PCTEST ENGINEERING LABORATORY, INC.

6660 – B Dobbin Road · Columbia, MD 21045 · USA Telephone 410.290.6652 / Fax 410.290.6654 http://www.pctestlab.com (email: randy@pctestlab.com) CERTIFICATE OF COMPLIANCE (SAR EVALUATION)



APPLICANT NAME & ADDRESS: SANYO ELECTRIC Co., Ltd. c/o Sanyo Sales & Supply (USA) Corp. 900 North Arlington Heights Road, Suite 300 Itasca, IL 60143-2844

DATE & LOCATION OF TESTING:

Dates of Tests: February 9-12, 2004 Test Report S/N: SAR.240209133.AEZ Test Site: PCTEST Lab, Columbia MD

FCC ID:	AEZSCP-4920
APPLICANT:	SANYO ELECTRIC CO., LTD.
EUT Type:	Tri-Mode Dual-Band Analog/PCS Phone (AMPS/CDMA)
Tx Frequency:	824.04 – 848.97 MHz (AMPS) / 824.70 – 848.31 MHz (CDMA) 1851.25 – 1908.75 MHz (PCS CDMA)
Rx Frequency:	869.04 – 893.97 MHz (AMPS) / 869.70 – 893.31 MHz (CDMA) 1931.25 – 1988.75 MHz (PCS CDMA)
Max. RF Output Power:	0.425 W ERP AMPS (26.285 dBm) / 24.5 dBm Conducted 0.383 W ERP CDMA (25.833 dBm) / 23.5 dBm Conducted 0.503 W EIRP PCS CDMA (27.001 dBm) / 23.5 dBm Conducted
Max. SAR Measurement:	1.130 W/kg AMPS Head SAR; 0.568 W/kg AMPS Body SAR; 0.854 W/kg CDMA Head SAR; 0.465 W/kg CDMA Body SAR; 1.130 W/kg PCS CDMA Head SAR; 1.080 W/kg PCS CDMA Body SAR; 0.213 W/kg PCS CDMA Face
Trade Name/Model(s):	SCP-4920
FCC Classification:	Licensed Portable Transmitter Held to Ear (PCE)
FCC Rule Part(s):	§2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]
Application Type:	Certification
Test Device Serial No.:	identical prototype [S/N: FCC1]

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. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. P1528 D1.2 (April 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 ERP for Part 22 and EIRP for Part 24. SAR compliance for body- worn operating configuration is based on a separation distance of 2.2 cm between the back of the unit and the body of the user. Push-to-Talk PTT operating configuration is based on a separation distance of 2.5 cm from the front of the unit and the face 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.

Alfred Cirwithian

Vice President Engineering

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1. INTRODUCTION / SAR DEFINITION

The FCC has adopted the guidelines for evaluating the environmental effects of radiofrequency 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 C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.* (c) 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in *IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave*[3] is used for guidance in measuring 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.

SAR Definition

Specific Absorption Rate (SAR) 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 (r). 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).

$$S A R = \frac{d}{d t} \left(\frac{d U}{d m} \right) = \frac{d}{d t} \left(\frac{d U}{\mathbf{r} d v} \right)$$

Figure 1.1	
SAR Mathematical	Equation

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

 $s E^2 / r$

SAR =

where:

•		
S	=	conductivity of the tissue-simulant material (S/m)
r	=	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 relations 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]

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2. SAR MEASUREMENT SETUP

Robotic System

Measurements are performed using the DASY4 automated dosimetric assessment system. The DASY4 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Pentium III computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. 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. 2.1).

System Hardware

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Gateway Pentium 4 2.53 GHz computer with Windows XP system and SAR Measurement Software DASY4, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

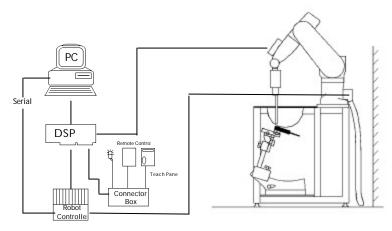


Figure 2.1 SAR Measurement System Setup

System Electronics

The DAE3 consists of a highly sensitive electrometer-grade preamplifier with autozeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail in [7].

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DASY4 E-FIELD PROBE SYSTEM 3.

stopped at reaching the maximum.

Probe Measurement System



Figure 3.1 DAE System

Probe Spe

•		
ecifications		
Calibration:	In air from 10 MHz to 6 GHz	
	In brain and muscle simulating tissue at	04.5 m
	Frequencies of 150 MHz, 450 MHz, 835 MHz, 900 MHz, 1900MHz, 2450MHz, 5300MHz, & 5800MHz	A-BEAM
Frequency:	10 MHz to > 6 GHz; Linearity: $\pm 0.2 \text{ dB}$	Figure 3.1 Triangular Probe
	(30 MHz to 6 GHz)	Configuration
Directivity:	\pm 0.2 dB in HSL (rotation around probe axis)	
	\pm 0.4 dB in HSL (rotation normal probe axis)	
Dynamic:	5 :W/g to > 100 mW/g;	
Range:	Linearity: ± 0.2 dB	
Dimensions:	Overall length: 330 mm	
	Tip length: 16 mm	
	Body diameter: 12 mm	
	Tip diameter: 3 mm	
	Distance from probe tip to dipole centers: 2 mm	
Application:	General dosimetry up to 6 GHz	
	Compliance tests of mobile phones	
	Fast automatic scanning in arbitrary phantoms	Figure 3.2 Probe Thick-Film Technique

The SAR measurements were conducted with the dosimetric probe ET3DV6, designed in the classical triangular configuration [7] (see Fig. 3.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique: with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip (see Fig. 3.3). It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY4 software reads the reflection during a software approach and looks for the maximum using a 2^{nd} order fitting (see Fig.3.1). The approach is

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4. Probe Calibration Process

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure described in [8] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [9] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz (see Fig. 4.1), and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

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 (see Fig. 4.2).

SAR =
$$C \frac{\Delta T}{\Delta t}$$

where:

 Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

 ΔT = temperature increase due to RF exposure.

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;

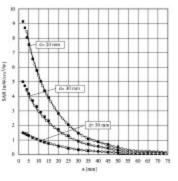
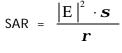


Figure 4.1 E-Field and Temperature measurements at 900MHz [7]



where:

 σ = simulated tissue conductivity,

T = Tissue density (1.25 g/cm³ for brain tissue)

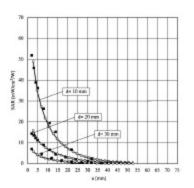


Figure 4.2 E-Field and temperature measurements at 1.9GHz [7]

*NOTE: The temperature calibration was not performed by PCTEST. For information use only.

