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 Fisher (USA) Corp. 218 Route 17 North Rochelle Park, NJ 07662 Attn: Mr. Koichi Takahashi, V.P. Marketing SANYO Fisher (USA) Corporation) DATE & LOCATION OF TESTING: Dates of Tests: June 9-12, 2003 Test Report S/N: 22/24.230609274.AEZ Test Site: PCTEST Lab, Columbia MD

FCC ID:	AEZSCP-54H				
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:	0.399 W ERP AMPS (26.009 dBm) / 24.5 dBm Conducted				
-	0.397 W ERP CDMA (25.993 dBm) / 24.5 dBm Conducted				
	0.428 W EIRP PCS CDMA (26.301 dBm) / 24.0 dBm Conducted				
Max. SAR Measurement:	0.910 W/kg AMPS Head SAR; 0.543W/kg AMPS Body SAR;				
	0.709W/kg CDMA Head SAR; 0.435W/kg CDMA Body SAR;				
	1.160 W/kg PCS CDMA Head SAR; 0.881 W/kg PCS CDMA Body SAR				
	0.216 W/kg AMPS Mouth (Flip Open); 0.259 W/kg AMPS Mouth (Flip Close);				
	0.212 W/kg CDMA Mouth (Flip Open); 0.261 W/kg CDMA Mouth (Flip Close);				
	0.191 W/kg PCS CDMA Mouth (Flip Open); 0.193 W/kg PCS CDMA Mouth (Flip Closed				
Trade Name/Model(s):	SCP-5400				
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. 1528-200X (Draft 6.5, January 15, 2002).

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 bodyworn operating configuration is based on a separation distance of 1.9 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.



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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:

0.		
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 Micron Pentium III 500 MHz computer with Windows NT 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.

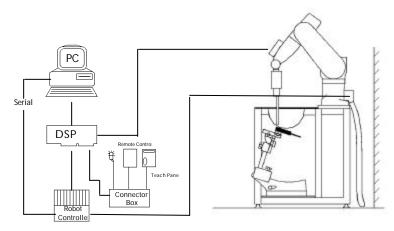


Figure 2.1 SAR Measurement System Setup

System Electronics

The DAE4 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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3. DASY4 E-FIELD PROBE SYSTEM

stopped at reaching the maximum.

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 to probe angle. The DASY4 software reads the reflection during a software approach and looks for the maximum using a 2^{rd} order fitting (see Fig.3.1). The approach is

Probe Measurement System



Figure 3.1 DAE System

Probe Specifications

Calibration:	In air from 10 MHz to 2.5 GHz	
	In brain and muscle simulating tissue at	
	Frequencies of 450 MHz, 835 MHz, 900 MHz	
	1900MHz, 2450MHz	
Frequency:	10 MHz to > 2.5 GHz; Linearity: ± 0.2 dB	
	(30 MHz to 2.5 GHz)	Fig
Directivity:	±0.2 dB in HSL (rotation around probe axis)	
	±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: 6.8 mm	
	Distance from probe tip to dipole centers: 2.7 mm	n
Application:	General dosimetry up to 2.5 GHz	
	Compliance tests of mobile phones	
	Fast automatic scanning in arbitrary phantoms	

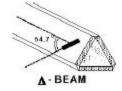


Figure 3.1 Triangular Probe Configuration



Figure 3.2 Probe Thick-Film Technique

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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;

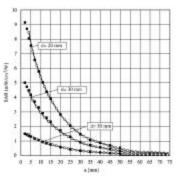
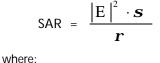


Figure 4.1 E-Field and Temperature measurements at 900MHz [7]



 σ = simulated tissue conductivity,

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

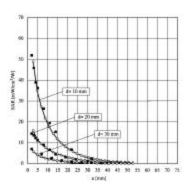


Figure 4.2 E-Field and temperature measurements at 1.9GHz [7]

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

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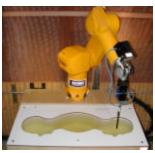


5. PHANTOM & EQUIVALENT TISSUES

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)

Table 5.1 Composition of the Brain & Muscle Tissue Equivalent Matter

Figure 5.2 Simulated

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		

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

6

Cell Controller	
Processor:	Pentium III
Clock Speed:	450 MHz
Operating System:	Windows NT
Data Card:	DASY4 PC-Board

Data Converter

d



Figure 6.1 DASY3 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:	ET3DV6	S/N: 1560
Construction:	Triangular core	fiber optic detection system
Frequency:	10 MHz to 2.5 (GHz
Linearity:	± 0.2 dB (30 Mł	Hz to 2.5 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 20mm x 20mm.
- 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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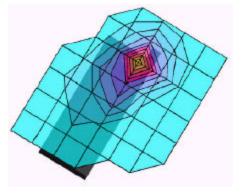


Figure 7.1 Sample SAR Area Scan



8. DEFINITION OF REFERENCE POINTS

EAR Reference Point

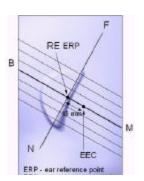


Figure 8.2 Close-up side view of ERPs

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].

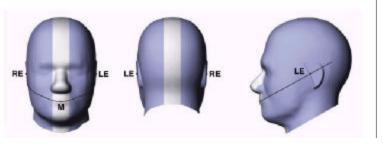


Figure 8.1 Front, back and side view of SAM Twin Phantom

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.

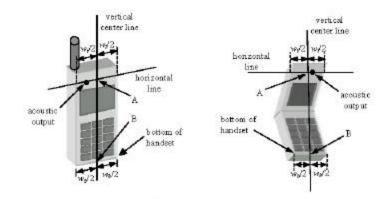


Figure 8.3 Handset Vertical Center & Horizontal Line Reference Points

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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)

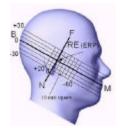


Figure 9.2 Side view w/ relevant markings

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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).





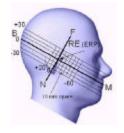


Figure 9.4 Side view w/ relevant markings

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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	cxg/e	
Uncertainty		Tol.	Prob.		Ci	Ci	1 - g	10 - g	
Component	Sec.	(± %)	Dist.	Div.	(1 - g)	(10 - g)	Ui	Ui	Vi
							(± %)	(± %)	
Measurement System									
Probe Calibration	E1.1	4.8	Ν	1	1	1	4.8	4.8	∞
Axial Isotropy	E1.2	4.7	R	$\sqrt{3}$	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	$\sqrt{3}$	1	1	0.6	0.6	∞
Linearity	E1.4	4.7	R	$\sqrt{3}$	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	$\sqrt{3}$	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	$\sqrt{3}$	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	$\sqrt{3}$	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. 1528-200x (July, 2001)

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12. SYSTEM VERIFICATION

Tissue Verification

Table 12.1 Simulated Tissue Verification [5]

	MEASURED TISSUE PARAMETERS										
Date(s)	06-09-03	835M	Hz Brain	Iz Brain 835MHz Muscle		1900MHz Brain		1900MHz Muscle			
Liquid Temperature (°C)	Target	Measured	Target	Measured	Target	Measured	Target	Measured			
Dielectric Constant: ε		41.50	40.78	55.20	52.9	40.00	39.10	53.30	51.59		
Conductivity: σ	0.900	0.930	0.970	0.990	1.400	1.380	1.520	1.46			

Test System Validation

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 [5]

