April 19, 2002

CKC Certification Services
5473-A Clouds Rest
Mariposa, CA 95338
Attn: Dustin Oaks

SUBJECT: **VTECH MOBILE (ASIA) LIMITED**
FCC ID: P5680-5196-00
Request for Additional Information

Dear Dustin,

On behalf of VTECH Mobile (Asia) Limited is our response to your request for additional information for the subject application dated April 12, 2002 as follows:

SAR

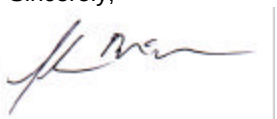
1. Please see attached new EMC test report. The conducted spurious emissions, occupied bandwidth, band edge, receiver spurious emissions, and frequency stability have been retested by Celltech Research Inc. at the appropriate frequencies and power levels corresponding to the previously tested EIRP, radiated spurious emissions, and SAR measurement data. The previously tested EIRP and radiated spurious emissions measurement data is included in the new EMC test report.
2. The extrapolated conversion factors from 1800MHz to 1900MHz were performed as per the manufacturer's instructions. The particular E-field probe used during the evaluation was calibrated at 1800MHz only. Based on new calibrations procedures from the manufacturer, 1800MHz and 1900MHz conversion factors are identical due to an increased uncertainty budget for the E-field probe calibration. A re-evaluation of the highest reported SAR found during the evaluation with the extrapolated 1900MHz probe conversion factors yielded a 2% increase in the final exposure value, which is significantly less than the overall uncertainty of the measurement system.
3. Please see attached revised user's manual with revised RF safety statement (page 40) and reference to specific accessories tested for this device (page 43).
4. For both EMC and SAR evaluations the EUT was controlled using a Rohde & Schwarz CMD55 base station simulator.

EMC

1. Please see attached new EMC test report with test data for the full tuning range of the device (1850.2-1909.8MHz). Also attached is the revised FCC TCB Form 731 stating the full tuning range of the device.
2. To account for the burst nature of the EUT's transmitter for the conducted emissions, the spectrum analyzer used in the evaluation was set to peak hold and the highest emission was extracted. For the radiated spurious emissions, the maximum emission was found by rotating the device 360 degrees on a turntable and varying the height of the receive antenna from 1 to 4 meters. Once a peak was found the spectrum analyzer was set to peak hold and the value of the emission was extracted. See page 2 of the new EMC test report for details of the setup used.
3. All spurious emissions made from the lowest radio frequency generated in the equipment to the tenth harmonic of the carrier were investigated for radiated spurious emissions. All emissions were either at or below the levels of the harmonics reported.
4. The device was retested for frequency stability down to the battery endpoint. See page 9 of the new EMC test report.

If you have any further questions or comments concerning the above, please contact the undersigned.

Sincerely,



Shawn McMillen
General Manager
Celltech Research Inc.
Testing & Engineering Lab

cc: VTECH Mobile (Asia) Limited
7 Layers, Inc.