SAR EVALUATION REPORT

For

RTX Hong Kong Ltd.

8/F Corporation Square, 8 Lam Lok Street, Kowloon Bay, Hong Kong

FCC ID: T7HCT8101

Report Type:	**Product Type:**
Original Report	DECT Handset

Test Engineer: Wilson Chen

Report Number: RSZ160118010-20A

Report Date: 2016-02-27

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SAR Engineer

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Attestation of Test Results		
EUT Information	**Company Name**	RTX Hong Kong Ltd.
	EUT Description	DECT Handset
	FCC ID	T7HCT8101
	Model Number	Tested Model

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	RSZ160118010-20A	Original Report	2016-02-27

EUT DESCRIPTION

This report has been prepared on behalf of RTX Hong Kong Ltd. and their product, FCC ID: T7HCT8101, Model: RTX8101 DECT Handset or the EUT (Equipment under Test) as referred to in the rest of this report.

Note: This series products model: 8212 DECT Handset and RTX8101 DECT Handset are identical schematics, the difference among them is just the model number due to marketing purpose, and model RTX8101 DECT Handset was selected for fully testing, the detailed information can be referred to the attached declaration letter that stated and guaranteed by the applicant.

Technical Specification

Product Type	Portable
Exposure Category:	Population / Uncontrolled
Antenna Type(s):	Internal Antenna
Body-Worn Accessories:	Headset
Face-Head Accessories:	None
Modulation:	GFSK
Frequency Band:	DECT:1921.536-1928.448 MHz;
Conducted RF Power:	DECT(average power) : 2.45 dBm
Dimensions (L*W*H):	135 mm (L)× 42 mm (W)× 25 mm (H)
Power Source:	1.2V_{DC} *2 Batteries
Normal Operation:	Head and Body-worn

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 447498 D03 Supplement C Cross-Reference v01 “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 EN62209-1 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 10 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).

General Population/Uncontrolled environments Spatial Peak limit 1.6W/kg (FCC) & 2 W/kg (CE) applied to the EUT.

FACILITIES

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

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

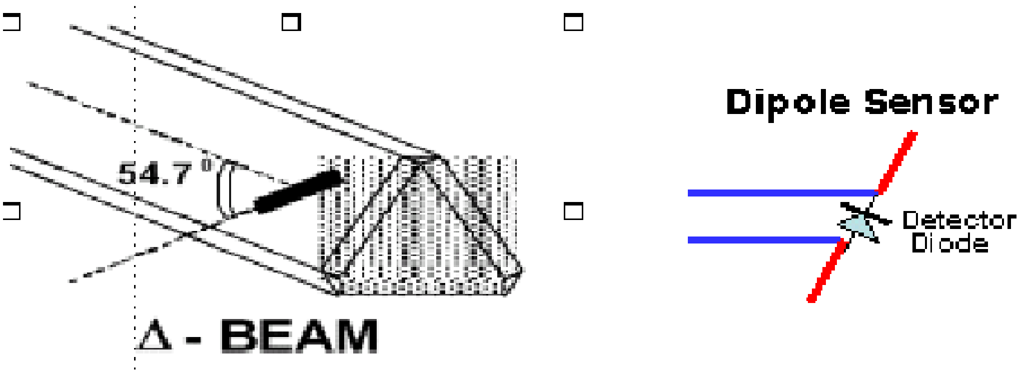
The overall uncertainty for the methodology and algorithms the used during the SAR calculation was evaluated using the data from IEEE 1528 based on the example f3 algorithm:

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

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 Method	Frequency Dependent Below 1 GHz Calibration in air performed in a TEM Cell Above 1 GHz Calibration in air performed in waveguide
Sensitivity	0.70 μV/(V/m)^2 to 0.85 μV/(V/m)^2
Dynamic Range	0.0005 W/kg to 100 W/kg
Isotropic Response	Better than 0.1 dB
Diode Compression Point (DCP)	Calibration for Specific Frequency
Probe Tip Diameter	< 2.9 mm
Sensor Offset	1.56 (+/- 0.02 mm)
Probe Length	289 mm
Video Bandwidth	@ 500 Hz: 1 dB @ 1.02 kHz: 3 dB
Boundary Effect	Less than 2.1% for distance greater than 0.58 mm
Spatial Resolution	The spatial resolution uncertainty is less than 1.5% for 4.9mm diameter probe. The spatial resolution uncertainty is less than 1.0% for 2.5mm diameter probe

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 5μV 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

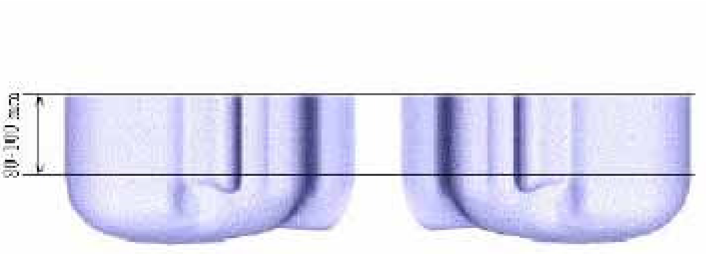
The universal device positioner allows complete freedom of movement of the EUT. Developed to hold a EUT in a free-space scenario any additional loading attributable to the material used in the construction of the positioner has been eliminated. Repeatability has been enhanced through the linear scales 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 of aid 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

Recommended Tissue Dielectric Parameters for Head and Body

Frequency (MHz)	Head Tissue		Body Tissue	
	εr	σ (S/m)	εr	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 Information

Equipment	Model	Calibration Date	Calibration Due Date	S/N
CRS F3 robot	ALS-F3	N/A	N/A	RAF0805352
CRS F3 Software	ALS-F3-SW	N/A	N/A	N/A
CRS C500C controller	ALS-C500	N/A	N/A	RCF0805379
Probe mounting device & Boundary Detection Sensor System	ALS-PMDPS-3	N/A	N/A	120-00270
Universal Work Station	ALS-UWS	N/A	N/A	100-00157
Data Acquisition Package	ALS-DAQ-PAQ-3	2015-12-14	2016-12-14	110-00212
Miniature E-Field Probe	ALS-E-020	2015-12-14	2016-12-14	500-00283
Dipole,1900MHz	ALS-D-1900-S-2	2014-10-09	2017-10-09	210-00710
Dipole Spacer	ALS-DS-U	N/A	N/A	250-00907
Device holder/Positioner	ALS-H-E-SET-2	N/A	N/A	170-00510
Left ear SAM phantom	ALS-P-SAM-L	N/A	N/A	130-00311
Right ear SAM phantom	ALS-P-SAM-R	N/A	N/A	140-00359
UniPhantom	ALS-P-UP-1	N/A	N/A	150-00413
Simulated Tissue 1900 MHz Head	ALS-TS-1900-H	Each Time	/	295-01103
Simulated Tissue 1900 MHz Body	ALS-TS-1900-B	Each Time	/	295-02102
Power Amplifier	5S1G4	N/A	N/A	71377
Directional couple	DC6180A	N/A	N/A	0325849
Attenuator	3dB	N/A	N/A	5402
Network analyzer	8752C	2015-06-03	2016-06-03	3410A02356
Dielectric probe kit	HP85070B	2015-06-03	2016-06-03	US33020324
Synthesized Sweeper	HP 8341B	2015-06-03	2016-06-03	2624A00116
Rohde & Schwarz Digital Radio communication Tester	CMD60	2015-11-23	2016-11-23	106891
EMI Test Receiver	ESCI	2015-06-13	2016-06-13	101746

SAR MEASUREMENT SYSTEM VERIFICATION

Liquid Verification

Liquid Verification Setup Block Diagram

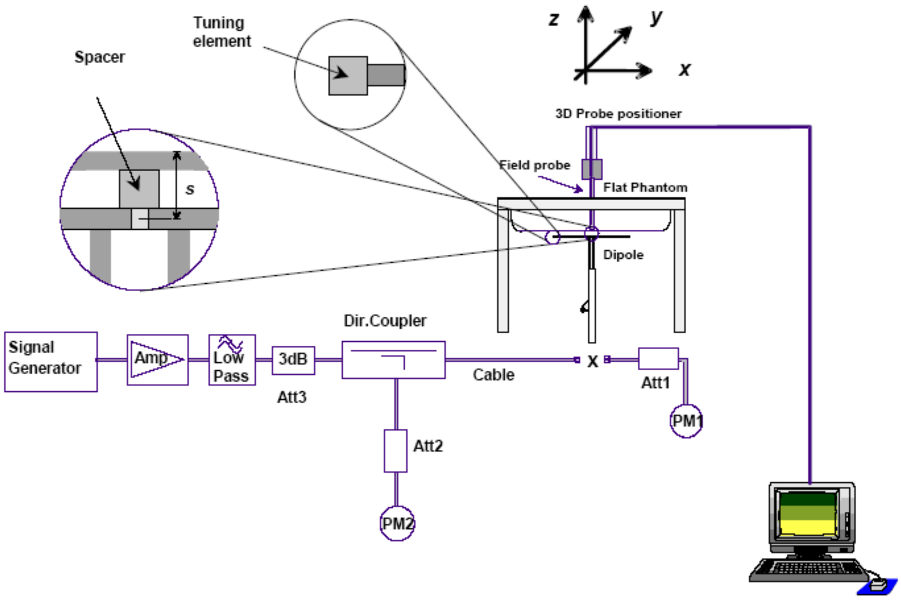
Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ε_r	Ơ (S/m)	ε_r	Ơ (S/m)			

System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of ±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



Probe and dipole antenna List and Detail

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
APREL	Probe	ALS-E-020	500-00283	2015-12-14	2016-12-14
APREL	Dipole antenna(1900MHz)	ALS-D-1900-S-2	210-00710	2014-10-09	2017-10-09

