ITS Intertek Testing Services
ETL SEMKO

Specific Absorption Rate (SAR) Test Report
for
Symbol Technologies, Inc.
on the
Spread Specrtum Radio Card
Model: LA 4137

Test Report: 20520091
Date of Report: June 22, 2001

Job #: 20052009
Date of Test: June 11-12, 2001

Total number of pages in report: 47

NVLAP®

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Tested by:	Xi-Ming Yang	Review Date: 6/26/01
Reviewed by: David Chemomordik	David Chemomordik EMC Site Manager	Review Date: 6/26/01

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1.0 JOB DESCRIPTION

1.1 Client Information

The EUT has been tested at the request of:

Company:	Symbol Technologies, Inc.
Address:	6480 Via Del Oro San Jose, CA 95119-1208 USA
Name of contact:	Mr. Norm Nelson
Telephone:	(408) 528-2649
Fax:	(408) 528-2740

1.2 Equipment under test (EUT)

Product Descriptions:

Equipment	Spread Specrtum WLAN Compact Flash Card		
Trade Name	Symbol Technologies, Inc.	Model No:	LA 4137
FCC ID	H9PLA4137P	S/N No.	Not Labeled
Category	Portable	RF Exposure	Uncontrolled Environment
Frequency Band (up link)	2412 - 2462 MHz	System	DSSS
Antenna Type	Integrated, PCB Chip, Model Trilogy CF, 2 dBi gain		
Location:	Installed in a Laptop Computer		

Note: For details on antennas see Appendix C

Use of Product : Wireless Data Communications

Manufacturer: Symbol Technologies, Inc.

Production is planned [X] Yes, [ ] No

EUT receive date: June 6, 2001

EUT received condition: Prototype in good condition.

Test start date: June 11, 2001

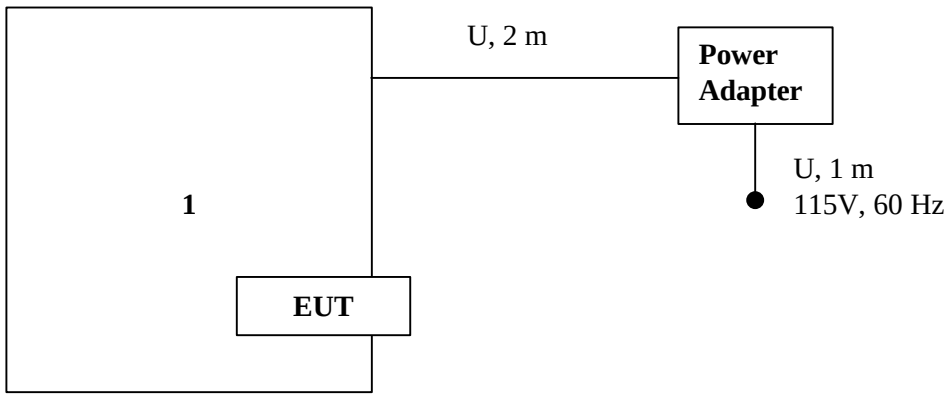
Test end date: June 12, 2001

1.3 Test plan reference

FCC rule part 2.1093, FCC Docket 96-326 & Supplement C to OET Bulletin 65

1.4 System test configuration
1.4.1 System block diagram & Support equipment

Item #	Description	Model No.	Serial No.
1	Compaq Laptop Computer	Armada E500	AE5 P3700T5X12VC64N2



U: Unshielded Cable
m: Length in meters

1.4.3 Test Position for Muscle

The LA 4131 was configured for testing in a typical fashion (as a customer would normally use it), and in the confines as outlined in C95.1 (1992) and Supplement C of OET 65 (1998). Please refer to figures 1 – 3 below for the position details:

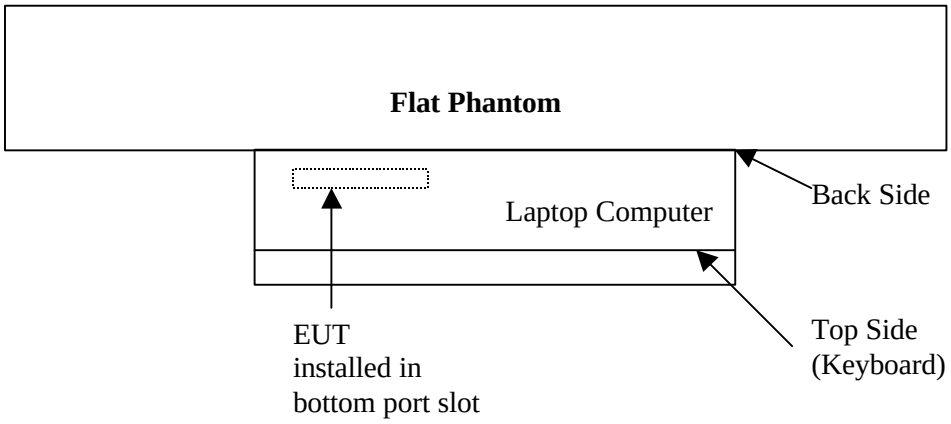


Figure 1: laptop upside down (face down, closed)

