

This is in response to :

Correspondence Reference Number: 11037

731 Confirmation Number: EA94679

Date of Original E-Mail: 12/15/1999

> 2. You may upload a scanned copy of your revised 731 form to cover
> letter exhibits or to clearly state the changes through a cover
> letter upload to correct output power. Note: output power indicated
> on the grant are ERP for Part 22 operations and EIRP for Part 24
> operations, as required or established in those rule sections. A
> phone with 400 mW conducted output listing for 600 mW ERP is not
> unreasonable, since it can all depend on the antenna gain and design
> or the particular phone. What is listed on the grant should be based
> on actual ERP or EIRP measurement data. If a device has an external
> detachable antenna, conducted output may be listed.
> Please revise the 731 form accordingly with respect to the actual
> radiated measurements. Note: ERP and/or EIRP are generally indicated
> as grant comments since a year or so ago.

I can find no way to copy my 731 or create a new one. Bette Taube has told me that I must Email her with any changes. Included in the correspondence with this attachment I have asked for the 731 to reflect 0.35 W ERP for AMPS, 0.6 W ERP for TDMA mode, and 0.8 W EIRP for the PCS modes.

> 4. Response #4 did not fully address the original question. Please
> review previous correspondence and address issues, including
> qualification for categorical exclusion, 20 cm or more installation
> and operating requirement, antenna gain issues etc. If this device
> allows operating configurations using external antennas, the
> operating and installation requirements for such operations must be
> addressed and specified to users and installers to satisfy MPE
> requirements. Leaving it up to the installers but without telling
> them how to comply with MPE requirements is not acceptable. At a
> minimum, the antenna gain and installation configurations that
> qualify this device for categorical exclusion (see 2.1091) and/or MPE
> compliance should be determined and given to users and installers to
> satisfy compliance. The purpose of such requirements should also be
> stated - for purpose of FCC RF exposure compliance.

The phone originally had a car kit that the choice of antenna was left upto the installer. When I further investigated this I found that the car kit had been cancelled and not removed from the manual. For future products that have car kits we will have an instalation manual and a recommeneded antenna.

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> 6. Based on responses for item #5 above, the statement in the manual
> (currently page 5) should be revised accordingly. The SAR report
> indicated a "Warning" will be placed in the manual, please revise the
> belt-clip and body-worn info to reflect a warning statement. The
> statement should also indicate it is for FCC RF exposure compliance
> and other non-tested body-worn accessories and configurations may not
➤ comply with SAR limits and should not be used.

The manual has been changed to read:

This phone is designed to be used at the ear. When used with a private handsfree headset, make sure the phone is placed in a Panasonic holster or carry case and attached to your belt or clothing. Using the phone with a Panasonic holster or carry case provides for optimal safety and performance levels. **WARNING!** In order to comply with FCC RF Exposure compliance, the phone must be at least 1.1 cm away from the body when in conversation. Your phone by itself and used with suggested Panasonic accessories comply with the FCC. Other accessories that are not suggested may not comply with Specific Absorption Rate (SAR) limits.

The rest of the questions are answered by the lab in a second attachment.
Pieter

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