RF Exposure Lab

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CERTIFICATE OF COMPLIANCE
SAR EVALUATION

Iridium Satellite LLC	Dates of Test: March 30-31, 2017
1750 Tysons Blvd., Suite 1400	Test Report Number: SAR.20170313
McLean, VA 22102	Revision A

FCC ID:	Q639575N
IC Certificate:	4629A-9575N
Model(s):	9575E
Test Sample:	Engineering Unit Same as Production
Serial No.:	FP2-01
Equipment Type:	Satellite Phone
Classification:	Portable Transmitter Next to Head and Body
TX Frequency Range:	1616 – 1626 MHz
Frequency Tolerance:	± 2.5 ppm
Maximum RF Output:	1621 MHz – 37.7 dBm Conducted
Signal Modulation:	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)
Antenna Type:	Extendable Stub
Application Type:	Certification
FCC Rule Parts:	Part 25
KDB Test Methodology:	KDB 447498 D01 v06, KDB 648474 D01 v01r05 & D04 v01r01, KDB 643646 D01 v01r03
Industry Canada:	RSS-102 Issue 5 Draft, Safety Code 6
Max. Stand Alone SAR Value:	0.67 W/kg Reported Head; 0.15 W/kg Reported Body
Separation Distance:	0 mm

This wireless mobile and/or portable device has been shown to be compliant for localized specific absorption rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and IEC 62209-2:2010 (See test report).

I attest to the accuracy of the data. All measurements were performed by myself 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.

RF Exposure Lab, LLC certifies that no party to this application has been denied FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).

Jay M. Moulton
Vice President

ACCREDITED
Testing Cert. # 2387.01

Table of Contents

1. Introduction

This measurement report shows compliance of the Iridium Satellite LLC Model 9575E FCC ID: Q639575N with FCC Part 2, 1093, ET Docket 93-62 Rules for mobile and portable devices and IC Certificate: 4629A-9575N with RSS102 Issue 5 Draft & Safety Code 6. The FCC have adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on August 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC regulated portable devices. [1], [6]

The test results recorded herein are based on a single type test of Iridium Satellite LLC Model 9575E and therefore apply only to the tested sample.

The test procedures, as described in ANSI C95.1 – 1999 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [2], ANSI C95.3 – 2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields [3], IEEE Std.1528 – 2003 Recommended Practice [4], and Industry Canada Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz were employed.

The following table indicates all the wireless technologies operating in the 9575E wireless Satellite Phone. The table also shows the tolerance for the power level for each mode.

Band	Modulation	3GPP Nominal Power dBm	Setpoint Nominal Power dBm	Tolerance dBm	Lower Tolerance dBm	Upper Tolerance dBm
1620 MHz	25ksps DE-QPSK with RRC Filtering (Alpha-0.4)	N/A	N/A	N/A	N/A	37.7

SAR Definition [5]

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (*dW*) absorbed by (dissipated in) an incremental mass (*dm*) contained in a volume element (*dV*) of a given density (ρ).

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

SAR is expressed in units of watts per kilogram (W/kg). *SAR* can be related to the electric field at a point by

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

where:

σ = conductivity of the tissue (S/m)

ρ = mass density of the tissue (kg/m^3)

E = rms electric field strength (V/m)

2. SAR Measurement Setup

Robotic System

These measurements are performed using the DASY52 automated dosimetric assessment system. The DASY52 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Intel Core2 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 HP Intel Core2 computer with Windows XP system and SAR Measurement Software DASY52, 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.

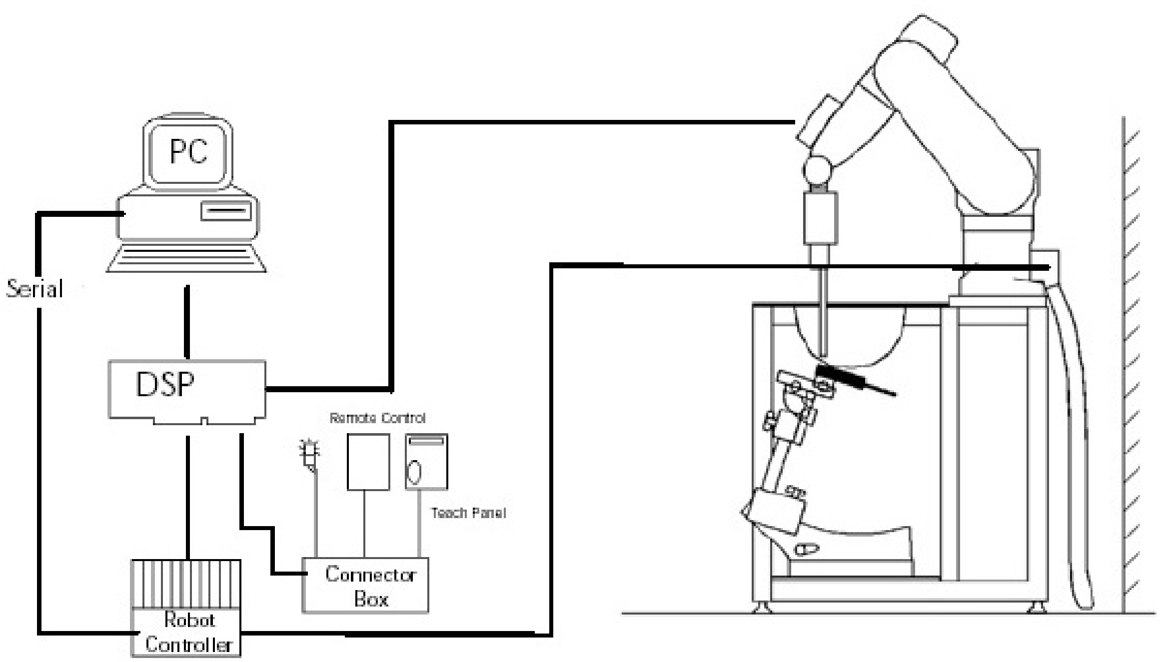


Figure 2.1 SAR Measurement System Setup

System Electronics

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

Probe Measurement System

The SAR measurements were conducted with the dosimetric probe EX3DV4, designed in the classical triangular configuration (see Fig. 2.2) 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 multi fiber line ending at the front of the probe tip. (see Fig. 2.3) 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 DASY52 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.

DAE System

Probe Specifications

Calibration: In air from 10 MHz to 6.0 GHz
In brain and muscle simulating tissue at Frequencies of 450 MHz, 835 MHz, 1750 MHz, 1900 MHz, 2450 MHz, 2600 MHz, 3500 MHz, 5200 MHz, 5300 MHz, 5600 MHz, 5800 MHz

Frequency: 10 MHz to 6 GHz

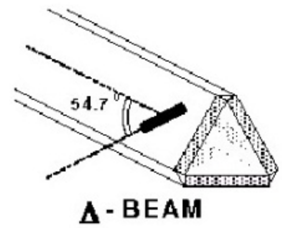


Figure 2.2 Triangular Probe Configurations

Linearity: ±0.2dB (30 MHz to 6 GHz)

Dynamic: 10 mW/kg to 100 W/kg

Range: Linearity: ±0.2dB

Dimensions: Overall length: 330 mm

Tip length: 20 mm

Body diameter: 12 mm

Tip diameter: 2.5 mm

Distance from probe tip to sensor center: 1 mm

Figure 2.3 Probe Thick-Film Technique

Application: SAR Dosimetry Testing
Compliance tests of wireless device

Probe Calibration Process

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure described in with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in and found to be better than +/-0.25dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) 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, and in a waveguide above 1GHz 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 until the three channels show the maximum reading. The power density readings equates to 1 mW/cm^2.

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

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

where:

Δt = exposure time (30 seconds),

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

ΔT = temperature increase due to RF exposure.

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

where:

σ = simulated tissue conductivity,

ρ = Tissue density (1.25 g/cm^3 for brain tissue)

SAR is proportional to ΔT / Δt , 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;

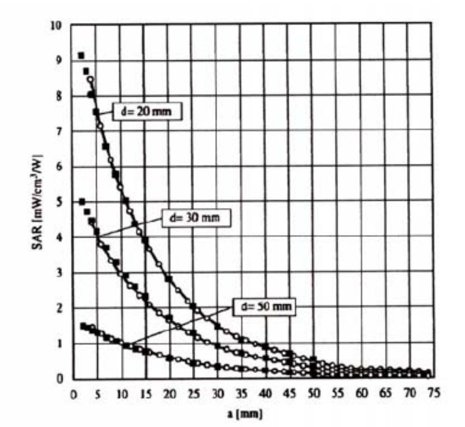


Figure 2.4 E-Field and Temperature Measurements at 900MHz

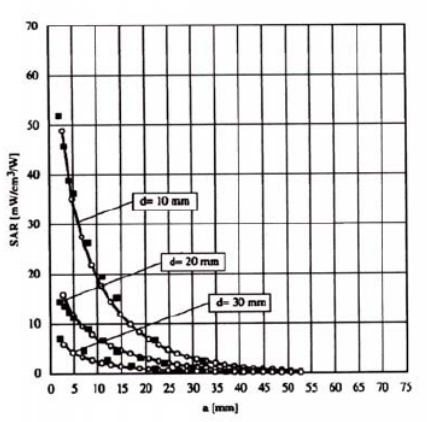


Figure 2.5 E-Field and Temperature Measurements at 1800MHz

Data Extrapolation

The DASY52 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

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

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

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

E-field probes:

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

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

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

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

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

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

with SAR = local specific absorption rate in W/g
E_{tot} = total field strength in V/m
σ = conductivity in [mho/m] or [Siemens/m]
ρ = equivalent tissue density in g/cm^3

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

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

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

Scanning procedure

- The DASY installation includes predefined files with recommended procedures for measurements and system check. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

- The „reference“ and „drift“ measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max. +/- 5 %.

- The highest integrated SAR value is the main concern in compliance test applications. These values can mostly be found at the inner surface of the phantom and cannot be measured directly due to the sensor offset in the probe. To extrapolate the surface values, the measurement distances to the surface must be known accurately. A distance error of 0.5mm could produce SAR errors of 6% at 1800 MHz. Using predefined locations for measurements is not accurate enough. Any shift of the phantom (e.g., slight deformations after filling it with liquid) would produce high uncertainties. For an automatic and accurate detection of the phantom surface, the DASY5 system uses the mechanical surface detection. The detection is always at touch, but the probe will move backward from the surface the indicated distance before starting the measurement.

- The „area scan“ measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The scan uses different grid spacings for different frequency measurements. Standard grid spacing for head measurements in frequency ranges ≤ 2GHz is 15 mm in x - and y- dimension. For higher frequencies a finer resolution is needed, thus for the grid spacing is reduced according the following table:

Area scan grid spacing for different frequency ranges	
Frequency range	Grid spacing
≤ 2 GHz	≤ 15 mm
2 – 4 GHz	≤ 12 mm
4 – 6 GHz	≤ 10 mm

Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation. Results of this coarse scan are shown in annex B.

- A „zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous „coarse“ scan. It uses a fine meshed grid where the robot moves the probe in steps along all the 3 axis (x,y and z-axis) starting at the bottom of the Phantom. The grid spacing for the cube measurement is varied according to the measured frequency range, the dimensions are given in the following table:

Zoom scan grid spacing and volume for different frequency ranges			
Frequency range	Grid spacing for x, y axis	Grid spacing for z axis	Minimum zoom scan volume
≤ 2 GHz	≤ 8 mm	≤ 5 mm	≥ 30 mm
2 – 3 GHz	≤ 5 mm	≤ 5 mm	≥ 28 mm
3 – 4 GHz	≤ 5 mm	≤ 4 mm	≥ 28 mm
4 – 5 GHz	≤ 4 mm	≤ 3 mm	≥ 25 mm
5 – 6 GHz	≤ 4 mm	≤ 2 mm	≥ 22 mm

DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in annex B. Test results relevant for the specified standard (see section 3) are shown in table form in section 7.

