

SAR EVALUATION REPORT

For

SHENZHEN COVALUE COMMUNICATIONS CO., LTD.

2/F, Bldg.24, XiLi Industrial Park, No.119Xinguang Rd, Xili, Nanshan

FCC ID: Y4GDR6000-2

Report Type: Product Type:

Original Report Two Way Radio

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Report Number: R2DG130807010-20A

Report Date: 2013-08-31

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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						
		Company Name SHENZHEN COVALUE COMMUNICATIONS CO., LTD.					
		EUT Description	Two Way Radio				
_	EUT rmation	FCC ID	Y4GDR6000-2				
		Model Number	DR7000-2				
		Test Date	2013-08-02 to 2013-08-03				
Mode	Frequency (MHz)		Max. SAR Level(s) Report	Limit (W/Kg)			
Digital	400-470	12.5kHz	Face up: 2.854 W/kg Body-Back: 4.723 W/kg	0			
Analog	400-470	12.5kHz	Face up: 2.788 W/kg (50% duty cycle) Body-Back: 4.381 W/kg (50% duty cycle)	8			
		ANSI / IEEE C95.1: 2005 IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fileds, 3 kHz to 300 GHz.					
		ANSI / IEEE C95.3: 2002 IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to SuchFields,100 kHz—300 GHz.					
Applicable Standards		IEEE1528:2003 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques					
		KDB procedures KDB 447498 D01 Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies KDB 643646 SAR Test Reduction Considerations for Occupational PTT Radios					

Note: This wireless device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled Exposure limits specified in ANSI/IEEE Standards and has been tested in accordance with the measurement procedures specified in IEEE 1528-2003 and RF exposure KDB procedures.

The results and statements contained in this report pertain only to the device(s) evaluated.

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision	
0	R2DG130807010-20A	Original Report	2013-08-31	

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EUT DESCRIPTION

This report has been prepared on behalf of SHENZHEN COVALUE COMMUNICATIONS CO.,LTD and their product, FCC ID:Y4GDR6000-2, Model: DR7000-2 or the EUT(Equipment Under Test) as referred to in the rest of this report. The EUT is a Two Way Radio.

Technical Specification

Product Type	Portable
Exposure Category:	Occupational/Controlled Exposure
Antenna Type(s):	External Antenna
Body-Worn Accessories:	Belt Clip and Headset Cable
Face-Head Accessories:	None
Modulation Type:	FM and 4FSK
Frequency Band:	400MHz-470MHz
Conducted RF Power:	36.58dBm
Dimensions (L*W*H):	280mm (L)×60mm (W)×35mm (H)
Power Source:	Rechargeable Li-ION Battery
Normal Operation:	Face Up and Body-worn

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REFERENCE, STANDARDS, AND GUILDELINES

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.

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SAR Limits

FCC Limit (1g Tissue)

	SAR (W/kg)			
EXPOSURE LIMITS	(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)

	SAR (W/kg)			
EXPOSURE LIMITS	(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.

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FACILITIES AND ACCREDITATION

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

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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 10mm2 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/m3 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 in the X & Y axis, and 35mm in the Z axis.

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ALSAS-10U Interpolation and Extrapolation Uncertainty

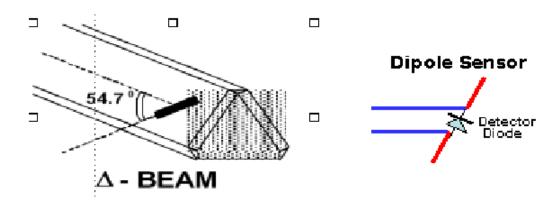
The overall uncertainty for the methodology and algorithms the used during the SAR calculation was evaluated using the data from IEEE 1528 based on the example f3 algorithm:

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

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.

$$V_{i} = U_{i} + U_{i}^{2} \cdot \frac{cf}{dcp_{i}}$$

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Isotropic E-Field Probe Specification

Calibration Method	Frequency Dependent Below 1 GHz Calibration in air performed in a TEM Cell Above 1 GHz Calibration in air performed in waveguide		
Sensitivity	$0.70 \ \mu V/(V/m)^2$ to $0.85 \ \mu V/(V/m)^2$		
Dynamic Range	0.0005 W/kg to 100 W/kg		
Isotropic Response	Better than 0.1 dB		
Diode Compression Point (DCP)	Calibration for Specific Frequency		
Probe Tip Diameter	< 2.9 mm		
Sensor Offset	1.56 (+/- 0.02 mm)		
Probe Length	289 mm		
Video Bandwidth	@ 500 Hz: 1 dB @ 1.02 kHz: 3 dB		
Boundary Effect	Less than 2.1% for distance greater than 0.58 mm		
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		

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 $5\mu V$ 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.

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

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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.



Robot/Controller Manufacturer	Thermo CRS	
Number of Axis	Six independently controlled axis	
Positioning Repeatability	0.05 mm	
Controller Type	Single phase Pentium based C500C	
Robot Reach	710 mm	
Communication	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.

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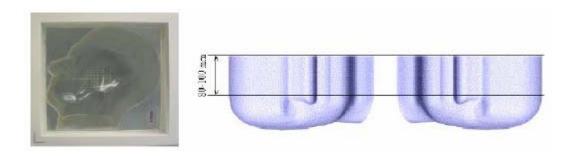


Phantom Types

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.



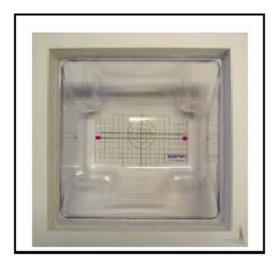
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APREL Laboratories Universal Phantom

The Universal Phantom is used on the ALSAS-10U as a system validation phantom. The Universal Phantom has been fully validated both experimentally from 800MHz to 6GHz and numerically using XFDTD numerical software.

The shell thickness is 2mm overall, with a 4mm spacer located at the NF/MB intersection providing an overall thickness of 6mm in line with the requirements of IEEE-1528.

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



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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.

Ingredients	Frequency (MHz)									
(% by weight)	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (Nacl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton x-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (s/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

Recommended Tissue Dielectric Parameters for Head and Body

Frequency	Head	Tissue	Body Tissue		
(MHz)	Er	O'(S/m)	Er	O (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	

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EQUIPMENT LIST AND CALIBRATION

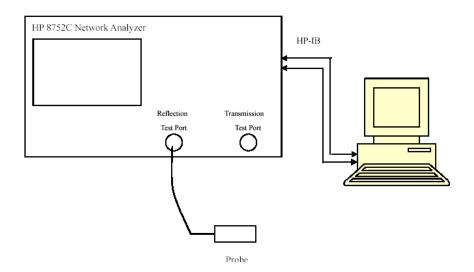
Equipments List & Calibration Information

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	2013-05-12	110-00212
Miniature E-Field Probe	E-020	2012-08-09	500-00283
Dipole, 450 MHz	ALS-D-450-S-2	2012-07-31	175-00503
Dipole Spacer	ALS-DS-U	N/A	250-00907
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-P-UP-1	N/A	150-00413
Simulated Tissue 450 MHz Head	ALS-TS-450-H	Each Time	260-01106
Simulated Tissue 450 MHz Body	ALS-TS-450-B	Each Time	260-02108
Power Amplifier	5S1G4	N/A	71377
Synthesized Sweeper	HP 8341B	2013-05-16	2624A00116
Signal Analyzer	FSIQ26	2012-08-08	8386001028

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SAR MEASUREMENT SYSTEM VERIFICATION

Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency	Liquid	Liquid Parameter		Target Value		Delta (%)		Tolerance
(MHz)	Type	ε _r	O'(S/m)	$\epsilon_{ m r}$	O'(S/m)	$\Delta \epsilon_{ m r}$	$\triangle O'(S/m)$	(%)
400.0125	Head	42.37	0.84	43.5	0.87	-2.598	-3.448	±5
400.0125	Body	55.64	0.92	56.7	0.94	-1.869	-2.128	±5
417.5000	Head	42.32	0.86	43.5	0.87	-2.713	-1.149	±5
	Body	55.67	0.91	56.7	0.94	-1.817	-3.191	±5
435.0125	Head	42.33	0.87	43.5	0.87	-2.690	0.000	±5
455.0125	Body	55.71	0.90	56.7	0.94	-1.746	-4.255	±5
452.5000	Head	42.29	0.89	43.5	0.87	-2.782	2.299	±5
432.3000	Body	55.74	0.91	56.7	0.94	-1.693	-3.191	±5
469.9875	Head	42.16	0.90	43.5	0.87	-3.080	3.448	±5
409.9073	Body	55.78	0.92	56.7	0.94	-1.623	-2.128	±5

^{*}Liquid Verification was performed on 2013-08-02.

Please refer to the following tables.

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450 Head			450 Body				
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''		
400.0	42.374032	37.906936	400.0	55.635164	41.476502		
401.5	42.343003	37.831489	401.5	55.638302	41.176013		
403.0	42.326343	37.756012	403.0	55.641435	40.988531		
404.5	42.221203	37.680543	404.5	55.644578	40.800965		
406.0	42.239561	37.605101	406.0	55.647716	40.636027		
407.5	42.261454	37.529601	407.5	55.650854	40.399758		
409.0	42.237941	37.454129	409.0	55.653992	40.314257		
410.5	42.285262	37.378661	410.5	55.657130	40.092393		
412.0	42.304868	37.303189	412.0	55.660268	40.026955		
413.5	42.311294	37.227729	413.5	55.663406	39.784378		
415.0	42.362225	37.152263	415.0	55.666544	39.588533		
416.5	42.310718	37.076792	416.5	55.669682	39.431362		
418.0	42.347086	37.001315	418.0	55.672820	39.309259		
419.5	42.307115	36.925845	419.5	55.675958	39.173647		
421.0	42.280113	36.850375	421.0	55.679096	39.058822		
422.5	42.299668	36.774915	422.5	55.682234	38.866246		
424.0	42.261486	36.699445	424.0	55.685372	38.843910		
425.5	42.236310	36.623975	425.5	55.688510	38.720609		
427.0	42.276846	36.548505	427.0	55.691648	39.050842		
428.5	42.308265	36.473035	428.5	55.694786	38.365440		
430.0	42.305690	36.397565	430.0	55.694924	38.217297		
431.5	42.304270	36.322105	431.5	55.701062	38.010259		
433.0	42.329099	36.246635	433.0	55.704200	37.853718		
434.5	42.330099	36.171165	434.5	55.707338	37.601425		
436.0	42.333699	36.095695	436.0	55.710476	37.408348		
437.5	42.318731	36.020225	437.5	55.713614	37.266155		
439.0	42.305528	35.944755	439.0	55.716752	37.193238		
440.5	42.299735	35.869285	440.5	55.719890	37.129504		
442.0	42.322908	35.793825	442.0	55.723028	37.013787		
443.5	42.281438	35.718355	443.5	55.726166	36.928991		
445.0	42.271369	35.642885	445.0	55.729304	36.751003		
446.5	42.273839	35.567415	446.5	55.732442	36.585961		
448.0	42.284906	35.491945	448.0	55.735579	36.553104		
449.5	42.274268	35.416475	449.5	55.738717	36.398468		
451.0	42.257540	35.341015	451.0	55.741855	36.353596		
452.5	42.286982	35.265545	452.5	55.744993	36.190333		
454.0	42.288684	35.190075	454.0	55.748131	36.066173		
455.5	42.292380	35.114605	455.5	55.751269	36.034686		
457.0	42.286475	35.039135	457.0	55.754407	35.895084		
458.5	42.210178	34.963665	458.5	55.757545	35.850595		
460.0	42.286430	34.888195	460.0	55.760683	35.668253		
461.5	42.240721	34.812735	461.5	55.763821	35.594160		
463.0	42.166739	34.737265	463.0	55.766959	35.503578		
464.5	42.182041	34.661795	464.5	55.770097	35.449964		
466.0	42.136624	34.586325	466.0	55.773235	35.322965		
467.5	42.177563	34.510855	467.5	55.776373	35.184369		
469.0	42.157832	34.435385	469.0	55.779511	35.133228		
470.5	42.161016	34.359925	470.5	55.782649	35.053529		
472.0	42.134618	34.284455	472.0	55.785787	34.943686		
473.5	42.139213	34.208985	 473.5	55.788925	34.821770		
475.0	42.099481	34.133515	475.0	55.792063	34.721952		

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System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of $\pm 10\%$. The validation 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 dipole antenna List and Detail

Manufa cturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date	
APREL	Probe	ALS-E-020	500-00283	2012-08-08	2013-08-07	
APREL	Dipole antenna(450MHz)	ALS-D-450-S-2	175-00503	2012-07-31	2015-07-30	

System Accuracy Check Results

Date	Frequency (MHz)	Liquid Type	Measured SAR (W/Kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2013-08-02 450	450	Head	1g	4.682	4.572	2.406	±10
	450	Body	1g	4.594	4.508	1.908	±10

^{*}All SAR values are normalized to 1 Watt forward power.

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SAR SYSTEM VALIDATION DATA

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

System Performance Check 450 MHz Head Liquid

Dipole 450 MHz; Type: ALS-D-450-S-2; S/N: 175-00503

Product Data

Device Name : Dipole 450 MHz
Serial No. : 175-00503
Type : Dipole

Model : ALS-D-450-S-2

Frequency Band : 450

Max. Transmit Pwr
Drift Time : 3 min(s)
Power Drift-Start : 4.493 W/kg
Power Drift-Finish
Power Drift (%) : -2.804

Phantom Data

Name : APREL-Uni
Type : Uni-Phantom
Size (mm) : 280 x 280 x 200
Serial No. : System Default

Location : Center Description : Default

Phantom Data

Tissue Data

: Head Type : 260-01016 Serial No. Frequency : 450.00MHz Last Calib. Date : 02-Aug-2013 Temperature : 20.00 °C Ambient Temp. : 21.00 °C Humidity : 56.00 RH% Epsilon : 42.27 F/m Sigma : 0.89 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 : 09-Aug-2012

Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

Measurement Data

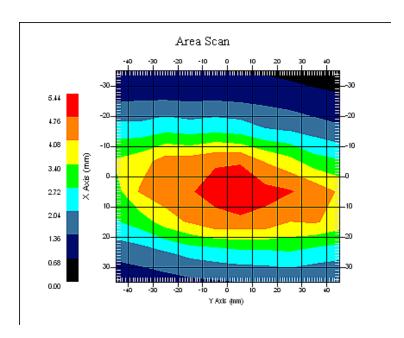
Crest Factor : 1

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

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1 gram SAR value : 4.682 W/kg 10 gram SAR value : 2.829 W/kg Area Scan Peak SAR : 5.152 W/kg Zoom Scan Peak SAR : 8.763 W/kg



