



# SAR Test Report

No.: SAR\_BROAD\_062\_08002\_BRCM1031

for

**Broadcom Corporation**

**FCC ID: QDS-BRCM1031**

**IC No.: 4324A-BRCM1031**

**Model Number: PP12S**

**Date of Report: 12/05/2008**  
**Date of issue: 12/05/2008**  
**Report Copy No.: 01**



**FCC listed#**  
**A2LA certified**  
**IC recognized #**  
**3462B**

## **CETECOM Inc.**

411 Dixon Landing Road ♦ Milpitas, CA 95035 ♦ U.S.A.

Phone: + 1 (408) 586 6200 ♦ Fax: + 1 (408) 586 6299 ♦ E-mail: [info@cetecomusa.com](mailto:info@cetecomusa.com) ♦ <http://www.cetecom.com>

CETECOM Inc. is a Delaware Corporation with Corporation number: 2113686

Board of Directors: Dr. Harald Ansorge, Dr. Klaus Matkey, Hans Peter May

## Contents

<b>1. ASSESSMENT .....</b>	<b>4</b>
<b>2. ADMINISTRATIVE DATA.....</b>	<b>5</b>
2.1. Identification of the Testing Laboratory Issuing the SAR Assessment Report .....	5
2.2. Identification of the Client.....	5
2.3. Identification of the Manufacturer.....	5
<b>3. EQUIPMENT UNDER INVESTIGATION (EUI).....</b>	<b>6</b>
3.1. Identification of the Equipment under Investigation .....	6
<b>4. SUBJECT OF INVESTIGATION .....</b>	<b>7</b>
4.1. The IEEE Standard C95.1 and the FCC Exposure Criteria .....	7
4.2. Distinction Between Exposed Population, Duration of Exposure and Frequencies...	8
4.3. Distinction between Maximum Permissible Exposure and SAR Limits.....	8
4.4. SAR Limit.....	9
<b>5. THE FCC MEASUREMENT PROCEDURE .....</b>	<b>10</b>
5.1. General Requirements.....	10
5.2. Test Positions .....	10
5.3. Body-worn and Other Configurations.....	10
5.4. Procedure for assessing the peak spatial-average SAR .....	11
5.5. Determination of the largest peak spatial-average SAR .....	13
<b>6. THE MEASUREMENT SYSTEM .....</b>	<b>14</b>
6.1. Robot system specification .....	14
6.2. Probe and amplifier specification .....	15
6.3. Phantoms.....	15
6.4. SAR measurement procedure .....	16
6.5. SARA2 Interpolation and Extrapolation schemes .....	16

6.6. Interpolation of 2D area scan.....	17
6.7. Extrapolation of 3D scan.....	17
6.8. Interpolation of 3D scan and volume averaging.....	17
<b>7. UNCERTAINTY ASSESSMENT.....</b>	<b>19</b>
7.1. Measurement Uncertainty Budget .....	20
<b>8. TEST RESULTS SUMMARY.....</b>	<b>21</b>
8.1. Conducted Output Power.....	21
8.2. Test Positions and Configurations .....	21
8.3. 2400 MHz band SAR Results for PP12S with Yageo antenna .....	21
8.4. 5200 MHz band SAR Results for PP12S with Yageo antenna .....	22
8.5. 5600 MHz band SAR Results for PP12S with Yageo antenna .....	22
8.6. 5800 MHz band SAR Results for PP12S with Yageo antenna .....	23
8.7. 2400 MHz band SAR Results for PP12S with Amphenol antenna .....	23
8.8. 5200 MHz band SAR Results for PP12S with Amphenol antenna .....	24
8.9. 5600 MHz band SAR Results for PP12S with Amphenol antenna .....	24
8.10. 5800 MHz band SAR Results for PP12S with Amphenol antenna .....	25
8.11. Dipole Validation Check Results.....	25
8.12. Waveguide Validation Check Results.....	26
<b>9. REFERENCES.....</b>	<b>28</b>

## 1. Assessment

The Dell PP12S is in compliance with the limits for general population uncontrolled exposure specified in FCC 2.1093. The device was tested according to measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C (Edition 01-01) and IEEE P1528/D1.2, April 21, 2003.

Technical responsibility for area of testing:

<b>12/05/2008</b>	<b>EMC &amp; Radio</b>	<b>Lothar Schmidt</b> <b>(Director Regulatory &amp; Antenna Services)</b>	
<b>Date</b>	<b>Section</b>	<b>Name</b>	<b>Signature</b>

This report is prepared by:

<b>12/05/2008</b>	<b>EMC &amp; Radio</b>	<b>Marc Douat</b> <b>(SAR Engineer)</b>	
<b>Date</b>	<b>Section</b>	<b>Name</b>	<b>Signature</b>

## 2. Administrative Data

### 2.1. Identification of the Testing Laboratory Issuing the SAR Assessment Report

Company Name:	CETECOM Inc.
Department:	SAR
Address:	411 Dixon Landing Road Milpitas, CA 95035 U.S.A.
Telephone:	+1 (408) 586 6200
Fax:	+1 (408) 586 6299
Responsible Test Lab Manager:	Lothar Schmidt

### 2.2. Identification of the Client

Applicant's Name:	Broadcom Corporation
Address:	190 Mathilda Place Sunnyvale, 94086, USA
Contact Person:	Dan Lawless
Phone No.	408 922 5870
Fax:	408 543 3399
e-mail:	dlawless@broadcom.com

