



SAR Test Report

FOR:

Manufacturer: Global Trek Xploration
Model Number: GTX-GSS-01
FCC ID: 2AD9S -GTXGSS01
IC Certification Number: 20166-GTXGSS01

Test Report #: SAR_GTX Corp_001-14001_FCC-Rev2

Date of Report: June 19, 2015



A2LA Accredited

**IC Recognized #
3462B-1**

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TABLE OF CONTENTS

1. Assessment	4
2. Administrative Data	5
2.1. Identification of the Testing Laboratory Issuing the SAR Test Report	5
2.2. Identification of the Client	5
2.3. Identification of the Manufacturer	5
3. Equipment under Test (EUT)	6
3.1. General Specification of the Equipment under Test	6
3.2. Technical Specification of Supported Radios.....	7
3.3. Identification of the Equipment Under Test (EUT)	8
3.4. Identification of Accessory equipment.....	8
3.5. Maximum SAR values	8
4. Subject of Investigation	9
4.1. The IEEE Standard C95.1 , FCC Exposure Criteria, and IC Exposure Criteria	9
4.2. SAR Limit	9
5. Measurement Procedure.....	10
5.1. General Requirements.....	10
5.2. Body-worn and Other Configurations.....	10
5.3. Procedure for assessing the peak spatial-average SAR.....	11
5.4. Determination of the largest peak spatial-average SAR	12
6. The Measurement System	13
6.1. Robot system specification	13
6.2. Isotropic E-Field Probe for Dosimetric Measurements	14
6.3. Data Acquisition Electronics	14
6.4. Phantoms	14
6.5. Interpolation and Extrapolation schemes.....	14
7. Uncertainty Assessment.....	15
7.1. Measurement Uncertainty Budget According to IEEE 1528:2013	15
7.2. Measurement Uncertainty Budget According to EN 62209.....	16
8. Test results summary.....	17

8.1. Conducted Average Output Power 17

8.2. Test Positions and Configurations..... 18

8.3. SAR Results for Body 18

8.4. Dipole verification..... 18

9. References 19

10. Report History 20

- Appendices:
- Appendix A – Plots
 - Appendix B – Antenna location , Test Setup Photos
 - Appendix C – Tissue liquid parameters, Equipment list

1. Assessment

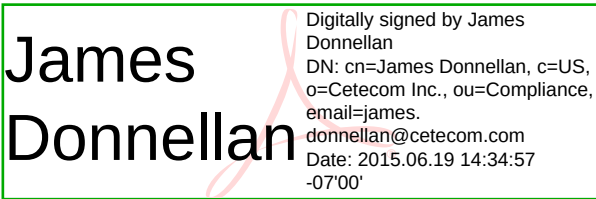
The following device was evaluated against the limits for general population uncontrolled exposure specified in FCC 2.1093 and RSS 102, Issue 5 according to measurement procedures specified in FCC regulation as listed in chapter 5, IEEE 1528:2013 and IEC 62209-2:2010 and no deviations were ascertained during the course of the tests performed.

Manufacturer	Description	Model #
Global Trek Xploration	GPS-embedded insoles with 2G/GSM/GPRS technology	GTX-GSS-01

Responsible for Testing Laboratory:

6-19-2015	Compliance	Josie Sabado (Lab Manager)	
Date	Section	Name	Signature

Responsible for the Report:

6-19-2015	Compliance	James Donellan (Sr. EMC Engineer)	
Date	Section	Name	Signature

The test results of this test report relate exclusively to the test item specified in Section 3.

CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

2. Administrative Data

2.1. Identification of the Testing Laboratory Issuing the SAR Test Report

Company Name:	CETECOM Inc.
Department:	Compliance
Address:	411 Dixon Landing Road Milpitas, CA 95035 U.S.A.
Telephone:	+1 (408) 586 6200
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Industry Canada Company Number:	3462B
Test Lab Manager:	Josie Sabado
Responsible Project Manager:	Yad Garcha

2.2. Identification of the Client

Applicant's Name:	Global Trek Xploration
Street Address:	117 W 9 th Street Suite 1219
City/Zip Code	Los Angeles, CA 90015
Country	USA
Contact Person:	Li Wang
Phone No.	+1 (213) 784-6767
e-mail:	lwang@gtxcorp.com

2.3. Identification of the Manufacturer

Same as Client.

