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SAR EVALUATION REPORT

Applicant Name:
LG Electronics MobileComm U.S.A.
1000 Sylvan Avenue
Englewood Cliffs, NJ 07632
USA

Date of Testing:
05/03/12 - 05/09/12 & 5/25/2012
Test Site/Location:
PCTEST Lab, Columbia, MD, USA
Document Serial No.:
0Y1205070638.ZNF

FCC ID: **ZNFC195N**

APPLICANT: **LG ELECTRONICS MOBILECOMM U.S.A., INC.**

DUT Type: Portable Handset
Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Model(s): LG-C195N, C195N, LGC195N, C195n, LGC195n, LG-C195n
Test Device Serial No.: Pre-Production [S/N: 202KPAE144712]

Band & Mode	Tx Frequency	Conducted Power [dBm]	SAR	
			1 gm Head (W/kg)	1 gm Body-Worn (W/kg)
GSM/GPRS/EDGE Rx Only 850	824.20 - 848.80 MHz	32.80	0.53	0.94
GSM/GPRS/EDGE Rx Only 1900	1850.20 - 1909.80 MHz	29.82	0.94	0.34
2.4 GHz WLAN	2412 - 2462 MHz	16.30	0.60	0.06
Bluetooth	2402 - 2480 MHz	5.16	N/A	
Simultaneous SAR per KDB 690783 D01:			1.37	0.45

Note: Powers in the above table represent output powers for the SAR test configurations and may not represent the highest output powers for all configurations for each mode.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001), IEEE 1528-2003 and in applicable Industry Canada Radio Standards Specifications (RSS); for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

PCTEST certifies that no party to this application has been subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.

Randy Ortanez
President

ACCREDITED
TESTING LABORATORY
CERTIFICATE #2041.01

T A B L E   O F   C O N T E N T S

1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Tx Frequency
GSM/GPRS/EDGE Rx 850	824.20 - 848.80 MHz
GSM/GPRS/EDGE Rx 1900	1850.20 - 1909.80 MHz
2.4 GHz WLAN	2412 - 2462 MHz
Bluetooth	2402 - 2480 MHz

1.2 DUT Antenna Locations

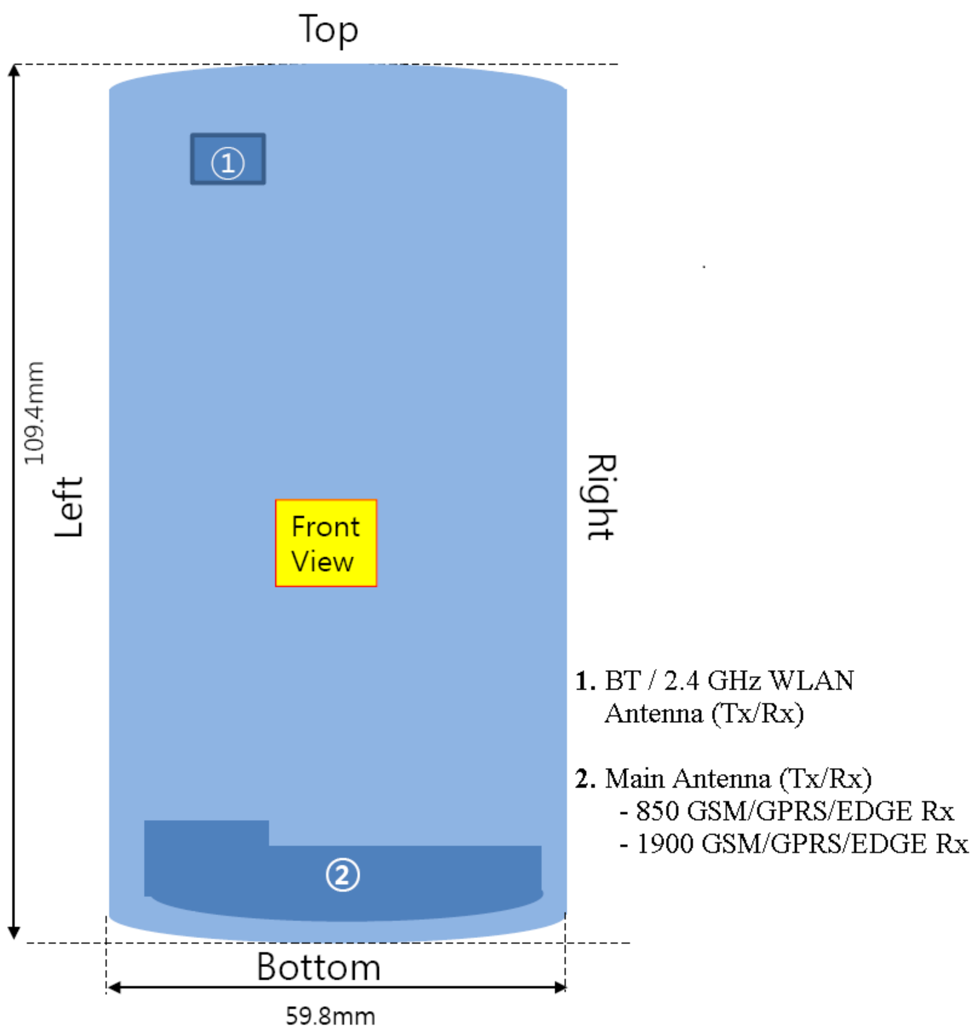

Figure 1-1
DUT Antenna Locations

1.3 SAR Test Exclusions Applied

(A) WIFI/BT

The separation between the main antenna and the Bluetooth and WLAN antennas is 87.6 mm.
RF Conducted Power of Bluetooth Tx is 3.281 mW (Please refer to the EMC DSS Report for a full set of Bluetooth conducted powers).

2.4 GHz WIFI and Bluetooth share the same antenna path and cannot transmit simultaneously.

The manufacturer has confirmed that this device does not support mobile hotspot.

Per KDB Publication 648474, **Bluetooth SAR was not required** based on the maximum conducted power, the Bluetooth/WLAN to main antenna separation distance and Body-SAR of the main antenna.

(B) Licensed Transmitter(s)

This model does not support Simultaneous Voice and Data for the licensed transmitter in any modes.

GSM/GPRS DTM is not supported. Therefore GSM Voice cannot transmit simultaneously with GPRS Data.

1.4 Power Reduction for SAR

There is no power reduction for any band/mode implemented in this device for SAR purposes.

1.5 Guidance Applied

- FCC OET Bulletin 65 Supplement C [June 2001]
- FCC KDB 941225 (2G/3G)
- FCC KDB 248227 (802.11)
- FCC KDB 648474 (Simultaneous)
- IEEE 1528-2003

2 INTRODUCTION

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [24]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

2.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

Equation 2-1
SAR Mathematical Equation

$$SAR = \frac{d}{dt}\left(\frac{dU}{dm}\right) = \frac{d}{dt}\left(\frac{dU}{\rho dv}\right)$$

SAR is expressed in units of Watts per Kilogram (W/kg).

$$SAR = \frac{\sigma \cdot E^2}{\rho}$$

where:

σ = conductivity of the tissue-simulating material (S/m)
ρ = mass density of the tissue-simulating material (kg/m^3)
E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

3 SAR MEASUREMENT SETUP

3.1 Automated SAR Measurement System

Measurements are performed using the DASY automated dosimetric SAR assessment system. The DASY is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of a high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the SAM phantom containing the head or body equivalent material. The robot is a six-axis industrial robot, performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). See www.speag.com for more information about the specification of the SAR assessment system.

Figure 3-1
SAR Measurement System

Figure 3-2
Near-Field Probe

Table 3-1
Composition of the Tissue Equivalent Matter

Frequency (MHz)	835	835	1900	1900	2450	2450
Tissue	Head	Body	Head	Body	Head	Body
Ingredients (% by weight)						
Bactericide	0.1	0.1				
DGBE			44.92	29.44	7.99	26.7
HEC	1	1				
NaCl	1.45	0.94	0.18	0.39	0.16	0.1
Sucrose	57	44.9				
Triton X-100					19.97	
Water	40.45	53.06	54.9	70.17	71.88	73.2

4 DOSIMETRIC ASSESSMENT

4.1 Measurement Procedure

The evaluation was performed using the following procedure:

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head interface and the horizontal grid resolution was 15mm and 15mm for frequencies < 3 GHz in the x and y directions respectively. When applicable, for frequencies above 3 GHz, a 10 mm by 10 mm resolution was used.

2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1 gram cube evaluation. SAR at this fixed point was measured and used as a reference value.

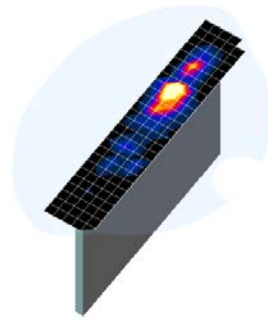

Figure 4-1
Sample SAR Area Scan

3. Based on the area scan data, the peak area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 32mm x 32mm x 30mm (fine resolution volume scan, zoom scan) was assessed by measuring at least 5 x 5 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):

    a. The data was extrapolated to the surface of the outer-shell of the phantom. The combined distance extrapolated was the combined distance from the center of the dipoles 2.7mm away from the tip of the probe housing plus the 1.2 mm distance between the surface and the lowest measuring point. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).

    b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 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 then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.

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

4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

5 DEFINITION OF REFERENCE POINTS

5.1 EAR REFERENCE POINT

Figure 5-2 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 5-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 5-2). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].

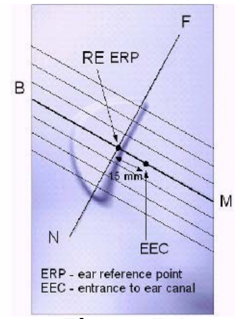

Figure 5-1
Close-Up Side view of ERP

5.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed 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" (See Figure 5-3). The "test device reference point" was than located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at it's top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.

Figure 5-2
Front, back and side view of SAM Twin Phantom

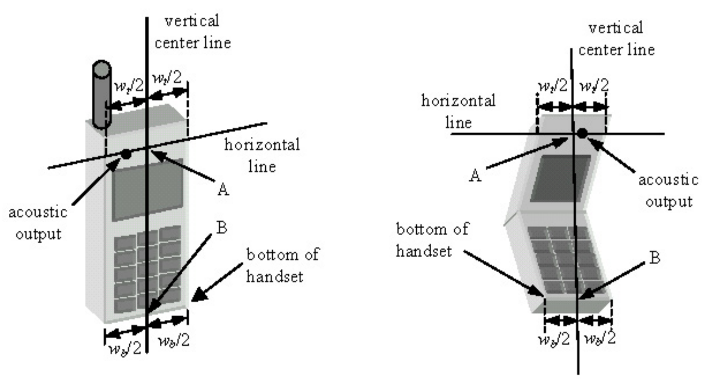

Figure 5-3
Handset Vertical Center & Horizontal Line Reference Points

6 TEST CONFIGURATION POSITIONS FOR HANDSETS

6.1 Device Holder

The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity ε = 3 and loss tangent δ = 0.02.

6.2 Positioning for Cheek/Touch

1. The test device was positioned with the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 6-1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.

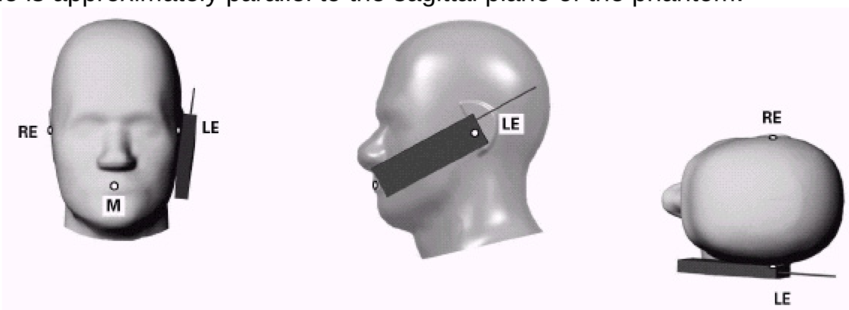

Figure 6-1 Front, Side and Top View of Cheek/Touch Position

2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the ear.
3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the plane normal to MB-NF including the line MB (reference plane).
4. The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical was respect to the line NF.
5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, the handset was rotated about the line NF until any point on the handset made contact with a phantom point below the ear (cheek) (See Figure 6-2).

6.3 Positioning for Ear / 15º Tilt

With the test device aligned in the "Cheek/Touch Position":

1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degree.
2. The phone was then rotated around the horizontal line by 15 degree.
3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the phone touches the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. The tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 6-2).

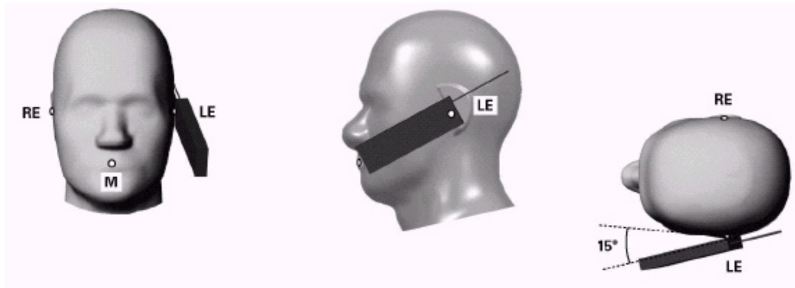

Figure 6-2 Front, Side and Top View of Ear/15º Tilt Position

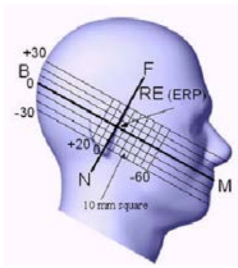

Figure 6-3
Side view w/ relevant markings

Figure 6-4 Body SAR Sample Photo
(Not Actual EUT)

6.4 SAR Evaluations near the Mouth/Jaw Regions of the SAM Phantom

Antennas located near the bottom of a phone may require SAR measurements around the mouth and jaw regions of the SAM head phantom. This typically applies to clam-shell style phones that are generally longer in the unfolded normal use positions or to certain older style long rectangular phones.

Under these circumstances, the following procedures apply, adopted from the FCC guidance on SAR handsets document publication 648474. The SAR required in these regions of SAM should be measured using a flat phantom. **Rectangular shaped phones** should be positioned with its bottom edge positioned from the flat phantom with the same distance provided by the cheek touching position using SAM. The ear reference point (ERP, as defined for SAM) of the phone should be positioned ½ cm from the flat phantom shell. **Clam-shell phones** should be positioned with the hinge against a smooth edge of the flat phantom where the upper half of the phone is unfolded and extended beyond the phantom side wall. The lower half of the phone is secured in the test device holder at a fixed distance below the flat phantom determined by the minimum separation along the lower edge of the phone in the cheek touching position using SAM. Any case with substantial variation in separation distance along the lower edge of a clam shell is discussed with the FCC for best-to-use methodology.

The latest IEEE 1528 committee developments propose the usage of a tilted phantom when the antenna of the phone is mounted at the bottom or in all cases the peak absorption is in the chin region. Both SAM heads of the TwinSAM-Chin20 are rotated 20 degrees around the NF line. Each head can be removed individually from the table for emptying and cleaning.

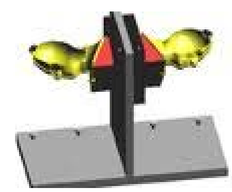

Figure 6-5 Twin SAM Chin20

6.5 Body-Worn Accessory Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 6-4). A device with a headset output is tested with a headset connected to the device.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with the device with each accessory. If multiple accessories share an identical metallic component (i.e. 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 is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used. Test position spacing was documented. Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.

7 FCC RF EXPOSURE LIMITS

7.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

7.2 Controlled Environment

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 7-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT *General Population* (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT *Occupational* (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

8 FCC MEASUREMENT PROCEDURES

Power measurements were performed using a base station simulator under digital average power.

8.1 Procedures Used to Establish RF Signal for SAR

The following procedures are according to FCC KDB Publication 941225 D01 "SAR Measurement Procedures for 3G Devices" v02, October 2007.

The device was placed into a simulated call using a base station simulator in a RF shielded chamber. Establishing connections in this manner ensure a consistent means for testing SAR and are recommended for evaluating SAR [4]. Devices under test were evaluated prior to testing, with a fully charged battery and were configured to operate at maximum output power. In order to verify that the device was tested throughout the SAR test at maximum output power, the SAR measurement system measures a "point SAR" at an arbitrary reference point at the start and end of the 1 gram SAR evaluation, to assess for any power drifts during the evaluation. If the power drift deviated by more than 5%, the SAR test and drift measurements were repeated.

8.2 SAR Testing with 802.11 Transmitters

Normal network operating configurations are not suitable for measuring the SAR of 802.11 b/g transmitters. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 for more details.

8.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters. The test frequencies should correspond to actual channel frequencies defined for domestic use. SAR for devices with switched diversity should be measured with only one antenna transmitting at a time during each SAR measurement, according to a fixed modulation and data rate. The same data pattern should be used for all measurements.

8.2.2 Frequency Channel Configurations [27]

For 2.4 GHz, the highest average RF output power channel between the low, mid and high channel at the lowest data rate was selected for SAR evaluation in 802.11b mode. 802.11g modes and higher data rates for 802.11b were additionally evaluated for SAR if the output power of the respective mode was 0.25 dB or higher than the powers of the SAR configurations tested in the 802.11b mode.

If the maximum extrapolated peak SAR of the zoom scan for the highest output channel was less than 1.6 W/kg or if the 1g averaged SAR was less than 0.8 W/kg, SAR testing was not required for the other test channels in the band.

