FCC OET BULLETIN 65 SUPPLEMENT C
CLASS II PERMISSIVE CHANGE
IC RSS-102 ISSUE 3

SAR EVALUATION REPORT

(Additional SAR evaluation due to enhanced energy coupling at increased separation distances)

FOR
Broadcom 802.11g WLAN PCI-E Mini Card
(Tested inside of HP Notebook PC, HSTNN-I71C)

MODEL: BCM94312HMG
FCC ID: QDS-BRCM1030
IC: 4324A-BRCM1030

REPORT NUMBER: 09U12862-4A
ISSUE DATE: November 13, 2009

Prepared for

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Prepared by

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NVLAP LAB CODE 200065-0

Revision History

Rev.	Issue Date	Revisions	Revised By
--	October 27, 2009	Initial Issue	--
A	November 13, 2009	Updated some typos in this report	Sunny Shih

TABLE OF CONTENTS

1. ATTESTATION OF TEST RESULTS

COMPANY NAME:	BROADCOM CORPORATION 190 MATHILDA PLACE SUNNYVALE, CA 94086
EUT DESCRIPTION:	Broadcom 802.11g WLAN PCI-E Mini Card (Tested inside of HP Notebook PC, HSTNN-I71C)
MODEL NUMBER:	BCM94312HMG
DEVICE CATEGORY:	Portable
EXPOSURE CATEGORY:	General Population/Uncontrolled Exposure
DATE TESTED:	October 23, 2009

APPLICABLE STANDARDS:

STANDARD	TEST RESULTS
FCC OET BULLETIN 65 SUPPLEMENT C and the following KDB procedures: • KDB 248227 SAR measurement procedures for 802.11a/b/g transmitters • KDB 447498 Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies	Pass
RSS-102 ISSUE 3	Pass

Compliance Certification Services, Inc. (CCS) tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by CCS based on interpretations and/or observations of test results. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by CCS and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by CCS will constitute fraud and shall nullify the document. No part of this report may be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any government agency.

Approved & Released For CCS By:

SUNNY SHIH
ENGINEERING SUPERVISOR
COMPLIANCE CERTIFICATION SERVICES

Tested By:

CHAO YEN LIN
EMC ENGINEER
COMPLIANCE CERTIFICATION SERVICES

2. TEST METHODOLOGY

The tests documented in this report were performed in accordance with FCC OET Bulletin 65 Supplement C, Specific FCC Procedure KDB 248227 SAR Measurement Procedure for 802.11abg Transmitters, KDB 447498 Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies and IC RSS 102 Issue 3.

3. FACILITIES AND ACCREDITATION

The test sites and measurement facilities used to collect data are located at 47173 Benicia Street, Fremont, California, USA.

CCS is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at http://www.ccsemc.com.

4. CALIBRATION AND UNCERTAINTY

4.1. MEASURING INSTRUMENT CALIBRATION

The measuring equipment utilized to perform the tests documented in this report has been calibrated in accordance with the manufacturer's recommendations, and is traceable to recognized national standards.

Name of Equipment	Manufacturer	Type/Model	Serial Number	Cal. Due date		
				MM	DD	Year
Robot - Six Axes	Stäubli	RX90BL	N/A	N/A		
Robot Remote Control	Stäubli	CS7MB	3403-91535	N/A		
DASY4 Measurement Server	SPEAG	SEUMS001BA	1041	N/A		
Probe Alignment Unit	SPEAG	LB (V2)	261	N/A		
SAM Phantom (SAM1)	SPEAG	QD000P40CA	1185	N/A		
SAM Phantom (SAM2)	SPEAG	QD000P40CA	1050	N/A		
Oval Flat Phantom (ELI 4.0)	SPEAG	QD OVA001 B	1003	N/A		
Electronic Probe kit	HP	85070C	N/A	N/A		
S-Parameter Network Analyzer	Agilent	8753ES-6	MY40001647	11	14	2009
Signal Generator	Agilent	8753ES-6	MY40001647	11	14	2009
E-Field Probe	SPEAG	EX3DV4	3686	3	23	2010
Thermometer	ERTCO	639-1S	1718	5	1	2010
Data Acquisition Electronics	SPEAG	DAE3 V1	500	9	15	2010
System Validation Dipole	SPEAG	D2450V2	748	4	14	2010
System Validation Dipole	SPEAG	D5GHzV2	1003	11	21	2009
ESG Vector Signal Generator	Agilent	E4438C	US44271090	9	17	2010
Power Meter	Giga-tronics	8651A	8651404	1	11	2010
Power Sensor	Giga-tronics	80701A	1834588	1	11	2010
Amplifier	Mini-Circuits	ZVE-8G	90606	N/A		
Amplifier	Mini-Circuits	ZHL-42W	D072701-5	N/A		
Simulating Liquid	CCS	M2450	N/A	Within 24 hrs of first tes		