450 MHz System Validation with Head Tissue

SAR Evaluation Report 21 of 70

System Performance Check 450 MHz Body Liquid

Dipole 450 MHz; Type: ALS-D-450 -S-2; S/N: 175-00503

Product Data

Device Name : Dipole 450 MHz Serial No. : 175-00503 Type : Dipole

Model : ALS-D-450-S-2

Frequency Band : 450
Max. Transmit Pwr
Drift Time : 3 min(s)
Power Drift-Start : 4.692 W/kg
Power Drift-Finish
Power Drift (%) : -2.742

Phantom Data

Name : APREL-Uni Type : Uni-Phantom Size (mm) : 280 x 280 x 200 Serial No. : System Default

Location : Center Description : Default

Phantom Data

Tissue Data

Type : Body : 260-02018 Serial No. Frequency : 450.00MHz Last Calib. Date : 02-Aug-2013 : 20.00 °C Temperature Ambient Temp. : 21.00 °C : 56.00 RH% Humidity : 55.74 F/m Epsilon Sigma : 0.91 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 : 09-Aug-2012

Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2 Compression Point : 95.00 mV

Compression Point : 95.00 mV Offset : 1.56 mm

Measurement Data

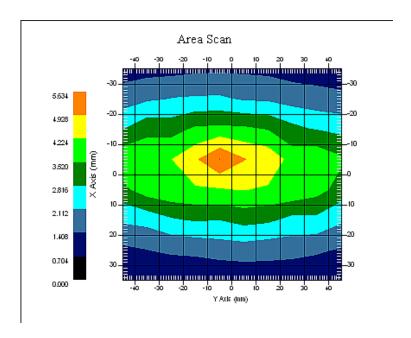
Crest Factor : 1

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

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1 gram SAR value : 4.594 W/kg 10 gram SAR value : 2.851 W/kg Area Scan Peak SAR : 5.184 W/kg Zoom Scan Peak SAR : 8.276 W/kg



450 MHz System Validation with Body Tissue

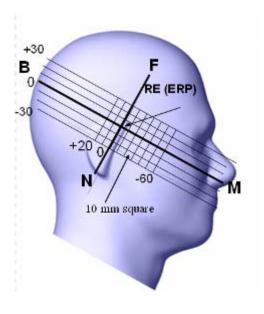
SAR Evaluation Report 23 of 70

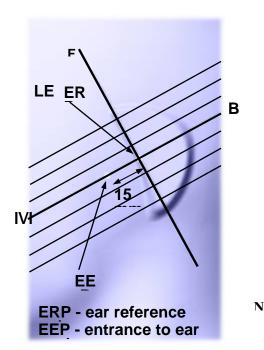
EUT TEST STRATEGY AND METHODOLOGY

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:





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Cheek/Touch Position

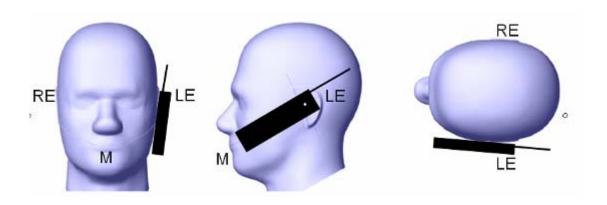
The device is brought toward the mouth of the head phantom by pivoting against the "ear reference point" or along the "N-F" line for the SCC-34/SC-2 head phantom.

This test position is established:

- When any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom.
- o (or) When any portion of a foldout, sliding or similar keypad cover opened to its intended self-adjusting normal use position is in contact with the cheek or mouth of the phantom.

For existing head phantoms – when the handset loses contact with the phantom at the pivoting point, rotation should continue until the device touches the cheek of the phantom or breaks its last contact from the ear spacer.

Cheek / Touch Position



Ear/Tilt Position

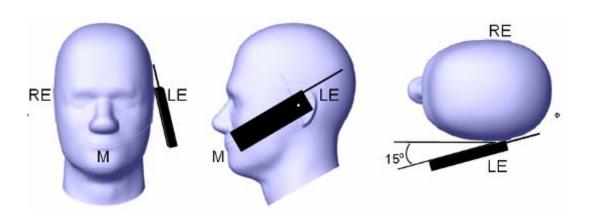
With the handset aligned in the "Cheek/Touch Position":

- 1) If the earpiece of the handset is not in full contact with the phantom's ear spacer (in the "Cheek/Touch position") and the peak SAR location for the "Cheek/Touch" position is located at the ear spacer region or corresponds to the earpiece region of the handset, the device should be returned to the "initial ear position" by rotating it away from the mouth until the earpiece is in full contact with the ear spacer.
- 2) (otherwise) The handset should be moved (translated) away from the cheek perpendicular to the line passes through both "ear reference points" (note: one of these ear reference points may not physically exist on a split head model) for approximate 2-3 cm. While it is in this position, the device handset is tilted away from the mouth with respect to the "test device reference point" until the inside angle between the vertical centerline on the front surface of the phone and the horizontal line passing through the ear reference point isby 15 80°. After the tilt, it is then moved (translated) back toward the head perpendicular to the line passes through both "ear reference points" until the device touches the phantom or the ear spacer. If the antenna touches the head first, the positioning process should be repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously. This test position may require a device holder or positioner to achieve the translation and tilting with acceptable positioning repeatability.

SAR Evaluation Report 25 of 70

If a device is also designed to transmit with its keypad cover closed for operating in the head position, such positions should also be considered in the SAR evaluation. The device should be tested on the left and right side of the head phantom in the "Cheek/Touch" and "Ear/Tilt" positions. When applicable, each configuration should be tested with the antenna in its fully extended and fully retracted positions. These test configurations should be tested at the high, middle and low frequency channels of each operating mode; for example, AMPS, CDMA, and TDMA. If the SAR measured at the middle channel for each test configuration (left, right, Cheek/Touch, Tile/Ear, extended and retracted) is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

Ear /Tilt 15° Position



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.

SAR Evaluation Report 26 of 70

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.

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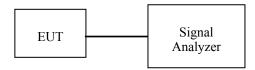
CONDUCTED OUTPUT POWER MEASUREMENT

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.



PTT

Maximum Output Power among production units

Max Target Power for Production Unit (dBm)								
PTT/Mode	Frequency							
	400.0125	417.5000	435.0125	452.5000	469.9875			
Analog-12.5K	36.80	36.80	36.80	36.80	36.80			
Digital	36.80	36.80	36.80	36.80	36.80			

Test Results:

Mode	Frequency Spacing (kHz)	Frequency (MHz)	Output(dBm)	Output Power(W)	Power level
	Digital 12.5	400.0125	36.19	4.159	High
		417.5000	36.32	4.285	High
Digital		435.0125	36.53	4.498	High
		452.5000	36.19	4.159	High
		469.9875	36.41	4.375	High

Mode	Frequency Spacing (kHz)	Frequency (MHz)	Output(dBm)	Output Power(W)	Power level
		400.0125	36.16	4.130	High
	12.5	417.5000	36.34	4.305	High
Analog		435.0125	36.58	4.550	High
		452.5000	36.55	4.519	High
		469.9875	36.46	4.426	High

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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 Sandy Wang on 2013-8-02 to 2013-8-03.

