FCC OET BULLETIN 65 SUPPLEMENT C

SAR EVALUATION REPORT
(WLAN PORTION)

For

eBook, WLAN, Bluetooth, and USB Ports without WWAN

MODEL: PLR001

FCC ID: WXP-PLR001

REPORT NUMBER: 09U12889-8

ISSUE DATE: January 4, 2010

Prepared for

PLASTIC LOGIC
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Prepared by

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NVLAP LAB CODE 200065-0

Revision History

Rev.	Issue Date	Revisions	Revised By
--	December 4, 2010	Initial Issue	--

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1. ATTESTATION OF TEST RESULTS

COMPANY NAME:	PLASTIC LOGIC 650 CASTRO STREET SUITE 500, MOUNTAIN VIEW, CA 94041, U.S.A
EUT DESCRIPTION:	eBook, WLAN, Bluetooth, and USB Ports without WWAN
MODEL NUMBER:	PLR001
DEVICE CATEGORY:	Portable
EXPOSURE CATEGORY:	General Population/Uncontrolled Exposure
DATE TESTED:	December 31, 2009

THE HIGHEST SAR VALUES:

FCC/IC Rule Parts	Freq. Range [MHz]	The Highest SAR Values (1g_mW/g)	Limit (mW/g)
15.247 / RSS-102	2400 – 2483.5	0.751	1.6

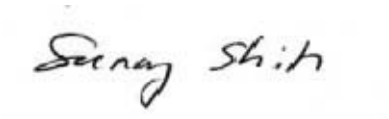
APPLICABLE STANDARDS:

STANDARD	TEST RESULTS
FCC OET BULLETIN 65 SUPPLEMENT C and the following Test Procedures: o KDB 248227 SAR measurement procedures for 802.11a/b/g transmitters o KDB 447498 D01 Mobile Portable RF Exposure v04, supplemental to KDB 616217 D03	Pass
RSS-102 ISSUE 3	Pass

Compliance Certification Services, Inc. (CCS) tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by CCS based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

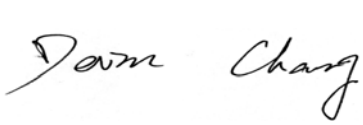
Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by CCS and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by CCS will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government.

Approved & Released For CCS By:



SUNNY SHIH
ENGINEERING SUPERVISOR
COMPLIANCE CERTIFICATION SERVICES

Tested By:



DEVIN CHANG
EMC ENGINEER
COMPLIANCE CERTIFICATION SERVICES

2. TEST METHODOLOGY

The tests documented in this report were performed in accordance with FCC OET Bulletin 65 Supplement C, Specific FCC Procedure KDB 248227 SAR Measurement Procedure for 802.11abg Transmitters, KDB 447498 D01 Mobile Portable RF Exposure v04, supplemental to KDB 616217 D03 and IC RSS 102 Issue 3.

3. FACILITIES AND ACCREDITATION

The test sites and measurement facilities used to collect data are located at 47173 Benicia Street, Fremont, California, USA.

CCS is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at http://www.ccsemc.com.

4. CALIBRATION AND UNCERTAINTY

4.1. MEASURING INSTRUMENT CALIBRATION

The measuring equipment utilized to perform the tests documented in this report has been calibrated in accordance with the manufacturer's recommendations, and is traceable to recognized national standards.

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due date		
				MM	DD	Year
Robot - Six Axes	St酮bli	RX90BL	N/A	N/A		
Robot Remote Control	St酮bli	CS7MB	3403-91535	N/A		
DASY4 Measurement Server	SPEAG	SEUMS001BA	1041	N/A		
Probe Alignment Unit	SPEAG	LB (V2)	261	N/A		
SAM Phantom (SAM1)	SPEAG	QD000P40CA	1185	N/A		
SAM Phantom (SAM2)	SPEAG	QD000P40CA	1050	N/A		
Oval Flat Phantom (ELI 4.0)	SPEAG	QD OVA001 B	1003	N/A		
Electronic Probe kit	HP	85070C	N/A	N/A		
S-Parameter Network Analyzer	Agilent	8753ES-6	MY40001647	11	22	2010
Signal Generator	Agilent	8753ES-6	MY40001647	11	22	2010
E-Field Probe	SPEAG	EX3DV4	3686	3	23	1010
Data Acquisition Electronics	SPEAG	DAE3 V1	500	9	15	2010
System Validation Dipole	SPEAG	D900V2	108	1	21	2010
System Validation Dipole	SPEAG	D1800V2	294	1	29	2010
System Validation Dipole	SPEAG	D1900V2	5d043	1	29	2010
System Validation Dipole	SPEAG	D2450V2	748	4	14	2010
System Validation Dipole	SPEAG	D5GHzV2	1075	10	3	2012
ESG Vector Signal Generator	Agilent	E4438C	US44271090	9	17	2010
Power Meter	Giga-tronics	8651A	8651404	1	11	2010
Power Sensor	Giga-tronics	80701A	1834588	1	11	2010
Amplifier	Mini-Circuits	ZVE-8G	90606	N/A		
Amplifier	Mini-Circuits	ZHL-42W	D072701-5	N/A		
Simulating Liquid	SPAEG	H2450	N/A	Within 24 hrs of first test		
Simulating Liquid	SPAEG	M2450	N/A	Within 24 hrs of first test		
Simulating Liquid	SPAEG	M5800	N/A	Within 24 hrs of first test		

