SAR EVALUATION
CERTIFICATE OF COMPLIANCE

APPLICANT: GrayHill, Inc.

APPLICANT NAME AND ADDRESS:		**DATE OF TEST:**	September 18, 2006
GrayHill, Inc.		**TEST LOCATION:**	MET LABORATORIES INC.
561 Hillgrove Avenue			914 West Patapsco Ave.
LaGrange, IL 60525			Baltimore, Maryland 21230

EUT:	DuraMax		
Date of Receipt:	July 19, 2006		
Device Category:	WLAN		
RF exposure environment:	Uncontrolled		
RF exposure category:	Portable		
Power supply:	Powered by Battery		
Antenna:	Integrated Antenna		
Production/prototype:	Production		
Measured Standards:	FCC OET 65 SUPPLEMENT C		
Modulation:	QPSK		
TX Range:	2412-2462 MHz		
Used TX Channels:	Low: Ch 1 2412 MHz	Center: Ch 6 2437 MHz	High: Ch 11 2462 MHz
Maximum RF Power Output:	0.0248 Watts EIRP		
Maximum SAR Measurement (averaged over: 1g)	**0.216** W/kg Body		

This wireless portable device has been tested in accordance with the measurement procedures specified in FCC OET 65 SUPPLEMENT C and IEEE Std. 1528- (July 2001), and has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.3 - 2002

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

Kevin A. Mehaffey
EMC Lab Manager

October 17, 2006

GrayHill, Inc.
561 Hillgrove Avenue
LaGrange, IL 60525

Reference: DuraMax

Dear Mr. Andrew Kolodziej:

Enclosed is the EMC SAR Evaluation Report for the **GrayHill, Inc.** DuraMax. It was tested in accordance with the measurement procedures specified in FCC OET 65 SUPPLEMENT C shown to be capable to be in compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in FCC OET 65 SUPPLEMENT C.

Thank you for using the testing services of MET Laboratories. If you have any questions regarding these results or if MET can be of further assistance to you, please feel free to contact me. We appreciate your business and look forward to working with you again soon.
Kindest Regards,
MET LABORATORIES, INC.

Angela D. Brown
Documentation Department

Enclosures:

DOCTEM-23 Jan 04

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The Nation's First Licensed Nationally Recognized Testing Laboratory

Dosimetric Assessment

Test Report

for the

GrayHill, Inc.
DuraMax

Tested and Evaluated
In Accordance With
FCC OET 65 SUPPLEMENT C

MET REPORT: EMC20292-SAR-FCC

October 17, 2006

PREPARED FOR:

GrayHill, Inc.
561 Hillgrove Avenue
LaGrange, IL 60525

PREPARED BY:

MET Laboratories, Inc.
914 West Patapsco Avenue
Baltimore, Maryland 21230-3432

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Dosimetric Assessment
TEST REPORT

for the

GrayHill, Inc.
DuraMax

In Accordance With
FCC OET 65 SUPPLEMENT C

Prepared for

GrayHill, Inc.
561 Hillgrove Avenue
LaGrange, IL 60525

Report Prepared By	Angela D. Brown Documentation Department	
Report Reviewed By	Len Knight TEST ENGINEER	
Final Review By	Kevin A. Mehaffey EMC LAB MANAGER	

Engineering Statement: The measurements shown in this report were made in accordance with the procedures specified in FCC OET 65 SUPPLEMENT C. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment evaluated is capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.3-2002.

Kevin A. Mehaffey
EMC LAB MANAGER

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Quick Links

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1.0 OBJECTIVE

The objective of the procedure was to perform a dosimetric assessment on the **DuraMax** card. The measurements have been carried out with the dosimetric assessment system “SARA2", and were made according to the FCC OET 65 SUPPLEMENT C for evaluating compliance of mobile and portable devices with FCC OET 65 SUPPLEMENT C limits for human exposure in the general population to radio frequency emissions.

2.0 SAR DEFINITION

Specific absorption rate (SAR) is the biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest. It is a measure of the power absorbed per unit mass and may be spatially averaged over the total mass of an exposed body or its parts.

In mathematical terms Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy absorbed by (dissipated in) an incremental mass contained in a volume element of a given density. It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body as given below**.** The SAR is calculated from the r.m.s. electric field strength E inside the human body, the conductivity σ and the mass density ρ of the biological tissue:

$$SAR = \frac{|E|^2 \sigma}{\rho}$$

SAR is expressed in units of Watts per Kilogram (W/kg)

σ = Conductivity of the tissue-simulant material (S/m)
ρ= Mass density of the tissue-simulant material (kg/m^3)
E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.

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3.0 SUMMARY FOR SAR TEST REPORT

BODY SAR MEASUREMENT RESULTS (2450 MHz) Band								
Freq. (MHz)	Channel	Test Mode	EIRP Power Before (dBm)	Power Supply	Antenna Type	EUT Test Position	Phantom Section	Measured SAR 1g (W/kg)
2412	Low	DTS	13.93	Battery	Internal	Back	Planar	0.216
2437	Mid	DTS	11.53	Battery	Internal	Back	Planar	0.138
2462	High	DTS	7.84	Battery	Internal	Back	Planar	0.091
2412	Low	DTS	13.93	Battery	Internal	Side	Planar	0.103
2437	Mid	DTS	11.53	Battery	Internal	Side	Planar	0.085
2462	High	DTS	7.84	Battery	Internal	Side	Planar	0.067
2412	Low	DTS	13.93	Battery	Internal	Front	Planar	0.37
2437	Mid	DTS	11.53	Battery	Internal	Front	Planar	0.035
2462	High	DTS	7.84	Battery	Internal	Front	Planar	0.023
ANSI/IEEE C95.1 1992 – SAFETY LIMIT BODY: 1.60 W/kg (averaged over 1 gram) Spatial Peak - Uncontrolled								

Measured Mixture Type	2450 MHz Body		Date Tested	September 18, 2006
Dielectric Contant εr	IEEE Target	Measured	Duty Cycle	100%
	52.7	52.38	Ambient Temperature (C)	22.9
Conductivity Σ (mho/m)	IEEE Target	Measured	Fluid Temperature (C)	22.0
	1.95	2.02	Fluid Depth	≥15cm

Maximum Results Found during SAR Evaluation

The equipment is deemed to fulfill the requirements if the measured values are less than or equal to the limit.

Body Worn Configuration

Test Configurations	Position	Power (dBm)	Channel	Frequency (MHz)	Max. 1g SAR (W/kg)
Body	Back	13.93	Low	2412	0.216

Table 2: The Max SAR value for Body Testing (The power mentioned above is EIRP)

4.0 DESCRIPTION OF TESTED DEVICE

Applicant:	GrayHill, Inc.		
Description of Test Item:	DuraMax		
FCC ID:	NMAM1YY1021		
Supply Voltage:	Li-Polymer Battery		
Antenna Type(s) Tested:	Internal Dipole		
Modes and Bands of Operation:	DTS 2450 MHz		
Maximum Duty Cycle Tested:	100%		
Transmitter Frequency Range (MHz):	2412 – 2462 MHz		
Tested Frequency (MHz):	2412 MHz, 2437 MHz and 2462 MHz		
Maximum RF Power Output 2450 MHz Band DTS Mode:	2412 MHz	EIRP	13.93 dBm
	2437 MHz	EIRP	11.53 dBm
	2462 MHz	EIRP	7.84 dBm
Maximum SAR Measured:	0.216 W/g @ low channel		
Exposure Category:	Uncontrolled		
FCC and IC Rule Part(s):	FCC 47 CFR §2.1093, Part 15.247 Subpart C		
Standards:	IEEE Std. 1528-2003, FCC OET Bulletic 65, Supplement C, Edition 01-01		

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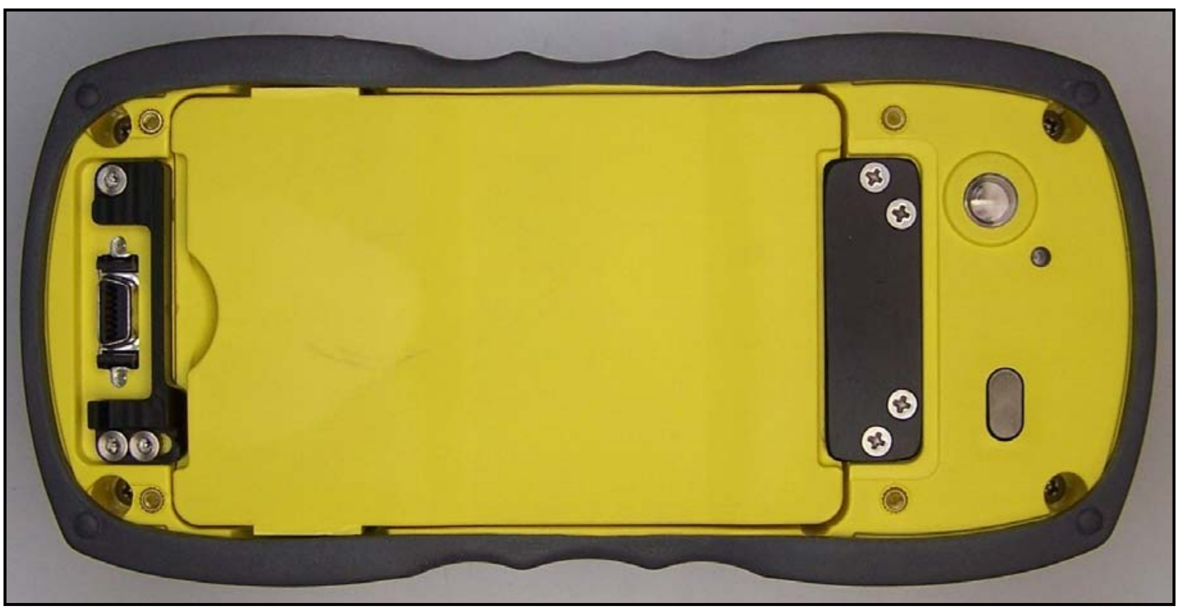
5.0 Photographs of EUT

Photograph 1. Front View of EUT



Photograph 2. Rear View of EUT

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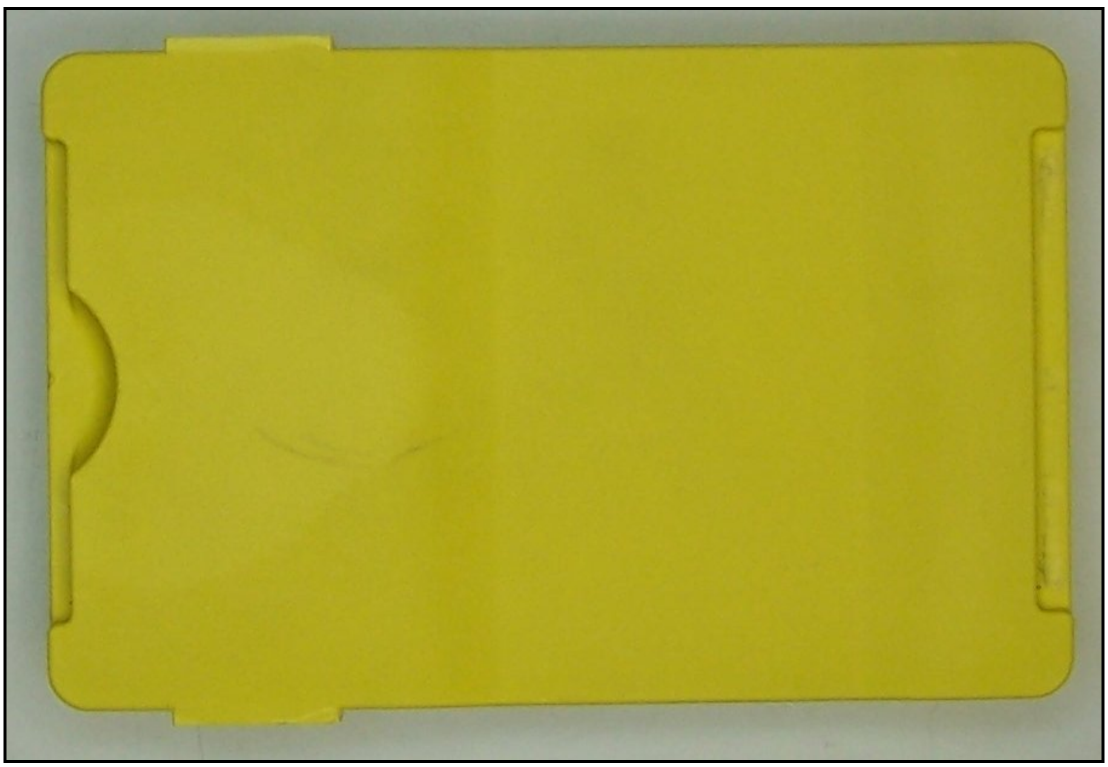
Photograph 3. Battery Compartment of EUT



Photograph 4. Rear View of Battery

Photograph 5. Compartment Side of Battery

Description of the Antenna
Integrated Antenna, Dipole GrayHill P/N: M1HH4102-1

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6.0 DETAILS OF SAR EVALUATION

The GrayHill DuraMax was determined to be compliant for localized Specific Absorption Rate based on the test provisions and conditions described below.

1. The EUT was tested for body SAR in three different orientations. The EUT was placed with the front, back and side next to the planar section of the phantom in order to facilitate a 0.0cm separation between the EUT housing and the phantom surface. The EUT was tested at the low, mid and high channels of the TX band.

2. The EUT was placed into a test mode through the key pad interface and set for continuous transmit as instructed by the customer.

3. The SAR evaluations were performed with a fully charged battery.

4. According to customer instructions, the EUT was set at maximum power output of 14 dBm conducted.

5. In accordance with customer recommendations, the EUT is to be used hand held or body worn. The EUT is not intended for held to head operation.

6. Prior to SAR testing, the maximum power EIRP was measured. The methods of TIA/EIA STD 603 were used.

7. The dielectric parameters of the simulated body fluid were measured prior to the evaluation using an 85070D Dielectric Probe Kit and an 8753ES Network Analyzer.

8. The EUT contains both a Bluetooth transmitter and a WLAN transmitter. According to customer instruction, it is not possible for both transmitters to be running simultaneously therefore removing the possibility of a higher SAR value as a contribution of both transmitters. Preliminary SAR measurements on the Bluetooth showed significant less SAR than the preliminary scans on the WLAN. Therefore, final measurements were made on the WLAN.

9. The fluid and air temperature was measured prior to and after each SAR evaluation to ensure the temperature remained within ±2°C of the temperature of the fluid when the dielectric properties were measured.

10. During the SAR evaluations, if a distribution produced several hotspots over the course of the area scan, each hotspot was evaluated separately.

