DECLARATION OF COMPLIANCE
SAR EVALUATION

Test Lab

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Applicant Information

COBRA ELECTRONICS CORPORATION
6500 West Cortland Street
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Rule Part(s):	**FCC 47 CFR §2.1093**
Test Procedure(s):	**FCC OET Bulletin 65, Supplement C (01-01)**
Device Type:	**Portable UHF GMRS/FRS PTT Radio Transceiver**
FCC ID:	**BBOPR945**
Model(s):	**PR-945**
Modulation:	**FM (UHF)**
Tx Frequency Range(s):	**462.5500 - 462.7250 MHz (GMRS Channels 15-22)** **462.5625 - 462.7125 MHz (FRS/GMRS Channels 1-7)** **467.5625 - 467.7125 MHz (FRS Channels 8-14)**
RF Output Power Tested:	**1.3 Watts ERP (GMRS)**
No. of Channels:	**22**
Antenna Type(s):	**Fixed**
Battery Type(s):	**1.5V AAA Alkaline (x4)**
Body-Worn Accessories:	**Belt-Clip (0.7 cm)** **Lapel Ear-Microphone (MA-EBM)** **Boom-Microphone Headset (MA-VOX)**
Max. SAR Measured:	**0.895 W/kg - Face-held (50% duty cycle)** **1.09 W/kg - Body-worn (50% duty cycle)**

Celltech Research Inc. declares under its sole responsibility that this device was found to be in compliance with the Specific Absorption Rate (SAR) RF exposure requirements specified in FCC 47 CFR §2.1093. The device was tested in accordance with the measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C, Edition 01-01 (General Population / Uncontrolled Exposure).

I attest to the accuracy of data. All measurements 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.

Russell W. Pipe
Senior Compliance Technologist
Celltech Research Inc.

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1.0 INTRODUCTION

This measurement report demonstrates compliance of the Cobra Electronics Corporation Model: PR-945 Portable UHF GMRS/FRS PTT Radio Transceiver FCC ID: BBOPR945 with the rules and requirements of FCC 47 CFR §2.1093 (see reference [1]) for the General Population / Uncontrolled Exposure environment. The test procedures described in FCC OET Bulletin 65, Supplement C, Edition 01-01 (see reference [2]) were employed. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the evaluation, equipment used, and the various provisions of the rules are included within this test report.

2.0 DESCRIPTION of Device Under Test (DUT)

Rule Part(s)	FCC 47 CFR §2.1093
Test Procedure	FCC OET Bulletin 65, Supplement C (01-01)
Device Type	Portable UHF GMRS/FRS PTT Radio Transceiver
FCC ID	BBOPR945
Model(s)	PR-945
Serial No.	Pre-production
Modulation	FM (UHF)
Tx Frequency Range	462.5500 - 462.7250 MHz (GMRS Channels 15-22) 462.5625 - 462.7125 MHz (FRS/GMRS Channels 1-7) 467.5625 - 467.7125 MHz (FRS Channels 8-14)
RF Output Power Tested	1.3 Watts ERP (GMRS)
Battery Type(s)	1.5V AAA Alkaline (x4)
Antenna Type(s)	Fixed
Body-Worn Accessories Tested	Belt-Clip (0.7 cm) Lapel Ear-Microphone (MA-EBM) Boom-Microphone Headset (MA-VOX)

3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, specific anthropomorphic mannequin (SAM) phantom, and various planar phantoms for brain and/or body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit 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. The DAE3 utilizes 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.

DASY3 SAR Measurement System with SAM Phantom

DASY3 SAR Measurement System with validation phantom

4.0 MEASUREMENT SUMMARY

The measurement results were obtained with the DUT tested in the conditions described in this report. Detailed measurement data and plots showing the maximum SAR location of the DUT are reported in Appendix A.

SAR EVALUATION RESULTS

GMRS Freq. (MHz)	Chan.	Mode	RF Output Power (ERP)	Power Drift (dB)	Antenna Position	Battery Type	Accessory Type	Separation Distance (cm)	Fluid Type	SAR (W/kg)	
										100% Duty Cycle	50% Duty Cycle
462.6250	18	CW	1.3 W	-0.11	Fixed	Alkaline	(Face-Held)	2.5	Brain	1.79	0.895
462.6250	18	CW	1.3 W	-0.03	Fixed	Alkaline	Belt-Clip Ear-Mic	0.7	Body	2.17	1.09
462.6250	18	CW	1.3 W	-0.03	Fixed	Alkaline	Belt-Clip Boom-Mic	0.7	Body	1.82	0.910

ANSI / IEEE C95.1 1992 - SAFETY LIMIT
Spatial Peak - Uncontrolled Exposure / General Population
BRAIN & BODY: 1.6 W/kg / (averaged over 1 gram)

	Brain 450MHz		Body 450MHz			
Dielectric Constant	IEEE Target	Measured	IEEE Target	Measured	Atmospheric Pressure	101.3 kPa
	43.5 (+/- 5%)	44.3	**56.7** (+/- 5%)	59.0	Relative Humidity	46 %
					Ambient Temperature	23.1 °C
Conductivity	Brain 450MHz		Body 450MHz		Fluid Temperature	22.3 °C
	IEEE Target	Measured	IEEE Target	Measured	Fluid Depth	≥ 15 cm
	0.87 (+/- 5%)	0.86	**0.94** (+/- 5%)	0.96	Phantom Section	Planar

Note(s):

1. The transmission band of the DUT is less than 10 MHz, therefore mid channel data only is reported (per FCC OET Bulletin 65, Supplement C, Edition 01-01 - see reference [2]).
2. The ambient and fluid temperatures were measured prior to, and during, the fluid dielectric parameter check and the SAR evaluation. The temperatures listed in the table above were consistent for all measurement periods.

5.0 DETAILS OF SAR EVALUATION

The Cobra Electronics Corporation Model: PR-945 Portable UHF GMRS/FRS PTT Radio Transceiver FCC ID: BBOPR945 was found to be compliant for localized Specific Absorption Rate (Uncontrolled Exposure) based on the test provisions and conditions described below. The detailed test setup photographs are shown in Appendix G.

1. The DUT was evaluated in a face-held configuration with the front of the device placed parallel to the outer surface of the SAM planar phantom. A 2.5 cm separation distance was maintained between the front side of the DUT and the outer surface of the SAM planar phantom for the duration of the tests.
2. The DUT was tested in a body-worn configuration with the back of the device placed parallel to the outer surface of the SAM planar phantom. The attached belt-clip was positioned touching the planar phantom and provided a 0.7 cm separation distance between the back of the DUT and the outer surface of the SAM planar phantom. The DUT was evaluated for body-worn SAR with the lapel ear-microphone and boom-microphone headset accessories connected.
3. The DUT was operated for an appropriate period prior to the evaluation in order to minimize power drift.
4. The DUT was evaluated for SAR at the maximum ERP measured by signal substitution method.
5. The DUT was tested in unmodulated continuous transmit operation (Continuous Wave mode at 100% duty cycle) with the transmit button constantly depressed. The 50% duty cycle compensation reported for this push-to-talk device assumes a transmit/receive cycle of equal time base.
6. The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the device and its antenna.
7. The DUT was tested with fully charged alkaline batteries.

6.0 EVALUATION PROCEDURES

a. (i) The evaluation was performed in the applicable area of the phantom depending on the type of device being tested. For devices held to the ear during normal operation, both the left and right ear positions were evaluated in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01) using the SAM phantom.

(ii) For body-worn and face-held devices a planar phantom was used.

b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.

c. Based on the area scan data, the area of maximum absorption was determined by spline interpolation. Around this point, a volume of 40 x 40 x 35 mm (fine resolution volume scan, zoom scan) was assessed by measuring 5 x 5 x 7 points.

d. The 1g and 10g spatial peak SAR was determined as follows:

1. The first step was an extrapolation to find the points between the dipole center of the probe and the surface of the phantom. This data cannot be measured, since the center of the dipoles is 2.7 mm away form the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm (see probe calibration document in Appendix D). The extrapolation was based on a least square algorithm [W. Gander, Computermathematik, p.168-180] (see reference [4]). Through the points in the first 3 cm in all z-axis, polynomials of the fourth order were calculated. This polynomial was then used to evaluate the points between the surface and the probe tip.

2. The next step used 3D-spline interpolation to get all points within the measured volume in a 1mm grid (35000 points). The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition [W. Gander, Computermathematik, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff] (see reference [4]).

3. The maximal interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-spline interpolation algorithm. 8000 points (20x20x20) were interpolated to calculate the average.

EVALUATION PROCEDURES (Cont.)

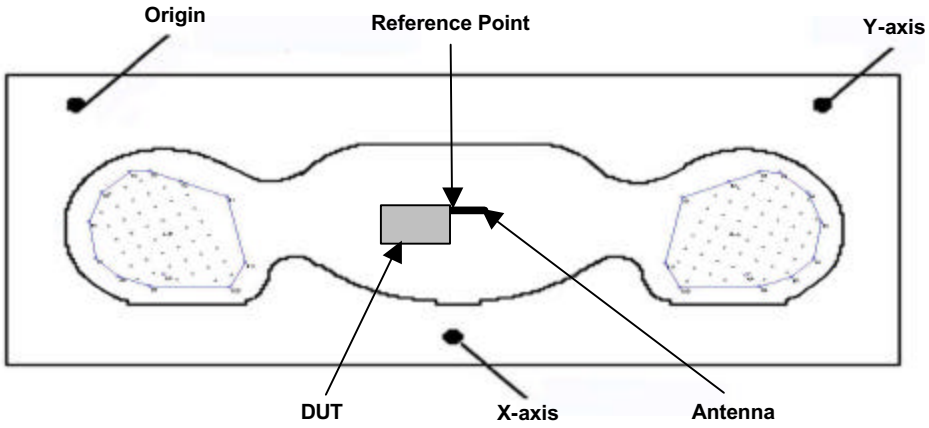


Figure 1. Phantom Reference Point & DUT Positioning (Face-held)

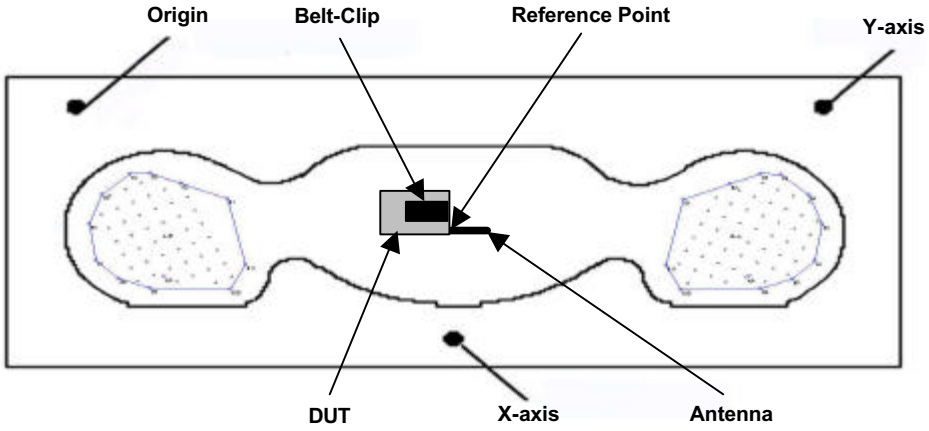


Figure 2. Phantom Reference Point & DUT Positioning (Body-worn)

7.0 SYSTEM PERFORMANCE CHECK

Prior to the evaluation a system check was performed with a planar phantom and a 450MHz dipole (see Appendix C for system validation procedures). The dielectric parameters of the simulated tissue fluids were measured prior to the validation using an 85070C Dielectric Probe Kit and an 8753E Network Analyzer (see Appendix E for printout of measured fluid dielectric parameters). A forward power of 250mW was applied to the dipole and system was verified to a tolerance of ±10% (see Appendix B for system check test plot).

SYSTEM PERFORMANCE CHECK											
Test Date	Equiv. Tissue	SAR 1g (W/kg)		Dielectric Constant ε_r		Conductivity σ (mho/m)		ρ (Kg/m^3)	Ambient Temp.	Fluid Temp.	Fluid Depth
		IEEE Target	Measured	IEEE Target	Measured	IEEE Target	Measured				
12/20/02	450MHz (Brain)	**1.23 ±10%**	1.28	**43.5 ±5%**	44.3	**0.87 ±5%**	0.86	1000	23.1 °C	22.3 °C	≥ 15 cm

Note(s):
1. The ambient and fluid temperatures were measured prior to, and during, the fluid dielectric parameter check and the system performance check. The temperatures listed in the table above were consistent for all measurement periods.

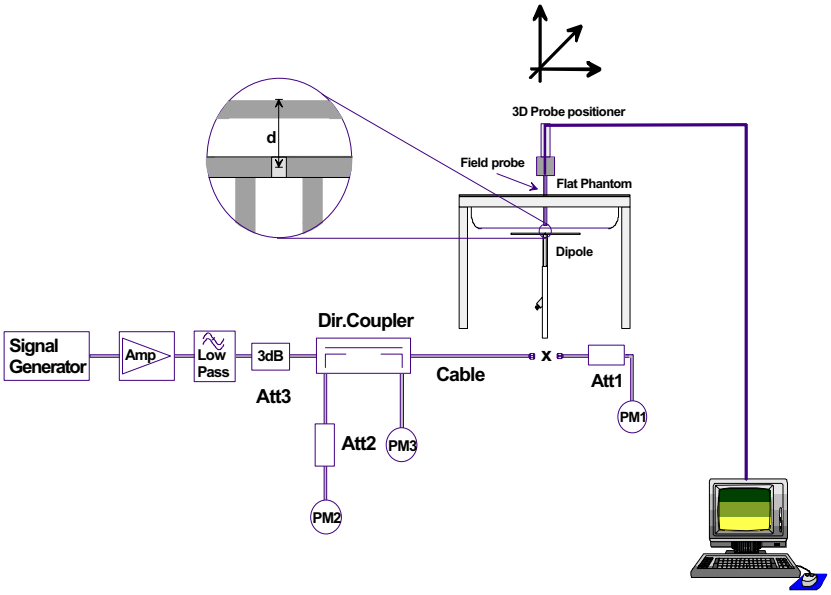


Figure 3. System Check Setup Diagram

450MHz System Check Setup Photograph

8.0 SIMULATED TISSUES

The 450MHz brain and body simulated tissue mixtures consist of a viscous gel using hydroxethylcellulose (HEC) gelling agent and saline solution. Preservation with a bactericide is added and visual inspection is made to ensure air bubbles are not trapped during the mixing process. The fluid was prepared according to standardized procedures, and measured for dielectric parameters (permittivity and conductivity).

