

SAR Compliance Test Report

| | | | |
|--|---|-------------------------|---|
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| Tested device: | RH-66 | | |
| FCC ID: | QMNRH-66 | IC: | 661X-RH66 |
| Supplement reports: | - | | |
| Testing has been carried out in accordance with: | <p>47CFR §2.1093 Radiofrequency Radiation Exposure Evaluation: Portable Devices</p> <p>FCC OET Bulletin 65 (Edition 97-01), Supplement C (Edition 01-01) Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields</p> <p>RSS-102 Evaluation Procedure for Mobile and Portable Radio Transmitters with Respect to Health Canada's Safety Code 6 for Exposure of Humans to Radio Frequency Fields</p> <p>IEEE 1528 - 2003 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques</p> | | |
| Documentation: | The documentation of the testing performed on the tested devices is archived for 15 years at TCC Dallas. | | |
| Test results: | The tested device complies with the requirements in respect of all parameters subject to the test. The test results and statements relate only to the items tested. The test report shall not be reproduced except in full, without written approval of the laboratory. | | |

Date and signatures: 01-Dec-04
For the contents:



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1. SUMMARY OF SAR TEST REPORT

1.1 Test Details

| | |
|--|---|
| Period of test | 16-Nov-04 to 22-Nov-04 |
| SN, HW and SW numbers of tested device | SN: 044/06108574 HW: S1.2 SW: R100b02.nep |
| Batteries used in testing | BL-6C |
| Headsets used in testing | HS-3 |
| Other accessories used in testing | - |
| State of sample | Prototype unit |
| Notes | - |

1.2 Maximum Results

The maximum measured SAR values for Head configuration and Body Worn configuration are given in section 1.2.1 and 1.2.2 respectively. The device conforms to the requirements of the standard(s) when the maximum measured SAR value is less than or equal to the limit.

1.2.1 Head Configuration

| Mode | Ch / f (MHz) | Conducted power | Position | SAR limit (1g avg) | Measured SAR value (1g avg) | Result |
|----------|---------------|-----------------|------------|--------------------|-----------------------------|---------------|
| AMPS | 384 / 836.52 | 25.6 dBm | Left Cheek | 1.6 W/kg | 1.20 W/kg | PASSED |
| CDMA800 | 777 / 848.31 | 25.1 dBm | Left Cheek | 1.6 W/kg | 1.20 W/kg | PASSED |
| CDMA1900 | 600 / 1880.00 | 23.4 dBm | Left Tilt | 1.6 W/kg | 1.12 W/kg | PASSED |

1.2.2 Body Worn Configuration

| Mode | Ch / f (MHz) | Conducted power | Separation distance | SAR limit (1g avg) | Measured SAR value (1g avg) | Result |
|----------|---------------|-----------------|---------------------|--------------------|-----------------------------|---------------|
| AMPS | 991 / 824.04 | 25.8 dBm | 2.2 cm | 1.6 W/kg | 1.03 W/kg | PASSED |
| CDMA800 | 1013 / 824.70 | 25.8 dBm | 2.2 cm | 1.6 W/kg | 1.03 W/kg | PASSED |
| CDMA1900 | 25 / 1851.25 | 23.7 dBm | 2.2 cm | 1.6 W/kg | 0.50 W/kg | PASSED |

1.2.3 Maximum Drift

| | |
|-----------------------------------|----------|
| Maximum drift during measurements | -0.14 dB |
|-----------------------------------|----------|

1.2.4 Measurement Uncertainty

| | |
|--------------------------------|---------------|
| Extended Uncertainty (k=2) 95% | $\pm 29.8 \%$ |
|--------------------------------|---------------|

2. DESCRIPTION OF THE DEVICE UNDER TEST

| | |
|----------------------|-----------------------|
| Device category | Portable |
| Exposure environment | Uncontrolled exposure |

| | | | |
|-----------------------------------|-----------------|-----------------|-------------------|
| Modes and Bands of Operation | AMPS 800 | CDMA 800 | CDMA1900 |
| Modulation Mode | FM | QPSK | QPSK |
| Duty Cycle | 1 | 1 | 1 |
| Transmitter Frequency Range (MHz) | 824.04 - 848.97 | 824.73 – 848.31 | 1851.25 – 1908.75 |

2.1 Picture of the Device



2.2 Description of the Antenna

The device has an internal patch antenna.

