



# PCTEST ENGINEERING LABORATORY, INC.

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## SAR COMPLIANCE EVALUATION REPORT

**Applicant Name:**  
Novatel Wireless Inc.  
9645 Scranton Road, Suite 205  
San Diego, CA 92121-3030  
United States

**Date of Testing:**  
10/31/10 - 11/03/10  
**Test Site/Location:**  
PCTEST Lab, Columbia, MD, USA  
**Test Report Serial No.:**  
0Y1011031794-R1.PKR

**FCC ID:** PKRNVWMC551

**APPLICANT:** NOVATEL WIRELESS INC.

**EUT Type:** Cellular/PCS CDMA/EVDO and LTE USB Modem  
**Application Type:** Class II Permissive Change  
**FCC Rule Part(s):** CFR §2.1093; FCC/OET Bulletin 65 Supplement C [June 2001]  
**FCC Classification:** PCS Licensed Transmitter (PCB)  
**Model(s):** MC551  
**Tx Frequency:** 824.70 - 848.31 MHz (Cellular CDMA)  
1851.25 - 1908.75 MHz (PCS CDMA)  
779.5 - 784.5 MHz (LTE Band 13, 5 MHz BW)  
782 MHz (LTE Band 13, 10 MHz BW)  
**Conducted Power:** 24.2 dBm Cell. CDMA  
23.84 dBm PCS CDMA  
24.46 dBm LTE Band 13  
**Max. SAR Measurement:** 0.47 W/kg Cell. CDMA Body SAR  
1.21 W/kg PCS CDMA Body SAR  
0.80 W/kg LTE Band 13 Body SAR  
**Test Device Serial No.:** Pre-Production [S/N: #1]  
**Original Grant Date:** 11/18/2010  
**Class II Permissive Change:** Adding USB Cable. See Section 8.2.

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 C95.1-1992 and has been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001), IEEE 1528-2003 and in applicable Industry Canada Radio Standards Specifications (RSS); for North American frequency bands only.

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. Test results reported herein relate only to the item(s) tested.

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

Randy Ortanez  
President





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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 C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz[3] and Health Canada RF Exposure Guidelines Safety Code 6 [24]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] 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 ( $\rho$ ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 1-1).

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

Figure 1-1  
SAR Mathematical Equation



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

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

where:

- $\sigma$  = conductivity of the tissue-simulating material (S/m)
- $\rho$  = mass density of the tissue-simulating material ( $\text{kg/m}^3$ )
- 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]

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## 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.

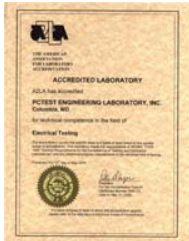
These measurement tests were conducted at the PCTEST Engineering Laboratory, Inc. facility in New Concept Business Park, Guilford Industrial Park, Columbia, Maryland. The site address is 6660-B Dobbin Road, Columbia, MD 21045. The test site is one of the highest points in the Columbia area with an elevation 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.



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

### 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

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## 3 SAR MEASUREMENT SETUP

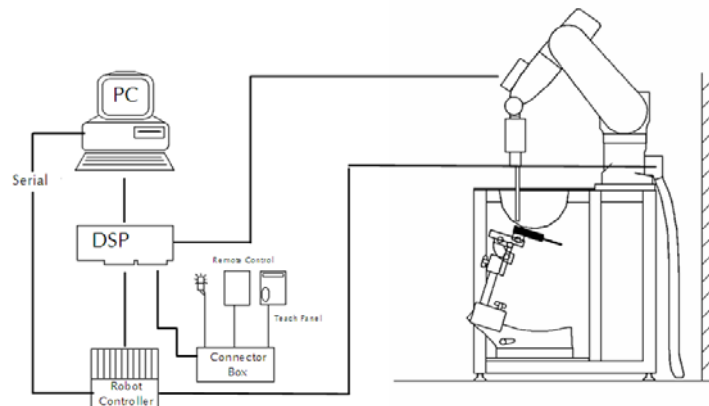
### 3.1 Robotic System

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 a high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the SAM phantom containing the head or body 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).

### 3.1 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 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, A/D 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 from the DAE and transfers data to the PC card.

### 3.2 System Electronics



**Figure 3-1**  
**SAR Measurement System Setup**

The DAE consists of a highly sensitive electrometer-grade auto-zeroing preamplifier, 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.

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### 3.3 Automated Test System Specifications

Test Software: SPEAG DASY 4.7 Measurement Software

Positioner

Robot: Stäubli Unimation Corp. Robot RX60L

Repeatability: 0.02 mm

No. of Axes: 6

Data Acquisition Electronic System (DAE)

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

PC Interface Card

Function: Link to DAE

16-bit A/D converter for surface detection system

Two Serial & Ethernet link to robotics

Direct emergency stop output for robot

Phantom



Type: SAM Twin Phantom (V4.0)

Shell Material: Composite

Thickness: 2.0 ± 0.2 mm



**Figure 3-2  
SAR Measurement System**

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### 4.1 Probe Measurement System



**Figure 4-1**  
SAR System

The SAR measurements were conducted with the dosimetric probe designed in the classical triangular configuration (see Figure 4-3) and optimized for dosimetric evaluation [9]. 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. 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 curve fitting (see Figure 5-1). The approach is stopped at reaching the maximum.

### 4.1 Probe Specifications



<b>Model:</b>	ES3DV3, EX3DV4
<b>Frequency Range:</b>	10 MHz – 6.0 GHz (EX3DV4) 10 MHz – 4 GHz (ES3DV3)
<b>Calibration:</b>	In head and body simulating tissue at Frequencies from 835 up to 5800MHz
<b>Linearity:</b>	± 0.2 dB (30 MHz to 6 GHz) for EX3DV4 ± 0.2 dB (30 MHz to 4 GHz) for ES3DV3
<b>Dynamic Range:</b>	10 mW/kg – 100 W/kg
<b>Probe Length:</b>	330 mm
<b>Probe Tip Length:</b>	20 mm
<b>Body Diameter:</b>	12 mm
<b>Tip Diameter:</b>	2.5 mm (3.9mm for ES3DV3)
<b>Tip-Center:</b>	1 mm (2.0 mm for ES3DV3)
<b>Application:</b>	SAR Dosimetry Testing Compliance tests of mobile phones Dosimetry in strong gradient fields



**Figure 4-2**  
Near-Field Probe



**Figure 4-3**  
Triangular Probe Configuration

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# 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<sup>2</sup>) 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<sup>2</sup>.

## 5.3 Temperature Assessment

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head 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.

