SGS TESTING KOREA

TEST – REPORT

SAR Compliance Test Report

Test report no.:

STROS-05-002

SAR

SGS TESTING KOREA Co., Ltd. 18-34, Sanbon-dong, Gunpo-si, Gyeonggi-do, Korea, 435-041

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1 General Information

1.1 Notes

The purpose of conformity testing is to increase the probability of adherence to the essential requirements or conformity specifications, as appropriate.
The complexity of the technical specifications, however, means that full and thorough testing is impractical for both technical and economic reasons.
Furthermore, there is no guarantee that a test sample which has passed all the relevant tests conforms to a specification.
The existence of the tests nevertheless provides the confidence that the test sample possesses the qualities as maintained and that is performance generally conforms to representative cases of communications equipment.

The test results of this test report relate exclusively to the item tested as specified in 1.5.
The test report may only be reproduced or published in full.
Reproduction or publication of extracts from the report requires the prior written approval of the SGS Testing Korea.

I attest to the accuracy of data. All measurements reported herein 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 qualification of all persons taking them.

Tester:

February 16, 2005	Elvin Lee	(signature)
Date	Name	Signature

Technical responsibility for area of testing:

March 3, 2005	James Kwon	(signature)
Date	Name	Signature

1.2 Location of Testing laboratory

SGS Testing Korea Co., Ltd.
18-34, Sanbon-dong, Gunpo-si, Gyeonggi-do
Korea
Telephone : +82 31 428 5700
Fax : +82 31 427 2371

1.3 Details of approval holder

Name	REXON TECHNOLOGY CORP
Address	No. 11-3, Chien-Kuo Rd., Tantzu, Taichung, Taiwan
Country	Taiwan
Telephone	+886.4.2531.9850 ext.615
Fax	+886.4.2531.7440
Contact	James Chen
E-Mail	james_chen@srv.rexontec.com.tw

1.4 Manufacturer: (if applicable)

Name	:
Street	:
Town	:
Country	:

1.5 Test item

FCC ID	:I70RL328U
Description of test item	:UHF Transceiver
Type identification	:RL328
Serial number	:without; Identical prototype
Device category	:PCF (Licensed Portable Transmitter Held To Face)

Technical data

Tx Frequency range	:421 – 470 MHz
Rx Frequency range	:421 – 470 MHz
Max. Conducted RF output power	:4.0 W
Power supply	:7.5 V DC rechargeable battery
Antenna Tx	:external
Antenna Rx	:external
Antenna type	:Whip Antenna
Additional information	:Tx and Rx. antenna are the same.

1.6 Test Results

Max. SAR Measurement: 2.255W/kg (averaged over 1 gram)

This EUT has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528-200X(Draft 6.5, January 2002).

1.7 Test standards

Standards : - IEEE Std. 1528-200X (Draft 6.5, January 2002)

FCC Rule Part(s) : - FCC OET Bulletin 65, Supplement C, Edition 01-01

2 Technical test

2.1 Summary of test results

Classification

Uncontrolled environment/general population	
Controlled exposure/occupational environment	X

Applicable Configuration

Handset (Head)	
Handset (Held to face)	X
Handset (Body)	
Headset (Head)	
Body Worn Equipment	X

EUT complies with the RF radiation exposure limits of the FCC as shown by the SAR measurement results. These measurements are taken to simulate the RF effects exposure under worst-case conditions. The EUT complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.
Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interaction, environmental conditions, and physiological variables. [1]

2.2 Test environment

Room temperature	: 22.6–22.7°C
Liquid temperature	: 22.4-22.5°C
Relative humidity content	:48%
Details of power supply	:7.5 V DC

2.3 Test equipment utilized

Type / Model	Calib. Date	S/N
Staubli Robot / RX90BL	N/A	F03/5W05A1/A/01
Staubli Robot Controller / RX90B L	N/A	F03/5W05A1/C/01
Staubli Manual Control Operator	N/A	D22134006 1
PC / IBM NetVista 2.66	N/A	99LA523
OS / Windows 2000	N/A	-
SPEAG DAE / DAE3	April 2004	567
SPEAG E-Field Probe / ET3DV6	April 2004	1782
SPEAG Dummy Probe	N/A	-
SPEAG SAM Phantom	N/A	TP-1300, TP-1299
SPEAG Flat Phantom	N/A	1003, 1005
SPEAG Validation Dipole D450V2	July 2003	1015
SPEAG Validation Dipole D835V2	June 2003	490
SPEAG Validation Dipole D900V2	June 2003	188
SPEAG Validation Dipole D1800V2	June 2003	2d074
SPEAG Validation Dipole D1900V2	June 2003	5d033
SPEAG Validation Dipole D2450V2	July 2003	734
Dipole Antenna/ VHAP/UHAP	May 2004	958
Mounting Device	N/A	-

2.4 Definitions

2.4.1 SAR

The specific absorption rate (SAR) is defined as the time derivative of the incremental energy (*d*W) absorbed by (dissipated in) an incremental mass (*d*m) contained in a volume element (*d*V) of a given density (ρ_t), expressed in watts per kilogram (W/kg)

$$SAR = \frac{d}{dt}\left(\frac{dW}{dm}\right) = \frac{d}{dt}\left(\frac{dW}{p_t dV}\right) = \frac{\sigma}{\rho}|E_t|^2$$

where:

$$\frac{dW}{dt} = \int_v E \cdot J dV = \int_v \sigma E^2 dV$$

2.4.2 Uncontrolled Exposure

The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity. Warning labels placed on low-power consumer devices such as cellular telephones are not considered sufficient to allow the device to be considered under the occupational/controlled category, and the general population/uncontrolled exposure limits apply to these devices. [2]

