

Specific Absorption Rate (SAR) Test Report

for
Chi Mei Communications Systems, Inc
on the
CMCS Tri-Band GSM/GPRS Module
Model Number: Newton

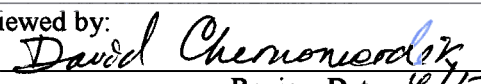
Test Report: 30229741
Date of Report: April 15, 2002

Job #: 3022974
Date of Test: April 8, 2002

Total No of Pages Contained in this Report: 38



NVLAP Laboratory Code 200201-0
Accredited for testing to FCC Parts 15

Tested by: 	Suresh kondapalli
Reviewed by: 	David Chernomordik, Ph.D., EMC Technical Manager

Review Date: 4/17/02

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1.0 JOB DESCRIPTION**1.1 Client Information**

The Newton has been tested at the request of:

Company: Chi Mei Communications Systems, Inc
11 F, No. 39, Chung Hua Road Sec. 1
chandler@cmcs.com.tw
Taipei, Taiwan 100
China

Name of contact: Mr. Chandler Liang
Telephone: +886-2-2370-8699, Ext 2233
Fax: +886-2-2370-8399

1.2 Equipment under test (EUT)**Product Descriptions:**

Equipment				CMCS Tri-Band GSM/GPRS Module			
Trade Name		Chi Mei Communications Systems, Inc		Model No:		Newton	
FCC ID		Not Labeled		S/N No.		Not Labeled	
Category		Portable		RF Exposure		Uncontrolled Environment	
Frequency Band		1800 – 1910 MHz		System		GSM/GPRS	

EUT Antenna Description			
Type	Monopole	Configuration	Fixed
Dimensions	N/A	Gain	0 dBi
Location	Internal		

Use of Product : Wireless Communication

Manufacturer: Chi Mei Communications Systems, Inc

Production is planned: [X] Yes, [] No

EUT receive date: April 8, 2002

EUT received condition: Good operating condition prototype.

Test start date: April 8, 2002

Test end date: April 8, 2002

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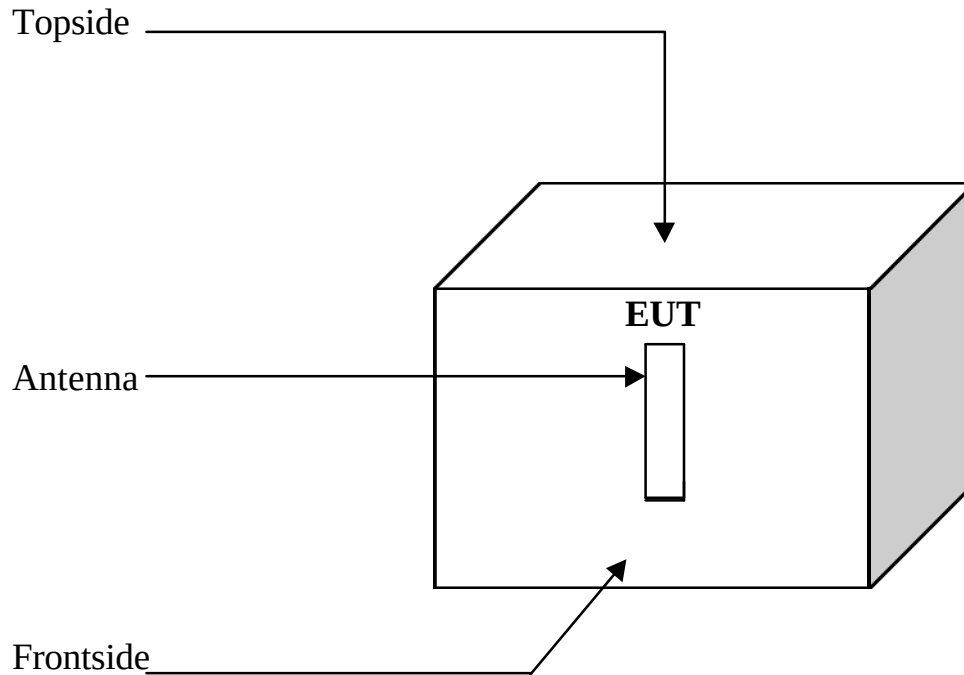
1.3 Test plan reference

FCC rule part 2.1093, FCC Docket 96-326 & Supplement C to OET Bulletin 65

1.4 System test configuration

1.4.1 System block diagram & Support equipment

None, the EUT is a stand-alone unit.



