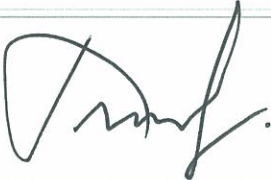





# SAR TEST REPORT

HCT CO., LTD

EUT Type:	800 MHz WLL Telephone		
FCC ID:	PH7PV520		
Model:	PV520	Trade Name	AXESSTEL
Date of Issue:	July 22, 2008		
Test report No.:	HCT-SAR08-0709		
Test Laboratory:	<b>HCT CO., LTD.</b> SAN 136-1, AMI-RI, BUBAL-EUP, ICHEON-SI, KYOUNGKI-DO, 467-701, KOREA TEL: +82 31 639 8565 FAX: +82 31 639 8525		
Applicant :	<b>AXESSTEL INC.</b> 6815 Flanders Drive Ste.210, San Diego, CA 92121, U.S.A. Tel: 858- 625-2100 Fax: 858- 625- 2110 E-Mail: dskim@axesstel.com		
Testing has been carried out in accordance with:	47CFR §2.1093 FCC OET Bulletin 65(Edition 97-01), Supplement C (Edition 01-01) ANSI/ IEEE C95.1 – 2005 IEEE 1528-2003		
Test result:	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.		
Signature	 _____ Report prepared by : Sun-Hee Kim Test Engineer of SAR Part	 _____ Approved by : Nam-Wook Kang Manager of SAR Part	

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# 1. INTRODUCTION

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices.

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-2005 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017. The measurement procedure described in IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in Biological Effects and Exposure Criteria for Radio frequency Electromagnetic Fields," NCRP Report No. 86 NCRP, 1986, Bethesda, MD 20814. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

## SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative of the incremental electromagnetic energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (r). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body.

$$SAR = \frac{d}{dt} \left( \frac{dU}{dm} \right) = \frac{d}{dt} \left( \frac{dU}{\rho dV} \right)$$

**Figure 2. SAR Mathematical Equation**

**SAR is expressed in units of Watts per Kilogram (W/kg).**

$$SAR = \sigma E^2 / \rho$$

where:

- $\sigma$  = conductivity of the tissue-simulant material (S/m)
- $\rho$  = mass density of the tissue-simulant material (kg/m<sup>3</sup>)
- $E$  = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.

## 2. DESCRIPTION OF DEVICE

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head and body tissues exposed to radio frequency (RF) radiation from wireless portable devices for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC).

EUT Type	800 MHz WLL Telephone
FCC ID	PH7PV520
Model(s)	PV520
Trade Name	AXESSTEL
Serial Number(s)	#1
Application Type	Certification
Modulation(s)	CDMA835
Tx Frequency	824.70 - 848.31 MHz (CDMA)
Rx Frequency	869.70 - 893.31 MHz (CDMA)
FCC Classification	Licensed Non-Broadcast station Transmitter - TNB
Production Unit or Identical Prototype	Prototype
Max SAR	0.891 W/kg CDMA835 Body SAR
Date(s) of Tests	July 21, 2008
Antenna Type	Intenna

## 3. DESCRIPTION OF TEST EQUIPMENT

### 3.1 SAR MEASUREMENT SETUP

These measurements are performed using the DASY4 automated dosimetric assessment system. It is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland. It consists of high precision robotics system (Staubli), robot controller, Pentium III computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Figure.3.1).

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The PC consists of the HP Pentium IV 3.0 GHz computer with Windows XP system and SAR Measurement Software DASY4, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

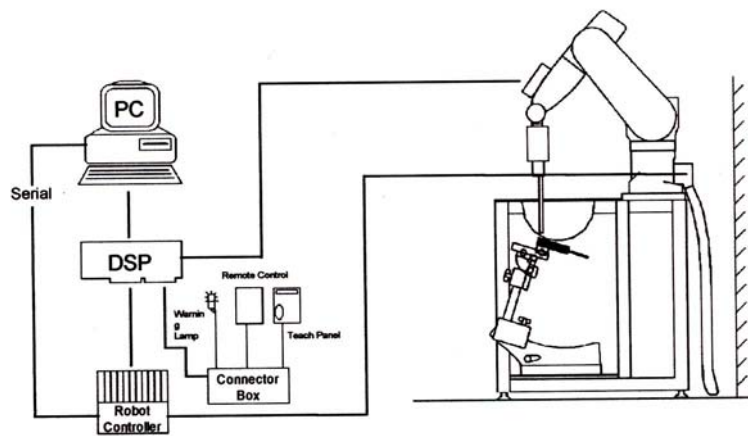


Figure 3.1 HCT SAR Lab. Test Measurement Set-up

The DAE4 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail in.

## 3.2 DASY E-FIELD PROBE SYSTEM

### 3.2.1 ET3DV6 Probe Specification

Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection System Built-in shielding against static charges
Calibration	In air from 10 MHz to 2.5 GHz In brain and muscle simulating tissue at Frequencies of 450 MHz, 900 MHz and 1.8 GHz (accuracy: 8 %)
Frequency	10 MHz to 2.3 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 3 GHz)
Directivity	$\pm 0.2$ dB in brain tissue (rotation around probe axis) $\pm 0.4$ dB in brain tissue (rotation normal probe axis)
Dynamic Range	5 $\mu$ W/g to > 100 mW/g; Linearity: $\pm 0.2$ dB
Surface Detection	$\pm 0.2$ mm repeatability in air and clear liquids over diffuse reflecting surfaces.
Dimensions	Overall length: 330 mm Tip length: 16 mm Body diameter: 12 mm Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm
Application	General dissymetry up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms



Figure 3.2 Photograph of the probe and the Phantom

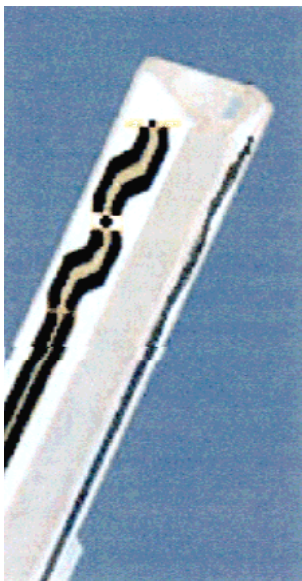


Figure 3.3 ET3DV6 E-field Probe

The SAR measurements were conducted with the dosimetric probe ET3DV6, designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches a maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY4 software reads the reflection during a software approach and looks for the maximum using a 2<sup>nd</sup> order fitting. The approach is stopped at reaching the maximum.

## 3.3 PROBE CALIBRATION PROCESS

### 3.3.1 E-Probe Calibration

Each probe is calibrated according to a dosimetric assessment procedure with an accuracy better than  $\pm 10\%$ . The spherical isotropy was evaluated with the proper procedure and found to be better than  $\pm 0.25$  dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe is tested.

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

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

$$SAR = C \frac{\Delta T}{\Delta t}$$

where:

- $\Delta t$  = exposure time (30 seconds),
- C = heat capacity of tissue (brain or muscle),
- $\Delta T$  = temperature increase due to RF exposure.

SAR is proportional to  $\Delta T / \Delta t$ , the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E-field;

$$SAR = \frac{|E|^2 \cdot \sigma}{\rho}$$

where:

- $\sigma$  = simulated tissue conductivity,
- $\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

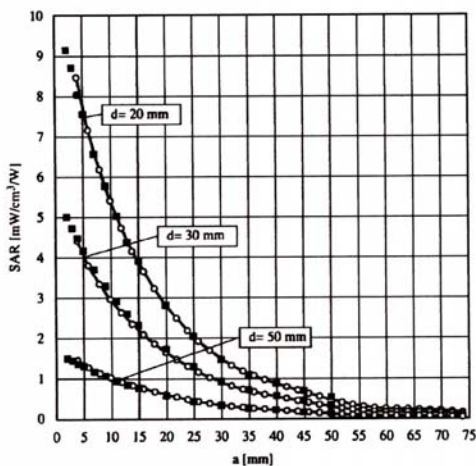


Figure 3.4 E-Field and Temperature measurements at 900 MHz

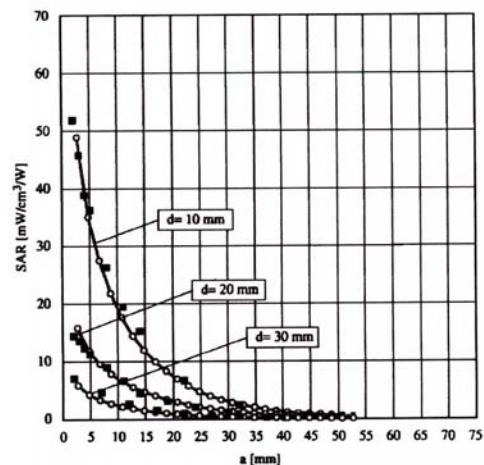


Figure 3.5 E-Field and temperature measurements at 1.8 GHz

### 3.3.2 Data Extrapolation

The DASY4 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

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

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

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with  $V_i$  = compensated signal of channel i (i = x,y,z)  
 $Norm_i$  = sensor sensitivity of channel i (i = x,y,z)  
 $\mu V/(V/m)^2$  for E-field probes  
 $ConvF$  = sensitivity of enhancement in solution  
 $E_i$  = electric field strength of channel i in V/m

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

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with  $SAR$  = local specific absorption rate in W/g  
 $E_{tot}$  = total field strength in V/m  
 $\sigma$  = conductivity in [mho/m] or [Siemens/m]  
 $\rho$  = equivalent tissue density in g/cm<sup>3</sup>

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

$$P_{pwe} = \frac{E_{tot}^2}{3770}$$

with  $P_{pwe}$  = equivalent power density of a plane wave in W/cm<sup>2</sup>  
 $E_{tot}$  = total electric field strength in V/m



### 3.4 SAM Phantom

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

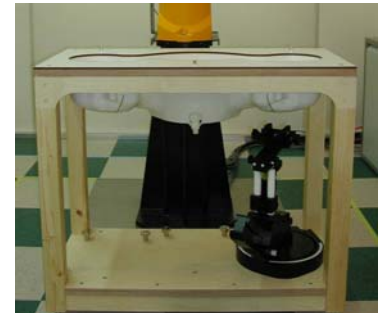


Figure 3.6 SAM Phantom

Shell Thickness	2.0 mm
Filling Volume	about 30 L
Dimensions	810 mm x 1 000 mm x 500 mm (H x L x W)

### 3.5 Device Holder for Transmitters

In combination with the SAM Phantom V 4.0, the Mounting Device (POM) enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatably positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

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



Figure 3.7 Device Holder

### 3.6 Brain & Muscle Simulating Mixture Characterization

The brain and muscle mixtures consist of a viscous gel using hydrox-ethyl cellulose (HEC) gelling agent and saline solution (see Table 3.1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrove.

