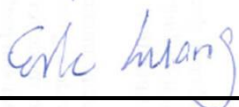


FCC SAR Test Report

APPLICANT : Romano LLC
EQUIPMENT : Electronic Display Device
MODEL NAME : NM460GZ
FCC ID : AKD-7291
STANDARD : FCC 47 CFR Part 2 (2.1093)
ANSI/IEEE C95.1-1992
IEEE 1528-2003

The product was completely tested on Nov. 22, 2014. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the procedures and shown the compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC., the test report shall not be reproduced except in full.



Reviewed by: Eric Huang / Deputy Manager



Approved by: Jones Tsai / Manager



SPORTON INTERNATIONAL INC.

No. 52, Hwa Ya 1st Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C.

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Appendix A. Plots of System Performance Check
Appendix B. Plots of SAR Measurement
Appendix C. DASy Calibration Certificate

Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA2N3053	Rev. 01	Initial issue of report	Jan. 29, 2014

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Romano LLC Electronic Display Device, NM460GZ** are as follows.

<Highest SAR Summary>

Exposure Position	Frequency Band	Reported 1g-SAR (W/kg)	Equipment Class	Highest Reported 1g-SAR (W/kg)
Body (Separation 0.5cm)	WCDMA Band V	0.16	PCB	0.41
	WCDMA Band II	0.41		

Note: The reported SAR is derived from the measured SAR results scaled down by the transmission duty factor of each wireless interface while transmission duty factor for this device and intended operation is detailed in UBTF analysis exhibit.

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2003.

2. Administration Data

2.1 Testing Laboratory

Test Site	SPORTON INTERNATIONAL INC.
Test Site Location	No. 52, Hwa Ya 1 st Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C. TEL: +886-3-327-3456 FAX: +886-3-328-4978

2.2 Applicant

Company Name	Romano LLC
Address	1180 Avenue of the Americas, Suite 210, New York, NY 10036-980

2.3 Application Details

Date of Start during the Test	Nov. 21, 2014
Date of End during the Test	Nov. 22, 2014

3. General Information

3.1 Description of Equipment Under Test (EUT)

Product Feature & Specification	
EUT	Electronic Display Device
Model Name	NM460GZ
FCC ID	AKD-7291
S / N	B05414093374006E
Tx Frequency Range	GSM850: 824.2 MHz ~ 848.8 MHz GSM1900: 1850.2 MHz ~ 1909.8 MHz WCDMA Band V: 826.4 MHz ~ 846.6 MHz WCDMA Band II: 1852.4 MHz ~ 1907.6 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz
Rx Frequency Range	GSM850: 869.2 MHz ~ 893.8 MHz GSM1900: 1930.2 MHz ~ 1989.8 MHz WCDMA Band V: 871.4 MHz ~ 891.6 MHz WCDMA Band II: 1932.4 MHz ~ 1987.6 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz
Type of Modulation	GPRS: GMSK EDGE: GMSK / 8PSK WCDMA: QPSK HSDPA: QPSK 802.11b : DSSS (DBPSK / DQPSK / CCK) 802.11g/n : OFDM (BPSK / QPSK / 16QAM / 64QAM)
Maximum Measured Output Power to Antenna	GSM850 :32.29 dBm GSM1900 :29.81 dBm WCDMA Band V :22.12 dBm WCDMA Band II :22.26 dBm 802.11b :16.88 dBm 802.11g :14.93 dBm 802.11n HT20 :14.87 dBm
Antenna Type	Fixed Internal Antenna
EUT Stage	Production Unit
Remark:	
<ol style="list-style-type: none"> The above EUT's information was declared by manufacturer. Please refer to the specifications or user's manual for more detailed description. According to the UBTF analysis exhibit, GSM, WCDMA and WLAN maximum tune-up power scaled down with the transmission factor is applied in standalone SAR test exclusion threshold analysis and is exempted from SAR testing. 	

3.2 Maximum target power among production units

Mode	GSM 850	GSM 1900
	Average Power (dBm)	Average Power (dBm)
GPRS/EDGE (GMSK, 1 Tx slot)	33	31
GPRS/EDGE (GMSK, 2 Tx slots)	33	30
EDGE (8PSK, 1 Tx slot)	28	27
EDGE (8PSK, 2 Tx slots)	28	27

Mode	WCDMA Band V	WCDMA Band II
	Average power(dBm)	
RMC 12.2Kbps	23	23
HSDPA Subtest-1	23	23
HSDPA Subtest-2	23	23
HSDPA Subtest-3	23	23
HSDPA Subtest-4	23	23

WLAN 2.4GHz	IEEE 802.11 Average Power (dBm)		
Channel	11b	11g	HT20
Ch1	17	11.5	11.5
Ch6	17	15	15
Ch11	17	12	11.5

3.3 Applied Standard

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2003
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r02
- FCC KDB 865664 D02 SAR Reporting v01r01
- FCC KDB 447498 D01 General RF Exposure Guidance v05r01
- FCC KDB 941225 D01 SAR test for 3G devices v02
- FCC KDB 941225 D02 HSPA and 1x Advanced v02r02
- FCC KDB 941225 D03 SAR Test Reduction GSM GPRS EDGE v01
- FCC KDB 941225 D07 UMPC Mini Tablet v01r01

3.4 Device Category and SAR Limits

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user. Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

3.5 Test Conditions

3.5.1 Ambient Condition

Ambient Temperature	20 to 24 °C
Humidity	< 60 %

3.5.2 Test Configuration

For WWAN SAR testing, the device was controlled by using a base station emulator. Communication between the device and the emulator was established by air link. The distance between the EUT and the antenna of the emulator is larger than 50 cm and the output power radiated from the emulator antenna is at least 30 dB smaller than the output power of EUT.

