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

February 18, 2002

RE: Nokia Corporation

FCC ID: PDNRAB-3N

I have a few comments on this Application.

1.) Radiated Carrier Output Power test appears to have been performed using a field strength measurement converted to EIRP. This is not acceptable to the Commission. Only the substitution method at the carrier frequency similar to that used for your Spurious Emissions test is satisfactory. Please note that testing on a standard .8M high tabletop may produce unreliable results because of ground reflections. Be sure to identify the signal source used to feed the substitution antenna.
2.) If available, a chart of EUT antenna gain over frequency within the 1850-1910 MHz PCS band would be helpful.
3.) Test Equipment listed on pp. 20 of 26 appears to be out of calibration. Please advise.
4.) Please provide justification for 256K necessary bandwidth. A plot showing measured values would be appropriate.
5.) This device appears capable of transmitting high speed data. If so, then can it transmit across multiple time slots? Assuming it can, this could affect the total mean power and SAR probe crest factor. Please advise.
6.) Measurement uncertainty does not appear to conform with FCC's current recommended practice. Please review.
7.) FYI: Tissue fluid temperature for each test printed on each plot is advisable.
8.) What is the expected range for RF Pout in production? SAR values can be scaled up to 5% from measured values to cover "worst case" conditions.

William H. Graff
President and Examining Engineer

mailto: whgraff@AmericanTCB.com

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.