

SAR EVALUATION REPORT

For

American Telecom Services, Inc.

2466, Peck Road, City of Industry, CA 90601, U.S.A

FCC ID: UGX-X10002X

This Report Concerns: <input checked="" type="checkbox"/> Original Report		Equipment Type: 1.9GHZ VOIP Cordless Phone	
Test Engineer:	Eric Hong		
Report No.:	R0610124-SAR		
Report Date:	2006-10-19		
Reviewed By:	VP of Engineering: Hans Mellberg		
Prepared By: (HW)	Bay Area Compliance Laboratory Corporation 1274 Anvilwood Ave. Sunnyvale, CA 94089 Tel: (408) 732-9162 Fax: (408) 732 9164		

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DECLARATION OF COMPLIANCE, SAR EVALUATION

Rule Part(s):	CFR 47 2.1093
Test Procedure(s):	FCC OET Bulletin 65 Supplement C
Device Classification:	DECT Cordless Device
Device Type:	1.9GHz Cordless VOIP Phone
FCC ID:	UGX-X10002X
Modulation:	DECT
TX Frequency Range:	1921.536-1928.448 MHz
Max. Conducted Power Tested:	18.52 dBm (1924.992 MHz)
Antenna Type(s):	Internal, Integral Antenna
Body-Worn Accessories:	None
Face-Head Accessories:	None

**Max. SAR Level(s) Measured: 0.0633 mw/g (Head)
0.011mw/g (Body)**

BACL Corp. declares under its sole responsibility that this wireless portable device has been determined to be in compliance for localized specific absorption rate (SAR) for uncontrolled exposure and general population exposure limits specified in EN 50361:2001 and has been tested in accordance with the measurement procedures specified in ANSI IEEE C95.3:2002

All measurements reported herein were performed under my supervision and believed to be accurate to the best of my knowledge. I further attest for the completeness of these measurements and vouch for the qualifications any and all personnel performing such measurements.

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

Eric Hong

/signature/



Bay Area Compliance Laboratory Corp.



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REFERENCE, STANDARDS, AND GUIDELINES

FCC:

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

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

CE:

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

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

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

There was no SAR of any concern measured on the device for any of the investigated configurations.

SAR Limits

FCC Limit (1g)

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)

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

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

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

Population/uncontrolled environments Spatial Peak limit 1.6w/kg (FCC) & 2.0w/kg (CE) applied to the EUT.

EUT DESCRIPTION

American Telecom Services product, FCC ID: UGX-X10002X or the "EUT" as referred to in this report is a 1.9 GHz VOIP cordless phone, which measures approximately 125 mm(L) x 43 mm(W) x 21 mm(H).

** The test data gathered are from typical production sample provided by the manufacturer.*

DESCRIPTION OF TEST SYSTEM

These measurements were performed with the automated near-field scanning system DASY4 from Schmid & Partner Engineering AG (SPEAG) which is the fourth generation of the system shown in the figure hereinafter:



The system is based on a high precision robot (working range greater than 0.9m), which positions the probes with a positional repeatability of better than $\pm 0.02\text{mm}$. 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 ET3DV6 SN: 1604 (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 $\pm 10\%$. The spherical isotropy was evaluated with the procedure and found to be better than $\pm 0.25\text{dB}$.

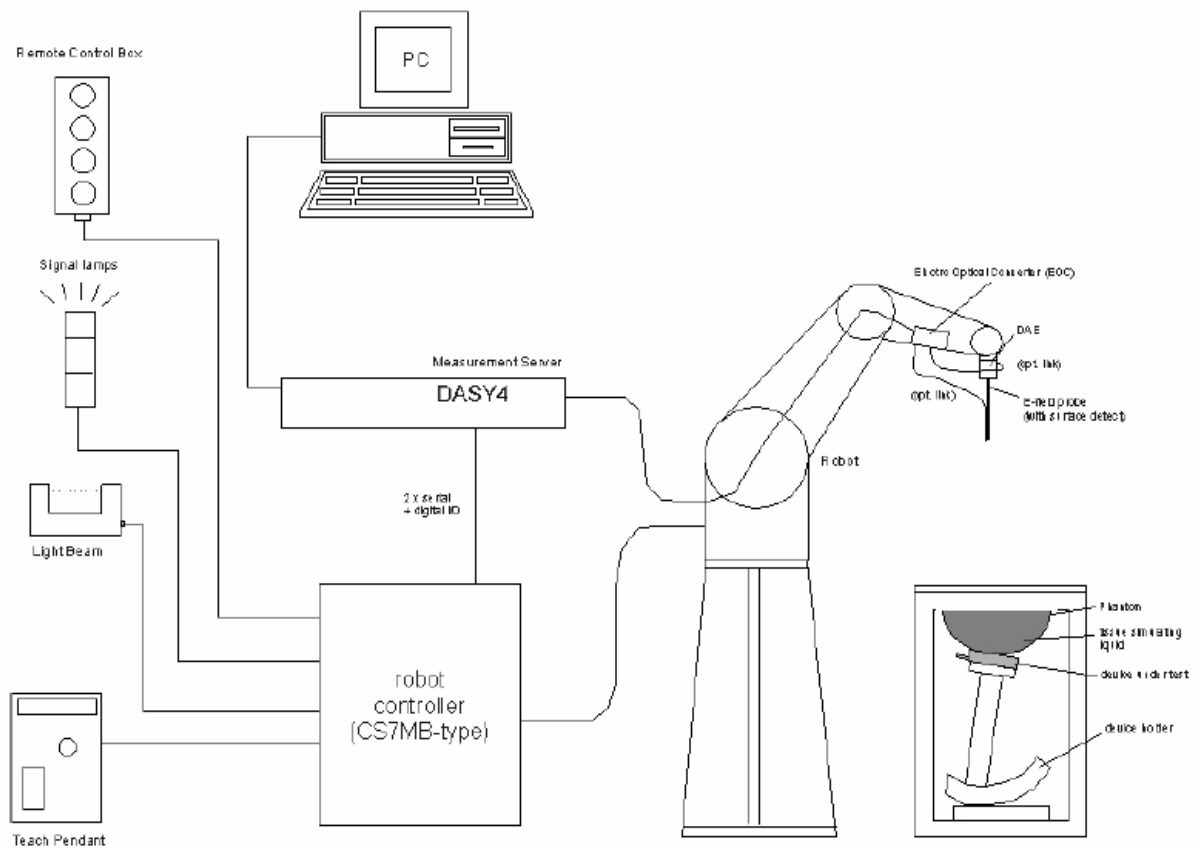
The phantom used was the Generic Twin Phantom". The ear was simulated as a spacer of 4 mm thickness between the earpiece of the phone and the tissue simulating liquid. The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (Nacl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton x-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (s/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

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

Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800-2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

Measurement System Diagram



The DASY4 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stäubli 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, AD-conversion, 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 2000 or Windows XP.

- DASY4 software.
- 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 to validate the proper functioning of the system.

System Components

- DASY4 Measurement Server
- Data Acquisition Electronics
- Probes
- Light Beam Unit
- Medium
- SAM Twin Phantom
- Device Holder for SAM Twin Phantom
- System Validation Kits
- Robot

DASY4 Measurement Server

The DASY4 measurement server is based on a PC/104 CPU board with a 166MHz low-power pentium, 32MB chip disk and 64MB RAM. The necessary circuits for communication with either the DAE4 (or DAE3) electronic box as well as the 16-bit AD-converter system for optical detection and digital I/O interface are contained on the DASY4 I/O-board, which is directly connected to the PC/104 bus of the CPU board.



The measurement server performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. The PC-operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with two expansion slots which are reserved for future applications. Please note that the expansion slots do not have a standardized pinout and therefore only the expansion cards provided by SPEAG can be inserted. Expansion cards from any other supplier could seriously damage the measurement server.

Data Acquisition Electronics

The data acquisition electronics DAE3 consists of a highly sensitive electrometer grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.



Probes

The DASY system can support many different probe types.

Dosimetric Probes: These probes are specially designed and calibrated for use in liquids with high permittivities. They should not be used in air, since the spherical isotropy in air is poor (± 2 dB). The dosimetric probes have special calibrations in various liquids at different frequencies.

Free Space Probes: These are electric and magnetic field probes specially designed for measurements in free space. The z-sensor is aligned to the probe axis and the rotation angle of the x-sensor is specified. This allows the DASY system to automatically align the probe to the measurement grid for field component measurement. The free space probes are generally not calibrated in liquid. (The H-field probes can be used in liquids without any change of parameters.)

Temperature Probes: Small and sensitive temperature probes for general use. They use a completely different parameter set and different evaluation procedures. Temperature rise features allow direct SAR evaluations with these probes.

ET3DV6 Probe Specification

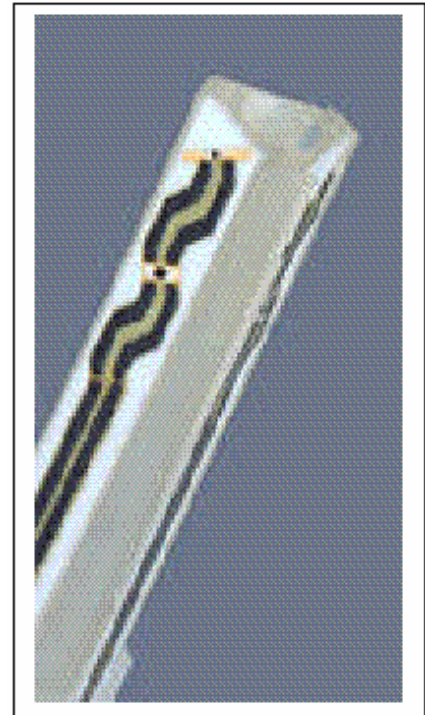
Construction Symmetrical design with triangular core
 Built-in optical fiber for surface detection System
 Built-in shielding against static charges
 Calibration In air from 10 MHz to 2.5 GHz
 In brain and muscle simulating tissue at
 Frequencies of 450 MHz, 900 MHz and
 1.8 GHz (accuracy $\pm 8\%$)
 Frequency 10 MHz to > 6 GHz; Linearity: ± 0.2 dB
 (30 MHz to 3 GHz)
 Directivity ± 0.2 dB in brain tissue (rotation around
 probe axis)
 ± 0.4 dB in brain tissue (rotation normal probe axis)
 Dynamic 5 mW/g to > 100 mW/g;
 Range Linearity: ± 0.2 dB
 Surface ± 0.2 mm repeatability in air and clear liquids
 Detection over diffuse reflecting surfaces.
 Dimensions Overall length: 330 mm
 Tip length: 16 mm



Photograph of the probe

Body diameter: 12 mm
 Tip diameter: 6.8 mm
 Distance from probe tip to dipole centers: 2.7 mm
 Application General dosimetric up to 3 GHz
 Compliance tests of mobile phones
 Fast automatic scanning in arbitrary phantoms

The SAR measurements were conducted with the dosimetric probe ET3DV6 designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi-fiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY3 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped when reaching the maximum.



**Inside view of
ET3DV6 E-field Probe**

E-Field Probe Calibration Process

Each probe is calibrated according to a dosimetric assessment procedure described in [6] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [7] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

Data Evaluation

The DASY4 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:

Probe parameters: - Sensitivity	Normi, ai0, ai1, ai2
- Conversion factor	ConvFi
- Diode compression point	dcpi

Device parameters: - Frequency	f
- Crest factor	cf
Media parameters: - Conductivity	σ
- Density	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multimeter 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 DC-transmission 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:

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

With V_i = compensated signal of channel i (i=x, y, z)
 U_i = input signal of channel i (i=x, y, z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

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

$$\text{E - fieldprobes : } E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConuF}}$$

$$\text{H - fieldprobes : } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

With V_i = compensated signal of channel i (i=x, y, z)
 $Norm_i$ = sensor sensitivity of channel i (i=x, y, z)
 $\mu\text{V}/(\text{V/m})^2$ for E-field probes
 ConF = sensitivity enhancement in solution
 a_{ij} = sensor sensitivity factors for H-field probes
 f = carrier frequency [GHz]
 E_i = electric field strenggy of channel i in V/m
 H_i = diode compression point (DASY parameter)

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

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

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

With SAR = local specific absorption rate in mW/g
 E_{tot} = 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, to account for actual brain density rather than the density of the simulation liquid.

Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, so that the robot coordinates are valid for the probe tip. The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.

Medium

Parameters

The parameters of the tissue simulating liquid strongly influence the SAR in the liquid. The parameters for the different frequencies are defined in the corresponding compliance standards (e.g., EN 50361, IEEE 1528-2003).