3. Equipment under Test (EUT)

3.1. General Specification of the Equipment under Test

Model No:	GTX-GSS-01
FCC ID:	2AD9S-GTXGSS01
IC Certification Number:	20166-GTXGSS01
Product Type:	Portable
Prototype/Production:	Prototype
RF Exposure Environment:	General / Uncontrolled
Dimensions:	Footprint of device embedded in Shoe Sole Width: 37.50mm Length: 130.00mm Depth: 7.60mm
Exposure Conditions:	Body worn (Embedded in shoe)
Operating Voltage Range:	Battery (3.5V – 4.2V)
Operating Temperature Range:	-20C to +60C
Supported Radios:	GSM-850 (GPRS) band: 824-849 MHz uplink, 869-894 MHz downlink Channels: 128 to 251. Multislot Class 10. GSM-1900 band: 1850-1910 MHz uplink, 1930-1990 MHz downlink Channels: 512 to 810. Multislot Class 10. GPS receiver at 1575.42 MHz
Power Back-Off Modes:	None
Simultaneous Transmission Configurations:	None
Date of Testing:	12-09-2014 to 12-11-2014

3.2. Technical Specification of Supported Radios

Signal Type	Duty Cycle	Type(s) of Modulation	Band	Uplink Transmit Frequency Range (MHz)	Measured Maximum Conducted Output Power (dBm)
GPRS	1 uplink timeslot: 12.5% 2 uplink timeslots: 25%	GMSK	GSM 850	824.2 – 848.8	31.3
			PCS 1900	1850.2 – 1909.8	29.1

3.3. Identification of the Equipment Under Test (EUT)

EUT #	Serial Number	HW Version	SW Version
1	IMEI 356363058411150	E2a	pit3_V4.6.8

3.4. Identification of Accessory equipment

AE #	Type	Manufacturer	Model	Serial Number	Comments
1	Wireless Charging pad	GTX Corp	Q-100	45009665L	Not used during SAR evaluation
2	AC Adapter	Shenzen Topow	TPA101-08050-US	E3395623VX0	Not used during SAR evaluation

3.5. Maximum SAR values

Equipment Class	Exposure Condition	Measured 1g SAR (W/kg)	Maximum Reported 1g SAR ¹ (W/kg)
PCT	Body-Worn Accessory	0.57	1.03

Signal Type / Timeslots	Band	Exposure Condition	Measured 1g SAR (W/kg)	Maximum Scaled 1g SAR ¹ (W/kg)
GPRS / 2	GSM 850	Body Worn	0.24	0.42
GPRS / 2	GSM 1900	Body Worn	0.57	1.03

NOTES:

1. Measured 1g SAR scaled to manufacturer stated output power upper tolerance limit.

3.6. Miscellaneous Test Information

The EUT is embedded inside a custom made sole containing no metallic content. Testing was performed without the sole.

4. Subject of Investigation

The objective of the measurements done by CETECOM Inc. was the dosimetric assessment of the EUT described in section 3. The tests were performed in configurations for devices operated next to a person's body. The examinations were carried out with the dosimetric assessment system DASY52 described in Section 6.

4.1. The IEEE Standard C95.1 , FCC Exposure Criteria, and IC Exposure Criteria

The FCC limits are set by CFR 47 FCC rule parts 1.1307 and 2.1093. The IC limits are set by RSS 102, Issue 5. The limits are derived from the recommendations in IEEE C95.1-1999 (ANSI/IEEE C95.1-1999), "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz."

4.2. SAR Limit

In this report the comparison between the exposure limits and the SAR data is made using the spatial peak SAR.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and portable transmitters. The SAR values are averaged over a mass of 1g (SAR_{1g}) with the shape of a cube.

The actual exposure condition is feet/limbs; however SAR evaluation is performed against the more strict limits for partial-body/localized trunk.