3. TEST CONDITIONS

3.1 Temperature and Humidity

| | |
|---------------------------|------------------------|
| Period of measurement: | 16-Nov-04 to 22-Nov-04 |
| Ambient temperature (°C): | 21.0 to 23.0 |
| Ambient humidity (RH %): | 41.0 to 62.0 |

3.2 Test Signal, Frequencies, and Output Power

The device was put into operation by using call tester. Communication between the device and the call tester was established by air link.

The device output power was set to maximum power level for all tests; a fully charged battery was used for every test sequence.

In all operating bands the measurements were performed on lowest, middle and highest channels.

4. DESCRIPTION OF THE TEST EQUIPMENT

4.1 Measurement System and Components

The measurements were performed using an automated near-field scanning system, DASY4 software version 4.3, manufactured by Schmid & Partner Engineering AG (SPEAG) in Switzerland. The SAR extrapolation algorithm used in all measurements on the device was the 'worst-case extrapolation' algorithm.

The following table lists calibration dates of SPEAG components:

| Test Equipment | Serial Number | Calibration interval | Calibration expiry |
|--------------------------------|---------------|----------------------|--------------------|
| DASY4 DAE V1 | 377 | 12 months | 22-Sep-05 |
| E-field Probe ET3DV6 | 1504 | 12 months | 22-Sep-05 |
| Dipole Validation Kit, D835V2 | 486 | 24 months | 26-May-05 |
| Dipole Validation Kit, D1900V2 | 504 | 24 months | 16-Jul-05 |

Additional test equipment used in testing:

| Test Equipment | Model | Serial Number | Calibration interval | Calibration expiry |
|-------------------------|-----------------|---------------|----------------------|--------------------|
| Amplifier | AR 551G2 | 25583 | - | - |
| Dielectric Probe Kit | Agilent 85070D | US01440005 | - | - |
| Signal Generator | R&S SMT06 | 100243 | 12 months | 06-Jan-05 |
| Vector Network Analyzer | Agilent 8753ES | US39174932 | 12 months | 19-Feb-05 |
| Power Meter | Boonton 4232A | 26001 | 12 months | 08-Jun-05 |
| Power Sensor | Boonton 51015 | 31143 | 12 months | 08-Jun-05 |
| Power Sensor | Boonton 51015 | 31144 | 12 months | 08-Jun-05 |
| Call Tester | Anritsu MT8802A | 6200027497 | 12 months | 13-Oct-05 |

4.1.1 Isotropic E-field Probe SN1504

| | |
|----------------------------------|--|
| Construction | Symmetrical design with triangular core Built-in optical fiber for surface detection system Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., butyl diglycol) |
| Calibration | Calibration certificate in Appendix C |
| Frequency | 10 MHz to 3 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 3 GHz) |
| Optical Surface Detection | ± 0.2 mm repeatability in air and clear liquids over diffuse reflecting surfaces |
| Directivity | ± 0.2 dB in HSL (rotation around probe axis) ± 0.4 dB in HSL (rotation normal to probe axis) |
| Dynamic Range | 5 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB |
| Dimensions | Overall length: 330 mm Tip length: 16 mm Body diameter: 12 mm Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm |
| Application | General dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms |

4.2 Phantoms

The phantom used for all tests i.e. for both validation testing and device testing, was the twin-headed "SAM Phantom", manufactured by SPEAG. The phantom conforms to the requirements of IEEE 1528 - 2003.

Validation tests were performed using the flat section, whilst Head SAR tests used the left and right head profile sections. Body SAR testing also used the flat section between the head profiles.

The SPEAG device holder (see Section 5.1) was used to position the device in all tests whilst a tripod was used to position the validation dipoles against the flat section of phantom.

4.3 Simulating Liquids

Recommended values for the dielectric parameters of the simulating liquids are given in IEEE 1528 - 2003 and FCC Supplement C to OET Bulletin 65. All tests were carried out using liquids whose dielectric parameters were within $\pm 5\%$ of the recommended values. All tests were carried out within 24 hours of measuring the dielectric parameters.