Parameter measurements

Several measurement systems are available for measuring the dielectric parameters of liquids:

- The open coax test method (e.g., HP85070 dielectric probe kit) is easy to use, but has only moderate accuracy. It is calibrated with open, short, and deionized water and the calibrations a critical process.
- The transmission line method (e.g., model 1500T from DAMASKOS, INC.) measures the transmission and reflection in a liquid filled high precision line. It needs standard two port calibration and is probably more accurate than the open coax method.
- The reflection line method measures the reflection in a liquid filled shorted precision lined. The method is not suitable for these liquids because of its low sensitivity.
- The slotted line method scans the field magnitude and phase along a liquid filled line. The evaluation is straight forward and only needs a simple response calibration. The method is very accurate, but can only be used in high loss liquids and at frequencies above 100 to 200MHz. Cleaning the line can be tedious.

SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region where shell thickness increases to 6mm). It has three measurement areas:

- Left hand
- Right hand
- Flat phantom

The phantom table comes in two sizes: A 100 x 50 x 85 cm (L x W x H) table for use with free standing robots (DASY4 professional system option) or as a second phantom and a 100 x 75 x 85 cm(L x W x H) table with reinforcements for table mounted robots (DASY4 compact system option) .

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. Only one device holder is necessary if two phantoms are used (e.g., for different liquids) A white cover is provided to tap the phantom during o_-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on the cover are possible. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

The phantom can be used with the following tissue simulating liquids:

- Water-sugar based liquids can be left permanently in the phantom. Always cover the liquid if the system is not used, otherwise the parameters will change due to water evaporation.
- Glycol based liquids should be used with care. As glycol is a softener for most plastics, the liquid should be taken out of the phantom and the phantom should be dried when the system is not used (desirable at least once a week).
- Do not use other organic solvents without previously testing the phantom resistiveness.



Device Holder for SAM Twin Phantom

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source in 5mm distance, a positioning uncertainty of $\pm 0.5\text{mm}$ would produce a SAR uncertainty of $\pm 20\%$. An accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions, in which the devices must be measured, are defined by the standards.

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centers for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.



The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon_r=3$ and loss tangent $\tan \delta=0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

System Validation Kits

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. For that purpose a well defined SAR distribution in the flat section of the SAM twin phantom is produced.

System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder. Dipoles are available for the variety of frequencies between 300MHz and 6 GHz (dipoles for other frequencies or media and other calibration conditions are available upon request).

The dipoles are highly symmetric and matched at the center frequency for the specified liquid and distance to the flat phantom (or flat section of the SAM-twin phantom). The accurate distance between the liquid surface and the dipole center is achieved with a distance holder that snaps on the dipole.

Robot

The DASY4 system uses the high precision industrial robots RX60L, RX90 and RX90L, as well as the RX60BL and RX90BL types out of the newer series from Stäubli SA (France). The RX robot series offers many features that are important for our application:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance-free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchronized motors; no stepper motors)
- Low ELF interference (the closed metallic construction shields against motor control fields)

For the newly delivered DASY4 systems as well as for the older DASY3 systems delivered since 1999, the CS7MB robot controller version from Stäubli is used. Previously delivered systems have either a CS7 or CS7M controller; the differences to the CS7MB are mainly in the hardware, but some procedures in the robot software from Stäubli are also not completely the same. The following descriptions about robot hard- and software correspond to CS7MB controller with software version 13.1 (edit S5). The actual commands, procedures and configurations, also including details in hardware, might differ if an older robot controller is in use. For further information, please contact the manufacturer.



TESTING EQUIPMENT

Equipments List & Calibration Info

Type / Model	Cal. Date	S/N:
DASY4 Professional Dosimetric System	N/A	N/A
Robot RX60L	N/A	CS7MBSP / 467
Robot Controller	N/A	F01/5J72A1/A/01
Dell Computer Dimension 3000	N/A	N/A
SPEAG EDC3	N/A	N/A
SPEAG DAE3	2005-10-18	456
DASY4 Measurement Server	N/A	1176
SPEAG E-Field Probe ET3DV6	2006-05-02	1604
SPEAG Generic Twin Phantom	N/A	N/A
SPEAG Light Alignment Sensor	N/A	278
APREL Validation Dipole D-1800-S-1	2006-08-28	BCL-049
Brain Equivalent Matter (1900MHz)	Each Use	N/A
Muscle Equivalent Matter (1900MHz)	Each Use	N/A
Robot Table	Each Use	N/A
Phone Holder	Each Use	N/A
Phantom Cover	Each Use	N/A
HP Spectrum Analyzer HP8566A	N/A	2240A01930
Microwave Amp. 8349A	N/A	2644A02662
Power Meter Agilent E4419B	2006-09-13	MY4121511
Power Sensor Agilent E4412A	2006-10-12	US38488542
Network Analyzer HP-8752C	2006-02-22	820079
Dielectric Probe Kit HP85070A	Each Use	US99360201
Signal Generator HP-83650B	2006-05-10	3614A002716
Amplifier, ST181-20	N/R	E012-0101
Antenna, Horn DRG-118A	2006-08-17	A052704
Analyzer, Communication, Agilent E5515C	2005-08-08	GB44051221

SAR MEASUREMENT SYSTEM VERIFICATION

System Accuracy Verification

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

IEEE P1528 recommended reference value for head

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

Validation Dipole SAR Reference Test Result for Body (1900 MHz)

Validation Measurement	SAR @ 0.126W Input averaged over 1g	SAR @ 1W Input averaged over 1g	SAR @ 0.126W Input averaged over 10g	SAR @ 1W Input averaged over 10g
Test 1	3.1	24.61	1.42	11.27
Test 2	3.1	24.61	1.41	11.20
Test 3	3.2	25.41	1.43	11.35
Test 4	3.2	25.41	1.42	11.27
Test 5	3.1	24.61	1.42	11.27
Test 6	3.2	25.61	1.41	11.20
Test 7	3.2	25.61	1.43	11.35
Test 8	3.1	24.61	1.42	11.27
Test 9	3.1	24.61	1.42	11.27
Test 10	3.1	24.61	1.43	11.35
Average	3.14	24.97	1.421	11.28

EUT TEST STRATEGY AND METHODOLOGY

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.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 3.9 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 20 mm x 20 mm. Based on these data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

1. The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2 mm. The extrapolation was based on a least square algorithm [11]. 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) [11], [12]. The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
3. 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.

CONCLUSION

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

SAR Test Data

Environmental Conditions

Ambient Temperature:	21° C
Relative Humidity:	71%
ATM Pressure:	1024 mbar

* Testing was performed by Eric Hong on 2006-10-16.

EUT position	Freq (MHz)	Output Power (mW)	Phantom	Measured (mW/1g)	Limit (mW/g)	Plot #
Left head tilt	1924.992	71.1	Head	0.0633	1.6	1
Left head touch	1924.992	71.1	Head	0.026	1.6	2
Right head tilt	1924.992	71.1	Head	0.019	1.6	3
Right head touch	1924.992	71.1	Head	0.024	1.6	4
1.5 cm separation to flat phantom with headset	1924.992	71.1	Body	0.011	1.6	5

APPENDIX A – MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the DASY4 measurement system and is given in the following Table.

DASY4 Uncertainty Budget According to IEEE 1528 [1]								
Error Description	Uncertainty value	Prob. Dist.	Div.	(c_i) 1g	(c_i) 10g	Std. Unc. (1g)	Std. Unc. (10g)	(v_i) v_{eff}
Measurement System								
Probe Calibration	±5.9%	N	1	1	1	±5.9%	±5.9%	∞
Axial Isotropy	±4.7%	R	$\sqrt{3}$	0.7	0.7	±1.9%	±1.9%	∞
Hemispherical Isotropy	±9.6%	R	$\sqrt{3}$	0.7	0.7	±3.9%	±3.9%	∞
Boundary Effects	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Linearity	±4.7%	R	$\sqrt{3}$	1	1	±2.7%	±2.7%	∞
System Detection Limits	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Readout Electronics	±0.3%	N	1	1	1	±0.3%	±0.3%	∞
Response Time	±0.8%	R	$\sqrt{3}$	1	1	±0.5%	±0.5%	∞
Integration Time	±2.6%	R	$\sqrt{3}$	1	1	±1.5%	±1.5%	∞
RF Ambient Conditions	±3.0%	R	$\sqrt{3}$	1	1	±1.7%	±1.7%	∞
Probe Positioner	±0.4%	R	$\sqrt{3}$	1	1	±0.2%	±0.2%	∞
Probe Positioning	±2.9%	R	$\sqrt{3}$	1	1	±1.7%	±1.7%	∞
Max. SAR Eval.	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Test Sample Related								
Device Positioning	±2.9%	N	1	1	1	±2.9%	±2.9%	145
Device Holder	±3.6%	N	1	1	1	±3.6%	±3.6%	5
Power Drift	±5.0%	R	$\sqrt{3}$	1	1	±2.9%	±2.9%	∞
Phantom and Setup								
Phantom Uncertainty	±4.0%	R	$\sqrt{3}$	1	1	±2.3%	±2.3%	∞
Liquid Conductivity (target)	±5.0%	R	$\sqrt{3}$	0.64	0.43	±1.8%	±1.2%	∞
Liquid Conductivity (meas.)	±2.5%	N	1	0.64	0.43	±1.6%	±1.1%	∞
Liquid Permittivity (target)	±5.0%	R	$\sqrt{3}$	0.6	0.49	±1.7%	±1.4%	∞
Liquid Permittivity (meas.)	±2.5%	N	1	0.6	0.49	±1.5%	±1.2%	∞
Combined Std. Uncertainty						±10.8%	±10.6%	330
Expanded STD Uncertainty						±21.6%	±21.1%	

DASY4 Uncertainty Budget

According to CENELEC EN 50361 [2]

Error Description	Uncertainty value	Prob. Dist.	Div.	(c_i) 1g	(c_i) 10g	Std. Unc. (1g)	Std. Unc. (10g)	(v_i) v_{eff}
Measurement Equipment								
Probe Calibration	±5.9%	N	1	1	1	±5.9%	±5.9%	∞
Axial Isotropy	±4.7%	R	$\sqrt{3}$	0.7	0.7	±1.9%	±1.9%	∞
Spherical Isotropy	±9.6%	R	$\sqrt{3}$	0.7	0.7	±3.9%	±3.9%	∞
Probe Linearity	±4.7%	R	$\sqrt{3}$	1	1	±2.7%	±2.7%	∞
Detection Limit	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Boundary Effects	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Readout Electronics	±0.3%	N	1	1	1	±0.3%	±0.3%	∞
Response Time	±0.8%	N	1	1	1	±0.8%	±0.8%	∞
Noise	±0%	N	1	1	1	±0%	±0%	∞
Integration Time	±2.6%	N	1	1	1	±2.6%	±2.6%	∞
Mechanical Constraints								
Scanning System	±0.4%	R	$\sqrt{3}$	1	1	±0.2%	±0.2%	∞
Phantom Shell	±4.0%	R	$\sqrt{3}$	1	1	±2.3%	±2.3%	∞
Probe Positioning	±2.9%	R	$\sqrt{3}$	1	1	±1.7%	±1.7%	∞
Device Positioning	±2.9%	N	1	1	1	±2.9%	±2.9%	145
Physical Parameters								
Liquid Conductivity (target)	±5.0%	R	$\sqrt{3}$	0.7	0.5	±2.0%	±1.4%	∞
Liquid Conductivity (meas.)	±4.3%	R	$\sqrt{3}$	0.7	0.5	±1.7%	±1.2%	∞
Liquid Permittivity (target)	±5.0%	R	$\sqrt{3}$	0.6	0.5	±1.7%	±1.4%	∞
Liquid Permittivity (meas.)	±4.3%	R	$\sqrt{3}$	0.6	0.5	±1.5%	±1.2%	∞
Power Drift	±5.0%	R	$\sqrt{3}$	1	1	±2.9%	±2.9%	∞
RF Ambient Conditions	±3.0%	R	$\sqrt{3}$	1	1	±1.7%	±1.7%	∞
Post-Processing								
Extrap. and Integration	±1.0%	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Combined Std. Uncertainty						± 10.9%	± 10.6%	18125
Expanded Std. Uncertainty						±21.7%	±12.1%	

APPENDIX B – PROBE CALIBRATION CERTIFICATES

**Calibration Laboratory of
Schmid & Partner
Engineering AG**
Zeughausstrasse 43, 8004 Zurich, Switzerland



S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
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Accredited by the Swiss Federal Office of Metrology and Accreditation
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 108**

Client **Bay Area**

Certificate No: **ET3-1604_May06**

CALIBRATION CERTIFICATE

Object **ET3DV6 - SN: 1604**

Calibration procedure(s) **QA CAL-01.v5 and QA CAL-12.v4
Calibration procedure for dosimetric E-field probes**

Calibration date: **May 2, 2006**

Condition of the calibrated item **In Tolerance**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	5-Apr-06 (METAS, No. 251-00557)	Apr-07
Power sensor E4412A	MY41495277	5-Apr-06 (METAS, No. 251-00557)	Apr-07
Power sensor E4412A	MY41498087	5-Apr-06 (METAS, No. 251-00557)	Apr-07
Reference 3 dB Attenuator	SN: S5054 (3c)	11-Aug-05 (METAS, No. 251-00499)	Aug-06
Reference 20 dB Attenuator	SN: S5086 (20b)	4-Apr-06 (METAS, No. 251-00558)	Apr-07
Reference 30 dB Attenuator	SN: S5129 (30b)	11-Aug-05 (METAS, No. 251-00500)	Aug-06
Reference Probe ES3DV2	SN: 3013	2-Jan-06 (SPEAG, No. ES3-3013_Jan06)	Jan-07
DAE4	SN: 654	2-Feb-06 (SPEAG, No. DAE4-654_Feb06)	Feb-07
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
RF generator HP 8648C	US3642U01700	4-Aug-99 (SPEAG, in house check Nov-05)	In house check: Nov-07
Network Analyzer HP 8753E	US37390585	18-Oct-01 (SPEAG, in house check Nov-05)	In house check: Nov 06

Calibrated by:	Name Katja Pokovic	Function Technical Manager	Signature
Approved by:	Name Niels Kuster	Function Quality Manager	Signature

Issued: May 3, 2006

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

**Calibration Laboratory of
Schmid & Partner
Engineering AG**
Zeughausstrasse 43, 8004 Zurich, Switzerland



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The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 108**

Glossary:

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- CENELEC EN 50361, "Basic standard for the measurement of Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz - 3 GHz), July 2001

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}**: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not effect the E²-field uncertainty inside TSL (see below *ConvF*).
- NORM(f)_{x,y,z} = NORM_{x,y,z} * frequency_response** (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of *ConvF*.
- DCP_{x,y,z}**: DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * *ConvF* whereby the uncertainty corresponds to that given for *ConvF*. A frequency dependent *ConvF* is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.

