

# SAR TEST REPORT

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 SA950403L10

 MODEL NO.:
 F5D8011

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- **APPLICANT:** Belkin Corporation
  - ADDRESS: 501 West Walnut Avenue, Compton, CA 90220, U.S.A.
- **ISSUED BY:** Advance Data Technology Corporation
- LAB ADDRESS: 47 14<sup>th</sup> Lin, Chiapau Tsun, Linko, Taipei, Taiwan, R.O.C.
- **TEST LOCATION:** No. 19, Hwa Ya 2<sup>nd</sup> Rd., Kueishan, Taoyuan, Taiwan, R.O.C.

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# 1. CERTIFICATION

	FCC OET Bulletin 65, Supplement C (01-01)
STANDARDS:	FCC Part 2 (Section 2.1093), RSS-102
TEST SAMPLE:	ENGINEERING SAMPLE
TESTED :	Apr. 26, 2006
APPLICANT:	Belkin Corporation
BRAND:	Belkin
MODEL:	F5D8011
PRODUCT:	N1 Wireless Notebook Card

The above equipment have been tested by **Advance Data Technology Corporation**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's EMC characteristics under the conditions specified in this report.

PREPARED BY	: Rennie Wang	,DATE:_	Apr. 28, 2006
TECHNICAL ACCEPTANCE Responsible for RF	: Standy Hsu	, DATE:_	Apr. 28, 2006
APPROVED BY	: <u>Gray Char g</u> Gary Chang / Supervisor	,DATE:_	Apr. 28, 2006



# 2. GENERAL INFORMATION

### 2.1 GENERAL DESCRIPTION OF EUT

PRODUCT N1 Wireless Notebook Card		
MODEL NO.	F5D8011	
FCC ID	K7SF5D8011	
POWER SUPPLY	3.3Vdc from host equipment	
CLASSIFICATION	Portable device, production unit	
MODULATION TYPE	CCK, DQPSK, DBPSK for DSSS, 64QAM, 16QAM, QPSK, BPSK for OFDM	
RADIO TECHNOLOGY	DSSS, OFDM	
TRANSFER RATE	802.11b: 11.0/ 5.5/ 2.0/ 1.0Mbps 802.11g: 54.0/ 48.0/ 36.0/ 24.0/ 18.0/ 12.0/ 9.0/ 6.0Mbps Draft 802.11n (20MHz): 144.44/ 130.00/ 115.56/ 86.67/ 57.78/ 43.33/ 28.89/ 14.44/ 72.2/ 65.0/ 57.8/ 43.3/ 28.9/ 21.7/ 14.4/ 7.2Mbps Draft 802.11n (40MHz): 300.0/ 270.0/ 240.0/ 180.0/ 120.0/ 90.0/ 60.0/ 30.0/ 150.0/ 135.0/ 120.0/ 90.0/ 60.0/ 45.0/ 30.0/ 15.0Mbps	
FREQUENCY RANGE	2412MHz ~ 2462MHz	
NUMBER OF CHANNEL	11 for 802.11b, 802.11g, draft 802.11n (20MHz) 7 for draft 802.11n (40MHz)	
CHANNEL FREQUENCIES UNDER TEST AND ITS CONDUCTED OUTPUT POWER	802.11b: 127.654mW / Ch1: 2412MHz 160.707mW / Ch6: 2437MHz 127.362mW / Ch11: 2462MHz 802.11g: 101.751mW / Ch1: 2412MHz 202.783mW / Ch6: 2437MHz 101.282mW / Ch11: 2462MHz DRAFT 802.11n (20MHz) DUAL TX: 80.358mW / Ch1: 2412MHz 142.571mW / Ch6: 2437MHz 89.853mW / Ch11: 2462MHz DRAFT 802.11n (40MHz) DUAL TX: 56.760mW / Ch1: 2422MHz 103.522mW / Ch4: 2437MHz 57.284mW / Ch7: 2452MHz	



AVERAGE SAR (1g)	0.783W/kg	
	PIFA antenna with –0.5dBi gain Printed antenna with 0dBi gain (for receiver only)	
DATA CABLE	NA	
I/O PORTS	NA	

- 1. The EUT incorporates a MIMO function with 802.11b, 802.11g, draft 802.11n. Physically, the card provides three completed transmit and three receivers.
- 2. The EUT is 2 \* 3 spatial MIMO (2Tx & 3Rx) without beam forming function that only operate dual chain configuration (chain 0 and chain 1 transceivers are operational).
- 3. When the EUT operating in 802.11b, 802.11g, the software operation, which is defined by manufacturer, only set dual Tx.
- 1. When the EUT operating in draft 802.11n, the software operation, which is defined by manufacturer, only set 0 ~ 15 of "MCS" (MCS: Modulation and Coding Schemes) for triple Tx.
- 2. The EUT complies with draft 802.11n standards and backwards compatible with 802.11b, 802.11g products.
- 5. The EUT operates in the 2.4GHz frequency spectrum with throughput of up to 300Mbps.
- 6. The above EUT information was declared by manufacturer and for more detailed features description, please refer to the manufacturer's specifications or user's manual.



### 2.2 GENERAL DESCRIPTION OF APPLIED STANDARDS

According to the specifications of the manufacturer, this product must comply with the requirements of the following standards:

FCC Part 2 (2.1093) FCC OET Bulletin 65, Supplement C (01- 01) RSS-102 IEEE 1528-2003

All test items have been performed and recorded as per the above standards.



#### 2.3 GENERAL INOFRMATION OF THE SAR SYSTEM

DASY4 (software 4.6 Build 23) consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY4 software defined. The DASY4 software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.

