



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

SAR EVALUATION REPORT

**FOR
802.11g Wireless LAN + Bluetooth PCI-E Mini Card
(Tested inside of HP Notebook PC, HSTNN-I71C)**

MODEL: BCM94312HMGB

FCC ID: QDS-BRCM1044

IC: 4324A-BRCM1044

REPORT NUMBER: 09U12862-1C

ISSUE DATE: November 17, 2009

Prepared for

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NVLAP LAB CODE 200065-0

Revision History

<u>Rev.</u>	<u>Issue Date</u>	<u>Revisions</u>	<u>Revised By</u>
--	October 23, 2009	Initial Issue	--
A	November 12, 2009	Updated KDB statement from 616217 to 447498 on page 16 in this report.	Sunny Shih
B	November 16, 2009	Updated Section 10 OUTPUT POWER VERIFICATION	Sunny Shih
C	November 17, 2009	Updated antenna separation distance in section 5	Sunny Shih

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1. ATTESTATION OF TEST RESULTS

COMPANY NAME: BROADCOM CORPORATION
 190 MATHILDA PLACE
 SUNNYVALE, CA 94086

EUT DESCRIPTION: 802.11g Wireless LAN + Bluetooth PCI-E Mini Card
 (Tested inside of HP Notebook PC, HSTNN-I71C)

MODEL NUMBER: BCM94312HMGB

DEVICE CATEGORY: Portable

EXPOSURE CATEGORY: General Population/Uncontrolled Exposure

DATE TESTED: October 21, 2009

MAX SAR VALUE:

FCC / IC Rule Parts	Frequency Range [MHz]	The Highest SAR Values (1g_mW/g)	Limit (mW/g)
15.247 / RSS-102	2400 – 2483.5	0.000869	1.6

APPLICABLE STANDARDS:

STANDARD	TEST RESULTS
FCC OET BULLETIN 65 SUPPLEMENT C <ul style="list-style-type: none"> o KDB 248227 SAR measurement procedures for 802.11 a/b/g transmitters o 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:

Tested By:

Sunny Shih

Chao-Yen Lin

SUNNY SHIH
 ENGINEERING SUPERVISOR
 COMPLIANCE CERTIFICATION SERVICES

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

5. EQUIPMENT UNDER TEST

802.11g Wireless LAN + Bluetooth 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

Other radio modules in host

Bluetooth

Antenna tested:

Manufactured Model Number

Yageo 6036B0055102 (Main)

6036B0054802 (Aux)

Antenna-to-antenna distance:

Bluetooth to WLAN main antenna: 59 mm

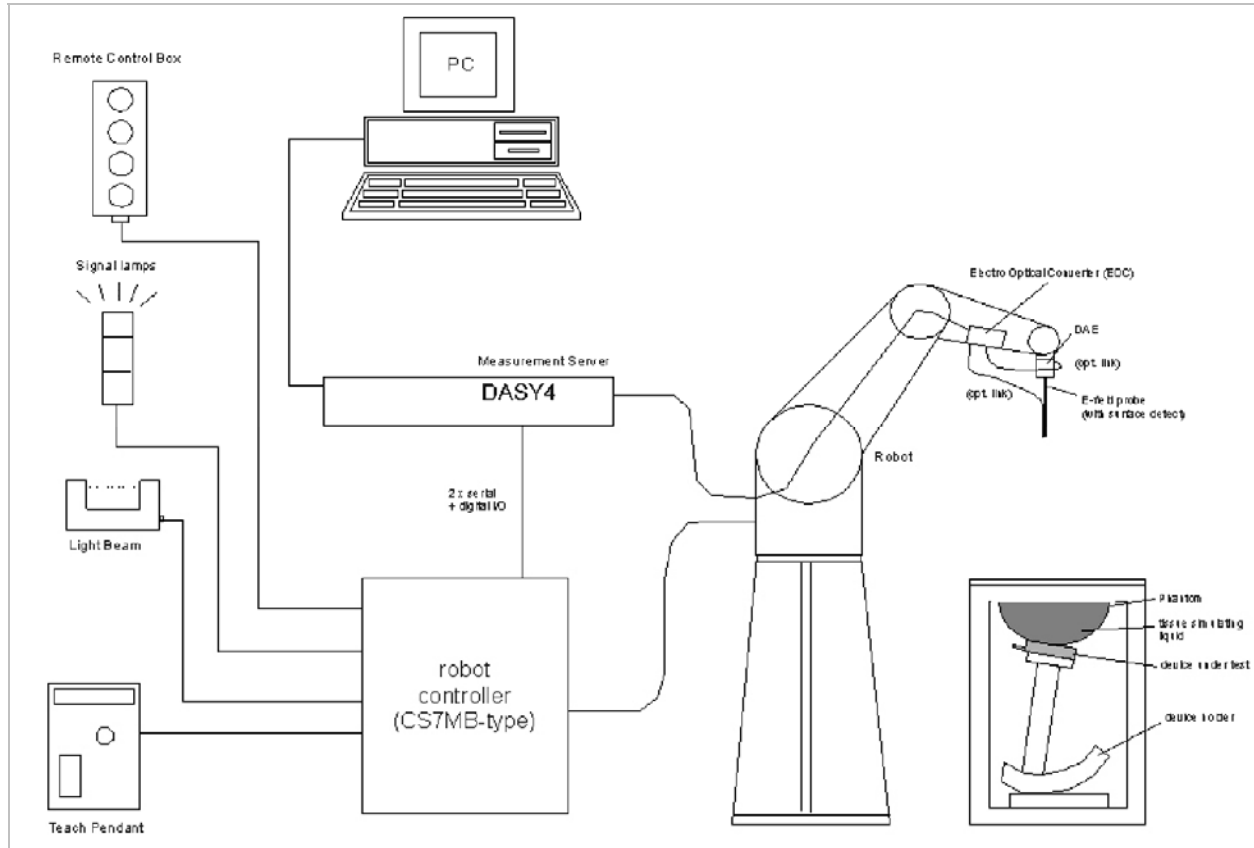
Notes:

1. WLAN Aux-to-Bluetooth are sharing a common antenna.
2. Bluetooth's output power is $\leq 60/f(\text{GHz})$ mW and measured WLAN 1-g SAR are < 0.4 W/kg, therefore simultaneous transmission SAR is not required.

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 if the dielectric parameters are within the tolerances of the specified target values. The relative permittivity and conductivity of the tissue material should be within $\pm 5\%$ 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 $\rho = 1000 \text{ kg/m}^3$)

8.1. LIQUID CHECK RESULTS

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'	53.16	Relative Permittivity (ϵ_r):	53.158	52.7	0.87	± 5
	e''	14.23	Conductivity (σ):	1.940	1.95	-0.54	± 5

Liquid Temperature: 23 deg. C
 October 21, 2009 8:16 AM

Frequency	e'	e''
2400000000	53.2538	13.983
2405000000	53.2417	14.0564
2410000000	53.2271	14.1216
2415000000	53.2235	14.1651
2420000000	53.2096	14.1913
2425000000	53.205	14.2095
2430000000	53.2107	14.2028
2435000000	53.1949	14.2089
2440000000	53.1905	14.2234
2445000000	53.1615	14.2511
2450000000	53.1576	14.2302
2455000000	53.0886	14.2068
2460000000	53.0525	14.1787
2465000000	52.9887	14.1415
2470000000	52.9733	14.0939
2475000000	52.9582	14.0697
2480000000	52.966	14.0768
2485000000	52.9592	14.0959
2490000000	52.9616	14.1532
2495000000	52.9635	14.227
2500000000	52.9586	14.3299

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 e'' = 2 \pi f \epsilon_0 e''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

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 $\pm 10\%$.

