FCC 47 CFR §2.1093 and IEEE Std 1528-2013

in accordance with the requirements of FCC Report and Order: ET Docket 93-62

FCC TEST REPORT

For

802.11a/b/g/n/ac RTL8821AU Combo module

Trade Name: Realtek

Model: RTL8821AU

Issued to

Realtek Semiconductor Corp. No. 2 Innovation Road II, Hsinchu Science Park, Hsinchu

Issued by

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Revision History

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1 Certificate of Compliance (SAR Evaluation)

The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

Approved by: Tested by:

Hrv

Scott Hsu and the second second service of the second service services of the service services of the services Section Manager Section Manager SAR Engineer Compliance Certification Services Inc. Compliance Certification Services Inc.

Chiang

2 Description of Equipment Under Test

Remark:

1.The sample selected for test was prototype that representative to production product and was provided by manufacturer

2.1 Summary of Highest SAR Values

Results for highest reported SAR values for each frequency band and mode.

3 Requirements for Compliance Testing Defined

3.1 Requirements for Compliance Testing Defined by the FCC

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996 [1]. The 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 W/kg for an uncontrolled environment and 8.0 mW/g for an occupational/controlled environment as recommended by the FCC 47 CFR §2.1093 and IEEE Std 1528-2013.

4 Dosimetric Assessment System

These measurements were performed with the automated near-field scanning system DASY4/DASY5 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9 m) which positions the probes with a positional repeatability of better than \pm 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The SAR measurements were conducted with the dosimetric probe EX3DV4-SN: 3665 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure with accuracy of better than ±10%. The spherical isotropy was evaluated with the procedure and found to be better than ±0.25 dB. The phantom used was the SAM Twin Phantom as described in FCC supplement C, IEEE 1528 2013.

4.1 Measurement System Diagram

The DASY5 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (St¨aubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, ADconversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to the DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7 or Windows XP.
- DASY5 software version: 52.8.8.1258.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing validating the proper functioning of the system.

4.2 System Components

System Validation Kits for SAM Phantom (V4.0)

5 Evaluation Procedures

Data Evaluation

The DASY4/DASY5 post processing software (SEMCAD) automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

These parameters must be set correctly in the software. They can be found in the component documents or be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DCtransmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

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

\nwith
\n
$$
V_i = \text{Compensated signal of channel i} \qquad (i = x, y, z)
$$

\n
$$
U_i = \text{Input signal of channel i} \qquad (i = x, y, z)
$$

\n
$$
cf = \text{Crest factor of exciting field} \qquad (\text{DASY parameter})
$$

\n
$$
dcp_i = \text{Diode compression point} \qquad (\text{DASY parameter})
$$

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:
\n
$$
E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}
$$
\nH-field probes:
\n
$$
H_i = \sqrt{Vi} \cdot \frac{a_{i10} + a_{i11}f + a_{i12}f^2}{f}
$$
\nwith
\n
$$
V_i = \text{Compensated signal of } G
$$

with V_i = Compensated signal of channel i $(i = x, y, z)$ *Norm_i* = Sensor sensitivity of channel i $(i = x, y, z)$

V/(V/m)² for E0field Probes

ConvF = Sensitivity enhancement in solution

f

- *aij* = Sensor sensitivity factors for H-field probes
- *f* = Carrier frequency (GHz)
- *Ei* = Electric field strength of channel i in V/m
- *Hi* = Magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$
E_{\omega t} = \sqrt{E_x^2 + E_y^2 + E_z^2}
$$

The primary field data are used to calculate the derived field units.

$$
SAR = E_{\text{tot}}^2 \cdot \frac{\sigma}{\rho \cdot 1000}
$$

with *SAR* = local specific absorption rate in W/kg

Etot = total field strength in V/m

 σ = conductivity in [mho/m] or [Siemens/m]

 ρ = equivalent tissue density in g/cm³

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

The power flow density is calculated assuming the excitation field as a free space field.

$$
P_{pwe} = \frac{E_{tot}^2}{377}
$$
 or $P_{pwe} = H_{tot}^2 \cdot 37.7$

with $P_{\text{pwe}} =$ Equivalent power density of a plane wave in mW/cm²

Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m

6 SAR Measurement Procedures

6.1 Normal SAR Test Procedure

• **Power Reference Measurement**

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

• **Area Scan**

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a finer measurement around the hot spot. The sophisticated interpolation routines implemented in DASY4/DASY5 software can find the maximum locations even in relatively coarse grids. The scan area is defined by an editable grid. This grid is anchored at the grid reference point of the selected section in the phantom. When the area scan's property sheet is brought-up, the grid resolution has to less than 15 mm by 15 mm at frequency ≤2GHz; the grid resolution has to less than 12mm by 12 mm at frequency between 2GHz to 4GHz; grid resolution has to less than 10 mm by 10 mm at frequency between 4GHz to 6GHz.