Spatial Peak SAR Evaluation

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of all points in the three directions x, y and z. The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 1 to 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting 'Graph Evaluated'.
- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.
- All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computermathematik, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computermathematik, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

SAM 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. 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. 2.6)

Phantom Specification

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

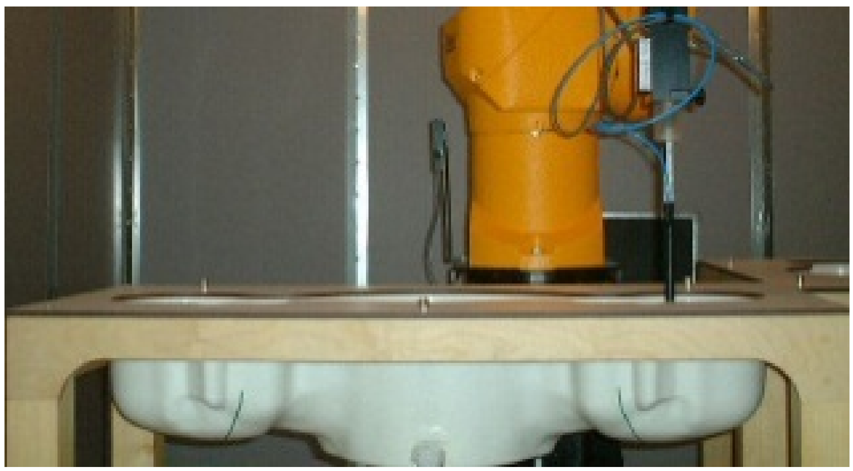


Figure 2.6 SAM Twin Phantom

Device Holder for Transmitters

In combination with the SAM Twin Phantom V4.0 the Mounting Device (see Fig. 2.7), 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 repeat ably be positioned according to the FCC, CENELEC, IEC and IEEE specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

Figure 2.7 Mounting Device

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. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

3. Definition of Reference Points

Ear Reference Point

Figure 3.2 shows the front, back and side views of the SAM 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 3.1. 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 3.1). 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].

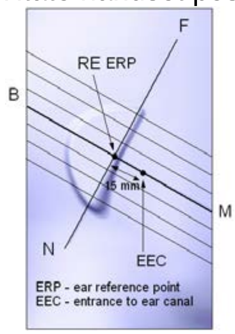


Figure 3.1 Close-up side view of ERP's

Figure 3.2 Front, back and side view of SAM

Device Reference Points

Two imaginary lines on the device need to be established: the vertical centerline and the horizontal line. The test device is 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. 3.3). The "test device reference point" is than located at the same level as the center of the ear reference point. The test device is positioned so that the "vertical centerline" is bisecting the front surface of the device at it's top and bottom edges, positioning the "ear reference point" on the outer surface of both the left and right head phantoms on the ear reference point [5].

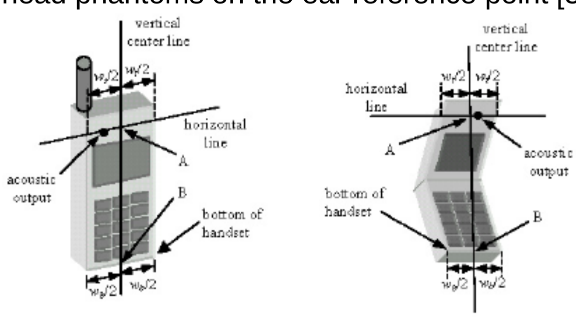


Figure 3.3 Handset Vertical Center & Horizontal Line Reference Points

4. Test Configuration Positions

Positioning for Cheek/Touch [5]

1. Position the device 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 4.1), such that the plane defined by the vertical center line and the horizontal line of the device is approximately parallel to the sagittal plane of the phantom.

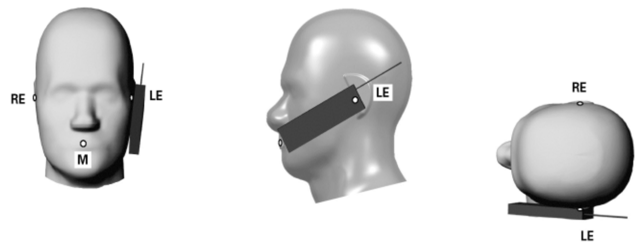


Figure 4.1 Front, Side and Top View of Cheek/Touch Position

2. Translate the device towards the phantom along the line passing through RE and LE until the device touches the ear.

3. While maintaining the device in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane).

4. Rotate the device around the vertical centerline until the device (horizontal line) is symmetrical with respect to the line NF.

5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE and maintaining the device contact with the ear, rotate the device about the line NF until any point on the device is in contact with a phantom point below the ear (cheek). See Figure 4.2.

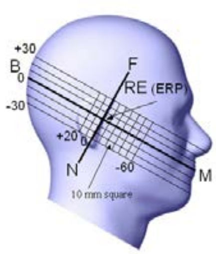


Figure 4.2 Side view w/ relevant markings

Positioning for Ear / 15˚ Tilt [5]

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

1. While maintaining the orientation of the device, retracted the device parallel to the reference plane far enough to enable a rotation of the device by 15 degrees.

2. Rotate the device around the horizontal line by 15 degrees.

3. While maintaining the orientation of the device, move the device parallel to the reference plane until any part of the device touches the head. (In this position, point A is located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact is at any location other than the pinna, the angle of the device shall be reduced. The tilted position is obtained when any part of the device is in contact with the ear as well as a second part of the device is in contact with the head (see Figure 4.3).

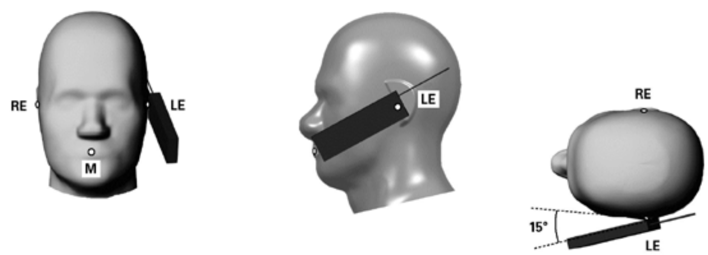


Figure 4.3 Front, Side and Top View of Ear/15˚ Tilt Position

Body Worn Configurations

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

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that 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, when 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.

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.

5. Probe and Dipole Calibration

See Appendix D and E.

6. Phantom & Simulating Tissue Specifications

Head & Body Simulating Mixture Characterization

The head and body mixtures consist of the material based on the table listed below. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. Body tissue parameters that have not been specified in IEEE1528-2013 are derived from the issue dielectric parameters computed from the 4-Cole-Cole equations.

Table 6.1 Typical Composition of Ingredients for Tissue

Ingredients		Simulating Tissue	
		1640 MHz Head	1640 MHz Body
Mixing Percentage			
Water		Proprietary Purchased from Speag	54.47
Sugar			0.00
Salt			0.33
HEC			0.00
Bactericide			0.00
DGBE			45.22
Dielectric Constant	Target	40.21	53.72
Conductivity (S/m)	Target	1.31	1.42

7. ANSI/IEEE C95.1 – 1999 RF Exposure Limits [2]

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 7.1 Human Exposure Limits

	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIROMENT Professional Population (W/kg) or (mW/g)
SPATIAL PEAK SAR[1] Brain	1.60	8.00
SPATIAL AVERAGE SAR[2] Whole Body	0.08	0.40
SPATIAL PEAK SAR[3] 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.

8. Measurement Uncertainty

Measurement uncertainty table is not required per KDB 865664 D01 v01r04 section 2.8.2 page 12. SAR measurement uncertainty analysis is required in the SAR report only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR. The equivalent ratio (1.5/1.6) should be applied to extremity and occupational exposure conditions. The highest reported value is less than 1.5 W/kg. Therefore, the measurement uncertainty table is not required.

9. System Validation

Tissue Verification

Table 9.1 Measured Tissue Parameters

		1640 MHz Head		1640 MHz Body	
Date(s)		Mar. 30, 2017		Mar. 31, 2017	
Liquid Temperature (˚C)	20.0	Target	Measured	Target	Measured
Dielectric Constant: ε		40.23	40.23	53.72	53.65
Conductivity: σ		1.30	1.33	1.42	1.43

See Appendix A for data printout.

Test System Verification

Prior to assessment, the system is verified to the ±10% of the specifications at the test frequency by using the system kit. Power is extrapolated to 1 watt. (Graphic Plots Attached)

Table 9.2 System Dipole Validation Target & Measured

	Test Frequency	Targeted SAR_{1g} (W/kg)	Measure SAR_{1g} (W/kg)	Tissue Used for Verification	Deviation Target and Fast SAR to SAR (%)	Plot Number
30-Mar-2017	1640 MHz	34.70	35.20	Head	+ 1.44	1
31-Mar-2017	1640 MHz	34.20	34.50	Body	+ 0.88	2

See Appendix A for data plots.

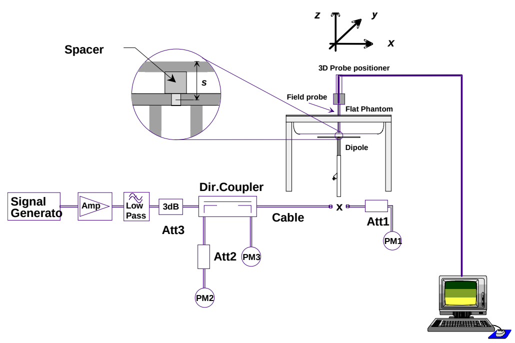


Figure 9.1 Dipole Validation Test Setup

10. SAR Test Data Summary

See Measurement Result Data Pages

See Appendix B for SAR Test Data Plots.
See Appendix C for SAR Test Setup Photos.

Procedures Used To Establish Test Signal

The device was placed into simulated transmit mode using the manufacturer's test codes. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR. When test modes are not available or inappropriate for testing a device, the actual transmission is activated through a base station simulator or similar equipment. See data pages for actual procedure used in measurement.

Device Test Condition

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 unless otherwise noted. If a conducted power deviation of more than 5% occurred, the test was repeated. The power drift of each test is measured at the start of the test and again at the end of the test. The drift percentage is calculated by the formula ((end/start)-1)*100 and rounded to three decimal places. The drift percentage is calculated into the resultant SAR value on the data sheet for each test.

The total frequency band of the device was 10 MHz. Per KDB 447498 D01 v06 section 4.1 6) on page 8, there is only one channel required to be tested.

$N_c = \text{Round}\ \{[100(f_{high} – f_{low})/f_c]^{0.5} \times (f_c/100)^{0.2}\} = \text{Round}\ \{[100(1626 – 1616)/1621]^{0.5} \times (1621/100)^{0.2} = 1$

The transmitter is controlled by the firmware to limit the duty cycle. The signal has a maximum duty cycle of 9.2%. All measurements were conducted with the transmitter at the duty cycle for the SAR tests as this was the maximum value achievable.

When the antenna was fully extended, the SAM phantom was limited on the ability to fully achieve a measurement of the hotspot of the antenna. Therefore, per KDB 648474 D04 v01r01, the device was tested with the flat Eli Phantom maintaining the same separation between the antenna and the phantom.

The device incorporates a PTT function. The device was testing with the device 25 mm from the flat phantom per KDB 643646 D01 v01r03.