	SYSTEM	DIPOLE VALIDATION TA	ARGET & MEASURED	
System Validation Kit:	835MHz	Targeted SAR _{1g} (mW/g)	Measured SAR _{1g} (mW/g)	Deviation (%)
D-835V2, S/N: 406	Brain	2.375	2.53	<mark>6.1</mark>
System Validation Kit:	1900MHz	Targeted SAR _{1g} (mW/g)	Measured SAR _{1g} (mW/g)	Deviation (%)
D-1900V2, S/N: 502	Brain	9.925	9.83	- 0.95

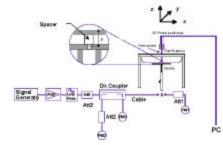




Figure 12.1 Dipole Validation Test Setup

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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	14.1 MEASUREMENT RESULTS (AMPS Right Head SAR – Touch)										
FREQU	JENCY	Modulation	Begin / End POWER [‡]		Device Test	Antenna	SAR				
MHz	Ch.	wouldton	(dl	3m)	Battery	Position	Position	(W/kg)			
824.04	0991	AMPS	24.74	24.81	Standard	Cheek / Touch	In	0.664			
824.04	0991	AMPS	24.73	24.77	Standard	Cheek / Touch	Out	0.910			
836.49	0383	AMPS	24.57	24.47	Standard	Cheek / Touch	In	0.513			
836.49	0383	AMPS	24.73	24.51	Standard	Cheek / Touch	Out	0.710			
848.97	0799	AMPS	24.64	24.56	Standard	Cheek / Touch	In	0.496			
848.97	0799	AMPS	24.52	24.62	Standard	Cheek / Touch	Out	0.684			
824.04	0991	AMPS	24.59	24.64	Extended	Cheek / Touch	In	0.631			
824.04	0991	AMPS	24.64	24.53	Extended	Cheek / Touch	Out	0.755			
ANSI / IEEE C95.1 1992 - SAFETY LIMIT							Brain				
		Spatial	1.6 W	//kg (mW/g)							

averaged over 1 gram

Uncontrolled Exposure/General Population

NOTES:

4.

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 readings. Standard & Extended Batteries are options.
 - [‡]Power Measured

SAR Measurement System

Phantom Configuration

- ⊠ Conducted DASY4 \mathbf{X}
 - - □ Left Head
- 5. SAR Configuration
- 6. Test Signal Call Mode
 - 🗵 Manu. Test Codes 🔲 Tissue parameters and temperatures are listed on the SAR plots.

I≍I Head

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

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

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- - □ EIRP

IDX Flat Phantom

ERP

- X Hand

Right Head

Base Station Simulator

- Body



Mixture Type: 835MHz Brain

14.2 MEASUREMENT RESULTS (AMPS Right Head SAR – Tilt)										
FREQUENCY Begin / End POWER [‡] Device Test Antenna SAR										
MHz	Ch.	wouldton	(dl	3m)	Battery	Position	Position	(W/kg)		
824.04	0991	AMPS	24.57	24.62	Standard	Ear / 15° Tilt	In	0.156		
824.04	0991	AMPS	24.63	24.71	Standard	Ear / 15° Tilt	Out	0.178		
		/ IEEE C95.1 199 Spatial rolled Exposure		Brain //kg (mW/g) ged 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].

- All modes of operation were investigated, and worst-case results are reported. 2.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
 - [‡]Power Measured
- SAR Measurement System 4.

Phantom Configuration

5. SAR Configuration

Left Head ⊠ Head

⊠ Conducted

DASY4

- Body
- **Right Head**

□ EIRP

- 6. Test Signal Call Mode
- 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, tile/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 14.2 Right Head SAR Test Setup -- Ear / Tilt Position --

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ERP IDX

Flat Phantom

 \mathbf{X}

- Hand
- Manu. Test Codes
 - **Base Station Simulator**



Mixture Type: 835MHz Brain

MEASUREMENT RESULTS (AMPS Left Head SAR - Touch) 14.3 FREQUENCY Begin / End POWER[‡] **Device Test** Antenna SAR Modulation Position Position (W/kg)MHz (dBm) Ch. Battery 824.04 0991 AMPS 24.69 24.80 Standard Cheek / Touch In 0.415 824.04 0991 AMPS 24.82 24.70 Standard Cheek / Touch Out 0.498 836.49 0383 AMPS 24.67 24.73 Standard Cheek / Touch In 0.513 836.49 AMPS 24.74 24.54 0383 Standard Cheek / Touch Out 0.751 848.97 0799 24.65 24.54 Standard Cheek / Touch AMPS In 0.293 848.97 0799 AMPS 24.60 Standard Cheek / Touch 24.64 Out 0.415 836.49 0383 AMPS 24.79 24.75 Extended Cheek / Touch In 0.395 836.49 0383 AMPS 24.84 24.91 Extended Cheek / Touch Out 0.587 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:

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 readings. Standard & Extended Batteries are options.
 - [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration
- ⊠ Conducted DASY4 \mathbf{X}
- I≍I Left Head
- ⊠ Head
- SAR Configuration 5.
- 6. Test Signal Call Mode
- 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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- ERP
- IDX

Hand

Right Head

□ EIRP

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



Mixture Type: 835MHz Brain

14.4	14.4 MEASUREMENT RESULTS (AMPS Left Head SAR – Tilt)									
FREQU	JENCY	Modulation	Beg	jin / End F	POWER [‡]	Device Test	Antenna	SAR		
MHz	Ch.	wouldton	(dBm)		Battery	Position	Position	(W/kg)		
836.49	0383	AMPS	24.72	24.62	Standard	Ear / 15° Tilt	In	0.139		
836.49	0383	AMPS	24.62	24.58	Standard	Ear / 15° Tilt	Out	0.162		
		/ IEEE C95.1 199 Spatial rolled Exposure	Peak		n	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].

⊠ Conducted

DASY4

- All modes of operation were investigated, and worst-case results are reported. 2.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
 - [‡]Power Measured
- SAR Measurement System 4.

Phantom Configuration

5. SAR Configuration

- I≍I Left Head ⊠ Head
- Flat Phantom Body

ERP

IDX

Right Head

6. Test Signal Call Mode

- Manu. Test Codes **Base Station Simulator**
- Hand

□ EIRP

- 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, tile/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 14.4 Left Head SAR Test Setup -- Ear / Tilt Position --

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Mixture Type: 835MHz Brain

14.5	14.5 MEASUREMENT RESULTS (CDMA Right Head SAR – Touch)									
FREQUENCY		Begin / End POWER [‡]			Device Test	Antenna	SAR			
MHz	Ch.	modulation	(dBm)		Battery	Position	Position	(W/kg)		
824.70	1013	CDMA	24.54	24.49	Standard	Cheek / Touch	In	0.565		
824.70	1013	CDMA	24.43	24.47	Standard	Cheek / Touch	Out	0.709		
		/ IEEE C95.1 199 Spatial rolled Exposure	Peak		n	Brain 1.6 W/kg (mW/g) 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].

⊠ Conducted

DASY4

□ Left Head

ERP

IDX

Body

Flat Phantom

Base Station Simulator

- 2. All modes of operation were investigated, and worst-case results are reported.
- Battery is fully charged for all readings. Standard & Extended Batteries are options. 3.
- [‡]Power Measured

4. SAR Measurement System

Phantom Configuration 5.

