



**SAR Evaluation Report  
for  
FCC OET Bulletin 65 Supplement C**

**Report No.: SSAR1112029**

Client : AEG Portuguesa , S.A.  
Product : GSM Mobile Phone  
Model : AEG S40  
FCC ID : XM8AEGS40  
Manufacturer/ supplier : EZFONE TELECOMMUNICATION LTD  
Date test item received : Dec 13,2011  
Date test campaign completed : Dec 16,2011  
Date of issue : Jan 5,2012  
Test Result : Compliance Not Compliance

**Statement of Compliance:**

The SAR values measured for the test sample are below the maximum recommended level of 1.6 W/kg averaged over any 1g tissue according to FCC OET Bulletin 65 Supplement C(Edition 01-01, June 2001)

**The test result only corresponds to the tested sample. It is not permitted to copy this report, in part or in full, without the permission of the test laboratory.**

*Total number of pages of this test report: 31 pages*

Test Engineer:

Jeff Fang

Approved bv:

Miro Chueh

The testing described in this report has been carried out to the best of our knowledge and ability, and our responsibility is limited to the exercise of reasonable care. This certification is not intended to relieve the sellers from their legal and/or contractual obligations.



## Applicant Information

<b>Client</b>	: AEG Portuguesa , S.A.
<b>Address</b>	: Rua Joao Saraiva, 4-6, 1700-249 LISBOA, Portugal
<b>Manufacturer</b>	: EZFONE TELECOMMUNICATION LTD
<b>Address</b>	: Flat 3,8 Floor,Lemmi Centre,50 Hoi Yuen Road,Kwun Tong, Kowloon,HongKong
<b>EUT</b>	: GSM Mobile Phone
<b>Model No.</b>	: AEG S40
<b>Standard Applied</b>	: FCC OET 65 Supplement C (Edition 01-01, June 2001) IEEE Standard 1528-2003
<b>Laboratory</b>	: CERPASS TECHNOLOGY CORP. No.66,Tangzhuang Road, Suzhou Industrial Park, Jiangsu 215006, China.
<b>Test Location</b>	: No.789, Pu Xing Road, Shanghai, China
<b>Test Result</b>	: Maximum SAR Measurement GSM 850:0.886 W/kg(1g) (Fat body back channel 128) GSM 1900:0.267 W/kg(1g) (Right Tilted channel 810)

**The EUT is in compliance with the FCC Report, and the tests were performed according to the FCC OET65c for uncontrolled exposure.**



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## **Executive Summary**

The EUT is a GSM Mobile Phone. The product operating in 850MHz and 1900MHz frequency ranges. This device contains GSM function that is operational in GSM850 and DCS 1900 mode. The measurement was conducted by CERPASS and carried out with the dosimetric assessment system under ALSAS-10-U.

The measurements were conducted according to FCC OET 65 Supplement C [Reference 5] for evaluating compliance with requirements of FCC Report .

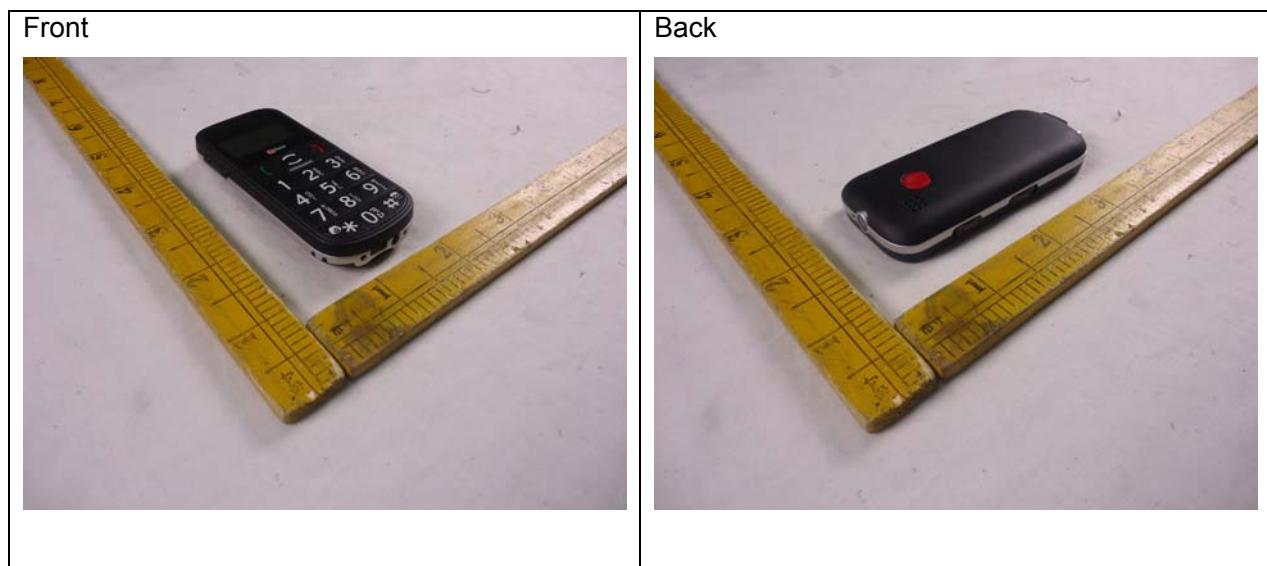


## 1. General Information

### 1.1. Description of Equipment under Test

EUT Type	Production unit <input checked="" type="checkbox"/> Identical prototype <input type="checkbox"/>
EUT	GSM Mobile Phone
Model Name	AEG S40
Hardware Version	V2-V1.3
Software Version	V6_22_V1.0.002-20110607-AEG
TX Frequency	GSM 850:824-849 Mhz GSM 1900:1850-1910 Mhz
RX Frequency	GSM 850:869-894 Mhz GSM 1900:1930-1990 Mhz
Antenna Type	Internal PIFA
Device Category	Portable
RF Exposure Environment	General Population/ Uncontrolled
Crest Factor	8