TISSUE MIXTURES		
INGREDIENT	**450MHz Brain (System Check & DUT Evaluation)**	**450MHz Body (DUT Evaluation)**
Water	38.56 %	52.00 %
Sugar	56.32 %	45.65 %
Salt	3.95 %	1.75 %
HEC	0.98 %	0.50 %
Bactericide	0.19 %	0.10 %

9.0 SAR SAFETY LIMITS

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	**(Occupational / Controlled Exposure Environment)**
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1g of tissue)	1.60	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10g)	4.0	20.0

Notes:
1. Uncontrolled environments are defined as locations where there is potential exposure of individuals who have no knowledge or control of their potential exposure.
2. Controlled environments are defined as locations where there is potential exposure of individuals who have knowledge of their potential exposure and can exercise control over their exposure.

10.0 ROBOT SYSTEM SPECIFICATIONS

Specifications

POSITIONER:	Stäubli Unimation Corp. Robot Model: RX60L
Repeatability:	0.02 mm
No. of axis:	6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor:	Pentium III
Clock Speed:	450 MHz
Operating System:	Windows NT
Data Card:	DASY3 PC-Board

Data Converter

Features:	Signal Amplifier, multiplexer, A/D converter, and control logic
Software:	DASY3 software
Connecting Lines:	Optical downlink for data and status info. Optical uplink for commands and clock

PC Interface Card

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

E-Field Probe

Model:	ET3DV6
Serial No.:	1387
Construction:	Triangular core fiber optic detection system
Frequency:	10 MHz to 6 GHz
Linearity:	± 0.2 dB (30 MHz to 3 GHz)

Evaluation Phantom

Type:	SAM V4.0C
Shell Material:	Fiberglass
Thickness:	2.0 ±0.1 mm
Volume:	Approx. 20 liters

Validation Phantom (for devices ≤ 450MHz)

Type:	Large Planar Phantom
Shell Material:	Plexiglas
Bottom Thickness:	6.2 mm ± 0.1mm
Dimensions:	83.5 cm (L) x 36.9 cm (W) x 21.8 cm (H)

11.0 PROBE SPECIFICATION (ET3DV6)

Construction:	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g. glycol)
Calibration:	In air from 10 MHz to 2.5 GHz In brain simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy ± 8%)
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Directivity:	± 0.2 dB in brain tissue (rotation around probe axis) ± 0.4 dB in brain tissue (rotation normal to probe axis)
Dynam. Rnge:	5 µW/g to > 100 mW/g; Linearity: ± 0.2 dB
Srfce. Detect.	± 0.2 mm repeatability in air and clear liquids 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 dosimetry up to 3 GHz Compliance tests of mobile phone

ET3DV6 E-Field Probe

12.0 LARGE PLANAR PHANTOM

The large planar phantom is constructed of Plexiglas material with a 6.0 mm shell thickness for SAR validations at and below 450MHz. The large planar phantom is mounted in the DASY3 compact system in place of the SAM phantom.

Large Planar Phantom

13.0 SAM PHANTOM V4.0C

The SAM phantom V4.0C is a fiberglass shell phantom with a 2.0mm shell thickness for left and right head and flat planar area integrated in a wooden table. The shape of the fiberglass shell corresponds to the phantom defined by SCC34-SC2. The device holder positions are adjusted to the standard measurement positions in the three sections.

SAM Phantom

14.0 DEVICE HOLDER

The DASY3 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. 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.

Device Holder

15.0 TEST EQUIPMENT LIST

SAR MEASUREMENT SYSTEM		
EQUIPMENT	**SERIAL NO.**	**CALIBRATION DATE**
DASY3 System -Robot -ET3DV6 E-Field Probe -300MHz Validation Dipole -450MHz Validation Dipole -900MHz Validation Dipole -1800MHz Validation Dipole -2450MHz Validation Dipole -SAM Phantom V4.0C -Small Planar Phantom -Medium Planar Phantom -Large Planar Phantom	 599396-01 1387 135 136 054 247 150 N/A N/A N/A N/A	 N/A Feb 2002 Oct 2002 Oct 2002 June 2001 June 2001 Oct 2002 N/A N/A N/A N/A
85070C Dielectric Probe Kit	N/A	N/A
Gigatronics 8652A Power Meter -Power Sensor 80701A -Power Sensor 80701A	1835272 1833535 1833542	Feb 2002 Feb 2002 Mar 2002
E4408B Spectrum Analyzer	US39240170	Nov 2002
8594E Spectrum Analyzer	3543A02721	Feb 2002
8753E Network Analyzer	US38433013	Feb 2002
8648D Signal Generator	3847A00611	Feb 2002
5S1G4 Amplifier Research Power Amplifier	26235	N/A

16.0 MEASUREMENT UNCERTAINTIES

Error Description	Uncertainty Value ±%	Probability Distribution	Divisor	c_i 1g	Standard Uncertainty ±% (1g)	v_i or v_{eff}
Measurement System						
Probe calibration	± 4.8	Normal	1	1	± 4.8	∞
Axial isotropy of the probe	± 4.7	Rectangular	√3	$(1-c_p)$	± 1.9	∞
Spherical isotropy of the probe	± 9.6	Rectangular	√3	(c_p)	± 3.9	∞
Spatial resolution	± 0.0	Rectangular	√3	1	± 0.0	∞
Boundary effects	± 5.5	Rectangular	√3	1	± 3.2	∞
Probe linearity	± 4.7	Rectangular	√3	1	± 2.7	∞
Detection limit	± 1.0	Rectangular	√3	1	± 0.6	∞
Readout electronics	± 1.0	Normal	1	1	± 1.0	∞
Response time	± 0.8	Rectangular	√3	1	± 0.5	∞
Integration time	± 1.4	Rectangular	√3	1	± 0.8	∞
RF ambient conditions	± 3.0	Rectangular	√3	1	± 1.7	∞
Mech. constraints of robot	± 0.4	Rectangular	√3	1	± 0.2	∞
Probe positioning	± 2.9	Rectangular	√3	1	± 1.7	∞
Extrapolation & integration	± 3.9	Rectangular	√3	1	± 2.3	∞
Test Sample Related						
Device positioning	± 6.0	Normal	√3	1	± 6.7	12
Device holder uncertainty	± 5.0	Normal	√3	1	± 5.9	8
Power drift	± 5.0	Rectangular	√3		± 2.9	∞
Phantom and Setup						
Phantom uncertainty	± 4.0	Rectangular	√3	1	± 2.3	∞
Liquid conductivity (target)	± 5.0	Rectangular	√3	0.6	± 1.7	∞
Liquid conductivity (measured)	± 5.0	Rectangular	√3	0.6	± 1.7	∞
Liquid permittivity (target)	± 5.0	Rectangular	√3	0.6	± 1.7	∞
Liquid permittivity (measured)	± 5.0	Rectangular	√3	0.6	± 1.7	∞
Combined Standard Uncertainty					**± 13.7**	
Expanded Uncertainty (k=2) (95% Confidence Level)					**± 27.5**	

Measurement Uncertainty Table in accordance with IEEE Std 1528 (Draft - see reference [3])

17.0 REFERENCES

[1] Federal Communications Commission, “Radiofrequency radiation exposure evaluation: portable devices”, Rule Part 47 CFR §2.1093: 1999.

[2] Federal Communications Commission, “Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields”, OET Bulletin 65, Supplement C (Edition 01-01), FCC, Washington, D.C.: June 2001.

[3] IEEE Standards Coordinating Committee 34, Std 1528-200X, “DRAFT Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques”.

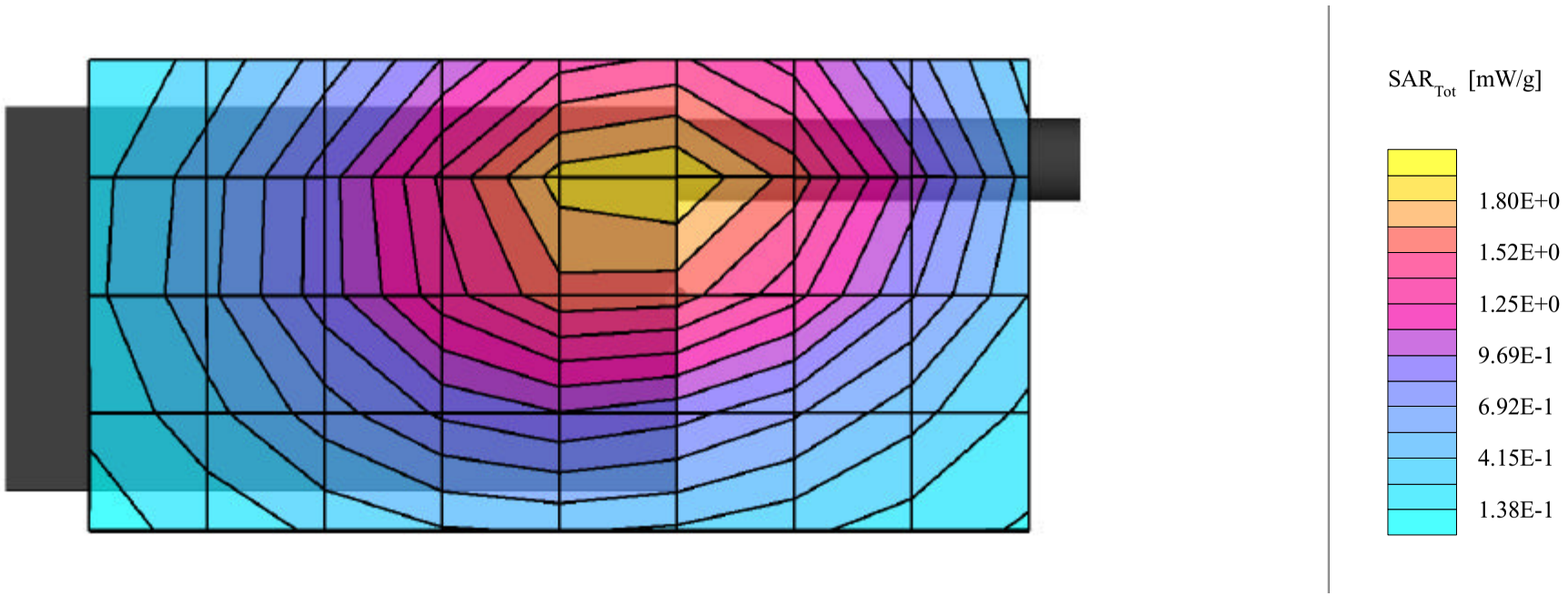
[4] W. Gander, *Computermathematick*, Birkhaeuser, Basel: 1992.

APPENDIX A - SAR MEASUREMENT DATA

Cobra Electronics Corporation FCC ID: BBOPR945

SAM Phantom; Flat Section; Position: (90°,90°)
Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0
450 MHz Brain: $\sigma = 0.86$ mho/m $\varepsilon_r = 44.3$ $\rho = 1.00$ g/cm^3
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Cube 5x5x7; Powerdrift: -0.11 dB
SAR (1g): 1.79 mW/g, SAR (10g): 1.27 mW/g

Face-held SAR - 2.5 cm Separation Distance
Portable UHF GMRS/FRS Radio Model: PR-945
AAA Alkaline Batteries (x4)
Continuous Wave Mode
GMRS Mid Channel [462.6250 MHz]
RF Output Power: 1.3 Watts ERP (GMRS)
Ambient Temp. 23.1°C; Fluid Temp. 22.3°C
Date Tested: December 20, 2002