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

where:

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

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

where:

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

SAR is proportional to  $\Delta T/\Delta t$ , the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

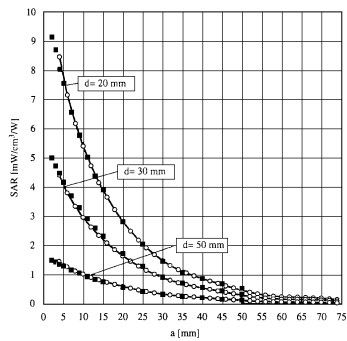


Figure 5-1 E-Field and Temperature measurements at 900MHz [7]

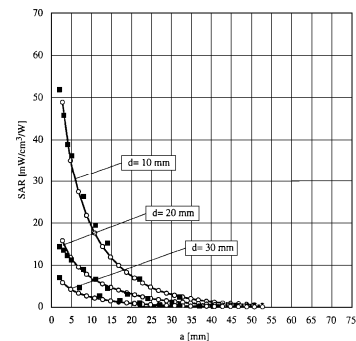


Figure 5-2 E-Field and temperature measurements at 1.9GHz [7]

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## 6 PHANTOM AND EQUIVALENT TISSUES

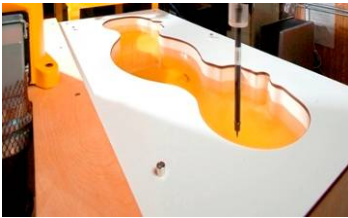
### 6.1 SAM Phantoms



**Figure 6-1  
SAM Phantoms**

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a table. The shape of the shell is based on data from an anatomical study designed to represent the 90<sup>th</sup> percentile of the population [12][13]. The phantom enables the dosimetric evaluation of SAR for both left and right handed handset usage, as well as body-worn usage using the flat phantom region. 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. The shell phantom has a 2mm shell thickness (except the ear region where shell thickness increases to 6 mm).

### 6.1 Head & Body Simulating Mixture Characterization





**Figure 6-2  
SAM Phantom with  
Simulating Tissue**

The mixture is characterized to obtain proper dielectric constant (permittivity) and conductivity of the tissue of interest. The head tissue dielectric parameters recommended in IEEE 1528 and IEC 62209 have been used as targets for the compositions, and are to match within 5%, per the FCC recommendations.

**Table 6-1**  
Composition of the Head & Body Tissue Equivalent Matter

Frequency (MHz)	835	1900
Tissue	Body	Body
Ingredients (% by weight)		
Bactericide	0.1	
DGBE		29.44
HEC	1	
NaCl	0.94	0.39
Sucrose	44.9	
Triton X-100		
Water	53.06	70.16

See next page for 750 MHz tissue info.

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**Table 6-2**  
Composition of the 750MHz Body Tissue Equivalent Matter

<b>2 Composition / Information on ingredients</b>	
The Item is composed of the following ingredients:	
H <sub>2</sub> O	Water, 35 – 58%
Sucrose	Sugar, white, refined, 40 – 60%
NaCl	Sodium Chloride, 0 – 8%
Hydroxyethyl-cellulose	Medium Viscosity (CAS# 9004-82-0), <0.3%
Preventol-D7	Preservative: aqueous preparation, (CAS# 55965-84-9), containing 5-chloro-2-methyl-3(2H)-isothiazolone and 2-methyl-3(2H)-isothiazolone, 0.1 – 0.7%
	Relevant for safety; Refer to the respective Safety Data Sheet*.

**Note:** 750MHz Body liquid recipe is proprietary SPEAG. The composition is approximate to the actual liquids utilized. Thus the manufacturer production sheet is provided below.

**Figure 6-1**  
750MHz Body Tissue Equivalent Matter

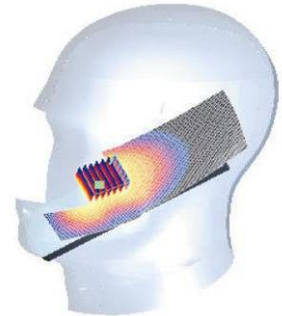
f [MHz]	HP-e'	HP-e''	sigma	P/N:	SL AAM 075	TARGET PARAMETERS		
300	61.02	35.43	0.59	Charge:	090224-1	f [MHz]	eps	sigma
350	60.21	32.13	0.63	Mea Date:	05-Mrz-09	700	55.7	0.96
400	59.50	29.71	0.66	Temp [°C]	22	750	55.5	0.96
450	58.79	28.00	0.70			800	55.3	0.97
500	58.16	26.60	0.74					
550	57.57	25.54	0.78					
600	56.99	24.68	0.82					
650	56.43	23.97	0.87					
700	55.88	23.46	0.91					
750	55.35	22.91	0.96					
800	55.02	22.56	1.00					
850	54.50	22.31	1.06					
900	54.02	22.08	1.11					
950	53.55	21.89	1.16					
1000	53.05	21.70	1.21					

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### 7.1 Measurement Procedure

The evaluation was performed using the following procedure:

1. The SAR distribution at the exposed side of the head was measured at a distance of 3.0mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 10mm x 10mm.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during testing the 1 gram cube. This fixed point was measured and used as a reference value.
3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 30mm x 30mm x 30mm (fine resolution volume scan, zoom scan) was assessed by measuring 7 x 7 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual for more details):
  - a. The data was extrapolated to the surface of the outer-shell of the phantom. The combined distance extrapolated was the combined distance from the center of the dipoles 2.7mm away from the tip of the probe housing plus the 1.2 mm distance between the surface and the lowest measuring point. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
  - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 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 then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
  - 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 2, was re-measured after the zoom scan was complete. If the value deviated by more than 5%, the evaluation was repeated.





**Figure 7-1**  
Sample SAR Area Scan

### 7.2 Specific Anthropomorphic Mannequin (SAM) Specifications

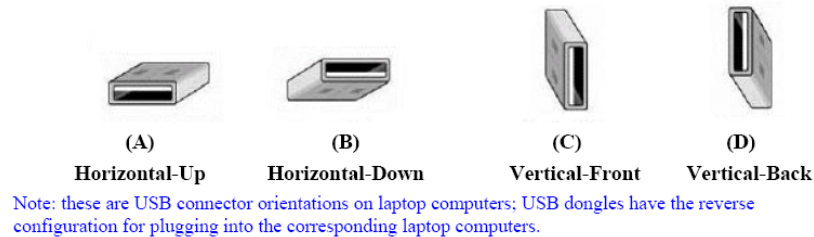
The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and 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 minimize reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15 cm.



**Figure 7-2**  
SAM Twin Phantom Shell

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## 8.1 SAR test procedure for USB Dongles





**Figure 8-1**  
**USB Dongle Test Configurations**

Per KDB 447498 Publication: USB orientations (see Figure 8-1) with a device to phantom separation distance of 5 mm or less, according to KDB 447498 requirements. Current generation laptop computers should be used to ensure proper measurement distances. The same test separation distance should be used for all frequency bands and modes in each USB orientation. The typical Horizontal-Up USB connection (A), found in the majority of laptop computers, must be tested using an appropriate laptop computer. A laptop with either Vertical-Front (C) or Vertical-Back (D) USB connection should be used to test one of the vertical USB orientations. If laptop computers are not available for testing the Horizontal-Down (B) or the remaining Vertical USB orientation, a short and high quality USB cable (12 inches or less) may be used for testing these other orientations. It should be ensured that the USB cable does not affect device radiating characteristics and output power of the dongle.

KDB Inquiry 320573 and LTE interim SAR procedures KDB Publication 941225 outlines bandwidth, resource block, and offset test configurations recommended for the LTE portion of the tests.

## 8.2 Purpose for SAR Testing

Due to the USB cable being supplied for this permissive change filing, per KDB Inquiry 498624 the Horizontal-Up position was tested at 10 mm since testing for this particular side was not required without the USB cable. Therefore, new SAR testing is required to show compliance with the side of the USB dongle not previously tested.