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5. PHANTOM & EQUIVALENT TISSUES

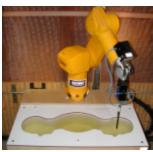
SAM Phantom



Figure 5.1 SAM Twin Phantom

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a wooden table. 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 [11][12]. 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. 5.1)

Brain & Muscle Simulating Mixture Characterization



The brain and muscle mixtures consist of a viscous gel using hydroxethylcellullose (HEC) gelling agent and saline solution (see Table 6.1). Preservation with a bacteriacide 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 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 bee specified in P1528 are derived from the issue 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. Hartsgrove [13].(see Fig. 5.2)

Figure 5.2 Simulated Tissue

115540		•		•		
		SIMULATING TISSUE				
INGREDIENTS		835MHz Brain	835MHz Muscle	1900MHz Brain	1900MHz Muscle	
Mixture Percentage						
WATER		41.45	52.50	54.90	40.40	
DGBE		0.000	0.000	44.92	0.000	
SUGAR		56.00	45.00	0.000	58.00	
SALT		1.450	1.400	0.180	0.500	
BACTERIACIDE		0.100	0.100	0.000	0.100	
HEC		1.000	1.000	0.000	1.000	
Dielectric Constant	Target	41.50	55.20	40.00	53.30	
Conductivity (S/m)	Target	0.900	0.970	1.400	1.520	

Table 5.1 Composition of the Brain & Muscle Tissue Equivalent Matter

Device Holder for Transmitters



In combination with the SAM Twin Phantom V4.0, the Mounting Device (see Fig. 5.2) enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. The devices can be easily, accurately, and repeatably be positioned according to the FCC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations [12]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

Figure 5.2 Mounting Device

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TEST SYSTEM SPECIFICATIONS 6.

Automated Test System Specifications

Positioner

Robot:	
Repeatability:	
No. of axis:	

Stäubli Unimation Corp. Robot Model: RX60L

0.02 mm

Data Acquisition Electronic (DAE) System

Cell Controller	
Processor:	Pentium 4
Clock Speed:	2.53 GHz
Operating System:	Windows XP Professional
Data Converter	
Features:	Signal Amplifier, multiple

6



Figure 6.1 DASY4 Test System

Features:	Signal Amplifier, multiplexer, A/D converter, & control logic
Software:	DASY4 software
Connecting Lines:	Optical downlink for data and status info.
	Optical uplink for commands and clock

PC Interface Card

Function:	24 bit (64 MHz) DSP for real time processing	
	Link to DAE3	
	16 bit A/D converter for surface detection system	
	serial link to robot	
	direct emergency stop output for robot	

E-Field Probes

Model:	ES3DV2	S/N: 3022
Construction:	Triangular core	
Frequency:	10 MHz to 6 GHz	
Linearity:	$\pm \ 0.2 \ \text{dB}$ (30 MH	Hz to 6 GHz)

Phantom

Phantom:	SAM Twin Phantom (V4.0)		
Shell Material:	VIVAC Composite		
Thickness:	2.0 ± 0.2 mm		

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7. DOSIMETRIC ASSESSMENT & PHANTOM SPECS

Measurement Procedure

The evaluation was performed using the following procedure:

- 1. The SAR measurement was taken at a selected spatial reference point to monitor power variations during testing. This fixed location point was measured and used as a reference value.
- 2. The SAR distribution at the exposed side of the head was measured at a distance of 3.9mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm x 15mm.
- 3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 32mm x 32mm x 34mm (fine resolution volume scan, zoom scan) was assessed by measuring 7 x 7 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see Fig. 7.1):
 - a. The data at the surface was extrapolated, since the center of the dipoles is 2.7mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. The extrapolation was based on a least square algorithm [15]. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
 - b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions) [15][16]. The volume was integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
- 4. The SAR reference value, at the same location as procedure #1, was remeasured. If the value changed by more than 5%, the evaluation is repeated.

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 US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. 7.2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.



Figure 7.2 SAM Twin Phantom shell

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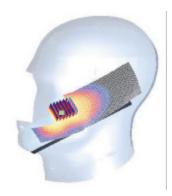


Figure 7.1 Sample SAR Area Scan



8. DEFINITION OF REFERENCE POINTS

EAR Reference Point

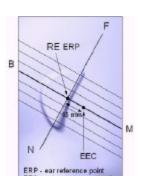


Figure 8.2 Close-up side view of ERPs

Figure 8.1 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 8.2). 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].

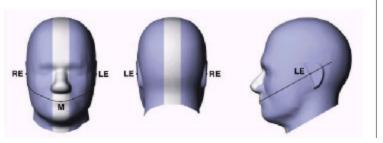


Figure 8.1 Front, back and side view of SAM Twin Phantom

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. 8.3). The "test device reference point" was than 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 it's 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.

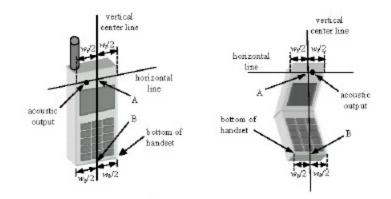


Figure 8.3 Handset Vertical Center & Horizontal Line Reference Points

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9. TEST CONFIGURATION POSITIONS

Positioning for Cheek/Touch

1. The test device was positioned with the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 9.1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.



Figure 9.1 Front, Side and Top View of Cheek/Touch Position

- 2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the ear.
- 3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the plane normal to MB-NF including the line MB (reference plane).
- 4. The phone was hen rotated around the vertical centerline until the phone (horizontal line) was symmetrical was respect to the line NF.
- 5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, the handset was rotated about the line NF until any point on the handset made contact with a phantom point below the ear (cheek). See Figure 9.2)

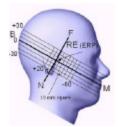


Figure 9.2 Side view w/ relevant markings

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9. TEST CONFIGURATION POSITIONS (Continued)

Positioning for Ear / 15° Tilt

With the test device aligned in the "Cheek/Touch Position":

- 1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degree.
- 2. The phone was then rotated around the horizontal line by 15 degree.
- 3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the phone touches the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. The tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 9.3).





