



PCTEST ENGINEERING LABORATORY, INC.

6660-B Dobbin Road, Columbia, MD 21045 USA
Tel. 410.290.6652 / Fax 410.290.6554
<http://www.pctestlab.com>



CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

Applicant Name:
NEC Corporation of America
Radio Communications Systems Division
6535 N. State Highway 161
Irving, TX 75039

Date of Testing:
August 29 - 30, 2006
Test Site/Location:
PCTEST Lab, Columbia, MD, USA
Test Report Serial No.:
0608280742-R1

FCC ID: A98-KMP7N2L1

APPLICANT: NEC CORPORATION OF AMERICA

Application Type: Certification
FCC Rule Part(s): § 2.1093; FCC/OET Bulletin 65 Supplement C (July 2001)
FCC Classification: PCS Licensed Transmitter Held to Ear (PCE)
EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth
Model(s): KMP7N2L1
Tx Frequency: 1850.20 - 1909.80 MHz (PCS GSM)
Rx Frequency: 1930.20 - 1989.80MHz (PCS GSM)
Conducted Power: 29.93 dBm Conducted (PCS GSM)
Max. SAR Measurement: 0.75 W/kg PCS GSM Head SAR; 1.01 W/kg PCS GPRS Body SAR
Test Device Serial No.: Pre-Production Sample [S/N: 00440120010757]

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-2005 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528-2003.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Grant Conditions: Power output listed is EIRP for Part 24. SAR compliance for body-worn operating configuration is based on a separation distance of 1.5 cm between the back of the unit and the body of the user. End-users must be informed of the body-worn operating requirements for satisfying RF exposure compliance. Belt clips or holsters may not contain metallic components.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.



Randy Ortanez
President



FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth	Page 1 of 23	

T A B L E O F C O N T E N T S

1.0	INTRODUCTION	3
1.1	SAR DEFINITION	3
2.0	TEST SITE LOCATION	4
2.1	INTRODUCTION	4
2.2	TEST FACILITY / ACCREDITATIONS	4
3.0	SAR MEASUREMENT SETUP	5
3.1	ROBOTIC SYSTEM	5
3.2	SYSTEM HARDWARE	5
3.3	SYSTEM ELECTRONICS	5
4.0	ALIDX-500 E-FIELD PROBE SYSTEM	6
4.1	PROBE MEASUREMENT SYSTEM	6
4.2	PROBE SPECIFICATIONS	6
5.0	PROBE CALIBRATION PROCESS	7
5.1	DOSIMETRIC ASSESSMENT PROCEDURE	7
5.2	FREE SPACE ASSESSMENT	7
5.3	TEMPERATURE ASSESSMENT	7
6.0	PHANTOM AND EQUIVALENT TISSUES	8
6.1	BRAIN & MUSCLE SIMULATING MIXTURE CHARACTERIZATION	8
7.0	TEST SYSTEM SPECIFICATIONS	9
7.1	AUTOMATED TEST SYSTEM SPECIFICATIONS	9
7.2	DATA ACQUISITION ELECTRONIC (DAE) SYSTEM	9
8.0	DOSIMETRIC ASSESSMENT AND PHANTOM SPECS	10
8.1	MEASUREMENT PROCEDURE	10
8.2	SPECIFIC ANTHROPOMORPHIC MANNEQUIN (SAM) SPECIFICATIONS	10
9.0	DEFINITION OF REFERENCE POINTS	11
9.1	EAR REFERENCE POINT (ERP)	11
9.2	HANDSET REFERENCE POINTS	11
10.0	TEST CONFIGURATION POSITION	12
10.1	BODY HOLSTER /BELT CLIP CONFIGURATIONS	12
11.0	ANSI/IEEE C95.1 - 2005 RF EXPOSURE LIMITS	13
11.1	UNCONTROLLED ENVIRONMENT	13
11.2	CONTROLLED ENVIRONMENT	13
12.0	MEASUREMENT UNCERTAINTIES	14
13.0	SAR TEST EQUIPMENT	15
13.1	EQUIPMENT CALIBRATION	15
14.0	CONCLUSION	16
14.1	MEASUREMENT CONCLUSION	16
15.0	REFERENCES	17
	EXHIBIT A. SYSTEM VERIFICATION	18
	EXHIBIT B. SAR SETUP PROCEDURES	19
	EXHIBIT C. SAR DATA SUMMARY	20
	EXHIBIT D. SAR DATA PLOTS	23

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 2 of 23

1.0 INTRODUCTION

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices.[1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-2005 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. (c) 2006 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave[3] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," NCRP Report No. 86 (c) NCRP, 1986, Bethesda, MD 20814.[6] SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

1.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 1-1).

$$SAR = \frac{d}{dt} \left(\frac{dU}{dm} \right) = \frac{d}{dt} \left(\frac{dU}{\rho dV} \right)$$

Figure 1-1
SAR Mathematical Equation



SAR is expressed in units of Watts per Kilogram (W/kg).

$$SAR = \sigma E^2 / \rho$$

where:

σ	=	conductivity of the tissue-simulant material (S/m)
ρ	=	mass density of the tissue-simulant material (kg/m ³)
E	=	Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 3 of 23

2.0 TEST SITE LOCATION

2.1 Introduction

The map to the right shows the location of PCTEST ENGINEERING LABORATORY in Columbia, Maryland. It is in proximity to the FCC Laboratory, the Baltimore-Washington International (BWI) airport, and the city of Baltimore and Washington, DC (See Figure 2-1).

These measurement tests were conducted at the PCTEST Engineering Laboratory, Inc. facility in New Concept Business Park, Guilford Industrial Park, Columbia, Maryland. The site address is 6660-B Dobbin Road, Columbia, MD 21045. The test site is one of the highest points in the Columbia area with an elevation of 390 feet above mean sea level. The site coordinates are 39° 11'15" N latitude and 76° 49' 38" W longitude. The facility is 1.5 miles north of the FCC laboratory and the ambient signal and ambient signal strength are approximately equal to those of the FCC laboratory. There are no FM or TV transmitters within 15 miles of the site. The detailed description of the measurement facility was found to be in compliance with the requirements of § 2.948 according to ANSI C63.4 on January 27, 2006 and Industry Canada.

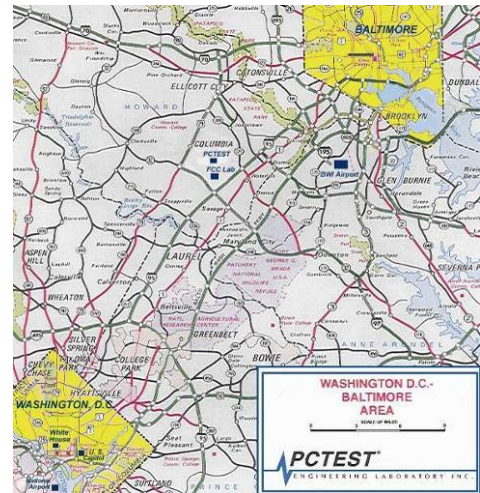




Figure 2-1
Map of the Greater Baltimore and
Metropolitan Washington, D.C. area

2.2 Test Facility / Accreditations

Measurements were performed at PCTEST Engineering Lab located in Columbia, MD 21045, U.S.A.



- PCTEST facility is an FCC registered (PCTEST Reg. No. 90864) test facility with the site description report on file and has met all the requirements specified in Section 2.948 of the FCC Rules and Industry Canada (IC-2451).
- PCTEST Lab is accredited to ISO 17025 by U.S. National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP Lab code: 100431-0) in EMC, FCC and Telecommunications.
- PCTEST Lab is accredited to ISO 17025-2005 by the American Association for Laboratory Accreditation (A2LA) in Specific Absorption Rate (SAR) testing, Hearing Aid Compatibility (HAC) testing, CTIA Test Plans, and wireless testing for FCC and Industry Canada Rules.
- PCTEST Lab is a recognized U.S. Conformity Assessment Body (CAB) in EMC and R&TTE (n.b. 0982) under the U.S.-EU Mutual Recognition Agreement (MRA).
- PCTEST TCB is a Telecommunication Certification Body (TCB) accredited to ISO/IEC Guide 65 by the American National Standards Institute (ANSI) in all scopes of FCC Rules and Industry Canada Standards (RSS).
- PCTEST facility is an IC registered (IC-2451) test laboratory with the site description on file at Industry Canada.
- PCTEST is a CTIA Authorized Test Laboratory (CATL) for AMPS, CDMA, and EvDO wireless devices and for Over-the-Air (OTA) Antenna Performance testing for AMPS, CDMA, GSM, GPRS, EGPRS, UMTS (W-CDMA), CDMA 1xEVDO, and CDMA 1xRTT.

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 4 of 23

3.0 SAR MEASUREMENT SETUP

3.1 Robotic System

Measurements are performed using the ALIDX-500 automated dosimetric assessment system. The ALIDX-500 is made by IDX Robotics, Inc. (IDX) in the United States and consists of high precision robotics system (CRS), robot controller, Pentium 4 computer, near-field probe, probe alignment sensor, and the Left and Right SAM phantoms containing the head/brain equivalent tissue, and the flat phantoms for body/muscle equivalent. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 3-1).

3.2 System Hardware

The Robot table consists of the power supply, robot controller, safety computer, teach pendant (Joystick), six-axis robot arm, and the probe. The cell controller consists of DELL Dimension 4300 Pentium-4 1.6 GHz computer with Windows 2000 system and SAR Measurement software, National Instruments analog card, monitor, keyboard, and mouse. The robot controller is connected to the cell controller to communicate between the two computers. The probe data is connected to the cell controller via data acquisition cables.

3.3 System Electronics

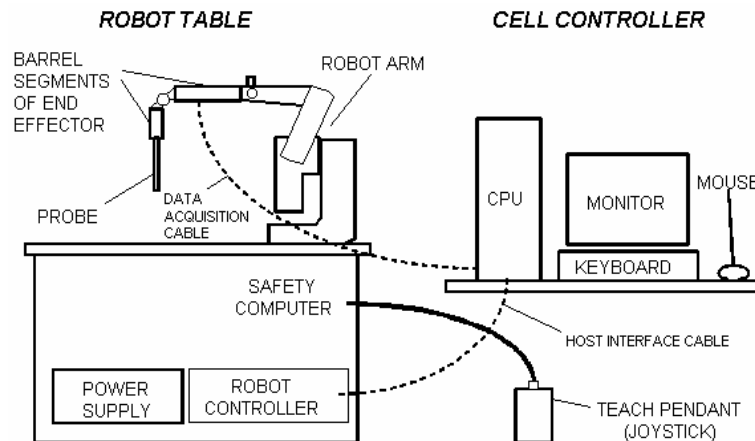




Figure 3-1
SAR Measurement System Setup

When the robot is in the home position, the Y-axis of the coordinate system parallels the line of intersection between the tabletop and the long axis of the Robot's Large Shoulder. The Teach Pendant may be used to establish the X,Y coordinate directions by depressing the 0-X and 0-Y MOTOR/AXIS switches while in axis mode.

The robot is first taught to position the probe sensor following a specific pattern of points. In the first sweep, the sensor enclosure touches the inside of the phantom head. The SAR is measured on a defined grid of points that are concentrated on the surface of the head closest to the antenna of the transmitting device (EUT).

FCC ID: A98-KMP7N2L1	 PCTEST SINCE 2006		 NEC	Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 5 of 23

4.0 ALIDX-500 E-FIELD PROBE SYSTEM

4.1 Probe Measurement System



Figure 4-1
IDX System

The near-field probe is an implantable isotropic E-field probe that measures the voltages proportional to the $|E|^2$ (electric) or $|H|^2$ (magnetic) fields. The probe is enclosed in a hollow glass protective cylinder with a 9-mm. outer diameter, 0.5 mm. thickness and 30 cm. length. The E-probe contains three electrically small array of orthogonal dipoles strategically placed to provide greater accuracy and to compensate for near-field spatial gradients. The probe contains diodes that are placed over the gap of the dipoles to improve RF detection. The electrical signal detected by each diode is amplified by three DC amplifiers, which are contained in a shielded container in the robot end effector, so its performance is not affected by the presence of incident electromagnetic fields (see Fig. 4-1).

4.2 Probe Specifications

Frequency Range:	10 kHz – 6.0 GHz
Calibration:	In air from 10 MHz to 6.0 GHz
	In brain and muscle simulating tissue at Frequencies from 835 up to 5800MHz
Sensitivity:	3.5 mV/mW/cm ² (air – typical)
DC Resistance:	300 k Ω
Isotropic Response:	0.25 dB
Dynamic Range:	10 mW/kg – 100 W/kg
Resistance to Pull:	25 N
Probe Length:	290 mm
Probe Tip Material:	Glass
Probe Tip Length:	40 mm
Application:	7 \pm 0.2 mm
	SAR Dosimetry Testing
	Compliance tests of mobile phones

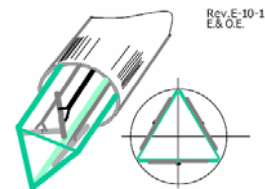


Figure 4-2
Triangular Probe Configuration

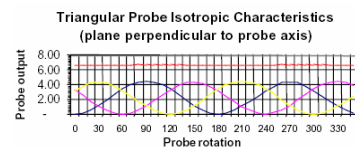




Figure 4-3

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 6 of 23

5.0 PROBE CALIBRATION PROCESS

5.1 Dosimetric Assessment Procedure

Each E-Probe/Probe amplifier combination has unique calibration parameters. A TEM calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm²) using an RF Signal generator, TEM cell, and RF Power Meter. The SAR measurement software is used for probe calibration.

5.2 Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, we place the probe in the volumetric center of the cavity and at the proper orientation with the field. We then rotate the probe 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm².

