

**TEST REPORT  
FROM  
RFI GLOBAL SERVICES LTD**

Test of: Panasonic Mobile Comms Dev of Europe Ltd.  
VS70A

To: OET Bulletin 65 Supplement C: (2001-01)

**Test Report Serial No:**  
RFI/SARE1/RP72327JD02A

**This Test Report Is Issued Under The Authority  
Of Andrew Brown, Operations Manager:**



**Tested By: Richelieu Quoi**



**Checked By: Tony Henriques**



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**Test Dates: 01 November 2006**

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This report may be copied in full. The results in this report apply only to the sample(s) tested.

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Registered in England and Wales. Company number:2117901

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## 1. Customer Information

<b>Company Name:</b>	Panasonic Mobile Comms Dev of Europe Ltd
<b>Address:</b>	2 Gables Way Colthrop Thatcham Berkshire RG19 4ZB
<b>Contact Name:</b>	Mr M Hargreaves

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## **2. Equipment Under Test (EUT)**

The following information (with the exception of the date of receipt) has been supplied by the customer:

### **2.1. Description of EUT**

The equipment under test is a Tri-band mobile station operating at PCS1900 and GPRS1900.

### **2.2. Identification of Equipment Under Test (EUT)**

Brand Name:	Panasonic
Model Name or Number:	VS70A
Unique Type Identification:	Sample C3
IMEI Number:	004401220170043
Hardware Version Number:	Rev D
Software Version Number:	706PVB01
FCC ID Number:	UCE206001A
Country of Manufacture:	Japan
Date of Receipt:	01 November 2006

### **2.3. Modifications Incorporated in the EUT**

During the course of testing the EUT was not modified.

### **2.4. Accessories**

The following accessories were supplied with the EUT during testing:

Description:	Stereo Personal Handsfree
Brand Name:	None stated
Model Name or Number:	Sample C25
Serial Number:	None Stated
Cable Length and Type:	1.77m headphone 2 core
Connected to Port:	Headphone Jack Unique to Manufacturer

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### 2.5. Support Equipment

The following support equipment was used to exercise the EUT during testing:

<b>Description:</b>	Communication Test Set
<b>Brand Name:</b>	Will'Tek
<b>Model Name or Number:</b>	4202S
<b>Serial Number:</b>	0513018
<b>Cable Length and Type:</b>	1.5m Utiflex
<b>Connected to Port:</b>	RF In/Out Port (Air Link via Antenna)

<b>Description:</b>	Radio Communication Analyser
<b>Brand Name:</b>	Anritsu
<b>Model Name or Number:</b>	MT8820A
<b>Serial Number:</b>	6K00000647
<b>Cable Length and Type:</b>	1.5m Utiflex
<b>Connected to Port:</b>	RF In/Out Port (Air Link via Antenna)

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## 2.6. Additional Information Related to Testing

<b>Equipment Category</b>	PCS 1900 & GPRS 1900		
<b>Type of Unit</b>	Portable (Standalone battery powered device)		
<b>Intended Operating Environment:</b>	Within GSM Coverage		
<b>Transmitter Maximum Output Power Characteristics:</b>	30 dBm		
<b>Transmitter Frequency Range:</b>	1850 MHz to 1910 MHz		
<b>Transmitter Frequency Allocation of EUT When Under Test:</b>	<b>Channel Number</b>	<b>Channel Description</b>	<b>Frequency (MHz)</b>
	512	Low	1850.2
	660	Middle	1879.8
	810	High	1909.8
<b>Modulation(s):</b>	217 Hz		
<b>Modulation Scheme (Crest Factor):</b>	GSM: Crest Factor 8.3, GPRS: Crest Factor: 4		
<b>Antenna Length and Type:</b>	Length: Unknown, Type: Internal		
<b>Number of Antenna Positions:</b>	1 Fixed		
<b>Power Supply Requirement:</b>	Internal Battery Supply 3.98 V DC		

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### **3. Test Specification, Methods and Procedures**

#### **3.1. Test Specification**

<b>Reference:</b>	OET Bulletin 65 Supplement C: (2001-01)
<b>Title:</b>	Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields.
<b>Purpose of Test:</b>	To determine whether the equipment met the basic restrictions as defined in OET Bulletin 65 Supplement C: (2001-01) using the SAR averaging method as described in the test specification above.

