NOKIA

27-Jan-2003

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January 27th, 2003

Federal Communications Commission,
Authorization & Evaluation Division,
7435 Oakland Mills Road
Columbia, MD. 21046

Attention: Equipment Authorization Branch

We hereby certify that the transceiver FCC ID: OW3NEM-2 complies with ANSI/IEEE C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

Compliance was determined by testing appropriate parameters according to standard.

Nokia GmbH

Torsten Leickel
Product Program Manager, PCS Bochum (Germany)

• CERTIFICATION INFORMATION (SAR)

THIS MODEL PHONE MEETS THE GOVERNMENT'S REQUIREMENTS FOR EXPOSURE TO RADIO WAVES.

Your wireless phone is a radio transmitter and receiver. It is designed and manufactured not to exceed the emission limits for exposure to radio frequency (RF) energy set by the Federal Communications Commission of the U.S. Government. These limits are part of comprehensive guidelines and establish permitted levels of RF energy for the general population. The guidelines are based on standards that were developed by independent scientific organizations through periodic and thorough evaluation of scientific studies. The standards include a substantial safety margin designed to assure the safety of all persons, regardless of age and health.

The exposure standard for wireless mobile phones employs a unit of measurement known as the Specific Absorption Rate, or SAR. The SAR limit set by the FCC is 1.6W/kg.* Tests for SAR are conducted using standard operating positions accepted by the FCC with the phone transmitting at its highest certified power level in all tested frequency bands. Although the SAR is determined at the highest certified power level, the actual SAR level of the phone while operating can be well below the maximum value. This is because the phone is designed to operate at multiple power levels so as to use only the power required to reach the network. In general, the closer you are to a wireless base station antenna, the lower the power output.

Before a phone model is available for sale to the public, it must be tested and certified to the FCC that it does not exceed the limit established by the government-adopted requirement for safe exposure. The tests are performed in positions and locations (for example, at the ear and worn on the body) as required by the FCC for each model. The highest SAR value for this model phone as reported to the FCC when tested for use at the ear is 0.60 W/kg, and when worn on the body, as described in this user guide, is 0.87 W/kg. (Body-worn measurements differ among phone models, depending upon available accessories and FCC requirements).

While there may be differences between the SAR levels of various phones and at various positions, they all meet the government requirement.

The FCC has granted an Equipment Authorization for this model phone with all reported SAR levels evaluated as in compliance with the FCC RF exposure guidelines. SAR information on this model phone is on file with the FCC and can be found under the Display Grant section of **http://www.fcc.gov/oet/fccid** after searching on FCC ID **OWENEM-2**.

For body-worn operation, this phone has been tested and meets the FCC RF exposure guidelines for use with an enhancement that contains no metal and that positions the handset a minimum of 5/8 inch (1.5 cm) from the body. Use of other accessories may not ensure compliance with FCC RF exposure guidelines.

If you do not use a body-worn enhancement and are not holding the phone at the ear, position the handset a minimum of 5/8 inch (1.5 cm) from your body when the phone is switched on.

*In the United States and Canada, the SAR limit for mobile phones used by the public is 1.6 watts/kilogram (W/kg) averaged over one gram of tissue. The standard incorporates a substantial margin of safety to give additional protection for the public and to account for any variations in measurements. SAR values may vary depending on national reporting requirements and the network band. For SAR information in other regions please look under product information at **www.nokia.com**.

SAR Compliance Test Report

Test report no.:	02-RF-0195	**Date of report:**	17 February, 2003
Number of pages:	20	**Contact person:**	Nerina Walton
		Responsible test engineer:	Nerina Walton
Testing laboratory:	Test & Certification Center (TCC) Dallas Nokia Mobile Phones, Inc 6021 Connection Drive Irving TX 75039, USA Tel. +1 972 894 5000	**Client:**	Nokia Germany (GmbH) Product Creation Center Rensingstrasse 15 D-44807 Bochum Tel. +49 234 984 0

Tested devices: **OW3NEM-2, Model 3300b**
BLD-3, HDS-3h, HDB-4, LPS-4, MMC

Supplement reports: -

Testing has been carried out in accordance with:
IEEE Std 1528-200X, Draft CBD 1.0 – April 4, 2002
Draft Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques
FCC Supplement C Edition, 01-01
Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields

Documentation: The documentation of the testing performed on the tested devices is archived for 15 years at Test & Certification Center (TCC) Dallas

Test results: **The tested device complies with the requirements in respect of all parameters subject to the test.**

The test results and statements relate only to the items tested. The test report shall not be reproduced except in full, without written approval of the laboratory.

Date and signatures: 17 February, 2003

For the contents:

Alan C. Ewing
TCC Line Manager

Nerina Walton
Test Engineer

CONTENTS

1. QUALITY SYSTEM

The quality system in place for TCC-Dallas conforms to ISO/IEC 17025 and has been audited to the standard by A2LA (American Association of Laboratory Accreditation). Appendix D of this report contains the scope of accreditation for A2LA. TCC – Dallas has also been audited using the ISO 9000 Quality System, as part of Nokia Mobile Phones, Inc., by ABS (American Bureau of Shipping) Quality Evaluations Inc.

TCC-Dallas is a recognized laboratory with the Federal Communications Commission in filing applications for Certification under Parts 15 and 18, Registration Number 100060, and Industry Canada, Registration Number IC 661.

2. SUMMARY FOR SAR TEST REPORT

Date of test	18-23 January 2003
Contact person	Nerina Walton
Test plan referred to	-
FCC ID	OW3NEM-2
SN, HW, SW and Type of tested device	IMEI: 10004000884487, HW: Proto 3.0, SW: 1.72, Type: NEM-2
Accessories used in testing	BLD-3 Battery, HDS-3h Stereo Headset, HDB-4 Headset, LPS-4 (Loopset), MMC
Notes	-
Document code	02-RF-0195
Responsible test engineer	Nerina Walton
Measurement performed by	Elizabeth Parish

2.1 Maximum Results Found during SAR Evaluation

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

2.1.1 Head Configuration

Mode	Ch / *f* (MHz)	EDRP (dBm) [1]	Position	Limit (mW/g)	Measured (mW/g)	Result
GSM 850	251 / 848.80	29.4	Right Touch	1.6	0.60	**PASSED**

Mode	Ch / *f* (MHz)	EIRP (dBm) [1]	Position	Limit (mW/g)	Measured (mW/g)	Result
GSM 1900	661 / 1880.00	28.7	Left Tilt	1.6	0.32	**PASSED**

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

2.1.2 Body Worn Configuration

Mode	Ch / *f* (MHz)	EDRP (dBm) [1]	Position	Limit (mW/g)	Measured (mW/g)	Result
GSM 850	251 / 848.80	29.4	Back of Phone with LPS-4	1.6	0.87	**PASSED**

Mode	Ch / *f* (MHz)	EIRP (dBm) [1]	Position	Limit (mW/g)	Measured (mW/g)	Result
GSM 1900	661 / 1880.00	28.7	Back of Phone with HDB-4	1.6	0.45	**PASSED**

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

2.1.3 Measurement Uncertainty

Combined Standard Uncertainty	**± 13.6%**
Expanded Standard Uncertainty (k=2)	**± 27.1%**

3. DESCRIPTION OF TESTED DEVICE

Device category	Portable device			
Exposure environment	Uncontrolled exposure			
Unit type	Prototype unit			
Case type	Fixed case			
Mode of Operation	GSM 850	GPRS	GSM 1900	GPRS
Modulation Mode	Gaussian Minimum Shift Keying (GMSK)		Gaussian Minimum Shift Keying (GMSK)	
Duty Cycle	1/8		1/8	
Transmitter Frequency Range (MHz)	824.20 – 848.80		1850.20 – 1909.80	

3.1 Picture of Phone

The tested device, OW3NEM-2 is shown below: -

3.2 Description of the Antenna

Type	Internal Integrated Antenna
Location	Inside Back Cover, Near Top of the Device

3.3 Battery Options

There is only one battery currently available for the tested device, a rechargeable Li-ion battery, BLD-3.

3.4 Body Worn Operation

Body SAR was evaluated with a minimum separation distance of 15mm with the HDS-3h and HDB-4 headsets and then the LPS-4 loopset connected.

4. TEST CONDITIONS

4.1 Ambient Conditions

Ambient temperature (°C)	22±2
Tissue simulating liquid temperature (°C)	20±2
Humidity (%)	47

4.2 RF characteristics of the test site

Tests were performed in a fully enclosed RF shielded environment.

4.3 Test Signal, Frequencies, and Output Power

The device was controlled by using a radio tester. Communication between the device and the tester was established by air link.

Measurements were performed on the lowest, middle and highest channels of the operating band.

The phone was set to maximum power level during all tests and at the beginning of each test the battery was fully charged.

The DASY3 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.

5. DESCRIPTION OF THE TEST EQUIPMENT

The measurements were performed with an automated near-field scanning system, DASY3, manufactured by Schmid & Partner Engineering AG (SPEAG) in Switzerland.

Test Equipment	Model	NMP #	Serial Number	Due Date
DASY3, Data Acquisition	DAE V1	2292	389	07/03
E-field Probe	ET3DV6	2954	1504	07/03
Dipole Validation Kit	D835V2	3453	455	07/03
Dipole Validation Kit	D900V2	N/A	025	10/03
Dipole Validation Kit	D1900V2	3457	5D004	07/03

E-field probe and dipole validation kit calibration records are presented in Appendix D.

Additional equipment (required for validation).

Test Equipment	Model	NMP #	Serial Number	Due Date
Signal Generator	HP 8648C	0409	3836A04346	06/03
Amplifier	AR 5S1G4	0188	25583	-
Coupler	AR DC7144	2057	25304	-
Power Meter	Boonton 4232A	2996	64701	05/03
Power Sensor	Boonton 51015	2997	32187	05/03
Power Sensor	Boonton 51015	2998	32188	05/03
Thermometer	Omega CL27	3391	T-228450	03/03
Network Analyzer	HP 8720D	0455	US38431353	06/03
Dielectric Probe Kit	Agilent 85070C	3089	US99360172	-

The calibration interval on all items listed above can be obtained from the Engineering Services Group within NMP, Product Creation - Dallas. Where relevant, measuring equipment is subjected to in-service checks between testing. TCC - Dallas shall notify clients promptly, in writing, of identification of defective measuring equipment that casts doubt on the validity of results given in this report.

5.1 System Accuracy Verification

The manufacturer calibrates the probes annually. Dielectric parameters of the simulating liquids are measured using an Agilent 85070C dielectric probe kit and an HP 8720D network analyzer.

SAR measurements of the tested device were performed within 24 hours of system accuracy verification, which was done using the dipole validation kit.

The dipole antenna, which is manufactured by Schmid & Partner Engineering AG, is matched to be used near a flat phantom filled with tissue simulating solution. Length of the 835MHz dipole is 161mm with an overall height of 330mm; length of the 900MHz dipole is 149mm with an overall height of 330mm; length of the 1900MHz dipole is 68mm with an overall height of 300mm. A specific distance holder is used in the positioning to ensure correct spacing between the phantom and the dipole.

A power level of 250 mW was supplied to the dipole antenna placed under the flat section of the SAR phantom. Validation results are in the table below and a print out of the validation tests are presented in Appendix B. All the measured parameters were within specification.

5.1.1 Head Tissue

Tissue	*f* (MHz)	Description (Date Measured)	SAR (W/kg), 1g	Dielectric Parameters		Temp (°C)
				ε_r	σ (S/m)	
Head	900	22-Jan-03	11.9	40.8	1.01	20.5
		23-Jan-03	11.4	40.3	1.00	20.1
		Reference Result	11.4	41.5	0.97	N/A
Head	1900	19-Jan-03	43.2	40.5	1.46	19.5
		20-Jan-03	43.2	40.2	1.46	19.5
		Reference Result	44.0	39.8	1.46	N/A

5.1.2 Muscle Tissue

Tissue	*f* (MHz)	Description (Date Measured)	SAR (W/kg), 1g	Dielectric Parameters		Temp (°C)
				ε_r	σ (S/m)	
Muscle	835	18-Jan-03	10.6	54.4	0.93	18.6
		Reference Result	10.1	55.3	0.95	N/A
Muscle	1900	21-Jan-03	44.0	52.7	1.60	19.2
		Reference Result	44.0	54.4	1.57	N/A

5.2 Tissue Simulants

All dielectric parameters of tissue simulants were measured within 24 hours of SAR measurements. The depth of the tissue simulant in the ear reference point of the phantom was 15cm ± 5mm during all tests. Volume for each tissue simulant was 26 litres.

5.2.1 Head Tissue Simulant

The composition of the brain tissue simulating liquid for 835 MHz is: -

51.07% De-Ionized Water
47.31% Sugar
1.15% Salt
0.23% HEC
0.24% Bactericide

f **(MHz)**	**Description (Date Measured)**	**Dielectric Parameters**		**Temp (°C)**
		ε_r	σ (S/m)	
836.52	22-Jan-03	41.5	0.95	20.5
	23-Jan-03	41.0	0.94	20.1
	Recommended Values	41.5	0.90	N/A

The composition of the brain tissue simulating liquid for 1900 MHz is: -

44.91% 2-(2-butoxyethoxy) Ethanol
54.88% De-Ionized Water
0.21% Salt

f **(MHz)**	**Description (Date Measured)**	**Dielectric Parameters**		**Temp (°C)**
		ε_r	σ (S/m)	
1880	19-Jan-03	40.6	1.44	19.5
	20-Jan-03	40.3	1.44	19.5
	Recommended Values	40.0	1.40	N/A

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

5.2.2 Muscle Tissue Simulant

The composition of the muscle tissue simulating liquid for 835 MHz is: -

65.45% De-Ionized Water
34.31% Sugar
0.62% Salt
0.10% Bactericide

f **(MHz)**	**Description (Date Measured)**	**Dielectric Parameters**		**Temp (°C)**
		ε_r	σ **(S/m)**	
836.52	18-Jan-03	54.4	0.93	18.6
	Recommended Values	55.2	0.97	N/A

The composition of the muscle tissue simulating liquid for 1900 MHz is: -

69.02% De-Ionized Water
30.76% Diethylene Glycol Monobutyl Ether
0.22% Salt

f **(MHz)**	**Description (Date Measured)**	**Dielectric Parameters**		**Temp (°C)**
		ε_r	σ **(S/m)**	
1880	21-Jan-03	52.8	1.58	19.2
	Recommended Values	53.3	1.52	N/A

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

5.3 Phantoms

"SAM v4.0" phantom", manufactured by SPEAG, was used during the measurement. It has a fiberglass shell integrated into a wooden table. The shape of the shell corresponds to the phantom defined by SCC34-SC2. 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 2 mm except for the ear, where an integrated ear spacer provides a 6 mm spacing from the tissue boundary. Manufacturer reports tolerance in shell thickness to be ±0.1mm.

5.4 Isotropic E-Field Probe ET3DV6

Construction	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 ether)
Calibration	Calibration certificate in Appendix D
Frequency	10 MHz to 3 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Optical Surface Detection	± 0.2 mm repeatability in air and clear liquids over diffuse reflecting surfaces
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.4 dB in HSL (rotation normal to probe axis)
Dynamic Range	5 µW/g to > 100 mW/g; Linearity: ± 0.2 dB
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 dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms

6. DESCRIPTION OF THE TEST PROCEDURE

6.1 Test Positions

The device was placed into a holder using a special positioning tool, which aligns the bottom of the device with the holder and ensures that holder contacts only to the sides of the device. After positioning is done, tool is removed. This method provides standard positioning and separation, and also ensures free space for antenna.

Device holder was provided by SPEAG together with DASY3.

