

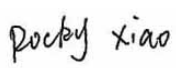

## SAR EVALUATION REPORT

For

### CLC Hong Kong Limited

2209, Concordia Plaza, North Tower, No.1 Science Museum Road, Tsim Sha Tsui East, Kowloon,  
Hong Kong.

**FCC ID: Y7WPLUME300**

<b>Report Type:</b> Original Report	<b>Product Type:</b> Ram Plus
<b>Test Engineer:</b> Rocky Xiao	
<b>Report Number:</b> RDG150625001-20	
<b>Report Date:</b> 2015-07-02	
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Attestation of Test Results			
EUT Information	Company Name	CLC Hong Kong Limited	
	EUT Description	Mobile Phone	
	FCC ID	Y7WPLUME300	
	Model Number	E300	
	Test Date	2015-07-01	
MODE		Max. SAR Level(s) Reported(W/Kg)	Limit(W/Kg)
GSM 850	1g Head SAR	0.290	1.6
	1g Body SAR	0.491	
PCS 1900	1g Head SAR	0.166	
	1g Body SAR	0.178	
Simultaneous	1g Head SAR	0.350	
	1g Body SAR	0.521	
Applicable Standards	ANSI / IEEE C95.1 : 2005 IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields,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 Such Fields,100 kHz—300 GHz.		
	FCC 47 CFR part 2.1093 Radiofrequency radiation exposure evaluation: portable devices		
	IEEE1528:2013 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques		
	IEC 62209-2: 2010 Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices-Human models, instrumentation, and procedures-Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)		
	KDB procedures KDB 447498 D01 General RF Exposure Guidance v05r02. KDB 648474 D04 Handset SAR v01r02. KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r03 KDB 865664 D02 RF Exposure Reporting v01r01		
	<p><b>Note:</b> 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 1528-2013 and RF exposure KDB procedures.</p> <p><b>The results and statements contained in this report pertain only to the device(s) evaluated.</b></p>		

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**DOCUMENT REVISION HISTORY**

Revision Number	Report Number	Description of Revision	Date of Revision
0	RDG150625001-20	Original Report	2015-07-02

FINAL

## EUT DESCRIPTION

This report has been prepared on behalf of CLC Hong Kong Limited and their product, named as Ram Plus, Model: E300, FCC ID: Y7WPLUME300, or the EUT (Equipment under Test) as referred to in the rest of this report.

### Technical Specification

<b>Product Type</b>	Ram Plus
<b>Exposure Category:</b>	Population / Uncontrolled
<b>Antenna Type(s):</b>	Internal Antenna
<b>Body-Worn Accessories:</b>	Portable
<b>Face-Head Accessories:</b>	None
<b>Multi-slot Class:</b>	Class12
<b>Operation Mode :</b>	GSM Voice, GPRS Data, Bluetooth
<b>Frequency Band:</b>	GSM 850 : 824-849 MHz(TX) ; 869-894 MHz(RX) PCS 1900: 1850-1910 MHz(TX) ; 1930-1990 MHz(RX) Bluetooth : 2402MHz-2480MHz
<b>Conducted RF Power:</b>	GSM 850 : 32.8dBm PCS 1900: 29.9dBm Bluetooth: 1.5 dBm
<b>Dimensions (L*W*H):</b>	12.78 cm (L) x 6.05 cm (W) x 2.38 cm (H)
<b>Power Source:</b>	3.7 VDC Rechargeable Battery
<b>Normal Operation:</b>	Head and Body-worn

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## REFERENCE, STANDARDS, AND GUIDELINES

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### **FCC:**

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

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

### **CE:**

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

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

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

**SAR Limits**

## FCC Limit (1g Tissue)

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

## CE Limit (10g Tissue)

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

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

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

General Population/Uncontrolled environments Spatial Peak limit 1.6W/kg (FCC) & 2 W/kg (CE) applied to the EUT.



## FACILITIES

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The Test site used by Bay Area Compliance Laboratories Corp. (Dongguan) to collect test data is located on the No.69 Pulongcun, Puxinhu Industrial Zone, Tangxia, Dongguan, Guangdong, China

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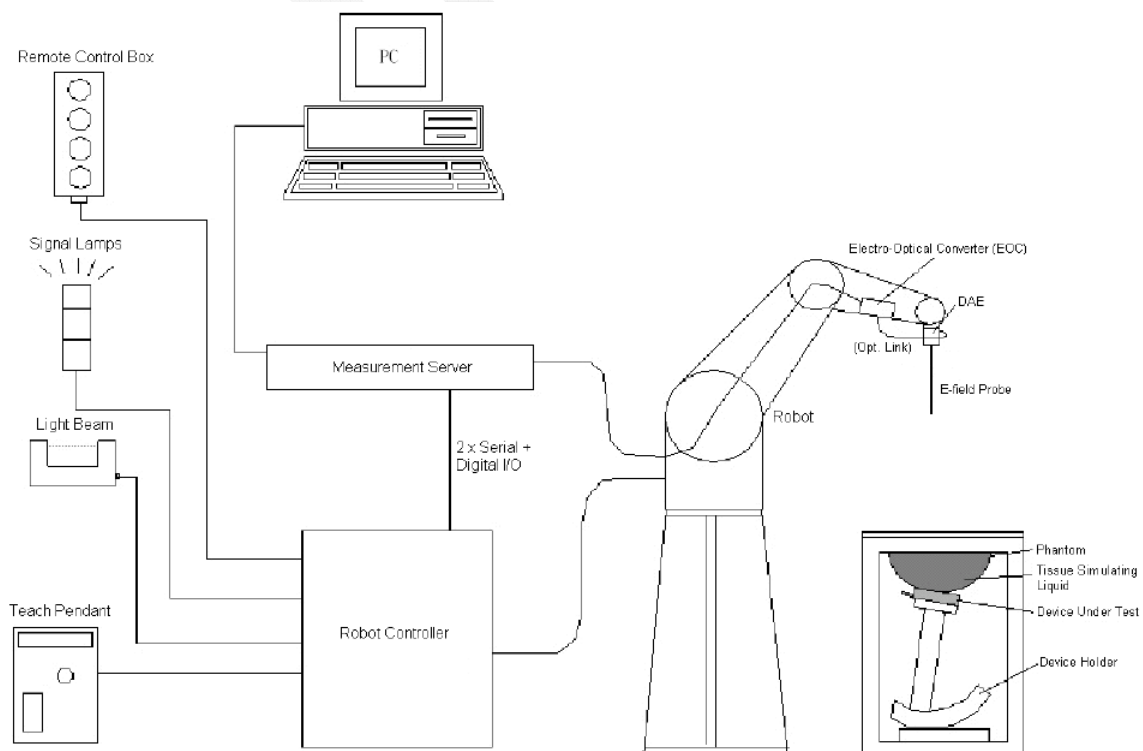
## DESCRIPTION OF TEST SYSTEM

These measurements were performed with the automated near-field scanning system DASY5 from Schmid & Partner Engineering AG (SPEAG) which is the Fifth generation of the system shown in the figure hereinafter:



### DASY5 System Description

The DASY5 system for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot (Staubli TX=RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7 professional operating system and the DASY52 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

### **DASY5 Measurement Server**

The DASY5 measurement server is based on a PC/104 CPU board with a 400MHz intel ULV Celeron, 128MB chip-disk and 128MB RAM. The necessary circuits for communication with the DAE4 (or DAE3) electronics box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY5 I/O board, which is directly connected to the PC/104 bus of the CPU board.



The measurement server performs all real-time data evaluation of field measurements and surface detection, controls robot movements and handles safety operation. The PC operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with an expansion port which is reserved for future applications. Please note that this expansion port does not have a standardized point out, and therefore only devices provided by SPEAG can be connected. Devices from any other supplier could seriously damage the measurement server.

### **Data Acquisition Electronics**

The data acquisition electronics (DAE4) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.

The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of both the DAE4 as well as of the DAE3 box is 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

### EX3DV4 E-Field Probes

<b>Frequency</b>	10 MHz to > 6 GHz Linearity: $\pm 0.2$ dB (30 MHz to 6 GHz)
<b>Directivity</b>	$\pm 0.3$ dB in TSL (rotation around probe axis) $\pm 0.5$ dB in TSL (rotation normal to probe axis)
<b>Dynamic Range</b>	10 $\mu$ W/g to > 100 mW/g Linearity: $\pm 0.2$ dB (noise: typically < 1 $\mu$ W/g)
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
<b>Application</b>	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
<b>Compatibility</b>	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

### SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region, where shell thickness increases to 6 mm). The phantom has three measurement areas:

- \_ Left hand
- \_ Right hand
- \_ Flat phantom

The phantom table for the DASY systems based on the TX90XL and RX160L robots have the size of 100 x 50 x 85 cm (L x W x H). The phantom table for the compact DASY systems based on the RX60L robot have the size of 100 x 75 x 91 cm (L x W x H); these tables are reinforced for mounting of the robot onto the table. For easy dislocation these tables have fork lift cut outs at the bottom.

The bottom plate contains three pairs of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. Only one device holder is necessary if two phantoms are used (e.g., for different liquids)

A white cover is provided to cover the phantom during o\_-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on top of this phantom cover are possible.

Three reference marks are provided on the phantom counter. These reference marks are used to teach the absolute phantom position relative to the robot.



## Device Holder for SAM Twin Phantom

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source in 5mm distance, a positioning uncertainty of  $\pm 0.5$  mm would produce a SAR uncertainty of  $\pm 20\%$ . An accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions, in which the devices must be measured, are defined by the standards.

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centers for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.



The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\epsilon_r=3$  and loss tangent  $\tan \delta=0.02$ . The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

## Robots

The DASY5 system uses the high precision industrial robots TX90XL from Staubli SA (France). The TX robot family is the successor of the well known RX robot family and offers the same features important for our application:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchron motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)

The above mentioned robots are controlled by the Staubli CS8c robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is contained on the CDs delivered along with the robot.

Paper manuals are available upon request direct from Staubli.

## Area Scans

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

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

## Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m<sup>3</sup> is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10mm, with the side length of the 10 g cube 21,5mm.

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

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

## 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.

### Recommended Tissue Dielectric Parameters for Head and Body

Frequency (MHz)	Head Tissue		Body Tissue	
	$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800-2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

## EQUIPMENT LIST AND CALIBRATION

### Equipments List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
Robot	RX90	D03636	N/A	N/A
DASY5 Test Software	DASY52.8	N/A	N/A	N/A
DASY5 Measurement Server	DASY5 4.5.12	1470	N/A	N/A
Data Acquisition Electronics	DAE4	1459	2015-01-26	2016-01-26
E-Field Probe	EX3DV4	7329	2015-02-05	2016-02-05
Dipole, 835MHz	ALS-D-835-S-2	180-00558	2014-10-08	2017-10-08
Dipole, 1900MHz	ALS-D-1900-S-2	210-00710	2013-10-09	2016-10-09
R&S, universal Radio Communication Tester	CMU200	105047	2014-11-20	2015-11-20
8960 Series 10 Wireless Communication Test Set	E5515C	MY50266471	2015-01-13	2016-01-13
Mounting Device	MD4HHTV5	SD 000 H01 KA	N/A	N/A
Twin SAM	Twin SAM V5.0	1874	N/A	N/A
Simulated Tissue 835 MHz Head	TS-835-H	201504	Each Time	/
Simulated Tissue 835 MHz Body	TS-835-B	201505	Each Time	/
Simulated Tissue 1900 MHz Head	TS-1900-H	201506	Each Time	/
Simulated Tissue 1900 MHz Body	TS-1900-B	201507	Each Time	/
Network Analyzer	8752C	3140A02356	2015-06-03	2016-06-03
Dielectric probe kit	85070B	US33020324	N/A	N/A
Signal Generator	E4422B	MY41000355	2014-10-27	2015-10-27
Power Meter	EPM-441A	GB37481494	2014-11-03	2015-11-03
Power Meter Sensor	8481A	T-03-EM-127	2014-11-03	2015-11-03
Power Amplifier	5205PE	1015	N/A	N/A
Directional Coupler	488Z	N/A	N/A	N/A
attenuator	20dB, 100W	N/A	N/A	N/A



## SAR MEASUREMENT SYSTEM VERIFICATION

### Liquid Verification



Liquid Verification Setup Block Diagram

### Liquid Verification Results

Frequency	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
824.2	Head	42.91	0.88	41.5	0.9	3.4	-2.22	$\pm 5$
	Body	55.13	0.96	55.2	0.97	-0.13	-1.03	$\pm 5$
836.6	Head	42.87	0.89	41.5	0.9	3.3	-1.11	$\pm 5$
	Body	55.1	0.98	55.2	0.97	-0.18	1.03	$\pm 5$
848.8	Head	42.71	0.9	41.5	0.9	2.92	0	$\pm 5$
	Body	55	0.99	55.2	0.97	-0.36	2.06	$\pm 5$
1850.2	Head	39.86	1.36	40	1.4	-0.35	-2.86	$\pm 5$
	Body	55.26	1.48	53.3	1.52	3.68	-2.63	$\pm 5$
1880	Head	39.73	1.39	40	1.4	-0.68	-0.71	$\pm 5$
	Body	53.72	1.54	53.3	1.52	0.79	1.32	$\pm 5$
1909.8	Head	39.59	1.41	40	1.4	-1.02	0.71	$\pm 5$
	Body	53.4	1.49	53.3	1.52	0.19	-1.97	$\pm 5$

\*Liquid Verification was performed on 2015-07-01.

Please refer to the following tables.

