CERTIFICATE OF COMPLIANCE
SAR EVALUATION

Test Lab:	**Applicant Information:**
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FCC ID:	**PL5GPC-2100**
Trade Name / Model:	**DotSurfer GPC-2100**
Equipment Type:	**PCS CDMA Wireless Modem Card (installed in PCMCIA Slot of Laptop PC)**
Equipment Classification:	**Licensed Base Station for Part 24 (PCB)**
Modulation:	**PCS CDMA**
Tx Frequency Range:	**1851.25 - 1908.75 MHz**
Conducted Power Tested:	**24.0 dBm (1851.25 MHz)** **24.0 dBm (1880.00 MHz)** **24.0 dBm (1908.75 MHz)**
FCC Rule Part(s):	**2.1093; ET Docket 96.326**
IC Rule Part(s):	**RSS-102 Issue 1**

This wireless mobile and/or portable device has been shown to be compliant for localized Specific Absorption Rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and has been tested in accordance with the measurement procedures specified in ANSI/IEEE Std. C95.3-1999.

I attest to the accuracy of data. All measurements 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.

Celltech Research Inc. certifies that no party to this application has been denied FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).

Shawn McMillen
General Manager
Celltech Research Inc.

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1.0 INTRODUCTION

This measurement report shows compliance of the GTRAN WIRELESS INC. PCS CDMA Modem Card FCC ID: PL5GPC-2100 (installed in PCMCIA Slot of Laptop PC) with FCC Part 2.1093, ET Docket 96-326 Rules for mobile and portable devices. The test procedures, as described in American National Standards Institute C95.1-1992 (1), FCC OET Bulletin 65, Supplement C (Edition 01-01), and RSS-102 Issue 1 of Industry Canada were employed. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the evaluation, equipment used, and the various provisions of the rules are included within this test report.

2.0 DESCRIPTION of Equipment Under Test (EUT)

EUT Type	PCS CDMA Wireless Modem Card installed in PCMCIA Slot of Laptop PC	**Trade Name(s) Model No.(s)**	DotSurfer GPC-2100
Equipment Class	Licensed Base Station for Part 24 (PCB)	**S/N No.**	Pre-production
Modulation	PCS CDMA	**RF Conducted Power Tested**	24.0 dBm (1851.25MHz) 24.0 dBm (1880.00MHz) 24.0 dBm (1908.75MHz)
FCC Rule Part(s)	2.1093; ET Docket 96.326	**Antenna Type**	Retractable (Extended Mode only)
Tx Frequency Range (MHz)	1851.25 - 1908.75	**Power Supply**	From host PC

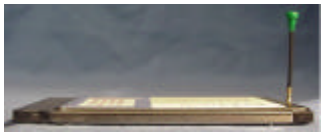
Front of EUT

Left Side of EUT

Bottom end of EUT

EUT installed in Laptop PC

Back of EUT


Right Side of EUT

Top end of EUT

EUT Close-up in PC

3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, and the SAM phantom containing brain or body equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronics (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card. The DAE3 utilizes 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 PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.

DASY3 SAR Measurement System with SAM Phantom

4.0 MEASUREMENT SUMMARY

The measurement results were obtained with the EUT tested in the conditions described in this report. Detailed measurement data and plots showing the maximum SAR location of the EUT are reported in Appendix A.

Body SAR Measurement Results

Freq. (MHz)	Channel	Mode Tested	Conducted Power (dBm)	Phantom Section	Antenna Position	Separation Distance (cm)	SAR (w/kg) 1 gram average
1851.25	0025	PCS CDMA	24.0	Flat	Extended	1.0	1.16
1880.00	0600	PCS CDMA	24.0	Flat	Extended	1.0	1.38
1908.75	1175	PCS CDMA	24.0	Flat	Extended	1.0	1.51
Mixture Type: Body Dielectric Constant: 53.3 Conductivity: 1.52			**ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure / General Population Body SAR: 1.6 W/kg (averaged over 1 gram)**				

Notes:
1. The SAR levels found were below the maximum limit of 1.6 w/kg.
2. The highest reported SAR value was 1.51 w/kg.
3. The EUT was tested for body SAR with a 1.0cm separation distance between the antenna and the outer surface of the planar phantom.
4. The EUT was tested with the antenna in the extended position, which is the only operating position of the EUT. The antenna in its retracted position is for storage use only.
5. Ambient TEMPERATURE: 22.3 °C
   Relative HUMIDITY: 56.4 %
   Atmospheric PRESSURE: 95.2 kPa

Body SAR Test Setup
1.0cm Separation Distance

5.0 DETAILS OF SAR EVALUATION

The GTRAN WIRELESS INC. PCS CDMA Modem Card FCC ID: PL5GPC-2100 (installed in PCMCIA Slot of Laptop PC) was found to be compliant for localized Specific Absorption Rate (SAR) based on the following test provisions and conditions:

1. The EUT was evaluated for body SAR installed in an IBM ThinkPad laptop PC with the antenna placed parallel to the outer surface of the planar phantom and with a 1.0 cm separation distance.
2. SAR measurements were evaluated at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimize drift.
3. The conducted power level was checked before and after each test.
4. The conducted power was measured according to the procedures described in FCC Part 2.1046.
5. The device operated continuously in the transmit mode for the duration of the test.
6. The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the device and its antenna.
7. The EUT was powered from the host PC.

6.0 EVALUATION PROCEDURES

The Specific Absorption Rate (SAR) evaluation was performed in the following manner:

a. (i) The evaluation was performed in an applicable area of the phantom depending on the type of device being tested. For devices held to the ear during normal operation, both the left and right ear positions were evaluated. The positioning of the ear-held device relative to the phantom was in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01).

(ii) For face-held and body-worn devices the planar section of the phantom was used

b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.

c. For frequencies below 500MHz a 4x4x7 matrix was performed around the greatest spatial SAR distribution found during the area scan of the applicable exposed region. For frequencies above 500MHz a 5x5x7 matrix was performed. SAR values were then calculated using a 3-D spline interpolation algorithm and averaged over spatial volumes of 1 and 10 grams.

d. If the EUT had any appreciable drift over the course of the evaluation, then the EUT was re-evaluated. Any unusual anomalies over the course of the test also warranted a re-evaluation.

7.0 SYSTEM VALIDATION

Prior to the assessment, the system was verified in the planar region of the phantom. A forward power of 250mW was applied to the 1800MHz dipole and the system was verified to a tolerance of ±10%. The applicable verification(s) is/are as follows (see Appendix B for validation test plot):

Dipole Validation Kit	Target SAR 1g (w/kg)	Measured SAR 1g (w/kg)
D1800V2	9.66	9.40

8.0 SIMULATED TISSUES

The 1800MHz body mixture consists of Glycol-monobutyl, water, and salt. The fluid was prepared according to standardized procedures, and measured for dielectric parameters (permitivity and conductivity). Prior to the evaluation the dipole validation was performed using 1800MHz brain mixture.

