

# SAR EVALUATION REPORT

For

## RCA Communications Systems

133 West Market Street Suite 227 Indianapolis IN USA

**FCC ID:XYH-MR240**

<b>Report Type:</b> Original report	<b>Product Type:</b> VHF Marine Two-Way Radio
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<b>Report Number:</b> RSZ150512550-20A	
<b>Report Date:</b> 2015-05-25	
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**Note:** This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp.

Attestation of Test Results				
<b>EUT Information</b>		<b>Company Name</b>		RCA Communications Systems
		<b>EUT Description</b>		VHF Marine Two-Way Radio
		<b>FCC ID</b>		XYH-MR240
		<b>Model Number</b>		Test Model: MR240 Mutiple Model: RS-36M
		<b>Test Date</b>		2015-05-20
<b>TX Frequency (MHz)</b>	<b>Modulation</b>	<b>Max. SAR Level(s) Reported (1g-SAR)</b>		<b>Limit (W/Kg)</b>
156.05-157.425	Analog	25kHz	Face up: 0.384 W/kg ( <i>corrected by Multiplying 50%.</i> ) Body-Back: 0.428 W/kg ( <i>corrected by Multiplying 50%.</i> )	8.0
<b>Applicable Standards</b>		<b>ANSI / IEEE C95.1: 2005</b> IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fileds,3 kHz to 300 GHz.		
		<b>ANSI / IEEE C95.3: 2002</b> IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to SuchFields,100 kHz—300 GHz.		
		<b>IEEE1528:2013</b> IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques		
		<b>KDB procedures</b> KDB 447498 D01 v05r02: Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies. KDB 865664 D01v01r03: SAR measurement 100 MHz to 6 GHz . KDB 643646D01 v01r01: SAR test Reduction Considerations for Occupational PTT Radios. KDB Inquiry: Tracking Number 316436 for SAR VHF system validation.		
<p><b>Note:</b> This wireless device has been shown to be capable of compliance for localized specific absorption rate SAR For Occupational /Controlled Exposure Environment limits specified in ANSI/IEEE Standards and have been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and RF exposure KDB procedures.</p> <p><b>The results and statements contained in this report pertain only to the device(s) evaluated.</b></p>				

## TABLE OF CONTENTS

<b>DOCUMENT REVISION HISTORY .....</b>	<b>4</b>
<b>EUT DESCRIPTION .....</b>	<b>5</b>
TECHNICAL SPECIFICATION .....	5
<b>REFERENCE, STANDARDS, AND GUIDELINES .....</b>	<b>6</b>
SAR LIMITS .....	7
<b>FACILITIES.....</b>	<b>8</b>
<b>DESCRIPTION OF TEST SYSTEM .....</b>	<b>9</b>
<b>EQUIPMENT LIST AND CALIBRATION .....</b>	<b>16</b>
EQUIPMENTS LIST & CALIBRATION INFORMATION .....	16
<b>SAR MEASUREMENT SYSTEM VALIDATION AND VERIFICATION.....</b>	<b>17</b>
LIQUID VERIFICATION .....	17
SYSTEM ACCURACY VALIDATION AND VERIFICATION .....	19
SAR SYSTEM VERIFICATION DATA .....	20
<b>EUT TEST STRATEGY AND METHODOLOGY .....</b>	<b>24</b>
TEST POSITIONS FOR DEVICE OPERATING NEXT TO A PERSON’S EAR.....	24
TEST POSITIONS FOR BODY-WORN AND OTHER CONFIGURATIONS.....	25
FOR EUT POSITIONING PROCEDURES .....	25
SAR EVALUATION PROCEDURE.....	26
TEST METHODOLOGY .....	26
<b>CONDUCTED OUTPUT POWER MEASUREMENT .....</b>	<b>27</b>
PROVISION APPLICABLE .....	27
TEST PROCEDURE .....	27
MAXIMUM OUTPUT POWER AMONG PRODUCTION UNITS .....	27
TEST RESULTS: .....	27
<b>SAR MEASUREMENT RESULTS .....</b>	<b>28</b>
SAR TEST DATA.....	28
TEST RESULT:.....	28
SAR PLOTS (SUMMARY OF THE HIGHEST SAR VALUES) .....	29
<b>APPENDIX A – MEASUREMENT UNCERTAINTY .....</b>	<b>31</b>
<b>APPENDIX B – PROBE CALIBRATION CERTIFICATES.....</b>	<b>33</b>
<b>APPENDIX C – LOOP CALIBRATION CERTIFICATES.....</b>	<b>44</b>
<b>APPENDIX D – EUT TEST POSITION PHOTOS .....</b>	<b>52</b>
LIQUID DEPTH $\geq$ 15CM .....	52
FACE-UP 2.5 CM SEPARATION TO FLAT PHANTOM .....	52
BODY-BACK 0.0 CM SEPARATION TO FLAT PHANTOM.....	53
EUT – FRONT VIEW.....	54
EUT – BACK VIEW .....	54
EUT–LEFT VIEW .....	55
EUT–RIGHT VIEW .....	55
EUT–TOP VIEW.....	56
EUT–BOTTOM VIEW .....	56
EUT–ANTENNA.....	57
EUT – BELT CLIP .....	57
<b>APPENDIX F – INFORMATIVE REFERENCES .....</b>	<b>58</b>
<b>PRODUCT SIMILARITY DECLARATION LETTER.....</b>	<b>59</b>

**DOCUMENT REVISION HISTORY**

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<b>Revision Number</b>	<b>Report Number</b>	<b>Description of Revision</b>	<b>Date of Revision</b>
0	RSZ150512550-20A	Original Report	2015-05-25

## EUT DESCRIPTION

This report has been prepared on behalf of RCA Communications Systems and their product and their product, FCC ID: XYH-MR240, Model: MR240 or the EUT (Equipment Under Test) as referred to in the rest of this report. The EUT is a VHF Marine Two-Way Radio.

**\*Note:** This series products model: MR240 and RS-36M, we select model: MR240 to test, there is no electrical change has been made to the equipment, please refer to the product similarity letter.

### Technical Specification

<b>Product Type</b>	Portable
<b>Exposure Category:</b>	Occupational/Controlled Exposure
<b>Antenna Type(s):</b>	External Antenna
<b>Body-Worn Accessories:</b>	Belt Clip
<b>Face-Head Accessories:</b>	None
<b>Modulation Type:</b>	FM
<b>Frequency Band:</b>	156.05MHz-157.425MHz (TX)
<b>Conducted RF Power:</b>	35.94 dBm
<b>EUT Dimensions (L*W*H):</b>	140 mm (L) × 65 mm (W)× 41 mm (H)
<b>Power Source:</b>	3.7V Rechargeable Li-ION Battery
<b>Normal Operation:</b>	Face Up and Body-worn

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## REFERENCE, STANDARDS, AND GUIDELINES

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### **FCC:**

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

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

### **CE:**

The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 2 mW/g as recommended by EN62209-1 for an uncontrolled environment. According to the Standard, the device should be evaluated at maximum output power (radiated from the antenna) under "worst-case" conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

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

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

**SAR Limits**

FCC Limit (1g Tissue)

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	1.60	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

CE Limit (10g Tissue)

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

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

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

Occupational/Controlled environments Spatial Peak limit 8.0W/kg (FCC/IC) & 10 W/kg (CE) applied to the EUT.

## **FACILITIES**

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The test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect data is located at 6/F, the 3rd Phase of WanLi Industrial Building, Shi Hua Road, Fu Tian Free Trade Zone, Shenzhen, Guangdong, P.R. of China



## DESCRIPTION OF TEST SYSTEM

These measurements were performed with ALSAS 10 Universal Integrated SAR Measurement system from APREL Laboratories.

### ALSAS-10U System Description

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 modeling 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 available up-to 6 GHz in simulated tissue.

### Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm<sup>2</sup> step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

### Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the ALSAS-10U software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m<sup>3</sup> is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10mm, with the side length of the 10 g cube 21,5mm.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of 5x5x8 (8mmx8mmx5mm) providing a volume of 32mm<sup>3</sup> in the X & Y axis, and 35mm in the Z axis.



**ALSAS-10U Interpolation and Extrapolation Uncertainty**

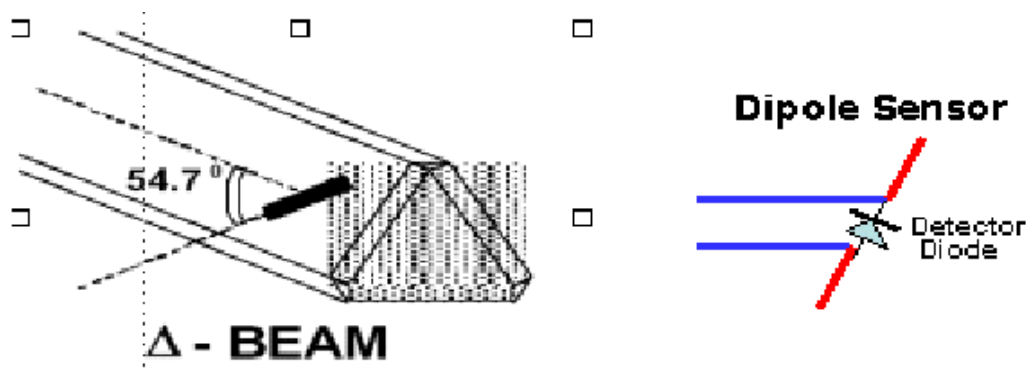
The overall uncertainty for the methodology and algorithms the used during the SAR calculation was evaluated using the data from IEEE 1528 based on the example f3 algorithm:

$$f_3(x, y, z) = A \frac{a^2}{\frac{a^2}{4} + x'^2 + y'^2} \cdot \left( e^{-\frac{2z}{a}} + \frac{a^2}{2(a + 2z)^2} \right)$$

**Isotropic E-Field Probe**

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

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.

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

## Isotropic E-Field Probe Specification

<b>Calibration Method</b>	Frequency Dependent Below 1 GHz Calibration in air performed in a TEM Cell Above 1 GHz Calibration in air performed in waveguide
<b>Sensitivity</b>	0.70 $\mu\text{V}/(\text{V}/\text{m})^2$ to 0.85 $\mu\text{V}/(\text{V}/\text{m})^2$
<b>Dynamic Range</b>	0.0005 W/kg to 100 W/kg
<b>Isotropic Response</b>	Better than 0.1 dB
<b>Diode Compression Point (DCP)</b>	Calibration for Specific Frequency
<b>Probe Tip Diameter</b>	< 2.9 mm
<b>Sensor Offset</b>	1.56 (+/- 0.02 mm)
<b>Probe Length</b>	289 mm
<b>Video Bandwidth</b>	@ 500 Hz: 1 dB @ 1.02 kHz: 3 dB
<b>Boundary Effect</b>	Less than 2.1% for distance greater than 0.58 mm
<b>Spatial Resolution</b>	The spatial resolution uncertainty is less than 1.5% for 4.9mm diameter probe. The spatial resolution uncertainty is less than 1.0% for 2.5mm diameter probe

## 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 detection during probe tilt (probe normalize) exercises, and utilizes a second stage emergency stop. The signal electronics are fed 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 connect to an isolated probe interconnect where the output stage of the probe is fed directly into the amplifier stage of the Daq-Paq.