#### **3.2. Methods and Procedures Reference Documentation**

The methods and procedures used were as detailed in:

EN 62209-1: 2006

Title: Basic standard for the measurement of specific absorption rate related to human exposure to electromagnetic fields from mobile phones (300 MHz - 3 GHz).

ANSI/IEEE C95.1: 1999

IEEE standard for safety levels with respect to human exposure to radio frequency electromagnetic fields, 3 kHz to 300 GHz.

Federal Communications Commission, "Evaluating compliance with FCC Guidelines for human exposure to radio frequency electromagnetic fields", OET Bulletin 65 Supplement C, FCC, Washington, D.C, 20554, 2001.

Thomas Schmid, Oliver Egger and Neils Kuster, "Automated E-field scanning system for dosimetric assessments", IEEE Transaction on microwave theory and techniques, Vol. 44, pp. 105-113, January 1996.

Neils Kuster, Ralph Kastle and Thomas Schmid, "Dosimetric evaluation of mobile communications equipment with know precision", IEICE Transactions of communications, Vol. E80-B, No.5, pp. 645-652, May 1997.

#### **3.3. Definition of Measurement Equipment**

The measurement equipment used complied with the requirements of the standards referenced in the methods & procedures section above. Appendix 1 contains a list of the test equipment used.

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#### **4. Deviations from the Test Specification**

There were no deviations from the test specification.

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## **5. Operation and Configuration of the EUT during Testing**

### **5.1. Operating Modes**

The EUT was tested in the following operating mode(s) unless otherwise stated:

PCS1900 Call Allocated Mode

GPRS 1900 Data Allocated.

The reason for choosing this configuration was that it has been defined by the customer as being typical of normal use and likely to be worst case.

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## **5.2. Configuration and Peripherals**

The EUT was tested in the following configuration(s) unless otherwise stated:

Standalone mobile station without personal hands-free in head configuration.

Standalone mobile station with personal hands-free in body-worn configuration.

### **Head Configuration**

- a) The handset was placed in a normal operating position with the centre of the ear-piece aligned with the ear canal on the phantom.
- b) With the ear-piece touching the phantom the centre line of the handset was aligned with an imaginary plane (X and Y axis) consisting of three lines connecting both ears and the mouth.
- c) For the cheek position the handset was gradually moved towards the cheek until any point of the mouth-piece or keypad touched the cheek.
- d) For the tilted position the EUT was positioned as for the cheek position, and then the horizontal angle was increased by fifteen degrees (the phone keypad was moved away from the cheek by fifteen degrees).
- e) SAR measurements were evaluated at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimise the drift.
- f) The device was keyed to operate continuously in the transmit mode for the duration of the test.
- g) The location of the maximum spatial SAR distribution (hot spot) was determined relative to the handset and its antenna.
- h) The EUT was tested with a fully charged battery.

### **Body Configuration**

- a) The EUT was placed in a normal operating position where the centre of EUT was aligned with the centre reference point on the flat section of the 'SAM' phantom.
  - b) With the EUT touching the phantom at an imaginary centre line. The EUT was aligned with a marked plane (X and Y axis) consisting of two lines.
  - c) For the touch-safe position the handset was gradually moved towards the flat section of the 'SAM' phantom until any point of the EUT touched the phantom.
  - d) For position(s) greater than 0mm separation the EUT was positioned as per the touch-safe position, and then the vertical height was decreased/adjusted as required.
  - e) SAR measurements were evaluated at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimise the drift.
  - f) The device was keyed to operate continuously in the transmit mode for the duration of the test.
  - g) The location of the maximum spatial SAR distribution (hot spot) was determined relative to the handset and its antenna.
  - h) The EUT was tested with a fully charged battery.
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## **6. Summary of Test Results**