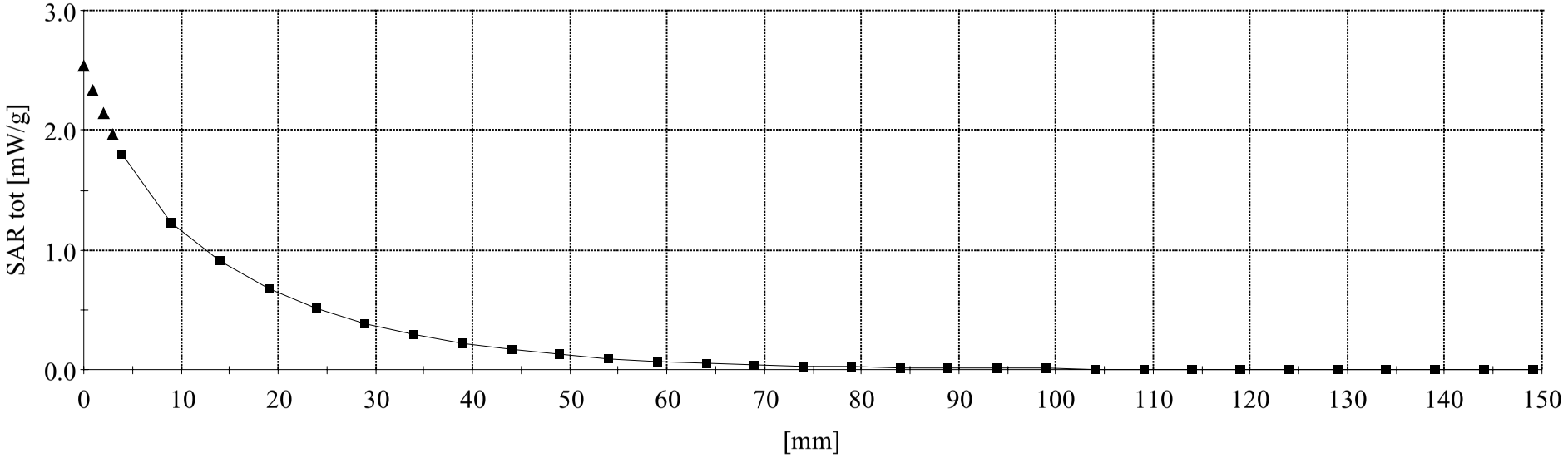


Cobra Electronics Corporation FCC ID: BBOPR945

SAM Phantom; Flat Section
Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0
450 MHz Brain: $\sigma = 0.86$ mho/m $\varepsilon_r = 44.3$ $\rho = 1.00$ g/cm^3

Z-Axis Extrapolation at Peak SAR Location

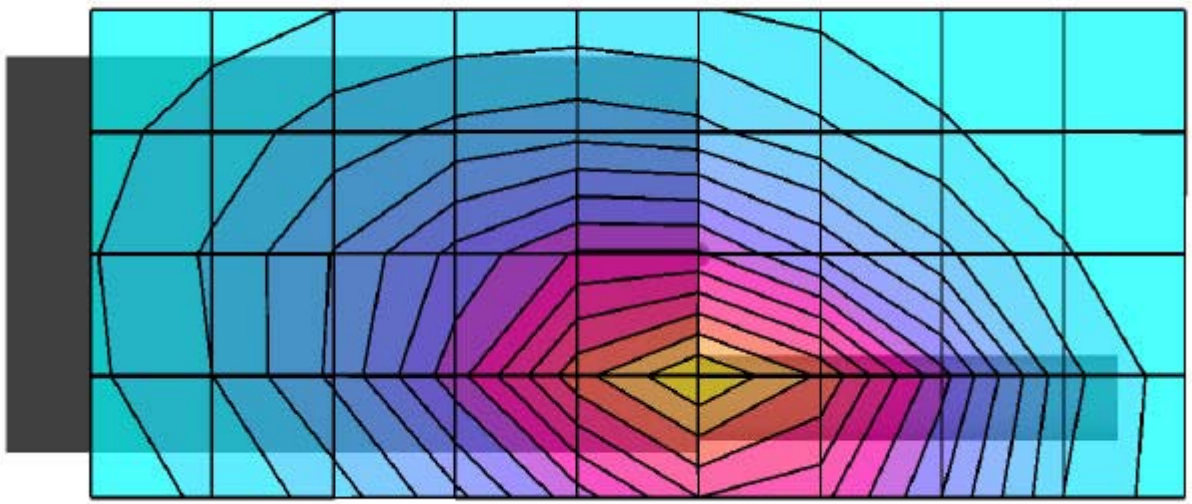
Face-held SAR - 2.5 cm Separation Distance
Portable UHF GMRS/FRS Radio Model: PR-945
AAA Alkaline Batteries (x4)
Continuous Wave Mode
GMRS Mid Channel [462.6250 MHz]
RF Output Power: 1.3 Watts ERP (GMRS)
Ambient Temp. 23.1°C; Fluid Temp. 22.3°C
Date Tested: December 20, 2002

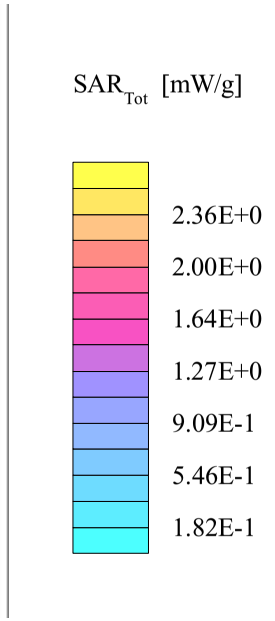


Cobra Electronics Corporation FCC ID: BBOPR945

SAM Phantom; Flat Section; Position: (270°,270°)
Probe: ET3DV6 - SN1387; ConvF(7.70,7.70,7.70); Crest factor: 1.0
450 MHz Muscle: $\sigma = 0.96$ mho/m $\varepsilon_r = 59.0$ $\rho = 1.00$ g/cm^3
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Cube 5x5x7; Powerdrift: -0.03 dB
SAR (1g): 2.17 mW/g, SAR (10g): 1.47 mW/g

Body-Worn SAR - 0.7 cm Belt-Clip Separation Distance
Portable UHF GMRS/FRS Radio Model: PR-945
with Lapel Ear-Microphone Accessory
AAA Alkaline Batteries (x4)
Continuous Wave Mode
GMRS Mid Channel [462.6250 MHz]
RF Output Power: 1.3 Watts ERP (GMRS)
Ambient Temp. 23.1°C; Fluid Temp. 22.3°C
Date Tested: December 20, 2002



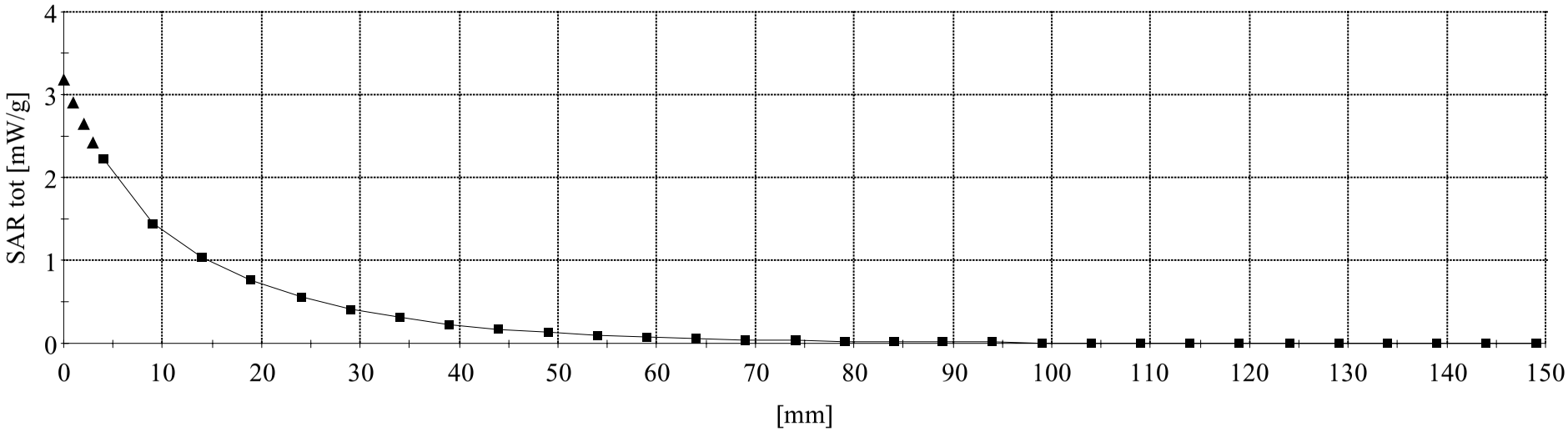


Cobra Electronics Corporation FCC ID: BBOPR945

SAM Phantom; Flat Section
Probe: ET3DV6 - SN1387; ConvF(7.70,7.70,7.70); Crest factor: 1.0
450 MHz Muscle: $\sigma = 0.96$ mho/m $\varepsilon_r = 59.0$ $\rho = 1.00$ g/cm^3

Z-Axis Extrapolation at Peak SAR Location

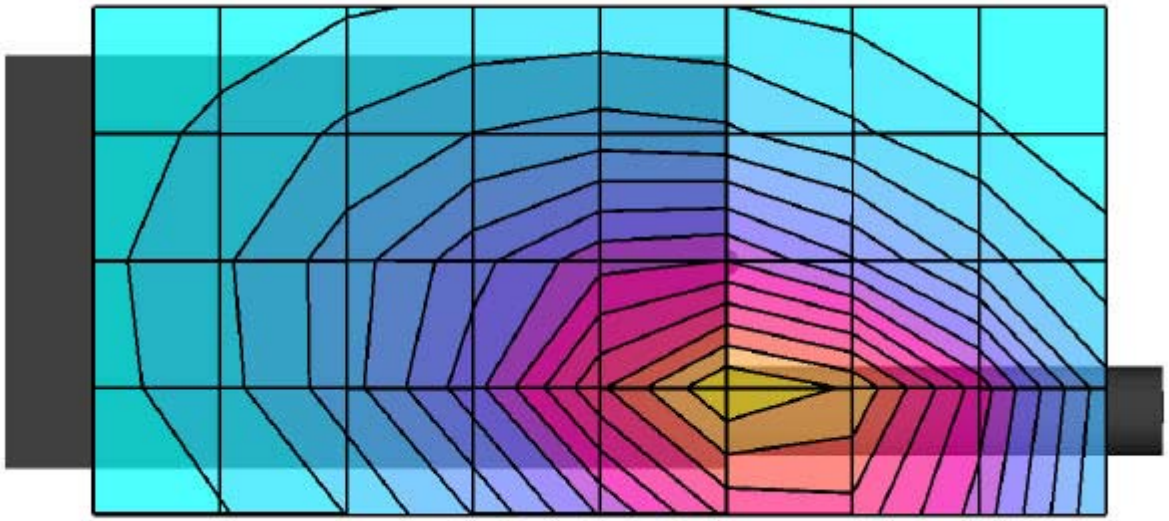
Body-Worn SAR - 0.7 cm Belt-Clip Separation Distance
Portable UHF GMRS/FRS Radio Model: PR-945
with Lapel Ear-Microphone Accessory
AAA Alkaline Batteries (x4)
Continuous Wave Mode
GMRS Mid Channel [462.6250 MHz]
RF Output Power: 1.3 Watts ERP (GMRS)
Ambient Temp. 23.1°C; Fluid Temp. 22.3°C
Date Tested: December 20, 2002



Cobra Electronics Corporation FCC ID: BBOPR945

SAM Phantom; Flat Section; Position: (270°,270°)
Probe: ET3DV6 - SN1387; ConvF(7.70,7.70,7.70); Crest factor: 1.0
450 MHz Muscle: $\sigma = 0.96$ mho/m $\varepsilon_r = 59.0$ $\rho = 1.00$ g/cm^3
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Cube 5x5x7; Powerdrift: -0.03 dB
SAR (1g): 1.82 mW/g, SAR (10g): 1.22 mW/g

Body-Worn SAR - 0.7 cm Belt-Clip Separation Distance
Portable UHF GMRS/FRS Radio Model: PR-945
with Boom-Microphone Headset Accessory
AAA Alkaline Batteries (x4)
Continuous Wave Mode
GMRS Mid Channel [462.6250 MHz]
RF Output Power: 1.3 Watts ERP (GMRS)
Ambient Temp. 23.1°C; Fluid Temp. 22.3°C
Date Tested: December 20, 2002



APPENDIX B - SYSTEM CHECK DATA

System Performance Check - 450MHz Dipole

Large Planar Phantom; Planar Section

Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0; 450 MHz Brain: $\sigma = 0.86$ mho/m $\varepsilon_r = 44.3$ $\rho = 1.00$ g/cm^3

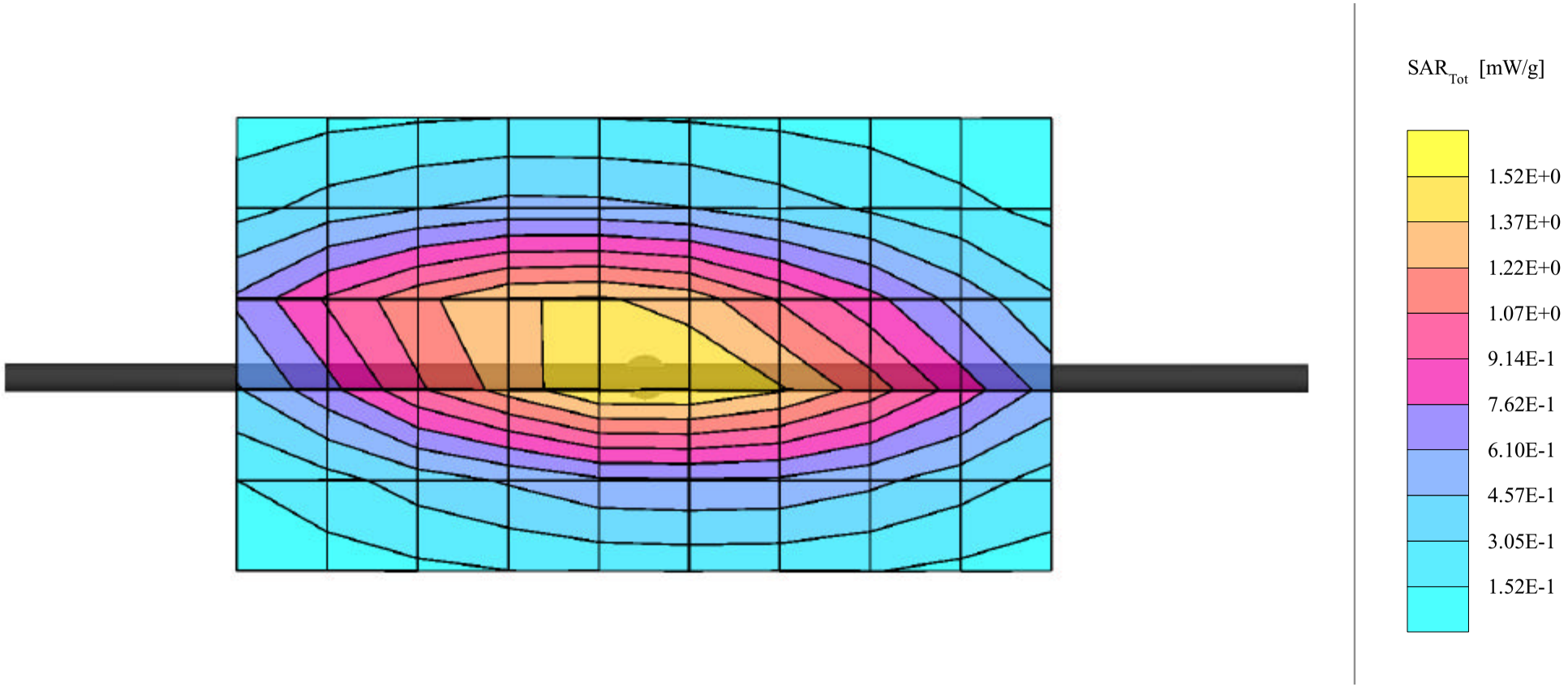
Cube 5x5x7: Peak: 2.05 mW/g, SAR (1g): 1.28 mW/g, SAR (10g): 0.836 mW/g, (Worst-case extrapolation)