4. Specific Absorption Rate (SAR)

4.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

4.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

$$\mathbf{SAR} = \frac{d}{dt} \left(\frac{dW}{dm} \right) = \frac{d}{dt} \left(\frac{dW}{\rho dv} \right)$$

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

SAR measurement can be either related to the temperature elevation in tissue by

$$\mathbf{SAR} = C \left(\frac{\delta T}{\delta t} \right)$$

Where: C is the specific heat capacity, δT is the temperature rise and δt is the exposure duration, or related to the electrical field in the tissue by

$$\mathbf{SAR} = \frac{\sigma |E|^2}{\rho}$$

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

5. SAR Measurement System

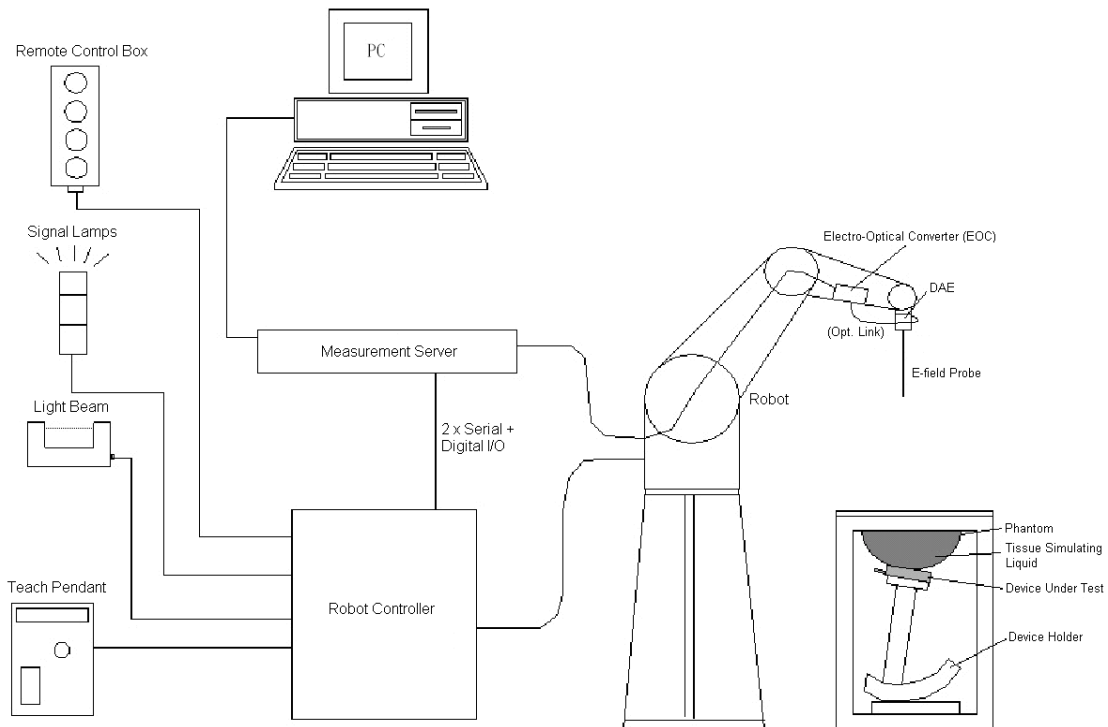


Fig 5.1 SPEAG DASY System Configurations

The DASY system for performance compliance tests is illustrated above graphically. This system consists of the following items:

- A standard high precision 6-axis robot with controller, a teach pendant and software
- A data acquisition electronic (DAE) attached to the robot arm extension
- A dosimetric probe equipped with an optical surface detector system
- The electro-optical converter (EOC) performs the conversion between optical and electrical signals
- A measurement server performs the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning
- A computer operating Windows XP
- DASY software
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom
- A device holder
- Tissue simulating liquid
- Dipole for evaluating the proper functioning of the system

Component details are described in in the following sub-sections.

5.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

5.1.1 E-Field Probe Specification

<EX3DV4 Probe>


Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB	
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	10 μ W/g to 100 mW/g; Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)	
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

Fig 5.2 Photo of EX3DV4/ES3DV4

5.1.2 E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy shall be evaluated and within ± 0.25 dB. The sensitivity parameters (NormX, NormY, and NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data can be referred to appendix C of this report.

5.2 Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE) 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 measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



Fig 5.3 Photo of DAE

5.3 Robot

The SPEAG DASY system uses the high precision robots (DASY4: RX90BL; DASY5: TX90XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY4: CS7MB; DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ± 0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

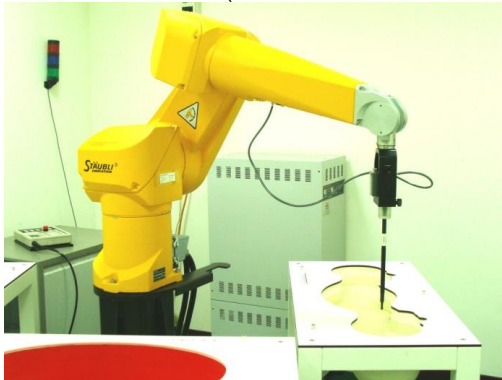


Fig 5.4 Photo of DASY4



Fig 5.5 Photo of DASY5

5.4 Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY4: 166 MHz, Intel Pentium; DASY5: 400 MHz, Intel Celeron), chipdisk (DASY4: 32 MB; DASY5: 128 MB), RAM (DASY4: 64 MB, DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.



Fig 5.6 Photo of Server for DASY4



Fig 5.7 Photo of Server for DASY5

5.5 Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm
Filling Volume	Approx. 25 liters
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet
Measurement Areas	Left Hand, Right Hand, Flat Phantom



Fig 5.8 Photo of SAM Phantom

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI4 Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%)
Filling Volume	Approx. 30 liters
Dimensions	Major ellipse axis: 600 mm Minor axis: 400 mm



Fig 5.9 Photo of ELI4 Phantom

The ELI4 phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

5.6 Device Holder

<Device Holder for SAM Twin Phantom>

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ± 0.5 mm would produce a SAR uncertainty of ± 20 %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.



Fig 5.10 Device Holder

<Laptop Extension Kit>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.

