# SAR EVALUATION REPORT

For

# **AMBIT Microsystems Corporation**

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FCC ID: MCLT60H6773

2003-09-09

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#### TABLE OF CONTENTS

SUMMARY	3
1 - REFERENCE	4
2 - TESTING EQUIPMENT	5
2.1 EQUIPMENTS LIST & CALIBRATION INFO	
2.2 EQUIPMENT CALIBRATION CERTIFICATE	
3 - EUT SUMMARY	12
4 - SYSTEM TEST CONFIGURATION	13
4.1 JUSTIFICATION	
4.2 EUT Exercise Software and Procedure	
4.3 SPECIAL ACCESSORIES	
4.4 Equipment Modifications	
5 - CONDUCTED OUTPUT POWER MEASUREMENT	
5.1 MEASUREMENT PROCEDURE	
5.2 TEST RESULTS	
6 - DOSIMETRIC ASSESSMENT SETUP	
6.1 MEASUREMENT SYSTEM DIAGRAM	
6.2 SYSTEM COMPONENTS	
7 - SYSTEM EVALUATION	
7.1 SIMULATED TISSUE LIQUID PARAMETER CONFIRMATION	
7.2 EVALUATION PROCEDURES	
7.3 SYSTEM ACCURACY VERIFICATION	24
7.4 SAR EVALUATION PROCEDURE	
7.5 EXPOSURE LIMITS	
8 - TEST RESULTS	
8.1 SAR BODY-WORN TEST DATA	
8.2 PLOTS OF TEST RESULT	
EXHIBIT A - SAR SETUP PHOTOGRAPHS	35
BACK TOUCHING FLAT PHANTOM – ANTENNA AT RIGHT	
BACK TOUCHING FLAT PHANTOM – ANTENNA AT LEFT	
EXHIBIT B - EUT PHOTOGRAPHS	
NOTEBOOK TOP VIEW	
NOTEBOOK FRONT VIEW	
LAPTOP REAR VIEWLAPTOP BOTTOM VIEW	
ANTENNA LOCATION 1	
Antenna Location 2	
EUT – TOP VIEW	39
EUT – Cover Removed View	
EUT – SOLDER VIEW	
ANTENNA VIEWAC POWER ADAPTER VIEW	
EXHIBIT C – Z-AXIS	42

#### **SUMMARY**

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 as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). 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.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in North America is 1.6 mW/g average over 1 gram of tissue mass.

The test configurations were laid out on a specially designed test fixture to ensure the reproducibility of measurements. Each configuration was scanned for SAR. Analysis of each scan was carried out to characterize the above effects in the device.

The investigation was limited to the worst-case scenario from the device usage point of view. For the clarity of data analysis, and clarity of presentation, only one tissue simulation was used for the head and body simulation. This means that if SAR was found at the headset position, the magnitude of SAR would be overestimated comparing to SAR to a headset placed in the ear region.

There was no SAR of any concern measured on the device for any of the investigated configurations.

#### 1 - REFERENCE

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- [4] Niels Kuster, Ralph K.astle, and Thomas Schmid, \Dosimetric evaluation of mobile communications equipment with known precision", IEICE Transactions on Communications, vol. E80-B, no. 5, pp. 645 (652, May 1997.
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- [7] Katja Pokovic, Thomas Schmid, and Niels Kuster, \Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies", in ICECOM \_ 97, Dubrovnik, October 15{17, 1997, pp. 120-24.
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- [13] NIS81 NAMAS, \The treatment of uncertainty in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddington, Middlesex, England, 1994.
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# 2 - TESTING EQUIPMENT

# 2.1 Equipments List & Calibration Info

Type / Model	Cal. Date	S/N:
DASY3 Professional Dosimetric System	N/A	N/A
Robot RX60L	N/A	F00/5H31A1/A/01
Robot Controller	N/A	F01/5J72A1/A/01
Dell Computer Optiplex GX110	N/A	N/A
Pentium III, Windows NT	N/A	N/A
SPEAG EDC3	N/A	N/A
SPEAG DAE3	2003-06	456
SPEAG E-Field Probe ET3DV6	2004-09-07	1604
SPEAG Dummy Probe	N/A	N/A
SPEAG Generic Twin Phantom	N/A	N/A
SPEAG Light Alignment Sensor	N/A	278
Apprel Validation Dipole D-1800-S-2	2003-11-06	BCL-049
SPEAG Validation Dipole D900V2	2004-09-03	122
Brain Equivalent Matter (800MHz)	Daily	N/A
Brain Equivalent Matter (1900MHz)	Daily	N/A
Brain Equivalent Matter (2450MHz)	Daily	N/A
Muscle Equivalent Matter (800MHz)	Daily	N/A
Muscle Equivalent Matter (1900MHz)	Daily	N/A
Muscle Equivalent Matter (2450MHz)	Daily	N/A
Robot Table	N/A	N/A
Phone Holder	N/A	N/A
Phantom Cover	N/A	N/A
HP Spectrum Analyzer HP8593GM	2004-06-20	3009A00791
Microwave Amp. 8349B	N/A	2644A02662
Power Meter HP436A	2004-04-02	2709A29209
Power Sensor HP8482A	2004-04-02	2349A08568
Signal Generator RS SMIQ O3	2004-02-10	1084800403
Network Analyzer HP-8753ES	2004-07-30	820079
Dielectric Probe Kit HP85070A	N/A	N/A
Apprel Validation Dipole D-2450-S-1	2003-10-01	BCL-141

# 2.2 Equipment Calibration Certificate

Please see the attached file.