INGREDIENT	MIXTURE (%) 1800MHz Body	MIXTURE (%) 1800MHz Brain (Validation)
Water	69.91	54.90
Glycol Monobutyl	29.96	44.92
Salt	0.13	0.18

9.0 TISSUE PARAMETERS

The dielectric parameters of the fluids were verified prior to the SAR evaluation using an 85070C Dielectric Probe Kit and an 8753E Network Analyzer. The dielectric parameters of the fluid are as follows:

Frequency	Equivalent Tissue	Dielectric Constant e_r	Conductivity s (mho/m)	r (Kg/m^3)
1800MHz	Body	53.3 ± 5%	1.52 ± 5%	1000
1800MHz (Validation)	Brain	40.5 ± 5%	1.35 ± 5%	1000

10.0 ROBOT SYSTEM SPECIFICATIONS

Specifications

POSITIONER:	Stäubli Unimation Corp. Robot Model: RX60L
Repeatability:	0.02 mm
No. of axis:	6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor:	Pentium III
Clock Speed:	450 MHz
Operating System:	Windows NT
Data Card:	DASY3 PC-Board

Data Converter

Features:	Signal Amplifier, multiplexer, A/D converter, and control logic
Software:	DASY3 software
Connecting Lines:	Optical downlink for data and status info. Optical uplink for commands and clock

PC Interface Card

Function:	24 bit (64 MHz) DSP for real time processing Link to DAE3 16 bit A/D converter for surface detection system serial link to robot direct emergency stop output for robot

E-Field Probe

Model:	ET3DV6
Serial No.:	1590
Construction:	Triangular core fiber optic detection system
Frequency:	10 MHz to 6 GHz
Linearity:	± 0.2 dB (30 MHz to 3 GHz)

Phantom

Type:	SAM V4.0C
Shell Material:	Fiberglass
Thickness:	2.0 ± 0.1 mm
Volume:	Approx. 20 liters

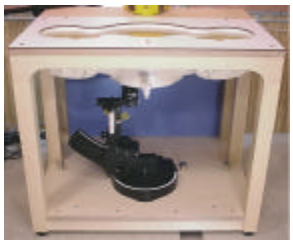
11.0 PROBE SPECIFICATION (ET3DV6)

Construction:	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g. glycol)
Calibration:	In air from 10 MHz to 2.5 GHz In brain simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy ± 8%)
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Directivity:	± 0.2 dB in brain tissue (rotation around probe axis) ± 0.4 dB in brain tissue (rotation normal to probe axis)
Dynam. Rnge:	5 μW/g to > 100 mW/g; Linearity: ± 0.2 dB
Srfce. Detect.	± 0.2 mm repeatability in air and clear liquids over diffuse reflecting surfaces
Dimensions:	Overall length: 330 mm Tip length: 16 mm Body diameter: 12 mm Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm
Application:	General dosimetry up to 3 GHz Compliance tests of mobile phone

ET3DV6 E-Field Probe

12.0 SAM PHANTOM V4.0C

The SAM phantom V4.0C is a fiberglass shell phantom with a 2.0mm shell thickness for the left and right head and flat planar area that is integrated in a wooden table. The shape of the fiberglass shell corresponds to the phantom defined by SCC34-SC2. The device holder positions are adjusted to the standard measurement positions in the three sections.


SAM Phantom V4.0C

13.0 DEVICE HOLDER

The DASY3 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°.

Device Holder

14.0 TEST EQUIPMENT LIST

SAR MEASUREMENT SYSTEM		
EQUIPMENT	***SERIAL NO.***	***CALIBRATION DATE***
DASY3 System -Robot -ET3DV6 E-Field Probe -DAE -900MHz Validation Dipole -1800MHz Validation Dipole -SAM Phantom V4.0C	 599396-01 1590 383 054 247 N/A	 N/A Mar 2001 Sept 1999 June 2001 June 2001 N/A
85070C Dielectric Probe Kit	N/A	N/A
Gigatronics 8652A Power Meter -Power Sensor 80701A -Power Sensor 80701A	1835272 1833535 1833542	Oct 1999 Oct 1999 Oct 1999
E4408B Spectrum Analyzer	US39240170	Nov 1999
8594E Spectrum Analyzer	3543A02721	Mar 2000
8753E Network Analyzer	US38433013	Nov 1999
8648D Signal Generator	3847A00611	N/A
5S1G4 Amplifier Research Power Amplifier	26235	N/A

15.0 MEASUREMENT UNCERTAINTIES

Uncertainty Description	Error	Distribution	Weight	Standard Deviation	Offset
Probe Uncertainty					
Axial isotropy	±0.2 dB	U-Shaped	0.5	±2.4 %	
Spherical isotropy	±0.4 dB	U-Shaped	0.5	±4.8 %	
Isotropy from gradient	±0.5 dB	U-Shaped	0	±	
Spatial resolution	±0.5 %	Normal	1	±0.5 %	
Linearity error	±0.2 dB	Rectangle	1	±2.7 %	
Calibration error	±3.3 %	Normal	1	±3.3 %	
SAR Evaluation Uncertainty					
Data acquisition error	±1 %	Rectangle	1	±0.6 %	
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %	
Conductivity assessment	±5 %	Rectangle	1	±5.8 %	
Spatial Peak SAR Evaluation Uncertainty					
Extrapolated boundary effect	±3 %	Normal	1	±3 %	±5 %
Probe positioning error	±0.1 mm	Normal	1	±1 %	
Integrated and cube orientation	±3 %	Normal	1	±3 %	
Cube Shape inaccuracies	±2 %	Rectangle	1	±1.2 %	
Device positioning	±6 %	Normal	1	±6 %	
Combined Uncertainties				±11.7 %	±5 %

Measurement uncertainties in SAR measurements are difficult to quantify due to several variables including biological, physiological, and environmental.

According to ANSI/IEEE C95.3, the overall uncertainties are difficult to assess and will vary with the type of meter and usage situation. However, accuracy's of ± 1 to 3 dB can be expected in practice, with greater uncertainties in near-field situations and at higher frequencies (shorter wavelengths), or areas where large reflecting objects are present. Under optimum measurement conditions, SAR measurement uncertainties of at least ± 2dB can be expected.

According to CENELEC, typical worst-case uncertainty of field measurements is ± 5 dB.
For well-defined modulation characteristics the uncertainty can be reduced to ± 3 dB.

16.0 SAR SAFETY LIMITS

EXPOSURE LIMITS (General Population / Uncontrolled Exposure Environment)	**SAR** (W/Kg)
Spatial Average (averaged over the whole body)	0.08
Spatial Peak (averaged over any 1g of tissue)	1.60
Spatial Peak (hands/wrists/feet/ankles averaged over 10g)	4.00

Notes: 1. The FCC SAR safety limits specified in the table above apply to devices operated in the General Population / Uncontrolled Exposure environment.

2. Uncontrolled environments are defined as locations where there is exposure of individuals who have no knowledge or control of their exposure.

17.0 REFERENCES

(1) ANSI, *ANSI/IEEE C95.1: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 Ghz, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992;*

(2) Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997;

(3) Thomas Schmid, Oliver Egger, and Neils Kuster, "Automated E-field scanning system for dosimetric assessments", IEEE *Transaction on Microwave Theory and Techniques,* Vol. 44, pp. 105-113, January, 1996.

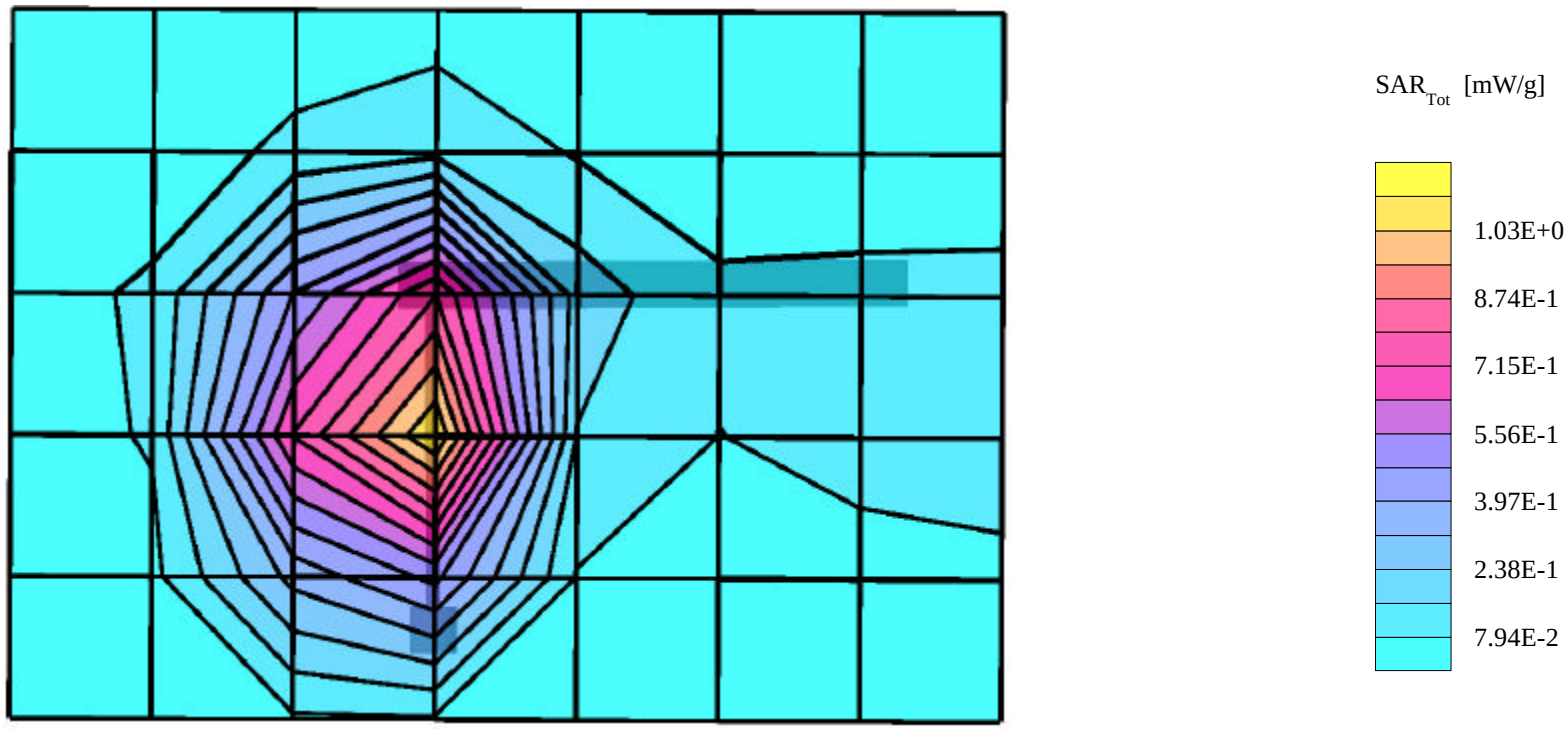
(4) Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetric evaluation of mobile communications equipment with know precision", IEICE Transactions of Communications, vol. E80-B, no. 5, pp. 645 – 652, May 1997.

