NOKIA

RESPONSE TO ATCB
FOR GMLRH-40

20-June-03

1) Please see updated photo (Phantomtype_singlebd.JPG)

2) See attached active device list (RH-40 Active Devices.pdf)

3) Thank you for the clarification. The voltage input to the amplifier stages is the battery voltage - 3.6V.

4) The submission was made prior to the FCC's clarification of this rule part. Retroactive enforcement of this clarification is not in accordance with the FCC's time to market initiative.

5) Emission Designator = 40K0F8W
Calculation: Voice + SAT
Modulation: Voice is 2.5 kHz and SAT is 6 kHz — Maximum modulation is M = 6 kHz
Deviation: Voice is 11.3 kHz and SAT is 1.85 kHz — Maximum deviation is D = 11.3 + 1.85 = 13.15 kHz
Bn = 2xM + 2xDK with K = 1
Bn = 38.30 kHz

Calculation: Signaling Tone (ST) + SAT
Modulation: ST is 10 kHz and SAT is 6 kHz — Maximum modulation is M = 10 kHz
Deviation: ST is 7.69 kHz and SAT is 1.85 kHz — Maximum deviation is D = 7.69 + 1.85 = 9.54 kHz
Bn = 2xM + 2xDK with K = 1
Bn = 39.08 kHz

Emission Designator = 40K0F1D
Calculation: Voice + SAT
Modulation: Wideband Data is 10 kHz and SAT is 6 kHz — Maximum modulation is M = 10 kHz
Deviation: Wideband Data is 7.59 kHz and SAT is 1.85 kHz — Maximum deviation is D = 7.59 + 1.85 = 9.44 kHz
Bn = 2xM + 2xDK with K = 1
Bn = 38.88 kHz

6) Please refer to attached plots (0023 OBW.pdf and 0029 OBW.pdf)

7) Please refer to attached plots (0023 OBW.pdf and 0029 OBW.pdf)

8) 2700 Hz is specified in the EIA/TIA spec and should be acceptable.

9) Your comments are noted, thank you; we are prepared to take the risk with this submission.

10) When conductivity is higher than recommended, SAR results are overestimated. This conclusion is also supported by System Accuracy Verification result of 26-Feb-03, which is 9% higher than the Reference Result. The maximum SAR results, 1.19 W/kg for BOM1 and 1.23 W/kg for BOM2, have been measured on 21-Feb-03. Repeat of 26-Feb-03 measurements would not change status of SAR compliance or level of maximum results.
.