835 MHz Head			835 MHz Body		
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''
824	42.8809	19.1625	824	55.1193	21.0791
824.5	42.9504	19.1496	824.5	55.1477	20.9686
825	42.9445	19.1194	825	55.1207	21.0193
825.5	42.9401	19.1759	825.5	55.205	20.9766
826	42.8948	19.1392	826	55.116	21.0375
826.5	42.8861	19.1373	826.5	55.1474	21.0415
827	42.9008	19.1753	827	55.004	20.9731
827.5	42.9061	19.1445	827.5	55.156	20.9546
828	42.9598	19.2196	828	55.1255	20.9734
828.5	42.9303	19.1666	828.5	55.1627	21.0299
829	42.94	19.2514	829	55.1092	20.9171
829.5	42.9244	19.1743	829.5	55.0628	20.9026
830	42.9886	19.1676	830	55.1008	20.9303
830.5	42.9235	19.2256	830.5	55.1325	20.9895
831	42.9216	19.2003	831	55.0939	20.9525
831.5	42.8606	19.1605	831.5	55.1735	20.9632
832	42.9673	19.2029	832	55.1807	20.9348
832.5	42.933	19.2226	832.5	55.0889	20.9293
833	42.9677	19.1778	833	55.1335	20.9042
833.5	42.9053	19.242	833.5	55.1219	20.9398
834	42.925	19.24	834	55.1717	21.0566
834.5	42.907	19.1841	834.5	55.115	20.9459
835	42.9637	19.2355	835	55.1064	20.9686
835.5	42.9313	19.155	835.5	55.1078	20.9914
836	42.927	19.172	836	55.1398	21.0038
836.5	42.8752	19.1871	836.5	55.1044	20.9633
837	42.8419	19.1673	837	55.1063	21.0071
837.5	42.8712	19.2056	837.5	55.0462	20.9348
838	42.887	19.2305	838	55.1097	21.0046
838.5	42.8765	19.1819	838.5	55.1678	20.9867
839	42.9341	19.1973	839	55.0619	20.9601
839.5	42.891	19.163	839.5	55.0668	21.0142
840	42.941	19.127	840	55.025	21.0211
840.5	42.8641	19.1022	840.5	55.1592	20.952
841	42.8997	19.2031	841	55.0772	21.0133
841.5	42.9027	19.1119	841.5	55.0425	20.9949
842	42.8847	19.0921	842	55.0654	20.9473
842.5	42.8387	19.1315	842.5	55.0233	20.9871
843	42.8211	19.0582	843	55.0546	20.9495
843.5	42.8155	19.0737	843.5	55.0223	20.9604
844	42.7845	19.0902	844	55.0825	20.9367
844.5	42.8631	19.0345	844.5	55.0805	21.0442
845	42.7821	19.0786	845	55.096	20.986
845.5	42.8164	19.0591	845.5	55.0038	20.935
846	42.8413	19.0407	846	55.0199	20.9815
846.5	42.836	19.0114	846.5	55.0341	20.9346
847	42.7479	19.0669	847	54.9912	20.9504
847.5	42.7216	18.9904	847.5	55.0429	20.999
848	42.7882	19.0174	848	55.0208	21.0024
848.5	42.7346	18.9968	848.5	54.9974	20.9194
849	42.6866	18.9745	849	55.0023	20.9314

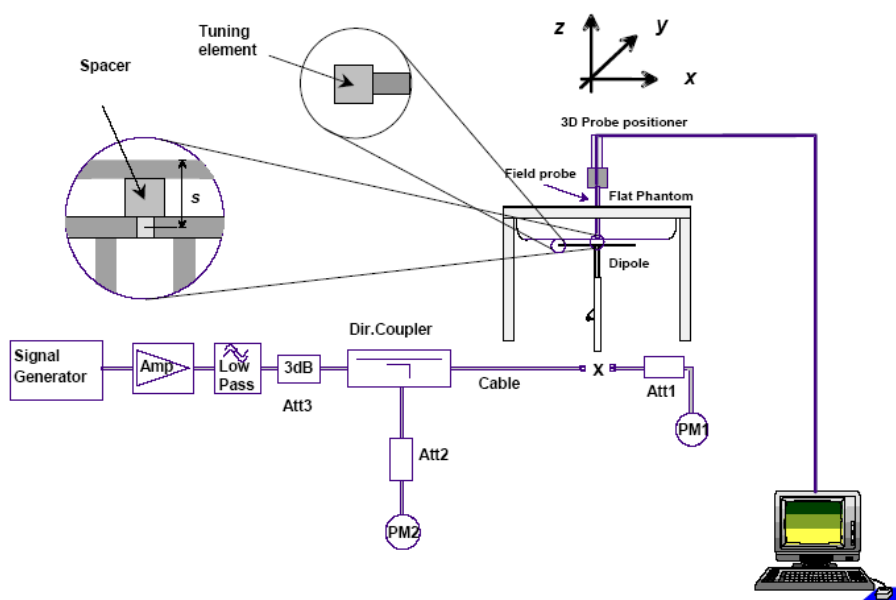
1900 MHz Head			1900 MHz Body		
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''
1850	39.8507	13.2012	1850	55.2372	14.3666
1851	39.8731	13.1879	1851	55.3591	14.358
1852	39.8569	13.1499	1852	55.2321	14.3405
1853	39.8278	13.1501	1853	55.1783	14.2593
1854	39.8936	13.1524	1854	55.0735	14.1685
1855	39.8764	13.2149	1855	55.0497	14.2465
1856	39.8385	13.1668	1856	54.9249	14.2788
1857	39.8923	13.207	1857	54.753	14.1861
1858	39.8599	13.1963	1858	54.6246	14.1245
1859	39.7917	13.1822	1859	54.5881	14.0531
1860	39.8459	13.2399	1860	54.4236	14.1691
1861	39.8616	13.2394	1861	54.4882	14.1184
1862	39.8692	13.2288	1862	54.3368	14.1292
1863	39.8195	13.1523	1863	54.2031	14.1353
1864	39.8092	13.178	1864	54.1467	14.173
1865	39.8526	13.2029	1865	54.084	14.1661
1866	39.8036	13.2324	1866	53.9976	14.168
1867	39.7881	13.2236	1867	53.8896	14.1666
1868	39.7803	13.2022	1868	53.8576	14.2123
1869	39.8701	13.3178	1869	53.7042	14.2079
1870	39.8576	13.2617	1870	53.6919	14.2696
1871	39.8171	13.2041	1871	53.6118	14.287
1872	39.8119	13.1815	1872	53.6737	14.3404
1873	39.8064	13.1853	1873	53.6603	14.4352
1874	39.7214	13.2801	1874	53.586	14.4393
1875	39.7909	13.1973	1875	53.6209	14.4962
1876	39.7363	13.2464	1876	53.6037	14.5822
1877	39.7765	13.2173	1877	53.6881	14.6502
1878	39.7559	13.2457	1878	53.6216	14.6803
1879	39.7622	13.258	1879	53.6548	14.6555
1880	39.7305	13.2771	1880	53.7231	14.7567
1881	39.7194	13.2078	1881	53.7409	14.7501
1882	39.7396	13.2557	1882	53.7887	14.7949
1883	39.7414	13.2809	1883	53.8296	14.8093
1884	39.7792	13.2671	1884	53.8958	14.8064
1885	39.6944	13.3007	1885	53.9714	14.8183
1886	39.6809	13.2976	1886	54.1133	14.8068
1887	39.6512	13.2902	1887	54.1461	14.7906
1888	39.6529	13.2763	1888	54.2408	14.7931
1889	39.6599	13.2973	1889	54.2552	14.7334
1890	39.6557	13.3094	1890	54.2599	14.7497
1891	39.6809	13.3227	1891	54.3446	14.7181
1892	39.7084	13.2672	1892	54.369	14.7012
1893	39.677	13.3002	1893	54.3482	14.6975
1894	39.6626	13.3027	1894	54.3286	14.6778
1895	39.639	13.3171	1895	54.355	14.6056
1896	39.693	13.2981	1896	54.4523	14.5291
1897	39.6385	13.3061	1897	54.3814	14.4751
1898	39.6279	13.289	1898	54.4411	14.4538
1899	39.6399	13.2809	1899	54.2426	14.3678
1900	39.6417	13.3439	1900	54.1662	14.3452

1900 MHz Head			1900 MHz Body		
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''
1901	39.6844	13.3217	1901	54.1195	14.2528
1902	39.5866	13.3399	1902	54.0606	14.2495
1903	39.6233	13.2627	1903	53.9603	14.2312
1904	39.6646	13.3622	1904	53.8566	14.1015
1905	39.666	13.3448	1905	53.7844	14.1293
1906	39.6026	13.3596	1906	53.6865	14.1031
1907	39.5583	13.3051	1907	53.6596	14.1303
1908	39.5613	13.3012	1908	53.5558	14.0244
1909	39.602	13.3401	1909	53.4639	14.0168
1910	39.5895	13.2901	1910	53.3856	14.0497

## 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



### System Accuracy Check Results

Date	Frequency Band	Liquid Type	Measured SAR (W/Kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2015/7/1	835	Head	1g	10.12	9.773	3.55	$\pm 10$
		Body	1g	9.37	9.736	-3.76	$\pm 10$
	1900	Head	1g	39.4	39.481	-0.21	$\pm 10$
		Body	1g	40.06	39.715	0.87	$\pm 10$

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

## SAR SYSTEM VALIDATION DATA

**Test Laboratory: Bay Area Compliance Labs Corp.(Dongguan)**

**System Performance 835MHz Head**

**DUT: ALS-D-835-S-2; Type: 835 MHz; Serial: 180-00558**

Communication System: CW; Frequency: 835 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 835 \text{ MHz}$ ;  $\sigma = 0.894 \text{ S/m}$ ;  $\epsilon_r = 42.964$ ;  $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(9.52, 9.52, 9.52); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**System Performance 835MHz Head /Area Scan (71x131x1):** Interpolated grid:  $dx=1.500 \text{ mm}$ ,  $dy=1.500 \text{ mm}$

Maximum value of SAR (interpolated) =  $11.1 \text{ W/kg}$

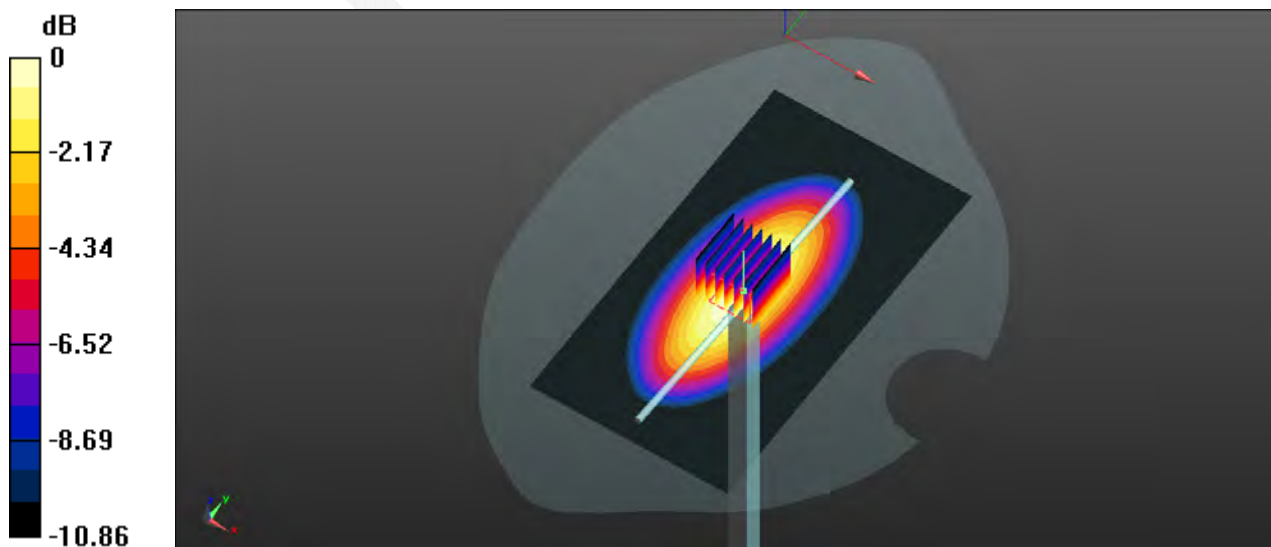
**System Performance 835MHz Head /Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5\text{mm}$ ,  $dy=5\text{mm}$ ,  $dz=5\text{mm}$

Reference Value =  $111.3 \text{ V/m}$ ; Power Drift =  $0.04 \text{ dB}$

Peak SAR (extrapolated) =  $16.2 \text{ W/kg}$

**SAR(1 g) =  $10.12 \text{ W/kg}$ ; SAR(10 g) =  $6.68 \text{ W/kg}$**

Maximum value of SAR (measured) =  $11.3 \text{ W/kg}$



0 dB =  $11.3 \text{ W/kg}$  =  $10.53 \text{ dBW/kg}$

**Test Laboratory: Bay Area Compliance Labs Corp.(Dongguan)**

**System Performance 835MHz Body**

**DUT: ALS-D-835-S-2; Type: 835 MHz; Serial: 180-00558**

Communication System: CW; Frequency: 835 MHz;Duty Cycle: 1:1

Medium parameters used:  $f = 835 \text{ MHz}$ ;  $\sigma = 0.974 \text{ S/m}$ ;  $\epsilon_r = 55.106$ ;  $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(9.17, 9.17, 9.17); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**System Performance 835MHz Body /Area Scan (71x131x1):** Interpolated grid:  $dx=1.500 \text{ mm}$ ,  $dy=1.500 \text{ mm}$

Maximum value of SAR (interpolated) =  $9.96 \text{ W/kg}$

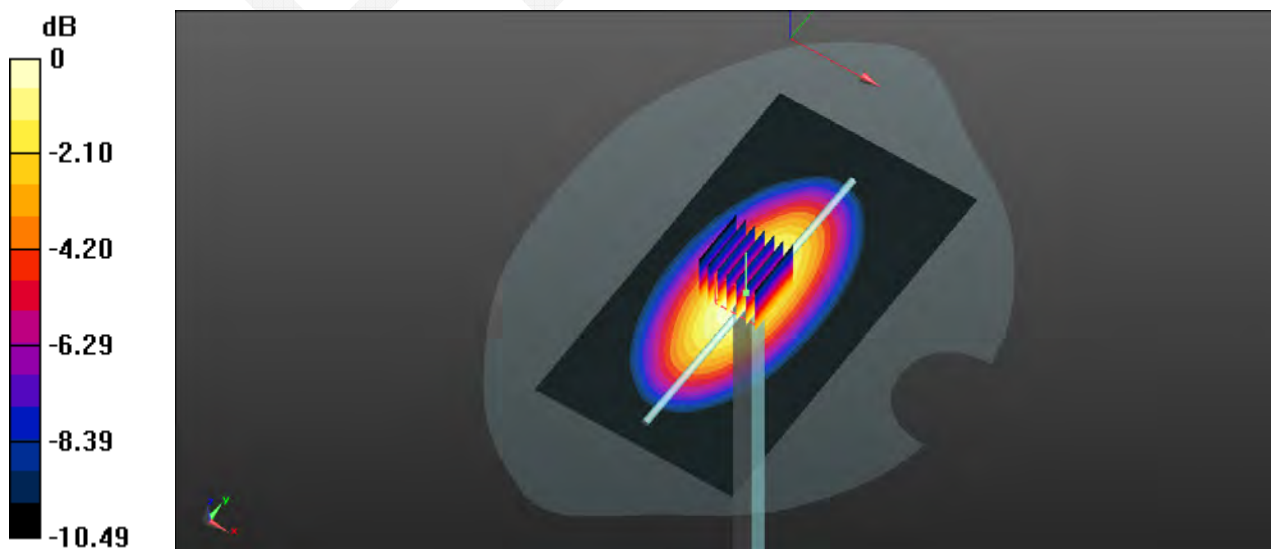
**System Performance 835MHz Body /Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5\text{mm}$ ,  $dy=5\text{mm}$ ,  $dz=5\text{mm}$

Reference Value =  $99.47 \text{ V/m}$ ; Power Drift =  $0.02 \text{ dB}$

Peak SAR (extrapolated) =  $13.9 \text{ W/kg}$

**SAR(1 g) =  $9.37 \text{ W/kg}$ ; SAR(10 g) =  $6.08 \text{ W/kg}$**

Maximum value of SAR (measured) =  $9.99 \text{ W/kg}$



0 dB =  $9.99 \text{ W/kg}$  =  $10.00 \text{ dBW/kg}$

**Test Laboratory: Bay Area Compliance Labs Corp. (Dongguan)**

**System Performance 1900MHz Head**

**DUT: ALS-D-1900-S-2; Type: 1900 MHz; Serial: 210-00710**

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 1900$  MHz;  $\sigma = 1.41$  S/m;  $\epsilon_r = 39.642$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.88, 7.88, 7.88); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**System Performance 1900MHz Head /Area Scan (61x81x1):** Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 46.9 W/kg