Standard	Exposure Condition	Average SAR (W/kg)	Mass Average (g)
FCC CFR 47 Part 2.1093 (d)(2)	Partial-Body	1.6	1
RSS 102, Issue 5	Localized Head and Trunk	1.6	1

5. Measurement Procedure

The Federal Communications Commission (FCC) requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. The measurement procedure shall be performed according to IEEE 1528:2013. The following KDB publications have additionally been applied:

447498 D01 V05 – General RF Exposure Guidance
865664 D01V01 – SAR measurement 100 MHz to 6 GHz
941225 D03 V01 – Recommended SAR Test Reduction Procedures for GSM/GPRS/EDGE

Industry Canada (IC) requirements and measurement techniques regarding RF exposure are described in RSS-102, Issue 5, which refers to the latest version of IEEE 1528 and IEC 62209. IC follows many of the same procedures as applied for compliance with FCC requirements regarding EUT specific technologies and form factors. IC allows the use of the above listed KDBs in most aspects as described in IC Notice 2012-DRS1203 regarding Applicability of Latest FCC RF Exposure KDB Procedures (Publication Date: October 24, 2012) and Other Procedures.

5.1. General Requirements

SAR evaluation was performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature was in the range of 18°C to 25°C and 30-70% humidity. Simulating liquid temperature did not deviate more than 2°C throughout SAR evaluation.

5.2. Body-worn and Other Configurations

Test Position

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration. Devices with a headset output shall be tested with a connected headset.

Test to be Performed

For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do. For multiple accessories that do not contain metallic components, the device may be tested only with that accessory which provides the closest spacing to the body. For multiple accessories that contain metallic components, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component, only the accessory that provides the closest spacing to the body must be tested. If the manufacturer provides none body-worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall 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.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value.

5.3. Procedure for assessing the peak spatial-average SAR

Step 1: Power reference measurement:

Prior to the SAR test, a local SAR measurement should be taken at a user-selected spatial reference point to monitor power variations during testing.

Step 2: Area scan

The measurement procedures for evaluating SAR associated with wireless handsets typically start with a coarse measurement grid in order to determine the approximate location of the local peak SAR values. This is referred to as the "area scan" procedure. The SAR distribution is scanned along the inside surface of typically half of the head of the phantom but at least larger than the areas projected (normal to the phantom's surface) by the handset and antenna. An example grid is given in Figure 4. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (variation less than ± 1 mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient precision. The distance between the measurement points should enable the detection of the location of local maximum with an accuracy of better than half the linear dimension of the tissue cube after interpolation. The approximate locations of the peak SARs should be determined from area scan. Since a given amplitude local peak with steep gradients may produce lower spatial-average SAR than slightly lower amplitude peaks with less steep gradients, it is necessary to evaluate the other peaks as well. However, since the spatial gradients of local SAR peaks are a function of wavelength inside the tissue simulating liquid and incident magnetic field strength, it is not necessary to evaluate peaks that are less than -2dB of the local maximum. Two-dimensional spline algorithms [Press, et al, 1996], [Brishoual, 2001] are typically used to determine the peaks and gradients within the scanned area. If the peak is closer than one-half of the linear dimension of the 1 g or 10 g tissue cube to the scan border, the measurement area should be enlarged if possible, e.g., by tilting the probe or the phantom (see Figure 5).

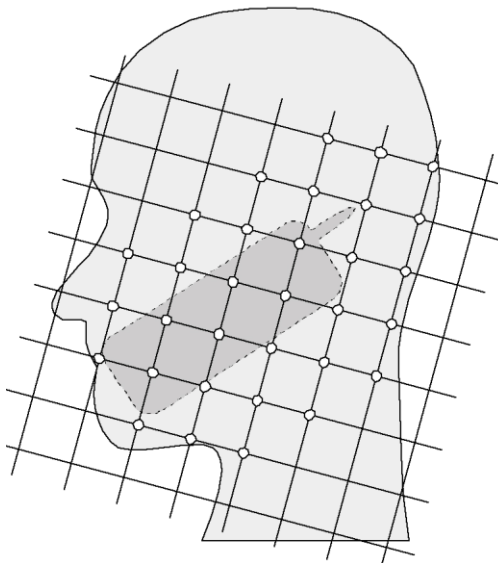


Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

The SPEAG DASY SAR system uses a mechanical sensor detection to find the phantom surface. To decrease test time, the DASY software allows the operator to choose an option where the SAR probe will reuse measurement locations from a previous identical area scan. With this option enabled, the DASY system will not use mechanical sensor detection to find the phantom surface. Locations of each measurement point of the area scan is taken at the same locations as an identical area scan if one is available. Area scans that reused location of measurement points is noted in the result plots under DASY Configuration > Sensor-Surface.