### 1.2. Photograph of EUT





### 1.3. Description of support units

The SAR evaluation was performed on the following hosts:

Host#	Description	Manufacturer	Model	Overall Dimension
1	N/A	N/A	N/A	N/A

Cable#	Description	Manufacturer	Type	Length
1	N/A	N/A	N/A	N/A



#### 1.4. Environment Condition

Item	Target	Measured
Ambient Temperature(°C)	18~25	22±1
Temperature of Simulant(°C)	20~24	22±1
Relative Humidity(%RH)	30~70	60~70

#### 1.5. FCC Requirement of SAR Compliance Testing

According to the FCC order “Guidelines for Evaluating the Environmental Effects of RF Radiation”, for consumer products, the SAR limit is **1.6 W/kg** for an uncontrolled environment and **8.0 W/kg** for an occupational/controlled environment. Pursuant to the Supplement C of OET Bulletin 65 “Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields”, released on June 29, 2001 by FCC, the equipment under test should be evaluated at maximum output power (radiated from the antenna) under “worst-case” conditions for intended or normal operation, incorporating normal antenna operating positions, equipment undet test peak performance frequencies and positions for maximum RF power coupling.

##### 1.6.1 RF Exposure Limits

	Whole-Body	Partial-Body	Arms and Legs
Population/ Uncontrolled Environments(W/kg)	0.08	1.6	4.0
Occupational/ Controlled Environments(W/Kg)	0.4	8.0	20.0

##### Notes:

1. Population/Uncontrolled Environments: Locations where there is the exposure of individuals who have no sense or control of their exposure.
2. Occupational/Controlled Environments: Locations where there is exposure that may be incurred by people who have knowledge of the potential for exposure.
3. Whole-Body: SAR is averaged over the entire body.
4. Partial-Body: SAR is averaged over any 1g of tissue volume as defined in specification.
5. Arms and Legs: SAR is averaged over 10g of tissue volume as defined in specification.



## 1.6. The SAR Measurement Procedure

### 1.7.1 General Requirements

The test should be performed in a laboratory without influence on SAR measurements by ambient RF sources and any reflection from the environment inside. The ambient temperature should be kept in the range of 20°C to 22°C with a maximum variation within  $\pm 2^\circ\text{C}$  during the test.

### 1.7.2 Phantom Requirements

The phantoms used in test are simplified representations of the human head and body as a specific shaped container for the head or body simulating liquids. The physical characteristics of the phantom models should resemble the head and the body of a mobile user since the shape is a dominant parameter for exposure. The shell of the phantom should be made of low loss and low permittivity material and the thickness tolerance should be less than 0.2 mm. In addition, the phantoms should provide simulations of both right and left hand operations.

### 1.7.3 Test Positions

1. The horizontal-down and horizontal-up of EUT contact to the flat phantom. The transmitted antenna of the EUT located under the reference point of the flat phantom. The separation distance is 5mm between the top of the EUT and the bottom of the flat phantom. The area scan size is 41 x 61 points.
2. The vertical-back and vertical-front of EUT contact to the flat phantom. The transmitted antenna of the EUT located under the reference point of the flat phantom. The separation distance is 5mm between the top of the EUT and the bottom of the flat phantom. The area scan size is 31 x 61 points.

### 1.7.4 Test Procedures

The EUT (GSM Mobile phone) connected with the Universal Work Station. Then record the conducted power before the testing. Place the EUT to the specific test location. After the testing, must writing down the conducted power of the EUT into the report. The SAR value was calculated via the 3D spine interpolation algorithm that has been implemented in the software of ALSAS-10-U SAR measurement system manufactured and calibrated by APREL.



## 2. Description of the Test Equipment

ALSAS-10-U is fully compliant with the technical and scientific requirements of IEEE 1528, IEC 62209, CENELEC, ARIB, ACA, and the Federal Communications Commission. The system comprises of a six axes articulated robot which utilizes a dedicated controller. ALSAS-10U uses the latest methodologies and FDTD order to provide a platform which is repeatable with minimum uncertainty. Applications: Predefined measurement procedures compliant with the guidelines of CENELEC, IEEE, IEC, FCC, etc are utilized during the assessment for the device. Automatic detection for all SAR maxima are embedded within the core architecture for the system, ensuring that peak locations used for centering the zoom scan are within a 1mm resolution and a 0.05mm repeatable position. System operation range currently is available up to 6 GHz in simulated tissue.