## Daq-Paq (Analog to Digital Electronics)

ALSAS-10U incorporates a fully calibrated Daq-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 $\mu\text{V}$  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 an RS232 communications port. Probe linearity and duty cycle compensation is carried out within the main Daq-Paq module.

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

### Axis Articulated Robot

ALSAS-10U utilizes a six axis articulated robot, which is controlled using a Pentium based real-time movement controller. The movement kinematics engine utilizes proprietary (Thermo CRS) interpolation and extrapolation algorithms, which allow full freedom of movement for each of the six joints within the working envelope. Utilization of joint 6 allows for full probe rotation with a tolerance better than 0.05mm around the central axis.



<b>Robot/Controller Manufacturer</b>	Thermo CRS
<b>Number of Axis</b>	Six independently controlled axis
<b>Positioning Repeatability</b>	0.05 mm
<b>Controller Type</b>	Single phase Pentium based C500C
<b>Robot Reach</b>	710 mm
<b>Communication</b>	RS232 and LAN compatible

### ALSAS Universal Workstation

ALSAS Universal workstation allows for repeatability and fast adaptability. It allows users to do calibration, testing and measurements using different types of phantoms with one set up, which significantly speeds up the measurement process.

### Universal Device Positioner

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 indicator is included for the of aid cheek to tilt movements for head SAR analysis. Overall uncertainty for measurements have 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.

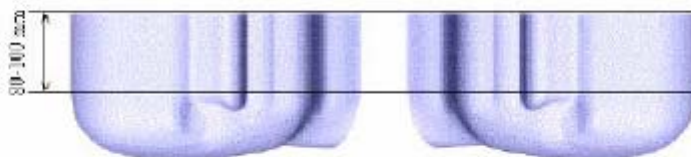


**Phantom Types**

The ALSAS-10U allows the integration of multiple phantom types. SAM Phantoms fully compliant with IEEE 1528, Universal Phantom, and Universal Flat.

**APREL SAM Phantoms**

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 30MHz 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.



### Tissue Dielectric Parameters for Head and Body Phantoms

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 described in Reference [12] and extrapolated according to the head parameters specified in P1528.

#### Simulated Tissue Composition

Ingredients (% by weight)	Frequency (MHz)									
	150		450		835		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.35	46.2	38.56	51.16	41.45	52.4	54.9	40.4	62.7	73.2
Salt (Nacl)	5.15	3.00	3.95	1.49	1.45	1.4	0.18	0.5	0.5	0.04
Sugar	55.4	49.7	56.32	46.78	56.0	45.0	0.0	58.0	0.0	0.0
HEC	1	1	0.98	0.52	1.0	1.0	0.0	1.0	0.0	0.0
Bactericide	0.1	0.1	0.19	0.05	0.1	0.1	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	36.8	0.0
DGBE	0	0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	52.57	61.75	43.42	58.0	42.54	56.1	39.9	54.0	39.8	52.5
Conductivity (s/m)	0.76	0.79	0.85	0.83	0.91	0.95	1.42	1.45	1.88	1.78

#### Recommended Tissue Dielectric Parameters for Head and Body

Frequency (MHz)	Head Tissue		Body Tissue	
	$\epsilon_r$	$\sigma$ (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	35.3	5.27	48.2	6.00

## EQUIPMENT LIST AND CALIBRATION

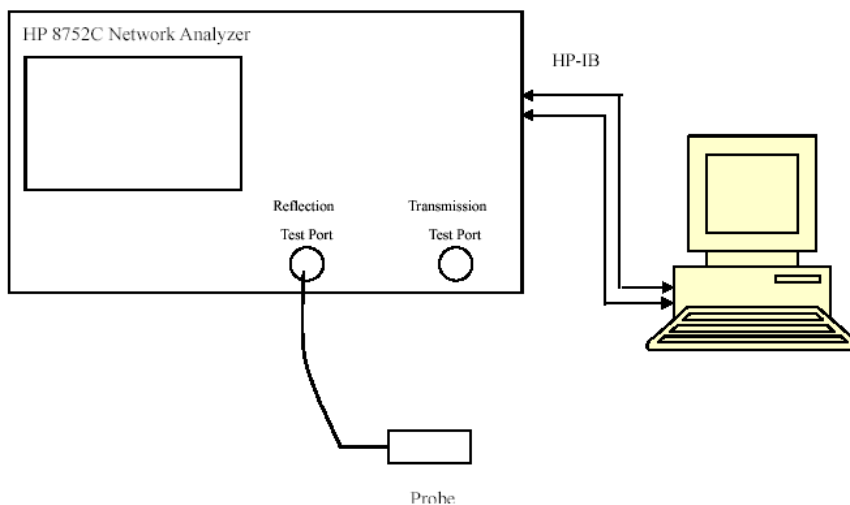
### Equipments List & Calibration Information

Equipment	Model	Calibration Date	S/N
CRS F3 robot	ALS-F3	N/A	RAF0805352
CRS F3 Software	ALS-F3-SW	N/A	N/A
CRS C500C controller	ALS-C500	N/A	RCF0805379
Probe mounting device & Boundary Detection Sensor System	ALS-PMDPS-3	N/A	120-00270
Universal Work Station	ALS-UWS	N/A	100-00157
Data Acquisition Package	ALS-DAQ-PAQ-3	2014-10-14	110-00212
Miniature E-Field Probe	E-020	2014-10-14	500-00283
Loop, 150 MHz	CLA150	2014-05-08	4004
Device holder/Positioner	ALS-H-E-SET-2	N/A	170-00510
Left ear SAM phantom	ALS-P-SAM-L	N/A	130-00311
Right ear SAM phantom	ALS-P-SAM-R	N/A	140-00359
UniPhantom	ALS-UM-FLAT	N/A	153-00104
Simulated Tissue 150 MHz Head	ALS-TS-150-H	Each Time	250-01302
Simulated Tissue 150 MHz Body	ALS-TS-150-B	Each Time	250-01304
Dielectric probe kit	HP85070B	2014-06-13	N/A
Power Amplifier	5S1G4	N/A	71377
Attenuator	3dB	2014-05-08	5402
Network analyzer	8752C	2014-06-03	3410A02356
Synthesized Sweeper	HP 8341B	2014-06-03	2624A00116
Directional couple	DC6180A	2014-06-13	0325849
EMI Test Receiver	ESCI	2014-06-13	101746



## SAR MEASUREMENT SYSTEM VALIDATION AND VERIFICATION

### Liquid Verification



Liquid Verification Setup Block Diagram

### Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
156.050	Head	50.29	0.78	52.30	0.76	-3.843	2.632	±5
	Body	61.37	0.82	61.90	0.80	-0.856	2.500	±5
156.800	Head	50.13	0.78	52.30	0.76	-4.149	2.632	±5
	Body	61.26	0.81	61.90	0.80	-1.034	1.250	±5
157.425	Head	50.01	0.77	52.30	0.76	-4.379	1.316	±5
	Body	60.20	0.81	61.90	0.80	-2.746	1.250	±5

\*Liquid Verification was performed on 2015-05-20

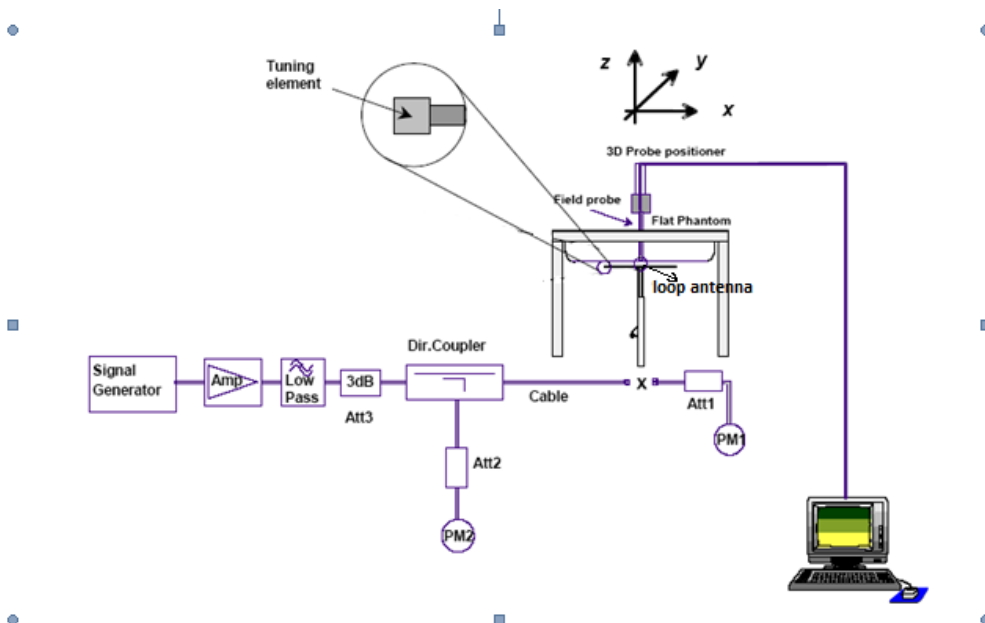
Please refer to the following tables.

150MHz Head			150MHz Body		
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''
136.00	51.6870	101.2296	136.00	61.9534	105.1636
136.76	51.8097	100.1899	136.76	62.7386	105.4333
137.52	51.8152	100.1343	137.52	62.7562	104.8253
138.28	52.0141	99.2517	138.28	62.5930	104.7443
139.04	51.5115	99.0109	139.04	61.5720	104.1808
139.80	51.2669	98.8829	139.80	62.5221	103.7365
140.56	51.3580	98.1300	140.56	62.2016	102.3325
141.32	51.3112	97.1792	141.32	63.1532	102.1121
142.08	51.1286	97.4908	142.08	62.4480	102.3600
142.84	51.1318	97.0311	142.84	61.0728	101.6797
143.60	50.9348	96.4748	143.60	62.9249	101.2860
144.36	50.9236	96.0561	144.36	62.8613	100.1572
145.12	50.6735	95.6444	145.12	61.5863	100.3770
145.88	50.5470	95.7214	145.88	62.8960	99.7419
146.64	50.5744	95.1133	146.64	62.1780	99.7422
147.40	50.5496	94.6557	147.40	62.6174	98.6143
148.16	50.6756	94.2401	148.16	61.5349	98.6910
148.92	50.4693	93.2625	148.92	60.7596	97.5790
149.68	50.4985	93.3746	149.68	60.6376	97.3055
150.44	50.7061	92.5275	150.44	62.3585	96.9200
151.20	50.5688	92.2870	151.20	62.0520	95.8864
151.96	50.5532	91.5043	151.96	61.6852	95.5911
152.72	50.5637	91.0978	152.72	60.7835	95.9820
153.48	50.5059	91.8585	153.48	62.1741	95.5239
154.24	50.5665	91.5972	154.24	60.8410	94.4973
155.00	50.4294	89.8447	155.00	60.7458	93.7393
155.76	50.3195	89.0645	155.76	62.4348	93.2878
156.52	50.2108	90.3281	156.52	61.3652	94.1393
157.28	49.7639	89.8026	157.28	61.2351	92.2059
158.04	50.3504	88.5015	158.04	60.2097	92.4248
158.80	50.3400	89.6011	158.80	61.6008	91.6126
159.56	50.4991	87.2961	159.56	60.5026	92.4076
160.32	50.4997	87.6288	160.32	61.3953	90.5846
161.08	50.6874	87.6833	161.08	61.4070	91.0582
161.84	50.6842	87.2747	161.84	60.1975	90.2365
162.60	50.6606	86.3601	162.60	61.9053	88.5252
163.36	50.9623	86.9916	163.36	61.6460	90.3178
164.12	50.4913	85.8160	164.12	60.8360	89.5849
164.88	50.6293	85.6328	164.88	62.0619	90.1664
165.64	50.7414	85.3385	165.64	60.6181	89.6502
166.40	50.5965	84.9833	166.40	61.4536	88.5245
167.16	50.3535	84.0509	167.16	59.9410	87.0722
167.92	50.2981	85.1566	167.92	62.6370	87.4729
168.68	50.5468	84.5667	168.68	60.0392	88.1395
169.44	50.7694	84.0890	169.44	60.3451	86.4161
170.20	50.8995	83.1983	170.20	60.9656	86.5600
170.96	50.7384	83.4959	170.96	60.3833	87.4435
171.72	50.9337	83.4476	171.72	60.9338	85.8693
172.48	50.8335	82.8875	172.48	60.3003	86.4191
173.24	51.1649	81.5455	173.24	60.7286	85.2882
174.00	51.0176	81.7809	174.00	61.1614	85.9087

