



Report No.: FA860629-04

Specific Absorption Rate (SAR) Test Report

for

ZyXEL Communications Corporation

on the

Wireless N USB Adapter

Report Number : FA860629-04

Trade Name : ZyXEL

Model Name : NWD-270N

FCC ID : I88NWD270N

Date of Testing : Dec. 24, 2008

Issued Date of Report : Dec. 29, 2008

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- Report Version: Rev. 01

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No. 52, Hwa Ya 1st Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C.

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Appendix A - System Performance Check Data

Appendix B - SAR Measurement Data

Appendix C - Calibration Data

Appendix D - Product Photos

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1. Statement of Compliance

The Specific Absorption Rate (SAR) maximum result found during testing for the **ZyXEL Communications Corporation Wireless N USB Adapter ZyXEL NWD-270N is 1 W/kg on the 802.11b/g/n body SAR** with expanded uncertainty 21.9%. It is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1999 and had been tested in accordance with the measurement methods and procedures specified in OET Bulletin 65 Supplement C (Edition 01-01).

Approved by

Roy Wu Manager

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2. Administration Data

2.1 Testing Laboratory

Company Name : Sporton International Inc.

Address: No. 52, Hwa-Ya 1st RD., Hwa Ya Technology Park, Kwei-Shan Hsiang,

TaoYuan Hsien, Taiwan, R.O.C.

Test Site: SAR01-HY

Telephone Number: 886-3-327-3456 **Fax Number:** 886-3-328-4978

2.2 Applicant

Company Name : ZyXEL Communications Corporation

Address: No. 6, Innovation Road II, Science Park, Hsin-Chu, Taiwan

2.3 Manufacturer

Company Name : ZyXEL Communications Corporation

Address: No. 6, Innovation Road II, Science Park, Hsin-Chu, Taiwan

2.4 Application Details

Date of reception of application: Nov. 28, 2008
Start of test: Dec. 24, 2008
End of test: Dec. 24, 2008

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3. General Information

3.1 <u>Description of Device Under Test (DUT)</u>

Product Feature & Specification					
DUT Type	Wireless N USB Adapter				
Trade Name	ZyXEL				
Model Name	NWD-270N				
FCC ID	I88NWD270N				
Tx/Rx Frequency Range	2400 MHz ~ 2483.5 MHz				
	802.11b : 16.51 dBm				
Maximum Quitnut Bower to Antonno	802.11g : 15.65 dBm				
Maximum Output Power to Antenna	802.11n (BW 20MHz) : 18.78 dBm				
	802.11n (BW 40MHz) : 17.23 dBm				
Antenna Type	Chip Antenna				
Type of Madulation	802.11b : DSSS				
Type of Modulation	802.11g/n : OFDM				
DUT Stage	Production Unit				

3.2 Product Photos

Refer to Appendix D.

3.3 Applied Standards

The Specific Absorption Rate (SAR) testing specification, method and procedure for this Wireless N USB Adapter is in accordance with the following standards:

47 CFR Part 2 (2.1093)

IEEE C95.1-1999

OET Bulletin 65 Supplement C (Edition 01-01)

KDB 248227 r1.2

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3.4 Device Category and SAR Limits

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user. Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

3.5 Test Conditions

3.5.1 Ambient Condition

Ambient Temperature	20-24
Humidity	<60 %

3.5.2 Test Configuration

For WLAN link mode, engineering testing software installed on the EUT can provide continuous transmitting RF signal. This RF signal utilized in SAR measurement has almost 100% duty cycle and its crest factor is 1. Measurements were performed on the lowest, middle, and highest channel for each testing position. However, measurements were performed only on the middle channel if the SAR is below 3 dB of limit for body SAR testing.

The data rates for WLAN SAR testing were set in 1Mbps for 802.11b, 6Mbps for 802.11g, and 13Mbps for 802.11n due to the highest RF output power.

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4. Specific Absorption Rate (SAR)

4.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

4.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density.

ρ). The equation description is as below:

$$SAR = \frac{d}{dt} \left(\frac{dW}{dm} \right) = \frac{d}{dt} \left(\frac{dW}{\rho dv} \right)$$

SAR is expressed in units of Watts per kilogram (W/kg)

SAR measurement can be either related to the temperature elevation in tissue by

$$SAR = C \frac{\delta T}{\delta t}$$

, where C is the specific head capacity, $\,\delta\, {\rm T}$ is the temperature rise and $\,\delta\, {\rm t}$ the exposure duration, or related to the electrical field in the tissue by

$$SAR = \frac{\sigma |E|^2}{\rho}$$

, where σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the rms electrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

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5. SAR Measurement Setup

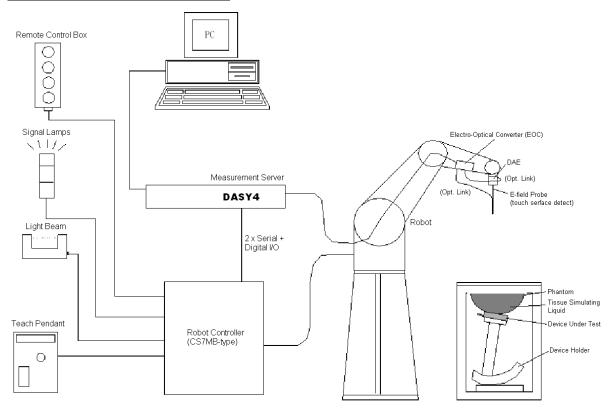


Fig. 5.1 DASY4 System

The DASY4 system for performance compliance tests is illustrated above graphically. This system consists of the following items:

- > A standard high precision 6-axis robot with controller, a teach pendant and software
- A data acquisition electronic (DAE) attached to the robot arm extension
- A dosimetric probe equipped with an optical surface detector system
- > The electro-optical converter (ECO) performs the conversion between optical and electrical signals
- A measurement server performs the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning
- A computer operating Windows XP
- DASY4 software
- Remove control with teach pendant and additional circuitry for robot safety such as warming lamps, etc.
- The SAM twin phantom
- A device holder
- Tissue simulating liquid
- Dipole for evaluating the proper functioning of the system

Some of the components are described in details in the following sub-sections.

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5.1 DASY4 E-Field Probe System

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

5.1.1 ET3DV6 E-Field Probe Specification <ET3DV6>

<=13D40>								
Construction	Symmetrical design with triangular co	ore						
	Built-in optical fiber for surface detection system							
	Built-in shielding against static charge	Built-in shielding against static charges						
	PEEK enclosure material (resistant to	organic solvents)						
Frequency	10 MHz to 3 GHz							
Directivity	± 0.2 dB in brain tissue (rotation							
	around probe axis)							
	± 0.4 dB in brain tissue (rotation							
	perpendicular to probe axis)							
Dynamic Range	5μW/g to 100mW/g; Linearity:							
	±0.2dB							
Surface Detection	± 0.2 mm repeatability in air and							
	clear liquids on reflecting surface							
Dimensions	Overall length: 330mm							
	Tip length: 16mm							
	Body diameter: 12mm							
	Tip diameter: 6.8mm							
	Distance from probe tip to dipole							
	centers: 2.7mm	Fig. 5.2 Probe Setup on Robot						
Application	General dosimetry up to 3GHz	•						
	Compliance tests for mobile phones a	and Wireless LAN						
	Fast automatic scanning in arbitrary p	phantoms						

5.1.2 ET3DV6 E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than \pm 10%. The spherical isotropy shall be evaluated and within \pm 0.25dB. The sensitivity parameters (NormX, NormY, and NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data are as below:

> ET3DV6 sn1787 (Cal: Aug. 26, 2008)

Sensitivity	X axis : 1.63 μV Y X axis : 90 mV		Y axis : 1.67 μV		Z axis : 2.18 μV
Diode compression point			Y ax	tis : 93 mV	Z axis: 92 mV
Conversion factor (Body)	Frequency (MHz)	Ха	xis	Y axis	Z axis
(войу)	2350~2550	3.7	79	3.79	3.79
Boundary effect (Body)	Frequency (MHz)	Alp	ha	Depth	
(Body)	2350~2550	0.9	90	1.51	

NOTE: The probe parameters have been calibrated by the SPEAG.

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5.2 DATA Acquisition Electronics (DAE)

The data acquisition electronics (DAE3) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.

