



SAR Test Report

FOR:

Manufacturer: Garmin International

Model Name: 01102436

FCC ID: IPH-01102436

IC ID: 1792A-01102436

Test Report #: SAR_GARMI_023_10001_FCC_rev1

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1. Assessment

The following is in compliance with the limits for general population uncontrolled exposure specified in FCC 2.1093. The device was tested according to measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C (Edition 01-01) and IEEE P1528/D1.2, April 21, 2003.

Company	Description	Model #
Garmin International	Connected Personal Navigation Device	01102436

Responsible for Testing Laboratory:

2010-06-29	Compliance	Marc Douat (Test Lab Manager)	
Date	Section	Name	Signature

Responsible for the Report:

2010-06-29	Compliance	Josie Sabado (Project Engineer)	
Date	Section	Name	Signature

The test results of this test report relate exclusively to the test item specified in Section 3.

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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Responsible Test Lab Manager:	Heiko Strehlow
Responsible Project Leader:	Josie Sabado

2.2. Identification of the Client

Applicant's Name:	Garmin International
Street Address:	1500 E 151 st Street
City/Zip Code	Olathe, KS 66062
Country	USA
Contact Person:	Van Ruggles
Phone No.	913.440.1321
Fax:	913.397.8282
e-mail:	Van.ruggles@garmin.com

2.3. Identification of the Manufacturer

Same as above client.

3. Equipment under Test (EUT)

3.1. Specification of the Equipment under Test

Product Type:	Portable
Marketing Name:	Nuvi 1695
Model No:	01102436
Hardware Revision :	3
Software Revision :	2.00
FCC-ID:	IPH-01102436
IC-ID :	1792A-01102436
Frequency Range:	GSM 850: 824.2-848.8 MHz EGSM 900: 880.2-914.8 MHz DCS 1800: 1710.2-1784.8 MHz PCS 1900: 1850.2-1909.8 MHz Bluetooth: 2400-2483.5 MHz
Type(s) of Modulation:	GMSK, 8PSK, GFSK, $\pi/4$ DQPSK, 8- DPSK
Antenna Type:	Integral

3.2. Identification of the Equipment Under Test (EUT)

EUT #	Serial Number	HW Version	SW Version
1	1YK000054	1.0	3.1

3.3. Identification of Accessory equipment

No accessory equipment

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 SARA2 described below.

The device is typically used as a vehicle mounted device, where it is attached to the windshield or dashboard of a vehicle. However, the device also supports portable use and thus SAR testing was performed as a "worst case" scenario to ensure that RF exposure requirements were fully met.

The Bluetooth radio is used to allow the device to act as a handsfree speakerphone for a separate customer owned mobile phone. External headsets are not supported.

Replaces report number SAR_GARMI_023_10001_FCC.

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:

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

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

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

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

4.4. SAR Limit

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

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

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

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

5. The FCC Measurement Procedure

The Federal Communications Commission (FCC) has published a report and order on the 1st of August 1996 [FCC 1996], which requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radiofrequency emissions [FCC 2001]. In March 2008 FCC released a document for 3G devices called SAR Measurement Procedures for 3G Devices. In April 2008 FCC released a document for laptop computers called SAR Evaluation Considerations for Laptop Computers with Antennas Built-in on Display Screens.

5.1. General Requirements

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

5.2. Body-worn and Other Configurations

Phantom Requirements

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

Test Position

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

Test to be Performed

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

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

5.3. Procedure for assessing the peak spatial-average SAR

Step 1: Power reference measurement:

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

Step 2: Area scan

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

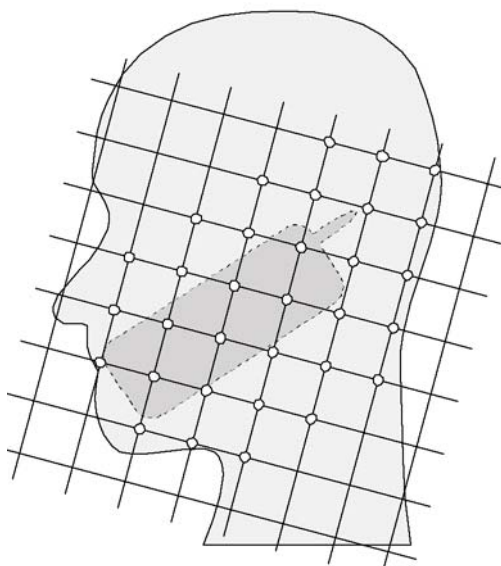


Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

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 $\pm 30^\circ$ (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced ($<30^\circ$).

