



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

September 26, 2005

RE: FCC ID: QTLRH-74_ATCB002798

Attention: Robert Binder

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 the FCC requires that certain HAC information be provided in the manual when the phone is HAC compatible. Please note that in a review of the manual there is no apparent reference to the HAC other than the statement on page 64(pdf page) that says, "Some digital wireless devices may interfere with some hearing aids. If interference occurs consult your service provider." Please note that this does not meet the FCC required statement for HAC. Please note that the FCC has stated the following minimum information must be provided to the end user (this can be in the manual or label):
 - a) explains the HAC rating system for both WD and hearing aids and their use as a pair.
 - b) explains how to use the device including specific instructions about antenna positioning if applicable i.e. "the antenna should be extended for best compatibility...".
 - c) provides details of any special user selectable HAC modes. Acceptable modes might be back light off, BT off, Tcoil on, and similar. (RF power cannot be reduced and basic phone functionality must be preserved.)
 - d) Provide the M rating of the device (in this case M3).

Please provide a manual that addresses HAC requirements above. If this information is in the manual, please point to the specific page.

2. Please note that your listed uncertainty in the HAC report includes certain items that do not seem appropriate for the type measurement. For example the table includes certain SAR related issues such as phantom thickness, power drift etc and yet seems to leave out certain other HAC related issues. Please provide an uncertainty table that addresses only the HAC measurement.
3. Please note also that the FCC has stated that the expanded uncertainty is to be under 2dB. Please also note that in the table it appears that the uncertainty may exceed 3dB. This may be due to the use of unrelated SAR data. Please recalculate your measurement uncertainty for only the measurements involved.
4. Please note that the FCC generally questions measurement grids larger than 2mm. The HAC report does not appear to state the actual step size used. Please provide information on the step size used during testing.
5. Please note that it is not clear from the HAC report as to how large of a step size was used. Please note that a 5mm step, because of the uncertainty, may be too large and a smaller (i.e. 2mm) step size should be considered. Please explain and justify the step size used in the HAC measurement process.

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.