

SAR Evaluation Report

IN ACCORDANCE WITH THE REQUIREMENTS OF FCC REPORT AND ORDER: ET DOCKET 93-62 AND OET BULLETIN 65 SUPPLEMENT C And RSS-102 Issue 1 (Provisional) September 25, 1999

FOR

850/900/1800/1900/2100 MHz 5-Band Mini Card Module

Model: MC8755

FCC ID: N7NMC8755

REPORT NUMBER: 05U3781-3

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Prepared for

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LAB CODE:200065-0

Revision History

Rev.	Issued date	Revisions	Revised By
A	December 9, 2005	Initial Issue	HS

CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

DATES OF TEST: December 7-8, 2005

APPLICANT: ADDRESS:	Sierra Wireless, Inc. 13811 Wireless Way Richmond, British Columbia V6V 3A4, Canada
FCC ID:	N7NMC8755
MODEL:	MC8755
DEVICE CATEGORY:	Portable Device
EXPOSURE CATEGORY:	General Population/Uncontrolled Exposure

850/900/1800/1900/2100 MHz 5-Band Mini Card is installed on 14" & 15" Lenovo Davinch Laptops, include collocated with WLNA (Gwinette, FCC ID: PPD-AR5BXB6)

Note: This device contains 900/1800/2100 MHz bands are not operational in US territories. This report is applicable to 850 and 1900 MHz bands.

Test Sample is a:	Production unit						
Host devices:	14" & 15" Lenovo Davinch	4" & 15" Lenovo Davinch					
FCC Rule Parts	Frequency range (MHz)	The highest SAR values					
22H	824.7 – 848.31	The highest reported SAR values are: Body-worn: 0.083 W/kg, Collocated: 0.089 W/kg					
24E	1851.25 – 1908.75	The highest reported SAR values are: Body-worn: 0.065 W/kg, Collocated: 0.067 W/kg					

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled 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 (Edition 01-01). And RSS-102 Issue 1 (Provisional) September 25, 1999.

The maximum 1g SAR level measured for all the tests performed did not exceed the limits for General Population/Uncontrolled Exposure (W/kg) Partial Body of 1.6 W/kg. Level defined in Supplement C (Edition 01-01) to OET Bulletin 65 (97-01).

Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by Compliance Certification Services and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by Compliance Certification Services will constitute fraud and shall nullify the document. No part of this report may be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any government agency.

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1 EQUIPMENT UNDER TEST (EUT) DESCRIPTION

850/900/1800/1900/2100 MHz 5-Band Mini Card is installed on 14" & 15" Lenovo Davinch Laptops, include collocated with WLNA (Gwinette, FCC ID: PPD-AR5BXB6)

Note: This device contains 900/1800/2100 MHz bands are not operational in US territories. This report is applicable to 850 and 1900 MHz bands.

Host devices:	14" & 15" Lenovo Davinch
Power supply:	Power supplied through the laptop computer (host device)
Normal operation:	Lap-held position Photos are confidential, please see a seperate file
CDMA Antenna:	 For 14 inch laptop - FOXCONN, Type WDAN-B1DA1003 For 15 inch laptop - FOXCONN, Type WDAN-B1DA2003

2 FACILITIES AND ACCREDITATION

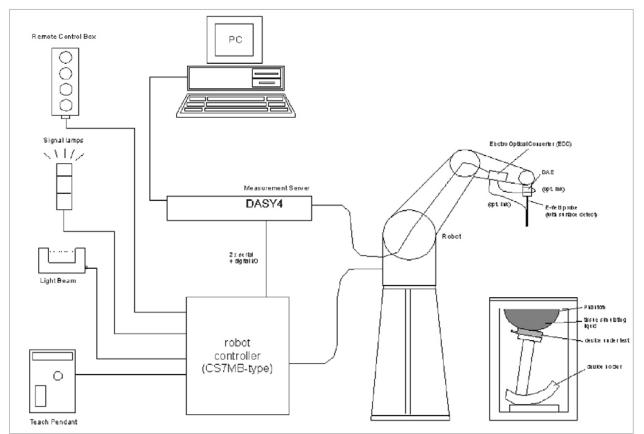
The test sites and measurement facilities used to collect data are located at 561F Monterey Road, Morgan Hill, California, USA. The sites are constructed in conformance with the requirements of ANSI C63.4, ANSI C63.7 and CISPR Publication 22. All receiving equipment conforms to CISPR Publication 16-1, "Radio Interference Measuring Apparatus and Measurement Methods."



CCS is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at http://www.ccsemc.com.

No part of this report may be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any government agency.