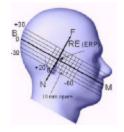


Figure 9.4 Side view w/ relevant markings

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9. TEST CONFIGURATION POSITIONS (Continued)

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 9.5). 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.





Figure 9.5 Body Belt Clip & Holster Configurations

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 where a separation distance between the back of the device and the flat phantom is used. 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 are included in the user's manual.

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10. ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS

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.

Controlled Environment

CONTROLLED ENVIRONMENTS are 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 General Population (W/kg) or (mW/g)				
SPATIAL PEAK SAR ¹ Brain	1.60	8.00				
SPATIAL AVERAGE SAR ² Whole Body	0.08	0.40				
SPATIAL PEAK SAR ³ Hands, Feet, Ankles, Wrists	4.00	20.00				

Table 10.1. Safety Limits for Partial Body Exposure [2]

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.

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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.



11. MEASUREMENT UNCERTAINTIES

а	b	С	d	e=	f	g	h =	i =	k
				f(d,k)		, , , , , , , , , , , , , , , , , , ,	cxf/e	cxq/e	
Uncertainty		Tol.	Prob.	.(0,,	Ci	Ci	1 - g	10 - g	
Component	Sec.	(± %)	Dist.	Div.	(1 - g)	(10 - g)	u _i	ui	vi
Component	000.	(_ /0)	2150	210.	(1 9)	(10 9)	(± %)	(± %)	•1
Measurement System									
Probe Calibration	E1.1	4.8	Ν	1	1	1	4.8	4.8	∞
Axial Isotropy	E1.2	4.7	R	√3	0.7	0.7	1.9	1.9	∞
Hemishperical Isotropy	E1.2	9.6	R	$\sqrt{3}$	0.7	0.7	3.9	3.9	∞
Boundary Effect	E1.3	1.0	R	√3	1	1	0.6	0.6	∞
Linearity	E1.4	4.7	R	√3	1	1	2.7	2.7	∞
System Detection Limits	E1.5	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	∞
Readout Electronics	E1.6	1.0	Ν	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	2.6	R	$\sqrt{3}$	1	1	1.5	1.5	∞
RF Ambient Conditions	E5.1	3.0	R	√3	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	√3	1	1	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E5.3	2.9	R	$\sqrt{3}$	1	1	1.7	1.7	∞
Extrapolation, Interpolation & Integration	E4.2	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	∞
Algorithms for Max. SAR Evaluation									
Test Sample Related									
Test Sample Positioning	E3.2.1	2.9	Ν	1	1	1	2.9	2.9	145
Device Holder Uncertainty	E3.1.1	3.6	Ν	1	1	1	3.6	3.6	5
Output Power Variation - SAR drift	5.6.2	5.0	R	√3	1	1	2.9	2.9	∞
measurement									
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness	E2.1	4.0	R	$\sqrt{3}$	1	1	2.3	2.3	∞
tolerances)									
Liquid Conductivity - deviation from	E2.2	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2	∞
target values									
Liquid Conductivity - measurement	E2.2	2.5	Ν	1	0.64	0.43	1.6	1.1	∞
uncertainty									
Liquid Permittivity - deviation from	E2.2	5.0	R	$\sqrt{3}$	0.6	0.5	1.7	1.4	∞
target values									
Liquid Permittivity - measurement	E2.2	2.5	Ν	1	0.6	0.5	1.5	1.2	∞
uncertainty									
Combined Standard Uncertainty (k=1)			RSS				10.3	10.0	
Expanded Uncertainty (k=2)							20.6	20.1	
(95% CONFIDENCE LEVEL)									

The above measurement uncertainties are according to IEEE Std. P1528 D1.2 (April 2003).

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12. SYSTEM VERIFICATION

Tissue Verification

Table 12.1 Simulated Tissue Verification [5]

MEASURED TISSUE PARAMETERS										
Date(s)	02/09/2004	835M	835MHz Brain 835MHz Muscle		Auscle 1900MHz Brain		1900MHz Muscle			
Liquid Temperature (°C)	21.3	Target	Measured	Target	Measured	Target	Measured	Target	Measured	
Dielectric Constant:	Dielectric Constant: ε		41.08	55.20	53.10	40.00	40.06	53.30	51.11	
Conductivity: o		0.900	0.890	0.970	0.980	1.400	1.410	1.520	1.580	

Prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at 835MHz and 1900MHz by using the system validation kit(s). (Graphic Plots Attached)

Table 12.2	System Validation	i [5]
------------	-------------------	-------

SYSTEM VALIDATION TARGET & MEASURED									
Date:	Amb. Temp (℃)	Liquid Temp (℃)	Input Power (W)	Tissue	Targeted SAR₁g (mW/g)	Measured SARıg (mW/g)	Deviation (%)		
02/10/04	22.7	20.6	0.250	835 MHz Brain	2.375	2.40	1.05		
02/09/04	22.2	20.2	0.100	1900 MHz Brain	3.97	3.73	- 6.04		

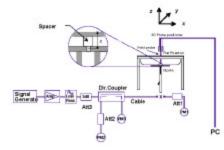




Figure 12.1 Dipole Validation Test Setup

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13. SAR TEST DATA SUMMARY

See Measurement Result Data Pages

Procedures Used To Establish Test Signal

The handset was placed into simulated call mode (AMPS, Cellular CDMA & PCS CDMA modes) using manufacturers test codes. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [4]. When test modes are not available or inappropriate for testing a handset, the actual transmission is activated through a base station simulator or similar equipment. See data pages for actual procedure used in measurement.

Device Test Conditions

The handset is battery operated. Each SAR measurement was taken with a fully charged 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 conducted power deviation of more than 5% occurred, the test was repeated.

