



MOTOROLA

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Applicant: Motorola Inc
Correspondence Reference Number: 27003
731 Confirmation Number: EA938292

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Questions and responses follow:

1) Please describe how the BT signal was controlled during testing.

Response: The BT transmitter was placed in a call and controlled with the following:

Agilent Wireless Connectivity Test Set
Model No.: N4010A
Serial Number: GB4410118

2) A body worn statement could not be located in the user manual. Please located or update the manual as appropriate.

Response: In addition to the user's manual, a separate safety booklet is now included with the product. Please refer to exhibit 8A, *IMPORTANT SAFETY AND LEGAL INFORMATION* booklet, submitted on 6-21-04.

3) Please summarize any collocation operations between the dominate transmitter and the BT. Describe how SAR was address for these conditions.

Response: The phone is capable of simultaneous transmission of a GSM/GPRS mode and Bluetooth mode. The intent of the simultaneous transmission is to maintain: (1) a GSM call while connected to a Bluetooth accessory – such as a Bluetooth headset, or (2) a GPRS connection while connected to a Bluetooth accessory – such as a handheld PDA. In both of these conditions the phone is intended to be positioned in a body-worn configuration. For SAR evaluation the body-worn tests were performed only in GSM or GPRS mode, and then the tests were performed again using the GSM or GPRS as the primary transmitter and the Bluetooth collocated transmitting. This was to determine if the Bluetooth circuit and RF energy had an impact to the measured GSM SAR.

The phone is also capable of using Bluetooth as a primary transmitting mode, without any GSM/GPRS transmitting. For this mode, SAR measurements were performed with the phone in the head and body-worn positions with only the Bluetooth transmitting.

4) Please provide SAR values for all SAR peaks in accordance with Supplement C recommendations for multiple peaks conditions.

Response: Motorola believes that if the mass average SAR of the primary peak is 6 dB or more below the regulatory limit secondary peaks need not be considered. The rationale for this value can be found from IEEE 1528. In IEEE 1528, 0.4 W/kg (1-gram average) is the lower limit for system validation. It is also the lower limit for assessment of ambient noise and for the uncertainty budget. Since SAR values below 0.4 W/kg are considered by IEEE 1528 to be so low that they are not considered for uncertainty assessment or system validation, Motorola EME laboratories consider these values to be low enough that secondary peaks do not need to be considered.

5) Many plots and figures did not appear to be included in the provided SAR report. Please review the exhibit and update as necessary. In particular please see the overlay figures and the contour plots for the dipoles.

Response: The initial submission of the SAR report was compressed for compatibility with Adobe Acrobat version 6. On June the same report. was recompressed with Adobe Acrobat version 5 compatibility and resubmitted. Tim Harrington confirmed that all graphics were now viewable.