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### 8.3 SAR Device Functionality

The device utilizes a mechanism that alters the transmit functionality of the device based on the angle of the USB connector. When the device is inserted into a horizontal USB port (Reference KDB Publication 447498, "Horizontal Up position 'A'") the modem hinge has been engineered to automatically orient the modem angle to 120°. At this angle the modem will function normally. If the modem is moved slightly either up or down (110° to 130°) there is no affect on the performance of the device. Should the MC547 move at an angle less than 110° or greater than 130° the transmit power will turn off. There is a delay mechanism that allows the modem to continue transmitting for 5s in the case of accidental movement. Once the device has been returned to the 120° position normal operation can be restored.

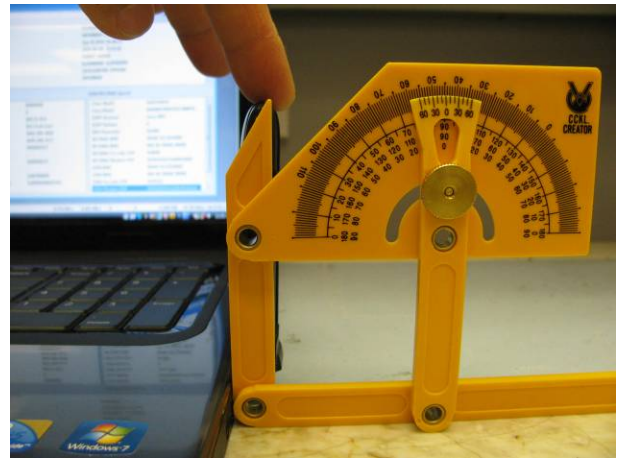
The measured SAR orientations have been considered based on the possible USB positions stated in KDB Publication 447498.

In the enclosed example a call has been established with a call box in EVDO rev.0 with an angle of 120° (Start). The modem is then slowly moved to the angle as indicated below (End). The operation of the detection system is verified through the supporting QXDM plots referenced in the table.

Starting Angle (degrees)	End Angle (degrees)	Measured O/P Power (dBm) Start	Measured O/P Power (dBm)	Comments
120	90	23.8	0.0 – Low Power Mode	See diagram 1
120	100	23.8	0.0 – Low Power Mode	See diagram 2
120	110	23.8	23.8	See diagram 3
120	120	23.8	23.8	See diagram 4
120	130	23.8	23.8	See diagram 5
120	140	23.8	0 Low Power Mode	See diagram 6
120	180	23.8	0 Low Power Mode	See diagram 7
120	180	23.8	0 Low Power Mode	See diagram 8

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# Diagram 1 ( 90 ° )



**Status (Dynamic)**

Common

**Common Information**

- System Determination Event Action**
  - Sys Selection Event: SDSS\_EVT\_USER\_PWR\_DOWN
  - Sys Selection Action: SDLOG\_ACT\_CONTINUE
  - SD State: OPERATION
- Call Manager State Information**
  - Band Preference
  - Roam Preference
  - Call State: Idle
  - Operation Mode: Low Power Mode
  - System Mode: No Service
  - Mode Preference: CDMA Only
  - Server Domain: PS Only
  - Acquisition Order: Automatic
  - Hybrid Preference: On
  - Network Mode: Automatic
  - Service Status: No Service
- State**
  - Protocol State: No Service In Any Mode
- MC Log Information**
  - Call 1

CDMA GSM/WCDMA

**CDMA Information**

- CDMA**
  - RF Mode: Sleep Mode
  - Entry: 0
  - Code: 255
  - Frequency: 27
  - System ID: 1234
  - Network ID: 1
  - State: 8
  - Cell: 12
  - Frames: -
  - Location Area ID: -
  - RSSI: -
  - Analog Power: -
  - Word Syncs: -
  - Corrected Frames: -
  - Analog Bad Frames: -
- IS2000**
  - Band Class: 1.8 - 2.0 GHz PCS
  - Frequency: 27



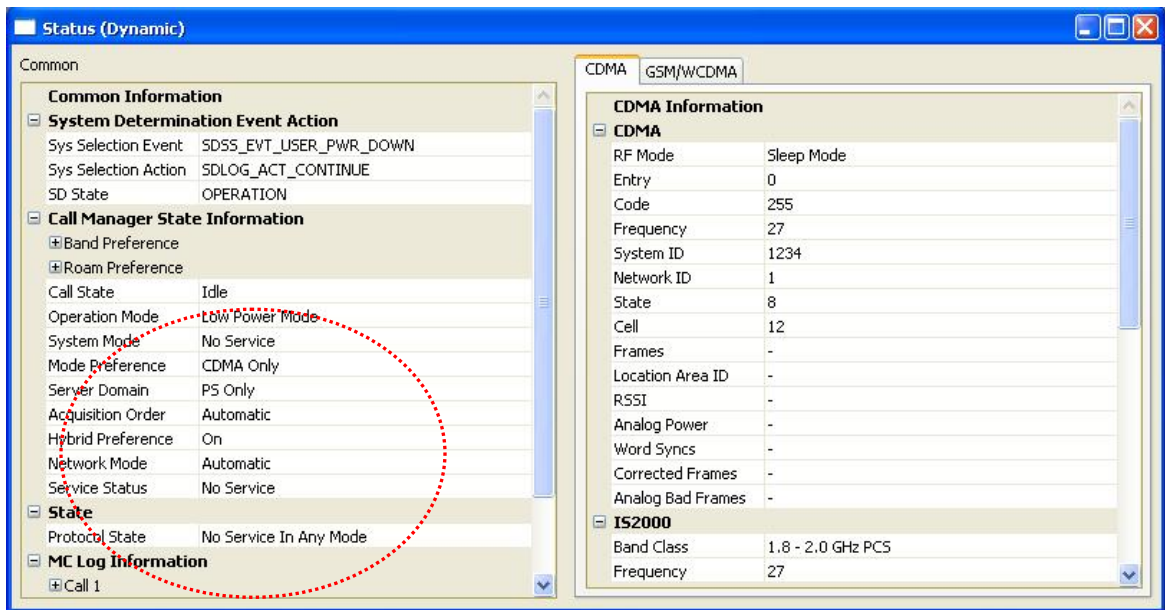
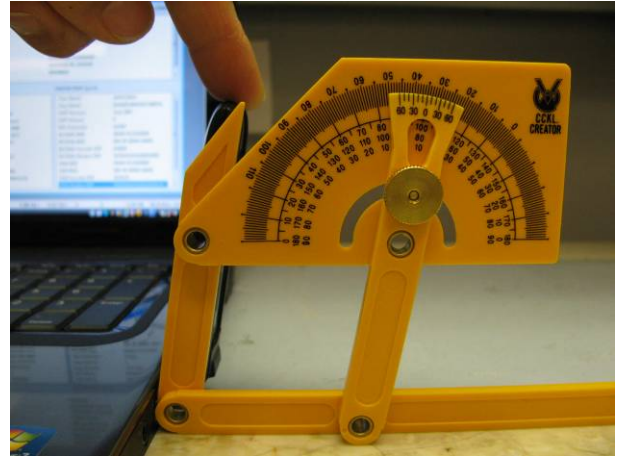
FCC ID: PKRNVWMC551	 PCTEST ENGINEERING LABORATORY, INC.	SAR COMPLIANCE REPORT	 NOVATEL WIRELESS	Reviewed by: Quality Manager
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Diagram 2 ( 100 ° )





