

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

October 22, 2002

RE: FCC ID: OWDTR-0012-E_20021022

Attention: Kathy Grzovic

I have a few comments on this Application.

1. The 731 states that this is an application covering Parts 15, 90, 80, 74, and 22. Please note that the original grant appears to be for Part 90 only. It is not possible to issue a PC2 on Parts that are not on the original grant. This would be a complete new submittal or would only be for the Part 90 grant.

Response: The 731 Form was completed incorrectly. Please refer to the revised 731 form uploaded with this response.

2. The description of the PC2 states that 50% push to talk duty cycle, however, the SAR report shows the highest SAR values for 100% duty cycle. Consequently, the 100% numbers need to be on the grant as before. Since only the highest SAR values should be on the grant, the 50% duty cycle numbers should not be added to the grant. They may be added in addition however but this may prompt questions from the FCC.

Response: 100% duty cycle values were expected to be placed on the grant, however when evaluated with respect to the limit, the 50% duty cycle value must be used. The 50% value is on page 5 of the SAR report from CellTech. As the highest value recorded is 2.18 w/kg, the actual value is 1.09 as the FCC allows a 3dB break for push-to-talk radios. Thus this proves that the radio is within uncontrolled exposure limits and controlled exposure limits. The client wants no questions from the commission so please use the 100% value while designating it as such on the grant (as done on the original).

3. Changing the emissions designators might be considered changing the class of the device. It may be necessary to ask the FCC if this is possible for this grant. Otherwise, again, this may prompt questions from the FCC.

Response: The emission designator change was only being made to more accurately report the emission characteristics (slightly different numbers were used in the Carson's calculation from the original report). There is no need to change the emission designator if this may cause confusion at the FCC. Please feel free to use the original designators as nothing in the radio has changed to affect them. If so desired, we can submit a revised cover letter without the emission designators.

Dennis Ward

<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the sender.