



## CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

**APPLICANT NAME & ADDRESS:**  
 AIR PRIME, INC.  
 2290 Cosmos Court  
 Carlsbad, CA 92009  
 Attn: Jean-Philippe Kielsznia  
 Director, Hardware Engineering

**DATE & LOCATION OF TESTING:**  
 Dates of Tests: Nov. 25-27, 2002  
 Test Report S/N: 22/24.221125617.PNF  
 Test Site: PCTEST Lab, Columbia MD

|                   |                        |
|-------------------|------------------------|
| <b>FCC ID:</b>    | <b>PNF-PC3220P</b>     |
| <b>APPLICANT:</b> | <b>AIR PRIME, INC.</b> |

**EUT Type:** Dual-Band CDMA PCMCIA Modem Card  
**Tx Frequency:** 824.70 – 848.31 MHz (CDMA) / 1851.25 – 1908.75 MHz (PCS CDMA)  
**Rx Frequency:** 869.70 – 893.31 MHz (CDMA) / 1931.25 – 1988.75 MHz (PCS CDMA)  
**Max. RF Output Power:** 0.353 W ERP CDMA (25.473 dBm) / 23.5 dBm Conducted  
 0.348 W EIRP PCS CDMA (25.421 dBm) / 25.0 dBm Conducted  
**Max. SAR Measurement:** 1.34W/kg CDMA Body SAR; 1.26W/kg PCS CDMA Body SAR  
**Trade Name/Model(s):** PC3220  
**FCC Classification:** Part 24 Licensed Portable Transmitter worn on body (PCT)  
**FCC Rule Part(s):** §2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]  
**Application Type:** Certification  
**Test Device Serial No.:** identical prototype



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. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528-200X (Draft 6.5, Jan. 15, 2002).

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.*


**Alfred Cirwithian**  
 Vice President Engineering



|                                    |  |   |  |
|------------------------------------|--|---|--|
| <b>PCTEST™ SAR REPORT</b>          |  <b>FCC CERTIFICATION</b> |  | <b>Reviewed by:</b><br>Quality Manager     |
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# 1. INTRODUCTION / SAR DEFINITION

The FCC has adopted the guidelines for evaluating the environmental effects of radiofrequency 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*. (c) 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in *IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave*[3] is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in *Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields*, NCRP Report No. 86 (c) NCRP, 1986, Bethesda, MD 20814.[6] SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

## SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative (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).

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

where:

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

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

|                                    |  |   |   |                                 |
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## 2. SAR MEASUREMENT SETUP

### Robotic System

Measurements are performed using the DASY3 automated dosimetric assessment system. The DASY3 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Pentium III computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 2.1).

### 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 Micron Pentium III 500 MHz computer with Windows NT system and SAR Measurement Software DASY3, 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.

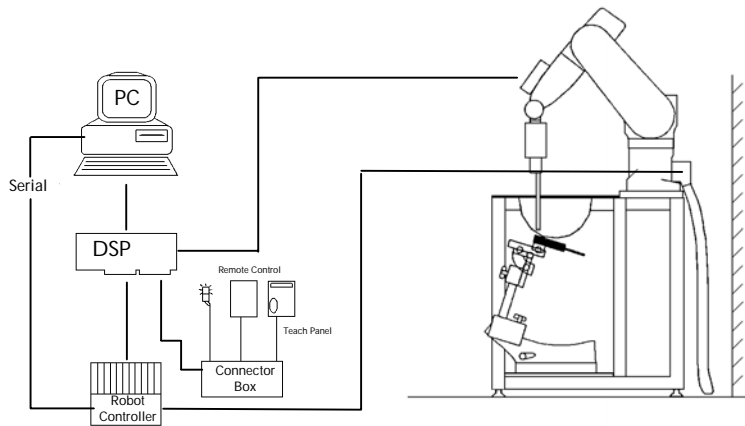


Figure 2.1 SAR Measurement System Setup

### System Electronics

The DAE3 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].

|                                    |                                 |   |                        |                                 |
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## 3. DASY3 E-FIELD PROBE SYSTEM

### Probe Measurement System



Figure 3.1 DAE System

The SAR measurements were conducted with the dosimetric probe ET3DV6, designed in the classical triangular configuration [7] (see Fig. 3.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip (see Fig. 3.3). 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 DASY3 software reads the reflection during a software approach and looks for the maximum using a 2<sup>nd</sup> order fitting (see Fig.3.1). The approach is stopped at reaching the maximum.

### Probe Specifications

- Calibration: In air from 10 MHz to 2.5 GHz  
In brain and muscle simulating tissue at  
Frequencies of 450 MHz, 835 MHz, 900 MHz  
1900MHz and 2450MHz
- Frequency: 10 MHz to > 3 GHz; Linearity: ± 0.2 dB  
(30 MHz to 3 GHz)
- Directivity: ± 0.2 dB in HSL (rotation around probe axis)  
± 0.4 dB in HSL (rotation normal probe axis)
- Dynamic: 5 :W/g to > 100 mW/g;
- Range: Linearity: ± 0.2 dB
- Dimensions: Overall length: 330 mm  
Tip length: 16 mm  
Body diameter: 12 mm  
Tip diameter: 6.8 mm  
Distance from probe tip to dipole centers: 2.7 mm
- Application: General dosimetry up to 3 GHz  
Compliance tests of mobile phones  
Fast automatic scanning in arbitrary phantoms

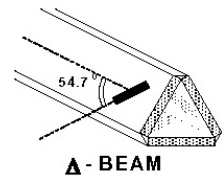


Figure 3.1 Triangular Probe Configuration



Figure 3.2 Probe Thick-Film Technique

|                                    |                                 |   |                        |                                 |
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## 4. Probe Calibration Process

### Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure described in [8] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [9] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe is tested.

### Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz (see Fig. 4.1), and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

### Temperature Assessment \*

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe (see Fig. 4.2).

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

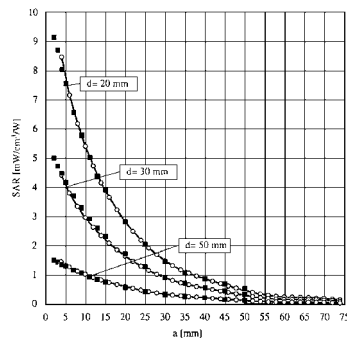
where:

$\Delta t$  = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

$\Delta T$  = temperature increase due to RF exposure.

