



**FCC SAR EVALUATION REPORT**

**In accordance with the requirements of**

**FCC Report and Order: ET Docket 93-62, and OET Bulletin 65 Supplement C  
ANSI/IEEE Std. C95.1-1992**

For

**Ultra Low Power 802.11b/g/n Module**

**MODEL: RS9110-N-11-02**

**Trade Name: LiteFi**

*Prepared for*

**Redpine Signals Inc**

**2107 N.first Street,Suite 680,San Jose,CA95131-2019**

*Prepared by*

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1. EUT DESCRIPTION

|                              |  |
|------------------------------|--|
| <b>Applicant:</b>            | Redpine Signals Inc                                    |
|                              | 2107 N.first Street, Suite 680, San Jose, CA95131-2019 |
| <b>Equipment Under Test:</b> | Ultra Low Power 802.11b/g/n Module                     |
| <b>Trade Name:</b>           | LiteFi   |
| <b>Model Number:</b>         | RS9110-N-11-02   |
| <b>Device Category:</b>      | PORTABLE DEVICES                                       |
| <b>Exposure Category:</b>    | GENERAL POPULATION/UNCONTROLLED EXPOSURE               |
| <b>Report Number:</b>        | SZ090401B04  |
| <b>Date of Test:</b>         | July 24, 2009  |

**Test Sample is a:** Production unit

**Modulation Type:** DSSS/OFDM

**Operating Mode:** Maximum continuous output

**Frequency Range:** 2412MHz~2462MHz

**Max. O/P Power:** 12.36dBm (2437MHz B Mode)  
 (Conducted) 10.51dBm (2462MHz G Mode)  
 10.62dBm (2462MHz HT20n Mode)

**Max. SAR (1g):** 0.679W/kg (2412MHz B Mode)  
 0.664W/kg(2412MHz G Mode)  
 0.706 W/kg(2412MHz HT20n Mode)



**Application Type:** Certification

| APPLICABLE STANDARDS               |                         |
|------------------------------------|-------------------------|
| STANDARD                           | TEST RESULT             |
| FCC OET 65 Supplement C            | No non-compliance noted |
| Deviation from Applicable Standard |                         |
| None                               |                         |

The above wireless portable device was tested by Compliance Certification Services Inc. in accordance with the measurement methods and procedures specified in OET Bulletin 65 Supplement C (Edition 01-01). The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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**2. REQUIREMENTS FOR COMPLIANCE TESTING DEFINED BY THE FCC**

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996. The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g for an uncontrolled environment and 8.0 mW/g for an occupational/controlled environment as recommended by the ANSI/IEEE standard C95.1-1992. 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.

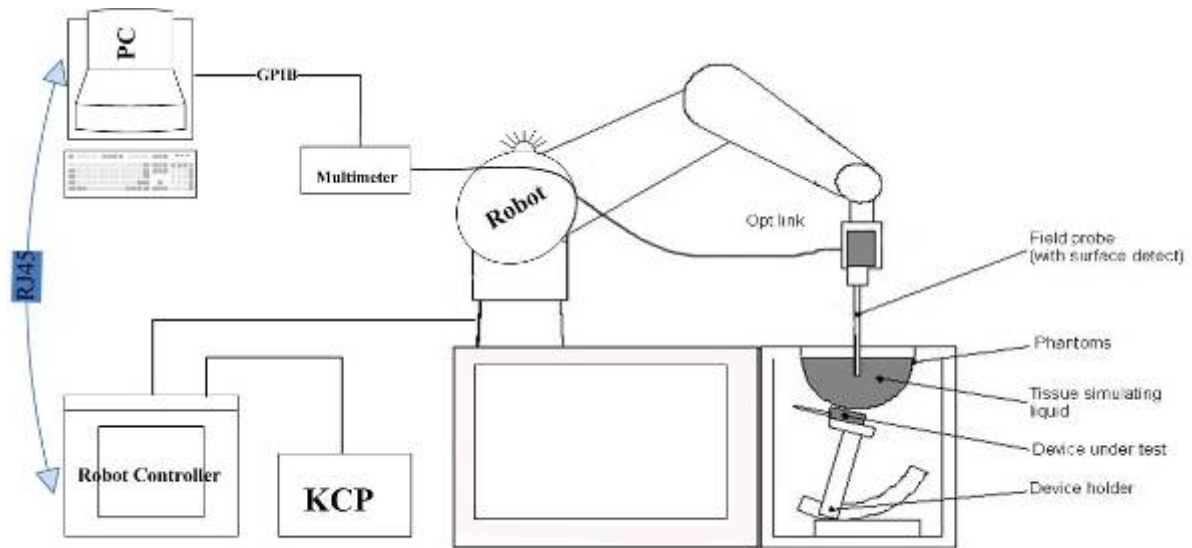
**3. DOSIMETRIC ASSESSMENT SYSTEM**

These measurements were performed with the automated near-field scanning system OPENSAR from ANTENNESSA. The system is based on a high precision robot (working range greater than 0.9 m), which positions the probes with a positional repeatability of better than ± 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The SAR measurements were conducted with the dosimetric probe EP74 SN0807 (manufactured by ANTENNESSA), designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure described in [7] with accuracy of better than ±10%. The spherical isotropy was evaluated with the procedure described in [8] and found to be better than ±0.25 dB. The phantom used was the SAM Phantom as described in FCC supplement C, IEE P1528 and CENELEC EN50361.

The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

| Ingredients<br>(% 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 |

### 3.1 MEASUREMENT SYSTEM DIAGRAM



**The OPENSAR system for performing compliance tests consist of the following items:**

1. A standard high precision 6-axis robot (KUKA) with controller and software.
2. KUKA Control Panel (KCP).
3. 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.
4. The functions of the PC plug-in card are to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
5. A computer operating Windows 95.
6. OPENSAR software.
7. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
8. The SAM phantom enabling testing left-hand right-hand and body usage.
9. The Position device for handheld EUT.
10. Tissue simulating liquid mixed according to the given recipes (see Application Note).
11. System validation dipoles to validate the proper functioning of the system.

### 3.2 SYSTEM COMPONENTS

#### SN11/09 EP100 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 100 MHz to 2.5 GHz

In brain and muscle simulating tissue at frequencies of 835 MHz, 897MHz ,1747 MHz,1880 MHz,1950 MHz and 1.8 GHz (accuracy of  $\pm 8\%$ )

Frequency 100 MHz to  $> 30\text{GHz}$ ; Linearity:  $\pm 0.25$  dB (100 MHz to 30 GHz)

Directivity  $\pm 0.25$  dB in brain tissue (rotation around probe axis)

$\pm 0.5$  dB in brain tissue (rotation normal probe axis)

Dynamic 5 mW/g to  $> 100$  mW/g;

Range Linearity:  $\pm 0.25$  dB

Surface  $\pm 0.2$  mm repeatability in air and clear liquids

Detection over diffuse reflecting surfaces

Dimensions Overall length: 330 mm

Tip length: 16 mm

Body diameter: 8 mm

Tip diameter: 6.5 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 SN11/09 EP100 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 KRC 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 OPENSAR 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.