4.2. MEASUREMENT UNCERTAINTY

Measurement uncertainty for 300 MHz – 3000 MHz

Uncertainty component	Tol. (±%)	Probe Dist.	Div.	Ci (1g)	Ci (10g)	Std. Unc.(±%)	
						Ui (1g)	Ui(10g)
Measurement System							
Probe Calibration	4.80	N	1	1	1	4.80	4.80
Axial Isotropy	4.70	R	1.732	0.707	0.707	1.92	1.92
Hemispherical Isotropy	9.60	R	1.732	0.707	0.707	3.92	3.92
Boundary Effects	1.00	R	1.732	1	1	0.58	0.58
Linearity	4.70	R	1.732	1	1	2.71	2.71
System Detection Limits	1.00	R	1.732	1	1	0.58	0.58
Readout Electronics	1.00	N	1	1	1	1.00	1.00
Response Time	0.80	R	1.732	1	1	0.46	0.46
Integration Time	2.60	R	1.732	1	1	1.50	1.50
RF Ambient Conditions - Noise	1.59	R	1.732	1	1	0.92	0.92
RF Ambient Conditions - Reflections	0.00	R	1.732	1	1	0.00	0.00
Probe Positioner Mechnical Tolerance	0.40	R	1.732	1	1	0.23	0.23
Probe Positioning With Respect to Phantom Shell	2.90	R	1.732	1	1	1.67	1.67
algorithms for max. SAR evaluation	3.90	R	1.732	1	1	2.25	2.25
Test sample Related							
Test Sample Positioning	1.10	N	1	1	1	1.10	1.10
Device Holder Uncertainty	3.60	N	1	1	1	3.60	3.60
Power and SAR Drift Measurement	5.00	R	1.732	1	1	2.89	2.89
Phantom and Tissue Parameters							
Phantom Uncertainty	4.00	R	1.732	1	1	2.31	2.31
Liquid Conductivity - Target	5.00	R	1.732	0.64	0.43	1.85	1.24
Liquid Conductivity - Meas.	8.60	N	1	0.64	0.43	5.50	3.70
Liquid Permittivity - Target	5.00	R	1.732	0.6	0.49	1.73	1.41
Liquid Permittivity - Meas.	3.30	N	1	0.6	0.49	1.98	1.62
Combined Standard Uncertainty	RSS					11.44	10.49
Expanded Uncertainty (95% Confidence Interval)	K=2					22.87	20.98

Notesfor table
1. Tol. - tolerance in influence quaitity
2. N - Nomal
3. R - Rectangular
4. Div. - Divisor used to obtain standard uncertainty
5. Ci - is te sensitivity coefficient