According to KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04

• **Zoom Scan**

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default zoom scan measures points in accordance with the frequency can be divided into three parts. (1)The zoom scan volume was set to 5x5x7 points at frequency ≤ 2GHz. (2) The zoom scan volume was set to 7x7x7 points at frequency between 2GHz to 4GHz (3) The zoom scan volume was set to 7x7x12 points at frequency between 4GHz to 6GHz. The measures points within a cube whose base faces are centered around the maximum found in a preceding area scan job within the same procedure. If the preceding Area Scan job indicates more then one maximum, the number of Zoom Scans has to be enlarged accordingly.

• **Power Drift Measurement**

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have DASY4/DASY5 software stop the measurements if this limit is exceeded.

• **Z-Scan**

The Z Scan job measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. A user can anchor the grid to the current probe location. As with any other grids, the local Z-axis of the anchor location establishes the Z-axis of the grid.

7 Measurement Uncertainty

According to KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz section 2.8.2, SAR measurement uncertainty analysis is required in SAR reports only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

8 Device Under Test

8.1 Wireless Technologies

8.2 Maximum Tune-up Power

1. For Bluetooth max. power that we choose the highest power of the BT BDR/EDR and LE modes.

8.3 Simultaneous Transmission

1. WLAN 5GHz and Bluetooth technology can transmit at same time.

9 Summary of SAR Test Exclusion Configurations

9.1 Standalone SAR Test Exclusion Calculations

According to KDB 941225 D07 v01r02, all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge SAR testing is required.

9.1.1 SAR Required Test Configuration

Note(s): 1. Yes = SAR is required.

2. No = SAR is not required.

10 Exposure Limit

NOTE: **Whole-Body SAR** is averaged over the entire body, **partial-body SAR** is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. **SAR for hands, wrists, feet and ankles** is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

Population/Uncontrolled Environments:

are defined as locations where there is the exposure of individuals 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).

NOTE GENERAL POPULATION/UNCONTROLLED EXPOSURE PARTIAL BODY LIMIT 1.6 W/kg

11 Tissue Dielectric Properties

11.1 Test Liquid Confirmation

Simulating Liquids Parameter Check

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectric parameters are within the tolerances of the specified target values

The relative permittivity and conductivity of the tissue material should be within \pm 5% of the values given in the table below 5% may not be easily achieved at certain frequencies.

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in IEEE 1528 2013 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 IEEE 1528 2013 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations and extrapolated according to the head parameters specified in IEEE 1528 2013

11.2 Typical Composition of Ingredients for Liquid Tissue Phantoms

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

alt: 99⁺% Pure Sodium Chloride Sugar: 98⁺% Pure Sucrose

Water: De-ionized, 16 M Ω^* resistivity HEC: Hydroxy thyl Cellulose

DGBE: 99⁺% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra-pure): Polyethylene glycol mono [4-(1, 1, 3, 3-tetramethylbutyl)phenyl]ether

Simulating Liquids for 5 GHz, Manufactured by SPEAG

11.3 Simulating Liquids Parameter Check Results

12 System Performance Check

The system performance check is performed prior to any usage of the system in order to guarantee reproducible results. The system performance check verifies that the system operates within its specifications. The system performance check results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the SAM twin phantom filled with Body simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm
- The DASY5 system with an E-field probe EX3DV4 SN: 3665 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 15 mm (below 1 GHz) and 10 mm (above 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 10mm was aligned with the dipole.
- Special 7x7x7 fine cube was chosen for cube integration (dx=dy= 5 mm, dz= 5 mm).
- Distance between probe sensors and phantom surface was set to 3.0 mm.
- The dipole input power (forward power) was 100 mW±3%.
- The results are normalized to 1 W input power.

Reference SAR Values for System Performance Check

The reference SAR values can be obtained from the calibration certificate of system validation dipoles

12.1 System Performance Check Results

13 RF Output Power Measurement

According to KDB248227 D01 802.11 Wi-Fi SAR v02r02 section 4, the default power measurement procedures are:

1) Power must be measured at each transmit antenna port according to the DSSS and OFDM transmission configurations in each standalone and aggregated frequency band.

2) Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units.

a) When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.

b) When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.

3) For each transmission mode configuration, power must be measured for the highest and lowest channels; and at the mid-band channel(s) when there are at least 3 channels. For configurations with multiple midband channels, due to an even number of channels, both channels should be measured.

13.1 Wi-Fi (2.4GHz Band)

Note(s):

1. Output Power and SAR is not required for 802.11 g /n HT40 channels when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

13.2 Wi-Fi (5GHz Band)

Note(s):

1. When the specified maximum output power is the same for both UNII band I and UNII band 2A, begin SAR measurement in UNII band 2A; and if the highest reported SAR for UNII band 2A is

1.1. ≤ 1.2 W/kg, SAR is not required for UNII band I.

1.2. > 1.2 W/kg, both bands should be tested independently for SAR.

2. Output Power and SAR measurement is not required for 802.11n/ HT20/n HT40 channels when the specified maximum tune-up powers are less or same with 802.11ac .