### System Accuracy Validation and Verification

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

### System Verification Setup Block Diagram



### Probe and Loop antenna List and Detail

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
APREL	Probe	ALS-E-020	500-00283	2014-10-14	2015-10-13
Speag	Loop antenna(150MHz)	CLA150	4004	2014-05-08	2017-05-07

### System Validation

Date	Probe Calibration Point(MHz)		Measured Tissue Parameters		Validation		
			$\epsilon_r$	$\sigma$ (S/m)	Sensitivity	Linearity	Isotropy
2014-11-25	150	Head	51.08	0.77	Pass	Pass	Pass
		Body	61.27	0.79	Pass	Pass	Pass

### System Accuracy Check Results

Date	Frequency (MHz)	Liquid Type	Measured SAR (W/Kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2015-05-20	150	Head	1g	3.403	3.750	-9.253	$\pm 10$
		Body	1g	3.491	3.810	-8.373	$\pm 10$

\*All SAR values are normalized to 1 Watt forward power.

**SAR SYSTEM VERIFICATION DATA****Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)****System Performance Check 150 MHz Head Liquid****Loop150 MHz; Type: CLA150; S/N:4004**

## Product Data

Device Name : Loop 150 MHz  
Serial No. : 4004  
Type : Loop  
Model : CLA150  
Frequency Band : 150  
Max. Transmit Pwr : 1 W  
Drift Time : 3 min(s)  
Power Drift-Start : 3.025 W/kg  
Power Drift-Finish : 3.102 W/kg  
Power Drift (%) : 2.237

## Phantom Data

Name : APREL-Uni  
Type : Uni-Phantom  
Serial No. : System Default  
Location : Center  
Description : Default  
Phantom Data

## Tissue Data

Type : Head  
Serial No. : 250-01302  
Frequency : 150.00MHz  
Last Calib. Date : 20-May-2015  
Temperature : 20.00 °C  
Ambient Temp. : 21.00 °C  
Humidity : 56.00 RH%  
Epsilon : 50.68 F/m  
Sigma : 0.77 S/m  
Density : 1000.00 kg/cu. m

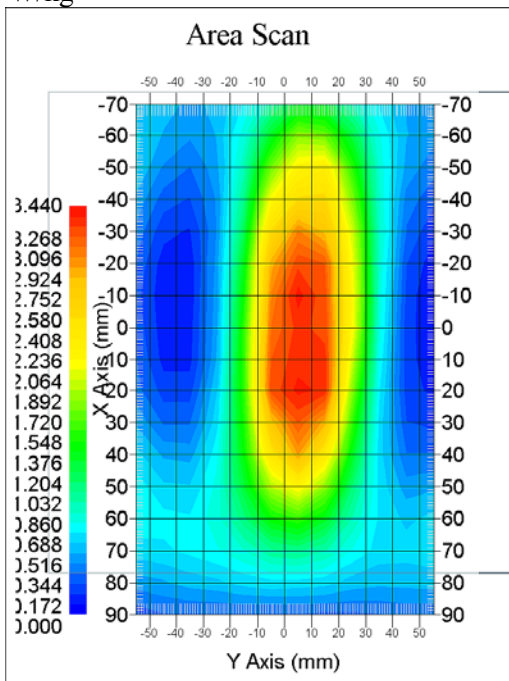
## Probe Data

Name : E-Field  
Model : E-020  
Type : E-Field Triangle  
Serial No. : 500-00283  
Last Calib. Date : 14-Oct-2014  
Frequency Band : 150  
Duty Cycle Factor : 1  
Conversion Factor : 6.0  
Probe Sensitivity : 1.20 1.20 1.20  $\mu\text{V}/(\text{V}/\text{m})^2$   
Compression Point : 95.00 mV  
Offset : 1.56 mm

## Measurement Data

Crest Factor : 1  
Scan Type : Complete  
Tissue Temp. : 21.00 °C  
Ambient Temp. : 21.00 °C  
Area Scan : 8x10x1 : Measurement x=10mm, y=10mm, z=4mm  
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 3.403 W/kg  
10 gram SAR value : 2.527 W/kg  
Area Scan Peak SAR : 3.431 W/kg  
Zoom Scan Peak SAR : 5.110 W/kg



150 MHz System Verification with Head Tissue

**Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)****System Performance Check 150 MHz Body Liquid****Loop 150 MHz; Type: CLA150; S/N: 4004**

## Product Data

Device Name : Loop 150 MHz  
Serial No. : 4004  
Type : Loop  
Model : CAL150  
Frequency Band : 150  
Max. Transmit Pwr : 1 W  
Drift Time : 3 min(s)  
Power Drift-Start : 3.162 W/kg  
Power Drift-Finish : 3.136 W/kg  
Power Drift (%) : -0.892

## Phantom Data

Name : APREL-Uni  
Type : Uni-Phantom  
Serial No. : System Default  
Location : Center  
Description : Default  
Phantom Data

## Tissue Data

Type : Body  
Serial No. : 250-01304  
Frequency : 150.00MHz  
Last Calib. Date : 20-May-2015  
Temperature : 20.00 °C  
Ambient Temp. : 21.00 °C  
Humidity : 56.00 RH%  
Epsilon : 60.70 F/m  
Sigma : 0.81 S/m  
Density : 1000.00 kg/cu. m

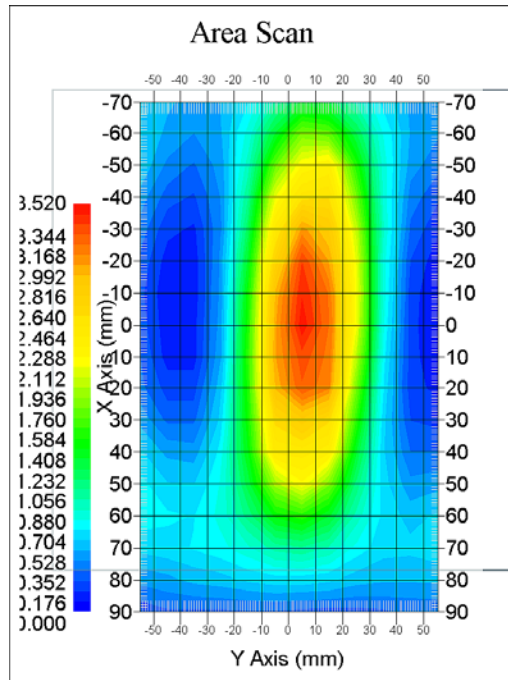
## Probe Data

Name : E-Field  
Model : E-020  
Type : E-Field Triangle  
Serial No. : 500-00283  
Last Calib. Date : 14-Oct-2014  
Frequency Band : 150  
Duty Cycle Factor : 1  
Conversion Factor : 6.0  
Probe Sensitivity : 1.20 1.20 1.20  $\mu\text{V}/(\text{V}/\text{m})^2$   
Compression Point : 95.00 mV  
Offset : 1.56 mm

## Measurement Data

Crest Factor : 1  
Scan Type : Complete  
Tissue Temp. : 21.00 °C  
Ambient Temp. : 21.00 °C  
Area Scan : 8x10x1 : Measurement x=10mm, y=10mm, z=4mm  
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 3.491 W/kg  
 10 gram SAR value : 2.572 W/kg  
 Area Scan Peak SAR : 3.505 W/kg  
 Zoom Scan Peak SAR : 5.308 W/kg



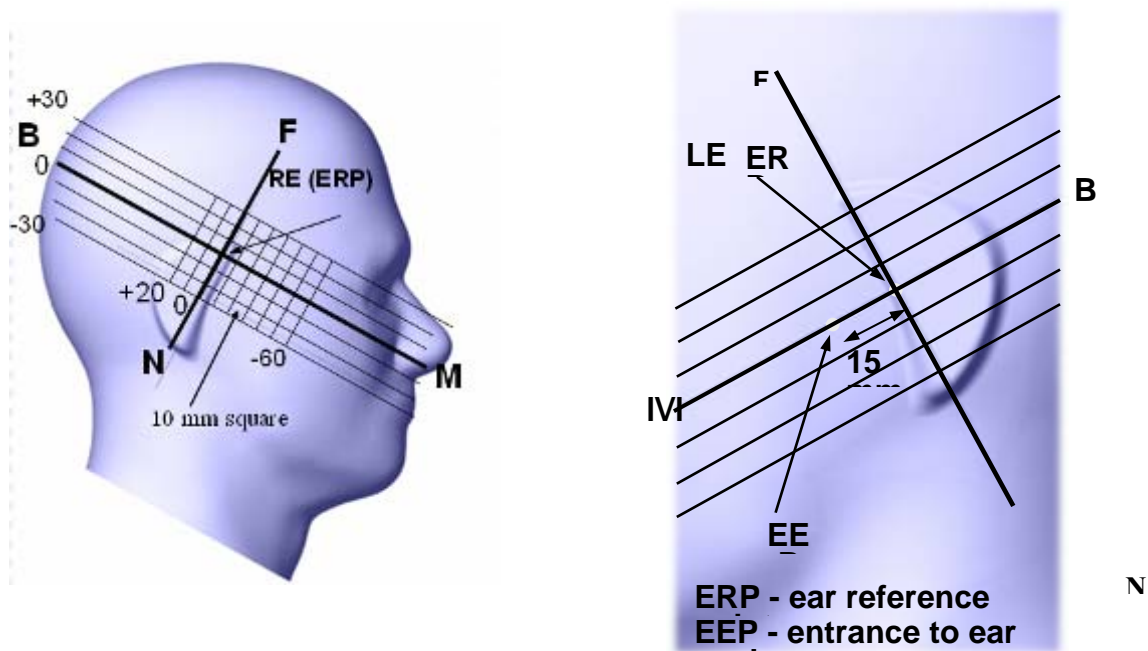
**150 MHz System Verification with Body Tissue**

## EUT TEST STRATEGY AND METHODOLOGY

### Test Positions for Device Operating Next to a Person’s Ear

This category includes most wireless handsets with fixed, retractable or internal antennas located toward the top half of the device, with or without a foldout, sliding or similar keypad cover. The handset should have its earpiece located within the upper ¼ of the device, either along the centerline or off-centered, as perceived by its users. This type of handset should be positioned in a normal operating position with the “test device reference point” located along the “vertical centerline” on the front of the device aligned to the “ear reference point”. The “test device reference point” should be located at the same level as the center of the earpiece region. The “vertical centerline” should bisect the front surface of the handset at its top and bottom edges. A “ear reference point” is located on the outer surface of the head phantom on each ear spacer. It is located 1.5 cm above the center of the ear canal entrance in the “phantom reference plane” defined by the three lines joining the center of each “ear reference point” (left and right) and the tip of the mouth.