EUT Handset Reference Points

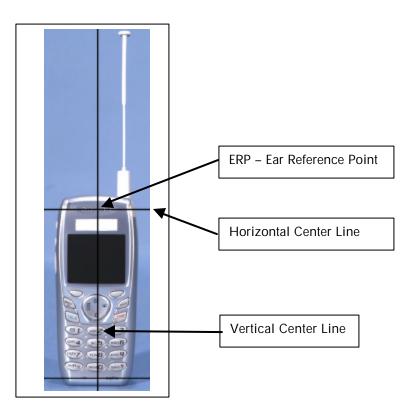


Figure 13.1 Handset Reference Points

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SAR DATA SUMMARY

Mixture Type: 835MHz Brain

14.1 MEASUREMENT RESULTS (AMPS Right Head SAR – Touch)										
FREQU	JENCY	Modulation	Beg	jin / End F	POWER [‡]	Device Test	Antenna	SAR		
MHz	Ch.	wouldton	(dl	3m)	Battery	attery Position		(W/kg)		
824.04	0991	AMPS	24.63	24.51	Standard	Cheek / Touch	In	0.742		
824.04	0991	AMPS	24.52	24.61	Standard	Cheek / Touch	Out	0.866		
836.49	0383	AMPS	24.65	24.62	Standard	Cheek / Touch	In	0.862		
836.49	0383	AMPS	24.62	24.60	Standard	Cheek / Touch	Out	0.717		
848.97	0799	AMPS	24.52	24.44	Standard	Cheek / Touch	In	0.822		
848.97	0799	AMPS	24.45	24.48	Standard	Cheek / Touch	Out	0.888		
ANSI / IEEE C95.1 1992 - SAFETY LIMIT					Brain					
		Spatial	Peak				//kg (mW/g) ged over 1 gram			
Uncontrolled Exposure/General Population				uvoruų	,ou or of a grann					

NOTES:

- The test data reported are the worst-case SAR value with the antenna-head position set in a 1. 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 batteries are the only options.
•••	Battor J to raing on an gou ror an rouaninger	

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.

☑ DASY4

⊠ Conducted

- Left Head
- ⊠ Head
- Manu. Test Codes
- **Base Station Simulator**

Flat Phantom

ERP

IDX

Body

- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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□ EIRP

 \mathbf{X}

Right Head

Hand

Figure 14.1 Right Head SAR Test Setup -- Cheek / Touch Position --

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Mixture Type: 835MHz Brain

14.2	14.2 MEASUREMENT RESULTS (AMPS Right Head SAR – Tilt)										
FREQU	REQUENCY Modulation		Begin / End POWER [‡]			Device Test	Antenna	SAR			
MHz	Ch.	wouldtion	(dl	(dBm)		Position	Position	(W/kg)			
824.04	0991	AMPS	24.61	24.60	Standard	Ear / 15° Tilt	In	0.655			
824.04	0991	AMPS	24.60	24.55	Standard	Ear / 15° Tilt	Out	0.845			
836.49	0383	AMPS	24.65	24.72	Standard	Ear / 15° Tilt	In	0.735			
836.49	0383	AMPS	24.72	24.67	Standard	Ear / 15° Tilt	Out	0.684			
848.97	0799	AMPS	24.47	24.57	Standard	Ear / 15° Tilt	ln	0.781			
848.97	0799	AMPS	24.59	24.44	Standard	Ear / 15° Tilt	Out	0.831			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain				
		Spatial	Peak				V/kg (mW/g)				
	Uncontrolled Exposure/General Population						averaged over 1 gram				

NOTES:

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 batteries are the only options.
υ.	battery is rung charged for an redulings.	Standard Batteries are the only options.

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode

- DASY4Left Head
- 🗵 Head

⊠ Conducted

Manu. Test Codes

ERP

IDX

Body

Flat Phantom

Base Station Simulator

- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

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□ EIRP

 \mathbf{X}

Right Head

Hand

Figure 14.2 Right Head SAR Test Setup -- Ear / Tilt Position --

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Mixture Type: 835MHz Brain

14.3	4.3 MEASUREMENT RESULTS (AMPS Left Head SAR - Touch)										
FREQUENCY		Modulation	Begin / End POWER [‡]			Device Test	Antenna	SAR			
MHz	Ch.	wouldtion	(dl	dBm) Battery		Position	Position	(W/kg)			
824.04	0991	AMPS	24.37	24.48	Standard	Cheek / Touch	In	0.965			
824.04	0991	AMPS	24.49	24.45	Standard	Cheek / Touch	Out	1.120			
836.49	0383	AMPS	24.58	24.58	Standard	Cheek / Touch	In	1.110			
836.49	0383	AMPS	24.58	24.62	Standard	Cheek / Touch	Out	0.911			
848.97	0799	AMPS	24.45	24.39	Standard	Cheek / Touch	In	0.982			
848.97	0799	AMPS	24.41	24.38	Standard	Cheek / Touch	Out	1.120			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain				
		Spatial	Peak				//kg (mW/g)				
Uncontrolled Exposure/General Population						averaç	jed over 1 gram				

NOTES:

7.

The test data reported are the worst-case SAR value with the antenna-head position set in a 1. 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 read	ings. Standard batteries are the only options	S.
0.	Battory is rung on any of an rough	ings: clandara batteries are the only option.	J .

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode

 \mathbf{X} DASY4

⊠ Conducted

- I≍I Left Head
- 🗵 Head
- Manu. Test Codes
- Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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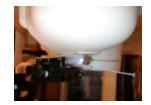


Figure 14.3 Left Head SAR Test Setup -- Cheek / Touch Position --

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- IDX
- Flat Phantom Body

ERP

- **Base Station Simulator**
- - **Right Head** Hand

□ EIRP



Mixture Type: 835MHz Brain

14.4	14.4 MEASUREMENT RESULTS (AMPS Left Head SAR – Tilt)										
FREQU	JENCY	Modulation			POWER [‡]	Device Test	Antenna	SAR			
MHz	Ch.	wouldtion	(dl	(dBm)		Position	Position	(W/kg)			
824.04	0991	AMPS	24.40	24.43	Standard	Ear / 15° Tilt	In	0.829			
824.04	0991	AMPS	24.44	24.39	Standard	Ear / 15° Tilt	Out	1.030			
836.49	0383	AMPS	24.48	24.59	Standard	Ear / 15° Tilt	In	0.974			
836.49	0383	AMPS	24.52	24.46	Standard	Ear / 15° Tilt	Out	0.902			
848.97	0799	AMPS	24.36	24.43	Standard	Ear / 15° Tilt	In	0.996			
848.97	0799	AMPS	24.46	24.39	Standard	Ear / 15° Tilt	Out	1.130			
	ANSI	/ IEEE C95.1 199	92 - SAFE	TY LIMIT			Brain				
		Spatial	Peak				V/kg (mW/g)				
	Uncontrolled Exposure/General Population						averaged over 1 gram				

NOTES:

7.

The test data reported are the worst-case SAR value with the antenna-head position set in a 1. 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.