### 2.1. Test Equipment List

Instrument	Manufacture	Model No.	Serial No.	Calibration Date	Valid Date.
Universal Work Station	Aprel	ALS-UWS	100-00154	NCR	NCR
Data Acquisition Package	Aprel	ALS-DAQ-PAQ-3	110-00215	NCR	NCR
Probe Mounting Device and Boundary Detection Sensor System	Aprel	ALS-PMDPS-3	120-00265	NCR	NCR
Miniature isotropic RF Probe	Aprel	E-020	500-00273	Oct.01,2011	Oct.01,2012
Left ear SAM Phantom	Aprel	ALS-P-SAM-L	130-00312	NCR	NCR
Right ear SAM Phantom	Aprel	ALS-P-SAM-R	140-00362	NCR	NCR
Universal SAM Phantom	Aprel	ALS-P-SU-1	150-00410	NCR	NCR
Reference Validation Dipole 835MHz	Aprel	ALS-D-835-S-2	180-00556	May.17,2011	May.17,2012
Reference Validation Dipole 1900MHz	Aprel	ALS-D-1900-S-2	210-00707	May.16,2011	May.16,2012
Dielectric Probe Kit	Aprel	ALS-PR-DIEL	260-00955	NCR	NCR
Device Holder 2.0	Aprel	ALS-H-E-SET-2	170-00506	NCR	NCR
SAR software	Aprel	ALS-SAR-AL-10	Ver.2.3.6	NCR	NCR
CRS C500C Controller	Thermo	ALS-C500	RCF0504291	NCR	NCR
CRS F3 Robot	Aprel	ALS-F3-SW	N/A	NCR	NCR
Power Amplifier	Mini-Circuit	SN0974	040306	Jul.13,2011	Jul.13,2012
Directional Coupler	Agilent	778D-012	N/A	Jul.13,2011	Jul.13,2012
Universal Radio Communication Tester	Rohde&Schwarz	CMU200	104845	Mar.11,2011	Mar.11,2012
Vector Network	Anritsu	MS4623B	N/A	Jul.18,2011	Jul.18,2012



Signal Generator	Agilent	E8257D	N/A	Dec.14,2011	Dec.14,2012
Power Meter	Rohde&Schwarz	NRP	N/A	Dec.14,2011	Dec.14,2012

## 2.2. ALSAS-10-U Measurement System

The ALSAS-10-U Measurement System





The ALSAS-10-U system consists of the following items:

- A fixed-on-ground high precision 6-axis robot with controller and software and an arm extension for moving the DAQ-PAQ and Probe.
- A dosimetric probe, an isotropic E-field probe optimized and calibrated for usage in head or body tissue simulating liquids. Some of the probes are equipped with an optical surface detector system.
- A DAQ-PAQ performing the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. DAQ-PAQ is powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- A unit to operate the optical surface detector which is connected to Electro-Optical Coupler (EOC).
- The EOC performs the conversion from the optical into a digital electric signal of the DAQ-PAQ. The EOC is connected to the ALSAS-10-U measurement server.
- The ALSAS-10-U measurement server performing all real-time data evaluation for field measurements and surface detection, controlling robot movements and handling safety operation..
- Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
- The generic twin phantom enabling the testing of left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed well according to the given recipes.
- System validation dipoles is used to validate the proper functioning of the system

### 2.3. DAQ-PAQ (Analog to Digital Electronics)

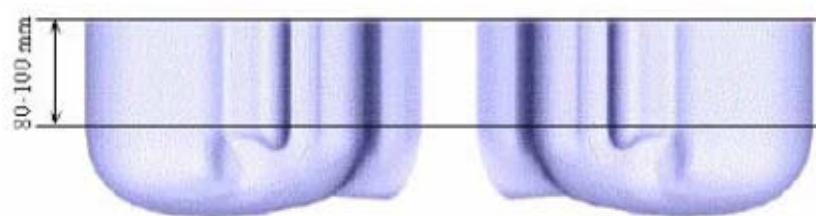
ALSAS-10U incorporates a fully calibrated SAQ-PAQ (analog to digital conversion system) which has a 4 channel input stage, sent via a 2 stage auto-set amplifier module. The input signal is amplified accordingly so as to offer a dynamic range from  $5 \mu V$  to  $800mV$ . Integration of the fields measured is carried out at board level utilizing a Co-Processor which then sends the measured fields down into the main computational module in digitized form via a RS232 communications port. Probe linearity and duty cycle compensation is carried out within the main DAQ-PAQ module.

<b>ADC</b>	12 Bit
Amplifier Range	20mV to 200mV and 150mV to 800mV
Field Integration	Local Co-Processor utilizing proprietary integration algorithms
Number of Input Channels	4 in total 3 dedicated and 1 spare
Communication	Packet data via RS232



## 2.4. APREL Phantom

The SAM phantoms developed using the IEEE SAM CAD file. They are fully compliant with the requirements for both IEEE 1528 and FCC Supplement C. Both the left and right SAM phantoms are interchangeable, transparent and include the IEEE 1528 grid with visible NF and MB lines



### APREL Laboratories Universal Phantom

The Universal Phantom is used on the ALSAS-10U as a system validation phantom. The Universal Phantom has been fully validated both experimentally from 800MHz to 6GHz and numerically using XFDTD numerical software. The shell thickness is 2mm overall, with a 4mm spacer located at the NF/MB intersection providing an overall thickness of 6mm in line with the requirements of IEEE-1528.

The design allows for fast and accurate measurements, of handsets, by allowing the conservative SAR to be evaluated at on frequency for both left and right head experiments in one measurement.