System Accuracy Check Results

Date	Frequency Band	Liquid Type	Measured SAR (W/Kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2016-01-25	1900	Head	1g	40.833	39.481	3.424	±10
		Body	1g	40.082	39.715	0.924	±10

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

SAR SYSTEM VALIDATION DATA

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 Band : 1900
Max. Transmit Pwr : 1 W
Drift Time : 3 min(s)
Power Drift-Start : 39.226 W/kg
Power Drift-Finish : 39.886 W/kg
Power Drift (%) : 1.509

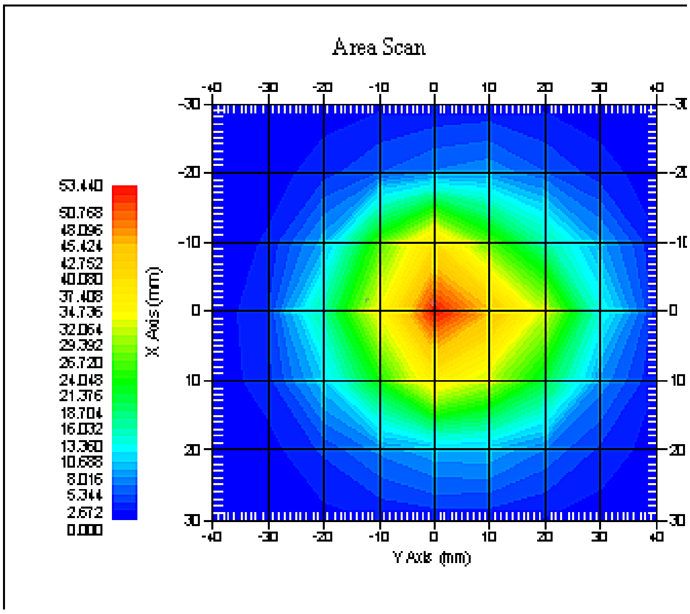
Phantom Data
Name : APREL-Uni
Type : Uni-Phantom
Serial No. : System Default
Location : Center
Description : Default

Tissue Data
Type : Head
Serial No. : 295-01103
Frequency : 1900.00 MHz
Last Calib. Date : 25-Jan-2016
Temperature : 20.00 °C
Ambient Temp. : 21.00 °C
Humidity : 56.00 RH%
Epsilon : 40.36 F/m
Sigma : 1.38 S/m
Density : 1000.00 kg/cu. M

Probe Data
Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 500-00283
Last Calib. Date : 14-Dec-2015
Frequency Band : 1900
Duty Cycle Factor : 1
Conversion Factor : 4.8
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. : 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	: 40.833 W/kg
10 gram SAR value	: 20.406 W/kg
Area Scan Peak SAR	: 52.308 W/kg
Zoom Scan Peak SAR	: 67.272 W/kg



1900 MHz System Validation with Head Tissue

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

System Performance Check 1900 MHz Body 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 Band	: 1900
Max. Transmit Pwr	: 1 W
Drift Time	: 3 min(s)
Power Drift-Start	: 40.383 W/kg
Power Drift-Finish	: 40.752 W/kg
Power Drift (%)	: 0.914

Phantom Data

Name	: APREL-Uni
Type	: Uni-Phantom
Serial No.	: System Default
Location	: Center
Description	: Default

Tissue Data

Type	: Body
Serial No.	: 295-02102
Frequency	: 1900.00 MHz
Last Calib. Date	: 25-Jan-2016
Temperature	: 20.00 °C
Ambient Temp.	: 21.00 °C
Humidity	: 56.00 RH%
Epsilon	: 51.77 F/m
Sigma	: 1.53 S/m
Density	: 1000.00 kg/cu. m

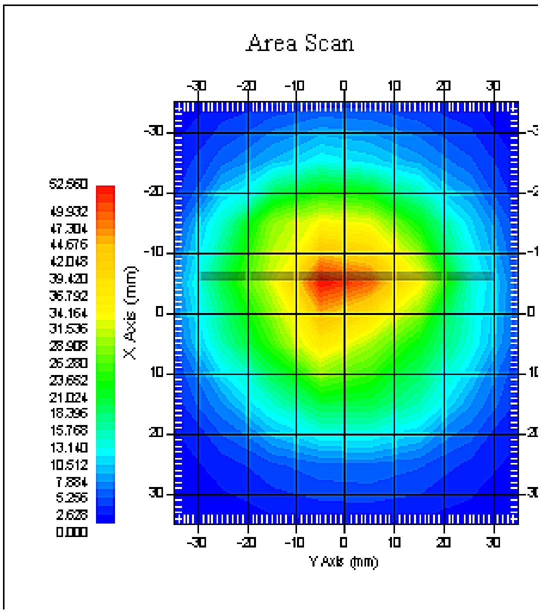
Probe Data

Name	: E-Field
Model	: E-020
Type	: E-Field Triangle
Serial No.	: 500-00283
Last Calib. Date	: 14-Oct-2014
Frequency Band	: 1900
Duty Cycle Factor	: 1
Conversion Factor	: 4.5
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.	: 20.00 °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	: 40.082 W/kg
10 gram SAR value	: 21.347 W/kg
Area Scan Peak SAR	: 51.762 W/kg
Zoom Scan Peak SAR	: 73.563 W/kg



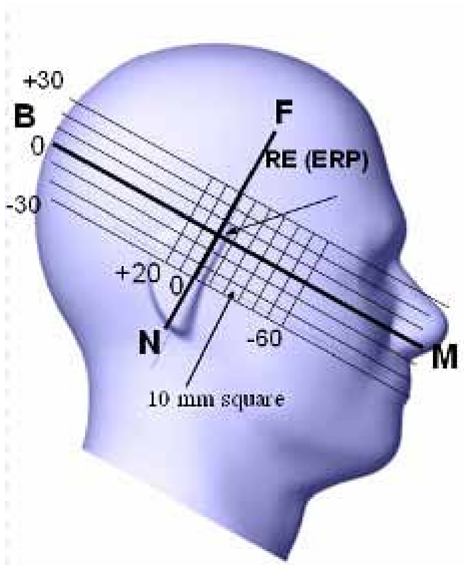
1900 MHz System Validation with Body Tissue

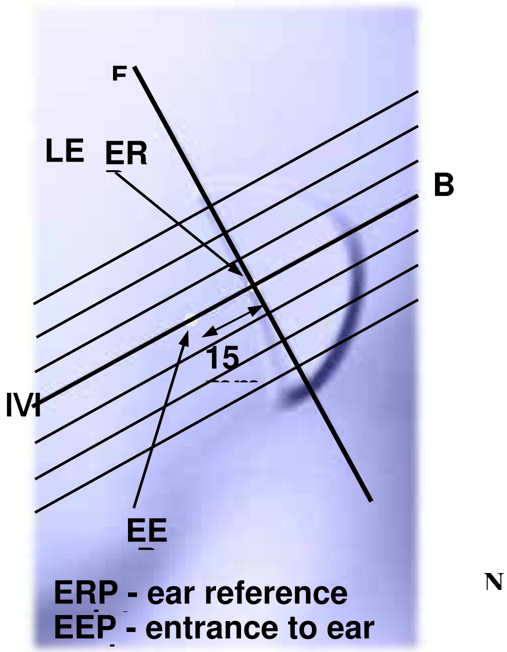
RATEGY AND METHODOLOGY

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 ¼ 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

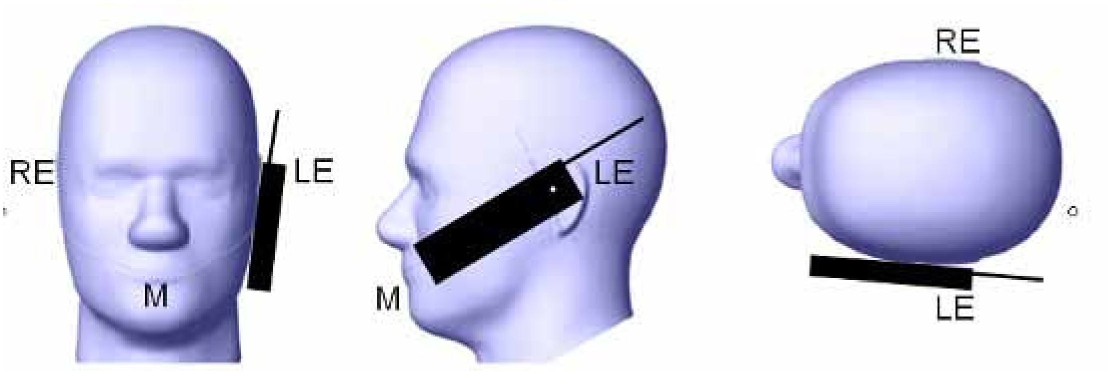
The device is brought toward the mouth of the head phantom by pivoting against the "ear reference point" or along the "N-F" line for the SCC-34/SC-2 head phantom.

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

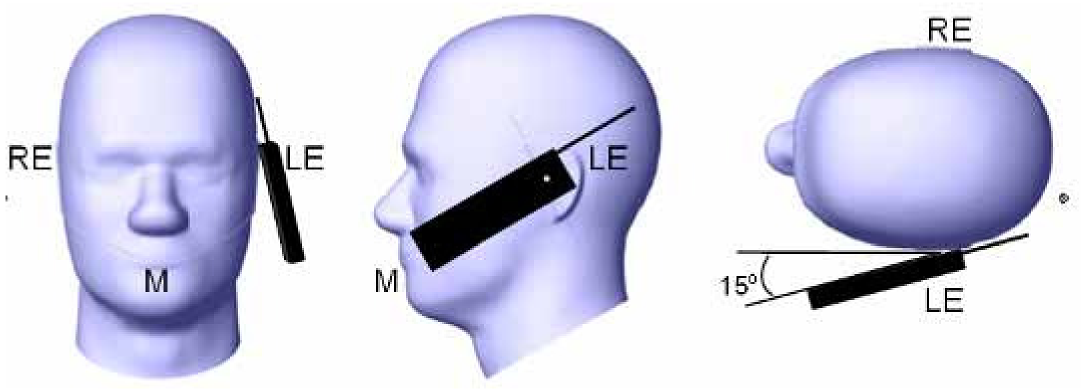
With the handset aligned in the "Cheek/Touch Position":

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 isby 15 80°. 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, Tile/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.