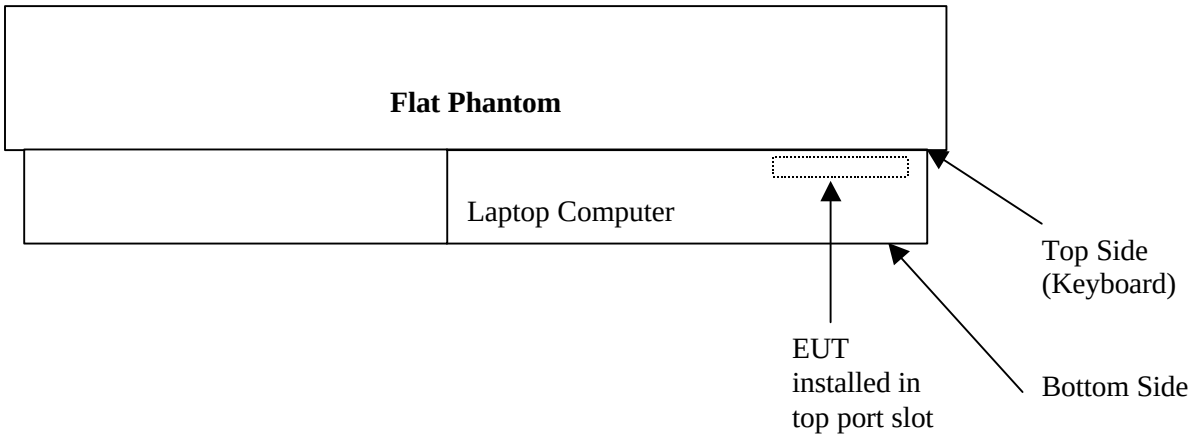


Figure 2: laptop in normal position (face up, open)

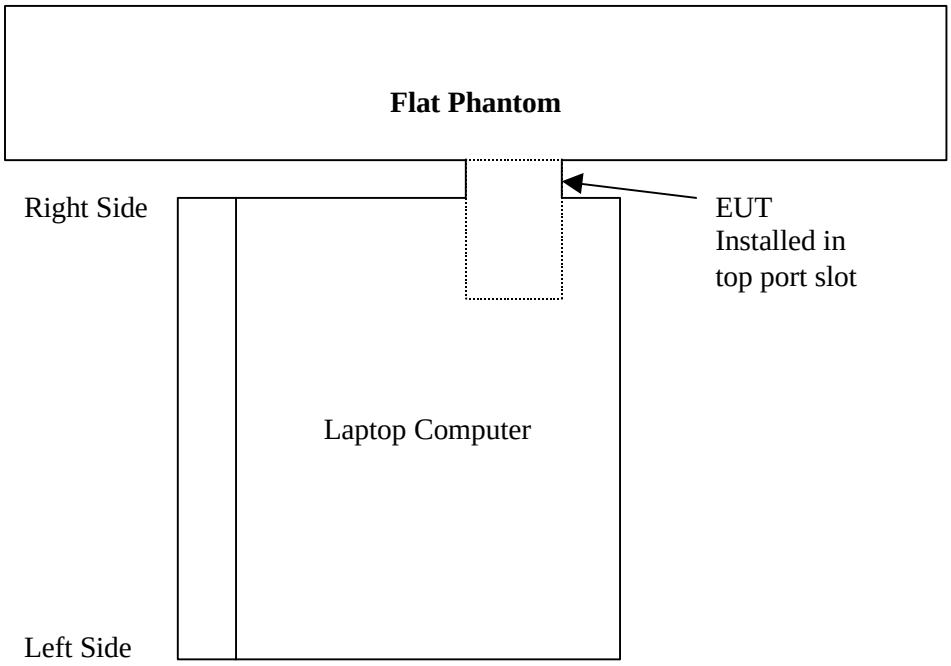


Figure 3: laptop in vertical position

1.4.4 Test Condition

During tests, the worst case data (max. RF coupling) was determined with following conditions:

EUT Antenna	Internal	Orientation	Flat (Muscle)
Usage	Body	Distance between antenna and the phantom surface:	19.8 mm with laptop in upside down position. 1.3 mm with laptop in normal position. 0 mm with laptop in vertical position
Simulating human hand	Not Used	EUT power	EUT is powered from laptop
Power output	19.5 dBm – output, 21.5 dBm - EIRP		

The spatial peak SAR values were accessed for lowest, middle and highest operating channels defined by the manufacturer.

1.5 Modifications required for compliance

No modifications were implemented by Intertek Testing Services.

1.6 Additions, deviations and exclusions from standards

No additions, deviations or exclusions have been made from standard.