### 2.3. Identification of the Manufacturer

Manufactured by client shown above.
-------------------------------------

### 3. Equipment under Investigation (EUI)

#### 3.1. Identification of the Equipment under Investigation

Marketing Name:	PP12S
Model No:	PP12S
Host PC:	Dell PP12S
FCC-ID:	QDS-BRCM1031
Frequency Range:	2400-2483.5MHz, 5150-5250MHz, 5250-5350MHz, 5470-5725MHz, 5725-5850MHz
Type(s) of Modulation:	CCK, OFDM
Antennas	Amphenol IFA Antenna
	Peak Gain 2400-2483.5MHz: 2.38dBi.
	Peak Gain 5725-5850MHz: 1.64dBi.
	Yageo IFA Antenna
	Peak Gain 2400-2483.5MHz: 0.64dBi.
	Peak Gain 5725-5850MHz: 1.63dBi
Output Power:	Consistent with original filing

#### 4. Subject of Investigation

The objective of the measurements done by Cetecom Inc. was the dosimetric assessment of one device. The tests were performed in configurations for devices operated next to a person's body. The examinations were carried out with the dosimetric assessment system SARA2 described in Section 6.

There are two sets of antennae being implemented in the host platform with this module. They are differentiated by having the additional "bump" on top of the LCD screen.

There are two antenna manufacturers for each set of antennae, Yageo and Amphenol. Please reference the table below for a complete depiction of the antennae gains at different bands and in different modes of operation.

No	Antenna Manufacturer	Max Peak gain (2.4GHz)	Max Peak gain (5GHz)	Configuration
1	Amphenol	TX2 (-0.44) dBi(H)	TX2 1.644dBi(H)	Bump out TA mode
2	Amphenol	TX2 (-1.089)dBi(H)	TX2 (-0.083)dBi(H)	No Bump TA mode
3	Yageo	Main 0.39dBi(H)	Aux 1.52dBi(V)	Bump out TA mode
4	Yageo	Main (-0.85)dBi(V)	Aux 0.67dBi(V)	No Bump TA mode
5	Amphenol	Main 2.38dBi(H)	Main 1.37dBi(V)	Bump out PC mode
6	Amphenol	Main 2.38dBi(H)	Main 1.37dBi(V)	No Bump PC mode
7	Yageo	Main 0.64dBi(V)	Main (-0.27)dBi(V)	Bump out PC mode
8	Yageo	Main (-0.40)dBi(V)	Main 1.63dBi(V)	No Bump PC mode

##### 4.1. The IEEE Standard C95.1 and the FCC Exposure Criteria

In the USA the recent FCC exposure criteria [FCC 2001] are based upon the IEEE Standard C95.1 [IEEE 1999]. The IEEE standard C95.1 sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz.

#### **4.2. Distinction Between Exposed Population, Duration of Exposure and Frequencies**

The American Standard [IEEE 1999] distinguishes between controlled and uncontrolled environment. Controlled environments are locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment or by other cognizant persons. Uncontrolled environments are locations where there is the exposure of individuals who have no knowledge or control of their exposure. The exposures may occur in living quarters or workplaces. For exposure in controlled environments higher field strengths are admissible. In addition the duration of exposure is considered. Due to the influence of frequency on important parameters, as the penetration depth of the electromagnetic fields into the human body and the absorption capability of different tissues, the limits in general vary with frequency.

#### **4.3. Distinction between Maximum Permissible Exposure and SAR Limits**

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength  $E$  inside the human body, the conductivity  $\sigma$  and the mass density  $\rho$  of the biological tissue:

$$SAR = \sigma \frac{E^2}{\rho} = c \left. \frac{\partial T}{\partial t} \right|_{t \rightarrow 0+}$$

The specific absorption rate describes the initial rate of temperature rise  $\partial T / \partial t$  as a function of the specific heat capacity  $c$  of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric  $E$  and magnetic field strength  $H$  and power density  $S$ , derived from the SAR limits. The limits for  $E$ ,  $H$  and  $S$  have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded.

For the relevant frequency range the maximum permissible exposure may be exceeded if the exposure can be shown by appropriate techniques to produce SAR values below the corresponding limits.



#### 4.4. SAR Limit

In this report the comparison between the American exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 1 g (SAR<sub>1g</sub>) with the shape of a cube.

Standard	Status	SAR limit (W/kg )
IEEE C95.1	In force	1.6

Table 1: Relevant spatial peak SAR limit averaged over a mass of 1 g

## **5. The FCC Measurement Procedure**

The Federal Communications Commission (FCC) has published a report and order on the 1st of August 1996 [FCC 1996], which requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radiofrequency emissions [FCC 2001].

### **5.1. General Requirements**

The test shall be performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature shall be in the range of 20°C to 26°C and 30-70% humidity.

### **5.2. Test Positions**

Recommended SAR Test positions in OET document "Mobile and Portable Device RF Exposure Equipment Authorization procedures" for notebooks with antennas or integral-antenna transmitters in the keyboard section is lap-held with the bottom of the computer in direct contact against the phantom.

### **5.3. Body-worn and Other Configurations**

#### **Phantom Requirements**

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

#### **Test Position**

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration. Devices with a headset output shall be tested with a connected headset.

#### **Test to be Performed**

For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do. For multiple accessories that do not contain metallic components, the device may be tested only with that accessory which provides the closest spacing to the body. For multiple accessories that contain metallic components, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component, only the accessory that provides the closest spacing to the body must be tested. If the manufacturer provides none body-

Error! Reference This report shall not be reproduced except in full without the written approval of:  
source not found.

worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value.

