



MOTOROLA

Date: April 27, 2009

Subject: Request for additional information regarding FCC ID: IHDT56KP1

Reference:

Correspondence Reference Number: IHD90202
Confirmation Number: 903030202-4
Date of Original Email: April 17, 2009

Prepared by:

Andrew Bachler, Principal Staff Engineer
Motorola Mobile Device Business
Libertyville, Illinois 60048

Questions and responses follow:

1. Please confirm if Bluetooth plots in the report are representative for this application. The plot identifiers do not match with the application's identifier.

Response: [Bluetooth plots are applicable and representative for this filing.](#)

2. Please update the Users Manual SAR values to indicate the GSM 1900 Body maximum of 0.32 W/kg. Combined SAR values with Bluetooth SAR are understood to not be used for final SAR values, but only for further SAR evaluation purposes.

Response: [Please refer to the revised user's manual submitted online.](#)

3. Please remove 900 MHz SAR Dipole Validation plots, data and certificate, as they are not relevant for this application.

Response: [Please refer to the revised SAR report attached.](#)

4. The SAR probe calibration points 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 SAR testing (see p.4/7 of the App Note). The tissue fluid used in these SAR tests (PCS bands for both the System Verification tests and the SAR tests) do not meet the criteria set forth in the App Note. Please submit a KDB with the dielectric parameter values, maximum SAR

values and this FCC ID to obtain permission to certify this application with this requirement waived, per TCB Conference Call April 14, 2009.

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.