



SAR EVALUATION REPORT

For

ITALCOM GROUP

1728 Coral Way, Coral Gables, Miami, Florida, 33145, United States

FCC ID: YPVITALCOMLOV-TV

Report Type: Original Report	Product Type: Mobile Phone
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Report Number: <u>RSZ120925002-20</u>	
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* This report may contain data that are not covered by the NVLAP accreditation and shall be marked with an asterisk ★

Attestation of Test Results					
EUT Information	Company Name	ITALCOM GROUP			
	EUT Description	Mobile Phone			
	FCC ID	YPVITALCOMLOV-TV			
	Model Number	lov-tv			
	Test Date	2012-10-15 to 2012-10-16			
Frequency	Max. SAR Level(s) Measured	Limit(W/Kg)			
Cellular Band	0.617 W/kg 1g Head SAR 0.784 W/kg 1g Body SAR	1.6			
PCS Band	0.378 W/kg 1g Head SAR 0.489 W/kg 1g Body SAR				
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 SuchFields,100 kHz—300 GHz.				
	OET BULLETIN 65 SUPPLEMENT C Evaluating Compliance with FCC Guidelines for Human Exposure To Radiofrequency Electromagnetic Fields				
	IEEE1528:2003 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques				
Note: This wireless device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled Exposure limits specified in ANSI/IEEE Standards and has been tested in accordance with the measurement procedures specified in FCC OET 65 Supplement C and IEEE 1528-2003.					
The results and statements contained in this report pertain only to the device(s) evaluated.					

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	RSZ120925002-20	Original Report	2012-11-26

EUT DESCRIPTION

This report has been prepared on behalf of ITALCOM GROUP and their product, FCC ID: YPVITALCOMLOV-TV Model: lov-tv or the EUT (Equipment under Test) as referred to in the rest of this report. The EUT is a Mobile phone.

Technical Specification

Product Type	Portable
Exposure Category:	Population / Uncontrolled
Antenna Type(s):	Internal Antenna
Body-Worn Accessories:	Headset
Face-Head Accessories:	None
Multi-slot Class:	Class 12
Operation Mode :	GSM Voice, GPRS Data and Bluetooth
Frequency Band:	Cellular Band : 824-849 MHz(TX) ; 869-894 MHz(RX) PCS Band : 1850-1910 MHz(TX) ; 1930-1990 MHz(RX) Bluetooth : 2402-2480 MHz
Conducted RF Power:	Cellular Band : 32.85 dBm PCS Band : 29.61 dBm Bluetooth : 7.31 dBm
Dimensions (L*W*H):	90.0 mm (L)× 51.0mm (W)× 14.0 mm (H)
Weight:	67.7g
Power Source:	3.7VDCRechargeable Battery
Normal Operation:	Head and Body-worn

REFERENCE, STANDARDS, AND GUILDEINES

FCC:

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

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

CE:

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

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

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

SAR Limits

FCC Limit (1g Tissue)

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

CE Limit (10g Tissue)

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

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

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

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

FACILITIES AND ACCREDITATION

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

Additionally, Bay Area Compliance Laboratories Corp. (Shenzhen) is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (Lab Code 200707-0).



The current scope of accreditations can be found at <http://ts.nist.gov/Standards/scopes/2007070.htm>

DESCRIPTION OF TEST SYSTEM

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

ALSAS-10U System Description

ALSAS-10-U is fully compliant with the technical and scientific requirements of IEEE 1528, IEC 62209, CENELEC, ARIB, ACA, and the Federal Communications Commission. The system comprises of a six axes articulated robot which utilizes a dedicated controller.

ALSAS-10U uses the latest methodologies. And FDTD modeling to provide a platform which is repeatable with minimum uncertainty.

Applications

Predefined measurement procedures compliant with the guidelines of CENELEC, IEEE, IEC, FCC, etc are utilized during the assessment for the device. Automatic detection for all SAR maxima are embedded within the core architecture for the system, ensuring that peak locations used for centering the zoom scan are within a 1mm resolution and a 0.05mm repeatable position. System operation range currently available up-to 6 GHz in simulated tissue.

Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

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

Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the ALSAS-10U software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10mm, with the side length of the 10 g cube 21.5mm.

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

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



ALSAS-10U Interpolation and Extrapolation Uncertainty

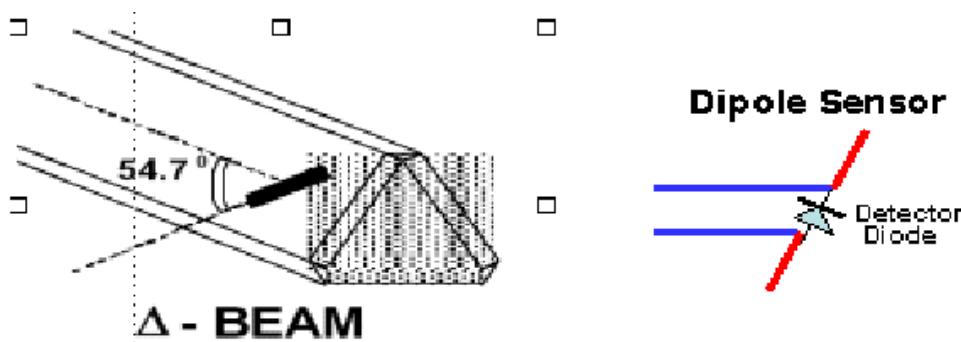
The overall uncertainty for the methodology and algorithms used during the SAR calculation was evaluated using the data from IEEE 1528 based on the example f3 algorithm:

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

Isotropic E-Field Probe

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

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



SAR is assessed with a calibrated probe which moves at a default height of 5mm from the center of the diode, which is mounted to the sensor, to the phantom surface (in the Z Axis). The 5mm offset height has been selected so as to minimize any resultant boundary effect due to the probe being in close proximity to the phantom surface.

The following algorithm is an example of the function used by the system for linearization of the output from the probe when measuring complex modulation schemes.

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

Isotropic E-Field Probe Specification

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

Boundary Detection Unit and Probe Mounting Device

ALSAS-10U incorporates a boundary detection unit with a sensitivity of 0.05mm for detecting all types of surfaces. The robust design allows for detection during probe tilt (probe normalize) exercises, and utilizes a second stage emergency stop. The signal electronics are fed directly into the robot controller for high accuracy surface detection in lateral and axial detection modes (X, Y, & Z).

The probe is mounted directly onto the Boundary Detection unit for accurate tooling and displacement calculations controlled by the robot kinematics. The probe is connect to an isolated probe interconnect where the output stage of the probe is fed directly into the amplifier stage of the Daq-Paq.

Daq-Paq (Analog to Digital Electronics)

ALSAS-10U incorporates a fully calibrated Daq-Paq (analog to digital conversion system) which has a 4 channel input stage, sent via a 2 stage auto-set amplifier module. The input signal is amplified accordingly so as to offer a dynamic range from 5 μV to 800mV. Integration of the fields measured is carried out at board level utilizing a Co-Processor which then sends the measured fields down into the main computational module in digitized form via an RS232 communications port. Probe linearity and duty cycle compensation is carried out within the main Daq-Paq module.

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

Axis Articulated Robot

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



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

ALSAS Universal Workstation

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

Universal Device Positioner

The universal device positioner allows complete freedom of movement of the EUT. Developed to hold a EUT in a free-space scenario any additional loading attributable to the material used in the construction of the positioner has been eliminated. Repeatability has been enhanced through the linear scales which form the design used to indicate positioning for any given test scenario in all major axes. A 15° tilt indicator is included for the aid cheek to tilt movements for head SAR analysis. Overall uncertainty for measurements have been reduced due to the design of the Universal device positioner, which allows positioning of a device in as near to a free-space scenario as possible, and by providing the means for complete repeatability.

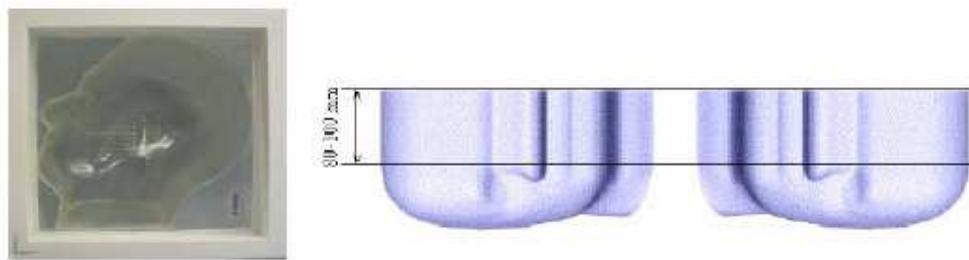


Phantom Types

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

APREL SAM Phantoms

The SAM phantoms developed using the IEEE SAM CAD file. They are fully compliant with the requirements for both IEEE 1528 and FCC Supplement C. Both the left and right SAM phantoms are interchangeable, transparent and include the IEEE 1528 grid with visible NF and MB lines.



APREL Laboratories Universal Phantom

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

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

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



Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

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

Recommended Tissue Dielectric Parameters for Head and Body

Frequency (MHz)	Head Tissue		Body Tissue	
	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	35.3	5.27	48.2	6.00

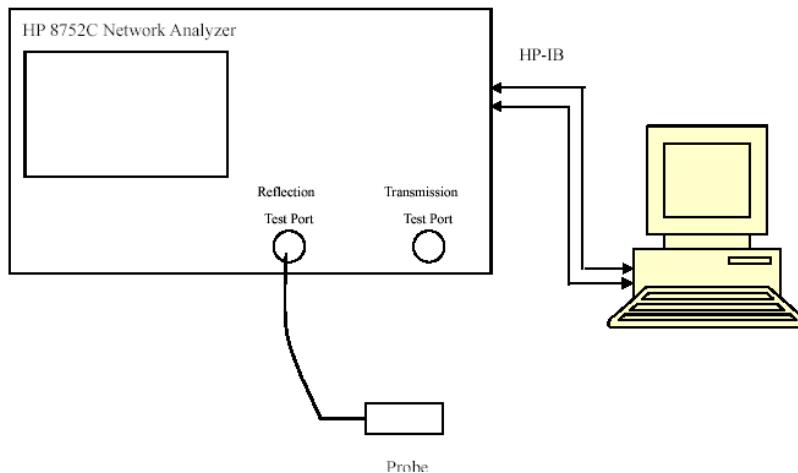
EQUIPMENT LIST AND CALIBRATION

Equipments List & Calibration Information

Equipment	Model	Calibration Date	S/N
CRS F3 robot	ALS-F3	N/A	RAF0805352
CRS F3 Software	ALS-F3-SW	N/A	N/A
CRS C500C controller	ALS-C500	N/A	RCF0805379
Probe mounting device & Boundary Detection Sensor System	ALS-PMDPS-3	N/A	120-00270
Universal Work Station	ALS-UWS	N/A	100-00157
Data Acquisition Package	ALS-DAQ-PAQ-3	2012-05-13	110-00212
Miniature E-Field Probe	ALS-E-020	2012-08-09	500-00283
Dipole, 835MHz	ALS-D-835-S-2	2011-08-25	180-00558
Dipole, 1900MHz	ALS-D-1900-S-2	2011-08-25	210-00710
Dipole Spacer	ALS-DS-U	N/A	250-00907
Device holder/Positioner	ALS-H-E-SET-2	N/A	170-00510
Left ear SAM phantom	ALS-P-SAM-L	N/A	130-00311
Right ear SAM phantom	ALS-P-SAM-R	N/A	140-00359
UniPhantom	ALS-P-UP-1	N/A	150-00413
Simulated Tissue 835 MHz Head	ALS-TS-835-H	Each Time	270-01002
Simulated Tissue 835 MHz Body	ALS-TS-835-B	Each Time	270-02101
Simulated Tissue 1900 MHz Head	ALS-TS-1900-H	Each Time	295-01103
Simulated Tissue 1900 MHz Body	ALS-TS-1900-B	Each Time	295-02102
Power Amplifier	5S1G4	N/A	71377
Synthesized Sweeper	HP 8341B	2012-05-17	2624A00116
UNIVERSAL RADIO COMMUNICATION TESTER	CMU 200	2011.12.16	1100.0008.02
EMI Test Receiver	ESCI	2011-11-17	101122

SAR MEASUREMENT SYSTEM VERIFICATION

Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta \epsilon_r$	$\Delta \sigma$	
824.2	Head	41.21	0.88	41.50	0.90	-0.699	-2.222	± 5
	Body	55.19	0.95	55.20	0.97	-0.018	-2.062	± 5
836.6	Head	41.17	0.90	41.50	0.90	-0.795	0.000	± 5
	Body	55.26	0.97	55.20	0.97	0.109	0.000	± 5
848.8	Head	40.94	0.91	41.50	0.90	-1.349	1.111	± 5
	Body	55.34	0.99	55.20	0.97	0.254	2.062	± 5
1850.2	Head	40.73	1.36	40.00	1.40	1.825	-2.857	± 5
	Body	53.58	1.51	53.30	1.52	0.525	-0.658	± 5
1880.0	Head	40.74	1.38	40.00	1.40	1.850	-1.429	± 5
	Body	53.33	1.55	53.30	1.52	0.056	1.974	± 5
1909.8	Head	40.75	1.44	40.00	1.40	1.875	2.857	± 5
	Body	53.40	1.56	53.30	1.52	0.188	2.632	± 5

*Liquid Verification was performed on 2012-10-15

Please refer to the following tables.