3 SYSTEM DESCRIPTION



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

- A standard high precision 6-axis robot (Stäubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- 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.
- Data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, ADconversion, 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.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 2000 or Windows XP.
- DASY4 software.
- Remote controls with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validate the proper functioning of the system.

4 SYSTEM COMPONENT

4.1 DASY4 MEASUREMENT SERVER



The DASY4 measurement server is based on a PC/104 CPU board with a 166MHz low-power Pentium, 32MB chip disk and 64MB RAM. The necessary circuits for communication with either the DAE3 electronic box as well as the 16-bit AD-converter system for optical detection and digital I/O interface are contained on the DASY4 I/O-board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. The PC-operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with two expansion slots which are reserved for future applications. Please note that the expansion slots do not have a standardized pinout and therefore only the expansion cards provided by SPEAG can be inserted. Expansion cards from any other supplier could seriously damage the measurement server. Calibration: No calibration required.

4.2 DATA ACQUISITION ELECTRONICS (DAE)

The data acquisition electronics (DAE3) consists of a highly sensitive electrometer grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, 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 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.

4.3 EX3DV3 ISOTROPIC E-FIELD PROBE FOR DOSIMETRIC MEASUREMENTS

Construction:	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Directivity:	± 0.3 dB in HSL (rotation around probe axis);
	± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range:	10 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB (noise:
	typically < 1 μW/g)
Dimensions:	Overall length: 330 mm (Tip: 20 mm)
	Tip diameter: 2.5 mm (Body: 12 mm)
	Typical distance from probe tip to dipole centers: 1 mm
Application:	High precision dosimetric measurements in any exposure
	scenario (e.g., very strong gradient fields). Only probe
	which enables compliance testing for
	frequencies up to 6 GHz with precision of
	better 30%.



4.4 LIGHT BEAM UNIT

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, so that the robot coordinates are valid for the probe tip. The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.



4.5 SAM PHANTOM (V4.0)

Construction: The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528-200X, 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 ±0.2 mmFilling Volume:Approx. 25 litersDimensions:Height: 810mm; Length: 1000mm; Width: 500mm



4.6 DEVICE HOLDER FOR SAM TWIN PHANTOM

Construction: In combination with the Twin SAM Phantom V4.0 or Twin SAM, the Mounting Device (made from POM) enables the rotation of the mounted transmitter in spherical coordinates, whereby the rotation point is the ear opening. The devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



4.7 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.
Frequency:	450, 900, 1800, 2450, 5800 MHz
Return loss:	> 20 dB at specified validation position
Power capability:	> 100 W (f < 1GHz); > 40 W (f > 1GHz)
Dimensions:	450V2: dipole length: 270 mm; overall height: 330 mm
	D900V2: dipole length: 149 mm; overall height: 330 mm
	D1800V2: dipole length: 72 mm; overall height: 300 mm
	D835V2: dipole length: 161; overall height: 330
	D1900V2: dipole length: 68; overall height: 300
	D2450V2: dipole length: 51.5 mm; overall height: 300 mm D5GHzV2: dipole length:
	25.5 mm; overall height: 290 mm

4.8 COMPOSITION OF INGREDIENTS FOR TISSUE SIMULATING LIQUID

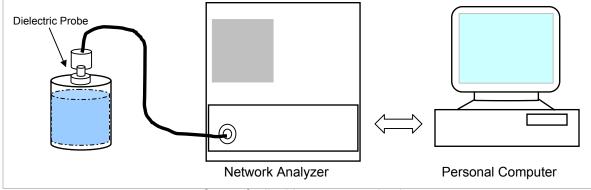
The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients		Frequency (MHz)								
(% by weight)	45	50	835		915		1900		2450	
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

Salt: 99+% Pure Sodium ChlorideSugar: 98+% Pure SucroseWater: De-ionized, 16 M Ω + resistivityHEC: Hydroxyethyl CelluloseDGBE: 99+% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1, 3, 3-tetramethylbutyl)phenyl]ether

5 SIMULATING LIQUID PARAMETERS CHECK

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectric parameters are within the tolerances of the specified target values. The relative permittivity and conductivity of the tissue material should be within \pm 5% of the values given in the table below.



Set-up for liquid parameters check

Reference Values of Tissue Dielectric Parameters for Head and Body Phantom

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in IEEE Standard 1528 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 IEEE Standard 1528.