APPENDIX A - SAR MEASUREMENT DATA

Gtran Wireless Inc. FCC ID: PL5GPC-2100

SAM Phantom; Flat Section; Position: (90°,305°)
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0
1800MHz Muscle: σ = 1.52 mho/m ε_r = 53.3 ρ = 1.00 g/cm^3
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Cube 5x5x7
SAR (1g): 1.16 mW/g, SAR (10g): 0.594 mW/g

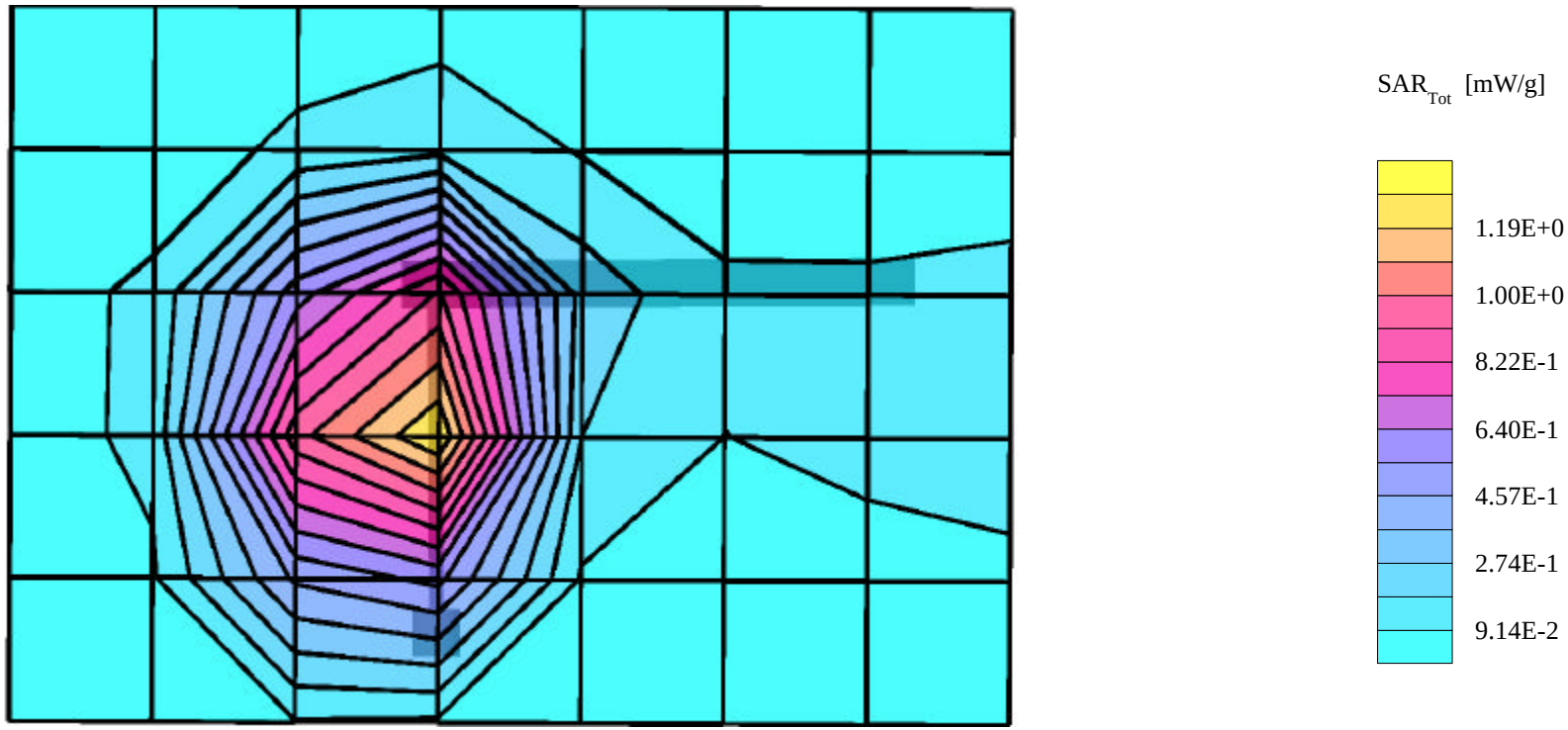
Body SAR at 1.0 cm Separation Distance
Gtran GPC-2100 PCS CDMA Modem Card
Mode: CDMA
Low Channel 25 [1851.25 MHz]
Conducted Power: 24.0 dBm
Date Tested: Sept. 20, 2001



Gtran Wireless Inc. FCC ID: PL5GPC-2100

SAM Phantom; Flat Section; Position: (90°,305°)
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0
1800MHz Muscle: σ = 1.52 mho/m ε_r = 53.3 ρ = 1.00 g/cm^3
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Cube 5x5x7
SAR (1g): 1.38 mW/g, SAR (10g): 0.699 mW/g

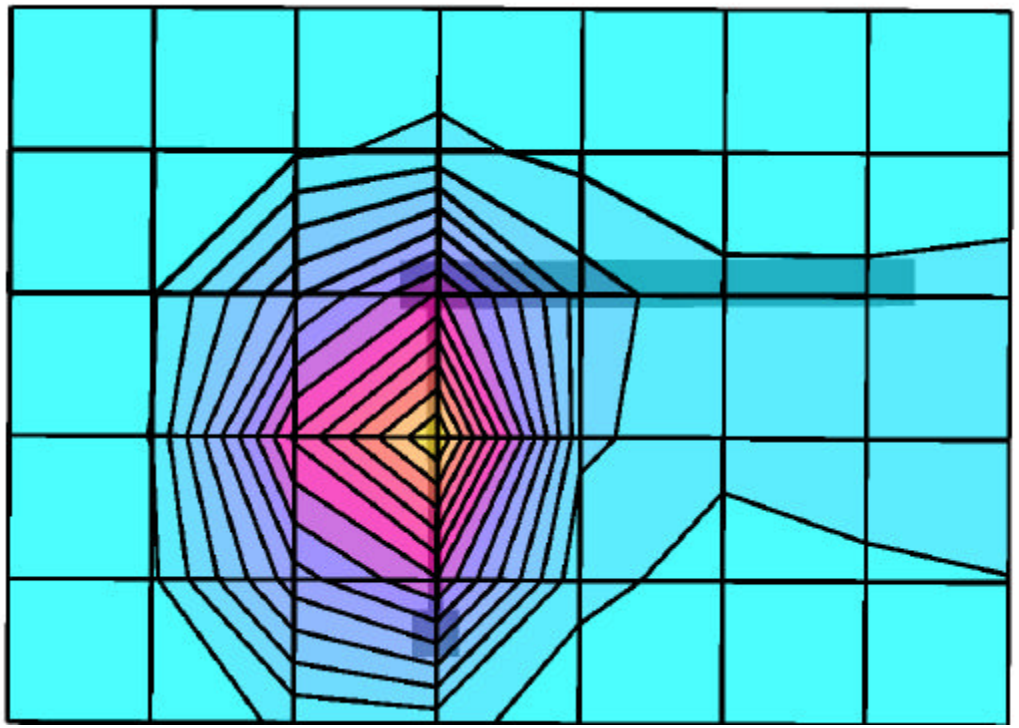
Body SAR at 1.0 cm Separation Distance
Gtran GPC-2100 PCS CDMA Modem Card
Mode: CDMA
Mid Channel 600 [1880.00 MHz]
Conducted Power: 24.0 dBm
Date Tested: Sept. 20, 2001

