



June 2, 2004

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W.  
Washington, DC 02554

**Re: Notice of Oral Ex Parte Discussion in Docket No. ET 03-137**

Dear Ms. Dortch:

On May 25, 2004, Chuck Eger, Timothy Harr, Fred Moloznik and John Welch, from Motorola, Inc., met with Bruce Franca, Bruce Romano, Robert Cleveland and Ira Keltz to discuss issues related to the above-referenced proceeding.

The points raised in the meeting included:

1. The scientific and policy rationales for taking into account measurement uncertainty of SAR values when determining whether a Class II permissive change filing should be made for an authorized Part 15 transmitter module used in a new host device;
2. Effective occupational-user RF awareness methods and the distinctions between users of Part 90 portable and mobile devices and workers at antenna sites as regards the need for additional special considerations for occupational use, and;
3. The possibility that the proposed generic reference to Supplement C of OET Bulletin 65 in the rules may be misconstrued as a regulatory mandate and why the option of referring to relevant IEEE and IEC SAR measurement standards would be preferable.

I am filing this letter in the EFCS system.

Sincerely,

A handwritten signature in black ink that reads 'John F. Welch'.

John F. Welch  
Vice President and Director  
Global EME Government Relations

JFW:amdes

Cc: Bruce Franca  
Bruce Romano  
Ira Keltz  
Robert Cleveland