



SAR Test Report

No.: SAR_PSION_002_07001_7527BSHC_FCC_Rev1

for the

Psion Teklogix Inc.

Handheld Computer

Model Number: 7527C-BSHC, 7527S-BSHC

FCC ID: GM37527BSHC

IC-ID: 2739D-7527BSHC

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3462B**

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1 Assessment

The Psion Teklogix Inc. 7527 with HC25 Handheld Computer, FCC ID: GM37527BSHC, is in compliance with the limits for general population uncontrolled exposure specified in FCC 2.1093. The device was tested according to measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C (Edition 01-01), IEEE P1528/D1.2, April 21, 2003, Interim SAR Procedures for Release 6 HSPA Devices, FCC – OET, 06/06/2007.

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Revision History:

Report Copy No. 01	Original report.
Report Copy No. 02	Added high and low channels for 850 head SAR values. Changed the co-location configuration to match the two highest SAR values.

2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the SAR Assessment Report

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2.2 Identification of the Client

Applicant's Name:	Psion Teklogix Inc.
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2.3 Identification of the Manufacturer

Manufacturer's Name:	Psion Teklogix Inc.
Manufacturer's Address:	2100 Meadowvale Blvd, Mississauga, ON L5N 7J9, Canada

3 Equipment under Investigation (EUI)

3.1 Identification of the Equipment under Investigation

Product Type	Handheld Computer
Marketing Name:	7527 with HC25
Model No:	7527C-BSHC, 7527S-BSHC
FCC-ID:	GM37527BSHC
IC-ID :	2739D-7527BSHC
Frequency Range:	824 MHz to 849 MHz, 1850 MHz to 1910 MHz, 2402MHz to 2480MHz
Type(s) of Modulation:	GMSK, 8PSK, QPSK, Dual BPSK, CCK, GFSK
Antenna Type:	PCB Ground coupled Meander, 1.96dBi Max
Output Power ¹ :	32.90 dBm (1.950 W) GSM 850 band 23.93 dBm (0.247 W) UMTS FDD5 29.50 dBm (0.891 W) GSM 1900 band 23.39 dBm (0.218 W) UMTS FDD2

¹ For complete power measurements see section 8.1 of this report

4 Subject of Investigation

The 7527C-BSHC, 7527S-BSHC are new Handheld Computers from Psion Teklogix Inc. operating in the 824 MHz to 849 MHz, 1850 MHz to 1910 MHz, 2402MHz to 2480MHz frequency ranges. The objective of the measurements done by Cetecom Inc. was the dosimetric assessment of the device. The tests were performed in configurations for devices operated next to a person's body. The examinations were carried out with the dosimetric assessment system SARA2 described below.

4.1 The IEEE Standard C95.1 and the FCC Exposure Criteria

In the USA the recent FCC exposure criteria [FCC 2001] are based upon the IEEE Standard C95.1 [IEEE 1999]. The IEEE standard C95.1 sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz. In addition, FCC OET - Interim SAR Procedures for HSPA Devices has been used.

4.2 Distinction Between Exposed Population, Duration of Exposure and Frequencies

The American Standard [IEEE 1999] distinguishes between controlled and uncontrolled environment. Controlled environments are locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment or by other cognizant persons. Uncontrolled environments are locations where there is the exposure of individuals who have no knowledge or control of their exposure. The exposures may occur in living quarters or workplaces. For exposure in controlled environments higher field strengths are admissible. In addition the duration of exposure is considered. Due to the influence of frequency on important parameters, as the penetration depth of the electromagnetic fields into the human body and the absorption capability of different tissues, the limits in general vary with frequency.

4.3 Distinction between Maximum Permissible Exposure and SAR Limits

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength E inside the human body, the conductivity σ and the mass density ρ of the biological tissue:

$$SAR = \sigma \frac{E^2}{\rho} = c \frac{\partial T}{\partial t} \Big|_{t \rightarrow 0+}$$

The specific absorption rate describes the initial rate of temperature rise $\partial T / \partial t$ as a function of the specific heat capacity c of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric E and magnetic field strength H and power density S , derived from the SAR limits. The limits for E , H and S have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded.

For the relevant frequency range the maximum permissible exposure may be exceeded if the exposure can be shown by appropriate techniques to produce SAR values below the corresponding limits.

4.4 SAR Limit

In this report the comparison between the American exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 1 g (SAR_{1g}) with the shape of a cube.

Standard	Status	SAR limit (W/kg)
IEEE C95.1	In force	1.6

Table 1: Relevant spatial peak SAR limit averaged over a mass of 1 g

5 The FCC Measurement Procedure

The Federal Communications Commission (FCC) has published a report and order on the 1st of August 1996 [FCC 1996], which requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radiofrequency emissions [FCC 2001]. The Federal Communications Commission (FCC) has published a Preliminary Draft - Interim SAR Procedures for HSPA Devices (06/06/2007).

5.1 General Requirements

The test shall be performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature shall be in the range of 20°C to 26°C and 30-70% humidity..

