Specific Absorption Rate (SAR) Test Report
for
Novatel Wireless Technologies, LTD
on the
PC Card
Models NRM-G2000
FCC ID: NBZNRM-G2000

Test Report: 20421981
Date of Report: March 2, 2001

Total number of pages in report: 23 + Data Sheets

NVLAP Laboratory Code 200201-0
Accredited for testing to FCC Parts 15

Tested by:	Xi-Ming Yang for	Review Date: 03/05/01
Reviewed by: David Chernomordik	David Chernomordik	Review Date: 03/05/01

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1.0 Job description

1.1 Client Information

The EUT has been tested at the request of:

Company:	Novatel Wireless Technologies, LTD.
Address:	Suite 200, 6715 – 8th Street NE
	Calary, Alberta
Zip	T2E7H7
	Canada
Name of contact:	Mr. Kevin Goodfellow
Telephone:	+1 (404) 2954809

1.2 Equipment under test (EUT)

Product Descriptions:

Equipment	PC Card		
Trade Name	Novatel Wireless Technologies, LTD	Model No.	NRM-G2000
FCC ID	NBZNRM-G2000	S/N No.	Not Labeled
Category	Portable	RF Exposure	Uncontrolled Environment
Frequency Band (uplink)	1850-1910	System	GSM

EUT Antenna Description			
Type	Monopole	Configuration	Removeable 360° Rotation
Dimensions	10 cm (Length)	Gain	1 dBi
Location	Right		

Use of Product : Portable personal communications

Manufacturer: SAME as above.

Production is planned: [X] Yes, [ ] No

EUT receive date: February 18, 2001

EUT received condition: Good condition prototype

Test start date: February 28, 2001

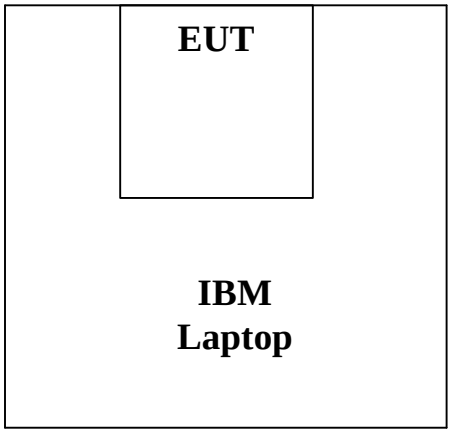
Test end date: February 28, 2001

2.0 Test plan reference

FCC rule part 2.1093, FCC Docket 96-326 & Supplement C to OET Bulletin 65

2.1 System test configuration

2.1.1 System block diagram & Support equipment



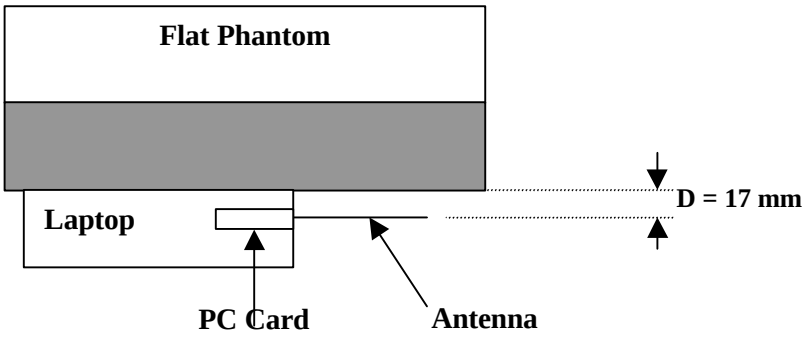
2.2 Test Position

Three test configurations were used to show compliance with the FCC RF human exposure requirements. In all configurations, the NRM-G2000 was configured for testing in a typical fashion (as a customer would normally use it). Due to the application and usage of the product, SAR measurements with the human head region are not necessary. Table 1 below describes the setup and condition:

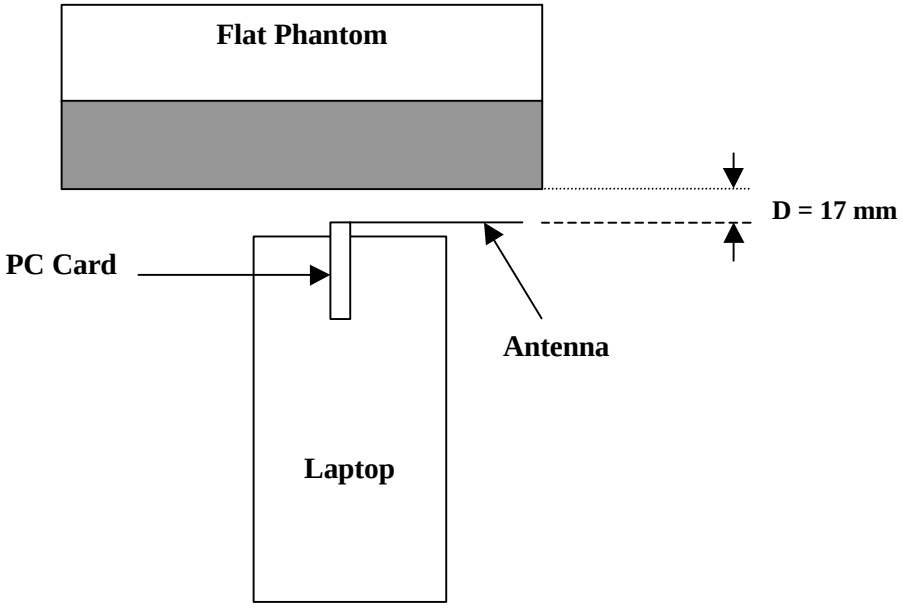
Table 1, Equipment Setup

Configuration	**Description**
A	• Antenna in horizontal position, 17 mm distance from antenna to Phantom. • Simulating close proximity of human body.
B	• Antenna in horizontal position, 17 mm distance from antenna to Phantom. EUT is in vertical position. • Simulating close proximity of human body.

2.2 Test Position (Continued)



Configuration A



Configuration B

2.3 Test Condition

During tests, the worst case data (max RF coupling) was determined with following conditions:

EUT Antenna	Fixed	Orientation	Normal
Usage	A: Face-down B: Vertical	Distance between antenna axis at the joint and the liquid surface:	17 mm, Position: face-down 17 mm, Position: vertical
Simulating human hand	Not Used	EUT Battery	Powered by Host Computer
Power output	29.7 dBm at 1850.2 MHz 29.5 dBm at 1880 MHz 29.1 dBm at 1909.8 MHz		

The spatial peak SAR values were accessed for lowest, middle and highest operating channels defined by the manufacturer. Tests were performed in GSM mode.

2.4 Modifications required for compliance

No modifications were implemented by Intertek Testing Services.

2.5 Additions, deviations and exclusions from standards

No additions, deviations or exclusions have been made from standard.

3.0 SAR EVALUATION

3.1 SAR Limits

The following FCC limits for SAR apply to devices operate in General Population/Uncontrolled Exposure environment:

EXPOSURE (General Population/Uncontrolled Exposure environment)	**SAR (W/kg)**
Average over the whole body	0.08
Spatial Peak (1g)	1.60
Spatial Peak for hands, wrists, feet and ankles (10g)	4.00

3.2 Configuration Photographs

SAR measurement Test Setup

3.2 Configuration Photographs – Continued

SAR Measurement Test Setup

3.2 Configuration Photographs – Continued

SAR Measurement Test Setup

3.2 Configuration Photographs – Continued

SAR Measurement Test Setup

3.3 System Verification

Prior to the assessment, the system was verified to the ±5% of the specifications by using the system validation kit. The validation was performed at 900 MHz.

Validation kit	Targeted SAR_{1g} (mW/g)	Measured SAR_{1g} (mW/g)
D900V2, S/N #: 013	3.92	3.87

3.4 Evaluation Procedures

The SAR evaluation was performed with the following procedures:

a. SAR was measured at a fixed location above the ear point and used as a reference value for the assessing the power drop.
b. The SAR distribution at the exposed side of the head was measured at a distance of 4.0 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20 mm x 20 mm. Based on this data, the area of the maximum absorption was determined by spline interpolation.
c. 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 with the following procedure:

    I) 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 measurement point is 1.6 mm. The extrapolation was based on a least square algorithm. 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.

    ii) The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3-D spline interpolation algorithm. The 3-D spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y and z directions). The volume was integrated with the trapezoidal algorithm. 1000 points (10 x 10 x 10) were interpolated to calculate the average.
    iii) All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

d. Re-measurement of the SAR value at the same location as in step a. above. If the value changed by more than 5 %, the evaluation was repeated.

