



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

February 26, 2002

RE: Nokia Mobile Phones

FCC ID: GMLNSD-5FX

I have a few comments on this Application.

- 1.) Section 3.2, 3.3, 3.4: does not apply to any PCS – Band only Part 24 phone. Constant envelope digital emissions are not affected by variations of audio input.
- 2.) Section 3.6 does not apply to any Part 24 digital phone.
- 3.) Section 3.7 second paragraph does not apply to any Part 24 digital phone. In addition, the final sentence of paragraph one is also irrelevant.
- 4.) Section 4.0: Was the device set to a “power off” condition when incrementing the temperature?
- 5.) Section 5.2: Please provide conducted Pout values loaded on the antenna which provide these EIRP values. There are also contradictory references to ERP and EIRP. In addition, please provide the measurement bandwidth settings used.
- 6.) Section 10.1 Sample Calculation B applies satisfactorily to ERP readings but not EIRP. Part 24 requires this limit to be expressed in terms of EIRP. Assuming this calculation was used implicitly for transmitter radiated emissions, there would be an error.
- 7.) FYI: Please note that for SAR testing the FCC recognizes OET Bulletin 65, Supplement C and only uses IEEE P1528 as a reference. Front page of SAR report should be revised
- 8.) SAR report indicates only one battery is used. This is contrary to pp.109 and 120 of Manual. Please resolve and retest if necessary.
- 9.) FYI: There is no such thing as Extended Uncertainty – the correct term is Expanded Uncertainty.
- 10.) In addition to the date, it is recommended that temperature of the tissue medium be shown on each plot. Temperature for all plots should stay within +/- 2 C.
- 11.) Both the left and right hand tests tilt position were performed on the same date [01/31/02] but the left hand side shows powerdrift of 0.00 db while the right hand side shows -0.22 db. In addition, body worn test shows a power gain of 0.14dB. It is difficult to imagine that power on a CDMA phone would vary from max to min by .36dB. Since Local Modes were used for testing per Operational Description, I find the variation in power confusing. Please address.
- 12.) Section 4.3 indicates SAM v4.0 phantom was used. Test plots identify SAM 1. Which is correct?
- 13.) Manual must indicate only CSL-28 beltclip approved for this device. In addition, please list separation distanced between phone and body. Can it be assumed that operation of this device when inside a shirt or pants pocket is not recommended? If so, please indicate as well in manual.
- 14.) No data presented using headset HDC-5.
- 15.) Reported SAR values should be stated in manual.

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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.