May 3, 2001

Federal Communications Commission
Equipment Authorization Division
Applications Processing Branch
7435 Oakland Mills Road
Columbia, Maryland 21046

To: Steve Dayhoff sdayhoff@fcc.gov
From: Jay Sarkar j.sarkar@aprel.com

Subject: SAR Report

RE: FCC ID O2SNURIT3010RT
Applicant: Lipman USA, Inc.
FCC Correspondence No. 18771
731 Confirmation No. EA99891
Date of Original e-mail: April 06, 2001 12:24 PM

Dear Mr. Dayhoff

Pursuant to your e-mail to me, dated April 06,2001, I am forwarding to you our response. The relevant portion of the e-mail from FCC follows with our response inserted in the appropriate place

1. The dielectric parameters of the simulated tissue, as reported on page 11 of the SAR report, are not within tolerance of the specification. Please clarify.

Response: At the time, the tissue's dielectric properties were being maintained at 815 MHz:

> The dielectric constant of the tissue at 815 MHz was 54.1, giving a delta of -3.6% from the specification of 56.17.
>
> When calibrated at 899 MHz the dielectric constant was out of specification by a fraction.

2. The RF power readings listed in Table 1 on page 6 of the SAR report do not agree with the RF power output of the device reported in the EMI report. Please clarify.

51 Spectrum Way
Nepean, Ontario
Canada K2R 1E6

Visit Our Web Pages: www.aprel.com

Tel. (613) 820-2730
Fax (613) 820-4161
E-mail: info@aprel.com

Response: The RF power rating shown in Table 1 of the SAR report reflects the relative RF power only. This facilitates to monitor for possible drift in power during the test process, and therefore assess only the delta if any. This delta is used for the calculation of uncertainty. The actual power is shown in page 2 of the SAR report, 2.239W (ERP). The RF power shown in Table 1, is a conducted power and cable losses is not taken into account, where as the output power reported in the EMI report is the radiated power (ERP) with antenna gain etc.

Thanking you in advance for your kind cooperation.

Best regards,

Jay Sarkar
Technical Director, Standards and Certification