6.1.1 Against Phantom Head

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

The device was positioned 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 Draft Standard P1528-2001 “Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques”

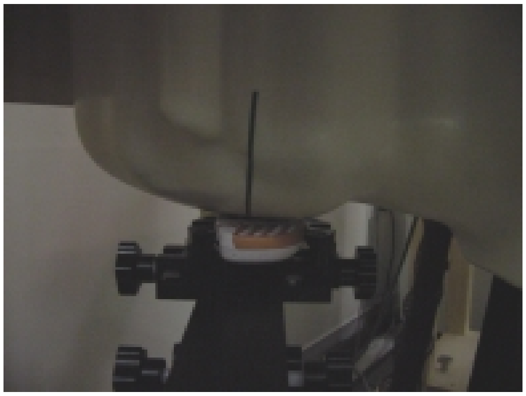
6.1.1.1 Initial Ear Position

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

6.1.1.2 Touch 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.

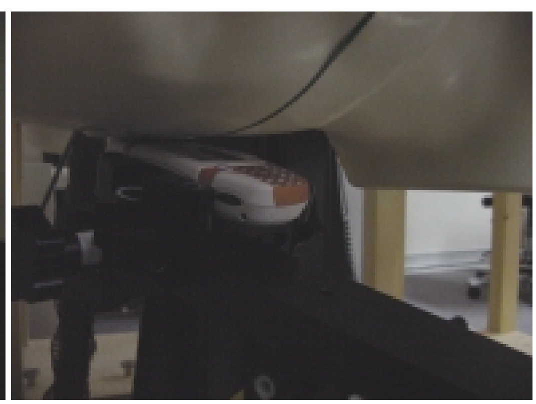
The following pictures show the tested device in the right touch position:




6.1.1.3 Tilt Position

In the "Touch 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 "touch 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 2-3 cm. 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 points" 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.

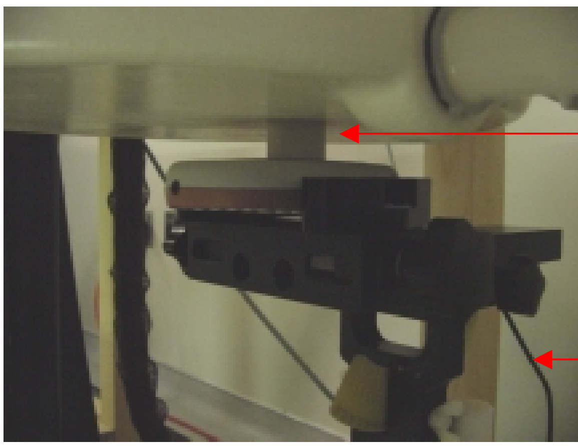
The following picture shows the tested device in the right tilt position:

6.1.2 Body Worn Configuration

Body SAR measurements were performed with the antenna facing towards the flat part of the phantom, with a separation distance of 15mm. Measurements were performed with the HDS-3h Stereo Headset connected, then were repeated for the HDB-4 Headset and the LPS-4 Loopset.

The following picture shows the tested device in the body test position: -



15mm Spacer

HDS-3h (Stereo Headset)

Note: the 15mm spacer was removed during the SAR measurement.

6.2 Scan Procedures

First coarse scans are used for quick determination of the field distribution. Next a cube scan, 5x5x7 points; spacing between each point 8x8x5 mm, is performed around the highest E-field value to determine the averaged SAR-distribution over 1g.

6.3 SAR Averaging Methods

The maximum SAR value is averaged 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 30 mm 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.

7. MEASUREMENT UNCERTAINTY

7.1 Description of Individual Measurement Uncertainty

7.1.1 Assessment Uncertainty

Uncertainty description	Uncert. value %	Probability distribution	Div.	c_i	Stand. uncert (1g) %	v_i or v_{eff}
Measurement System						
Probe calibration	± 4.4	normal	1	1	± 4.4	∞
Axial isotropy of the probe	± 4.7	rectangular	√3	$(1-c_p)^{1/2}$	± 1.9	∞
Sph. Isotropy of the probe	± 9.6	rectangular	√3	$(c_p)1^{/2}$	± 3.9	∞
Spatial resolution	± 0.0	rectangular	√3	1	± 0.0	∞
Boundary effects	± 5.5	rectangular	√3	1	± 3.2	∞
Probe linearity	± 4.7	rectangular	√3	1	± 2.7	∞
Detection limit	± 1.0	rectangular	√3	1	± 0.6	∞
Readout electronics	± 1.0	normal	1	1	± 1.0	∞
Response time	± 0.8	rectangular	√3	1	± 0.5	∞
Integration time	± 1.4	rectangular	√3	1	± 0.8	∞
RF ambient conditions	± 3.0	rectangular	√3	1	± 1.7	∞
Mech. constrains of robot	± 0.4	rectangular	√3	**1**	± 0.2	∞
Probe positioning	± 2.9	rectangular	√3	1	± 1.7	∞
Extrap. and integration	± 3.9	rectangular	√3	1	± 2.3	∞
Test Sample Related						
Device positioning	± 6.0	normal	0.89	1	± 6.7	12
Device holder uncertainty	± 5.0	normal	0.84	1	± 5.9	8
Power drift	± 5.0	rectangular	√3	1	± 2.9	∞
Phantom and Setup						
Phantom uncertainty	± 4.0	rectangular	√3	**1**	± 2.3	∞
Liquid conductivity (target)	± 5.0	rectangular	√3	**0.6**	± 1.7	∞
Liquid conductivity (meas.)	± 10.0	rectangular	√3	**0.6**	± 3.5	∞
Liquid permittivity (target)	± 5.0	rectangular	√3	**0.6**	± 1.7	∞
Liquid permittivity (meas.)	± 5.0	rectangular	√3	**0.6**	± 1.7	∞
Combined Standard Uncertainty					± 13.6	
Expanded Standard Uncertainty (k=2)					± 27.1	

8. RESULTS

Corresponding SAR distribution print outs of maximum results in every operating mode and position are shown in Appendix C; it also includes Z-plots of maximum measurement results in head and body worn configurations. The SAR distributions are substantially similar or equivalent to the plots submitted regardless of used channel in each mode and position, unless otherwise presented.

8.1 Head Configuration

SAR measurements were performed on the tested device with the MMC inserted and removed.

With MMC inserted: -

Mode	Channel/ *f* (MHz)	EDRP (dBm) [1]	SAR, averaged over 1g (mW/g)			
			Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
GSM 850	128 / 824.04	29.7	-	-	0.54	-
	190 / 836.60	29.5	0.50	0.36	0.54	0.35
	251 / 848.80	29.4	-	-	0.54	-

Mode	Channel/ *f* (MHz)	EIRP (dBm) [1]	SAR, averaged over 1g (mW/g)			
			Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
GSM 1900	512 / 1850.20	27.1	0.16	0.18	-	0.13
	661 / 1880.00	28.7	0.27	0.30	0.16	0.23
	810 / 1909.80	30.1	0.26	0.29	-	0.25

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

With MMC removed: -

Mode	Channel/ *f* (MHz)	EDRP (dBm) [1]	SAR, averaged over 1g (mW/g)			
			Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
GSM 850	128 / 824.04	29.7	-	-	0.55	-
	190 / 836.60	29.5	0.53	0.36	0.56	0.35
	251 / 848.80	29.4	-	-	0.60	-

Mode	Channel/ *f* (MHz)	EIRP (dBm) [1]	SAR, averaged over 1g (mW/g)			
			Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
GSM 1900	512 / 1850.20	27.1	-	-	-	-
	661 / 1880.00	28.7	0.27	0.30	0.16	0.23
	810 / 1909.80	30.1	-	-	-	-

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

8.2 Body Worn Configuration

Measurements were performed with the HDS-3h Stereo Headset connected, then were repeated for the HDB-4 Headset and the LPS-4 Loopset.

SAR measurements were performed on the tested device with the MMC inserted and removed.

With MMC inserted: -

Mode	Channel/ *f* (MHz)	EDRP (dBm) [1]	SAR, averaged over 1g (mW/g)		
			HDS-3h	HDB-4	LPS-4
GSM 850	128 / 824.04	29.7	0.76	0.72	0.78
	190 / 836.60	29.5	0.78	0.83	0.82
	251 / 848.80	29.4	0.76	0.83	0.80

Mode	Channel/ *f* (MHz)	EIRP (dBm) [1]	SAR, averaged over 1g (mW/g)		
			HDS-3h	HDB-4	LPS-4
GSM 1900	512 / 1850.20	27.1	-	-	-
	661 / 1880.00	28.7	0.44	0.45	0.40
	810 / 1909.80	30.1	-	-	-

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

With MMC removed: -

Mode	Channel/ *f* (MHz)	EDRP (dBm) [1]	SAR, averaged over 1g (mW/g)		
			HDS-3h	HDB-4	LPS-4
GSM 850	128 / 824.04	29.7	0.77	0.78	0.79
	190 / 836.60	29.5	0.75	0.79	0.83
	251 / 848.80	29.4	0.79	0.81	0.87

Mode	Channel/ *f* (MHz)	EIRP (dBm) [1]	SAR, averaged over 1g (mW/g)		
			HDS-3h	HDB-4	LPS-4
GSM 1900	512 / 1850.20	27.1	-	-	-
	661 / 1880.00	28.7	0.44	0.45	0.41
	810 / 1909.80	30.1	-	-	-

Note 1: An FCC accredited laboratory, TCC Dallas, performed the EDRP and EIRP measurements.

APPENDIX A: SCOPE OF ACCREDITATION FOR A2LA

TCC-Dallas is accredited by the American Association for Laboratory Accreditation (A2LA) as shown in the scope below:

THE AMERICAN ASSOCIATION FOR LABORATORY ACCREDITATION

ACCREDITED LABORATORY

A2LA has accredited

NOKIA MOBILE PHONES
Test & Certification Center - Dallas
Irving, TX

for technical competence in the field of

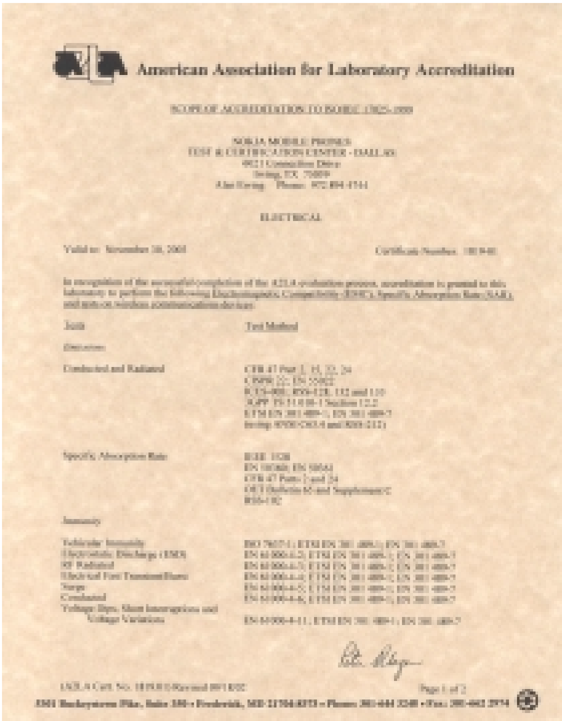
Electrical Testing

The accreditation covers the specific tests and types of tests listed on the agreed scope of accreditation. This laboratory meets the requirements of ISO/IEC 17025-1999 "General Requirements for the Competence of Testing and Calibration Laboratories" and any additional program requirements in the identified field of testing. Testing and calibration laboratories that comply with this International Standard also operate in accordance with ISO 9001 or ISO 9002.

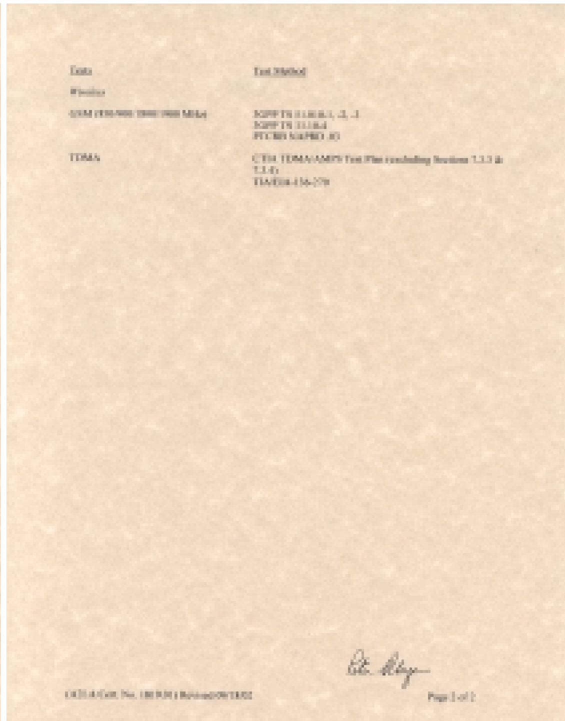
Presented this 1st day of October, 2001

President
For the Accreditation Council
Certificate Number 1819.01
Valid to November 30, 2003

For tests or types of tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.


American Association for Laboratory Accreditation

ELECTRICAL


TDMA

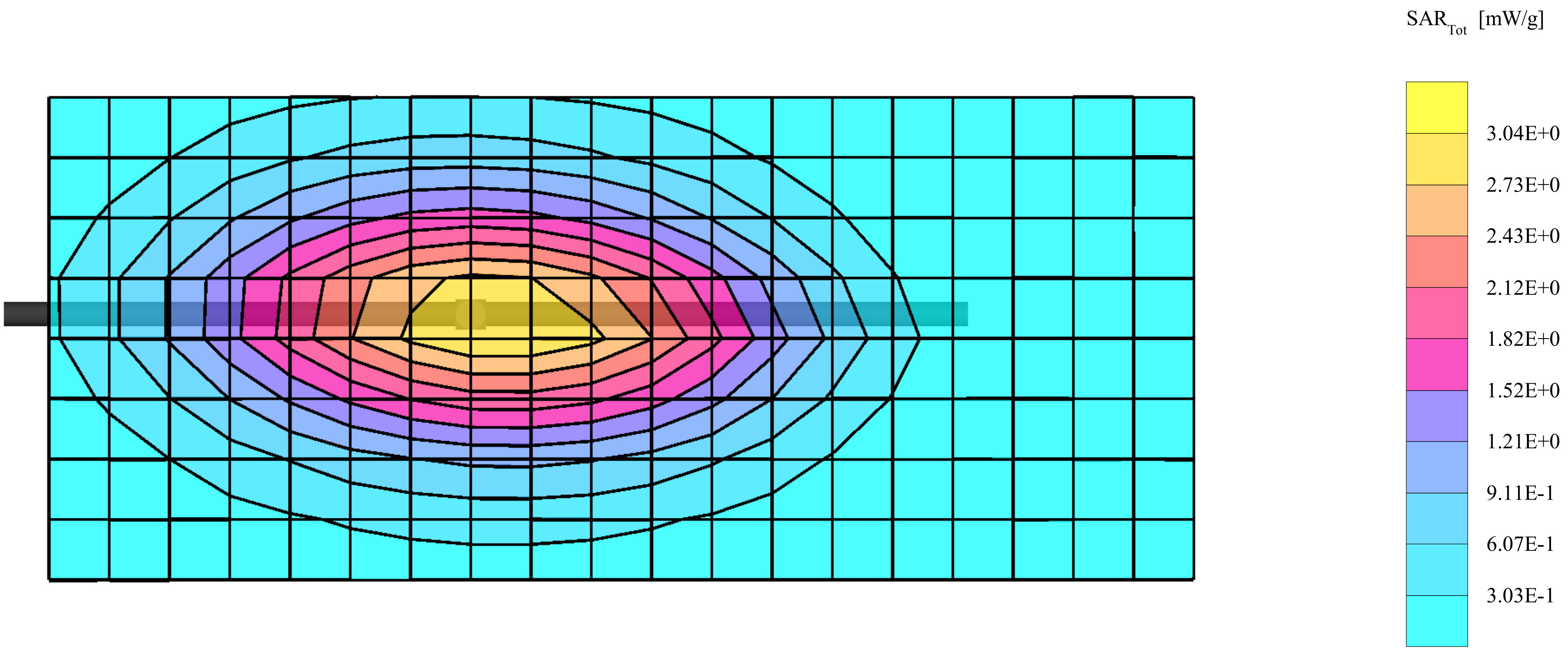
"This laboratory is accredited by the American Association for Laboratory Accreditation (A2LA) and the results shown in this report have been determined to be in accordance with the laboratory's terms of accreditation unless stated otherwise in the report."

Should this report contain any data for tests for which we are not accredited, such data would not be covered by this laboratory's A2LA accreditation.