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



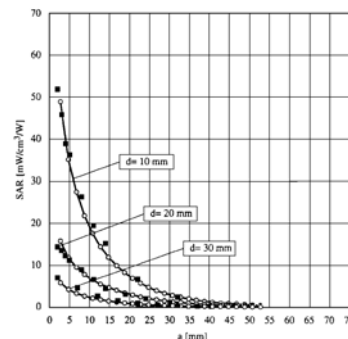
**Figure 4.1 E-Field and Temperature measurements at 900MHz [7]**

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

where:



$\sigma$  = simulated tissue conductivity,

$\rho$  = TISSUE density (1.25 g/cm<sup>3</sup> for brain tissue)



**Figure 4.2 E-Field and temperature measurements at 1.9GHz [7]**

\* NOTE: The temperature calibration was not performed by PCTEST. For information use only.

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## 5. PHANTOM & EQUIVALENT TISSUES

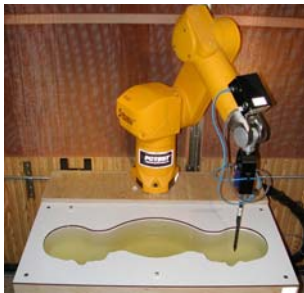
### SAM Phantom



**Figure 5.1 SAM Twin Phantom**

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. (see Fig. 5.1)

### Brain & Muscle Simulating Mixture Characterization



**Figure 5.2 Simulated Tissue**

The brain and muscle mixtures consist of a viscous gel using hydroxyethylcellulose (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 P1528 are derived from the issue 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 Fig. 5.2)

**Table 5.1 Composition of the Brain & Muscle Tissue Equivalent Matter**

| INGREDIENTS         |        | SIMULATING TISSUE |               |               |                |
|---------------------|--------|-------------------|---------------|---------------|----------------|
|                     |        | 835MHz Brain      | 835MHz Muscle | 1900MHz Brain | 1900MHz Muscle |
| Mixture Percentage  |        |                   |               |               |                |
| WATER               |        | 41.45             | 52.50         | 54.90         | 40.40          |
| DGBE                |        | 0.000             | 0.000         | 44.92         | 0.000          |
| SUGAR               |        | 56.00             | 45.00         | 0.000         | 58.00          |
| SALT                |        | 1.450             | 1.400         | 0.180         | 0.500          |
| BACTERIACIDE        |        | 0.100             | 0.100         | 0.000         | 0.100          |
| HEC                 |        | 1.000             | 1.000         | 0.000         | 1.000          |
| Dielectric Constant | Target | 41.50             | 55.20         | 40.00         | 53.30          |
| Conductivity (S/m)  | Target | 0.900             | 0.970         | 1.400         | 1.520          |



### Device Holder for Transmitters



**Figure 5.2 Mounting Device**

In combination with the SAM Twin Phantom V4.0, the Mounting Device (see Fig. 5.2) enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. The devices can be easily, accurately, and repeatably be positioned according to the FCC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

\* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations [12]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

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## 6. TEST SYSTEM SPECIFICATIONS

### Automated Test System Specifications

**Positioner**

**Robot:** Stäubli Unimation Corp. Robot Model: RX60L  
**Repeatability:** 0.02 mm  
**No. of axis:** 6



**Figure 6.1 DASY3 Test System**

**Data Acquisition Electronic (DAE) System**

**Cell Controller**

**Processor:** Pentium III  
**Clock Speed:** 450 MHz  
**Operating System:** Windows NT  
**Data Card:** DASY3 PC-Board

**Data Converter**

**Features:** Signal Amplifier, multiplexer, A/D converter, & control logic  
**Software:** DASY3 software  
**Connecting Lines:** Optical downlink for data and status info.  
 Optical uplink for commands and clock

**PC Interface Card**

**Function:** 24 bit (64 MHz) DSP for real time processing  
 Link to DAE3  
 16 bit A/D converter for surface detection system  
 serial link to robot  
 direct emergency stop output for robot

**E-Field Probes**

**Model:** ET3DV6 S/N: 1677  
**Construction:** Triangular core fiber optic detection system  
**Frequency:** 10 MHz to 6 GHz  
**Linearity:** ± 0.2 dB (30 MHz to 3 GHz)

**Phantom**

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

|                                    |                                 |   |                        |  |
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## 7. DOSIMETRIC ASSESSMENT & PHANTOM SPECS

### 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 location point was measured and used as a reference value.
2. The SAR distribution at the exposed side of the head was measured at a distance of 3.9mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20mm x 20mm.
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 34mm (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 Fig. 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 z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
  - b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions) [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 procedure #1, was re-measured. If the value changed by more than 5%, the evaluation is repeated.

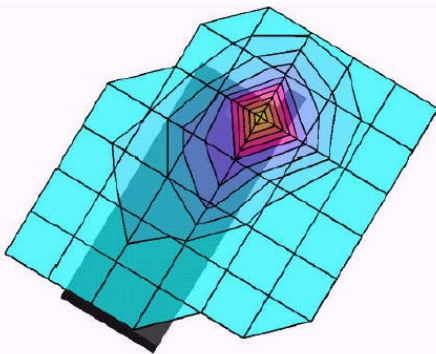


Figure 7.1 Sample SAR Area Scan

### 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 90<sup>th</sup> 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 Fig. 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.



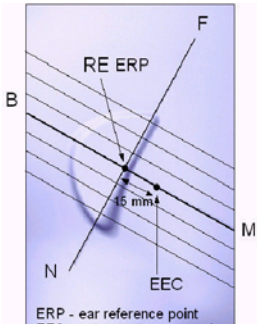
Figure 7.2 SAM Twin Phantom shell

|                                    |                                 |   |                        |                                 |
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## 8. DEFINITION OF REFERENCE POINTS

### EAR Reference Point

Figure 8.1 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERPs are 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 9.2. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 8.2). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].