The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of the DAE3 is 200M Ohm; the inputs are symmetrical and floating. Common mode rejection is above 80dB.

5.3 Robot

The DASY4 system uses the high precision robots TX90 XL type out of the newer series from Stäubli SA (France). For the 6-axis controller DASY4 system, the CS8C robot controller version from Stäubli is used. The XL robot series have many features that are important for our application:

- > High precision (repeatability 0.02 mm)
- High reliability (industrial design)
- > Jerk-free straight movements
- > Low ELF interference (the closed metallic construction shields against motor control fields)
- ➢ 6-axis controller

5.4 Measurement Server

The DASY4 measurement server is based on a PC/104 CPU board with

166 MHz CPU

32 MB chipset and

64 MB RAM.

Communication with

the DAE3 electronic box

the 16-bit AD-converter system for optical detection and digital I/O interface.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.

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5.5 SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region where shell thickness increases to 6mm). It has three measurement areas:

- Left head
- Right head
- Flat phantom

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

The phantom can be used with the following tissue simulating liquids:

- *Water-sugar based liquid
- *Glycol based liquids

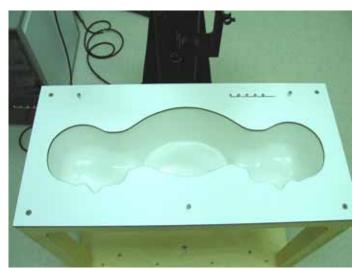


Fig. 5.3 Top View of Twin Phantom



Fig. 5.4 Bottom View of Twin Phantom

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5.6 <u>Device Holder for SAM Twin Phantom</u>

The SAR in the Phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source in 5 mm distance, a positioning uncertainty of ±0.5mm would produce a SAR uncertainty of ± 20%. An accurate device position is therefore crucial for accurate and repeatable measurement. The position in which the devices must be measured, are defined by the standards.

The DASY4 device holder 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 reference points). The rotation center for both scales is the ear reference point (EPR).

Thus the device needs no repositioning when changing the angles.

The DASY4 device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ 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 test results could thus be lowered.



Fig. 5.1 Device Holder

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5.7 Data Storage and Evaluation

5.7.1 Data Storage

The DASY4 software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension .DA4. The post-processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of erroneous parameter settings. For example, if a measurement has been performed with an incorrect crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type (e.g., [V/m], [A/m], [mW/g]). Some of these units are not available in certain situations or give meaningless results, e.g., a SAR-output in a non-lose media, will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

5.7.2 Data Evaluation

The DASY4 post-processing software (SEMCAD) automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters :	- Sensitivity	Norm _i , a_{0} , a_{1} , a_{2}
--------------------	---------------	---

Conversion factor ConvF_i
 Diode compression point dcp_i

Device parameters: - Frequency f

- Crest factor cf

Media parameters : - Conductivity σ

- Density ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY4 components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

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The formula for each channel can be given as:

$$Vi = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with

 V_i = compensated signal of channel i (i = x, y, z)

 U_i = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field (DASY parameter) dcp_i = diode compression point (DASY parameter)

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

E-field probes : $E_i = \sqrt{\frac{V_i}{Norm_iConvF}}$

 $\mbox{H-field probes}: \quad \mbox{H_i} \ = \ \sqrt{V_i} \, \frac{a_{i0+} a_{i1} f + a_{i2} f^2}{f}$

with

 V_i = compensated signal of channel i (i = x, y, z)

Norm_i = sensor sensitivity of channel i (i = x, y, z)

μV/(V/m)2 for E-field Probes

ConvF = sensitivity enhancement in solution

a_{ii} = sensor sensitivity factors for H-field probes

 \vec{f} = carrier frequency [GHz]

 E_i = electric field strength of channel *i* in V/m

 H_i = magnetic field strength of channel *i* in A/m

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

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with

SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

 σ = conductivity in [mho/m] or [Siemens/m]

 ρ = equivalent tissue density in g/cm³

* Note that the density is set to 1, to account for actual head tissue density rather than the density of the tissue simulating liquid.

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

$$P_{pwe} = \frac{E_{tot}^2}{3770}$$
 or $P_{pwe} = H_{tot}^2 \cdot 37.7$

with

Ppwe = equivalent power density of a plane wave in mW/cm²

Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m

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5.8 Test Equipment List

Manufacturer	Name of Equipment	Type/Medal	Carial Number	Calibration		
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date	
SPEAG	Dosimetric E-Filed Probe	ET3DV6	1787	Aug. 26, 2008	Aug. 25, 2009	
SPEAG	2450MHz System Validation Kit	D2450V2	736	Jul. 12, 2007	Jul. 11, 2009	
SPEAG	Data Acquisition Electronics	DAE3	577	Nov. 12, 2008	Nov. 11, 2009	
SPEAG	Device Holder	N/A	N/A	NCR	NCR	
SPEAG	SAM Phantom	QD 000 P40 C	TP-1303	NCR	NCR	
SPEAG	SAM Phantom	QD 000 P40 C	TP-1446	NCR	NCR	
SPEAG	SAM Phantom	QD 000 P40 C	TP-1383	NCR	NCR	
SPEAG	ELI4 Phantom	QD 0VA 001 BA	1029	NCR	NCR	
Agilent	PNA Series Network Analyzer	E8358A	US40260131	Apr. 02, 2008	Apr. 01, 2009	
Agilent	Dielectric Probe Kit	85070D	US01440205	NCR	NCR	
Agilent	Dual Directional Coupler	778D	50422	NCR	NCR	
AR	Power Amplifier	5S1G4M2	0328767	NCR	NCR	
R&S	Power Meter	NRVD	101394	Oct. 20, 2008	Oct. 19, 2009	
R&S	Power Sensor	NRV-Z1	100130	Oct. 20, 2008	Oct. 19, 2009	
Agilent	PNA Series Network Analyzer	E8358A	US40260131	Apr. 02, 2008	Apr. 01, 2009	

Table 5.1 Test Equipment List

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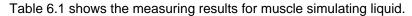
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6. <u>Tissue Simulating Liquids</u>

For the measurement of the field distribution inside the SAM phantom with DASY4, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. The liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is (head SAR) or from the flat phantom to the liquid top surface (body SAR) is 15.2cm, which is shown in Fig. 6.1.



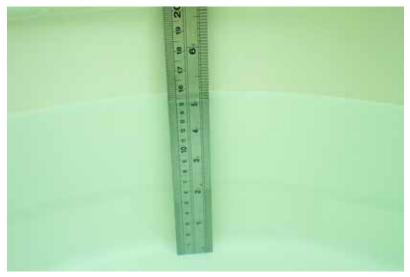


Fig 6.1 Liquid height from the bottom of the phantom body is 15.2 centimeters

The following ingredients for tissue simulating liquid are used:

- \triangleright Water: deionized water (pure H20), resistivity 16MΩ- as basis for the liquid
- > Sugar: refined sugar in crystals, as available in food shops to reduce relative permittivity
- Salt: pure NaCl to increase conductivity
- ➤ Cellulose: Hydroxyethyl-cellulose, medium viscosity (75-125 mPa.s, 2% in water, 20°C), CAS#54290-to increase viscosity and to keep sugar in solution.
- ➤ Preservative: Preventol D-7 Bayer AG, D-51368 Leverkusen, CAS#55965-84-9- to prevent the spread of bacteria and molds.
- ➤ DGMBE: Deithlenglycol-monobuthyl ether (DGMBE), Fluka Chemie GmbH, CAS#112-34-5 to reduce relative permittivity.

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an Agilent 85070D Dielectric Probe Kit and an Agilent Network Analyzer.

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Table 6.1 gives the recipes for one liter of tissue simulating liquid for frequency band 2450 MHz.

Ingredient	MSL-2450
Water	698.3 ml
DGMBE	301.7 ml
Total amount	1 liter (1.0 kg)
Dielectric Parameters at 22°	f = 2450MHz
	$\varepsilon_{\rm f}$ = 52.7±5%, σ = 1.95±5% S/m

Table 6.1 Recipes of tissue Simulating Liquid

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an Agilent 85070D Dielectric Probe Kit and an Agilent Network Analyzer.

Table 6.2 shows the measuring results for muscle simulating liquid.