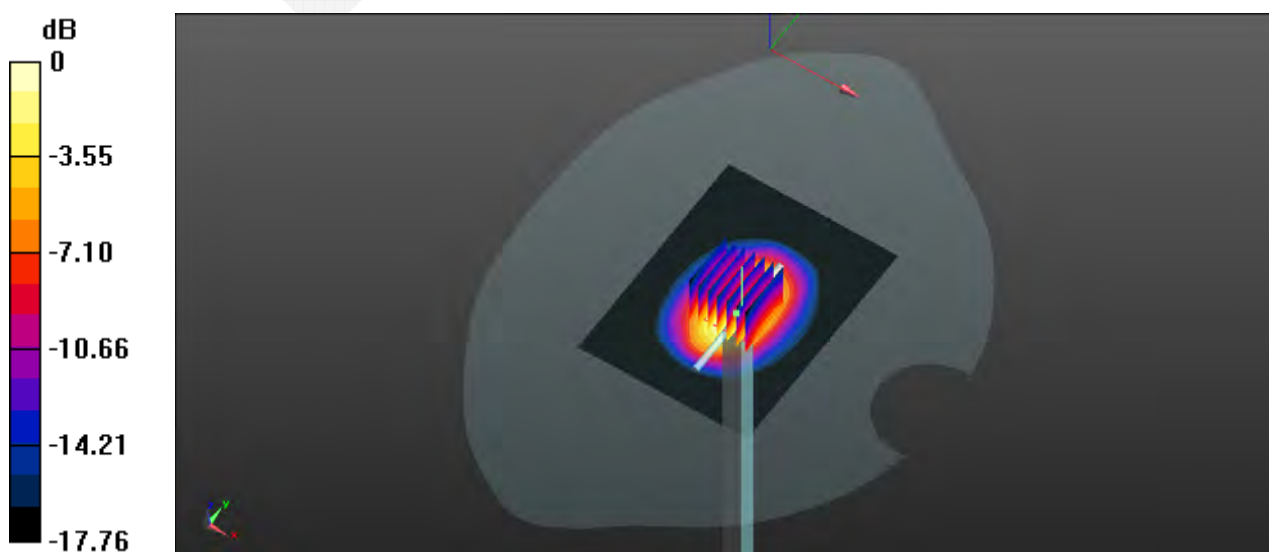
**System Performance 1900MHz Head /Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 174.5 V/m; Power Drift = -0.15 dB

Peak SAR (extrapolated) = 74.0 W/kg

**SAR(1 g) = 39.4 W/kg; SAR(10 g) = 20.4 W/kg**

Maximum value of SAR (measured) = 44.4 W/kg



0 dB = 44.4 W/kg = 16.47 dBW/kg



**Test Laboratory: Bay Area Compliance Labs Corp. (Dongguan)**

**System Performance 1900MHz Body**

**DUT: ALS-D-1900-S-2; Type: 1900 MHz; Serial: 210-00710**

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 1900$  MHz;  $\sigma = 1.515$  S/m;  $\epsilon_r = 54.189$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.56, 7.56, 7.56); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**System Performance 1900MHz Body /Area Scan (61x81x1):** Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 48.6 W/kg

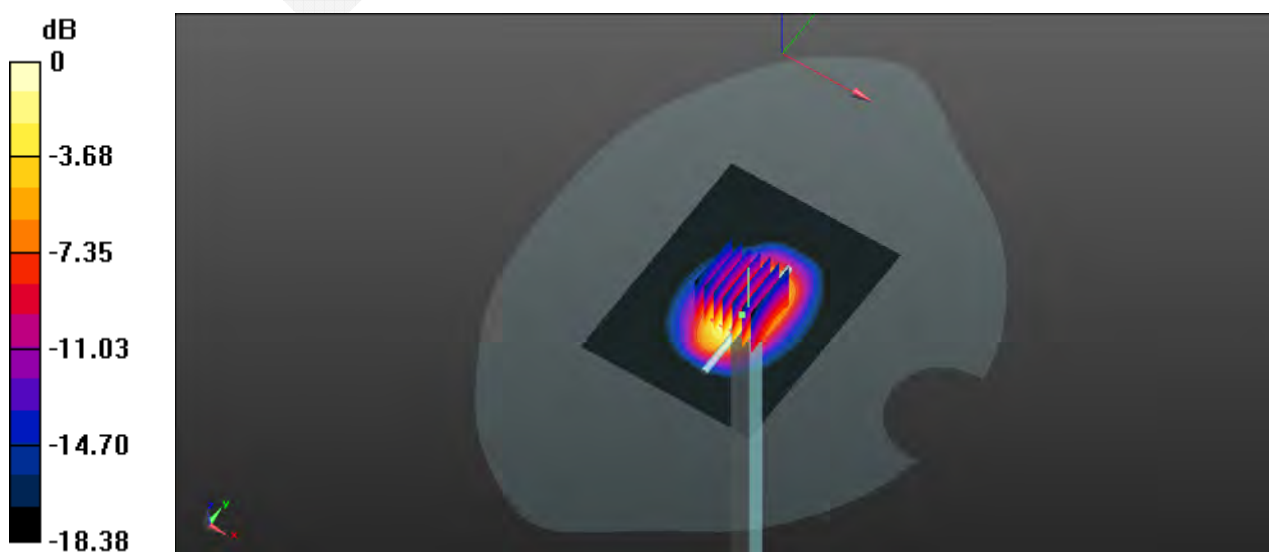
**System Performance 1900MHz Body /Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 171.8 V/m; Power Drift = 0.14 dB

Peak SAR (extrapolated) = 78.9 W/kg

**SAR(1 g) = 40.06 W/kg; SAR(10 g) = 20.5 W/kg**

Maximum value of SAR (measured) = 47.0 W/kg



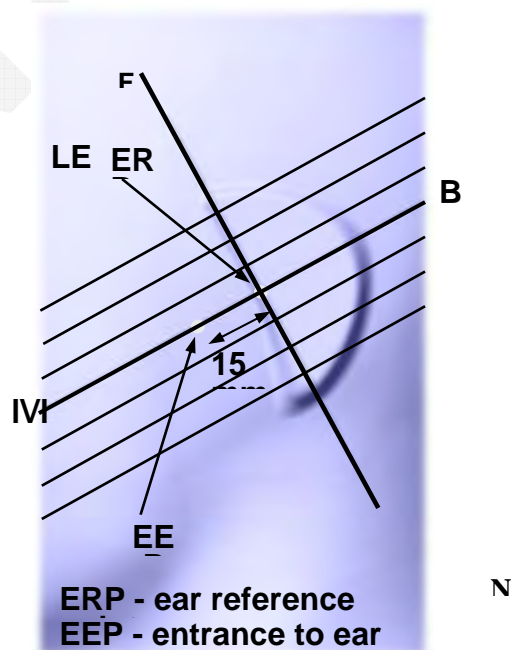
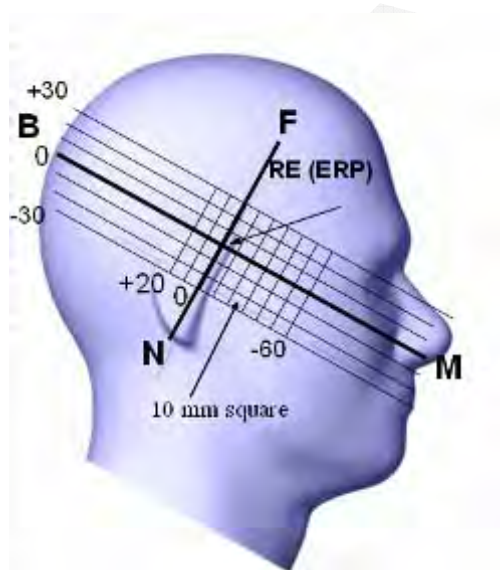
0 dB = 47.0 W/kg = 16.72 dBW/kg

## 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  $\frac{1}{4}$  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:



## 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.

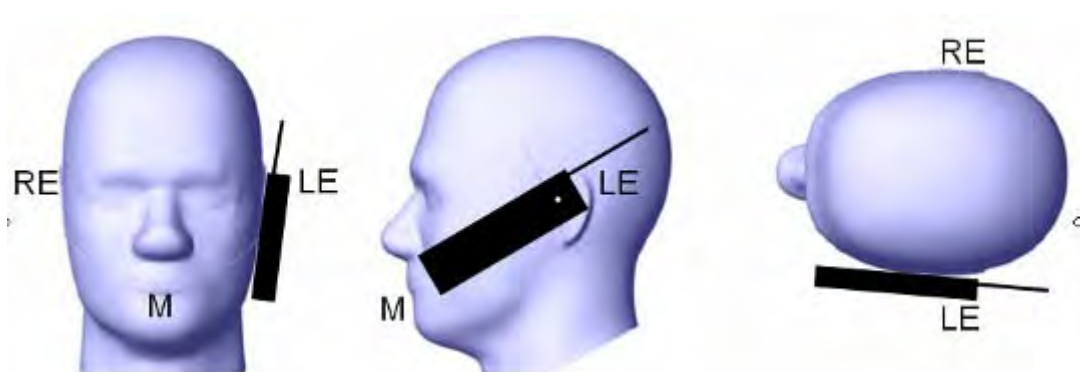
This test position is established:

When any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom.

(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

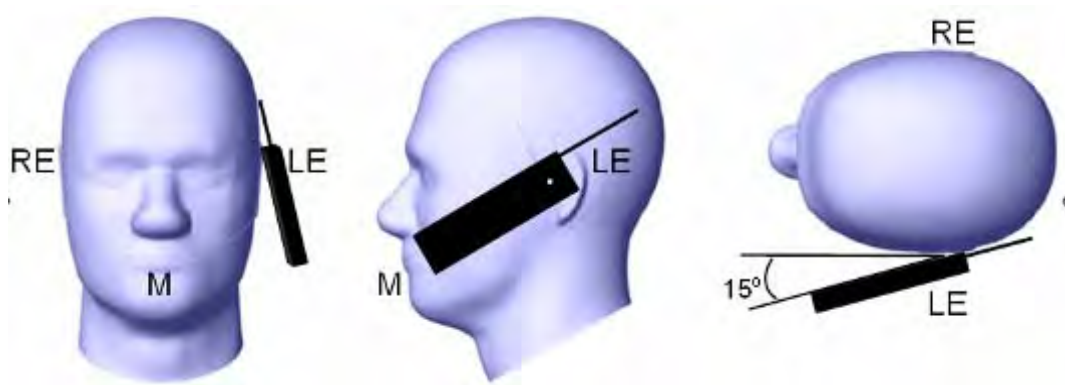
With the handset aligned in the “Cheek/Touch Position”:

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 is by 15° to 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.

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, Tilt/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.

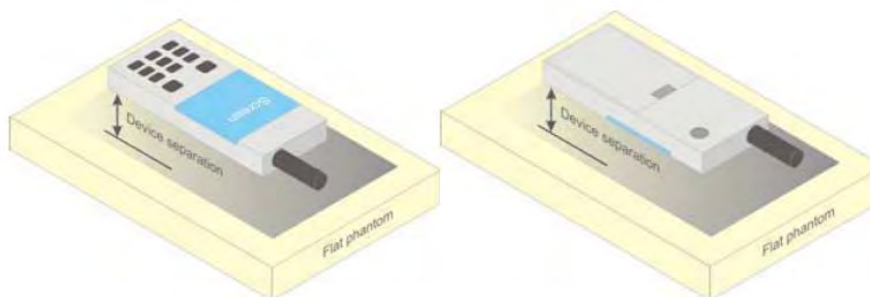
### Ear /Tilt 15° Position



### **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.



**Figure 5 – Test positions for body-worn devices**

## 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 30 mm x 30 mm x 30 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

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

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

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

## Test methodology

KDB 447498 D01 General RF Exposure Guidance v05r02.  
KDB 648474 D04 Handset SAR v01r02.  
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r03  
KDB 865664 D02 RF Exposure Reporting v01r01

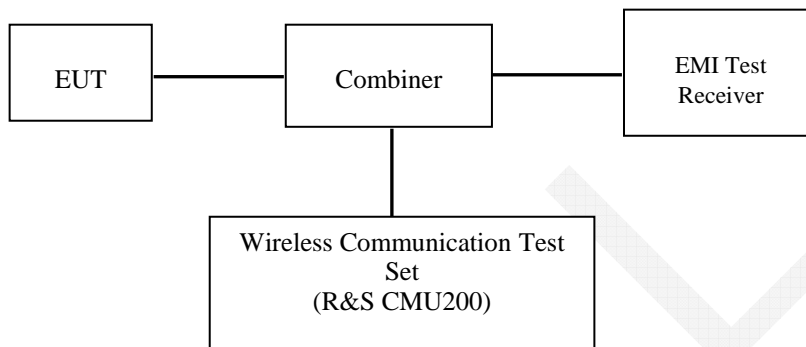
## CONDUCTED OUTPUT POWER MEASUREMENT

### 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 EMI Test Receiver through sufficient attenuation.



### GSM/GPRS

### Radio Configuration

The power measurement was configured by the Wireless Communication Test Set CMU200.

### GSM

Function: Menu select > GSM Mobile Station > GSM 850/1900

Press Connection control to choose the different menus

Press RESET > choose all the reset all settings

Connection: Press Signal Off to turn off the signal and change settings

Network Support > GSM + only

MS Signal

> 33 dBm for GSM 850

> 30 dBm for GSM 1900

BS Signal: Enter the same channel number for TCH channel (test channel) and BCCH channel

Frequency Offset >+ 0 Hz

Mode > BCCH and TCH

BCCH Level > -85 dBm (May need to adjust if link is not stable)

BCCH Channel > choose desired test channel [Enter the same channel number for TCH channel (test channel) and BCCH channel]

Channel Type > Off

P0 > 4 dB

TCH > choose desired test channel

Hopping > Off

AF/RF: Enter appropriate offsets for Ext. Att. Output and Ext. Att. Input

Connection: Press Signal on to turn on the signal and change settings



**GPRS**

Function: Menu select > GSM Mobile Station > GSM 850/1900

Press Connection control to choose the different menus

Press RESET > choose all the reset all settings

Connection: Press Signal Off to turn off the signal and change settings

Network Support > GSM + GPRS or GSM + EGSM

Main Service > Packet Data

Service selection > Test Mode A – Auto Slot Config. off

MS Signal: Press Slot Config Bottom on the right twice to select and change the number of time slots and power setting

> Slot configuration > Uplink/Gamma

> 33 dBm for GPRS 850

> 30 dBm for GPRS 1900

BS Signal: Enter the same channel number for TCH channel (test channel) and BCCH channel

Frequency Offset >+ 0 Hz

Mode > BCCH and TCH

BCCH Level > -85 dBm (May need to adjust if link is not stable)

BCCH Channel > choose desired test channel [Enter the same channel number for TCH channel (test channel) and BCCH channel]

Channel Type > Off

P0 > 4 dB

Slot Config > Unchanged (if already set under MS signal)

TCH > choose desired test channel

Hopping > Off

Main Timeslot > 3

Network: Coding Scheme > CS4 (GPRS)

Bit Stream > 2E9-1 PSR Bit Stream

AF/RF: Enter appropriate offsets for Ext. Att. Output and Ext. Att. Input

Connection: Press Signal on to turn on the signal and change settings

**Maximum Target Output Power**

Max Target Output Power (dBm)			
Mode/Band	Channel		
	Low	Middle	High
GSM 850	32.9	32.9	32.9
GPRS 1 slot	32.4	32.4	32.4
GPRS 2 slots	31.2	31.2	31.2
GPRS 3 slots	29.9	29.9	29.9
GPRS 4 slots	28.8	28.8	28.8
PCS 1900	30	30	30
GPRS 1 slot	29.5	29.5	29.5
GPRS 2 slots	28.3	28.3	28.3
GPRS 3 slots	27.1	27.1	27.1
GPRS 4 slots	25.8	25.8	25.8
Bluetooth	1.6	1.6	1.6

**Test Results:****GSM:**

Band	Channel No.	Frequency (MHz)	Time Based Average Power (dBm)
GSM 850	128	824.2	32.8
	190	836.6	<b>32.8</b>
	251	848.8	32.7
PCS 1900	512	1850.2	<b>29.9</b>
	661	1880	29.3
	810	1909.8	29.1

**GPRS:**

Band	Channel No.	Frequency (MHz)	RF Output Power (dBm)			
			1 slot	2 slots	3 slots	4 slots
GSM 850	128	824.2	32.19	31.03	29.76	28.55
	190	836.6	32.25	31.1	29.82	28.67
	251	848.8	32.04	30.97	29.71	28.49
PCS 1900	512	1850.2	29.44	28.19	27.01	25.73
	661	1880	29.07	27.95	26.86	25.4
	810	1909.8	28.89	27.66	26.45	25.29

For SAR, the time based average power is relevant, the difference in between depends on the duty cycle of the TDMA signal.

