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November 13, 2006

Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046-1609

To: Office of Engineering and Technology Laboratory

Re: FCC ID: QMNRM-66
Applicant: Nokia Inc.

REQUEST FOR PERMISSIVE CHANGE CLASS II

Hereby we request pursuant to 47CFR 2.1043 and 47CFR 20.19, a permissive change class II for, FCC ID QMNRM-66 to add HAC T-coil rating and update user guide, please see attached test report(s) and user guide.

Please see also on the next page our response to the request for additional information we got during the initial submission via the TCB on Oct. 06, 2006.

Please contact us in case of additional questions.

Sincerely,

Andreas Gillmeier

Digitally signed by Andreas Gillmeier
DN: CN = Andreas Gillmeier, C = US, O = Nokia Inc., OU = Certification Management
Reason: I am signing this document
Date: 2006.11.16 10:14:41 -08'00'

Andreas Gillmeier
Product Certification Officer
Nokia Inc

Original correspondence Reference Number: 32455
Original 731 Confirmation Number: TC161103

Item 1 = The permissive change cover letter does not describe the changes made to the device. Please update.
Response: There were no changes made to the device. The permissive change was to add T-coil rating for the above FCC ID.

Item 2 = Please readdress the filing relative to the FCC 3G policy to include description of the phones capabilities and modes of operation. Modes that support at ear voice use should be further investigated as part of subset testing justification for HAC. Please provide additional related information to support SAR testing in accordance with FCC policy.

Response:

- SAR testing of QMNRM-66 was carried out in RC2/SO9 mode.
- Power detection integral to QMNRM-66 is peak detector with averaging capacitor. Power control based on such power detection is somewhat sensitive to PAR (peak-to-average-ratio). Time-averaged maximum output power and SAR tend to be highest in modes having lowest PAR. The device has SW compensation, which keeps the variations due to PAR differences in different modes of the time-averaged maximum output power to less than 0.2 dB.
- The sample used for SAR testing has power level set 0.2 dB higher than mass production tuning target.

Item 3 = Please reload the test setup photo. The file appears to be corrupted.
Response: An updated test setup photo file has been uploaded.

Item 4 = Please provide the applicable user manual information.
Response: Please see the UG page 127 (in Adobe Acrobat: page 125).

Item 5 = Please provide the required validation results for 80% AM.
Response: 80% AM validation results are on page 29 of the E&H test report.

Item 6 = Please confirm that no more than 5 exclusion blocks were used between any E&H result combination.
Response: It is confirmed that no more than 5 exclusion blocks were used between any E&H result combination.

Item 7 = Please provide more details about how the RF field result centered on the T-coil was obtained. A separate 5x5 scan is required if the T-coil is not centered on the speaker.
Response: A separate 5x5 scan was done centered on the Tcoil spot. Results are on page 32 of the E&H test report.

Item 8 = Please provide the T-coil contour plots.
Response: T-coil contour plots are included in the test setup document uploaded.

Item 9 = It appears that this device has user control for frequency response if so dismissal may be necessary. Separate action will be taken.
Response: The user control for T-coil is only limited to activate a different pre-programmed set of audio equalizations when activating the T-coil mode. The user has no way of changing the pre-programmed equalization values. Since the dismissal of this application, Nokia is hereby applying to the Commission for the approval of the permissive change class II grant for T-coil.