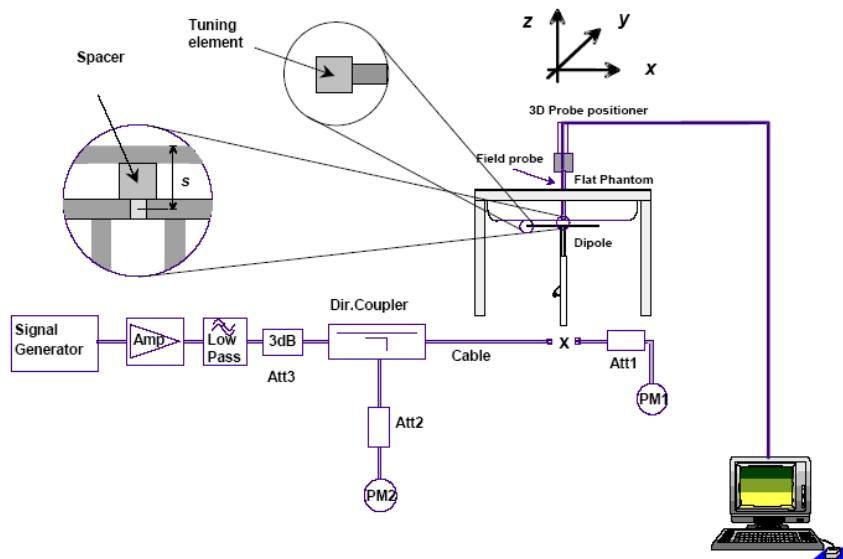
850 MHz Head			850 MHz Body		
Frequency (MHz)	e'	e''	Frequency (MHz)	e'	e''
824.0	41.210092	19.306973	824.0	55.186563	20.791042
824.5	41.179063	19.307527	824.5	55.189701	20.690553
825.0	41.162403	19.308081	825.0	55.192834	20.703071
825.5	41.057263	19.308635	825.5	55.195977	20.715505
826.0	41.075621	19.309191	826.0	55.199115	20.850567
826.5	41.097514	19.309743	826.5	55.202253	20.914298
827.0	41.074001	19.310297	827.0	55.205391	20.828797
827.5	41.121322	19.310851	827.5	55.208529	20.706933
828.0	41.140928	19.311405	828.0	55.211667	20.741495
828.5	41.147354	19.311961	828.5	55.214805	20.698918
829.0	41.198285	19.312513	829.0	55.217943	20.803073
829.5	41.146778	19.313068	829.5	55.221081	20.745902
830.0	41.183146	19.313622	830.0	55.224219	20.623799
830.5	41.143175	19.314176	830.5	55.227357	20.688187
831.0	41.116173	19.314732	831.0	55.230495	20.673362
831.5	41.135728	19.315284	831.5	55.233633	20.880786
832.0	41.097546	19.315838	832.0	55.236771	20.858451
832.5	41.072372	19.316392	832.5	55.239909	20.635149
833.0	41.112906	19.316946	833.0	55.243047	20.568513
833.5	41.144325	19.317512	833.5	55.246185	20.679980
834.0	41.141750	19.318054	834.0	55.249322	20.831837
834.5	41.140335	19.318611	834.5	55.252462	20.724799
835.0	41.165159	19.319163	835.0	55.255598	20.668258
835.5	41.166159	19.320018	835.5	55.258736	20.915965
836.0	41.169759	19.320873	836.0	55.261874	20.922888
836.5	41.154791	19.321728	836.5	55.265012	20.780695
837.0	41.141588	19.322584	837.0	55.268151	20.607778
837.5	41.135795	19.323442	837.5	55.271288	20.644044
838.0	41.158968	19.324294	838.0	55.274426	20.928327
838.5	41.117498	19.325151	838.5	55.277564	20.943531
839.0	41.107429	19.326005	839.0	55.280702	20.865543
839.5	41.109899	19.326861	839.5	55.283842	20.800501
840.0	41.120966	19.327715	840.0	55.286978	20.867644
840.5	41.110328	19.328572	840.5	55.290116	20.913008
841.0	41.093612	19.329426	841.0	55.293254	20.868136
841.5	41.123042	19.330281	841.5	55.296392	20.804873
842.0	41.124744	19.331136	842.0	55.299534	20.980713
842.5	41.128440	19.331991	842.5	55.302668	20.949226
843.0	41.122535	19.322813	843.0	55.305806	20.909624
843.5	41.046238	19.323664	843.5	55.308944	20.865135
844.0	41.122494	19.324520	844.0	55.312082	20.882793
844.5	41.076781	19.325374	844.5	55.315224	20.908734
845.0	41.002799	19.326233	845.0	55.318358	20.818118
845.5	41.018101	19.327085	845.5	55.321496	20.764504
846.0	40.972684	19.348016	846.0	55.324634	20.937505
846.5	41.013623	19.348871	846.5	55.327772	20.998909
847.0	40.993892	19.349727	847.0	55.330911	20.947768
847.5	40.997076	19.350582	847.5	55.334048	20.868069
848.0	40.970678	19.351437	848.0	55.337186	20.958226
848.5	40.975273	19.352292	848.5	55.340324	21.036311
849.0	40.935541	19.353147	849.0	55.343462	21.036492

1900 MHz Head				1900 MHz Body		
Frequency (MHz)	e'	e''		Frequency (MHz)	e'	e''
1850.0	40.733639	13.191208		1850.0	53.575504	14.653781
1851.2	40.735866	13.161232		1851.2	53.507423	14.611198
1852.4	40.736119	13.128513		1852.4	53.526267	14.612302
1853.6	40.736365	13.151884		1853.6	53.502851	14.588575
1854.8	40.736614	13.145844		1854.8	53.405686	14.608058
1856.0	40.736862	13.069953		1856.0	53.508709	14.644479
1857.2	40.737112	13.209811		1857.2	53.501880	14.670464
1858.4	40.737363	13.106013		1858.4	53.483894	14.591684
1859.6	40.737611	13.159952		1859.6	53.465565	14.586023
1860.8	40.737861	13.161271		1860.8	53.361356	14.638819
1862.0	40.738109	13.177915		1862.0	53.389032	14.466022
1863.2	40.738358	13.197245		1863.2	53.335013	14.478827
1864.4	40.738608	13.235231		1864.4	53.369765	14.495911
1865.6	40.738856	13.229805		1865.6	53.376238	14.466945
1866.8	40.739106	13.218616		1866.8	53.451248	14.457515
1868.0	40.739404	13.237123		1868.0	53.519692	14.473588
1869.2	40.739603	13.297883		1869.2	53.528754	14.496014
1870.4	40.739855	13.290624		1870.4	53.442252	14.547465
1871.6	40.740102	13.264554		1871.6	53.384632	14.548174
1872.8	40.740351	13.294609		1872.8	53.423066	14.577164
1874.0	40.740614	13.237262		1874.0	53.349531	14.585473
1875.2	40.740852	13.271325		1875.2	53.412694	14.648732
1876.4	40.741109	13.269292		1876.4	53.315809	14.571511
1877.6	40.741348	13.333792		1877.6	53.418092	14.651552
1878.8	40.741597	13.229395		1878.8	53.445879	14.783388
1880.0	40.741846	13.174618		1880.0	53.328212	14.802343
1881.2	40.742095	13.223358		1881.2	53.286441	14.799379
1882.4	40.742346	13.245956		1882.4	53.381982	14.770757
1883.6	40.742594	13.214729		1883.6	53.347483	14.726784
1884.8	40.742843	13.215307		1884.8	53.372381	14.749521
1886.0	40.743092	13.214633		1886.0	53.407591	14.681715
1887.2	40.743342	13.289783		1887.2	53.388366	14.657881
1888.4	40.743592	13.308879		1888.4	53.478143	14.692193
1889.6	40.743841	13.367887		1889.6	53.408634	14.696802
1890.8	40.744089	13.486228		1890.8	53.454309	14.753631
1892.0	40.744338	13.494237		1892.0	53.442273	14.549814
1893.2	40.744587	13.512888		1893.2	53.414725	14.510735
1894.4	40.744838	13.522218		1894.4	53.387363	14.559817
1895.6	40.745085	13.484821		1895.6	53.380211	14.893618
1896.8	40.745335	13.494154		1896.8	53.370112	14.891725
1898.0	40.745584	13.601627		1898.0	53.370442	14.872285
1899.2	40.745834	13.667674		1899.2	53.447443	14.872725
1900.4	40.746084	13.578981		1900.4	53.412359	14.771382
1901.6	40.746332	13.551182		1901.6	53.415842	14.860728
1902.8	40.746602	13.521281		1902.8	53.384933	14.820754
1904.0	40.746829	13.536459		1904.0	53.466644	14.789567
1905.2	40.747079	13.519662		1905.2	53.378401	14.758088
1906.4	40.747339	13.515776		1906.4	53.368313	14.683022
1907.6	40.747577	13.492646		1907.6	53.293993	14.799813
1908.8	40.747826	13.511017		1908.8	53.378273	14.735241
1910.0	40.748077	13.529381		1910.0	53.404796	14.698863

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

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
APREL	Probe	ALS-E-020	500-00283	2012-08-09	2013-08-08
APREL	Dipole, 835MHz	ALS-D-835-S-2	180-00558	2011-08-25	2014-08-25
APREL	Dipole, 1900MHz	ALS-D-1900-S-2	210-00710	2011-08-25	2014-08-25

Date	Frequency Band	Liquid Type	Measured SAR (W/Kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2012-10-15	835	Head	1g	10.202	9.590	6.382	± 10
		Body	1g	9.943	9.684	2.675	± 10
	1900	Head	1g	41.551	39.648	4.803	± 10
		Body	1g	39.976	39.769	0.521	± 10

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

SAR SYSTEM VALIDATION DATA**Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)****System Performance Check 835MHz Head Liquid****Dipole 835 MHz; Type: ALS-D-835-S-2; S/N: 180-00558**

Product Data

Device Name : Dipole 835 MHz
Serial No. : 180-00558
Type : Dipole
Model : ALS-D-835-S-2
Frequency Band : 835
Max. Transmit Pwr : 1 w
Drift Time : 3 min(s)
Power Drift-Start : 10.284 W/kg
Power Drift-Finish : 10.021W/kg
Power Drift (%) : -2.563

Phantom Data

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

Tissue Data

Type : HEAD
Serial No. : 270-01002
Frequency : 835.00 MHz
Last Calib. Date : 15-Oct-2012
Temperature : 20.00 °C
Ambient Temp. : 21.00 °C
Humidity : 56.00 RH%
Epsilon : 41.17 F/m
Sigma : 0.90 S/m
Density : 1000.00 kg/cu. m

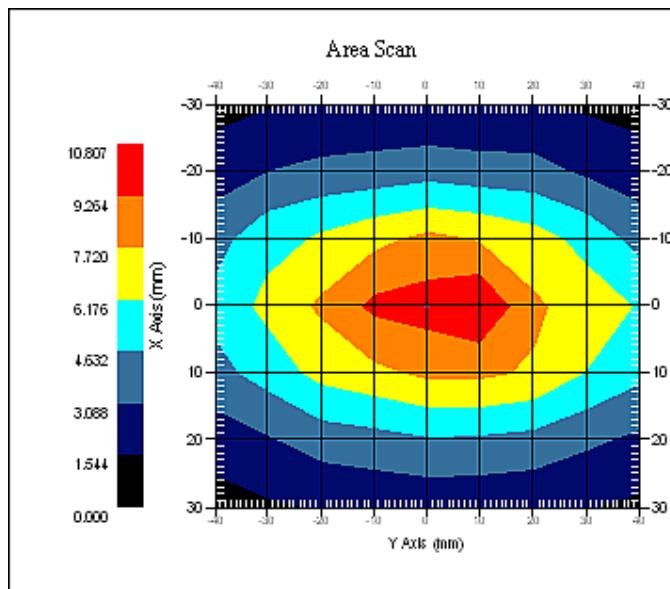
Probe Data

Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 500-00283
Last Calib. Date : 09-Aug-2012
Frequency Band : 835
Duty Cycle Factor : 1
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μV/(V/m)2
Compression Point : 95.00 mV
Offset : 1.56 mm

Measurement Data

Crest Factor : 1
Scan Type : Complete
Tissue Temp. : 21.00 °C
Ambient Temp. : 21.00 °C
Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 10.202 W/kg
10 gram SAR value : 6.637 W/kg
Area Scan Peak SAR : 10.806 W/kg
Zoom Scan Peak SAR : 18.778 W/kg



835 MHz System Validation with Head Tissue

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**System Performance Check 835 MHz Body Liquid****Dipole 835 MHz; Type: ALS-D-835-S-2; S/N: 180-00558****Product Data**

Device Name : Dipole 835 MHz
Serial No. : 180-00558
Type : Dipole
Model : ALS-D-835-S-2
Frequency Band : 835
Max. Transmit Pwr : 1 W
Drift Time : 3 min(s)
Power Drift-Start : 9.922 W/kg
Power Drift-Finish : 10.035 W/kg
Power Drift (%) : 1.247

Phantom Data

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

Tissue Data

Type : Body
Serial No. : 270-02101
Frequency : 835.00MHz
Last Calib. Date : 15-Oct-2012
Temperature : 20.00 °C
Ambient Temp. : 21.00 °C
Humidity : 56.00 RH%
Epsilon : 54.26 F/m
Sigma : 0.97 S/m
Density : 1000.00 kg/cu. m

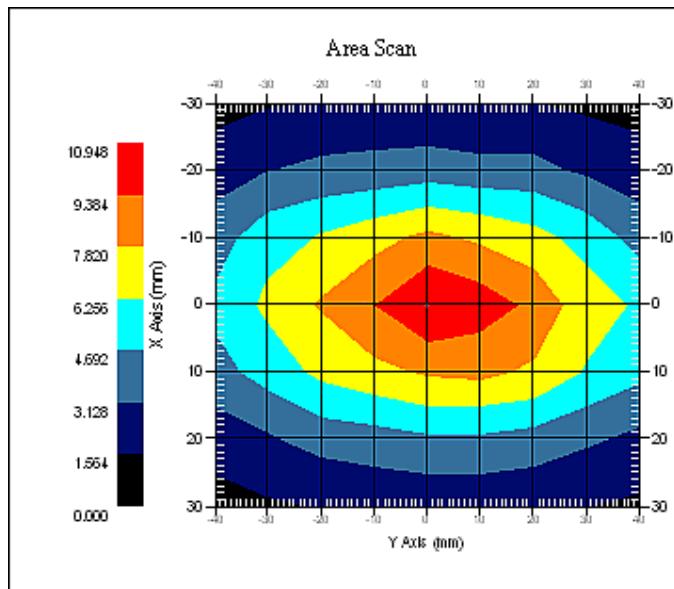
Probe Data

Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 500-00283
Last Calib. Date : 09-Aug-2012
Frequency Band : 835
Duty Cycle Factor : 1
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 µV/(V/m)2
Compression Point : 95.00 mV
Offset : 1.56 mm

Measurement Data

Crest Factor : 1
Scan Type : Complete
Tissue Temp. : 21.00 °C
Ambient Temp. : 21.00 °C
Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 9.943 W/kg
10 gram SAR value : 6.592 W/kg
Area Scan Peak SAR : 10.948 W/kg
Zoom Scan Peak SAR : 17.569 W/kg



835 MHz System Validation with Body Tissue

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**System Performance Check 1900 Head Liquid****Dipole 1900 MHz; Type: ALS-D-1900-S-2; S/N: 210-00710****Product Data**

Device Name : Dipole 1900MHz
Serial No. : 210-00710
Type : Dipole
Model : ALS-D-1900-S-2
Frequency Band : 1900
Max. Transmit Pwr : 1 W
Drift Time : 3 min(s)
Power Drift-Start : 42.527 W/kg
Power Drift-Finish : 42.004W/kg
Power Drift (%) : -1.227

Phantom Data

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

Tissue Data

Type : HEAD
Serial No. : 295-01103
Frequency : 1900.00 MHz
Last Calib. Date : 15-Oct-2012
Temperature : 20.00 °C
Ambient Temp. : 21.00 °C
Humidity : 56.00 RH%
Epsilon : 40.75 F/m
Sigma : 1.44 S/m
Density : 1000.00 kg/cu. M

