



NVLAP LAB CODE 200707-0



SAR EVALUATION REPORT

For

Cellon Communications Technology (ShenZhen) Co., Ltd.

13/F, Skyworth C Building, Gaoxin S.Ave1, Hi-Tech Industrial Park,

Nanshan, Shenzhen, Guangdong, China 518057

FCC ID: T38UT2011

Report Type: Original Report	Product Type: GSM Mobile Phone
Test Engineer: <u>Chris Peng</u> <i>Chris. Peng</i>	
Report Number: <u>RSZ10021005-SAR</u>	
Report Date: <u>2010-02-25</u>	
William Chen Reviewed By: <u>EMC Engineer</u> <i>William . chan .</i>	
Prepared By: Bay Area Compliance Laboratories Corp. (Shenzhen) 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China Tel: +86-755-33320018 Fax: +86-755-33320008	

Note: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. (Shenzhen). This report **must not** be used by the customer to claim product certification, approval, or endorsement by NVLAP*, NIST, or any agency of the Federal Government.

* This report may contain data that are not covered by the NVLAP accreditation and are marked with an asterisk "*" (Rev.2)

Summary of Test Results

Rule Part(s):	FCC 47 §2.1093
Test Procedure(s):	FCC OET Bulletin 65-C IEEE 1528-2003
Device Type:	Portable Device
Exposure Category	Population/Uncontrolled
Modulation:	GMSK
TX Frequency Range:	824-849 MHz (Cellular Band) 1850-1910 MHz (PCS Band)
Maximum Conducted Power Tested:	GPRS: 32.40 dBm (Cellular Band) GSM: 29.52 dBm (PCS Band)
Antenna Type(s):	Internal Antenna
Body-Worn Accessories:	Headset
Face-Head Accessories:	None
Max. SAR Level(s) Measured:	0.700 W/Kg 1g Head Tissue (Cellular Band) 0.386 W/Kg 1g Body Tissue (Cellular Band) 0.661 W/Kg 1g Head Tissue (PCS Band) 0.168 W/Kg 1g Body Tissue (PCS Band)

This wireless device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled Exposure limits specified in ANSI/IEEE Standards and has been tested in accordance with the measurement procedures specified in FCC OET 65 Supplement C and IEEE 1528-2003.

The results and statements contained in this report pertain only to the device(s) evaluated.



EUT Photo

TABLE OF CONTENTS

REFERENCE, STANDARDS AND GUILDELINES	4
SAR LIMITS	5
EUT DESCRIPTION	6
TECHNICAL SPECIFICATION	6
EUT PHOTO	6
FACILITIES AND ACCREDITATION	7
DESCRIPTION OF TEST SYSTEM	8
EQUIPMENT LIST AND CALIBRATION	15
EQUIPMENTS LIST & CALIBRATION INFO	15
SAR MEASUREMENT SYSTEM VERIFICATION	16
LIQUID VERIFICATION	16
SYSTEM ACCURACY VERIFICATION	19
EUT TEST STRATEGY AND METHODOLOGY	20
TEST POSITIONS FOR DEVICE OPERATING NEXT TO A PERSON'S EAR	20
CHEEK/TOUCH POSITION	21
EAR/TILT POSITION	21
TEST POSITIONS FOR BODY-WORN AND OTHER CONFIGURATIONS	22
SAR EVALUATION PROCEDURE	23
SAR MEASUREMENT RESULTS	24
SAR TEST DATA	24
APPENDIX A – MEASUREMENT UNCERTAINTY	25
APPENDIX B – PROBE CALIBRATION CERTIFICATES	26
APPENDIX C – DIPOLE CALIBRATION CERTIFICATES	66
APPENDIX D – SAR SYSTEM VALIDATION DATA	86
APPENDIX E – EUT SCAN RESULTS	90
APPENDIX F – CONDUCTED OUTPUT POWER MEASUREMENT	100
TEST PROCEDURE	100
TEST EQUIPMENT LIST AND DETAILS	100
TEST RESULTS	100
APPENDIX G – EUT TEST POSITION PHOTOS	101
LEFT HEAD TOUCH SETUP PHOTO	101
LEFT HEAD TILT SETUP PHOTO	101
RIGHT HEAD TOUCH SETUP PHOTO	102
RIGHT HEAD TILT SETUP PHOTO	102
BODY-WORN BACK SETUP PHOTO	103
APPENDIX H – EUT PHOTOS	104
EUT - TOP VIEW	104
EUT - BOTTOM VIEW	104
EUT- UNCOVER VIEW	105
EUT – SIDE VIEW	105
EUT - HEADSET	106
APPENDIX I - INFORMATIVE REFERENCES	107
APPENDIX J - PRODUCT SIMILAR DECLARATION LETTER	108

REFERENCE, STANDARDS AND GUILDELINEs

FCC:

The Report and Order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). According to the Supplement C of OET Bulletin 65 "Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in North America is 1.6 mW/g average over 1 gram of tissue mass.

CE:

The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 2 mW/g as recommended by the EN50360 for an uncontrolled environment. According to the Standard, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in Europe is 2 mW/g average over 10 gram of tissue mass.

The test configurations were laid out on a specially designed test fixture to ensure the reproducibility of measurements. Each configuration was scanned for SAR. Analysis of each scan was carried out to characterize the above effects in the device.

SAR Limits

FCC Limit (1g Tissue)

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	1.60	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

CE Limit (10g Tissue)

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	2.0	10
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

EUT DESCRIPTION

This Bay Area Compliance Laboratories Corp. test report has been prepared on behalf of Cellon Communications Technology (Shenzhen) Co., Ltd., and their product, Model: C2011,GPFM1238MT, GPFM1238TG,GPFM1238EN,GPFM1238ENR,GPFM1238ENL,GPFM1238CL,GPFE1238CA,GPFE1238MT,GPFE1238TG,GPFE1238EN,GPFE1238ENR,GPFE1238ENL,GPFE1238CL,GPFE1238C W,GPFE1238CWJ, FCC ID: T38UT2011 or the EUT (Equipment Under Test) as referred to in the rest of this report.

*Note: The series products, model : C2011,GPFM1238MT, GPFM1238TG, GPFM1238EN, GPFM1238ENR,GPFM1238ENL,GPFM1238CL,GPFE1238CA,GPFE1238MT,GPFE1238TG,GPFE1238EN, GPFE1238ENR,GPFE1238ENL,GPFE1238CL,GPFE1238CW,GPFE1238CWJ, we select C2011 to test, there is no electrical change has been made to the equipment, which was explained in the Appendix J Product Similar Declaration Letter.

Technical Specification

Item	Content
Modulation	GMSK
Frequency Band	Cellular Band: 824-849 MHz 869-894 MHz PCS Band: 1850-1910 MHz 1930-1990 MHz
Dimensions (L*W*H)	98mm (L)× 42mm (W)×13 mm (H)
Weight	60 g
Power Source	3.7 VDC/ 550mAh Rechargeable Battery
Normal Operation	Head and Body-worn

EUT Photo



Model:C2011
Please refer to Appendix H

FACILITIES AND ACCREDITATION

The test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect data is located at 6/F, the 3rd Phase of WanLi Industrial Building, Shi Hua Road, Fu Tian Free Trade Zone, Shenzhen, Guangdong, P.R. of China

Additionally, Bay Area Compliance Laboratories Corp. (Shenzhen) is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (Lab Code 200707-0).



The current scope of accreditations can be found at <http://ts.nist.gov/Standards/scopes/2007070.htm>

DESCRIPTION OF TEST SYSTEM

These measurements were performed with ALSAS 10 Universal Integrated SAR Measurement system from APREL Laboratories.



ALSAS-10U System Description

ALSAS-10-U is fully compliant with the technical and scientific requirements of IEEE 1528, IEC 62209, CENELEC, ARIB, ACA, and the Federal Communications Commission. The system comprises of a six axes articulated robot which utilizes a dedicated controller. ALSAS-10U uses the latest methodologies. And FDTD modeling to provide a platform which is repeatable with minimum uncertainty.

Applications

Predefined measurement procedures compliant with the guidelines of CENELEC, IEEE, IEC, FCC, etc are utilized during the assessment for the device. Automatic detection for all SAR maxima are embedded within the core architecture for the system, ensuring that peak locations used for centering the zoom scan are within a 1mm resolution and a 0.05mm repeatable position. System operation range currently available up-to 6 GHz in simulated tissue.

Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the ALSAS-10U software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10mm, with the side length of the 10 g cube 21.5mm.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of 5x5x8 (8mmx8mmx5mm) providing a volume of 32mm in the X & Y axis, and 35mm in the Z axis.

ALSAS-10U Interpolation and Extrapolation Uncertainty

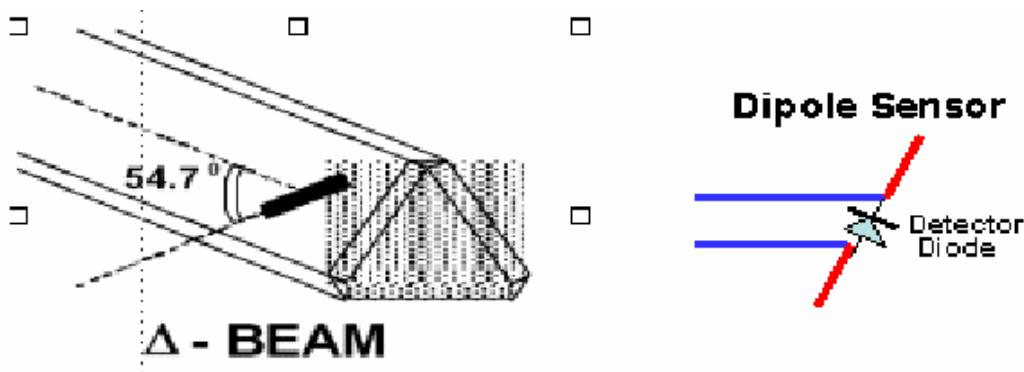
The overall uncertainty for the methodology and algorithms used during the SAR calculation was evaluated using the data from IEEE 1528 based on the example f3 algorithm:

$$f_3(x, y, z) = A \frac{a^2}{\frac{a^2}{4} + x'^2 + y'^2} \cdot \left(e^{-\frac{2z}{a}} + \frac{a^2}{2(a + 2z)^2} \right)$$

Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



SAR is assessed with a calibrated probe which moves at a default height of 5mm from the center of the diode, which is mounted to the sensor, to the phantom surface (in the Z Axis). The 5mm offset height has been selected so as to minimize any resultant boundary effect due to the probe being in close proximity to the phantom surface.

The following algorithm is an example of the function used by the system for linearization of the output from the probe when measuring complex modulation schemes.

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

Isotropic E-Field Probe Specification

Calibration in Air	Frequency Dependent Below 2 GHz Calibration in air performed in a TEM Cell Above 2 GHz Calibration in air performed in waveguide
Sensitivity	0.70 $\mu\text{V}/(\text{V}/\text{m})^2$ to 0.85 $\mu\text{V}/(\text{V}/\text{m})^2$
Dynamic Range	0.0005 W/kg to 100 W/kg
Isotropic Response	Better than 0.2 dB
Diode Compression Point (DCP)	Calibration for Specific Frequency
Probe Tip Radius	< 5 mm
Sensor Offset	1.56 (+/- 0.02 mm)
Probe Length	290 mm
Video Bandwidth	@ 500 Hz: 1 dB @ 1.02 kHz: 3 dB
Boundary Effect	Less than 2% for distance greater than 2.4 mm
Spatial Resolution	Diameter less than 5 mm Compliant with Standards

Boundary Detection Unit and Probe Mounting Device

ALSAS-10U incorporates a boundary detection unit with a sensitivity of 0.05mm for detecting all types of surfaces. The robust design allows for detection during probe tilt (probe normalize) exercises, and utilizes a second stage emergency stop. The signal electronics are fed directly into the robot controller for high accuracy surface detection in lateral and axial detection modes (X, Y, & Z).

The probe is mounted directly onto the Boundary Detection unit for accurate tooling and displacement calculations controlled by the robot kinematics. The probe is connect to an isolated probe interconnect where the output stage of the probe is fed directly into the amplifier stage of the Daq-Paq.

Daq-Paq (Analog to Digital Electronics)

ALSAS-10U incorporates a fully calibrated Daq-Paq (analog to digital conversion system) which has a 4 channel input stage, sent via a 2 stage auto-set amplifier module. The input signal is amplified accordingly so as to offer a dynamic range from 5 μV to 800mV. Integration of the fields measured is carried out at board level utilizing a Co-Processor which then sends the measured fields down into the main computational module in digitized form via an RS232 communications port. Probe linearity and duty cycle compensation is carried out within the main Daq-Paq module.

ADC	12 Bit
Amplifier Range	20 mV to 200 mV and 150 mV to 800 mV
Field Integration	Local Co-Processor utilizing proprietary integration algorithms
Number of Input Channels	4 in total 3 dedicated and 1 spare
Communication	Packet data via RS232

Axis Articulated Robot

ALSAS-10U utilizes a six axis articulated robot, which is controlled using a Pentium based real-time movement controller. The movement kinematics engine utilizes proprietary (Thermo CRS) interpolation and extrapolation algorithms, which allow full freedom of movement for each of the six joints within the working envelope. Utilization of joint 6 allows for full probe rotation with a tolerance better than 0.05mm around the central axis.



Robot/Controller Manufacturer	Thermo CRS
Number of Axis	Six independently controlled axis
Positioning Repeatability	0.05 mm
Controller Type	Single phase Pentium based C500C
Robot Reach	710 mm
Communication	RS232 and LAN compatible

ALSAS Universal Workstation

ALSAS Universal workstation allows for repeatability and fast adaptability. It allows users to do calibration, testing and measurements using different types of phantoms with one set up, which significantly speeds up the measurement process.

Universal Device Positioner

The universal device positioner allows complete freedom of movement of the EUT. Developed to hold a EUT in a free-space scenario any additional loading attributable to the material used in the construction of the positioner has been eliminated. Repeatability has been enhanced through the linear scales which form the design used to indicate positioning for any given test scenario in all major axes. A 15° tilt indicator is included for the aid of cheek to tilt movements for head SAR analysis. Overall uncertainty for measurements have been reduced due to the design of the Universal device positioner, which allows positioning of a device in as near to a free-space scenario as possible, and by providing the means for complete repeatability.

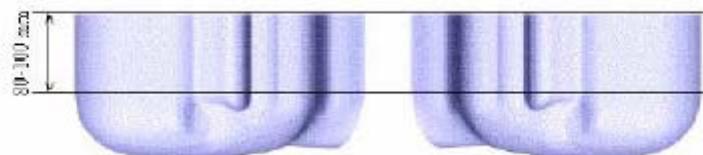


Phantom Types

The ALSAS-10U allows the integration of multiple phantom types. SAM Phantoms fully compliant with IEEE 1528, Universal Phantom, and Universal Flat.

APREL SAM Phantoms

The SAM phantoms developed using the IEEE SAM CAD file. They are fully compliant with the requirements for both IEEE 1528 and FCC Supplement C. Both the left and right SAM phantoms are interchangeable, transparent and include the IEEE 1528 grid with visible NF and MB lines.



APREL Laboratories Universal Phantom

The Universal Phantom is used on the ALSAS-10U as a system validation phantom. The Universal Phantom has been fully validated both experimentally from 800MHz to 6GHz and numerically using XFDTD numerical software.

The shell thickness is 2mm overall, with a 4mm spacer located at the NF/MB intersection providing an overall thickness of 6mm in line with the requirements of IEEE-1528.

The design allows for fast and accurate measurements, of handsets, by allowing the conservative SAR to be evaluated at on frequency for both left and right head experiments in one measurement.



Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 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 described in Reference [12] and extrapolated according to the head parameters specified in P1528.

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

IEEE SCC-34/SC-2 P1528 Recommended Tissue Dielectric Parameters

Frequency (MHz)	Head Tissue		Body Tissue	
	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

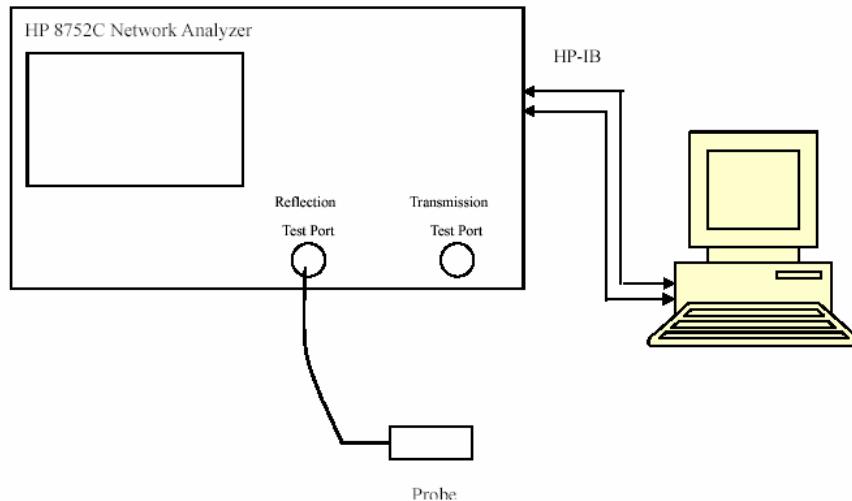
EQUIPMENT LIST AND CALIBRATION

Equipments List & Calibration Info

Equipment	Model	Calibration Due Date	S/N:
CRS F3 robot	ALS-F3	N/A	RAF0805352
CRS F3 Software	ALS-F3-SW	N/A	N/A
CRS C500C controller	ALS-C500	N/A	RCF0805379
Probe mounting device & Boundary Detection Sensor System	ALS-PMDPS-3	N/A	120-00270
Universal Work Station	ALS-UWS	N/A	100-00157
Data Acquisition Package	ALS-DAQ-PAQ-3	N/A	110-00212
Miniature E-Field Probe	ALS-E-020	2010-09-05	273
Dipole, 835 MHz	ALS-D-835-S-2	2010-09-01	180-00558
Dipole, 1900 MHz	ALS-D-1900-S-2	2010-09-01	210-00710
Dipole Spacer	ALS-DS-U	N/A	250-00907
R&S, universal Communication Tester	CMD200	2010-09-26	1100.0008.02
Device holder/Positioner	ALS-H-E-SET-2	N/A	170-00510
Left ear SAM phantom	ALS-P-SAM-L	N/A	130-00311
Right ear SAM phantom	ALS-P-SAM-R	N/A	140-00359
UniPhantom	ALS-P-UP-1	N/A	150-00413
Simulated Tissue 835 MHz Head	ALS-T-835-1-H	Each Time	270-01002
Simulated Tissue 835 MHz Body	ALS-T-835-1-B	Each Time	270-02101
Simulated Tissue 1900 MHz Head	ALS-T-1900-1-H	Each Time	295-01103
Simulated Tissue 1900 MHz Body	ALS-T-1900-1-B	Each Time	295-02102
Signal Generator	HP8648C	2010-04-28	3426A01345
Power Amplifier	5S1G4	N/A	71377
Spectrum Analyzer	FSEM30	2010-07-08	849720/019

SAR MEASUREMENT SYSTEM VERIFICATION

Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Result
		ϵ_r	σ (S/m)	
835	Head	41.24	0.90	In Tolerance
835	Body	55.41	0.98	In Tolerance
1900	Head	40.27	1.41	In Tolerance
1900	Body	53.99	1.49	In Tolerance

* Verification was performed on 2010-02-22.