## 2.5. Device Holder

The universal device positioner allows complete freedom of movement of the EUT. Developed to hold a EUT in a free-space scenario any additional loading attributable to the material used in the construction of the positioner has been eliminated. Repeatability has been enhanced through the linear scales which form the design used to indicate positioning for any given test scenario in all major axes. A 15°tilt movements for head SAR analysis. Overall uncertainty for measurements has been reduced due to the design of the Universal device positioner, which allows positioning of a device in as near to a free-space scenario as possible, and by providing the means for complete repeatability.



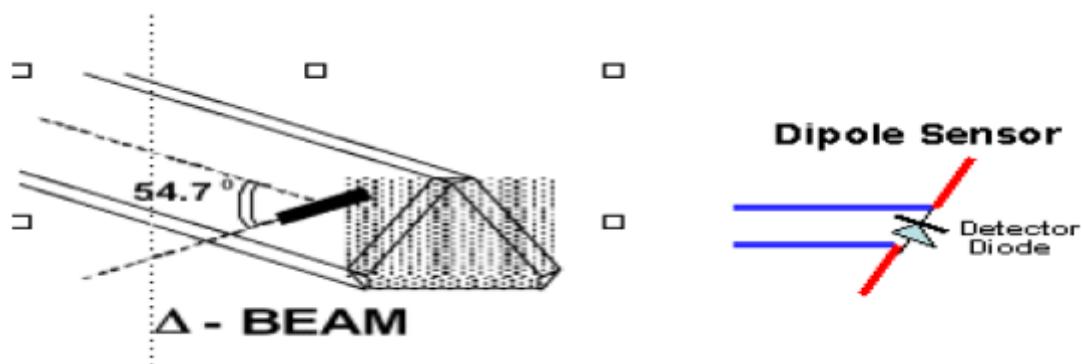


## 2.6. Specification of probes

The isotropic E-Field probe has been fully calibrated and assessed for isotropic, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change. A number of methods is used for calibrating probes, and these are outlined in the table below:

Calibration Frequency	Air Calibration	Tissue Calibration
900MHz	TEM Cell	Temperature
1800MHz	TEM Cell	Temperature

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



SAR is assessed with a calibrated probe which moves at a default height of 5mm from the center of the diode, which is mounted to the sensor, to the phantom surface (in the Z Axis). The 5mm offset height has been selected so as to minimize any resultant boundary effect due to the probe being in close proximity to the phantom surface.

The following algorithm is an example of the function used by the system for linearization of the output from the probe when measuring complex modulation schemes.

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



<b>Calibration in Air</b>	Frequency Dependent Below 2GHz Calibration in air performed in a TEM Cell Above 2GHz Calibration in air performed in waveguide
<b>Sensitivity</b>	0.70 $\mu$ V/(V/m) <sup>2</sup> to 0.85 $\mu$ V/(V/m) <sup>2</sup>
<b>Dynamic Range</b>	0.0005 W/kg to 100W/kg
<b>Isotropic Response</b>	Better than 0.2dB
<b>Diode Compression point (DCP)</b>	Calibration for Specific Frequency
<b>Probe Tip Radius</b>	< 5mm
<b>Sensor Offset</b>	1.56 (+/- 0.02mm)
<b>Probe Length</b>	290mm
<b>Video Bandwidth</b>	@ 500 Hz: 1dB @ 1.02 KHz: 3dB
<b>Boundary Effect</b>	Less than 2% for distance greater than 2.4mm
<b>Spatial Resolution</b>	Diameter less than 5mm Compliant with Standards

#### Boundary detection Unit and Probe Mounting Device

ALSAS-10U incorporates a boundary detection unit with a sensitivity of 0.05mm for detecting all types of surfaces. The robust design allows for detecting during probe tilt (probe normalize) exercises, and utilizes a second stage emergency stop. The signal electronics are directly into the robot controller for high accuracy surface detection in lateral and axial detection modes (X, Y, &Z).

The probe is mounted directly onto the Boundary Detection unit for accurate tooling and displacement calculations controlled by the robot kinematics. The probe is connected to an isolated probe interconnect where the output stage of the probe is fed directly into the amplifier stage of the DAQ-PAQ.



## 2.7. SAR Measurement Procedures in ALSAS-10-U

### Step 1 Setup a Call Connection

Establish a call in handset at the maximum power level with a base station simulator via air interface.

### Step 2 Power Reference Measurements

To measure the local E-field value at a fixed location which value will be taken as a reference value for calculating a possible power drift.

### Step 3 Area Scan

To measure the SAR distribution with a grid with spacing of 15 mm x 15 mm and kept with a constant distance to the inner surface of the phantom. Additional all peaks within 3 dB of the maximum SAR are searched.

### Step 4 Zoom Scan

At these points (maximum number of SAR peaks is two), a cube of 30 mm x 30 mm x 30 mm is applied to and measured with 7 x 7 x 7 points. With these measured data, a peak spatial-average SAR value can be calculated by APREL software.

### Step 5 Power Drift Measurements

Repetition of the E-field measurement at the fixed location mentioned in Step 1 to make sure the two results differ by less than  $\pm 0.2$  dB.

**The depth of Liquid must above 15cm**





## 2.8. System Performance Check

### 2.10.1 Purpose

1. To verify the simulating liquids are valid for testing.
2. To verify the performance of testing system is valid for testing.