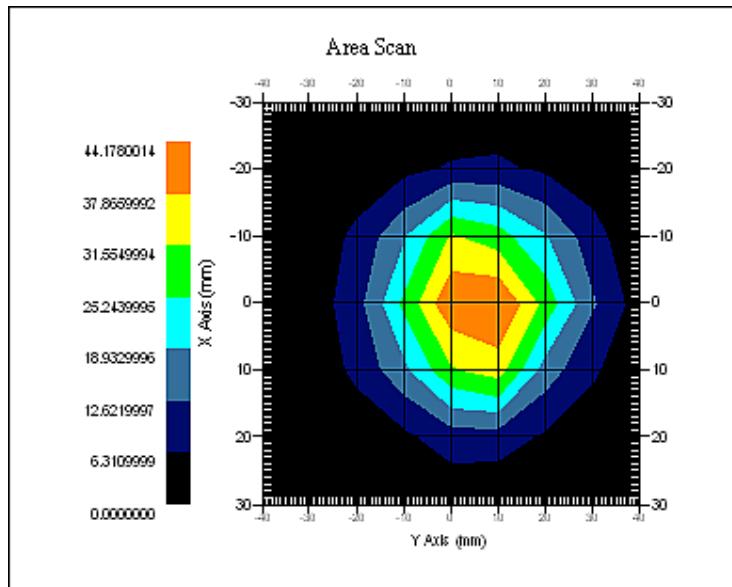
Probe Data

Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 500-00283
Last Calib. Date : 09-Aug-2012
Frequency Band : 1900
Duty Cycle Factor : 1
Conversion Factor : 5.20
Probe Sensitivity : 1.20 1.20 1.20 µV/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

Measurement Data

Crest Factor : 1
Scan Type : Complete
Tissue Temp. : 20.00 °C
Ambient Temp. : 20.00 °C
Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 41.551 W/kg
10 gram SAR value : 23.019 W/kg
Area Scan Peak SAR : 44.178 W/kg
Zoom Scan Peak SAR : 99.213W/kg



1900 MHz System Validation with Head Tissue

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**System Performance Check 1900 Body Liquid****Dipole 1900 MHz; Type: ALS-D-1900-S-2; S/N: 210-00710****Product Data**

Device Name : Dipole 1900MHz
Serial No. : 210-00710
Type : Dipole
Model : ALS-D-1900-S-2
Frequency Band : 1900
Max. Transmit Pwr : 1 W
Drift Time : 3 min(s)
Power Drift-Start : 41.894 W/kg
Power Drift-Finish : 41.173 W/kg
Power Drift (%) : -1.718

Phantom Data

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

Tissue Data

Type : Body
Serial No. : 295-02102
Frequency : 1900.00 MHz
Last Calib. Date : 15-Oct-2012
Temperature : 20.00 °C
Ambient Temp. : 21.00 °C
Humidity : 56.00 RH%
Epsilon : 55.42 F/m
Sigma : 1.56 S/m
Density : 1000.00 kg/cu. m

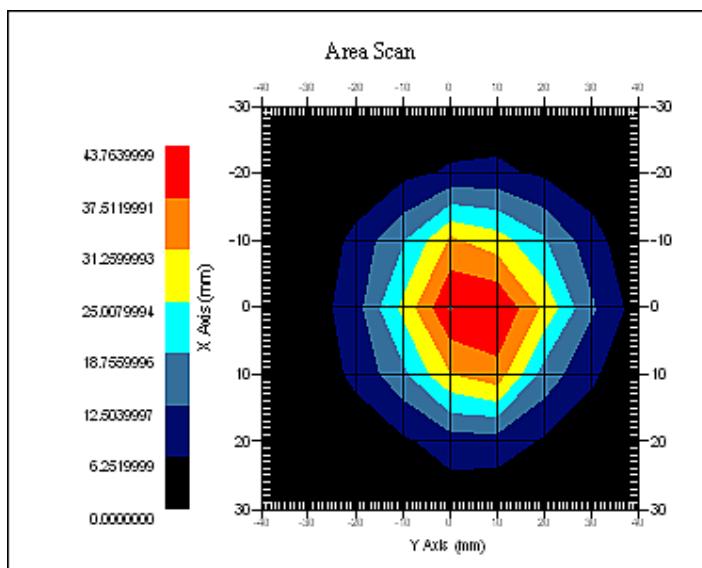
Probe Data

Name : E-Field
Model : E-020
Type : E-Field Triangle
Serial No. : 500-00283
Last Calib. Date : 09-Aug-2012
Frequency Band : 1900
Duty Cycle Factor : 1
Conversion Factor : 5.0
Probe Sensitivity : 1.20 1.20 1.20 μV/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

Measurement Data

Crest Factor : 1
Scan Type : Complete
Tissue Temp. : 20.00 °C
Ambient Temp. : 21.00 °C
Area Scan : 7x9x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm

1 gram SAR value : 39.976 W/kg
10 gram SAR value : 22.180 W/kg
Area Scan Peak SAR : 43.764 W/kg
Zoom Scan Peak SAR : 92.316 W/kg



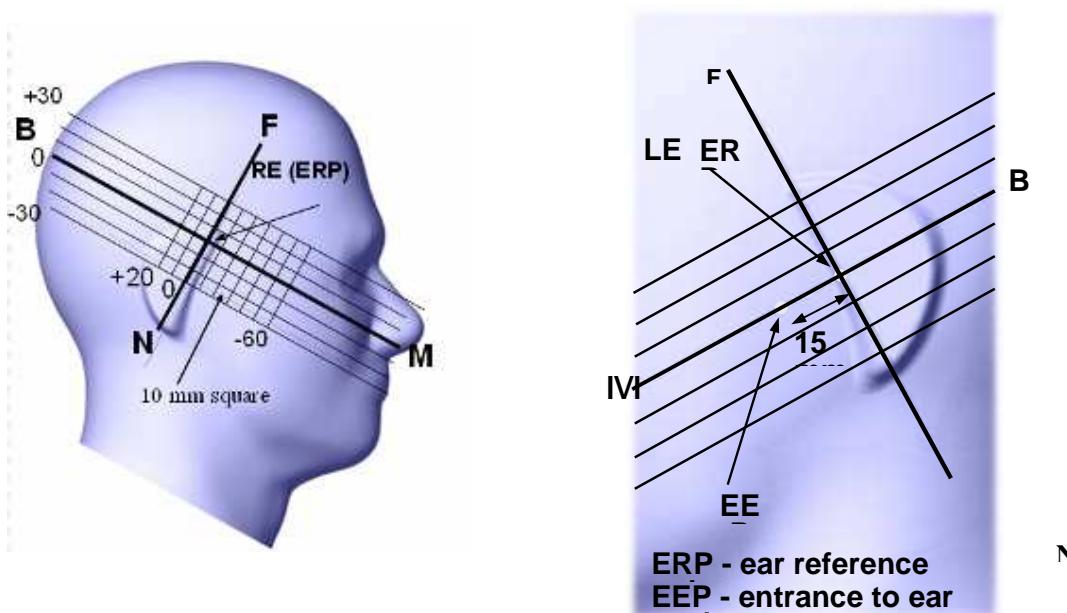
1900 MHz System Validation with Body Tissue

EUT TEST STRATEGY AND METHODOLOGY

Test Positions for Device Operating Next to a Person's Ear

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

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



Cheek/Touch Position

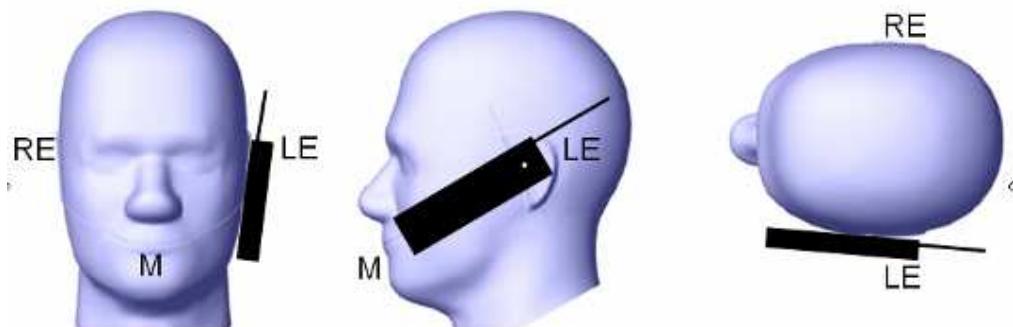
The device is brought toward the mouth of the head phantom by pivoting against the “ear reference point” or along the “N-F” line for the SCC-34/SC-2 head phantom.

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

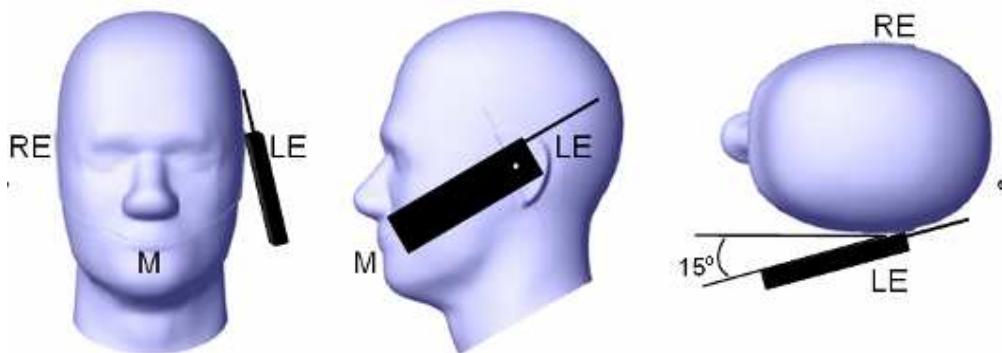
With the handset aligned in the “Cheek/Touch Position”:

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°-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, Ear/Ear, extended and retracted) is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

Ear /Tilt 15° Position



Test positions for body-worn and other configurations

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

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

SAR Evaluation Procedure

The evaluation was performed with the following procedure:

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

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

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

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

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

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

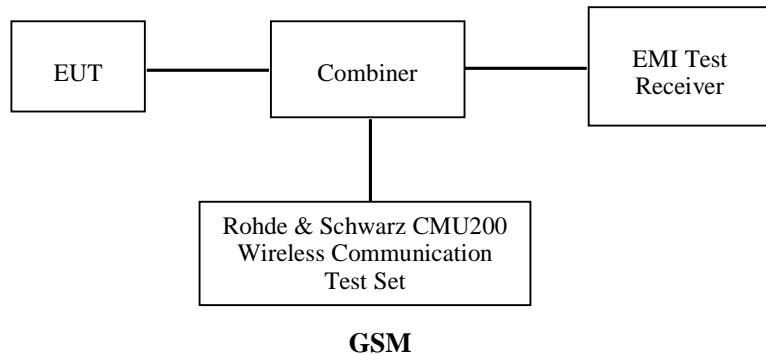
CONDUCTED OUTPUT POWER MEASUREMENT

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.



Test Results:

GSM

Band	Frequency (MHz)	Conducted Output Power	
		(dBm)	(Watt)
Cellular Band	824.2	32.85	1.928
	836.6	32.80	1.905
	848.8	32.75	1.884
PCS Band	1850.2	29.13	0.818
	1880.0	29.38	0.867
	1909.8	29.61	0.914

GPRS

Mode	Channel No.	Frequency (MHz)	RF Output Power (dBm)			
			1 slot	2 slot	3 slots	4 slots
Cellular	128	824.2	32.82	31.96	30.16	29.22
	190	836.6	32.78	31.95	30.2	29.27
	251	848.8	32.74	31.96	30.21	29.29
PCS	512	1850.2	29.32	28.39	26.7	25.85
	661	1880.0	29.55	28.59	26.94	26.09
	810	1909.8	29.81	28.86	27.24	26.41

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
Cellular	128	824.2	23.82	25.96	25.91	26.22
	190	836.6	23.78	25.95	25.95	26.27
	251	848.8	23.74	25.96	25.96	26.29
PCS	512	1850.2	20.32	22.39	22.45	22.85
	661	1880.0	20.55	22.59	22.69	23.09
	810	1909.8	20.81	22.86	22.99	23.41

Note:

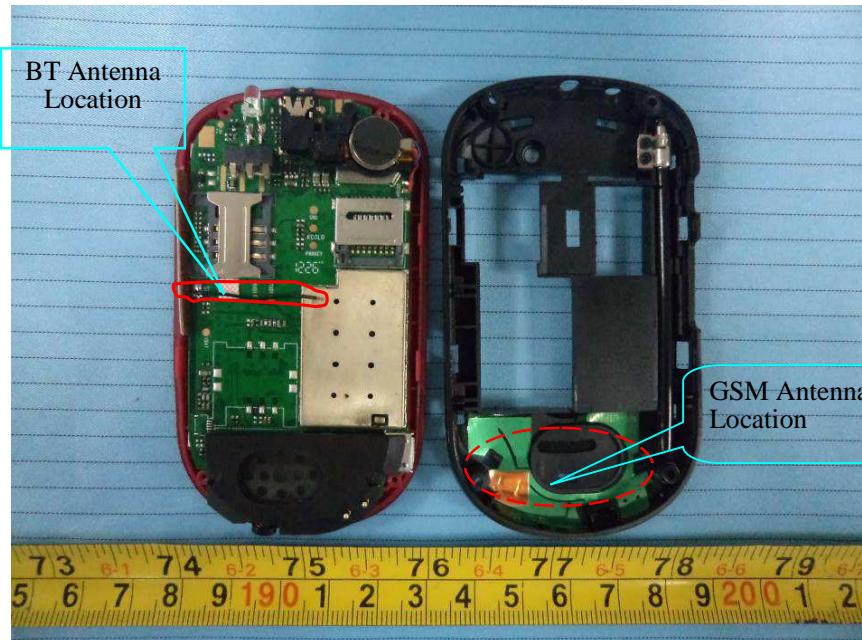
1. Rohde & Schwarz Radio Communication Tester (CMU200) was used for the measurement of GSM peak and average output power for active timeslots.
2. For GSM voice, 1 timeslot has been activated with power level 5 (850 MHz band) and 0 (1900 MHz band).
3. For GPRS, 1,2, 3 and 4 timeslots has been activated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

SAR SIMULTANEOUS TRANSMISSION EVALUATION

KDB648474 SIMULTANEOUS TRANSMITION CONSIDERATION

Stand-alone and simultaneous SAR evaluation for a cell phone with multiple transmitters is base on the antennas distance of each radio.

BT and GSM Antenna Location:



Antenna Information:

Antenna-to-antenna separation distances:	21mm from GSM main antenna-to-BT main antenna
Simultaneous transmission:	GSM can transmit simultaneously with Bluetooth.

CONCLUSION:

Individual transmitter	Stand-alone SAR	Simultaneous SAR
Bluetooth	Not required	Not required
GSM	Required	Simultaneous SAR of Bluetooth and GSM is not required

Note:

- 1) The distance between BT and GSM antenna is 2.1cm < 2.5cm, The max output power of Bluetooth antenna is(7.31dBm) 5.383mW < P_{Ref}(12mW) and the maximum SAR of GSM is 0.784W/kg < 1.2W/kg. According to KDB648474, stand-alone SAR is not required for BT antenna and simultaneous SAR evaluation is not required for Bluetooth with GSM.
- 2) P_{Ref} is defined as the maximum conducted power available at the antenna according to source-based time-averaging requirements of Section 2.1093(d)(5).

SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

SAR Test Data

Environmental Conditions

Temperature:	21-22° C
Relative Humidity:	55-56%
ATM Pressure:	1001-1002 mbar

* Testing was performed by Sandy Wang on 2012-10-15 to 2012-10-16.

