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November 17, 2000

Federal Communications Commission
Authorization & Evaluation Division,
7435 Oakland Mills Road
Columbia, MD. 21046

Attention: Kwok Chan, Joe Dichoso

RESPONSE TO FCC CORRESPONDENCE 17110

Here is our reply to your correspondence 17110 concerning LJPNSB-7 Class II Permissive Change.

Sincerely,

Kare Oksanen
Engineering Manager, Type Approvals
PCC Oulu, Nokia Mobile Phones

1. The only modification done to CSH-3 carrying case was changing the belt hook material from metal to plastic. There is no changes in dimensions or shapes. Thus everything specified in the original application concerning positioning the phone in the carrying case applies also to the modified CSH-3.

2. LJPNSB-7 cannot be mounted directly to the belt-clip provided with CSL-10, but only with the carrying case CSL-10. There is no counterpart available for LJPNSB-7 to be used with that belt-clip alone. However, the same multi-purpose belt-clip has been provided with other body-worn accessories to be used with other products than LJPNSB-7. We consider CSL-10 to be a carrying case, which consists of these two parts.

   Because of the above, we request Proposed Grant Conditions to be modified as follows:

   Output is EIRP. This filing adds a~~n additional belt-clip and~~ carrying case to the original approval. SAR compliance for body-worn operating configurations is limited to the three specific carrying cases and ~~two~~ **one** belt-clip tested for this device. The leather carrying cases approved n the original filing have been tested for SAR compliance only with the display and keypad of this device facing a user's body; therefore, by design, these carrying cases must only support normal transmission for

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body-worn use under this operating configuration. End-users must be informed of the body-worn operating requirements for satisfying RF exposure compliance. The highest reported SAR values for all filings approved under this FCC ID are - Head: 1.09 W/kg; Body-worn: 0.54 W/kg.

3. We have recognized your concern and studied already for several months possibilities to change simulating liquids to match better the requirements of the FCC even though especially the content of muscle simulating liquid has been particulary demanding to the equipment used in SAR testing. At the same time we have carried out tests to find a proper solution, we have been waiting for OET and SCC34 committee to finalize their recommendation to new liquid recipes to prevent continuous probe calibrations. If the FCC considers the current SCC34 proposals to be adequate to be used in SAR measurements, we start process to update our current SAR measurement system to fulfill the current FCC requirements with as short transition time as possible.