Deutscher Akkreditierungs Rat

DAT-P-152/98-01

Report

Dosimetric Assessment of the Portable Device Siemens AX72 (FCC ID: PWX-AX72)

According to the FCC Requirements

September 28, 2005

IMST GmbH
Carl-Friedrich-Gauß-Str. 2
D-47475 Kamp-Lintfort

Customer
Siemens Information & Communication Mobile LLC
16475 West bernado Drive, Suite 400
CA 92127 San Diego

The test results only relate to the items tested.
This report shall not be reproduced except in full without the written approval of the testing laboratory.

dasy_report_fcc_1900_4.4.doc/14.09.2005/ABo

Executive Summary

The AX72 is a mobile phone (Portable Device) from Siemens operating in the 900 MHz, 1800 MHz and 1900 MHz frequency range. The device has an integrated antenna and the system concepts used are the GSM 900, GSM 1800 and PCS 1900 standards including GPRS Class 8

The objective of the measurements done by IMST was the dosimetric assessment of one device in the PCS 1900 standard with and without cam.

The examinations have been carried out with the dosimetric assessment system „DASY4“.

The measurements were made according to the Supplement C to OET Bulletin 65 of the Federal Communications Commission (FCC) Guidelines [OET 65] for evaluating compliance of mobile and portable devices with FCC limits for human exposure (general population) to radiofrequency emissions. All measurements have been performed in accordance to the recommendations given by SPEAG.

The Siemens AX72 mobile phone (FCC ID: PWX-AX72) is in compliance with the Federal Communications Commission (FCC) Guidelines [OET 65] for uncontrolled exposure.

The phone was tested in addition to the head positions in the following configurations:

Body worn with the following accessories:

- **GSM with and without headset (0mm distance)**
- **GPRS (Class 8) with data cable (0mm distance)**

prepared by: ..... reviewed by: .....

Alexander Rahn
test engineer

André van den Bosch
quality assurance engineer

IMST GmbH
Carl-Friedrich-Gauß-Straße 2
D-47475 Kamp-Lintfort

Tel. +49- 2842-981 378
Fax +49- 2842-981 399
email: vandenBosch@imst.de

Table of Contents

1 SUBJECT OF INVESTIGATION 4

2 THE IEEE STANDARD C95.1 AND THE FCC EXPOSURE CRITERIA 4

2.1 DISTINCTION BETWEEN EXPOSED POPULATION, DURATION OF EXPOSURE AND FREQUENCIES 4

2.2 DISTINCTION BETWEEN MAXIMUM PERMISSIBLE EXPOSURE AND SAR LIMITS 5

2.3 SAR LIMIT 5

3 THE FCC MEASUREMENT PROCEDURE 6

3.1 GENERAL REQUIREMENTS 6

3.2 DEVICE OPERATING NEXT TO A PERSON'S EAR 6

4 BODY-WORN CONFIGURATIONS 9

4.1 POC (PTT) POSITION 9

4.2 PHANTOM REQUIREMENTS 10

4.3 TEST TO BE PERFORMED 10

5 THE MEASUREMENT SYSTEM 10

5.1 PHANTOM 12

5.2 PROBE 12

5.3 MEASUREMENT PROCEDURE 13

5.4 UNCERTAINTY ASSESSMENT 14

6 SAR RESULTS 15

7 EVALUATION 18

8 APPENDIX 20

8.1 ADMINISTRATIVE DATA 20

8.2 DEVICE UNDER TEST AND TEST CONDITIONS 20

8.3 TISSUE RECIPES 21

8.4 MATERIAL PARAMETERS 21

8.5 SIMPLIFIED PERFORMANCE CHECKING 22

8.6 ENVIRONMENT 26

8.7 TEST EQUIPMENT 26

8.8 CERTIFICATES OF CONFORMITY 28

8.9 PICTURES OF THE DEVICE UNDER TEST 29

8.10 TEST POSITIONS FOR THE DEVICE UNDER TEST 33

8.11 PICTURES TO DEMONSTRATE THE REQUIRED LIQUID DEPTH 38

9 REFERENCES 38

1 Subject of Investigation

The AX72 is a mobile phone (Portable Device) from Siemens operating in the 900 MHz, 1800 MHz and 1900 MHz frequency range. The device has an integrated antenna and the system concepts used are the GSM 900, GSM 1800 and PCS 1900 standards including GPRS Class 8.

Fig. 1:Picture of the device under test

The objective of the measurements done by IMST was the dosimetric assessment of one device in the PCS 1900 standard. The examinations have been carried out with the dosimetric assessment system „DASY4“ described below.

2 The IEEE Standard C95.1 and the FCC Exposure Criteria

In the USA the recent FCC exposure criteria [OET 65] are based upon the IEEE Standard C95.1 [IEEE C95.1]. The IEEE standard C95.1 sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz.

2.1 Distinction Between Exposed Population, Duration of Exposure and Frequencies

The American Standard [IEEE C95.1] distinguishes between controlled and uncontrolled environment. Controlled environments are locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment or by other cognizant persons. Uncontrolled environments are locations where there is the exposure of individuals who have no knowledge or control of their exposure. The exposures may occur in living quarters or workplaces. For exposure in controlled environments higher field strengths are admissible. In addition the duration of exposure is considered.

Due to the influence of frequency on important parameters, as the penetration depth of the electromagnetic fields into the human body and the absorption capability of different tissues, the limits in general vary with frequency.

2.2 Distinction between Maximum Permissible Exposure and SAR Limits

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength *E* inside the human body, the conductivity σ and the mass density ρ of the biological tissue:

$$SAR = \sigma \frac{E^2}{\rho} = c \left. \frac{\partial T}{\partial t} \right|_{t \to 0+} \quad . \tag{1}$$

The specific absorption rate describes the initial rate of temperature rise $\partial T / \partial t$ as a function of the specific heat capacity *c* of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric *E* and magnetic field strength *H* and power density *S*, derived from the SAR limits. The limits for *E*, *H* and *S* have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded.

For the relevant frequency range the maximum permissible exposure may be exceeded if the exposure can be shown by appropriate techniques to produce SAR values below the corresponding limits.

2.3 SAR Limit

In this report the comparison between the American exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 1 g (SAR_{1g}) with the shape of a cube.

Standard	Status	SAR limit [W/kg]
IEEE C95.1	In force	1.6

Table 1: Relevant spatial peak SAR limit averaged over a mass of 1 g.

3 The FCC Measurement Procedure

The Federal Communications Commission (FCC) has published a report and order on the 1st of August 1996 [FCC 96-326], which requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radiofrequency emissions [OET 65].

3.1 General Requirements

The test shall be 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 shall be in the range of 20°C to 26°C and 30-70% humidity.

3.2 Device Operating Next to a Person's Ear

3.2.1 Phantom Requirements

The phantom is a simplified representation of the human anatomy and comprised of material with electrical properties similar to the corresponding tissues. The physical characteristics of the phantom model shall resemble the head and the neck of a user since the shape is a dominant parameter for exposure.

3.2.2 Test Positions

As it cannot be expected that the user will hold the mobile phone exactly in one well defined position, different operational conditions shall be tested. The Supplement C to OET Bulletin 65 requires two test positions. For an exact description helpful geometrical definitions are introduced and shown in Fig. 2 - 3.

