

**SAR Test Report on
Tri-Band CDMA Cellular Phone with Bluetooth**

FCC Part 22, 24 & 27 Certification	
FCC ID:	OVFKWC-K3802
MODEL:	K38-02
DATE:	October 20, 2008

STATEMENT OF COMPLIANCE

Kyocera Wireless Corp declares under its sole responsibility that the product, FCC ID: OVFKWC-K3802 to which this declaration relates, is in conformity with the appropriate General Population/Uncontrolled RF exposure standards, recommendations and guidelines. It also declares that the product was tested in accordance with the appropriate measurement standards, guidelines and recommended practices.

Any deviations from these standards, guidelines and recommended practices are noted: NONE.

Date of Test:	October 07 – October 17, 2008
Test performed by:	Kyocera Wireless Corp. 10300 Campus Point Drive San Diego, CA 92121
Report Prepared by:	Jeff Flores, Test Technician Intermediate
Report Prepared by:	Thuy To, Regulatory Engineer
Report Reviewed by:	C.K. Li, Director of Regulatory Engineering

Table of Contents

1	INTRODUCTION	3
2	EQUIPMENT UNDER TEST (EUT)	3
3	PRODUCT DESCRIPTION	3
4	ACCESSORIES:	4
5	SAR TEST RESULT SUMMARY	5
5.1	MAXIMUM RESULTS FOUND DURING SAR EVALUATION.....	5
5.2	BODY WORN CONFIGURATION.....	5
5.3	MEASUREMENT UNCERTAINTY	5
6	TEST CONDITIONS	6
6.1	AMBIENT CONDITIONS	6
6.2	RF CHARACTERISTICS OF THE TEST SITE	6
6.3	TEST SIGNAL, FREQUENCIES AND OUTPUT POWER	6
6.3.1	CDMA2000 Test conditions	6
6.4	DEVICE TEST CONDITIONS	8
6.5	MULTIPLE TRANSMITTERS AND ANTENNAS SAR EVALUATIONS	8
6.5.1	Test requirement determination:	8
6.6	SAR TESTS IN MOUTH AND JAW REGIONS OF THE SAM PHANTOM	9
7	DESCRIPTION OF THE TEST EQUIPMENT	10
7.1	DOSIMETRIC SYSTEM	10
7.2	ADDITIONAL EQUIPMENT NEEDED IN VALIDATION	11
7.3	TISSUE STIMULANTS NEED AWS AND BLUETOOTH LIQUID.....	11
7.4	PHANTOMS DESCRIPTION.....	11
7.5	ISOTROPIC E-FIELD PROBE.....	12
8	SYSTEM VALIDATION	13
9	DESCRIPTION OF THE TEST PROCEDURE	14
9.1	TEST POSITIONS	14
9.1.1	Initial Ear Position.....	14
9.1.2	Cheek Position.....	15
9.1.3	Tilt Position.....	15
9.1.4	Body Worn Configuration.....	16
9.2	SCAN PROCEDURES.....	16
9.3	SAR AVERAGING METHODS.....	16
10	MEASUREMENT UNCERTAINTY	17
11	TEST DATA	18
11.1	BODY WORN SAR TEST RESULT	18
12	LIST OF APPENDIX	20

1 INTRODUCTION

This test report describes an environmental evaluation measurement of specific absorption rate (SAR) distribution in simulated human head tissues exposed to radio frequency (RF) radiation from a wireless portable device manufactured by Kyocera Wireless Corp. (KWC). These measurements were performed for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC). The testing was performed in accordance with FCC OET Bulletin 65 Supplement C (01/01) and IEEE P1528/D1.2 issued on April 21, 2003.

2 EQUIPMENT UNDER TEST (EUT)

The wireless device is described as follows:

FCC ID:	OVFKWC-K3802		
Product:	Tri-Band CDMA Phone with Bluetooth		
Trade Name:	Kyocera Wireless Corp.		
Model Number:	K38-02		
EUT S/N:	FFLM0000003700		
Type:	[X] Identical Prototype, [] Pre-production		
Device Category:	Portable		
RF Exposure Environment:	General Population / Uncontrolled		
Antenna Type:	Internal	Antenna Location:	Bottom
Detachable Antenna:	No	Antenna Dimensions (mm):	40.0(L), 13.88 (W)
External Input:	Audio/Digital Data		
Quantity:	Quantity production is planned		
FCC Rule Parts:	§22H	§27H	§24H
Modes:	800 CDMA	1700 CDMA	1900 CDMA
Multiple Access Scheme:	CDMA	CDMA	CDMA
Duty Cycle:	1:1	1:1	1:1
TX Frequency (MHz):	824 – 849	1710 – 1755	1850 - 1910
Emission Designators:	1M25F9W	1M25F9W	1M25F9W
Max. Output Power (W):	1.230 ERP	1.258 ERP	1.479 EIRP

3 PRODUCT DESCRIPTION

The phones OVFKWC-K3802 are Tri-Band CDMA products with Bluetooth.