Step 3: Zoom scan

In order to assess the peak spatial SAR values averaged over a 1 g and 10 g cube, fine resolution volume scans, called "zoom scans", are performed at the peak SAR locations determined during the "area scan." The zoom scan volume should have at least 1.5 times the linear dimension of either a 1 g or a 10 g tissue cube for whichever peak spatial-average SAR is being evaluated. The peak local SAR locations that were determined in the area scan (interpolated value) should be on the centerline of the zoom scans. The centerline is the line that is normal to the surface and in the center of the volume scan. If this is not possible, the zoom scan can be shifted but not by more than half the dimension of the 1 g or a 10 g tissue cube.

The maximum spatial-average SAR is determined by a numerical analysis of the SAR values obtained in the volume of the zoom scan, whereby interpolation (between measured points) and extrapolation (between surface and closest measured points) routines should be applied. A 3-D-spline algorithm [Press, et al, 1996], [Kreyszig, 1983], [Brishoual, 2001] can be used for interpolation and a trapezoidal algorithm for the integration (averaging). Scan resolutions of larger than 2 mm can be used provided the uncertainty is evaluated according to E (see E.5).

In some areas of the phantom, such as the jaw and upper head region, the angle of the probe with respect to the line normal to the surface might become large, e.g., at angles larger than $\pm 30^\circ$ (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced ($<30^\circ$).

Step 4: Power reference measurement

The local SAR should be measured at exactly the same location as in Step 1. The absolute value of the measurement drift (the difference between the SAR measured in Step 4 and Step 1) should be recorded in the uncertainty budget. It is recommended that the drift be kept within $\pm 5\%$. If this is not possible, even with repeat testing, additional information may be used to demonstrate the power stability during the test. Power reference measurements can be taken after each zoom scan, if more than one zoom scan is needed. However, the drift should always be referred to the initial state with fully charged battery.

5.4. Determination of the largest peak spatial-average SAR

In order to determine the largest value of the peak spatial-average SAR of a handset, all device positions, configurations and operational modes should be tested for each frequency band according to steps 1 to 3 below.

Step 1: The tests of 6.4 should be conducted at the channel that is closest to the center of the transmit frequency band (f_c) for:

- a) all device positions (cheek and tilt, for both left and right sides of the SAM phantom,
- b) all configurations for each device position in (a), e.g. antenna extended and retracted, and
- c) all operational modes for each device position in (a) and configuration in (b) in each frequency band, e.g. analog and digital.

If more than three frequencies need to be tested, (i.e., $N_c > 3$), then all frequencies, configurations and modes must be tested for all of the above positions.

Step 2: For the condition providing highest spatial peak SAR determined in Step 1 conduct all tests of 6.4 at all other test frequencies, e.g. lowest and highest frequencies. In addition, for all other conditions (device position, configuration and operational mode) where the spatial peak SAR value determined in Step 1 is within 3dB of the applicable SAR limit, it is recommended that all other test frequencies should be tested as well.

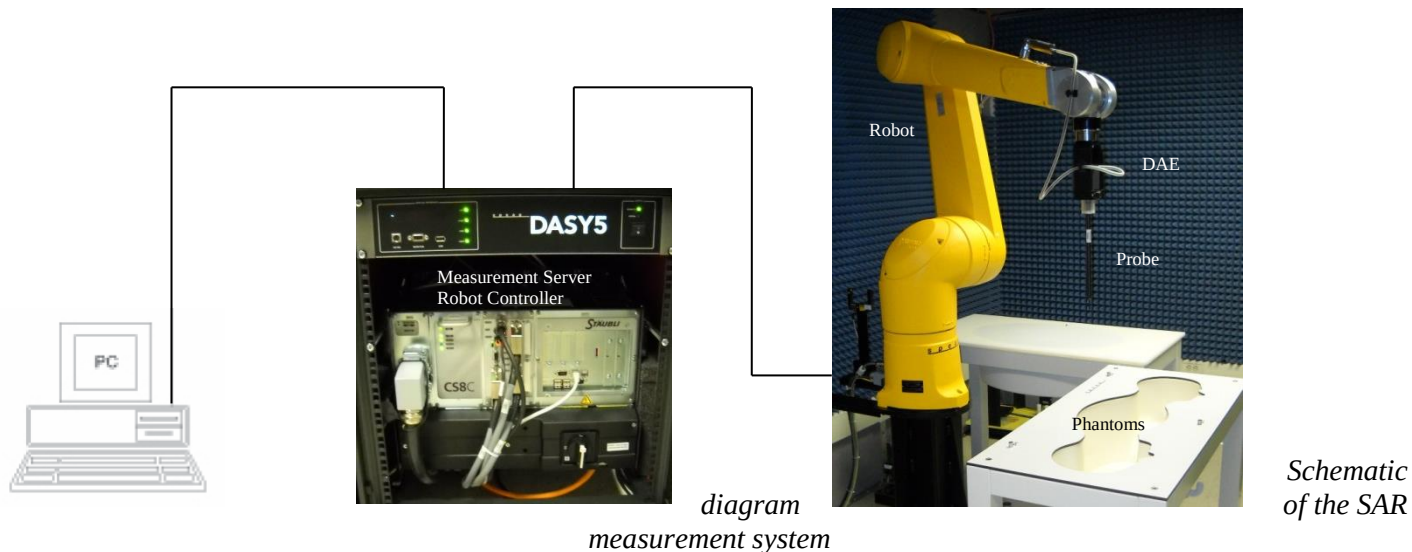
Step 3: Examine all data to determine the largest value of the peak spatial-average SAR found in Steps 1 to 2.