There are two imaginary lines on the mobile, the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width w_t of the handset at the level of the acoustic output (point A on Fig. 2), and the midpoint of the width w_b of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Fig. 2). The two lines intersect at point A.

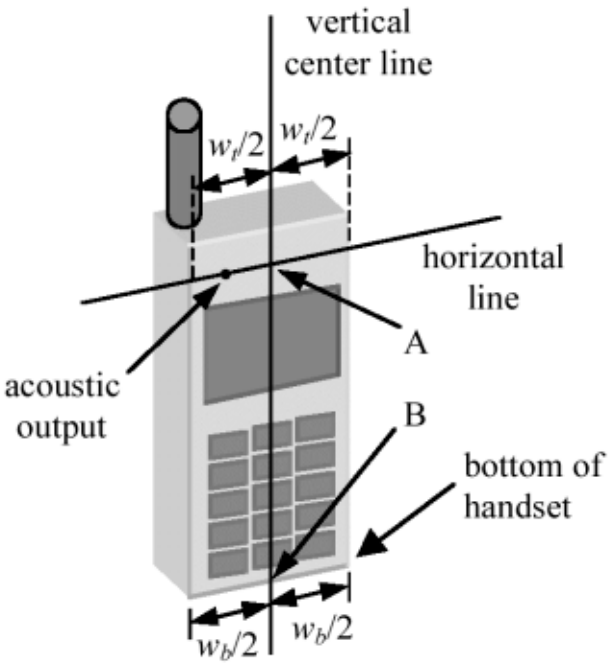

Fig. 2: Handset vertical and horizontal reference lines.

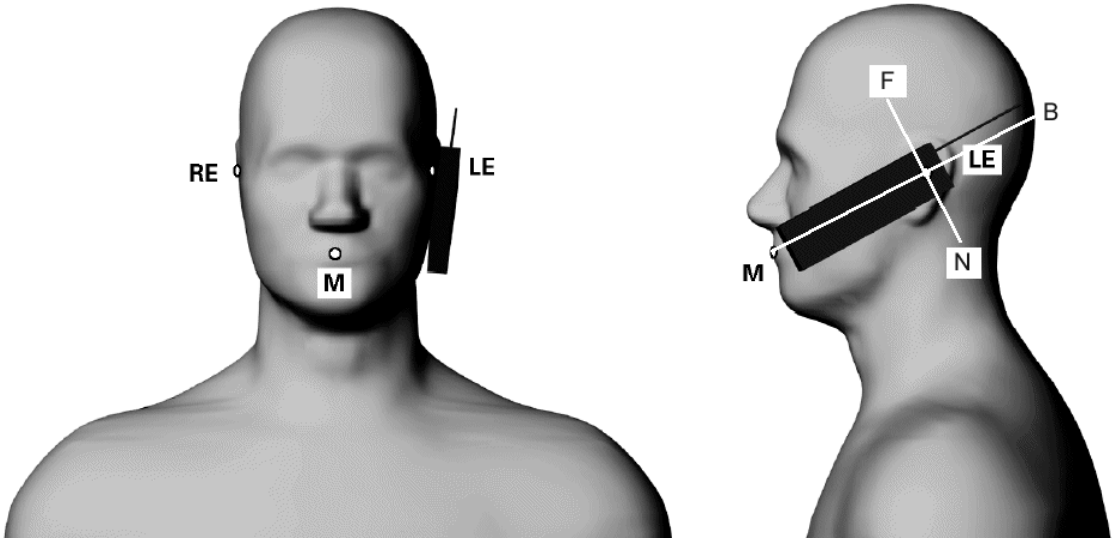

Fig. 3: Phantom reference points.

According to Fig. 3 the human head position is given by means of the following three reference points: auditory canal opening of both ears (RE and LE) and the center of the closed mouth (M). The ear reference points are 15-17 mm above the entrance to the ear canal along the BM line (back-mouth), as shown in Fig. 3. The plane passing through the two ear canals and M is defined as the reference plane. The line NF (Neck-Front) perpendicular to the reference plane and passing through the RE (or LE) is called the reference pivoting line. Line BM is perpendicular to the NF line. With this definitions the test positions are given by

dasy_report_fcc_1900_4.4.doc/14.09.2005/ABo

- **Cheek position (see Fig. 4):**

Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Fig. 3), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom. Translate the handset towards the phantom along the line passing through RE and LE until the handset touches the ear. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane). Rotate the phone around the vertical centerline until the phone (horizontal line) is symmetrical with respect to the line NF. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, rotate the handset about the line NF until any point on the handset is in contact with a phantom point below the ear.

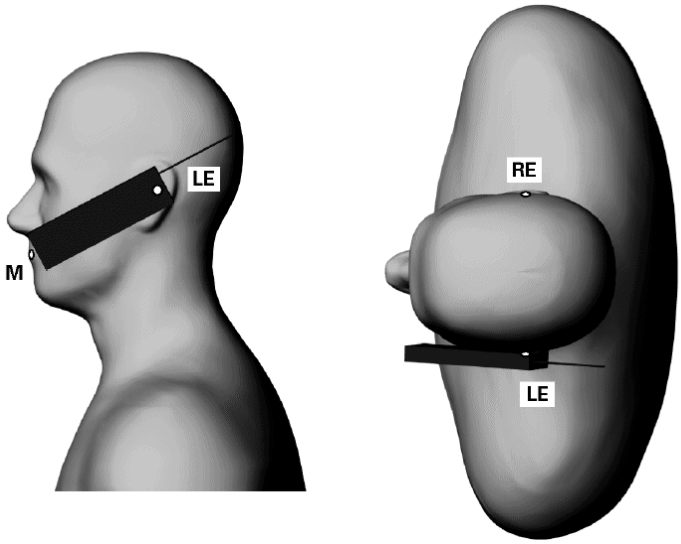

Fig. 4: The cheek position.

- **Tilted position (see Fig. 5):**

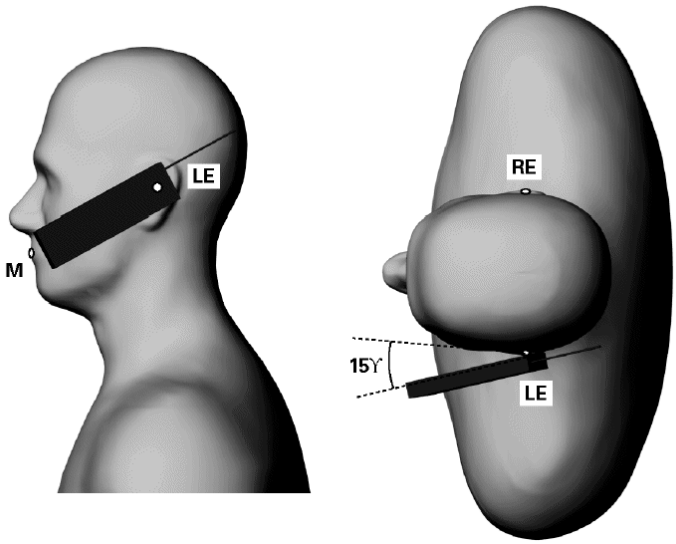

Fig. 5: The tilted position.

While maintaining the orientation of the phone retract the phone parallel to the reference plane far enough to enable a rotation of the phone by 15°. Rotate the phone around the horizontal line by 15°. While maintaining the orientation of the phone, move the phone parallel to the reference plane until any part of the phone touches the head. In this position, point A will be located on the line RE-LE.