The phones have assisted GPS software feature enabled to meet the emergency location requirements of the FCC’s E911 Phase II mandate. The CDMA architecture is defined as 800MHz (cellular CDMA), 1700MHz (AWS CDMA) and 1900MHz (PCS CDMA).

The phone is designed in compliance with the technical specifications for compatibility of mobile and base stations in the Cellular Radio telephone service contained in "Cellular System Mobile Station -Land Station Compatibility Specification" as specified in OET Bulletin 53 and TIA Standards

The phone will support certain CDMA2000 radio-configurations (RC) as describes in Exhibit 1 (operation description).

4 ACCESSORIES:

KWC Holster: CE90-M2595-01



5 SAR TEST RESULT SUMMARY

This device has been tested for localised specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1 ~ 1992 and has been tested in accordance with the measurement procedures specified in IEEE P1528_D1.2. Normal antenna operating positions were incorporated, with the device transmitting at frequencies consistent with normal usage of the device. The device has been shown capable of compliance for localised specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE std. C95.1-1992

5.1 Maximum Results Found during SAR Evaluation

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

5.2 Body Worn Configuration

Mode	Ch/f(MHz)	Conducted Power (dBm)	Device Position	Measured (mW/g)	Result
CDMA-800	383 (836.49)	24.75	Flat	0.469	PASSED
CDMA-1700	450 (1732.50)	23.16	Flat	1.04	PASSED
CDMA-1900	600 (1880)	23.31	Flat	0.479	PASSED
Bluetooth-2450	78 (2480)	3.73	Flat	0.00192	PASSED

5.3 Measurement Uncertainty

Combined Uncertainty (Assessment & Source)	± 10.46
Extended Uncertainty (k=2)	± 21.22

6 TEST CONDITIONS

6.1 Ambient Conditions

All tests were performed under the following environmental conditions:

Ambient Temperature:	22 ± 1 Degrees C
Tissue simulating liquid temperature:	22 ± 1 Degrees C
Humidity:	38 %
Pressure:	1015 mB

6.2 RF characteristics of the test site

All SAR measurements were performed inside a shielded room that provide isolation from external EM fields.

The E-field probes of the DASY 4 system are capable of detecting signals as low as 5 μ W/g in the liquid dielectric. External fields are minimising by the shielded room, leaving the phone as the dominant radiation source. Two 2-foot square ferrite panels are placed on the floor of the room beneath the phantom area of the DASY system to minimise reflected energy that would otherwise re-enter the phantom and combine constructively or destructively with the desired fields. These ferrite panels provide roughly 12 to 13 dB of attenuation in the frequency range of 900 MHz, and 7 to 8 dB of attenuation in the frequency range of 1.9 GHz.

6.3 Test Signal, Frequencies and Output Power

In all operating bands, the measurements were performed on low, mid and high channels. The phone was set to nominal maximum power level during all tests and at the beginning of each test.

DASY4 system measures power drift during SAR testing by comparing E-field in the same location at the beginning and at the end of measurement. These records were used to monitor stability of power output.

6.3.1 CDMA2000 Test conditions

The device supports CDMA2000 in 1X (Phase I, Protocol revision 6) mode only. CDMA2000 1X includes TIA/EIA-95B as a subset and was approved for publishing in July 1999. It provides voice and data capabilities within a standard 1.25 MHz CDMA channel. This RF bandwidth is identical to the legacy IS-95 B system standard.

6.3.1.1 Head SAR Measurements

SAR for head exposure configurations was measured in RC3 with the EUT configured to transmit at full rate using Loopback Service Option SO55. SAR for RC1 was not required when the maximum average output of each channel was less than ¼ dB higher than that measured in RC3. Otherwise, SAR was measured on the maximum output channel in RC1 using the exposure configuration that results in the highest SAR for that channel in RC3.

6.3.1.2 Body SAR Measurements

SAR for body exposure configurations was measured in RC3 with the DUT configured to transmit at full rate on FCH with all other code channels disabled using TDSO / SO32. SAR for multiple code channels (FCH + SCH_n) was not required when the maximum average output of each RF channel was less than ¼ dB higher than that measured with FCH only. Otherwise, SAR was measured on the maximum output channel (FCH + SCH_n) with FCH at full rate and SCH₀ enabled at 9600 bps using the exposure configuration that results in the highest SAR for that channel with FCH only. When multiple code channels were enabled, the DUT output may shift by more than 0.5 dB and lead to higher SAR drifts and SCH dropouts.

