



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

June 7, 2004

RE: FCC ID: APYNAR0057_ATCB001405
Attention: Yukari Ito

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 note that as this is a licensed device the operational description needs to be more complete than a technical specification. Please note that operational descriptions need to explain just how the device functions. Please provide an operational description that addresses the requirements of 2.1033(c)(10).
2. Please note that on pages 7 and 8 of the report you state ERP power. Please note that part 24 devices must be measured for EIRP. Please explain.
3. FYI – no action needed. Please note that only the upper most and lower most band edges need to be plotted to show compliance.
4. Please note that in the radiated spurious emissions table on pages 28, 29 and 30 of the report you state that a dipole was used below 1GHz. However, at the lower end you state dBi gain factors of -26, -14 and -8dBi. As a dipole tuned to the proper frequency has a 2.14dBi gain, please explain these numbers.
5. Please note that the SAR photos show that during body worn configurations the phone was in the flip open position. Can this device operate in a body worn configuration in the closed condition? If the device can operate in a body worn configuration in the closed condition, please provide SAR data in that position. Alternately, please explain the steps taken to verify that the flip open condition is worse case.

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.