1621 MHz			
Freq	**Channel**	**Antenna**	**Power**
1616	1	Retracted	32.71
1621	2		32.59
1626	3		32.51
1616	1	Extended	37.34
1621	2		37.21
1626	3		37.12

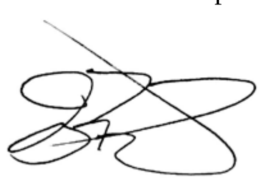
Conduct Power Measurements

SAR Data Summary – 1640 MHz Head

MEASUREMENT RESULTS									
Gap	Plot	Phantom	Position	Frequency		Modulation	End Power	Measured SAR (W/kg)	Reported SAR (W/kg)
				MHz	Ch		(dBm)		
0 mm	-----	Right Head	Retracted Touch	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.160	0.16
	1		Retracted Tilt	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.653	0.67
	-----		Extended Touch	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.0125	0.01
	-----		Extended Tilt	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.0375	0.04
	-----	Left Head	Retracted Touch	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.131	0.13
	-----		Retracted Tilt	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.353	0.36
	-----		Extended Touch	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.0123	0.01
	-----		Extended Tilt	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.0339	0.04
60 mm	-----	Flat Eli	Extended	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.128	0.14
25 mm	-----		Retracted PTT	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.0673	0.07
	-----		Extended PTT	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.121	0.14

Head
1.6 W/kg (mW/g)
averaged over 1 gram

1. Battery is fully charged for all tests.
   Power Measured ☒Conducted ☐ERP ☐EIRP
2. SAR Measurement
   Phantom Configuration ☒Left Head ☒Eli4 ☒Right Head
   SAR Configuration ☒Head ☐Body
3. Test Signal Call Mode ☒Test Code ☐Base Station Simulator
4. Test Configuration ☐With Belt Clip ☐Without Belt Clip ☒N/A
5. Tissue Depth is at least 15.0 cm



Jay M. Moulton
Vice President

SAR Data Summary – 1640 MHz Body

MEASUREMENT RESULTS

Gap	Plot	Phantom	Position	Frequency		Modulation	End Power	Measured SAR (W/kg)	Reported SAR (W/kg)
				MHz	Ch		(dBm)		
0 mm	-----	Flat Eli	Retracted	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	32.59	0.057	0.06
	2		Extended	1621	120	25ksps DE-QPSK with RRC Filtering (Alpha=0.4)	37.21	0.130	0.15

Body
1.6 W/kg (mW/g)
averaged over 1 gram

1. Battery is fully charged for all tests.
   Power Measured ☒Conducted ☐ERP ☐EIRP
2. SAR Measurement
   Phantom Configuration ☐Left Head ☒Eli4 ☐Right Head
   SAR Configuration ☐Head ☒Body
3. Test Signal Call Mode ☒Test Code ☐Base Station Simulator
4. Test Configuration ☒With Belt Clip ☐Without Belt Clip ☐N/A
5. Tissue Depth is at least 15.0 cm

Jay M. Moulton
Vice President

11. Test Equipment List

Table 11.1 Equipment Specifications

Type	Calibration Due Date	Calibration Done Date	Serial Number
Staubli Robot TX60L	N/A	N/A	F07/55M6A1/A/01
Measurement Controller CS8c	N/A	N/A	1012
SAM Twin Phantom	N/A	N/A	1416
ELI4 Flat Phantom	N/A	N/A	1065
Device Holder	N/A	N/A	N/A
Data Acquisition Electronics 4	04/15/2017	04/15/2016	1416
SPEAG E-Field Probe EX3DV4	02/15/2017	02/15/2017	3311
Speag Validation Dipole D1640V2	03/29/2018	03/29/2016	330
Agilent N1911A Power Meter	05/20/2019	03/20/2017	GB45100254
Agilent N1922A Power Sensor	06/25/2017	06/25/2015	MY45240464
Advantest R3261A Spectrum Analyzer	03/26/2019	03/20/2017	31720068
Agilent (HP) 8350B Signal Generator	03/26/2019	03/20/2017	2749A10226
Agilent (HP) 83525A RF Plug-In	03/26/2019	03/20/2017	2647A01172
Agilent (HP) 8753C Vector Network Analyzer	03/26/2019	03/20/2017	3135A01724
Agilent (HP) 85047A S-Parameter Test Set	03/26/2019	03/20/2017	2904A00595
Agilent (HP) 8960 Base Station Sim.	03/31/2017	03/31/2015	MY48360364
Anritsu MT8820C	07/28/2017	07/28/2015	6201176199
Agilent 778D Dual Directional Coupler	N/A	N/A	MY48220184
MiniCircuits BW-N20W5+ Fixed 20 dB Attenuator	N/A	N/A	N/A
MiniCircuits SPL-10.7+ Low Pass Filter	N/A	N/A	R8979513746
Aprel Dielectric Probe Assembly	N/A	N/A	0011
Head Equivalent Matter (1640 MHz)	N/A	N/A	N/A
Body Equivalent Matter (1640 MHz)	N/A	N/A	N/A

12. Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC/IC. 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 is a very complex phenomena that depends 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]

13. References

[1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radio Frequency Radiation, August 1996

[2] ANSI/IEEE C95.1 – 1992, American National Standard Safety Levels with respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300kHz to 100GHz, New York: IEEE, 1992.

[3] ANSI/IEEE C95.3 – 1992, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave, New York: IEEE, 1992.

[4] International Electrotechnical Commission, IEC 62209-2 (Edition 1.0), Human Exposure to radio frequency fields from hand-held and body mounted wireless communication devices – Human models, instrumentation, and procedures – Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz), March 2010.

[5] IEEE Standard 1528 – 2013, IEEE Recommended Practice for Determining the Peak-Spatial Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communication Devices: Measurement Techniques, June 2013.

[6] Industry Canada, RSS – 102 Issue 5 Draft, Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), March 2014.

[7] Health Canada, Safety Code 6, Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3kHz to 300 GHz, 2009.

Appendix A – System Validation Plots and Data

```
************************************************************
Test Result for UIM Dielectric Parameter
Thu 30/Mar/2017
Freq   Frequency(GHz)
FCC_eH FCC Limits for Head Epsilon
FCC_sH FCC Limits for Head Sigma
Test_e Epsilon  of  UIM
Test_s Sigma of UIM
************************************************************
Freq          FCC_eH FCC_sH Test_e Test_s
1.6100        40.29  1.28   40.28  1.30
1.6160        40.278 1.286  40.274 1.306*
1.6200        40.27  1.29   40.27  1.31
1.6210        40.268 1.29   40.267 1.311*
1.6260        40.258 1.29   40.252 1.316*
1.6300        40.25  1.29   40.24  1.32
1.6400        40.23  1.30   40.23  1.33
1.6500        40.21  1.31   40.22  1.34
1.6600        40.21  1.32   40.20  1.35
1.6700        40.22  1.33   40.18  1.36

* value interpolated
```

```
************************************************************
Test Result for UIM Dielectric Parameter
Fri 31/Mar/2017
Freq   Frequency(GHz)
FCC_eH Limits for Head Epsilon
FCC_sH Limits for Head Sigma
FCC_eB Limits for Body Epsilon
FCC_sB Limits for Body Sigma
Test_e Epsilon  of  UIM
Test_s Sigma of UIM
************************************************************
Freq          FCC_eB FCC_sB Test_e Test_s
1.6100        53.80  1.40   53.73  1.40
1.6160        53.782 1.406  53.712 1.406*
1.6200        53.77  1.41   53.70  1.41
1.6210        53.768 1.41   53.697 1.411*
1.6260        53.758 1.41   53.682 1.416*
1.6300        53.75  1.41   53.67  1.42
1.6400        53.72  1.42   53.65  1.43
1.6500        53.69  1.43   53.62  1.44
1.6600        53.67  1.43   53.60  1.45
1.6700        53.64  1.44   53.56  1.46

* value interpolated
```

RF Exposure Lab

Plot 1

DUT: Dipole 1640 MHz D1640V2; Type: D1640V2; Serial: 330

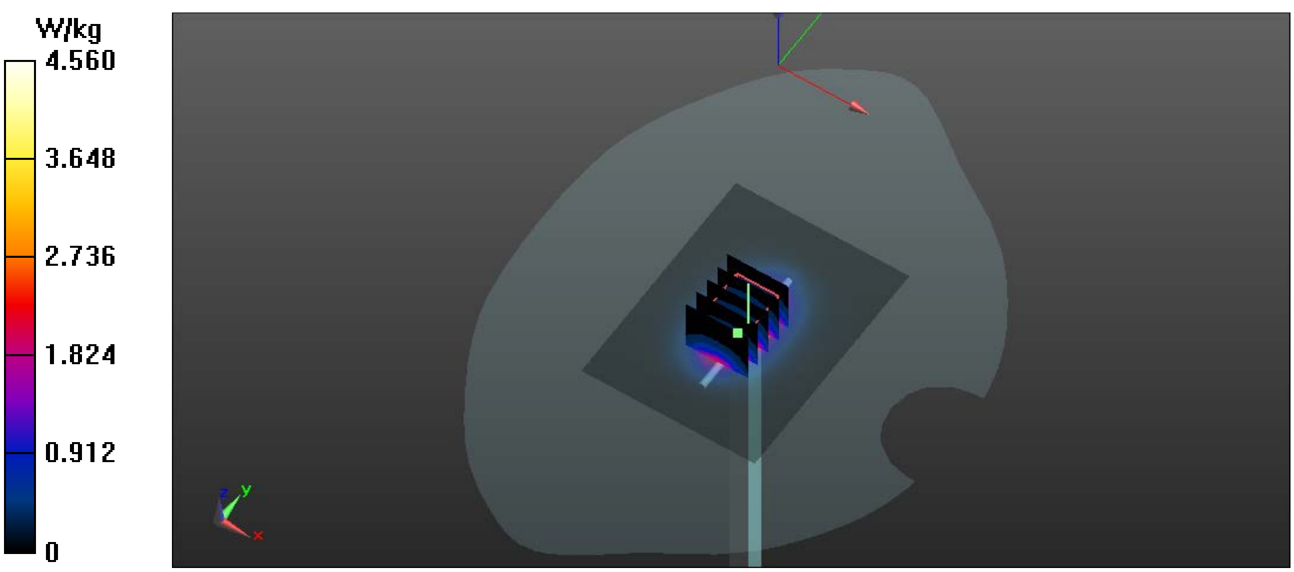
Communication System: CW; Frequency: 1640 MHz; Duty Cycle: 1:1
Medium: HSL1640; Medium parameters used: f = 1640 MHz; σ = 1.33 mho/m; ε_r = 40.23; ρ = 1000 kg/m^3
Phantom section: Flat Section

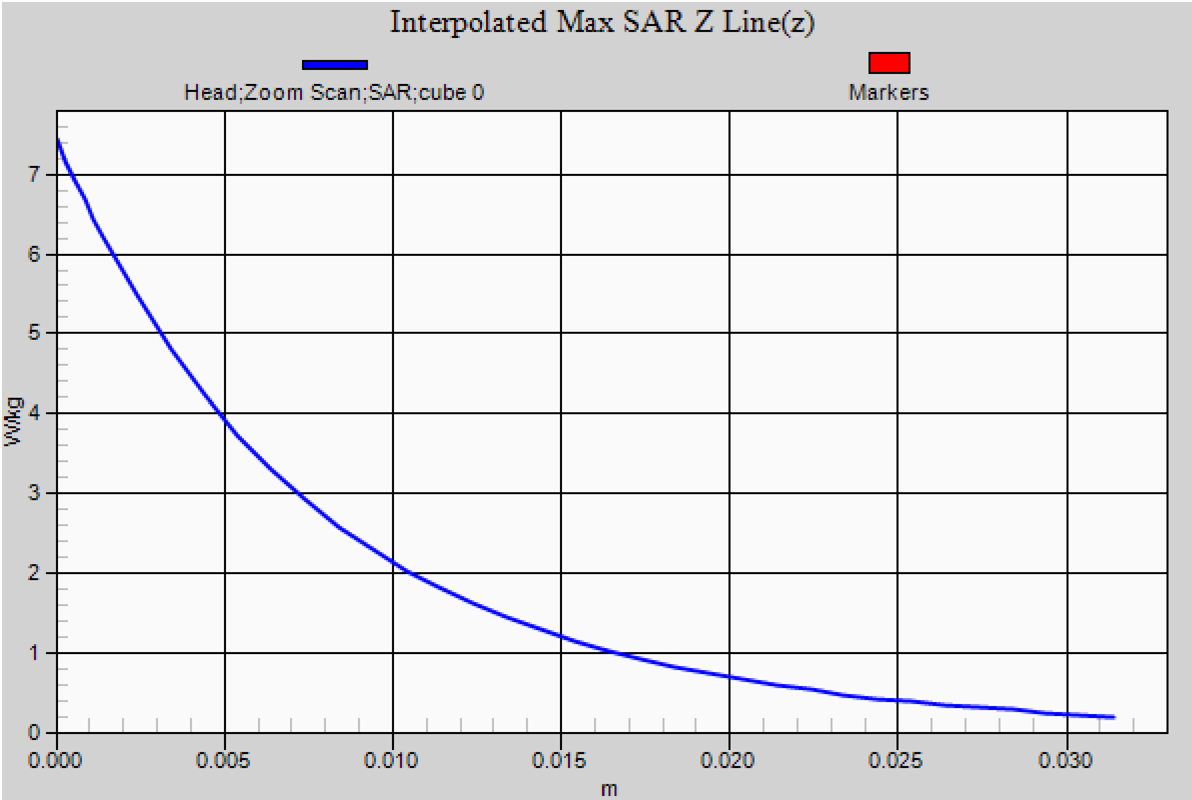
Test Date: Date: 3/30/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C
Probe: ES3DV3 - SN3311; ConvF(5.82, 5.82, 5.82); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: SAM with CRP; Type: SAM; Serial: 1416
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Procedure Notes:

1640 MHz Verification/Head/Area Scan (61x81x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm
Maximum value of SAR (interpolated) = 4.56 W/kg

1640 MHz Verification/Head/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 55.385 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 7.437 mW/g
P_{IN}=100mW
SAR(1 g) = 3.52 W/kg; SAR(10 g) = 1.9 W/kg
Maximum value of SAR (measured) = 6.14 W/kg




Interpolated Max SAR Z Line(z)
Head;Zoom Scan;SAR;cube 0
Markers
W/kg
0
1
2
3
4
5
6
7
0.000
0.005
0.010
0.015
0.020
0.025
0.030
m

RF Exposure Lab

Plot 2

DUT: Dipole 1640 MHz D1640V2; Type: D1640V2; Serial: 330

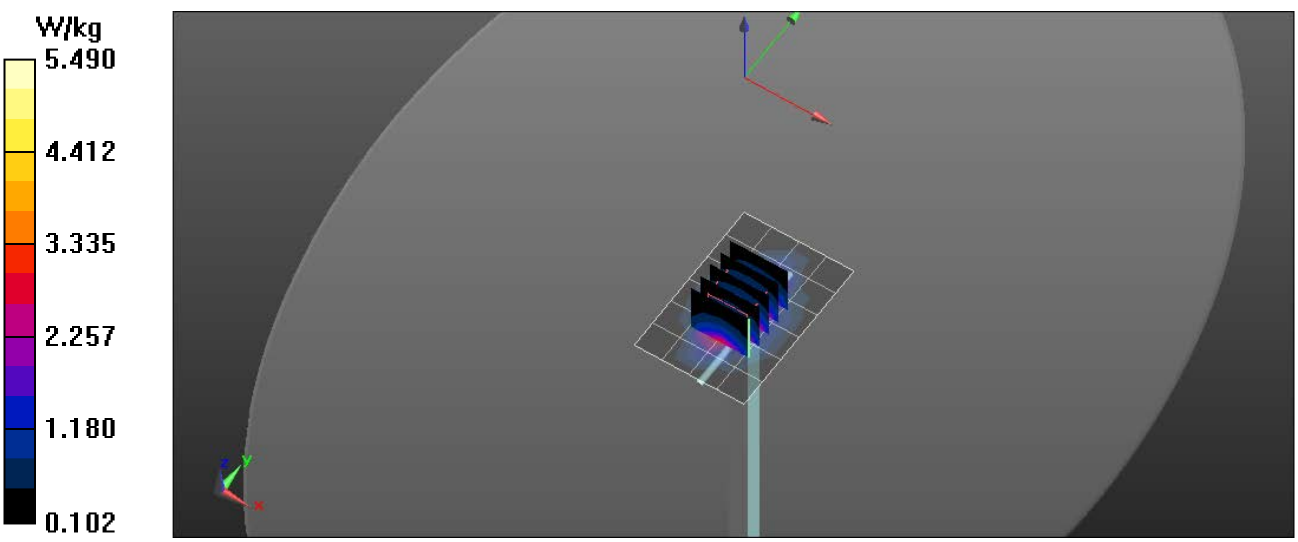
Communication System: CW; Frequency: 1640 MHz; Duty Cycle: 1:1
Medium: MSL1640; Medium parameters used: f = 1640 MHz; σ = 1.43 S/m; ε_r = 53.65; ρ = 1000 kg/m^3
Phantom section: Flat Section

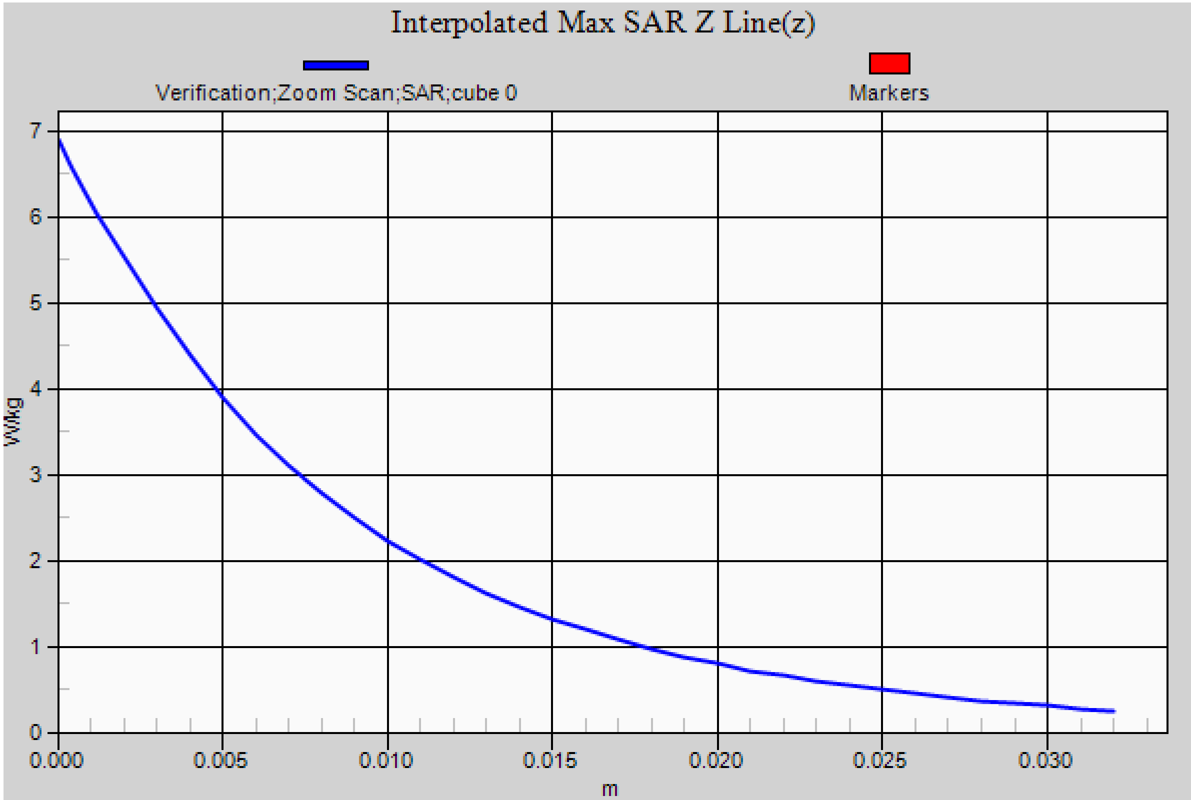
Test Date: Date: 3/31/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C
Probe: ES3DV3 - SN3311; ConvF(5.51, 5.51, 5.51); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Procedure Notes:

1640 MHz/Verification/Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 5.33 W/kg

1640 MHz/Verification/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 31.227 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 6.89 W/kg
P_{IN}=100mW
SAR(1 g) = 3.45 W/kg; SAR(10 g) = 1.89 W/kg
Maximum value of SAR (measured) = 5.49 W/kg




Interpolated Max SAR Z Line(z)
Verification;Zoom Scan;SAR;cube 0
Markers
W/kg
7
6
5
4
3
2
1
0
0.000
0.005
0.010
0.015
0.020
0.025
0.030
m

Appendix B – SAR Test Data Plots

RF Exposure Lab

Plot 1

DUT: 9575E; Type: Satellite Phone; Serial: FP2-01

Communication System: FDMA-FM; Frequency: 1621 MHz; Duty Cycle: 1:10.8693
Medium: HSL1640; Medium parameters used (interpolated): f = 1621 MHz; σ = 1.311 S/m; ε_r = 40.267; ρ = 1000 kg/m^3
Phantom section: Right Section

Test Date: Date: 3/30/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: ES3DV3 - SN3311; ConvF(5.82, 5.82, 5.82); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: SAM with CRP; Type: SAM; Serial: 1416
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

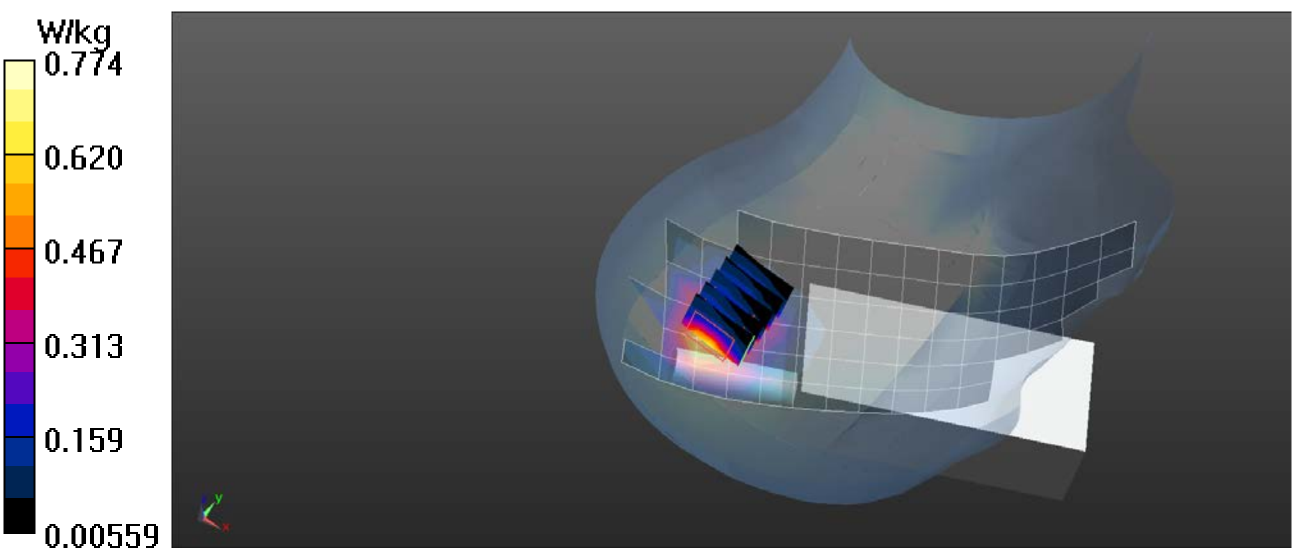
Procedure Notes:

9575E Right Head/Tilt Retracted Mid/Area Scan (7x16x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.884 W/kg

9575E Right Head/Tilt Retracted Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 5.635 V/m; Power Drift = -0.02 dB
Peak SAR (extrapolated) = 1.06 W/kg
SAR(1 g) = 0.653 W/kg; SAR(10 g) = 0.384 W/kg

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.774 W/kg



RF Exposure Lab

Plot 2

DUT: 9575E; Type: Satellite Phone; Serial: FP2-01

Communication System: FDMA-FM; Frequency: 1621 MHz; Duty Cycle: 1:10.8693
Medium: HSL1640; Medium parameters used (interpolated): f = 1621 MHz; σ = 1.311 S/m; ε_r = 40.267; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: Date: 3/31/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: ES3DV3 - SN3311; ConvF(5.82, 5.82, 5.82); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: SAM with CRP; Type: SAM; Serial: 1416
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