9 RF CONDUCTED POWERS

9.1 GSM Conducted Powers

		Maximum Burst-Averaged Output Power				
		Voice	*GPRS Data (GMSK)*			
Band	**Channel**	**GSM [dBm] CS (1 Slot)**	**GPRS [dBm] 1 Tx Slot**	**GPRS [dBm] 2 Tx Slot**	**GPRS [dBm] 3 Tx Slot**	**GPRS [dBm] 4 Tx Slot**
Cellular	128	32.78	32.77	30.78	**29.13**	27.61
	190	32.80	32.78	30.81	**29.16**	27.68
	251	32.77	32.76	30.80	**29.16**	27.71
PCS	512	29.80	29.78	27.89	**26.39**	24.97
	661	29.82	29.80	27.85	**26.35**	24.89
	810	29.82	29.82	27.91	**26.38**	24.94

		Calculated Maximum Frame-Averaged Output Power				
		Voice	*GPRS Data (GMSK)*			
Band	**Channel**	**GSM [dBm] CS (1 Slot)**	**GPRS [dBm] 1 Tx Slot**	**GPRS [dBm] 2 Tx Slot**	**GPRS [dBm] 3 Tx Slot**	**GPRS [dBm] 4 Tx Slot**
Cellular	128	23.75	23.74	24.76	**24.87**	24.60
	190	23.77	23.75	24.79	**24.90**	24.67
	251	23.74	23.73	24.78	**24.90**	24.70
PCS	512	20.77	20.75	21.87	**22.13**	21.96
	661	20.79	20.77	21.83	**22.09**	21.88
	810	20.79	20.79	21.89	**22.12**	21.93

Note: Both burst-averaged and calculated frame-averaged powers are included. Frame-averaged power was calculated from the measured burst-averaged power by converting the slot powers into linear units and calculating the energy over 8 timeslots.

The bolded GPRS modes were selected according to the highest frame-averaged output power table according to KDB 941225 D03.

CS1 coding scheme was used in GPRS output power measurements and SAR Testing, as a condition where GMSK modulation was ensured. It was investigated that CS1 - CS4 settings do not have any impact on the output levels in the GPRS modes.

GSM Class: B
GPRS Multislot class: 12 (max 4 Tx Uplink slots)
EDGE Multislot class: Rx Only
DTM Multislot Class: N/A

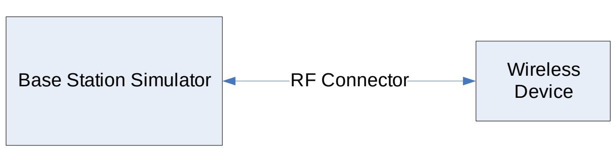

Figure 9-1
Power Measurement Setup

9.2 WLAN Conducted Powers

Table 9-1
IEEE 802.11b Average RF Power

Freq [MHz]	Channel	Data Rate [Mbps]	Average Power (dBm)
2412	**1**	**1**	**16.30**
		2	16.45
		5.5	16.40
		11	16.54
2437	6	1	16.10
		2	16.27
		5.5	16.26
		11	16.35
2462	11	1	16.13
		2	16.32
		5.5	16.41
		11	16.27

Table 9-2
IEEE 802.11g Average RF Power

Freq [MHz]	Channel	Data Rate [Mbps]	Average Power (dBm)
2412	1	6	14.54
		9	14.55
		12	14.57
		18	14.68
		24	14.43
		36	14.50
		48	14.53
		54	14.55
2437	6	6	14.41
		9	14.39
		12	14.25
		18	14.23
		24	14.34
		36	14.17
		48	14.25
		54	14.23
2462	11	6	14.49
		9	14.45
		12	14.50
		18	14.33
		24	14.35
		36	14.37
		48	14.45
		54	14.48

Justification for reduced test configurations for WIFI channels per KDB Publication 248227 and April 2010 FCC/TCB Meeting Notes:

- For 2.4 GHz, highest average RF output power channel for the lowest data rate for IEEE 802.11b were selected for SAR evaluation. Other IEEE 802.11 modes (including 802.11g) were not investigated since the average output powers over all channels and data rates were not more than 0.25 dB higher than the tested channel in the lowest data rate of IEEE 802.11b mode.
- When the maximum extrapolated peak SAR of the zoom scan for the maximum output channel is <1.6 W/kg and the 1g averaged SAR is <0.8 W/kg, SAR testing on other channels is not required. Otherwise, the other default (or corresponding required) test channels were additionally tested using the lowest data rate.
- The bolded data rate and channel above were tested for SAR.

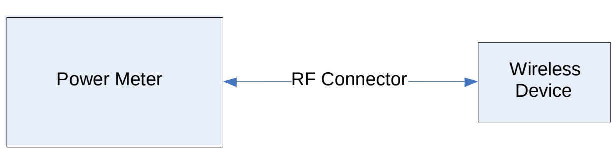

Figure 9-2
Power Measurement Setup

10 SYSTEM VERIFICATION

10.1 Tissue Verification

Table 10-1
Measured Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (C°)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ε	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ε	% dev σ	% dev ε
5/3/2012	835H	22.8	820	0.901	40.98	0.898	41.571	0.33%	-1.42%
			835	0.914	40.78	0.900	41.500	1.56%	-1.73%
			850	0.928	40.63	0.916	41.500	1.31%	-2.10%
5/9/2012	1900H	22.0	1850	1.412	39.08	1.400	40.000	0.86%	-2.30%
			1880	1.440	38.94	1.400	40.000	2.86%	-2.65%
			1910	1.468	38.82	1.400	40.000	4.86%	-2.95%
5/25/2012	1900H	22.9	1850	1.382	39.28	1.400	40.000	-1.29%	-1.80%
			1880	1.417	39.11	1.400	40.000	1.21%	-2.23%
			1910	1.453	38.99	1.400	40.000	3.79%	-2.52%
5/8/2012	2450H	22.4	2401	1.721	37.79	1.758	39.298	-2.10%	-3.84%
			2450	1.790	37.41	1.800	39.200	-0.56%	-4.57%
			2499	1.936	37.21	1.852	39.135	4.54%	-4.92%
5/9/2012	835B	23.1	820	0.977	52.79	0.969	55.284	0.83%	-4.51%
			835	0.993	52.71	0.970	55.200	2.37%	-4.51%
			850	1.009	52.57	0.988	55.154	2.13%	-4.69%
5/8/2012	1900B	22.9	1850	1.457	51.87	1.520	53.300	-4.14%	-2.68%
			1880	1.505	51.84	1.520	53.300	-0.99%	-2.74%
			1910	1.535	51.92	1.520	53.300	0.99%	-2.59%
5/7/2012	2450B	23.3	2401	1.843	51.03	1.903	52.765	-3.15%	-3.29%
			2450	1.907	50.81	1.950	52.700	-2.21%	-3.59%
			2499	1.979	50.68	2.019	52.638	-1.98%	-3.72%

Note: KDB Publication 450824 was ensured to be applied for probe calibration frequencies greater than or equal to 50 MHz of the DUT frequencies.

The above measured tissue parameters were used in the DASY software to perform interpolation via the DASY software to determine actual dielectric parameters at the test frequencies (per IEEE 1528 6.6.1.2). The SAR test plots may slightly differ from the table above since the DASY software rounds to three significant digits.

10.2 Measurement Procedure for Tissue verification

1) The network analyzer and probe system was configured and calibrated.
2) The probe was immersed in the sample which was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
3) The complex admittance with respect to the probe aperture was measured
4) The complex relative permittivity ε' can be calculated from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\varepsilon_r\varepsilon_0}{[\ln(b/a)]^2}\int_a^b\int_a^b\int_0^\pi \cos\phi' \frac{\exp\left[-j\omega r(\mu_0\varepsilon_r'\varepsilon_0)^{1/2}\right]}{r} d\phi' d\rho' d\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively, $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$, ω is the angular frequency, and $j = \sqrt{-1}$.

10.3 Test System Verification

Prior to assessment, the system is verified to ±10% of the manufacturer SAR measurement on the reference dipole at the time of calibration.

Table 10-2
System Verification Results

System Verification TARGET & MEASURED											
Tissue Frequency (MHz)	**Tissue Type**	**Date:**	**Amb. Temp (°C)**	**Liquid Temp (°C)**	**Input Power (W)**	**Dipole SN**	**Probe SN**	**Measured SAR_{1g} (W/kg)**	**1 W Target SAR_{1g} (W/kg)**	**1 W Normalized SAR_{1g} (W/kg)**	**Deviation (%)**
835	Head	05/03/2012	24.3	23.6	0.100	4d026	3258	1.01	9.460	10.100	6.77%
1900	Head	05/09/2012	22.8	21.4	0.100	502	3022	4.08	39.200	40.800	4.08%
1900	Head	05/25/2012	24.9	23.5	0.100	502	3022	3.65	39.200	36.500	-6.89%
2450	Head	05/08/2012	23.7	22.1	0.100	719	3209	5.16	53.800	51.600	-4.09%
835	Body	05/09/2012	23.2	23.1	0.100	4d026	3258	1.03	9.660	10.300	6.63%
1900	Body	05/08/2012	24.4	22.9	0.100	5d149	3561	4.23	39.300	42.300	7.63%
2450	Body	05/07/2012	21.9	21.7	0.100	882	3288	5.24	50.300	52.400	4.17%

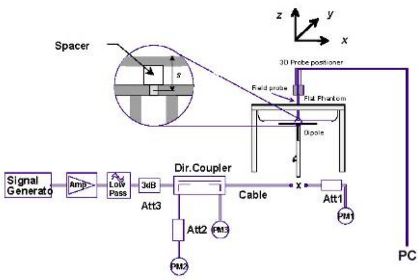

Figure 10-1
System Verification Setup Diagram

Figure 10-2
System Verification Setup Photo

11 SAR DATA SUMMARY

11.1 Standalone Head SAR Data

Table 11-1
GSM 850 Head SAR Results

MEASUREMENT RESULTS							
FREQUENCY		Mode/Band	Conducted Power [dBm]	Power Drift [dB]	Side	Test Position	SAR (1g)
MHz	Ch.						(W/kg)
836.60	190	GSM 850	32.80	-0.01	Right	Touch	0.529
836.60	190	GSM 850	32.80	0.02	Right	Tilt	0.257
836.60	190	GSM 850	32.80	0.01	Left	Touch	**0.534**
836.60	190	GSM 850	32.80	0.05	Left	Tilt	0.281
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Head 1.6 W/kg (mW/g) averaged over 1 gram		

Table 11-2
GSM 1900 Head SAR Results

MEASUREMENT RESULTS							
FREQUENCY		Mode/Band	Conducted Power [dBm]	Power Drift [dB]	Side	Test Position	SAR (1g)
MHz	Ch.						(W/kg)
1880.00	661	GSM 1900	29.82	0.00	Right	Touch	0.606
1880.00	661	GSM 1900	29.82	0.06	Right	Tilt	0.427
1850.20	512	GSM 1900	29.80	0.07	Left	Touch	**0.935**
1880.00	661	GSM 1900	29.82	0.11	Left	Touch	0.886
1909.80	810	GSM 1900	29.82	0.10	Left	Touch	0.888
1880.00	661	GSM 1900	29.82	-0.03	Left	Tilt	0.378
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Head 1.6 W/kg (mW/g) averaged over 1 gram		

Table 11-3
2.4 GHz WLAN Head SAR Results

MEASUREMENT RESULTS									
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Side	Test Position	Data Rate (Mbps)	SAR (1g)
MHz	Ch.								(W/kg)
2412	1	IEEE 802.11b	DSSS	16.30	0.03	Right	Touch	1	**0.598**
2437	6	IEEE 802.11b	DSSS	16.10	0.03	Right	Touch	1	0.512
2462	11	IEEE 802.11b	DSSS	16.13	-0.01	Right	Touch	1	0.421
2412	1	IEEE 802.11b	DSSS	16.30	0.00	Right	Tilt	1	0.538
2412	1	IEEE 802.11b	DSSS	16.30	-0.01	Left	Touch	1	0.435
2412	1	IEEE 802.11b	DSSS	16.30	0.02	Left	Tilt	1	0.492
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Head 1.6 W/kg (mW/g) averaged over 1 gram			

11.2 Standalone Body-Worn SAR Data

Table 11-4
Licensed Transmitter Body-Worn SAR Results

MEASUREMENT RESULTS									
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	# of Time Slots	Side	SAR (1g)
MHz	Ch.								(W/kg)
836.60	190	GSM 850	GSM	32.80	-0.05	1.5 cm	1	back	0.395
824.20	128	GSM 850	GPRS	29.13	0.00	1.5 cm	3	back	0.783
836.60	190	GSM 850	GPRS	29.16	-0.02	1.5 cm	3	back	0.883
848.80	251	GSM 850	GPRS	29.16	0.04	1.5 cm	3	back	**0.938**
1880.00	661	GSM 1900	GSM	29.82	0.02	1.5 cm	1	back	0.285
1880.00	661	GSM 1900	GPRS	26.35	-0.02	1.5 cm	3	back	**0.344**
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram			

Table 11-5
WLAN Body-Worn SAR Results

MEASUREMENT RESULTS									
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	Data Rate (Mbps)	Side	SAR (1g)
MHz	Ch.								(W/kg)
2412	1	IEEE 802.11b	DSSS	16.30	-0.03	1.5 cm	1	back	0.059
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram			

11.3 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001].
2. Batteries are fully charged for all readings. The standard battery was used.
3. Tissue parameters and temperatures are listed on the SAR plots.
4. Liquid tissue depth was at least 15.0 cm. To confirm the proper SAR liquid depth, the z-axis plots from the system verifications were included since the system verifications were performed using the same liquid, probe and DAE as the SAR tests in the same time period.
5. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
6. Device was tested using a fixed spacing for body-worn accessory testing. A separation distance of 15 mm was considered because the manufacturer has determined that there will be body-worn accessories available in the marketplace for users to support this separation distance.

GSM Test Notes:

1. Body-Worn accessory testing is typically associated with voice operations. Therefore, GSM voice was evaluated for body-worn SAR using headphones.
2. Per FCC Guidance, GPRS Data mode is additionally required for body-worn configuration.
3. Justification for reduced test configurations per KDB Publication 941225 D03: The source-based time-averaged output power was evaluated for all multi-slot operations. Worst case was evaluated for SAR.

WLAN Notes:

1. Justification for reduced test configurations for WIFI channels per KDB Publication 248227 and April 2010 FCC/TCB Meeting Notes for 2.4 GHz WIFI: Highest average RF output power channel for the lowest data rate was selected for SAR evaluation in 802.11b. Other IEEE 802.11 modes (including 802.11g) were not investigated since the average output powers over all channels and data rates were not more than 0.25 dB higher than the tested channel in the lowest data rate of IEEE 802.11b mode.
2. WLAN transmission was verified using an uncalibrated spectrum analyzer.
3. When the maximum extrapolated peak SAR of the zoom scan for the maximum output channel is <1.6 W/kg and the 1g averaged SAR is <0.8 W/kg, SAR testing on other channels is not required. Otherwise, the other default (or corresponding required) test channels were additionally tested using the lowest data rate.

12 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

12.1 Introduction

The following procedures adopted from “FCC SAR Considerations for Cell Phones with Multiple Transmitters” FCC KDB Publication 648474 are applicable to handsets with built-in unlicensed transmitters such as 802.11b/g/n and Bluetooth devices which may simultaneously transmit with the licensed transmitter.

12.2 FCC Power Tables & Conditions

	2.45	5.15 - 5.35	5.47 - 5.85	GHz
P_{Ref}	12	6	5	mW
Device output power should be rounded to the nearest mW to compare with values specified in this table.				

Figure 12-1
Output Power Thresholds for Unlicensed Transmitters

	Individual Transmitter	Simultaneous Transmission
Licensed Transmitters	Routine evaluation required	SAR not required: Unlicensed only ○ when stand-alone 1-g SAR is not required and antenna is ≥ 5 cm from other antennas
Unlicensed Transmitters	When there is no simultaneous transmission – ○ output ≤ 60/f: SAR not required ○ output > 60/f: stand-alone SAR required When there is simultaneous transmission – Stand-alone SAR not required when ○ output ≤ 2·P_{Ref} and antenna is ≥ 5.0 cm from other antennas ○ output ≤ P_{Ref} and antenna is ≥ 2.5 cm from other antennas ○ output ≤ P_{Ref} and antenna is < 2.5 cm from other antennas, each with either output power ≤ P_{Ref} or 1-g SAR < 1.2 W/kg Otherwise stand-alone SAR is required When stand-alone SAR is required ○ test SAR on highest output channel for each wireless mode and exposure condition ○ if SAR for highest output channel is > 50% of SAR limit, evaluate all channels according to normal procedures	Licensed & Unlicensed ○ when the sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas ○ when SAR to peak location separation ratio of simultaneous transmitting antenna pair is < 0.3 SAR required: Licensed & Unlicensed antenna pairs with SAR to peak location separation ratio ≥ 0.3; test is only required for the configuration that results in the highest SAR in stand-alone configuration for each wireless mode and exposure condition Note: simultaneous transmission exposure conditions for head and body can be different for different style phones; therefore, different test requirements may apply

Figure 12-2
SAR Evaluation Requirements for Multiple Transmitter Handsets

According to Figure 12-1 and Figure 12-2, simultaneous transmission analysis of SAR may be required for this device for the licensed and unlicensed transmitters. Possible simultaneous transmissions for this device were numerically summed using stand-alone SAR data and are shown in the following tables.

Per KDB Publication 648474, standalone Bluetooth SAR tests were not required. Standalone SAR tests for WLAN were required. See Section 1.3(A) for more information.

12.3 Head SAR Simultaneous Transmission Analysis

Table 12-1
Simultaneous Transmission Scenario (Held to Ear)

Simult Tx	Configuration	GSM 850 SAR (W/kg)	2.4 GHz WLAN SAR (W/kg)	Σ SAR (W/kg)	Simult Tx	Configuration	GSM 1900 SAR (W/kg)	2.4 GHz WLAN SAR (W/kg)	Σ SAR (W/kg)
Head SAR	Right Cheek	0.529	0.598	**1.127**	Head SAR	Right Cheek	0.606	0.598	1.204
	Right Tilt	0.257	0.538	0.795		Right Tilt	0.427	0.538	0.965
	Left Cheek	0.534	0.435	0.969		Left Cheek	0.935	0.435	**1.370**
	Left Tilt	0.281	0.492	0.773		Left Tilt	0.378	0.492	0.870

The above tables represent a held to ear voice call potentially simultaneously operating with 2.4 GHz WLAN.

