



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

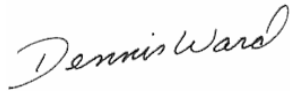
September 6, 2005

RE: FCC ID: BEJP7200_ATCB002748
Attention: Jay Kim

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please provide the tune up procedure for this application.
2. Please note that the schematics and manual indicate that a Bluetooth transmitter exists in the device. Please note that if a BT device does exist in the device, you must also certify that portion under 15.247. If the BT device is not part of the transmitter, please explain why the schematics show the BT device and please provide a schematic that represents the actual device (i.e. if there is no BT please explain how this circuitry is disabled and made non functional). If the BT is part of the device please note that this will also have to be certified. In this case you will need to provide the necessary documentation to support the BT application.
3. If this device does contain a BT transmitter, please provide a 731 that adequately addresses this issue.
4. Please note that the FCC wants the separation distance for Body SAR listed in the manual along with the highest Body SAR level and the fact that body worn accessories must not contain metal. Please report minimum separation distance, the requirement for non-metallic body accessoriness and the highest recorded Body SAR in the manual.
5. Please note that if this device does contain a Part 15 BT transmitter the mandatory statement of 15.19 (two condition statement) must appear on the device or in the manual. As this is a cell phone, the device can be considered too small and as such the statement may be placed in the manual.
6. Please note that the exhibit labeled as an operational description does not appear to give an actual description of how the device operates. Please provide a description of how the device operates. Please include an operational description of the BT transmitter if this is part of the device.
7. Please note that most of the test data tables etc state CDMA. Please note that as this is a GSM phone this should be GSM. Please explain and please correct to reflect the type device tested.
8. Please note that the power drift shown in the table on page 20 of the SAR report far exceeds the allowed 5%. In some instances it appears that the drift exceeds 40%. Please also note that the power drifts listed in the data plots do not match the power drift listed in the table mentioned above. Please explain and if necessary, please retest the device keeping the power drift within the allowed 5% drift.
9. Please note that page 5 of the SAR report says the Duty Cycle (crest factor) for the device is 1. However, please note that GSM has a crest factor of 8 or 8.3. Please also note that the plotted data shows a crest factor / duty cycle of 8.3. Please correct the report to correctly show the appropriate crest factor for the device tested.
10. Please note that page 40 of the SAR report indicates that the flat phantom may have been damaged and subsequently repaired. However, the repair does not appear to meet the requirements/specifications of 1528 and OET65C (i.e the thickness of the phantom may not in specs in the area of repair and the area of repair appears to be in the radiation path between the antenna and the fluid). As the repaired section is an uneven and rough appearing surface, it is not possible to tell if the device antenna presents a uniform field to the phantom surface and fluid in this area. Please provide test data that is taken using a flat phantom that is in FULL compliance with the design and technical specs for a flat phantom. Alternately, please provide evidence as to exactly how this repair makes the flat phantom continue to meet the specifications for a flat phantom. I.e. what is the material used in the repair, how does this material affect SAR measurement (for example; what makes this a useable and reliable phantom for accurate

measurement results. Has any analysis or calibration data from the manufacturer of the phantom been done showing acceptance of this modification to the flat phantom?).

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward

<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.