



SAR Evaluation Report

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

for

TrimTrac

Model: 51200-10

FCC ID: JUPTRIMTRAC1

October 26, 2004

REPORT NO: 04U3020-3
(Class II Permissive Change)

Prepared for

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Prepared by

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CERTIFICATE OF COMPLIANCE (SAR EVALUATION)**Dates of Tests:** October 26, 2004

APPLICANT:	Trimble Navigation Limited 749 North Mary Ave Sunnyvale, CA 94086, USA
MODEL NAME:	51200-10
FCC ID:	JUPTRIMTRAC1
DEVICE CATEGORY:	PORTABLE DEVICES
EXPOSURE CATEGORY:	GENERAL POPULATION/UNCONTROLLED EXPOSURE

Application Type: Class II Permissive Change**Test Sample is a:** Production unit**Tx Frequency:** 1850.2 to 1909.8 MHz**Max. SAR (1g):** 0.429 mW/g**Application Type:** Certification**FCC Rule Part(s):** 24 E

Note: This device contains GSM900 and GSM1800 functionality, which is not operational in the US. This report is only applicable to the GSM1900 PCS band.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC OET 65 Supplement C (released on 6/29/2001 see Test Report).

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Approved & Released For CCS By:

Hsin-Fu Shih (Sunny Shih)**Senior Engineer**

Revision History

<u>Rev.</u>	<u>Revisions</u>	<u>Revised By</u>
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1. EQUIPMENT UNDER TEST (EUT) DESCRIPTION

The EUT is a Tri-band GSM cellular transceiver with a GPS receiver built-in. The device is a stand-alone unit design to be placed in a high-value asset such as a vehicle or cargo-container.

The device has built in Tri-Band GSM900, DCS1800, and PCS1900 cellular antennas embedded in the only PCB used in the product.

TX Frequency: GSM1900 - 1850.2 MHz to 1909.9 MHz

Duty Cycle: 12.5%

Battery: AA Alkaline type

2. REQUIREMENTS FOR COMPLIANCE TESTING DEFINED BY THE FCC

The US Federal Communications Commission has released the report and order "Guidelines for Evaluating the Environmental Effects of RF Radiation", ET Docket No. 93-62 in August 1996 [1]. The order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g, for an uncontrolled environment and 8.0 mW/g, for an occupational/controlled environment as recommended by the ANSI/IEEE standard C95.1-1992 [6]. 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.

3. DOSIMETRIC ASSESSMENT SYSTEM

These measurements were performed with the automated near-field scanning system DASY4 from Schmid & Partner Engineering AG (SPEAG). The system is based on a high precision robot (working range greater than 0.9 m) which positions the probes with a positional repeatability of better than ± 0.02 mm. Special E- and H-field probes have been developed for measurements close to material discontinuity, the sensors of which are directly loaded with a Schottky diode and connected via highly resistive lines to the data acquisition unit. The SAR measurements were conducted with the dosimetric probe EX3DV3 SN:3531 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation. The probe has been calibrated according to the procedure with accuracy of better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure and found to be better than ± 0.25 dB. The phantom used was the SAM Twin Phantom as described in FCC supplement C, IEEE P1528 and EN50361.

3.2. SYSTEM COMPONENTS

DASY4 MEASUREMENT SERVER



The DASY4 measurement server is based on a PC/104 CPU board with a 166MHz low-power Pentium, 32MB chip disk and 64MB RAM. The necessary circuits for communication with either the DAE3 electronic box as well as the 16-bit AD-converter system for optical detection and digital I/O interface are contained on the DASY4 I/O-board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. The PC-operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with two expansion slots which are reserved for future applications. Please note that the expansion slots do not have a standardized pinout and therefore only the expansion cards provided by SPEAG can be inserted. Expansion cards from any other supplier could seriously damage the measurement server. Calibration: No calibration required.

DATA ACQUISITION ELECTRONICS (DAE) MODULE

The data acquisition electronics (DAE3) consists of a highly sensitive electrometer grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection. The input impedance of the DAE3 box is 200M Ω ; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



EX3DV3 ISOTROPIC E-FIELD PROBE FOR DOSIMETRIC MEASUREMENTS

- Construction:** Symmetrical design with triangular core Built-in shielding against static charges
PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
- Calibration:** Basic Broad Band Calibration in air: 10-2500 MHz.
Conversion Factors (CF) for HSL 900 and HSL 1800 CF-
Calibration for other liquids and frequencies upon request.
- Frequency:** 10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)
- Directivity:** ± 0.3 dB in HSL (rotation around probe axis);
 ± 0.5 dB in tissue material (rotation normal to probe axis)
- Dynamic Range:** 10 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
- Dimensions:** Overall length: 330 mm (Tip: 20 mm)
Tip diameter: 2.5 mm (Body: 12 mm)
Typical distance from probe tip to dipole centers: 1 mm
- Application:** High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better than 30%.



SAM PHANTOM (V4.0)

Construction: The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528-200X, CENELEC 50361 and IEC 62209. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points with the robot.

