



M. Flom Associates, Inc.

International Compliance Testing Laboratory

3356 N. San Marcos Place, Suite 107
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Date: July 11, 2005

Federal Communications Commission
Via: Electronic Filing

Attention: Authorization & Evaluation Division

Applicant: Novatel Wireless Inc.
Equipment: Mini-Card EV620
FCC ID: PKRNVWEV620
FCC Rules: Radiofrequency Radiation Exposure Limits
47 CFR 1.1310
MPE - Mobiles X Fixed Based Station

Gentlemen:

On behalf of the Applicant, enclosed please find the Supplemental Test Data Report, the whole for Environmental Assessment (MPE) of the referenced equipment as shown.

We trust the same is in order. Should you need any further information, kindly contact the writer who is authorized to act as agent.

Sincerely yours,

Michael Schafer, General Manager

enclosure(s)
MS/del



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Environmental Assessment

for

Mobiles/Fixed Base Station

for

FCC ID: PKRNVWEV620
Model: Mini-Card EV620

to

Federal Communications Commission

47 CFR 1.1310 (MPE)
Radiofrequency Radiation Exposure Limits

Date Of Report: July 11, 2005

On the Behalf of the Applicant:

Novatel Wireless Inc.

At the Request of:

P.O. NWS21012

Novatel Wireless Inc.
9255 Towne Centre Dr., Suite 225
San Diego, CA 92121-3030

Attention of:

John Ross
858-812-0614; FAX: -2888
Email: jross@novatelwireless.com

Supervised By:

Michael Findley, Laboratory Manager

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Required information per ISO/IEC Guide 25-1990, paragraph 13.2:

a) **Test Report (Supplemental)**

b) Laboratory: M. Flom Associates, Inc.
(FCC: 31040/SIT) 3356 N. San Marcos Place, Suite 107
(Canada: IC 2044) Chandler, AZ 85225

c) Report Number: d0570019

d) Client: Novatel Wireless Inc.
9255 Towne Centre Dr., Suite 225
San Diego, CA 92121-3030

e) Identification: Mini-Card EV620
FCC ID: PKRNVWEV620
Description: CDMA Cell-PCS Module

f) EUT Condition: Not required unless specified in individual tests.

g) Report Date: July 11, 2005
EUT Received: June 30, 2005

h, j, k): As indicated in individual tests.

i) Sampling method: No sampling procedure used.

l) Uncertainty: In accordance with MFA internal quality manual.

m) Supervised by:



Michael Findley, Laboratory Manager

n) Results: The results presented in this report relate only to the item tested.

o) Reproduction: This report must not be reproduced, except in full, without written permission from this laboratory.

Identification of the Equipment Under Test (EUT)

Name and Address of Applicant:

Novatel Wireless Inc.
9255 Towne Centre Dr., Suite 225
San Diego, CA 92121-3030

Manufacturer:

Novatel Wireless Inc.
9255 Towne Centre Dr., Suite 225
San Diego, CA 92121-3030

FCC ID:		PKRNVWV620
Model Number:		Mini-Card EV620
Description:		CDMA Cell-PCS Module
Type of Emission:		1M25F9W
Frequency Range, MHz:		824.7 to 848.3 1851.3 to 1908.7
Power Rating, Watts:		0.282 (Cell & PCS)
<input type="checkbox"/> Switchable	<input checked="" type="checkbox"/> Variable	<input type="checkbox"/> N/A
Modulation:		<input type="checkbox"/> AMPS <input type="checkbox"/> TDMA <input checked="" type="checkbox"/> CDMA <input type="checkbox"/> OTHER
Antenna:		<input type="checkbox"/> Helical <input type="checkbox"/> Monopole <input checked="" type="checkbox"/> Whip <input type="checkbox"/> Other

Note: For RF Safety test antenna gain taken at the upper range of expected gain (i.e. 5dBi) and RF Power set to highest nominal power across all channels.



A2LA

"A2LA has accredited M. Flom Associates, Inc. Chandler, AZ for technical competence in the field of Electrical Testing. The accreditation covers the specific tests and types of tests listed on the agreed scope of accreditation. This laboratory meets the requirements of ISO/IEC 17025 - 1999 'General Requirements for the Competence of Testing and Calibration Laboratories' and any additional program requirements in the identified field of testing."