Please refer to the following tables

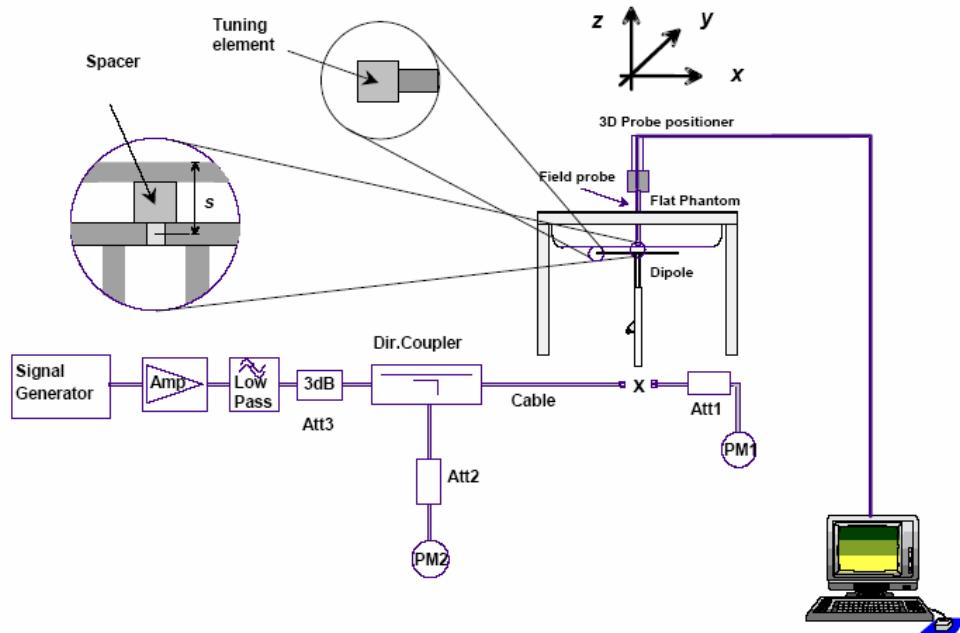
835 MHz Head				835 MHz Body		
Frequency	e'	e''		Frequency	e'	e''
824000000	41.275039	19.511108		824000000	55.437422	21.359774
824500000	41.243947	19.501858		824500000	55.411128	21.368391
825000000	41.227253	19.467483		825000000	55.399641	21.371513
825500000	41.121901	19.457464		825500000	55.336024	21.399584
826000000	41.140296	19.434807		826000000	55.320594	21.331625
826500000	41.162233	19.405931		826500000	55.408288	21.375975
827000000	41.138672	19.442394		827000000	55.431193	21.366293
827500000	41.186089	19.448740		827500000	55.444298	21.360214
828000000	41.205734	19.431027		828000000	55.390317	21.323548
828500000	41.212174	19.404802		828500000	55.385131	21.282276
829000000	41.263208	19.420355		829000000	55.404370	21.220481
829500000	41.211597	19.411691		829500000	55.418734	21.247226
830000000	41.248038	19.378691		830000000	55.464702	21.239839
830500000	41.207986	19.335401		830500000	55.389129	21.233743
831000000	41.180930	19.414588		831000000	55.350110	21.236088
831500000	41.200524	19.396798		831500000	55.405876	21.313549
832000000	41.162265	19.321722		832000000	55.367949	21.171682
832500000	41.137035	19.368824		832500000	55.332803	21.183733
833000000	41.177656	19.313867		833000000	55.372647	21.189591
833500000	41.209139	19.376493		833500000	55.451877	21.241206
834000000	41.206559	19.354469		834000000	55.399554	21.149456
834500000	41.205136	19.373898		834500000	55.443638	21.181079
835000000	41.237015	19.363118		835000000	55.415303	21.196083
835500000	41.264017	19.353683		835500000	55.447036	21.166223
836000000	41.194624	19.334821		836000000	55.386341	21.182539
836500000	41.189626	19.396794		836500000	55.391994	21.228545
837000000	41.206396	19.369405		837000000	55.406125	21.166949
837500000	41.200592	19.317233		837500000	55.493271	21.181757
838000000	41.223810	19.386694		838000000	55.471114	21.183418
838500000	41.182258	19.355016		838500000	55.431713	21.197132
839000000	41.172168	19.361165		839000000	55.385794	21.207874
839500000	41.174643	19.301670		839500000	55.446749	21.183152
840000000	41.185733	19.327735		840000000	55.411999	21.151416
840500000	41.175072	19.313399		840500000	55.419751	21.130710
841000000	41.158311	19.295652		841000000	55.394223	21.122832
841500000	41.187813	19.331888		841500000	55.441445	21.119681
842000000	41.189518	19.288313		842000000	55.395562	21.157832
842500000	41.193222	19.269975		842500000	55.444903	21.131974
843000000	41.187305	19.326423		843000000	55.420591	21.112812
843500000	41.110853	19.315437		843500000	55.398582	21.141689
844000000	41.187260	19.281570		844000000	55.376182	21.127244
844500000	41.141458	19.323588		844500000	55.372123	21.160029
845000000	41.067326	19.301815		845000000	55.357722	21.109976
845500000	41.082659	19.305866		845500000	55.376822	21.090372
846000000	41.037150	19.276080		846000000	55.305415	21.116747
846500000	41.078172	19.262580		846500000	55.376763	21.120142
847000000	41.058401	19.286887		847000000	55.403647	21.065039
847500000	41.061592	19.284166		847500000	55.392464	21.078843
848000000	41.035140	19.249125		848000000	55.342203	21.075453
848500000	41.039745	19.286803		848500000	55.340471	21.085543
849000000	40.999932	19.276041		849000000	55.381901	21.067978

1900 MHz Head				1900 MHz Body		
Frequency	e'	e''		Frequency	e'	e''
1850000000	40.391281	13.637132		1850000000	53.894847	14.377805
1851200000	40.405813	13.632217		1851200000	53.881425	14.399782
1852400000	40.402719	13.604090		1852400000	53.905702	14.380422
1853600000	40.337331	13.580739		1853600000	53.855263	14.323640
1854800000	40.327292	13.591154		1854800000	53.872324	14.366781
1856000000	40.339602	13.612496		1856000000	53.857327	14.382752
1857200000	40.364730	13.594740		1857200000	53.867347	14.335096
1858400000	40.348063	13.609390		1858400000	53.862432	14.386892
1859600000	40.324103	13.597522		1859600000	53.864796	14.372259
1860800000	40.334727	13.576409		1860800000	53.898184	14.367037
1862000000	40.314462	13.565417		1862000000	53.885751	14.335959
1863200000	40.318458	13.573291		1863200000	53.887712	14.370290
1864400000	40.319027	13.546131		1864400000	53.862719	14.354262
1865600000	40.279343	13.528821		1865600000	53.910763	14.369241
1866800000	40.257245	13.534514		1866800000	53.879872	14.354939
1868000000	40.289274	13.527851		1868000000	53.862223	14.350973
1869200000	40.279206	13.547719		1869200000	53.932217	14.398247
1870400000	40.268953	13.518156		1870400000	53.903944	14.411526
1871600000	40.267304	13.551244		1871600000	53.929658	14.401745
1872800000	40.284971	13.565952		1872800000	53.942426	14.418794
1874000000	40.292424	13.584016		1874000000	53.933059	14.448490
1875200000	40.280333	13.571104		1875200000	53.955048	14.434566
1876400000	40.262707	13.415692		1876400000	53.959189	14.278317
1877600000	40.264469	13.400197		1877600000	53.956884	14.282829
1878800000	40.259793	13.413537		1878800000	53.996890	14.304821
1880000000	40.271872	13.453347		1880000000	54.021289	14.281154
1881200000	40.236606	13.442774		1881200000	53.991463	14.337199
1882400000	40.241163	13.465675		1882400000	53.984428	14.315980
1883600000	40.256800	13.447592		1883600000	54.001614	14.325098
1884800000	40.272414	13.463502		1884800000	54.042183	14.335202
1886000000	40.258207	13.485971		1886000000	54.029076	14.368462
1887200000	40.249244	13.468023		1887200000	54.043455	14.350040
1888400000	40.238107	13.485446		1888400000	54.020329	14.343767
1889600000	40.218190	13.474497		1889600000	54.017446	14.367533
1890800000	40.213486	13.440752		1890800000	54.002723	14.323586
1892000000	40.213582	13.433017		1892000000	54.035720	14.286542
1893200000	40.178155	13.450031		1893200000	54.039285	14.339631
1894400000	40.188650	13.438280		1894400000	54.007621	14.303804
1895600000	40.194995	13.412545		1895600000	53.997113	14.251956
1896800000	40.168186	13.390684		1896800000	53.977220	14.265254
1898000000	40.148243	13.389104		1898000000	53.976355	14.290927
1899200000	40.134654	13.358884		1899200000	54.009217	14.247837
1900400000	40.151780	13.376774		1900400000	53.982029	14.253087
1901600000	40.168033	13.364455		1901600000	53.997904	14.248198
1902800000	40.160897	13.373235		1902800000	53.994550	14.238762
1904000000	40.159690	13.372045		1904000000	53.989817	14.268081
1905200000	40.145420	13.349228		1905200000	53.975771	14.201064
1906400000	40.165858	13.343392		1906400000	53.951246	14.188884
1907600000	40.168103	13.332310		1907600000	53.975041	14.160336
1908800000	40.166606	13.249747		1908800000	53.941984	14.071194
1910000000	40.216089	13.265160		1910000000	53.955353	14.083570

System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of $\pm 10\%$. The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

System Verification Setup Block Diagram



System Accuracy Check Results

Frequency (MHz)	1 g SAR (W/Kg)	10 g SAR (W/Kg)	Result
835	9.427	6.113	In Tolerance
1900	40.263	20.483	In Tolerance

* System Check was performed on 2010-02-22.

* All SAR values are normalized to 1 Watt forward power.

IEEE P1528 recommended reference value for Head Tissue

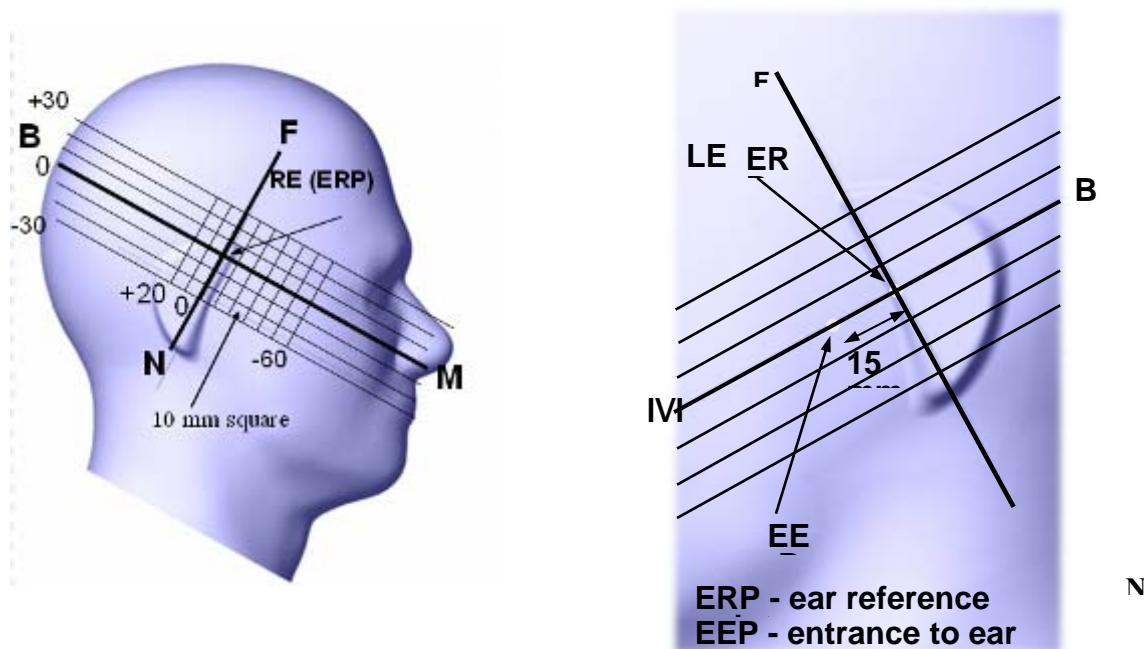
Frequency (MHz)	1 g SAR (W/Kg)	10 g SAR (W/Kg)	Local SAR at surface (above feed point)	Local SAR at surface (v=2cm offset from feed point)
300	3.0	2.0	4.4	2.1
450	4.9	3.3	7.2	3.2
835	9.5	6.2	14.1	4.9
900	10.8	6.9	16.4	5.4
1450	29.0	16.0	50.2	6.5
1800	38.1	19.8	69.5	6.8
1900	39.7	20.5	72.1	6.6
2000	41.1	21.1	74.6	6.5
2450	52.4	24.0	104.2	7.7
3000	63.8	25.7	140.2	9.5

EUT TEST STRATEGY AND METHODOLOGY

Test Positions for Device Operating Next to a Person's Ear

This category includes most wireless handsets with fixed, retractable or internal antennas located toward the top half of the device, with or without a foldout, sliding or similar keypad cover. The handset should have its earpiece located within the upper $\frac{1}{4}$ of the device, either along the centerline or off-centered, as perceived by its users. This type of handset should be positioned in a normal operating position with the “test device reference point” located along the “vertical centerline” on the front of the device aligned to the “ear reference point”. The “test device reference point” should be located at the same level as the center of the earpiece region. The “vertical centerline” should bisect the front surface of the handset at its top and bottom edges. A “ear reference point” is located on the outer surface of the head phantom on each ear spacer. It is located 1.5 cm above the center of the ear canal entrance in the “phantom reference plane” defined by the three lines joining the center of each “ear reference point” (left and right) and the tip of the mouth.

A handset should be initially positioned with the earpiece region pressed against the ear spacer of a head phantom. For the SCC-34/SC-2 head phantom, the device should be positioned parallel to the “N-F” line defined along the base of the ear spacer that contains the “ear reference point”. For interim head phantoms, the device should be positioned parallel to the cheek for maximum RF energy coupling. The “test device reference point” is aligned to the “ear reference point” on the head phantom and the “vertical centerline” is aligned to the “phantom reference plane”. This is called the “initial ear position”. While maintaining these three alignments, the body of the handset is gradually adjusted to each of the following positions for evaluating SAR:



Cheek/Touch Position

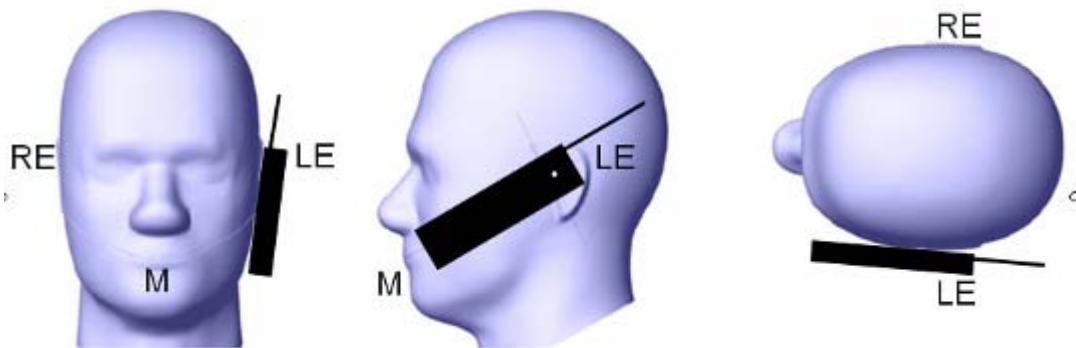
The device is brought toward the mouth of the head phantom by pivoting against the “ear reference point” or along the “N-F” line for the SCC-34/SC-2 head phantom.

This test position is established:

- When any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom.
- (or) When any portion of a foldout, sliding or similar keypad cover opened to its intended self-adjusting normal use position is in contact with the cheek or mouth of the phantom.

For existing head phantoms – when the handset loses contact with the phantom at the pivoting point, rotation should continue until the device touches the cheek of the phantom or breaks its last contact from the ear spacer.

Cheek /Touch Position



Ear/Tilt Position

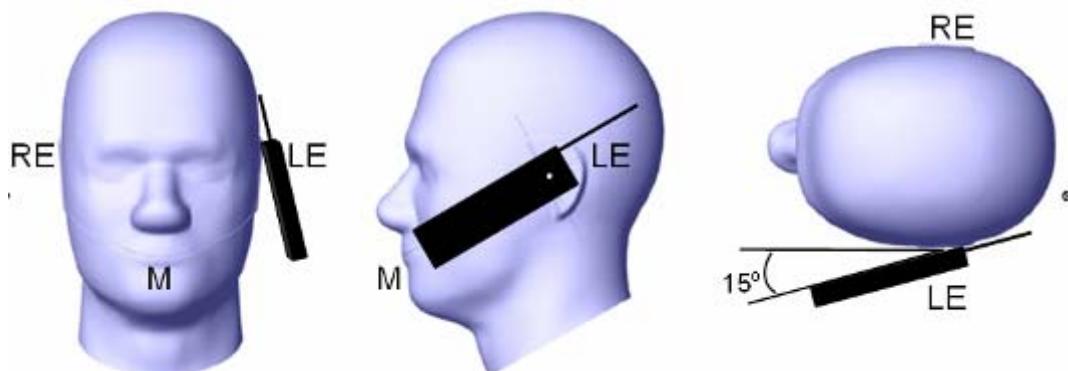
With the handset aligned in the “Cheek/Touch Position”:

1) If the earpiece of the handset is not in full contact with the phantom’s ear spacer (in the “Cheek/Touch position”) and the peak SAR location for the “Cheek/Touch” position is located at the ear spacer region or corresponds to the earpiece region of the handset, the device should be returned to the “initial ear position” by rotating it away from the mouth until the earpiece is in full contact with the ear spacer.

2) (otherwise) The handset should be moved (translated) away from the cheek perpendicular to the line passes through both “ear reference points” (note: one of these ear reference points may not physically exist on a split head model) for approximate 2-3 cm. While it is in this position, the device handset is tilted away from the mouth with respect to the “test device reference point” until the inside angle between the vertical centerline on the front surface of the phone and the horizontal line passing through the ear reference point is by 15°. After the tilt, it is then moved (translated) back toward the head perpendicular to the line passes through both “ear reference points” until the device touches the phantom or the ear spacer. If the antenna touches the head first, the positioning process should be repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously. This test position may require a device holder or positioner to achieve the translation and tilting with acceptable positioning repeatability.

If a device is also designed to transmit with its keypad cover closed for operating in the head position, such positions should also be considered in the SAR evaluation. The device should be tested on the left and right side of the head phantom in the “Cheek/Touch” and “Ear/Tilt” positions. When applicable, each configuration should be tested with the antenna in its fully extended and fully retracted positions. These test configurations should be tested at the high, middle and low frequency channels of each operating mode; for example, AMPS, CDMA, and TDMA. If the SAR measured at the middle channel for each test configuration (left, right, Cheek/Touch, Ear/Ear, extended and retracted) is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

Ear /Tilt 15° Position



Test positions for body-worn and other configurations

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations. Devices with a headset output should be tested with a headset connected to the device. When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., the same metallic belt-clip used with different holsters with no other metallic components), only the accessory that dictates the closest spacing to the body must be tested.

Body-worn accessories may not always be supplied or available as options for some devices that are intended to be authorized for body-worn use. A separation distance of 1.5 cm between the back of the device and a flat phantom is recommended for testing body-worn SAR compliance under such circumstances. Other separation distances may be used, but they should 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.

SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or EUT and the horizontal grid spacing was 15 mm x 15 mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 30 mm x 30 mm x 21 mm was assessed by measuring 5 x 5 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

- 1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
- 2) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the "Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the averages.

All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation. The plots with the corresponding SAR distributions, which reveal information about the location of the maximum SAR with respect to the device, could be found in Appendix E.