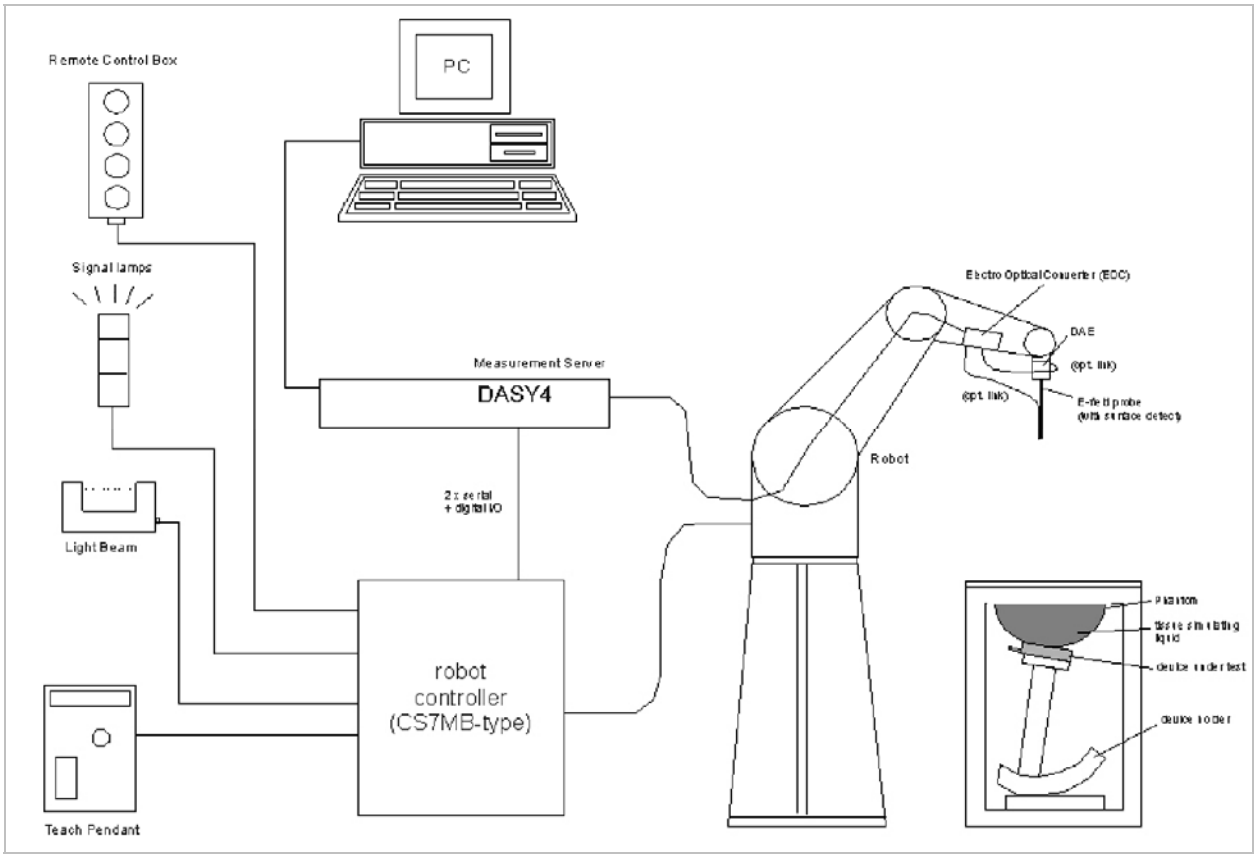
4.2. MEASUREMENT UNCERTAINTY

Measurement uncertainty for 300 MHz – 3000 MHz

Uncertainty component	Tol. (?)	Probe Dist.	Div.	Ci (1g)	Ci (10g)	Std. Unc.(?)	
						Ui (1g)	Ui(10g)
Measurement System							
Probe Calibration	4.80	N	1	1	1	4.80	4.80
Axial Isotropy	4.70	R	1.732	0.707	0.707	1.92	1.92
Hemispherical Isotropy	9.60	R	1.732	0.707	0.707	3.92	3.92
Boundary Effects	1.00	R	1.732	1	1	0.58	0.58
Linearity	4.70	R	1.732	1	1	2.71	2.71
System Detection Limits	1.00	R	1.732	1	1	0.58	0.58
Readout Electronics	1.00	N	1	1	1	1.00	1.00
Response Time	0.80	R	1.732	1	1	0.46	0.46
Integration Time	2.60	R	1.732	1	1	1.50	1.50
RF Ambient Conditions - Noise	1.59	R	1.732	1	1	0.92	0.92
RF Ambient Conditions - Reflections	0.00	R	1.732	1	1	0.00	0.00
Probe Positioner Mechnical Tolerance	0.40	R	1.732	1	1	0.23	0.23
Probe Positioning With Respect to Phantom Shell	2.90	R	1.732	1	1	1.67	1.67
Extrapolation, interpolation, and integration algorithms for max. SAR evaluation	3.90	R	1.732	1	1	2.25	2.25
Test sample Related							
Test Sample Positioning	1.10	N	1	1	1	1.10	1.10
Device Holder Uncertainty	3.60	N	1	1	1	3.60	3.60
Power and SAR Drift Measurement	5.00	R	1.732	1	1	2.89	2.89
Phantom and Tissue Parameters							
Phantom Uncertainty	4.00	R	1.732	1	1	2.31	2.31
Liquid Conductivity - Target	5.00	R	1.732	0.64	0.43	1.85	1.24
Liquid Conductivity - Meas.	8.60	N	1	0.64	0.43	5.50	3.70
Liquid Permittivity - Target	5.00	R	1.732	0.6	0.49	1.73	1.41
Liquid Permittivity - Meas.	3.30	N	1	0.6	0.49	1.98	1.62
Combined Standard Uncertainty	RSS					11.44	10.49