Target Frequency (MHz)	He	ad	Bo	ody
raiget requercy (wriz)	ε _r	σ (S/m)	ε _r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	<mark>55.2</mark>	<mark>0.97</mark>
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	<mark>53.3</mark>	<mark>1.52</mark>
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

(ε_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

5.1 SIMULATING LIQUID PARAMETER CHECK RESULT

Simulating Liquid Parameter Check Result @ Muscle 835 MHz

Room Ambient Temperature = 22.0 °C; Relative humidity = 30%

Simulating Li f (MHz) Temp. (°C			Parameters	Target	Measured	Deviation (%)	Limit (%)
835 21.8	15	e'	Relative Permittivity (e"):	55.2	53.5219	-3.04	± 5
030 21.0	15	21.1009	Conductivity (o):	0.97	0.9802	1.05	± 5
Liquid Check							
	ire: 22.0 dec	a. C: Liqu	id temperature: 21.8 d	dea C			
December 07, 200		, -, -,-					
Frequency	e'		e"				
750000000.	54.37	723	21.5183				
755000000.	54.3 ²	110	21.4897				
76000000.	54.24	473	21.4858				
765000000.	54.22	203	21.4463				
770000000.	54.18	335	21.4103				
775000000.	54.11	199	21.3954				
78000000.	54.06	608	21.3560				
785000000.	53.99		21.3410				
790000000.	53.94		21.3222				
795000000.	53.90		21.3032				
80000000.	53.86		21.3044				
805000000.	53.82		21.2376				
810000000.	53.77		21.2165				
815000000.	53.72		21.1956				
82000000.	53.67		21.2012				
825000000.	53.63		21.1416				
830000000.	53.55		21.1244				
835000000.	53.52		21.1009				
840000000.	53.46		21.0976				
845000000.	53.40		21.0652				
850000000.	53.37		21.0414				
855000000.	53.32		21.0245				
860000000.	53.26		21.0145				
865000000.	53.23		20.9902				
870000000. 875000000.	53.16 53.1		20.9518 20.9473				
880000000.	53.0		20.9475				
885000000.	53.0		20.9425				
890000000.	52.96		20.9576				
895000000.	52.96		20.9036				
900000000.	52.90		20.8633				
905000000.	52.84		20.8646				
910000000.	52.80		20.8506				
915000000.	52.76		20.8293				
The conductivity (o) can be giv	en as:					
σ = ωε₀ e″= 2 π	fε ₀ e"						
where $\mathbf{f} = target f$							
E ₀ = 8.854 *	10						

Simulating Liquid Dielectric Parameters Check Result @ Muscle 1900 MHz

Room Ambient Temperature = 22°C; Relative humidity = 30%

S	Simulating Liquid			Parameters	Target	Measured	Deviation (%)	Limit (%)			
f (MHz)	Temp. (°C)	Depth (cm)		Parameters	Taiget	Measureu	Deviation (%)	Liitiit (%)			
1900	21.2	15	с"	Relative Permittivity (ε_r):	53.3	51.6976	-3.01	± 5			
1000	21.2	10	14.0802	Conductivity (σ):	1.52	1.48827	-2.09	± 5			
Liquid Che	eck										
Ambient te	Ambient temperature: 22.0 deg. C; Liquid temperature: 21.2 deg C										
Decembe	r 07, 2005	09:41 AM									
Frequency		e'		e"							
17100000	00.	52.4 ⁻	125	13.3513							
17200000	00.	52.36	640	13.3789							
17300000	00.	52.33	314	13.4191							
17400000	00.	52.29	903	13.4771							
17500000	00.	52.25	599	13.5191							
17600000	00.	52.22	239	13.5516							
17700000	00.	52.17	740	13.5994							
17800000	00.	52.14	428	13.6497							
17900000	00.	52.10)79	13.6675							
18000000	00.	52.07	720	13.7114							
18100000	00.	52.03	356	13.7523							
18200000	00.	51.98	335	13.7640							
18300000	00.	51.94	497	13.8032							
18400000	00.	51.90	005	13.8345							
18500000	00.	51.88	303	13.9052							
18600000	00.	51.84	433	13.9336							
18700000	00.	51.77	718	13.9570							
18800000	00.	51.7	552	14.0001							
18900000	00.	51.72	217	14.0300							
1900000	00.	51.69	976	14.0802							
19100000	00.	51.64	476	14.1111							
The condu	uctivity (σ)	can be giv	en as:								
$\sigma = \omega \varepsilon_0$	$\sigma = \omega \varepsilon_0 e'' = 2 \pi f \varepsilon_0 e''$										
where f	= target f *	10 ⁶									
ε0	= 8.854 * 1	10 ⁻¹²									