2.4.3 Controlled Exposure

In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means. Awareness of the potential for RF exposure in a workplace or similar environment can be provided through specific training as part of a RF safety program. If appropriate, warning signs and labels can also be used to establish such awareness by providing prominent information on the risk of potential exposure and instructions on the risk of potential exposure and instructions on methods to minimize such exposure risks. [2]
Push-to-talk applications (PTT) operating in front of a person's face and certain body worn configurations as occupational/controlled exposure. The consideration of a 50% duty factor for PTT simplex radio-caring typical voice traffic is possible.

2.5 Measurement System Description

2.5.1 System Setup

Measurements are performed using the DASY4 automated dosimetric assessment system (figure 1) made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland.

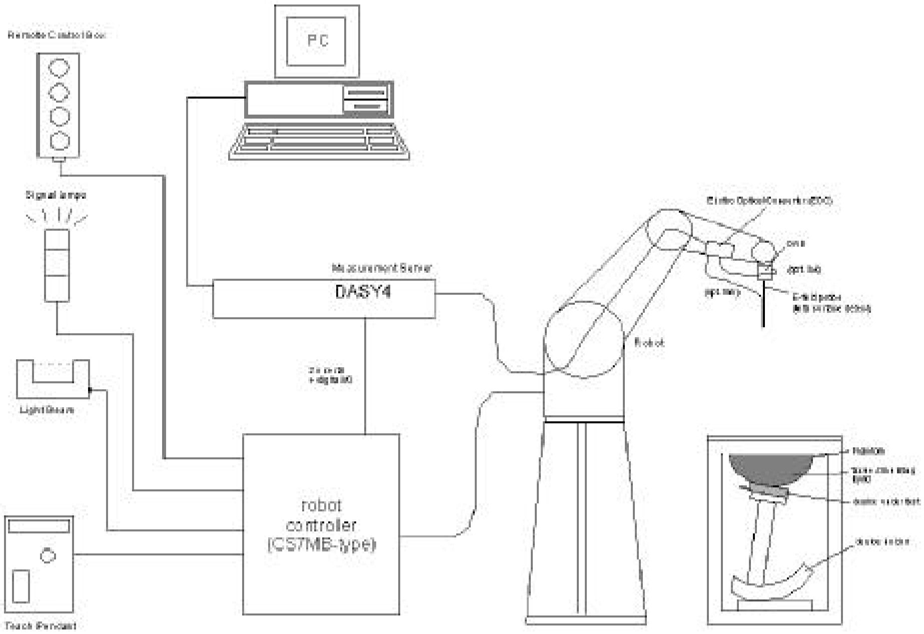


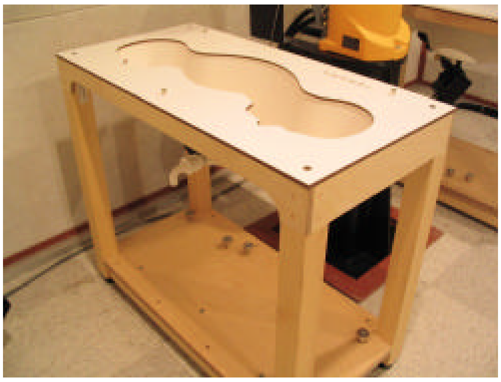
Figure1

The DASY4 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Staubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- An unit to operate the optical surface detector which is connected to the EOC.
- The Electro-optical converter (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the measurement server.
- The functions of the measurement server is to perform the time critical task such as signal filtering, surveillance of the robot operation, fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 2000.
- DASY4 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.

- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes (see Application Notes).
- System validation dipoles allowing to validate the proper functioning of the system.

2.5.2 Phantom Description



(figure 2.1)

The SAM twin phantom V4.0 (figure 2.1) is a fiberglass shell phantom with 2 mm shell thickness. It has three measurement areas:

- Left hand
- Right hand
- Flat phantom

(figure 2.2)

The FLATPHANTOM V4 (figure 2.2) is a phantom for dosimetric evaluations of body mounted usage and system performance check for the frequency up to 3 GHz.

The phantoms are integrated in a wooden table.

The bottom plate of the table 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. Only one device holder is necessary if two phantoms are used(e.g., for different liquids).

A cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on the cover are possible.

On the phantoms top, three reference markers are provided to identify the phantom positions with respect to the robot.

2.5.3 Tissue Simulating Liquids

The parameters of the tissue simulating liquid strongly influence the SAR. The parameters for the different frequencies are defined in the corresponding compliance standards (e.g., EN 50361, IEEE P1528-200X).

Tissue dielectric properties

	Head		Body	
Frequency (MHz)	Relative Dielectric Constant (ε_r)	Conductivity(σ) (S/m)	Relative Dielectric Constant (ε_r)	Conductivity(σ) (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
1450	40.5	1.20	54.0	1.30
1800	40.0	1.40	53.3	1.52
1900	40.0	1.40	53.3	1.52
2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73

2.5.4 Device Holder

The DASY device holder (figure 3.1) is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The rotation center for both scales is the ear opening Thus the device needs no repositioning when changing the angles.