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TEST DETAILS

Tissue Recipes

Typical Composition of Ingredients for Liquid Tissue Phantoms

Ingredients (% by weight)	Frequency (MHz)									
	450		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	70.0	54	73.1
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.32	0.2	0.3
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	0.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	0.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.0	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	29.68	45.8	26.6
Dielectric Constant (Measured) Deviation (%)									39.7 (1.2)	53.1 (0.7)
Conductivity (S/m) (Measured) Deviation (%)									1.82 (1.1)	1.92 (-1.5)

Dielectric Constant (Target)	43.5	56.7	41.5	55.2	41.5	55.0	40.0	53.3	39.2	52.7
Conductivity (S/m) (Target)	0.87	0.94	0.90	0.97	0.98	1.05	1.40	1.52	1.80	1.95

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System Validation

Following equipment is used for the system validation:

Signal Generator (Rohde and Schwarz SMIQ 03)
RF Amplifier (Mini Circuits ZHL-42.)
Dual Directional Coupler (HP 11691D)
The HP 8564E Spectrum Analyzer
Power meter and sensor (Agilent EPM-442A and E9304A)
Cables, Attenuate and Adapters

The recommended (IEEE Std 1528) set-up was used:

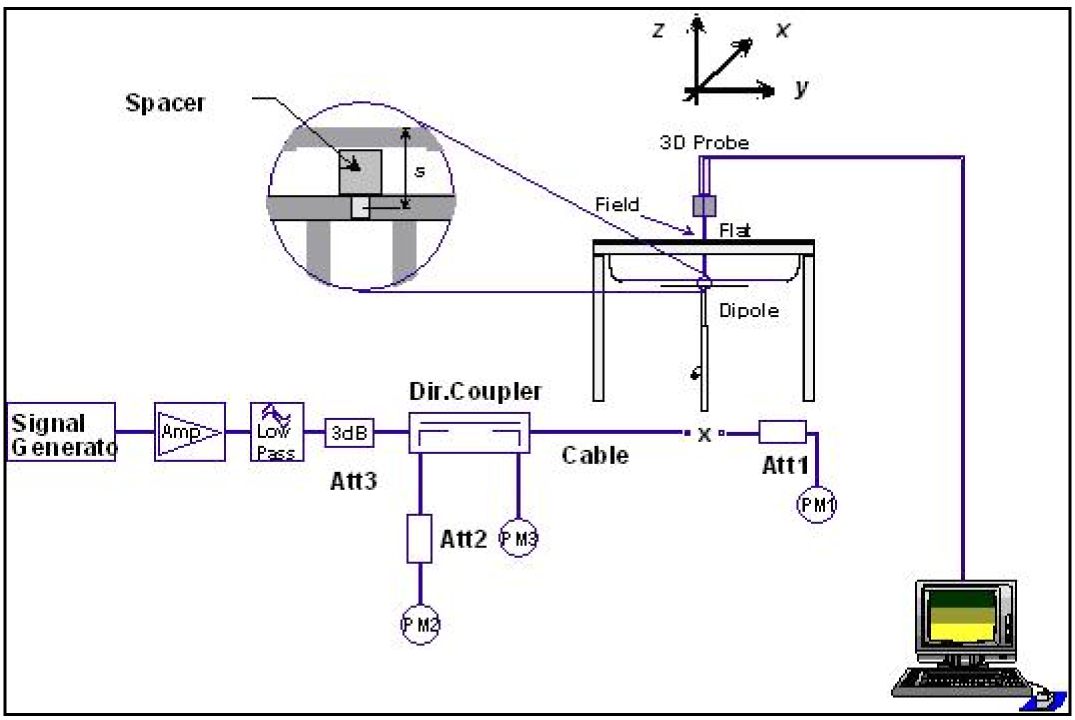

Figure 13. Performance Check Setup Diagram

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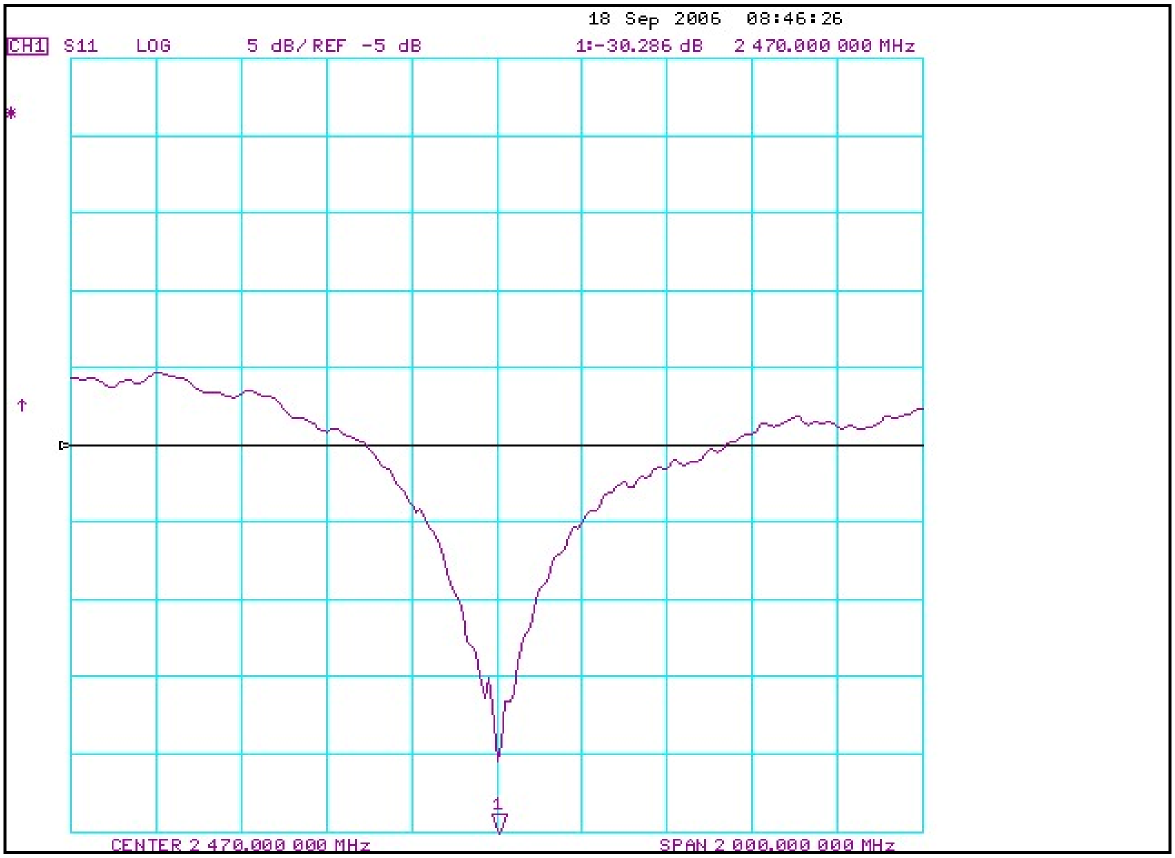
Dipole Return Loss

A Vector Network Analyzer (VNA) was used to perform a return loss measurement on the specific dipole when in the measurement-location against the box phantom. The distance was as specified in the standard i.e. 10 mm from the liquid (for 2450 MHz). The Indexsar foam spacers were used to ensure this condition during measurement.

The following parameter was measured:

Return loss at 2450 MHz ≤-25 dB



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Performance Checking

System / software:	SARA2 / 2.40 VPM		
Date / Time:	9/18/2006 1:00:43 PM		
Filename:	validation 9_18.txt	**Probe Serial Number:**	0195
Ambient Temperature:	22.9°C	**Liquid Simulant:**	head tissue
Device Under Test:	Gray Hill	**Relative Permittivity:**	37.9
Relative Humidity:	35%	**Conductivity:**	1.808
Phantom S/No:	HeadBox01.csv	**Liquid Temperature:**	22.0°C
Phantom Rotation:	0°	**Max SAR Y-axis Location:**	-4.00 mm
Antenna Position:	bottom phantom	**Max SAR Z-axis Location:**	-471.10 mm
Antenna Configuration:	dipole	**Max E Field:**	43.70 V/m
Test Frequency:	2450MHz	**SAR 1g:**	5.025 W/kg
Air Factors:	374 / 489 / 337	**SAR 10g:**	2.249 W/kg
Conversion Factors:	.379 / .379 / .379	**SAR Start:**	0.260 W/kg
Type of Modulation:	CW	**SAR End:**	0.264 W/kg
Modn. Duty Cycle:	100%	**SAR Drift during Scan:**	1.45 %
Diode Compression Factors (V*200):	20 / 20 / 20	**Probe battery last changed:**	18/09/06
Input Power Level:	20 dBm	**Extrapolation:**	poly4

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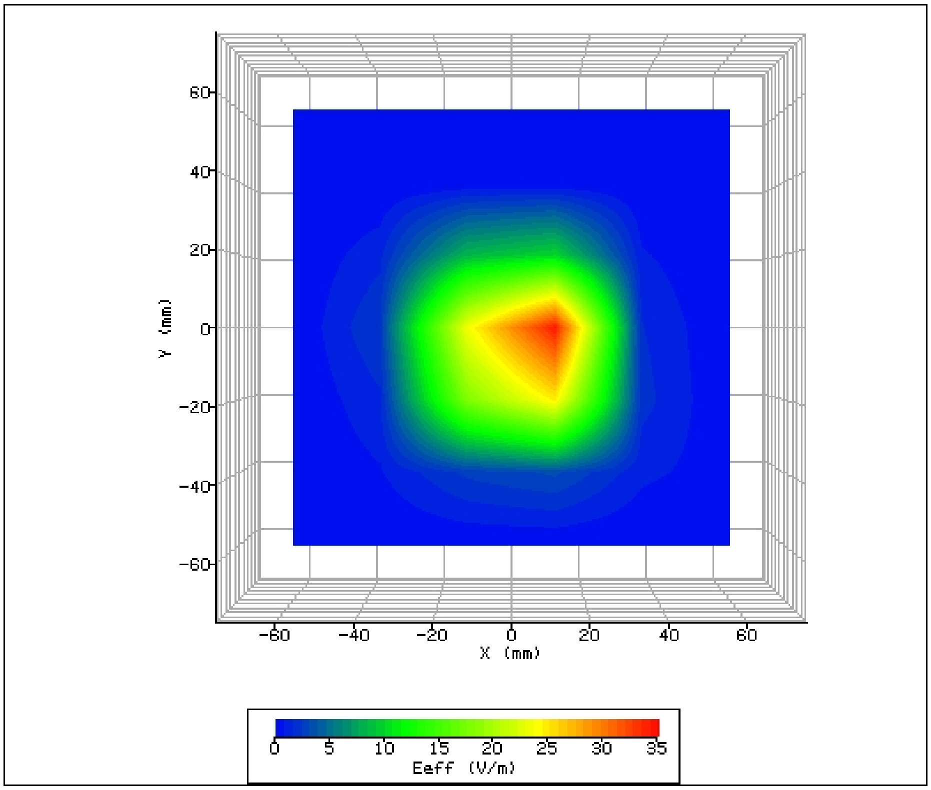

Validation Measurement – 2450 MHz in Head tissue

Simulant	Freq [MHz]	Room Temp [C]	Liquid Temp [C]	Parameters	Target Value	Measured Value	Deviation [%]	Limit [%]
Head	2450	22.9	22.0	ε_r	**39.2**	37.9	3.3	± 5%
				σ	**1.80**	1.808	-0.44	± 5%
				1g SAR	**52.4**	50.25	-4.1	± 10%

Table 1. System Validation Results

NOTE:

RF Forward power = 0.10W. The results are normalized to 1 Watts (CW) RF forward power
Validation was done within 100MHz of test frequency

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SAR DISTRIBUTIONS (AREA SCANS)

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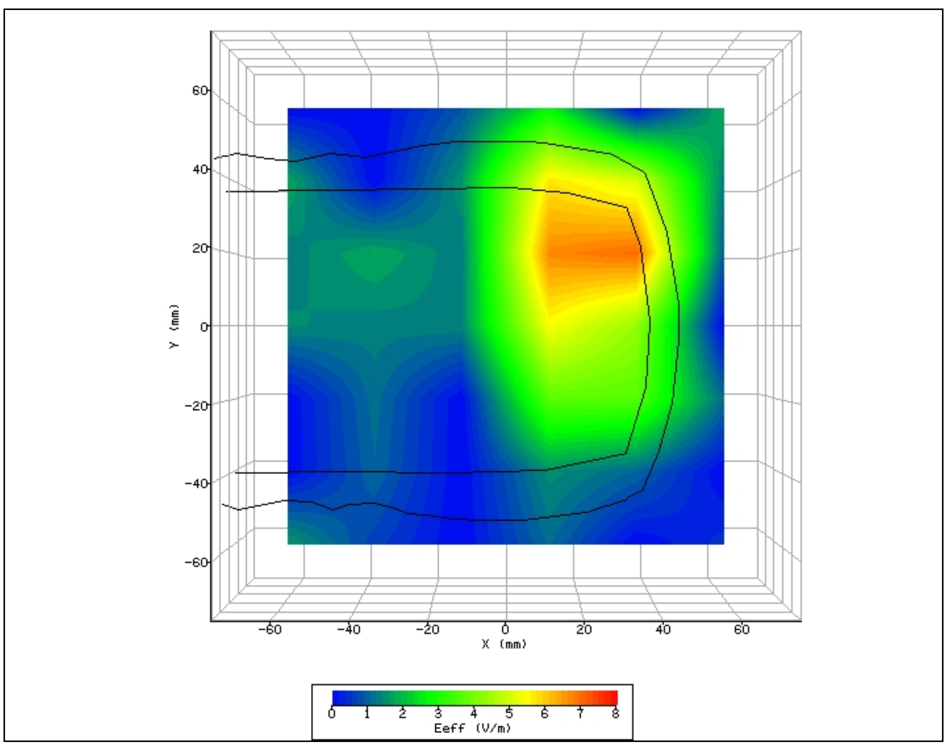
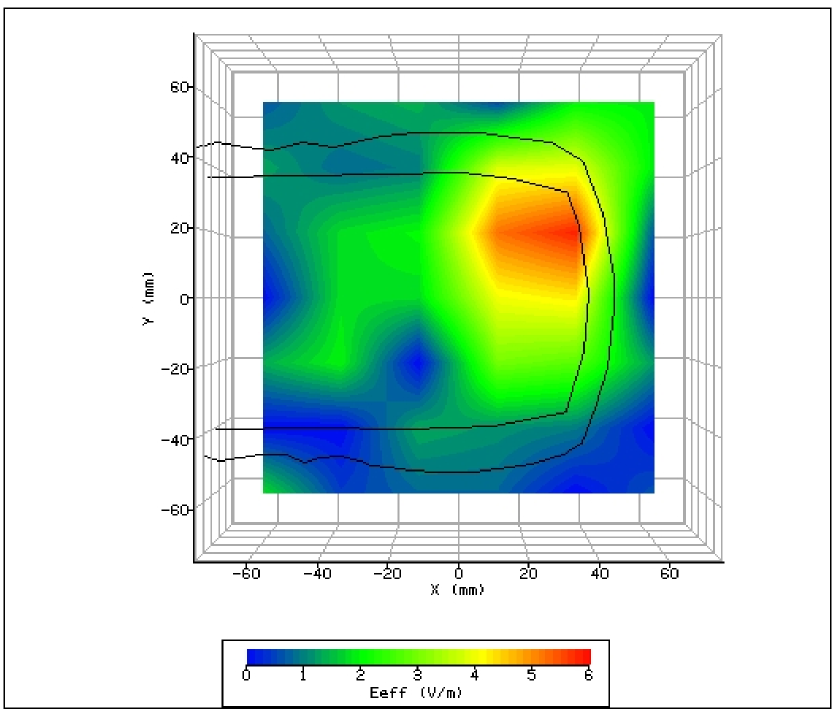
System / software:	SARA2 / 2.40 VPM	Channel	Low
Date / Time:	9/18/2006 8:39:21 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Back Ch1.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	27.33 mm
EUT Position:	back touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	9.09 V/m
Test Frequency:	2412MHz	SAR 1g:	0.216 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.122 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.024 W/kg
Type of Modulation:	QPSK	SAR End:	0.025 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	3.90 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



