













3000 Bristol Circle, Oakville, Ontario, Canada L6H 6G4

Telephone (905) 829-1570 Facsimile (905) 829-8050

Website: www.ultratech-labs.com Email: vhk.ultratech@sympatico.ca Dec.14, 2000

FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road Columbia, MD 21046 USA

Attention: Mr. Frank Coperich & Kwok Chan,

Ref.: FCC ID: F3JMX1111, 731 Confirmation Number: EA98047

Correspondence Number: 17960

Applicant: MAXOM AMERICA

Dear Mr. Gentlemen,

This concerns your questions and request in the correspondence #: 17960

• Answer to your question number #1:

Attached in the "RF Exposure Info" folder please find the Applicant's confirmation that the RF output power setting at the antenna terminal shall not exceed 26.5 dBm for lowest channel frequency, 26.1 dBm for middle channel frequency and 24.3 dBm for highest channel frequency

Answer to your question number #2

Attached in the "RF Exposure Info" folder please find the prescan showing SAR plot of 0.299 W/Kg fort he "holster flat against the body "phantom.

In the 2D area plot, the center of the holster is specified as the reference point (0, 0) and the hot spot (-25, 0) is found to be located around the base of antenna when the EUT is inserted into case with the display faced outward from the phantom.

Answer to your question number #3

Attached in the "RF Exposure Info" folder please find the prescan to show various phone orientations in the leather holster to confirm that the reported SAR conditions represent the worst case.

It was found to be the worst case test configuration when the EUT was positioned on the head left ear (1.50~W/Kg at 824 MHz). The SAR illustration for the worst test configuration in section 5.4 was not relevant to the waist position but head left ear position. We did not test the EUT display faced inward to the phantom configuration on the waist since the SAR readings (0.355~W/Kg at 824MHz, 0.278~W/Kg at 836 MHz and 0.154~W/Kg at 849MHz) with EUT display faced outward from the phantom on the waist position, which were found to be quite away from its limit (1.6~W/Kg) for the general/population category, were much lower than those (1.50~W/Kg at 824 MHz, 1.23~W/Kg at 836 MHz and 0.89~W/Kg at 849 MHz) on the head left position.

Maxon (Applicant) would like to revise the user's manual to contain the following information for compliance with RF Exposure Requirements:

"WHEN USING WITH THE LEATHER CASE FOR BODY WORN OPERATION (MCLX-1111), PLACE THE PHONE IN THE CASE WITH THE DISPLAY FACING AWAY FROM THE BODY"

Please refer to Section 3.3 in the revised manual for details.















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Answer to your question number #4

Maxon has removed the incorrect statements form the users' manual as indicated in your correspondence # 167737, Questions 4 to 6. Please reviewed the revised manual.

Best Regards

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