Figure 3.1

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

2.5.5 Probes

The SAR measurements were conducted with the dosimetric probe ET3DV6 (figure 4), designed in the classical triangular configuration and optimized for dosimetric evaluation. [3] The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY4 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.

Figure 4

Probe Specifications

Calibration:	In air from 10 MHz to 2.5 GHz In brain and muscle simulating tissue at Frequencies of 150 MHz, 300 MHz, 450 MHz, 835 MHz, 900 MHz, 1800 MHz, 1900 MHz and 2450 MHz Calibration certificates please find attached.
Frequency:	10 MHz to > 3 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Directivity:	±0.2 dB in HSL (rotation around probe axis) ±0.4 dB in HSL (rotation normal probe axis)
Dynamic Range:	5 µW/g to > 100 mW/g;
Linearity:	± 0.2 dB
Dimensions:	Overall length: 330m Tip length: 16mm Body diameter: 12mm Tip diameter: 6.8mm Distance from probe tip to dipole centers: 2.7 mm
Application:	General dosimetery up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms

2.6 Test System Specification

Positioner	
Robot:	Staubli Animation Corp. Robot Model: RX90B L
Repeatability:	0.02 mm
No. of axis:	6
Data Acquisition Electronic(DAE) System	
Cell Controller	
Processor:	Intel Pentium 4
Clock Speed:	2.66GHz
Operating System:	Windows 2000
Data Card:	DASY4 PC-Board
Data Converter	
Features:	Signal Amplifier, multiplexer, A/D converter, & control logic
Software:	DASY4 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 Probes	
Model:	ET3DV6 / SN1782
Construction:	Triangular core fiber optic detection system
Frequency:	10 MHz to 6 GHz
Linearity:	± 0.2 dB (30 MHz to 3 GHz)
Phantom	
Phantom:	SAM Twin Phantom(V4.0)
Shell Material:	Fiberglass
Thickness:	2.0 ± 0.2 mm
Phantom	
Phantom:	Flat Phantom (V4.4)
Shell Material:	Fiberglass
Thickness:	6 mm ± 0.2 mm

2.7 Measurement Procedure

The evaluation was performed using the following procedure:

1. The SAR measurement was taken at a selected spatial reference point to monitor power variations during testing. This fixed location point was measured and used as a reference value.
2. The SAR distribution at the exposed side of the head was measured at a distance of 3.9mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 10mm x 10mm.
3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 30mm x 30mm x 30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5 x 5 x 5 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:
    a. The data at the surface was extrapolated, since the center of the dipoles is 2.7mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. The extrapolation was based on a least square algorithm [4]. 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.
    b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions) [4] [5]. The volume was integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
    c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as procedure #1, was remeasured. If the value changed by more than 5%, the evaluation is repeated.

2.8 Reference Positions for Handheld Radio Transmitters

In general handheld radio transmitters like PMR/SMR devices are used in held to face position or with a speaker/microphone combination as body-worn configuration.

1.8.1 Held to face position

For held to face position the flat section of a SAM Phantom or a flat phantom is used.
The center of the radiating structure is to set on the middle position of the flat phantom. The distance between sample and flat phantom is 2.5 cm, similar to the real using.
For the measurement head tissue simulating liquid is used.

1.8.2 Belt Clip/Holster Configuration

Test configurations for body-worn operated EUTs are carried out while the belt-clip and/or holster is attached to the EUT and placed against a flat phantom in a regular configuration. An EUT with a headset output it tested with a headset connected to the device.

Body dielectric parameters are used.
There are two categories for accessories for body-worn operation configurations:

1. accessories not containing metallic components
2. accessories containing metallic components.

When the EUT is equipped with accessories not containing metallic components the tests are done with the accessory that dictates the closest spacing to the body. For accessories containing metallic parts a test with each one is implemented. If the multiple accessories share an identical metallic component (e.g. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that has the closest spacing to the body is tested.
In case that a EUT authorized to be body-worn is not supplied or has no options to be operated with any accessories, a test configuration where a separation distance between the back of the device and the flat phantom is used. All test position spacings are documented.
Transmitters operating in front of a person's face (e.g. push-to-talk configurations) are tested for SAR compliance with the front of the device positioned to face the flat platform. SAR Compliance tests for shoulder, waist or chest-worn transmitters are carried out with the accessories including headsets and microphones attached to the device and placed against a flat phantom in a regular configuration.
The SAR measurements are performed to investigate the worst-case positioning. This is documented and used to perform Body SAR testing. [2]. Body tissue simulating liquid is used.

1.9 Measurement uncertainty

The uncertainty budget has been determined for the DASY4 system performance check according to IEEE Str. 1528-200X, (draft), April 2002.