<b>Test Name</b>	<b>Specification Reference</b>	<b>Compliance Status</b>
Specific Absorption Rate (SAR) PCS1900 – Head Configuration	FCC OET Bulletin 65 Supplement C: (2001-01)	Complied
Specific Absorption Rate (SAR) PCS1900 – Body Configuration	FCC OET Bulletin 65 Supplement C: (2001-01)	Complied
Specific Absorption Rate (SAR) GPRS1900 – Body Configuration	FCC OET Bulletin 65 Supplement C: (2001-01)	Complied

### **6.1. Location of Tests**

All the measurements described in this report were performed at the premises of RFI Global Services Ltd, Ewhurst Park, Ramsdell, Basingstoke, Hampshire, RG26 5RQ.

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## **7. Measurements, Examinations and Derived Results**

### **7.1. General Comments**

This section contains test results only.

Measurement uncertainties are evaluated in accordance with current best practice. Our reported expanded uncertainties are based on standard uncertainties, which are multiplied by an appropriate coverage factor to provide a statistical confidence level of approximately 95%. Please refer to section 8 for details of measurement uncertainties.

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## 7.2. Test Results

### 7.2.1. Specific Absorption Rate – PCS1900 – Head Configuration

#### Test Summary:

Tissue Volume:	1g
Maximum Level (W/kg):	0.768

#### Environmental Conditions:

Temperature Variation in Lab (°C):	24.0 to 23.0
Temperature Variation in Liquid (°C):	25.0 to 24.0

#### Results:

EUT Position	Phantom Configuration	Channel Number	Level (W/kg)	Limit (W/kg)	Margin (W/kg)	Note(s)	Result
Touch	Left	660	0.473	1.600	1.127	-	Complied
Tilt	Left	660	0.142	1.600	1.458	-	Complied
Touch	Right	660	0.625	1.600	0.975	-	Complied
Tilt	Right	660	0.165	1.600	1.435	-	Complied
Touch	Right	512	0.768	1.600	0.832	-	Complied
Touch	Right	810	0.696	1.600	0.904	-	Complied

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### 7.2.2. Specific Absorption Rate – PCS1900 - Body Configuration

#### Test Summary:

Tissue Volume:	1g
Maximum Level (W/kg):	0.114

#### Environmental Conditions:

Temperature Variation in Lab (°C):	24.0 to 23.0
Temperature Variation in Liquid (°C):	23.0 to 23.0

#### Results:

EUT Position	Phantom Configuration	Channel Number	Level (W/kg)	Limit (W/kg)	Margin (W/kg)	Note(s)	Result
Rear of EUT Open Facing Phantom With PHF	Flat (SAM)	660	0.114	1.600	1.486	-	Complied

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### 7.2.3. Specific Absorption Rate GPRS1900 - Body Configuration

#### Test Summary:

Tissue Volume:	1g
Maximum Level (W/kg):	0.324

#### Environmental Conditions:

Temperature Variation in Lab (°C):	24.0 to 23.0
Temperature Variation in Liquid (°C):	23.0 to 23.0

#### Results:

EUT Position	Phantom Configuration	Channel Number	Level (W/kg)	Limit (W/kg)	Margin (W/kg)	Note(s)	Result
Rear of EUT Open Facing Phantom With PHF	Flat (SAM)	660	0.152	1.600	1.448	-	Complied
Front of EUT Open Facing Phantom With PHF	Flat (SAM)	660	0.218	1.600	1.382	-	Complied
Rear of EUT Close Facing Phantom With PHF	Flat (SAM)	660	0.291	1.600	1.309	-	Complied
Front of EUT Close Facing Phantom With PHF	Flat (SAM)	660	0.111	1.600	1.489	-	Complied
Rear of EUT Close Facing Phantom With PHF	Flat (SAM)	512	0.324	1.600	1.276	-	Complied
Rear of EUT Close Facing Phantom With PHF	Flat (SAM)	810	0.228	1.600	1.372	-	Complied