6. The Measurement System

6.1. Robot system specification

The SAR measurement system being used is the SPEAG DASY52 system, which consists of a Stäubli TX90XL 6-axis robot arm and CS8c controller, SPEAG SAR Probe, Data Acquisition Electronics, and SAM Twin Phantom. The robot is used to articulate the probe to programmed positions inside the phantom to obtain the SAR readings from the EUT.

The system is controlled remotely from a PC, which contains the software to control the robot and data acquisition equipment. The software also displays the data obtained from test scans.



In operation, the system first does an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom. When the maximum SAR point has been found, the system will then carry out a 3D scan centered at that point to determine volume averaged SAR level.

6.2. Isotropic E-Field Probe for Dosimetric Measurements

The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in the probe's calibration certificate.

6.3. Data Acquisition Electronics

The DAE contains a signal amplifier, multiplexer, 16bit A/D converter and control logic. It uses an optical link for communication with the DASY5 system. The DAE has a dynamic range of -100 to 300 mV. It also contains a two step probe touch detector for mechanical surface detection and emergency robot stop.

6.4. Phantoms

The Twin SAM V4.0 Phantom is designed to specifications defined in IEEE 1528 and IEC/EN 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. The material shell thickness is 2mm +/- 0.2 mm at the flat section and 6mm +/- 0.2 mm at the ear reference point. The relative permativity is 3.5 +/- 0.5 and the loss tangent is ≤ 0.05 for frequencies ≤ 6 GHz.

Additionally, the Oval Flat ELI V4.0 Phantom is designed to specification defined in IEEE 1528 and IEC/EN 62209-2. It enables the dosimetric evaluation of body mounted usage. The material thickness is 2mm +/- 0.2 mm. For frequencies ≤ 6 GHz, the relative permativity is 4 +/- 1 and the loss tangent is ≤ 0.05 . The bottom plate is 600 x 400 mm elliptical shape with a depth of 190 mm.

6.5. Interpolation and Extrapolation schemes

The interpolation, extrapolation and maximum search routines are all based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation. The routines construct a once-continuously differentiable function that interpolates the measurement values.

7. Uncertainty Assessment

The following uncertainty budgets are for Industry Canada certification.

7.1. Measurement Uncertainty Budget According to IEEE 1528:2013

The uncertainty values for components specified were evaluated according to the procedures of *IEEE 1528-2013*, *NIST 1297 1994 edition* and *ISO Guide to the Expression of Uncertainty in Measurements (GUM)*.