Band	Temperature ()	Frequency (MHz)	Permittivity (ε _r)	Conductivity (σ)	Measurement date
		2412	1.95	51.1	
802.11b/g/n	21.9	2437	1.97	51	Dec. 24, 2008
		2462	2	50.9	

Table 6.2 Measuring Results for Muscle Simulating Liquid

The measuring data are consistent with $\varepsilon r = 52.7 \pm 5\%$ and $\sigma = 1.95 \pm 5\%$.

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7. <u>Uncertainty Assessment</u>

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type An evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in Table 7.1

Uncertainty Distributions	Normal	Rectangular	Triangular	U-shape
Multiplying factor ^(a)	1/k ^(b)	1/√3	1/√6	1/√2

⁽a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity

Table 7.1 Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY4 uncertainty Budget is showed in Table 7.2.

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⁽b) κ is the coverage factor

Error Description	Uncertainty Value ± %	Probability Distribution	Divisor	Ci (1g)	Standard Unc. (1g)	vi or Veff
Measurement Equipment					•	
Probe Calibration	±5.9 %	Normal	1	1	±5.9 %	8
Axial Isotropy	±4.7 %	Rectangular	√3	0.7	±1.9 %	8
Hemispherical Isotropy	±9.6 %	Rectangular	√3	0.7	±3.9 %	8
Boundary Effects	±1.0 %	Rectangular	√3	1	±0.6 %	8
Linearity	±4.7 %	Rectangular	√3	1	±2.7 %	8
System Detection Limits	±1.0 %	Rectangular	√3	1	±0.6 %	8
Readout Electronics	±0.3 %	Normal	1	1	±0.3 %	8
Response Time	±0.8 %	Rectangular	√3	1	±0.5 %	8
Integration Time	±2.6 %	Rectangular	√3	1	±1.5 %	8
RF Ambient Noise	±3.0 %	Rectangular	√3	1	±1.7 %	8
RF Ambient Reflections	±3.0 %	Rectangular	√3	1	±1.7 %	8
Probe Positioner	±0.4 %	Rectangular	√3	1	±0.2 %	8
Probe Positioning	±2.9 %	Rectangular	√3	1	±1.7 %	8
Max. SAR Eval.	±1.0 %	Rectangular	√3	1	±0.6 %	8
Test Sample Related						
Device Positioning	±2.9 %	Normal	1	1	±2.9	145

±3.6 %

±5.0 %

±4.0 %

±5.0 %

±2.5 %

±5.0 %

±2.5 %

Table 7.2 Uncertainty Budget of DASY4

Normal

Rectangular

Rectangular

Rectangular

Normal

Rectangular

Normal

K=2

√3

√3

√3

1

√3

1

1

1

0.64

0.64

0.6

0.6

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Device Holder

Phantom and Setup Phantom Uncertainty

Liquid Conductivity (target)

Liquid Conductivity (meas.)

Liquid Permittivity (target)

Liquid Permittivity (meas.)

Coverage Factor for 95 %
Expanded uncertainty

(Coverage factor = 2)

Combined Standard Uncertainty

Power Drift

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±3.6

±2.9

±2.3

±1.8

±1.6

±1.7

±1.5

±10.9

±21.9

5

∞

8

∞

387



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8. SAR Measurement Evaluation

Each DASY4 system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY4 software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder.

8.1 Purpose of System Performance Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

8.2 System Setup

In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 2450 MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

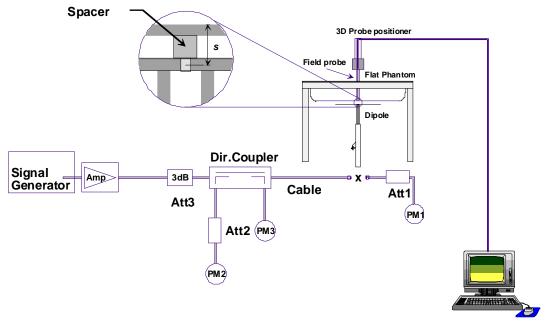


Fig. 8.1 System Setup for System Evaluation

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- 1. Signal Generator
- 2. Amplifier
- 3. Directional Coupler
- 4. Power Meter
- 5. 2450MHz Dipole

The output power on dipole port must be calibrated to 20dBm (100mW) before dipole is connected.



Fig 8.2 Dipole Setup

8.3 Validation Results

Comparing to the original SAR value provided by SPEAG, the validation data should be within its specification of 10 %. Table 8.1 shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion.

Frequency	SAR	Target (W/kg)	Measurement data (W/kg)	Variation	Measurement Date
2450MHz	SAR (1g)	52.5	56.1	6.9 %	Dec. 24, 2008
2450IVIII2	SAR (10g)	24.4	25.9	6.1 %	Dec. 24, 2006

Table 8.1 Target and Measurement Data Comparison

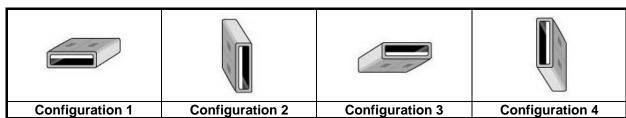
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9. <u>Description for DUT Testing Position</u>

This DUT was tested in four different USB configurations. They are "direct laptop plug-in for configuration 1 and 4" and "USB cable plug-in for configuration 2 and 3" shown as below. Both direct laptop plug-in and cable plug-in test configurations are tested with 5 mm separation between the particular dongle orientation and the flat phantom. The USB cable does not affect device radiating characteristics and output power of the dongle. Please refer to Appendix E for the test setup photos.



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10. Measurement Procedures

The measurement procedures are as follows:

- Using engineering software to transmit RF power continuously (continuous Tx)
- Placing the DUT in the positions described in the last section
- > Setting scan area, grid size and other setting on the DASY4 software
- Taking data for the middle channel
- Repeat the previous steps for the lowest and highest channels.

According to the OET Bulletin 65 Supplement C standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- Power reference measurement
- Area scan
- Zoom scan
- Power reference measurement

10.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the OET Bulletin 65 Supplement C standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY4 software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- extraction of the measured data (grid and values) from the Zoom Scan
- calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- generation of a high-resolution mesh within the measured volume
- interpolation of all measured values form the measurement grid to the high-resolution grid
- extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- calculation of the averaged SAR within masses of 1g and 10g

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10.2 Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures 5x5x7 points with step size 8, 8 and 5 mm. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 1 g.

10.3SAR Averaged Methods

In DASY4, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

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11. SAR Test Results

11.1 Conducted Power

Band Data Rate	802.11b	802.11g	802.11n (BW 20M)	
Channel	1 Mbps	6 Mbps	13 Mbps	
1	15.29	13.66	17.99	
6	16.12	13.20	18.78	
11	16.51	15.65	17.37	

Band	802.11n (BW 40M)		
Channel Data Rate	13 Mbps		
3	15.44		
6	17.23		
9	15.50		

Unit: dBm

11.2 SAR Test Record

USB Configuration	Mode	Chan.	Frequency (MHz)	Modulation Type	Measured 1g SAR (W/kg)	Limit (W/kg)	Result
1	802.11b	6 (Mid)	2437	DSSS	0.129	1.6	Pass
2	802.11b	6 (Mid)	2437	DSSS	0.162	1.6	Pass
3	802.11b	6 (Mid)	2437	DSSS	0.733	1.6	Pass
4	802.11b	6 (Mid)	2437	DSSS	0.157	1.6	Pass
3	802.11g	6 (Mid)	2437	OFDM	0.262	1.6	Pass
3	802.11n (20M)	6 (Mid)	2437	OFDM	1	1.6	Pass
3	802.11n (40M)	6 (Mid)	2437	OFDM	0.712	1.6	Pass
3	802.11n (20M)	1 (Low)	2412	OFDM	0.440	1.6	Pass
3	802.11n (20M)	11(High)	2462	OFDM	0.514	1.6	Pass

Test Engineer: Eric Huang

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12. Reference

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [2] IEEE Std. P1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", April 21, 2003
- [3] Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01), "Additional Information for Evaluating Compliance of Mobile and Portable Devices with FCC Limits for Human Exposure to RF Emissions", June 2001
- [4] 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", 1999
- [5] Robert J. Renka, "Multivariate Interpolation Of Large Sets Of Scattered Data", University of North Texas ACM Transactions on Mathematical Software, vol. 14, no. 2, June 1988, pp. 139-148
- [6] DASY4 System Handbook
- [7] KDB 248227 r1.2 SAR Measurement Procedures for 802.11abg Transmitters