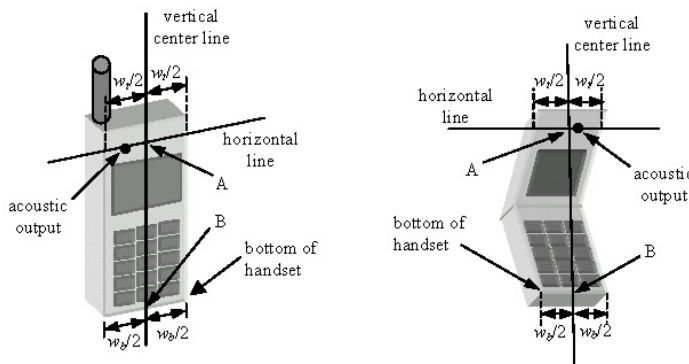
**Figure 8.2** Close-up side view of ERPs



**Figure 8.1** Front, back and side view of SAM Twin Phantom

### Handset Reference Points

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the "test device reference point" located along the "vertical centerline" on the front of the device aligned to the "ear reference point" (See Fig. 8.3). The "test device reference point" was then located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at it's top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.



**Figure 8.3** Handset Vertical Center & Horizontal Line Reference Points

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 10 of 32                   |

## 9. TEST CONFIGURATION POSITIONS

### Positioning for Cheek/Touch

- The test device was positioned with the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 9.1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.

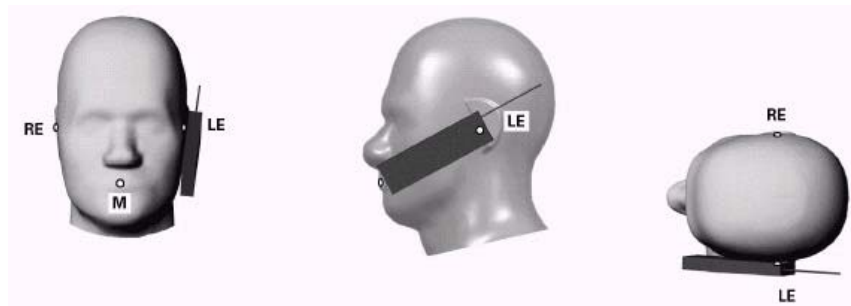


Figure 9.1 Front, Side and Top View of Cheek/Touch Position

- The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the ear.
- While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the plane normal to MB-NF including the line MB (reference plane).
- The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical with respect to the line NF.
- While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, the handset was rotated about the line NF until any point on the handset made contact with a phantom point below the ear (cheek). See Figure 9.2)

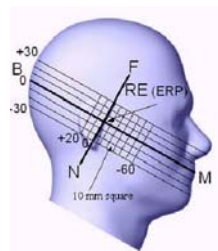


Figure 9.2 Side view w/ relevant markings

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 11 of 32                   |

## 9. TEST CONFIGURATION POSITIONS (Continued)

### Positioning for Ear / 15° Tilt

With the test device aligned in the "Cheek/Touch Position":

1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degree.
2. The phone was then rotated around the horizontal line by 15 degree.
3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the phone touches the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. The tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 9.3).

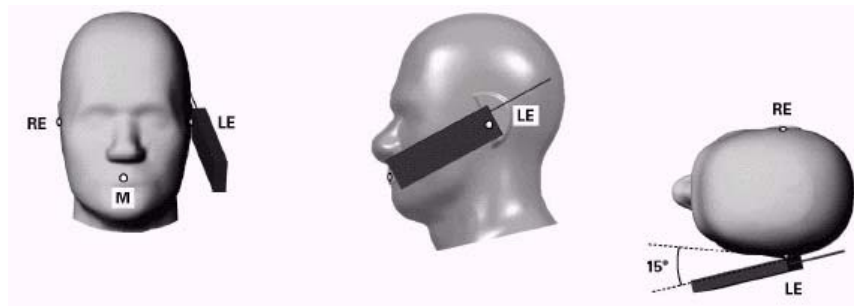


Figure 9.3 Front, Side and Top View of Ear/15° Tilt Position

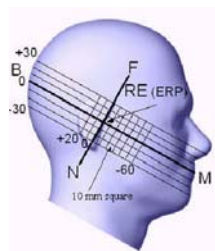


Figure 9.4 Side view w/ relevant markings

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 12 of 32                   |

## 9. TEST CONFIGURATION POSITIONS (Continued)

### Body Holster /Belt Clip Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 9.5). A device with a headset output is tested with a headset connected to the device. Body dielectric parameters are used.

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



**Figure 9.5 Body Belt Clip & Holster Configurations**

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

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

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

In order for users to be aware of the body-worn operating requirements for meeting RF exposure compliance, operating instructions and cautions statements are included in the user's manual.

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 13 of 32                   |

# 10. ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS

## 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.



## 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. Safety Limits for Partial Body Exposure [2]**

|  | HUMAN EXPOSURE LIMITS  |  |
|--|--|--|
|  | UNCONTROLLED ENVIRONMENT<br>General Population<br>(W/kg) or (mW/g) | CONTROLLED ENVIRONMENT<br>General Population<br>(W/kg) or (mW/g) |
| SPATIAL PEAK SAR <sup>1</sup><br>Brain                       | 1.60   | 8.00   |
| SPATIAL AVERAGE SAR <sup>2</sup><br>Whole Body               | 0.08   | 0.40   |
| SPATIAL PEAK SAR <sup>3</sup><br>Hands, Feet, Ankles, Wrists | 4.00   | 20.00  |

- 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.

|                                    |  |   |   |  |
|------------------------------------|--|---|---|--|
| <b>PCTEST™ SAR REPORT</b>          |  <b>FCC CERTIFICATION</b> |   |  | <b>Reviewed by:</b><br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P  | Page 14 of 32                          |

