

SAR EVALUATION REPORT

For

INGENICO CANADA LTD

79 Torbarrie Road, Toronto
Ontario M3L 1G5, Canada

FCC ID: O34-E790CDMA

This Report Concerns: <input checked="" type="checkbox"/> Class II Permissive Change	Equipment Type: Wireless Point of Sale Terminal
Test Engineer: Eric Hong / 	
Report No.: R0402233S	
Report Date: 2004-04-09	
Reviewed By: Hans Mellberg/ 	
Prepared By: Bay Area Compliance Laboratory Corporation 230 Commercial Street Sunnyvale, CA 94085 Tel: (408) 732-9162 Fax: (408) 732 9164	

Note: This test report is specially limited to the above client company and the product model only. It may not be duplicated without prior written consent of Bay Area Compliance Laboratory Corporation. This report **must not** be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government.

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SUMMARY

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996 [1].

The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). According to the Supplement C of OET Bulletin 65 "Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

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

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

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

There was no SAR of any concern measured on the device for any of the investigated configurations, please see following table for testing result summary:

1 - REFERENCE

- [1] Federal Communications Commission, "Report and order: Guidelines for evaluating the environmental effects of radiofrequency radiation", Tech. Rep. FCC 96-326, FCC, Washington, D.C. 20554, 1996.
- [2] David L. Means Kwok Chan, Robert F. Cleveland, "Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields", Tech. Rep., Federal Communication Commission, Office of Engineering & Technology, Washington, DC, 1997.
- [3] Thomas Schmid, Oliver Egger, and Niels Kuster, "Automated E-field scanning system for dosimetric assessments", IEEE Transactions on Microwave Theory and Techniques, vol. 44, pp. 105-113, Jan. 1996.
- [4] Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetric evaluation of mobile communications equipment with known precision", IEEE Transactions on Communications, vol. E80-B, no. 5, pp. 645-652, May 1997.
- [5] CENELEC, "Considerations for evaluating of human exposure to electromagnetic fields (EMFs) from mobile telecommunication equipment (MTE) in the frequency range 30MHz - 6GHz", Tech. Rep., CENELEC, European Committee for Electrotechnical Standardization, Brussels, 1997.
- [6] ANSI, ANSI/IEEE C95.1-1992: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992.
- [7] Katja Pokovic, Thomas Schmid, and Niels Kuster, "Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies", in ICECOM '97, Dubrovnik, October 15-17, 1997, pp. 120-24.
- [8] Katja Pokovic, Thomas Schmid, and Niels Kuster, "E-field probe with improved isotropy in brain simulating liquids", in Proceedings of the ELMAR, Zadar, Croatia, 23-25 June, 1996, pp. 172-175.
- [9] Volker Hombach, Klaus Meier, Michael Burkhardt, Eberhard Kuhn, and Niels Kuster, "The dependence of EM energy absorption upon human head modeling at 900 MHz", IEEE Transactions on Microwave Theory and Techniques, vol. 44, no. 10, pp. 1865-1873, Oct. 1996.
- [10] Klaus Meier, Ralf Kastle, Volker Hombach, Roger Tay, and Niels Kuster, "The dependence of EM energy absorption upon human head modeling at 1800 MHz", IEEE Transactions on Microwave Theory and Techniques, Oct. 1997, in press.
- [11] W. Gander, Computermathematik, Birkhaeuser, Basel, 1992.
- [12] W. H. Press, S. A. Teukolsky, W. T. Vetterling, and B. P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second Edition, Cambridge University Press, 1992. Dosimetric Evaluation of Sample device, month 1998 9
- [13] NIS81 NAMAS, "The treatment of uncertainty in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddington, Middlesex, England, 1994.
- [14] Barry N. Taylor and Christ E. Kuyatt, "Guidelines for evaluating and expressing the uncertainty of NIST measurement results", Tech. Rep., National Institute of Standards and Technology, 1994. Dosimetric Evaluation of Sample device, month 1998 10

2 - TESTING EQUIPMENT

Type / Model	Cal. Date	S/N:
DASY3 Professional Dosimetric System	N/A	N/A
Robot RX60L	N/A	F00/5H31A1/A/01
Robot Controller	N/A	F01/5J72A1/A/01
Dell Computer Optiplex GX110	N/A	N/A
Pentium III, Windows NT	N/A	N/A
SPEAG EDC3	N/A	N/A
SPEAG DAE3	6/04	456
SPEAG E-Field Probe ET3DV6	9/7/02	1604
SPEAG Dummy Probe	N/A	N/A
SPEAG Generic Twin Phantom	N/A	N/A
SPEAG Light Alignment Sensor	N/A	278
Apprel Validation Dipole D-1800-S-2	11/6/04	BCL-049
SPEAG Validation Dipole D900V2	9/3/04	122
Brain Equivalent Matter (800MHz)	Daily	N/A
Brain Equivalent Matter (1900MHz)	Daily	N/A
Brain Equivalent Matter (2450MHz)	Daily	N/A
Muscle Equivalent Matter (800MHz)	Daily	N/A
Muscle Equivalent Matter (1900MHz)	Daily	N/A
Muscle Equivalent Matter (2450MHz)	Daily	N/A
Robot Table	N/A	N/A
Phone Holder	N/A	N/A
Phantom Cover	N/A	N/A
HP Spectrum Analyzer HP8593GM	6/20/04	3009A00791
Microwave Amp. 8349B	N/A	2644A02662
Power Meter HP436A	4/2/04	2709A29209
Power Sensor HP8482A	4/2/04	2349A08568
Signal Generator RS SMIQ O3	2/10/04	1084800403
Network Analyzer HP-8753ES	7/30/04	820079
Dielectric Probe Kit HP85070A	N/A	N/A
Apprel Validation Dipole D-2450-S-1	10/1/04	BCL-141
Dipole Antenna AD-100 (450MHz)	5/7/04	02220

2.2 Equipment Calibration Certificate

Please see the attached file.

**Calibration Laboratory of
Schmid & Partner
Engineering AG**
Zeughausstrasse 43, 8004 Zurich, Switzerland

Client Bay Area Comp. Lab (BACL)

CALIBRATION CERTIFICATE

Object(s) E33DV2 - SN:3019

Calibration procedure(s) QA CAL-01.v2
Calibration procedure for dosimetric E-field probes

Calibration date: October 9, 2003

Condition of the calibrated item In Tolerance (according to the specific calibration document)

This calibration statement documents traceability of M&TE used in the calibration procedures and conformity of the procedures with the ISO/IEC 17025 international standard.

All calibrations have been conducted in the closed laboratory facility: environment temperature 22 +/- 2 degrees Celsius and humidity < 75%.

Calibration Equipment used (M&TE critical for calibration)

Model Type	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter EPM E4419B	GB41293874	2-Apr-03 (METAS, No 252-0250)	Apr-04
Power sensor E4412A	MY41495277	2-Apr-03 (METAS, No 252-0250)	Apr-04
Reference 20 dB Attenuator	SN: 5086 (20b)	3-Apr-03 (METAS No. 251-0340)	Apr-04
Fluke Process Calibrator Type 702	SN: 6295803	8-Sep-03 (Sintrel SCS No. E-030020)	Sep-04
Power sensor HP 8481A	MY41092180	18-Sep-02 (Agilent, No. 20020918)	In house check: Oct 03
RF generator HP 8684C	US3642U01700	4-Aug-99 (SPEAG, in house check Aug-02)	In house check: Aug-05
Network Analyzer HP 8753E	US37390585	18-Oct-01 (Agilent, No. 24BR1033101)	In house check: Oct 03

	Name	Function	Signature
Calibrated by:	Nico Vetter	Technician	
Approved by:	Katja Rokovic	Laboratory Director	

Date issued: October 9, 2003

This calibration certificate is issued as an intermediate solution until the accreditation process (based on ISO/IEC 17025 international Standard) for Calibration Laboratory of Schmid & Partner Engineering AG is completed.

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Probe ES3DV2

SN:3019

Additional Conversion Factors

Manufactured:	December 5, 2002
Last calibration:	July 12, 2003
Add. calibration:	October 9, 2003

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

DASY - Parameters of Probe: ES3DV2 SN:3019**Sensitivity in Free Space**

NormX	1.05 $\mu\text{V}/(\text{V}/\text{m})^2$
NormY	1.14 $\mu\text{V}/(\text{V}/\text{m})^2$
NormZ	0.98 $\mu\text{V}/(\text{V}/\text{m})^2$

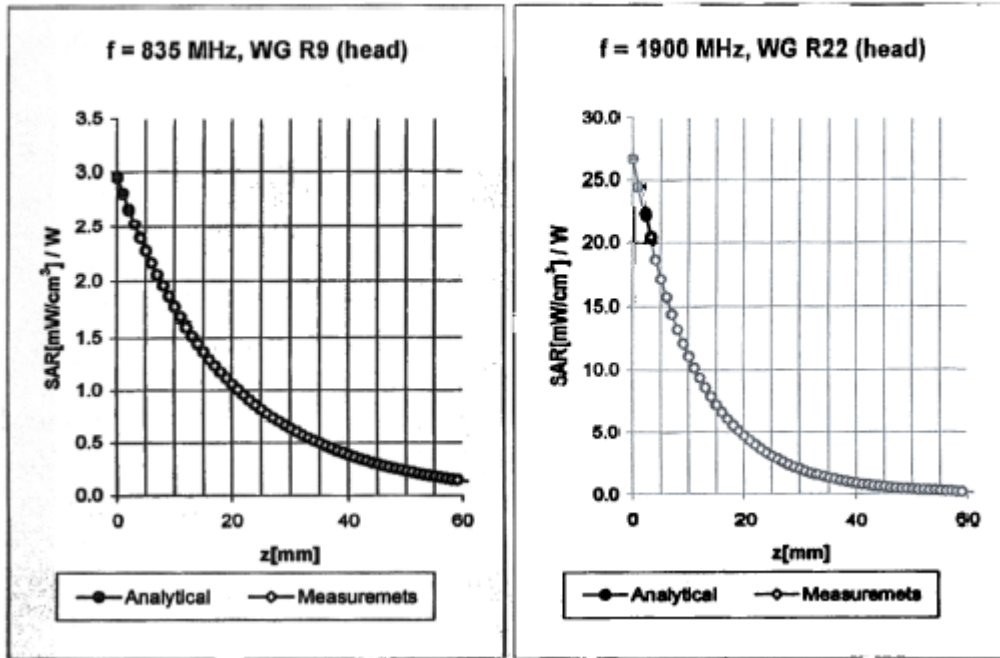
Diode Compression

DCP X	99
DCP Y	99
DCP Z	99

Sensor Offset

Probe Tip to Sensor Center	2.1	mm
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Conversion Factor Assessment