2	Pattory is fully charged for all readings	Standard batteries are the only options.
э.	ballery is fully charged for all readings.	

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.

- ⊠ DASY4 ☑ Left Head
- Head X

⊠ Conducted

- Manu. Test Codes
- Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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Figure 14.4 Left Head SAR Test Setup -- Ear / Tilt Position --

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IDX

ERP

Right Head

□ EIRP

- **Base Station Simulator**
- - Hand
- Flat Phantom Body



Mixture Type: 835MHz Brain

14.5	14.5 MEASUREMENT RESULTS (CDMA Right Head SAR – Touch)										
FREQU	JENCY	Modulation	Device Test Antenna		SAR						
MHz	Ch.	woodlation	(dl	3m)	Battery	Position	Position	(W/kg)			
836.49	0383	CDMA	24.43	24.35	Standard	Cheek / Touch	In	0.694			
836.49	0383	CDMA	24.47	24.42	Standard	Cheek / Touch	Out	0.718			
		/ IEEE C95.1 199 Spatial rolled Exposure	Peak			1.6 W	Brain //kg (mW/g) ed over 1 gram				

NOTES:

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 batteries are the only options.

	[‡] Power Measured	X	Conducted	ERP		EIRP
4.	SAR Measurement System	X	DASY4	IDX		
	Phantom Configuration		Left Head	Flat Phantom	X	Right Head
5.	SAR Configuration	\mathbf{X}	Head	Body		Hand
6.	Test Signal Call Mode	\mathbf{X}	Manu. Test Codes	Base Station Simula	tor	
7.	Tissue parameters and temperatures are lis	ted o	n the SAR plots.			

- 8. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$
- 9. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (July, 2001), if the SAR measured at the middle channel for each test configuration (left, right, cheek/touch, tilt/ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s).

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Figure 14.5 Right Head SAR Test Setup -- Cheek / Touch Position --

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Mixture Type:	835MHz Brain
---------------	--------------

14.6 MEASUREMENT RESULTS (CDMA Right Head SAR - Tilt)									
FREQU	JENCY	Begin /		in / End F	POWER [‡]	Device Test	Antenna	SAR	
MHz	Ch.	wouldton	(dBm)		Battery	Position	Position	(W/kg)	
836.49	0383	CDMA	23.51	23.54	Standard	Ear / 15° Tilt	In	0.702	
836.49	0383	CDMA	23.57	23.61	Standard	Ear / 15° Tilt	Out	0.716	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population							Brain //kg (mW/g) ^{jed over 1} gram		

NOTES:

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].

X

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.
 - [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode
- HeadManu. Test Codes

Left Head

⊠ Conducted

DASY4

□ ERP

IDX

Body

Flat Phantom

Base Station Simulator

- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. ± 0.1
- 9. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (July, 2001), if the SAR measured at the middle channel for each test configuration (left, right, cheek/touch, tilt/ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s).

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□ EIRP

Right Head

Hand

 $|\mathbf{X}|$

Figure 14.6 Right Head SAR Test Setup -- Ear / Tilt Position --

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Mixture Type: 835MHz Brain

14.7	14.7 MEASUREMENT RESULTS (CDMA Left Head SAR – Touch)								
FREQU	REQUENCY Begin / End POWER [‡]		Device Test	Antenna	SAR				
MHz	Ch.	modulation	(dBm)		Battery	Position	Position	(W/kg)	
836.49	0383	CDMA	23.40	23.37	Standard	Cheek / Touch	In	0.812	
836.49	0383	CDMA	23.47	23.45	Standard	Cheek / Touch	Out	0.836	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population							Brain //kg (mW/g) ged over 1 gram		

NOTES:

- 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 batteries are the only options.

	[‡] Power Measured	X	Conducted	ERP		EIRP
4.	SAR Measurement System	X	DASY4	IDX		
	Phantom Configuration		Left Head	Flat Phantom	X	Right Head
5.	SAR Configuration	X	Head	Body		Hand
6.	Test Signal Call Mode	X	Manu. Test Codes	Base Station Simula	tor	
7.	Tissue parameters and temperatures are list	ted o	n the SAR plots.			

- 8. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$
- 9. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (July, 2001), if the SAR measured at the middle channel for each test configuration (left, right, cheek/touch, tilt/ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s).

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Figure 14.7 Left Head SAR Test Setup -- Cheek / Touch Position --

PC	CTESTÔ SAR REPORT	PCTEST	CC CERTIFICATION	SANYO	Reviewed by: Quality Manager
	AR Filename: AR-240209133.AEZ	Test Dates: February 9-12, 2004	Phone Type: Tri-Mode Dual-Band Phone	FCC ID: AEZSCP-4920	Page 24 of 36



Mixture Type: 835MHz Brain

14.8 MEASUREMENT RESULTS (CDMA Left Head SAR - Tilt)									
FREQU	IENCY	Begin / End POWER [‡]		Device Test	Antenna	SAR			
MHz	Ch.	Modulation	(dBm)		Battery	Position	Position	(W/kg)	
836.49	0383	CDMA	23.44	23.40	Standard	Ear / 15° Tilt	In	0.821	
836.49	0383	CDMA	23.48	23.41	Standard	Ear / 15° Tilt	Out	0.854	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						1.6 W	Brain //kg (mW/g) Jed over 1 gram		

NOTES:

The test data reported are the worst-case SAR value with the antenna-head position set in a 1. typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

X

X

⊠ Conducted

DASY4

- All modes of operation were investigated, and worst-case results are reported. 2.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.
- [‡]Power Measured
- SAR Measurement System 4.
 - Phantom Configuration
- 5. SAR Configuration

- Left Head ⊠ Head
- Body **Base Station Simulator**

Flat Phantom

ERP

IDX

Right Head Hand

□ EIRP

- 6. Test Signal Call Mode
- Manu. Test Codes 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1
- 9. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (July, 2001), if the SAR measured at the middle channel for each test configuration (left, right, cheek/touch, tilt/ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s).