#### Lugineering

Zeughausstrasse 43, 8004 Zurich, Switzerland, Phone +41 1 245 97 00, Fax +41 1 245 97 79

# **Additional Conversion Factors**

for Dosimetric E-Field Probe

Туре	ET3DV6
Serial Number:	1604
Place of Assessment	Zurich
Date of Assessment:	October 4, 2002
Probe Calibration Date:	August 26, 2002

Schmid & Partner Engineering AG hereby certifies that conversion factor(s) of this probe have been evaluated on the date indicated above. The assessment was performed using the FDTD numerical code SEMCAD of Schmid & Partner Engineering AG. Since the evaluation is coupled with measured conversion factors, it has to be recalculated yearly, i.e., following the re-calibration schedule of the probe. The uncertainty of the numerical assessment is based on the extrapolation from measured value at 900 MHz or at 1800 MHz.

Please Vety =

Assessed by:

# Conversion Factor (± standard deviation)

150 MHz	ConvF	9.2 <u>+</u> 8%	$\varepsilon_r = 52.3$ $\sigma = 0.76 \text{ mho/m}$ (head tissue)
300 MHz	ConvF	8.0 ± 8%	$\varepsilon_r = 45.3$ $\sigma = 0.87 \text{ mho/m}$ (head tissue)
450 MHz	ConvF	7.3 <u>+</u> 8%	$\varepsilon_r = 43.5$ $\sigma = 0.87 \text{ mho/m}$ (head tissue)
2450 MHz	ConvF	4.7 <u>+</u> 8%	$\epsilon_r = 39.2$ $\sigma = 1.80 \text{ mho/m}$ (head tissue)
150 MHz	ConvF	8.8 ± 8%	$\varepsilon_r = 61.9$ $\sigma = 0.80 \text{ mho/m}$ (body tissue)
450 MHz	ConvF	7.7 ± 8%	$\varepsilon_r = 56.7$ $\sigma = 0.94 \text{ mho/m}$ (body tissue)
2450 MHz	ConvF	4.3 ± 8%	$\epsilon_r = 52.7$ $\sigma = 1.95 \text{ mho/m}$ (body tissue)

# Schmid & Partner Engineering AG

Zeughausstrasse 43, 8004 Zurich, Switzerland, Phone +41 1 245 97 00, Fax +41 1 245 97 79

# **Calibration Certificate**

#### Dosimetric E-Field Probe

Туре:	ET3DV6
Serial Number:	1604
Place of Calibration:	Zurich
Date of Calibration:	August 26, 2002
Calibration Interval:	12 months

Schmid & Partner Engineering AG hereby certifies, that this device has been calibrated on the date indicated above. The calibration was performed in accordance with specifications and procedures of Schmid & Partner Engineering AG.

Wherever applicable, the standards used in the calibration process are traceable to international standards. In all other cases the standards of the Laboratory for EMF and Microwave Electronics at the Swiss Federal Institute of Technology (ETH) in Zurich, Switzerland have been applied.

Approved by:

N. Veller

Menie Valga

# DASY3 - Parameters of Probe: ET3DV6 SN:1604

# Sensitivity in Free Space

# **Diode Compression**

NormX	1.73 μV/(V/m) <sup>2</sup>	DCP X	93	mV
NormY	1.68 μV/(V/m) <sup>2</sup>	DCP Y	93	mV
NormZ	1.72 μV/(V/m) <sup>2</sup>	DCP Z	93	mV

# Sensitivity in Tissue Simulating Liquid

Head Head	900 MHz 835 MHz	$\varepsilon_{\rm r} = 41.5 \pm 5\%$ $\varepsilon_{\rm r} = 41.5 \pm 5\%$	$\sigma$ = 0.97 ± 5% mho/m $\sigma$ = 0.90 ± 5% mho/m
	ConvF X	6.5 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	6.5 ± 9.5% (k=2)	Alpha 0.36
	ConvF Z	6.5 ± 9.5% (k=2)	Depth <b>2.82</b>
Head	1800 MHz	$\varepsilon_{\rm r}$ = 40.0 ± 5%	$\sigma$ = 1.40 ± 5% mho/m
Head Head	1800 MHz 1900 MHz	$\varepsilon_{\rm r}$ = 40.0 ± 5% $\varepsilon_{\rm r}$ = 40.0 ± 5%	$\sigma$ = 1.40 ± 5% mho/m $\sigma$ = 1.40 ± 5% mho/m
		•	
	1900 MHz	$\epsilon_{\rm r}$ = 40.0 ± 5%	$\sigma$ = 1.40 ± 5% mho/m

# **Boundary Effect**

Head 900 MHz Typical SAR gradient: 5	5 % per mm
--------------------------------------	------------

Probe Tip to Boundary		1 mm	2 mm
SAR <sub>be</sub> [%]	Without Correction Algorithm	11.1	6.6
SAR <sub>be</sub> [%]	With Correction Algorithm	0.4	0.6

Head 1800 MHz Typical SAR gradient: 10 % per mm

Probe Tip to Boundary		1 mm	2 mm
SAR <sub>be</sub> [%]	Without Correction Algorithm	12.3	8.1
SAR <sub>be</sub> [%]	With Correction Algorithm	0.1	0.1