12.4 Body-Worn Simultaneous Transmission Analysis

Table 12-2
Simultaneous Transmission Scenario (Body-Worn at 1.5 cm)

Configuration	Mode	GSM SAR (W/kg)	2.4 GHz WLAN SAR (W/kg)	Σ SAR (W/kg)
Back Side	GSM 850	0.395	0.059	**0.454**
Back Side	GSM 1900	0.285	0.059	0.344

The above tables represent a body-worn voice call potentially simultaneously operating with 2.4 GHz WLAN.

12.5 Simultaneous Transmission Conclusion

The above numerical summed SAR was below the SAR limit. Therefore, the above analysis is sufficient to determine that simultaneous transmission cases will not exceed the SAR limit. No volumetric SAR summation is required per FCC KDB Publication 648474.

13 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8594A	(9kHz-2.9GHz) Spectrum Analyzer	N/A	N/A	N/A	3051A00187
Agilent	8648D	(9kHz-4GHz) Signal Generator	10/10/2011	Annual	10/10/2012	3613A00315
Agilent	8753E	(30kHz-6GHz) Network Analyzer	4/4/2012	Annual	4/4/2013	JP38020182
Agilent	E5515C	Wireless Communications Test Set	10/10/2011	Annual	10/10/2012	GB46110872
Agilent	E5515C	Wireless Communications Test Set	10/20/2011	Annual	10/20/2012	GB46310798
Agilent	E5515C	Wireless Communications Test Set	10/14/2011	Annual	10/14/2012	GB41450275
Gigatronics	80701A	(0.05-18GHz) Power Sensor	10/12/2011	Annual	10/12/2012	1833460
Gigatronics	8651A	Universal Power Meter	10/12/2011	Annual	10/12/2012	8650319
Pasternack	PE2208-6	Bidirectional Coupler	6/3/2011	Annual	6/3/2012	N/A
Pasternack	PE2209-10	Bidirectional Coupler	6/3/2011	Annual	6/3/2012	N/A
Rohde & Schwarz	CMU200	Base Station Simulator	6/1/2011	Annual	6/1/2012	833855/0010
Rohde & Schwarz	NRVD	Dual Channel Power Meter	4/8/2011	Biennial	4/8/2013	101695
SPEAG	D1900V2	1900 MHz SAR Dipole	2/22/2012	Annual	2/22/2013	502
SPEAG	D2450V2	2450 MHz SAR Dipole	8/19/2011	Annual	8/19/2012	719
SPEAG	D835V2	835 MHz SAR Dipole	8/15/2011	Annual	8/15/2012	4d026
SPEAG	DAE3	Dasy Data Acquisition Electronics	11/9/2011	Annual	11/9/2012	455
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/19/2012	Annual	4/19/2013	665
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/20/2012	Annual	2/20/2013	649
SPEAG	ES3DV2	SAR Probe	8/25/2011	Annual	8/25/2012	3022
SPEAG	EX3DV4	SAR Probe	7/27/2011	Annual	7/27/2012	3561
SPEAG	ES3DV3	SAR Probe	3/16/2012	Annual	3/16/2013	3209
Anritsu	MA2481A	Power Sensor	2/14/2012	Annual	2/14/2013	5318
Anritsu	MA2481A	Power Sensor	2/14/2012	Annual	2/14/2013	5442
Anritsu	ML2438A	Power Meter	2/14/2012	Annual	2/14/2013	1190013
Anritsu	ML2438A	Power Meter	2/14/2012	Annual	2/14/2013	98150041
Anritsu	ML2438A	Power Meter	10/13/2011	Annual	10/13/2012	1070030
Anritsu	MA2481A	Power Sensor	2/14/2012	Annual	2/14/2013	5821
Anritsu	MA2481A	Power Sensor	2/14/2012	Annual	2/14/2013	8013
Anritsu	MA2481A	Power Sensor	2/14/2012	Annual	2/14/2013	2400
Agilent	E5515C	Wireless Communications Test Set	2/14/2012	Annual	2/14/2013	GB43304447
Anritsu	MA2411B	Pulse Sensor	10/13/2011	Annual	10/13/2012	1027293
Anritsu	ML2495A	Power Meter	10/13/2011	Annual	10/13/2012	1039008
Amplifier Research	5S1G4	5W, 800MHz-4.2GHz	CBT	N/A	N/A	21910
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	N/A	N/A
Agilent	E5515C	Wireless Communications Test Set	2/12/2012	Annual	2/12/2013	GB45360985
SPEAG	ES3DV3	SAR Probe	2/7/2012	Annual	2/7/2013	3288
MiniCircuits	SLP-2400+	Low Pass Filter	CBT	N/A	N/A	R8979500903
Narda	4772-3	Attenuator (3dB)	CBT	N/A	N/A	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	N/A	120
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	N/A	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	N/A	N/A
Agilent	E5515C	Wireless Communications Test Set	2/14/2012	Annual	2/14/2013	GB43163447
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/18/2012	Annual	1/18/2013	1272
Agilent	85070E	Dielectric Probe Kit	3/8/2012	Annual	3/8/2013	MY44300633
Anritsu	MT8820C	Radio Communication Tester	11/11/2011	Annual	11/11/2012	6200901190
MiniCircuits	VLF-6000+	Low Pass Filter	CBT	N/A	N/A	N/A
MiniCircuits	VLF-6000+	Low Pass Filter	CBT	N/A	N/A	N/A
Control Company	61220-416	Long-Stem Thermometer	7/1/2011	Biennial	7/1/2013	111642834
VWR	36934-158	Wall-Mounted Thermometer	9/30/2011	Biennial	9/30/2013	111859323
Seekonk	NC-100	Torque Wrench (8" lb)	11/29/2011	Triennial	11/29/2014	21053
Agilent	E5515C	Wireless Communications Test Set	2/9/2012	Annual	2/9/2013	GB43460554
Speag	DAK-3.5	Dielectric Assessment Kit	12/1/2011	Annual	12/1/2012	1031
Narda	4014C-6	4 - 8 GHz SMA 6 dB Directional Coupler	CBT	N/A	N/A	N/A
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	N/A	1139
Intelligent Weigh	PD-3000	Electronic Balance	3/27/2012	Annual	3/27/2013	11081534
COMTECH	AR85729-5/5759B	Solid State Amplifier	CBT	N/A	N/A	M3W1A00-1002
Agilent	85047A	S-Parameter Test Set	N/A	N/A	N/A	2904A00579
SPEAG	D1900V2	1900 MHz SAR Dipole	2/22/2012	Annual	2/22/2013	5d149
SPEAG	ES3DV3	SAR Probe	2/21/2012	Annual	2/21/2013	3258
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/15/2012	Annual	2/15/2013	1323
SPEAG	D2450V2	2450 MHz SAR Dipole	2/7/2012	Annual	2/7/2013	882

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

14 MEASUREMENT UNCERTAINTIES

Applicable for frequencies less than 3000 MHz.

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	**IEEE 1528 Sec.**	**Tol. (± %)**	**Prob. Dist.**	**Div.**	**c_i 1gm**	**c_i 10 gms**	**1gm u_i (± %)**	**10gms u_i (± %)**	**v_i**
Measurement System									
Probe Calibration	E.2.1	6.0	N	1	1.0	1.0	6.0	6.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	1.0	1.0	1.3	1.3	∞
Boundary Effect	E.2.3	0.4	N	1	1.0	1.0	0.4	0.4	∞
Linearity	E.2.4	0.3	N	1	1.0	1.0	0.3	0.3	∞
System Detection Limits	E.2.5	5.1	N	1	1.0	1.0	5.1	5.1	∞
Readout Electronics	E.2.6	1.0	N	1	1.0	1.0	1.0	1.0	∞
Response Time	E.2.7	0.8	R	1.73	1.0	1.0	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1.0	1.0	1.5	1.5	∞
RF Ambient Conditions	E.6.1	3.0	R	1.73	1.0	1.0	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.4	R	1.73	1.0	1.0	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E.6.3	2.9	R	1.73	1.0	1.0	1.7	1.7	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	1.0	R	1.73	1.0	1.0	0.6	0.6	∞
Test Sample Related									
Test Sample Positioning	E.4.2	6.0	N	1	1.0	1.0	6.0	6.0	287
Device Holder Uncertainty	E.4.1	3.32	R	1.73	1.0	1.0	1.9	1.9	∞
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	1.73	1.0	1.0	2.9	2.9	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	4.0	R	1.73	1.0	1.0	2.3	2.3	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Conductivity - measurement uncertainty	E.3.3	3.8	N	1	0.64	0.43	2.4	1.6	6
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Liquid Permittivity - measurement uncertainty	E.3.3	4.5	N	1	0.60	0.49	2.7	2.2	6
Combined Standard Uncertainty (k=1)			RSS				12.1	11.7	299
Expanded Uncertainty (95% CONFIDENCE LEVEL)			k=2				24.2	23.5	

The above measurement uncertainties are according to IEEE Std. 1528-2003

15 CONCLUSION

15.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Industry Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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APPENDIX A: SAR TEST DATA

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

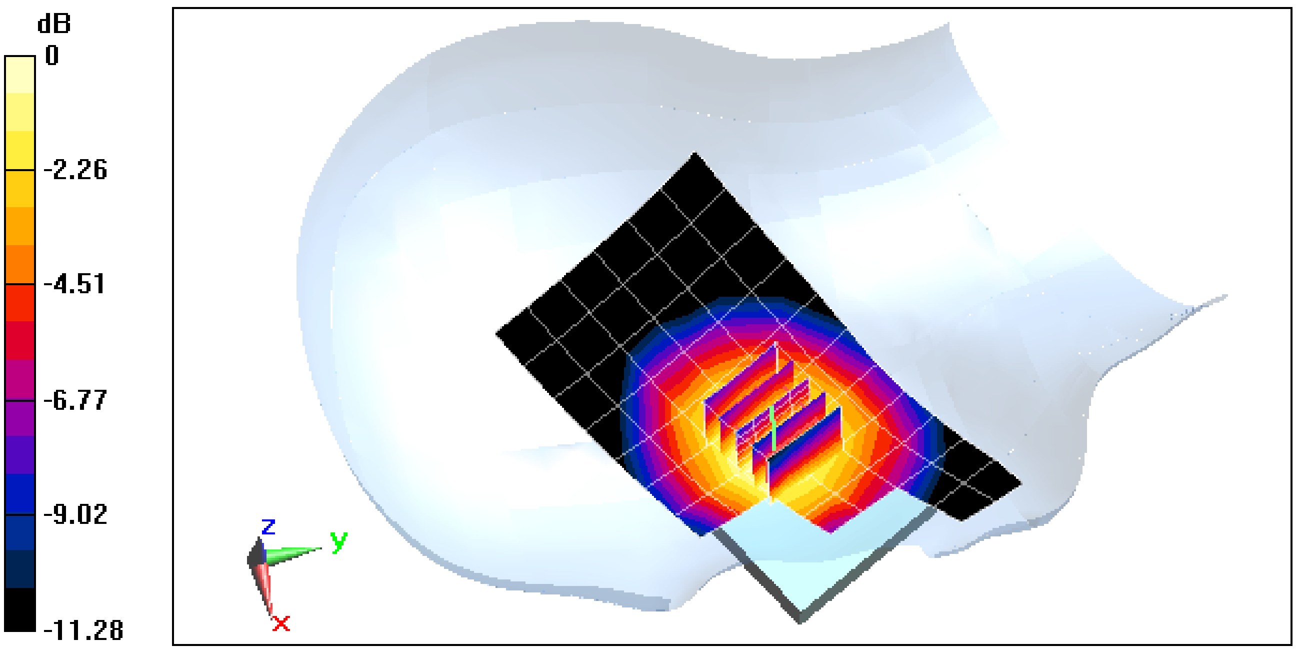
Communication System: GSM850; Frequency: 836.6 MHz;Duty Cycle: 1:8.3
Medium: 835 Head Medium parameters used (interpolated):
f = 836.6 MHz; σ = 0.915 mho/m; ε_r = 40.764; ρ = 1000 kg/m^3
Phantom section: Right Section

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 850, Right Head, Touch, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 25.167 V/m; Power Drift = -0.0083 dB
Peak SAR (extrapolated) = 0.7060
SAR(1 g) = 0.529 mW/g; SAR(10 g) = 0.381 mW/g



0 dB = 0.560mW/g = -5.04 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

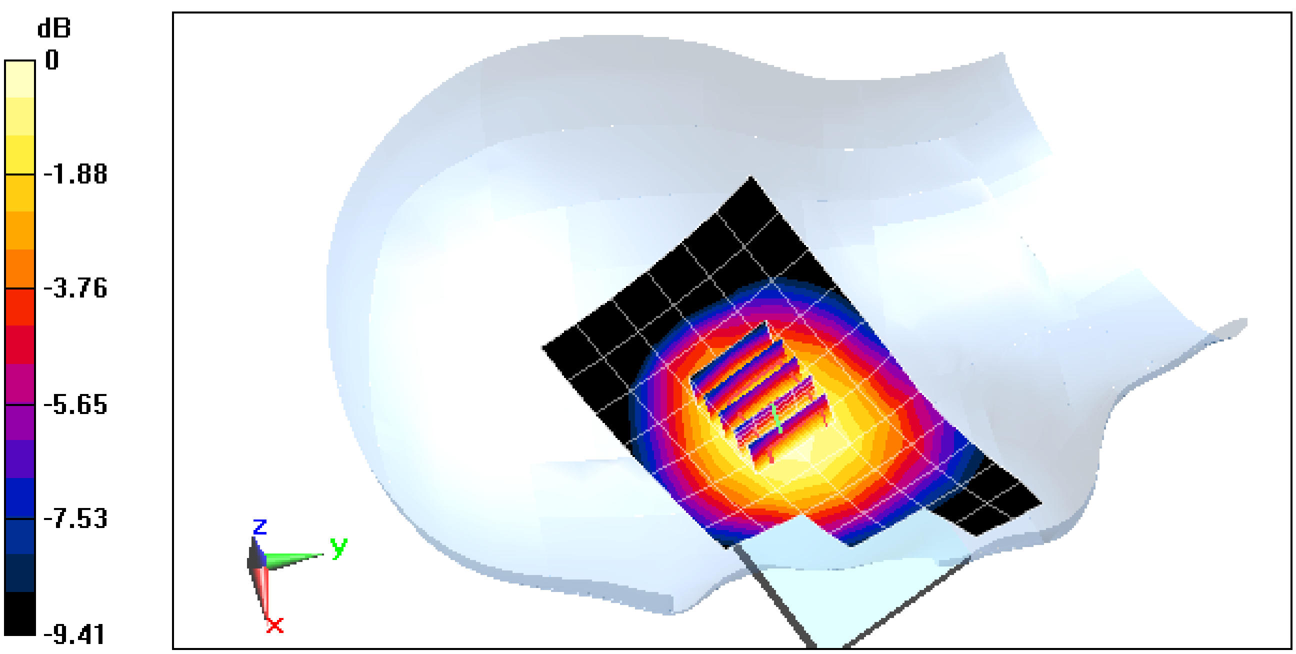
Communication System: GSM850; Frequency: 836.6 MHz;Duty Cycle: 1:8.3
Medium: 835 Head Medium parameters used (interpolated):
$f = 836.6$ MHz; $\sigma = 0.915$ mho/m; $\varepsilon_r = 40.764$; $\rho = 1000$ kg/m^3
Phantom section: Right Section

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 850, Right Head, Tilt, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 17.300 V/m; Power Drift = 0.02 dB
Peak SAR (extrapolated) = 0.3190
SAR(1 g) = 0.257 mW/g; SAR(10 g) = 0.194 mW/g



0 dB = 0.270mW/g = -11.37 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

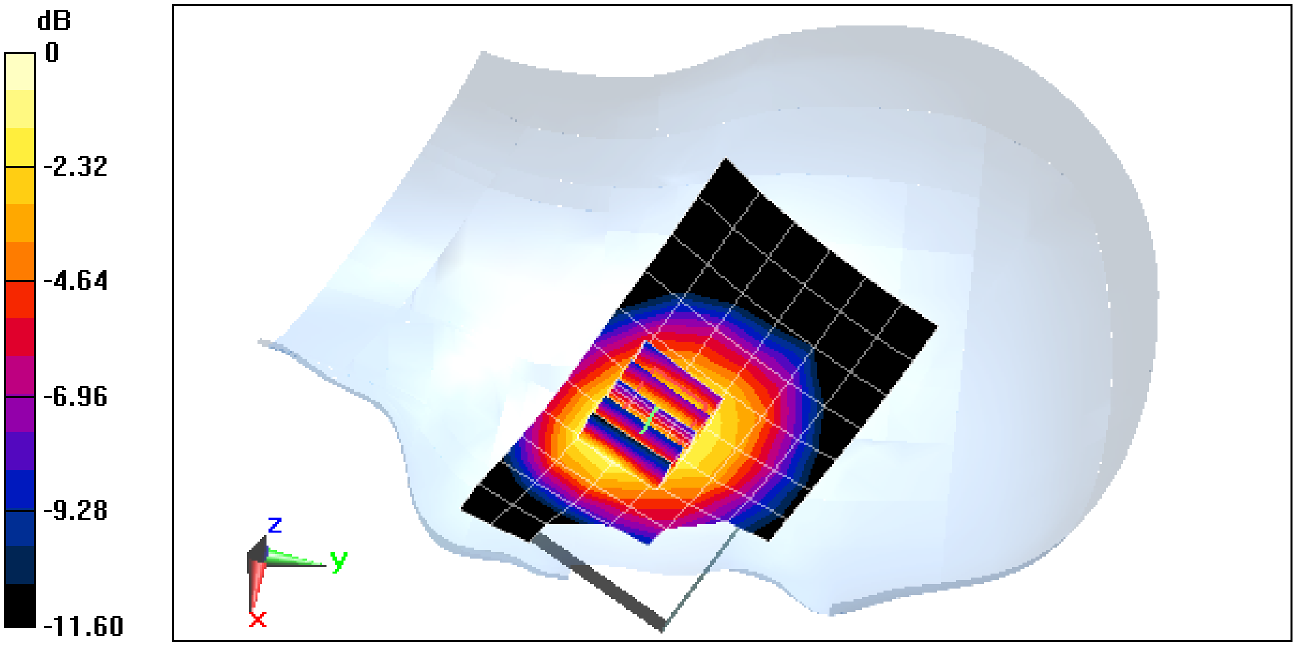
Communication System: GSM850; Frequency: 836.6 MHz;Duty Cycle: 1:8.3
Medium: 835 Head Medium parameters used (interpolated):
f = 836.6 MHz; σ = 0.915 mho/m; ε_r = 40.764; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 850, Left Head, Touch, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 25.242 V/m; Power Drift = 0.0072 dB
Peak SAR (extrapolated) = 0.7600
SAR(1 g) = 0.534 mW/g; SAR(10 g) = 0.367 mW/g