4.0 Test Results

The results on the following page(s) were obtained when the device was tested in the condition described in this report. Detail measurement data and plots which reveal information about the location of the maximum SAR with respect to the device, are reported in Appendix A.

Trade Name:	Novatel Wireless Technologies, LTD	**Model No.:**	NRM-G2000
Serial No.:	Not Labeled	**Test Engineer:**	Xi-Ming Yang

TEST CONDITIONS			
Ambient Temperature	21.6 °C	Relative Humidity	40 %
Test Signal Source	Test Mode	Signal Modulation	GSM
Output Power Before SAR Test	29.7 dBm	Output Power After SAR Test	29.7 dBm
Test Duration	23 Min.	Number of Battery Change	Powered by host computer

EUT Position: Face-down					
Channel MHz	Operating Mode	Duty Cycle ratio	Antenna Position From Phantom	Measured SAR_{1g} (mW/g)	Plot Number
1850.2	GSM	8	17 mm	0.512	1
1880	GSM	8	17 mm	0.493	2
1909.2	GSM	8	17 mm	0.445	3

EUT Position: Vertical					
Channel MHz	Operating Mode	Duty Cycle ratio	Antenna Position From Phantom	Measured SAR_{1g} (mW/g)	Plot Number
1850.2	GSM	8	17 mm	0.458	4
1880	GSM	8	17 mm	0.459	5
1909.2	GSM	8	17 mm	0.428	6

Note: a) Worst case data were reported
b) Duty cycle factor not included in the measured SAR data
c) Uncertainty of the system is not included

5.0 EQUIPMENT

5.1 Equipment List

The Specific Absorption Rate (SAR) tests were performed with the SPEAG model DASY 3 automated near-field scanning system, which is a package, optimized for dosimetric evaluation of mobile radios [3]. The following major equipment/components were used for the SAR evaluations:

SAR Measurement System			
EQUIPMENT	SPECIFICATIONS	S/N #	CAL. DATE
Robot	**Stäubi RX60L**	597412-01	N/A
	Repeatability: ± 0.025mm Accuracy: 0.806×10^{-3} degree Number of Axes: 6		
E-Field Probe	**ET3DV5**	1333	04/10/00
	Frequency Range: 10 MHz to 6 GHz Linearity: ± 0.2 dB Directivity: ± 0.1 dB in brain tissue		
Data Acquisition	**DAE3**	317	N/A
	Measurement Range: 1µV to >200mV Input offset Voltage: < 1µV (with auto zero) Input Resistance: 200 M		
Phantom	**Generic Twin V3.0**	N/A	N/A
	Type: Generic Twin, Homogenous Shell Material: Fiberglass Thickness: 2 ± 0.1 mm Capacity: 20 liter Ear spacer: 4 mm (between EUT ear piece and tissue simulating liquid)		
Simulated Tissue	**Mixture**	N/A	02/17/01
	Please see section 6.2 for details		
Power Meter	**HP 8900D** w/ 84811A sensor	3607U00673	08/01/00
	Frequency Range: 100kHz to 18 GHz Power Range: 300µW to 3W		

5.2 Tissue Simulating Liquid

Brain	
Ingredient	**Frequency** (800 – 900 MHz)
Water	40.3 %
Sugar	56.0 %
Salt	2.5 %
HEC	1.0 %
Bactericide	0.2 %

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	$_r$ *	*(mho/m)	**(kg/m$^{3)}$
835	46.1 ± 5%	0.74 ± 10%	1000
915	45.7 ± 5%	0.77 ± 10%	1000

* *worst case uncertainty of the HP 85070A dielectric probe kit*
** *worst case assumption*

Brain	
Ingredient	**Frequency** (1900 MHz)
Water	53.93 %
Sugar	44.97 %
Salt	0 %
HEC	1.0 %
Bactericide	0.1 %

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	$_r$ *	*(mho/m)	**(kg/m$^{3)}$
1900	43.4 ± 5%	1.2 ± 10%	1000

* *worst case uncertainty of the HP 85070A dielectric probe kit*
** *worst case assumption*

Muscle	
Ingredient	**Frequency** (800 – 900 MHz)
Water	54.05 %
Sugar	45.05 %
Salt	0.1 %
Bactericide	0.8%

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	$_r$ *	*(mho/m)	**(kg/m$^{3)}$
835	51.1± 5%	0.88 ± 10%	1000

* *worst case uncertainty of the HP 85070A dielectric probe kit*
** *worst case assumption*

Muscle	
Ingredient	**Frequency** (1900 MHz)
Water	55.5 %
Sugar	43.5 %
Salt	0 %
Cellulose	1.0 %

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	$_r$ *	*(mho/m)	**(kg/m$^{3)}$
1900	52.1 ± 5%	1.69 ± 10%	1000

* *worst case uncertainty of the HP 85070A dielectric probe kit*
** *worst case assumption*

Note: The amounts of each ingredient specified in the tables are not the exact amounts of the final test solution. The final test solution was adjusted by adding small amounts of water, sugar, and/or salt to calibrate the solution to meet the proper dielectric parameters.

5.3 E-Field Probe Calibration

Probes were calibrated by the manufacturer in the TEM cell ifi 110. To ensure consistency, a strict protocol was followed. The conversion factor (ConF) between this calibration and the measurement in the tissue simulation solution was performed by comparison with temperature measurement and computer simulations. Probe calibration factors are included in Appendix B.

5.5 Measurement Uncertainty

The uncertainty budget has been determined for the DASY3 measurement system according to the NIS81 [5] and the NIST 1297 [6] documents and is given in the following table. The extended uncertainty (K=2) was assessed to be 23.5 %

UNCERTAINTY BUDGET				
Uncertainty Description	**Error**	**Distrib.**	**Weight**	**Std.Dev.**
Probe Uncertainty				
Axial isotropy	±0.2 dB	U-shape	0.5	±2.4 %
Spherical isotropy	±0.4 dB	U-shape	0.5	±4.8 %
Isotropy from gradient	±0.5 dB	U-shape	0	
Spatial resolution	±0.5 %	Normal	1	±0.5 %
Linearity error	±0.2 dB	Rectang.	1	±2.7 %
Calibration error	±3.3 %	Normal	1	±3.3 %
SAR Evaluation Uncertainty				
Data acquisition error	±1 %	Rectang.	1	±0.6 %
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %
Conductivity assessment	±10 %	Rectang.	1	±5.8 %
Spatial Peak SAR Evaluation Uncertainty				
Extrapol boundary effect	±3 %	Normal	1	±3 %
Probe positioning error	±0.1 mm	Normal	1	±1 %
Integrat. And cube orient	±3 %	Normal	1	±3 %
Cube shape inaccuracies	±2 %	Rectang.	1	±1.2 %
Device positioning	±6 %	Normal	1	±6 %
Combined Uncertanties				**±11.7 %**

5.5 Measurement Traceability

All measurements described in this report are traceable to National Institute of Standards and Technology (NIST) standards or appropriate national standards.

6.0 WARNING LABEL INFORMATION - USA

See attached users manual.

7.0 REFERENCES

[1] ANSI, *ANSI/IEEE C95.1-1991: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 Ghz*, The Institute of electrical and Electronics Engineers, Inc., New York, NY 10017, 1992

[2] Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997

[3] Thomas Schmid, Oliver Egger, and Niels Kuster, "Automated E-field scanning system for dosimetric assessments", *IEEE Transaction on Microwave Theory and Techniques*, vol. 44, pp. 105-113, Jan. 1996.

[4] Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetic evaluation of mobile communications equipment with know precision", IEICE Transactions on Communications, vol. E80-B, no. 5, pp.645-652, May 1997.