- SAR Configuration I≍I Head 🗵 Manu. Test Codes 🔲
- 6. Test Signal Call Mode
 - 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, tile/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

 \mathbf{X}

Right Head

Hand

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

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Mixture Type: 835MHz Brain

14.6	14.6 MEASUREMENT RESULTS (CDMA Right Head SAR - Tilt)										
FREQUENCY		Begin / End POWER [‡]			Device Test	Antenna	SAR				
MHz	Ch.	Wouldton	(dBm)		Battery	Position	Position	(W/kg)			
824.04	1013	CDMA	24.46	24.42	Standard	Ear / 15° Tilt	In	0.115			
824.04	1013	CDMA	24.44	24.45	Standard	Ear / 15° Tilt	Out	0.137			
	824.04 1013 CDMA 24.44 24.45 Standard ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Brain 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 1. typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

- All modes of operation were investigated, and worst-case results are reported. 2.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
- [‡]Power Measured
- SAR Measurement System 4.

Phantom Configuration

5. SAR Configuration Left Head ⊠ Head

⊠ Conducted

DASY4

Flat Phantom Body

IDX

ERP

 \mathbf{X} **Right Head**

□ EIRP

6. Test Signal Call Mode

- Manu. Test Codes
- Hand **Base Station Simulator**
- 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, tile/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 14.6 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)									
FREQUENCY		Begin / End POWER [‡]			Device Test	Antenna	SAR			
MHz	Ch.	modulation	(dBm)		Battery	Position	Position	(W/kg)		
836.49	383	CDMA	24.59	24.62	Standard	Cheek / Touch	In	0.443		
836.49	383	CDMA	24.63	24.68	Standard	Cheek / Touch	Out	0.618		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Brain 1.6 W/kg (mW/g) averaged over 1 gram			

NOTES:

7.

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

DASY4

□ Left Head

🗵 Manu. Test Codes 🔲

□ ERP

IDX

Body

Flat Phantom

Base Station Simulator

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
- [‡]Power Measured
- 4. SAR Measurement System
- Phantom Configuration5. SAR Configuration
 - SAR Configuration 🗵 Head
- 6. Test Signal Call Mode
 - Tissue parameters and temperatures are listed on 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, tile/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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 \mathbf{X}

EIRP

Hand

Right Head

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

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Mixture Type: 835MHz Brain

14.8	14.8 MEASUREMENT RESULTS (CDMA Left Head SAR - Tilt)									
FREQU	JENCY	NCY Modulation		jin / End F	POWER [‡]	Device Test Position	Antenna Position	SAR (W/kg)		
MHz	Ch.	Wouldton	(dBm)		Battery					
836.49	383	CDMA	24.51	24.58	Standard	Ear / 15° Tilt	In	0.118		
836.49	383	CDMA	24.49	24.52	Standard	Ear / 15° Tilt	Out	0.156		
		/ IEEE C95.1 199 Spatial rolled Exposure	Peak		n	Brain 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 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 & Extended Batteries are options.
- [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration

Left Head ⊠ Head

⊠ Conducted

DASY4

IDX Flat Phantom

ERP

 \mathbf{X} **Right Head**

□ EIRP

5. SAR Configuration 6. Test Signal Call Mode

- Manu. Test Codes
- Body Hand **Base Station Simulator**
- 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, tile/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 Right Head SAR Test Setup -- Ear / Tilt Position --

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Mixture Type: 1900MHz Brain

14.9	14.9 MEASUREMENT RESULTS (PCS CDMA Right Head SAR – Touch)										
FREQU	ENCY	Modulation	Begin / End POWER [‡]		Device Test	Antenna	SAR				
MHz	Ch.	wouldton	(dBm)		Battery	Position	Position	(W/kg)			
1851.25	0025	PCS CDMA	23.98	24.00	Standard	Cheek / Touch	In	0.745			
1851.25	0025	PCS CDMA	24.00	24.01	Standard	Cheek / Touch	Out	0.133			
1880.00	0600	PCS CDMA	24.19	24.17	Standard	Cheek / Touch	In	1.160			
1880.00	0600	PCS CDMA	24.14	24.08	Standard	Cheek / Touch	Out	0.260			
1908.75	1175	PCS CDMA	24.00	24.01	Standard	Cheek / Touch	In	0.614			
1908.75	1175	PCS CDMA	24.00	24.04	Standard	Cheek / Touch	Out	0.203			
1880.00	0600	PCS CDMA	24.13	24.13	Extended	Cheek / Touch	In	1.080			
1880.00	0600	PCS CDMA	24.14	24.13	Extended	Cheek / Touch	Out	0.220			
·	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak						Brain 1.6 W/kg (mW/g)				

Uncontrolled Exposure/General Population

NOTES:

4.

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].

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

3	Battery is full	v charged for all	readings	Standard & Extended Batteries are options.
J.	Dattery is run	y charged for an	reaunigs.	Standard & Externated Datternes are options.

[‡]Power Measured

SAR Measurement System

Phantom Configuration

- ⊠ Conducted DASY4 X

 - □ Left Head I≍I Head

- 5. SAR Configuration
- 6. Test Signal Call Mode

Manu. Test Codes Tissue parameters and temperatures are listed on the SAR plots.

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

Alfred Cirwithian Vice President Engineering



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

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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SAR-230609273.AEZ	June 8-12, 2003	Tri-Mode Dual-Band	AEZSCP-54H	

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averaged over 1 gram

Flat Phantom

X Hand

□ EIRP

Right Head

Base Station Simulator

Body

ERP

IDX



Mixture Type: 1900MHz Brain

14.10	14.10 MEASUREMENT RESULTS (PCS CDMA Right Head SAR – Tilt)									
FREQUENCY Begin / End POWER [‡]						Device Test Antenna SAR	SAR			
MHz	Ch.	modulution	(dBm)		Battery	Position	Position	(W/kg)		
1880.00	0600	PCS CDMA	24.14	24.16	Standard	Ear / 15° Tilt	In	0.124		
1880.00	0600	PCS CDMA	24.16	24.19	Standard	Ear / 15° Tilt	Out	0.098		
		/ IEEE C95.1 199 Spatial rolled Exposure		Brain //kg (mW/g) ged over 1 gram						

NOTES:

6.

7.

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

DASY4

□ Left Head

□ ERP

IDX

Body

Flat Phantom

Base Station Simulator

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
- [‡]Power Measured

4. SAR Measurement System

Phantom Configuration5. SAR Configuration

- SAR Configuration IX Head
- Test Signal Call Mode 🛛 Manu. Test Codes 🗖
- Tissue parameters and temperatures are listed on 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, tile/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).

Alfred Cirwithian Vice President Engineering



□ EIRP

 \mathbf{X}

Right Head

Hand

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

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 27 of 41
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Mixture Type: 1900MHz Brain

14.11	14.11 MEASUREMENT RESULTS (PCS CDMA Left Head SAR – Touch)									
FREQUENCY		Modulation	Begin / End POWER [‡]			Device Test	Antenna	SAR		
MHz	Ch.	Wouldton	(dBm)		Battery	Position	Position	(W/kg)		
1851.25	0025	PCS CDMA	24.18	24.17	Standard	Cheek / Touch	In	0.787		
1851.25	0025	PCS CDMA	24.16	24.19	Standard	Cheek / Touch	Out	0.174		
1880.00	0600	PCS CDMA	24.15	24.16	Standard	Cheek / Touch	In	0.888		
1880.00	0600	PCS CDMA	24.16	24.18	Standard	Cheek / Touch	Out	0.218		
1908.75	1175	PCS CDMA	24.10	24.09	Standard	Cheek / Touch	In	0.547		
1908.75	1175	PCS CDMA	24.10	24.03	Standard	Cheek / Touch	Out	0.182		
1851.25	0025	PCS CDMA	24.09	24.12	Extended	Cheek / Touch	In	0.782		
1851.25	0025	PCS CDMA	24.20	24.19	Extended	Cheek / Touch	Out	0.171		
	ANSI	/ IEEE C95.1 199		Brain						

Spatial Peak Uncontrolled Exposure/General Population Brain 1.6 W/kg (mW/g)

EIRP

Hand

Right Head

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].

