



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

December 19, 2002

RE: FCC ID: QFXNHL-8

Attention: Andrew White

I have a few comments on this Application.

- 1 The internal photos on pages 8, 9, 16, 18, 19 and 20 of the internal photos document Confidential_Exhibit 09 Internal Photo update.pdf are not clear. Please provide clear pictures of the circuitry under the shielding and the other photos indicated on the pages mentioned above.
- 2 Please note that 15.21 Information to the user, requires that the non-modification statement clearly inform the user that unauthorized modifications may void the users right to use the equipment. Please note that the statement on page 178 merely states that it may violate FCC regulations. This is not the intent of the statement. The intent as mentioned above is to inform the user that unauthorized modifications may void the user right to use the equipment. Please make this condition clear in the manual.
- 3 Please note that the accessories used to test SAR are not listed in the manual. Please list the approved accessories used during SAR testing (Battery, Type: BL-5C, DUT#232026 & #232027, Headset Type: HDE-2 DUT#232025) in the manual.
- 4 Please note that the technical information listed on page 188 of the manual does not provided the numbers referred to. Please provide a manual with the values indicated (i.e. putput power etc).
- 5 Please note the this is a part 15 device and as such must have the 2-condition statement required by 15.19 labeling requirements. This statement is to be on a label on the device unless size or justifiable reasons prevent the label from being placed on the device. If the label cannot be placed on the device due to size, etc. then the verbatim 2-condition statement MUST be placed in the instruction manual, pamphlet or on the box. Please provide the sample label to be placed on the device or alternately, please revise the manual to include the 2-condition statement or show proof that it will be on the box.
- 6 Please note that on pages 22 and 24 of the report you state that the maximum EIRP measured on channel 512 was 31.88dBm. On page 6 of the report you state that the maximum EIRP is 30.11dBm. Please note that reports are to report the MAXIMUM POWER levels during testing. These numbers do not agree. Please correct the report to give the maximum power levels measured.
- 7 The report indicates a higher power than measured in the SAR report (i.e. 31.88dBm in the EMC and 30.11dBm in the SAR). Please note that while for EIRP there may be justification for greater than 5% differences in power, under no circumstance is the SAR maximum power to be lower than that reported and measured in the EMC report. Please explain and if necessary retest the device so SAR levels are higher than those in the EMC report.
- 8 Please note that the SAR report states that EIRP measurements were not performed at the time SAR testing was done but at RFI in England. Please note it is not possible to determine if the device was actually outputting the maximum power at the time of test unless it was verified at the time of test. Please also note that IEEE1528 states that the power is to be adjusted to the maximum power the user will be subject to and that the power should be verified and steps should be taken to check on any variations of power DURING SAR testing. Please explain why EIRP measurements were not done at the time of SAR testing. Please provide evidence that the EIRP levels indicated in the report were indeed those verified during SAR testing.
- 9 Please note that the EMC report does not indicate that GPRS mode was tested. Please verify.

Dennis Ward

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.