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Figure 14.8 Left Head SAR Test Setup -- Ear / Tilt Position --

PCTESTÔ SAR REPORT		FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 25 of 36
SAR-240209133.AEZ	February 9-12, 2004	Tri-Mode Dual-Band Phone	AEZSCP-4920	



Mixture Type: 1900MHz Brain

14.9 I	14.9 MEASUREMENT RESULTS (PCS CDMA Right Head SAR – Touch)								
FREQU	IENCY	Modulation	Begin / End POWER [‡]		Device Test	Antenna	SAR		
MHz	Ch.	wouldton	(dBm)		Battery	Position	Position	(W/kg)	
1851.25	0025	PCS CDMA	23.88	23.68	Standard	Cheek / Touch	In	0.731	
1851.25	0025	PCS CDMA	23.67	23.80	Standard	Cheek / Touch	Out	0.218	
1880.00	0600	PCS CDMA	23.62	23.67	Standard	Cheek / Touch	In	0.710	
1880.00	0600	PCS CDMA	23.65	23.64	Standard	Cheek / Touch	Out	0.236	
1908.75	1175	PCS CDMA	23.62	23.65	Standard	Cheek / Touch	In	0.692	
1908.75	1175	PCS CDMA	23.68	23.56	Standard	Cheek / Touch	Out	0.237	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT							Brain		
	Spatial Peak						1.6 W/kg (mW/g) averaged over 1 gram		
	Uncontrolled Exposure/General Population								

NOTES:

The test data reported are the worst-case SAR value with the antenna-head position set in a 1. typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

⊠ Conducted

DASY4

⊠ Head

□ Left Head

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.
 - [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.
- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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Figure 14.9 Right Head SAR Test Setup -- Cheek / Touch Position --

PCTESTÔ SAR REPORT		CC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 26 of 36
SAR-240209133.AEZ	February 9-12, 2004	Tri-Mode Dual-Band Phone	AEZSCP-4920	

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ERP

- □ EIRP
- □ Flat Phantom
- - **Right Head** Hand
 - Body
- 🗵 Manu. Test Codes 🔲 **Base Station Simulator**
- IDX
- \mathbf{X}



Mixture Type: 1900MHz Brain

14.10	14.10 MEASUREMENT RESULTS (PCS CDMA Right Head SAR – Tilt)								
FREQU	IENCY	Modulation	Begin / End POWER [‡]		Device Test	Antenna	SAR		
MHz	Ch.	Wouldtion	(dł	3m)	Battery	Position	Position	(W/kg)	
1851.25	0025	PCS CDMA	23.78	23.68	Standard	Ear / 15° Tilt	In	0.881	
1851.25	0025	PCS CDMA	23.67	23.94	Standard	Ear / 15° Tilt	Out	0.518	
1880.00	0600	PCS CDMA	23.58	23.52	Standard	Ear / 15° Tilt	In	0.870	
1880.00	0600	PCS CDMA	23.54	23.56	Standard	Ear / 15° Tilt	Out	0.479	
1908.75	1175	PCS CDMA	23.54	23.58	Standard	Ear / 15° Tilt	In	0.902	
1908.75	1175	PCS CDMA	23.56	23.50	Standard	Ear / 15° Tilt	Out	0.500	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain		
	Spatial Peak						1.6 W/kg (mW/g) averaged over 1 gram		
	Uncontrolled Exposure/General Population								

NOTES:

The test data reported are the worst-case SAR value with the antenna-head position set in a 1. typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

⊠ Conducted

Left Head

⊠ DASY4

⊠ Head

ERP

IDX

Body

Flat Phantom

Base Station Simulator

All modes of operation were investigated, and worst-case results are reported. 2.

3.	Battery is fully charged for all readings.	Standard batteries are the only options.
υ.	battory is rung on argou for an roadings.	olaridara ballorios aro trio ornij options.

- [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.
- Manu. Test Codes Tissue parameters and temperatures are listed on the SAR plots.
- 7. 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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□ EIRP

 \mathbf{X}

Right Head

Hand

Figure 14.10 Right Head SAR Test Setup -- Ear / Tilt Position --

PCTESTÔ SAR REPORT		FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 27 of 36
SAR-240209133.AEZ	February 9-12, 2004	Tri-Mode Dual-Band Phone	AEZSCP-4920	



Mixture Type: 1900MHz Brain

14.11	MEAS	SUREMENT	A Left Head S	AR – Tou	uch)				
FREQUENCY		Modulation	Beg	Begin / End POWER [‡]		Device Test	Antenna	SAR	
MHz	Ch.	Wouldtion	(dl	(dBm) Battery		Position	Position	(W/kg)	
1851.25	0025	PCS CDMA	23.75	23.81	Standard	Cheek / Touch	In	1.050	
1851.25	0025	PCS CDMA	23.75	23.81	Standard	Cheek / Touch	Out	0.306	
1880.00	0600	PCS CDMA	23.58	23.59	Standard	Cheek / Touch	In	0.943	
1880.00	0600	PCS CDMA	23.57	23.55	Standard	Cheek / Touch	Out	0.324	
1908.75	1175	PCS CDMA	23.53	23.58	Standard	Cheek / Touch	In	0.910	
1908.75	1175	PCS CDMA	23.56	23.57	Standard	Cheek / Touch	Out	0.298	
	ANSI	/ IEEE C95.1 199		Brain					
		Spatial		//kg (mW/g) led over 1 gram					
	Uncontrolled Exposure/General Population						averaged over 1 grann		

NOTES:

- 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 batteries are the only options.
 - [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode

IX Left Head

⊠ Conducted

🗵 Head

DASY4

- Heau
- 🗵 Manu. Test Codes 🗖 Base Station Simulator

□ ERP

IDX

Body

Flat Phantom

- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

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□ EIRP

Right Head

Hand

Figure 14.11 Left Head SAR Test Setup -- Cheek / Touch Position --

PCTESTÔ SAR REPORT	F	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 28 of 36
SAR-240209133.AEZ	February 9-12, 2004	Tri-Mode Dual-Band Phone	AEZSCP-4920	



Mixture Type: 1900MHz Brain

14.12	MEAS	UREMENT	RESU	LTS (P	CS CDM	A Left Head S	SAR – Tilt)
FREQUENCY		Modulation	Beg	Begin / End POWER [‡]		Device Test	Antenna	SAR
MHz	Ch.	wouldton	(dł	3m)	Battery	Position	Position	(W/kg)
1851.25	0025	PCS CDMA	23.80	23.82	Standard	Ear / 15° Tilt	In	1.060
1851.25	0025	PCS CDMA	23.80	23.78	Standard	Ear / 15° Tilt	Out	0.527
1880.00	0600	PCS CDMA	23.54	23.53	Standard	Ear / 15° Tilt	In	1.130
1880.00	0600	PCS CDMA	23.54	23.56	Standard	Ear / 15° Tilt	Out	0.681
1908.75	1175	PCS CDMA	23.51	23.45	Standard	Ear / 15° Tilt	In	1.050
1908.75	1175	PCS CDMA	23.49	23.57	Standard	Ear / 15° Tilt	Out	0.657
	ANSI	/ IEEE C95.1 19		Brain				
		Spatial		V/kg (mW/g)				
	Uncont	rolled Exposure	averaged over 1 gram					

NOTES:

- 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.