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1 900		2 450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7

Salt:	99 % Pure Sodium Chloride	Sugar:	98 % Pure Sucrose
Water:	De-ionized, 16M resistivity	HEC:	Hydroxyethyl Cellulose
DGBE:	99 % Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy) ethanol]		
Triton X-100(ultra pure):	Polyethylene glycol mono[4-(1,1,3,3-tetramethylbutyl)phenyl] ether		

**Table 3.1 Composition of the Tissue Equivalent Matter**

### 3.7 SAR TEST EQUIPMENT

Manufacturer	Type / Model	S/N	Calib. Date	Calib.Interval	Calib.Due
SPEAG	SAM Phantom	-	N/A	N/A	N/A
Staubli	Robot RX90L	F01/5K09A1/A/01	N/A	N/A	N/A
Staubli	Robot ControllerCS7MB	F99/5A82A1/C/01	N/A	N/A	N/A
HP	Pavilion t000_puffer	KRJ51201TV	N/A	N/A	N/A
SPEAG	Light Alignment Sensor	265	N/A	N/A	N/A
Staubli	Teach Pendant (Joystick)	D221340.01	N/A	N/A	N/A
SPEAG	DAE4V1	447	Sep.13, 2007	Annual	Sep.13, 2008
SPEAG	E-Field Probe ET3DV6	1609	Aug.30, 2007	Annual	Aug.30, 2008
SPEAG	E-Field Probe ET3DV6	1798	Mar. 20, 2008	Annual	Mar. 20, 2009
SPEAG	Validation Dipole D835V2	441	May 19, 2008	Annual	May 19, 2009
SPEAG	Validation Dipole D1900V2	5d038	Nov.20, 2007	Annual	Nov.20, 2008
SPEAG	Validation Dipole D2450V2	734	Aug.20,2007	Annual	Aug.20,2008
Agilent	Power Meter(F) E4419B	MY41291386	Nov.05, 2007	Annual	Nov.05, 2008
Agilent	Power Sensor(G) 8481	MY41090870	Nov.05, 2007	Annual	Nov.05, 2008
HP	Dielectric Probe Kit 85070C	00721521	N/A	N/A	N/A
HP	Dual Directional Coupler	16072	Nov. 05, 2007	Annual	Nov. 05, 2008
R&S	Base Station CMU200	838207/050	Nov. 05, 2007	Annual	Nov. 05, 2008
Agilent	Base Station E5515C	GB44400269	Feb.10, 2008	Annual	Feb.10, 2009
HP	Signal Generator E4438C	MY42082646	Dec.24, 2007	Annual	Dec.24, 2008
HP	Network Analyzer 8753ES	JP39240221	Apr.11, 2008	Annual	Apr.11, 2009
EM POWER	Power Amp BBS3Q7ELU	1013-D/C-0127	Apr.12, 2008	Annual	Apr.12, 2009
Tescom	TC-3000/ Bluetooth	3000A4900112	Jan.11,2008	Annual	Jan.11,2009

**NOTE:**

The E-field probe was calibrated by SPEAG, by the waveguide technique procedure. Dipole Validation measurement is performed by HCT Lab. before each test. The brain simulating material is calibrated by HCT using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the brain-equivalent material.

## 4. SAR MEASUREMENT PROCEDURE

The evaluation was performed with the following procedure:

1. The SAR value at a fixed location above the ear point was measured and was used as a reference value for assessing the power drop.
2. The SAR distribution at the exposed side of the head was measured at a distance of 3.9 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20 mm x 20 mm. Based on this data, the area of the maximum absorption was determined by spline interpolation.
3. Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:
  - a. The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
  - b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed using the 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions. The volume was integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
  - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR value, at the same location as procedure #1, was re-measured. If the value changed by more than 5 %, the evaluation is repeated.

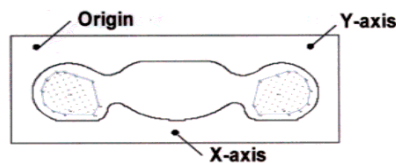


Figure 4.1 SAR Measurement Point in Area Scan

## 5. DESCRIPTION OF TEST POSITION

### 5.1 HEAD POSITION

The device was placed in a normal operating position with the Point A on the device, as illustrated in following drawing, aligned with the location of the RE(ERP) on the phantom. With the ear-piece pressed against the head, the vertical center line of the body of the handset was aligned with an imaginary plane consisting of the RE, LE and M. While maintaining these alignments, the body of the handset was gradually moved towards the cheek until any point on the mouth-piece or keypad contacted the cheek. This is a cheek/touch position. For ear/tilt position, while maintain the device aligned with the BM and FN lines, the device was pivot against ERP back for 15° or until the device antenna touch the phantom. Please refer to IEEE 1528-2003 illustration below.

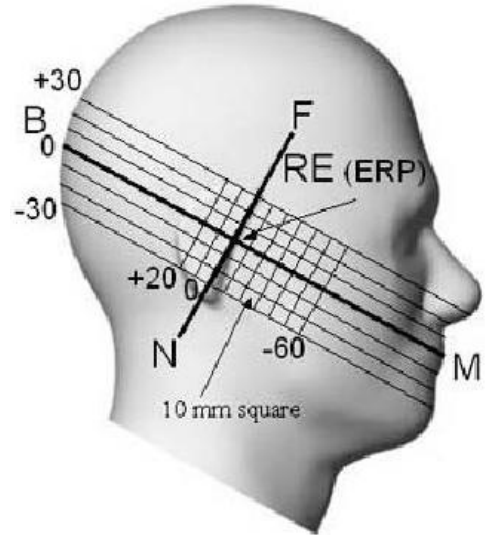


Figure 5.1 Side view of the phantom

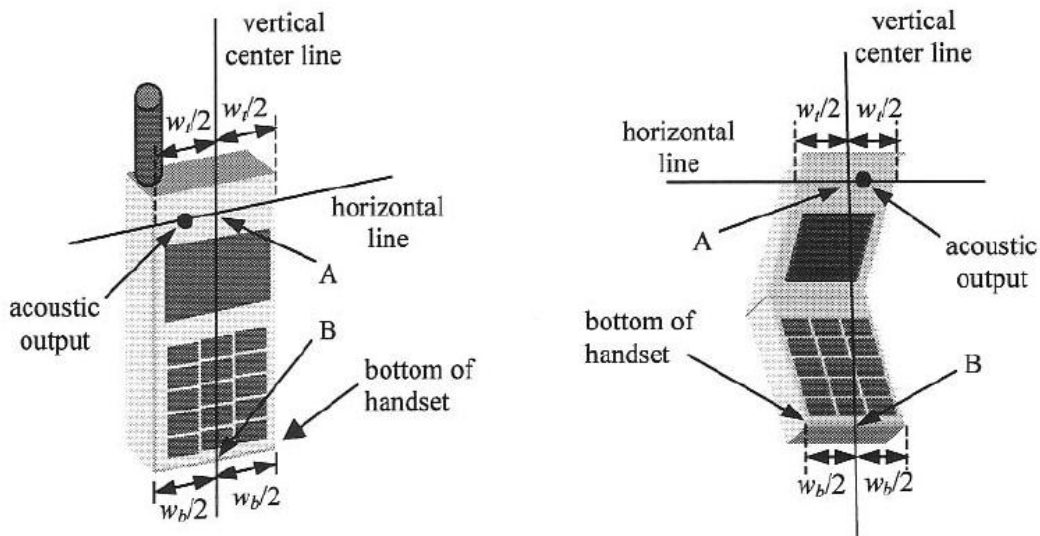


Figure 5.2 Handset vertical and horizontal reference lines

## **5.2 Body Holster/Belt Clip Configurations**

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration. A device with a headset output is tested with a headset connected to the device. Body dielectric parameters are used.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with each accessory. If multiple accessory share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some Devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used.

Since this EUT does not supply any body worn accessory to the end user a distance of 2.0 cm from the EUT back surface to the liquid interface is configured for the generic test.

"See the Test SET-UP Photo"

Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessory(ies), including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.

In all cases SAR measurements are performed to investigate the worst-case positioning. Worstcase positioning is then documented and used to perform Body SAR testing.

## 6. MEASUREMENT UNCERTAINTY

Measurement uncertainties in SAR measurements are difficult to quantify due to several variables including biological, physiological, and environmental. However, we estimate the measurement uncertainties in SAR to be less than 15 % - 25 %.

According to ANSI/IEEE C95.3, the overall uncertainties are difficult to assess and will vary with the type of meter and usage situation. However, accuracy's of 1 dB to  $\pm 3$  dB can be expected in practice, with greater uncertainties in near-field situations and at higher frequencies (shorter wavelengths), or areas where large reflecting objects are present. Under optimum measurement conditions, SAR measurement uncertainties of at least  $\pm 2$  dB can be expected.