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 $\pm 3\%$.
- 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 21, 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:	54.7	51.2	6.84	±10
			10g SAR:	25.5	23.7	7.59	

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. SUMMARY OF TEST RESULTS

11.1. SAR TEST RESULT FOR THE BAND 2400 – 2483.5 MHZ

11.1.1. LAPHELD POSITION

Mode	Channel	f (MHz)	Antenna	Measured SAR 1g (mW/g)	Limit (mW/g)
802.11b	1	2412			1.6
	6	2437	Main	0.000091	
	11	2462			
802.11g	1	2412			1.6
	6	2437	Aux	0.000869	
	11	2462			

Notes:

1. 802.11b doesn't operate for Aux antenna. Thus, 802.11g is performed for Aux antenna instead.
2. The modes with highest output power channel were chosen for the testing.
3. Test configuration: Lapheld with display open at 90° to the keyboard.
4. The SAR measured at the middle channel for this configuration is at least 3 dB lower (0.8 mW/g) than SAR limit (1.6 mW/g), thus testing at low & high channel is optional.
5. Per KDB447498 2), SAR evaluation for simultaneous transmission is not required.

12. Enhanced Energy Coupling (KDB 447498)

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, a single point SAR at 5 (mm) from the initial touching position is less than 50% of that measured at the initial position. Thus, additional SAR evaluation is not required.

	SAR (mw/g)	E-field (V/m)	Lower than Initial (%)
Initial	0.000869	1.391	
5 (mm)	0.000368657	0.906	42.4%

13. SAR TEST PLOTS

SAR PLOT for Main Antenna

Date/Time: 10/21/2009 11:15:57 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; $\sigma = 1.93$ mho/m; $\epsilon_r = 53.2$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Room Ambient Temperature: 24.0 deg. C; Liquid Temperature: 23.0 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: 9/15/2009
- Phantom: Flat Phantom ELI4.0; Type: QDOVA001BA; Serial: SN:XXXX
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

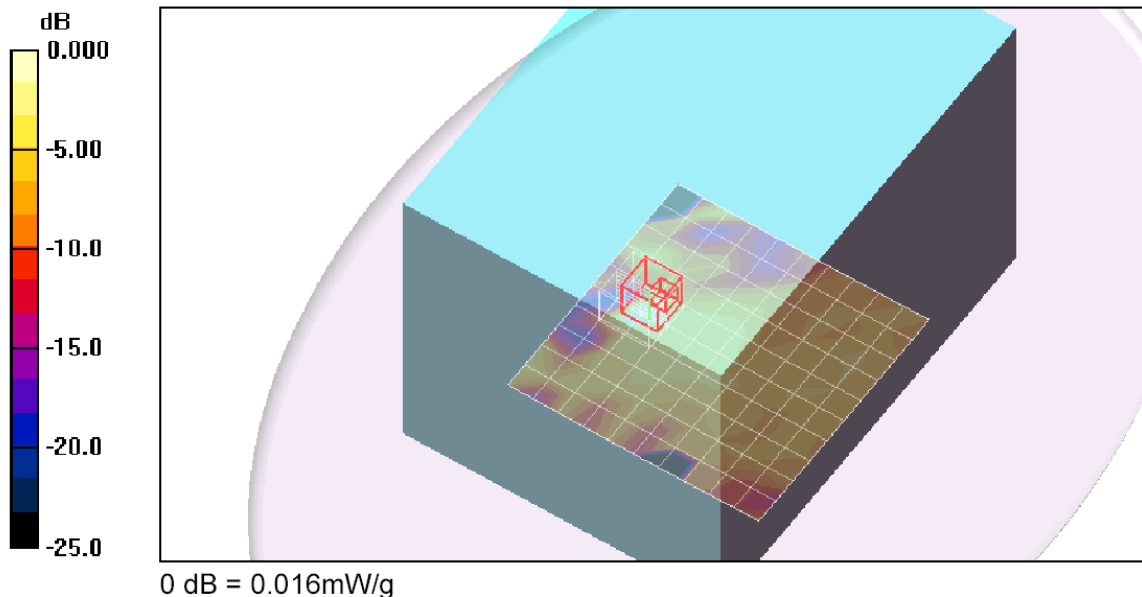
802.11b M-ch Main Antenna/Area Scan (11x11x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.041 mW/g

