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CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

Applicant Name:
NextNet Wireless, Inc.
2900 County Road 42 West
Burnsville, MN 55337
USA

Date of Testing:
3/1/2007- 03/07/2007
Test Site/Location:
PCTEST Lab, Columbia, MD, USA
Test Report Serial No.:
0702210094.PHX

FCC ID:	**PHX-PCC2510**
APPLICANT:	**NEXTNET WIRELESS, INC.**

EUT Type:	BRS/ EBS Band PC Card
Application Type:	Certification
FCC Rule Part(s):	§2.1093, §27, FCC/OET Bulletin 65 Supplement C [July 2001]
FCC Classification:	PCS Licensed Transmitter (PCB)
Model(s):	PCC-2510
Tx Frequency:	2496 - 2690 MHz
Conducted Power:	1.6 W (Duty Cycle 9.09%); 32.041 dBm conducted
Max. SAR Measurement:	0.374 W/kg

Test Device Serial No.: [S/N: 04194715]

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-2005 and has been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528-2003.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.

Randy Ortanez
President

ACCREDITED
TESTING LABORATORY
CERTIFICATE #2041.01

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1 INTRODUCTION

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency (RF) 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.[1]

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* ©2005 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [3] is used for guidance in measuring the Specific Absorption Rate (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 International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. 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.

1.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 1-1).

Equation 1-1
SAR Mathematical Equation

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

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

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

where:

σ = conductivity of the tissue-simulating material (S/m)
ρ = mass density of the tissue-simulating material (kg/m^3)
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 relation 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.[6]

2 TEST SITE LOCATION

2.1 INTRODUCTION

The map at the right shows the location of the PCTEST LABORATORY in Columbia, Maryland. It is in proximity to the FCC Laboratory, the Baltimore-Washington International (BWI) airport, the city of Baltimore and Washington, DC (See Figure 2-1).

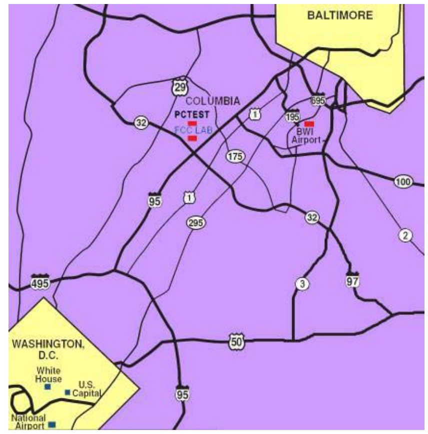
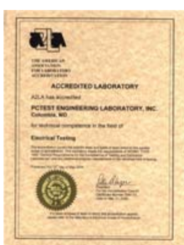


Figure 2-1
Map of the Greater Baltimore and Metropolitan Washington, D.C. area

These measurement tests were conducted at the PCTEST Engineering Laboratory, Inc. facility in New Concept Business Park, Guilford Industrial Park, Columbia, Maryland. The site address is 6660-B Dobbin Road, Columbia, MD 21045. The test site is one of the highest points in the Columbia area with an elevation of 390 feet above mean sea level. The site coordinates are 39° 11'15" N latitude and 76° 49' 38" W longitude. The facility is 1.5 miles north of the FCC laboratory, and the ambient signal and ambient signal strength are approximately equal to those of the FCC laboratory. There are no FM or TV transmitters within 15 miles of the site. The detailed description of the measurement facility was found to be in compliance with the requirements of § 2.948 according to ANSI C63.4 on January 27, 2006 and Industry Canada.

2.2 Test Facility / Accreditations:

Measurements were performed at an independent accredited PCTEST Engineering Lab located in Columbia, MD 21045, U.S.A.



- PCTEST Lab is accredited to ISO 17025-2005 by the American Association for Laboratory Accreditation (A2LA) in Specific Absorption Rate (SAR) testing, Hearing-Aid Compatibility (HAC), CTIA Test Plans, and wireless testing for FCC and Industry Canada Rules.
- PCTEST Lab is accredited to ISO 17025 by U.S. National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP Lab code: 100431-0) in EMC, FCC and Telecommunications.
- PCTEST facility is an FCC registered (PCTEST Reg. No. 90864) test facility with the site description report on file and has met all the requirements specified in Section 2.948 of the FCC Rules and Industry Canada (IC-2451).
- PCTEST Lab is a recognized U.S. Conformity Assessment Body (CAB) in EMC and R&TTE (n.b. 0982) under the U.S.-EU Mutual Recognition Agreement (MRA).
- PCTEST TCB is a Telecommunication Certification Body (TCB) accredited to ISO/IEC Guide 65 by the American National Standards Institute (ANSI) in all scopes of FCC Rules and all Industry Canada Standards (RSS).