Error Description	Uncertainty value ±%	Probability distribution	Divisor	c_i 1g	Standard unc. (1g)	v_i or v_{eff}
Measurement System						
Probe Calibration	± 4.8	normal	1	1	± 4.8	∞
Axial Isotropy	± 4.7	rectangular	√3	$(1-c_p)^{1/2}$	± 1.9	∞
Hemispherical Isotropy	± 9.6	rectangular	√3	$(c_p)^{1/2}$	± 3.9	∞
Boundary effects	± 1.0	rectangular	√3	1	± 0.6	∞
Linearity	± 4.7	rectangular	√3	1	± 2.7	∞
System Detection limits	± 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	± 2.6	rectangular	√3	1	± 1.5	∞
RF Ambient Conditions	± 3.0	rectangular	√3	1	± 1.7	∞
Probe Positioner Mechanical Tolerance	± 0.4	rectangular	√3	1	± 0.2	∞
Probe Positioning with respect to Phantom Shell	± 2.9	rectangular	√3	1	± 1.7	∞
Extrapolation, Interpolation and Integration Algorithms for Max. SAR Evaluation	± 1.0	rectangular	√3	1	± 0.6	∞
Test Sample Related						
Test Sample Positioning	± 2.9	normal	1	1	± 2.9	145
Device Holder Uncertainty	± 3.6	normal	1	1	± 3.6	5
Output Power Variation – SAR drift measurement	± 5.0	rectangular	√3	1	± 2.9	∞
Phantom and Tissue Parameters						
Phantom Uncertainty (shape and thickness tolerances)	± 4.0	rectangular	√3	1	± 2.3	∞
Liquid conductivity Target - tolerance	± 5.0	rectangular	√3	0.64	± 1.8	∞
Liquid conductivity – measurement uncertainty	± 2.5	normal	1	0.64	± 1.6	∞
Liquid permittivity Target - tolerance	± 5.0	rectangular	√3	0.6	± 1.7	∞
Liquid permittivity – measurement uncertainty	± 2.5	normal	1	0.6	± 1.5	∞
Combined Standard Uncertainty					± 10.3	330
Coverage Factor for 95%		k = 2				
Expanded Standard Uncertainty					± 20.6	

3. Tissue and System Verification

3.1 Tissue Verification

Dielectric parameters of the simulating liquids were verified using a Dielectric Probe Kit Agilent 85070D to a tolerance of ±5%.

Room Temperature: 22.6 - 22.7 ℃

	Measured Tissue Parameters	
	450 MHz Head	
	Target	Measured
Date		February 16, 2005
Liquid Temperature: ℃		22.4
Dielectric Constant: ε	43.5	44.3
Conductivity: σ	0.87	0.859

Room Temperature: 22.6 - 22.7 ℃

	Measured Tissue Parameters	
	450 MHz Body	
	Target	Measured
Date		February 17, 2005
Liquid Temperature: ℃		22.5
Dielectric Constant: ε	56.7	57.42
Conductivity: σ	0.94	1.001

3.2 System Verification

Prior to the assessment, the system was verified by using a 300 MHz validation dipole.
Power level of 250mW was supplied to the dipole antenna placed under the flat section of SAM Phantom.

The system was verified to a tolerance of ±10%

Room Temperature: 22.6-22.7 ℃
Liquid Temperature: 22.4-22.5 ℃
Liquid Depth: >15 cm

System Dipole Validation Target & Measurement					
Date	System Validation Kit:	Liquid	Targeted SAR 1g(mW/g)	Measured SAR 1g(mW/g)	Deviation (%)
Feb16, 2005	D450V2	450 MHz Head	4.9	4.84	-1.22

Comment: Please find attached the measurement plots.

4. Test Results

Procedures Used To Establish Test Signal

The EUT was placed into simulated call mode (e.g. AMPS, Cellular CDMA & PCS CDMA modes) using manufacturers test codes. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [2]. The actual transmission is activated through a base station simulator or similar when test modes are not available or inappropriate for testing the EUT.

The EUT is rechargeable battery operated. The battery used for the SAR measurements was completely charged. The device was tested at full power verified by implementing conducted output power measurements. For confirming of the output power it was tested before and after each SAR measurement. The test was repeated if a conducted power deviation of more than 5% occurred.

Mixture Type: 450 MHz Head
Date: Feb 16, 2005
Liquid Temperature: 22.4-22.5 ℃ Room Temperature: 22.6 – 22.7 ℃

Frequency			Power Drift dBm	Antenna Pos.	Phantom Section	Test Position –25 mm	SAR (W/kg) 1g Measured SAR values	
MHz	Channel	Modulation					100% Duty Cycle	50% Duty Cycle
421	Low	CW	-0.2	Fixed	Flat	Front	3.91	1.955
450	Middle	CW	-0.2	Fixed	Flat	Front	3.59	1.795
470	High	CW	-0.1	Fixed	Flat	Front	3.07	1.535

1. The SAR values found were below the maximum limit of 8.0 w/kg (controlled exposure):
2. The highest face-held SAR value found was 1.955 W/kg (50% duty cycle)
3. The EUT was tested for face-held SAR with a 2.5 cm separation distance between the front of the EUT and the outer surface of the planar phantom.

