Chris Harvey

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Sent: Saturday, January 03, 2004 11:06 AM

To: Kyung-Taek LEE (leekt@digitalemc.com)

Cc: Charlie Park (charlie@digitalemc.com); 'charvey@ieee.org'

Subject: Modottel FCCID : POQWTE-500 MT#14882 questions

KT, I have reviewed the application for Certification of the Modottel phone FCC ID: POQWTE-500 and found that the following items need to be corrected:

1) The Users Manual is missing the required statements from 15.21 (unauthorized modifications…) and 15.105 (AMPS receiver and Digital device interference…). The previous Modottel filings had the following wording which is acceptable:

> Use only the supplied or an approved replacement antenna. Unauthorized antennas, modifications, or attachments could damage the phone and may violate FCC regulations.
>
> **Acknowledging Special Precautions and the FCC Industry Canada Notice Cautions**
>
> Modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.
>
> **FCC compliance Information**
>
> This device complies with part 15 of FCC Rules.
> Operation is subject to the following two conditions:
> 1. This device may not cause harmful interference, and
> 2. This device must accept any interference received.
> Including interference that may cause undesired operation.
>
> **Information to User**
>
> This equipment has been tested and found to comply with the limits for a Class B digital device, Pursuant to part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation.
> This equipment generates, uses and can radiate radio Frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications.
> However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:
> ? Reorient or relocate the receiving antenna.
> ? Increase the separation between the equipment and receiver
> ? Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
> Consult the dealer or an experienced radio/TV technician for help.

2) The RF Exposure statements in the manual do not provide any information to the user about the use of body-worn accessories. The SAR testing was performed with a separation distance of 1.5cm without any holster or clip. The user must be notified that they need to use body-worn accessories with no metallic components that provide at least 1.5cm separation to the body. The previous Modottel filing had the following statement which is acceptable:

> Body-worn Operation
> This device has been tested for body-worn operation and meets FCC RF exposure guidelines when used with an accessory that contains no metal components, and positions the handset at a minimum of 1.5m from

the body. Use of other body-worn accessories may not ensure compliance with FCC RF exposure guidelines and should be avoided.

3) The Tissue Verification from page 15 of 35 of the SAR Test Report indicates that the Verification was performed on 7/22/2003. The SAR tests were performed on 12/11/2003 to 12/15/2003. Please provide Tissue Verification measurements for each day of SAR testing. Also, please provide the liquid and ambient temperatures at the time of Tissue Verification.

4) Please note that SAR measurements of the 2nd Hot-Spot are required. The SAR Test Plot for AMPS Mode CH991 Left-Head Touch Slide-Down position shows a significant 2nd hot-spot. However since the SAR measurements of the 1st SAR spot was measured at 0.794W/kg (the lowest SAR measurement for this position), it is expected that the 2nd SAR would be below this level. In the future, please ensure that you measure SAR for any significant 2nd Hot-Spots. It is acknowledged that measurements of 2nd Hot-Spots was performed in the PCS mode for many positions.

5) Only one Dipole Validation plot is provided for 835MHz when SAR measurements were performed on 12/11/2003 and 12/12/2003. Please provide Dipole Validation data for each day of measurement. Please provide a date on the Validation Plots showing when the measurements were performed.

The above items must be provided prior to completion of the review of this application.

Best regards,

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