2	Pattory is fully charged for all readings	Standard batteries are the only options.
э.	ballery is fully charged for all readings.	

- [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.

- ⊠ DASY4 ☑ Left Head
- ⊠ Head

⊠ Conducted

- Manu. Test Codes
- Tissue parameters and temperatures are listed on the SAR plots. 7.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

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Figure 14.12 Left Head SAR Test Setup -- Ear / Tilt Position --

PCTESTÔ SAR REPORT	Porest	FCC CERTIFICATION SANYO		Reviewed by: Quality Manager
SAR Filename: SAR-240209133.AEZ	Test Dates: February 9-12, 2004	Phone Type: Tri-Mode Dual-Band Phone	FCC ID: AEZSCP-4920	Page 29 of 36

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- IDX
 - Flat Phantom Body
- **Right Head**

□ EIRP

- Hand
- **Base Station Simulator**

ERP



Mixture Type: 835MHz Muscle

14.13	MEAS	UREMENT	MPS Bod	y SAR w/o Ho	olster)			
FREQU	FREQUENCY Modulation Begin / End POWER [‡]				Separation	Antenna	SAR	
MHz	Ch.	Woodlation	(dl	3m)	Battery	Distance (cm) ¹¹	Position	(W/kg)
824.04	0991	AMPS	24.67	24.67	Standard	2.2 [w/o Holster]	In	0.559
824.04	0991	AMPS	24.69	24.67	Standard	2.2 [w/o Holster]	Out	0.484
836.49	0383	AMPS	24.73	24.69	Standard	2.2 [w/o Holster]	In	0.493
836.49	0383	AMPS	24.84	24.74	Standard	2.2 [w/o Holster]	Out	0.374
848.97	0799	AMPS	24.62	24.56	Standard	2.2 [w/o Holster]	In	0.568
848.97	0799	AMPS	24.71	24.72	Standard	2.2 [w/o Holster]	Out	0.467
	ANSI /	/ IEEE C95.1 199	ח	Muscle				
		Spatial		/kg (mW/g) ed over 1 gram				
	Uncont	rolled Exposure	averay	eu over i graffi				

NOTES:

The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. 1. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

⊠ Conducted

DASY4

Head

Left Head

□ With Belt-clip

Manu. Test Codes

X

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.
- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- Test Signal Call Mode 6.
- 7. ^{‡‡}Test Configuration
- Tissue parameters and temperatures are listed on the SAR plots. 8.
- 9. Both sides of the phone were tested and the worst-case side is reported.
- 10. Liquid tissue depth is 15.1 cm. \pm 0.1

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Figure 14.13 Body SAR Test Setup -- w/o Holster --

PCTESTÔ SAR REPORT	POTEST	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename: SAR-240209133.AEZ	Test Dates: February 9-12, 2004	Phone Type: Tri-Mode Dual-Band Phone	FCC ID: AEZSCP-4920	Page 30 of 36

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▼ Flat Phantom Body

ERP

IDX

X

- Right Head
 - Hand

EIRP

- **Base Station Simulator**
- \mathbf{X} Without Belt-clip



Mixture Type: 835MHz Muscle

14.14 MEASUREMENT RESULTS (CDMA Body SAR w/o Holster) FREQUENCY Begin / End POWER[‡] Antenna SAR Separation Modulation Distance (cm)^{‡‡} Position (W/kg) MHz (dBm) Ch. Battery 824.70 1013 CDMA 23.75 23.71 Standard 2.2 [w/o Holster] In 0.465 824.70 1013 CDMA 23.74 23.72 Standard Out 0.409 2.2 [w/o Holster] Standard 836.49 0383 CDMA 23.71 23.80 In 0.392 2.2 [w/o Holster] 836.49 0383 CDMA 23.76 23.75 Standard 0.300 2.2 [w/o Holster] Out 848.31 0777 CDMA 23.61 23.59 Standard In 0.446 2.2 [w/o Holster] 848.31 0777 CDMA 23.59 23.59 Standard 2.2 [w/o Holster] Out 0.385 ANSI / IEEE C95.1 1992 - SAFETY LIMIT Muscle 1.6 W/kg (mW/g) **Spatial Peak** averaged over 1 gram **Uncontrolled Exposure/General Population**

NOTES:

- 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.	Pattory is fully charged for all readings	Standard batteries are the only options.
э.	ballery is fully charged for all readings.	

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode
- 7. ^{##}Test Configuration
- 8. Tissue parameters and temperatures are listed on the SAR plots.

9. Both sides of the phone were tested and the worst-case side is reported.

10. Liquid tissue depth is 15.1 cm. \pm 0.1

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Figure 14.14 Body SAR Test Setup -- w/o Holster --

PCTESTÔ SAR REPORT	Porest	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename: SAR-240209133.AEZ	Test Dates: February 9-12, 2004	Phone Type: Tri-Mode Dual-Band Phone	FCC ID: AEZSCP-4920	Page 31 of 36

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☑ DASY4□ Left Head

⊠ Conducted

- □ Head
- 🗵 Manu. Test Codes
- □ With Belt-clip
- ☑ Flat Phantom☑ Body

□ ERP

IDX

Right HeadHand

EIRP

- Base Station Simulator
- ☑ Without Belt-clip



Mixture Type: 1900MHz Muscle

14.15	MEAS	UREMENT	A Body SAR w	/o Holst	er)			
FREQU	IENCY	Modulation	Beg	Begin / End POWER [‡]		Separation	Antenna	SAR
MHz	Ch.	modulation	(dł	3m)	Battery	Distance (cm) ^{‡‡}	Position	(W/kg)
1851.25	0025	PCS CDMA	23.83	23.85	Standard	2.2 [w/o Holster]	In	0.400
1851.25	0025	PCS CDMA	23.90	23.90	Standard	2.2 [w/o Holster]	Out	0.906
1880.00	0600	PCS CDMA	23.61	23.64	Standard	2.2 [w/o Holster]	In	0.361
1880.00	0600	PCS CDMA	23.59	23.70	Standard	2.2 [w/o Holster]	Out	1.080
1908.75	1175	PCS CDMA	23.62	23.61	Standard	2.2 [w/o Holster]	In	0.340
1908.75	1175	PCS CDMA	23.66	23.67	Standard	2.2 [w/o Holster]	Out	1.020
	ANSI	/ IEEE C95.1 199	Γ	/luscl e				
		Spatial		/kg (mW/g)				
	Uncont	rolled Exposure	averag	ed over 1 gram				

NOTES:

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].