Shell Thickness: 2 ± 0.2 mm

Filling Volume: Approx. 25 liters

Dimensions: Height: 810mm; Length: 1000mm; Width: 500mm



DEVICE HOLDER FOR SAM TWIN PHANTOM

Construction: In combination with the Twin SAM Phantom V4.0 or Twin SAM, the Mounting Device (made from POM) enables the rotation of the mounted transmitter in spherical coordinates, whereby the rotation point is the ear opening. The devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



SYSTEM VALIDATION KITS

Construction: Symmetrical dipole with 1/4 balun Enables measurement of feedpoint impedance with NWA Matched for use near flat phantoms filled with brain simulating solutions Includes distance holder and tripod adaptor.

Frequency: 450, 900, 1800, 2450, 5800 MHz

Return loss: > 20 dB at specified validation position

Power capability: > 100 W ($f < 1\text{GHz}$); > 40 W ($f > 1\text{GHz}$)

Dimensions:

- 450V2: dipole length: 270 mm; overall height: 330 mm
- D835V2: dipole length: 161; overall height: 330
- D900V2: dipole length: 149 mm; overall height: 330 mm
- D1800V2: dipole length: 72 mm; overall height: 300 mm
- D1900V2: dipole length: 68; overall height: 300
- D2450V2: dipole length: 51.5 mm; overall height: 300 mm
- D5GHzV2: dipole length: 25.5 mm; overall height: 290 mm



4. EVALUATION PROCEDURES

DATA EVALUATION

The DASY4 post processing software (SEMCAD) automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	- Sensitivity	$Norm_i, a_{i0}, a_{i1}, a_{i2}$
	- Conversion factor	$ConvF_i$
	- Diode compression point	dcp_i
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	σ
	- Density	ρ

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

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

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

with	V_i	= Compensated signal of channel i	(i = x, y, z)
	U_i	= Input signal of channel i	(i = x, y, z)
	cf	= Crest factor of exciting field	(DASY parameter)
	dcp_i	= Diode compression point	(DASY parameter)

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

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

H-field probes:

$$H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

with	V_i	= Compensated signal of channel i	(i = x, y, z)
	$Norm_i$	= Sensor sensitivity of channel i	(i = x, y, z)
		$\mu V/(V/m)^2$ for E0field Probes	
	$ConvF$	= Sensitivity enhancement in solution	
	a_{ij}	= Sensor sensitivity factors for H-field probes	
	f	= Carrier frequency (GHz)	
	E_i	= Electric field strength of channel i in V/m	
	H_i	= Magnetic field strength of channel i in A/m	

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

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

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

with SAR = local specific absorption rate in mW/g

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

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

ρ = equivalent tissue density in g/cm³

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

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

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

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

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

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

SAR SYSTEM MEASUREMENT PROCEDURES

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

- **Power Reference Measurement**

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

- **Area Scan**

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a finer measurement around the hot spot. The sophisticated interpolation routines implemented in DASY4 software can find the maximum locations even in relatively coarse grids. This grid is anchored at the grid reference point of the selected section in the phantom. When the area scan's property sheet is brought-up, grid settings can be edited by a user. When an area scan has measured all reachable points, it computes the field maximum found in the scanned area, within a range of the global maximum. If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

- **Zoom Scan**

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default zoom scan measures 5 x 5 x 7 points within a cube whose base faces are centered around the maximum found in a preceding area scan job within the same procedure. If the preceding Area Scan job indicates more than one maximum, the number of Zoom Scans has to be enlarged accordingly. For dosimetric application, it is necessary to assess the peak spatial SAR value averaged over a volume. For this purpose, fine resolution volume scans need to be performed at the peak SAR location(s) determined during the Area Scan.

- **Power Drift measurement**

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have DASY4 software stop the measurements if this limit is exceeded.

- **Z-Scan**

The Z Scan job measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. A user can anchor the grid to the current probe location. As with any other grids, the local Z-axis of the anchor location establishes the Z-axis of the grid.

SPATIAL PEAK SAR EVALUATION

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

The DASY4 system allows evaluations that combine measured data and robot positions, such as:

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

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

Extrapolation

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

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

Boundary effect

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

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

Since the decay of the boundary effect dominates for small probes ($a \ll \lambda$), the cos-term can be omitted. Factors S_b (parameter Alpha in the DASY4 software) and a (parameter Delta in the DASY4 software) are assessed during probe calibration and used for numerical compensation of the boundary effect. Several simulations and measurements have confirmed that the compensation is valid for different field and boundary configurations.

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

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

Since all of these requirements are fulfilled in a DASY4 system, the correction of the probe boundary effect in the vicinity of the phantom surface is performed in a fully automated manner via the measurement data extraction during postprocessing.

