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Supplement to SAR Test Report for Motorola portable cellular phone (FCC ID IHDT56LU3)

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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 IHDT56LU3). The requested information is addressed below in the same numbering sequence received.

1. Because the SAR probe is calibrated at a point more than 50 MHz away from the measured frequencies in the PCS and AWS bands, the FCC requires stricter tolerances on the tissue fluid parameters used for these measurements. The 1730 MHz brain tissue fluid conductivity levels measured on 6/11/10 and 6/12/10 do not meet these tighter requirements (i.e., they are not greater than the target level). Please provide scaled SAR data for the AWS head measurements to account for this.

2. The worst-case GSM850 SAR plots provided in the report were both measured on 6/11/10. Please provide System Accuracy Verification data for the cellular band measured on this day.

3. The BT SAR plot shows a power drift of 1.81 dB. This is in excess of 0.5 dB, the maximum drift permitted. Please re-measure this BT SAR configuration, ensuring that the power drift does not exceed 0.5 dB, and submit that data.

Response:

1. The 1730 MHz brain tissue fluid conductivity levels measured on 6/11/10 are greater than the target level, and no correction is required.

   The below SAR results were corrected for 1730 MHz brain tissue fluid conductivity that measured not greater than the nominal target on 6/12/10. Corrections were performed using the data provided in FCC KDB 450824. No correction was made for permittivity, since the measured tissue value already represents a conservative result in the measured SAR.

Highest Head SAR Configurations, Corrected SAR for Tissue Dielectric Parameters					
f **(MHz)**	**Description**	***10 g SAR value***		***1 g SAR value***	
		Extrapolated Measurement (W/kg)	**Corrected Measurement (W/kg)**	**Extrapolated Measurement (W/kg)**	**Corrected Measurement (W/kg)**
WCDMA 1700	Left Head 15° Tilt Position with Battery SNN5813B, Channel 1312	**0.68**	**0.68**	**1.22**	**1.22**

Table S1: Corrected SAR measurement results at the highest possible output power, measured in a head position against the ICNIRP and ANSI SAR Limit.

2. System Accuracy Verification data was measured for 835 MHz on 6/10/10 at 5:21 PM (see page 30 of 80). Worst-case SAR plots taken on 6/11/10 at 12:06 AM and 10:03 AM (pages 45 and 50 of 80, respectively) are within 24 hours of the 6/10/10 System Accuracy Verification measurement.

3. The SAR measurement was on a low power Bluetooth signal that is aperiodic by nature. The measured drift was a positive drift, which indicates that the power measured at the end of the SAR scan was higher than the power measured at the beginning of the scan. Since the final SAR value is determined from the measurements at the end of the scan, the higher drift results in a more conservative SAR result.