Head 835 MHz $\epsilon_r = 41.5 \pm 5\%$ $\sigma = 0.90 \pm 5\%$ mho/m

Valid for f=793-877 MHz with Head Tissue Simulating Liquid according to EN 50361, P1528-200X

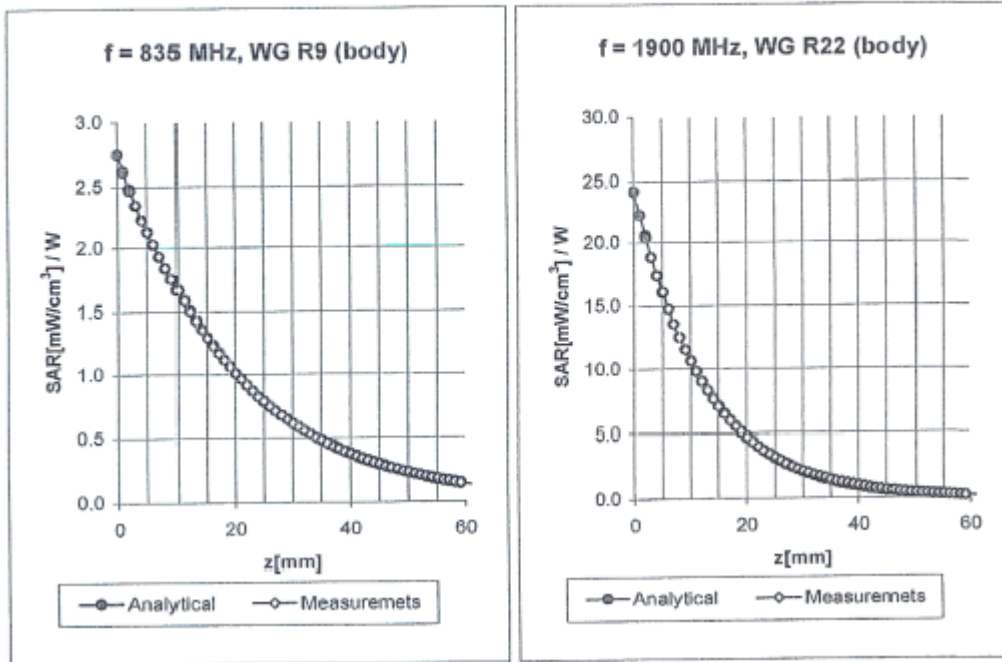
ConvF X	6.5 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	6.5 ± 9.5% (k=2)	Alpha	0.35
ConvF Z	6.5 ± 9.5% (k=2)	Depth	1.46

Head 1900 MHz $\epsilon_r = 40.0 \pm 5\%$ $\sigma = 1.40 \pm 5\%$ mho/m

Valid for f=1805-1995 MHz with Head Tissue Simulating Liquid according to EN 50361, P1528-200X

ConvF X	4.7 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	4.7 ± 9.5% (k=2)	Alpha	0.22
ConvF Z	4.7 ± 9.5% (k=2)	Depth	3.48

Conversion Factor Assessment



Body **835 MHz** $\epsilon_r = 55.2 \pm 5\%$ $\sigma = 0.97 \pm 5\% \text{ mho/m}$

Valid for f=793-877 MHz with Body Tissue Simulating Liquid according to OET 65 Suppl. C

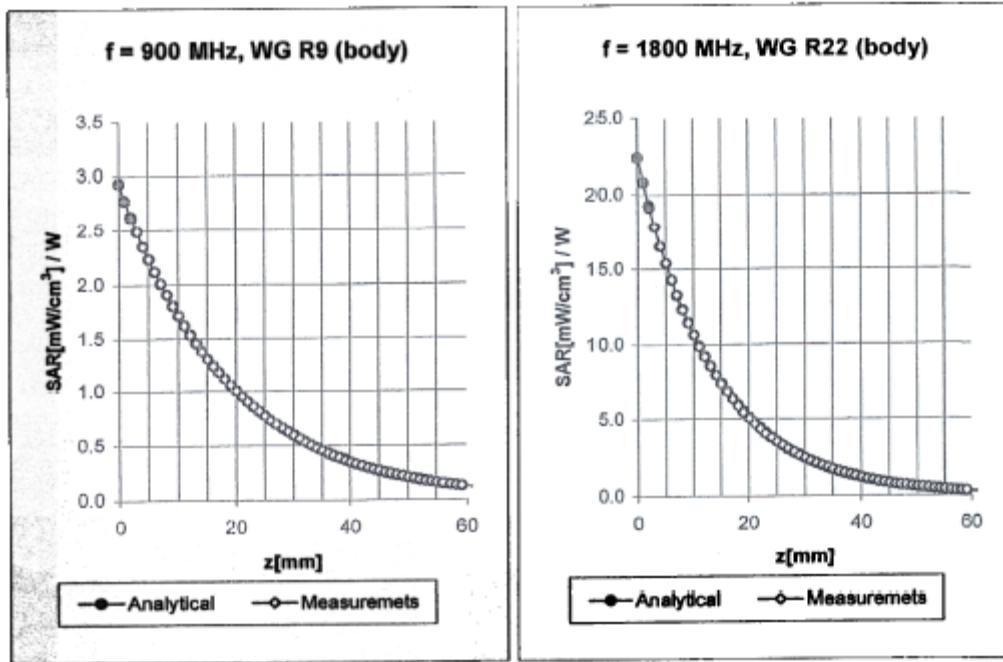
ConvF X	6.1 $\pm 9.5\%$ (k=2)	Boundary effect:
ConvF Y	6.1 $\pm 9.5\%$ (k=2)	Alpha 0.24
ConvF Z	6.1 $\pm 9.5\%$ (k=2)	Depth 2.00

Body **1900 MHz** $\epsilon_r = 53.3 \pm 5\%$ $\sigma = 1.52 \pm 5\% \text{ mho/m}$

Valid for f=1805-1995 MHz with Body Tissue Simulating Liquid according to OET 65 Suppl. C

ConvF X	4.6 $\pm 9.5\%$ (k=2)	Boundary effect:
ConvF Y	4.6 $\pm 9.5\%$ (k=2)	Alpha 0.24
ConvF Z	4.6 $\pm 9.5\%$ (k=2)	Depth 2.64

Conversion Factor Assessment



Body 900 MHz $\epsilon_r = 55.0 \pm 5\%$ $\sigma = 1.05 \pm 5\%$ mho/m

Valid for f=855-945 MHz with Body Tissue Simulating Liquid according to OET 65 Suppl. C

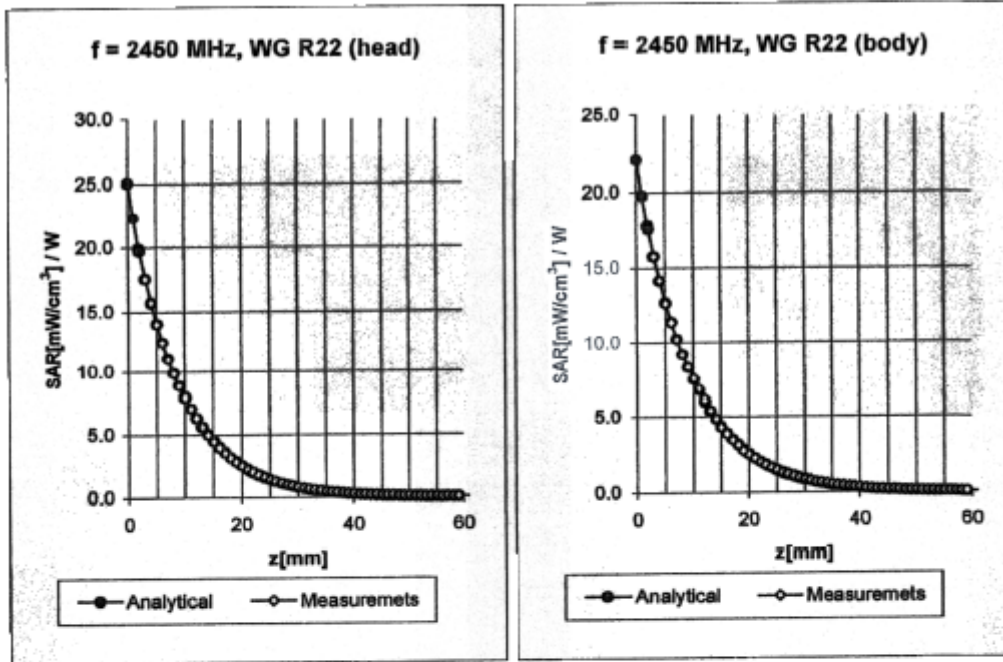
ConvF X	6.1 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	6.1 ± 9.5% (k=2)	Alpha	0.27
ConvF Z	6.1 ± 9.5% (k=2)	Depth	1.82

Body 1800 MHz $\epsilon_r = 53.3 \pm 5\%$ $\sigma = 1.52 \pm 5\%$ mho/m

Valid for f=1710-1890 MHz with Body Tissue Simulating Liquid according to OET 65 Suppl. C

ConvF X	4.7 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	4.7 ± 9.5% (k=2)	Alpha	0.23
ConvF Z	4.7 ± 9.5% (k=2)	Depth	2.99

Conversion Factor Assessment



Head **2450 MHz** $\epsilon_r = 39.2 \pm 5\%$ $\sigma = 1.80 \pm 5\%$ mho/m

Valid for f=2400-2500 MHz with Head Tissue Simulating Liquid according to EN 60381, P1528-200X

ConvF X	4.5 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	4.5 ± 9.5% (k=2)	Alpha	0.40
ConvF Z	4.5 ± 9.5% (k=2)	Depth	1.62

Body **2450 MHz** $\epsilon_r = 52.7 \pm 5\%$ $\sigma = 1.95 \pm 5\%$ mho/m

Valid for f=2400-2500 MHz with Body Tissue Simulating Liquid according to OET 65 Suppl. C

ConvF X	4.2 ± 9.5% (k=2)	Boundary effect:	
ConvF Y	4.2 ± 9.5% (k=2)	Alpha	0.32
ConvF Z	4.2 ± 9.5% (k=2)	Depth	1.98

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Additional Conversion Factors for Dosimetric E-Field Probe

Type:	ES3DV2
Serial Number:	3019
Place of Assessment:	Zurich
Date of Assessment:	October 13, 2003
Probe Calibration Date:	October 9, 2003

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

Assessed by:



ES3DV2-SN:3019

October 13, 2003

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Dosimetric E-Field Probe ES3DV2 SN:3019

Conversion factor (\pm standard deviation)

150 MHz	ConvF	8.7 \pm 8%	$\epsilon_r = 52.3 \pm 5\%$ $\sigma = 0.76 \pm 5\%$ mho/m (head tissue)
150 MHz	ConvF	8.3 \pm 8%	$\epsilon_r = 61.9 \pm 5\%$ $\sigma = 0.80 \pm 5\%$ mho/m (body tissue)
450 MHz	ConvF	7.4 \pm 8%	$\epsilon_r = 43.5 \pm 5\%$ $\sigma = 0.87 \pm 5\%$ mho/m (head tissue)
450 MHz	ConvF	7.3 \pm 8%	$\epsilon_r = 56.7 \pm 5\%$ $\sigma = 0.94 \pm 5\%$ mho/m (body tissue)

ES3DV2-SN:3019

October 13, 2003

835 MHz Body Liquid Validation

8350MHZ Body Liquid validation
 Ambient Temp=23 DegC ,Liquid Temp=22 DegC 3/24/2004

frequency	e'	e''
815000000.0000	53.2565	21.4858
815800000.0000	53.2224	21.4201
816600000.0000	53.2008	21.4192
817400000.0000	53.2638	21.4013
818200000.0000	53.2472	21.3898
819000000.0000	53.2206	21.3509
819800000.0000	53.2651	21.3421
820600000.0000	53.2031	21.3342
821400000.0000	53.2569	21.3262
822200000.0000	53.2297	21.3126
823000000.0000	53.1929	21.3050
823800000.0000	53.2089	21.3010
824600000.0000	53.1688	21.2968
825400000.0000	53.2007	21.2836
826200000.0000	53.1317	21.2780
827000000.0000	53.1724	21.2616
827800000.0000	53.1547	21.2583
828600000.0000	53.1444	21.2514
829400000.0000	53.1139	21.2381
830200000.0000	53.0801	21.2127
831000000.0000	53.0866	20.9850
831800000.0000	53.0999	20.9766
832600000.0000	53.0462	20.7568
833400000.0000	53.0726	20.5038
834200000.0000	53.0510	20.4107
835000000.0000	53.0629	20.2467
835800000.0000	53.0710	20.0301
836600000.0000	53.0212	19.9797
837400000.0000	53.0293	19.9712
838200000.0000	53.0265	19.9690
839000000.0000	52.9767	19.9631
839800000.0000	52.0030	19.9504
840600000.0000	52.9823	19.8921
841400000.0000	52.9904	19.8836
842200000.0000	52.9084	19.8830
843000000.0000	52.9562	19.8787
843800000.0000	52.8925	19.8652
844600000.0000	52.9097	19.8547
845400000.0000	52.9287	19.8338
846200000.0000	52.8795	19.7933
847000000.0000	52.8465	19.7809
847800000.0000	52.9121	19.7758
848600000.0000	52.9329	19.7745
849400000.0000	52.8786	19.7659
850200000.0000	52.8850	19.7540
851000000.0000	52.8702	19.7495
851800000.0000	52.8997	19.6976
852600000.0000	52.8670	19.6807
853400000.0000	52.8648	19.6731
854200000.0000	52.8339	19.6687
855000000.0000	52.8313	19.6465

$\sigma = \omega \epsilon_0 \epsilon'' = 2 \pi f \epsilon_0 \epsilon'' = 0.9405$
 where $f = 835 \times 10^6$
 $\epsilon_0 = 8.854 \times 10^{-12}$
 $\epsilon'' = 20.2467$

835 MHz Head Liquid Validation

835 MHz Head Liquid Validation

Ambient Temp=23 DegC , Liquid Temp=22 DegC ,

3/24/2004

frequency	ϵ'	ϵ''
815000000.0000	40.5310	19.3508
815800000.0000	40.5616	19.3415
816600000.0000	40.5384	19.3411
817400000.0000	40.5010	19.3403
818200000.0000	40.4908	19.3269
819000000.0000	40.4811	19.3271
819800000.0000	40.4675	19.3255
820600000.0000	40.4674	19.3210
821400000.0000	40.4669	19.3177
822200000.0000	40.4667	19.3176
823000000.0000	40.4622	19.3167
823800000.0000	40.4596	19.3079
824600000.0000	40.4571	19.3048
825400000.0000	40.4554	19.2976
826200000.0000	40.4546	19.2917
827000000.0000	40.4464	19.2883
827800000.0000	40.4445	19.2865
828600000.0000	40.4346	19.2844
829400000.0000	40.4337	19.2795
830200000.0000	40.4286	19.2791
831000000.0000	40.4253	19.2666
831800000.0000	40.4251	19.2611
832600000.0000	40.4146	19.2558
833400000.0000	40.4128	19.2515
834200000.0000	40.4096	19.2477
835000000.0000	40.4054	19.2411
835800000.0000	40.4045	19.2393
836600000.0000	40.4034	19.2341
837400000.0000	40.4030	19.2281
838200000.0000	40.3998	19.2188
839000000.0000	40.3986	19.2150
839800000.0000	40.3954	19.2141
840600000.0000	40.3937	19.2133
841400000.0000	40.3930	19.2115
842200000.0000	40.3967	19.2095
843000000.0000	40.3978	19.2080
843800000.0000	40.3953	19.2071
844600000.0000	40.3974	19.2001
845400000.0000	40.3961	19.1988
846200000.0000	40.3971	18.1974
847000000.0000	40.3885	18.1810
847800000.0000	40.3863	18.1792
848600000.0000	40.3882	18.1712
849400000.0000	40.3865	18.1698
850200000.0000	40.3861	18.1637
851000000.0000	40.3831	18.1600
851800000.0000	40.3826	18.1596
852600000.0000	40.3873	18.1502
853400000.0000	40.3850	18.1464
854200000.0000	40.3715	18.1389
855000000.0000	40.3645	18.1308

$$\sigma = \omega \epsilon_0 \epsilon'' = 2 \pi f \epsilon_0 \epsilon'' = 0.8938$$

where $f = 835 \times 10^6$
 $\epsilon_0 = 8.854 \times 10^{-12}$
 $\epsilon'' = 19.2411$

3 - EUT DESCRIPTION

Applicant:	Ingenico Canada Ltd
Product Description:	Wireless Point of Sale Terminal
FCC ID:	O34-E790CDMA
Serial Number:	34600341-00300013
Transmitter Frequency:	824.73~848.19MHz
Maximum Output Power:	0.233 W
Dimension:	8.25'L x 3.5'W x 3'H
RF Exposure environment:	General Population/Uncontrolled
Applicable Standard	FCC CFR 47, Part 22
Application Type:	Certification

¹Specific Absorption Rate (SAR) is a measure of the rate of energy absorption due to exposure to an RF transmitting source (wireless portable device).

²IEEE/ANSI Std. C95.1-1992 limits are used to determine compliance with FCC ET Docket 93-62.

Note: The test data gathered are from production sample, serial number: 34600341-00300013, provided by the manufacturer.

4 - SYSTEM TEST CONFIGURATION

4.1 Justification

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

4.2 EUT Exercise Procedure

The EUT exercising program used during SAR testing was designed to exercise the various system components in a manner similar to a typical use. The EUT was tested by pushing the PTT bottom during the testing.

4.3 Equipment Modifications

No modification(s) were made to the EUT.

5 – CONDUCTED OUTPUT POWER

5.1 Provision Applicable

According to FCC §2.1046 and §22.913 (a), the ERP of mobile transmitters and auxiliary test transmitters must not exceed 7 watts.

5.2 Test Procedure

The RF output of the transmitter was connected to the input of the spectrum analyzer through sufficient attenuation.

5.3 Test equipment

Manufacturer	Description	Model	Serial Number	Cal. Date
HP	Analyzer, Spectrum	8565EC	3946A00131	2003-06-30

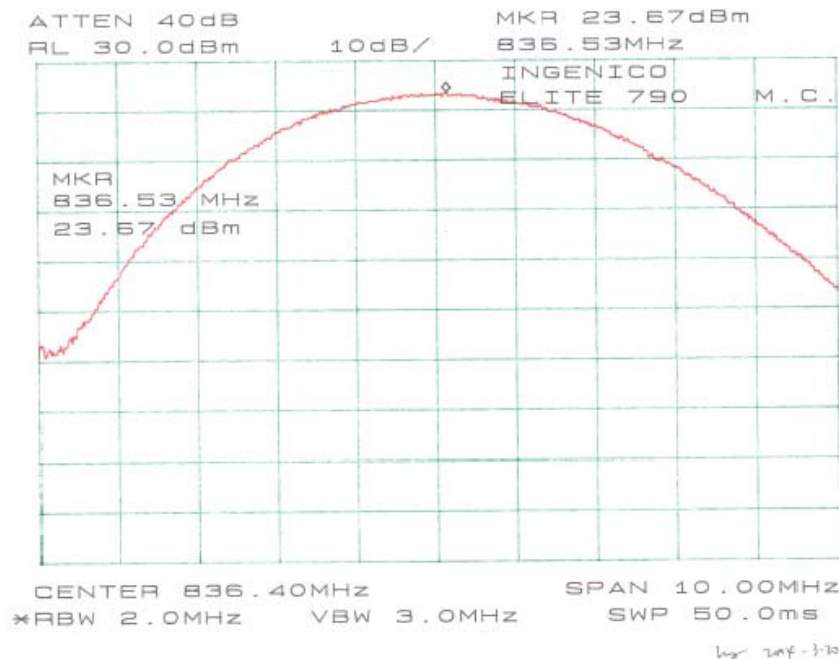
* **Statement of Traceability: BACL Corp.** certifies that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

5.4 Test Results

Channel	Frequency (MHz)	Output Power in dBm	Output Power in W	Limit in W
MIDDLE	836.40	23.67	0.233	7

Note: The output power measured is conducted. During SAR, it is more convenient to measure conducted power rather than EIRP. EMC measurements only required EIRP and results are within 9% between EIRP and conducted.

Please refer to the following plots.