Step 4: Power reference measurement

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

5.4. Determination of the largest peak spatial-average SAR

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

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

- 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., $N_c > 3$), then all frequencies, configurations and modes must be tested for all of the above positions.

Step 2: For the condition providing highest spatial peak SAR determined in Step 1 conduct all tests of 6.4 at all other test frequencies, e.g. lowest and highest frequencies. In addition, for all other conditions (device position, configuration and operational mode) where the spatial peak SAR value determined in Step 1 is within 3dB of the applicable SAR limit, it is recommended that all other test frequencies should be tested as well¹.

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

6. The Measurement System

6.1. Robot system specification

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

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

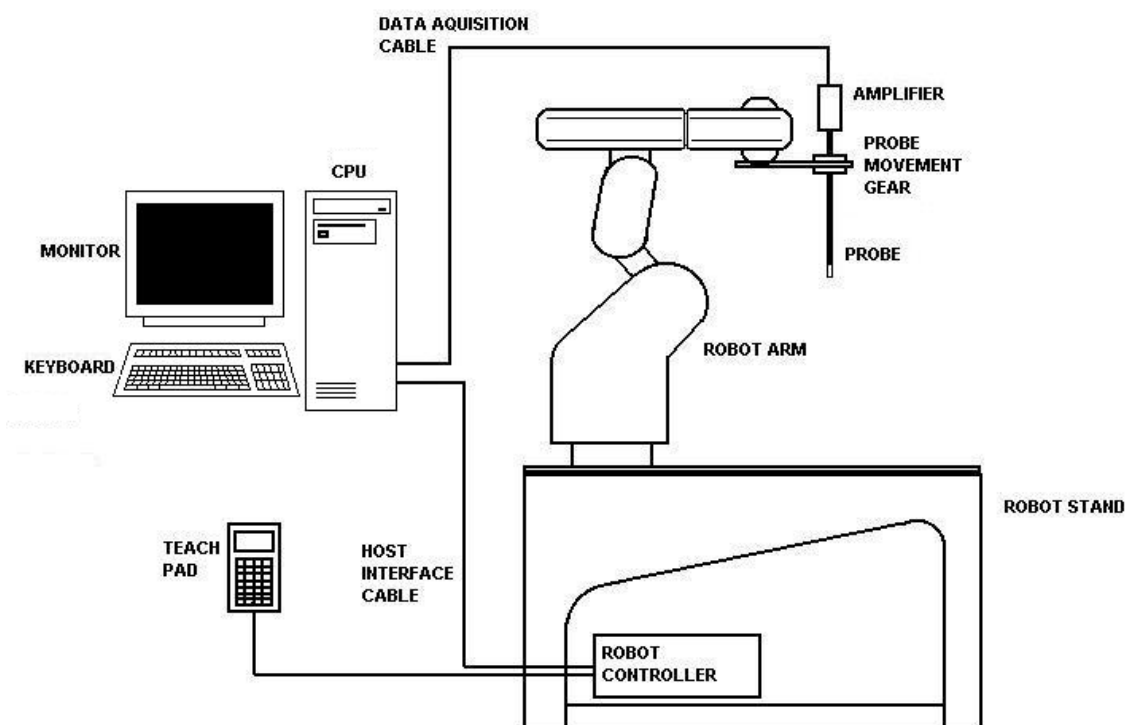


Figure 5: Schematic diagram of the SAR measurement system

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

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

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

6.2. Probe and amplifier specification

Indexsar isotropic immersible SAR probe

The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in the probe's calibration certificate (see appendix C.). The system uses diode compression potential (DCP) to determine SAR values for different types of modulation. Crest factor is not used for determining SAR values. The DCP for different types of modulation is determined during the probe calibration procedure. For a more detailed explanation see *IndexSAR Immesible SAR Probe Calibration Report* included in Appendix C of this report.