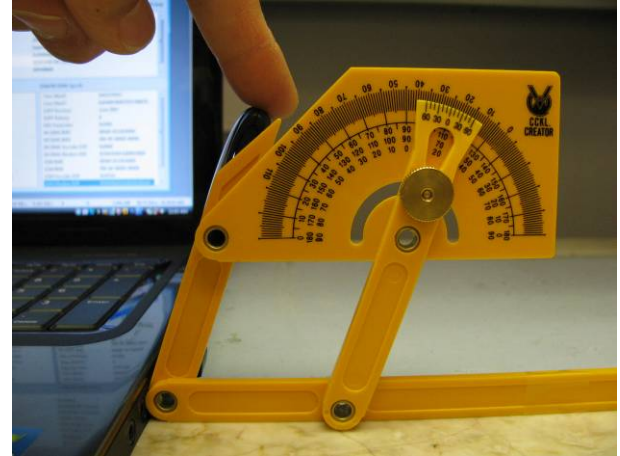
FCC ID: PKRNVWC551	 PCTEST ENGINEERING LABORATORY, INC.	SAR COMPLIANCE REPORT	 NOVATEL WIRELESS	Reviewed by: Quality Manager
Filename: 0Y1011031794-R1.PKR	Test Dates: 09/13/10 - 11/03/10	EUT Type: Cellular/PCS CDMA/EVDO and LTE USB Modem		Page 15 of 37

Diagram 3 ( 110 ° )

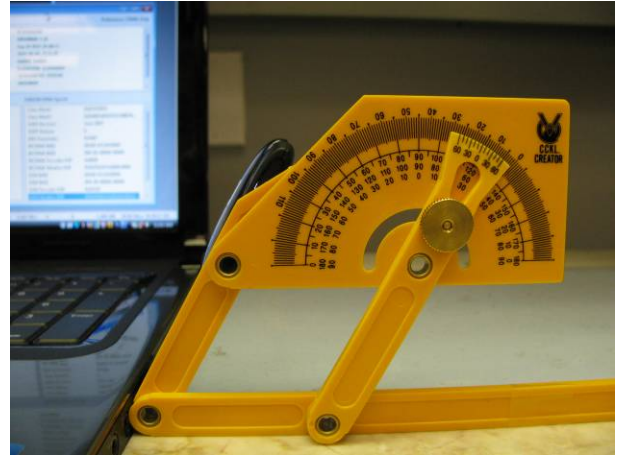


Common		CDMA	
<b>Common Information</b>		<b>CDMA Information</b>	
<ul style="list-style-type: none"> <li>System Determination Event Action                             <ul style="list-style-type: none"> <li>Sys Selection Event: SDSS_EVT_MISC_TIMER_RESEL_NO</li> <li>Sys Selection Action: SDLOG_ACT_CONTINUE</li> <li>SD State: OPERATION</li> </ul> </li> <li>Call Manager State Information                             <ul style="list-style-type: none"> <li>Band Preference</li> <li>Roam Preference</li> <li>Call State: Conversation</li> <li>Operation Mode: Online</li> <li>System Mode: CDMA</li> <li>Mode Preference: CDMA Only</li> <li>Server Domain: PS Only</li> <li>Acquisition Order: Automatic</li> <li>Hybrid Preference: On</li> <li>Network Mode: Automatic</li> <li>Service Status: Service Available</li> </ul> </li> <li>State                             <ul style="list-style-type: none"> <li>Protocol State: CDMA - Conversation</li> </ul> </li> <li>MC Log Information                             <ul style="list-style-type: none"> <li>Call 1</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>CDMA                             <ul style="list-style-type: none"> <li>RF Mode: CDMA PCS</li> <li>Entry: Normal CDMA Operation</li> <li>Code: 255</li> <li>Frequency: 27</li> <li>System ID: 1234</li> <li>Network ID: 1</li> <li>State: Traffic Channel State</li> <li>Cell: 12</li> <li>Frames: -</li> <li>Location Area ID: -</li> <li>RSSI: -</li> <li>Analog Power: -</li> <li>Word Syncs: -</li> <li>Corrected Frames: -</li> <li>Analog Bad Frames: -</li> </ul> </li> <li>IS2000                             <ul style="list-style-type: none"> <li>Band Class: 1.8 - 2.0 GHz PCS</li> <li>Frequency: 27</li> </ul> </li> </ul>	

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## Diagram 4 ( 120 ° ) Hinge Static Position



**Status (Dynamic)**

Common

**Common Information**

- System Determination Event Action
  - Sys Selection Event: SDSS\_EVT\_MISC\_TIMER\_RESEL\_NO
  - Sys Selection Action: SDLOG\_ACT\_CONTINUE
  - SD State: OPERATION
- Call Manager State Information
  - Band Preference
  - Roam Preference
  - Call State: Conversation
  - Operation Mode: **Online**
  - System Mode: CDMA
  - Mode Preference: CDMA Only
  - Server Domain: PS Only
  - Acquisition Order: Automatic
  - Hybrid Preference: On
  - Network Mode: Automatic
  - Service Status: Service Available
- State
  - Protocol State: CDMA - Conversation
- MC Log Information
  - Call 1