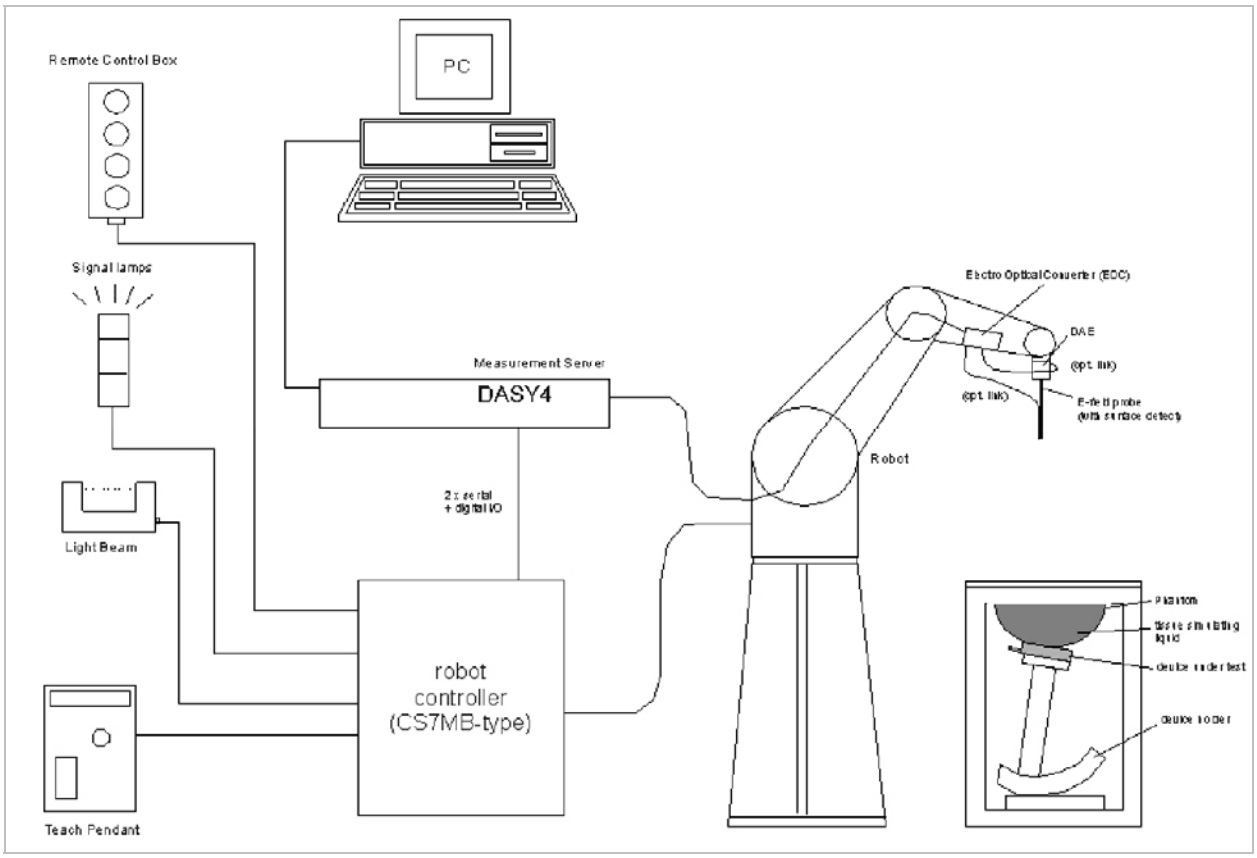
5. EQUIPMENT UNDER TEST

Broadcom 802.11g WLAN PCI-E Mini Card

(Tested inside of HP Notebook PC, HSTNN-I71C)

Normal operation:	Lap-held only	
	Note: SAR test with display open at 90° to the keyboard	
Antenna tested:	Manufactured	Model Number
	Yageo	6036B0055102 (Main)
		6036B0054802 (Aux)
Power supply:	Power supplied through laptop computer (host device)	

6. SYSTEM SPECIFICATIONS



The DASY4 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stäubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 2000 or Windows XP.
- DASY4 software.
- Remote controls with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validate the proper functioning of the system.

7. COMPOSITION OF INGREDIENTS FOR TISSUE SIMULATING LIQUIDS

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (S/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

Salt: 99+% Pure Sodium Chloride Sugar: 98+% Pure Sucrose

Water: De-ionized, 16 MΩ+ resistivity HEC: Hydroxyethyl Cellulose

DGBE: 99+% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1, 3, 3-tetramethylbutyl)phenyl]ether

8. LIQUID PARAMETERS CHECK

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectric parameters are within the tolerances of the specified target values. The relative permittivity and conductivity of the tissue material should be within ± 5% of the values given in the table below.

Reference Values of Tissue Dielectric Parameters for Head and Body Phantom (for 150 – 3000 MHz and 5800 MHz)

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in IEEE Standard 1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations and extrapolated according to the head parameters specified in IEEE Standard 1528.