⊠ Conducted

Head

With Belt-clip

 \mathbf{X}

- 2. All modes of operation were investigated, and worst-case results are reported.
- Battery is fully charged for all readings. Standard batteries are the only options. 3.
- [‡]Power Measured 4. SAR Measurement System
- Phantom Configuration 5.
- SAR Configuration Test Signal Call Mode 6.
- 7.
- ^{‡‡}Test Configuration
- 8. Tissue parameters and temperatures are listed on the SAR plots.
- 9. Both sides of the phone were tested and the worst-case side is reported.
- 10. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

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Figure 14.15 Body SAR Test Setup -- w/o Belt-clip --

PCTESTÔ SAR REPORT	Porest	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 32 of 36
SAR-240209133.AEZ	February 9-12, 2004	Tri-Mode Dual-Band Phone	AEZSCP-4920	

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- DASY4 □ Left Head ▼ Flat Phantom
- \mathbf{X} Body Manu. Test Codes

ERP

IDX

- \mathbf{X} Without Belt-clip
- **Base Station Simulator**
- Right Head

Hand

EIRP



Mixture Type: 1900MHz Brain

14.16	MEAS	UREMENT	RESU	LTS (F	ace SAR /	Push To Tall	()	
FREQUENCY		Modulation	Begin / End POWER [‡]		Separation	Antenna	SAR	
MHz	Ch.	wouldton	(dl	3m)	Battery	Distance (cm)	Position	(W/kg)
1851.25	0025	PCS CDMA	23.84	23.82	Standard	2.5	In	0.213
1851.25	0025	PCS CDMA	23.84	23.85	Standard	2.5	Out	0.105
1880.00	0600	PCS CDMA	23.61	23.62	Standard	2.5	In	0.194
1880.00	0600	PCS CDMA	23.64	23.61	Standard	2.5	Out	0.134
1908.75	1175	PCS CDMA	23.56	23.57	Standard	2.5	In	0.195
1908.75	1175	PCS CDMA	23.55	23.62	Standard	2.5	Out	0.123
ANSI / IEEE C95.1 1992 - SAFETY LIMIT							Muscle	
Spatial Peak Uncontrolled Exposure/General Population					1.6 W/kg (mW/g) averaged over 1 gram			

NOTES:

- The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. 1. 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 batteries are the only options.			
	[‡] Power Measured	X	Conducted		ERP

 \mathbf{X}

- SAR Measurement System 4. Phantom Configuration
- 5. SAR Configuration
- 6.
- Test Signal Call Mode
- 7. ^{‡‡}Test Configuration
- 8. Tissue parameters and temperatures are listed on the SAR plots.

9. Both sides of the phone were tested and the worst-case side is reported.

10. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

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Figure 14.16 Face SAR Test Setup -- Push To Talk --

PCTE	ESTÔ SAR REPORT	FCC CERTIFICATION		SANYO	Reviewed by: Quality Manager
	Filename: 240209133.AEZ	Test Dates: February 9-12, 2004	Phone Type: Tri-Mode Dual-Band Phone	FCC ID: AEZSCP-4920	Page 33 of 36

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- DASY4 Left Head Head
- Manu. Test Codes

□ With Belt-clip

☑ Without Belt-clip

Flat Phantom

IDX

Body

 \mathbf{X}

 \mathbf{X}

□ EIRP

Right Head

- Hand
- **Base Station Simulator**



15. SAR TEST EQUIPMENT

Equipment Calibration

Table 15.1 Test Equipment Calibration

EQUIPMENT SPECIFICATIONS

Туре		Calibration Date	Serial Number
Stäubli Robot RX60L		February 2004	599131-01
Stäubli Robot Controller		February 2004	PCT592
Stäubli Teach Pendant (Joystick)		February 2004	3323-00161
Micron Computer, 450 MHz Pentium III, W	/indows NT	February 2004	PCT577
SPEAG EDC3		February 2004	321
SPEAG DAE3		January 2004	445
SPEAG E-Field Probe ES3DV2		September 2003	3022
SPEAG Dummy Probe		February 2004	PCT583
SPEAG SAM Twin Phantom V4.0		February 2004	PCT666
SPEAG Light Alignment Sensor		February 2004	205
PCTEST Validation Dipole D300V2		September 2003	PCT301
SPEAG Validation Dipole D835V2		February 2003	PCT512
SPEAG Validation Dipole D1900V2		February 2003	PCT613
Brain Equivalent Matter (300MHz)		February 2004	PCTBEM601
Brain Equivalent Matter (835MHz)		February 2004	PCTBEM101
Brain Equivalent Matter (1900MHz)		February 2004	PCTBEM301
Muscle Equivalent Matter (300MHz)		February 2004	PCTMEM701
Muscle Equivalent Matter (835MHz)		February 2004	PCTMEM201
Muscle Equivalent Matter (1900MHz)		February 2004	PCTMEM401
Microwave Amp. Model: 5S1G4, (800MHz	z - 4.2GHz)	January 2004	22332
Gigatronics 8651A Power Meter		January 2004	1835299
HP-8648D (9kHz ~ 4GHz) Signal Gene	erator	January 2004	PCT530
Amplifier Research 5S1G4 Power Amp		January 2004	PCT540
HP-8753E (30kHz ~ 3GHz) Network A	nalyzer	January 2004	PCT552
HP85070B Dielectric Probe Kit		January 2004	PCT501
Ambient Noise/Reflection, etc. <1	2mW/kg/<3%of SAR	January 2004	Anechoic Room PCT01

NOTE:

The E-field probe was calibrated by SPEAG, by waveguide technique procedure. Dipole Validation measurement is 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.

PCTESTÔ SAR REPORT		FCC CERTIFICATION	C CERTIFICATION	
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 34 of 36
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16. CONCLUSION

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]

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