#### **ET3DV6 ISOTROPIC E-FIELD PROBE**

CONSTRUCTION	Symmetrical design with triangular core. Built-in optical fiber for surface detection system. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., glycolether).
FREQUENCY	10MHz to 3GHz; Linearity: ± 0.2dB (30MHz to 3GHz)
DYNAMIC RANGE	5µW/g to > 100mW/g; Linearity: ± 0.2dB
OPTICAL SURFACE DETECTION	± 0.2mm repeatability in air and clear liquids over diffuse reflecting surfaces
DIMENSIONS	Overall length: 330mm (Tip Length: 16mm) Tip diameter: 6.8mm (Body diameter: 12mm) Distance from probe tip to dipole centers: 2.7mm
APPLICATION	General dosimetric measurements up to 3GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms (ET3DV6)

#### NOTE

- 1. The Probe parameters have been calibrated by the SPEAG. Please reference "APPENDIX D" for the Calibration Certification Report.
- 2. For frequencies above 800MHz, calibration in a rectangular wave-guide is used, because wave-guide size is manageable.
- 3. For frequencies below 800MHz, temperature transfer calibration is used because the wave-guide size becomes relatively large.



#### **TWIN SAM V4.0**

CONSTRUCTION	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528-2003, CENELEC 50361 and IEC 62209. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points with the robot.
SHELL THICKNESS	2 ± 0.2mm
FILLING VOLUME	Approx. 25liters
DIMENSIONS	Height: 810mm; Length: 1000mm; Width: 500mm
SYSTEM VALIDATION	KITS:

**CONSTRUCTION** Symmetrical dipole with I/4 balun enables measurement of feedpoint impedance with NWA matched for use near flat phantoms filled with brain simulating solutions. Includes distance holder and tripod adaptor

**CALIBRATION** Calibrated SAR value for specified position and input power at the flat phantom in brain simulating solutions

FREQUENCY 2450MHz

**RETURN LOSS** > 20dB at specified validation position

**POWER CAPABILITY** > 100W (f < 1GHz); > 40W (f > 1GHz)

**OPTIONS** Dipoles for other frequencies or solutions and other calibration conditions upon request



#### DEVICE HOLDER FOR SAM TWIN PHANTOM

#### CONSTRUCTION

The device holder for the mobile phone device 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 centers for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles. The holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\varepsilon$  =3 and loss tangent  $\delta$  =0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered. The device holder for the portable device makes up of the polyethylene foam. The dielectric parameters of material close to the dielectric parameters of the air.

#### DATA ACQUISITION ELECTRONICS

#### CONSTRUCTION

The data acquisition electronics (DAE3) consists of a highly sensitive electrometer grade preamplifier with auto-zeroing, a channel and gain-switching multiplex, 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 is 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 box is 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



#### 2.4 GENERAL DESCRIPTION OF THE SPATIAL PEAK SAR EVALUATION

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

Probe parameters:	- Sensitivity	Norm <sub>i</sub> , a <sub>i0</sub> , a <sub>i1</sub> , a <sub>i2</sub>
	- Conversion factor	ConvF <sub>i</sub>
	- Diode compression point	dcp <sub>i</sub>
Device parameters:	- Frequency	F
	- Crest factor	Cf
Media parameters:	- Conductivity	σ
	- Density	ρ

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. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \bullet \frac{cf}{dcp_i}$$

Vi	=compensated signal of channel i	(i = x, y, z)
U <sub>i</sub>	=input signal of channel I	(i = x, y, z)
Cf	=crest factor of exciting field	(DASY parameter)
dcpi	=diode compression point	(DASY parameter)



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

E-fieldprobes: 
$$E_i = \sqrt{\frac{V_1}{Norm_i \cdot ConvF}}$$

H-fieldprobes: 
$$H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

V <sub>i</sub>	=compensated signal of channel I	(i = x, y, z)
Norm <sub>i</sub>	<ul> <li>=sensor sensitivity of channel i μV/(V/m)2 for E- field Probes</li> </ul>	(i = x, y, z)
ConvF	= sensitivity enhancement in solution	
a <sub>ij</sub>	= sensor sensitivity factors for H-field probes	
F	= carrier frequency [GHz]	
Ei	= electric field strength of channel i in V/m	
H <sub>i</sub>	= 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.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

SAR	= local specific absorption rate in mW/g
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E<sub>tot</sub> = total field strength in V/m

 $\sigma$  = conductivity in [mho/m] or [Siemens/m]

ρ = equivalent tissue density in g/cm3

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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 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:

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

The probe is calibrated at the center of the dipole sensors that is located 1 to 2.7mm away from the probe tip. During measurements, the probe stops shortly above the phantom surface, depending on the probe and the surface detecting system. Both distances are included as parameters in the probe configuration file. The software always knows exactly how far away the measured point is from the surface. As the probe cannot directly measure at the surface, the values between the deepest measured point and the surface must be extrapolated. The angle between the probe axis and the surface normal line is less than 30 degree.

In the Area Scan, the gradient of the interpolation function is evaluated to find all the extreme of the SAR distribution. The uncertainty on the locations of the extreme is less than 1/20 of the grid size. Only local maximum within -2dB of the global maximum are searched and passed for the Cube Scan measurement. In the Cube Scan, the interpolation function is used to extrapolate the Peak SAR from the lowest measurement points to the inner phantom surface (the extrapolation distance). The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1g and 10g cubes, the extrapolation distance should not be larger than 5mm.



The maximum search is automatically performed after each area scan measurement. It is based on splines in two or three dimensions. The procedure can find the maximum for most SAR distributions even with relatively large grid spacing. After the area scanning measurement, the probe is automatically moved to a position at the interpolated maximum. The following scan can directly use this position for reference, e.g., for a finer resolution grid or the cube evaluations. The 1g and 10g peak evaluations are only available for the predefined cube 7 x 7 x 7 scans. The routines are verified and optimized for the grid dimensions used in these cube measurements. The measured volume of 30 x 30 x 30mm contains about 30g of tissue. The first procedure is an extrapolation (incl. boundary correction) to get the points between the lowest measured plane and the surface. The next step uses 3D interpolation to get all points within the measured volume in a 1mm grid (42875 points). In the last step, a 1g cube is placed numerically into the volume and its averaged SAR is calculated. This cube is the moved around until the highest averaged SAR is found. If the highest SAR is found at the edge of the measured volume, the system will issue a warning: higher SAR values might be found outside of the measured volume. In that case the cube measurement can be repeated, using the new interpolated maximum as the center.



# 3. DESCRIPTION OF SUPPORT UNITS

The EUT has been tested as an independent unit together with other necessary accessories or support units. The following support units or accessories were used to form a representative test configuration during the tests.

