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May 18th, 2000. ELECTRONIC FILING TO FEDERAL COMMUNICATIONS
COMMISION: ATTENTION: ERROL CHANG

APPLICANT: NOKIA MOBILE PHONES: FCC ID: LJPNSB-6NY
EA96734 Correspondence Ref. 13918

Errol Chang:

Please note that William H. (Bill) Graff is no longer employed by M.FLOM ASSOCIATES, INC. Any e-mail should be addressed ONLY to general@mflom.com and NO OTHER. Thanks.

In reply to the referenced correspondence 13918, concerning the SAR review of this application:

1. SAR INFORMATION BY APPLICANT IS ATTACHED.

According to Nokia, who have referenced the FCC website, it shows muscle tissue permittivity higher than brain tissue permittivity and conductivity lower than brain tissue. If $SAR = E \times E \times \sigma$ divided by permittivity is still valid, then would it not follow that a lower sigma and a higher permittivity would result in a lower SAR?

Conversely, a higher sigma and a lower permittivity would result in a higher SAR; or worst case, i.e. worst case using brain tissue liquid? Your comments please.

2. Nokia advises that the carrying case does not permit display and keypad to face away from flat phantom.

3. Separation distance is shown in Nokia's reply. No belt clips are provided.

4. See Appendix 1 for revised page in User Guide.

Errol: We would appreciate any speed of review that you can give this application submitted February 9th, 2000 and the delays are proving very costly to the Applicant.

Sincerely yours, MORTON FLOM, P. Eng. President, MFA INC.