Mixture Type: 450 MHz Body
Date: Feb 16, 2005
Liquid Temperature: 22.4-22.5 ℃ Room Temperature: 22.6 – 22.7 ℃

Frequency			Power Drift dBm	Antenna Pos.	Phantom Section	Test Position	SAR (W/kg) 1g Measured SAR values	
MHz	Channel	Modulation					100% Duty Cycle	50% Duty Cycle
421	Low	CW	-0.2	Fixed	Flat	Back	4.51	2.255
450	Middle	CW	-0.1	Fixed	Flat	Back	3.07	1.535
470	High	CW	-0.1	Fixed	Flat	Back	3.37	1.685

1. The SAR values found were below the maximum limit of 8.0 w/kg (controlled exposure):
2. The highest body-worn SAR value found was 2.255 W/kg (50% duty cycle)
3. The EUT was tested for body-worn SAR with the attached belt-clip providing separation distance between the front of the EUT and the outer surface of the planar phantom.

Limits:

Exposure Limits	SAR (W/kg)	
	Uncontrolled Exposure/General Population Environment	Controlled Exposure/Occupational Environment
Spatial Average SAR (averaged over the whole body)	0.08	0.40
Spatial Peak SAR (averaged over any 1g of tissue)	1.60	8.00
Spatial Peak SAR (Hands, Feet, Ankles, Wrist) (averaged over any 10g of tissue)	4.00	20.00

Notes:

1. Test data represent the worst case SAR value and test procedure used are according to OET Bulletin 65, Supplement C (01-01).
2. All Modes of operation were investigated.

5. References

[1] ANSI/IEEE C95.3 – 1991, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic fields, 300 KHz to 100 GHz, New York: IEEE, Aug. 1992.

[2] Federal Communications Commission, OET Bulletin 65 (Edition 97-01), Supplement C (Edition 01-01), Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields, July 2001.

[3] T. Schmid, O. Egger, N. Kuster, Automated E-field scanning system for dosimetric assessments, IEEE Transaction on Microwave Theory and Techniques, vol. 44, Jan. 1996, pp. 105-113.

[4] W. Gander, Computer mathematics, Birkhaeuser, Basel, 1992.

[5] W.H. Press, S.A Teukolsky, W.T. Vetterling, and B.P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.

[6] IEEE Standards Coordinating Committee 34 – IEEE Std. 1528-200X (Draft 6.1 – January 2002), Draft Recommended Practice for Determining the Peak Spatial-Average Absorption Rate (SAR in the Human Body Due to Wireless Communications Devices: Experimental Techniques).

[7] DASY4 Dosimetric Assessment System Manual; Draft; September 6, 2002; Schmid & Partner Engineering AG.

6. Appendix

1.	Appendix A	SAR TEST PLOTS	- Head - Body
2.	Appendix B	TEST SETUP & DUT PHOTOGRAPHS	
3.	Appendix C	DIPOLE VALIDATION PLOTS	
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APPENDIX A-SAR TEST PLOTS

Date/Time: 02/16/05 21:46:15

Test Laboratory: SGS Testing Korea

UHF_Head

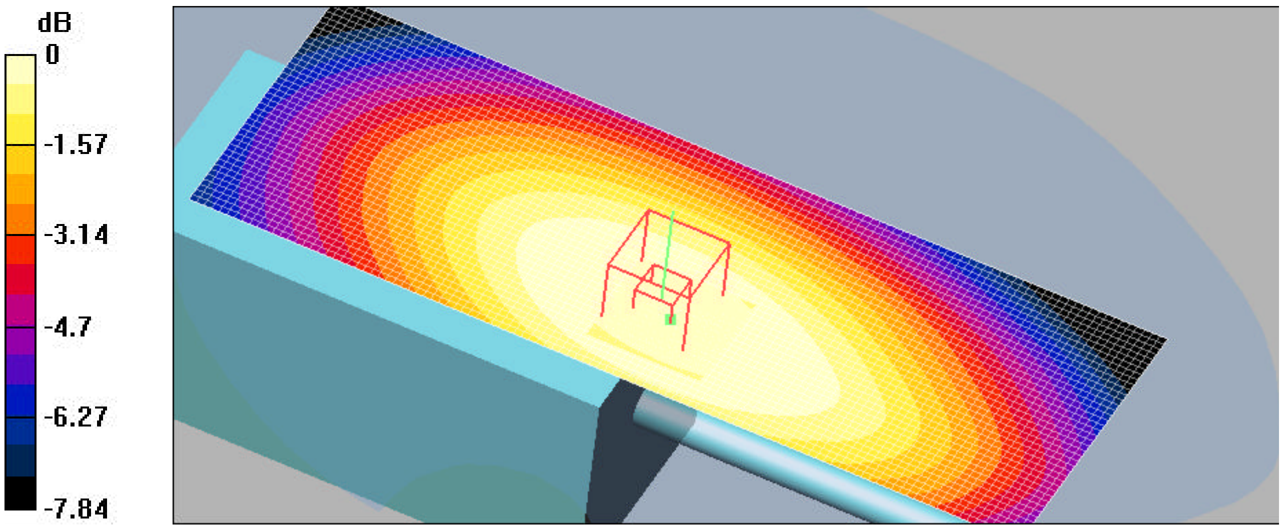
DUT: RL328; Type: UHF; Serial: F04090016

Communication System: CW; Frequency: 421 MHz;Duty Cycle: 1:1
Medium: HSL 450MHz Medium parameters used: f = 421 MHz; s = 0.835 mho/m; e_r = 44.9; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.6, 7.6, 7.6); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