Penetration depth: 12.0 (10.4, 14.1) [mm]; Powerdrift: -0.02 dB

Ambient Temp 23.1°C; Fluid Temp 22.3°C

Forward Conducted Power: 250 mW

Date Tested: December 20, 2002



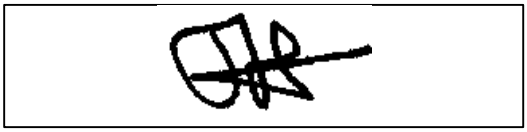
APPENDIX C - SYSTEM VALIDATION

450MHz SYSTEM VALIDATION DIPOLE

Type:	**450MHz Validation Dipole**
Serial Number:	**136**
Place of Calibration:	**Celltech Research Inc.**
Date of Calibration:	**October 17, 2002**

Celltech Research Inc. hereby certifies that this device has been calibrated on the date indicated above.

Calibrated by: 

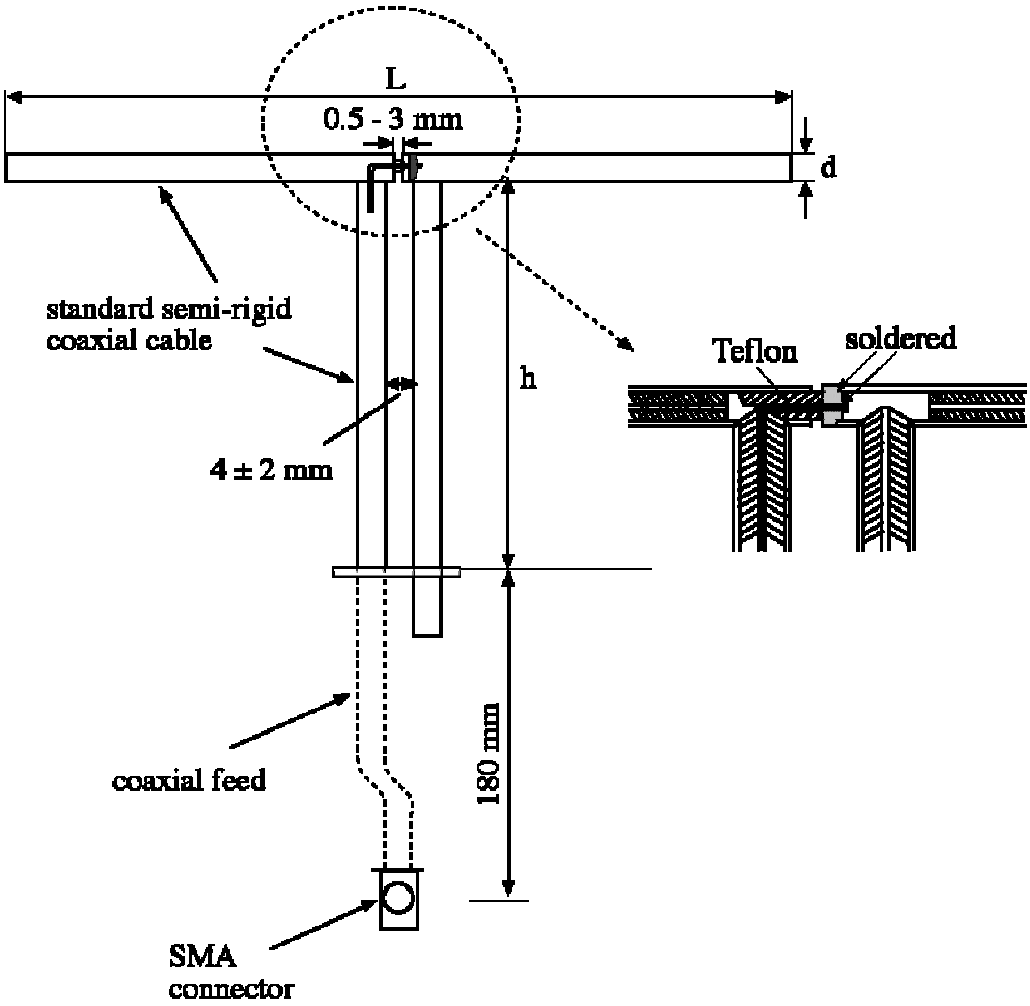
Approved by: 

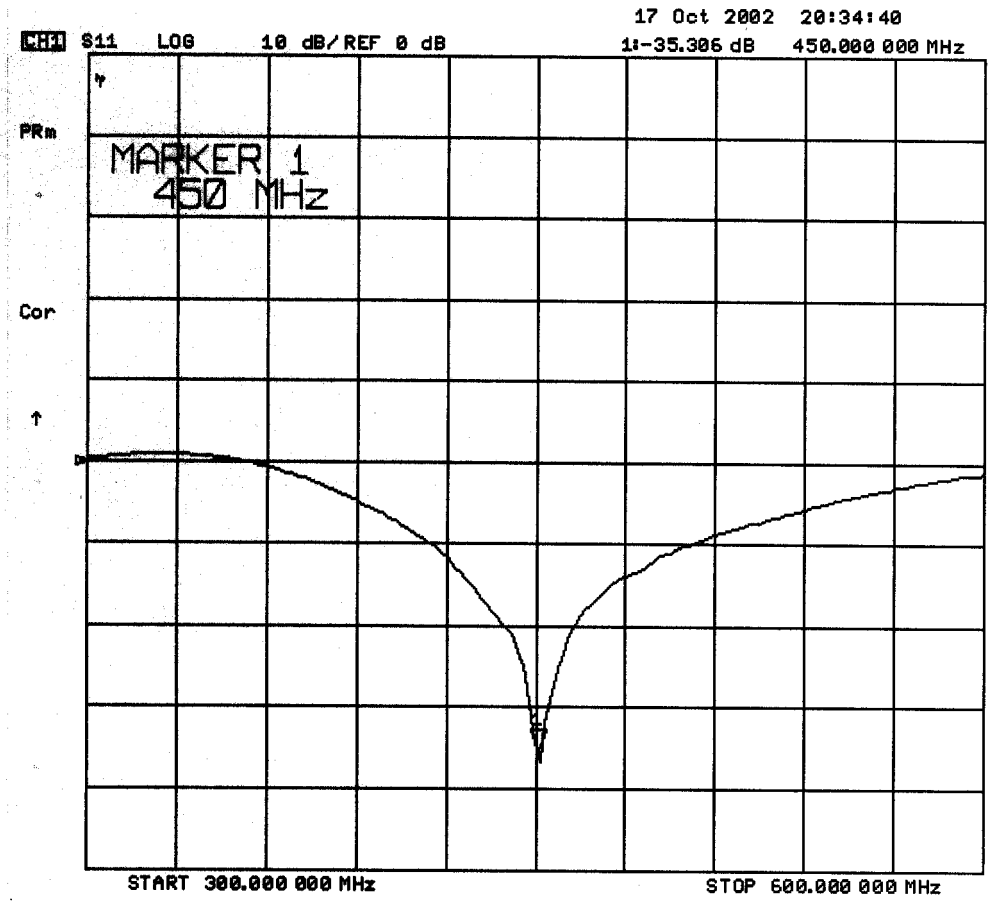
Celltech Research Inc. 1955 Moss Court, Kelowna, B.C. Canada V1Y 9L3
Tel. 250-448-7047 • Fax. 250-448-7046 • e-mail: info@celltechlabs.com
www.celltechlabs.com

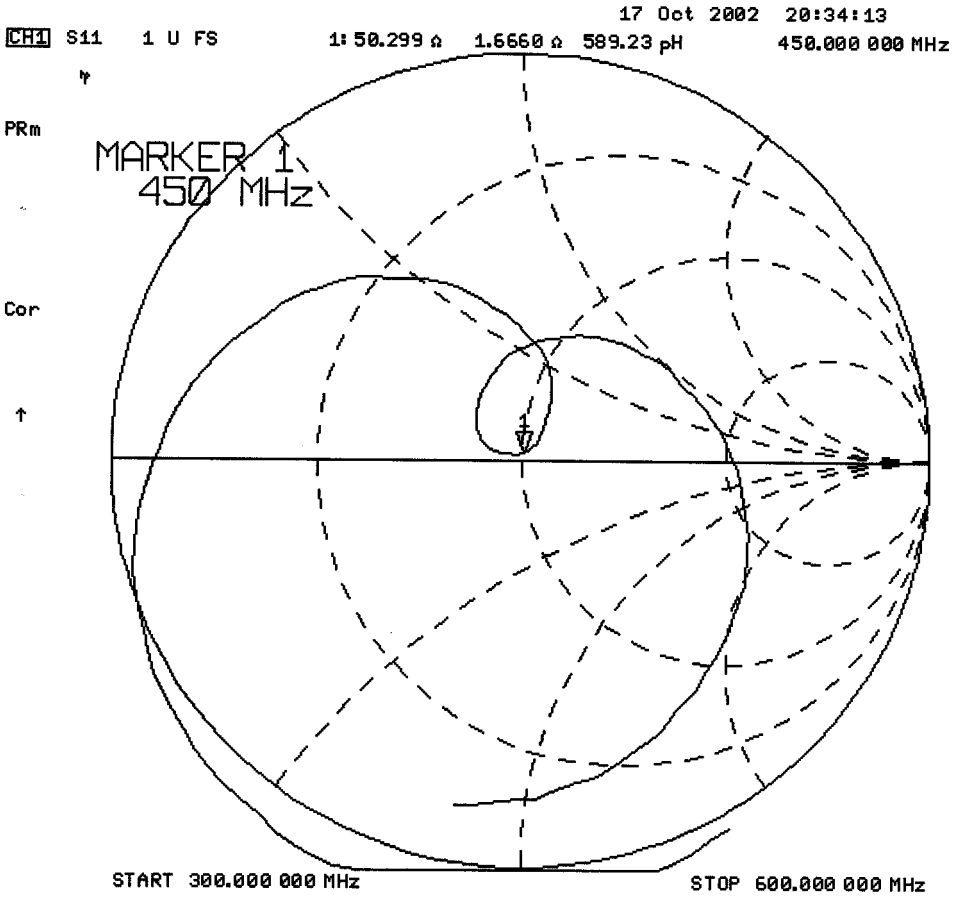
1. Dipole Construction & Electrical Characteristics

The validation dipole was constructed in accordance with the IEEE Std "Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques". The electrical properties were measured using an HP 8753E Network Analyzer. The network analyzer was calibrated to the validation dipole N-type connector feed point using an HP85032E Type N calibration kit. The dipole was placed parallel to a planar phantom at a separation distance of 15.0mm from the simulating fluid using a loss-less dielectric spacer. The measured input impedance is:

Feed point impedance at 450MHz	Re{Z} = 50.299Ω
	Im{Z} = 1.6660Ω
Return Loss at 450MHz	-35.306dB




17 Oct 2002 20:34:40
CH1 S11 LOG 10 dB/ REF 0 dB
1:-35.306 dB 450.000 000 MHz
PRm
MARKER 1
450 MHz
Cor
START 300.000 000 MHz
STOP 600.000 000 MHz


17 Oct 2002 20:34:13
CH1 S11 1 U FS
1: 50.299 Ω 1.6660 Ω 589.23 pH
450.000 000 MHz
PRm
MARKER 1
450 MHz
Cor
START 300.000 000 MHz
STOP 600.000 000 MHz

Validation Dipole Dimensions

Frequency (MHz)	L (mm)	h (mm)	d (mm)
300	420.0	250.0	6.2
450	288.0	167.0	6.2
835	161.0	89.8	3.6
900	149.0	83.3	3.6
1450	89.1	51.7	3.6
1800	72.0	41.7	3.6
1900	68.0	39.5	3.6
2000	64.5	37.5	3.6
2450	51.8	30.6	3.6
3000	41.5	25.0	3.6

