

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Kwok Chan / Andrew Leimer:

Please find attached our reply to your correspondence concerning LJPNSB-7 (EA97165, correspondence reference number 14256). The original text is followed by our highlighted response.

Regards,

Kare Oksanen
Engineering Manager, Type Approval
Nokia Mobile Phones, PCC Oulu

1. Please provide photos or other illustrations indicating the phone can only be placed in the proposed carrying holsters with its keypad /display facing the user when transmitting in body-worn configurations. Otherwise, additional SAR compliance results would be needed.

The bottom connector is available for headset when LJPNSB-7 is positioned in the carrying cases so that the keypad and display are facing the user. This is shown in Picture 1.



Picture 1. LJPNSB-7 positioned keypad/display facing the user

Applicant: Nokia Mobile Phones

FCC ID: LJPNSB-7

Correspondence Reference Number: 14256
731 Confirmation Number: EA97165

If LJPNSB-7 is positioned in the way that its keypad and display are facing away from the user, the bottom connector will not be available without misusing the carrying cases (Picture 2). Thus having a call while having LJPNSB-7 in the carrying case is reasonable only when keypad and display and facing the user.



Picture 2. LJPNSB-7 positioned keypad/display facing away from the user

2. FYI - Only two carrying holsters and one belt-clip were tested for body-worn SAR compliance. The currently proposed body-worn operating instructions allows any Nokia approved accessories. Nokia may consider clarifying the instructions to indicate specific accessories; suggestion - "..., attach the phone to the specific Nokia belt-clip or place the phone in the specific Nokia carrying cases that have been tested for compliance. Use of non-Nokia-approved accessories may violate FCC RF exposure guidelines and should be avoided.".

We accept your suggestion. This paragraph will be changed as follows:

For body worn operation, to maintain compliance with FCC RF exposure guidelines, use only Nokia approved accessories. When carrying the phone while it is on, attach the phone to the specific Nokia belt-clip or place the phone in the specific Nokia carrying cases that have been tested for compliance.

Use of non-Nokia-approved accessories may violate FCC RF exposure guidelines and should be avoided.

3. FYI - Even at 6 GHz, muscle-equivalent dielectric constant... (a *very long explanation was deleted here to save some space*)... For the current filing, there is sufficient SAR margin in the measured results which we do not believe the difference in tissue dielectric parameters could result in non-compliance conditions; therefore, additional testing is not requested.

Please test SAR with appropriate tissue dielectric parameters as inappropriate tissue parameters may not be accepted for future filings.

We understand your concern and we will try to find to the best of our abilities a more suitable tissue simulating liquid for the future filings.

4. FYI - the response provided by the test lab had incorrectly substitute permittivity for tissue density in the SAR equation. Please note that any error or misunderstanding of this basic SAR equation could have significant effects on all SAR evaluations.

Thank you for pointing this out. We have discussed this with the test lab and they will no longer make modifications in regards to SAR evaluations without our approval.