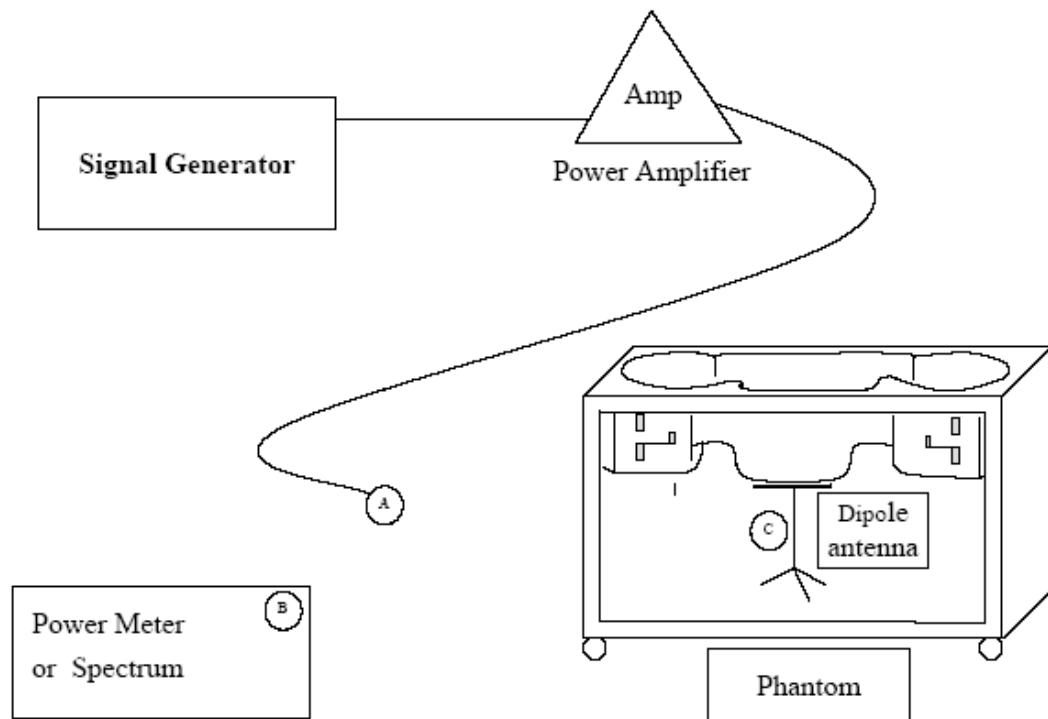
### 2.10.2 System Performance Check Procedure

The ALSAS-10-U installation includes predefined files with recommended procedures for measurements and the system performance check. They are read-only document files and destined as fully defined but unmeasured masks, so the finished system performance check must be saved under a different name. The system performance check document requires the SAM Twin Phantom, so this phantom must be properly installed in your system. (User defined measurement procedures can be created by opening a new document or editing an existing document file). Before you start the system performance check, you need only to tell the system with which components (probe, medium, and device) you are performing the system performance check; the system will take care of all parameters.

- **The Power Reference Measurement and Power Drift Measurement** jobs are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the amplifier output power. If it is too high (above  $\pm 0.1$  dB), the system performance check should be repeated; some amplifiers have very high drift during warm-up. A stable amplifier gives drift results in the ALSAS-10-U system below  $\pm 0.02$  dB.
- **The Surface Check** job tests the optical surface detection system of the ALSAS-10-U system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above  $\pm 0.1$  mm). In that case it is better to abort the system performance check and stir the liquid.
- **The Area Scan** job measures the SAR above the dipole on a plane parallel to the surface. It is used to locate the approximate location of the peak SAR. The proposed scan uses large grid spacing for faster measurement; due to the symmetric field, the peak detection is reliable. APREL Lab, ALSAS-10-U Manual, System Performance Check Application Notes If a finer graphic is desired, the grid spacing can be reduced. Grid spacing and orientation have no influence on the SAR result.
- **The Zoom Scan** job measures the field in a volume around the peak SAR value assessed in the previous Area Scan job (for more information see the application note on SAR evaluation). If the system performance check gives reasonable results, the SAR peak, 1 g and 10 g spatial average SAR values normalized to 1W dipole input power give reference data for comparisons. The next sections analyze the expected uncertainties of these values, as well as additional checks for further information or troubleshooting.



### 2.10.3 System Performance Check Setup



Note :

1. A connected to B is used to make sure whether the input power is 250mW for target frequency..
2. A connected to C is used to input the measured power to dipole antenna

**2.10.4 Result of System Performance Check: Valid Result**

<b>Date of Measurement And Reference Value</b>	<b>SAR@1g [W/kg]</b>	<b>Dielectric Parameters</b>		<b>Temperatures [°C]</b>
		$\epsilon_r$	$\sigma$ [S/m]	
Head 835MHz Recommended Value	9.590±10% [8.631 ~ 10.55]	41.09 ±10% [36.98 ~ 45.20]	0.89 ± 5% [0.85 ~ 0.93]	20.0 ± 2 [18 ~ 22]
	9.87	41.02	0.90	21

<b>Date of Measurement And Reference Value</b>	<b>SAR@1g [W/kg]</b>	<b>Dielectric Parameters</b>		<b>Temperatures [°C]</b>
		$\epsilon_r$	$\sigma$ [S/m]	
Head 1900MHz Recommended Value	39.378±10% [35.44 ~ 43.32]	38.12 ±10% [34.31 ~ 41.93]	1.41 ± 5% [1.34 ~ 1.48]	20.0 ± 2 [18 ~ 22]
	39.47	38.27	1.36	21