A handset should be initially positioned with the earpiece region pressed against the ear spacer of a head phantom. For the SCC-34/SC-2 head phantom, the device should be positioned parallel to the “N-F” line defined along the base of the ear spacer that contains the “ear reference point”. For interim head phantoms, the device should be positioned parallel to the cheek for maximum RF energy coupling. The “test device reference point” is aligned to the “ear reference point” on the head phantom and the “vertical centerline” is aligned to the “phantom reference plane”. This is called the “initial ear position”. While maintaining these three alignments, the body of the handset is gradually adjusted to each of the following positions for evaluating SAR:





## Test positions for body-worn and other configurations

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations. Devices with a headset output should be tested with a headset connected to the device. When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., the same metallic belt-clip used with different holsters with no other metallic components), only the accessory that dictates the closest spacing to the body must be tested.

Body-worn accessories may not always be supplied or available as options for some devices that are intended to be authorized for body-worn use. A separation distance of 1.5 cm between the back of the device and a flat phantom is recommended for testing body-worn SAR compliance under such circumstances. Other separation distances may be used, but they should not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

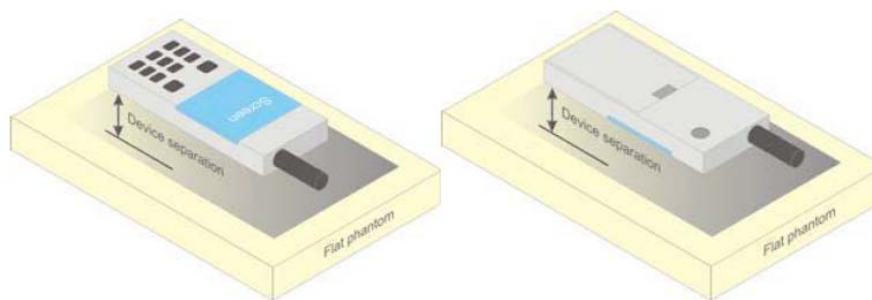


Figure 5 – Test positions for body-worn devices

## For EUT Positioning Procedures

The EUT is a portable device operational at the body and face. The intended operating positions are "at the face" with the EUT at least 2.5cm from the mouth, and "at the body" by means of the offered body worn accessories. Body worn audio and PTT operation is accomplished by means of optional remote accessories that are connected to the radio.

### Body

The EUT was positioned in normal use configuration against the phantom with the offered body worn accessory with the offered audio accessories as applicable

### Head

Not applicable

### Face

The EUT was positioned with its' front side separated 2.5cm from the phantom

## SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or EUT and the horizontal grid spacing was 10 mm x 10 mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 35 mm x 35 mm x 35 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

- 1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
- 2) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the "Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the averages.

All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

## Test methodology

IEEE1528:2013  
KDB 447498 D01 v05r02  
KDB 865664 D01 v01r03  
KDB 643646 D01 v01r01  
KDB Inquiry: Tracking Number 316436

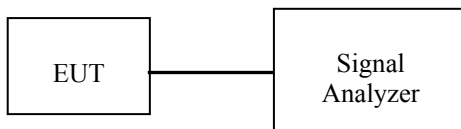
## CONDUCTED OUTPUT POWER MEASUREMENT

### Provision Applicable

The measured peak output power should be greater and within 5% than EMI measurement.

### Test Procedure

The RF output of the transmitter was connected to the input of the Signal Analyzer through sufficient attenuation.



### Maximum Output Power among production units

Max. tune-up tolerance power limit for Production Unit (dBm)	
PTT/Mode	TX Frequency(156.05-157.425)MHz
Analog-25K	37.00

### Test Results:

Mode	Frequency Spacing (kHz)	Frequency (MHz)	Output(dBm)	Output Power(W)	Power level
Analog	25	156.050	35.83	3.828	High
		156.800	35.94	3.926	High
		157.425	35.87	3.864	High

## SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

### SAR Test Data

#### Environmental Conditions

Temperature:	21 °C
Relative Humidity:	50%
ATM Pressure:	1002 mbar

\* Testing was performed by Terry XiaHou on 2015-05-20

### Test Result:

#### Analog (Modulation FM; Channel Spacing 25 kHz):

Frequency (MHz)	Power Drift (%)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1 g SAR Value(W/Kg)				
				Scaled Factor	Meas. SAR	Scaled SAR	50%	Plot
Face up (2.5cm)								
156.050	-1.382	35.83	37.00	1.309	0.533	0.698	0.349	/
156.800	0.752	35.94	37.00	1.276	0.601	0.767	<b>0.384</b>	<b>1#</b>
157.425	-2.573	35.87	37.00	1.297	0.570	0.739	0.370	/
Body-Back with Belt Clip(0.0cm)								
156.050	2.539	35.83	37.00	1.309	0.625	0.818	0.409	/
156.800	-1.106	35.94	37.00	1.276	0.671	0.856	<b>0.428</b>	<b>2#</b>
157.425	-0.941	35.87	37.00	1.297	0.619	0.803	0.401	/

#### Note:

1. When the 1-g SAR tested using the default battery and default accessories is  $\leq 3.5$ W/Kg (corrected by Multiplying 50% for FM mode), testing for other channels are optional.
2. For a analog PTT, only simplex communication technology was supported, so the SAR value need to be corrected by Multiplying 50%.
3. The frequencies points result in highest SAR value were selected to test.
4. Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios.
5. The whole antenna and radiating structures that may contribute to the measured SAR or influence the SAR distribution has been included in the area scan.

**SAR Plots (Summary of the Highest SAR Values)**

**Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**

**Face-Up 2.5cm (Analog 25k-156.800MHz)**

Measurement Data

Modulation mode : FM  
 Crest Factor : 1  
 Scan Type : Complete  
 Area Scan : 15x8x1: Measurement x=10mm, y=10mm, z=4mm  
 Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm  
 Power Drift-Start : 0.550 W/kg  
 Power Drift-Finish : 0.553 W/kg  
 Power Drift (%) : 0.752

Tissue Data

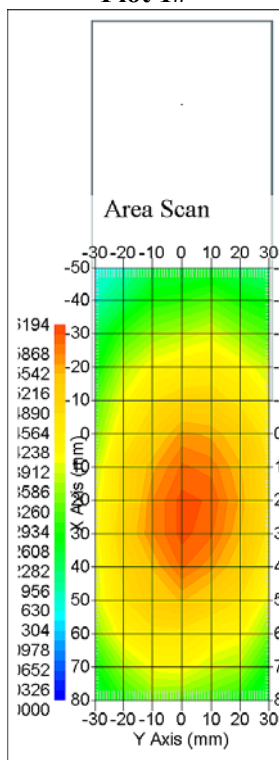
Type : Head  
 Frequency : 156.80MHz  
 Epsilon : 50.13 F/m  
 Sigma : 0.78 S/m  
 Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283  
 Frequency Band : 150  
 Duty Cycle Factor : 1  
 Conversion Factor : 6.0  
 Probe Sensitivity : 1.20 1.20 1.20  $\mu\text{V}/(\text{V}/\text{m})^2$   
 Compression Point : 95.00 mV  
 Offset : 1.56 mm

1 gram SAR value : 0.601 W/kg  
 10 gram SAR value : 0.460 W/kg  
 Area Scan Peak SAR : 0.613 W/kg  
 Zoom Scan Peak SAR : 1.027 W/kg

**Plot 1#**



**Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**

**Body-back 0.0cm (Analog 25k-156.80MHz)**

Measurement Data

Modulation mode : FM  
 Crest Factor : 1  
 Scan Type : Complete  
 Area Scan : 15x8x1: Measurement x=10mm, y=10mm, z=4mm  
 Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm  
 Power Drift-Start : 0.632 W/kg  
 Power Drift-Finish : 0.625 W/kg  
 Power Drift (%) : -1.106

Tissue Data

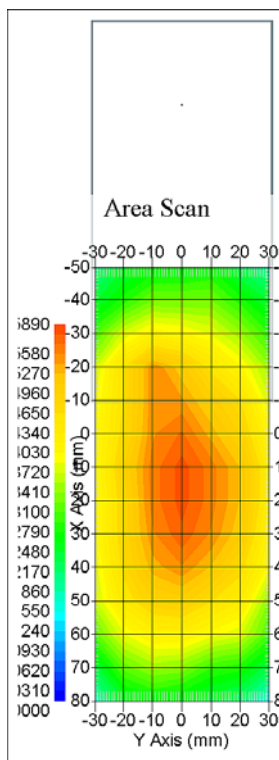
Type : Body  
 Frequency : 156.80 MHz  
 Epsilon : 61.26 F/m  
 Sigma : 0.81 S/m  
 Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283  
 Frequency Band : 150  
 Duty Cycle Factor : 1  
 Conversion Factor : 6.0  
 Probe Sensitivity : 1.20 1.20 1.20  $\mu\text{V}/(\text{V}/\text{m})^2$   
 Compression Point : 95.00 mV  
 Offset : 1.56 mm

1 gram SAR value : 0.671 W/kg  
 10 gram SAR value : 0.483 W/kg  
 Area Scan Peak SAR : 0.680 W/kg  
 Zoom Scan Peak SAR : 1.125 W/kg

**Plot 2#**



## APPENDIX A – MEASUREMENT UNCERTAINTY

According to **IEEE1528:2013**, the uncertainty budget has been determined for the Head SAR measurement system and is given in the following Table.

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) %
<b>Measurement System</b>							
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	$(1-cp)^{1/2}$	$(\frac{1-cp}{2})^1$	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 -Noise	0.6	rectangular	$\sqrt{3}$	1	1	0.3	0.3
RF Ambient Condition - Reflections	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech. Restrictions	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
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
<b>Test sample related</b>							
Test sample positioning	2.0	normal	1	1	1	2.0	2.0
Device Holder Uncertainty	4.0	normal	1	1	1	6.215	6.215
Drift of Output Power	5.0	rectangular	$\sqrt{3}$	1	1	2.67	2.67
<b>Phantom and Setup</b>							
Phantom Uncertainty	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
SAR correction in permittivity and conductivity	1.2	normal	1	1	0.85	1.2	1.0
Liquid conductivity measurement	5.0	normal	1	0.78	0.71	3.9	3.6
Liquid permittivity measurement	5.0	normal	1	0.25	0.29	1.3	1.5
conductivity—temperature	1.1	rectangular	$\sqrt{3}$	0.78	0.71	0.5	0.5
permittivity—temperature	1.3	rectangular	$\sqrt{3}$	0.23	0.23	0.2	0.2
Combined Uncertainty		RSS				10.78	10.55
Expanded uncertainty (coverage factor=2)		Normal(k=2)				21.56	21.10

According to **IEC62209-2:2010**, the uncertainty budget has been determined for the Body SAR measurement system and is given in the following Table.