Low/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 4.17 mW/g

Low/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 74.8 V/m; Power Drift = -0.2 dB
Peak SAR (extrapolated) = 5.96 W/kg
SAR(1 g) = 3.91 mW/g; SAR(10 g) = 2.84 mW/g
Maximum value of SAR (measured) = 4.08 mW/g



0 dB = 4.08mW/g

Date/Time: 02/16/05 21:46:15

Test Laboratory: SGS Testing Korea

UHF_Head

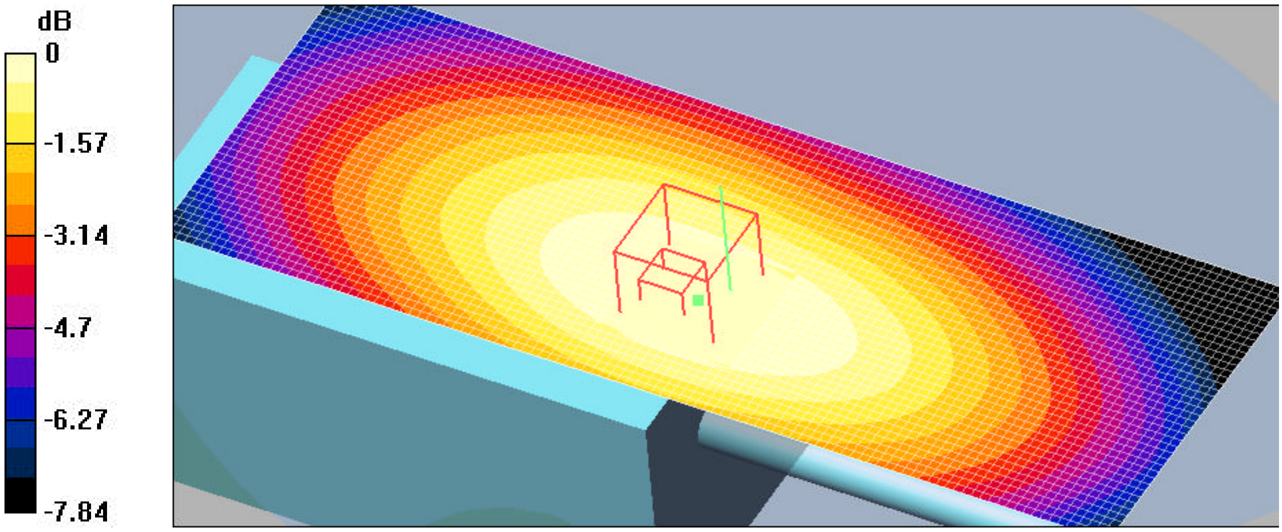
DUT: RL328; Type: UHF; Serial: F04090016

Communication System: CW; Frequency: 450 MHz;Duty Cycle: 1:1
Medium: HSL 450MHz Medium parameters used: f = 450 MHz; s = 0.859 mho/m; e_r = 44.3; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.6, 7.6, 7.6); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

Mid/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 3.84 mW/g

Mid/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 65.8 V/m; Power Drift = -0.2 dB
Peak SAR (extrapolated) = 5.45 W/kg
SAR(1 g) = 3.59 mW/g; SAR(10 g) = 2.61 mW/g
Maximum value of SAR (measured) = 3.74 mW/g



0 dB = 3.74mW/g

Date/Time: 02/16/05 21:46:15

Test Laboratory: SGS Testing Korea

UHF_Head

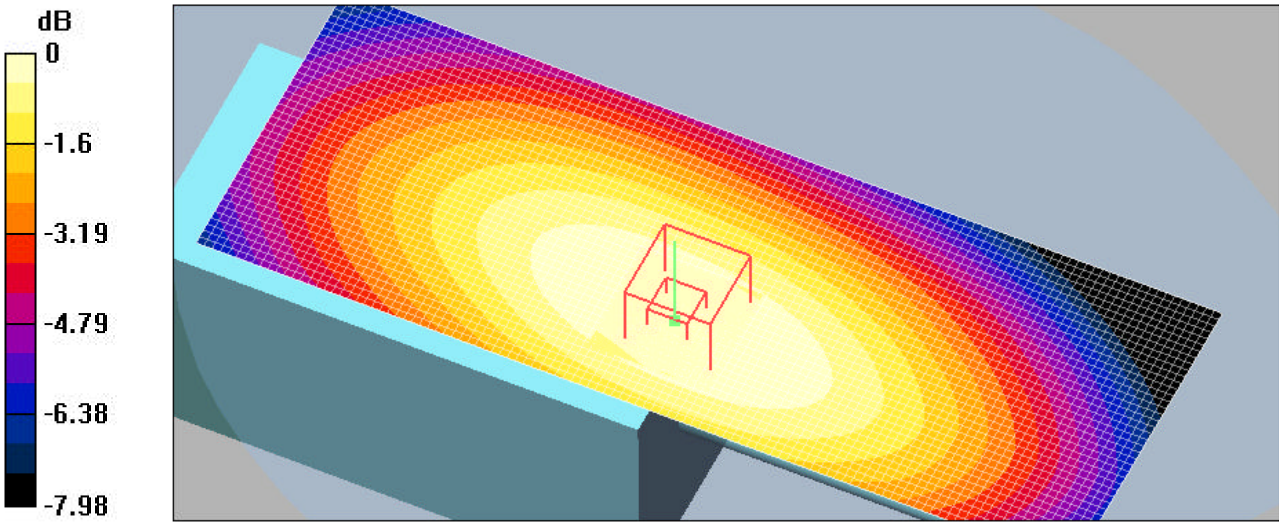
DUT: RL328; Type: UHF; Serial: F04090016