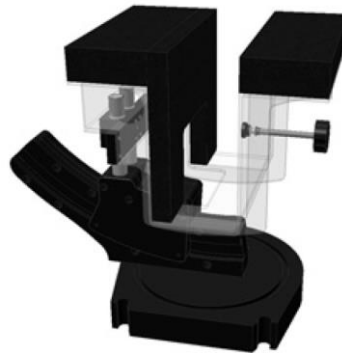


Fig 5.11 Laptop Extension Kit

5.7 Data Storage and Evaluation

5.7.1 Data Storage

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The post-processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of erroneous parameter settings. For example, if a measurement has been performed with an incorrect crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type (e.g., [V/m], [A/m], [mW/g]). Some of these units are not available in certain situations or give meaningless results, e.g., a SAR-output in a non-lose media, will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

5.7.2 Data Evaluation

The DASY post-processing software (SEMCAD) automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software :

Probe parameters :	- Sensitivity	$Norm_i, a_{i0}, a_{i1}, a_{i2}$
	- Conversion factor	$ConvF_i$
	- Diode compression point	dcp_i
Device parameters :	- Frequency	f
	- Crest factor	cf
Media parameters :	- Conductivity	σ
	- Density	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

The formula for each channel can be given as :

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i, (i = x, y, z)
 U_i = input signal of channel i, (i = x, y, z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

From the compensated input signals, the primary field data for each channel can be evaluated :

$$\text{E-field Probes : } E_i = \sqrt{\frac{V_i}{\text{Norm}_i \cdot \text{ConvF}}}$$

$$\text{H-field Probes : } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

with V_i = compensated signal of channel i, (i = x, y, z)
 Norm_i = sensor sensitivity of channel i, (i = x, y, z), $\mu\text{V}/(\text{V}/\text{m})^2$ for E-field Probes
 ConvF = sensitivity enhancement in solution
 a_{ij} = sensor sensitivity factors for H-field probes
 f = carrier frequency [GHz]
 E_i = electric field strength of channel i in V/m
 H_i = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude) :

$$E_{\text{tot}} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$\text{SAR} = E_{\text{tot}}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with SAR = local specific absorption rate in mW/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

Note that the density is set to 1, to account for actual head tissue density rather than the density of the tissue simulating liquid.

5.8 Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	835MHz System Validation Kit	D835V2	499	Mar. 18, 2013	Mar. 17, 2014
SPEAG	1900MHz System Validation Kit	D1900V2	5d041	Mar. 20, 2013	Mar. 19, 2014
SPEAG	Data Acquisition Electronics	DAE3	495	May. 08, 2013	May. 07, 2014
SPEAG	Dosimetric E-Field Probe	EX3DV4	3925	Jun. 12, 2013	Jun. 11, 2014
H.M.IRIS	Thermometer	TH-08	TM658	Oct. 22, 2013	Oct. 21, 2014
Agilent	Wireless Communication Test Set	E5515C	MY50266977	May. 06, 2013	May. 05, 2015
SPEAG	Device Holder	N/A	N/A	NCR	NCR
R&S	Signal Generator	SMF 100A	101107	May. 27, 2013	May. 26, 2014
SPEAG	Dielectric Probe Kit	DAK-3.5	1126	Jul. 23, 2013	Jul. 22, 2014
Agilent	ENA Network Analyzer	E5071C	MY46316648	Feb. 07, 2013	Feb. 06, 2014
Anritsu	Power Meter	ML2495A	1132003	Aug. 28, 2013	Aug. 27, 2014
Anritsu	Power Sensor	MA2411B	1126017	Aug. 27, 2013	Aug. 26, 2014
Agilent	Dual Directional Coupler	778D	50422	Note 2	
Woken	Attenuator 1	WK0602-XX	N/A	Note 2	
PE	Attenuator 2	PE7005-10	N/A	Note 2	
PE	Attenuator 3	PE7005- 3	N/A	Note 2	
AR	Power Amplifier	5S1G4M2	328767	Note 3	
R&S	Spectrum Analyzer	FSP 7	101131	Jul. 09, 2013	Jul. 08, 2014

Table 5.1 Test Equipment List

Note:

1. The calibration certificate of DASYS can be referred to appendix C of this report.
2. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via the network analyzer and compensated during system check.
3. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in pure water) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure and calibration kit are provided by Agilent.
4. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to have precise power level to the dipole; the measured SAR will be normalized to 1W input power according to the ratio of 1W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not critically required for correct measurement; the power meter is critical and we do have calibration for it
5. Attenuator 1 insertion loss is calibrated by the network Analyzer, which the calibration is valid, before system check.

6. Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 6.1. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 6.2.

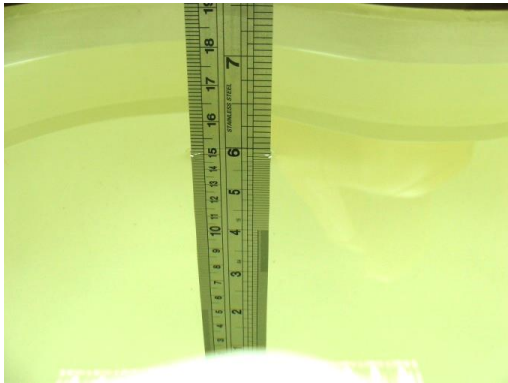


Fig 6.1 Photo of Liquid Height for Head SAR



Fig 6.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquid.

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (ϵ_r)
For Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
For Body								
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2
900	50.8	48.2	0	0.9	0.1	0	1.05	55.0
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3
2450	68.6	0	0	0	0	31.4	1.95	52.7

Table 6.1 Recipes of Tissue Simulating Liquid

Simulating Liquid for 5G, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an Agilent 85070D Dielectric Probe Kit and an Agilent Network Analyzer.

The following table shows the measuring results for simulating liquid.

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Date
835	Body	22.3	0.981	55.337	0.97	55.20	1.13	0.25	±5	2013/11/22
1900	Body	22.5	1.534	51.914	1.52	53.30	0.92	-2.60	±5	2013/11/21

Table 6.2 Measuring Results for Simulating Liquid

7. System Verification Procedures

Each DASy system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASy software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder.