# Sensor Offset

Probe Tip to Sensor Center	2.7	mm
Optical Surface Detection	1.3 ± 0.2	mm

# Body 2450 Mhz Liquid Measurement, 2003-09-04

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		Body Liquid	2450	MHz.txt
Fraguency	e' e''			
frequency	53.8068	14.1283		
2400000000.0000	53.0000	14.1312		
2402083333.3333	53.7895			
2404166666.6667	53.7781	14.1354		
2406250000.0000	53.7804	14.1403		
2408333333.3333	53.7442	14.1448		
2410416666.6667	53.7107	14.1393		
2412500000.0000	53.6473	14.1298		
2414583333.3333	53.6856	14.1597		
2416666666.6667	53.6924	14.1531		
2418750000.0000	53.6678	14.1552		
2420833333.3333	53 6601	14.1514		
2422916666.6667	53.6691 53.6613	14.1718		
	53.6305	14.1761		
2425000000.0000	53.6303	14.1835		
2427083333.3333	53.6116			
2429166666.6667	53.5615	14.2443		
2431250000.0000	53.5772	14.2451		
2433333333.3333	53.5454	14.2540		
2435416666.6667	53.5381	14.2625		
2437500000.0000	53.5725	14.2864		
2439583333.3333	53.5752	14.3167		
2441666666.6667	53.5501 53.5467	14.3111		
2443750000.0000	53 5467	14.3173		
2445833333.3333	53.5942	14.3357		
	53.5473	14.3658		
2447916666.6667	52 4727	14.3833		
2450000000.0000	53.4737			
2452083333.3333	53.4825	14.3921		
2454166666.6667	53.4168	14.4322		
2456250000.0000	53.5417	14.4318		
2458333333.3333	53.5215	14.4397		
2460416666.6667	53.5072	14.4843		
2462500000.0000	53.475 <del>4</del>	14.5108		
2464583333.3333	53.4582	14.5404		
2466666666.6667	53.4937	14.5311		
2468750000.0000	53.4544	14.5533		
2470833333.3333	53.4345	14.5907		
2472916666.6667	53.4714	14.6052		
2475000000.0000	53.4473	14.6045		
2477083333.3333	53.4465	14.6961		
2479166666.6667	53.4892	14.6405		
2481250000.0000	53.4874	14.6521		
2483333333.3333	53.4717	14.6542		
2485416666.6667	53.4744	14.6308		
2487500000.0000	53.4611	14.6522		
2489583333.3333	53.4565	14.6855		
2491666666.6667	53.4334	14.6717		
2493750000.0000	53.4432	14.6782		
2495833333.3333	53.4945	14.6804		
2497916666.6667	53.4881	14.6813		
2500000000.0000		14.6727		

$$\sigma = \omega \, \varepsilon_o \, \varepsilon'' = 2 \, \pi f \, \varepsilon_o \, \varepsilon'' = 1.96$$
  
where  $f = 2450x \, 10^o$   
 $\varepsilon_o = 8.854 \, x \, 10^{-12}$   
 $\varepsilon'' = 14.3833$ 

### Head 2450 Mhz Liquid Measurement, 2003-09-04

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		Heau Liquiu	2430 MIZ. CA
frequency	e' e''		
2425000000.0000	e' e'' 40.8955 40.8965 40.8892 40.8757 40.8952	13.6838	
	40.0555	13.6902	
2426000000.0000	40.8965	13.0902	
2427000000.0000	40.8892	13.6956	
2428000000.0000	40.8757	13.6968	
2429000000.0000	40 8952	13.7157	
_ : = = = = = = = = = = = = = = = = = =	40.0332	13.7636	
2430000000.0000	40.31/0	13.1030	
2431000000.0000	40.9330	13.8157	
2432000000.0000	40.9330 40.9329	13.8305	
2433000000.0000			
2434000000.0000	40 9278	13.8340	
	40.3276	13.0370	
2435000000.0000	40.9330	13.8476	
2436000000.0000	40.9247	13.8612	
2437000000.0000	40.9248	13.8489	
2438000000.0000	40.9332	13.8377	
_ : = = = = = = = : = = = =	40 0251	13.8245	
2439000000.0000	40.9231	13.0275	
2440000000.0000	40.9236	13.8515	
2441000000.0000	40.9004	13.8573	
2442000000.0000	40.8922	13.8776	
2443000000.0000	40.9207	13.8597	
2444000000.0000	40 8935	13.8718	
	40.0333	13.8517	
2445000000.0000	40.9169	13.031/	
2446000000.0000	40.8814	13.8726	
2447000000.0000	40.8587	13.8339	
2448000000.0000	40.8110	13.8164	
2449000000.0000	40.8426	13.8206	
	40 8000	13.8156	
2450000000.0000	40.0000	13.8173	
2451000000.0000	40.7909	13.01/3	
2452000000.0000	40.8525	13.8437	
2453000000.0000	40.8511	13.8775	
2454000000.0000	40.8605	13.8782	
2455000000.0000	40 8603	13.9036	
	40.0003	13.8857	
2456000000.0000	40.0204	13.0057	
2457000000.0000	40.8297	13.8987	
2458000000.0000	40.8392	13.8858	
2459000000.0000	40.8721	13.9086	
2460000000.0000	40.8377	13.8980	
2461000000.0000	40 8462	13.9068	
	40.0402	13.8980	
2462000000.0000	40.0007	13.0900	
2463000000.0000	40.8723	13.9483	
2464000000.0000	40.8362	13.9299	
2465000000.0000	40.8515	13.9185	
2466000000.0000	40 8571	13.9454	
2467000000.0000	40.8305	13.9549	
	40.0293	12.5373	
2468000000.0000	40.8719	13.9123	
2469000000.0000	40.9454 40.9278 40.9247 40.9248 40.9236 40.9236 40.9207 40.8922 40.9207 40.8927 40.8814 40.8587 40.8581 40.8525 40.8525 40.8603 40.8603 40.8297 40.83921	13.9136	
2470000000.0000	40.8404	13.8756	
2471000000.0000	40.8583	13.8703	
2472000000.0000	40 8476	13.9086	
	40.04/0	13.8839	
2473000000.0000	40.0333	13.0033	
2474000000.0000		13.8491	
2475000000.0000	40.8286	13.8408	