Body SAR in RC1 was not required when the maximum average output of each channel was less than ¼ dB higher than that measured in RC3. Otherwise, SAR was measured on the maximum output channel in RC1; with Loopback Service Option SO55, at full rate, using the body exposure configuration that resulted in the highest SAR for that channel in RC3.

Table 6.3 below shows the maximum power level vs RCs

CONFIGURATION	CONDUCTED POWER (dBm) (AVG)								
	CDMA 800			CDMA 1700			CDMA 1900		
	Ch 1013	Ch 383	Ch 777	Ch 25	Ch 450	Ch 875	Ch 25	Ch 600	Ch 1175
	Avg	Avg	Avg	Avg	Avg	Avg	Avg	Avg	Avg
SO2, RC1 Full Rate	24.27	24.91	24.09	23.08	23.18	23.39	23.31	23.42	23.19
SO2, RC3 Full Rate	24.10	24.92	24.20	22.87	23.31	23.42	23.27	23.35	23.10
SO3, RC1 Full Rate	24.36	24.86	24.16	22.93	23.18	23.47	23.33	23.42	23.13
SO3, RC3 Full Rate	24.05	24.74	24.12	22.88	23.15	23.45	23.19	23.37	22.97
SO55, RC1 Full Rate	24.19	24.93	24.13	23.17	23.27	23.40	23.35	23.45	23.14
SO55, RC3 Full Rate	24.32	24.96	24.31	23.18	23.36	23.48	23.37	23.47	23.22
TDSO SO32, RC3 (F-SCH)	24.06	24.75	24.07	22.79	23.16	23.21	23.23	23.31	22.95
TDSO SO32, RC3 (SCH)	24.14	24.88	24.18	23.07	23.19	23.30	23.34	23.41	22.96

Table 6.3 RC Configuration tested at “all up” power control bit.

6.4 Device Test Conditions

The EUT was tested with a fully charged battery as supplied with the handset. Conducted RF power measurements were performed before and after each SAR measurements to confirm the output power.

6.5 Multiple Transmitters and Antennas SAR evaluations

Licensed transmitters required routine SAR evaluation as followed by IEEE 1528 Supplement C 3G FCC SAR Procedures. Stand-alone SAR measurements were tested for each licensed transmitter and reported.

For an unlicensed transmitter such as 802.11 a/b/g and Bluetooth devices that does not transmit simultaneously with other transmitters and its output conducted power is $< 60/f_{(GHz)}$ mW, SAR evaluation is not required.

If the handset contains unlicensed transmitters which may simultaneously transmit with the licensed transmitter, then SAR evaluation procedures “FCC SAR Considerations for Handsets with Multiple Transmitters and antennas, February 2008” were followed. Antenna separation was determined by the closest distance between the antennas. The conducted output power of the unlicensed transmitter was measured and compared with the power reference (P_{ref}) as shown in table 6.5. Both criteria were evaluated to determine whether stand-alone SAR or simultaneous transmission SAR testing is required.

SIMULTANEOUS TRANSMISSION	
Antenna Separation (cm)	P_{ref} Bluetooth (2.45GHz)
≤ 2.5	NA / Standalone SAR Required
> 2.5 and ≤ 5.0	12 mW
> 5.0	24 mW

Table 6.5 Antenna Separation and Unlicensed Transmitter Output Power Threshold

6.5.1 Test requirement determination:

Based on the Antenna separation and output power, Stand-Alone and Simultaneous Transmission SAR testing requirements are listed below:

MEASURED PARAMETERS (UNLICENSED TRANSMITTER)			
Transmitter	Antenna Separation	Output Power*	Highest SAR value (CDMA antenna + Bluetooth antenna)
Bluetooth	0.8 cm	2 mW	0.00192 mW/g
SAR PROCEDURES		TEST REQUIRED	
Stand Alone SAR:		Yes	
Simultaneous Transmission SAR:		No	

*Rounded to the nearest mW

6.6 SAR Tests in Mouth and Jaw Regions of the SAM Phantom

Antennas located near the bottom of a phone may require SAR measurements around the mouth and jaw regions of the SAM head phantom. This typically applies to clam-shell style phones that are generally longer in the unfolded normal use positions or to certain older style long rectangular phones. It has been known for some time that there are SAR measurement difficulties in these regions of the SAM phantom. SAR probes are calibrated in tissue-equivalent liquids with sufficient separation between the probe sensors and nearby physical boundaries to ensure scattering does not affect probe calibration. When the probe tip is moved into tight regions with multiple boundaries surrounding its sensors, probe calibration and measurement accuracy can become questionable. In addition, these measurement locations often require a probe to be tilted at steep angles, where it may no longer comply with calibration requirements and measurement protocols, or satisfy the required measurement uncertainty. In some situations it is not feasible to tilt the probe or rotate the phantom, as suggested by measurement standards, to conduct these measurements.