#### **5.4. Procedure for assessing the peak spatial-average SAR**

##### **Step 1: Power reference measurement:**

Prior to the SAR test, a local SAR measurement should be taken at a user-selected spatial reference point to monitor power variations during testing. For example, this power reference point can be spaced 10 mm or less in the normal direction from the liquid-shell interface and within  $\pm 10$  mm transverse to the normal line at the ear reference point.

##### **Step 2: Area scan**

The measurement procedures for evaluating SAR associated with wireless handsets typically start with a coarse measurement grid in order to determine the approximate location of the local peak SAR values. This is referred to as the "area scan" procedure. The SAR distribution is scanned along the inside surface of typically half of the head of the phantom but at least larger than the areas projected (normal to the phantom's surface) by the handset and antenna. An example grid is given in Figure 4. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (variation less than  $\pm 1$  mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient precision. The distance between the measurement points should enable the detection of the location of local maximum with an accuracy of better than half the linear dimension of the tissue cube after interpolation. The resolution can also be tested using the functions in Annex E (see E.5.2). The approximate locations of the peak SARs should be determined from area scan. Since a given amplitude local peak with steep gradients may produce lower spatial-average SAR than slightly lower amplitude peaks with less steep gradients, it is necessary to evaluate the other peaks as well. However, since the spatial gradients of local SAR peaks are a function of wavelength inside the tissue simulating liquid and incident magnetic field strength, it is not necessary to evaluate peaks that are less than  $-2$  dB of the local maximum. Two-dimensional spline algorithms [Press, et al, 1996], [Brishoual, 2001] are typically used to determine the peaks and gradients within the scanned area. If the peak is closer than one-half of the linear dimension of the 1 g or 10 g tissue cube to the scan border, the measurement area should be enlarged if possible, e.g., by tilting the probe or the phantom (see Figure 5).

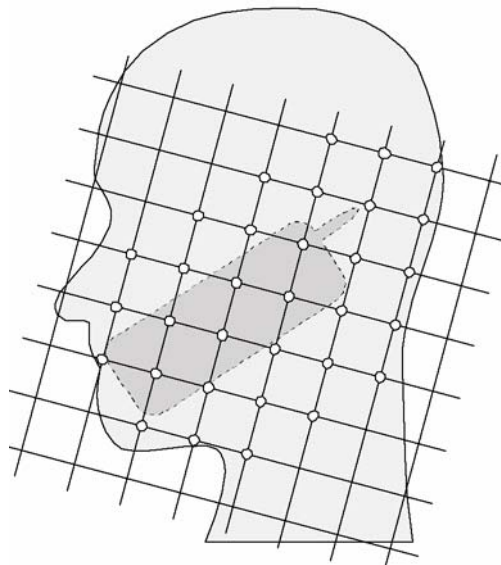


Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

### Step 3: Zoom scan

In order to assess the peak spatial SAR values averaged over a 1 g and 10 g cube, fine resolution volume scans, called "zoom scans", are performed at the peak SAR locations determined during the "area scan." The zoom scan volume should have at least 1.5 times the linear dimension of either a 1 g or a 10 g tissue cube for whichever peak spatial-average SAR is being evaluated. The peak local SAR locations that were determined in the area scan (interpolated value) should be on the centerline of the zoom scans. The centerline is the line that is normal to the surface and in the center of the volume scan. If this is not possible, the zoom scan can be shifted but not by more than half the dimension of the 1 g or a 10 g tissue cube.

The maximum spatial-average SAR is determined by a numerical analysis of the SAR values obtained in the volume of the zoom scan, whereby interpolation (between measured points) and extrapolation (between surface and closest measured points) routines should be applied. A 3-D-spline algorithm [Press, et al, 1996], [Kreyszig, 1983], [Brishoual, 2001] can be used for interpolation and a trapezoidal algorithm for the integration (averaging). Scan resolutions of larger than 2 mm can be used provided the uncertainty is evaluated according to E (see E.5).

In some areas of the phantom, such as the jaw and upper head region, the angle of the probe with respect to the line normal to the surface might become large, e.g., at angles larger than  $\pm 30^\circ$  (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced ( $<30^\circ$ ).

**Step 4: Power reference measurement**

The local SAR should be measured at exactly the same location as in Step 1. The absolute value of the measurement drift (the difference between the SAR measured in Step 4 and Step 1) should be recorded in the uncertainty budget. It is recommended that the drift be kept within  $\pm 5\%$ . If this is not possible, even with repeat testing, additional information may be used to demonstrate the power stability during the test. Power reference measurements can be taken after each zoom scan, if more than one zoom scan is needed. However, the drift should always be referred to the initial state with fully charged battery.

**5.5. Determination of the largest peak spatial-average SAR**

In order to determine the largest value of the peak spatial-average SAR of a handset, all device positions, configurations and operational modes should be tested for each frequency band according to steps 1 to 3 below.

**Step 1:** The tests of 6.4 should be conducted at the channel that is closest to the center of the transmit frequency band ( $f_c$ ) for:

- a) all device positions (cheek and tilt, for both left and right sides of the SAM phantom,
- b) all configurations for each device position in (a), e.g. antenna extended and retracted, and
- c) all operational modes for each device position in (a) and configuration in (b) in each frequency band, e.g. analog and digital.

If more than three frequencies need to be tested, (i.e.,  $N_c > 3$ ), then all frequencies, configurations and modes must be tested for all of the above positions.