13.3 Bluetooth

According to KDB 447498 v06 in section 4.3.1, the Bluetooth max. output power less 10dBm(10mW). In this case for the Bluetooth SAR testing is not required.

14 SAR Measurements Results

According to KDB248227D01 802.11 Wi-Fi SAR v02r02, the SAR test reduction procedures are:

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

- ➢≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- \ge > 0.4 W/kg, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is ≤ 0.8 W/kg or all required test positions are tested.
	- For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
	- When it is unclear, all equivalent conditions must be tested.
- \triangleright For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is > 0.8 W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required test channels are considered.
	- The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- ➢When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is \leq 1.2 W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- ➢When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is ≤ 1.2 W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

To determine the initial test position, Area Scans were performed to determine the position with the Maximum Value of SAR (measured). The position that produced the highest Maximum Value of SAR is considered the worst case position; thus used as the initial test position

Wi-Fi (2.4GHz Band):

1 Highest reported SAR is > 0.4 W/kg. Due to the highest reported SAR for this test position, other test positions in this exposure condition were evaluated until a SAR ≤ 0.8 W/kg was reported.

2 According to KDB 941225 D07 UMPC mini-tablet devices must be tested for 1-g SAR on all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge, at 5 mm separation from a flat phantom.

Wi-Fi (5 GHz Band):

Note(s):

1. Highest reported SAR is > 0.4 W/kg. Due to the highest reported SAR for this test position, other test positions in this exposure condition were evaluated until a SAR ≤ 0.8 W/kg was reported.

2. According to KDB 941225 D07 UMPC mini-tablet devices must be tested for 1-g SAR on all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge, at 5 mm separation from a flat phantom.

15 Simultaneous Transmission SAR Analysis

KDB 447498 D01 General RF Exposure Guidance v06, introduces a new formula for calculating the SAR to Peak Location Ratio (SPLSR) between pairs of simultaneously transmitting antennas:

SPLSR = (SAR¹ + SAR2) 1.5 /Rⁱ

Where:

SAR¹ is the highest Reported or estimated SAR for the first of a pair of simultaneous transmitting antennas, in a specific test operating mode and exposure condition

SAR² is the highest Reported or estimated SAR for the second of a pair of simultaneous transmitting antennas, in the same test operating mode and exposure condition as the first

Rⁱ is the separation distance between the pair of simultaneous transmitting antennas. When the SAR is measured, for both antennas in the pair, it is determined by the actual x, y and z coordinates in the 1-g SAR for each SAR peak location, based on the extrapolated and interpolated result in the zoom scan measurement, using the formula of $[(x_1-x_2)^2+(y_1-y_2)^2+(z_1-z_2)^2]$

A new threshold of 0.04 is also introduced in the KDB. Thus, in order for a pair of simultaneous transmitting antennas with the sum of 1-g SAR > 1.6 W/kg to qualify for exemption from Simultaneous Transmission SAR measurements, it has to satisfy the condition of:

 $(SAR₁ + SAR₂)^{1.5} / R_i \le 0.04$

15.1 Estimated SAR for Simultaneous Transmission SAR Analysis

Considerations for SAR estimation

- 1. When standalone SAR test exclusion applies, standalone SAR must also be estimated to determine simultaneous transmission SAR test exclusion.
- 2. Dedicated Host Approach criteria for SAR test exclusion is likewise applied to SAR estimation, with certain distinctions between test exclusion and SAR estimation:
	- When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied for SAR estimation; this is the same between test exclusion and SAR estimation calculations.
	- When the separation distance from the antenna to an adjacent edge is > 5 mm but ≤ 50 mm, the actual antenna-to-edge separation distance is applied for SAR estimation.
	- When the minimum test separation distance is > 50 mm, the estimated SAR value is 0.4 W/kg

15.1.1 Estimated SAR for Bluetooth

According to section 9, the Bluetooth must be estimated according to following to determine simultaneous transmission SAR test exclusion:

• *(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)]·[√f(GHz)/x]* W/kg for test separation distances \leq 50 mm; where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.

• 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

15.2 Simultaneous Transmission Analysis

15.2.1 Sum of the SAR for Wi-Fi + BT

Per KDB 447498 D01 section 4.3.2, the simultaneous transmitting antennas in each operating mode and exposure condition combination must be considered one pair at a time to determine the SAR to peak location separation ratio to qualify for test exclusion.

Wi-Fi 5GHz + BT

As the Sum of the SAR is less than 1.6W/Kg, so SPLSR is not required.

16 Equipment List & Calibration Status

17 Facilities

All measurement facilities used to collect the measurement data are located at

No. 81-1, Lane 210, Bade Rd. 2, Luchu Hsiang, Taoyuan Hsien, Taiwan, R.O.C.

 \boxtimes No.11, Wugong 6th Rd., Wugu Dist., New Taipei City 24891, Taiwan. (R.O.C.)

No. 199, Chunghsen Road, Hsintien City, Taipei Hsien, Taiwan, R.O.C.

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19 Attachments

END OF REPORT