2.0 SAR EVALUATION

2.1 SAR Limits

The following FCC limits for SAR apply to devices operate in General Population/Uncontrolled Exposure environment:

EXPOSURE (General Population/Uncontrolled Exposure environment)	**SAR (W/kg)**
Average over the whole body	0.08
Spatial Peak (1g)	1.60
Spatial Peak for hands, wrists, feet and ankles (10g)	4.00

2.2 Configuration Photographs

SAR measurement Test Setup
Laptop in normal position

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Laptop in normal position

.2 Configuration Photographs – Continued

SAR Measurement Test Setup
Laptop upside down

2.2 Configuration Photographs – Continued

SAR Measurement Test Setup
Laptop in vertical position

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Picture of EUT

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Picture of EUT

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Picture of EUT

2.2 Configuration Photographs Continued

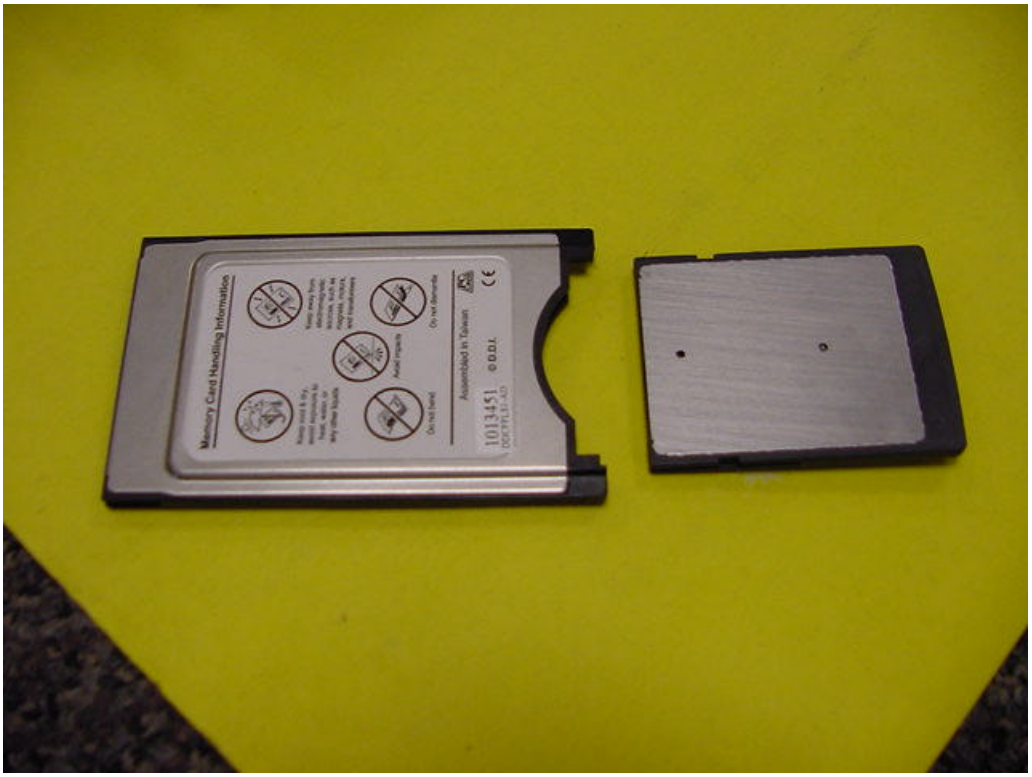
SAR Measurement Test Setup
Picture of EUT

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Picture of EUT

2.2 Configuration Photographs Continued

SAR Measurement Test Setup
Picture of EUT



2.3 System Verification

Prior to the assessment, the system was verified to the ±5% of the specifications by using the system validation kit. The validation was performed at 1800 MHz.

Validation kit	Targeted SAR_{1g} (mW/g)	Measured SAR_{1g} (mW/g)
D900V2, S/N #: 013	9.45	9.30

2.4 Evaluation Procedures

The SAR evaluation was performed with the following procedures:

a. SAR was measured at a fixed location above the ear point and used as a reference value for the assessing the power drop.

b. The SAR distribution at the exposed side of the head was measured at a distance of 4.0 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20 mm x 20 mm. Based on this data, the area of the maximum absorption was determined by spline interpolation.

c. Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. Based on this data set, the spatial peak SAR value was evaluated with the following procedure:

   I) The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measurement point is 1.6 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in Z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.

   ii) The maximum 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 3-D spline interpolation algorithm. The 3-D spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y and z directions). The volume was integrated with the trapezoidal algorithm. 1000 points (10 x 10 x 10) were interpolated to calculate the average.

   iii) All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

d. Re-measurements of the SAR value at the same location as in step a. above. If the value changed by more than 5 %, the evaluation was repeated.

2.5 Test Results

The following pages contain data tables with the test results obtained when the device was tested in the condition described in this report. Detailed measurement plots, which reveal information about the location of the maximum SAR with respect to the device, are reported in Appendix A.