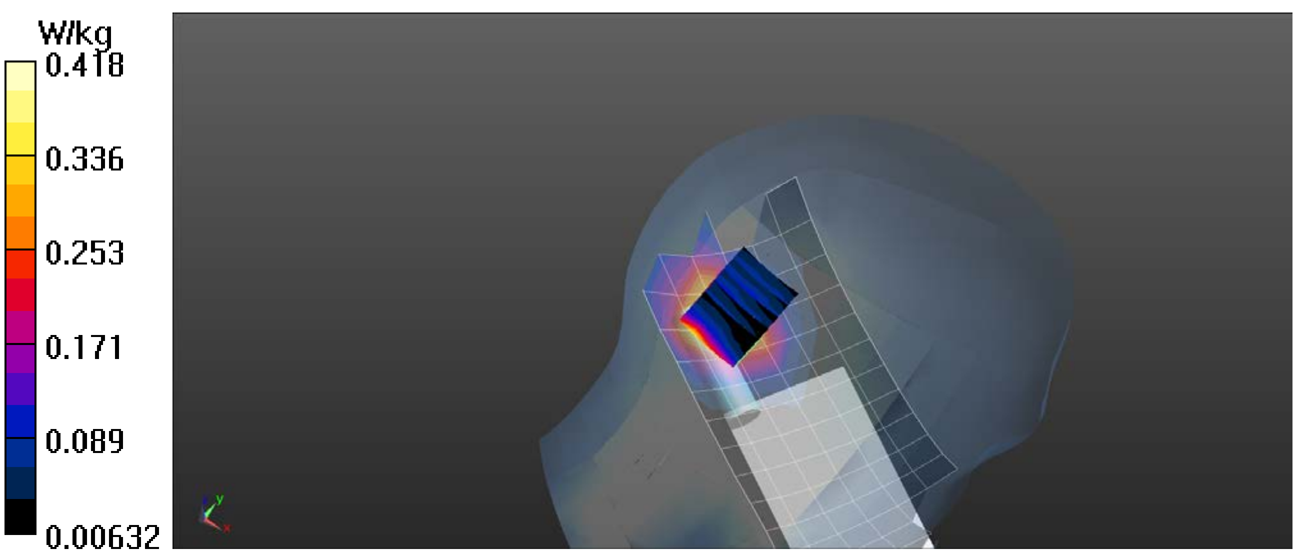
Procedure Notes:

9575E Left Head/Tilt Retracted Mid/Area Scan (7x16x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.473 W/kg

9575E Left Head/Tilt Retracted Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 5.152 V/m; Power Drift = -0.03 dB
Peak SAR (extrapolated) = 0.561 W/kg
SAR(1 g) = 0.353 W/kg; SAR(10 g) = 0.232 W/kg

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.418 W/kg



RF Exposure Lab

Plot 3

DUT: 9575E; Type: Satellite Phone; Serial: FP2-01

Communication System: FDMA-FM; Frequency: 1621 MHz; Duty Cycle: 1:10.8693
Medium: MSL1640; Medium parameters used (interpolated): f = 1621 MHz; σ = 1.411 S/m; ε_r = 53.697; ρ = 1000 kg/m^3
Phantom section: Flat Section

Test Date: Date: 3/31/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: ES3DV3 - SN3311; ConvF(5.51, 5.51, 5.51); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

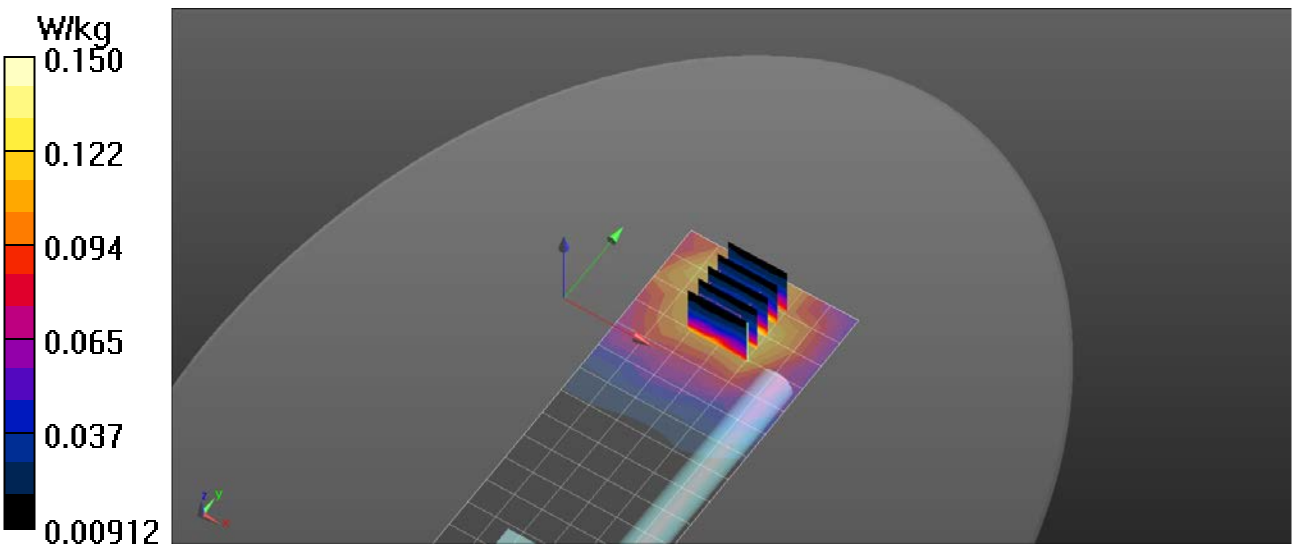
Procedure Notes:

9575E Body NA/Extended Mid/Area Scan (7x21x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.151 W/kg

9575E Body NA/Extended Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 0.8170 V/m; Power Drift = 0.02 dB
Peak SAR (extrapolated) = 0.233 W/kg
SAR(1 g) = 0.130 W/kg; SAR(10 g) = 0.086 W/kg

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.150 W/kg



RF Exposure Lab

Plot 4

DUT: 9575E; Type: Satellite Phone; Serial: FP2-01

Communication System: FDMA-FM; Frequency: 1621 MHz; Duty Cycle: 1:10.8693
Medium: HSL1640; Medium parameters used (interpolated): f = 1621 MHz; σ = 1.311 S/m; ε_r = 40.267; ρ = 1000 kg/m^3
Phantom section: Flat Section

Test Date: Date: 3/31/2017; Ambient Temp: 23 °C; Tissue Temp: 21 °C

Probe: ES3DV3 - SN3311; ConvF(5.82, 5.82, 5.82); Calibrated: 2/15/2017;
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1416; Calibrated: 4/15/2016
Phantom: ELI v4.0; Type: QDOVA001BB; Serial: 1065
Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

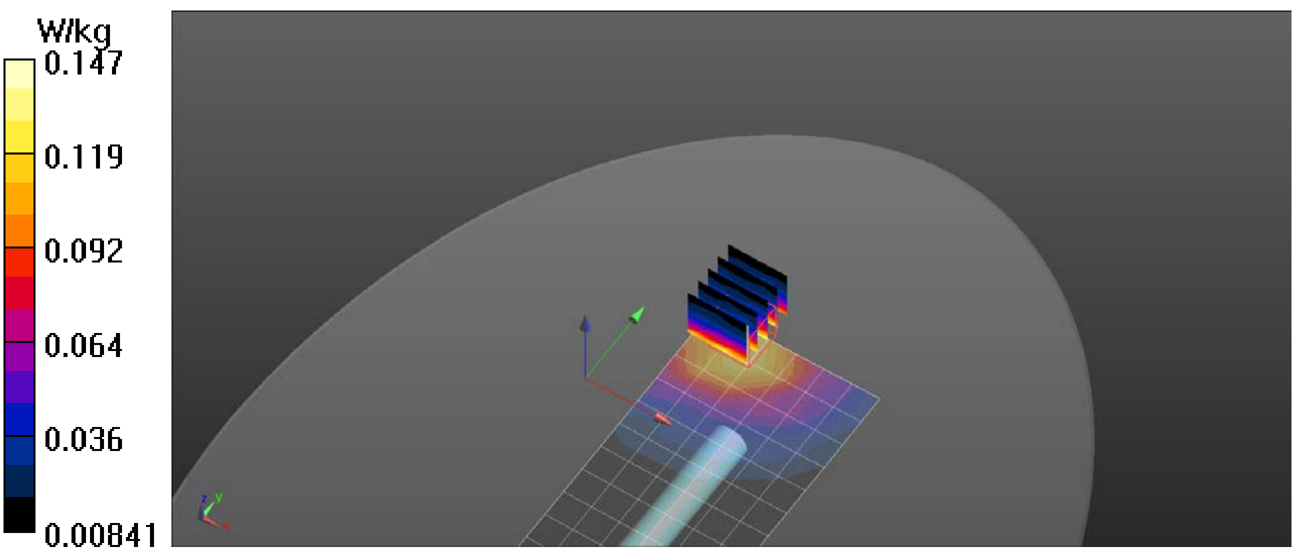
Procedure Notes:

9575E Face PTT/Extended Mid/Area Scan (7x21x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.143 W/kg

9575E Face PTT/Extended Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 1.605 V/m; Power Drift = -0.02 dB
Peak SAR (extrapolated) = 0.219 W/kg
SAR(1 g) = 0.121 W/kg; SAR(10 g) = 0.080 W/kg

Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.147 W/kg



Appendix C – SAR Test Setup Photos

Test Position Right Head Retracted Touch 0 mm Gap

Test Position Right Head Retracted Tilt 0 mm Gap

Test Position Right Head Extended Touch 0 mm Gap

Test Position Right Head Extended Tilt 0 mm Gap

Test Position Left Head Retracted Touch 0 mm Gap

Test Position Left Head Retracted Tilt 0 mm Gap

Test Position Left Head Extended Touch 0 mm Gap

Test Position Left Head Extended Tilt 0 mm Gap

Test Position Eli Flat Extended 60 mm Gap

Test Position PTT Face Retracted 25 mm Gap

Test Position PTT Face Extended 25 mm Gap

Test Position Body Retracted Touch 0 mm Gap

Test Position Body Extended Touch 0 mm Gap

Front of Device

Back of Device

Appendix D – Probe Calibration Data Sheets

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
S Servizio svizzero di taratura
Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Client **RF Exposure Lab**

Certificate No: ES3-3311_Feb17

CALIBRATION CERTIFICATE

Object: ES3DV3 - SN:3311

Calibration procedure(s): QA CAL-01.v9, QA CAL-12.v9, QA CAL-23.v5, QA CAL-25.v6
Calibration procedure for dosimetric E-field probes

Calibration date: February 15, 2017

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	06-Apr-16 (No. 217-02288/02289)	Apr-17
Power sensor NRP-Z91	SN: 103244	06-Apr-16 (No. 217-02288)	Apr-17
Power sensor NRP-Z91	SN: 103245	06-Apr-16 (No. 217-02289)	Apr-17
Reference 20 dB Attenuator	SN: S5277 (20x)	05-Apr-16 (No. 217-02293)	Apr-17
Reference Probe ES3DV2	SN: 3013	31-Dec-16 (No. ES3-3013_Dec16)	Dec-17
DAE4	SN: 660	7-Dec-16 (No. DAE4-660_Dec16)	Dec-17
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-16)	In house check: Jun-18
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-16)	In house check: Jun-18
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-16)	In house check: Jun-18
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-16)	In house check: Jun-18
Network Analyzer HP 8753E	SN: US37390585	18-Oct-01 (in house check Oct-16)	In house check: Oct-17

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

Issued: February 16, 2017

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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S **Servizio svizzero di taratura**
Swiss Calibration Service

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Accreditation No.: SCS 0108

Glossary:

TSL	tissue simulating liquid
NORMx,y,z	sensitivity in free space
ConvF	sensitivity in TSL / NORMx,y,z
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., ϑ = 0 is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

a) IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005
c) IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
d) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- *NORMx,y,z:* Assessed for E-field polarization ϑ = 0 (f ≤ 900 MHz in TEM-cell; f > 1800 MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not affect the E^2-field uncertainty inside TSL (see below *ConvF*).
- *NORM(f)x,y,z = NORMx,y,z * frequency_response* (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of *ConvF*.
- *DCPx,y,z:* DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- *PAR:* PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- *Ax,y,z; Bx,y,z; Cx,y,z; Dx,y,z; VRx,y,z*: *A, B, C, D* are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. *VR* is the maximum calibration range expressed in RMS voltage across the diode.
- *ConvF and Boundary Effect Parameters:* Assessed in flat phantom using E-field (or Temperature Transfer Standard for f ≤ 800 MHz) and inside waveguide using analytical field distributions based on power measurements for f > 800 MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to *NORMx,y,z* * *ConvF* whereby the uncertainty corresponds to that given for *ConvF*. A frequency dependent *ConvF* is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- *Spherical isotropy (3D deviation from isotropy)*: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- *Sensor Offset*: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- *Connector Angle*: The angle is assessed using the information gained by determining the *NORMx* (no uncertainty required).

Probe ES3DV3

SN:3311

Manufactured: July 5, 2011
Calibrated: February 15, 2017

Calibrated for DASY/EASY Systems
(Note: non-compatible with DASY2 system!)