3.2.3 Test to be Performed

The SAR test shall be performed with both phone positions described above, on the left and right side of the phantom. The device shall be measured for all modes operating when the device is next to the ear, even if the different modes operate in the same frequency band.

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.

The SAR test shall be performed at the high, middle and low frequency channels of each operating mode. If the SAR measured at the middle channel for each test configuration is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional.

4 Body-worn Configurations

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.

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.

4.1 PoC (PTT) Position

The PoC (PTT) configurations shall be tested with the front of the device positioned at 25 mm from a flat phantom (display towards the phantom).

4.2 Phantom Requirements

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

4.3 Test to be Performed

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.

The SAR test shall be performed at the high, middle and low frequency channels of each operating mode. If the SAR measured at the middle channel for each test configuration is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional

5 The Measurement System

DASY is an abbreviation of „Dosimetric Assessment System“ and describes a system that is able to determine the SAR distribution inside a phantom of a human being according to different standards. The DASY4 system consists of the following items as shown in Fig: 6. Additional Fig: 7 shows the equipment, similar to the installations in other laboratories.

- High precision robot with controller
- Measurement server (for surveillance of the robot operation and signal filtering)
- Data acquisition electronics DAE (for signal amplification and filtering)
- Field probes calibrated for use in liquids
- Electro-optical converter EOC (conversion from the optical into a digital signal)
- Light beam (improving of the absolute probe positioning accuracy)
- Two SAM phantoms filled with tissue simulating liquid
- DASY4 software
- SEMCAD

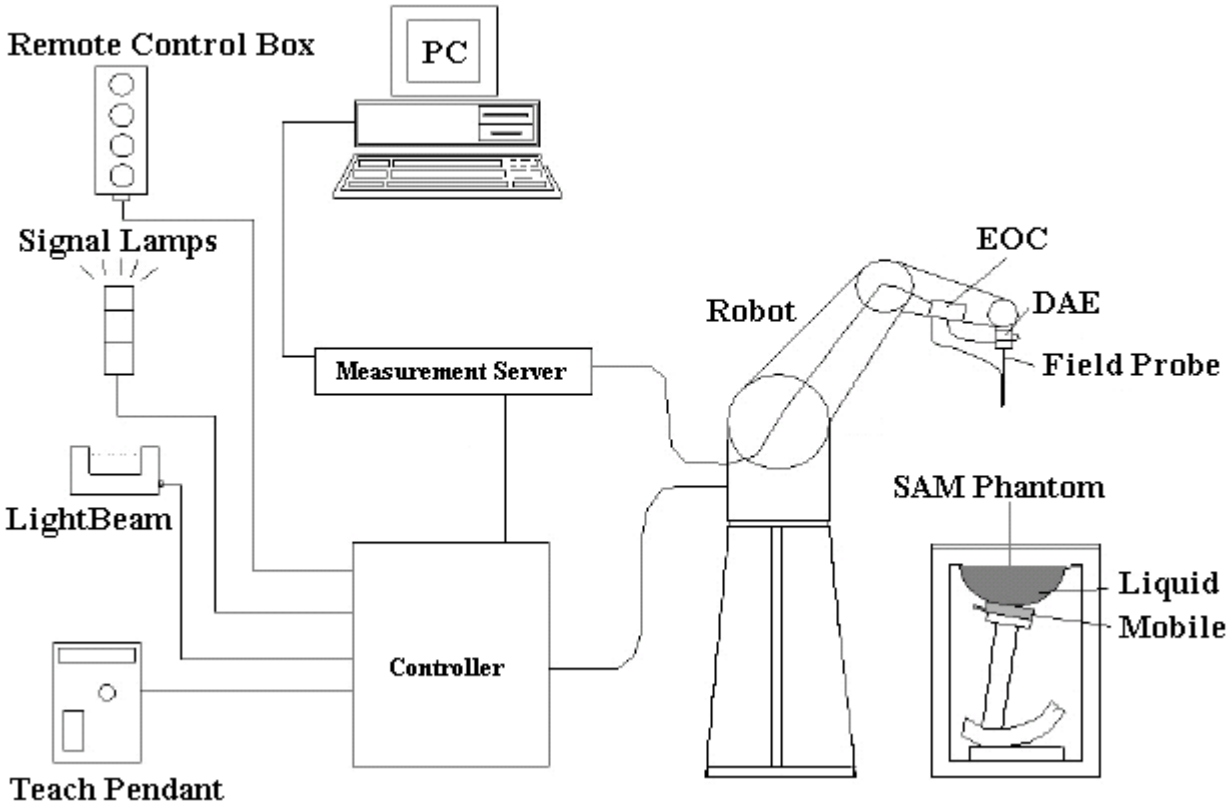

Fig. 6: The DASY4 measurement system.

Fig. 7: The measurement set-up with two SAM phantoms containing tissue simulating liquid.

The mobile phone operating at the maximum power level is placed by a non metallic device holder (delivered from Schmid & Partner) in the above described positions at a shell phantom of a human being. The distribution of the electric field strength *E* is measured in the tissue simulating liquid within the shell phantom. For this miniaturised field probes with high sensitivity and low field disturbance are used. Afterwards the corresponding SAR values are calculated with the known electrical conductivity σ and the mass density ρ of the tissue in the SEMCAD FDTD software. The software is able to determine the averaged SAR values (averaging region 1 g or 10 g) for compliance testing.

The measurements are done by two scans: first a coarse scan determines the region of the maximum SAR, afterwards the averaged SAR is measured in a second scan within the shape of a cube. The measurement time takes about 20 minutes.

5.1 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM Twin Phantom V4.0) defined by the IEEE SCC-34/SC2 group and delivered by Schmid & Partner Engineering AG is used. The phantom is a fibreglass shell integrated in a wooden table. The thickness of the phantom amounts to 2 mm ± 0.2 mm. It enables the dosimetric evaluation of left and right hand phone usage and includes an additional flat phantom part for the system performance check and body worn measurements. The phantom set-up includes a coverage (polyethylene), which prevents the evaporation of the liquid. The details and the Certificate of conformity can be found in Fig. 12.

5.2 Probe

For the measurements the Dosimetric E-Field Probes ET3DV6 or EX3DV4 with following specifications are used. They are manufactured and calibrated in accordance with FCC [OET 65] and IEEE [IEEE 1528-2003] recommendations annually by Schmid & Partner Engineering AG.