SAR Test Data

Environmental Conditions

Temperature:	22° C
Relative Humidity:	51%
ATM Pressure:	1005 mbar

* Testing was performed by Chris on 2010.02.24

Cellular Band:

EUT Position	Frequency (MHz)	Test Type	Test Mode	Antenna Type	Liquid	Phantom	Accessories	1g SAR Value (W/Kg)	FCC Limit (W/Kg)	Ref. Plot #
Left Head Cheek	824.2	Head	GSM	Integral	Head	Left Head	-	0.700	1.6	1
Left Head Tilt	824.2	Head	GSM	Integral	Head	Left Head	-	0.450	1.6	2
Right Head Cheek	824.2	Head	GSM	Integral	Head	Right Head	-	0.695	1.6	3
Right Head Tilt	824.2	Head	GSM	Integral	Head	Right Head	-	0.493	1.6	4
Body-Worn Front	824.2	Body	GPRS	Integral	Body	Flat	Headset	0.386	1.6	5

PCS Band:

EUT Position	Frequency (MHz)	Test Type	Test Mode	Antenna Type	Liquid	Phantom	Accessories	1g SAR Value (W/Kg)	FCC Limit (W/Kg)	Ref. Plot #
Left Head Cheek	1850.2	Head	GSM	Integral	Head	Left Head	-	0.661	1.6	6
Left Head Tilt	1850.2	Head	GSM	Integral	Head	Left Head	-	0.425	1.6	7
Right Head Cheek	1850.2	Head	GSM	Integral	Head	Right Head	-	0.635	1.6	8
Right Head Tilt	1850.2	Head	GSM	Integral	Head	Right Head	-	0.476	1.6	9
Body-Worn Back	1850.2	Body	GPRS	Integral	Body	Flat	Headset	0.168	1.6	10

APPENDIX A – MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

Exposure Assessment Measurement Uncertainty

Source of Uncertainty	Tolerance Value	Probability Distribution	Divisor	$c_i^1 (1-g)$	$c_i^1 (10-g)$	Standard Uncertainty (1-g) %	Standard Uncertainty (10-g) %
Measurement System							
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	$(1-cp)^{1/2}$	$(1-cp)^{1/2}$	1.5	1.5
Hemispherical Isotropy	10.9	rectangular	$\sqrt{3}$	\sqrt{cp}	\sqrt{cp}	4.4	4.4
Boundary Effect	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	rectangular	$\sqrt{3}$	1	1	2.7	2.7
Detection Limit	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Readout Electronics	1.0	normal	1	1	1	1.0	1.0
Response Time	0.8	rectangular	$\sqrt{3}$	1	1	0.5	0.5
Integration Time	1.7	rectangular	$\sqrt{3}$	1	1	1.0	1.0
RF Ambient Condition	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech.	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
Restriction							
Probe Positioning with respect to Phantom Shell	2.9	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Extrapolation and Integration	3.7	rectangular	$\sqrt{3}$	1	1	2.1	2.1
Test Sample Positioning	4.0	normal	1	1	1	4.0	4.0
Device Holder Uncertainty	2.0	normal	1	1	1	2.0	2.0
Drift of Output Power	3.2	rectangular	$\sqrt{3}$	1	1	1.8	1.8
Phantom and Setup							
Phantom Uncertainty(shape & thickness tolerance)	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
Liquid Conductivity(target)	5.0	rectangular	$\sqrt{3}$	0.7	0.5	2.0	1.4
Liquid Conductivity(meas.)	0.0	normal	1	0.7	0.5	0.0	0.0
Liquid Permittivity(target)	5.0	rectangular	$\sqrt{3}$	0.6	0.5	1.7	1.4
Liquid Permittivity(meas.)	0.0	normal	1	0.6	0.5	0.0	0.0
Combined Uncertainty		RSS				9.4	9.2
Combined Uncertainty (coverage factor=2)		Normal (k=2)				18.8	18.5

APPENDIX B – PROBE CALIBRATION CERTIFICATES**NCL CALIBRATION LABORATORIES**

Calibration File No.: CP-1013

Client.: BACL

C E R T I F I C A T E O F C A L I B R A T I O N

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe 835 MHz

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 273

Calibration in Head Tissue

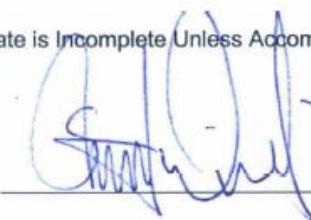
Calibration Procedure: SSI/DRB-TP-D01-032-E020-V2

Project No: BACB-E field probe-cal-5476

Calibrated: 5th September 2009
Released on: 9th September 2009

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: _____

**NCL CALIBRATION LABORATORIES**

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4161

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report reproduces the results of the calibration performed in line with the SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure. The results contained within this report are for APREL E-Field Probe E-020 273.

References

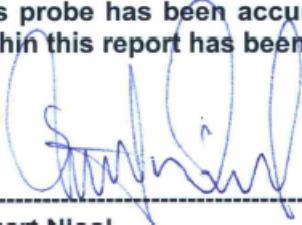
SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"
SSI-TP-011 Tissue Calibration Procedure

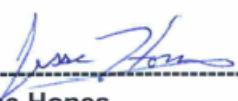
Conditions

Probe 273 was a re-calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this probe has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol

Jesse Hones

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

Probe Type:	E-Field Probe E-020
Serial Number:	273
Frequency:	835 MHz
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte*
Tip Diameter:	<5 mm
Tip Length:	60 mm
Total Length:	290 mm

*Resistive to recommended tissue recipes per IEEE-1528

Sensitivity in Air

Channel X:	1.2 μ V/(V/m) ²
Channel Y:	1.2 μ V/(V/m) ²
Channel Z:	1.2 μ V/(V/m) ²
Diode Compression Point:	95 mV

NCL Calibration Laboratories

Division of APREL Laboratories.

Sensitivity in Head Tissue Measured**Frequency:** 835 MHz**Epsilon:** 41.24 (+/-5%) **Sigma:** 0.87 S/m (+/-5%)**ConvF****Channel X:** 6.5**Channel Y:** 6.5**Channel Z:** 6.5

Tissue sensitivity values were calculated using the load impedance of the APREL Laboratories Daq-Paq.

Boundary Effect:

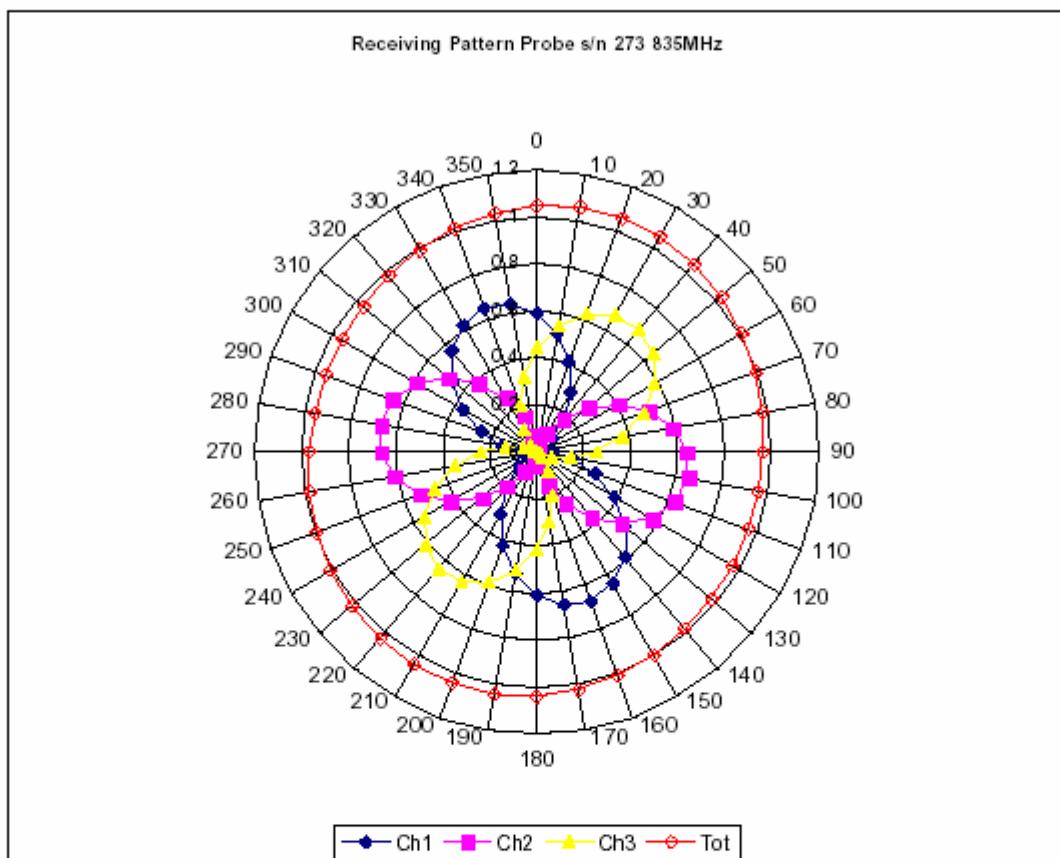
Uncertainty resulting from the boundary effect is less than 2% for the distance between the tip of the probe and the tissue boundary, when less than 2.44mm.

Spatial Resolution:

The measured probe tip diameter is 5 mm (+/- 0.01 mm) and therefore meets the requirements of SSI/DRB-TP-D01-032 for spatial resolution.

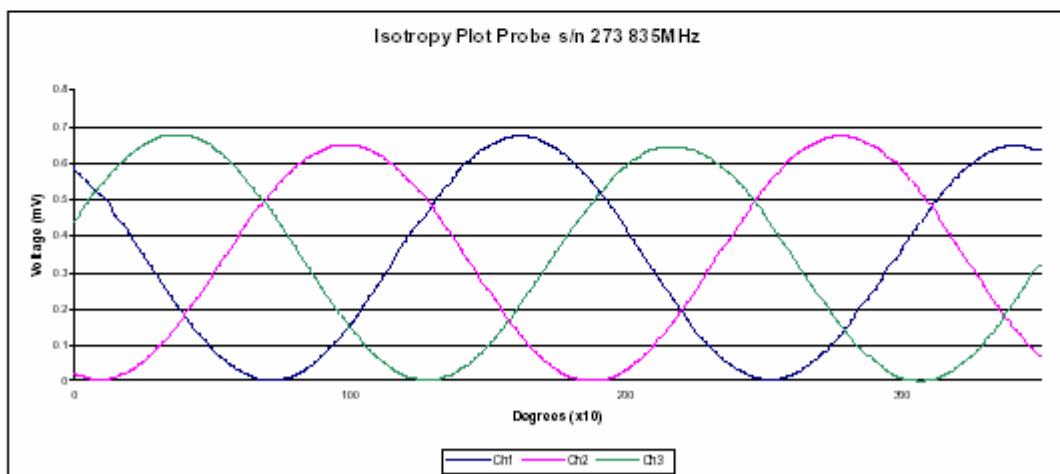
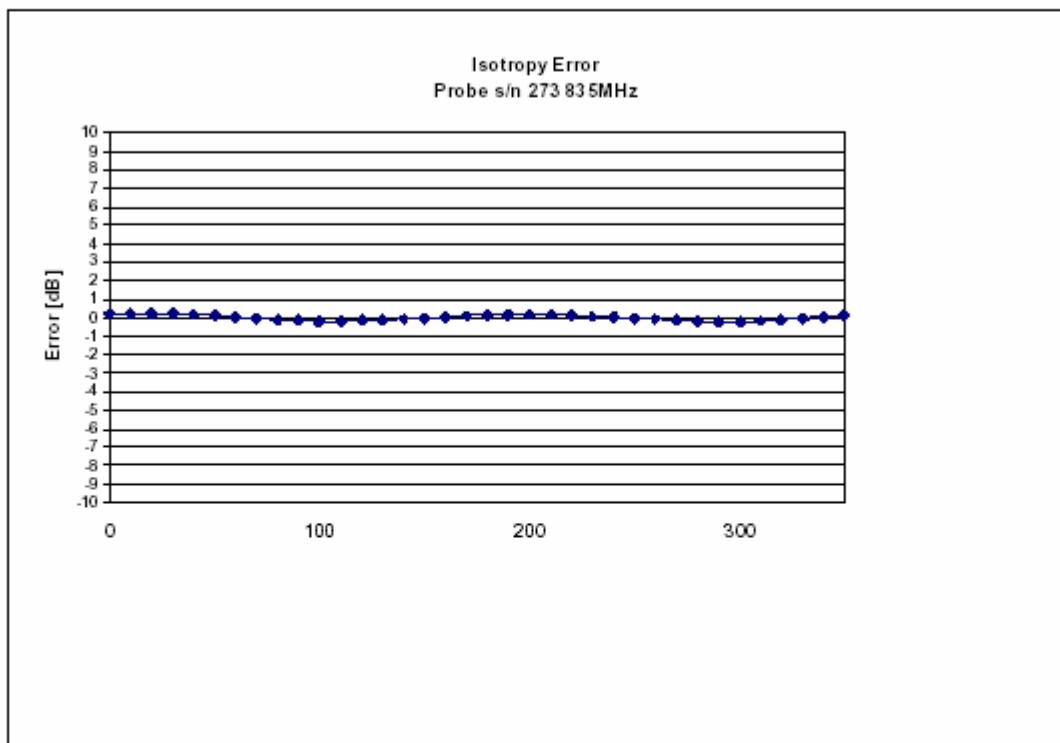
NCL Calibration Laboratories

Division of APREL Laboratories.

Receiving Pattern 835 MHz (Air)

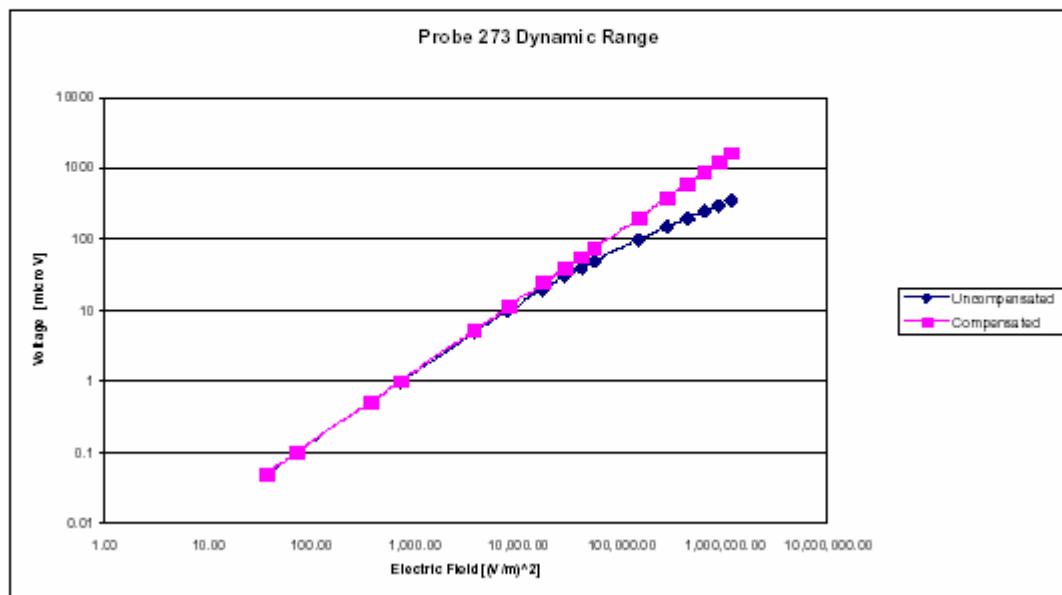
NCL Calibration Laboratories

Division of APREL Laboratories.

Isotropy Error 835 MHz (Air)**Isotropicity Tissue:** 0.10 dB

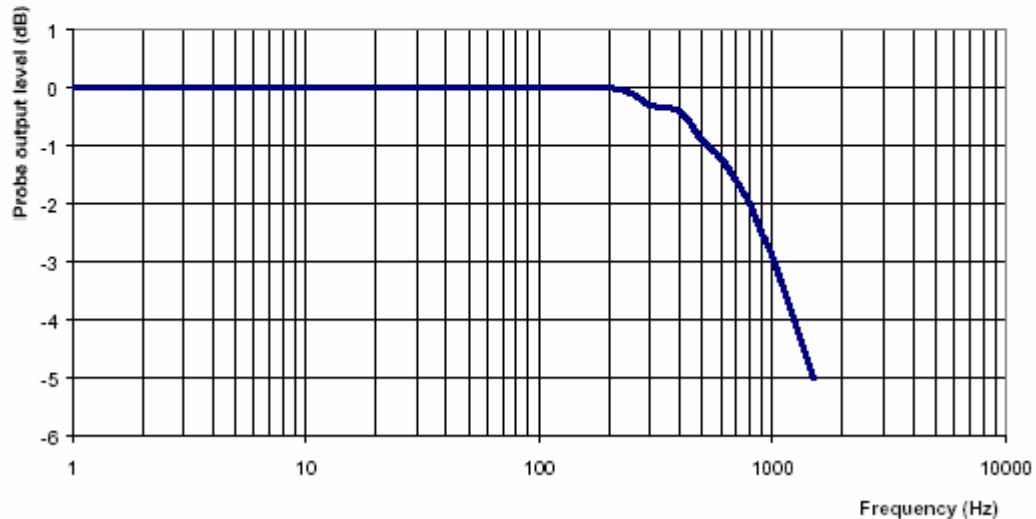
NCL Calibration Laboratories

Division of APREL Laboratories.

Dynamic Range

NCL Calibration Laboratories

Division of APREL Laboratories.

Video Bandwidth**Probe Frequency Characteristics**

Video Bandwidth at 500 Hz 1 dB
Video Bandwidth at 1.02 KHz: 3 dB

NCL Calibration Laboratories

Division of APREL Laboratories.

Conversion Factor Uncertainty Assessment**Frequency:** 835MHz**Epsilon:** 41.24 (+/-5%) **Sigma:** 0.87 S/m (+/-5%)**ConvF****Channel X:** 6.5 7%(K=2)**Channel Y:** 6.5 7%(K=2)**Channel Z:** 6.5 7%(K=2)

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

Boundary Effect:

For a distance of 2.5mm the evaluated uncertainty (increase in the probe sensitivity) is less than 2%.

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2009.

Page 10 of 10

This page has been reviewed for content and attested to on Page 2 of this document.

NCL CALIBRATION LABORATORIES

Calibration File No.: CP-1014

Client.: BACL

CERTIFICATE OF CALIBRATION

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe 835 MHz

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 273

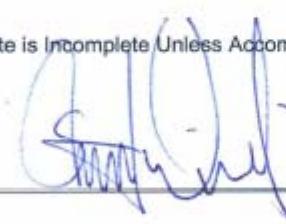
Calibration in Body Tissue

Calibration Procedure: SSI/DRB-TP-D01-032-E020-V2

Project No: BACB-E field probe-cal-5476

Calibrated: 5th September 2009Released on: 9th September 2009

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: **NCL CALIBRATION LABORATORIES**51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6Division of APREL Lab.
TEL: (613) 820-4968
FAX: (613) 820-4161

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report reproduces the results of the calibration performed in line with the SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure. The results contained within this report are for APREL E-Field Probe E-020 273.

References

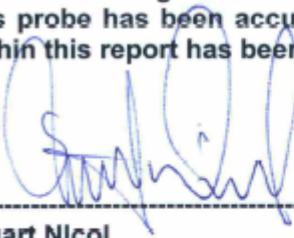
SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"
SSI-TP-011 Tissue Calibration Procedure

Conditions

Probe 273 was a re- calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this probe has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol

Jesse Hones

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

Probe Type:	E-Field Probe E-020
Serial Number:	273
Frequency:	835 MHz
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte*
Tip Diameter:	<5 mm
Tip Length:	60 mm
Total Length:	290 mm

*Resistive to recommended tissue recipes per IEEE-1528

Sensitivity in Air

Channel X:	1.2 μ V/(V/m) ²
Channel Y:	1.2 μ V/(V/m) ²
Channel Z:	1.2 μ V/(V/m) ²
Diode Compression Point:	95 mV

NCL Calibration Laboratories

Division of APREL Laboratories.

Sensitivity in Body Tissue Measured**Frequency:** 835 MHz**Epsilon:** 56.16 (+/-5%) **Sigma:** 0.99 S/m (+/-10%)**ConvF****Channel X:** 6.7**Channel Y:** 6.7**Channel Z:** 6.7

Tissue sensitivity values were calculated using the load impedance of the APREL Laboratories Daq-Paq.

Boundary Effect:

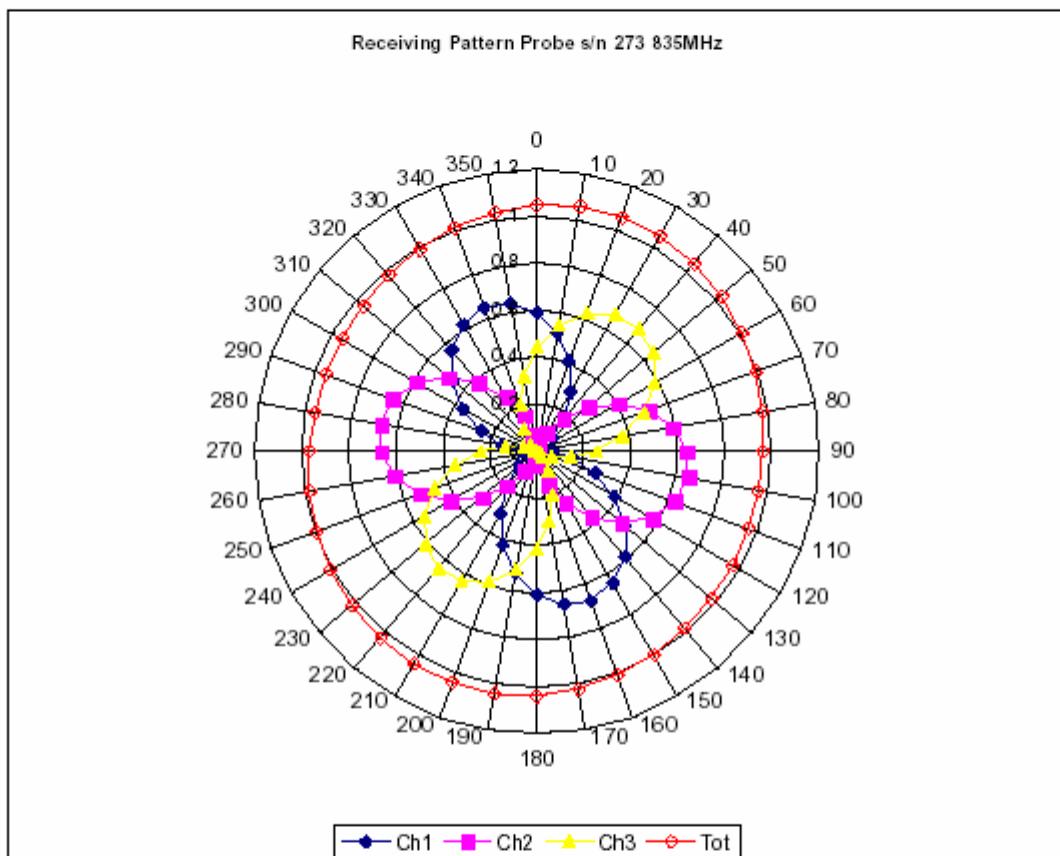
Uncertainty resulting from the boundary effect is less than 2% for the distance between the tip of the probe and the tissue boundary, when less than 2.44mm.