- PCTEST facility is an IC registered (IC-2451) test laboratory with the site description on file at Industry Canada.
- PCTEST is a CTIA Authorized Test Laboratory (CATL) for AMPS and CDMA, and EvDO mobile phones.
- PCTEST is a CTIA Authorized Test Laboratory (CATL) for Over-the-Air (OTA) Antenna Performance testing for AMPS, CDMA, GSM, GPRS, EGPRS, UMTS (W-CDMA), CDMA 1xEVDO Data, CDMA 1xRTT Data.

3 SAR MEASUREMENT SETUP

3.1 Robotic System

Measurements are performed using the DASY4 automated dosimetric assessment system. The DASY4 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Pentium 4 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).

3.2 System Hardware

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Gateway Pentium 4 2.53 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 that 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.

3.3 System Electronics

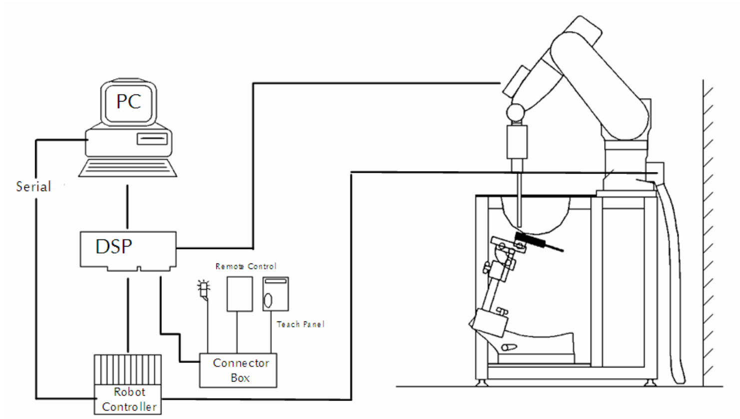


Figure 3-1
SAR Measurement System Setup

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 [7].

3.4 Automated Test System Specifications

<u>Positioner</u>

Robot:	Stäubli Unimation Corp. Robot RX60L
Repeatability:	0.02 mm
No. of Axes:	6

<u>Data Acquisition Electronic System (DAE)</u>

Cell Controller

Processor:	Pentium 4
Clock Speed:	2.53 GHz
Operating System:	Windows XP Professional

Data Converter

Features:	Signal Amplifier, multiplexer, A/D converter & control logic
Software:	DASY4, SEMCAD software
Connecting Lines:	Optical Downlink for data and status info Optical upload for commands and clock

<u>PC Interface Card</u>

Function:	166MHz low power Pentium MMX 32MB chipdisk Link to DAE 16-bit A/D converter for surface detection system Two Serial & Ethernet link to robotics Direct emergency stop output for robot

<u>Phantom</u>

Type:	SAM Twin Phantom (V4.0)
Shell Material:	Composite
Thickness:	2.0 ± 0.2 mm

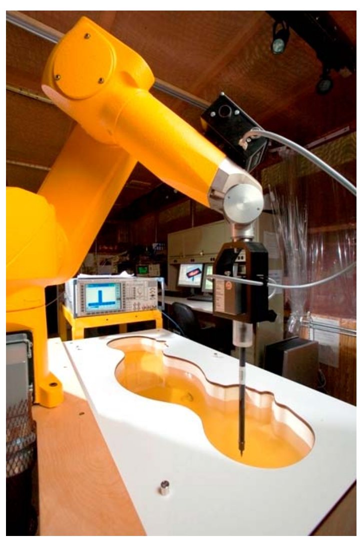


Figure 3-2
DASY4 SAR Measurement System

4 DASY E-FIELD PROBE SYSTEM

4.1 Probe Measurement System

Figure 4-1
SAR System

The SAR measurements were conducted with the dosimetric probe EX3DV4, designed in the classical triangular configuration [7] (see Figure 4-1) 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 multi-fiber line ending at the front of the probe tip (see Figure 4-2). 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 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 2nd order fitting (see Figure 5-1). The approach is stopped at reaching the maximum.