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) %
<b>Measurement System</b>							
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	1	1	1.5	1.5
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 -Noise	0.6	rectangular	$\sqrt{3}$	1	1	0.3	0.3
RF Ambient Condition - Reflections	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech. Restrictions	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
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
<b>Test sample related</b>							
Test sample positioning	2.0	normal	1	1	1	2.0	2.0
Device Holder Uncertainty	4.0	normal	1	1	1	6.215	6.215
Drift of Output Power	5.0	rectangular	$\sqrt{3}$	1	1	2.67	2.67
<b>Phantom and Setup</b>							
Phantom Uncertainty	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
SAR correction in permittivity and conductivity	1.2	normal	1	1	0.84	1.2	1.0
Liquid conductivity measurement	5.0	normal	1	0.78	0.71	3.9	3.6
Liquid permittivity measurement	5.0	normal	1	0.23	0.26	1.3	1.5
conductivity—temperature	1.1	rectangular	$\sqrt{3}$	0.78	0.71	0.5	0.5
permittivity—temperature	1.3	rectangular	$\sqrt{3}$	0.23	0.26	0.2	0.2
Combined Uncertainty		RSS				9.58	9.49
Expanded uncertainty (coverage factor=2)		Normal(k=2)				19.16	18.98



## APPENDIX B – PROBE CALIBRATION CERTIFICATES

### NCL CALIBRATION LABORATORIES

Calibration File No.: PC-1598

Task No: BACL-5778

## CERTIFICATE OF CALIBRATION

It is certified that the equipment identified below has been calibrated in the  
NCL CALIBRATION LABORATORIES by qualified personnel following recognized  
procedures and using transfer standards traceable to NRC/NIST.

Equipment: Miniature Isotropic RF Probe

Record of Calibration

Head and Body

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 500-00283

Calibration Procedure: D01-032-E020-V2, D22-012-Tissue, D28-002-Dipole  
Project No: BACL-5745

Calibrated: 14<sup>th</sup> October 2014

Released on: 14<sup>th</sup> October 2014

This Calibration Certificate is Incomplete Unless Accompanied with the Calibration Results Summary

Released By: \_\_\_\_\_



Art Brennan, Quality Manager

### **NCL** CALIBRATION LABORATORIES

Suite 102, 303 Terry Fox Dr,  
OTTAWA, ONTARIO  
CANADA K2K 3J1

Division of APREL Lab.  
TEL: (613) 435-8300  
FAX: (613) 435-8306

## **NCL Calibration Laboratories**

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Division of APREL Inc.

### **Introduction**

This Calibration Report reproduces the results of the calibration performed in line with the references listed below. Calibration is performed using accepted methodologies as per the references listed below. Probes are calibrated for air, and tissue and the values reported are the results from the physical quantification of the probe through meteorological practices.

### **Calibration Method**

Probes are calibrated using the following methods.

<800 MHz

TEM Cell for sensitivity in air

Standard phantom using temperature transfer method for sensitivity in tissue

>800 MHz

Waveguide\* method to determine sensitivity in air and tissue

\*Waveguide is numerically (simulation) assessed to determine the field distribution and power

The boundary effect for the probe is assessed using a standard flat phantom where the probe output is compared against a numerically simulated series of data points

### **References**

- o IEEE Standard 1528:2013  
IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
- o EN 62209-1:2006  
Human Exposure to RF Fields from hand-held and body-mounted wireless communication devices - Human models, instrumentation, and procedures - Part 1: Procedure to measure the Specific Absorption Rate (SAR) for hand-held mobile wireless devices
- o IEC 62209-2:2010  
Human exposure to RF fields from hand-held and body-mounted wireless devices - Human models, instrumentation, and procedures - Part 2: specific absorption rate (SAR) for wireless communication devices (30 MHz - 6 GHz)
- o TP-D01-032-E020-V2 E-Field probe calibration procedure
- o D22-012-Tissue dielectric tissue calibration procedure
- o D28-002-Dipole procedure for validation of SAR system using a dipole
- o IEEE 1309 Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas, from 9kHz to 40GHz

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Page 2 of 10

This page has been reviewed for content and attested to on Page 2 of this document.

**NCL Calibration Laboratories**

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**Conditions**

Probe 500-00283 was a recalibration.

**Ambient Temperature of the Laboratory:** 22 °C +/- 1.5°C  
**Temperature of the Tissue:** 21 °C +/- 1.5°C  
**Relative Humidity:** < 60%

**Primary Measurement Standards**

Instrument	Serial Number	Cal due date
Tektronix USB Power Meter	11C940	May 14, 2015
Signal Generator HP 83640B	3844A00689	Feb 12, 2015

**Secondary Measurement Standards**

Network Analyzer Anritsu 37347C	002106	Feb. 20, 2015
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**Attestation**

The below named signatories have conducted the calibration and review of the data which is presented in this calibration report.

**We the undersigned attest that to the best of our knowledge the calibration of this subject has been accurately conducted and that all information contained within the results pages have been reviewed for accuracy.**



Art Brennan, Quality Manager



Dan Brooks, Test Engineer

Page 3 of 10

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**NCL Calibration Laboratories**

Division of APREL Inc.

**Probe Summary**

<b>Probe Type:</b>	E-Field Probe E020
<b>Serial Number:</b>	500-00283
<b>Frequency:</b>	As presented on page 5
<b>Sensor Offset:</b>	1.56
<b>Sensor Length:</b>	2.5
<b>Tip Enclosure:</b>	Composite*
<b>Tip Diameter:</b>	< 2.9 mm
<b>Tip Length:</b>	55 mm
<b>Total Length:</b>	289 mm

\*Resistive to recommended tissue recipes per IEEE-1528

**Sensitivity in Air**

<b>Channel X:</b>	1.2 $\mu\text{V}/(\text{V}/\text{m})^2$
<b>Channel Y:</b>	1.2 $\mu\text{V}/(\text{V}/\text{m})^2$
<b>Channel Z:</b>	1.2 $\mu\text{V}/(\text{V}/\text{m})^2$
<b>Diode Compression Point:</b>	95 mV

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Page 4 of 10

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**NCL Calibration Laboratories**

Division of APREL Inc.

Calibration for Tissue (Head H, Body B)

Frequency	Tissue Type	Measured Epsilon	Measured Sigma	Standard Uncertainty (%)	Calibration Frequency Range (MHz)	Conversion Factor
450 H	Head	43.59	0.86	3.5	±50	5.7
450 B	Body	56.74	0.94	3.5	±50	5.8
750 H	Head	42.98	0.92	3.5	±50	6.0
750 B	Body	43.05	0.93	3.5	±50	5.5
835 H	Head	43.42	0.94	3.5	±50	5.9
835 B	Body	55.77	1.01	3.5	±50	5.9
900 H	Head	41.87	1.06	3.5	±50	6.0
900 B	Body	55.62	1.05	3.5	±50	5.9
1450 H	Head	X	X	X	X	X
1450 B	Body	X	X	X	X	X
1500 H	Head	X	X	X	X	X
1500 B	Body	X	X	X	X	X
1640 H	Head	X	X	X	X	X
1640 B	Body	X	X	X	X	X
1750 H	Head	38.23	1.38	3.5	±75	5.4
1750 B	Body	52.86	1.54	3.5	±75	5.3
1800 H	Head	X	X	X	X	X
1800 B	Body	X	X	X	X	X
1900 H	Head	40.20	1.38	3.5	±75	4.8
1900 B	Body	52.63	1.46	3.5	±75	4.5
2000 H	Head	X	X	X	X	X
2000 B	Body	X	X	X	X	X
2100 H	Head	X	X	X	X	X
2100 B	Body	X	X	X	X	X
2300 H	Head	X	X	X	X	X
2300 B	Body	X	X	X	X	X
2450 H	Head	37.26	1.84	3.5	±75	4.9
2450 B	Body	53.61	1.9	3.5	±75	4.3
3000 H	Head	X	X	X	X	X
3000 B	Body	X	X	X	X	X
3600 H	Head	37.49	3.16	3.5	±100	4.5
3600 B	Body	49.94	3.86	3.5	±100	4.0
5250 H	Head	35.51	4.78	3.5	±100	3.0
5250 B	Body	47.54	5.11	3.5	±100	2.8
5600 H	Head	36.05	5.15	3.5	±100	2.8
5600 B	Body	46.49	5.72	3.5	±100	2.2
5800 H	Head	45.99	6.01	3.5	±100	3.2
5800 B	Body	35.6	5.37	3.5	±100	2.5

**NCL Calibration Laboratories**

Division of APREL Inc.

**Boundary Effect:**

Uncertainty resulting from the boundary effect is less than 2.1% for the distance between the tip of the probe and the tissue boundary, when less than 0.58mm.

**Spatial Resolution:**

The spatial resolution uncertainty is less than 1.5% for 4.9mm diameter probe.  
 The spatial resolution uncertainty is less than 1.0% for 2.5mm diameter probe.

**DAQ-PAQ Contribution**

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of 5 MΩ.

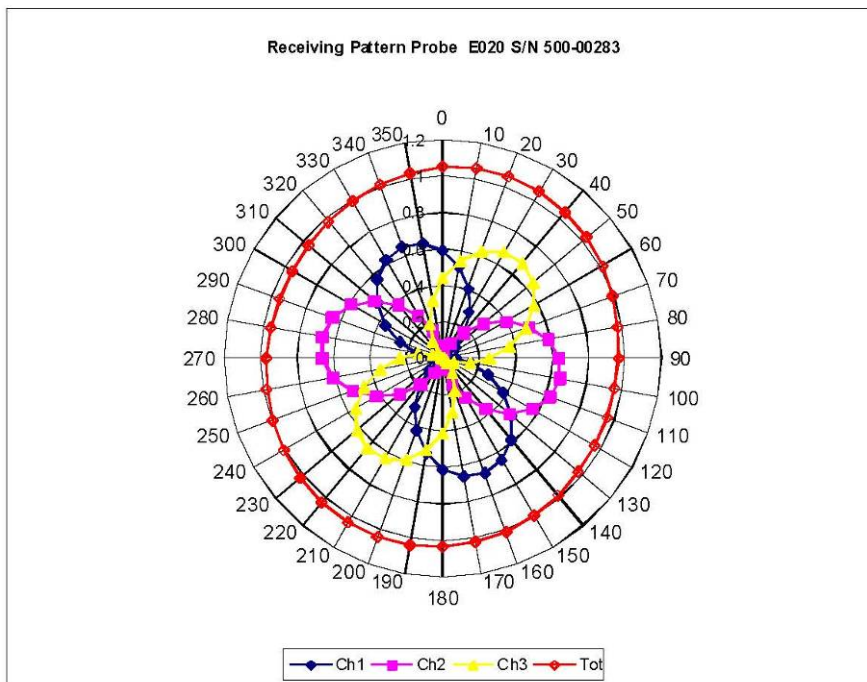
**Probe Calibration Uncertainty**

Uncertainty component	Tolerance (± %)	Probability distribution	Divisor	Standard uncertainty (± %)
Incident or forward power	2.5	R	√3	1.44
Reflected power	2	R	√3	1.15
Liquid conductivity measurement	1	R	√3	0.58
Liquid permittivity measurement	1	R	√3	0.58
Liquid conductivity deviation	1.5	R	√3	0.87
Liquid permittivity deviation	1.5	R	√3	0.87
Frequency deviation	2.25	R	√3	1.30
Field homogeneity	2.5	R	√3	1.44
Field-probe positioning	2.5	R	√3	1.44
Field-probe linearity	1.55	R	√3	0.89
<b>Combined standard uncertainty</b>		<b>RSS</b>		<b>3.50</b>

**NCL Calibration Laboratories**

Division of APREL Inc.