Spatial Resolution:

The measured probe tip diameter is 5 mm (+/- 0.01 mm) and therefore meets the requirements of SSI/DRB-TP-D01-032 for spatial resolution.

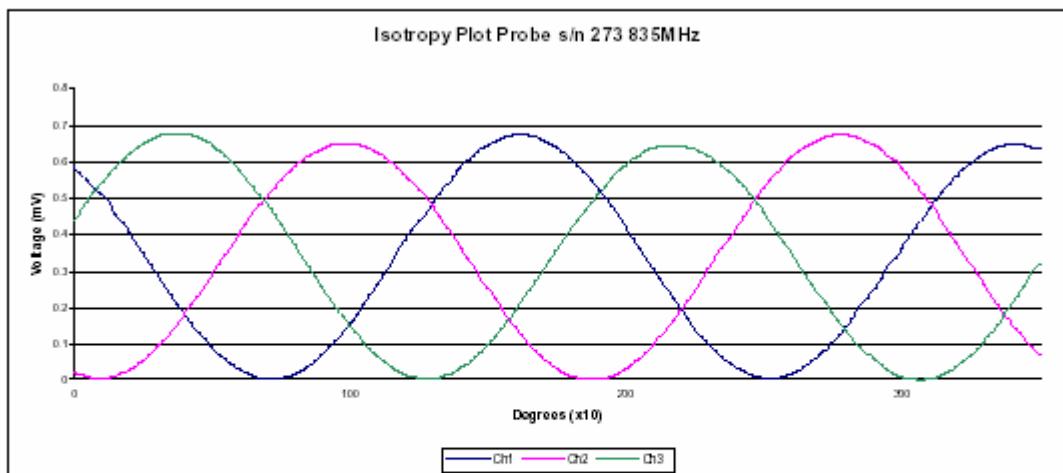
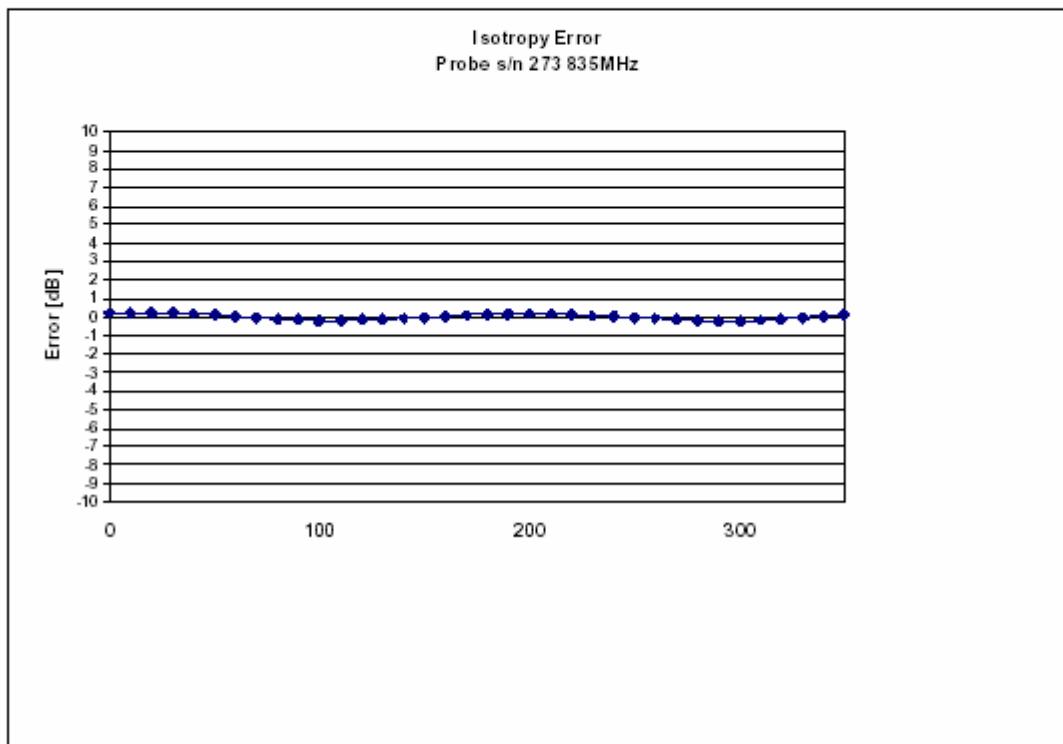
NCL Calibration Laboratories

Division of APREL Laboratories.

Receiving Pattern 835 MHz (Air)

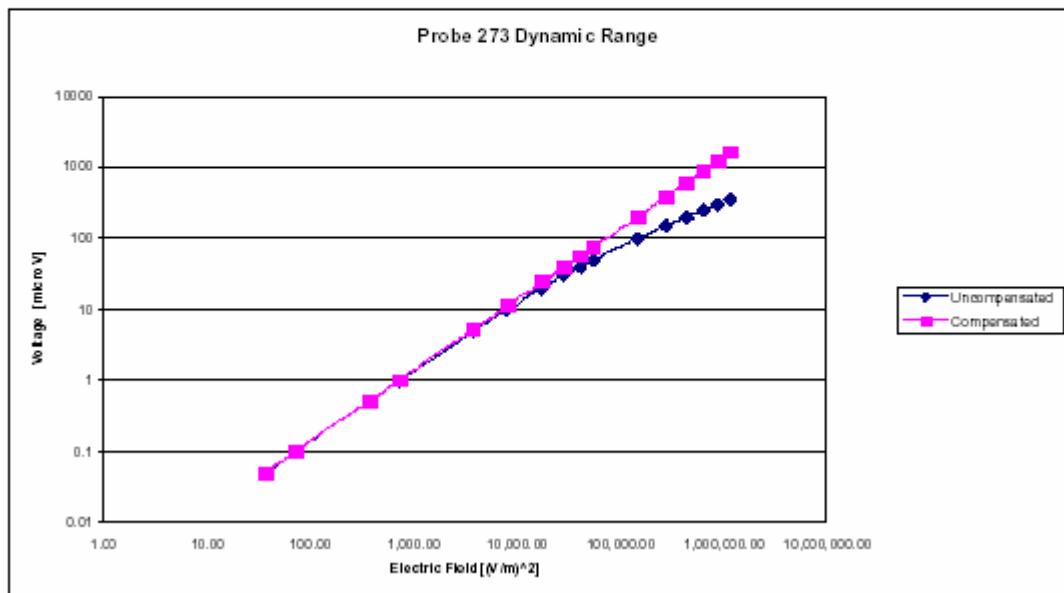
NCL Calibration Laboratories

Division of APREL Laboratories.

Isotropy Error 835 MHz (Air)**Isotropicity in Tissue:** 0.10 dB

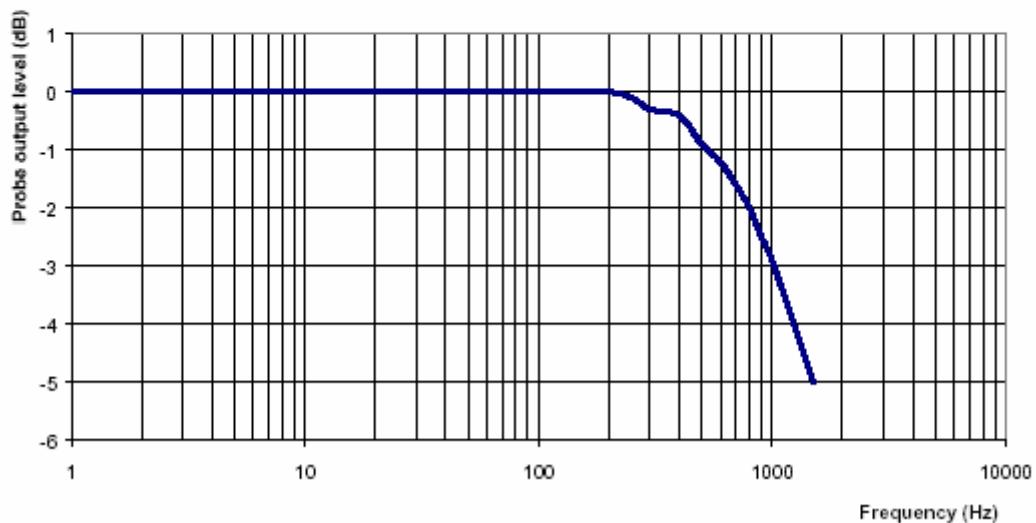
NCL Calibration Laboratories

Division of APREL Laboratories.

Dynamic Range

NCL Calibration Laboratories

Division of APREL Laboratories.

Video Bandwidth**Probe Frequency Characteristics**

Video Bandwidth at 500 Hz 1 dB
Video Bandwidth at 1.02 KHz: 3 dB

NCL Calibration Laboratories

Division of APREL Laboratories.

Conversion Factor Uncertainty Assessment**Frequency:** 835MHz**Epsilon:** 56.16 (+/-5%) **Sigma:** 0.99 S/m (+/-10%)**ConvF****Channel X:** 6.7 7%(K=2)**Channel Y:** 6.7 7%(K=2)**Channel Z:** 6.7 7%(K=2)

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

Boundary Effect:

For a distance of 2.4mm the evaluated uncertainty (increase in the probe sensitivity) is less than 2%.

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2009.

Page 10 of 10

This page has been reviewed for content and attested to on Page 2 of this document.

NCL CALIBRATION LABORATORIES

Calibration File No.: CP-1015

Client.: BACL

CERTIFICATE OF CALIBRATION

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe 1900 MHz

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 273

Calibration in Head Tissue

Calibration Procedure: SSI/DRB-TP-D01-032-E020-V2

Project No: BACB-E field probe-cal-5476

Calibrated: 7th September 2009
Released on: 9th September 2009

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: _____

NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4161

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report reproduces the results of the calibration performed in line with the SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure. The results contained within this report are for APREL E-Field Probe E-020 273.

References

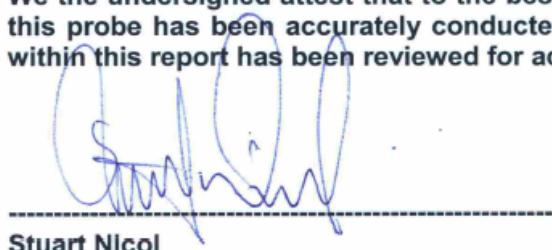
SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"
SSI-TP-011 Tissue Calibration Procedure

Conditions

Probe 273 was a re-calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this probe has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol



Jesse Hones

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

Probe Type:	E-Field Probe E-020
Serial Number:	273
Frequency:	1900 MHz
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte*
Tip Diameter:	<5 mm
Tip Length:	60 mm
Total Length:	290 mm

*Resistive to recommended tissue recipes per IEEE-1528

Sensitivity in Air

Channel X:	1.2 μ V/(V/m) ²
Channel Y:	1.2 μ V/(V/m) ²
Channel Z:	1.2 μ V/(V/m) ²
Diode Compression Point:	95 mV

NCL Calibration Laboratories

Division of APREL Laboratories.

Sensitivity in Head Tissue Measured**Frequency:** 1900 MHz**Epsilon:** 38.50 (+/-5%) **Sigma:** 1.40 S/m (+/-5%)**ConvF****Channel X:** 5.25**Channel Y:** 5.25**Channel Z:** 5.25

Tissue sensitivity values were calculated using the load impedance of the APREL Laboratories Daq-Paq.

Boundary Effect:

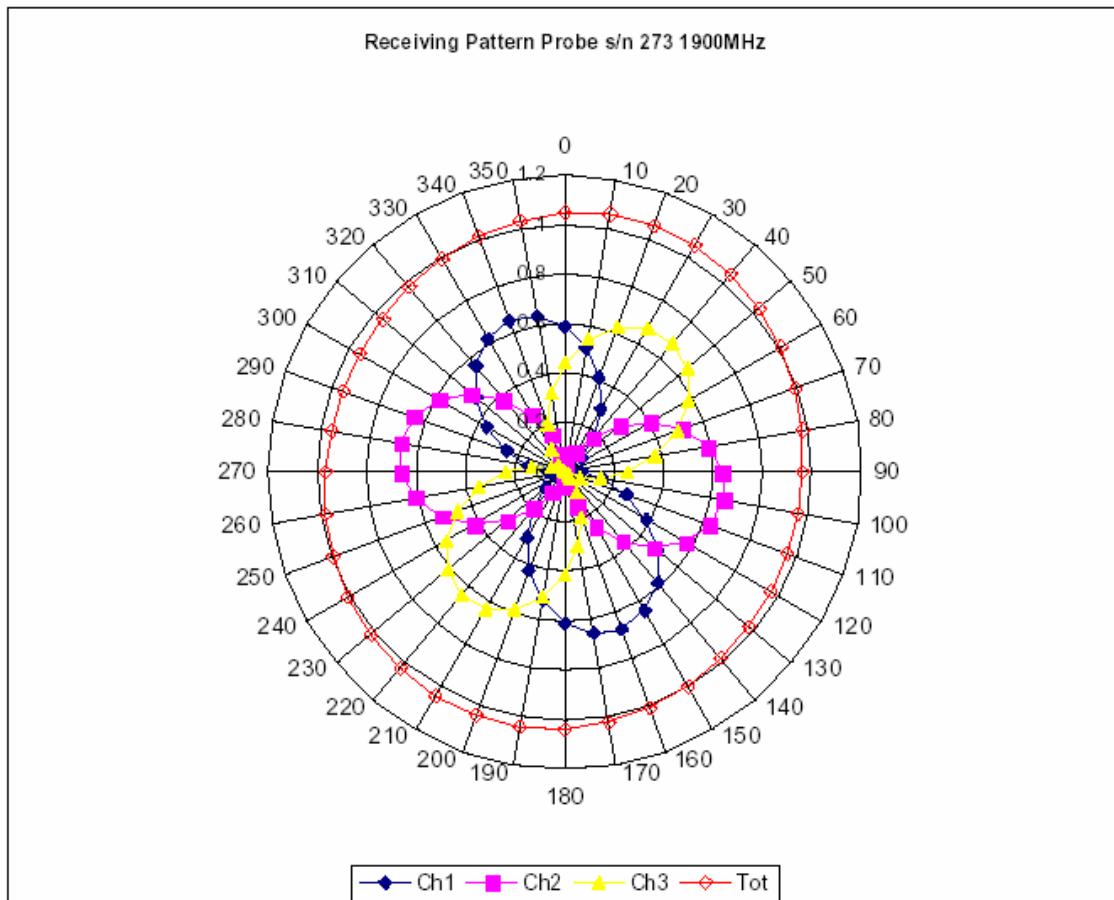
Uncertainty resulting from the boundary effect is less than 2% for the distance between the tip of the probe and the tissue boundary, when less than 2.44mm.

Spatial Resolution:

The measured probe tip diameter is 5 mm (+/- 0.01 mm) and therefore meets the requirements of SSI/DRB-TP-D01-032 for spatial resolution.

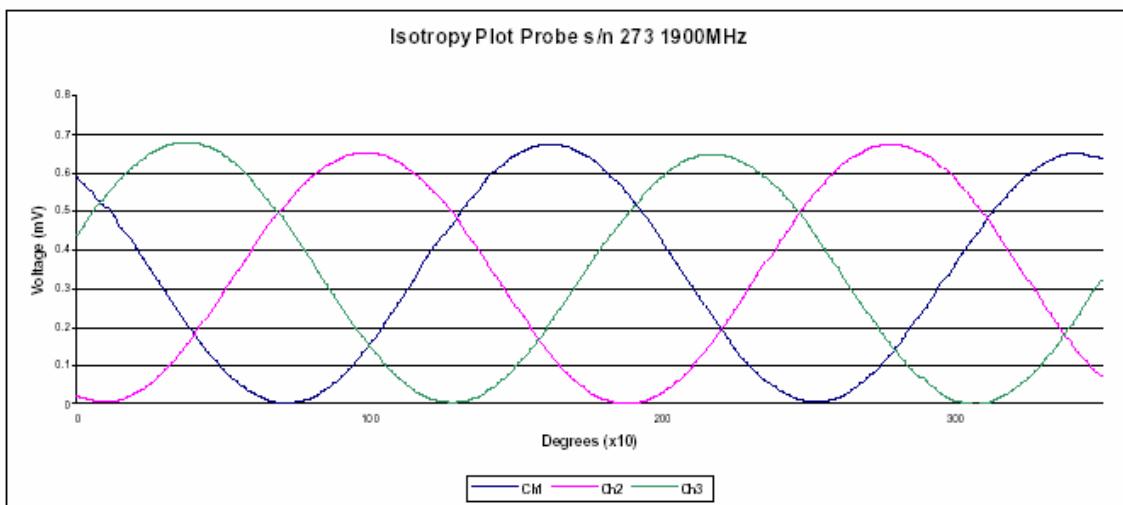
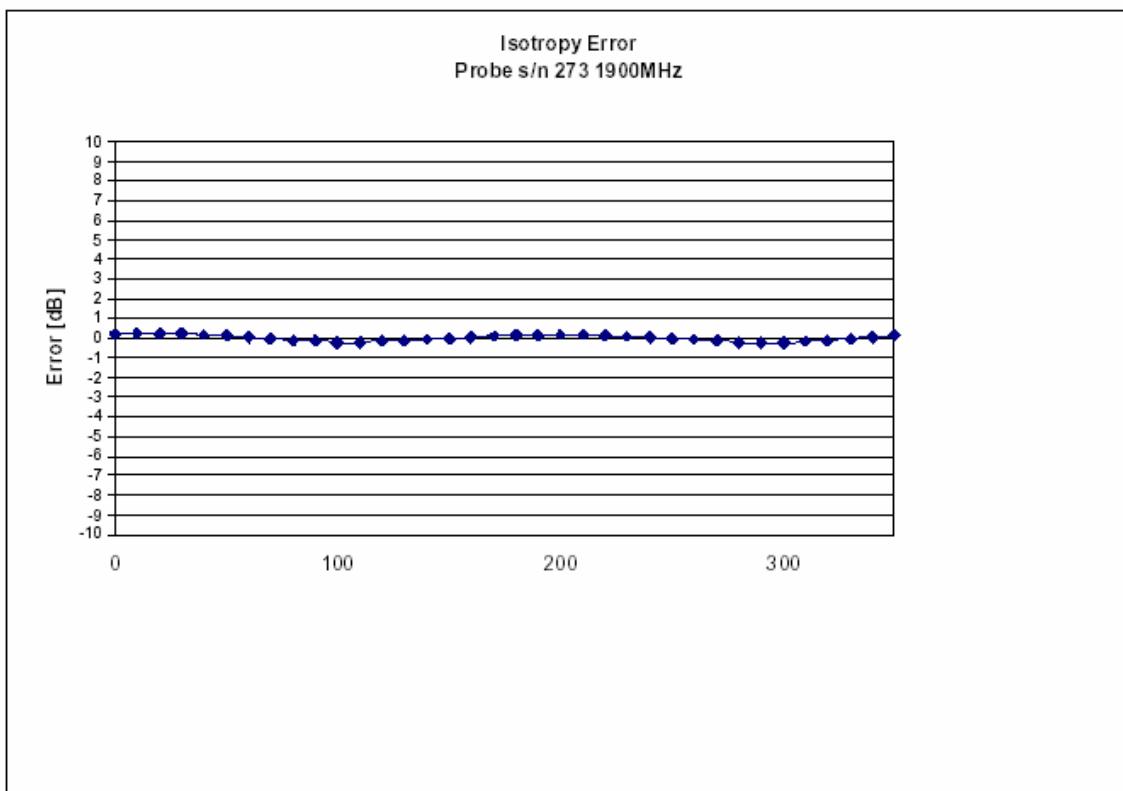
NCL Calibration Laboratories

Division of APREL Laboratories.