5.3 Temperature Assessment

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$SAR = C \frac{\Delta T}{\Delta t}$ <p>where: Δt = exposure time (30 seconds), C = heat capacity of tissue (brain or muscle), ΔT = temperature increase due to RF exposure.</p> <p>SAR is proportional to $\Delta T/\Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;</p>	$SAR = \frac{ E ^2 \cdot \sigma}{\rho}$ <p>where: σ = simulated tissue conductivity, ρ = Tissue density (1.25 g/cm³ for brain tissue)</p>
--	--

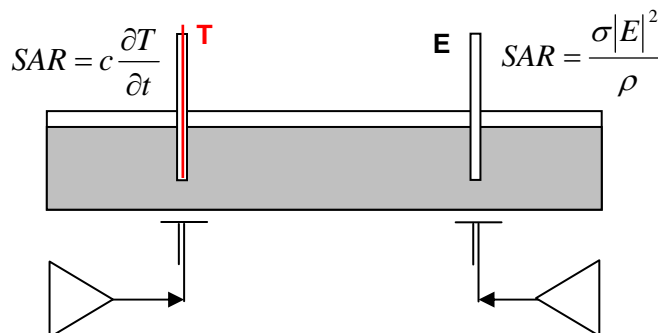




Figure 5-1 Temperature Assessment Test Configuration

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 7 of 23

6.0 PHANTOM AND EQUIVALENT TISSUES



Figure 6-1
SAM Phantoms

The Left and Right SAM Phantoms are constructed of a vivac composite integrated in a corian stand. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users [7][8]. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. 6-1)

6.1 Brain & Muscle Simulating Mixture Characterization

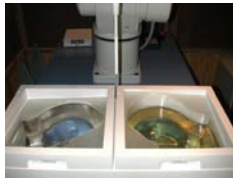


Figure 6-2
Head Simulated

The brain and muscle mixtures consist of a viscous gel using hydroxyethylcellulose (HEC) gelling agent and saline solution (see Table 6-1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity values of the desired tissue. The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 have been incorporated in the following table. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrrove [9].(see Table 6-1)

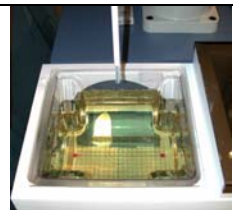


Figure 6-3
Body/Muscle Simulated Tissue

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7

Salt: 99% Pure Sodium Chloride

Water: De-ionized, 16 MΩ resistivity

DGBE: 99% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1,3,3-tetramethylbutyl)phenyl] ether

Sugar: 98% Pure Sucrose

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose

Bactericide: 0.1% Chlorhexidine

HEC: Hydroxyethyl Cellulose



Device Holder



Figure 6-4
Device Positioner

In combination with the SAM Phantom, the EUT Holder (see Fig. 6-4) enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. Device positioning is accurate and repeatable according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, and flat phantom).

* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce an infinite number of configurations [8]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

FCC ID: A98-KMP7N2L1	 SAR SUMMARY REPORT			Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth	Page 8 of 23	

7.0 TEST SYSTEM SPECIFICATIONS

7.1 Automated Test System Specifications

Positioner

Robot: CRS Robotics, Inc. Robot Model: F3
Repeatability: ± 0.05 mm (0.002 in.)
No. of axes: 6

7.2 Data Acquisition Electronic (DAE) System

Cell Controller

Processor: Pentium 4
Clock Speed: 1.6 GHz
Operating System: Windows 2000TM Professional
Data Card: NI DAQ Card (in CPU)

Data Converter

Software: IDX Flexware
Connecting Lines: Data Acquisition Cable
RS-232 Host Interface Cable
Sampling Rate: 6000 samples/sec

E-Field Probes



Model: E-020 S/N: PCT005
Construction: Triangular core absolute encoder system
Frequency: 10 MHz to 6.0 GHz

Phantom

Phantom: SAM Phantoms (Left & Right)
Shell Material: Vivac Composite
Thickness: 2.0 ± 0.2 mm



Figure 7-1
ALIDX-500 Test System

FCC ID: A98-KMP7N2L1	 SAR SUMMARY REPORT			Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 9 of 23

8.0 DOSIMETRIC ASSESSMENT AND PHANTOM SPECS

8.1 Measurement Procedure

The measurement procedure consists of the process parameters, probe parameters, EUT product data, and measurement scans (teach points). The measurement procedure is a set of predefined points to be scanned and measured by the probe, DC amplified and processed by the cell controller. The corresponding voltages determined by the electric and magnetic fields are extrapolated to determine peak SAR value.

The SAR Measurement System measures field strength by employing two different types of systematic measurement scans; a coarse scan and a fine scan. Coarse and fine scans measure field strength in a rectangular area within the XY plane (a plane parallel to the top of the Robot Table). The measurement area is divided into a grid of small squares defined by equally spaced grid lines. During an actual measurement process, the probe moves along grid lines, systematically recording the field strength at grid line intersections. Typically, after a coarse scan is completed, a fine scan is conducted at the peak field strength value (hot spot) that was measured in the coarse scan. The fine scan has a greater resolution (smaller grid squares) than the coarse scan and covers only a fraction of the measurement area in the coarse scan.



Deviation from measurement procedure – None

8.2 Specific Anthropomorphic Mannequin (SAM) Specifications

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the United States Army. The SAM Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. 8-1). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimize reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface. The SAM shell thickness is 2.0 ± 0.2 mm.



Figure 8-1
Left and Right SAM Phantom shells

FCC ID: A98-KMP7N2L1		 SAR SUMMARY REPORT		 Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 10 of 23

9.0 DEFINITION OF REFERENCE POINTS

9.1 Ear Reference Point (ERP)

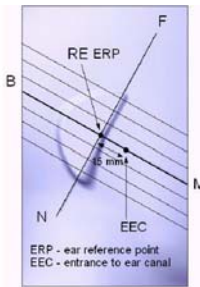


Figure 9-1 Close-up side view of ERPs

Figure 9-1 shows the front, back and side views of the SAM Twin Phantom. The point “M” is the reference point for the center of the mouth, “LE” is the left ear reference point (ERP), and “RE” is the right ERP. The ERPs are 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 9-2. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 9-2). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].



Figure 9-2 Front, back and side view of SAM Twin Phantom

9.2 Handset Reference Points

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the “test device reference point” located along the “vertical centerline” on the front of the device aligned to the “ear reference point” (See Fig. 9-3). The “test device reference point” was then located at the same level as the center of the ear reference point. The test device was positioned so that the “vertical centerline” was bisecting the front surface of the handset at its top and bottom edges, positioning the “ear reference point” on the outer surface of the both the left and right head phantoms on the ear reference point.

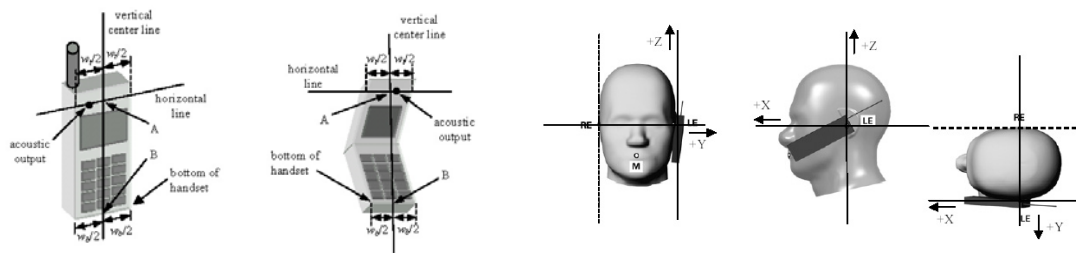




Figure 9-3 Handset Vertical Center & Horizontal Line Reference Points

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 11 of 23

10.0 TEST CONFIGURATION POSITION

10.1 Body Holster /Belt Clip Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 10-1). A device with a headset output is tested with a headset connected to the device. Body dielectric parameters are used.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are supplied with the device, the device is tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is implemented. All test position spacings are documented.

Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessory(ies), including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.



In all cases SAR measurements are performed to investigate the worst-case positioning. Worst-case positioning is then documented and used to perform Body SAR testing.

In order for users to be aware of the body-worn operating requirements for meeting RF exposure compliance, operating instructions and cautions statements must be included in the user's manual.



Figure 10-1 Body Belt Clip & Holster Configurations

**Example SAR Photo
(Not actual EUT)**

FCC ID: A98-KMP7N2L1		 SAR SUMMARY REPORT		 Reviewed by: Quality Manager	
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 12 of 23	

11.0 ANSI/IEEE C95.1 - 2005 RF EXPOSURE LIMITS

11.1 Uncontrolled Environment

Uncontrolled environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

11.2 Controlled Environment

Controlled environments defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.



	Human Exposure Limits	
	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Occupational Population (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.60	8.00
SPATIAL AVERAGE SAR Whole Body	0.08	0.40
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.00	20.00

Table 11-1. Safety Limits for Partial Body Exposure [2]

1 The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

2 The Spatial Average value of the SAR averaged over the whole body.



3 The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 13 of 23

12.0 MEASUREMENT UNCERTAINTIES

a	b	c	d	e= f(d,k)	f	g	h= cxf/e	i= cxg/e	k
Uncertainty Component	Sec.	Tol. (±%)	Prob. Dist.	Div.	c_i (1-g)	c_i (10-g)	1 - g u_i (± %)	10 - g u_i (± %)	v_i
Measurement System									
Probe Calibration	E1.1	11.4	N	$\sqrt{3}$	1	1	6.6	6.6	∞
Axial Isotropy	E1.2	3.4	R	$\sqrt{3}$	0.7	0.7	1.4	1.4	∞
Hemishperical Isotropy	E1.2	5.2	R	$\sqrt{3}$	1	1	3.0	3.0	∞
Boundary Effect	E1.3	4.7	R	$\sqrt{3}$	1	1	2.7	2.7	∞
Linearity	E1.4	5.9	R	$\sqrt{3}$	1	1	3.4	3.4	∞
System Detection Limits	E1.5	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	∞
Readout Electronics	E1.6	1.0	R	1	1	1	1.0	1.0	∞
Response Time	E1.7	0.8	R	$\sqrt{3}$	1	1	0.5	0.5	∞
Integration Time	E1.8	1.7	R	$\sqrt{3}$	1	1	1.0	1.0	∞
RF Ambient Conditions	E5.1	1.2	R	$\sqrt{3}$	1	1	0.7	0.7	∞
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	$\sqrt{3}$	1	1	0.2	0.2	∞
Probe Positioning w/ respect to Phantom Shell	E5.3	2.9	R	$\sqrt{3}$	1	1	1.7	1.7	∞
Extrapolation, Interpolation & Integration Algorithms for Max. SAR Evaluation	E4.2	3.9	R	$\sqrt{3}$	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E3.2.1	10.6	R	$\sqrt{3}$	1	1	6.1	6.1	11
Device Holder Uncertainty	E3.1.1	8.7	R	$\sqrt{3}$	1	1	5.0	5.0	8
Output Power Variation - SAR drift measurement	5.6.2	5.0	R	$\sqrt{3}$	1	1	2.9	2.9	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E2.1	4.0	R	$\sqrt{3}$	1	1	2.3	2.3	∞
Liquid Conductivity - deviation from target values	E2.2	5.0	R	$\sqrt{3}$	0.7	0.5	2.0	1.4	∞
Liquid Conductivity - measurement uncertainty	E2.2	5.0	R	$\sqrt{3}$	0.7	0.5	2.0	1.4	∞
Liquid Permittivity - deviation from target values	E2.2	5.0	R	$\sqrt{3}$	0.6	0.5	1.7	1.4	∞
Liquid Permittivity - measurement uncertainty	E2.2	5.0	R	$\sqrt{3}$	0.6	0.5	1.7	1.4	∞
Combined Standard Uncertainty (k=1)			RSS				13.2	13.0	
Expanded Uncertainty (k=2)							26.6	26.2	
(95% CONFIDENCE LEVEL)									
The above measurement uncertainties are according to IEEE Std. 1528 - 2003									

Table 12-1. Uncertainty Budget for SAR

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 14 of 23

13.0 SAR TEST EQUIPMENT



13.1 Equipment Calibration

EQUIPMENT SPECIFICATIONS			
Type		Calibration Date	Serial Number
CRS Robot F3		February 2006	RAF0134133
CRS C500C Motion Controller		February 2006	RCB0003303
CRS Teach Pendant (Joystick)		February 2006	STP0132231
DELL Computer, Pentium 4 1.6 GHz, Windows 2000TM		February 2006	4PJZ111
E-Field Probe E-020		January 2006	PCT005
Right Ear SAM Phantom (P-SAM-R)		February 2006	94X-113
Left Ear SAM Phantom (P-SAM-L)		February 2006	94X-019
Flat SAM Phantom (P-SAM-FLAT)		February 2006	94X-097
IDX Robot End Effector (EE-103-C)		February 2006	07111223
IDX Probe Amplifier		February 2006	07111113
Validation Dipole D-835S		March/ April 2006	PCT640
Validation Dipole D-1900S		March/ April 2006	PCT641
Brain Equivalent Matter (835MHz)		September 2006	PCTBEM101
Brain Equivalent Matter (1900MHz)		September 2006	PCTBEM301
Muscle Equivalent Matter (835MHz)		September 2006	PCTMEM201
Muscle Equivalent Matter (1900MHz)		September 2006	PCTMEM401
Amplifier Research 5S1G4 Power Amp		January 2006	PCT540
Agilent E8241A (250kHz ~ 20GHz) Signal Generator		November 2005	US42110432
HP-8753E (30kHz ~ 6GHz) Network Analyzer		January 2006	PCT552
HP85070B Dielectric Probe Kit		January 2006	PCT501
Ambient Noise/Reflection, etc.	(<12mW/kg/<3%of SAR)	January 2006	Anechoic Room PCT01

Table 13-1. Test Equipment Calibration

NOTE:

Dipole Validation measurement was performed by PCTEST Lab before each test. The brain simulating material is calibrated by PCTEST using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the brain-equivalent material.



FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 15 of 23

14.0 CONCLUSION

14.1 Measurement Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.[3]

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 16 of 23

15.0 REFERENCES

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.
- [2] ANSI/IEEE C95.1 - 2005, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 300kHz to 100GHz, New York: IEEE, Aug. 2005.
- [3] ANSI/IEEE C95.3 - 2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave, New York: IEEE, 2002.
- [4] Federal Communications Commission, OET Bulletin 65 (Edition 97-01), Supplement C (Edition 01-01), Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, July 2001.
- [5] IEEE Standards Coordinating Committee 34 – IEEE Std. 1528- 2003, Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices
- [6] NCRP, National Council on Radiation Protection and Measurements, Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields, NCRP Report No. 86, 1986. Reprinted Feb. 1995.
- [7] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, The Dependence of EM Energy Absorption upon Human Head Modeling at 900 MHz, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.
- [8] N. Kuster and Q. Balzano, Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.
- [9] G. Hartsgrrove, A. Kraszewski, A. Surowiec, Simulated Biological Materials for Electromagnetic Radiation Absorption Studies, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.
- [10] Q. Balzano, O. Garay, T. Manning Jr., Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.
- [11] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.
- [12] Federal Communications Commission, OET Bulletin 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. Supplement C, Dec. 1997.
- [13] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields High-frequency: 10kHz-300GHz, Jan. 1995.



FCC ID: A98-KMP7N2L1	 SAR SUMMARY REPORT			Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth	Page 17 of 23	

EXHIBIT A. SYSTEM VERIFICATION

Tissue Verification

Calibrated Date:	08/29/06		08/29/06	
	1900MHz Brain		1900MHz Muscle	
	Target	Measured	Target	Measured
Dielectric Constant	40.00	38.41	53.30	54.79
Conductivity	1.40	1.39	1.52	1.53

Table A-1 Simulated Tissue Verification

Test System Validation

Prior to assessment, the system is verified to $\pm 10\%$ of the specifications at 1900 MHz by using the system validation kits. (Graphic Plots Attached)

System Verification TARGET & MEASURED							
Date:	Amb. Temp (°C)	Liquid Temp(°C)	Input Power (W)	Tissue Frequency (Mhz)	Targeted SAR _{1g} (mW)	Measured SAR _{1g} (mW)	Deviation (%)
8/29/2006	22.8	21.9	0.040	1900	1.59	1.58	-0.50%

Table A-2 System Validation

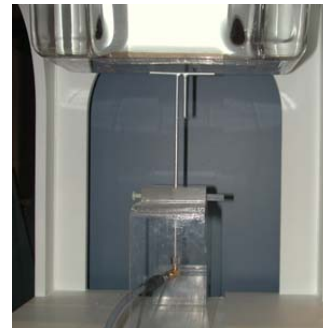


Figure A-1 Dipole Validation Test Setup



FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 18 of 23

EXHIBIT B. SAR SETUP PROCEDURES

Procedures Used To Establish Test Signal

The device was placed into continuous transmit mode using a call box. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [4].

Device Test Conditions

The device was powered through the battery. In order to verify that the device was tested at full power, conducted output power measurements were performed before and after each SAR measurement to confirm the output power. If a power deviation of more than 5% occurred, the test was repeated.





FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 19 of 23

EXHIBIT C. SAR DATA SUMMARY



MEASUREMENT RESULTS (GSM1900 Right Cheek)								
FREQUENCY		Mode	PCL	Conducted Power (dBm)	Test Position	Antenna Type	Battery	SAR (W/kg)
MHz	Ch.							
1850.20	512	GSM1900	0	29.60	Touch	Internal	Standard	0.58
1880.00	661	GSM1900	0	29.77	Touch	Internal	Standard	0.48
1909.80	810	GSM1900	0	29.93	Touch	Internal	Standard	0.40
MEASUREMENT RESULTS (GSM1900 Right Tilt)								
FREQUENCY		Mode	PCL	Conducted Power (dBm)	Test Position	Antenna Type	Battery	SAR (W/kg)
MHz	Ch.							
1850.20	512	GSM1900	0	29.60	Tilt	Internal	Standard	0.43
1880.00	661	GSM1900	0	29.77	Tilt	Internal	Standard	0.31
1909.80	810	GSM1900	0	29.93	Tilt	Internal	Standard	0.29
ANSI / IEEE C95.1 2005 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Brain 1.6 W/kg (mW/g) averaged over 1 gram			

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard and Extended batteries were investigated.
4. Power measured is conducted.
5. Tissue parameters and temperatures are listed on the SAR plots.
6. Liquid tissue depth is 15.1 cm. \pm 0.1

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 20 of 23


MEASUREMENT RESULTS (GSM1900 Left Cheek)								
FREQUENCY		Mode	PCL	Conducted Power (dBm)	Test Position	Antenna Type	Battery	SAR (W/kg)
MHz	Ch.							
1850.20	512	GSM1900	0	29.60	Touch	Internal	Standard	0.75
1880.00	661	GSM1900	0	29.77	Touch	Internal	Standard	0.72
1909.80	810	GSM1900	0	29.93	Touch	Internal	Standard	0.49
MEASUREMENT RESULTS (GSM1900 Left Tilt)								
FREQUENCY		Mode	PCL	Conducted Power (dBm)	Test Position	Antenna Type	Battery	SAR (W/kg)
MHz	Ch.							
1850.20	512	GSM1900	0	29.60	Tilt	Internal	Standard	0.32
1880.00	661	GSM1900	0	29.77	Tilt	Internal	Standard	0.28
1909.80	810	GSM1900	0	29.93	Tilt	Internal	Standard	0.19
ANSI / IEEE C95.1 2005 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Brain 1.6 W/kg (mW/g) averaged over 1 gram			

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard and Extended batteries were investigated.
4. Power measured is conducted.
5. Tissue parameters and temperatures are listed on the SAR plots.
6. Liquid tissue depth is 15.1 cm. \pm 0.1

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 21 of 23

MEASUREMENT RESULTS (GPRS Body)										
FREQUENCY		Mode	PCL	Conducted Power (dBm)	Test Position	Separation Distance (cm)	Antenna Type	Bluetooth	Battery	SAR (W/kg)
MHz	Ch.									
1850.20	512	GPRS	0	29.60	Body	1.50	Internal	OFF	Standard	1.01
1880.00	661	GPRS	0	29.77	Body	1.50	Internal	OFF	Standard	0.96
1909.80	810	GPRS	0	29.93	Body	1.50	Internal	OFF	Standard	0.91
1850.20	512	GPRS	0	29.60	Body	1.50	Internal	ON	Standard	0.97
ANSI / IEEE C95.1 2005 - SAFETY LIMIT					Body					
Spatial Peak Uncontrolled Exposure/General					1.6 W/kg (mW/g) averaged over 1 gram					

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard and Extended batteries were investigated.
4. Power measured is conducted.
5. Tissue parameters and temperatures are listed on the SAR plots.
6. Liquid tissue depth is 15.1 cm. \pm 0.1


 Randy Ortanez
 President





FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 22 of 23

EXHIBIT D. SAR DATA PLOTS

FCC ID: A98-KMP7N2L1		SAR SUMMARY REPORT		Reviewed by: Quality Manager
SAR Filename: 0608280742-R1	Test Dates: August 29 - 30, 2006	EUT Type: Single-Band PCS GSM/GPRS Phone with Bluetooth		Page 23 of 23

SAR Data Report 06082907

Start : 29-Aug-06 10:47:43 am
End : 29-Aug-06 10:53:56 am
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Single-Band PCS GSM Phone
Model Number : KMP7N2L1
Serial Number : 00440120010757
Frequency : 1850.2 MHz
Transmit Pwr : 0.912 W
Antenna Type : Helical
Antenna Posn. : Internal

Measurement Data:

Phantom Name : SAM-RIGHT
Phantom Type : Right Ear
Tissue Type : Brain
Tissue Dielectric : 38.410
Tissue Conductivity : 1.390
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Brain
Calibrated Dielectric : 39.020
Calibrated Conductivity : 1.370
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.400
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

PCS GSM Mode Ch. 512
Right Cheek
CF=8; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 0.038
Reading @ End = 0.040
Power at End = 104.3%

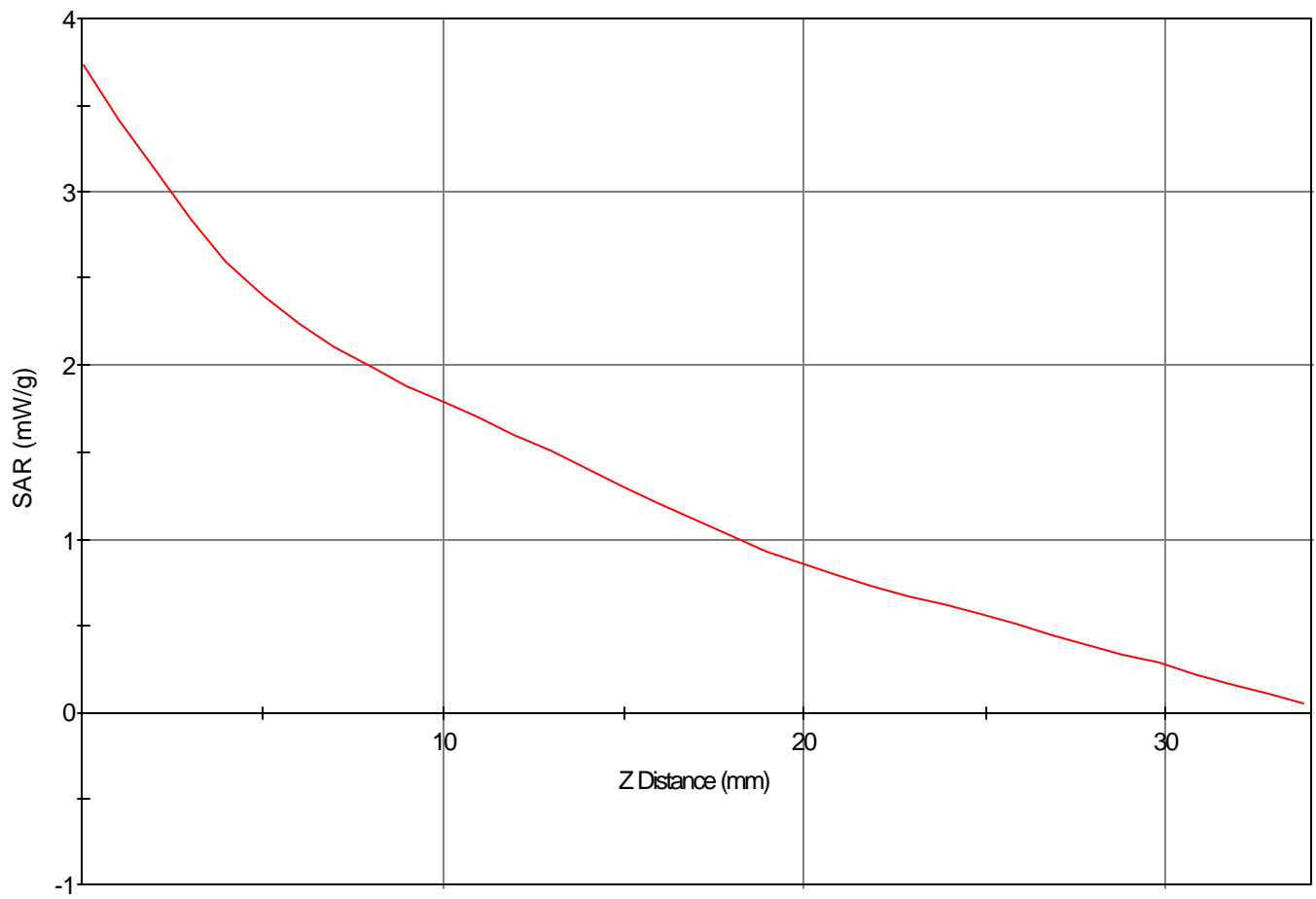
Area Scan - Max Peak SAR Value at x=24.0 y=0.0 = 0.40 W/kg

Zoom Scan - Max Peak SAR Value at x=26.0 y=-2.0 z=0.0 = 3.69 W/kg

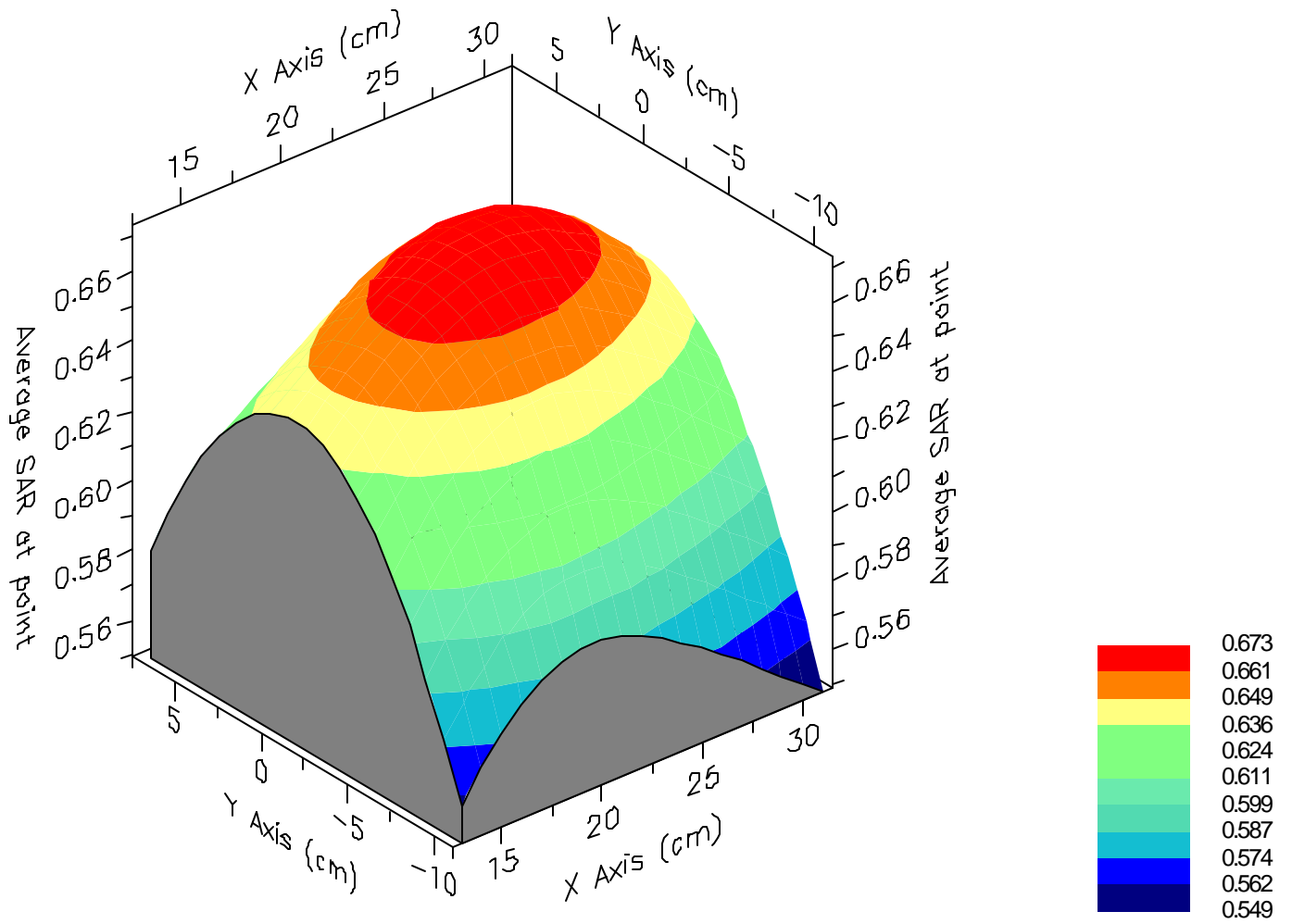
Max 1g SAR at x=27.0 y=-1.0 z=0.0 = 0.58 W/kg