**Receiving Pattern Air**



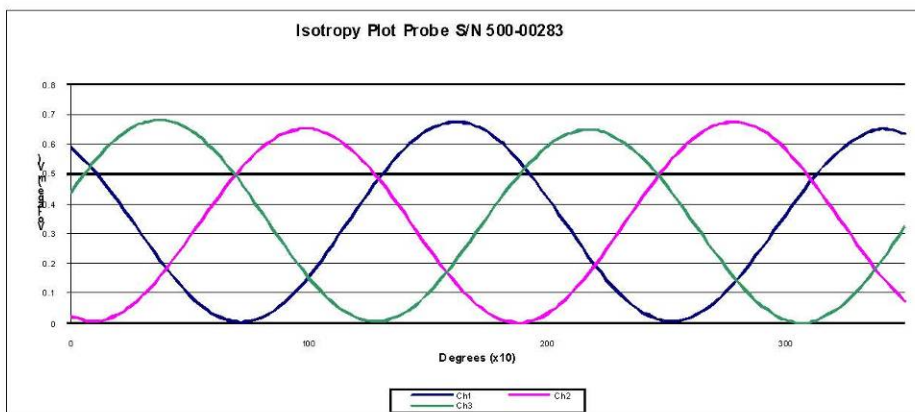
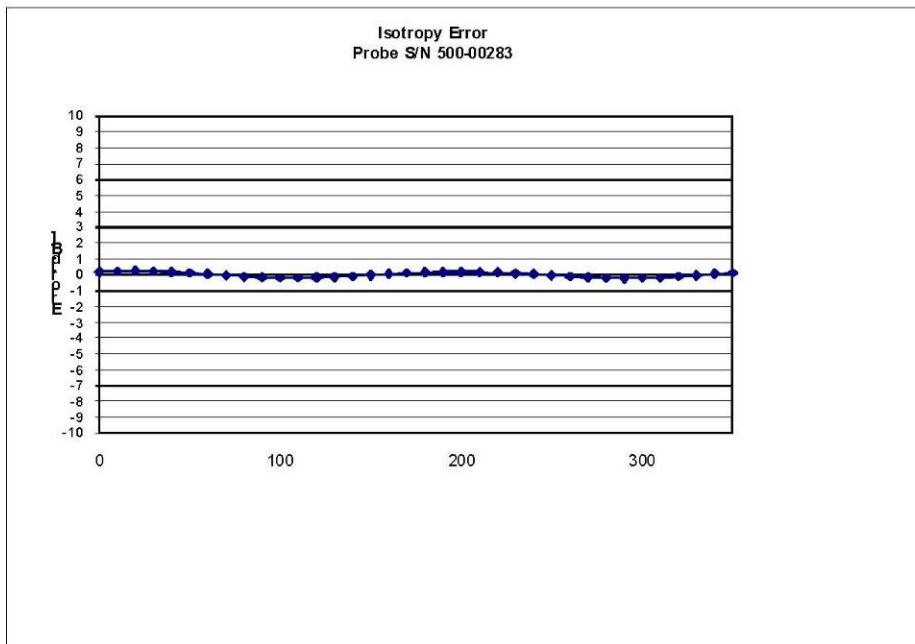
Page 7 of 10

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**NCL Calibration Laboratories**

Division of APREL Inc.

**Isotropy Error Air**



**Isotropicity Tissue:** 0.10 dB

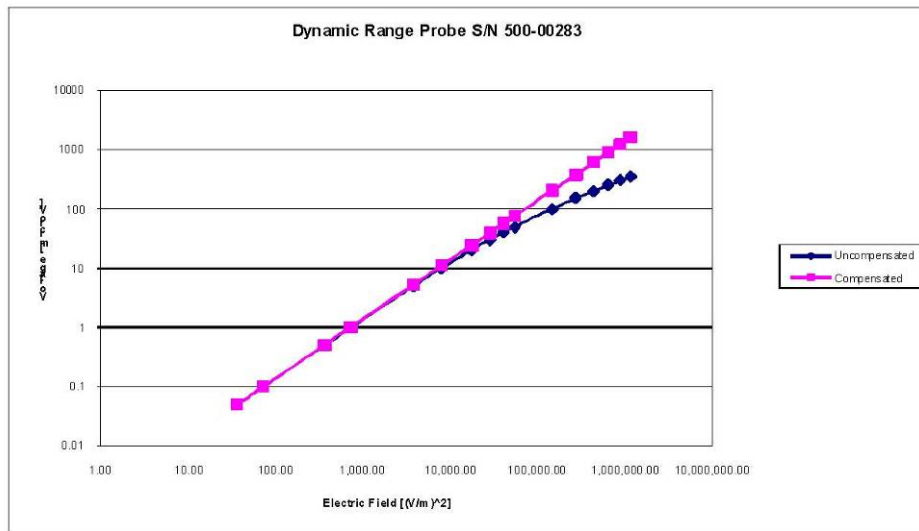
Page 8 of 10  
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**NCL Calibration Laboratories**

Division of APREL Inc.

**Dynamic Range**

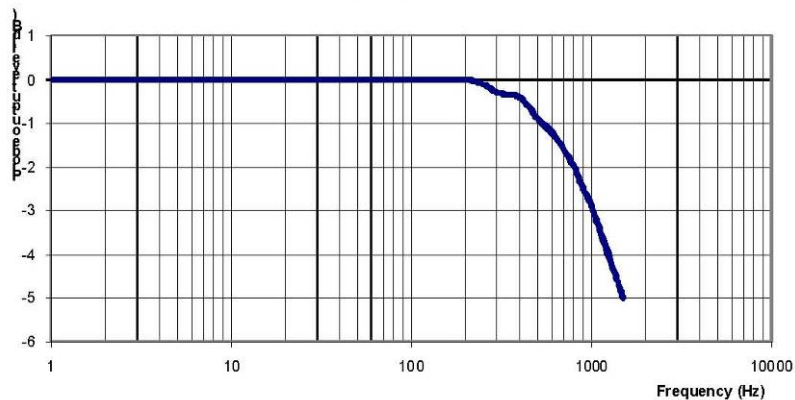


**NCL Calibration Laboratories**

Division of APREL Inc.

**Video Bandwidth**

**Probe Frequency Characteristics**



**Video Bandwidth at 500 Hz**                      1 dB  
**Video Bandwidth at 1.02 KHz:**                3 dB

**Test Equipment**

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2014.

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Page 10 of 10  
This page has been reviewed for content and attested to on Page 2 of this document.

**ANNEX**

**PROBE ALS-E020 S/N 500-00283 CALIBRATION**

**Conditions**

Ambient Temperature of the laboratory: 20 °C +/- 1.5°C  
 Temperature of the Tissue: 21 °C +/- 1.5°C  
 Relative Humidity: < 55%

Frequency	Tissue Type	Measured Epsilon	Measured Sigma	Standard Uncertainty (%)	Calibration Frequency Range (MHz)	Conversion Factor
150 H	Head	50.6	0.78	3.5	±50	6.0
150 B	Body	60.8	0.82	3.5	±50	6.0

**Probe Calibration Uncertainty**

Uncertainty component	Tolerance (± %)	Probability distribution	Divisor	Standard uncertainty (± %)
Incident or forward power	2.5	R	√3	1.44
Reflected power	2	R	√3	1.15
Liquid conductivity measurement	1	R	√3	0.58
Liquid permittivity measurement	1	R	√3	0.58
Liquid conductivity deviation	1.5	R	√3	0.87
Liquid permittivity deviation	1.5	R	√3	0.87
Frequency deviation	2.25	R	√3	1.30
Field homogeneity	2.5	R	√3	1.44
Field-probe positioning	2.5	R	√3	1.44
Field-probe linearity	1.55	R	√3	0.89
<b>Combined standard uncertainty</b>		RSS		3.50

# APPENDIX C – LOOP CALIBRATION CERTIFICATES

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



**S** Schweizerischer Kalibrierdienst  
**C** Service suisse d'étalonnage  
**S** Servizio svizzero di taratura  
**S** Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)  
The Swiss Accreditation Service is one of the signatories to the EA  
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 108**

Client **BACL**

Certificate No: **CLA150-4004\_May14**

## CALIBRATION CERTIFICATE

Object: **CLA150 - SN: 4004**

Calibration procedure(s): **QA CAL-15.v8  
Calibration procedure for system validation sources below 700 MHz**

Calibration date: **May 08, 2014**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	03-Apr-14 (No. 217-01911)	Apr-15
Power sensor E4412A	MY41498087	03-Apr-14 (No. 217-01911)	Apr-15
Reference 3 dB Attenuator	SN: S5054 (3c)	03-Apr-14 (No. 217-01915)	Apr-15
Reference 20 dB Attenuator	SN: S5058 (20k)	03-Apr-14 (No. 217-01918)	Apr-15
Type-N mismatch combination	SN: 5047.2 / 06327	03-Apr-14 (No. 217-01921)	Apr-15
Reference Probe EX3DV4	SN: 3877	06-Jan-14 (No. EX3-3877_Jan14)	Jan-15
DAE4	SN: 654	18-Jul-13 (No. DAE4-654_Jul13)	Jul-14

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
RF generator HP 8648C	US3642U01700	04-Aug-99 (in house check Apr-13)	In house check: Apr-16
Network Analyzer HP 8753E	US37390585 S4206	18-Oct-01 (in house check Oct-13)	In house check: Oct-14

	Name	Function	Signature
Calibrated by:	Israe El-Naouq	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: May 8, 2014

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

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



**S** Schweizerischer Kalibrierdienst  
**C** Service suisse d'étalonnage  
**S** Servizio svizzero di taratura  
**S** Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)  
The Swiss Accreditation Service is one of the signatories to the EA  
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 108**

#### Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

#### Calibration is Performed According to the Following Standards:

- IEC 62209-2, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2013
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

#### Additional Documentation:

- DASY4/5 System Handbook

#### Methods Applied and Interpretation of Parameters:

- Measurement Conditions:* Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:* The source is mounted in a touch configuration below the center marking of the flat phantom.
- Return Loss:* This parameter is measured with the source positioned under the liquid filled phantom (as described in the measurement condition clause). The Return Loss ensures low reflected power. No uncertainty required.
- SAR measured:* SAR measured at the stated antenna input power.
- SAR normalized:* SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:* The measured TSL parameters are used to calculate the nominal SAR result.

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

**Measurement Conditions**

DASY system configuration, as far as not given on page 1.

