



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

February 6, 2003

RE: FCC ID: GMLRF-14

Attention: Nerina Walton / Alan Ewing

I have a few comments on this Application.

1. The internal photos are not clear. Especially page 4. Please provide clear internal photos. xxx
2. The SAR report states that a 22mm (2.2cm – 1 inch) separation was provided in Body SAR testing. On page 92 of the manual you clearly show the device on the belt loop of a person. This would appear to violate the 1 inch separation requirement in the SAR Body worn configuration testing. What is to keep this 22mm separation from the person's body? How is this accomplished? SAR testing for body worn configuration needs to be in accordance with actual distances expected shown in your manual. Please retest SAR to these distances or please explain how, in light of the drawing on page 92, your device can be expected to keep the 2.2cm distance specified in the Body worn configuration. xxx
3. On page 21 of the manual it states, "**Caution:** In order to comply with FCC RF exposure guidelines for mobile transmitting devices, a minimum distance of 20 cm must be maintained between the antenna and all persons." This is a cell/PCS phone, which is a portable device not a mobile device. It does not seem possible to use the phone in a normal condition and keep an 8 inch separation distance you have specified in your manual. Please refer to item 2 above. Please correct your manual to be consistent with antenna distances for portable devices, cell phone use and SAR. xxx
4. On page 26 of the manual you state to visit the Nokia website for "other" accessories. Please note that accessories which affect SAR need to be listed in the manual. Please list any such accessory provided by Nokia for this device in the manual and please provide SAR results showing compliance for any body worn application accessories. (see item 2 and 3) If no body worn accessories exist, please explain how the user is to keep the 2.2cm separation required in the manual. xxx
5. Please explain why SAR testing with the LPS-1 was not done. xxx
6. On page 142 under 'Pacemakers', you state 6 inches then in parenthesis you state 20cm. Please note that 20 cm is closer to 8 inches (7.8 inches). Please correct. xxx
7. In the SAR information in the beginning of the SAR report and in the manual you state that the measured SAR values for this device are 1.24w/kg and 0.75w/kg. Please note that according to the SAR summary table the highest SAR values are 1.24w/kg for head and 0.66w/kg for body. Please correct the manual and other documents to reflect the measured SAR values. xxx
8. FYI, the new rules for Part 22 and 24 are effective February 18, 2003.

Dennis Ward

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.