**Step 2:** For the condition providing highest spatial peak SAR determined in Step 1 conduct all tests of 6.4 at all other test frequencies, e.g. lowest and highest frequencies. In addition, for all other conditions (device position, configuration and operational mode) where the spatial peak SAR value determined in Step 1 is within 3dB of the applicable SAR limit, it is recommended that all other test frequencies should be tested as well<sup>1</sup>.

**Step 3:** Examine all data to determine the largest value of the peak spatial-average SAR found in Steps 1 to 2.

---

Error! Reference source not found. This report shall not be reproduced except in full without the written approval of:

## 6. The Measurement System

### 6.1. Robot system specification

The SAR measurement system being used is the IndexSAR SARA2 system, which consists of a Mitsubishi RV-E2 6-axis robot arm and controller, IndexSAR probe and amplifier and SAM phantom Head Shape. The robot is used to articulate the probe to programmed positions inside the phantom head to obtain the SAR readings from the DUT.

The system is controlled remotely from a PC, which contains the software to control the robot and data acquisition equipment. The software also displays the data obtained from test scans.

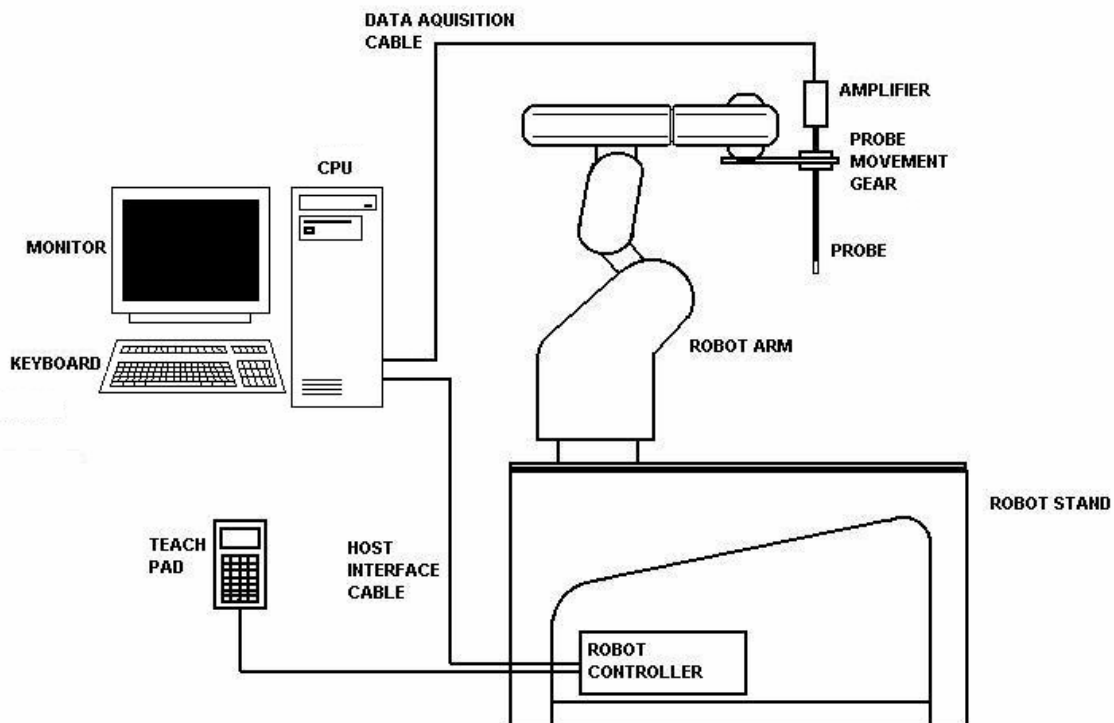


Figure 5: Schematic diagram of the SAR measurement system

The position and digitized shape of the phantom heads are made available to the software for accurate positioning of the probe and reduction of set-up time.

The SAM phantom heads are individually digitized using a Mitutoyo CMM machine to a precision of 0.001mm. The data is then converted into a shape format for the software, providing an accurate description of the phantom shell.

In operation, the system first does an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom. When the maximum SAR point has been found, the system will then carry out a 3D scan centered at that point to determine volume averaged SAR level.

## **6.2. Probe and amplifier specification**

### **IXP-050 Indexsar isotropic immersible SAR probe**

The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in the probe's calibration certificate (see appendix C.). The system uses diode compression potential (DCP) to determine SAR values for different types of modulation. Crest factor is not used for determining SAR values. The DCP for different types of modulation is determined during the probe calibration procedure. For a more detailed explanation see *IndexSAR Immesible SAR Probe Calibration Report* included in Appendix C of this report.

### **IXP-010 Amplifier**

The amplifier unit has a multi-pole connector to connect to the probe and a multiplexer selects between the 3-channel single-ended inputs. A 16-bit AtoD converter with programmable gain is used along with an on-board micro-controller with non-volatile firmware. Battery life is around 150 hours and data are transferred to the PC via 3m of duplex optical fiber and a self-powered RS232 to optical converter.

## **6.3. Phantoms**

The Specific Anthropomorphic Mannequin (SAM) Upright Phantom is fabricated using moulds generated from the CAD files as specified by CENELEC EN50361. It is mounted via a rotation base to a supporting table, which also holds the robotic positioner. The phantom and robot alignment is assured by both mechanical and laser registration systems. The box phantom used for body testing and for validation is manufactured from Perspex. The material is 2 mm in thickness on the test surfaces and 4 mm in thickness on the other surfaces. Its dimensions are: X=21 cm., Y=20.5 cm., Z=16 cm.