System / software:	SARA2 / 2.40 VPM	**Channel**	Mid
Date / Time:	9/18/2006 8:57:42 PM	**EUT Battery Model/No:**	M1YY1020-X
Filename:	Back Ch6.txt	**Probe Serial Number:**	0195
Ambient Temperature:	22.9°C	**Liquid Simulant:**	body tissue
Device Under Test:	Gray Hill	**Relative Permittivity:**	52.38
Relative Humidity:	35%	**Conductivity:**	2.02
Phantom S/No:	HeadBox01.csv	**Liquid Temperature:**	22.0°C
Phantom Rotation:	0°	**Max SAR Y-axis Location:**	25.33 mm
EUT Position:	back touch	**Max SAR Z-axis Location:**	-471.80 mm
Antenna Configuration:	custom dipole	**Max E Field:**	7.35 V/m
Test Frequency:	2437MHz	**SAR 1g:**	0.138 W/kg
Air Factors:	374 / 489 / 337	**SAR 10g:**	0.079 W/kg
Conversion Factors:	.433 / .433 / .433	**SAR Start:**	0.015 W/kg
Type of Modulation:	QPSK	**SAR End:**	0.013 W/kg
Modn. Duty Cycle:	100%	**SAR Drift during Scan:**	-13.75 %
Diode Compression Factors (V*200):	20 / 20 / 20	**Probe battery last changed:**	18/09/06
Input Power Level:	14 dBm	**Extrapolation:**	poly4



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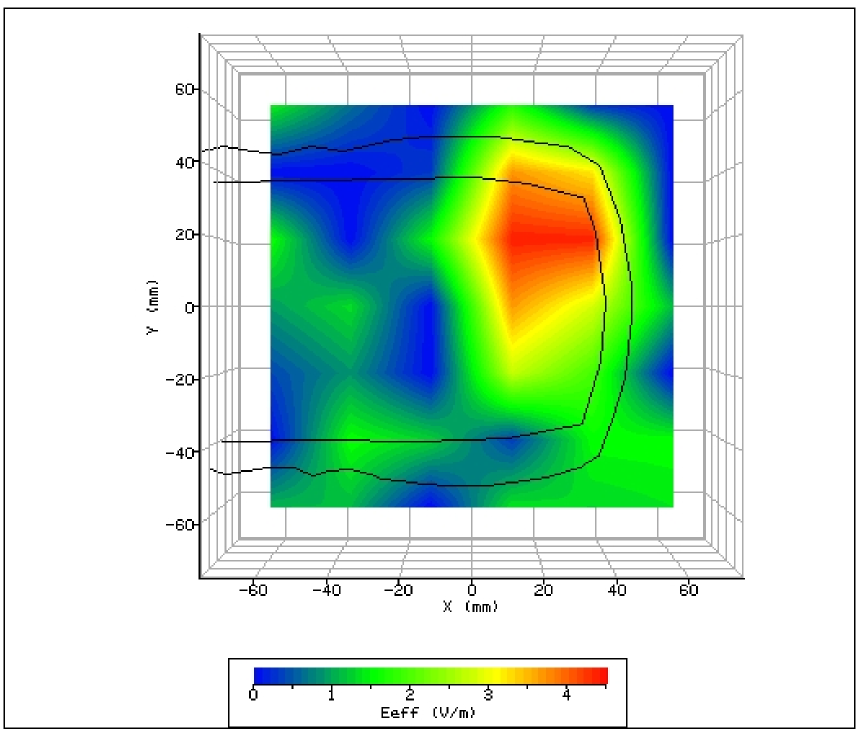
System / software:	SARA2 / 2.40 VPM	Channel	High
Date / Time:	9/18/2006 9:46:39 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Back Ch11.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	25.33 mm
EUT Position:	back touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	5.90 V/m
Test Frequency:	2462MHz	SAR 1g:	0.091 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.054 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.010 W/kg
Type of Modulation:	QPSK	SAR End:	0.011 W/kg
Modn. Duty Cycle:	100 %	SAR Drift during Scan:	17.25 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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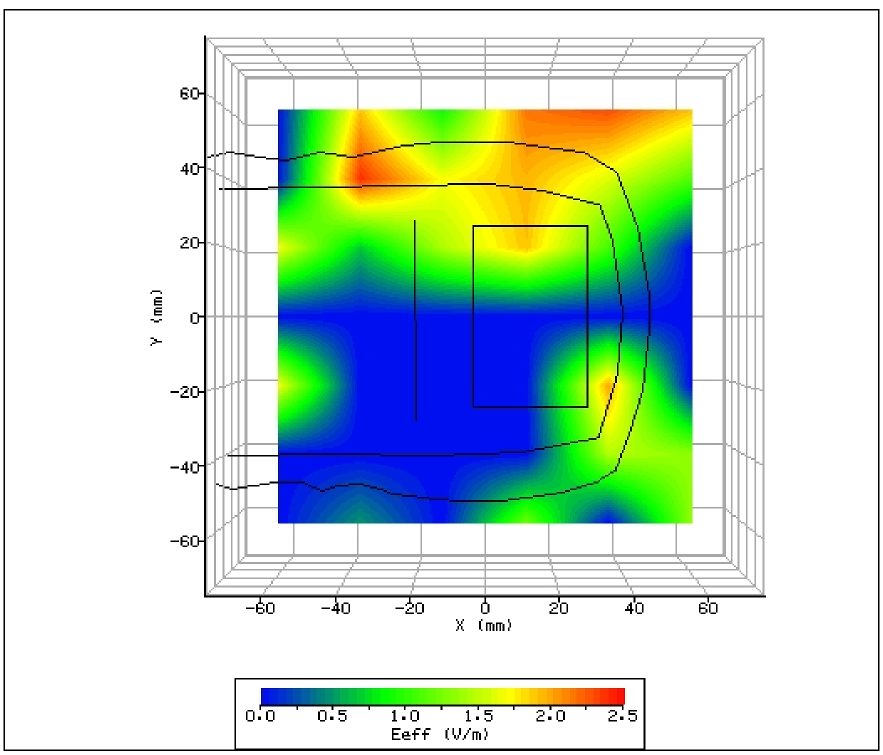
System / software:	SARA2 / 2.40 VPM	Channel	Low
Date / Time:	9/18/2006 8:21:15 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Front Ch1.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	44.00 mm
EUT Position:	front touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	3.57 V/m
Test Frequency:	2412MHz	SAR 1g:	0.037 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.023 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.002 W/kg
Type of Modulation:	QPSK	SAR End:	0.000 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	-81.97 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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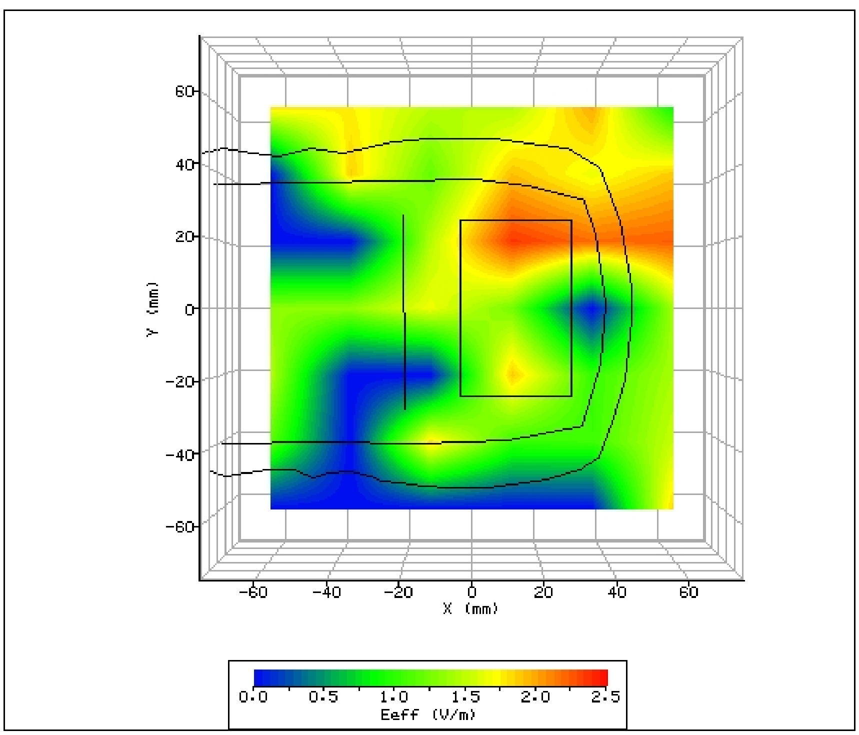
System / software:	SARA2 / 2.40 VPM	Channel	Mid
Date / Time:	9/18/2006 9:24:33 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Front Ch6.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	8.00 mm
EUT Position:	front touch	Max SAR Z-axis Location:	-437.80 mm
Antenna Configuration:	custom dipole	Max E Field:	3.66 V/m
Test Frequency:	2437MHz	SAR 1g:	0.035 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.020 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.003 W/kg
Type of Modulation:	QPSK	SAR End:	0.002 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	-34.61 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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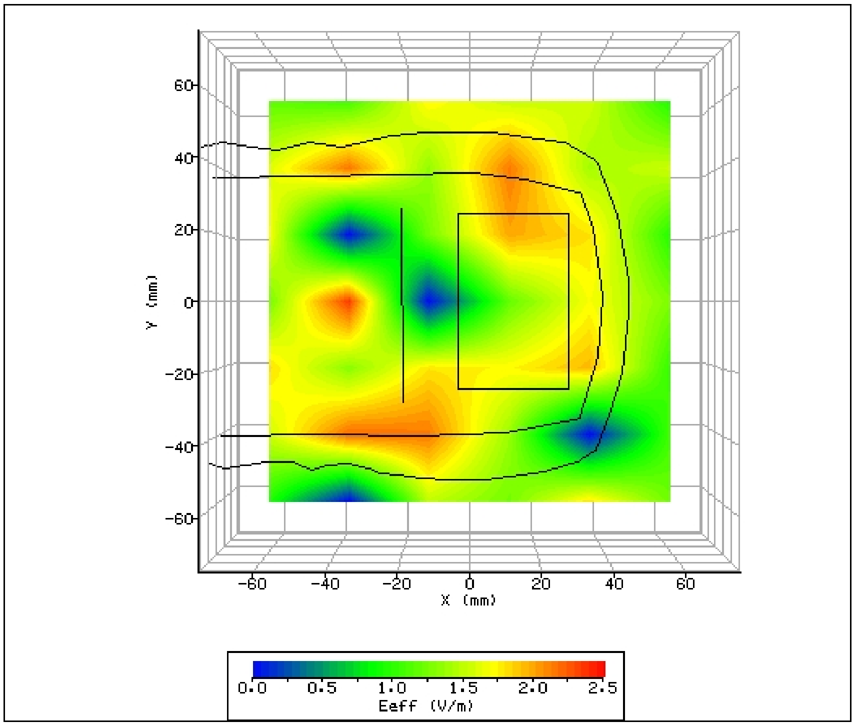
System / software:	SARA2 / 2.40 VPM	Channel	High
Date / Time:	9/18/2006 10:06:40 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Front Ch11.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	26.67 mm
EUT Position:	front touch	Max SAR Z-axis Location:	-444.60 mm
Antenna Configuration:	custom dipole	Max E Field:	3.59 V/m
Test Frequency:	2462MHz	SAR 1g:	0.023 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.016 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.007 W/kg
Type of Modulation:	QPSK	SAR End:	0.004 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	-34.31 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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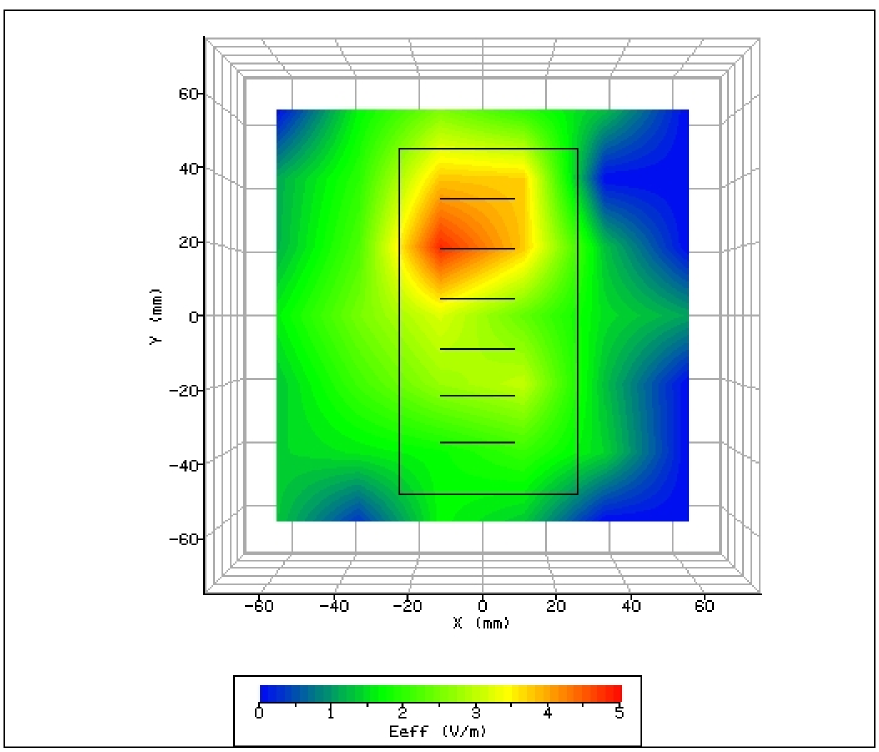
System / software:	SARA2 / 2.40 VPM	Channel	Low
Date / Time:	9/18/2006 6:56:23 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Top Ch1.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	18.67 mm
EUT Position:	side touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	6.15 V/m
Test Frequency:	2412MHz	SAR 1g:	0.103 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.055 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.006 W/kg
Type of Modulation:	QPSK	SAR End:	0.006 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	-9.04 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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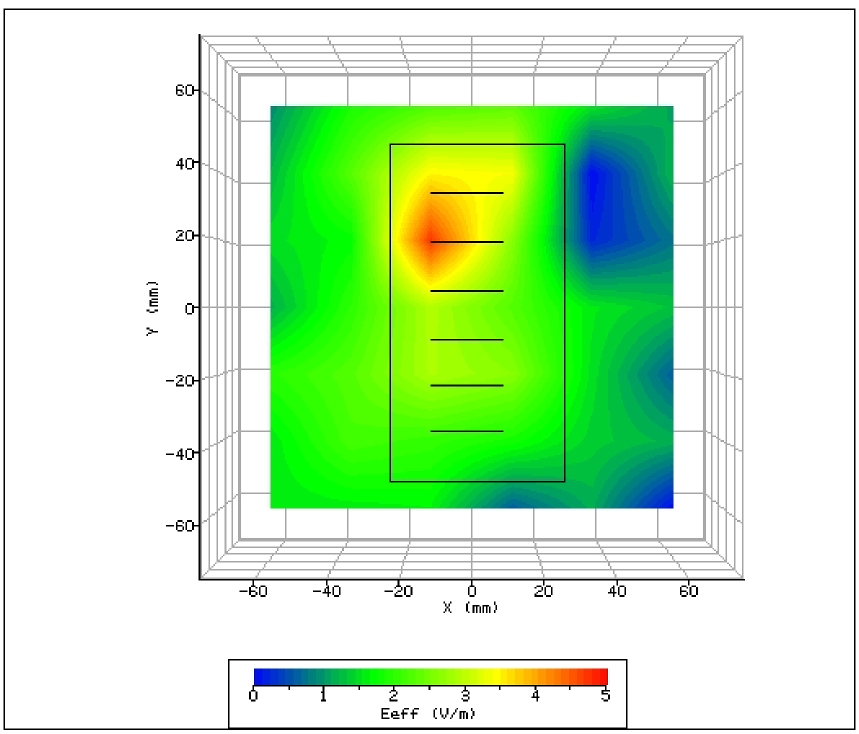
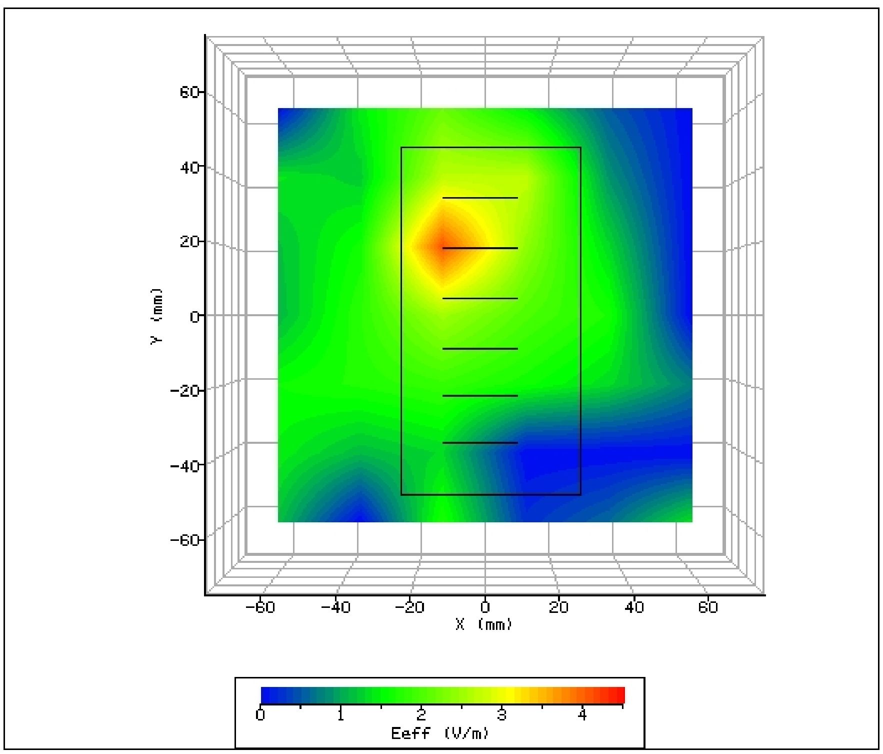
System / software:	SARA2 / 2.40 VPM	Channel	Mid
Date / Time:	9/18/2006 7:33:40 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Top Ch6.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	24.00 mm
EUT Position:	side touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	5.72 V/m
Test Frequency:	2437MHz	SAR 1g:	0.085 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.047 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.005 W/kg
Type of Modulation:	QPSK	SAR End:	0.006 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	26.11 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