4.2 Probe Specifications

Model:	EX3DV4
Frequency Range:	10 MHz – 6.0 GHz
Calibration:	In brain and muscle simulating tissue at Frequencies from 835 up to 5800MHz
Linearity:	± 0.2 dB (30 MHz to 6 GHz)
Dynamic Range:	10 mW/kg – 100 W/kg
Probe Length:	330 mm
Probe Tip Length:	20 mm
Body Diameter:	12 mm
Tip Diameter:	2.5 mm
Tip-Center:	1 mm
Application:	SAR Dosimetry Testing
	Compliance tests of mobile phones

Figure 4-2
Near-Field Probe

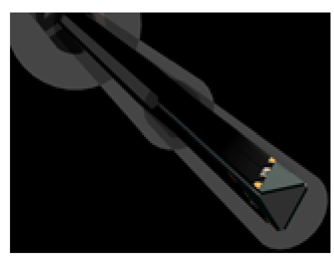


Figure 4-3
Triangular Probe Configuration

5 PROBE CALIBRATION PROCESS

5.1 Dosimetric Assessment Procedure

Each E-Probe/Probe amplifier combination has unique calibration parameters. A TEM cell calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm^2) using an RF Signal generator, TEM cell, and RF Power Meter.

5.2 Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies 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 rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm^2.

5.3 Temperature Assessment

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

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

where:

Δt = exposure time (30 seconds),
C = heat capacity of tissue (brain or muscle),
ΔT = temperature increase due to RF exposure.

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

where:

σ = simulated tissue conductivity,
ρ = Tissue density

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;

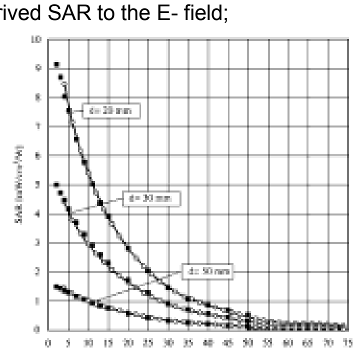


Figure 5-1 E-Field and Temperature measurements at 900MHz [7]

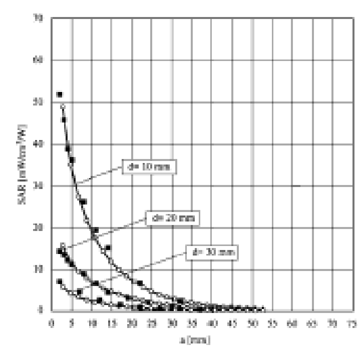


Figure 5-2 E-Field and temperature measurements at 1.9GHz [7]

6 PHANTOM AND EQUIVALENT TISSUES

6.1 SAM Phantoms

Figure 6-1
SAM Phantoms

The SAM Twin Phantom V4.0 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 [11][12]. 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.

6.2 Brain & Muscle Simulating Mixture Characterization

Figure 6-2
Head Simulated

The brain and muscle mixtures consist of a viscous gel using hydroxethylcellulose (HEC) gelling agent and saline solution (see Table 6-1). 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 head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 have been incorporated in the following table. Other head and body tissue parameters that have not been specified in IEEE-1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrove [13].(See Table 6-1)

