Report No: KS100602B05-SF FCCID: YHR-RQ101

Date of Issue: June 4, 2010

ANSI/IEEE Std. C95.1-1992

In accordance with the requirements of FCC Report and Order: ET Docket 93-62, and OET Bulletin 65 Supplement C

FCC SAR TEST REPORT

For

GSM Mobile Phone

Model No.: RQ101

Trade Name: RAGE

Test Report Number: KS100602B05-SF

Prepared for SUNSTRIKE INTERNATIONAL LIMITED

7th Floor ,Unit C ,Gemstar Tower, 23 Man Lok Street , Hunghom, Kowloon, Hong Kong

Issued by

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Report No: KS100602B05-SF FCCID: YHR-RQ101

Date of Issue: June 4, 2010

TABLE OF CONTENTS

1. 2.	EUT DESCRIPTIONEUT DESCRIPTION	
3. 4.	REQUIREMENTS FOR COMPLIANCE TESTING DEFINED BY THE FCC	5
4. 5. 6.	Test Configuration DOSIMETRIC ASSESSMENT SETUP	5
	6.1 MEASUREMENT SYSTEM DIAGRAM	7
7. 8.	6.2 SYSTEM COMPONENTS	10
9. 10.	EXPOSURE LIMITEUT ARRANGEMENT	
	10.1ANTHROPOMORPHIC HEAD PHANTOM	16
	10.2DEFINITION OF THE "CHEEK/TOUCH" POSITION	17
11.	10.3DEFINITION OF THE "TILTED" POSITION	
	11.1TEST LIQUIDS CONFIRMATION	19
	11.2SYSTEM PERFORMANCE CHECK	20
	11.3EUT TUNE-UP PROCEDURES AND TEST MODE	22
	11.4RF POWER OUTPUT	23
	11.5EUT SETUP PHOTOS	24
	11.6SAR MEASUREMENT RESULTS	31
12. 13. 14.	EQUIPMENT LIST & CALIBRATION STATUS FACILITIES REFERENCES	39
15.	ATTACHMENTS	



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

1. CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

Product

GSM Mobile Phone

name:

RQ101

Trade name:

Model No.:

RAGE

Description:

The EUT was scanned during the preliminary test, then the SIM1 was found

to transmit the highest SAR value after tested dual SIM1 and SIM2.

Device Category: PORTABLE DEVICES

Exposure Category:

GENERAL POPULATION/UNCONTROLLED EXPOSURE

Date of Test:

June 4, 2010

SUNSTRIKE INTERNATIONAL LIMITED

Applicant:

7th Floor ,Unit C ,Gemstar Tower, 23 Man Lok Street , Hunghom, Kowloon,

Hong Kong

SUNSTRIKE INTERNATIONAL LIMITED

Manufacturer:

7th Floor ,Unit C ,Gemstar Tower, 23 Man Lok Street , Hunghom, Kowloon,

Hong Kong

Application Type: Certification

APPLICABLE STANDARDS AND TEST PROCEDURES						
STANDARDS AND TEST PROCEDURES	TEST RESULT					
FCC OET Bulletin 65 Supplement C and the following specific Test Procedures: o KDB 248227 D01 SAR measurement procedures for 802.11 a/b/g transmitters o KDB 648474 D01 SAR evaluation considerations for handsets with multiple transmitters and antennas	Pass					
Deviation from Applicable Standard						
None						

The device was tested by Compliance Certification Services Inc. in accordance with the measurement methods and procedures specified in OET Bulletin 65 Supplement C(Edition 01-01). The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

Approved by: Reviewed by:

Miro Chueh

EMC Manager

Compliance Certification Services Inc.

Lin Zhang

EMC Section Manager

Compliance Certification Services Inc.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

2. EUT DESCRIPTION

Product	GSM Mobile Phone			
Model Number	RQ101			
Trade Name	RAGE			
FCC ID	YHR-RQ101			
Description	Test Sample is a: Production unit			
Frequency Range	GSM / GPRS:850: 824.2 ~ 848.8 MHz GSM / GPRS:1900: 1850.2 ~ 1909.8 MHz Bluetooth: 2402 ~ 2483.5 MHz			
Operating Mode	Maximum continuous output			
Transmit Power(Average)	GSM850 Band: GSM 850: 32.87 dBm GPRS 850: 32.64 dBm GSM1900 Band: GSM 1900: 29.77 dBm GPRS 1900: 29.74 dBm Bluetooth:0.87 dBm			
Max. SAR	GSM 850: 0.87W/kg GSM 1900: 0.55W/kg			
Modulation Technique	GSM / GPRS : GMSK Bluetooth:FHSS			
Accessories	Charger: Model: RQ 101 Input:100-240V~50/60Hz Output:5.2V 500mA Battery: Standard Voltage:3.7V Rating Capacity:1200mAh Charging voltage 4.2V			



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

3. REQUIREMENTS FOR COMPLIANCE TESTING DEFINED BY THE FCC

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996. The 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 for an uncontrolled environment and 8.0 mW/g for an occupational/controlled environment as recommended by the ANSI/IEEE standard C95.1-1992. 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.

4. APPLIED STANDARDS

The tests documented in this report were performed in accordance with FCC OET Bulletin 65 Supplement C the following specific FCC Test Procedures.
o KDB 248227 D01 SAR measurement procedures for 802.11 a/b/g transmitters
o KDB 648474 D01 SAR evaluation considerations for handsets with multiple transmitters and antennas

5. TEST CONFIGURATION

The device was controlled by using a base station emulator R&S CMU200. Communication between the device and the emulator was established by air link. The distance between the DUT and the antenna of the emulator is larger than 50 cm and the output power radiated from the emulator antenna is at least 30 dB smaller than the output power of DUT. The DUT was set from the emulator to radiate maximum output power during all tests.

Measurements were performed on the lowest, middle, and highest channel for each testing position.