**Photograph of the Probe**



**Inside View of SN11/09 EP100 E-field**

### 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.

### SAM Phantom

The SAM Phantom SAM29 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN50361. The phantom enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

Shell Thickness:  $2 \pm 0.2$  mm

Filling Volume: Approx. 25 liters

Dimensions (H x L x W): 810 x 1000 x 500 mm

### Device Holder for Transmitters

In combination with the Generic Twin Phantom V3.0, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

*Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations [10]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.*



SAM Phantom



## 4. EVALUATION PROCEDURE

### 4.1 DATA EVALUATION

The OPENSAR software automatically executes the following procedure 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             | Norm <sub>i</sub> , a <sub>i10</sub> , a <sub>i11</sub> , a <sub>i12</sub> |
|                    | - 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 either be found in the component documents or be imported into the software from the configuration files issued for the OPENSAR components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the 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:

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

Where  $V_i$  = 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 (ANTENNESSA parameter)

$dcp_i$  = Diode compression point (ANTENNESSA parameter)

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

$$E\text{-field probes: } E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

$$H\text{-field probes: } H_i = \sqrt{V_i} \cdot \frac{a_{i10} + a_{i11}f + a_{i12}f^2}{f}$$

Where  $V_i$  = Compensated signal of channel  $i$  ( $i = x, y, z$ )

$Norm_i$  = Sensor sensitivity of channel  $i$  ( $i = x, y, z$ )  
 $\mu V / (V/m)^2$  for E0field Probes

$ConvF$  = Sensitivity enhancement in solution

$a_{ij}$  = Sensor sensitivity factors for H-field probes





$f$  = Carrier frequency (GHz)

$E_i$  = Electric field strength of channel  $i$  in V/m

$H_i$  = Magnetic field strength of channel  $i$  in A/m

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.

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

where  $SAR$  = local specific absorption rate in mW/g

$E_{tot}$  = total field strength in V/m

$\sigma$  = conductivity in [mho/m] or [siemens/m]

$\rho$  = equivalent tissue density in g/cm<sup>3</sup>

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

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

$$P_{pwe} = \frac{E_{tot}^2}{3770} \quad \text{or} \quad P_{pwe} = H_{tot}^2 \cdot 37.7$$

where  $P_{pwe}$  = Equivalent power density of a plane wave in mW/cm<sup>2</sup>

$E_{tot}$  = total electric field strength in V/m

$H_{tot}$  = total magnetic field strength in A/m



## 4.2 SAR EVALUATION PROCEDURES

The procedure for assessing the peak spatial-average SAR value consists of the following steps:

- **Power Reference Measurement**

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

- **Area Scan**

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a finer measurement around the hot spot. The sophisticated interpolation routines implemented in OPENSAR software can find the maximum locations even in relatively coarse grids. The scan area is defined by an editable grid. This grid is anchored at the grid reference point of the selected section in the phantom. When the area scan's property sheet is brought-up, grid was at to 15 mm by 15 mm and can be edited by a user.

- **Zoom Scan**

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default zoom scan measures 5 x 5 x 7 points within a cube whose base faces are centered around the maximum found in a preceding area scan job within the same procedure. If the preceding Area Scan job indicates more than one maximum, the number of Zoom Scans has to be enlarged accordingly (The default number inserted is 1).

- **Power Drift measurement**

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

### 4.3 SPATIAL PEAK SAR EVALUATION

The procedure for spatial peak SAR evaluation has been implemented according to the IEEE1529 standard. It can be conducted for 1 g and 10 g.

The OPENSAR system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- boundary correction
- peak search for averaged SAR

During a maximum search, global and local maximum searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard's method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

#### Extrapolation

*Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation.*

*Extrapolation routines require at least 10 measurement points in 3-D space. They are used in the Cube Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard's method for extrapolation. For a grid using 5x5x7 measurement points with 5mm resolution amounting to 343 measurement points, the uncertainty of the extrapolation routines is less than 1% for 1 g and 10 g cubes.*

#### Boundary effect

*For measurements in the immediate vicinity of a phantom surface, the field coupling effects between the probe and the boundary influence the probe characteristics. Boundary effect errors of different dosimetric probe types have been analyzed by measurements and using a numerical probe model. As expected, both methods showed an enhanced sensitivity in the immediate vicinity of the boundary. The effect strongly depends on the probe dimensions and disappears with increasing distance from the boundary. The sensitivity can be approximately given as:*

$$S \approx S_o + S_b \exp\left(-\frac{z}{a}\right) \cos\left(\pi \frac{z}{\lambda}\right)$$

Since the decay of the boundary effect dominates for small probes ( $a \ll \lambda$ ), the cos-term can be omitted. Factors  $S_b$  (parameter Alpha in the OPENSAR software) and  $a$  (parameter Delta in the OPENSAR software) are assessed during probe calibration and used for numerical compensation of the boundary effect. Several simulations and measurements have confirmed that the compensation is valid for different field and boundary configurations.

*This simple compensation procedure can largely reduce the probe uncertainty near boundaries. It works well as long as:*

- the boundary curvature is small
- the probe axis is angled less than 30° to the boundary normal
- the distance between probe and boundary is larger than 25% of the probe diameter
- the probe is symmetric (all sensors have the same offset from the probe tip)

*Since all of these requirements are fulfilled in a OPENSAR system, the correction of the probe boundary effect in the vicinity of the phantom surface is performed in a fully automated manner via the measurement data extraction during postprocessing.*