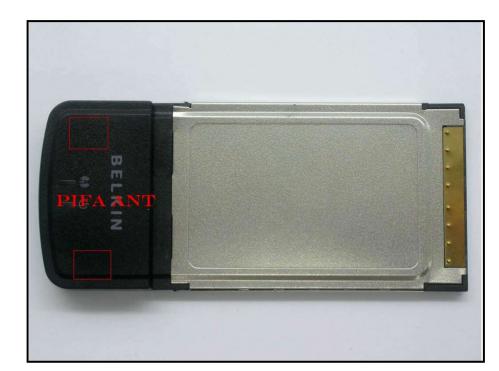
NO.	PRODUCT	BRAND	MODEL NO.	SERIAL NO.	FCC ID
1	NOTEBOOK	HP	N6000	CNU3480WP2	FCC DoC Approved
2	NOTEBOOK	Compaq	N800C	470048-515	FCC DoC Approved
3	NOTEBOOK	DELL	D600	CN-0G5152-48643- 49C-8221	FCC DoC Approved

NO.	SIGNAL CABLE DESCRIPTION OF THE ABOVE SUPPORT UNITS
1	ΝΑ
2	NA
3	NA

NOTE: All power cords of the above support units are non shielded (1.8m).



# 4. DESCRIPTION OF TEST MODES AND CONFIGURATIONS

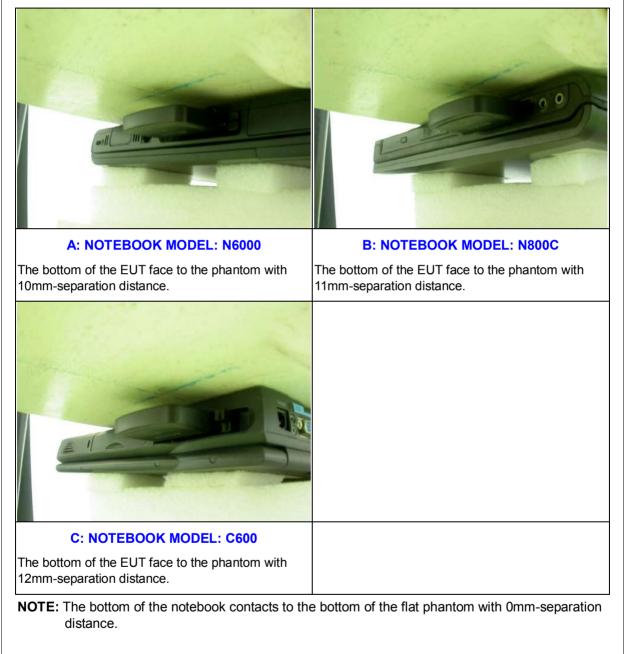


### 4.1. DESCRIPTION OF ANTENNA LOCATION



#### 4.2. DESCRIPTION OF ASSESSMENT POSITION

The following test configurations have been applied in this test report:





### 4.3. DESCRIPTION OF TEST MODE

ITEM	TEST MODE	ASSESSMENT POSTITION	TESTED CHANNEL	REMARK
1	802.11b	А	L, M, H	-
2	802.11g	А	L, M, H	-
3	Draft 802.11n (20MHz) Dual Tx	A	L, M, H	-
4	Draft 802.11n (40MHz) Dual Tx	A	L, M, H	-
5	802.11b	В	М	-
6	802.11g	В	М	-
7	Draft 802.11n (20MHz) Dual Tx	В	М	-
8	Draft 802.11n (40MHz) Dual Tx	В	М	-
9	802.11b	С	М	-
10	802.11g	С	М	-
11	Draft 802.11n (20MHz) Dual Tx	С	М	-
12	Draft 802.11n (40MHz) Dual Tx	С	М	-



### 4.4. SUMMARY OF TEST RESULTS

TEST MODE		802.11b		802.11g					
	MEASURED VALUE OF 1g SAR ( W/kg)								
CHANNEL	ASSESSMENT POSTITION			ASSESSMENT POSTITION					
	A B C		А	В	С				
LOW	0.591		-	0.279	-	-			
MIDDLE	0.783	<b>783</b> 0.621 0.565		0.628	0.521	0.435			
HIGH	0.574		-	0.307					

TEST MODE	DRAFT 80	2.11n (20MHz)	DUAL TX	DRAFT 802.11n (40MHz) DUAL TX					
	MEASURED VALUE OF 1g SAR ( W/kg)								
CHANNEL	ASSES	SSMENT POS	TITION	ASSESSMENT POSTITION					
	А	В	C A		В	С			
LOW	0.249	-	-	0.182					
MIDDLE	0.496	6 0.406 0.340		0.358	0.300	0.240			
HIGH	0.304	-	-	0.199	-	-			

 $\ensuremath{\textbf{NOTE:}}$  The worst value has been marked by boldface.



# 5. TEST RESULTS

### 5.1 TEST PROCEDURES

The EUT (N1 Wireless Notebook Card) plugged into the notebook. Use the software to control the EUT channel and transmission power. Then record the conducted power before the testing. Place the EUT to the specific test location. After the testing, must writing down the conducted power of the EUT into the report. The SAR value was calculated via the 3D spline interpolation algorithm that has been implemented in the software of DASY4 SAR measurement system manufactured and calibrated by SPEAG. According to the IEEE 1528 standards, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- Power reference measurement
- Verification of the power reference measurement
- Area scan
- Zoom scan
- Power reference measurement

The area scan was performed for the highest spatial SAR location. The zoom scan with 30mm x 30mm x 30mm volume was performed for SAR value averaged over 1g and 10g spatial volumes.



In the zoom scan, the distance between the measurement point at the probe sensor location (geometric center behind the probe tip) and the phantom surface is 4.0mm and maintained at a constant distance of  $\pm$ 1.0mm during a zoom scan to determine peak SAR locations. The distance is 4mm between the first measurement point and the bottom surface of the phantom. The secondary measurement point to the bottom surface of the phantom is with 9mm separation distance. The cube size is 7 x 7 x 7 points consist of 343 points and the grid space is 5mm.