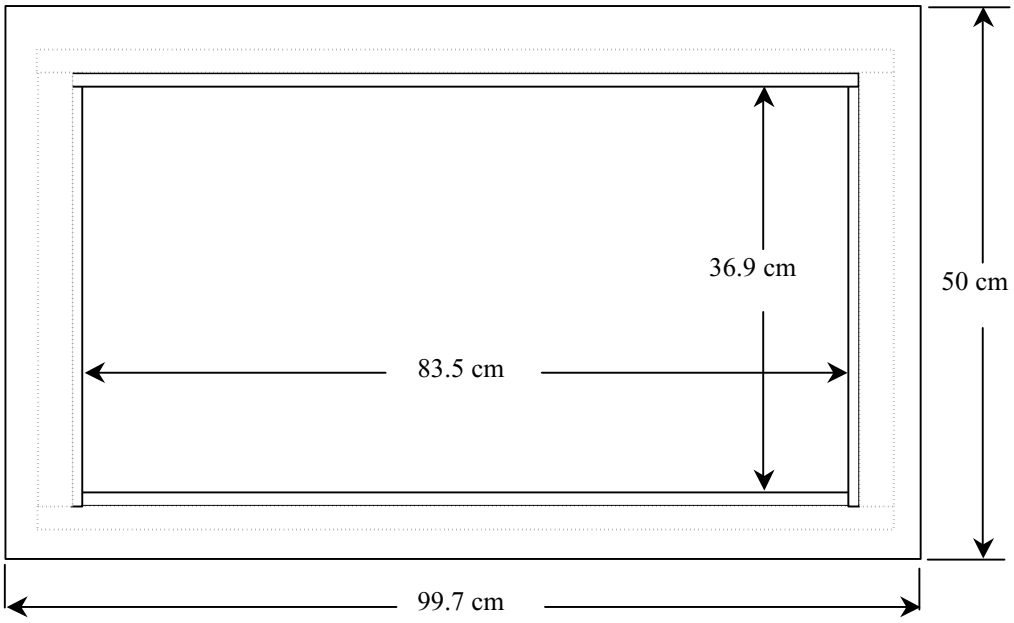
2. Validation Phantom

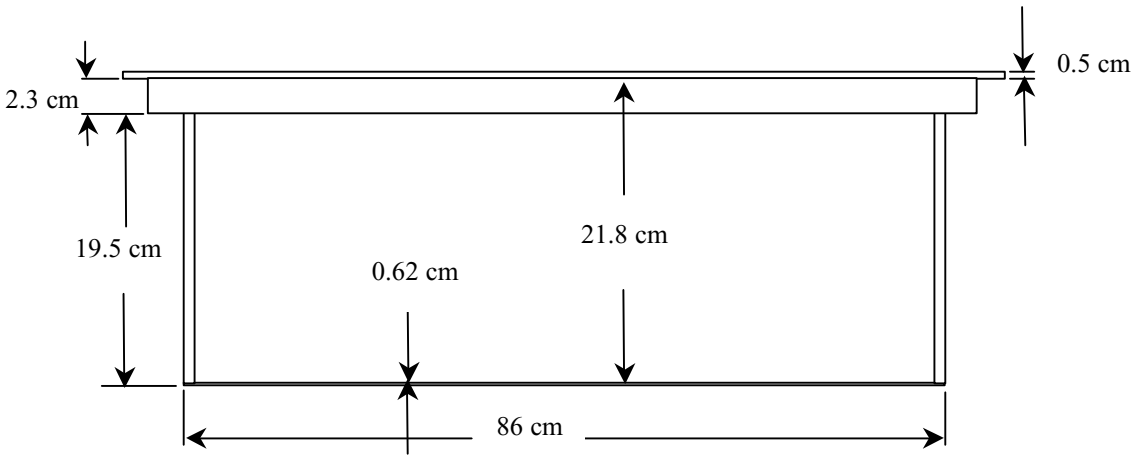
The validation phantom was constructed using relatively low-loss tangent Plexiglas material. The dimensions of the phantom are as follows:

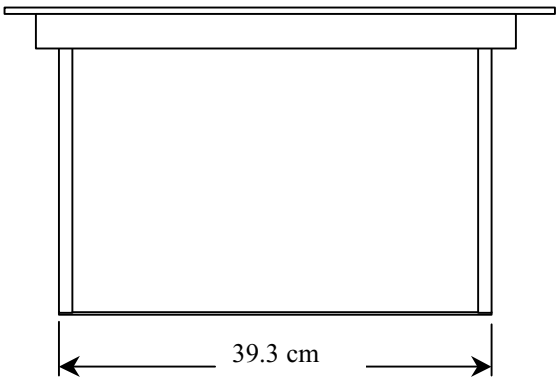
Length: 83.5 cm
Width: 36.9 cm
Height: 21.8 cm

The bottom of the phantom is constructed of 6.2 ± 0.1mm Plexiglas.

Dimensions of Plexiglas Planar Phantom







450MHz System Validation Setup

450MHz System Validation Setup

3. Measurement Conditions

The planar phantom was filled with brain simulating tissue having the following electrical parameters at 450MHz:

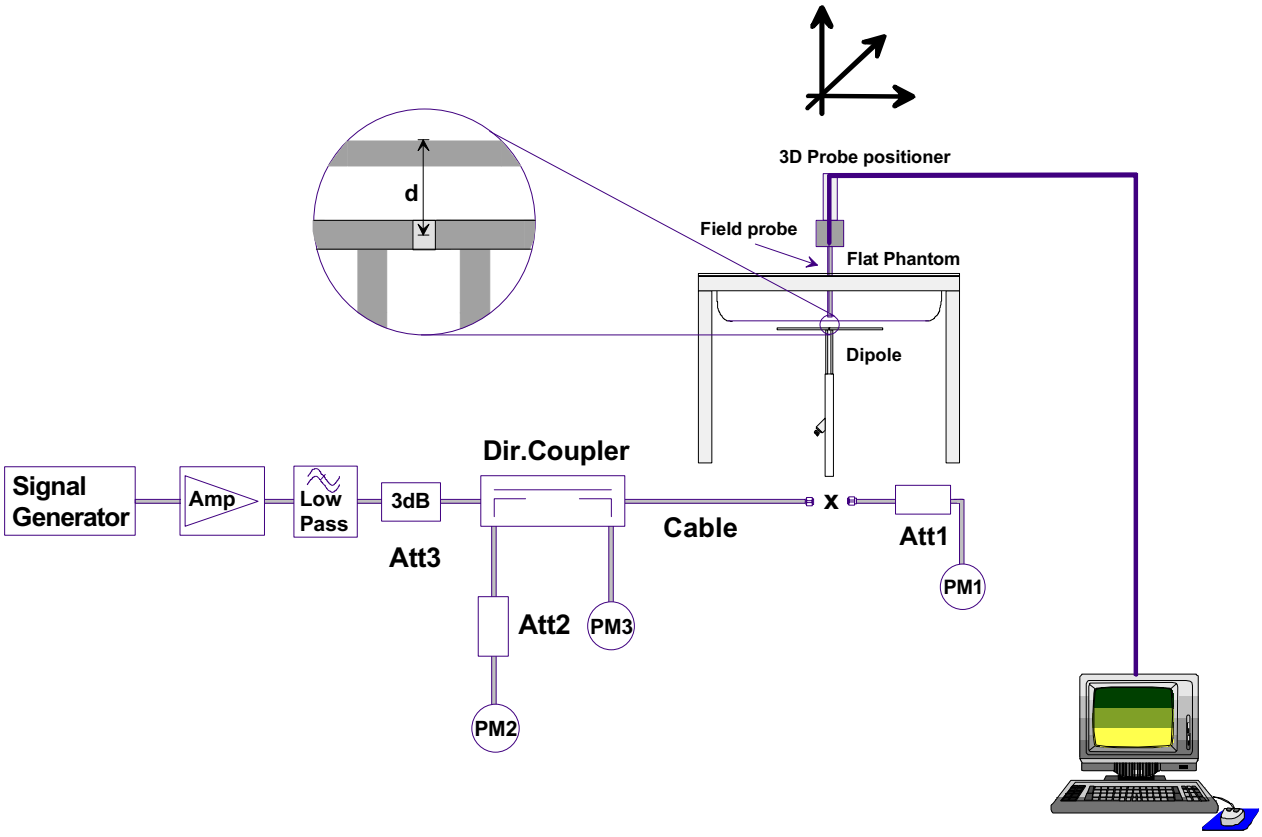
Relative Permittivity:	44.1
Conductivity:	0.88 mho/m
Ambient Temperature:	23.3 °C
Fluid Temperature:	22.2 °C
Fluid Depth:	≥ 15.0 cm

The 450MHz simulating tissue consists of the following ingredients:

Ingredient	Percentage by weight
Water	38.56%
Sugar	56.32%
Salt	3.95%
HEC	0.98%
Dowicil 75	0.19%
Target Dielectric Parameters at 22°C	ε_r = 43.5 σ = 0.87 S/m

4. SAR Measurement

The SAR measurement was performed with the E-field probe in mechanical detection mode only. The setup and determination of the forward power into the dipole was performed using the following procedures.



First the power meter PM1 (including attenuator Att1) is connected to the cable to measure the forward power at the location of the dipole connector (X). The signal generator is adjusted for the desired forward power at the dipole connector (taking into account the attenuation of Att1) as read by power meter PM2. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter PM2. If the signal generator does not allow adjustment in 0.01dB steps, the remaining difference at PM2 must be taken into consideration. PM3 records the reflected power from the dipole to ensure that the value is not changed from the previous value. The reflected power should be 20dB below the forward power.

Ten SAR measurements were performed in order to achieve repeatability and to establish an average target value.

Validation Dipole SAR Test Results

Validation Measurement	SAR @ 0.25W Input averaged over 1g	SAR @ 1W Input averaged over 1g	SAR @ 0.25W Input averaged over 10g	SAR @ 1W Input averaged over 10g	Peak SAR @ 0.25W Input
Test 1	1.32	5.28	0.887	3.55	2.20
Test 2	1.26	5.04	0.856	3.42	2.09
Test 3	1.38	5.52	0.931	3.72	2.30
Test 4	1.36	5.44	0.917	3.67	2.27
Test 5	1.37	5.48	0.922	3.69	2.28
Test 6	1.33	5.32	0.896	3.58	2.22
Test 7	1.34	5.36	0.902	3.61	2.24
Test 8	1.33	5.32	0.895	3.58	2.21
Test 9	1.39	5.56	0.931	3.72	2.31
Test10	1.36	5.44	0.917	3.67	2.27
Average Value	1.34	5.38	0.905	3.62	2.24

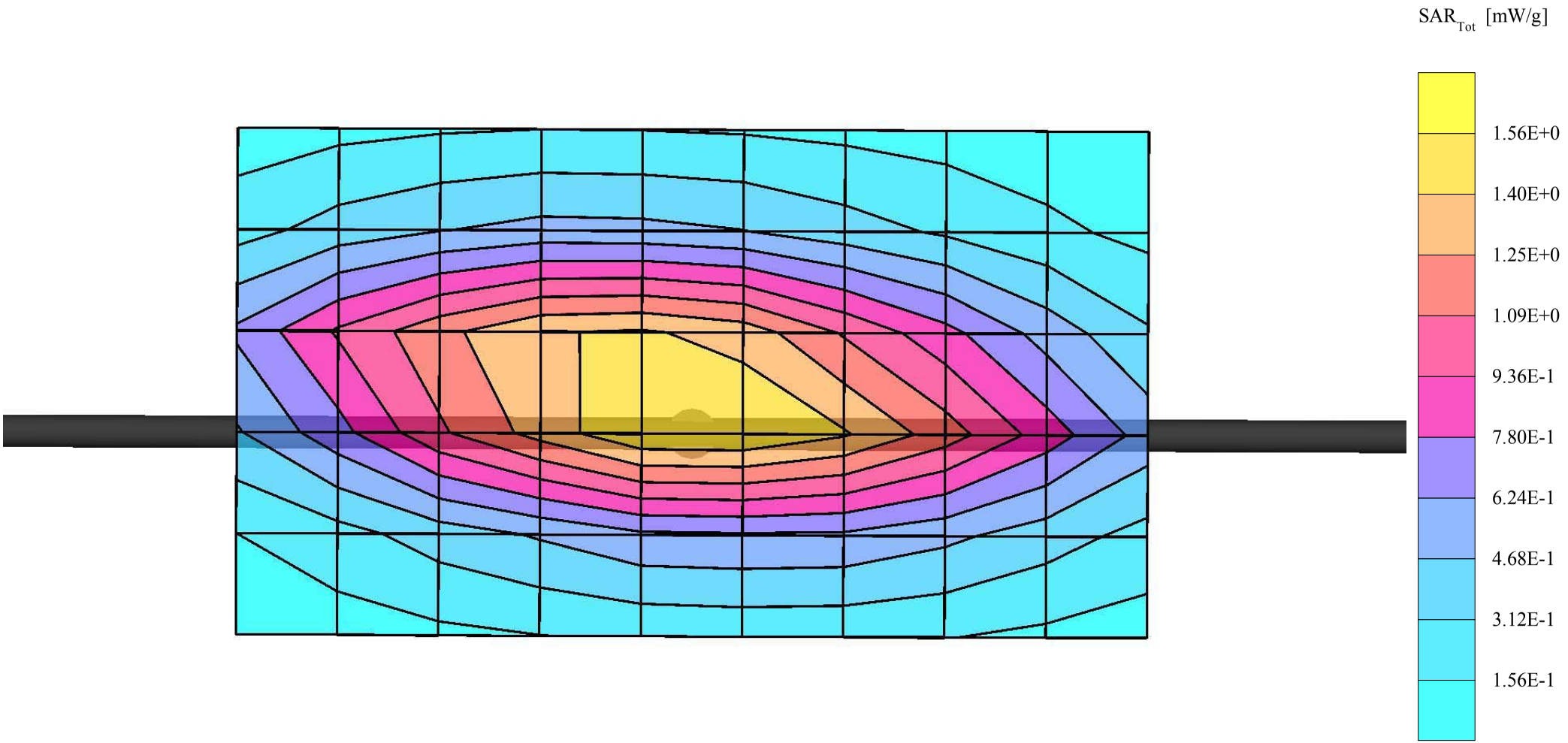
The results have been normalized to 1W (forward power) into the dipole.