## 11. MEASUREMENT UNCERTAINTIES

| a   | b      | c             | d              | e=<br>f(d,k) | f                         | g                          | h =<br>cxf/e                     | i =<br>cxg/e                      | k              |
|---|--------|---------------|----------------|--------------|---------------------------|----------------------------|----------------------------------|-----------------------------------|----------------|
| Uncertainty<br>Component  | Sec.   | Tol.<br>(± %) | Prob.<br>Dist. | Div.         | c <sub>i</sub><br>(1 - g) | c <sub>i</sub><br>(10 - g) | 1 - g<br>u <sub>i</sub><br>(± %) | 10 - g<br>u <sub>i</sub><br>(± %) | v <sub>i</sub> |
| <b>Measurement System</b>   |        |               |                |              |                           |                            |                                  |                                   |                |
| Probe Calibration   | E1.1   | 6.0           | N              | 1            | 1                         | 1                          | 6.0                              | 6.0                               | ∞              |
| Axial Isotropy  | E1.2   | 4.88          | R              | √3           | 0.5                       | 0.5                        | 1.4                              | 1.4                               | ∞              |
| Hemishperical Isotropy  | E1.2   | 9.6           | R              | √3           | 0.5                       | 0.5                        | 2.8                              | 2.8                               | ∞              |
| Boundary Effect   | E1.3   | 11.0          | R              | √3           | 1                         | 1                          | 6.4                              | 6.4                               | ∞              |
| Linearity   | E1.4   | 4.7           | R              | √3           | 1                         | 1                          | 2.7                              | 2.7                               | ∞              |
| System Detection Limits   | E1.5   | 1.0           | R              | √3           | 1                         | 1                          | 0.6                              | 0.6                               | ∞              |
| Readout Electronics   | E1.6   | 1.0           | R              | 1            | 1                         | 1                          | 1.0                              | 1.0                               | ∞              |
| Response Time   | E1.7   | 0.8           | R              | √3           | 1                         | 1                          | 0.5                              | 0.5                               | ∞              |
| Integration Time  | E1.8   | 1.7           | R              | √3           | 1                         | 1                          | 1.0                              | 1.0                               | ∞              |
| RF Ambient Conditions   | E5.1   | 1.2           | R              | √3           | 1                         | 1                          | 0.7                              | 0.7                               | ∞              |
| Probe Positioner Mechanical Tolerance   | E5.2   | 0.4           | R              | √3           | 1                         | 1                          | 0.2                              | 0.2                               | ∞              |
| Probe Positioning w/ respect to Phantom                                       | E5.3   | 2.9           | R              | √3           | 1                         | 1                          | 1.7                              | 1.7                               | ∞              |
| Extrapolation, Interpolation & Integration Algorithms for Max. SAR Evaluation | E4.2   | 3.9           | R              | √3           | 1                         | 1                          | 2.3                              | 2.3                               | ∞              |
| <b>Test Sample Related</b>  |        |               |                |              |                           |                            |                                  |                                   |                |
| Test Sample Positioning   | E3.2.1 | 10.6          | R              | √3           | 1                         | 1                          | 6.1                              | 6.1                               | 11             |
| Device Holder Uncertainty   | E3.1.1 | 8.7           | R              | √3           | 1                         | 1                          | 5.0                              | 5.0                               | 8              |
| Output Power Variation - SAR drift measurement                                | 5.6.2  | 5.0           | R              | √3           | 1                         | 1                          | 2.9                              | 2.9                               | ∞              |
| <b>Phantom &amp; Tissue Parameters</b>  |        |               |                |              |                           |                            |                                  |                                   |                |
| Phantom Uncertainty (Shape & Thickness tolerances)                            | E2.1   | 4.0           | R              | √3           | 1                         | 1                          | 2.3                              | 2.1                               | ∞              |
| Liquid Conductivity - deviation from target values                            | E2.2   | 5.0           | R              | √3           | 0.7                       | 0.5                        | 2.0                              | 1.4                               | ∞              |
| Liquid Conductivity - measurement uncertainty                                 | E2.2   | 10.0          | R              | √3           | 0.7                       | 0.5                        | 4.0                              | 2.9                               | ∞              |
| Liquid Permittivity - deviation from target values                            | E2.2   | 5.0           | R              | √3           | 0.6                       | 0.5                        | 1.7                              | 1.4                               | ∞              |
| Liquid Permittivity - measurement uncertainty                                 | E2.2   | 5.0           | R              | √3           | 0.6                       | 0.5                        | 1.7                              | 1.4                               | ∞              |
| <b>Combined Standard Uncertainty (k=1)</b>                                    |        |               | RSS            |              |                           |                            | 14.4                             | 13.9                              |                |
| <b>Expanded Uncertainty (k=2)</b><br>(95% CONFIDENCE LEVEL)                   |        |               |                |              |                           |                            | 28.8                             | 27.8                              |                |

The above measurement uncertainties are according to IEEE Std. 1528-200x (July, 2001)

|                                    |                                 |   |                        |  |
|------------------------------------|---------------------------------|---|------------------------|--|
| <b>PCTEST™ SAR REPORT</b>          | <b>FCC CERTIFICATION</b>        |   |                        | <b>Reviewed by:</b><br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 15 of 32                          |

## 12. SYSTEM VERIFICATION

### Tissue Verification

**Table 12.1 Simulated Tissue Verification [5]**

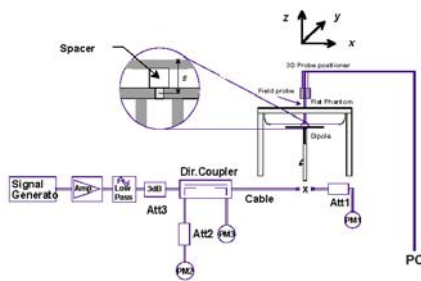
| MEASURED TISSUE PARAMETERS      |          |              |          |               |          |               |          |                |          |
|---------------------------------|----------|--------------|----------|---------------|----------|---------------|----------|----------------|----------|
| Date(s)                         | 11/25/02 | 835MHz Brain |          | 835MHz Muscle |          | 1900MHz Brain |          | 1900MHz Muscle |          |
| Liquid Temperature (°C)         | 19.2     | Target       | Measured | Target        | Measured | Target        | Measured | Target         | Measured |
| Dielectric Constant: $\epsilon$ |          | 41.50        | 40.60    | 55.20         | 54.00    | 40.00         | 39.70    | 53.30          | 54.90    |
| Conductivity: $\sigma$          |          | 0.900        | 0.910    | 0.970         | 0.960    | 1.400         | 1.440    | 1.520          | 1.550    |

### Test System Validation

Prior to assessment, the system is verified to the  $\pm 10\%$  of the specifications at 835MHz and 1900MHz by using the system validation kit(s). (Graphic Plots Attached)