802.11b M-ch Main Antenna/Zoom Scan (7x7x9)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=3mm

Reference Value = 1.98 V/m; Power Drift = -0.230 dB
Peak SAR (extrapolated) = 0.007 W/kg
SAR(1 g) = 9.06e-005 mW/g; SAR(10 g) = 1.14e-005 mW/g

Maximum value of SAR (measured) = 0.016 mW/g



SAR PLOT for Aux Antenna

Date/Time: 10/21/2009 2:01:42 PM

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; $\sigma = 1.93$ mho/m; $\epsilon_r = 53.2$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Room Ambient Temperature: 24.0 deg. C; Liquid Temperature: 23.0 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: 9/15/2009
- Phantom: Flat Phantom ELI4.0; Type: QDOVA001BA; Serial: SN:XXXX
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

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

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

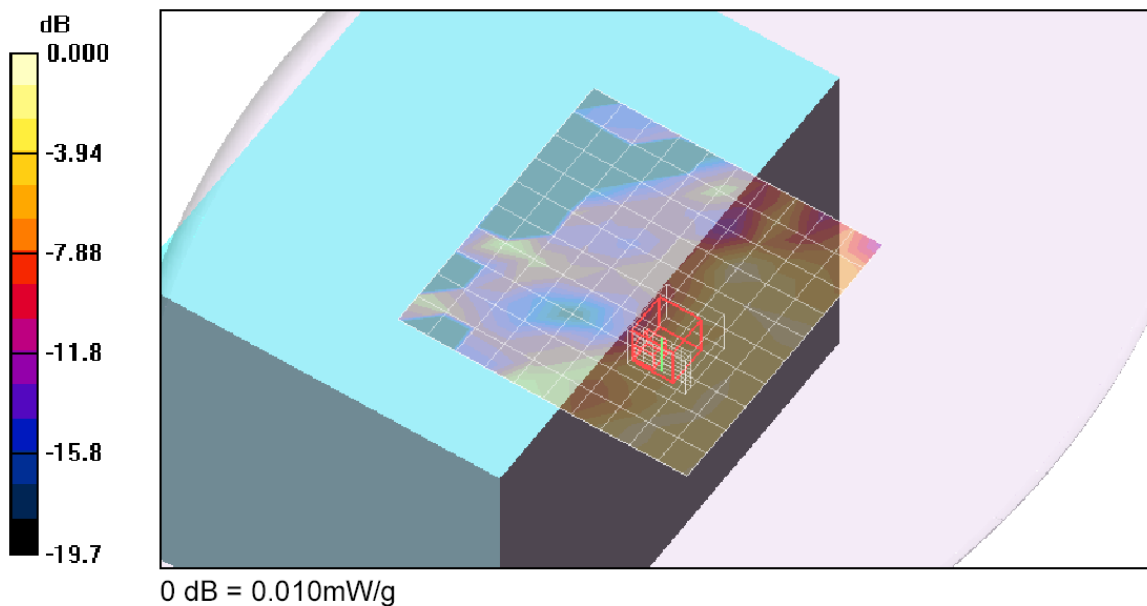
802.11g M-ch Aux Antenna/Zoom Scan (7x7x9)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=3mm

Reference Value = 0.722 V/m; Power Drift = 2.80 dB

Peak SAR (extrapolated) = 0.015 W/kg

SAR(1 g) = 0.000869 mW/g; SAR(10 g) = 0.000293 mW/g

Maximum value of SAR (measured) = 0.010 mW/g



14. 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