Test Result:

Digital (Modulation 4FSK; Channel Spacing 12.5 kHz):

EUT	Fraguanay	Power Drift	Max. Meas.	Max. Rated	1 g SAR Value (W/Kg)			
Position	Frequency (MHz)	(%)	Power (dBm)	Power (dBm)	Scaled Factor	Meas. SAR	Scaled SAR	
Face up (2.5cm)	435.0125	-2.738	36.53	36.80	1.064	2.682	2.854	
	400.0125	0.807	36.19	36.80	1.151	3.982	4.583	
	417.5000	3.590	36.32	36.80	1.117	3.756	4.195	
Body-Back (0.0cm)	435.0125	-3.170	36.53	36.80	1.064	4.439	4.723	
(0.00111)	452.5000	2.416	36.19	36.80	1.151	2.905	3.344	
	469.9875	-1.629	36.41	36.80	1.094	3.354	3.669	

Note:

- 1. When the 1-g SAR tested using the default battery and default accessories is ≤ 3.5W/Kg, testing for other channels are optional.
- 2. When 1-g SAR tested using the default battery and default accessories is ≤ 4.0W/Kg, the test using additional batteries is only required for the configuration that resulted in the highest SAR among previous test.
- 3. When the 1-g SAR is > 6.0 W/kg, test additional battery and antenna combination with the default body-worn and audio accessory on all required channels.
- 4. Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios.

SAR Evaluation Report 29 of 70

Analog (Modulation FM; Channel Spacing 12.5 kHz):

EUT	Frequency	Power Drift	Max. Meas.	Max. Rated	1 g SAR Value (W/Kg)				
Position	(MHz)	(%)	Power (dBm)	Power (dBm)	Scaled Factor	Meas. SAR	Scaled SAR	50% Duty Cycle	
Face up (2.5cm)	435.0125	0.772	36.58	36.80	1.052	5.300	5.576	2.788	
	400.0125	3.098	36.16	36.80	1.159	7.559	8.761	4.381	
	417.5000	3.107	36.34	36.80	1.112	6.751	7.507	3.754	
Body-Back (0.0cm)	435.0125	-2.455	36.58	36.80	1.052	7.611	8.007	4.004	
(0.0011)	452.5000	-0.981	36.55	36.80	1.059	6.584	6.972	3.486	
	469.9875	-1.114	36.46	36.80	1.081	6.888	7.446	3.723	

Note:

- 1. When the 1-g SAR (50% duty cycle) tested using the default battery and default accessories is \leq 3.5W/Kg, testing for other channels are optional.
- 2. Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios.
- 3. 50% duty cycle applies to FM Modulation.

SAR Evaluation Report 30 of 70

EUT SCAN RESULTS

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

Face-Up 2.5cm (Digital 12.5k-435.0125 MHz);

Measurement Data

Modulation mode : 4FSK
Crest Factor : 2
Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 2.593 W/kg Power Drift-Finish : 2.522 W/kg Power Drift (%) : -2.738

Tissue Data

Type : Head

Frequency : 435.0125 MHz
Epsilon : 42.33 F/m
Sigma : 0.87 S/m
Density : 1000.00 kg/cu. m

Probe Data

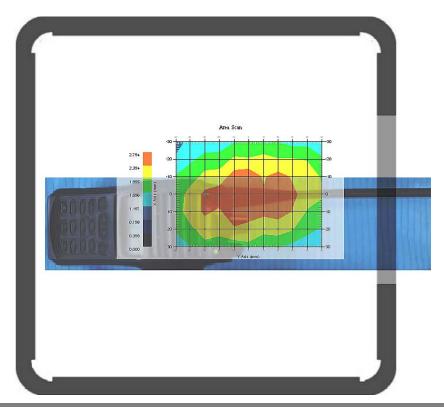
Serial No. : 500-00283
Frequency Band : 450
Duty Cycle Factor : 2
Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 2.682 W/kg 10 gram SAR value : 1.899 W/kg Area Scan Peak SAR : 2.794 W/kg Zoom Scan Peak SAR : 4.323 W/kg

Plot 2#



SAR Evaluation Report 31 of 70

Body-Back 0.0cm (Digital 12.5k-400.0125 MHz);

Measurement Data

Modulation mode : 4FSK
Crest Factor : 2
Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 3.593 W/kg Power Drift-Finish : 3.622 W/kg Power Drift (%) : 0.807

Tissue Data

Type : Body

Frequency : 400.0125 MHz
Epsilon : 55.64 F/m
Sigma : 0.92 S/m
Density : 1000.00 kg/cu. m

Probe Data

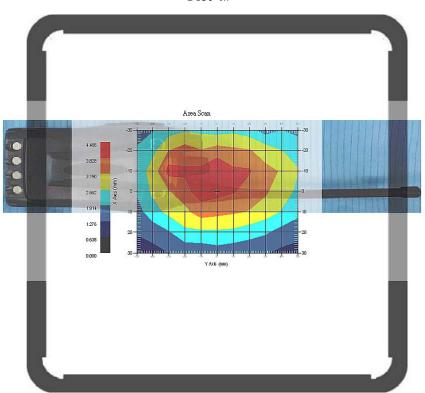
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 2 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 3.982 W/kg 10 gram SAR value : 3.062 W/kg Area Scan Peak SAR : 4.463 W/kg Zoom Scan Peak SAR : 5.925 W/kg

Plot 4#



SAR Evaluation Report 32 of 70

Body-Back 0.0cm (Digital 12.5k-417.5000 MHz);

Measurement Data

Modulation mode : 4FSK
Crest Factor : 2
Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 3.593 W/kg Power Drift-Finish : 3.722 W/kg Power Drift (%) : 3.590

Tissue Data

Type : Body

Frequency : 417.5000 MHz
Epsilon : 55.67F/m
Sigma : 0.91 S/m
Density : 1000.00 kg/cu. m

Probe Data

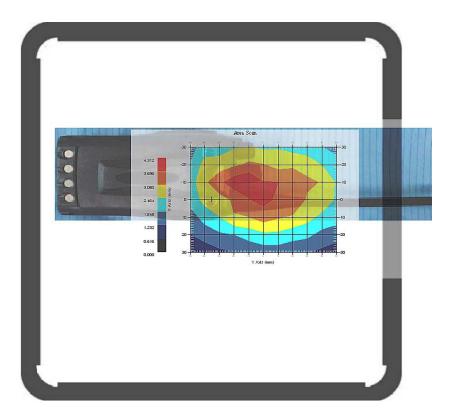
Serial No. : 500-00283
Frequency Band : 450
Duty Cycle Factor : 2
Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 3.756 W/kg 10 gram SAR value : 2.966 W/kg Area Scan Peak SAR : 4.309 W/kg Zoom Scan Peak SAR : 5.955 W/kg

Plot 5#



SAR Evaluation Report 33 of 70

Body-Back 0.0cm (Digital 12.5k-435.0125 MHz);

Measurement Data

Modulation mode : 4FSK Crest Factor : 2

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 4.890 W/kg Power Drift-Finish : 4.735 W/kg Power Drift (%) : -3.170

Tissue Data

Type : Body

Frequency : 435.0125 MHz
Epsilon : 55.71 F/m
Sigma : 0.91 S/m
Density : 1000.00 kg/cu. m

Probe Data

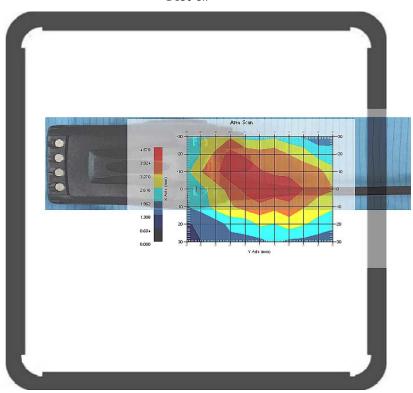
Serial No. : 500-00283
Frequency Band : 450
Duty Cycle Factor : 2
Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 4.439 W/kg 10 gram SAR value : 2.824 W/kg Area Scan Peak SAR : 4.578 W/kg Zoom Scan Peak SAR : 6.575 W/kg