DASY Version	DASY5	V52.8.8
Extrapolation	Advanced Extrapolation	
Phantom	ELI4 Flat Phantom	Shell thickness: 2 ± 0.2 mm
EUT Positioning	Touch Position	
Zoom Scan Resolution	dx, dy, dz = 5.0 mm	
Frequency	150 MHz ± 1 MHz	

**Head TSL parameters**

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	52.3	0.76 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	49.9 ± 6 %	0.76 mho/m ± 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

**SAR result with Head TSL**

SAR averaged over 1 cm <sup>3</sup> (1 g) of Head TSL	Condition	
SAR measured	1 W input power	3.79 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	<b>3.75 W/kg ± 18.4 % (k=2)</b>

SAR averaged over 10 cm <sup>3</sup> (10 g) of Head TSL	condition	
SAR measured	1 W input power	2.51 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	<b>2.49 W/kg ± 18.0 % (k=2)</b>

**Body TSL parameters**

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	61.9	0.80 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	62.5 ± 6 %	0.80 mho/m ± 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

**SAR result with Body TSL**

SAR averaged over 1 cm <sup>3</sup> (1 g) of Body TSL	Condition	
SAR measured	1 W input power	3.80 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	<b>3.81 W/kg ± 18.4 % (k=2)</b>

SAR averaged over 10 cm <sup>3</sup> (10 g) of Body TSL	condition	
SAR measured	1 W input power	2.55 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	<b>2.55 W/kg ± 18.0 % (k=2)</b>

**Appendix****Antenna Parameters with Head TSL**

Impedance, transformed to feed point	45.5 $\Omega$ - 10.6 j $\Omega$
Return Loss	- 18.4 dB

**Antenna Parameters with Body TSL**

Impedance, transformed to feed point	46.0 $\Omega$ - 14.6 j $\Omega$
Return Loss	- 16.2 dB

**Additional EUT Data**

Manufactured by	SPEAG
Manufactured on	August 23, 2013

**DASY5 Validation Report for Head TSL**

Date: 08.05.2014

Test Laboratory: SPEAG, Zurich, Switzerland

**DUT: CLA150; Type: CLA150; Serial: CLA150 - SN: 4004**

Communication System: UID 0 - CW; Frequency: 150 MHz

Medium parameters used:  $f = 150 \text{ MHz}$ ;  $\sigma = 0.76 \text{ S/m}$ ;  $\epsilon_r = 49.9$ ;  $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2007)

DASY52 Configuration:

- Probe: EX3DV4 - SN3877; ConvF(11.76, 11.76, 11.76); Calibrated: 06.01.2014;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn654; Calibrated: 18.07.2013
- Phantom: ELI v4.0; Type: QDOVA001BB; Serial: TP:1003
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

**CLA Calibration for HSL-LF Tissue/CLA150, touch configuration, Pin=1W/Area Scan**

**(81x81x1):** Interpolated grid:  $dx=1.500 \text{ mm}$ ,  $dy=1.500 \text{ mm}$

Maximum value of SAR (interpolated) = 4.91 W/kg

**CLA Calibration for HSL-LF Tissue/CLA150, touch configuration, Pin=1W/Zoom Scan**

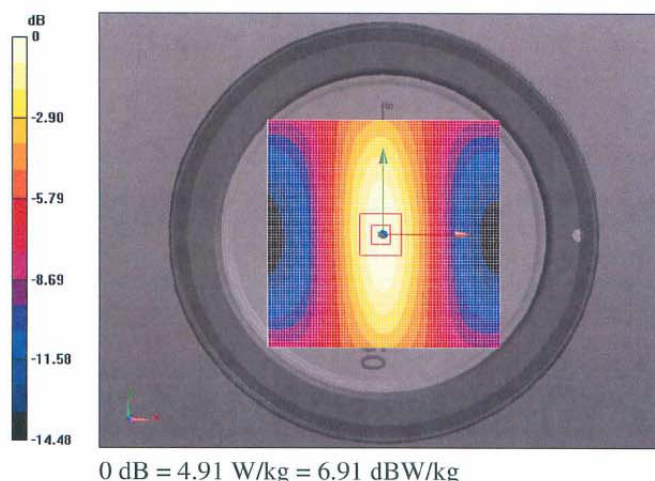
**(7x7x7)/Cube 0:** Measurement grid:  $dx=5\text{mm}$ ,  $dy=5\text{mm}$ ,  $dz=5\text{mm}$

Reference Value = 80.11 V/m; Power Drift = -0.05 dB

Peak SAR (extrapolated) = 6.11 W/kg

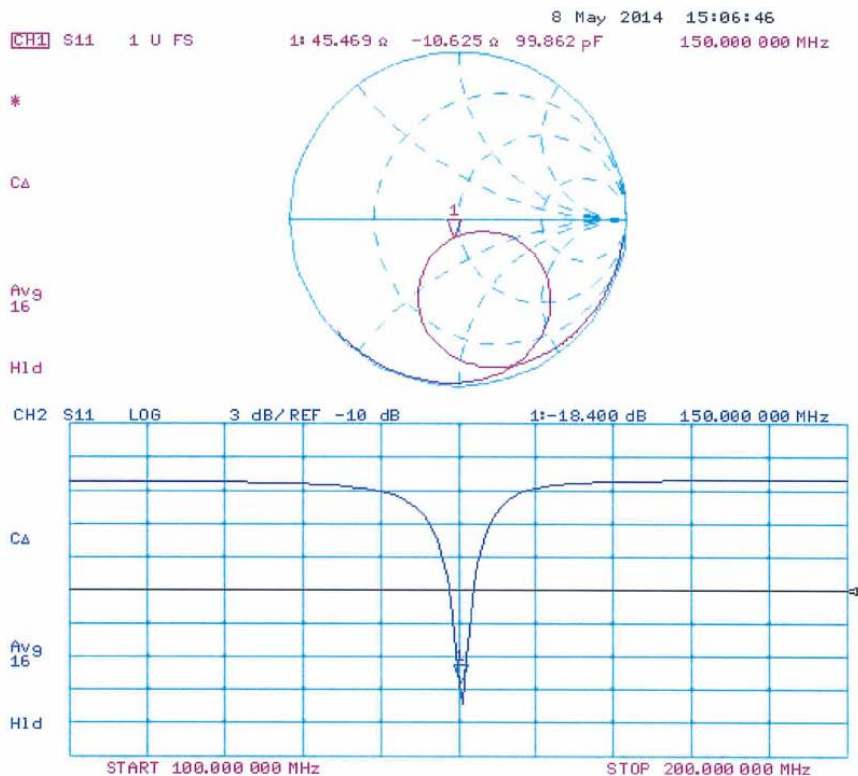
**SAR(1 g) = 3.79 W/kg; SAR(10 g) = 2.51 W/kg**

Maximum value of SAR (measured) = 4.89 W/kg





### Impedance Measurement Plot for Head TSL



**DASY5 Validation Report for Body TSL**

Date: 08.05.2014

Test Laboratory: SPEAG, Zurich, Switzerland

**DUT: CLA150; Type: CLA150; Serial: CLA150 - SN: 4004**

Communication System: UID 0 - CW; Frequency: 150 MHz

Medium parameters used:  $f = 150$  MHz;  $\sigma = 0.8$  S/m;  $\epsilon_r = 62.5$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2007)

DASY52 Configuration:

- Probe: EX3DV4 - SN3877; ConvF(11.45, 11.45, 11.45); Calibrated: 06.01.2014;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn654; Calibrated: 18.07.2013
- Phantom: ELI v4.0; Type: QDOVA001BB; Serial: TP:1003
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

**CLA Calibration for MSL-LF Tissue/CLA150, touch configuration, Pin=1W/Area Scan****(81x81x1):** Interpolated grid:  $dx=1.500$  mm,  $dy=1.500$  mm

Maximum value of SAR (interpolated) = 4.87 W/kg

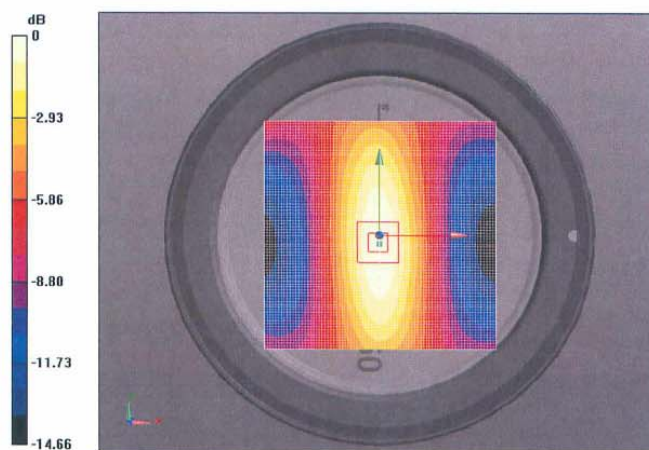
**CLA Calibration for MSL-LF Tissue/CLA150, touch configuration, Pin=1W/Zoom Scan****(7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 77.84 V/m; Power Drift = -0.03 dB

Peak SAR (extrapolated) = 6.05 W/kg

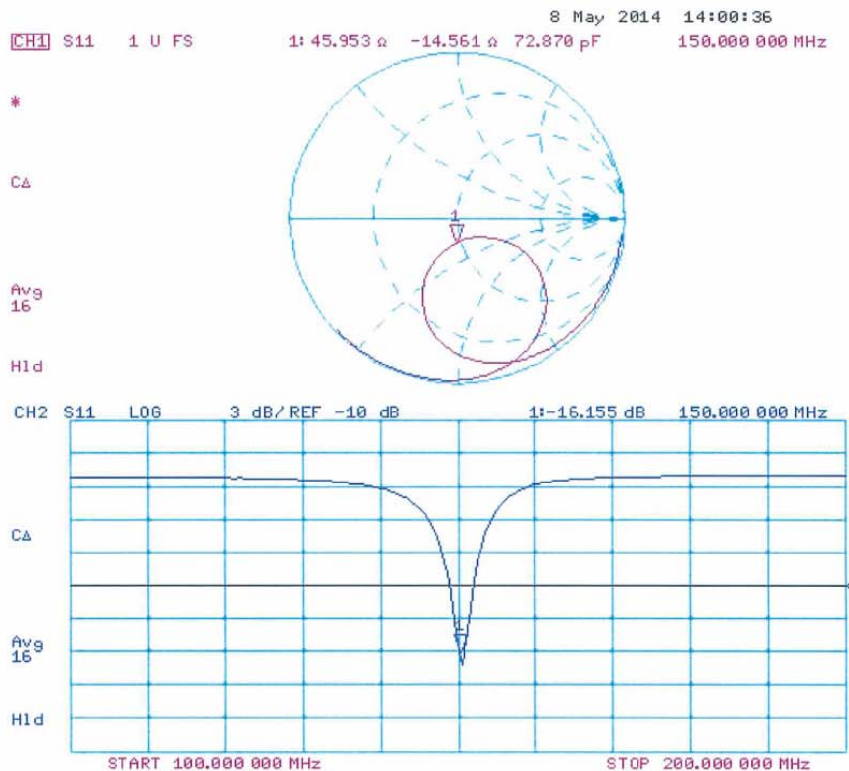
**SAR(1 g) = 3.8 W/kg; SAR(10 g) = 2.55 W/kg**