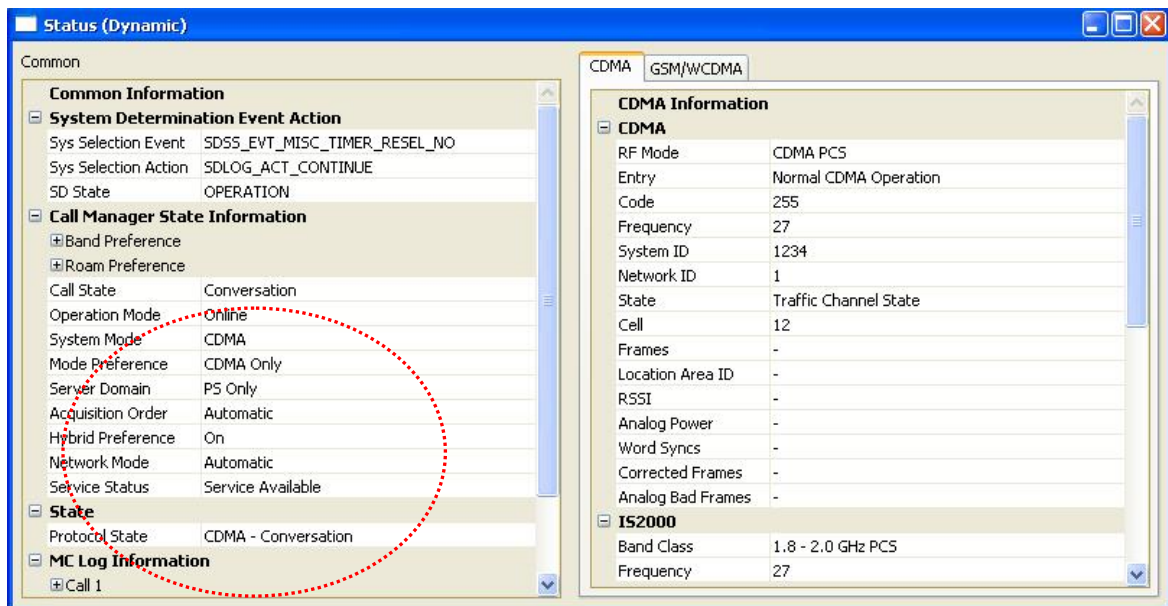
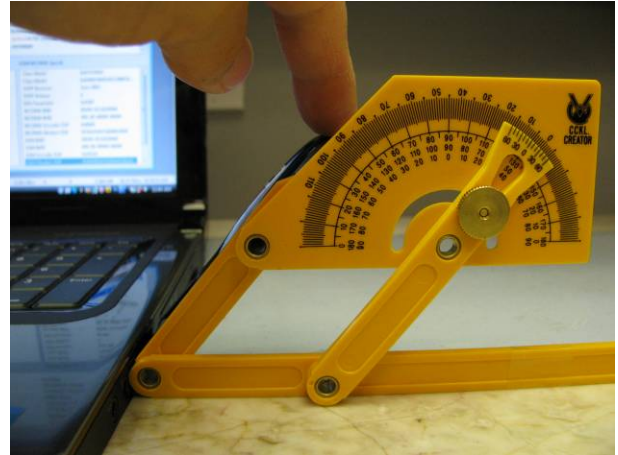
CDMA GSM/WCDMA

**CDMA Information**

- CDMA
  - RF Mode: CDMA PCS
  - Entry: Normal CDMA Operation
  - Code: 255
  - Frequency: 27
  - System ID: 1234
  - Network ID: 1
  - State: Traffic Channel State
  - Cell: 12
  - Frames: -
  - Location Area ID: -
  - RSSI: -
  - Analog Power: -
  - Word Syncs: -
  - Corrected Frames: -
  - Analog Bad Frames: -
- IS2000
  - Band Class: 1.8 - 2.0 GHz PCS
  - Frequency: 27

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Diagram 5 ( 130 ° )





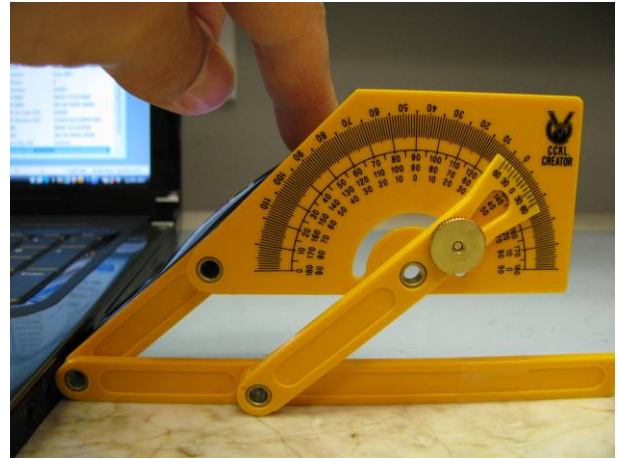
FCC ID: PKRNVWMC551	 PCTEST ENGINEERING LABORATORY, INC.	SAR COMPLIANCE REPORT	 NOVATEL WIRELESS	Reviewed by: Quality Manager
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Diagram 6 ( 140 ° )



**Status (Dynamic)**

Common

**Common Information**

- System Determination Event Action
  - Sys Selection Event: SDSS\_EVT\_USER\_PWR\_DOWN
  - Sys Selection Action: SDLOG\_ACT\_CONTINUE
  - SD State: OPERATION
- Call Manager State Information
  - Band Preference
  - Roam Preference
  - Call State: Idle
  - Operation Mode: Low Power Mode
  - System Mode: No Service
  - Mode Preference: CDMA Only
  - Server Domain: PS Only
  - Acquisition Order: Automatic
  - Hybrid Preference: On
  - Network Mode: Automatic
  - Service Status: No Service
- State
  - Protocol State: No Service In Any Mode
- MC Log Information
  - Call 1

CDMA GSM/WCDMA

**CDMA Information**

- CDMA
  - RF Mode: Sleep Mode
  - Entry: 0
  - Code: 255
  - Frequency: 27
  - System ID: 1234
  - Network ID: 1
  - State: 8
  - Cell: 12
  - Frames: -
  - Location Area ID: -
  - RSSI: -
  - Analog Power: -
  - Word Syncs: -
  - Corrected Frames: -
  - Analog Bad Frames: -
- IS2000
  - Band Class: 1.8 - 2.0 GHz PCS
  - Frequency: 27



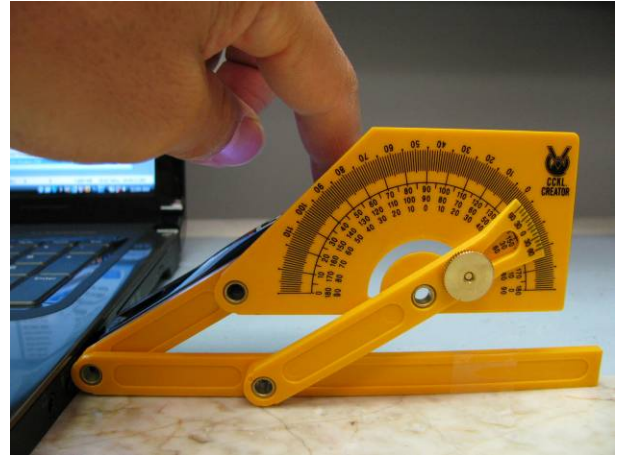
FCC ID: PKRNVWMC551	 PCTEST ENGINEERING LABORATORY, INC.	SAR COMPLIANCE REPORT	 NORTEL WIRELESS	Reviewed by: Quality Manager
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Diagram 7 ( 150 ° )



**Status (Dynamic)**

Common

**Common Information**

- System Determination Event Action**
  - Sys Selection Event: SDSS\_EVT\_USER\_PWR\_DOWN
  - Sys Selection Action: SDLOG\_ACT\_CONTINUE
  - SD State: OPERATION
- Call Manager State Information**
  - Band Preference
  - Roam Preference
  - Call State: Idle
  - Operation Mode: Low Power Mode
  - System Mode: No Service
  - Mode Preference: CDMA Only
  - Server Domain: PS Only
  - Acquisition Order: Automatic
  - Hybrid Preference: On
  - Network Mode: Automatic
  - Service Status: No Service
- State**
  - Protocol State: No Service In Any Mode
- MC Log Information**
  - Call 1

CDMA GSM/WCDMA

**CDMA Information**

- CDMA**
  - RF Mode: Sleep Mode
  - Entry: 0
  - Code: 255
  - Frequency: 27
  - System ID: 1234
  - Network ID: 1
  - State: 8
  - Cell: 12
  - Frames: -
  - Location Area ID: -
  - RSSI: -
  - Analog Power: -
  - Word Syncs: -
  - Corrected Frames: -
  - Analog Bad Frames: -
- IS2000**
  - Band Class: 1.8 - 2.0 GHz PCS
  - Frequency: 27