$$\sigma = \omega \varepsilon_0 \varepsilon'' = 2 \pi f \varepsilon_0 \varepsilon'' = 1.88$$
where  $f = 2450x 10^6$ 

$$\varepsilon_0 = 8.854 x 10^{-12}$$

$$\varepsilon'' = 13.8156$$

#### 3 - EUT SUMMARY

The *Ambit Microsystems Corporation's*, model: *T60H677.03*, or the "EUT" as referred to in this report is an MiniPCI 802.11a/b/g Module which measures approximately2.4"L x 1.7"W x 0.1"H. The EUT is a dual band WLAN device that allows for acces to both 2.4GHz and 5GHz WLAN technologies. THE EUT will operate at a maximum data rate of 11Mbps with 802.11b (2.4GHz), 54Mbps with 802.11g (2.4GHz) wireless networks and a minimum data rate of 54Mbps with 802.11a (5GHz) wireless networks. The EUT will automatically detect and seamlessly roam between both 802.11b (2.4GHz), 802.11g (2.4GHz) and 802.11a (5GHz) wireless networks.

\* The test data gathered are from typical production samples provided by the manufacturer.

#### 4 - SYSTEM TEST CONFIGURATION

#### 4.1 Justification

The system was configured for testing in a typical fashion (as normally used by a typical user).

#### 4.2 EUT Exercise Software and Procedure

The EUT exercising program used during SAR testing was designed to exercise the various system components in a manner similar to a typical use. The test software, provided by the customer, is started the Windows terminal program under the Windows 98/2000/ME/XP operating system.

Once loaded, set the Tx channel to low, mid and high for testing.

#### 4.3 Special Accessories

All interface cables used for compliance testing are shielded as normally supplied by INMAC, Monster Cable and their respective support equipment manufacturer. The EUT is featured shielded metal connectors.

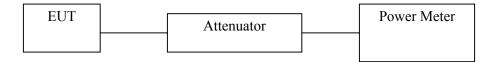
#### 4.4 Equipment Modifications

No modification(s) were made to ensure that the EUT complies with the applicable limits.

# **5 - CONDUCTED OUTPUT POWER MEASUREMENT**

#### **5.1 Measurement Procedure**

- 1. Place the EUT on a bench and set it in transmitting mode.
- 2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to a spectrum analyzer.
- 3. Add a correction factor to the display.



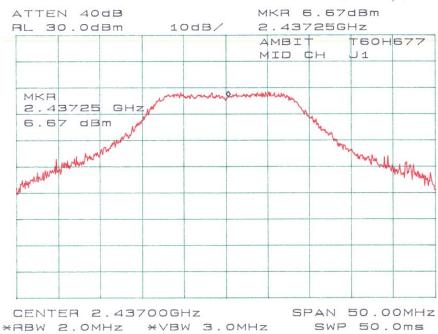
#### **5.2 Test Results**

	Frequency (MHz)	Peak Output Power (dBm)	Correction Factor (dBm)	Corrected Factor (dBm)	Output Power (W)	Standard (W)	Result
802.11b	2437	9.33	7.2	16.53	0.045	<u>&lt;</u> 1W	Compliant
802.11g	2437	6.67	9.3	15.97	0.040	<u>&lt;</u> 1W	Compliant

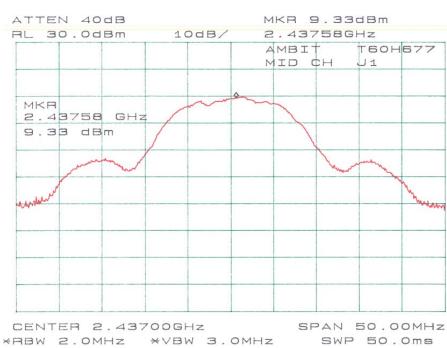
#### **5.3 Measurement Plots**

Please refer to the plots hereinafter.

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#### 6 - DOSIMETRIC ASSESSMENT SETUP

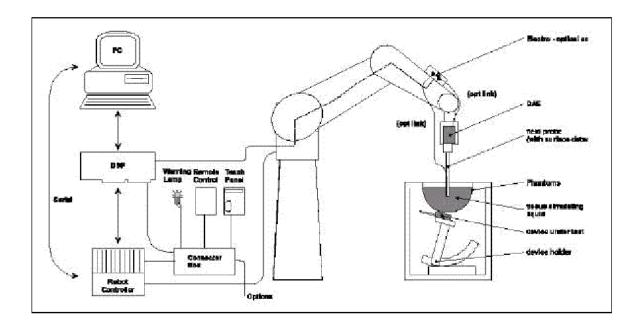
These measurements were performed with the automated near-field scanning system DASY3 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9m) which positions the probes with a positional repeatability of better than  $\pm 0.02$ mm. 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 system is described in detail in [3].

The SAR measurements were conducted with the dosimetric probe ET3DV6 SN: 1604 (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  $\pm 0.25 \, \mathrm{dB}$ .

The phantom used was the \Generic Twin Phantom" described in [4]. The ear was simulated as a spacer of 4 mm thickness between the earpiece of the phone and the tissue simulating liquid. The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

Ingredients					Frequer	ncy (MHz)				
(% by weight)	45	0	83	35	9	15	19	00	24	50
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (Nacl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton x-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (s/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

#### 6.1 Measurement System Diagram



The DASY3 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. 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. 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.
- 6. A computer operating Windows 95 or larger
- 7. DASY3 software
- 8. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
- 9. The generic twin phantom enabling testing left-hand and right-hand usage.
- 10. The device holder for handheld EUT.
- 11. Tissue simulating liquid mixed according to the given recipes (see Application Note).
- 12. System validation dipoles to validate the proper functioning of the system.