ET3DV6 SN:1604

May 2, 2006

Probe ET3DV6

SN:1604

Manufactured:	July 30, 2001
Last calibrated:	March 18, 2005
Recalibrated:	May 2, 2006

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

ET3DV6 SN:1604

May 2, 2006

DASY - Parameters of Probe: ET3DV6 SN:1604**Sensitivity in Free Space^A****Diode Compression^B**

NormX	1.87 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP X	93 mV
NormY	1.80 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP Y	93 mV
NormZ	1.91 ± 10.1%	$\mu\text{V}/(\text{V}/\text{m})^2$	DCP Z	93 mV

Sensitivity in Tissue Simulating Liquid (Conversion Factors)

Please see Page 8.

Boundary Effect**TSL 900 MHz Typical SAR gradient: 5 % per mm**

Sensor Center to Phantom Surface Distance		3.7 mm	4.7 mm
SAR _{be} [%]	Without Correction Algorithm	7.9	4.1
SAR _{be} [%]	With Correction Algorithm	0.1	0.2

TSL 1810 MHz Typical SAR gradient: 10 % per mm

Sensor Center to Phantom Surface Distance		3.7 mm	4.7 mm
SAR _{be} [%]	Without Correction Algorithm	7.0	4.1
SAR _{be} [%]	With Correction Algorithm	0.1	0.3

Sensor OffsetProbe Tip to Sensor Center **2.7 mm**

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor k=2, which for a normal distribution corresponds to a coverage probability of approximately 95%.

^A The uncertainties of NormX,Y,Z do not affect the E²-field uncertainty inside TSL (see Page 8).

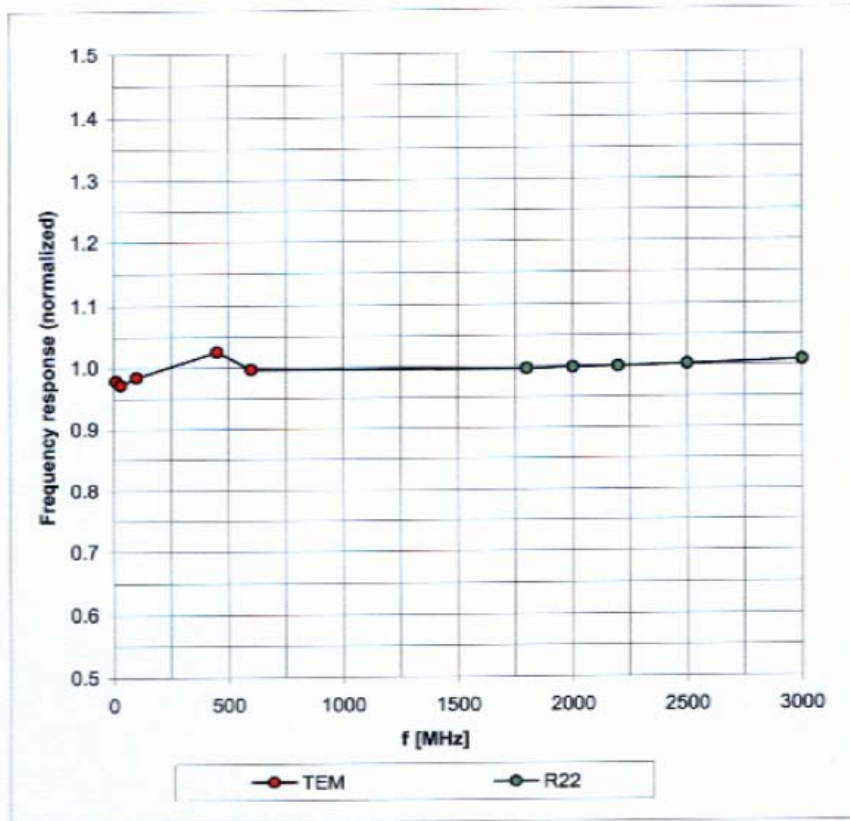
^B Numerical linearization parameter: uncertainty not required.

ET3DV6 SN:1604

May 2, 2006

Frequency Response of E-Field

(TEM-Cell: ifi110 EXX, Waveguide: R22)

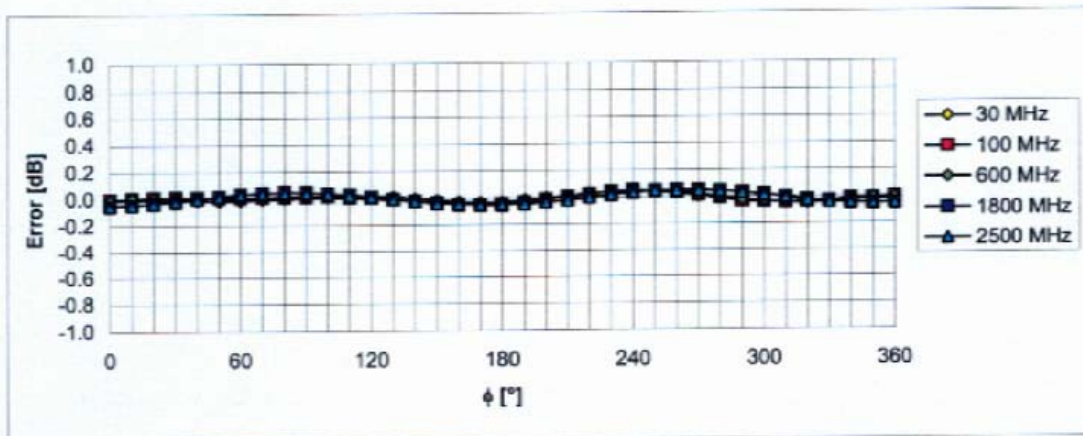
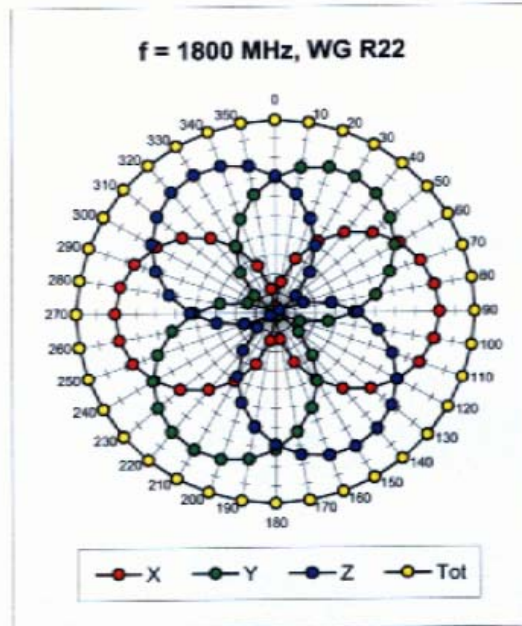
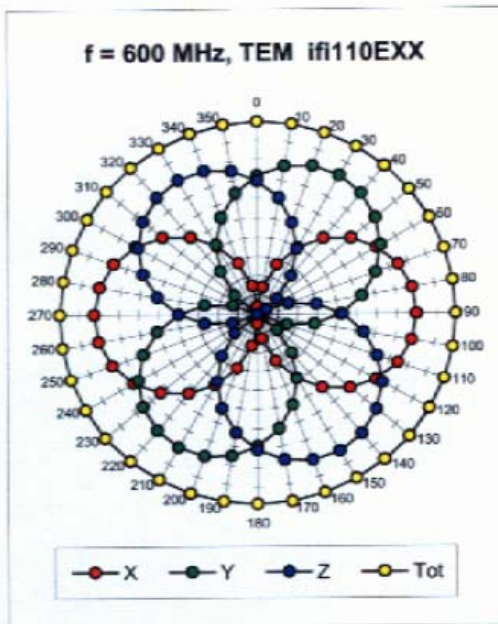


Uncertainty of Frequency Response of E-field: $\pm 6.3\%$ (k=2)

ET3DV6 SN:1604

May 2, 2006

Receiving Pattern (ϕ), $\vartheta = 0^\circ$

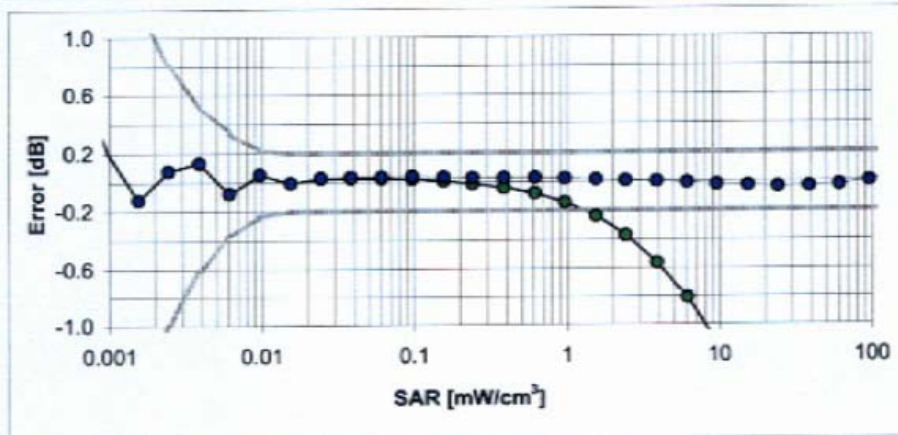
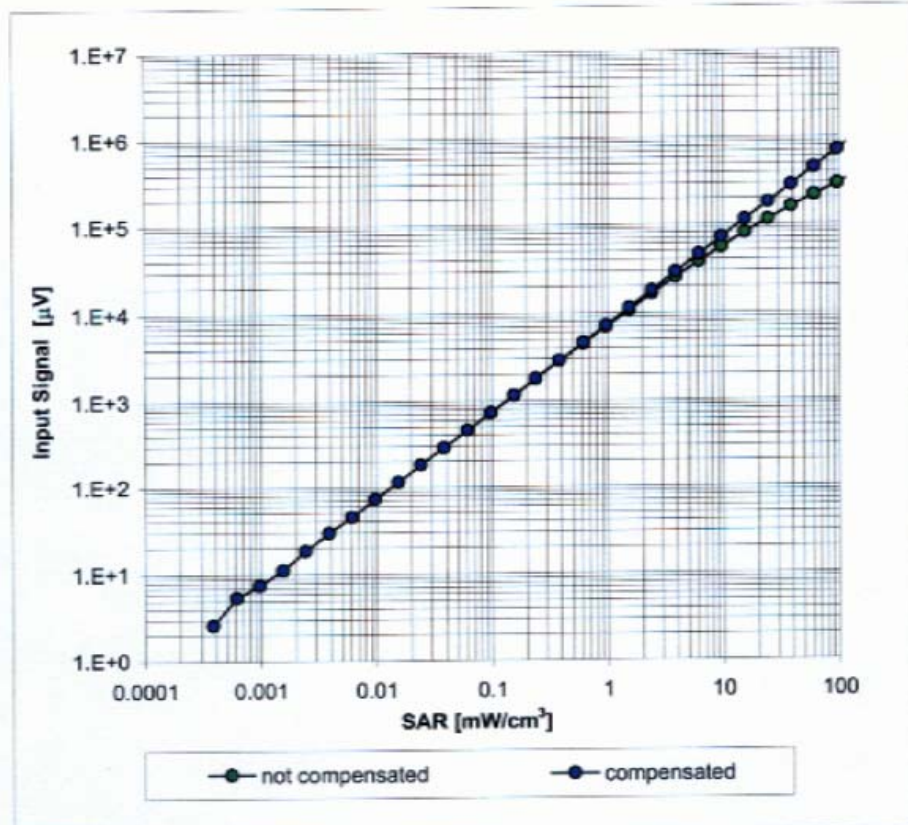