Maximum value of SAR (measured) = 4.88 W/kg



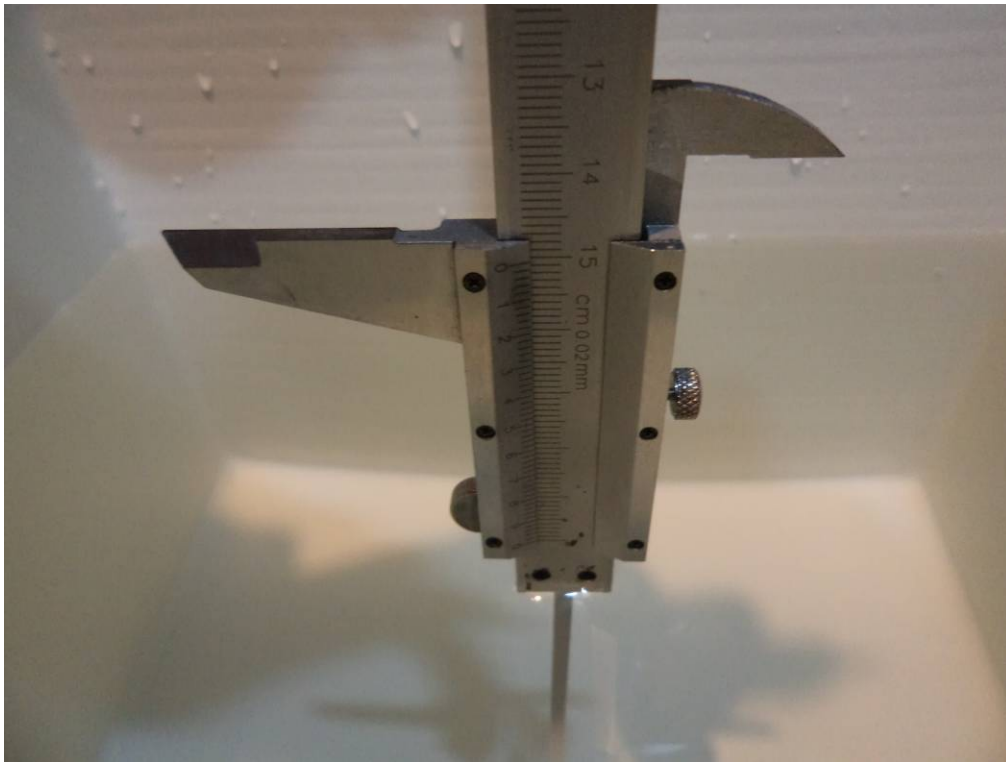
0 dB = 4.87 W/kg = 6.88 dBW/kg

### Impedance Measurement Plot for Body TSL

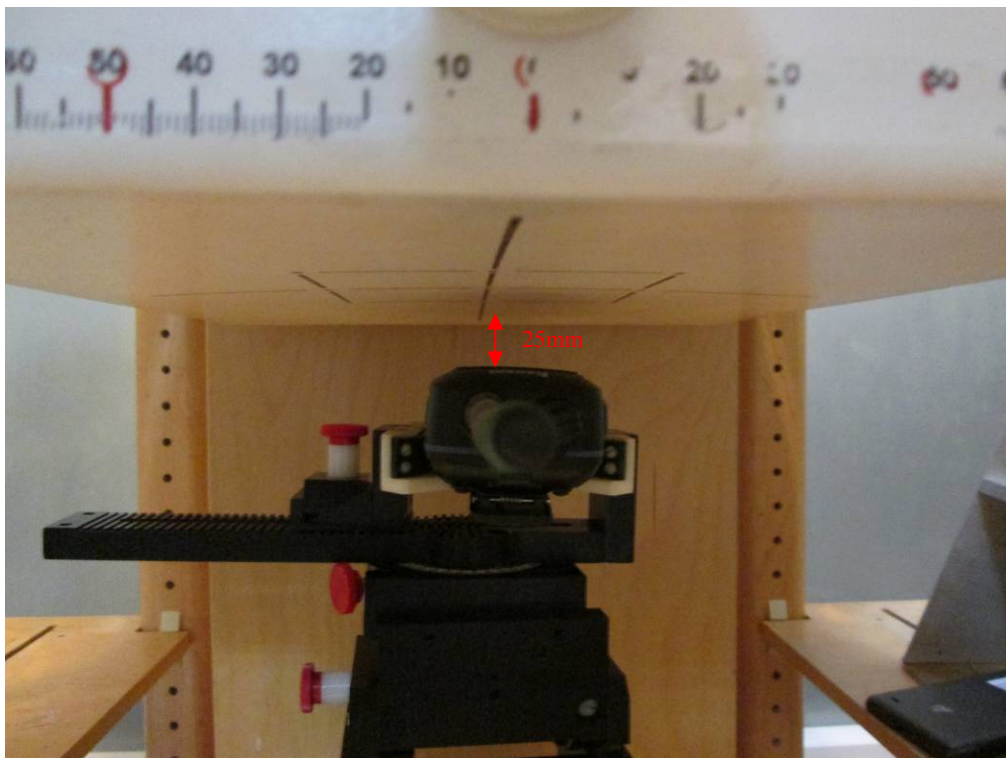


## APPENDIX D – EUT TEST POSITION PHOTOS

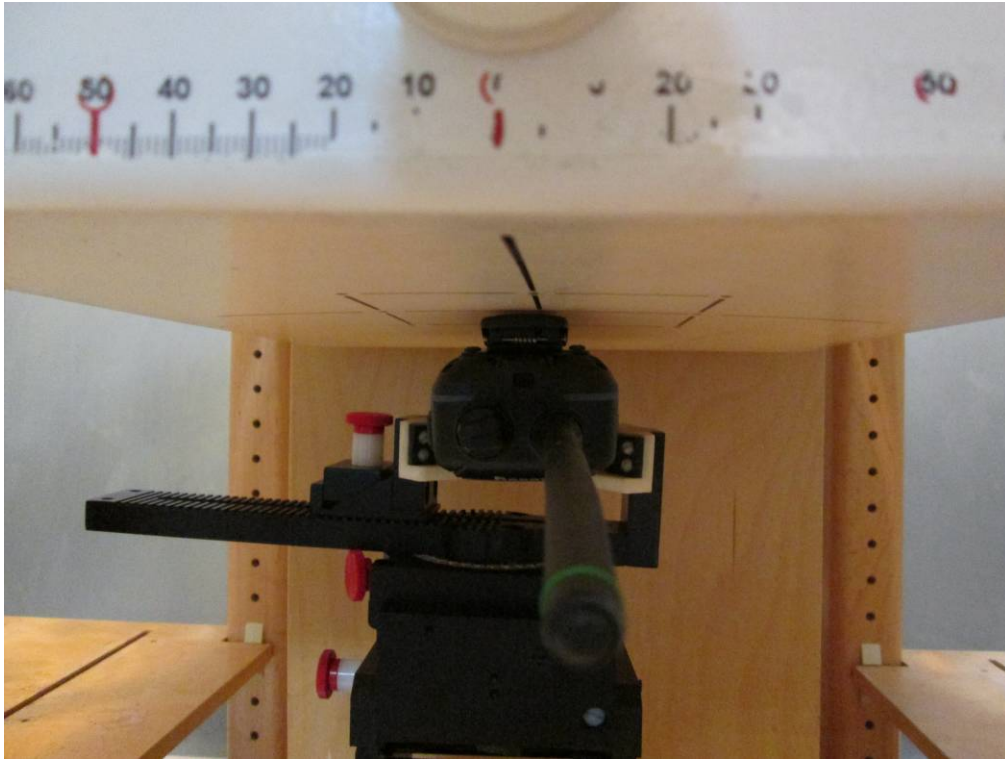
Liquid depth  $\geq 15\text{cm}$



Face-Up 2.5 cm Separation to Flat Phantom



**Body-Back 0.0 cm Separation to Flat Phantom**



### APPENDIX E – EUT PHOTOS

**EUT – Front View**



**EUT – Back View**



**EUT-Left View**



**EUT-Right View**



**EUT-Top View**

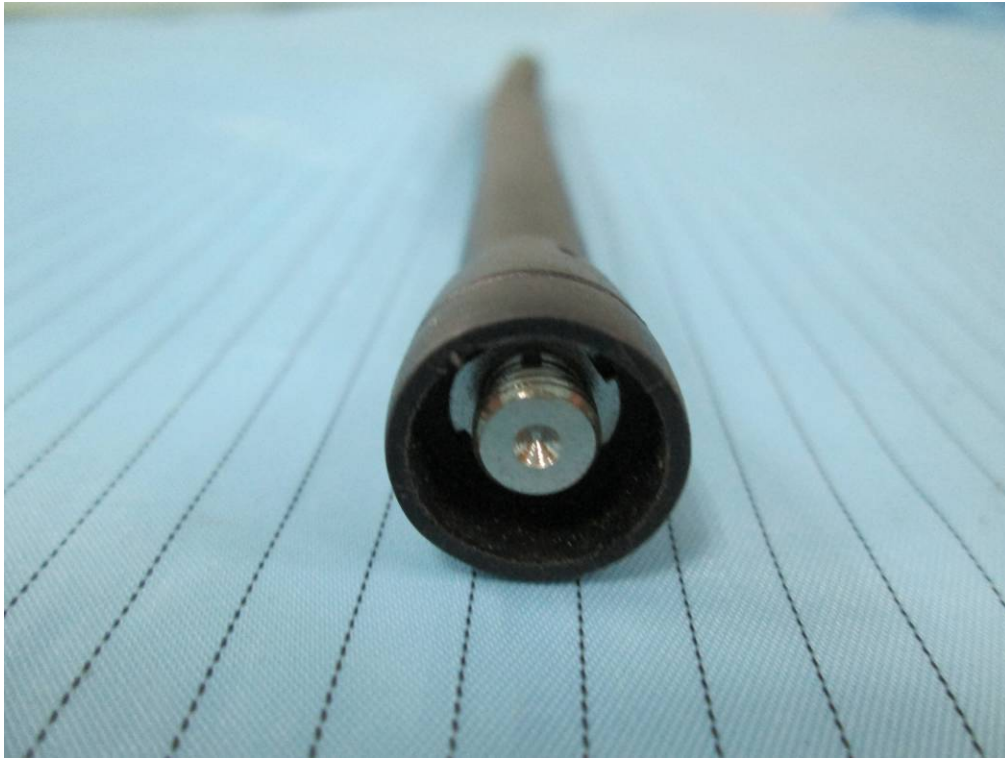


**EUT-Bottom View**





**EUT-Antenna**



**EUT - Belt Clip**



## APPENDIX F – INFORMATIVE REFERENCES

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- [1] Federal Communications Commission, "Report and order: Guidelines for evaluating the environmental effects of radiofrequency radiation", Tech. Rep. FCC 96-326, FCC, Washington, D.C. 20554, 1996.
- [2] David L. Means Kwok Chan, Robert F. Cleveland, "Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields", Tech. Rep., Federal Communication Commission, Office of Engineering & Technology, Washington, DC, 1997.
- [3] Thomas Schmid, Oliver Egger, and Niels Kuster, "Automated E-field scanning system for dosimetric assessments", IEEE Transactions on Microwave Theory and Techniques, vol. 44, pp. 105-113, Jan. 1996.
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**PRODUCT SIMILARITY DECLARATION LETTER**

RCA Communications Systems

**Declaration of Identical**

To Whom It May Concern,

We,  RCA Communications Systems , hereby declare that the Multiple Model are identical with Testing products except the information in the below table. We require the lab to use the same test data in the Multiple Model's report. Details as below:

Testing products Description	Difference Item	Multiple Models Description
Name: MR240	Model number	RS-36M

Notes: Testing products-the products tested by BACL  
 Multiple Model- have the same or similar appearance, structure, PCB, Material and function to the testing products, and only are different for little parameters.  
 Factory: the location at which the product is produced or assembled  
 N.A. - Not Applicable

We guarantee all the information provided above is true, and notice that we'll bear all the consequences caused by any false information or concealing

Best Regards,

Signature: *Veronica Garcia*

Print Name: Veronica Garcia

Title: Manager

**\*\*\*\*\* END OF REPORT \*\*\*\*\***