Table 6-1
Composition of the Brain & Muscle Tissue Equivalent Matter*

Frequency (MHz)	300	450		835	900			1450	1800				1900		1950	2000	2100		2450		3000
Recipe #	1	1	3	1	1	2	3	1	1	2	2	3	1	2	4	1	1	2	2	3	2
Ingredients (% by weight)																					
1,2-Pro-panediol						64.81															
Bactericide	0.19	0.19	0.50	0.10	0.10		0.50					0.50								0.50	
Diacetin			48.90				49.20					49.43								49.75	
DGBE								45.41	47.00	13.84	44.92		44.94	13.84	45.00	50.00	50.00	7.99	7.99		7.99
HEC	0.98	0.98		1.00	1.00																
NaCl	5.95	3.95	1.70	1.45	1.48	0.79	1.10	0.67	0.36	0.35	0.18	0.64	0.18	0.35				0.16	0.16		0.16
Sucrose	55.32	56.32		57.00	56.50																
Triton X-100										30.45				30.45				19.97	19.97		19.97
Water	37.56	38.56	48.90	40.45	40.92	34.40	49.20	53.80	52.64	55.36	54.90	49.43	54.90	55.36	55.00	50.00	50.00	71.88	71.88	49.75	71.88
Measured dielectric parameters																					
ϵ_r'	46.00	43.4	44.3	41.6	41.2	41.8	42.7	40.9	39.3	41	40.4	39.2	39.9	41	40.1	37	36.8	41.1	40.3	39.2	37.9
σ(S/m)	0.86	0.85	0.9	0.9	0.98	0.97	0.99	1.21	1.39	1.38	1.4	1.4	1.42	1.38	1.41	1.4	1.51	1.55	1.88	1.82	2.46
Temp. (°C)	22	22	20	22	22	22	20	22	22	21	22	20	21	21	20	22	22	20	20	20	20
Target dielectric parameters (Table 2)																					
ϵ_r'	45.30	43.50		41.5	41.50			40.5	40.0								39.80		39.2		38.5
σ(S/m)	0.87	0.87		0.9	0.97			1.2	1.4								1.49		1.8		2.4
NOTE—Multiple columns for any single frequency are optional recipes. Recipe #, reference: 1 (Kanda et al. [B85]), 2 (Vigneras [B143]), 3 (Peyman and Gabriel [B119]), 4 (Fukunaga et al. [B50]).																					

*The formulas containing Triton X-100 and corresponding measured parameters are under review and verification.

* 2500-2700MHz liquid recipe is proprietary. Specifications according to *FCC Application Note for SAR Probe Calibration and System Verification Considerations for Measurements at 150 MHz – 3 GHz* [24]

7 DOSIMETRIC ASSESSMENT & PHANTOM SPECS

7.1 Measurement Procedure

The evaluation was performed using the following procedure:

1. The SAR measurement was taken at a selected spatial reference point to monitor power variations during testing. This fixed point was measured and used as a reference value.
2. The SAR distribution at the exposed side of the phantom was measured at a distance of 3.0mm from the inner surface of the shell. The horizontal grid spacing was 15mm x 15mm.
3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 32mm x 32mm x 30mm (fine resolution volume scan, zoom scan) 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 (see Figure 7-1):
   a. The data at the surface was extrapolated since the center of the dipoles is 2.7mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. The extrapolation was based on a least square algorithm [15]. A polynomial of the fourth order was calculated through the points in the z-axis. This polynomial was then used to evaluate the points between the surface and the probe tip.
   b. The maximum interpolated value was found with a software algorithm. Around this maximum, the SAR values averaged over the spatial volumes (1g or 10g) were computed using 3D-Spline interpolation. The 3D-spline is composed of three one-dimensional splines with the “Not a knot” condition (in x, y, and z directions) [15][16]. 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 reference value, at the same location as step 1, was re-measured to measure drift. If the value drifted by more than 5%, the evaluation was repeated.

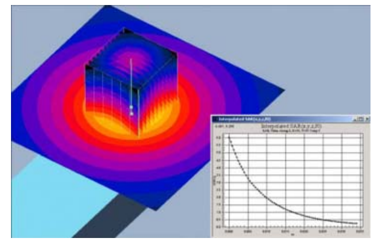


Figure 7-1
Sample SAR Area Scan

7.2 Specific Anthropomorphic Mannequin (SAM) Specifications

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Figure 7-2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.

Figure 7-2
SAM Twin Phantom Shell

8 TEST CONFIGURATION POSITIONS

8.1 SAR for Notebooks and Lap-touching Devices

Lap-touching devices that have transmitting antennas located less than 20 cm from the lap of the user require routine SAR evaluation. Such devices are considered portable and are capable of being held to the body. Devices are to be setup touching the phantom and are configured with maximum output power during SAR assessment for a worst-case SAR evaluation.