The measurement time is 0.5s at each point of the zoom scan. The probe boundary effect compensation shall be applied during the SAR test. Because of the tip of the probe to the Phantom surface separated distances are longer than half a tip probe diameter.

In the area scan, the separation distance is 4mm between the each measurement point and the phantom surface. The scan size shall be included the transmission portion of the EUT. The measurement time is the same as the zoom scan. At last the reference power drift shall be less than  $\pm 5\%$ .



#### 5.2 MEASURED SAR RESULTS

	RONMENTA	L		Air Temperature:23.2°C, Liquid Temperature:22.1°C Humidity:63%RH								
TESTI	ED BY		Sam C	)nn			DATE	E	Ļ	Apr. 26, 2006		
CHAN	FREQ. (MHz)	TES		(m	ED POWER W)	POWER	DEVICE USE	TES	T MODE	MEASURED		
CHAN.		1E9	IMODE		AFTER TEST	DRIF	Т (%)	POWER		ITEM	1g SAR (W/kg)	
1	2412.0 (Low)	80	2.11b	127.654	126.467	-0.	93	Standard Battery		1	0.591	
6	2437.0 (Mid.)	80	2.11b	160.707	158.971	-1.	08	Standard Battery		1	0.783	
11	2462.0 (High)	80	2.11b	127.362	124.866	-1.	96	Standard Battery		1	0.574	
1	2412.0 (Low)	80	2.11g	101.751	99.797	-1.	92	Standard Battery		2	0.279	
6	2437.0 (Mid.)	80	2.11g	202.783	200.593	-1.	08	Standard Battery		2	0.628	
11	2462.0 (High)	80	2.11g	101.282	100.158	-1.	11	Standard Battery		2	0.307	

#### NOTE:

1. Test configuration of each mode is described in section 3.

2. In this testing, the limit for General Population Spatial Peak averaged over 1g, **1.6 W/kg**, is applied.

3. Please see the Appendix A for the data.



	RONMENTA DITION		Air Temperature:23.2°C, Liquid Temperature:22.1°C Humidity:63%RH									
TEST	ED BY		Sam C	Dnn			DATI	E		Apr. 26, 2006		
CHAN	FREQ. (MHz)	TEST		CONDUCTED POWER (mW)		POW		DEVICE USE	ΤE	ST MODE	MEASURED 1g SAR	
on An.		1201	MODE		AFTER TEST	DRIF	Г (%)	POWER		ITEM	(W/kg)	
1	2412.0 (Low)	802 (20	RAFT 2.11n MHz) AL TX	80.358	79.362	-1.:	24	Standard Battery		3	0.249	
6	2437.0 (Mid.)	802 (20	RAFT 2.11n MHz) AL TX	142.571	140.746	-1.:	28	Standard Battery		3	0.496	
11	2462.0 (High)	DRAFT 802.11n (20MHz) DUAL TX		89.853	88.622	-1.:	37	Standard Battery		3	0.304	
1	2422.0 (Low)	802 (40	RAFT 2.11n MHz) AL TX	56.760	56.033	-1.2	28	Standard Battery		4	0.182	
4	2437.0 (Mid.)	802 (40	RAFT 2.11n MHz) AL TX	103.522	101.628	-1.8	83	Standard Battery		4	0.358	
7	2452.0 (High)	802 (40	RAFT 2.11n MHz) AL TX	57.284	56.184	-1.9	92	Standard Battery		4	0.199	

1. Test configuration of each mode is described in section 3.

2. In this testing, the limit for General Population Spatial Peak averaged over 1g, **1.6 W/kg**, is applied.

3. Please see the Appendix A for the data.



	RONMENTA DITION	NL.	Air Temperature:23.2°C, Liquid Temperature:22.1°C Humidity:63%RH									
TEST	ED BY		Sam C	)nn			DATE	E		Apr. 26, 2006		
CHAN	FREQ. (MHz)	ITES.		(m	ED POWER W)	POWER		DEVICE USE		ST MODE	MEASURED	
onan.	1 TLE Q. (19112)	120	INODE		AFTER TEST	DRIF	Т (%)	POWER		ITEM	1g SAR (W/kg)	
6	2437.0 (Mid)	80	2.11b	160.707	160.128	-0.	36	Standard Battery		5	0.621	
6	2437.0 (Mid)	80	2.11g	202.783	201.019	-0.	87	Standard Battery		6	0.521	
6	2437.0 (Mid)	80 (20	RAFT 2.11n )MHz) AL TX	142.571	141.487	-0.	76	Standard Battery		7	0.406	
4	2437.0 (Mid)	80 (40	RAFT 2.11n )MHz) AL TX	103.522	102.621	-0.	87	Standard Battery		8	0.300	

1. Test configuration of each mode is described in section 3.

2. In this testing, the limit for General Population Spatial Peak averaged over 1g, **1.6 W/kg**, is applied.

3. Please see the Appendix A for the data.



	RONMENTA	<b>L</b>	Air Temperature:23.2°C, Liquid Temperature:22.1°C Humidity:63%RH									
TEST	ED BY		Sam C	)nn			DATI	E		Apr. 26, 2006		
CHAN	FREQ. (MHz)	TEST			ED POWER W)	DRIFT (%)		DEVICE USE	TE	ST MODE	MEASURED	
CHAN.		() TES	INODE	BEGIN TEST	AFTER TEST			POWER		ITEM	1g SAR (W/kg)	
6	2437.0 (Mid)	80	2.11b	160.707	159.164	-0.	96	Standard Battery		9	0.565	
6	2437.0 (Mid)	80	2.11g	202.783	201.505	-0.	63	Standard Battery		10	0.435	
6	2437.0 (Mid)	80 (20	RAFT 2.11n )MHz) AL TX	142.571	141.502	-0.	75	Standard Battery		11	0.340	
4	2437.0 (Mid)	80 (40	RAFT 2.11n )MHz) AL TX	103.522	102.331	-1.	15	Standard Battery		12	0.240	

1. Test configuration of each mode is described in section 3.

2. In this testing, the limit for General Population Spatial Peak averaged over 1g, 1.6 W/kg, is applied.

3. Please see the Appendix A for the data.



### 5.3 SAR LIMITS

	SAR (W/kg)						
HUMAN EXPOSURE	(GENERAL POPULATION / UNCONTROLLED EXPOSURE ENVIRONMENT)	(OCCUPATIONAL / CONTROLLED EXPOSURE ENVIRONMENT)					
Spatial Average (whole body)	0.08	0.4					
Spatial Peak (averaged over 1 g)	1.6	8.0					
Spatial Peak (hands / wrists / feet / ankles averaged over 10 g)	4.0	20.0					

#### NOTE:

1. This limits accord to 47 CFR 2.1093 – Safety Limit.

2. The EUT property been complied with the partial body exposure limit under the general population environment.



### 5.4 RECIPES FOR TISSUE SIMULATING LIQUIDS

For the measurement of the field distribution inside the SAM phantom, the phantom must be filled with 25 litters of tissue simulation liquid.

