



11<sup>th</sup> May 2007

Mr. Stanley Lyles  
Equipment Authorization Branch  
Federal Communications Commission Laboratory  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: Form 731 Confirmation Number: EA261741 with FCC ID: ABZ99FT3082 and Correspondence Number: 33018.

Dear Mr. Lyles;

Motorola Inc., 8000 West Sunrise Boulevard, Fort Lauderdale, Florida 33322, herein submits its response to the 8<sup>th</sup> May 2007 request for information in Correspondence Number 33018.

**Q1)** Photos show RF exposure notice label only on microphone cord - unclear whether and how microphone assembly with label will always be used with radio (eg use with unlabeled microphones precluded), or whether other or additional label schemes may be appropriate - if not in filing already, please explain and/or revise

**A1)** All microphones available for this product have the label attached. No other acceptable location or scheme of marking for this label is available for this product.

**Q2)** For part 90 devices, output power listed on a grant should represent the manufacturer's rated output power, i.e. 45 W for this application.

RF exposure evaluations for Part 90 devices (when applicable) must be done using the actual maximum output power achievable for production units, up to 20-percent above rated power, or if maximum output is not used then filing must demonstrate that the device will not operate at levels up to 20-percent above rated power.

When RF exposure is done at higher than manufacturer's rated output power, the grant line-item shall list the rated output power, but maximum power as allowed by 90.205(r) variation, which may also be what is reported in the filing as measured, may be listed in the grant remarks field.

For this application, FCC will revise Form 731 line-entries in accordance with above.

**A2)** We concur and accept the revised Form 731.

**Q3)** If not in filing already, please explain effects on measured MPE data and steps

taken to ensure results for 2:1 TDMA signal are correct, probe calibration is valid, etc.

**A3)** MPE reported data was measured with DUT in its maximum 100% (CW) duty cycle with an approximate output power of 54W.

TDMA 2:1, as explained in the report, defines the signal as transmitting one slot (30ms) within a two slot (60ms) frame or 50% of the time. The average power over the frame is equivalent to 27W not 54W and therefore data for TDMA 2:1 is not present.

**Q4)** If not in filing already, please explain effects on calculated field and SAR data and steps taken to ensure results for 2:1 TDMA signal are correct, FDTD input signal represents actual exposure, etc.

**A4)** SAR simulations were conducted with a CW (100% duty cycle) signal.

TDMA 2:1, as explained in the report, defines the signal as transmitting on one slot (30ms) within a two slot (60ms) frame or 50% of the time. The average power over the frame is equivalent to half of a CW signal and therefore data for TDMA 2:1 is not present.

**Q5)** The filing must have a justification letter for extended frequencies outside of applied rule part. Operation must be justified under 2.807. For example, Government / Military use or exportation to other countries has been allowed.

**A5)** This product will be marketed to various elements of the US Government and will also be exported to Canada whose certification will be under IC:109-99FT3082.

**Q6)** Justification letter from grantee must indicate marketing plans to ensure USA users, other than those specifically identified, cannot operate device outside bands allowed under the relevant rule parts applied for.

**A6)** The software used by the Dealer personnel will recognize the frequency limits of the Grant and limit frequency selections to these limits. The Dealer personnel are responsible to only select frequencies that are granted to the station.

- This radio complies with Section 90.203 of the Rules in that the operator cannot directly program transmit frequencies using the unit's normally accessible external controls
- Also, these radios are marketed through Authorized Dealers who programs frequencies authorized by the FCC on to the radios per the listing on the customer's FCC License.

Please contact me if you require any additional information.

Sincerely,

/s/ *Larry D. Larsen (signed)*

Eng. Section Manager

Email: [Larry.D.Larsen@Motorola.com](mailto:Larry.D.Larsen@Motorola.com)