For SAR testing, EUT is in GSM/GPRS link mode. In GSM link mode, its crest factor is 8, In GPRS link mode, its crest factor is 4, because EUT is set in GPRS multi-slot class 10 with 2 uplink slots.

6. DOSIMETRIC ASSESSMENT SETUP

These measurements were performed with the automated near-field scanning system OPENSAR from ATTENNESSA. The system is based on a high precision robot (working range greater than $0.9 \, \mathrm{m}$), which positions the probes with a positional repeatability of better than $\pm 0.02 \, \mathrm{mm}$. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The SAR measurements were conducted with the dosimetric probe EP100 1109 (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure described in [7] with accuracy of better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure described in [8] and found to be better than $\pm 0.25 \, \mathrm{dB}$. The phantom used was the SAM Twin Phantom as described in FCC supplement C, IEE P1528 and CENELEC EN50361.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

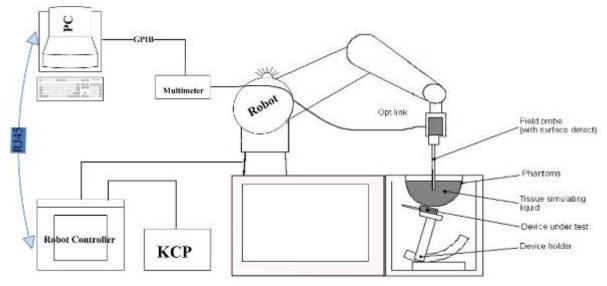
The Tissue simulation liquid used for each test is in according with the FCC OET65 supplement C as listed below.

Ingredients	Frequency (MHz)									
(% by weight)	4:	50	83	35	915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (S/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

6.1 MEASUREMENT SYSTEM DIAGRAM



The OPENSAR system for performing compliance tests consist of the following items:

- 1. A standard high precision 6-axis robot (KUKA) with controller and software.
- 2. KUKA Control Panel (KCP).
- 3. A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- 4. The functions of the PC plug-in card are to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
- 5. A computer operating Windows 95.
- 6. OPENSAR software.
- 7. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
- 8. The SAM phantom enabling testing left-hand right-hand and body usage.
- 9. The Position device for handheld EUT.
- 10. Tissue simulating liquid mixed according to the given recipes (see Application Note). System validation dipoles to validate the proper functioning of the system.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

6.2 SYSTEM COMPONENTS

SN11/09 EP100 Probe Specification

Construction Symmetrical design with triangular core Built-in optical fiber for surface detection System Built-in shielding against static charges

Calibration in air from 100 MHz to 2.5 GHz

In brain and muscle simulating tissue at frequencies of 835 MHz, 897MHz ,1747 MHz,1880 MHz,1950 MHz and 1.8 GHz (accuracy of \pm 8%)

Frequency 100 MHz to > 30GHz; Linearity: \pm 0.25 dB (100 MHz to 30 GHz)

Directivity \pm 0.25 dB in brain tissue (rotation around probe axis)

± 0.5 dB in brain tissue (rotation normal probe axis)

Dynamic 0.001W/kg to > 100 W/kg;

Range Linearity: ± 0.25 dB

Surface \pm 0.2 mm repeatability in air and clear liquids

Detection over diffuse reflecting surfaces Dimensions Overall length: 330 mm

Tip length: 16 mm Body diameter: 8 mm Tip diameter: 6.5 mm

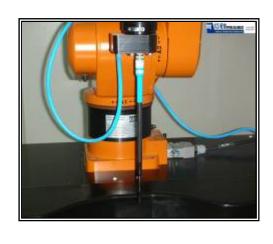
Distance from probe tip to dipole centers: <2.7 mm

Application General dosimetric up to 3 GHz

Compliance tests of mobile phones

Fast automatic scanning in arbitrary phantoms

The SAR measurements were conducted with the dosimetric probe SN11/09 EP100designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe is constructed using the thick film technique, with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi-fiber line ending at the front of the probe tip. It is connected to the KRC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the





Inside View of SN11/09 EP100 E-field Probe

reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The OPENSAR software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped when reaching the maximum.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

E-Field Probe Calibration Process

Each probe is calibrated according to a dosimetric assessment procedure described in [6] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [7] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies bellow 1 GHz, and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the

appropriate simulated brain tissue. The measured free space E-field in the medium correlates to in dielectric medium. temperature rise temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

SAM Phantom

The SAM Phantom SAM29 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN62209-1. The phantom enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

Filling Volume: Approx. 25 liters

Dimensions (H x L x W): 810 x 1000 x 500 mm

Shell Thickness: 2 ± 0.2 mm

Device Holder for Transmitters

In combination with the Generic Twin Phantom V3.0, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produced infinite number of configurations [10]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.



SAM Phantom



7. EVALUATION PROCEDURES

DATA EVALUATION

The OPENSAR4 post processing software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters: - Sensitivity Norm_i, a_{i0} , a_{i1} , a_{i2}

Conversion factor ConvF_i
 Diode compression point dcp_i

Device parameters: - Frequency f

- Crest factor cf

Media parameters: - Conductivity σ

- Density ho

These parameters must be set correctly in the software. They can be found in the component documents or be imported into the software from the configuration files issued for the OPENSAR components. In the direct measuring mode of the multi-meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

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

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

 U_i = Input signal of channel i (i = x, y, z)

cf = Crest factor of exciting field (OPENSAR parameter)
dcp_i = Diode compression point (OPENSAR parameter)

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

E-field probes: $E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$

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

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

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

 $\mu V/(V/m)^2$ for E0field Probes

ConvF= Sensitivity enhancement in solution

aij = Sensor sensitivity factors for H-field probes

f = Carrier frequency (GHz)

Ei = Electric field strength of channel i in V/m

Hi = Magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$\boldsymbol{E}_{tot} = \sqrt{\boldsymbol{E}_{x}^{2} + \boldsymbol{E}_{y}^{2} + \boldsymbol{E}_{z}^{2}}$$

The primary field data are used to calculate the derived field units.