#### 6.4. SAR measurement procedure



Figure 6: Principal components of the SAR measurement test bench

The major components of the test bench are shown in the picture above. A test set and dipole antenna control the handset via an air link and a low-mass phone holder can position the phone at either ear. Graduated scales are provided to set the phone in the 15 degree position. The upright phantom head holds approx. 7 liters of simulant liquid. The phantom is filled and emptied through a 45mm diameter penetration hole in the top of the head.

After an area scan has been done at a fixed distance of 8mm from the surface of the phantom on the source side, a 3D scan is set up around the location of the maximum spot SAR. First, a point within the scan area is visited by the probe and a SAR reading taken at the start of testing. At the end of testing, the probe is returned to the same point and a second reading is taken. Comparison between these start and end readings enables the power drift during measurement to be assessed.

#### 6.5. SARA2 Interpolation and Extrapolation schemes

(see support document IXS-0202)

SARA2 software contains support for both 2D cubic B-spline interpolation as well as 3D cubic B-spline interpolation. In addition, for extrapolation purposes, a general n-th order polynomial fitting routine is implemented following a singular value decomposition algorithm presented in [4]. A 4th order polynomial fit is used by default for data extrapolation, but a linear-logarithmic fitting function can be selected as an option. The polynomial fitting procedures have been tested by comparing the fitting coefficients generated by the SARA2 procedures with those obtained using the polynomial fit functions of Microsoft Excel when applied to the same test input data.

Error! Reference source not found. This report shall not be reproduced except in full without the written approval of:



## **6.6. Interpolation of 2D area scan**

The 2D cubic B-spline interpolation is used after the initial area scan at fixed distance from the phantom shell wall. The initial scan data are collected with approx. 10mm spatial resolution and spline interpolation is used to find the location of the local maximum to within a 1mm resolution for positioning the subsequent 3D scanning.

## **6.7. Extrapolation of 3D scan**

For the 3D scan, data are collected on a spatially regular 3D grid having (by default) 6.4 mm steps in the lateral dimensions and 3.5 mm steps in the depth direction (away from the source). SARA2 enables full control over the selection of alternative step sizes in all directions.

The digitized shape of the head is available to the SARA2 software, which decides which points in the 3D array are sufficiently well within the shell wall to be 'visited' by the SAR probe. After the data collection, the data are extrapolated in the depth direction to assign values to points in the 3D array closer to the shell wall. A notional extrapolation value is also assigned to the first point outside the shell wall so that subsequent interpolation schemes will be applicable right up to the shell wall boundary.

## **6.8. Interpolation of 3D scan and volume averaging**

The procedure used for defining the shape of the volumes used for SAR averaging in the SARA2 software follow the method of adapting the surface of the 'cube' to conform with the curved inner surface of the phantom (see Appendix D in FCC Supplement C edition 01-01 to OET Bulletin 65 edition 97-01). This is called, here, the conformal scheme.

For each row of data in the depth direction, the data are extrapolated and interpolated to less than 1mm spacing and average values are calculated from the phantom surface for the row of data over distances corresponding to the requisite depth for 10g and 1g cubes. This results in two 2D arrays of data, which are then cubic B-spline interpolated to sub mm lateral resolution. A search routine then moves an averaging square around through the 2D array and records the maximum value of the corresponding 1g and 10g volume averages. For the definition of the surface in this procedure, the digitized position of the headshell surface is used for measurement in head-shaped phantoms. For measurements in rectangular, box phantoms, the distance between the phantom wall and the closest set of girded data points is entered into the software. For measurements in box-shaped phantoms, this distance is under the control of the user. The effective distance must be greater than 2.5mm as this is the tip-sensor distance and to avoid interface proximity effects, it should be at least 5mm. A value of 6 or 8mm is recommended. This distance is called **dbe**.

For automated measurements inside the head, the distance cannot be less than 2.5mm, which is the radius of the probe tip and to avoid interface proximity effects, a minimum clearance distance

of x mm is retained. The actual value of dbe will vary from point to point depending upon how the spatially-regular 3D grid points fit within the shell. The greatest separation is when a grid point is just not visited due to the probe tip dimensions. In this case the distance could be as large as the step-size plus the minimum clearance distance (i.e with  $x=5$  and a step size of 3.5, **dbe** will be between 3.5 and 8.5mm).

The default step size (**dstep**) used is 3.5mm, but this is under user-control. The compromise is with time of scan, so it is not practical to make it much smaller or scan times become long and power-drop influences become larger.

The robot positioning system specification for the repeatability of the positioning (**dss**) is +/- 0.04mm.

The phantom shell is made by an industrial molding process from the CAD files of the SAM shape, with both internal and external moulds. For the upright phantoms, the external shape is subsequently digitized on a Mitutoyo CMM machine (Euro an ultrasonic sensor indicate that the shell thickness (**dph**) away from the ear is 2.0 +/- 0.1mm. The ultrasonic measurements were calibrated using additional mechanical measurements on available cut surfaces of the phantom shells. See support document IXS-020x.

For the upright phantom, the alignment is based upon registration of the rotation axis of the phantom on its 253mm diameter baseplate bearing and the position of the probe axis when commanded to go to the axial position. A laser alignment tool is provided (procedure detailed elsewhere). This enables the registration of the phantom tip (**dmis**) to be assured to within approx. 0.2mm. This alignment is done with reference to the actual probe tip after installation and probe alignment. The rotational positioning of the phantom is variable – offering advantages for special studies, but locating pins ensure accurate repositioning at the principal positions (LH and RH ears).