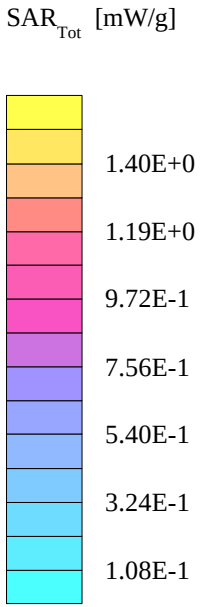


Gtran Wireless Inc. FCC ID: PL5GPC-2100

SAM Phantom; Flat Section; Position: (90°,305°)
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0
1800MHz Muscle: σ = 1.52 mho/m ε_r = 53.3 ρ = 1.00 g/cm^3
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0
Cube 5x5x7
SAR (1g): 1.51 mW/g, SAR (10g): 0.772 mW/g

Body SAR at 1.0 cm Separation Distance
Gtran GPC-2100 PCS CDMA Modem Card
Mode: CDMA
High Channel 1175 [1908.75 MHz]
Conducted Power: 24.0 dBm
Date Tested: Sept. 20, 2001

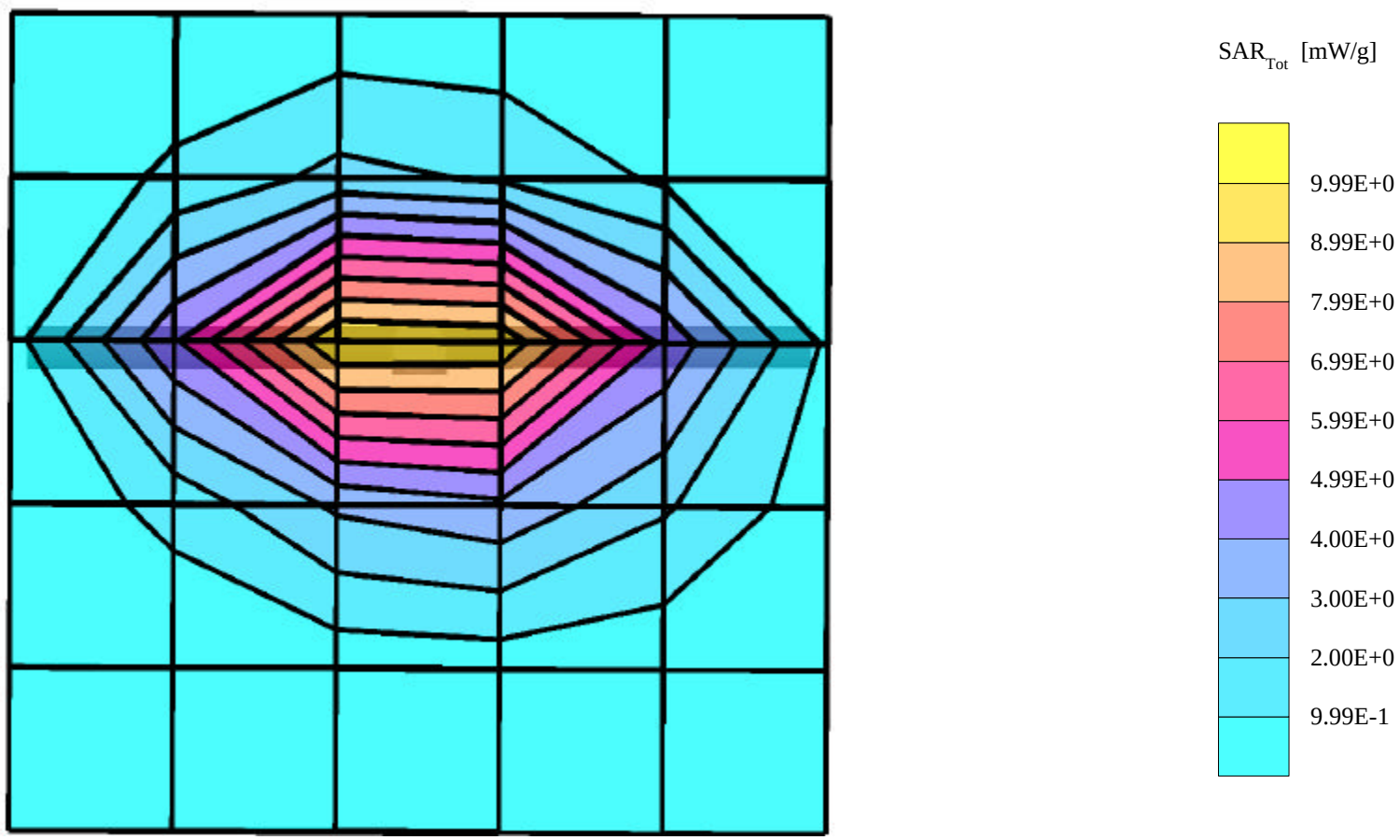




APPENDIX B - DIPOLE VALIDATION

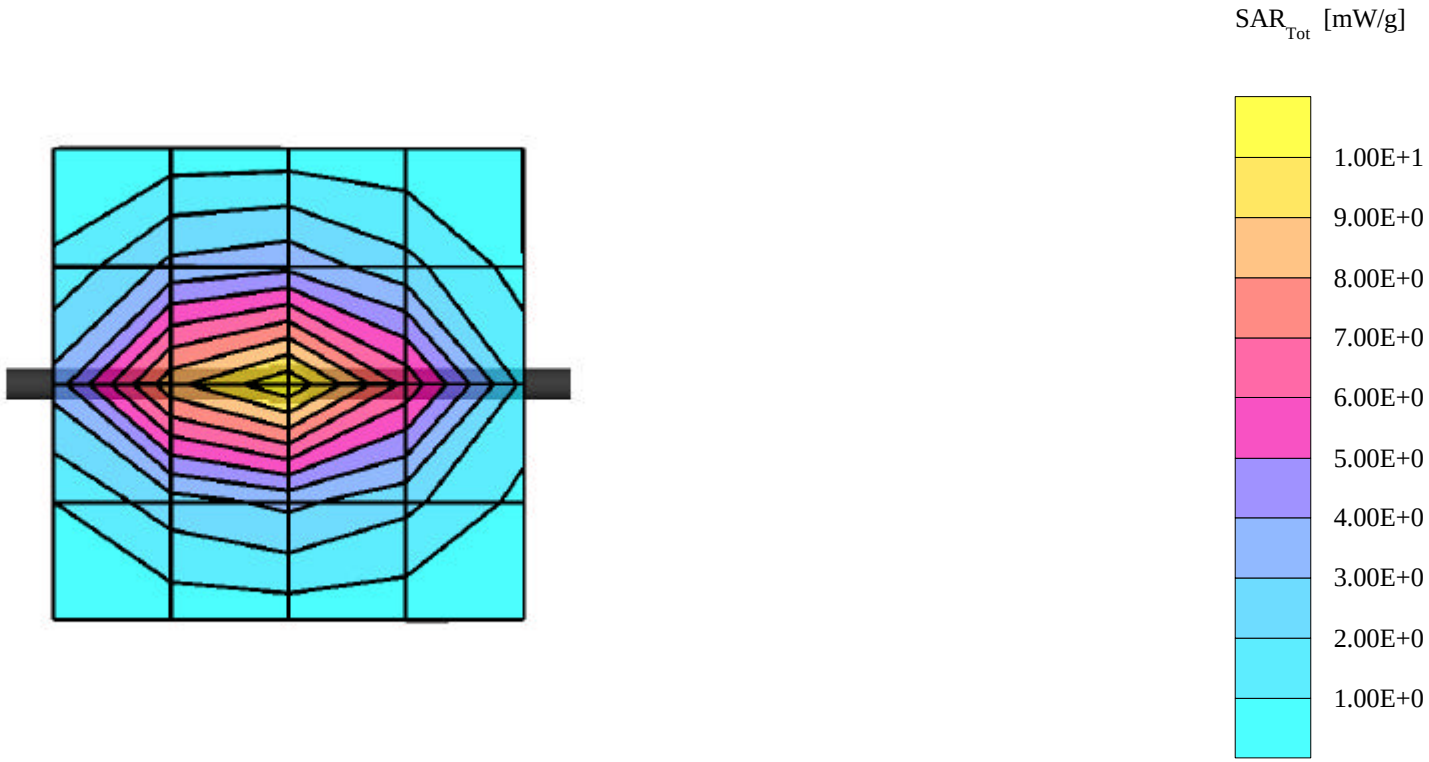
Dipole 1800 MHz

SAM Phantom; Flat Section - Validation Date: September 20, 2001
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0; 1800MHz Brain: σ = 1.36 mho/m ε_r = 40.0 ρ = 1.00 g/cm^3
Cube 5x5x7: Peak: 17.9 mW/g, SAR (1g): 9.40 mW/g, SAR (10g): 4.83 mW/g, (Worst-case extrapolation)
Penetration depth: 8.0 (7.5, 9.0) [mm]



Validation Dipole D1800V2 SN:247, d = 10 mm

Frequency: 1800 MHz; Antenna Input Power: 250 [mW]
Generic Twin Phantom; Flat Section; Grid Spacing:Dx = 15.0, Dy = 15.0, Dz = 10.0
Probe: ET3DV6 - SN1507; ConvF(5.57,5.57,5.57); Crest factor: 1.0; IEEE1528 1800 MHz : σ = 1.36 mho/m ε_r = 40.0 ρ = 1.00 g/cm^3
Cubes (2): Peak: 18.2 mW/g ± 0.04 dB, SAR (1g): 9.66 mW/g ± 0.03 dB, SAR (10g): 5.02 mW/g ± 0.03 dB, (Worst-case extrapolation)
Penetration depth: 8.2 (7.6, 9.4) [mm]