Expanded Uncertainty (95% Confidence Interval)	K=2					22.87	20.98

Notesfor table
1. Tol. - tolerance in influence quaitity
2. N - Nomal
3. R - Rectangular
4. Div. - Divisor used to obtain standard uncertainty
5. Ci - is te sensitivity coefficient

5. SYSTEM SPECIFICATIONS



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 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 controls 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.

6. COMPOSITION OF INGREDIENTS FOR TISSUE SIMULATING LIQUIDS

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.

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

Salt: 99+% Pure Sodium Chloride Sugar: 98+% Pure Sucrose
Water: De-ionized, 16 MΩ+ resistivity HEC: Hydroxyethyl 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

7. LIQUID PARAMETERS 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 ± 5% of the values given in the table below.

Reference Values of Tissue Dielectric Parameters for Head and Body Phantom (for 150 – 3000 MHz and 5800 MHz)

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in IEEE Standard 1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations and extrapolated according to the head parameters specified in IEEE Standard 1528.

Target Frequency (MHz)	Head		Body	
	ε_r	σ (S/m)	ε_r	σ (S/m)
150	52.3	0.76	61.9	0.8
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.9	55.2	0.97
900	41.5	0.97	55	1.05
915	41.5	0.98	55	1.06
1450	40.5	1.2	54	1.3
1610	40.3	1.29	53.8	1.4
1800 – 2000	40	1.4	53.3	1.52
2450	39.2	1.8	52.7	1.95
3000	38.5	2.4	52	2.73
5800	35.3	5.27	48.2	6

(ε_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m^3)

