



**Palm Inc.**  
950 West Maude Avenue  
Sunnyvale, California 95085-2801

To: Mr. Tim Johnson, American TCB  
From: David Waitt  
Subject: FCC ID: O8FAOKI  
IC: 3905A-AOKI

Date: 27 August 2005

This letter addresses your compliance concerns regarding the FCC & IC application for the Palm T|X.

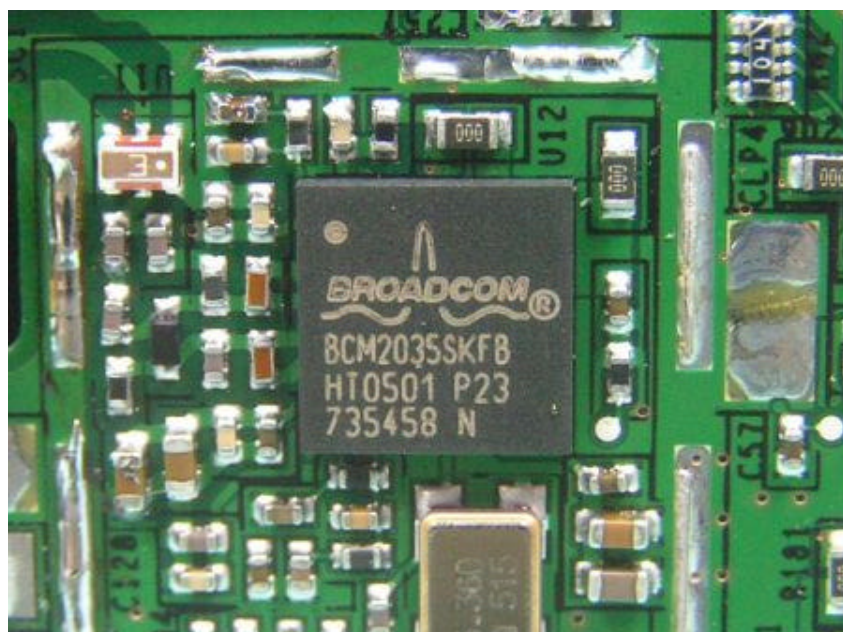
If there are any questions or if additional information is required, please contact me at [david.waitt@palm.com](mailto:david.waitt@palm.com)

On behalf of Palm Inc,

David Waitt  
Sr. Regulatory Engineer  
[David.waitt@palm.com](mailto:David.waitt@palm.com)

