



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

January 27, 2005

RE: FCC ID: QTKRM-51_ATCB002090

Attention: Ole Sørensen

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 while section 7 of the SAR report shows head SAR data for the cheek and tilt positions, it appears that you have only provided SAR test plots and results for GPRS mode and one DCS head mode. A number of the GPRS modes state head phantom sections. This indicates that GPRS data mode could be used while held to the ear (i.e. voice capable). Currently however, GPRS is generally for data mode use and would be expected to be used to be used in body worn configurations. Please clarify the GPRS configurations (i.e. is it expected that GPRS would be used in voice communications while held to the ear or will GPRS mode only be body worn data configurations?)
2. In regards to item 1, Please provide the SAR data and plots for all appropriate head positions for GSM mode (i.e. right and left cheek; right and left tilt positions). Please also verify that SAR testing for these positions was performed at the maximum power levels.
3. Please note that GSM was tested only in the body worn configuration without the headset. Please explain why GSM mode was not tested in body worn configuration with the headset attached.

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.