5. MEASUREMENT UNCERTAINTY

UNCERTAINTY BUDGE ACCORDING TO IEEE P1528								
Error Description	Uncertainty Value [%]	Prob. Dist.	Div.	(c_i) 1g	(c_i) 10g	Std. Unc.(1g)	Std. Unc. (10g)	(v_i) v_{eff}
Measurement System								
Probe Calibration	±4.8	N	1	1	1	±4.8%	±4.8%	∞
Axial Isotropy	±4.7	R	$\sqrt{3}$	0.7	0.7	±1.9%	±1.9%	∞
Hemispherical Isotropy	±9.6	R	$\sqrt{3}$	0.7	0.7	±3.9%	±3.9%	∞
Boundary Effects	±1.0	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Linearity	±4.7	R	$\sqrt{3}$	1	1	±2.7%	±2.7%	∞
System Detection Limits	±1.0	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Readout Electronics	±1.0	N	$\sqrt{3}$	1	1	±1.0%	±1.0%	∞
Response Time	±0.8	R	$\sqrt{3}$	1	1	±0.5%	±0.5%	∞
Integration Time	±2.6	R	$\sqrt{3}$	1	1	±1.5%	±1.5%	∞
RF Ambient Condition	±1.59	R	$\sqrt{3}$	1	1	±0.9%	±0.9%	∞
Probe Positioner	±1.6	R	$\sqrt{3}$	1	1	±0.2%	±0.2%	∞
Probe Positioning	±2.9	R	$\sqrt{3}$	1	1	±1.7%	±1.7%	∞
Max. SAR Eval.	±1.0	R	$\sqrt{3}$	1	1	±0.6%	±0.6%	∞
Test sample Related								
Device Positioning	±1.1	N	1	1	1	±1.1%	±1.1%	145
Device Holder	±3.6	N	1	1	1	±3.6%	±3.6%	5
Power Drift	±5.0	R	$\sqrt{3}$	1	1	±2.9%	±2.9%	∞
Phantom and Setup								
Phantom Uncertainty	±4.0	R	$\sqrt{3}$	1	1	±2.3%	±2.3%	∞
Liquid Conductivity (target)	±5.0	R	$\sqrt{3}$	0.64	0.43	±1.8%	±1.2%	∞
Liquid Conductivity (meas.)	±2.5	N	1	0.64	0.43	±1.6%	±1.1%	∞
Liquid Permittivity (target)	±5.0	R	$\sqrt{3}$	0.6	0.49	±1.7%	±1.4%	∞
Liquid Permittivity (meas.)	±2.5	N	1	0.6	0.49	±1.5%	±1.2%	∞
Combined Std. Uncertainty						±9.8%	±9.6%	330
Expanded STD Uncertainty						±19.6%	±19.2%	

Table: Worst-case uncertainty for DASY4 assessed according to IEEE P1528.

The budge is valid for the frequency range 300 MHz to 3GHz and represents a worst-case analysis.

6. EXPOSURE LIMIT**(A) Limits for Occupational/Controlled Exposure (W/kg)**

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

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

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

NOTE 1: See Section 1 for discussion of exposure categories.

NOTE 2: Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

NOTE 3: At frequencies above 6.0 GHz, SAR limits are not applicable and MPE limits for power density should be applied at 5 cm or more from the transmitting device.

NOTE 4: The time averaging criteria for field strength and power density do not apply to general population SAR limit of 47 CFR §2.1093

NOTE
GENERAL POPULATION/UNCONTROLLED EXPOSURE
PARTIAL BODY LIMIT
1.6 mW/g

7. PROCEDURES USED TO ESTABLISH TEST SIGNALS

The following procedures were used to prepare the EUT for the SAR test.

The following settings were used to configure the Radio Communication Tester "R&S, model CMU 200".

GSM1900

GSM mode

Network Support: GSM only

Main Service: Circuit Switched

Power Setting: PCL: 0 (30dBm)

8. MEASUREMENT RESULTS

8.1. TEST LIQUID CONFIRMATION

SIMULATING LIQUIDS PARAMETER CHECK

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine if the dielectric parameters are within the tolerances of the specified target values. The relative permittivity and conductivity of the tissue material should be within $\pm 5\%$ of the values given in the table below

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 and extrapolated according to the head parameters specified in P1528.

Target Frequency (MHz)	Head		Body	
	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

(ϵ_r = relative permittivity, σ = conductivity and $\rho = 1000 \text{ kg/m}^3$)

TYPICAL COMPOSITION OF INGREDIENTS FOR LIQUID TISSUE PHANTOMS

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

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

Salt: 99% Pure Sodium Chloride

Sugar: 98% Pure Sucrose

Water: De-ionized, $16 \text{ M}\Omega$ resistivity

HEC: Hydroxyethyl Cellulose

DGBE: 99% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1,3,3-tetramethylbutyl)phenyl]ether

Simulating Liquid Dielectric Parameters Check Result @ Head 1900 MHz

Room Ambient Temperature = 23°C; Relative humidity = 42% Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)	e"	Relative Permittivity (ε _r):				
1900	22	15	e"	Relative Permittivity (ε _r):	40.0	40.3626	0.91	± 5
			13.9027	Conductivity (σ):	1.40	1.4695	4.96	± 5