The following ingredients are used :

• WATER-	Deionized water (pure H20), resistivity _16 M - as basis for the liquid
• SUGAR-	Refined sugar in crystals, as available in food shops - to reduce relative permittivity
• SALT-	Pure NaCI - to increase conductivity
• CELLULOSE-	Hydroxyethyl-cellulose, medium viscosity (75-125mPa.s, 2% in water, 20_C),
	CAS # 54290 - to increase viscosity and to keep sugar in solution
PRESERVATIVE	<ul> <li>Preventol D-7 Bayer AG, D-51368 Leverkusen, CAS # 55965-84-9 - to prevent the spread of bacteria and molds</li> </ul>
• DGMBE-	Diethylenglycol-monobuthyl ether (DGMBE), Fluka Chemie GmbH, CAS # 112-34-5 - to reduce relative permittivity

#### THE RECIPES FOR 2450MHz SIMULATING LIQUID TABLE

INGREDIENT	HEAD SIMULATING LIQUID 2450MHz (HSL-2450)	MUSCLE SIMULATING LIQUID 2450MHz (MSL-2450)
Water	45%	69.83%
DGMBE	55%	30.17%
Salt	NA	NA
Dielectric Parameters at 22℃	f= 2450MHz ε= 39.2 ± 5% σ= 1.80 ± 5% S/m	f= 2450MHz ε= 52.7 ± 5% σ= 1.95 ± 5% S/m



Testing the liquids using the Agilent Network Analyzer E8358A and Agilent Dielectric Probe Kit 85070D. The testing procedure is following as

- 1. Turn Network Analyzer on and allow at least 30min. warm up.
- 2. Mount dielectric probe kit so that interconnecting cable to Network Analyzer will not be moved during measurements or calibration.
- 3. Pour de-ionized water and measure water temperature (±1°).
- 4. Set water temperature in Agilent-Software (Calibration Setup).
- 5. Perform calibration.
- 6. Validate calibration with dielectric material of known properties (e.g. polished ceramic slab with >8mm thickness  $\epsilon$ '=10.0,  $\epsilon$ "=0.0). If measured parameters do not fit within tolerance, repeat calibration (±0.2 for  $\epsilon$ ': ±0.1 for  $\epsilon$ ").
- 7. Conductivity can be calculated from  $\varepsilon$ " by  $\sigma = \omega \varepsilon_0 \varepsilon$ " = $\varepsilon$ " f [GHz] / 18.
- 8. Measure liquid shortly after calibration. Repeat calibration every hour.
- 9. Stir the liquid to be measured. Take a sample (~ 50ml) with a syringe from the center of the liquid container.
- 10. Pour the liquid into a small glass flask. Hold the syringe at the bottom of the flask to avoid air bubbles.
- 11. Put the dielectric probe in the glass flask. Check that there are no air bubbles in front of the opening in the dielectric probe kit.
- 12. Perform measurements.
- 13. Adjust medium parameters in DASY4 for the frequencies necessary for the measurements ('Setup Config', select medium (e.g. Brain 900MHz) and press 'Option'-button.
- 14. Select the current medium for the frequency of the validation (e.g. Setup Medium Brain 900MHz).



#### FOR 2.4GHz BAND SIMULATING LIQUID

LIQUID T	YPE	HSL	-2450	MSL	-2450				
SIMULAT TEMP.	ING LIQUID	Ν	IA	22.1					
TEST DA	TE	Ν	IA	Apr. 20	6, 2006				
TESTED	ВҮ	Ν	IA	Sam	Onn				
FREQ. LIQUID (MHz) PARAMETER		STANDARD VALUE	MEASUREMENT VALUE	STANDARD VALUE	MEASUREMENT VALUE				
2412.0		NA	NA	52.75	51.50				
2422.0		NA	NA	52.73	51.50				
2437.0	Permitivity	NA	NA	52.71	51.40				
2450.0	(ε)	NA	NA	52.70	51.40				
2452.0		NA	NA	52.69	51.40				
2462.0		NA	NA	52.68	51.30				
2412.0		NA	NA	1.913	1.950				
2422.0	Constructivity	NA	NA	1.923	1.960				
2437.0	Conductivity $(\sigma)$	NA	NA	1.937	1.980				
2450.0	(σ) S/m	NA	NA	1.950	2.000				
2452.0		NA	NA	1.952	2.010				
2462.0		NA	NA	1.967	2.020				
Dielectric Parameters Required at 22℃		ε= 39.	50MHz 2 ± 5% ± 5% S/m	f= 2450MHz ε= 52.7 ± 5% σ= 1.95 ± 5% S/m					

#### 5.5 TEST EQUIPMENT FOR TISSUE PROPERTY

ITEM	NAME	BAND	TYPE	SERIES NO.	CALIBRATED UNTIL
1	Network Analyzer	Agilent	E8358A	US41480539	May 05, 2006
2	Dielectric Probe	Agilent	85070D	US01440176	NA

#### NOTE:

1. Before starting, all test equipment shall be warmed up for 30min.

2. The tolerance (k=1) specified by Agilent for general dielectric measurements, deriving from inaccuracies in the calibration data, analyzer drift, and random errors, are usually ±2.5% and ±5% for measured permittivity and conductivity, respectively. However, the tolerances for the conductivity is smaller for material with large loss tangents, i.e., less than ±2.5% (k=1). It can be substantially smaller if more accurate methods are applied.