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3311

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu V/(V/m)^2$)[A]	1.23	1.03	0.46	± 10.1 %
DCP (mV)[B]	102.8	101.4	99.9	

Modulation Calibration Parameters

UID	Communication System Name		A dB	B dB$\sqrt{\mu V}$	C	D dB	VR mV	Unc[E] (k=2)
0	CW	X	0.0	0.0	1.0	0.00	186.3	±3.3 %
		Y	0.0	0.0	1.0		183.6	
		Z	0.0	0.0	1.0		201.6	

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

[A] The uncertainties of Norm X,Y,Z do not affect the E^2-field uncertainty inside TSL (see Pages 5 and 6).
[B] Numerical linearization parameter: uncertainty not required.
[E] Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3311

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) [C]	Relative Permittivity [F]	Conductivity (S/m) [F]	ConvF X	ConvF Y	ConvF Z	Alpha [G]	Depth [G] (mm)	Unc (k=2)
150	52.3	0.76	7.66	7.66	7.66	0.07	1.30	± 13.3 %
220	49.0	0.81	7.70	7.70	7.70	0.08	1.30	± 13.3 %
300	45.3	0.87	7.61	7.61	7.61	0.12	1.60	± 13.3 %
450	43.5	0.87	7.22	7.22	7.22	0.18	1.90	± 13.3 %
600	42.7	0.88	6.79	6.79	6.79	0.13	1.60	± 13.3 %
1640	40.2	1.31	5.82	5.82	5.82	0.37	1.64	± 12.0 %
2450	39.2	1.80	4.88	4.88	4.88	0.71	1.28	± 12.0 %

[C] Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.
[F] At frequencies below 3 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.
[G] Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3311

Calibration Parameter Determined in Body Tissue Simulating Media

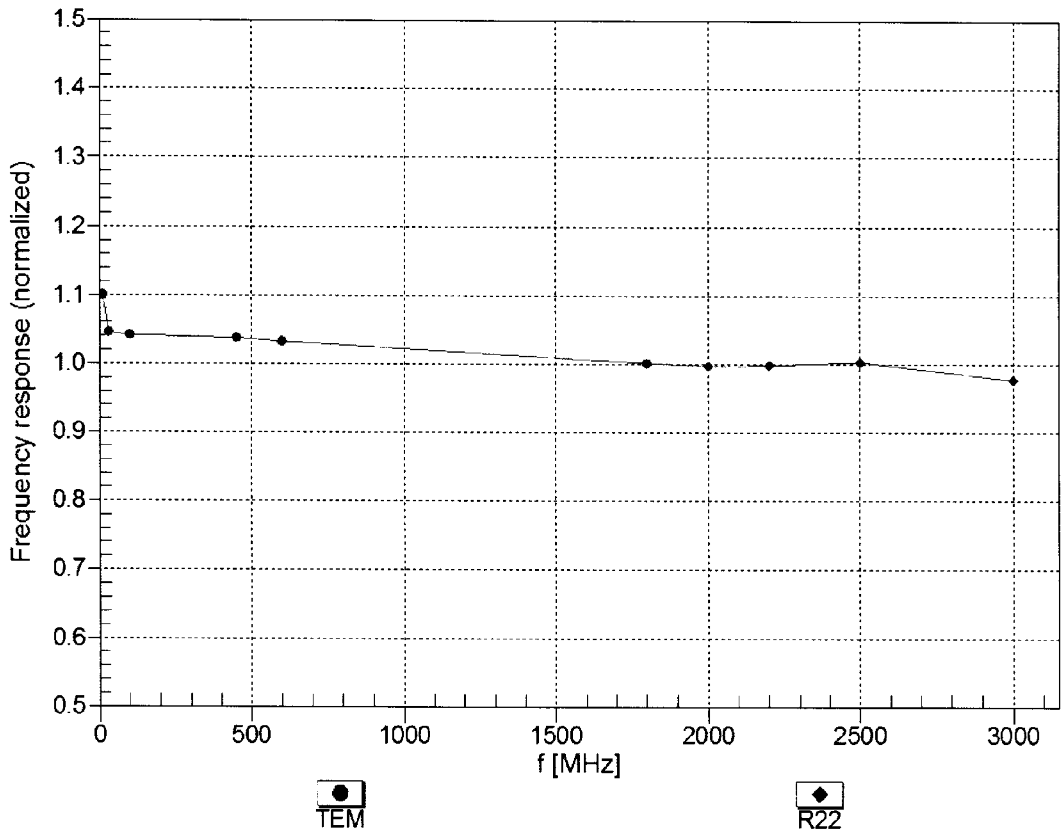
f (MHz) [C]	Relative Permittivity [F]	Conductivity (S/m) [F]	ConvF X	ConvF Y	ConvF Z	Alpha [G]	Depth [G] (mm)	Unc (k=2)
150	61.9	0.80	7.35	7.35	7.35	0.07	1.30	± 13.3 %
220	60.2	0.86	7.14	7.14	7.14	0.05	1.30	± 13.3 %
300	58.2	0.92	7.34	7.34	7.34	0.09	1.60	± 13.3 %
450	56.7	0.94	7.32	7.32	7.32	0.12	1.80	± 13.3 %
600	56.1	0.95	6.84	6.84	6.84	0.11	1.60	± 13.3 %
1640	53.7	1.42	5.51	5.51	5.51	0.54	1.47	± 12.0 %
2450	52.7	1.95	4.63	4.63	4.63	0.77	1.26	± 12.0 %

[C] Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

[F] At frequencies below 3 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

[G] Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

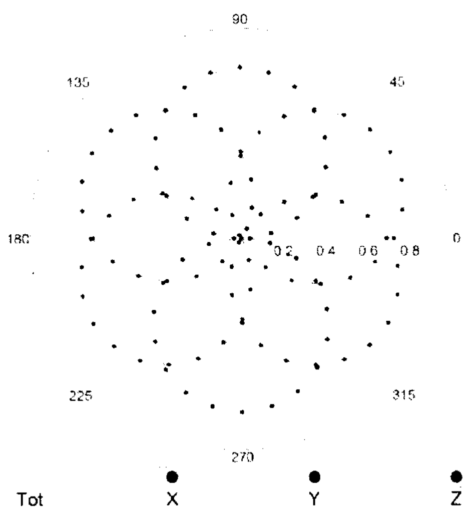
Frequency Response of E-Field
(TEM-Cell:ifi110 EXX, Waveguide: R22)



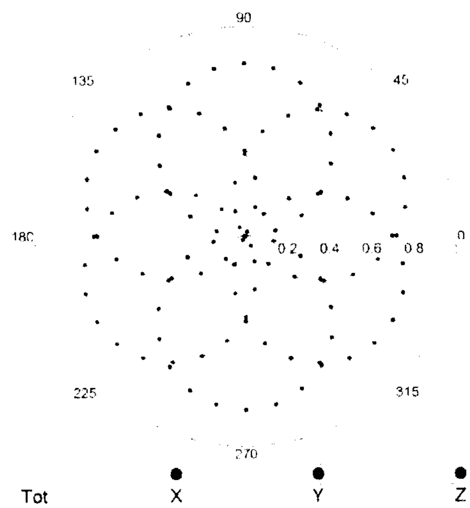
Uncertainty of Frequency Response of E-field: ± 6.3% (k=2)

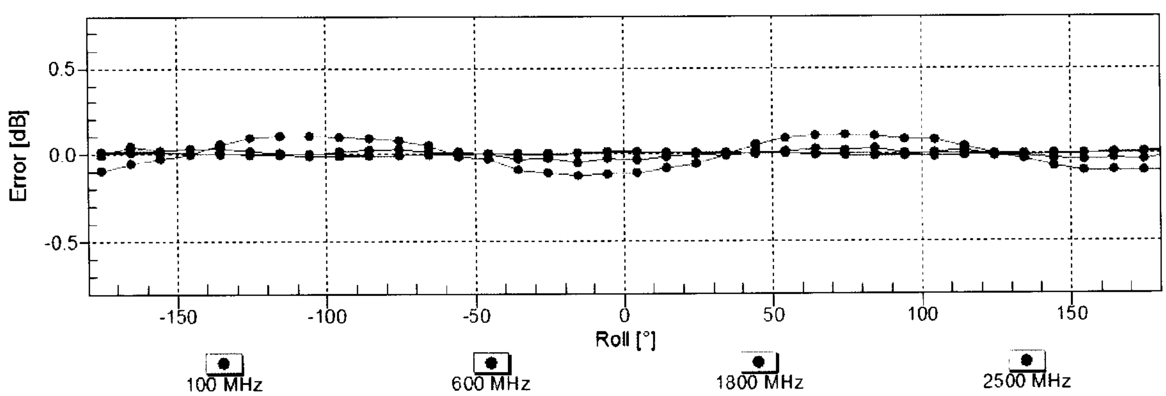
Receiving Pattern (ϕ), $\vartheta = 0°$

f=600 MHz,TEM



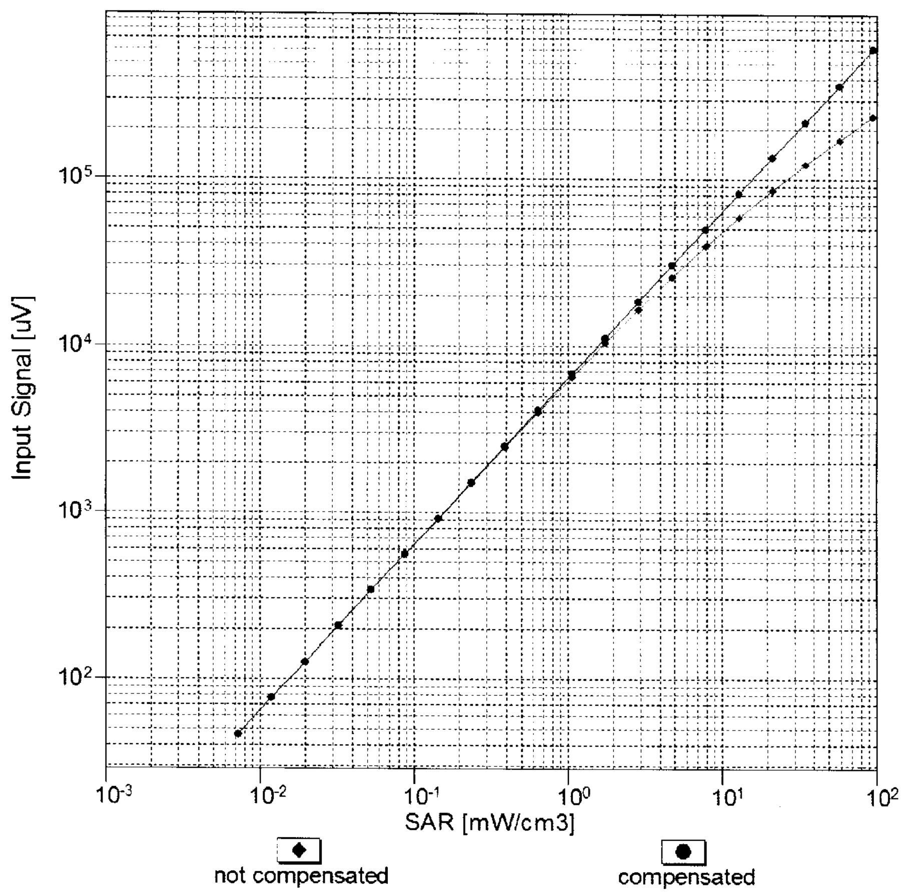
f=1800 MHz,R22

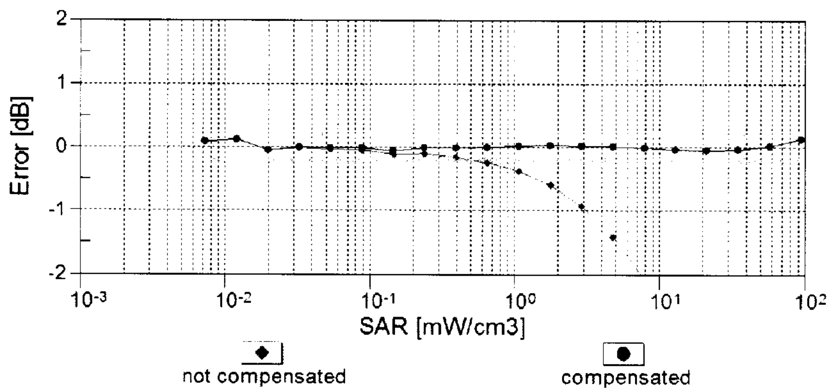




Uncertainty of Axial Isotropy Assessment: ± 0.5% (k=2)