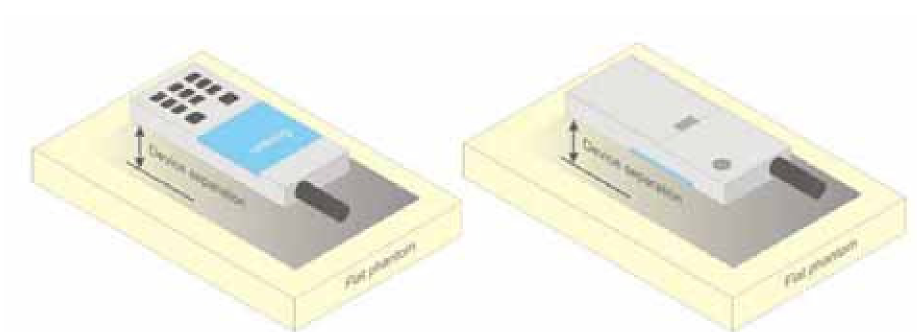


Figure 5 – Test positions for body-worn devices

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 10 mm x 10 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 35 mm x 35 mm x 35 mm was assessed by measuring 7x 7 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.

Test methodology

IEEE1528:2013
KDB 447498 D01 General RF Exposure Guidance v06.
KDB 648474 D04 Handset SAR v01r03.
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02 RF Exposure Reporting v01r02

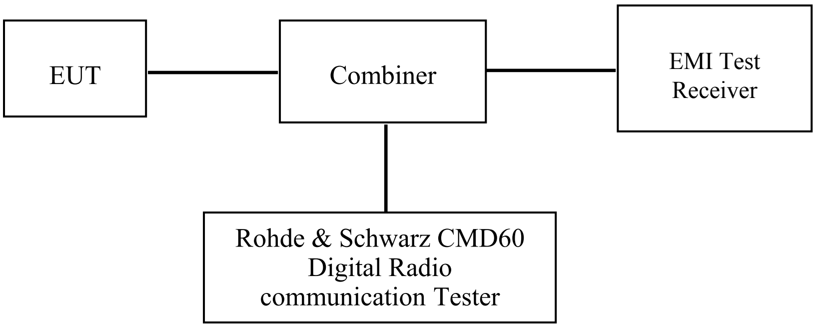
CONDUCTED OUTPUT POWER MEASUREMENT

Provision Applicable

The measured peak output power should be greater and within 5% than EMI measurement.

Test Procedure

The RF output of the transmitter was connected to the input of the EMI Test Receiver through sufficient attenuation.



Test Results:

Mode	Frequency (MHz)	Conducted Output Power			
		Peak	Average		
		(dBm)	(dBm)	(mW)	Turn-up Limit (dBm)
GFSK	1921.536	20.04	**2.45**	3.886	2.50
	1924.992	19.97	2.41	3.823	2.50
	1928.448	19.91	2.38	3.771	2.50

Note:

1. Rohde & Schwarz Radio Communication Tester (CMD60) was used for the measurement of DECT peak output power.

2. Duty Cycle=T_{on}/T_p*100%
   Ton = 387 µs, Tp= 10.05 ms
   T_p=Duty Cycle=3.85%

3. The EUT belongs to a low duty cycle device.

SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

SAR Test Data

Environmental Conditions

Temperature:	21-24

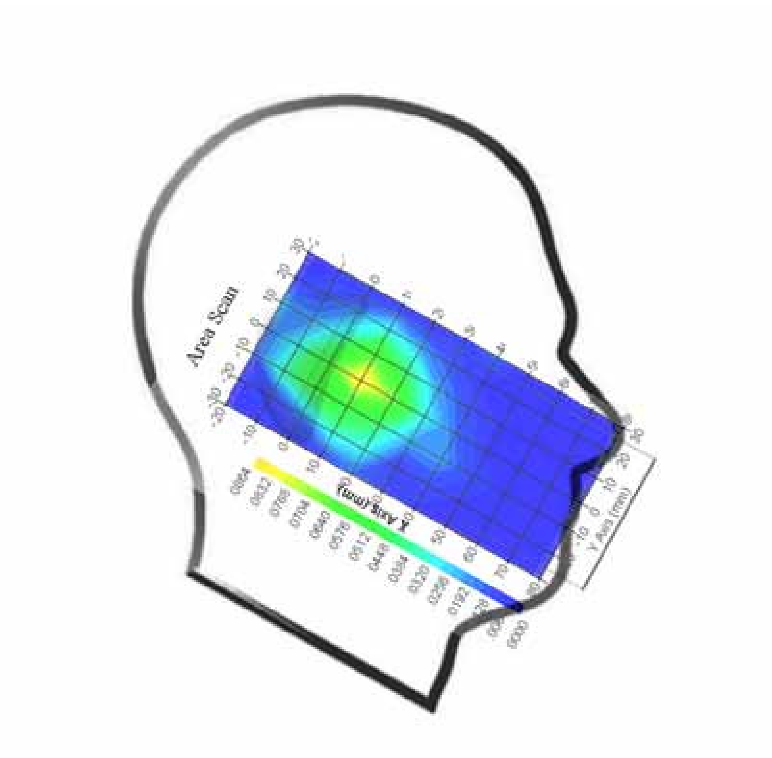
SAR Plots (Summary of the Highest SAR Values)

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

Left Head Cheek (1924.992 MHz Middle Channel);

Measurement Data	
Crest Factor	: 24
Scan Type	: Complete
Area Scan	: 11x7x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan	: 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start	: 0.066 W/kg
Power Drift-Finish	: 0.065 W/kg
Power Drift (%)	: -1.531
Tissue Data	
Type	: Head
Frequency	: 1924.992 MHz
Epsilon	: 39.76 F/m
Sigma	: 1.41 S/m
Density	: 1000.00 kg/cu. m
Probe Data	
Serial No.	: 500-00283
Frequency Band	: 1900
Duty Cycle Factor	: 24
Conversion Factor	: 4.8
Probe Sensitivity	: 1.20 1.20 1.20 µV/(V/m)2
Compression Point	: 95.00 mV
Offset	: 1.56 mm
1 gram SAR value	: 0.075 W/kg
10 gram SAR value	: 0.046 W/kg
Area Scan Peak SAR	: 0.086 W/kg
Zoom Scan Peak SAR	: 0.137 W/kg

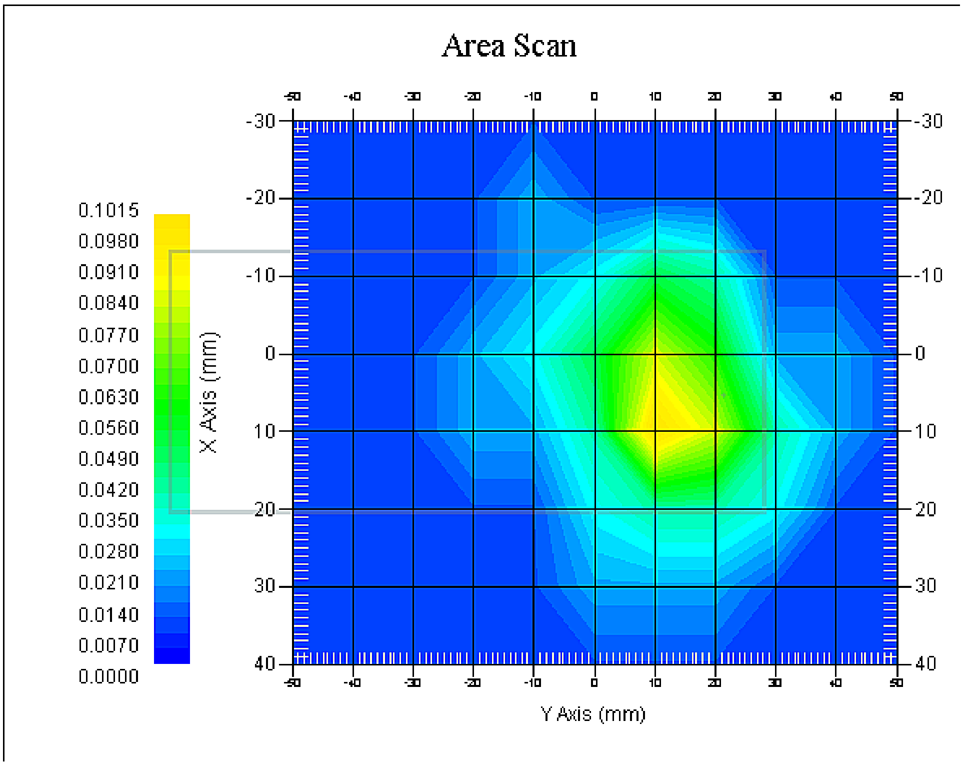
Plot 1#



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

Body-Worn-Back-Headset (1924.992 MHz Middle Channel);

Measurement Data
Crest Factor : 24
Scan Type



APPENDIX A MEASUREMENT UNCERTAINTY

According to **IEEE1528:2013**, the uncertainty budget has been determined for the Head SAR measurement system and is given in the following Table.