Figure 8-1
Notebook Setup for SAR

8.2 Integral Antenna PCMCIA and CompactFlash Cards

KDB 497522. Integral-antenna PCMCIA and CompactFlash radio cards are common module-like devices meant to be purchased and installed without tools or special skills by consumers. The common host configurations (platforms, categories) are notebook (laptop) computers with PCMCIA slot(s) in the keyboard section, and PDAs (personal digital assistants or palmtop computers). Integral-antenna radio cards installed in PDAs with body-worn and/or held-to-ear configurations, and in all notebook computers, must be evaluated under portable RF exposure conditions per 47 C.F.R. 2.1093(b). To better represent the range of near field topography and environment of various notebook and PDA hosts, SAR evaluation using a minimum of three hosts within each platform type (three PDAs, three notebooks, etc.) is recommended by FCC. Hosts shall be modern, current-market, and expected final installations for the PC Cards.

Figure 8-2
CompactFlash radio card in PDA host configuration

For notebook computers with multiple card slots (e.g., two stacked), RF exposure should be evaluated with the transmitter installed in the slot(s) producing the highest SAR (See Figure 8-3). The minimum number of positions that should be evaluated for notebook computers and body-worn PDAs are bottom-face in parallel and in contact (0 cm) with flat phantom, and device perpendicular to phantom with recommended spacing of 1.5 cm.

Figure 8-3
PCMCIA Radio Card in a notebook host configuration

8.3 Positioning for Convertible and Slate Tablet Computers

Figure 8-4
Tablet Computer Form Factors

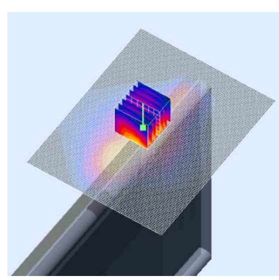


Figure 8-5
Tablet PC Body SAR

KDB 447498. Tablet (notepad) computers are tested in a lap-held position with the bottom of the computer in direct contact against a flat phantom for all user-enabled portrait and landscape positions.

9 4G POWER MEASUREMENTS

Power measurements were performed with software from the host laptop communication to the PC Card.

9.1 Procedures Used to Establish RF Signal for SAR

The device was placed into a simulated call using software in a shielded chamber. SAR measurements were taken with a fully charged battery. 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 Device Conducted Powers:

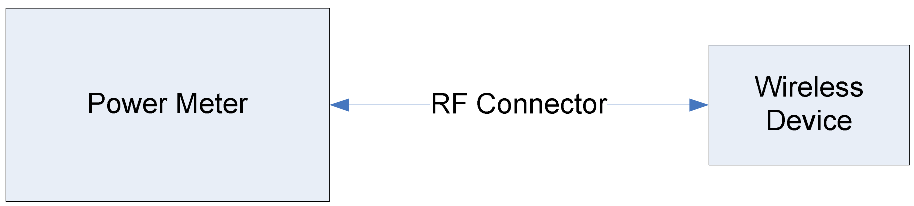


Figure 9-1
Power Measurement Setup

Channel	Freq (MHz)	Power [dBm]	Laptop
CH 1	2500	31.43	Toshiba Laptop
CH 2	2593	31.67	Toshiba Laptop
CH 3	2689	31.89	Toshiba Laptop
CH 1	2500	31.86	Fujitsu Laptop
CH 2	2593	31.52	Fujitsu Laptop
CH 3	2689	31.38	Fujitsu Laptop
CH 1	2500	31.93	HP Laptop
CH 2	2593	32.64	HP Laptop
CH 3	2689	32.59	HP Laptop

Notes:

Duty Cycle = 9.09 %
AGC = Default mode (calibrated level by manufacturer)

10 ANSI/IEEE C95.1-2005 RF EXPOSURE LIMITS

10.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

10.2 Controlled Environment

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). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 10-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-2005

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT *General Population* (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT *Occupational* (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20

The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2 The Spatial Average value of the SAR averaged over the whole body.
3 The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