Powerdrift: -0.01 dB



APPENDIX C - PROBE CALIBRATION

Probe ET3DV6

SN:1590

Manufactured:	March 19, 2001
Calibrated:	March 26, 2001

Calibrated for System DASY3

DASY3 - Parameters of Probe: ET3DV6 SN:1590

Sensitivity in Free Space

NormX	**1.77**	$\mu V/(V/m)^2$
NormY	**1.91**	$\mu V/(V/m)^2$
NormZ	**1.67**	$\mu V/(V/m)^2$

Diode Compression

DCP X	**100**	mV
DCP Y	**100**	mV
DCP Z	**100**	mV

Sensitivity in Tissue Simulating Liquid

Head **450 MHz** e_r **= 43.5 ± 5%** s **= 0.87 ± 10% mho/m**

ConvF X	**7.36**	extrapolated	Boundary effect:	
ConvF Y	**7.36**	extrapolated	Alpha	**0.29**
ConvF Z	**7.36**	extrapolated	Depth	**2.72**

Head **900 MHz** e_r **= 42 ± 5%** s **= 0.97 ± 10% mho/m**

ConvF X	**6.83**	± 7% (k=2)	Boundary effect:	
ConvF Y	**6.83**	± 7% (k=2)	Alpha	**0.37**
ConvF Z	**6.83**	± 7% (k=2)	Depth	**2.48**

Head **1500 MHz** e_r **= 40.4 ± 5%** s **= 1.23 ± 10% mho/m**

ConvF X	**6.13**	interpolated	Boundary effect:	
ConvF Y	**6.13**	interpolated	Alpha	**0.47**
ConvF Z	**6.13**	interpolated	Depth	**2.17**

Head **1800 MHz** e_r **= 40 ± 5%** s **= 1.40 ± 10% mho/m**

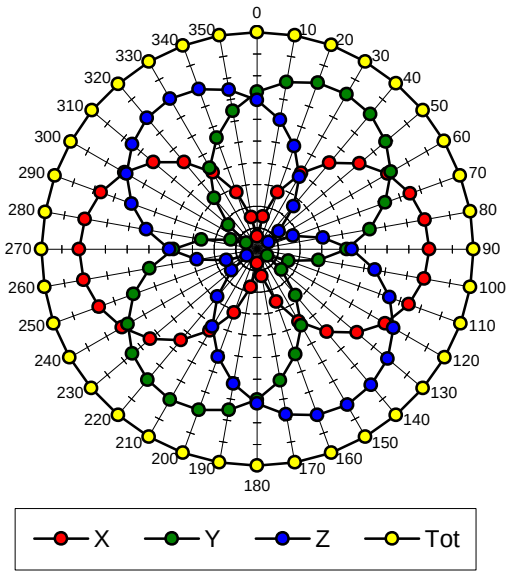
ConvF X	**5.78**	± 7% (k=2)	Boundary effect:	
ConvF Y	**5.78**	± 7% (k=2)	Alpha	**0.53**
ConvF Z	**5.78**	± 7% (k=2)	Depth	**2.01**

Sensor Offset

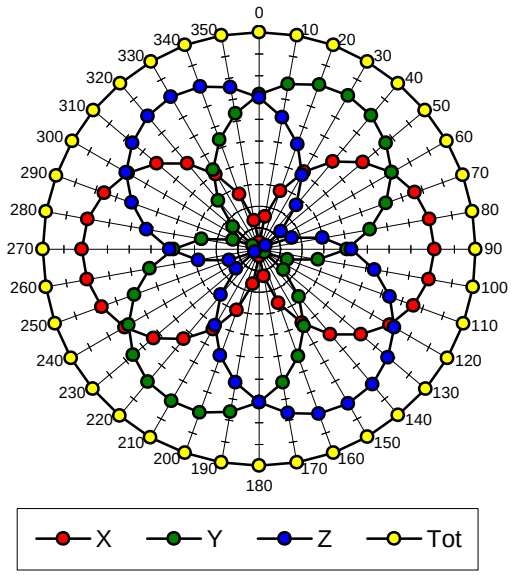
Probe Tip to Sensor Center	**2.7**	mm
Optical Surface Detection	**1.2 ± 0.2**	mm