Plot 6#



SAR Evaluation Report 34 of 70

Body-Back 0.0cm (Digital 12.5k-452.5000 MHz);

Measurement Data

Modulation mode : 4FSK Crest Factor : 2

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 2.503 W/kg Power Drift-Finish : 2.562 W/kg Power Drift (%) : 2.416

Tissue Data

Type : Body

Frequency : 452.5000 MHz
Epsilon : 55.74F/m
Sigma : 0.91 S/m
Density : 1000.00 kg/cu. m

Probe Data

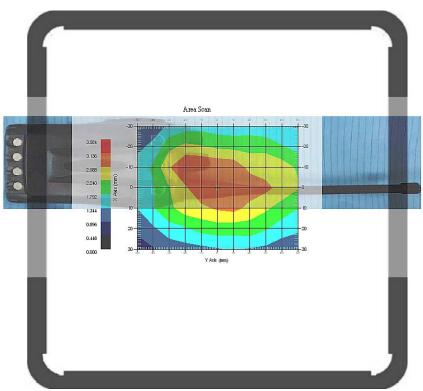
Serial No. : 500-00283
Frequency Band : 450
Duty Cycle Factor : 2
Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 2.905 W/kg 10 gram SAR value : 2.096 W/kg Area Scan Peak SAR : 3.139 W/kg Zoom Scan Peak SAR : 4.333 W/kg

Plot 7#



SAR Evaluation Report 35 of 70

Body-Back 0.0cm (Digital 12.5k-469.9875 MHz);

Measurement Data

Modulation mode : 4FSK
Crest Factor : 2
Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 3.001 W/kg Power Drift-Finish : 2.952 W/kg Power Drift (%) : -1.626

Tissue Data

Type : Body

Frequency : 469.9875 MHz
Epsilon : 55.78F/m
Sigma : 0.92 S/m
Density : 1000.00 kg/cu. m

Probe Data

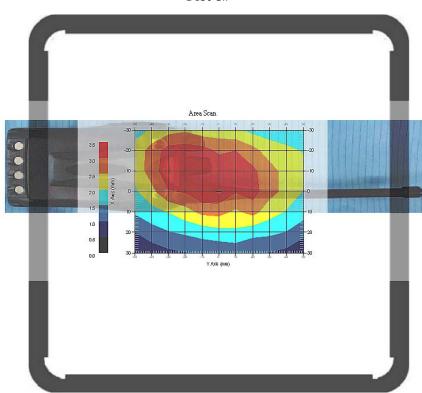
Serial No. : 500-00283
Frequency Band : 450
Duty Cycle Factor : 2
Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 3.354 W/kg 10 gram SAR value : 2.528 W/kg Area Scan Peak SAR : 3.498 W/kg Zoom Scan Peak SAR : 4.814 W/kg

Plot 8#



SAR Evaluation Report 36 of 70

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

Face-Up 2.5cm (Analog 12.5k-435.0125 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 5.182 W/kg Power Drift-Finish : 5.222 W/kg Power Drift (%) : 0.772

Tissue Data

Type : Head

Frequency : 435.0125 MHz
Epsilon : 42.33 F/m
Sigma : 0.87 S/m
Density : 1000.00 kg/cu. m

Probe Data

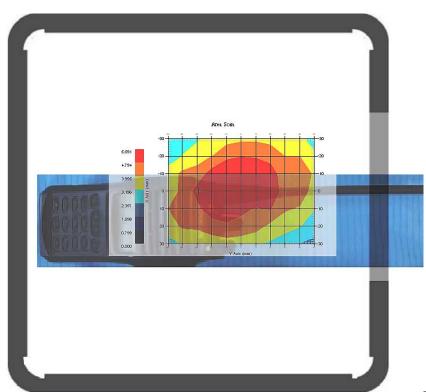
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 5.300 W/kg 10 gram SAR value : 3.922 W/kg Area Scan Peak SAR : 5.591 W/kg Zoom Scan Peak SAR : 7.477 W/kg

Plot 10#



SAR Evaluation Report 37 of 70

Body-Back 0.0cm (Analog 12.5k-400.0125 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 7.005 W/kg Power Drift-Finish : 7.222 W/kg Power Drift (%) : 3.098

Tissue Data

Type : Body

Frequency : 400.0125 MHz
Epsilon : 55.64 F/m
Sigma : 0.92 S/m
Density : 1000.00 kg/cu. m

Probe Data

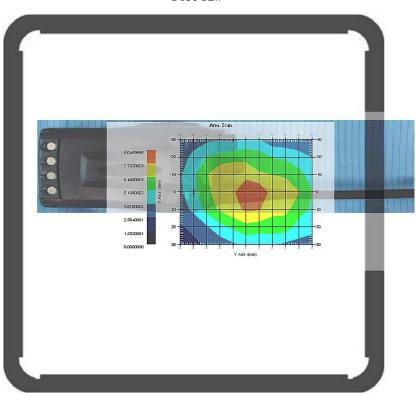
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 7.559 W/kg 10 gram SAR value : 5.555 W/kg Area Scan Peak SAR : 9.046 W/kg Zoom Scan Peak SAR : 9.989 W/kg

Plot 12#



SAR Evaluation Report 38 of 70

Body-Back 0.0cm (Analog 12.5k-417.5000 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 7.005 W/kg Power Drift-Finish : 7.225 W/kg Power Drift (%) : 3.107

Tissue Data

Type : Body

Frequency : 417.5000 MHz
Epsilon : 55.67F/m
Sigma : 0.91 S/m
Density : 1000.00 kg/cu. m

Probe Data

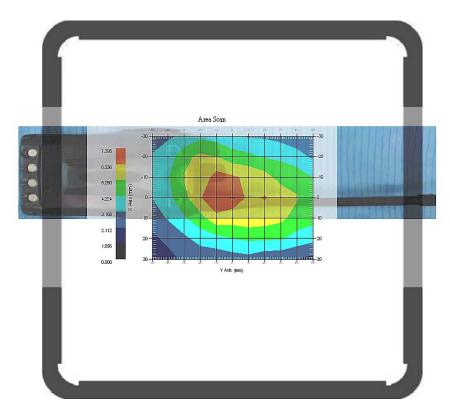
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 6.751 W/kg 10 gram SAR value : 5.026 W/kg Area Scan Peak SAR : 7.393 W/kg Zoom Scan Peak SAR : 11.311 W/kg

Plot 13#



SAR Evaluation Report 39 of 70

Body-Back 0.0cm (Analog 12.5k-435.0125 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 6.993 W/kg Power Drift-Finish : 6.822 W/kg Power Drift (%) : -2.455

Tissue Data

Type : Body

Frequency : 435.0125 MHz
Epsilon : 55.71F/m
Sigma : 0.90 S/m
Density : 1000.00 kg/cu. m

Probe Data

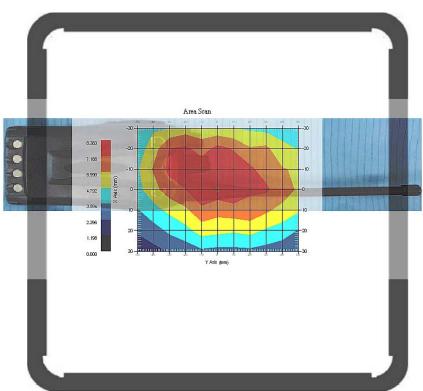
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 7.611 W/kg 10 gram SAR value : 6.026 W/kg Area Scan Peak SAR : 8.383 W/kg Zoom Scan Peak SAR : 13.311 W/kg