The depth of the liquid was 15.0 ± 0.5 cm measured from the ear reference point during validation and device measurements.

4.3.1 Liquid Recipes

The following recipes were used for Head and Body liquids:

800MHz Band

| Ingredient | Head (% by weight) | Body (% by weight) |
|-----------------|-----------------------|-----------------------|
| Deionised Water | 51.07 | 65.45 |
| HEC | 0.23 | - |
| Sugar | 47.31 | 34.31 |
| Preservative | 0.24 | 0.10 |
| Salt | 1.15 | 0.62 |

1900MHz Band

| Ingredient | Head (% by weight) | Body (% by weight) |
|-----------------|-----------------------|-----------------------|
| Deionised Water | 54.88 | 69.02 |
| Butyl Diglycol | 44.91 | 30.76 |
| Salt | 0.21 | 0.22 |

4.3.2 Verification of the System

The manufacturer calibrates the probes annually. Dielectric parameters of the simulating liquids were measured every day using the dielectric probe kit and the network analyser. A SAR measurement was made following the determination of the dielectric parameters of the liquids, using the dipole validation kit. A power level of 250 mW was supplied to the dipole antenna, which was placed under the flat section of the twin SAM phantom. The validation results (dielectric parameters and SAR values) are given in the table below.

System verification, head tissue simulant

| f [MHz] | Description | SAR [W/kg], 1g | Dielectric Parameters | | Temp [°C] |
|----------------|--------------------|---------------------------|--------------------------------|----------------------------------|----------------------|
| | | | ϵ_r | σ [S/m] | |
| 835 | Reference result | 2.45 | 42.8 | 0.89 | N/A |
| | ± 10% window | 2.21 to 2.70 | | | |
| | 16-Nov-04 | 2.37 | 41.5 | 0.89 | 21.0 |
| | 17-Nov-04 | 2.39 | 41.2 | 0.90 | 20.8 |
| 1900 | Reference result | 10.2 | 40.2 | 1.46 | N/A |
| | ± 10% window | 9.18 to 11.22 | | | |
| | 18-Nov-04 | 9.39 | 38.7 | 1.46 | 20.9 |
| | | | | | |

System verification, body tissue simulant

| f [MHz] | Description | SAR [W/kg], 1g | Dielectric Parameters | | Temp [°C] |
|----------------|--------------------|---------------------------|--------------------------------|----------------------------------|----------------------|
| | | | ϵ_r | σ [S/m] | |
| 835 | Reference result | 2.47 | 55.0 | 0.98 | N/A |
| | ± 10% window | 2.22 to 2.72 | | | |
| | 17-Nov-04 | 2.51 | 53.9 | 0.95 | 21.3 |
| | 19-Nov-04 | 2.48 | 53.5 | 0.94 | 21.2 |
| 1900 | Reference result | 10.5 | 50.9 | 1.60 | N/A |
| | ± 10% window | 9.45 to 11.55 | | | |
| | 22-Nov-04 | 9.80 | 51.2 | 1.60 | 19.1 |
| | | | | | |

Plots of the Verification scans are given in Appendix A.

4.3.3 Tissue Simulants used in the Measurements

Head tissue simulant measurements

| f [MHz] | Description | Dielectric Parameters | | Temp [°C] |
|-----------|-------------------|-----------------------|----------------|--------------|
| | | ϵ_r | σ [S/m] | |
| 836.5 | Recommended value | 41.5 | 0.90 | N/A |
| | $\pm 5\%$ window | 39.4 – 43.6 | 0.86 – 0.95 | |
| | 16-Nov-04 | 41.5 | 0.90 | 21.0 |
| | 17-Nov-04 | 41.2 | 0.90 | 20.8 |
| 1880 | Recommended value | 40.0 | 1.40 | N/A |
| | $\pm 5\%$ window | 38.0 – 42.0 | 1.33 – 1.47 | |
| | 18-Nov-04 | 38.8 | 1.44 | 20.9 |