11 MEASUREMENT UNCERTAINTIES

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	**IEEE 1528 Sec.**	**Tol. (± %)**	**Prob. Dist.**	**Div.**	**c_i 1gm**	**c_i 10 gms**	**1gm u_i (± %)**	**10gms u_i (± %)**	**v_i**
Measurement System									
Probe Calibration	E.2.1	6.6	N	1	1.0	1.0	6.6	6.6	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	1.0	1.0	1.3	1.3	∞
Boundary Effect	E.2.3	0.4	N	1	1.0	1.0	0.4	0.4	∞
Linearity	E.2.4	0.3	N	1	1.0	1.0	0.3	0.3	∞
System Detection Limits	E.2.5	5.1	N	1	1.0	1.0	5.1	5.1	∞
Readout Electronics	E.2.6	1.0	N	1	1.0	1.0	1.0	1.0	∞
Response Time	E.2.7	0.8	R	1.73	1.0	1.0	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1.0	1.0	1.5	1.5	∞
RF Ambient Conditions	E.6.1	3.0	R	1.73	1.0	1.0	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.4	R	1.73	1.0	1.0	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E.6.3	2.9	R	1.73	1.0	1.0	1.7	1.7	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	1.0	R	1.73	1.0	1.0	0.6	0.6	∞
Test Sample Related									
Test Sample Positioning	E.4.2	6.0	N	1	1.0	1.0	6.0	6.0	287
Device Holder Uncertainty	E.4.1	3.32	R	1.73	1.0	1.0	1.9	1.9	∞
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	1.73	1.0	1.0	2.9	2.9	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	4.0	R	1.73	1.0	1.0	2.3	2.3	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Conductivity - measurement uncertainty	E.3.3	3.8	N	1	0.64	0.43	2.4	1.6	6
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Liquid Permittivity - measurement uncertainty	E.3.3	4.5	N	1	0.60	0.49	2.7	2.2	6
Combined Standard Uncertainty (k=1)			RSS				12.4	12.0	299
Expanded Uncertainty (95% CONFIDENCE LEVEL)			k=2				24.7	24.0	

The above measurement uncertainties are according to IEEE Std. 1528-2003

12 SYSTEM VERIFICATION

12.1 Tissue Verification

Table 12-1
Measured Tissue Properties

Calibrated Date:	03/01/07					
	2.6 GHz Muscle					
	2500 MHz		2600 MHz		2700 MHz	
	Target	Measured	Target	Measured	Target	Measured
Dielectric Constant	52.64	51.58	52.51	51.24	52.38	50.94
Conductivity	2.02	1.91	2.16	2.03	2.30	2.17

12.2 Test System Verification

Prior to assessment, the system is verified to ±10% of the specifications at 2600 MHz by using the system validation kit. (Graphic Plots Attached)

Table 12-2
System Verification Results

System Verification TARGET & MEASURED							
Date:	**Amb. Temp (˚C)**	**Liquid Temp(˚C)**	**Input Power (W)**	**Tissue Frequency (Mhz)**	**Targeted SAR_{1g} (mW)**	**Measured SAR_{1g} (mW)**	**Deviation (%)**
03/01/07	22.8	21.2	0.025	2600 MHz	1.45	1.53	5.51%
03/02/07	23.1	21.5	0.025	2600 MHz	1.45	1.57	8.27%

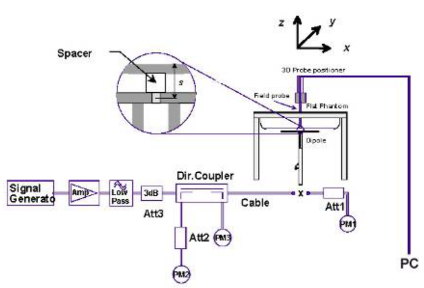


Figure 12-1
System Verification Setup Diagram

Figure 12-2
System Verification Setup Photo

13 SAR DATA SUMMARY

13.1 2600 MHz Body SAR/ HP Laptop PC

MEASUREMENT RESULTS										
FREQUENCY		Mode	Begin/ End Power [dBm]		Device Test Position	Spacing	Antenna Position	SAR (W/kg)	Drift (dB)	Cal SAR (W/kg)
MHz	Ch.		Start	End						
2500	1	4QAM	31.93	31.88	Laptop	1.4 cm	Close	0.172	-0.046	0.1738
2593	2	4QAM	32.64	32.46	Laptop	1.4 cm	Close	0.226	-0.181	0.2356
2689	3	4QAM	32.59	32.62	Laptop	1.4 cm	Close	0.217	0.031	0.2155
2500	1	4QAM	31.93	31.78	Laptop	1.4 cm	Up	0.181	-0.147	0.1872
2593	2	4QAM	32.65	32.65	Laptop	1.4 cm	Up	0.217	0.009	0.2165
2689	3	4QAM	32.59	32.57	Laptop	1.4 cm	Up	0.249	-0.016	**0.2499**
ANSI / IEEE C95.1 2005 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						**Muscle 1.6 W/kg (mW/g)** averaged over 1 gram				