Dynamic Range f(SAR_{head})
(TEM cell , f_{eval}= 1900 MHz)

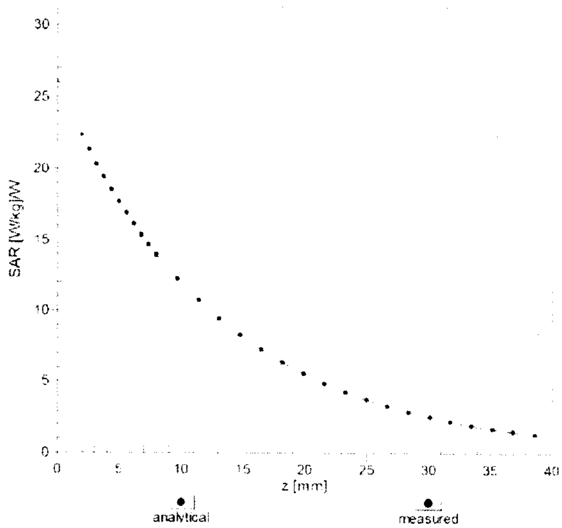




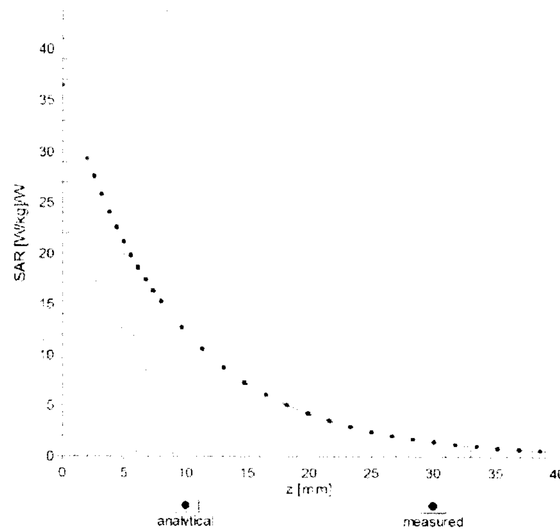
Uncertainty of Linearity Assessment: ± 0.6% (k=2)

Conversion Factor Assessment

f = 1640 MHz,WGLS R22 (H_convF)

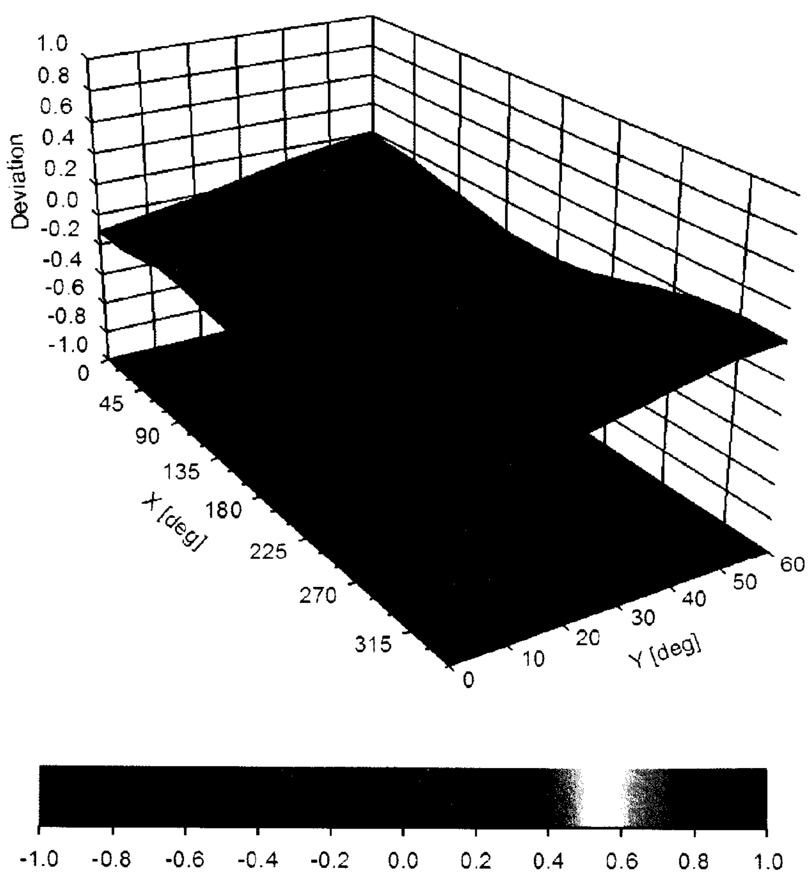


f = 2450 MHz,WGLS R22 (H_convF)



Deviation from Isotropy in Liquid

Error (ϕ, ϑ), f = 900 MHz



Uncertainty of Spherical Isotropy Assessment: ± 2.6% (k=2)

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3311

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	64.5
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	10 mm
Tip Diameter	4 mm
Probe Tip to Sensor X Calibration Point	2 mm
Probe Tip to Sensor Y Calibration Point	2 mm
Probe Tip to Sensor Z Calibration Point	2 mm
Recommended Measurement Distance from Surface	3 mm

Appendix E – Dipole Calibration Data Sheets

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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S Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Client **RF Exposure Lab**

Certificate No: D1640V2-330_Mar16

CALIBRATION CERTIFICATE

Object: D1640V2 - SN: 330

Calibration procedure(s): QA CAL-05.v9
Calibration procedure for dipole validation kits above 700 MHz

Calibration date: March 29, 2016

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter EPM-442A	GB37480704	07-Oct-15 (No. 217-02222)	Oct-16
Power sensor HP 8481A	US37292783	07-Oct-15 (No. 217-02222)	Oct-16
Power sensor HP 8481A	MY41092317	07-Oct-15 (No. 217-02223)	Oct-16
Reference 20 dB Attenuator	SN: 5058 (20k)	01-Apr-15 (No. 217-02131)	Mar-16
Type-N mismatch combination	SN: 5047.2 / 06327	01-Apr-15 (No. 217-02134)	Mar-16
Reference Probe EX3DV4	SN: 7349	31-Dec-15 (No. EX3-7349_Dec15)	Dec-16
DAE4	SN: 601	30-Dec-15 (No. DAE4-601_Dec15)	Dec-16

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
RF generator R&S SMT-06	100972	15-Jun-15 (in house check Jun-15)	In house check: Jun-18
Network Analyzer HP 8753E	US37390585 S4206	18-Oct-01 (in house check Oct-15)	In house check: Oct-16

	Name	Function	Signature
Calibrated by:	Jeton Kastrati	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: March 29, 2016

Glossary:

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

Calibration is Performed According to the Following Standards:

a) IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005
c) IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
d) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

e) DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

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

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

Measurement Conditions

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

DASY Version	DASY5	V52.8.8
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	1640 MHz ± 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	**Permittivity**	**Conductivity**
Nominal Head TSL parameters	22.0 °C	40.2	1.31 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	39.9 ± 6 %	1.30 mho/m ± 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm^3 (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	8.64 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**34.7 W/kg ± 17.0 % (k=2)**

SAR averaged over 10 cm^3 (10 g) of Head TSL	condition	
SAR measured	250 mW input power	4.67 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**18.7 W/kg ± 16.5 % (k=2)**

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	**Permittivity**	**Conductivity**
Nominal Body TSL parameters	22.0 °C	53.7	1.42 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	53.5 ± 6 %	1.42 mho/m ± 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm^3 (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	8.56 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	**34.2 W/kg ± 17.0 % (k=2)**

SAR averaged over 10 cm^3 (10 g) of Body TSL	condition	
SAR measured	250 mW input power	4.64 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	**18.6 W/kg ± 16.5 % (k=2)**

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	51.8 Ω + 3.3 jΩ
Return Loss	- 28.7 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	47.5 Ω + 1.8 jΩ
Return Loss	- 30.1 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.234 ns

After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.
No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
Manufactured on	November 29, 2010

Extended Calibration

Usage of SAR dipoles calibrated less than 3 years ago but more than 1 year ago were confirmed in maintaining return loss (< -20 dB, within 20% of prior calibration) and impedance (within 5 ohm from prior calibration) requirements per extended calibrations in KDB Publication 865664 D01 v01r04.

D1640V2 SN: 330 - Head

Date of Measurement	Return Loss (dB)	Δ%	Impedance (Ω)	ΔΩ	Impedance Imaginary (jΩ)	ΔΩ
3/29/2016	-28.7		51.8		3.3	
3/30/2017	-27.5	-4.2	50.3	-1.5	3.2	-0.1

D1640V2 SN: 330 - Body

Date of Measurement	Return Loss (dB)	Δ%	Impedance (Ω)	ΔΩ	Impedance Imaginary (jΩ)	ΔΩ
3/29/2016	-30.1		47.5		1.8	
3/30/2017	-30.7	2	46.3	-1.2	1.6	-0.2

DASY5 Validation Report for Head TSL

Date: 29.03.2016

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 1640 MHz; Type: D1640V2; Serial: D1640V2 - SN: 330

Communication System: UID 0 - CW; Frequency: 1640 MHz
Medium parameters used: f = 1640 MHz; σ = 1.3 S/m; ε_r = 39.9; ρ = 1000 kg/m^3
Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

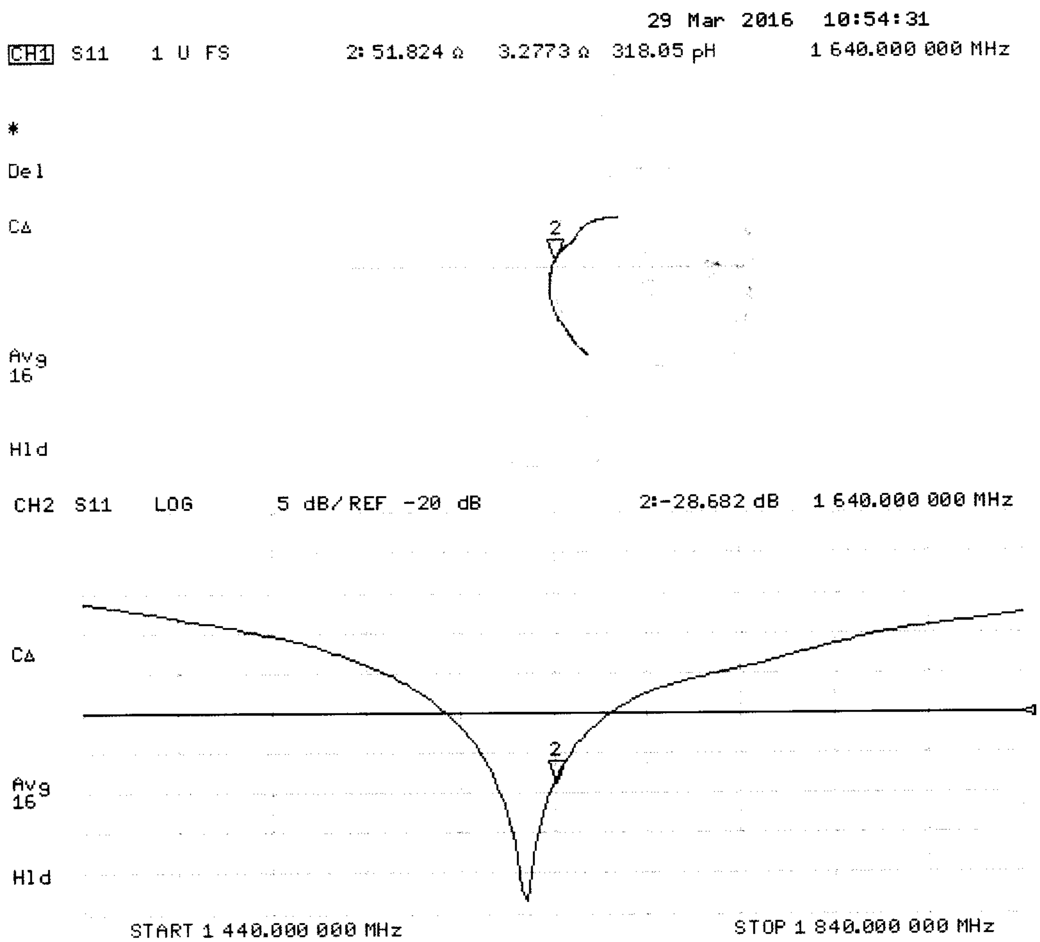
- Probe: EX3DV4 - SN7349; ConvF(8.58, 8.58, 8.58); Calibrated: 31.12.2015;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 30.12.2015
- Phantom Type: QD000P50AA
- DASY52 52.8.8(1258); SEMCAD X 14.6.10(7372)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 103.8 V/m; Power Drift = 0.04 dB
Peak SAR (extrapolated) = 15.7 W/kg
SAR(1 g) = 8.64 W/kg; SAR(10 g) = 4.67 W/kg
Maximum value of SAR (measured) = 13.0 W/kg