7.1. LIQUID CHECK RESULTS FOR 2450 MHZ

Simulating Liquid Dielectric Parameters for Muscle 2450 MHz

Room Ambient Temperature = 24°C; Relative humidity = 40% Measured by: Devin Chang

f (MHz)	Liquid Parameters			Measured	Target	Delta (%)	Limit (%)
2450	e'	53.49	Relative Permittivity (ϵ_r):	53.491	52.7	1.50	± 5
	e"	14.04	Conductivity (σ):	1.914	1.95	-1.85	± 5

Liquid Check
Ambient temperature: 24 deg. C; Liquid temperature: 23 deg. C
December 31, 2009 02:39 PM

Frequency	e'	e"
2400000000.	54.7888	14.4131
2405000000.	54.8128	14.3804
2410000000.	54.7776	14.3395
2415000000.	54.7032	14.2756
2420000000.	54.5895	14.1977
2425000000.	54.4318	14.1285
2430000000.	54.2454	14.0557
2435000000.	54.0377	14.0134
2440000000.	53.8493	14.0053
2445000000.	53.6740	14.0121
2450000000.	**53.4911**	**14.0418**
2455000000.	53.3297	14.0782
2460000000.	53.2213	14.1302
2465000000.	53.1554	14.1961
2470000000.	53.1570	14.2654
2475000000.	53.1882	14.3736
2480000000.	53.2978	14.4666
2485000000.	53.4471	14.5733
2490000000.	53.6116	14.6955
2495000000.	53.7842	14.7991
2500000000.	53.9594	14.9115

The conductivity (σ) can be given as:

$$\sigma = \omega \varepsilon_0 e'' = 2 \pi f \varepsilon_0 e''$$

where f = target f * 10^6

$\varepsilon_0 = 8.854 * 10^{-12}$

8. SYSTEM PERFORMANCE

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 of ±10%.

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 DASY4 system with an Isotropic E-Field Probe EX3DV4-SN: 3686 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 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
  For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (2.4 GHz) fine cube was chosen for cube integration and Special 8x8x10 (5 GHz) fine cube was chosen for cube integration
- Distance between probe sensors and phantom surface was set to 3mm.
  For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5mm
- The dipole input power (forward power) were 100 mW (5GHz) and 250 mW (2.4GHz) ±3%
- The results are normalized to 1 W input power.

Reference SAR Values for HEAD & BODY-tissue from calibration certificate of SPEAG.
Certificate no: D2450V2-748_April 14, 2008

f (MHz)	Head Tissue		Body Tissue	
	SAR_{1g}	SAR_{10g}	SAR_{1g}	SAR_{10g}
2450			49.5	23.3

8.1. SYSTEM CHECK RESULTS FOR D2450V2

System Validation Dipole: D2450V2 SN: 748

Date: December 31, 2009

Ambient Temperature = 24°C; Relative humidity = 40% Measured by: Devin Chang

Medium	CW Signal (MHz)	Forward power (mW)	Measured (Normalized to 1 W)		Target	Delta (%)	Tolerance (%)
Body	2450	100	1g SAR:	51.3	49.5	3.64	±10
			10g SAR:	23.6	23.3	1.29	

9. OUTPUT POWER VERIFICATION

TEST PROCEDURE

The transmitter output is connected to a power meter.

RESULTS

The cable assembly insertion loss of 11dB (including 10 dB pad and 1 dB cable) was entered as an offset in the power meter to allow for direct reading of power.

Channel	Frequency (MHz)	Power (dBm)
1	2412	16.50
6	2437	16.60
11	2462	16.20

10. EQUIPMENT UNDER TEST

10.1" eBook , WLAN, Bluetooth, and USB Ports without WWAN	
Normal operation:	Tablet - Edge (underarm) & lap-held
Antenna tested:	Manufactured: Aristotle; Part / model number: 710-00024B
Antenna-to-user separation distance:	Refer to Section 11 for antenna-to-user separation distance
Antenna-to-antenna distance:	Refer to antenna specifications
Require SAR evaluation for Simultaneous transmission?	WWAN co-located RF exposure assessment will be addressed in a separate FCC application filed under WWAN application.
Power supply:	Power supplied through laptop computer (host device)

11. SUMMARY OF TEST RESULTS

1) Tablet - Lap-held (0.4 cm from Tx antennas-to-user)

Mode	Channel	f (MHz)	Antenna	Results (mW/g)	
				1g-SAR	10g-SAR
802.11b	6	2437	Main	0.751	0.339

2) Tablet - Primary Portrait

SAR is not required due to separation distance form Tx Antenna-to-user is more than 20 cm.