5.2 Body-worn and Other Configurations

Phantom Requirements

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

Test Position

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration. Devices with a headset output shall be tested with a connected headset.

Test to be performed

For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do. For multiple accessories that do not contain metallic components, the device may be tested only with that accessory which provides the closest spacing to the body. For multiple accessories that contain metallic components, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component, only the accessory that provides the closest spacing to the body must be tested. If the manufacturer provides none body-worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value.

5.3 Procedure for assessing the peak spatial-average SAR

Step 1: Power reference measurement:

Prior to the SAR test, a local SAR measurement should be taken at a user-selected spatial reference point to monitor power variations during testing. For example, this power reference point can be spaced 10 mm or less in the normal direction from the liquid-shell interface and within ± 10 mm transverse to the normal line at the ear reference point.

Step 2: Area scan

The measurement procedures for evaluating SAR associated with wireless handsets typically start with a coarse measurement grid in order to determine the approximate location of the local peak SAR values. This is referred to as the "area scan" procedure. The SAR distribution is scanned along the inside surface of typically half of the head of the phantom but at least larger than the areas projected (normal to the phantom's surface) by the handset and antenna. An example grid is given in Figure 4. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (variation less than ± 1 mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient precision. The distance between the measurement points should enable the detection of the location of local maximum with an accuracy of better than half the linear dimension of the tissue cube after interpolation. The resolution can also be tested using the functions in Annex E (see E.5.2). The approximate locations of the peak SARs should be determined from area scan. Since a given amplitude local peak with steep gradients may produce lower spatial-average SAR than slightly lower amplitude peaks with less steep gradients, it is necessary to evaluate the other peaks as well. However, since the spatial gradients of local SAR peaks are a function of wavelength inside the tissue simulating liquid and incident magnetic field strength, it is not necessary to evaluate peaks that are less than -2 dB of the local maximum. Two-dimensional spline algorithms [Press, et al, 1996], [Brishoual, 2001] are typically used to determine the peaks and gradients within the scanned area. If the peak is closer than one-half of the linear dimension of the 1 g or 10 g tissue cube to the scan border, the measurement area should be enlarged if possible, e.g., by tilting the probe or the phantom (see Figure 5).

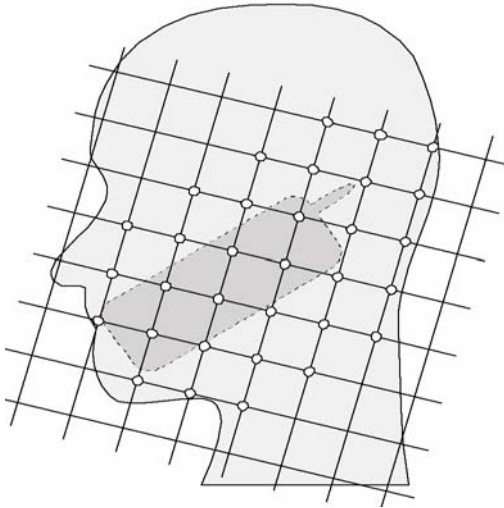


Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

5.3.1.1 Step 3: Zoom scan

In order to assess the peak spatial SAR values averaged over a 1 g and 10 g cube, fine resolution volume scans, called "zoom scans", are performed at the peak SAR locations determined during the "area scan." The zoom scan volume should have at least 1.5 times the linear dimension of either a 1 g or a 10 g tissue cube for whichever peak spatial-average SAR is being evaluated. The peak local SAR locations that were determined in the area scan (interpolated value) should be on the centerline of the zoom scans. The centerline is the line that is normal to the surface and in the center of the volume scan. If this is not possible, the zoom scan can be shifted but not by more than half the dimension of the 1 g or a 10 g tissue cube.

The maximum spatial-average SAR is determined by a numerical analysis of the SAR values obtained in the volume of the zoom scan, whereby interpolation (between measured points) and extrapolation (between surface and closest measured points) routines should be applied. A 3-D-spline algorithm [Press, et al, 1996], [Kreyszig, 1983], [Brishoual, 2001] can be used for interpolation and a trapezoidal algorithm for the integration (averaging). Scan resolutions of larger than 2 mm can be used provided the uncertainty is evaluated according to E (see E.5). In some areas of the phantom, such as the jaw and upper head region, the angle of the probe with respect to the line normal to the surface might become large, e.g., at angles larger than $\pm 30^\circ$ (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced ($<30^\circ$).

5.3.1.2 Step 4: Power reference measurement

The local SAR should be measured at exactly the same location as in Step 1. The absolute value of the measurement drift (the difference between the SAR measured in Step 4 and Step 1) should be recorded in the uncertainty budget. It is recommended that the drift be kept

within $\pm 5\%$. If this is not possible, even with repeat testing, additional information may be used to demonstrate the power stability during the test. Power reference measurements can be taken after each zoom scan, if more than one zoom scan is needed. However, the drift should always be referred to the initial state with fully charged battery.