In order to ensure there is sufficient conservativeness for ensuring compliance until practical solutions are available, additional measurement considerations are necessary to address these technical difficulties. When measurements are required near the mouth, nose, jaw or similar tight regions of the SAM phantom, area or zoom scans are often unable to fully enclose the peak SAR location as required by IEEE 1528 and Supplement C, due to probe orientation and positioning difficulties. Even when limited measurements are possible, the test results could be questionable due to probe calibration and measurement uncertainty issues. Under these circumstances, the following procedures apply:

The SAR required in these regions of SAM should be measured using a flat phantom.

- Rectangular shaped phones should be positioned with its bottom edge positioned from the flat phantom with the same distance provided by the cheek touching position using SAM. The ear reference point (ERP, as defined for SAM) of the phone should be positioned $\frac{1}{2}$ cm from the flat phantom shell.
- Clam-shell phones should be positioned with the hinge against a smooth edge of the flat phantom where the upper half of the phone is unfolded and extended beyond the phantom side wall. The lower half of the phone is secured in the test device holder at a fixed distance below the flat phantom determined by the minimum separation along the lower edge of the phone in the cheek touching position using SAM. If there is substantial variation in separation distance along the lower edge of a clam-shell phone when placed in the cheek touching position using SAM, the FCC Laboratory may be contacted for additional guidance to position the phone for testing.

The flat phantom data should allow test results to be compared uniformly across measurement systems, until suitable solutions are available in measurement standards to address certain probe calibration and positioning issues, due to implementation differences between horizontal and up-right SAM configurations. These flat phantom procedures are only applicable to stand-alone SAR evaluation in tight regions of the SAM phantom, where measurement is not feasible or test results can be questionable due to probe calibration and accessibility issues. Details on device positioning and photos showing how separation distances are determined should be included in the SAR report. SAR for other regions of the head must be evaluated using SAM; therefore, a phone with antennas at different locations may require flat and SAM phantom evaluation for the different antennas. When simultaneous transmission SAR evaluation is necessary in these regions of SAM and until practical solutions are available, the FCC Laboratory should be contacted for interim guidance.

7 DESCRIPTION OF THE TEST EQUIPMENT

7.1 Dosimetric System

The measurements were performed with an automated near-field scanning system (as shown in Figure 7.1), DASY4, manufactured by Schmid & Partner Engineering AG (SPEAG) of Zurich, Switzerland. The system is comprised of high precision robot, robot controller, computer, near-field probe, probe alignment sensor and the SAM phantom containing brain or muscle equivalent material. The overall RSS uncertainty of the measurement system is $\pm 10.46\%$ with an expanded uncertainty of $\pm 21.22\%$ (K=2). The measurement uncertainty budget is given in section 10. Below is a list of the calibrated equipment used for the measurements:

Test Equipment	Serial Number	Cal. Due Date
DASY4 DAE4	602	06-25-09
E-field Probe ET3DV6	1664	06-23-09
E-field Probe ES3DV3	3078	06-23-09
Dipole Validation kit, D835V2	467	09-16-10
Dipole Validation kit, D1800	220	11-13-09
Dipole Validation kit, D1900V2	5d016	09-15-10
Dipole Validation kit, D2450V2	776	08-20-09

The calibration records of E-field probe and dipoles are attached in Appendix C and Appendix D respectively.

