NOKIA

Nokia Mobile Phones (USA) Inc. 12278 Scripps Summit Drive San Diego, CA 92131 Tel (858) 831 5000

July 29, 2002

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

To:

Office of Engineering and Technology Laboratory

PER:

47 CFR 22.919

RE:

FCC ID: GMLNPD-1GW, Model 3580

The Electronic Serial Number (ESN) for each transceiver is unique.

The ESN host component is permanently attached to a main circuit board of the mobile transmitter and the integrity of the unit's operating software are not alterable. The ESN is isolated from fraudulent contact and tampering.

- ☐ The host component does not contain other information, it is not removable and its electrical connections are not accessible.
 - ☑ The host component does contain other information, and the ESN information is encoded using:
 - ☐ (1) Multiplication or division by a polynomial.
 - ☑ (2) Cyclic coding.
 - ☑ (3) The spreading of ESN bits over various non-sequential memory locations.

The ESN is factory set and is not alterable, transferable, removable, or otherwise able to be manipulated. Cellular mobile equipment is designed such that any attempt to remove, tamper with, or change the ESN chip, its logic system, or firmware originally programmed by the manufacturer will render the mobile transmitter inoperative.

Simon Lacey

Product Project Manager

Product Development, San Diego

NOKIA MOBILE PHONES