



MOTOROLA

Date: March 18, 2008

Subject: Request for additional information regarding FCC ID: IHDT56JE1

Reference:

Correspondence Reference Number:	IHD80102-1
Confirmation Number:	802120102-4
Date of Original Email:	March 11, 2008

Prepared by:

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Questions and responses follow:

1. The application does not comply with the FCC's new Handset SAR requirements (see attached), released during the recent TCBC Workshop. It is not clear whether, in this application, simultaneous SAR measurements (BT and CDMA) are required, if stand-alone BT SAR measurements are required, or if the BT is exempt from SAR measurements altogether. Please submit an internal photo of the EUT, showing the location of the BT and CDMA antennas and the distance(s) between them. Please compare the BT conducted output power to Pref (from the new requirements), and, in conjunction with the antenna separation distance, determine the level of SAR testing required for the BT transmitter. Please submit this information.

Response: This device does allow simultaneous transmission between BT and CDMA. Because of the close proximity of the intentional and other unintentional radiating structures, stand-alone BT SAR measurements were performed in the configuration that resulted in the highest SAR value during the stand-alone evaluation of the dominant transmitter. The SAR results from the BT and the CDMA measurements were summed together and shown to be less than the 1.6 W/kg (1g) SAR limit. Please refer to the revised SAR test report (JE-EX11 revised) attached.

2. If so required by the results to question #1 above (i.e., if simultaneous SAR is not required, based on antenna separation distance and output power), please remove all references to the BT from the SAR report and resubmit it. If stand-alone BT SAR testing is required, please include that data and the supporting information by which it has been obtained.

Response: Please see revised SAR test report for additional BT SAR data.

3. If so required by the results to question #1 above, please modify the maximum SAR levels listed in the user's manual and resubmit it.

Response: Please see revised SAR test report for updated summation SAR results. Please note, because of the extremely low BT SAR results, the highest SAR value, reported in the user manual, has not changed.

4. Please submit the RF Block Diagram, including all of the clocks/oscillators, as required.

Response: Please refer to the revised Exhibit 4 attached where the clocks/oscillators are included.

5. Please submit internal photos of the EUT with the RF shields removed.

Response: Please refer to the revised Exhibit 9 attached showing EUT without RF shields.

6. Please provide plots showing bandedge compliance for the Bluetooth transmitter in EDR mode.

Response: Since this device does not support EDR mode, the information requested here is not available.

7. Please address the 4 points of Section 15.247(a)(1) applicable to the Bluetooth (Frequency Hopping) transmitter.

Response: This device contains an embedded Bluetooth device that Motorola confirms compliance with Section 15.247(a)(1) regulations. Please refer to the revised Exhibit 2 attached.

8. Please address Sections 15.247(g) and (h) for the Bluetooth transmitter.

Response: This device contains an embedded Bluetooth device that Motorola confirms compliance with Section 15.247(g) and (h) regulations. Please refer to the revised Exhibit 2 attached.

9. Please note that currently under 20.19, the HAC scope is not applicable under Part 27. The FCC requires that test data not applicable to the requirements is not to be submitted, therefore you will need to remove all AWS HAC data from Exhibit 6B-1 and 6B-2, while still including the full description of the handset in the test reports. Example text to add in the report can be:

- HAC evaluation was only performed for CDMA in the 850 and 1900 bands.
- 1700 band under part 27 was not done since the current rules under 20.19 do not address this today.

Response: Please refer to the revised HAC reports attached based on your requirements specified here.