Receiving Pattern 1900 MHz (Air)

NCL Calibration Laboratories

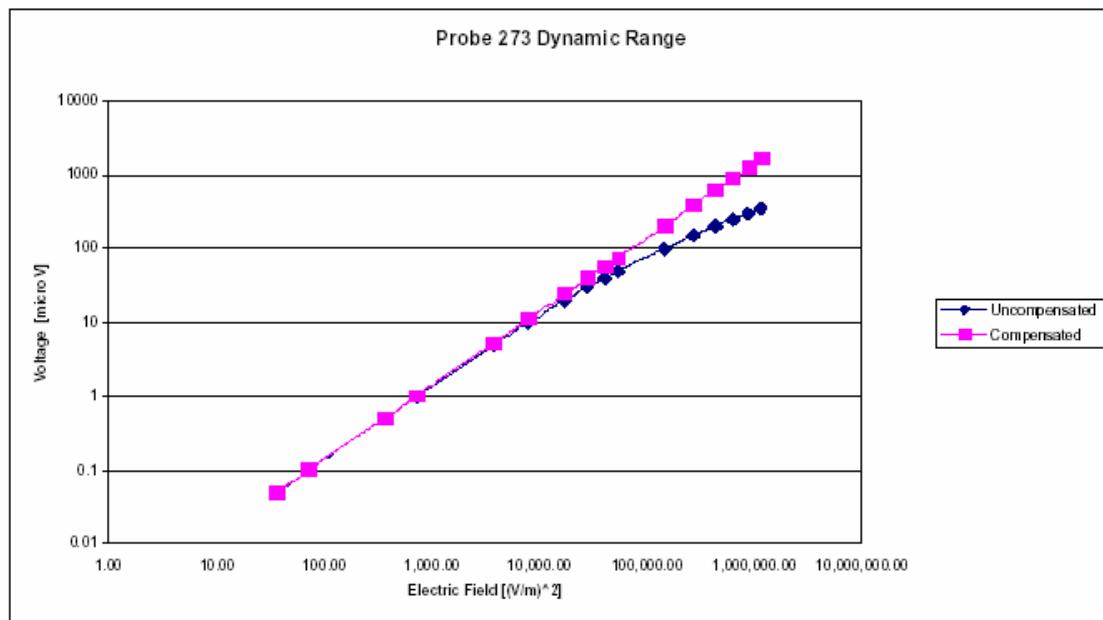
Division of APREL Laboratories.

Isotropy Error 1900 MHz (Air)**Isotropicity in Tissue:**

0.10 dB

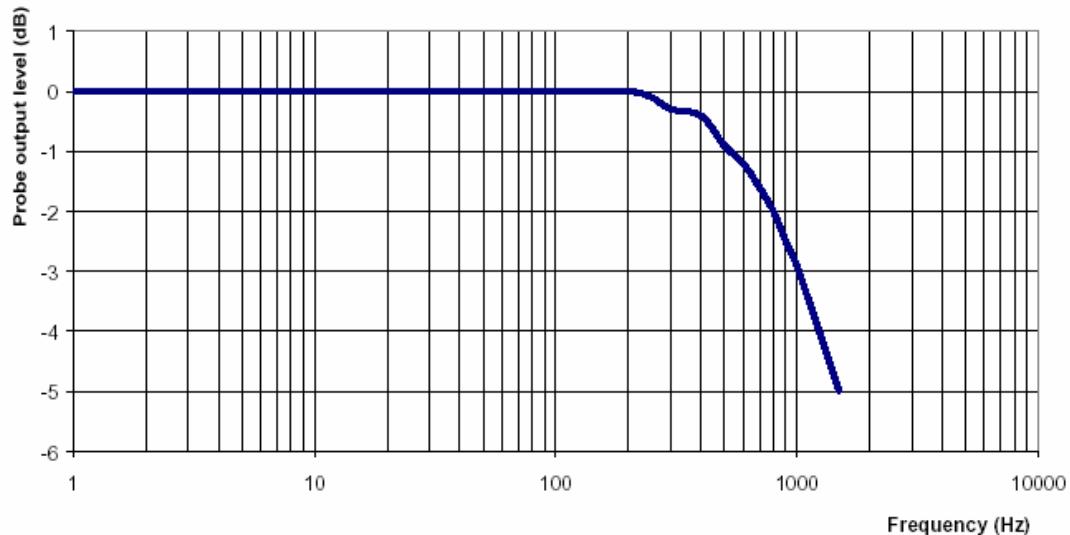
NCL Calibration Laboratories

Division of APREL Laboratories.

Dynamic Range

NCL Calibration Laboratories

Division of APREL Laboratories.

Video Bandwidth**Probe Frequency Characteristics**

Video Bandwidth at 500 Hz 1 dB
Video Bandwidth at 1.02 KHz: 3 dB

NCL Calibration Laboratories

Division of APREL Laboratories.

Conversion Factor Uncertainty Assessment**Frequency:** 1900MHz**Epsilon:** 38.50 (+/-5%) **Sigma:** 1.40 S/m (+/-5%)**ConvF****Channel X:** 5.25 7%(K=2)**Channel Y:** 5.25 7%(K=2)**Channel Z:** 5.25 7%(K=2)

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

Boundary Effect:

For a distance of 2.4mm the evaluated uncertainty (increase in the probe sensitivity) is less than 2%.

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2009.

Page 10 of 10

This page has been reviewed for content and attested to on Page 2 of this document.

NCL CALIBRATION LABORATORIES

Calibration File No.: CP-1016

Client.: BACL

C E R T I F I C A T E O F C A L I B R A T I O N

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe 1900 MHz

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 273

Calibration in Body Tissue

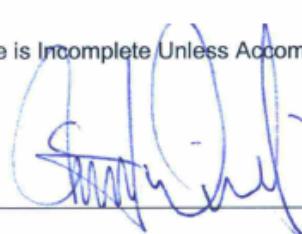
Calibration Procedure: SSI/DRB-TP-D01-032-E020-V2

Project No: BACB-E field probe-cal-5476

Calibrated: 7th September 2009
Released on: 9th September 2009

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By:



NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4161

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report reproduces the results of the calibration performed in line with the SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure. The results contained within this report are for APREL E-Field Probe E-020 273.

References

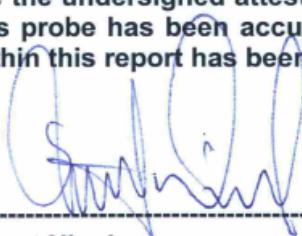
SSI/DRB-TP-D01-032-E020-V2 E-Field Probe Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"
SSI-TP-011 Tissue Calibration Procedure

Conditions

Probe 273 was a re-calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this probe has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol

Jesse Hones

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

Probe Type:	E-Field Probe E-020
Serial Number:	273
Frequency:	1900 MHz
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte*
Tip Diameter:	<5 mm
Tip Length:	60 mm
Total Length:	290 mm

*Resistive to recommended tissue recipes per IEEE-1528

Sensitivity in Air

Channel X:	1.2 μ V/(V/m) ²
Channel Y:	1.2 μ V/(V/m) ²
Channel Z:	1.2 μ V/(V/m) ²
Diode Compression Point:	95 mV

NCL Calibration Laboratories

Division of APREL Laboratories.

Sensitivity in Body Tissue Measured**Frequency:** 1900 MHz**Epsilon:** 53.05 (+/-5%) **Sigma:** 1.58 S/m (+/-5%)**ConvF****Channel X:** 5.15**Channel Y:** 5.15**Channel Z:** 5.15

Tissue sensitivity values were calculated using the load impedance of the APREL Laboratories Daq-Paq.

Boundary Effect:

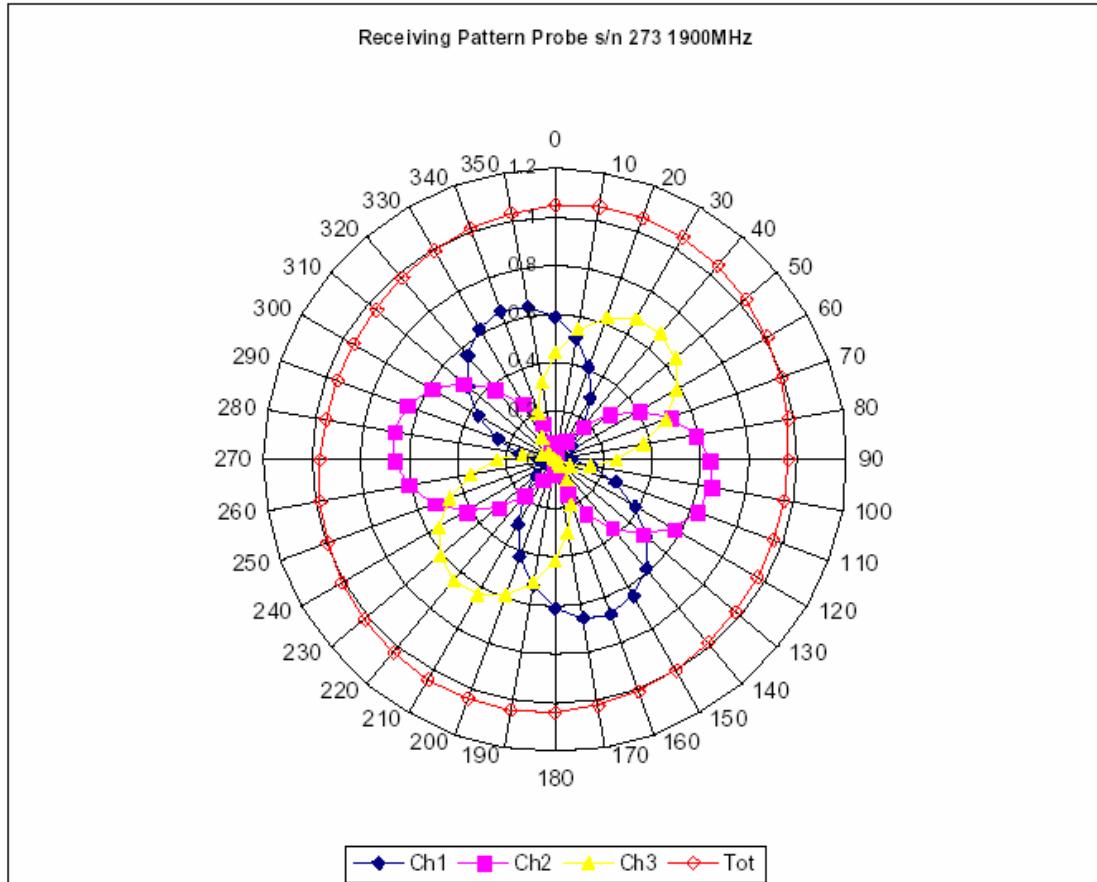
Uncertainty resulting from the boundary effect is less than 2% for the distance between the tip of the probe and the tissue boundary, when less than 2.44mm.

Spatial Resolution:

The measured probe tip diameter is 5 mm (+/- 0.01 mm) and therefore meets the requirements of SSI/DRB-TP-D01-032 for spatial resolution.

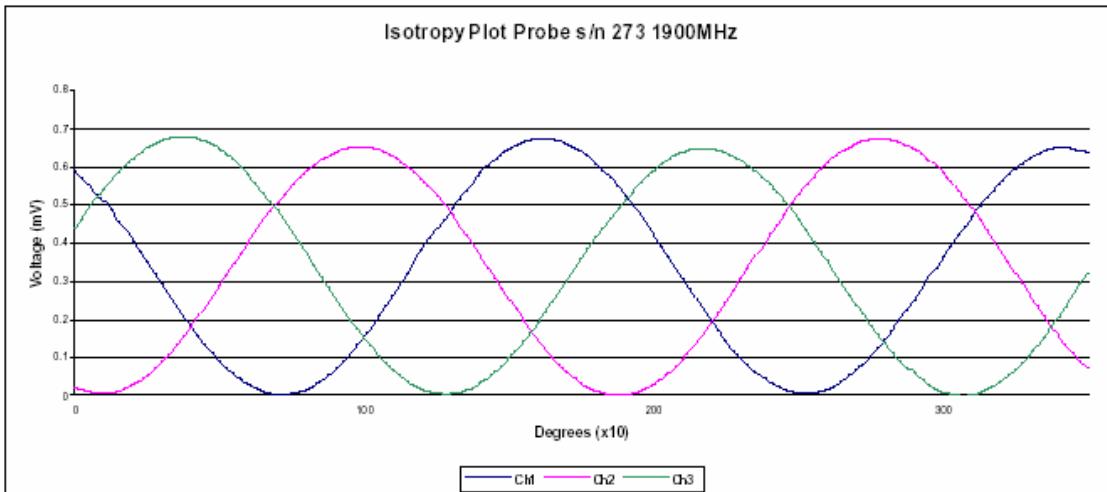
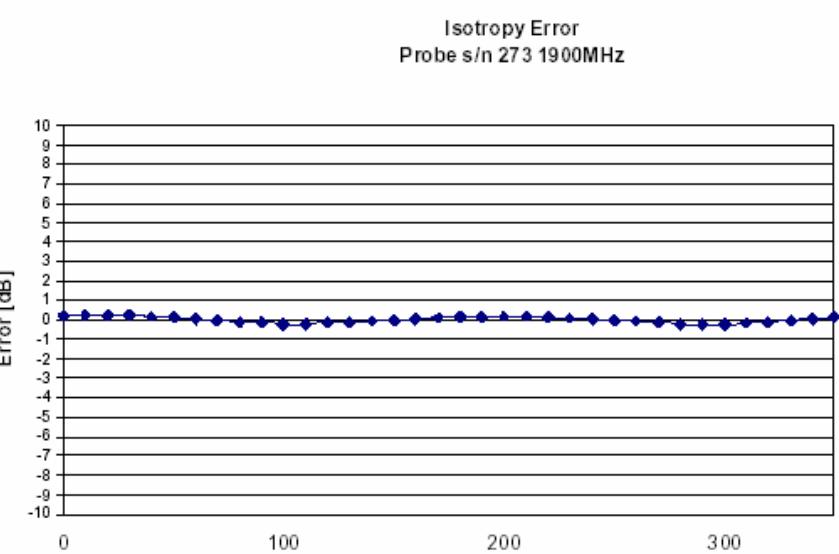
NCL Calibration Laboratories

Division of APREL Laboratories.

Receiving Pattern 1900 MHz (Air)

NCL Calibration Laboratories

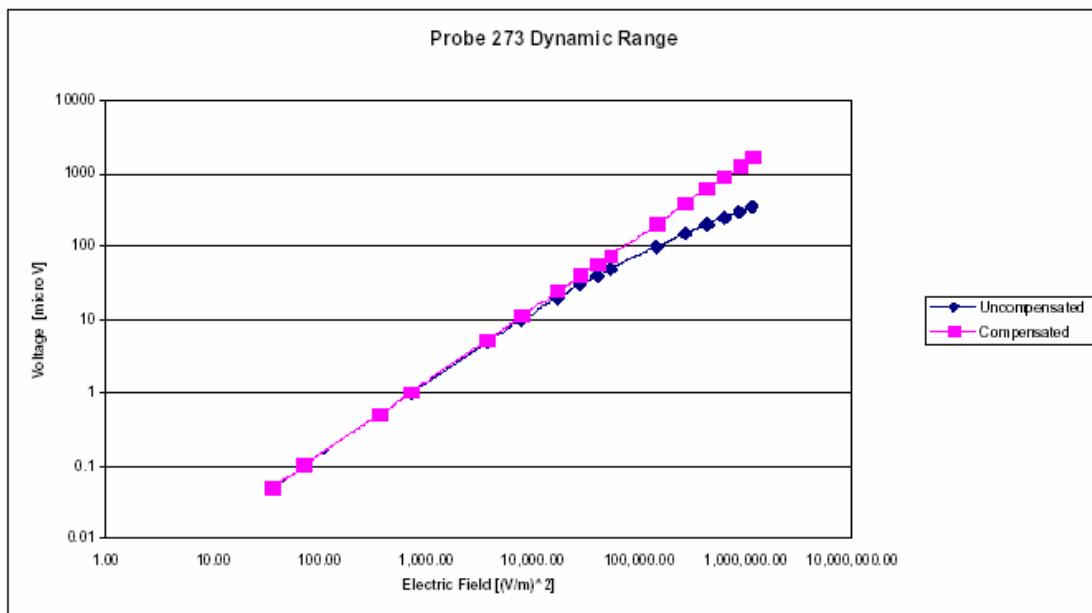
Division of APREL Laboratories.

Isotropy Error 1900 MHz (Air)**Isotropicity in Tissue:**

0.10 dB

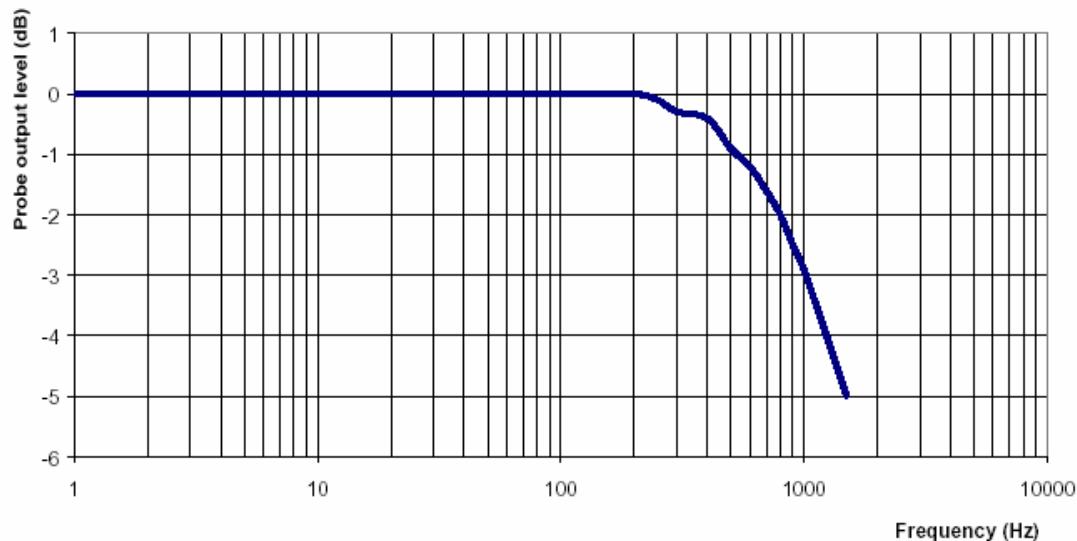
NCL Calibration Laboratories

Division of APREL Laboratories.

Dynamic Range

NCL Calibration Laboratories

Division of APREL Laboratories.

Video Bandwidth**Probe Frequency Characteristics**

Video Bandwidth at 500 Hz 1 dB
Video Bandwidth at 1.02 KHz: 3 dB

NCL Calibration Laboratories

Division of APREL Laboratories.

Conversion Factor Uncertainty Assessment**Frequency:** 1900MHz**Epsilon:** 53.05 (+/-5%) **Sigma:** 1.58 S/m (+/-5%)**ConvF****Channel X:** 5.15 7%(K=2)**Channel Y:** 5.15 7%(K=2)**Channel Z:** 5.15 7%(K=2)

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

Boundary Effect:

For a distance of 2.4mm the evaluated uncertainty (increase in the probe sensitivity) is less than 2%.

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2009.

Page 10 of 10

This page has been reviewed for content and attested to on Page 2 of this document.

APPENDIX C – DIPOLE CALIBRATION CERTIFICATES**NCL CALIBRATION LABORATORIES**

Calibration File No: DC-917
Project Number: BACL-ALSAS10U-5323

C E R T I F I C A T E O F C A L I B R A T I O N

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

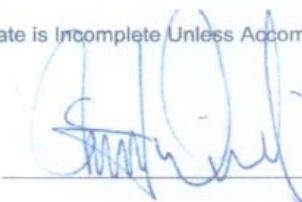
Validation Dipole

Manufacturer: APREL Laboratories
Part number: ALS-D-835-S-2
Frequency: 835 MHz
Serial No: 180-00558

Customer: Bay Area Compliance Laboratory

Calibrated: 1st September 2008
Released on: 1st September 2008

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: 

NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4162

NCL Calibration Laboratories

Division of APREL Laboratories.

Conditions

Dipole 180-00558 was new and taken from stock prior to calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this device has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol



C. Teodorian

This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

The following results relate the Calibrated Dipole and should be used as a quick reference for the user.

