

**SAR Test Report on
Single-Band Single-mode CDMA Cellular Phone**

FCC Part 22 & 24 Certification	
FCC ID:	OVFKWC-KX17
MODEL:	KX17
DATE:	May 25, 2005

STATEMENT OF COMPLIANCE	
<p>Kyocera Wireless Corp declares under its sole responsibility that the product, FCC ID: OVFKWC-KX17 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.</p> <p>Any deviations from these standards, guidelines and recommended practices are noted: NONE.</p>	
Test:	Date of May 18-19, 2005
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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-KX17		
Product:	Single-mode Single-Band Digital Phone		
Trade Name:	Kyocera Wireless Corp		
Model Number:	KX17		
EUT S/N:	97DX----1B277D		
Type:	[] Identical Prototype, [X] Pre-production		
Device Category:	Portable		
RF Exposure Environment:	General Population / Uncontrolled		
Antenna Type:	Internal	Antenna Location:	Top on the rear housing
Detachable Antenna:	No	Antenna Dimensions:	NA
External Input:	Audio/Digital Data		
Quantity:	Quantity production is planned		
FCC Rule Parts:	§22H		
Modes:	800 CDMA		
Multiple Access Scheme:	CDMA		
Duty Cycle:	1:1		
TX Frequency (MHz):	824 – 849		
Emission Designators:	1M25F9W		
Max. Output Power (W):	0.144 ERP		

3 PRODUCT DESCRIPTION

The phones OVFKWC-KX17 are single-mode, single-band CDMA products. The phones have assisted GPS software feature enabled to meet the emergency location requirements of the FCC's E911 Phase II mandate. The architecture is defined as 800MHz cellular 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 Battery Model

- Standard: CV90-M4337-03 (3.7V, 810mAh)



KWC Standard Case: CV90-P0305-01



KWC Phone Clip: CV90-P0307-01



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 Head Configuration

Mode	Ch/f(MHz)	Conducted Power (dBm)	Device Position	Measured (mW/g)	Result
CDMA-800	777 (848.31)	23.86	Left Cheek	1.46	PASSED

5.3 Body Worn Configuration (with KWC body worn accessories)

Mode	Ch/f(MHz)	Conducted Power (dBm)	Device Position	Measured (mW/g)	Result
CDMA-800	383 (836.49)	23.88	Waist level	0.51	PASSED

5.4 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 minimise 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

The device was controlled by using Kyocera Wireless Phone Support Toolkit, Test Code Controller.

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 the 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.

6.4 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.

7 DESCRIPTION OF THE TEST EQUIPMENT

7.1 Dosimetric System

The measurements were performed with an automated near-field scanning system, 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 6. Below is a list of the calibrated equipment used for the measurements:

Test Equipment	Serial Number	Cal. Due Date
DASY4 DAE3 V1	602	08-27-05
E-field Probe ET3DV6	1664	09-02-05
Dipole Validation kit, D835V2	454	04-20-06

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

7.2 Additional equipment needed in validation

Test Equipment	Serial Number	Cal. Due Date
Signal Generator, Marconi Instrument 2026	112240/036	03-14-07
Power meter, Giga-tronics 8541C	1833347	12-20-05
Power Sensor, Giga-tronics 80601A	1831055	04-20-06
ENA Serial Network Analyzer, Agilent E5062A	MY44100250	12-09-05
Thermometer	186700	03-01-06
Dielectric Probe, HP 85070E	--	no cal required

7.3 Tissue Stimulants

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	
	HEAD	MUSCLE
Water	51.07%	65.45%
Cellulose	0.23%	--
Sugar	47.31%	34.31%
Preventol	0.24%	0.1%
Salt	1.15%	0.62%

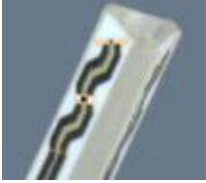
The ingredients above are adopted from Application Note: Recipes for Head/Muscle Tissue Simulating Liquid by SPEAG.

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 $\pm 0.1\text{mm}$.