#### **6.2 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 ± 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:  $\pm 0.2 \text{ dB}$ 

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

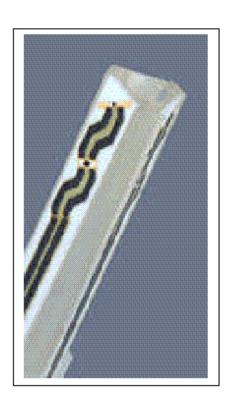
Compliance tests of mobile phones

Fast automatic scanning in arbitrary phantoms

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 DASY3 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.



Photograph of the probe



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.

#### **Data Evaluation**

The DASY3 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:

Probe Parameter:	-Sensitivity	$Norm_i$ , $a_{i0}$ , $a_{i1}$ , $a_{i2}$
	-Conversion Factor	ConvFi
	-Diode compression point	$Dcp_i$
Device parameter:	-Frequency	f
•	-Crest Factor	cf
Media parameter:	-Conductivity	σ
_	-Density	ρ

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 DASY3 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:

$$Vi = Ui + (Ui)^2 cf / dcp_i$$

With Vi = compensated signal of channel i (i =x, y, z) Ui = input signal of channel i (i =x, y, z) cf = crest factor of exciting field (DASY parameter)  $dcp_i = diode$  compression point (DASY parameter) From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes: 
$$E_{i} = \sqrt{\frac{V_{i}}{Norm_{i} \cdot ConvF}}$$
H-field probes: 
$$H_{i} = \sqrt{Vi} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^{2}}{f}$$

With Vi = compensated signal of channel i (i = x, y, z)  $Norm_i$  = sensor sensitivity of channel i (i = x, y, z)

 $\mu V/(V/m)^2$  for E-field probes

ConF = sensitivity enhancement in solution

a<sub>ii</sub> = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

Ei = electric field strenggy of channel i in V/m H<sub>i</sub> = diode compression point (DASY parameter)

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

$$E_{tot} = Square Root [(E_x)^2 + (E_y)^2 + (E_z)^2]$$

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

$$SAR = (E_{tot})^2 \cdot \sigma / (\rho \cdot 1000)$$

With SAR = local specific absorption rate in mW/g

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

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

 $\rho$  = equivalent tissue density in g/cm<sup>3</sup>

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.

$$P_{\text{pwe}} = (E_{\text{tot}})^2 / 3770 \text{ or } P_{\text{pwe}} = (H_{\text{tot}})2 \cdot 37.7$$

With  $P_{pwe}$  = equivalent power density of a plane wave in mW/cm3

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

 $H_{tot}$  = total magnetic filed strength in V/m

#### **Generic Twin Phantom**

The Generic Twin Phantom is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users [9][10]. 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 the evaporation of the liquid. Reference markings on the Phantom allows the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. Shell Thickness  $2 \pm 0.1$  mm Filling Volume Approx. 20 liters Dimensions  $810 \times 1000 \times 500$  mm (H x L x W)

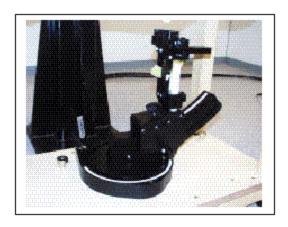


**Generic Twin Phantom** 

#### **Device Holder**

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** 

### **6.3 Measurement Uncertainty**

The uncertainty budget has been determined for the DASY3 measurement system according to the NIS81 [13] and the NIST1297 [14] documents and is given in the following Table.

# Measurement Uncertainty Analysis per IEEE P1528-2002

		Reported Variance	Probability Distribution					welc/satt
Description	Section	(%)	type	Divisor	Ci (1g)	Ui (1g)	Vi	series term
Probe Calibration	E.2.1	4.80	N	1	1	4.80	1.00E+09	5.30842E-07
Axial isotropy	E.2.2	4.70	R	1.732	0.707107	1.92	1.00E+09	1.35563E-08
Hemispherical isotropy	E.2.2	9.60	R	1.732	0.707107	3.92	1.00E+09	2.35957E-07
Boundary effects	E.2.3	8.30	R	1.732	1	4.79	1.00E+09	5.27377E-07
Linearity	E.2.4	4.70	R	1.732	1	2.71	1.00E+09	5.4225E-08
System Detection Limit	E.2.5	1.00	R	1.732	1	0.58	1.00E+09	1.11124E-10
Readout Electronics	E.2.6	0.00	N	1	1	0.00	1.00E+09	0
Response time	E.2.7	0.00	R	1.732	1	0.00	1.00E+09	0
Integration time	E.2.8	0.00	R	1.732	1	0.00	1.00E+09	0
RF Ambient conditions	E.6.1	3.00	R	1.732	1	1.73	1.00E+09	9.00106E-09
Probe positioning mechanical tolerance	E.6.2	0.40	R	1.732	1	0.23	1.00E+09	2.84478E-12
Probe positioning wrt phantom shell	E.6.3	2.90	R	1.732	1	1.67	1.00E+09	7.8596E-09
Extra/inter-polation & integration algorithmsfor max								
SAR evaluation	E.5.2	3.90	R	1.732	1	2.25	1.00E+09	2.57079E-08
Test sample positioning	8, E.4.2	6.00	R	1.732	1	3.46	1.00E+09	1.44017E-07
Device holder distance tolerance	E.4.1	5.00	N	1	1	5.00	1.00E+09	0.000000625
Output power and SAR drift measurement	8, E.6.6.2	5.00	R	1.732	1	2.89	1.00E+09	6.94526E-08
Phantom uncertainty, shell thickness tolerance	E.3.1	4.00	R	1.732	1	2.31	1.00E+09	2.84478E-08
Liquid conductivity, deviation from target values	E.3.2	5.00	R	1.732	0.64	1.85	1.00E+09	1.16522E-08
Liquid conductivity, measurement uncertainty	E.3.3	5.00	N	1	0.64	3.20	5	20.97152
Liquid permitivity, deviation from target values	E.3.2	5.00	R	1.732	0.6	1.73	1.00E+09	9.00106E-09
Liquid permitivity, measurement uncertainty	E.3.3	5.00	N	1	0.6	3.00	5	16.2
								689
Probe isotropy sensitivity coefficient	0.5							
Combined Standard Uncertainty						12.65	%	
Expanded Uncertainty, 95%		k=	2.0036			25.34	%	