Mechanical Dimensions

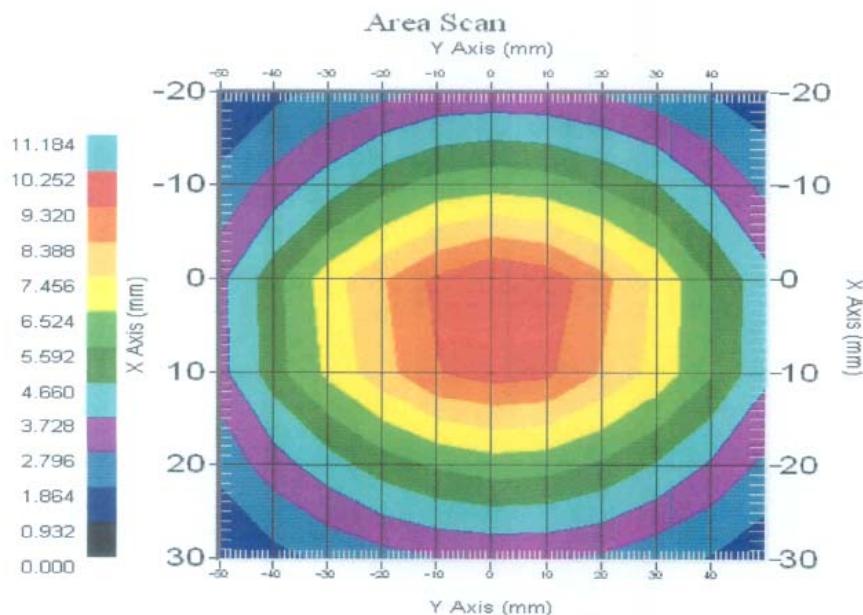
Length: 162.2 mm
Height: 89.4 mm

Electrical Specification

SWR: 1.018 U
Return Loss: -41.371 dB
Impedance: 51.739 Ω

System Validation Results

Frequency	1 Gram	10 Gram	Peak
835 MHz	9.49	6.1	14.21



This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report has been produced in line with the SSI Dipole Calibration Procedure SSI-TP-018-ALSAS. The results contained within this report are for Validation Dipole 180-00558. The calibration routine consisted of a three-step process. Step 1 was a mechanical verification of the dipole to ensure that it meets the mechanical specifications. Step 2 was an Electrical Calibration for the Validation Dipole, where the SWR, Impedance, and the Return loss were assessed. Step 3 involved a System Validation using the ALSAS-10U, along with APREL E-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure

SSI-TP-016 Tissue Calibration Procedure

IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

Conditions

Dipole 180-00558 was new taken from stock.

Ambient Temperature of the Laboratory:	22 °C +/- 0.5°C
Temperature of the Tissue:	20 °C +/- 0.5°C

This page has been reviewed for content and attested to by signature within this document.

4

NCL Calibration Laboratories

Division of APREL Laboratories.

Dipole Calibration Results**Mechanical Verification**

APREL Length	APREL Height	Measured Length	Measured Height
161.0 mm	89.8 mm	162.2 mm	89.4 mm

Tissue Validation

Head Tissue 835MHz	Measured
Dielectric constant, ϵ_r	41.12
Conductivity, σ [S/m]	0.92

This page has been reviewed for content and attested to by signature within this document.

5

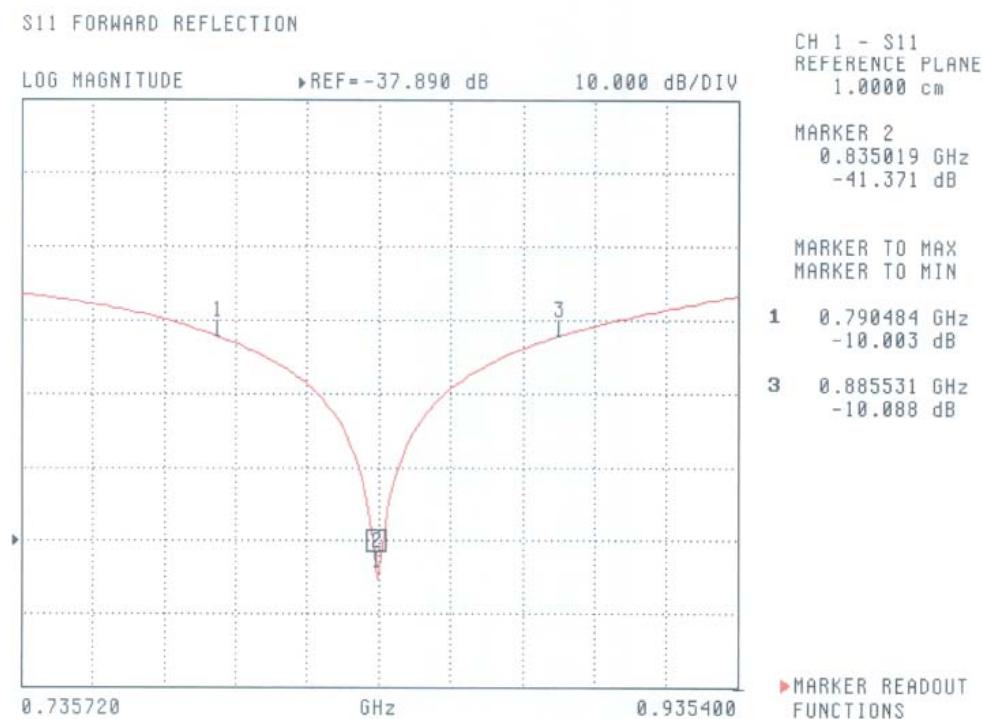
NCL Calibration Laboratories

Division of APREL Laboratories.

Electrical Calibration

Test	Result
S11 RL	-41.371 dB
SWR	1.018 U
Impedance	51.739 Ω

The Following Graphs are the results as displayed on the Vector Network Analyzer.

S11 Parameter Return Loss

This page has been reviewed for content and attested to by signature within this document.

6

NCL Calibration Laboratories
Division of APREL Laboratories.

SWR

S11 FORWARD REFLECTION

SWR

►REF=500.000 mU

1.000 U/DIV



CH 1 - S11
REFERENCE PLANE
1.0000 cm

MARKER 2
0.835019 GHz
1.018 U

MARKER TO MAX
MARKER TO MIN

1 0.790484 GHz
1.925 U

3 0.885531 GHz
1.911 U

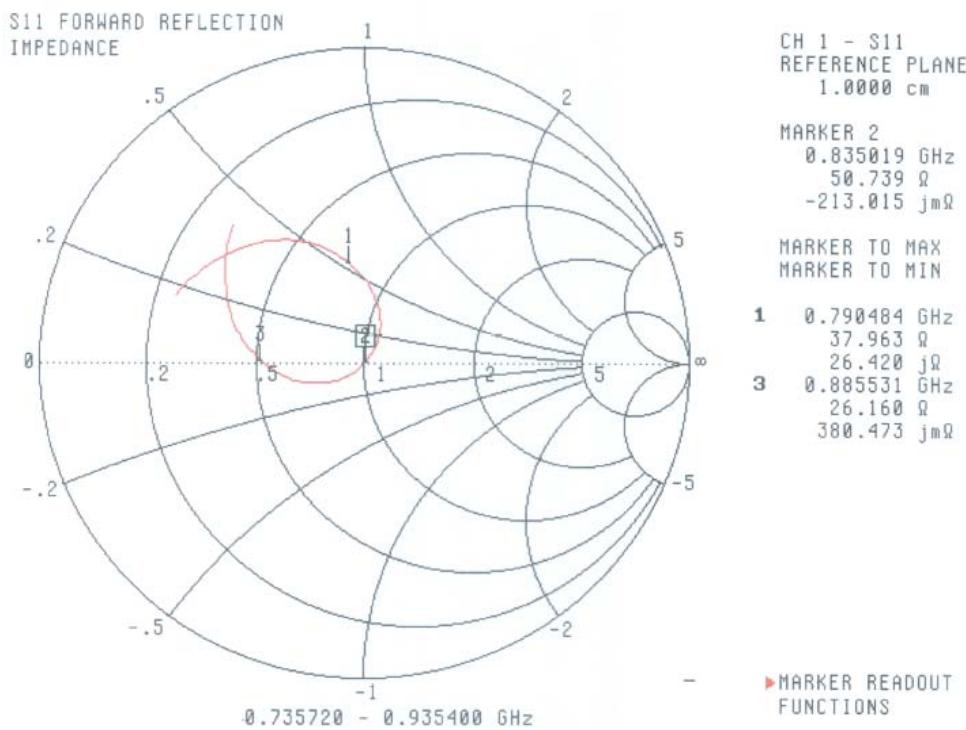
► MARKER READOUT
FUNCTIONS

This page has been reviewed for content and attested to by signature within this document.

7

NCL Calibration Laboratories

Division of APREL Laboratories.

Smith Chart Dipole Impedance

This page has been reviewed for content and attested to by signature within this document.

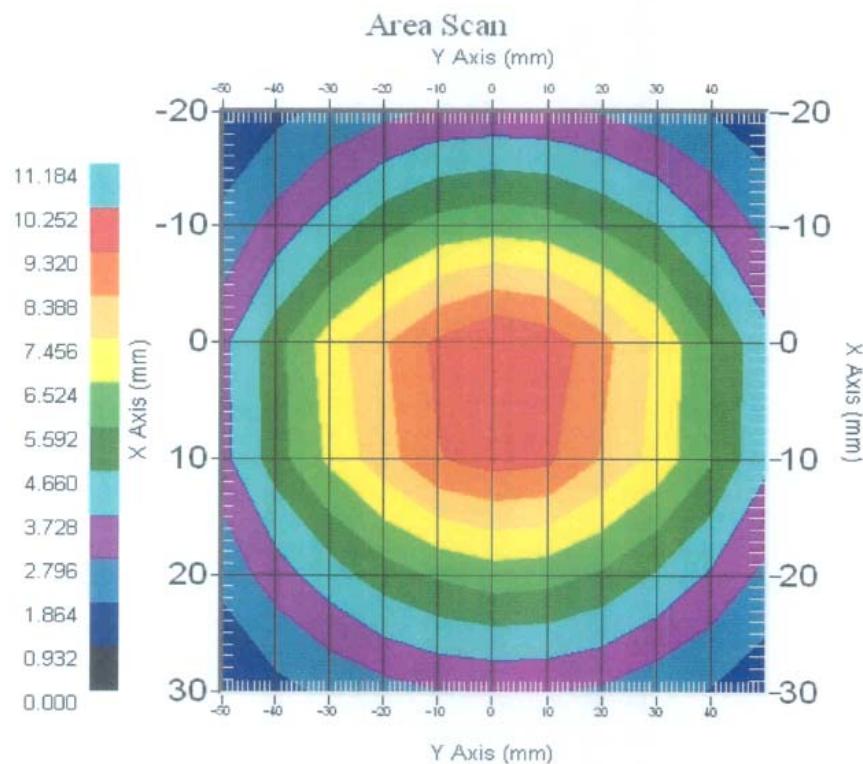
8

NCL Calibration Laboratories

Division of APREL Laboratories.

System Validation Results Using the Electrically Calibrated Dipole

Head Tissue Frequency	1 Gram	10 Gram	Peak Above Feed Point
835 MHz	9.49	6.1	14.21



This page has been reviewed for content and attested to by signature within this document.

9

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List 2008.

This page has been reviewed for content and attested to by signature within this document.

10

NCL CALIBRATION LABORATORIES

Calibration File No: DC-920
Project Number: BACL-ALSAS10U-5323

C E R T I F I C A T E O F C A L I B R A T I O N

It is certified that the equipment identified below has been calibrated in the
NCL CALIBRATION LABORATORIES by qualified personnel following recognized
procedures and using transfer standards traceable to NRC/NIST.

Validation Dipole

Manufacturer: APREL Laboratories
Part number: ALS-D-1900-S-2
Frequency: 1900 MHz
Serial No: 210-00710

Customer: Bay Area Compliance Laboratory

Calibrated: 1st September 2008
Released on: 1st September 2008

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: 

NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

Division of APREL Lab.
TEL: (613) 820-4988
FAX: (613) 820-4162

NCL Calibration Laboratories

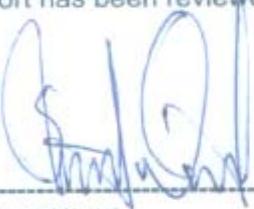
Division of APREL Laboratories.

Conditions

Dipole 210-00710 was new and taken from stock prior to calibration.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C
Temperature of the Tissue: 21 °C +/- 0.5°C

We the undersigned attest that to the best of our knowledge the calibration of this device has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol



C. Teodorian

This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

The following results relate the Calibrated Dipole and should be used as a quick reference for the user.

Mechanical Dimensions

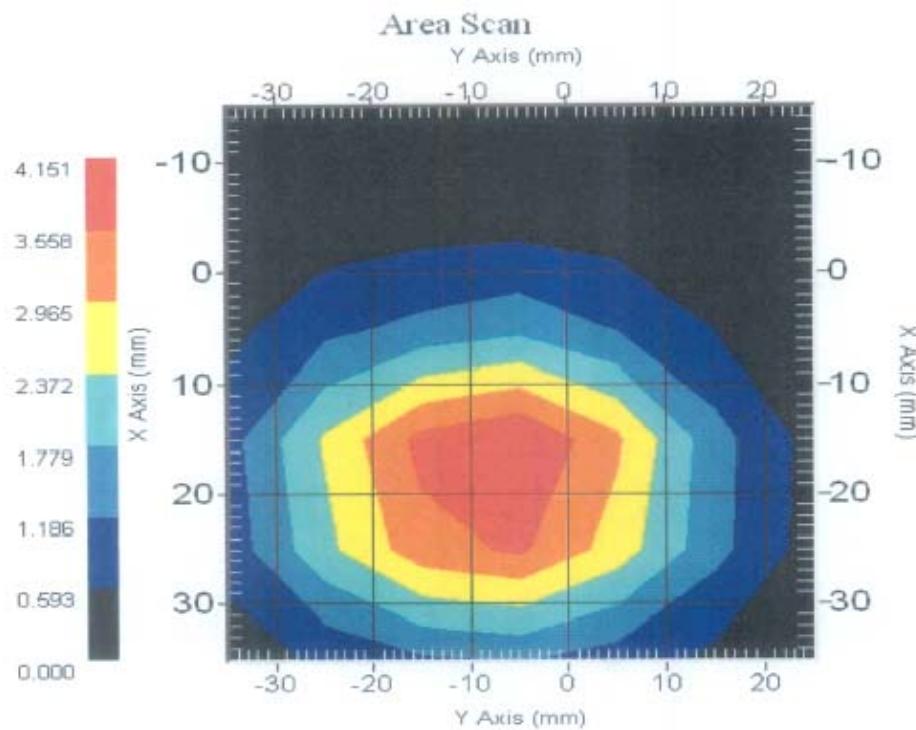
Length: 67.1 mm
Height: 38.9 mm

Electrical Specification

SWR: 1.059 U
Return Loss: -30.831 dB
Impedance: 50.914 Ω

System Validation Results

Frequency	1 Gram	10 Gram	Peak
1900 MHz	38.7	20.5	69.7



This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

Introduction

This Calibration Report has been produced in line with the SSI Dipole Calibration Procedure SSI-TP-018-ALSAS. The results contained within this report are for Validation Dipole 210-00710. The calibration routine consisted of a three-step process. Step 1 was a mechanical verification of the dipole to ensure that it meets the mechanical specifications. Step 2 was an Electrical Calibration for the Validation Dipole, where the SWR, Impedance, and the Return loss were assessed. Step 3 involved a System Validation using the ALSAS-10U, along with APREL E-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure

SSI-TP-016 Tissue Calibration Procedure

IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

Conditions

Dipole 210-00710 was new taken from stock.

Ambient Temperature of the Laboratory: 22 °C +/- 0.5°C

Temperature of the Tissue: 20 °C +/- 0.5°C

NCL Calibration Laboratories

Division of APREL Laboratories.

Dipole Calibration Results**Mechanical Verification**

APREL Length	APREL Height	Measured Length	Measured Height
68.0 mm	39.5 mm	67.1mm	38.9 mm

Tissue Validation

Head Tissue 1900 MHz	Measured
Dielectric constant, ϵ_r	40.03
Conductivity, σ [S/m]	1.38

This page has been reviewed for content and attested to by signature within this document.

5

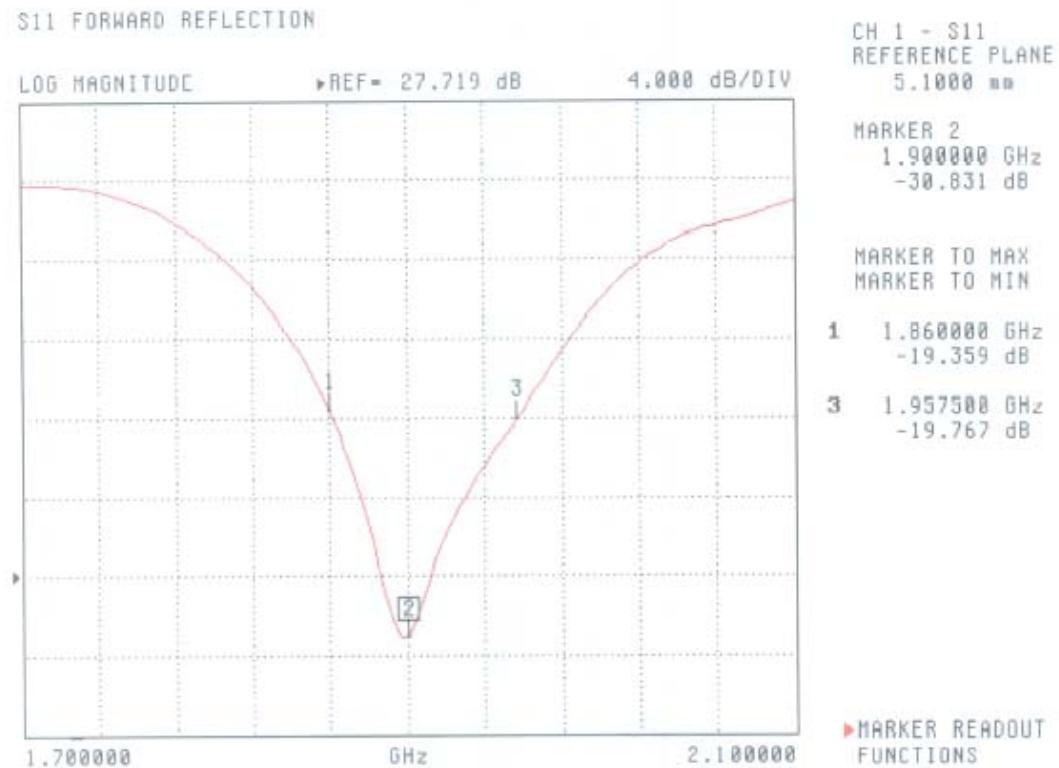
NCL Calibration Laboratories

Division of APREL Laboratories.

Electrical Calibration

Test	Result
S11 R/L	-30.831 dB
SWR	1.059 U
Impedance	50.914 Ω

The Following Graphs are the results as displayed on the Vector Network Analyzer.

S11 Parameter Return Loss

This page has been reviewed for content and attested to by signature within this document.

6

NCL Calibration Laboratories

Division of APREL Laboratories.

SWR

S11 FORWARD REFLECTION

SWR

REF = 449.865 mU

900.000 mU/DIV

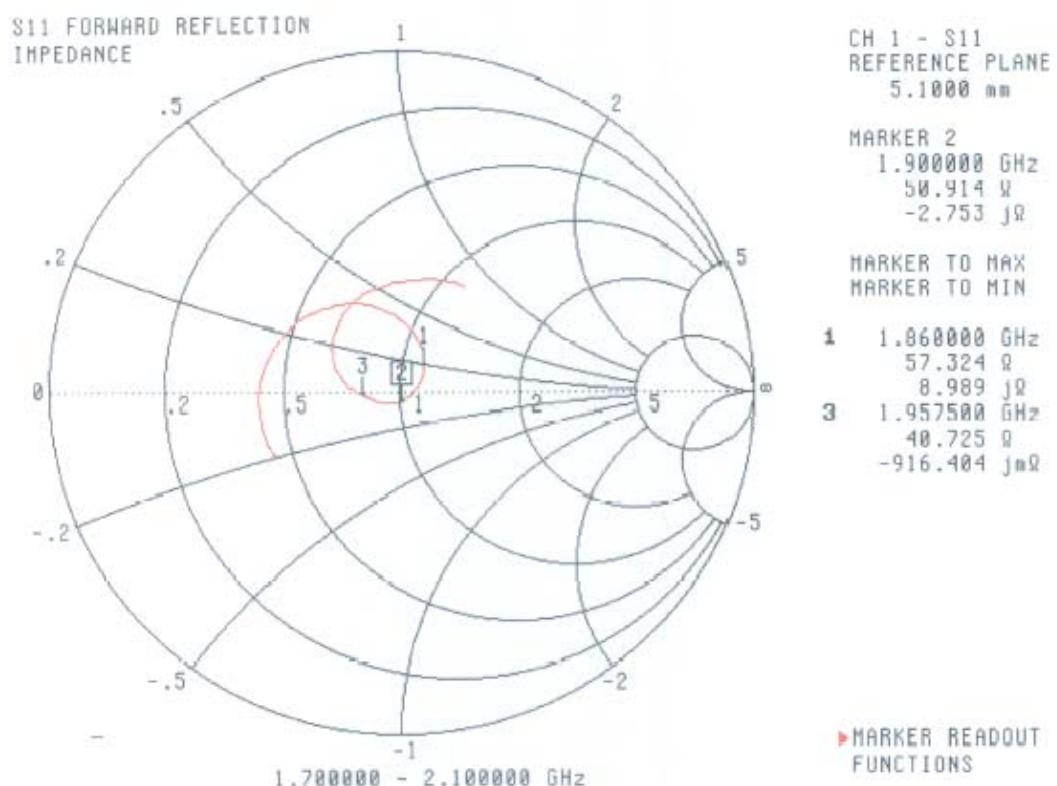


This page has been reviewed for content and attested to by signature within this document.

