CETECOM™

SAR Test Report

FOR:

Manufacturer: Garmin International
Model Number: 0247901
Model Name: nuLink! 2390
FCC ID: IPH-0247901

Test Report #: SAR_GARMI_033_11001_FCC_rev2

Date of Report: 2011-05-10

ilac-MRA

A2LA **ACCREDITED**
TESTING LABORATORY
Certificate #2135.01

Bluetooth
Bluetooth Qualification
Test Facility
(BQTF)

CTIA Authorized Test Lab
LAB CODE 20020328-00

FCC Listed #:
A2LA Accredited

IC Recognized #
3462B-1

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1.   Assessment

The following device was tested against the limits for general population uncontrolled exposure specified in FCC 2.1093. The device was tested according to measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C (Edition 01-01) and IEEE 1528/D1.2, April 21, 2003 and no deviations were ascertained during the course of the tests performed.

Company	Description	Model #
Garmin International	Connected Personal Navigation Device	0247901

Responsible for Testing Laboratory:

		Sajay Jose	
2011-05-10	Compliance	(Test Lab Manager)	
Date	**Section**	**Name**	**Signature**

Responsible for the Report:

		Josie Sabado	
2011-05-10	Compliance	(Project Engineer)	
Date	**Section**	**Name**	**Signature**

The test results of this test report relate exclusively to the test item specified in Section3.
CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. 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 CETECOM Inc. USA.

2. Administrative Data

2.1. Identification of the Testing Laboratory Issuing the EMC Test Report

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2.2. Identification of the Client

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Country	USA
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2.3. Identification of the Manufacturer

Manufacturer's Name:	Garmin International Inc.
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Country	Taiwan

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3. Equipment under Test (EUT)

3.1. Specification of the Equipment under Test

Product Type:	Portable
RF Exposure Environment:	General/Uncontrolled
Marketing Name:	nuLink! 2390
Model No:	0247901
Supported Radios:	GSM/GPRS/EGPRS Cellular Bluetooth +2.1EDR
Hardware Revision :	6.0
Software Revision :	2.00
FCC-ID:	IPH-0247901
Frequency Range:	GSM 850: 824.2-848.8MHz PCS 1900: 1850.2-1909.8MHz Bluetooth: 2400-2483.5MHz
Number of Channels:	GSM850: 125 PCS 1900: 300 Bluetooth: 79
Type(s) of Modulation:	GSM 850/PCS 1900: GMSK, 8PSK Bluetooth: GFSK, π/4 DQPSK, 8DPSK
Modes of Operation:	GPRS/EGPRS, MS Class 10, Capability Class B Bluetooth+2.1EDR
Antenna Type:	Cellular: IFA Antenna, 0dBi Peak gain 824-960MHz; 2 dBi Peak gain 1710-1990MHz Bluetooth: Integral Chip antenna / 2.2dBic Peak Gain
Maximum Condcuted Output Power:	GSM850: 32.3dBm PCS1900: 28.8dBm Bluetooth: 5.0dBm

3.2. Identification of the Equipment Under Test (EUT)

EUT #	Serial Number	HW Version	SW Version
1	25A000119	6	2.00

3.3. Identification of Accessory equipment

No accessory equipment

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4. Subject of Investigation

The objective of the measurements done by Cetecom Inc. was the dosimetric assessment of one device. The tests were performed in configurations for devices operated next to a person's body. The examinations were carried out with the dosimetric assessment system DASY52 described in Section 6.

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

In the USA the recent FCC exposure criteria [FCC 2001] are based upon the IEEE Standard C95.1 [IEEE 1999]. The IEEE standard C95.1 sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz.

4.2. Distinction Between Exposed Population, Duration of Exposure and Frequencies

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

4.3. Distinction between Maximum Permissible Exposure and SAR Limits

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

$$SAR \; = \; \sigma \frac{E2}{\rho} \; = \; c \left. \frac{\partial T}{\partial t} \right|_{t \to 0+}$$

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

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

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

4.4. SAR Limit

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

The EUT described in section 3 is normally used while held in the hands. The SAR limit for this exposure condition is 4.0 W/kg averaged over a mass of 10g.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 10 g (SAR$_{10g}$) with the shape of a cube.