Cellular Band:

EUT Position	Frequency (MHz)		Test Mode	Antenna Type	Phantom Type	Power Drift (%)	FCC 1g SAR (W/Kg)	
	Channel	MHz					Measurement	Limit
Left Head Cheek	128(Low)	824.2	GSM	Integral	SAM	-1.277	0.540	1.6
	190(Middle)	836.6	GSM	Integral	SAM	/	/	1.6
	251(High)	848.8	GSM	Integral	SAM	/	/	1.6
Left Head Tilt	128(Low)	824.2	GSM	Integral	SAM	-0.922	0.147	1.6
	190(Middle)	836.6	GSM	Integral	SAM	/	/	1.6
	251(High)	848.8	GSM	Integral	SAM	/	/	1.6
Right Head Cheek	128(Low)	824.2	GSM	Integral	SAM	1.241	0.617	1.6
	190(Middle)	836.6	GSM	Integral	SAM	/	/	1.6
	251(High)	848.8	GSM	Integral	SAM	/	/	1.6
Right Head Tilt	128(Low)	824.2	GSM	Integral	SAM	-2.342	0.154	1.6
	190(Middle)	836.6	GSM	Integral	SAM	/	/	1.6
	251(High)	848.8	GSM	Integral	SAM	/	/	1.6
Body-Worn Headset-Front (1.5cm)	128(Low)	824.2	GSM	Integral	Universal	1.193	0.261	1.6
	190(Middle)	836.6	GSM	Integral	Universal	/	/	1.6
	251(High)	848.8	GSM	Integral	Universal	/	/	1.6
Body-Worn Headset-Back (1.5cm)	128(Low)	824.2	GSM	Integral	Universal	-1.465	0.480	1.6
	190(Middle)	836.6	GSM	Integral	Universal	/	/	1.6
	251(High)	848.8	GSM	Integral	Universal	/	/	1.6
Body-Worn -Front (1.5cm)	128(Low)	824.2	GPRS	Integral	Universal	/	/	1.6
	190(Middle)	836.6	GPRS	Integral	Universal	/	/	1.6
	251(High)	848.8	GPRS	Integral	Universal	-1.819	0.439	1.6
Body-Worn -Back (1.5cm)	128(Low)	824.2	GPRS	Integral	Universal	/	/	1.6
	190(Middle)	836.6	GPRS	Integral	Universal	/	/	1.6
	251(High)	848.8	GPRS	Integral	Universal	-1.162	0.784	1.6

Note:

- When the 1-g SAR is $\leq 0.8\text{W/kg}$, testing for other channels are optional.

PCS Band:

EUT Position	Frequency (MHz)		Test Mode	Antenna Type	Phantom Type	Power Drift (%)	FCC 1g SAR (W/Kg)	
	Channel	MHz					Measurement	Limit
Left Head Cheek	512(Low)	1850.2	GSM	Integral	SAM	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	SAM	/	/	1.6
	810(High)	1909.8	GSM	Integral	SAM	3.581	0.378	1.6
Left Head Tilt	512(Low)	1850.2	GSM	Integral	SAM	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	SAM	/	/	1.6
	810(High)	1909.8	GSM	Integral	SAM	-2.303	0.106	1.6
Right Head Cheek	512(Low)	1850.2	GSM	Integral	SAM	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	SAM	/	/	1.6
	810(High)	1909.8	GSM	Integral	SAM	-3.895	0.369	1.6
Right Head Tilt	512(Low)	1850.2	GSM	Integral	SAM	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	SAM	/	/	1.6
	810(High)	1909.8	GSM	Integral	SAM	0.934	0.104	1.6
Body-Worn Headset-Front (1.5cm)	512(Low)	1850.2	GSM	Integral	Universal	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	Universal	/	/	1.6
	810(High)	1909.8	GSM	Integral	Universal	2.032	0.060	1.6
Body-Worn Headset-Back (1.5cm)	512(Low)	1850.2	GSM	Integral	Universal	/	/	1.6
	661(Middle)	1880.0	GSM	Integral	Universal	/	/	1.6
	810(High)	1909.8	GSM	Integral	Universal	-2.757	0.269	1.6
Body-Worn -Front (1.5cm)	512(Low)	1850.2	GPRS	Integral	Universal	/	/	1.6
	661(Middle)	1880.0	GPRS	Integral	Universal	/	/	1.6
	810(High)	1909.8	GPRS	Integral	Universal	-1.174	0.108	1.6
Body-Worn -Back (1.5cm)	512(Low)	1850.2	GPRS	Integral	Universal	/	/	1.6
	661(Middle)	1880.0	GPRS	Integral	Universal	/	/	1.6
	810(High)	1909.8	GPRS	Integral	Universal	-1.768	0.489	1.6

Note:

1. The EUT is a Class B mobile phone which can be attached to both GPRS and GSM services, using one service at a time.
2. 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, 1 DL+4UL is the worse case.
3. The EUT transmit and receive through the same GSM antenna while testing SAR.
4. When the 1-g SAR is $\leq 0.8\text{W/kg}$, testing for other channels are optional

EUT SCAN RESULTS

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

Left Head Cheek (824.2 MHz Low Channel)

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.078 W/kg
Power Drift-Finish : 0.077 W/kg
Power Drift (%) : -1.277

Tissue Data

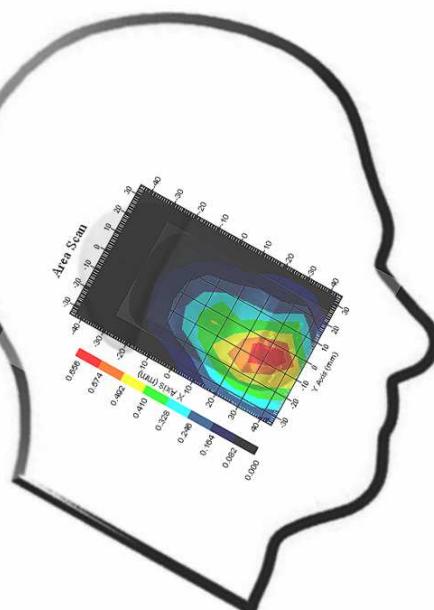
Type : Head
Frequency : 824.20 MHz
Epsilon : 41.21 F/m
Sigma : 0.88 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.540 W/kg
10 gram SAR value : 0.313 W/kg
Area Scan Peak SAR : 0.563 W/kg
Zoom Scan Peak SAR : 0.816 W/kg

Plot 1#



Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Tilt (824.2 MHz Low Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.024 W/kg
Power Drift-Finish : 0.024 W/kg
Power Drift (%) : -0.922

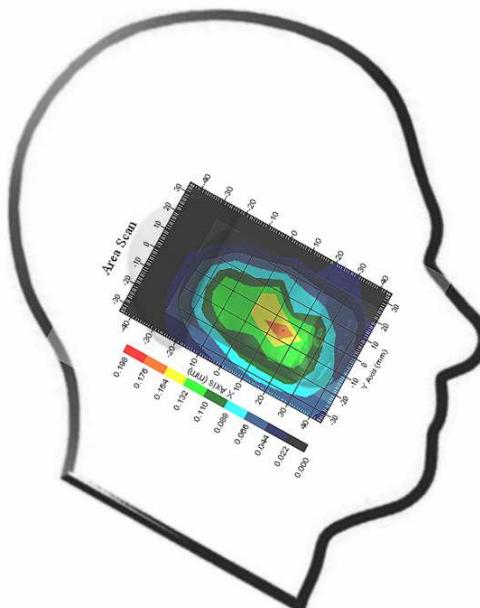
Tissue Data

Type : Head
Frequency : 824.20 MHz
Epsilon : 41.21 F/m
Sigma : 0.88 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.147 W/kg
10 gram SAR value : 0.098 W/kg
Area Scan Peak SAR : 0.178 W/kg
Zoom Scan Peak SAR : 0.270 W/kg

Plot 2#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Cheek (824.2 MHz Low Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.080 W/kg
Power Drift-Finish : 0.081 W/kg
Power Drift (%) : 1.241

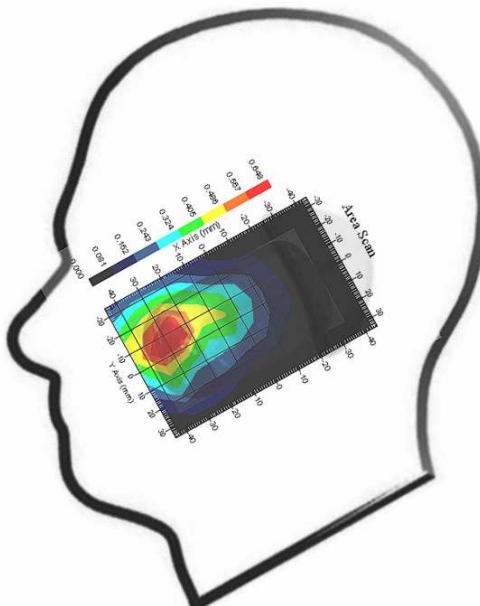
Tissue Data

Type : Head
Frequency : 824.20 MHz
Epsilon : 41.21 F/m
Sigma : 0.88 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.617 W/kg
10 gram SAR value : 0.321 W/kg
Area Scan Peak SAR : 0.648 W/kg
Zoom Scan Peak SAR : 0.934 W/kg

Plot 3#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Tilt (824.2 MHz Low Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1: Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7: Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.021 W/kg
Power Drift-Finish : 0.021 W/kg
Power Drift (%) : -2.342

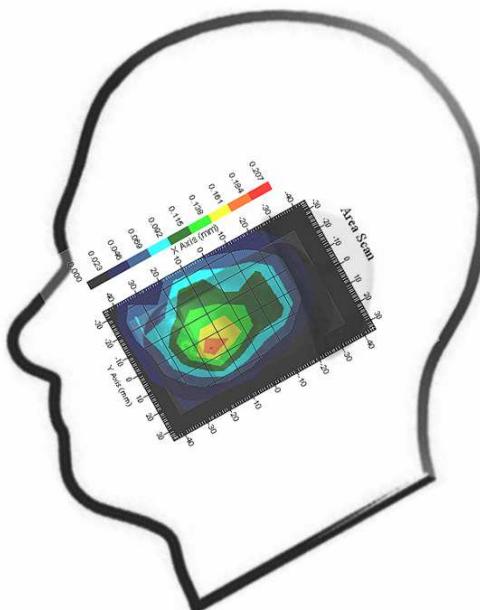
Tissue Data

Type : Head
Frequency : 824.20 MHz
Epsilon : 41.21 F/m
Sigma : 0.88 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.154 W/kg
10 gram SAR value : 0.096 W/kg
Area Scan Peak SAR : 0.185 W/kg
Zoom Scan Peak SAR : 0.366 W/kg

Plot 4#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn Front-Headset (824.2 MHz Low Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.252 W/kg
Power Drift-Finish : 0.255 W/kg
Power Drift (%) : 1.193

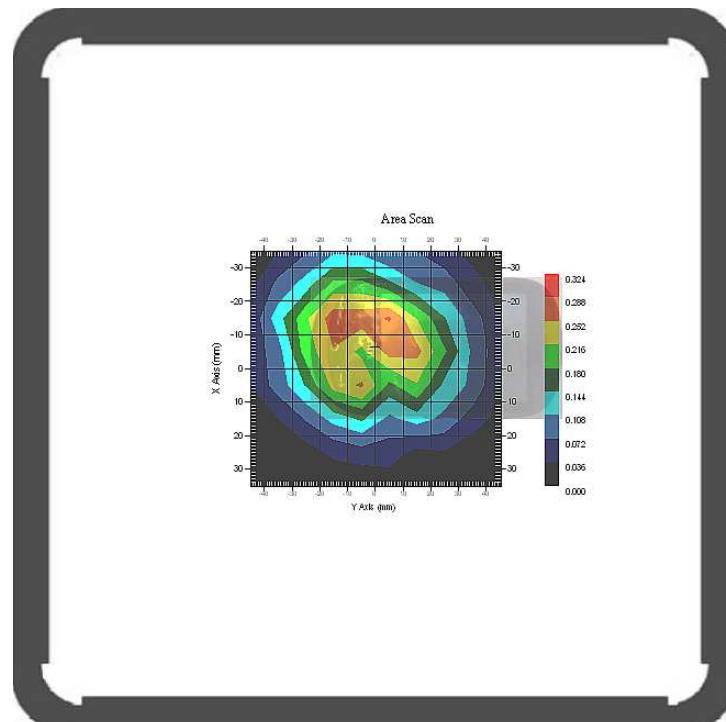
Tissue Data

Type : Body
Frequency : 824.20 MHz
Epsilon : 55.19 F/m
Sigma : 0.95 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.261 W/kg
10 gram SAR value : 0.176 W/kg
Area Scan Peak SAR : 0.291 W/kg
Zoom Scan Peak SAR : 0.440 W/kg

Plot 5#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn Back-Headset (824.2 MHz Low Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.486 W/kg
Power Drift-Finish : 0.479 W/kg
Power Drift (%) : -1.465

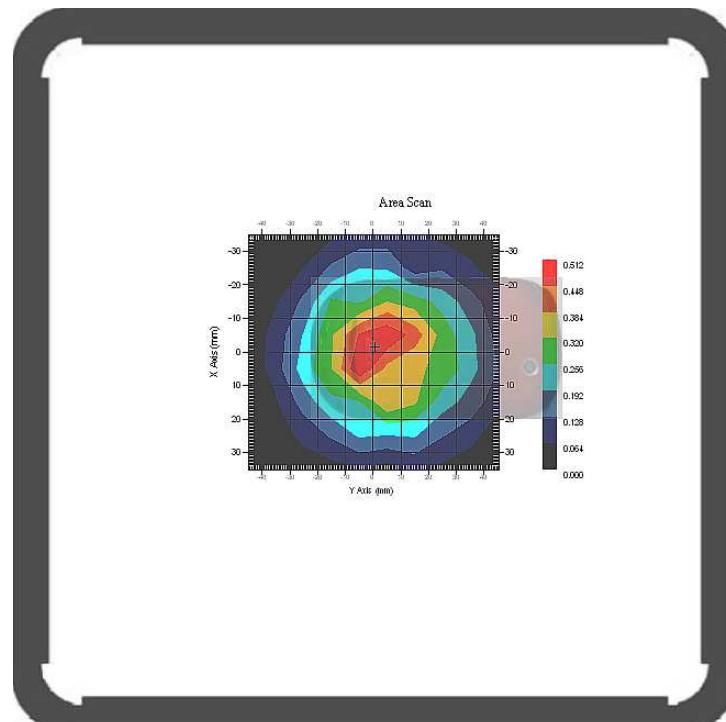
Tissue Data

Type : Body
Frequency : 824.20 MHz
Epsilon : 55.19 F/m
Sigma : 0.95 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 8
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.480W/kg
10 gram SAR value : 0.259 W/kg
Area Scan Peak SAR : 0.509 W/kg
Zoom Scan Peak SAR : 0.797 W/kg

Plot 6#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn-Front (848.8 MHz High Channel)**

Measurement Data

Test mode : GPRS
Crest Factor : 2
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.439 W/kg
Power Drift-Finish : 0.431 W/kg
Power Drift (%) : -1.819