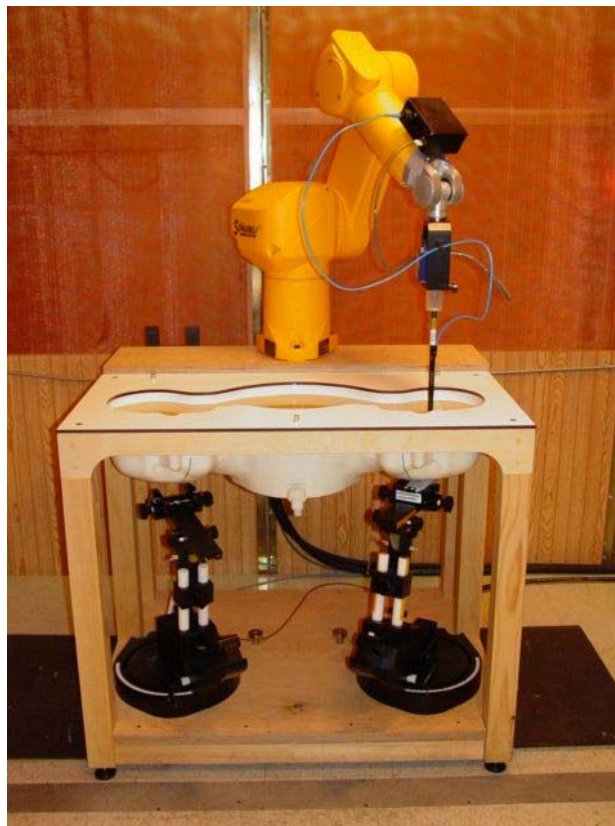


Figure 7.1 DASY 4 System

7.2 Additional equipment needed in validation

Test Equipment	Serial Number	Cal. Due Date
Communication Test Set Agilent 8960	GB44052736	06-13-10
Signal Generator, Agilent ESG-D3000A	MY44270167	04-05-09
Power meter, Giga-tronics 8541C	1833726	03-26-09
Power Sensor, Giga-tronics 80601A	1831776	04-07-09
Serial Network Analyzer, Agilent E5062A	MY44100250	02-05-09
Electronic Calibration Module, Agilent	1763	02-14-09
Thermometer	186700	06-10-09
Dielectric Probe, HP 85070E	--	No cal required

7.3 Tissue Stimulants Need AWS and Bluetooth liquid

All dielectric parameters of tissue stimulants were measured within 24 hours of SAR measurements. The depth of the tissue stimulant in the ear reference point and flat reference point of the phantom were at least 15 cm. during all the tests. The depth of the liquid is measured by running a program that brings the probe to the bottom surface of the phantom then raise it up 15 centimeters. The operator at this point performs a visual inspection and makes sure that the liquid level is at or above the probe tip.

The list of ingredients and the percent composition used for the Head and Muscle tissue simulates are listed in the table below:

Ingredient	835 MHz		1700 MHz		1900 MHz		2450 MHz	
	HEAD	MUSCLE	HEAD	MUSCLE	HEAD	MUSCLE	HEAD	MUSCLE
Water	51.07%	65.45%	56.6%	68%	54%	69.91%	55 %	68.64%
Cellulose	0.23%	--	--	--	--	--	--	--
Glycol monobutyl	--	--	43%	31.5%	44.91%	29.96%	45%	31.37%
Sugar	47.31%	34.31%	--	--	--	--	--	--
Preventol	0.24%	0.1%	--	--	--	--	--	--
Salt	1.15%	0.62%	0.4%	0.5%	0.21%	0.13%	--	--

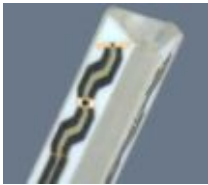
The ingredients above are adopted from Application Note: Recipes for Head/Muscle Tissue Simulating Liquid by SPEAG.

7.4 Phantoms Description

SAM v4.0 phantom, manufactured by SPEAG, was used during the measurement. It has fiberglass shell integrated in a wooden table. The shape of the shell corresponds to the phantom defined in IEEE 1528/D1.2. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. Reference markings on the phantom allow the complete set-up of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

The thickness of phantom shell is 2mm except for the ear, where an integrated ear spacer provides 6mm spacing from the tissue boundary. Manufacturer reports tolerance in shell thickness to be ± 0.1mm.

7.5 Isotropic E-Field Probe

<p>Model:</p>	<ul style="list-style-type: none"> ET3DV6 
<p>Construction:</p>	<ul style="list-style-type: none"> Symmetrical design with triangular core Built-in optical fiber for surface detection system Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., glycol)
<p>Calibration:</p>	<ul style="list-style-type: none"> Calibration certificate in Appendix C
<p>Frequency:</p>	<ul style="list-style-type: none"> 10MHz to 3GHz (dosimetry); Linearity: $\pm 0.2\text{dB}$ (30MHz to 3GHz)
<p>Optical Surface:</p>	<ul style="list-style-type: none"> $\pm 0.2\text{mm}$ repeatability in air and clear liquid over diffuse reflecting
<p>Detection:</p>	<ul style="list-style-type: none"> Surface
<p>Directivity:</p>	<ul style="list-style-type: none"> $\pm 0.2\text{dB}$ in HSL (rotation around probe axis) $\pm 0.4\text{dB}$ in HSL (rotation normal to probe axis)
<p>Dynamic Range:</p>	<ul style="list-style-type: none"> 5 uW/g to > 100 mW/g; Linearity: $\pm 0.2\text{dB}$
<p>Dimensions:</p>	<ul style="list-style-type: none"> Overall length: 330mm Tip length: 16mm Body diameter: 12mm Tip diameter: 6.8mm Distance from probe tip to dipole centers: 2.7mm
<p>Application:</p>	<ul style="list-style-type: none"> General dosimetry up to 3GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms.

8 SYSTEM VALIDATION

The probes are calibrated annually by the manufacturer. Dielectric parameters of the stimulating liquids are measured with an automated Hewlett Packard 85070E dielectric probe in conjunction with an Agilent E5062A ENA serial network analyser.

