### 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)





**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: April 4-5, 2006 Test Report S/N: 0604040230

Test Site: PCTEST Lab, Columbia MD

FCC ID: AEZSCP-66H

APPLICANT: SANYO ELECTRIC CO., LTD.

Tri-Mode Dual-Band Analog/PCS Phone (AMPS/CDMA) with Bluetooth **EUT Type:** 

Tx Frequency: 824.04 - 848.97 MHz (AMPS) / 824.70 - 848.31 MHz (CDMA)

1851.25 - 1908.75 MHz (PCS CD MA)

**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: 0.401 W ERP AMPS (26.029 dBm) / 24.5 dBm Conducted

> 0.355 W ERP CDMA (25.503 dBm) / 24.0 dBm Conducted 0.421 W EIRP PCS CDMA (26.231dBm) / 23.5 dBm Conducted

0.769 W/kg AMPS Head SAR; 0.416 W/kg AMPS Body SAR; Max. SAR Measurement:

0.678 W/kg CDMA Head SAR; 0.375 W/kg CDMA Body SAR;

0.882 W/kg PCS CDMA Head SAR; 0.500 W/kg PCS CDMA Body SAR

Trade Name/Model(s): SCP-6600

**FCC Classification: Licensed Portable Transmitter Held to Ear (PCE)** §2.1093; FCC/OET Bulletin 65 Supplement C [July 2001] FCC Rule Part(s):

**Application Type:** Certification

**Test Device Serial No.:** identical prototype [S/N: 24710029316]

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. P1528-2003.

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. Endusers 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).

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

Figure 1.1 SAR Mathematical Equation

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

 $SAR = s E^2 / r$ 

where:

**s** = conductivity of the tissue-simulant material (S/m)

 $\mathbf{r}$  = mass density of the tissue-simulant material (kg/m<sup>3</sup>)

 $\mathbf{E}$  = 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.

### **System Electronics**

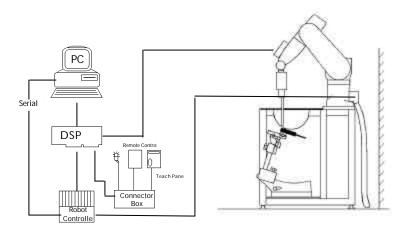


Figure 2.1 SAR Measurement System Setup

The DAE4 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, 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

### **Probe Measurement System**



Figure 3.1 DAE System

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  $2^{\rm nd}$  order fitting (see Fig. 3.1). The approach is stopped at reaching the maximum.

### **Probe Specifications**

Calibration: In air from 10 MHz to 6 GHz

In brain and muscle simulating tissue at

Frequencies of 150 MHz, 450 MHz, 835 MHz, 900 MHz, 1900MHz, 2450MHz, 5300MHz,

& 5800MHz

Frequency: 10 MHz to > 6 GHz; Linearity:  $\pm 0.2 \text{ dB}$ 

(30 MHz to 6 GHz)

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:  $\pm 0.2 \text{ dB}$ 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

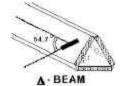


Figure 3.1 Triangular Probe Configuration



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  $\pm 10\%$ . The spherical isotropy was evaluated with the procedure described in [9] and found to be better than  $\pm 10\%$ . 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 Efield 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).

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

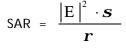
where:

 $\Delta t$  = exposure time (30 seconds),

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

 $\Delta T$  = 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;



where:

 $\sigma$  = simulated tissue conductivity,

 $\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

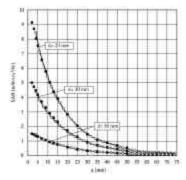


Figure 4.1 E-Field and Temperature measurements at 900MHz [7]

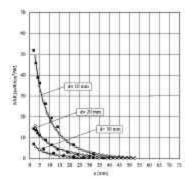


Figure 4.2 E-Field and temperature measurements at 1.9GHz [7]

<sup>\*</sup>NOTE: The temperature calibration was not performed by PCTEST. For information use only.

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## 5. PHANTOM & EQUIVALENT TISSUES

#### **SAM 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)

Figure 5.1 SAM Twin Phantom

## **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

Table 5.1 Composition of the Brain & Muscle Tissue Equivalent Matter

Time of Composition of the Final a Minister Time Equivalent Manager						
			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**



Figure 5.2 Mounting Device

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.

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### 6. TEST SYSTEM SPECIFICATIONS

## **Automated Test System Specifications**

#### **Positioner**

**Robot:** Stäubli Unimation Corp. Robot Model: RX60L

**Repeatability:** 0.02 mm

No. of axis: 6

#### **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, multiplexer, A/D converter, & control logic

Figure 6.1 DASY4 Test System

**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 DAE4

16 bit A/D converter for surface detection system

serial link to robot

direct emergency stop output for robot

#### **E-Field Probes**

**Model:** EX3DV4 S/N: 3561

**Construction:** Triangular core **Frequency:** 10 MHz to 6 GHz

**Linearity:**  $\pm 0.2 \text{ dB } (30 \text{ MHz to 6 GHz})$ 

#### **Phantom**

**Phantom:** SAM Twin Phantom (V4.0)

**Shell Material:** VIVAC Composite **Thickness:**  $2.0 \pm 0.2 \text{ mm}$ 

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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 re-measured. If the value changed by more than 5%, the evaluation is repeated.

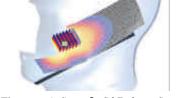


Figure 7.1 Sample SAR Area Scan

## 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  $90^{th}$  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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### 8. DEFINITION OF REFERENCE POINTS

#### **EAR Reference Point**

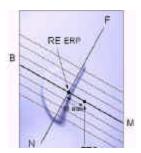


Figure 8.2 Close-up side view of ERPs

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.