⊠ Conducted

DASY4

☑ Left Head

□ ERP

IDX

Body

Flat Phantom

Base Station Simulator

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

I Head

 \mathbf{X}

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

PCTESTÔ SAR REPORT		FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 28 of 41
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Mixture Type: 1900MHz Brain

14.12 MEASUREMENT RESULTS (PCS CDMA Left Head SAR – Tilt)									
FREQU	ENCY	Modulation	Beg	jin / End F	POWER [‡]	Device Test	Antenna	SAR	
MHz	Ch.	wouldton	(dBm) Ba		Battery	Position	Position	(W/kg)	
1880.00	0600	CDMA	24.18	24.17	Standard	Ear / 15° Tilt	In	0.106	
1880.00	0600	CDMA	24.20	24.17	Standard	Ear / 15° Tilt	Out	0.107	
		/ IEEE C95.1 19 Spatial rolled Exposure		Brain //kg (mW/g) ged 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].

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

I≍I Left Head ⊠ Head

⊠ Conducted

DASY4

Flat Phantom Body

ERP

IDX

Right Head Hand

□ EIRP

6. Test Signal Call Mode

- Manu. Test Codes
 - **Base Station Simulator**
- 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, tile/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 14.12 Left Head SAR Test Setup -- Ear / Tilt Position --

PCTESTÔ SAR REPORT	FCC CERTIFICATION		SANYO	Reviewed by: Quality Manager
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Mixture Type: 835MHz Muscle

14.13	MEAS	UREMENT	RESU	LTS (A	MPS Bod	y SAR w/o Ho	olster)	
FREQU	JENCY	Modulation	Begin / End POWER [‡]			Separation	Antenna	SAR
MHz	Ch.	Modulation	(dBm)		Battery	Distance (cm) ¹¹	Position	(W/kg)
824.04	0991	AMPS	24.63	24.50	Standard	1.9 [w/o Holster]	In	0.340
824.04	0991	AMPS	24.65	24.62	Standard	1.9 [w/o Holster]	Out	0.543
836.49	0383	AMPS	24.61	24.57	Standard	1.9 [w/o Holster]	In	0.369
836.49	0383	AMPS	24.80	24.70	Standard	1.9 [w/o Holster]	Out	0.539
848.97	0799	AMPS	24.72	24.65	Standard	1.9 [w/o Holster]	In	0.386
848.97	0799	AMPS	24.66	24.54	Standard	1.9 [w/o Holster]	Out	0.519
836.49	0383	AMPS	24.62	24.59	Extended	1.9 [w/o Holster]	Out	0.529
	ANSI	/ IEEE C95.1 199		Muscle				
		Spatial		/ /kg (mW/g) ed 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 typical configuration. 1. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

⊠ Conducted

DASY4

□ With Holster

Manu. Test Codes

□ Left Head

□ Head

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
- [‡]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 $15.1 \text{ cm.} \pm 0.1$

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

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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IDX

ERP

 \mathbf{X}

- IX Flat Phantom Body
- Hand

EIRP

Right Head

- **Base Station Simulator**
- ☑ Without Holster



Mixture Type: 835MHz Muscle

14.14	14.14 MEASUREMENT RESULTS (CDMA Body SAR w/o Holster)									
FREQU	JENCY	Modulation	Beg	jin / End POWER [‡]		Separation Distance (cm) ^{##}	Antenna Position	SAR (W/kg)		
MHz	Ch.	modulation	(dBm)		Battery					
824.70	1013	CDMA	24.62	24.51	Standard	1.9 [w/o Holster]	In	0.318		
824.70	1013	CDMA	24.57	24.48	Standard	1.9 [w/o Holster]	Out	0.435		
		/ IEEE C95.1 199 Spatial rolled Exposure	1.6 W	/luscle / /kg (mW/g) ed 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].

Conducted

DASY4

Head

□ With Holster

Left Head

Manu. Test Codes

- 2. All modes of operation were investigated, and worst-case results are reported.
- Battery is fully charged for all readings. Standard & Extended Batteries are options. 3.

 \mathbf{X}

 \mathbf{X}

X

- [‡]Power Measured
- 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 14.14 Body SAR Test Setup -- w/o Holster --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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- IDX
 - $|\mathbf{X}|$ \mathbf{X} Body

ERP

- Base Station Simulator
- ☑ Without Holster
- Flat Phantom
- **Right Head**

□ EIRP

Hand



Mixture Type: 1900MHz Muscle

14.15	MEAS	UREMENT	RESU	LTS (P	CS CDM	A Body SAR w	/o Holst	er)
FREQU	IENCY	Modulation	Beg	jin / End F	POWER [‡]	Separation	Antenna	SAR
MHz	Ch.	Modulation	(dł	3m)	Battery	Distance (cm) ^{‡‡}	Position	(W/kg)
1851.25	0025	PCS CDMA	24.26	24.33	Standard	1.9 [w/o Holster]	In	0.532
1851.25	0025	PCS CDMA	24.20	24.37	Standard	1.9 [w/o Holster]	Out	0.690
1880.00	0600	PCS CDMA	24.19	24.30	Standard	1.9 [w/o Holster]	In	0.577
1880.00	0600	PCS CDMA	24.29	24.30	Standard	1.9 [w/o Holster]	Out	0.881
1908.75	1175	PCS CDMA	24.24	24.31	Standard	1.9 [w/o Holster]	ln	0.530
1908.75	1175	PCS CDMA	24.30	24.28	Standard	1.9 [w/o Holster]	Out	0.622
1880.00	0600	PCS CDMA	24.20	24.25	Extended	1.9 [w/o Holster]	Out	0.861
	ANSI	/ IEEE C95.1 199	92 - SAFE	TY LIMIT		-	Auscle	
		Spatial	Peak				/kg (mW/g) ed 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].

⊠ Conducted

DASY4

□ With Holster

🗵 Manu. Test Codes 🔲

□ Left Head

□ Head

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard & Extended Batteries are options.
- [‡]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 14.15 Body SAR Test Setup -- w/o Holster --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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 \mathbf{X}

ERP

Body

- IX Flat Phantom
- Right HeadHand

EIRP

- Base Station Simulator
- ☑ Without Holster



Mixture Type: 835MHz Brain

14.16 MEASUREMENT RESULTS (AMPS/FACE/ Push To Talk Mode)(Flip Open) FREQUENCY Begin / End POWER[‡] Antenna SAR Separation Modulation Distance (cm) Position (W/kg) MHz Ch. (dBm) Battery 824.04 0991 AMPS 24.64 24.71 Standard 2.5 cm 0.198 In 824.04 0991 AMPS 24.72 24.69 Standard 2.5 cm Out 0.216 836.49 0383 AMPS 24.62 24.68 Standard 2.5 cm In 0.172 836.49 0383 AMPS 24.68 24.71 Standard 2.5 cm Out 0.136 848.97 0799 AMPS 24.67 24.61 Standard 2.5 cm In 0.187 848.97 0799 AMPS 24.65 24.59 Standard 2.5 cm Out 0.133 ANSI / IEEE C95.1 1992 - SAFETY LIMIT Brain 1.6 W/kg (mW/g) **Spatial Peak** averaged over 1 gram **Uncontrolled Exposure/General Population**

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.
- Battery is fully charged for all readings. Standard & Extended Batteries are options.
- 4. SAR Measurement System Phantom Configuration
- SAR Configuration
- 6. Test Signal Call Mode

- 3.
 - [‡]Power Measured
- 5.