Simulating Liquid Parameter Check Results @ 1900 MHz

Ambient temperature = 23.0 deg. C; Liquid temperature = 22.0 deg. C

October 26, 2004 09:56 AM

Frequency	e'	e"
1710000000.	41.2165	13.3705
1720000000.	41.1754	13.3943
1730000000.	41.1311	13.4105
1740000000.	41.0678	13.4447
1750000000.	41.0221	13.4745
1760000000.	40.9905	13.5147
1770000000.	40.9407	13.5534
1780000000.	40.8805	13.5677
1790000000.	40.8464	13.6218
1800000000.	40.8175	13.6324
1810000000.	40.7694	13.6644
1820000000.	40.7292	13.6824
1830000000.	40.6803	13.7089
1840000000.	40.6226	13.7291
1850000000.	40.5929	13.7622
1860000000.	40.5336	13.7899
1870000000.	40.4952	13.8197
1880000000.	40.4529	13.8460
1890000000.	40.3981	13.8745
1900000000.	40.3626	13.9027
1910000000.	40.3317	13.9130

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 e'' = 2 \pi f \epsilon_0 e''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

Simulating Liquid Dielectric Parameters Check Result @ Muscle 1900 MHz

Room Ambient Temperature = 23°C; Relative humidity = 42% Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)						
1900	22	15	ε'	Relative Permittivity (ε _r):	53.3	53.9572	1.23	± 5
			14.9750	Conductivity (σ):	1.52	1.58285	4.13	± 5

Simulating Liquid Parameter Check Results @ 1900 MHz

Ambient temperature = 23.0 deg. C; Liquid temperature = 22.0 deg. C

October 26, 2004 10:13 AM

Frequency	ε'	ε''
1710000000.	54.6210	14.3946
1720000000.	54.5865	14.4260
1730000000.	54.5626	14.4409
1740000000.	54.5200	14.4795
1750000000.	54.4766	14.5191
1760000000.	54.4396	14.5459
1770000000.	54.4169	14.5868
1780000000.	54.3636	14.6284
1790000000.	54.3447	14.6514
1800000000.	54.3233	14.6693
1810000000.	54.2743	14.7083
1820000000.	54.2510	14.7320
1830000000.	54.2037	14.7515
1840000000.	54.1646	14.7902
1850000000.	54.1394	14.8091
1860000000.	54.0834	14.8490
1870000000.	54.0601	14.8817
1880000000.	54.0226	14.9129
1890000000.	53.9881	14.9492
1900000000.	53.9572	14.9750
1910000000.	53.9332	15.0022

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 \epsilon'' = 2 \pi f \epsilon_0 \epsilon''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

8.2. SYSTEM PERFORMANCE CHECK

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

System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the SAM twin phantom filled with Head simulating liquid of the following parameters.
- The DASY4 system with an isotropic E-Field probe EX3DV3 SN 3531 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
- Special 5 x 5 x 7 fine cube was chosen for cube integration(dx=dy=7.5mm; dz=5mm).
- Distance between probe sensors and phantom surface was set to 2.5 mm.
- The dipole input power (forward power) was 250 mW $\pm$ 3%.
- The results are normalized to 1 W input power.

REFERENCE SAR VALUES

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

IEEE P1528 Recommended Reference Value

Frequency (MHz)	1 g SAR	10 g SAR	Local SAR at surface (Above feed point)	Local SAR at surface (y=2cm offset from feed point)
300	3.0	2.0	4.4	2.1
450	4.9	3.3	7.2	3.2
835	9.5	6.2	14.1	4.9
900	10.8	6.9	16.4	5.4
1450	29.0	16.0	50.2	6.5
1800	38.1	19.8	69.5	6.8
1900	39.7	20.5	72.1	6.6
2450	52.4	24.0	104.2	7.7
3000	63.8	25.7	140.2	9.5

