



May 23, 2002

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Diane Poole

**SUBJECT: Novatel Wireless Inc.
FCC ID: PKRNVWC201
731 Confirmation No.: EA102051
Request for Additional Information**

Dear Diane:

On behalf of Novatel Wireless Inc. is our response to item 1 of your e-mail dated May 23, 2002 requesting additional information for the subject application.

1. The manufacturer's specified probe conversion factors at 1800MHz are 5.78 for head and 5.36 for body. The manufacturer's specified probe conversion factors at 1900MHz are 5.66 for head and 5.25 for body. A re-evaluation of the highest SAR value for the EUT using 1900MHz body probe conversion factor increased the measured SAR by approximately 10% from 1.05 w/kg to 1.16 w/kg (see attached SAR plot). The highest extrapolated SAR value due to phantom thickness increased from 1.18 w/kg to 1.32 w/kg.

The manufacturer's E-field probe conversion factors were determined as follows:

- a). In brain and muscle tissue between 750MHz and 1GHz, the conversion factor decreases approximately 1.3% per 100MHz frequency increase.
- b). In brain and muscle tissue between 1.6GHz and 2GHz, the conversion factor decreases approximately 1% per 100MHz frequency increase.

If you have any further questions or comments concerning the above, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn McMillen".

Shawn McMillen
General Manager
Celltech Research Inc.
Testing & Engineering Lab

cc: Novatel Wireless Inc.

Novatel Wireless Inc. FCC ID: PKRNVWC201

Generic Twin Phantom; Flat Section; Position: (90°,180°)

Probe: ET3DV6 - SN1590; ConvF(5.25,5.25,5.25); Crest factor: 1.0

1900MHz Muscle: $\sigma = 1.39$ mho/m $\epsilon_r = 54.6$ $\rho = 1.00$ g/cm³

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Cube 5x5x7; Powerdrift: -0.07 dB

SAR (1g): 1.16 mW/g, SAR (10g): 0.693 mW/g

Body SAR at 1.5cm Separation Distance

Novatel Model: NVW-C201

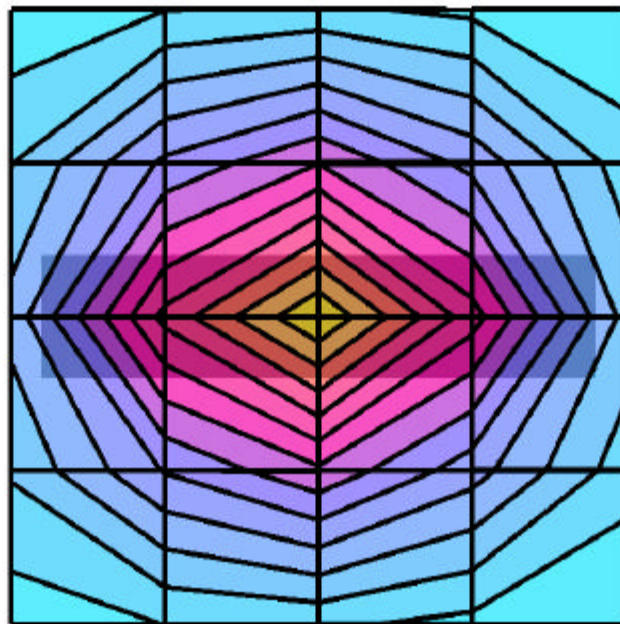
Wireless Modem Card

PCS CDMA Mode

Channel 0600 [1880.00 MHz]

Conducted Power: 24.5 dBm

Date Tested: August 20, 2001



SAR_{Tot} [mW/g]