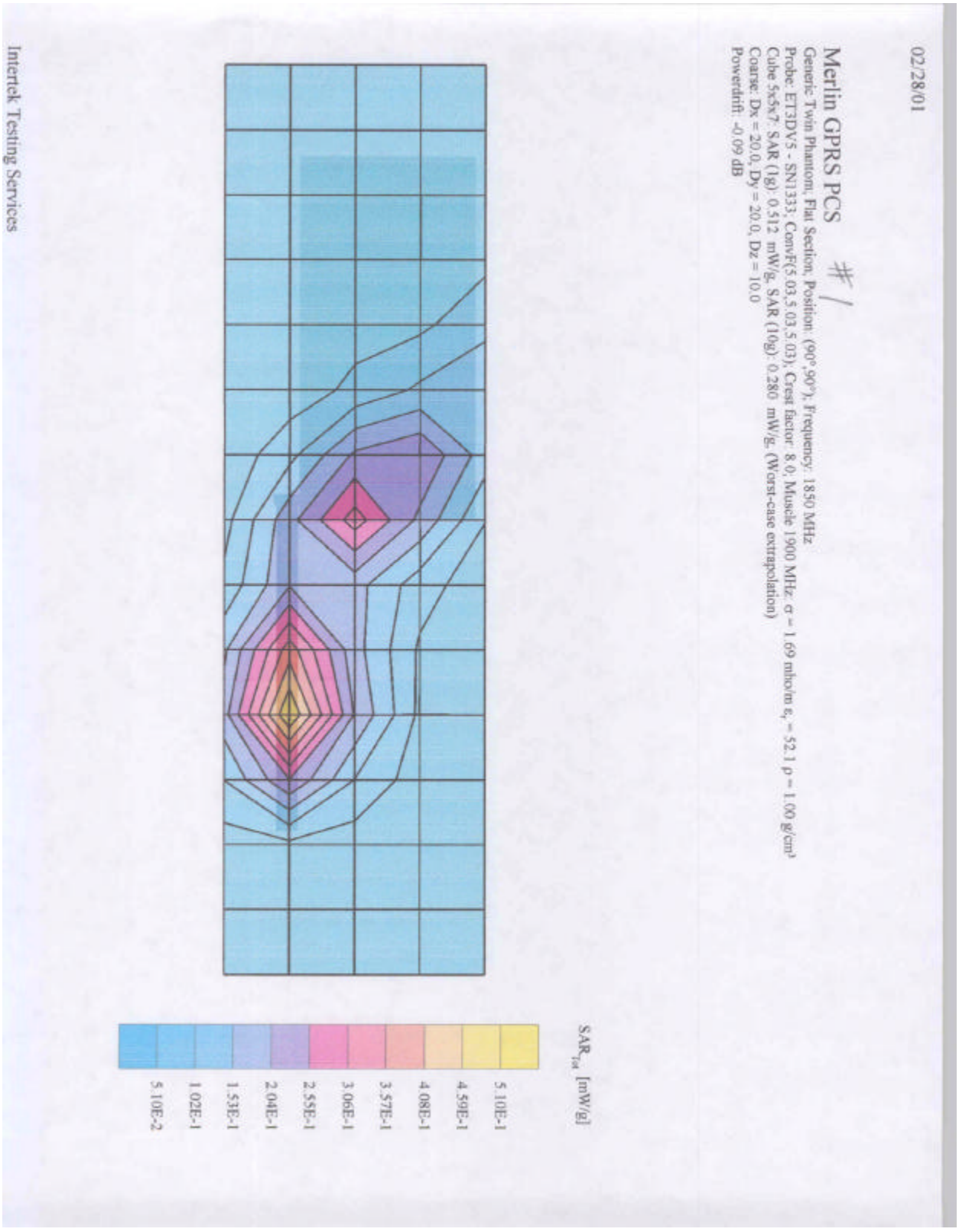
[5] NIS81, NAMAS, "The treatment of uncertainty in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddinton, Middlesex, England, 1994.

[6] Barry N. Tayor and Chris E. Kuyatt, "Guidelines for evaluating and expressing the uncertainty of NIST measurement results", Tech. Rep., National Institude of Standards and Technology, 1994.

APPENDIX A - SAR Evaluation Data

Please note that the graphical visualization of the EUT position onto the SAR distribution gives only limited information on the current distribution of the device, since the curvature of the head results in graphical distortion. Full information can only be obtained either by H-field scans in free space or SAR evaluation with a flat phantom.

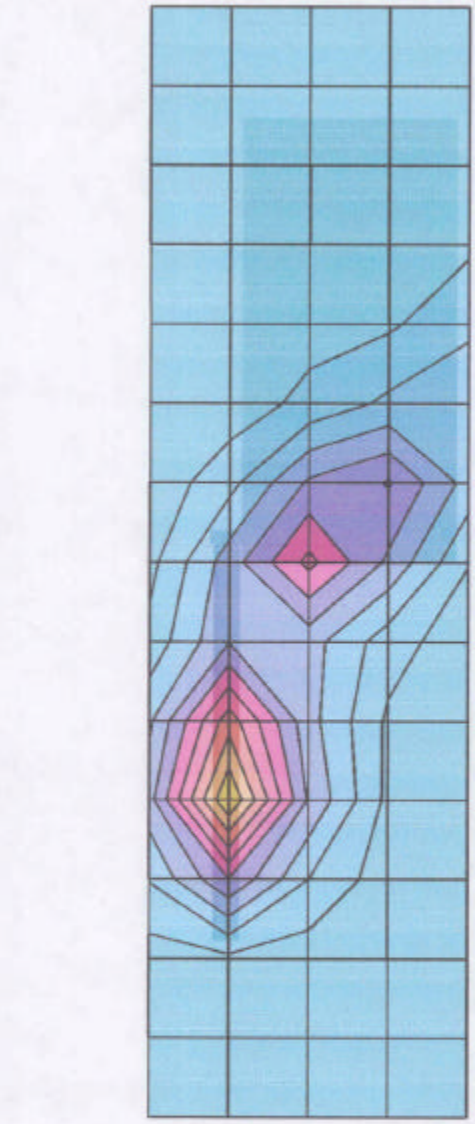
Powerdrift is the measurement of power drift of the device over one complete SAR scan.


02/28/01
Merlin GPRS PCS #1
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1850 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m ε_r = 52.1 ρ = 1.00 g/cm³
Cube 5x5x7: SAR (1g): 0.512 mW/g, SAR (10g): 0.280 mW/g, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.09 dB
Intertek Testing Services
SAR_tot [mW/g]
5.10E-1
4.59E-1
4.08E-1
3.57E-1
3.06E-1
2.55E-1
2.04E-1
1.53E-1
1.02E-1
5.10E-2