NOTES:

1. The test data reported are the worst-case SAR value with the position set in a lap held configuration. Test procedures used are according to FCC/OET Bulletin 65, Supplement C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings.
4. Duty Cycle is 9.09 %
5. ‡Power Measured ☒ Conducted ☐ ERP ☐ EIRP
6. SAR Measurement System ☒ DASY4 ☐ IDX ☐
7. Phantom Configuration ☐ Left Head ☒ Flat Phantom ☐ Right Head
8. SAR Configuration ☐ Head ☒ Body ☐ Hand
9. Test Signal Call Mode ☒ Manufacturer Software ☐ Base Station Simulator

13.2 2600 MHz Body SAR/ Toshiba Laptop PC

MEASUREMENT RESULTS										
FREQUENCY		Mode	Begin/ End Power [dBm]		Device Test Position	Spacing	Antenna Position	SAR (W/Kg)	Drift (dB)	Cal SAR (W/kg)
MHz	Ch.		Start	End						
2500	1	4QAM	31.43	31.34	Laptop	0.9 cm	Close	0.161	-0.087	0.1643
2593	2	4QAM	31.67	31.50	Laptop	0.9 cm	Close	0.222	-0.169	0.2308
2689	3	4QAM	31.89	31.77	Laptop	0.9 cm	Close	0.259	-0.118	0.2661
2500	1	4QAM	31.43	31.46	Laptop	0.9 cm	Up	0.198	0.030	0.1966
2593	2	4QAM	31.67	31.67	Laptop	0.9 cm	Up	0.245	-0.005	0.2453
2689	3	4QAM	31.89	31.94	Laptop	0.9 cm	Up	**0.374**	0.050	0.3697
ANSI / IEEE C95.1 2005 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						**Muscle 1.6 W/kg (mW/g)** averaged over 1 gram				

NOTES:

1. The test data reported are the worst-case SAR value with the position set in a lap held configuration. Test procedures used are according to FCC/OET Bulletin 65, Supplement C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings.
4. Duty Cycle is 9.09 %
5. ‡Power Measured ☒ Conducted ☐ ERP ☐ EIRP
6. SAR Measurement System ☒ DASY4 ☐ IDX ☐
7. Phantom Configuration ☐ Left Head ☒ Flat Phantom ☐ Right Head
8. SAR Configuration ☐ Head ☒ Body ☐ Hand
9. Test Signal Call Mode ☒ Manufacturer Software ☐ Base Station Simulator

2600 MHz Body SAR/ Fujitsu Laptop PC

MEASUREMENT RESULTS										
FREQUENCY		Mode	Begin/ End Power [dBm]		Device Test Position	Spacing	Antenna Position	SAR (W/Kg)	Drift (dB)	Cal SAR (W/kg)
MHz	Ch.		Start	End						
2500	1	4QAM	31.86	31.74	Laptop	0.8 cm	Close	0.246	-0.122	0.2530
2593	2	4QAM	31.52	31.44	Laptop	0.8 cm	Close	0.238	-0.081	0.2425
2689	3	4QAM	31.38	31.16	Laptop	0.8 cm	Close	0.179	-0.217	0.1882
2500	1	4QAM	31.86	31.83	Laptop	0.8 cm	Up	0.264	-0.033	0.2660
2593	2	4QAM	31.52	31.60	Laptop	0.8 cm	Up	**0.262**	0.077	0.2574
2689	3	4QAM	31.38	31.64	Laptop	0.8 cm	Up	0.247	0.263	0.2325
ANSI / IEEE C95.1 2005 - SAFETY LIMIT **Spatial Peak** **Uncontrolled Exposure/General Population**						**Muscle** **1.6 W/kg (mW/g)** averaged over 1 gram				