5.4 Determination of the largest peak spatial-average SAR

In order to determine the largest value of the peak spatial-average SAR of a handset, all device positions, configurations and operational modes should be tested for each frequency band according to steps 1 to 3 below.

Step 1: The tests of 6.4 should be conducted at the channel that is closest to the center of the transmit frequency band (f_c) for:

all device positions (cheek and tilt, for both left and right sides of the SAM phantom, all configurations for each device position in (a), e.g. antenna extended and retracted, and all operational modes for each device position in (a) and configuration in (b) in each frequency band, e.g. analog and digital.

If more than three frequencies need to be tested, (i.e., $N_c > 3$), then all frequencies, configurations and modes must be tested for all of the above positions.

Step 2: For the condition providing highest spatial peak SAR determined in Step 1 conduct all tests of 6.4 at all other test frequencies, e.g. lowest and highest frequencies. In addition, for all other conditions (device position, configuration and operational mode) where the spatial peak SAR value determined in Step 1 is within 3dB of the applicable SAR limit, it is recommended that all other test frequencies should be tested as well².

Step 3: Examine all data to determine the largest value of the peak spatial-average SAR found in Steps 1 to 2.

6 The Measurement System

6.1 Robot system specification

The SAR measurement system being used is the IndexSAR SARA2 system, which consists of a Mitsubishi RV-E2 6-axis robot arm and controller, IndexSAR probe and amplifier and SAM phantom Head Shape. The robot is used to articulate the probe to programmed positions inside the phantom head to obtain the SAR readings from the DUT.

The system is controlled remotely from a PC, which contains the software to control the robot and data acquisition equipment. The software also displays the data obtained from test scans.

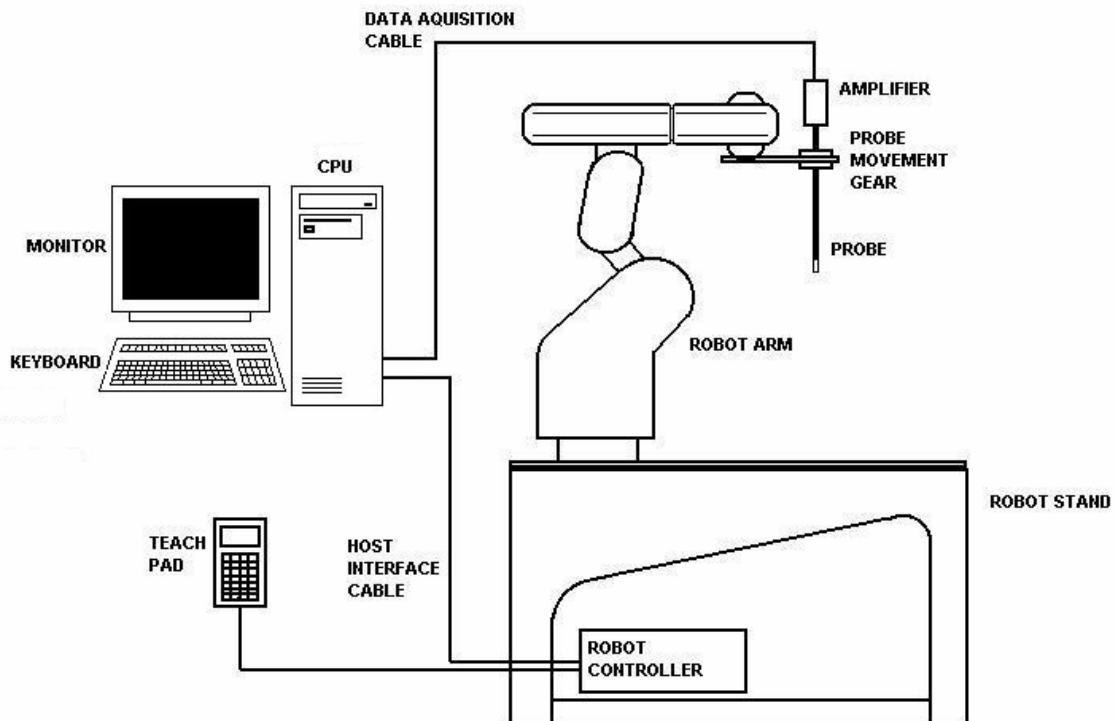


Figure 5: Schematic diagram of the SAR measurement system

The position and digitized shape of the phantom heads are made available to the software for accurate positioning of the probe and reduction of set-up time.

The SAM phantom heads are individually digitized using a Mitutoyo CMM machine to a precision of 0.001mm. The data is then converted into a shape format for the software, providing an accurate description of the phantom shell.