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#### 7.2.4. EIRP Measurement

Channel	Frequency MHz	TX Power before Test (dBm)
Top	1850.2	24.0
Middle	1879.8	26.4
Bottom	1909.8	26.7

#### Note(s):

- EIRP measurements are performed before testing.*
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## **8. Measurement Uncertainty**

No measurement or test can ever be perfect and the imperfections give rise to error of measurement in the results. Consequently, the result of a measurement is only an approximation to the value of the measurand (the specific quantity subject to measurement) and is only complete when accompanied by a statement of the uncertainty of the approximation.

The expression of uncertainty of a measurement result allows realistic comparison of results with reference values and limits given in specifications and standards.

The uncertainty of the result may need to be taken into account when interpreting the measurement results.

The reported expanded uncertainties below are based on a standard uncertainty multiplied by an appropriate coverage factor, such that a confidence level of approximately 95% is maintained. For the purposes of this document "approximately" is interpreted as meaning "effectively" or "for most practical purposes".

<b>Test Name</b>	<b>Confidence Level</b>	<b>Calculated Uncertainty</b>
Specific Absorption Rate - PCS1900 1g Head	95%	±18.44
Specific Absorption Rate - PCS1900 1g Body	95%	±18.30
Specific Absorption Rate - GPRS1900 1g Body	95%	±18.30

The methods used to calculate the above uncertainties are in line with those recommended within the various measurement specifications. Where measurement specifications do not include guidelines for the evaluation of measurement uncertainty, the published guidance of the appropriate accreditation body is followed.

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### Measurement Uncertainty (Continued)

#### PCS1900 1g Head

**Specific Absorption Rate Uncertainty at 1900 MHz Head 1g, PCS Modulation Scheme  
calculated in accordance with IEC 62209-1 & IEEE 1528**

Type	Source of uncertainty	+ Value	- Value	Probability Distribution	Divisor	C <sub>i</sub> (1g)	Standard Uncertainty		U <sub>i</sub> or U <sub>eff</sub>	Note
							+ u (%)	- u (%)		
B	Probe calibration	11.000	11.000	normal (k=2)	2.0000	1.0000	5.500	5.500	∞	
B	Axial Isotropy	0.500	0.500	normal (k=2)	2.0000	1.0000	0.250	0.250	∞	
B	Hemispherical Isotropy	2.600	2.600	normal (k=2)	2.0000	1.0000	1.300	1.300	∞	
B	Spatial Resolution	0.500	0.500	Rectangular	1.7321	1.0000	0.289	0.289	∞	
B	Boundary Effect	0.769	0.769	Rectangular	1.7321	1.0000	0.444	0.444	∞	
B	Linearity	0.600	0.600	Rectangular	1.7321	1.0000	0.346	0.346	∞	
B	Detection Limits	0.200	0.200	Rectangular	1.7321	1.0000	0.115	0.115	∞	
B	Readout Electronics	0.560	0.560	normal (k=2)	2.0000	1.0000	0.280	0.280	∞	
B	Response Time	0.000	0.000	Rectangular	1.7321	1.0000	0.000	0.000	∞	
B	Integration Time	1.730	1.730	Rectangular	1.7321	1.0000	0.999	0.999	∞	
B	RF Ambient conditions	3.000	3.000	Rectangular	1.7321	1.0000	1.732	1.732	∞	
B	Probe Positioner Mechanical Restrictions	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Probe Positioning with regard to Phantom Shell	2.850	2.850	Rectangular	1.7321	1.0000	1.645	1.645	∞	
B	Extrapolation and integration/ Maximum SAR evaluation	5.080	5.080	Rectangular	1.7321	1.0000	2.933	2.933	∞	
A	Test Sample Positioning	0.584	0.584	normal (k=1)	1.0000	1.0000	0.584	0.584	10	
A	Device Holder uncertainty	0.154	0.154	normal (k=1)	1.0000	1.0000	0.154	0.154	10	
B	Phantom Uncertainty	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Drift of output power	5.000	5.000	Rectangular	1.7321	1.0000	2.887	2.887	∞	
B	Liquid Conductivity (target value)	5.000	5.000	Rectangular	1.7321	0.6400	1.848	1.848	∞	
A	Liquid Conductivity (measured value)	4.370	4.370	normal (k=1)	1.0000	0.6400	2.797	2.797	5	
B	Liquid Permittivity (target value)	5.000	5.000	Rectangular	1.7321	0.6000	1.732	1.732	∞	
A	Liquid Permittivity (measured value)	4.450	4.450	normal (k=1)	1.0000	0.6000	2.670	2.670	5	
	Combined standard uncertainty			t-distribution			9.41	9.41	>300	
	Expanded uncertainty			k = 1.96			18.44	18.44	>300	