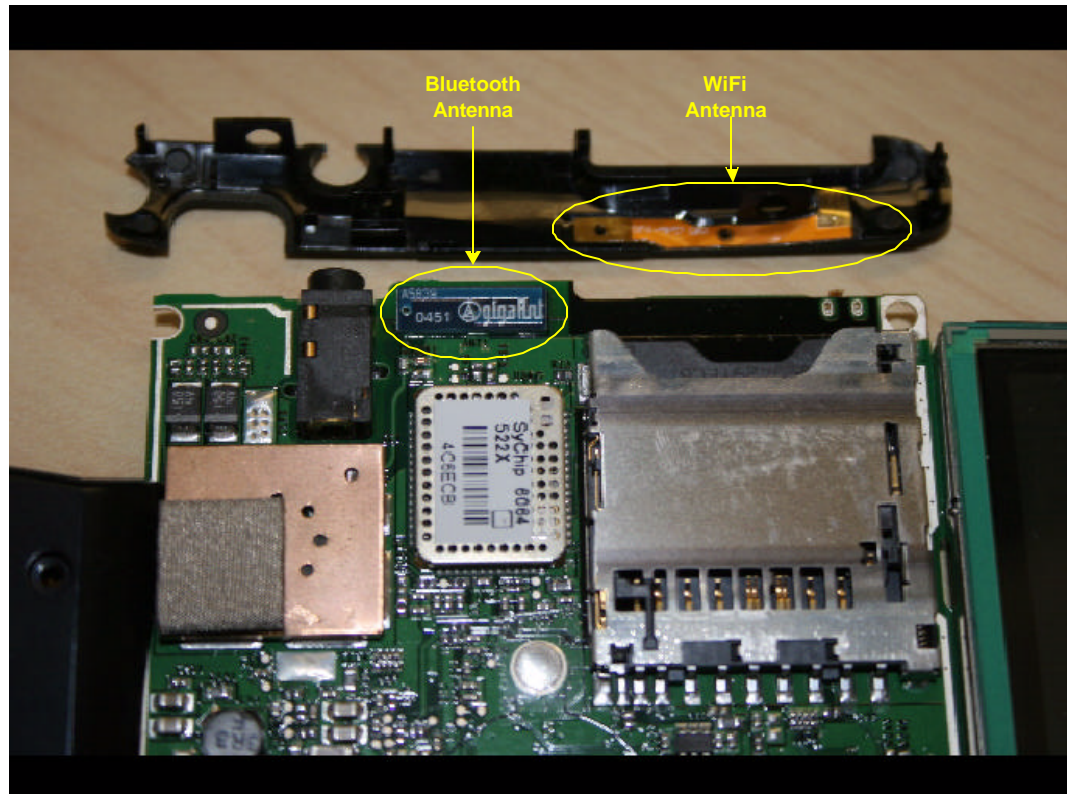
Palm: A 731 form has been uploaded to the ATCB site.

Palm: See photos below.



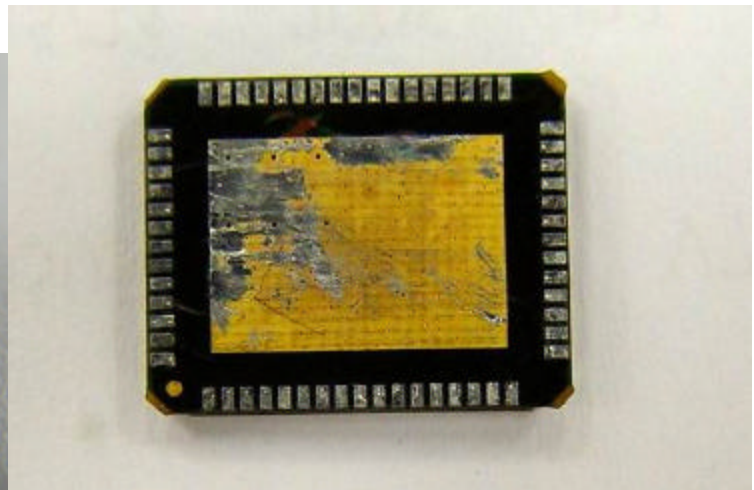
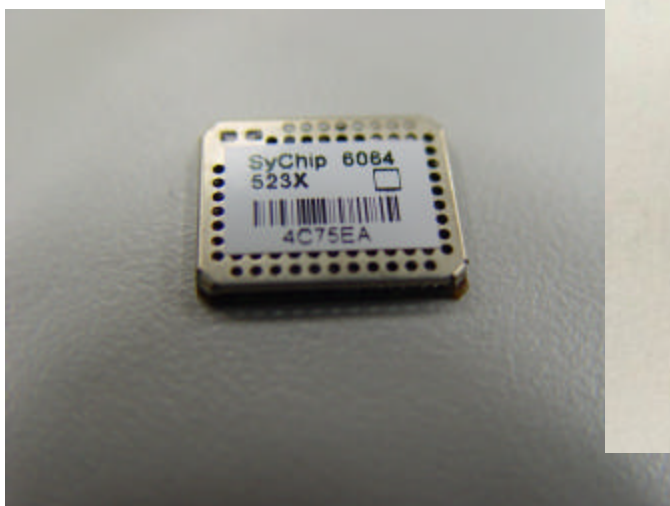
3) Photographs do not clearly show (or at least identify) both antennas, please label or show photographs as necessary to denote both antennas within this device.