Trade Name:	Symbol Technologies Inc	**Model No.:**	LA 4137
Serial No.:	Not Labeled	**Test Engineer:**	Xi-Ming Yang

TEST CONDITIONS			
Ambient Temperature	22 °C	Relative Humidity	48 %
Test Signal Source	Test Mode	Signal Modulation	CW
Output Power Before SAR Test	19.5 dBm	Output Power After SAR Test	19.5 dBm
Test Duration	23 Min.	Number of Battery Change	Laptop connected to AC power

EUT Position: Laptop upside down (face down)					
Channel MHz	Operating Mode	Crest Factor	Measured SAR_{1g} (mW/g)	Limit SAR (W/kg)	Plot Number
2412	DSSS	1	0.0603	1.6	1
2437	DSSS	1	0.0326	1.6	2
2462	DSSS	1	0.0267	1.6	3

EUT Position: Laptop in normal position (face up)					
Channel MHz	Operating Mode	Crest Factor	Measured SAR_{1g} (mW/g)	Limit SAR (W/kg)	Plot Number
2412	DSSS	1	1.37	1.6	4
2437	DSSS	1	0.774	1.6	5
2462	DSSS	1	0.751	1.6	6

EUT Position: Laptop in vertical position					
Channel MHz	Operating Mode	Crest Factor	Measured SAR_{1g} (mW/g)	Limit SAR (W/kg)	Plot Number
2412	DSSS	1	1.47	1.6	7
2437	DSSS	1	0.761	1.6	8
2462	DSSS	1	0.712	1.6	9

Notes: a) Worst case data reported
b) Uncertainty of the system is not included

3.0 EQUIPMENT

3.1 Equipment List

The Specific Absorption Rate (SAR) tests were performed with the SPEAG model DASY 3 automated near-field scanning system, which is a package, optimized for dosimetric evaluation of mobile radios [3].

The following major equipment/components were used for the SAR evaluations:

SAR Measurement System			
EQUIPMENT	SPECIFICATIONS	S/N #	LAST CAL. DATE
Robot	**Stäubi RX60L**	597412-01	N/A
	Repeatability: ± 0.025mm Accuracy: $0.806x10^{-3}$ degree Number of Axes: 6		
E-Field Probe	**ET3DV4**	1122	03/19/01
	Frequency Range: 10 MHz to 6 GHz Linearity: ± 0.2 dB Directivity: ± 0.1 dB in brain tissue		
Data Acquisition	**DAE3**	317	N/A
	Measurement Range: 1µV to >200mV Input offset Voltage: < 1µV (with auto zero) Input Resistance: 200 M		
Phantom	**Generic Twin V3.0**	N/A	N/A
	Type: Generic Twin, Homogenous Shell Material: Fiberglass Thickness: 2 ± 0.1 mm Capacity: 20 liter Ear spacer: 4 mm (between EUT ear piece and tissue simulating liquid)		
Simulated Tissue	**Mixture**	N/A	6/10/01
	Please see section 6.2 for details		
Power Meter	**HP 8900D** w/ 84811A sensor	3607U00673	08/01/00
	Frequency Range: 100kHz to 18 GHz Power Range: 300µW to 3W		

3.2 Tissue Simulating Liquid

Muscle	
Ingredient	**Frequency** (2440 MHz)
Water	55.5 %
Sugar	43.5 %
Salt	0 %
Cellulose	1.0 %

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	**ε_r***	**σ *(mho/m)**	**ρ **(kg/m$^{3)}$**
2440	52.2 ± 5%	2.15 ± 10%	1000

* *Worst case uncertainty of the HP 85070A dielectric probe kit*
** *Worst case assumption*

Note: The amount of each ingredient specified in the table is not the exact amount of the final test solution. The final test solution was adjusted by adding small amounts of water, sugar, and/or salt to calibrate the solution to meet the proper dielectric parameters.

3.3 E-Field Probe Calibration

Probes were calibrated by the manufacturer in an IFI Model 110 TEM Cell. To ensure consistency, a strict protocol was followed. The conversion factor (ConF) between this calibration and the measurement in the tissue simulation solution was performed by comparison with temperature measurement and computer simulations. Probe calibration factors are included in Appendix B.

3.4 Measurement Uncertainty

The uncertainty budget has been determined for the DASY3 measurement system according to the NIS81 [5] and the NIST 1297 [6] documents and is given in the following table. The extended uncertainty (K=2) was assessed to be 23.5 %

UNCERTAINTY BUDGET				
Uncertainty Description	**Error**	**Distrib.**	**Weight**	**Std.Dev.**
Probe Uncertainty				
Axial isotropy	±0.2 dB	U-shape	0.5	±2.4 %
Spherical isotropy	±0.4 dB	U-shape	0.5	±4.8 %
Isotropy from gradient	±0.5 dB	U-shape	0	
Spatial resolution	±0.5 %	Normal	1	±0.5 %
Linearity error	±0.2 dB	Rectang.	1	±2.7 %
Calibration error	±3.3 %	Normal	1	±3.3 %
SAR Evaluation Uncertainty				
Data acquisition error	±1 %	Rectang.	1	±0.6 %
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %
Conductivity assessment	±10 %	Rectang.	1	±5.8 %
Spatial Peak SAR Evaluation Uncertainty				
Extrapol boundary effect	±3 %	Normal	1	±3 %
Probe positioning error	±0.1 mm	Normal	1	±1 %
Integrat. And cube orient	±3 %	Normal	1	±3 %
Cube shape inaccuracies	±2 %	Rectang.	1	±1.2 %
Device positioning	±6 %	Normal	1	±6 %
Combined Uncertanties				**±11.7 %**

3.5 Measurement Traceability

All measurements described in this report are traceable to National Institute of Standards and Technology (NIST) standards or appropriate national standards.