6 - DOSIMETRIC ASSESSMENT SETUP

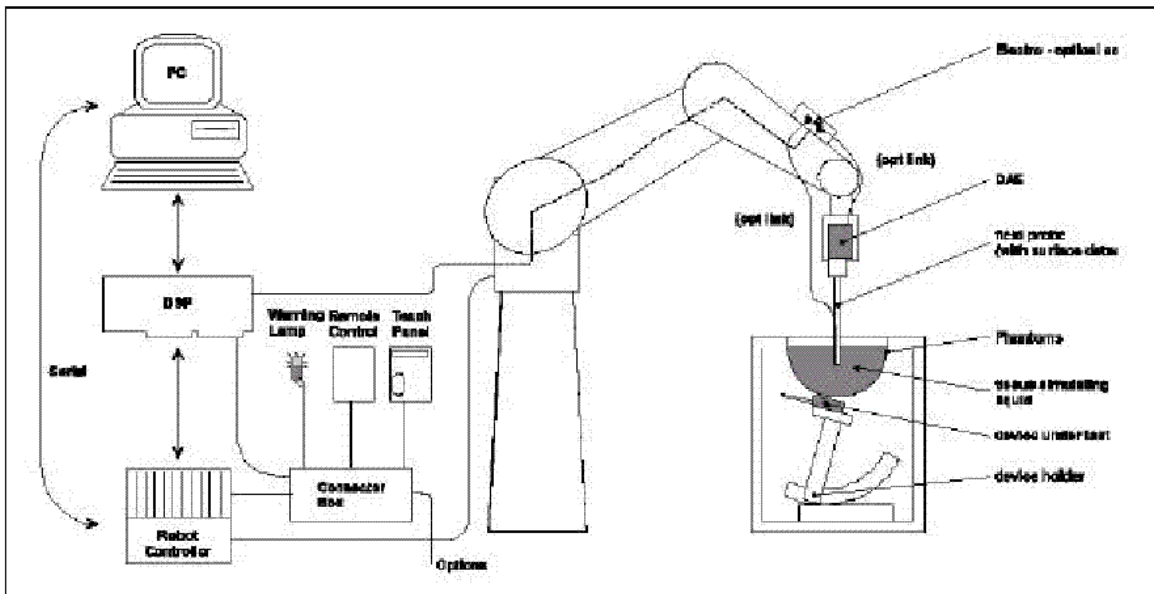
These measurements were performed with the automated near-field scanning system DASY3 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9m) which positions the probes with a positional repeatability of better than ± 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The system is described in detail in [3].

The SAR measurements were conducted with the dosimetric probe ET3DV6 SN: 1604 (manufactured by SPEAG), designed in the classical triangular configuration [3] and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure described in [7] with accuracy of better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure described in [8] and found to be better than ± 0.25 dB.

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

Ingredients (% 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	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	41.5	55.2	42.0	55.9	39.9	53.3	39.8	53.6
Conductivity (s/m)	0.85	0.83	0.9	0.97	1.0	0.98	1.42	1.52	1.88	1.81

6.1 Measurement System Diagram



The DASYS3 system for performing compliance tests consist of the following items:

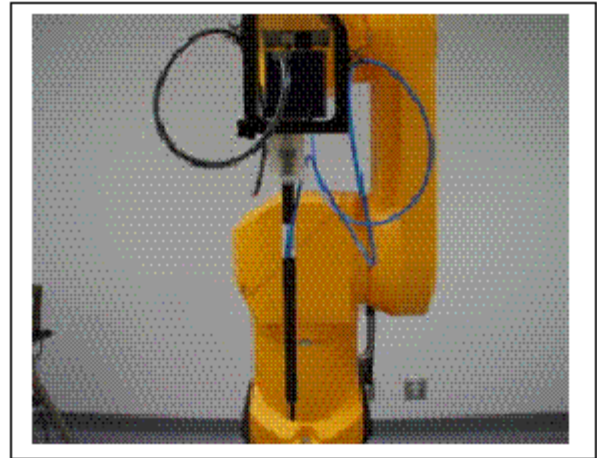
1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software.
2. An arm extension for accommodating the data acquisition electronics (DAE).
3. A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
4. A data acquisition electronic (DAE), which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
5. A unit to operate the optical surface detector, which is connected to the EOC. The Electro-optical coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the PC plug-in card. The functions of the PC plug-in card based on a DSP is to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
6. A computer operating Windows 95 or larger
7. DASYS3 software
8. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
9. The generic twin phantom enabling testing left-hand and right-hand usage.
10. The device holder for handheld EUT.
11. Tissue simulating liquid mixed according to the given recipes (see Application Note).
12. System validation dipoles to validate the proper functioning of the system.

6.2 System Components

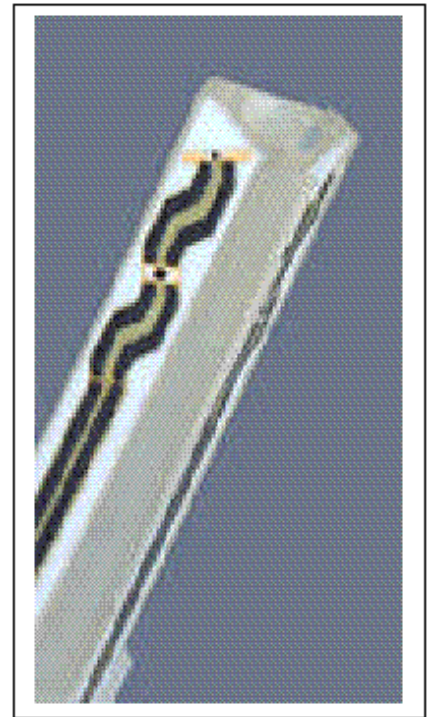
ET3DV6 Probe Specification

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

The SAR measurements were conducted with the dosimetric probe ET3DV6 designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi-fiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY3 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped when reaching the maximum.



Photograph of the probe



Inside view of
ET3DV6 E-field Probe

E-Field Probe Calibration Process

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

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

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

Data Evaluation

The DASY3 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe Parameter:	-Sensitivity	Norm _i , a _{i0} , a _{i1} , a _{i2}
	-Conversion Factor	ConvFi
	-Diode compression point	Dcp _i
Device parameter:	-Frequency	f
	-Crest Factor	cf
Media parameter:	-Conductivity	σ
	-Density	ρ

These parameters must be set correctly in the software. They can either be found in the component documents or be imported into the software from the configuration files issued for the DASY3 components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

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

$$V_i = U_i + (U_i)^2 \text{ cf} / \text{dcp}_i$$

With V_i = compensated signal of channel i ($i=x, y, z$)
 U_i = input signal of channel i ($i=x, y, z$)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

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

$$\text{E-field probes: } E_i = \sqrt{\frac{V_i}{\text{Norm}_i \cdot \text{ConvF}}}$$

$$\text{H-field probes: } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

With V_i = compensated signal of channel i (i = x, y, z)
 Norm_i = sensor sensitivity of channel i (i = x, y, z)
 $\mu\text{V}/(\text{V/m})^2$ for E-field probes
 ConvF = sensitivity enhancement in solution
 a_{ij} = sensor sensitivity factors for H-field probes
 f = carrier frequency [GHz]
 E_i = electric field strength of channel i in V/m
 H_i = diode compression point (DASY parameter)

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

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

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

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

With SAR = local specific absorption rate in mW/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm^3

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

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

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

With P_{pwe} = equivalent power density of a plane wave in mW/cm³
 E_{tot} = total electric field strength in V/m
 H_{tot} = total magnetic field strength in V/m

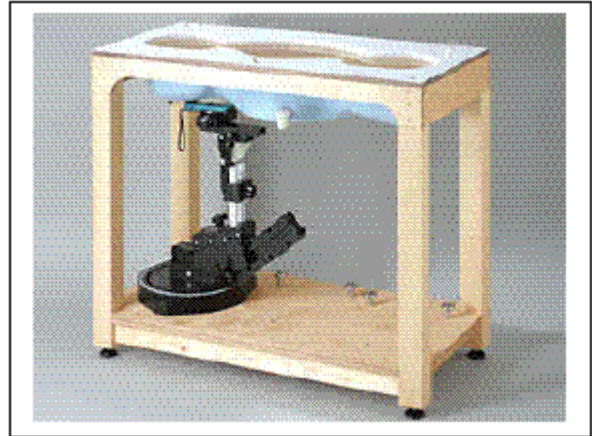
Generic Twin Phantom

The Generic Twin Phantom is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users [9][10]. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allows the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

Shell Thickness 2 ± 0.1 mm

Filling Volume Approx. 20 liters

Dimensions 810 x 1000 x 500 mm (H x L x W)

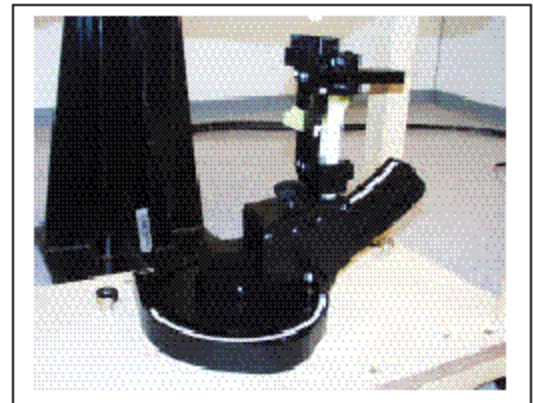


Generic Twin Phantom

Device Holder

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

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



Device Holder

6.3 Measurement Uncertainty

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

Measurement Uncertainty Analysis per IEEE P1528-2002								
Description	Section	Reported Variance (%)	Probability Distribution type	Divisor	Ci (1g)	Ui (1g)	Vi	welc/satt series term
Probe Calibration	E.2.1	4.80	N	1	1	4.80	1.00E+09	5.30842E-07
Axial isotropy	E.2.2	4.70	R	1.732	0.707107	1.92	1.00E+09	1.35563E-08
Hemispherical isotropy	E.2.2	9.60	R	1.732	0.707107	3.92	1.00E+09	2.35957E-07
Boundary effects	E.2.3	8.30	R	1.732	1	4.79	1.00E+09	5.27377E-07
Linearity	E.2.4	4.70	R	1.732	1	2.71	1.00E+09	5.4225E-08
System Detection Limit	E.2.5	1.00	R	1.732	1	0.58	1.00E+09	1.11124E-10
Readout Electronics	E.2.6	0.00	N	1	1	0.00	1.00E+09	0
Response time	E.2.7	0.00	R	1.732	1	0.00	1.00E+09	0
Integration time	E.2.8	0.00	R	1.732	1	0.00	1.00E+09	0
RF Ambient conditions	E.6.1	3.00	R	1.732	1	1.73	1.00E+09	9.00106E-09
Probe positioning mechanical tolerance	E.6.2	0.40	R	1.732	1	0.23	1.00E+09	2.84478E-12
Probe positioning wrt phantom shell	E.6.3	2.90	R	1.732	1	1.67	1.00E+09	7.8596E-09
Extra/inter-polation & integration algorithms for max SAR evaluation	E.5.2	3.90	R	1.732	1	2.25	1.00E+09	2.57079E-08
Test sample positioning	8, E.4.2	6.00	R	1.732	1	3.46	1.00E+09	1.44017E-07
Device holder distance tolerance	E.4.1	5.00	N	1	1	5.00	1.00E+09	0.000000625
Output power and SAR drift measurement	8, E.6.6.2	5.00	R	1.732	1	2.89	1.00E+09	6.94526E-08
Phantom uncertainty, shell thickness tolerance	E.3.1	4.00	R	1.732	1	2.31	1.00E+09	2.84478E-08
Liquid conductivity, deviation from target values	E.3.2	5.00	R	1.732	0.64	1.85	1.00E+09	1.16522E-08
Liquid conductivity, measurement uncertainty	E.3.3	5.00	N	1	0.64	3.20	5	20.97152
Liquid permittivity, deviation from target values	E.3.2	5.00	R	1.732	0.6	1.73	1.00E+09	9.00106E-09
Liquid permittivity, measurement uncertainty	E.3.3	5.00	N	1	0.6	3.00	5	16.2
								689
Probe isotropy sensitivity coefficient	0.5							
Combined Standard Uncertainty						12.65 %		
Expanded Uncertainty, 95% confidence		k=	2.004			25.34 %		

