SAR EVALUATION REPORT

For

VeriFone Inc.

3755 Atherton Road Rocklin, CA 95765

FCC ID: B32ONMI3600D

Note: This test report is specially limited to the above client company and the product model only. It may not be duplicated without prior written consent of Bay Area Compliance Laboratory Corporation.This report **must not** be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government.

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SUMMARY

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996 [1].

The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). According to the Supplement C of OET Bulletin 65 "Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in North America is 1.6 mW/g average over 1 gram of tissue mass.

The test configurations were laid out on a specially designed test fixture to ensure the reproducibility of measurements. Each configuration was scanned for SAR. Analysis of each scan was carried out to characterize the above effects in the device.

There was no SAR of any concern measured on the device for any of the investigated configurations.

Summary of the Worst Case SAR values for head and body:

Ambient Temperature (ºC): 23.0 Relative Humidity (%): 42.0

1 - REFERENCE

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[4] Niels Kuster, Ralph K.astle, and Thomas Schmid, \Dosimetric evaluation of mobile communications equipment with known precision", IEICE Transactions on Communications, vol. E80-B, no. 5, pp. 645{652, May 1997.

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[6] ANSI, ANSI/IEEE C95.1-1992: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992.

[7] Katja Pokovic, Thomas Schmid, and Niels Kuster, \Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies", in ICECOM _ 97, Dubrovnik, October 15{17, 1997, pp. 120-24.

[8] Katja Pokovic, Thomas Schmid, and Niels Kuster, \E-field probe with improved isotropy in brain simulating liquids", in Proceedings of the ELMAR, Zadar, Croatia, 23{25 June, 1996, pp. 172-175.

[9] Volker Hombach, Klaus Meier, Michael Burkhardt, Eberhard K. uhn, and Niels Kuster, \The depen-dence of EM energy absorption upon human head modeling at 900 MHz", IEEE Transactions on Microwave Theory and Techniques, vol. 44, no. 10, pp. 1865-1873, Oct. 1996.

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[13] NIS81 NAMAS, \The treatment of uncertainity in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddington, Middlesex, England, 1994.

[14] Barry N. Taylor and Christ E. Kuyatt, \Guidelines for evaluating and expressing the uncertainty of NIST measurement results", Tech. Rep., National Institute of Standards and Technology, 1994. Dosimetric Evaluation of Sample device, month 1998 10

2 - TESTING EQUIPMENT

2.1 Equipments List & Calibration Info

2.2 Equipment Calibration Certificate

Please see the attached file for detailed information.

Schmid & Partner **Engineering AG**

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

Calibration Certificate

Dosimetric E-Field Probe

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

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

Calibrated by

D. Vellen

Approved by:

Schmid & Partner Engineering AG

Zeughausstrasse 43, 8004 Zurich, Switzerland, Telephone +411 245 97 00, Fax +411 245 97 79

Probe ET3DV6

SN:1604

Manufactured: Last calibration: Recalibrated:

July 30, 2001 September 7, 2001 August 26, 2002

Calibrated for System DASY3

Sensitivity in Free Space

August 26, 2002

DASY3 - Parameters of Probe: ET3DV6 SN:1604

Diode Compression

Sensitivity in Tissue Simulating Liquid

Boundary Effect

August 26, 2002

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

August 26, 2002

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

August 26, 2002

August 26, 2002

August 26, 2002

Conversion Factor Assessment

 $.........$

August 26, 2002

Conversion Factor Assessment

August 26, 2002

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

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

Additional Conversion Factors for Dosimetric E-Field Probe

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

Assessed by

Dean Koty

Conversion factor $(\pm$ standard deviation)

835MHz Body Liquid Validation

9/24/2003
Homer

$$
\sigma = \omega \varepsilon_0 \varepsilon'' = 2 \pi f \varepsilon_0 \varepsilon'' = 0.973
$$

where $f = 835 \times 10^6$
 $\varepsilon_0 = 8.854 \times 10^{-12}$
 $\varepsilon'' = 20.9377$

