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FEDERAL COMMUNICATIONS COMMISSION: Attention: ANDY LEIMER

Reference: NOKIA MOBILE PHONES: FCC ID: LJPNSB-7 (Model 8290) EA97165. Corresp. 13864

Andy:

Please note that William H. (Bill) Graff is no longer employed by us. Any e-mail should be addressed ONLY to general@mflom.com and NO OTHER. Thank you.

In reply to your questions concerning the SAR review of this application:

1. SAR INFORMATION BY APPLICANT IS ATTACHED.

According to Nokia, who have referenced the FCC website, it shows muscle tissue permittivity higher than brain tissue permittivity and conductivity lower than brain tissue. If $SAR = \frac{\sigma}{E_x^2 \times \epsilon}$ sigma divided by permittivity is still valid, then would it not follow that a lower sigma and a higher permittivity would result in a lower SAR?

Conversely, a higher sigma and a lower permittivity would result in a higher SAR; or worst case, i.e. worst case using brain tissue liquid? Your comments please.

2. Nokia replies that the carrying case does not permit display and keypad to face away from flat phantom.

3. Separation distance is shown in Nokia's reply. No belt clips are provided.

4. See Appendix 1 for revised User Guide.

5. See Appendix 2 for hand data.

We trust that the foregoing and attached now meets the requirements of the Commission and that the Grant will be authorized - time is critical for this application.

Sincerely yours, MORTON FLOM, P. Eng. President MFA INC.

May 18th, 2000.