02/28/01

Merlin GPRS PCS #2

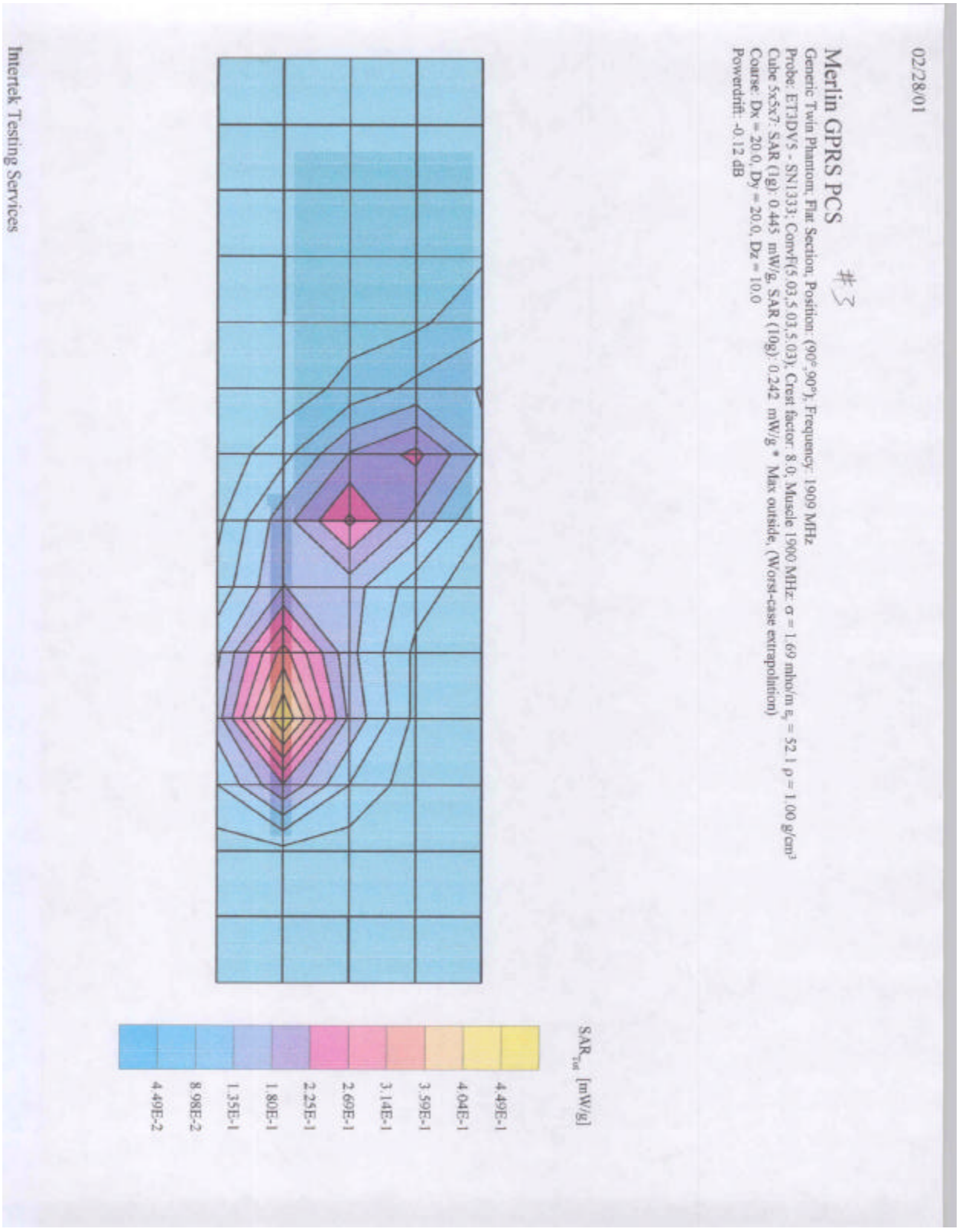
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1880 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m ε_r = 52.1 ρ = 1.00 g/cm^3
Cube 5x5x7: SAR (1g): 0.493 mW/g, SAR (10g): 0.269 mW/g, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.00 dB

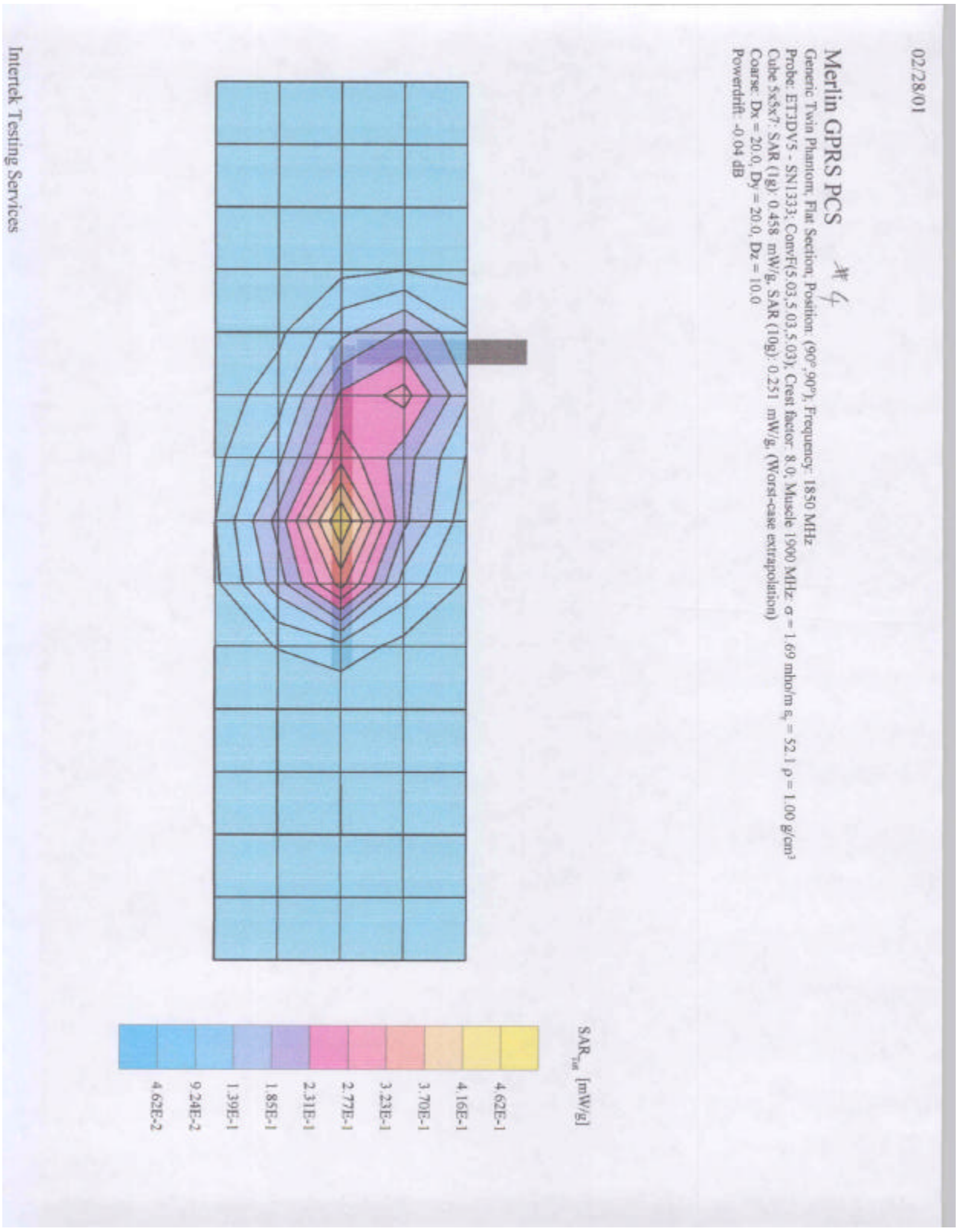


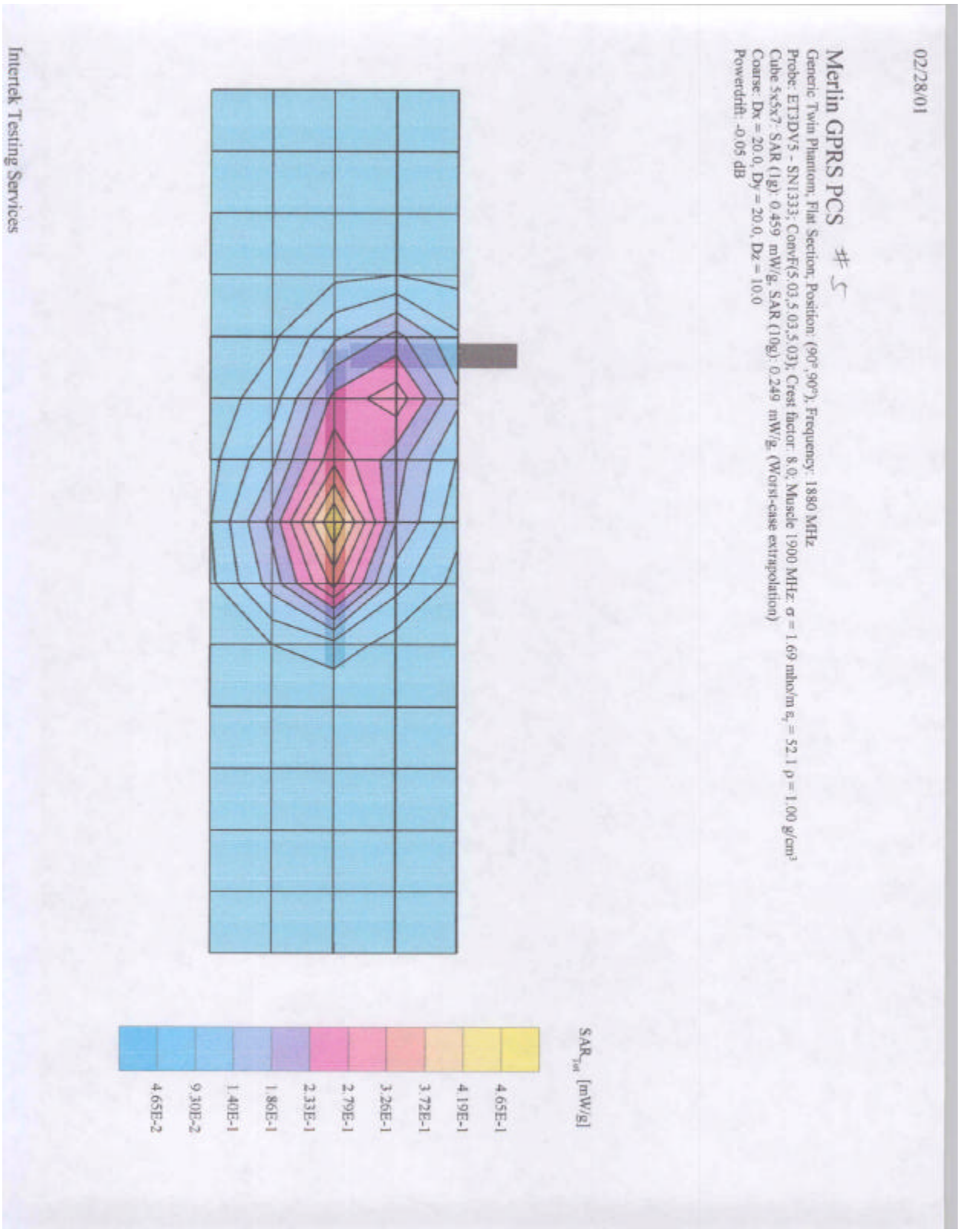
SAR_{1g} [mW/g]