**Table 12.2 System Validation [5]**

| SYSTEM DIPOLE VALIDATION TARGET & MEASURED   |                  |  |   |  |
|--|------------------|--|---|--|
| System Validation Kit:<br>D-835V2, S/N: 406  | 835MHz<br>Brain  | Targeted SAR <sub>1g</sub> (mW/g)<br>2.375 | Measured SAR <sub>1g</sub> (mW/g)<br><span style="color: blue;">2.43</span> | Deviation (%)<br><span style="color: blue;">+ 2.3</span> |
| System Validation Kit:<br>D-1900V2, S/N: 502 | 1900MHz<br>Brain | Targeted SAR <sub>1g</sub> (mW/g)<br>9.925 | Measured SAR <sub>1g</sub> (mW/g)<br><span style="color: blue;">9.86</span> | Deviation (%)<br><span style="color: blue;">- 0.7</span> |



**Figure 12.1 Dipole Validation Test Setup**

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| <b>PCTEST™ SAR REPORT</b>          | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 16 of 32                   |



# 13. SAR TEST DATA SUMMARY



[See Measurement Result Data Pages](#)

## Procedures Used To Establish Test Signal

The handset was placed into simulated call mode (AMPS, Cellular CDMA & PCS CDMA modes) using manufacturers test codes. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [4]. When test modes are not available or inappropriate for testing a handset, the actual transmission is activated through a base station simulator or similar equipment. See data pages for actual procedure used in measurement.

## Device Test Conditions

The handset is battery operated. Each SAR measurement was taken with a fully charged battery. In order to verify that the device was tested at full power, conducted output power measurements were performed before and after each SAR measurement to confirm the output power. If a conducted power deviation of more than 5% occurred, the test was repeated.

|                                    |  |   |   |  |
|------------------------------------|--|---|---|--|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |  | <b>Reviewed by:</b><br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P  | Page 17 of 32                          |

# SAR DATA SUMMARY

Mixture Type: 835MHz Muscle

| 14.1 MEASUREMENT RESULTS (CDMA Body SAR w/ Fujitsu Laptop)  |      |            |                                |      |          |   |                  |            |
|---|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup>            | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 824.70  | 1013 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Up               | 1.310      |
| 824.70  | 1013 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Down             | 0.791      |
| 836.52  | 0384 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Up               | 1.340      |
| 836.52  | 0384 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Down             | 0.654      |
| 848.31  | 0777 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Up               | 1.200      |
| 848.31  | 0777 | CDMA       | 23.5                           | 23.5 | Standard | Touching  | Down             | 0.778      |
| ANSI / IEEE C95.1 1992 - SAFETY LIMIT<br>Spatial Peak<br>Uncontrolled Exposure/General Population |      |            |                                |      |          | Muscle<br>1.6 W/kg (mW/g)<br>averaged over 1 gram |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard Batteries are the only options.
4. SAR Measurement System
 

|  |   |  |                                     |
|--|---|--|-------------------------------------|
| <input checked="" type="checkbox"/> Power Measured         | <input checked="" type="checkbox"/> Conducted | <input type="checkbox"/> ERP                     | <input type="checkbox"/> EIRP       |
| <input checked="" type="checkbox"/> SAR Measurement System | <input checked="" type="checkbox"/> DASY3     | <input type="checkbox"/> IDX                     |                                     |
| <input type="checkbox"/> Phantom Configuration             | <input type="checkbox"/> Left Head            | <input checked="" type="checkbox"/> Flat Phantom | <input type="checkbox"/> Right Head |
| <input type="checkbox"/> SAR Configuration                 | <input type="checkbox"/> Head                 | <input checked="" type="checkbox"/> Body         | <input type="checkbox"/> Hand       |
5. Test Signal Call Mode
 



|  |   |
|--|---|
| <input checked="" type="checkbox"/> Manu. Test Codes | <input type="checkbox"/> Base Station Simulator |
|--|---|
6. <sup>\*\*</sup>Test Configuration
 

|                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> With Holster | <input checked="" type="checkbox"/> Without Holster |
|---------------------------------------|---|
7. Tissue parameters and temperatures are listed on the SAR plots.
8. Both sides of the phone were tested and the worst-case side is reported.
9. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
 Vice President Engineering



**Figure 14.1 Body SAR Test Setup  
-- Lap Configuration --**

|                                    |   |   |                        |   |                                 |
|------------------------------------|---|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  FCC CERTIFICATION |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002   | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 18 of 32   |                                 |

## SAR DATA SUMMARY (Continued)

Mixture Type: 835MHz Muscle

| 14.2 MEASUREMENT RESULTS (CDMA Body SAR w/ Fujitsu Laptop)  |      |            |                                |      |          |   |                  |            |
|---|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup>            | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 824.70  | 1013 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Up               | 0.124      |
| 824.70  | 1013 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Down             | 0.055      |
| 836.52  | 0384 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Up               | 0.122      |
| 836.52  | 0384 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Down             | 0.044      |
| 848.31  | 0777 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Up               | 0.102      |
| 848.31  | 0777 | CDMA       | 23.5                           | 23.5 | Standard | 1.5   | Down             | 0.059      |
| ANSI / IEEE C95.1 1992 - SAFETY LIMIT<br>Spatial Peak<br>Uncontrolled Exposure/General Population |      |            |                                |      |          | Muscle<br>1.6 W/kg (mW/g)<br>averaged over 1 gram |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>**</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

Alfred

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Vice President Engineering



**Figure 14.2 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |                                 |   |                        |               |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        |               | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 19 of 32 |                                 |

## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| <b>14.3 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Fujitsu Laptop)</b>                             |      |            |                                |      |          |  |                  |            |
|---|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup>                   | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Up               | 0.655      |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Down             | 1.190      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Up               | 0.520      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Down             | 1.090      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Up               | 0.389      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching   | Down             | 0.771      |
| ANSI / IEEE C95.1 1992 - SAFETY LIMIT<br>Spatial Peak<br>Uncontrolled Exposure/General Population |      |            |                                |      |          | Muscle<br><b>1.6 W/kg (mW/g)</b><br>averaged over 1 gram |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard Batteries are the only options.
4. SAR Measurement System
 

|                       |  |   |                                     |
|-----------------------|--|---|-------------------------------------|
| †Power Measured       | <input checked="" type="checkbox"/> Conducted        | <input type="checkbox"/> ERP                        | <input type="checkbox"/> EIRP       |
| Phantom Configuration | <input checked="" type="checkbox"/> DASY3            | <input type="checkbox"/> IDX                        |                                     |
| SAR Configuration     | <input type="checkbox"/> Left Head                   | <input checked="" type="checkbox"/> Flat Phantom    | <input type="checkbox"/> Right Head |
| Test Signal Call Mode | <input type="checkbox"/> Head                        | <input checked="" type="checkbox"/> Body            | <input type="checkbox"/> Hand       |
| ††Test Configuration  | <input checked="" type="checkbox"/> Manu. Test Codes | <input type="checkbox"/> Base Station Simulator     |                                     |
|                       | <input type="checkbox"/> With Holster                | <input checked="" type="checkbox"/> Without Holster |                                     |
5. Tissue parameters and temperatures are listed on the SAR plots.
6. Both sides of the phone were tested and the worst-case side is reported.
7. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
 Vice President Engineering



**Figure 14.3 Body SAR Test Setup  
-- Lap Configuration --**

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | FCC CERTIFICATION               |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 20 of 32                   |

## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| <b>14.4 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Fujitsu Laptop)</b>  |      |            |                                |      |          |   |                  |            |
|--|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>††</sup>                          | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Up               | 0.983      |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Down             | 1.260      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Up               | 0.883      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Down             | 0.927      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Up               | 0.967      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5   | Down             | 0.916      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b><br><b>Spatial Peak</b><br><b>Uncontrolled Exposure/General Population</b> |      |            |                                |      |          | <b>Muscle</b><br><b>1.6 W/kg (mW/g)</b><br>averaged over 1 gram |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>††</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1



  


---

**Alfred Cirwithian**  
**Vice President Engineering**



**Figure 14.4 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |  |   |                        |   |                                 |
|------------------------------------|--|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 21 of 32   |                                 |

# SAR DATA SUMMARY

Mixture Type: 835MHz Muscle

| <b>14.5 MEASUREMENT RESULTS (CDMA Body SAR w/ Panasonic Laptop)</b>  |      |            |                                |      |          |   |                  |            |
|--|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>††</sup>                          | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.550      |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.497      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.241      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.313      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.501      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.494      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b><br><b>Spatial Peak</b><br><b>Uncontrolled Exposure/General Population</b> |      |            |                                |      |          | <b>Muscle</b><br><b>1.6 W/kg (mW/g)</b><br>averaged over 1 gram |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |  |   |                                     |
|-------------------------------------|--|---|-------------------------------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> Conducted        | <input type="checkbox"/> ERP                        | <input type="checkbox"/> EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> DASY3            | <input type="checkbox"/> IDX                        |                                     |
| Phantom Configuration               | <input type="checkbox"/> Left Head                   | <input checked="" type="checkbox"/> Flat Phantom    | <input type="checkbox"/> Right Head |
| 5. SAR Configuration                | <input type="checkbox"/> Head                        | <input checked="" type="checkbox"/> Body            | <input type="checkbox"/> Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> Manu. Test Codes | <input type="checkbox"/> Base Station Simulator     |                                     |
| 7. <sup>††</sup> Test Configuration | <input type="checkbox"/> With Holster                | <input checked="" type="checkbox"/> Without Holster |                                     |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

  
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**Vice President Engineering**



**Figure 14.5 Body SAR Test Setup  
-- Lap Configuration --**

|                                    |  |   |                        |   |                                 |
|------------------------------------|--|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 22 of 32   |                                 |

## SAR DATA SUMMARY (Continued)

Mixture Type: 835MHz Muscle

| <b>14.6 MEASUREMENT RESULTS (CDMA Body SAR w/ Panasonic Laptop)</b> |      |            |                                |      |          |  |                  |            |
|---|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup> | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 824.70  | 1013 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.120      |
| 824.70  | 1013 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.110      |
| 836.52  | 0384 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.143      |
| 836.52  | 0384 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.094      |
| 848.31  | 0777 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.118      |
| 848.31  | 0777 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.117      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>                        |      |            |                                |      |          | <b>Muscle</b>                          |                  |            |
| <b>Spatial Peak</b>   |      |            |                                |      |          | <b>1.6 W/kg (mW/g)</b>                 |                  |            |
| <b>Uncontrolled Exposure/General Population</b>                     |      |            |                                |      |          | averaged over 1 gram                   |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>**</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

  
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**Figure 14.6 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |  |   |   |                                 |
|------------------------------------|--|---|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P  | Page 23 of 32                   |

## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| <b>14.7 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Panasonic Laptop)</b> |      |            |                                |      |          |  |                  |            |
|---|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup> | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Up               | 0.282      |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Down             | 0.811      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Up               | 0.177      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Down             | 0.509      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Up               | 0.219      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching                               | Down             | 0.512      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>                            |      |            |                                |      |          | <b>Muscle</b>                          |                  |            |
| <b>Spatial Peak</b>   |      |            |                                |      |          | <b>1.6 W/kg (mW/g)</b>                 |                  |            |
| <b>Uncontrolled Exposure/General Population</b>                         |      |            |                                |      |          | averaged over 1 gram                   |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard Batteries are the only options.
4. SAR Measurement System
 

|  |   |  |                                     |
|--|---|--|-------------------------------------|
| <input checked="" type="checkbox"/> Power Measured         | <input checked="" type="checkbox"/> Conducted | <input type="checkbox"/> ERP                     | <input type="checkbox"/> EIRP       |
| <input checked="" type="checkbox"/> SAR Measurement System | <input checked="" type="checkbox"/> DASY3     | <input type="checkbox"/> IDX                     |                                     |
| <input type="checkbox"/> Phantom Configuration             | <input type="checkbox"/> Left Head            | <input checked="" type="checkbox"/> Flat Phantom | <input type="checkbox"/> Right Head |
| <input type="checkbox"/> SAR Configuration                 | <input type="checkbox"/> Head                 | <input checked="" type="checkbox"/> Body         | <input type="checkbox"/> Hand       |
5. Test Signal Call Mode
 



|  |   |
|--|---|
| <input checked="" type="checkbox"/> Manu. Test Codes | <input type="checkbox"/> Base Station Simulator |
|--|---|
6. <sup>\*\*</sup>Test Configuration
 

|                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> With Holster | <input checked="" type="checkbox"/> Without Holster |
|---------------------------------------|---|
7. Tissue parameters and temperatures are listed on the SAR plots.
8. Both sides of the phone were tested and the worst-case side is reported.
9. Liquid tissue depth is 15.1 cm. ± 0.1