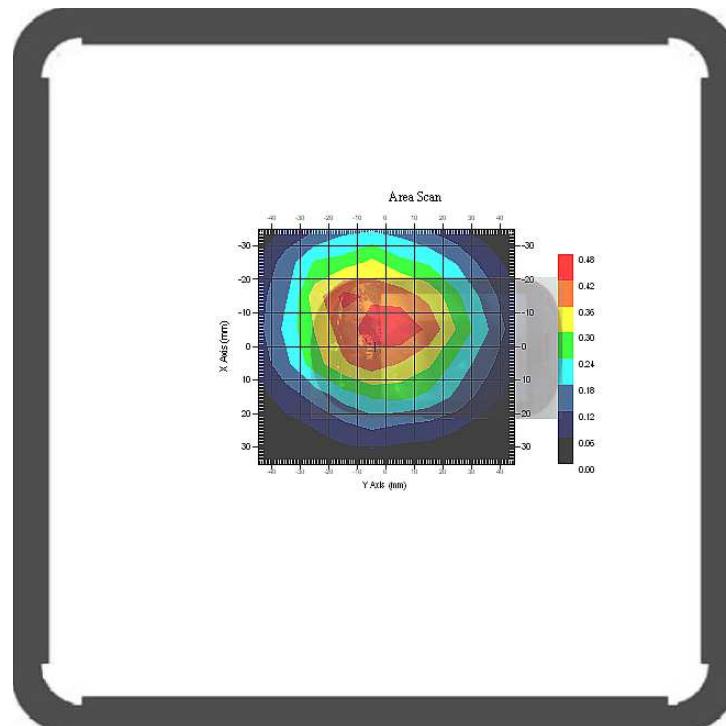
Tissue Data

Type : Body
Frequency : 848.80 MHz
Epsilon : 55.34 F/m
Sigma : 0.99 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 2
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.439 W/kg
10 gram SAR value : 0.248 W/kg
Area Scan Peak SAR : 0.476 W/kg
Zoom Scan Peak SAR : 0.691 W/kg

Plot 7#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn-Back (848.8 MHz High Channel)**

Measurement Data

Test mode : GPRS
Crest Factor : 2
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.769 W/kg
Power Drift-Finish : 0.760 W/kg
Power Drift (%) : -1.162

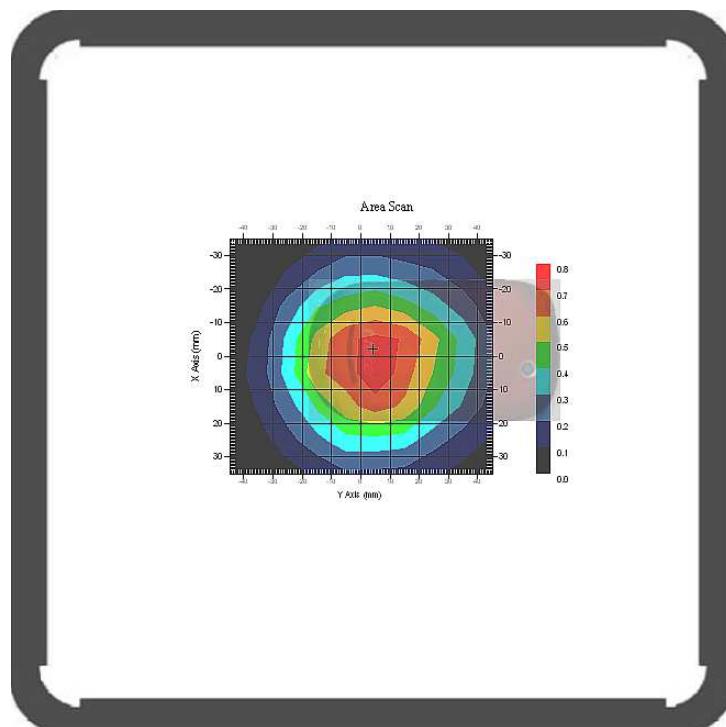
Tissue Data

Type : Body
Frequency : 848.80 MHz
Epsilon : 55.34 F/m
Sigma : 0.99 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 835
Duty Cycle Factor : 2
Conversion Factor : 6.6
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.784 W/kg
10 gram SAR value : 0.453 W/kg
Area Scan Peak SAR : 0.800 W/kg
Zoom Scan Peak SAR : 1.040 W/kg

Plot 8#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Cheek (1909.8 MHz High Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.028 W/kg
Power Drift-Finish : 0.029 W/kg
Power Drift (%) : 3.581

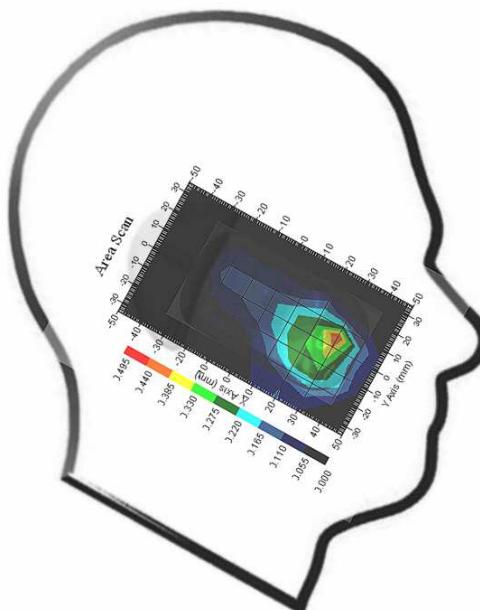
Tissue Data

Type : Head
Frequency : 1909.80 MHz
Epsilon : 40.75 F/m
Sigma : 1.44 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.2
Probe Sensitivity : 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.378 W/kg
10 gram SAR value : 0.216 W/kg
Area Scan Peak SAR : 0.443 W/kg
Zoom Scan Peak SAR : 0.781 W/kg

Plot 9#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Left Head Tilt (1909.8 MHz High Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.009 W/kg
Power Drift-Finish : 0.009 W/kg
Power Drift (%) : -2.303

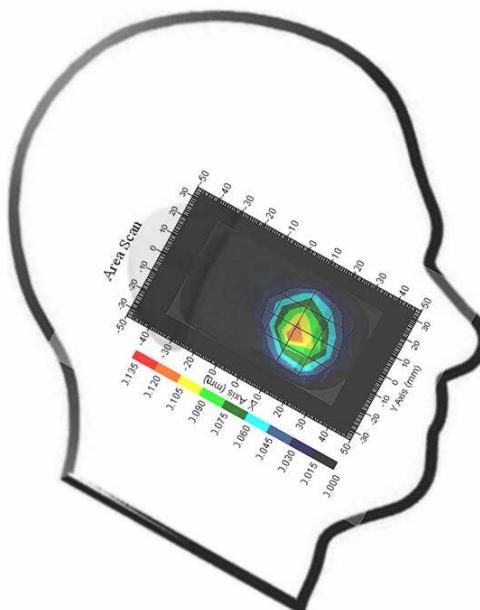
Tissue Data

Type : Head
Frequency : 1909.80 MHz
Epsilon : 40.75 F/m
Sigma : 1.44 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.2
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.106 W/kg
10 gram SAR value : 0.057 W/kg
Area Scan Peak SAR : 0.122 W/kg
Zoom Scan Peak SAR : 0.330 W/kg

Plot 10#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Cheek (1909.8 MHz High Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.025 W/kg
Power Drift-Finish : 0.024 W/kg
Power Drift (%) : -3.895

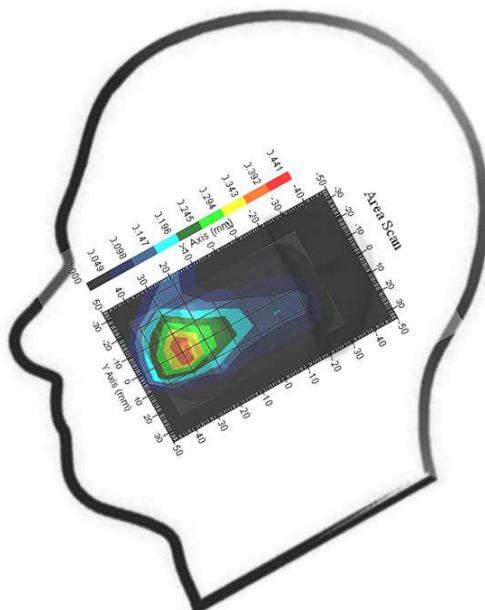
Tissue Data

Type : Head
Frequency : 1909.80 MHz
Epsilon : 40.75 F/m
Sigma : 1.44 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.2
Probe Sensitivity : 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.369 W/kg
10 gram SAR value : 0.198 W/kg
Area Scan Peak SAR : 0.393 W/kg
Zoom Scan Peak SAR : 0.617 W/kg

Plot 11#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Right Head Tilt (1909.8 MHz High Channel)****Measurement Data**

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 11x8x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.008 W/kg
Power Drift-Finish : 0.009 W/kg
Power Drift (%) : 0.934

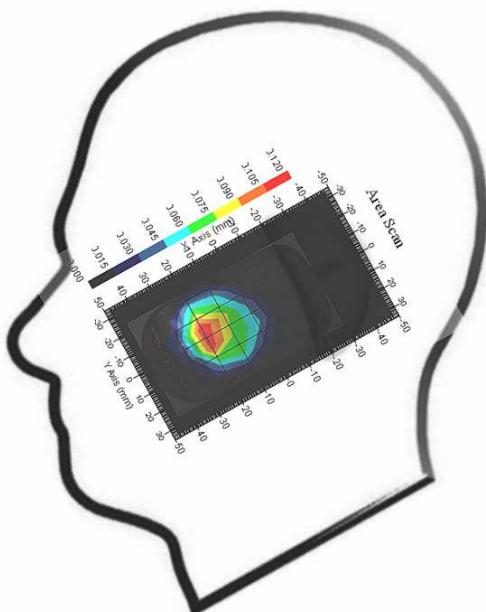
Tissue Data

Type : Head
Frequency : 1909.80 MHz
Epsilon : 40.75 F/m
Sigma : 1.44 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.2
Probe Sensitivity : 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.104 W/kg
10 gram SAR value : 0.058 W/kg
Area Scan Peak SAR : 0.119 W/kg
Zoom Scan Peak SAR : 0.291 W/kg

Plot 12#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn Front-Headset (1909.8 MHz High Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.049W/kg
Power Drift-Finish : 0.050W/kg
Power Drift (%) : 2.032

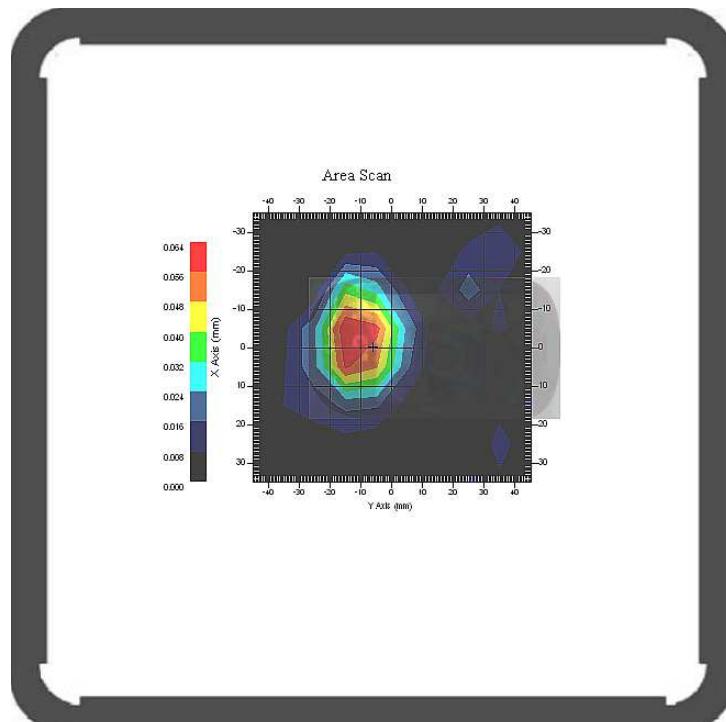
Tissue Data

Type : Body
Frequency : 1909.80 MHz
Epsilon : 53.40 F/m
Sigma : 1.56 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.0
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.060 W/kg
10 gram SAR value : 0.031 W/kg
Area Scan Peak SAR : 0.064 W/kg
Zoom Scan Peak SAR : 0.129 W/kg

Plot 13#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn Back-Headset (1909.8 MHz High Channel)**

Measurement Data

Test mode : GSM
Crest Factor : 8
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.218W/kg
Power Drift-Finish : 0.212W/kg
Power Drift (%) : -2.757

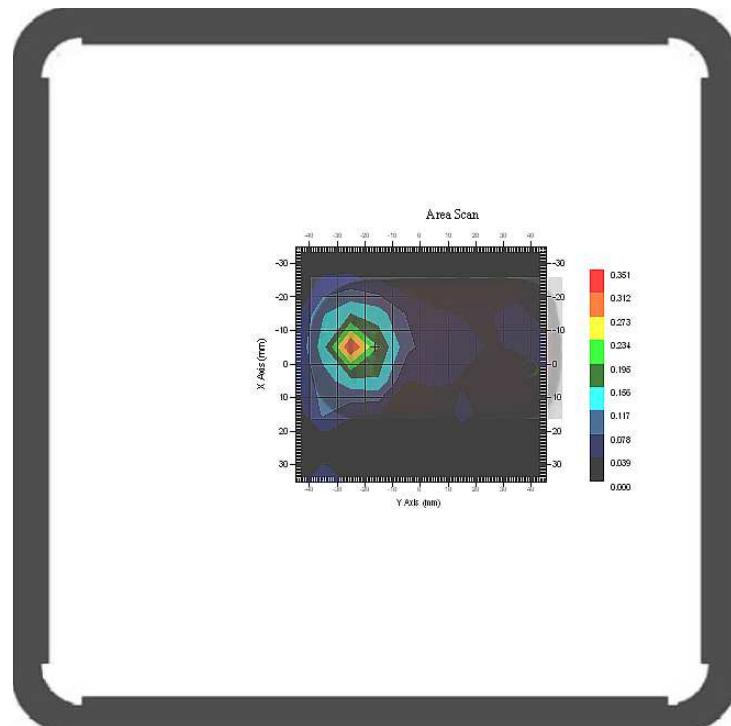
Tissue Data

Type : Body
Frequency : 1909.80 MHz
Epsilon : 53.40 F/m
Sigma : 1.56 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 8
Conversion Factor : 5.0
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.269 W/kg
10 gram SAR value : 0.128 W/kg
Area Scan Peak SAR : 0.313 W/kg
Zoom Scan Peak SAR : 0.490 W/kg

Plot 14#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn-Front (1909.8 MHz High Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 2
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.085W/kg
Power Drift-Finish : 0.084W/kg
Power Drift (%) : -1.174