5. MEASUREMENT UNCERTAINTY

**UNCERTAINTY EVALUATION FOR HANDSET SAR TEST**

| a   | b        | c             | d              | e=<br>f(d,k) | f                                  | g                                  | h=<br>cx/f/e                   | i=<br>cxg/e                     | k              |
|---|----------|---------------|----------------|--------------|------------------------------------|------------------------------------|--------------------------------|---------------------------------|----------------|
| Uncertainty Component   | Sec.     | Tol.<br>(± %) | Prob.<br>Dist. | Div.         | c <sub>i</sub><br>(1 g)            | c <sub>i</sub><br>(10 g)           | 1 g<br>u <sub>i</sub><br>(± %) | 10 g<br>u <sub>i</sub><br>(± %) | v <sub>i</sub> |
| <b>Measurement System</b>   |          |               |                |              |                                    |                                    |                                |                                 |                |
| Probe Calibration   | E.2.1.   | 7             | N              | 1            | 1                                  | 1                                  | 7                              | 7                               | ∞              |
| Axial Isotropy  | E.2.2.   | 2,5           | R              | √3           | (1-c <sub>p</sub> ) <sup>1/2</sup> | (1-c <sub>p</sub> ) <sup>1/2</sup> | 1,02062                        | 1,02062                         | ∞              |
| Hemispherical Isotropy  | E.2.2.   | 4             | R              | √3           | √C <sub>p</sub>                    | √C <sub>p</sub>                    | 1,63299                        | 1,63299                         | ∞              |
| Boundary Effect   | E.2.3.   | 1             | R              | √3           | 1                                  | 1                                  | 0,57735                        | 0,57735                         | ∞              |
| Linearity   | E.2.4.   | 5             | R              | √3           | 1                                  | 1                                  | 2,88675                        | 2,88675                         | ∞              |
| System Detection Limits   | E.2.5.   | 1             | R              | √3           | 1                                  | 1                                  | 0,57735                        | 0,57735                         | ∞              |
| Readout Electronics   | E.2.6.   | 0,02          | N              | 1            | 1                                  | 1                                  | 0,02                           | 0,02                            | ∞              |
| Response Time   | E.2.7.   | 3             | R              | √3           | 1                                  | 1                                  | 1,73205                        | 1,73205                         | ∞              |
| Integration Time  | E.2.8.   | 2             | R              | √3           | 1                                  | 1                                  | 1,1547                         | 1,1547                          | ∞              |
| RF Ambient Conditions   | E.6.1.   | 3             | R              | √3           | 1                                  | 1                                  | 1,73205                        | 1,73205                         | ∞              |
| Probe Positioner Mechanical Tolerance   | E.6.2.   | 2             | R              | √3           | 1                                  | 1                                  | 1,1547                         | 1,1547                          | ∞              |
| Probe Positioning with respect to Phantom Shell                                 | E.6.3.   | 0,05          | R              | √3           | 1                                  | 1                                  | 0,02887                        | 0,02887                         | ∞              |
| Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation | E.5.2.   | 5             | R              | √3           | 1                                  | 1                                  | 2,88675                        | 2,88675                         | ∞              |
| <b>Test sample Related</b>  |          |               |                |              |                                    |                                    |                                |                                 |                |
| Test Sample Positioning   | E.4.2.1. | 0,03          | N              | 1            | 1                                  | 1                                  | 0,03                           | 0,03                            | N-1            |
| Device Holder Uncertainty   | E.4.1.1. | 5             | N              | 1            | 1                                  | 1                                  | 5                              | 5                               | N-1            |
| Output Power Variation - SAR drift measurement                                  | 6.6.2.   | 3             | R              | √3           | 1                                  | 1                                  | 1,73205                        | 1,73205                         | ∞              |
| <b>Phantom and Tissue Parameters</b>  |          |               |                |              |                                    |                                    |                                |                                 |                |
| Phantom Uncertainty (shape and thickness tolerances)                            | E.3.1.   | 0,05          | R              | √3           | 1                                  | 1                                  | 0,02887                        | 0,02887                         | ∞              |
| Liquid Conductivity - deviation from target values                              | E.3.2.   | 5             | R              | √3           | 0,64                               | 0,43                               | 1,84752                        | 1,2413                          | ∞              |
| Liquid Conductivity - measurement uncertainty                                   | E.3.3.   | 5             | N              | 1            | 0,64                               | 0,43                               | 3,2                            | 2,15                            | M              |
| Liquid Permittivity - deviation from target values                              | E.3.2.   | 3             | R              | √3           | 0,6                                | 0,49                               | 1,03923                        | 0,8487                          | ∞              |
| Liquid Permittivity - measurement uncertainty                                   | E.3.3.   | 10            | N              | 1            | 0,6                                | 0,49                               | 6                              | 4,9                             | M              |
| <b>Combined Standard Uncertainty</b>  |          |               | RSS            |              |                                    |                                    | 11,1265                        | 10,5799                         |                |
| <b>Expanded Uncertainty (95% CONFIDENCE INTERVAL)</b>                           |          |               | k              |              |                                    |                                    | 21,8079                        | 20,7366                         |                |



6. EXPOSURE LIMIT

(A). Limits for Occupational/Controlled Exposure (W/kg)

| Whole-Body | Partial-Body | Hands, Wrists, Feet and Ankles |
|------------|--------------|--------------------------------|
| 0.4        | 8.0          | 20.0                           |

(B). Limits for General Population/Uncontrolled Exposure (W/kg)

| Whole-Body | Partial-Body | Hands, Wrists, Feet and Ankles |
|------------|--------------|--------------------------------|
| 0.08       | 1.6          | 4.0                            |

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

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

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

**NOTE**

**GENERAL POPULATION/UNCONTROLLED EXPOSURE**

**PARTIAL BODY LIMIT**

**1.6 W/kg**

## 7. EUT ARRANGEMENT

Please refer to IEEE P1528 illustration below.

The EUT was connected to base station simulator to meet the test parameter required by IEEE P1528.

### 7.1 ANTHROPOMORPHIC HEAD PHANTOM

Figure 7-1a shows the front, back and side views of SAM. The point “M” is the reference point for the center of mouth, “LE” is the left ear reference point (ERP), and “RE” is the right ERP. The ERPs are 15 mm posterior to the entrance to ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 7-1b. The plane passing through the two ear reference points and M is defined as the Reference Plane. The line N-F (Neck-Front) perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 7-1c). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines should be marked on the external phantom shell to facilitate handset positioning. Posterior to the N-F line, the thickness of the phantom shell with the shape of an ear is a flat surface 6 mm thick at the ERPs. Anterior to the N-F line, the ear is truncated as illustrated in Figure 7-1b. The ear truncation is introduced to avoid the handset from touching the ear lobe, which can cause unstable handset positioning at the cheek.

Figure 7-1a

Front, back and side view of SAM (model for the phantom shell)



Figure 7-1b

Close up side view of phantom showing the ear region

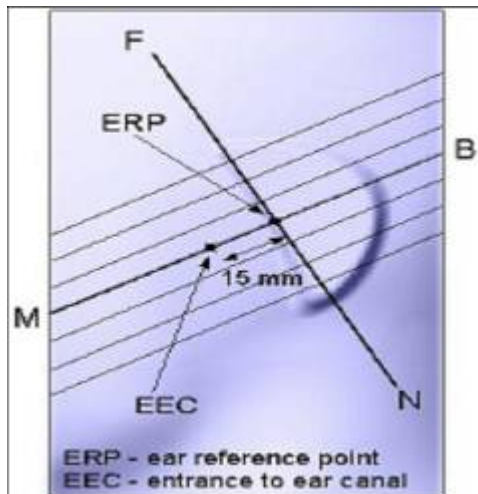


Figure 7-1b

Close up side view of phantom showing the ear region

Figure 7-1c

Side view of the phantom showing relevant markings and the 7 cross sectional plane locations

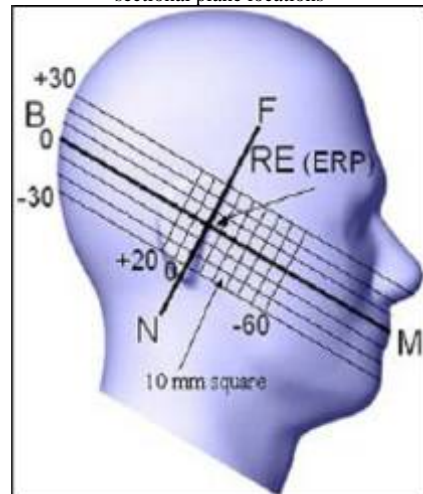


Figure 7-1c

Side view of the phantom showing relevant markings and the 7 cross sectional plane locations

**DEFINITION OF THE “CHEEK/TOUCH” POSITION**

The “cheek” or “touch” position is defined as follows:

- a. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece, open the cover. (If the handset can also be used with the cover closed both configurations must be tested.)
- b. Define two imaginary lines on the handset: the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width  $w_t$  of the handset at the level of the acoustic output (point A on Figures 7-2a and 7-2b), and the midpoint of the width  $w_b$  of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Figure 7-2a). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output. However, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see Figure 7-2b), especially for clamshell handsets, handsets with flip pieces, and other irregularly-shaped handsets.
- c. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 7-2c), such that the plane defined by the vertical center line and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.
- d. Translate the handset towards the phantom along the line passing through RE and LE until the handset touches the pinna.
- e. e) While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane).
- f. Rotate the handset around the vertical centerline until the handset (horizontal line) is symmetrical with respect to the line NF.
- g. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE and maintaining the handset contact with the pinna, rotate the handset about the line NF until any point on the handset is in contact with a phantom point below the pinna (cheek). See Figure 7-2c. The physical angles of rotation should be noted.