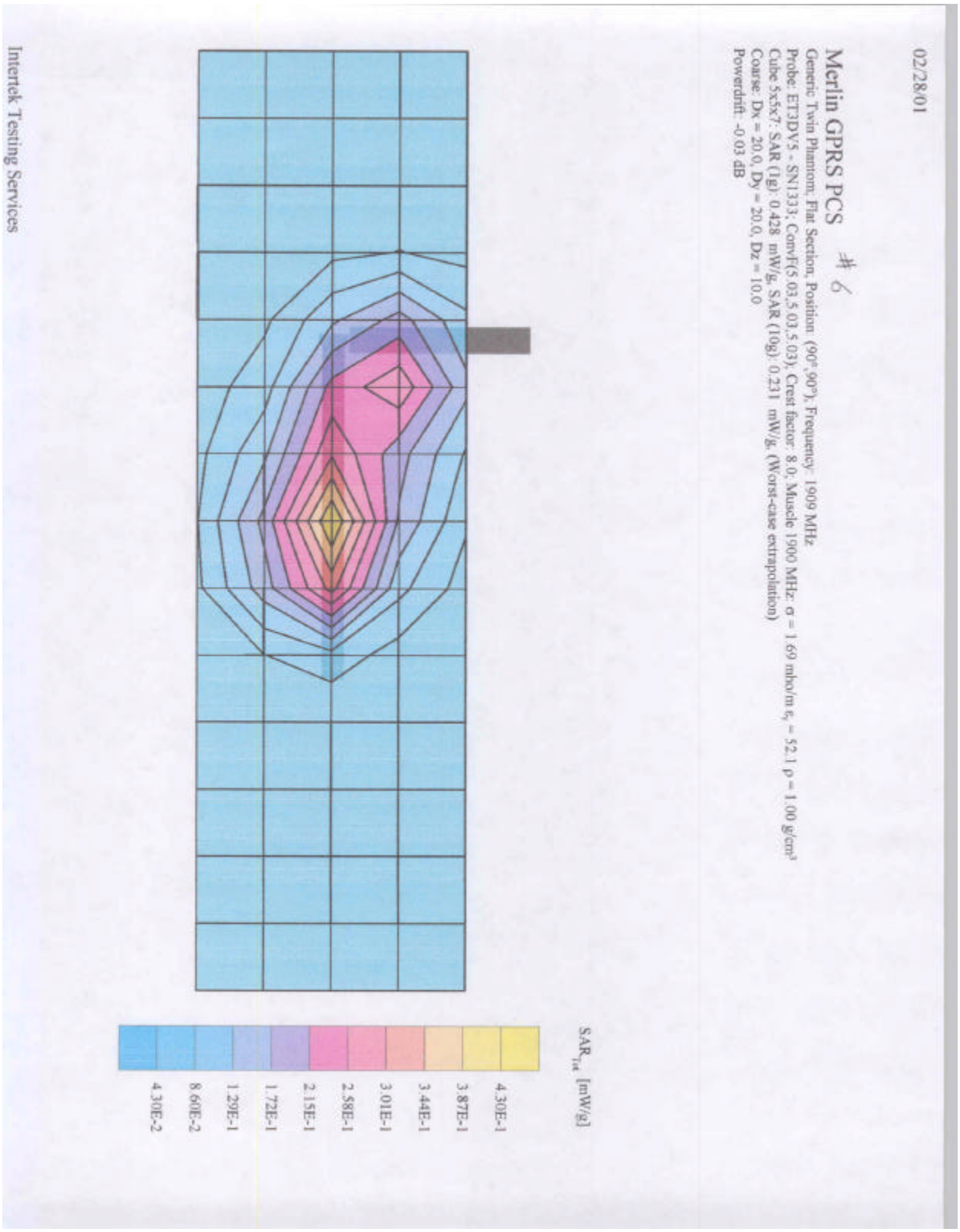
4.92E-1
4.43E-1
3.94E-1
3.44E-1
2.95E-1
2.46E-1
1.97E-1
1.48E-1
9.84E-2
4.92E-2

Intertek Testing Services


02/28/01
Merlin GPRS PCS #3
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1909 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m ε_r = 52.1 ρ = 1.00 g/cm³
Cube 5x5x7: SAR (1g): 0.445 mW/g, SAR (10g): 0.242 mW/g * Max outside, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.12 dB
Intertek Testing Services
SAR_tot [mW/g]
4.49E-1
4.04E-1
3.59E-1
3.14E-1
2.69E-1
2.25E-1
1.80E-1
1.35E-1
8.98E-2
4.49E-2


02/28/01
Merlin GPRS PCS #4
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1850 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m εr = 52.1 ρ = 1.00 g/cm³
Cube 5x5x7: SAR (1g): 0.458 mW/g, SAR (10g): 0.251 mW/g, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.04 dB
Intertek Testing Services
SAR tot [mW/g]
4.62E-1
4.16E-1
3.70E-1
3.23E-1
2.77E-1
2.31E-1
1.85E-1
1.39E-1
9.24E-2
4.62E-2


02/28/01
Merlin GPRS PCS #5
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1880 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m ε_r = 52.1 ρ = 1.00 g/cm³
Cube 5x5x7: SAR (1g): 0.459 mW/g, SAR (10g): 0.249 mW/g, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.05 dB
Intertek Testing Services
SAR_tot [mW/g]
4.65E-1
4.19E-1
3.72E-1
3.26E-1
2.79E-1
2.33E-1
1.86E-1
1.40E-1
9.30E-2
4.65E-2


02/28/01
Merlin GPRS PCS #6
Generic Twin Phantom; Flat Section; Position: (90°,90°); Frequency: 1909 MHz
Probe: ET3DV5 - SN1333; ConvF(5.03,5.03,5.03); Crest factor: 8.0; Muscle 1900 MHz: σ = 1.69 mho/m εr = 52.1 ρ = 1.00 g/cm³
Cube 5x5x7: SAR (1g): 0.428 mW/g, SAR (10g): 0.231 mW/g, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.03 dB
Intertek Testing Services
SAR1g [mW/g]
4.30E-1
3.87E-1
3.44E-1
3.01E-1
2.58E-1
2.15E-1
1.72E-1
1.29E-1
8.60E-2
4.30E-2

APPENDIX B - E-Field Probe Calibration Data
See attached pages.

Schmid & Partner
Engineering AG

Staffelstrasse 8, 8045 Zurich, Switzerland, Telefon +41 1 280 08 60, Fax +41 1 280 08 64

Calibration Certificate

Dosimetric E-Field Probe

Type:	**ET3DV5**
Serial Number:	**1333**
Place of Calibration:	**Zurich**
Date of Calibration:	**April 10, 2000**
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.