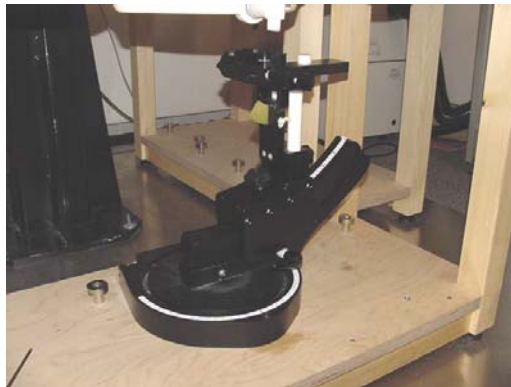
Body tissue simulant measurements

| f [MHz] | Description | Dielectric Parameters | | Temp [°C] |
|-----------|-------------------|-----------------------|----------------|--------------|
| | | ϵ_r | σ [S/m] | |
| 836.5 | Recommended value | 55.2 | 0.97 | N/A |
| | $\pm 5\%$ window | 52.4 – 58.0 | 0.92 – 1.02 | |
| | 17-Nov-04 | 53.9 | 0.95 | 21.3 |
| | 19-Nov-04 | 53.5 | 0.95 | 21.2 |
| 1880 | Recommended value | 53.3 | 1.52 | N/A |
| | $\pm 5\%$ window | 50.6 – 56.0 | 1.44 – 1.60 | |
| | 22-Nov-04 | 51.3 | 1.58 | 19.1 |

5. DESCRIPTION OF THE TEST PROCEDURE

5.1 Device Holder

The device was placed in the device holder (illustrated below) that is supplied by SPEAG as an integral part of the Dasy system.



Device holder supplied by SPEAG

A Nokia designed spacer (illustrated below) was used to position the device within the SPEAG holder. The spacer positions the device so that the holder has minimal effect on the test results but still holds the device securely. The spacer was removed before the tests.



Nokia spacer

5.2 Test Positions

5.2.1 Against Phantom Head

Measurements were made in “cheek” and “tilt” positions on both the left hand and right hand sides of the phantom.

The positions used in the measurements were according to IEEE 1528 - 2003 "IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques".

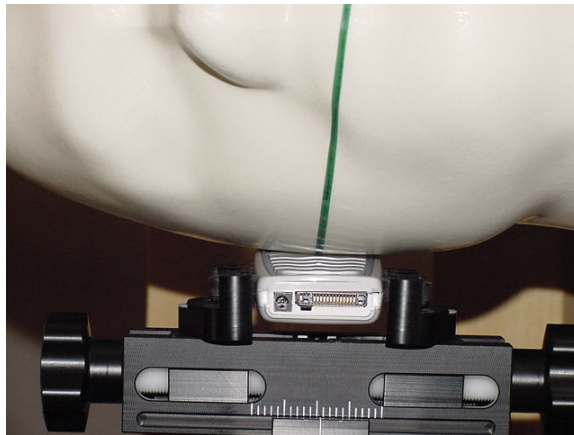


Photo of the device in “cheek” position

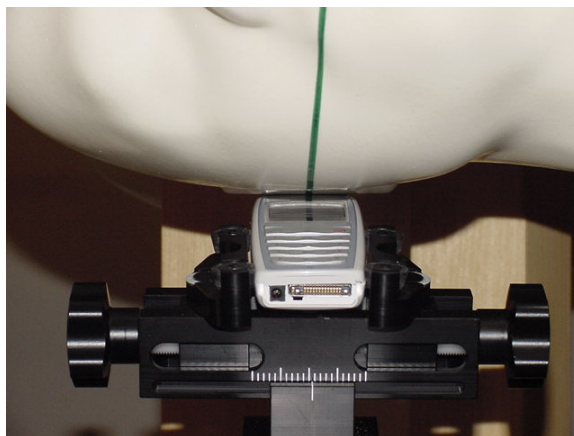


Photo of the device in “tilt” position

5.2.2 Body Worn Configuration

The device was placed in the SPEAG holder using the Nokia spacer and placed below the flat section of the phantom. The distance between the device and the phantom was kept at the separation distance indicated in the photo below using a separate flat spacer that was removed before the start of the measurements. The device was oriented with its antenna facing the phantom since this orientation gave higher results.