Max 10g SAR at x=21.0 y=-3.0 z=0.0 = 0.23 W/kg

SAR - Z Axis
at Hotspot x:64.0 y:7.0



1g SAR Values





SAR Data Report 06083019

Start : 30-Aug-06 10:16:06 am
End : 30-Aug-06 10:21:26 am
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Single-Band PCS GSM Phone
Model Number : KMP7N2L1
Serial Number : 00440120010757
Frequency : 1850.2 MHz
Transmit Pwr : 0.912 W
Antenna Type : Helical
Antenna Posn. : Internal

Measurement Data:

Phantom Name : SAM-RIGHT
Phantom Type : Right Ear
Tissue Type : Brain
Tissue Dielectric : 38.410
Tissue Conductivity : 1.390
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Brain
Calibrated Dielectric : 39.020
Calibrated Conductivity : 1.370
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.400
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

PCS GSM Mode Ch. 512
Right Tilt
CF=8; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 0.707
Reading @ End = 0.716
Power at End = 101.2%

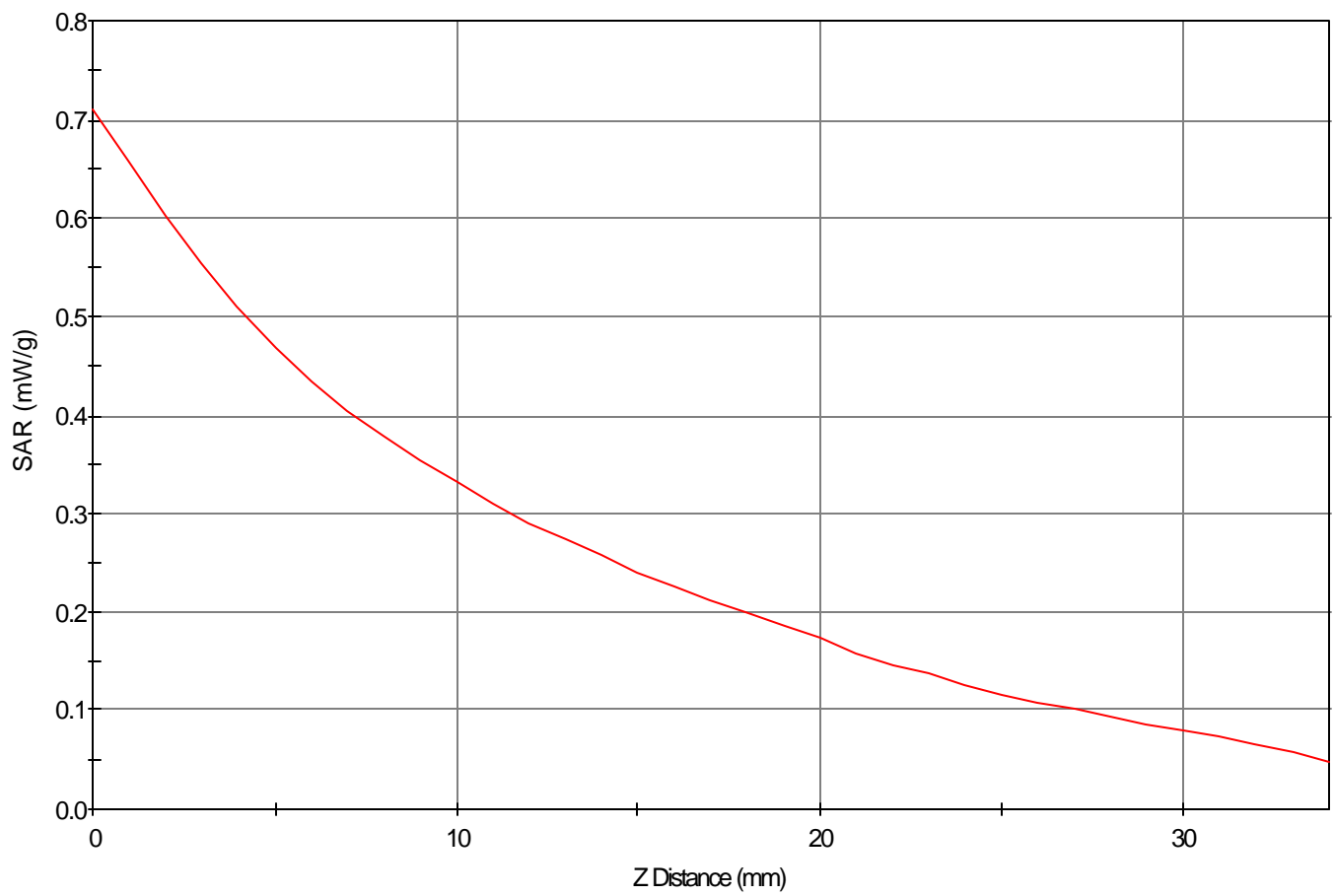
Area Scan - Max Peak SAR Value at x=21.0 y=-3.0 = 0.58 W/kg

Zoom Scan - Max Peak SAR Value at x=7.0 y=-2.0 z=0.0 = 0.71 W/kg

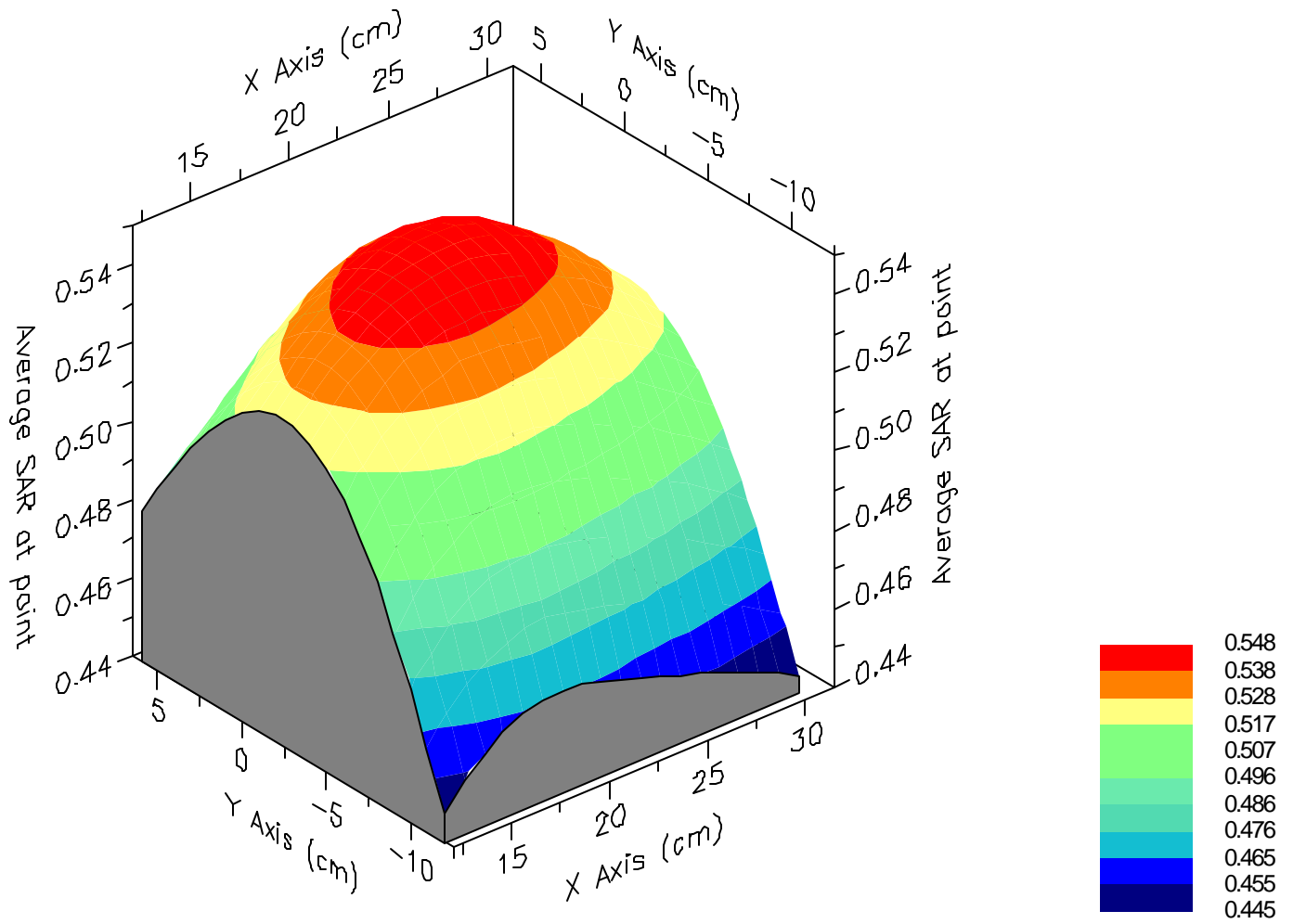
Max 1g SAR at x=21.0 y=-1.0 z=0.0 = 0.43 W/kg

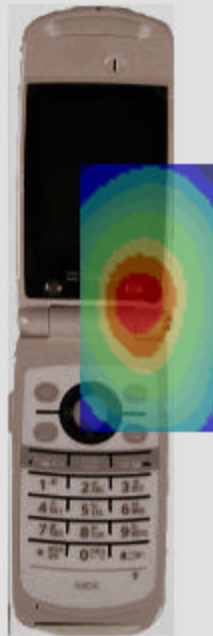
Max 10g SAR at x=24.0 y=-2.0 z=0.0 = 0.39 W/kg

SAR - Z Axis
at Hotspot x:7.0 y:-2.0



1g SAR Values





SAR Data Report 06082911

Start : 29-Aug-06 12:04:17 pm
End : 29-Aug-06 12:09:52 pm
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Single-Band PCS GSM Phone
Model Number : KMP7N2L1
Serial Number : 00440120010757
Frequency : 1850.2 MHz
Transmit Pwr : 0.912 W
Antenna Type : Helical
Antenna Posn. : Internal

Measurement Data:

Phantom Name : SAM-LEFT
Phantom Type : Left Ear
Tissue Type : Brain
Tissue Dielectric : 38.410
Tissue Conductivity : 1.390
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Brain
Calibrated Dielectric : 39.020
Calibrated Conductivity : 1.370
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.400
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

PCS GSM Mode Ch. 512
Left Cheek
CF=8; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 0.068
Reading @ End = 0.067
Power at End = 98.3%