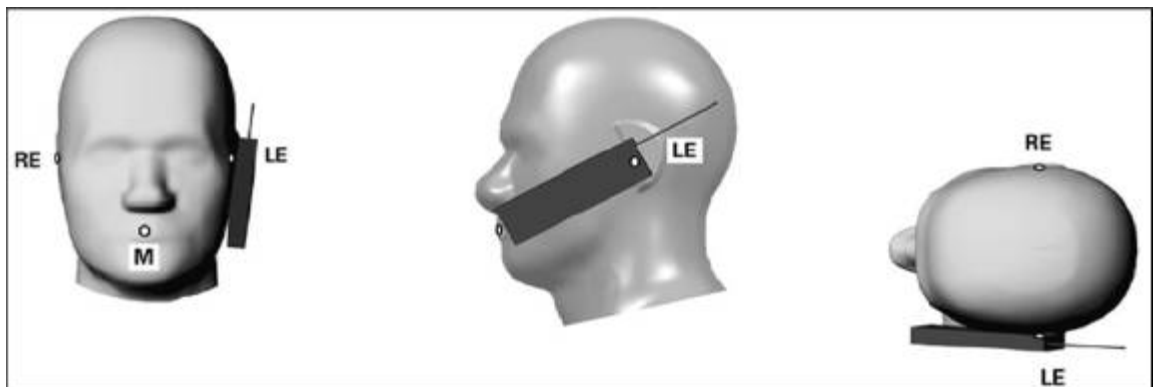


Figure 7.2c

Phone “cheek” or “touch” position. The reference points for the right ear (RE), left ear (LE) and mouth (M), which define the reference plane for handset positioning, are indicated.

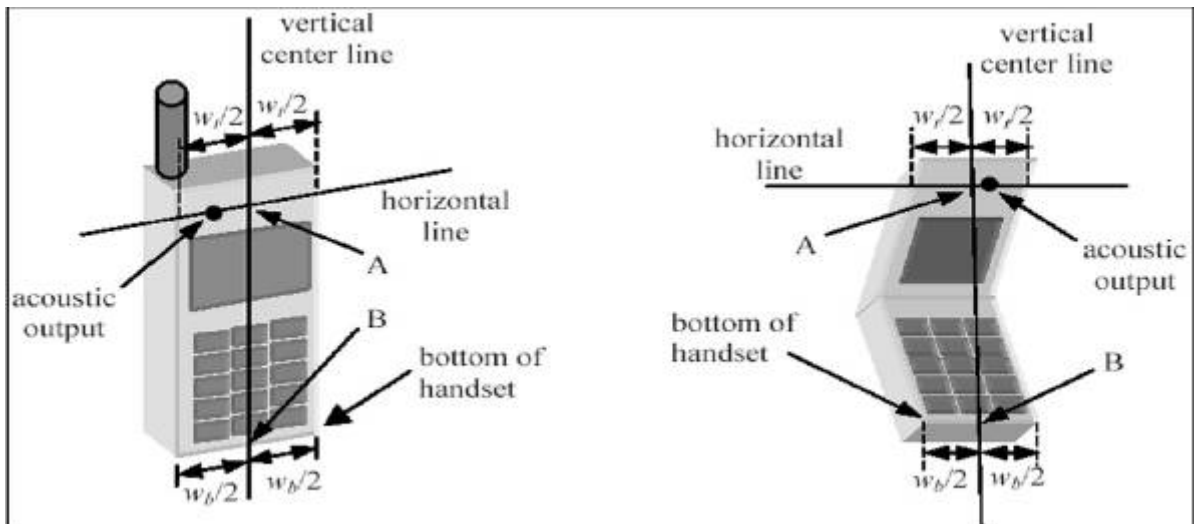


Figure 7.2a

Figure 7.2b

### DEFINITION OF THE “TILTED” POSITION

The “tilted” position is defined as follows:

- Repeat steps (a) – (g) of 7.2 to place the device in the “cheek position.”
- While maintaining the orientation of the handset move the handset away from the pinna along the line passing through RE and LE in order to enable a rotation of the handset by 15 degrees.
- Rotate the handset around the horizontal line by 15 degrees.
- While maintaining the orientation of the handset, move the handset towards the phantom on a line passing through RE and LE until any part of the handset touches the ear. The tilted position is obtained when the contact is on the pinna. If the contact is at any location other than the pinna (e.g., the antenna with the back of the phantom head), the angle of the handset should be reduced. In this case, the tilted position is obtained if any part of the handset is in contact with the pinna as well as a second part of the handset is contact with the phantom (e.g., the antenna with the back of the head).

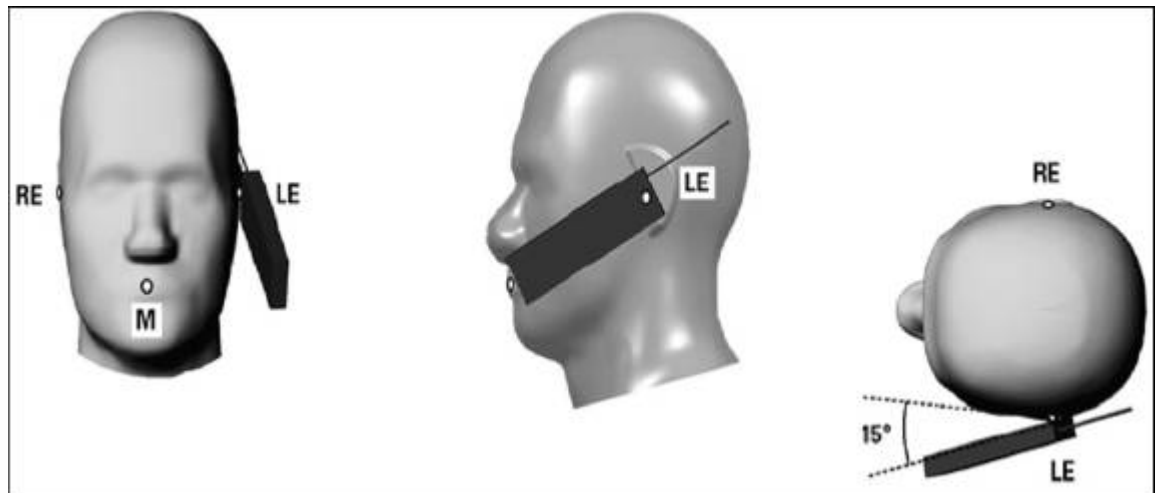


Figure 7-3

Phone “tilted” position. The reference points for the right ear (RE), left ear (LE) and mouth (M), which define the reference plane for handset positioning, are indicated.