Receiving Pattern (f) , q = 0°

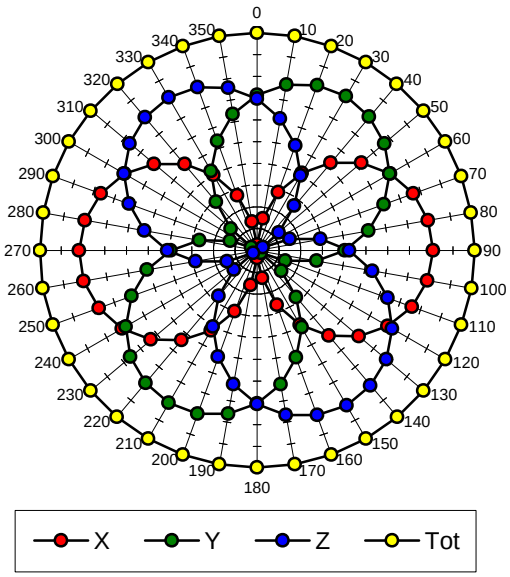
f = 30 MHz, TEM cell ifi110



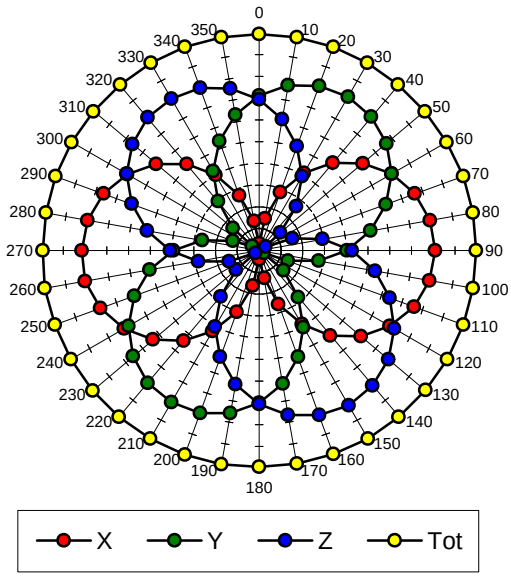
f = 100 MHz, TEM cell ifi110



f = 300 MHz, TEM cell ifi110



f = 900 MHz, TEM cell ifi110



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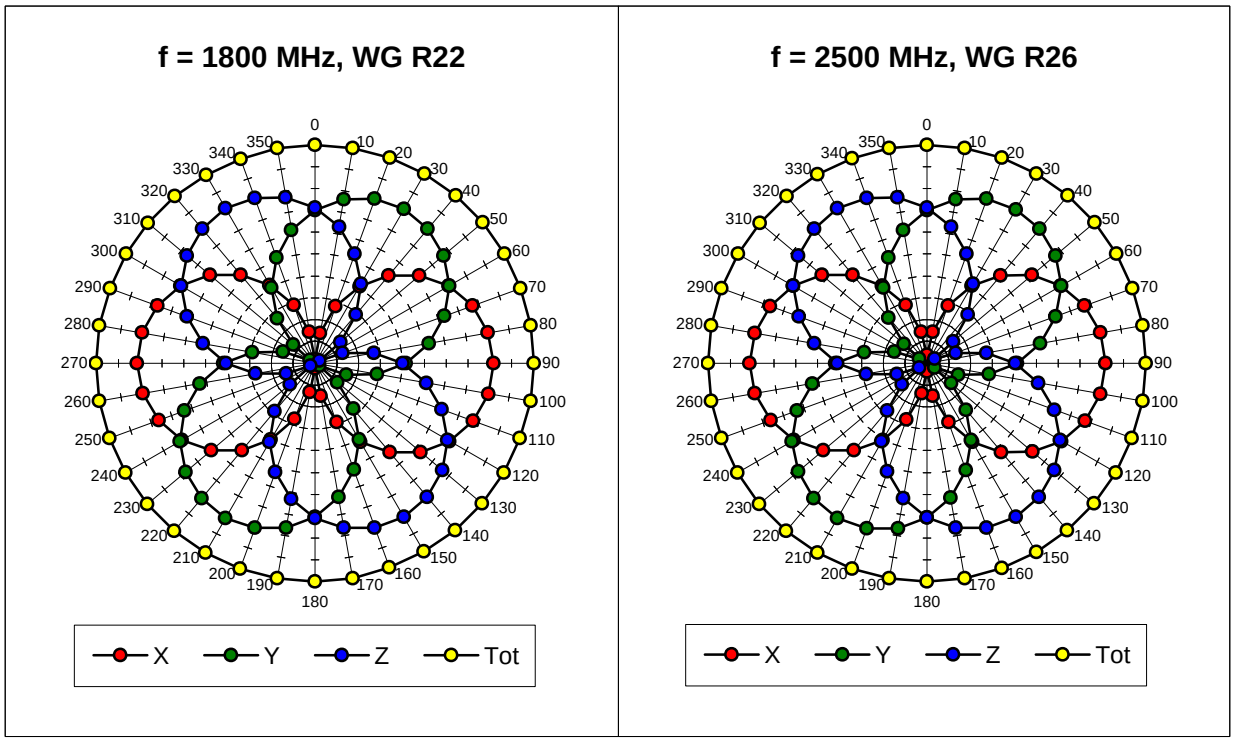
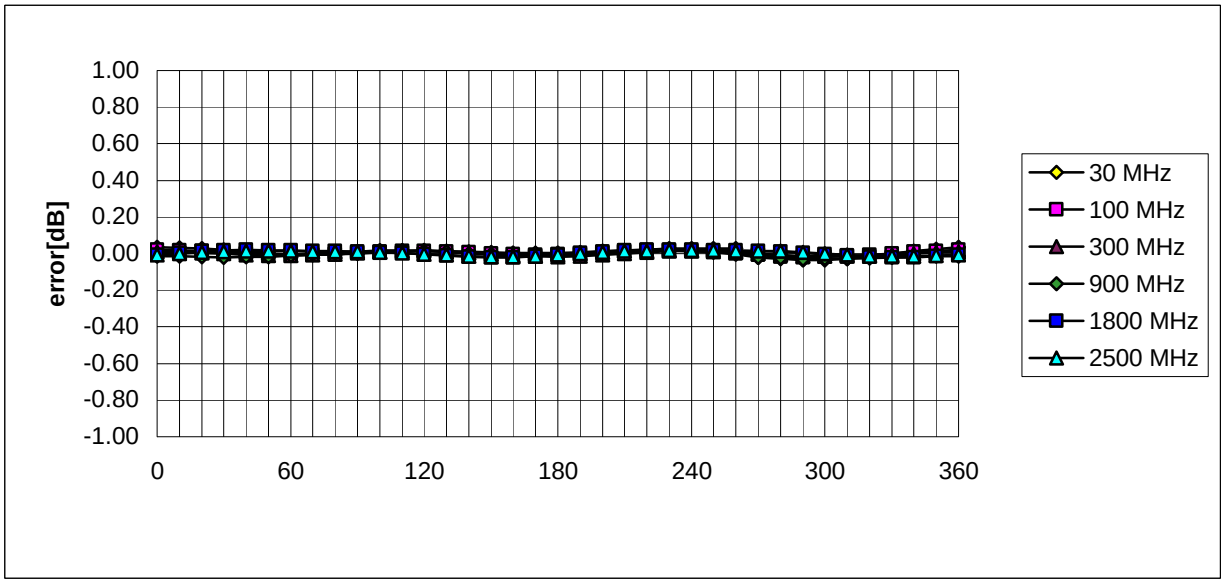
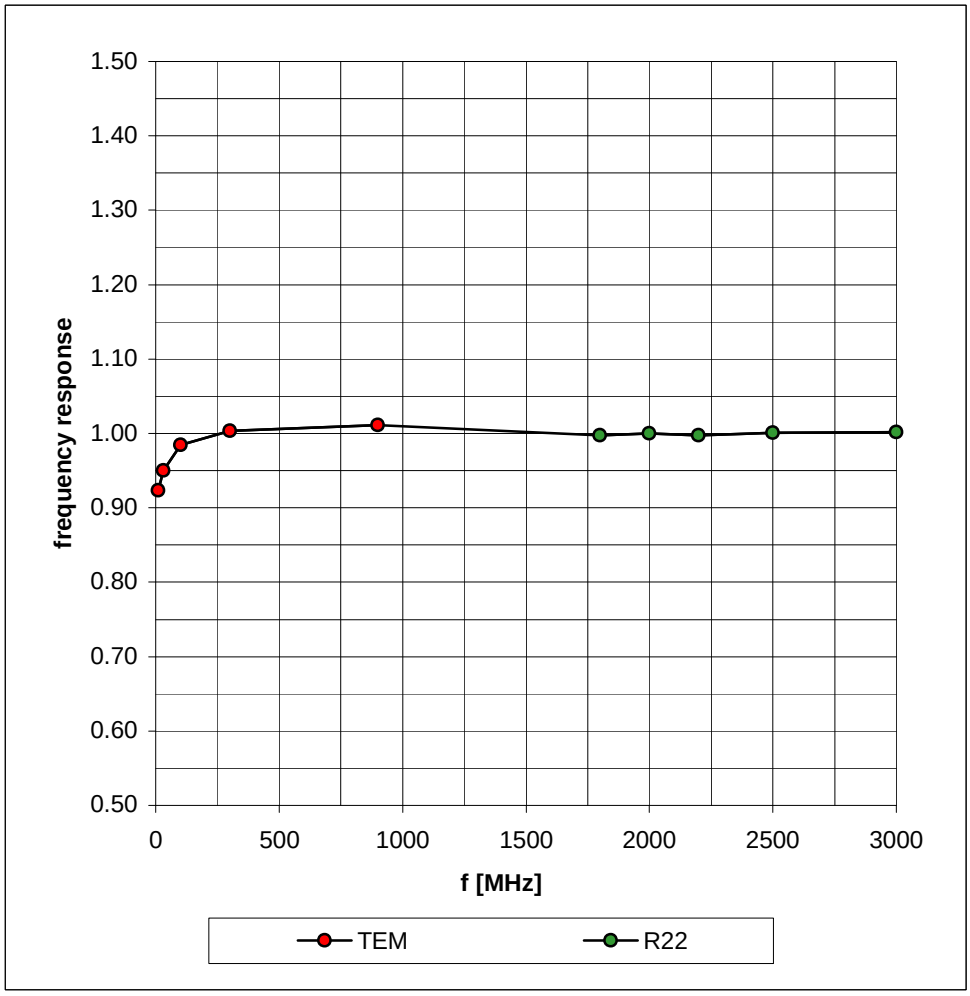


