



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

July 18, 2007

RE: FCC ID: APYNAR0063_ATCB005173
Attention: Hironobu SHimoji / Keijiro Kumagai

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 package labeling is not required, the FCC has stated the following, "Labeling Requirements--Relevant user information should be provided that: is complete, clear and easily understood by a lay person. explains the HAC rating system for both WD and hearing aids and their use as a pair. explains how to use the device including specific instructions about antenna positioning if applicable i.e. "the antenna should be extended for best compatibility...". 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.) Please note that as this device has HAC the manual must provide hearing aid compatibility information sufficient to meet the above FCC requirements. This information should state the HAC T and M rating as well as provide HAC information. Please explain and direct where HAC is addressed in the manual. Please include this information if not already in the manual.
2. Please note that the FCC has stated that HAC testing is to be done to the ANSI C63.19-2006. Please explain why pages 1 and 3 of the report claims compliance to the 2001 version. Please correct and retest as necessary to comply with the 2006 version.
3. Please explain why the SAM Phantom is referenced in the HAC report. Please provide system information specific to HAC testing. See page 5 of the HAC report
4. Please explain why you are using a dosimetric probe calibrated for liquid use. Please provide system information specific to HAC testing. See page 5 of the HAC report
5. Please provide the EUT orientation and layout on the plots.
6. Please provide the Probe Modulation Factor plotted data. This is an FCC requirement.
7. Please note that the FCC has stated that system accuracy is to be within 10% of the manufacturers calibrated dipole target values and not the table values from the standard. It appears as if the SAR report uses the standard values and not the dipole values. Please correct the report to show proper reference values using the dipole calibrated target reference values.
8. Please note that the proper measurement for SAR with a phone containing a BT device is to measure the highest SAR with the phone and then turn the BT device on and remeasure. The SAR report appears to have simply added the two highest SAR values. Please explain and please measure the highest Phone SAR with the BT device active.

Dennis Ward

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.