## 8. MEASUREMENT RESULTS

### 8.1 SYSTEM VALIDATION

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  $\pm 10\%$ . The system performance check results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

IEEE P1528 Recommended Reference Value:

| Frequency (MHz) | 1g SAR | 10g SAR | Local SAR at Surface (Above Feed Point) | Local SAR at Surface (y = 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   |

### SYSTEM PERFORMANCE CHECK MEASUREMENT CONDITIONS

- The measurements were performed in the flat section of the SAM twin phantom filled with Head and Body simulating liquid of the following parameters.
- The OPENSAR system with an E-field probe EP74 SN0807 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 15 mm (below 1 GHz) and 10 mm (above 1 GHz) from dipole center to the simulating liquid surface.
- The 1g and 10 g spatial average SAR values normalized to 1 W dipole input power give reference data for comparisons.



## 8.2 TEST LIQUID CONFIRMATION

### Simulated Tissue Liquid Parameter confirmation

The dielectric parameters were checked prior to assessment using the HP85070C dielectric probe kit. The dielectric parameters measured are reported in each correspondent section.

### IEEE SCC-34/SC-2 P1528 recommended Tissue Dielectric Parameters

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

| Target Frequency<br>(MHz) | Head         |                | Body         |                |
|---------------------------|--------------|----------------|--------------|----------------|
|                           | $\epsilon_r$ | $\sigma$ (S/m) | $\epsilon_r$ | $\sigma$ (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                      | 45.3         | 5.27           | 48.2         | 6.00           |

*Note:*  $\epsilon_r$  = relative permittivity,  $\sigma$  = conductivity and  $\rho = 1000 \text{ kg/m}^3$

**System validation Results**

**Ambient condition:**

Temperature: 22 °C

Relative humidity: 58%

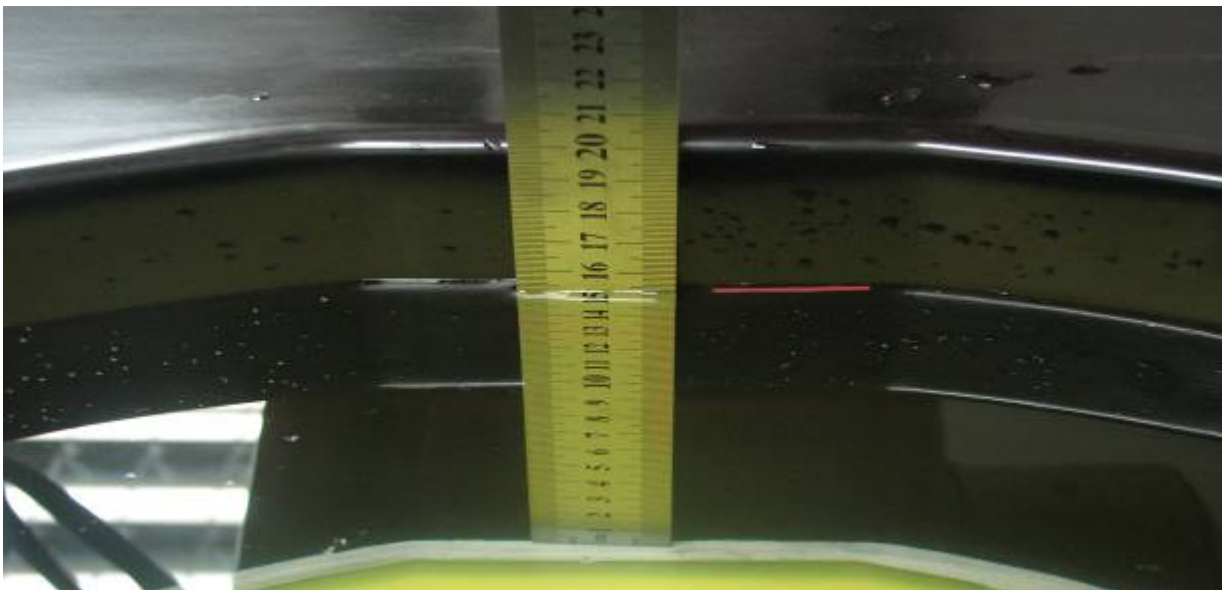
**Date:** July 24, 2009

| Medium   |           |                  | Parameter    | Target | Measured | Deviation (%) | Limit (%) |
|----------|-----------|------------------|--------------|--------|----------|---------------|-----------|
| Type     | Temp (°C) | Depth (± 0.5 cm) |              |        |          |               |           |
| Muscle   | 20.00     | 15.00            | Permittivity | 53.12  | 52.403   | 1.35          | +/-5      |
| 2450 MHz |           |                  | Conductivity | 1.95   | 1.940    | 0.51          | +/- 5     |
|          |           |                  | 1g SAR       | 50.22  | 51.234   | -2.02         | +/- 10    |

**8.3 EUT TUNE-UP PROCEDURE**

The following procedure had been used to prepare the EUT for the SAR test.

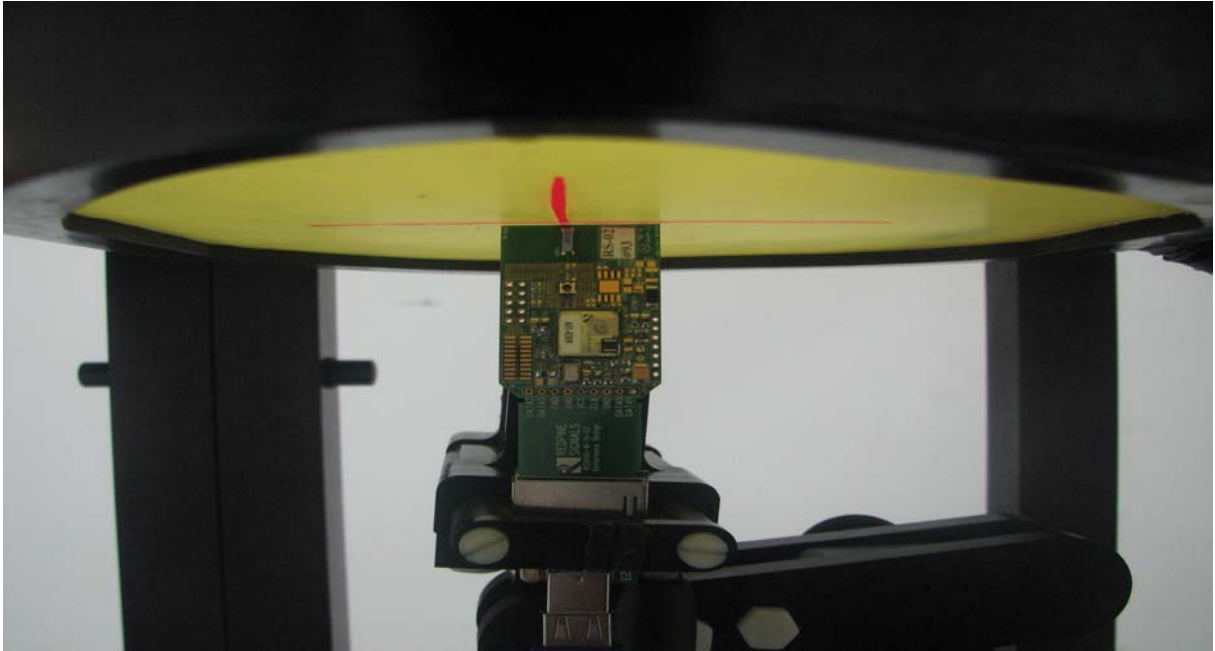
- The EUT was link with base station simulator in SAR testing periods, the base station simulator allowing it to continually transmit the maximum power and change the channel frequency.
- The conducted power was measured at the high, middle and low channel frequency before and after the SAR measurement.
- the depth of Liquid must above 15cm.