# 6. SYSTEM VALIDATION

The system validation was performed in the flat phantom with equipment listed in the following table. Since the SAR value is calculated from the measured electric field, dielectric constant and conductivity of the body tissue, and the SAR is proportional to the square of the electric field. So, the SAR value will be also proportional to the RF power input to the system validation dipole under the same test environment. In our system validation test, 250mW RF input power was used.

ITEM	NAME	BAND	TYPE	SERIES NO.	CALIBRATED UNTIL
1	SAM Phantom	S & P	QD000 P40 CA	PT-1150	NA
2	Signal Generator	Anritsu	68247B	984703	May 04, 2006
3	E-Field Probe	S & P	ET3DV6	1790	Dec. 19, 2006
4	DAE	S & P	DAE3 V1	510	Aug. 16, 2006
5	Robot Positioner	Staubli Unimation	NA	NA	NA
6	Validation Dipole	S & P	D2450V2	716	Aug. 22, 2006

### 6.1 TEST EQUIPMENT

NOTE: 1. Before starting the measurement, all test equipment shall be warmed up for 30min.

2. System validation was performed to check the condition during each test. According to this situation, calibrated period for the validation dipole back to the original factory is one year, and the others will be two.



### 6.2 TEST PROCEDURE

Before the system performance check, we need only to tell the system which components (probe, medium, and device) are used for the system performance check; the system will take care of all parameters. The dipole must be placed beneath the flat section of the SAM Twin Phantom with the correct distance holder in place. The distance holder should touch the phantom surface with a light pressure at the reference marking (little cross) and be oriented parallel to the long side of the phantom. Accurate positioning is not necessary, since the system will search for the peak SAR location, except that the dipole arms should be parallel to the surface. The device holder for mobile phones can be left in place but should be rotated away from the dipole.

- The "Power Reference Measurement" and "Power Drift Measurement" jobs are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the amplifier output power. If it is too high (above ±0.1 dB), the system performance check should be repeated; some amplifiers have very high drift during warm-up. A stable amplifier gives drift results in the DASY system below ±0.02dB.
- 2. The "Surface Check" job tests the optical surface detection system of the DASY system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above ±0.1mm). In that case it is better to abort the system performance check and stir the liquid. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe. (It does not depend on the surface reflectivity or the probe angle to the surface within ±30°.) However, varying breaking indices of difference varies from the actual setting, the probe parameter "optical surface



- 3. The "Area Scan" job measures the SAR above the dipole on a plane parallel to the surface. It is used to locate the approximate location of the peak SAR. The proposed scan uses large grid spacing for faster measurement; due to the symmetric field, the peak detection is reliable. If a finer graphic is desired, the grid spacing can be reduced. Grid spacing and orientation have no influence on the SAR result.
- 4. The "Zoom Scan" job measures the field in a volume around the peak SAR value assessed in the previous "Area Scan" job (for more information see the application note on SAR evaluation).

About the validation dipole positioning uncertainty, the constant and low loss dielectric spacer is used to establish the correct distance between the top surface of the dipole and the bottom surface of the phantom, the error component introduced by the uncertainty of the distance between the liquid (i.e., phantom shell) and the validation dipole in the DASY4 system is less than  $\pm 0.1$ mm.

$$SAR_{tolerance}[\%] = 100 \times (\frac{(a+d)^2}{a^2} - 1)$$

As the closest distance is 10mm, the resulting tolerance  $SAR_{tolerance}$ [%] is <2%.



### 6.3 VALIDATION RESULTS

SYSTEM VALIDATION TEST OF SIMULATING LIQUID									
FREQUENCY (MHz)	REQUIRED SAR (mW/g)	MEASURED SAR (mW/g)	DEVIATION (%)	SEPARATION DISTANCE	TESTED DATE				
MSL2450	13.60 (1g)	12.60	-7.35	10mm	Apr. 26, 2006				
TESTED BY	Sam Onn								

**NOTE:** Please see Appendix for the photo of system validation test.



### 6.4 SYSTEM VALIDATION UNCERTAINTIES

In the table below, the system validation uncertainty with respect to the analytically assessed SAR value of a dipole source as given in the IEEE 1528 standard is given. This uncertainty is smaller than the expected uncertainty for mobile phone measurements due to the simplified setup and the symmetric field distribution.

Error Description	Tolerance (±%)	Probability Distribution		(C <sub>i</sub> )		Standard Uncertainty (±%)		(v <sub>i</sub> )
	(= /0)			(1g)	(10g)	(1g)	(10g)	
		Measuremer	t System					
Probe Calibration	4.8	Normal	1	1	1	4.8	4.8	8
Axial Isotropy	4.7	Rectangular	√3	1	1	2.7	2.7	8
Hemispherical Isotropy	0	Rectangular	√3	1	1	0	0	8
Boundary effect	1.0	Rectangular	√3	1	1	0.6	0.6	8
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	8
System Detection Limit	1.0	Rectangular	√3	1	1	0.6	0.6	8
Readout Electronics	1.0	Normal	1	1	1	1.0	1.0	8
Response Time	0	Rectangular	√3	1	1	0	0	8
Integration Time	0	Rectangular	√3	1	1	0	0	8
<b>RF Ambient Conditions</b>	3.0	Rectangular	√3	1	1	1.7	1.7	8
Probe Positioner	0.4	Rectangular	√3	1	1	0.2	0.2	8
Probe positioning	2.9	Rectangular	√3	1	1	1.7	1.7	8
Algorithms for Max. SAR Evaluation	1.0	Rectangular	√3	1	1	0.6	0.6	8
		Dipo	le					
Dipole Axis to Liquid Distance	2.0	Rectangular	√3	1	1	1.2	1.2	8
Input power and SAR drift measurement	4.7	Rectangular	√3	1	1	2.7	2.7	$\infty$
		Phantom and Tiss	ue Paramete	ers				
Phantom Uncertainty	4.0	Rectangular	√3	1	1	2.3	2.3	$\infty$
Liquid Conductivity (target)	5.0	Rectangular	√3	0.64	0.43	1.8	1.2	$\infty$
Liquid Conductivity (measurement)	2.5	Normal	1	0.64	0.43	1.6	1.1	8
Liquid Permittivity (target)	5.0	Rectangular	√3	0.6	0.49	1.7	1.4	8
Liquid Permittivity (measurement)	2.5	Normal	1	0.6	0.49	1.5	1.2	8
	Combined S	Standard Uncertain	ty			8.4	8.1	8
Coverage Factor for 95%							kp=2	
Expanded Uncertainty (K=2)							16.2	



# 7. MEASUREMENT SAR PROCEDURE UNCERTAINTIES

The assessment of spatial peak SAR of the hand handheld devices is according to IEEE 1528. All testing situation shall be met below these requirements.

