From: M. Flom Associates, Inc. [general@mflom.com]

Sent: Wednesday, August 13, 2003 6:48 PM

To: tei@timcoengr.com

Subject: Vertu Ltd. FCC ID: P7QNPM-7 Job #1079UC3

In regards to the request made on August 6, 2003 (with attachments):

1) The Applicant has advised that the Theory Of Operation does not need to be held Confidential.

- 2) We agree that the ESN Statement does not need to be included in the submission.
- 3) Attached please find amended page 8 showing EIRP. Please note that figures were EIRP, but our page 8 had a typo error.
- 4) Attached please find new Band edge Plots.
- 5) The test results were EIRP and are in agreement with the SAR numbers and less than the Original Grant. (See item 3 above).
- 6) The Applicant states the following: "The applicable results here are for DUT: P7QNPM-7; Type NPM-7: Serial 004400/06/178570/3 Left Cheek position appendix B. Firstly a wide area plot was performed, followed by a more accurate detailed cube search, showing two hot spots.

The Worst case SAR (1g) value for this particular plot is shown to be 0.369 mW/g. To clarify as requested, this worst case value, is for the larger of the 2 hot spots and is the larger circumference area shown upper most on the scan picture (nearest to the top), in relation to the head, closest to the ear.

A smaller and separate hot spot is also shown, lower on the scan plot (nearest to the bottom), in relation to the head, closest to the Jaw. This yielded a lower SAR value of only 0.196mW/g and was therefore not detailed in the report, not being worst case.

This performance pattern is maintained throughout the report."

Trust the above meets the requirements and the Grant will be issued.

Regards,

M. Flom Associates, Inc.