## 8.4 EUT SETUP PHOTOS

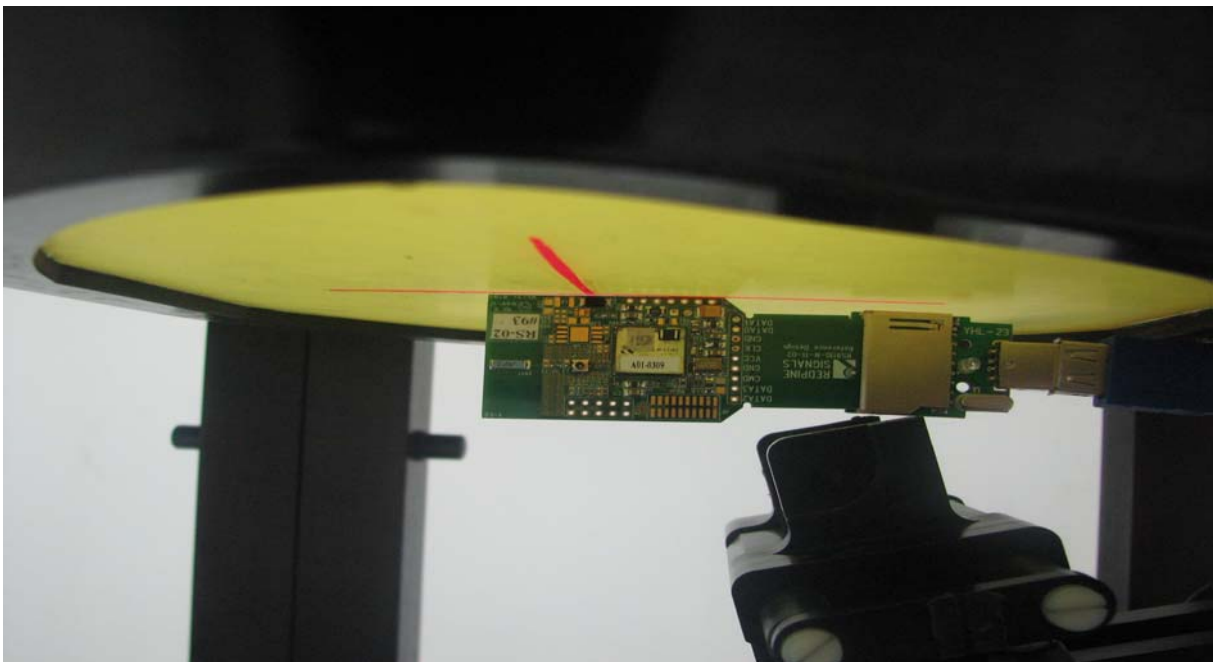
### EUT Setup Configuration 1

1. Spacing between EUT and phantom - In contact (0 cm).



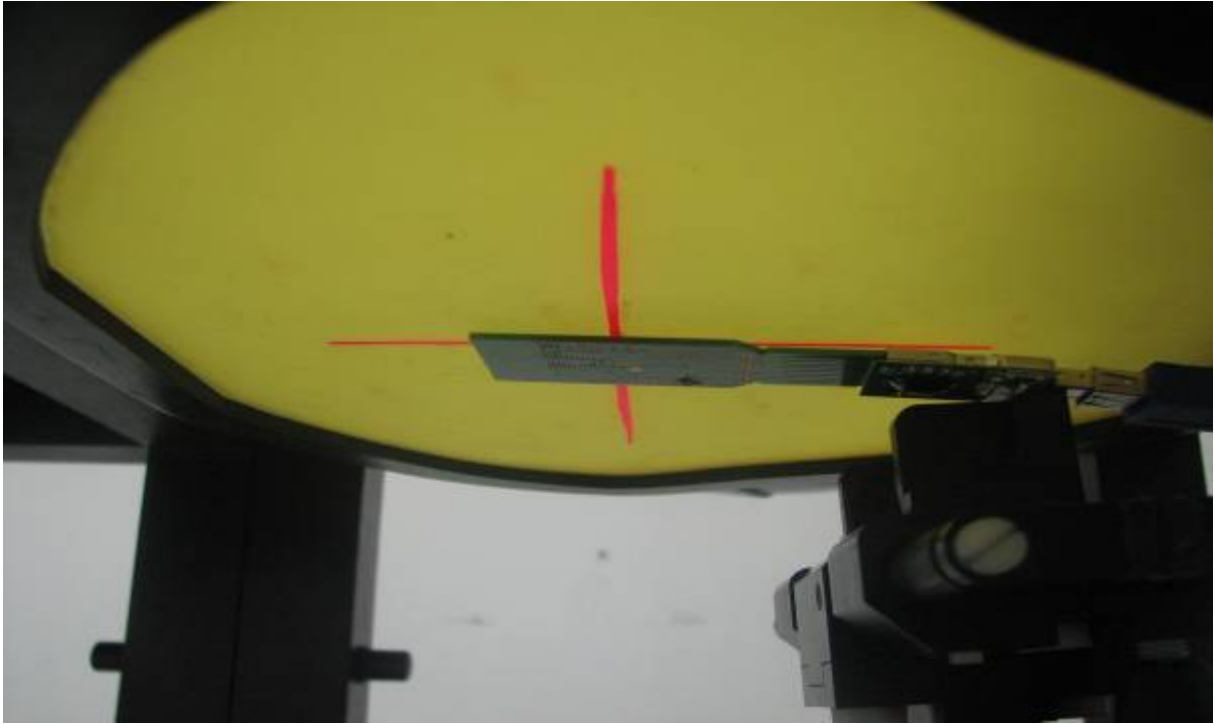
### EUT Setup Configuration 2

1. Spacing between EUT and phantom - In contact (0 cm).



**EUT Setup Configuration 3**

2. Spacing between EUT and phantom - In contact (0 cm).





### 8.5 SAR MEASUREMENT RESULT

Date of Measurement: July 24, 2009

| <b>SAR Measurement EUT Setup Configuration 1</b> |         |                 |      |                            |       |                                 |                |              |
|--|---------|-----------------|------|----------------------------|-------|---------------------------------|----------------|--------------|
| Crest Factor: 1 (Duty cycle: 100%)               |         |                 |      |                            |       | Depth of Liquid: <u>15.0</u> cm |                |              |
| <b>B mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11b 1       | 2412 | 12.12                      | 12.11 | 20.0                            | <b>0.156</b>   | 1.6          |
|  |         | 802.11b 6       | 2437 | 12.36                      | 12.33 | 20.0                            | 0.142          |              |
|  |         | 802.11b 11      | 2462 | 12.29                      | 12.27 | 20.0                            | 0.123          |              |
| <b>G mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11g 1       | 2412 | 10.32                      | 10.30 | 20.0                            | <b>0.141</b>   | 1.6          |
|  |         | 802.11g 6       | 2437 | 10.46                      | 10.44 | 20.0                            | 0.132          |              |
|  |         | 802.11g 11      | 2462 | 10.51                      | 10.50 | 20.0                            | 0.121          |              |
| <b>20n mode</b>                                  |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11n HT20 1  | 2412 | 10.38                      | 10.37 | 20.0                            | <b>0.183</b>   | 1.6          |
|  |         | 802.11n HT20 6  | 2437 | 10.27                      | 10.25 | 20.0                            | 0.165          |              |
|  |         | 802.11n HT20 11 | 2462 | 10.62                      | 10.60 | 20.0                            | 0.144          |              |