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	$\sqrt{3}$	$(1\text{-cp})^{1/2}$	$(1\text{-cp})^{1/2}$	1.5	1.5
Hemispherical Isotropy	10.9	rectangular	$\sqrt{3}$	√cp	√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 -Noise	0.6	rectangular	$\sqrt{3}$	1	1	0.3	0.3
RF Ambient Condition - Reflections	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech. Restrictions	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
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 related							
Test sample positioning	2.0	normal	1	1	1	2.0	2.0
Device Holder Uncertainty	4.0	normal	1	1	1	6.215	6.215
Drift of Output Power	5.0	rectangular	$\sqrt{3}$	1	1	2.67	2.67
Phantom and Setup							
Phantom Uncertainty	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
SAR correction in permittivity and conductivity	1.2	normal	1	1	0.85	1.2	1.0
Liquid conductivity measurement	5.0	normal	1	0.78	0.71	3.9	3.6
Liquid permittivity measurement	5.0	normal	1	0.25	0.29	1.3	1.5
conductivity—temperature	1.1	rectangular	$\sqrt{3}$	0.78	0.71	0.5	0.5
permittivity—temperature	1.3	rectangular	$\sqrt{3}$	0.23	0.23	0.2	0.2
Combined Uncertainty		RSS				10.78	10.55
Expanded uncertainty (coverage factor=2)		Normal(k=2)				21.56	21.10

According to **IEC62209-2:2010**, the uncertainty budget has been determined for the Body SAR measurement system and is given in the following Table.

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	1	1.5	1.5
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 -Noise	0.6	rectangular	$\sqrt{3}$	1	1	0.3	0.3
RF Ambient Condition - Reflections	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech. Restrictions	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
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 related							
Test sample positioning	2.0	normal	1	1	1	2.0	2.0
Device Holder Uncertainty	4.0	normal	1	1	1	6.215	6.215
Drift of Output Power	5.0	rectangular	$\sqrt{3}$	1	1	2.67	2.67
Phantom and Setup							
Phantom Uncertainty	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
SAR correction in permittivity and conductivity	1.2	normal	1	1	0.84	1.2	1.0
Liquid conductivity measurement	5.0	normal	1	0.78	0.71	3.9	3.6
Liquid permittivity measurement	5.0	normal	1	0.23	0.26	1.3	1.5
conductivity—temperature	1.1	rectangular	$\sqrt{3}$	0.78	0.71	0.5	0.5
permittivity—temperature	1.3	rectangular	$\sqrt{3}$	0.23	0.26	0.2	0.2
Combined Uncertainty		RSS				9.58	9.49
Expanded uncertainty (coverage factor=2)		Normal(k=2)				19.16	18.98

APPENDIX B – PROBE CALIBRATION CERTIFICATES

NCL CALIBRATION LABORATORIES

Calibration File No.: PC-1654

Task No: BACL-5805

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
Record of Calibration
Head and Body
Manufacturer: APREL Inc.
Model No.: ALS-E020
Serial No.: 500-00283

Calibration Procedure: D01-032-E020-V2, D22-012-Tissue, D28-002-Dipole
Project No: BACL-5805

Calibrated: 12th December 2015
Released on: 14th December 2015

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

Released By: ______________________

Art Brennan, Quality Manager

NCL CALIBRATION LABORATORIES

Suite 102, 303 Terry Fox Dr,
OTTAWA, ONTARIO
CANADA K2K 3J1

Division of APREL Lab.
TEL: (613) 435-8300
FAX: (613) 435-8306

NCL Calibration Laboratories
Division of APREL Inc.

Introduction

This Calibration Report reproduces the results of the calibration performed in line with the references listed below. Calibration is performed using accepted methodologies as per the references listed below. Probes are calibrated for air, and tissue and the values reported are the results from the physical quantification.

Calibration Method

Probes are calibrated using the following methods.

<800 MHz
TEM Cell for sensitivity in air
Standard phantom using temperature transfer method for sensitivity in tissue

>800 MHz
Waveguide* method to determine sensitivity in air and tissue
*Waveguide is numerically (simulation) assessed to determine the field distribution and power

The boundary effect for the probe is assessed using a standard flat phantom where the probe output is compared against a numerically simulated series of data points

References

- IEEE Standard 1528:2013
  IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
- IEC 62209-1:2006
  Human Exposure to RF Fields from hand-held and body-mounted wireless communication devices - Human models. instrumentation, and procedures - Part 1: Procedure to measure the Specific Absorption Rate (SAR) for hand-held mobile wireless devices
- IEC 62209-2:2010
  Human exposure to RF fields from hand-held and body-mounted wireless devices - Human models, instrumentation, and procedures - Part 2: specific absorption rate (SAR) for wireless communication devices (30 MHz - 6 GHz)
- TP-D01-032-E020-V2 E-Field probe calibration procedure
- D22-012-Tissue dielectric tissue calibration procedure
- D28-002-Dipole procedure for validation of SAR system using a dipole
- IEEE 1309 Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas, from 9kHz to 40GHz

Conditions

Probe 500-00283 was a recalibration.

Ambient Temperature of the Laboratory:	20 °C +/- 1.5°C
Temperature of the Tissue:	21 °C +/- 1.5°C
Relative Humidity:	< 60%

Primary Measurement Standards

Instrument	Serial Number	Cal due date
Power Meter Tektronix USB	11C940	Apr 2, 2017
Signal Generator Agilent E4438C	MY45094463	Dec 11, 2017

Secondary Measurement Standards

Network Analyzer Anritsu 37347C	002106	Feb. 4, 2017

Attestation

The below named signatories have conducted the calibration and review of the data which is presented in this calibration report.

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

Art Brennan, Quality Manager

Dan Brooks, Test Engineer

NCL Calibration Laboratories
Division of APREL Inc.

Probe Summary

Probe Type: E-Field Probe E-020

Serial Number: 500-00283

Frequency: As presented on page 5

Sensor Offset: 1.56

Sensor Length: 2.5

Tip Enclosure: Composite*

Tip Diameter: < 2.9 mm

Tip Length: 55 mm

Total Length: 289 mm

Diode Compression Point: 95 mV

Sensitivity in Air

Frequency Range	Channel X, μV/(V/m)^2	Channel Y, μV/(V/m)^2	Channel Z, μV/(V/m)^2	Tolerance, μV/(V/m)^2
450 MHz	1.212	1.205	1.199	±0.004
750 MHz, 835 MHz 900 MHz	1.212	1.21	1.209	±0.004
1 GHz – 4 GHz	1.21	1.21	1.207	±0.004
5 GHz – 6 GHz	1.2	1.192	1.19	±0.005

*Resistive to recommended tissue recipes per IEEE-1528

Page 4 of 10 Probe S/N 500-00283
This page has been reviewed for content and attested to on Page 2 of this document.

NCL Calibration Laboratories
Division of APREL Inc.

Calibration for Tissue (Head H, Body B)

Frequency	Tissue Type	Measured Epsilon	Measured Sigma	Standard Uncertainty (%)	Calibration Frequency Range (MHz)	Conversion Factor
450 H	Head	43.5	0.84	3.5	±50	5.7
450 B	Body	56.77	0.93	3.5	±50	5.8
750 H	Head	42.92	0.92	3.5	±50	6.0
750 B	Body	55.57	0.93	3.5	±50	5.9
835 H	Head	43.44	0.94	3.5	±50	5.9
835 B	Body	54.91	1.00	3.5	±50	5.9
900 H	Head	41.05	1.01	3.5	±50	6.0
900 B	Body	54.86	1.04	3.5	±50	5.9
1450 H	Head	X	X	X	X	X
1450 B	Body	X	X	X	X	X
1500 H	Head	X	X	X	X	X
1500 B	Body	X	X	X	X	X
1640 H	Head	X	X	X	X	X
1640 B	Body	X	X	X	X	X
1750 H	Head	38.58	1.36	3.5	±75	5.4
1750 B	Body	51.5	1.52	3.5	±75	5.3
1800 H	Head	X	X	X	X	X
1800 B	Body	X	X	X	X	X
1900 H	Head	40.72	1.37	3.5	±75	4.8
1900 B	Body	52.29	1.58	3.5	±75	4.8
2000 H	Head	X	X	X	X	X
2000 B	Body	X	X	X	X	X
2100 H	Head	X	X	X	X	X
2100 B	Body	X	X	X	X	X
2300 H	Head	X	X	X	X	X
2300 B	Body	X	X	X	X	X
2450 H	Head	37.35	1.85	3.5	±75	4.8
2450B	Body	53.26	1.96	3.5	±75	4.3
3000 H	Head	X	X	X	X	X
3000 B	Body	X	X	X	X	X
3600 H	Head	37.24	3.14	3.5	±100	4.4
3600 B	Body	50.23	3.81	3.5	±100	4.1
5250 H	Head	35.05	4.65	3.5	±100	3.1
5250 B	Body	46.24	5.11	3.5	±100	2.9
5600 H	Head	34.95	5.06	3.5	±100	3.0
5600 B	Body	45.95	5.73	3.5	±100	2.4
5800 H	Head	34.57	5.27	3.5	±100	3.1
5800 B	Body	46.01	6.10	3.5	±100	2.6

Page 5 of 10 Probe S/N 500-00283
This page has been reviewed for content and attested to on Page 2 of this document.

Boundary Effect:

Uncertainty resulting from the boundary effect is less than 2.1% for the distance between the tip of the probe and the tissue boundary, when less than 0.58mm.

Spatial Resolution:

The spatial resolution uncertainty is less than 1.5% for 4.9mm diameter probe.
The spatial resolution uncertainty is less than 1.0% for 2.5mm diameter probe.