4.0 WARNING LABEL INFORMATION - USA

See attached users manual.

5.0 REFERENCES

[1] ANSI, ANSI/IEEE C95.1-1991: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 GHz, The Institute of electrical and Electronics Engineers, Inc., New York, NY 10017, 1992

[2] Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997

[3] Thomas Schmid, Oliver Egger, and Niels Kuster, "Automated E-field scanning system for dosimetric assessments", *IEEE Transaction on Microwave Theory and Techniques*, vol. 44, pp. 105-113, Jan. 1996.

[4] Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetic evaluation of mobile communications equipment with know precision", IEICE Transactions on Communications, vol. E80-B, no. 5, pp.645-652, May 1997.

[5] NIS81, NAMAS, "The treatment of uncertainty in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddinton, Middlesex, England, 1994.

[6] Barry N. Tayor and Chris E. Kuyatt, "Guidelines for evaluating and expressing the uncertainty of NIST measurement results", Tech. Rep., National Institute of Standards and Technology, 1994.

6.0 Document History

Revision/ Job Number	Writer Initials	Date	Change
1.0 / 2046983A1	SS	May 9, 2001	Original document

APPENDIX A - SAR Evaluation Data

Please note that the graphical visualization of the phone position onto the SAR distribution gives only limited information on the current distribution of the device, since the curvature of the head results in graphical distortion. Full information can only be obtained either by H-field scans in free space or SAR evaluation with a flat phantom.

Power drift is the measurement of power drift of the device over one complete SAR scan.

APPENDIX B - E-Field Probe Calibration Data

See attached pages.

Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland, Phone +41 1 245 97 00, Fax +41 1 245 97 79

Replacement Probe

Dosimetric E-Field Probe

Type:	**ET3DV4**
Serial Number:	**1122**
Place of Calibration:	**Zurich**
Date of Calibration:	**Mar. 19, 2001**
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:

Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland, Telephone +41 1 245 97 00, Fax +41 1 245 97 79

Probe ET3DV4

SN:1122

Manufactured:	February 1, 1996
Last calibration:	September 21, 1999
Recalibrated:	March 17, 2001

Calibrated for System DASY3

ET3DV4 SN:1122

DASY3 - Parameters of Probe: ET3DV4 SN:1122

Sensitivity in Free Space

NormX	2.28 $\mu V/(V/m)^2$
NormY	2.53 $\mu V/(V/m)^2$
NormZ	2.44 $\mu V/(V/m)^2$

Diode Compression

DCP X	99 mV
DCP Y	99 mV
DCP Z	99 mV

Sensitivity in Tissue Simulating Liquid

Head **450 MHz** $\varepsilon_r = 43.5 \pm 5\%$ $\sigma = 0.87 \pm 10\%$ mho/m

ConvF X	6.02 extrapolated	Boundary effect:	
ConvF Y	6.02 extrapolated	Alpha	0.24
ConvF Z	6.02 extrapolated	Depth	3.20

Head **900 MHz** $\varepsilon_r = 42 \pm 5\%$ $\sigma = 0.97 \pm 10\%$ mho/m

ConvF X	5.65 ± 7% (k=2)	Boundary effect:	
ConvF Y	5.65 ± 7% (k=2)	Alpha	0.37
ConvF Z	5.65 ± 7% (k=2)	Depth	2.85

Brain **1500 MHz** $\varepsilon_r = 41 \pm 5\%$ $\sigma = 1.32 \pm 10\%$ mho/m

ConvF X	5.16 interpolated	Boundary effect:	
ConvF Y	5.16 interpolated	Alpha	0.53
ConvF Z	5.16 interpolated	Depth	2.40

Brain **1800 MHz** $\varepsilon_r = 41 \pm 5\%$ $\sigma = 1.69 \pm 10\%$ mho/m

ConvF X	4.92 ± 7% (k=2)	Boundary effect:	
ConvF Y	4.92 ± 7% (k=2)	Alpha	0.61
ConvF Z	4.92 ± 7% (k=2)	Depth	2.17