APPENDIX B: VALIDATION TEST PRINTOUTS

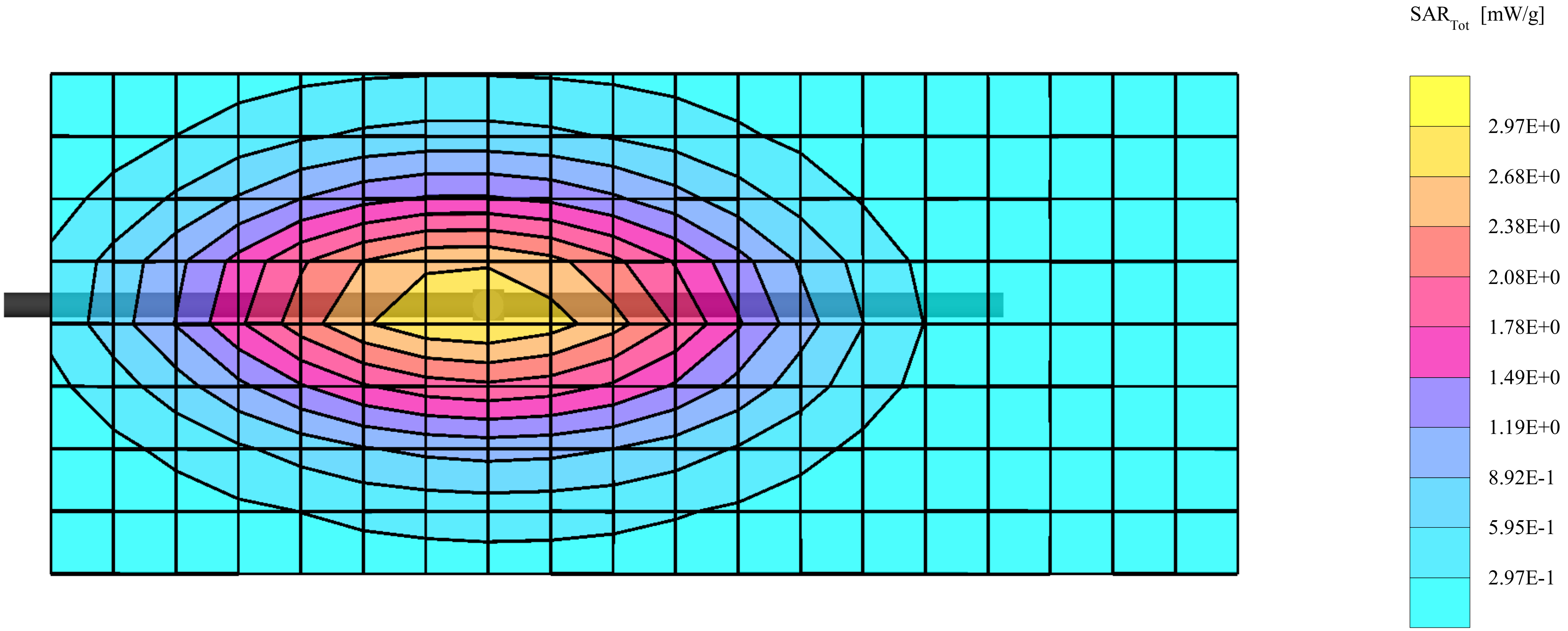
Dipole 900 MHz, Validation for Head Tissue

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 900 MHz; Crest factor: 1.0
Validation 900MHz - Brain Tissue: σ = 1.01 mho/m ε_r = 40.8 ρ = 1.00 g/cm³
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cubes (2): SAR (1g): 2.98 mW/g ± 0.07 dB, SAR (10g): 1.85 mW/g ± 0.07 dB, (Worst-case extrapolation)
Coarse: Dx = 10.0, Dy = 10.0, Dz = 10.0
Powerdrift: -0.01 dB
Liquid Temperature (°C): 20.5



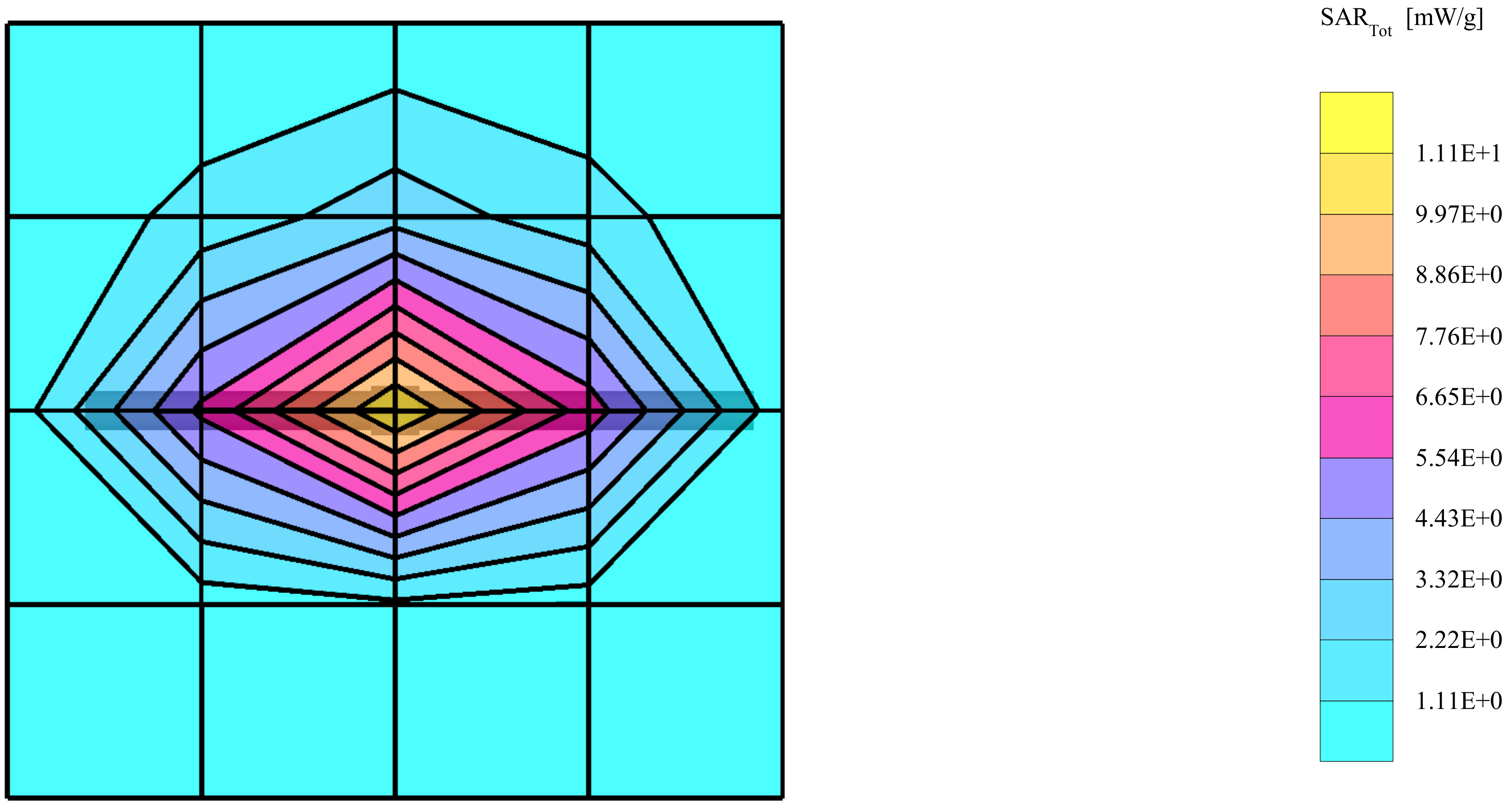
Dipole 900 MHz, Validation for Head Tissue

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 900 MHz; Crest factor: 1.0
Validation 900MHz - Brain Tissue: σ = 1.00 mho/m ε_r = 40.3 ρ = 1.00 g/cm³
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cubes (2): SAR (1g): 2.85 mW/g ± 0.06 dB, SAR (10g): 1.78 mW/g ± 0.06 dB, (Worst-case extrapolation)
Coarse: Dx = 10.0, Dy = 10.0, Dz = 10.0
Powerdrift: -0.05 dB
Liquid Temperature (°C): 20.1



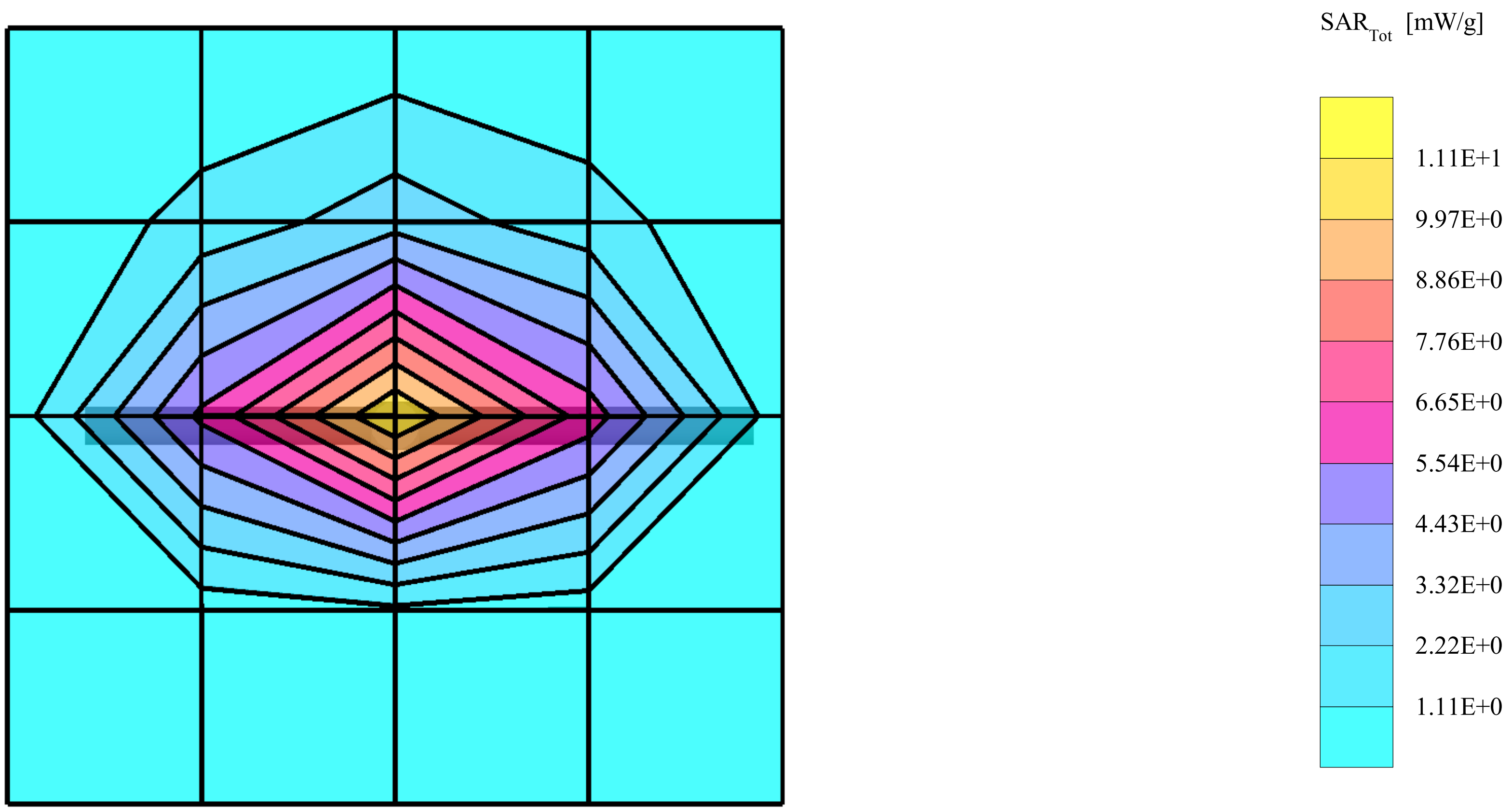
Dipole 1900 MHz, Validation for Head Tissue

SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1900 MHz; Crest factor: 1.0
PCS Band - Brain Tissue: σ = 1.46 mho/m ε_r = 40.5 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cubes (2): SAR (1g): 10.8 mW/g ± 0.08 dB, SAR (10g): 5.53 mW/g ± 0.04 dB, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.01 dB
Liquid Temperature (°C): 19.5



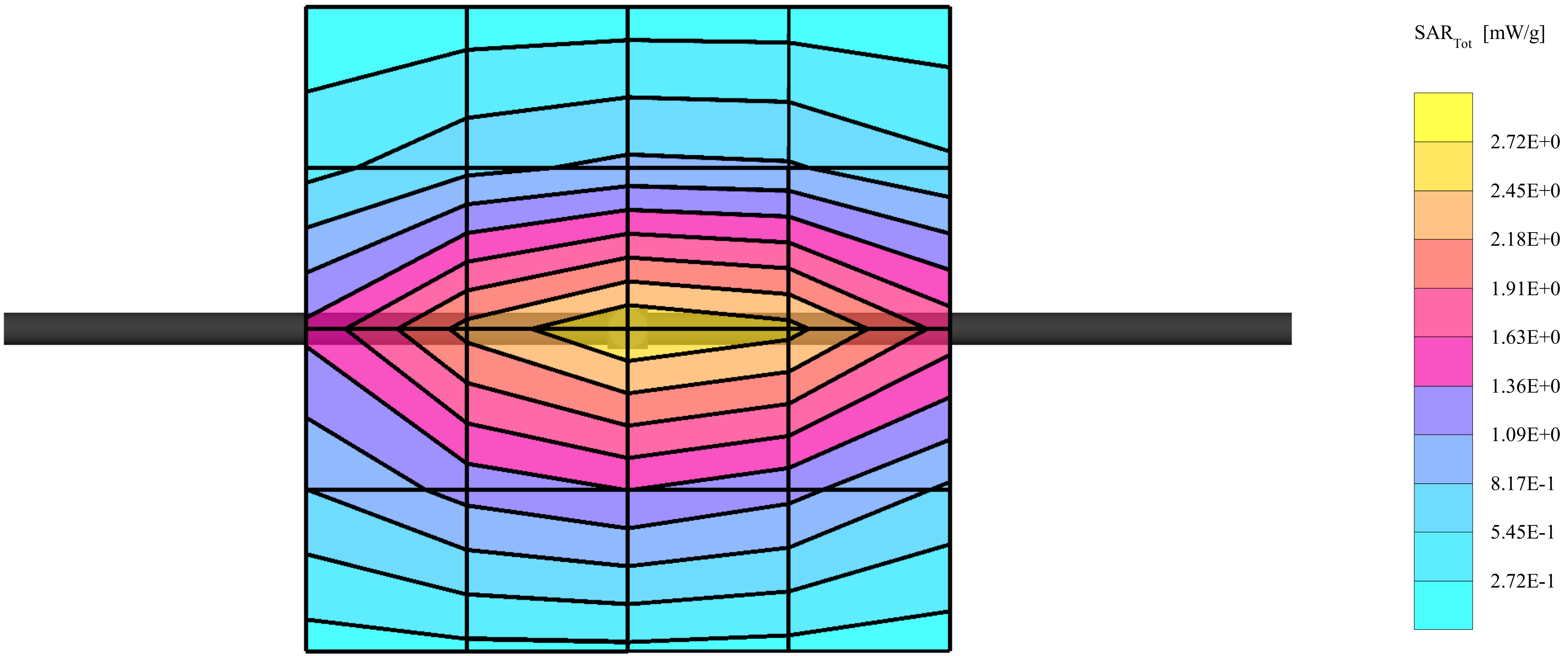
Dipole 1900 MHz, Validation for Head Tissue

SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1900 MHz; Crest factor: 1.0
PCS Band - Brain Tissue: σ = 1.46 mho/m ε_r = 40.2 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cubes (2): SAR (1g): 10.8 mW/g ± 0.08 dB, SAR (10g): 5.53 mW/g ± 0.04 dB, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.01 dB
Liquid Temperature (°C):19.5