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Appendix A - System Performance Check Data

Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab Date: 2008/12/24

Report No.: FA860629-04

System Check_Body_2450MHz_081224

DUT: Dipole 2450 MHz

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2450 MHz; $\sigma = 1.99$ mho/m; $\epsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.9 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 - SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26

- Sensor-Surface: 4mm (Mechanical Surface Detection)

- Electronics: DAE3 Sn577; Calibrated: 2008/11/12
- Phantom: ELI 4.0_Front; Type: QDOVA001BB; Serial: 1026
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

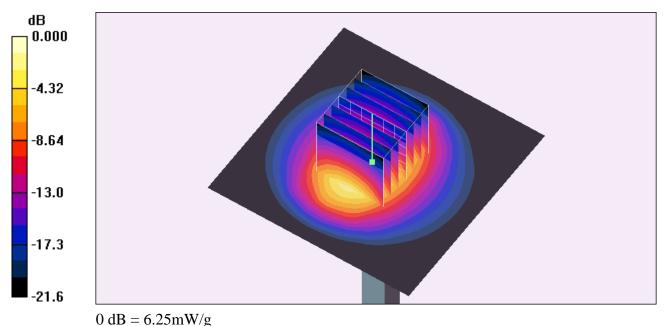
Pin=100mW/Area Scan (91x91x1): Measurement grid: dx=10mm, dy=10mm Maximum value of SAR (interpolated) = 6.42 mW/g

Pin=100mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 57.6 V/m; Power Drift = 0.009 dB

Peak SAR (extrapolated) = 12.9 W/kg

SAR(1 g) = 5.61 mW/g; SAR(10 g) = 2.59 mW/g Maximum value of SAR (measured) = 6.25 mW/g



0 dB = 0.23 m W/g

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Appendix B - SAR Measurement Data

Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab Date: 2008/12/24

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Body_802.11b Ch6_Horizontal Up with 0.5cm Gap

DUT: 860629-04

Communication System: 802.11b; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2437 MHz; $\sigma = 1.97$ mho/m; $\epsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.8 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 - SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26

- Sensor-Surface: 4mm (Mechanical Surface Detection)

- Electronics: DAE3 Sn577; Calibrated: 2008/11/12
- Phantom: ELI 4.0_Front; Type: QDOVA001BB; Serial: 1026
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

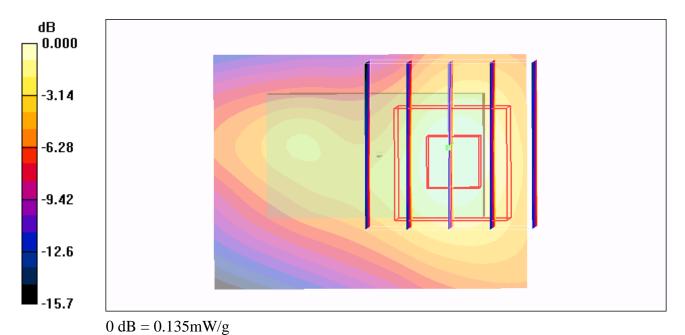
Ch6/Area Scan (31x41x1): Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (interpolated) = 0.137 mW/g

Ch6/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 5.74 V/m; Power Drift = -0.073 dB

Peak SAR (extrapolated) = 0.292 W/kg

SAR(1 g) = 0.129 mW/g; SAR(10 g) = 0.064 mW/g Maximum value of SAR (measured) = 0.135 mW/g



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Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab Date: 2008/12/24

Report No.: FA860629-04

Body_802.11b Ch6_Vertical Front with 0.5cm Gap

DUT: 860629-04

Communication System: 802.11b; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2437 MHz; $\sigma = 1.97$ mho/m; $\epsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.9 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn577; Calibrated: 2008/11/12
- Phantom: ELI 4.0_Front; Type: QDOVA001BB; Serial: 1026
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

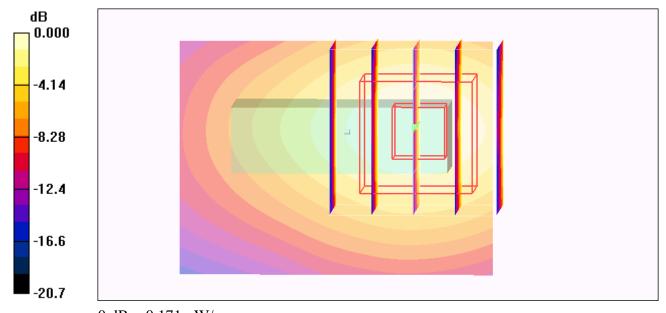
Ch6/Area Scan (31x41x1): Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (interpolated) = 0.180 mW/g

Ch6/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 8.00 V/m; Power Drift = -0.135 dB

Peak SAR (extrapolated) = 0.363 W/kg

SAR(1 g) = 0.162 mW/g; SAR(10 g) = 0.082 mW/g Maximum value of SAR (measured) = 0.171 mW/g



0 dB = 0.171 mW/g

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Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab

Date: 2008/12/24

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Body_802.11n(20M) Ch6_Horizontal Down with 0.5cm Gap

DUT: 860629-04

Communication System: 802.11n; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2437 MHz; $\sigma = 1.97$ mho/m; $\epsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.8 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn577; Calibrated: 2008/11/12
- Phantom: ELI 4.0_Front; Type: QDOVA001BB; Serial: 1026
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

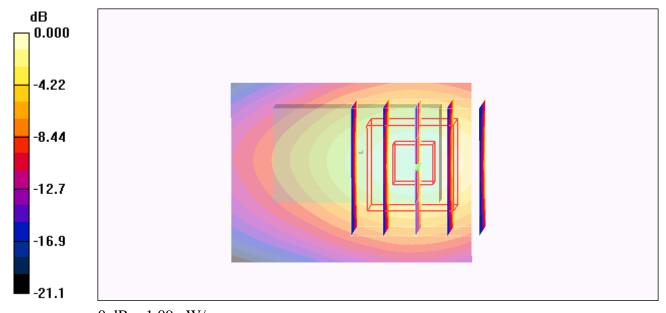
Ch6/Area Scan (31x41x1): Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (interpolated) = 1.15 mW/g

Ch6/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 18.8 V/m; Power Drift = -0.134 dB

Peak SAR (extrapolated) = 2.23 W/kg

SAR(1 g) = 1.000 mW/g; SAR(10 g) = 0.486 mW/gMaximum value of SAR (measured) = 1.09 mW/g



0 dB = 1.09 mW/g

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Test Laboratory: Sporton International Inc. SAR/HAC Testing Lab Date: 2008/12/24

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Body_802.11b Ch6_Vertical Back with 0.5cm Gap

DUT: 860629-04

Communication System: 802.11b; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2437 MHz; $\sigma = 1.97$ mho/m; $\varepsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.9 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 - SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26

- Sensor-Surface: 4mm (Mechanical Surface Detection)

- Electronics: DAE3 Sn577; Calibrated: 2008/11/12

- Phantom: ELI 4.0; Type: QDOVA001BA; Serial: 1029

- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

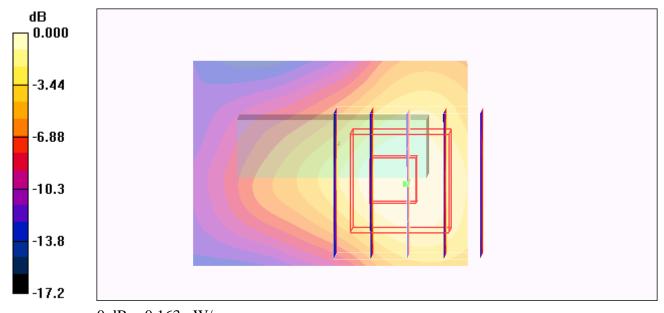
Ch6/Area Scan (31x41x1): Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (interpolated) = 0.184 mW/g

Ch6/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 6.46 V/m; Power Drift = -0.112 dB

Peak SAR (extrapolated) = 0.392 W/kg

SAR(1 g) = 0.157 mW/g; SAR(10 g) = 0.077 mW/gMaximum value of SAR (measured) = 0.163 mW/g



