



Certification Report on

Specific Absorption Rate (SAR) Experimental Analysis

Handspring

VisorPhone

Test Date: March 2001



HANB-Visorphone-3657

51 Spectrum Way Nepean ON K2R 1E6
Tel: (613) 820-2730 Fax: (613) 820-4161
email: info@aprel.com

CLASS TWO PERMISSIVE CHANGE SAR REPORT FOR HEAD

Subject: Specific Absorption Rate (SAR) FCC Report

Product: VisorPhone

Model: Not Applicable

Client: Handspring

Address: 189 Bernardo Avenue
Mountain View, Ca
94043-5203

Project #: HANB-VisorPhone-3657

Prepared by APREL Laboratories
51 Spectrum Way
Nepean, Ontario
K2R 1E6

Approved by Stuart Nicol
Date: 15 Feb 2001
Stuart Nicol
Director Product Development, Dosimetric R&D

Submitted by Jay Sarkar
Date: March 16, 2001
Jay Sarkar
Technical Director of Standards & Certification

Released by Dr. Jacek J. Wojcik, P. Eng.
Date: March 16, 2001
Dr. Jacek J. Wojcik, P. Eng.

Page 1 of 17

51 Spectrum Way
Nepean, Ontario, K2R 1E6

Project #: HANB-Visorphone-3657

Tel. (613) 820-2730
Fax (613) 820-4161
e-mail: info@aprel.com

© APREL 2000

This report shall not be reproduced, except in full,



At the express written approval of APREL Laboratories.



FCC ID: OAFHVP-1H
Applicant: Handspring
Equipment: VisorPhone
Model: N/A
Standard: FCC 96-326, Guidelines for Evaluating the Environmental Effects of Radio-Frequency Radiation

ENGINEERING SUMMARY

This report contains the results of the engineering evaluation performed on a Visorphone mounted onto the Visor Edge PDA. The measurements were carried out in accordance with FCC 96-326. The Device Under Investigation (DUI) was evaluated for its maximum power level 30 dBm (nominally). The client will supply a letter of confirmation as to the true conducted power level for the product tested. The duty cycle for the radio is set by the PCS standard at a value of one in eight and is restricted by the operational characteristics of the DUI.

The DUI was tested at low, middle and high channels for the PCS frequency range. The maximum 1g SAR (0.711W/kg) was found to coincide with the peak performance RF output power of channel 512 Low (1850,2 MHz) for the keyboard side of the device. (The hot spot is located on the upper right hand side of the DUI below the shoulder of the antenna). Test data and graphs are presented in this report.

Based on the test results and on how the device will be marketed and used, it is certified that the product meets the requirements as set forth in the above specifications as part of a part two permissive change, for RF exposure environment.

(The results presented in this report relate only to the sample tested.)



Table of Contents

| | |
|---|----|
| 1. Introduction | 4 |
| 2. Applicable Documents | 4 |
| 3. Device Under Investigation | 4 |
| 4. Test Equipment | 5 |
| 5. Test Methodology | 5 |
| 6. Test Results | 6 |
| 6.1 Transmitter Characteristics | 6 |
| 6.2 SAR Measurements | 7 |
| 7. User's Head Exposure | 8 |
| 8. Conclusion | 10 |
| APPENDIX A. Measurement Setup, Tissue Properties and SAR Graphs | 11 |
| APPENDIX B. Uncertainty Budget | 15 |
| APPENDIX C. Validation Scan on a Flat Phantom | 16 |
| APPENDIX D. Probe Calibration | 17 |

TABLES AND FIGURES

| | |
|--|----|
| Figure 1. Setup | 11 |
| Figure 2. DUI at 3mm Spacer | 11 |
| Figure 3. Top View of DUI With Grid | 12 |
| Figure 4. Contour Plot of Area Scan 2.5 mm Above Phantom Surface | 13 |
| Figure 5. Surface Plot of the Area Scan 2.5 mm Above Phantom Surface | 14 |
| Figure 6. Contour Plot of the Reference Area Scan 2.5 mm Above Phantom | 16 |
| Figure 7. Surface Plot of the Reference Area Scan 2.5 mm Above Phantom | 16 |
| Table 1. Sample Conducted RF Power | 6 |
| Table 2. SAR Measurements | 8 |
| Table 3. Dielectric Properties of the Simulated Head | 12 |
| Table 4. Uncertainty Budget | 14 |



1. INTRODUCTION

Tests were conducted to determine the Specific Absorption Rate (SAR) for a sample VisorPhone used on the Visor Edge PDA to support the class two permissive change. These tests were conducted at APREL Laboratories' facility located at 51 Spectrum Way, Nepean, Ontario, Canada. A view of the SAR measurement setup can be seen in Appendix A Figure 1. This report describes the results obtained.