7 - SYSTEM EVALUATION

7.1 Simulated Tissue Liquid Parameter Confirmation

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

7.2 Evaluation Procedures

Maximum Search

The maximum search is automatically performed after each coarse scan measurement. It is based on splines in two or three dimensions. The procedure can find the maximum for most SAR distributions even with relatively large grid spacings. After the coarse scan measurement, the probe is automatically moved to a position at the interpolated maximum. The following scan can directly use this position for reference, e.g., for a finer resolution grid or the cube evaluations.

Extrapolation

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

Boundary Corrections

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

Peak Search for 1g and 10g cube averaged SAR

The 1g and 10g peak evaluations are only available for the predefined cube 4x4x7 and cube 5x5x7 scans. The routine are verified and optimized for the grid dimensions used in these cube measurements. The measured volume of 32x32x35mm contains about 35g of tissue. The first procedure is an extrapolation (incl. Boundary correction) to get the points between the lowest measured plane and the surface. The next step uses 3D interpolation get all points within the measured volume in a 1mm grid (35000 points). In the last step, a 1g cube is place numerically into the volume and its averaged SAR is calculated. This cube is the moved around until the highest averaged SAR is found. This last procedure is repeated for a 10g cube. If the highest SAR is found at the edge of the measured volume, the system will issue a warning, higher SAR values might be found outside of the measured volume. In that case the cube measurement can be repeated, using the new interpolated maximum as the center.

7.3 System Accuracy Verification

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

IEEE P1528 recommended reference value

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

Validation Dipole SAR Reference Test Result for Body

Validation Measurement	SAR @ 0.025W Input averaged over 1g	SAR @ 1W Input averaged over 1g	SAR @ 0.025W Input averaged over 10g	SAR @ 1W Input averaged over 10g
Test 1	0.222	8.88	0.112	4.48
Test 2	0.221	8.84	0.111	4.44
Test 3	0.222	8.88	0.112	4.48
Test 4	0.220	8.80	0.111	4.44
Test 5	0.223	8.92	0.113	4.52
Test 6	0.222	8.88	0.115	4.60
Test 7	0.221	8.84	0.114	4.56
Test 8	0.222	8.88	0.114	4.56
Test 9	0.223	8.92	0.113	4.52
Test 10	0.222	8.88	0.112	4.48
Average	0.2218	8.872	0.1127	4.51

System Validation Result

Ambient Temperature ($^{\circ}\text{C}$): 23

2004-03-24

Simulant	Freq MHz]	Parameters	Liquid Temp [$^{\circ}\text{C}$]	Target Value	Measured Value	Deviation	Limits [%]
Body	835	ϵ_r	22	55.2	53.1	-3.80	± 5
		σ	22	0.97	0.94	-3.09	± 5
		1g SAR	22	8.872	8.940	0.766	± 10
Head	835	ϵ_r	22	41.5	40.4	-2.65	± 5
		σ	22	0.90	0.89	-1.11	± 5
		1g SAR	22	9.5	9.110	-4.11	± 10

ϵ_r = relative permittivity, σ = conductivity and $\rho=1000\text{kg/m}^3$

Forward Power = 20.7 dBm = 117.45 mW

System Validation 835 MHz Body liquid (Ambient Temp = 23 Deg C, Liquid Temp = 22 Deg C, Forward Power = 20.7 dBm, 03/24/2004)

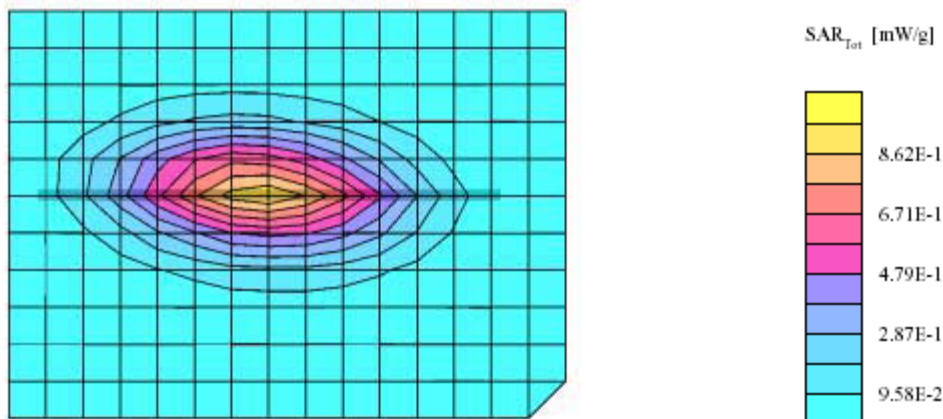
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz

Probe: ES3DV2 - SN3019; ConvF(6.10,6.10,6.10); Crest factor: 1.0; 835 (Body) MHz: $\sigma = 0.94$ mho/m $\epsilon_r = 53.1$ $\rho = 1.00$ g/cm³

Cube 5x5x7; SAR (1g): 1.05 mW/g, SAR (10g): 0.580 mW/g, (Worst-case extrapolation)

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

Powerdrift: 0.00 dB



System Validation 835 MHz Head liquid (Ambient Temp = 23 Deg C, Liquid Temp = 22 Deg C, 03/24/2004)

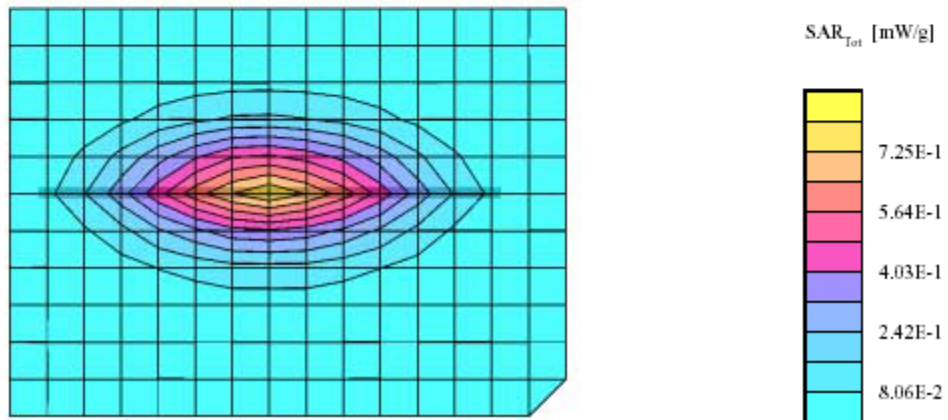
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz

Probe: ES3DV2 - SN3019; ConvF(6.50,6.50,6.50); Crest factor: 1.0; 835 (Head) MHz: $\sigma = 0.89 \text{ mho/m}$, $\epsilon_r = 40.4$, $\rho = 1.00 \text{ g/cm}^3$

Cube 5x5x7; SAR (1g): 1.07 mW/g, SAR (10g): 0.618 mW/g, (Worst-case extrapolation)

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

Powerdrift: -0.00 dB



7.4 SAR Evaluation Procedure

- a. The evaluation was performed in the applicable area of the phantom depending on the type of device being tested. For device held to the ear during normal operation, both the left and right ear positions were evaluated in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01) using the SAM phantom. For body-worn and face-held devices a planar phantom was used. The EUT in the test setup for body-worn and face-held devices was placed in three different positions (relative to the phantom): with belt clip, without belt clip and 2.5cm facing left head side and 2.5cm facing right head side.
- b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.
- c. A 5x5x7 matrix was performed around the greatest special SAR distribution found during the area scan of the applicable exposed region. SAR values were then calculated using a 3-D spline interpolation algorithm and averaged over spatial volumes of 1 and 10 grams.
- d. The depth of the simulating tissue in the planar used for the SAR evaluation and system validation was no less than 15.0cm.
- e. For this particular evaluation, a stack of low-density, low-loss dielectric foamed polystyrene was used in place of the device holder.
- f. Re-measurement of the SAR value at the same location as in a. If the value changed by more than 5%, the evaluation was repeated.

7.5 Exposure Limits

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

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

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

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

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

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

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

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

8 - TEST RESULTS

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

According to the data in section 8.1, the EUT complied with the FCC 2.1093 RF Exposure standards, with worst case of 0.670 mW/g.

8.1 SAR Test Data

Ambient Temperature (°C): 23.0

Relative Humidity (%): 49.3

Position	Frequency (MHz)	Output Power (dBm)	Test Type	Antenna position	Liquid	Phantom	Measured (mW/g)	Limit (mW/g)	Plot #
Back Side Touching	835	23.67	Body Worn	Antenna pointing down and perpendicular with phantom bottom with headset	Body	Body	0.195	1.6	1
Botom Side Touching	835	23.67		Antenna parallel with phantom bottom with headset			0.670		2
Left Side Touching	835	23.67		Antenna pointing into and perpendicular with phantom bottom gaped 1.5cm with headset			0.0301		3
Right Side Touching	835	23.67		Antenna pointing parallel out and perpendicular with phantom bottom gaped 1.5com with headset			0.0954		4

8.2 Plots of Test Result

The plots of test result were attached as reference.