ET3DV6:

- Dynamic range: 5μW/g to > 100mW/g
- Tip diameter: 6.8 mm
- Probe linearity: ± 0.2 dB (30 MHz to 3 GHz)
- Axial isotropy: ± 0.2 dB
- Spherical isotropy: ± 0.4 dB
- Distance from probe tip to dipole centers: 2.7 mm
- Calibration range: 900MHz / 1800MHz / 1900MHz / 1950 MHz / 2450MHz for head and body simulating liquid
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°

EX3DV4:

- Dynamic range: 10μW/g to > 100mW/g (noise typically < 1μW/g)
- Tip diameter: 2.5 mm
- Probe linearity: ± 0.2 dB (30 MHz to 3 GHz)
- Axial isotropy: ± 0.2 dB
- Spherical isotropy: ± 0.4 dB
- Distance from probe tip to dipole centers: 1.0 mm
- Calibration range: : 900MHz / 1800MHz / 1900MHz / 1950 MHz / 2450MHz for head and body simulating liquid
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°

5.3 Measurement Procedure

The following steps are used for each test position:

- Establish a call with the maximum output power with a base station simulator. The connection between the mobile phone and the base station simulator is established via air interface.
- Measurement of the local E-field value at a fixed location (P1). This value serves as a reference value for calculating a possible power drift.
- Measurement of the SAR distribution with a grid spacing of 15 mm x 15 mm and a constant distance to the inner surface of the phantom. Since the sensors can not directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With this values the area of the maximum SAR is calculated by a interpolation scheme (combination of a least-square fitted function and a weighted average method). Additional all peaks within 2 dB of the maximum SAR are searched.
- Around this points, a cube of 30 mm x 30 mm x 30 mm is assessed by measuring 7 x 7 x 7 points whereby the first two measurement points are within the required 10 mm of the surface. With these data, the peak spatial-average SAR value can be calculated within the SEMCAD software.
- The used extrapolation and interpolation routines are all based on the modified Quadratic Shepard´s method [DASY4].
- Repetition of the E-field measurement at the fixed location (P1) and repetition of the whole procedure if the two results differ by more than ± 0.21dB.

5.4 Uncertainty Assessment

Table 2 includes the uncertainty budget suggested by the [IEEE 1528-2003] and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be ± 20.6%.

Error Sources	Uncertainty Value	Probability Distribution	Divisor	c_i	Standard Uncertainty	v_i^2 or v_{eff}
Measurement System						
Probe calibration	± 4.8 %	Normal	1	1	± 4.8 %	∞
Axial isotropy	± 4.7 %	Rectangular	√3	0.7	± 1.9 %	∞
Hemispherical isotropy	± 9.6 %	Rectangular	√3	0.7	± 3.9 %	∞
Boundary effects	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Linearity	± 4.7 %	Rectangular	√3	1	± 2.7 %	∞
System detection limit	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Readout electronics	± 1.0 %	Normal	1	1	± 1.0 %	∞
Response time	± 0.8 %	Rectangular	√3	1	± 0.5 %	∞
Integration time	± 2.6%	Rectangular	√3	1	± 1.5 %	∞
RF ambient conditions	± 3.0 %	Rectangular	√3	1	± 1.7 %	∞
Probe positioner	± 0.4 %	Rectangular	√3	1	± 0.2 %	∞
Probe positioning	± 2.9 %	Rectangular	√3	1	± 1.7 %	∞
Algorithms for max SAR eval.	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Test Sample Related						
Device positioning	± 2.9 %	Normal	1	1	± 2.9 %	145
Device holder	± 3.6 %	Normal	1	1	± 3.6 %	5
Power drift	± 5.0 %	Rectangular	√3	1	± 2.9 %	∞
Phantom and Set-up						
Phantom uncertainty	± 4.0 %	Rectangular	√3	1	± 2.3 %	∞
Liquid conductivity (target)	± 5.0 %	Rectangular	√3	0.64	± 1.8 %	∞
Liquid conductivity (meas.)	± 2.5 %	Normal	1	0.64	± 1.6 %	∞
Liquid permittivity (target)	± 5.0 %	Rectangular	√3	0.6	± 1.7 %	∞
Liquid permittivity (meas.)	± 2.5 %	Normal	1	0.6	± 1.5 %	∞
Combined Uncertainty					± 10.3 %	

Table 2: Uncertainty budget of DASY4.

6 SAR Results

The Tables below contain the measured SAR values averaged over a mass of 1 g.

Phantom Configuration Liquid depth: 16.4 cm	Test Position	SAR_{1g} [W/kg] (Drift[dB])			Temperature	
		Channel 512 1850.2 MHz 29.7 dBm	Channel 661 1880.0 MHz 29.3 dBm	Channel 810 1909.8 MHz 29.0 dBm	Ambient [° C]	Liquid [° C]
Left Side	Cheek		0.416* (-0.118)		21.4	20.9
	Tilted		0.530 (0.008)		21.3	20.9
Right Head	Cheek		0.346 (-0.181)		21.3	20.9
	Tilted		0.482 (0.043)		21.3	20.8

Table 3: Measured head phantom results for PCS 1900 for the Siemens AX72 without camera (*Max Cube). .

Phantom Configuration Liquid depth: 16.4 cm	Test Position	SAR_{1g} [W/kg] (Drift[dB])			Temperature	
		Channel 512 1850.2 MHz 29.7 dBm	Channel 661 1880.0 MHz 29.3 dBm	Channel 810 1909.8 MHz 29.0 dBm	Ambient [° C]	Liquid [° C]
Left Side	Cheek		0.419* (-0.041)		21.3	20.8
	Tilted		0.497 (0.017)		21.3	20.8
Right Head	Cheek		0.320 (-0.022)		21.4	20.9
	Tilted		0.425 (0.028)		21.4	20.9

Table 4: Measured head phantom results for PCS 1900 for the Siemens AX72 with camera (*Max Cube).

Accessory Liquid depth: 16.3 cm	SAR_{1g} [W/kg] (Drift[dB])			Temperature	
	Channel 512 1850.2 MHz 29.7 dBm	Channel 661 1880.0 MHz 29.3 dBm	Channel 810 1909.8 MHz 29.0 dBm	Ambient [° C]	Liquid [° C]
GSM, without accessory, (Antenna towards the phantom, 0mm distance)	1.200 (0.015)	1.190 (-0.003)	1.320 (0.001)	21.9/21.9/ 21.9	21.1/21.0/ 21.1
GSM, headset (1), (Antenna towards the phantom, 0mm distance)	1.270 (-0.138)	1.220 (-0.007)	1.370 (-0.062)	21.8/21.9/ 21.9	21.1/21.0/ 21.1
GPRS Class 8, data cable (2), (Antenna towards the phantom, 0mm distance)	1.400 (0.066)	1.270 (0.059)	1.390 (-0.115)	21.8/21.8/ 21.8	21.0/21.0/ 21.1

Table 5: Measurement results in body-worn configuration for PCS 1900 for the Siemens AX72 (*Max Cube).

The "* Max Cube" labeling indicates that during the grid scanning an additional peak was found which was within 2.0 dB of the highest peak. The value of the highest cube is given in the tables above, the value from the second assessed cube is given in the SAR distribution plots (see appendix).

For the body worn measurements the sample was only positioned with the antenna towards the phantom since this position delivers the highest SAR values.

The above mentioned power values are "conducted" power values, they were measured on the same sample which was prepared for the FCC approval. The values were delivered by Siemens, Denmark and also verified during the SAR test.

To control the output power stability during the SAR test the used DASY4 system calculates the power drift by measuring the e-field at the same location at the beginning and at the end of the measurement for each test position. These drift values can be found in the above tables labeled as: (Drift[dB]). This ensures that the power drift during one measurement is within 5%. Please note that we add the measured "power drift" values from the DASY4 system since the used CMU 200 delivers only 1 usable position after decimal point and therefore only one power level is listed in the above tables.

The provided tour case FCT 650 dictates a distance of 10mm between mobile phone and phantom. Since the carry case contains no metal parts, the measurements were not required.

(1) The used headset is HSS-610 (S30880-S7101-A550). Since the three headsets provided in the accessory list for the Siemens AX72 shows equal performance, because of the same type and size of plugs connected to the phone, the headset HHS-610 was chosen randomly for the SAR body worn measurements.