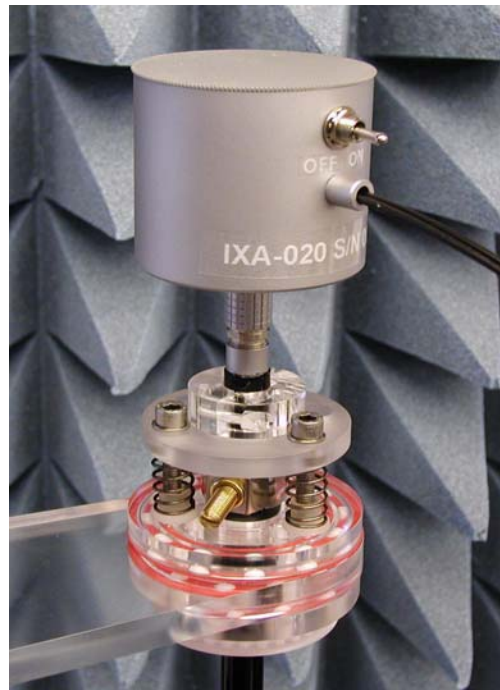
In operation, the system first does an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom. When the maximum SAR point has been found, the system will then carry out a 3D scan centered at that point to determine volume averaged SAR level.

6.2 Probe and amplifier specification

6.2.1 IXP-030 Indexsar isotropic immersible SAR probe

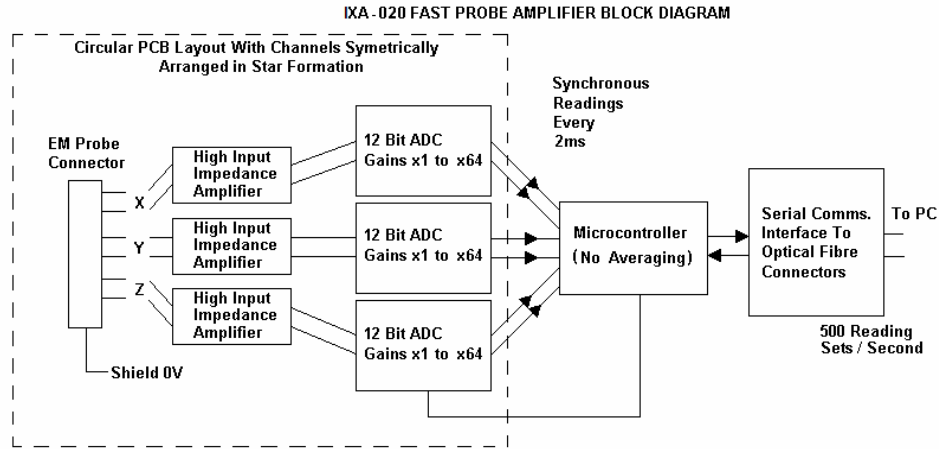
The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in the probe's calibration certificate.

6.2.2 The IXA-020 probe amplifier

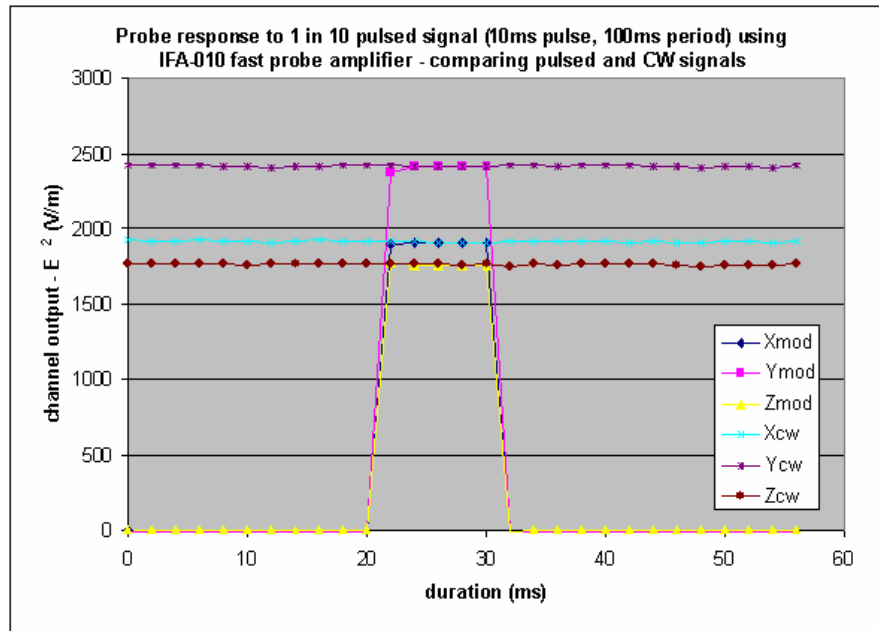


This component is a key component of the measurement system having the basic capability of making simultaneous synchronized measurements of each of the three sensor outputs 500 times per second.

A block diagram of the fast probe amplifier electronics is shown below.



This amplifier has a time constant of approx. $50\mu\text{s}$, which is much faster than the SAR probe response time. The overall system time constant is therefore that of the probe ($<1\text{ms}$) and reading sets for all three channels (simultaneously) are returned every 2ms to the PC. The conversion period is approx. $1\mu\text{s}$ at the start of each 2ms period. This enables the probe to follow pulse modulated signals of periods $\gg 2\text{ms}$. The PC software applies the linearization procedure separately to each reading, so no linearization corrections for the averaging of modulated signals are needed in this case. It is important to ensure that the probe reading frequency and the pulse period are not synchronized and the behavior with pulses of short duration in comparison with the measurement interval need additional consideration.