□ Head

□ Left Head

⊠ Conducted

DASY4

- 🖾 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 14.16 AMPS Face SAR Test Setup -- Flip Open Position --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 33 of 41
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- IX Flat Phantom
- **Base Station Simulator**

ERP

I≺ Face

IDX

Right Head

Hand

EIRP



Mixture Type: 835MHz Brain

14.17	MEAS	UREMENT	RESUL	.TS (AN	IPS/FACE	/ Push To Tall	(Mode)	Flip Close)
FREQU	IENCY	Modulation	Begin / End POW		n / End POWER [±] Separation		Antenna	SAR
MHz	Ch.	Modulation	(dł	3m)	Battery	Distance (cm)	Position	(W/kg)
824.04	0991	AMPS	24.53	24.62	Standard	2.5 cm	In	0.113
824.04	0991	AMPS	24.64	24.61	Standard	2.5 cm	Out	0.259
836.49	0383	AMPS	24.59	24.61	Standard	2.5 cm	In	0.125
836.49	0383	AMPS	24.61	24.54	Standard	2.5 cm	Out	0.243
848.97	0799	AMPS	24.56	24.62	Standard	2.5 cm	In	0118
848.97	0799	AMPS	24.63	24.59	Standard	2.5 cm	Out	0.216
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain	
	Spatial Peak Uncontrolled Exposure/General Population						V/kg (mW/g) aged 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].

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

3.	Battery is fully charged for all readings.	Standar	d & Extended	Batteries are	options.
	[‡] Power Measured	X	Conducted		ERP

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

- ⊠ DASY4 Left Head
- Head
- X Manu. Test Codes

IDX

Flat Phantom

 \mathbf{X}

- Face
- **Base Station Simulator**

□ EIRP

Right Head

Hand

- 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 14.17 AMPS Face SAR Test Setup -- Flip Close Position --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 34 of 41
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Mixture Type: 835MHz Brain

14.18	MEAS	UREMENT	RESUL	TS (CD	MA/FAC	E/ Push To Ta	k Mode)	(Flip Open)
FREQUENCY		Modulation	Beg	jin / End F	POWER [‡]	Separation	Antenna	SAR
MHz	Ch.	Wouldton	(dl	3m)	Battery	Distance (cm)	Position	(W/kg)
824.70	1013	CDMA	24.53	24.58	Standard	2.5 cm	In	0.206
824.70	1013	CDMA	24.58	24.47	Standard	2.5 cm	Out	0.169
836.49	383	CDMA	24.47	24.55	Standard	2.5 cm	In	0.212
836.49	383	CDMA	24.56	24.52	Standard	2.5 cm	Out	0.178
848.31	777	CDMA	24.51	24.55	Standard	2.5 cm	In	0.194
848.31	777	CDMA	24.55	24.48	Standard	2.5 cm	Out	0.157
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain	
		Spatial	Peak				W/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].

⊠ Conducted

Head

Left Head

DASY4

ERP

IDX

Flat Phantom

Base Station Simulator

 \mathbf{X}

 \mathbf{X} Face

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

2	D - H	· · · · · · · · · · · · · · · · · · ·	Standard & Extended Batteries are options.	
~	$Ram \Delta r v r c m n v$	charded for all readings	x_{1}	
J.			Junuaru & Exicitucu Dalleries are 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.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

Alfred Cirwithian Vice President Engineering



□ EIRP

Right Head

Hand

Figure 14.18 CDMA Face SAR Test Setup -- Flip Open Position --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 35 of 41
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Mixture Type: 835MHz Brain

14.19	MEAS	UREMENT	RESUL	TS (CD	MA/FAC	E/ Push To Ta	lk Mode)	(Flip Close)
FREQUENCY		Modulation	Beg	in / End P	POWER [‡]	Separation	Antenna	SAR
MHz	Ch.	Modulation	(dl	3m)	Battery	Distance (cm)	Position	(W/kg)
824.70	1013	CDMA	24.61	24.69	Standard	2.5 cm	In	0.129
824.70	1013	CDMA	24.69	24.72	Standard	2.5 cm	Out	0.242
836.49	383	CDMA	24.57	24.66	Standard	2.5 cm	In	0.139
836.49	383	CDMA	24.68	24.54	Standard	2.5 cm	Out	0.261
848.31	777	CDMA	24.62	24.67	Standard	2.5 cm	In	0.126
848.31	777	CDMA	24.59	24.53	Standard	2.5 cm	Out	0.233
	ANSI	/ IEEE C95.1 19	92 - SAFE	ΤΥ LIMIT			Brain	
		Spatial	Peak				W/kg (mW/g)
	Uncont	rolled Exposure	/General	Populatio	n	aver	aged 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 & Extended Batteries are options.
----	--------------------------------------------	--------------------------------------------

[‡]Power Measured
4. SAR Measurement System Phantom Configuration

- 5. SAR Configuration
- 6. Test Signal Call Mode
- 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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Figure 14.19 CDMA Face SAR Test Setup -- Flip Close Position --

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ConductedDASY4

- Left Head
- □ Head

- 🗵 Manu. Test Codes
- IX Flat Phantom

IDX

Face

□ ERP

 \mathbf{X}

Right HeadHand

□ EIRP

Base Station Simulator



SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Brain

14.20 MEASUREMENT RESULTS (PCS CDMA Push To Talk Mode)(Flip Open)								
FREQUENCY		Modulation	Beg	Begin / End POWER [‡]		Separation	Antenna	SAR
MHz	Ch.	wouldton	(dl	Bm)	Battery	Distance (cm)	Position	(W/kg)
1851.25	0025	PCS CDMA	24.22	24.19	Standard	2.5 cm	In	0.185
1851.25	0025	PCS CDMA	24.26	24.15	Standard	2.5 cm	Out	0.069
1880.00	0600	PCS CDMA	24.19	24.27	Standard	2.5 cm	In	0.191
1880.00	0600	PCS CDMA	24.29	24.25	Standard	2.5 cm	Out	0.077
1908.75	1175	PCS CDMA	24.26	24.18	Standard	2.5 cm	In	0.189
1908.75	1175	PCS CDMA	24.21	24.16	Standard	2.5 cm	Out	0.071
ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain		
	Spatial Peak						V/kg (mW/g) ged over 1 gram	
	Uncontrolled Exposure/General Population						gea over i 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].

⊠ 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 read	dings. Standard & Extended Batter	ies are options.