2. APPLICABLE DOCUMENTS

The following documents are applicable to the work performed:

- 1) FCC 96-326, Guidelines for Evaluating the Environmental Effects of Radio-Frequency Radiation
- 2) ANSI/IEEE C95.1-1999, IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.
- 3) ANSI/IEEE C95.3-1992, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave.
- 4) OET Bulletin 65 (Edition 97-01) Supplement C (Edition 97-01), “Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields”.

3. DEVICE UNDER INVESTIGATION

- VisorPhone, s/n CAAEF04842509 , received by APREL on Feb 7, 2001 .

The VisorPhone will be called DUI (Device Under Investigation) in the following test report.

The manufacturer's original submission documentation contains all the necessary drawings and applicable design details.



4. TEST EQUIPMENT

- APREL Triangular Dosimetric Probe Model E-009, s/n 115, Asset # 301420
- CRS Robotics A255 articulated robot arm, s/n RA2750, Asset # 301335
- CRS Robotics C500 robotic system controller, s/n RC584, Asset # 301334
- Rohde & Schwarz CMD 55 Radio Communications Tester Asset # WT996010
- British Telecom SIMM card
- Universal Head and Arm Simulator (phantom shell thickness 3mm)
- Tissue Recipe and Calibration Requirements, APREL procedure SSI/DRB-TP-D01-033

5. TEST METHODOLOGY

1. The test methodology utilized in the certification of the DUI complies with the requirements of FCC 96-326 and ANSI/IEEE C95.3-1992.
2. The E-field is measured with a small isotropic probe (output voltage proportional to E^2).
3. The probe is moved precisely from one point to the next using the robot (10 mm increments for wide area scanning, 5 mm increments for zoom scanning, and 2.5 mm increments for the final depth profile measurement).
4. The probe travels in the homogeneous liquid simulating human tissue. Appendix A contains information about the properties of the simulated tissue used for these measurements.
5. The liquid is contained in a manikin simulating the critical coupling area of the human head with an overall shell thickness of 3 mm.



6. The DUI is positioned with the surface under investigation against the phantom touching the spacer at the receiver end of the DUI giving a total maximum distance (which includes the phantom thickness and spacer) of 6mm.
7. All tests were performed with the highest power available from the sample DUI under transmit conditions.

More detailed descriptions of the test method is given in Section 6 when appropriate.

6. TEST RESULTS

6.1. TRANSMITTER CHARACTERISTICS

The battery-powered DUI will consume energy from its batteries, which may affect the DUI's transmission characteristics. In order to gage this effect the output of the transmitter is sampled before and after each SAR run. In the case of this DUI, the Tx power was sampled throughout the test process. The following table shows the RF power sampled before and after each of the five sets of data used for the worst case SAR in this report.

Note

The power measurement is not conducted and only relative to a true pin on pin conducted measurement. The R&S communications tester provides the technician with the functionality of viewing the expected power and the actual received power form the DUI. This allows the technician to monitor the possible drift in power during the test process, and as a result assess the delta if any.

| Scan | | Power Readings (dBm) | | D (dB) |
|-------|-------------|----------------------|-------|-----------|
| Type | Height (mm) | Before | After | |
| Area | 2.5 | 15.8 | 15.7 | 0.1 |
| Zoom | 2.5 | 15.7 | 15.6 | 0.1 |
| Zoom | 7.5 | 15.9 | 15.7 | 0.2 |
| Zoom | 12.5 | 16.0 | 15.8 | 0.2 |
| Depth | 2.5 – 22.5 | 15.8 | 15.7 | 0.1 |

Table 1. Sampled RF Power



6.2. SAR MEASUREMENTS

- 1) RF exposure is expressed as a Specific Absorption Rate (SAR). SAR is calculated from the E-field, measured in a grid of test points as shown in Appendix A Figure 1. SAR is expressed as RF power per kilogram of mass, averaged in 10 grams of tissue for the extremities and 1 gram of tissue elsewhere.
- 2) The DUI was put into test mode for the SAR measurements by enabling a call via the R&S communications tester. A SIMM card was located in the DUI to enable the interaction between the R&S communications tester and the DUI. The R&S communications tester then sent out a command for the DUI to transmit at full power at the specified frequency.
- 3) Figure 4 in Appendix A shows a contour plot of the SAR measurements for the DUI (channel 512, 1850.2 MHz). It also shows an overlay of the DUI's outlines, superimposed onto the contour plot.

