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FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road
Columbia, MD 21046
USA

Attention: Mr. Frank Coperich,

**Ref.: FCC ID: F3JMX1111, 731 Confirmation Number: EA98047
Correspondence Number: 17329**

Applicant: MAXOM AMERICA

Dear Mr. Coperich,

This concerns your questions and request in the correspondence#: 17329

▪ **Answer to your question number #1:**

- a) In fact there is no much change in the power at all as per our earlier explanation. The SAR tests were conducted with the same test sample and same type of battery (battery is fully charged). The variation of power measurement in within 1 dB error is considered to be normal due to accuracy of measurement method and thermal condition of the radio. I do not think that the rf power measurement can be always accurate with different time of measurements, there always be some uncertainty error.
- b) We used the tissue specified in "the Tissue Dielectric Properties CGI software, based on the 4-Cole-Cole Analysis in - Compilation of the Dielectric Properties of Body Tissues at RF and Microwave Frequencies by Camelia Gabriel" listed in the FCC's web site (<http://www.fcc.gov/fcc-bin/dielec.sh>) because the IEEE SC34 Draft (**Nov. 2000**) was not available at the time we conducted the tests. Now we have a copy and it will be referenced to this reference standard.

We wish you can accept the uncertainty of the rf output power measurements within this very reasonable error (from 0.5 dB to 1.1 dB).

The fact Maxon has been repeated this many time with us with the power reduction for compliance with SAR limits in the worst case. We would like to ask you to accept this power level for compliance with SAR test without further reduction of the rf output power and re-tests.

If Maxom has to reduce the rf output power, please advise how much power you suggest them to reduce, 0.5 dB or 1 dB? Is it necessary to repeat the SAR tests afetrreduction of rf output power.

▪ **Answer to your question number #2**

Our SAR test result submitted to FCC was the worst case after careful prescans with all possible orientations. After prescans it was found that the worst case is when the antenna tip touched the body phantom . The final measurements were than performed with the worst position. According to our test engineer's record, the highest SAR result with the leather holster flat against the body phantom is 0.299 W/Kg which is not the worst case since the antenna tip would not touch the phantom.



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▪ **Answer to your question number #3**

The answer for this would be the same as #2, after orientation the worst case was found is when the antenna tip touched the body phantom. If we placed the leather holster flat against the body phantom and does not matter which side facing to the phantom, the SAR reading is very low (highest is 0.299 W/Kg). Please consider our request for not repeating this configuration since it has already been pre-scanned and found that was not the worst case.

Answer to your question number #4

Customer will work on this with the manufacturer in Korea.

I know that the manual will be an issue to hold back the certification. But would you please respond to me with all concerns about the acceptance of our requests on items # 1 to #3. Thanks.

Your promptness regarding to this matter is very much appreciated since this application has been delayed for over 6 months and our client has been bearing lots of his patience with us. I think will be our history record of how long it takes.

Mr. Coperich, we wish you, your family and all of your colleagues at FCC a very merry Christmas and a very good year to come.

Tri M.Luu, P.Eng.
Authorized Agent
Ultratech Engineering Labs Inc.