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#### 7 - SYSTEM EVALUATION

#### 7.1 Simulated Tissue Liquid Parameter Confirmation

The dielectric parameters were checked prior to assessment using the HP85070A dielectric probe kit. The dielectric parameters measured are reported in each correspondent section:

#### 7.2 Evaluation Procedures

#### **Maximum Search**

The maximum search is automatically performed after each coarse 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 spacings. After the coarse scan 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.

#### **Extrapolation**

The extrapolation can be used in z-axis scans with automatic surface detection. The SAR values can be extrapolated to the inner phantom surface. The extrapolation distance is the sum of the probe sensor offset, the surface detection distance and the grid offset. The extrapolation is based on fourth order polynomal functions. The extrapolation is only available for SAR values.

#### **Boundary Corrections**

The correction of the probe boundary effect in the vicinity of the phantom surface can be done in two different ways. In the standard (worse case) evaluation, the boundary effect is reduced by different weights for the lowest measured points in the extrapolation routine. The result is a slight overestimation of the extrapolated SAR values (2% to 8%) depending on the SAR distribution and gradient. The advanced evaluation makes a full compensation of the boundary effect before doing the extrapolation. This is only possible of probes with specifications on the boundary effect.

#### Peak Search for 1g and 10g cube averaged SAR

The 1g and 10g peak evaluations are only available for the predefined cube 4x4x7 and cube 5x5x7 scans. The routine are verified and optimized for the grid dimensions used in these cube measurements. The measured volume of 32x32x35mm contains about 35g 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 get all points within the measured volume in a 1mm grid (35000 points). In the last step, a 1g cube is place numerically into the volume and its averaged SAR is calculated. This cube is the moved around until the highest averaged SAR is found. This last procedure is repeated for a 10g cube. 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.

# 7.3 System Accuracy Verification

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

IEEE P1528 recommended reference value for Head

Frequency (MHz)	1 g SAR	10 g SAR	Local SAR at surface (above feed point)	Local SAR at surface (v=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

#### Validation Dipole SAR Reference Test Result for Body (2450 MHz)

Validation Measurement	SAR @ 0.025W Input averaged over 1g	SAR @ 1W Input averaged over 1g	SAR @ 0.025W Input averaged over 10g	SAR @ 1W Input averaged over 10g
Test 1	14.2	56.80	6.33	25.32
Test 2	14.3	57.20	6.34	25.36
Test 3	14.2	56.80	6.33	25.32
Test 4	14.1	56.40	6.32	25.28
Test 5	14.3	57.20	6.33	25.32
Test 6	14.0	56.00	6.31	25.24
Test 7	14.2	56.80	6.33	25.32
Test 8	14.2	56.80	6.33	25.32
Test 9	14.4	57.60	6.34	25.36
Test 10	14.2	56.80	6.32	25.28
Average	14.21	56.84	6.32	25.31

#### System validation result

#### D800 NEWEB:

Simulant	Freq [MHz]	Parameters	Liquid Temp [°C]	Target Value	Measured Value	Deviation [%]	Limits [%]
		3	22	52.7	53.5	-1.52	±5
Body	2450	σ	22	1.95	1.96	-0.51	±5
		1g SAR	22	56.84	55.87	1.71	±10
		3	21	39.2	40.8	-4.08	±5
Head	2450	σ	21	1.80	1.88	-4.44	±5
		1g SAR	21	52.4	52.05	6.68	±10

 $\epsilon$  = relative permittivity,  $\sigma$  = conductivity and  $\rho$ =1000kg/m³ Note: Body Forward power = 20.96 dBm = 124.74 mW Head Forward power =20.2 dBm = 104.71 mW

# System Validation for 2450 MHz Body Liquid (Ambient Temp = 23 Deg C, Liquid Temp = 22 Deg C, Forward Power = 20.96 dBm, 9/4/2003)

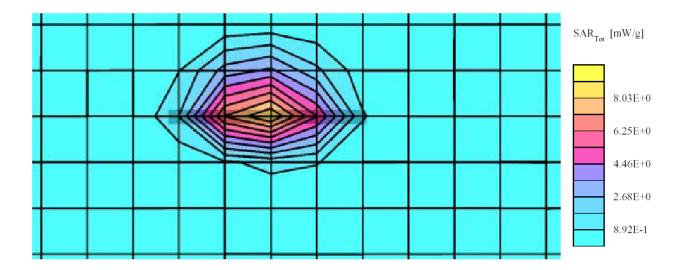
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2450 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz:  $\sigma = 1.96 \text{ mho/m} \ \epsilon_r = 53.5 \ \rho = 1.00 \text{ g/cm}^3$ 