Calibrated by:	
Approved by:	

Schmid & Partner
Engineering AG

Staffelstrasse 8, 8045 Zurich, Switzerland, Telefon +41 1 280 08 60, Fax +41 1 280 08 64

Probe ET3DV5

SN:1333

Manufactured:	December 20, 1997
Last calibration:	March 18, 1999
Recalibrated:	April 10, 2000

Calibrated for System DASY3

DASY3 - Parameters of Probe: ET3DV5 SN:1333

Sensitivity in Free Space

Diode Compression

NormX	**2.39** $\mu V/(V/m)^2$	DCP X	**100** mV
NormY	**2.36** $\mu V/(V/m)^2$	DCP Y	**100** mV
NormZ	**2.34** $\mu V/(V/m)^2$	DCP Z	**100** mV

Sensitivity in Tissue Simulating Liquid

Brain **450 MHz** ε_r **= 48 ± 5%** σ **= 0.50 ± 10% mho/m**

ConvF X	**6.03**	extrapolated	Boundary effect:	
ConvF Y	**6.03**	extrapolated	Alpha	**0.13**
ConvF Z	**6.03**	extrapolated	Depth	**3.57**

Brain **900 MHz** ε_r **= 42.5 ± 5%** σ **= 0.86 ± 10% mho/m**

ConvF X	**5.70**	± 7% (k=2)	Boundary effect:	
ConvF Y	**5.70**	± 7% (k=2)	Alpha	**0.34**
ConvF Z	**5.70**	± 7% (k=2)	Depth	**3.00**

Brain **1500 MHz** ε_r **= 41 ± 5%** σ **= 1.32 ± 10% mho/m**

ConvF X	**5.25**	interpolated	Boundary effect:	
ConvF Y	**5.25**	interpolated	Alpha	**0.61**
ConvF Z	**5.25**	interpolated	Depth	**2.23**

Brain **1800 MHz** ε_r **= 41 ± 5%** σ **= 1.69 ± 10% mho/m**

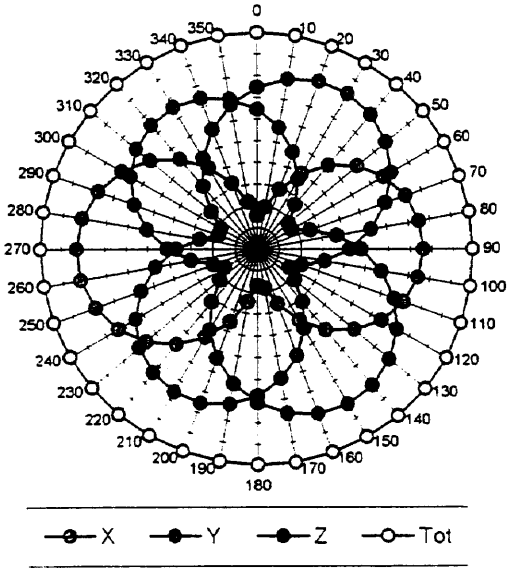
ConvF X	**5.03**	± 7% (k=2)	Boundary effect:	
ConvF Y	**5.03**	± 7% (k=2)	Alpha	**0.74**
ConvF Z	**5.03**	± 7% (k=2)	Depth	**1.85**

Sensor Offset

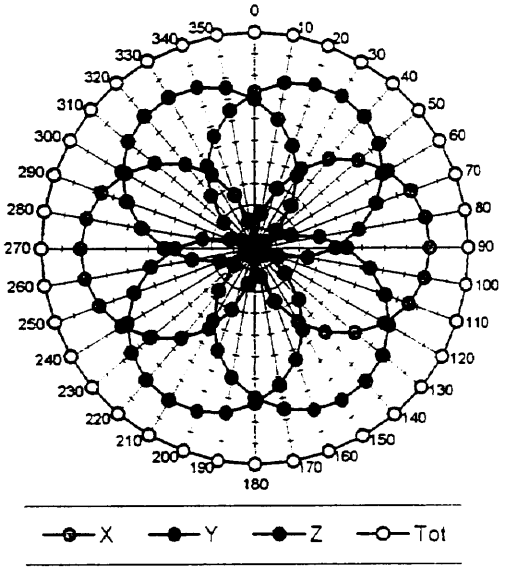
Probe Tip to Sensor Center	**2.7**	mm
Optical Surface Detection	**1.9 ± 0.2**	mm