0 dB = 0.580mW/g = -4.73 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

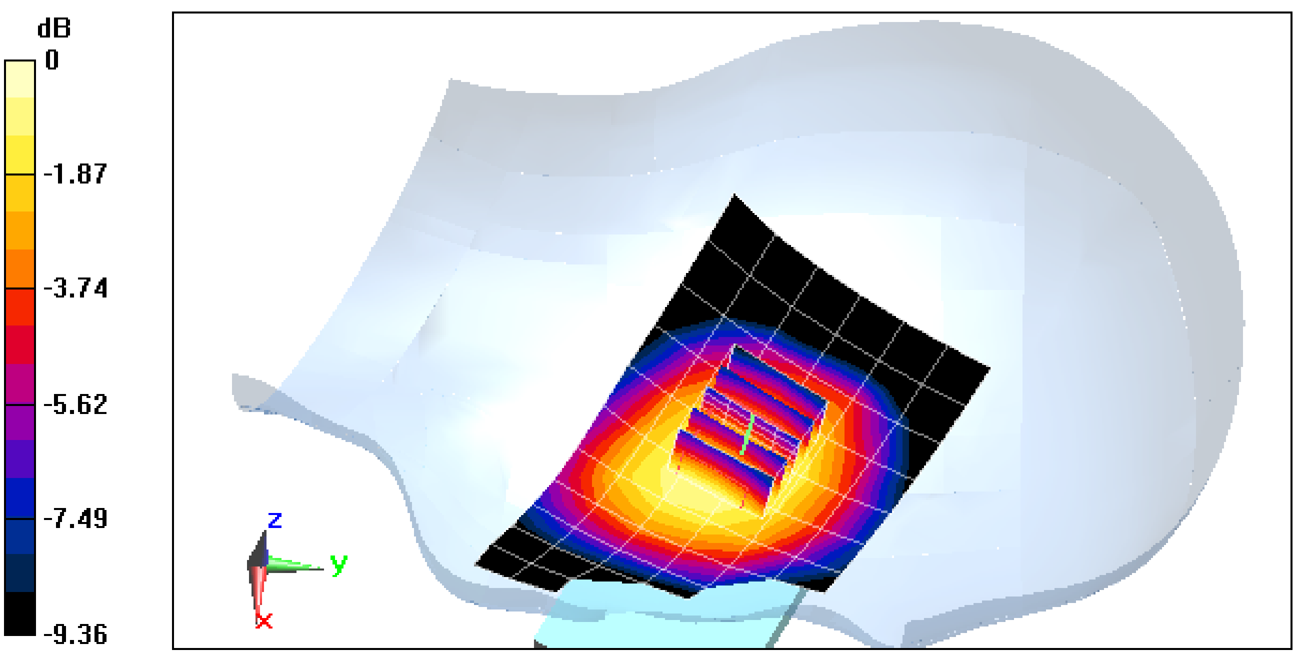
Communication System: GSM850; Frequency: 836.6 MHz;Duty Cycle: 1:8.3
Medium: 835 Head Medium parameters used (interpolated):
f = 836.6 MHz; σ = 0.915 mho/m; ε_r = 40.764; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 850, Left Head, Tilt, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 17.842 V/m; Power Drift = 0.05 dB
Peak SAR (extrapolated) = 0.3520
SAR(1 g) = 0.281 mW/g; SAR(10 g) = 0.212 mW/g



0 dB = 0.300mW/g = -10.46 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

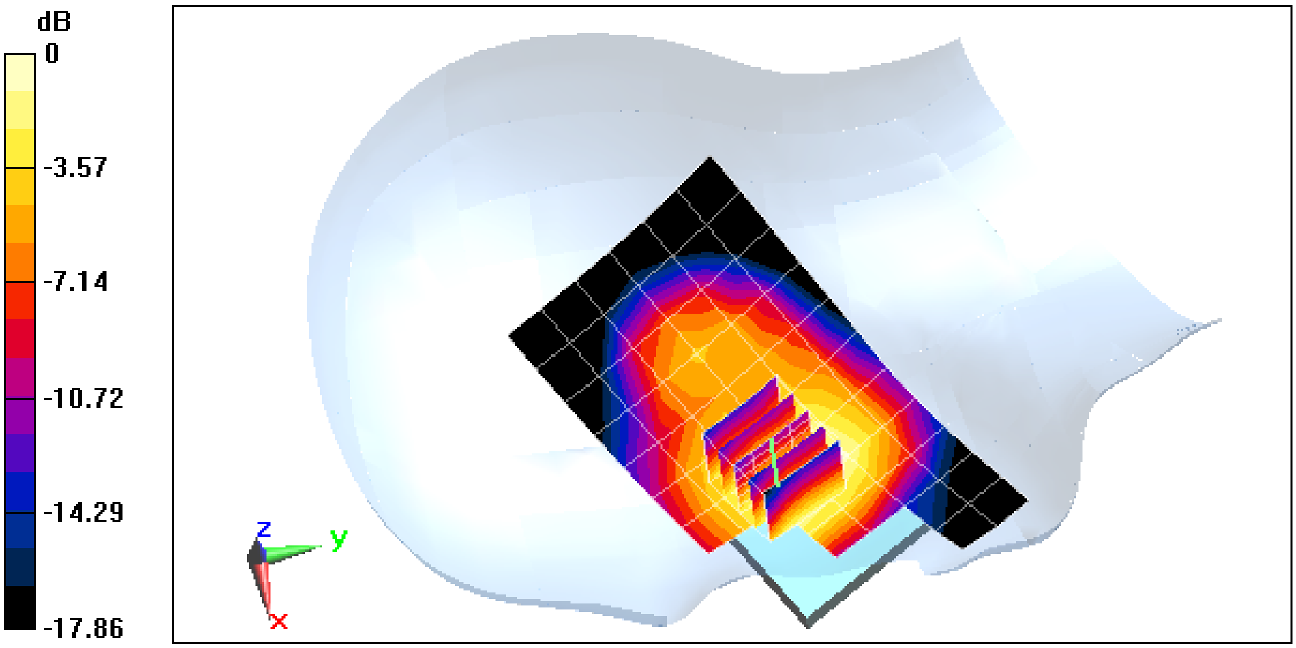
Communication System: GSM1900; Frequency: 1880 MHz;Duty Cycle: 1:8.3
Medium: 1900 Head Medium parameters used:
f = 1880 MHz; σ = 1.44 mho/m; ε_r = 38.94; ρ = 1000 kg/m^3
Phantom section: Right Section

Test Date: 05-09-2012; Ambient Temp: 22.8°C; Tissue Temp: 21.4°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 1900, Right Head, Touch, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 21.071 V/m; Power Drift = -0.0011 dB
Peak SAR (extrapolated) = 0.9080
SAR(1 g) = 0.606 mW/g; SAR(10 g) = 0.379 mW/g



0 dB = 0.650mW/g = -3.74 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

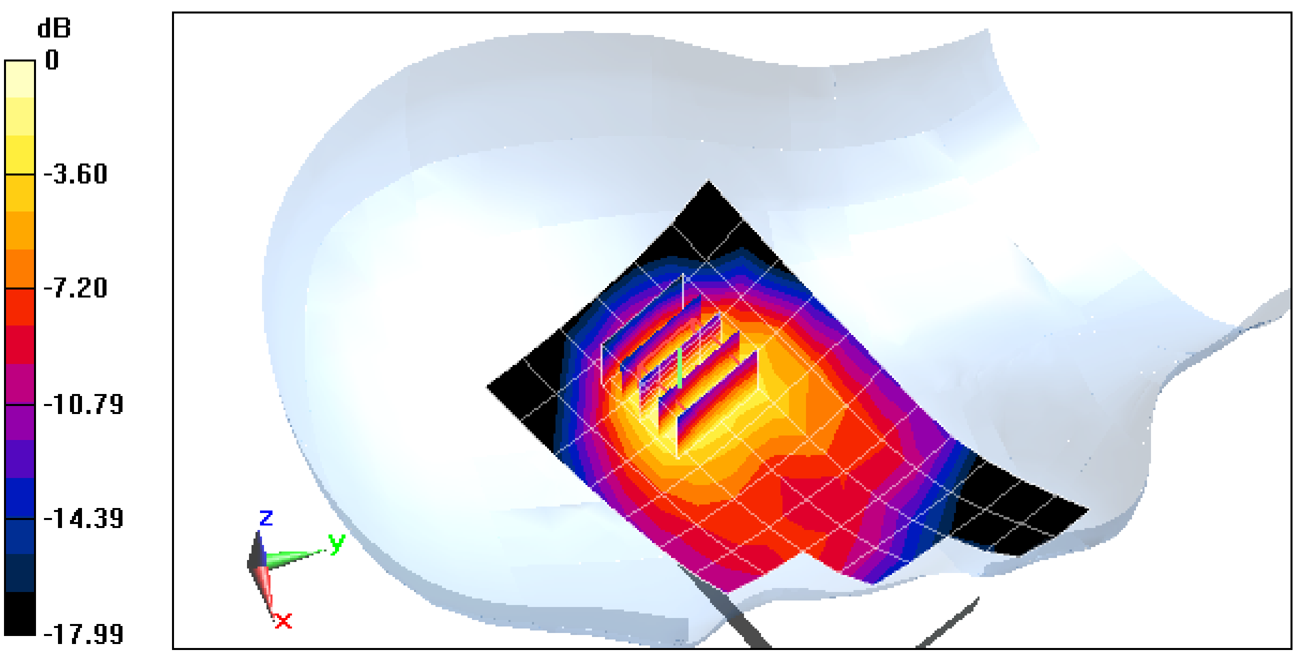
Communication System: GSM1900; Frequency: 1880 MHz;Duty Cycle: 1:8.3
Medium: 1900 Head Medium parameters used:
f = 1880 MHz; σ = 1.44 mho/m; ε_r = 38.94; ρ = 1000 kg/m^3
Phantom section: Right Section

Test Date: 05-09-2012; Ambient Temp: 22.8°C; Tissue Temp: 21.4°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 1900, Right Head, Tilt, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 17.316 V/m; Power Drift = 0.06 dB
Peak SAR (extrapolated) = 0.6800
SAR(1 g) = 0.427 mW/g; SAR(10 g) = 0.251 mW/g



0 dB = 0.460mW/g = -6.74 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

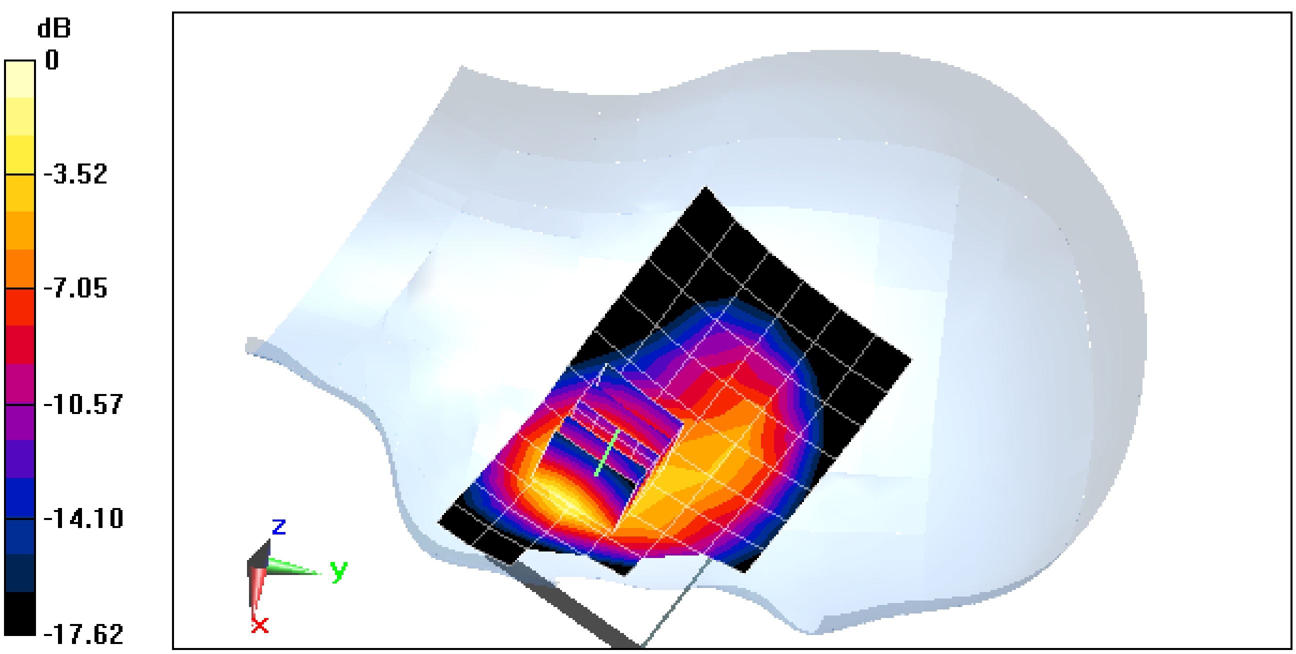
Communication System: GSM1900; Frequency: 1850.2 MHz;Duty Cycle: 1:8.3
Medium: 1900 Head Medium parameters used (interpolated):
f = 1850.2 MHz; σ = 1.382 mho/m; ε_r = 39.279; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-25-2012; Ambient Temp: 24.9°C; Tissue Temp: 23.5°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 1900, Left Head, Touch, Low.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 27.172 V/m; Power Drift = 0.07 dB
Peak SAR (extrapolated) = 1.4870
SAR(1 g) = 0.935 mW/g; SAR(10 g) = 0.536 mW/g



0 dB = 1.010mW/g = 0.09 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

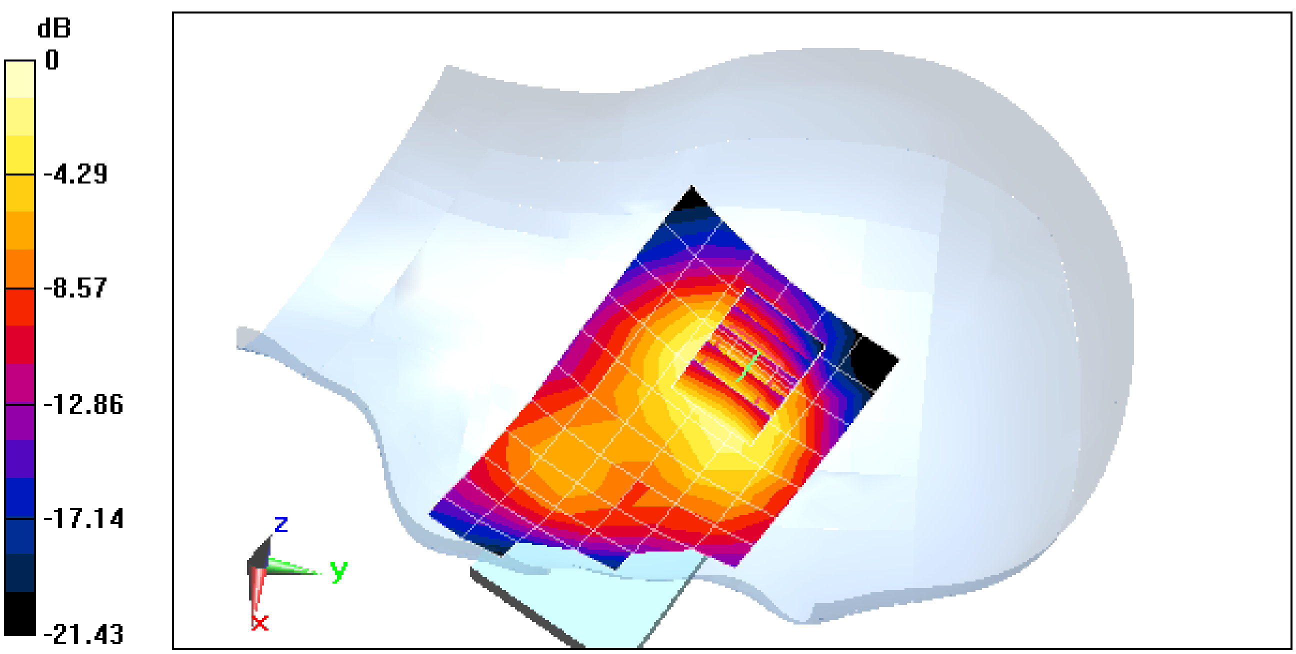
Communication System: GSM1900; Frequency: 1880 MHz;Duty Cycle: 1:8.3
Medium: 1900 Head Medium parameters used:
f = 1880 MHz; σ = 1.44 mho/m; ε_r = 38.94; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-09-2012; Ambient Temp: 22.8°C; Tissue Temp: 21.4°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GSM 1900, Left Head, Tilt, Mid.ch

Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 16.391 V/m; Power Drift = -0.03 dB
Peak SAR (extrapolated) = 0.5860
SAR(1 g) = 0.378 mW/g; SAR(10 g) = 0.229 mW/g



0 dB = 0.410mW/g = -7.74 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

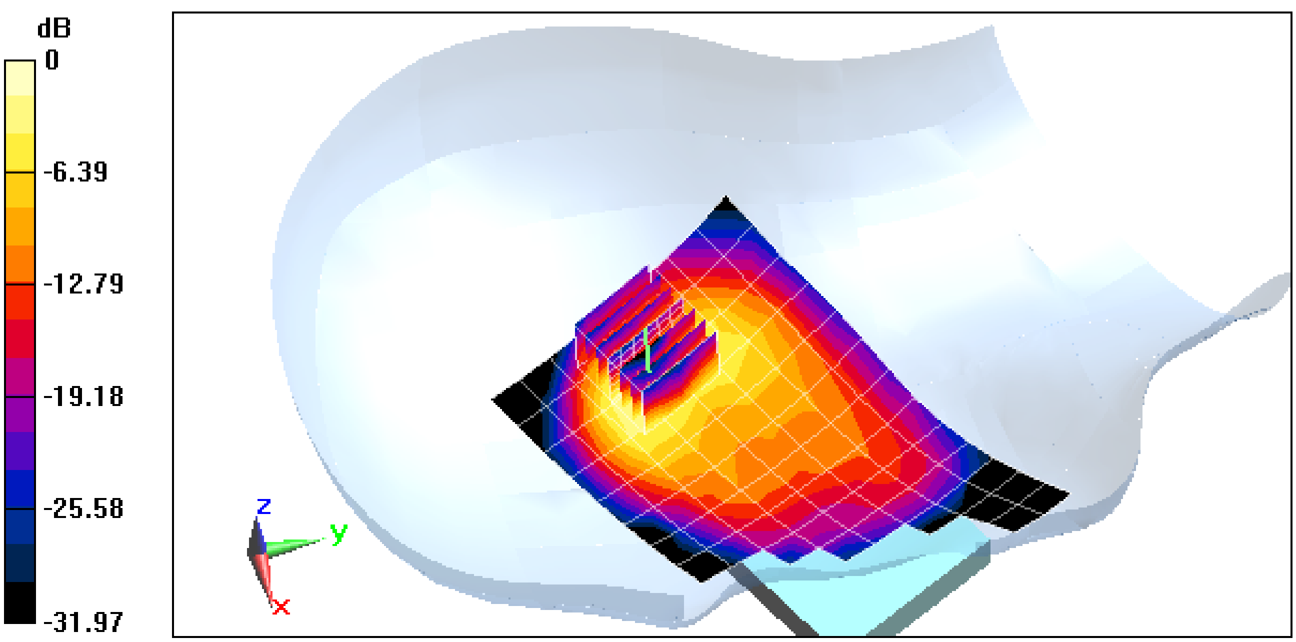
Communication System: IEEE 802.11b; Frequency: 2412 MHz;Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used (interpolated):
f = 2412 MHz; σ = 1.736 mho/m; ε_r = 37.705; ρ = 1000 kg/m^3
Phantom section: Right Section

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: IEEE 802.11b, Right Head, Touch, Ch 01, 1 Mbps

Area Scan (9x14x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 20.361 V/m; Power Drift = 0.03 dB
Peak SAR (extrapolated) = 1.7120
SAR(1 g) = 0.598 mW/g; SAR(10 g) = 0.234 mW/g



0 dB = 0.870mW/g = -1.21 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

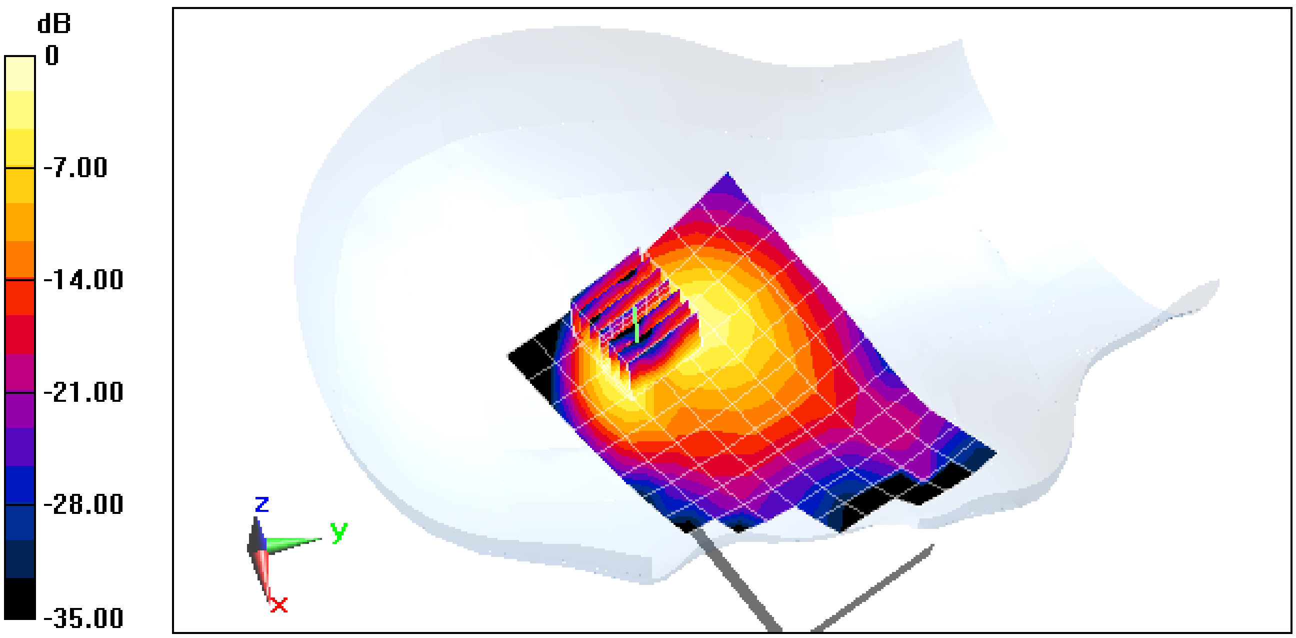
Communication System: IEEE 802.11b; Frequency: 2412 MHz,Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used (interpolated):
f = 2412 MHz; σ = 1.736 mho/m; ε_r = 37.705; ρ = 1000 kg/m^3 ,
Phantom section: Right Section

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: IEEE 802.11b, Right Head, Tilt, Ch 01, 1 Mbps

Area Scan (9x13x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 17.924 V/m; Power Drift = 0.0041 dB
Peak SAR (extrapolated) = 1.5030
SAR(1 g) = 0.538 mW/g; SAR(10 g) = 0.214 mW/g



0 dB = 0.610mW/g = -4.29 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

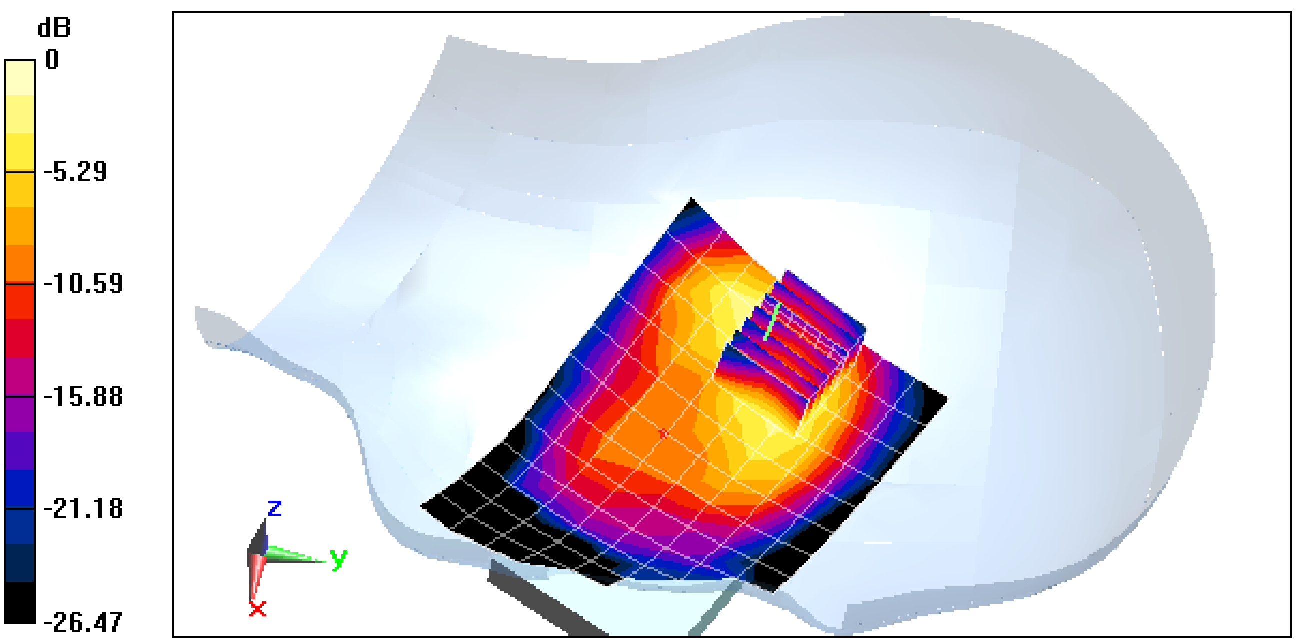
Communication System: IEEE 802.11b; Frequency: 2412 MHz;Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used (interpolated):
f = 2412 MHz; σ = 1.736 mho/m; ε_r = 37.705; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: IEEE 802.11b, Left Head, Touch, Ch 01, 1 Mbps

Area Scan (9x13x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 16.279 V/m; Power Drift = -0.0074 dB
Peak SAR (extrapolated) = 0.9010
SAR(1 g) = 0.435 mW/g; SAR(10 g) = 0.217 mW/g



0 dB = 0.570mW/g = -4.88 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

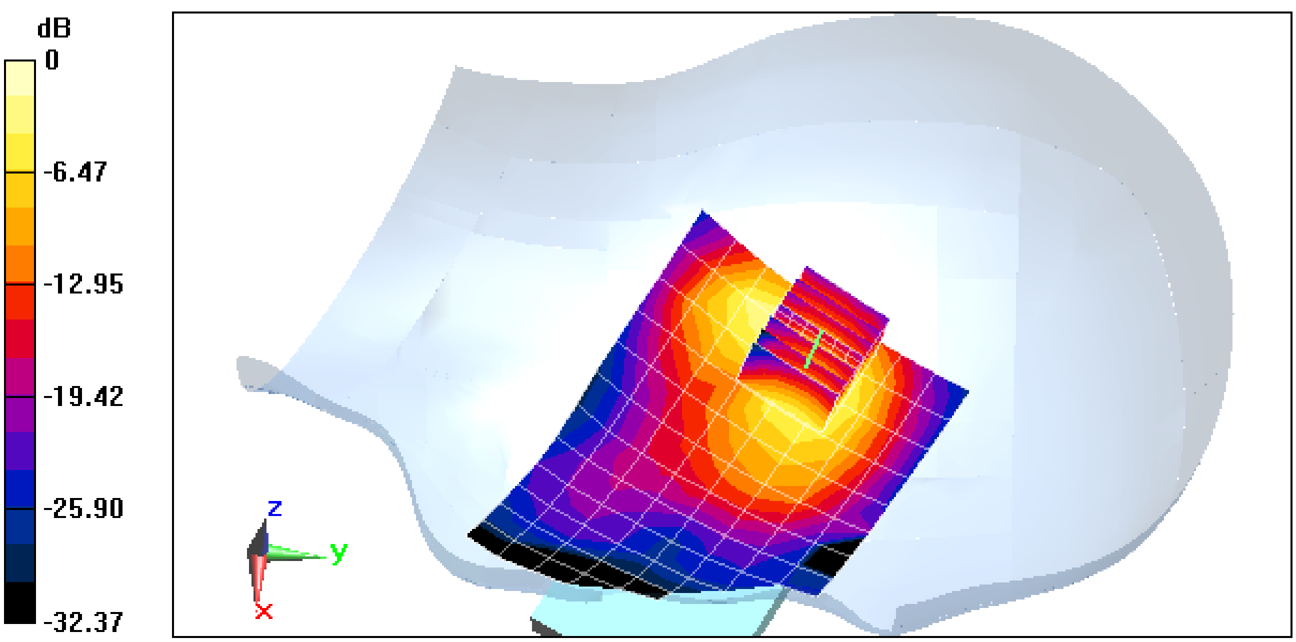
Communication System: IEEE 802.11b; Frequency: 2412 MHz;Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used (interpolated):
f = 2412 MHz; σ = 1.736 mho/m; ε_r = 37.705; ρ = 1000 kg/m^3
Phantom section: Left Section

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: IEEE 802.11b, Left Head, Tilt, Ch 01, 1 Mbps

Area Scan (9x13x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 16.835 V/m; Power Drift = 0.02 dB
Peak SAR (extrapolated) = 1.0280
SAR(1 g) = 0.492 mW/g; SAR(10 g) = 0.233 mW/g



0 dB = 0.630mW/g = -4.01 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

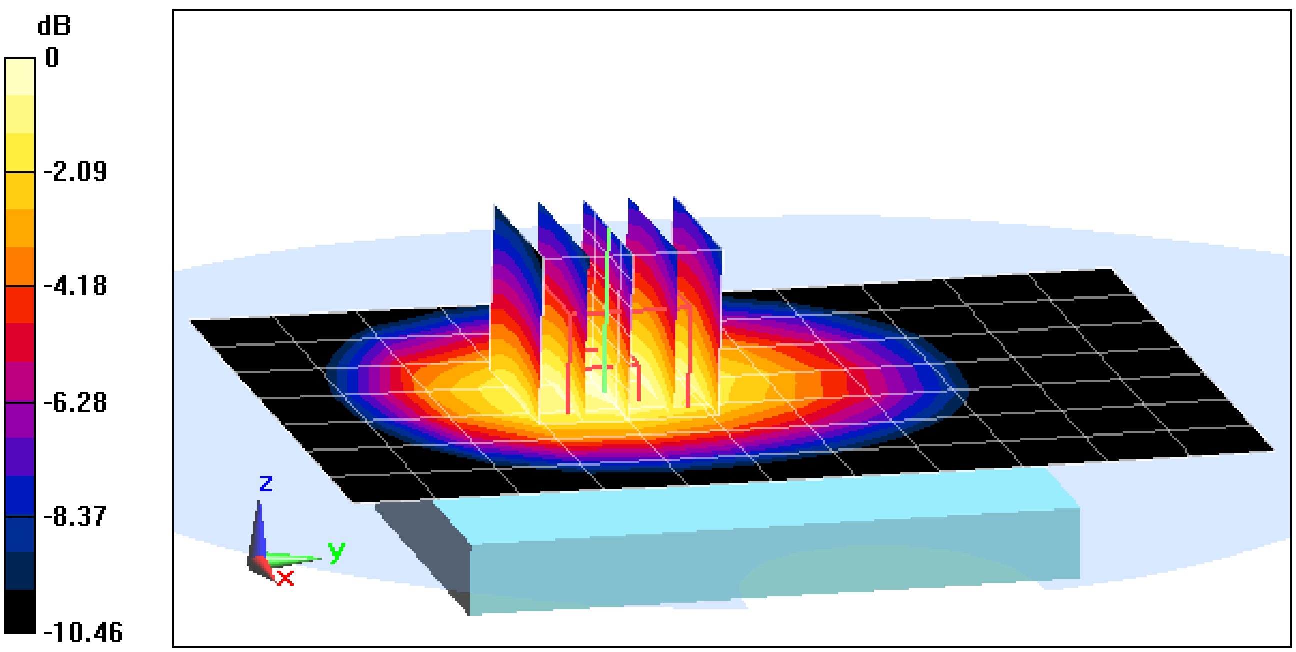
Communication System: GSM850 GPRS; 3 Tx slots; Frequency: 848.8 MHz;Duty Cycle: 1:2.76
Medium: 835 Body Medium parameters used (interpolated):
f = 848.8 MHz; σ = 1.008 mho/m; ε_r = 52.581; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-09-2012; Ambient Temp: 23.2°C; Tissue Temp: 23.1°C

Probe: ES3DV3 - SN3258; ConvF(6.06, 6.06, 6.06); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1406
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

Mode: GPRS 850, Body SAR, Back side, High.ch, 3 Tx Slots

Area Scan (8x12x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 31.876 V/m; Power Drift = 0.04 dB
Peak SAR (extrapolated) = 1.2630
SAR(1 g) = 0.938 mW/g; SAR(10 g) = 0.668 mW/g