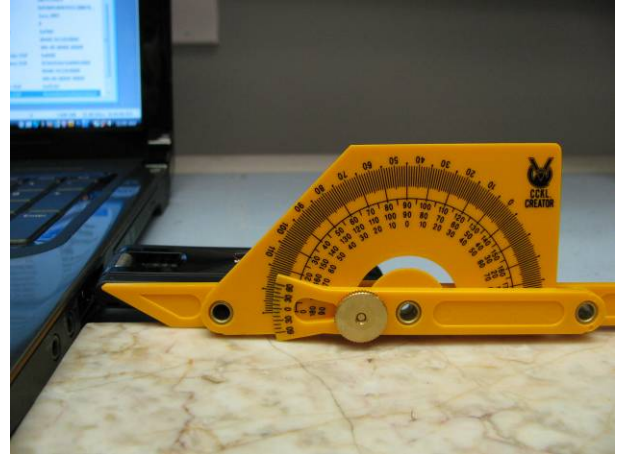
FCC ID: PKRNVWMC551		SAR COMPLIANCE REPORT		Reviewed by: Quality Manager
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Diagram 8 ( 180 ° )



**Status (Dynamic)**

Common



**Common Information**

- System Determination Event Action**
  - Sys Selection Event: SDSS\_EVT\_USER\_PWR\_DOWN
  - Sys Selection Action: SDLOG\_ACT\_CONTINUE
  - SD State: OPERATION
- Call Manager State Information**
  - Band Preference
  - Roam Preference
  - Call State: Idle
  - Operation Mode: Low Power Mode
  - System Mode: No Service
  - Mode Preference: CDMA Only
  - Server Domain: PS Only
  - Acquisition Order: Automatic
  - Hybrid Preference: On
  - Network Mode: Automatic
  - Service Status: No Service
- State**
  - Protocol State: No Service In Any Mode
- MC Log Information**
  - Call 1

CDMA GSM/WCDMA

**CDMA Information**

- CDMA**
  - RF Mode: Sleep Mode
  - Entry: 0
  - Code: 255
  - Frequency: 27
  - System ID: 1234
  - Network ID: 1
  - State: 8
  - Cell: 12
  - Frames: -
  - Location Area ID: -
  - RSSI: -
  - Analog Power: -
  - Word Syncs: -
  - Corrected Frames: -
  - Analog Bad Frames: -
- IS2000**
  - Band Class: 1.8 - 2.0 GHz PCS
  - Frequency: 27

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# 9

## RF EXPOSURE LIMITS

### 9.1 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.



### 9.1 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 9-1**  
**SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6**

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (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

1. 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.



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# 10 MEASUREMENT UNCERTAINTIES

Applicable for 700 - 3000 MHz.

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 <sub>i</sub> 1gm	c <sub>i</sub> 10 gms	1gm u <sub>i</sub> (± %)	10gms u <sub>i</sub> (± %)	v <sub>i</sub>	
<b>Measurement System</b>										
Probe Calibration	E.2.1	6.55	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	∞	
<b>Test Sample Related</b>										
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	∞	
<b>Phantom &amp; Tissue Parameters</b>										
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	
<b>Combined Standard Uncertainty (k=1)</b>							RSS	12.4	12.0	299
<b>Expanded Uncertainty</b> (95% CONFIDENCE LEVEL)							k=2	24.7	24.0	

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

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# 11 SYSTEM VERIFICATION

## 11.1 Tissue Verification

**Table 11-1  
Measured Tissue Properties**

Calibrated for Tests Performed on:	Tissue Type	Measured Frequency (MHz)	Measured Conductivity, $\sigma$ (S/m)	Measured Dielectric Constant, $\epsilon$	TARGET Conductivity, $\sigma$ (S/m)	TARGET Dielectric Constant, $\epsilon$	% dev $\sigma$	% dev $\epsilon$
11/03/2010	750B	750	0.950	55.65	0.96	55.68	-1.26%	-0.05%
		760	0.964	55.51	0.96	55.28	0.10%	0.41%
		775	0.975	55.31	0.96	55.20	1.14%	0.20%
		790	0.991	55.17	0.97	55.15	2.59%	0.04%
10/31/2010	835B	820	0.930	53.42	0.97	55.28	-4.02%	-3.37%
		835	0.930	53.50	0.97	55.20	-4.12%	-3.08%
		850	0.960	53.59	0.99	55.15	-2.83%	-2.84%
11/01/2010	1900B	1850	1.510	51.78	1.52	53.30	-0.66%	-2.85%
		1880	1.530	51.58	1.52	53.30	0.66%	-3.23%
		1910	1.570	51.41	1.52	53.30	3.29%	-3.55%

Note: KDB 450824 Publication was applied for probe calibration frequencies greater than or equal to 50 MHz of the DUT frequencies.



The above measured tissue parameters were used in the DASY software to perform interpolation via the DASY software to determine actual dielectric parameters at the test frequencies (per IEEE 1528 6.6.1.2). The SAR test plots may slightly differ from the table above since the DASY software rounds to three significant digits.

## 11.2 Measurement Procedure for Tissue verification

- 1) The network analyzer and probe system was configured and calibrated.
- 2) The probe was immersed in the sample which was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
- 3) The complex admittance with respect to the probe aperture was measured
- 4) The complex relative permittivity, for example from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\epsilon_r\epsilon_0}{[\ln(b/a)]^2} \int_a^b \int_a^b \int_0^\pi \cos\phi' \frac{\exp[-j\omega r(\mu_0\epsilon_r'\epsilon_0)^{1/2}]}{r} d\phi' d\rho' d\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively,  $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$ ,  $\omega$  is the angular frequency, and  $j = \sqrt{-1}$ .

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### 11.3 Justification for Extended SAR Dipole Calibrations

Usage of SAR dipoles calibrated less than 2 years ago but more than 1 year ago were confirmed in maintaining return loss (< - 20 dB, within 20% of prior calibration) and impedance (within 5 ohm from prior calibration) requirements per extended calibrations in KDB 450824 Publication:

D835V2 SN: 4d026				
Date of Measurement	Return Loss (dB)	Δ %	Impedance (Ω)	ΔΩ
8/24/2009	-22.5		51	
8/19/2010	-21.4	-5%	50.1	-0.9

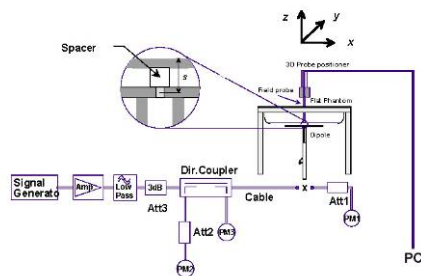
D1900V2 SN:5d080				
Date of Measurement	Return Loss (dB)	Δ %	Impedance (Ω)	ΔΩ
8/18/2009	-24.3		50	
8/19/2010	-22.4	-7.8%	51	1.0

### 11.4 Test System Verification

Prior to assessment, the system is verified to ±10% of the manufacturer SAR measurement on the reference dipole at the time of calibration.