System Performance Check Results

@ System Validation Dipole: D1900V2 SN:5d043

Date: October 26, 2004

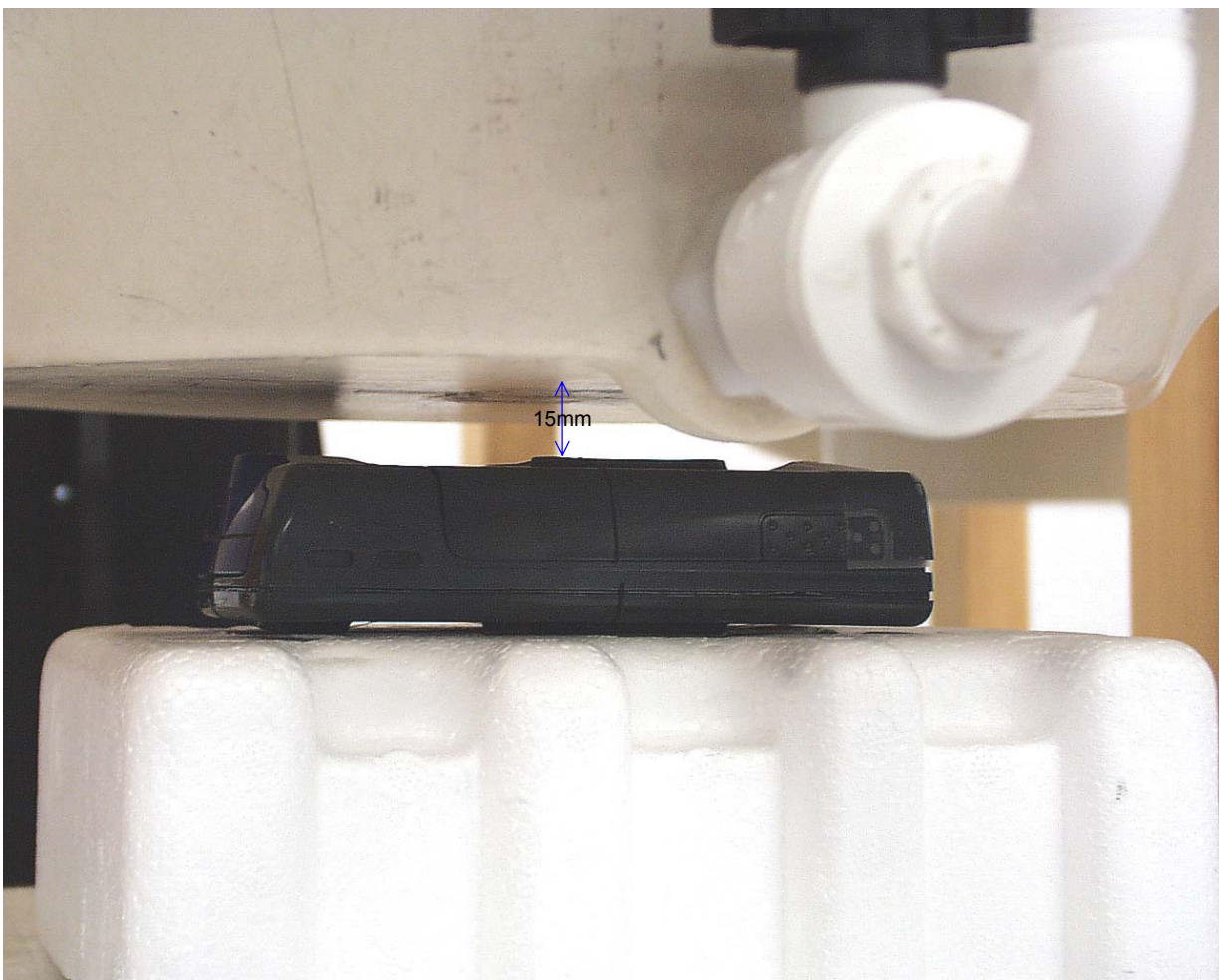
Ambient Temperature = 23°C; Relative humidity = 42%

Measured by: Sunny Shih

Head Simulating Liquid			Measured		Target _{1g}	Deviation[%]	Limit [%]
f (MHz)	Temp. [°C]	Depth [cm]	1g	Normalized to 1 W			
1900	22	15	10.2	40.8	39.7	2.77	± 10

8.3. SAR MEASUREMENTS RESULTS

Test position 1



GSM1900: Duty Cycle = 12.5% (Crest Factor: 8)

Depth of liquid: 15.0 cm

Sep. [mm]	Antenna	Channel	Frequency [MHz]	* Power Reference [V/m]		Liquid Temp [°C]	SAR_1g (mW/g)	Limit (mW/g)
				Before	After			
15	Fixed	512	1850.2					1.6
15	Fixed	661	1880.0	16.2	16.0	22	0.055	1.6
15	Fixed	810	1909.8					1.6

Notes:

1. * : SAR drift measured at same position in liquid before and after each SAR measurement.
2. The back of the EUT is parallel with the flat phantom.
3. If the SAR measured at the middle channel for this test position is at least 3 dB lower than the SAR limit, therefore, testing at the high and low channel is optional.
4. See attachment for SAR test plots

Test position 2

GSM1900: Duty Cycle = 12.5% (Crest Factor: 8)

Depth of liquid: 15.0 cm

Sep. [mm]	Antenna	Channel	Frequency [MHz]	*Power Reference [V/m]		Liquid Temp [°C]	SAR _1g (mW/g)	Limit (mW/g)
				Before	After			
15	Fixed	512	1850.2	22.0	21.8	22	0.210	1.6
15	Fixed	661	1880.0	23.9	23.9	22	0.253	1.6
15	Fixed	810	1909.8	27.0	26.9	22	0.386	1.6

Notes:

1. *: SAR drift measured at same position in liquid before and after each SAR measurement..
2. The bottom side of the EUT is parallel with the flat phantom.
3. See attachment for SAR test plots