Target Frequency (MHz)	Head		Body	
	ε_r	σ (S/m)	ε_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	**55.0**	**1.05**
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	**53.3**	**1.52**
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

(ε_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m^3)

Simulating Liquid Dielectric Parameters for Muscle 2450 MHz

Room Ambient Temperature = 24°C; Relative humidity = 40% Measured by: Chaoyen Lin

f (MHz)	Liquid Parameters			Measured	Target	Delta (%)	Limit (%)
2450	e'	53.19	Relative Permittivity (ε_r):	53.192	52.7	0.93	± 5
	e"	14.30	Conductivity (σ):	1.949	1.95	-0.06	± 5

Liquid Temperature: 23 deg. C
October 23, 2009 8:12 AM

Frequency	e'	e"
2400000000	53.2885	14.0507
2405000000	53.2764	14.1241
2410000000	53.2618	14.1893
2415000000	53.2582	14.2328
2420000000	53.2443	14.259
2425000000	53.2397	14.2772
2430000000	53.2454	14.2705
2435000000	53.2296	14.2766
2440000000	53.2252	14.2911
2445000000	53.1962	14.3188
2450000000	**53.1923**	**14.2979**
2455000000	53.1233	14.2745
2460000000	53.0872	14.2464
2465000000	53.0234	14.2092
2470000000	53.008	14.1616
2475000000	52.9929	14.1374
2480000000	53.0007	14.1445
2485000000	52.9939	14.1636
2490000000	52.9963	14.2209
2495000000	52.9982	14.2947
2500000000	52.9933	14.3976

The conductivity (σ) can be given as:

$$\sigma = \omega \varepsilon_0 e'' = 2 \pi f \varepsilon_0 e''$$

where f = target f * 10^6

ε_0 = 8.854 * 10^{-12}

9. SYSTEM PERFORMANCE

The system performance check is performed prior to any usage of the system in order to guarantee reproducible results. The system performance check verifies that the system operates within its specifications of ±10%.

System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the SAM twin phantom filled with Body simulating liquid of the following parameters.
- The DASY4 system with an Isotropic E-Field Probe EX3DV4-SN: 3686 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
  For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (2.4 GHz) fine cube was chosen for cube integration and Special 8x8x10 (5 GHz) fine cube was chosen for cube integration
- Distance between probe sensors and phantom surface was set to 4 mm.
  For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5mm
- The dipole input power (forward power) was 250 mW±3%.
- The results are normalized to 1 W input power.

450 to 2450 MHz Reference SAR Values for body-tissue

In the table below, the numerical reference SAR values of a SPEAG validation dipoles placed below the flat phantom filled with body-tissue simulating liquid are given. The reference SAR values were calculated using the finite-difference time-domain method and the geometry parameters.

Dipole Type	Distance (mm)	Frequency (MHz)	SAR (1g) [W/kg]	SAR (10g) [W/kg]	SAR (peak) [W/kg]
D450V2	15	450	5.01	3.36	7.22
D835V2	15	835	9.71	6.38	14.1
D900V2	15	900	**11.1**	**7.17**	16.3
D1450V2	10	1450	29.6	16.6	49.8
D1800V2	10	1800	**38.5**	**20.3**	67.5
D1900V2	10	1900	39.8	20.8	69.6
D2000V2	10	2000	**40.9**	**21.2**	71.5
D2450V2	10	2450	51.2	23.7	97.6

Note: All SAR values normalized to 1 W forward power.

9.1. SYSTEM PERFORMANCE CHECK RESULTS

System Validation Dipole: D2450V2 SN: 748

Date: October 23, 2009

Ambient Temperature = 24°C; Relative humidity = 40% Measured by: Chaoyen Lin

Medium	CW Signal (MHz)	Forward power (mW)	Measured (Normalized to 1 W)		Target	Delta (%)	Tolerance (%)
Body	2450	250	1g SAR:	53.7	51.2	4.88	±10
			10g SAR:	24.6	23.7	3.80	

10. OUTPUT POWER VERIFICATION

The following procedures had been used to prepare the EUT for the SAR test.
The client provided a special driver and program, wl_tools, which enable a user to control the frequency and output power of the module.

RF Conducted Output Power Measurement Results:

Please refer to Broadcom's Operational Description document for Average Power information (confidential exhibit) as documented in 11/30/2007 original filing.

Before SAR evaluation, CCS has verified the RF conducted average power at 2437 MHz which is in a agreement with previous reported average output power.

11. Enhanced Energy Coupling (KDB 447498)

The highest 1-g SAR value as documented in 07/20/2009 Class II permissive change filing is 0.183 W/kg @ 2437 MHz / Main Antenna location with 16 cm antenna-to-user separation distance.