6.3 Phantoms

The box phantom used for body testing and for validation is manufactured from Perspex. The material is 2 mm in thickness on the test surfaces and 4 mm in thickness on the other surfaces. Its dimensions are: X=21 cm., Y=20.5 cm., Z=17 cm.

6.4 SAR measurement procedure



The major components of the test bench are shown in the picture above.

6.5 SARA2 Interpolation and Extrapolation schemes

SARA2 software contains support for both 2D cubic B-spline interpolation as well as 3D cubic B-spline interpolation. In addition, for extrapolation purposes, a general n-th order polynomial fitting routine is implemented following a singular value decomposition algorithm presented in [4]. A 4th order polynomial fit is used by default for data extrapolation, but a linear-logarithmic fitting function can be selected as an option. The polynomial fitting procedures have been tested

by comparing the fitting coefficients generated by the SARA2 procedures with those obtained using the polynomial fit functions of Microsoft Excel when applied to the same test input data.

6.6 Interpolation of 2D area scan

The 2D cubic B-spline interpolation is used after the initial area scan at fixed distance from the phantom shell wall. The initial scan data are collected with approx. 10mm spatial resolution and spline interpolation is used to find the location of the local maximum to within a 1mm resolution for positioning the subsequent 3D scanning.

6.7 Extrapolation of 3D scan

For the 3D scan, data are collected on a spatially regular 3D grid having (by default) 6.4 mm steps in the lateral dimensions and 3.5 mm steps in the depth direction (away from the source). SARA2 enables full control over the selection of alternative step sizes in all directions.

The digitized shape of the head is available to the SARA2 software, which decides which points in the 3D array are sufficiently well within the shell wall to be 'visited' by the SAR probe. After the data collection, the data are extrapolated in the depth direction to assign values to points in the 3D array closer to the shell wall. A notional extrapolation value is also assigned to the first point outside the shell wall so that subsequent interpolation schemes will be applicable right up to the shell wall boundary.

6.8 Interpolation of 3D scan and volume averaging

The procedure used for defining the shape of the volumes used for SAR averaging in the SARA2 software follow the method of adapting the surface of the 'cube' to conform with the curved inner surface of the phantom (see Appendix D in FCC Supplement C edition 01-01 to OET Bulletin 65 edition 97-01). This is called, here, the conformal scheme.

For each row of data in the depth direction, the data are extrapolated and interpolated to less than 1mm spacing and average values are calculated from the phantom surface for the row of data over distances corresponding to the requisite depth for 10g and 1g cubes. This results in two 2D arrays of data, which are then cubic B-spline interpolated to sub mm lateral resolution. A search routine then moves an averaging square around through the 2D array and records the maximum value of the corresponding 1g and 10g volume averages. For the definition of the surface in this procedure, the digitized position of the headshell surface is used for measurement in head-shaped phantoms. For measurements in rectangular, box phantoms, the distance between the phantom wall and the closest set of girded data points is entered into the software. For measurements in box-shaped phantoms, this distance is under the control of the user. The effective distance must be greater than 2.5mm as this is the tip-sensor distance and to avoid interface proximity effects, it should be at least 5mm. A value of 6 or 8mm is recommended. This distance is called **dbe**.

For automated measurements inside the head, the distance cannot be less than 2.5mm, which is the radius of the probe tip and to avoid interface proximity effects, a minimum clearance distance of x mm is retained. The actual value of db_e will vary from point to point depending upon how the spatially-regular 3D grid points fit within the shell. The greatest separation is when a grid point is just not visited due to the probe tip dimensions. In this case the distance could be as large as the step-size plus the minimum clearance distance (i.e with $x=5$ and a step size of 3.5, db_e will be between 3.5 and 8.5mm).

The default step size (**dstep**) used is 3.5mm, but this is under user-control. The compromise is with time of scan, so it is not practical to make it much smaller or scan times become long and power-drop influences become larger.

The robot positioning system specification for the repeatability of the positioning (**dss**) is +/- 0.04mm.

The phantom shell is made by an industrial moulding process from the CAD files of the SAM shape, with both internal and external moulds. For the upright phantoms, the external shape is subsequently digitized on a Mitutoyo CMM machine (Euro an ultrasonic sensor indicate that the shell thickness (**dph**) away from the ear is 2.0 +/- 0.1mm. The ultrasonic measurements were calibrated using additional mechanical measurements on available cut surfaces of the phantom shells.

For the upright phantom, the alignment is based upon registration of the rotation axis of the phantom on its 253mm diameter baseplate bearing and the position of the probe axis when commanded to go to the axial position. A laser alignment tool is provided (procedure detailed elsewhere). This enables the registration of the phantom tip (**dmis**) to be assured to within approx. 0.2mm. This alignment is done with reference to the actual probe tip after installation and probe alignment. The rotational positioning of the phantom is variable – offering advantages for special studies, but locating pins ensure accurate repositioning at the principal positions (LH and RH ears)..