Test position 3

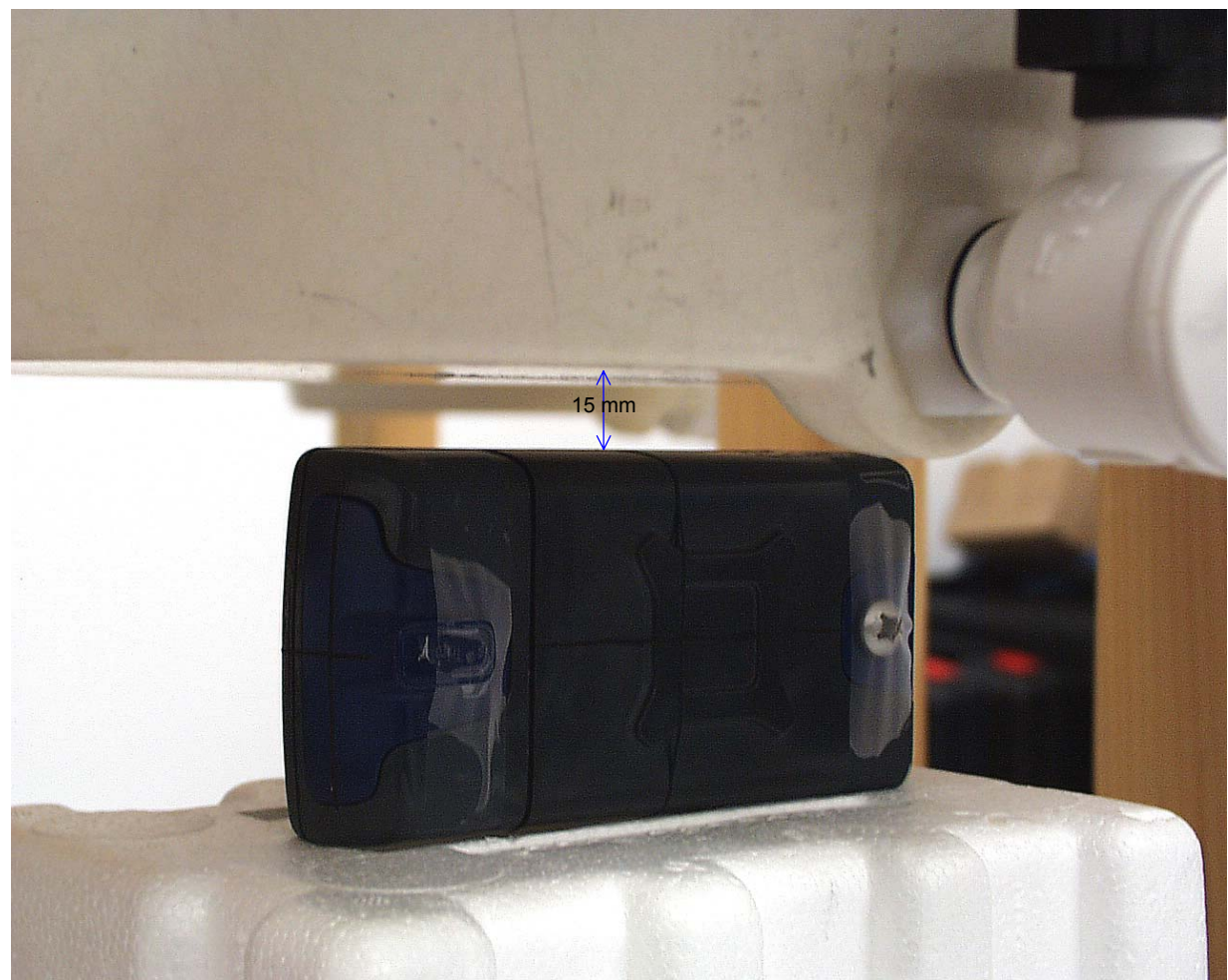
GSM1900: Duty Cycle = 12.5% (Crest Factor: 8)

Depth of liquid: 15.0 cm

Sep. [mm]	Antenna	Channel	Frequency [MHz]	*Power Reference [V/m]		Liquid Temp [°C]	SAR _{1g} (mW/g)	Limit (mW/g)
				Before	After			
15	Fixed	512	1850.2	34.1	33.9	22	0.255	1.6
15	Fixed	661	1880.0	37.2	37.0	22	0.290	1.6
15	Fixed	810	1909.8	42.7	42.5	22	0.429	1.6

Notes:

1. *: SAR drift measured at same position in liquid before and after each SAR measurement.
2. The top of the EUT is parallel with the flat phantom.
3. See attachment for SAR test plots