According to CENELEC, typical worst-case uncertainty of field measurements is 5 dB. For well-defined modulation characteristics the uncertainty can be reduced to  $\pm 3$  dB.

Error Description	Uncertainty value [%]	Probability Distribution	Divisor	ci	ci <sup>2</sup>	Standard Uncertainty [%]	Stand Uncert <sup>2</sup>	(Stand Uncert <sup>2</sup> ) X (ci <sup>2</sup> )	Vi & Ve//
<b>1. Measurement System</b>									
Probe Calibration	5.5	Normal	1.00	1	1	5.50	30.25	30.25	$\infty$
Axial Isotropy	4.7	Rectangular	1.73	0.7	0.49	2.71	7.36	3.61	$\infty$
Hemispherical Isotropy	9.6	Rectangular	1.73	0.7	0.49	5.54	30.72	15.05	$\infty$
Linearity	4.7	Rectangular	1.73	1	1	2.71	7.36	7.36	$\infty$
System Detection limits	1.0	Rectangular	1.73	1	1	0.58	0.33	0.33	$\infty$
Boundary effect	1.0	Rectangular	1.73	1	1	0.58	0.33	0.33	$\infty$
Response time	0.8	Rectangular	1.73	1	1	0.46	0.21	0.21	$\infty$
RF Ambient conditions	3.0	Rectangular	1.73	1	1	1.73	3.00	3.00	$\infty$
Readout Electronics	0.3	Normal	1.00	1	1	0.30	0.09	0.09	$\infty$
Integration time	2.6	Rectangular	1.73	1	1	1.50	2.25	2.25	$\infty$
Probe positioner	0.4	Rectangular	1.73	1	1	0.23	0.05	0.05	$\infty$
Probe positioning	2.9	Rectangular	1.73	1	1	1.67	2.80	2.80	$\infty$
Maximum SAR evaluation	1.0	Rectangular	1.73	1	1	0.58	0.33	0.33	$\infty$
<b>Sub Total</b>								<b>65.69</b>	
<b>2. Test Sample Related</b>									
Device Positioning	1.8	Normal	1.00	1	1	1.81	3.28	3.28	9
Device Holder	3.6	Normal	1.00	1	1	3.60	12.96	12.96	$\infty$
Power Drift	5.0	Rectangular	1.73	1	1	2.89	8.33	8.33	$\infty$
<b>Sub Total</b>								<b>24.57</b>	
<b>3. Phantom and Setup</b>									
Phantom Uncertainty	4.0	Rectangular	1.73	1	1	2.31	5.33	5.33	$\infty$
Liquid conductivity (target)	5.0	Rectangular	1.73	0.5	0.25	2.89	8.33	2.08	$\infty$
Liquid conductivity (measurement error)	2.5	Normal	1.00	0.5	0.25	2.50	6.25	1.56	$\infty$
Liquid permittivity (target)	5.0	Rectangular	1.73	0.5	0.25	2.89	8.33	2.08	$\infty$
Liquid permittivity (measurement error)	2.5	Normal	1.00	0.5	0.25	2.50	6.25	1.56	$\infty$
<b>Sub Total</b>								<b>12.63</b>	
<b>Combined standard SAR uncertainty [%]</b>						<b>10.14</b>		102.88	-
<b>Expanded uncertainty [k=2, approximately confidence level 95 %]</b>						<b><math>\pm 20.28</math> %</b>			

**Table 6.1 Breakdown of Errors**

## 7. ANSI/ IEEE C95.1 - 2005 RF EXPOSURE LIMITS

HUMAN EXPOSURE	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Occupational (W/kg) or (mW/g)
SPATIAL PEAK SAR * (Brain)	1.60	8.00
SPATIAL AVERAGE SAR ** (Whole Body)	0.08	0.40
SPATIAL PEAK SAR *** (Hands / Feet / Ankle / Wrist)	4.00	20.00

**Table 7.1 Safety Limits for Partial Body Exposure**

**NOTES:**

\* The Spatial Peak value of the SAR averaged over any 1 g of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

\*\* The Spatial Average value of the SAR averaged over the whole-body.

\*\*\* The Spatial Peak value of the SAR averaged over any 10 g of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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

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



## 8. SYSTEM VERIFICATION

### 8.1 Tissue Verification

Freq. [MHz]	Date	Liquid	Liquid Temp.[°C]	Parameters	Target Value	Measured Value	Deviation [%]	Limit [%]
835	July 21, 2008	Head	21.2	$\epsilon r$	41.5	41.2	- 0.72	± 5
				$\sigma$	0.90	0.868	- 3.56	± 5
835	July 21, 2008	Body	21.2	$\epsilon r$	55.2	55.8	+ 1.09	± 5
				$\sigma$	0.97	0.99	+ 2.06	± 5

### 8.2 System Validation

Prior to assessment, the system is verified to the ± 10 % of the specifications at 835 MHz by using the system validation kit. (Graphic Plots Attached)

\* Input Power: 1 W

Freq. [MHz]	Date	Liquid	Liquid Temp. [°C]	SAR Average	Target Value (SPEAG) (mW/g)	Measured Value (mW/g)	Deviation [%]	Limit [%]
835	July 21, 2008	Head	21.2	1 g	9.17	9.53	+ 3.93	± 10

## **9. 3G MEASUREMENT PROCEDURES**

### **9.1 Procedures Used To Establish Test Signal**

The handset was placed into a simulated call using a base station simulator in a shielded chamber. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR. SAR measurements were taken with a fully charged battery. In order to verify that the device was tested and maintained at full power, this was configured with the base station simulator. The SAR measurement software calculates a reference point at the start and end of the test to check for power drifts. If conducted power deviations of more than 5% occurred, the tests were repeated.

### **9.2 SAR Measurement Conditions for CDMA2000 1x**

These procedures were followed according to FCC "SAR Measurement Procedures for 3G Devices", May 2006.

#### **9.2.1 Output Power Verification**

See 3GPP2 C.S0011/TIA-98-E as recommended by "SAR Measurement Procedures for 3G Devices", May 2006. Maximum output power is verified on the High, Middle and Low channels according to procedures defined in section 4.4.5.2 of 3GPP2 C.S0011/TIA-98-E. SO55 tests were measured with power control bits in "All Up" condition.

1. If the mobile station supports Reverse TCH RC 1 and Forward TCH RC 1, set up a call using Fundamental Channel Test Mode 1 (RC=1/1) with 9 600 bps data rate only.
2. Under RC1, C.S0011 Table 4.4.5.2-1 (Table 9.1) parameters were applied.
3. If the MS supports the RC 3 Reverse FCH, RC3 Reverse SCH0 and demodulation of RC 3, 4, or 5, set up a call using Supplemental Channel Test Mode 3 (RC 3/3) with 9 600 bps Fundamental Channel and 9 600 bps SCH0 data rate Channel and 9 600 bps SCH0 data rate.
4. Under RC3, C.S0011 Table 4.4.5.2-2 (Table 9.2) was applied.
5. FCHs were configured at full rate for maximum SAR with "All Up" power control bits.

**Parameters for Max. Power for RC1**

Parameter	Units	Value
$\bar{I}_{or}$	dBm/1.23 MHz	-104
$\frac{Pilot E_c}{I_{or}}$	dB	-7
$\frac{Traffic E_c}{I_{or}}$	dB	-7.4

Table. 9.1

**Parameters for Max. Power for RC3**

Parameter	Units	Value
$\bar{I}_{or}$	dBm/1.23 MHz	-86
$\frac{Pilot E_c}{I_{or}}$	dB	-7
$\frac{Traffic E_c}{I_{or}}$	dB	-7.4

Table. 9.2

#### **9.2.2 Head SAR Measurement**

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

### 9.2.3 Body SAR Measurement

SAR for body exposure configurations is 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 + SCHn) is not required when the maximum average output of each RF channel is less than ¼ dB higher than that measured with FCH only. Otherwise, SAR is measured on the maximum output channel (FCH + SCHn) with FCH at full rate and SCH0 enabled at 9 600 bps using the exposure configuration that results in the highest SAR for that channel with FCH only. When multiple code channels are 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 is not required when the maximum average output of each channel is less than ¼ dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel in RC1; with Loopback Service Option SO55, at full rate, using the body exposure configuration that results in the highest SAR for that channel in RC3.

### 9.2.4 Handsets with EV-DO

For handsets with Ev-Do capabilities, when the maximum average output of each channel in Rev. 0 is less than ¼ dB higher than that measured in RC3 (1x RTT), body SAR for Ev-Do is not required. Otherwise, SAR for Rev. 0 is measured on the maximum output channel at 153.6 kbps using the body exposure configuration that results in the highest SAR for that channel in RC3. SAR for Rev. A is not required when the maximum average output of each channel is less than that measured in Rev. 0 or less than ¼ dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel for Rev. A using a Reverse Data Channel payload size of 4 096 bits and a Termination Target of 16 slots defined for Subtype 2 Physical Layer configurations. A Forward Traffic Channel data rate corresponding to the 2-slot version of 307.2 kbps with the ACK Channel transmitting in all slots should be configured in the downlink for both Rev. 0 and Rev. A.