According to KDB 447498, the test configuration with the highest 1-g SAR must be used to determine if additional SAR evaluation is required due to enhanced energy coupling at increased separation distances.

From the test results below, additional 1g SAR evaluation is not required.

2.4GHz	Antenna-to-person distance (cm)	Peak SAR (mW/g)	E-field (V/m)	Lower than Initial (%)
Initial	16.0	0.027	2.19	
1	16.5	0.020752862	1.92	76.9%
2	17.0	0.012666542	1.5	46.9%

12. SAR TEST PLOTS

SAR PLOT for Main Antenna

Date/Time: 10/23/2009 10:30:19 AM

Test Laboratory: Compliance Certification Services

Lapheld Position

DUT: HP; Type: NA; Serial: NA

Communication System: 802.11bg; Frequency: 2437 MHz;Duty Cycle: 1:1
Medium parameters used (interpolated): f = 2437 MHz; σ = 1.94 mho/m; ε_r = 53.2; ρ = 1000 kg/m^3
Phantom section: Flat Section

Room Ambient Temperature: 22.0 deg. C; Liquid Temperature: 21.0 deg. C

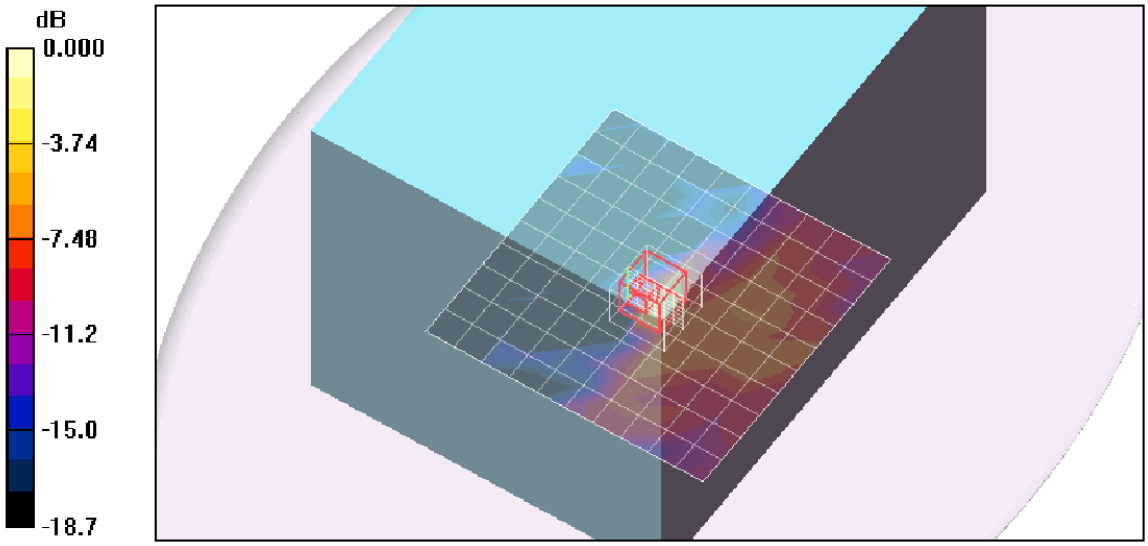
DASY4 Configuration:
- Area Scan setting - Find Secondary Maximum Within: 2.0 dB and with a peak SAR value greater than 0.0012W/kg
- Probe: EX3DV4 - SN3686; ConvF(6.48, 6.48, 6.48); Calibrated: 3/23/2009
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn500; Calibrated: DAE not calibrated
- Phantom: Flat Phantom ELI4.0; Type: QDOVA001BA; Serial: SN:XXXX
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

802.11b M-ch Main Antenna/Area Scan (11x11x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.008 mW/g

802.11b M-ch Main Antenna/Zoom Scan (7x7x9)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=3mm
Reference Value = 2.01 V/m; Power Drift = 0.056 dB
Peak SAR (extrapolated) = 0.047 W/kg
SAR(1 g) = 0.00671 mW/g; SAR(10 g) = 0.00306 mW/g

Maximum value of SAR (measured) = 0.027 mW/g



0 dB = 0.027mW/g

13. ATTACHMENTS

No.	Contents	No. of page (s)
1	System Validation Plots	2
2	Certificate of E-Field Probe - EX3DV4 SN 3686	10
3	Certificate of System Validation Dipole D2450V2	6