0 dB = 13.0 W/kg = 11.14 dBW/kg

Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 29.03.2016

Test Laboratory: SPEAG, Zurich, Switzerland

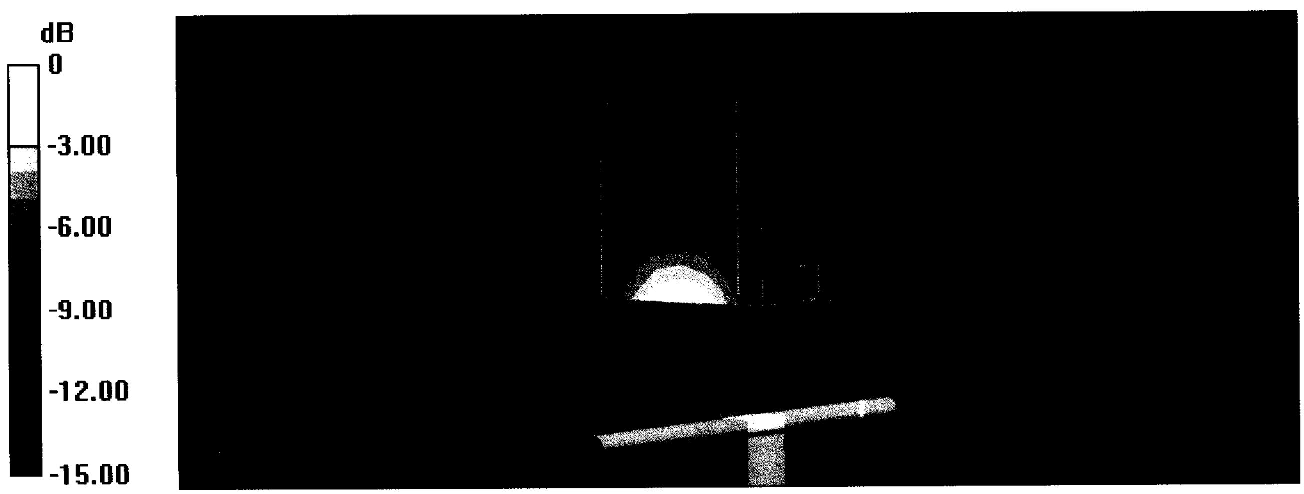
DUT: Dipole 1640 MHz; Type: D1640V2; Serial: D1640V2 - SN: 330

Communication System: UID 0 - CW; Frequency: 1640 MHz
Medium parameters used: f = 1640 MHz; σ = 1.42 S/m; ε_r = 53.5; ρ = 1000 kg/m^3
Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

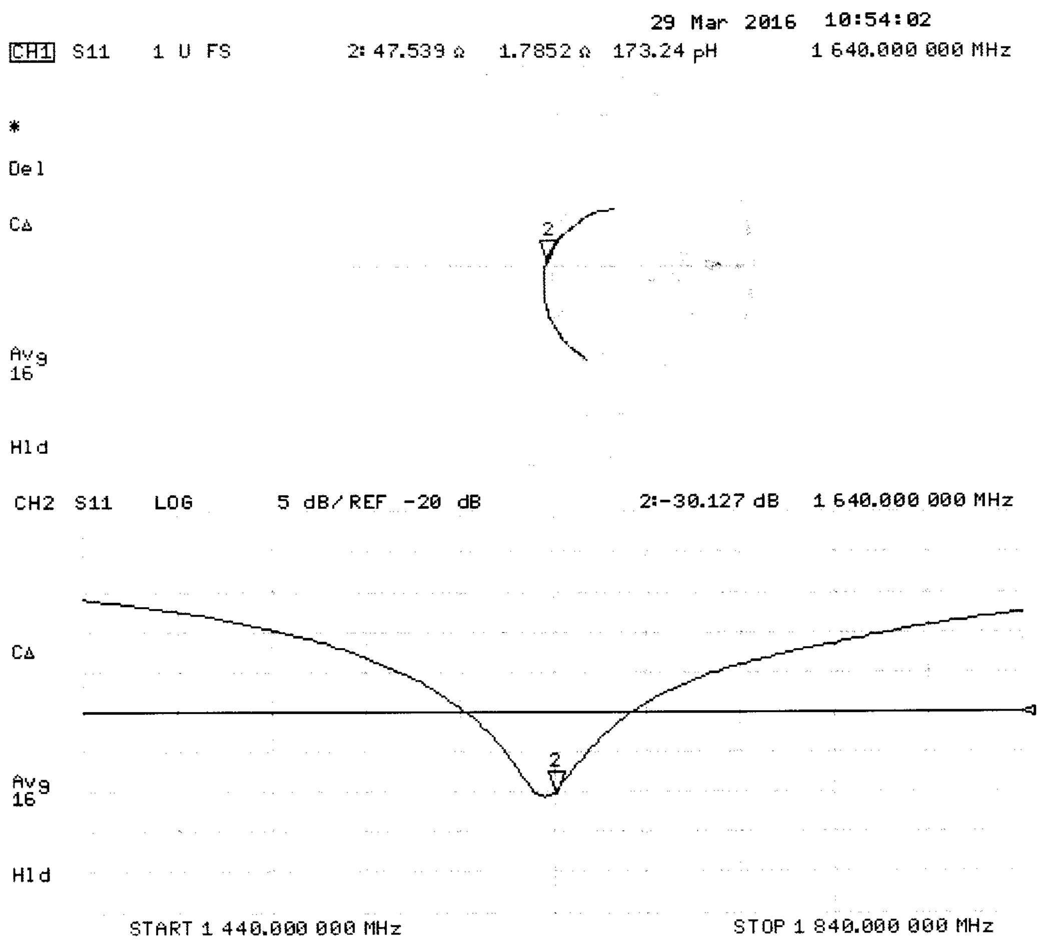
- Probe: EX3DV4 - SN7349; ConvF(8.67, 8.67, 8.67); Calibrated: 31.12.2015;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 30.12.2015
- Phantom Type: QD000P50AA
- DASY52 52.8.8(1258); SEMCAD X 14.6.10(7372)

Dipole Calibration for Body Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:
Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 98.72 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 15.2 W/kg
SAR(1 g) = 8.56 W/kg; SAR(10 g) = 4.64 W/kg
Maximum value of SAR (measured) = 12.9 W/kg



0 dB = 12.9 W/kg = 11.11 dBW/kg

Impedance Measurement Plot for Body TSL



Appendix F – Phantom Calibration Data Sheets

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Certificate of Conformity / First Article Inspection

Item	SAM Twin Phantom V4.0
Type No	QD 000 P40 C
Series No	TP-1150 and higher
Manufacturer	SPEAG Zeughausstrasse 43 CH-8004 Zürich Switzerland

Tests
The series production process used allows the limitation to test of first articles.
Complete tests were made on the pre-series Type No. QD 000 P40 AA, Serial No. TP-1001 and on the series first article Type No. QD 000 P40 BA, Serial No. TP-1006. Certain parameters have been retested using further series items (called samples) or are tested at each item.

Test	Requirement	Details	Units tested
Dimensions	Compliant with the geometry according to the CAD model.	IT'IS CAD File (*)	First article, Samples
Material thickness of shell	Compliant with the requirements according to the standards	2mm +/- 0.2mm in flat and specific areas of head section	First article, Samples, TP-1314 ff.
Material thickness at ERP	Compliant with the requirements according to the standards	6mm +/- 0.2mm at ERP	First article, All items
Material parameters	Dielectric parameters for required frequencies	300 MHz – 6 GHz: Relative permittivity < 5, Loss tangent < 0.05	Material samples
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards if handled and cleaned according to the instructions. Observe technical Note for material compatibility.	DEGMBE based simulating liquids	Pre-series, First article, Material samples
Sagging	Compliant with the requirements according to the standards. Sagging of the flat section when filled with tissue simulating liquid.	< 1% typical < 0.8% if filled with 155mm of HSL900 and without DUT below	Prototypes, Sample testing

Standards
[1] CENELEC EN 50361
[2] IEEE Std 1528-2003
[3] IEC 62209 Part I
[4] FCC OET Bulletin 65, Supplement C, Edition 01-01
(*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of the other documents.

Conformity
Based on the sample tests above, we certify that this item is in compliance with the uncertainty requirements of SAR measurements specified in standards [1] to [4].

Date 07.07.2005

Signature / Stamp

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Certificate of Conformity / First Article Inspection

Item	Oval Flat Phantom ELI 4.0
Type No	QD OVA 001 B
Series No	1003 and higher
Manufacturer	Untersee Composites Knebelstrasse 8 CH-8268 Mannenbach, Switzerland

Tests
Complete tests were made on the prototype units QD OVA 001 AA 1001, QD OVA 001 AB 1002, pre-series units QD OVA 001 BA 1003-1005 as well as on the series units QD OVA 001 BB, 1006 ff.

Test	Requirement	Details	Units tested
Material thickness	Compliant with the standard requirements	Bottom plate: 2.0mm +/- 0.2mm	all
Material parameters	Dielectric parameters for required frequencies	< 6 GHz: Rel. permittivity = 4 +/-1, Loss tangent ≤ 0.05	Material sample
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards if handled and cleaned according to the instructions.	DGBE based simulating liquids. Observe Technical Note for material compatibility.	Equivalent phantoms, Material sample
Shape	Thickness of bottom material, Internal dimensions, Sagging compatible with standards from minimum frequency	Bottom elliptical 600 x 400 mm Depth 190 mm, Shape is within tolerance for filling height up to 155 mm, Eventual sagging is reduced or eliminated by support via DUT	Prototypes, Sample testing

Standards
[1] CENELEC EN 50361-2001, « Basic standard for the measurement of the Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz – 3 GHz) », July 2001
[2] IEEE 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques, December 2003
[3] IEC 62209 – 1, "Specific Absorption Rate (SAR) in the frequency range of 300 MHz to 3 GHz – Measurement Procedure, Part 1: Hand-held mobile wireless communication devices", February 2005
[4] IEC 62209 – 2, Draft, "Human Exposure to Radio Frequency Fields from Handheld and Body-Mounted Wireless Communication Devices – Human models, Instrumentation and Procedures – Part 2: Procedure to determine the Specific Absorption Rate (SAR) in the head and body for 30 MHz to 6 GHz Handheld and Body-Mounted Devices used in close proximity to the Body.", February 2005
[5] OET Bulletin 65, Supplement C, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", Edition January 2001

Based on the tests above, we certify that this item is in compliance with the standards [1] to [5] if operated according to the specific requirements and considering the thickness. The dimensions are fully compliant with [4] from 30 MHz to 6 GHz. For the other standards, the minimum lower frequency limit is limited due to the dimensional requirements ([1]: 450 MHz, [2]: 300 MHz, [3]: 800 MHz, [5]: 375 MHz) and possibly further by the dimensions of the DUT.

Date 28.4.2008 **Signature / Stamp**

s p e a g
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Appendix G – Validation Summary

Per FCC KDB 865664 D02 v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue equivalent media for system validation according to the procedures outlined in FCC KDB 865664 D01 v01r04 and IEEE 1528-2013. Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point using the system that normally operates with the probe for routine SAR measurements and according to the required tissue equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table G-1
SAR System Validation Summary

SAR System #	Freq. (MHz)	Date	Probe S/N	Probe Type	Probe Cal. Point		Cond. (σ)	Perm. (ε_r)	CW Validation			Modulation Valildation		
									Sens-itivity	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
2	1640	3/30/2017	3311	ES3DV3	1640	Head	1.33	40.23	Pass	Pass	Pass	BPSK	Pass	Pass
2	1640	3/31/2017	3311	ES3DV3	1640	Body	1.43	53.65	Pass	Pass	Pass	BPSK	Pass	Pass