#### Average Output Power Measurement for FCC ID: PH7PV520

Band	Channel	SO2	SO2	SO55	SO55	TDSO	1xEvDO	1xEvDO	1xEvDO	1xEvDO
		RC1/1	RC3/3	RC1/1	RC3/3	SO32	Rev.0	Rev.0	Rev.A	Rev.A
		RC1/1	RC3/3	RC1/1	RC3/3	RC3/3	(FTAP)	(RTAP)	(FETAP)	(RETAP)
CDMA	1013	24.01	23.78	24.05	23.78	23.92	23.89	23.68	23.80	23.69
	384	23.31	23.41	23.33	23.35	23.46	23.31	23.21	23.29	23.25
	777	23.78	23.65	23.73	23.70	23.80	23.70	23.44	23.68	23.47

## 10. SAR TEST DATA SUMMARY

### 10.1 Measurement Results (CDMA835 Body SAR)

Frequency		Modulation	Conducted Power (dBm)		Battery	Separation Distance	Antenna Type	SAR(W/kg)
MHz	Channel		Begin	End				
824.70	1013 (Low)	CDMA835	23.92	23.92	With Charger	2.0 cm	90 degree upright	0.865
836.52	384 (Mid)	CDMA835	23.46	23.48	With Charger	2.0 cm	90 degree upright	0.807
848.31	777 (High)	CDMA835	23.80	23.68	With Charger	2.0 cm	90 degree upright	0.891
824.70	1013 (Low)	EVDO	23.89	23.92	With Charger	2.0 cm	90 degree upright	0.839
836.52	384 (Mid)	EVDO	23.31	23.42	With Charger	2.0 cm	90 degree upright	0.801
848.31	777 (High)	EVDO	23.70	23.66	With Charger	2.0 cm	90 degree upright	0.873
848.31	777 (High)	CDMA835	23.80	23.68	Without Charger	2.0 cm	90 degree upright	0.885
<b>ANSI/ IEEE C95.1 2005 – Safety Limit Spatial Peak Uncontrolled Exposure/ General Population</b>						<b>Head 1.6 W/kg</b> <small>Averaged over 1 gram</small>		

**NOTES:**

- The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supplement C [July 2001].
- All modes of operation were investigated and the worst-case are reported.
- Measured Depth of Simulating Tissue is 15.0 ± 0.2 cm.
- Tissue parameters and temperatures are listed on the SAR plot.
- Battery Type             Standard with Charger     Extended             Slim  
Batteries are fully charged for all readings.
- Test Signal Call Mode     Manual Test cord         Base Station Simulator
- EVDO Body SAR was tested under Rev.0 FTAP mode.

## 11. CONCLUSION

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The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the ANSI/IEEE C95.1 2005.

These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests.

## 12. REFERENCES

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## Attachment 1. – SAR Test Plots

Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008

**DUT: PV520; Type: WLL Phone; Serial:#1**

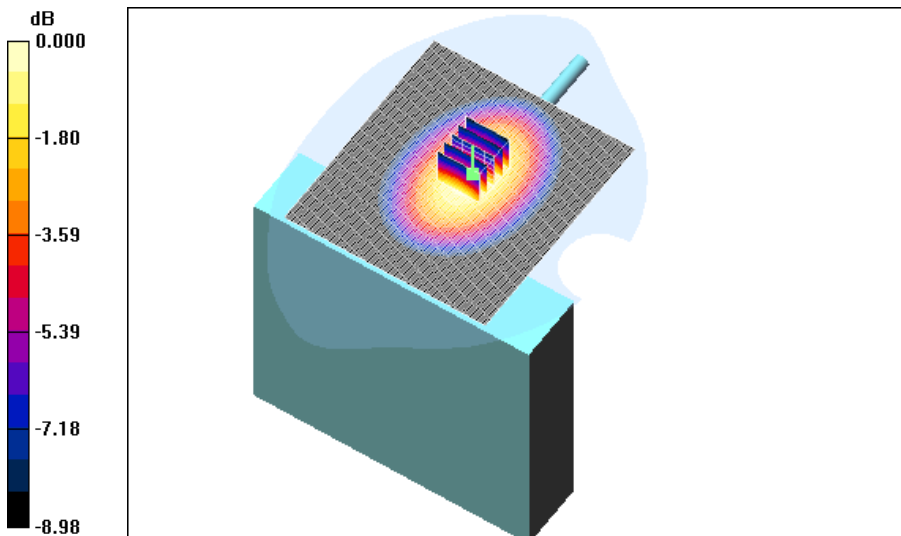
Communication System: CDMA 835MHz FCC; Frequency: 824.7 MHz; Duty Cycle: 1:1  
Medium parameters used:  $f = 825$  MHz;  $\sigma = 0.979$  mho/m;  $\epsilon_r = 55.9$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 1013/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm  
Maximum value of SAR (interpolated) = 0.912 mW/g

**Body CDMA 1013/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm  
Reference Value = 30.8 V/m; Power Drift = -0.002 dB  
Peak SAR (extrapolated) = 1.15 W/kg  
**SAR(1 g) = 0.865 mW/g; SAR(10 g) = 0.617 mW/g**  
Maximum value of SAR (measured) = 0.925 mW/g



0 dB = 0.925mW/g



Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 836.52 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 836.52$  MHz;  $\sigma = 0.993$  mho/m;  $\epsilon_r = 55.7$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 384/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.859 mW/g

**Body CDMA 384/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

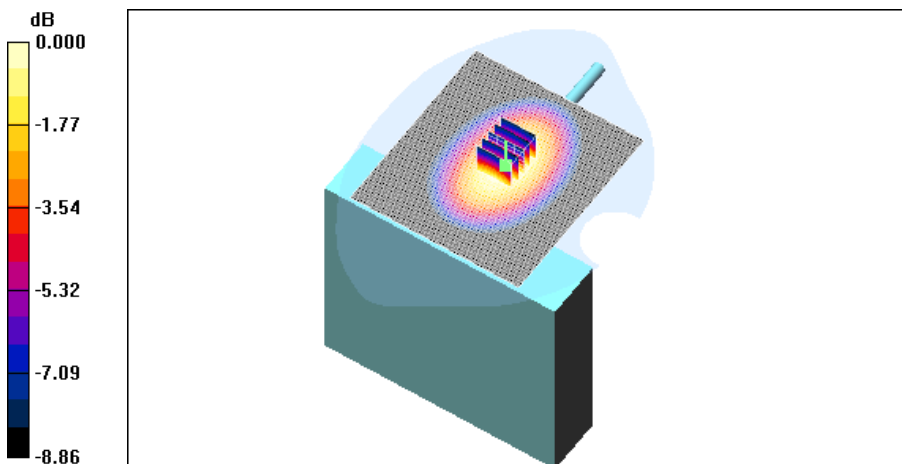
Reference Value = 30.0 V/m; Power Drift = 0.024 dB

Peak SAR (extrapolated) = 1.04 W/kg

**SAR(1 g) = 0.807 mW/g; SAR(10 g) = 0.577 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.860 mW/g



0 dB = 0.860mW/g

Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 848.31 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 848.31$  MHz;  $\sigma = 1$  mho/m;  $\epsilon_r = 55.6$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 0mm (Fix Surface) Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 777/Z Scan (1x1x31):** Measurement grid: dx=20mm, dy=20mm, dz=5mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.939 mW/g

**Body CDMA 777/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.952 mW/g

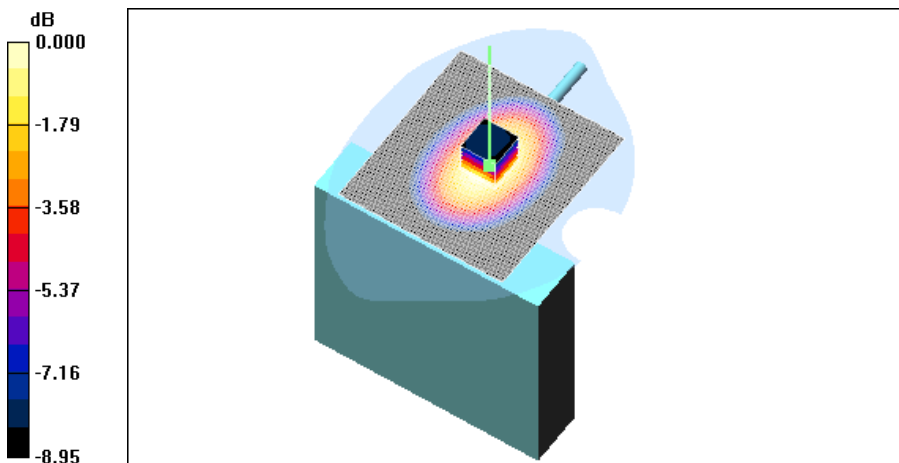
**Body CDMA 777/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 32.0 V/m; Power Drift = -0.122 dB

Peak SAR (extrapolated) = 1.14 W/kg

**SAR(1 g) = 0.891 mW/g; SAR(10 g) = 0.642 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)



0 dB = 0.939mW/g

Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008  
Option: EVDO

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 824.7 MHz; Duty Cycle: 1:1  
Medium parameters used:  $f = 825$  MHz;  $\sigma = 0.979$  mho/m;  $\epsilon_r = 55.9$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 1013/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (interpolated) = 0.914 mW/g

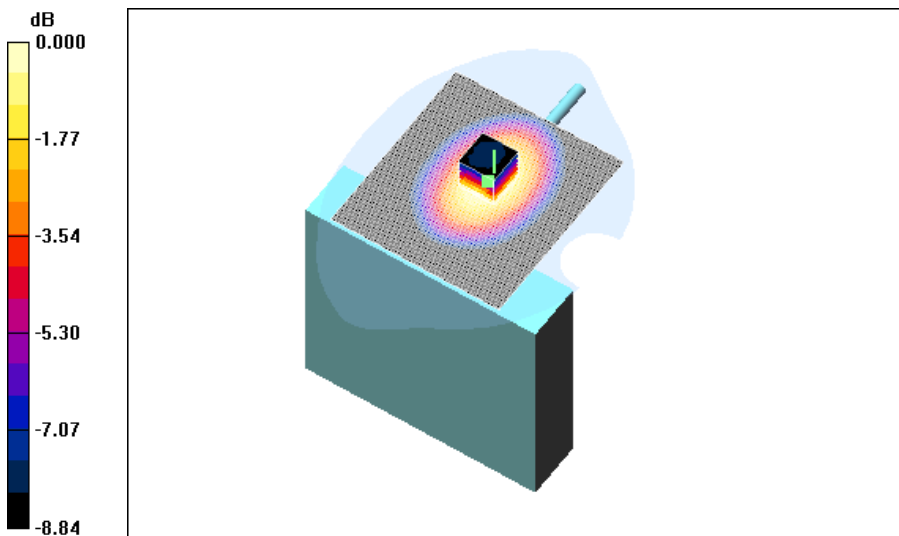
**Body CDMA 1013/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 29.8 V/m; Power Drift = 0.032 dB