<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e = f(d,k)</i>	<i>f</i>	<i>g = c x f / e</i>	<i>k</i>
Uncertainty Component	Sec.	Tol. (± %)	Prob. Dist.	Div.	<i>c_i</i> (1-g)	1-g <i>u_i</i> (±%)	<i>v_i</i>
Measurement System							
Probe Calibration	E2.1	5.5	N	1	1	5.5	∞
Axial Isotropy	E2.2	4.7	R	√3	0.7	1.9	∞
Hemispherical Isotropy	E2.2	9.6	R	√3	0.7	3.9	∞
Boundary Effect	E2.3	1.0	R	√3	1	0.6	∞
Linearity	E2.4	4.7	R	√3	1	2.7	∞
System Detection Limits	E2.5	1.0	R	√3	1	0.6	∞
Readout Electronics	E2.6	0.3	N	1	1	0.3	∞
Response Time	E2.7	0.8	R	√3	1	0.5	∞
Integration Time	E2.8	2.6	R	√3	1	1.5	∞
RF Ambient Noise	E6.1	3.0	R	√3	1	1.7	∞
RF Ambient Reflections	E6.1	3.0	R	√3	1	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.4	R	√3	1	0.2	∞
Probe Positioning with respect to Phantom Shell	E6.3	2.9	R	√3	1	1.7	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	1.0	R	√3	1	0.6	∞
Test sample Related							
Test Sample Positioning	E4.2	2.9	N	1	1	2.9	145
Device Holder Uncertainty	E4.1	3.6	N	1	1	3.6	5
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	√3	1	2.9	∞
Phantom and Tissue Parameters							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	4.0	R	√3	1	2.3	∞
Liquid Conductivity Target - tolerance	E3.2	5.0	R	√3	0.7	1.8	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.5	N	1	0.7	1.6	∞
Liquid Permittivity Target tolerance	E3.2	5.0	R	√3	0.6	1.7	∞
Liquid Permittivity - measurement uncertainty	E3.3	2.5	N	1	0.6	1.5	∞
Combined Standard Uncertainty			RSS			± 10.7%	
Expanded Uncertainty (95% CONFIDENCE INTERVAL)			<i>k</i> = 2.00705			± 21.4%	

7.2. Measurement Uncertainty Budget According to EN 62209

A measurement uncertainty assessment has been undertaken following guidance given in IEC/EN-62209. Some of the uncertainty contributions are site-specific and, for these, CETECOM, Inc. has assessed the uncertainty contributions arising from local environmental and procedural factors. The resultant uncertainty budget, following the assessment template given IEC/EN-62209 is shown below:

<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e = f(d,k)</i>	<i>f</i>	<i>g = c x f / e</i>	<i>k</i>
Uncertainty Component	Sec.	Tol. (± %)	Prob. Dist.	Div.	<i>c_i</i> (1-g)	1-g <i>u_i</i> (±%)	<i>v_i</i>
Measurement System							
Probe Calibration	E2.1	5.5	N	1	1	5.5	∞
Axial Isotropy	E2.2	4.7	R	√3	0.7	1.9	∞
Hemispherical Isotropy	E2.2	9.6	R	√3	0.7	3.9	∞
Boundary Effect	E2.3	1.0	R	√3	1	0.6	∞
Linearity	E2.4	4.7	R	√3	1	2.7	∞
System Detection Limits	E2.5	1.0	R	√3	1	0.6	∞
Readout Electronics	E2.6	0.3	N	1	1	0.3	∞
Response Time	E2.7	0.8	R	√3	1	0.5	∞
Integration Time	E2.8	2.6	R	√3	1	1.5	∞
RF Ambient Noise	E6.1	3.0	R	√3	1	1.7	∞
RF Ambient Reflections	E6.1	3.0	R	√3	1	1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	0.4	R	√3	1	0.2	∞
Probe Positioning with respect to Phantom Shell	E6.3	2.9	R	√3	1	1.7	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	1.0	R	√3	1	0.6	∞
Test sample Related							
Test Sample Positioning	E4.2	2.9	N	1	1	2.9	145
Device Holder Uncertainty	E4.1	3.6	N	1	1	3.6	5
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	√3	1	2.9	∞
Phantom and Tissue Parameters							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	4.0	R	√3	1	2.3	∞
Liquid Conductivity Target - tolerance	E3.2	5.0	R	√3	0.43	1.2	∞
Liquid Conductivity - measurement uncertainty	E3.3	2.5	N	1	0.43	1.1	∞
Liquid Permittivity Target tolerance	E3.2	5.0	R	√3	0.49	1.4	∞
Liquid Permittivity - measurement uncertainty	E3.3	2.5	N	1	0.49	1.2	∞
Combined Standard Uncertainty			RSS			± 10.5%	
Expanded Uncertainty (95% CONFIDENCE INTERVAL)			<i>k</i> = 2.00705			± 21.0%	

8. Test results summary

8.1. Conducted Average Output Power

Measurement uncertainty for conducted measurements is ± 0.5 dB

GSM 850 Band – GPRS

Average power measured using a Rhode and Schwarz CMU 200.