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### Measurement Uncertainty (Continued)

#### PCS1900 1g Body

#### Specific Absorption Rate Uncertainty at 1900 MHz Body 1g, PCS Modulation Scheme calculated in accordance with IEC 62209-1 & IEEE 1528

Type	Source of uncertainty	+ Value	- Value	Probability Distribution	Divisor	C <sub>i</sub> (1g)	Standard Uncertainty		v <sub>i</sub> or v <sub>eff</sub>	Note
							+ u (%)	- u (%)		
B	Probe calibration	11.000	11.000	normal (k=2)	2.0000	1.0000	5.500	5.500	∞	
B	Axial Isotropy	0.500	0.500	normal (k=2)	2.0000	1.0000	0.250	0.250	∞	
B	Hemispherical Isotropy	2.600	2.600	normal (k=2)	2.0000	1.0000	1.300	1.300	∞	
B	Spatial Resolution	0.500	0.500	Rectangular	1.7321	1.0000	0.289	0.289	∞	
B	Boundary Effect	0.769	0.769	Rectangular	1.7321	1.0000	0.444	0.444	∞	
B	Linearity	0.600	0.600	Rectangular	1.7321	1.0000	0.346	0.346	∞	
B	Detection Limits	0.200	0.200	Rectangular	1.7321	1.0000	0.115	0.115	∞	
B	Readout Electronics	0.560	0.560	normal (k=2)	2.0000	1.0000	0.280	0.280	∞	
B	Response Time	0.000	0.000	Rectangular	1.7321	1.0000	0.000	0.000	∞	
B	Integration Time	1.730	1.730	Rectangular	1.7321	1.0000	0.999	0.999	∞	
B	RF Ambient conditions	3.000	3.000	Rectangular	1.7321	1.0000	1.732	1.732	∞	
B	Probe Positioner Mechanical Restrictions	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Probe Positioning with regard to Phantom Shell	2.850	2.850	Rectangular	1.7321	1.0000	1.645	1.645	∞	
B	Extrapolation and integration/ Maximum SAR evaluation	5.080	5.080	Rectangular	1.7321	1.0000	2.933	2.933	∞	
A	Test Sample Positioning	0.584	0.584	normal (k=1)	1.0000	1.0000	0.584	0.584	10	
A	Device Holder uncertainty	0.154	0.154	normal (k=1)	1.0000	1.0000	0.154	0.154	10	
B	Phantom Uncertainty	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Drift of output power	5.000	5.000	Rectangular	1.7321	1.0000	2.887	2.887	∞	
B	Liquid Conductivity (target value)	5.000	5.000	Rectangular	1.7321	0.6400	1.848	1.848	∞	
A	Liquid Conductivity (measured value)	4.170	4.170	normal (k=1)	1.0000	0.6400	2.669	2.669	5	
B	Liquid Permittivity (target value)	5.000	5.000	Rectangular	1.7321	0.6000	1.732	1.732	∞	
A	Liquid Permittivity (measured value)	4.230	4.230	normal (k=1)	1.0000	0.6000	2.538	2.538	5	
	Combined standard uncertainty			t-distribution			9.34	9.34	>400	
	Expanded uncertainty			k = 1.96			18.30	18.30	>400	