Ingenico, Elite 790 CDMA (Back side in touch to the flat phantom, Ambient Temp = 23 C,
Liquid Temp = 22 C, Mid Channel, 3/24/2004)

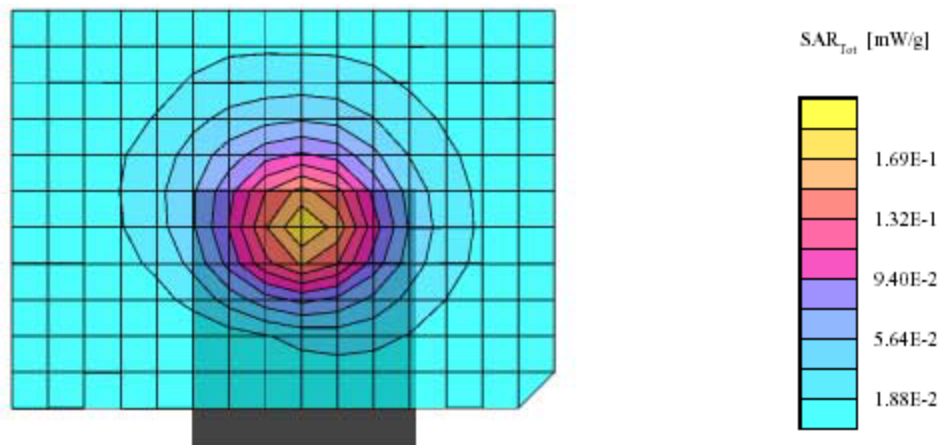
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz

Probe: ET3DV2 - SN3019; ConvF(6.10,6.10,6.10); Crest factor: 1.0; Body Liquid 1900 MHz: $\sigma = 0.94 \text{ mho/m}$, $\epsilon_r = 53.1$ $\rho = 1.00 \text{ g/cm}^3$

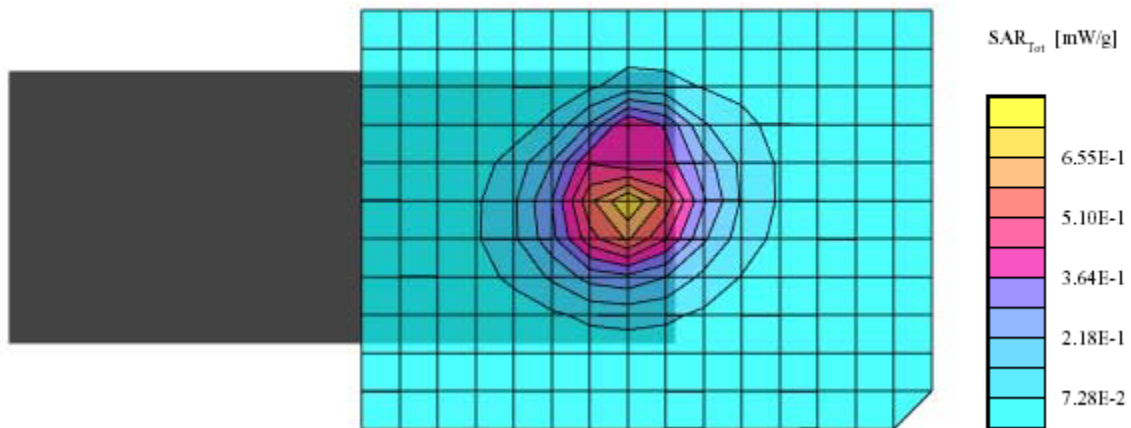
Cube 5x5x7; SAR (1g): 0.195 mW/g, SAR (10g): 0.127 mW/g, (Worst-case extrapolation)

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

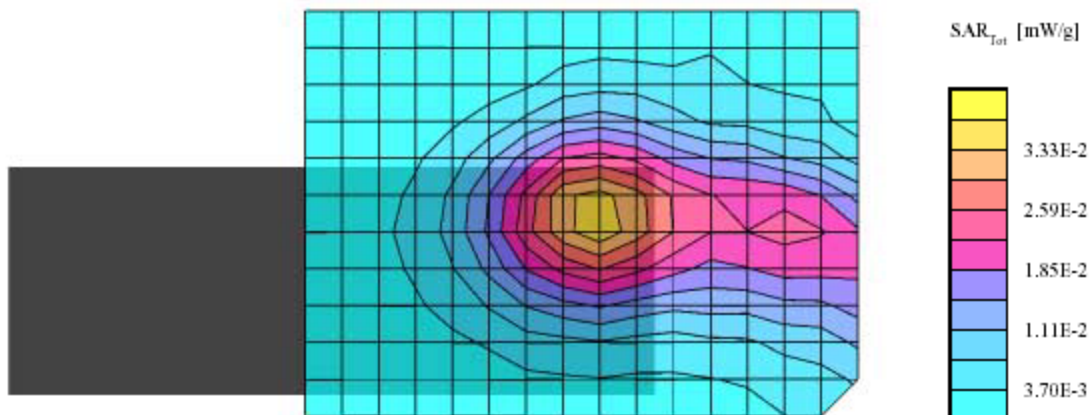
Powerdrift: -0.03 dB



Ingenico, Elite 790 CDMA (Bottom side in touch to the flat phantom, Ambient Temp = 23 C,
 Liquid Temp = 22 C, Mid Channel, 3/24/2004)
 SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz
 Probe: ES3DV2 - SN3019; ConvF(6.10,6.10,6.10); Crest factor: 1.0; Body Liquid 835MHz: $\sigma = 0.94$ mho/m $\epsilon_r = 53.1$ $\rho = 1.00$ g/cm³
 Cube 5x5x7: SAR (1g): 0.670 mW/g, SAR (10g): 0.394 mW/g, (Worst-case extrapolation)
 Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0
 Powerdrift: 0.03 dB



Ingenico, Elite 790 CDMA (Left side in touch to the flat phantom, Ambient Temp = 23 C,
 Liquid Temp = 22 C, Mid Channel, 3/24/2004)
 SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz
 Probe: ET3DV2 - SN3019; ConvF(6,10,6,10,6,10); Crest factor: 1.0; Body Liquid 835 MHz: $\sigma = 0.94 \text{ mho/m}\epsilon_r = 53.1 \rho = 1.00 \text{ g/cm}^3$
 Cube 5x5x7: SAR (1g): 0.0301 mW/g, SAR (10g): 0.0199 mW/g, (Worst-case extrapolation)
 Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0
 Powerdrift: -0.03 dB



Ingenico, Elite 790 CDMA (Right side in touch to the flat phantom, Ambient Temp = 23 C,
Liquid Temp = 22 C, Mid Channel, 3/24/2004)
SAM Phantom; Flat Section; Position: (90°,90°); Frequency: 835 MHz
Probe: ES3DV2 - SN3019; ConvF(6.10,6.10,6.10); Crest factor: 1.0; 835 MHz: $\sigma = 0.94$ mho/m $\epsilon_r = 53.1$ $\rho = 1.00$ g/cm³
Cube 5x5x7: SAR (1g): 0.0954 mW/g, SAR (10g): 0.0506 mW/g. (Worst-case extrapolation)
Coarse: Dx = 12.0, Dy = 12.0, Dz = 10.0
Powerdrift: 0.01 dB

