

Palm Inc.

950 West Maude Avenue Sunnyvale, California 95085-2801

To: Mr. Tim Johnson, American TCB

18 Oct 2005

From: David Waitt

Subject: FCC ID: O8FMADECA

IC: 3905A-MADECA

This letter addresses your concerns regarding the FCC & IC application for the new Palm Treo product

If there are any questions or if additional information is required, please contact me at david.waitt@palm.com

On behalf of Palm Inc,

David Waitt

Date:

Sr. Regulatory Engineer David.waitt@palm.com

ATCB) The FCC asks that power measured is greater to or equal to that measured in EMC report. EMC reports show slightly higher power (24.3 dBm for some channels). HAC report appears to possibly use rounded numbers (24 dBm). Please review/explain.

Palm: The units tested for HAC compliance and EMC was chosen completely at random off of the manufacturing line and is physically a different unit from the one tested for EMC compliance over one year ago.

ATCB) Cover letter mentions a non-modified production unit was tested, but the test report references prototype. Please explain as a prototype would suggest changes were necessary to the unit. Additionally the FCC asks for any differences between a prototype and the final production unit to be explained

Palm: The fact that the HAC report refers to a prototype phone is an error. A production phone was chosen off the manufacturing line

ATCB) Please discuss how the Bluetooth portion of the device is addressed in this testing.

Palm: The Bluetooth profiles in the phone are intended to communicate with Bluetooth headsets, hands-free devices, car kits and so on. None of the intended Bluetooth usage models involve holding the phone to the ear. Thus there would be no HAC requirement for testing in these configurations.