Standard	Exposure Condition	Status	SAR limit (W/kg)
IEEE C95.1	Hands, Wrists, Feet and Ankles	In force	4.0

Table 1: Relevant spatial peak SAR limit averaged over a mass of 10 g

5.   The FCC Measurement Procedure

The Federal Communications Commission (FCC) has published a report and order on the 1st of August 1996 [FCC 1996], which requires routine dosimetric assessment of mobile telecom-communications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure
to radiofrequency emissions [FCC 2001]. The following KDB Publications have also been used:

> 447498 – Mobile and portable device RF Exposure Procedures
> 648474 – SAR Evaluation Considerations for Handsets with Multiple Transmitters

5.1.   General Requirements

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

5.2.   Body-worn and Other Configurations

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

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

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

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

5.3. Procedure for assessing the peak spatial-average SAR

Step 1: Power reference measurement:

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

Step 2: Area scan

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

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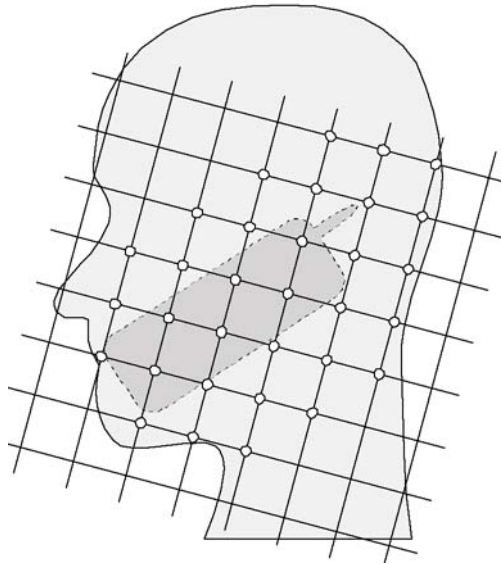
Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

Step 3: Zoom scan

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

The maximum spatial-average SAR is determined by a numerical analysis of the SAR values obtained in the volume of the zoom scan, whereby interpolation (between measured points) and extrapolation (between surface and closest measured points) routines should be applied. A 3-D-spline algorithm [Press, et al, 1996], [Kreyszig, 1983], [Brishoual, 2001] can be used for interpolation and a trapezoidal algorithm for the integration (averaging). Scan resolutions of larger than 2 mm can be used provided the uncertainty is evaluated according to E (see E.5).

In some areas of the phantom, such as the jaw and upper head region, the angle of the probe with respect to the line normal to the surface might become large, e.g., at angles larger than ± 30º (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced (<30º).

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Step 4: Power reference measurement

The local SAR should be measured at exactly the same location as in Step 1. The absolute value of the measurement drift (the difference between the SAR measured in Step 4 and Step 1) should be recorded in the uncertainty budget. It is recommended that the drift be kept within ± 5%. If this is not possible, even with repeat testing, additional information may be used to demonstrate the power stability during the test. Power reference measurements can be taken after each zoom scan, if more than one zoom scan is needed. However, the drift should always be referred to the initial state with fully charged battery.

5.4.   Determination of the largest peak spatial-average SAR

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

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

a) all device positions (cheek and tilt, for both left and right sides of the SAM phantom,

b) all configurations for each device position in (a), e.g. antenna extended and retracted, and

c) all operational modes for each device position in (a) and configuration in (b) in each frequency band, e.g. analog and digital.

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

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

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

6.   The Measurement System

6.1.   Robot system specification

The SAR measurement system being used is the SPEAG DASY52 system, which consists of a Stäubli TX90XL 6-axis robot arm and CS8c controller, SPEAG SAR Probe, Data Acquisition Electronics, and SAM Twin Phantom. The robot is used to articulate the probe to programmed positions inside the phantom to obtain the SAR readings from the EUT.