0 dB = 1.000mW/g = 0 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

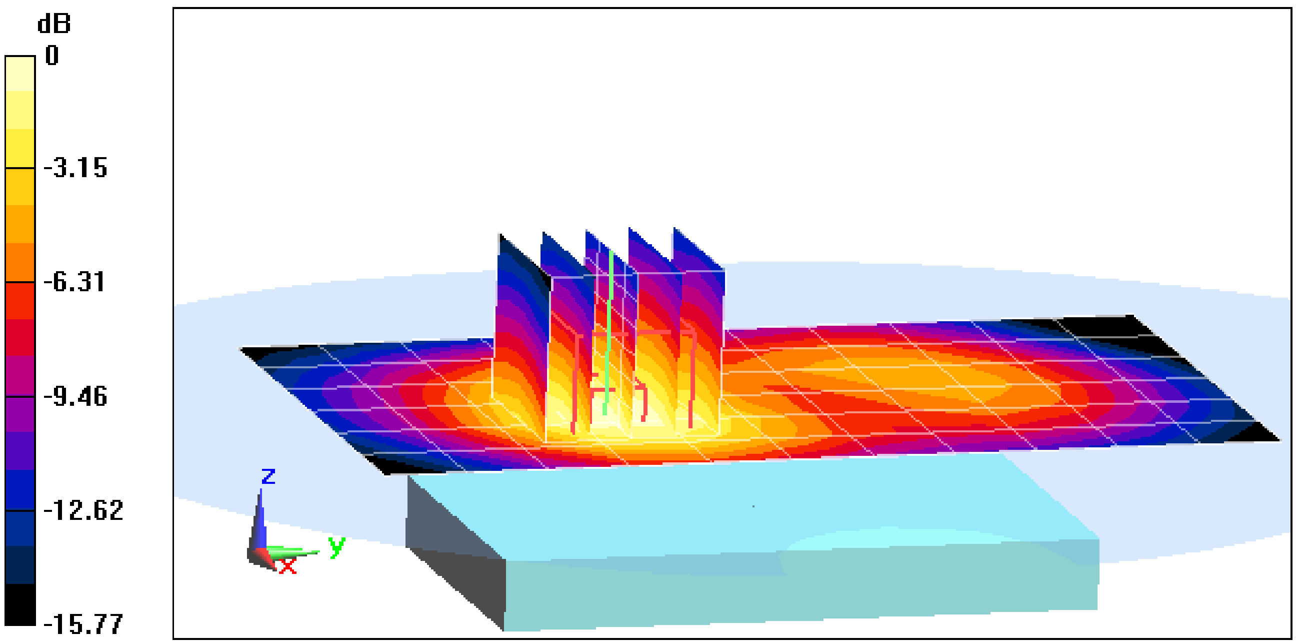
Communication System: GSM GPRS; 3 Tx slots; Frequency: 1880 MHz;Duty Cycle: 1:2.76
Medium: 1900 Body Medium parameters used:
f = 1880 MHz; σ = 1.505 mho/m; ε_r = 51.84; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-08-2012; Ambient Temp: 24.4°C; Tissue Temp: 22.9°C

Probe: EX3DV4 - SN3561; ConvF(6.58, 6.58, 6.58); Calibrated: 7/27/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE3 Sn455; Calibrated: 11/9/2011
Phantom: SAM 5.0 front; Type: QD000P40CD; Serial: TP:-1648
Measurement SW: DASY52, Version 52.8 (0); SEMCAD X Version 14.6.4 (4989)

Mode: GPRS 1900, Body SAR, Back side, Mid.ch, 3 Tx Slots

Area Scan (7x12x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 14.664 V/m; Power Drift = -0.02 dB
Peak SAR (extrapolated) = 0.5480
SAR(1 g) = 0.344 mW/g; SAR(10 g) = 0.208 mW/g



0 dB = 0.370mW/g = -8.64 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: ZNFC195N; Type: Portable Handset; Serial: 202KPAE144712

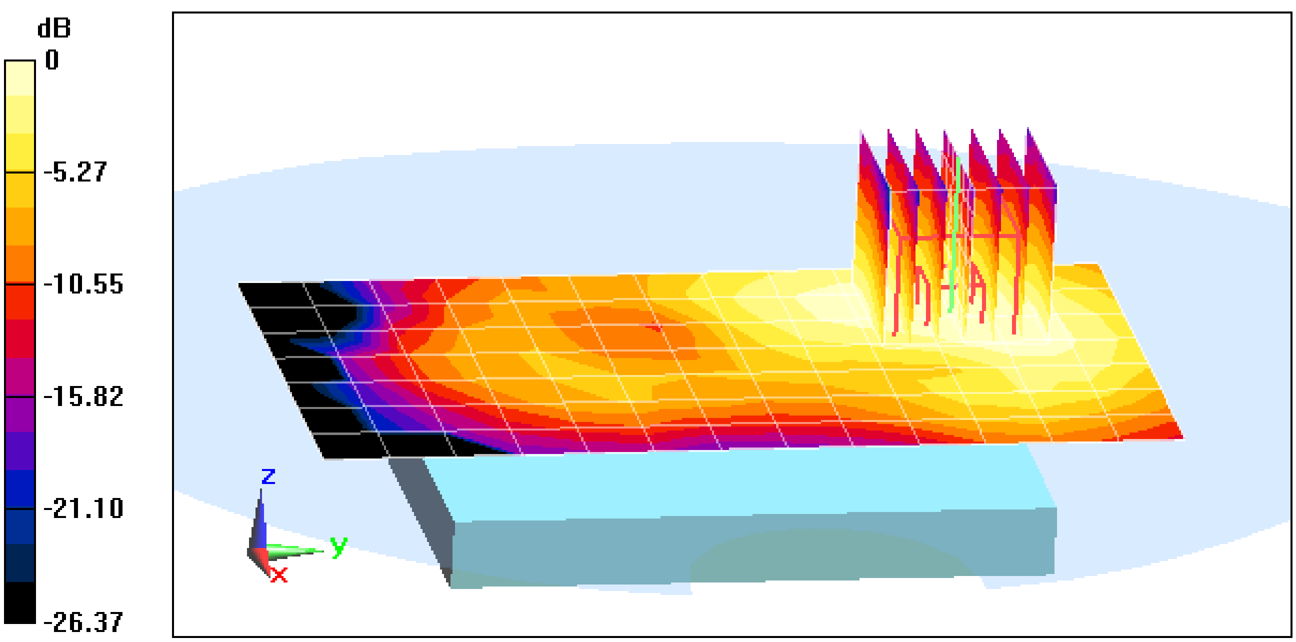
Communication System: IEEE 802.11b; Frequency: 2412 MHz;Duty Cycle: 1:1
Medium: 2450 Body Medium parameters used (interpolated):
f = 2412 MHz; σ = 1.857 mho/m; ε_r = 50.981; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-07-2012; Ambient Temp: 21.9°C; Tissue Temp: 21.7°C

Probe: ES3DV3 - SN3288; ConvF(4.47, 4.47, 4.47); Calibrated: 2/7/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn649; Calibrated: 2/20/2012
Phantom: SAM v5.0 front; Type: QD000P40CD; Serial: TP-1646
Measurement SW: DASY52, Version 52.8 (0); SEMCAD X Version 14.6.4 (4989)

Mode: IEEE 802.11b, Body SAR, Ch 01, 1 Mbps, Back Side

Area Scan (8x14x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 5.851 V/m; Power Drift = -0.03 dB
Peak SAR (extrapolated) = 0.1070
SAR(1 g) = 0.059 mW/g; SAR(10 g) = 0.034 mW/g



0 dB = 0.070mW/g = -23.10 dB mW/g

APPENDIX B: SYSTEM VERIFICATION

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 835 MHz; Type: D835V2; Serial: 4d026

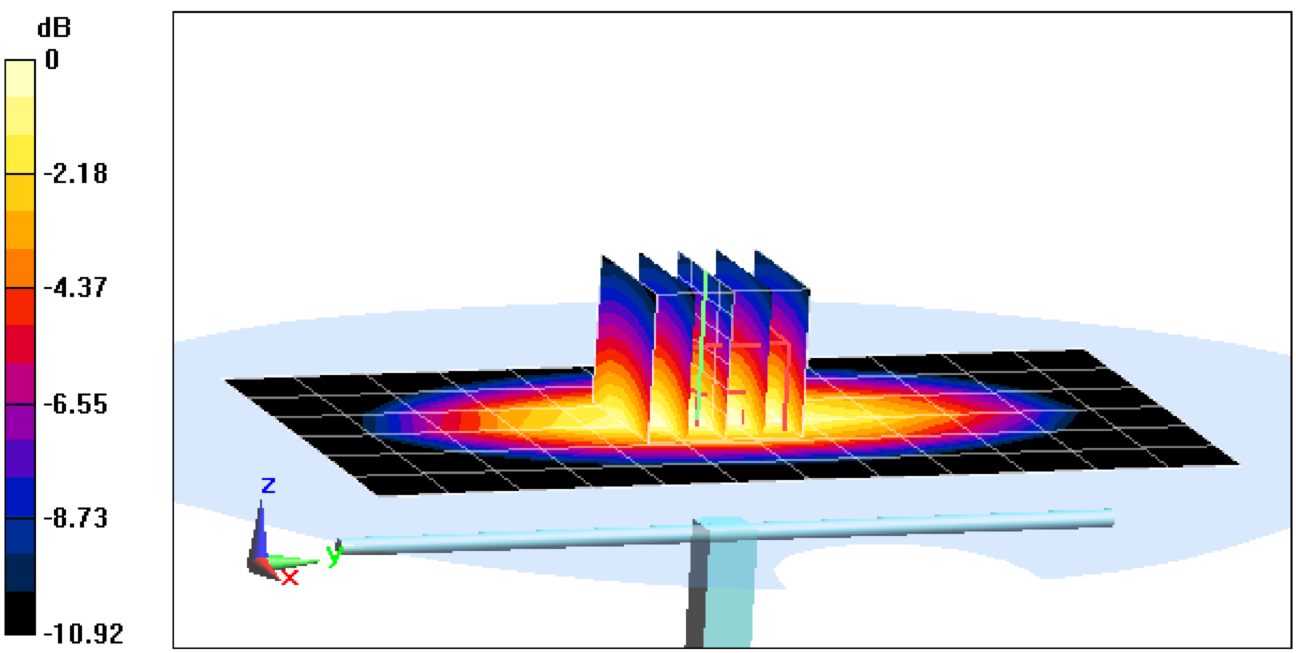
Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1
Medium: 835 Head Medium parameters used:
f = 835 MHz; σ = 0.914 mho/m; ε_r = 40.78; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

835 MHz System Verification

Area Scan (7x13x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 1.01 mW/g; SAR(10 g) = 0.655 mW/g
Deviation = 6.77 %



0 dB = 1.090mW/g = 0.75 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 835 MHz; Type: D835V2; Serial: 4d026

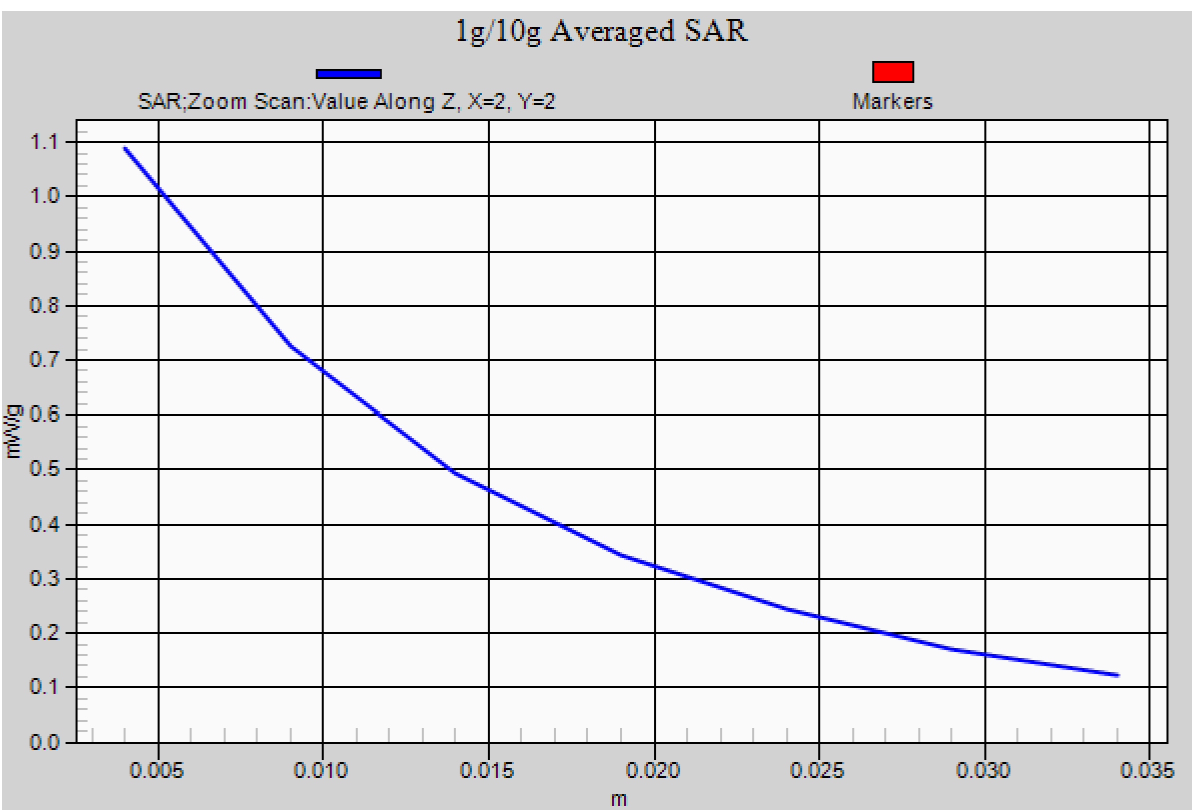
Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1
Medium: 835 Head Medium parameters used:
f = 835 MHz; σ = 0.914 mho/m; ε_r = 40.78; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-03-2012; Ambient Temp: 24.3°C; Tissue Temp: 23.6°C

Probe: ES3DV3 - SN3258; ConvF(6.01, 6.01, 6.01); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Sub; Type: SAM 4.0; Serial: TP-1403
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

835 MHz System Verification

Area Scan (7x13x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 1.01 mW/g; SAR(10 g) = 0.655 mW/g
Deviation = 6.77 %



PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 502

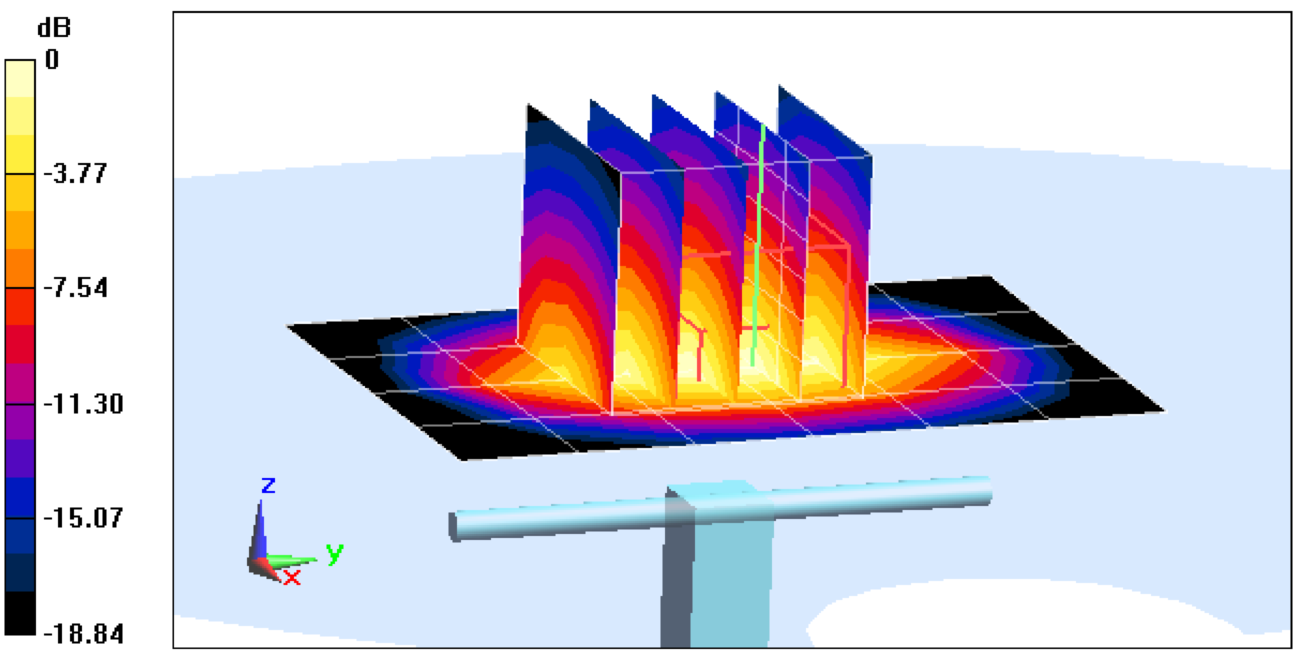
Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium: 1900 Head Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.459 mho/m; ε_r = 38.86; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-09-2012; Ambient Temp: 22.8°C; Tissue Temp: 21.4°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

1900MHz System Verification

Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 4.08 mW/g; SAR(10 g) = 2.11 mW/g
Deviation = 4.08 %



0 dB = 4.490mW/g = 13.04 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 502