Palm: See photo below.



4) Even though the RF portions are a secondary module boards, bottom views of the module boards are still required. It is not necessary to destroy the sample to take these, but instead take from an uninstalled part. Please provide.

Palm: See Photos



5) Please provide a separate test configuration photograph exhibit.

Palm: A separate exhibit showing the test setup photos has been uploaded to the ATCB site.

6) This device supports a direct sync cable and should be considered a PC peripheral. However labeling does not include FCC logo for DoC Authorization.

Palm: Palm was unable to fit the FCC logo on the device. The FCC logo is contained within the user guide in the regulatory section of the guide. Additionally the FCC ID certification number is on the regulatory label on the outside of the device.

7) Users manual for DoC should move the 2 part information from page 151 to 152 according to 2.1077.

Palm: It is not possible to fit the requested information on one page of the user manual (without making the text illegible) Additionally, it is unclear where 2.1077 requires the information must reside on a single page. Please provide guidance.

8) Test Report lists BT antenna as -10 dBi, while the information provided supports -0.5 dBi. Which is correct. Please

correct as necessary.

Palm: The .5 dBi gain specified in the data sheet is an ideal case, with the antenna centered in the middle of a relatively ground plane. Unfortunately the actual implementation of the antenna, not having a large ground plane and being in close proximity to other components and so has a negative effect on the performance of the antenna, such that the gain of the actual implementation is approx -10dBi instead of the ideal .5dBi.

9) Test report supports 14.92 dBm for WLAN power, while theory of operation supports up to 17 dBm. Note the FCC expects device to be tested at maximum output power. Please review/correct as necessary.

Palm: The typical output power for this device is specified at 14.72 dBm. While the maximum power is specified in the data sheet possible being as high as 17 dBm. The unit that was tested operated closer to the typical output power. This being a sealed solid state device there is no adjustment for transmit power. Additionally, it is impractical, and perhaps not even possible, to sort through units to obtain a unit that happens to transmit at the maximum rated power.

10) Please note that the new 15.247 methods require a PEAK detector when using a power meter. Please confirm what type of detector was used with the power meter.

Palm: The test equipment list, in section 6 of the report, item 21 indicates a Rhode and Schwartz NRV-22 power sensor. This is a peak power sensor.

11) The device is a portable device. According to ANSI C63.4 this is required to be investigated in each of 3 axis in effort to obtain worse case results. Please confirm or retest as necessary.

Palm: Please See test report, Rev B, uploaded to the ATCB site.

12) Section 5.1 of the test report incorrectly appears to report the RBW settings used. Please review.

Palm: Please See test report, Rev B, uploaded to the ATCB site.

13) For SAR the device was tested with specific body spacing, but the users manual does not properly inform the user on the specific requirements regarding accessories and/or spacings that must be met for RF exposure compliance. Please update the users manual as necessary.

Palm: The correct version of the regulatory section of the manual has been uploaded to the ATCB site.

14) IC portion of the label should follow RSP-100 requirements of "IC:" not "IC ID:". Please correct.

Palm: The label has been corrected. A drawing of the corrected version has been uploaded to the ATCB site.

15) IC number on the label should follow requirements of IC regarding use of a dash between the CN and UPN number. Please correct.

Palm: The label has been corrected. A drawing of the corrected version has been uploaded to the ATCB site.

16) SAR testing requires the worse case position to be tested with Bluetooth turned on and off. This data was not provided.

Palm: The device is not capable of transmitting Bluetooth and WiFi at the same instant in time. These for the ON/OFF test was not required. Additionally, the RF transmit power of the BT transmitter is below the power threshold for evaluating SAR.

17) It is preferred that for IC an RSS-102 Attestation be provided. If possible, please provide.

Palm: An attestation has been uploaded to the ATCB site