

SAR Evaluation Report

in accordance with the requirements of FCC Report and Order: ET Docket 93-62, and OET Bulletin 65 Supplement C

for

802.11b Wireless LAN USB Dongle

MODEL: XI-735

FCC ID: M4Y-00735

February 26, 2003

REPORT NO: 02T1744-1B

Prepared for

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CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

Dates of Tests: February 26, 2003

Report No: 02T1744-1B

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC OET 65 Supplement C (released on 6/29/2001 see Test Report).

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Steve Cheng EMC Engineering Manager

TABLE OF CONTENT

1. EUT DESCRIPTION

- *¹ Specific Absorption Rate (SAR) is a measure of the rate of energy absorption due to exposure to an RF transmitting source (wireless portable device).*
- **²** *IEEE/ANSI Std. C95.1-1992 limits are used to determine compliance with FCC ET Docket 93-62.*

2. REQUIREMENTS FOR COMPLIANCE TESTING DEFINED BY THE FCC

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996 [1]. The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g for an uncontrolled environment and 8.0 mW/g for an occupational/controlled environment as recommended by the ANSI/IEEE standard C95.1-1992 [6]. According to the Supplement C of OET Bulletin 65 "Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

3. DOSIMETRIC ASSESSMENT SYSTEM

These measurements were performed with the automated near-field scanning system DASY4 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9 m) which positions the probes with a positional repeatability of better than \pm 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The SAR measurements were conducted with the dosimetric probe ET3DV6 SN: 1577 (manufactured by SPEAG), designed in the classical triangular configuration [3] and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure described in [7] with accuracy of better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure described in $[8]$ and found to be better than ± 0.25 dB. The phantom used was the SAM Twin Phantom as described in FCC supplement C, IEEE P1528 and EN50361.

The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

3.1. MEASUREMENT SYSTEM DIAGRAM

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

- 1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software.
- 2. An arm extension for accommodating the data acquisition electronics (DAE).
- 3. A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- 4. A data acquisition electronic (DAE), which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- 5. A unit to operate the optical surface detector, which is connected to the EOC.
- 6. The Electro-optical coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the PC plug-in card.
- 7. The functions of the PC plug-in card based on a DSP is to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
- 8. A computer operating Windows 95 or larger
- 9. DASY4 software
- 10. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
- 11. The SAM phantom enabling testing left-hand and right-hand usage.
- 12. The device holder for handheld EUT.
- 13. Tissue simulating liquid mixed according to the given recipes (see Application Note).
- 14. System validation dipoles to validate the proper functioning of the system.

3.2. SYSTEM COMPONENTS

ET3DV6 Probe Specification

Construction Symmetrical design with triangular core Built-in optical fiber for surface detection System Built-in shielding against static charges Calibration In air from 10 MHz to 2.5 GHz In brain and muscle simulating tissue at Frequencies of 450 MHz, 900 MHz and 1.8 GHz (accuracy \pm 8%) Frequency 10 MHz to > 6 GHz; Linearity: \pm 0.2 dB (30 MHz to 3 GHz) Directivity \pm 0.2 dB in brain tissue (rotation around probe axis) \pm 0.4 dB in brain tissue (rotation normal probe axis) Dynamic 5 mW/g to > 100 mW/g; Range Linearity: \pm 0.2 dB Surface \pm 0.2 mm repeatability in air and clear liquids Detection over diffuse reflecting surfaces. Dimensions Overall length: 330 mm Tip length: 16 mm Body diameter: 12 mm Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm Application General dosimetric up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms

Photograph of the probe

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

Inside view of ET3DV6 E-field Probe

E-Field Probe Calibration Process

Each probe is calibrated according to a dosimetric assessment procedure described in [6] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [7] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies bellow 1 GHz, and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

SAM Phantom

The SAM Phantom V4.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN50361. The phantom 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 the 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 in the robot.

Shell Thickness: 2 ± 0.2 mm Filling Volume: Approx. 25 liters Dimensions (H x L x W): 810 x 1000 x 500 mm

SAM Phantom

Device Holder for Transmitters

In combination with the Generic Twin Phantom V3.0, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produced infinite number of configurations [10]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests. **Device Holder**

4. EVALUATION PROCEDURE

Data Evaluation

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

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

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

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

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

E-field probes:

$$
E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}
$$

H-field probes:

$$
H_{i} = \sqrt{Vi} \cdot \frac{a_{i10} + a_{i11}f + a_{i12}f^{2}}{f}
$$

with V_i = Compensated signal of channel i $(i = x, y, z)$

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

μV/(V/m) 2 for E0field Probes

ConvF = Sensitivity enhancement in solution

aij = Sensor sensitivity factors for H-field probes

 $f =$ Carrier frequency (GHz)

- $Ei =$ Electric field strength of channel i in V/m
- $Hi = Magnetic$ field strength of channel i in A/m

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

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

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

$$
SAR = E_{\text{tot}}^2 \cdot \frac{\mathbf{S}}{\mathbf{r} \cdot 1000}
$$

with SAR = local specific absorption rate in mW/g

 E_{tot} = total field strength in V/m

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

 $r =$ equivalent tissue density in g/cm³

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

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

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

with P_{pwe} = Equivalent power density of a plane wave in mW/cm²

 E_{tot} = total electric field strength in V/m

 H_{tot} = total magnetic field strength in A/m

SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the central position was used as a reference value for assessing the power drop.

