

Nokia Mobile Phones – San Diego
Klaus Kettunen

September 2, 2003

September 02, 2003

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

Re: Nokia Mobile Phones

FCC ID: QMNRH-34

Dear Mr. Ward,

Following are our responses to your correspondence dated August 27, 2003:

- (1) SAR 1.18 W/kg in the manual is correct. We noticed that in some of the scans conductivity number 0.91 has been entered to measurement system as density. Those plots were re-evaluated with correct density number, but obviously, we have filed the report with the error. Please find the correct SAR report in the attachment.
- (2) The SAR drift of the touch/right/ch1175 scan is unexpected for this product. We are not able to explain what has caused the difference of the magnitude between SAR of the reference point at the beginning of the scan and at the end of the scan at the same point. From the whole set of measurements of head/1900 MHz it can be concluded that the scan with the highest drift has rather overestimated than underestimated SAR. The other three configurations have given higher SAR on mid channel than on the highest channel and touch position on left side has given 19% higher SAR on mid channel than on the highest channel. Remeasurement of touch/right/ch1175 scan would not change highest SAR number or compliance status.
- (3) The block edge plot on Page 14 marker value (13.521 dBm) shows that the EUT is below the -13 dBm limit; therefore, in compliance with FCC rules.
- (4) The block edge plot on Page 16 marker value (15.409 dBm) shows that the EUT is below the -13 dBm limit; therefore, in compliance with FCC rules.
- (5) Necessary audio and modulation limiting data per 47CFR2.1047 has been uploaded to ATCB website.
- (6) The SAR lab is not capable of measuring radiated power. The EMC and SAR tests were run on the same sample. The ERP and EIPR values were measured by the EMC lab (PCTEST Engineering Laboratory, Inc.) and those values are valid also for SAR testing, as the same sample was used in both measurements.

We hope that the above response is sufficient to complete the review of this application and subsequently the grant of this application.

Klaus Kettunen, Product Certification Officer
Nokia Mobile Phones, San Diego