System / software:	SARA2 / 2.40 VPM	Channel	High
Date / Time:	9/18/2006 7:53:47 PM	EUT Battery Model/No:	M1YY1020-X
Filename:	Top Ch11.txt	Probe Serial Number:	0195
Ambient Temperature:	22.9°C	Liquid Simulant:	body tissue
Device Under Test:	Gray Hill	Relative Permittivity:	52.38
Relative Humidity:	35%	Conductivity:	2.02
Phantom S/No:	HeadBox01.csv	Liquid Temperature:	22.0°C
Phantom Rotation:	0°	Max SAR Y-axis Location:	22.00 mm
EUT Position:	side touch	Max SAR Z-axis Location:	-471.80 mm
Antenna Configuration:	custom dipole	Max E Field:	5.11 V/m
Test Frequency:	2462MHz	SAR 1g:	0.067 W/kg
Air Factors:	374 / 489 / 337	SAR 10g:	0.037 W/kg
Conversion Factors:	.433 / .433 / .433	SAR Start:	0.003 W/kg
Type of Modulation:	QPSK	SAR End:	0.002 W/kg
Modn. Duty Cycle:	100%	SAR Drift during Scan:	-36.98 %
Diode Compression Factors (V*200):	20 / 20 / 20	Probe battery last changed:	18/09/06
Input Power Level:	14 dBm	Extrapolation:	poly4



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Setup Pictures

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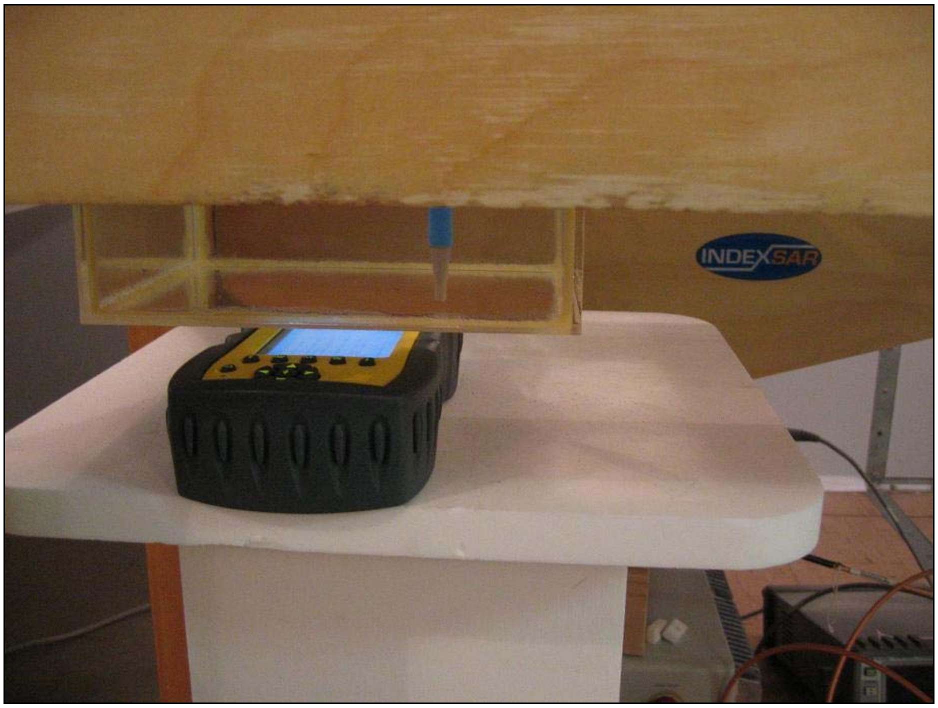
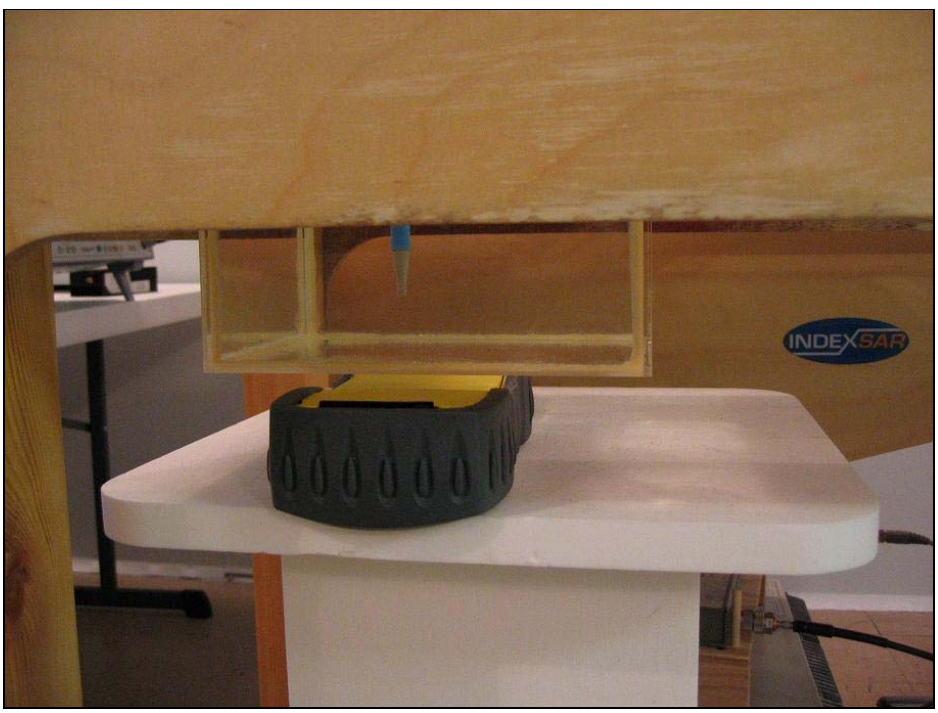


Photograph 6. Setup Configuration, Front



Photograph 7. Setup Configuration, Back

Photograph 8. Setup Configuration, Side

Measurement System

Measurement System - SARA2 System Specification

The SAR measurement system being used is the IndexSAR SARA2 system, which consists of a Mitsubishi RV-E2 6-axis robot arm and controller, IndexSAR probe and amplifier and SAM phantom Head Shape. The robot is used to articulate the probe to programmed positions inside the phantom head to obtain the SAR readings from the EUT.

The system is controlled remotely from a PC, which contains the software to control the robot and data acquisition equipment. The software also displays the data obtained from test scans.

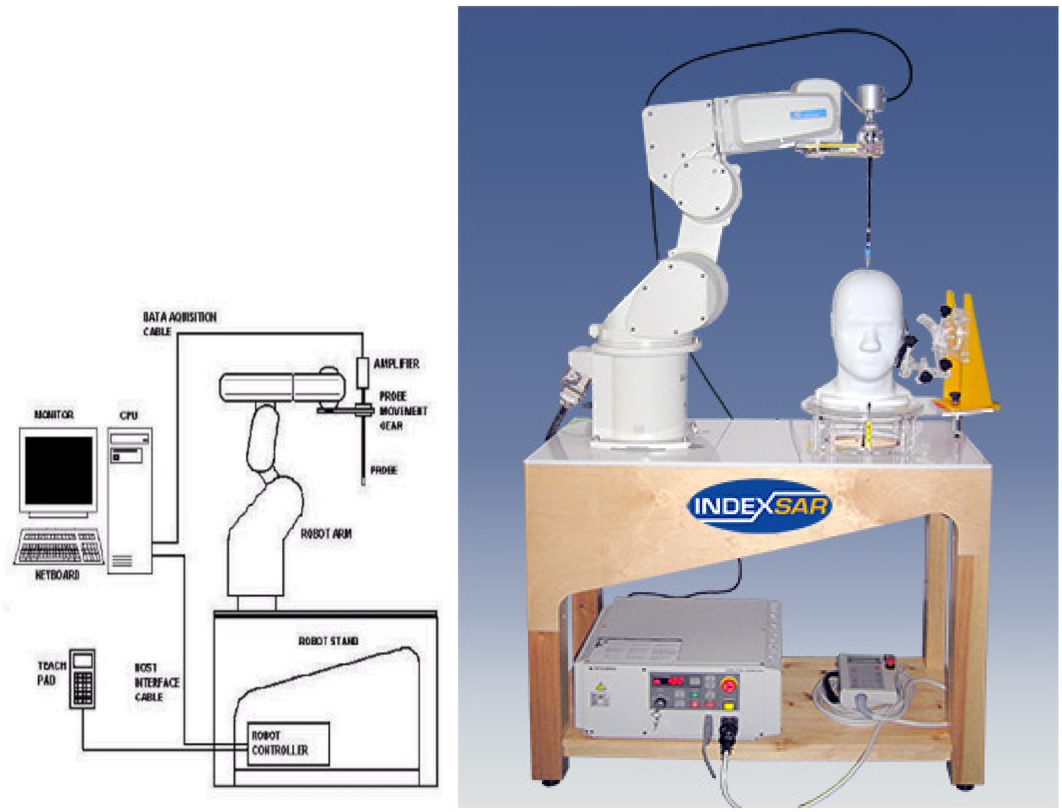


Figure 9. Block Diagram of SARA 2 System

The position and digitized shape of the phantom heads/flat baths are made available to the software for accurate positioning of the probe and reduction of set-up time.

The SAM phantom heads/flat baths are individually digitized using a Mitutoyo CMM machine to a precision of 0.001mm. The data is then converted into a shape format for the software, providing an accurate description of the phantom shell.