Step 2: The SAR distribution at the exposed side of the body was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the EUT and the horizontal grid spacing was 10 mm x 10 mm. Based on the data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

- 1. The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2 mm. The extrapolation was based on a least square algorithm [11]. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
- 2. The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one-dimensional splines with the "Not a knot"-condition (in x, y and z-directions) [11], [12]. The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
- 3. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

5. MEASUREMENT UNCERTAINTY

Uncertainty Budget per IEEE P1528

Note: Due to the different spec for liquid above 2G (+/- 10%) and below the 2G (+/- 5%), the uncertainty budget is different accordingly.

6. EXPOSURE LIMIT

(A). Limits for Occupational/Controlled Exposure (W/kg)

(B). Limits for General Population/Uncontrolled Exposure (W/kg)

NOTE: *Whole-Body SAR* is averaged over the entire body, *partial-body SAR* is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. *SAR for hands, wrists, feet and ankles* is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

Population/Uncontrolled Environments: are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

Occupational/Controlled Environments: are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure, (i.e. as a result of employment or occupation).

7. MEASUREMENT RESULTS

7.1. SYSTEM VALIDATION

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of ±10%. The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

Frequency (MHz)	1 g SAR	10 g SAR	Local SAR at surface (Above feed point)	Local SAR at surface $(y=2cm$ offset from feed point)	
300	3.0	2.0	4.4	2.1	
450	4.9	3.3	7.2	3.2	
835	9.5	6.2	14.1	4.9	
900	10.8	6.9	16.4	5.4	
1450	29.0	16.0	50.2	6.5	
1800	38.1	19.8	69.5	6.8	
1900	39.7	20.5	72.1	6.6	
2000	41.1	21.1	74.6	6.5	
2450	52.4	24.0	104.2	7.7	
3000	63.8	25.7	140.2	9.5	

IEEE P1528 Recommended Reference Value

System Validation Results

Ambient conduction: Temperature: 24.5°C; Relative humidity: 34%

System Validation Dipole: D2450V2 SN: 706 Date: February 26, 2003

7.2. TEST LIQUID CONFIRMATION

Simulated Tissue Liquid Parameter confirmation

The dielectric parameters were checked prior to assessment using the HP85070C dielectric probe kit. The dielectric parameters measured are reported in each correspondent section.

IEEE SCC-34/SC-2 P1528 recommended Tissue Dielectric Parameters

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations and extrapolated according to the head parameters specified in P1528

 $(\varepsilon_r$ = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

Liquid Confirmation Results

Ambient conduction – Temperature: 24.5°C; Relative humidity: 34% **Date**: February 26, 2003

Medium		Parameters	Target	Measured	Deviation ^[%]	Limited ^[%]
Type	Temp. $[°C]$					
Muscle	22.50	Permitivity:	52.7	50.49	-4.19	±10
2450 MHz		Conductivity:	1.95	1.9954	2.33	± 5

7.3. EUT TUNE-UP PROCEDURE

The following procedures had been used to prepare the EUT for the SAR test.

- o The client supplied a special driving program (Prism Test Utility) to program the EUT to continually transmit the specified maximum power. And also to change the channel frequency.
- o The conducted power was measured at the high, middle and low channel frequency before and after the SAR measurement.

7.4. EUT SETUP PHOTOS

EUT Set-up Configuration 1

- 1. Installation conditions between host device and phantom Host device perpendicular to flat phantom
- 2. Spacing between EUT and phantom 1.5 cm
- 3. EUT location in the card slot lower slot

EUT Set-up Configuration 2

- 1. Installation conditions between host device and phantom Botton face in parallel with flat phantom.
- 2. Spacing between host device and phantom In contact (0 cm).
- 3. Spacing between EUT and phantom 0.7 cm.

7.5. SAR MEASUREMENT RESULTS

Measured date: February 26, 2003

8. EUT PHOTOS

BANTHO MIHO $\sqrt{100}$ EUTKr.735 Squitt

Laptop PC: Toshiba, model name: PS183U-00KP0X, Serial Number: 91617937PU

9. EQUIPMENTS LIST & CALIBRATION STATUS

10. REFERENCES

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11. ATTACHMENTS

End of Report