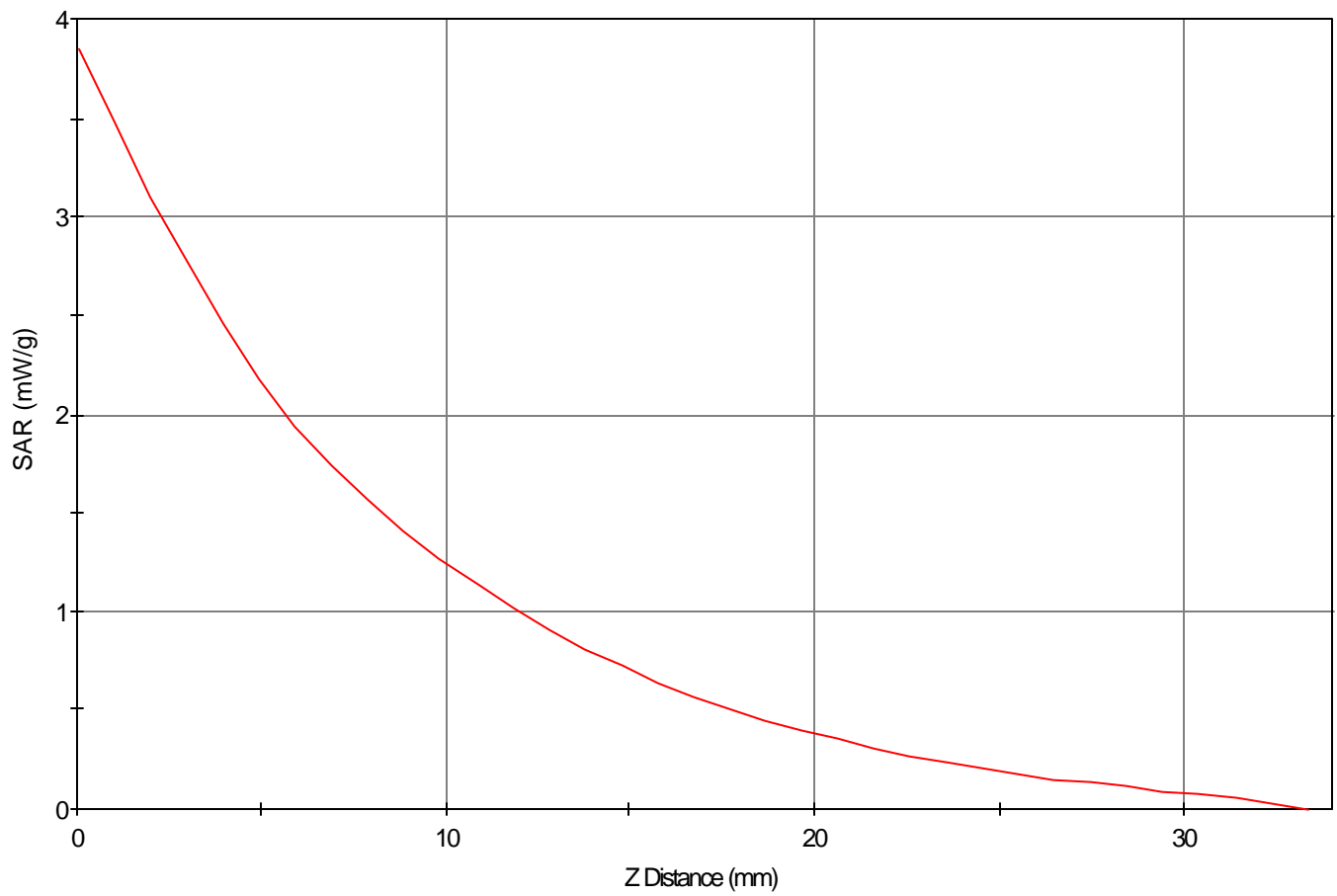
Area Scan - Max Peak SAR Value at x=50.0 y=8.0 = 0.50 W/kg

Zoom Scan - Max Peak SAR Value at x=54.0 y=4.0 z=0.0 = 3.79 W/kg

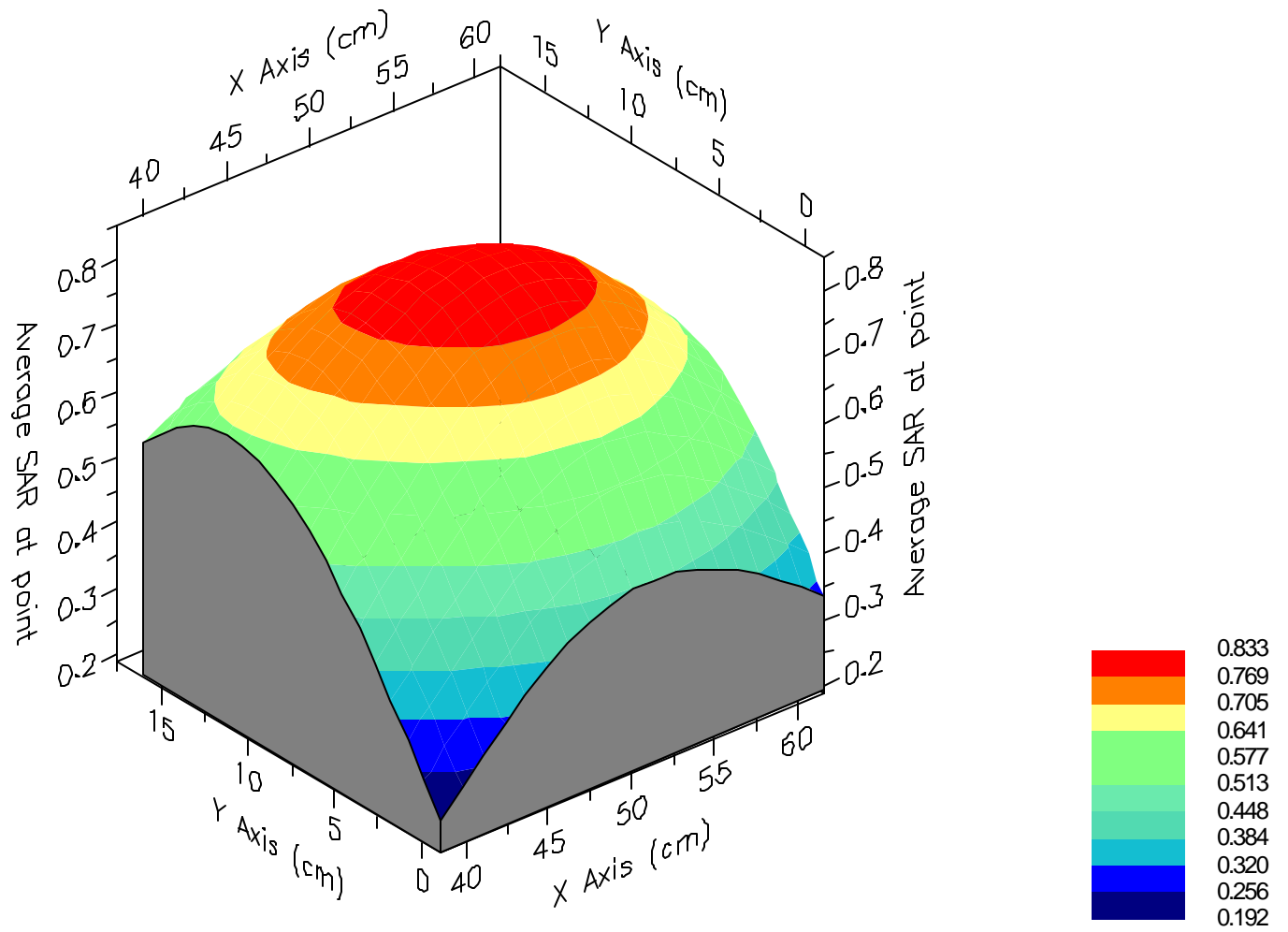
Max 1g SAR at x=59.0 y=5.0 z=0.0 = 0.75 W/kg

Max 10g SAR at x=53.0 y=5.0 z=0.0 = 0.30 W/kg

SAR - Z Axis
at Hotspot x:64.0 y:4.0



1g SAR Values





SAR Data Report 06083013

Start : 30-Aug-06 09:23:30 am
End : 30-Aug-06 09:29:47 am
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Single-Band PCS GSM Phone
Model Number : KMP7N2L1
Serial Number : 00440120010757
Frequency : 1850.2 MHz
Transmit Pwr : 0.912 W
Antenna Type : Helical
Antenna Posn. : Internal

Measurement Data:

Phantom Name : SAM-LEFT
Phantom Type : Left Ear
Tissue Type : Brain
Tissue Dielectric : 38.410
Tissue Conductivity : 1.390
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Brain
Calibrated Dielectric : 39.020
Calibrated Conductivity : 1.370
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.400
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

PCS GSM Mode Ch. 512
Left Tilt
CF=8; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 0.024
Reading @ End = 0.023
Power at End = 96.6%

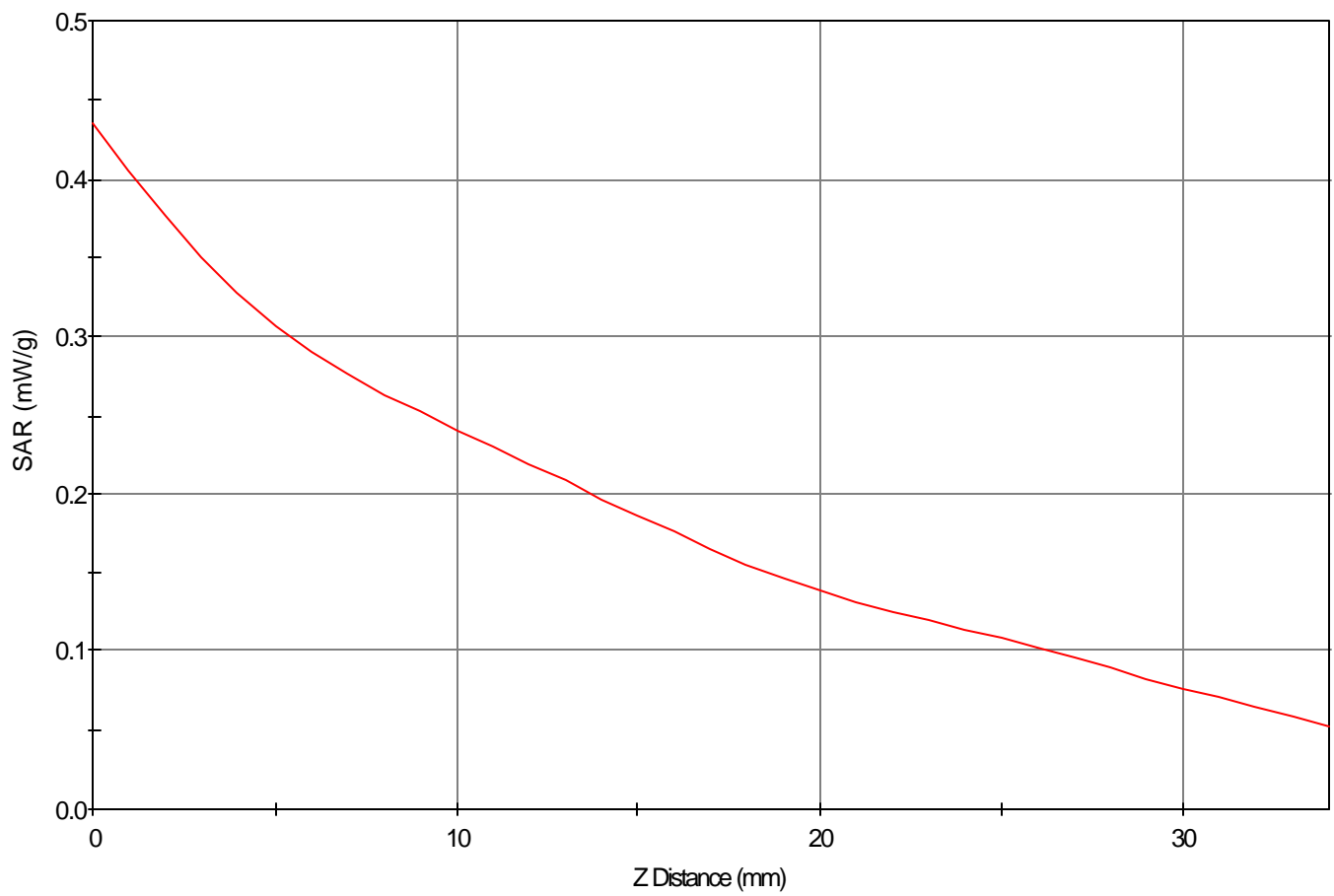
Area Scan - Max Peak SAR Value at x=47.0 y=4.0 = 0.33 W/kg

Zoom Scan - Max Peak SAR Value at x=49.0 y=4.0 z=0.0 = 0.43 W/kg

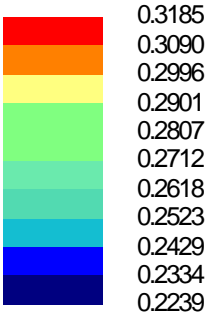
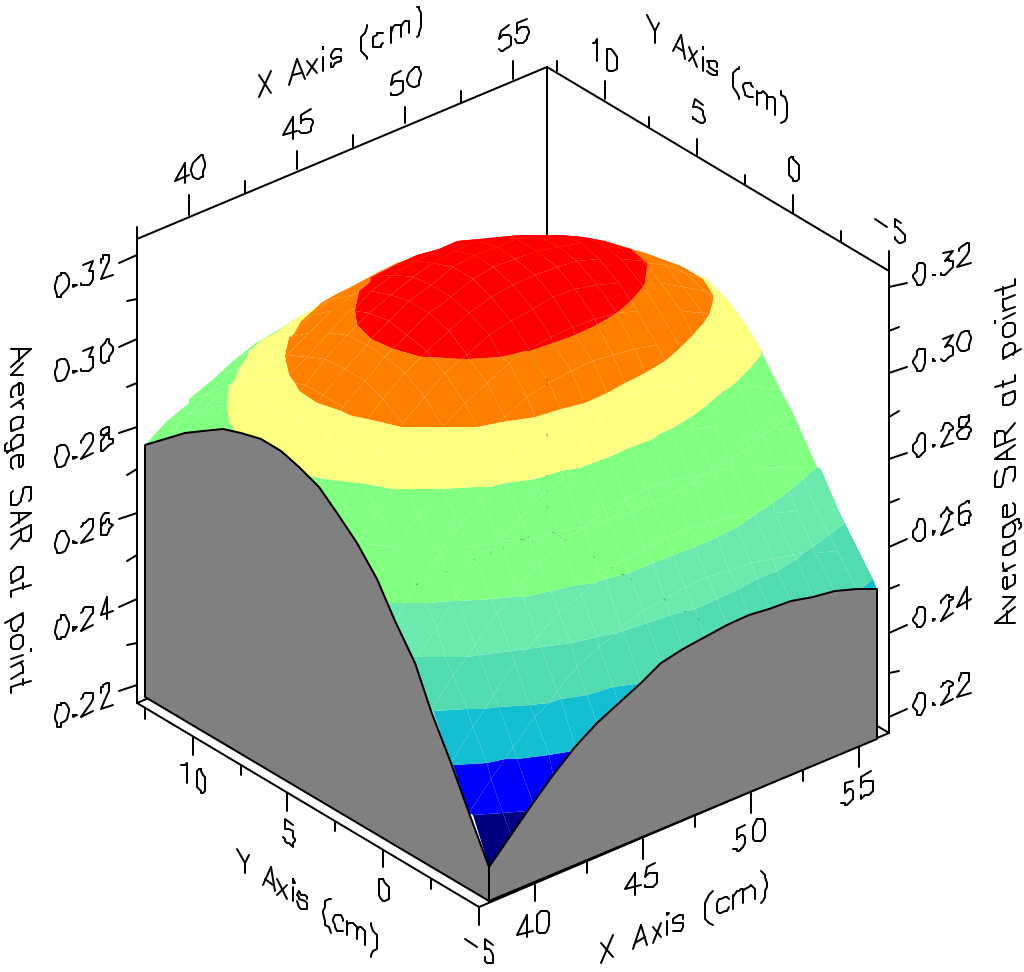
Max 1g SAR at x=48.0 y=5.0 z=0.0 = 0.32 W/kg