**Table 11-2  
System Verification Results**

System Verification TARGET & MEASURED										
Date:	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Tissue Frequency (MHz)	Dipole SN	Tissue Type	Measured SAR <sub>1g</sub> (W/kg)	1 W Target SAR <sub>1g</sub> (W/kg)	1 W Normalized SAR <sub>1g</sub> (W/kg)	Deviation (%)
11/03/2010	23.9	22.1	0.100	750	1003	Body	0.837	8.880	8.37	-5.74%
10/31/2010	24.2	22.6	0.100	835	4d047	Body	0.972	9.820	9.72	-1.02%
11/01/2010	23.9	22.1	0.040	1900	5d080	Body	1.54	40.500	38.50	-4.94%



**Figure 11-1  
System Verification Setup Diagram**



**Figure 11-2  
System Verification Setup Photo**

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## 12 FCC 3G MEASUREMENT PROCEDURES FOR EVDO

Power measurements were performed using a base station simulator under digital average power.

### 12.1 Procedures Used to Establish RF Signal for SAR

The device 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. The SAR measurement software calculates a reference point at the start and end of the test to check for power drifts. If SAR deviations of more than 5% occurred, the tests were repeated.

### 12.2 SAR Measurement Conditions for EvDO Data Devices

Power measurements were performed using a base station simulator under digital average power.

### 12.3 Procedures Used to Establish RF Signal for SAR

The device 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, it 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 SAR deviations of more than 5% occurred, the tests were repeated.

### 12.4 SAR Measurement Conditions for CDMA2000

The following procedures were followed according to FCC "SAR Measurement Procedures for 3G Devices" v02, October 2007.



#### 12.4.1 Output Power Verification

Maximum output power is verified on the High, Middle and Low channels according to procedures in section 3.1.2.3.4 of 3GPP2 C.S0033-0/TIA-866 for Rev. 0 and section 4.3.4 of 3GPP2 C.S0033-A for Rev. A. For Rev. A, maximum output power for both Subtype 0/1 and Subtype 2 Physical Layer configurations was measured.

#### 12.4.2 Body SAR Measurements for EVDO Data devices

Body SAR is measured using Subtype 0/1 Physical Layer configurations for Rev. 0. SAR for Subtype 2 Physical layer configurations is not required for Rev. A when the maximum average output of each RF channels is less than that measured in Subtype 0/1 Physical layer configurations. Otherwise, SAR is measured on the maximum output channel for Rev. A using the exposure configuration that results in the highest SAR for the RF channels in Rev. 0.

The AT is tested with a Reverse Data Channel rate of 153.6 kbps in Subtype 0/1 Physical Layer configurations; and a Reverse Data Channel payload size of 4096 bits and Termination Target of 16 slots in Subtype 2 Physical Layer configurations. Both FTAP and FETAP are configured with a Forward Traffic Channel data rate corresponding to the 2-slot version of 307.2 kbps with the ACK Channel transmitting in all slots. AT power control should be in "All Bits Up" conditions for TAP/ETAP.

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# 13 RF CONDUCTED POWERS



## 13.1.1 CDMA Conducted Powers

Band	Channel	Data			
		TDSO SO32 [dBm]	TDSO SO32 [dBm]	1x EvDO Rev. 0 [dBm]	1x EvDO Rev. A [dBm]
	F-RC	FCH+SCH	FCH	(RTAP)	(RETAP)
Cellular	1013	24.03	24.02	24.11	24.03
	384	24.30	24.30	24.20	24.21
	777	24.12	24.08	24.14	24.05
PCS	25	23.83	23.83	23.82	23.65
	600	23.81	23.79	23.76	23.72
	1175	23.63	23.84	23.84	23.95

## 13.1 LTE Measured Maximum RF Output Conducted Powers

Table 13-1  
Band 13 LTE Conducted Power - 5 MHz

Frequency [MHz]	Modulation	Channel Bandwidth [MHz]	RB Size	RB Offset	Maximum Avg. Power [dBm]
779.5	QPSK	5	1	0	24.47
	16-QAM	5	1	0	24.44
	QPSK	5	1	24	24.36
	16-QAM	5	1	24	24.35
	QPSK	5	12	6	24.42
	16-QAM	5	12	6	24.29
	QPSK	5	25	0	24.45
	16-QAM	5	25	0	24.47
Frequency [MHz]	Modulation	Channel Bandwidth [MHz]	RB Size	RB Offset	Maximum Avg. Power [dBm]
784.5	QPSK	5	1	0	24.33
	16-QAM	5	1	0	24.07
	QPSK	5	1	24	24.30
	16-QAM	5	1	24	23.94
	QPSK	5	12	6	24.45
	16-QAM	5	12	6	24.31
	QPSK	5	25	0	24.42
	16-QAM	5	25	0	24.43



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**Table 13-2  
Band 13 LTE Conducted Powers - 10 MHz**

Frequency [MHz]	Modulation	Channel Bandwidth [MHz]	RB Size	RB Offset	Maximum Avg. Power [dBm]
782	QPSK	10	1	0	24.46
	16-QAM	10	1	0	24.44
	QPSK	10	1	49	24.36
	16-QAM	10	1	49	24.06
	QPSK	10	25	13	24.45
	16-QAM	10	25	13	24.45
	QPSK	10	50	0	<b>24.47</b>
	16-QAM	10	50	0	24.34

Notes:

1. LTE UE Power Class= 3
2. 10 MHz BW LTE has only one channel, whereas the 5 MHz BW LTE has two channels
3. SAR Test reductions were based on

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# 14 SAR DATA SUMMARY

**Table 14-1  
Cell. CDMA Body SAR Results**

MEASUREMENT RESULTS								
FREQUENCY		Mode/Band	Service	C_Power[dBm]		Side	Test Distance	SAR (1g)
MHz	Ch.			Start	End			(W/kg)
836.52	384	Cell. CDMA	EVDO	24.20	24.01	Horizontal-Up	10 mm	0.466
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population							Body 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 typical configuration.
2. All modes of operation were investigated, and worst-case results are reported.
3. Tissue parameters and temperatures are listed on the SAR plots.
4. Liquid tissue depth was at least 15.0 cm.
5. Justification for reduced test configurations: Mid channel only was tested when the SAR < 0.8 W/kg per KDB Publication 447498 1) e) i)
6. Body SAR was tested under EVDO Rev. 0 since RC3SO32 and EVDO REV A. modes are not greater than 0.25 dB of the EVDO Rev. 0 mode.
7. A Lenovo ThinkPad notebook was used for testing the modem configuration
8. The Horizontal-Up position was tested at 10 mm per KDB Inquiry 877092.