Page 10 of 40 Rev. 00



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

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

with SAR = local specific absorption rate in mW/g

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

 σ = conductivity in [mho/m] or [Siemens/m]

 ρ = equivalent tissue density in g/cm³

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

The power flow density is calculated assuming the excitation field as a free space field.

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

with P_{pwe} = Equivalent power density of a plane wave in mW/cm²

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

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



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

SAR EVALUATION PROCEDURES

The procedure for assessing the peak spatial-average SAR value consists of the following steps:

Power Reference Measurement

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a finer measurement around the hot spot. The sophisticated interpolation routines implemented in OPENSAR software can find the maximum locations even in relatively coarse grids. The scan area is defined by an editable grid. This grid is anchored at the grid reference point of the selected section in the phantom. When the area scan's property sheet is brought-up, grid was at to 15 mm by 15 mm and can be edited by a user.

Zoom Scan

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default zoom scan measures $5 \times 5 \times 7$ points within a cube whose base faces are centered around the maximum found in a preceding area scan job within the same procedure. If the preceding Area Scan job indicates more then one maximum, the number of Zoom Scans has to be enlarged accordingly (The default number inserted is 1).

Power Drift measurement

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have OPENSAR software stop the measurements if this limit is exceeded.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

SPATIAL PEAK SAR EVALUATION

The procedure for spatial peak SAR evaluation has been implemented according to the IEEE1529 standard. It can be conducted for 1 g and 10 g.

The OPENSAR4 system allows evaluations that combine measured data and robot positions, such as:

- · maximum search
- extrapolation
- · boundary correction
- peak search for averaged SAR

During a maximum search, global and local maximum searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard's method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

Extrapolation

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation.

Extrapolation routines require at least 10 measurement points in 3-D space. They are used in the Cube Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard's method for extrapolation. For a grid using 5x5x7 measurement points with 5mm resolution amounting to 343 measurement points, the uncertainty of the extrapolation routines is less than 1% for 1 g and 10 g cubes.

Boundary effect

For measurements in the immediate vicinity of a phantom surface, the field coupling effects between the probe and the boundary influence the probe characteristics. Boundary effect errors of different dosimetric probe types have been analyzed by measurements and using a numerical probe model. As expected, both methods showed an enhanced sensitivity in the immediate vicinity of the boundary. The effect strongly depends on the probe dimensions and disappears with increasing distance from the boundary. The sensitivity can be approximately given as:

$$S \approx S_o + S_b exp(-\frac{z}{a})cos(\pi \frac{z}{\lambda})$$

Since the decay of the boundary effect dominates for small probes ($a << \lambda$), the cos-term can be omitted. Factors Sb (parameter Alpha in the OPENSAR software) and a (parameter Delta in the OPENSAR software) are assessed during probe calibration and used for numerical compensation of the boundary effect. Several simulations and measurements have confirmed that the compensation is valid for different field and boundary configurations.

This simple compensation procedure can largely reduce the probe uncertainty near boundaries. It works well as long as:

- the boundary curvature is small
- the probe axis is angled less than 30_ to the boundary normal
- the distance between probe and boundary is larger than 25% of the probe diameter
- the probe is symmetric (all sensors have the same offset from the probe tip)

Since all of these requirements are fulfilled in a OPENSAR system, the correction of the probe boundary effect in the vicinity of the phantom surface is performed in a fully automated manner via the measurement data extraction during post processing.



Report No: KS100602B05-SF FCCID: YHR-RQ101

Date of Issue: June 4, 2010

8. MEASUREMENT UNCERTAINTY

UNCERTAINTY EV	ΔΙ ΙΙΔ	TION	J E	ו פר	10 ИГ	SET	SAR	TES	·T
ONCERTAINTT EV		1101	• • •	JI 1	IAINE	JOLI	OAI		
а	b	С	d	e= f(d,k)	f	g	h= cxf/e	i= cxg/e	k
Uncertainty Component	Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i (1 g)	c _i (10 g)	1 g u _i (± %)	10 g u _i	
Measurement System							(± %)	(± %)	۷i
Probe Calibration	E.2.1.	7	N	1	1	1	7	7	
Axial Isotropy	E.2.2.	2,5	R	√3	$(1-c_p)^{1/2}$	$(1-c_p)^{1/2}$	1 00060	1,02062	
									_
Hemispherical Isotropy	E.2.2.	4	R	√3	√Cp	√C _p	<u> </u>	1,63299	
Boundary Effect	E.2.3.	1	R	√3	1	1		0,57735	
Linearity	E.2.4.	5	R	√3	1	1		2,88675	
System Detection Limits	E.2.5.	1	R	√3	1	1		0,57735	
Readout Electronics	E.2.6.	0,02	N	1	1	1	0,02	0,02	
Response Time	E.2.7.	3	R	√3	1	1	<u> </u>	1,73205	
Integration Time	E.2.8.	2	R	√3	1	1	1,1547	1,1547	
RF Ambient Conditions	E.6.1.	3	R	√3	1	1	1,/3205	1,73205	-
Probe Positioner Mechanical				<u></u>					
Tolerance	E.6.2.	2	R	√3	1	1	1,1547	1,1547	
Probe Positioning with respect to				<u></u>					
Phantom Shell	E.6.3.	0,05	R	√3	1	1	0,02887	0,02887	
Extrapolation, interpolation and									
Integration Algorithms for Max. SAR		_							
Evaluation	E.5.2.	5	R	√3	1	1	2,886/5	2,88675	·
Test sample Related		2.00							
Test Sample Positioning	E.4.2.1.	0,03	N	1	1	1	0,03	0,03	
Device Holder Uncertainty	E.4.1.1.	5	N	1	1	1	5	5	N-1
Output Power Variation - SAR drift				<u></u>					
measurement	6.6.2.	3	R	√3	1	1	1,73205	1,73205	<u></u>
Phantom and Tissue Parameters	1		г	г	Г	Г	Г	Г	
Phantom Uncertainty (shape and					,				
thickness tolerances)	E.3.1.	0,05	R	√3	1	1	0,02887	0,02887	
Liquid Conductivity - deviation from		_					4 0 4750		
target values	E.3.2.	5	R	√3	0,64	0,43	1,84752	1,2413	
Liquid Conductivity - measurement		_		,		0.40		0.45	l.,
uncertainty	E.3.3.	5	N	1	0,64	0,43	3,2	2,15	IM
Liquid Permittivity - deviation from						0.40	4 00000	0.0407	
target values	E.3.2.	3	R	√3	0,6	0,49	1,03923	0,8487	-
Liquid Permittivity - measurement			<u>,</u>	,	۱		_	١.,	l
uncertainty	E.3.3.	10	N	1	0,6	0,49	6	4,9	IM
Combined Standard Uncertainty			RSS				 11,1265	 10,5799	
Expanded Uncertainty			.,				,.200	.0,0,00	
(95% CONFIDENCE INTERVAL)			k=2				21 8079	20,7366	
To Som Dense miletone	1	l	2		I	l	1 = 1,0010	1 20 1. 000	