7

NCL Calibration Laboratories

Division of APREL Laboratories.

Smith Chart Dipole Impedance

This page has been reviewed for content and attested to by signature within this document.

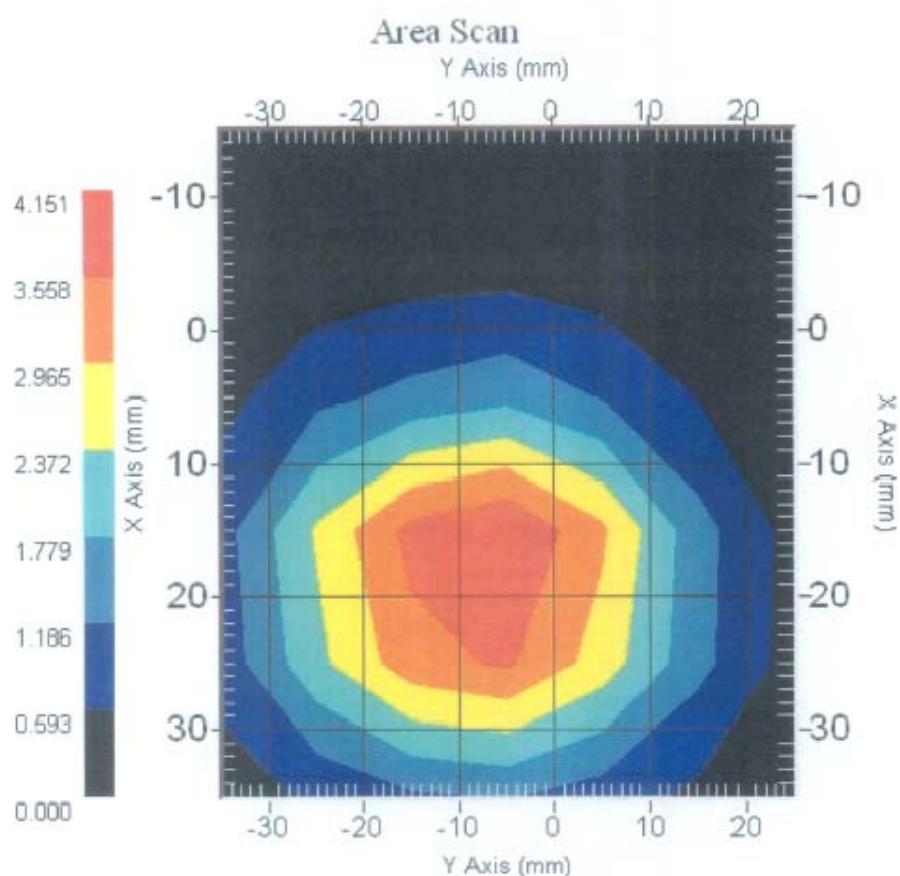
8

NCL Calibration Laboratories

Division of APREL Laboratories.

System Validation Results Using the Electrically Calibrated Dipole

Head Tissue Frequency	1 Gram	10 Gram	Peak Above Feed Point
1900 MHz	38.7	20.5	69.7



This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List 2007.

This page has been reviewed for content and attested to by signature within this document.

10

APPENDIX D – SAR SYSTEM VALIDATION DATA

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)

System Performance Check 835 MHz, Head Liquid

Dipole 835 MHz; Type: ALS-D-835-S-2; S/N: 180-00558

Product Data

Device Name : Dipole 835 MHz
 Serial No. : 180-00558
 Type : Dipole
 Model : ALS-D-835-S-2
 Frequency : 835.00 MHz
 Max. Transmit Pwr : 1 W
 Drift Time : 3 min(s)
 Power Drift-Start : 9.209 W/kg
 Power Drift-Finish : 9.222 W/kg
 Power Drift (%) : 0.319

Phantom Data

Name : APREL-Uni
 Type : Uni-Phantom
 Size (mm) : 280 x 280 x 200
 Serial No. : System Default
 Location : Center
 Description : Default
 Phantom Data

Tissue Data

Type : HEAD
 Serial No. : 270-01002
 Frequency : 835.00 MHz
 Last Calib. Date : 22-Feb-2010
 Temperature : 20.00 °C
 Ambient Temp. : 21.00 °C
 Humidity : 50.00 RH%
 Epsilon : 41.24 F/m
 Sigma : 0.90 S/m
 Density : 1000.00 kg/cu. m

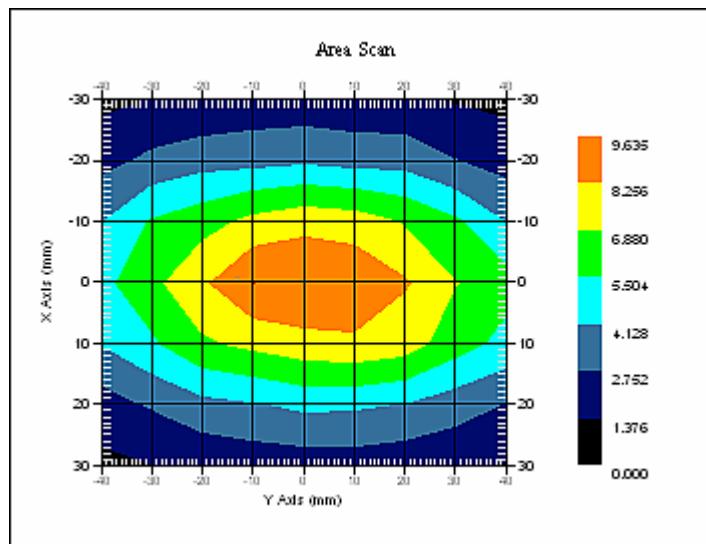
Probe Data

Name : E-Field
 Model : E-020
 Type : E-Field Triangle
 Serial No. : 273
 Last Calib. Date : 25-Jan-2010
 Frequency : 835.00 MHz
 Duty Cycle Factor : 1
 Conversion Factor : 6.5
 Probe Sensitivity : 1.20 1.20 1.20 μV/(V/m)2
 Compression Point : 95.00 mV
 Offset : 1.56 mm

Measurement Data

Crest Factor : 1
 Scan Type : Complete
 Tissue Temp. : 21.00 °C
 Ambient Temp. : 21.00 °C
 Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
 Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 9.427 W/kg
10 gram SAR value : 6.113 W/kg
Area Scan Peak SAR : 10.895 W/kg
Zoom Scan Peak SAR : 14.853 W/kg



835 MHz System Validation

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**System Performance Check 1900 MHz, Head Liquid****Dipole 1900 MHz; Type: ALS-D-1900-S-2; S/N: 210-00710****Product Data**

Device Name : Dipole 1900MHz
Serial No. : 210-00710
Type : Dipole
Model : ALS-D-1900-S-2
Frequency : 1900.00 MHz
Max. Transmit Pwr : 1 W
Drift Time : 3 min(s)
Power Drift-Start : 45.557 W/kg
Power Drift-Finish : 47.342 W/kg
Power Drift (%) : 3.917

Phantom Data

Name : APREL-Uni
Type : Uni-Phantom
Size (mm) : 280 x 280 x 200
Serial No. : System Default
Location : Center
Description : Default

Tissue Data

Type : HEAD
Serial No. : 295-01103
Frequency : 1900.00 MHz
Last Calib. Date : 22-Feb-2010
Temperature : 20.00 °C
Ambient Temp. : 20.00 °C
Humidity : 56.00 RH%
Epsilon : 40.27 F/m
Sigma : 1.41 S/m
Density : 1000.00 kg/cu. m

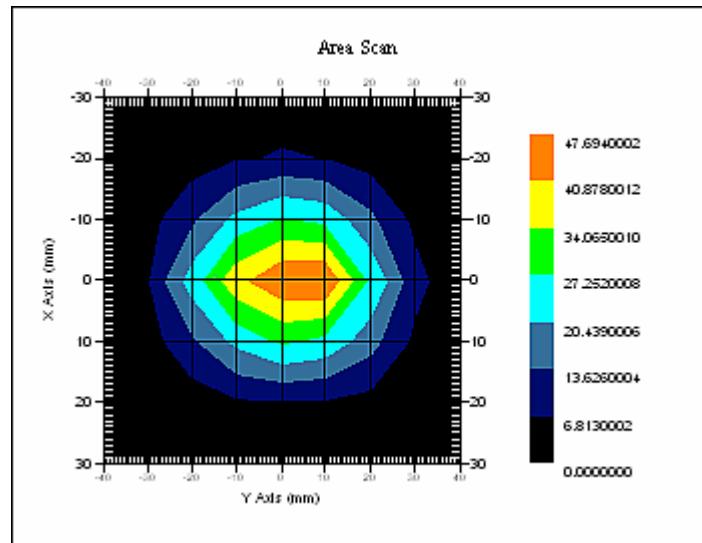
Probe Data

Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 273
Last Calib. Date : 05-Sep-2009
Frequency : 1900.00 MHz
Duty Cycle Factor : 1
Conversion Factor : 5.25
Probe Sensitivity : 1.20 1.20 1.20 μV/(V/m)
Compression Point : 95.00 mV
Offset : 1.56 mm

Measurement Data

Crest Factor : 1
Scan Type : Complete
Tissue Temp. : 20.00 °C
Ambient Temp. : 20.00 °C
Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 40.263 W/kg
10 gram SAR value : 20.483 W/kg
Area Scan Peak SAR : 45.824 W/kg
Zoom Scan Peak SAR : 80.275 W/kg



1900 MHz System Validation

APPENDIX E – EUT SCAN RESULTS

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)

Left Head Cheek (835 MHz Low Channel)

Measurement Data

Test mode : GPRS
 Crest Factor : 8
 Scan Type : Complete
 Area Scan : 11x6x1: Measurement x=10mm, y=10mm, z=4mm
 Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm
 Power Drift-Start : 0.515 W/kg
 Power Drift-Finish : 0.506 W/kg
 Power Drift (%) : -1.833

Tissue Data

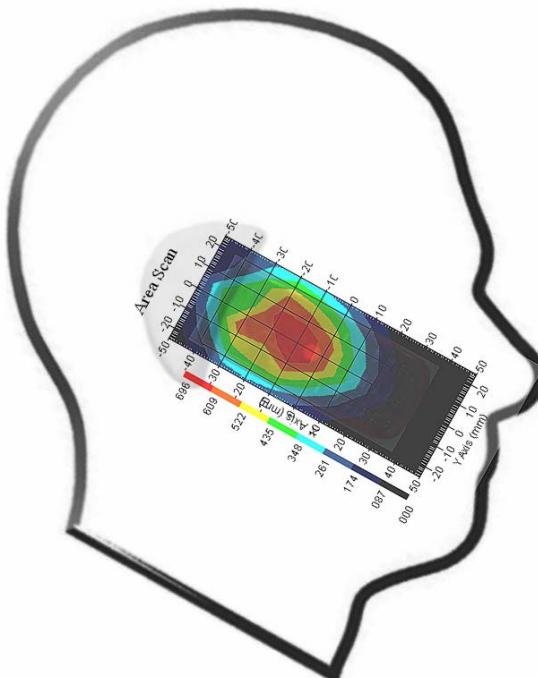
Type : HEAD
 Frequency : 835.00 MHz
 Epsilon : 41.24 F/m
 Sigma : 0.90 S/m
 Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
 Frequency : 835.00 MHz
 Duty Cycle Factor : 8
 Conversion Factor : 6.5
 Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)2
 Compression Point : 95.00 mV
 Offset : 1.56 mm

1 gram SAR value : 0.700 W/kg
 10 gram SAR value : 0.455 W/kg
 Area Scan Peak SAR : 0.695 W/kg
 Zoom Scan Peak SAR : 0.930 W/kg

Plot 1 #



Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Tilt (835 MHz Low Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.408 W/kg
Power Drift-Finish : 0.408 W/kg
Power Drift (%) : 0.916

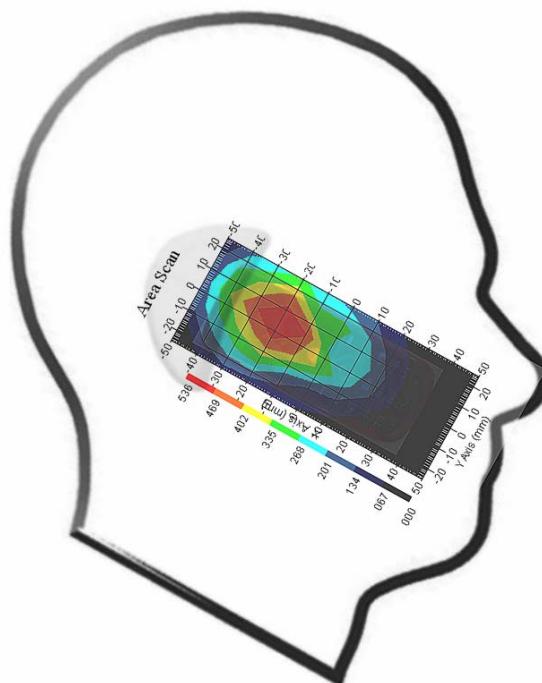
Tissue Data

Type : HEAD
Frequency : 835.00 MHz
Epsilon : 41.24 F/m
Sigma : 0.90 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 835.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 6.5
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.450 W/kg
10 gram SAR value : 0.251 W/kg
Area Scan Peak SAR : 0.536 W/kg
Zoom Scan Peak SAR : 0.750 W/kg

Plot 2 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Cheek (835 MHz Low Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.438 W/kg
Power Drift-Finish : 0.435 W/kg
Power Drift (%) : -0.739

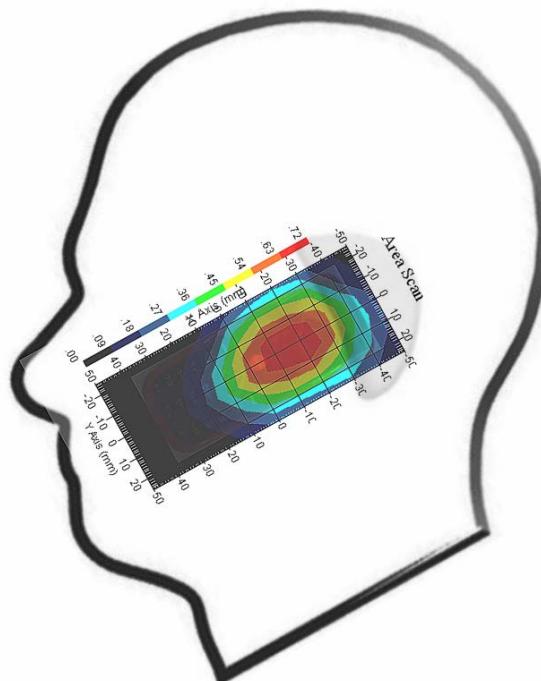
Tissue Data

Type : HEAD
Frequency : 835.00 MHz
Epsilon : 41.24 F/m
Sigma : 0.90 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 835.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 6.5
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.695 W/kg
10 gram SAR value : 0.454 W/kg
Area Scan Peak SAR : 0.716 W/kg
Zoom Scan Peak SAR : 0.920 W/kg

Plot 3 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Tilt (835 MHz Low Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.390 W/kg
Power Drift-Finish : 0.376 W/kg
Power Drift (%) : -3.766

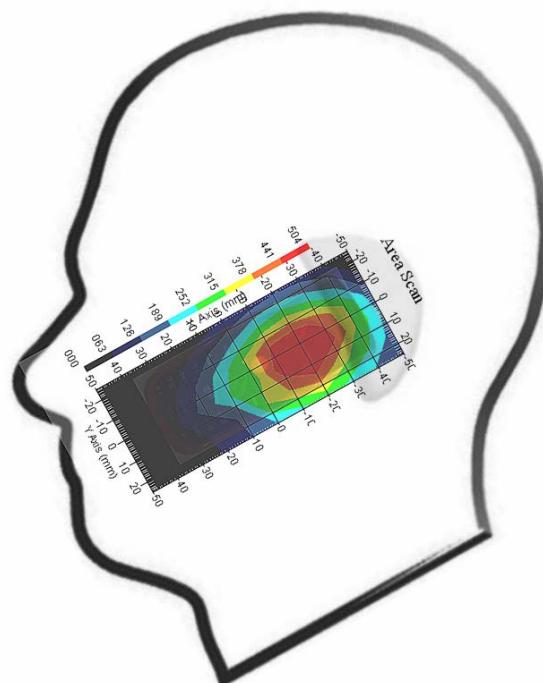
Tissue Data

Type : HEAD
Frequency : 835.00 MHz
Epsilon : 41.24 F/m
Sigma : 0.90 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 835.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 6.5
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.493 W/kg
10 gram SAR value : 0.301 W/kg
Area Scan Peak SAR : 0.501 W/kg
Zoom Scan Peak SAR : 0.790 W/kg

Plot 4 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body- worn Back (835 MHz Low Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 8
Scan Type : Complete
Area Scan : 6x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.289 W/kg
Power Drift-Finish : 0.290 W/kg
Power Drift (%) : 0.393

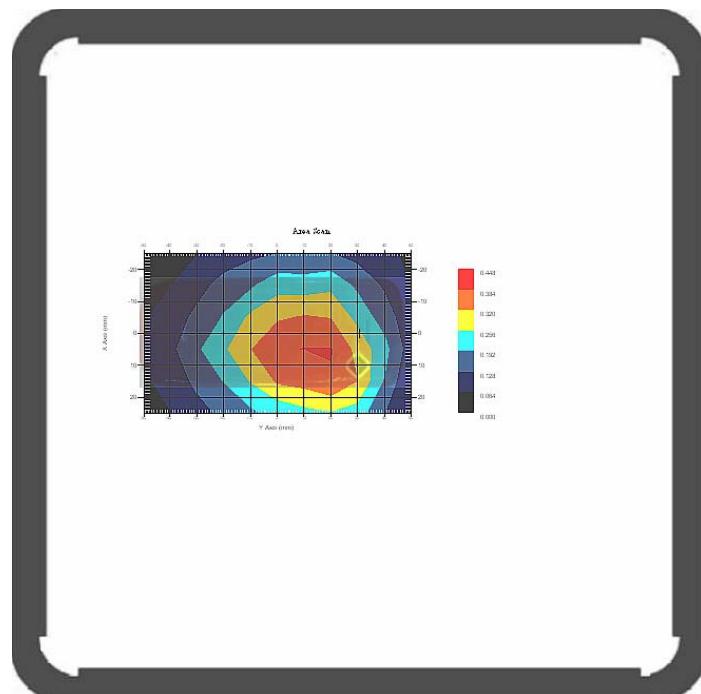
Tissue Data

Type : BODY
Frequency : 835.00 MHz
Epsilon : 55.41 F/m
Sigma : 0.98 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 835.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 6.7
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.386 W/kg
10 gram SAR value : 0.240 W/kg
Area Scan Peak SAR : 0.387 W/kg
Zoom Scan Peak SAR : 0.570 W/kg

Plot 5 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Cheek (1900 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type: : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.200 W/kg
Power Drift-Finish : 0.202 W/kg
Power Drift (%) : 1.908

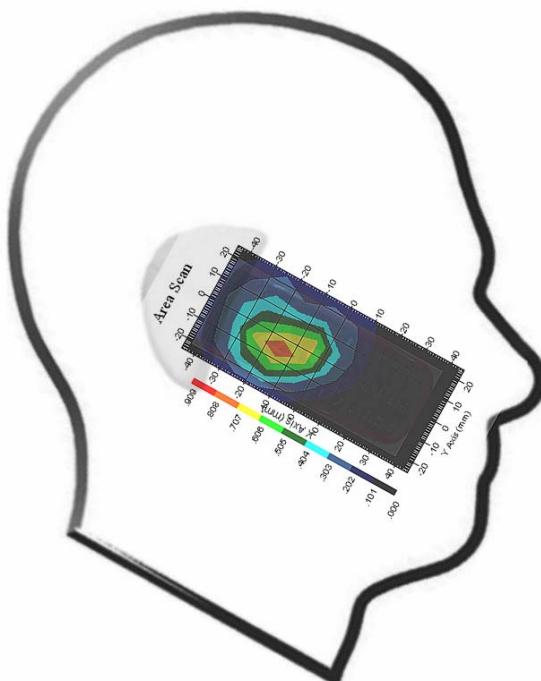
Tissue Data

Type : HEAD
Frequency : 1900.00 MHz
Epsilon : 40.27 F/m
Sigma : 1.41 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 1900.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 5.25
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.661 W/kg
10 gram SAR value : 0.333 W/kg
Area Scan Peak SAR : 0.811 W/kg
Zoom Scan Peak SAR : 1.191 W/kg