Uncertainty of Axial Isotropy Assessment: $\pm 0.5\%$ ($k=2$)

ET3DV6 SN:1604

May 2, 2006

Dynamic Range f(SAR_{head}) (Waveguide R22, f = 1800 MHz)

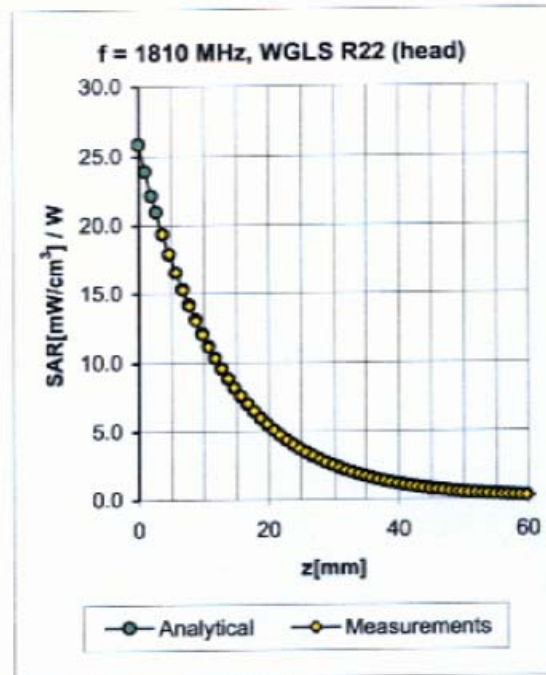
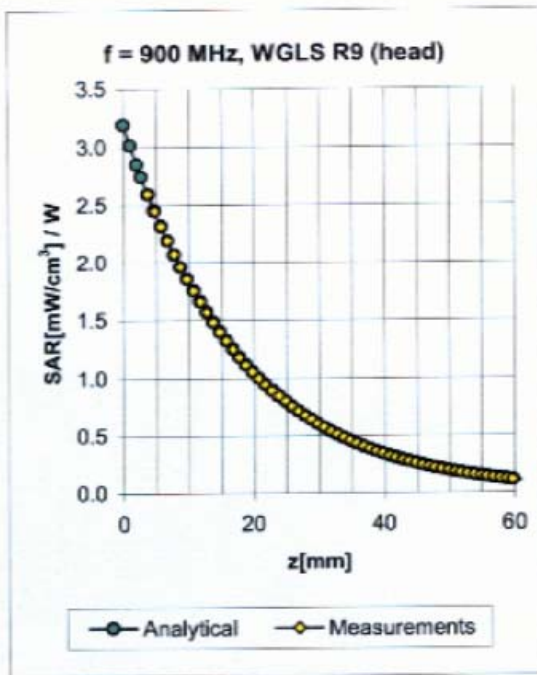


Uncertainty of Linearity Assessment: $\pm 0.6\%$ (k=2)

ET3DV6 SN:1604

May 2, 2006

Conversion Factor Assessment



f [MHz]	Validity [MHz] ^c	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
450	± 50 / ± 100	Head	43.5 ± 5%	0.87 ± 5%	0.26	2.94	7.14 ± 13.3% (k=2)
900	± 50 / ± 100	Head	41.5 ± 5%	0.97 ± 5%	0.56	1.81	6.60 ± 11.0% (k=2)
1810	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.50	2.59	5.29 ± 11.0% (k=2)
2450	± 50 / ± 100	Head	39.2 ± 5%	1.80 ± 5%	0.68	1.85	4.60 ± 11.8% (k=2)
450	± 50 / ± 100	Body	56.7 ± 5%	0.94 ± 5%	0.25	4.44	7.42 ± 13.3% (k=2)
900	± 50 / ± 100	Body	55.0 ± 5%	1.05 ± 5%	0.47	2.08	6.27 ± 11.0% (k=2)
1810	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.56	2.66	4.88 ± 11.0% (k=2)
2450	± 50 / ± 100	Body	52.7 ± 5%	1.95 ± 5%	0.66	1.95	4.27 ± 11.8% (k=2)

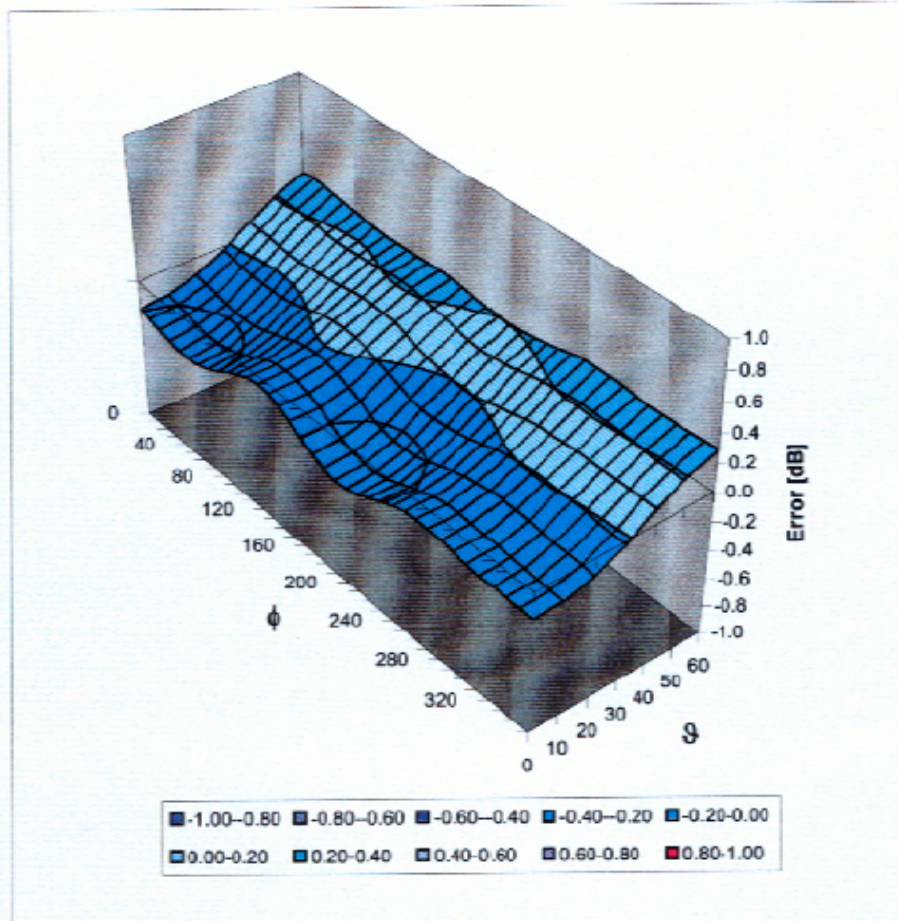
^c The validity of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2). The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band.

ET3DV6 SN:1604

May 2, 2006

Deviation from Isotropy in HSL

Error (ϕ, θ), $f = 900$ MHz



Uncertainty of Spherical Isotropy Assessment: $\pm 2.6\%$ ($k=2$)

NCL CALIBRATION LABORATORIES

Calibration File No: DC-712
Project Number: BACB-CAL-D-1800-5248

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.

BACL Validation Dipole

Manufacturer: APREL Laboratories
Part number: D-1800-S-1
Frequency: 1800 MHz
Serial No: BCL-049

Customer: Bay Area Compliance Laboratory

Calibrated: 25th August 2006
Released on: 28th August 2006

Released By: _____

NCL CALIBRATION LABORATORIES

51 SPECTRUM WAY
NEPEAN, ONTARIO
CANADA K2R 1E6

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

*verified
me
2006-8-31*

NCL Calibration Laboratories

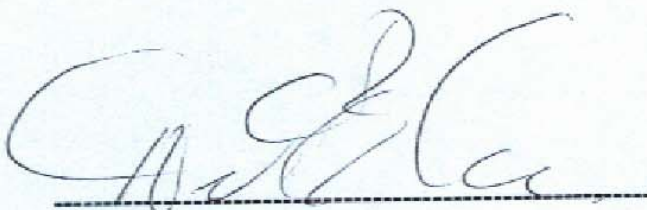
Division of APREL Laboratories.

Conditions

Dipole BCL-049 received from customer, with the attribute of having a repair to one radial arm, in good condition for re-calibration. SMA connector cleaned prior to calibration.

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

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



D. Brooks
Member of Engineering Staff
(Calibration Engineer)

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

NCL Calibration Laboratories

Division of APREL Laboratories.

Calibration Results Summary

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

Mechanical Dimensions

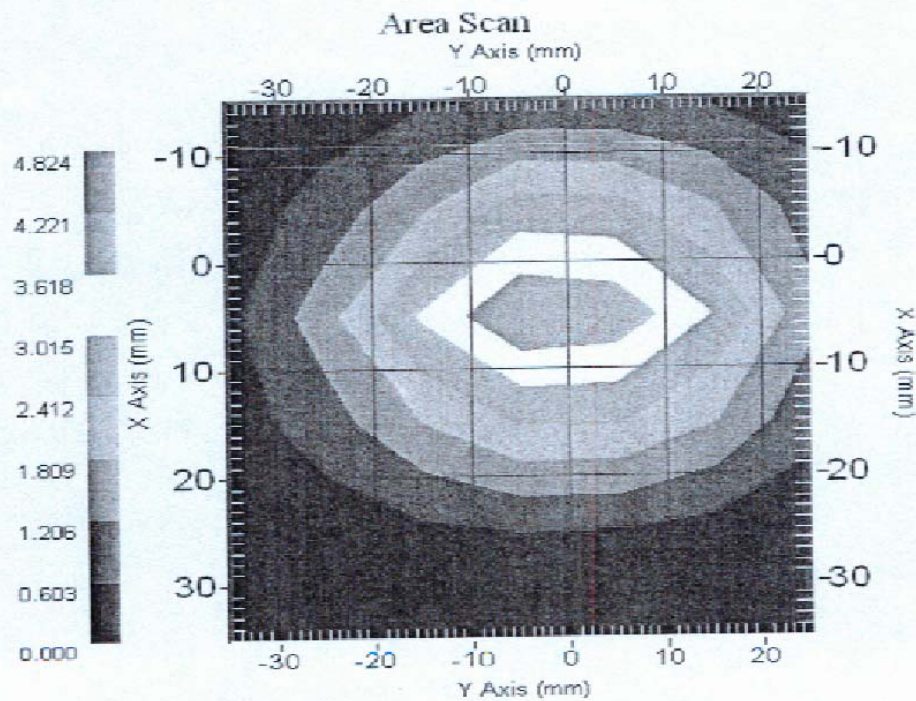
Length: 72.0 mm
Height: 41.7 mm

Electrical Specification

SWR: 1.072 U
Return Loss: -29.07 dB
Impedance: 50.62 Ω

System Validation Results

Frequency	1 Gram	10 Gram	Peak
1800 MHz	38.81	20.01	71.56



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

NCL Calibration Laboratories

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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 BCL-049. The calibration routine consisted of a three-step process. Step 1 was a mechanical verification of the dipole to ensure that it meets the mechanical specifications. Step 2 was an Electrical Calibration for the Validation Dipole, where the SWR, Impedance, and the Return loss were assessed. Step 3 involved a System Validation using the ALSAS-10U, along with APREL E-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure
SSI-TP-016 Tissue Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

Conditions

Dipole BCL-049 received from customer in good condition, with the attribute of a repair of one radial arm.

