

October 25, 1999

Mr. G. Czumak
Engineer
FCC Application Processing Branch
Federal Communications Commission
Equipment Approval Service
P. O. Box 358315
Pittsburgh, PA 15251-5315

RE:: Submitting Additional Information Regarding Cellular Telephone Transceiver
FCC ID: BGBMT239XG01A
731 Confirmation No.: EA95200
Correspondence Ref. No.: 10221

Dear Mr. Czumak:

In accordance with your e-mail dated October 16, 1999, we wish to submit additional information.

1. **Field Strength / Maximum EIRP** – The calculated theoretical EIRP using the Friis Transmission Formula is 2.173 Watts. However, this formula assumes a perfect isotropic radiator.

We actually measured the radiated power of this device using the antenna substitution method at a 3-meter site. Please reference Exhibit 5, Sec. 5.2.2 for the data and calculation, and Exhibit 6, Sec. 6.1.2 for a description of the test method.

The maximum radiated power measured using the antenna substitution method was 0.971W for a maximum field strength reading of 128.6dBuV/m.

2. **Correct Emission Designator** – We have always based the emission designator on the necessary bandwidth, not occupied bandwidth noted in test measurements. Also, we reviewed the FCC application of many other Cellular Telephone Transceivers, and found their emission designators are not based on measured occupied bandwidth data.

Please reference 47CFR2.202.

However, if the FCC's policy regarding this has changed, please inform us, and we will revise the designator for this application and future applications.

3. Confidentiality Request – When we originally uploaded this FCC application, we noted which files should be considered “Confidential”. Pursuant to 47CFR0.459 of the Commission’s Rules, we request that the following information be withheld from public disclosure. This material is CONFIDENTIAL information, and contains trade secrets and details that would not be typically available to the public:

File	File Description	Exhibit Type	Exhibit
MT239EX12Aoper.doc	Technical Description	Operational Description	2
MT239EX12BOC.doc	Description of Oscillator and Synthesizer Circuits	Operational Description	2
MT239EX12C Sup.Lim.doc	Suppression of Spurious Radiation and Limiting Power	Operational Description	2
MT239EX12DMod.doc	Description of Modulation System	Operational Description	2
MT239EXC10ATune.doc	Tune Up Procedure	Parts Lists/Tune Up	2
EXC5ASCHEM.doc	Circuit Diagrams	Schematics	9

4. **Tissue Ingredients** – As stated in the SAR report (2.5 Simulated Tissue), the solution does not contain sugar or salt for high frequency data (1.9GHz); alcohol (diethylengTykol Monobutylether) is used in the mixture.

The approximate mixture to obtain the dielectric constant/conductivity of published values is as follows:

Water, 56%
Alcohol, 44%
Density was approximately 996Kg/m³

5. **Correct Spurious Emission** – Yes, you are correct. The spurious emission limit should be 82.2dBuV/m at 3-meters, not 84.4.

If you have any questions or require additional information, please contact me.

Sincerely,

R. Gruhlke
Director
Regulatory Liaison Division
RG/sst
Cc: MWCI, Mr. Ted Sims
Mr. S. Jung