Averaged over 1cm (1g) of tissue: 5.38 mW/g

Averaged over 10cm (10g) of tissue: 3.62 mW/g

Dipole 450MHz, d = 15 mm

Frequency: 450 MHz; Antenna Input Power: 250 [mW]
Large Planar Phantom; Planar Section
Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0; 450 MHz Brain: σ = 0.88 mho/m ε_r = 44.1 ρ = 1.00 g/cm^3
Cube 5x5x7: Peak: 2.24 mW/g, SAR (1g): 1.34 mW/g, SAR (10g): 0.905 mW/g, (Worst-case extrapolation)
Penetration depth: 12.0 (10.5, 14.0) [mm]; Powerdrift: 0.01 dB; Ambient Temp.: 23.3°C; Fluid Temp.: 22.2°C
Calibration Date: October 17, 2002



450MHz System Validation

Measured Fluid Dielectric Parameters (Brain)

October 17, 2002

Frequency	e'	e''
350.000000 MHz	46.6334	40.6323
360.000000 MHz	46.3629	40.0034
370.000000 MHz	46.1498	39.3672
380.000000 MHz	45.8833	38.6723
390.000000 MHz	45.5947	38.0484
400.000000 MHz	45.3226	37.4538
410.000000 MHz	45.0977	36.9636
420.000000 MHz	44.8241	36.4841
430.000000 MHz	44.5839	35.9541
440.000000 MHz	44.3183	35.5098
450.000000 MHz	44.0572	35.0854
460.000000 MHz	43.8600	34.7069
470.000000 MHz	43.6544	34.3371
480.000000 MHz	43.4507	33.9296
490.000000 MHz	43.2880	33.5147
500.000000 MHz	43.0921	33.1731
510.000000 MHz	42.8781	32.7813
520.000000 MHz	42.6765	32.4193
530.000000 MHz	42.5864	32.1000
540.000000 MHz	42.4644	31.7180
550.000000 MHz	42.3042	31.4503

APPENDIX D - PROBE CALIBRATION

Schmid & Partner
Engineering AG

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

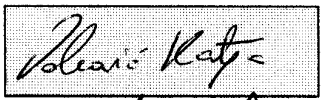
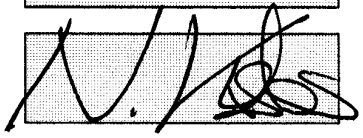
Calibration Certificate

Dosimetric E-Field Probe

Type:	**ET3DV6**
Serial Number:	**1387**
Place of Calibration:	**Zurich**
Date of Calibration:	**February 22, 2002**
Calibration Interval:	**12 months**

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

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

Calibrated by:	
Approved by:	

Probe ET3DV6

SN:1387

Manufactured:	September 21, 1999
Last calibration:	September 22, 1999
Recalibrated:	February 22, 2002

Calibrated for System DASY3

DASY3 - Parameters of Probe: ET3DV6 SN:1387

Sensitivity in Free Space

Diode Compression

NormX	**1.58**	$\mu V/(V/m)^2$	DCP X	**97**	mV
NormY	**1.67**	$\mu V/(V/m)^2$	DCP Y	**97**	mV
NormZ	**1.67**	$\mu V/(V/m)^2$	DCP Z	**97**	mV

Sensitivity in Tissue Simulating Liquid

Head **900 MHz** **ε_r = 41.5 ± 5%** **σ = 0.97 ± 5% mho/m**
Head **835 MHz** **ε_r = 41.5 ± 5%** **σ = 0.90 ± 5% mho/m**

ConvF X	**6.6**	± 9.5% (k=2)	Boundary effect:	
ConvF Y	**6.6**	± 9.5% (k=2)	Alpha	**0.40**
ConvF Z	**6.6**	± 9.5% (k=2)	Depth	**2.38**

Head **1800 MHz** **ε_r = 40.0 ± 5%** **σ = 1.40 ± 5% mho/m**
Head **1900 MHz** **ε_r = 40.0 ± 5%** **σ = 1.40 ± 5% mho/m**

ConvF X	**5.4**	± 9.5% (k=2)	Boundary effect:	
ConvF Y	**5.4**	± 9.5% (k=2)	Alpha	**0.57**
ConvF Z	**5.4**	± 9.5% (k=2)	Depth	**2.18**

Boundary Effect

Head **900 MHz** **Typical SAR gradient: 5 % per mm**

Probe Tip to Boundary		**1 mm**	**2 mm**
SAR_{be} [%]	Without Correction Algorithm	9.7	5.4
SAR_{be} [%]	With Correction Algorithm	0.3	0.6

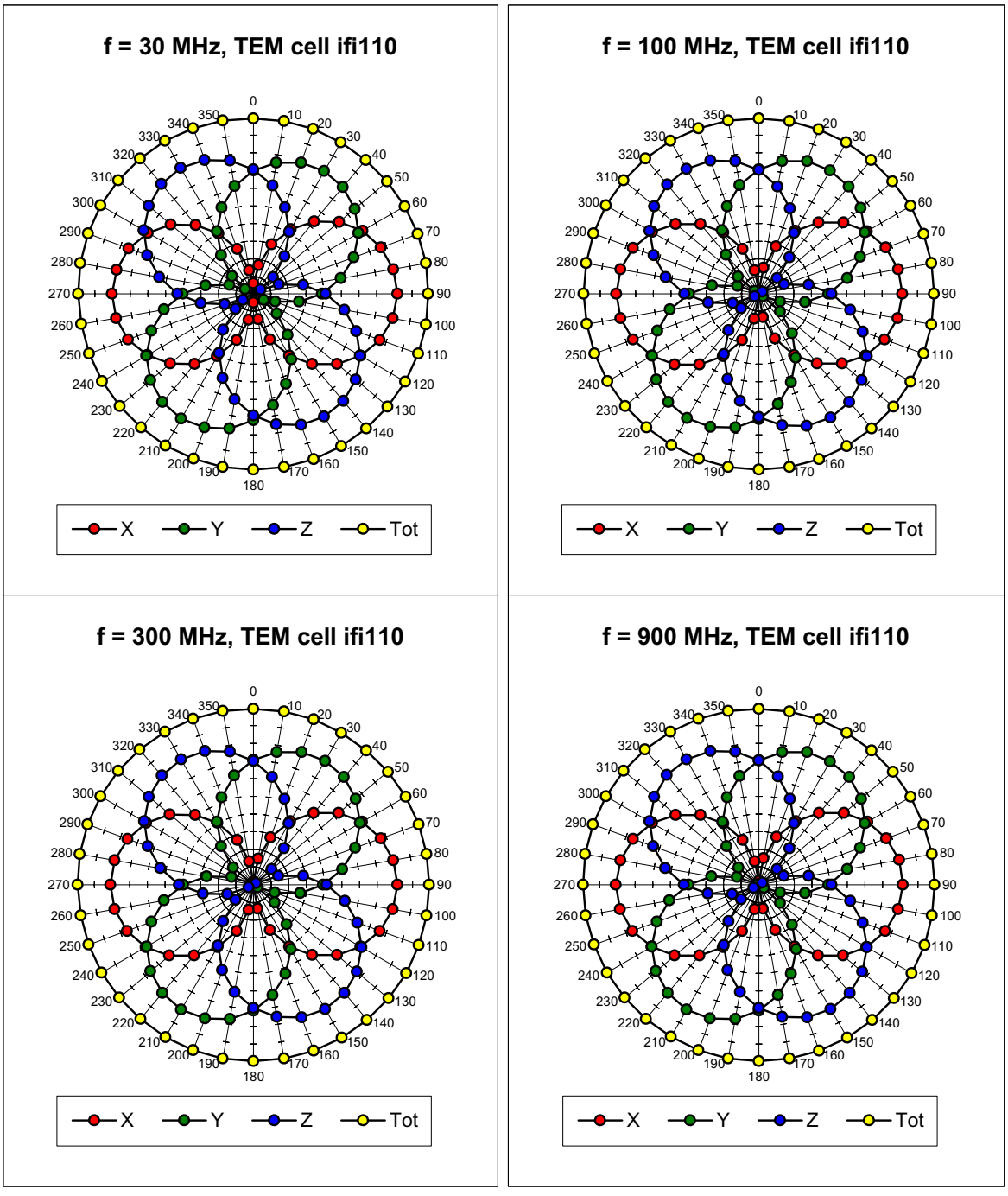
Head **1800 MHz** **Typical SAR gradient: 10 % per mm**

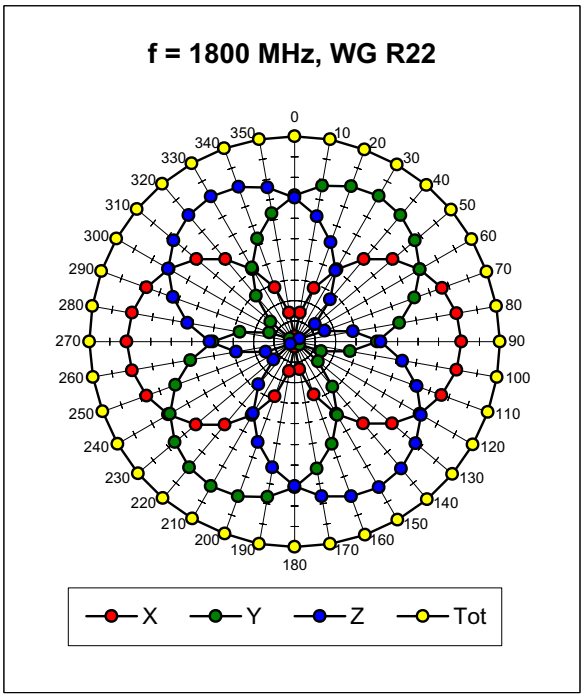
Probe Tip to Boundary		**1 mm**	**2 mm**
SAR_{be} [%]	Without Correction Algorithm	11.5	7.3
SAR_{be} [%]	With Correction Algorithm	0.1	0.3

