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To Company FAX	Joe Dichoso FCC	Date	6/10/99
From	C.K.Li	Page	2
		CC	

Ref	8168 (EA94053)
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Dear Mr. Dichoso,

With reference to you e-mail dated 6/10/99, we have submitted additional SAR data using the "touch position". The test setup photo is shown in figure 1 below:

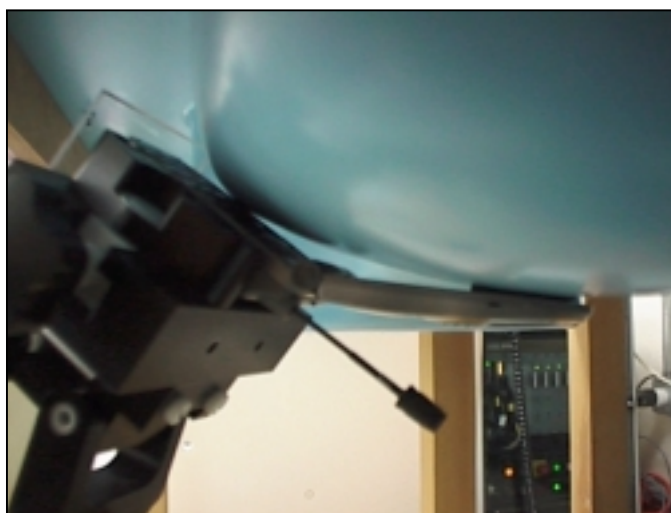


Figure 1 SAR test setup using TOUCH position

The SAR is 0.846 mW/g and the distance between the antenna connector and the Phantom shell is 22.5 mm. Please note that a SAR peak is found near the face (vertical wall) of the head.

By using manual scan from bottom of the phantom to the surface of the liquid, we confirm that worst case SAR data is located at the bottom position (close to the phone).

We trust these have answered the questions and would appreciate if you could grant this application ASAP.

Best regards,

C. K. Li

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HGP-230

Phantom: Generic Twin; Section: Left Hand; Position: (70°, 65°); Frequency: 1850 [MHz]
Probe: ET3DV5 - SN1333; ConvF(5.31, 5.31, 5.31); Crest Factor: 1.0; Brain 1900 MHz $\sigma = 1.81$ [mho/m] $\epsilon_r = 38.6$ $\rho = 1.00$ [g/cm³]
Cube 5x5x7; SAR (1g): 0.846 [mW/g]; SAR (10g): 0.445 [mW/g]; (Worst-case extrapolation)

Course: Dx = 20.0, Dy = 20.0, Dz = 10.0

Powerdrift: -0.21 dB, horizontal angle until touching head (70°). Antenna Out