Communication System: CW; Frequency: 470 MHz;Duty Cycle: 1:1
Medium: HSL 450MHz Medium parameters used: f = 470 MHz; s = 0.877 mho/m; e_r = 43.9; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.6, 7.6, 7.6); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

High/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 3.23 mW/g

High/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 59.6 V/m; Power Drift = -0.1 dB
Peak SAR (extrapolated) = 4.79 W/kg
SAR(1 g) = 3.07 mW/g; SAR(10 g) = 2.21 mW/g
Maximum value of SAR (measured) = 3.2 mW/g



0 dB = 3.2mW/g

Date/Time: 02/17/05 09:30:22

Test Laboratory: SGS Testing Korea

UHF_Body

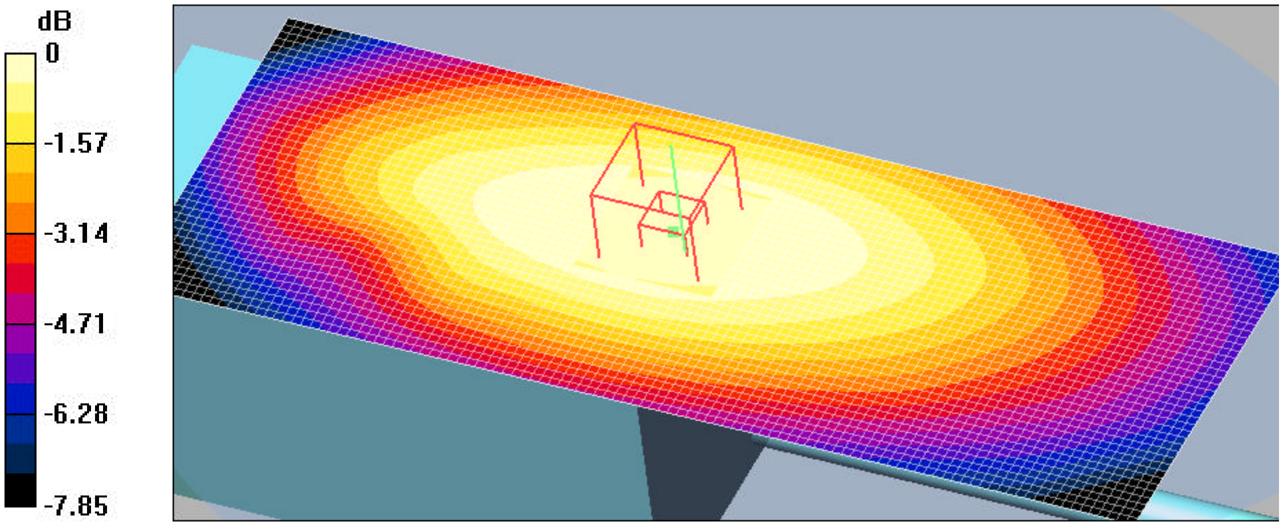
DUT: RL328; Type: UHF; Serial: F04090016

Communication System: CW; Frequency: 421 MHz;Duty Cycle: 1:1
Medium: M450 Medium parameters used: f = 421 MHz; s = 0.977 mho/m; e_r = 57.9; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.4, 7.4, 7.4); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

Low/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 4.75 mW/g

Low/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 72.7 V/m; Power Drift = -0.2 dB
Peak SAR (extrapolated) = 7.13 W/kg
SAR(1 g) = 4.51 mW/g; SAR(10 g) = 3.24 mW/g
Maximum value of SAR (measured) = 4.67 mW/g