7.1 Purpose of System Performance check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

7.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

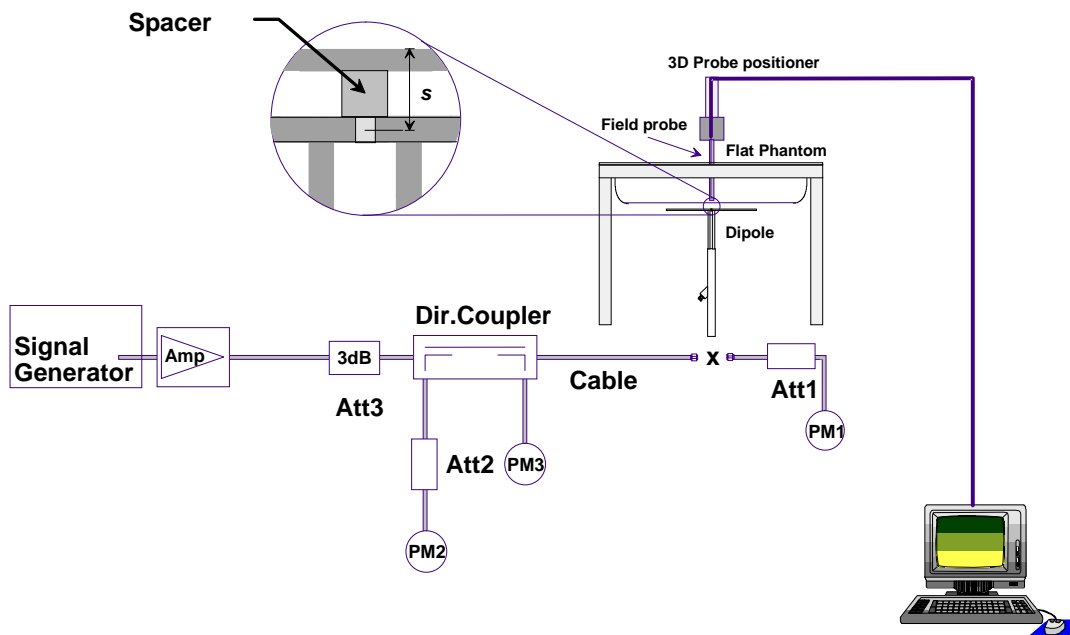


Fig 7.1 System Setup for System Evaluation

1. Signal Generator
2. Amplifier
3. Directional Coupler
4. Power Meter
5. Calibrated Dipole

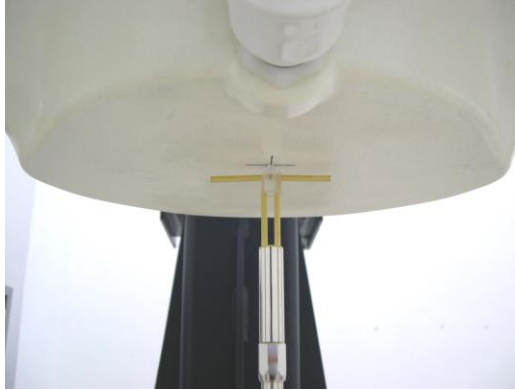


Fig 7.2 Photo of Dipole Setup

7.3 SAR System Verification Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Table 7.1 shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured SAR (W/kg)	Targeted SAR (W/kg)	Normalized SAR (W/kg)	Deviation (%)
2013/11/22	835	Body	250	D835V2-SN:499	3925	495	2.39	9.63	9.56	-0.73
2013/11/21	1900	Body	250	D1900V2-SN:5d041	3925	495	9.78	40.80	39.12	-4.12

Table 7.1 Target and Measurement SAR after Normalized

8. EUT Testing Position

Please refer to Appendix D for the test setup photos.

9. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

9.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

9.2 Power Reference Measurement

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

9.3 Area & Zoom Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r01 quoted below.

When the 1-g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.

		≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location		$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}		≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
		When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
<p>Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.</p> <p>* When zoom scan is required and the <i>reported</i> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.</p>			

9.4 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

9.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

9.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.

10. Conducted RF Output Power (Unit: dBm)

<GSM Conducted Power>

Band GSM850 TX Channel	Burst Average Power (dBm)			Tune-up Limit (dBm)	Frame-Average Power (dBm)			Tune-up Limit (dBm)
	128	189	251		128	189	251	
Frequency (MHz)	824.2	836.4	848.8		824.2	836.4	848.8	
GPRS (GMSK, 1 Tx slot)	32.26	32.29	32.19	33.00	23.26	23.29	23.19	24.00
GPRS (GMSK, 2 Tx slots)	31.23	31.26	31.16	33.00	25.23	25.26	25.16	27.00
EDGE (8PSK, 1 Tx slot)	26.47	26.47	26.40	28.00	17.47	17.47	17.40	19.00
EDGE (8PSK, 2 Tx slots)	26.46	26.47	26.39	28.00	20.46	20.47	20.39	22.00

Remark: The frame-averaged power is linearly scaled the maximum burst averaged power over 8 time slots.

The calculated method are shown as below:

Frame-averaged power = Maximum burst averaged power (1 Tx Slot) - 9 dB

Frame-averaged power = Maximum burst averaged power (2 Tx Slots) - 6 dB

Frame-averaged power = Maximum burst averaged power (3 Tx Slots) - 4.26 dB

Frame-averaged power = Maximum burst averaged power (4 Tx Slots) - 3 dB

Band GSM1900 TX Channel	Burst Average Power (dBm)			Tune-up Limit (dBm)	Frame-Average Power (dBm)			Tune-up Limit (dBm)
	512	661	810		512	661	810	
Frequency (MHz)	1850.2	1880	1909.8		1850.2	1880	1909.8	
GPRS (GMSK, 1 Tx slot)	29.34	29.67	29.81	31.00	20.34	20.67	20.81	22.00
GPRS (GMSK, 2 Tx slots)	28.28	28.61	28.74	30.00	22.28	22.61	22.74	24.00
EDGE (8PSK, 1 Tx slot)	25.56	25.85	26.00	27.00	16.56	16.85	17.00	18.00
EDGE (8PSK, 2 Tx slots)	25.51	25.81	25.95	27.00	19.51	19.81	19.95	21.00

Remark: The frame-averaged power is linearly scaled the maximum burst averaged power over 8 time slots.