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

9. EXPOSURE LIMIT

(A). Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

(B). Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles				
0.08	1.6	4.0				

Note: Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 1 grams of tissue defined as a tissue volume in the shape of a cube.

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

<u>Occupational/Controlled Environments</u> 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).

NOTE GENERAL POPULATION/UNCONTROLLED EXPOSURE PARTIAL BODY LIMIT 1.6 W/kg



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

10. EUT ARRANGEMENT

Please refer to IEEE P1528 illustration below.

10.1 ANTHROPOMORPHIC HEAD PHANTOM

Figure 7-1a shows the front, back and side views of SAM. The point "M" is the reference point for the center of mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERPs are 15 mm posterior to the entrance to ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 7-1b. The plane passing through the two ear reference points and M is defined as the Reference Plane. The line N-F (Neck-Front) perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 7-1c). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines should be marked on the external phantom shell to facilitate handset positioning. Posterior to the N-F line, the thickness of the phantom shell with the shape of an ear is a flat surface 6 mm thick at the ERPs. Anterior to the N-F line, the ear is truncated as illustrated in Figure 7-1b. The ear truncation is introduced to avoid the handset from touching the ear lobe, which can cause unstable handset positioning at the cheek.

Figure 7-1a
Front, back and side view of SAM (model for the phantom shell)



Figure 7-1b
Close up side view of phantom showing the ear region

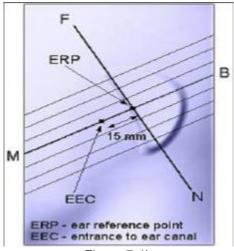


Figure 7-1b
Close up side view of phantom showing the ear region

Figure 7-1c
Side view of the phantom showing relevant markings and the 7
cross sectional plane locations

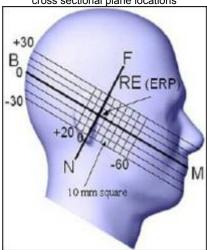


Figure 7-1c
Side view of the phantom showing relevant markings and the 7
cross sectional plane locations

10.2 DEFINITION OF THE "CHEEK/TOUCH" POSITION

The "cheek" or "touch" position is defined as follows:

- a. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece, open the cover. (If the handset can also be used with the cover closed both configurations must be tested.)
- b. Define two imaginary lines on the handset: the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width wt of the handset at the level of the acoustic output (point A on Figures 7-2a and 7-2b), and the midpoint of the width wb of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Figure 7-2a). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output. However, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see Figure 7-2b), especially for clamshell handsets, handsets with flip pieces, and other irregularly-shaped handsets.
- c. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 7-2c), such that the plane defined by the vertical center line and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.
- d. Translate the handset towards the phantom along the line passing through RE and LE until the handset touches the pinna.
- e. e) While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane).
- f. Rotate the handset around the vertical centerline until the handset (horizontal line) is symmetrical with respect to the line NF.
- g. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE and maintaining the handset contact with the pinna, rotate the handset about the line NF until any point on the handset is in contact with a phantom point below the pinna (cheek). See Figure 7-2c. The physical angles of rotation should be noted.

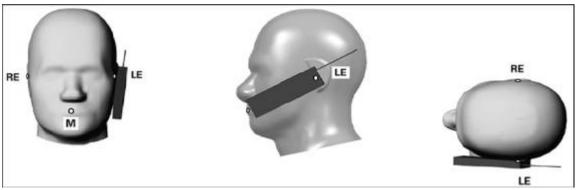


Figure 7.2c

Phone "cheek" or "touch" position. The reference points for the right ear (RE), left ear (LE) and mouth (M), which define the reference plane for handset positioning, are indicated.



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

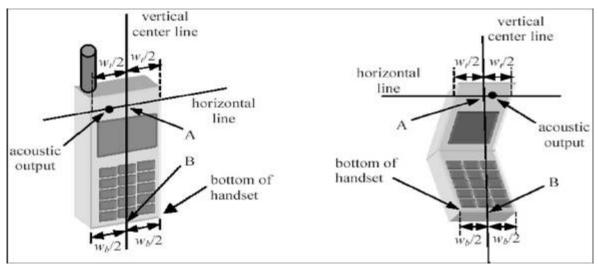


Figure 7.2a Figure 7.2b

10.3 DEFINITION OF THE "TILTED" POSITION

The "tilted" position is defined as follows:

- a. Repeat steps (a) (g) of 7.2 to place the device in the "cheek position."
- b. While maintaining the orientation of the handset move the handset away from the pinna along the line passing through RE and LE in order to enable a rotation of the handset by 15 degrees.
- c. Rotate the handset around the horizontal line by 15 degrees.
- d. While maintaining the orientation of the handset, move the handset towards the phantom on a line passing through RE and LE until any part of the handset touches the ear. The tilted position is obtained when the contact is on the pinna. If the contact is at any location other than the pinna (e.g., the antenna with the back of the phantom head), the angle of the handset should be reduced. In this case, the tilted position is obtained if any part of the handset is in contact with the pinna as well as a second part of the handset is contact with the phantom (e.g., the antenna with the back of the head).