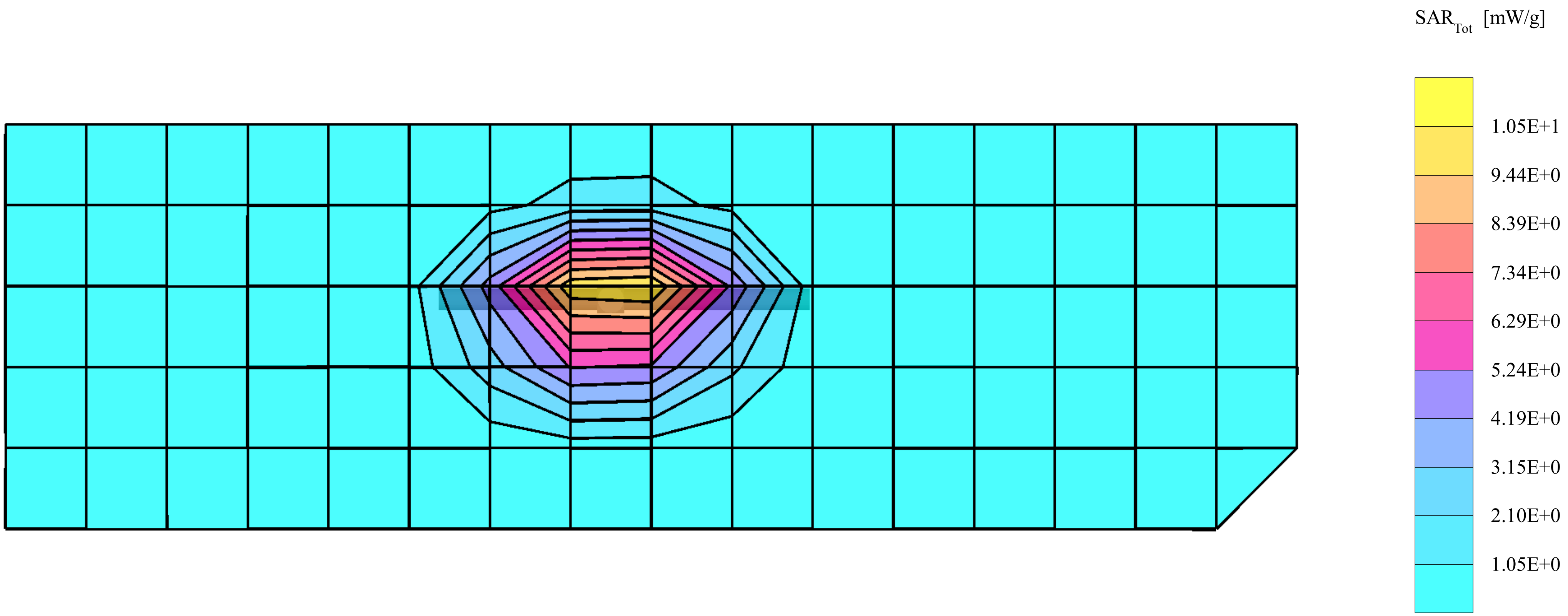
Dipole 835 MHz, Validation for Body Tissue

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 835 MHz; Crest factor: 1.0
Validation 835MHz - Muscle Tissue: σ = 0.93 mho/m ε_r = 54.4 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cubes (2): SAR (1g): 2.64 mW/g ± 0.05 dB, SAR (10g): 1.71 mW/g ± 0.05 dB, (Worst-case extrapolation)
Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0
Powerdrift: -0.07 dB
Liquid Temperature (°C): 18.6



Dipole 1900 MHz, Validation for Body Tissue

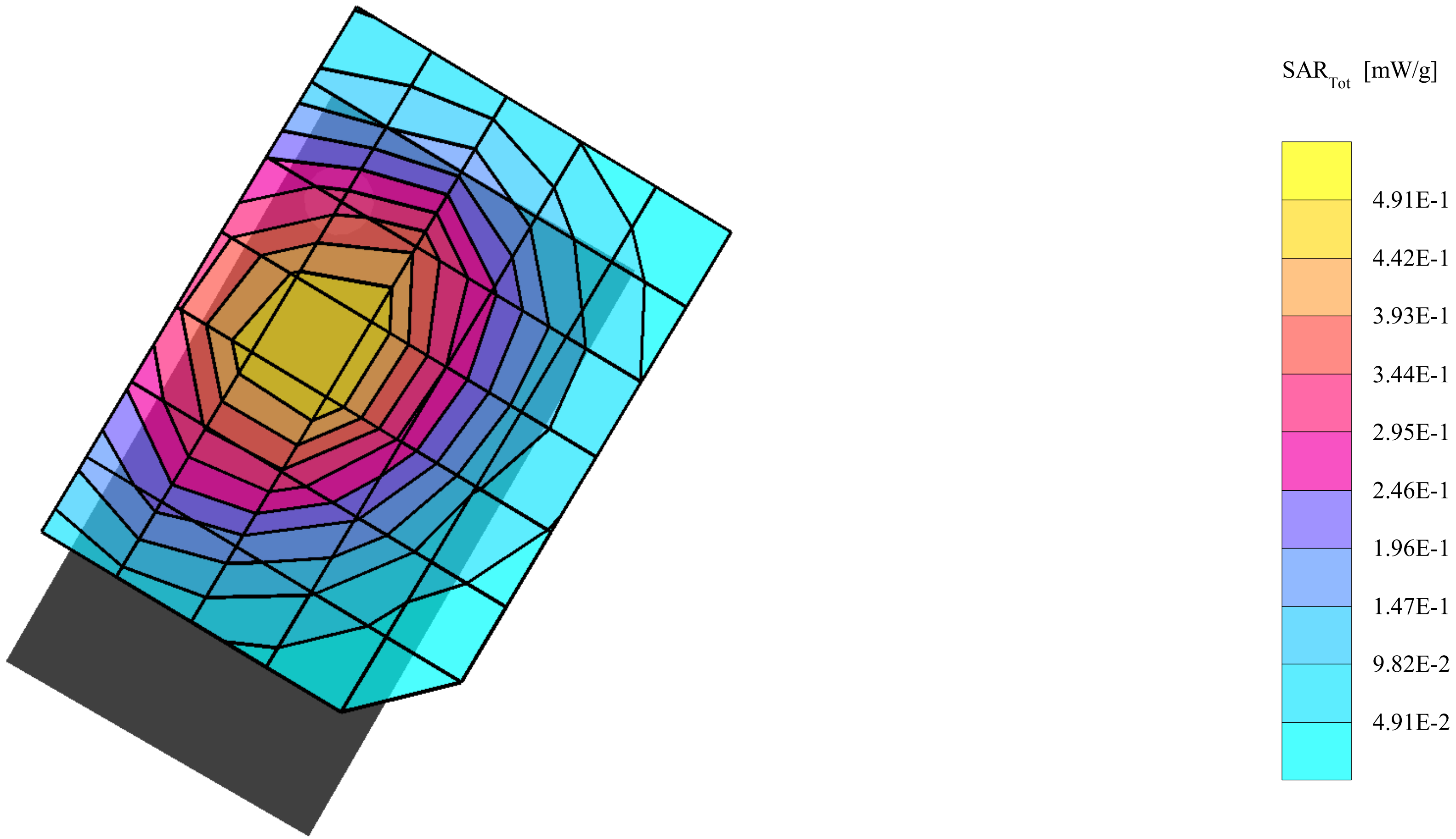
SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1900 MHz; Crest factor: 1.0
Validation 1900MHz - Muscle Tissue: σ = 1.60 mho/m ε_r = 52.7 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.00,5.00,5.00)
Cubes (2): SAR (1g): 11.0 mW/g ± 0.04 dB, SAR (10g): 5.64 mW/g ± 0.05 dB, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.01 dB
Liquid Temperature (°C): 19.2



APPENDIX C: SAR DISTRIBUTION PRINTOUTS

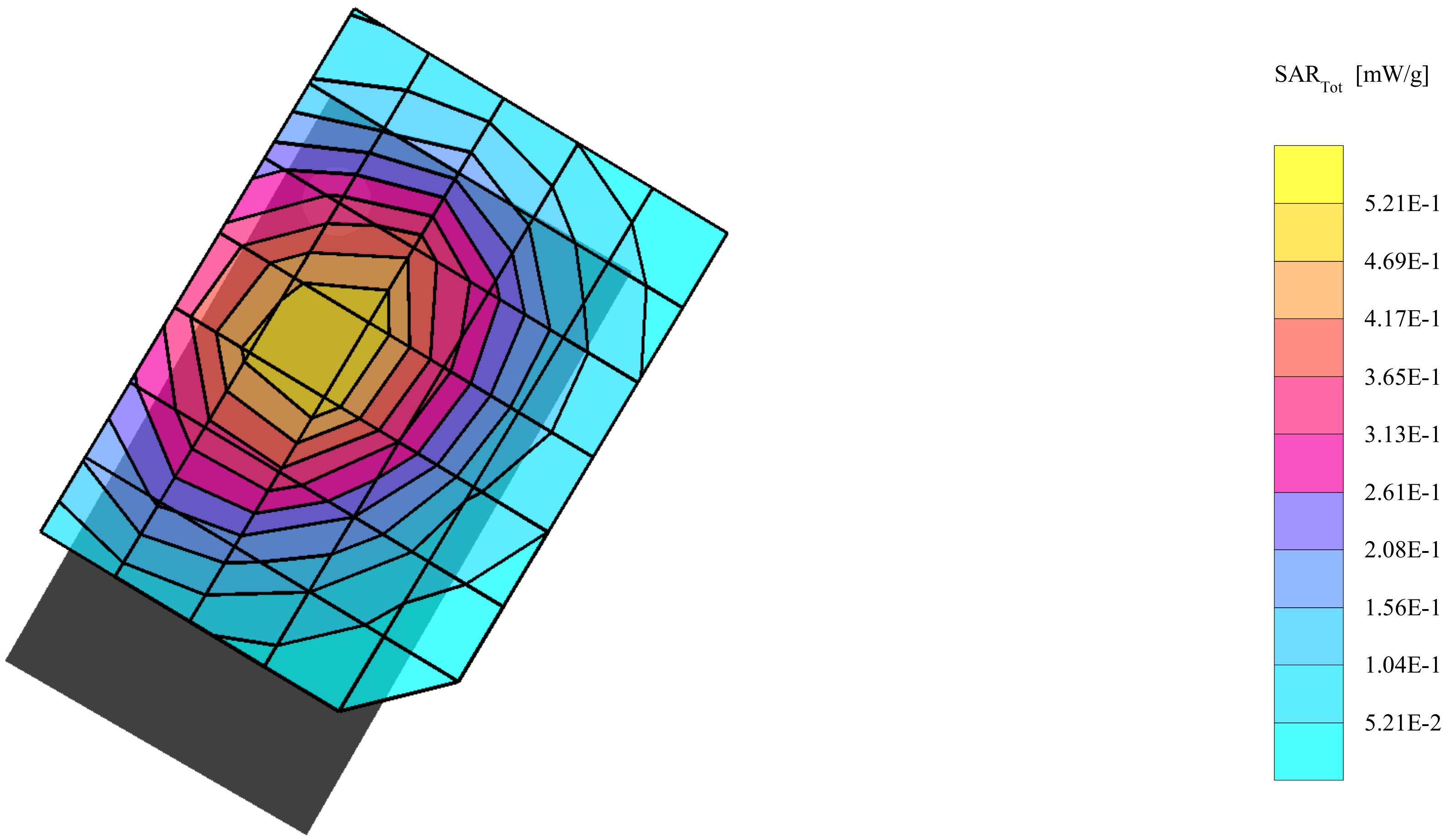
OW3NEM-2, GSM 850, Channel 190, Left Touch Position with MMC

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.95$ mho/m $\varepsilon_r = 41.5$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.504 mW/g, SAR (10g): 0.348 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.03 dB
Liquid Temperature (°C): 20.5



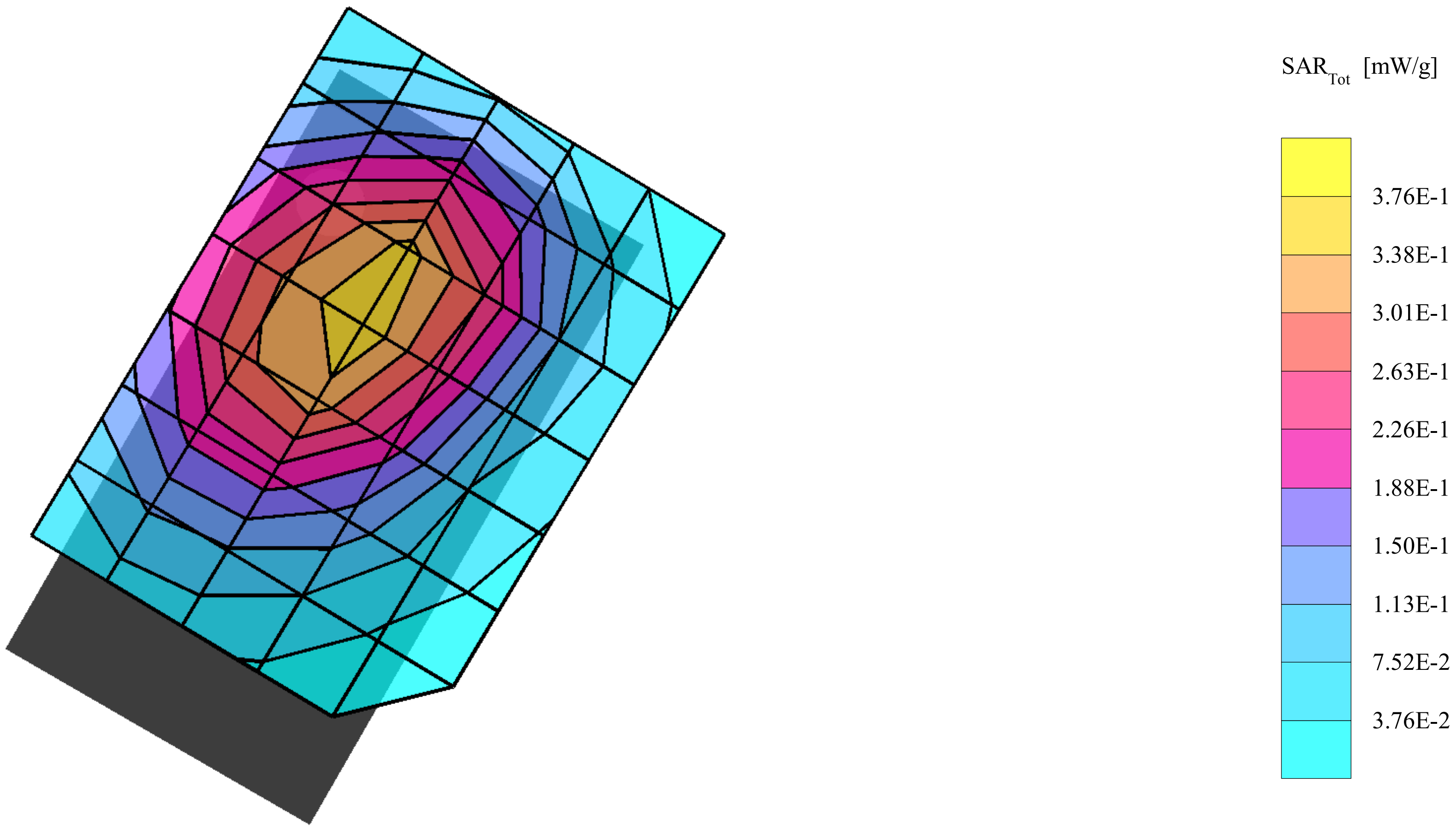
OW3NEM-2, GSM 850, Channel 190, Left Touch Position; MMC Removed

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: σ = 0.95 mho/m ε_r = 41.5 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.530 mW/g, SAR (10g): 0.365 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.20 dB
Liquid Temperature (°C): 20.5