Test position 4

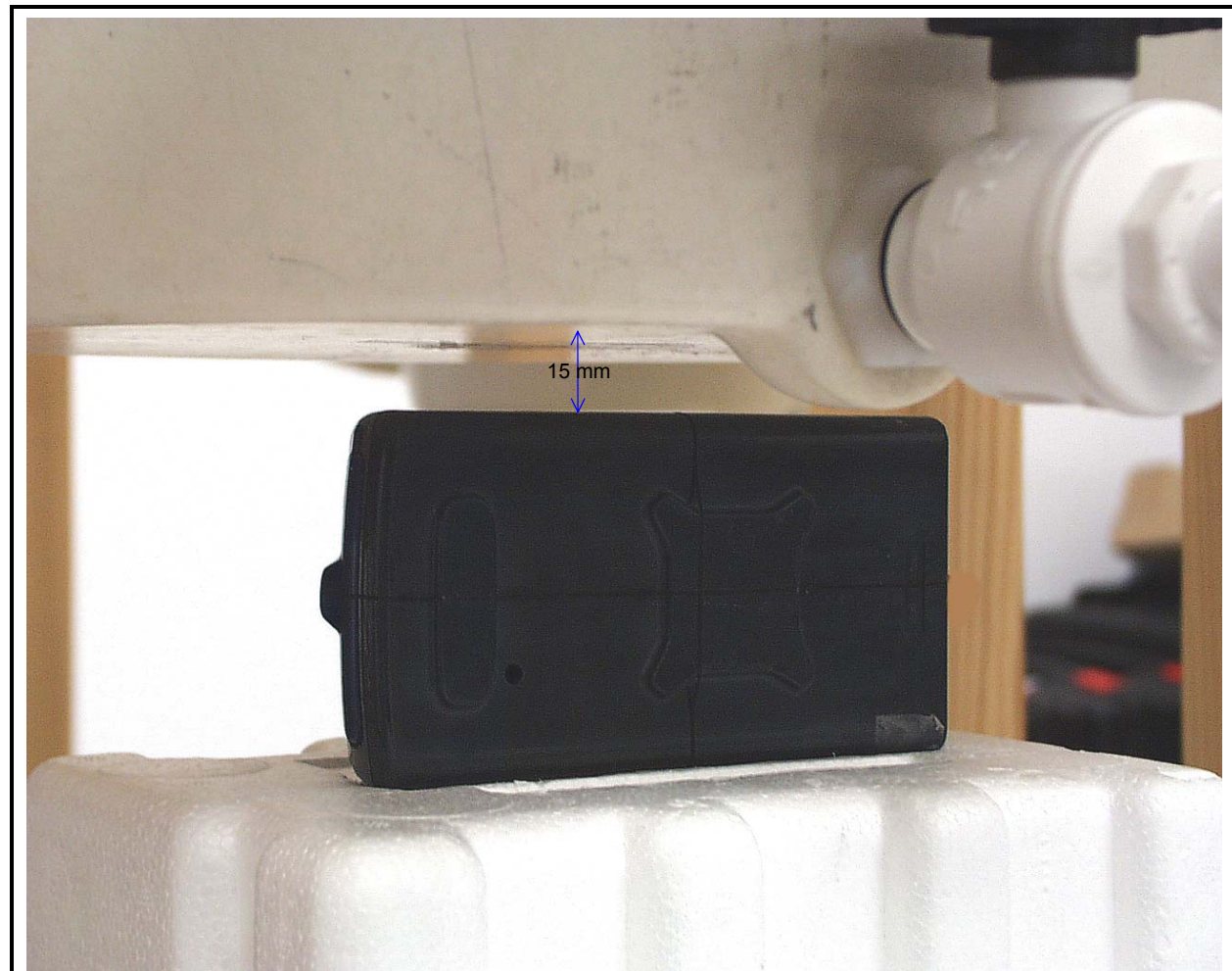
GSM1900: Duty Cycle = 12.5% (Crest Factor: 8)

Depth of liquid: 15.0 cm

Sep. [mm]	Antenna	Channel	Frequency [MHz]	*Power Reference [V/m]		Liquid Temp [°C]	SAR _{1g} (mW/g)	Limit (mW/g)
				Before	After			
15	Fixed	512	1850.2					1.6
15	Fixed	661	1880.0	10.3	10.3	22	0.021	1.6
15	Fixed	810	1909.8					1.6

Notes:

1. *: SAR drift measured at same position in liquid before and after each SAR measurement.
2. Right side of the EUT is parallel with the flat phantom.
3. If the SAR measured at the middle channel for this configuration is at least 3 dB lower than the SAR limit, therefore, testing at the high and low channels is optional.
4. See attachment for SAR test plots

Test position 5

GSM1900: Duty Cycle = 12.5% (Crest Factor: 8)

Depth of liquid: 15.0 cm

Sep. [mm]	Antenna	Channel	Frequency [MHz]	*Power Reference [V/m]		Liquid Temp [°C]	SAR _{1g} (mW/g)	Limit (mW/g)
				Before	After			
15	Fixed	512	1850.2					1.6
15	Fixed	661	1880.0	22.7	22.6	22	0.098	1.6
15	Fixed	810	1909.8					1.6

Notes:

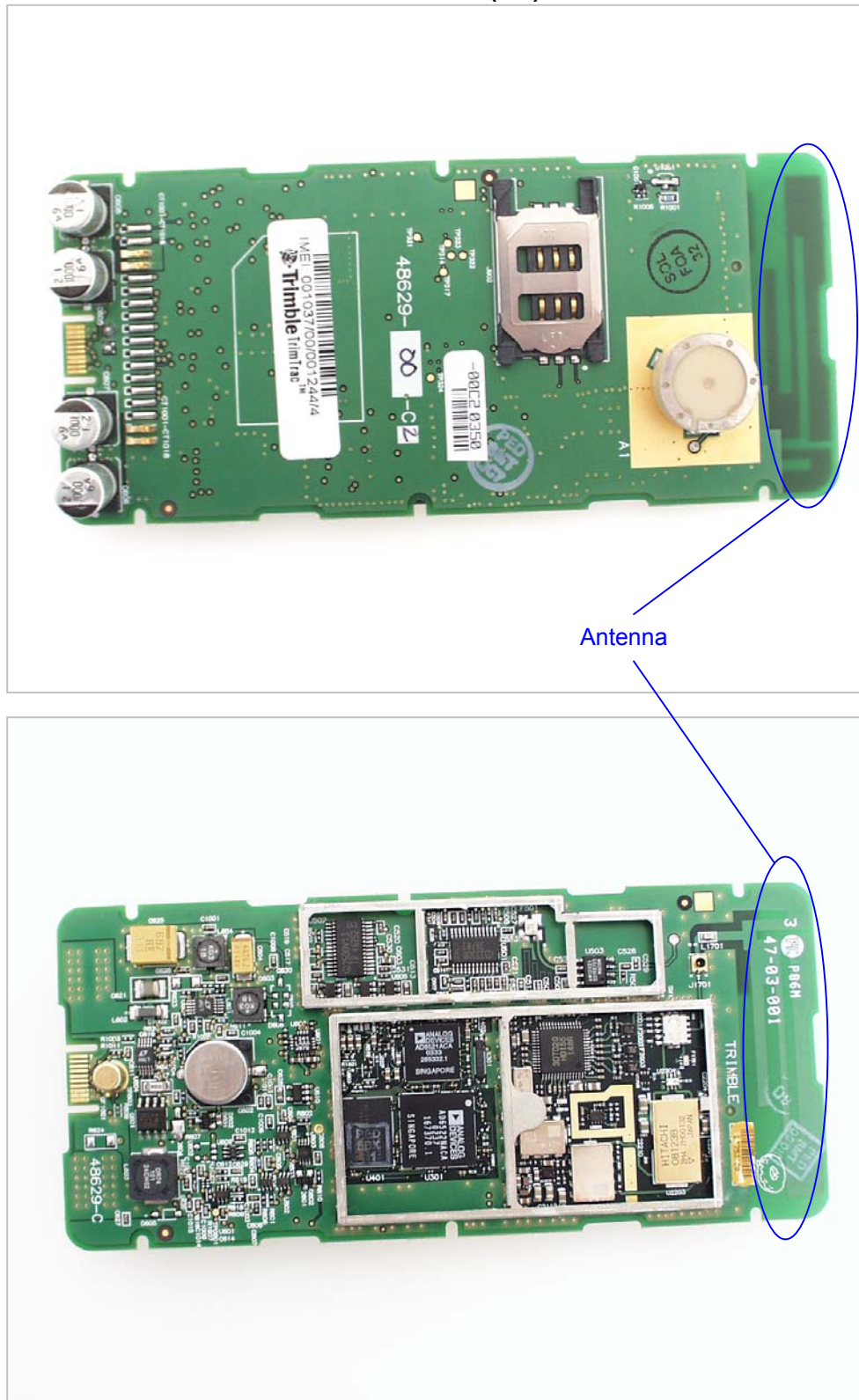
1. *: SAR drift measured at same position in liquid before and after each SAR measurement.
1. Left side of the EUT is parallel with the flat phantom.
3. If the SAR measured at the middle channel for this configuration is at least 3 dB lower than the SAR limit, therefore, testing at the high and low channels is optional.
4. See attachment for SAR test plots

9. EUT PHOTO**EUT PHOTOS (1/4)**

EUT PHOTOS (2/4)

EUT PHOTOS (3/4)

EUT PHOTOS (4/4)



10. EQUIPMENT LIST & CALIBRATION STATUS

<u>Name of Equipment</u>	<u>Manufacturer</u>	<u>Type/Model</u>	<u>Serial Number</u>	<u>Cal. Due date</u>
Robot - Six Axes	Stäubli	RX90BL	N/A	N/A
Robot Remote Control	Stäubli	CS7MB	3403-91535	N/A
DASY4 Measurement Server	SPEAG	SEUMS001BA	1041	N/A
Probe Alignment Unit	SPEAG	LB (V2)	261	N/A
S-Parameter Network Analyzer	Agilent	8753ES-6	US39173569	8/19/05
Electronic Probe kit	Hewlett Packard	85070C	N/A	N/A
E-Field Probe	SPEAG	EX3DV3	3531	7/18/05
Thermometer	ERTCO	639-1	8402	1/13/2006
SAM Phantom (SAM1)	SPEAG	TP-1185	QD000P40CA	N/A
SAM Phantom (SAM2)	SPEAG	TP-1015	N/A	N/A
Data Acquisition Electronics	SPEAG	DAE3 V1	500	12/23/04
System Validation Dipole	SPEAG	D900V2	108	3/22/06
Signal General	R&H	SMP 04	DE34210	5/5/05
Power Meter	Giga-tronics	8651A	8651404	9/16/05
Power Sensor	Giga-tronics	80701A	1834588	9/16/05
Amplifier	Mini-Circuits	ZHL-42W	D072701-5	N/A
Radio Communication Tester	Rohde & Schwarz	CMU 200	838114/032	12/1/04
Simulating Liquid	CCS	H1900	N/A	Within 24 hrs of first test
Simulating Liquid	CCS	M1900	N/A	Within 24 hrs of first test

11. ATTACHMENTS

No.	Contents	No. of page (s)
1	System Performance Check Plots	2
2	SAR Test Plots	10
3	Probe Certificate (EX3DV3-SN: 3531)	8
4	System Validation Dipole D1900V2, SN: 5d043	6

End of Report