Simulating Liquid Parameter Check Result @ Muscle 835 MHz

Room Ambient Temperature = 22.5 °C; Relative humidity = 30%

Simulating f (MHz) Temp. (Parameters	Target	Measured	Deviation (%)	Limit (%)
		e'	Relative Permittivity (e"):	55.2	53.5095	-3.06	± 5
835 22	15	21.1275	Conductivity (σ):	0.97	0.9814	1.18	± 5
Liquid Check				0.01	0.0011		_ •
-	turo: 22 5 doc		id temperature: 22.0	dog C			
December 08, 20		ј. С, Liqu	iu temperature. 22.0	uey C			
Frequency	e'		e"				
750000000.	54.36	51	21.5327				
755000000.	54.34		21.4897				
760000000.	54.24		21.4397				
765000000.	54.18		21.4358				
770000000.	54.17		21.4244				
775000000.	54.11		21.3850				
780000000.	54.04		21.3492				
785000000.	54.02		21.3684				
790000000.	53.96		21.3289				
795000000.	53.89		21.3169				
800000000.	53.85	574	21.2942				
805000000.	53.82	280	21.2915				
810000000.	53.76	689	21.2655				
815000000.	53.73	324	21.2205				
820000000.	53.67	754	21.1945				
825000000.	53.60)78	21.1670				
830000000.	53.53	366	21.1412				
835000000.	53.50)95	21.1275				
840000000.	53.49	955	21.0871				
845000000.	53.42	208	21.0582				
850000000.	53.37	744	21.0736				
855000000.	53.37		21.0411				
860000000.	53.28		21.0074				
865000000.	53.20		20.9914				
870000000.	53.11		20.9916				
875000000.	53.09		20.9357				
880000000.	53.04		20.9403				
885000000.	53.00		20.9445				
89000000.	52.96		20.9266				
895000000.	52.92		20.8867				
90000000.	52.87		20.8630				
905000000.	52.82		20.8626				
91000000.	52.78		20.8200				
915000000.	52.75	562	20.7918				
The conductivity	(σ) can be giv	en as:					
$\sigma = \omega \varepsilon_0 e'' = 2$	•						
where f = target							
ε ₀ = 8.854	* 10 ⁻¹²						

Simulating Liquid Dielectric Parameters Check Result @ Muscle 1900 MHz

Room Ambient Temperature = 22.5°C; Relative humidity = 30%

S	imulating Liq	uid		Parameters	Target	Measured	Deviation (%)	Limit (%)		
f (MHz)	Temp. (°C)	Depth (cm)			Ŭ			. ,		
1900	22	15	с"	Relative Permittivity (ε_r):	53.3	53.0261	-0.51	± 5		
			14.1511	Conductivity (σ):	1.52	1.49576	-1.59	± 5		
Liquid Che	Liquid Check									
Ambient te	emperatur	e: 22.5 deg	g. C; Liqu	id temperature: 22.0 (deg C					
December	⁻ 08, 2005	08:31 AM								
Frequency	/	e'		e"						
17100000	00.	53.70	003	13.4481						
17200000	00.	53.66	514	13.4711						
17300000	00.	53.64	487	13.5053						
17400000	00.	53.6	172	13.5625						
17500000	00.	53.57	719	13.5876						
17600000	00.	53.5	189	13.6269						
17700000	00.	53.49	902	13.6749						
17800000	00.	53.4	524	13.7054						
17900000	00.	53.42	283	13.7534						
18000000	00.	53.38	314	13.7812						
18100000	00.	53.36	688	13.8414						
18200000	00.	53.30	081	13.8528						
18300000	00.	53.27	795	13.8982						
18400000	00.	53.24	407	13.9419						
18500000	00.	53.19	965	13.9691						
18600000	00.	53.17	731	14.0251						
18700000	00.	53.14	414	14.0415						
18800000	00.	53.09	947	14.0792						
18900000	00.	53.07	791	14.1287						
<mark>19000000</mark>	00.	53.02	261	14.1511						
19100000	00.	52.99	958	14.2038						
The condu	uctivity (σ)	can be giv	en as:							
σ = $\omega \varepsilon_0$	e″= 2 π i	fε ₀ e″								
where f :										
E 0 :	= 8.854 *	10 ⁻¹²								

6 SYSTEM PERFORMANCE CHECK

The system performance check is performed prior to any usage of the system in order to guarantee reproducible results. The system performance check verifies that the system operates within its specifications of $\pm 10\%$.

System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the SAM twin phantom filled with **Body** simulating liquid of the following parameters.
- The DASY4 system with an Isotropic E-Field Probe EX3DV3-SN: 3531 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
- Special 5 x 5 x 7 fine cube was chosen for cube integration(dx=dy=7.5mm; dz=5mm).
- Distance between probe sensors and phantom surface was set to 2.5 (below 3 G) mm.
- The dipole input power (forward power) was 250 mW±3%.
- The results are normalized to 1 W input power.