Number of Time slot	1	2	3	4
Duty Cycle	1:8	1:4	1:2.66	1:2
Time based Ave. power compared to slotted Ave. power	-9 dB	-6 dB	-4.25 dB	-3 dB
Crest Factor	8	4	2.66	2



**The time based average power for GPRS**

Band	Channel No.	Frequency (MHz)	Time based average Power (dBm)			
			1 slot	2 slot	3 slots	4 slots
GSM 850	128	824.2	23.19	25.03	25.51	25.55
	190	836.6	23.25	25.1	25.57	<b>25.67</b>
	251	848.8	23.04	24.97	25.46	25.49
PCS 1900	512	1850.2	20.44	22.19	<b>22.76</b>	22.73
	661	1880	20.07	21.95	22.61	22.4
	810	1909.8	19.89	21.66	22.2	22.29

**Note:**

1. Rohde & Schwarz Radio Communication Tester (CMU200) was used for the measurement of GSM peak and average output power for active timeslots.
2. For GSM voice, 1 timeslot has been activated with power level 5 (850 MHz band) and 0 (1900 MHz band).
3. For GPRS, 1, 2, 3 and 4 timeslots has been activated separately with power level 3(850 MHz band) and 3(1900 MHz band).

**Bluetooth**

Mode	Channel No.	Channel frequency (MHz)	RF Output Power (dBm)
BDR(GFSK)	0	2402	1.15
	39	2441	1.5
	78	2480	1.16
EDR(4-DQPSK)	0	2402	0.67
	39	2441	0.88
	78	2480	0.61
EDR-8DPSK	0	2402	1
	39	2441	1.08
	78	2480	1.38

## SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

### SAR Test Data

#### Environmental Conditions

Temperature:	23-23.5 °C
Relative Humidity:	36 %
ATM Pressure:	996 mbar

Testing was performed by Rocky Xiao on 2015-07-01

#### GSM 850:

EUT Position	Frequency (MHz)	Test Mode	Power Drift (%)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/Kg)			
						Scaled Factor	Meas. SAR	Scaled SAR	Plot
Left Head Cheek	824.2	GSM	1.121	32.80	32.9	1.023	0.276	0.282	/
	836.6	GSM	1.625	32.80	32.9	1.023	0.283	0.29	1#
	848.8	GSM	-1.221	32.70	32.9	1.047	0.271	0.284	/
Left Head Tilt	824.2	GSM	/	/	/	/	/	/	/
	836.6	GSM	-2.99	32.80	32.9	1.023	0.175	0.179	/
	848.8	GSM	/	/	/	/	/	/	/
Right Head Cheek	824.2	GSM	/	/	/	/	/	/	/
	836.6	GSM	0.828	32.80	32.9	1.023	0.256	0.262	/
	848.8	GSM	/	/	/	/	/	/	/
Right Head Tilt	824.2	GSM	/	/	/	/	/	/	/
	836.6	GSM	1.687	32.80	32.9	1.023	0.168	0.172	/
	848.8	GSM	/	/	/	/	/	/	/
Body-Back-Headset (10mm)	824.2	GSM	/	/	/	/	/	/	/
	836.6	GSM	-1.825	32.80	32.9	1.023	0.168	0.172	/
	848.8	GSM	/	/	/	/	/	/	/
Body-Worn-Back (10mm)	824.2	GPRS	0.067	28.55	28.8	1.059	0.452	0.479	/
	836.6	GPRS	-3.172	28.67	28.8	1.03	0.477	0.491	2#
	848.8	GPRS	3.401	28.49	28.8	1.074	0.45	0.483	/

#### Note:

1. When the 1-g SAR is  $\leq 0.8\text{W/Kg}$ , testing for other channels are optional.
2. The EUT transmit and receive through the same GSM antenna while testing SAR.
3. When SAR or MPE is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance.
4. When the maximum output power variation across the required test channels is  $> \frac{1}{2}$  dB, instead of the middle channel, the highest output power channel must be used.
5. The Multi-slot Classes of EUT is Class 12 which has maximum 4 Downlink slots and 4 Uplink slots, the maximum active slots is 5, when perform the multiple slots scan, 1DL+4UL is the worst case.

**PCS Band:**

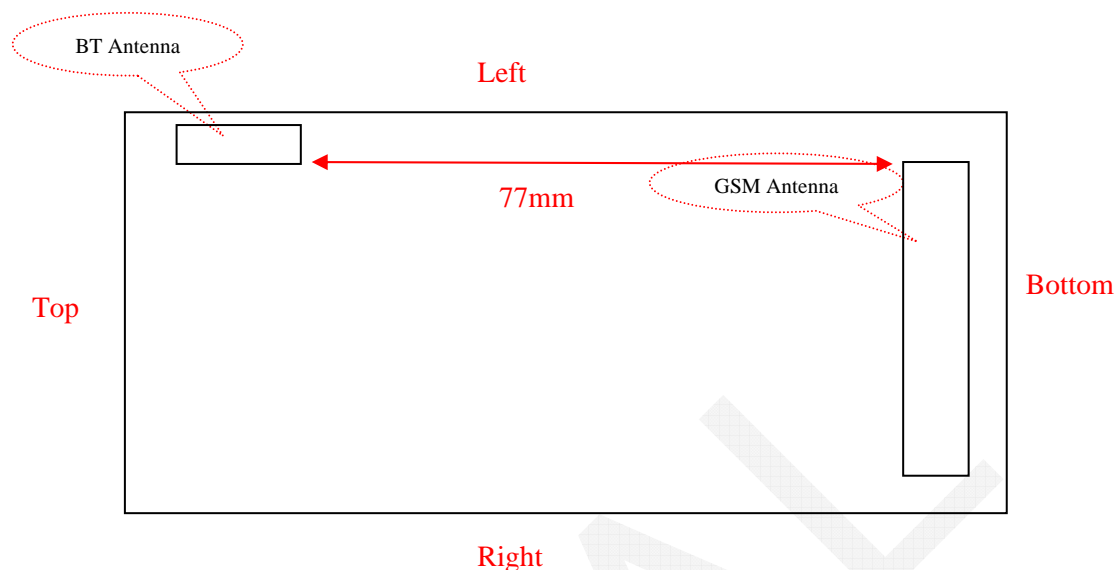
EUT Position	Frequency (MHz)	Test Mode	Power Drift (%)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/Kg)			
						Scaled Factor	Meas. SAR	Scaled SAR	Plot
Left Head Cheek	1850.2	GSM	3.753	29.90	30	1.023	0.162	0.166	3#
	1880	GSM	-3.971	29.30	30	1.175	0.141	0.166	/
	1909.8	GSM	2.542	29.10	30	1.23	0.121	0.149	/
Left Head Tilt	1850.2	GSM	-0.021	29.90	30	1.023	0.081	0.083	/
	1880	GSM	/	/	/	/	/	/	/
	1909.8	GSM	/	/	/	/	/	/	/
Right Head Cheek	1850.2	GSM	-1.784	29.90	30	1.023	0.145	0.148	/
	1880	GSM	/	/	/	/	/	/	/
	1909.8	GSM	/	/	/	/	/	/	/
Right Head Tilt	1850.2	GSM	-2.267	29.90	30	1.023	0.082	0.084	/
	1880	GSM	/	/	/	/	/	/	/
	1909.8	GSM	/	/	/	/	/	/	/
Body-Back-Headset (10mm)	1850.2	GSM	-3.348	29.90	30	1.023	0.158	0.162	/
	1880	GSM	/	/	/	/	/	/	/
	1909.8	GSM	/	/	/	/	/	/	/
Body-Worn-Back (10mm)	1850.2	GPRS	-2.949	27.01	27.1	1.021	0.174	0.178	4#
	1880	GPRS	-1.073	26.86	27.1	1.057	0.16	0.169	/
	1909.8	GPRS	1.303	26.45	27.1	1.161	0.152	0.176	/

**Note:**

1. When the 1-g SAR is  $\leq 0.8\text{W/Kg}$ , testing for other channels are optional.
2. The EUT transmit and receive through the same GSM antenna while testing SAR.
3. When SAR or MPE is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance.
4. When the maximum output power variation across the required test channels is  $> \frac{1}{2}$  dB, instead of the middle channel, the highest output power channel must be used.
5. The Multi-slot Classes of EUT is Class 12 which has maximum 4 Downlink slots and 4 Uplink slots, the maximum active slots is 5, when perform the multiple slots scan, 2DL+3UL is the worst case.

## SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

### BT and GSM Antennas Location:



### Simultaneous Transmission:

Description of Simultaneous Transmit Capabilities			Antennas Distance (mm)
Transmitter Combination	Simultaneous?	Hotspot?	
GSM + Bluetooth	√	×	77
GPRS + Bluetooth	√	×	77

### Standalone SAR test exclusion considerations

Mode	Frequency (MHz)	Pavg (dBm)	Pavg (mW)	Distance (mm)	Calculated value	Threshold (1-g)	SAR Test Exclusion
Bluetooth	2450	1.6	1.45	0	0.45	3	YES

### NOTE:

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm are determined by:

$$\left[ \frac{\text{max. power of channel, including tune-up tolerance, mW}}{\text{min. test separation distance, mm}} \right] \cdot \left[ \sqrt{f(\text{GHz})} \right] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

1.  $f(\text{GHz})$  is the RF channel transmit frequency in GHz.
2. Power and distance are rounded to the nearest mW and mm before calculation.
3. The result is rounded to one decimal place for comparison.
4. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test Exclusion.

**Standalone SAR estimation:**

Mode	Frequency (MHz)	Pavg (dBm)	Pavg (mW)	Distance (mm)	Estimated 1-g (W/kg)
Bluetooth Head	2450	1.6	1.45	0	0.0603
Bluetooth Body	2450	1.6	1.45	10	0.03015

When standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})} / x]$$

W/kg for test separation distances  $\leq 50$  mm;

where  $x = 7.5$  for 1-g SAR.

When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test Exclusion

**Simultaneous SAR test exclusion considerations:**

Mode (SAR1+SAR2)	Position	Reported SAR (W/kg)		$\Sigma$ SAR < 1.6W/kg
		SAR1	SAR2	
GSM 850+ Bluetooth	Left Head Cheek	0.29	0.0603	0.3503
	Left Head Tilt	0.179	0.0603	0.2393
	Right Head Cheek	0.262	0.0603	0.3223
	Right Head Tilt	0.172	0.0603	0.2323
	Body-Back-Headset	0.172	0.03015	0.20215
GPRS 850 + Bluetooth	Body-Back	0.491	0.03015	<b>0.52115</b>
GSM 1900+ Bluetooth	Left Head Cheek	0.166	0.0603	0.2263
	Left Head Tilt	0.083	0.0603	0.1433
	Right Head Cheek	0.148	0.0603	0.2083
	Right Head Tilt	0.084	0.0603	0.1443
	Body-Back-Headset	0.162	0.03015	0.19215
GPRS 1900 +Bluetooth	Body-Back	0.178	0.03015	0.20815

**Conclusion:**

$\Sigma$  SAR < 1.6 W/kg therefore simultaneous transmission SAR with Volume Scans is **not** required.

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

Test Laboratory: Bay Area Compliance Labs Corp. (Dongguan)

Test Plot 1: GSM 850-Left Head Check Middle Channel

DUT: Ram Plus; Type: E300

Communication System: GSM 850; Frequency: 836.6 MHz; Duty Cycle: 1:8

Medium parameters used:  $f = 836.6$  MHz;  $\sigma = 0.893$  S/m;  $\epsilon_r = 42.875$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Left Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(9.52, 9.52, 9.52); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

Head/Left Cheek/Area Scan (81x141x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm

Maximum value of SAR (interpolated) = 0.155 W/kg

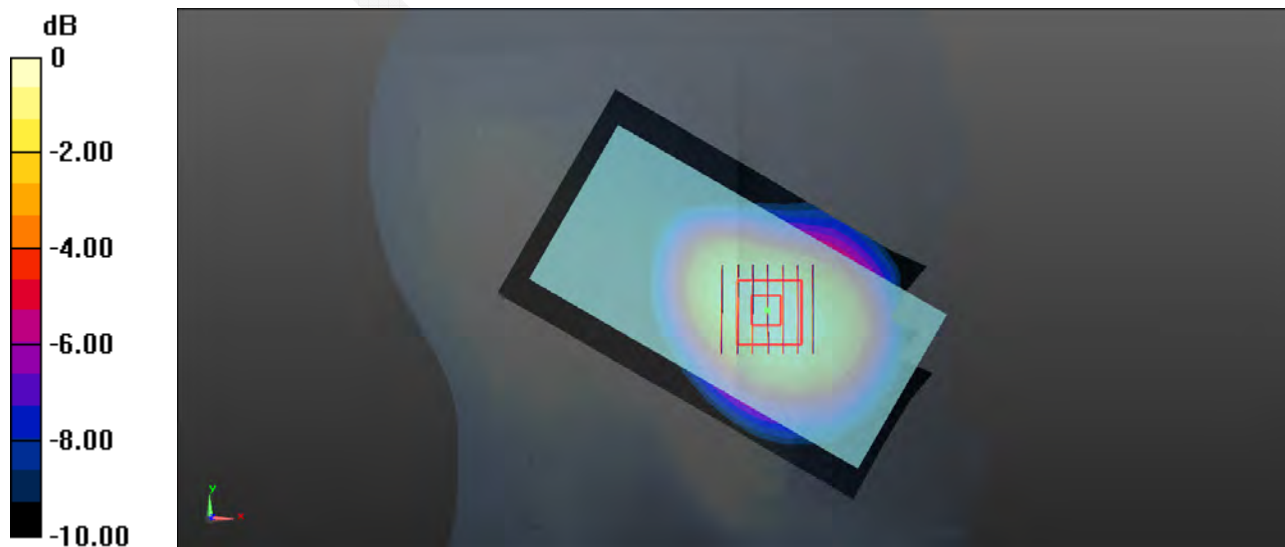
Head/Left Cheek/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 3.591 V/m; Power Drift = 0.07 dB

Peak SAR (extrapolated) = 0.600 W/kg

**SAR(1 g) = 0.283 W/kg; SAR(10 g) = 0.188 W/kg**

Maximum value of SAR (measured) = 0.302 W/kg



**Test Laboratory: Bay Area Compliance Labs Corp. (Dongguan)****Test Plot 2: GSM 850 Body-Back-Worn Middle Channel****DUT: Ram Plus; Type: E300**

Communication System: GPRS 850-4 SLOT ; Frequency: 836.6 MHz; Duty Cycle: 1:2

Medium parameters used:  $f = 836.6$  MHz;  $\sigma = 0.976$  S/m;  $\epsilon_r = 55.104$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(9.17, 9.17, 9.17); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**Body/Back/Area Scan (61x101x1):** Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 0.263 W/kg

