



SAR EVALUATION REPORT

FCC 47 CFR § 2.1093
IEEE Std 1528-2013

For
Wireless Charging Station

FCC ID: 2AX2O-280010320
Model Name: 28-0010366

Report Number: 13486961-S1V3
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Revision History

Rev.	Date	Revisions	Revised By
V1	6/3/2021	Initial Issue	--
V2	6/8/2021	Front page and Section 1 – Corrected FCC ID. Section 7 – Clarified edge 3 test distance. Section 11 – Corrected Bluetooth power. Appendix A – Corrected Photograph 7 distance to 25 mm.	Dave Weaver
V3	6/28/2021	Section 13 – Corrected SAR value in summation	Dave Weaver

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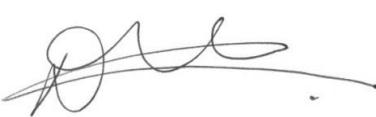
1. Attestation of Test Results

Applicant Name	28 Gorilla, LLC.	
FCC ID	2AX2O-280010320	
Model Name	28-0010366	
Applicable Standards	Published RF exposure KDB procedures IEEE Std 1528-2013	
	SAR Limits (W/Kg)	
Exposure Category	Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)
General population / Uncontrolled exposure	1.6	4
RF Exposure Conditions	<u>Equipment Class</u> - Highest Reported SAR (W/kg)	
	CW	DSS
Body	0.318	N/A
Simultaneous TX	0.326	
Date Tested	5/11/2021-5/12/2021	
Test Results	Pass	

UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of the U.S. government.

Approved & Released By: 	Prepared By: 
Dave Weaver Operations Leader UL Verification Services Inc.	Lance Fleischer Laboratory Engineer UL Verification Services Inc.

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure [KDB](#) procedures:

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure KDB procedures:

- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 680106 D01 RF Exposure Wireless Charging Apps v03
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

In addition to the above, the following information was used:

- [TCB workshop](#) October, 2016; Page 7, RF Exposure Procedures (Bluetooth Duty Factor)

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

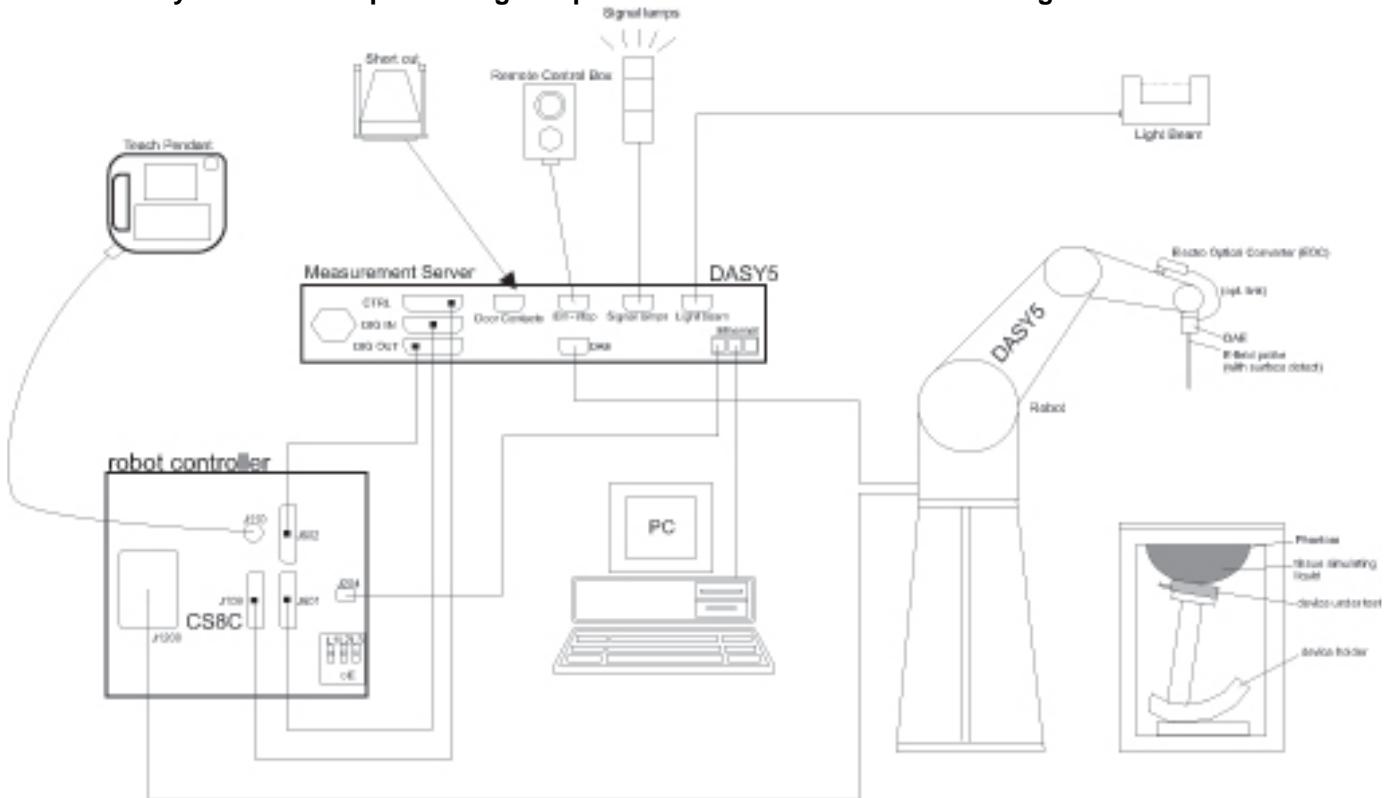
47173 Benicia Street	47266 Benicia Street
SAR Lab A	SAR Lab 1
SAR Lab B	SAR Lab 2
SAR Lab C	SAR Lab 3
SAR Lab D	SAR Lab 4
SAR Lab E	SAR Lab 5
SAR Lab F	SAR Lab 6
SAR Lab G	SAR Lab 7
SAR Lab H	SAR Lab 8