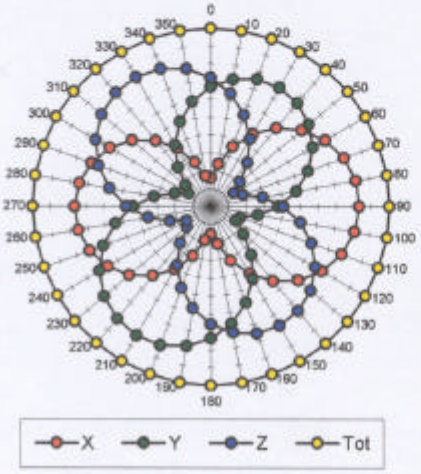
Sensor Offset

Probe Tip to Sensor Center	2.7	mm
Optical Surface Detection	1.5 ± 0.2	mm

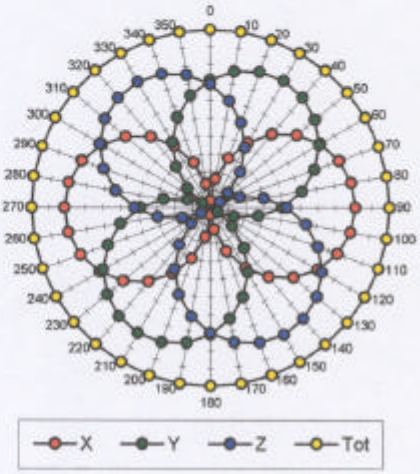
ET3DV4 SN:1122

Receiving Pattern (ϕ), θ = 0°

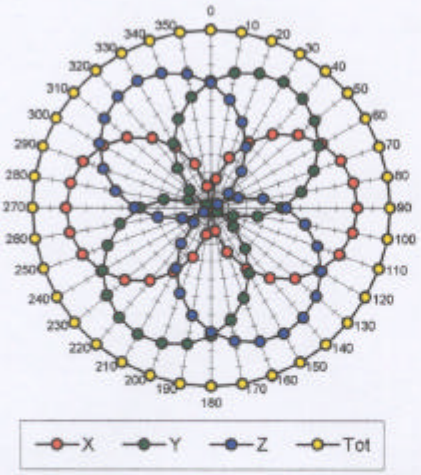
f = 30 MHz, TEM cell ifi110



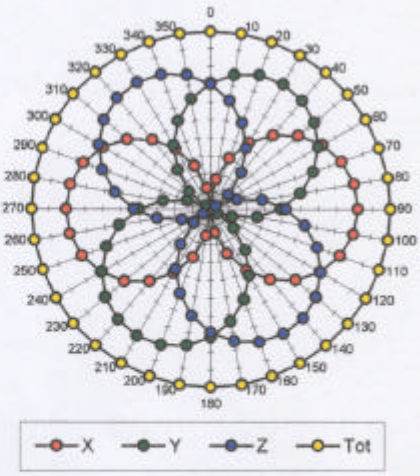
f = 100 MHz, TEM cell ifi110



f = 300 MHz, TEM cell ifi110



f = 900 MHz, TEM cell ifi110



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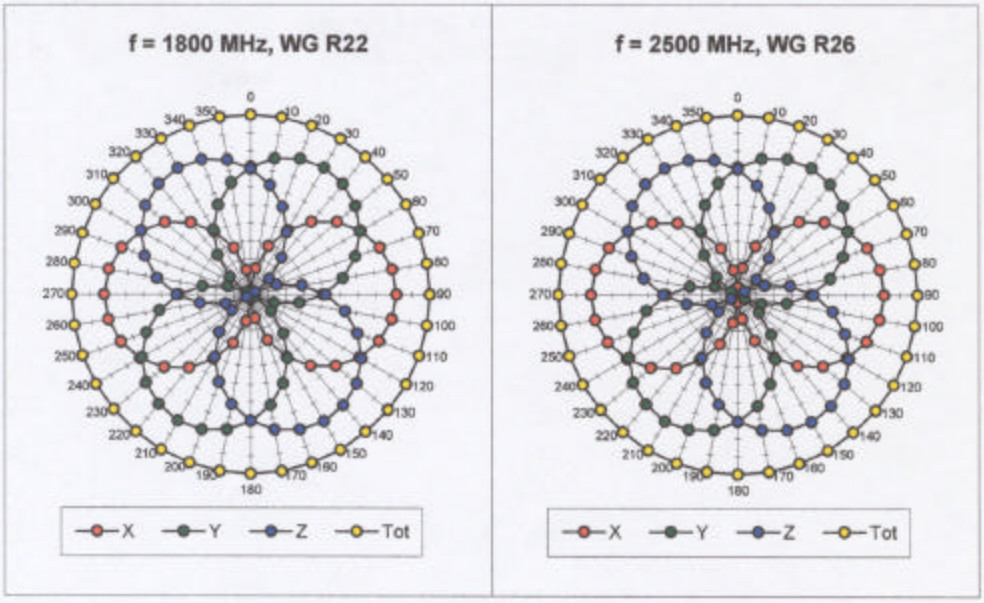
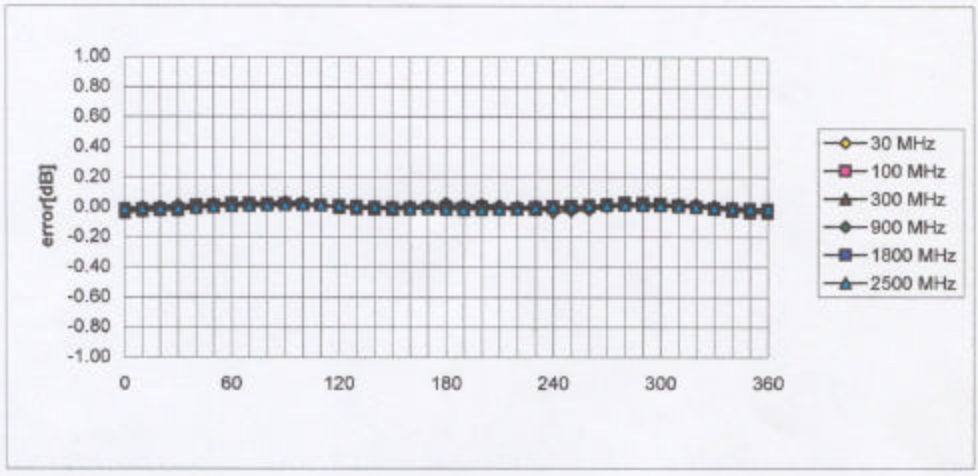