DAQ-PAQ Contribution

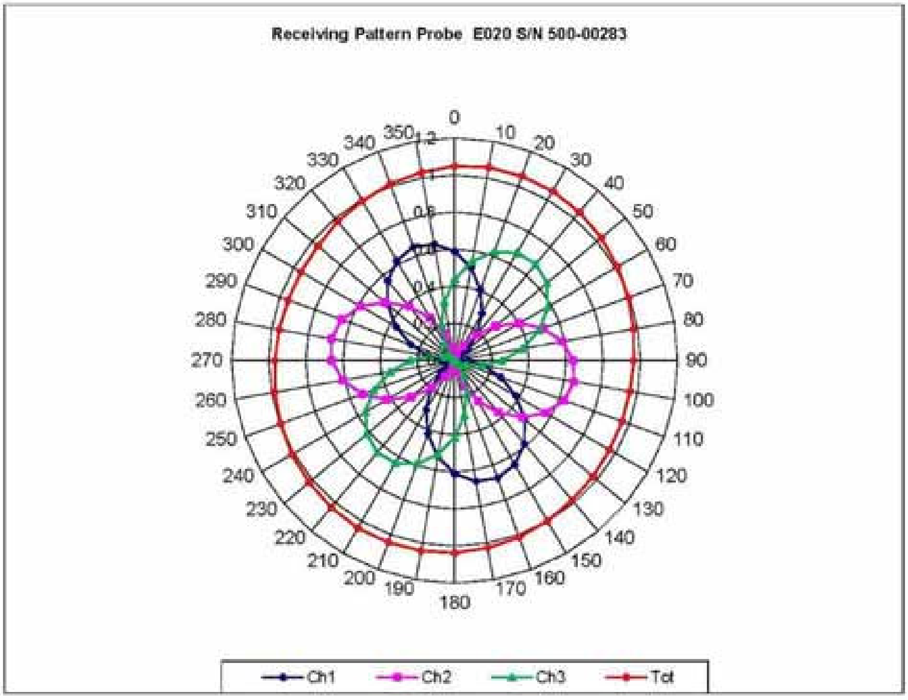
To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

Probe Calibration Uncertainty

Uncertainty component	Tolerance (± %)	Probability distribution	Divisor	Standard uncertainty (± %)
Incident or forward power	2.5	R	√3	1.44
Reflected power	2	R	√3	1.15
Liquid conductivity measurement	1	R	√3	0.58
Liquid permittivity measurement	1	R	√3	0.58
Liquid conductivity deviation	1.5	R	√3	0.87
Liquid permittivity deviation	1.5	R	√3	0.87
Frequency deviation	2.25	R	√3	1.30
Field homogeneity	2.5	R	√3	1.44
Field-probe positioning	2.5	R	√3	1.44
Field-probe linearity	1.55	R	√3	0.89
Combined standard uncertainty		RSS		**3.50**

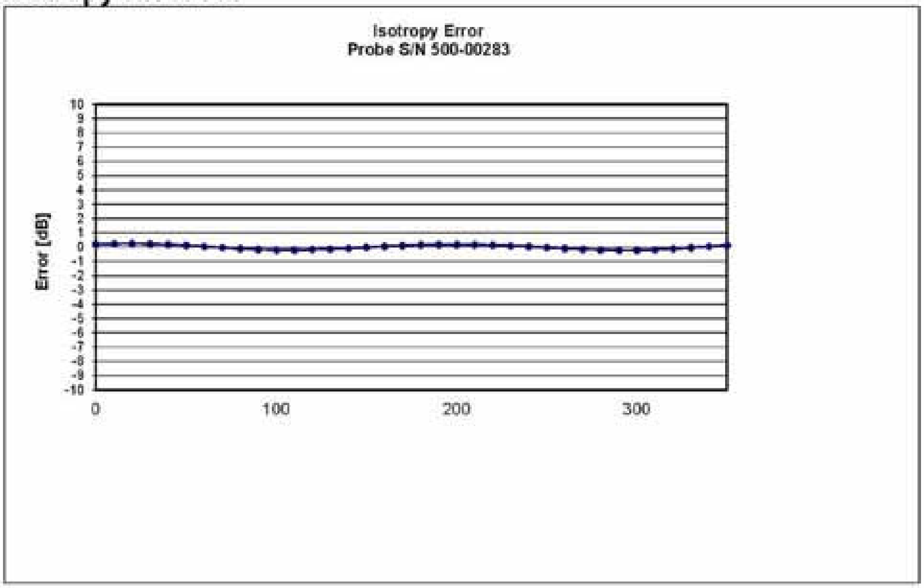
NCL Calibration Laboratories
Division of APREL Inc.

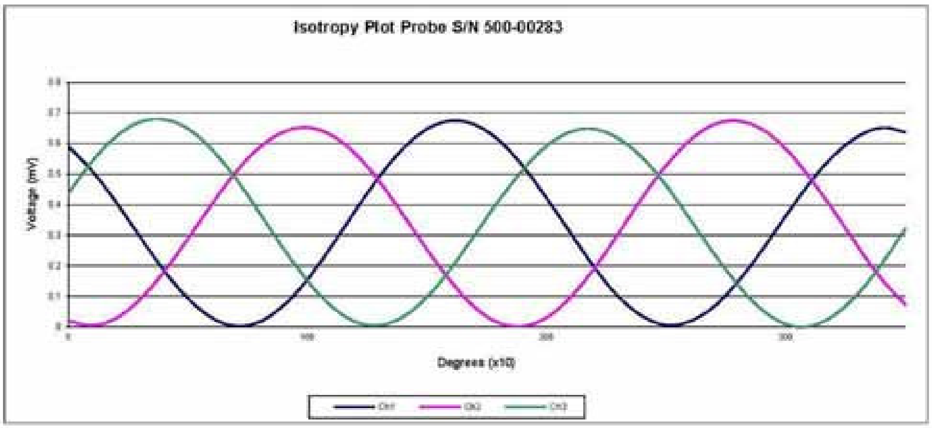
Receiving Pattern Air



Page 7 of 10 Probe S/N 500-00283
This page has been reviewed for content and attested to on Page 2 of this document.

Isotropy Error Air





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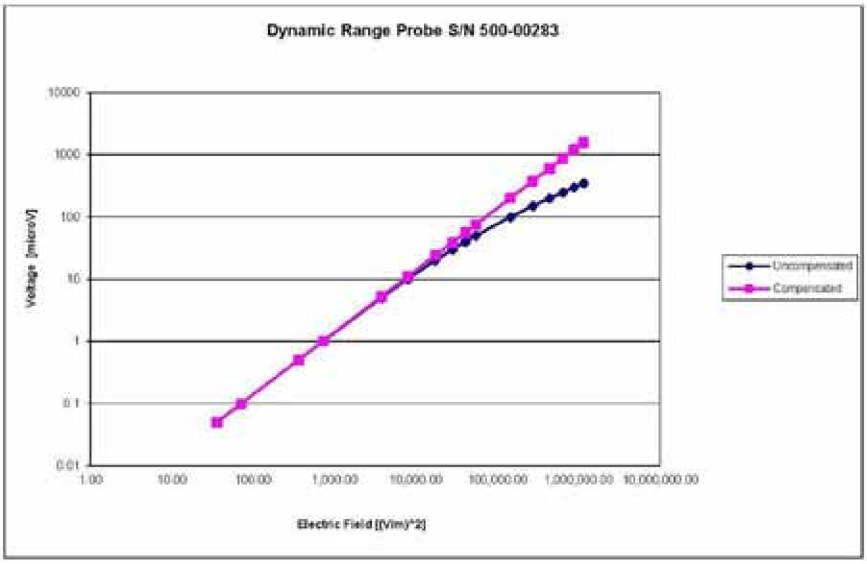
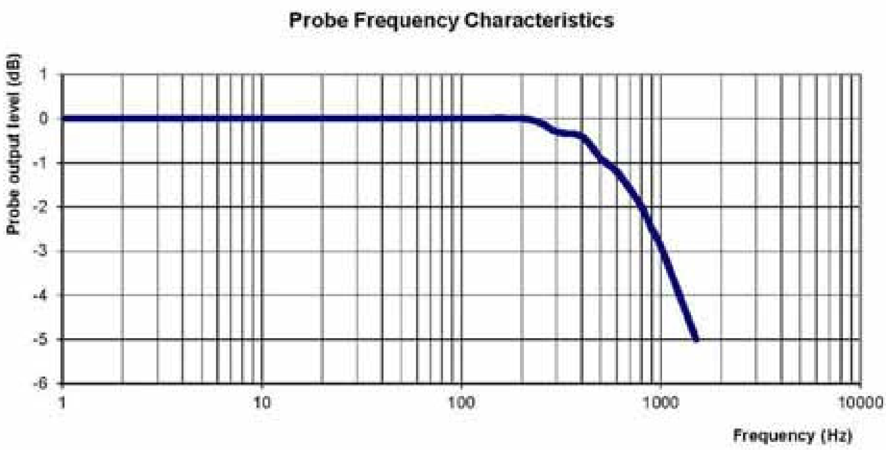
Dynamic Range



Video Bandwidth



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

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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-1601
Project Number: BAC-dipole –cal-5779

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.

Validation Dipole (Head & Body)

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

Customer: Bay Area Compliance Laboratory (China)

Calibrated: 9th October, 2014
Released on: 9th October, 2014

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

Released By: ______________________

Art Brennan, Quality Manager

NCL CALIBRATION LABORATORIES

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Division of APREL Lab.
TEL: (613) 435-8300
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Division of APREL Laboratories.

Conditions

Dipole 210-00710 was received in good condition and was a re-calibration.

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

Attestation

The below named signatories have conducted the calibration and review of the data which is presented in this calibration report.