The calculated method are shown as below:

Frame-averaged power = Maximum burst averaged power (1 Tx Slot) - 9 dB

Frame-averaged power = Maximum burst averaged power (2 Tx Slots) - 6 dB

Frame-averaged power = Maximum burst averaged power (3 Tx Slots) - 4.26 dB

Frame-averaged power = Maximum burst averaged power (4 Tx Slots) - 3 dB

<WCDMA Conducted Power>

The following tests were conducted according to the test requirements outlines in 3GPP TS 34.121 specification.

A summary of these settings are illustrated below:

HSDPA Setup Configuration:

- a. The EUT was connected to Base Station Agilent E5515C referred to the Setup Configuration.
- b. The RF path losses were compensated into the measurements.
- c. A call was established between EUT and Base Station with following setting:
 - i. Set Gain Factors (β_c and β_d) and parameters were set according to each
 - ii. Specific sub-test in the following table, C10.1.4, quoted from the TS 34.121
 - iii. Set RMC 12.2Kbps + HSDPA mode.
 - iv. Set Cell Power = -86 dBm
 - v. Set HS-DSCH Configuration Type to FRC (H-set 1, QPSK)
 - vi. Select HSDPA Uplink Parameters
 - vii. Set Delta ACK, Delta NACK and Delta CQI = 8
 - viii. Set Ack-Nack Repetition Factor to 3
 - ix. Set CQI Feedback Cycle (k) to 4 ms
 - x. Set CQI Repetition Factor to 2
 - xi. Power Ctrl Mode = All Up bits
- d. The transmitted maximum output power was recorded.

Table C.10.1.4: β values for transmitter characteristics tests with HS-DPCCH

Sub-test	β_c	β_d	β_d (SF)	β_c/β_d	β_{HS} (Note 1, Note 2)	CM (dB) (Note 3)	MPR (dB) (Note 3)
1	2/15	15/15	64	2/15	4/15	0.0	0.0
2	12/15 (Note 4)	15/15 (Note 4)	64	12/15 (Note 4)	24/15	1.0	0.0
3	15/15	8/15	64	15/8	30/15	1.5	0.5
4	15/15	4/15	64	15/4	30/15	1.5	0.5

Note 1: $\Delta_{ACK}, \Delta_{NACK}$ and $\Delta_{CQI} = 30/15$ with $\beta_{HS} = 30/15 * \beta_c$.

Note 2: For the HS-DPCCH power mask requirement test in clause 5.2C, 5.7A, and the Error Vector Magnitude (EVM) with HS-DPCCH test in clause 5.13.1A, and HSDPA EVM with phase discontinuity in clause 5.13.1AA, Δ_{ACK} and $\Delta_{NACK} = 30/15$ with $\beta_{HS} = 30/15 * \beta_c$, and $\Delta_{CQI} = 24/15$ with $\beta_{HS} = 24/15 * \beta_c$.

Note 3: CM = 1 for $\beta_c/\beta_d = 12/15$, $\beta_{HS}/\beta_c = 24/15$. For all other combinations of DPCCH, DPCCH and HS-DPCCH the MPR is based on the relative CM difference. This is applicable for only UEs that support HSDPA in release 6 and later releases.

Note 4: For subtest 2 the β_c/β_d ratio of 12/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to $\beta_c = 11/15$ and $\beta_d = 15/15$.

Setup Configuration

<WCDMA Conducted Power>

Band			WCDMA V			Tune-up Limit (dBm)	WCDMA II			Tune-up Limit (dBm)
TX Channel			4132	4182	4233		9262	9400	9538	
Rx Channel			4357	4407	4458		9662	9800	9938	
Frequency (MHz)			826.4	836.4	846.6		1852.4	1880	1907.6	
3GPP MPR (dB)	3GPP Rel 99	RMC 12.2Kbps	22.09	22.12	22.03	23.00	22.16	22.26	22.12	23.00
0	3GPP Rel 6	HSDPA Subtest-1	22.08	22.11	22.00	23.00	22.02	22.13	22.01	23.00
0	3GPP Rel 6	HSDPA Subtest-2	22.05	21.94	21.91	23.00	22.00	22.14	21.99	23.00
0.5	3GPP Rel 6	HSDPA Subtest-3	22.04	22.04	22.03	22.50	22.02	22.15	21.96	22.50
0.5	3GPP Rel 6	HSDPA Subtest-4	21.78	21.64	21.68	22.50	21.71	21.87	21.73	22.50

<WLAN 2.4GHz Conducted Power>

WLAN 2.4GHz 802.11b Average Power (dBm)							Tune up Limit (dBm)		
Power vs. Channel			Power vs. Data Rate			2Mbps		5.5Mbps	11Mbps
Channel	Frequency (MHz)	Data Rate							
		1Mbps							
CH 1	2412	16.82	16.76	16.86	16.79	17			
CH 6	2437	16.88							
CH 11	2462	16.71							

WLAN 2.4GHz 802.11g Average Power (dBm)										Tune up Limit (dBm)						
Power vs. Channel			Power vs. Data Rate						9Mbps		12Mbps	18Mbps	24Mbps	36Mbps	48Mbps	54Mbps
Channel	Frequency (MHz)	Data Rate														
		6Mbps														
CH 1	2412	11.42	14.89	14.87	14.91	14.43	14.40	13.68	13.59	11.5						
CH 6	2437	14.93								15						
CH 11	2462	11.88								12						

WLAN 2.4GHz 802.11n-HT20 Average Power (dBm)										Tune up Limit (dBm)						
Power vs. Channel			Power vs. MCS Index						MCS1		MCS2	MCS3	MCS4	MCS5	MCS6	MCS7
Channel	Frequency (MHz)	MCS Index														
		MCS0														
CH 1	2412	11.04	14.84	14.85	14.82	14.38	14.44	13.64	13.67	11.5						
CH 6	2437	14.87								15						
CH 11	2462	11.12								11.5						