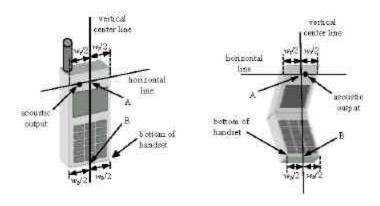


Figure 8.3 Handset Vertical Center & Horizontal Line Reference Points

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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)

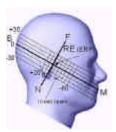


Figure 9.2 Side view w/ relevant markings

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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 9.3 Front, Side and Top View of Ear/15° Tilt Position

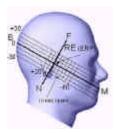


Figure 9.4 Side view w/ relevant markings

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## 9. TEST CONFIGURATION POSITIONS (Continued)

## **Body Holster / Belt Clip Configurations**

Body-worn operating configurations are tested with the beltclips 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.

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.





Figure 9.5 Body Belt Clip & Holster Configurations Example Photo (Not Actual EUT)

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.

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

	HUMAN EXPOSURE LIMITS				
	UNCONTROLLED ENVIRONMENT	CONTROLLED ENVIRONMENT			
	General Population	Occupational			
	(W/kg) or (mW/g)	(W/kg) or (mW/g)			
SPATIAL PEAK SAR <sup>1</sup>	1.60	8.00			
Brain	1.00	0.00			
SPATIAL AVERAGE SAR <sup>2</sup>	0.08	0.40			
Whole Body	0.00	0.10			
SPATIAL PEAK SAR <sup>3</sup>	4.00	20.00			
Hands, Feet, Ankles, Wrists		۵۵.00			

<sup>3</sup> 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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<sup>1</sup> 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.

<sup>2</sup> The Spatial Average value of the SAR averaged over the whole body.



## 11. MEASUREMENT UNCERTAINTIES

	h	_	al		£	~	h		ı,
а	b	С	d	e=	f	g	h =	i =	k
				f(d,k)			cxf/e	cxg/e	
Uncertainty		Tol.	Prob.		C <sub>i</sub>	C <sub>i</sub>	1 - g	10 - g	
Component	Sec.	(± %)	Dist.	Div.	(1 - g)	(10 - g)	ui	Ui	Vi
							(± %)	(± %)	
Measurement System									
Probe Calibration	E1.1	4.8	N	1	1	1	4.8	4.8	$\infty$
Axial Isotropy	E1.2	4.7	R	√3	0.7	0.7	1.9	1.9	$\infty$
Hemishperical Isotropy	E1.2	9.6	R	√3	0.7	0.7	3.9	3.9	$\infty$
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	$\infty$
System Detection Limits	E1.5	1.0	R	√3	1	1	0.6	0.6	$\infty$
Readout Electronics	E1.6	1.0	Ν	1	1	1	1.0	1.0	$\infty$
Response Time	E1.7	0.8	R	√3	1	1	0.5	0.5	$\infty$
Integration Time	E1.8	2.6	R	√3	1	1	1.5	1.5	$\infty$
RF Ambient Conditions	E5.1	3.0	R	$\sqrt{3}$	1	1	1.7	1.7	$\infty$
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	√3	1	1	0.2	0.2	$\infty$
Probe Positioning w/ respect to Phantom	E5.3	2.9	R	$\sqrt{3}$	1	1	1.7	1.7	$\infty$
Extrapolation, Interpolation & Integration	E4.2	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	$\infty$
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	$\infty$
measurement									
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness	E2.1	4.0	R	$\sqrt{3}$	1	1	2.3	2.3	$\infty$
tolerances)									
Liquid Conductivity - deviation from	E2.2	5.0	R	√3	0.64	0.43	1.8	1.2	8
target values									
Liquid Conductivity - measurement	E2.2	2.5	Ν	1	0.64	0.43	1.6	1.1	$\infty$
uncertainty									
Liquid Permittivity - deviation from	E2.2	5.0	R	√3	0.6	0.5	1.7	1.4	$\infty$
target values									
Liquid Permittivity - measurement	E2.2	2.5	N	1	0.6	0.5	1.5	1.2	$\infty$
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 - 2003.

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# 12. SYSTEM VERIFICATION

### **Tissue Verification**

**Table 12.1 Simulated Tissue Verification [5]** 

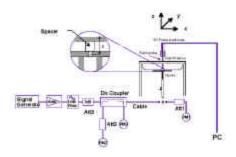
MEASURED TISSUE PARAMETERS									
Date(s)	April 4-5, 2006	835MHz Brain		835MHz Muscle		1900MHz Brain		1900MHz Muscle	
Liquid Temperature (°C)	21.3	Target	Measured	Target	Measured	Target	Measured	Target	Measured
Dielectric Constant: ε		41.50	42.13	55.20	56.10	40.00	40.31	53.50	52.44
Conductivity: σ		0.900	0.88	0.970	0.99	1.400	1.39	1.520	1.58

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 VALIDATION							
Date	Ambient Temp (°C)	Liquid Temp (°C)	Input Power (W)	Tissue	Targeted SAR (W/kg)	Measured SAR (W/kg)	Deviation (%)	
04/04/2006	23.2	21.2	0.250	835MHz Brain	2.375	2.440	2.73	
04/05/2006	23.1	20.8	0.200	0.250 000MHZ BIAM	2.070	2.510	5.68	
04/04/2006	23.4	21.4	0.100	1900MHz Brain	3.970	4.040	1.76	
04/05/2006	23.0	21.3	3.100	TOOMALE BININ	3.370	3.780	-4.78	

Figure 12.1 Dipole Validation Test Setup





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### 13. SAR TEST DATA SUMMARY

Power measurements were performed using a base station simulator under digital average power.