7.5 Isotropic E-Field Probe

Model:	<ul style="list-style-type: none"> ET3DV6 
Construction:	<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)
Calibration:	<ul style="list-style-type: none"> Calibration certificate in Appendix C
Frequency:	<ul style="list-style-type: none"> 10MHz to 3GHz (dosimetry); Linearity: $\pm 0.2\text{dB}$ (30MHz to 3GHz)
Optical Surface:	<ul style="list-style-type: none"> $\pm 0.2\text{mm}$ repeatability in air and clear liquid over diffuse reflecting
Detection:	<ul style="list-style-type: none"> Surface
Directivity:	<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)
Dynamic Range:	<ul style="list-style-type: none"> 5 $\mu\text{W/g}$ to $> 100 \text{ mW/g}$; Linearity: $\pm 0.2\text{dB}$
Dimensions:	<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
Application:	<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 22/24 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)			
Head	835	Measured	1.05	41.8	.929	22±1	05-18-05	For device testing in head liquid
		Measured	1.02	41.6	.923	22±1	05-19-05	For device testing in muscle
		SPEAG Reference	1.02	42.8	0.94	--	04-20-04	
		FCC Reference*	--	41.5	0.90	20-26	--	
Muscle	835	Measured	--	56.7	0.928	22±1	05-19-05	For device testing in muscle
		FCC Reference*	--	55.2	0.97	--	--	

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 DASY4.

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”.

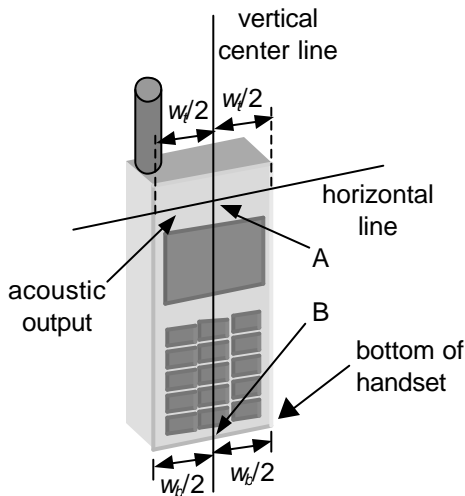


Figure 9-1 – Handset vertical and horizontal reference lines.

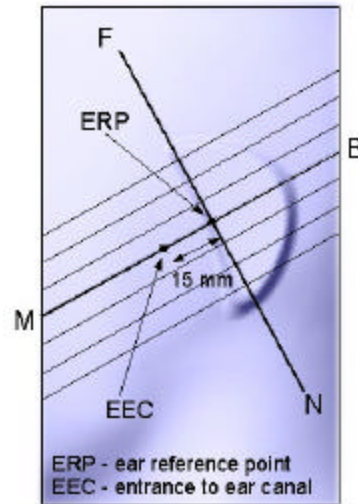


Figure 9-2 - Close up side view of phantom showing the ear region.

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.

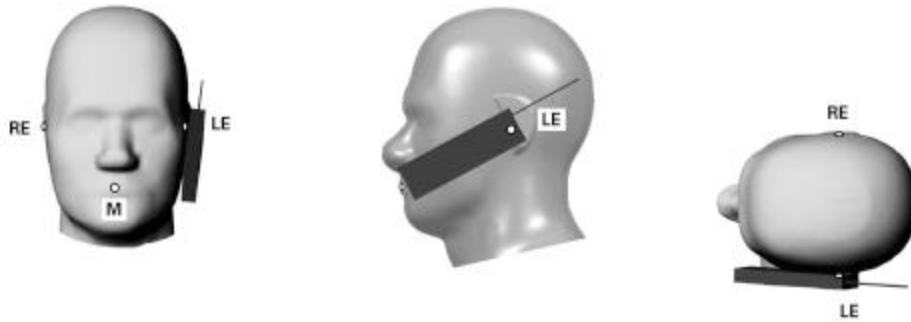


Figure 9.3 - Phone position 1, “cheek” or “touch” position.