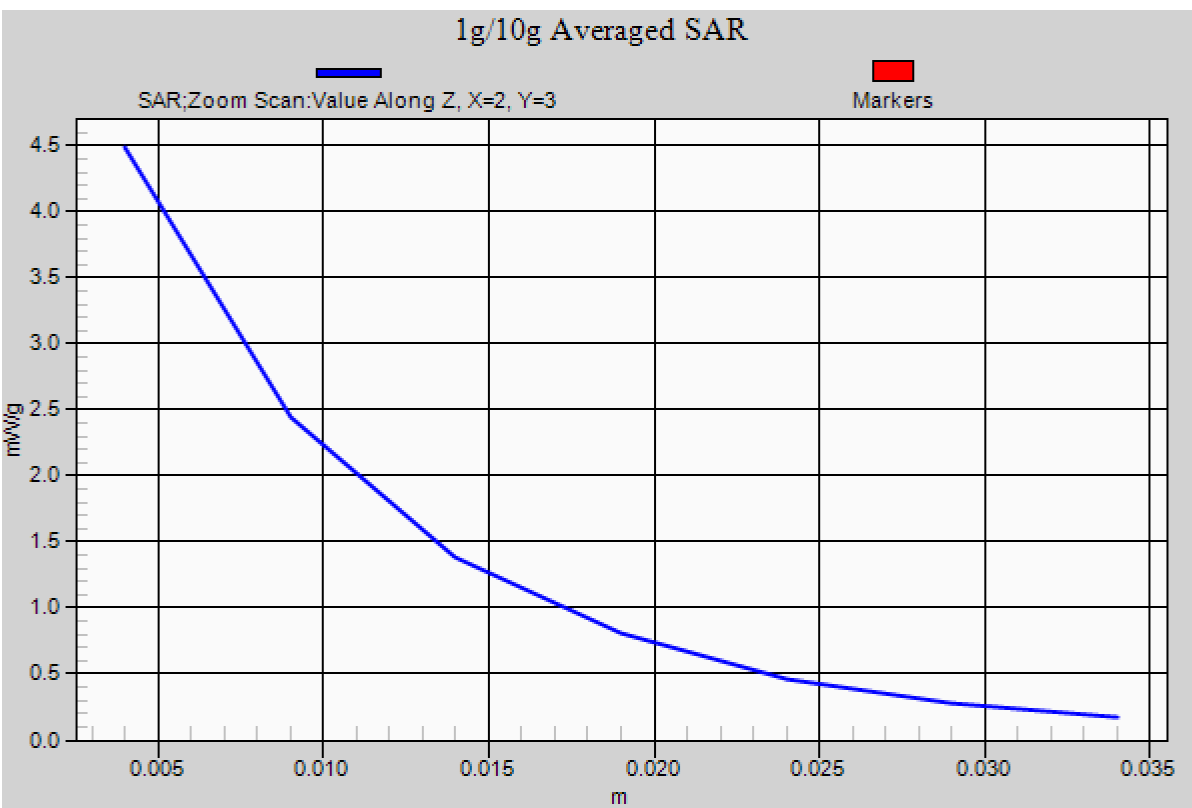
Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium: 1900 Head Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.459 mho/m; ε_r = 38.86; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-09-2012; Ambient Temp: 22.8°C; Tissue Temp: 21.4°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

1900MHz System Verification

Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 4.08 mW/g; SAR(10 g) = 2.11 mW/g
Deviation = 4.08 %



PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 502

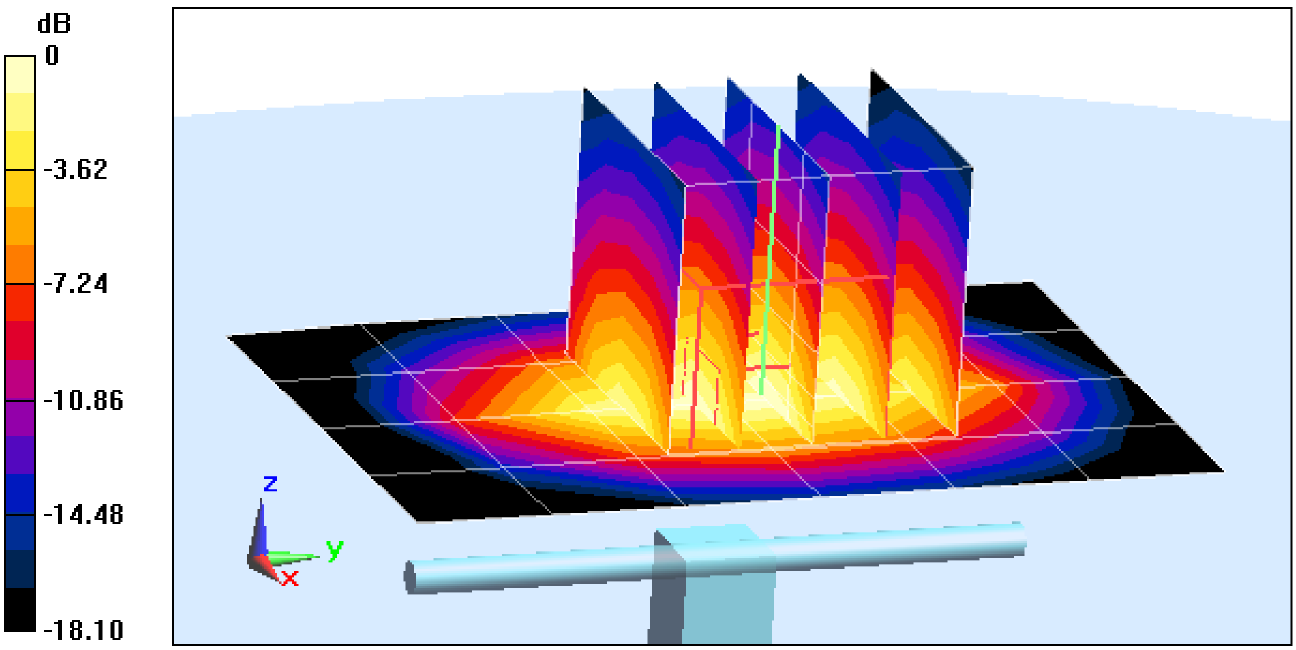
Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium: 1900 Head Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.441 mho/m; ε_r = 39.03; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-25-2012; Ambient Temp: 24.9°C; Tissue Temp: 23.5°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

1900MHz System Verification

Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x6)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=2mm
Input Power = 20.0 dBm
SAR(1 g) = 3.65 mW/g; SAR(10 g) = 1.94 mW/g
Deviation = -6.89 %



0 dB = 3.960mW/g = 11.95 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 502

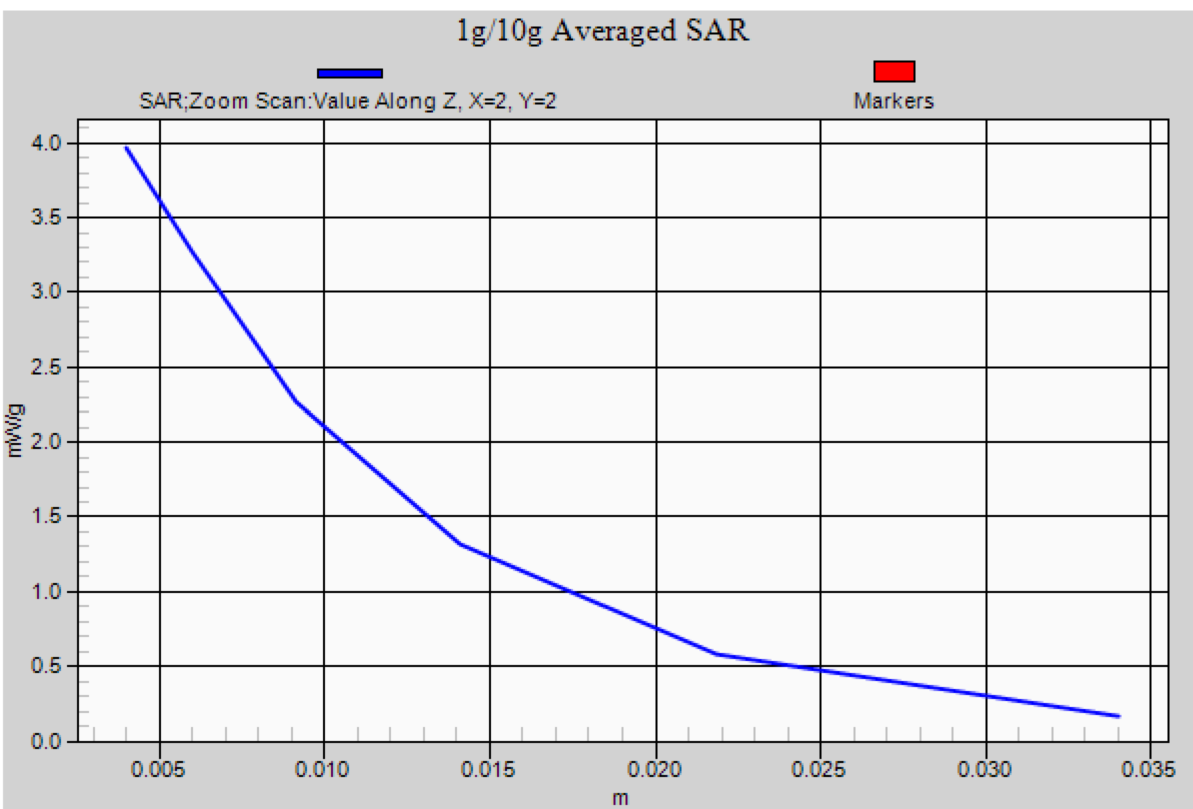
Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium: 1900 Head Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.441 mho/m; ε_r = 39.03; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-25-2012; Ambient Temp: 24.9°C; Tissue Temp: 23.5°C

Probe: ES3DV2 - SN3022; ConvF(4.98, 4.98, 4.98); Calibrated: 8/25/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn665; Calibrated: 4/19/2012
Phantom: SAM with CRP; Type: SAM; Serial: TP1375
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

1900MHz System Verification

Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x6)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=2mm
Input Power = 20.0 dBm
SAR(1 g) = 3.65 mW/g; SAR(10 g) = 1.94 mW/g
Deviation = -6.89 %



PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 2450 MHz; Type: D2450V2; Serial: 719

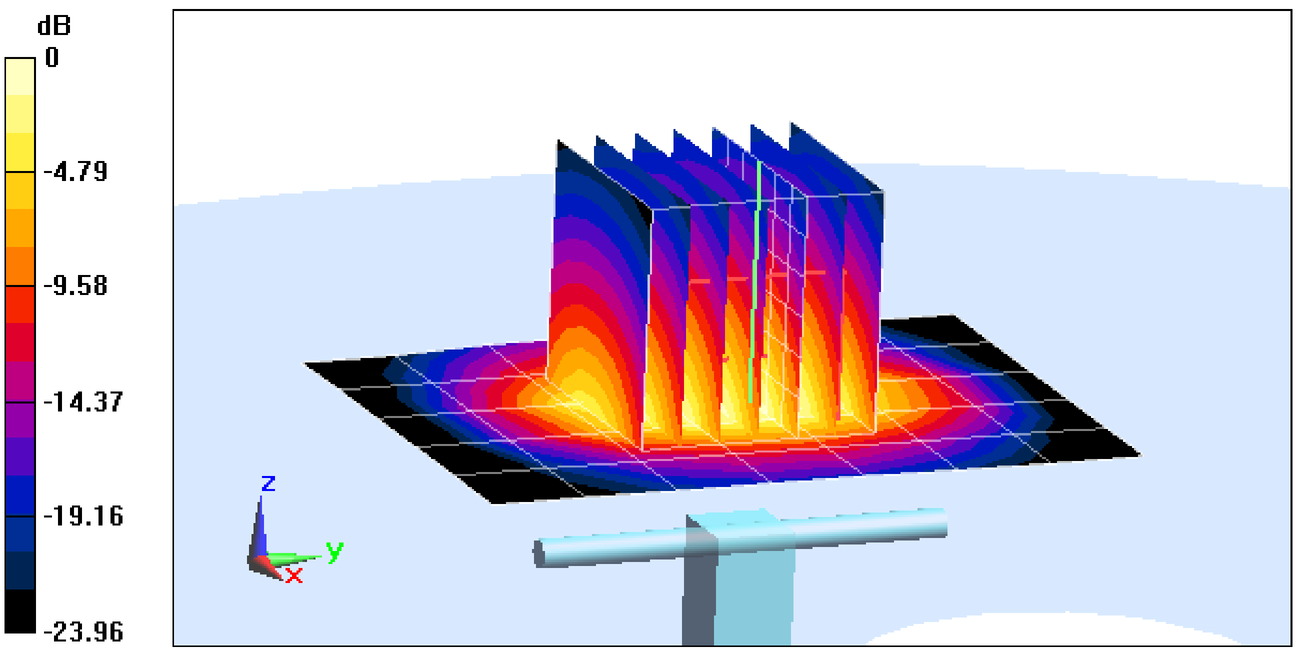
Communication System: CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used:
f = 2450 MHz; σ = 1.79 mho/m; ε_r = 37.41; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

2450MHz System Verification

Area Scan (6x8x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 5.16 mW/g; SAR(10 g) = 2.35 mW/g
Deviation = -4.09 %



0 dB = 6.700mW/g = 16.52 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 2450 MHz; Type: D2450V2; Serial: 719

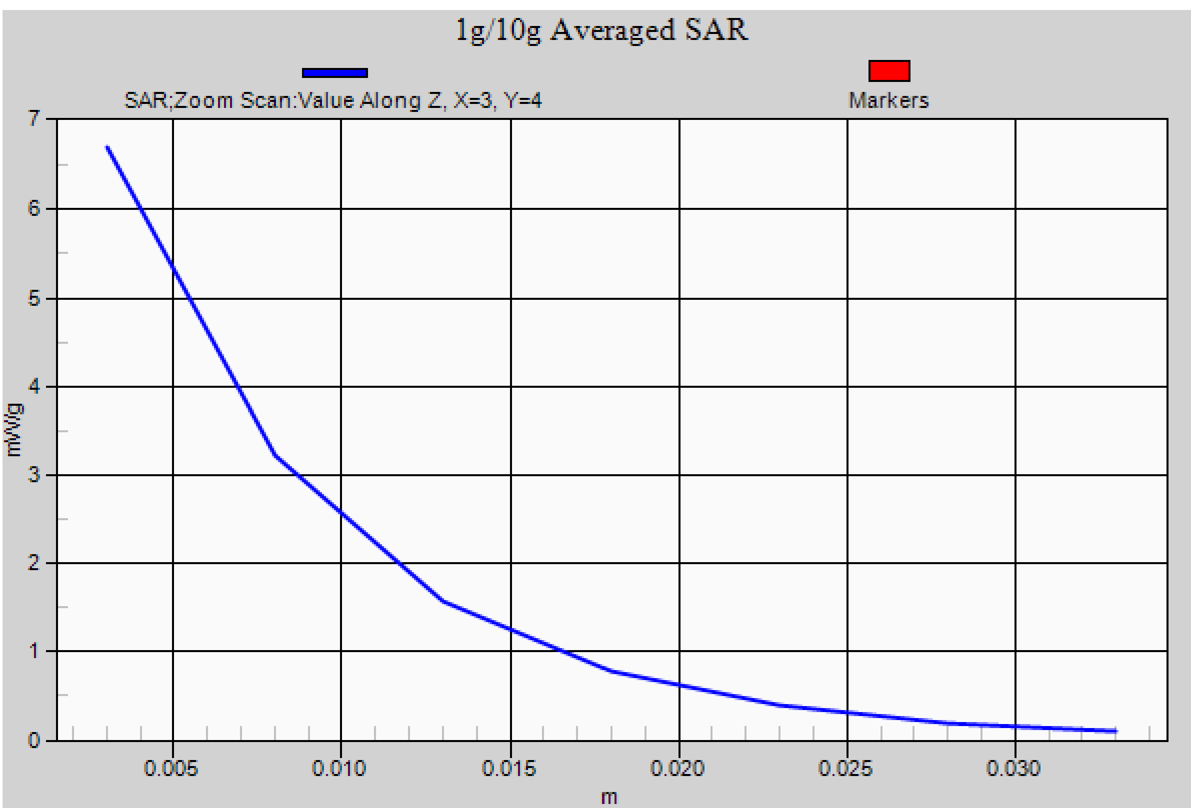
Communication System: CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: 2450 Head Medium parameters used:
f = 2450 MHz; σ = 1.79 mho/m; ε_r = 37.41; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-08-2012; Ambient Temp: 23.7°C; Tissue Temp: 22.1°C

Probe: ES3DV3 - SN3209; ConvF(4.46, 4.46, 4.46); Calibrated: 3/16/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1323; Calibrated: 2/15/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1114
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

2450MHz System Verification

Area Scan (6x8x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 5.16 mW/g; SAR(10 g) = 2.35 mW/g
Deviation = -4.09 %



PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 835 MHz; Type: D835V2; Serial: 4d026

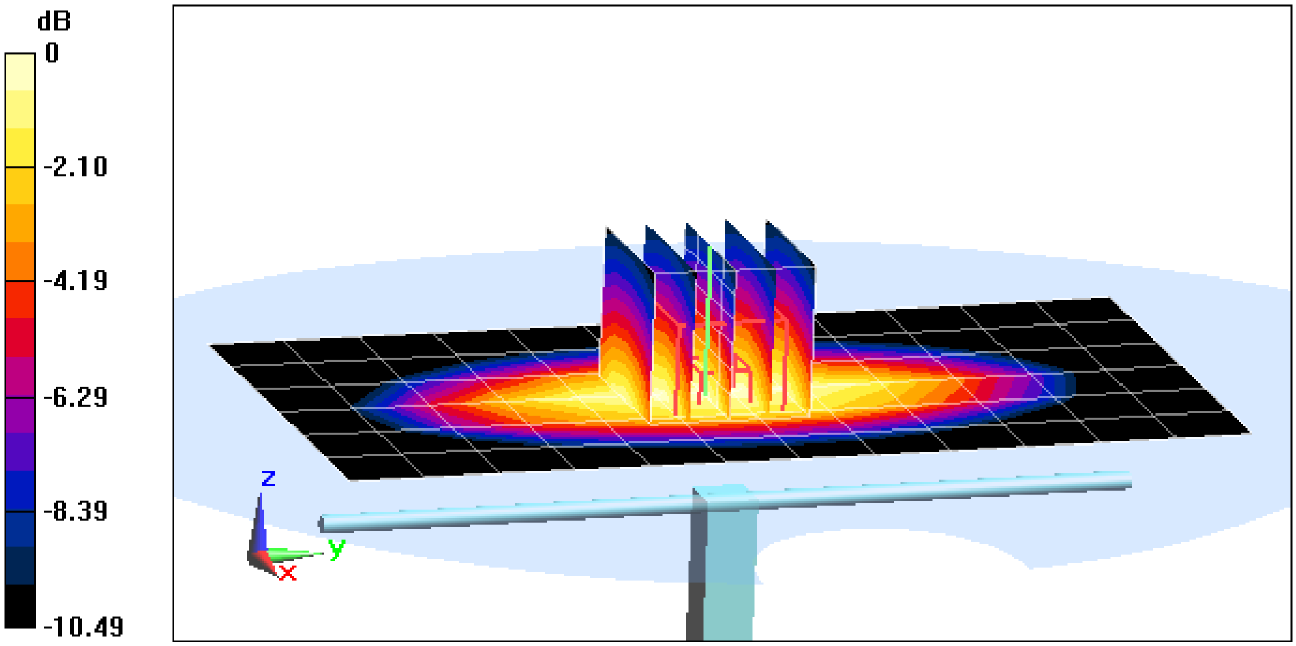
Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1
Medium: 835 Body Medium parameters used:
f = 835 MHz; σ = 0.993 mho/m; ε_r = 52.71; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-09-2012; Ambient Temp: 23.2°C; Tissue Temp: 23.1°C