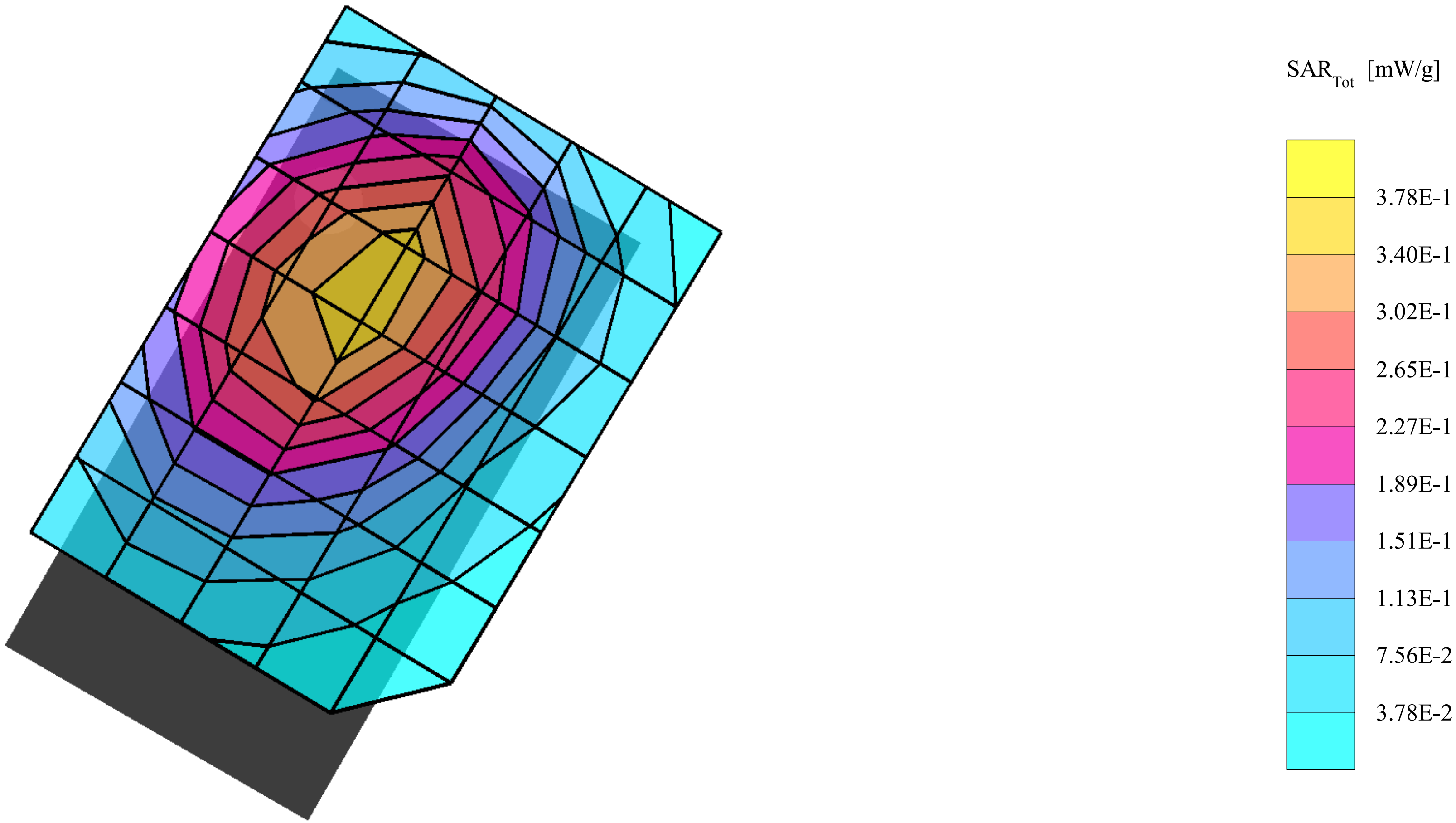
OW3NEM-2, GSM 850, Channel 190, Left Tilt Position with MMC

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.95$ mho/m $\varepsilon_r = 41.5$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.355 mW/g, SAR (10g): 0.245 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.13 dB
Liquid Temperature (°C): 20.5



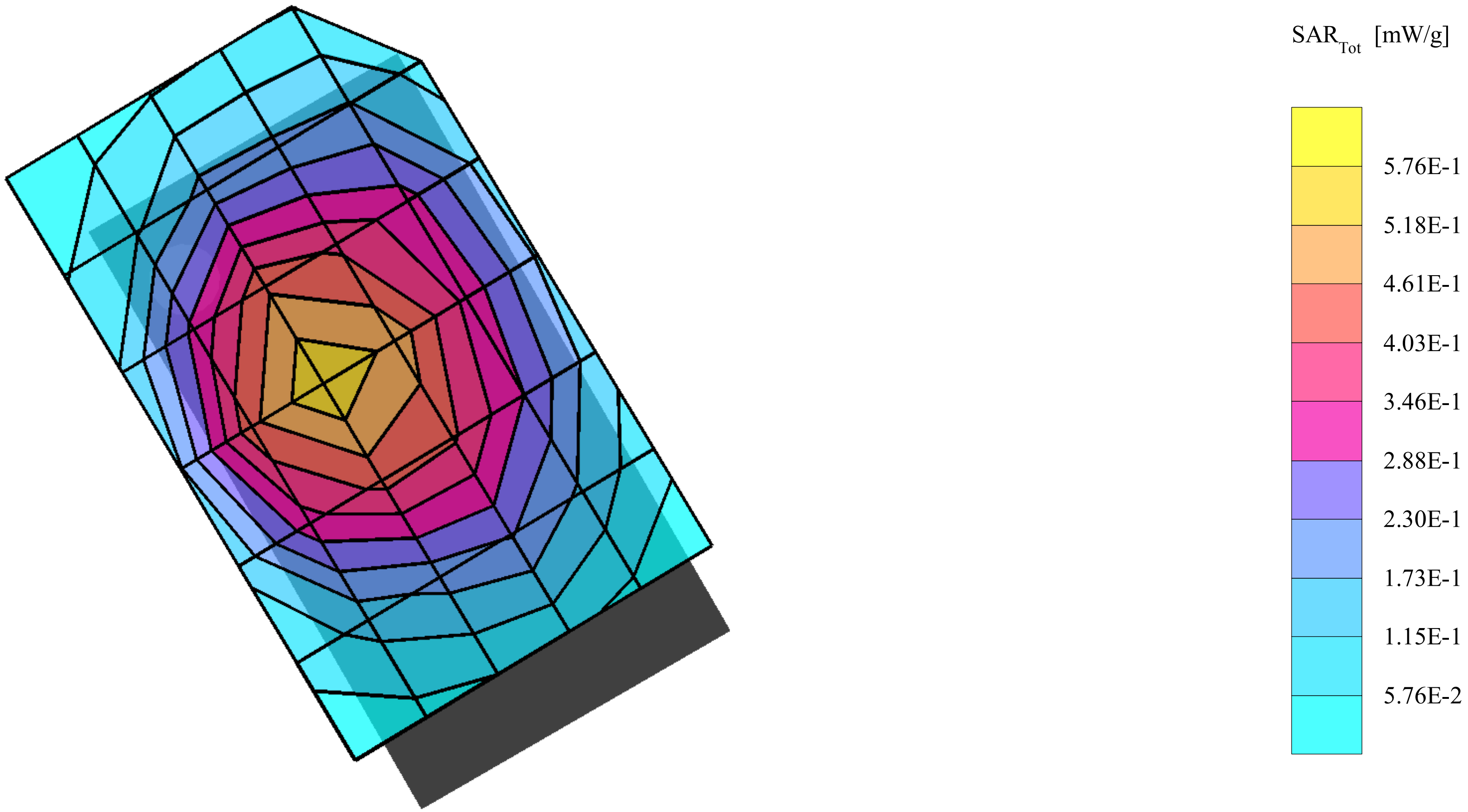
OW3NEM-2, GSM 850, Channel 190, Left Tilt Position; MMC Removed

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: σ = 0.95 mho/m ε_r = 41.5 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.360 mW/g, SAR (10g): 0.249 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.19 dB
Liquid Temperature (°C): 20.5



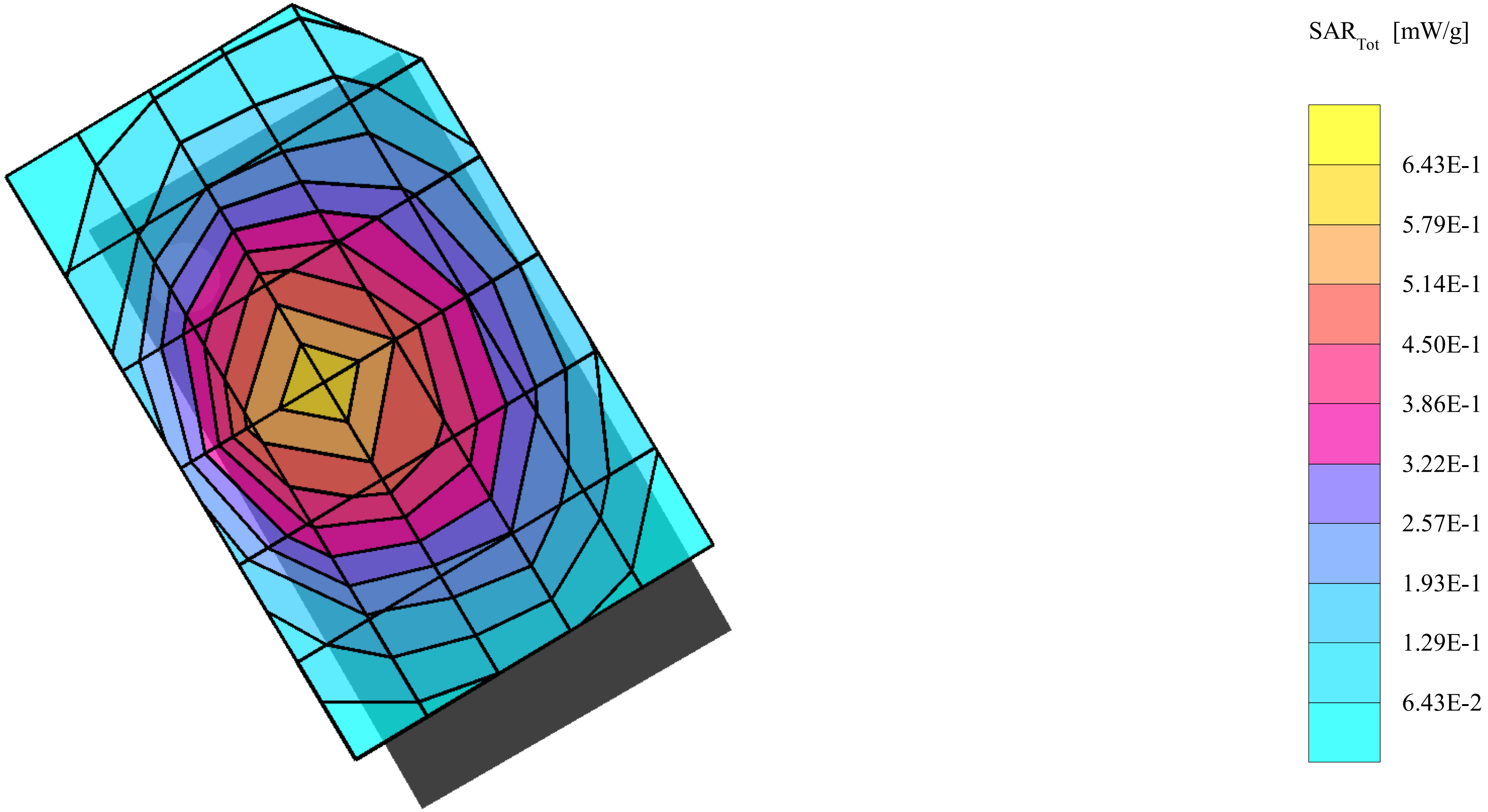
OW3NEM-2, GSM 850, Channel 190, Right Touch Position with MMC

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.95$ mho/m $\varepsilon_r = 41.5$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.544 mW/g, SAR (10g): 0.376 mW/g, (Worst-case extrapolation)
Coarse: Dx = 19.0, Dy = 14.0, Dz = 10.0
Powerdrift: -0.24 dB
Liquid Temperature (°C): 20.5



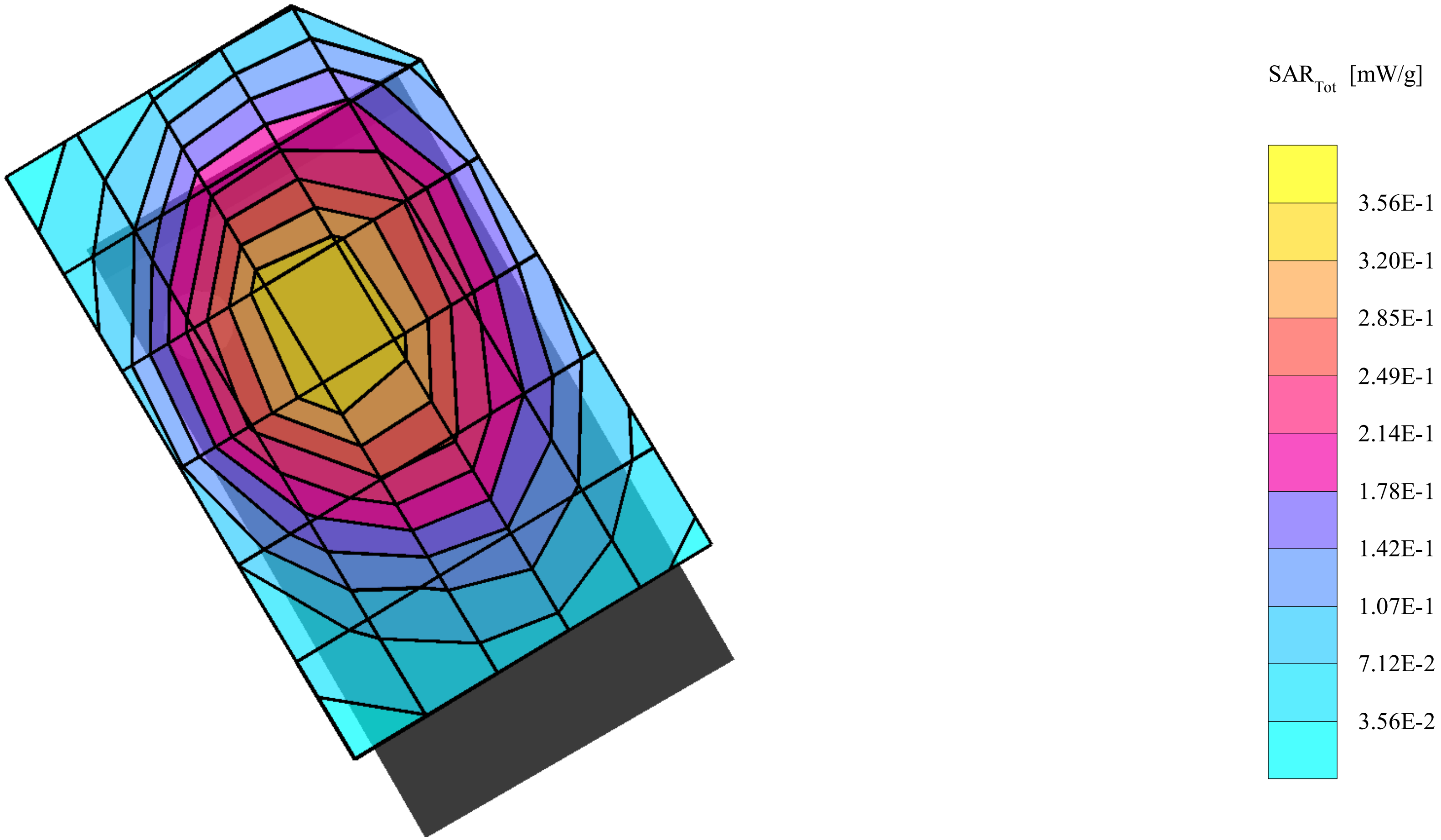
OW3NEM-2, GSM 850, Channel 251, Right Touch Position; MMC Removed

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.94$ mho/m $\varepsilon_r = 41.0$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.604 mW/g, SAR (10g): 0.415 mW/g, (Worst-case extrapolation)
Coarse: Dx = 19.0, Dy = 14.0, Dz = 10.0
Powerdrift: -0.24 dB
Liquid Temperature (°C): 20.1