IXP-010 Amplifier

The amplifier unit has a multi-pole connector to connect to the probe and a multiplexer selects between the 3-channel single-ended inputs. A 16-bit AtoD converter with programmable gain is used along with an on-board micro-controller with non-volatile firmware. Battery life is around 150 hours and data are transferred to the PC via 3m of duplex optical fibre and a self-powered RS232 to optical converter.

6.3. Phantoms

The Specific Anthropomorphic Mannequin (SAM) Upright Phantom is fabricated using moulds generated from the CAD files as specified by CENELEC EN50361. It is mounted via a rotation base to a supporting table, which also holds the robotic positioner. The phantom and robot alignment is assured by both mechanical and laser registration systems. The box phantom used for body testing and for validation is manufactured from Perspex. The material is 2 mm in thickness on the test surfaces and 4 mm in thickness on the other surfaces. Its dimensions are: X=21 cm., Y=20.5 cm., Z=16 cm.

6.4. SAR measurement procedure



Figure 6: Principal components of the SAR measurement test bench

The major components of the test bench are shown in the picture above. A test set and dipole antenna control the handset via an air link and a low-mass phone holder can position the phone at either ear. Graduated scales are provided to set the phone in the 15 degree position. The upright phantom head holds approx. 7 litres of simulant liquid. The phantom is filled and emptied through a 45mm diameter penetration hole in the top of the head.

After an area scan has been done at a fixed distance of 8mm from the surface of the phantom on the source side, a 3D scan is set up around the location of the maximum spot SAR. First, a point within the scan area is visited by the probe and a SAR reading taken at the start of testing. At the end of testing, the probe is returned to the same point and a second reading is taken. Comparison between these start and end readings enables the power drift during measurement to be assessed.

6.5. SARA2 Interpolation and Extrapolation schemes

(See support document IXS-0202)

SARA2 software contains support for both 2D cubic B-spline interpolation as well as 3D cubic B-spline interpolation. In addition, for extrapolation purposes, a general n-th order polynomial fitting routine is implemented following a singular value decomposition algorithm presented in [4]. A 4th order polynomial fit is used by default for data extrapolation, but a linear-logarithmic fitting function can be selected as an option. The polynomial fitting procedures have been tested by comparing the fitting coefficients generated by the SARA2 procedures with those obtained using the polynomial fit functions of Microsoft Excel when applied to the same test input data.

6.6. Interpolation of 2D area scan

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

6.7. Extrapolation of 3D scan

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

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

6.8. Interpolation of 3D scan and volume averaging

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

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

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

as the step-size plus the minimum clearance distance (i.e with $x=5$ and a step size of 3.5, **dbe** will be between 3.5 and 8.5mm).

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

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

The phantom shell is made by an industrial moulding process from the CAD files of the SAM shape, with both internal and external moulds. For the upright phantoms, the external shape is subsequently digitized on a Mitutoyo CMM machine (Euro an ultrasonic sensor indicate that the shell thickness (**dph**) away from the ear is 2.0 +/- 0.1mm. The ultrasonic measurements were calibrated using additional mechanical measurements on available cut surfaces of the phantom shells. See support document IXS-020x.

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

7. Uncertainty Assessment

Measurement uncertainty values were evaluated for SAR measurements performed by Cetecom Inc. The uncertainty values for components specified in *FCC Supplement C (01-01) to OET Bulletin 65 (97-01)* were evaluated according to the procedures of *IEEE 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

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

8. Test results summary

8.1. Output Power

GPRS Uplink Timeslot Power 850 Band Channel 190			
Uplink Timeslots	Burst Pavg [dBm]	Burst Pavg [W]	Frame Pavg [W]
1	32.1	1.62	0.2027
2	32.1	1.62	0.4055

EGPRS Uplink Timeslot Power 850 Band Channel 190			
Uplink Timeslots	Burst Pavg [dBm]	Burst Pavg [W]	Frame Pavg [W]
1	27.7	0.59	0.0736
2	27.7	0.59	0.1472