(2) The used data cable is DCA-500 (S30880-S6501-A802-1). Since the two data cables provided in the accessory list for the Siemens AX72 shows equal performance, because of the same type and size of plugs connected to the phone, the data cable DCA-500 was chosen randomly for the SAR body worn measurements.

7 Evaluation

In Fig. 8 the head phantom SAR results for PCS 1900 given in Table 3 - 4 are summarized and compared to the limit. In Fig. 9 the SAR results in body-worn configuration for PCS 1900 given in Table 5 are summarized and compared to the limit.

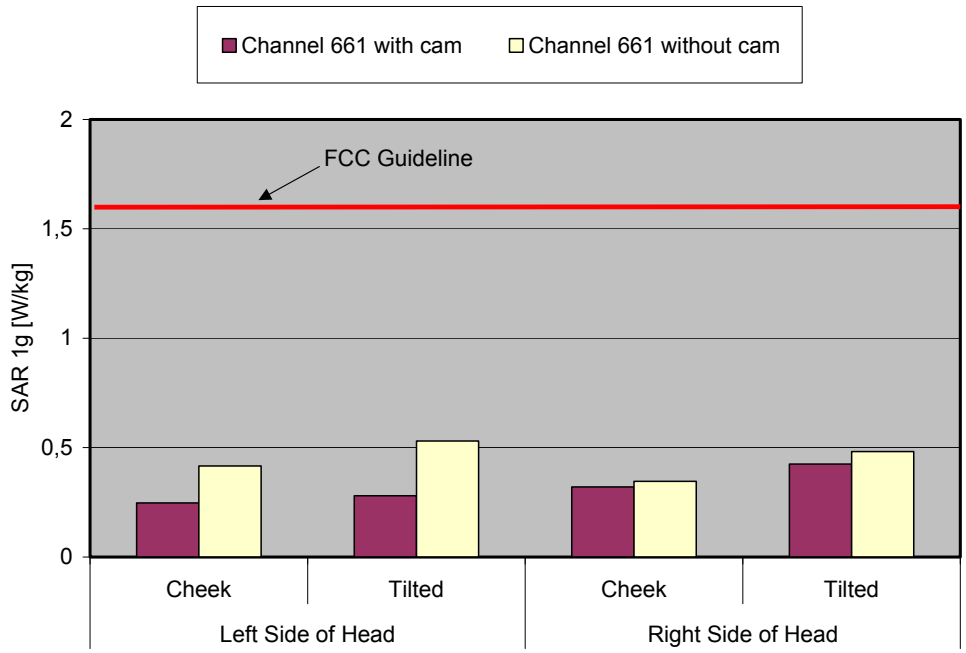

Fig. 8: The measured head phantom SAR values for the Siemens AX72 for PCS 1900 in comparison to the FCC exposure limit.

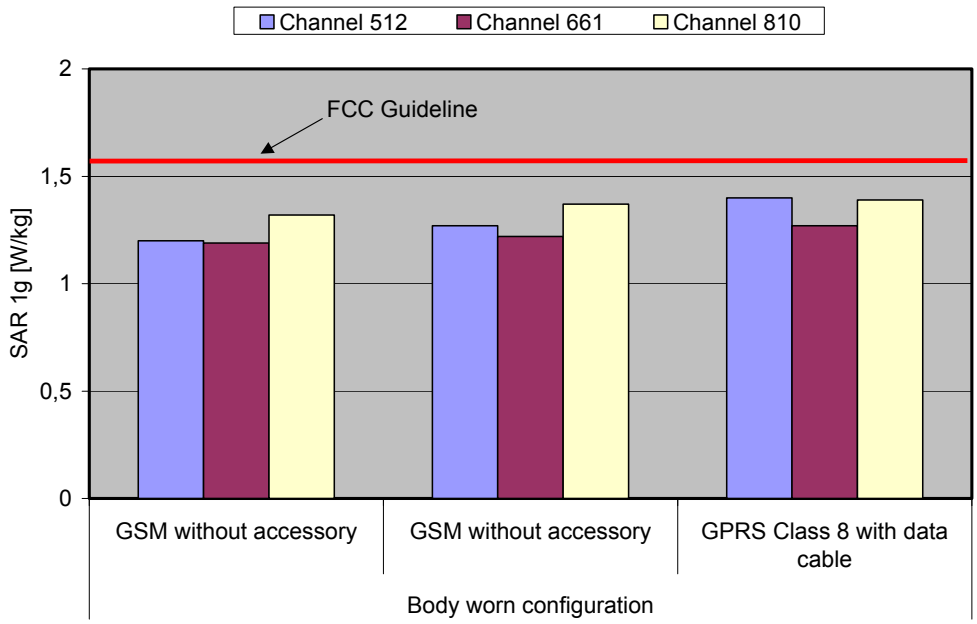

Fig. 9: The measured SAR values in body-worn configuration for the Siemens AX72 for PCS 1900 in comparison to the FCC exposure limit.

The Siemens AX72 mobile phone (FCC ID: PWX-AX72) is in compliance with the Federal Communications Commission (FCC) Guidelines [OET 65] for uncontrolled exposure.

The phone was tested in addition to the head positions in the following configurations:

Body worn with the following accessories:

- **GSM with and without headset (0mm distance)**
- **GPRS (Class 8) with data cable (0mm distance)**

8 Appendix

8.1 Administrative Data

Date of validation:	1900 MHz, Head: September 26, 2005
	1900 MHz, Body: September 23, 2005
Date of measurement:	September 23, 2005 - September 26, 2005
Data stored:	Siemens_6620_545

8.2 Device under Test and Test Conditions

MTE:	Siemens AX72, Production Line Unit
Date of receipt:	September 20, 2005
IMEI:	004400013392855
FCC ID:	PWX-AX72
Equipment class:	Portable device
RF exposure environment:	General Population/Uncontrolled
Power supply:	Internal Battery (Other batteries not available)
Antenna:	Antenna Type: integrated
Tested Accessories, Body:	headset (HHS-610, S30880-S7101-A550)
	data cable (DCA-500, S30880-5601-A801-2)
Available Accessories:	headset (HHS-500, S30880-S5601-A510)
	headset (HHS-510, S30880-S5601-A520)
	headset (HHS-610, S30880-S7101-A550)
	data cable (DCA-500, S30880-5601-A801-2)
	data cable (DCA-510, S30880-S5601-A810)
	Tourcase (FCT-650), Beltcase (FCL-600)
Measured Standards:	PCS 1900
Operational Mode Class:	B (GPRS and GSM, but not simultaneously)
GPRS Multislot Class:	8
Method to establish a call:	PCS 1900: Basestation simulator, using the air interface
Modulation:	GMSK
Crest Factor:	Talk Mode: 8; GPRS: 8
TX range:	PCS 1900 : 1850.2 MHz – 1909.8 MHz
RX range:	PCS 1900 : 1930.2 MHz – 1989.8 MHz
Used TX Channels:	PCS 1900: low: ch 512, center: ch 661, high: ch 810
Power Class:	PCS 1900: 1, tested with power level 0
Used Phantom:	SAM Twin Phantom V4.0, as defined by the IEEE SCC-34/SC2 group and delivered by Schmid & Partner Engineering AG

8.3 Tissue Recipes

The following recipes are provided in percentage by weight.