Plot 6 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Tilt (1900 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type: : Complete
Area Scan : 12x7x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.343 W/kg
Power Drift-Finish : 0.344 W/kg
Power Drift (%) : 1.290

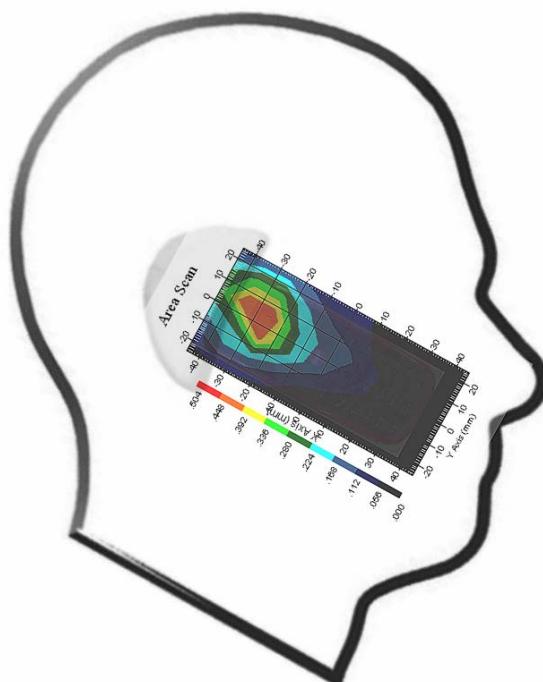
Tissue Data

Type : HEAD
Frequency : 1900.00 MHz
Epsilon : 40.27 F/m
Sigma : 1.41 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 1900.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 5.25
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.425 W/kg
10 gram SAR value : 0.206 W/kg
Area Scan Peak SAR : 0.449 W/kg
Zoom Scan Peak SAR : 0.810 W/kg

Plot 7 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Cheek (1900 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type: : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.226 W/kg
Power Drift-Finish : 0.224 W/kg
Power Drift (%) : -0.902

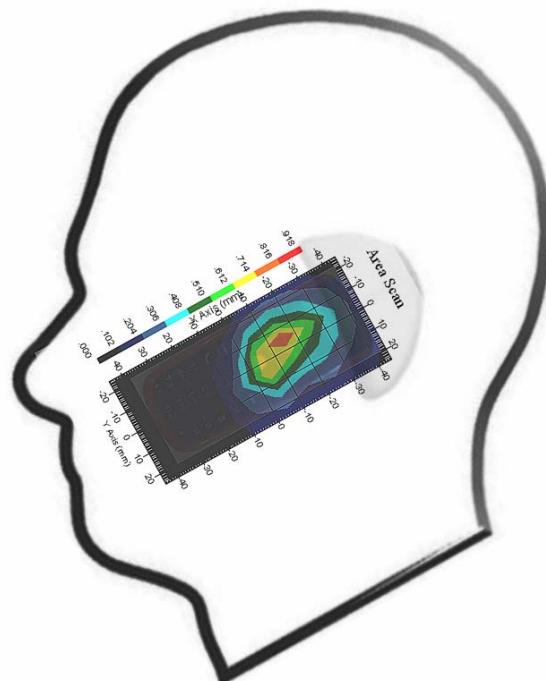
Tissue Data

Type : HEAD
Frequency : 1900.00 MHz
Epsilon : 40.27 F/m
Sigma : 1.41 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 1900.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 5.25
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.635 W/kg
10 gram SAR value : 0.326 W/kg
Area Scan Peak SAR : 0.817 W/kg
Zoom Scan Peak SAR : 1.010 W/kg

Plot 8 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Tilt (1900 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type: : Complete
Area Scan : 11x6x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.346 W/kg
Power Drift-Finish : 0.343 W/kg
Power Drift (%) : -1.109

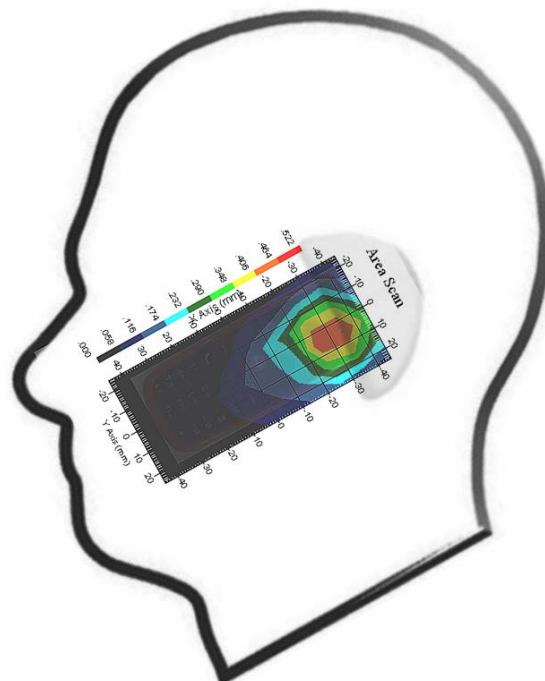
Tissue Data

Type : HEAD
Frequency : 1900.00 MHz
Epsilon : 40.27 F/m
Sigma : 1.41 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 1900.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 5.25
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.476 W/kg
10 gram SAR value : 0.223 W/kg
Area Scan Peak SAR : 0.465 W/kg
Zoom Scan Peak SAR : 1.010 W/kg

Plot 9 #

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body- worn Back (1900 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 6x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.078 W/kg
Power Drift-Finish : 0.078 W/kg
Power Drift (%) : 0.477

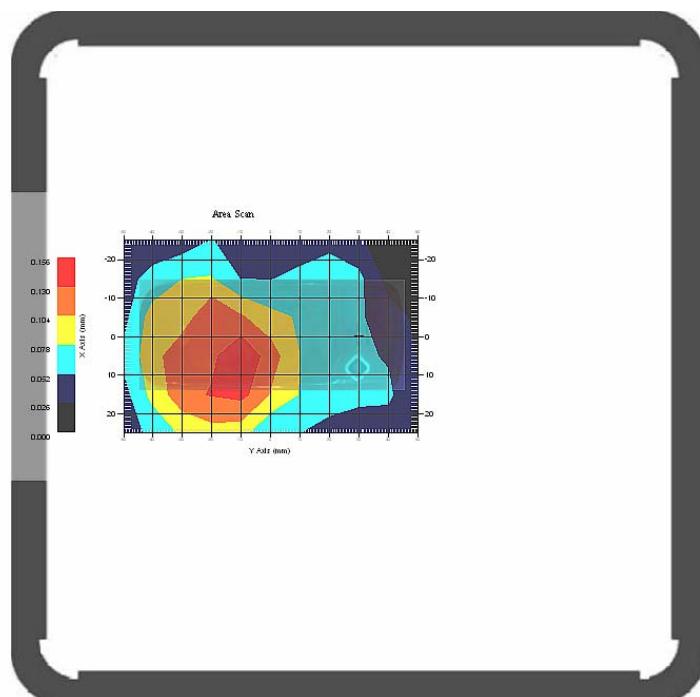
Tissue Data

Type : BODY
Frequency : 1900.00 MHz
Epsilon : 53.99 F/m
Sigma : 1.49 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 273
Frequency : 1900.00 MHz
Duty Cycle Factor : 8
Conversion Factor : 5.15
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

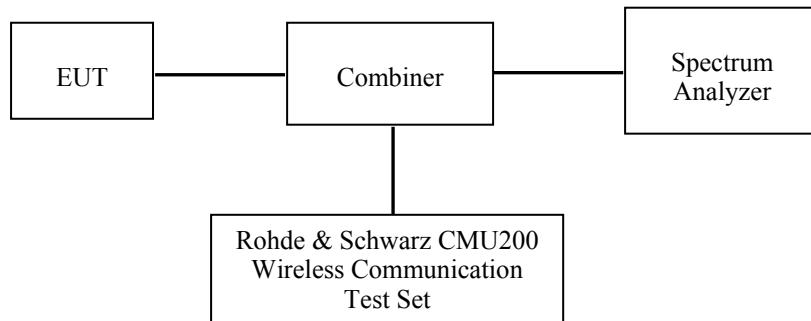
1 gram SAR value : 0.168 W/kg
10 gram SAR value : 0.180 W/kg
Area Scan Peak SAR : 0.154 W/kg
Zoom Scan Peak SAR : 0.240 W/kg

Plot 10 #

APPENDIX F – CONDUCTED OUTPUT POWER MEASUREMENT

Test Procedure

The RF output of the transmitter was connected to the input of the spectrum analyzer through sufficient attenuation.



Test Equipment List and Details

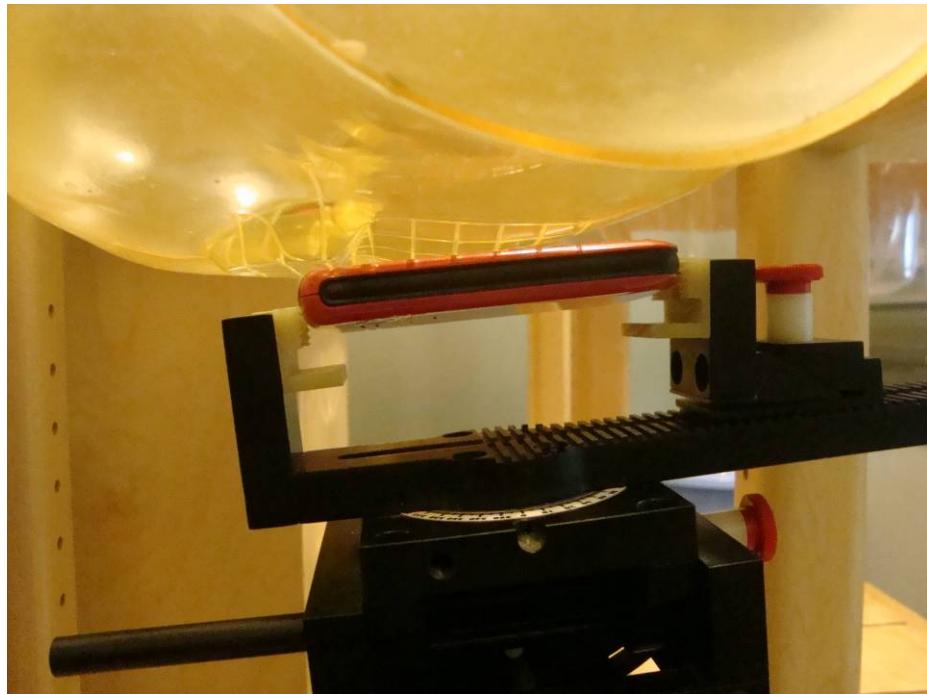
Manufacturer	Equipment Description	Model No.	Serial No.	Calibration Date
Rohde & Schwarz	Communication Tester	CMU200	1100.0008.02	2009-09-26
Rohde & Schwarz	Spectrum Analyzer	FSEM30	849720/019	2009-07-08

Test Results

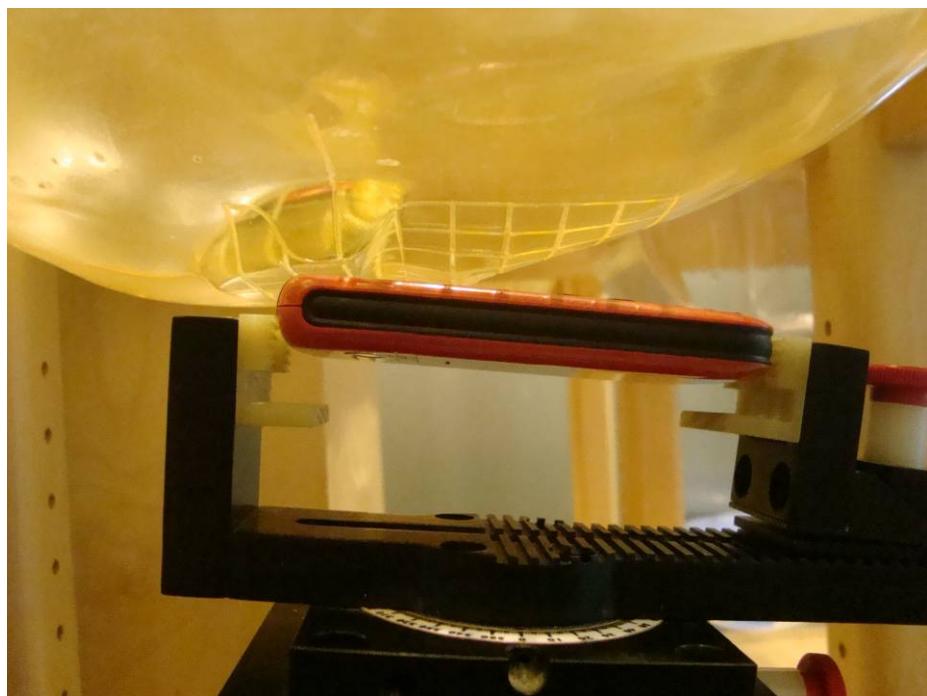
Band	Frequency (MHz)	Conducted Output Power			
		GSM (dBm)	GSM (W)	GPRS (dBm)	GPRS (W)
Cellular	824.2	32.32	1.706	32.40	1.738
	836.6	32.06	1.607	32.06	1.607
	848.8	31.79	1.510	31.83	1.524
PCS	1850.2	29.52	0.895	29.45	0.881
	1880.0	29.12	0.817	29.08	0.809
	1909.8	28.23	0.665	28.19	0.659

APPENDIX G – EUT TEST POSITION PHOTOS

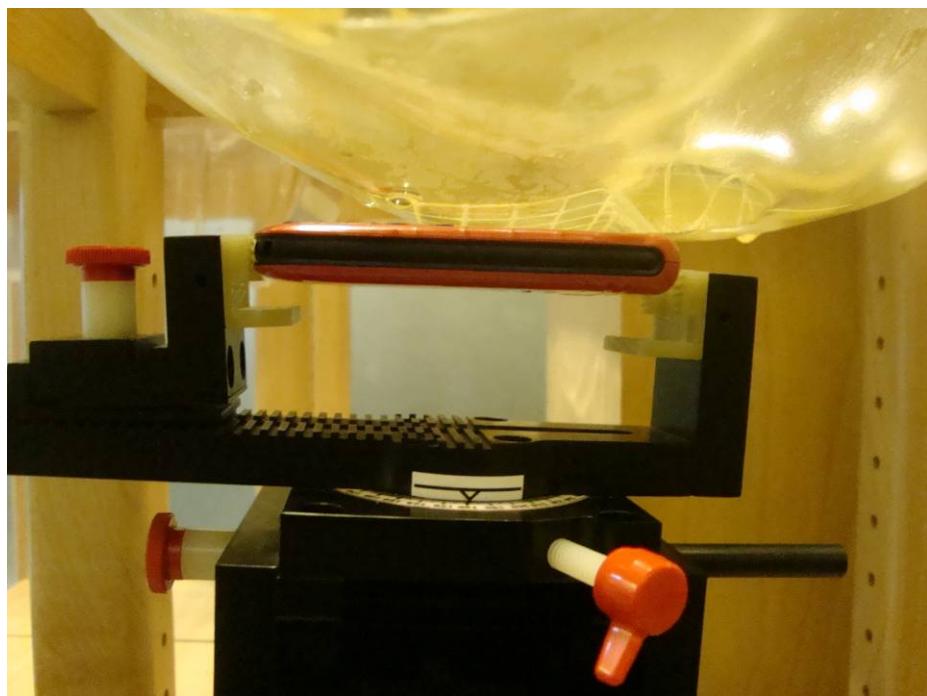
Left Head Touch Setup Photo



Left Head Tilt Setup Photo



Right Head Touch Setup Photo



Right Head Tilt Setup Photo



Body-worn Back Setup Photo



APPENDIX H – EUT PHOTOS

EUT - Top View



EUT - Bottom View



EUT- Uncover View**EUT – Side View**

EUT - Headset



APPENDIX I - INFORMATIVE REFERENCES

[1] Federal Communications Commission, 'Report and order: Guidelines for evaluating the environmental effects of radiofrequency radiation', Tech. Rep. FCC 96-326, FCC, Washington, D.C. 20554, 1996.

[2] David L. Means Kwok Chan, Robert F. Cleveland, 'Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields', Tech. Rep., Federal Communication Commission, Office of Engineering & Technology, Washington, DC, 1997.

[3] Thomas Schmid, Oliver Egger, and Niels Kuster, 'Automated E-field scanning system for dosimetric assessments', IEEE Transactions on Microwave Theory and Techniques, vol. 44, pp. 105-113, Jan. 1996.

[4] Niels Kuster, Ralph Kastle, and Thomas Schmid, 'Dosimetric evaluation of mobile communications equipment with known precision', IEICE Transactions on Communications, vol. E80-B, no. 5, pp. 645-652, May 1997.

[5] CENELEC, 'Considerations for evaluating of human exposure to electromagnetic fields (EMFs) from mobile telecommunication equipment (MTE) in the frequency range 30MHz - 6GHz', Tech. Rep., CENELEC, European Committee for Electrotechnical Standardization, Brussels, 1997.

[6] ANSI, ANSI/IEEE C95.1-1992: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992.

[7] Katja Pokovic, Thomas Schmid, and Niels Kuster, 'Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies', in ICECOM '97, Dubrovnik, October 15-17, 1997, pp. 120-24.

[8] Katja Pokovic, Thomas Schmid, and Niels Kuster, 'E-field probe with improved isotropy in brain simulating liquids', in Proceedings of the ELMAR, Zadar, Croatia, 23-25 June, 1996, pp. 172-175.

[9] Volker Hombach, Klaus Meier, Michael Burkhardt, Eberhard K. Uhn, and Niels Kuster, 'The dependence of EM energy absorption upon human head modeling at 900 MHz', IEEE Transactions on Microwave Theory and Techniques, vol. 44, no. 10, pp. 1865-1873, Oct. 1996.

[10] Klaus Meier, Ralf Kastle, Volker Hombach, Roger Tay, and Niels Kuster, 'The dependence of EM energy absorption upon human head modeling at 1800 MHz', IEEE Transactions on Microwave Theory and Techniques, Oct. 1997, in press.

[11] W. Gander, Computermathematik, Birkhaeuser, Basel, 1992.

[12] W. H. Press, S. A. Teukolsky, W. T. Vetterling, and B. P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second Edition, Cambridge University Press, 1992. Dosimetric Evaluation of Sample device, month 1998 9

[13] NIS81 NAMAS, 'The treatment of uncertainty in EMC measurement', Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddington, Middlesex, England, 1994.

[14] Barry N. Taylor and Christ E. Kuyatt, 'Guidelines for evaluating and expressing the uncertainty of NIST measurement results', Tech. Rep., National Institute of Standards and Technology, 1994. Dosimetric Evaluation of Sample device, month 1998 10.

APPENDIX J - PRODUCT SIMILAR DECLARATION LETTER



Cellon Communications Technology (Shenzhen) Co., Ltd.
13/F, Skyworth C Building, Gaoxin S.Ave1, Hi-Tech Industrial Park, Nanshan
ShenZhen 518057 China

Product Similarity Declaration

To Whom It May Concern,

We, Cellon Communications Technology (Shenzhen) Co., Ltd., hereby declare that our GSM Mobile Phone, Model Numbers: GPFM1238MT, GPFM1238TG, GPFM1238EN, GPFM1238ENR, GPFM1238ENL, GPFM1238CL, GPFE1238CA, GPFE1238MT, GPFE1238TG, GPFE1238EN, GPFE1238ENR, GPFE1238ENL, GPFE1238CL, GPFE1238CW, GPFE1238CWJ are electrically identical with the Model Number: C2011 that was certified by BACL. They are named differently due to marketing purposes. And for every model there are four trade names: Cellon, Claro, PCD, UT..

Please contact me if you have any question.

Signature: A handwritten signature in black ink, appearing to read "Tian".

Typed or Printed Name: David Tian

Title: Program director

Company Name: Cellon Communications Technology (Shenzhen) Co., Ltd.

***** END OF REPORT *****