Peak SAR (extrapolated) = 1.09 W/kg

**SAR(1 g) = 0.839 mW/g; SAR(10 g) = 0.600 mW/g**

Maximum value of SAR (measured) = 0.903 mW/g



0 dB = 0.903mW/g

Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008  
Option: EVDO

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 836.52 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 836.52$  MHz;  $\sigma = 0.993$  mho/m;  $\epsilon_r = 55.7$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 384/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.820 mW/g

**Body CDMA 384/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

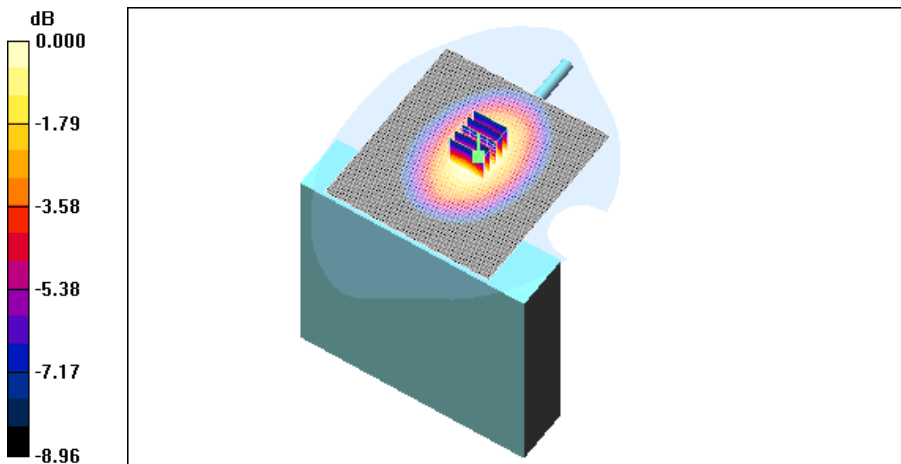
Reference Value = 28.5 V/m; Power Drift = 0.111 dB

Peak SAR (extrapolated) = 1.04 W/kg

**SAR(1 g) = 0.801 mW/g; SAR(10 g) = 0.573 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.854 mW/g



Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008  
Option: EVDO

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 848.31 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 848.31$  MHz;  $\sigma = 1$  mho/m;  $\epsilon_r = 55.6$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 777/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.936 mW/g

**Body CDMA 777/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

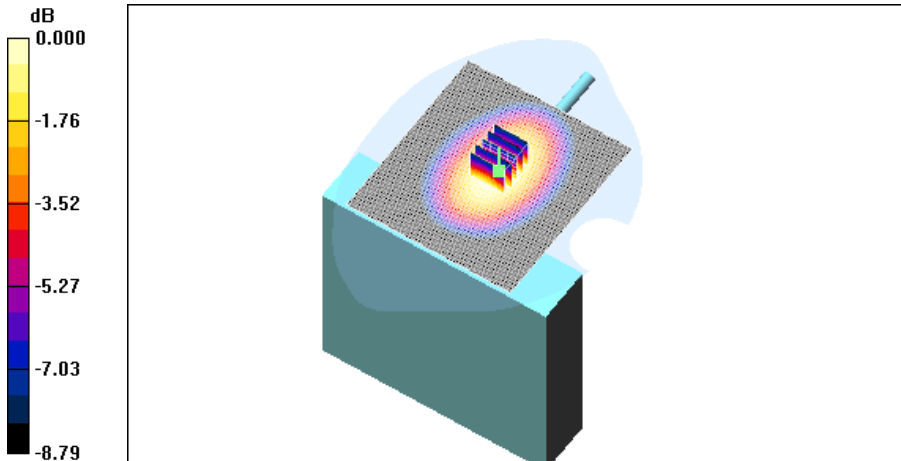
Reference Value = 30.7 V/m; Power Drift = -0.045 dB

Peak SAR (extrapolated) = 1.12 W/kg

**SAR(1 g) = 0.873 mW/g; SAR(10 g) = 0.630 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.920 mW/g



Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008  
Option: Without Charger

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 848.31 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 848.31$  MHz;  $\sigma = 1$  mho/m;  $\epsilon_r = 55.6$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Body CDMA 777/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.930 mW/g

**Body CDMA 777/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

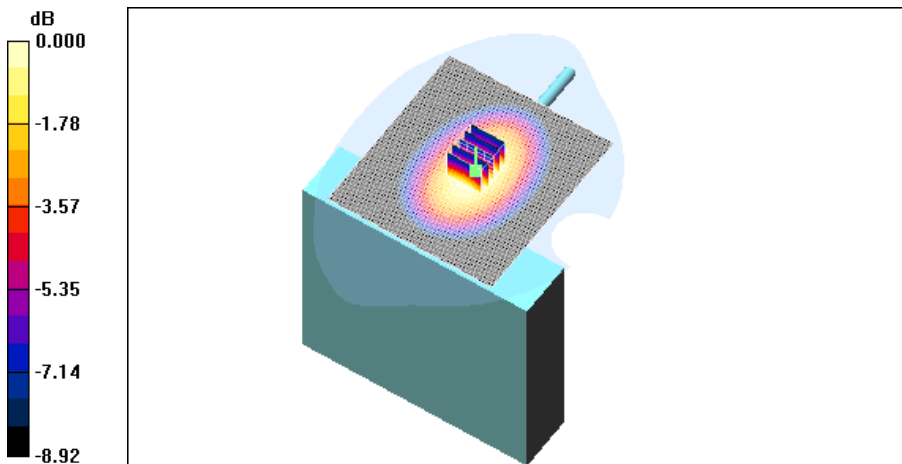
Reference Value = 32.0 V/m; Power Drift = -0.123 dB

Peak SAR (extrapolated) = 1.15 W/kg

**SAR(1 g) = 0.885 mW/g; SAR(10 g) = 0.636 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.937 mW/g



Test Laboratory: HCT CO., LTD  
EUT Type: 800 MHz WLL Telephone  
Liquid Temperature: 21.2 °C  
Ambient Temperature: 21.4 °C  
Test Date: July 21, 2008

**DUT: PV520; Type: WLL Phone; Serial:#1**

Communication System: CDMA 835MHz FCC; Frequency: 848.31 MHz; Duty Cycle: 1:1  
Medium parameters used (interpolated):  $f = 848.31$  MHz;  $\sigma = 1$  mho/m;  $\epsilon_r = 55.6$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

## DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.29, 6.29, 6.29); Calibrated: 2008-03-20
- Sensor-Surface: 0mm (Fix Surface) Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phamtom ; Type: SAM

**Body CDMA 777/Z Scan (1x1x31):** Measurement grid: dx=20mm, dy=20mm, dz=5mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (measured) = 0.939 mW/g

**Body CDMA 777/Area Scan (101x111x1):** Measurement grid: dx=15mm, dy=15mm

[Info: Interpolated medium parameters used for SAR evaluation.](#)

Maximum value of SAR (interpolated) = 0.952 mW/g

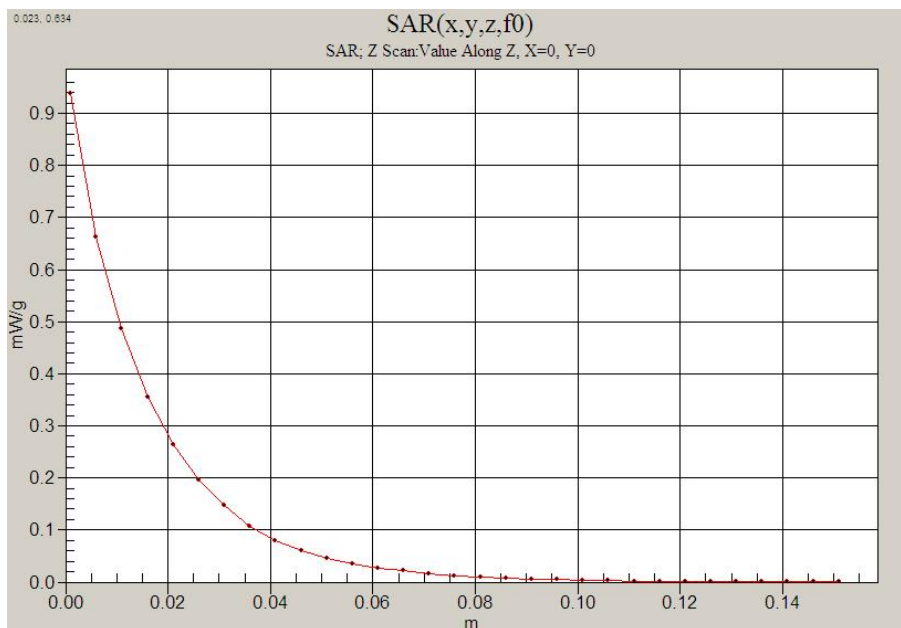
**Body CDMA 777/Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 32.0 V/m; Power Drift = -0.122 dB

Peak SAR (extrapolated) = 1.14 W/kg

**SAR(1 g) = 0.891 mW/g; SAR(10 g) = 0.642 mW/g**

[Info: Interpolated medium parameters used for SAR evaluation.](#)