Photo of the device positioned for Body SAR measurement.
The spacer was removed for the tests.

5.3 Scan Procedures

First coarse scans were used for determination of the field distribution. Next a cube scan, a minimum of 5x5x7 points covering a volume of at least 32x32x30mm was performed around the highest E-field value to determine the averaged SAR value. Drift was determined by measuring the same point at the start of the coarse scan and again at the end of the cube scan.

5.4 SAR Averaging Methods

The maximum SAR value was averaged over a cube of tissue using interpolation and extrapolation.

The interpolation, extrapolation and maximum search routines within Dasy4 are all based on the modified Quadratic Shepard's method (Robert J. Renka, "Multivariate Interpolation Of Large Sets Of Scattered Data", University of North Texas ACM Transactions on Mathematical Software, vol. 14, no. 2, June 1988, pp. 139-148).

The interpolation scheme combines a least-square fitted function method with a weighted average method. A trivariate 3-D / bivariate 2-D quadratic function is computed for each measurement point and fitted to neighbouring points by a least-square method. For the cube scan, inverse distance weighting is incorporated to fit distant points more accurately. The interpolating function is finally calculated as a weighted average of the quadratics.

In the cube scan, the interpolation function is used to extrapolate the Peak SAR from the deepest measurement points to the inner surface of the phantom.

6. MEASUREMENT UNCERTAINTY

Table 6.1 – Measurement uncertainty evaluation

| Uncertainty Component | Section in IEEE 1528 | Tol. (%) | Prob Dist | Div | G_i | $G_i \cdot U_i$ (%) | V_i |
|---|----------------------|----------|-----------|-----|-----------------|---------------------|-------|
| Measurement System | | | | | | | |
| Probe Calibration | E2.1 | ±5.8 | N | 1 | 1 | ±5.8 | ∞ |
| Axial Isotropy | E2.2 | ±4.7 | R | √3 | $(1-c_p)^{1/2}$ | ±1.9 | ∞ |
| Hemispherical Isotropy | E2.2 | ±9.6 | R | √3 | $(c_p)^{1/2}$ | ±3.9 | ∞ |
| Boundary Effect | E2.3 | ±8.3 | R | √3 | 1 | ±4.8 | ∞ |
| Linearity | E2.4 | ±4.7 | R | √3 | 1 | ±2.7 | ∞ |
| System Detection Limits | E2.5 | ±1.0 | R | √3 | 1 | ±0.6 | ∞ |
| Readout Electronics | E2.6 | ±1.0 | N | 1 | 1 | ±1.0 | ∞ |
| Response Time | E2.7 | ±0.8 | R | √3 | 1 | ±0.5 | ∞ |
| Integration Time | E2.8 | ±2.6 | R | √3 | 1 | ±1.5 | ∞ |
| RF Ambient Conditions - Noise | E6.1 | ±3.0 | R | √3 | 1 | ±1.7 | ∞ |
| RF Ambient Conditions - Reflections | E6.1 | ±3.0 | R | √3 | 1 | ±1.7 | ∞ |
| Probe Positioner Mechanical Tolerance | E6.2 | ±0.4 | R | √3 | 1 | ±0.2 | ∞ |
| Probe Positioning with respect to Phantom Shell | E6.3 | ±2.9 | R | √3 | 1 | ±1.7 | ∞ |
| Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation | E5.2 | ±3.9 | R | √3 | 1 | ±2.3 | ∞ |
| Test sample Related | | | | | | | |
| Test Sample Positioning | E4.2.1 | ±6.0 | N | 1 | 1 | ±6.0 | 11 |
| Device Holder Uncertainty | E4.1.1 | ±5.0 | N | 1 | 1 | ±5.0 | 7 |
| Output Power Variation - SAR drift measurement | 6.6.3 | ±10.0 | R | √3 | 1 | ±5.8 | ∞ |
| Phantom and Tissue Parameters | | | | | | | |
| Phantom Uncertainty (shape and thickness tolerances) | E3.1 | ±4.0 | R | √3 | 1 | ±2.3 | ∞ |
| Liquid Conductivity Target - tolerance | E3.2 | ±5.0 | R | √3 | 0.64 | ±1.8 | ∞ |
| Liquid Conductivity - measurement uncertainty | E3.3 | ±5.5 | N | 1 | 0.64 | ±3.5 | 5 |
| Liquid Permittivity Target tolerance | E3.2 | ±5.0 | R | √3 | 0.6 | ±1.7 | ∞ |
| Liquid Permittivity - measurement uncertainty | E3.3 | ±2.9 | N | 1 | 0.6 | ±1.7 | 5 |
| Combined Standard Uncertainty | | | RSS | | | ±14.9 | 206 |
| Coverage Factor for 95% | | | k=2 | | | | |
| Expanded Standard Uncertainty | | | | | | ±29.8 | |