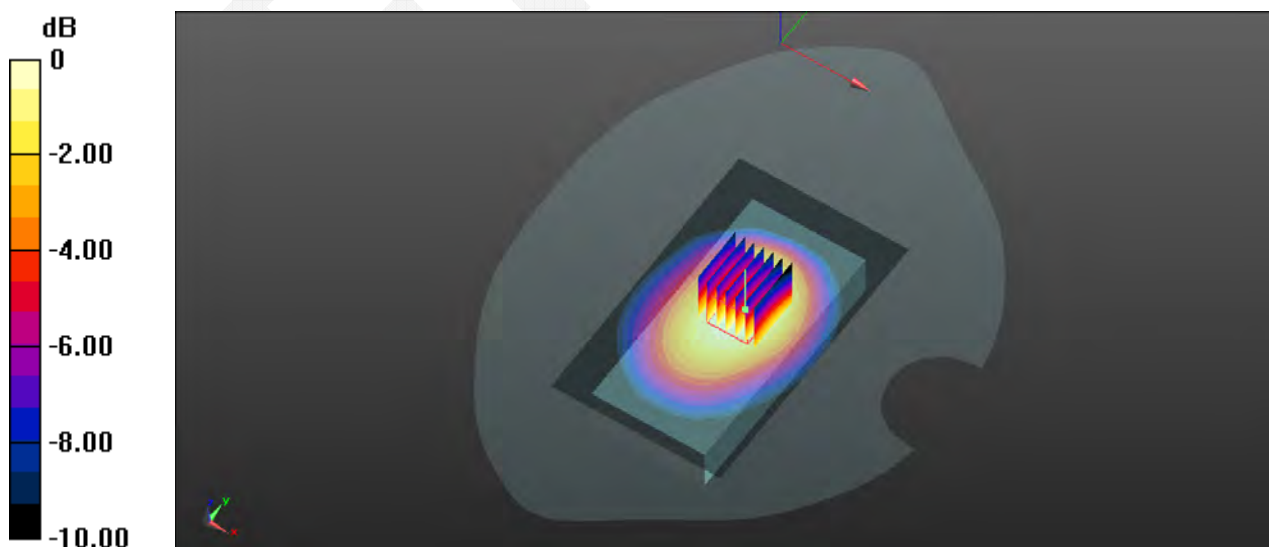
**Body/Back/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 20.17 V/m; Power Drift = -0.14 dB

Peak SAR (extrapolated) = 0.646 W/kg

**SAR(1 g) = 0.477 W/kg; SAR(10 g) = 0.335 W/kg**

Maximum value of SAR (measured) = 0.507 W/kg



0 dB = 0.253 W/kg = -2.95 dBW/kg

**Test Laboratory: Bay Area Compliance Labs Corp. (Dongguan)****Test Plot 3: PCS 1900 Left-Head-Check Low Channel****DUT: Ram Plus; Type: E300**

Communication System: PCS 1900 ; Frequency: 1850.2 MHz; Duty Cycle: 1:8

Medium parameters used:  $f = 1850.2 \text{ MHz}$ ;  $\sigma = 1.36 \text{ S/m}$ ;  $\epsilon_r = 39.844$ ;  $\rho = 1000 \text{ kg/m}^3$ 

Phantom section: Left Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(8.12, 8.12, 8.12); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**Head/Left Cheek/Area Scan (81x141x1):** Interpolated grid:  $dx=1.000 \text{ mm}$ ,  $dy=1.000 \text{ mm}$ 

Maximum value of SAR (interpolated) = 0.0820 W/kg

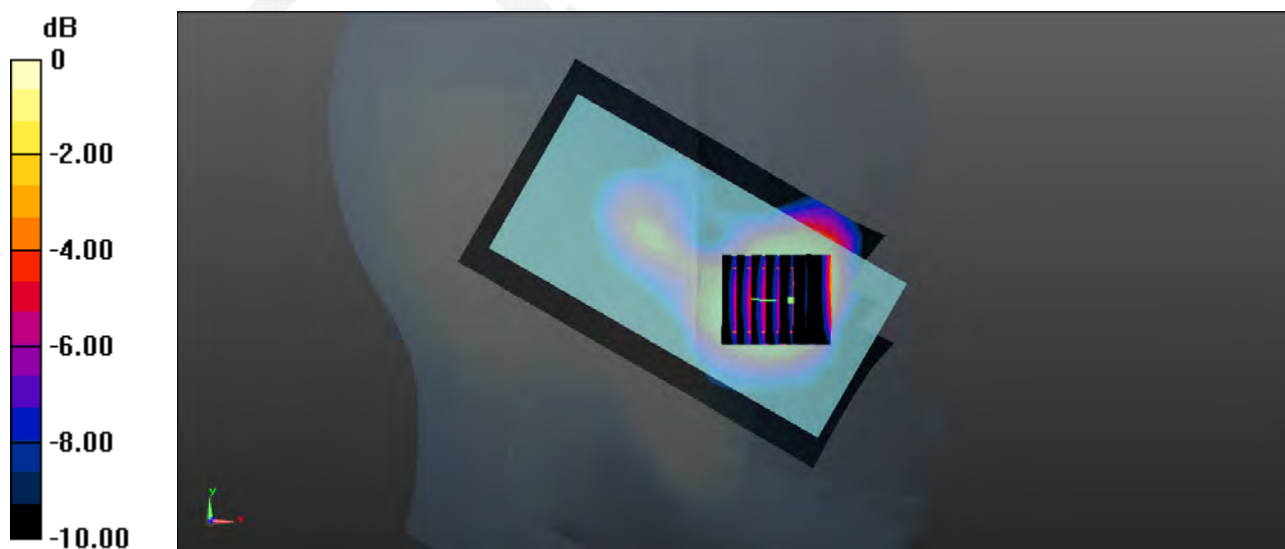
**Head/Left Cheek/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5\text{mm}$ ,  $dy=5\text{mm}$ ,  $dz=5\text{mm}$ 

Reference Value = 4.674 V/m; Power Drift = 0.16 dB

Peak SAR (extrapolated) = 0.234 W/kg

**SAR(1 g) = 0.162 W/kg; SAR(10 g) = 0.093 W/kg**

Maximum value of SAR (measured) = 0.161 W/kg



0 dB = 0.161 W/kg = -7.93 dBW/kg



**Test Laboratory: Bay Area Compliance Labs Corp.(Dongguan)****Test Plot 4: PCS 1900 Body-Back-Worn Low Channel****DUT: Ram Plus; Type: E300**

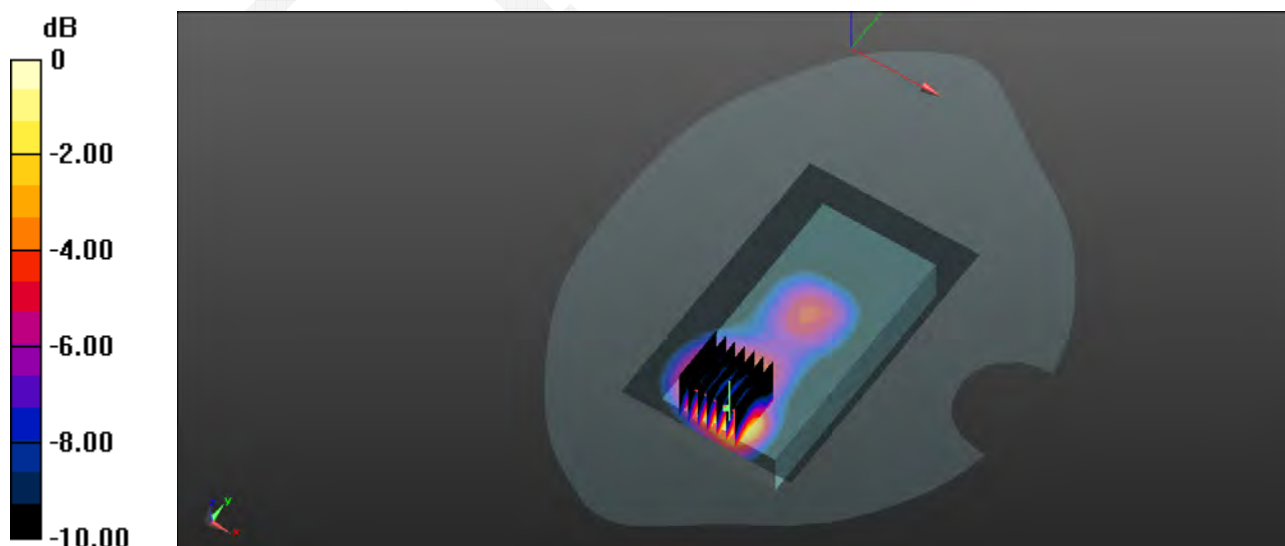
Communication System: GPRS 1900-3 SLOT ; Frequency: 1850.2 MHz; Duty Cycle: 1:2.67

Medium parameters used:  $f = 1850.2 \text{ MHz}$ ;  $\sigma = 1.48 \text{ S/m}$ ;  $\epsilon_r = 55.259$ ;  $\rho = 1000 \text{ kg/m}^3$ 

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.85, 7.85, 7.85); Calibrated: 2015/2/5;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1459; Calibrated: 2015/1/26
- Phantom: SAM (30deg probe tilt) with CRP v5.0\_20150321; Type: QD000P40CD; Serial: TP:1874
- Measurement SW: DASY52, Version 52.8 (8);

**Body/Back/Area Scan (61x101x1):** Interpolated grid:  $dx=1.500 \text{ mm}$ ,  $dy=1.500 \text{ mm}$ Maximum value of SAR (interpolated) =  $0.108 \text{ W/kg}$ **Body/Back/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5\text{mm}$ ,  $dy=5\text{mm}$ ,  $dz=5\text{mm}$ Reference Value =  $6.594 \text{ V/m}$ ; Power Drift =  $-0.13 \text{ dB}$ Peak SAR (extrapolated) =  $0.311 \text{ W/kg}$ **SAR(1 g) =  $0.174 \text{ W/kg}$ ; SAR(10 g) =  $0.091 \text{ W/kg}$** Maximum value of SAR (measured) =  $0.193 \text{ W/kg}$ 0 dB =  $0.193 \text{ W/kg}$  =  $-7.14 \text{ dBW/kg}$

## APPENDIX A MEASUREMENT UNCERTAINTY

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

### Measurement uncertainty evaluation for IEEE1528-2013 SAR test

Source of uncertainty	Tolerance/ uncertainty ± %	Probability distribution	Disisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
<b>Measurement system</b>							
Probe calibration	6.55	N	1	1	1	6.6	6.6
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions–reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
<b>Test sample related</b>							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	6.3	N	1	1	1	6.3	6.3
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
<b>Phantom and set-up</b>							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Liquid conductivity target)	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2
Liquid conductivity meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity target)	5.0	R	$\sqrt{3}$	0.6	0.49	1.7	1.4
Liquid permittivity meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.3	23.9

## Measurement uncertainty evaluation for IEC62209-2 SAR test

Source of uncertainty	Tolerance/ uncertainty ± %	Probability distribution	Disisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
<b>Measurement system</b>							
Probe calibration	6.55	N	1	1	1	6.6	6.6
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Modulation Response	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions–reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
<b>Test sample related</b>							
Device holder Uncertainty	6.3	N	1	1	1	6.3	6.3
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Power scaling	4.5	R	$\sqrt{3}$	1	1	2.6	2.6
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
<b>Phantom and set-up</b>							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Algorithm for correcting SAR for deviations in permittivity and conductivity	1.9	N	1	1	0.84	1.1	0.9
Liquid conductivity (meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity (meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Temp. unc. - Conductivity	1.7	R	$\sqrt{3}$	0.78	0.71	0.8	0.7
Temp. unc. - Permittivity	0.3	R	$\sqrt{3}$	0.23	0.26	0.0	0.0
Combined standard uncertainty		RSS				12.2	12.1
Expanded uncertainty 95 % confidence interval)						24.5	24.2

## APPENDIX B – PROBE CALIBRATION CERTIFICATES

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



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

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

Accreditation No.: **SCS 0108**

Client **BACL China (Vitec)**

Certificate No: **EX3-7329\_Feb15**

### CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:7329**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-23.v5, QA CAL-25.v6  
Calibration procedure for dosimetric E-field probes**

Calibration date: **February 5, 2015**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	03-Apr-14 (No. 217-01911)	Apr-15
Power sensor E4412A	MY41498087	03-Apr-14 (No. 217-01911)	Apr-15
Reference 3 dB Attenuator	SN: S5054 (3c)	03-Apr-14 (No. 217-01915)	Apr-15
Reference 20 dB Attenuator	SN: S6277 (20x)	03-Apr-14 (No. 217-01919)	Apr-15
Reference 30 dB Attenuator	SN: S5129 (30b)	03-Apr-14 (No. 217-01920)	Apr-15
Reference Probe ES3DV2	SN: 3013	30-Dec-14 (No. ES3-3013 Dec14)	Dec-15
DAE4	SN: 660	14-Jan-15 (No. DAE4-660 Jan15)	Jan-16
Secondary Standards	ID	Check Date (in house)	Scheduled Check
RF generator HP 8648C	US3642U01700	4-Aug-99 (in house check Apr-13)	In house check: Apr-16
Network Analyzer HP 8753E	US37390585	16-Oct-01 (in house check Oct-14)	In house check: Oct-15

Calibrated by:	Name <b>Claudio Leubler</b>	Function <b>Laboratory Technician</b>	Signature 
Approved by:	Name <b>Katja Pokovic</b>	Function <b>Technical Manager</b>	Signature 
This calibration certificate shall not be reproduced except in full without written approval of the laboratory.			

Issued: February 9, 2015

Certificate No: EX3-7329\_Feb15

Page 1 of 11



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



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

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

Accreditation No.: **SCS 0108**

#### Glossary:

TSL	tissue simulating liquid
NORM <sub>x,y,z</sub>	sensitivity in free space
ConvF	sensitivity in TSL / NORM <sub>x,y,z</sub>
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization $\phi$	$\phi$ rotation around probe axis
Polarization $\theta$	$\theta$ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\theta = 0$ is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

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

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) for hand-held devices used in close proximity to the ear (frequency range of 300 MHz to 3 GHz)", February 2005

#### Methods Applied and Interpretation of Parameters:

- NORM<sub>x,y,z</sub>**: Assessed for E-field polarization  $\theta = 0$  ( $f \leq 900$  MHz in TEM-cell;  $f > 1800$  MHz: R22 waveguide). NORM<sub>x,y,z</sub> are only intermediate values, i.e., the uncertainties of NORM<sub>x,y,z</sub> does not affect the E<sup>2</sup>-field uncertainty inside TSL (see below ConvF).
- NORM(f)<sub>x,y,z</sub>** = NORM<sub>x,y,z</sub> \* frequency\_response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP<sub>x,y,z</sub>**: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A<sub>x,y,z</sub>; B<sub>x,y,z</sub>; C<sub>x,y,z</sub>; D<sub>x,y,z</sub>; VR<sub>x,y,z</sub>; A, B, C, D** are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for  $f \leq 800$  MHz) and inside waveguide using analytical field distributions based on power measurements for  $f > 800$  MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM<sub>x,y,z</sub> \* ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from  $\pm 50$  MHz to  $\pm 100$  MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle**: The angle is assessed using the information gained by determining the NORM<sub>x</sub> (no uncertainty required).