7 Uncertainty Assessment

Measurement uncertainty values were evaluated for SAR measurements performed by Cetecom Inc. The uncertainty values for components specified in *FCC Supplement C (01-01) to OET Bulletin 65 (97-01)* were evaluated according to the procedures of *IEEE P1528/D1.2 April 21, 2003, NIST 1297 1994 edition and ISO Guide to the Expression of Uncertainty in Measurements (GUM)*.

7.1 Table of Measurement Uncertainty Values of SAR Evaluations

a	b	c	d	e = f(d,k)	f	g = c x f / e	k
Uncertainty Component	Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i (1-g)	1-g u _i (±%)	v _i
Measurement System							
Probe Calibration	E2.1	3.6	N	1	1	3.6	∞
Axial Isotropy	E2.2	4.23	R	√3	(1-cp) ^{1/2}	0.00	∞
Hemispherical Isotropy	E2.2	10.7	R	√3	√c _p	6.18	∞
Boundary Effect	E2.3	1.7	R	√3	1	0.98	∞
Linearity	E2.4	2.92	R	√3	1	1.69	∞
System Detection Limits	E2.5	0.00	R	√3	1	0.00	∞
Readout Electronics	E2.6	0.00	N	1	1	0.00	∞
Response Time	E2.7	0.00	R	√3	1	0.00	∞
Integration Time	E2.8	0.0	R	√3	1	0.23	∞
RF Ambient Conditions	E6.1	0.00	R	√3	1	0.00	∞
Probe Positioner Mechanical Tolerance	E6.2	0.57	R	√3	1	0.33	∞
Probe Positioning with respect to Phantom Shell	E6.3	1.43	R	√3	1	0.83	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	3.6	R	√3	1	2.08	∞
Test sample Related							
Test Sample Positioning	E4.2	4.81	N	1	1	4.81	29
Device Holder Uncertainty	E4.1	0.00	N	1	1	0.00	0
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	√3	1	2.89	∞
Phantom and Tissue Parameters							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	1.43	R	√3	1	0.83	∞
Liquid Conductivity Target - tolerance	E3.2	5.0	R	√3	0.7	2.02	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.0	R	√3	0.7	0.81	∞
Liquid Permittivity Target tolerance	E3.2	5.0	R	√3	0.6	1.73	∞
Liquid Permittivity - measurement uncertainty	E3.3	1.0	R	√3	0.6	0.35	∞
Combined Standard Uncertainty			RSS			± 10.0%	
Expanded Uncertainty (95% CONFIDENCE INTERVAL)			k= 2.00705			± 20.1%	

When there is more than one tolerance for an item the highest tolerance is listed in the table above.

7.2 Table of Measurement Uncertainty Values for SAR System Verification

a	b	c	d	e = f(d,k)	f	g = c x f / e	k
Uncertainty Component	Sec.	Tol. (± %)	Prob. Dist.	Div.	c_i (1-g)	1-g u_i (±%)	v_i or v_{eff}
Measurement System							
Probe Calibration	E2.1	3.6	N	1	1	3.6	∞
Axial Isotropy	E2.2	4.23	R	√3	(1-cp) ^{1/2}	0.00	∞
Hemispherical Isotropy	E2.2	10.7	R	√3	√c _p	6.18	∞
Boundary Effect	E2.3	1.7	R	√3	1	0.98	∞
Linearity	E2.4	2.92	R	√3	1	1.69	∞
System Detection Limits	E2.5	0.00	R	√3	1	0.00	∞
Readout Electronics	E2.6	0.00	N	1	1	0.00	∞
Response Time	E2.7	0.00	R	√3	1	0.00	∞
Integration Time	E2.8	0.0	R	√3	1	0.23	∞
RF Ambient Conditions	E6.1	0.00	R	√3	1	0.00	∞
Probe Positioner Mechanical Tolerance	E6.2	0.57	R	√3	1	0.33	∞
Probe Positioning with respect to Phantom Shell	E6.3	1.43	R	√3	1	0.83	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	3.6	R	√3	1	2.08	∞
Dipole							
Dipole Axis to Liquid Distance	8, E4.2	1.0	R	√3	1	0.58	∞
Input Power and SAR Drift Measurement	8, 6.6.2	2.9	R	√3	1	1.67	∞
Phantom and Tissue Parameters							
Phantom Uncertainty - shell thickness tolerance	E3.1	1.43	R	√3	1	0.83	∞
Liquid Conductivity - deviation from target values	E3.2	5.0	R	√3	0.7	2.02	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.0	R	√3	0.7	0.81	∞
Liquid Permittivity - deviation from target values	E3.2	5.0	R	√3	0.6	1.73	∞
Liquid Permittivity - measurement uncertainty	E3.3	1.0	R	√3	0.6	0.35	∞
Combined Standard Uncertainty			RSS		± 8.47%		
Expanded Uncertainty (95% CONFIDENCE INTERVAL)			k=2		± 16.95%		