## Attachment 2. – Dipole Validation Plots



## ■ Validation Data (835 MHz Head)

Test Laboratory: HCT CO., LTD  
Input Power 1W (30dBm)  
Liquid Temp: 21.2 °C  
Test Date: July 21, 2008

DUT: Dipole 835 MHz; Serial: D835V2 - SN:441

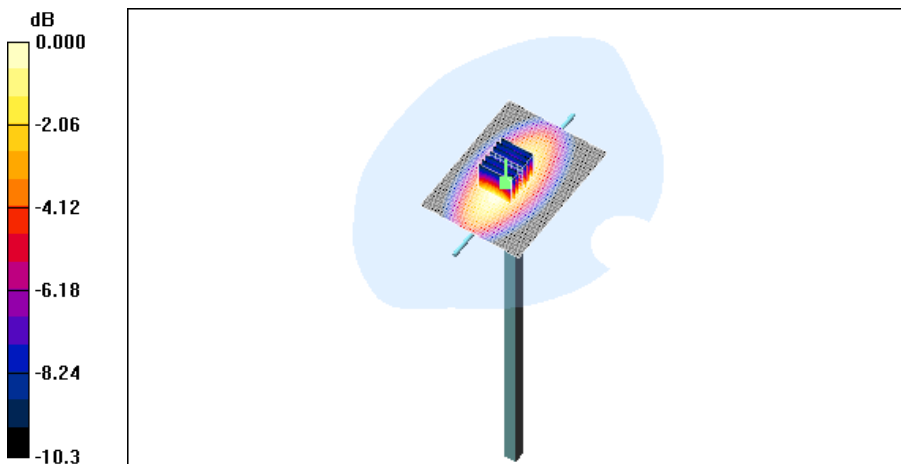
Communication System: CW; Frequency: 835 MHz; Duty Cycle: 1:1  
Medium parameters used:  $f = 835$  MHz;  $\sigma = 0.868$  mho/m;  $\epsilon_r = 41.2$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section ; Measurement SW: DASY4, V4.6 Build 23; Postprocessing SW: SEMCAD, V1.8 Build 176

DASY4 Configuration:

- Probe: ET3DV6 - SN1798; ConvF(6.79, 6.79, 6.79); Calibrated: 2008-03-20
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn447; Calibrated: 2007-09-13
- Phantom: 835/900 Phantom ; Type: SAM

**Validation 835 MHz/Area Scan (61x81x1):** Measurement grid: dx=15mm, dy=15mm  
Maximum value of SAR (interpolated) = 10.4 mW/g

**Validation 835 MHz/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm  
Reference Value = 111.7 V/m; Power Drift = 0.023 dB  
Peak SAR (extrapolated) = 13.9 W/kg  
**SAR(1 g) = 9.53 mW/g; SAR(10 g) = 6.25 mW/g**  
Maximum value of SAR (measured) = 10.3 mW/g



0 dB = 10.3mW/g

**■ Dielectric Parameter (835 MHz Head)**

Title PV520  
SubTitle CDMA835(Head)  
Test Date July 21, 2008

Frequency	e'	e''
800000000	41.6354	18.7298
805000000	41.5623	18.7029
810000000	41.4912	18.7188
815000000	41.4357	18.7091
820000000	41.3434	18.6778
825000000	41.3087	18.6789
830000000	41.2705	18.7020
835000000	41.2036	18.6753
840000000	41.1567	18.7164
845000000	41.1522	18.6831
850000000	41.1125	18.6702
855000000	41.1073	18.7042
860000000	41.1257	18.6390
865000000	41.0528	18.6461
870000000	41.0332	18.6582
875000000	41.0359	18.6234
880000000	40.9469	18.6004
885000000	40.9398	18.5290
890000000	40.8425	18.5393
895000000	40.7900	18.4624
900000000	40.6836	18.5009

**■ Dielectric Parameter (835 MHz Body)**

Title PV520  
SubTitle CDMA835(Body)  
Test Date July 21, 2008

Frequency	e'	e''
800000000	56.2829	21.4786
805000000	56.2352	21.4386
810000000	56.1510	21.4353
815000000	56.0616	21.3833
820000000	55.9957	21.3909
825000000	55.8808	21.3385
830000000	55.8280	21.3585
835000000	55.7759	21.3616
840000000	55.6549	21.2968
845000000	55.6610	21.2727
850000000	55.5912	21.2776
855000000	55.5285	21.2691
860000000	55.4254	21.2656
865000000	55.3945	21.2344
870000000	55.2921	21.2530
875000000	55.2752	21.2114
880000000	55.2534	21.1827
885000000	55.1917	21.1593
890000000	55.1632	21.1230
895000000	55.0634	21.0786
900000000	55.0429	21.0451

## Attachment 3. – Probe Calibration Data

**Calibration Laboratory of  
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Zeughausstrasse 43, 8004 Zurich, Switzerland



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Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 108**

Client **HCT (Dymstec)**

Certificate No: **ET3-1798\_Mar08**

**CALIBRATION CERTIFICATE**

Object: **ET3DV6 - SN:1798**

Calibration procedure(s): **QA CAL-01.v6  
Calibration procedure for dosimetric E-field probes**

Calibration date: **March 20, 2008**

Condition of the calibrated item: **In Tolerance**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).  
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	29-Mar-07 (METAS, No. 217-00670)	Mar-08
Power sensor E4412A	MY41495277	29-Mar-07 (METAS, No. 217-00670)	Mar-08
Power sensor E4412A	MY41498087	29-Mar-07 (METAS, No. 217-00670)	Mar-08
Reference 3 dB Attenuator	SN: S5054 (3c)	8-Aug-07 (METAS, No. 217-00719)	Aug-08
Reference 20 dB Attenuator	SN: S5086 (20b)	29-Mar-07 (METAS, No. 217-00671)	Mar-08
Reference 30 dB Attenuator	SN: S5129 (30b)	8-Aug-07 (METAS, No. 217-00720)	Aug-08
Reference Probe ES3DV2	SN: 3013	2-Jan-08 (SPEAG, No. ES3-3013_Jan08)	Jan-09
DAE4	SN: 654	20-Apr-07 (SPEAG, No. DAE4-654_Apr07)	Apr-08
Secondary Standards	ID #	Check Date (In house)	Scheduled Check
RF generator HP 8648C	US3642UD1700	4-Aug-99 (SPEAG, in house check Oct-07)	In house check: Oct-09
Network Analyzer HP 8753E	US37390585	18-Oct-01 (SPEAG, in house check Oct-07)	In house check: Oct-08

Calibrated by:	Name: <b>Katja Pokovic</b>	Function: <b>Technical Manager</b>	Signature:
Approved by:	Name: <b>Niels Kuster</b>	Function: <b>Quality Manager</b>	Signature:

Issued: March 21, 2008

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Accreditation No.: **SCS 108**

**Glossary:**

TSL	tissue simulating liquid
NORM <sub>x,y,z</sub>	sensitivity in free space
ConvF	sensitivity in TSL / NORM <sub>x,y,z</sub>
DCP	diode compression point
Polarization $\varphi$	$\varphi$ rotation around probe axis
Polarization $\vartheta$	$\vartheta$ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis

**Calibration is Performed According to the Following Standards:**

- IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005

**Methods Applied and Interpretation of Parameters:**

- NORM<sub>x,y,z</sub>:** Assessed for E-field polarization  $\vartheta = 0$  ( $f \leq 900$  MHz in TEM-cell;  $f > 1800$  MHz: R22 waveguide). NORM<sub>x,y,z</sub> are only intermediate values, i.e., the uncertainties of NORM<sub>x,y,z</sub> does not effect the E<sup>2</sup>-field uncertainty inside TSL (see below ConvF).
- NORM(f)<sub>x,y,z</sub> = NORM<sub>x,y,z</sub> \* frequency\_response** (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP<sub>x,y,z</sub>:** DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- ConvF and Boundary Effect Parameters:** Assessed in flat phantom using E-field (or Temperature Transfer Standard for  $f \leq 800$  MHz) and inside waveguide using analytical field distributions based on power measurements for  $f > 800$  MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM<sub>x,y,z</sub> \* ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from  $\pm 50$  MHz to  $\pm 100$  MHz.
- Spherical isotropy (3D deviation from isotropy):** in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset:** The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.

**ET3DV6 SN:1798**

**March 20, 2008**

# Probe ET3DV6

## SN:1798

Manufactured:	August 14, 2003
Last calibrated:	August 25, 2006
Recalibrated:	March 20, 2008

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

ET3DV6 SN:1798

March 20, 2008

**DASY - Parameters of Probe: ET3DV6 SN:1798**

Sensitivity in Free Space<sup>A</sup>

Diode Compression<sup>B</sup>

NormX	1.97 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP X	93 mV
NormY	1.84 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP Y	93 mV
NormZ	2.00 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP Z	94 mV

Sensitivity in Tissue Simulating Liquid (Conversion Factors)

Please see Page 8.

Boundary Effect

TSL                    900 MHz    Typical SAR gradient: 5 % per mm

Sensor Center to Phantom Surface Distance		3.7 mm	4.7 mm
SAR <sub>iso</sub> [%]	Without Correction Algorithm	9.5	5.7
SAR <sub>iso</sub> [%]	With Correction Algorithm	0.8	0.7

TSL                    1810 MHz    Typical SAR gradient: 10 % per mm

Sensor Center to Phantom Surface Distance		3.7 mm	4.7 mm
SAR <sub>iso</sub> [%]	Without Correction Algorithm	12.4	7.8
SAR <sub>iso</sub> [%]	With Correction Algorithm	0.9	0.8

Sensor Offset

Probe Tip to Sensor Center                    2.7 mm

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor k=2, which for a normal distribution corresponds to a coverage probability of approximately 95%.

<sup>A</sup> The uncertainties of NormX,Y,Z do not affect the E<sup>2</sup>-field uncertainty inside TSL (see Page 8).