EX3DV4 – SN:7329

February 5, 2015

# Probe EX3DV4

## SN:7329

Manufactured: December 11, 2014  
Calibrated: February 5, 2015

Calibrated for DASY/EASY Systems  
(Note: non-compatible with DASY2 system!)

Certificate No: EX3-7329\_Feb15

Page 3 of 11

EX3DV4- SN:7329

February 5, 2015

**DASY/EASY - Parameters of Probe: EX3DV4 - SN:7329****Basic Calibration Parameters**

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ( $\mu\text{V}/(\text{V}/\text{m})^2$ ) <sup>A</sup>	0.48	0.43	0.46	$\pm 10.1 \%$
DCP (mV) <sup>B</sup>	96.7	97.6	94.2	

**Modulation Calibration Parameters**

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Unc <sup>E</sup> (k=2)
0	CW	X	0.0	0.0	1.0	0.00	137.9	$\pm 3.0 \%$
		Y	0.0	0.0	1.0		147.0	
		Z	0.0	0.0	1.0		150.5	

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

<sup>A</sup> The uncertainties of NormX,Y,Z do not affect the E<sup>2</sup>-field uncertainty inside TSL (see Pages 5 and 6).

<sup>B</sup> Numerical linearization parameter; uncertainty not required.

<sup>E</sup> Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

EX3DV4- SN:7329

February 5, 2015

**DASY/EASY - Parameters of Probe: EX3DV4 - SN:7329****Calibration Parameter Determined in Head Tissue Simulating Media**

f (MHz) <sup>c</sup>	Relative Permittivity <sup>e</sup>	Conductivity (S/m) <sup>f</sup>	ConvF X	ConvF Y	ConvF Z	Alpha <sup>g</sup>	Depth <sup>g</sup> (mm)	Unct. (k=2)
900	41.5	0.97	9.52	9.52	9.52	0.40	0.86	± 12.0 %
1750	40.1	1.37	8.12	8.12	8.12	0.29	0.90	± 12.0 %
1900	40.0	1.40	7.88	7.88	7.88	0.68	0.61	± 12.0 %
2450	39.2	1.80	7.06	7.06	7.06	0.33	0.84	± 12.0 %

<sup>c</sup> Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

<sup>e</sup> At frequencies below 3 GHz, the validity of tissue parameters ( $\epsilon$  and  $\sigma$ ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters ( $\epsilon$  and  $\sigma$ ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

<sup>g</sup> Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.



EX3DV4- SN:7329

February 5, 2015

## DASY/EASY - Parameters of Probe: EX3DV4 - SN:7329

### Calibration Parameter Determined in Body Tissue Simulating Media

f (MHz) <sup>c</sup>	Relative Permittivity <sup>f</sup>	Conductivity (S/m) <sup>f</sup>	ConvF X	ConvF Y	ConvF Z	Alpha <sup>g</sup>	Depth <sup>g</sup> (mm)	Unct. (k=2)
900	55.0	1.05	9.17	9.17	9.17	0.41	0.90	± 12.0 %
1750	53.4	1.49	7.85	7.85	7.85	0.70	0.64	± 12.0 %
1900	53.3	1.52	7.56	7.56	7.56	0.56	0.70	± 12.0 %
2450	52.7	1.95	7.20	7.20	7.20	0.78	0.59	± 12.0 %

<sup>c</sup> Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

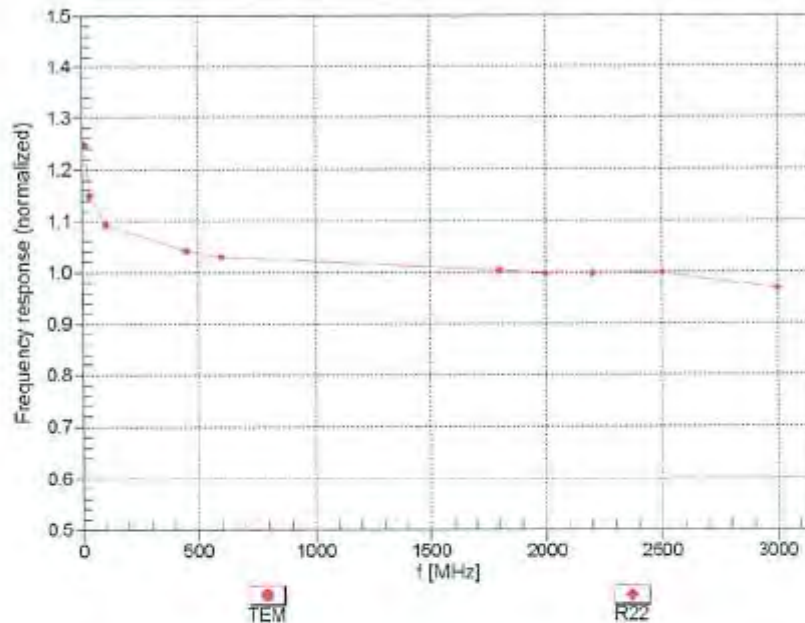
<sup>f</sup> At frequencies below 3 GHz, the validity of tissue parameters ( $\epsilon$  and  $\sigma$ ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters ( $\epsilon$  and  $\sigma$ ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

<sup>g</sup> Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

EX3DV4- SN:7329

February 5, 2015

### Frequency Response of E-Field (TEM-Cell:ifi110 EXX, Waveguide: R22)

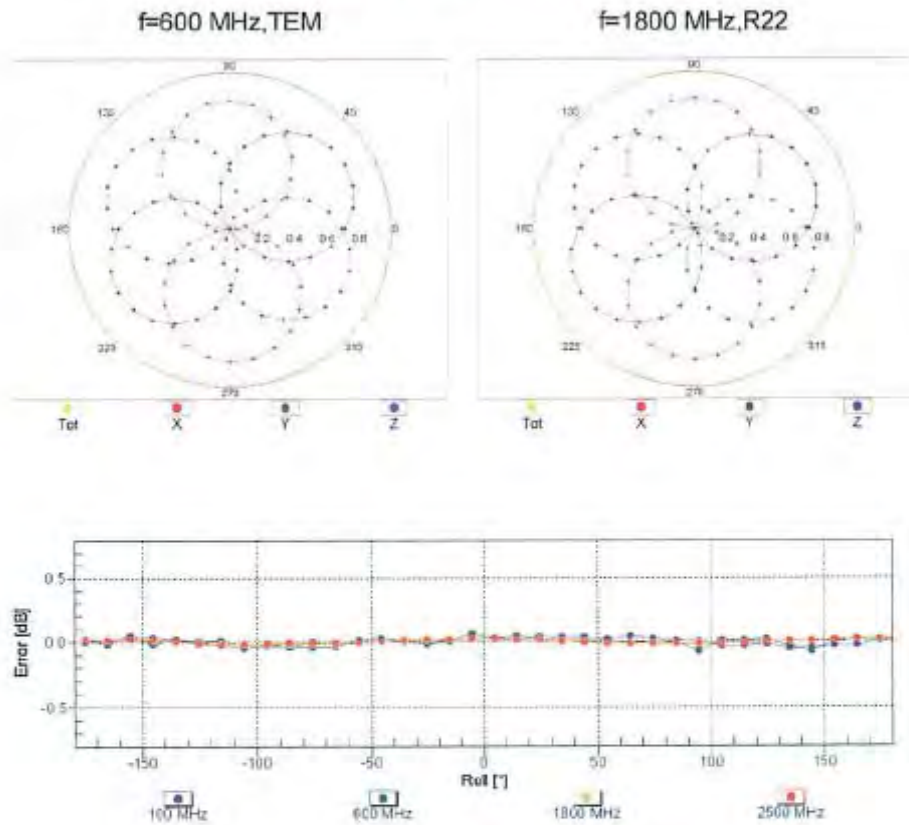


Uncertainty of Frequency Response of E-field:  $\pm 6.3\%$  ( $k=2$ )

EX3DV4- SN:7329

February 5, 2015

### Receiving Pattern ( $\phi$ ), $\theta = 0^\circ$

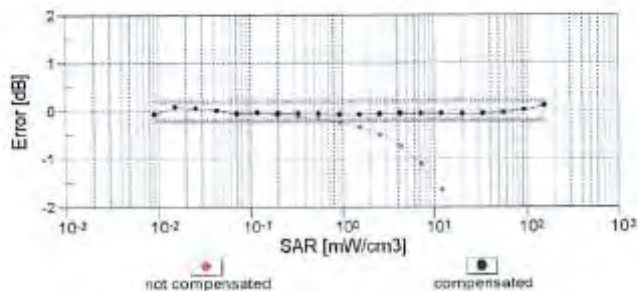
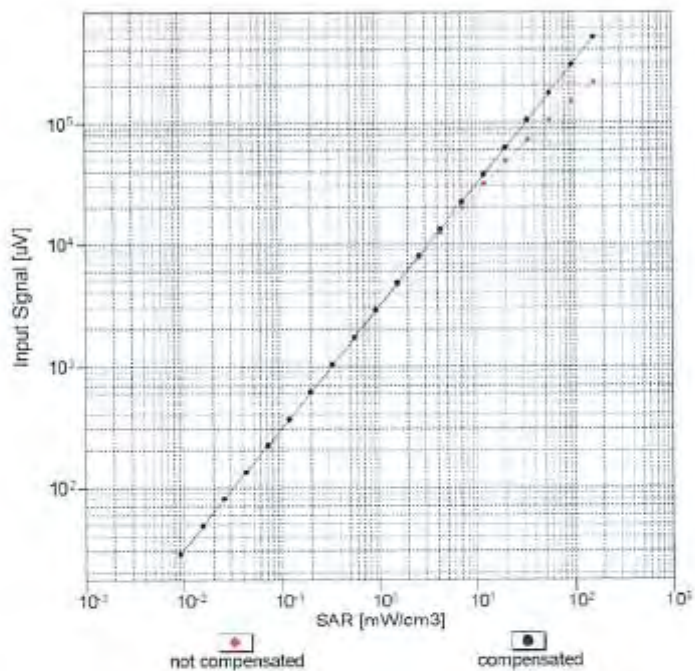


Uncertainty of Axial Isotropy Assessment:  $\pm 0.5\%$  ( $k=2$ )

EX3DV4- SN:7329

February 5, 2015

### Dynamic Range $f(\text{SAR}_{\text{head}})$ (TEM cell, $f_{\text{eval}} = 1900 \text{ MHz}$ )

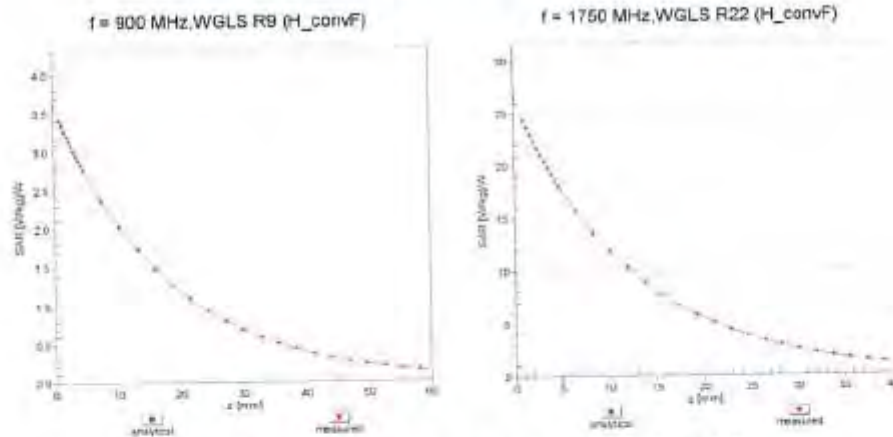


Uncertainty of Linearity Assessment:  $\pm 0.6\%$  ( $k=2$ )

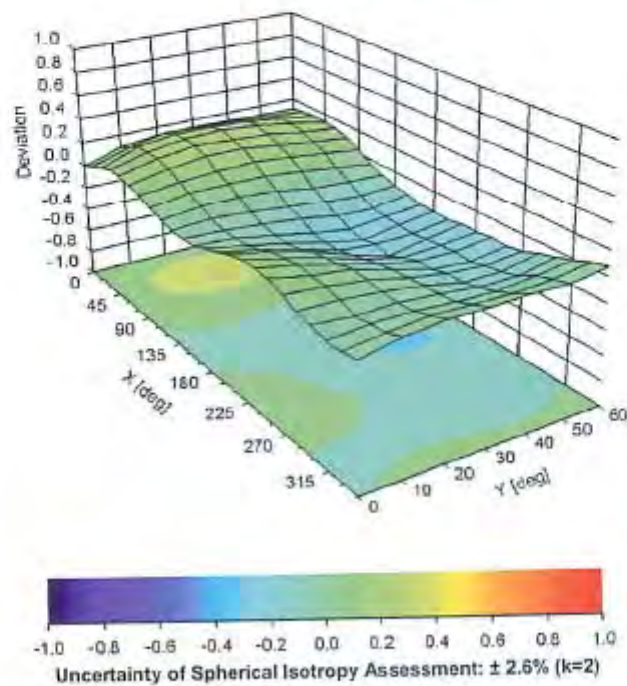
EX3DV4- SN:7329

February 5, 2015

## Conversion Factor Assessment



## Deviation from Isotropy in Liquid Error ( $\phi, \theta$ ), $f = 900 \text{ MHz}$



EX3DV4- SN:7329

February 5, 2015

**DASY/EASY - Parameters of Probe: EX3DV4 - SN:7329****Other Probe Parameters**

Sensor Arrangement	Triangular
Connector Angle (°)	24.5
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm



## APPENDIX C DIPOLE CALIBRATION CERTIFICATES

### NCL CALIBRATION LABORATORIES

Calibration File No: DC-1599  
Project Number: BAC-dipole-cal-5779

## 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(Head and Body)

Manufacturer: APREL Laboratories

Part number: ALS-D-835-S-2

Frequency: 835 MHz

Serial No: 180-00558

Customer: Bay Area Compliance Laboratory (China)

Calibrated: 8<sup>th</sup> October 2014  
Released on: 8<sup>th</sup> October 2014

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

Released By:



Art Brennan, Quality Manager

### **NCL** CALIBRATION LABORATORIES

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

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

**NCL Calibration Laboratories**

Division of APREL Laboratories.

**Conditions**

Dipole 180-00558 was received with a damaged connection for a re-calibration.

**Ambient Temperature of the Laboratory:** 22 °C +/- 0.5°C  
**Temperature of the Tissue:** 21 °C +/- 0.5°C

**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  
\_\_\_\_\_  
Maryna Nesterova Calibration Engineer**Primary Measurement Standards**

Instrument	Serial Number	Cal due date
Tektronix USB Power Meter	11C940	May 14, 2015
Network Analyzer Anritsu 37347C	002106	Feb. 20, 2015

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



**NCL Calibration Laboratories**

Division of APREL Laboratories.