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

The DASY5 system used for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

		≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}		≤ 2 GHz: ≤ 8 mm $2 - 3$ GHz: ≤ 5 mm*	$3 - 4$ GHz: ≤ 5 mm* $4 - 6$ GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$ graded grid	≤ 5 mm	$3 - 4$ GHz: ≤ 4 mm $4 - 5$ GHz: ≤ 3 mm $5 - 6$ GHz: ≤ 2 mm
		$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$
Minimum zoom scan volume	x, y, z	≥ 30 mm	$3 - 4$ GHz: ≥ 28 mm $4 - 5$ GHz: ≥ 25 mm $5 - 6$ GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	Rohde & Schwarz	ZNLE6	1323.0012K56-101274-mn	2/26/2022
Dielectric Probe kit	SPEAG	DAK-3.5	1082	9/9/2021
Shorting block	SPEAG	DAK-3.5 Short	SM DAK 200 DA	9/9/2021
RF Cable	HUBER+SUHNER	SUCOFLEX 404	2077	N/A
Thermometer	Traceable Calibration Control Co.	4242	140562250	6/5/2021

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthesized Signal Generator	Rohde & Schwarz	SMB 100A	1406.6000K03-180970-Zc	2/16/2022
Power Meter	HP	437B	3125U11347	1/26/2022
Power Sensor	HP	8481A	1926A27048	1/28/2022
Power Sensor	Rohde & Schwarz	NRP18A	1424.6815K02-100995-hs	2/26/2022

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab F)	SPEAG	EX3DV4	7500	2/24/2022
Data Acquisition Electronics (SAR Lab F)	SPEAG	DAE4	1433	3/18/2022
System Validation Dipole	SPEAG	D900V2	1d143	10/21/2021

Other

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Keysight	N1911A	MY55196015	1/20/2022
Power Sensor	Agilent	N121A	MY53020038	1/28/2022

5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.

6. Device Under Test (DUT) Information

6.1. DUT Description

Device Dimension	See Appendix A	
Test sample information	S/N	Notes
	Gorilla007E	Radiated/Conducted Unit
	A330F	Receiver
	A292C	Receiver
	A1F3F	Receiver
	A3624	Receiver
Hardware Version	dig68x.gorilla.0	
Software Version	5.0.1.20	

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing
CW	917.5 MHz	Charging Client Device	100%
BLE	2.4 GHz	N/A	N/A ¹

Notes:

1. Measured Duty Cycle is not required due to SAR test exemption.

7. RF Exposure Conditions (Test Configurations)

The DUT is a desktop Wireless charging station and is not intended for handheld or body worn use.

The DUT is powered from an external 5V power supply and will only operate when connected to such.

As RF exposure values are too low to be measured at the standard distance of 15 cm indicated in KDB Publication 680106 D01 v03 for inductive WPT devices, and in accordance with FCC guidance on similar projects for 900 MHz WPT devices, SAR measurements were made at 25mm from the top surface and 0mm for edges with the exception of edge 3. Edge 3 was tested at 25mm due to the USB power cable preventing closer positioning to the phantom.

Wireless power transfer is only possible when at least one tag is placed upon the top surface of the DUT.

The client devices used to support testing were model number 28-0010038

Initial testing was performed with one, two, or four tags placed upon the surface of the DUT to determine worst case configuration.

Full testing (Top and four sides) was performed with the worst-case configuration.