<sup>B</sup> Numerical linearization parameter: uncertainty not required.

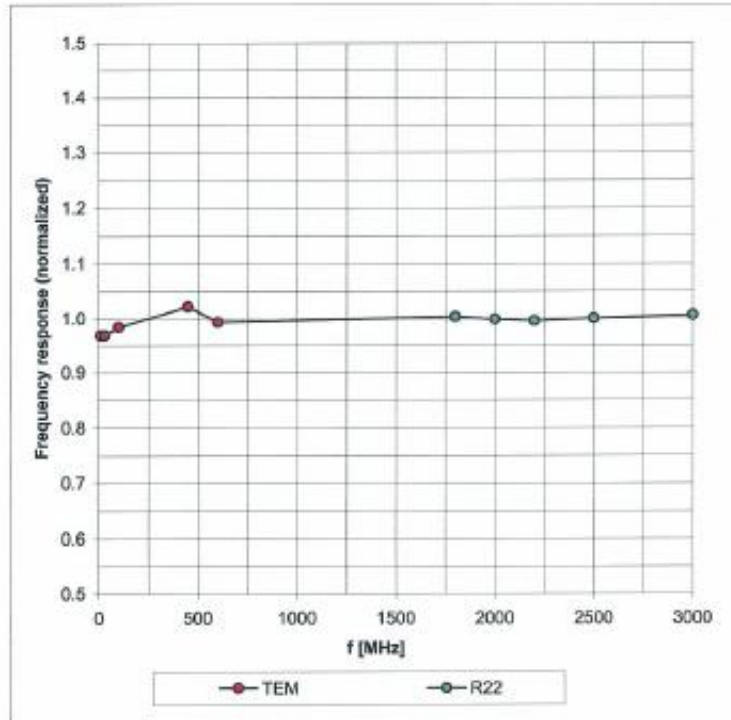


ET3DV6 SN:1798

March 20, 2008

### Frequency Response of E-Field

(TEM-Cell:ifi110 EXX, Waveguide: R22)

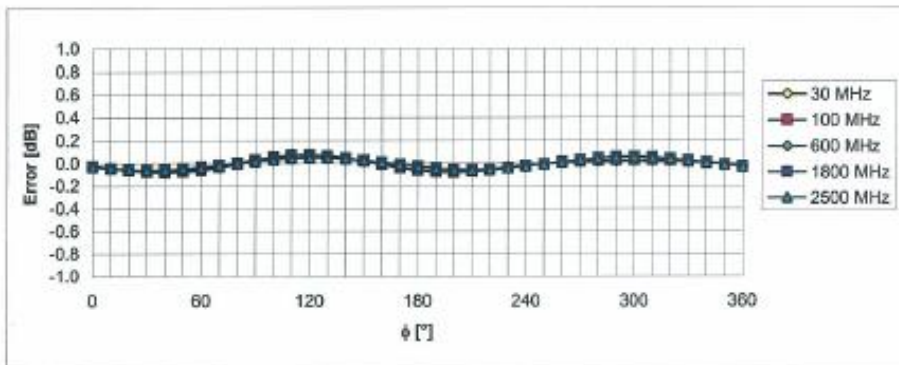
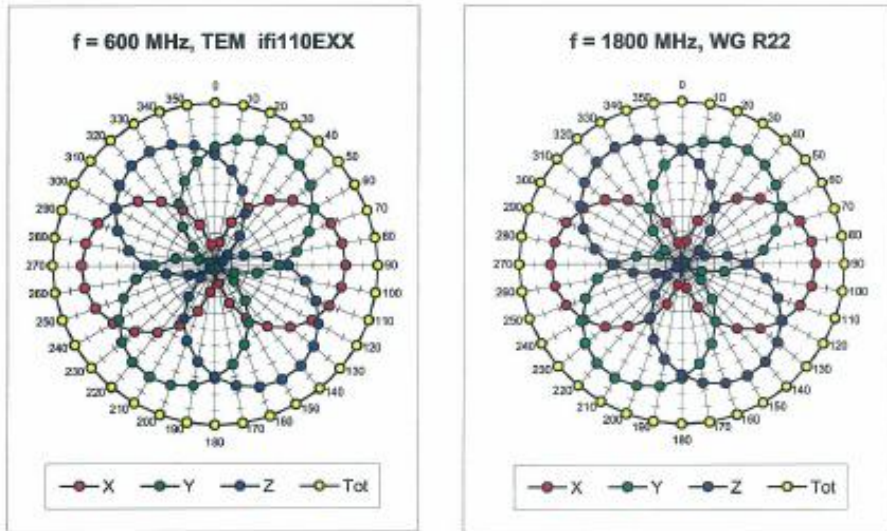


Uncertainty of Frequency Response of E-field:  $\pm 6.3\%$  ( $k=2$ )

ET3DV6 SN:1798

March 20, 2008

**Receiving Pattern ( $\phi$ ),  $\theta = 0^\circ$**

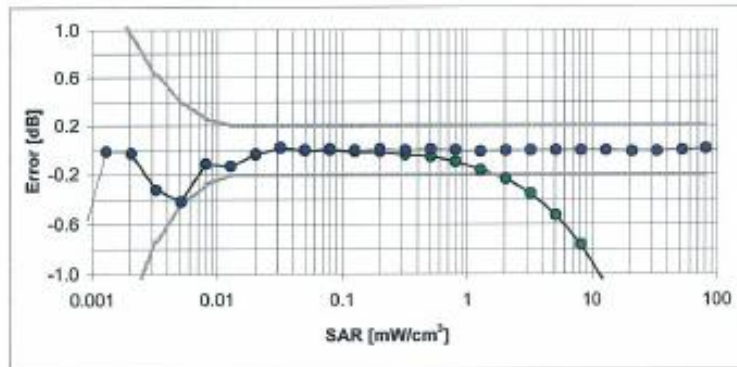
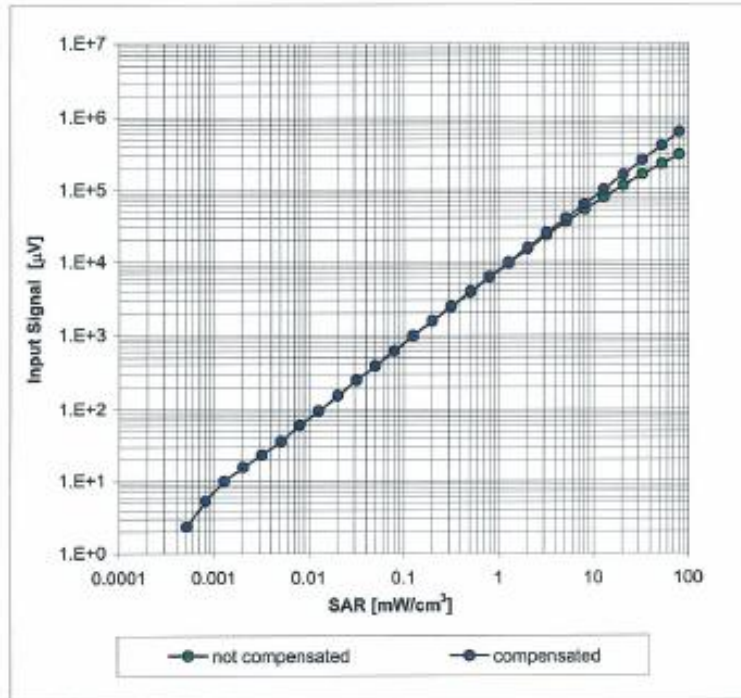


Uncertainty of Axial Isotropy Assessment:  $\pm 0.5\%$  (k=2)

ET3DV6 SN:1798

March 20, 2008

**Dynamic Range f(SAR<sub>head</sub>)**  
(Waveguide R22, f = 1800 MHz)

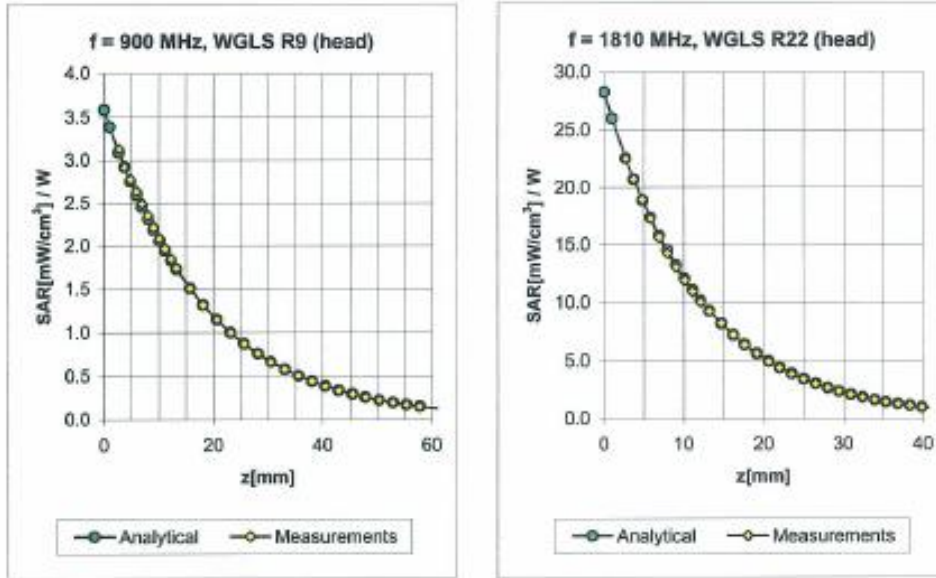


Uncertainty of Linearity Assessment: ± 0.6% (k=2)

