

RESPONSE TO COMMENTS DATED 8-23-2005 1 (1)

FCC ID QMNRM-66 ATCB002700 Michael Mobley

9/9/2005

- 1) Thank you for this information. Several years ago Nokia Legal worked with the FCC to allow us to use a reduced part 15 compliance statement, and since that time virtually all our products have used this reduced text.
- 2) See updated report.
- 3) See updated report.
- 4) See updated report.
- 5) This question has been clarified via email discussion. What follows is the response to the clarified question (which, to paraphrase, is why is there a difference in channel between the highest head SAR and body SAR in the 800 MHz AMPS results).

One potential reason why the worst case SAR in AMPS for head occurs at channel 799, and for body occurs at 991 is that the gain pattern and near-fields could shift slightly as the frequency changes. Keep in mind that the head SAR will be impacted mostly by near-fields or antenna beams pointing toward the head, while body SAR will be impacted mostly by near-fields or antenna beams pointing away from the head. So for example, perhaps at channel 799, more antenna beam toward the head is slightly higher then the antenna beam away from head, and at 991 the antenna pattern changes slightly and now the antenna beam away from the head is slightly higher than the antenna beam toward the head. This type of change over frequency could easily explain why the highest head SAR occurred at one channel, and the highest body SAR occurred at another.

Another potential reason why the lowest channel doesn't have the highest head SAR is that the antenna is simply not as efficient at the low channel.

Another potential reason is that the attachment of a headset accessory could change the radiation pattern of the phone and possibly the frequency tuning of the phone as well.