0 dB = 0.163 mW/g

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FCC SAR Test Report

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Body_802.11n(20M) Ch6_Horizontal Down with 0.5cm Gap_2D

DUT: 860629-04

Communication System: 802.11n; Frequency: 2437 MHz; Duty Cycle: 1:1

Medium: MSL_2450 Medium parameters used: f = 2437 MHz; $\sigma = 1.97$ mho/m; $\epsilon_r = 51$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.8 °C; Liquid Temperature: 21.9 °C

DASY4 Configuration:

- Probe: ET3DV6 - SN1787; ConvF(3.79, 3.79, 3.79); Calibrated: 2008/8/26

- Sensor-Surface: 4mm (Mechanical Surface Detection)

- Electronics: DAE3 Sn577; Calibrated: 2008/11/12

- Phantom: ELI 4.0_Front; Type: QDOVA001BB; Serial: 1026

- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

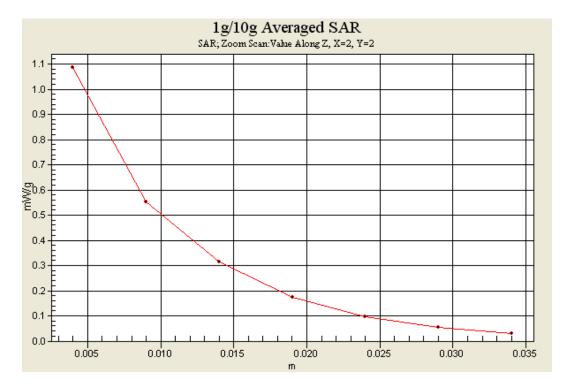
Ch6/Area Scan (31x41x1): Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (interpolated) = 1.15 mW/g

Ch6/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 18.8 V/m; Power Drift = -0.134 dB

Peak SAR (extrapolated) = 2.23 W/kg

SAR(1 g) = 1.000 mW/g; SAR(10 g) = 0.486 mW/g Maximum value of SAR (measured) = 1.09 mW/g



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Appendix C – Calibration Data

Please refer to the calibration certificates of DASY as below.

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Calibration Laboratory of Schmid & Partner Engineering AG Zeughausstrasse 43, 8004 Zurich, Switzerland





Schweizerischer Kalibrierdienst Service suisse d'étalonnage C Servizio svizzero di taratura S Swiss Calibration Service

Accreditation No.: SCS 108

Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Certificate No: ET3-1787 Aug08 Sporton (Auden) **CALIBRATION CERTIFICATE** ET3DV6 - SN:1787 Object QA CAL-01.v6 and QA CAL-23.v3 Calibration procedure(s) Calibration procedure for dosimetric E-field probes August 26, 2008 Calibration date: Condition of the calibrated item In Tolerance This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI). The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate. All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%. Calibration Equipment used (M&TE critical for calibration) Primary Standards Cal Date (Certificate No.) Scheduled Calibration Power meter E4419B GB41293874 1-Apr-08 (No. 217-00788) Apr-09 Power sensor E4412A MY41495277 1-Apr-08 (No. 217-00788) Apr-09 Power sensor E4412A MY41498087 1-Apr-08 (No. 217-00788) Apr-09 Reference 3 dB Attenuator SN: S5054 (3c) 1-Jul-08 (No. 217-00865) Jul-09 Reference 20 dB Attenuator SN: S5086 (20b) 31-Mar-08 (No. 217-00787) Apr-09 Reference 30 dB Attenuator SN: S5129 (30b) 1-Jul-08 (No. 217-00866) Jul-09 Reference Probe ES3DV2 SN: 3013 2-Jan-08 (No. ES3-3013_Jan08) Jan-09 DAE4 SN: 660 3-Sep-07 (No. DAE4-660_Sep07) Sep-08 Secondary Standards ID# Check Date (in house) Scheduled Check RF generator HP 8648C US3642U01700 4-Aug-99 (in house check Oct-07) In house check: Oct-09 Network Analyzer HP 8753E US37390585 18-Oct-01 (in house check Oct-07) In house check: Oct-08 Calibrated by: Katja Pokovic Technical Manager Quality Manager Approved by: Niels Kuster Issued: August 26, 2008

Certificate No: ET3-1787_Aug08

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Calibration Laboratory of Schmid & Partner Engineering AG Zeughausstrasse 43, 8004 Zurich, Switzerland





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Accreditation No.: SCS 108

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Glossary:

TSI NORMx,y,z tissue simulating liquid sensitivity in free space

ConvF DCP

sensitivity in TSL / NORMx,y,z diode compression point

Polarization o

φ rotation around probe axis

Polarization 9

9 rotation around an axis that is in the plane normal to probe axis (at

measurement center), i.e., 9 = 0 is normal to probe axis

Calibration is Performed According to the Following Standards:

- a) IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005

Methods Applied and Interpretation of Parameters:

- NORMx, y, z: Assessed for E-field polarization $\vartheta = 0$ (f ≤ 900 MHz in TEM-cell; f > 1800 MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not effect the E²-field uncertainty inside TSL (see below *ConvF*).
- NORM(f)x,y,z = NORMx,y,z * frequency response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCPx,y,z: DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- ConvF and Boundary Effect Parameters: Assessed in flat phantom using E-field (or Temperature Transfer Standard for f ≤ 800 MHz) and inside waveguide using analytical field distributions based on power measurements for f > 800 MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORMx,y,z * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy): in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.

Certificate No: ET3-1787_Aug08

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ET3DV6 SN:1787

August 26, 2008

Probe ET3DV6

SN:1787

Manufactured:

May 28, 2003

Last calibrated:

August 28, 2007

Recalibrated:

August 26, 2008

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

Certificate No: ET3-1787_Aug08

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August 26, 2008

DASY - Parameters of Probe: ET3DV6 SN:1787

Sensitivity in	Free Space ^A
----------------	-------------------------

Diode Compression^B

NormX	1.63 ± 10.1%	$\mu V/(V/m)^2$	DCP X	90 mV
NormY	1.67 ± 10.1%	$\mu V/(V/m)^2$	DCP Y	93 mV
NormZ	2.18 ± 10.1%	$\mu V/(V/m)^2$	DCP Z	92 mV

Sensitivity in Tissue Simulating Liquid (Conversion Factors)

Please see Page 8.

Boundary Effect

TSL

00 MHz Typical SAR gradient: 5 % per mm

Sensor Cente	er to Phantom Surface Distance	3.7 mm	4.7 mm
SAR _{be} [%]	Without Correction Algorithm	11.3	7.5
SAR _{be} [%]	With Correction Algorithm	0.8	0.5

TSL

1750 MHz Typical SAR gradient: 10 % per mm

Sensor Cente	Sensor Center to Phantom Surface Distance		4.7 mm
SAR _{be} [%]	Without Correction Algorithm	10.1	6.5
SAR _{be} [%]	With Correction Algorithm	8.0	0.6

Sensor Offset

Probe Tip to Sensor Center

2.7 mm

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor k=2, which for a normal distribution corresponds to a coverage probability of approximately 95%.

Certificate No: ET3-1787_Aug08

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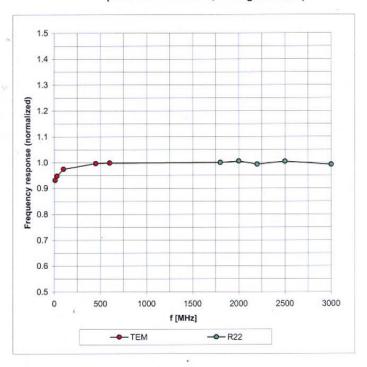
A The uncertainties of NormX,Y,Z do not affect the E²-field uncertainty inside TSL (see Page 8).

^B Numerical linearization parameter: uncertainty not required.