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**Table 14-2  
PCS CDMA Body SAR Results**

<b>MEASUREMENT RESULTS</b>								
<b>FREQUENCY</b>		<b>Mode/Band</b>	<b>Service</b>	<b>C_Power[dBm]</b>		<b>Side</b>	<b>Test Distance</b>	<b>SAR (1g)</b>
<b>MHz</b>	<b>Ch.</b>			<b>Start</b>	<b>End</b>			<b>(W/kg)</b>
1851.25	25	PCS CDMA	EVDO	23.82	24.00	Horizontal-Up	10 mm	1.210
1880.00	600	PCS CDMA	EVDO	23.76	23.70	Horizontal-Up	10 mm	1.210
1908.75	1175	PCS CDMA	EVDO	23.84	23.69	Horizontal-Up	10 mm	1.200
<b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>							<b>Body</b>	
<b>Spatial Peak</b>							<b>1.6 W/kg (mW/g)</b>	
<b>Uncontrolled Exposure/General Population</b>							<b>averaged over 1 gram</b>	

Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration.
2. All modes of operation were investigated, and worst-case results are reported.
3. Tissue parameters and temperatures are listed on the SAR plots.
4. Liquid tissue depth was at least 15.0 cm.
5. Justification for reduced test configurations: Mid channel only was tested when the SAR < 0.8 W/kg per KDB Publication 447498 1) e) i)
6. Body SAR was tested under EVDO Rev. 0 since RC3SO32 and EVDO REV A. modes are not greater than 0.25 dB of the EVDO Rev. 0 mode.
7. A Lenovo ThinkPad notebook was used for testing the modem configuration
8. The Horizontal-Up position was tested at 10 mm per KDB Inquiry 877092.



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**Table 14-3  
LTE Band 13 Body SAR Results**

MEASUREMENT RESULTS											
FREQUENCY		Mode/Band	Bandwidth	Modulation	C_Power[dBm]		Side	Test Position	RB Size	RB Offset	SAR (1g) (W/kg)
MHz	Ch.				Start	End					
782	23230	LTE-750	10 MHz	QPSK	24.45	24.49	Horizontal-Up	10 mm	25	13	0.777
782	23230	LTE-750	10 MHz	16 QAM	24.45	24.43	Horizontal-Up	10 mm	25	13	0.759
782	23230	LTE-750	10 MHz	QPSK	24.46	24.25	Horizontal-Up	10 mm	1	0	0.801
782	23230	LTE-750	10 Mhz	16 QAM	24.44	24.29	Horizontal-Up	10 mm	1	0	0.782
782	23230	LTE-750	10 MHz	QPSK	24.36	24.27	Horizontal-Up	10 mm	1	49	0.745
782	23230	LTE-750	10 Mhz	16 QAM	24.06	23.75	Horizontal-Up	10 mm	1	49	0.705
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population								Body 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 typical configuration.
2. All modes of operation were investigated, and worst-case results are reported.
3. Tissue parameters and temperatures are listed on the SAR plots.
4. Liquid tissue depth was at least 15.0 cm.
5. A Lenovo ThinkPad notebook was used for testing the modem configuration
6. The Horizontal-Up position was tested at 10 mm per KDB Inquiry 877092.
7. Bandwidth, RB Size, and RB offset test configurations were determined as outlined in KDB Inquiry 320573 for LTE and Interim SAR guidance KDB Publication 941225.
8. The 5 MHz bandwidth was not tested because the maximum average conducted output power for the 5 MHz bandwidth was within ½ dB of that measured for the highest channel bandwidth and the 10 MHz SAR was < 1.45 W/kg per KDB Publication 941225.
9. Device supports 5 and 10 MHz bandwidths. At the 10 MHz bandwidth there is only one channel of operation.

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# 15 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	85070B	Dielectric Probe Kit	8/22/2010	Annual	8/22/2011	US33020316
Agilent	8648D	(9kHz-4GHz) Signal Generator	10/11/2010	Annual	10/11/2011	3613A00315
Agilent	8753E	(30kHz-6GHz) Network Analyzer	3/31/2010	Annual	3/31/2011	JP38020182
Agilent	E8257D	(250kHz-20GHz) Signal Generator	3/30/2010	Annual	3/30/2011	MY45470194
Index SAR	IXTL-010	Dielectric Measurement Kit	N/A		N/A	N/A
Index SAR	IXTL-030	30MM TEM line for 6 GHz	N/A		N/A	N/A
Rohde & Schwarz	CMU200	Base Station Simulator	6/21/2010	Annual	6/21/2011	833855/0010
Rohde & Schwarz	NRV-Z32	Peak Power Sensor (100uW-2W)	12/5/2008	Biennial	12/5/2010	100155
Rohde & Schwarz	NRV-Z33	Peak Power Sensor (1mW-20W)	12/5/2008	Biennial	12/5/2010	100004
SPEAG	D1900V2	1900 MHz SAR Dipole	1/20/2009	Biennial	1/20/2011	502
SPEAG	D1900V2	1900 MHz SAR Dipole	8/18/2009	Biennial	8/18/2011	5d080
SPEAG	D835V2	835 MHz SAR Dipole	1/19/2009	Biennial	1/19/2011	4d047
SPEAG	D835V2	835 MHz SAR Dipole	8/24/2009	Biennial	8/24/2011	4d026
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/22/2010	Annual	3/22/2011	704
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/21/2010	Annual	4/21/2011	665
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/22/2010	Annual	1/22/2011	649
SPEAG	EX3DV4	SAR Probe	1/26/2010	Annual	1/26/2011	3550
SPEAG	DAE4	Dasy Data Acquisition Electronics	7/8/2010	Annual	7/8/2011	859
SPEAG	D750V3	750 MHz Dipole	8/19/2010	Annual	8/19/2011	1003
SPEAG	ES3DV3	SAR Probe	3/16/2010	Annual	3/16/2011	3213
SPEAG	ES3DV3	SAR Probe	4/20/2010	Annual	4/20/2011	3209
Rohde & Schwarz	SMIQ03B	Signal Generator	4/1/2010	Annual	4/1/2011	DE27259
Rohde & Schwarz	CMW500	LTE Radio Communication Tester	8/30/2010	Annual	8/30/2011	100976
Anritsu	MA2481A	Power Sensor	12/2/2009	Annual	12/2/2010	5318
Anritsu	MA2481A	Power Sensor	12/3/2009	Annual	12/3/2010	5442
Anritsu	ML2438A	Power Meter	12/3/2009	Annual	12/3/2010	1190013
Anritsu	ML2438A	Power Meter	12/3/2009	Annual	12/3/2010	98150041
Agilent	8648D	Signal Generator	4/1/2010	Annual	4/1/2011	3629U00687
Anritsu	ML2438A	Power Meter	12/3/2009	Annual	12/3/2010	1070030
Anritsu	MA2481A	Power Sensor	12/2/2009	Annual	12/2/2010	5821
Anritsu	MA2481A	Power Sensor	12/3/2009	Annual	12/3/2010	8013
Anritsu	MA2481A	Power Sensor	12/3/2009	Annual	12/3/2010	2400
Apriel	ALS-PR-DIEL	Dielectric Probe Kit	N/A		N/A	260-00959
Agilent	E5515C	Wireless Communications Tester	4/14/2010	Annual	4/14/2011	US41140256
SPEAG	ES3DV3	SAR Probe	2/10/2010	Annual	2/10/2011	3173
Amplifier Research	5S1G4	5W, 800MHz-4.2GHz	N/A			17042

Justification for 2-year calibration cycle for SAR dipoles is found in Section 11.3.

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# 16 CONCLUSION

## 16.1 Measurement Conclusion



The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Industry Canada, 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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