Isotropy Error (f), q = 0°



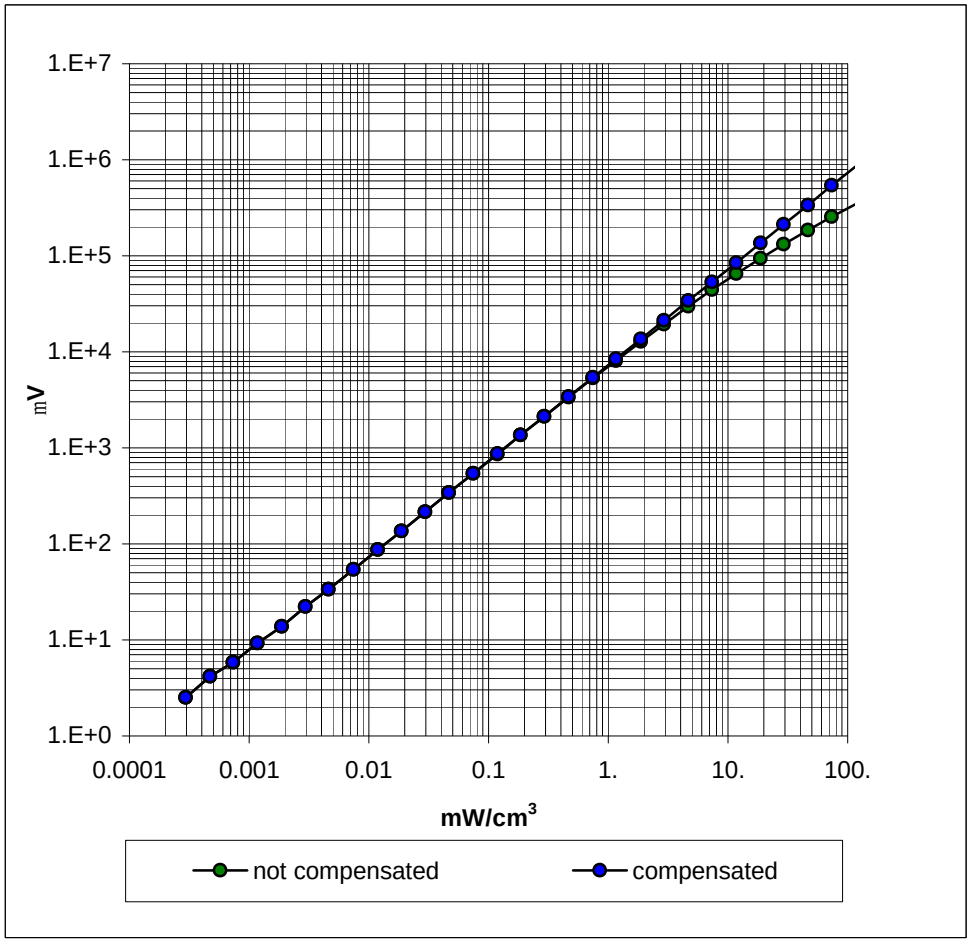
Frequency Response of E-Field

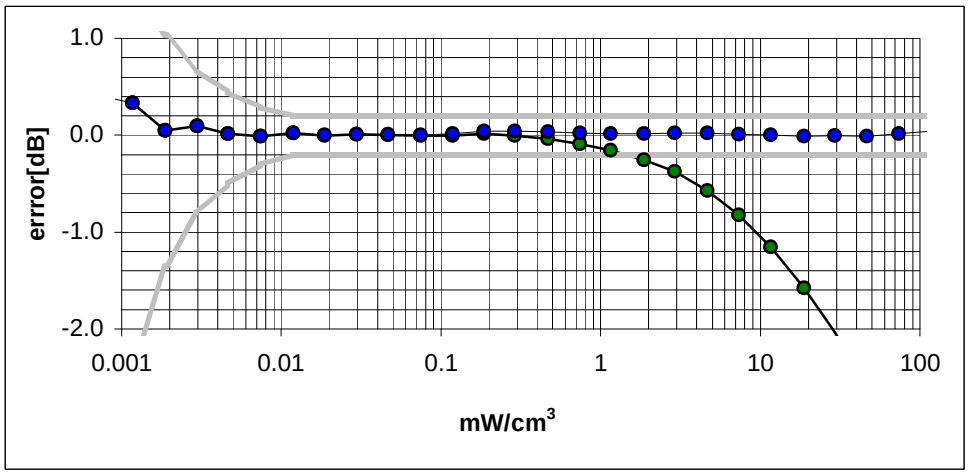
(TEM-Cell:ifi110, Waveguide R22)



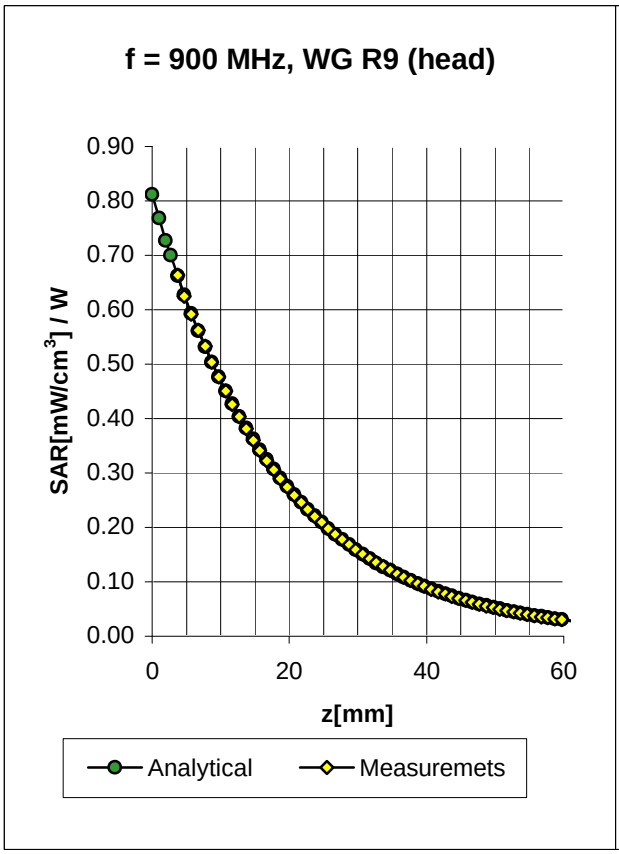
Dynamic Range f(SAR_{brain})

