

Date: 19 June 2008

Mr. Bruno Clavier  
TIMCO Engineering, Inc.  
TCB, FCC and Industry Canada Approvals  
849 NW State Road 45  
Newberry, FL 32669

Re: Job Number: 1245UC8 FCC Filing, with ID: IHDP56HJ1.

Dear Mr. Clavier,

Motorola Inc., 600 North US Hwy 45, Libertyville, IL, herein submits its response to your 19 June 2008 request for further information on FCC ID: IHDP56HJ1, in relation to Job Number 2831UC7.

Q 1. LABEL LOCATION: Please provide us with the required Label Location exhibit. We have found the label location in the external photos exhibit. However, we cannot upload the external photos in the "Label Location" folder on the FCC site because these photos were requested to be held confidential. EAS requires a separate exhibit with a photo or a diagram showing the location of the label for each filing.

**Response:**

*Exhibit 1* (attached) has been adapted to explicitly show the location of the FCC label. A graphic representation of the product is shown, so no confidentiality issues will apply.

Q 2. SCHEMATICS: It appears that the schematics for the RF portion of this device are incomplete. Also, the schematic for the Bluetooth transmitter is missing. Please explain or revise.

**Response:**

That was an unfortunate oversight. *Exhibit 5* (attached) has been updated to reflect the additional schematics.

Q 3. MODEL i365 and i365IS: This filing references two different models. It is not clear whether both models were SAR & EMC tested. It appears that one model has a 1/2 wave antenna and the other model has a 1/4 wave antenna. Please explain compliance with FCC SAR/EMC requirements for both models and please provide us with a brief description explaining the differences between models. Alternatively, please point out location of this info in filing.

**Response:**

The i365 and i365IS models are electrically identical, but for their antenna configurations. For the purposes of SAR and EMC measurements, both model types were evaluated and, where differences were noted, the worst-case data were presented.

Q 4. RF EXPOSURE – Simultaneous operation of Bluetooth and iDEN transmitter: Please indicate the location of each antenna on the internal photos and please indicate the closest separation distance between antennas. This information is needed to determine whether simultaneous operation evaluation is needed based on the new FCC KDB publication 648474 (SAR handset procedure and the related policy document). Table 2 contains relevant parameters.

“SAR not required:

Licensed & Unlicensed

- When the sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas
- When SAR to antenna separation ratio of simultaneous transmitting antenna pair is < 0.3”

**Response:**

*Exhibit 7b* has been updated to reflect the locations of the transmitters’ antennae. Taking the worst case SAR data from the RF Exposure report (*Exhibit 11*), and comparing them to the criteria of KDB648474, no simultaneous SAR evaluation is required. Specifically:

$$\begin{aligned} \sum SAR_{1.0g} &= (1.28 + 0.0041) \\ &= 1.284 W/kg < 1.6W/kg \end{aligned}$$

If you have any questions, please contact me at (847) 523-6167, or John Lewczak at (954) 723-6272.

Sincerely,

*Andrew J. Bachler (signed)*

FCC Liaison  
Motorola Mobile Devices Business  
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