Date of Measurement: July 24, 2009

| <b>SAR Measurement EUT Setup Configuration 2</b> |         |                 |      |                            |       |                                 |                |              |
|--|---------|-----------------|------|----------------------------|-------|---------------------------------|----------------|--------------|
| Crest Factor: 1 (Duty cycle: 100%)               |         |                 |      |                            |       | Depth of Liquid: <u>15.0</u> cm |                |              |
| <b>B mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11b 1       | 2412 | 12.12                      | 12.11 | 20.0                            | <b>0.359</b>   | 1.6          |
|  |         | 802.11b 6       | 2437 | 12.36                      | 12.33 | 20.0                            | 0.345          |              |
|  |         | 802.11b 11      | 2462 | 12.29                      | 12.27 | 20.0                            | 0.332          |              |
| <b>G mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11g 1       | 2412 | 10.32                      | 10.30 | 20.0                            | <b>0.357</b>   | 1.6          |
|  |         | 802.11g 6       | 2437 | 10.46                      | 10.44 | 20.0                            | 0.355          |              |
|  |         | 802.11g 11      | 2462 | 10.51                      | 10.50 | 20.0                            | 0.351          |              |
| <b>20n mode</b>                                  |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11n HT20 1  | 2412 | 10.38                      | 10.37 | 20.0                            | <b>0.362</b>   | 1.6          |
|  |         | 802.11n HT20 6  | 2437 | 10.27                      | 10.25 | 20.0                            | 0.359          |              |
|  |         | 802.11n HT20 11 | 2462 | 10.62                      | 10.60 | 20.0                            | 0.354          |              |



Date of Measurement: July 24, 2009

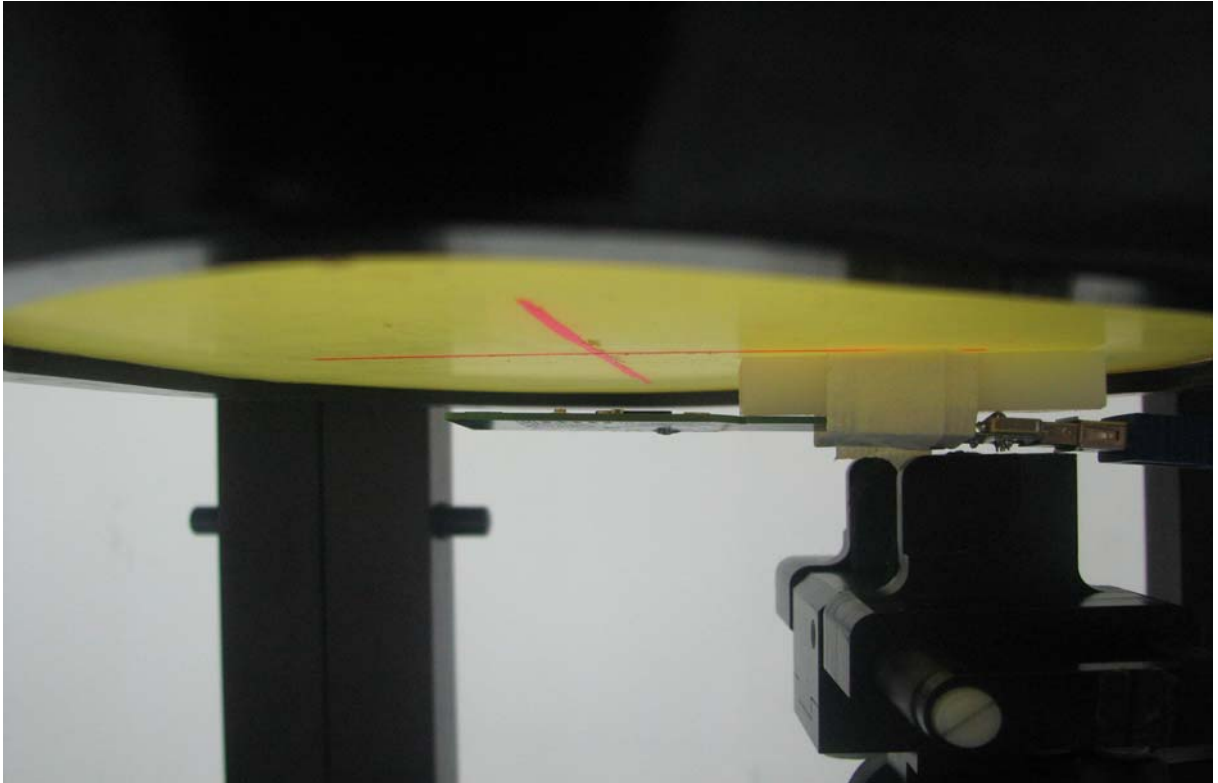
| <b>SAR Measurement EUT Setup Configuration 3</b> |         |                 |      |                            |       |                                 |                |              |
|--|---------|-----------------|------|----------------------------|-------|---------------------------------|----------------|--------------|
| Crest Factor: 1 (Duty cycle: 100%)               |         |                 |      |                            |       | Depth of Liquid: <u>15.0</u> cm |                |              |
| <b>B mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11b 1       | 2412 | 12.12                      | 12.11 | 20.0                            | <b>0.679</b>   | 1.6          |
|  |         | 802.11b 6       | 2437 | 12.36                      | 12.33 | 20.0                            | 0.665          |              |
|  |         | 802.11b 11      | 2462 | 12.29                      | 12.27 | 20.0                            | 0.646          |              |
| <b>G mode</b>                                    |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11g 1       | 2412 | 10.32                      | 10.30 | 20.0                            | <b>0.664</b>   | 1.6          |
|  |         | 802.11g 6       | 2437 | 10.46                      | 10.44 | 20.0                            | 0.655          |              |
|  |         | 802.11g 11      | 2462 | 10.51                      | 10.50 | 20.0                            | 0.644          |              |
| <b>20n mode</b>                                  |         |                 |      |                            |       |                                 |                |              |
| EUT Setup Condition                              |         | Frequency       |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position   | Antenna | Channel         | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>                                      | Fixed   | 802.11n HT20 1  | 2412 | 10.38                      | 10.37 | 20.0                            | <b>0.706</b>   | 1.6          |
|  |         | 802.11n HT20 6  | 2437 | 10.27                      | 10.25 | 20.0                            | 0.689          |              |
|  |         | 802.11n HT20 11 | 2462 | 10.62                      | 10.60 | 20.0                            | 0.667          |              |