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

Art Brennan, Quality Manager

Maryna Nesterova Calibration Engineer

Primary Measurement Standards

Instrument	Serial Number	Cal due date
Tektronix USB Power Meter	11C940	May 14, 2015
Network Analyzer Anritsu 37347C	002106	Feb. 20, 2015

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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

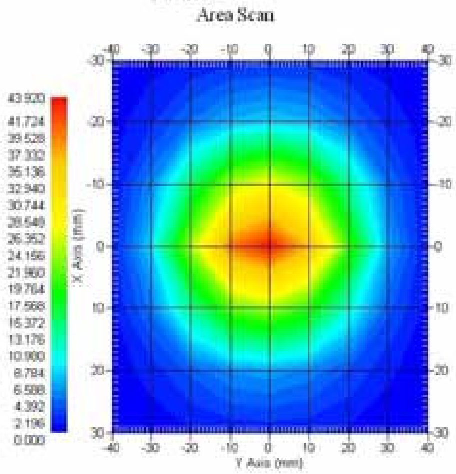
Electrical Specification

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	1900MHz	1.084 U	-27.92 dB	52.247 Ω
Body	1900MHz	1.128 U	-24.40 dB	52.618 Ω

System Validation Results

Tissue	Frequency	1 Gram	10 Gram	Peak
Head	1900 MHz	39.481	20.44	73.364
Body	1900 MHz	39.715	20.552	73.565

Head



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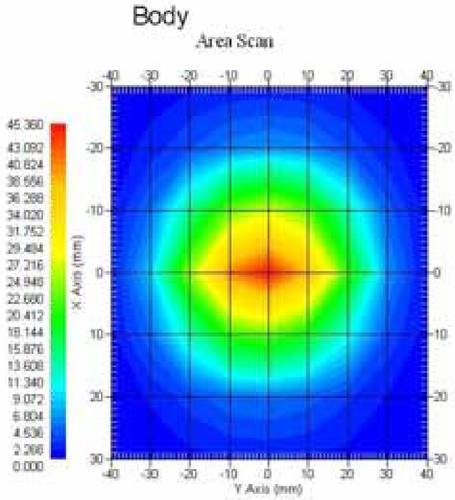

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Introduction

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 30 MHz to 6 GHz E-Field Probe Serial Number 225.

References

- IEC-62209 “Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Human models, instrumentation, and procedures”
- Part 2: “Procedure to determine the Specific Absorption Rate (SAR) for hand-held devices used in close proximity of the ear (frequency range of 30 MHz to 6 GHz)”
- TP-D01-032-E020-V2 E-Field probe calibration procedure
- D22-012-Tissue dielectric tissue calibration procedure
- D28-002-Dipole procedure for validation of SAR system using a dipole
- IEEE 1309 Draft Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas, from 9kHz to 40GHz

Conditions

Dipole 210-00710 was a recalibration.

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

Dipole Calibration uncertainty

The calibration uncertainty for the dipole is made up of various parameters presented below.

Mechanical	1%
Positioning Error	1.22%
Electrical	1.7%
Tissue	2.2%
Dipole Validation	2.2%
TOTAL	**8.32% (16.64% K=2)**

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Dipole Calibration Results

Mechanical Verification

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

Electrical Validation

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	1900MHz	1.084 U	-27.92 dB	52.247 Ω
Body	1900MHz	1.128 U	-24.40 dB	52.618 Ω

Tissue Validation

	Dielectric constant, ε_r	Conductivity, σ [S/m]
Head Tissue 1900MHz	40.20	1.38
Body Tissue 1900MHz	52.63	1.46

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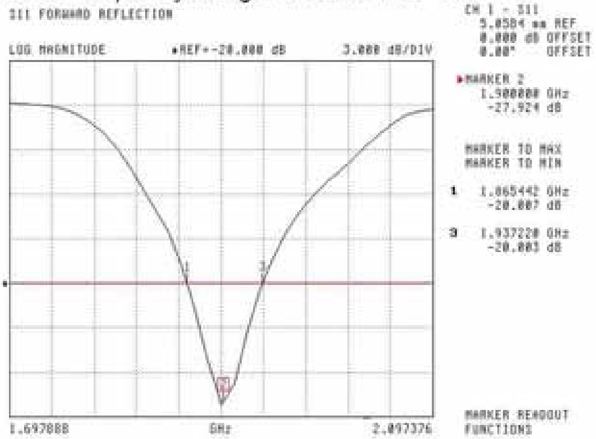
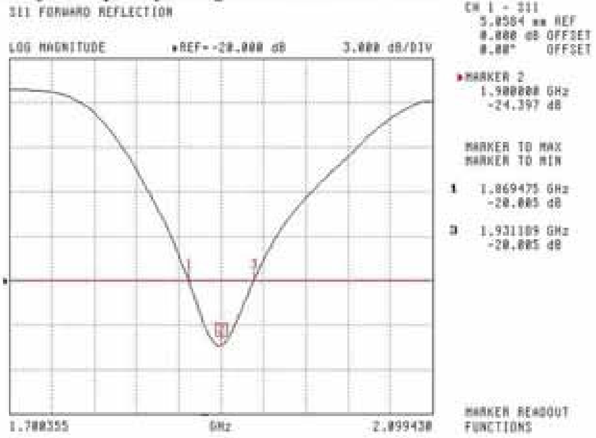
The Following Graphs are the results as displayed on the Vector Network Analyzer.

S11 Parameter Return Loss

Head: Frequency Range 1.865 to 1.937 GHz



Body: Frequency Range 1.869 to 1.931 MHz



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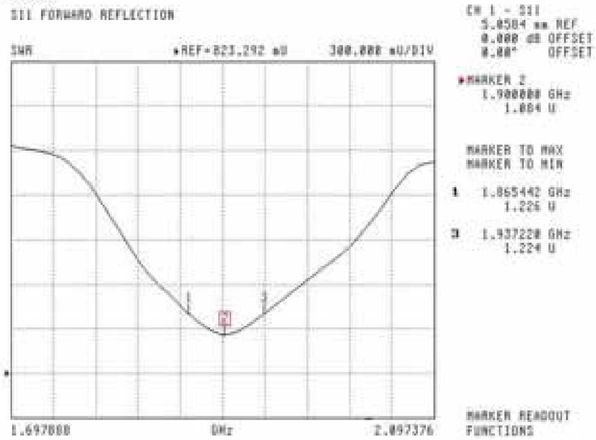
SWR

Head



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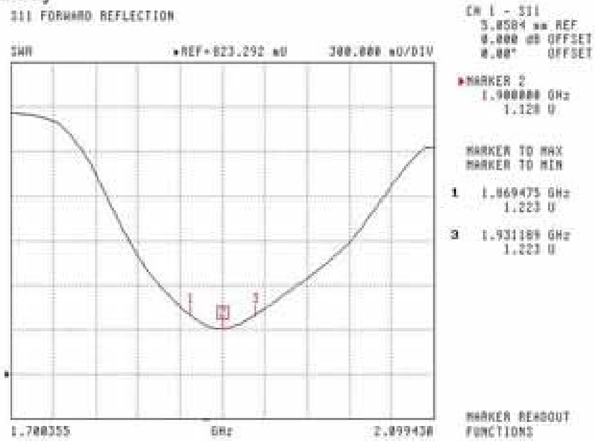

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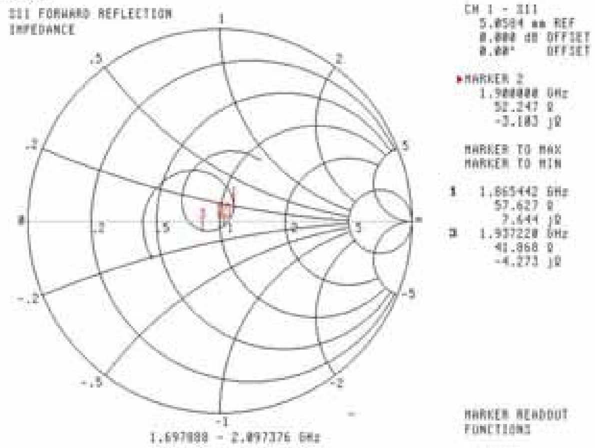
Smith Chart Dipole Impedance

Head



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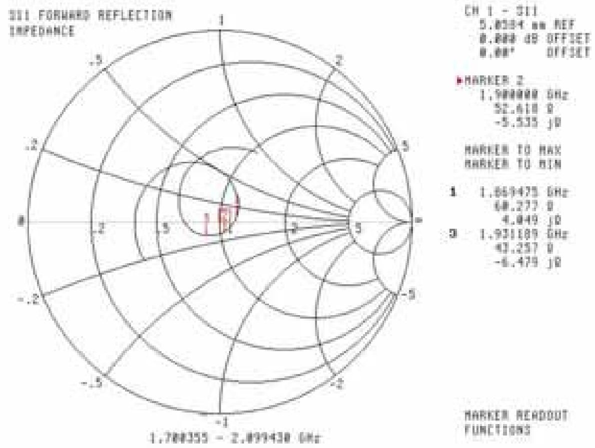

