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Supplement to SAR Test Report for Motorola portable cellular phone (FCC ID IHDP56LQ3)

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Summary of FCC request for additional information

There was a request for additional information regarding Motorola's SAR Test Report for Motorola portable cellular phone (FCC ID [IHDP56LQ3](#)). The requested information is addressed below in the same numbering sequence received.

- The GPRS and EDGE SAR data provided in the SAR test report is not sufficient for Class 12 capability. According to the conducted power data of Tables 4 and 5, cellular and PCS GPRS slots 2 & 3 and all slots for EGPRS require SAR test data. Please address.

Motorola Response: The conducted power levels indicated in table 5 demonstrate that GPRS 2 Txslots has the highest average power levels. This is the mode that was used for body-worn SAR measurements per KDB 941225 D03, "when multiple slots can be used, the device should be tested to account for the maximum source-based time-averaged output power."

- The rationale for stand-alone Bluetooth SAR testing provided on page 20 of the SAR report incorrectly explains that the output power of the Bluetooth transmitter is less or equal to Pref when in fact it is more than Pref according to the Bluetooth test report data. This being the case, then stand-alone Bluetooth SAR data is required per OET 648474 requirements. Please address.

Motorola Response: The measurements in the Bluetooth test report was performed using a peak detector. Conducted power measurements for SAR evaluation are performed using an average detector. Depending on the modulation of the transmit signal, the measurements with the average detector are typically 1 – 2 dB lower than those with the peak detector. The resulting Bluetooth conducted power levels used for SAR evaluation were below the Pref indicated in KDB 648474 and thus no SAR testing was performed.

- The FCC has stated that the inclusion in the SAR report of body SAR data for the front of the phone facing the body where the measurement separation distance is in excess of 5mm must be justified (e.g., in order to cover the potential situation where an accessory positions the phone with its front facing the user). Please revise the SAR report accordingly.

Motorola Response: Please see revised SAR test reports.