The SAR measurements of the device were done within 24 hours of system accuracy verification, which was done using the dipole validation kit. Power level of 20dBm was supplied to a dipole antenna placed under the flat section of SAM phantom. The validation results are in the table below and printouts of the validation test are attached in Appendix A. All the measured parameters are within the specification.

The system validation with head tissues was used for the device testing in muscle. Based on OET 65 Supplement C EAB Part 22/27/24 SAR review Reminder Sheet 01/2002, this is a valid test.

Tissue	Freq. (MHz)	Description	Validation SAR (mW/g), 1g	Dielectric Parameters		Temp. (°C)	Test date	Comments Validation testing -
				ϵ_r	σ (S/m)			
Muscle	835	Measured	1.01	56.12	0.940	22±1	10-09-08	For device testing in Muscle
		SPEAG Reference	0.996	55.20	0.970	22.0	09-16-08	From Speag Certificate
		FCC Reference*	--	55.20	0.970	--	--	
	1800	Measured	3.90	55.23	1.54	22±1	10-08-08	For device testing in Muscle
		SPEAG Reference	3.80	53.30	1.52	22.0	11-13-07	From Speag Certificate
		FCC Reference*	--	53.48	1.48	20-26	--	
	1900	Measured	4.26	53.40	1.50	22±1	10-07-08	For device testing in Muscle
		SPEAG Reference	4.08	53.30	1.52	22.0	09-15-08	From Speag Certificate
		FCC Reference*	--	53.30	1.52	20-26	--	
	2450	Measured	5.11	51.03	2.00	22±1	10-17-08	For device testing in Muscle.
		SPEAG Reference	5.04	52.70	1.95	22.0	08-20-08	From Speag Certificate
		FCC Reference*	--	52.70	1.95	20-26	--	

FCC reference values are adopted from OET Bulletin 65 (97-01) Supplement C (01-01).

9 DESCRIPTION OF THE TEST PROCEDURE

Measurements were made on both left hand side and right hand side of the phantom.

The device was position against phantom according to OET Bulletin 65 (97-01) Supplement C (01-01). Definitions of terms used in aligning the device to a head phantom are available in IEEE Standard P1528/D1.2 “Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques”

9.1 Test Positions

The device was placed in the holder. The bottom of the device aligns with the bottom of the holder clamp to provide a standard positioning and ensure enough free space for antenna.

Device holder was provided by SPEAG together with DAS4.

9.1.1 Initial Ear Position

The device was initially positioned with the earpiece region pressed against the ear spacer of a head phantom parallel to the “Neck-Front” (N-F) line defined along the base of the ear spacer that contains the “Ear Reference Point” (ERP). The “test device reference point” (point A) is aligned to the ERP on the head phantom and the “vertical centerline” is aligned to the “phantom reference plane”.

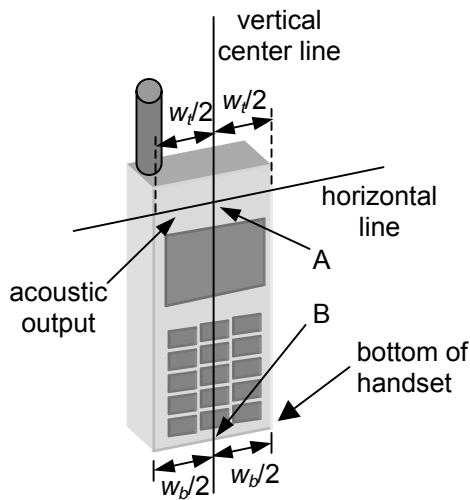


Figure 7-1 – Handset vertical and horizontal reference lines.

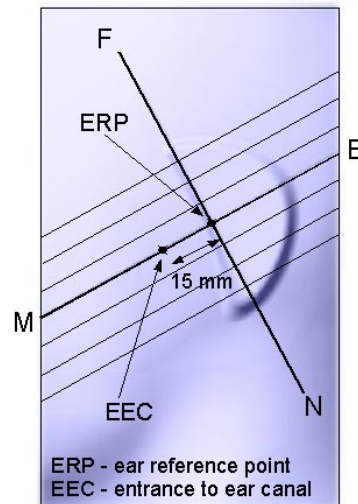


Figure 7-2 - Close up side view of phantom showing the ear region.

9.1.2 Cheek Position

“Initial ear position” alignments are maintained and the device is brought toward the mouth of the head phantom by pivoting along the “Neck-Front” line until any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom or when any portion of a foldout, sliding or similar keypad cover opened to its intended self-adjusting normal use position is in contact with the cheek or mouth of the phantom.