A different presentation of the same data is shown in Appendix A Figure 5. This is a surface plot, where the measured SAR values provide the vertical dimension, which is useful as a visualization aid.

- 4) Wide area scans were performed for the low, middle and high channels of the DUI. The DUI was operating at maximum output power (30 dBm) with the duty cycle set at one in eight as per the PCS specification. The DUI was placed next to the phantom in the generic touch position. The maximum distance was 6mm at the spacer (including the phantom shell thickness) decreasing to 3mm at the microphone.



| TYPE OF EXPOSURE | DUI side | Device distance to phantom (mm) | Channel | | | Peak Local SAR (W/kg) |
|------------------|-------------|---------------------------------|---------|-----|------------|-----------------------|
| | | | L/M/H | # | Freq (MHz) | |
| Head | Keyboard up | 3 | Low | 512 | 1850.2 | 0.65 |
| | Keyboard up | 3 | Middle | 661 | 1880 | 0.47 |
| | Keyboard up | 3 | High | 810 | 1909.8 | 0.31 |

Table 2. SAR Measurements

7. USER'S HEAD EXPOSURE

- 1) Due to the above data all the subsequent testing for user's head exposure was performed on channel 512 (1850.2 MHz), with the keyboard of the DUI facing up at a maximum distance of 6mm at the spacer and minimum distance of 3 mm at the lower end of the DUI. This relates to the position and frequency found to provide the maximum measured SAR value.
- 2) Channel 512 (1850.2 MHz) was also explored on a refined 5 mm grid in three dimensions. The SAR value averaged over 1 gram was determined from these measurements by averaging the 27 points (3x3x3) comprising a 1 cm cube. The maximum SAR value measured averaged over 1 gram was determined from these measurements to be 0.322 W/kg.
- 3) To extrapolate the maximum SAR value averaged over 1 gram to the inner surface of the phantom a series of measurements were made at five (x,y) co-ordinates within the refined grid as a function of depth, with 2.5 mm spacing. The average exponential coefficient was determined to be $(-0.165 \pm 0.013) / \text{mm}$.



4) The distance from the probe tip to the inner surface of the phantom for the lowest point is 2.5 mm. The distance from the probe tip to the tip of the measuring dipole within the APREL Triangular Dosimetric Probe Model E-009 is 2.3 mm. The total extrapolation distance is 4.8 mm, the sum of these two.

Applying the exponential coefficient over the 4.8 mm to the maximum SAR value averaged over 1 gram that was determined previously, we obtain the **maximum SAR value at the surface averaged over 1 gram, 0.711 W/kg**.



CONCLUSIONS

The maximum Specific Absorption Rate (SAR) averaged over 1 gram, determined at 1850.2 MHz (channel 512) of the Visophone, is 0.711 W/kg. The overall margin of uncertainty for this measurement is $\pm 25.3\%$ (Appendix B). The SAR limit given in the FCC 96-326 Safety Guideline is 1.6 W/kg for head exposure for the general population.

