

Date: 1st May 2002

Mr. Martin Perrine
Authorization & Evaluation Division
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Form 731 Confirmation Number EA543727 with FCC ID: ABZ99FT5000

Dear Mr. Perrine;

Motorola Inc. herein submits its response to the 29th April 2002 phone call request for additional information regarding our System Performance Check process.

The System Performance Check process adopted by the Motorola CGISS EME Lab is consistent with IEEE Std. 1528 (April 4, 2002) paragraph 8.2, FCC Supplement-C (ed. 01-01), and CENELEC SAR Standard EN-50361. Also, System Validation process is consistent with IEEE-1528 (April 4, 2002) paragraph 8.3.

System Performance Check target values are determined/measured after system validation using the system check setup.

The system validation is performed per IEEE Std. 1528 using reference dipoles listed in Table G.1, head tissue with dielectric properties listed in Table 5.1, and numerical reference SAR values for reference dipoles listed in Table 8.1.
(Note: SPEAG dipoles are constructed per IEEE Std. 1528)

The resulting measured SAR for both 1g and 10g averages become the new system performance check target values for that specific test frequency and dipole source.

Using the same test system and test setup, other dipoles, at this same frequency, that require system performance check targets are measured.

For frequencies ≥ 750 MHz, all appropriate dipoles versus all tissue types (head, body), including CENELEC variations that require system performance check SAR targets generated are measured.

System performance check target values for 300 MHz and 450 MHz dipoles are generated after performing the system validation using the 835 MHz reference dipole (SPEAG) as stated in IEEE Std. 1528; all appropriate 300 MHz and 450 MHz dipoles versus all tissue types (head, body), including CENELEC variations that require performance check SAR targets generated are then measured.

This process is repeated for all required system performance check frequencies.

System performance check is performed daily prior to compliance test and the results must be within $\pm 10\%$ of the previously determined system check target value.

It is performed at a central frequency of the transmitting band or, when a radiating source is not available at the operating frequency range of the test device, a source operating within 100 MHz of the mid-band channel is used. For frequencies below 300 MHz, system performance check is performed at 300 MHz.