8 Test results summary

8.1 Conducted Output Power

8.1.1 GPRS Timeslots

GSM Time Slot Power			
850 Band		Channel 190	
Uplink Timeslots	Ppk [dBm]	Ppk [W]	Pavg [W]
1	32.9	1.95	0.2437
2	31.4	1.38	0.3451

GSM Time Slot Power			
1900 Band		Channel 661	
Uplink Timeslots	Ppk [dBm]	Ppk [W]	Pavg [W]
1	29.5	0.89	0.1114
2	29.5	0.89	0.2228

8.1.2 EGPRS Timeslots

GSM Time Slot Power			
850 Band		Channel 190	
Uplink Timeslots	Ppk [dBm]	Ppk [W]	Pavg [W]
1	27	0.50	0.0626
2	26	0.40	0.0995

GSM Time Slot Power			
1900 Band		Channel 661	
Uplink Timeslots	Ppk [dBm]	Ppk [W]	Pavg [W]
1	25.9	0.39	0.0486
2	25.9	0.39	0.0973

8.1.3 FDD5 Voice

Channel	Frequency [MHz]	ARM [dBm]	RMC [dBm]
4132	826.4	23.75	23.78
4175	835	23.67	23.76
4233	846.6	23.77	23.83

UMTS Voice mode, 12.2kbps ARM with 3.4kb SRB, 12.2kbps RMC, TPC bits all 1's

8.1.4 FDD5 Data

Channel	Frequency [MHz]	Sub-test 1		Sub-test 2		Sub-test 3		Sub-test 4	
		HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]
4132	826.4	23.27	23.2	23.07	23.31	23.26	23.29	22.5	22.71
4175	835	23.3	23.93	23.24	23.27	23.29	23.38	22.81	22.88
4233	846.6	23.7	23.65	23.33	23.46	23.59	23.69	23.1	23.06

Subtests defined in 8.1.7

8.1.5 FDD2 Voice

Channel	Frequency [MHz]	ARM [dBm]	RMC [dBm]
9262	1852.4	22.53	23.02
9400	1880	22.77	23.39
9538	1907.5	22.63	23.25

UMTS Voice mode, 12.2kbps ARM with 3.4kb SRB, 12.2kbps RMC, TPC bits all 1's

8.1.6 FDD2 Data

Channel	Frequency [MHz]	Sub-test 1		Sub-test 2		Sub-test 3		Sub-test 4	
		HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]	HSDPA [dBm]	UMTS [dBm]
9262	1852.4	22.29	23.26	21.15	20.93	20.17	19.97	19.08	18.89
9400	1880	22.52	23.14	21.39	21.18	20.75	20.54	19.42	19.31
9538	1907.5	22.69	22.80	21.03	20.78	20.67	20.49	19.47	19.42

Subtests defined in 8.1.7

8.1.7 Subtests

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

8.2 Test Positions and Configurations

Head positions were left touch, left 15° tilt, right touch and right 15° tilt. There was one body position with the belt clip touching the flat phantom. See Appendix B for photos. The only difference between the 7527S and the 7527C is a bigger keypad. The antenna and radios are the same and in the same place. SAR was performed on the 7527S with spot checks on the 7527C for each band. If the resulting SAR values on the middle channel were 3 dB below the limit, the high and low channels were not evaluated.

8.3 GPRS Operating Mode

The 7527 Handheld computer contains the Siemens HC25 modem. HC25 supports GPRS class 10. The modem implements power reduction schemes, but the reduction is less than 2dB when two timeslots transmit. Body SAR was tested with two uplink timeslots. EGPRS was tested in the same manner.

8.4 WCDMA Operating Mode

The HC25 modem supports WCDMA FDD II / FDD V bands with HSDPA. Head SAR measurements were performed with 12.2kbps RMC and TPC bits all 1's. SAR in AMR configurations was not performed since the output power was never ¼ dB higher than that measured in 12.2kbps RMC. Body SAR was performed with TPC bits all 1's, H-set 1, 12.2kbps RMC, Sub-test 1, Test Loop Mode 1, QPSK, and HSDPA disabled. This setup reflected the highest output power shown in section 8.1.4 and 8.1.6.

8.5 WLAN Operating Mode

The 7527 Handheld computer contains the RA2041 WLAN module with FCC ID GM37527RA2041. The module has already been approved with the 7527, see report FA710210-2-2-03 from SPORTON International Inc. Only co-location measurements were performed.

8.6 Co-location

BT was enabled for all measurements, transmitting at max power at 2480MHz.

Co-location between WLAN module and the GSM modem were performed in a head position and the body position. The configuration for WLAN was channel 6 transmitting on the main antenna, b mode, 11Mbps. The Left Tilt position was used for the head co-location using channel 128 in the 850 band, using the 7527C device. For the body co-location channel 661 in the 1900 band was used with the 7527S device.