In operation, the system first performs an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom. When the maximum SAR point has been found, the system will then carry out a 3D scan centred at that point to determine volume averaged SAR level.

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Specifications

ROBOTIC SYSTEM

Type:	Mitsibishi Movemaster RV-2E/ 6 Axis vertical articulated robot
Dimensions (Robot):	Height: 790mm (in home position)
Dimensions (Robot Stand):	1010L x 450W x 820H mm
Weight:	Approx. 36 kgf
Position Repeatability:	+/- 0.04mm
Drive Method:	AC servomotor

CONTROLLER UNIT

Type:	CR-E116
Dimensions:	422W x 512D x 202H mm
Weight:	Approx. 27 kgf
Power source:	single-phase AC200V

E-FIELD PROBE

Type:	IXP-050 Three orthogonal dipole sensors arranged on triangular, interlocking substrates Overall length: 350mm
Dimensions:	Tip length: 10mm Body diameter: 12mm Tip diameter: 5mm Distance from probe tip to dipole centers: 2.5mm
Isotropy:	+/- 0.5 dB in brain liquids (rotation about probe axis) +/- 1.0 dB in brain liquids (rotation normal to probe axis)
Calibration:	Indexsar calibration in brain tissue simulating liquids at frequencies of 900 MHz and 1800 MHz
Dynamic Range:	0.01 W/kg to 100 W/kg in liquid. Linearity +/- 0.2 W/kg

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Data Acquisition

Processor	Pentium III
Clock Speed	700MHz
Operating System	Windows 98 or newer
I/O	One RS232 and One USB
Software	SARA2 VPM2p1a
Memory	1gB Hard drive, CDROM

IXP-020 Amplifier
High Impedance inputs with 3 independent x, y, z sensor channels giving simultaneous measurement of data every 2 ms. Reads true average of modulated signals without the need for duty cycle corrections.

Amplifier Specification

Ranges:	Software selectable of x1 to 63
Cables:	Optical cable with self powered 9 way RS232 converter. 3 m cable length supplied as standard.
Power Requirements:	2 x AAA Batteries giving approximately 100+ hours of usage.

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INDEXSAR ISOTROPIC SAR PROBES

E-Field Probe

The near field probe is an implant-able isotropic E-field probe that measures the voltages proportional to $|E|^2$ or $|H|^2$ fields. The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in more detail in the Calibration report appendix.

The overall length of probe is 350mm with a Body diameter of 12mm and tip diameter of 5mm.

Probe with Amplifier

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Indexsar Limited
Oakfield House
Cudworth Lane
Newdigate
Surrey RH5 5BG
Tel: +44 (0) 1306 632 870
Fax: +44 (0) 1306 631 834
e-mail: enquiries@indexsar.com

Calibration Certificate 0511/0195
Dosimetric E-field Probe

Type:	**IXP-050**
Manufacturer:	**IndexSAR, UK**
Serial Number:	**0195**
Place of Calibration:	**IndexSAR, UK**

IndexSAR Limited hereby declares that the IXP-050 Probe named above has been calibrated for conformity to the IEEE 1528 and CENELEC EN 50361 standards on the date shown below.

Date of Initial Calibration:	**8th December 2005**

The probe named above will require a calibration check on the date shown below.

Next Calibration Date:	**December 2006**

The calibration was carried out using the methods described in the calibration document.
Where applicable, the standards used in the calibration process are traceable to the UK's National Physical Laboratory.

Calibrated By:	A. Brinklow.

Approved By:	M.J. Manning

Please keep this certificate with the calibration document. When the probe is sent for a calibration check, please include the calibration document.

IXP-050 Calibration Certificate

E-FIELD PROBE CALIBRATION

Spherical isotropy jig showing probe

The E-field probe calibration method is based on setting up a calculable specific absorption rate (SAR) in a vertically-mounted WG8 (R22) wave-guide section [1]. The wave-guide has an air-filled, launcher section and a liquid-filled section separated by a matching window that is designed to minimize reflections at the liquid interface. A TE_{01} mode is launched into the wave-guide by means of a N-type-to-wave-guide adapter. The power delivered to the liquid section is calculated from the forward power and reflection coefficient measured at the input to the wave-guide. For a detailed description of the E-field probe calibration please refer to the calibration report provided.

The probe was calibrated at 835, 900, 1800, 1900, 2450MHz , 5200 MHz and 5800 MHz in liquid samples representing both brain liquid and body fluid at these frequencies.
The dielectric properties of the brain and body tissue-Simulant liquids employed for calibration are listed in the table below. The measurements were performed prior to each wave-guide test using an Indexsar DiLine measurement kit, which uses the TEM method as recommended in IEEE 1528.

Table indicating the dielectric parameters of the liquids used for calibrations at each frequency:

Liquid used	Relative permittivity (measured)	Conductivity (S/m) (measured)
835 MHz BRAIN	42.48	0.92
835 MHz BODY	56.86	0.94
900 MHz BRAIN	41.69	0.98
900 MHz BODY	56.30	1.00
1800 MHz BRAIN	39.60	1.38
1800 MHz BODY	51.82	1.41
1900 MHz BRAIN	39.17	1.48
1900 MHz BODY	51.61	1.50
2450 MHz BRAIN	38.78	1.86
2450 MHz BODY	54.05	2.08
5200 MHz BRAIN	35.81	5.16
5200 MHz BODY	55.01	5.37
5800 MHz BRAIN	34.26	5.29
5800 MHz BODY	51.09	6.61

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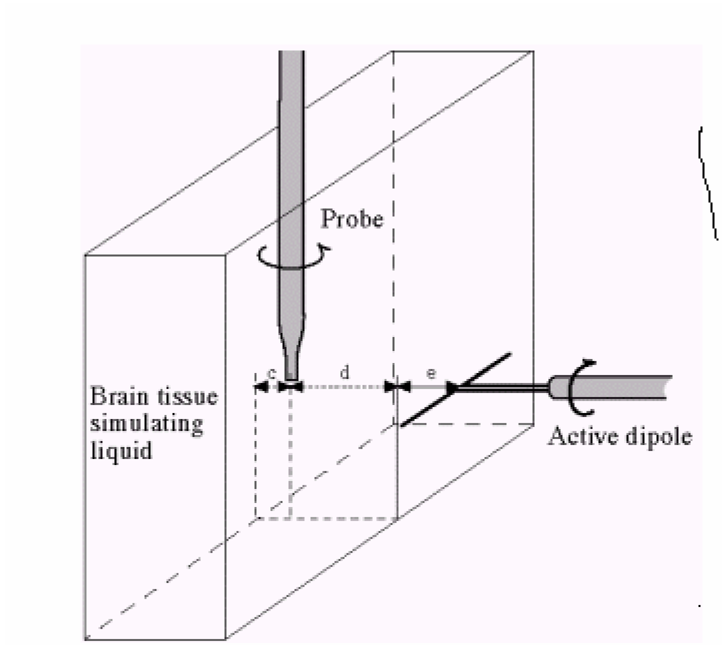
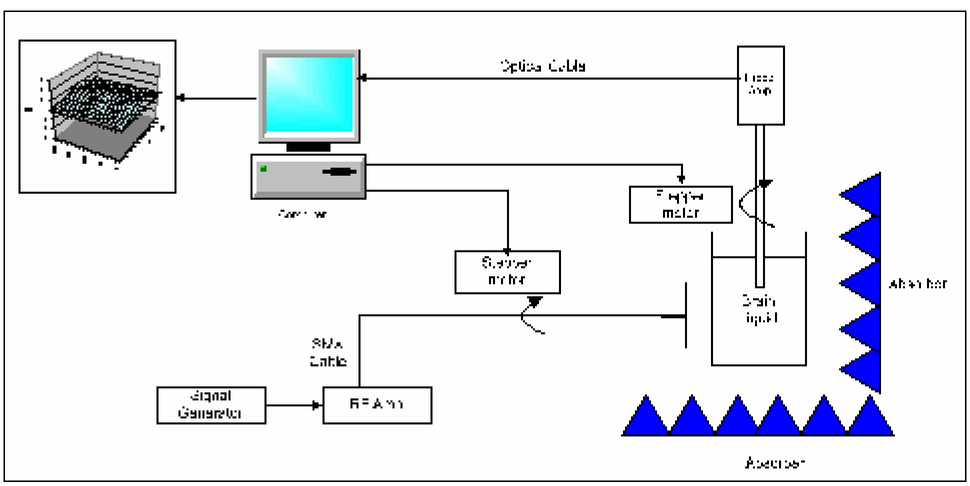


Calibration jig showing probe, dipole and box filled with simulated brain liquid



Schematic diagram of the test geometry used for isotropy

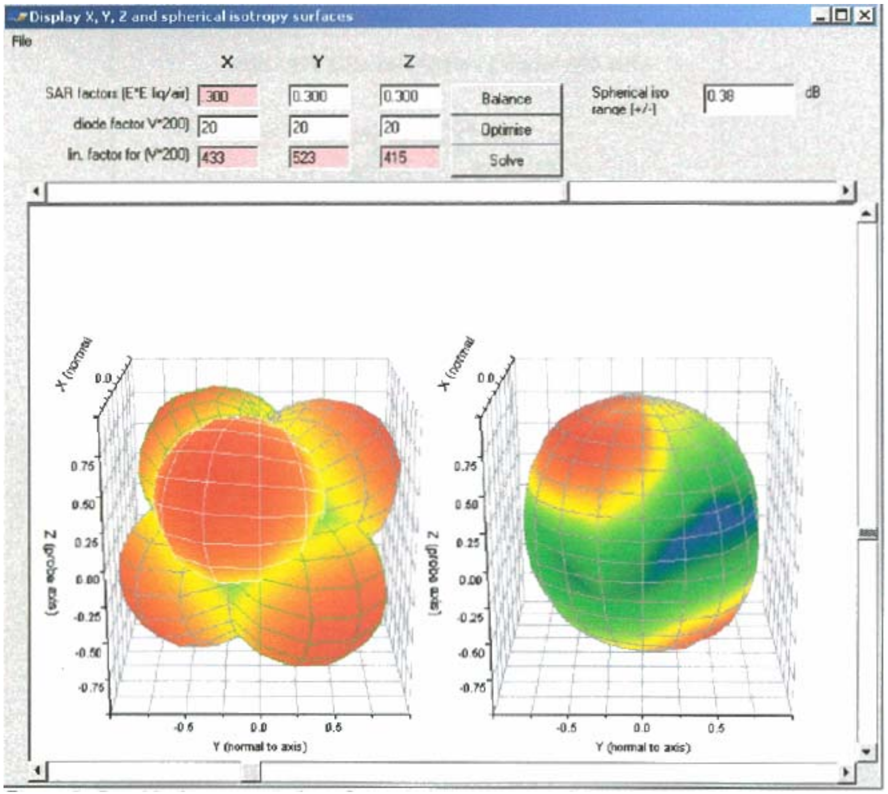


Figure 1. Graphical representation of a probe's response to fields applied from each direction.

The diagram on the left shows the individual response characteristics of each of the three channels and the diagram on the right shows the resulting probe sensitivity in each direction. The colour range in the figure images the lowest values as blue and the maximum values as red. For the probe S/N 0195, this range is (+/-) 0.27 dB.

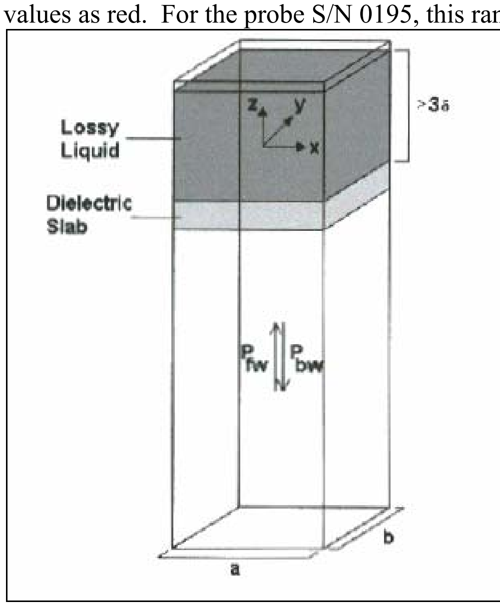


Figure 2. Geometry used for waveguide calibration (after Ref [2]. Section A.3.2.2)

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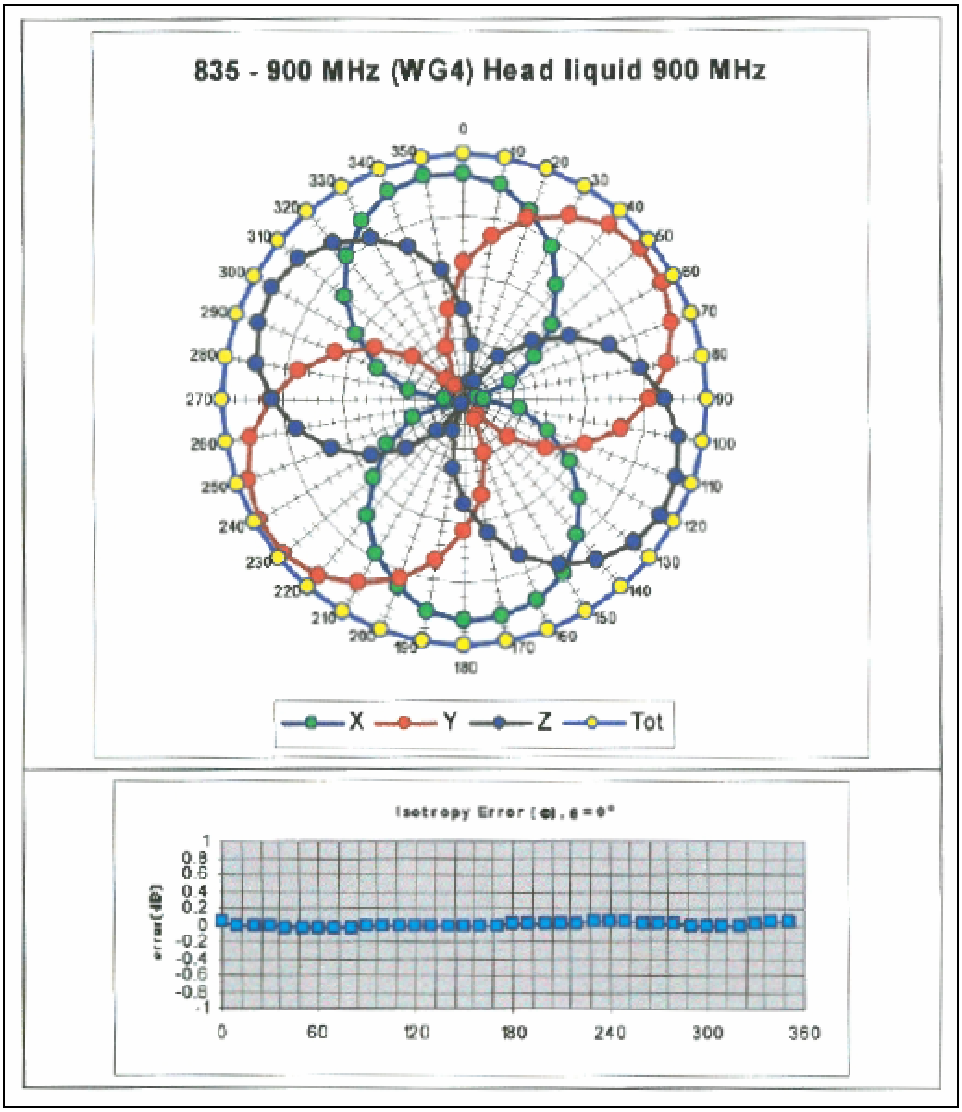

Figure 3. The rotational isotropy of probe S/N 0195 obtained by rotating the probe in a liquid filled waveguide at 900 MHz.