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 9.4 - 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 25.0mm air space for the hands-free application, which allow user to use other body-worn holster that contains no metal and provides at least 25.0mm 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 (\pm %)	Prob. Dist.	Div	C_i^1 1g	Stand. Uncert (1g) (\pm %)	V_i^2 or V_{eff}
Measurement system						
Probe calibration	4.8	N	1	1	4.8	8
Axial isotropy	4.7	R	$\sqrt{3}$	0.7	1.9	8
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0.7	3.9	8
Boundary effects	1.0	R	$\sqrt{3}$	1	0.6	8
Linearity	4.7	R	$\sqrt{3}$	1	1.0	8
System Detection limit	1.0	R	$\sqrt{3}$	1	0.5	8
Readout Electronics	1.0	N	1	1	1.0	8
Response Time	0.8	R	$\sqrt{3}$	1	0.5	8
Integration Time	2.6	R	$\sqrt{3}$	1	1.5	8
RF ambient conditions	3.0	R	$\sqrt{3}$	1	1.7	8
Mech. Constrains of robot	0.4	R	$\sqrt{3}$	1	0.2	8
Probe positioning	2.9	R	$\sqrt{3}$	1	1.7	8
Extrapolation, integration and Integration Algorithms for Max. SAR Evaluation	1.0	R	$\sqrt{3}$	1	0.6	8
Test Sample Related						
Device positioning	3.0	N	1	1	3.0	8
Device Holder	3.0	N	1	1	3.0	8
Power drift	7.0	N	$\sqrt{3}$	1	4.0	8
Phantom and setup						
Phantom uncertainty	4.0	R	$\sqrt{3}$	1	2.3	8
Liquid conductivity (target)	5.0	R	$\sqrt{3}$	0.6	1.7	8
Liquid conductivity (meas.)	5.0	N	1	0.6	3.0	8
Liquid permittivity (target)	5.0	R	$\sqrt{3}$	0.6	1.7	8
Liquid permittivity (meas.)	5.0	N	1	0.6	1.5	8
Combined Standard Uncertainty:					10.46	
Extended Standard Uncertainty (k=2):					21.22	

N: Normal

R: Rectangular

11 TEST DATA

11.1 Head SAR Test Results

The following table lists the SAR results in every test position. The maximum SAR results (in bold blue color) in every device positions (cheek or tilt) are shown in Appendix B as SAR distribution printouts. Z-axis plots were also included to show that the liquid was deep enough. The rest of the SAR distribution plots are substantially similar or equivalent to the plots submitted.

CDMA 800 Head	Channel:		1013	383	777
	Frequency (MHz):		824.70	836.49	848.31
	Conducted Power (dBm):		23.90	23.88	23.86
Configuration	Test Position	Antenna Position	SAR, 1g (W/kg)		
KX17	Left Cheek/Touch	Fixed	1.35	1.42	1.46
	Left Ear/Tilt	Fixed	0.76	0.78	0.79
	Right Cheek/Touch	Fixed	1.28	1.37	1.41
	Right Ear/Tilt	Fixed	0.75	0.78	0.77

11.2 Body Worn SAR Test Result

The device was tested with a 25mm air gap and with KWC body-worn accessories. The maximum SAR results (in bold blue color) in each accessory are shown in Appendix B as SAR distribution printouts. The rest of the SAR distributions are substantially similar or equivalent to the plots submitted, regardless of what accessory was used.

Waist Level SAR with KWC Body Worn Accessories

CDMA 800 Body	Channel:		1013	383	777
	Frequency (MHz):		824.70	836.49	848.31
	Conducted Power (dBm):		23.90	23.88	23.86
Configuration	Accessories	Test Position	Phone Position	SAR, 1g (W/kg)	
KX17	Air Gap – 25mm	Flat	Face Down		0.51
	Standard Case: (CV90-P0305-01)	Flat	Face Down		0.38
	Phone Clip: (CV90-P0307-01)	Flat	Face Down		0.41

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.