<b>Date of Measurement And Reference Value</b>	<b>SAR@1g [W/kg]</b>	<b>Dielectric Parameters</b>		<b>Temperatures [°C]</b>
		$\epsilon_r$	$\sigma$ [S/m]	
Body 835MHz Recommended Value	9.981±10% [8.98 ~ 10.98]	53.15 ±10% [47.84 ~ 58.47]	0.95 ± 5% [0.90 ~ 1.00]	20.0 ± 2 [18 ~ 22]
	9.90	51.65	0.97	21

<b>Date of Measurement And Reference Value</b>	<b>SAR@1g [W/kg]</b>	<b>Dielectric Parameters</b>		<b>Temperatures [°C]</b>
		$\epsilon_r$	$\sigma$ [S/m]	
Body 1900MHz Recommended Value	39.654±10% [35.69 ~ 43.62]	51.52±10% [46.37 ~ 56.67]	1.57± 5% [1.49 ~ 1.65]	20.0 ± 2 [18 ~ 22]
	38.76	50.53	1.56	21



### 3. Results

#### 3.1. Summary of Test Results

No deviations from the technical specification(s) were ascertained in the course of the tests performed	<input checked="" type="checkbox"/>
The deviations as specified in this chapter were ascertained in the course of the tests Performed.	<input type="checkbox"/>

#### 3.2. Description for EUT test position

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

- o The client supplied a special driver to program the EUT, allowing it to continually transmit the specified maximum power and change the channel frequency.
- o The output power(dBm) we measured before SAR test in different channel
- o Performing the highest output power channel first
- o SAR test Tip edge and Bottom Flat mode.

#### 3.3. Conducted power:

GSM	Frequency		GSM mode(Burst Average power)	
	Channel	MHz	before	after
GSM850	128	824.2	<b>32.39</b>	32.37
	190	836.6	32.25	32.22
	251	848.8	32.17	32.15
GSM	Frequency		GSM mode(Burst Average power)	
	Channel	MHz	before	after
GSM1900	512	1850.2	<b>29.78</b>	29.75
	661	1880.0	29.61	29.58
	810	1909.8	29.47	29.44

Note:

GSM	Frequency		GSM mode(Source_based time Average power)
	Channel	MHz	
GSM850	128	824.2	23.36
	190	836.6	23.22
	251	848.8	23.14
GSM	Frequency		GSM mode(Source_based time Average power)
	Channel	MHz	
GSM1900	512	1850.2	20.75
	661	1880.0	20.58
	810	1909.8	20.44

1. The division factor compared to the number of TX time slot:

GSM division factor:-9.03(1 TX time slot)



### 3.4. Check the position for the worst result

Duty Cycle: 12.5%, Crest Factor: 8		Depth of liquid: 15.0 cm				
EUT Position	Angle / Space	Band	Channel	Liquid Temp _°C	SAR (10g) (W/kg)	Limit (W/kg)
Left Cheek	0°	GSM850	190	21.0	0.648	
Left Tilted	15°	GSM850	190	21.0	0.622	
Right Cheek	0°	GSM850	190	21.0	0.706	
Right Tilted	15°	GSM850	190	21.0	0.675	
Right Cheek	0°	GSM850	128	21.0	0.402	
Right Cheek	0°	GSM850	251	21.0	0.778	
Left Cheek	0°	GSM1900	661	21.0	0.119	
Left Tilted	15°	GSM1900	661	21.0	0.116	
Right Cheek	0°	GSM1900	661	21.0	0.166	
Right Tilted	15°	GSM1900	661	21.0	0.182	
Right Tilted	15°	GSM1900	512	21.0	0.145	
Right Tilted	15°	GSM1900	810	21.0	0.267	
Flat Body	face with 1.5 cm gap	GSM850	190	21.0	0.587	
Flat Body	back with 1.5 cm gap	GSM850	190	21.0	0.658	
Flat Body	back with 1.5 cm gap	GSM850	128	21.0	0.886	
Flat Body	back with 1.5 cm gap	GSM850	251	21.0	0.531	
Flat Body	face with 1.5 cm gap	GSM1900	661	21.0	0.041	
Flat Body	back with 1.5 cm gap	GSM1900	661	21.0	0.072	
Flat Body	back with 1.5 cm gap	GSM1900	512	21.0	0.045	
Flat Body	back with 1.5 cm gap	GSM1900	810	21.0	0.202	

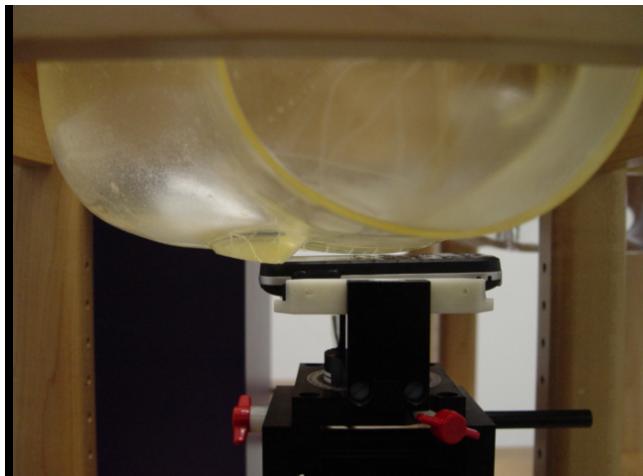
Notes: 1) Please refer to attachment for the result presentation in plot format.