- [‡]Power Measured
- SAR Measurement System 4. Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode
- 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 14.20 PCS CDMA Face SAR Test Setup -- Flip Open Position --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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ERP

- ☑ Flat Phantom
- **Right Head** Hand

□ EIRP

- Manu. Test Codes Base Station Simulator
- D IDX

- ⊠ Face



SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Brain

14.21 MEASUREMENT RESULTS (PCS CDMA Push To Talk Mode)(Flip Close)								
FREQUENCY		Begin / End POWER [‡]		Separation	Antenna	SAR		
MHz	Ch.	Modulation	(dł	3m)	Battery	Distance (cm)	Position	(W/kg)
1851.25	25	PCS CDMA	24.20	24.28	Standard	2.5 cm	In	0.137
1851.25	25	PCS CDMA	24.24	24.16	Standard	2.5 cm	Out	0.174
1880.00	0600	PCS CDMA	24.21	24.35	Standard	2.5 cm	In	0.193
1880.00	0600	PCS CDMA	24.37	24.29	Standard	2.5 cm	Out	0.154
1908.75	1175	PCS CDMA	24.26	24.18	Standard	2.5 cm	In	0.149
1908.75	1175	PCS CDMA	24.21	24.15	Standard	2.5 cm	Out	0.166
ANSI / IEEE C95.1 1992 - SAFETY LIMIT						Brain		
	Spatial Peak Uncontrolled Exposure/General Population						//kg (mW/g)	
						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

DASY4

□ Left Head

Head

Manu. Test Codes

ERP

Face

☑ Flat Phantom

Base Station Simulator

 \mathbf{X}

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

- [‡]Power Measured
- 4. SAR Measurement System Phantom Configuration
- 5. SAR Configuration
- 6. Test Signal Call Mode
- 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 14.21 PCS CDMA Face SAR Test Setup -- Flip Close Position --

PCTESTÔ SAR REPORT	PCTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
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SAR TEST EQUIPMENT 15.

Equipment Calibration

Table 15.1 Test Equipment Calibration

EQUIPMENT SPECIFICATIONS				
Туре	Calibration Date	Serial Number		
Stäubli Robot RX60L	February 2003	599131-01		
Stäubli Robot Controller	February 2003	PCT592		
Stäubli Teach Pendant (Joystick)	February 2003	3323-00161		
Micron Computer, 450 MHz Pentium III, Windows NT	February 2003	PCT577		
SPEAG EDC3	February 2003	321		
SPEAG DAE3	February 2003	330		
SPEAG E-Field Probe ET3DV6	September 2002	1560		
SPEAG Dummy Probe	February 2003	PCT583		
SPEAG SAM Twin Phantom V4.0	February 2003	PCT666		
SPEAG Light Alignment Sensor	February 2003	205		
PCTEST Validation Dipole D300V2	September 2002	PCT301		
SPEAG Validation Dipole D835V2	February 2003	PCT512		
SPEAG Validation Dipole D1900V2	February 2003	PCT613		
Brain Equivalent Matter (300MHz)	June 2003	PCTBEM601		
Brain Equivalent Matter (835MHz)	June 2003	PCTBEM101		
Brain Equivalent Matter (1900MHz)	June 2003	PCTBEM301		
Muscle Equivalent Matter (300MHz)	June 2003	PCTMEM701		
Muscle Equivalent Matter (835MHz)	June 2003	PCTMEM201		
Muscle Equivalent Matter (1900MHz)	June 2003	PCTMEM401		
Microwave Amp. Model: 5S1G4, (800MHz - 4.2GHz)	January 2003	22332		
Gigatronics 8651A Power Meter	January 2003	1835299		
HP-8648D (9kHz ~ 4GHz) Signal Generator	January 2003	PCT530		
Amplifier Research 5S1G4 Power Amp	January 2003	PCT540		
HP-8753E (30kHz ~ 3GHz) Network Analyzer	January 2003	PCT552		
HP85070B Dielectric Probe Kit	January 2003	PCT501		
Ambient Noise/Reflection, etc. <12mW/kg/<3%of SAR	January 2003	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.

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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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APPENDIX A: DIPOLE VALIDATION

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 835 MHz; Type: D835V2; Serial: D835V2 - SN:406 Program: 835MHz. Dipole Validation - 1560

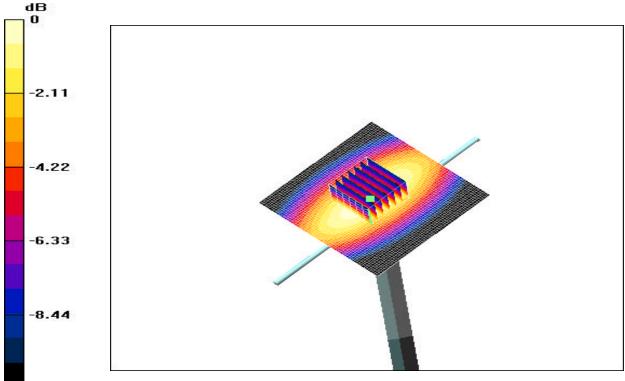
Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1 Medium: HSL 835 ($\sigma = 0.93$ mho/m, $\varepsilon_r = 40.78$, $\rho = 1000$ kg/m³) Phantom section: Flat Section

Test Date: 06-09-2003; Ambient Temp: 22.9°C; Tissue Temp: 20.3°C

Probe: ET3DV6 - SN1560; ConvF(6.9, 6.9, 6.9); Calibrated: 9/27/2002 Sensor-Surface: 4mm (Mechanical And Optical Surface Detection) Electronics: DAE3 SN330; Calibrated: 12/1/2002 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197 Measurement SW: DASY4, V4.1 Build 33; Postprocessing SW: SEMCAD, V1.6 Build 115

validation/Area Scan (61x61x1): Measurement grid: dx=15mm, dy=15mm Reference Value = 59.4 V/m

validation/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Peak SAR (extrapolated) = 3.72W/kg
SAR(1 g) = 2.53 mW/g; SAR(10 g) = 1.64 mW/g
Reference Value = 59.6 V/m



-10.5

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 1900 MHz; Type: D1900V2; Serial: D1900V2 - SN:502 Program: 1900MHz Dipole Validation - 1560

Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1 Medium: 1900 Brain ($\sigma = 1.38$ mho/m, $\varepsilon_r = 39.1$, $\rho = 1000$ kg/m³) Phantom section: Flat Section

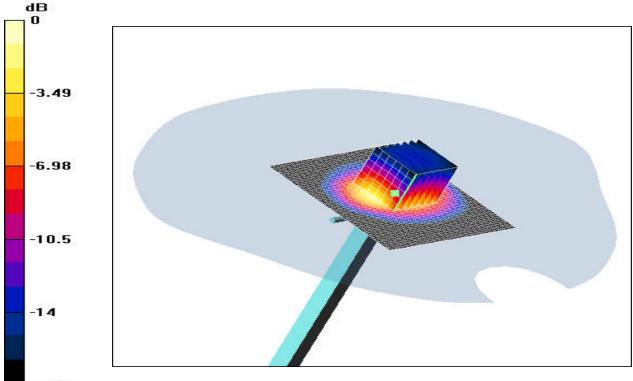
Test Date: 06-10-2003; Ambient Temp: 22.7°C; Tissue Temp: 20.1°C

Probe: ET3DV6 - SN1560; ConvF(5.4, 5.4, 5.4); Calibrated: 9/27/2002 Sensor-Surface: 4mm (Mechanical And Optical Surface Detection) Electronics: DAE3 SN330; Calibrated: 12/1/2002 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197 Measurement SW: DASY4, V4.1 Build 33; Postprocessing SW: SEMCAD, V1.6 Build 115

1900MHz Dipole Validation - 1560/Area Scan (61x61x1): Measurement grid: dx=15mm, dy=15mm

1900MHz Dipole Validation - 1560/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm,

dy=5mm, dz=5mm Peak SAR (extrapolated) = 17.5 W/kg SAR(1 g) = 9.83 mW/g; SAR(10 g) = 5.05 mW/g Reference Value = 93.8 V/m



-17.5

APPENDIX B: PROBE CALIBRATION

Schmid & Partner **Engineering AG**

Zeughausstrasse 43, 8004 Zurich, Switzerland, Phone +41 1 245 97 00, Fax +41 1 245 97 79

Calibration Certificate

Dosimetric E-Field Probe

Type: ET3DV6 Serial Number: 1560 Place of Calibration: Zurich Date of Calibration: September 27, 2002 Calibration Interval: 12 months

Schmid & Partner Engineering AG hereby certifies, that this device has been calibrated on the date indicated above. The calibration was performed in accordance with specifications and procedures of Schmid & Partner Engineering AG.