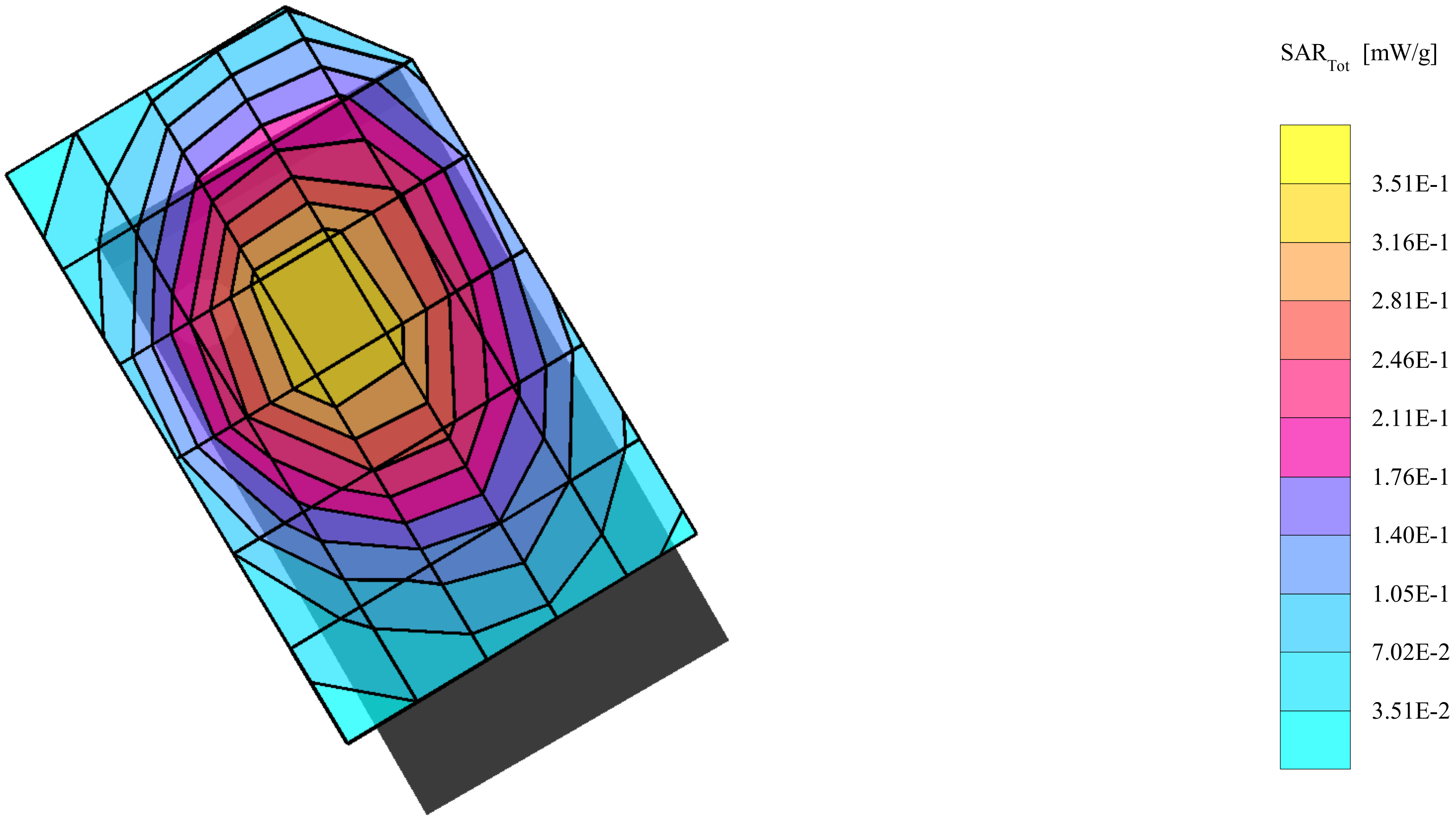
OW3NEM-2, GSM 850, Channel 190, Right Tilt Position with MMC

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.95$ mho/m $\varepsilon_r = 41.5$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.353 mW/g, SAR (10g): 0.250 mW/g, (Worst-case extrapolation)
Coarse: Dx = 19.0, Dy = 14.0, Dz = 10.0
Powerdrift: -0.23 dB
Liquid Temperature (°C): 20.5



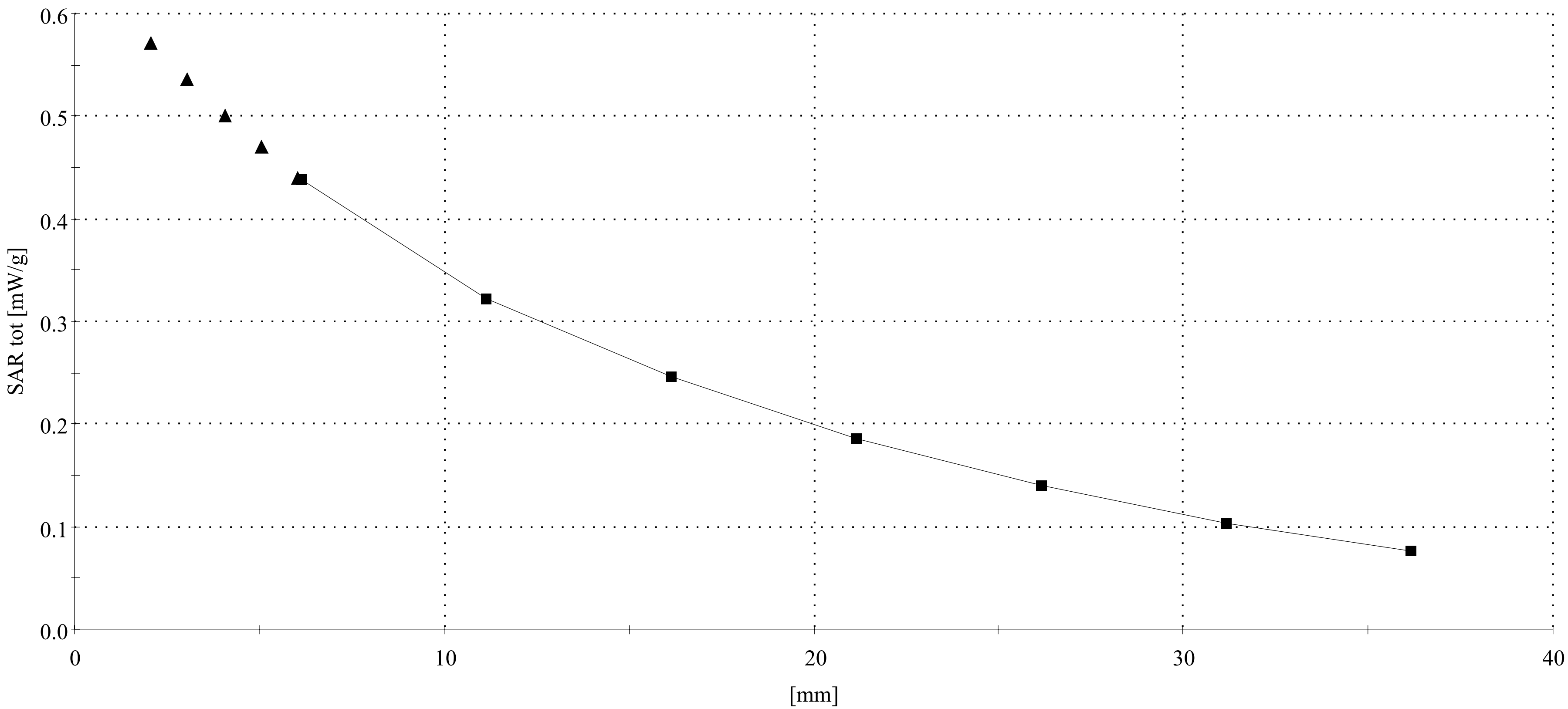
OW3NEM-2, GSM 850, Channel 190, Right Tilt Position; MMC Removed

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: $\sigma = 0.95$ mho/m $\varepsilon_r = 41.5$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.348 mW/g, SAR (10g): 0.247 mW/g, (Worst-case extrapolation)
Coarse: Dx = 19.0, Dy = 14.0, Dz = 10.0
Powerdrift: -0.11 dB
Liquid Temperature (°C): 20.5



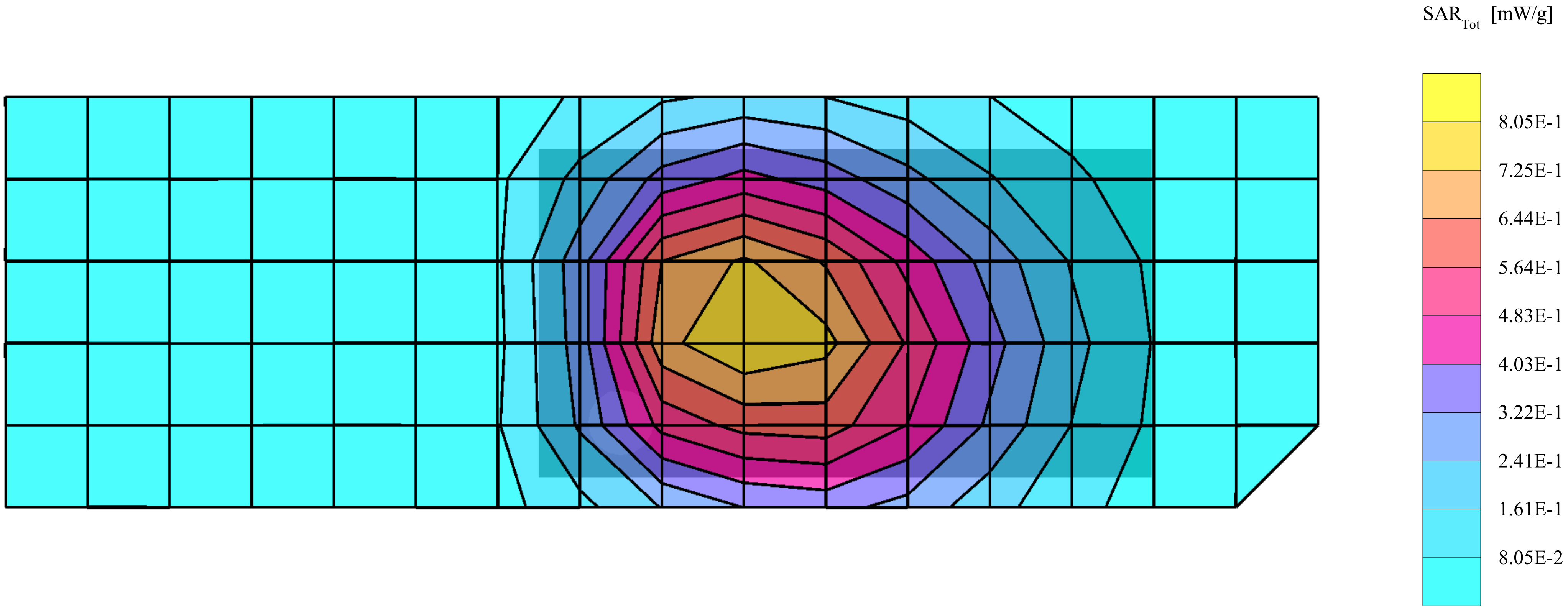
OW3NEM-2, GSM 850, Channel 251, Right Touch Position; MMC Removed

SAM 1 (Cellular - Brain Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Brain Tissue: σ = 0.94 mho/m ε_r = 41.0 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.604 mW/g, SAR (10g): 0.415 mW/g, (Worst-case extrapolation)
Cube 5x5x7: Dx = 8.0, Dy = 8.0, Dz = 5.0
Liquid Temperature (°C): 20.1



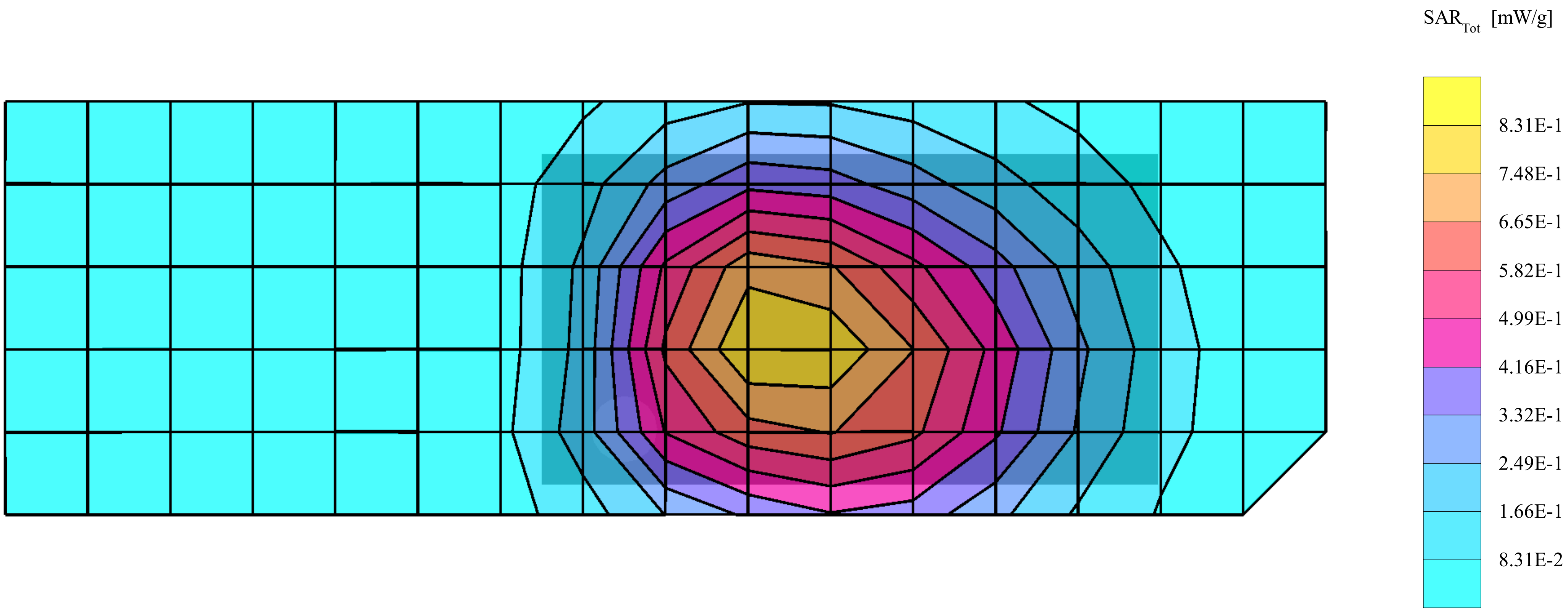
OW3NEM-2, GSM 850, Channel 190, Back of Phone with 15mm Spacer and HDS-3h Headset; MMC

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: $\sigma = 0.93$ mho/m $\varepsilon_r = 54.4$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.782 mW/g, SAR (10g): 0.552 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.16 dB
Liquid Temperature (°C): 18.6



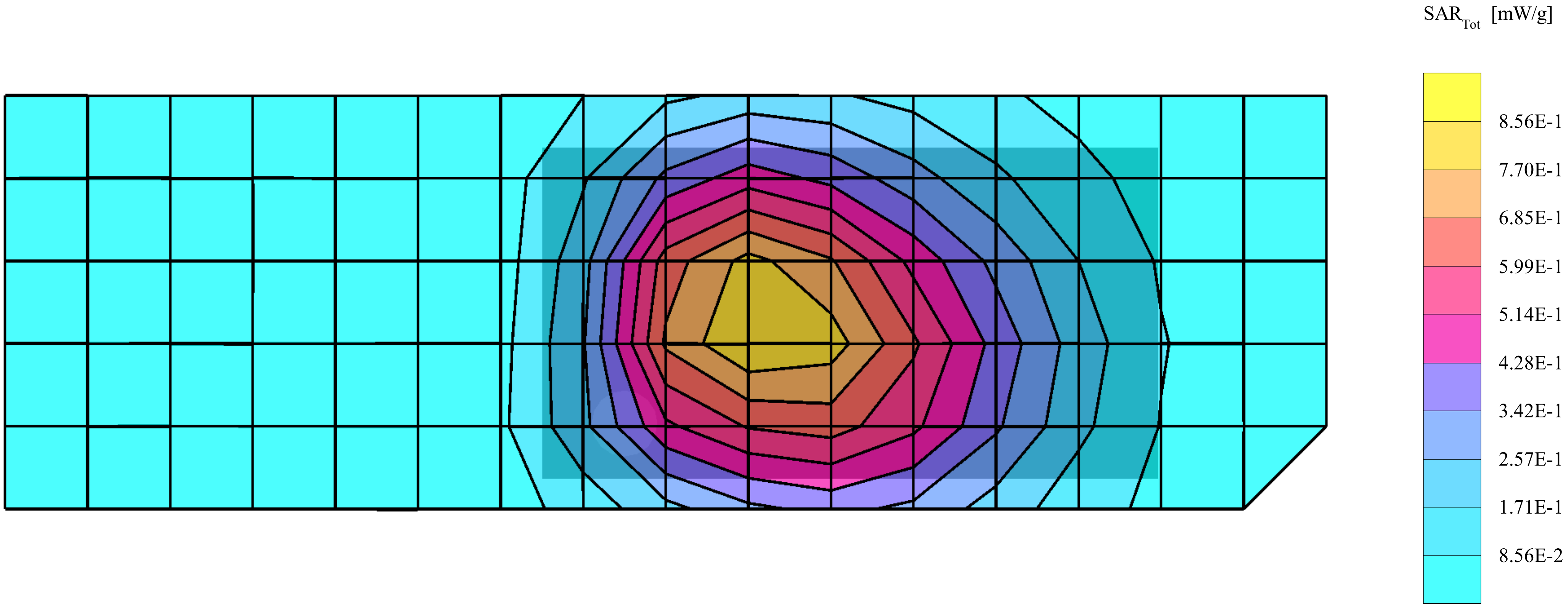
OW3NEM-2, GSM 850, Channel 251, Back of Phone with 15mm Spacer and HDS-3h Headset; MMC Removed