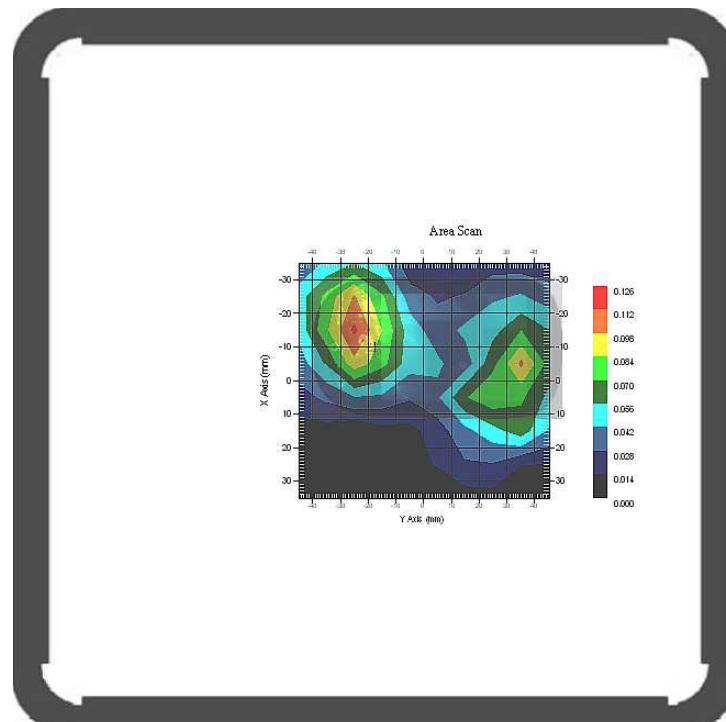
Tissue Data

Type : Body
Frequency : 1909.80 MHz
Epsilon : 53.40 F/m
Sigma : 1.56 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 2
Conversion Factor : 5.0
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.108 W/kg
10 gram SAR value : 0.053 W/kg
Area Scan Peak SAR : 0.115 W/kg
Zoom Scan Peak SAR : 0.189 W/kg

Plot 15#

Test Laboratory: Bay Area Compliance Lab Corp. (Shenzhen)**Body-worn-Back (1909.8 MHz High Channel)****Measurement Data**

Test mode : GPRS
Crest Factor : 2
Scan Type : Complete
Area Scan : 8x11x1 : Measurement x=10mm, y=10mm, z=4mm
Zoom Scan : 7x7x7 : Measurement x=5mm, y=5mm, z=5mm
Power Drift-Start : 0.396W/kg
Power Drift-Finish : 0.389W/kg
Power Drift (%) : -1.768

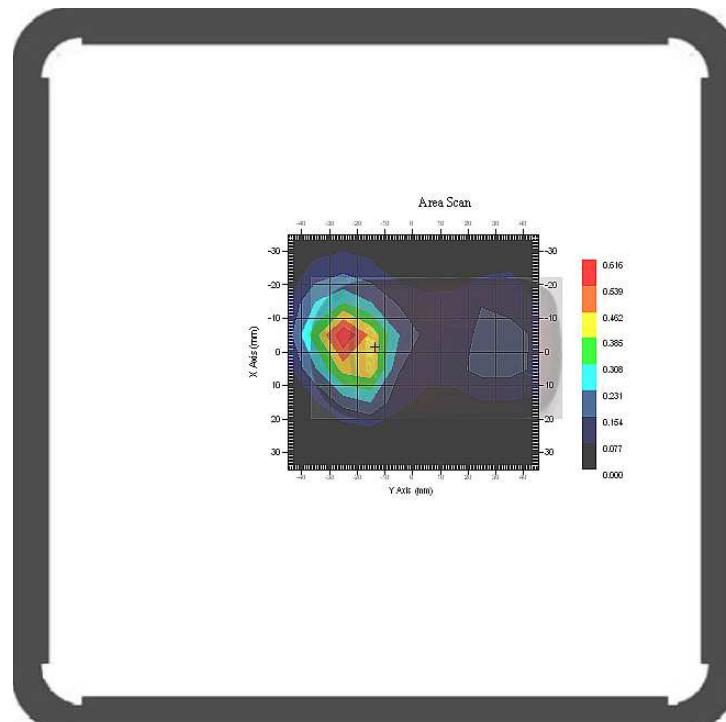
Tissue Data

Type : Body
Frequency : 1909.80 MHz
Epsilon : 53.40 F/m
Sigma : 1.56 S/m
Density : 1000.00 kg/cu. m

Probe Data

Serial No. : 500-00283
Frequency Band : 1900
Duty Cycle Factor : 2
Conversion Factor : 5.0
Probe Sensitivity : 1.20 1.20 1.20 μ V/(V/m)²
Compression Point : 95.00 mV
Offset : 1.56 mm

1 gram SAR value : 0.489 W/kg
10 gram SAR value : 0.236 W/kg
Area Scan Peak SAR : 0.616 W/kg
Zoom Scan Peak SAR : 0.850 W/kg

Plot 16#

APPENDIX A MEASUREMENT UNCERTAINTY

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

Measurement Uncertainty for 300MHz to 3GHz

Source of Uncertainty	Tolerance Value	Probability Distribution	Divisor	$c_i^1 (1-g)$	$c_i^1 (10-g)$	Standard Uncertainty (1-g) %	Standard Uncertainty (10-g) %
Measurement System							
Probe Calibration	3.5	normal	1	1	1	3.5	3.5
Axial Isotropy	3.7	rectangular	$\sqrt{3}$	$(1-cp)^{1/2}$	$(1-cp)^{1/2}$	1.5	1.5
Hemispherical Isotropy	10.9	rectangular	$\sqrt{3}$	\sqrt{cp}	\sqrt{cp}	4.4	4.4
Boundary Effect	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	rectangular	$\sqrt{3}$	1	1	2.7	2.7
Detection Limit	1.0	rectangular	$\sqrt{3}$	1	1	0.6	0.6
Readout Electronics	1.0	normal	1	1	1	1.0	1.0
Response Time	0.8	rectangular	$\sqrt{3}$	1	1	0.5	0.5
Integration Time	1.7	rectangular	$\sqrt{3}$	1	1	1.0	1.0
RF Ambient Condition -Noise	0.95	rectangular	$\sqrt{3}$	1	1	0.55	0.55
RF Ambient Condition - Reflections	3.0	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Probe Positioner Mech. Restrictions	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
Restriction							
Probe Positioning with respect to Phantom Shell	2.9	rectangular	$\sqrt{3}$	1	1	1.7	1.7
Extrapolation and Integration	3.7	rectangular	$\sqrt{3}$	1	1	2.1	2.1
Test Sample Positioning	2.6	normal	1	1	1	2.6	2.6
Device Holder Uncertainty	2.0	normal	1	1	1	2.0	2.0
Drift of Output Power	0.4	rectangular	$\sqrt{3}$	1	1	0.2	0.2
Phantom and Setup							
Phantom Uncertainty(shape & thickness tolerance)	3.4	rectangular	$\sqrt{3}$	1	1	2.0	2.0
Liquid Conductivity(target)	5.0	rectangular	$\sqrt{3}$	0.7	0.5	2.0	1.4
Liquid Conductivity(meas.)	2.6	normal	1	0.7	0.5	1.8	1.3
Liquid Permittivity(target)	5.0	rectangular	$\sqrt{3}$	0.6	0.5	1.7	1.4
Liquid Permittivity(meas.)	2.7	normal	1	0.6	0.5	1.6	1.4
Combined Uncertainty		RSS				9.1	8.8
Combined Uncertainty (coverage factor=2)		Normal(k=2)				18.2	17.6

APPENDIX B PROBE CALIBRATION CERTIFICATES**NCL CALIBRATION LABORATORIES****Calibration File No.: 1427-1430****Client.: BACL Lab****C E R T I F I C A T E O F C A L I B R A T I O N**

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

Equipment: Miniature Isotropic RF Probe

Record of Calibration

Head and Body

Manufacturer: APREL Laboratories

Model No.: E-020

Serial No.: 500-00283

Calibration Procedure: D01-032-E020-V2, D22-012-Tissue, D28-002-Dipole
Project No: BACL-5673**Calibrated:** 8th August 2012
Released on: 9th August 2012

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

Released By:



Art Brennan, Quality Manager

NCL CALIBRATION LABORATORIESSuite 102, 303 Terry Fox Dr.
OTTAWA, ONTARIO
CANADA K2K 3J1Division of APREL Lab.
TEL: (613) 435-8300
FAX: (613) 435-8306

NCL Calibration Laboratories

Division of APREL Inc.

Introduction

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

Calibration Method

Probes are calibrated using the following methods.

<1000MHz

TEM Cell for sensitivity in air

Standard phantom using temperature transfer method for sensitivity in tissue

>1000MHz

Waveguide* method to determine sensitivity in air and tissue

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

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

References

- IEEE Standard 1528 (2003) including Amendment 1
IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
- EN 62209-1 (2006)
Human Exposure to RF Fields from hand-held and body-mounted wireless communication devices - Human models, instrumentation, and procedures-Part 1: Procedure to measure the Specific Absorption Rate (SAR) for hand-held mobile wireless devices
- IEC 62209-2 Ed. 1.0 (2010-03)
Human exposure to RF fields from hand-held and body-mounted wireless devices - Human models, instrumentation, and procedures - Part 2: specific absorption rate (SAR) for wireless communication devices (30 MHz - 6 GHz)
- TP-D01-032-E020-V2 E-Field probe calibration procedure
- 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

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Division of APREL Inc.

Conditions

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

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

Primary Measurement Standards

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

Secondary Measurement Standards

Signal Generator Agilent E4438C -506 MY55182336 June 7, 2013

Attestation

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

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



Art Brennan, Quality Manager



Dan Brooks, Test Engineer

Page 3 of 10

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

NCL Calibration Laboratories

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Probe Summary

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

*Resistive to recommended tissue recipes per IEEE-1528

Sensitivity in Air

Channel X:	1.2 μ V/(V/m) ²
Channel Y:	1.2 μ V/(V/m) ²
Channel Z:	1.2 μ V/(V/m) ²
Diode Compression Point:	95 mV

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Calibration for Tissue (Head H, Body B)

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

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Boundary Effect:

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

Spatial Resolution:

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

DAQ-PAQ Contribution

To minimize the uncertainty calculation all tissue sensitivity values were calculated using a load impedance of $5\text{ M}\Omega$.

Boundary Effect:

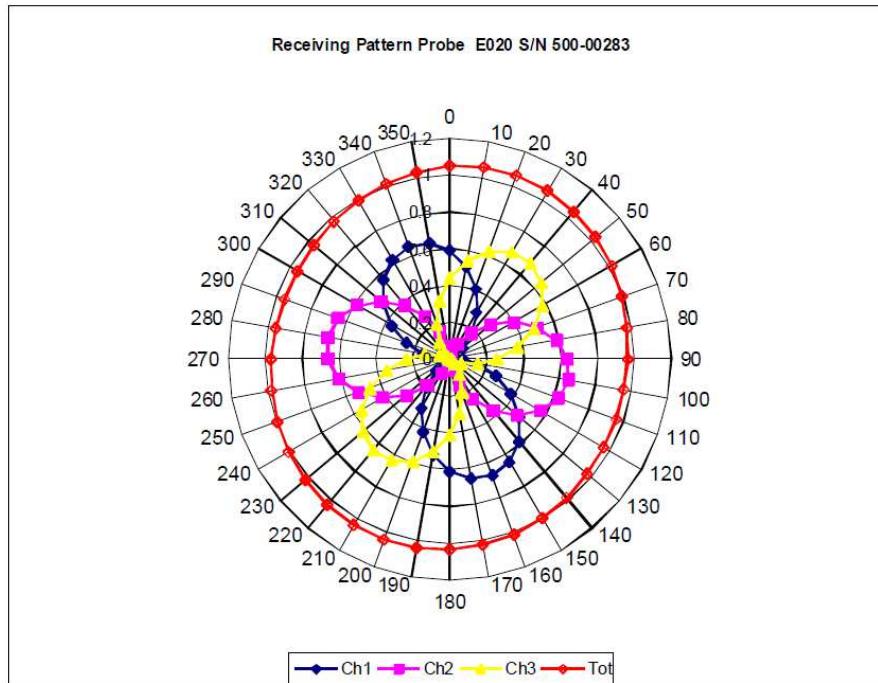
For a distance of 0.58mm the worst case evaluated uncertainty (increase in the probe sensitivity) is less than 2.1%.

NOTES:

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

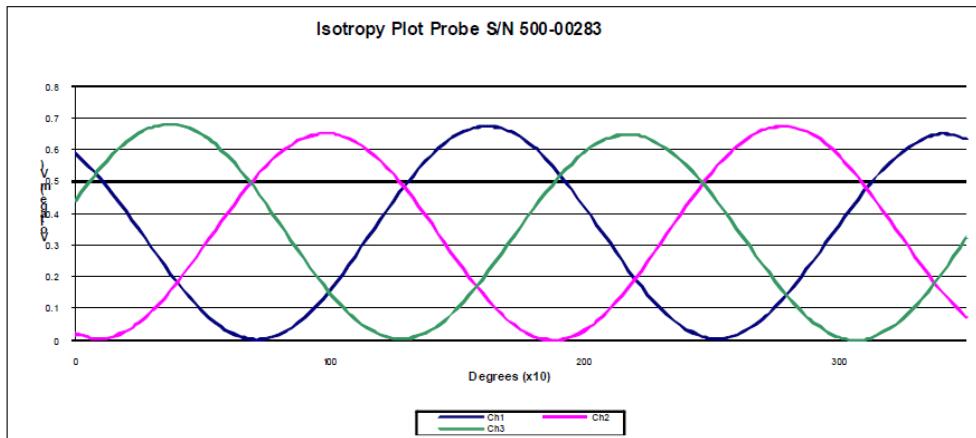
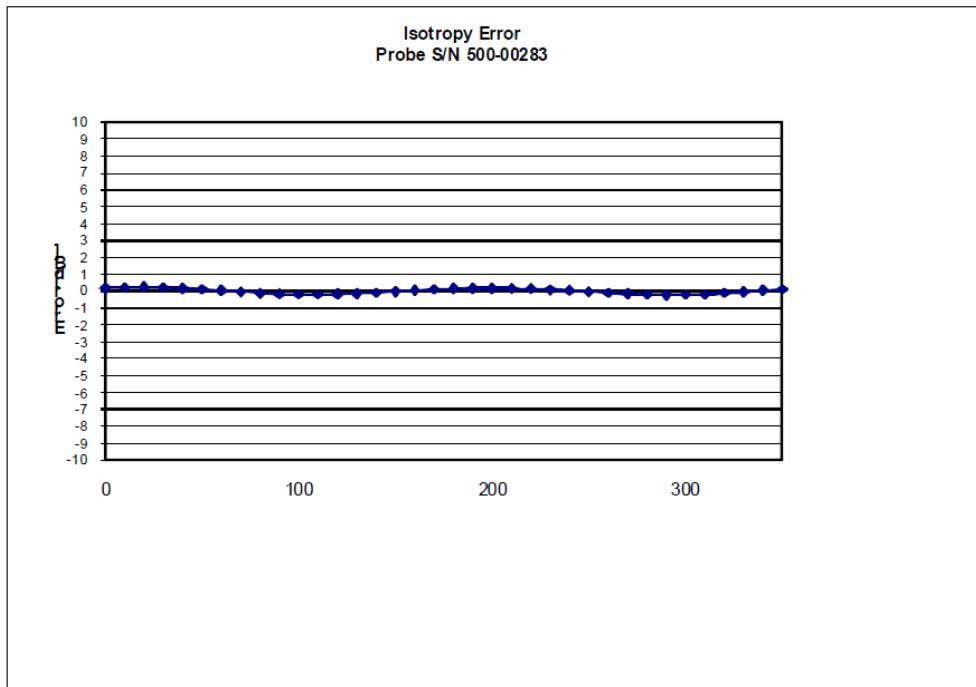
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Receiving Pattern Air