12 TEST SETUP PHOTOS

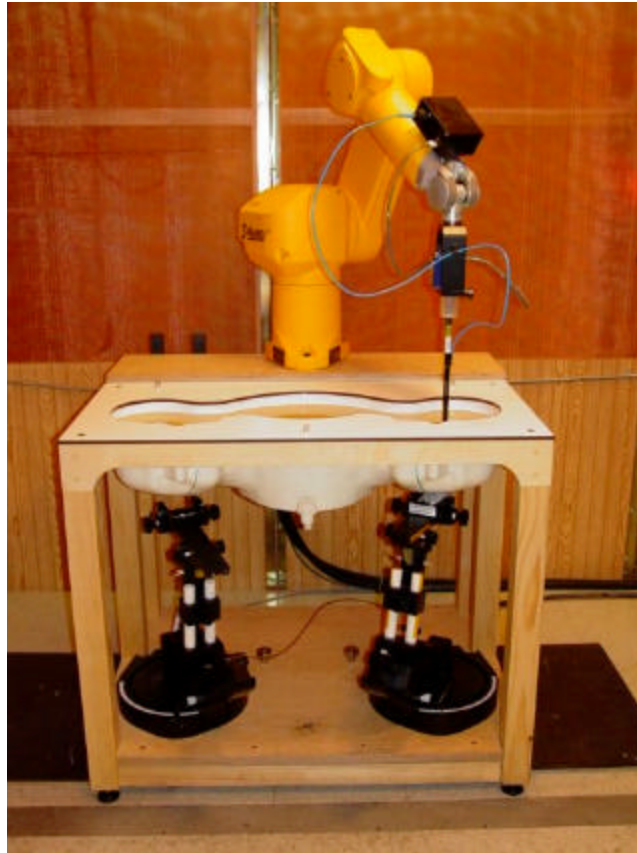


Figure 12.1 DASY 4 System

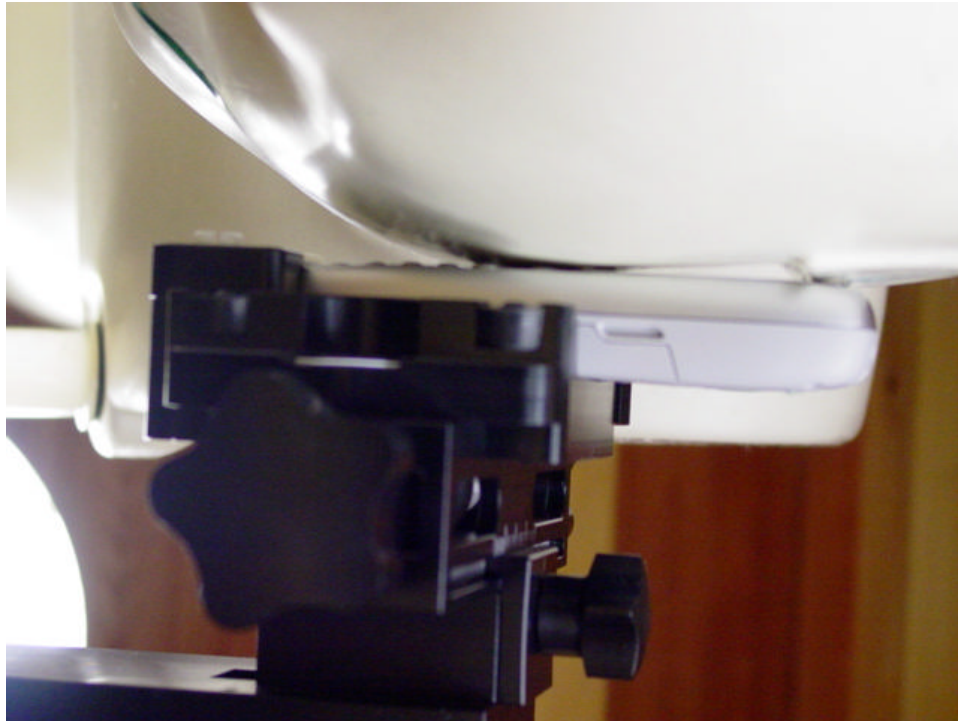


Figure 12.2 phone against the head (left cheek position)



Figure 12.3 phone against the head (left tilt position)