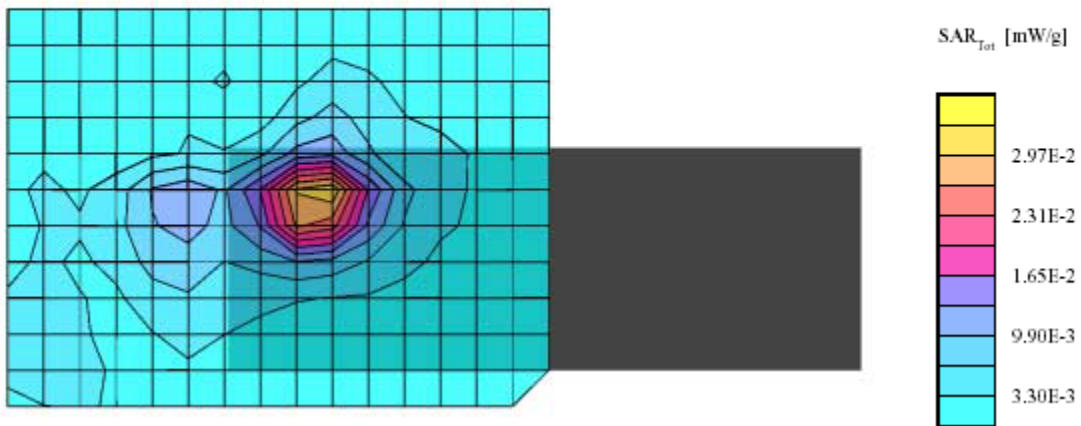


EXHIBIT A - SAR SETUP PHOTOGRAPHS

Back Side Touching Phantom



Bottom Side Touching Phantom



Left Side Touching Phantom



Right Side Touching Phantom



EXHIBIT B - EUT PHOTOGRAPHS

Chassis - Front View



Chassis - Rear View



Chassis – Rear View without Battery



EUT – Base Top View



EUT – Base Bottom View



EUT – Base Port View



Battery – Top View



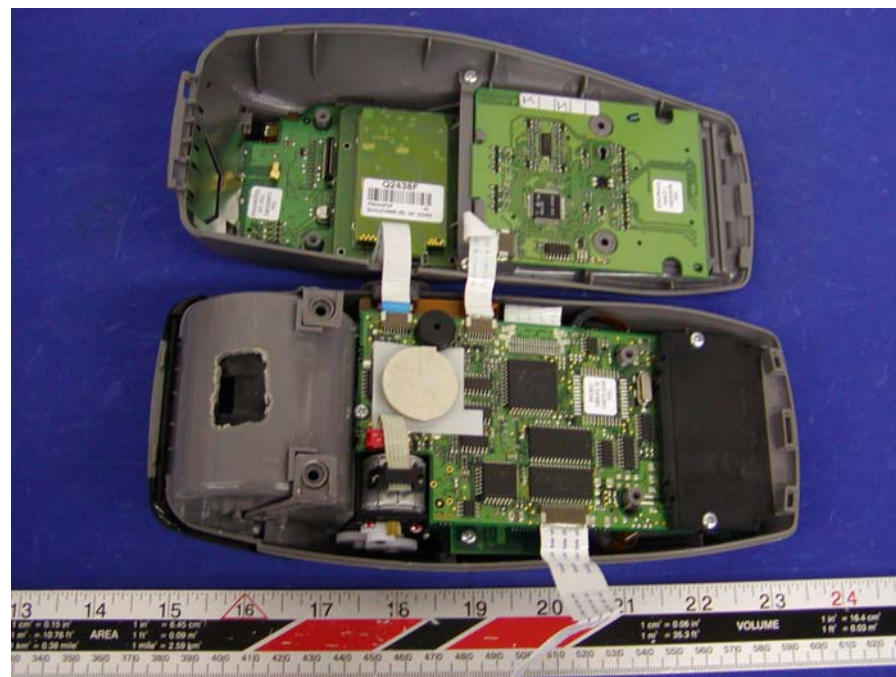
Battery – Bottom View



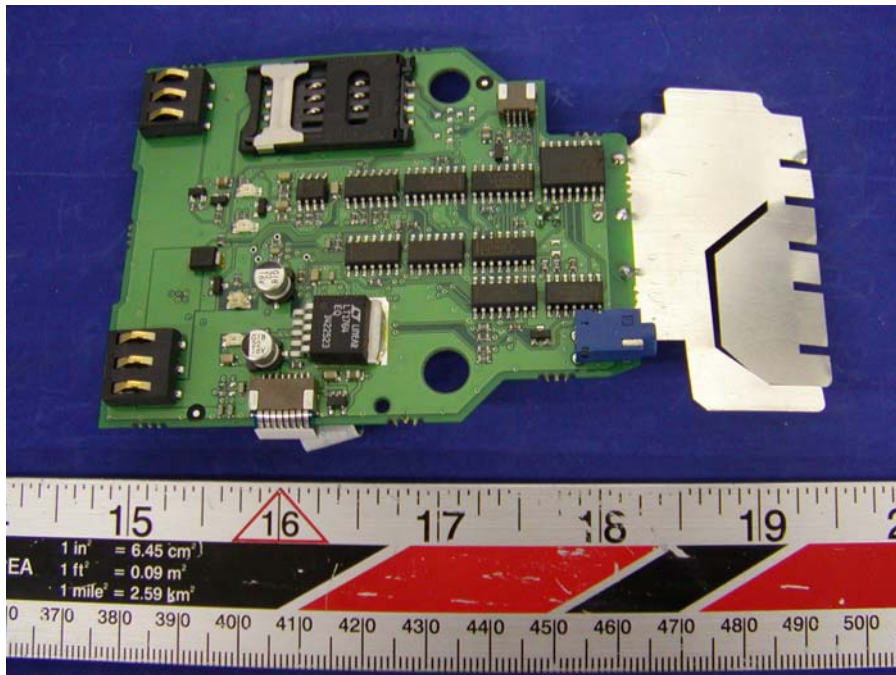
AC Power Adapter



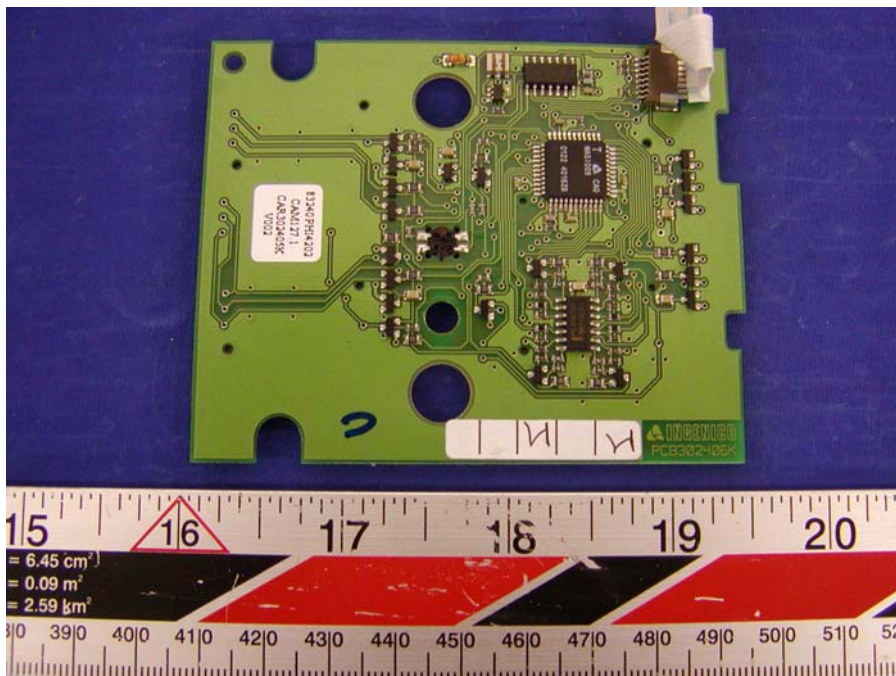
Chassis – Cover off View



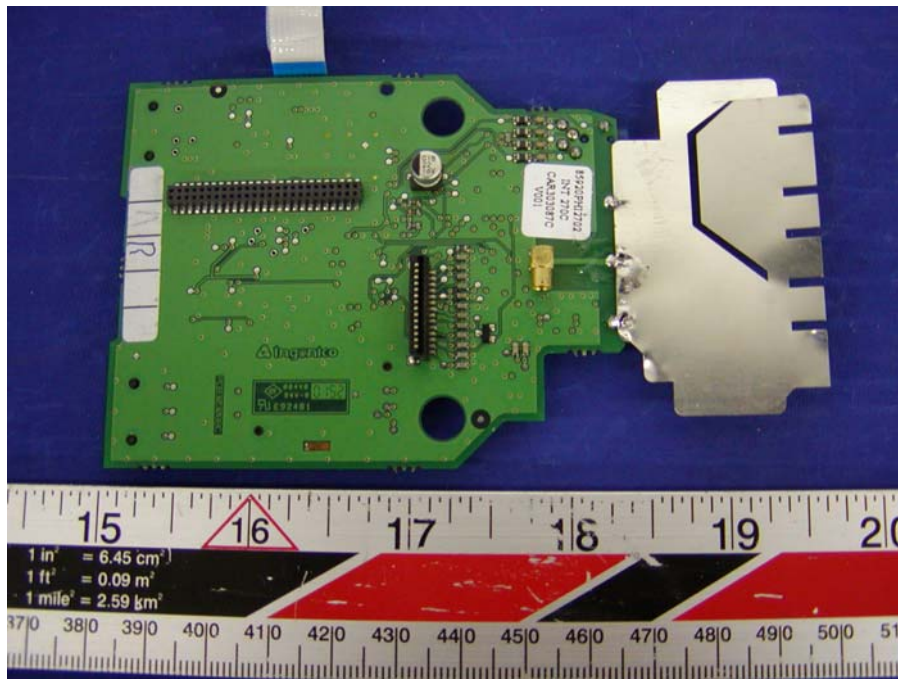
EUT – Component View 1



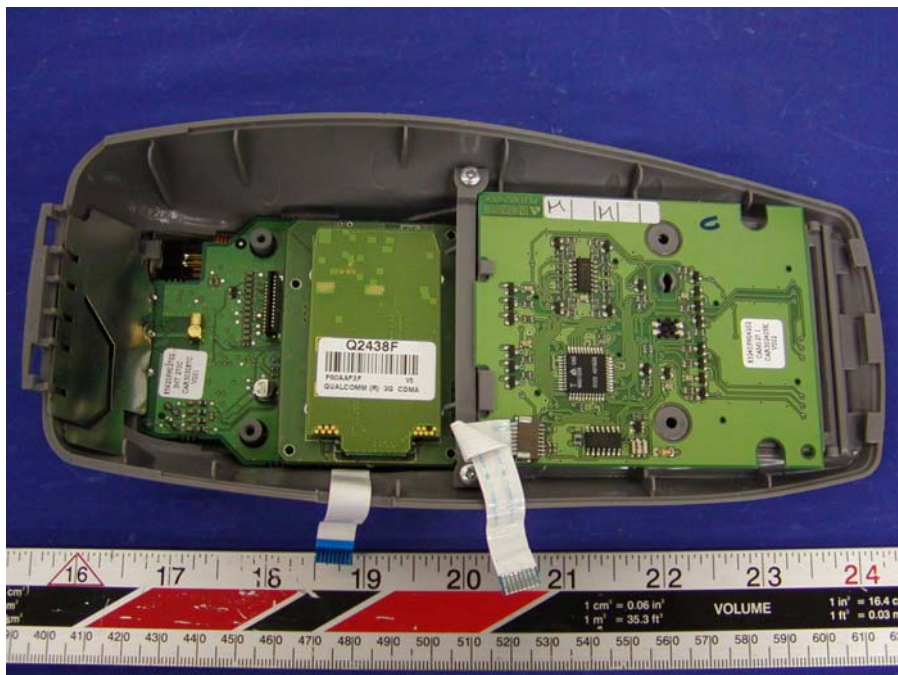
EUT – Component View 2



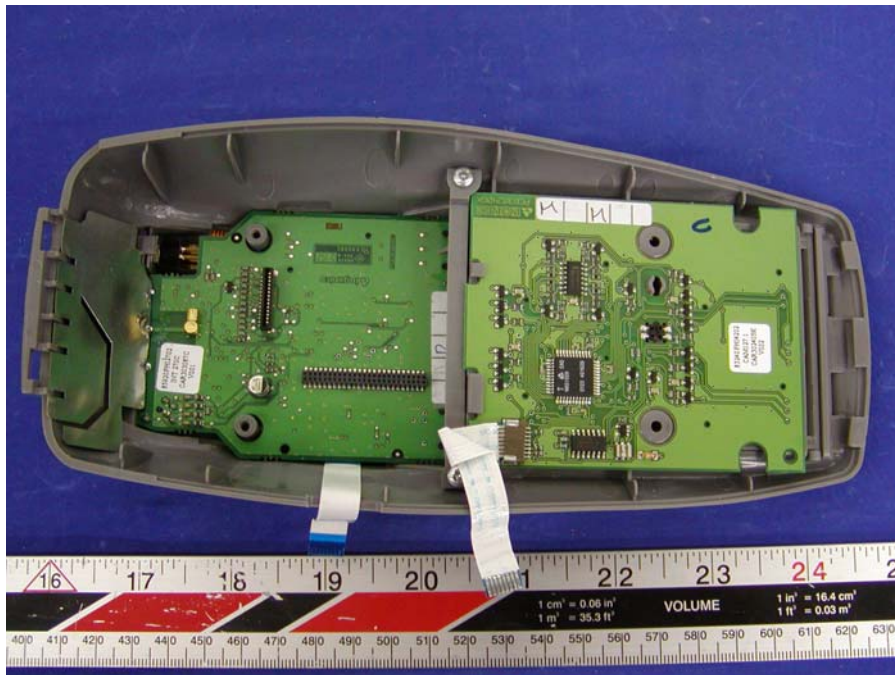
EUT – Solder View



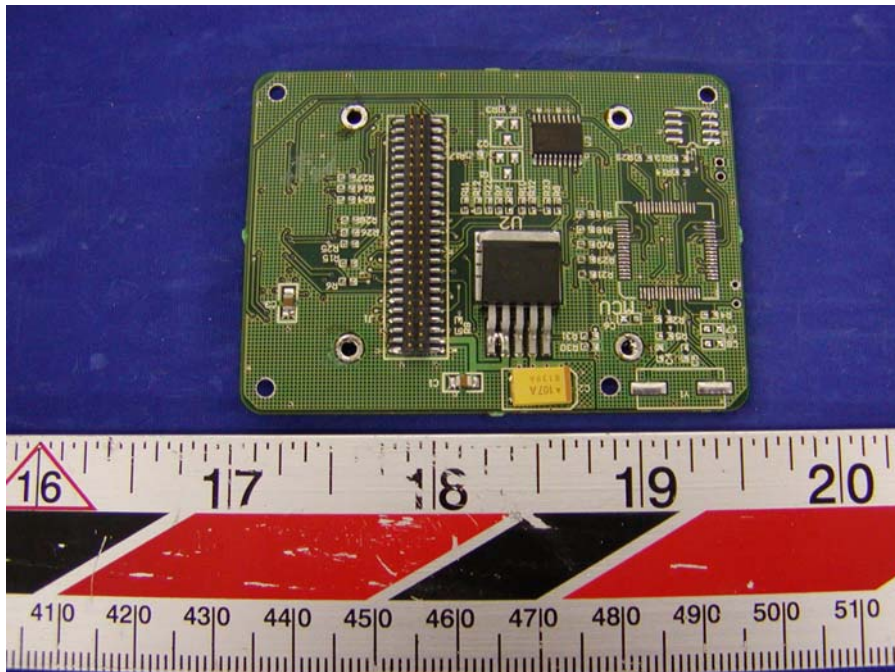