Tested by



Date

15 MAR, 2001



APPENDIX A. Measurement Setup, Tissue Properties and SAR Graphs

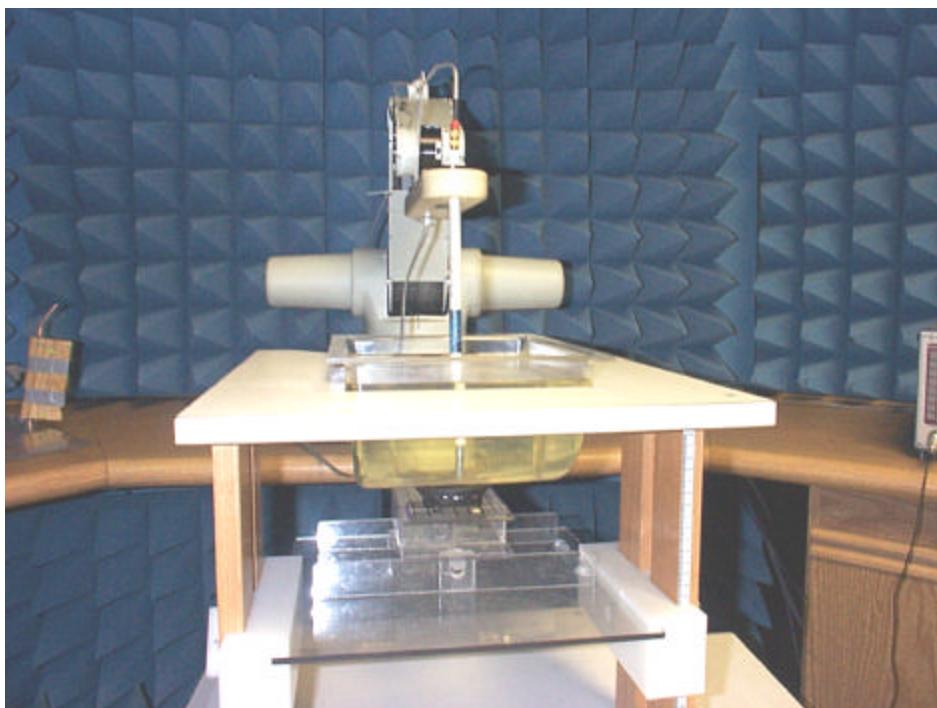


Figure 1. Setup

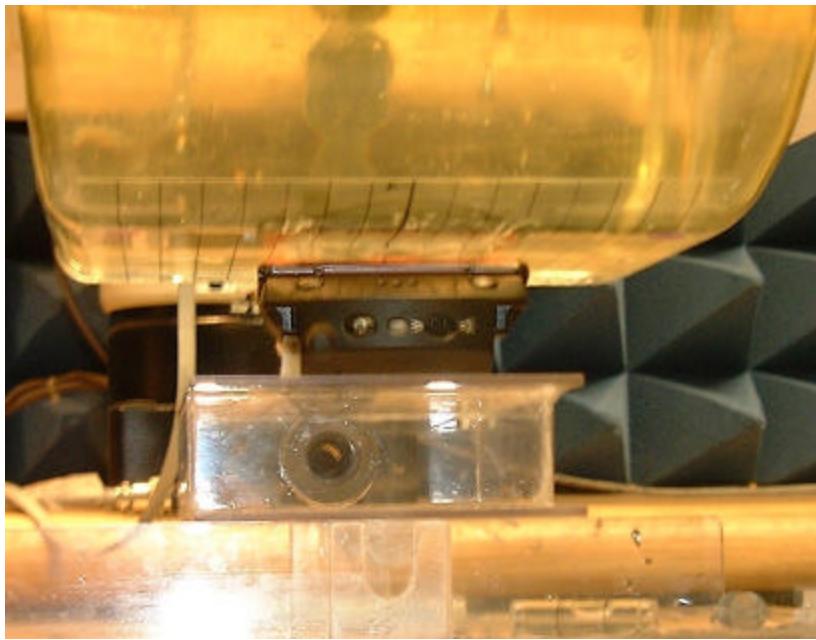


Figure 2. DUI at 3mm Spacer



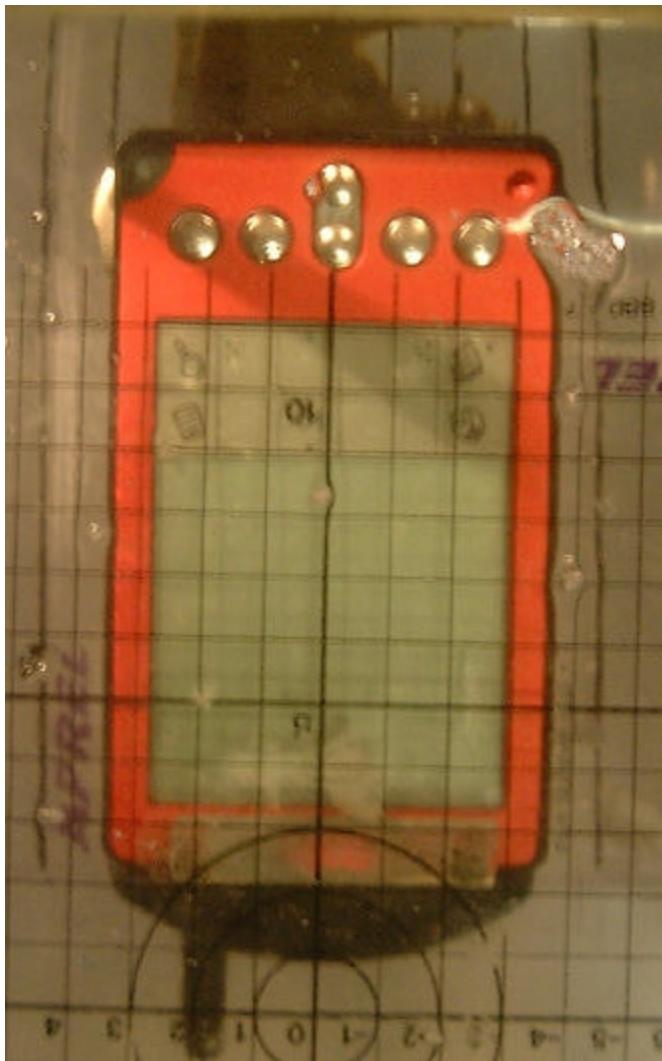


Figure 3. Top View of DUI With Grid

Simulated Tissue Material and Calibration Technique

The mixture used was based on that presented SSI/DRB-TP-D01-033, "Tissue Recipe and Calibration Requirements". The density used to determine SAR from the measurements was the recommended 1040 kg/m^3 found in Appendix C of Supplement C to OET Bulletin 65, Edition 97-01).

Dielectric parameters of the simulated tissue material were determined using a Hewlett Packard 8510 Network Analyzer, a Hewlett Packard 809B Slotted Line Carriage, and an APREL SLP-001 Slotted Line Probe.



| | APREL | OET 65 Supplement | Δ (%) (OET) |
|------------------------------------|-------|-------------------|-------------|
| Dielectric constant, ϵ_r | 41.81 | 43.37 | 3.6 % |
| Conductivity, σ [S/m] | 1.86 | 1.2 | 35.48 % |
| Tissue Conversion Factor, γ | 5.2 | - | - |