ET3DV6 SN:1798

March 20, 2008

### Conversion Factor Assessment



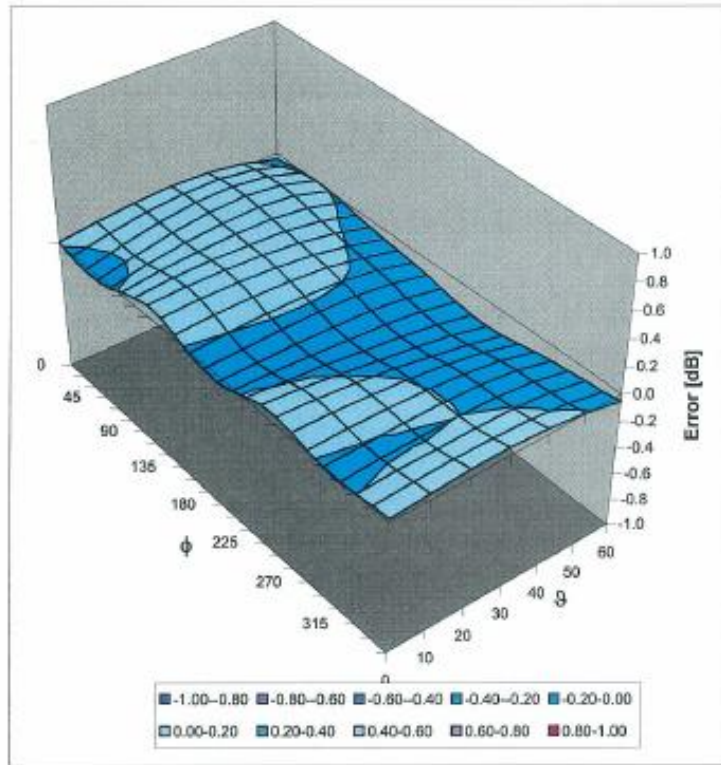
f [MHz]	Validity [MHz] <sup>c</sup>	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
900	± 50 / ± 100	Head	41.5 ± 5%	0.97 ± 5%	0.78	1.68	6.79 ± 11.0% (k=2)
1810	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.50	2.40	5.58 ± 11.0% (k=2)
1950	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.48	2.50	5.24 ± 11.0% (k=2)
2450	± 50 / ± 100	Head	39.2 ± 5%	1.80 ± 5%	0.95	1.40	4.81 ± 11.8% (k=2)
835	± 50 / ± 100	Body	55.2 ± 5%	0.97 ± 5%	0.92	1.59	6.29 ± 11.0% (k=2)
1810	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.53	2.31	5.38 ± 11.0% (k=2)
2450	± 50 / ± 100	Body	52.7 ± 5%	1.95 ± 5%	0.73	1.76	4.32 ± 11.8% (k=2)

<sup>c</sup> The validity of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2). The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band.

ET3DV6 SN:1798

March 20, 2008

### Deviation from Isotropy in HSL Error ( $\phi$ , $\theta$ ), $f = 900$ MHz



Uncertainty of Spherical Isotropy Assessment:  $\pm 2.6\%$  ( $k=2$ )

## Attachment 4. – Dipole Calibration Data

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Accreditation No.: **SCS 108**

Client **HCT (Dymstec)**

Certificate No: **D835V2-441\_May08**

**CALIBRATION CERTIFICATE**

Object: **D835V2 - SN: 441**

Calibration procedure(s): **QA CAL-05.v7  
Calibration procedure for dipole validation kits**

Calibration date: **May 19, 2008**

Condition of the calibrated item: **In Tolerance**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).  
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter EPM-442A	GB37480704	04-Oct-07 (METAS, No. 217-00736)	Oct-08
Power sensor HP 8481A	US37292783	04-Oct-07 (METAS, No. 217-00736)	Oct-08
Reference 20 dB Attenuator	SN: 5086 (20g)	07-Aug-07 (METAS, No 217-00718)	Aug-08
Type-N mismatch combination	SN: 5047.2 / 06327	08-Aug-07 (No. 217-00721)	Aug-08
Reference Probe ES3DV2	SN: 3025	28-Apr-08 (No. ES3-3025_Apr08)	Apr-09
DAE4	SN: 601	14-Mar-08 (No. DAE4-601_Mar08)	Mar-09
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power sensor HP 8481A	MY41092317	18-Oct-02 (SPEAG, in house check Oct-07)	In house check: Oct-09
RF generator R&S SMT-06	100005	04-Aug-99 (SPEAG, in house check Oct-07)	In house check: Oct-09
Network Analyzer HP 8753E	US37390585 S4206	18-Oct-01 (SPEAG, in house check Oct-07)	In house check: Oct-08

	Name	Function	Signature
Calibrated by:	Claudio Leubler	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: May 20, 2008

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Accreditation No.: **SCS 108**

**Glossary:**

TSL tissue simulating liquid  
ConvF sensitivity in TSL / NORM x,y,z  
N/A not applicable or not measured

**Calibration is Performed According to the Following Standards:**

- a) IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005
- c) Federal Communications Commission Office of Engineering & Technology (FCC OET), "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields; Additional Information for Evaluating Compliance of Mobile and Portable Devices with FCC Limits for Human Exposure to Radiofrequency Emissions", Supplement C (Edition 01-01) to Bulletin 65

**Additional Documentation:**

- d) DASY4/5 System Handbook

**Methods Applied and Interpretation of Parameters:**

- *Measurement Conditions:* Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- *Antenna Parameters with TSL:* The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- *Feed Point Impedance and Return Loss:* These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- *Electrical Delay:* One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- *SAR measured:* SAR measured at the stated antenna input power.
- *SAR normalized:* SAR as measured, normalized to an input power of 1 W at the antenna connector.
- *SAR for nominal TSL parameters:* The measured TSL parameters are used to calculate the nominal SAR result..



### Measurement Conditions

DASY system configuration, as far as not given on page 1.

<b>DASY Version</b>	DASY4	V4.7
<b>Extrapolation</b>	Advanced Extrapolation	
<b>Phantom</b>	Modular Flat Phantom V4.9	
<b>Distance Dipole Center - TSL</b>	15 mm	with Spacer
<b>Zoom Scan Resolution</b>	dx, dy, dz = 5 mm	
<b>Frequency</b>	835 MHz ± 1 MHz	

### Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
<b>Nominal Head TSL parameters</b>	22.0 °C	41.5	0.90 mho/m
<b>Measured Head TSL parameters</b>	(22.0 ± 0.2) °C	41.1 ± 6 %	0.91 mho/m ± 6 %
<b>Head TSL temperature during test</b>	(21.5 ± 0.2) °C	---	---

### SAR result with Head TSL

SAR averaged over 1 cm <sup>3</sup> (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	2.32 mW / g
SAR normalized	normalized to 1W	9.28 mW / g
SAR for nominal Head TSL parameters <sup>1</sup>	normalized to 1W	<b>9.17 mW / g ± 17.0 % (k=2)</b>

SAR averaged over 10 cm <sup>3</sup> (10 g) of Head TSL	condition	
SAR measured	250 mW input power	1.53 mW / g
SAR normalized	normalized to 1W	6.12 mW / g
SAR for nominal Head TSL parameters <sup>1</sup>	normalized to 1W	<b>6.07 mW / g ± 16.5 % (k=2)</b>

<sup>1</sup> Correction to nominal TSL parameters according to d), chapter "SAR Sensitivities"

**Appendix****Antenna Parameters with Head TSL**

Impedance, transformed to feed point	50.4 $\Omega$ - 7.6 $j\Omega$
Return Loss	-22.4 dB

**General Antenna Parameters and Design**

Electrical Delay (one direction)	1.377 ns
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After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

**Additional EUT Data**

Manufactured by	SPEAG
Manufactured on	March 09, 2001

**DASY4 Validation Report for Head TSL**

Date/Time: 19.05.2008 12:17:50

Test Laboratory: SPEAG, Zurich, Switzerland

**DUT: Dipole 835 MHz; Type: D835V2; Serial: D835V2 - SN:441**

Communication System: CW-835; Frequency: 835 MHz; Duty Cycle: 1:1

Medium: HSL 900 MHz;

Medium parameters used:  $f = 835$  MHz;  $\sigma = 0.909$  mho/m;  $\epsilon_r = 41.9$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASY4 (High Precision Assessment)

**DASY4 Configuration:**

- Probe: ES3DV2 - SN3025; ConvF(5.97, 5.97, 5.97); Calibrated: 28.04.2008
- Sensor-Surface: 3.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 14.03.2008
- Phantom: Flat Phantom 4.9L; Type: QD000P49AA; ;
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

**Pin=250mW; dip=15mm; dist=3.4mm/Zoom Scan (7x7x7)/Cube 0:**

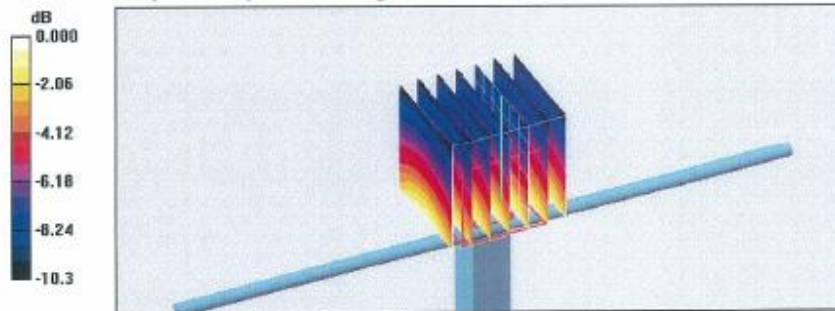
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 55.1 V/m; Power Drift = -0.008 dB

Peak SAR (extrapolated) = 3.38 W/kg

**SAR(1 g) = 2.32 mW/g; SAR(10 g) = 1.53 mW/g**

Maximum value of SAR (measured) = 2.62 mW/g



**Impedance Measurement Plot for Head TSL**