## **Procedures Used to Establish RF Signal for SAR**

The handset was placed into a simulated call using a base station simulator in a shielded chamber. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR[4]. SAR measurements were taken with a fully charged battery. In order to verify that the device was tested and maintained at full power, this was configured with the base station simulator. The SAR measurement software calculates a reference point at the start and end of the test to check for power drifts. If conducted power deviations of more than 5% occurred, the tests were repeated.

#### **SAR Measurement Conditions for CDMA2000**

The following procedures were followed according to FCC "SAR Measurement Procedures for 3G Devices", May 2006.

### **5.1.1 Output Power Verification**

See 3GPP2 C.S0011/TIA-98-E as recommended by "SAR Measurement Procedures for 3G Devices", May 2006. Maximum output power is verified on the High, Middle and Low channels according to procedures in section 4.4.5.2 of 3GPP2 C.S0011/TIA-98-E. SO55 tests were measured with power control bits in "All Up" condition.

- 1. If the mobile station (MS) supports Reverse TCH RC 1 and Forward TCH RC 1, set up a call using Fundamental Channel Test Mode 1 (RC=1/1) with 9600 bps data rate only.
- 2. Under RC1, C.S0011 Table 4.4.5.2-1, Table 0-1 parameters were applied.
- 3. If the MS supports the RC 3 Reverse FCH, RC3 Reverse SCH0 and demodulation of RC 3,4, or 5, set up a call using Supplemental Channel Test Mode 3 (RC 3/3) with 9600 bps Fundamental Channel and 9600 bps SCH0 data rate.
- 4. Under RC3, C.S0011 Table 4.4.5.2-2, Table 0-2 was applied.
- 5. FCHs were configured at full rate for maximum SAR with "All Up" power control bits.

Table 0-1
Parameters for Max. Power for RC1

Porensiales	('q¥<=	Vakie
Y <sub>G</sub> .	GSBURRIMNS:	i-61·
Met E-	ĠĿś	-2
Trasta By	ųï	.71

Table 0-2
Parameters for Max. Power for RC3

Parnennger	ASSO:i	Vajas
š <sub>oš</sub>	athorical Alb	86
Pika Fr. Va	-333	-7
finish (). 1 <sub></sub>	:\$}	-7 <b>1</b>

#### 5.1.2 Head SAR Measurements

SAR for head exposure configurations is measured in RC3 with the DUT configured to transmit at full rate using Loopback Service Option SO55. SAR for RC1 is not required when the maximum average output of each channel is less than  $\frac{1}{4}$  dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel in RC1 using the exposure configuration that results in the highest SAR for that channel in RC3.

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### 5.1.3 **Body SAR Measurements**

SAR for body exposure configurations is measured in RC3 with the DUT configured to transmit at full rate on FCH with all other code channels disabled using TDSO / SO32. SAR for multiple code channels (FCH + SCHn) is not required when the maximum average output of each RF channel is less than  $^{1}\!\!/4$  dB higher than that measured with FCH only. Otherwise, SAR is measured on the maximum output channel (FCH + SCHn) with FCH at full rate and SCH0 enabled at 9600 bps using the exposure configuration that results in the highest SAR for that channel with FCH only. When multiple code channels are enabled, the DUT output may shift by more than 0.5 dB and lead to higher SAR drifts and SCH dropouts. Body SAR was measured using TDSO / SO32 with power control bits in the "All Up"

Body SAR in RC1 is not required when the maximum average output of each channel is less than  $\frac{1}{4}$  dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel in RC1; with Loopback Service Option SO55, at full rate, using the body exposure configuration that results in the highest SAR for that channel in RC3.

#### 5.1.4 Handsets with EVDO

For handsets with Ev-Do capabilities, when the maximum average output of each channel in Rev. 0 is less than  $\frac{1}{4}$  dB higher than that measured in RC3 (1x RTT), body SAR for EV-DO is not required.7 Otherwise, SAR for Rev. 0 is measured on the maximum output channel at 153.6 kbps using the body exposure configuration that results in the highest SAR for that channel in RC3.7 SAR for Rev. A is not required when the maximum average output of each channel is less than that measured in Rev. 0 or less than  $\frac{1}{4}$  dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel for Rev. A using a Reverse Data Channel payload size of 4096 bits and a Termination Target of 16 slots defined for Subtype 2 Physical Layer configurations. A Forward Traffic Channel data rate corresponding to the 2-slot version of 307.2 kbps with the ACK Channel transmitting in all slots should be configured in the downlink for both Rev. 0 and Rev. A.

Table 0-3 Max. Power Output Table for AEZSCP-66H

Band	Channel	<b>1x EvDO</b> (153.6kbps)	CDMA2000 RC	SO2 Loopback	SO55 Loopback	TDSO SO32 Loopback
	1013	N/A	RC1	23.96	23.99	
		IN/A	RC3	24.02	24.04	24.00
Cellular	384	N/A	RC1	24.01	24.00	
Celiulai		IV/A	RC3	24.03	24.00	23.98
	777	N/A	RC1	24.06	23.95	
		IN/A	RC3	23.97	23.98	23.95
	0.5	NI/A	RC1	23.93	23.90	
	25	N/A	RC3	23.85	23.88	23.88
PCS	600	N/A	RC1	23.86	23.84	
F 0.3	600	IV/A	RC3	23.84	23.85	23.85
	1175	N/A	RC1	23.90	23.89	
	11/5	IN/A	RC3	23.90	23.91	23.90