11. Exposure Position Conditions

Distance of the Antenna to the EUT surface/edge						
Antennas	Front Face	Bottom Face	Edge1	Edge2	Edge3	Edge4
WWAN Antenna	≤ 25mm	≤ 25mm	≤ 25mm	≤ 25mm	151.00mm	62mm
WLAN Antenna	≤ 25mm	≤ 25mm	≤ 25mm	86mm	151.00mm	≤ 25mm

Positions for SAR tests, Test distance: 0.5 mm						
Antennas	Front Face	Bottom Face	Edge1	Edge2	Edge3	Edge4
WWAN Antenna	Yes	Yes	Yes	Yes	NO	NO
WLAN Antenna	Yes	Yes	Yes	NO	NO	Yes

Note:

1. This device of the diagonal is 198mm less than 200mm; more detail information please refers to setup photo.
2. Per KDB941225 D07v01r01, This type of mini-tablets is normally optimized for mobile web access and multimedia use. The test procedures are applicable to devices with a display and overall diagonal dimension ≤ 20 cm. UMPC mini-tablet devices must be tested for 1-g SAR on all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge, at 5 mm separation from a flat phantom, for the data modes, wireless technologies and frequency bands supported by the device to determine SAR compliance.

12. SAR Test Results

Note:

- Per KDB 447498 D01v05r01, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
Scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
- Tune-up scaling factor: to account for maximum tune-up tolerance limit.
- Transmission duty cycle: the highest average duty cycle from UBTF analysis.
- WWAN Reported SAR = (measured SAR) * (tune-up scaling factor) * (transmission duty cycle).
- According to the UBTF analysis exhibit, GSM, WCDMA and WLAN maximum tune-up power scaled down with the transmission factor is applied in standalone SAR test exclusion threshold analysis and is exempted from SAR testing.
- According to the UBTF analysis exhibit, HSDPA SAR is required, but per KDB 941225 D02v02r02, RMC 12.2kbps setting is used to evaluate SAR. If HSDPA output power is < 0.25dB higher than RMC, or reported SAR with RMC 12.2kbps setting is ≤ 1.2W/kg, HSDPA SAR evaluation can be excluded, therefore used RMC12.2Kbps to perform SAR testing and used HSDPA's transmission duty cycle to evaluation reported SAR.

12.1 Body SAR

<WCDMA V>

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Transmission Duty Cycle %	Reported 1g SAR (W/kg)
46	WCDMA V	RMC 12.2Kbps	Front Face	0.5cm	4182	836.4	22.12	23	1.225	-0.01	0.984	11.7	0.141
47	WCDMA V	RMC 12.2Kbps	Front Face	0.5cm	4132	826.4	22.09	23	1.233	-0.01	0.928	11.7	0.134
48	WCDMA V	RMC 12.2Kbps	Front Face	0.5cm	4233	846.6	22.03	23	1.250	-0.02	1.01	11.7	0.148
49	WCDMA V	RMC 12.2Kbps	Bottom Face	0.5cm	4182	836.4	22.12	23	1.225	-0.01	0.811	11.7	0.116
50	WCDMA V	RMC 12.2Kbps	Bottom Face	0.5cm	4132	826.4	22.09	23	1.233	0.04	0.778	11.7	0.112
51	WCDMA V	RMC 12.2Kbps	Bottom Face	0.5cm	4233	846.6	22.03	23	1.250	0	0.878	11.7	0.128
52	WCDMA V	RMC 12.2Kbps	Bottom Slant of Edge 1	0.5cm	4182	836.4	22.12	23	1.225	-0.04	1.1	11.7	0.158
53	WCDMA V	RMC 12.2Kbps	Bottom Slant of Edge 1	0.5cm	4132	826.4	22.09	23	1.233	-0.08	1.04	11.7	0.150
54	WCDMA V	RMC 12.2Kbps	Bottom Slant of Edge 1	0.5cm	4233	846.6	22.03	23	1.250	0	1.1	11.7	0.161
55	WCDMA V	RMC 12.2Kbps	Edge 1	0.5cm	4182	836.4	22.12	23	1.225	0.01	0.726	11.7	0.104
58	WCDMA V	RMC 12.2Kbps	Edge 2	0.5cm	4182	836.4	22.12	23	1.225	-0.02	0.134	11.7	0.019

<WCDMA II>

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Transmission Duty Cycle %	Reported 1g SAR (W/kg)
13	WCDMA II	RMC 12.2Kbps	Front Face	0.5cm	9400	1880	22.26	23	1.186	-0.04	2.44	11.7	0.338
14	WCDMA II	RMC 12.2Kbps	Front Face	0.5cm	9262	1852.4	22.16	23	1.213	-0.06	2.21	11.7	0.314
15	WCDMA II	RMC 12.2Kbps	Front Face	0.5cm	9538	1907.6	22.12	23	1.225	-0.07	2.38	11.7	0.341
16	WCDMA II	RMC 12.2Kbps	Bottom Face	0.5cm	9400	1880	22.26	23	1.186	0.02	1.37	11.7	0.190
17	WCDMA II	RMC 12.2Kbps	Bottom Face	0.5cm	9262	1852.4	22.16	23	1.213	0.03	1.3	11.7	0.185
18	WCDMA II	RMC 12.2Kbps	Bottom Face	0.5cm	9538	1907.6	22.12	23	1.225	-0.13	1.26	11.7	0.181
19	WCDMA II	RMC 12.2Kbps	Bottom Slant	0.5cm	9400	1880	22.26	23	1.186	0.02	2.93	11.7	0.406
20	WCDMA II	RMC 12.2Kbps	Bottom Slant	0.5cm	9262	1852.4	22.16	23	1.213	0.04	2.43	11.7	0.345
21	WCDMA II	RMC 12.2Kbps	Bottom Slant	0.5cm	9538	1907.6	22.12	23	1.225	-0.07	2.63	11.7	0.377
27	WCDMA II	RMC 12.2Kbps	Edge1	0.5cm	9400	1880	22.26	23	1.186	-0.03	2.79	11.7	0.387
28	WCDMA II	RMC 12.2Kbps	Edge1	0.5cm	9262	1852.4	22.16	23	1.213	-0.05	2.25	11.7	0.319
29	WCDMA II	RMC 12.2Kbps	Edge1	0.5cm	9538	1907.6	22.12	23	1.225	-0.02	2.63	11.7	0.377
30	WCDMA II	RMC 12.2Kbps	Edge2	0.5cm	9400	1880	22.26	23	1.186	-0.18	0.513	11.7	0.071