- The system is used by an experienced engineer who follows the manual and the guidelines taught during the training provided by SPEAG.
- The probe has been calibrated within the requested period and the stated uncertainty for the relevant frequency bands does not exceed 4.8% (k=1).
- The validation dipole has been calibrated within the requested period and the system performance check has been successful.
- The DAE unit has been calibrated within the within the requested period.
- The minimum distance between the probe sensor and inner phantom shell is selected to be between 4 and 5mm.
- The operational mode of the DUT is CW, CDMA, FDMA or TDMA (GSM, DCS, PCS, IS136 and PDC) and the measurement/integration time per point is >500 ms.
- The dielectric parameters of the liquid have been assessed using Agilent 85070D dielectric probe kit or a more accurate method.
- The dielectric parameters are within 5% of the target values.
- The DUT has been positioned as described in section 3.

#### 7.1. PROBE CALIBRATION UNCERTAINTY

SPEAG conducts the probe calibration in compliance with international and national standards (e.g. IEEE 1528, EN50361, IEC 62209, etc.) under ISO17025. The uncertainties are stated on the calibration certificate. For the most relevant frequency bands, these values do not exceed 4.8% (k=1). If evaluations of other bands are performed for which the uncertainty exceeds these values, the uncertainty tables given in the summary have to be revised accordingly.



### 7.2. ISOTROPY UNCERTAINTY

The axial isotropy tolerance accounts for probe rotation around its axis while the hemispherical isotropy error includes all probe orientations and field polarizations. These parameters are assessed by SPEAG during initial calibration. In 2001, SPEAG further tightened its quality controls and warrants that the maximal deviation from axial isotropy is  $\pm 0.20$ dB, while the maximum deviation of hemispherical isotropy is  $\pm 0.40$ dB, corresponding to  $\pm 4.7\%$  and  $\pm 9.6\%$ , respectively. A weighting factor of cp equal to 0.5 can be applied, since the axis of the probe deviates less than 30 degrees from the normal surface orientation.

#### 7.3. BOUNDARY EFFECT UNCERTAINTY

The effect can be estimated according to the following error approximation formula

$$SAR_{tolerance}[\%] = SAR_{be}[\%] \times \frac{(d_{be} + d_{step})^2}{2d_{step}} \frac{e^{-\frac{d_{be}}{\delta/2}}}{\delta/2}$$

$$d_{be} + d_{step} < 10mm$$

The parameter d<sub>be</sub> is the distance in mm between the surface and the closest measurement point used in the averaging process; d<sub>step</sub> is the separation distance in mm between the first and second measurement points;  $\delta$  is the minimum penetration depth in mm within the head tissue equivalent liquids (i.e.,  $\delta$ = 13.95mm at 3GHz); SAR<sub>be</sub> is the deviation between the measured SAR value at the distance d<sub>be</sub> from the boundary and the wave-guide analytical value SAR<sub>ref</sub>.DASY4 applies a boundary effect compensation algorithm according to IEEE 1528, which is possible since the axis of the probe never deviates more than 30 degrees from the normal surface orientation. SAR<sub>be</sub>[%] is assessed during the calibration process and SPEAG warrants that the uncertainty at distances larger than 4mm is always less than 1%.In summary, the worst case boundary effect SAR tolerance[%] for scanning distances larger than 4mm is < ± 0.8%.



### 7.4. PROBE LINEARITY UNCERTAINTY

Field probe linearity uncertainty includes errors from the assessment and compensation of the diode compression effects for CW and pulsed signals with known duty cycles. This error is assessed using the procedure described in IEEE 1528. For SPEAG field probes, the measured difference between CW and pulsed signals, with pulse frequencies between 10Hz and 1kHz and duty cycles between 1 and 100, is <  $\pm 0.20$ dB (<  $\pm 4.7$ %).

### 7.5. READOUT ELECTRONICS UNCERTAINTY

All uncertainties related to the probe readout electronics (DAE unit), including the gain and linearity of the instrumentation amplifier, its loading effect on the probe, and accuracy of the signal conversion algorithm, have been assessed accordingly to IEEE 1528. The combination (root-sum-square RSS method) of these components results in an overall maximum error of  $\pm 1.0\%$ .

#### 7.6. RESPONSE TIME UNCERTAINTY

The time response of the field probes is assessed by exposing the probe to a wellcontrolled electric field producing SAR larger than 2.0W/kg at the tissue medium surface. The signal response time is evaluated as the time required by the system to reach 90% of the expected final value after an on/of switch of the power source. Analytically, it can be expressed as:

$$SAR_{tolerance}[\%] = 100 \times (\frac{T_m}{T_m + \tau e^{-T_m/\tau} - \tau} - 1)$$

where Tm is 500 ms, i.e., the time between measurement samples, and  $_{T}$  the time constant. The response time  $_{T}$  of SPEAG's probes is <5ms. In the current implementation, DASY4 waits longer than 100 ms after having reached the grid point before starting a measurement, i.e., the response time uncertainty is negligible.



### 7.7. INTEGRATION TIME UNCERTAINTY

If the device under test does not emit a CW signal, the integration time applied to measure the electric field at a specific point may introduce additional uncertainties due to the discretization and can be assessed as follows

$$SAR_{tolerance}[\%] = 100 \times \sum_{allsub-frames} \frac{t_{frame}}{t_{int egration}} \frac{slot_{idle}}{slot_{total}}$$

The tolerances for the different systems are given in Table 7.1, whereby the worst-case  $SAR_{tolerance}$  is 2.6%.