**Calibration Results Summary**

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

**Mechanical Dimensions**

Length: 162.2 mm

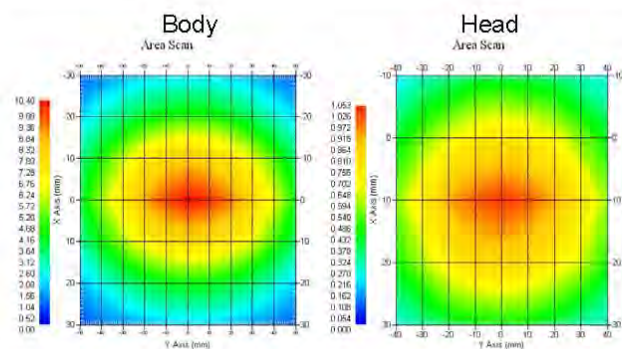
Height: 89.4 mm

**Electrical Specification**

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	835 MHz	1.066 U	-30.344 dB	49.001 $\Omega$
Body	835 MHz	1.089 U	-28.118 dB	53.117 $\Omega$

**System Validation Results**

Tissue	Frequency	1 Gram	10 Gram	Peak
Head	835 MHz	9.773	6.174	14.713
Body	835 MHz	9.736	6.297	14.513



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**NCL Calibration Laboratories**

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 180-00558. 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 30 MHz to 6 GHz E-Field Probe Serial Number 225.

**References**

- IEC-62209 "Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Human models, instrumentation, and procedures"
- Part 2: "Procedure to determine the Specific Absorption Rate (SAR) for hand-held devices used in close proximity of the ear (frequency range of 30 MHz to 6 GHz)"
- TP-D01-032-E020-V2 E-Field probe calibration procedure
- D22-012-Tissue dielectric tissue calibration procedure
- 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

**Conditions**

Dipole 180-00558 was repaired prior to this calibration. The repair reliability depends upon correct usage of the dipole.

**Ambient Temperature of the Laboratory:** 22 °C +/- 0.5°C

**Temperature of the Tissue:** 20 °C +/- 0.5°C

**Dipole Calibration uncertainty**

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

<b>Mechanical</b>	1%
<b>Positioning Error</b>	1.22%
<b>Electrical</b>	1.7%
<b>Tissue</b>	2.2%
<b>Dipole Validation</b>	2.2%
<b>TOTAL</b>	<b>8.32% (16.64% K=2)</b>

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**Dipole Calibration Results****Mechanical Verification**

APREL Length	APREL Height	Measured Length	Measured Height
161.0 mm	89.8 mm	162.2 mm	89.4 mm

**Electrical Verification**

Tissue Type	Return Loss:	SWR:	Impedance:
Head	-30.344 dB	1.066 U	49.001 $\Omega$
Body	-28.118 dB	1.089 U	53.117 $\Omega$ □

**Tissue Validation**

	Dielectric constant, $\epsilon_r$	Conductivity, $\sigma$ [S/m]
Head Tissue 835MHz	43.42	0.94
Body Tissue 835MHz	55.77	1.01

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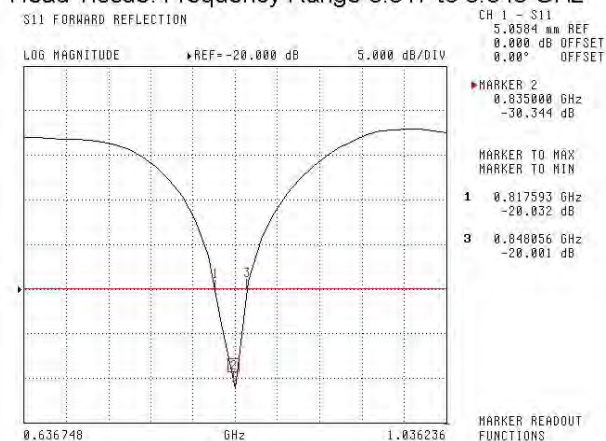
**NCL Calibration Laboratories**

Division of APREL Laboratories.

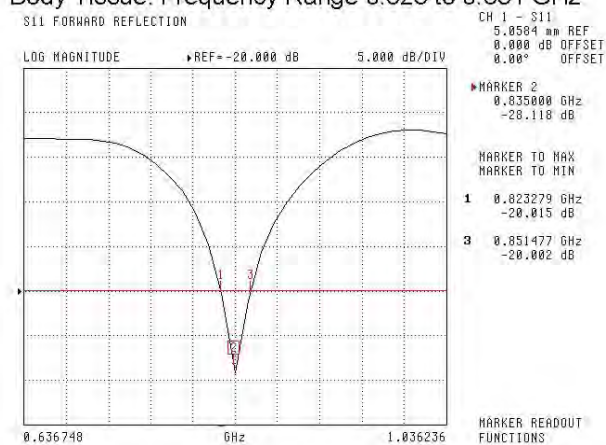
The Following Graphs are the results as displayed on the Vector Network Analyzer.

**S11 Parameter Return Loss**

Head Tissue: Frequency Range 0.817 to 0.848 GHz



Body Tissue: Frequency Range 0.823 to 0.851 GHz



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**SWR****Head**

S11 FORWARD REFLECTION



CH 1 - S11  
5.0584 mm REF  
0.000 dB OFFSET  
0.00° OFFSET

MARKER 2  
0.835000 GHz  
1.066 U

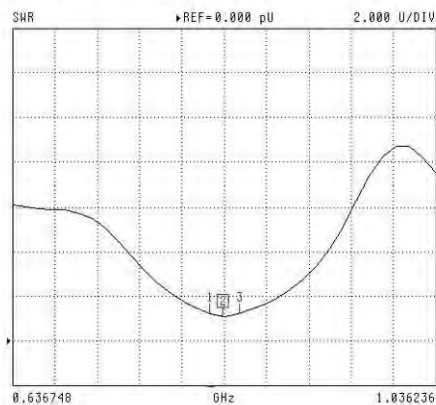
MARKER TO MAX  
MARKER TO MIN

1 0.817593 GHz  
1.251 U  
3 0.835000 GHz  
1.235 U

MARKER READOUT  
FUNCTIONS

**Body**

S11 FORWARD REFLECTION



CH 1 - S11  
5.0584 mm REF  
0.000 dB OFFSET  
0.00° OFFSET

MARKER 2  
0.835000 GHz  
1.069 U

MARKER TO MAX  
MARKER TO MIN

1 0.823279 GHz  
1.226 U  
3 0.835000 GHz  
1.234 U

MARKER READOUT  
FUNCTIONS

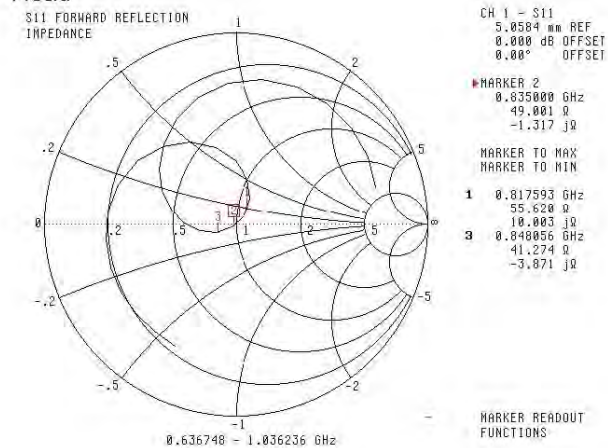
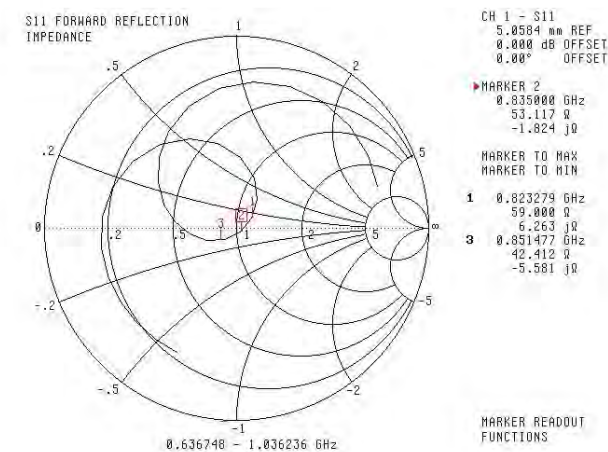
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**NCL Calibration Laboratories**

Division of APREL Laboratories.

**Smith Chart Dipole Impedance****Head****Body**

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**NCL Calibration Laboratories**

Division of APREL Laboratories.

**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 2014.

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## NCL CALIBRATION LABORATORIES

Calibration File No: DC-1601  
Project Number: BAC-dipole -cal-5779

# 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 (Head & Body)

Manufacturer: APREL Laboratories

Part number: ALS-D-1900-S-2

Frequency: 1900 MHz


Serial No: 210-00710

Customer: Bay Area Compliance Laboratory (China)

Calibrated: 9<sup>th</sup> October, 2014  
Released on: 9<sup>th</sup> October, 2014

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

Released By:



Art Brennan, Quality Manager

### **NCL** CALIBRATION LABORATORIES

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

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



**NCL Calibration Laboratories**

Division of APREL Laboratories.

**Conditions**

Dipole 210-00710 was received in good condition and was a re-calibration.



**Ambient Temperature of the Laboratory:** 22 °C +/- 0.5°C

**Temperature of the Tissue:** 21 °C +/- 0.5°C

**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  
-----  
Maryna Nesterova Calibration Engineer**Primary Measurement Standards**

<b>Instrument</b>	<b>Serial Number</b>	<b>Cal due date</b>
Tektronix USB Power Meter	11C940	May 14, 2015
Network Analyzer Anritsu 37347C	002106	Feb. 20, 2015

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

**NCL Calibration Laboratories**

Division of APREL Laboratories.

**Calibration Results Summary**

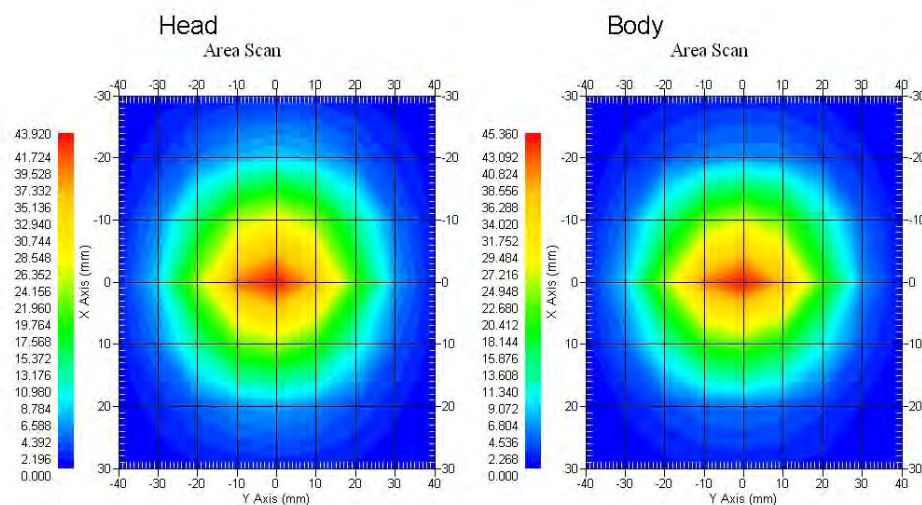
The following results relate the Calibrated Dipole and should be used as a quick reference for the user.

**Mechanical Dimensions****Length:** 67.1 mm**Height:** 38.9 mm**Electrical Specification**

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	1900MHz	1.084 U	-27.92 dB	52.247 $\Omega$
Body	1900MHz	1.128 U	-24.40 dB	52.618 $\Omega$

**System Validation Results**

Tissue	Frequency	1 Gram	10 Gram	Peak
Head	1900 MHz	39.481	20.44	73.364
Body	1900 MHz	39.715	20.552	73.565



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**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 210-00710. 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 30 MHz to 6 GHz E-Field Probe Serial Number 225.

**References**

- IEC-62209 "Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Human models, instrumentation, and procedures"
- Part 2: "Procedure to determine the Specific Absorption Rate (SAR) for hand-held devices used in close proximity of the ear (frequency range of 30 MHz to 6 GHz)"
- TP-D01-032-E020-V2 E-Field probe calibration procedure
- D22-012-Tissue dielectric tissue calibration procedure
- 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

**Conditions**

Dipole 210-00710 was a recalibration.

**Ambient Temperature of the Laboratory:** 22 °C +/- 0.5°C

**Temperature of the Tissue:** 20 °C +/- 0.5°C

**Dipole Calibration uncertainty**

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

<b>Mechanical</b>	1%
<b>Positioning Error</b>	1.22%
<b>Electrical</b>	1.7%
<b>Tissue</b>	2.2%
<b>Dipole Validation</b>	2.2%
<b>TOTAL</b>	<b>8.32% (16.64% K=2)</b>

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**Dipole Calibration Results****Mechanical Verification**

APREL Length	APREL Height	Measured Length	Measured Height
68.0 mm	39.5 mm	67.1mm	38.9 mm

**Electrical Validation**

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	1900MHz	1.084 U	-27.92 dB	52.247 $\Omega$
Body	1900MHz	1.128 U	-24.40 dB	52.618 $\Omega$

**Tissue Validation**

	Dielectric constant, $\epsilon_r$	Conductivity, $\sigma$ [S/m]
Head Tissue 1900MHz	40.20	1.38
Body Tissue 1900MHz	52.63	1.46

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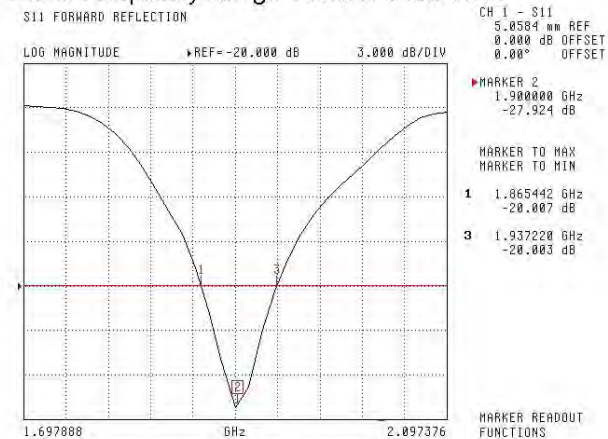
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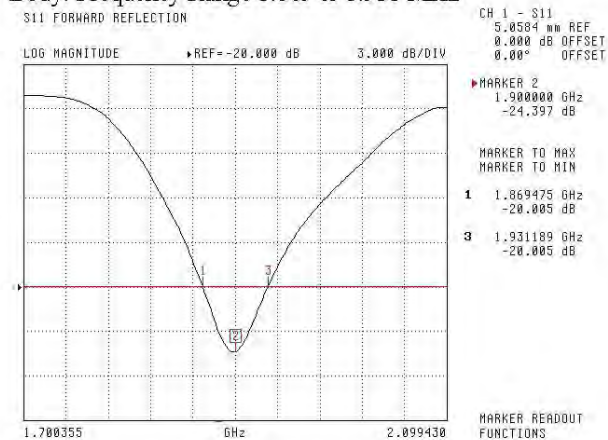
The Following Graphs are the results as displayed on the Vector Network Analyzer.