Cube 5x5x7: SAR (1g): 6.97 mW/g, SAR (10g): 2.93 mW/g, (Worst-case extrapolation)

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdrift: 0.04 dB



# System Validation for 2450 MHz Head Liquid (Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, Forward Power = 20.2 dBm, 9/4/2003)

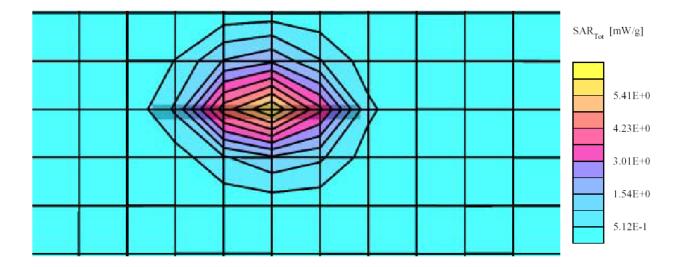
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2450 MHz

Probe: ET3DV6 - SN1604; ConvF(4.70,4.70,4.70); Crest factor: 1.0; 2450 MHz:  $\sigma$  = 1.88 mho/m  $\epsilon_r$  = 40.8  $\rho$  = 1.00 g/cm<sup>3</sup>

Cube 5x5x7: SAR (1g): 5.45 mW/g, SAR (10g): 2.57 mW/g, (Worst-case extrapolation)

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdrift: 0.01 dB



#### 7.4 SAR Evaluation Procedure

- a. The evaluation was performed in the applicable area of the phantom depending on the type of device being tested. For device held to the dear during normal operation, both the left and right ear positions were evaluated in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01) using the SAM phantom. For body-worn and face-held devices a planar phantom was used. The EUT in the test setup for body-worn and face-held devices was placed in three different positions (relative to the phantom): parallel, bystand (perpendicular) and 1.5cm separation.
- b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.
- c. A 5x5x7 matrix was performed around the greatest special SAR distribution found during the area scan of the applicable exposed region. SAR values were then calculated using a 3-D spline interpolation algorithm and averaged over spatial volumes of 1 and 10 grams.
- d. The depth of the simulating tissue in the planar used for the SAR evaluation and system validation was no less than 15.0cm.
- e. For this particular evaluation, a stack of low-density, low-loss dielectric foamed polystyrene was used in place of the device holder.
- f. Re-measurement of the SAR value at the same location as in a. If the value changed by more than 5%, the evaluation was repeated.

### 7.5 Exposure Limits

Table 1: Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands. Wrists. Feet and Ankles
0.4	8.0	20.0

Table 2: Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands. Wrists. Feet and Ankles
0.08	1.6	4.0

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, writs, 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 individual 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).

Population/uncontrolled environments Partial-body limit 1.6W/kg applied to the EUT.

# 8 - TEST RESULTS

This page summarizes the results of the performed dosimetric evaluation. The plots with the corresponding SAR distributions, which reveal information about the location of the maximum SAR with respect to the device could be found in the following pages.

According to the data in section 6.1, the EUT <u>complied with the FCC 2.1093 RF Exposure</u> standards, with worst case of **1.53**.

#### 8.1 SAR Body-Worn Test Data

Ambient Temperature (°C): 23.0 Relative Humidity (%): 53.5

Worst case SAR reading

	EUT position	Frequency (MHz)	Output Power (W)	Test Type	Antenna Type	Liquid	Phantom	Measured (mW/g)	Limit (mW/g)	Plot #
802.11b	Back touching,			Body						
	antenna at left	2437	0.045	worn	Built-in	body	flat	0.108	1.6	1
	Back touching,			Body						
	antenna at right	2437	0.045	worn	Built-in	body	flat	0.0142	1.6	2
	Back touching,			Body						
	antenna at left	2437	0.040	worn	Built-in	body	flat	0.115	1.6	3
	Back touching,			Body						
802.11g	antenna at right	2437	0.040	worn	Built-in	body	flat	0.0089	1.6	4

#### **8.2 Plots of Test Result**

The plots of test result were attached as reference.

# Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Left side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

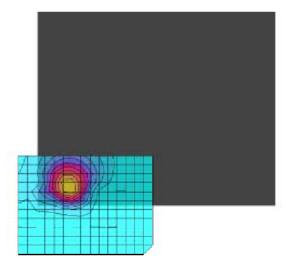
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2437 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz :  $\sigma = 1.96$  mho/m  $\epsilon_r = 53.5$   $\rho = 1.00$  g/cm<sup>3</sup>

Cube 5x5x7: SAR (1g): 0.108 mW/g, SAR (10g): 0.0617 mW/g, (Worst-case extrapolation)

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdrift: 0.03 dB





Plot # 1

# Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Right side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

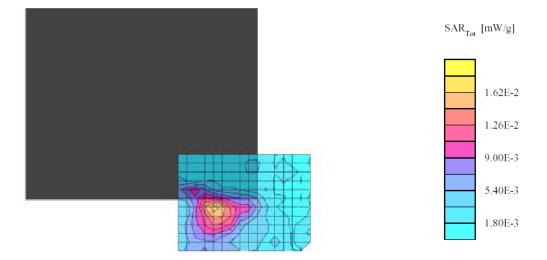
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2437 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz :  $\sigma$  = 1.96 mho/m  $\epsilon_r$  = 53.5  $\rho$  = 1.00 g/cm<sup>3</sup>

 $Cube\ 5x5x7;\ SAR\ (1g);\ 0.0142\ mW/g,\ SAR\ (10g);\ 0.0085\ mW/g,\ (Worst-case\ extrapolation)$ 

