

April 3, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Mr. Martin Perrine

SUBJECT: Nokia Mobile Phones Inc.
FCC ID: GMLNHP-2AX
731 Confirmation No.: EA429550
Correspondence Reference No.: 22446
Request for Tech. Info.: 03/27/02

Dear Martin:

Transmitted herewith, on behalf of Nokia Mobile Phone Inc., is an amendment provided in response to the request for technical information dated March 27, 2002.

Nokia's response is as follows:

1. We would like to confirm the following conducted power:
 - a. AMPS – 27.0dbm
 - b. CDMA – 25.5dbm
 - c. PCS – 24.0dbm
2. We would like to inform you that the SAR testing in the CDMA 800MHz mode (25.8dbm) was performed at a conducted value that is slightly higher than the production target. This setting will result in overestimation of SAR level and therefore is on the side of caution and should not have any effect on compliance.
3. The measured liquid parameters listed for 900MHz were correct for validation on page 10 of 23 in the SAR report. The same values have been used incorrectly for actual head-SAR measurements. The correct measured liquid parameters on page 11 of 23 for all head SAR scans are 0.90 S/m conductivity and of 39.6 relative dielectric constant for 835 MHz, and 1.45 conductivity and 38.5 relative dielectric constant for 1890. The measurement files of maximum SAR results on 800MHz and 1900 MHz bands have been re-evaluated with the correct liquid parameters. The maximum AMPS result changed from 1.20W/kg to 1.13W/kg and maximum CDMA/1880 result changed from 0.745W/kg to 0.798W/kg. The user Guide will be updated to reflect the change in maximum head SAR value from 1.20 W/kg to 1.13 W/kg.
4. The probe 1429 used for original measurements was compared to a probe 1431 having conversion factors for body liquid. Dipole was used to generate stable RF field for the comparison measurement. The results are the following:

CDMA 800MHz Band	Probe 1431 1g 3.06mW/g
	Probe 1429 1g 2.93mW/g
PCS 1900MHz	Probe 1431 1g 9.93 mW/g
	Probe 1429 1g 8.71 mW/g

When the original body-SAR results are scaled by the difference, the results are:

CDMA 800MHz Band Body-SAR:
 $3.06/2.93 \times 0.363 \text{ W/kg} = 0.379 \text{ W/kg}$

PCS 1900MHz Band Body-SAR:
 $9.93/8.71 \times 0.227 \text{ W/kg} = 0.259 \text{ W/kg}$

With frequency range covering the US 800 and 1900 MHz bands the probe is expected to have 9.5% uncertainty. That would change expanded uncertainty from 24.23% to 27.55%.

The Users Guide will be updated to reflect the change in maximum body SAR value from 0.363 W/kg to 0.379 W/kg.

We trust this information is sufficient to re-issue the grant ASAP. If you have any further questions, please do not hesitate to contact us.



Randy Ortanez
President

cc: **Nokia Mobile Phones Inc.**