



Date: 30 July 2013

Federal Communications Commission
Office of Equipment Technology
Equipment Authorizations

Sent via E-Mail

Re: Additional Questions Regarding Response to Inquiry of FCC (Tracking Number 751822) for IHDT56PA1.

Dear Sir or Madam,

Motorola Mobility LLC, 8000 W. Sunrise Blvd.; Suite A; Plantation, FL, herein submits its response to your 24 April 2013 request for further information on FCC ID: IHDT56PA1.

Q 1. According to the latest FCC response to KDB Inquiry 751822, please clarify what constitutes "external components" in an exhibit in the filing describing representative accessories that are applicable for this filing. There should be an exhibit that explains the "front and rear housings and other associated components" that are being considered in this filing with respect to the discussions in the KDB inquiry 751822.

Response:

Features on the exterior housing of the wireless device that are subject to this configuration scheme include various housing colors (either by plastic formulation or coatings), button accents, bezels (i.e. frames surrounding buttons, display, etc.), etc. Variations of these that will be permitted are detailed in the updated Operational Description exhibit. However, none of the permissible variations will result in a new usage mode, add operational features, or change the shape or key physical dimensions of the wireless device. All of the permissible variations were devised with a view toward being consistent with FCC Class I Permissive Change guidelines, as documented in the rules (per 47 CFR 2.1043) and KDB guidance (Publication 178919 D01).

Q 2. Please address in the SAR report Sec 2.6, the following request from the FCC KDB inquiry 751822: "Rationale for using the specific test configuration to support compliance for the rest of the variants should also be included in the SAR report to support compliance." The information required to support the test methodology and results generally do not qualify for confidentiality. The device configurations and exposure conditions used for compliance testing and how the test results are applied to demonstrate compliance for the different combinations of device configurations and variants should be clearly identified and explained in the SAR report for the results to support the test reduction and exclusion requested.

Response:

Please refer Section 2.6 in the updated SAR test report, Revision E.

Q 3. Please address in the SAR report Sec 2.6 the following request from the FCC KDB inquiry 751822: "The device configurations and exposure conditions used for compliance testing and how the test results are applied to demonstrate compliance for the different combinations of device configurations and variant should be clearly identified and explained in the SAR report for the results to support the test reduction and exclusion requested."

Response:

Please refer Section 2.6 in the updated SAR test report, Revision E.

Q 4. Please provide the Attestation Letter to "identify the limitations and restrictions applied to the variants for ensuring compliance and how new variants that have not been identified in the specific filings are handled according to permissive change requirements." according to the FCC request in FCC KDB inquiry 751822.

Response:

The Statements of Certifications and Attestations exhibit has been amended to address this request.

Q 5. The Probe conversion factor in SAR plot problem needs to be fixed.

Response:

Motorola had used the "reporting" feature contained within DASY 5 for this application. This reporting feature creates output plots of the measurements taken from the DASY 5 system, but it does not modify the measured data in any way. Motorola recently noticed that there is a error in the default Reporting Template provided by SPEAG, in which the plots only show the 1810 MHz Head tissue conversion factor in the created reports, instead of the conversion factor used for the actual measurement performed. There is no compliance issue with these measurements, only a reporting defect, which has been corrected in the amended SAR test report (revision E).

The FCC is aware of this reporting defect based on the review of another application, and has asked us to identify all affected applications, and work with the TCBs involved to resolve the public record. We may be contacting you under separate cover should any of these activities require your involvement.

If you have any questions, please contact me at (954) 723-6272, or via e-mail.

Sincerely,

John Lewczak (signed)

Engineering Manager
Product Safety and Compliance
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