1900 MHz, Head:	45.65%	Diethylenglykol-monobutylether
	54.00%	De-Ionized Water
	0.35%	Salt
1900 MHz, Body:	29.68%	Diethylenglykol-monobutylether
	70.00%	De-Ionized Water
	0.32%	Salt

8.4 Material Parameters

For the measurement of the following parameters the HP 85070B dielectric probe kit is used, representing the open-ended coaxial probe measurement procedure. The measured values should be within ± 5% of the recommended values given by the FCC.

Frequency		ε_r	σ [S/m]	Temperature	
				Ambient [° C]	Liquid [° C]
1900 MHz (Head)	Recommended Value	40.00 ± 2.00	1.40 ± 0.07	20.0 - 26.0	-
	Measured Value	41.60	1.44	21.4	20.9
1900 MHz (Body)	Recommended Value	53.30 ± 2.60	1.52 ± 0.07	20.0 - 26.0	-
	Measured Value	51.10	1.50	21.9	21.0

Table 6: Parameters of the tissue simulating liquids.

8.5 Simplified Performance Checking

The simplified performance check was realized using the dipole validation kits. The input power of the dipole antennas were 250 mW (cw signal) and they were placed under the flat part of the SAM phantom. The target and measured results are listed in the Table 7 - 8 and shown in Fig. 10-11. The target values were adopted from the manufactures calibration certificates which are attached in the appendix. Table 9 includes the uncertainty assessment for the system performance checking which was suggested by the [IEEE 1528-2003] and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be ± 16.8%.

Available Dipoles		SAR_{1g} [W/kg]	ε_r	σ [S/m]
D1900V2, SN #535	Target Values Head	9.69	38.90	1.45
D1900V2, SN #5d051		9.75	38.70	1.47
D1900V2, SN #535	Target Values Body	10.40	51.60	1.58
D1900V2, SN #5d051		9.80	53.30	1.60

Table 7: Dipole target results as given by the manufactures calibration certificates .

Used Dipoles		SAR_{1g} [W/kg]	ε_r	σ [S/m]	Temperature	
					Ambient [° C]	Liquid [° C]
1900 MHz, **SN:** #535	Measured Values Head	9.45	41.60	1.44	21.4	20.9
1900 MHz, **SN:** #535	Measured Values Body	9.69	51.10	1.50	21.9	21.0

Table 8: Measured dipole validation results.

Test Laboratory: IMST GmbH, DASY Blue (I); File Name: 260905_b_1669.da4

DUT: Dipole 1900 MHz SN: 535; Type: D1900V2; Serial: D1900V2 - SN535
Program Name: System Performance Check at 1900 MHz

Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium parameters used: f = 1900 MHz; σ = 1.44 mho/m; ε_r = 41.6; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6R - SN1669; ConvF(5.11, 5.11, 5.11); Calibrated: 13.01.2005
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn631; Calibrated: 07.07.2005
- Phantom: SAM Glycol 1176; Type: Speag; Serial: 1176
- Measurement SW: DASY4, V4.5 Build 19; Postprocessing SW: SEMCAD, V1.8 Build 146

d=10mm, Pin=250mW/Area Scan (7x7x1): Measurement grid: dx=10mm, dy=10mm
Maximum value of SAR (measured) = 10.4 mW/g
d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 89.9 V/m; Power Drift = 0.010 dB
Peak SAR (extrapolated) = 16.3 W/kg
SAR(1 g) = 9.45 mW/g; SAR(10 g) = 4.98 mW/g
Maximum value of SAR (measured) = 10.7 mW/g

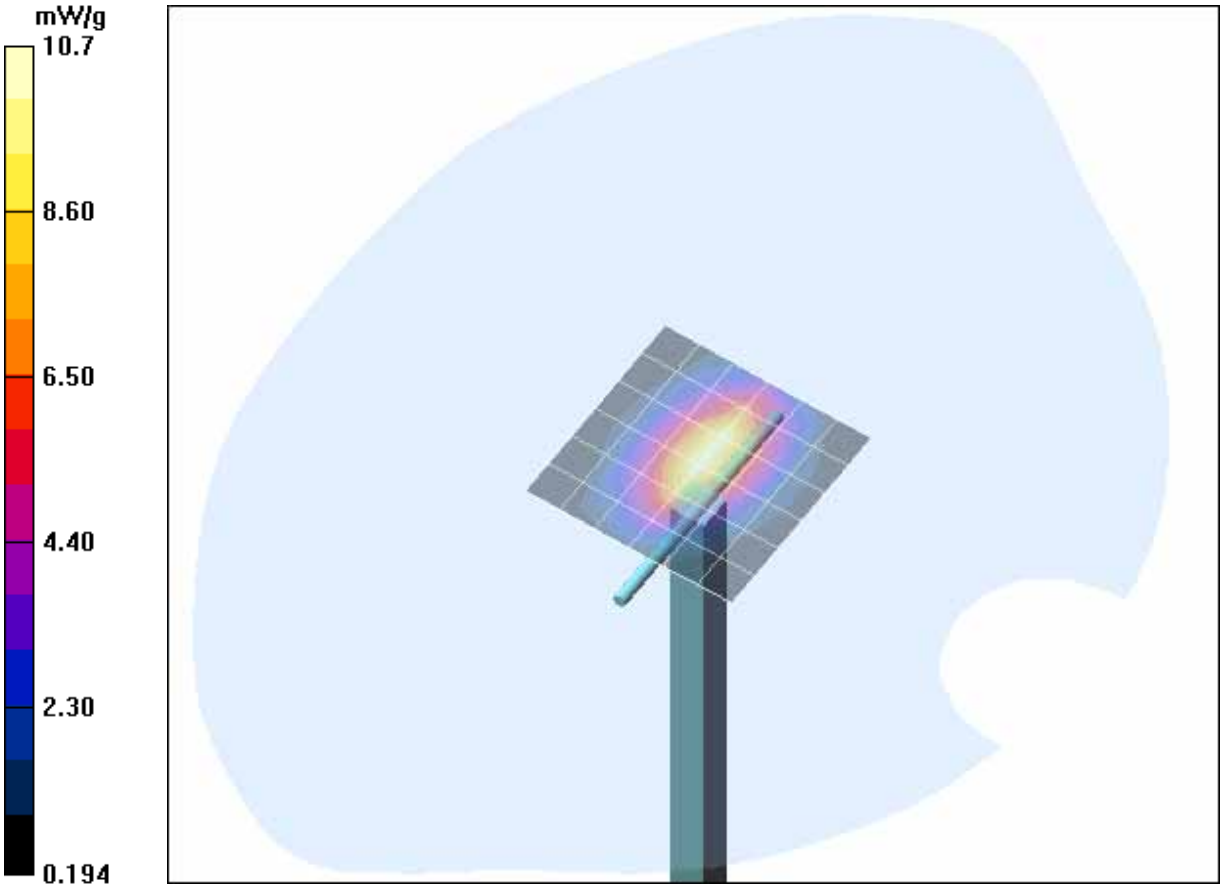

Fig. 10: Validation measurement 1900 MHz Head (September 26, 2005), coarse grid. Ambient Temperature: 21.4° C, Liquid Temperature: 20.9° C.