1.6

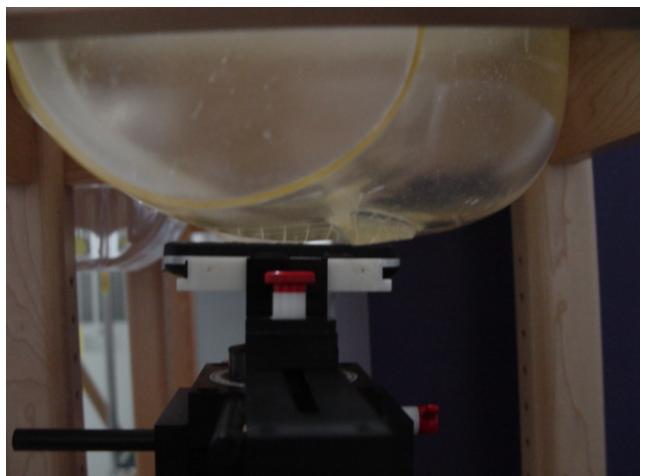


### 3.5. Measurement Position

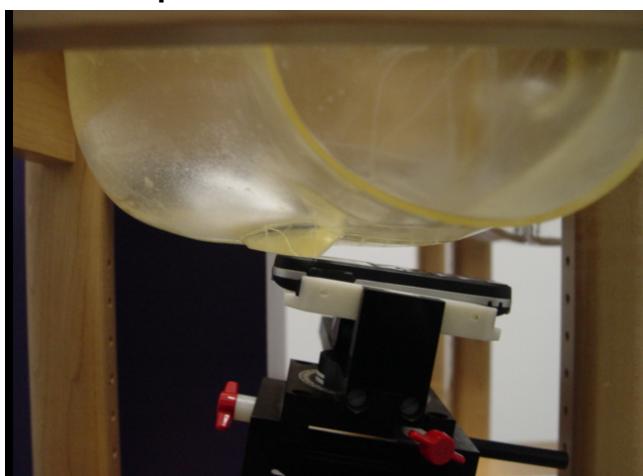
Left cheek position



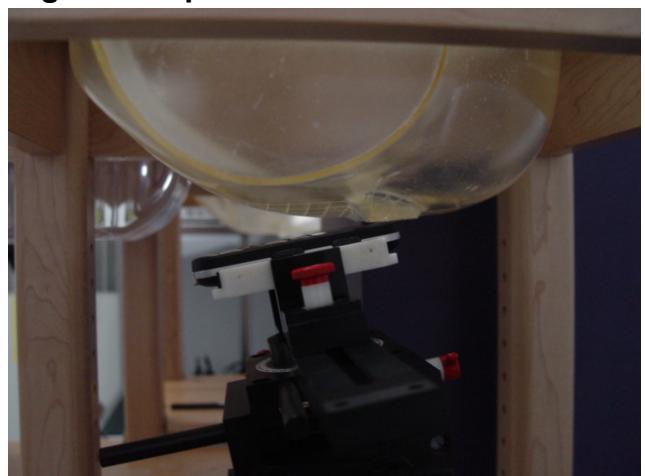
Right cheek position



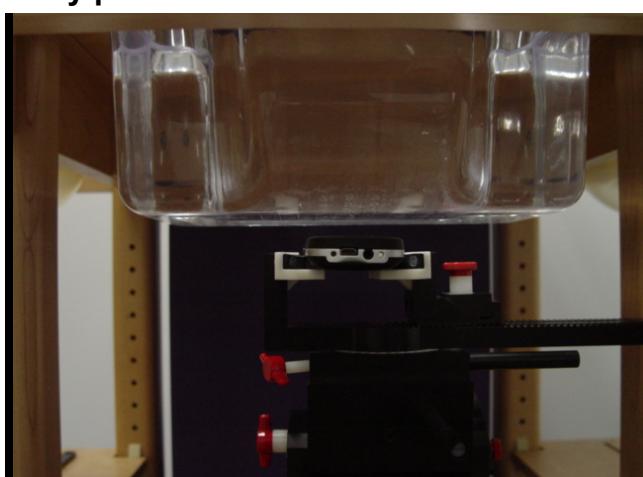
Left tilted position



Right tilted position



Body position face



Body position back





## 4. The Description of Test Procedure for FCC

### 4.1. Scan Procedure

First coarse scans were used for determination of the field distribution. Next a cube scan, 5x5x7 points covering a volume of 32x32x30mm was performed around the highest E-field value to determine the averaged SAR value. Drift was determined by measuring the same point at the start of the coarse scan and again at the end of the cube scan.

### 4.2. SAR Averaging Methods

The maximum SAR value was averaged over a cube of tissue using interpolation and extrapolation. The interpolation, extrapolation and maximum search routines within ALSAS-10-U are all based on the modified Quadratic Shepard's method (Robert J. Renka, "Multivariate Interpolation Of Lagre Sets Of Scattered Data", University of North Texas ACM Transactions on Mathematical Software, vol. 14, no. 2, June 1988, pp. 139-148).