Wherever applicable, the standards used in the calibration process are traceable to international standards. In all other cases the standards of the Laboratory for EMF and Microwave Electronics at the Swiss Federal Institute of Technology (ETH) in Zurich, Switzerland have been applied.

Calibrated by:

N.Veller Alconic Vety =

Approved by:

Zeughausstrasse 43, 8004 Zurich, Switzerland, Telephone +41 1 245 97 00, Fax +41 1 245 97 79

Probe ET3DV6

SN:1560

Manufactured: Last calibration: Recalibrated: December 1, 2000 February 20, 2001 September 27, 2002

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

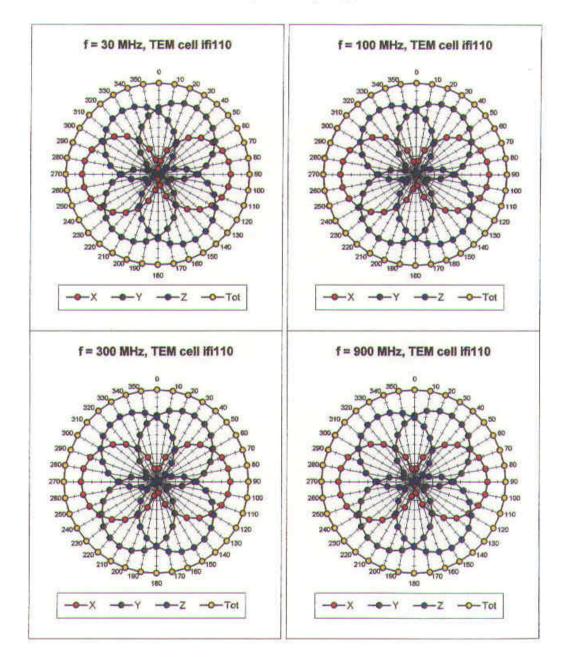
DASY - Parameters of Probe: ET3DV6 SN:1560

Sensi	tivity in Free S	pace	Diode Compression
	NormX	1.48 μV/(V/m) ²	DCP X 93 mV
	NormY	1.50 μV/(V/m) ²	DCP Y 93 mV
	NormZ	1.42 μV/(V/m) ²	DCP Z 93 mV
Sensi	tivity in Tissue	Simulating Liquid	
Head	835 MH	z ε _r = 41.5 ± 5	% σ = 0.90 ± 5% mho/m
Head	900 MH	$z = \epsilon_r = 41.5 \pm 5^{\circ}$	% $\sigma = 0.97 \pm 5\%$ mho/m
	ConvF X	6.9 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	6.9 ± 9.5% (k=2)	Alpha 0.60
	ConvF Z	6.9 ± 9.5% (k=2)	Depth 1.69
Head Head	1900 MH 1800 MH		
	ConvF X	5.4 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	5.4 ± 9.5% (k=2)	Alpha 0.49
	ConvF Z	5.4 ± 9.5% (k=2)	Depth 2.36

Boundary Effect

Head	83	5 MHz	Typical SAR gradier	nt: 5 % per i	nm	
	Probe Tip t	o Boundary			1 mm	2 mm
	SAR _{be} [%]	Without Co	prrection Algorithm		7.3	3.7
	SAR _{be} [%]	With Corre	ection Algorithm		0.0	0.2
Head	1900) MHz	Typical SAR gradier	nt: 10 % per	mm	
	Probe Tip t	o Boundary			1 mm	2 mm
	SAR _{be} [%]	Without Co	prrection Algorithm		11.1	7.6
	SAR _{be} [%]	With Corre	ection Algorithm		0.2	0.4
Sensor	Offset					
	Probe Tip t	o Sensor Ce	enter	2.7		mm

•		
Optical Surface Detection	1.3 ± 0.2	mm

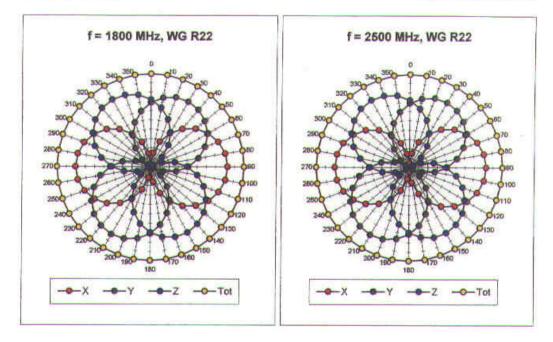


Receiving Pattern (ϕ), $\theta = 0^{\circ}$

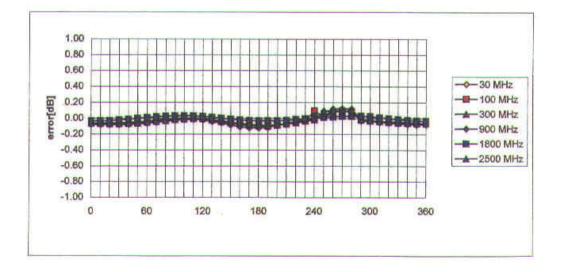
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ET3DV6 SN:1560

September 27, 2002



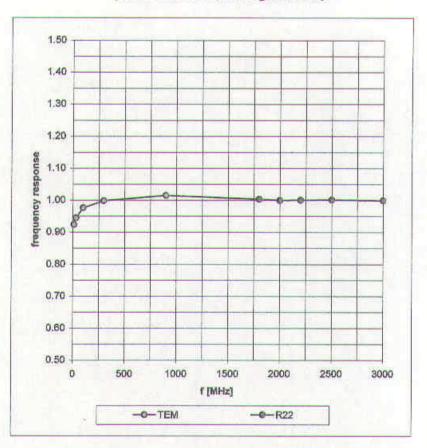
Isotropy Error (ϕ), $\theta = 0^{\circ}$

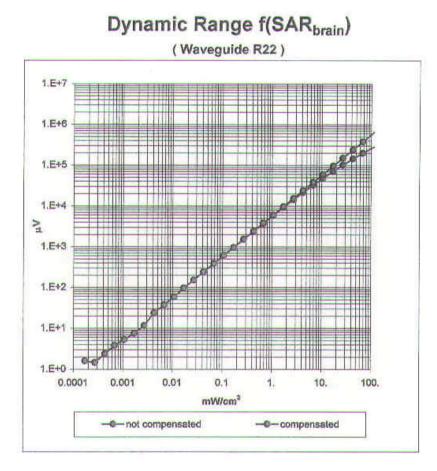


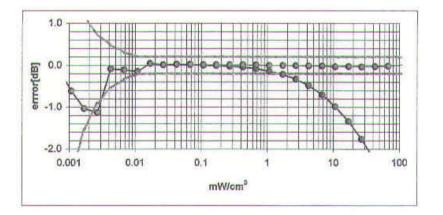
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Frequency Response of E-Field

