

Nokia Inc.  
EMF Team

August 7, 2008

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

Re: QEYRM-247\_ATCB006599

Dear Mr. Ward,

The following is our response to your correspondence dated August 5, 2008 questions 2 and 3:

The power levels given in the SAR report are identical to those given in the EMC report, but please note that both reports give peak power levels only.

SAR is proportional to average power and not to peak power. Therefore, 1-slot GSM at X dBm peak power will produce the same SAR value as 2-slot GPRS at X-3.0 dBm and both will give the same SAR value as 3-slot GPRS at X-4.8 dBm. That is to say, a product can produce a higher SAR value in 3-slot GPRS mode even when its peak power is up 4.8dBm below 1-slot GSM mode.

It may seem arguable that the maximum SAR has been found for RM-247 without measuring the mode with the highest peak power, but we attest that the testing logic employed ensures that the maximum SAR values have been found. Specifically, Head SAR testing in both bands started with a comparison of SAR values for 1-slot, 2-slot and 3-slot modes for the identical test setup (Slide closed, mid-band in this case) to determine which of the transmit modes produced the highest average power i.e. gave the highest SAR. In both bands 3-slot GPRS mode produced the highest SAR/highest average transmit power. Consequently, as the power into the antenna is independent of slide position, full SAR testing for all slide positions was subsequently carried out in 3-slot GPRS mode only.

Body SAR testing was limited to 3-slot GPRS mode as Head SAR testing had proven that this mode gave the highest average power/highest SAR.

We attest that the SAR report gives the maximum Head and Body SAR values for the RM-247 in both bands."

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