Test Laboratory: IMST GmbH, DASY Blue (I); File Name: 230905_b_1669.da4

DUT: Dipole 1900 MHz SN: 535; Type: D1900V2; Serial: D1900V2 - SN535
Program Name: System Performance Check at 1900 MHz

Communication System: CW; Frequency: 1900 MHz;Duty Cycle: 1:1
Medium parameters used: f = 1900 MHz; σ = 1.5 mho/m; ε_r = 51.1; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY4 Configuration:
- Probe: ET3DV6R - SN1669; ConvF(4.52, 4.52, 4.52); Calibrated: 13.01.2005
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn631; Calibrated: 07.07.2005
- Phantom: SAM Glycol 1176; Type: Speag; Serial: 1176
- Measurement SW: DASY4, V4.5 Build 19; Postprocessing SW: SEMCAD, V1.8 Build 146

d=10mm, Pin=250mW/Area Scan (7x7x1): Measurement grid: dx=10mm, dy=10mm
Maximum value of SAR (measured) = 11.0 mW/g
d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 92.2 V/m; Power Drift = -0.015 dB
Peak SAR (extrapolated) = 16.1 W/kg
SAR(1 g) = 9.69 mW/g; SAR(10 g) = 5.15 mW/g

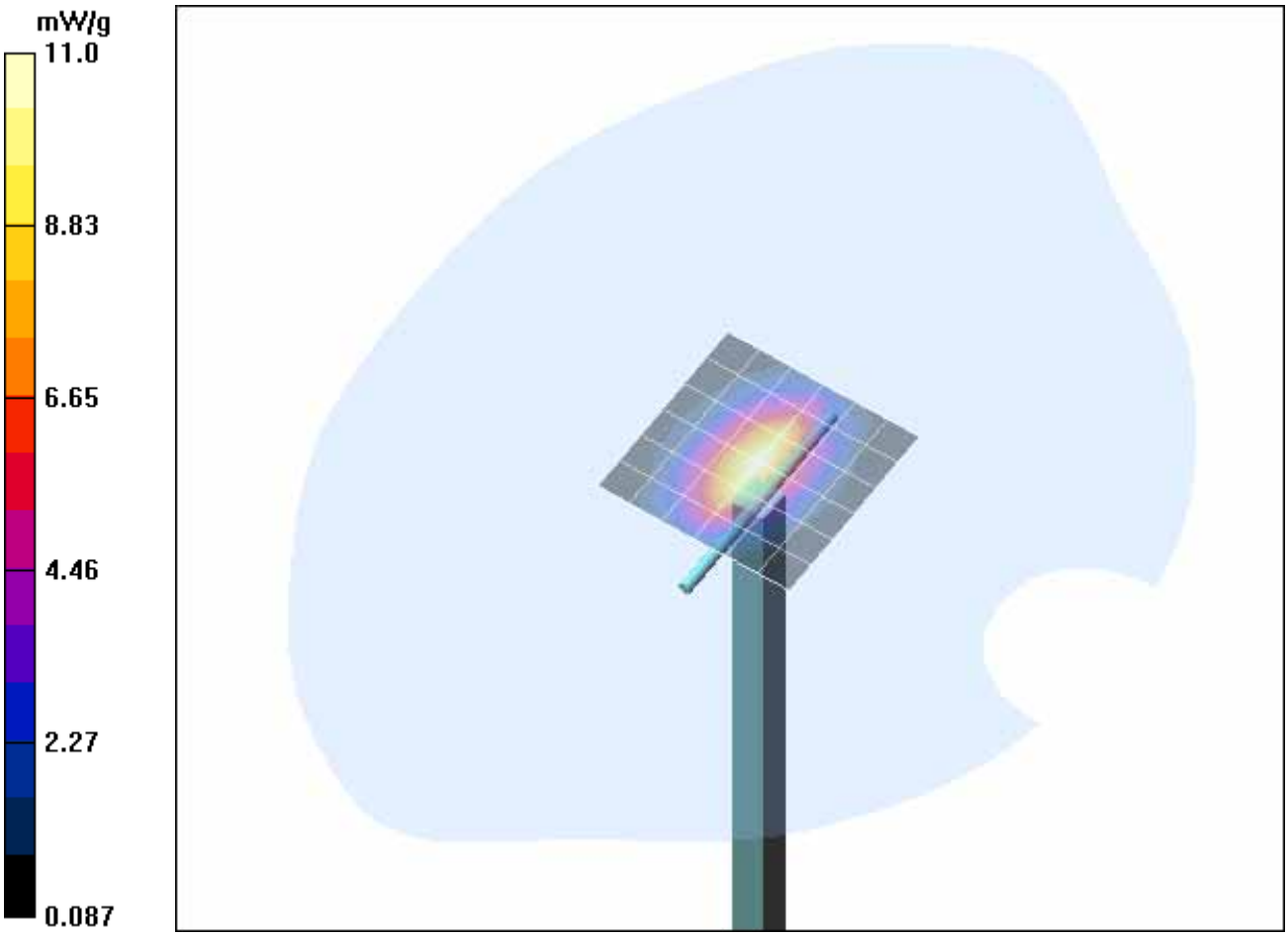

Fig. 11: Validation measurement 1900 MHz body (September 23, 2005), coarse grid. Ambient Temperature: 21.9° C, Liquid Temperature: 21.0° C.

Error Sources	Uncertainty Value	Probability Distribution	Divisor	c_i	Standard Uncertainty	v_i^2 or v_{eff}
Measurement System						
Probe calibration	± 4.8 %	Normal	1	1	± 4.8 %	∞
Axial isotropy	± 4.7 %	Rectangular	√3	1	± 2.7 %	∞
Hemispherical isotropy	± 0 %	Rectangular	√3	1	± 0 %	∞
Boundary effects	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Linearity	± 4.7 %	Rectangular	√3	1	± 2.7 %	∞
System detection limit	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Readout electronics	± 1.0 %	Normal	1	1	± 1.0 %	∞
Response time	± 0 %	Rectangular	√3	1	± 0 %	∞
Integration time	± 0%	Rectangular	√3	1	± 0 %	∞
RF ambient conditions	± 3.0 %	Rectangular	√3	1	± 1.7 %	∞
Probe positioner	± 0.4 %	Rectangular	√3	1	± 0.2 %	∞
Probe positioning	± 2.9 %	Rectangular	√3	1	± 1.7 %	∞
Algorithms for max SAR eval.	± 1.0 %	Rectangular	√3	1	± 0.6 %	∞
Dipole						
Dipole Axis to Liquid Distance	± 2.0 %	Rectangular	1	1	± 1.2 %	∞
Input power and SAR drift mea.	± 4.7 %	Rectangular	√3	1	± 2.7 %	∞
Phantom and Set-up						
Phantom uncertainty	± 4.0 %	Rectangular	√3	1	± 2.3 %	∞
Liquid conductivity (target)	± 5.0 %	Rectangular	√3	0.64	± 1.8 %	∞
Liquid conductivity (meas.)	± 2.5 %	Normal	1	0.64	± 1.6 %	∞
Liquid permittivity (target)	± 5.0 %	Rectangular	√3	0.6	± 1.7 %	∞
Liquid permittivity (meas.)	± 2.5 %	Normal	1	0.6	± 1.5 %	∞
Combined Uncertainty					± 8.4 %	

Table 9: Uncertainty budget for the system performance check.