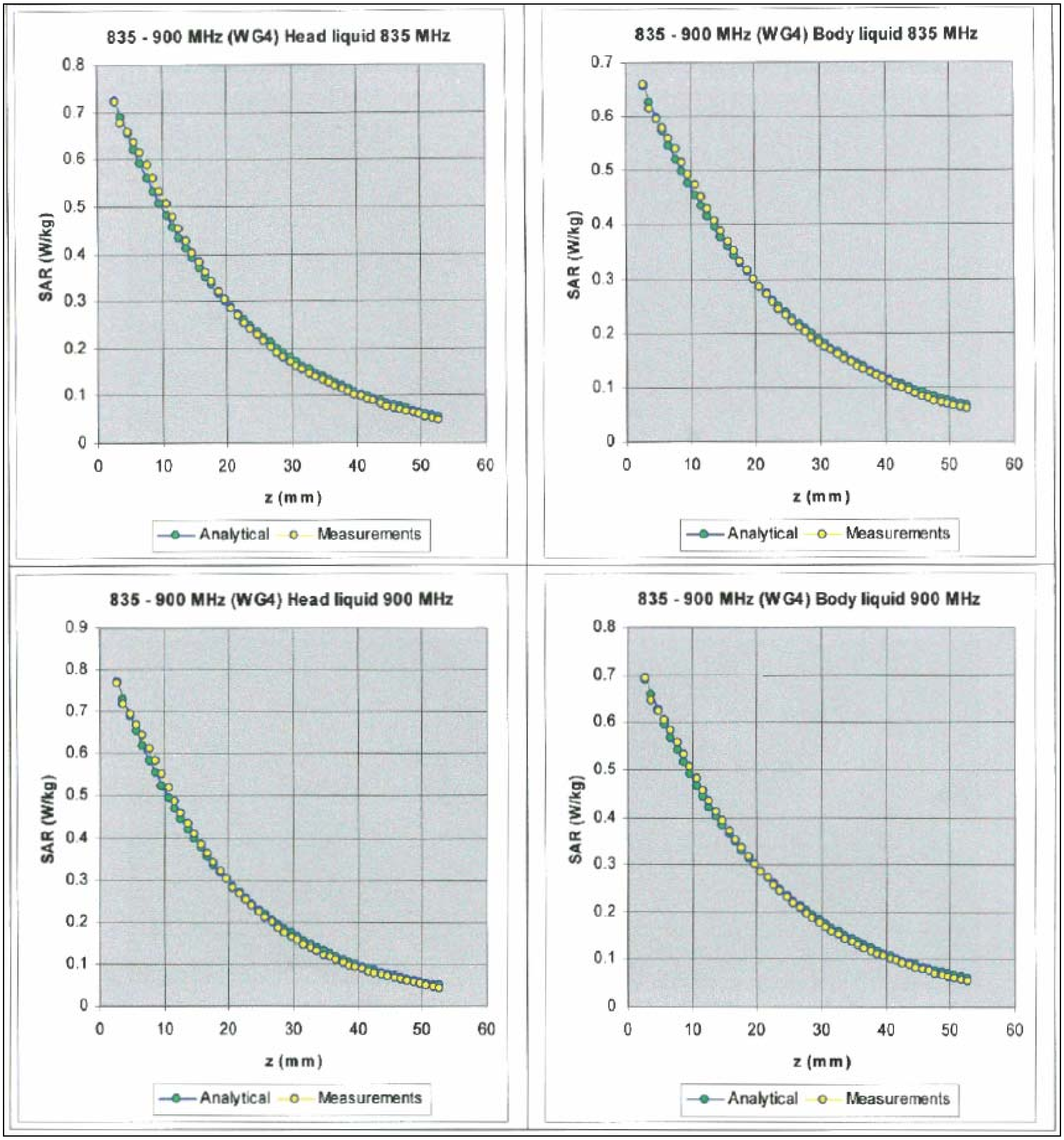

Figure 4. The measured SAR decay function along the centerline of the WG4 waveguide with conversion factors adjusted to fit to the theoretical function for the particular dimension, frequency, power and liquid properties employed.

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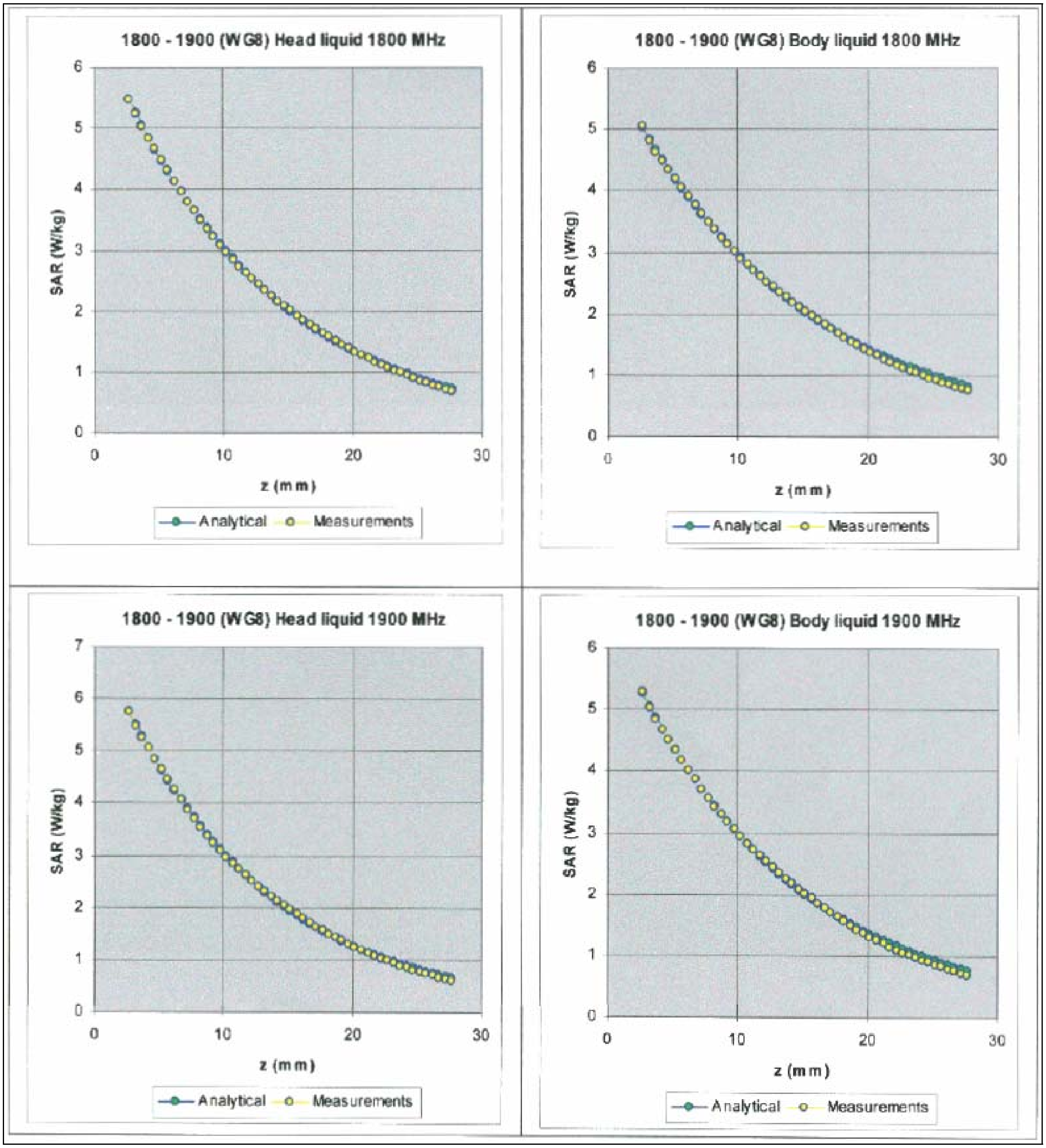
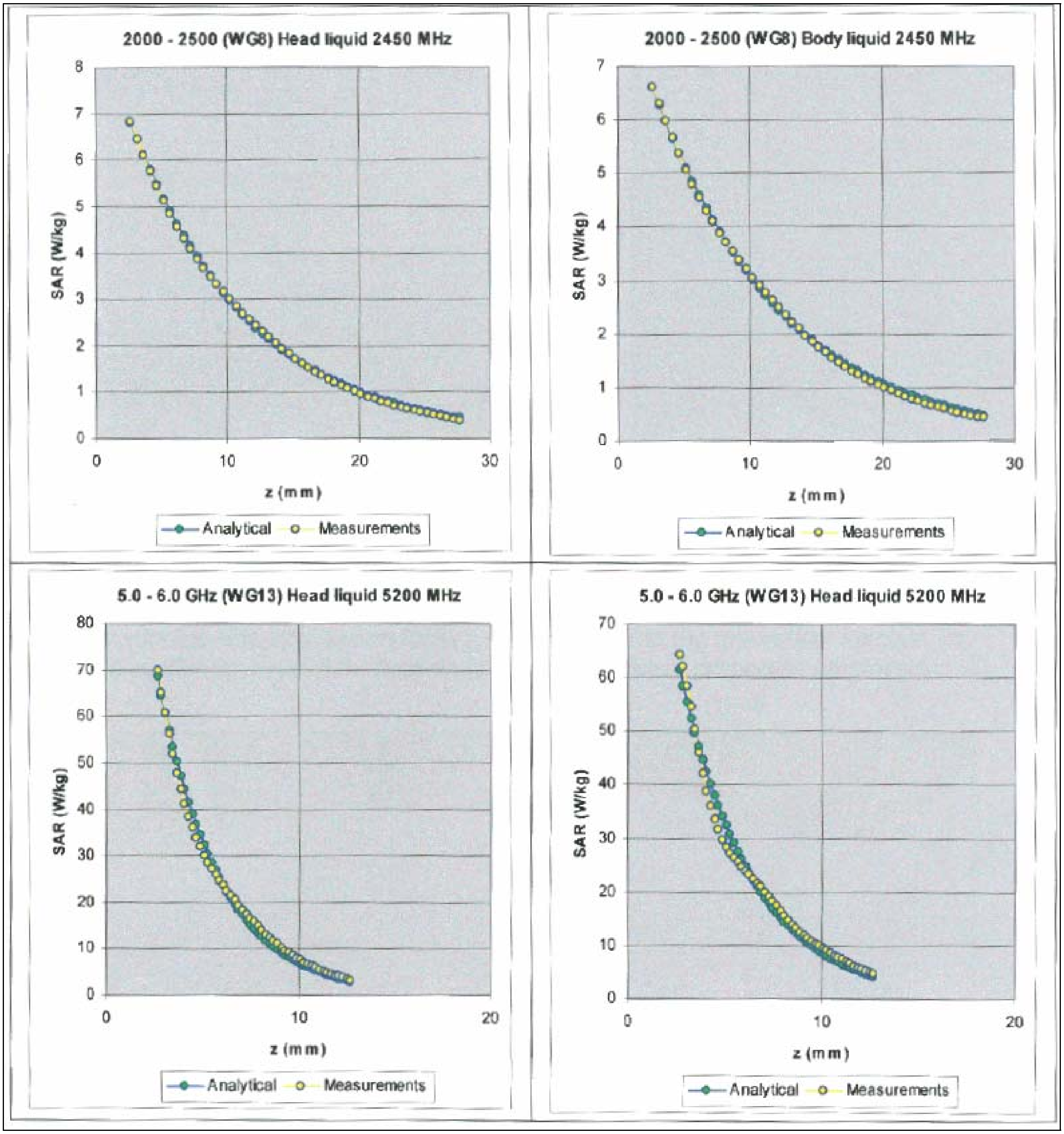


Copyright 2006, MET Laboratories, Inc.


2000 - 2500 (WG8) Head liquid 2450 MHz
SAR (W/kg)
z (mm)
Analytical
Measurements
2000 - 2500 (WG8) Body liquid 2450 MHz
SAR (W/kg)
z (mm)
Analytical
Measurements
5.0 - 6.0 GHz (WG13) Head liquid 5200 MHz
SAR (W/kg)
z (mm)
Analytical
Measurements
5.0 - 6.0 GHz (WG13) Head liquid 5200 MHz
SAR (W/kg)
z (mm)
Analytical
Measurements

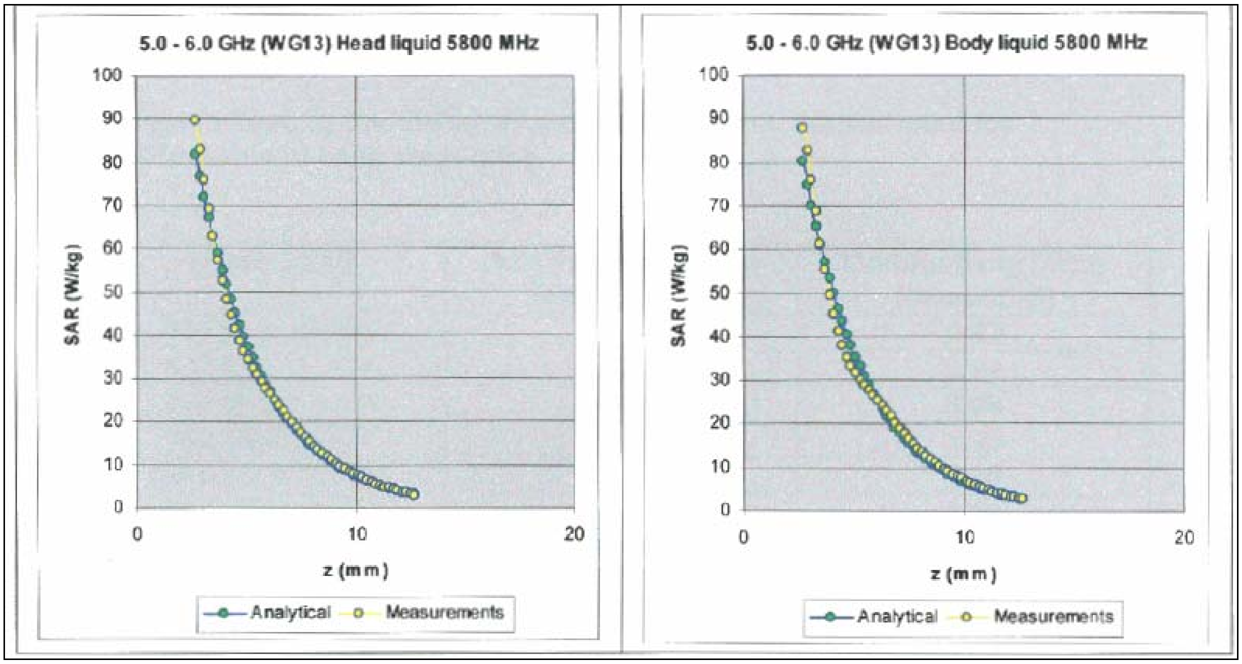


Figure 5. The measured SAR decay function along the centerline of the R22 waveguide with conversion factors adjusted to fit to the theoretical function for the particular dimension, frequency, power and liquid properties employed.