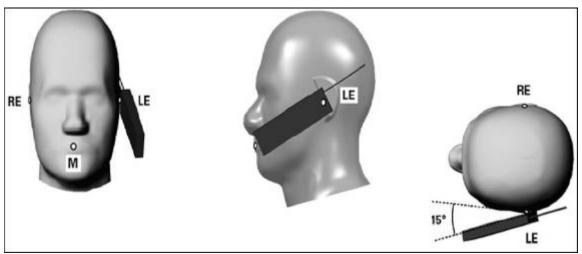


Figure 7-3
Phone "tilted" position. The reference points for the right ear (RE), left ear (LE) and mouth (M), which define the reference plane for handset positioning, are indicated.

Report No: KS100602B05-SF FCCID: YHR-RQ101

Date of Issue: June 4, 2010

MEASUREMENT RESULTS 11.

TEST LIQUIDS CONFIRMATION 11.1

SIMULATED TISSUE LIQUID PARAMETER CONFIRMATION

The dielectric parameters were checked prior to assessment using the HP85070C dielectric probe kit. The dielectric parameters measured are reported in each correspondent section.

IEEE SCC-34/SC-2 P1528 RECOMMENDED TISSUE DIELECTRIC PARAMETERS

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 and

extrapolated according to the head parameters specified in P1528

Target Frequency	He	ad	Body		
(MHz)	ε _r	σ (S/m)	ε _r	σ (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	45.3	5.27	48.2	6.00	

(ε_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

LIQUID MEASUREMENT RESULTS

Ambient condition: Temperature: 21 °C Relative humidity: <u>58</u>%

Liquid Type	Frequency	Temp. [°C]	Depth [cm]	Parameters	Target	Measured	Deviation[%]	Limited[%]	Measured Date
Head850	835 MHz	20	15	Permitivity	41.5	41.657	-0.38	± 5	June 4,2010
	000 1011 12	20	15	Conductivity	0.9	0.921	2.33	± 5	June 4,2010
Body850	835 MHz	20	15	Permitivity	55.2	56.451	-2.27	± 5	June 4,2010
		20	15	Conductivity	0.97	0.982	-1.24	± 5	June 4,2010
Head1900	1950 MHz	20	15	Permitivity	40	40.325	-0.81	± 5	June 4,2010
Ticau 1900	1950 WII IZ	20	15	Conductivity	1.4	1.426	-1.86	± 5	June 4,2010
Body1900	1950 MHz	20	15	Permitivity	53.3	52.028	2.39	± 5	June 4,2010
Dody 1900	1000 1011 12	20	15	Conductivity	1.52	1.487	2.17	± 5	June 4,2010

Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

11.2 SYSTEM PERFORMANCE CHECK

The system performance check is performed prior to any usage of the system in order to guarantee reproducible results. The system performance check verifies that the system operates within its specifications of $\pm 10\%$. The system performance check results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

SYSTEM PERFORMANCE CHECK MEASUREMENT CONDITIONS

- The measurements were performed in the flat section of the SAM twin phantom filled with head and body simulating liquid of the following parameters.
- The OPENSAR system with an E-field probe EP 100 SN:1109 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 15 mm (below 1 GHz) and 10 mm (above 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 10mm was aligned with the dipole.
- Special 7x7x7 fine cube was chosen for cube integration (dx= 5 mm, dy= 5 mm, dz= 5 mm).
- Distance between probe sensors and phantom surface was set to 2.5 mm.
- The dipole input power was 1W±3%.
- The results are normalized to 1 W input power.

Reference SAR values

The reference SAR values were using measurement results indicated in the dipole calibration document (see table below)

Frequency (MHz)	1g SAR	10g SAR	Local SAR at Surface (Above Feed Point)	Local SAR at Surface (y = 2cm offset from feed point)
835 Head	9.41	6.27	14.1	4.9
835 Body	9.79	6.63	14.1	4.9
1900 Head	41.35	21.39	67.6	6.6
1900 Body	38.95	20.51	01.0	0.0



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

SYSTEM PERFORMANCE CHECK RESULTS

Ambient conduction

Temperature: 21 °C Relative humidity: 58%

System Validation Dipole: <u>DIPOLE850 SN:SN 48/05 DIPC32</u> Date: June 4,2010

	Mediur	n				Deviation	Limit
Туре	Temp (°C)	Depth (± 0.5 cm)	Parameter	Target	Measured	(%)	(%)
Head	20.00	20.00 15.00	Permitivity	41.50	41.657	0.38	± 5
835 MHz			Conductivity	0.90	0.921	2.33	± 5
033 IVITZ			1g SAR	9.41	9.574	1.74	± 10

Temperature: 21 °C Relative humidity: 58%

System Validation Dipole: <u>DIPOLE850SN:SN 48/05 DIPC32</u> Date: June 4,2010

	Mediur	n				Deviation	Limit
Туре	Temp (°C)	Depth (± 0.5 cm)	Parameter	Target	Measured	(%)	(%)
Body	20.00	20.00 15.00	Permitivity	55.20	56.451	2.27	± 5
835 MHz			Conductivity	0.97	0.982	1.24	± 5
835 MHZ			1g SAR	9.79	9.656	-1.37	± 10

Temperature: 21 °C Relative humidity: 58%

System Validation Dipole: <u>DIPOLE1900 SN:SN 48/05 DIPI36</u> Date: June 4,2010

	Mediur	n				Deviation	Limit (%)
Туре	Temp (°C)	Depth (± 0.5 cm)	Parameter	Target	Measured	(%)	
Head		Permittivity	40.00	40.325	0.81	± 5	
1900 MHz	20.00	20.00 15.00	Conductivity	1.40	1.426	1.86	± 5
1000 11112			1g SAR	41.35	40.147	-2.91	± 10

