

Nokia Mobile Phones – San Diego
Victoria Abadilla

December 16, 2005

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

Re: Nokia Mobile Phones

FCC ID: QMNRM-125
Dear Mr. Ward,

Following is our response to your correspondence dated December 13, 2005, 8:30 AM

- (1) **Response:** Report has been correction, will upload.

Following is our response to your correspondence dated December 13, 2005, 9:23 AM

- (2) **Response to item 5,**

The power drift is measured by the system by measuring the field at the reference location twice - before the test and after, the difference would be the drift measurement. This is briefly explained in the Section 8. It is required that the drift should not exceed 5%, this should correspond to approximately $\pm 0.4\text{dB}$. Example of how drift was calculated - for the case when the drift was -0.329dB . The reference measurements were 68.93V/m and 66.37V/m - The % difference between these 2 measurements is $(2.56/68.93) * 100 = 3.72\%$ approximately which is less than the 5% limit.

- (3) **Response to item 7**

Thank you for this information. We are aware that C63.19 does not address simultaneous transmission regarding HAC, however, we feel that treating this testing in a manner similar to SAR testing is appropriate, as the results shown are definitely the worst case. BT is shown to have no measureable effect on the results in theory and practice, and therefore this product exceeds the the minimum FCC HAC requirements. We understand that the FCC may query these results, but we believe these results are valid and will respond appropriately to the commission if it becomes necessary.

- (4) **Response to item 8**

See chart below for the following modes

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12/15/05 W. Frank
3.7V, 25C.
Azul B3.0 #033/06001690
HWID 3000

CELL Band	CH1013			CH384			CH777		
	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)
RC1 (TCH)	24.76	28.37	3.61	24.85	28.31	3.46	24.76	28.17	3.41
RC2 (TCH)	24.75	28.37	3.62	24.81	28.30	3.49	24.76	28.15	3.39
RC3 (Pilot)	24.65	27.68	3.03	24.75	27.67	2.92	24.72	27.55	2.83
RC3 (Pilot)	24.80	29.00	4.20	24.83	28.93	4.10	24.76	28.77	4.01
RC3 (Pilot)	24.83	29.05	4.22	24.85	28.98	4.13	24.82	28.85	4.03
RC3 (Pilot)	24.81	28.86	4.05	24.85	28.80	3.95	24.82	28.68	3.86
RC3 (Pilot)	24.78	28.53	3.75	24.80	28.67	3.87	24.74	28.52	3.78
RC3 (Pilot)	24.72	28.53	3.81	24.77	28.49	3.72	24.73	28.35	3.62

PCS Band	CH25			CH600			CH1175		
	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)	Pavg (dBm)	Ppeak (dBm)	PAR (@1% CCDF) (dB)
RC1 (TCH)	22.89	26.64	3.75	22.86	26.63	3.77	22.64	26.09	3.45
RC2 (TCH)	22.94	26.69	3.75	22.84	26.64	3.80	22.61	26.10	3.49
RC3 (Pilot)	22.83	25.99	3.16	22.78	26.02	3.24	22.66	25.62	2.96
RC3 (Pilot)	22.87	27.19	4.32	22.68	26.99	4.31	22.49	26.57	4.08
RC3 (Pilot)	22.80	27.15	4.35	22.62	26.96	4.34	22.50	26.56	4.06
RC3 (Pilot)	22.89	27.07	4.18	22.72	26.91	4.19	22.58	26.52	3.94

We hope that the above response is sufficient to complete the review of this application and subsequently the grant of this application.

Michael Mobley, Product Certification Officer
Nokia Mobile Phones, San Diego