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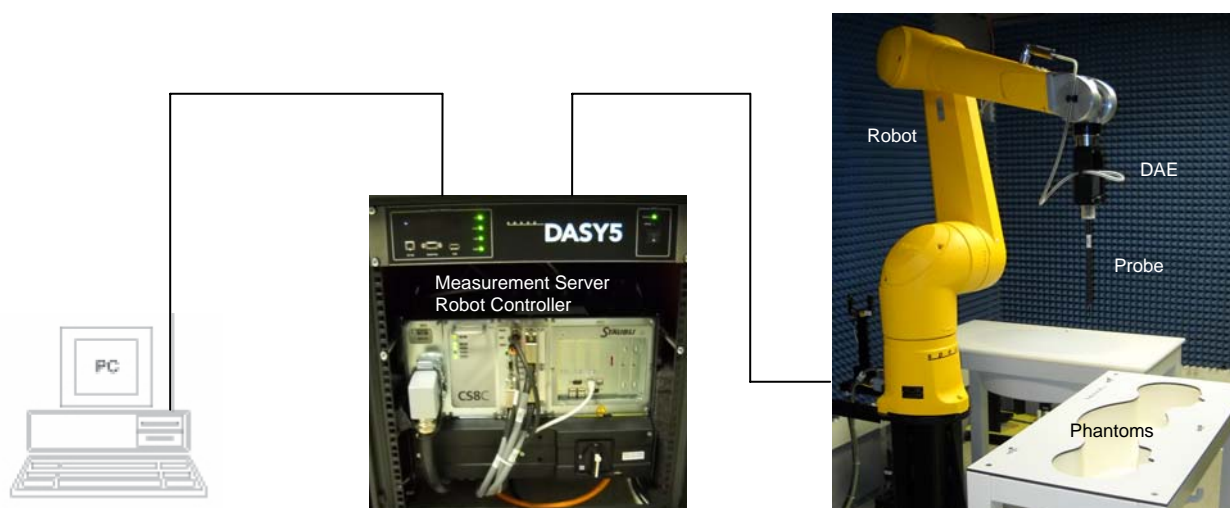

Figure 5: Schematic diagram of the SAR measurement system

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

6.2.   Isotropic E-Field Probe for Dosimetric Measurements

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

6.3.   Data Acquisition Electronics

The DAE contains a signal amplifier, multiplexer, 16bit A/D converter and control logic. It uses an optical link for communication with the DASY5 system. The DAE has a dynamic range of   -100 to 300 mV. It also contains a two step probe touch detector for mechanical surface detection and emergency robot stop.

6.4.   Phantoms

The Twin SAM V4.0 Phantom is designed to specifications defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region.

6.5.   Interpolation and Extrapolation schemes

The interpolation, extrapolation and maximum search routines are all based on the modifed 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. The routines construct a once-continuously differentiable function that interpolates the measurement values.

7.   Uncertainty Assessment

Measurement uncertainty values were evaluated for SAR measurements performed by Cetecom Inc. The uncertainty values for components specified in *FCC Supplement C (01-01) to OET Bulletin 65 (97-01)* were evaluated according to the procedures of *IEEE 1528-200X December 29, 2002, NIST 1297 1994 edition and ISO Guide to the Expression of Uncertainty in Measurements (GUM).*

7.1.   Measurement Uncertainty Budget

a	*b*	*c*	*d*	*e = f(d,k)*	*f*	$g = c \times f / e$	*k*
Uncertainty Component	**Sec.**	**Tol. (± %)**	**Prob. Dist.**	**Div.**	c_i **(1-g)**	**1-g** u_i **(±%)**	v_i
Measurement System							
Probe Calibration	E2.1	5.5	N	1	1	5.5	∞
Axial Isotropy	E2.2	4.7	R	√3	0.7	1.9	∞
Hemispherical Isotropy	E2.2	9.6	R	√3	0.7	3.9	∞
Boundary Effect	E2.3	1.0	R	√3	1	0.6	∞
Linearity	E2.4	4.7	R	√3	1	2.7	∞
System Detection Limits	E2.5	1.0	R	√3	1	0.6	∞
Readout Electronics	E2.6	0.3	N	1	1	0.3	∞
Response Time	E2.7	0.8	R	√3	1	0.5	∞
Integration Time	E2.8	2.6	R	√3	1	1.5	∞
RF Ambient Noise	E6.1	3.0	R	√3	1	1.7	∞
RF Ambient Reflections	E6.1	3.0	R	√3	1	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.4	R	√3	1	0.2	∞
Probe Positioning with respect to Phantom Shell	E6.3	2.9	R	√3	1	1.7	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	1.0	R	√3	1	0.6	∞
Test sample Related							
Test Sample Positioning	E4.2	2.9	N	1	1	2.9	*145*
Device Holder Uncertainty	E4.1	3.6	N	1	1	3.6	*5*
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	√3	1	2.9	∞
Phantom and Tissue Parameters							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	4.0	R	√3	1	2.3	∞
Liquid Conductivity Target - tolerance	E3.2	5.0	R	√3	0.7	1.8	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.5	N	1	0.7	1.6	∞
Liquid Permittivity Target tolerance	E3.2	5.0	R	√3	0.6	1.7	∞
Liquid Permittivity - measurement uncertainty	E3.3	2.5	N	1	0.6	1.5	∞
Combined Standard Uncertainty			RSS			**± 10.7%**	
Expanded Uncertainty (95% CONFIDENCE INTERVAL)			*k=* 2.00705			**± 21.4%**	

