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

February 27, 2003

RE: FCC ID: GMLRH-39
Attention: Nerina Walton / Alan Ewing
I have a few comments on this Application.

1. Please note that the exhibit that is supposed to be the block diagram is only a chip location drawing of the phone. Page 3 of the theory of operation exhibit is more of what the block diagram is to be. Please extract this block diagram and replace the current block diagram exhibit with page 3 of the theory of operation. xxx
2. Page 4 of the schematics exhibit is not readable. Please provide a new page 4 of the schematics. xxx
3. Please note that SAR testing was carried out using the HDE-2 headset. What has been done to evaluate the HDC-10 retractable remote control Headset? This headset appears to be more complex and possibly more problematic to SAR situations. If this is a body worn device, why was this not tested? xxx
4. What has been done to evaluate the Loopset LPS-3? xxx
5. Please note that the power levels used in SAR and EMC testing are to be within 5%. When there is a difference in power levels the SAR testing is to be the higher. In the TDMA 800 mode not only is the EMC conducted power level higher, it is significantly greater than 5% (EMC reports 29.3dBm or 851mW, SAR reports only 27.3dBm or 537mW). Please also note that if the power listed in the SAR report is the ERP/EIRP then there is still a significant deviation between the EMC and SAR reports and the SAR report is still not the highest level (ERP of 28.4eBm or 691mW in EMC and 27.3dBm or 537mW in the SAR). The same situation occurs in the part 24 frequencies also. Please retest SAR using maximum power levels at the various modes. Please also make sure that these levels are within 5% of that recorded in the EMC report and if a difference exists, please make sure the SAR reports the higher of the levels. xxx
6. Please examine your EMC report and correct it to be inline with the Part 22 changes as of February 18, 2003. Significant changes have taken place which affect out of band measurements etc. xxx
7. Please note that 22.915 no longer exists. Please correct your report to come inline with the new rules of Feb 18, 2003. xxx
8. Please review your test plot on page 20 of the report. It appears to be outside the mask. Please correct or explain as appropriate (i.e. remeasure in line with the new rules as of Feb 18, 2003). xxx
9. Please remeasure your out of band data on pages 26 – 29 of your report to come in line with the new requirements affective February 18, 2003. xxx
10. Please rewrite your test details section of your report to come inline with the new ruels affective Feb 18, 2003. See pages 37 to 45.xxx
11. Please note that Part 24 power is EIRP not ERP. Please correct your report as appropriate.
12. Please remeasure you band edges for Part 24 using the specified settings in the new 24.238 rules affective Feb 18, 2003. xxx
13. Please note that spurious emissions is an EIRP measure not ERP. Please correct your data to show substation using EIRP. xxx

14. Please note that 24.238 has changed as of Feb 18, 2003. Please correct your report test descriptions to come in line with the new rules affective Feb 18, 2003. xx

Dennis Ward
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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.