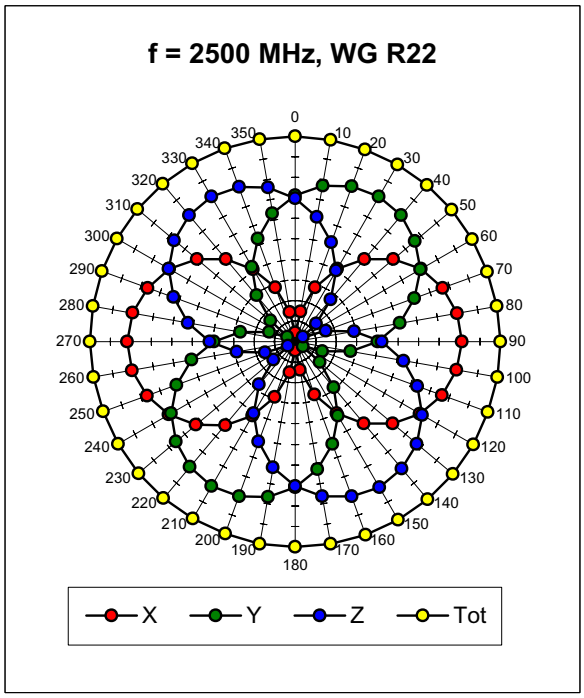
Sensor Offset

Probe Tip to Sensor Center	**2.7**	mm
Optical Surface Detection	**1.3 ± 0.2**	mm

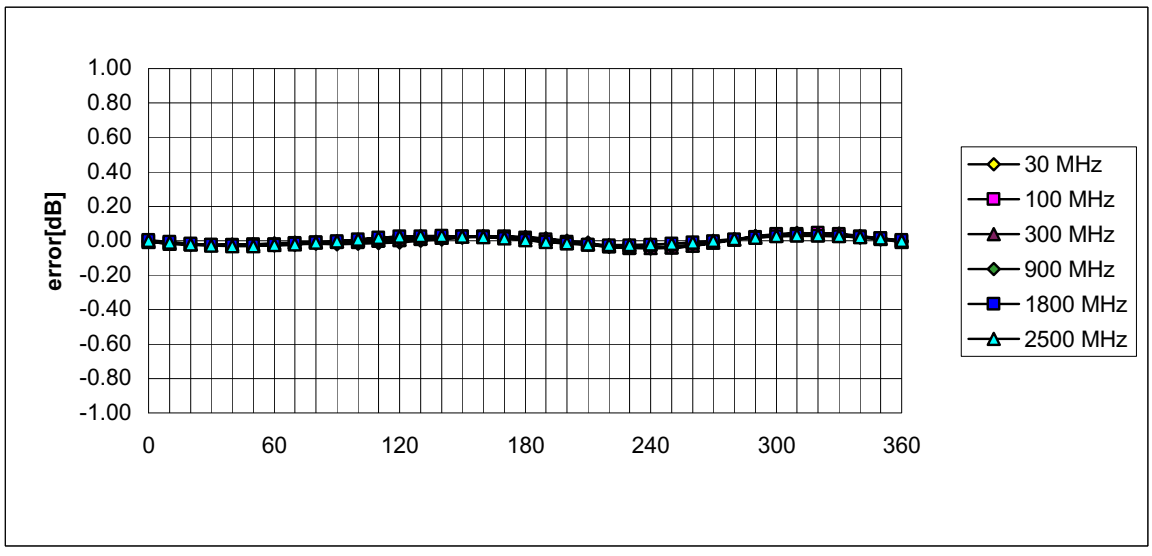
Receiving Pattern (ϕ , θ = 0°





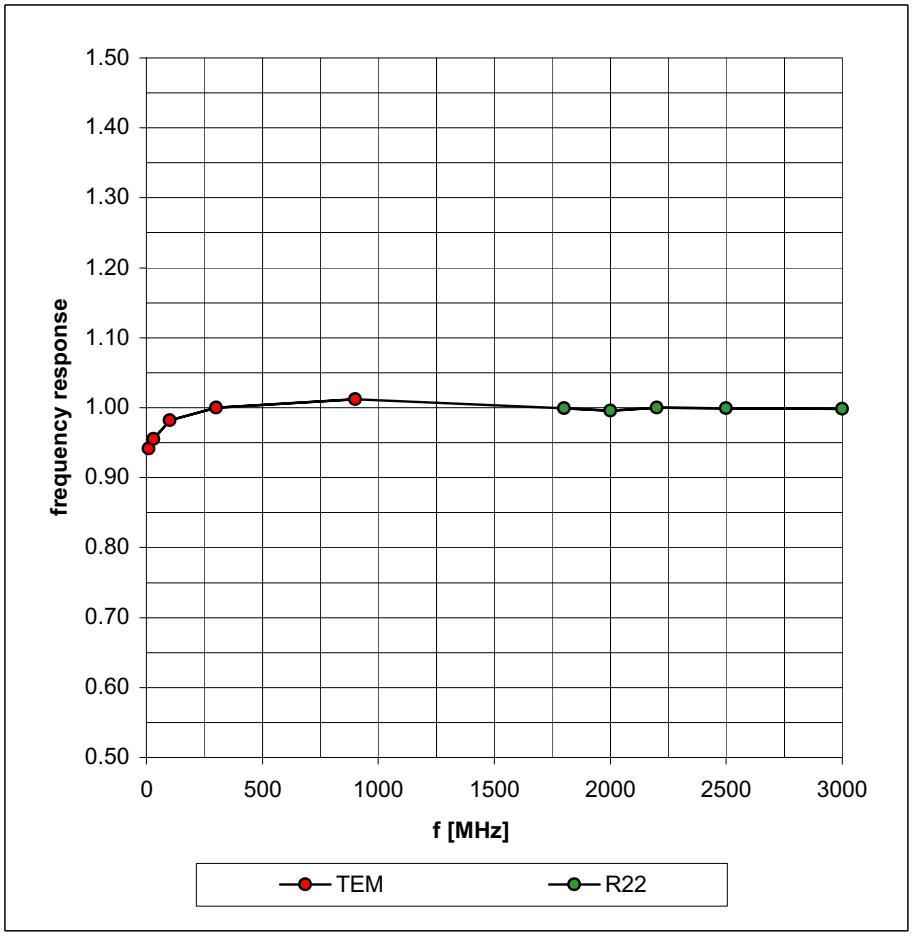


Isotropy Error (ϕ), θ = 0°



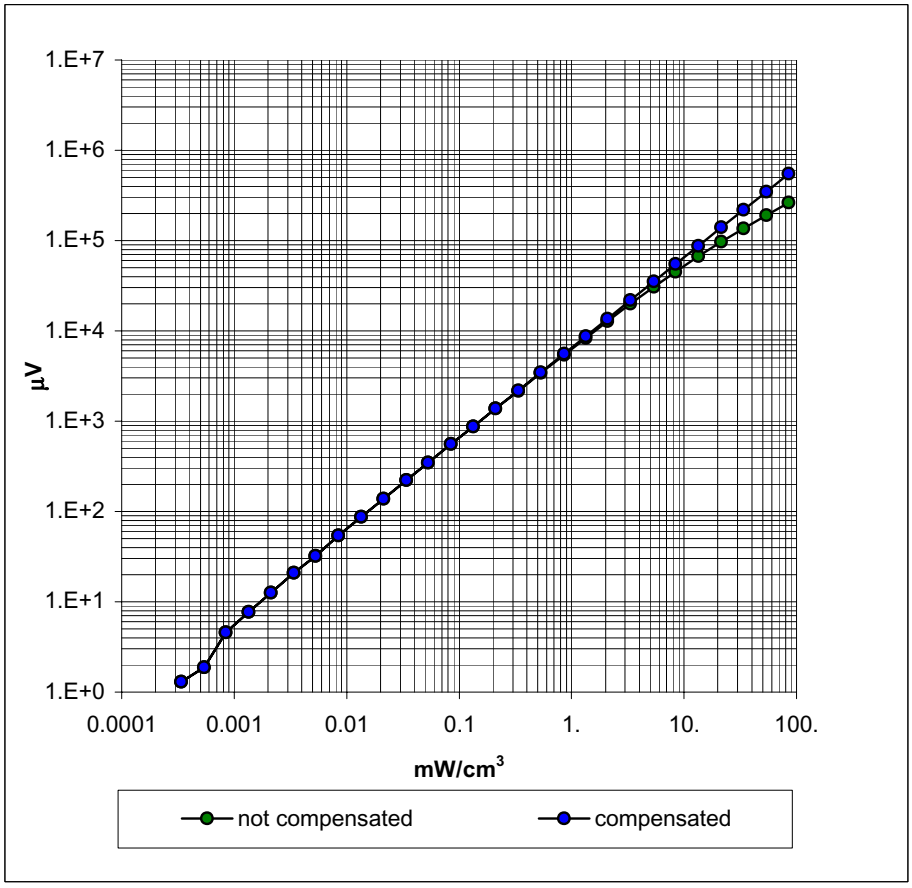
Frequency Response of E-Field

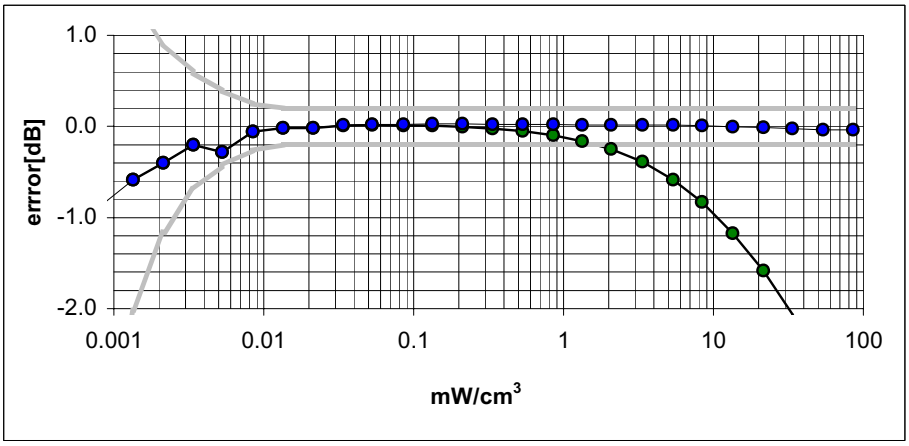
(TEM-Cell:ifi110, Waveguide R22)



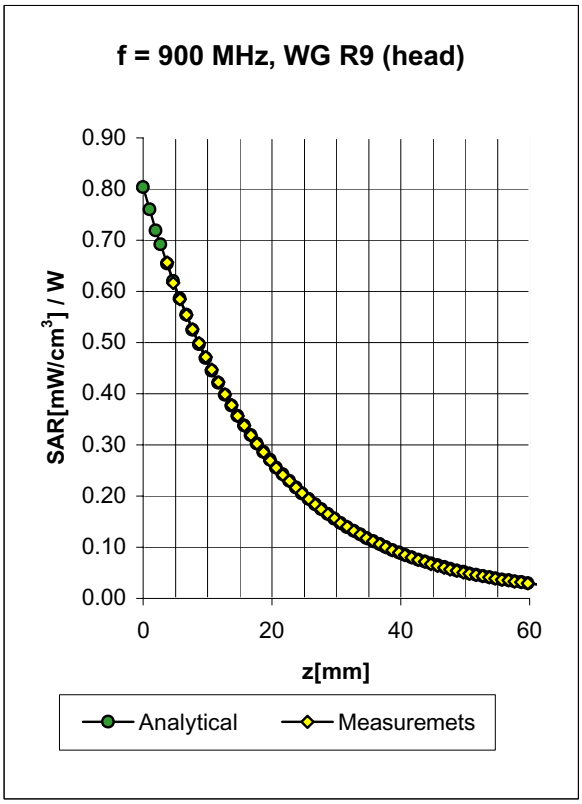
Dynamic Range f(SAR_{brain})

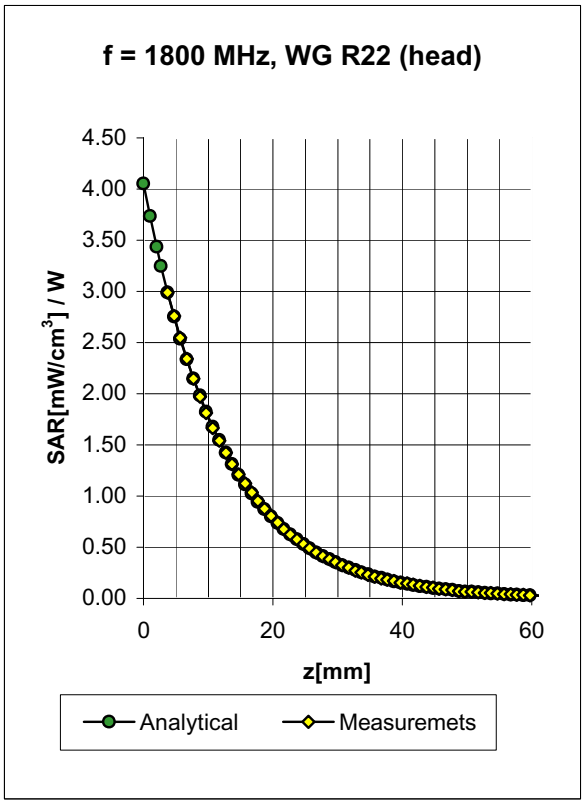
(Waveguide R22)





Conversion Factor Assessment



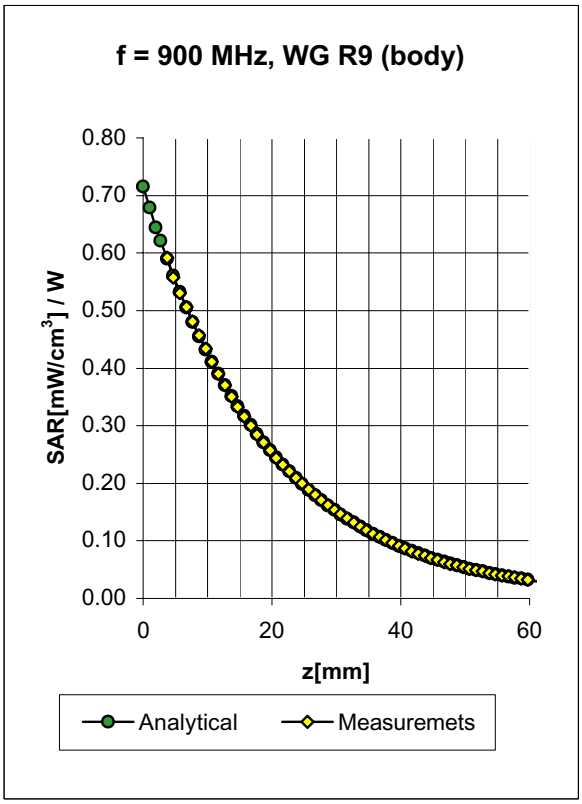


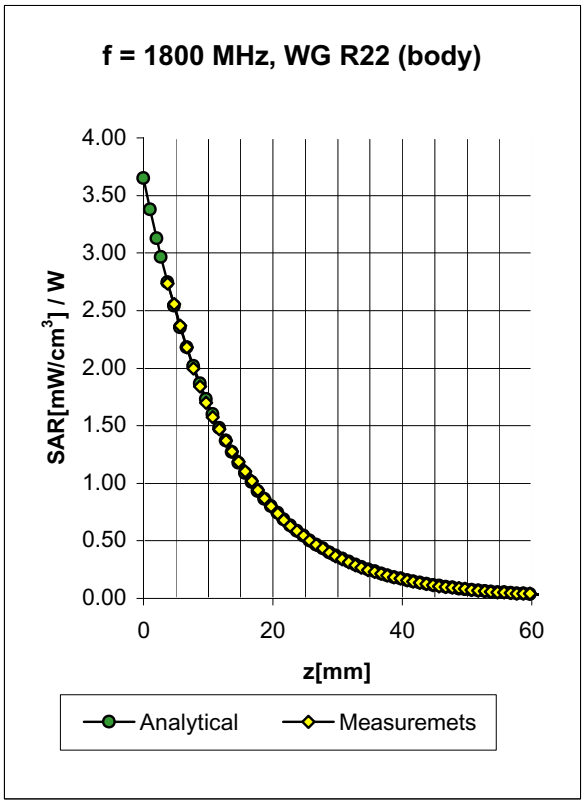
Head	**900 MHz**		**ε_r = 41.5 ± 5%**	**σ = 0.97 ± 5% mho/m**
Head	**835 MHz**		**ε_r = 41.5 ± 5%**	**σ = 0.90 ± 5% mho/m**
	ConvF X	**6.6** ± 9.5% (k=2)		Boundary effect:
	ConvF Y	**6.6** ± 9.5% (k=2)		Alpha **0.40**
	ConvF Z	**6.6** ± 9.5% (k=2)		Depth **2.38**

Head	**1800 MHz**		**ε_r = 40.0 ± 5%**	**σ = 1.40 ± 5% mho/m**
Head	**1900 MHz**		**ε_r = 40.0 ± 5%**	**σ = 1.40 ± 5% mho/m**
	ConvF X	**5.4** ± 9.5% (k=2)		Boundary effect:
	ConvF Y	**5.4** ± 9.5% (k=2)		Alpha **0.57**
	ConvF Z	**5.4** ± 9.5% (k=2)		Depth **2.18**