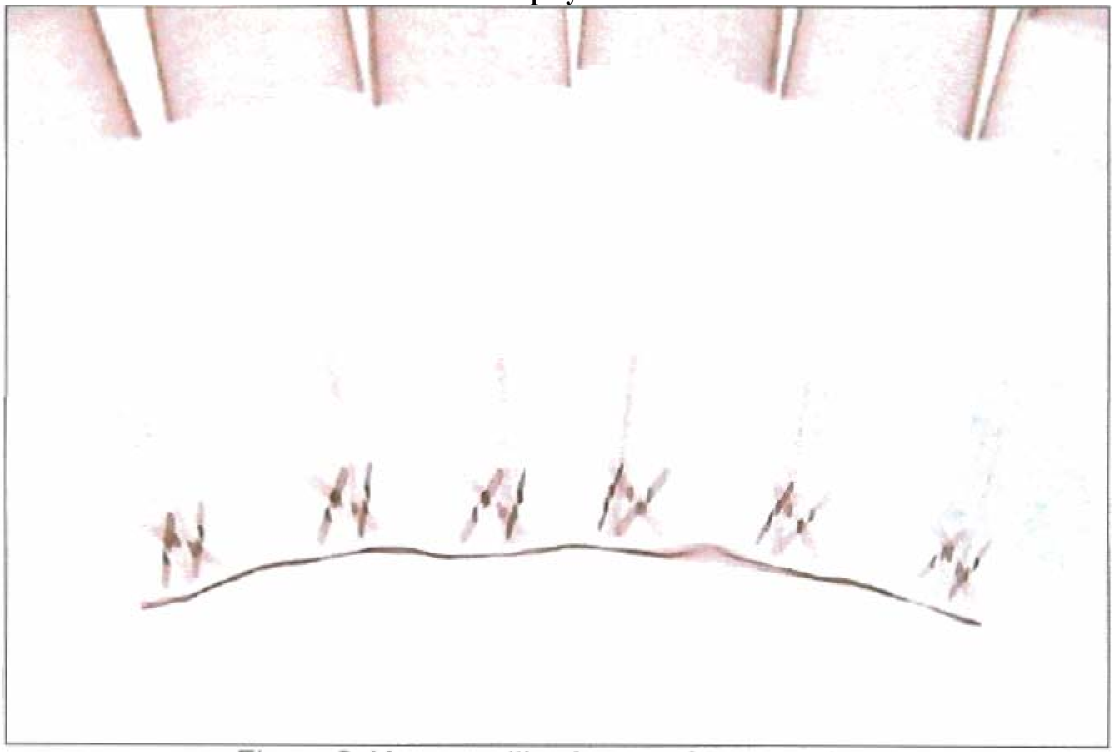
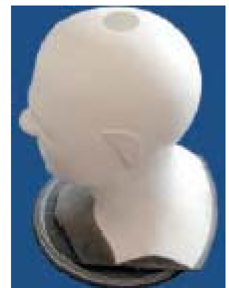


Figure 6. X-ray positive image of 5mm probes.

PHANTOMS

SAM Twin Horizontal Phantom per IEEE Draft 1528

The SAM Twin Horizontal is fabricated to the CAD files as specified by FCC OET 65 Supplement C 01-01 and IEEE Draft 1528. It is mounted on a dielectric table which includes mounting brackets for EUT positioners and a shelf for dipole holders. The phantom has three integrated positioning reference points.



SAM Upright Phantom per FCC OET 65 Supplement C 01-01 and IEEE Draft 1528. The SAM Upright Phantom is fabricated to the CAD files as specified by FCC and IEEE. It is mounted on the base table which holds the robotic positioner. The phantom and robot alignment is assured by both mechanical and laser registration systems.

Flat Bath Phantom for testing above 800 MHz

The Flat Bath Box Phantom is fabricated to the specifications of the OET 65 Supplement C and CENELEC EN50361 standard. It is mounted on a similar rotational base to that of which the SAM upright phantom is attached to. It is positioned in place of the SAM upright head when doing validations or flat bath testing**.**

Phantom Specifications

Phantom Type	Material	Permittivity (ε)	Conductivity (σ - S/m)
SAM Upright Phantom	**Head:polyurethane Resin Base:PVC**	**<3.15 above 200 MHz**	**<0.02 below 2 GHz**
Box Phantom	**Clear: Perspex**	**<2.85 above 500 MHz**	**<0.015 below 2 GHz**

Phantom Properties

Experience has shown that SAR results can vary considerably when plastic or material fixtures used to position the test devices are too close to the antennas (especially for phones with internal antennas). The MapSAR positioner has been designed to have no support material close the top of the phone and is arranged so that the phone pivots around the earpiece position. The positioner gives a range of phone angles from the starting touch position to +15º as required by FCC or EN 50361 or any position within a range of 30º. A graduated scale allows for easy setting. Adjustment is made by means of simple hand screws. For tests requiring phantom hands or hand material, space is made available behind the phone.

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Measurement Procedure

The major components of the test bench are shown in the picture above. A test set and dipole antenna control the handset via an air link and a low-mass phone holder can position the phone at either ear. Graduated scales are provided to set the phone in the 15 degree position. The upright phantom head holds approx. 7 liters of simulant liquid. The phantom is filled and emptied through a 45mm diameter penetration hole in the top of the head.

After an area scan has been performed at a fixed distance of 8mm from the surface of the phantom on the source side, a 3D scan is set up around the location of the maximum spot SAR. First, a point within the scan area is visited by the probe and a SAR reading taken at the start of testing. At the end of testing, the probe is returned to the same point and a second reading is taken. Comparison between these start and end readings enables the power drift during measurement to be assessed.

SARA2 Interpolation and Extrapolation schemes

SARA2 software contains support for both 2D cubic B-spline interpolation as well as 3D cubic B-spline interpolation. In addition, for extrapolation purposes, a general n-th order polynomial fitting routine is implemented following a singular value decomposition algorithm presented in [4]. A 4th order polynomial fit is used by default for data extrapolation, but a linear-logarithmic fitting function can be selected as an option. The polynomial fitting procedures have been tested by comparing the fitting coefficients generated by the SARA2 procedures with those obtained using the polynomial fit functions of Microsoft Excel when applied to the same test input data.

Interpolation of 2D area scan

The 2D cubic B-spline interpolation is used after the initial area scan at fixed distance from the phantom shell wall. The initial scan data are collected with approx. 10mm spatial resolution and spline interpolation is used to find the location of the local maximum to within a 1mm resolution for positioning the subsequent 3D scanning.

Extrapolation of 3D scan

For the 3D scan, data are collected on a spatially regular 3D grid having (by default) 6.4 mm steps in the lateral dimensions and 3.5 mm steps in the depth direction (away from the source). SARA2 enables full control over the selection of alternative step sizes in all directions.

The digitized shape of the head is available to the SARA2 software, which decides which points in the 3D array are sufficiently well within the shell wall to be ‘visited' by the SAR probe. After the data collection, the data are extrapolated in the depth direction to assign values to points in the 3D array closer to the shell wall. A notional extrapolation value is also assigned to the first point outside the shell wall so that subsequent interpolation schemes will be applicable right up to the shell wall boundary.

Interpolation of 3D scan and volume averaging

The procedure used for defining the shape of the volumes used for SAR averaging in the SARA2 software follow the method of adapting the surface of the ‘cube' to conform with the curved inner surface of the phantom. This is called, here, the conformal scheme.

For each row of data in the depth direction, the data are extrapolated and interpolated to less than 1mm spacing and average values are calculated from the phantom surface for the row of data over distances corresponding to the requisite depth for 1g and 1g cubes. This results in two 2D arrays of data, which are then cubic B-spline interpolated to sub mm lateral resolution. A search routine then moves an averaging square around through the 2D array and records the maximum value of the Corresponding 1g and 1g volume averages. For the definition of the surface in this procedure, the digitized position of the head shell surface is used for measurement in head-shaped phantoms. For measurements in rectangular, box phantoms, the distance between the phantom wall and the closest set of gridded data points is entered into the software.

For measurements in box-shaped phantoms, this distance is under the control of the user. The effective distance must be greater than 2.5mm as this is the tip-sensor distance and to avoid interface proximity effects, it should be at least 5mm. A value of 6 or 8mm is recommended. This distance is called dbe in EN 50361.

For automated measurements inside the head, the distance cannot be less than 2.5mm, which is the radius of the probe tip and to avoid interface proximity effects, a minimum clearance distance of x mm is retained. The actual value of dbe will vary from point to point depending upon how the spatially-regular 3D grid points fit within the shell. The greatest separation is when a grid point is just not visited due to the probe tip dimensions. In this case the distance could be as large as the step-size plus the minimum clearance distance (i.e with x=5 and a step size of 3.5, dbe will be between 3.5 and 8.5mm).

The default step size (dstep in EN 50361) used is 3.5mm, but this is under user-control. The compromise is with time of scan, so it is not practical to make it much smaller or scan times become long and power-drop influences become larger. The robot positioning system specification for the repeatability of the positioning (dss in EN50361) is +/- 0.04mm.

The phantom shell is made by an industrial molding process from the CAD files of the SAM shape, with both internal and external moulds. For the upright phantoms, the external shape is subsequently digitised on a Mitutoyo CMM machine (Euro C574) to a precision of 0.001mm. Wall thickness measurements made non-destructively with an ultrasonic sensor indicate that the shell thickness (dph) away from the ear is 2.0 +/- 0.1mm. The ultrasonic measurements were calibrated using additional mechanical measurements on available cut surfaces of the phantom shells. See support document IXS-020x.

For the upright phantom, the alignment is based upon registration of the rotation axis of the phantom on its 253mm diameter baseplate bearing and the position of the probe axis when commanded to go to the axial position. A laser alignment tool is provided (procedure detailed elsewhere). This enables the registration of the phantom tip (dmis) to be assured to within approx. 0.2mm. This alignment is done with reference to the actual probe tip after installation and probe alignment. The rotational positioning of the phantom is variable – offering advantages for special studies, but locating pins ensure accurate repositioning at the principal positions (LH and RH ears).

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Table Of Uncertainty Values using new preferred draft IEEE1528 Template
(blue entries are site-specific)

Uncertainty Component	Sec.		Tol. (+/-)		Prob. Dist.	Divisor (descrip)	Divisor (value)	c1	Standard Uncertainty (%)	
		(dB)		(%)						
Measurement System										
Probe Calibration	E1.1			10	N	1 or k	2	1	5.00	25.00
Axial Isotropy	E1.2	0.25	5.93	5.93	R	•3	1.73	0	0.00	0.00
Hemispherical Isotropy	E1.2	0.45	10.92	10.92	R	•3	1.73	1	6.30	39.73
Boundary effects	E1.3		4	4.00	R	•3	1.73	1	2.31	5.33
Linearity	E1.4	0.04	0.93	0.93	R	•3	1.73	1	0.53	0.29
System Detection Limits	E1.5		1	1.00	R	•3	1.73	1	0.58	0.33
Readout Electronics	E1.6		1	1.00	N	1 or k	1.00	1	1.00	1.00
Response time	E1.7		0	0.00	R	•3	1.73	1	0.00	0.00
Integration time	E1.8		1.8	1.80	R	•3	1.73	1	1.04	1.08
RF Ambient Conditions	E5.1		3	3.00	R	•3	1.73	1	1.73	3.00
Probe Positioner Mechanical Tolerance	E5.2		0.6	0.60	R	•3	1.73	1	0.35	0.12
Probe Position wrt. Phantom Shell	E5.3		5	5.00	R	•3	1.73	1	2.89	8.33
SAR Evaluation Algorithms	E4.2		8	8.00	R	•3	1.73	1	4.62	21.33
Test Sample Related										
Test Sample Positioning	E3.2.1		10	10.00	R	•3	1.73	1	5.77	33.33
Device Holder Uncertainty	E3.1.1		10	10.00	R	•3	1.73	1	5.77	33.33
Output Power Variation	E5.6.2		5	5.00	R	•3	1.73	1	2.89	8.33
Phantom and Tissue Parameters										
Phantom Uncertainty (shape and thickness)	E2.1		4	4.00	R	•3	1.73	0.5	1.15	1.33
Liquid conductivity (Deviation from target)	E2.2		5	5.00	R	•3	1.73	0.5	1.44	2.08
Liquid conductivity (measurement uncert.)	E2.2		10	10.00	R	•3	1.73	0.5	2.89	8.33
Liquid permittivity (Deviation from target)	E2.2		5	5.00	R	•3	1.73	0.5	1.44	2.08
Liquid permittivity (measurement uncert.)	E2.2		5	5.00	R	•3	1.73	0.5	1.44	2.08
Combined standard uncertainty					RSS			14.0		
Expanded uncertainty	(95% Confidence Level)							**27.5**		

Table 8. Uncertainty budget of SARA2

Table 8 includes the preliminary uncertainty budget. The expanded uncertainty is assessed to be 27.5%. This uncertainty includes probe calibration, positioning and evaluation errors, as well as errors of the correct dielectric parameters for the tissue simulating liquid, etc.