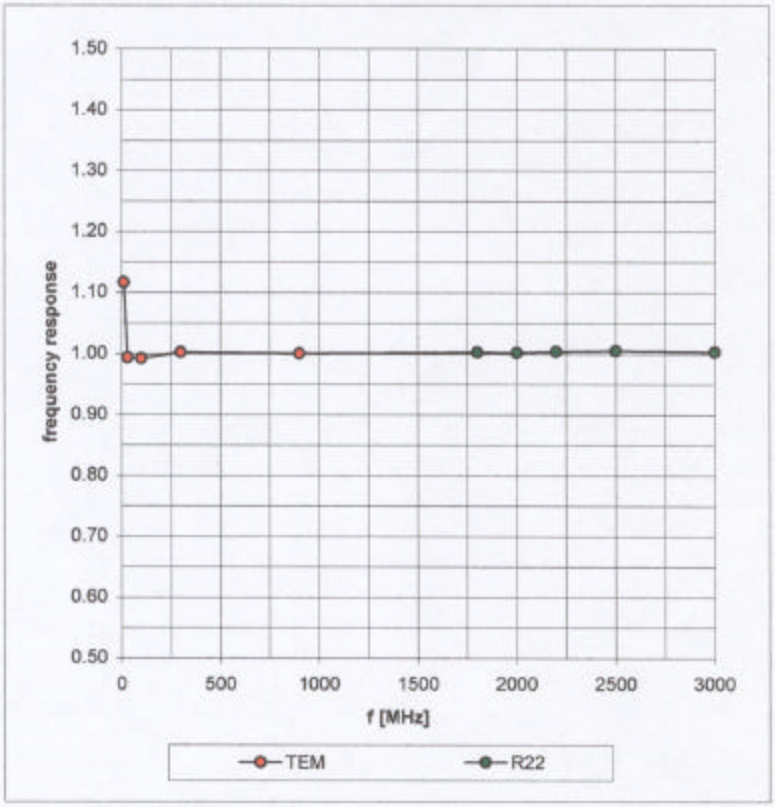
Isotropy Error (ϕ), θ = 0°



ET3DV4 SN:1122

Frequency Response of E-Field

(TEM-Cell:ifi110, Waveguide R22)



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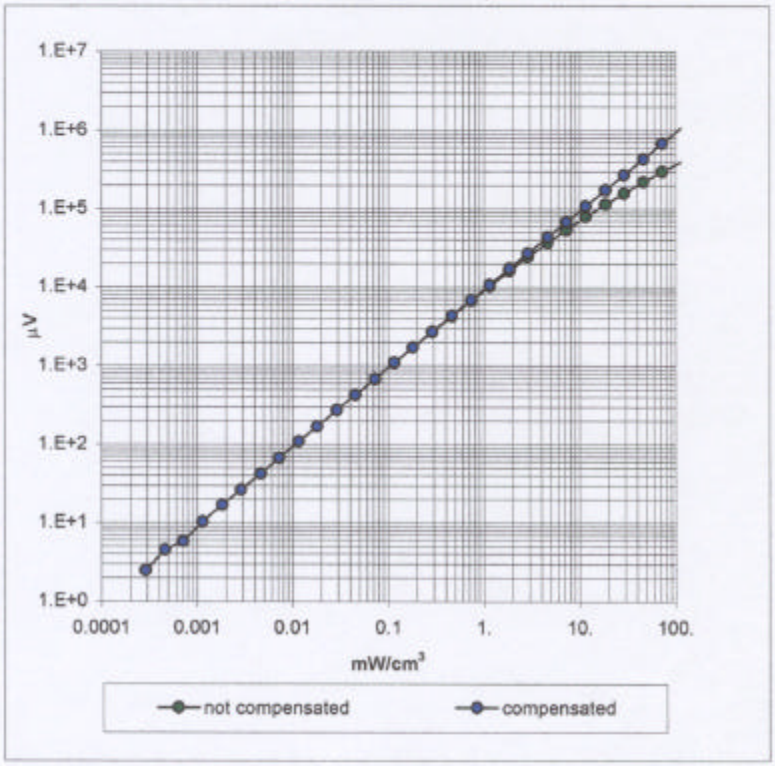
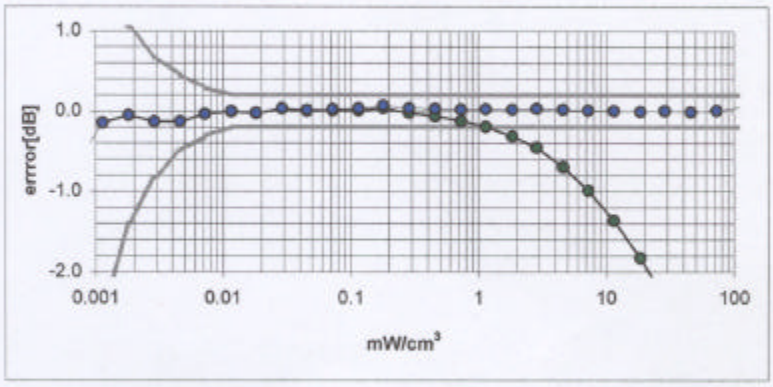
ET3DV4 SN:1122