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

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

4

NCL Calibration Laboratories

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Dipole Calibration Results**Mechanical Verification**

APREL Length	APREL Height	Measured Length	Measured Height
72.0 mm	41.7 mm	71.6 mm	41.7 mm

Tissue Validation

Head Tissue 1800 MHz	Measured
Dielectric constant, ϵ_r	40.0
Conductivity, σ [S/m]	1.40

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Electrical Calibration

Test	Result
S11 R/L	-29.07 dB
SWR	1.072 U
Impedance	50.62 Ω

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

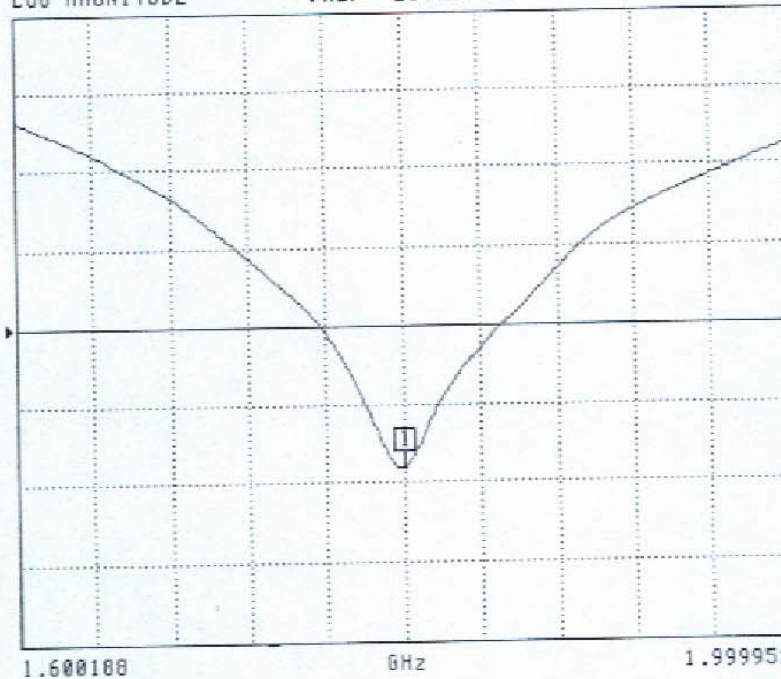
S11 Parameter Return Loss

S22 REVERSE REFLECTION

LOG MAGNITUDE

REF = -20.000 dB

5.000 dB/DIV



CH 4 - S22
REFERENCE PLANE
0.0000 mm

MARKER 1
1.800078 GHz
-29.068 dB

MARKER TO MAX
MARKER TO MIN

MARKER READOUT
FUNCTIONS

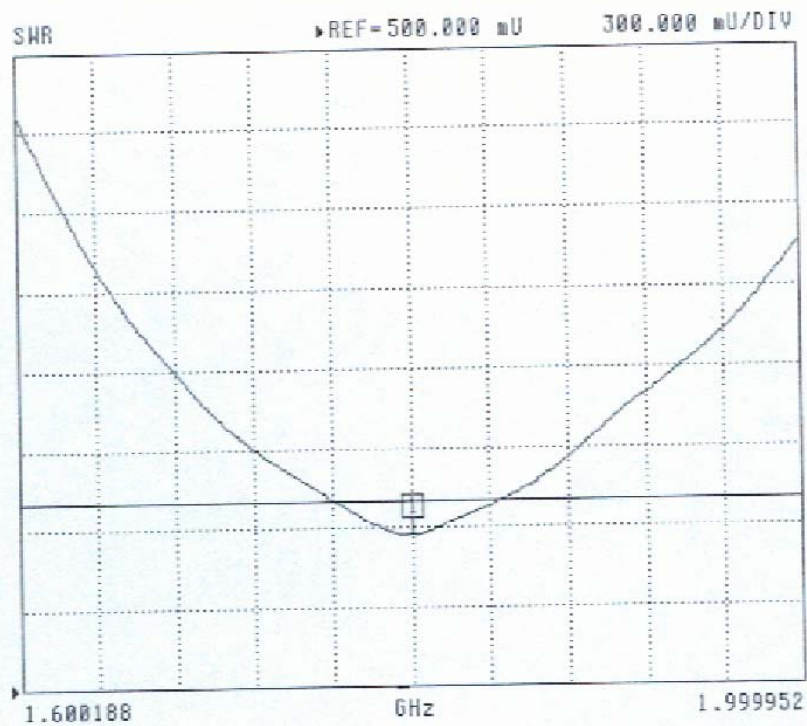
This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

Division of APREL Laboratories.

SWR

S22 REVERSE REFLECTION



CH 4 - S22
REFERENCE PLANE
0.0000 mm

MARKER 1
1.800070 GHz
1.072 U

MARKER TO MAX
MARKER TO MIN

MARKER READOUT
FUNCTIONS

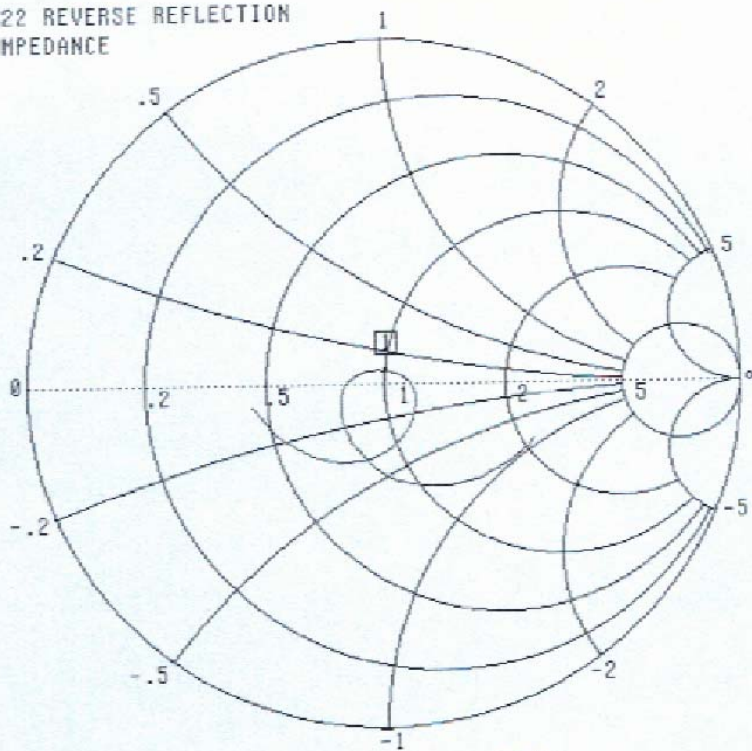
This page has been reviewed for content and attested to by signature within this document.

NCL Calibration Laboratories

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Smith Chart Dipole Impedance

S22 REVERSE REFLECTION
IMPEDANCE



CH 4 - S22
REFERENCE PLANE
0.0000 mm

MARKER 1
1.800070 GHz
50.624 Ω
3.543 $j\Omega$

MARKER TO MAX
▶ MARKER TO MIN

MARKER READOUT
FUNCTIONS

1.600188 - 1.999952 GHz

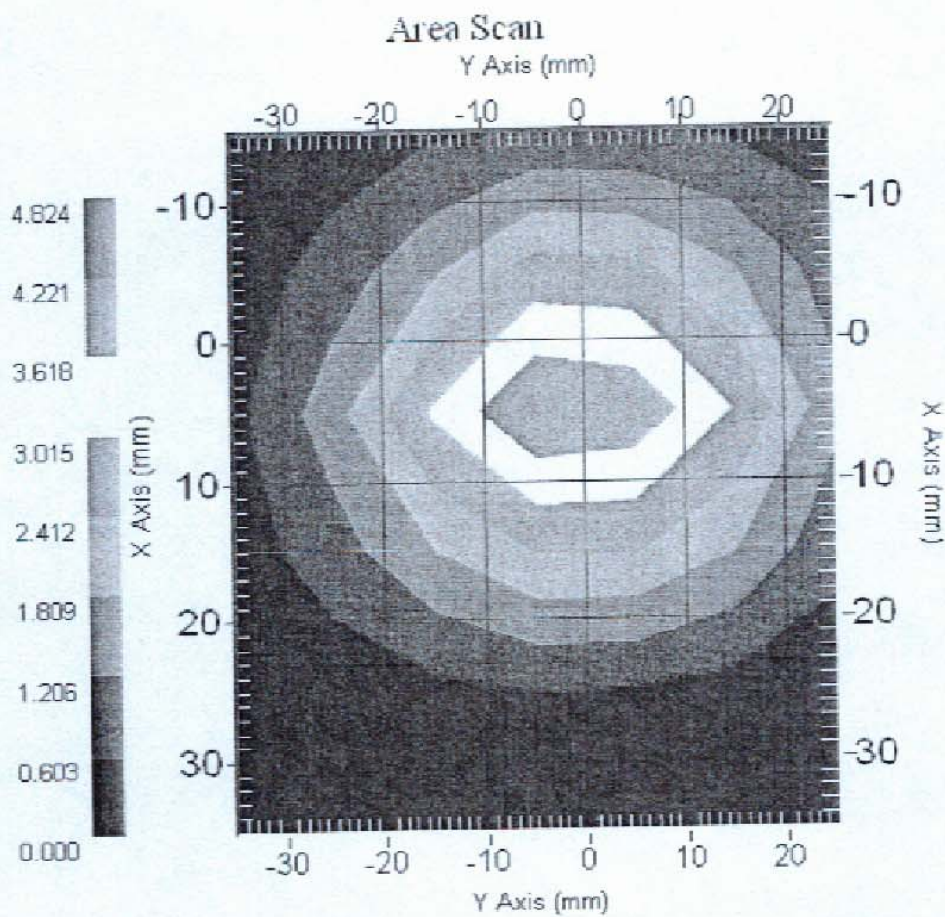
This page has been reviewed for content and attested to by signature within this document.

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System Validation Results Using the Electrically Calibrated Dipole

Head Tissue Frequency	1 Gram	10 Gram	Peak Above Feed Point
1800 MHz	38.81	20.01	71.56



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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

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

APPENDIX D - TEST SYSTEM VERIFICATIONS SCANS

Liquid Measurement Result

Simulant	Freq [MHz]	Parameters	Liquid Temp [°C]	Target Value	Measured Value	Deviation [%]	Limits [%]
Head	1900	ϵ	22	40.0	39.8	-0.25%	± 5
		σ	22	1.40	1.37	-0.71%	± 5
		1g SAR	22	39.7	38.8	-2.275	± 10
Body	1900	ϵ	22	53.3	51.4	-3.75%	± 5
		σ	22	1.52	1.52	-0.66%	± 5
		1g SAR	22	24.97	24.17	-3.20%	± 10

ϵ_r = relative permittivity, σ = conductivity and $\rho=1000\text{kg/m}^3$

Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**Head System Validation****DUT: Dipole 1800 MHz; Type: D-1800-S-1; Serial Number: BCL-049**

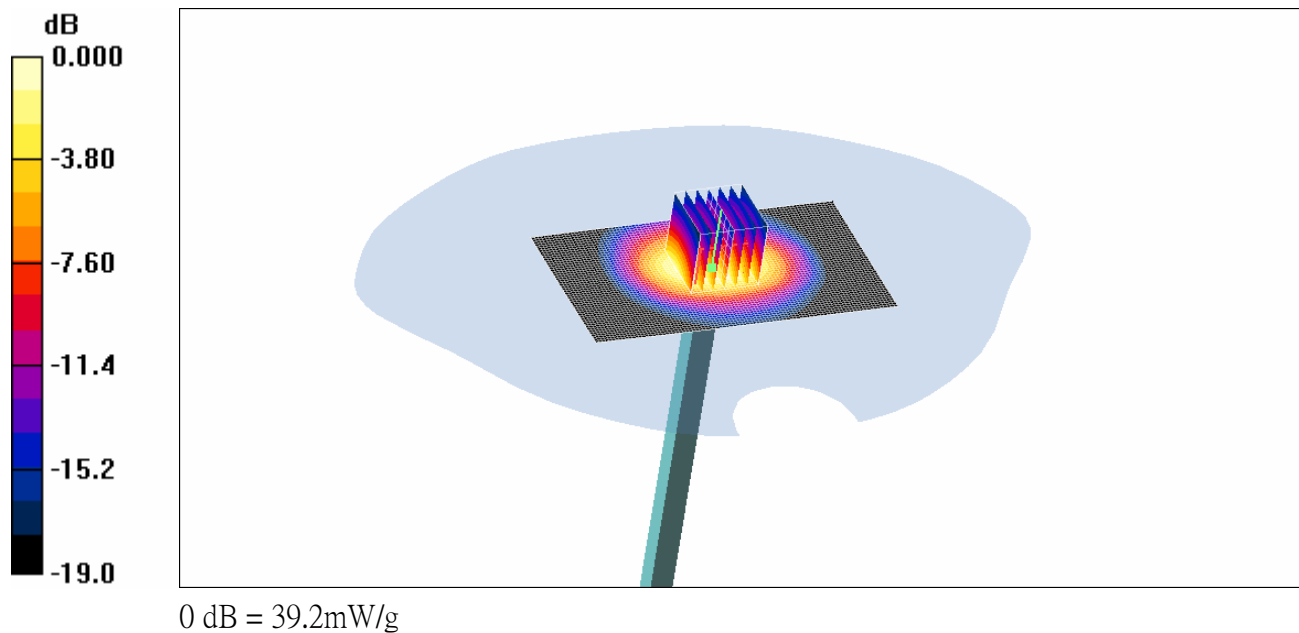
Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 1900$ MHz; $\sigma = 1.37$ mho/m; $\epsilon_r = 39.8$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF (5.29, 5.29, 5.29); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

d=10mm, Pin=1W /Area Scan (51x91x1): Measurement grid: dx=15mm, dy=15mm
 Maximum value of SAR (interpolated) = 38.5 mW/g

d=10mm, Pin=1W /Zoom Scan (7x7x7) /Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
 Reference Value = 161.3 V/m; Power Drift = -0.154 dB
 Peak SAR (extrapolated) = 45.4 W/kg
SAR(1 g) = 38.8 mW/g; SAR(10 g) = 19.6 mW/g
 Maximum value of SAR (measured) = 39.2 mW/g



Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**Body System Validation****DUT: Dipole 1800 MHz; Type: D-1800-S-1; Serial Number: BCL-049**

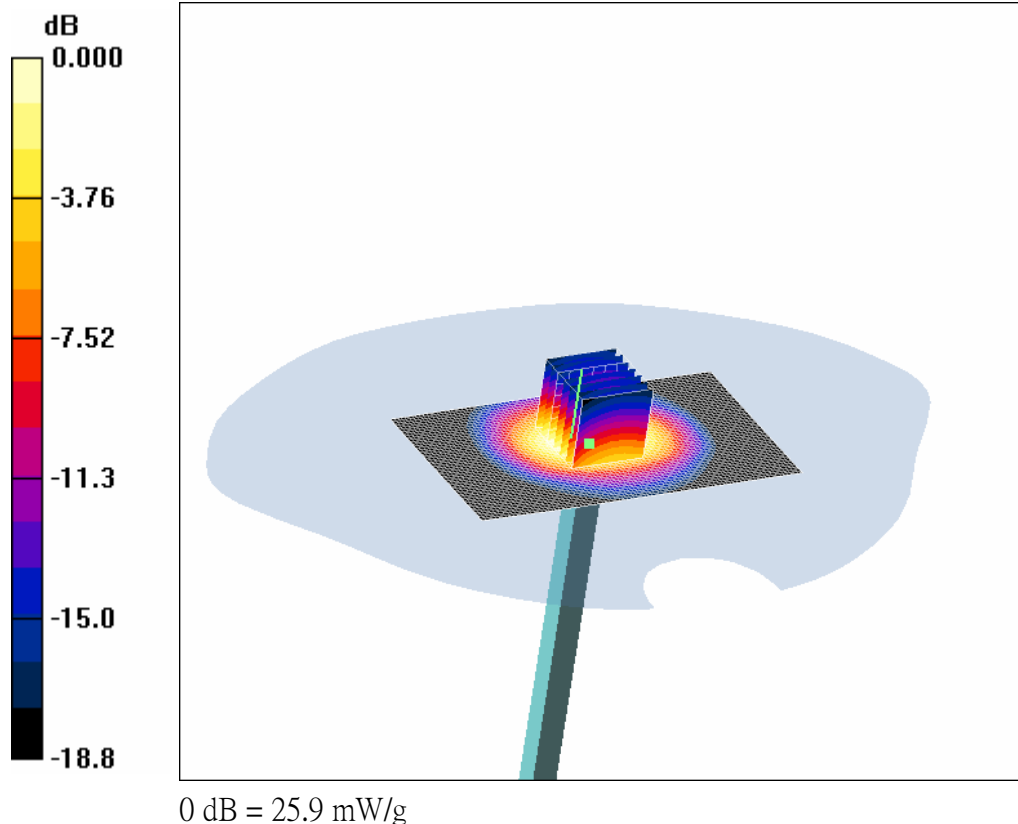
Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 1900$ MHz; $\sigma = 1.52$ mho/m; $\epsilon_r = 51.4$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(4.88, 4.88, 4.88); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

d=10mm, Pin=1W /Area Scan (51x91x1): Measurement grid: dx=15mm, dy=15mm
 Maximum value of SAR (interpolated) = 25.2 mW/g

d=10mm, Pin=1W /Zoom Scan (7x7x7) /Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
 Reference Value = 151.7 V/m; Power Drift = 0.000 dB
 Peak SAR (extrapolated) = 26.9 W/kg
SAR(1 g) = 24.17 mW/g; SAR(10 g) = 15.1 mW/g
 Maximum value of SAR (measured) = 25.9 mW/g



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

Left Head Tilt (Middle Channel)

American Telecom Services; DUT Type: X10002X

Communication System: DECT; Frequency: 1924.992 MHz; Duty Cycle: 1:12
 Medium parameters used: $f = 1910$ MHz; $\sigma = 1.39$ mho/m; $\epsilon_r = 39.9$; $\rho = 1000$ kg/m³
 Phantom section: Left Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(5.29, 5.29, 5.29); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

Left Head Tilt/Area Scan (61x81x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (interpolated) = 0.09 mW/g

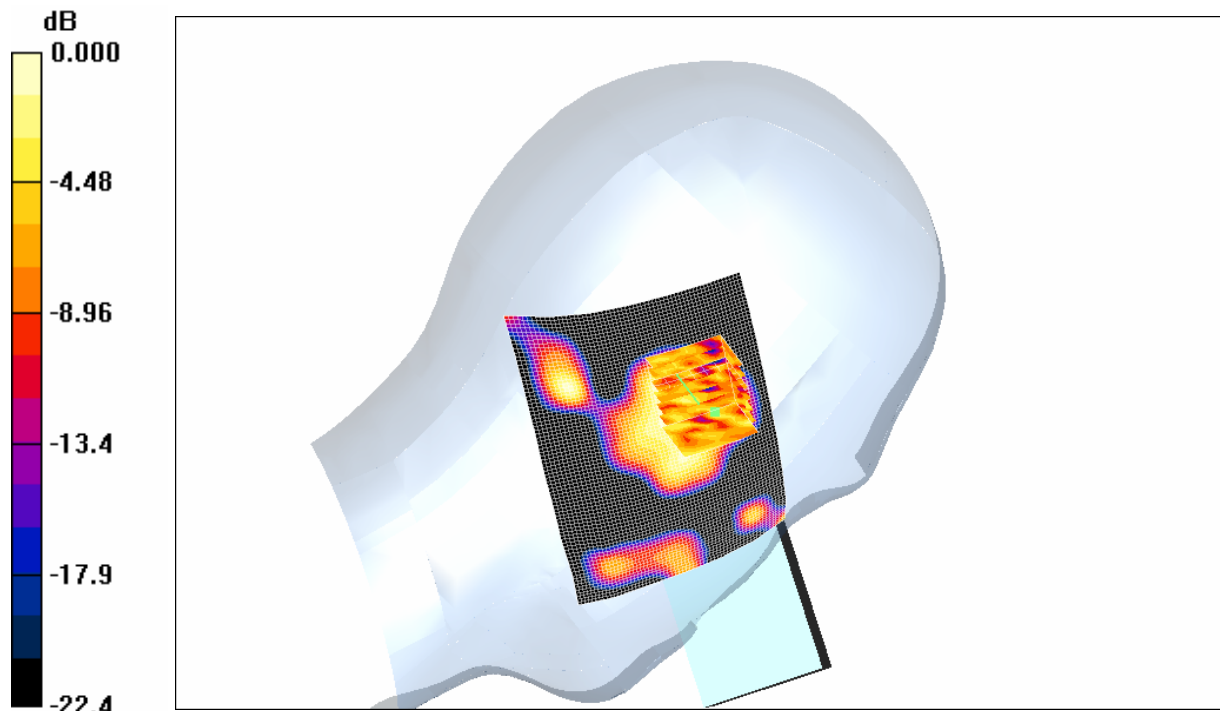
Left Head Tilt/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 1.89 V/m; Power Drift = -0.040 dB

Peak SAR (extrapolated) = 0.074 W/kg

SAR(1 g) = 0.0633 mW/g; SAR(10 g) = 0.0189 mW/g

Maximum value of SAR (measured) = 0.07 mW/g



0 dB = 0.07 mW/g

Plot #1

Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**Left Head Touch (Middle Channel)****American Telecom Services; DUT Type: X10002X**

Communication System: DECT; Frequency: 1924.992 MHz; Duty Cycle: 1:12
 Medium parameters used: $f = 1910$ MHz; $\sigma = 1.39$ mho/m; $\epsilon_r = 39.9$; $\rho = 1000$ kg/m³
 Phantom section: Left Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(5.29, 5.29, 5.29); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

Left Head Touch /Area Scan (61x81x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (interpolated) = 0.030 mW/g

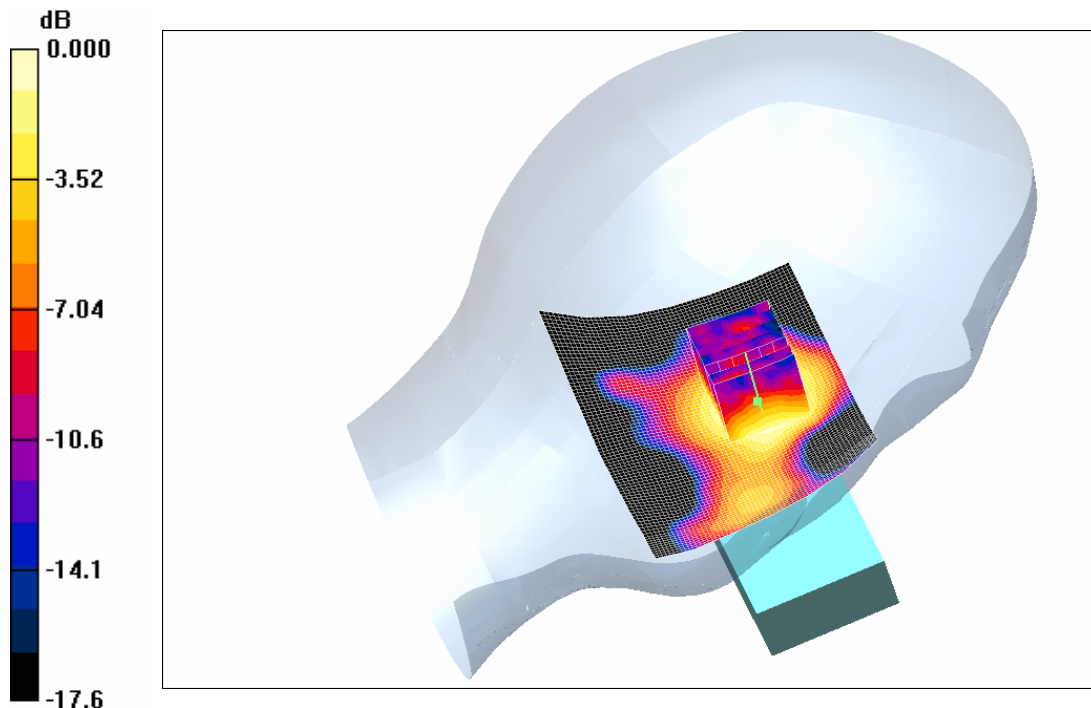
Left Head Touch /Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 3.42 V/m; Power Drift = 0.181 dB

Peak SAR (extrapolated) = 0.039 W/kg

SAR(1 g) = 0.026 mW/g; SAR(10 g) = 0.016 mW/g

Maximum value of SAR (measured) = 0.028 mW/g



0 dB = 0.028 mW/g

Plot#2

Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**Right Head Touch (Middle Channel)****American Telecom Services; DUT Type: X10002X**

Communication System: DECT; Frequency: 1924.992 MHz; Duty Cycle: 1:12

Medium parameters used: $f = 1910$ MHz; $\sigma = 1.39$ mho/m; $\epsilon_r = 39.9$; $\rho = 1000$ kg/m³

Phantom section: Right Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(5.29, 5.29, 5.29); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

Right Head Tilt/Area Scan (61x81x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (interpolated) = 0.027 mW/g

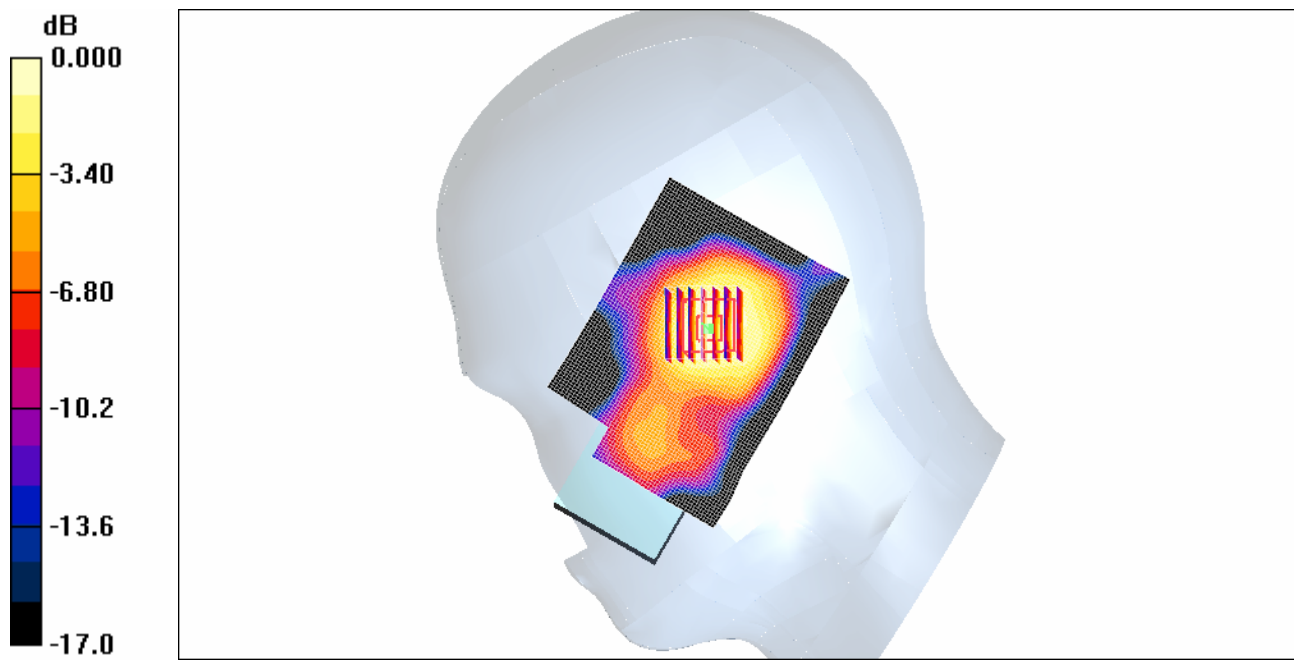
Right Head Tilt/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 3.94 V/m; Power Drift = -0.084 dB