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Frequency Response of E-Field

(TEM-Cell:ifi110 EXX, Waveguide: R22)



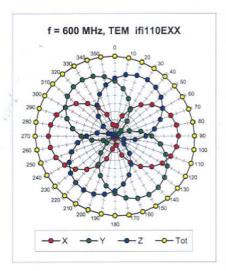
Uncertainty of Frequency Response of E-field: ± 6.3% (k=2)

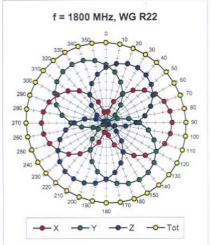
Certificate No: ET3-1787_Aug08

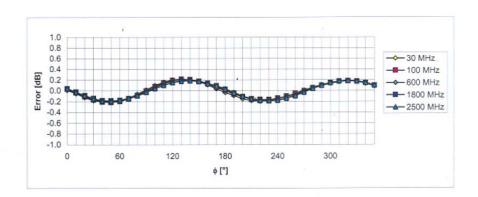
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August 26, 2008

Receiving Pattern (ϕ), ϑ = 0°







Uncertainty of Axial Isotropy Assessment: ± 0.5% (k=2)

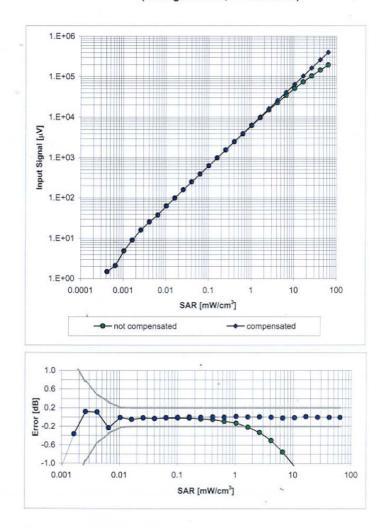
Certificate No: ET3-1787_Aug08

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August 26, 2008

Dynamic Range f(SAR_{head})

(Waveguide R22, f = 1800 MHz)



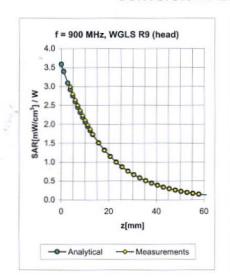
Uncertainty of Linearity Assessment: ± 0.6% (k=2)

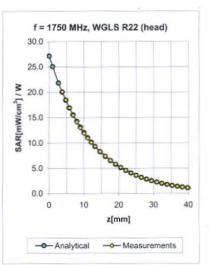
Certificate No: ET3-1787_Aug08

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Conversion Factor Assessment





f [MHz]	Validity [MHz] ^C	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
900	± 50 / ± 100	Head	41.5 ± 5%	0.97 ± 5%	0.30	2.80	6.06 ± 11.0% (k=2)
1750	± 50 / ± 100	Head	40.1 ± 5%	1.37 ± 5%	0.53	2.11	5.36 ± 11.0% (k=2)
1950	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.59	1.96	5.01 ± 11.0% (k=2)
2450	\pm 50 / \pm 100	Head	39.2 ± 5%	1,80 ± 5%	0.77	1.57	4.49 ± 11.0% (k=2)
				*			
900	± 50 / ± 100	Body	55.0 ± 5%	1.05 ± 5%	0.31	2.98	5.91 ± 11.0% (k=2)
1750	± 50 / ± 100	Body	53.4 ± 5%	$1.49 \pm 5\%$	0.60	2.20	4.73 ± 11.0% (k=2)
1950	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.68	1.95	4.49 ± 11.0% (k=2)
2450	±50/±100	Body	52.7 ± 5%	1.95 ± 5%	0.90	1.51	3.79 ± 11.0% (k=2)

Certificate No: ET3-1787_Aug08

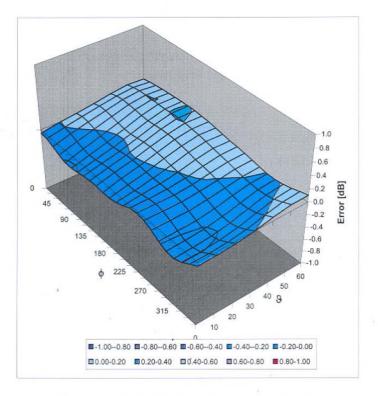
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^c The validity of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2). The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band.

August 26, 2008

Deviation from Isotropy in HSL

Error (φ, θ), f = 900 MHz



Uncertainty of Spherical Isotropy Assessment: ± 2.6% (k=2)

Certificate No: ET3-1787_Aug08

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Sporton (Auden)

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Accreditation No.: SCS 108

Certificate No: DAE3-577_Nov08

CALIBRATION CERTIFICATE

DAE3 - SD 000 D03 AA - SN: 577 Object

QA CAL-06.v12 Calibration procedure(s)

Calibration procedure for the data acquisition electronics (DAE)

November 12, 2008 Calibration date:

Condition of the calibrated item In Tolerance

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI). The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID#	Cal Date (Certificate No.)	Scheduled Calibration
Fluke Process Calibrator Type 702	SN: 6295803	30-Sep-08 (No: 7673)	Sep-09
Keithley Multimeter Type 2001	SN: 0810278	30-Sep-08 (No: 7670)	Sep-09
	1		
Secondary Standards	ID#	Check Date (in house)	Scheduled Check

Calibrated by:

Name Andrea Guntli Function Technician

Approved by:

Fin Bomholt

R&D Director

Issued: November 12, 2008

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Certificate No: DAE3-577_Nov08

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Accreditation No.: SCS 108

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Glossary

DAE

data acquisition electronics

Connector angle

information used in DASY system to align probe sensor X to the robot

coordinate system.

Methods Applied and Interpretation of Parameters

- DC Voltage Measurement: Calibration Factor assessed for use in DASY system by comparison with a calibrated instrument traceable to national standards. The figure given corresponds to the full scale range of the voltmeter in the respective range.
- Connector angle: The angle of the connector is assessed measuring the angle mechanically by a tool inserted. Uncertainty is not required.
- The following parameters as documented in the Appendix contain technical information as a result from the performance test and require no uncertainty.
 - DC Voltage Measurement Linearity: Verification of the Linearity at +10% and -10% of the nominal calibration voltage. Influence of offset voltage is included in this measurement.
 - Common mode sensitivity: Influence of a positive or negative common mode voltage on the differential measurement.
 - Channel separation: Influence of a voltage on the neighbor channels not subject to an input voltage.
 - AD Converter Values with inputs shorted: Values on the internal AD converter corresponding to zero input voltage
 - Input Offset Measurement: Output voltage and statistical results over a large number of zero voltage measurements.
 - Input Offset Current: Typical value for information; Maximum channel input offset current, not considering the input resistance.
 - Input resistance: DAE input resistance at the connector, during internal auto-zeroing and during measurement.
 - Low Battery Alarm Voltage: Typical value for information. Below this voltage, a battery alarm signal is generated.
 - Power consumption: Typical value for information. Supply currents in various operating modes.

Certificate No: DAE3-577 Nov08

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DC Voltage Measurement

A/D - Converter Resolution nominal

High Range: $1LSB = 6.1\mu V$, full range = -100...+300 mVLow Range: 1LSB = 61nV, full range = -1......+3mV

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

Calibration Factors	X	Y	Z
High Range	404.437 ± 0.1% (k=2)	403.882 ± 0.1% (k=2)	404.321 ± 0.1% (k=2)
Low Range	3.93985 ± 0.7% (k=2)	3.94699 ± 0.7% (k=2)	3.94542 ± 0.7% (k=2)

Connector Angle

Connector Angle to be used in DASY system	268 ° ± 1 °
---	-------------

Certificate No: DAE3-577_Nov08

Appendix

1. DC Voltage Linearity

High Range	Input (μV)	Reading (μV)	Error (%)
Channel X + Input	200000	200000.5	0.00
Channel X + Input	20000	20006.28	0.03
Channel X - Input	20000	-19997.96	-0.01
Channel Y + Input	200000	199999.8	0.00
Channel Y + Input	20000	20003.35	0.02
Channel Y - Input	20000	-20003.31	0.02
Channel Z + Input	200000	200000.3	0.00
Channel Z + Input	20000	20006.28	0.03
Channel Z - Input	20000	-19999.42	0.00

Low Range	Input (μV)	Reading (µV)	Error (%)
Channel X + Input	2000	2000	0.00
Channel X + Input	200	200.64	0.32
Channel X - Input	200	-199.61	-0.19
Channel Y + Input	2000	2000	0.00
Channel Y + Input	200	199.39	-0.31
Channel Y - Input	200	-201.03	0.52
Channel Z + Input	2000	2000	0.00
Channel Z + Input	200	199.42	-0.29
Channel Z - Input	200	-200.73	0.36