NOTES:

1. The test data reported are the worst-case SAR value with the position set in a lap held configuration. Test procedures used are according to FCC/OET Bulletin 65, Supplement C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings.
4. Duty Cycle is 9.09 %
5. ‡Power Measured ☒ Conducted ☐ ERP ☐ EIRP
6. SAR Measurement System ☒ DASY4 ☐ IDX ☐
7. Phantom Configuration ☐ Left Head ☒ Flat Phantom ☐ Right Head
8. SAR Configuration ☐ Head ☒ Body ☐ Hand
9. Test Signal Call Mode ☒ Manufacturer Software ☐ Base Station Simulator

14 EQUIPMENT LIST

Manufacturer	Model / Equipment	Calibration Date	Cal Inerval	Calibration Due	Serial No.
Agilent	8753E (30kHz-6GHz) Network Analyzer	5/25/2006	Annual	5/25/2007	JP38020182
Agilent	N4010A Wireless Connectivity Test Set	6/11/2006	Annual	6/11/2007	GB46170464
Agilent	E5515C Wireless Communications Test Set	7/27/2006	Annual	7/27/2007	GB41450275
Agilent	E5515C Wireless Communications Test Set	10/6/2006	Annual	10/6/2007	GB43193972
Agilent	8648D (9kHz-4GHz) Signal Generator	10/1/2006	Annual	10/1/2007	3613A00315
Agilent	E5515C Wireless Communications Test Set	10/26/2006	Biennial	10/25/2008	GB46310798
Gigatronics	8657A Universal Power Meter	4/7/2006	Annual	4/7/2007	8650319
Gigatronics	80701A (0.05-18GHz) Power Sensor	4/11/2006	Annual	4/11/2007	1833460
Rohde & Schwarz	NRVS Power Meter	6/1/2005	Biennial	6/1/2007	835360/079
Rohde & Schwarz	NRV-Z53 Power Sensor	6/1/2005	Biennial	6/1/2007	846076/007
Rohde & Schwarz	CMU200 Base Station Simulator	11/8/2006	Annual	11/8/2007	107826
Rohde & Schwarz	CMU200 Base Station Simulator	7/26/2006	Annual	7/26/2007	833855/010
Rohde & Schwarz	CMU200 Base Station Simulator	4/20/2006	Annual	4/20/2007	836371/079
SPEAG	D1900V2 1900 MHz SAR Dipole	1/23/2007	Biennial	1/22/2009	502
SPEAG	D835V2 835MHz SAR Dipole	8/24/2005	Biennial	8/24/2007	4d026
SPEAG	D5GHzV2 5 GHz SAR Dipole	10/5/2005	Biennial	10/5/2007	1007
SPEAG	EX3DV4 SAR Probe	1/22/2007	Annual	1/22/2008	3550
SPEAG	DAE4	6/1/2006	Annual	6/1/2007	704
SPEAG	EX3DV4 SAR Probe	7/14/2006	Annual	7/14/2007	3589
SPEAG	DAE4	9/4/2006	Annual	9/4/2007	665
SPEAG	EX3DV4 SAR Probe	11/23/2006	Annual	11/23/2007	3561
SPEAG	ES3DV2 SAR Probe	9/20/2006	Annual	9/20/2007	3022
SPEAG	DAE3	10/16/2006	Annual	10/16/2007	455
SPEAG	DAE4	1/23/2007	Annual	1/23/2008	649
SPEAG	D2600V2 2600MHz SAR Dipole	1/5/2007	Annual	1/5/2008	1004
VWR	61161-274 Alarm Digital Thermometer	8/19/2006	Annual	8/19/2007	51280556
SPEAG	D835V2 835MHz SAR Dipole	1/8/2007	Biennial	1/7/2009	4d047
SPEAG	D1900V2 1900MHz SAR Dipole	1/23/2007	Biennial	1/22/2009	5d080
SPEAG	D2450V2 2450MHz SAR Dipole	1/17/2007	Biennial	1/16/2009	797
SPEAG	D5GHzV2 5GHz SAR Dipole	1/24/2007	Biennial	1/23/2009	1057

Notes:

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

15 CONCLUSION

15.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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