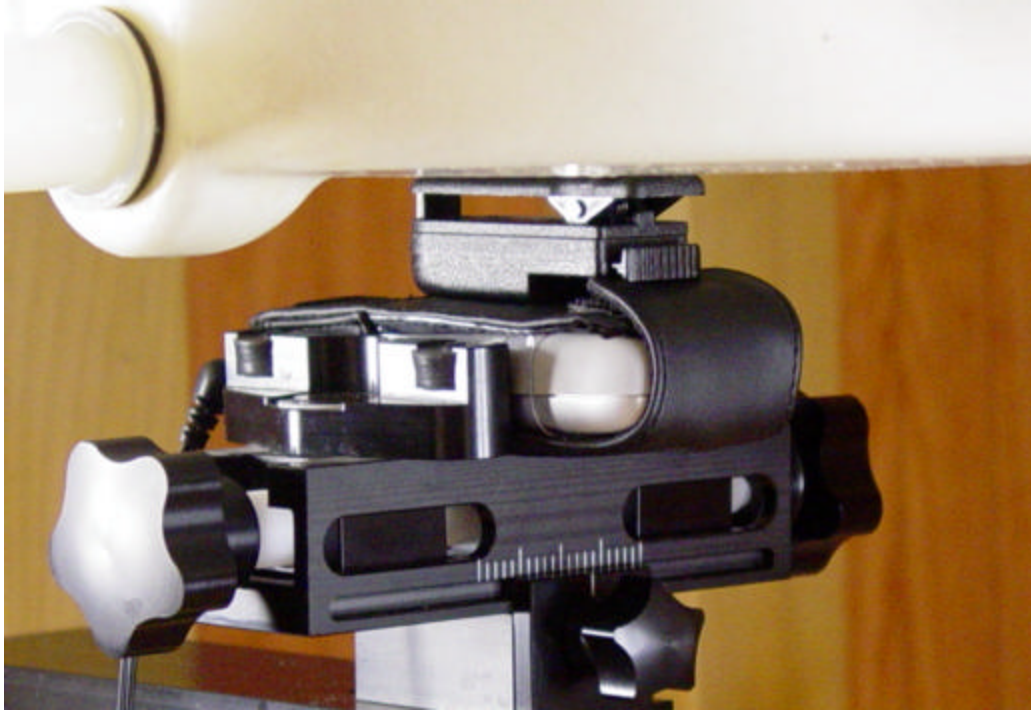


Figure 12.4 Body SAR Set-up (with standard case)

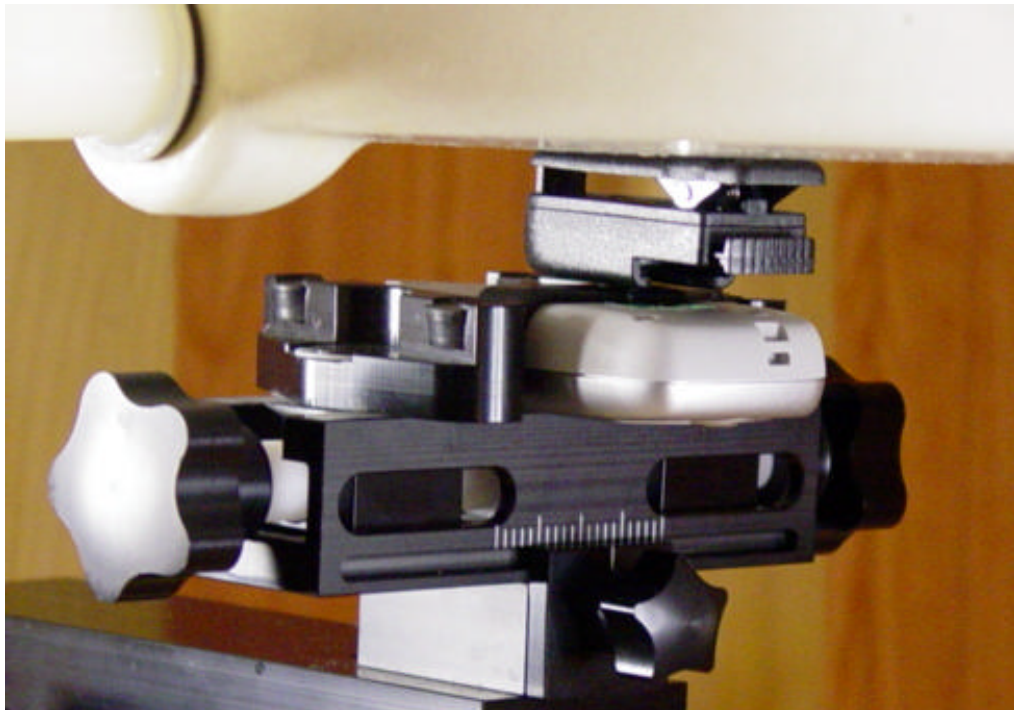


Figure 12.5 Body SAR Set-up (with phone clip)



Figure 10.6 Body SAR Set-up (with 25mm air separation)

Appendix A: Validation Test Plots

Please see separate attachment

Appendix B: SAR Distribution Plots

Please see separate attachment

Appendix C: Probe Calibration Parameters

Please see separate attachment

Appendix D: Dipole Calibration Parameters

Please see separate attachment