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdrift: 0.02 dB



Plot # 2

# Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Left side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

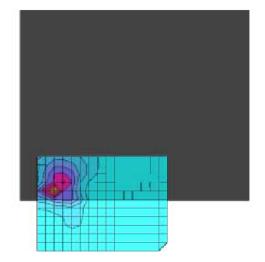
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2437 MHz

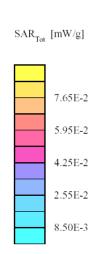
Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz :  $\sigma = 1.96$  mho/m  $\epsilon_r = 53.5$   $\rho = 1.00$  g/cm<sup>3</sup>

Cube 5x5x7: SAR (1g): 0.115 mW/g, SAR (10g): 0.0650 mW/g, (Worst-case extrapolation)

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdrift: 0.05 dB





Plot # 3

# Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Right side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

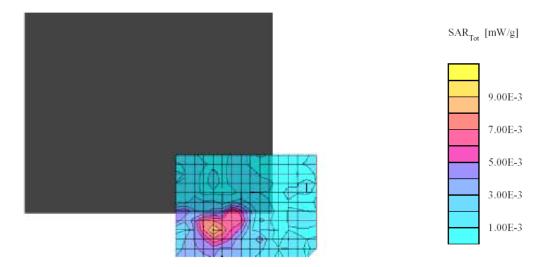
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 2437 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz :  $\sigma$  = 1.96 mho/m  $\epsilon_r$  = 53.5  $\rho$  = 1.00 g/cm<sup>3</sup>

Cube 5x5x7: SAR (1g): 0.0089 mW/g, SAR (10g): 0.0052 mW/g, (Worst-case extrapolation)

Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0

Powerdroft: -0.03 dB



Plot # 4

# **EXHIBIT A - SAR SETUP PHOTOGRAPHS**

# Back Touching Flat Phantom – Antenna at Right



# **Back Touching Flat Phantom – Antenna at Left**



# **EXHIBIT B - EUT PHOTOGRAPHS**

# **Notebook Top View**



# **Notebook Front View**



# **Laptop Rear View**



# **Laptop Bottom View**



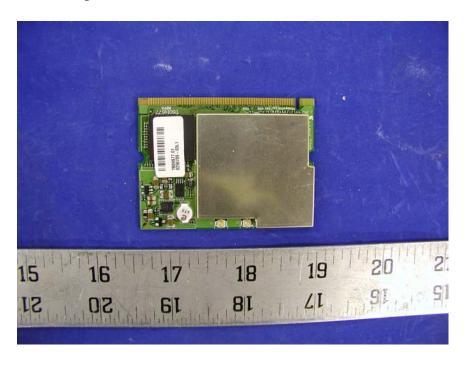
# **Antenna Location 1**



# **Antenna Location 2**



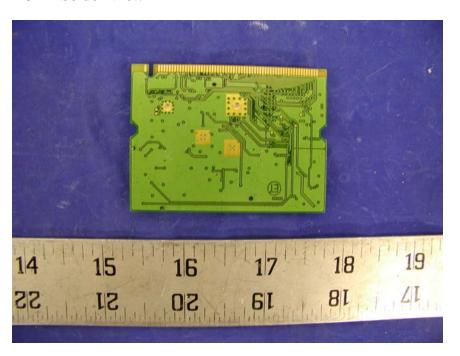
# **EUT – Top View**



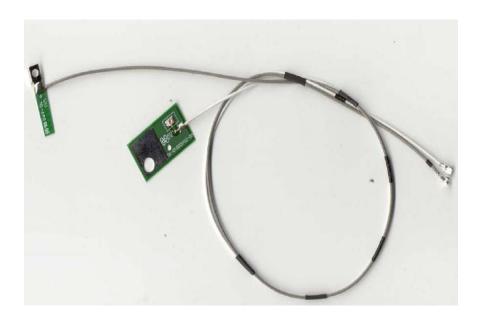
**EUT – Cover Removed View** 



### **EUT - Solder View**



# **Antenna View**



# **AC Power Adapter View**



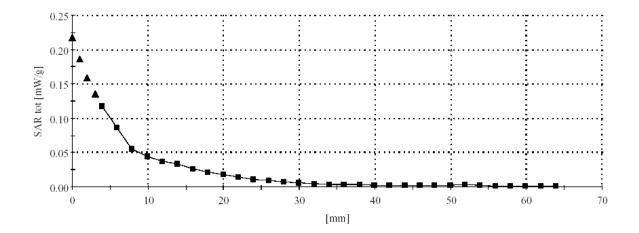
# **EXHIBIT C – Z-Axis**

Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Left side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

SAM Phantom; Section; Position: ; Frequency: 2437 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz :  $\sigma = 1.96$  mho/m  $\epsilon_r = 53.5$   $\rho = 1.00$  g/cm<sup>3</sup> : 0

:, () Z-Axis: Dx = 0.0, Dy = 0.0, Dz = 2.0



# Ambit, T60H677.03 (Back touching flat phantom, Antenna position: Left side, Middle channel, Ambient Temp = 23 Deg C, Liquid Temp = 21 Deg C, 9/4/2003)

SAM Phantom; Section; Position: ; Frequency: 2437 MHz

Probe: ET3DV6 - SN1604; ConvF(4.30,4.30,4.30); Crest factor: 1.0; 2450 MHz:  $\sigma = 1.96 \text{ mho/m} \ \epsilon_r = 53.5 \ \rho = 1.00 \text{ g/cm}^3$ 

:, () Z-Axis: Dx = 0.0, Dy = 0.0, Dz = 2.0