## **7. Uncertainty Assessment**

Measurement uncertainty values were evaluated for SAR measurements performed by Cetecom Inc. The uncertainty values for components specified in *FCC Supplement C (01-01) to OET Bulletin 65 (97-01)* were evaluated according to the procedures of *IEEE 1528-200X December 29, 2002*, *NIST 1297 1994 edition* and *ISO Guide to the Expression of Uncertainty in Measurements (GUM)*.

### 7.1. Measurement Uncertainty Budget

<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>e = f(d,k)</b>	<b>f</b>	<b>g = c x f / e</b>	<b>k</b>
<b>Uncertainty Component</b>	<b>Sec.</b>	<b>Tol. (± %)</b>	<b>Prob. Dist.</b>	<b>Div.</b>	<b>c<sub>i</sub> (1-g)</b>	<b>1-g u<sub>i</sub> (±%)</b>	<b>v<sub>i</sub></b>
<b>Measurement System</b>							
Probe Calibration	E2.1	3.6	N	1	1	3.6	∞
Axial Isotropy	E2.2	4.23	R	√3	(1-cp) <sup>1/2</sup>	0.00	∞
Hemispherical Isotropy	E2.2	10.7	R	√3	√c <sub>p</sub>	6.18	∞
Boundary Effect	E2.3	1.7	R	√3	1	0.98	∞
Linearity	E2.4	2.92	R	√3	1	1.69	∞
System Detection Limits	E2.5	0.00	R	√3	1	0.00	∞
Readout Electronics	E2.6	0.00	N	1	1	0.00	∞
Response Time	E2.7	0.00	R	√3	1	0.00	∞
Integration Time	E2.8	0.0	R	√3	1	0.23	∞
RF Ambient Conditions	E6.1	0.00	R	√3	1	0.00	∞
Probe Positioner Mechanical Tolerance	E6.2	0.57	R	√3	1	0.33	∞
Probe Positioning with respect to Phantom Shell	E6.3	1.43	R	√3	1	0.83	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	3.6	R	√3	1	2.08	∞
<b>Test sample Related</b>							
Test Sample Positioning	E4.2	4.81	N	1	1	4.81	29
Device Holder Uncertainty	E4.1	0.00	N	1	1	0.00	0
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	√3	1	2.89	∞
<b>Phantom and Tissue Parameters</b>							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	1.43	R	√3	1	0.83	∞
Liquid Conductivity Target - tolerance	E3.2	5.0	R	√3	0.7	2.02	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.0	R	√3	0.7	0.81	∞
Liquid Permittivity Target tolerance	E3.2	5.0	R	√3	0.6	1.73	∞
Liquid Permittivity - measurement uncertainty	E3.3	1.0	R	√3	0.6	0.35	∞
<b>Combined Standard Uncertainty</b>						<b>± 10.0%</b>	
<b>Expanded Uncertainty (95% CONFIDENCE INTERVAL)</b>						<b>± 20.1%</b>	
			RSS				
			k=				
			2.00705				

Error! Reference This report shall not be reproduced except in full without the written approval of:  
source not found.

## 8. Test results summary

### 8.1. Conducted Output Power

Consistent with original filing

### 8.2. Test Positions and Configurations

The WLAN module was set to transmit without antenna diversity. N mode was tested with 40MHz bandwidth and both antennas transmitting simultaneously. If two peaks were found, SAR evaluations were performed on each peak individually. All measurements were done with the device directly against the phantom. The area scan of the measurement was centered over the transmitting antenna.

SAR is not required for 802.11 g channels when the max. average output power is less than ¼ dB higher than that measured on the corresponding 802.11b channels.

Secondary landscape position is disabled.

### 8.3. 2400 MHz band SAR Results for PP12S with Yageo antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	6 / 2437	0.045	Plot 1	Photo 1
Main / Bump	Side	6 / 2437	0.059	Plot 2	Photo 2
Aux / Bump	Lap	6 / 2437	0.164	Plot 3	Photo 1
Aux / Bump	Side	6 / 2437	0.095	Plot 4	Photo 2
Main / No Bump	Lap	6 / 2437	0.081	Plot 5	Photo 1
Main / No Bump	Side	6 / 2437	0.145	Plot 6	Photo 3
Aux / No Bump	Lap	6 / 2437	0.199	Plot 7	Photo 1
Aux / No Bump	Side	6 / 2437	0.156	Plot 8	Photo 3
N mode / Bump	Lap	6 / 2437	0.056	Plot 9	Photo 1
N mode / Bump	Side	6 / 2437	0.015	Plot 10	Photo 2
N mode / No Bump	Lap	6 / 2437	0.032	Plot 11	Photo 1
N mode / No Bump	Side	6 / 2437	0.082	Plot 12	Photo 3

#### 8.4. 5200 MHz band SAR Results for PP12S with Yageo antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	48 / 5240	0.000	Plot 13	Photo 1
Main / Bump	Side	48 / 5240	0.000	Plot 14	Photo 2
Aux / Bump	Lap	48 / 5240	0.000	Plot 15	Photo 1
Aux / Bump	Side	48 / 5240	0.000	Plot 16	Photo 2
Main / No Bump	Lap	48 / 5240	0.000	Plot 17	Photo 1
Main / No Bump	Side	48 / 5240	0.000	Plot 18	Photo 3
Aux / No Bump	Lap	48 / 5240	0.000	Plot 19	Photo 1
Aux / No Bump	Side	48 / 5240	0.000	Plot 20	Photo 3