2. Common mode sensitivity

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	Common mode Input Voltage (mV)	High Range Average Reading (μV)	Low Range Average Reading (μV)
Channel X	200	13.38	13.83
	- 200	-13.53	-13.82
Channel Y	200	-5.55	-6.09
	- 200	5.06	5.66
Channel Z	200	-1.00	-0.72
	- 200	-0.80	-0.52

3. Channel separation

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	Input Voltage (mV)	Channel X (μV)	Channel Y (μV)	Channel Z (μV)
Channel X	200	-	1.66	0.50
Channel Y	200	1.90	-	3.95
Channel Z	200	-0.95	0.48	•

Certificate No: DAE3-577_Nov08

4. AD-Converter Values with inputs shorted

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	High Range (LSB)	Low Range (LSB)
Channel X	15967	16080
Channel Y	15851	16385
Channel Z	16197	16100

5. Input Offset Measurement

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec Input $10M\Omega$

	Average (μV)	min. Offset (μV)	max. Offset (μV)	Std. Deviation (µV)
Channel X	1.13	-1.22	2.29	0.58
Channel Y	-1.51	-2.99	0.83	0.52
Channel Z	0.02	-0.89	0.92	0.38

6. Input Offset Current

Nominal Input circuitry offset current on all channels: <25fA

7. Input Resistance

	Zeroing (MOhm)	Measuring (MOhm)
Channel X	0.2000	198.6
Channel Y	0.2001	199.4
Channel Z	0.2000	198.8

8. Low Battery Alarm Voltage (verified during pre test)

Typical values	Alarm Level (VDC)	
Supply (+ Vcc)	+7.9	
Supply (- Vcc)	-7.6	

9. Power Consumption (verified during pre test)

Typical values	Switched off (mA)	Stand by (mA)	Transmitting (mA)
Supply (+ Vcc)	+0.0	+6	+14
Supply (- Vcc)	-0.01	-8	-9

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Sporton (Auden)

Accreditation No.: SCS 108

Certificate No: D2450V2-736_Jul07 CALIBRATION CERTIFICATE D2450V2 - SN: 736 Object Calibration procedure(s) QA CAL-05.v6 Calibration procedure for dipole validation kits July 12, 2007 Calibration date: Condition of the calibrated item In Tolerance This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI). The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate. All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%. Calibration Equipment used (M&TE critical for calibration) Primary Standards ID# Cal Date (Calibrated by, Certificate No.) Scheduled Calibration Power meter EPM-442A GB37480704 03-Oct-06 (METAS, No. 217-00608) Oct-07 Power sensor HP 8481A US37292783 03-Oct-06 (METAS, No. 217-00608) Oct-07 Reference 20 dB Attenuator SN: 5086 (20g) 10-Aug-06 (METAS, No 217-00591) Aug-07 SN: 5047.2 (10r) Reference 10 dB Attenuator 10-Aug-06 (METAS, No 217-00591) Aug-07 Reference Probe ES3DV3 SN 3025 19-Oct-06 (SPEAG, No. ES3-3025_Oct06) Oct-07 DAE4 SN 601 30-Jan-07 (SPEAG, No. DAE4-601_Jan07) Secondary Standards ID# Check Date (in house) Scheduled Check Power sensor HP 8481A MY41092317 18-Oct-02 (SPEAG, in house check Oct-05) In house check: Oct-07 RF generator Agilent E4421B MY41000675 11-May-05 (SPEAG, in house check Nov-05) In house check: Nov-07 Network Analyzer HP 8753E US37390585 S4206 18-Oct-01 (SPEAG, in house check Oct-06) In house check: Oct-07 Name Function Calibrated by: Mike Melli Laboratory Technician Approved by: Katja Pokovic Technical Manager Issued: July 12, 2007 This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

Certificate No: D2450V2-736_Jul07

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Accreditation No.: SCS 108

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Multilateral Agreement for the recognition of calibration certificates

Glossary:

TSL

tissue simulating liquid

ConvF N/A sensitivity in TSL / NORM x,y,z not applicable or not measured

Calibration is Performed According to the Following Standards:

- a) IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005
- c) Federal Communications Commission Office of Engineering & Technology (FCC OET), "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields; Additional Information for Evaluating Compliance of Mobile and Portable Devices with FCC Limits for Human Exposure to Radiofrequency Emissions", Supplement C (Edition 01-01) to Bulletin 65

Additional Documentation:

d) DASY4 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions: Further details are available from the Validation Report at the end
 of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL: The dipole is mounted with the spacer to position its feed
 point exactly below the center marking of the flat phantom section, with the arms oriented
 parallel to the body axis.
- Feed Point Impedance and Return Loss: These parameters are measured with the dipole
 positioned under the liquid filled phantom. The impedance stated is transformed from the
 measurement at the SMA connector to the feed point. The Return Loss ensures low
 reflected power. No uncertainty required.
- Electrical Delay: One-way delay between the SMA connector and the antenna feed point.
 No uncertainty required.
- · SAR measured: SAR measured at the stated antenna input power.
- SAR normalized: SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters: The measured TSL parameters are used to calculate the nominal SAR result.

Certificate No: D2450V2-736_Jul07

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Measurement Conditions

DASY system configuration, as far as not given on page 1.

DASY Version	DASY4	V4.7
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom V5.0	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	*
Frequency	2450 MHz ± 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	38.6 ± 6 %	1.81 mho/m ± 6 %
Head TSL temperature during test	(22.0 ± 0.2) °C	215-705	<u></u>

SAR result with Head TSL

SAR averaged over 1 cm ³ (1 g) of Head TSL	condition	
SAR measured	250 mW input power	13.3 mW / g
SAR normalized	normalized to 1W	53.2 mW / g
SAR for nominal Head TSL parameters 1	normalized to 1W	52.7 mW / g ± 17.0 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	6.17 mW / g
SAR normalized	normalized to 1W	24.7 mW / g
SAR for nominal Head TSL parameters 1	normalized to 1W	24.5 mW / g ± 16.5 % (k=2)

Certificate No: D2450V2-736_Jul07

¹ Correction to nominal TSL parameters according to d), chapter "SAR Sensitivities"

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	52.7	1.95 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	53.5 ± 6 %	1.94 mho/m ± 6 %
Body TSL temperature during test	(22.0 ± 0.2) °C		

SAR result with Body TSL

SAR averaged over 1 cm ³ (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	13.0 mW / g
SAR normalized	normalized to 1W	52.0 mW / g
SAR for nominal Body TSL parameters ²	normalized to 1W	52.5 mW / g ± 17.0 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Body TSL	Condition	
SAR measured	250 mW input power	6.05 mW / g
SAR normalized	normalized to 1W	24.2 mW / g
SAR for nominal Body TSL parameters 2	normalized to 1W	24.4 mW / g ± 16.5 % (k=2)

Certificate No: D2450V2-736_Jul07

² Correction to nominal TSL parameters according to d), chapter "SAR Sensitivities"

Appendix

Antenna Parameters with Head TSL

Impedance, transformed to feed point	53.1 Ω + 3.0 jΩ	
Return Loss	- 27.6 dB	

Antenna Parameters with Body TSL

Impedance, transformed to feed point	$48.7 \Omega + 4.6 j\Omega$	
Return Loss	– 26.3 dB	

General Antenna Parameters and Design

		_
Electrical Delay (one direction)	1.158 ns	

After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
Manufactured on	August 26, 2003

Certificate No: D2450V2-736_Jul07

DASY4 Validation Report for Head TSL

Date/Time: 12.07.2007 11:00:03

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN736

Communication System: CW-2450; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium: HSL U10 BB;

Medium parameters used: f = 2450 MHz; $\sigma = 1.81$ mho/m; $\varepsilon_r = 38.6$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY4 (High Precision Assessment)

DASY4 Configuration:

Probe: ES3DV2 - SN3025 (HF); ConvF(4.5, 4.5, 4.5); Calibrated: 19.10.2006

Sensor-Surface: 4mm (Mechanical Surface Detection)