System	SAR <sub>tolerance</sub> %
CW	0
CDMA*	0
WCDMA*	0
FDMA	0
IS-136	2.6
PDC	2.6
GSM/DCS/PCS	1.7
DECT	1.9
Worst-Case	2.6

**TABLE 7.1** 



#### 7.8. PROBE POSITIONER MECHANICAL TOLERANCE

The mechanical tolerance of the field probe positioner can introduce probe positioning uncertainties. The resulting SAR uncertainty is assessed by comparing the SAR obtained according to the specifications of the probe positioner with respect to the actual position defined by the geometric enter of the probe sensors. The tolerance is determined as:

$$SAR_{tolerance}[\%] = 100 \times \frac{d_{ph}}{\delta/2}$$

The specified repeatability of the RX robot family used in DASY4 systems is  $\pm 25 \mu$ m. The absolute accuracy for short distance movements is better than  $\pm 0.1$ mm, i.e., the SAR<sub>tolerance</sub>[%] is better than 1.5% (rectangular).

#### 7.9. PROBE POSITIONING

The probe positioning procedures affect the tolerance of the separation distance between the probe tip and the phantom surface as:

$$SAR_{tolerance}[\%] = 100 \times \frac{d_{ph}}{\delta/2}$$

where  $d_{ph}$  is the maximum deviation of the distance between the probe tip and the phantom surface. The optical surface detection has a precision of better than 0.2mm, resulting in an SAR<sub>tolerance</sub>[%] of <2.9% (rectangular distribution). Since the mechanical detection provides better accuracy, 2.9% is a worst-case figure for DASY4 system.



#### 7.10. PHANTOM UNCERTAINTY

The SAR measurement uncertainty due to SPEAG phantom shell production tolerances has been evaluated using

$$SAR_{tolerance}[\%] \cong 100 \times \frac{2d}{a}, \qquad d << a$$

For a maximum deviation d of the inner and outer shell of the phantom from that specified in the CAD file of  $\pm 0.2$ mm, and a 10mm spacing a between source and tissue liquid, the calculated phantom uncertainty is  $\pm 4.0\%$ .



#### 7.11. DASY4 UNCERTAINTY BUDGET

Error Description	Tolerance (±%)	Probability Distribution	Divisor	(0	-	Uncer (±	dard rtainty %)	(v <sub>i</sub> )
Measurement Eq			- 	(1g)	(10g)	(1g)	(10g)	
Probe Calibration	4.8	Normal	1	1	1	4.8	4.8	$\infty$
Axial Isotropy	4.7	Rectangular	√3	1	1	1.9	1.9	$\infty$
Hemispherical Isotropy	9.6	Rectangular	√ 3	1	1	3.9	3.9	$\infty$
Boundary effect	1.0	Rectangular	√3	1	1	0.6	0.6	$\infty$
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	$\infty$
System Detection Limit	1.0	Rectangular	√3	1	1	0.6	0.6	$\infty$
Readout Electronics	1.0	Normal	1	1	1	1.0	1.0	$\infty$
Response Time	0.8	Normal	1	1	1	0.8	0.8	$\infty$
Integration Time	2.6	Normal	1	1	1	2.6	2.6	$\infty$
Noise	0.0	Normal	1	0	0	0	0	$\infty$
Mechanical Constraints								
Scanning System	0.4	Rectangular	√3	1	1	0.2	0.2	$\infty$
Phantom Shell	4.0	Rectangular	√3	1	1	2.3	2.3	$\infty$
Probe Positioning	2.9	Rectangular	√3	1	1	1.7	1.7	$\infty$
Device Positioning	2.9	Normal	1	1	1	2.9	2.9	875
		Physical Par	ameters					
Liquid Conductivity (target)	5.0	Rectangular	√3	0.7	0.5	2	1.4	8
Liquid Conductivity (measurement)	4.3	Rectangular	√3	0.7	0.5	1.7	1.2	$\infty$
Liquid Permittivity (target)	5.0	Rectangular	√3	0.6	0.5	1.7	1.4	$\infty$
Liquid Permittivity (measurement)	4.3	Rectangular	√3	0.6	0.5	1.5	1.2	~
Power Drift	5	Rectangular	√3	1	1	2.9	2.9	$\infty$
<b>RF Ambient Conditions</b>	3.0	Rectangular	√3	1	1	1.7	1.7	$\infty$
Post-Processing								
Extrapolation and Integration	1	Rectangular	√3	1	1	0.6	0.6	$\infty$
	Combined Standard Uncertainty						9.7	
Coverage Factor for 95%							kp=2	]
Expanded Uncertainty (K=2)							19.3	

#### **TABLE 7.2**

The table 7.2: Worst-Case uncertainty budget for DASY4 assessed according to IEEE 1528. The budget is valid for the frequency range 300MHz ~ 3GHz and represents a worst-case analysis. For specific tests and configurations, the uncertainty could be considerable smaller.



# 8. INFORMATION ON THE TESTING LABORATORIES

We, ADT Corp., were founded in 1988 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved by the following approval agencies according to ISO/IEC 17025.

USA	FCC, UL, A2LA
GERMANY	TUV Rheinland
JAPAN	VCCI
NORWAY	NEMKO
CANADA	INDUSTRY CANADA, CSA
R.O.C.	CNLA, BSMI, DGT
NETHERLANDS	Telefication
SINGAPORE	PSB , GOST-ASIA (MOU)
RUSSIA	CERTIS (MOU)

Copies of accreditation certificates of our laboratories obtained from approval agencies can be downloaded from our web site:

www.adt.com.tw/index.5/phtml. If you have any comments, please feel free to contact us at the following:

#### Linko EMC/RF Lab:

Tel: 886-2-26052180 Fax: 886-2-26052943 Hsin Chu EMC/RF Lab:

Tel: 886-3-5935343 Fax: 886-3-5935342

Hwa Ya EMC/RF/Safety/Telecom Lab:	Linko RF Lab.
Tel: 886-3-3183232	Tel: 886-3-3270910
Fax: 886-3-3185050	Fax: 886-3-3270892

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The address and road map of all our labs can be found in our web site also.