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Appendix

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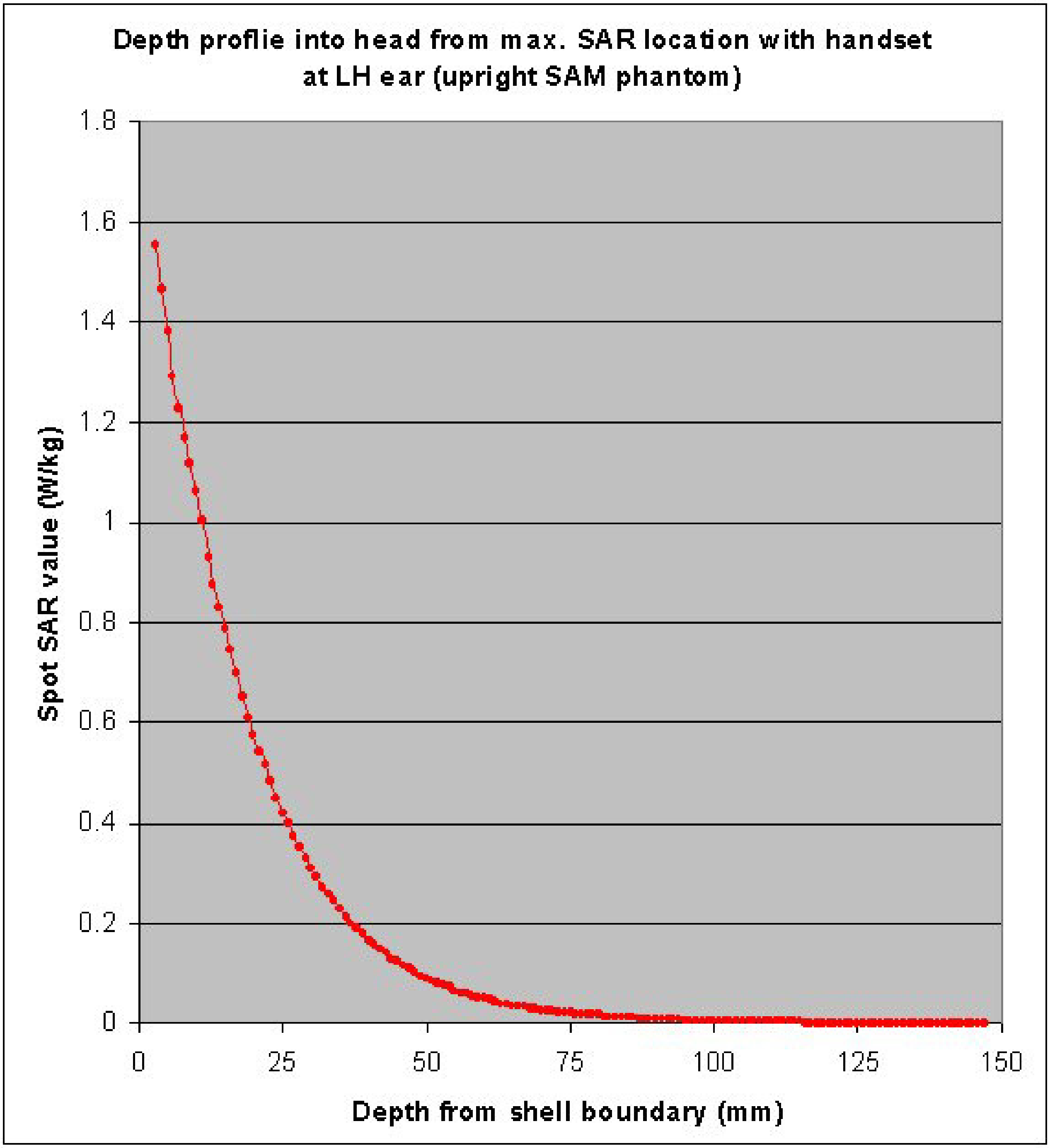
Z-SCAN PLOTS


Depth proflie into head from max. SAR location with handset at LH ear (upright SAM phantom)
Spot SAR value (W/kg)
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
0
25
50
75
100
125
150
Depth from shell boundary (mm)

FCC Exposure Criteria

In the USA the recent FCC exposure criteria [FCC 2001] are based upon the IEEE Standard C95.3 [IEEE 2002]. The IEEE standard C95.3 2002 sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz.

2.1 Distinction Between Exposed Population, Duration of Exposure and Frequencies

The American Standard [IEEE 2002] distinguishes between controlled and uncontrolled environment. Controlled environments are locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment or by other cognizant persons. Uncontrolled environments are locations where there is the exposure of individuals who have no knowledge or control of their exposure. The exposures may occur in living quarters or workplaces. For exposure in controlled environments higher field strengths are admissible. In addition the duration of exposure is considered.

Due to the influence of frequency on important parameters, as the penetration depth of the electromagnetic fields into the human body and the absorption capability of different tissues, the limits in general vary with frequency.

2.2 Distinction between Maximum Permissible

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength E inside the human body, the conductivity s and the mass density r of the biological tissue:

$$SAR = \sigma \frac{E^2}{\rho}$$

The specific absorption rate describes the initial rate of temperature rise as a function of the specific heat capacity c of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric E and magnetic field strength H and power density S, derived from the SAR limits. The limits for E, H and S have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded. For the relevant frequency range the maximum permissible exposure may be exceeded if the exposure can be shown by appropriate techniques to produce SAR values below the corresponding limits.

2.3 SAR Limit

In this report the comparison between the American exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded. Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 1 g (SAR1g) with the shape of a cube.

Standard	Status	SAR limit [W/kg]
OET 65 Supplement C Edition 01-01	In Force	1.6

SAR Limit

The FCC Measurement Procedure

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The Federal Communications Commission (FCC) has published a report and order on the 1 st of August 1996 [FCC 1996], which requires routine dosimetric assessment of mobile telecom-communications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65.
This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radio frequency emissions [FCC 2001].

General Requirements
The test shall be performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature shall be in the range of 20°C to 26°C and 30-70% humidity.

Device Operating Next to a Person's Ear
3.2.1 Phantom Requirements
The phantom is a simplified representation of the human anatomy and comprised of material with electrical properties similar to the corresponding tissues. The physical characteristics of the phantom model shall resemble the head and the neck of a user since the shape is a dominant parameter for exposure.

Test Positions
As it cannot be expected that the user will hold the mobile phone exactly in one well defined position, different operational conditions shall be tested. The Supplement C to OET Bulletin 65 requires two test positions. For an exact description helpful geometrical definitions are introduced and shown in Fig. 2 - 3.
There are two imaginary lines on the mobile, the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width wt of the handset at the level of the acoustic output (point A on Fig. 2), and the midpoint of the width wb of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Fig. 2). The two lines intersect at point A.

According to Fig. 3 the human head position is given by means of the following three reference points: auditory canal opening of both ears (RE and LE) and the center of the closed mouth (M). The ear reference points are 15-17 mm above the entrance to the ear canal along the BM line (back-mouth), as shown in Fig. 3. The plane passing through the two ear canals and M is defined as the reference plane. The line NF (Neck-Front) perpendicular to the reference plane and passing through the RE (or LE) is called the reference pivoting line. Line BM is perpendicular to the NF line. With this definitions the test positions are given by;

Cheek position (see Fig. 4):
Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Fig. 3), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom. Translate the handset towards the phantom along the line passing through RE and LE until the handset touches the ear. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane). Rotate the phone around the vertical centerline until the phone (horizontal line) is symmetrical with respect to the line NF. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, rotate the handset about the line NF until any point on the handset is in contact with a phantom point below the ear. While maintaining the orientation of the phone retract the phone parallel to the reference plane far enough to enable a rotation of the phone by 15°. Rotate the phone around the horizontal line by 15°. While maintaining the orientation of the phone, move the phone parallel to the reference plane until any part of the phone touches the head. In this position, point A will be located on the line RE-LE.

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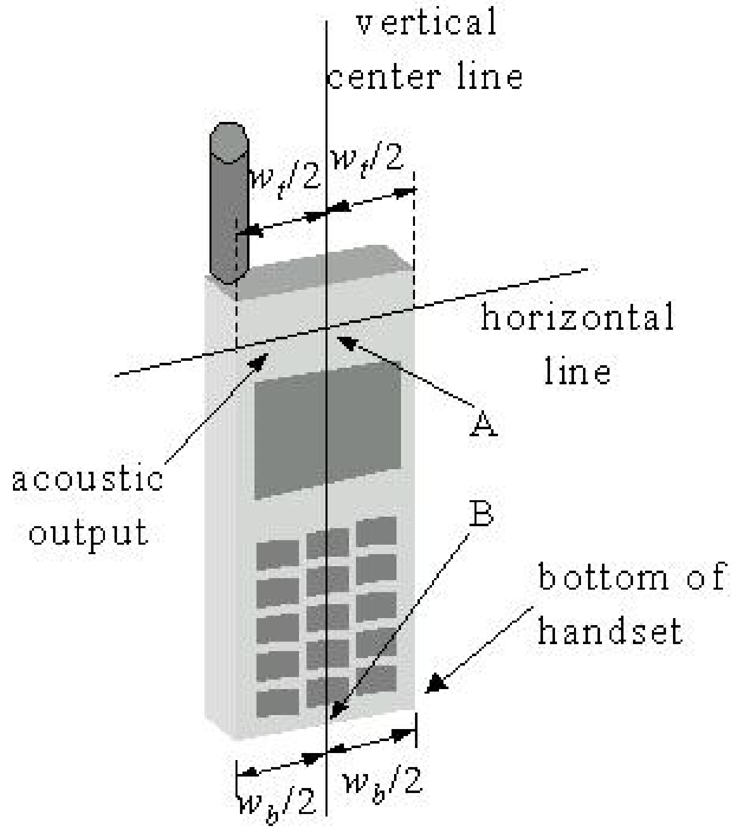

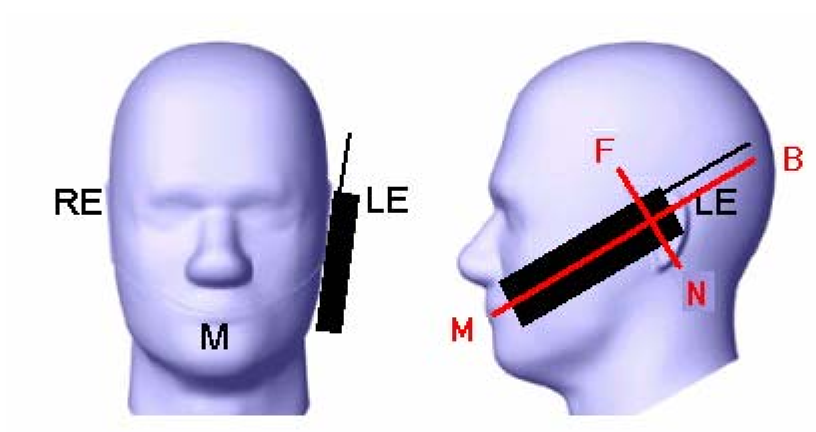

Phantom reference points.

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Test to be Performed

The SAR test shall be performed with both phone positions described above, on the left and right side of the phantom. The device shall be measured for all modes operating when the device is next to the ear, even if the different modes operate in the same frequency band.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value. The SAR test shall be performed at the high, middle and low frequency channels of each operating mode. If the SAR measured at the middle channel for each test configuration is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional.

Body-worn and Other Configurations

Phantom Requirements

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

Test Position

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration. Devices with a headset output shall be tested with a connected headset.

Test to be Performed

For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do. For multiple accessories that do not contain metallic components, the device may be tested only with that accessory which provides the closest spacing to the body.

For multiple accessories that contain metallic components, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component, only the accessory that provides the closest spacing to the body must be tested.

If the manufacturer provides none body-worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value. The SAR test shall be performed at the high, middle and low frequency channels of each operating mode. If the SAR measured at the middle channel for each test configuration is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional.

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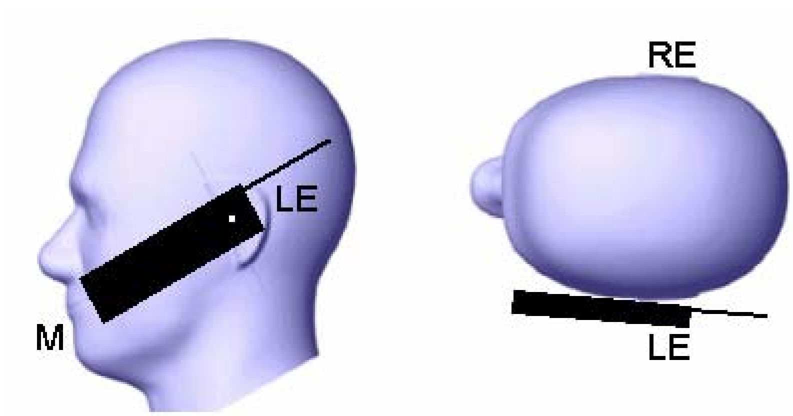
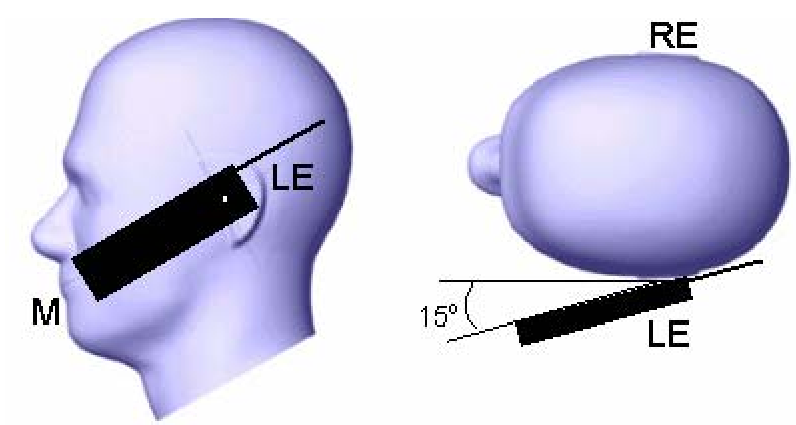


The cheek position.



The tilted position

List of Terms and Abbreviations

AC	Alternating Current
ANSI	American National Standards Institute
Cal	Calibration
d	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
EUT	Equipment Under Test
f	Frequency
FCC	Federal Communications Commission
CISPR	Comite International Special des Perturbations Radioelectriques (International Special Committee on Radio Interference)
GRP	Ground Reference Plane
H	Magnetic Field
Hz	Hertz
IEC	International Electrotechnical Commission
IEEE	Institute for Electrical and Electronic Engineers
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
MPE	Maximum Permissible Exposure
μH	microhenry
μF	microfarad
μs	microseconds
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
SAR	Specific Absorption Rate
TWT	Traveling Wave Tube
V/m	Volts per meter

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End of Report

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