Federal Communications Commision
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Kwok Chan / Errol Chang:

Please find attached our reply to your correspondence concerning LJPNSB-6NY (EA96734, correspondence reference number 14308). The original text is followed by our highlighted response.

Regards,

Kare Oksanen
Engineering Manager, Type Approval
Nokia Mobile Phones, PCC Oulu

1. Please provide photos or other illustrations indicating the phone can only be placed in the proposed carrying holsters with its keypad/display facing the user when transmitting in body-worn configurations. Otherwise, additional SAR compliance results would be needed.

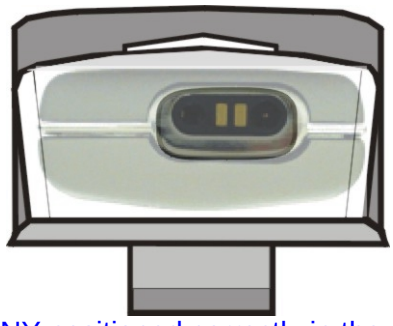
In case of positioning LJPNSB-6NY correctly in the carrying cases, the bottom connector is available for headset as shown in Picture 1.

Picture 1. LJPNSB-6NY positioned keypad/display facing the user

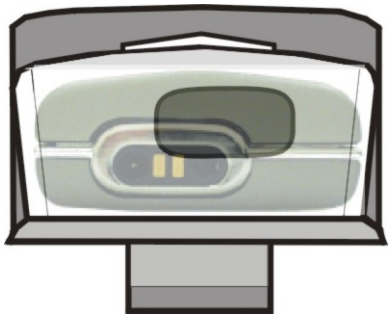
If LJPNSB-6NY is positioned in the way that its keypad and display are facing away from the user, the bottom connector will not be available without misusing the carrying cases (Picture 2). Thus having a call while having LJPNSB-6NY in the carrying case is reasonable only when keypad and display and facing the user.

Picture 2. LJPNSB-6NY positioned keypad/display facing away from the user

Even though the above pictures are taken of the horizontal carrying case, all the information applies also to the vertical one. Unfortunately we do not have the final vertical carrying case available yet, but hopefully the following figures clarify the positioning of the phone.



Picture 3. LJPNSB-6NY positioned correctly in the vertical carrying case



Picture 4. LJPNSB-6NY positioned falsely in the vertical carrying case

2. Please revise body-worn SAR compliance statement in the manual to exclude belt-clip. Only two carrying cases were tested for body-worn SAR compliance. Suggestion: ".....,, place the phone in specific Nokia carrying cases that have been tested for compliance. Use of non-Nokia-approved accessories may violate FCC RF exposure guidelines and should be avoided.".

We accept your suggestion. This paragraph will be changed as follows:

For body worn operation, to maintain compliance with FCC RF exposure guidelines, use only Nokia approved accessories. When carrying the phone while it is on, place the phone in the specific Nokia carrying cases that have been tested for compliance.

Use of non-Nokia-approved accessories may violate FCC RF exposure guidelines and should be avoided.

3. Please identify if the previously submitted body-worn SAR data for the two carrying cases and display against flat phantom are with antenna extended or retracted and submit SAR data for the other antenna position.

Previous carrying case SAR data was measured with antenna retracted. Actually we intended to measure SAR with antenna extended at the same time. The problem was that when the phone is placed in the carrying case which is then closed, extending the antenna is extremely difficult if not impossible. Even though the phone would be placed in the carrying case with antenna extended, the antenna would bend so badly that we could not consider this as a normal operating position. Thus we gave up the idea. I have included some photos, where the position of the antenna is marked with a red arrow.

Picture 5. LJPNSB-6NY placed in CSH-3 and the position of the antenna

Picture 6.LJPNSB-6NY placed in CSH-3 and the position of the antenna

Picture 7. LJPNSB-6NY placed in Carrying Case from CBP-2 and the position of the antenna

Picture 8. LJPNSB-6NY placed in Carrying Case from CBP-2 and the position of the antenna

4. FYI - Even at 6 GHz, muscle-equivalent dielectric constant… *(a very long explanation deleted to save some space*)… For the current filing, there is sufficient SAR margin in the measured results which we do not believe the difference in tissue dielectric parameters could result in non-compliance conditions; therefore, additional testing is not requested.

Please test SAR with appropriate tissue dielectric parameters as inappropriate tissue parameters may not be accepted for future filings.

Your concern is understandable. We will try to find a more suitable tissue simulating liquid for the future filings to the best of our abilities.

5. FYI - the response provided by the test lab had incorrectly substitute permittivity for tissue density in the SAR equation. Please note that any error or misunderstanding of this basic SAR equation could have significant effects on all SAR evaluations.

Thank you for pointing this out. We have discussed this with the test lab and they will no longer make modifications in regards to SAR evaluations without our approval.