  
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**Vice President Engineering**



**Figure 14.7 Body SAR Test Setup -- Lap Configuration --**

|                                    |  |   |                        |   |                                 |
|------------------------------------|--|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 24 of 32   |                                 |



## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| <b>14.8 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Panasonic Laptop)</b> |      |            |                                |      |          |  |                  |            |
|---|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY   |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup> | Antenna Position | SAR (W/kg) |
| MHz   | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 0.959      |
| 1851.25   | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 1.090      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 0.975      |
| 1880.00   | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 0.923      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 0.939      |
| 1908.75   | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 0.989      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>                            |      |            |                                |      |          | <b>Muscle</b>                          |                  |            |
| <b>Spatial Peak</b>   |      |            |                                |      |          | <b>1.6 W/kg (mW/g)</b>                 |                  |            |
| <b>Uncontrolled Exposure/General Population</b>                         |      |            |                                |      |          | averaged over 1 gram                   |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>**</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
**Vice President Engineering**



**Figure 14.8 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |  |   |                        |   |                                 |
|------------------------------------|--|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 25 of 32   |                                 |

# SAR DATA SUMMARY

Mixture Type: 835MHz Muscle

| <b>14.9 MEASUREMENT RESULTS (CDMA Body SAR w/ Winbook Laptop)</b>  |      |            |                                |      |          |   |                  |            |
|--|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>††</sup>                          | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.393      |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.174      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.369      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.138      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Up               | 0.383      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | Touching  | Down             | 0.209      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b><br><b>Spatial Peak</b><br><b>Uncontrolled Exposure/General Population</b> |      |            |                                |      |          | <b>Muscle</b><br><b>1.6 W/kg (mW/g)</b><br>averaged over 1 gram |                  |            |

**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>††</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

Alfred

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**Figure 14.9 Body SAR Test Setup  
-- Lap Configuration --**

|                                    |                                 |   |                        |                                 |
|------------------------------------|---------------------------------|---|------------------------|---------------------------------|
| PCTEST™ SAR REPORT                 | <b>FCC CERTIFICATION</b>        |   |                        | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002 | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 26 of 32                   |

## SAR DATA SUMMARY (Continued)

Mixture Type: 835MHz Muscle

| <b>14.10 MEASUREMENT RESULTS (CDMA Body SAR w/ Winbook Laptop)</b> |      |            |                                |      |          |  |                  |            |
|--|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup> | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.152      |
| 824.70   | 1013 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.027      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.161      |
| 836.52   | 0384 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.027      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Up               | 0.166      |
| 848.31   | 0777 | CDMA       | 23.0                           | 23.0 | Standard | 1.5                                    | Down             | 0.030      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>                       |      |            |                                |      |          | <b>Muscle</b>                          |                  |            |
| <b>Spatial Peak</b>  |      |            |                                |      |          | <b>1.6 W/kg (mW/g)</b>                 |                  |            |
| <b>Uncontrolled Exposure/General Population</b>                    |      |            |                                |      |          | averaged over 1 gram                   |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>**</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
 Vice President Engineering



**Figure 14.10 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |  |   |   |                                 |
|------------------------------------|--|---|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P  | Page 27 of 32                   |

## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| 14.11 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Winbook Laptop)  |      |            |                                |      |          |   |                  |            |
|--|------|------------|--------------------------------|------|----------|---|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup>                          | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |   |                  |            |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Up               | 0.131      |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Down             | 0.216      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Up               | 0.120      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Down             | 0.170      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Up               | 0.126      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | Touching  | Down             | 0.215      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b><br><b>Spatial Peak</b><br><b>Uncontrolled Exposure/General Population</b> |      |            |                                |      |          | <b>Muscle</b><br><b>1.6 W/kg (mW/g)</b><br>averaged over 1 gram |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
2. All modes of operation were investigated, and worst-case results are reported.
3. Battery is fully charged for all readings. Standard Batteries are the only options.
4. SAR Measurement System
  - Power Measured
  - Conducted
  - ERP
  - EIRP
  - SAR Measurement System
  - DASY3
  - IDX
5. Phantom Configuration
  - Left Head
  - Flat Phantom
  - Right Head
6. SAR Configuration
  - Head
  - Body
  - Hand
7. Test Signal Call Mode
  - Manu. Test Codes
  - Base Station Simulator
8. <sup>\*\*</sup>Test Configuration
  - With Holster
  - Without Holster
9. Tissue parameters and temperatures are listed on the SAR plots.
10. Both sides of the phone were tested and the worst-case side is reported.
11. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
 Vice President Engineering



**Figure 14.11 Body SAR Test Setup -- Lap Configuration --**

|                                    |   |   |                        |   |                                 |
|------------------------------------|---|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  FCC CERTIFICATION |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002   | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 28 of 32   |                                 |

## SAR DATA SUMMARY (Continued)

Mixture Type: 1900MHz Muscle

| <b>14.12 MEASUREMENT RESULTS (PCS CDMA Body SAR w/ Winbook Laptop)</b> |      |            |                                |      |          |  |                  |            |
|--|------|------------|--------------------------------|------|----------|--|------------------|------------|
| FREQUENCY  |      | Modulation | Begin / End POWER <sup>†</sup> |      |          | Separation Distance (cm) <sup>**</sup> | Antenna Position | SAR (W/kg) |
| MHz  | Ch.  |            | (dBm)                          |      | Battery  |  |                  |            |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 1.170      |
| 1851.25  | 0025 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 1.140      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 0.893      |
| 1880.00  | 0600 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 0.822      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Up               | 0.941      |
| 1908.75  | 1175 | CDMA       | 25.0                           | 25.0 | Standard | 1.5                                    | Down             | 0.914      |
| <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT</b>                           |      |            |                                |      |          | <b>Muscle</b>                          |                  |            |
| <b>Spatial Peak</b>  |      |            |                                |      |          | <b>1.6 W/kg (mW/g)</b>                 |                  |            |
| <b>Uncontrolled Exposure/General Population</b>                        |      |            |                                |      |          | averaged over 1 gram                   |                  |            |