**Enhanced energy coupling test:**

**EUT Setup Configuration 4**

1. Spacing between EUT and phantom –0.5cm.

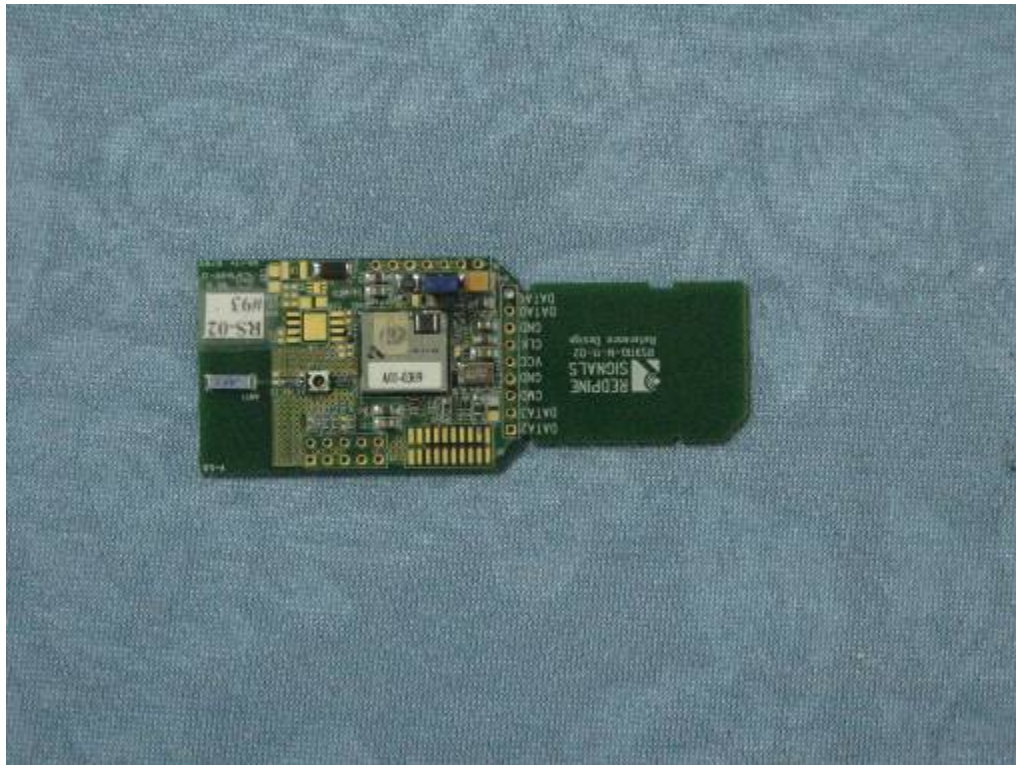




Date of Measurement: July 24, 2009

| <b>SAR Measurement</b>  |         | <b>EUT Configuration 4</b> |      |                            |       | enhanced energy coupling test   |                |              |
|---|---------|----------------------------|------|----------------------------|-------|---------------------------------|----------------|--------------|
| Crest Factor: 1 (Duty cycle: 100%)                                |         |                            |      |                            |       | Depth of Liquid: <u>15.0</u> cm |                |              |
| <b>20n mode</b>   |         |                            |      |                            |       |                                 |                |              |
| EUT Setup Condition   |         | Frequency                  |      | Conducted Peak Power (dBm) |       | Liquid Temp [°C]                | SAR(1g) (W/kg) | Limit (W/kg) |
| Position  | Antenna | Channel                    | MHz  | Before                     | After |                                 |                |              |
| <b>Flat</b>   | Fixed   | 802.11n HT20 1             | 2412 | 10.38                      | 10.37 | 20.0                            | 0.350          | 1.6          |
| Enhanced energy coupling test, 0.350 is less than (0.706/2=0.353) |         |                            |      |                            |       |                                 |                |              |

9. EUT PHOTOES



**10. EQUIPMENT LIST & CALIBRATION**

| Name of Equipment               | Manufacturer | Type/Model | Serial Number | Calibration Due |
|---------------------------------|--------------|------------|---------------|-----------------|
| PC                              | HP           | PV 3.06GHz | 375052-AA1    | N/A             |
| Signal Generator                | Agilent      | E8257C     | MY43321570    | 12/11/2009      |
| MultiMeter                      | Keithley     | 2000       | 1015843       | 05/01/2010      |
| S-Parameter Network Analyzer    | Agilent      | E5071B     | MY42301382    | 08/07/2009      |
| Wireless Communication Test Set | Agilent      | E5515C     | QB44051695    | 06/17/2010      |
| Wireless Communication Test Set | R&S          | CMU200     | B23-03291     | 07/29/2009      |
| Power Meter                     | Agilent      | E4416A     | QB41292714    | 12/11/2009      |
| E-field PROBE                   | ANTENNESSA   | EP_100     | SN11/09       | 04/16/2010      |
| DIPOLE 835                      | ANTENNESSA   | DIPC32     | SN 48_05      | 12/10/2009      |
| DIPOLE 900                      | ANTENNESSA   | DIPD33     | SN 48_05      | 12/10/2009      |
| DIPOLE 1800                     | ANTENNESSA   | DIPF34     | SN 48_05      | 12/10/2009      |
| DIPOLE 1900                     | ANTENNESSA   | DIPG35     | SN 48_05      | 12/10/2009      |
| DIPOLE 2000                     | ANTENNESSA   | DIPI36     | SN 48_05      | 12/10/2009      |
| DIPOLE 2450                     | ANTENNESSA   | DIPJ37     | SN 48_05      | 12/10/2009      |
| POSITIONING DEVICE              | ANTENNESSA   | MSH_14     | SN 41_05      | N/A             |
| DUMMY PROBE                     | ANTENNESSA   | DP_12      | SN 39_05      | N/A             |
| SAM PHANTOM                     | ANTENNESSA   | SAM29      | SN 41_05      | N/A             |
| PHANTON WOOD TABLE              | ANTENNESSA   | N/A        | N/A           | N/A             |
| 6 AXIS ROBOT                    | KUKA         | KR3        | 846428        | N/A             |
| ROBOT KRC                       | KUKA         | KCP2       | 01436         | N/A             |
| CHANNELS SCAN CARD              | KEITHLEY     | 2000       | 2000-172-01B  | N/A             |
| PROBE/ROBOT POSITIONING DEVICE  | ANTENNESSA   | MSH14      | SN 41_05      | N/A             |
| LIQUID CALIBRATION KIT          | ANTENNESSA   | 41/05 OCP9 | 00425167      | N/A             |



## 11. FACILITIES

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

- No.10, Weiye Rd., Innovation Park, Eco & Tec. Development Part, Kunshan City, Jiangsu Province, PRC.

## 12. REFERENCES

- [1] Federal Communications Commission, \Report and order: Guidelines for evaluating the environmental effects of radio frequency radiation", Tech. Rep. FCC 96-326, FCC, Washington, D.C. 20554, 1996.
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**13. ATTACHMENT**

| <b>Exhibit</b> | <b>Content</b>                          |
|----------------|---|
| 1              | System Validation Plots                 |
| 2              | SAR Test Plots                          |
| 3              | Dosimetric E-Field Probe – EP74 SN 0807 |
| 4              | Validation Dipole                       |

*End of Report*