NCL Calibration Laboratories

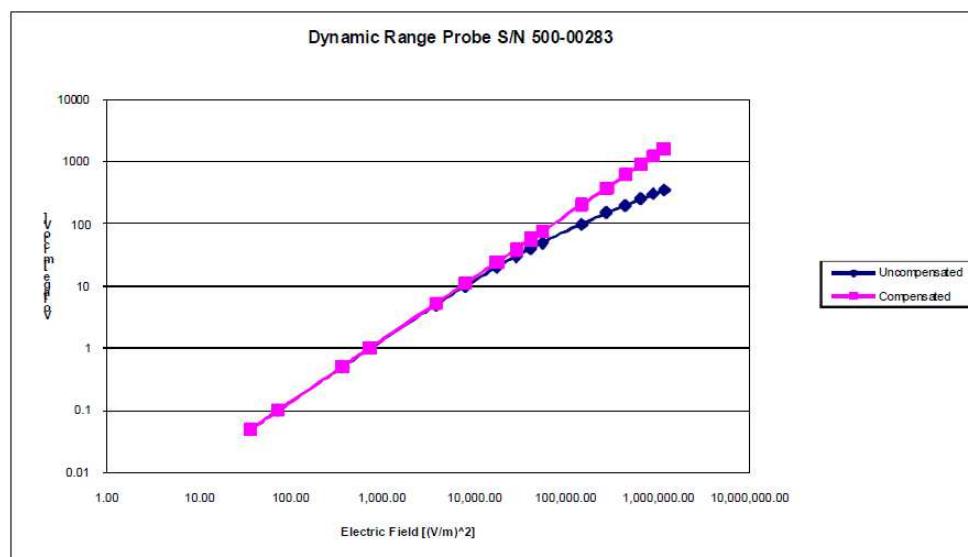
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Isotropy Error Air**Isotropicity Tissue:**

0.10 dB

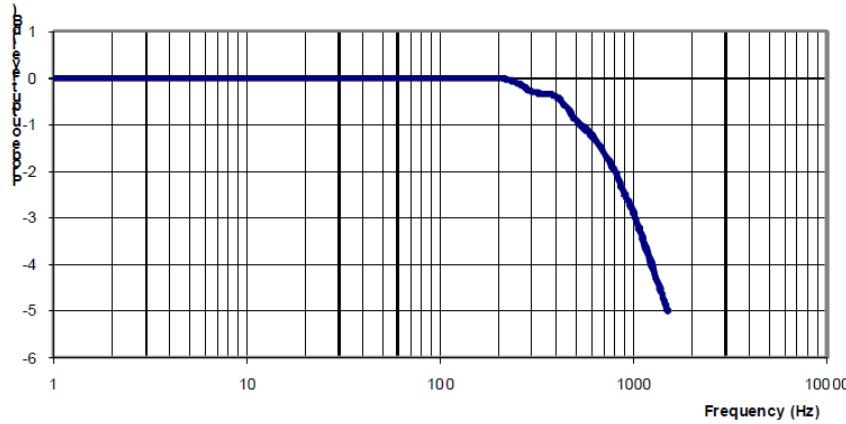
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Dynamic Range

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Video Bandwidth**Probe Frequency Characteristics**

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

Test Equipment

The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List May 2012.

APPENDIX C DIPOLE CALIBRATION CERTIFICATES**NCL CALIBRATION LABORATORIES**

Calibration File No: DC-1327
Project Number: BAC-dipole-cal-5618

C E R T I F I C A T E O F C A L I B R A T I O N

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

Calibrated: 25th August 2011
Released on: 25th August 2011

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

Released By:

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

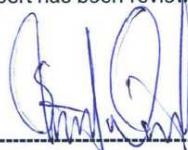
Division of APREL Laboratories.

Conditions

Dipole 180-00558 was received in good condition and a re-calibration.

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

We the undersigned attest that to the best of our knowledge the calibration of this device has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol



C. Teodorian

Primary Measurement Standards

Instrument	Serial Number	Cal due date
Power meter Anritsu MA2408A	245025437	Nov.4, 2011
Power Sensor Anritsu MA2481D	103555	Nov 4, 2011
Attenuator HP 8495A (70dB) 1	944A10711	Aug.8, 2012
Network Analyzer Agilent E5071C	1334746J	Feb. 8, 2012
Secondary Measurement Standards		
Signal Generator Agilent E4438C	-506 MY55182336	June 7, 2012

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

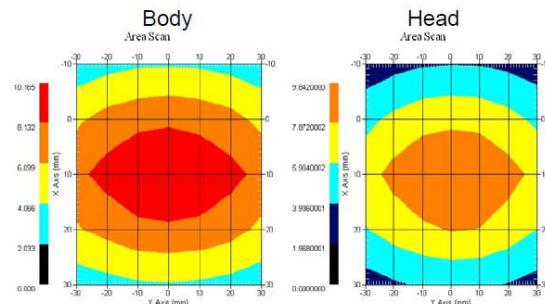
Length: 162.2 mm
Height: 89.4 mm

Electrical Specification

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	835 MHz	1.0417 U	-35.395dB	49.020 Ω
Body	835 MHz	1.1177 U	-25.424dB	55.435 Ω

System Validation Results

Tissue	Frequency	1 Gram	10 Gram	Peak
Head	835 MHz	9.590	6.003	15.013
Body	835 MHz	9.684	6.263	14.23



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-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure
SSI-TP-016 Tissue Calibration Procedure

IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

Conditions

Dipole 180-00558 was new taken from stock.

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.

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

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4

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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

Tissue Type	Return Loss:	SWR:	Impedance:
Head	-35.395 dB	1.0417 U	49.020Ω
Body	-25.454 dB	1.1177 U	55.435Ω

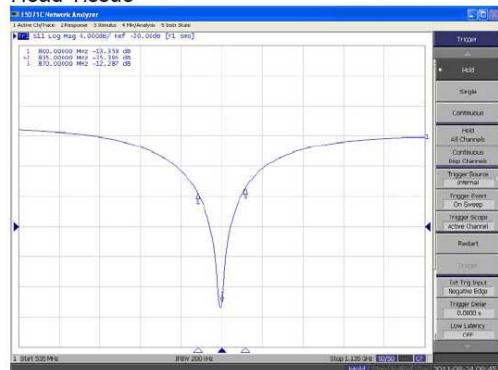
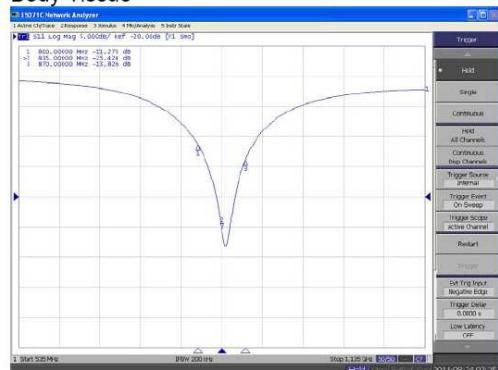
Tissue Validation

	Dielectric constant, ϵ_r	Conductivity, σ [S/m]
Head Tissue 835MHz	41.78	0.92
Body Tissue 835MHz	56.37	0.95

NCL Calibration Laboratories

Division of APREL Laboratories.

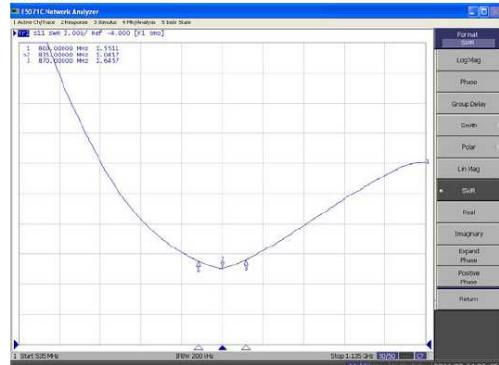
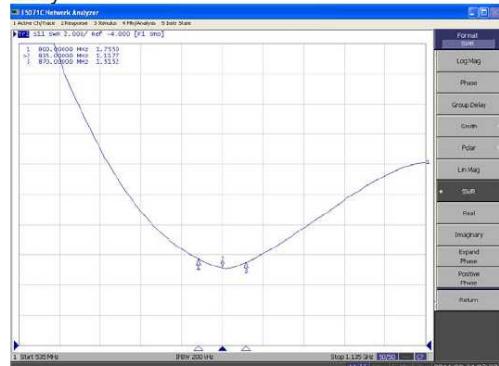
The Following Graphs are the results as displayed on the Vector Network Analyzer.

S11 Parameter Return Loss**Head Tissue****Body Tissue**

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

NCL Calibration Laboratories

Division of APREL Laboratories.

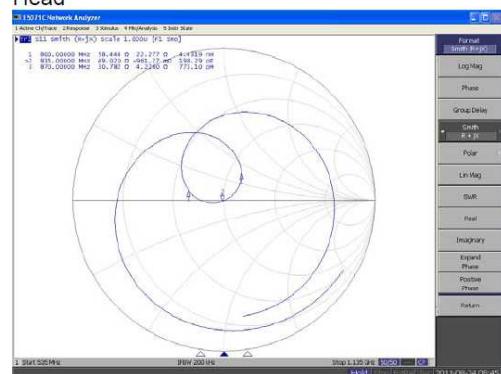
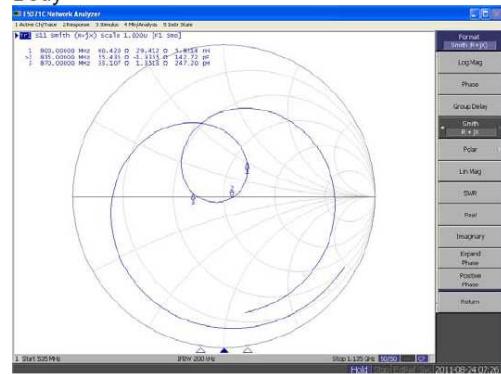
**SWR
Head****Body**

7

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

NCL Calibration Laboratories

Division of APREL Laboratories.

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

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

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 2011.

NCL CALIBRATION LABORATORIES

Calibration File No: DC-1331
Project Number: BAC-dipole –cal-5615

C E R T I F I C A T E O F C A L I B R A T I O N

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

Calibrated: 25th August, 2011
Released on: 25th August, 2011

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

Released By:

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.

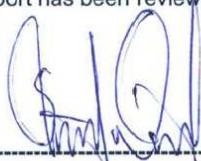
Conditions

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

We the undersigned attest that to the best of our knowledge the calibration of this device has been accurately conducted and that all information contained within this report has been reviewed for accuracy.



Stuart Nicol



C. Teodorian

Primary Measurement Standards

Instrument	Serial Number	Cal due date
Power meter Anritsu MA2408A	245025437	Nov.4, 2011
Power Sensor Anritsu MA2481D	103555	Nov 4, 2011
Attenuator HP 8495A (70dB) 1	944A10711	Aug.8, 2012
Network Analyzer Agilent E5071C	1334746J	Feb. 8, 2012
Secondary Measurement Standards		
Signal Generator Agilent E4438C	-506 MY55182336	June 7, 2012

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Calibration Results Summary

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

Mechanical Dimensions

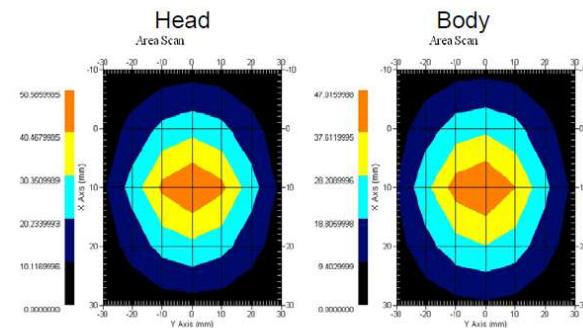
Length: 67.1 mm
Height: 38.9 mm

Electrical Specification

Tissue	Frequency	SWR:	Return Loss	Impedance
Head	1900MHz	1.0417 U	-35.395dB	49.020 Ω
Body	1900MHz	1.1177 U	-25.424dB	55.435 Ω

System Validation Results

Tissue	Frequency	1 Gram	10 Gram	Peak
Head	1900 MHz	39.648	20.311	73.365
Body	1900 MHz	39.769	20.176	75.866



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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-020 130 MHz to 26 GHz E-Field Probe Serial Number 212.

References

SSI-TP-018-ALSAS Dipole Calibration Procedure

SSI-TP-016 Tissue Calibration Procedure

IEEE 1528 "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

Conditions

Dipole 210-00710 was new taken from stock.

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.