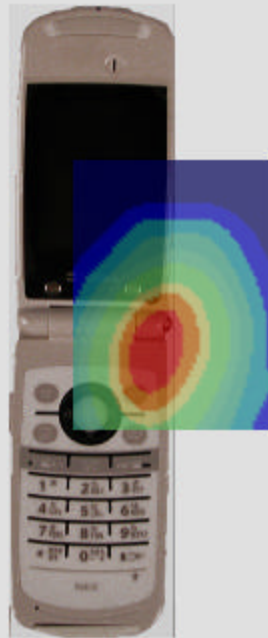
Max 10g SAR at x=47.0 y=6.0 z=0.0 = 0.22 W/kg

SAR - Z Axis
at Hotspot x:49.0 y:4.0



1g SAR Values





SAR Data Report 06082918

Start : 29-Aug-06 12:02:14 pm
End : 29-Aug-06 12:07:15 pm
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Single-Band PCS GSM Phone
Model Number : KMP7N2L1
Serial Number : 00440120010757
Frequency : 1850.2 MHz
Transmit Pwr : 0.912 W
Antenna Type : Helical
Antenna Posn. : Internal

Measurement Data:

Phantom Name : SAM FLAT
Phantom Type : Uniphantom
Tissue Type : Muscle
Tissue Dielectric : 54.790
Tissue Conductivity : 1.530
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Muscle
Calibrated Dielectric : 51.810
Calibrated Conductivity : 1.580
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.500
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

PCS GPRS Mode Ch. 512
Body (w/ 1.5cm spacing and Bluetooth On)
CF=4; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 1.575
Reading @ End = 1.563
Power at End = 99.2%

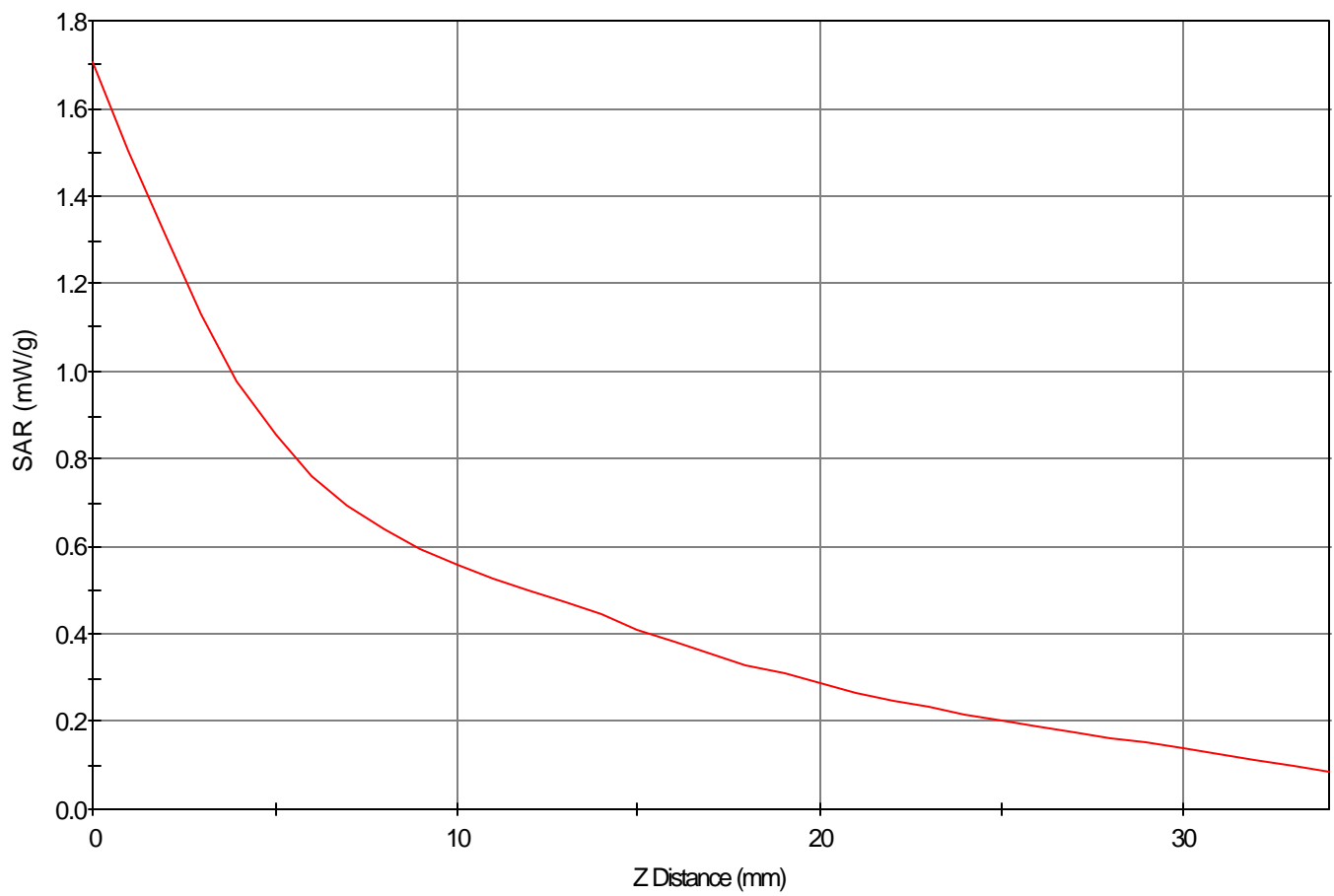
Area Scan - Max Peak SAR Value at x=0.0 y=-1.0 = 1.01 W/kg

Zoom Scan - Max Peak SAR Value at x=0.0 y=-5.0 z=0.0 = 1.71 W/kg

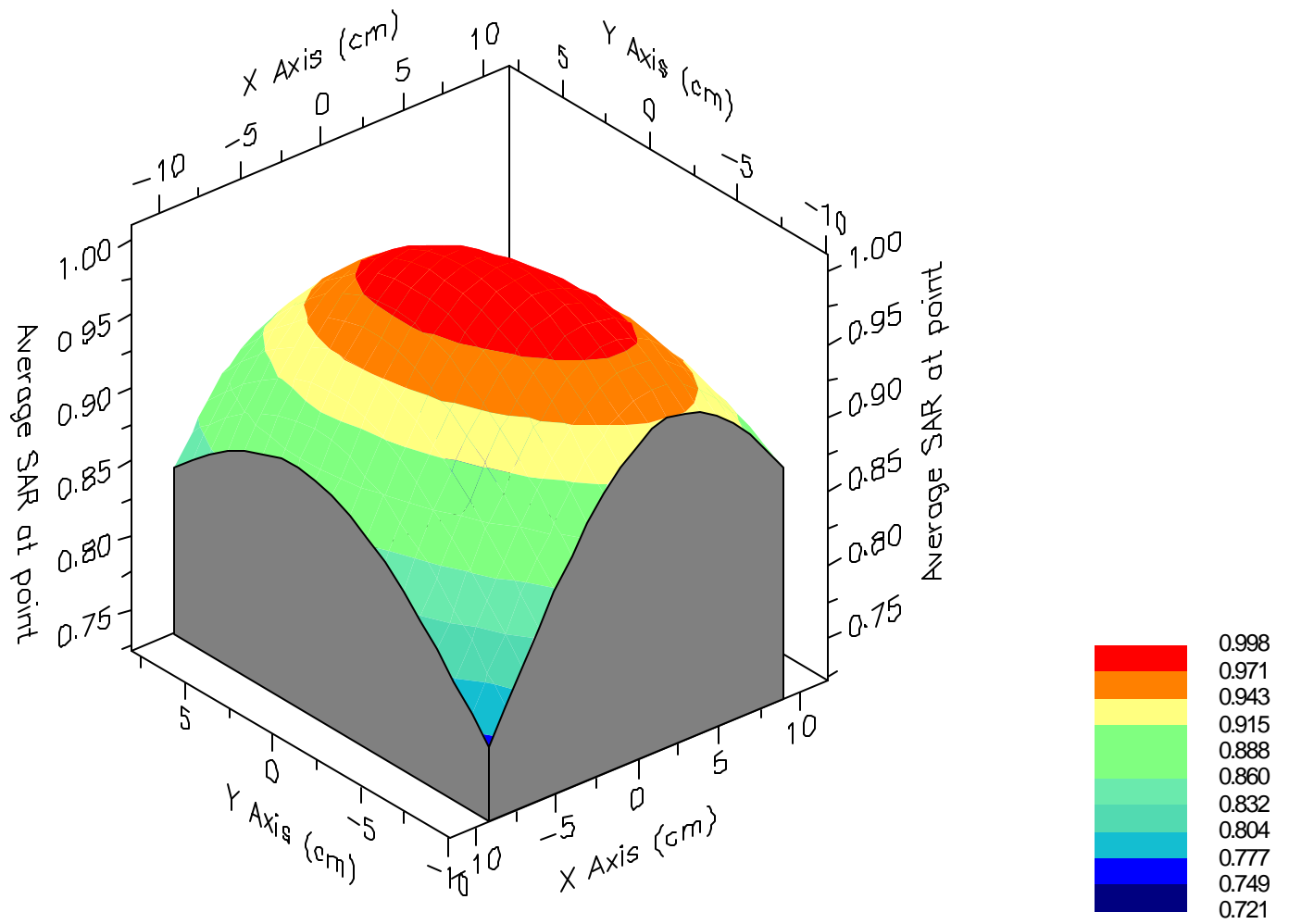
Max 1g SAR at x=0.0 y=-2.0 z=0.0 = 1.01 W/kg

Max 10g SAR at x=0.0 y=-3.0 z=0.0 = 0.62 W/kg

SAR - Z Axis
at Hotspot x:0.0 y:-5.0



1g SAR Values





APPENDIX B: DIPOLE VALIDATION

SAR Data Report 06090102

Start : 1-Sep-06 09:03:18 am
End : 1-Sep-06 09:08:55 am
Code Version : 4.08
Robot Version: 4.08

Product Data:

Type : Verification
Model Number : E-020
Serial Number : PCT005
Frequency : 1900 MHz
Transmit Pwr : 0.040 W
Antenna Type : Dipole
Antenna Posn. : Verification

Measurement Data:

Phantom Name : FLATPHANTOM
Phantom Type : Uniphantom
Tissue Type : Brain
Tissue Dielectric : 38.410
Tissue Conductivity : 1.390
Tissue Density : 1.000
Robot Name : CRS

Probe Data:

Probe Name : PCT005
Probe Type : E Fld Triangle
Frequency : 1900 MHz
Tissue Type : Brain
Calibrated Dielectric : 39.020
Calibrated Conductivity : 1.370
Calibrated Density : 1.000
Probe Offset : 1.600 mm
Conversion Factor : 5.400
Probe Sensitivity : 5.115 4.969 4.453 mV/(mW/cm^2)
Amplifier Gains : 20.00 20.00 20.00

Sample:

Rate: 6000 Samples/Sec
Count: 1000 Samples
NIDAQ Gain: 5

Comments:

1900MHz Dipole Validation

CF=1; Amb. Temp= 22.8 'C; Liq. Temp=21.9 'C

Power Drop Test:

Reading @ start = 1.582
Reading @ End = 1.605
Power at End = 101.5%

Area Scan - Max Peak SAR Value at x=1.0 y=0.0 = 1.62 W/kg

Zoom Scan - Max Peak SAR Value at x=1.0 y=2.0 z=0.0 = 3.12 W/kg

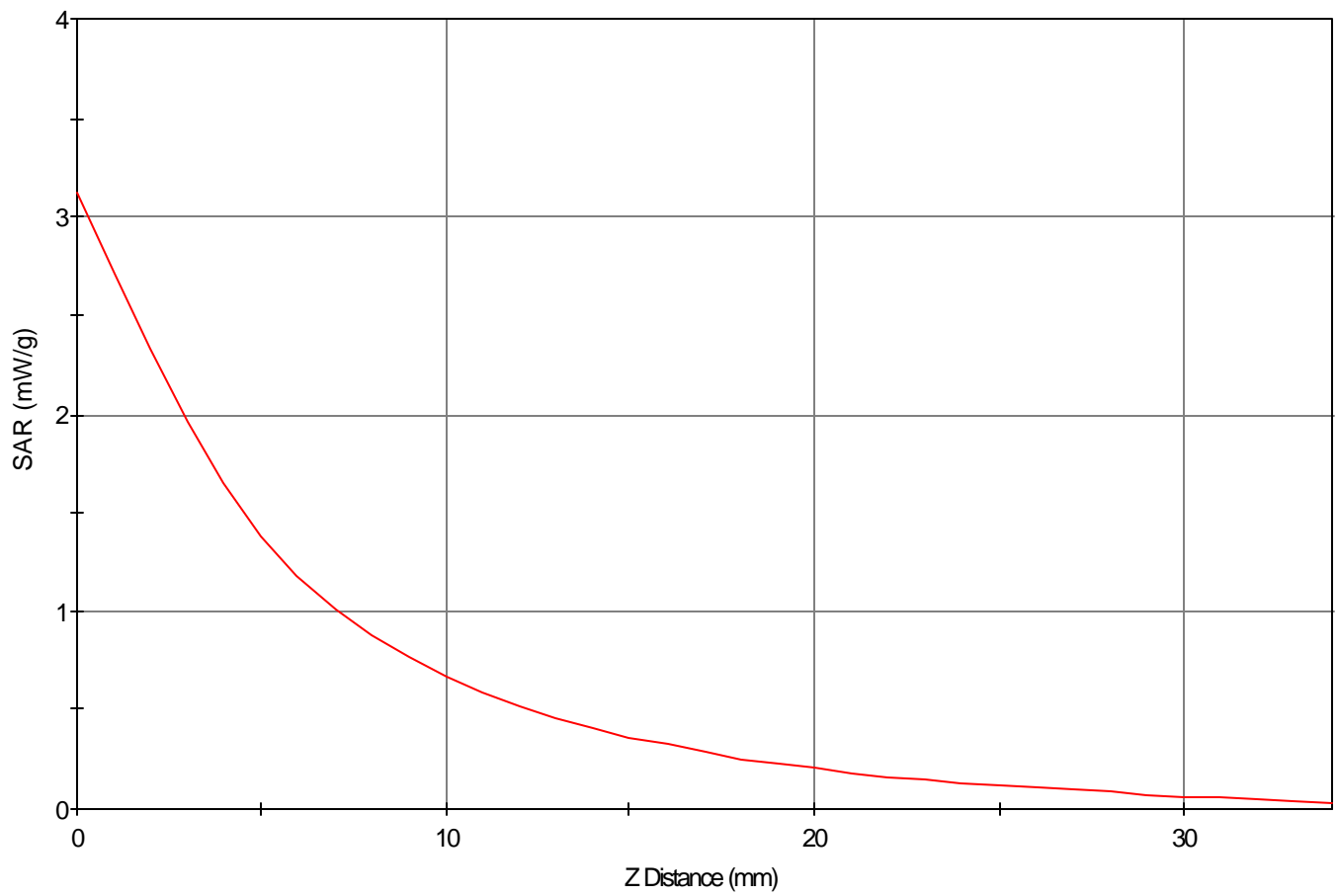
Max 1g SAR at x=2.0 y=2.0 z=0.0 = 1.58 W/kg

Max 10g SAR at x=2.0 y=2.0 z=0.0 = 0.77 W/kg

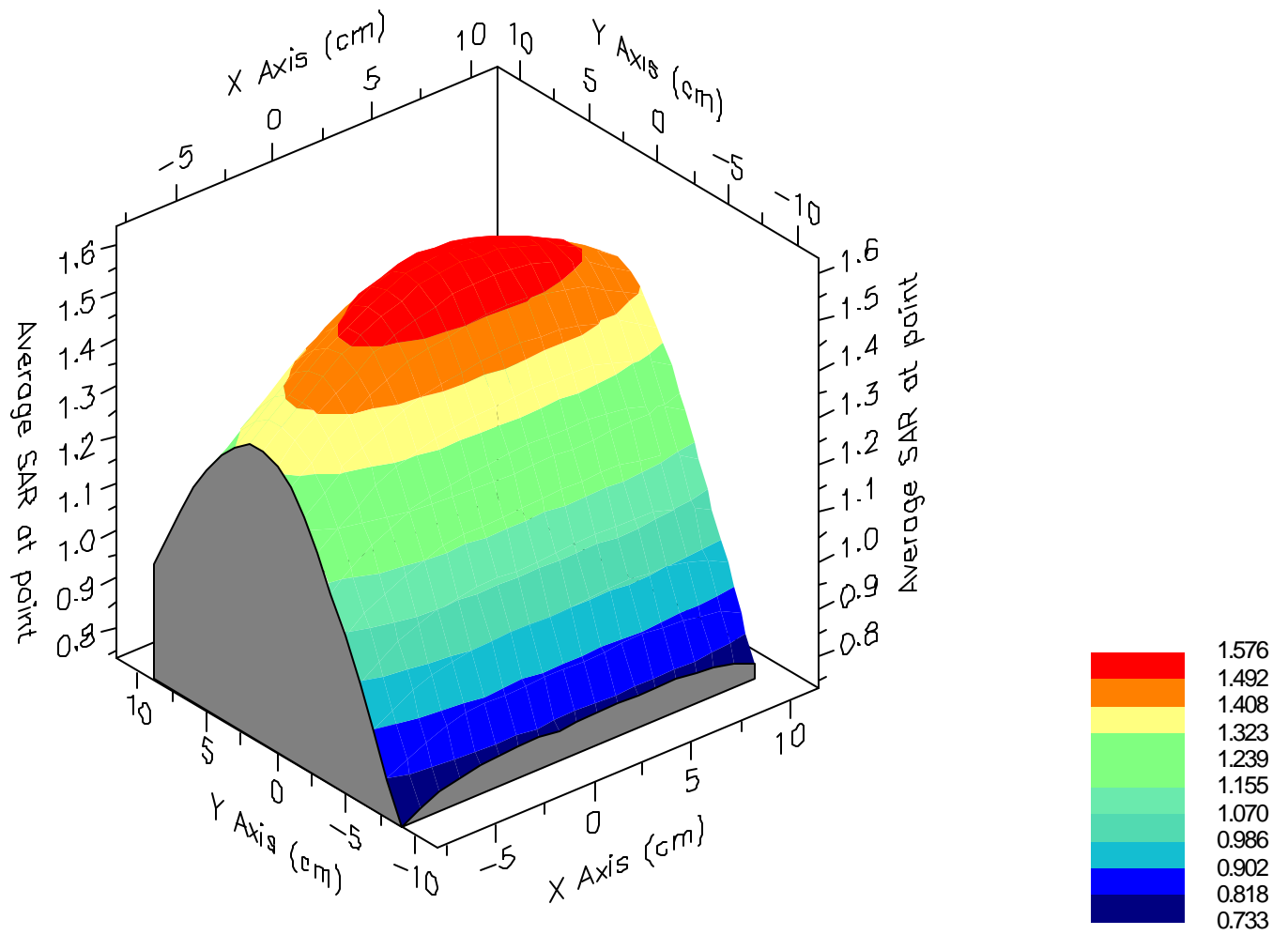
Validation Results at 0.04 W:

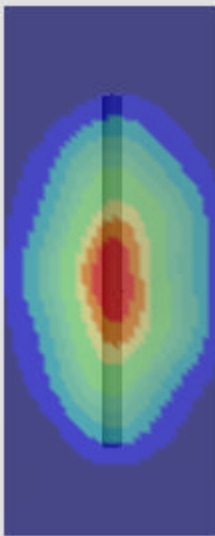
Peak Nominal = 2.9, Error: 8.31 %
1g Nominal = 1.6, Error: -0.73 %
10g Nominal = 0.8, Error: -4.39 %

SAR - Z Axis
at Hotspot x:1.0 y:2.0



1g SAR Values





APPENDIX C: PROBE CALIBRATION

Probe E-020

SN: PCT005

Manufactured:

November 10, 2004

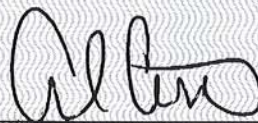
Calibrated:

January 5, 2006

Calibrated for the IDX System

PCTEST Calibration Laboratory

Approved By:



Alfred Cirwithian
Vice President Engineering

Calibration is performed according to IEEE Std. 1528 - 2003
and all test equipment used is traceable to U.S. NIST.



PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA

Calibration Summary

Model: E-020

S/N: PCT005

Tissue Type	Frequency (MHz)	Dielectric Constant ϵ_r	Conductivity (S/m) σ	Conversion Factor $\gamma_x, \gamma_y, \gamma_z$
Brain	450	44.41	0.88	8.8
Brain	835	40.81	0.87	5.5
Brain	1900	39.02	1.37	5.4
Brain	2450	40.11	1.39	5.25
Muscle	450	57.70	0.96	9.24
Muscle	835	53.66	0.98	5.85
Muscle	1900	51.81	1.58	5.5
Muscle	2450	52.23	1.53	5.3

Frequency (MHz)	Isotropy	
	%	dB
450	1.23	0.05
835	2.12	0.09
1900	6.61	0.28
2450	7.61	0.32

Boundary Effect < 2%, 2.5 mm from probe tip to phantom

Diode Compression Point: 120 mV

Environmental Conditions:

Temperature: 22.6 °C

Relative Humidity: 41%

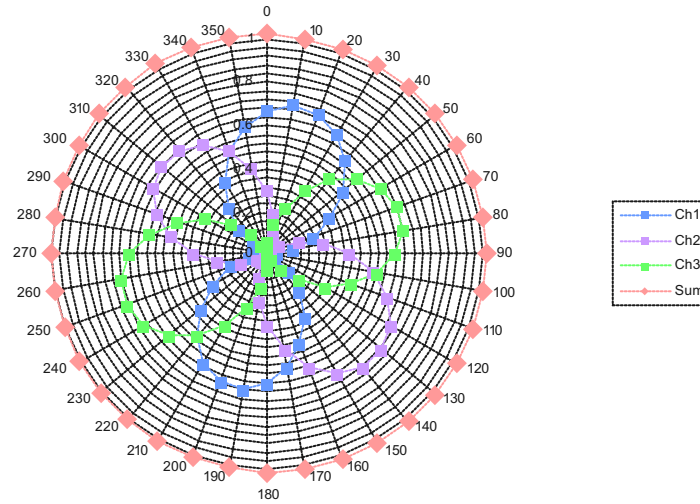
Barometer: 101.2 kPa

This probe was calibrated under the IEEE Std 1309-1966, *IEEE Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas*, from 9 kHz to 40 GHz.

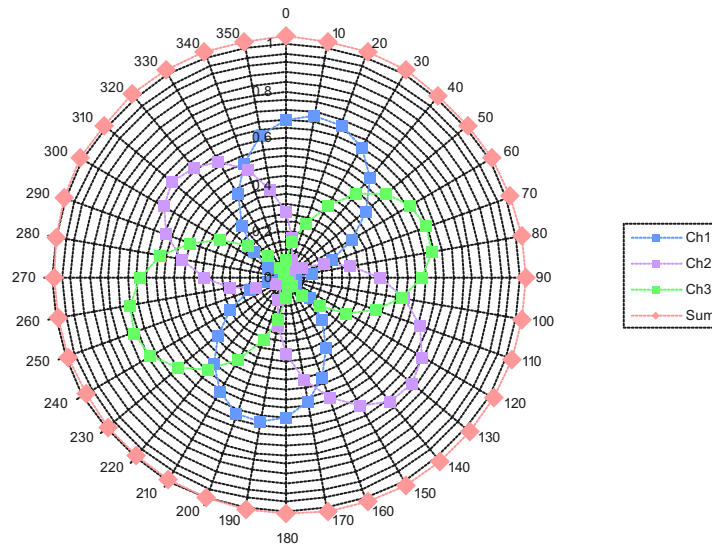
PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA

450 MHz Calibration (PCT005)



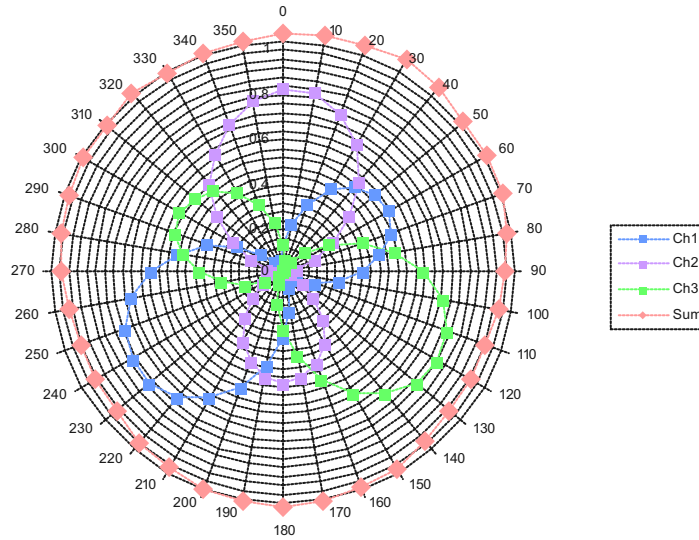
835 MHz Calibration (PCT005)