Plot 14#



SAR Evaluation Report 40 of 70

Body-Back 0.0cm (Analog 12.5k-452.5000 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 6.425 W/kg Power Drift-Finish : 6.362 W/kg Power Drift (%) : -0.981

Tissue Data

Type : Body

 Frequency
 : 452.5000 MHz

 Epsilon
 : 55.74F/m

 Sigma
 : 0.91 S/m

 Density
 : 1000.00 kg/cu. m

Probe Data

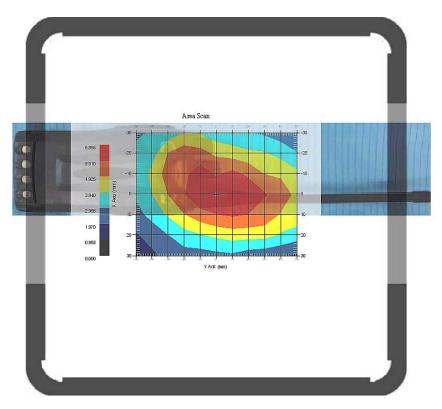
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 6.584 W/kg 10 gram SAR value : 5.019 W/kg Area Scan Peak SAR : 6.695 W/kg Zoom Scan Peak SAR : 8.507 W/kg

Plot 15#



SAR Evaluation Report 41 of 70

Body-Back 0.0cm (Analog 12.5k-469.9875 MHz);

Measurement Data

Modulation mode : FM Crest Factor : 1

Scan Type : Complete

Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm

Power Drift-Start : 6.732 W/kg Power Drift-Finish : 6.657 W/kg Power Drift (%) : -1.114

Tissue Data

Type : Body

Frequency : 469.9875 MHz
Epsilon : 55.78F/m
Sigma : 0.92 S/m
Density : 1000.00 kg/cu. m

Probe Data

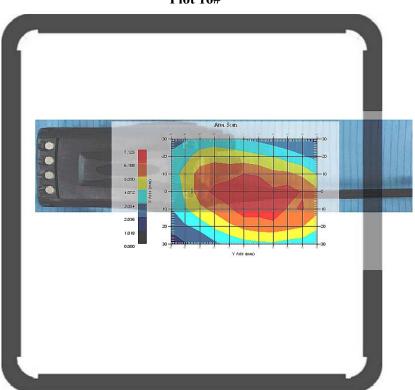
Serial No. : 500-00283 Frequency Band : 450 Duty Cycle Factor : 1 Conversion Factor : 6.0

Probe Sensitivity : 1.20 1.20 1.20 $\mu V/(V/m)$ 2

Compression Point : 95.00 mV Offset : 1.56 mm

1 gram SAR value : 6.888 W/kg 10 gram SAR value : 6.148 W/kg Area Scan Peak SAR : 7.125 W/kg Zoom Scan Peak SAR : 9.178 W/kg

Plot 16#



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APPENDIX A – MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

Measurement Uncertainty for 300MHz to 3GHz

Source of Uncertainty	Tolerance Value	Probability Distribution	Divisor	c _i ¹ (1-g)	c _i ¹ (10-g)	Standard Uncertainty (1-g) %	Standard Uncertainty (10-g) %
	Measurement System						
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	$(1-cp)^{1/2}$	$(1-cp)^1$	1.5	1.5
Hemispherical Isotropy	10.9	rectangular	$\sqrt{3}$	√ср	√ср	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	0.006	rectangular	$\sqrt{3}$	1	1	0.003	0.003
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
		Res	triction				
Probe Positioning with respect to Phantom Shell	2.9	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Extrapolation and Integration	3.7	rectangular	$\sqrt{3}$	1	1	2.1	2.1
Test Sample Positioning	0.023	normal	1	1	1	0.023	0.023
Device Holder Uncertainty	6.215	normal	1	1	1	6.215	6.215
Drift of Output Power	4.627	rectangular	$\sqrt{3}$	1	1	2.67	2.67
		Phantor	n and Setu	ıp			
Phantom Uncertainty(shape & thickness tolerance)	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
Liquid Conductivity(target)	5.0	rectangular	$\sqrt{3}$	0.7	0.5	2.0	1.4
Liquid Conductivity(meas.)	1.938	normal	1	0.7	0.5	1.36	0.97
Liquid Permittivity(target)	5.0	rectangular	$\sqrt{3}$	0.6	0.5	1.7	1.4
Liquid Permittivity(meas.)	3.093	normal	1	0.6	0.5	1.86	1.55
Combined Uncertainty		RSS				10.78	10.55
Expanded uncertainty (coverage factor=2)		Normal(k=2)				21.56	21.10

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APPENDIX B – PROBE CALIBRATION CERTIFICATES

NCL CALIBRATION LABORATORIES

Calibration File No.: 1427-1430

Client.: BACL Lab

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-5673

Calibrated: 8th August 2012 Released on: 9th August 2012

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

Released By:

Art Brennan, Quality Manager

VCL 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

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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 meteorgical practices.

Calibration Method

Probes are calibrated using the following methods.

<1000MHz

TEM Cell for sensitivity in air

Standard phantom using temperature transfer method for sensitivity in tissue

>1000MHz

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

- IEEE Standard 1528 (2003) including Amendment 1
 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 Ed. 1.0 (2010-03)
 - 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)
- 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
- IEEE 1309 Draft Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas, from 9kHz to 40GHz

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

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Division of APREL Inc.

Conditions

Probe 500-00283 was a recalibration with the exception frequency of 450 MHz .which was a new calibration

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
Power meter Anritsu MA2408A	90025437	Nov.4, 2012
Power Sensor Anritsu MA2481D	103555	Nov 4, 2012
Attenuator HP 8495A (70dB)	1944A10711	Sept. 14, 2012
Network Analyzer Anritsu MT8801C	MB11855	Feb. 8, 2013

Secondary Measurement Standards

Signal Generator Agilent E4438C -506 MY55182336 June 7, 2013

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

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

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Division of APREL Inc.

Probe Summary

Probe Type: E-Field Probe E020

Serial Number: 500-00283

Frequency: As presented on page 5

Sensor Offset: 1.56

Sensor Length: 2.5

Tip Enclosure: Composite*

Tip Diameter: < 2.9 mm

Tip Length: 55 mm

Total Length: 289 mm

Sensitivity in Air

 $\begin{array}{lll} \text{Channel X:} & 1.2 \ \mu \text{V/(V/m)}^2 \\ \text{Channel Y:} & 1.2 \ \mu \text{V/(V/m)}^2 \\ \text{Channel Z:} & 1.2 \ \mu \text{V/(V/m)}^2 \\ \end{array}$

Diode Compression Point: 95 mV

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^{*}Resistive to recommended tissue recipes per IEEE-1528

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Division of APREL Inc.