Number of Uplink Timeslots		Modulation	Channel / Frequency [MHz]						Burst Average Upper Power Tolerance Limit
			128 / 824.2		190 / 836.6		251 / 848.8		
			Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	
GPRS	1	GMSK	31.3	22.3	31.2	22.2	31.1	22.1	33.5
	2		31.1	25.1	31	25	31	25	33.5

NOTES:

- Upper tolerance limit given by Manufacturer in the technical note titled Power Tune up procedure for GE865-QUAD, Rel. 3, Dated 05.01.2011.

PCS 1900 Band - GPRS

Average power measured using a Rhode and Schwarz CMU 200.

Number of Uplink Timeslots		Modulation	Channel / Frequency [MHz]						Burst Average Upper Power Tolerance Limit
			512 / 1850.2		661 / 1880		810 / 1909.8		
			Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	Measured Burst Average Power [dBm]	Calculated Time Average Power [dBm]	
GPRS	1	GMSK	28.6	19.6	28.6	19.6	29.1	20.1	31
	2		28.6	22.6	28.4	22.4	29	23	31

NOTES:

- Upper tolerance limit given by Manufacturer in the technical note titled Power Tune up procedure for GE865-QUAD, Rel. 3, Dated 05.01.2011.

8.2. Test Positions and Configurations

Exposure Condition	Distance	Position	Positioning Photo (Appendix B)
Body SAR	5 mm	Top Side	Photo 1

A 5 mm separation distance is used according to FCC KDB 447498 section 4.2.2:

Devices that are designed to operate on the body of users using lanyards and straps, or without requiring additional body-worn accessories, must be tested for SAR compliance using a conservative minimum test separation distance ≤ 5 mm to support compliance.

8.3. SAR Results for Body

Band	Operation Mode / Timeslots	Channel	Frequency (MHz)	Position	Measured SAR 1g (W/kg)	Reported Scaled SAR 1g (W/kg)	Results (Appendix A)
GSM 850	GMSK / 2	190	836.6	Top Side	0.24	0.42	Plot 1
GSM 1900	GMSK / 2	661	1880	Top Side	0.57	1.03	Plot 2

8.4. Dipole verification

Prior to formal testing at each frequency a system verification was performed in accordance with IEEE 1528 and the 1 Watt reference SAR value is taken from the SPEAG dipole calibration report. All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

Date	Liquid Type	Frequency (MHz)	CW input at dipole feed (Watts)	1g SAR (W/kg) ¹	1 Watt reference SAR value (W/kg)	Difference reference SAR value to normalized SAR	Results (Appendix A)
12/11/2014	MSL	835	1	9.75	9.30	4.8%	Plot 4
1/15/2015	MSL	1880	1	37.5	40.2	-6.7%	Plot 5

9. References

1. [IEEE 1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, Inst. of Electrical and Electronics Engineers, Inc., December 1998.
2. [IEEE 2013] IEEE Std 1528-2013: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head From Wireless Communications Devices: Measurement Techniques. Inst. of Electrical and Electronics Engineers, Inc., June 2013.
3. [NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results, Technical Note 1297 (TN1297), United States Department of Commerce Technology Administration, National Institute of Standards and Technology, September 1994.
4. [FCC 20XX] Various FCC KDB Publications,
< <http://transition.fcc.gov/oet/ea/eameasurements.html#sar> >
5. [IC 2015] RSS-102: Radio Frequency (RF) Exposure Compliance of Radio communication Apparatus (All Frequency Bands), Industry Canada, Issue 5, March 2015.
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7. EN 62209-2:2010, Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Human models, instrumentation, and procedures - Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)

10. Report History

Date	Report Name – Changes to Report	Changes to report	Report prepared by
January 19, 2015	SAR_GTX Corp_001-14001_FCC 1. First Version	Initial Release	James Donnellan
May 26, 2015	SAR_GTX Corp_001-14001_FCC-Rev1	Updated IC info and Review feedback	James Donnellan
June 19, 2015	SAR_GTX Corp_001-14001_FCC-Rev2	Updated IC RSS 102 reference and company name	James Donnellan