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: σ = 0.93 mho/m ε_r = 54.4 ρ = 1.00 g/cm³
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.790 mW/g, SAR (10g): 0.562 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.17 dB
Liquid Temperature (°C): 18.6



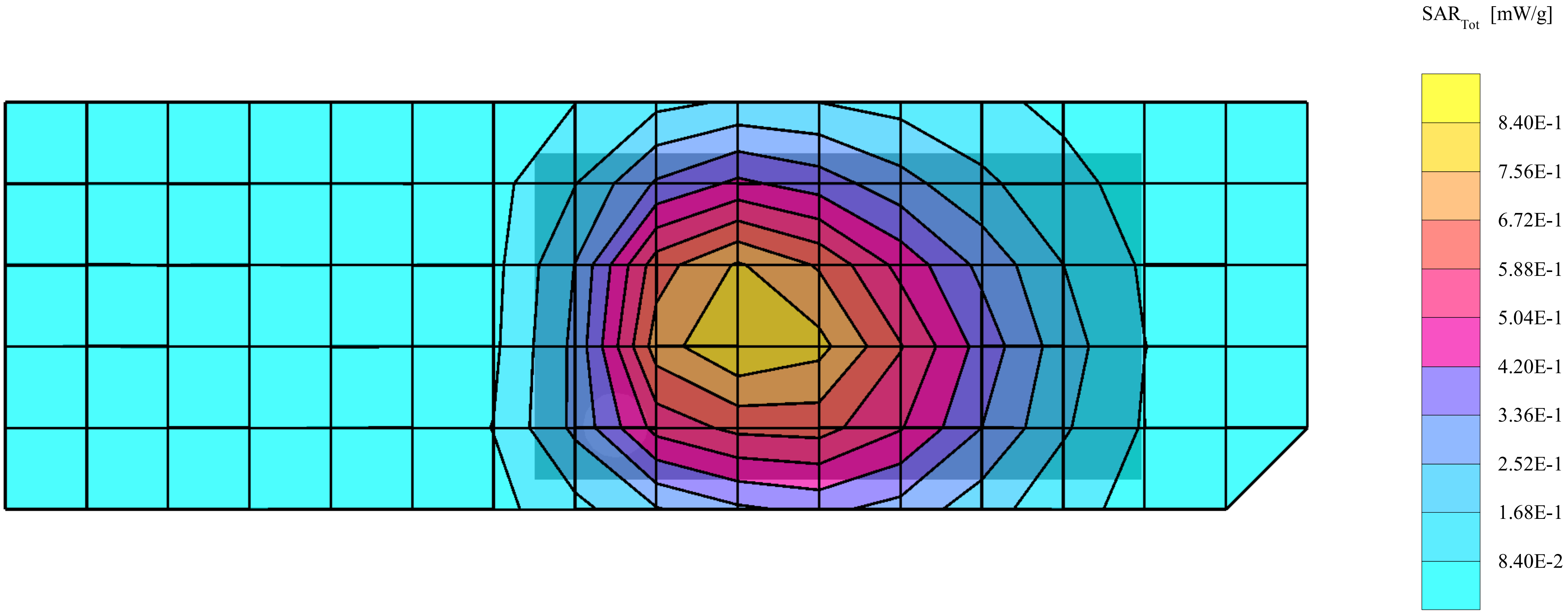
OW3NEM-2, GSM 850, Channel 190, Back of Phone with 15mm Spacer and HDB-4 Headset; MMC

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: σ = 0.93 mho/m ε_r = 54.4 ρ = 1.00 g/cm³
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.834 mW/g, SAR (10g): 0.586 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.13 dB
Liquid Temperature (°C): 18.6



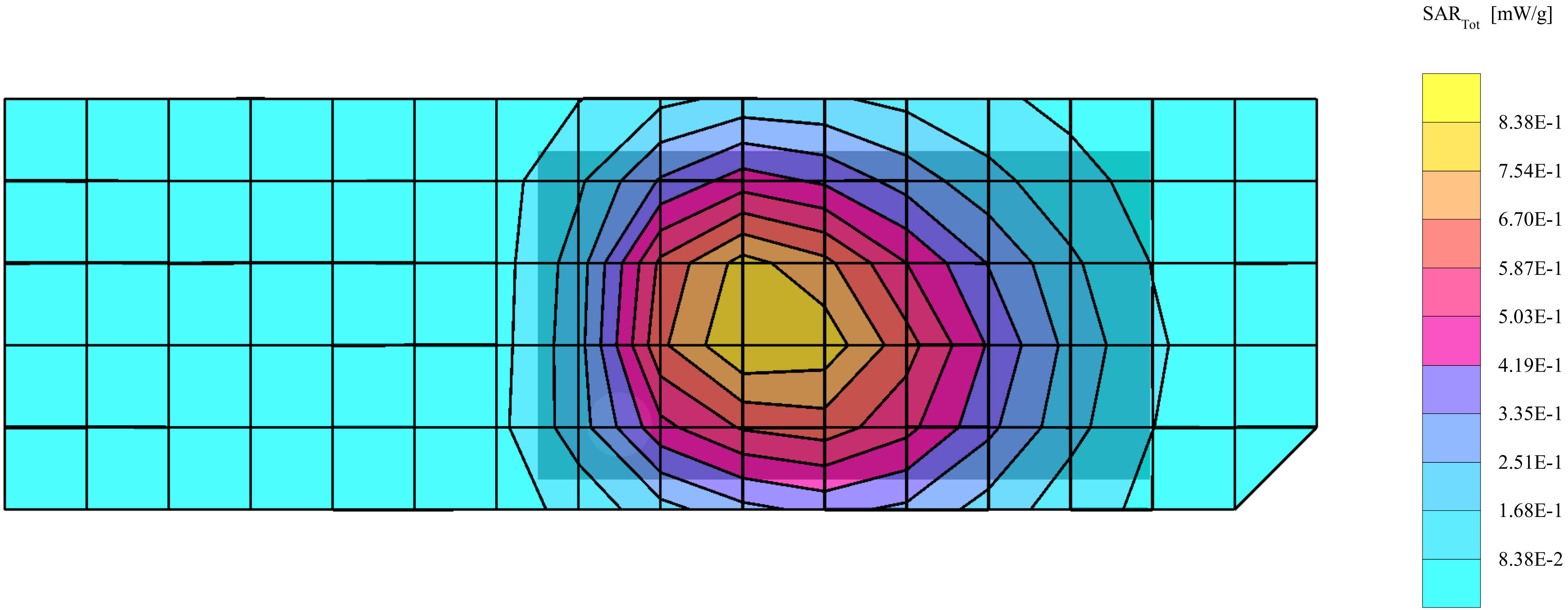
OW3NEM-2, GSM 850, Channel 251, Back of Phone with 15mm Spacer and HDB-4 Headset; MMC Removed

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: σ = 0.93 mho/m ε_r = 54.4 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.810 mW/g, SAR (10g): 0.570 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.12 dB
Liquid Temperature (°C): 18.6



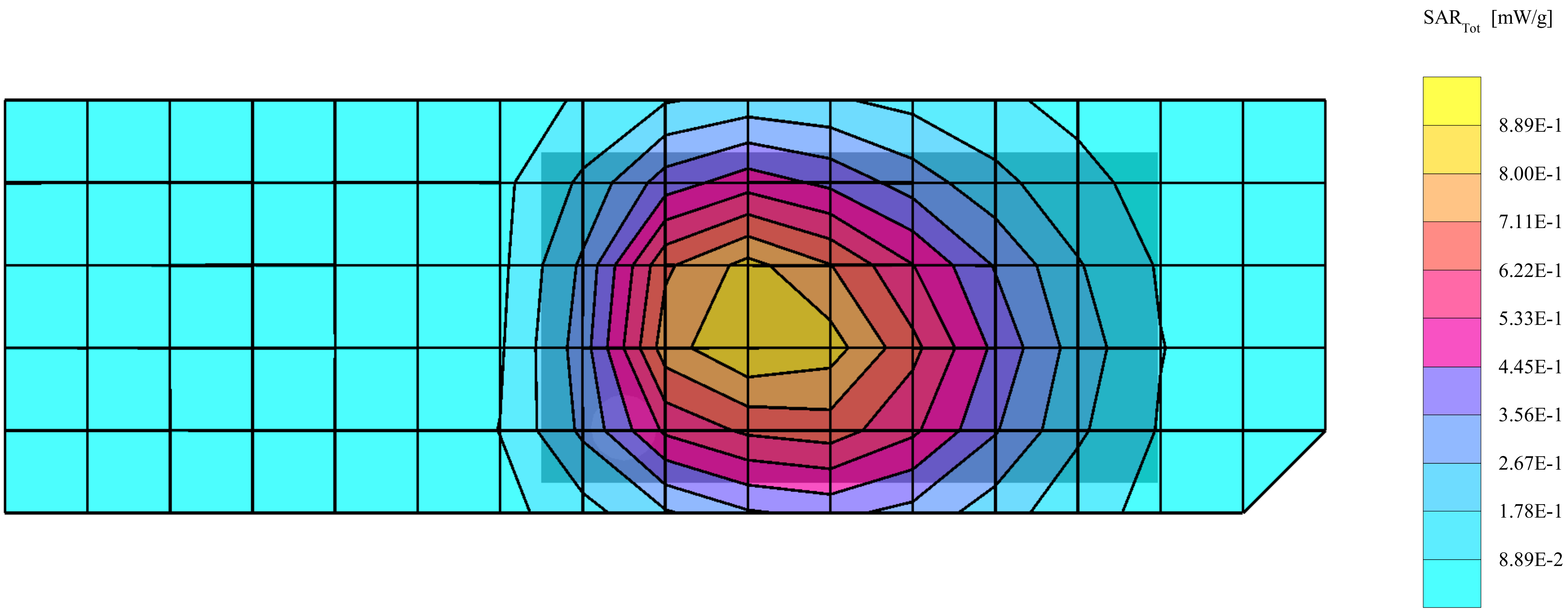
OW3NEM-2, GSM 850, Channel 190, Back of Phone with 15mm Spacer and LPS-4 Loopset; MMC

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 837 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: σ = 0.93 mho/m ε_r = 54.4 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.820 mW/g, SAR (10g): 0.578 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.18 dB
Liquid Temperature (°C): 18.6



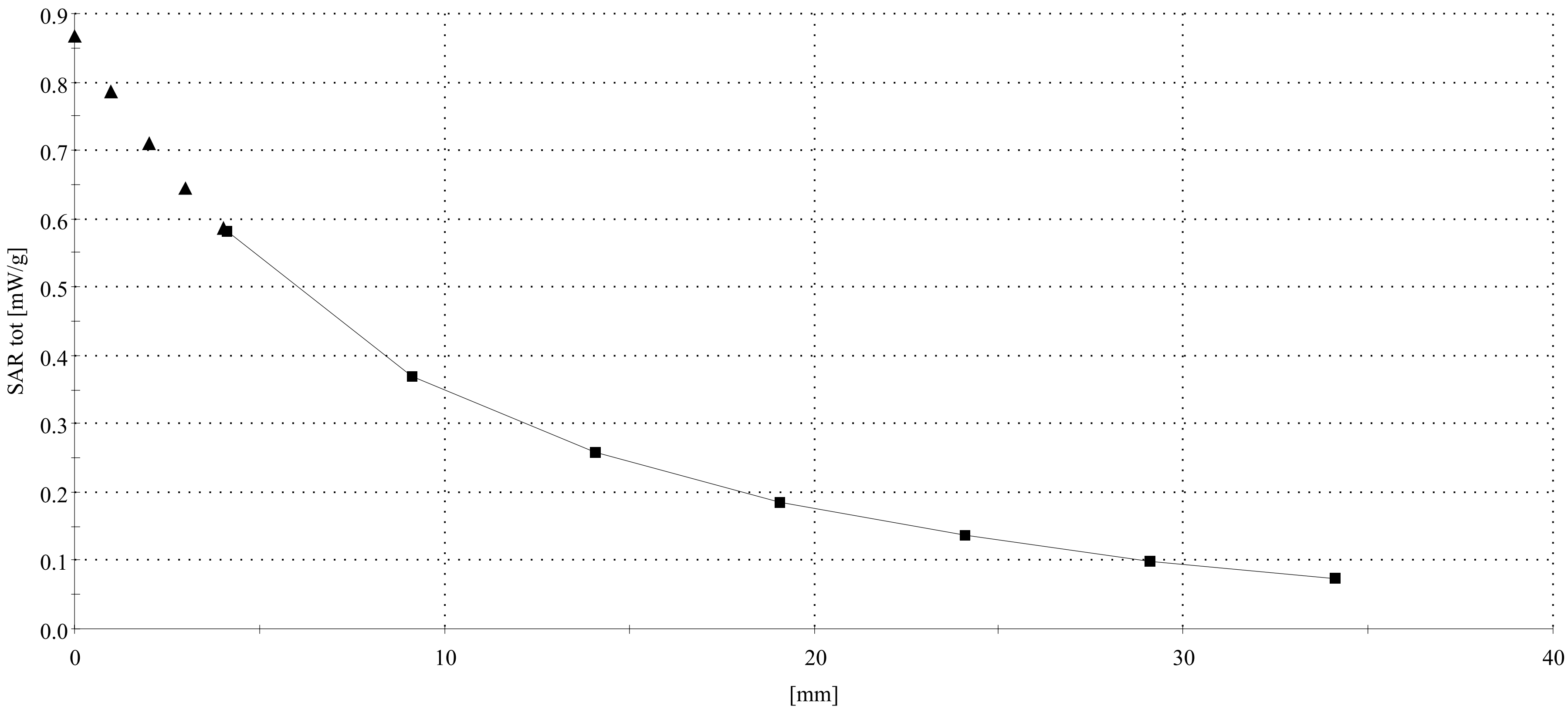
OW3NEM-2, GSM 850, Channel 251, Back of Phone with 15mm Spacer and LPS-4 Loopset; MMC Removed

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: $\sigma = 0.93$ mho/m $\varepsilon_r = 54.4$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.870 mW/g, SAR (10g): 0.614 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 12.0
Powerdrift: -0.10 dB
Liquid Temperature (°C): 18.6