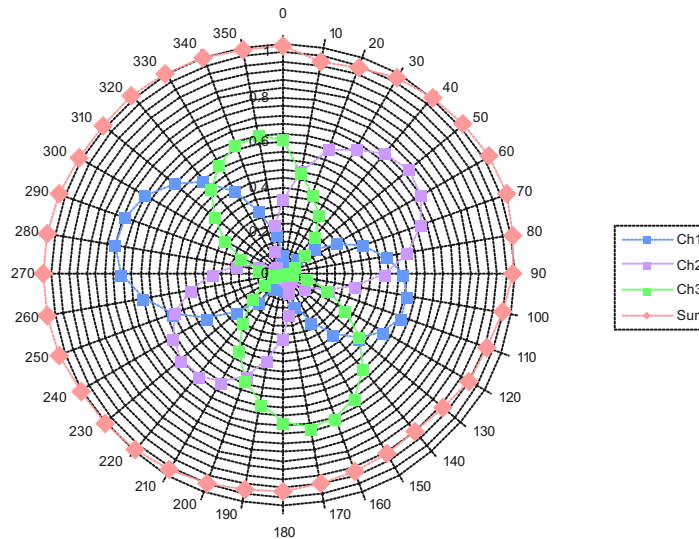
PCTEST Calibration Laboratory

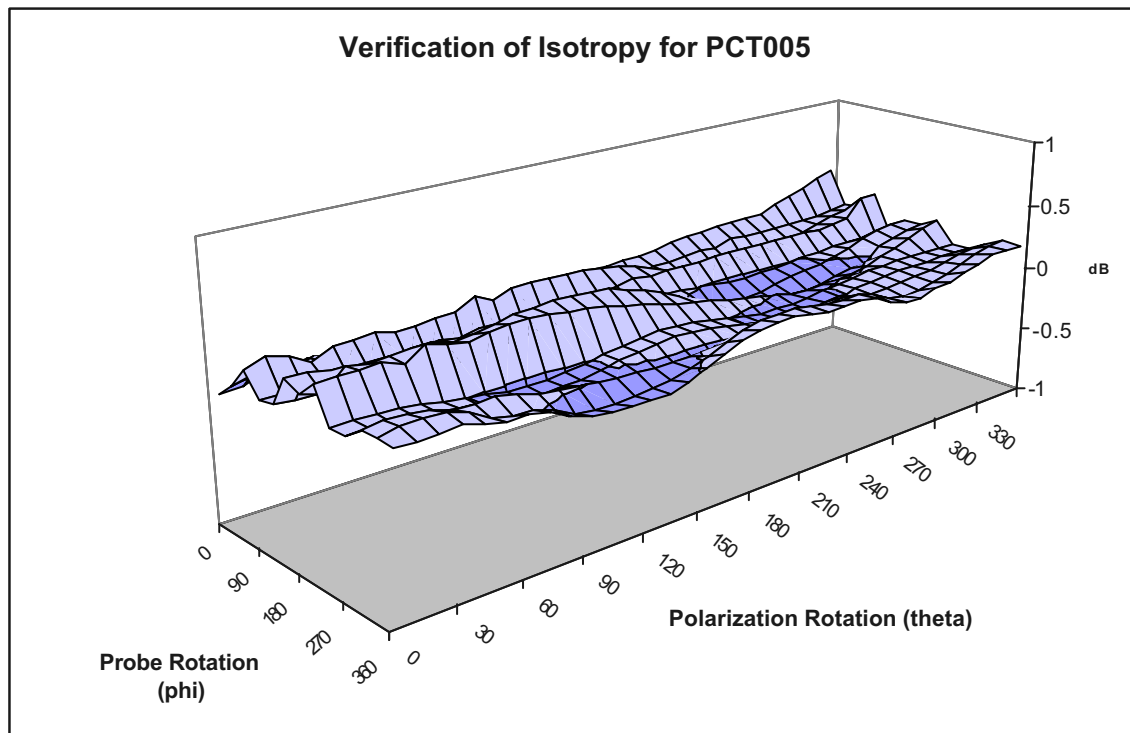
6660-B Dobbin Road
Columbia, Maryland 21045 USA

1900 MHz Calibration (PCT005)



2450 MHz Calibration (PCT005)





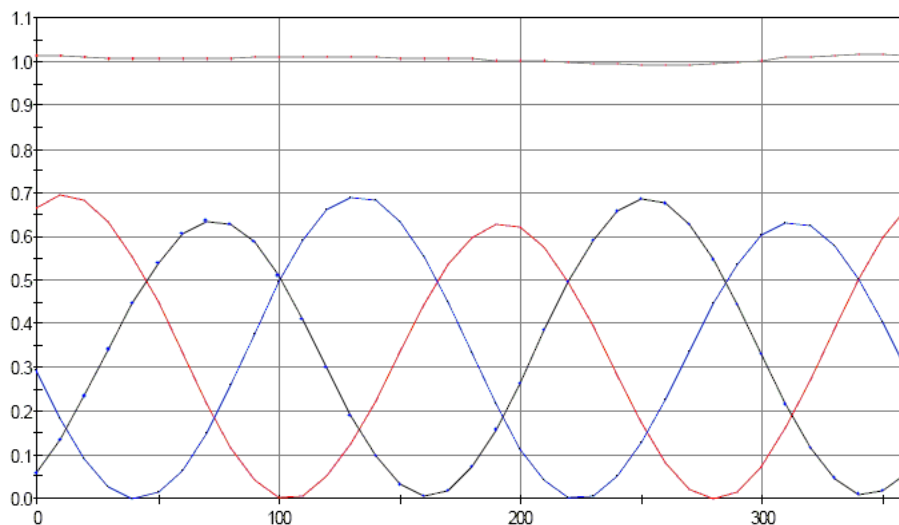


PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA

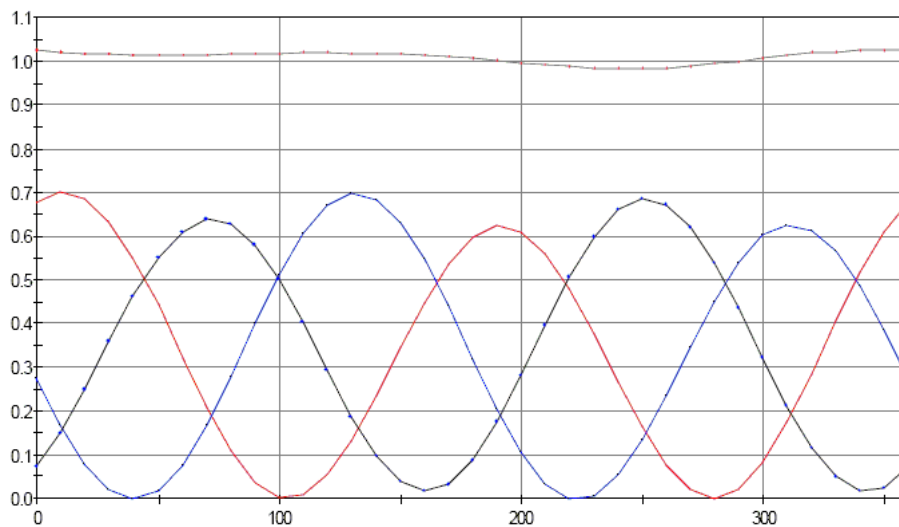
TEM Calibration Plot
Date: 13-Jan-05 04:03:28 pm
Probe Name: PCT005
Frequency: 450

Sensitivity: Ch1: 3.320 Ch2: 3.289 Ch3: 3.267 mV/(mW/cm²)
Isotropy: 1.23% 0.05 db Min=0.993 Max=1.019



TEM Calibration Plot
Date: 13-Jan-05 03:41:45 pm
Probe Name: PCT005
Frequency: 835

Sensitivity: Ch1: 3.807 Ch2: 3.736 Ch3: 3.821 mV/(mW/cm²)
Isotropy: 2.12% 0.09 db Min=0.985 Max=1.028





PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA

TEM Calibration Plot

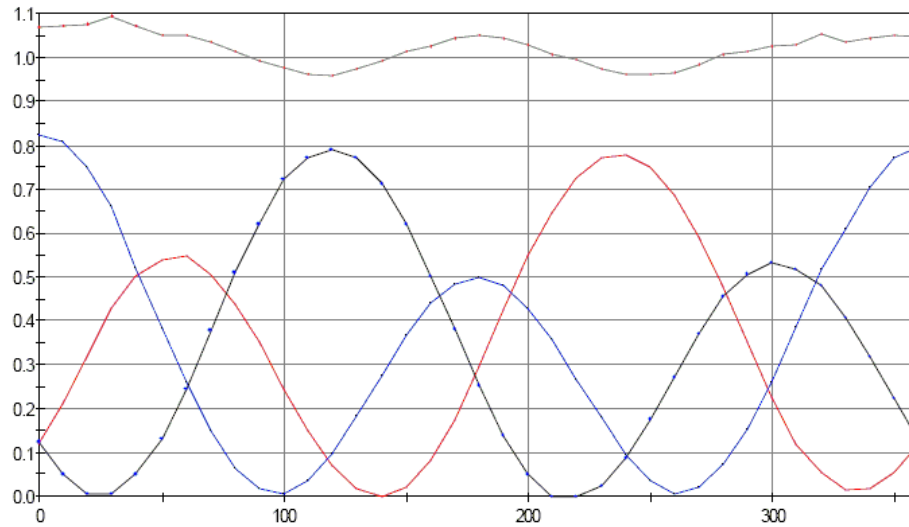
Date: 14-Jan-05 11:08:15 am

Probe Name: PCT005

Frequency: 1900

Sensitivity: Ch1: 5.115 Ch2: 4.969 Ch3: 4.453 mV/(mW/cm²)

Isotropy: 6.79% 0.29 db Min=0.961 Max=1.097



TEM Calibration Plot

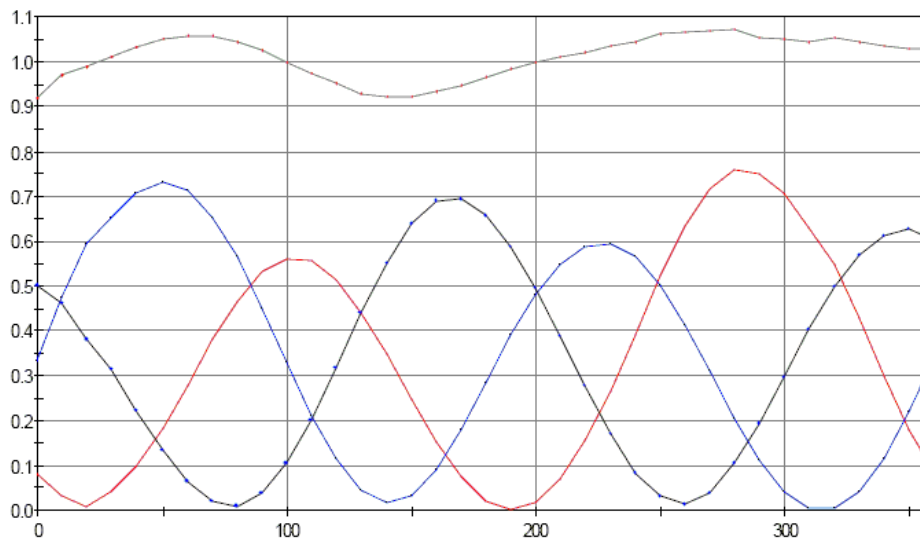
Date: 14-Jan-05 11:38:38 am

Probe Name: PCT005

Frequency: 2100

Sensitivity: Ch1: 5.496 Ch2: 4.887 Ch3: 5.267 mV/(mW/cm²)

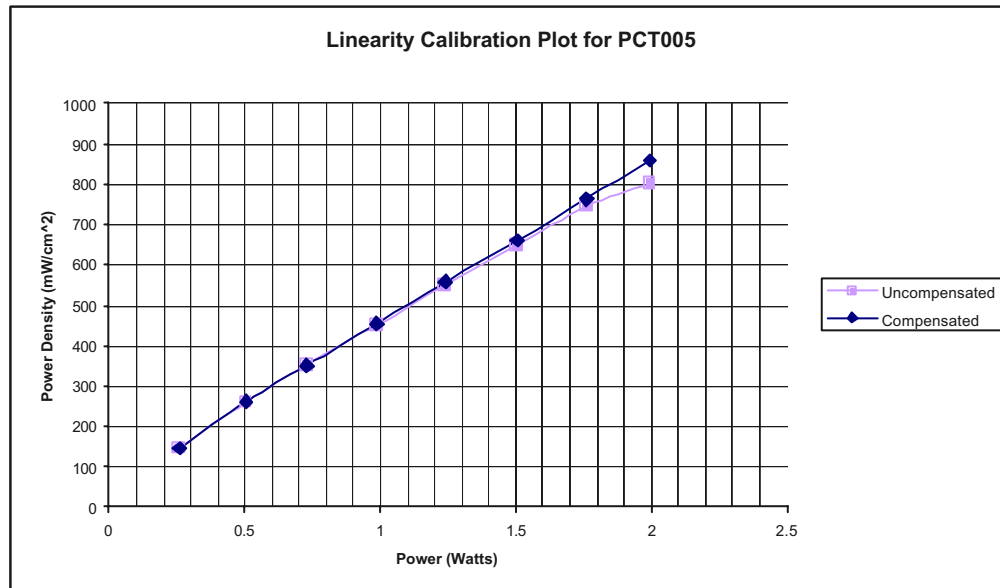
Isotropy: 7.61% 0.32 db Min=0.921 Max=1.074





PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA



Probe Physical Characteristics

Serial Number:	PCT005
Model:	E-020
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte
Tip Diameter:	5 mm
Tip Length:	60 mm
Total Length:	290 mm



PCTEST Calibration Laboratory

6660-B Dobbin Road
Columbia, Maryland 21045 USA

Test Equipment

The test equipment used during the probe calibration are listed as follows:

EQUIPMENT SPECIFICATIONS		
Type	Calibration Due	Asset Number/ Serial Number
CRS Robot F3	February 2007	RAF0134133
CRS C500C Motion Controller	February 2007	RCB0003303
CRS Teach Pendant (Joystick)	February 2007	STP0132231
DELL Computer, Pentium 4 1.6 GHz, Windows 2000™	February 2007	4PJZ111
Flat SAM Phantom (P-SAM-FLAT)	February 2007	94X-097
IDX Robot End Effector (EE-103-C)	February 2007	07111223
IDX Probe Amplifier	February 2007	07111113
Validation Dipole D835V2	October 2006	PCT441
Validation Dipole D1900V2	February 2007	PCT512
Validation Dipole D2450V2	October 2006	PCT641
HP-778D Dual-Directional Coupler (0.1 ~ 2.0 GHz)	November 2006	PCT664
MicroCircuits Directional Coupler (4.0 ~ 8.0 GHz)	November 2006	PE2204-6
Amplifier Research 5S1G4 Power Amp	January 2007	PCT540
IFI T184-10 Power Amplifier (4.0 ~ 18.0 GHz)	December 2006	5957
HP-8241A (250kHz ~ 20 GHz) Signal Generator	December 2006	88934
HP-8753E (30kHz ~ 6GHz) Network Analyzer	January 2007	PCT552
Rohde & Schwarz Power Meter NRVS 1020.1809.02	January 2007	835360/079
Rohde & Schwarz Power Sensor NRV-Z53 858.0500.02	April 2006	846076/007
HP85070B Dielectric Probe Kit	January 2007	PCT501
IFI CC110EXX TEM Cell (DC to 2000 MHz)	January 2007	PCT498
EMCO 3115 Horn Antenna (2.0 ~ 18.0 GHz)	August 2006	PCT496
Guildline 5150 Precision Dual-Thermometer	November 2006	66145