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## **SAR DATA SUMMARY**

Mixture Type: 835MHz Brain

14.1 M	4.1 MEASUREMENT RESULTS (AMPS Right Head SAR – Touch)										
FREQUENCY Modulation		Modulation	Beg	Begin / End POWER‡			Device Test	Antenna	SAR		
MHz	Ch.	Modulation	(dF	Bm)	Battery	(MHz)	Position	Position	(W/kg)		
836.49	0383	AMPS	24.56	24.46	Standard	Off	Cheek/ Touch	Internal	0.769		
836.49	0383	AMPS	24.60	24.45	Standard	2441	Cheek/ Touch	Internal	0.764		
836.49	0383	AMPS	24.57	24.42	Extended	Off	Cheek/ Touch	Internal	0.686		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						1.6 W/kg	rain g (mW/g) over 1 gram			

### **NOTES:**

- 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.

0	D 44	1 6 11 11 .	C. 1 11	.1 1
3.	partery is fully charge	ea for all readings.	Standard batteries are	e the only obtions.

	<sup>‡</sup> Power Measured		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		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

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Mixture Type: 835MHz Brain

14.2 M	14.2 MEASUREMENT RESULTS (AMPS Right Head SAR – Tilt)									
FREQUENCY Modulation		Begin / End POWER <sup>‡</sup>				Device Test	Antenna	SAR		
MHz	Ch.	1120 1111111111111111111111111111111111	(dF	Bm)	Battery	(MHz)	Position	Position	(W/kg)	
836.49	0383	AMPS	24.60	24.48	Standard	Off	Ear / 15° Tilt	Internal	0.314	
		/ IEEE C95.1 199 Spatial l trolled Exposure	Peak		1		1.6 W/k	rain g (mW/g) over 1 gram		

#### NOTES:

- 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	Rattory is full	v charged for a	ll roadings	Extended batteries are	the only	ontions
J.	Dattery is full	y Chargeu for al	n reaumgs.	Extended patternes are	the only	options.

	<sup>‡</sup> Power Measured		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		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

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Mixture Type: 835MHz Brain

14.3 N	4.3 MEASUREMENT RESULTS (AMPS Left Head SAR - Touch)										
FREQUENCY Modulation		Begin / End POWER <sup>‡</sup>			Bluetooth	Device Test	Antenna	SAR			
MHz	Ch.	Wiodulation	(dI	Bm)	Battery	(MHz)	Position	Position	(W/kg)		
836.49	0383	AMPS	24.47	24.53	Standard	Off	Cheek/ Touch	Internal	0.606		
836.49	0383	AMPS	24.61	24.43	Standard	2441	Cheek/ Touch	Internal	0.592		
836.49	0383	AMPS	24.56	24.42	Extended	Off	Cheek/ Touch	Internal	0.509		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population					1.6 W/kg	rain g (mW/g) over 1 gram				

**EIRP** 

#### **NOTES:**

- 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.	Extended batteries are the only options.					
	<sup>‡</sup> Power Measured		Conducted		ERP		С

- 4. SAR Measurement System 

  □ DASY4 □ IDX
- 5. SAR Configuration
  6. Test Signal Call Mode
  ✓ Head
  ✓ Body
  ✓ Hand
  ✓ 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, 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).
- 10. Head SAR was tested under RC3/SO55

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Mixture Type: 835MHz Brain

14.4 M	14.4 MEASUREMENT RESULTS (AMPS Left Head SAR – Tilt)										
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>				Device Test	Antenna	SAR		
MHz	Ch.	1120 (1121)	(dBm)		Battery	(MHz)	Position	Position	(W/kg)		
836.49	0383	AMPS	24.57	24.43	Standard	Off	Ear / 15° Tilt	Internal	0.325		
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population							1.6 W/k	rain g (mW/g) over 1 gram			

#### NOTES:

- 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 ic full	v charged for all	l roadings	Extended batteries are t	ho only	ontions
ა.	Dattery is run	ly charged for an	i reauings.	Extended batteries are t	ше ошу	options

	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration	X	Left Head		Flat Phantom	Right Head
5.	SAR Configuration	X	Head		Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

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Mixture Type: 835MHz Brain

14.5 M	14.5 MEASUREMENT RESULTS (CDMA Right Head SAR – Touch)											
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth	Device Test	Antenna	SAR			
MHz	Ch.	Wiodulation	(dBm) Batte		Battery	(MHz)	Position	Position	(W/kg)			
836.49	0383	CDMA	24.01	24.05	Standard	Off	Cheek/ Touch	Internal	0.678			
836.49	0383	CDMA	24.08	24.07	Standard	2441	Cheek/ Touch	Internal	0.630			
836.49	0383	CDMA	24.03	23.97	Extended	Off	Cheek/ Touch	Internal	0.631			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						Brai 1.6 W/kg averaged over	(mW/g)				

#### **NOTES:**

- 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.	Extended batteries are	the only option

	<sup>‡</sup> Power Measured		Conducted		ERP		EIRP
4.	SAR Measurement System	X	DASY4		IDX		
	Phantom Configuration		Left Head		Flat Phantom	$\boxtimes$	Right Head
5.	SAR Configuration	X	Head		Body		Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	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
- 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).
- Head SAR was tested under RC3/SO55

FCC CERTIFICATION Reviewed by: PCTHBT PCTESTÔ SAR REPORT SANYO Quality Manager SAR Filename: Test Dates: Phone Type: Tri-Mode Dual-Band Analog/ FCC ID:

PCS Phone (AMPS/ CDMA) with Bluetooth

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AEZSCP-66H

April 4-5, 2006

0604040230



Mixture Type:	835MHz Brain
Mixture Type:	835MHZ Brain

14.6 M	14.6 MEASUREMENT RESULTS (CDMA Right Head SAR - Tilt)										
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth		Antenna	SAR		
MHz	Ch.		(dBm)		Battery	(MHz)	Position	Position	(W/kg)		
836.49	0383	CDMA	24.04	24.04 24.00		Off	Ear / 15° Tilt	Internal	0.299		
836.49 0383 CDMA 24.04 24.00 Standard  ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population							1.6 W/kg	ain g (mW/g) ver 1 gram			

- 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	v charged for	all readings.	Extended batteries	are the only	options

	<sup>‡</sup> Power Measured		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		Manu. Test Codes	X	Base Station Simulator		
7	Tissue parameters and temperatures are listed or	the S	SAR plots				

- Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm.  $\pm$  0.1
- 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).
- Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 24 of 39



Mixture Type: 835MHz Brain

14.7 M	<b>EASU</b>	REMENT RI	ESULTS	CDM (CDM	A Left H	ead SAR -	– Touch)			
FREQUENCY		FREQUENCY		Modulation	Begin / End POWER‡		Bluetooth	Device Test	Antenna	SAR
MHz	Ch.	Wiodulation	(dBm) Batter		Battery	(MHz)	Position	Position	(W/kg)	
836.49	0383	CDMA	24.03	24.05	Standard	Off	Cheek/ Touch	Internal	0.572	
836.49	0383	CDMA	24.04	24.06	Standard	2441	Cheek/ Touch	Internal	0.544	
836.49	0383	CDMA	24.06	24.00	Extended	Off	Cheek/ Touch	Internal	0.513	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						Brain 1.6 W/kg (n averaged over	mW/g)		

#### NOTES:

- 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.

	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration	X	Left Head		Flat Phantom	Right Head
5.	SAR Configuration	X	Head		Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 25 of 39



Mixture Type: 835MHz Brain

14.8 MEASUREMENT RESULTS (CDMA Left Head SAR - Tilt)										
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth	Device Test	Antenna	SAR	
MHz	Ch.	Wiouullion	(dBm)		Battery	(MHz)	Position	Position	(W/kg)	
836.49	0383	CDMA	24.05	24.00	Standard	Off	Ear / 15° Tilt	Internal	0.283	
ANSI / IEEE C95.1 1992 - SAFETY LIM  Spatial Peak  Uncontrolled Exposure/General Population							Brai 1.6 W/kg ( averaged ove	(mW/g)		

#### NOTES:

- 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.	Rattery is full	v charged for all	l readings	Extended batteries are	the only	ontions
J.	Dattery is full	y Chargeu lor an	i reauiiigs.	Extended patternes are	the omy	options.

	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration	X	Left Head		Flat Phantom	Right Head
5.	SAR Configuration	X	Head		Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 26 of 39



Mixture Type: 1900MHz Brain

			•			SAR – To		
ENCY	Modulation	Beg	gin / End P	OWER <sup>‡</sup>	VER <sup>‡</sup> Bluetooth		Antenna	SAR
Ch.	Widualion	(dBm) Battery (MHz)	Position	Position	(W/kg)			
0025	PCS CDMA	23.95	23.98	Standard	Off	Cheek/ Touch	Internal	0.882
0600	PCS CDMA	23.90	23.91	Standard	Off	Cheek/ Touch	Internal	0.838
1175	PCS CDMA	23.85	23.80	Standard	Off	Cheek/ Touch	Internal	0.759
0025	PCS CDMA	23.95	23.98	Standard	2441	Cheek/ Touch	Internal	0.876
0025	PCS CDMA	23.96	23.95	Extended	Off	Cheek/ Touch	Internal	0.881
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak						Brain 1.6 W/kg (mW/g)		
	Ch. 0025 0600 1175 0025 0025	Modulation  Ch.  0025 PCS CDMA  0600 PCS CDMA  1175 PCS CDMA  0025 PCS CDMA  0025 PCS CDMA  ANSI / IEEE C95.1 19  Spatial	Modulation         (dB)           0025         PCS CDMA         23.95           0600         PCS CDMA         23.90           1175         PCS CDMA         23.85           0025         PCS CDMA         23.95           0025         PCS CDMA         23.96           ANSI / IEEE C95.1 1992 - SAFET           Spatial Peak	Ch.         (dBm)           0025         PCS CDMA         23.95         23.98           0600         PCS CDMA         23.90         23.91           1175         PCS CDMA         23.85         23.80           0025         PCS CDMA         23.95         23.98           0025         PCS CDMA         23.96         23.95           ANSI / IEEE C95.1 1992 - SAFETY LIMIT	Ch.         (dBm)         Battery           0025         PCS CDMA         23.95         23.98         Standard           0600         PCS CDMA         23.90         23.91         Standard           1175         PCS CDMA         23.85         23.80         Standard           0025         PCS CDMA         23.95         23.98         Standard           0025         PCS CDMA         23.96         23.95         Extended           ANSI / IEEE C95.1 1992 - SAFETY LIMIT           Spatial Peak	Modulation         Graph (MHz)           Ch.         (dBm)         Battery           (MHz)           0025         PCS CDMA         23.95         23.98         Standard         Off           1175         PCS CDMA         23.85         23.80         Standard         Off           0025         PCS CDMA         23.95         23.98         Standard         2441           0025         PCS CDMA         23.96         23.95         Extended         Off           ANSI / IEEE C95.1 1992 - SAFETY LIMIT           Spatial Peak	Ch.         (dBm)         Battery         (MHz)         Position           0025         PCS CDMA         23.95         23.98         Standard         Off         Cheek/Touch           0600         PCS CDMA         23.90         23.91         Standard         Off         Cheek/Touch           1175         PCS CDMA         23.85         23.80         Standard         Off         Cheek/Touch           0025         PCS CDMA         23.95         23.98         Standard         2441         Cheek/Touch           0025         PCS CDMA         23.96         23.95         Extended         Off         Cheek/Touch           ANSI / IEEE C95.1 1992 - SAFETY LIMIT         Brain 1.6 W/kg (appraised over aged over ag	Modulation   Ch.   (dBm)   Battery   Device Test   Position   Position