Calibration for Tissue (Head H, Body B)

Frequency	Tissue Type	Measured Epsilon	Measured Sigma	Calibration Uncertainty	Tolerance Uncertainty for 5%*	Conversion Factor
450 H	<mark>Head</mark>	43.98	0.9	<mark>3.5</mark>	<mark>3.4</mark>	<mark>6</mark>
450 B	<mark>Body</mark>	<mark>57.07</mark>	0.92	<mark>3.5</mark>	<mark>3.4</mark>	<mark>6</mark>
750 H	Head	X	X	X	X	X
750 B	Body	Х	X	X	X	X
835 H	<mark>Head</mark>	<mark>42.35</mark>	<mark>0.938</mark>	<mark>3.5</mark>	<mark>3.4</mark>	<mark>6.6</mark>
835 B	<mark>Body</mark>	<mark>56.65</mark>	1.018	<mark>3.5</mark>	<mark>3.4</mark>	<mark>6.6</mark>
900 H	<mark>Head</mark>	<mark>41.35</mark>	<mark>0.98</mark>	3.5	<mark>3.4</mark>	6
900 B	<mark>Body</mark>	<mark>56.08</mark>	1.05	<mark>3.5</mark>	<mark>3.4</mark>	<mark>6</mark>
1450 H	Head	X	X	X	X	X
1450 B	Body	X	X	X	Х	X
1500 H	Head	Х	X	X	X	X
1500 B	Body	Х	X	X	Х	X
1640 H	Head	Х	X	X	X	X
1640 B	Body	Х	X	X	X	Х
1750 H	Head	Х	X	X	X	Х
1750 B	Body	Х	X	X	X	X
1800 H	Head	Х	X	X	X	Х
1800 B	Body	X	X	X	X	Х
1900 H	<mark>Head</mark>	<mark>38.72</mark>	1.35	<mark>3.5</mark>	<mark>2.7</mark>	<mark>5.2</mark>
1900 B	<mark>Body</mark>	<mark>51.62</mark>	<mark>1.48</mark>	<mark>3.5</mark>	<mark>2.7</mark>	<mark>5</mark>
2000 H	Head	X	X	X	X	X
2000 B	Body	X	X	X	X	X
2100 H	Head	X	X	X	X	Х
2100 B	Body	X	X	X	Х	Х
2300 H	Head	Х	X	X	X	Х
2300 B	Body	X	X	X	X	X
2450 H	<mark>Head</mark>	<mark>38.06</mark>	1.87	<mark>3.5</mark>	<mark>3.5</mark>	<mark>4.9</mark>
2450B	<mark>Body</mark>	<mark>50.22</mark>	<mark>2.03</mark>	<mark>3.5</mark>	<mark>3.5</mark>	<mark>4.3</mark>
2600 H	Head	X	X	X	X	X
2600 B	Body	X	X	X	X	Х
3000 H	Head	Х	X	X	Х	X
3000 B	Body	X	X	X	X	X
3600 H	Head	X	X	X	X	X
3600 B	Body	Х	X	X	X	X
5200 H	Head	X	X	X	X	X
5200 B	Body	Х	X	X	X	X
5600 H	Head	Х	X	X	X	X
5600 B	Body	Х	X	X	Х	X
5800 H	Head	Х	X	Х	Х	X
5800 B	Body	Х	X	X	X	X

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

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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 $M\Omega$.

Boundary Effect:

For a distance of 0.58mm the worst case evaluated uncertainty (increase in the probe sensitivity) is less than 2.1%.

NOTES:

*The maximum deviation from the centre frequency when comparing the lower to upper range is listed.

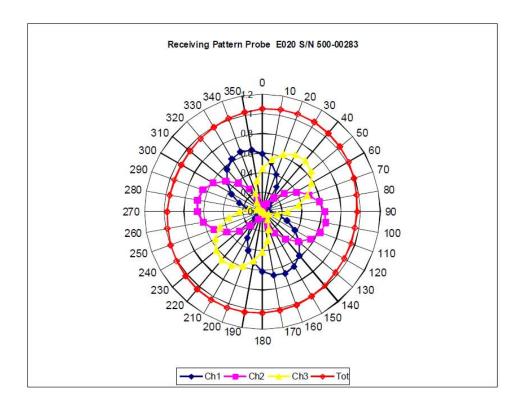
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This page has been reviewed for content and attested to on Page 2 of this document.

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Division of APREL Inc.

Receiving Pattern Air



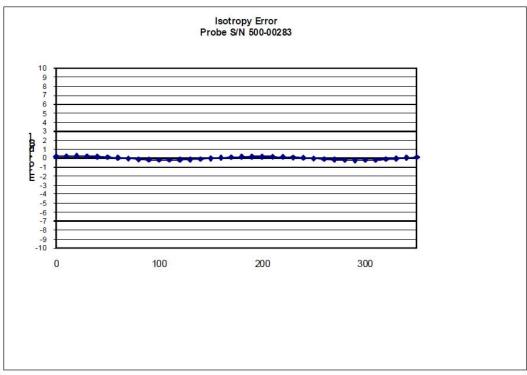
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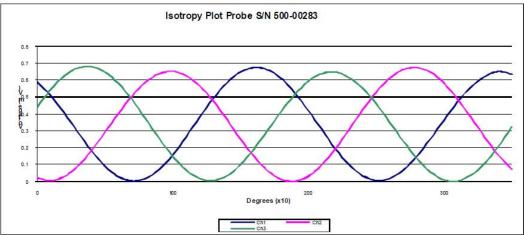
This page has been reviewed for content and attested to on Page 2 of this document.

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Division of APREL Inc.

Isotropy Error Air





Isotropicity Tissue:

0.10 dB

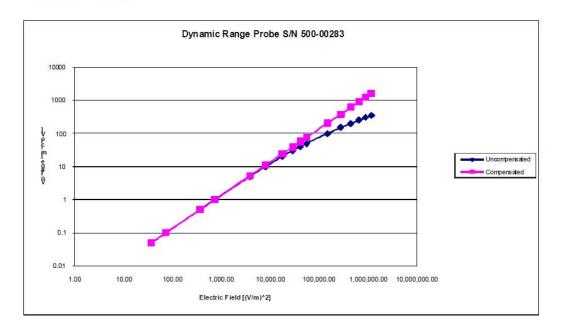
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NCL Calibration Laboratories Division of APREL Inc.

Dynamic Range



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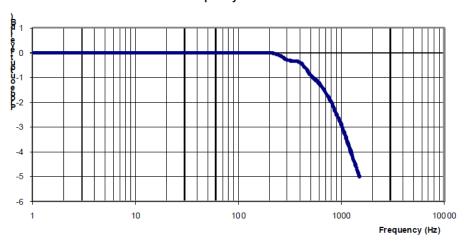
This page has been reviewed for content and attested to on Page 2 of this document.

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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 2012.

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APPENDIX C – DIPOLE CALIBRATION CERTIFICATES

NCL CALIBRATION LABORATORIES

Calibration File No: DC-1426 Project Number: BACL-5672

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.

Validation Dipole

Manufacturer: APREL Laboratories Part number: ALS-D-450-S-2 Frequency: 450 MHz Serial No: 175-00503

Customer: Bay Area Compliance Head and Body Calibration

Calibrated: 31st July 2012 Released on: 2nd August 2012

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

Released By:

Art Brennan, Quality Manager

NCL CALIBRATION LABORATORIES

303 Terry Fox Drive, Suite 102 Division of APREL Kanata, Ontario TEL: (613) 435-8300 CANADA K2K 3J1

FAX: (613) 435-8306

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Division of APREL Laboratories.

Conditions

Dipole 175-00503 was taken from stock for an original calibration..

Ambient Temperature of the Laboratory: $22 \,^{\circ}\text{C} \, +/- \, 0.5 \,^{\circ}\text{C}$ Temperature of the Tissue: $21 \,^{\circ}\text{C} \, +/- \, 0.5 \,^{\circ}\text{C}$

> 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

Calibration Results Summary

The following results relate the Calibrated Dipole and should be used as a quick reference for the user.