8. Test results summary

8.1. Conducted Average Output Power

Measurement uncertainty for conducted measurements is ±0.5dB

GSM/(E)GPRS

Band	Channel	Frequency [MHz]	Average Power [dBm]			
			GPRS 1uplink timeslot	GPRS 2 uplink timeslots	EGPRS 1 uplink timeslot	EGPRS 2 uplink timeslots
GSM850	128	824.2	33.4	33.4	27.7	27.5
	190	836.6	33.2	33.2	27.7	27.6
	251	848.8	33.1	33.1	27.8	27.6
PCS1900	512	1850.2	30.2	30.2	26.7	26.4
	661	1880	30.2	30.1	26.6	26.3
	810	1909.8	30.1	30.1	26.4	26.2

Bluetooth*

Channel	Frequency [MHz]	Peak Power [dBm]		
		GFSK	π/4 DQPSK	8-DPSK
0	2402	5.0	4.9	5.0
39	2441	4.5	4.4	4.6
78	2480	4.1	4.0	4.2

*Conducted Bluetooth measurements are leveraged from EMC test report number EMC_GARMI_033_11001_15.247_Rev1 section 6.3.5.

8.2. SAR Scaling Due to Low-Duty Factor

The device meets the following qualifications for SAR test reduction as per the October 2009 TCB workshop "SAR Measurement Procedures" presentation:

No voice capability
Sporadic or intermittent transmissions
Employs location-based services

This device's behavior follows Garmin's 1690 and 1695 connected products that have already been certified by the FCC under the same SAR test reduction. This device has a smaller form factor. This device employs infrequent, short duration data communications and does not support GSM voice. The device will normally operate in either GPRS or EGPRS mode, but for analysis purposes, rather than considering the modes separately, a more conservative analysis combining the two modes has been provided.

The device supports GPRS and EGPRS multislot class 10. This allows a total of 5 timeslots, but restricts the uplink to 1 or two timeslots only (the supported modes are uplink:downlink - 1:1, 1:2, 1:3, 1:4, 2:1, 2:2, 2:3). The device supports thirteen data schemes (CS-1 through CS-4 and MCS1 through MCS9).

The slowest scheme is CS-1, which per 3GPP standards has a data rate of 9.05 kb/s per timeslot. Therefore the slowest possible uplink data rate is 9.05 kb/s with one timeslot (two timeslots would yield 18.1 kb/s).

The fastest scheme is MCS-9, which per 3GPP standards has a data rate of 59.2 kb/s per timeslot. Therefore, with the four downlink timeslots, the fastest possible data rate is 236.8 kb/s.

The device supports several user-initiated, location-based service transactions that will be used in this duty cycle calculation.

User Initiated Duty Cycle
The user-initiated transactions include such items as flight status inquiries, weather information and Google Local Search inquiries. Google Local Search returns business or personal address and contact information that can be used for navigation. The worst case user-initiated transaction is a Google Local Search of one character coupled with an error response. The user would then go back to the Google Local Search text entry form, delete the previous search letter, enter a different letter and execute the search again. An error response would be returned again. A different letter is needed each time because the 2390 implements local caching of search results. If the same letter was searched again, the 2390 would return the same results from local cache, never sending data over the cellular network.

The maximum theoretical uplink package size for a Google Local Search of one character is 219 bytes, which is equivalent to 1,752 bits. At the slowest possible uplink speed of 9.05 kb/s or 9,267.2 b/s, the longest possible data transmission would take 0.189 seconds.

The minimum theoretical downlink package size for an error response is 225 bytes, which is equivalent to 1,800 bits. At the fastest supported downlink rate (MCS-9 with four timeslots with an over downlink rate of 236.8 kb/s or 242,483.2 b/s), the minimum transmission time for the downlink package is 0.007 seconds.

The cycle time was calculated using the following process:
1. Put device on Local Search keyboard page
2. Start timer
3. Enter a single character
4. Press Done
5. Immediately press Back (without waiting for results)
6. Erase previously entered character (required due to new caching layer)
7. Repeat steps 3 through 6 for each of the 36 characters on the keyboard
8. Stop timer

The total time for this process was 1 minute, 48 seconds. There are 36 characters that were used as a search character. Therefore, the average cycle time is 108 seconds / 36 = 3.00 seconds. However, this time includes the uplink and downlink transmissions. If these are subtracted, the cycle time is 3.00 – 0.189 – 0.007 = 2.80 seconds.