#### **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 o	charged for all readings.	Extended batte	eries are the only options	
	†n	3.5	1	_	Condested	_

		Conducted	_	ERP	ш	EIRP
asurement System	X	DASY4		IDX		
n Configuration		Left Head		Flat Phantom	X	Right Head
nfiguration	X	Head		Body		Hand
nal Call Mode		Manu. Test Codes	X	Base Station Simulator		
ľ	easurement System n Configuration nfiguration nal Call Mode	n Configuration	n Configuration	n Configuration	n Configuration	nfiguration

- 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 27 of 39



Mixture Type: 1900MHz Brain

<b>14.10</b> 1	14.10 MEASUREMENT RESULTS (PCS CDMA Right Head SAR – Tilt)										
FREQUENCY Modulation		Beg	Begin / End POWER <sup>‡</sup>			Device Test	Antenna	SAR			
MHz	Ch.		(dBm)	Battery	(MHz)	Position	Position	(W/kg)			
1880.00	0600	PCS CDMA	23.91	23.90	Standard	Off	Ear / 15° Tilt	Internal	0.207		
ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						1.6 W/kg	ain g (mW/g) wer 1 gram				

#### NOTES:

- 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 al	l readings.	Extended batteries are	the only options.
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	<sup>‡</sup> Power Measured		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		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 28 of 39



Mixture Type: 1900MHz Brain

14.11 N	4.11 MEASUREMENT RESULTS (PCS CDMA Left Head SAR – Touch)										
FREQU	ENCY	ICY Modulation		in / End PC	OWER <sup>‡</sup>	Bluetooth	Device Test	Antenna	SAR		
MHz	Ch.	Modulation	(dBm) Battery		(MHz)	Position	Position	(W/kg)			
1880.00	0600	PCS CDMA	23.88	23.87	Standard	Off	Cheek / Touch	Internal	0.582		
1880.00	0600	PCS CDMA	23.85	23.90	Standard	2441	Cheek / Touch	Internal	0.567		
1880.00	0600	PCS CDMA	23.91	23.89	Extended	Off	Cheek / Touch	Internal	0.443		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						Brain 1.6 W/kg (i averaged over	mW/g)			

#### **NOTES:**

- 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.	Extended batteries are	the only options.

	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration	X	Left Head		Flat Phantom	Right Head
5.	SAR Configuration	X	Head		Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	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, 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PCTHBT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 29 of 39



Mixture Type: 1900MHz Brain

14.12 I	14.12 MEASUREMENT RESULTS (PCS CDMA Left Head SAR – Tilt)										
FREQU	ENCY	Modulation	Begin / End PO		OWER <sup>‡</sup>	Bluetooth Device Test					
MHz	Ch.	Wiouullion	(dBm) Battery		(MHz)	Position	Position	(W/kg)			
1880.00	0600	PCS CDMA	23.85	23.87	Standard	Off	Ear / 15° Tilt	Internal	0.259		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  Uncontrolled Exposure/General Population						Brain 1.6 W/kg averaged over	(mW/g)			

#### NOTES:

- 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.	Rattery is full	v charged for all	lraadinge	Extended batteries are	the only	ontions
ა.	Dattery is ruii	y chargeu for an	i reauiiigs.	Extended patternes are	the only	opuons.

<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4. SAR Measurement System	X	DASY4		IDX	
Phantom Configuration	X	Left Head		Flat Phantom	Right Head
5. SAR Configuration	X	Head		Body	Hand
6. Test Signal Call Mode		Manu. Test Codes	$\times$	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, 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).
- 10. Head SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 30 of 39



Mixture Type: 835MHz Muscle

14.13 I	14.13 MEASUREMENT RESULTS (AMPS Body SAR w/o Holster, Front Side)										
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth	Separation	Antenna	SAR		
MHz	Ch.		(dBm) Battery		Battery	(MHz)	Distance (cm) <sup>‡‡</sup>	Position	(W/kg)		
836.49	0383	AMPS	24.54	24.45	Standard	Off	2.2 cm (w/o holster)	Internal	0.301		
836.49	0383	AMPS	24.56	24.52	Standard	2441	2.2 cm (w/o holster)	Internal	0.298		
836.49	0383	AMPS	24.46	24.40	Extended	Off	2.2 cm (w/o holster)	Internal	0.297		
	ANSI	/ IEEE C95.1 19	92 - SAFET	Y LIMIT		Muscle					
	Spatial Peak						1.6 W/kg (mW/g)				
	Uncont	rolled Exposure	e/General P	opulation		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.
- 2. All modes of operation were investigated, and worst-case results are reported.