Temperature: 21 °C Relative humidity: 58%

System Validation Dipole: <u>DIPOLE1900 SN: SN 48/05 DIPI36</u> Date: June 4,2010

	Mediun	n				Deviation	Limit
Туре	Temp (°C)	Depth (± 0.5 cm)		rarget	Measured	(%)	(%)
Dody		Permittivity	53.30	52.028	-2.39	± 5	
Body 1900 MHz	20.00	15.00	Conductivity	1.52	1.487	-2.17	± 5
1300 1011 12			1g SAR	38.95	38.574	-0.97	± 10

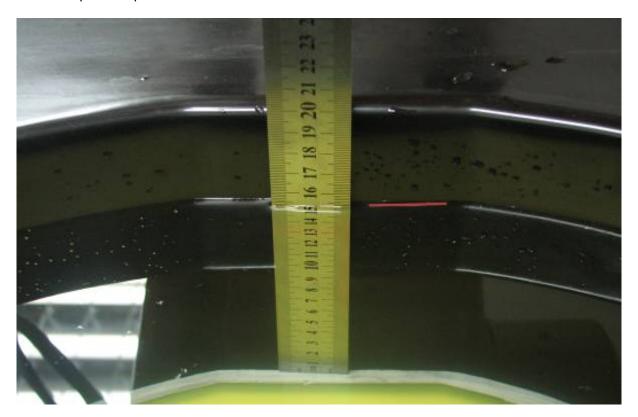


Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

11.3 EUT TUNE-UP PROCEDURES AND TEST MODE

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

- The client supplied a special driver to program the EUT, allowing it to continually transmit the specified maximum power and change the channel frequency.
- The conducted power was measured at the high, middle and low channel frequency before and after the SAR measurement.
- o During SAR test, the highest output channel per band measured first.
- o the depth of Liquid must above 15cm.



11.4 RF POWER OUTPUT

The respectively maximum output powers of each RF modes are as below:

Conducted output power (Average)(dBm)

C	SM		mode	GPRS	mode
	O IVI	before	after	before	after
	Ch 128	32.87	32.86	32.84	32.83
GSM850	Ch 190	32.65	32.64	32.62	32.61
	Ch 251	32.22	32.21	32.20	32.19
C	SM	GSM	mode	GPRS	mode
0.0	DIVI	before	after	before	after
	Ch 512	29.77	29.76	29.74	29.73
GSM1900	Ch 661	29.51	29.50	29.48	29.47
	Ch 810	28.94	28.93	28.91	28.90

Bluetooth output power (Average)(dBm)

3.0.000 0 0.0 p 0.0 p 0.0 (1.0.0 0.90)(0.2 m)												
Mode	DATA	A1 1M	DATA	3 3M								
Frequency	before test	after test	before test	after test								
2402 MHz	-0.66	N/A	-2.25	N/A								
2441 MHz	-0.26	SAR measurement is	-1.71	SAR measurement is								
2480 MHz	0.08	not required	-2.80	not required								

Ps. (1)0.8dBm=1.20mW is less than 24.58mW(60/f), so Bluetooth stand-alone SAR is not required.

Notice1: According to KDB 648474, For Bluetooth module transmitter that does not transmit simultaneously with other transmitters and its output is $\leq 60/f(GHz)$ mW(0.8dBm=1.22mW is less than 24.58mW(60/f)), 1-g SAR evaluation is not required.

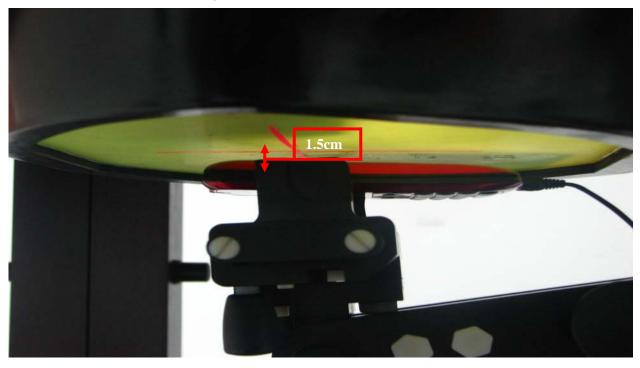


Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

11.5 EUT SETUP PHOTOS

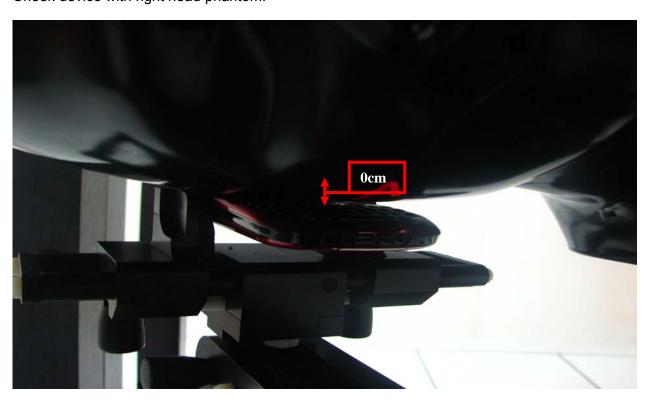
EUT Setup Configuration 1

the back side of the EUT in body position with GSM



EUT Setup Configuration 2

Cheek device with right head phantom.

