



MOTOROLA

Date: May 4, 2009

Subject: Request for additional information regarding FCC ID: IHDP56KA1

Reference:

Correspondence Reference Number: IHD90473
Confirmation Number: 904210473-5
Date of Original Email: April 24, 2009

Prepared by:

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Questions and responses follow:

1. The following required documents are missing from the application. Please submit them.

a. BT Operational Description

Response: [Please refer to the Bluetooth Operational Description submitted online.](#)

2. What is the gain of the BT antenna?

Response: [The EIRP of BT antenna gain is +1.8 dBi](#)

3. Please provide RF conducted plots at 1 MHz removed from upper and lower bandedges (both bands) using RBW = 100 kHz (cellular band) and 1 MHz (PCS band).

Response: [Please refer to the EMC Supplement Response attached.](#)

4. The SAR probe calibration points (900 MHz and 1810 MHz) are more than 50 MHz removed from the measured bands. In accordance with the FCC [Application Note 450824 D01 SAR Prob Cal and Ver Meas v01r01](#), this situation

entails additional requirements for the tissue fluid parameters used during testing (see p.4/7 of the App Note). The cellular band tissue fluids used in the SAR tests do not meet the criteria set forth in the App Note (835H tissue conductivity not greater than target value). In accordance with FCC instructions given during the 4/14/09 TCB Conference Call, a KDB question must be sent to the FCC, along with the pertinent information and data, so that they may determine if additional testing is required. Please do so, and then, after following any instructions given to you by the FCC, submit their written (email) response to us, so that we may complete our review. It is suggested that, in the future, this procedure take place prior to submittal of the application to the TCB. Alternatively, cellular band SAR may be remeasured, using either a probe calibrated within 50 MHz of the measured band, or else using tissue fluids that comply with the more stringent requirements.

Response: The SAR measurements performed for the system verification were 10 MHz away from the probe's calibration frequency of 1810 MHz. This frequency separation is within the +/- 50 MHz specified in the SAR Probe Calibration section of the FCC Application Note 450824. Therefore, Motorola believes that no additional analysis is required for the SAR impact of the tissue dielectric parameters separation from the nominal targets. The routine SAR measurements for testing of the head and body worn configurations were performed at 1880 MHz. These tests occurred within +/- 100 MHz from the probe's calibration frequency. The tissue dielectric parameters used for these tests (given in section 4 of the original filing's Exhibit 11) do meet the criteria set forth in the additional step #2 on p.4/7 of the FCC Application Note.