Dynamic Range f(SAR_{brain})

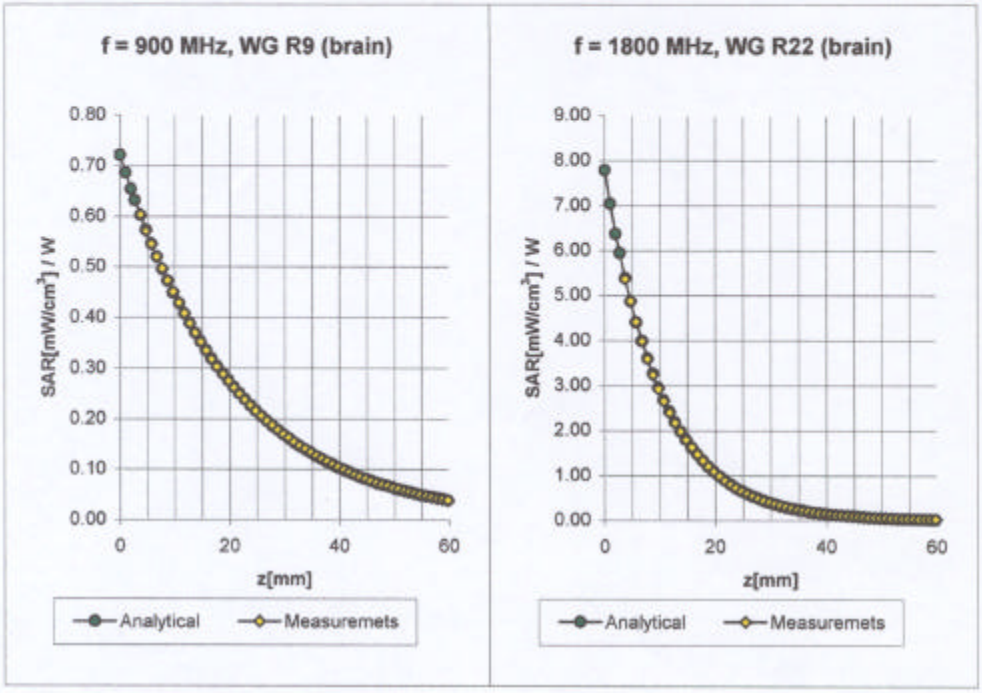
(TEM-Cell:ifi110)





ET3DV4 SN:1122

Conversion Factor Assessment



Brain **900 MHz** ε_r = 42.5 ± 5% σ = 0.86 ± 10% mho/m

ConvF X	**5.62** ± 7% (k=2)	Boundary effect:	
ConvF Y	**5.62** ± 7% (k=2)	Alpha	**0.39**
ConvF Z	**5.62** ± 7% (k=2)	Depth	**2.63**

Brain **1800 MHz** ε_r = 41 ± 5% σ = 1.69 ± 10% mho/m

ConvF X	**4.92** ± 7% (k=2)	Boundary effect:	
ConvF Y	**4.92** ± 7% (k=2)	Alpha	**0.61**
ConvF Z	**4.92** ± 7% (k=2)	Depth	**2.17**

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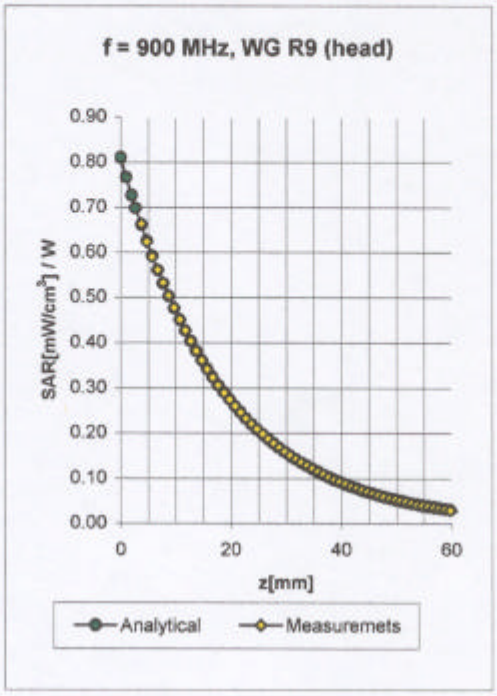
Conversion Factor Assessment



Head **900 MHz** ε_r = 42 ± 5% σ = 0.97 ± 10% mho/m

ConvF X	**5.65** ± 7% (k=2)	Boundary effect:	
ConvF Y	**5.65** ± 7% (k=2)	Alpha	**0.37**
ConvF Z	**5.65** ± 7% (k=2)	Depth	**2.85**

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