8. Dielectric Property Measurements & System Check

8.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

The dielectric constant (ϵ_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within $\pm 5\%$ of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ϵ_r and σ may be relaxed to $\pm 10\%$. This is limited to frequencies $\leq 3\text{ GHz}$.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

SAR Lab	Date	Band (MHz)	Tissue Type	Frequency (MHz)	Relative Permittivity (ϵ_r)			Conductivity (σ)		
					Measured	Target	Delta	Measured	Target	Delta
F	5/11/2021	900	Head	900	39.67	41.50	-4.41	0.97	0.97	0.39
				880	39.93	41.50	-3.78	0.95	0.95	0.66
				920	39.42	41.49	-4.99	0.99	0.98	1.09

8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 \pm 0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be \geq 15.0 cm for SAR measurements \leq 3 GHz and \geq 10.0 cm for measurements $>$ 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

System Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within \pm 10% of the manufacturer calibrated dipole SAR target. Refer to Appendix B for the SAR System Check Plots.

SAR Lab	Date	Tissue Type	Dipole Type _Serial #	Dipole Cal. Due Data	Measured Results for 1g SAR				Measured Results for 10g SAR				Plot No.
					Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta \pm 10 %	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta \pm 10 %	
F	5/11/2021	Head	D900V2 SN:1d143	10/21/2021	1.100	11.00	10.59	3.87	0.702	7.02	6.93	1.30	1.2

9. Conducted Output Power Measurements

Mode	Freq. (MHz)	Average Power (dBm)	
		Meas Pwr	Tune-up
CW	917.5	29.0	29.0

10. Measured and Reported (Scaled) SAR Results

10.1. CW 917.5 MHz

RF Exposure Conditions	Mode	Power Back-off	Dist. (mm)	Test Position	Number of Tags	Freq. (MHz)	Power (dBm)		1-g SAR (W/kg)		Plot No.
							Tune-up Limit	Meas.	Meas.	Scaled	
Body	CW	N/A	25	Front	1	917.5	29.0	29.0	0.318	0.318	1
					2	917.5	29.0	29.0	0.201	0.201	
					4	917.5	29.0	29.0	0.170	0.170	
Body	CW	N/A	0	Edge 1	1	917.5	29.0	29.0	0.102	0.102	
			0	Edge 2	1	917.5	29.0	29.0	0.052	0.052	
			0	Edge 3	1	917.5	29.0	29.0	0.025	0.025	
			0	Edge 4	1	917.5	29.0	29.0	0.018	0.018	

Notes:

Initial testing was performed with one, two, or four tags placed upon the surface of the DUT to determine worst case configuration.

11. Standalone SAR Test Exclusion Considerations & Estimated SAR

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] [\sqrt{f(\text{GHz})}] \leq 3.0$, for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- $f_{(\text{GHz})}$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

When the standalone SAR test exclusion is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

- $(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) [\sqrt{f_{(\text{GHz})}/x}] \text{ W/kg}$ for test separation distances ≤ 50 mm;
where $x = 7.5$ for 1-g SAR, and $x = 18.75$ for 10-g SAR.
- 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

RF Air interface	RF Exposure Conditions	Frequency (GHz)	Max. tune-up tolerance Power		Min. test separation distance (mm)	SAR test exclusion Result*	Estimated 1-g SAR (W/kg)
			(dBm)	(mW)			
BLE	Body	2.402	-2.4	1	25	0.1	0.008

Conclusion:

*: The computed value is ≤ 3 ; therefore, BLE qualifies for Standalone SAR test exclusion.

12. SAR Measurement Variability

In accordance with published RF Exposure KDB 865664 D01 SAR measurement 100 MHz to 6 GHz. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

- 1) Repeated measurement is not required when the original highest measured SAR is <0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is \geq 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is $>$ 1.20 or when the original or repeated measurement is \geq 1.45 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first, or second repeated measurement is \geq 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is $>$ 1.20.

Note(s):

Repeated measurement is not required since the original highest measured SAR is <0.8 W/kg (1-g) or 2 W/kg (10-g) .

13. Simultaneous Transmission Conditions

According to KDB 447498 D01, General RF Exposure Guidance, simultaneous transmission SAR measurements can be excluded if the sum of the SAR from simultaneously transmitting antennas is less than the SAR limit.

The DUT supports simultaneous transmission between the 917.5 MHz and BLE transmitters.

The maximum reported SAR for 917.5 MHz is 0.318 W/kg

The estimated SAR value for BLE is 0.008 W/kg

The sum of the SAR is $0.318 + 0.008 = \mathbf{0.326 \text{ W/kg}}$.

The sum of the SAR is less than 1.6 W/kg therefore simultaneous transmission SAR measurements can be excluded.

Appendices

Refer to separated files for the following appendixes.

Appendix A: SAR Setup Photos

Appendix B: SAR System Check Plots

Appendix C: SAR Highest Test Plots

Appendix D: SAR Tissue Ingredients

Appendix E: SAR Probe Certificates

Appendix F: SAR Dipole Certificates

END OF REPORT