Table 3. Dielectric Properties of the Simulated Head Tissue at 1900 MHz

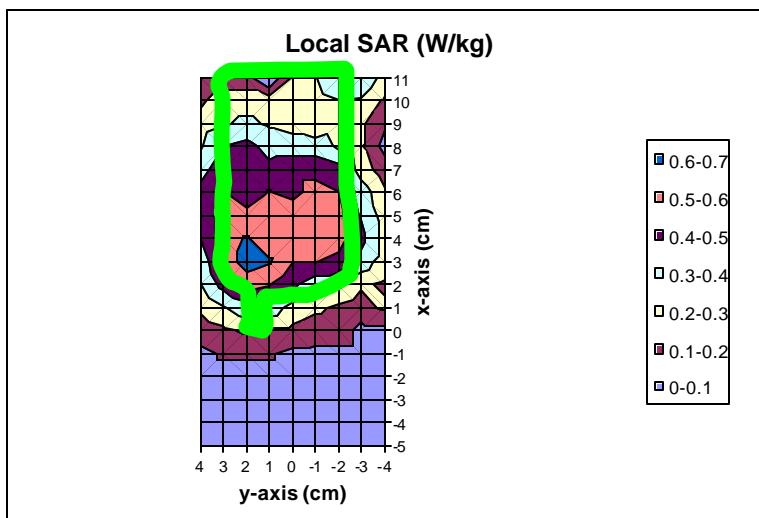


Figure 4. Contour Plot of Area Scan 2.5mm Above Phantom Surface



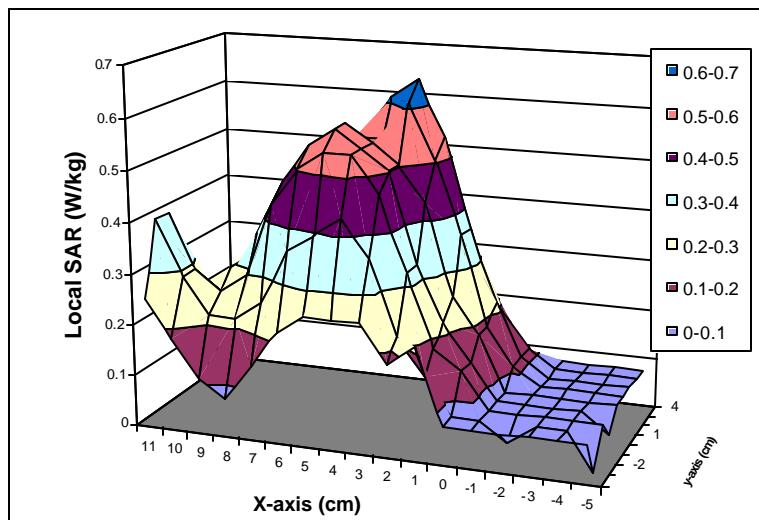


Figure 5. Surface Plot of the Area Scan 2.5mm Above Phantom Surface



APPENDIX B. Uncertainty Budget

| Uncertainties Contributing to the Overall Uncertainty | | |
|--|--------------------|--------------------|
| Type of Uncertainty | Specific to | Uncertainty |
| Power variation due to battery condition | phone | 2.3% |
| Extrapolation due to curve fit of SAR vs depth | phone | 16.3% |
| Extrapolation due to depth measurement | setup | 7.9% |
| Conductivity | setup | 6.0% |
| Density | setup | 2.6% |
| Tissue enhancement factor | setup | 7.0% |
| Voltage measurement | setup | 14.3% |
| Probe sensitivity factor | setup | 3.5% |
| | | 25.3% RSS |

Table 4. Uncertainty Budget



APPENDIX C. Validation Scan on a Flat Phantom