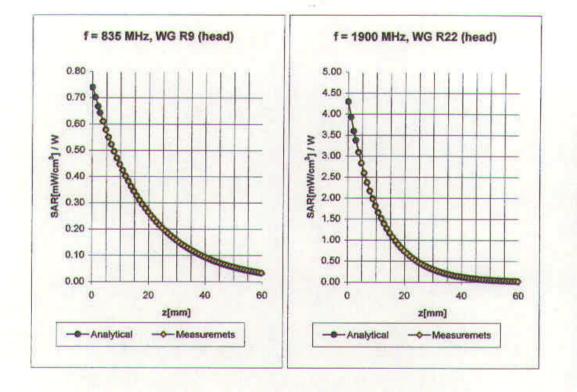
(TEM-Cell:ifi110, Waveguide R22)







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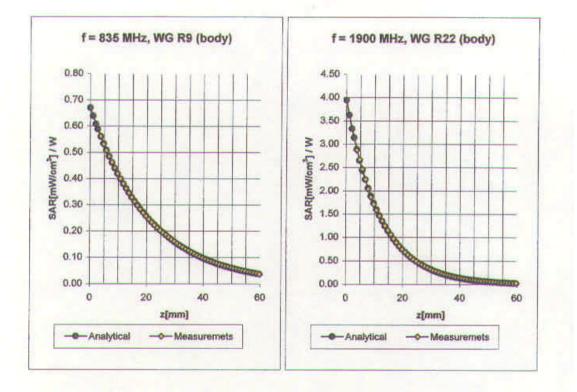


Conversion Factor Assessment

Head	835 MHz		$e_{r} = 41.5 \pm 5\%$	o = 0.90 ± 5% n	nho/m
Head	900 MHz		$\epsilon_{r} = 41.5 \pm 5\%$	σ = 0.97 ± 5% π	nho/m
	ConvF X	6.9	± 9.5% (k=2)	Boundary et	ffect
	ConvF Y	6.9	± 9.5% (k=2)	Alpha	0.60
	ConvF Z	6.9	± 9.5% (k=2)	Depth	1.69

Head	1900 MHz	$\varepsilon_r = 40.0 \pm 5\%$	σ = 1.40 ± 5% mho/m
Head	1800 MHz	$\varepsilon_{\tau} = 40.0 \pm 5\%$	σ = 1.40 ± 5% mho/m
	ConvF X	5.4 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	5.4 ± 9.5% (k=2)	Alpha 0.49
	ConvF Z	5.4 ± 9.5% (k=2)	Depth 2.36

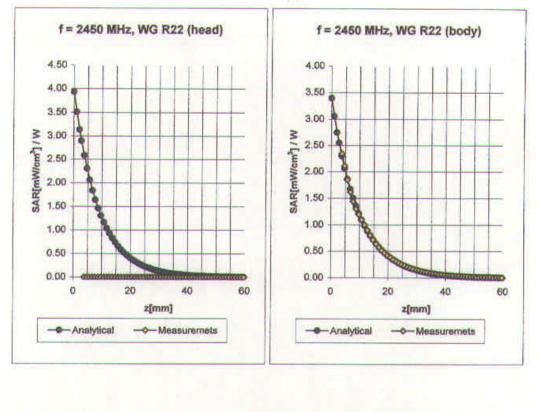
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Conversion Factor Assessment

Body	835 MHz	er = 55.2 ± 5%	σ = 0.97 ± 5% mho/m
Body	900 MHz	$\epsilon_r = 55.0 \pm 5\%$	σ = 1.05 ± 5% mho/m
	ConvF X	6.6 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	6.6 ± 9.5% (k=2)	Alpha 0.33
	ConvF Z	6.6 ± 9.5% (k=2)	Depth 2.60
Body	1900 MHz	s, = 53.3 ± 5%	$\sigma = 1.52 \pm 5\%$ mho/m

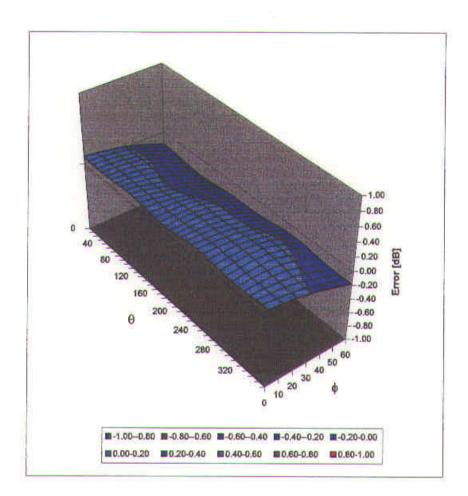
Body	1800 MHz		$\varepsilon_{t} = 53.3 \pm 5\%$	σ = 1.52 ± 5% m	ho/m
	ConvF X	4.9	± 9.5% (k=2)	Boundary eff	ect:
	ConvF Y	4.9	± 9.5% (k=2)	Alpha	0.64
	ConvF Z	4.9	± 9.5% (k=2)	Depth	2.24



Conversion Factor Assessment

2450	Head	MHz	$\varepsilon_r = 39.2 \pm 5\%$	σ = 1.80 ± 5% mh	o/m
	ConvF X	4.	9 ± 8.9% (k=2)	Boundary effe	st:
	ConvF Y	4.	9 ± 8.9% (k=2)	Alpha	1.00
	ConvF Z	4.	9 ± 8.9% (k=2)	Depth	1.60
2450	Body	MHz	$\varepsilon_r = 52.7 \pm 5\%$	σ = 1.95 ± 5% mho	oʻm
	ConvF X	4.	4 ± 8.9% (k=2)	Boundary effect	rt:
	ConvF Y	4.	4 ± 8.9% (k=2)	Alpha	1.00
	ConvF Z	4	4 ± 8.9% (k=2)	Depth	1.50

Deviation from Isotropy in HSL Error (θ, φ), f = 900 MHz



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Additional Conversion Factors
for Dosimetric E-Field ProbeType:ET3DV6Serial Number:1560Place of Assessment:ZurichDate of Assessment:September 30, 2002Probe Calibration Date:September 27, 2002

Schmid & Partner Engineering AG hereby certifies that conversion factor(s) of this probe have been evaluated on the date indicated above. The assessment was performed using the FDTD numerical code SEMCAD of Schmid & Partner Engineering AG. Since the evaluation is coupled with measured conversion factors, it has to be recalculated yearly, i.e., following the re-calibration schedule of the probe. The uncertainty of the numerical assessment is based on the extrapolation from measured value at 900 MHz or at 1800 MHz.

Assessed by:

Polenie Vata

Dosimetric E-Field Probe ET3DV6 SN: 1560

Conversion factor (\pm standard deviation)

150 MHz	ConvF	8.6± 8%	e _r = 52.3 ± 5% s = 0.76 ± 5% mho/m (Head tissue)
150 MHz	ConvF	8.5± 8%	e _r = 61.9 ± 5% s = 0.80 ± 5% mho/m (Body tissue)
300 MHz	ConvF	7.4± 8%	e _r = 45.3 ± 5% s = 0.87 ± 5% mho/m (Head tissue)
450 MHz	ConvF	7.9±8%	e _r = 45.1 ± 5% s = 0.85 ± 5% mho/m (Head tissue)
450 MHz	ConvF	7.7±8%	e _r = 56.7 ± 5% s = 0.94 ± 5% mho/m (Body tissue)