



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

March 9, 2005
RE: FCC ID: ATH2425191
Attention: Rick McMurray

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 statement in the manual about body worn accessories providing 2.5cm separation does not appear to be justified by SAR data. There is SAR data with the keypad facing the flat phantom and there is SAR data for the provided accessory with metal, but I cannot find a SAR setup photo with showing SAR configuration with the back of the transmitter facing the phantom. As this would be the most likely direction for the device in a holster or belt clip, this would most likely be the position which would justify the 2.5cm body worn separation distance for belt clips containing no metal. Please remember that the SAR data for the accessory containing metal may not be adequate justification for non-metallic accessories. Is this the configuration being used to justify non-metallic accessories? Please explain if or how the 2.5 cm gap with the keypad facing the phantom addresses the 2.5cm separation for non-metallic accessories with the back of the device facing the body.

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.