

Oct. 30, 2000

Federal Communications Commissions

Attn: Mr. Frank Coperich

Re: FCC ID F3JMX1111

Applicant: Maxon America Inc

Correspondence Reference Number: 16737

731 Confirmation Number: EA98047

Dear Mr. Coperich,

This concerns our answer to your questions in the correspondence # 16737 of this application.

1. [Ultratech's Answer] Our following will make a clear comparison and explanation about small variation of the RF output power. In our opinion the rf output power measurements (at different times, different technicians, different measuring instruments and different dc voltage sources) are very accurate within 0.5 dB error:

Channel Frequency	RF Output Power @ FCC 22 test report	RF Output Power @ SAR test report wrt. Brain tissue	RF Output Power @ SAR test report wrt. Body tissue
824.975 MHz	27.0 dBm	26.5 dBm	27.0 dBm
836.4951 MHz	26.6 dBm	26.1dBm	26.3 dBm
848.9440 MHz	24.8 dBm	24.3 dBm	25.4 dBm

The measured rf output power is within 0.5 dB with different method of measurement because of the following reasons:

- The power measurements in the FCC 22 report were conducted with the EUT powered using the external dc power supply; therefore the RF output power was found to be more constant with the stable output power.
- The power measurements in, SAR test report with brain tissue, was conducted after SAR tests when the transmitter was left "ON" for a while and the transmitter was heated up; therefore, the power measured was found to drop about 0.5 dB. The EUT was power by the battery.
- The power measurements in SAR test report, with body tissue for use with the leather case, were conducted again before the SAR tests.

General Conclusion: The RF output power will drop lowered after a period of operations, and the SAR results can get lower but never be higher than those in the test report with brain tissue.

2. [Ultratech's Answer] The ERP in item #1 of the correspondence 15560 is ERP for CDMA mode per your request. The ERP for AMPS was provided to you in the earlier correspondence,
3. [Ultratech's Answer] The leather case can be rotated in 360 degrees. The photograph on page 16 of the SAR test report shows the worst case of measurement when the leather case part at the antenna location touches the phantom; this happens when a person sits down and the leather case/antenna part touches the body. In this configuration, the case is placed vertically relative to the body phantom (the body lying down), and the belt-clip is twisted angled allowing the leather/antenna part touching the body phantom.

The SAR test when the belt-clip is attached to the phantom and the antenna is in the vertical, parallel position with the body phantom is not the worst case of measurements since the leather case/antenna part will not touch the phantom.

SAR tests with the phone display faced inward the body is not practical since the phone is not intended for

operation in this way. The phone-display needs to face outward from the body so that the user can press the button and use it.

4. [Maxon's Answer] the words in P3.3 "specified by the FCC" will be deleted
5. [Maxon's Answer] This statement will be removed from the final User's Manual.
6. [Maxon's Answer] The "FCC RF Emission Guidelines" wording shall be changed to "RF Exposure Guidelines"
7. [Maxon's Answer] under P3.4 The blank will be filled with the model number for the leather case "MLC-1110"
8. [Maxon's Answers] The transmitter output power was checked with both batteries mentioned in the manual and the results were found to be the same. Therefore, the SAR tests were conducted with these 2 alternative batteries at the same tests; one battery was being used with the EUT while the other battery was being charged and vice versa.

Mr. Coperich, since it will take the manufacturer from Korea a long time to return to the US's office with the revised manual. The manufacturer would like to ask for your acceptance of the confirmation that the correction that will be made to the manual per your request without submitting the actual revised manual at this point of time. Please contact us if you have any more queries.

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