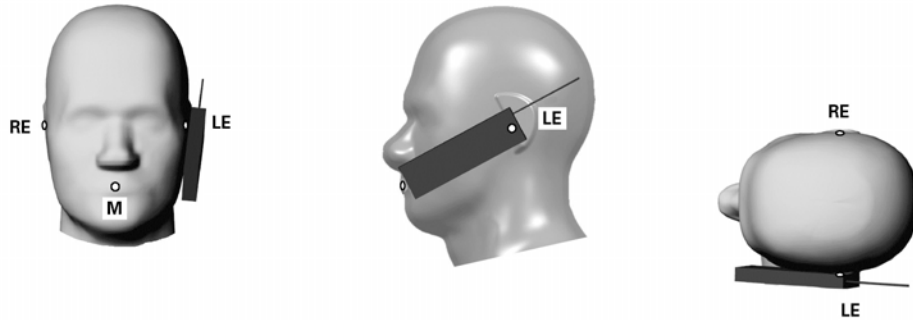


Figure 7.3 - Phone position 1, “cheek” or “touch” position.

9.1.3 Tilt Position

In the “cheek position”, if the earpiece of the device is not in full contact with the phantom’s ear spacer and the peak SAR location for the “cheek position” is located at the ear spacer region or corresponds to the earpiece region of the handset, the device is returned to the “initial ear position” by rotating it away from the mouth until the earpiece is in full contact with the ear spacer. Otherwise, the device is moved away from the cheek perpendicular to the line passes through both “ear reference points” for approximate 2-3cm. While it is in this position, the device is tilted away from the mouth with respect to the “test device reference point” by 15°. After the tilt, it is then moved back toward the head perpendicular to the line passes through both “ear reference point” until the device touches the phantom or the ear spacer. If the antenna touches the head first, the positioning process is repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously.

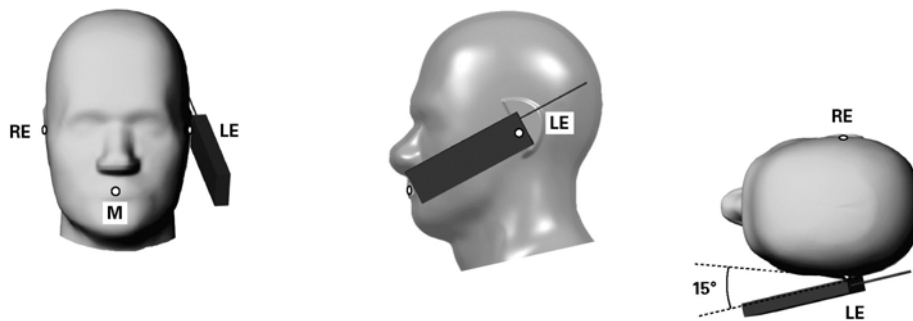


Figure 7.3 - Phone position 2, “tilted” position.

9.1.4 Body Worn Configuration

KWC body worn accessories were tested for the FCC RF exposure compliance. The device was positioned into the carrying case and placed below the flat phantom. Hands-free headset was connected during measurements.

The SAR levels were also measured with 15mm air space for the hands-free application, which allow user to use other body-worn accessories that contains no metal and provides at least 15mm separation from the closest point of the handset to the body.

9.2 Scan Procedures

First, coarse scans are used for a quick determination of the field distribution. Then an area scan measures all reachable points, it computes all of the field maxima found in the scanned area, within a range of 2dB as specified in IEEE P1528, (see the configuration below). For cases where multiple maxima were detected, the number of zoom scans could be increased accordingly.

Next a cube scan, 7x7x7 points (spacing between each point is 5x5x5mm), is performed around the highest E-field value to determine the averaged SAR-distribution over 1g. If two peaks are within 2dB of the highest one, two zoom scans are performed to provide the evaluations. A fine resolution volume scan determines the one-gram average SAR for both peaks.

9.3 SAR Averaging Methods

The maximum SAR value is average over its volume using interpolation and extrapolation.

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot" –condition [W. Gander, Computermathematik, p. 141-150] (x, y and z – directions) [numerical Recipes in C, Second Edition, p 123].

The extrapolation is based on least square algorithm [W. Gander, Computermathematik, p. 168-180]. Through the points in the first 30mm in all z-axis, polynomials of order four are calculated. This polynomial is then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1mm from one another.