3.	Battery is fully charged for all readings.	Extended batt	eries are the only opti	ions.		
	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration		Left Head	X	Flat Phantom	Right Head
5.	SAR Configuration		Head	X	Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator	
7.	‡‡Test Configuration		With Holster	X	Without Holster	

- 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
- 11. 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).
- 12. Body SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 31 of 39



835MHz Muscle Mixture Type:

<b>14.14</b> I	14.14 MEASUREMENT RESULTS (AMPS Body SAR w/o Holster, Back Side)										
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth	F	Antenna	SAR		
MHz	Ch.	1/2044241202	(dI	Bm)	Battery	(MHz)	Distance (cm) <sup>‡‡</sup>	Position	(W/kg)		
836.49	0383	AMPS	24.52	24.46	Standard	Off	2.2 cm (w/o holster)	Internal	0.416		
836.49	0383	AMPS	24.54	24.40	Standard	2441	2.2 cm (w/o holster)	Internal	0.406		
836.49	0383	AMPS	24.51	24.48	Extended	Off	2.2 cm (w/o holster)	Internal	0.359		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Muscle 1.6 W/kg (mW/g) averaged over 1 gram				

- The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration.
- All modes of operation were investigated, and worst-case results are reported.

3.	Battery is fully	charged for	all readings.	Extended batteries are th	e only options
----	------------------	-------------	---------------	---------------------------	----------------

	<sup>‡</sup> Power Measured		Conducted		ERP		EIRP	
4.	SAR Measurement System	X	DASY4		IDX			
	Phantom Configuration		Left Head	X	Flat Phantom		Right Head	
5.	SAR Configuration		Head	X	Body		Hand	
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator			
7.	‡‡Test Configuration		With Holster	X	☑ Without Holster			
8.	Tissue parameters and temperatures are listed or	the S	SAR plots.					
0	Poth sides of the phone were tested and the wor	ct cac	o sido is roportod					

- Both sides of the phone were tested and the worst-case side is reported.
- 10. Liquid tissue depth is 15.1 cm.  $\pm\,0.1$
- 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).
- 12. Body SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 32 of 39



Mixture Type: 835MHz Muscle

<b>14.15</b> 1	14.15 MEASUREMENT RESULTS (CDMA Body SAR w/o Holster, Front Side)											
FREQUENCY		Modulation	Begin / End POWER‡			Bluetooth		Antenna	SAR			
MHz	Ch.	Modulation	(dF	Bm)	Battery	(MHz)	Distance (cm) <sup>‡‡</sup>	Position	(W/kg)			
836.49	0383	CDMA	24.08	24.01	Standard	Off	2.2 cm (w/o holster)	Internal	0.286			
836.49	0383	CDMA	24.02	23.98	Standard	2441	2.2 cm (w/o holster)	Internal	0.269			
836.49	0383	CDMA	24.04	24.00	Standard	Off	2.2 cm (w/o holster)	Internal	0.265			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Muscle 1.6 W/kg (mW/g) 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.
- 2. All modes of operation were investigated, and worst-case results are reported.
- $3. \hspace{0.5cm} \hbox{Battery is fully charged for all readings. } \hbox{Extended batteries are the only options.} \\$

	<sup>‡</sup> Power Measured		Conducted		ERP		EIRP
4.	SAR Measurement System	X	DASY4		IDX		
	Phantom Configuration		Left Head	X	Flat Phantom		Right Head
5.	SAR Configuration		Head	X	Body		Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator		
7.	‡‡Test Configuration		With Belt-clip	X	Without Belt-clip		

- 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
- 11. 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).
- 12. Body SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	POTEST	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 33 of 39



Mixture Type: 835MHz Muscle

14.16	14.16 MEASUREMENT RESULTS (CDMA Body SAR w/o Holster, Back Side)									
FREQU	FREQUENCY		Begin / End POWER <sup>‡</sup>			Bluetooth		Antenna	SAR	
MHz	Ch.	Modulation	(dI	Bm)	Battery	(MHz)	Distance (cm) <sup>‡‡</sup>	Position	(W/kg)	
836.49	0383	CDMA	24.07	24.04	Standard	Off	2.2 cm (w/o holster)	Internal	0.375	
836.49	0383	CDMA	24.02	24.00	Standard	2441	2.2 cm (w/o holster)	Internal	0.369	
836.49	0383	CDMA	23.98	24.01	Standard	Off	2.2 cm (w/o holster)	Internal	0.330	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak Uncontrolled Exposure/General Population						Muscle 1.6 W/kg (m) averaged over 1 g			

#### **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.	Extended batteries are	the only options.
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	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration		Left Head	X	Flat Phantom	Right Head
5.	SAR Configuration		Head	X	Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator	
7.	‡‡Test Configuration		With Belt-clip	X	Without Belt-clip	

- 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
- 11. 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).
- 12. Body SAR was tested under RC3/SO55

Rondy Ortanez

PCTESTÔ SAR REPORT FCC CERTIFICATION Reviewed to

PCTESTÔ SAR REPORT	POTEST	FCC CERTIFICATION	SANYO	<b>Reviewed by:</b> Quality Manager
SAR Filename:	Test Dates:	Phone Type: Tri-Mode Dual-Band Analog/	FCC ID:	Page 34 of 39
0604040230	April 4-5, 2006	PCS Phone (AMPS/ CDMA) with Bluetooth	AEZSCP-66H	1 490 0 1 01 07



Mixture Type: 1900MHz Muscle

#### 14.17 MEASUREMENT RESULTS (PCS CDMA Body SAR w/o Holster, Front Side) Begin / End POWER<sup>‡</sup> **FREQUENCY** SAR Bluetooth Antenna Separation Modulation Distance (cm) ‡‡ (MHz) Position (W/kg) MHz Ch. (dBm) **Battery** 1880.00 0600 PCS CDMA 23.95 Off 0.293 23.89 Standard 2.2 cm (w/o holster) Internal 1880.00 0600 PCS CDMA 23.90 2441 23.89 Standard 2.2 cm (w/o holster) Internal 0.2911880.00 0600 PCS CDMA 23.90 23.94 Extended Off 2.2 cm (w/o holster) Internal 0.205ANSI / IEEE C95.1 1992 - SAFETY LIMIT Muscle $1.6 \,\mathrm{W/kg} \,\mathrm{(mW/g)}$ **Spatial Peak** averaged over 1 gram **Uncontrolled Exposure/General Population**

#### **NOTES:**

3.