**S11 Parameter Return Loss**

Head: Frequency Range 1.865 to 1.937 GHz



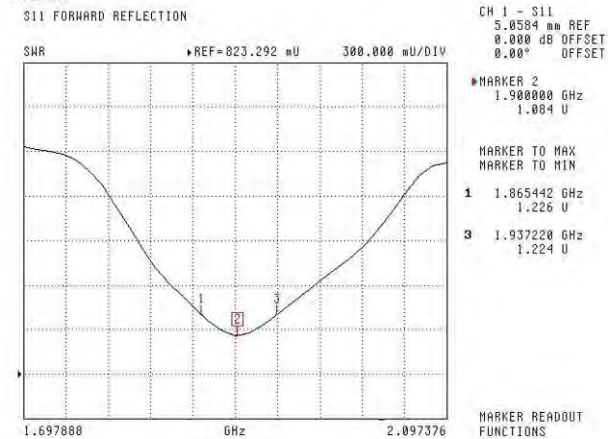
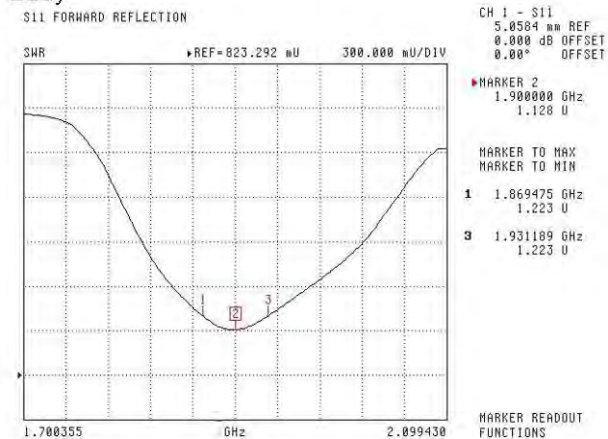
Body: Frequency Range 1.869 to 1.931 MHz



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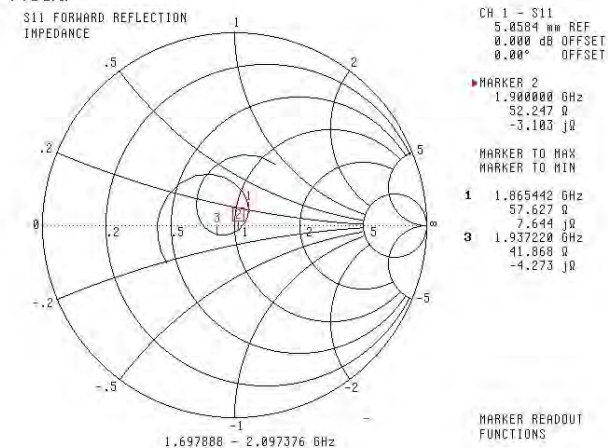
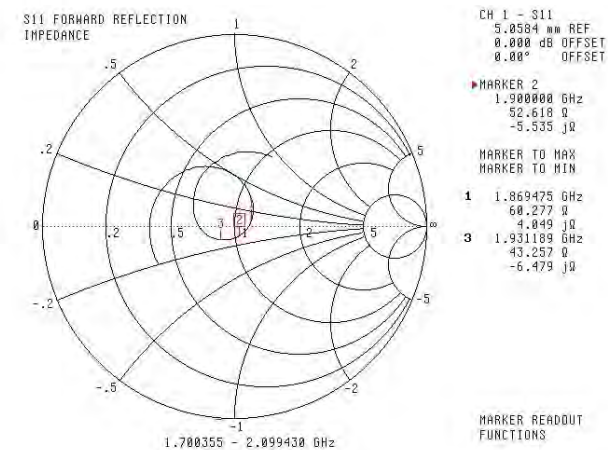
**SWR****Head****Body**

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**Smith Chart Dipole Impedance****Head****Body**

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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 2014

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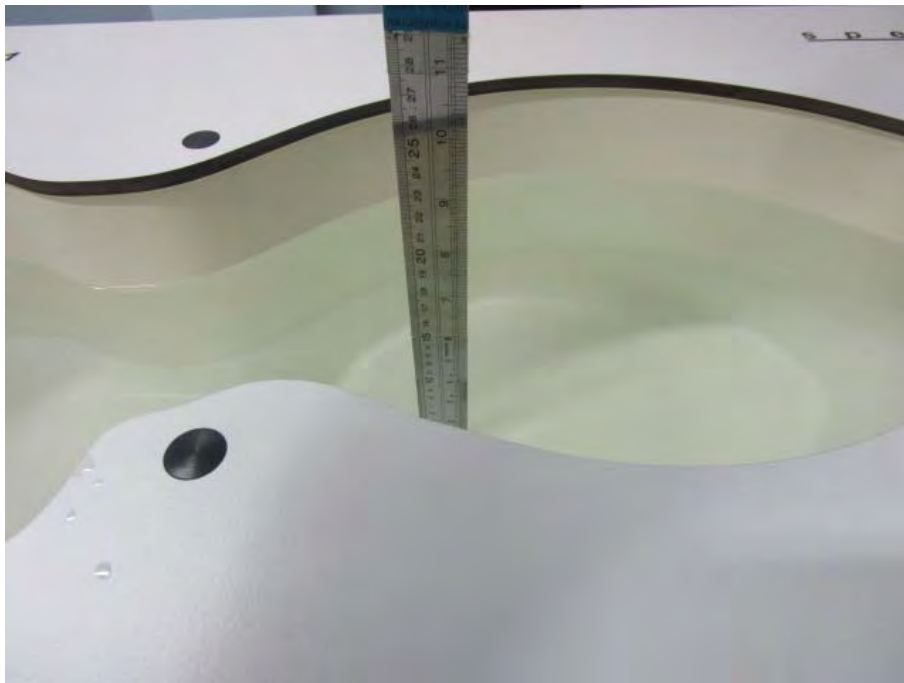
9



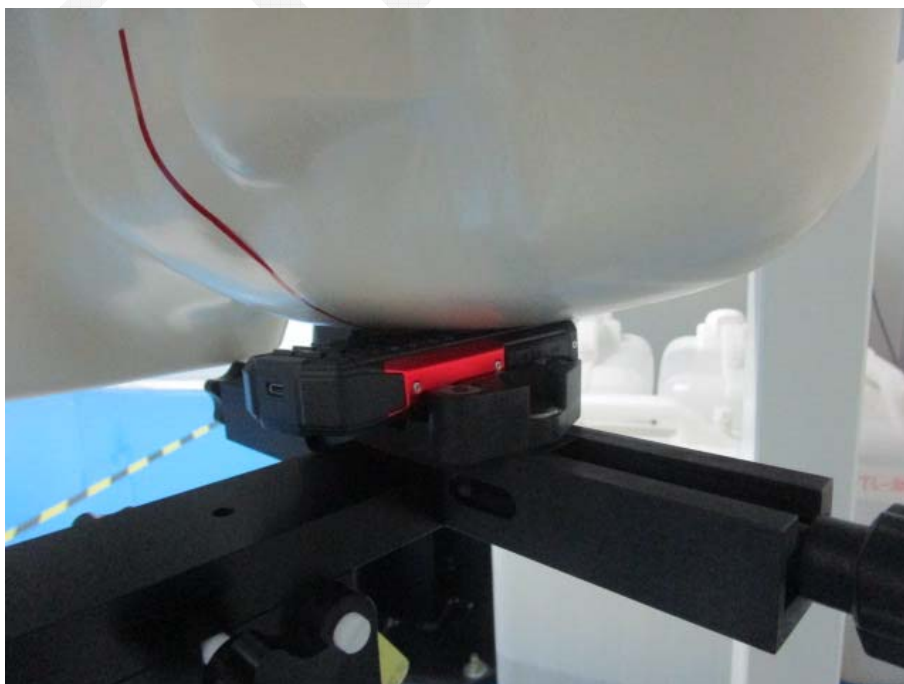
## APPENDIX D EUT TEST POSITION PHOTOS

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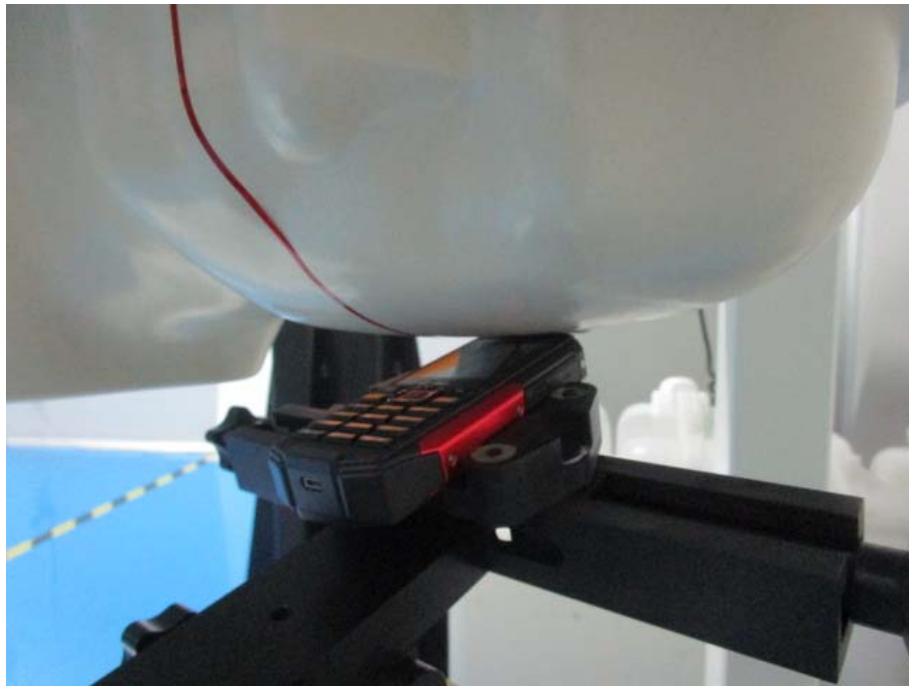
**Liquid depth  $\geq 15\text{cm}$**



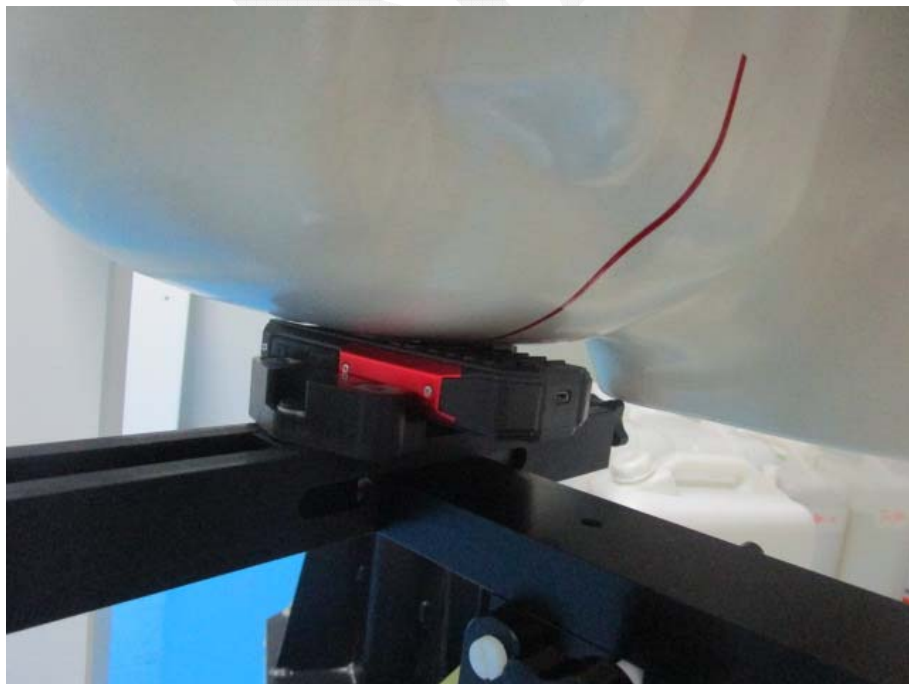
**Left Head Cheek**



### Left Head Tilt



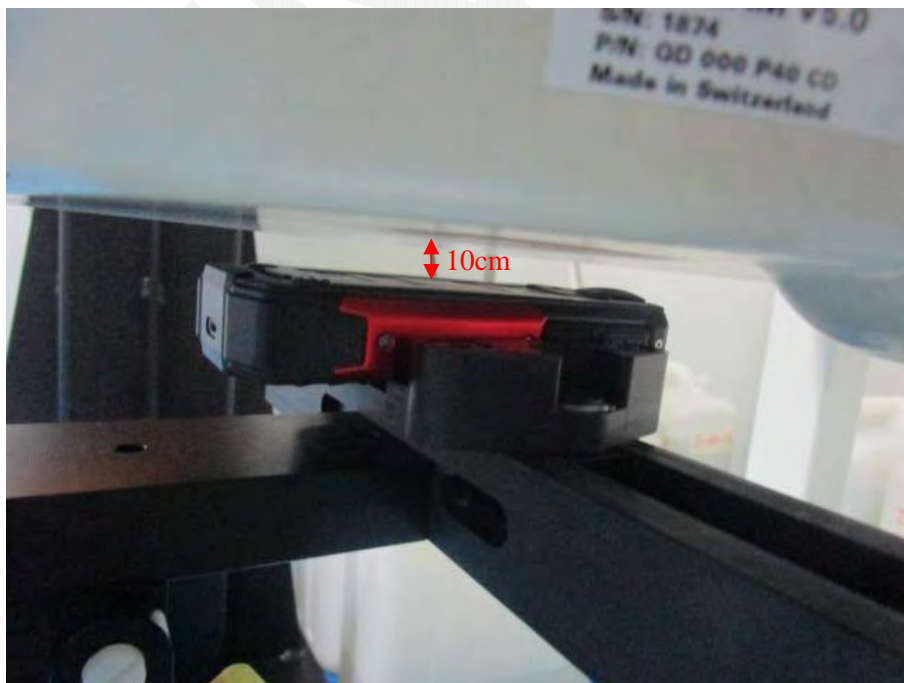
### Right Head Cheek



### Right Head Tilt



### Body -Worn-Back (10mm)





## APPENDIX E EUT PHOTOS

**EUT – Front View**



**EUT – Back View**





**EUT –Left Side View**



**EUT – Right Side View**



**EUT –Top Side View**

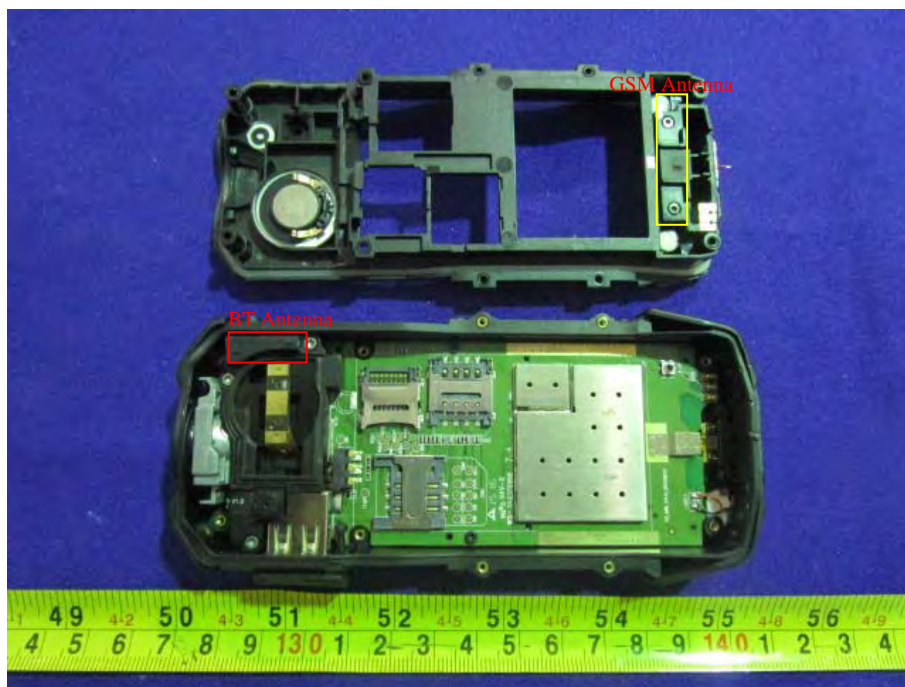


**EUT – Bottom Side View**





### EUT – Uncover View



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