Probe: ES3DV3 - SN3258; ConvF(6.06, 6.06, 6.06); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1406
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

835MHz System Verification

Area Scan (7x13x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 1.03 mW/g; SAR(10 g) = 0.678 mW/g
Deviation = 6.63 %



0 dB = 1.120mW/g = 0.98 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 835 MHz; Type: D835V2; Serial: 4d026

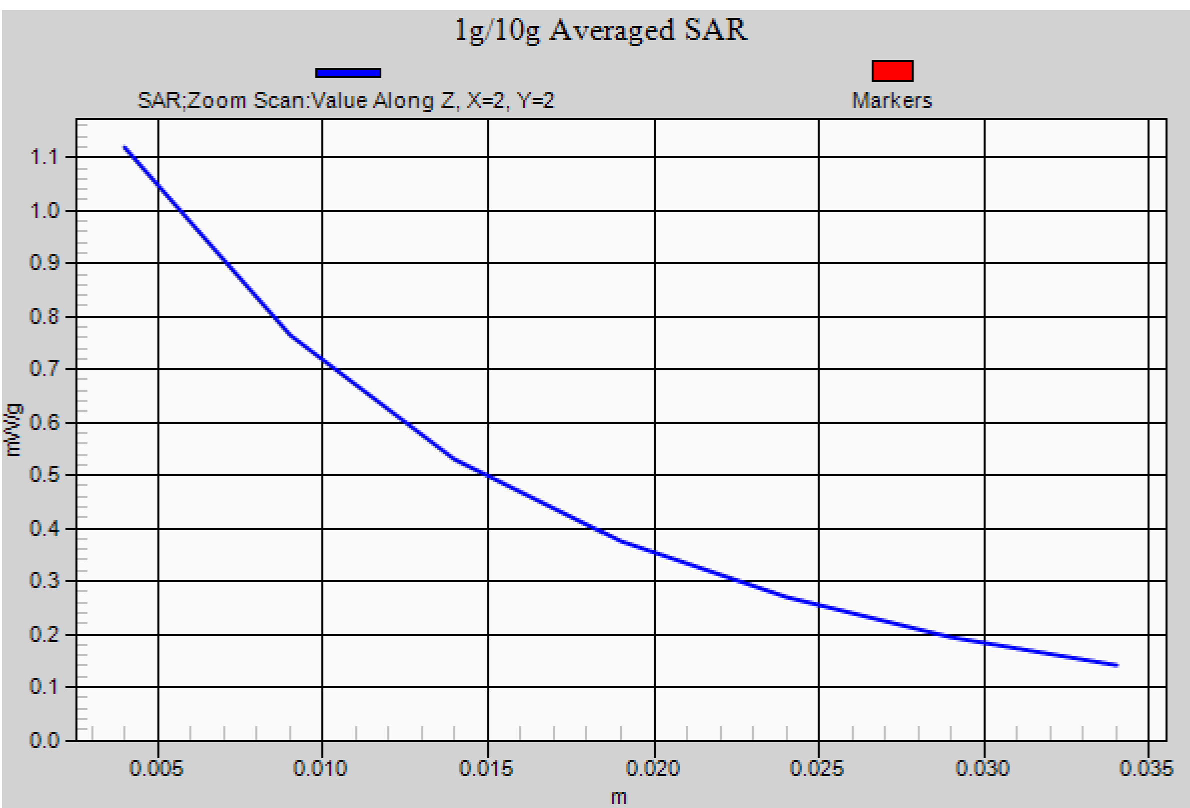
Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1
Medium: 835 Body Medium parameters used:
f = 835 MHz; $\sigma = 0.993$ mho/m; $\varepsilon_r = 52.71$; $\rho = 1000$ kg/m^3
Phantom section: Flat Section; Space: 1.5 cm

Test Date: 05-09-2012; Ambient Temp: 23.2°C; Tissue Temp: 23.1°C

Probe: ES3DV3 - SN3258; ConvF(6.06, 6.06, 6.06); Calibrated: 2/21/2012
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE4 Sn1272; Calibrated: 1/18/2012
Phantom: SAM Main; Type: SAM 4.0; Serial: TP-1406
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

835MHz System Verification

Area Scan (7x13x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 1.03 mW/g; SAR(10 g) = 0.678 mW/g
Deviation = 6.63 %



PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 5d149

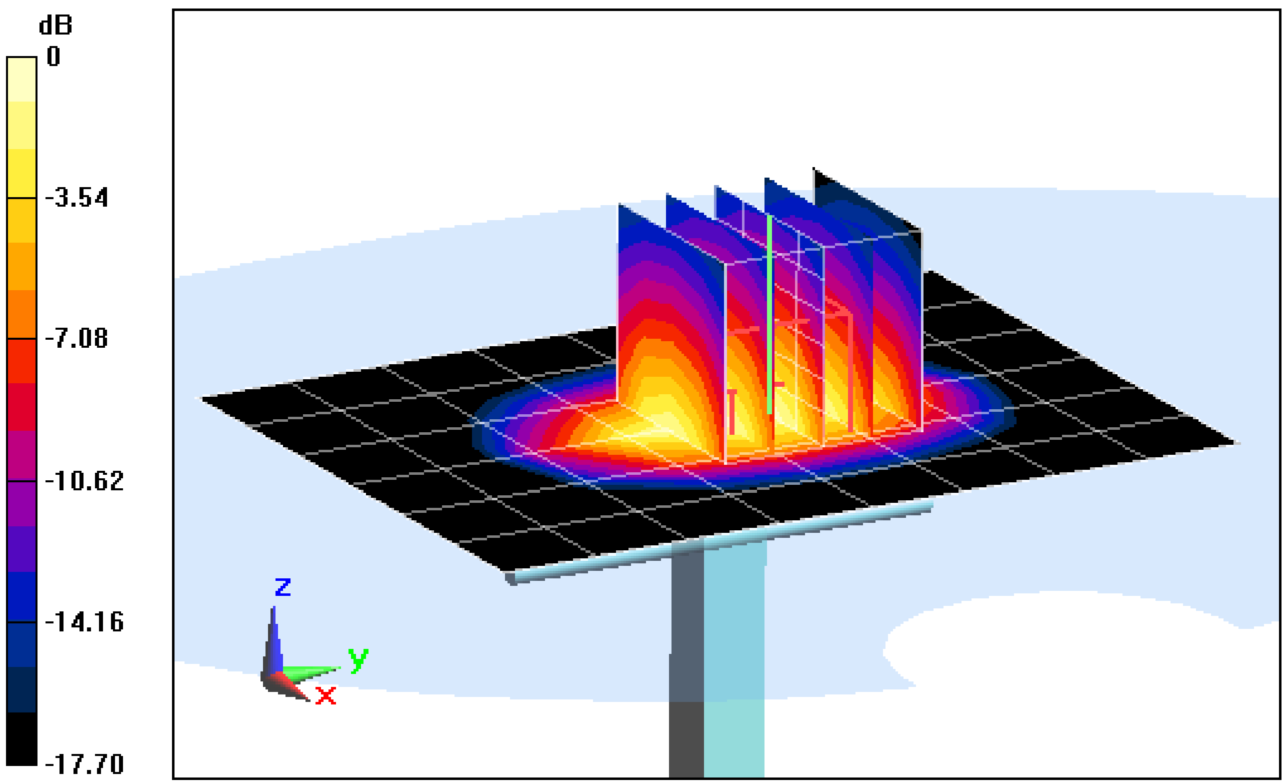
Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1
Medium: 1900 Body; Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.525 mho/m; ε_r = 51.893; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-08-2012; Ambient Temp: 24.4°C; Tissue Temp: 22.9°C

Probe: EX3DV4 - SN3561; ConvF(6.58, 6.58, 6.58); Calibrated: 7/27/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE3 Sn455; Calibrated: 11/9/2011
Phantom: SAM 5.0 front; Type: QD000P40CD; Serial: TP:-1648
Measurement SW: DASY52, Version 52.8 (0); SEMCAD X Version 14.6.4 (4989)

1900 MHz System Verification

Area Scan (7x9x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 4.23 mW/g; SAR(10 g) = 2.23 mW/g
Deviation = 7.63%



0 dB = 4.670mW/g = 13.39 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: SAR Dipole 1900 MHz; Type: D1900V2; Serial: 5d149

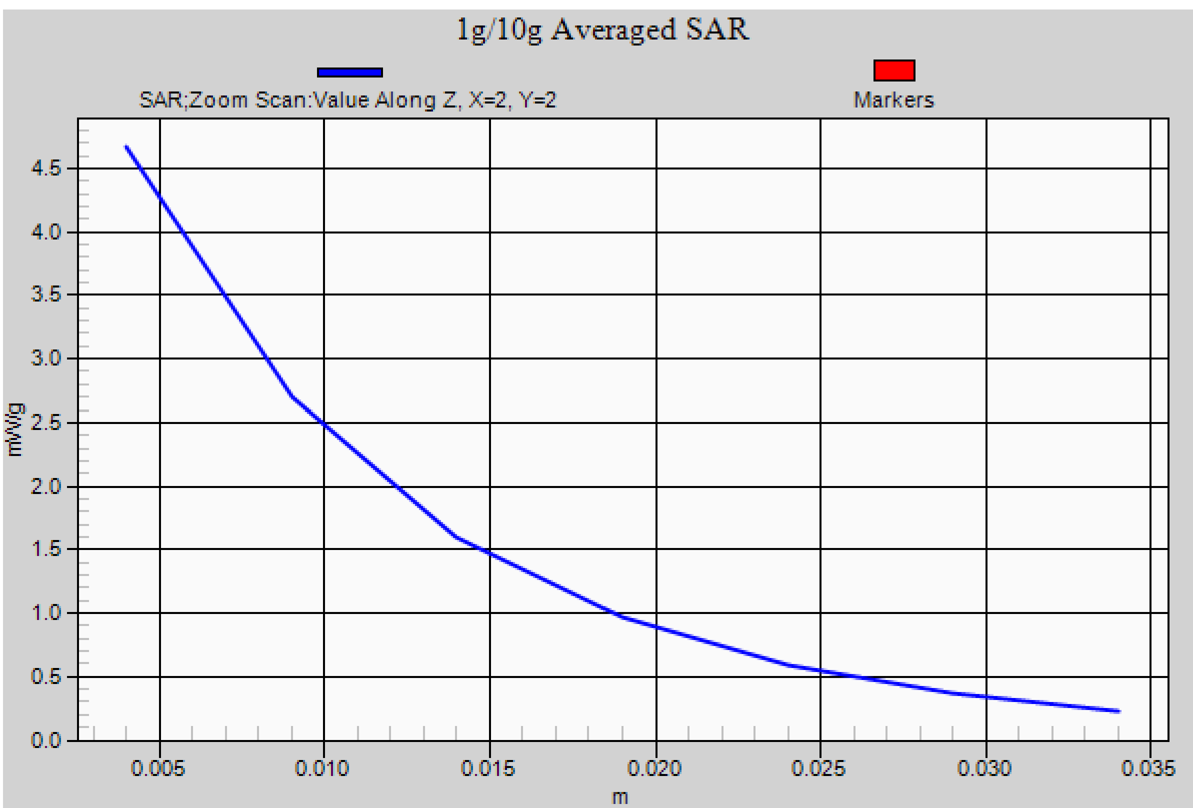
Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1
Medium: 1900 Body; Medium parameters used (interpolated):
f = 1900 MHz; σ = 1.525 mho/m; ε_r = 51.893; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-08-2012; Ambient Temp: 24.4°C; Tissue Temp: 22.9°C

Probe: EX3DV4 - SN3561; ConvF(6.58, 6.58, 6.58); Calibrated: 7/27/2011
Sensor-Surface: 4mm (Mechanical Surface Detection)
Electronics: DAE3 Sn455; Calibrated: 11/9/2011
Phantom: SAM 5.0 front; Type: QD000P40CD; Serial: TP:-1648
Measurement SW: DASY52, Version 52.8 (0); SEMCAD X Version 14.6.4 (4989)

1900 MHz System Verification

Area Scan (7x9x1): Measurement grid: dx=15mm, dy=15mm
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 4.23 mW/g; SAR(10 g) = 2.23 mW/g
Deviation = 7.63%



PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: 882

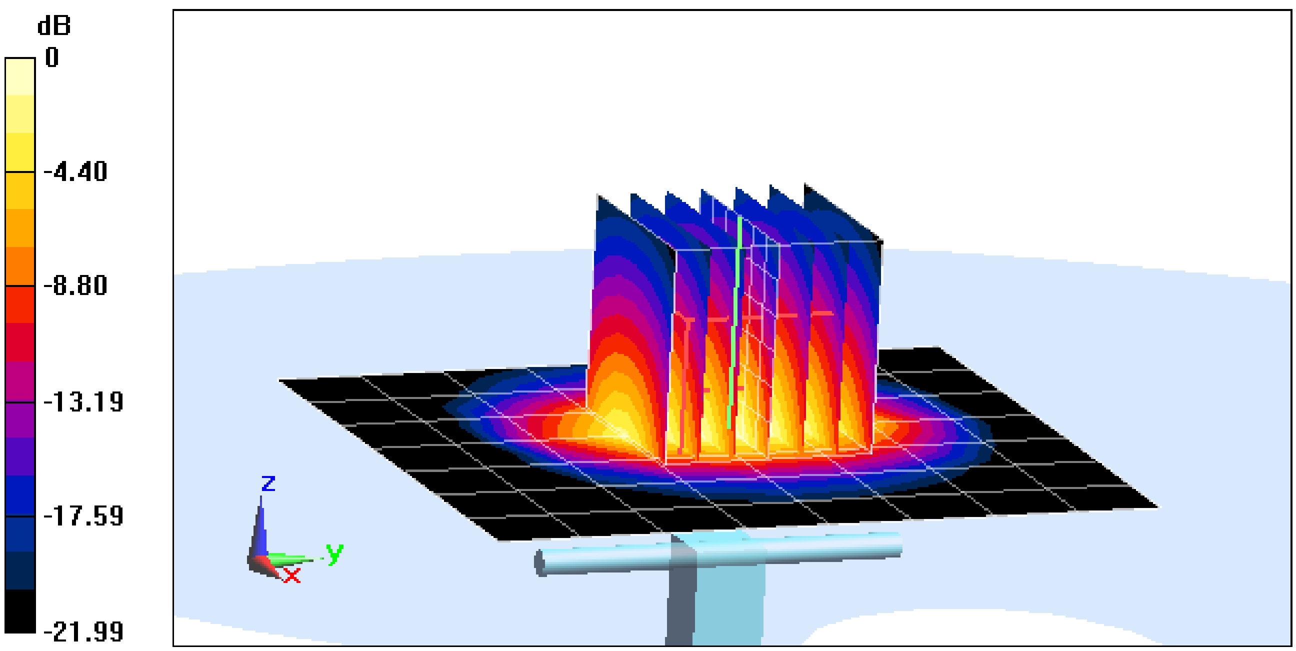
Communication System: CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: 2450 Body Medium parameters used:
f = 2450 MHz; σ = 1.907 mho/m; ε_r = 50.81; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-07-2012; Ambient Temp: 21.9°C; Tissue Temp: 21.7°C

Probe: ES3DV3 - SN3288; ConvF(4.47, 4.47, 4.47); Calibrated: 2/7/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn649; Calibrated: 2/20/2012
Phantom: SAM v5.0 front; Type: QD000P40CD; Serial: TP-1646
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

2450 MHz System Verification

Area Scan (8x9x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 5.24 mW/g; SAR(10 g) = 2.4 mW/g
Deviation = 4.17 %



0 dB = 6.920mW/g = 16.80 dB mW/g

PCTEST ENGINEERING LABORATORY, INC.

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: 882

Communication System: CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: 2450 Body Medium parameters used:
f = 2450 MHz; σ = 1.907 mho/m; ε_r = 50.81; ρ = 1000 kg/m^3
Phantom section: Flat Section; Space: 1.0 cm

Test Date: 05-07-2012; Ambient Temp: 21.9°C; Tissue Temp: 21.7°C

Probe: ES3DV3 - SN3288; ConvF(4.47, 4.47, 4.47); Calibrated: 2/7/2012
Sensor-Surface: 3mm (Mechanical Surface Detection)
Electronics: DAE4 Sn649; Calibrated: 2/20/2012
Phantom: SAM v5.0 front; Type: QD000P40CD; Serial: TP-1646
Measurement SW: DASY4, V4.7 Build 80; SEMCAD X Version 14.6.4 (4989)

2450 MHz System Verification

Area Scan (8x9x1): Measurement grid: dx=12mm, dy=12mm
Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Input Power = 20.0 dBm (100 mW)
SAR(1 g) = 5.24 mW/g; SAR(10 g) = 2.4 mW/g
Deviation = 4.17 %