document for the original certification shows following measurement results and alignment value for output power.

Conducted power output:

824.04MHz: 551mW
836.49MHz: 600mW (=27.8dBm)
848.97MHz: 478mW

ERP output:

824.04MHz: 631.0mW
836.49MHz: 676.1mW
848.97MHz: 676.1mW

Alignment value:

836.49MHz: 27.8dBm

- (b) Original certification was granted by FCC on April 19, 1999 with condition that the conducted power output for the power level 0 (maximum level) will be aligned to 27.2 dBm which is 0.6 dB lower than the alignment value described in the application document.
- (c) For all transceivers manufactured at the factory, the conducted power output has been aligned to 27.2 dBm.

4. Modified transceiver for measurements

- (a) The same transceiver (Serial No. 17400000736) which had been measured for the original certification was measured with the new antenna element.



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4. Modified transceiver for measurements (Continued)

(b) When measurements for Field strength of spurious radiation and Effective radiated power were executed at KEC (Kansai Electronic Industry Development Center), alignment condition of the transceiver were exactly same as the alignment condition for measurements made for the original certification, i.e. the conducted power output was 27.8 dBm.

(c) Before SAR measurement at 3D-EMC Laboratory, Inc. for RF radiation exposure evaluation, the conducted power output was realigned to 27.2 dBm.

5. Measurement results attached

EXHIBIT 5 Test Report of KEC (Kansai Electronic Industry Development Center)
Field strength of spurious radiation, and Effective radiated power

EXHIBIT 6 Test Report of 3D-EMC Laboratory, Inc.

SAR, RF radiation exposure evaluation for portable devices

6. Other information attached

EXHIBIT 1 Grantee's statement for modification of transceiver (This statement)

EXHIBIT 2 Photograph: Back view showing FCC label

EXHIBIT 3 Photograph: Back view -Antenna-out position

EXHIBIT 4 Photograph: Front view -Antenna-in position

Sincerely,

Yoshiro Fujimura
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