Peak SAR (extrapolated) = 0.037 W/kg

SAR(1 g) = 0.024 mW/g; SAR(10 g) = 0.014 mW/g

Maximum value of SAR (measured) = 0.026 mW/g



0 dB = 0.026mW/g

Plot#3

Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**Right Head Tilt (Middle Channel)****American Telecom Services; DUT Type: X10002X**

Communication System: DECT; Frequency: 1924.992 MHz; Duty Cycle: 1:12
 Medium parameters used: $f = 1910$ MHz; $\sigma = 1.39$ mho/m; $\epsilon_r = 39.9$; $\rho = 1000$ kg/m³
 Phantom section: Right Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(5.29, 5.29, 5.29); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

Right Head Tilt/Area Scan (61x81x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (interpolated) = 0.021 mW/g

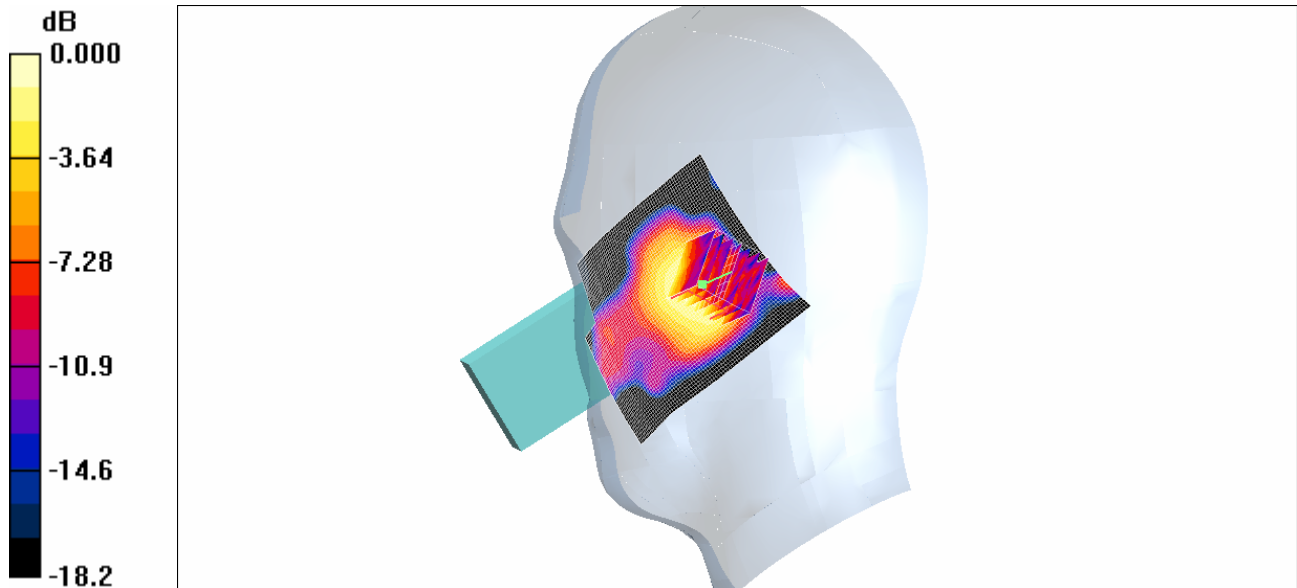
Right Head Tilt/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 3.90 V/m; Power Drift = -0.043 dB

Peak SAR (extrapolated) = 0.035 W/kg

SAR(1 g) = 0.019 mW/g; SAR(10 g) = 0.011 mW/g

Maximum value of SAR (measured) = 0.021 mW/g



0 dB = 0.021mW/g

Plot#4

Test Laboratory: Bay Area Compliance Lab Corp.(BACL)**1.5 cm separation to flat phantom (Middle Channel)****American Telecom Services, Inc.; DUT Type: X10002X**

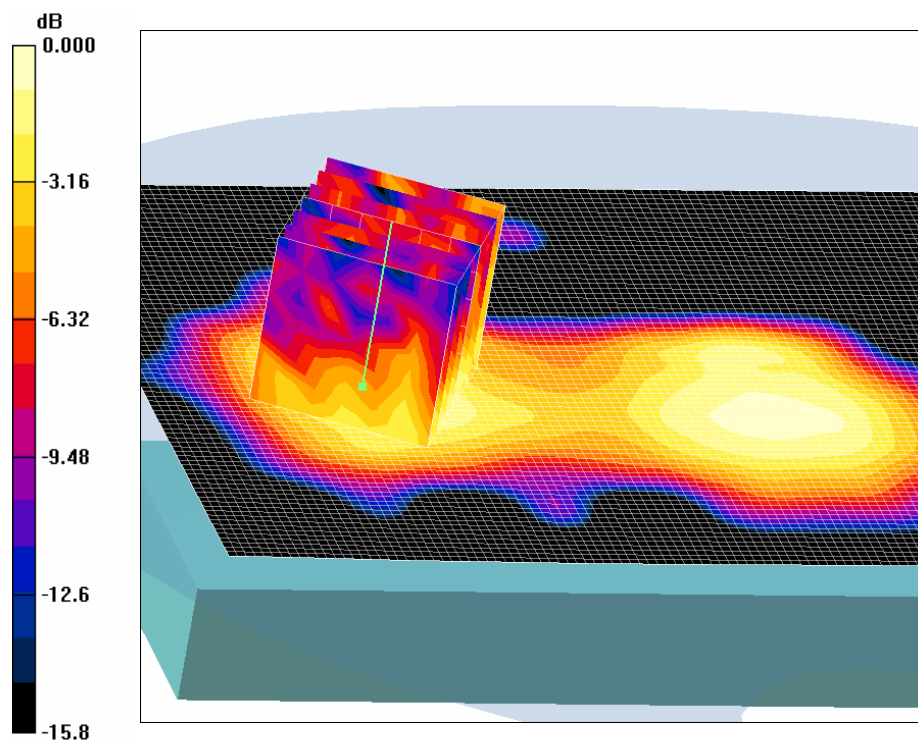
Communication System: DECT; Frequency: 1924.992 MHz; Duty Cycle: 1:12
 Medium parameters used: $f = 1910$ MHz; $\sigma = 1.52$ mho/m; $\epsilon_r = 51.3$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

DASY4 Configuration:

- Probe: ET3DV6 - SN1604; ConvF(4.88, 4.88, 4.88); Calibrated: 5/2/2006
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn456; Calibrated: 10/18/2005
- Phantom: SAM with CRP; Type: Twin SAM; Serial: TP-1032
- Measurement SW: DASY4, V4.6 Build 23; Post processing SW: SEMCAD, V1.8 Build 161

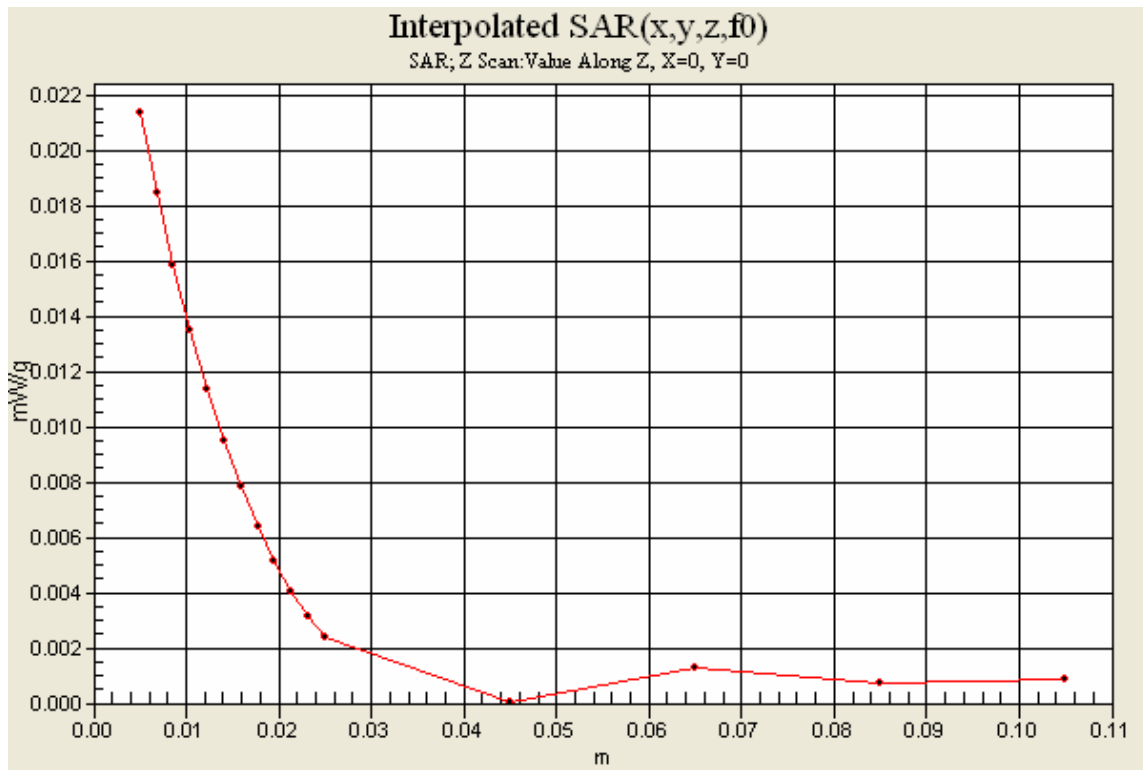
1.5 cm separation to flat phantom /Area Scan (81x121x1): Measurement grid: dx=15mm, dy=15mm
 Maximum value of SAR (interpolated) = 0.012 mW/g

1.5 cm separation to flat phantom /Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
 Reference Value = 2.83 V/m; Power Drift = 0.053 dB
 Peak SAR (extrapolated) = 0.031 W/kg
SAR(1 g) = 0.011 mW/g; SAR(10 g) = 0.00605 mW/g
 Maximum value of SAR (measured) = 0.012 mW/g



0 dB = 0.012mW/g

Plot#5



Z-Axis

APPENDIX F – 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 spectrum analyzer through sufficient attenuation.

Test equipment

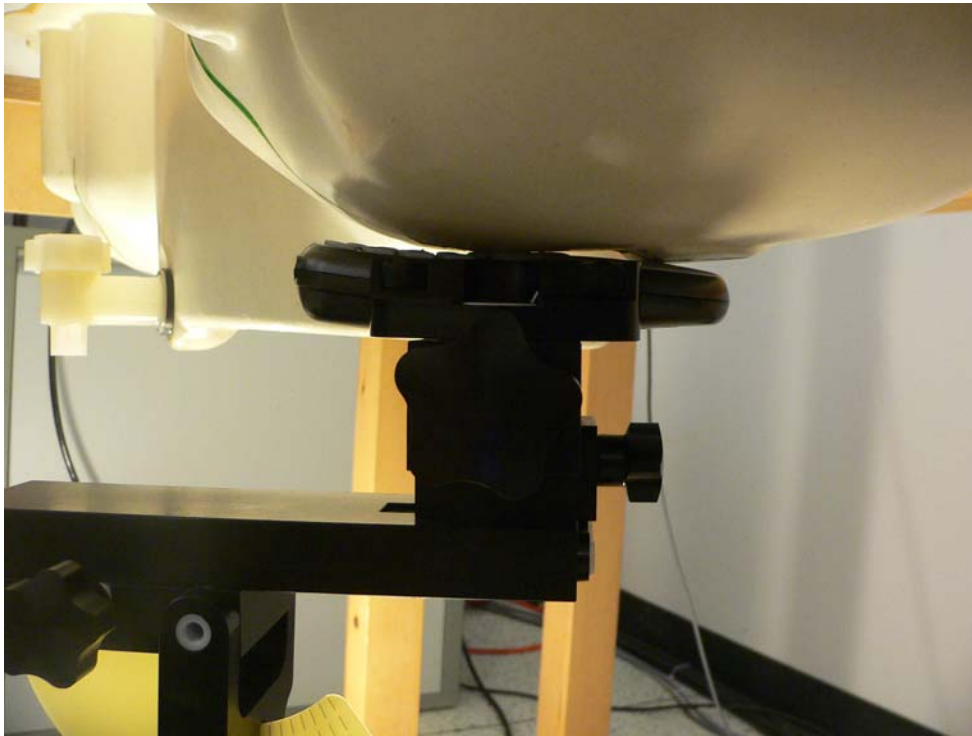
Agilent PSA E4446A Spectrum Analyzer, Calibration Due Date: 2007-03-06.

