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04/26/2004

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731 Confirmation Number: TC194111
Date of Original Email: 04/23/2004

Subject: Request for additional information

1) Please clarify if the 1900 MHz band mode can have 1 or 2 time slots. Clarify the corresponding state of radiated power measurement on page 9 of 49 of EMC report. Provide data for the other time slot condition as appropriate. Provide SAR data for both conditions as appropriate.

GSM1900 has also 2-time slot mode available, but to answer this question, please see Exhibit 10: tune-up procedure section 2.3.5 for background information. This explains, why in GPRS850 mode both time slot conditions were measured, but in GPRS1900 mode results in EMC report represent them both, and in SAR report only 2-time slot condition was used.

2) SAR report states that tests codes were used to control the device. Please provide details of power setting to assure that the device was operating at the same power during EMC testing.

We use special control software to operate device under desired mode, band, frequency and power level. After selected operating mode and band, this software provides drop-down list of all available power levels in selected mode/band, in which highest is selected both in SAR and EMC testing.

3) Please provide SAR results for all modes for all test configurations in accordance with Supplement C and PN 02 1438. In particular GSM 850 but also EGPRS modes.

In Supplement C 01-01 'Device operating modes' section it is said

'For devices that operate in multiple modes within the same frequency band, all modes with a maximum source-based time-averaged output within 1.0 dB of the mode with the highest output should be tested to demonstrate compliance.'

Please refer to both EMC report page 9 of 49 and tune-up procedure sections 2.3.4 and 2.3.5 to compare power output in these modes to justify why EGPRS mode was not measured.

At the time of our first EGPRS product, EGPRS mode was measured as well, and no significant difference between EGPRS/GSM was noticed after power output/used time slot differences were compensated. Please see our earlier application FCC ID: LJPNPL-3.

Therefore, we still trust that we have already provided SAR results according to FCC guidelines in Supplement C.