#### 8.5. 5600 MHz band SAR Results for PP12S with Yageo antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	120 / 5600	0.000	Plot 21	Photo 1
Main / Bump	Side	120 / 5600	0.000	Plot 22	Photo 2
Aux / Bump	Lap	120 / 5600	0.000	Plot 23	Photo 1
Aux / Bump	Side	120 / 5600	0.000	Plot 24	Photo 2
Main / No Bump	Lap	120 / 5600	0.000	Plot 25	Photo 1
Main / No Bump	Side	120 / 5600	0.000	Plot 26	Photo 3
Aux / No Bump	Lap	120 / 5600	0.000	Plot 27	Photo 1
Aux / No Bump	Side	120 / 5600	0.000	Plot 28	Photo 3

### 8.6. 5800 MHz band SAR Results for PP12S with Yageo antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	157 / 5785	0.000	Plot 29	Photo 1
Main / Bump	Side	157 / 5785	0.000	Plot 30	Photo 2
Aux / Bump	Lap	157 / 5785	0.000	Plot 31	Photo 1
Aux / Bump	Side	157 / 5785	0.000	Plot 32	Photo 2
Main / No Bump	Lap	157 / 5785	0.000	Plot 33	Photo 1
Main / No Bump	Side	157 / 5785	0.000	Plot 34	Photo 3
Aux / No Bump	Lap	157 / 5785	0.000	Plot 35	Photo 1
Aux / No Bump	Side	157 / 5785	0.000	Plot 36	Photo 3

### 8.7. 2400 MHz band SAR Results for PP12S with Amphenol antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	6 / 2437	0.147	Plot 37	Photo 1
Main / Bump	Side	6 / 2437	0.128	Plot 38	Photo 2
Aux / Bump	Lap	6 / 2437	0.097	Plot 39	Photo 1
Aux / Bump	Side	6 / 2437	0.078	Plot 40	Photo 2
Main / No Bump	Lap	6 / 2437	0.098	Plot 41	Photo 1
Main / No Bump	Side	6 / 2437	0.036	Plot 42	Photo 3
Aux / No Bump	Lap	6 / 2437	0.087	Plot 43	Photo 1
Aux / No Bump	Side	6 / 2437	0.151	Plot 44	Photo 3
N mode / Bump	Lap	6 / 2437	0.031	Plot 45	Photo 1
N mode / Bump	Side	6 / 2437	0.044	Plot 46	Photo 2
N mode / No Bump	Lap	6 / 2437	0.027	Plot 47	Photo 1
N mode / No Bump	Side	6 / 2437	0.045	Plot 48	Photo 3

### 8.8. 5200 MHz band SAR Results for PP12S with Amphenol antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	48 / 5240	0.000	Plot 49	Photo 1
Main / Bump	Side	48 / 5240	0.000	Plot 50	Photo 2
Aux / Bump	Lap	48 / 5240	0.000	Plot 51	Photo 1
Aux / Bump	Side	48 / 5240	0.000	Plot 52	Photo 2
Main / No Bump	Lap	48 / 5240	0.000	Plot 53	Photo 1
Main / No Bump	Side	48 / 5240	0.000	Plot 54	Photo 3
Aux / No Bump	Lap	48 / 5240	0.000	Plot 55	Photo 1
Aux / No Bump	Side	48 / 5240	0.000	Plot 56	Photo 3

### 8.9. 5600 MHz band SAR Results for PP12S with Amphenol antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	120 / 5600	0.000	Plot 57	Photo 1
Main / Bump	Side	120 / 5600	0.000	Plot 58	Photo 2
Aux / Bump	Lap	120 / 5600	0.000	Plot 59	Photo 1
Aux / Bump	Side	120 / 5600	0.000	Plot 60	Photo 2
Main / No Bump	Lap	120 / 5600	0.000	Plot 61	Photo 1
Main / No Bump	Side	120 / 5600	0.000	Plot 62	Photo 3
Aux / No Bump	Lap	120 / 5600	0.000	Plot 63	Photo 1
Aux / No Bump	Side	120 / 5600	0.000	Plot 64	Photo 3



### 8.10. 5800 MHz band SAR Results for PP12S with Amphenol antenna

Transmit Antenna / Configuration	Position	Channel / Frequency (MHz)	1g SAR (W/kg)	Area scan (See Appendix A)	Positioning photo (See Appendix B)
Main / Bump	Lap	157 / 5785	0.000	Plot 65	Photo 1
Main / Bump	Side	157 / 5785	0.000	Plot 66	Photo 2
Aux / Bump	Lap	157 / 5785	0.000	Plot 67	Photo 1
Aux / Bump	Side	157 / 5785	0.000	Plot 68	Photo 2
Main / No Bump	Lap	157 / 5785	0.000	Plot 69	Photo 1
Main / No Bump	Side	157 / 5785	0.000	Plot 70	Photo 3
Aux / No Bump	Lap	157 / 5785	0.000	Plot 71	Photo 1
Aux / No Bump	Side	157 / 5785	0.000	Plot 72	Photo 3

### 8.11. Dipole Validation Check Results

Prior to formal testing at each frequency a system verification was performed in accordance with IEEE 1528. The balanced dipole source was placed at the specified distance in horizontal orientation. All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