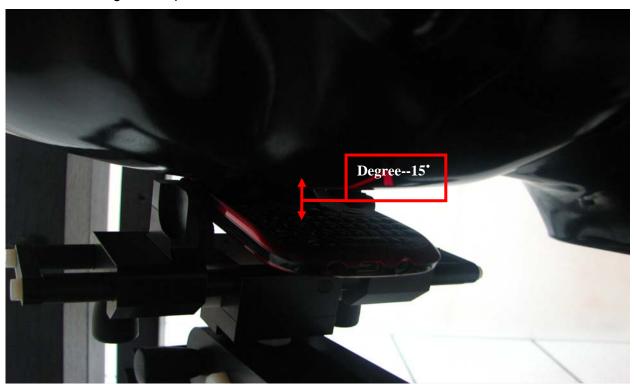




Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

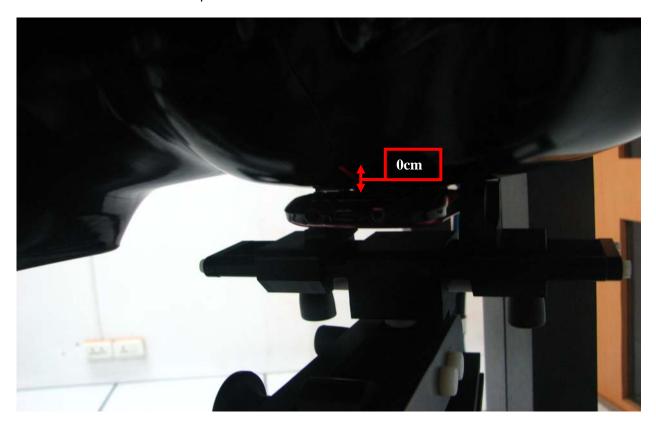
EUT Setup Configuration 3

Tilt device with right head phantom.



EUT Setup Configuration 4

Cheek device with left head phantom.

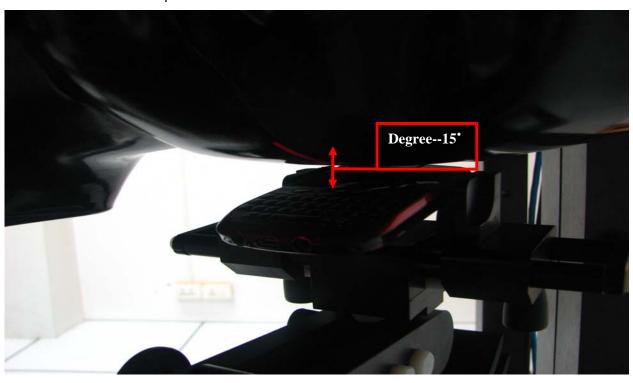




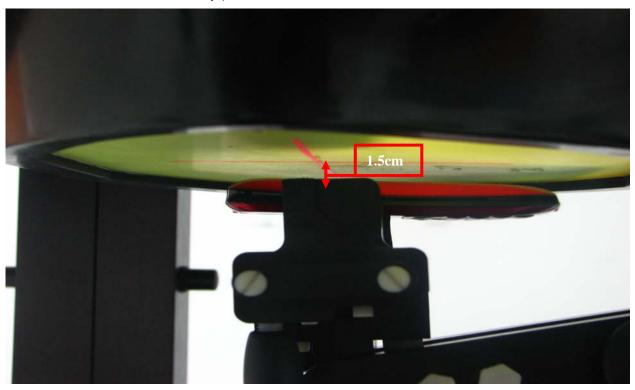
Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

EUT Setup Configuration 5

Tilt device with left head phantom.



<u>EUT Setup Configuration 6</u> the back side of the EUT in body position with GPRS





Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

11.6 SAR MEASUREMENT RESULTS

Date of Measurement: June 4,2010

SAR Measurement GSM 850

Crest Factor: 8 (Duty cycle: 12.5%) Depth of Liquid: 15.0 cm

EUT Configuration 1

EUT Setup Condition		Freque	ency	Conducted Power (dBm)		Liquid Temp	SAR(1g)	Limit
Position	Antenna	Channel	MHz	Before	After	[°C]	(W/kg)	(W/kg)
		128	824.2	32.87	32.86	20.0	0.29	
Flat (1.5cm)	Fixed	180	836.6	32.65	32.64	20.0	0.21	1.6
(1.00111)		251	848.8	32.22	32.21	20.0	0.39	

EUT Configuration 2&4

EUT Setup Condition		•	Frequency			Conducted Power (dBm)		SAR(1g)	Limit
Positio	n	Antenna	Channel	MHz	Before	After	Temp [°C]	(W/kg)	(W/kg)
	ad		128	824.2	32.87	32.86	20.0	0.85	
	Righthead	Fixed	180	836.6	32.65	32.64	20.0	0.83	
cheek	Rig		251	848.8	32.22	32.21	20.0	0.80	1.6
OHECK	ad		128	824.2	32.87	32.86	20.0	0.87	1.0
	ft_head	Fixed	180	836.6	32.65	32.64	20.0	0.84	
	Left		251	848.8	32.22	32.21	20.0	0.81	

EUT Configuration 3&5

		_							1
	EUT Setup Condition		Freque	requency		Conducted Power (dBm)		SAR(1g)	Limit
Posit	tion	Antenna	Channel	MHz	Before	After	Temp [°C]	(W/kg)	(W/kg)
	ad		128	824.2	32.87	32.86	20.0	0.63	
	Righthead	Fixed	180	836.6	32.65	32.64	20.0	0.67	
tilt	Rig		251	848.8	32.22	32.21	20.0	0.69	1.6
	head		128	824.2	32.87	32.86	20.0	0.41	1.0
	1 1	Fixed	180	836.6	32.65	32.64	20.0	0.49	
	Left		251	848.8	32.22	32.21	20.0	0.51	

Remarks: For SAR testing, EUT is in GSM link mode. In GSM850 link mode, its crest factor is 8. (Duty cycle: 1:8)



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

Date of Measurement: June 4,2010

SAR Measurement GPRS 850 Class 10

<u>Crest Factor: 4 (Duty cycle: 25%)</u> Depth of Liquid: <u>15.0</u> cm

EUT Configuration 6

EUT Setup Condition		Frequ	ency	Conducted Power (dBm)		Liquid Temp	SAR(1g) (W/kg)	Limit
Position	Antenna	Channel	MHz	Before	After	[°C]	(vv/kg)	(W/kg)
		128	824.2	32.84	32.83	20.0	0.26	
Flat (1.5cm)	Fixed	180	836.6	32.62	32.61	20.0	0.34	1.6
(1.00)		251	848.8	32.20	32.19	20.0	0.38	