8.7 Head SAR results for GSM 850MHz band for 7527 with HC25

S/C	EAR	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Left	Touch	MID #190	836.6	0.690	Plot 1	Photo 1
7527S	Left	15 degree	MID #190	836.6	0.840	Plot 2	Photo 2
7527S	Right	Touch	MID #190	836.6	0.329	Plot 3	Photo 3
7527S	Right	15 degree	MID #190	836.6	0.453	Plot 4	Photo 4
7527C	Left	15 degree	MID #190	836.6	0.948	Plot 5	Photo 5
7527C	Left	15 degree	LOW #128	824.2	1.042	Plot 6	Photo 5
7527C	Left	15 degree	HIGH #251	848.8	0.818	Plot 7	Photo 5

8.8 Head SAR results for GSM 1900MHz band for 7527 with HC25

S/C	EAR	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Left	Touch	MID #661	1880	0.385	Plot 8	Photo 1
7527S	Left	15 degree	MID #661	1880	0.622	Plot 9	Photo 2
7527S	Right	Touch	MID #661	1880	0.218	Plot 10	Photo 3
7527S	Right	15 degree	MID #661	1880	0.241	Plot 11	Photo 4
7527C	Left	15 degree	MID #661	1880	0.293	Plot 12	Photo 5

8.9 Head SAR results for UMTS 850MHz band for 7527 with HC25

S/C	EAR	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Left	Touch	MID #4175	835	0.306	Plot 13	Photo 1
7527S	Left	15 degree	MID #4175	835	0.431	Plot 14	Photo 2
7527S	Right	Touch	MID #4175	835	0.154	Plot 15	Photo 3
7527S	Right	15 degree	MID #4175	835	0.199	Plot 16	Photo 4
7527C	Left	15 degree	MID #4175	835	0.546	Plot 17	Photo 5

8.10 Head SAR results for UMTS 1900MHz band for 7527 with HC25

S/C	EAR	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Left	Touch	MID #9400	1880	0.371	Plot 18	Photo 1
7527S	Left	15 degree	MID #9400	1880	0.528	Plot 19	Photo 2
7527S	Right	Touch	MID #9400	1880	0.233	Plot 20	Photo 3
7527S	Right	15 degree	MID #9400	1880	0.349	Plot 21	Photo 4
7527C	Left	15 degree	MID #9400	1880	0.366	Plot 22	Photo 5

8.11 Body SAR results for GPRS 850MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #190	836.6	0.064	Plot 23	Photo 6
7527C	Back with clip	MID #190	836.6	0.058	Plot 24	Photo 7

8.12 Body SAR results for GPRS 1900MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #661	1880	0.072	Plot 25	Photo 6
7527C	Back with clip	MID #661	1880	0.057	Plot 26	Photo 7

8.13 Body SAR results for EGPRS 850MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #190	836.6	0.051	Plot 27	Photo 6

8.14 Body SAR results for EGPRS 1900MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #661	1880	0.049	Plot 28	Photo 6

8.15 Body SAR results for UMTS 850MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #4175	835	0.069	Plot 29	Photo 6
7527C	Back with clip	MID #4175	835	0.054	Plot 30	Photo 7

8.16 Body SAR results for UMTS 1900MHz band for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #9400	1880	0.046	Plot 31	Photo 6
7527C	Back with clip	MID #9400	1880	0.064	Plot 32	Photo 7

8.17 Co-location head SAR results for 802.11b and GSM for 7527 with HC25

S/C	EAR	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527C	Left	15 degree	LOW #128 / MID #6	824.2 / 2437	1.045	Plot 33	Photo 5

8.18 Co-location body SAR results for 802.11b and GPRS for 7527 with HC25

S/C	HANDSET POSITION	CHANNEL NUMBER	FREQUENCY (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
7527S	Back with clip	MID #661 / MID #6	1880 / 2437	0.101	Plot 34	Photo 6

8.19 Dipole Validation Check Results

Prior to formal testing at each frequency a system verification was performed in accordance with IEEE 1528. The balanced dipole source was placed at the specified distance in horizontal orientation. All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

Date	Frequency (MHz)	CW input at dipole feed (Watts)	1g SAR (W/kg)	1 Watt reference SAR value from IEEE 1528 (W/kg)	Difference reference SAR value to normalized SAR
12/06/2007	835	1.0	10.089	9.5	6.2%
12/07/2007	1900	1.0	41.375	39.7	4.22%
1/31/2008	835	1.0	10.004	9.5	5.31%

9 References

1. [FCC 2001] Federal Communications Commission: Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01), FCC, 2001.
2. [IEEE 1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, Inst. of Electrical and Electronics Engineers, Inc., 1999.
3. [IEEE 200x] IEEE Std 1528-200x: DRAFT Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques. Draft 6.2, Inst. of Electrical and Electronics Engineers, Inc., 2000.
4. [NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results, Technical Note 1297 (TN1297), United States Department of Commerce Technology Administration, National Institute of Standards and Technology, 1994.
5. Interim SAR Procedures for Release 6 HSPA Devices, FCC – OET, 06/06/2007