Certificate Number: **2152-01**



NIST

I am pleased to inform you that your laboratory has been validated by the Chinese Taipei Bureau of Standards, Metrology and Inspection (BSMI) under the Asia Pacific Economic Cooperation Mutual Recognition Agreement (APEC MRA). Your laboratory is now formally designated to act as a Conformity Assessment Body (CAB) under Appendix B, Phase I Procedures, of the APEC MRA between the American Institute in Taiwan (AIT) and the Taipei Economic and Cultural Representative Office (TECRO) in the United States, covering equipment subject to Electro-Magnetic Compatibility (EMC) requirements. The names of all validated and nominated laboratories will be posted on the NIST website at <http://ts.nist.gov/mra> under the 'Asia' category."

BSMI Number: **SL2-IN-E-041R**

Standard Test Conditions and Engineering Practices

Except as noted herein, the following conditions and procedures were observed during the testing:

In accordance with ANSI C63.4-1992/2000, section 6.1.9, and unless otherwise indicated in the specific measurement results, the ambient temperature of the actual EUT was maintained within the range of 10° to 40°C (50° to 104 °F) unless the particular equipment requirements specify testing over a different temperature range. Also, unless otherwise indicated, the humidity levels were in the range of 10% to 90% relative humidity.

Prior to testing, the EUT was tuned up in accordance with the manufacturer's alignment procedures. All external gain controls were maintained at the position of maximum and/or optimum gain throughout the testing.

Measurement results, unless otherwise noted, are worst-case measurements.

Name of test: Environmental Assessment

Specification: FCC: 47 CFR 1.1310

Cellular CDMA

	MPE Calculated
Frequency, MHZ	836
Limit	$f/1500 = 0.5573 \text{ mW/cm}^2$
Minimum Safe Distance	$= [1.0/(12.56 \times 5.573)]^{1/2}$ $= 0.119526 \text{ m}$ $= 11.95 \text{ cm}$

PCS CDMA

	MPE Calculated
Frequency, MHZ	1880
Limit	1.0 mW/cm^2
Minimum Safe Distance	$= [1.0/(12.56 \times 10.00)]^{1/2}$ $= 0.089229 \text{ m}$ $= 8.92 \text{ cm}$

Calculated By:



David E. Lee, Quality Assurance Manager

(The following will be placed in the Instruction Manual)

Mandatory Safety Instructions to Installers & Users

Use external antenna with overall gain of 5dBi or lower.

Antenna Minimum Safe Distance: 20 cm

Antenna Gain: 3 dBd referenced to a dipole (5dBi)

The Federal Communications Commission has adopted a safety standard for human exposure to RF (Radio Frequency) energy which is below the OSHA (Occupational Safety and Health Act) limits.

Antenna Mounting: The antenna supplied by the manufacturer or radio dealer must not be mounted at a location such that during radio transmission, any person or persons can come closer than the above indicated minimum safe distance to the antenna i.e. **20 cm**

To comply with current FCC RF Exposure limits, the antenna must be installed at or exceeding the minimum safe distance shown above, and in accordance with the requirements of the antenna manufacturer or supplier.

Base Station Installation: The antenna should be fixed-mounted on an outdoor permanent structure. RF Exposure compliance must be addressed at the time of installation.

Antenna Substitution: Do not substitute any antenna for the one supplied or recommended by the manufacturer or radio dealer. You may be exposing person or persons to excess radio frequency radiation. You may contact your radio dealer or the manufacturer for further instructions.

Warning: Maintain a separation distance from the antenna to a person(s) of at least **20cm**

You, as the qualified end-user of this radio device must control the exposure conditions of bystanders to ensure the minimum separation distance (above) is maintained between the antenna and nearby persons for satisfying RF Exposure compliance. The operation of this transmitter must satisfy the requirements of Occupational/Controlled Exposure Environment, for work-related use. Transmit only when person(s) are at least the minimum distance from the properly installed, externally mounted antenna.

**Testimonial
and
Statement of Certification**

This is to certify that:

1. **That** the application was prepared either by, or under the direct supervision of, the undersigned.
2. **That** the technical data supplied with the application was taken under my direction and supervision.
3. **That** the data was obtained on representative units, randomly selected.
4. **That**, to the best of my knowledge and belief, the facts set forth in the application and accompanying technical data are true and correct.



Certifying Engineer:

David E. Lee, Quality Assurance Manager