Receiving Pattern (ϕ), θ = 0°

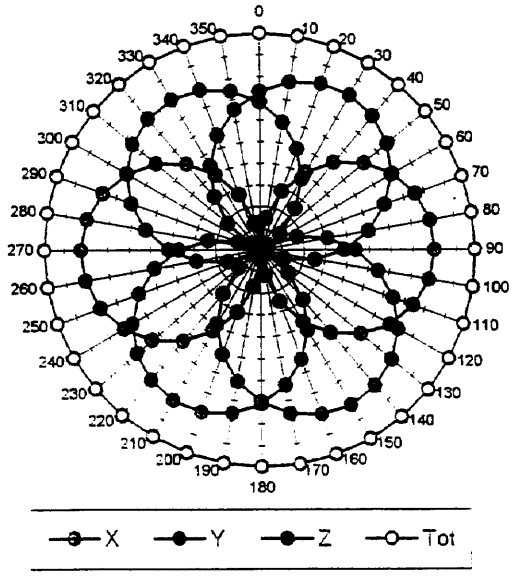
f = 30 MHz, TEM cell ifi110



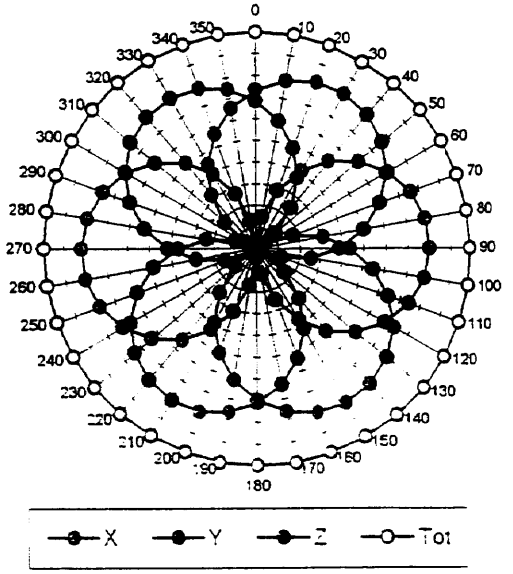
f = 100 MHz, TEM cell ifi110

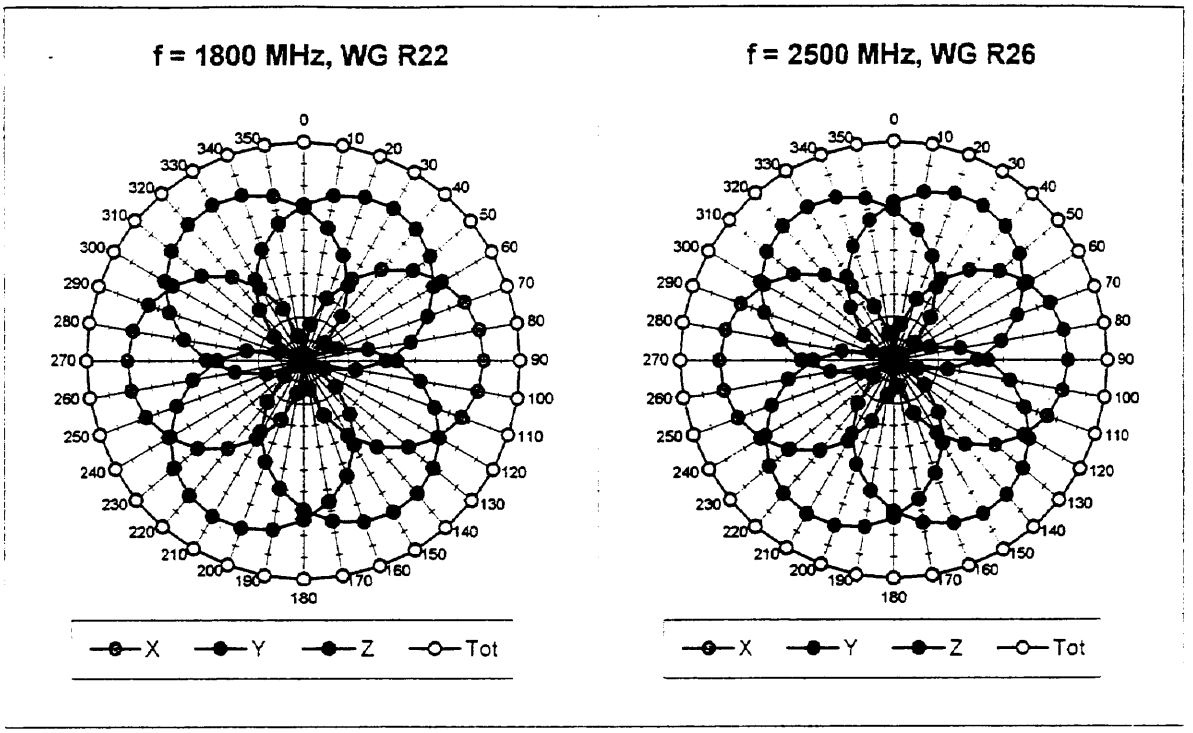


f = 300 MHz, TEM cell ifi110

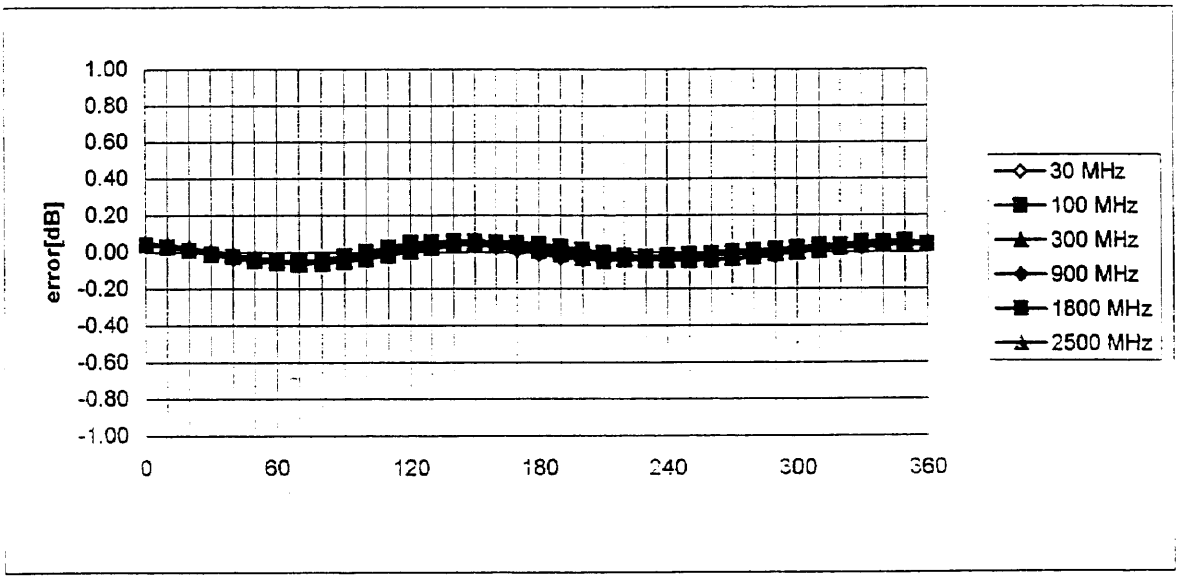


f = 900 MHz, TEM cell ifi110



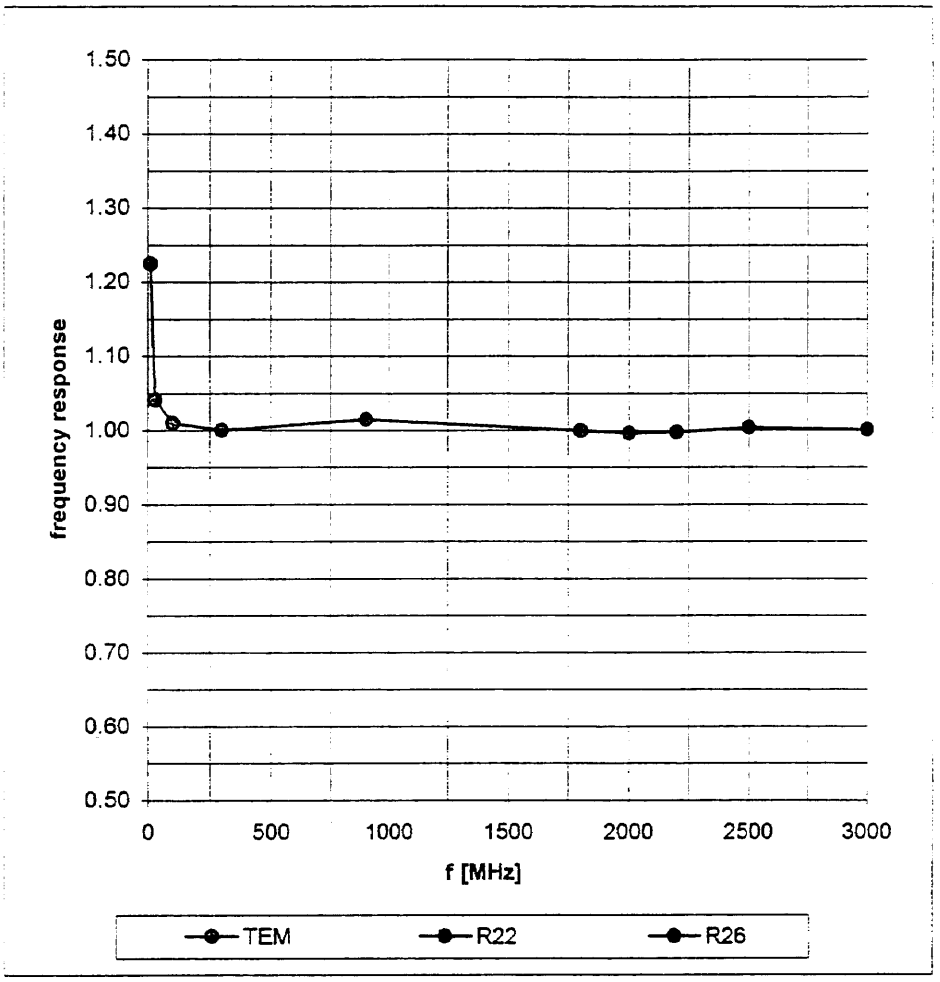


Isotropy Error (ϕ), θ = 0°



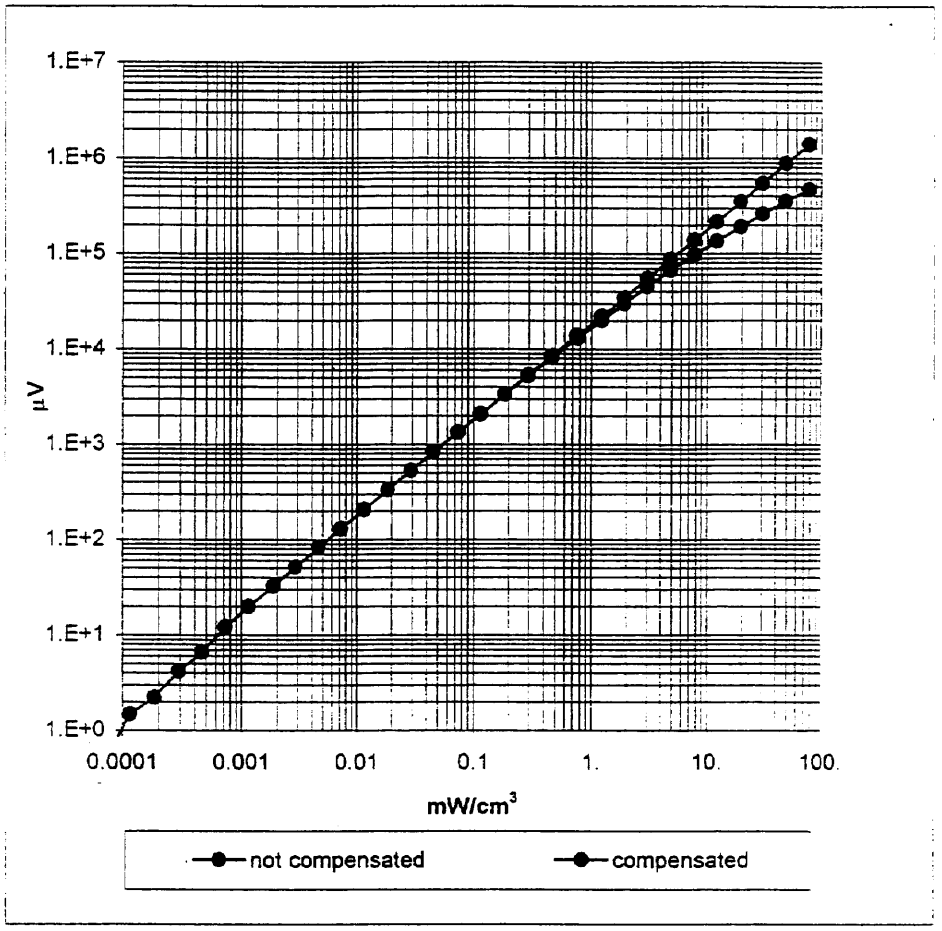