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### Measurement Uncertainty (Continued)

#### GPRS1900 1g Body

Specific Absorption Rate Uncertainty at 1900 MHz Body 1g, GPRS Modulation Scheme  
calculated in accordance with IEC 62209-1 & IEEE 1528

Type	Source of uncertainty	+ Value	- Value	Probability Distribution	Divisor	C <sub>i</sub> (1g)	Standard Uncertainty		U <sub>i</sub> OR U <sub>eff</sub>	Note
							+ u (%)	- u (%)		
B	Probe calibration	11.000	11.000	normal (k=2)	2.0000	1.0000	5.500	5.500	∞	
B	Axial Isotropy	0.500	0.500	normal (k=2)	2.0000	1.0000	0.250	0.250	∞	
B	Hemispherical Isotropy	2.600	2.600	normal (k=2)	2.0000	1.0000	1.300	1.300	∞	
B	Spatial Resolution	0.500	0.500	Rectangular	1.7321	1.0000	0.289	0.289	∞	
B	Boundary Effect	0.769	0.769	Rectangular	1.7321	1.0000	0.444	0.444	∞	
B	Linearity	0.600	0.600	Rectangular	1.7321	1.0000	0.346	0.346	∞	
B	Detection Limits	0.200	0.200	Rectangular	1.7321	1.0000	0.115	0.115	∞	
B	Readout Electronics	0.560	0.560	normal (k=2)	2.0000	1.0000	0.280	0.280	∞	
B	Response Time	0.000	0.000	Rectangular	1.7321	1.0000	0.000	0.000	∞	
B	Integration Time	1.730	1.730	Rectangular	1.7321	1.0000	0.999	0.999	∞	
B	RF Ambient conditions	3.000	3.000	Rectangular	1.7321	1.0000	1.732	1.732	∞	
B	Probe Positioner Mechanical Restrictions	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Probe Positioning with regard to Phantom Shell	2.850	2.850	Rectangular	1.7321	1.0000	1.645	1.645	∞	
B	Extrapolation and integration/ Maximum SAR evaluation	5.080	5.080	Rectangular	1.7321	1.0000	2.933	2.933	∞	
A	Test Sample Positioning	0.584	0.584	normal (k=1)	1.0000	1.0000	0.584	0.584	10	
A	Device Holder uncertainty	0.154	0.154	normal (k=1)	1.0000	1.0000	0.154	0.154	10	
B	Phantom Uncertainty	4.000	4.000	Rectangular	1.7321	1.0000	2.309	2.309	∞	
B	Drift of output power	5.000	5.000	Rectangular	1.7321	1.0000	2.887	2.887	∞	
B	Liquid Conductivity (target value)	5.000	5.000	Rectangular	1.7321	0.6400	1.848	1.848	∞	
A	Liquid Conductivity (measured value)	4.170	4.170	normal (k=1)	1.0000	0.6400	2.669	2.669	5	
B	Liquid Permittivity (target value)	5.000	5.000	Rectangular	1.7321	0.6000	1.732	1.732	∞	
A	Liquid Permittivity (measured value)	4.230	4.230	normal (k=1)	1.0000	0.6000	2.538	2.538	5	
	Combined standard uncertainty			t-distribution			9.34	9.34	>400	
	Expanded uncertainty			k = 1.96			18.30	18.30	>400	