- 1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration.
- 2. All modes of operation were investigated, and worst-case results are reported.

Battery is fully charged for all readings. Extended batteries are the only options.

	5 5 6		J 1			
	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration		Left Head	X	Flat Phantom	Right Head
5.	SAR Configuration		Head	X	Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator	
7.	‡‡Test Configuration		With Holster	X	Without Holster	

- 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
- 11. 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).
- 12. Body SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PETERT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 35 of 39



Mixture Type: 1900MHz Muscle

<b>14.18</b> I	14.18 MEASUREMENT RESULTS (PCS CDMA Body SAR w/o Holster, Back Side)								
FREQUENCY		Modulation	Begin / End POWER <sup>‡</sup>			Bluetooth	Separation	Antenna	SAR
MHz	Ch.	1,20	(dl	Bm)	Battery	(MHz)	Distance (cm) <sup>‡‡</sup>	Position	(W/kg)
1880.00	0600	PCS CDMA	23.94	23.89	Standard	Off	2.2 cm (w/o holster)	Internal	0.500
1880.00	0600	PCS CDMA	23.90	23.91	Standard	2441	2.2 cm (w/o holster)	Internal	0.457
1880.00	0600	PCS CDMA	23.95	23.90	Extended	Off	2.2 cm (w/o holster)	Internal	0.256
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak Uncontrolled Exposure/General Population						Muscle 1.6 W/kg (m) averaged over 1 g	W/g)	

#### **NOTES:**

- 1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration.
- 2. All modes of operation were investigated, and worst-case results are reported.

<b>5</b> .	Battery is fully charged for all readings.	xtended battei	ries are the only options	S.		
	<sup>‡</sup> Power Measured		Conducted		ERP	EIRP
4.	SAR Measurement System	X	DASY4		IDX	
	Phantom Configuration		Left Head	$\boxtimes$	Flat Phantom	Right Head
5.	SAR Configuration		Head	$\boxtimes$	Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simulator	
7.	‡‡Test Configuration		With Holster	$\times$	Without Holster	

- 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
- 11. 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).
- 12. Body SAR was tested under RC3/SO55

PCTESTÔ SAR REPORT	PCTHBT	FCC CERTIFICATION	SANYO	Reviewed by: Quality Manager
<b>SAR Filename:</b> 0604040230	Test Dates: April 4-5, 2006	Phone Type: Tri-Mode Dual-Band Analog/ PCS Phone (AMPS/ CDMA) with Bluetooth	FCC ID: AEZSCP-66H	Page 36 of 39



## 15. SAR TEST EQUIPMENT

## **Equipment Calibration**

Туре	Cal Due	Serial Number
Staubli Robot RX60L	Oct 2007	599131-01
Staubli Robot Controller	Oct 2007	PCT592
Staubli Teach Pendant (Joystick)	Oct 2007	3323-00161
Gateway Computer, 2.52GHz/768MB,Windows-XP	N/A	PCT678
SPEAG EDC3	Oct 2007	321
SPEAG DAE4	Sep 2006	649
SPEAG DAE4	Aug 2006	665
SPEAG E-Field Probe EX3DV4	Aug 2006	3561
SPEAG Dummy Probe	Oct 2006	PCT583
SPEAG SAM Twin Phantom V4.0	Oct 2006	PCT666
SPEAG Light Alignment Sensor	Oct 2006	205
SPEAG Validation Dipole D835V2	Feb 2007	PCT512
SPEAG Validation Dipole D1900V2	Feb 2007	PCT613
Rohde & Schwarz CMD80 Base Station Simulator	Jun 2006	830805/005
Rohde & Schwarz CMU200 Base Station Simulator	Oct 2006	650378
Agilent 8960 Test Communications Set	Jan 2007	GB43193972
SPEAG Freespace 1900MHz Dipole	Feb 2007	1002
SPEAG Freespace 2450 MHz Dipole	Feb 2007	1004
ETS Freespace 835 MHz Dipole	Feb 2007	A005
SPEAG Freespace 835 MHz Dipole	Feb 2007	1003
SPEAG Freespace H-Field Probe	Aug 2006	6170
SPEAG Freespace E-Field Probe	Aug 2006	2353
MW Amp. Model: 5S1G4, (800MHz - 4.2GHz)	Jan 2007	22332
Gigatronics 8651A Power Meter	Jan 2007	1835299
Gigatronics 80701A Sensor(50MHz-18GHz)	Jan 2007	PCT606
HP-8648D (9kHz ~ 4GHz) Signal Generator	Jan 2007	PCT530
HP-8241A (-18GHz) Signal Generator	Jan 2007	
Amplifier Research 5S1G4 AMP	Jan 2007	PCT540
HP-8753E (30kHz ~ 3GHz) Network Analyzer	Jun 2006	PCT552
HP85070B Dielectric Probe Kit	Jun 2006	PCT501
Ambient Noise/Reflection, etc. (<12mW/kg/<3%of SAR)	N/A	Anechoic Room PCT01

**Table 15.1 Test Equipment Calibration** 

#### 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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