Reference SAR Values for body-tissue

In the table below, the numerical reference SAR values of a SPEAG validation dipoles placed below the flat phantom filled with body-tissue simulating liquid are given. The reference SAR values were calculated using the finite-difference time-domain method and the geometry parameters.

Dipole Type	Distance (mm)	Frequency (MHz)	SAR (1g) [W/kg]	SAR (10g) [W/kg]	SAR (peak) [W/kg]
D450V2	15	450	5.01	3.36	7.22
D835V2	15	850	<mark>9.71</mark>	<mark>6.38</mark>	14.1
D900V2	15	900	11.1	7.17	16.3
D1450V2	10	1450	29.6	16.6	49.8
D1800V2	10	1800	38.5	20.3	67.5
D1900V2	10	1900	<mark>39.8</mark>	<mark>20.8</mark>	69.6
D2000V2	10	2000	40.9	21.2	71.5
D2450V2	10	2450	51.2	23.7	97.6

Note: All SAR values normalized to 1 W forward power.

6.1 SYSTEM PERFORMANCE CHECK RESULTS

System Validation Dipole: D835V2 SN:4d002

Date: December 7, 2005

Ambient Temperature = 22°C; Relative humidity = 30%

Measured by: Ninous Davoudi

Musc	uscle Simulating Liquid Mrasured		Target .	Deviation[%]	Limit [%]		
f(MHz)	Temp.[°C]	Depth [cm]	1 g	Normalized to 1 W	Target_1g	Deviation[%]	L III II [//]
			2.39	9.56	9.71	-1.54	± 10
835	21.8	15	10g	Normalized to 1 W	Target_10g	Deviation[%]	Limit [%]
			1.57	6.28	6.38	-1.57	± 10

Date: December 8, 2005

Ambient Temperature = 22.5°C; Relative humidity = 30%

Measured by: Ninous Davoudi

Musc	scle Simulating Liquid Mrasured			Target_1g	Deviation[%]	Limit [%]	
f(MHz)	Temp.[°C]	Depth [cm]	1 g	Normalized to 1 W	Target_1g	Deviation[%]	L III II [70]
			2.38	9.52	9.71	-1.96	± 10
835	22	15	10g	Normalized to 1 W	Target_10g	Deviation[%]	Limit [%]
			1.56	6.24	6.38	-2.19	± 10

System Validation Dipole: D1900V2 SN:5d043

Date: December 7, 2005

Ambient Temperature = 22°C; Relative humidity = 30%

Measured by: Ninous Davoudi

Musc	Muscle Simulating Liquid			Mrasured	Target	Doviation[%]	Limit [%]	
f(MHz)	Temp.[°C]	Depth [cm]	1 g	Normalized to 1 W	Target_1g Deviation[9			
			9.17	36.68	39.8	-7.84	± 10	
1900	21.2	15	10g	Normalized to 1 W	Target_10g	Deviation[%]	Limit [%]	
			4.84	19.36	20.8	-6.92	± 10	

Date: December 8, 2005

Ambient Temperature = 22.5°C; Relative humidity = 30%

Muscl	Muscle Simulating Liquid			Mrasured	Target_1g	Deviation[%]	Limit [%]	
f(MHz)	Temp.[°C]	Depth [cm]	1 g	Normalized to 1 W	Target_1g			
			9.62	38.48	39.8	-3.32	± 10	
1900	22	15	10g	Normalized to 1 W	Target_10g	Deviation[%]	Limit [%]	
			5.09	20.36	20.8	-2.12	± 10	

7 SAR MEASUREMENT PROCEDURE

A summary of the procedure follows:

- a) A measurement of the SAR value at a fixed location is used as a reference value for assessing the power drop of the EUT. The SAR at this point is measured at the start of the test, and then again at the end of the test.
- b) The SAR distribution at the exposed flat section of the flat phantom is measured at a distance of 2.5 mm from the inner surface of the shell. The area covers the entire dimension of the EUT and the horizontal grid spacing is 15 mm x 15 mm. Based on this data, the area of the maximum absorption is determined by Spine interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.
- c) Around this point, a volume of X=Y=Z=30 mm is assessed by measuring 5 x 5 x 7 mm points. On the basis of this data set, the spatial peak SAR value is evaluated with the following procedure:
 - (i) The data at the surface are extrapolated, since the centre of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation is based on a least square algorithm. A polynomial of the fourth order is calculated through the points in z-axes. This polynomial is then used to evaluate the points between the surface and the probe tip.
 - (ii) The maximum interpolated value is searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g and 10 g) are computed using 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-direction). The volume is integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) are interpolated to calculate the averages.
 - (iii) All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.
 - (iv) The SAR value at the same location as in Step (a) is again measured to evaluate the actual power drift.