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

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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 Type	Return Loss:	SWR:	Impedance:
Head	-29.360 dB	1.0732 U	47.869 Ω
Body	-22.799 dB	1.1566 U	48.022 Ω

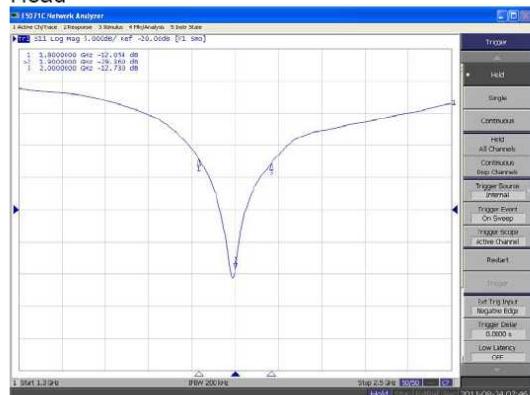
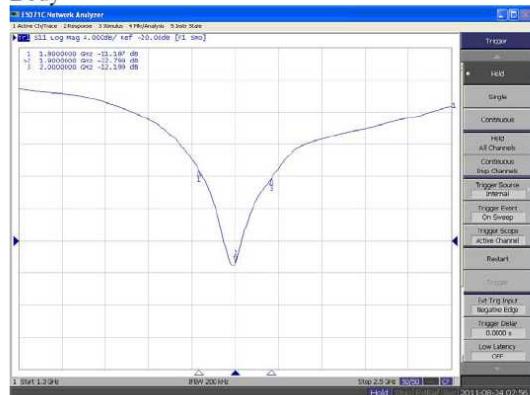
Tissue Validation

	Dielectric constant, ϵ_r	Conductivity, σ [S/m]
Head Tissue 1900MHz	38.4	1.43
Body Tissue 1900MHz	51.87	1.59

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

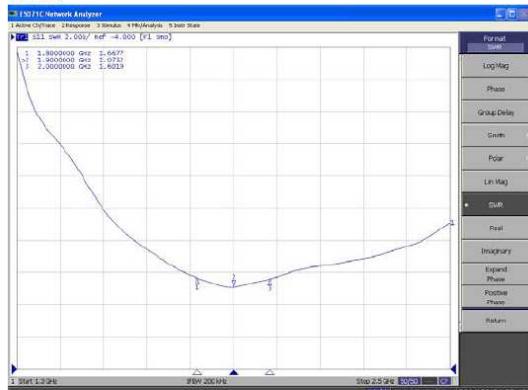
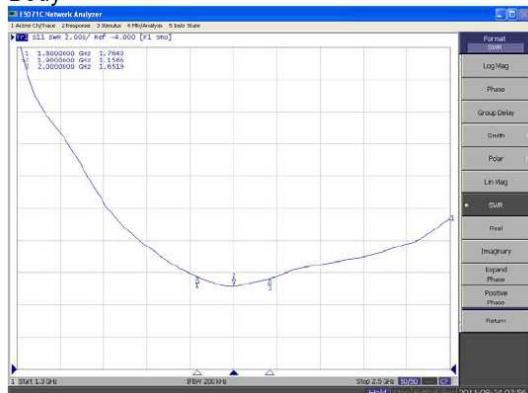
S11 Parameter Return Loss**Head****Body**

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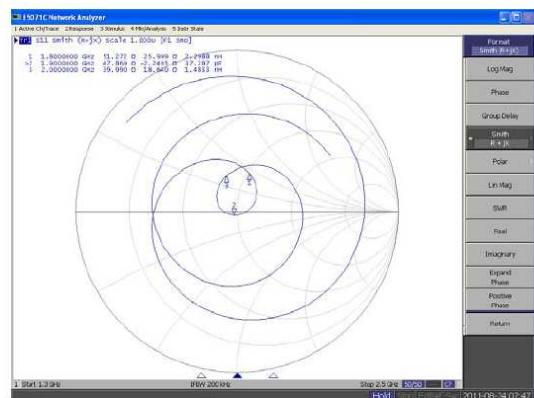
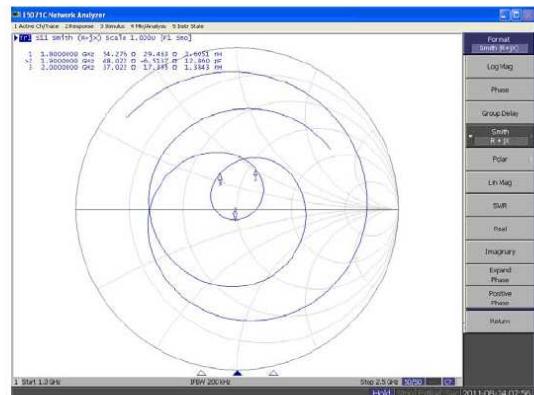
SWR**Head****Body**

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

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Test Equipment

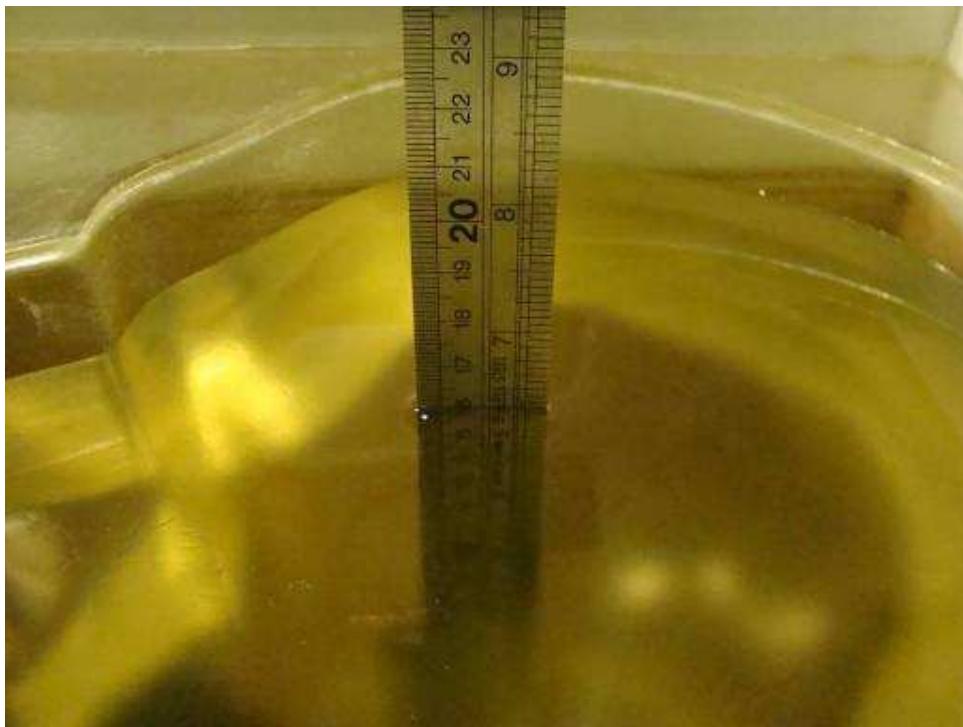
The test equipment used during Probe Calibration, manufacturer, model number and, current calibration status are listed and located on the main APREL server R:\NCL\Calibration Equipment\Instrument List 2011

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APPENDIX D EUT TEST POSITION PHOTOS

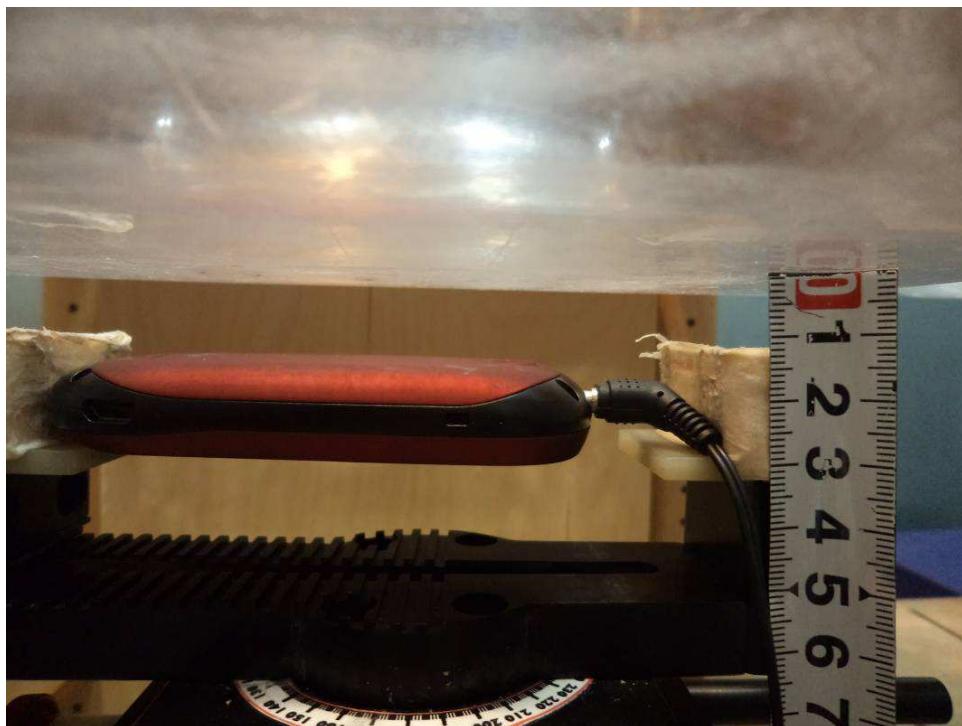
Liquid depth $\geq 15\text{cm}$



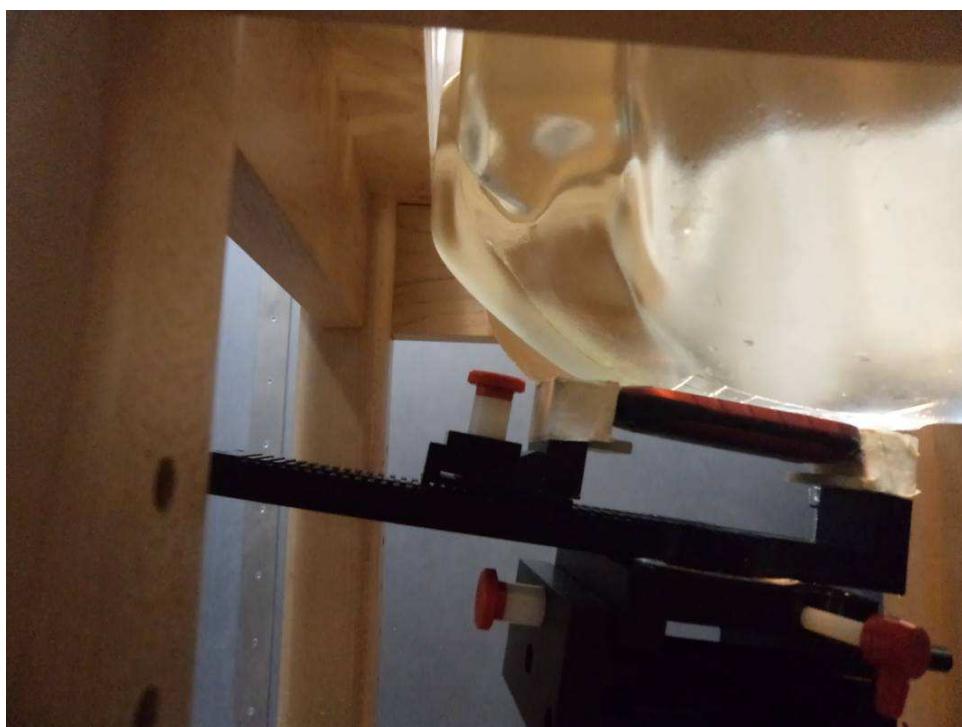
Body-worn Front-Headset Setup Photo



Body-worn Back-Headset Setup Photo



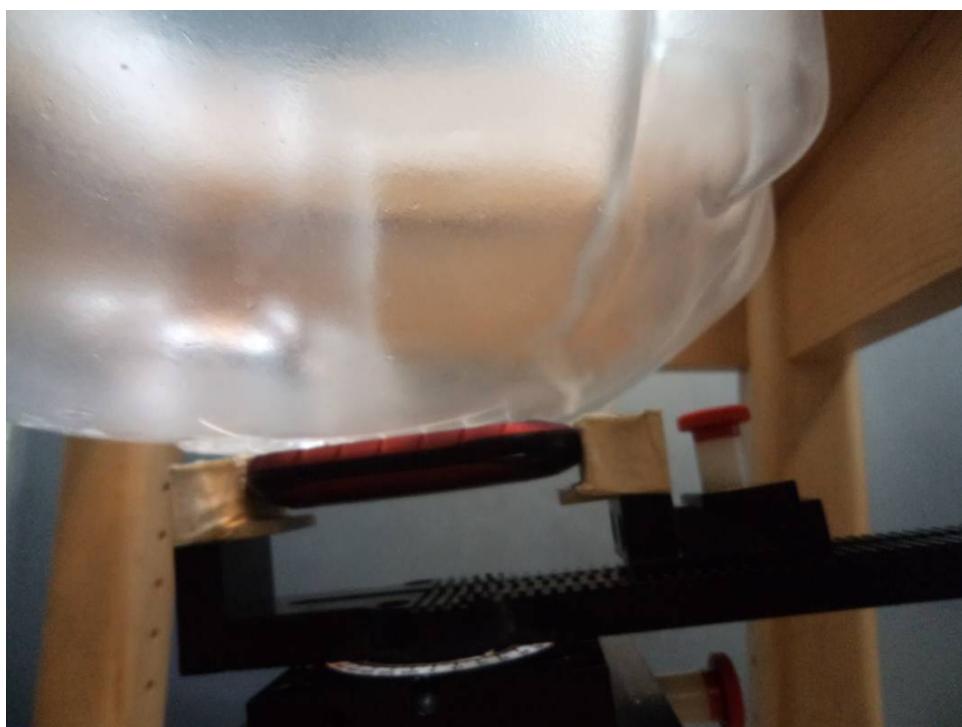
Left Head Touch Setup Photo



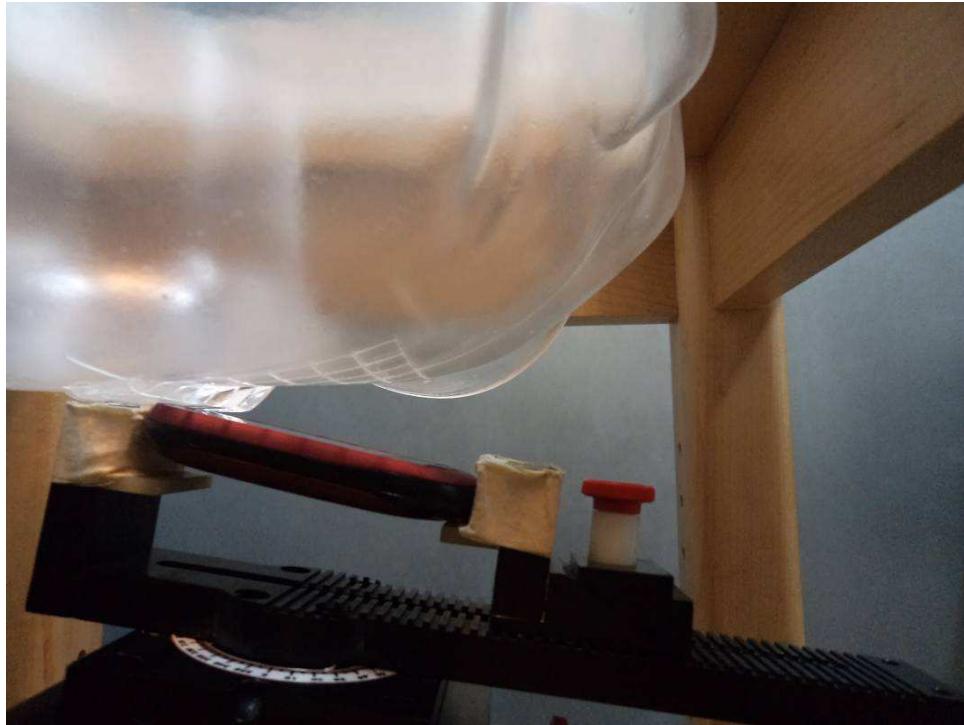
Left Head Tilt Setup Photo



Right Head Touch Setup Photo



Right Head Tilt Setup Photo



APPENDIX E EUT PHOTOS

EUT – Front View



EUT – Back View



EUT –Left View



EUT – Right View



EUT – Top View



EUT – Bottom View



EUT – Uncovered View**EUT – Headset View**

APPENDIX F INFORMATIVE REFERENCES

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- [2] David L. Means Kwok Chan, Robert F. Cleveland, \Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields", Tech. Rep., Federal Communication Commission, O_ce of Engineering & Technology, Washington, DC, 1997.
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- [15] FCC OET KDB648474 Do1 SAR Evaluation Considerations for Handsets with Multiple transmitters and Antennas.

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