

Date: April 21, 2009

Subject: Request for additional information regarding FCC ID: IHDT56KJ1

Reference:

Correspondence Reference Number: IHD90199
Confirmation Number: 903030199-01
Date of Original Email: April 15, 2009

Prepared by:

Andrew Bachler, Principal Staff Engineer Motorola Mobile Device Business Libertyville, Illinois 60048

Questions and responses follow:

1. The Cover Letter lists GSM 850 capability. This is not supported by the remainder of the application. Please revise accordingly.

Response: Please refer to the revised cover letter attached.

2. Please submit external photos showing all sides of the EUT.

Response: Please refer to the revised external photos submitted online.

3. It appears that several pcb photos of boards other than the main board show RF shields in place. If this is the case, please submit photos of these boards with the shields removed.

Response: Please refer to the revised internal photos submitted online.

4. Please specify the gain of the BT antenna.

Response: The peak BT antenna gain is -0.5dBi.

5. The SAR probe calibration point is more than 50 MHz removed from the measured band. In accordance with the FCC <u>Application Note 450824 D01 SAR Prob Cal and Ver Meas v01r01</u>, this situation entails additional requirements for the tissue fluid parameters used during testing (see p.4/7 of the App Note). The tissue fluids used in the system verification tests do not meet the criteria set forth in the App Note. <u>In accordance with FCC instructions given during the 4/14/09</u>

TCB Conference Call, a KDB question must be sent to the FCC, along with the pertinent information and data, so that they may determine if additional testing is required. Please do so, and then, after following any instructions given to you by the FCC, submit their written (email) response to us, so that we may complete our review. It is suggested that, in the future, this procedure take place prior to submittal of the application to the TCB.

Response: The SAR measurements performed for the system verification were 10 MHz away from the probe's calibration frequency of 1810 MHz. This frequency separation is within the +/- 50 MHz specified in the SAR Probe Calibration section of the FCC Application Note 450824. Therefore, Motorola believes that no additional analysis is required for the SAR impact of the tissue dielectric parameters separation from the nominal targets. The routine SAR measurements for testing of the head and body worn configurations were performed at 1880 MHz. These tests occurred within +/- 100 MHz from the probe's calibration frequency. The tissue dielectric parameters used for these tests (given in section 4 of the original filling's Exhibit 11) do meet the criteria set forth in the additional step #2 on p.4/7 of the FCC Application Note.