



MOTOROLA

Date: March 25, 2008

Subject: Request for additional information regarding FCC ID: IHDT56JH1

Reference:

Correspondence Reference Number: IHD80158
Confirmation Number: 803050158-60
Date of Original Email: March 19, 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, released during the recent TCBC Workshop. It is not clear whether, in this application, simultaneous SAR measurements (BT and GSM/GPRS) 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, identifying the BT and GSM antennas and showing their locations 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 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 report attached.

Per the March 20, 2008 discussion with the examining engineer, Motorola chooses to use the summation method for evaluation of simultaneous transmitters. Photographs, measured distances, and power output levels to determine the "antenna pair SAR to antenna separation ration" are therefore not required.

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. Please note that only the FCC may review a SAR report in which there is simultaneous transmission of 2 or more transmitters. 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 updated SAR test report for additional BT SAR data.](#)

3. Please submit an Operational Description (technical description) for the Bluetooth transmitter.

Response: [Please refer to page 7-8 of Exhibit 12 attached.](#)

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

Response: [Please refer to the revised Block Diagram attached showing clocks/oscillators.](#)

5. The user's manual contains none of the required FCC information. Please resubmit it, including all of the required information (e.g., 15.19, body-worn RF exposure compliance, etc.)

Response: [The required FCC information such as Safety and SAR data are included in the user manual supplement file as JG-EX08A. Please refer to the copy attached.](#)

6. Does the GPRS have a full-power multi-slot transmission mode available? The SAR test report does not reflect it. If it does, please be sure that this capability is reflected in the SAR test report, and tested, if so warranted.

Response: [This device does not have GPRS mode, therefore SAR test does not reflect it.](#)

7. Please note that the following test reports contain equipment listed as past their cal due date at the time of testing: Part 24 EMC, Bluetooth, Part 15B. Please address.

Response: [All equipment was in calibration during the time of testing. Any equipment that was going of cal during testing was replaced by similar equipment that has a valid cal date.](#)