835 MHz Body Liquid Validation

835MHz Head Liquid Validation

7

835 MHz Head Liquid validation

 $\mathbf{1}$

1900MHz Body Liquid Validation

 $\frac{1}{29/2005}$

$$
\sigma = \omega \varepsilon_0 \varepsilon'' = 2 \pi f \varepsilon_0 \varepsilon'' = 1.562
$$

where $f = 1900 \times 10^6$
 $\varepsilon_0 = 8.854 \times 10^{-12}$
 $\varepsilon'' = 14.7790$

1900MHz Head Liquid Validation

9/29/2001

$$
\sigma = \omega \, \varepsilon_o \, \varepsilon'' = 2 \, \pi f \, \varepsilon_o \, \varepsilon'' = 1.434
$$
\n
$$
\text{where } f = 1900 \, \text{x} \, 10^6
$$
\n
$$
\varepsilon_o = 8.854 \, \text{x} \, 10^{-12}
$$
\n
$$
\varepsilon'' = 13.5644
$$

3 - EUT DESCRIPTION

4 - SYSTEM TEST CONFIGURATION

4.1 Justification

The system was configured for testing in a typical fashion (as normally used by a typical user).

4.2 EUT Exercise Procedure

The EUT exercising program used during SAR testing was designed to exercise the various system components in a manner similar to a typical use.

4.3 Equipment Modifications

No modification(s) were made to ensure that the EUT complies with the applicable limits.

5 – CONDUCTED OUTPUT POWER MEASUREMENTS

5.1 Provision Applicable

According to §15.247(b) (3), for systems using digital modulation, the maximum peak output power of the intentional radiator shall not exceed 1 Watt.

According to FCC §22.913 (a), the ERP of mobile transmitters and auxiliary test transmitters must not exceed 7 watts. According to FCC § 24.232(b), EIRP peak power for mobile/portable stations are limited to 2 watts.

5.2 Test Procedure

The RF output of the transmitter was connected to the input of the spectrum analyzer through sufficient attenuation.

5.3 Test equipment

Hewlett Packard HP8564E Spectrum Analyzer, Calibration Due Date: 2004-08-01. Hewlett Packard HP 7470A Plotter, Calibration not required. A.H. Systems SAS200 Horn Antenna, Calibration Due Date: 2004-05-31 Com-Power AB-100 Dipole Antenna, Calibration Due Date: 2004-09-05

5.4 Test Results

Please refer to the following plots.

$Monea 9/24/2003$

 $MomG = 9/14/2003$

CENTER 848.19MHZ

 $\sqrt{1000}$ $9/29/2003$

None 9/24/2003

 $Mow2 \frac{a}{2} \pi \frac{1}{2003}$

Mona 9/29/2003

6 - DOSIMETRIC ASSESSMENT SETUP

These measurements were performed with the automated near-field scanning system DASY3 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9m) which positions the probes with a positional repeatability of better than ± 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The system is described in detail in [3].

The SAR measurements were conducted with the dosimetric probe ET3DV6 SN: 1577 (manufactured by SPEAG), designed in the classical triangular configuration [3] and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure described in [7] with accuracy of better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure described in [8] and found to be better than ± 0.25 dB.

The phantom used was the \Generic Twin Phantom" described in [4]. The ear was simulated as a spacer of 4 mm thickness between the earpiece of the phone and the tissue simulating liquid. The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

6.1 Measurement System Diagram

The DASY3 system for performing compliance tests consist of the following items:

- 1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software.
- 2. An arm extension for accommodating the data acquisition electronics (DAE).
- 3. A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- 4. A data acquisition electronic (DAE), which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- 5. A unit to operate the optical surface detector, which is connected to the EOC. The Electro-optical coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the PC plug-in card. The functions of the PC plug-in card based on a DSP is to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
- 6. A computer operating Windows 95 or larger
- 7. DASY3 software
- 8. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
- 9. The generic twin phantom enabling testing left-hand and right-hand usage.
- 10. The device holder for handheld EUT.
- 11. Tissue simulating liquid mixed according to the given recipes (see Application Note).
- 12. System validation dipoles to validate the proper functioning of the system.