7. RESULTS

The measured Head SAR values for the test device are tabulated below:

AMPS Head SAR results

| Position | | SAR, averaged over 1g (W/kg) | | |
|-------------|-------|------------------------------|----------------------|----------------------|
| | | Ch 991 824.04 MHz | Ch 384 836.52 MHz | Ch 799 848.97 MHz |
| Power level | | 25.8 dBm | 25.6 dBm | 25.2 dBm |
| Left | Cheek | 1.09 | 1.20 | 1.09 |
| | Tilt | 0.83 | 0.90 | 0.90 |
| Right | Cheek | 1.08 | 1.15 | 1.10 |
| | Tilt | - | 0.69 | - |

CDMA800 Head SAR results

| Position | | SAR, averaged over 1g (W/kg) | | |
|-------------|-------|------------------------------|----------------------|----------------------|
| | | Ch 1013 824.70 MHz | Ch 384 836.52 MHz | Ch 777 848.31 MHz |
| Power level | | 25.8 dBm | 25.5 dBm | 25.1 dBm |
| Left | Cheek | 1.14 | 1.15 | 1.20 |
| | Tilt | 0.82 | 0.88 | 0.89 |
| Right | Cheek | 1.08 | 1.17 | 1.11 |
| | Tilt | - | 0.72 | - |

CDMA1900 Head SAR results

| Position | | SAR, averaged over 1g (W/kg) | | |
|-------------|-------|------------------------------|-----------------------|------------------------|
| | | Ch 25 1851.25 MHz | Ch 600 1880.00 MHz | Ch 1175 1908.75 MHz |
| Power level | | 23.7 dBm | 23.4 dBm | 23.1 dBm |
| Left | Cheek | 0.90 | 0.95 | 0.84 |
| | Tilt | 0.90 | 1.12 | 1.02 |
| Right | Cheek | 0.76 | 0.70 | 0.61 |
| | Tilt | 0.86 | 0.88 | 0.77 |

The measured Body SAR values for the test device are tabulated below

AMPS Body SAR results

| Body-worn location setup | SAR, averaged over 1g (W/kg) | | |
|--------------------------|------------------------------|----------------------|----------------------|
| | Ch 991 824.04 MHz | Ch 384 836.52 MHz | Ch 799 848.97 MHz |
| Power level | 25.8 dBm | 25.6 dBm | 25.2 dBm |
| Without headset | 1.03 | 0.71 | 0.62 |
| Headset HS-3 | - | 0.49 | - |

CDMA800 Body SAR results

| Body-worn location setup | SAR, averaged over 1g (W/kg) | | |
|--------------------------|------------------------------|----------------------|----------------------|
| | Ch 1013 824.70 MHz | Ch 384 836.52 MHz | Ch 777 848.31 MHz |
| Power level | 25.8 dBm | 25.5 dBm | 25.1 dBm |
| Without headset | 1.03 | 0.68 | 0.62 |
| Headset HS-3 | - | 0.43 | - |

CDMA1900 Body SAR results

| Body-worn location setup | SAR, averaged over 1g (W/kg) | | |
|--------------------------|------------------------------|-----------------------|------------------------|
| | Ch 25 1851.25 MHz | Ch 600 1880.00 MHz | Ch 1175 1908.75 MHz |
| Power level | 23.7 dBm | 23.4 dBm | 23.1 dBm |
| Without headset | 0.50 | 0.49 | 0.45 |
| Headset HS-3 | - | 0.49 | - |

Plots of the Measurement scans are given in Appendix B.