DASY4 SAR MEASUREMENT PROCEDURE

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The Minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the Distance of sensor calibration points to probe tip as defined in the probe properties (for example, 1.2 mm for an EX3DV3 probe type).

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY4 software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528, EN 50361 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures $5 \times 5 \times 7$ mm points within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

Step 5: Z-Scan

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a onedimensional grid. In order to get a reasonable extrapolation, the extrapolated distance should not be larger than the step size in Z-direction.

8 PROCEDURES USED TO ESTABLISH TEST SIGNAL

The manufacturer supplied a special driving program (Procomm Plus) by using the following commands to turn the transmitter on and change the channels and bands:

MC8755_TX_GSM850_xxx

MC8755_TX_EDGE850_xxx

MC8755_TX_GSM1900_xxx

MC8755_TX_EDGE1900_xxx

Conducted powers were measured prior to SAR measurement.

GSM850 [GPRS Class: Class 10 (2 slot)] & WCDMA850

The cable assembly insertion loss of 10.58 dB (including 9.81 dB pad and 0.77dB cable) was entered as an offset in the power meter to allow for direct reading of power.

GPRS mode:		
		Conducted Power
Ch	f (MHz)	Avg Power
128	824.2	31.93
192	837.0	32.07
251	848.8	31.78
EGPRS (EDGE) m	ode:	
		Conducted Power
Ch	f (MHz)	Avg Power
128	824.2	26.75
192	837.0	26.77
251	848.8	26.91

GSM190 [GPRS Class: Class 10 (2 slot)] & WCDMA1900

The cable assembly insertion loss of 10.7 dB (including 10.02 dB pad and 0.86 dB cable) was entered as an offset in the power meter to allow for direct reading of power.

GPRS mode:		
		Conducted Power
Ch	f (MHz)	Avg Power
512	1850.20	29.12
661	1880.00	28.95
810	1909.80	29.90
EGPRS (EDGE) m	ode:	
		Conducted Power
Ch	f (MHz)	Avg Power
512	1850.20	26.01
661	1880.00	25.65
810	1909.80	25.44

9 SAR TEST SUMMARY @ 850 MHZ BNAD

9.1 14" LENOVO

Photos are confidential, please see a seperate file

GSM850

GSINOSU						
			Measured	Power Drift	Extrapolated	
Test mode	Channel	f (MHz)	1g (mW/g)	(dB)	1g (mW/g)	Limit (mW/g)
	128	824.2	0.058	-0.128	0.060	1.6
GPRS	192	837.0	0.079	0.000	0.079	1.6
	251	848.8	0.083	-0.010	0.083	1.6
	251 ⁴⁾	848.8	0.087	-0.086	0.089	1.6
	128	824.2				
EGPRS	192	837.0	0.024	-0.053	0.025	1.6
	251	848.8				

Notes:

The exact method of extrapolation is *measured SAR x 10[^]* (-*drift/10*). The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.

2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.

3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

4) Co-location with WLAN Atheros FCC ID: PPD-AR5BXB6

9.2 15" LENOVO

Photos are confidential, please see a seperate file

GSM850

00111000						
			Measured	Power Drift	Extrapolated	
Test mode	Channel	f (MHz)	1g (mW/g)	(dB)	1g (mW/g)	Limit (mW/g)
	128	824.2	0.0422	0.000	0.042	1.6
GPRS	192	837.0	0.0423	0.000	0.042	1.6
	251	848.8	0.0507	-0.004	0.051	1.6
	251 ⁴⁾	848.8	0.0537	-0.016	0.054	1.6
	128	824.2				
EGPRS	192	837.0	0.0150	0.000	0.015	1.6
	251	848.8				

Notes:

 The exact method of extrapolation is *measured SAR x 10[^]* (-*drift/10*). The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.

2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.

3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

4) Co-location with WLAN Atheros FCC ID: PPD-AR5BXB6

10 SAR TEST SUMMARY @ 1900 MHZ BNAD

10.1 14" LENOVO

Photos are confidential, please see a seperate file

GSM1900

03111900						
			Measured	Power Drift	Extrapolated	
Test mode	Channel	f (MHz)	1g (mW/g)	(dB)	1g (mW/g)	Limit (mW/g)
	512	1850.20	0.049	-0.073	0.049	1.6
GPRS	661	1880.00	0.046	-0.034	0.046	1.6
	810	1909.80	0.065	0.000	0.065	1.6
	810 ⁴⁾	1909.80	0.067	0.000	0.067	1.6
	812	1850.20				
EGPRS	661	1880.00	0.026	0.000	0.026	1.6
	810	1909.80				

Notes:

 The exact method of extrapolation is *measured SAR x 10[^]* (-*drift/10*). The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.