6.2. System Components

ET3DV6 Probe Specification

Construction Symmetrical design with triangular core Built-in optical fiber for surface detection System Built-in shielding against static charges Calibration In air from 10 MHz to 2.5 GHz In brain and muscle simulating tissue at Frequencies of 450 MHz, 900 MHz and 1.8 GHz (accuracy \pm 8%) Frequency 10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz) Directivity \pm 0.2 dB in brain tissue (rotation around probe axis) \pm 0.4 dB in brain tissue (rotation normal probe axis) Dynamic 5 mW/g to > 100 mW/g; Range Linearity: \pm 0.2 dB $Surface \pm 0.2$ mm repeatability in air and clear liquids **Photograph of the probe** Detection over diffuse reflecting surfaces. Dimensions Overall length: 330 mm Tip length: 16 mm Body diameter: 12 mm Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm Application General dosimetric up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms

The SAR measurements were conducted with the dosimetric probe ET3DV6 designed in the classical triangular configuration 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 multi-fiber line ending at the front of the probe tip. 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 DASY3 software reads the reflection during a software approach and looks for the maximum using a 2 nd **Inside view of** order fitting. The approach is stopped when reaching the maximum. **ET3DV6 E-field Probe**

E-Field Probe Calibration Process

Each probe is calibrated according to a dosimetric assessment procedure described in [6] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [7] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies bellow 1 GHz, 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 and at the proper orientation with the field. The probe is then rotated 360 degrees.

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

Data Evaluation

The DASY3 software 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:

These parameters must be set correctly in the software. They can either be found in the component documents or be imported into the software from the configuration files issued for the DASY3 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:

$$
Vi = Ui + (Ui)^2 cf / dcp_i
$$

With Vi = compensated signal of channel i $(i = x, y, z)$

- Ui = input signal of channel i $(i = x, y, z)$
- cf = crest factor of exciting field (\overrightarrow{DASY} parameter)
- dcp_i = diode compression point (DASY parameter)

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

E-field probes:
\n
$$
E_{i} = \sqrt{\frac{V_{i}}{Norm_{i} \cdot ConvF}}
$$
\nH-field probes:
\n
$$
H_{t} = \sqrt{Vi} \cdot \frac{di\phi + \frac{di\phi}{f} + \frac{di\phi}{f}}{f}
$$

With Vi = compensated signal of channel i $(i = x, y, z)$ Norm_i = sensor sensitivity of channel i $(i = x, y, z)$ μ V/ (V/m)² for E-field probes $ConF =$ sensitivity enhancement in solution a_{ij} = sensor sensitivity factors for H-field probes
 f = carrier frequency [GHz]

 $=$ carrier frequency [GHz]

 Ei = electric field strenggy of channel i in V/m

 H_i = diode compression point (DASY parameter)

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

 $E_{\text{tot}} = \text{Square Root} [(E_x)^2 + (E_y)^2 + (E_z)^2]$

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

$$
SAR = (E_{tot})^2 \cdot \sigma / (\rho \cdot 1000)
$$

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 normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

The power flow density is calculated assuming the excitation field as a free space field.

$$
P_{\text{pwe}} = (E_{\text{tot}})^2 / 3770
$$
 or $P_{\text{pwe}} = (H_{\text{tot}})2 \cdot 37.7$

With P_{pwe} = equivalent power density of a plane wave in mW/cm3

 \vec{E}_{tot} = total electric filed strength in V/m

 H_{tot} = total magnetic filed strength in V/m

Generic Twin Phantom

The Generic Twin Phantom 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 [9][10]. 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 allows the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. Shell Thickness 2 ± 0.1 mm Filling Volume Approx. 20 liters Dimensions 810 x 1000 x 500 mm (H x L x W)

Generic Twin Phantom

Device Holder

In combination with the Generic Twin Phantom V3.0, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC 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 produced infinite number of configurations [10]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests. **Device Holder**

6.3 Measurement Uncertainty

The uncertainty budget has been determined for the DASY3 measurement system according to the NIS81 [13] and the NIST1297 [14] documents and is given in the following Table.