3) Tablet– Secondary Portrait (0.5 cm from Tx antennas-to-user)

Mode	Channel	f (MHz)	Antenna	Results (mW/g)	
				1g-SAR	10g-SAR
802.11b	6	2437	Main	0.134	0.034

4) Tablet - Primary Landscape

Skip SAR due to separation distance form Tx Antenna-to-user is more than 19 cm.

5) Tablet - Secondary Landscape (0.4 cm from Tx antennas-to-user)

Mode	Channel	f (MHz)	Antenna	Results (mW/g)	
				1g-SAR	10g-SAR
802.11b	6	2437	Main	0.483	0.186

12. SAR TEST PLOTS

WORST-CASE SAR PLOT

Date/Time: 12/31/2009 5:28:19 PM

Test Laboratory: Compliance Certification Services

Lap-held

DUT: Plastic Logic; Type: NA; Serial: NA

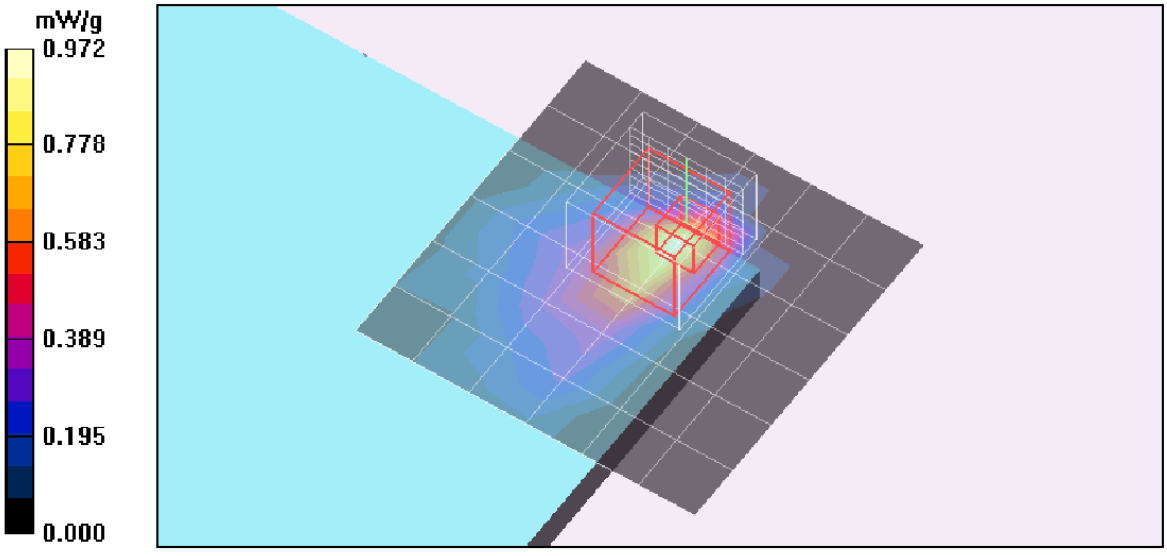
Communication System: 802.11bg; Frequency: 2437 MHz;Duty Cycle: 1:1
Medium parameters used (interpolated): f = 2437 MHz; σ = 1.9 mho/m; ε_r = 54; ρ = 1000 kg/m^3
Phantom section: Flat Section

Room Ambient Temperature: 24.0 deg. C; Liquid Temperature: 23.0 deg. C

DASY4 Configuration:
- Area Scan setting - Find Secondary Maximum Within: 2.0 dB and with a peak SAR value greater than 0.0012W/kg
- Probe: EX3DV4 - SN3686; ConvF(6.48, 6.48, 6.48); Calibrated: 3/23/2009
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn500; Calibrated: 9/15/2009
- Phantom: Flat Phantom ELI4.0; Type: QDOVA001BA; Serial: SN:1003
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

802.11b M-ch 2/Area Scan (7x7x1): Measurement grid: dx=15mm, dy=15mm
Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.972 mW/g

802.11b M-ch 2/Zoom Scan (7x7x9)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=3mm
Reference Value = 4.94 V/m; Power Drift = 2.41 dB
Peak SAR (extrapolated) = 1.96 W/kg
SAR(1 g) = 0.751 mW/g; SAR(10 g) = 0.339 mW/g
Info: Interpolated medium parameters used for SAR evaluation.
Maximum value of SAR (measured) = 0.986 mW/g



13. ATTACHMENTS

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