GPRS Uplink Timeslot Power 1900 Band Channel 661			
Uplink Timeslots	Burst Pavg [dBm]	Burst Pavg [W]	Frame Pavg [W]
1	29.7	0.93	0.1167
2	29.7	0.93	0.2333

EGPRS Uplink Timeslot Power 1900 Band Channel 661			
Uplink Timeslots	Burst Pavg [dBm]	Burst Pavg [W]	Frame Pavg [W]
1	25.4	0.35	0.0433
2	25.4	0.35	0.0867

8.2. Duty Cycle Calculation Procedure

This duty cycle calculation procedure is authorized under KDB inquiry #480407. We have used 1000 instead of 1024 for bit conversion, which is more conservative.

This device employs infrequent short duration data communications and does not support GSM voice. The device will normally operate in either GPRS or EDGE mode, but for analysis purposes rather than separating and considering the modes separately, a more conservative analysis combining the two modes has been provided.

The device supports GPRS and EDGE Multislot Class 10. This allows a total of 5 timeslots but restricts the uplink to 1 or 2 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 MCS-1 through MCS-9). The slowest scheme is CS-1, which per 3GPP standards has a data rate of 9.05 kbits/s per timeslot. Therefore the slowest possible uplink data rate is 9.05 kbits/s with one timeslot. (two timeslots would yield 18.1kbits/s).

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

The device supports several user-initiated location-based service transactions, and also uses periodic background transactions to update other services and ensure up-to-date content is displayed to the user.

User Initiated Duty Cycle:

The user-initiated transactions include such items as flight status inquiries, weather information, and Google Local Search inquiries (which return business or personal address and contact information that can be used for navigation).

The largest possible user initiated query is a Google Local Search that uses the maximum allowable search string. The maximum theoretical uplink package size for this transaction is 338 bytes, which is equivalent to 2704 bits. At the slowest possible uplink speed of 9.05 kb/sec, the longest possible data transmission would take 0.299 seconds.

The smallest possible response to a user initiated query is a White Pages reverse phone lookup.

The minimum theoretical downlink package size for this transaction is 334 bytes, which is equivalent to 2672 bits. At the fastest supported downlink rate (MCS-9 with four timeslots with an overall 236.8 kbits/s), the minimum transmission time for the downlink package is 0.011 seconds.

High speed cameras were used to determine the minimum possible cycle time to re-initiate a user initiated query. Over 19 sample runs with an average of 1.32 seconds, a maximum of 1.385 seconds, a minimum of 1.231 seconds, and a standard deviation of 0.04 seconds, the minimum value of 1.231 seconds was used for the duty cycle calculation.

Assuming a continuous cycle of 0.299 seconds uplink, 0.011 seconds downlink, and a 1.231 second cycle time to restart the process, the duty cycle is $0.299 / (0.299 + 0.011 + 1.231) = 0.194$, or a 19.4% duty cycle.

Background Transaction Duty Cycle:

The device also employs independent background transactions for services such as traffic service reporting, position updates, advertising service updates, weather alerts and status (temperature), real-time safety camera features, and other similar location-based services that require information to be pushed to the device and user.

The background transactions happen once every 180 seconds (3 minutes) and address all queued background requests from the device.

Since the transaction data package size depends on the types and number of requests that are queued, the worst case upload package size was determined by summing the largest possible data packages size for each possible queued request. With the largest possible request from each possible background service, the maximum possible uplink file size is 6050 bytes, which is equivalent to 48400 bits. At the slowest possible uplink speed (CS-1 scheme with 1 timeslot resulting in a data rate of 9.05 kbits/s), the device would take 5.348 seconds to complete the upload of the data package.

The smallest possible background downlink transaction consists of only those transactions that occur during every background update (temperature, safetycameras, and waypoint push to unit).

The minimum possible downlink file size for background transactions is 270 bytes, which is equivalent to 2160 bytes. At the fastest possible downlink data rate (MCS-9 with four timeslots), the downlink would take 0.009 seconds.

The cycle time for the background transactions is 180 seconds between transaction initiation (thus the 180 seconds marks the start point of subsequent background transactions, not the time between transaction completion and the initiation of the next subsequent transaction).