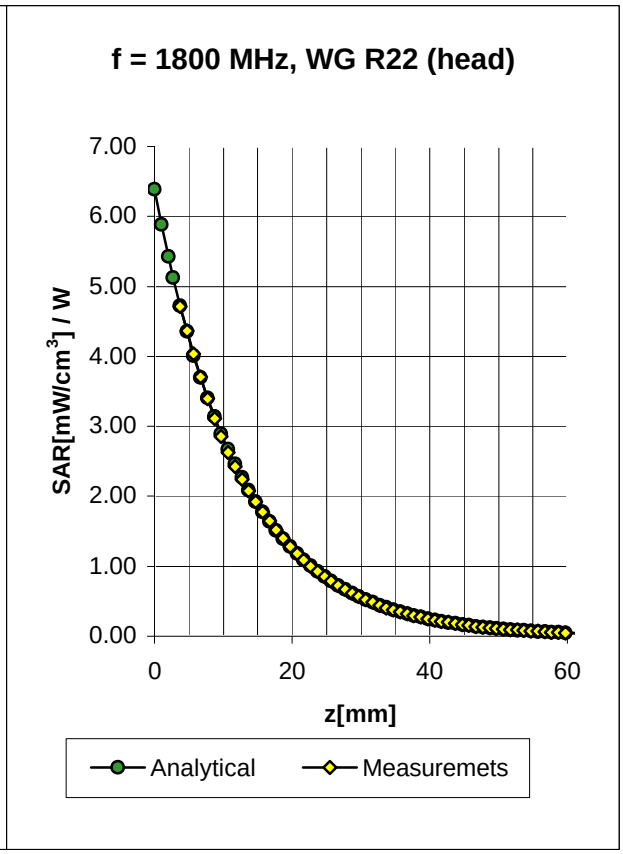
(TEM-Cell:ifi110)





Conversion Factor Assessment





Head **900 MHz** e_r **= 42 ± 5%** s **= 0.97 ± 10% mho/m**

ConvF X	**6.83**	± 7% (k=2)	Boundary effect:	
ConvF Y	**6.83**	± 7% (k=2)	Alpha	**0.37**
ConvF Z	**6.83**	± 7% (k=2)	Depth	**2.48**

Head **1800 MHz** e_r **= 40 ± 5%** s **= 1.40 ± 10% mho/m**

ConvF X	**5.78**	± 7% (k=2)	Boundary effect:	
ConvF Y	**5.78**	± 7% (k=2)	Alpha	**0.53**
ConvF Z	**5.78**	± 7% (k=2)	Depth	**2.01**

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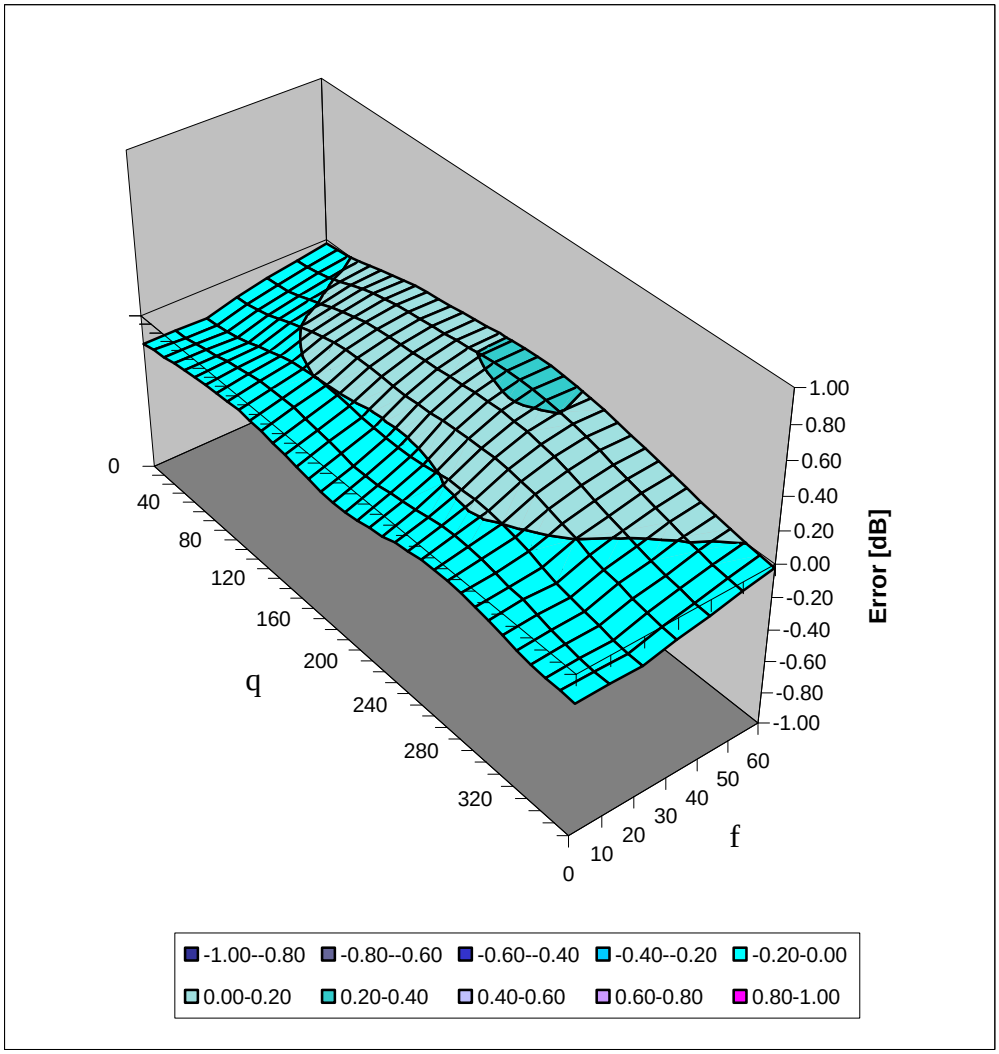
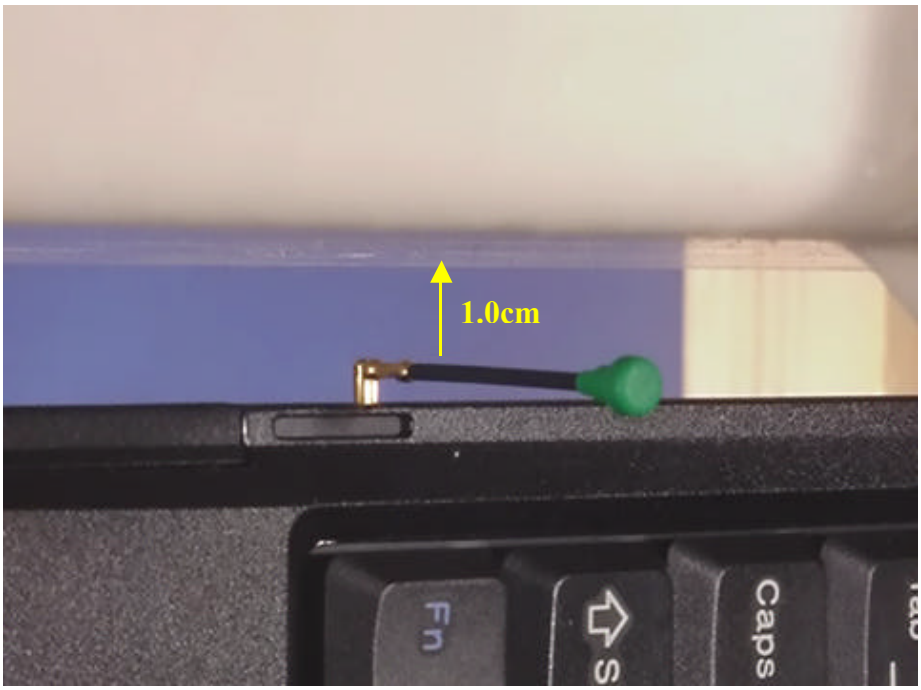
Deviation from Isotropy in HSL

Error (q,f), f = 900 MHz



APPENDIX D - SAR TEST SETUP PHOTOGRAPHS

BODY SAR TEST SETUP PHOTOGRAPHS
with 1.0cm Separation Distance

BODY SAR TEST SETUP PHOTOGRAPHS
with 1.0cm Separation Distance