0 dB = 4.67mW/g

Date/Time: 02/17/05 09:30:22

Test Laboratory: SGS Testing Korea

UHF_Body

DUT: RL328; Type: UHF; Serial: F04090016

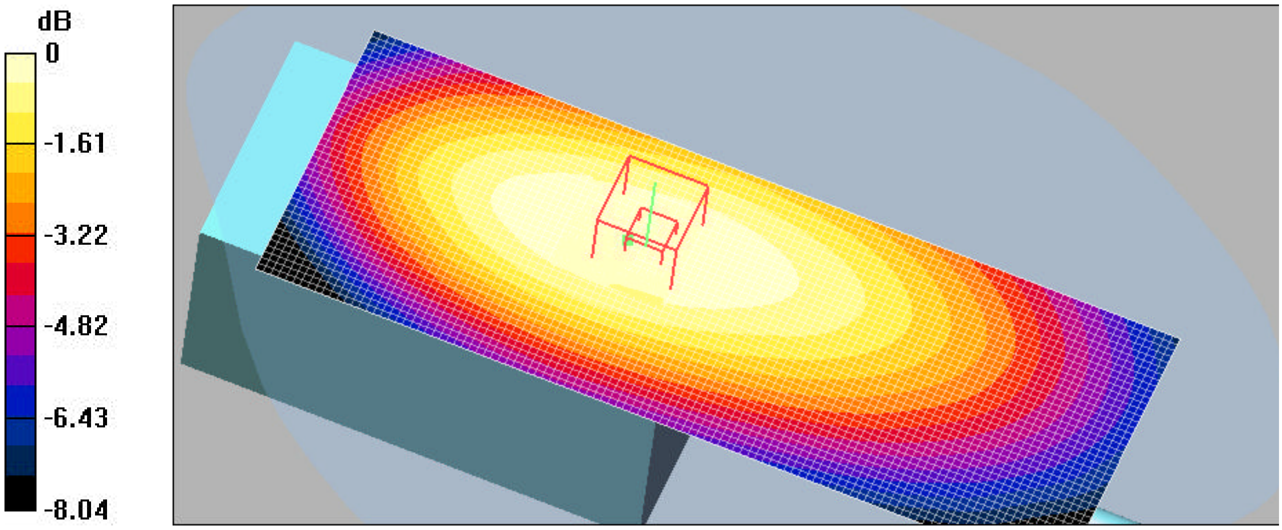
Communication System: CW; Frequency: 450 MHz;Duty Cycle: 1:1
Medium: M450 Medium parameters used: f = 450 MHz; s = 1 mho/m; e_r = 57.4; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.4, 7.4, 7.4); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

Mid 2/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 3.2 mW/g

Mid 2/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 54.8 V/m; Power Drift = -0.1 dB
Peak SAR (extrapolated) = 4.82 W/kg
SAR(1 g) = 3.07 mW/g; SAR(10 g) = 2.2 mW/g

Maximum value of SAR (measured) = 3.18 mW/g



0 dB = 3.18mW/g

Date/Time: 02/17/05 09:30:22

Test Laboratory: SGS Testing Korea

UHF_Body

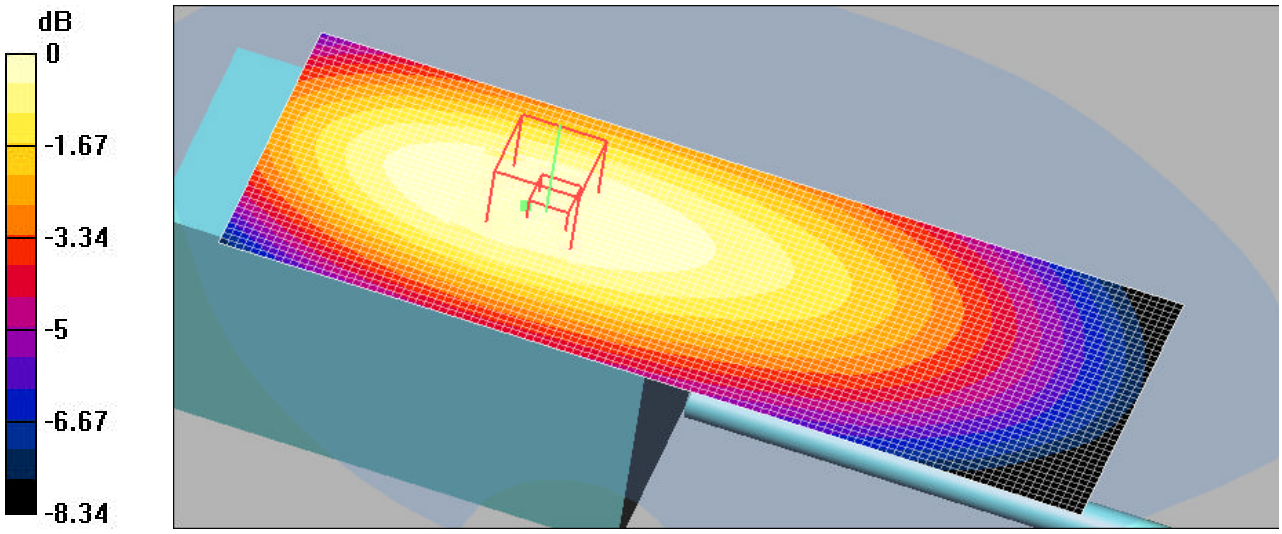
DUT: RL328; Type: UHF; Serial: F04090016

Communication System: CW; Frequency: 470 MHz;Duty Cycle: 1:1
Medium: M450 Medium parameters used: f = 470 MHz; s = 1.02 mho/m; e_r = 57.2; ? = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6 - SN1782; ConvF(7.4, 7.4, 7.4); Calibrated: 2004-04-28
- Sensor-Surface: 4mm (Mechanical And Optical Surface Detection)
- Electronics: DAE3 Sn567; Calibrated: 2004-04-30
- Phantom: SAM MIC #2000-93 with CRP_835MHz; Type: SAM MIC #2000-93; Serial: TP-1300
- Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

High/Area Scan (41x111x1): Measurement grid: dx=20mm, dy=20mm
Maximum value of SAR (interpolated) = 3.53 mW/g

High/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 55.5 V/m; Power Drift = -0.1 dB
Peak SAR (extrapolated) = 5.26 W/kg
SAR(1 g) = 3.37 mW/g; SAR(10 g) = 2.41 mW/g
Maximum value of SAR (measured) = 3.51 mW/g



0 dB = 3.51mW/g

APPENDIX B-TEST SETUP & DUT PHOTOGRAPHS

Dipole Setup for validation Test