Frequency Response of E-Field

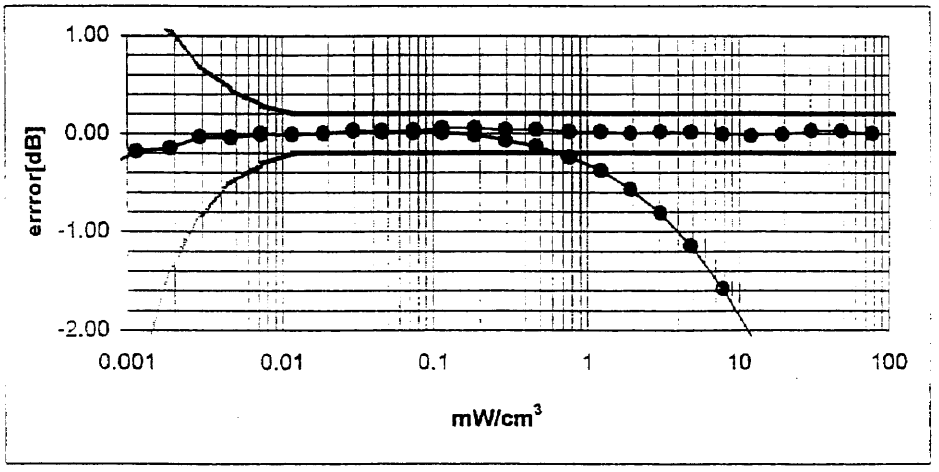
(TEM-Cell:ifi110, Waveguide R22, R26)



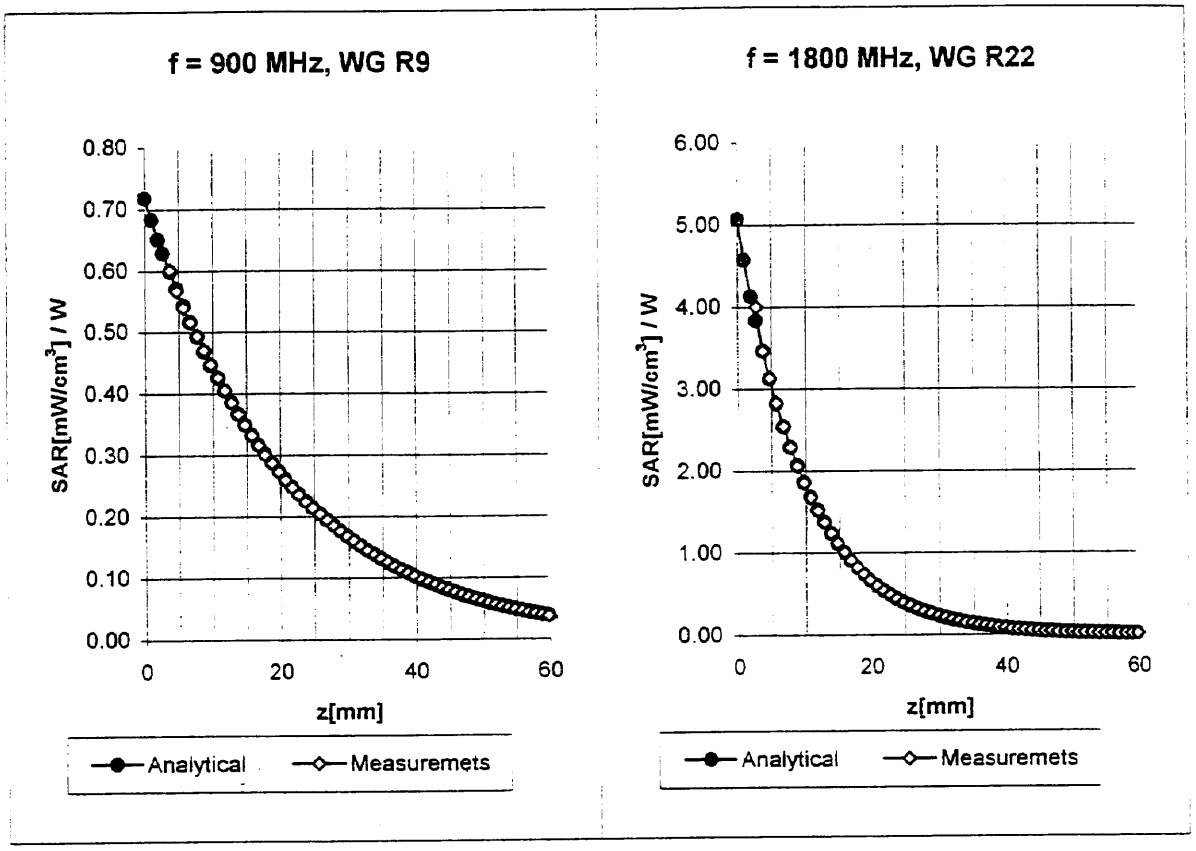
Dynamic Range f(SAR_{brain})

(TEM-Cell:ifi110)



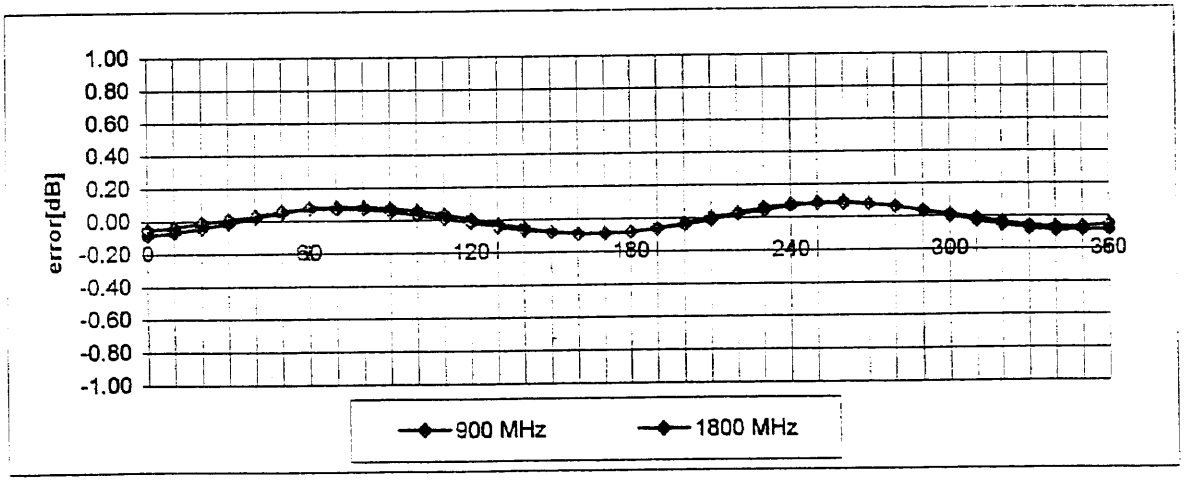


Conversion Factor Assessment



Receiving Pattern (ϕ)

(in brain tissue, z = 5 mm)



8.0 Document History

Revision/ Job Number	Writer Initials	Date	Change
1.0 / J200421989	SS	March 2, 2001	Original document