Remarks: For SAR testing, EUT is in GPRS link mode. In GPRS850 link mode, its crest factor is 4. (Duty cycle: 1:4)



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

Date of Measurement: June 4,2010

SAR Measurement GSM 1900

Crest Factor: 8 (Duty cycle: 12.5%) Depth of Liquid: 15.0 cm

EUT Configuration 1

EUT Setup Condition		Frequ	ency	Conducted Power (dBm)		Liquid Temp	SAR(1g) (W/kg)	Limit
Position	Antenna	Channel	MHz	Before	After	[°C]	(vv/kg)	(W/kg)
		512	1850.2	29.77	29.76	20.0	0.37	
Flat (1.5cm)	Fixed	661	1880.0	29.51	29.50	20.0	0.30	1.6
(1.0011)		810	1910.0	28.94	28.93	20.0	0.32	

EUT Configuration 2&4

EUT Setup Condition		-	Frequ	quency Conducted Pow (dBm)			Liquid Temp	SAR(1g)	Limit
Positi	on	Antenna	Channel	MHz	Before	After	[°C]	(W/kg)	(W/kg)
	ad		512	1850.2	29.77	29.76	20.0	0.46	
	Righthead	Fixed	661	1880.0	29.51	29.50	20.0	0.51	
cheek	Rig		810	1910.0	28.94	28.93	20.0	0.55	1.6
OHOOK	ad		512	1850.2	29.77	29.76	20.0	0.31	1.0
	Left_head	Fixed	661	1880.0	29.51	29.50	20.0	0.44	
			810	1910.0	28.94	28.93	20.0	0.46	

EUT Configuration 3&5

	EUT Setup Condition		Frequ	THENCY		ed Power 3m)	Liquid Temp	SAR(1g) (W/kg)	Limit (W/kg)
Posit	ion	Antenna	Channel	MHz	Before	After	[°C]	(VV/K(1)	
	ad		512	1850.2	29.77	29.76	20.0	0.41	
	Righthead	Fixed	661	1880.0	29.51	29.50	20.0	0.46	
tilt	Rig		810	1910.0	28.94	28.93	20.0	0.53	1.6
· · · ·	þ		512	1850.2	29.77	29.76	20.0	0.34	1.0
	t_head	Fixed	661	1880.0	29.51	29.50	20.0	0.41	
	Left		810	1910.0	28.94	28.93	20.0	0.44	

Remarks: For SAR testing, EUT is in GSM link mode. In GSM1900 link mode, its crest factor is 8. (Duty cycle: 1:8)



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

Date of Measurement: June 4,2010

SAR Measurement GPRS 1900 Class 10

Crest Factor: 4 (Duty cycle: 25%)

Depth of Liquid: 15.0 cm

EUT Configuration 6

EUT Setup Condition		Frequ	ency	Conducted Power (dBm)		Liquid Temp	SAR(1g)	Limit
Position	Antenna	Channel	MHz	Before	After	[°C]	(W/kg)	(W/kg)
		512	1850.2	29.74	29.73	20.0	0.46	
Flat (1.5cm)	Fixed	661	1880.0	29.48	29.47	20.0	0.38	1.6
(1.5011)		810	1910.0	28.91	28.90	20.0	0.47	

Remarks: For SAR testing, EUT is in GPRS link mode. In GPRS 1900 link mode, its crest factor is 4. (Duty cycle: 1:4)



Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

EUT PHOTO









































Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

12. EQUIPMENT LIST & CALIBRATION STATUS

Name of Equipment	Manufacturer	Type/Model	Serial Number	Calibration Due
P C	HP	PV 3.06GHz	375052-AA1	N/A
Signal Generator	Agilent	E8257C	MY43321570	12/11/2010
MultiMeter	Keithley	2000	1015843	05/01/2011
S-Parameter Network Analyzer	Agilent	E5071B	MY42301382	08/07/2010
Wireless Communication Test Set	R&S	CMU200	SN:B23-03291	06/17/2010
Power Meter	Agilent	E4416A	QB41292714	07/29/2010
E-field PROBE	ANTENNESSA	EP_100	SN1109	04/16/2011
DIPOLE 835	ANTENNESSA	DIPC32	SN 48/05	12/10/2010
DIPOLE 900	ANTENNESSA	DIPD33	SN 48/05	12/10/2010
DIPOLE 1800	ANTENNESSA	DIPF34	SN 48/05	12/10/2010
DIPOLE 1900	ANTENNESSA	DIPI36	SN 48/05	12/10/2010
DIPOLE 2450	ANTENNESSA	DIPJ37	SN 48/05	12/10/2010
POSITIONING DEVICE	ANTENNESSA	MSH_14	SN 41_05	N/A
DUMMY PROBE	ANTENNESSA	DP_12	SN 39_05	N/A
SAM PHANTOM	ANTENNESSA	SAM29	SN 41_05	N/A
PHANTON WOOD TABLE	ANTENNESSA	N/A	N/A	N/A
6 AXIS ROBOT	KUKA	KR3	846428	N/A
ROBOT KRC	KUKA	KCP2	01436	N/A
CHANELS SCAN CARD	KEITHLEY	2000	2000-172-01B	N/A
PROBE/ROBOT POSITIONING DEVICE	ANTENNESSA	MSH14	SN 41_05	N/A
LIQUID CALIBRATION KIT	ANTENNESSA	41/05 OCP9	00425167	N/A

Page 38 of 40

Rev. 00

Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

13. FACILITIES

All measurement facilities used to collect the measurement data are located at

No.10, Weiye Rd., Innovation Park, Eco & Tec. Development Part, Kunshan City, Jiangsu Province, China.

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Report No: KS100602B05-SF FCCID: YHR-RQ101 Date of Issue: June 4, 2010

15. ATTACHMENTS

Exhibit	Content
1	System Validation Plots
2	SAR Test Plots
3	Dipole calibration report (850MHz/1900MHz)
4	E-field calibration report

END OF REPORT