Assuming a continuous cycle of 0.189 seconds uplink, 0.007 seconds downlink and a 2.80 second cycle time to restart the process, the duty cycle is 0.189 / (0.189 + 0.007 + 2.80) = 0.0631 or a 6.31% duty cycle.

8.3. Test Positions and Configurations

The area scan is over the transmitting antenna. The front, back, right edge, top edge, and bottom edge of the EUT were tested with 0mm air gap between the EUT and the body phantom. See Appendix B for test setup photos.

The calculated duty cycle from section 8.2 is applied to the measured SAR value. If the scaled SAR value on the middle channel was more than 3dB below the limit, high and low channels were not evaluated.

Two timeslots were used to achieve maximum source-based time-averaged output power. EGPRS was not evaluated as per KDB 941225 and IEEE 1528-2003 footnote 11. SAR evaluation for low-power modes are required for devices that produced a peak SAR larger than one half of the compliance limit. The scaled SAR value is considered here. The highest scaled SAR value for GPRS is 0.230 W/kg, less than one half of the 4.0 W/kg limit. SAR evaluation for EGPRS is not required.

The EUT is normally used while held in the hands. SAR values reported here are 10g averaged SAR values.

The separation distance between the GSM antenna and the Bluetooth antenna is 10.5cm. The peak output power for Bluetooth is 5.0dBm (3.16mW). According to FCC KDB 447498, section 1) b), test exclusion procedures given in KDB 648474 section 3 are used because output power is less than $60/f_{(GHz)}$. Bluetooth stand alone SAR is not required because the output power is less than 24mW and the GSM antenna is greater than 5cm from the Bluetooth antenna. According to FCC KDB 447498, section 3) b) i) and KDB 648474, section 4, Simultaneous transmission SAR evaluation is not required because the sum of 10g scaled SAR values measured for all simultaneous transmitting antennas is 0.230 W/kg, less than the 4.0 W/kg limit.

8.4. SAR results

Band	Operation Mode	Channel	Frequency (MHz)	Position	Measured SAR 10g (W/kg)	Scaled SAR 10g (W/kg)	Area Scan (Appendix A)	Positioning Photo (Appendix B)
GSM 850	2 uplink timeslots	190	836.6	Front	0.817	0.052	Plot 1	Photo 1
				Back	2.15	0.136	Plot 2	Photo 2
				Right Edge	1.23	0.078	Plot 3	Photo 3
				Top Edge	1.52	0.096	Plot 4	Photo 4
				Bottom Edge	1.34	0.085	Plot 5	Photo 5
PCS 1900	2 uplink timeslots	661	1880	Front	1.05	0.066	Plot 6	Photo 1
				Back	3.07	0.194	Plot 7	Photo 2
				Right Edge	3.65	0.230	Plot 8	Photo 3
				Top Edge	0.203	0.013	Plot 9	Photo 4
				Bottom Edge	0.951	0.060	Plot 10	Photo 5

8.5. SAR Results Extrapolated to Upper Tolerance Limit

TCB Workshop presentation "RF Exposure Procedure Review" April 2010 states test results must demonstrate compliance when results are extrapolated to the upper tune-up tolerance limit, with respect to the maximum measured output power of the test sample, to ensure all production units are compliant. The table below extrapolates the measured SAR results to the upper tune-up tolerance limit of licensed bands. Only the highest scaled SAR results of each band are shown.

Band	Channel	Frequency (MHz)	Measured Avg Output Power (dBm)	Upper Tolerance Limit (dBm)	Scaled SAR 10g (W/kg)	Extrapolated SAR 10g (W/kg)
GSM 850	190	836.6	33.2	35	0.136	0.205
PCS 1900	661	1880	30.1	32	0.230	0.357

8.6. Dipole verification

Prior to formal testing at each frequency a system verification was performed in accordance with IEEE 1528 and the 1 Watt reference SAR value is taken from the Speag dipole calibration report. All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

Date	Frequency (MHz)	CW input at dipole feed (Watts)	10g SAR (W/kg)	1 Watt reference SAR value (W/kg)	Difference reference SAR value to normalized SAR	Area scan (See Appendix A)
2011-03-28	835	1	6.67	6.68	-0.15%	Plot 11
2011-03-25	1900	1	22.4	21.4	4.67%	Plot 12
2011-03-26	1900	1	22.0	21.4	2.80%	Plot 13

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9.   References

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10.   <u>Report History</u>

2011-03-16: Original Report
2011-04-06: Updated SAR values. Replaces previous report number.
2011-05-10: Updated SAR results to 10g SAR results, section 8.1, section 8.2. Replaces previous report number.