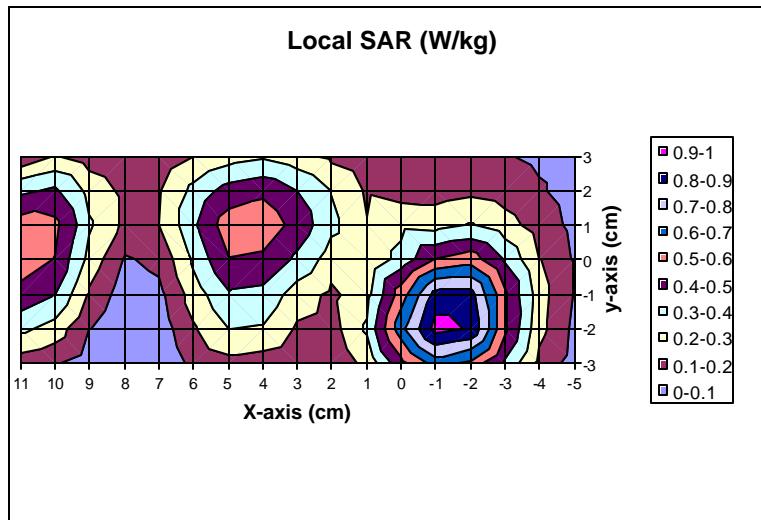


Figure 6. Contour Plot of Reference Area Scan 2.5mm Above Phantom

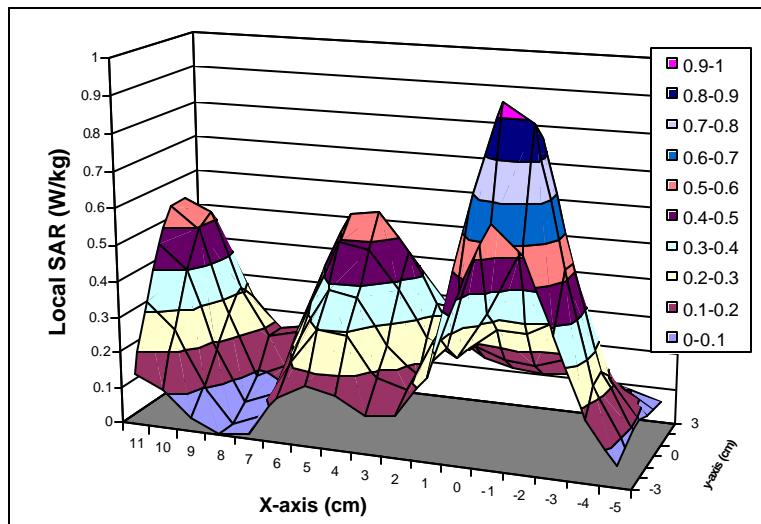


Figure 7. Surface Plot of Reference Area Scan 2.5mm Above Phantom



APPENDIX D. Probe Calibration

NCL CALIBRATION LABORATORIES

Calibration File No.: 301420

CERTIFICATE OF CALIBRATION

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe

Manufacturer: APREL Laboratories/IDX Robotics Inc

Model No.: E-009

Serial No.: 115

Customer: APREL

Asset No.: 301420

Calibration Procedure: SSI/DRB-TP-D01-032

Cal. Date: 9 November, 2000 Cal. Due Date: 8 November, 2001

Remarks: None

Calibrated By: 

NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4161

Page 17 of 17
51 Spectrum Way
Nepean, Ontario, K2R 1E6

© APREL 2000
This report shall not be reproduced, except in full,

Project #: HANB-Visophone-3657

Tel. (613) 820-2730
Fax (613) 820 4161
e-mail: info@aprel.com



at the express written approval of APREL Laboratories.