



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

February 15, 2005

RE: FCC ID: SHFWDP318_ATCB002154
Attention: Jay Sarka

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. The document provided in the application as the tune up exhibit states, "The reference frequency and Output Power for the FCCID: SHFWDP318 GSM/GPRS phone are calibrated at the factory. There are no field-adjustable components in this product." Please note that the tune up procedure required by the FCC is not a user tune up procedure but is the factory tune up procedure itself which shows how the calibration of the phone is performed. Please provide the factory tune up procedure.
2. Please provide the Part 22 and Part 24 test reports for this application.
3. Please provide the SAR report for this application. Please make sure that the ERP/EIRP and/or the conducted powers used in the SAR report and the EMC report are within the variance allowed by the FCC (i.e. +/-0.5dBm conducted and +/-3dB ERP/EIRP).
4. Please also make sure that, as stated in the manual, the provided accessories are tested for SAR. If body SAR is tested without a provided belt clip or holster, please ensure that the manual contains a proper body SAR separation distance for accessories containing no metal. Please provide the expected SAR information in the manual that follows the examples given in OET 65C under the section "RECOMMENDED TEST POSITIONS FOR BODY-WORN AND OTHER CONFIGURATIONS".
5. Please note that the FCC expects to see the highest head and body SAR values in the manual and expects to see a similar warning statement as found in OET 65C. Please provide a manual that lists the highest head and Body SAR values.
6. Please note that the manual states the user is to use only approved accessories, but does not list these accessories. Please explain and please provide a manual that gives the user information on which accessories are approved.
7. Please note that the frequency tolerance listed on the 731 is confusing. Is the tolerance 2 ppm or is it actually 2.2×10^{-5} ppm. This later would appear to be .000022ppm. Please clarify.
8. Further evaluation and comments may result once the missing items have been provided.

Dennis Ward
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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.