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Test Equipment

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 2014

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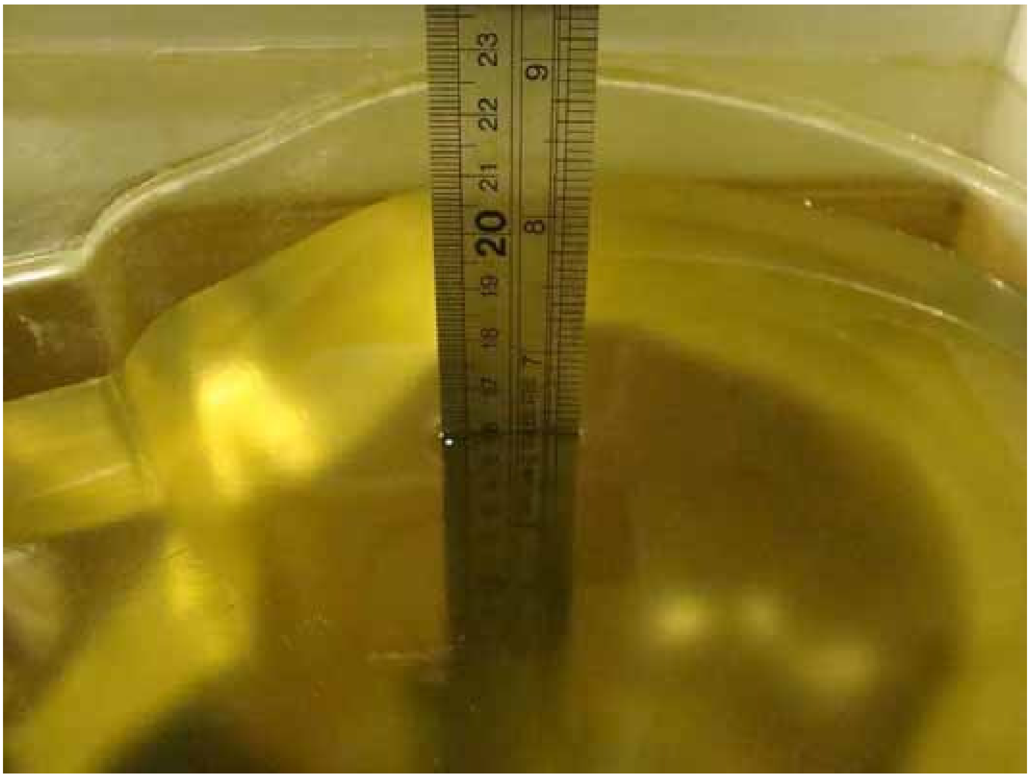
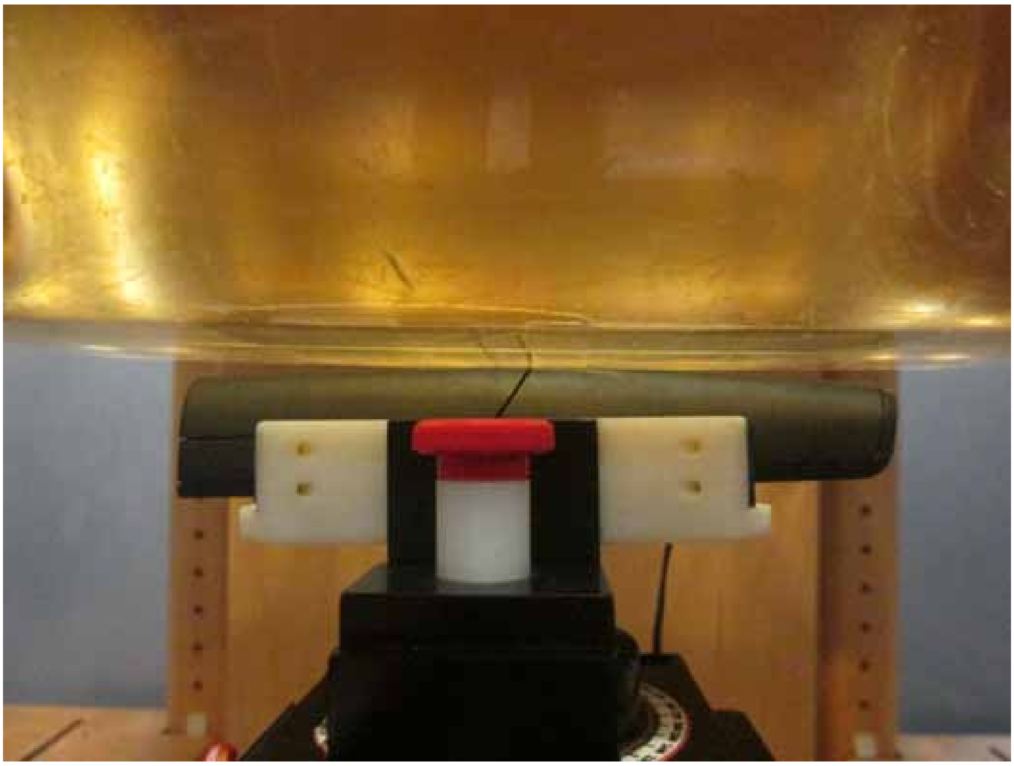
APPENDIX D EUT TEST POSITION PHOTOS