The interpolation scheme combines a least-square fitted function method with a weighted average method. A trivariate 3-D / bivariate 2-D quadratic function is computed for each measurement point and fitted to neighbouring points by a least-square method. For the cube scan, inverse distance weighting is incorporated to fit distant points more accurately. The interpolating function is finally calculated as a weighted average of the quadratics. In the cube scan, the interpolation function is used to extrapolate the Peak SAR from the deepest measurement points to the inner surface of the phantom.

### 4.3. Data Storage

The ALSAS-10-U software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension .DA4. The post processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of erroneous parameter settings.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type (e.g., [V/m], [A/m] or [W/kg]). Some of these units are not available in certain situations or give meaningless results, e.g., a SAR-output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.



#### 4.4. Data Evaluation

The ALSAS-10-U post processing software 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	$Norm_i, a_{i0}, a_{i1}, a_{i2}$
	- Conversion factor	$ConvF_i$
	- Diode compression point	$dcp_i$
Device parameters:	- Frequency	$f$
	- Crest factor	$cf$
Media parameters:	- Conductivity	$\sigma$
	- Density	$\rho$

These parameters must be set correctly in the software. They can be found in the component documents or be imported into the software from the configuration files issued for the ALSAS-10-U 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:

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

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	(ALSAS-10-U parameter)
	$dcp_i$	= Diode compression point	(ALSAS-10-U parameter)

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

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$



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

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

$Norm_i$  = Sensor sensitivity of channel i (i = x, y, z)

$\mu\text{V}/(\text{V}/\text{m})^2$  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.

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

with  $SAR$  = 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  $\text{g}/\text{cm}^3$

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.

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

with  $P_{pwe}$  = Equivalent power density of a plane wave in  $\text{mW}/\text{cm}^2$

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

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



## 5. Measurement Uncertainty

### Exposure Assessment Measurement Uncertainty

Source of Uncertainty	Tolerance Value	Probability Distribution	Divisor	$c_i^1 (1-g)$	$c_i^1 (10-g)$	Standard Uncertainty (1-g) %	Standard Uncertainty (10-g) %
Measurement System							
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	$(1-cp)^{1/2}$	$(1-cp)^{1/2}$	1.5	1.5
Hemispherical Isotropy	10.9	rectangular	$\sqrt{3}$	$\sqrt{cp}$	$\sqrt{cp}$	4.4	4.4
Boundary Effect	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	rectangular	$\sqrt{3}$	1	1	2.7	2.7
Detection Limit	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Readout Electronics	1.0	normal	1	1	1	1.0	1.0
Response Time	0.8	rectangular	$\sqrt{3}$	1	1	0.5	0.5
Integration Time	1.7	rectangular	$\sqrt{3}$	1	1	1.0	1.0
RF Ambient Condition	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech.	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
Restriction							
Probe Positioning with respect to Phantom Shell	2.9	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Extrapolation and Integration	3.7	rectangular	$\sqrt{3}$	1	1	2.1	2.1
Test Sample Positioning	4.0	normal	1	1	1	4.0	4.0
Device Holder Uncertainty	2.0	normal	1	1	1	2.0	2.0
Drift of Output Power	0.6	rectangular	$\sqrt{3}$	1	1	0.3	0.3
Phantom and Setup							
Phantom Uncertainty(shape & thickness tolerance)	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
Liquid Conductivity(target)	5.0	rectangular	$\sqrt{3}$	0.7	0.5	2.0	1.4
Liquid Conductivity(meas.)	0.0	normal	1	0.7	0.5	0.0	0.0
Liquid Permittivity(target)	5.0	rectangular	$\sqrt{3}$	0.6	0.5	1.7	1.4
Liquid Permittivity(meas.)	2.4	normal	1	0.6	0.5	1.4	1.2
Combined Uncertainty		RSS				9.3	9.2
Combined Uncertainty (coverage factor=2)		Normal(k=2)				18.7	18.3



## 6. Reference

### 1. [ANSI/IEEE C95.1-1992]

Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. The Institute of Electrical and Electronics Engineers, Inc. (IEEE), 1992.

### 2. [ANSI/IEEE C95.3-1992]

Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave". The Institute of Electrical and Electronics Engineers, Inc. (IEEE), 1992.

### 3. [FCC Report and Order 96-326]

Federal Communications Commission, "Report and order: Guidelines for evaluating the environmental effects of radiofrequency radiation", Tech. Rep. FCC 96-326, 1996.

### 4. [FCC OET Bulletin 65]

Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. OET Bulletin 65 Edition 97-01, August 1997. Federal Communications Commission (FCC), Office of Engineering & Technology. (OET)

### 5. [FCC OET Bulletin 65 Supplement C]

Additional Information for Evaluating Compliance of Mobile and Portable Device with FCC Limits for Human Exposure to Radiofrequency Emissions. Supplement C (Edition 01-01) to OET Bulletin 65, June 2001. Federal Communications Commission (FCC), Office of Engineering & Technology. (OET)

### 6. [ALSAS-10-U 4]

Schmid & Partner Engineering AG: ALSAS-10-U 4 Manual, September 2005.

### 7. [IEEE 1528-2003]

IEEE Std 1528-2003: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques. 1528-2003, 19<sup>th</sup> December, 2003, The Institute of Electrical and Electronics Engineers, Inc. (IEEE).



## 7. APPENDIX A PHOTOGRAPHS of EUT





CERPASS TECHNOLOGY CORP.

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FCC ID: XM8AEGS40





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