

1) Please provide a Cover letter explaining the changes made and the justification for a Permissive Change Application. Please include a justification as to what tests needed to be performed (i.e. please explain why the EMC portion has not been retested, etc.).

[See Attached Document.](#)

2) For permissive change applications, the conducted power is expected to be within 0.5 dB of the original conducted power. It appears that the conducted power in this application exceeds this amount.

Original EMC/SAR – 25.5 dBm AMPS, 27.5 dBm TDMA 800, 27.1 dBm TDM 1900

Current SAR – 25.1 dBm AMPS, 28.4 dBm TDMA 800, 27.8 dBm TDM 1900

Note that since this is a delta of 0.9 dB, this is not considered acceptable as a permissive change application. Additionally, the FCC desires the conducted power setting for SAR testing to be greater than what was listed in the EMC report but it should also agree with the tune up procedure. Please note that while the TDMA measurements were higher than the original EMC values, the AMPS was lower. Additionally, the TDMA appears to be > 1 dB above what was given in the tune up procedure. Please recheck the power measurements, software settings, etc. to ensure proper output levels were reported. If the output power is not within 0.5 dB of the original, this application will likely require submittal under a new FCC ID.

[We have found out these samples were unintentionally tuned to much higher TDMA power levels than the mass production targets, which are consistent with original filing. This TDMA engine is capable of operating using power output this high without being in saturation. In appendix B maximum power drift has been 0.2dB. Because TDMA power levels have been higher, TDMA SAR has been overestimated.](#)

3) It appears that the verification test date (6/2/03) for Muscle at 835 MHz given in section 4.1 does not match the information given on the verification plots in Appendix A (6/5/03). Please correct the report as appropriate.

[This is a typo in the test report. The correct date is indeed 06/05/2003. We have amended that page.](#)

4) The test dates for measurements of the muscle tissue parameters given in section 4.2.2 (6/2/03) do not appear to match the verification and test dates of 6/5/03. Please correct the report as appropriate.

[Those dates should be 06/05/2003 as can be seen in Appendix A. This page is amended as well.](#)

5) the HWID Number given for the body worn configuration in section 7.3 of the report does not appear to match that in the plots. Please correct.

[Title in 7.3 is wrong, HWID of used phone in body worn battery check is 5001. This page is amended.](#)

6) For purposes of reviewing the users manual information regarding SAR, please explain if this device is considered a model 1260 or 1261 (users manual page 63).

[The 1260 and 1261 share the same FCC ID, therefore this update is applicable to both models.](#)

7) Review of the users manual lists multiple accessories (LPS-3 Inductive Loopset, HAD-9 TTY Adapter, HDC-5 Headset, HDE-2 Headset, HDB-5 Headset). However it appears that only the HDE-2 Headset was tested. Since not all combinations have been tested, please provide a justification as to the determination of the worse case configuration(s).

[All these accessories connect to the phone using the same plug connector and are wired similarly. Therefore no variation in SAR is expected.](#)

8) The original SAR report contained in the original application for this device shows a CSM-6 body worn accessory that does not appear to be tested in this application. Please explain.

[This accessory is no longer offered for this product. Please see the updated UG for this information.](#)

9) Please provide a justification as to why SAR plots were not provide for each set of data listed in sections 7.1, 7.2, and 7.3 of the report.

SAR distributions are substantially similar or equivalent to the plots submitted, and to keep file size small these have been left out.

10) Please provide information regarding the procedures to establish the test signals (e.g., base-station simulator vs internal test codes)?

Test signal was established by using special test codes.