Test Results

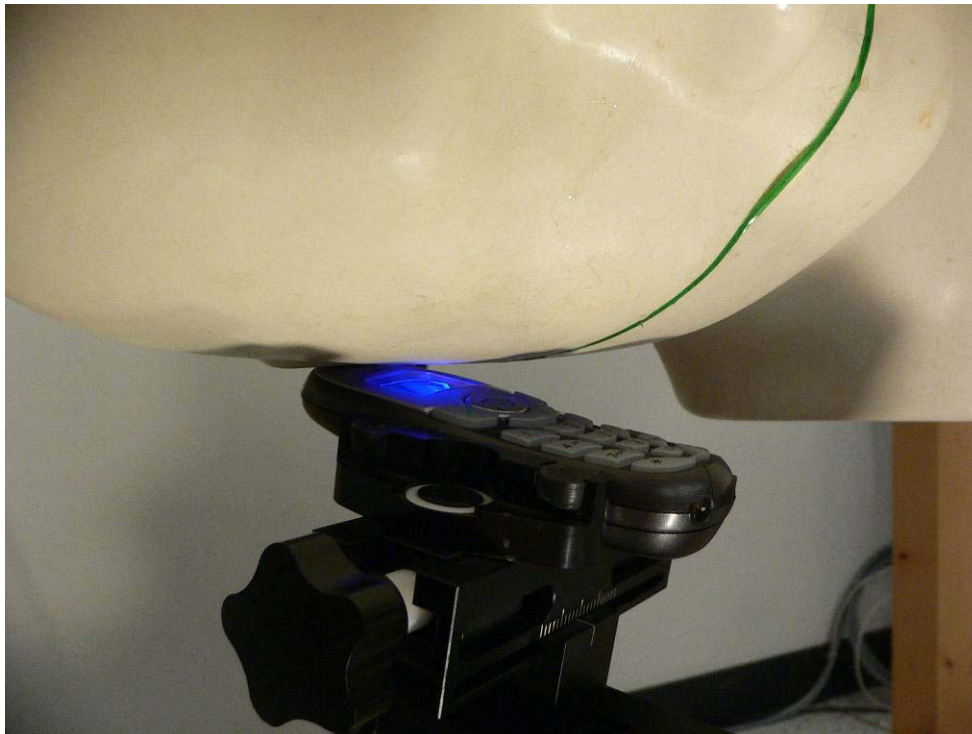
Frequency (MHz)	Output Power in dBm	Output Power in mw
1924.992	18.56	71.8

APPENDIX G – EUT TEST POSITION PHOTOS

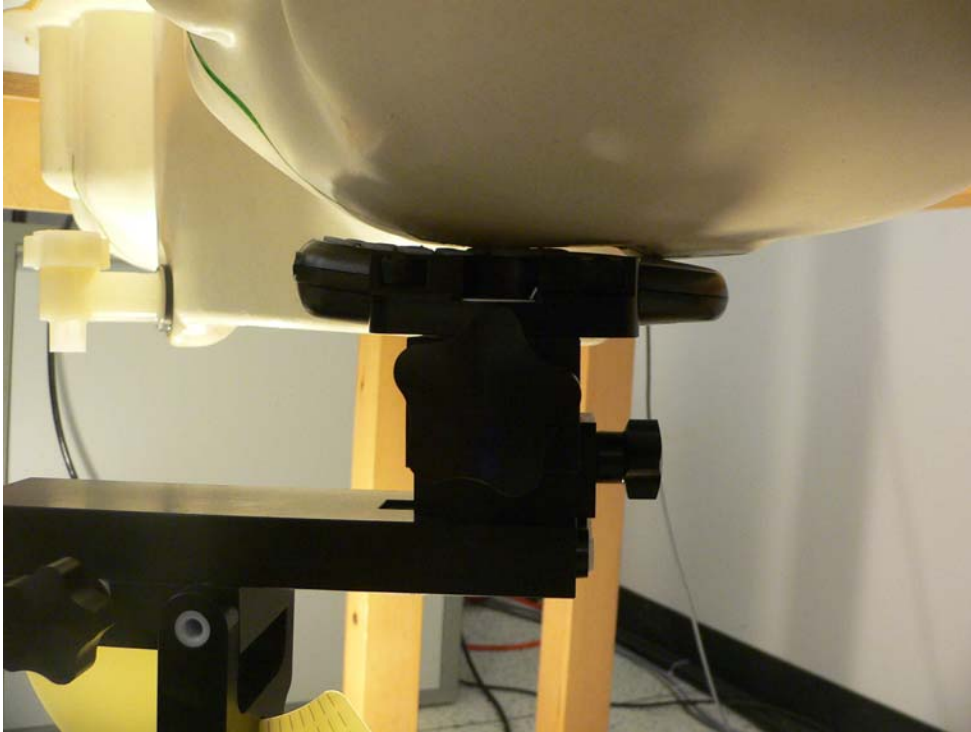
Left head touch setup photo



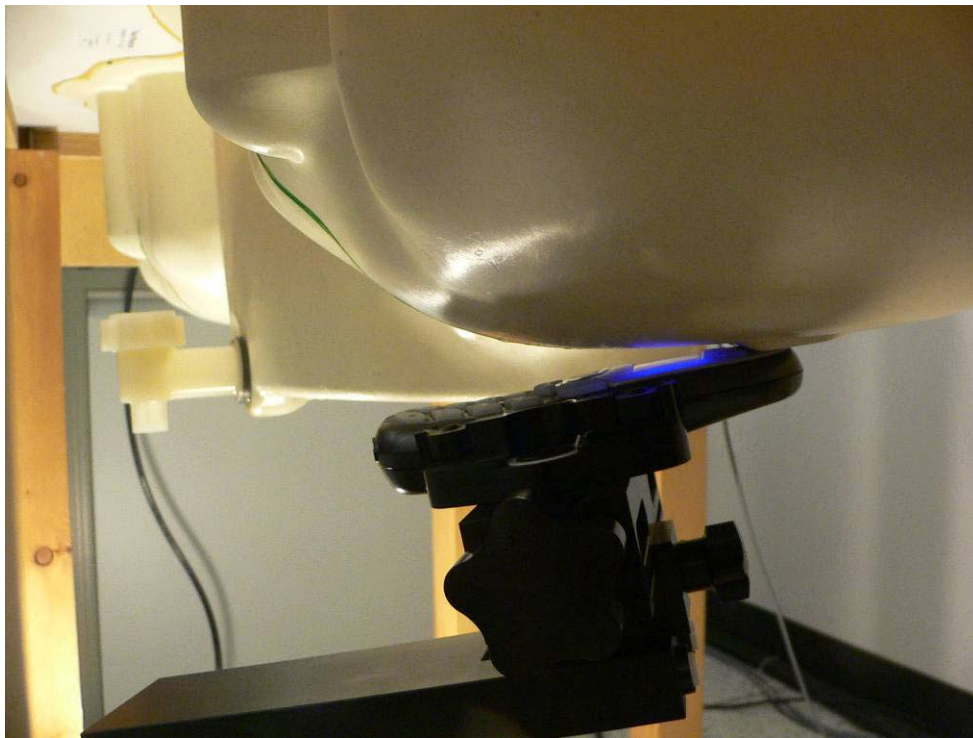
Left head tilt setup photo



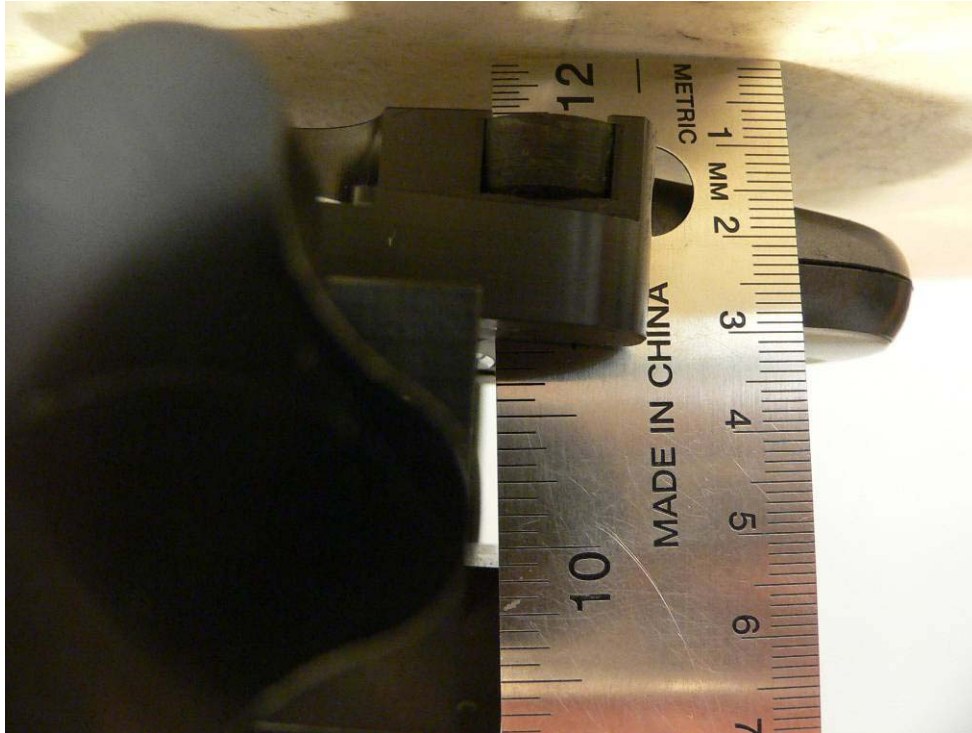
Right head touch setup photo



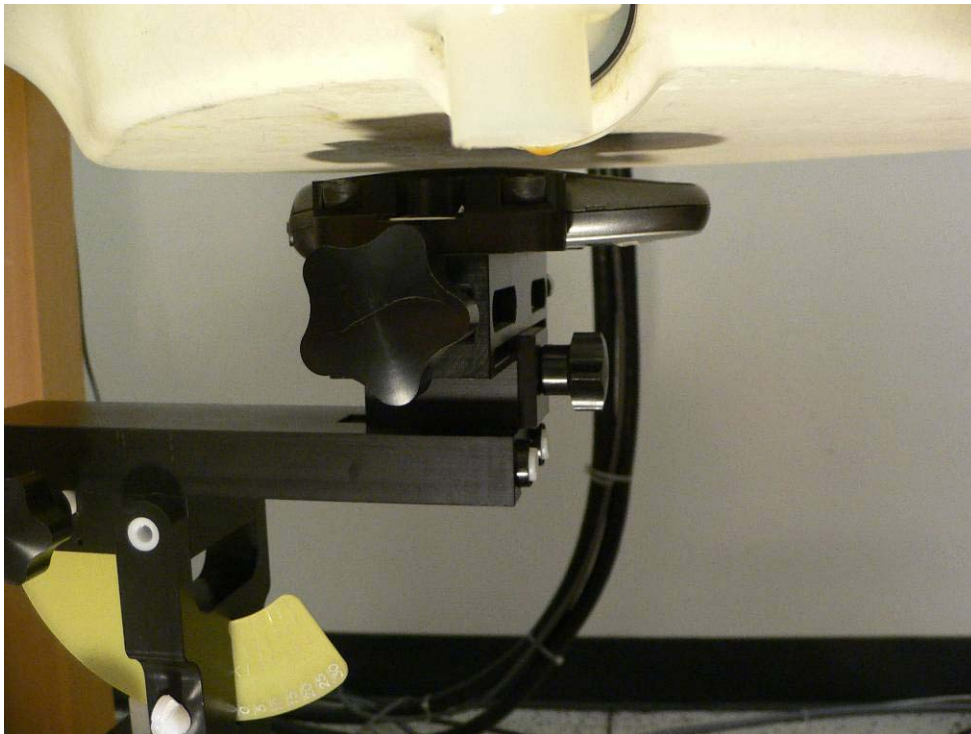
Right head tilt setup photo



1.5 cm body worm setup photo with headset (I)



1.5 cm body worm setup photo with headset (II)



APPENDIX H – EUT & ACCESSORIES PHOTOS

EUT - Top View



EUT - Bottom View



APPENDIX I - INFORMATIVE REFERENCES

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