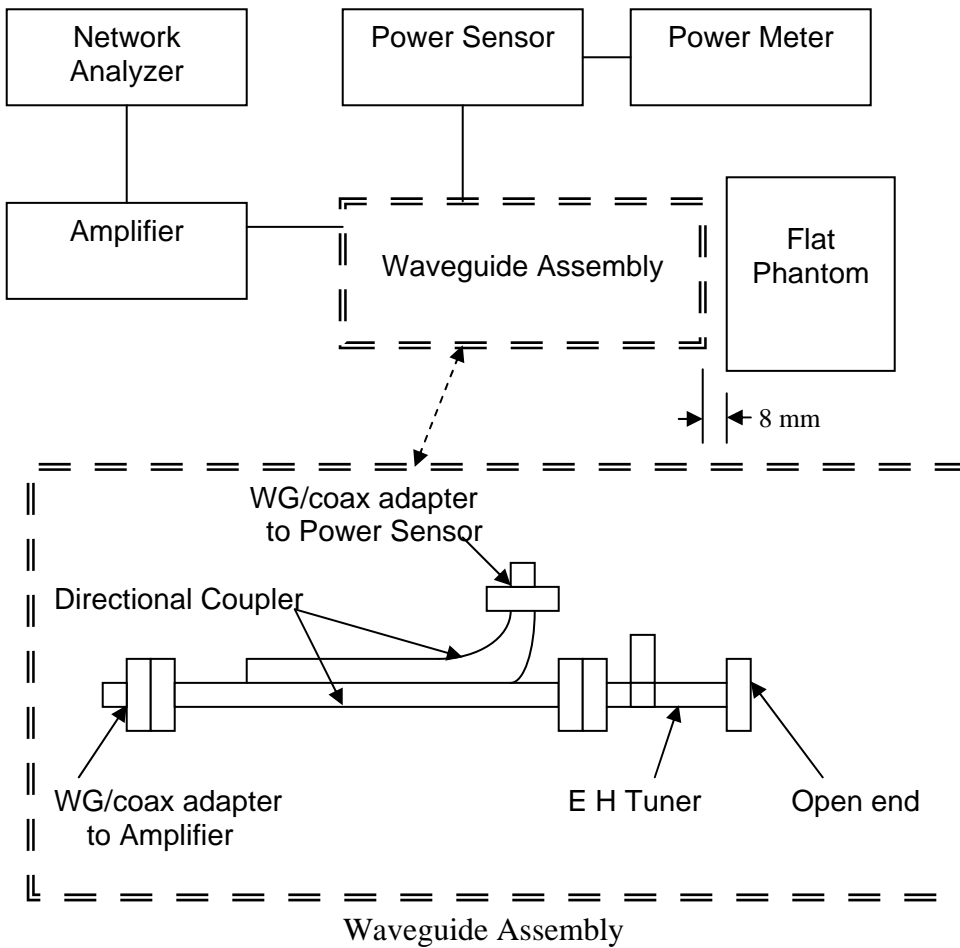
Date	Frequency (MHz)	CW input at dipole feed (Watts)	1g SAR (W/kg)	1 Watt reference SAR value from IEEE 1528 (W/kg)	Difference reference SAR value to normalized SAR	Area scan (See Appendix A)
10/30/08	2450	1.0	49.152	52.4	-6.20%	Plot 73
10/31/08	2450	1.0	49.752	52.4	-5.05%	Plot 74

### 8.12. Waveguide Validation Check Results

The above 5 GHz verification method uses an open-ended waveguide as the radiating source. A waveguide assembly using WR187 (3.95GHz - 5.85 GHz) components is assembled. The waveguide assembly was placed with its open end 8 mm from the liquid filled flat phantom. A micrometer was used to verify the distance and to verify that the waveguide surface was perpendicular to the phantom surface. The input cable to the waveguide assembly was connected to a network analyzer to measure the return loss. The EH tuner in the waveguide assembly was adjusted until a return loss of 40 dB or better was achieved. The input cable was then connected as shown in the setup diagram below. A complete SAR scan is then performed using the same scan settings (scan dimensions, step size, boundary corrections, etc.) that will be used for compliance testing. The results are compared to FDTD calculations of the SAR distributions for a nearly identical setup that was performed by Om P. Gandhi at the University of Utah and published in standard IEC 62209-2.

Date	Frequency (MHz)	CW input at dipole feed (Watts)	1g SAR (W/kg)	1 Watt reference SAR value from IEEE 1528 (W/kg)	Difference reference SAR value to normalized SAR	Area scan (See Appendix A)
11/04/08	5200	0.1	3.434	3.57	-3.81%	Plot 75
11/11/08	5200	0.1	3.864	3.57	8.24%	Plot 76
11/05/08	5800	0.1	4.331	3.95	9.65%	Plot 77
11/11/08	5800	0.1	4.067	3.95	2.96%	Plot 78

**Setup Diagram:**



All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

Error! Reference source not found. This report shall not be reproduced except in full without the written approval of:

## 9. References

1. [FCC 2001] Federal Communications Commission: Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01), FCC, 2001.
2. [IEEE 1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, Inst. of Electrical and Electronics Engineers, Inc., 1999.
3. [IEEE 200x] IEEE Std 1528-200x: DRAFT Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques. Draft 6.2, Inst. of Electrical and Electronics Engineers, Inc., 2000.
4. [NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results, Technical Note 1297 (TN1297), United States Department of Commerce Technology Administration, National Institute of Standards and Technology, 1994.
5. [IEEE 2007] Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques. Amendment 2: Additional Procedures for SAR Measurement at 3 – 6 GHz. Draft IEEE 1528b, March 8, 2007