Mechanical Dimensions

Length: 270.0 mm **Height:** 166.7 mm

Electrical Specification

	Head	Body
Return Loss	-30.726 dB	-33.258 dB
SWR	1.061 U	1.049 U
Impedance	50.600Ω	48.155 Ω

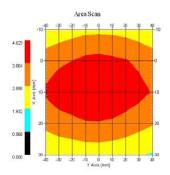
This page has been reviewed for content and attested to by signature within this document.

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Division of APREL Laboratories.

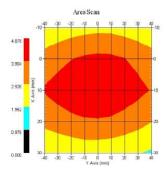
System Validation Results Head

Frequency	1 Gram	10 Gram	Peak
450 MHz	4.572	2.952	6.746



System Validation Results Body

Frequency	1 Gram	10 Gram	Peak
450 MHz	4.508	2.959	6.656



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Division of APREL Laboratories.

Introduction

This Calibration Report has been produced in line with the SSI Dipole Calibration Procedure SSI-TP-018-ALSAS. The results contained within this report are for Validation Dipole RFE-362. The calibration routine consisted of a three-step process. Step 1 was a mechanical verification of the dipole to ensure that it meets the mechanical specifications. Step 2 was an Electrical Calibration for the Validation Dipole, where the SWR, Impedance, and the Return loss were assessed. Step 3 involved a System Validation using the ALSAS-10U, along with APREL E-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure
SSI-TP-016 Tissue Calibration Procedure
IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average
Specific Absorption Rate (SAR) in the Human Body Due to Wireless
Communications Devices: Experimental Techniques"

Conditions

Original calibration.

Ambient Temperature of the Laboratory: $22 \,^{\circ}\text{C} \, +/- \, 0.5 \,^{\circ}\text{C}$ Temperature of the Tissue: $20 \,^{\circ}\text{C} \, +/- \, 0.5 \,^{\circ}\text{C}$

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This page has been reviewed for content and attested to by signature within this document.

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Division of APREL Laboratories.

Dipole Calibration Results

Mechanical Verification

APREL	APREL	Measured	Measured
Length	Height	Length	Height
280.0 mm	166.7 mm	280.0 mm	166.0 mm

Tissue Validation

Body Tissue 450MHz	Measured Head	Measured Body
Dielectric constant, ϵ_r	43.98	57.07
Conductivity, σ [S/m]	0.9	0.92

Dipole Calibration uncertainty

The calibration uncertainty for the dipole is made up of various parameters presented below.

Mechanical1%Positioning Error1.22%Electrical1.7%Tissue2.2%Dipole Validation2.2%

TOTAL 8.32% (16.64% K=2)

5

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Electrical Calibration

Test	Result Head	Result Body
S11 R/L	-30.726 dB	-33.258 dB
SWR	1.061 U	1.049 U
Impedance	50.600 Ω	48.155 Ω

The Following Graphs are the results as displayed on the Vector Network Analyzer.

S11 Parameter Return Loss



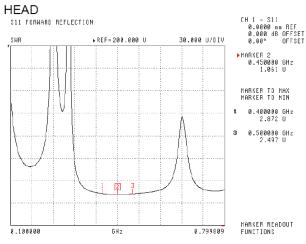
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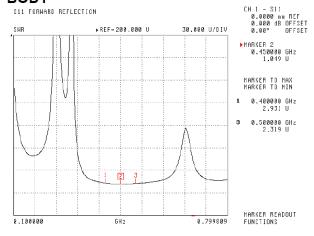
6

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SWR



BODY

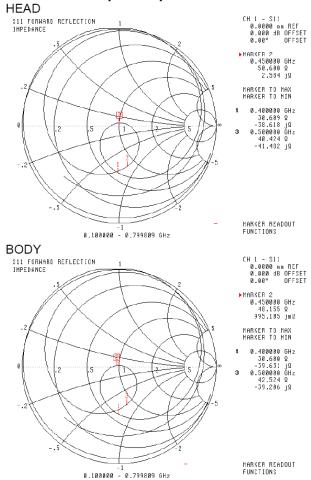


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Smith Chart Dipole Impedance



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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 2012.

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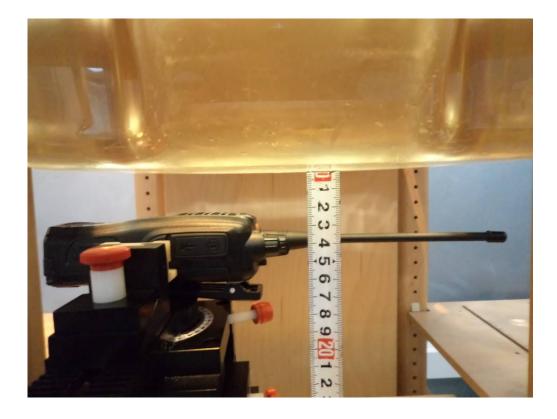
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APPENDIX D – EUT TEST POSITION PHOTOS



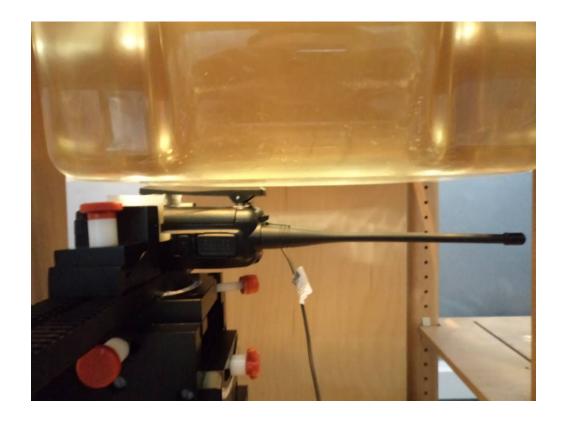


Face-Up 2.5 cm Separation to Flat Phantom Setup Photo



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Body-Back 0.0 cm Separation to Flat Phantom Setup Photo



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APPENDIX E – EUT PHOTOS

EUT – Front View



EUT – Back View



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EUT – Left View



EUT – Right View



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EUT - Top View



EUT – Bottom View



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EUT –Uncover View



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APPENDIX F – INFORMATIVE REFERENCES

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PRODUCT SIMILARITY DECLARATION LETTER



SHENZHEN COVALUE COMMUNICATIONS CO., LTD.

Add: 2/F., Bldg. 24, XiLi Industrial Park, No.119 Xinguang Rd, Xili, Nanshan, Shenzhen, China Tel: 0755-86345789 Fax: 0755-86345790

DECLARATION OF SIMILARITY

Date: 2013-9-5

To:

Bay Area Compliance Laboratories Corp. (Dongguan) No.69 Pulong Village Puxinhu Industry Zone Tangxia, Dongguan, China http://www.baclcorp.com

Dear Sir or Madam:

We, SHENZHEN COVALUE COMMUNICATIONS CO., LTD., hereby declare that product: Two way radio, model: DR6000-2, DR6100-2, DR7100-2 is electrically identical with the same electromagnetic emissions and electromagnetic compatibility characteristics as model name: DR7000-2 that was tested by BACL, the results of which are featured in BACL project.

A description of the differences between the tested model and those that are declared similar areas follows:

All the models just have different model name and appearance.

Please contact me should there be need for any additional clarification or information.

Best Regards,

神神

Shu, Chengtao

Research & Development Department Manager

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

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