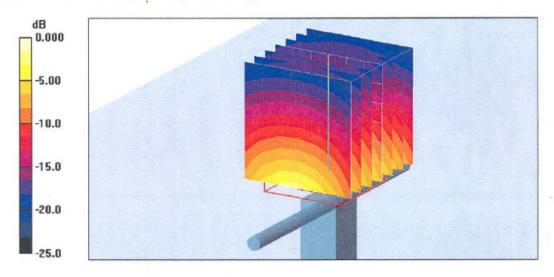
- Electronics: DAE4 Sn601; Calibrated: 30.01.2007
- Phantom: Flat Phantom 5.0 (front); Type: QD000P50AA
- Measurement SW: DASY4, V4.7 Build 53; Postprocessing SW: SEMCAD, V1.8 Build 172

Pin = 250 mW; d = 10 mm/Zoom Scan (7x7x7)/Cube 0:

Measurement grid: dx=5mm, dy=5mm, dz=5mm Reference Value = 93.0 V/m; Power Drift = -0.004 dB

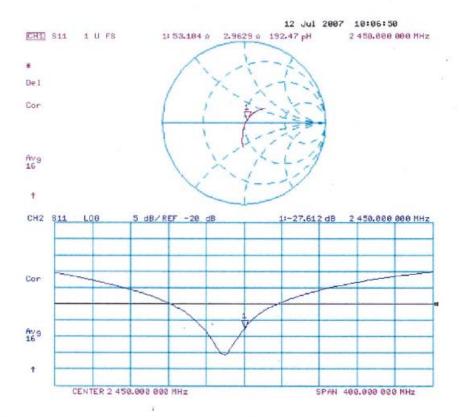
Peak SAR (extrapolated) = 28.1 W/kg

SAR(1 g) = 13.3 mW/g; SAR(10 g) = 6.17 mW/gMaximum value of SAR (measured) = 15.0 mW/g



0 dB = 15.0 mW/g

Impedance Measurement Plot for Head TSL



DASY4 Validation Report for Body TSL

Date/Time: 12.07.2007 12:28:49

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN736

Communication System: CW-2450; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium: MSL U10 BB;

Medium parameters used: f = 2450 MHz; $\sigma = 1.94 \text{ mho/m}$; $\varepsilon_r = 53.5$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Measurement Standard: DASY4 (High Precision Assessment)

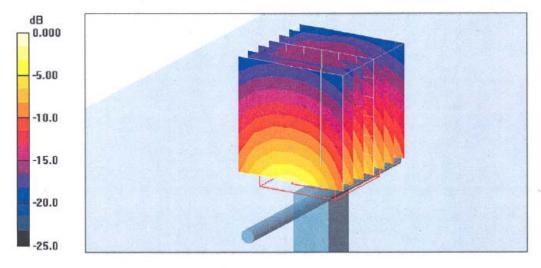
DASY4 Configuration:

- Probe: ES3DV2 SN3025 (HF); ConvF(4.16, 4.16, 4.16); Calibrated: 19.10.2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 30.01.2007
- Phantom: Flat Phantom 5.0 (back); Type: QD000P50AA
- Measurement SW: DASY4, V4.7 Build 53; Postprocessing SW: SEMCAD, V1.8 Build 172

Pin = 250 mW; d = 10 mm/Zoom Scan (7x7x7)/Cube 0:

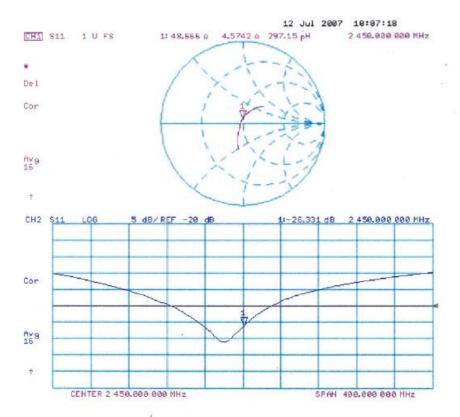
Measurement grid: dx=5mm, dy=5mm, dz=5mm Reference Value = 88.6 V/m; Power Drift = 0.005 dB Peak SAR (extrapolated) = 27.0 W/kg SAR(1 g) = 13 mW/g; SAR(10 g) = 6.05 mW/g

SAR(1 g) = 13 mW/g; SAR(10 g) = 6.05 mW/gMaximum value of SAR (measured) = 14.8 mW/g



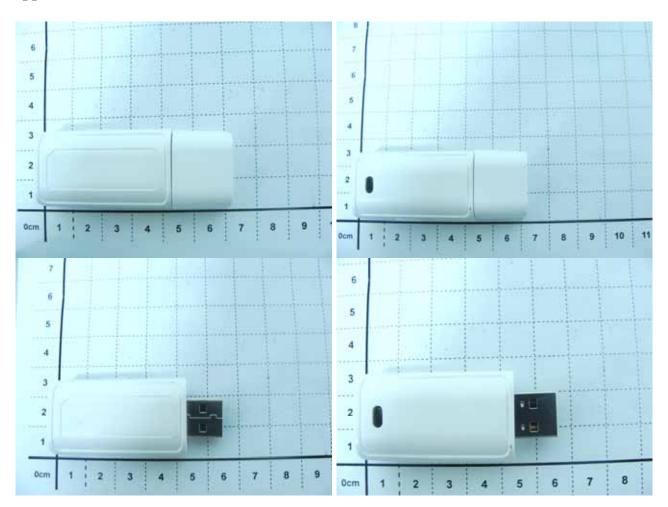
0 dB = 14.8 mW/g

Impedance Measurement Plot for Body TSL





Appendix D - Product Photos

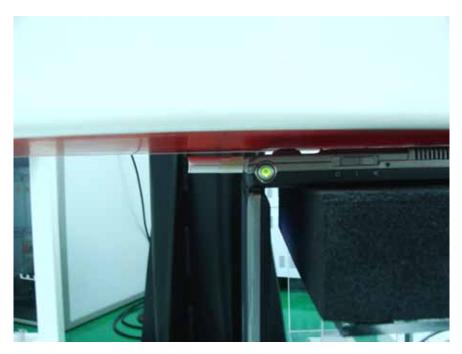


TEL: 886-3-327-3456 FAX: 886-3-328-4978 FCC ID: I88NWD270N Report Issued Date : Dec, 29, 2008
Report Version : Rev. 01

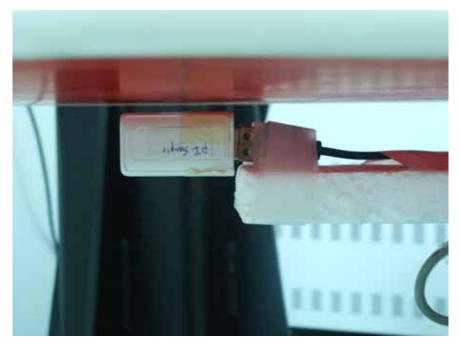
Report No.: FA860629-04



Appendix E - Test Setup Photos



Configuration 1 (Horizontal Up)



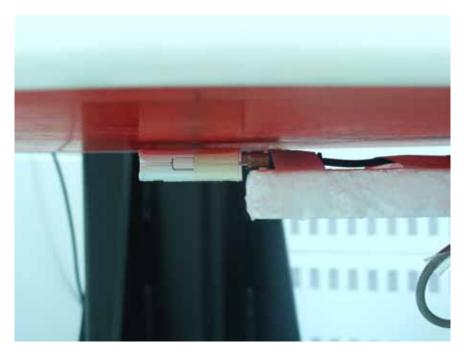
Configuration 2 (Vertical Front)

TEL: 886-3-327-3456 FAX: 886-3-328-4978 FCC ID: I88NWD270N Report Issued Date : Dec, 29, 2008

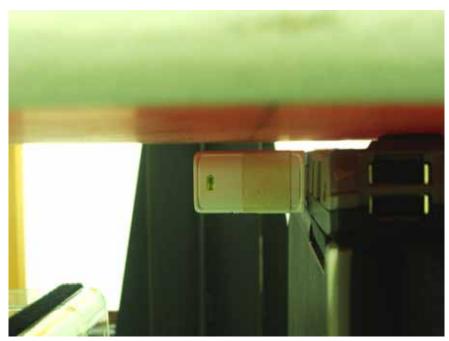
Report No.: FA860629-04

Report Version : Rev. 01





Configuration 3 (Horizontal Down)



Configuration 4 (Vertical Back)

TEL: 886-3-327-3456 FAX: 886-3-328-4978 FCC ID: I88NWD270N Report Issued Date : Dec, 29, 2008
Report Version : Rev. 01

Report No.: FA860629-04