ET3DV6 SN:1387 **February 22, 2002**

Conversion Factor Assessment





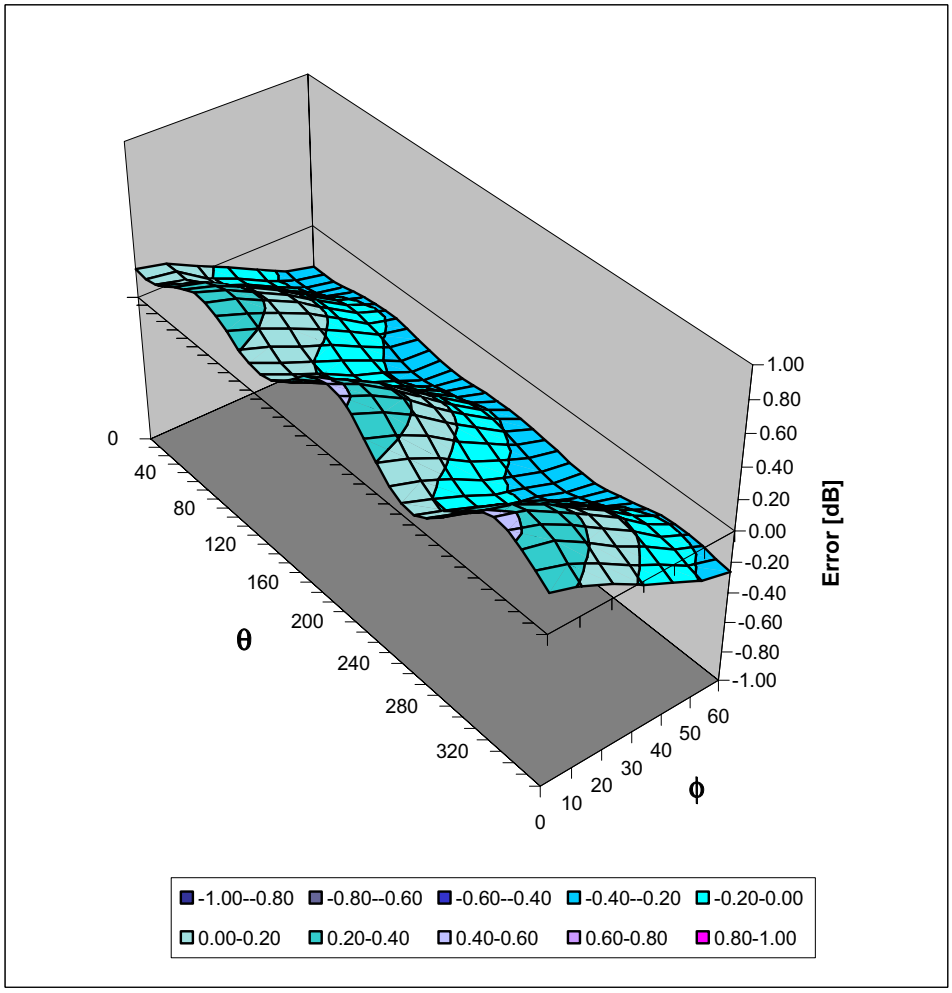
Body	**900 MHz**	ε_r **= 55.0 ± 5%**	**σ = 1.05 ± 5% mho/m**	
Body	**835 MHz**	ε_r **= 55.2 ± 5%**	**σ = 0.97 ± 5% mho/m**	
	ConvF X	**6.3** ± 9.5% (k=2)	Boundary effect:	
	ConvF Y	**6.3** ± 9.5% (k=2)	Alpha	**0.42**
	ConvF Z	**6.3** ± 9.5% (k=2)	Depth	**2.44**

Body	**1800 MHz**	ε_r **= 53.3 ± 5%**	**σ = 1.52 ± 5% mho/m**	
Body	**1900 MHz**	ε_r **= 53.3 ± 5%**	**σ = 1.52 ± 5% mho/m**	
	ConvF X	**5.0** ± 9.5% (k=2)	Boundary effect:	
	ConvF Y	**5.0** ± 9.5% (k=2)	Alpha	**0.76**
	ConvF Z	**5.0** ± 9.5% (k=2)	Depth	**2.01**

ET3DV6 SN:1387 **February 22, 2002**

Deviation from Isotropy in HSL

Error ($\theta\phi$), f = 900 MHz



Schmid & Partner
Engineering AG

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

Type:	**ET3DV6**
Serial Number:	**1387**
Place of Assessment:	**Zurich**
Date of Assessment:	**February 25, 2002**
Probe Calibration Date:	**February 22, 2002**

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

Assessed by:

Dosimetric E-Field Probe ET3DV6 SN:1387

Conversion Factor (± standard deviation)

150 MHz	ConvF	**9.2 ± 8%**	**ε_r = 52.3** **σ = 0.76 mho/m** (head tissue)
300 MHz	ConvF	**8.0 ± 8%**	**ε_r = 45.3** **σ = 0.87 mho/m** (head tissue)
450 MHz	ConvF	**7.3 ± 8%**	**ε_r = 43.5** **σ = 0.87 mho/m** (head tissue)
2450 MHz	ConvF	**4.7 ± 8%**	**ε_r = 39.2** **σ = 1.80 mho/m** (head tissue)
150 MHz	ConvF	**8.8 ± 8%**	**ε_r = 61.9** **σ = 0.80 mho/m** (body tissue)
450 MHz	ConvF	**7.7 ± 8%**	**ε_r = 56.7** **σ = 0.94 mho/m** (body tissue)
2450 MHz	ConvF	**4.3 ± 8%**	**ε_r = 52.7** **σ = 1.95 mho/m** (body tissue)

APPENDIX E - MEASURED FLUID DIELECTRIC PARAMETERS

450MHz System Performance Check & DUT Evaluation (Face)

Measured Fluid Dielectric Parameters (Brain)

December 20, 2002

Frequency	e'	e''
350.000000 MHz	46.9078	39.8254
360.000000 MHz	46.6884	39.1511
370.000000 MHz	46.4002	38.4771
380.000000 MHz	46.1076	37.9161
390.000000 MHz	45.8356	37.3281
400.000000 MHz	45.5678	36.8319
410.000000 MHz	45.3067	36.2982
420.000000 MHz	45.0463	35.8302
430.000000 MHz	44.7723	35.3279
440.000000 MHz	44.5660	34.9439
450.000000 MHz	44.3123	34.5004
460.000000 MHz	44.1472	34.1452
470.000000 MHz	43.9199	33.7521
480.000000 MHz	43.7411	33.3324
490.000000 MHz	43.5177	32.9199
500.000000 MHz	43.2967	32.5751
510.000000 MHz	43.1022	32.2397
520.000000 MHz	42.9675	31.9235
530.000000 MHz	42.6931	31.6117
540.000000 MHz	42.5678	31.2380
550.000000 MHz	42.3655	30.9775

450MHz DUT Evaluation (Body)

Measured Fluid Dielectric Parameters (Muscle)

December 20, 2002

Frequency	e'	e''
350.000000 MHz	60.7614	45.2557
360.000000 MHz	60.5992	44.4327
370.000000 MHz	60.4044	43.5873
380.000000 MHz	60.2459	42.8444
390.000000 MHz	60.0786	42.0832
400.000000 MHz	59.8765	41.4495
410.000000 MHz	59.7041	40.8181
420.000000 MHz	59.5235	40.2162
430.000000 MHz	59.3178	39.6052
440.000000 MHz	59.1906	39.0534
450.000000 MHz	59.0227	38.5610
460.000000 MHz	58.9227	38.0456
470.000000 MHz	58.8270	37.5762
480.000000 MHz	58.6969	37.0585
490.000000 MHz	58.5010	36.6283
500.000000 MHz	58.4492	36.1813
510.000000 MHz	58.3001	35.7544
520.000000 MHz	58.1631	35.3565
530.000000 MHz	57.9980	35.0291
540.000000 MHz	57.9640	34.5410
550.000000 MHz	57.7584	34.2074

APPENDIX F - SAM PHANTOM CERTIFICATE OF CONFORMITY

Schmid & Partner Engineering AG

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

Certificate of conformity / First Article Inspection

Item	SAM Twin Phantom V4.0
Type No	QD 000 P40 BA
Series No	TP-1002 and higher
Manufacturer / Origin	Untersee Composites Hauptstr. 69 CH-8559 Fruthwilen Switzerland

Tests

The series production process used allows the limitation to test of first articles.
Complete tests were made on the pre-series Type No. QD 000 P40 AA, Serial No. TP-1001 and on the series first article Type No. QD 000 P40 BA, Serial No. TP-1006. Certain parameters have been retested using further series units (called samples).

Test	Requirement	Details	Units tested
Shape	Compliance with the geometry according to the CAD model.	IT'IS CAD File (*)	First article, Samples
Material thickness	Compliant with the requirements according to the standards	2mm +/- 0.2mm in specific areas	First article, Samples
Material parameters	Dielectric parameters for required frequencies	200 MHz – 3 GHz Relative permittivity < 5 Loss tangent < 0.05.	Material sample TP 104-5
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards	Liquid type HSL 1800 and others according to the standard.	Pre-series, First article

Standards

[1] CENELEC EN 50361
[2] IEEE P1528-200x draft 6.5
[3] IEC PT 62209 draft 0.9
(*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of [1] and [3].

Conformity

Based on the sample tests above, we certify that this item is in compliance with the uncertainty requirements of SAR measurements specified in standard [1] and draft standards [2] and [3].

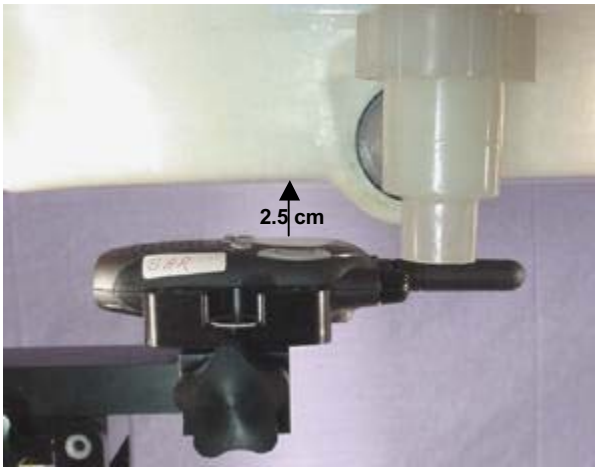
Date 18.11.2001

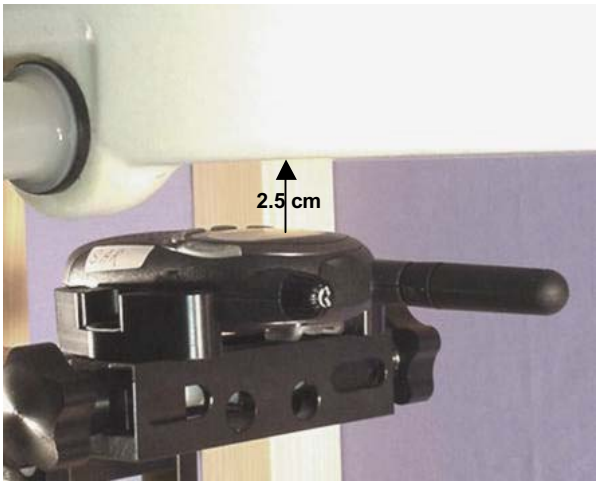
Signature / Stamp Schmid & Partner Engineering AG
Zeughausstrasse 43, CH-8004 Zurich
Tel. +41 1 245 97 00, Fax +41 1 245 97 79

APPENDIX G - SAR TEST SETUP AND DUT PHOTOGRAPHS

FACE-HELD SAR TEST SETUP PHOTOGRAPHS

2.5cm Separation Distance



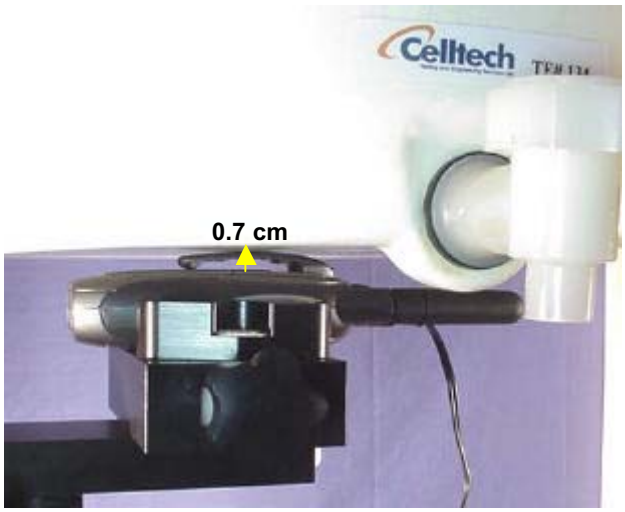


BODY-WORN SAR TEST SETUP PHOTOGRAPHS

with 0.7cm Belt-Clip & Lapel Ear-Microphone Accessory

BODY-WORN SAR TEST SETUP PHOTOGRAPHS

with 0.7cm Belt-Clip & Boom-Microphone Headset Accessory



DUT PHOTOGRAPHS

Front of DUT

Back of DUT & Belt-Clip

DUT with Alkaline Batteries

DUT with MA-EBM Lapel Ear-Microphone

Belt-Clip Front Side

Belt-Clip Back Side

DUT with MA-VOX Boom-Microphone Headset

Left Side of DUT & Belt-Clip

Right Side of DUT & Belt-Clip