Assuming a continuous cycle of 5.348 seconds uplink and 0.009 seconds downlink, repeated every 180 seconds the duty cycle is $5.348 / 180 = 0.0297 = 3\%$ duty cycle.

Adding the worst possible case duty cycles for continuous user initiated and background transactions yields a summed duty cycle of 22.4%

8.3. Test Positions and Configurations

SAR area scans are conducted with an 8mm separation distance between the probe sensor and the flat phantom.

Body positions were front and back of the EUT with a 0cm gap between the EUT and the flat phantom. See test setup photos in Appendix B.

SAR values are scaled using the duty cycle 22.4% calculated in section 8.2.

If the SAR value on the middle channel was more than 3dB below the limit, high and low channels were not evaluated.

The separation distance between the Bluetooth antenna and the GSM antenna is 6.01cm. Bluetooth average output power is 1.35mW (1.3dBm). Average output power is measured using the Rhode & Schwarz CBT. According to FCC KDB 447498, sections 1) b), test exclusion procedures given in KDB 648474 section 3 are used because output power is less than $60/f_{\text{(GHz)}}$. Bluetooth stand alone SAR evaluation is not required because the output power is less than 12mW ($\frac{1}{2} \cdot 60/f_{\text{(GHz)}}$) and the antenna separation distance is greater than 2.5cm. In addition, according to FCC KDB 447498, section 3) b) i), KDB 648474, section 4 excludes simultaneous transmission SAR evaluation because stand alone SAR evaluation is not required and the antenna separation distance is greater than 5cm.

8.4. SAR results

Position	Band	Channel	Frequency (MHz)	Uncorrected SAR 1g (W/kg)	Scaled SAR 1g (W/kg)	Area Scan (Appendix A)	Positioning Photo (Appendix B)
Front	GSM 850	MID # 190	836.6	0.88	0.197	Plot 1	Photo 1
Back	GSM 850	MID #190	836.6	1.161	0.260	Plot 2	Photo 2
Back	GSM 850	LOW #128	824.2	0.986	0.221	Plot 3	Photo 2
Back	GSM 850	HIGH #251	848.8	0.947	0.212	Plot 4	Photo 2
Front	PCS 1900	MID #661	1880	0.809	0.181	Plot 5	Photo 1
Back	PCS 1900	MID #661	1880	2.534	0.568	Plot 6	Photo 2
Back	PCS 1900	LOW #512	1850.2	2.668	0.598	Plot 7	Photo 2
Back	PCS 1900	HIGH #810	1909.8	3.353	0.751	Plot 8	Photo 2

8.5. 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 IndexSAR 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)	1g SAR (W/kg)	1 Watt reference SAR value (W/kg)	Difference reference SAR value to normalized SAR	Area scan (See Appendix A)
5-13-10	835	1	8.854	9.78	-9.47%	Plot 9
5-14-10	1880	1	37.935	40.35	-2.415%	Plot 10
5-18-10	1880	1	41.775	40.35	3.53%	Plot 11

9. References

1. [FCC 2001] Federal Communications Commission: Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01), FCC, 2001.
2. [IEEE 1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, Inst. of Electrical and Electronics Engineers, Inc., 1999.
3. [IEEE 200x] IEEE Std 1528-200x: DRAFT Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques. Draft 6.2, Inst. of Electrical and Electronics Engineers, Inc., 2000.
4. [NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results, Technical Note 1297 (TN1297), United States Department of Commerce Technology Administration, National Institute of Standards and Technology, 1994.
5. [FCC 2008] Federal Communications Commission, Office of Engineering and Technology: SAR Measurement Procedures for 802.11 a/b/g Transmitters, July 2008.
6. [FCC 2008] Federal Communications Commission, Office of Engineering and Technology: Mobile and Portable Device, RF Exposure, Equipment Authorization Procedures, December 2008.
7. [FCC 2008] Federal Communications Commission, Office of Engineering and Technology: SAR Measurement Procedures for 3G Devices, March 2008.

10. Report History

2010-06-23: Original Report

2010-06-29: Replaces previous report number. Updated section 8, area scan plots Appendix A, dipole calibration data Appendix C.