12.1 Repeated SAR Measurement

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Transmission Duty Cycle %	Measured 1g SAR (W/kg)	Ratio	Reported 1g SAR (W/kg)
52	WCDMA V	RMC 12.2Kbps	Bottom Slant	0.5cm	4182	836.4	22.12	23	1.225	-0.04	11.7	1.1		0.158
72	WCDMA V	RMC 12.2Kbps	Bottom Slant	0.5cm	4182	836.4	22.12	23	1.225	-0.08	11.7	1.05	1.04	0.150
19	WCDMA II	RMC 12.2Kbps	Bottom Slant	0.5cm	9400	1880	22.26	23	1.186	0.02	11.7	2.93		0.406
73	WCDMA II	RMC 12.2Kbps	Bottom Slant	0.5cm	9400	1880	22.26	23	1.186	0.02	11.7	2.89	1.013	0.401

Note:

1. Per KDB 865664 D01v01r02, for each frequency band, repeated SAR measurement is required only when the measured SAR is $\geq 0.8W/kg$
2. Per KDB 865664 D01v01r02, if the ratio among the repeated measurement is ≤ 1.2 and the measured SAR $< 1.45W/kg$, only one repeated measurement is required.
3. The ratio is the largest SAR to the smallest SAR among original and repeated measurement.
4. All measurement SAR result is scaled-up to account for tune-up tolerance and is compliant.

12.2 Highest SAR Plot

Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab

Date: 2013/11/22

#54_WCDMA V_RMC 12.2Kbps_Bottom Slant_0.5cm_Ch4233

Communication System: WCDMA; Frequency: 846.6 MHz; Duty Cycle: 1:1

Medium: MSL_850_131122 Medium parameters used: $f = 847$ MHz; $\sigma = 0.994$ S/m; $\epsilon_r = 55.278$; $\rho = 1000$ kg/m³

Ambient Temperature : 23.3 °C; Liquid Temperature : 22.3 °C

DASY5 Configuration:

- Probe: EX3DV4 - SN3925; ConvF(10.02, 10.02, 10.02); Calibrated: 2013/6/12;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn495; Calibrated: 2013/5/8
- Phantom: ELI v4.0; Type: QDOVA001BB; Serial: TP:1127
- Measurement SW: DASY52, Version 52.8 (6); SEMCAD X Version 14.6.9 (7117)

Configuration/Ch4233/Area Scan (71x41x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm
Maximum value of SAR (interpolated) = 1.28 W/kg

Configuration/Ch4233/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 39.530 V/m; Power Drift = 0.00 dB

Peak SAR (extrapolated) = 1.83 W/kg

SAR(1 g) = 1.1 W/kg; SAR(10 g) = 0.656 W/kg

Maximum value of SAR (measured) = 1.54 W/kg

Configuration/Ch4233/Zoom Scan (5x5x7)/Cube 1: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 39.530 V/m; Power Drift = 0.00 dB

Peak SAR (extrapolated) = 1.79 W/kg

SAR(1 g) = 1.03 W/kg; SAR(10 g) = 0.600 W/kg

Maximum value of SAR (measured) = 1.47 W/kg

#19_WCDMA II_RMC 12.2Kbps_Bottom Slant_0.5cm_Ch9400

Communication System: WCDMA; Frequency: 1880 MHz; Duty Cycle: 1:1
 Medium: MSL_1900_131121 Medium parameters used: $f = 1880$ MHz; $\sigma = 1.511$ S/m; $\epsilon_r = 51.934$; $\rho = 1000$ kg/m³

Ambient Temperature : 23.5 °C; Liquid Temperature : 22.5 °C

DASY5 Configuration:

- Probe: EX3DV4 - SN3925; ConvF(7.91, 7.91, 7.91); Calibrated: 2013/6/12;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn495; Calibrated: 2013/5/8
- Phantom: ELI v4.0; Type: QDOVA001BB; Serial: TP:1127
- Measurement SW: DASY52, Version 52.8 (6); SEMCAD X Version 14.6.9 (7117)

Configuration/Ch9400/Area Scan (71x41x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm
 Maximum value of SAR (interpolated) = 3.55 W/kg

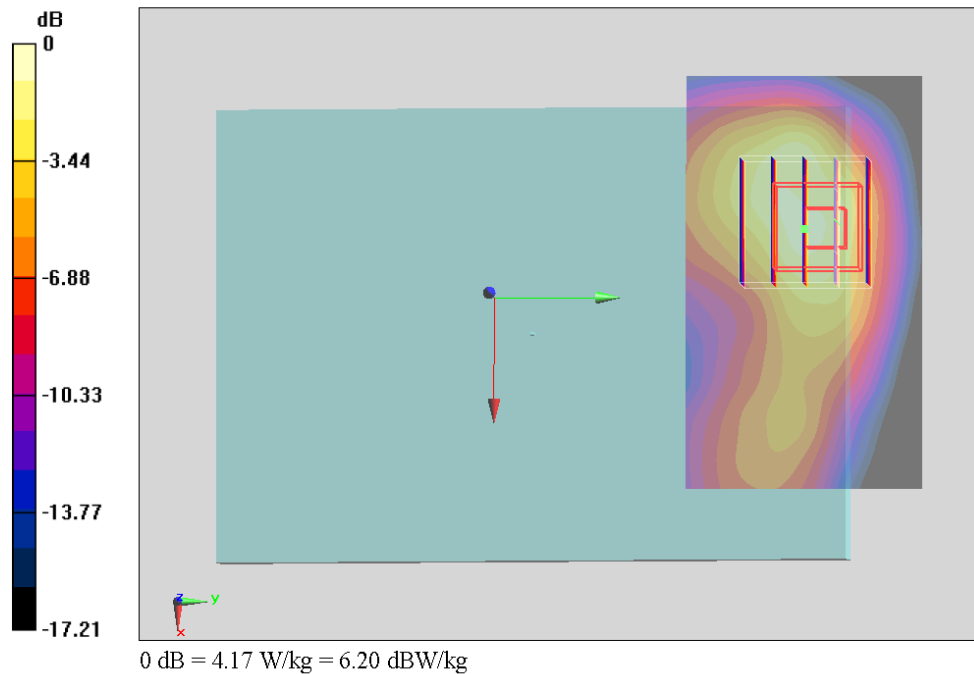
Configuration/Ch9400/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 49.168 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 5.66 W/kg