**NOTES:**

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
  2. All modes of operation were investigated, and worst-case results are reported.
  3. Battery is fully charged for all readings. Standard Batteries are the only options.
- |                                     |                                     |                  |                                     |                        |                          |            |
|-------------------------------------|-------------------------------------|------------------|-------------------------------------|------------------------|--------------------------|------------|
| <sup>†</sup> Power Measured         | <input checked="" type="checkbox"/> | Conducted        | <input type="checkbox"/>            | ERP                    | <input type="checkbox"/> | EIRP       |
| 4. SAR Measurement System           | <input checked="" type="checkbox"/> | DASY3            | <input type="checkbox"/>            | IDX                    |                          |            |
| Phantom Configuration               | <input type="checkbox"/>            | Left Head        | <input checked="" type="checkbox"/> | Flat Phantom           | <input type="checkbox"/> | Right Head |
| 5. SAR Configuration                | <input type="checkbox"/>            | Head             | <input checked="" type="checkbox"/> | Body                   | <input type="checkbox"/> | Hand       |
| 6. Test Signal Call Mode            | <input checked="" type="checkbox"/> | Manu. Test Codes | <input type="checkbox"/>            | Base Station Simulator |                          |            |
| 7. <sup>**</sup> Test Configuration | <input type="checkbox"/>            | With Holster     | <input checked="" type="checkbox"/> | Without Holster        |                          |            |
8. Tissue parameters and temperatures are listed on the SAR plots.
  9. Both sides of the phone were tested and the worst-case side is reported.
  10. Liquid tissue depth is 15.1 cm. ± 0.1

  
**Alfred Cirwithian**  
**Vice President Engineering**



**Figure 14.12 Body SAR Test Setup  
-- Bystander Configuration --**

|                                    |  |   |                        |   |                                 |
|------------------------------------|--|---|------------------------|---|---------------------------------|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |                        |  | Reviewed by:<br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P | Page 29 of 32   |                                 |

## 15. SAR TEST EQUIPMENT



### Equipment Calibration

**Table 15.1 Test Equipment Calibration**

| EQUIPMENT SPECIFICATIONS                         |                    |               |                     |
|--|--------------------|---------------|---------------------|
| Type   | Calibration Date   | Serial Number |                     |
| Stäubli Robot RX60L                              | February 2002      | 599131-01     |                     |
| Stäubli Robot Controller                         | February 2002      | PCT592        |                     |
| Stäubli Teach Pendant (Joystick)                 | February 2002      | 3323-00161    |                     |
| Micron Computer, 450 MHz Pentium III, Windows NT | February 2002      | PCT577        |                     |
| SPEAG EDC3                                       | February 2002      | 321           |                     |
| SPEAG DAE3                                       | February 2002      | 330           |                     |
| SPEAG E-Field Probe ET3DV6                       | April 2002         | 1677          |                     |
| SPEAG Dummy Probe                                | February 2002      | PCT583        |                     |
| SPEAG SAM Twin Phantom V4.0                      | February 2002      | PCT666        |                     |
| SPEAG Light Alignment Sensor                     | February 2002      | 205           |                     |
| PCTEST Validation Dipole D300V2                  | September 2002     | PCT301        |                     |
| SPEAG Validation Dipole D835V2                   | February 2002      | PCT512        |                     |
| SPEAG Validation Dipole D1900V2                  | February 2002      | PCT613        |                     |
| Brain Equivalent Matter (300MHz)                 | November 2002      | PCTBEM601     |                     |
| Brain Equivalent Matter (835MHz)                 | November 2002      | PCTBEM101     |                     |
| Brain Equivalent Matter (1900MHz)                | November 2002      | PCTBEM301     |                     |
| Muscle Equivalent Matter (300MHz)                | November 2002      | PCTMEM701     |                     |
| Muscle Equivalent Matter (835MHz)                | November 2002      | PCTMEM201     |                     |
| Muscle Equivalent Matter (1900MHz)               | November 2002      | PCTMEM401     |                     |
| Microwave Amp. Model: 5S1G4, (800MHz - 4.2GHz)   | January 2002       | 22332         |                     |
| Gigatronics 8651A Power Meter                    | January 2002       | 1835299       |                     |
| HP-8648D (9kHz ~ 4GHz) Signal Generator          | January 2002       | PCT530        |                     |
| Amplifier Research 5S1G4 Power Amp               | January 2002       | PCT540        |                     |
| HP-8753E (30kHz ~ 3GHz) Network Analyzer         | January 2002       | PCT552        |                     |
| HP85070B Dielectric Probe Kit                    | January 2002       | PCT501        |                     |
| Ambient Noise/Reflection, etc.                   | <12mW/kg/<3%of SAR | January 2002  | Anechoic Room PCT01 |

**NOTE:**

The E-field probe was calibrated by SPEAG, by temperature measurement procedure. Dipole Validation measurement is performed by PCTEST Lab. before each test. 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.



|                                    |   |   |  |
|------------------------------------|---|---|--|
| <b>PCTEST™ SAR REPORT</b>          | <b>FCC CERTIFICATION</b>  |   | <b>Reviewed by:</b><br>Quality Manager             |
| SAR Filename:<br>SAR-221125617.PNF | <br><b>Test Dates:</b><br>Nov. 25-27, 2002 | <br><b>EUT TYPE:</b> Dual-Band<br>CDMA PCMCIA Modem Card | <b>FCC ID:</b><br>PNF-PC3220P<br><br>Page 30 of 32 |

# 16. CONCLUSION

## Measurement Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test 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 innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.[3]

|                                    |  |   |   |  |
|------------------------------------|--|---|---|--|
| PCTEST™ SAR REPORT                 |  <b>FCC CERTIFICATION</b> |   |  | <b>Reviewed by:</b><br>Quality Manager |
| SAR Filename:<br>SAR-221125617.PNF | Test Dates:<br>Nov. 25-27, 2002  | EUT TYPE: Dual-Band<br>CDMA PCMCIA Modem Card | FCC ID:<br>PNF-PC3220P  | Page 31 of 32                          |

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