10 MEASUREMENT UNCERTAINTY

Description of individual measurement uncertainty

Uncertainty Description	Uncert. Value (± %)	Prob. Dist.	Div	C _i ¹ 1g	Stand. Uncert (1g) (±%)	V _i ² or V _{eff}
Measurement system						
Probe calibration	4.8	N	1	1	4.8	∞
Axial isotropy	4.7	R	√3	0.7	1.9	∞
Hemispherical Isotropy	9.6	R	√3	0.7	3.9	∞
Boundary effects	1.0	R	√3	1	0.6	∞
Linearity	4.7	R	√3	1	1.0	∞
System Detection limit	1.0	R	√3	1	0.5	∞
Readout Electronics	1.0	N	1	1	1.0	∞
Response Time	0.8	R	√3	1	0.5	∞
Integration Time	2.6	R	√3	1	1.5	∞
RF ambient conditions	3.0	R	√3	1	1.7	∞
Mech. Constrains of robot	0.4	R	√3	1	0.2	∞
Probe positioning	2.9	R	√3	1	1.7	∞
Extrapolation, integration and Integration Algorithms for Max. SAR Evaluation	1.0	R	√3	1	0.6	∞
Test Sample Related						
Device positioning	3.0	N	1	1	3.0	∞
Device Holder	3.0	N	1	1	3.0	∞
Power drift	7.0	N	√3	1	4.0	∞
Phantom and setup						
Phantom uncertainty	4.0	R	√3	1	2.3	∞
Liquid conductivity (target)	5.0	R	√3	0.6	1.7	∞
Liquid conductivity (meas.)	5.0	N	1	0.6	3.0	∞
Liquid permittivity (target)	5.0	R	√3	0.6	1.7	∞
Liquid permittivity (meas.)	5.0	N	1	0.6	1.5	∞
Combined Standard Uncertainty:					10.46	
Extended Standard Uncertainty (k=2):					21.22	

N: Normal
R: Rectangular

11 TEST DATA

11.1 Body Worn SAR Test Result

For each mode, corresponding SAR distribution printouts of maximum results per set-up (in blue below), i.e., the device was tested with a holster CE90-M2595-01 as shown in Appendix B. The rest of SAR distributions are substantially similar or equivalent to the plots submitted regardless of used channel. The test was performed with flip closed and face down position since this is the only configuration allowed with this holster. Only the worst-case result was reported.

Waist Level SAR with KWC Body Worn Accessories

CDMA 800 BODY		Channel:			1013	383	777
		Frequency (MHz):			824.70	836.49	848.31
Accessory	Configuration	Test Position	Flip Position	Phone Position	SAR, 1g (W/kg)		
Holster (CE90-M2595-01)	RC1 SO55	Flat	Closed	Face Down			
	RC3 – SO32 (FCH)	Flat	Closed	Face Down		0.469	
	RC3 – SO32 (FCH+SCH)	Flat	Closed	Face Down			

Note: If the SAR measured at the mid-channel is at least 3dB lower than the SAR limit, testing at the low and high channels were no longer performed.

CDMA 1700 BODY		Channel:			25	450	875
		Frequency (MHz):			1711.25	1732.50	1753.75
Accessory	Configuration	Test Position	Flip Position	Phone Position	SAR, 1g (W/kg)		
Holster (CE90-M2595-01)	RC1 SO55*	Flat	Closed	Face Down	0.888	1.04	0.942
	RC3 – SO32 (FCH)	Flat	Closed	Face Down			
	RC3 – SO32 (FCH+SCH)	Flat	Closed	Face Down			

Note: If the SAR measured at the mid-channel is at least 3dB lower than the SAR limit, testing at the low and high channels were no longer performed.

* Used this configuration based on original worst-case configuration.

CDMA 1900 BODY		Channel:			25	600	1175
		Frequency (MHz):			1851.25	1880	1908.75
Accessory	Configuration	Test Position	Flip Position	Phone Position	SAR, 1g (W/kg)		
Holster (CE90-M2595-01)	RC1 SO55	Flat	Closed	Face Down			
	RC3 – SO32 (FCH)	Flat	Closed	Face Down		0.479	
	RC3 – SO32 (FCH+SCH)	Flat	Closed	Face Down			

Note: If the SAR measured at the mid-channel is at least 3dB lower than the SAR limit, testing at the low and high channels were no longer performed.

Bluetooth 2450Mhz BODY		Channel:			0	39	78
		Frequency (MHz):			2402	2441	2480
		Conducted Power:			3.01	3.26	3.73
Accessory	Configuration	Test Position	Flip Position	Phone Position	SAR, 1g (W/kg)		
CE90-M2595-01	Bluetooth **	Flat	Closed	Face Down			0.00192

Note: If the SAR measured at the mid-channel is at least 3dB lower than the SAR limit, testing at the low and high channels were no longer performed.

** Tested at worst position and if the SAR measured at the highest conducted power is at least 3dB lower than the SAR limit, testing at the other channels were no longer performed.

12 LIST OF APPENDIX

Appendix	Description	Note
A	Validation Test Plots	<i>Please see separate attachment</i>
B	SAR Distribution Plots	<i>Please see separate attachment</i>
C	Probe Calibration Parameters	<i>Please see separate attachment</i>
D	Dipole Calibration Parameters	<i>Please see separate attachment</i>
E	EUT Setup Photos	<i>Please see separate attachment</i>