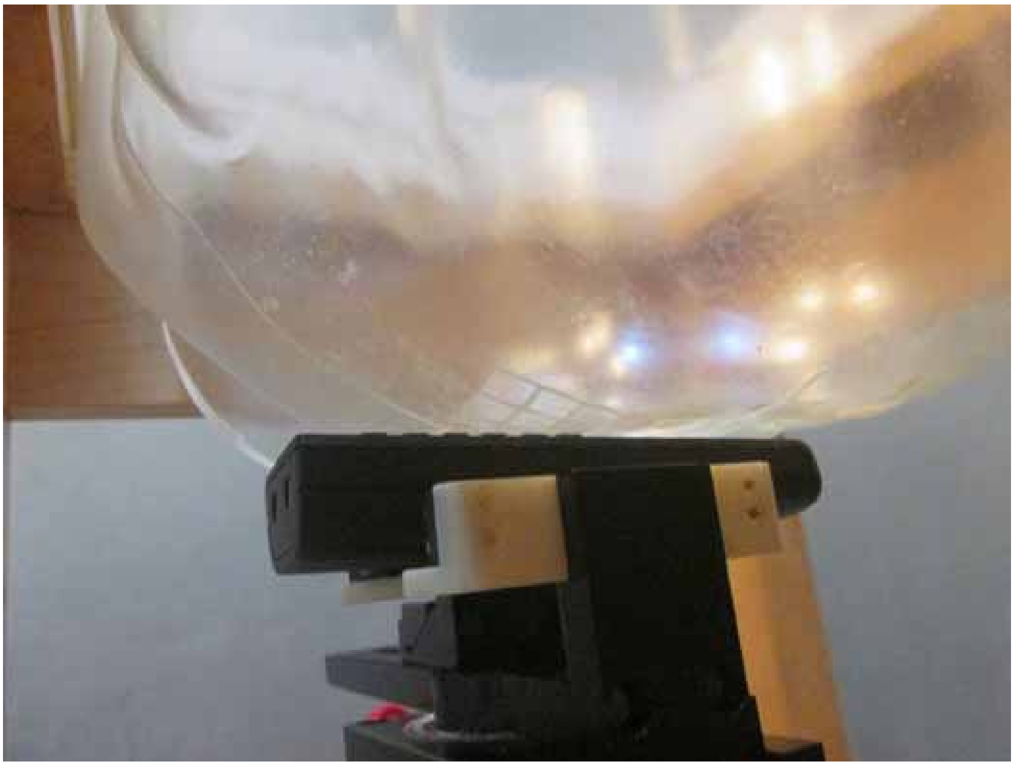
Liquid depth ≥ 15cm



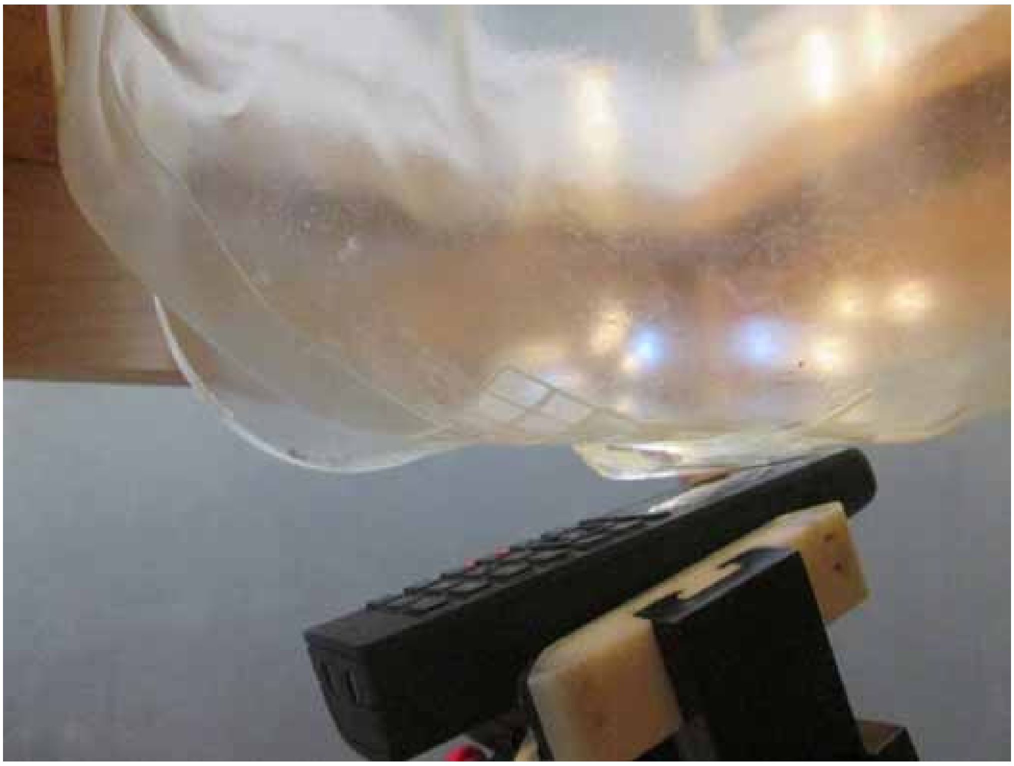
Body-Worn-Back with Headset



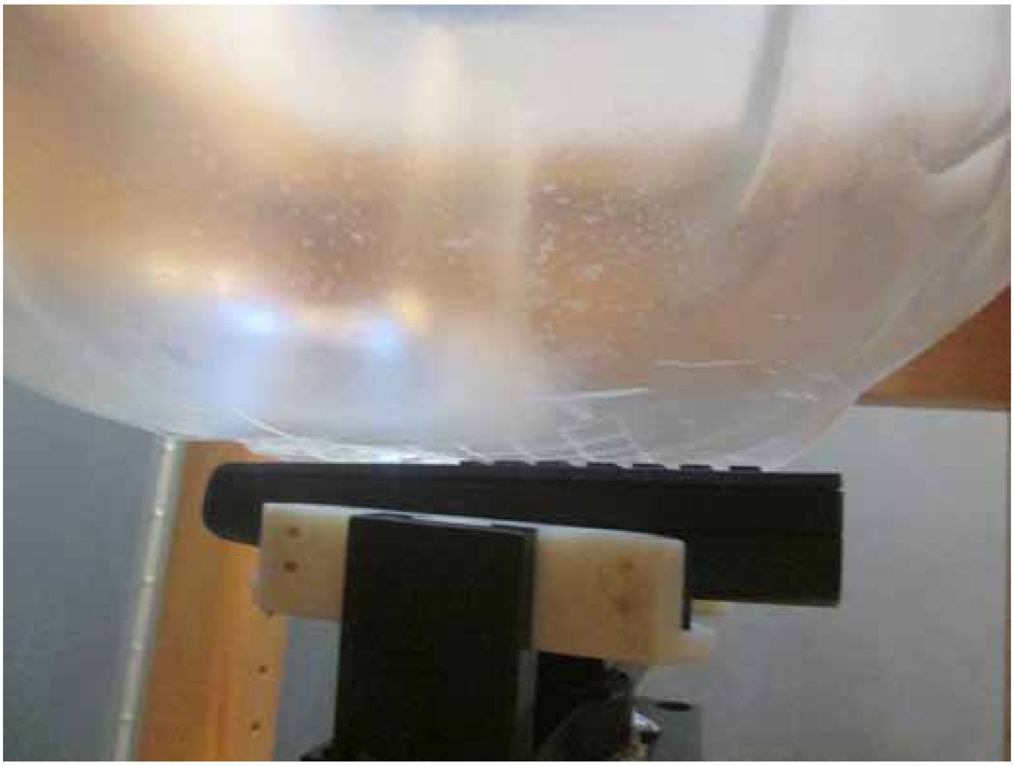
Left Head Touch Setup Photo



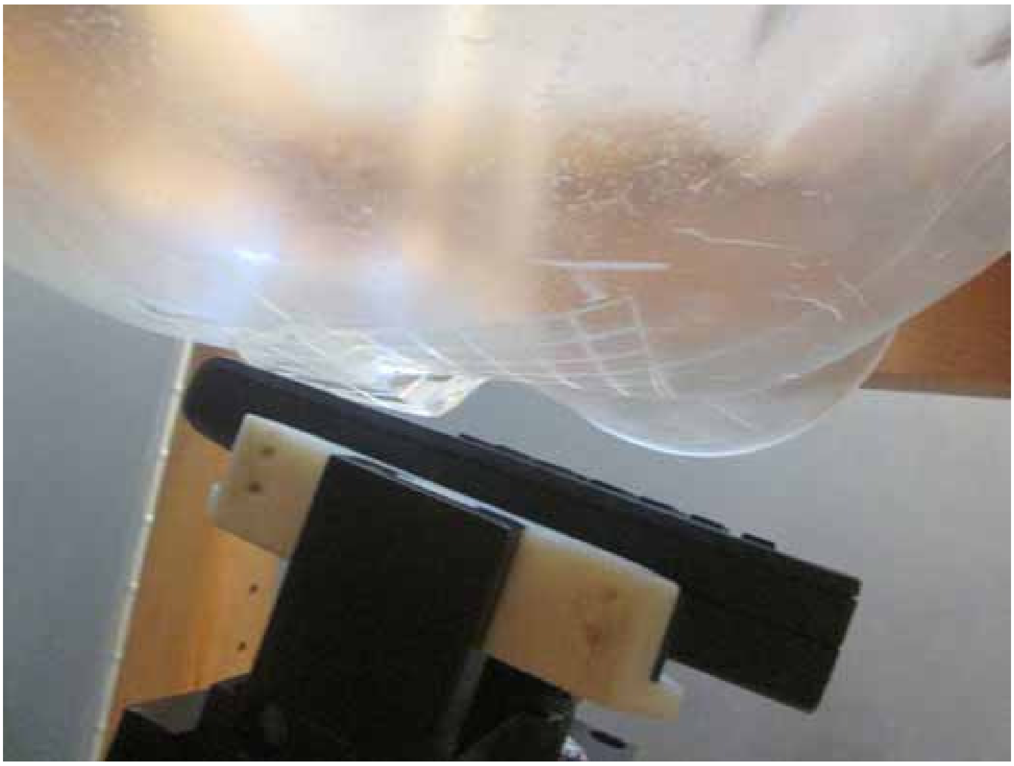
Left Head Tilt Setup Photo



Right Head Touch Setup Photo



Right Head Tilt Setup Photo



APPENDIX E EUT PHOTOS

EUT – Front View(DECT Handset)

EUT – Back View (DECT Handset)

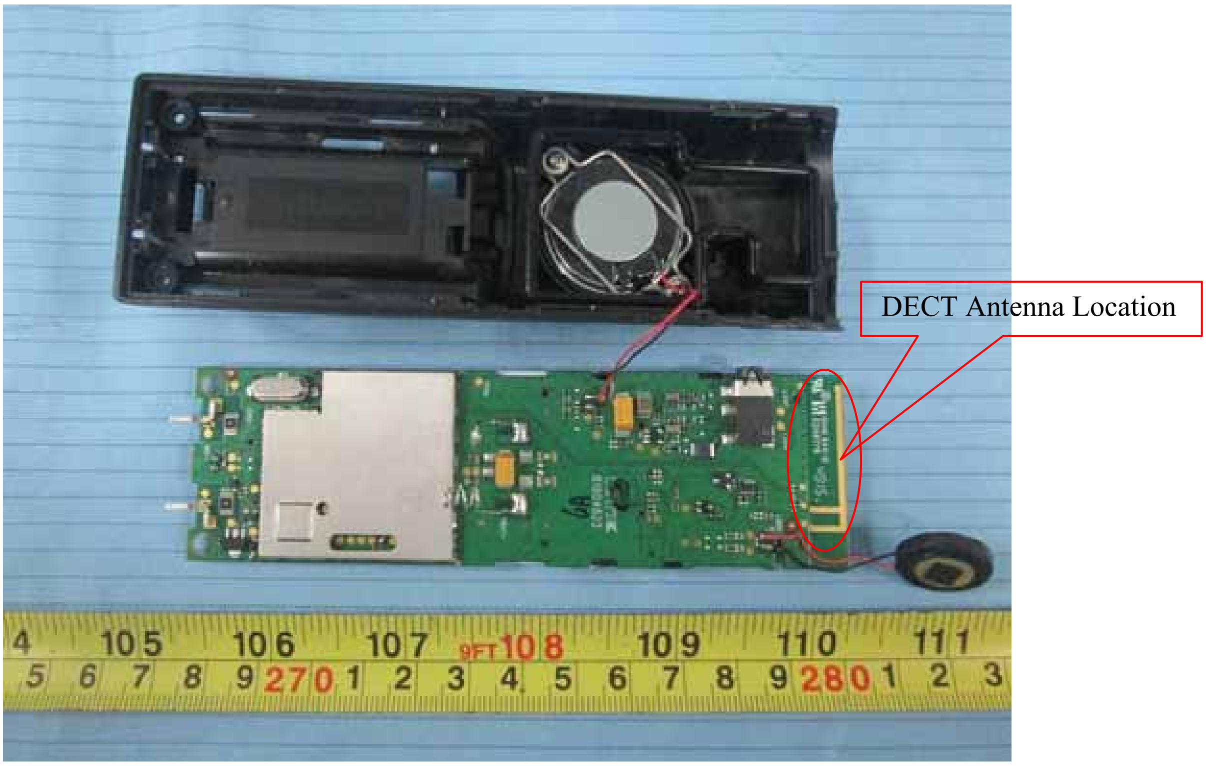
EUT – Left Side View (DECT Handset)

EUT – Right Side View (DECT Handset)

EUT – Top View (DECT Handset)

EUT – Bottom View (DECT Handset)

EUT – Uncover View



APPENDIX F INFORMATIVE REFERENCES

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[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, O_ce of Engineering & Technology, Washington, DC, 1997.

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assessments", IEEE Transactions on Microwave Theory and Techniques, vol. 44, pp. 105{113, Jan. 1996.

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[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.

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[12] W. H. Press, S. A. Teukolsky,W. T. Vetterling, and B. P. Flannery, Numerical Recepies 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 uncertainity 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.

PRODUCT SIMILARITY DECLARATION LETTER

RTX Hong Kong Ltd.
8/F Corporation Square,8 Lam Lok Street,Kowloon Bay,Hong Kong
Tel: +852 24873718
Fax: +852 24806121
Email: TED@rtx.hk

DECLARATION OF SIMILARITY

Mar.31, 2016

To:
FEDERAL COMMUNICATIONS COMMISSIONS
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Dear Sir or Madam:

We *RTX Hong Kong Ltd.* hereby declare that product: DECT Handset, FCC ID: T7HCT8101 model: 8212 DECT Handset is electrically identical with the same electromagnetic emissions and electromagnetic compatibility characteristics as model: RTX8101 DECT Handset tested by BACL, the results of which are featured in BACL project: RSZ160118010.

A description of the differences between the tested model and those that are declared similar are as follows:

	Model number	Trade Mark
1	8212 DECT Handset	Alcatel-Lucent
2	RTX8101 DECT Handset	RTX

Please contact me should there be need for any additional clarification or information.

Best Regards,

Signature:

Ted Chong
Engineering Manager

QA-FR-227-A

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