2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.

3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

4) Co-location with WLAN Atheros FCC ID: PPD-AR5BXB6.

10.2 15" LENOVO

Photos are confidential, please see a seperate file

GSM1900

			Measured	Power Drift	Extrapolated				
Test mode	Channel	f (MHz)	1g (mW/g)	(dB)	1g (mW/g)	Limit (mW/g)			
	512	1850.20	0.0332	-0.062	0.034	1.6			
GPRS	661	1880.00	0.0233	0.000	0.023	1.6			
	810	1909.80	0.0200	-0.131	0.021	1.6			
	512 ⁴⁾	1850.20	0.0361	-0.135	0.037	1.6			
	812	1850.20							
EGPRS	661	1880.00	0.0188	-0.050	0.019	1.6			
	810	1909.80							

Notes:

 The exact method of extrapolation is *measured SAR x 10[^]* (*-drift/10*). The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.

2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.

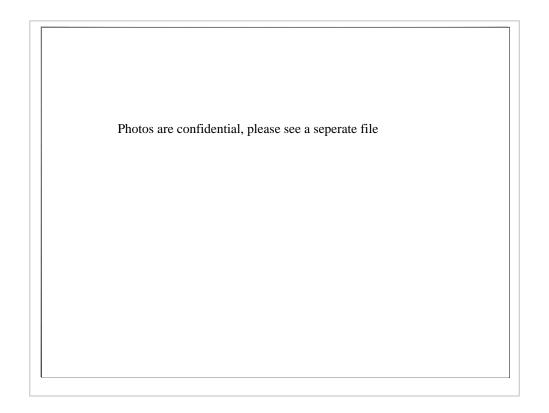
3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

4) Co-location with WLAN Atheros FCC ID: PPD-AR5BXB6.

11 **PHOTO**

11.1 EUT

Photos are confidential, please see a seperate file

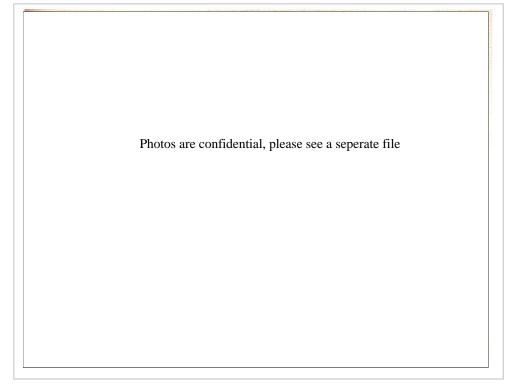


11.2 HOST DEVICE

LENOVO 14 INCH

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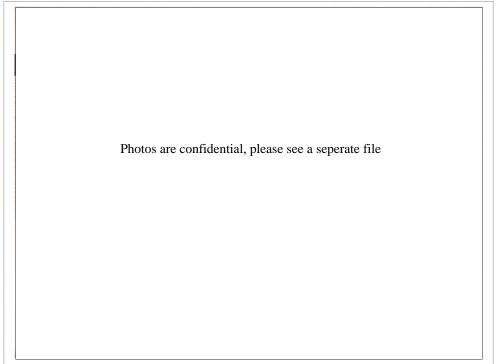
LENOVO 15 INCH