EUT – Solder View with Transceiver



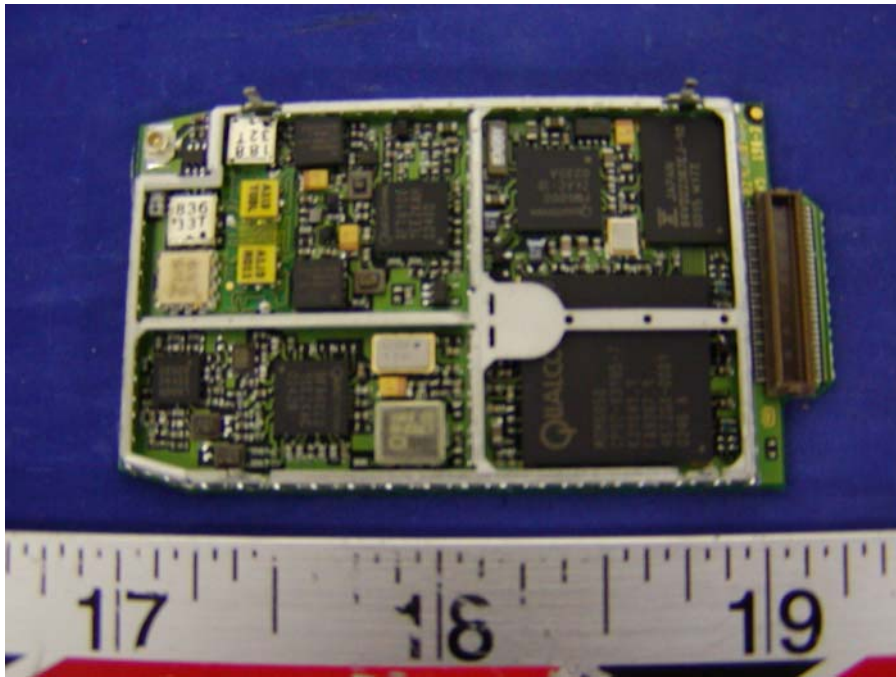
EUT – Solder View without Transceiver



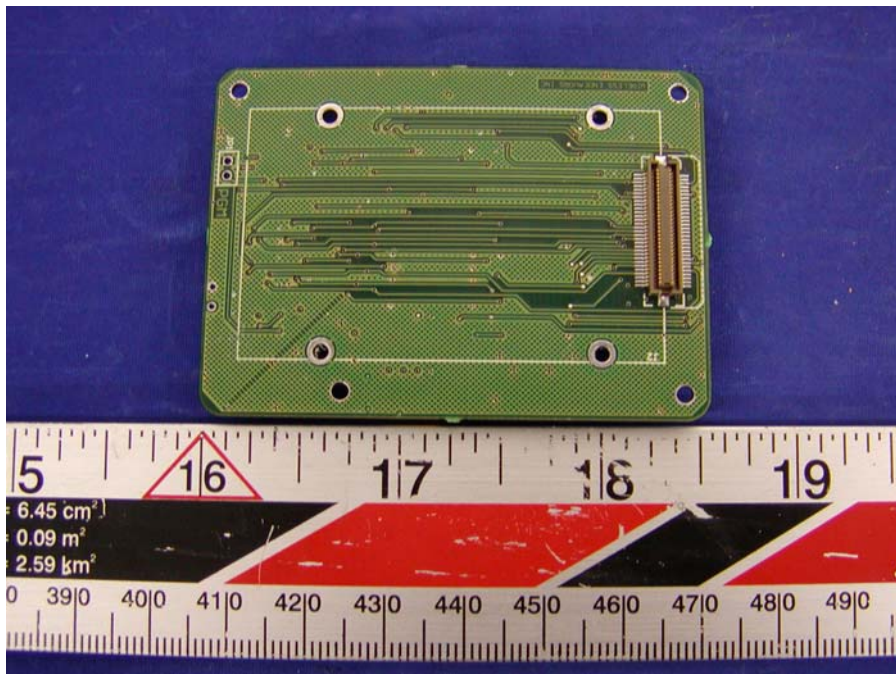
Transceiver – Layer 1 Component View



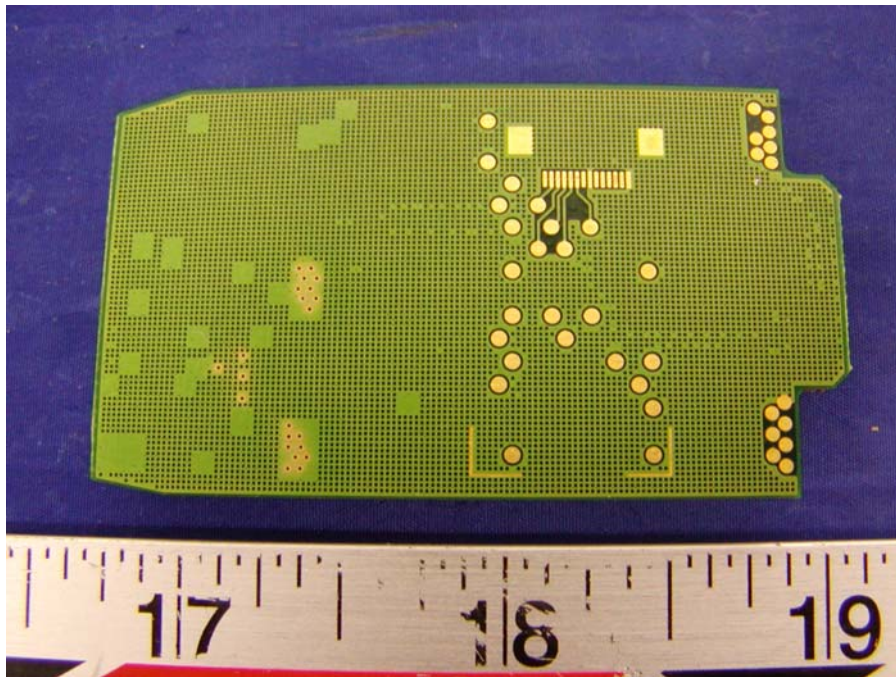
Transceiver – Layer 2 Component View



Transceiver – Layer 1 Solder View



Transceiver – Layer 2 Solder View



Transceiver – Solder View

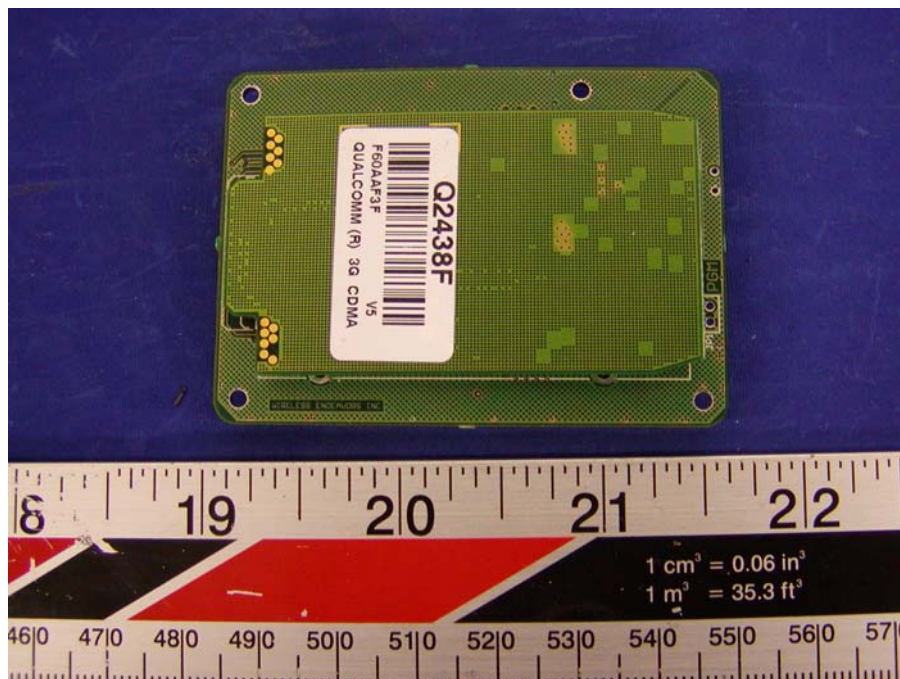


EXHIBIT C – Z-Axis

Ingenico, Elite 790 CDMA (Bottom side in touch to the flat phantom, Ambient Temp = 23 C,
Liquid Temp = 22 C, Mid Channel, 3/24/2004)

SAM Phantom; Section; Position ; Frequency: 835 MHz

Probe: ES3DV2 - SN3019; ConvF(6.10,6.10,6.10); Crest factor: 1.0; Body Liquid 835MHz: $\sigma = 0.94 \text{ mho/m}$, $\epsilon_r = 53.1$ $\rho = 1.00 \text{ g/cm}^3$

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