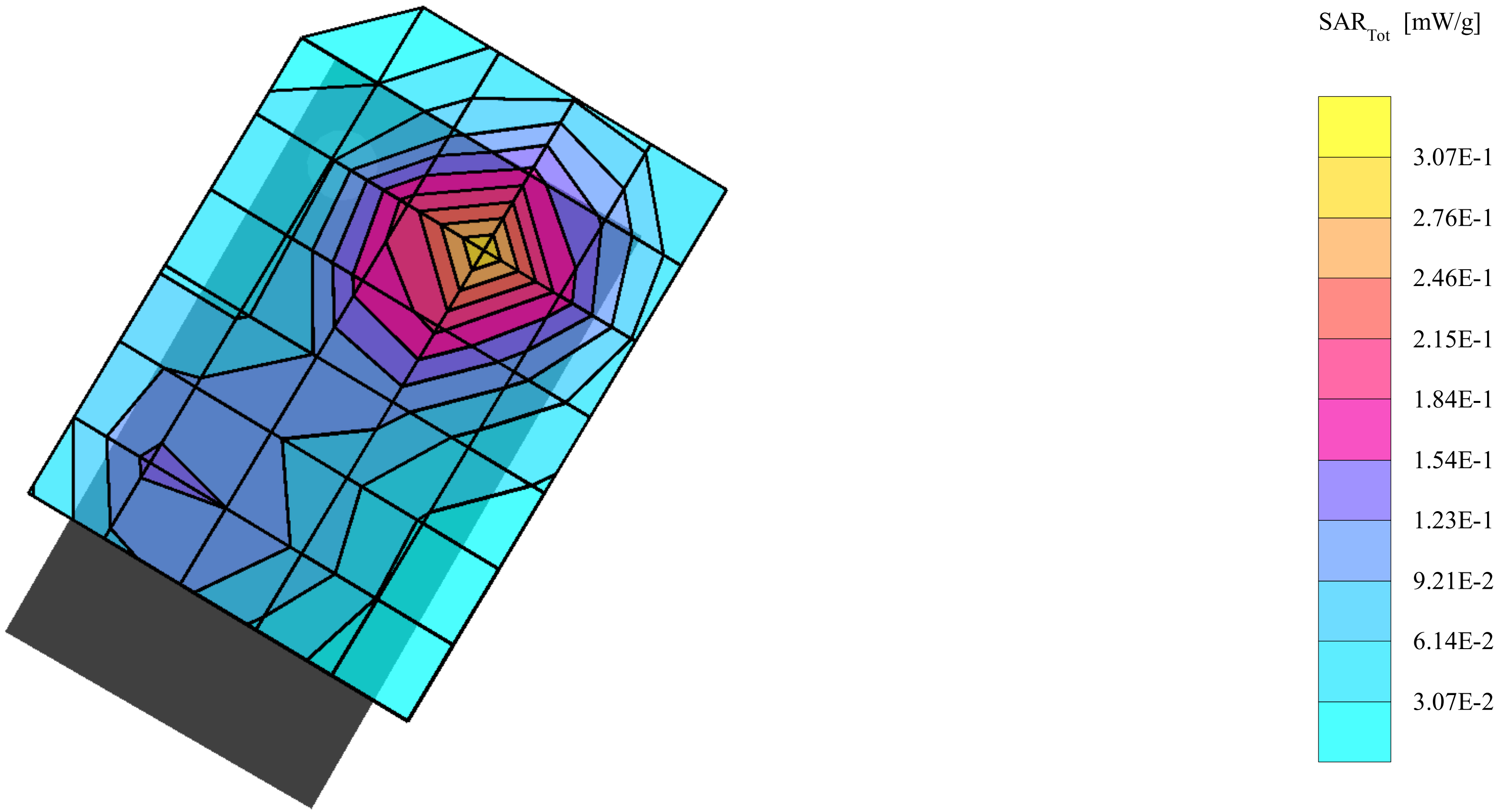
OW3NEM-2, GSM 850, Channel 251, Back of Phone with 15mm Spacer and LPS-4 Loopset; MMC Removed

SAM 2 (Cellular - Muscle Tissue) Phantom
Frequency: 849 MHz; Crest factor: 8.0
Cellular Band - Muscle Tissue: $\sigma = 0.93$ mho/m $\varepsilon_r = 54.4$ $\rho = 1.00$ g/cm^3
Probe: ET3DV6 - SN1504; ConvF(6.50,6.50,6.50)
Cube 5x5x7: SAR (1g): 0.870 mW/g, SAR (10g): 0.614 mW/g, (Worst-case extrapolation)
Cube 5x5x7: Dx = 8.0, Dy = 8.0, Dz = 5.0
Liquid Temperature (°C): 18.6



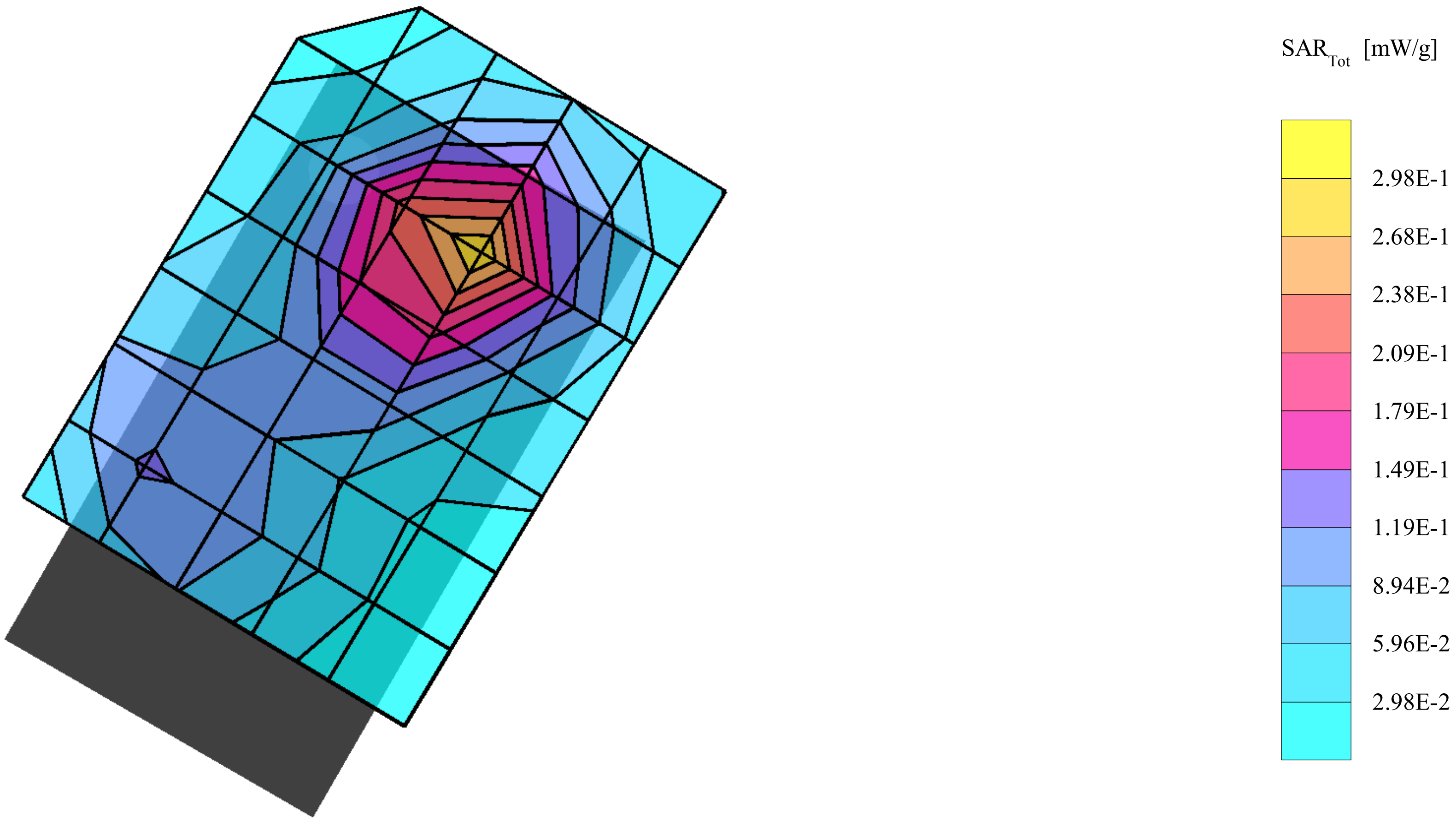
OW3NEM-2, GSM 1900, Channel 661, Left Touch Position with MMC

SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1880 MHz; Crest factor: 8.0
PCS Band - Brain Tissue: σ = 1.44 mho/m ε_r = 40.6 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cube 5x5x7: SAR (1g): 0.271 mW/g, SAR (10g): 0.145 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.01 dB
Liquid Temperature (°C): 19.5



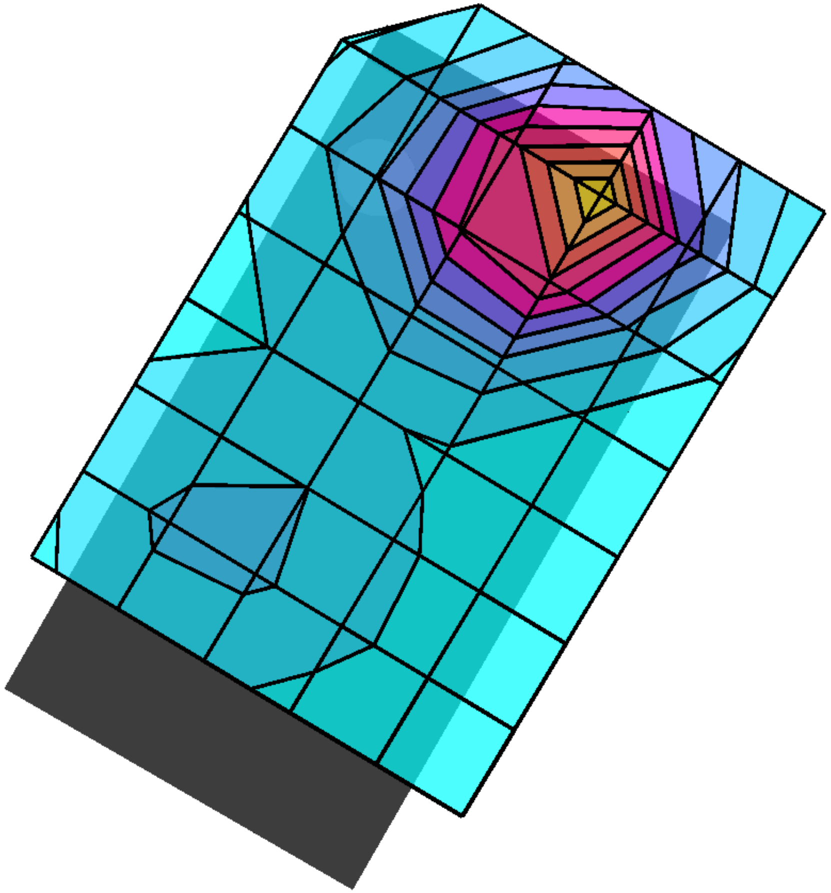
OW3NEM-2, GSM 1900, Channel 661, Left Touch Position; MMC Removed

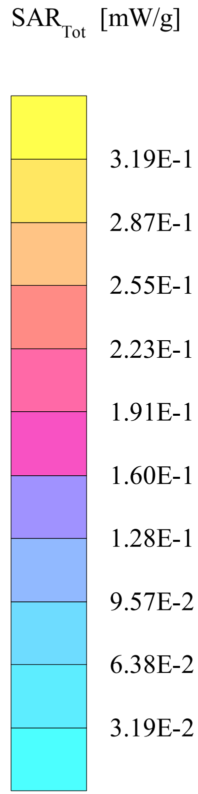
SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1880 MHz; Crest factor: 8.0
PCS Band - Brain Tissue: σ = 1.44 mho/m ε_r = 40.3 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cube 5x5x7: SAR (1g): 0.272 mW/g, SAR (10g): 0.146 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.10 dB
Liquid Temperature (°C): 19.5



OW3NEM-2, GSM 1900, Channel 661, Left Tilt Position with MMC

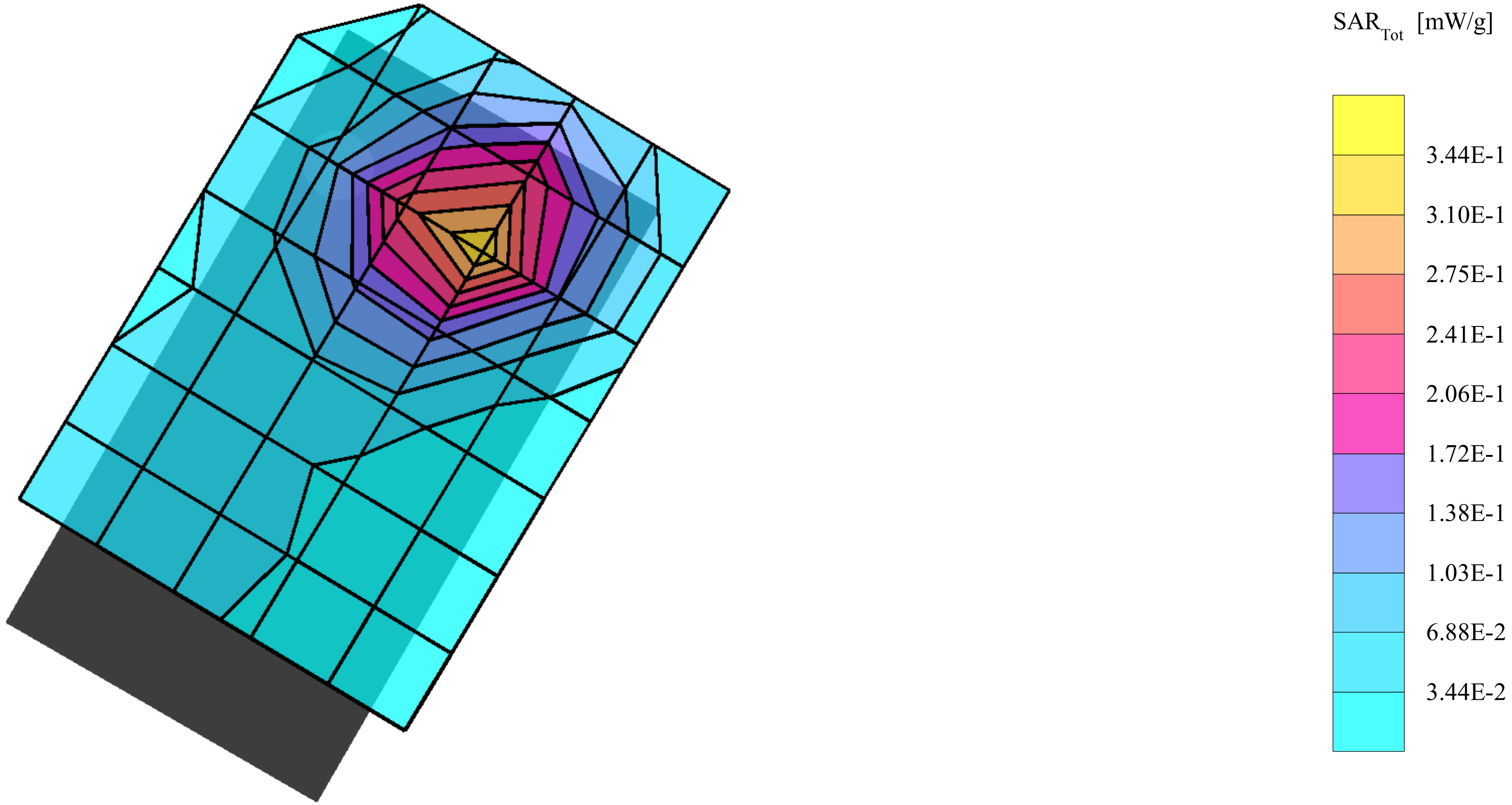
SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1880 MHz; Crest factor: 8.0
PCS Band - Brain Tissue: σ = 1.44 mho/m ε_r = 40.6 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cube 5x5x7: SAR (1g): 0.303 mW/g, SAR (10g): 0.162 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.12 dB
Liquid Temperature (°C): 19.5





OW3NEM-2, GSM 1900, Channel 661, Left Tilt Position; MMC Removed

SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1880 MHz; Crest factor: 8.0
PCS Band - Brain Tissue: σ = 1.44 mho/m ε_r = 40.3 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cube 5x5x7: SAR (1g): 0.324 mW/g, SAR (10g): 0.170 mW/g, (Worst-case extrapolation)
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Powerdrift: -0.09 dB
Liquid Temperature (°C):19.5



OW3NEM-2, GSM 1900, Channel 661, Right Touch Position with MMC

SAM 3 (PCS - Brain / Muscle Tissue) Phantom
Frequency: 1880 MHz; Crest factor: 8.0
PCS Band - Brain Tissue: σ = 1.44 mho/m ε_r = 40.3 ρ = 1.00 g/cm^3
Probe: ET3DV6 - SN1504; ConvF(5.40,5.40,5.40)
Cubes (2): SAR (1g): 0.164 mW/g ± 0.07 dB, SAR (10g): 0.0908 mW/g ± 0.07 dB, (Worst-case extrapolation)
Coarse: Dx = 19.0, Dy = 14.0, Dz = 10.0
Powerdrift: -0.09 dB
Liquid Temperature (°C): 19.5