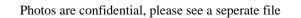
LENOVO 14 INCH

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LENOVO 15 INCH



LENOVO 14 INCH

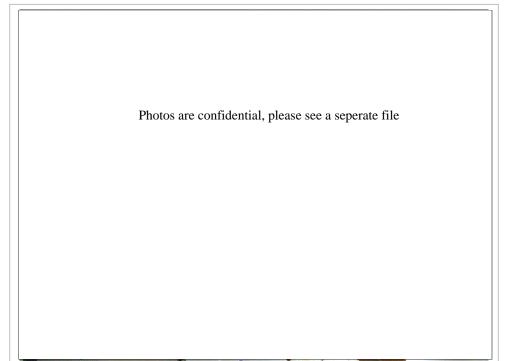


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LENOVO 14 INCH

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LENOVO 15 INCH



12 MEASUREMENT UNCERTAINTY

Uncertainty component	Tel (+9/)	Probe	Div.	$C(4\pi)$	Ci (10g)	Std. Unc.(±%)	
Uncertainty component	Tol. (±%)	Dist.	Div.	Ci (1g)		Ui (1g)	Ui(10g)
Measurement System							
Probe Calibration	4.80	Ν	1	1	1	4.80	4.80
Axial Isotropy	4.70	R	1.732	0.707	0.707	1.92	1.92
Hemispherical Isotropy	9.60	R	1.732	0.707	0.707	3.92	3.92
Boundary Effects	1.00	R	1.732	1	1	0.58	0.58
Linearity	4.70	R	1.732	1	1	2.71	2.71
System Detection Limits	1.00	R	1.732	1	1	0.58	0.58
Readout Electronics	1.00	Ν	1	1	1	1.00	1.00
Response Time	0.80	R	1.732	1	1	0.46	0.46
Integration Time	2.60	R	1.732	1	1	1.50	1.50
RF Ambient Conditions - Noise	1.59	R	1.732	1	1	0.92	0.92
RF Ambient Conditions - Reflections	0.00	R	1.732	1	1	0.00	0.00
Probe Positioner Mechnical Tolerance	0.40	R	1.732	1	1	0.23	0.23
Probe Positioning With Respect to Phantom Shell	2.90	R	1.732	1	1	1.67	1.67
Extrapolation, interpolation, and integration algorithms for							
max. SAR evaluation	3.90	R	1.732	1	1	2.25	2.25
Test sample Related							
Test Sample Positioning	1.10	Ν	1	1	1	1.10	1.10
Device Holder Uncertainty	3.60	Ν	1	1	1	3.60	3.60
Power and SAR Drift Measurement	5.00	R	1.732	1	1	2.89	2.89
Phantom and Tissue Parameters							
Phantom Uncertainty	4.00	R	1.732	1	1	2.31	2.31
Liquid Conductivity - Target	5.00	R	1.732	0.64	0.43	1.85	1.24
Liquid Conductivity - Meas.	8.60	N	1	0.64	0.43	5.50	3.70
Liquid Permittivity - Target	5.00	R	1.732	0.6	0.49	1.73	1.41
Liquid Permittivity - Meas.	3.30	Ν	1	0.6	0.49	1.98	1.62
Combined Standard Uncertainty	RSS		11.44	10.49			
Expanded Uncertainty (95% Confidence Interval)			K=2			22.87	20.98
Notesfor table							
1. Tol tolerance in influence quaitity							
2. N - Nomal							
2 B. Bostongular							

3. R - Rectangular

4. Div. - Divisor used to obtain standard uncertainty

5. Ci - is te sensitivity coefficient

13 EQUIPMENT LIST

Name of Equipment	Manufacturer	Type/Model	Serial Number	Cal. Due date
Robot - Six Axes	Stäubli	RX90BL	N/A	N/A
Robot Remote Control	Stäubli	CS7MB	3403-91535	N/A
DASY4 Measurement Server	SPEAG	SEUMS001BA	1041	N/A
Probe Alignment Unit	SPEAG	LB (V2)	261	N/A
S-Parameter Network Analyzer	Agilent	8753ES-6	US39173569	2/9/07
Electronic Probe kit	Hewlett Packard	85070C	N/A	N/A
E-Field Probe	SPEAG	EX3DV3	3531	7/21/06
SAM Phantom (SAM1)	SPEAG	TP-1185	QD000P40CA	N/A
SAM Phantom (SAM2)	SPEAG	TP-1015	N/A	N/A
Data Acquisition Electronics	SPEAG	DAE3 V1	500	2/7/06
System Validation Dipole	SPEAG	D835V2	4d002	2/11/06
System Validation Dipole	SPEAG	D1900V2	5d043	2/16/06
Signal General	R&H	SMP 04	DE34210	6/2/06
Power Meter	Giga-tronics	8651A	8651404	12/27/06
Power Sensor	Giga-tronics	80701A	1834588	12/27/07
Amplifier	Mini-Circuits	ZVE-8G	0360	N/A
Amplifier	Mini-Circuits	ZHL-42W	D072701-5	N/A
Simulating Liquid	CCS	M835	N/A	Within 24 hrs of first test
Simulating Liquid	CCS	M1900	N/A	Within 24 hrs of first test

14 ATTACHMENT

No.	Contents	No. of page (s)
1	System Performance Check Plot	8
2-1	SAR Test Plot – 14" Lenovo	12
2-2	SAR Test Plot – 15" Lenovo	12
3	Certificate of E-filed Probe EX3DV4 SN 3531	10
4	Certificate of System Validation Dipole D835V2 SN 4d002	6
5	Certificate of System Validation Dipole D1900V2 SN 5d043	6

END OF REPORT