SAR(1 g) = 2.93 W/kg; SAR(10 g) = 1.52 W/kg

Maximum value of SAR (measured) = 4.17 W/kg



13. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Support
1.	GPRS/EDGE(Data) + WLAN2.4GHz(data)	No
2.	WCDMA(Data) + WLAN2.4GHz(data)	No

Test Engineer : San Lin and Bevis Chang

14. Uncertainty Assessment

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in Table 14.1

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor ^(a)	1/k ^(b)	1/√3	1/√6	1/√2

(a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity

(b) k is the coverage factor

Table 14.1. Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASy uncertainty Budget is shown in the following tables.

Error Description	Uncertainty Value ($\pm\%$)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)
Measurement System							
Probe Calibration	6.0	Normal	1	1	1	$\pm 6.0\%$	$\pm 6.0\%$
Axial Isotropy	4.7	Rectangular	$\sqrt{3}$	0.7	0.7	$\pm 1.9\%$	$\pm 1.9\%$
Hemispherical Isotropy	9.6	Rectangular	$\sqrt{3}$	0.7	0.7	$\pm 3.9\%$	$\pm 3.9\%$
Boundary Effects	1.0	Rectangular	$\sqrt{3}$	1	1	$\pm 0.6\%$	$\pm 0.6\%$
Linearity	4.7	Rectangular	$\sqrt{3}$	1	1	$\pm 2.7\%$	$\pm 2.7\%$
System Detection Limits	1.0	Rectangular	$\sqrt{3}$	1	1	$\pm 0.6\%$	$\pm 0.6\%$
Readout Electronics	0.3	Normal	1	1	1	$\pm 0.3\%$	$\pm 0.3\%$
Response Time	0.8	Rectangular	$\sqrt{3}$	1	1	$\pm 0.5\%$	$\pm 0.5\%$
Integration Time	2.6	Rectangular	$\sqrt{3}$	1	1	$\pm 1.5\%$	$\pm 1.5\%$
RF Ambient Noise	3.0	Rectangular	$\sqrt{3}$	1	1	$\pm 1.7\%$	$\pm 1.7\%$
RF Ambient Reflections	3.0	Rectangular	$\sqrt{3}$	1	1	$\pm 1.7\%$	$\pm 1.7\%$
Probe Positioner	0.4	Rectangular	$\sqrt{3}$	1	1	$\pm 0.2\%$	$\pm 0.2\%$
Probe Positioning	2.9	Rectangular	$\sqrt{3}$	1	1	$\pm 1.7\%$	$\pm 1.7\%$
Max. SAR Eval.	1.0	Rectangular	$\sqrt{3}$	1	1	$\pm 0.6\%$	$\pm 0.6\%$
Test Sample Related							
Device Positioning	2.9	Normal	1	1	1	$\pm 2.9\%$	$\pm 2.9\%$
Device Holder	3.6	Normal	1	1	1	$\pm 3.6\%$	$\pm 3.6\%$
Power Drift	5.0	Rectangular	$\sqrt{3}$	1	1	$\pm 2.9\%$	$\pm 2.9\%$
Phantom and Setup							
Phantom Uncertainty	4.0	Rectangular	$\sqrt{3}$	1	1	$\pm 2.3\%$	$\pm 2.3\%$
Liquid Conductivity (Target)	5.0	Rectangular	$\sqrt{3}$	0.64	0.43	$\pm 1.8\%$	$\pm 1.2\%$
Liquid Conductivity (Meas.)	2.5	Normal	1	0.64	0.43	$\pm 1.6\%$	$\pm 1.1\%$
Liquid Permittivity (Target)	5.0	Rectangular	$\sqrt{3}$	0.6	0.49	$\pm 1.7\%$	$\pm 1.4\%$
Liquid Permittivity (Meas.)	2.5	Normal	1	0.6	0.49	$\pm 1.5\%$	$\pm 1.2\%$
Combined Standard Uncertainty						$\pm 11.0\%$	$\pm 10.8\%$
Coverage Factor for 95 %						K=2	
Expanded Uncertainty						$\pm 22.0\%$	$\pm 21.5\%$

Table 14.2. Uncertainty Budget for frequency range 300 MHz to 3 GHz

15. References

- [1] FCC 47 CFR Part 2 “Frequency Allocations and Radio Treaty Matters; General Rules and Regulations”
- [2] ANSI/IEEE Std. C95.1-1992, “IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz”, September 1992
- [3] IEEE Std. 1528-2003, “Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques”, December 2003
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 447498 D01 v05r01, “Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies”, May 2013
- [6] FCC KDB 941225 D03 v01, “Recommended SAR Test Reduction Procedures for GSM / GPRS / EDGE”, December 2008
- [7] FCC KDB 941225 D01 v02, “SAR Measurement Procedures for 3G Devices – CDMA 2000 / Ev-Do / WCDMA / HSDPA / HSPA”, October 2007
- [8] FCC KDB 941225 D02 v02r02, “SAR Guidance for HSPA, HSPA+, DC-HSDPA and 1x-Advanced”, May 2013.
- [9] FCC KDB 941225 D07 v01r01, " SAR Evaluation Procedures for UMPC Mini-Tablet Devices", May 2013