8.6 Environment

To comply with the required noise level (less than 12 mW/kg) periodically measurements without a DUT were conducted.
Humidity: 40% ± 5 %

8.7 Test Equipment

Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
DASY4 Systems				
Software Versions DASY4	V4.5	N/A	N/A	N/A
Software Versions SEMCAD	V1.8	N/A	N/A	N/A
Dosimetric E-Field Probe	ET3DV6	1579	01/2005	01/2006
Dosimetric E-Field Probe	ET3DV6	1669	01/2005	01/2006
Dosimetric E-Field Probe	EX3DV4	3536	09/2005	09/2006
Data Acquisition Electronics	DAE 3	335	03/2005	03/2006
Data Acquisition Electronics	DAE 4	631	07/2006	07/2006
Phantom	SAM	1059	N/A	N/A
Phantom	SAM	1176	N/A	N/A
Phantom	SAM	1340	N/A	N/A
Phantom	SAM	1341	N/A	N/A
Dipoles				
Validation Dipole	D1900V2	535	11/2004	11/2005
Validation Dipole	D1900V2	5d051	08/2005	08/2006
Material Measurement				
Network Analyzer	HP8753D	3410A06555	12/2004	12/2005
Dielectric Probe Kit	HP85070B	US33020263	N/A	N/A

Table 10: SAR equipment.

Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
Power Meters				
Power Meter, Agilent	E4416A	GB41050414	12/2004	12/2005
Power Meter, Agilent	E4417A	GB41050441	09/2004	09/2005
Power Meter, Anritsu	ML2487A	6K00002319	09/2004	09/2005
Power Meter, Anritsu	ML2488A	6K00002078	09/2004	09/2005
Power Sensors				
Power Sensor, Agilent	E9301H	US40010212	12/2004	12/2005
Power Sensor, Agilent	E9301A	MY41495584	12/2004	12/2005
Power Sensor, Anritsu	MA2481B	031600	09/2004	09/2005
Power Sensor, Anritsu	MA2490A	031565	09/2004	09/2005
RF Sources				
Network Analyzer	HP8753D	3410A06555	12/2004	12/2005
Rohde & Schwarz	SME300	100142	N/A	N/A
Amplifiers				
Mini Circuits	ZHL-42	D012296	N/A	N/A
Mini Circuits	ZHL-42	D031104#01	N/A	N/A
Mini Circuits	ZVE-8G	D031004	N/A	N/A
Radio Tester				
Rohde & Schwarz	CMU200	835305/050	01/2005	01/2006
Willtek	4202S	0813151	N/A	N/A

Table 11: Test equipment, General.

8.8 Certificates of conformity

Schmid & Partner Engineering AG

Zeughausstrasse 43, 8004 Zurich, Switzerland, Phone +41 1 245 97 00, Fax +41 1 245 97 79

Certificate of conformity / First Article Inspection

Item	SAM Twin Phantom V4.0
Type No	QD 000 P40 BA
Series No	TP-1002 and higher
Manufacturer / Origin	Untersee Composites Hauptstr. 69 CH-8559 Fruthwilen Switzerland

Tests

The series production process used allows the limitation to test of first articles.
Complete tests were made on the pre-series Type No. QD 000 P40 AA, Serial No. TP-1001 and on the series first article Type No. QD 000 P40 BA, Serial No. TP-1006. Certain parameters have been retested using further series units (called samples).

Test	Requirement	Details	Units tested
Shape	Compliance with the geometry according to the CAD model.	IT'IS CAD File (*)	First article, Samples
Material thickness	Compliant with the requirements according to the standards	2mm +/- 0.2mm in specific areas	First article, Samples
Material parameters	Dielectric parameters for required frequencies	200 MHz – 3 GHz Relative permittivity < 5 Loss tangent < 0.05.	Material sample TP 104-5
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards	Liquid type HSL 1800 and others according to the standard.	Pre-series, First article

Standards

[1] CENELEC EN 50361
[2] IEEE P1528-200x draft 6.5
[3] IEC PT 62209 draft 0.9
(*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of [1] and [3].

Conformity

Based on the sample tests above, we certify that this item is in compliance with the uncertainty requirements of SAR measurements specified in standard [1] and draft standards [2] and [3].

Date 18.11.2001

Signature / Stamp Schmid & Partner Engineering AG
Zeughausstrasse 43, CH-8004 Zurich
Tel. +41 1 245 97 00, Fax +41 1 245 97 79

Doc No 881 – QD 000 P40 BA – B Page 1 (1)

Fig. 12: Certificate of conformity for the used SAM phantom

8.9 Pictures of the device under test

Fig. 13 – 20 show the device under test and the used accessories.

Fig. 13: Picture of the device under test

Fig. 14: Side view of the device.

Fig. 15: Used headset HHS-610.

Fig. 16: Used data cable DCA-500.

Fig. 17: Used camera IQP-500.

Fig. 18: Available headset HHS-500.

Fig. 19: Available headset HHS-510.

Fig. 20: Available data cable DCA 510.

8.10 Test Positions for the Device under Test

Fig. 21 – Fig. 31 shown the test positions for the SAR measurements.

Fig. 21: Cheek position, left side.

Fig. 22: Tilted position, left side.

Fig. 23: Cheek position, right side.

Fig. 24: Tilted position, right side.

Fig. 25: Cheek position, left side with camera.

Fig. 26: Tilted position, left side with camera.

Fig. 27: Cheek position, right side with camera.

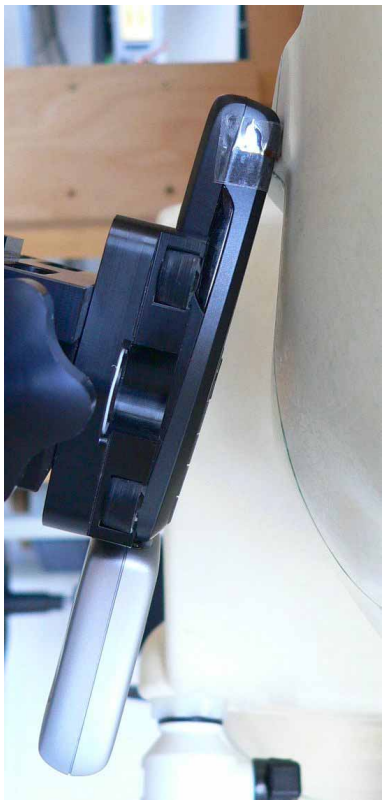

Fig. 28: Tilted position, right side with camera.

Fig. 29: Body worn configuration, GSM 1900 without accessory, antenna towards the phantom.

Fig. 30: Body worn configuration, GSM 1900, with headset, antenna towards the phantom.

Fig. 31: Body worn configuration, GPRS 1900 (Class 8) with data cable, antenna towards the phantom.

8.11 Pictures to demonstrate the required liquid depth

Fig. 32 show the liquid depth in the used SAM phantom.

Fig. 32: Liquid depth for PCS 1900 Head and Body measurements.

9 References

[OET 65] Federal Communications Commission: Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01), FCC, 2001.

[IEEE C95.1] 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., 1999.

[IEEE 1528-2003] IEEE Std 1528-2003: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques. 1528-2003, December 19, 2003, The Institute of Electrical and Electronics Engineers.

[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, 1994.

[DASY4] Schmid & Partner Engineering AG: DASY4 Manual. August 2004

[FCC 96-326] FCC 96-326, ET Docket No. 93-62, Report and Order, August 1, 1996