S = Shielded	F = With Ferrite
U = Unshielded	M = Length in Meters

1.4.2 Test Position

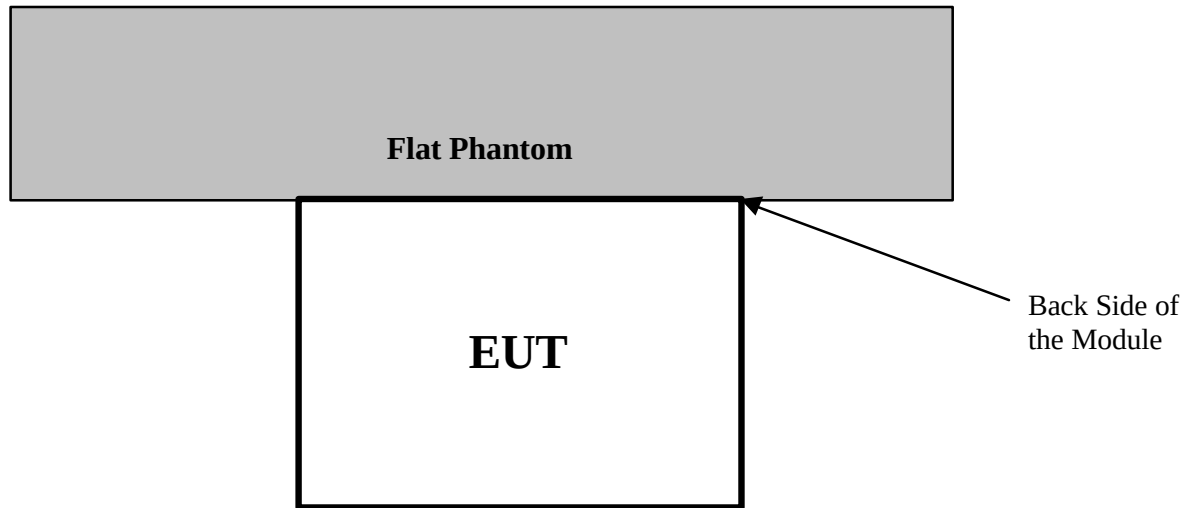


Figure 1: Module Touching Phantom, Antenna Horizontal

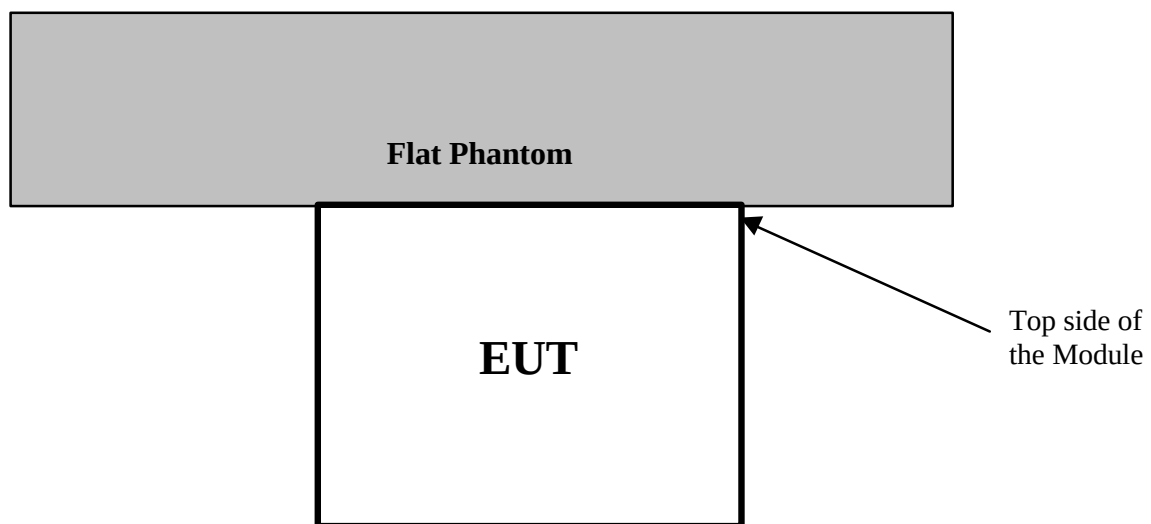


Figure 2: Module Touching Phantom, Antenna Vertical

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1.4.3 Test Condition

During tests the worst case data (max RF coupling) was determined with following conditions:

EUT Antenna	Fixed length	Orientation	Vertical & Horizontal
Usage	Stand alone	Distance between antenna axis at the joint and the liquid surface:	Configuration A 32.3 mm Configuration B 15.2 mm
Simulating human Body/hand	Body	EUT Battery	Three “C” type Alkaline batteries
Conducted Peak output Power	Frequency MHz		dBm
	1850		28.77
	1880		28.58
	1910		28.81

The EUT was tested at lowest, middle and highest operating channels defined by manufacturer.

1.5 Modifications required for compliance

Intertek Testing Services implemented no modifications.

1.6 Additions, deviations and exclusions from standards

No additions, deviations or exclusions have been made from standard.

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2.0 SAR EVALUATION**2.1 SAR Limits**

The following FCC limits for SAR apply to devices operate in General Population/Uncontrolled Exposure environment:

EXPOSURE (General Population/Uncontrolled Exposure environment)	SAR (W/kg)
Average over the whole body	0.08
Spatial Peak (1g)	1.60
Spatial Peak for hands, wrists, feet and ankles (10g)	4.00

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2.2 Configuration Photographs

SAR Measurement Test Setup

Configuration A - Antenna Horizontal



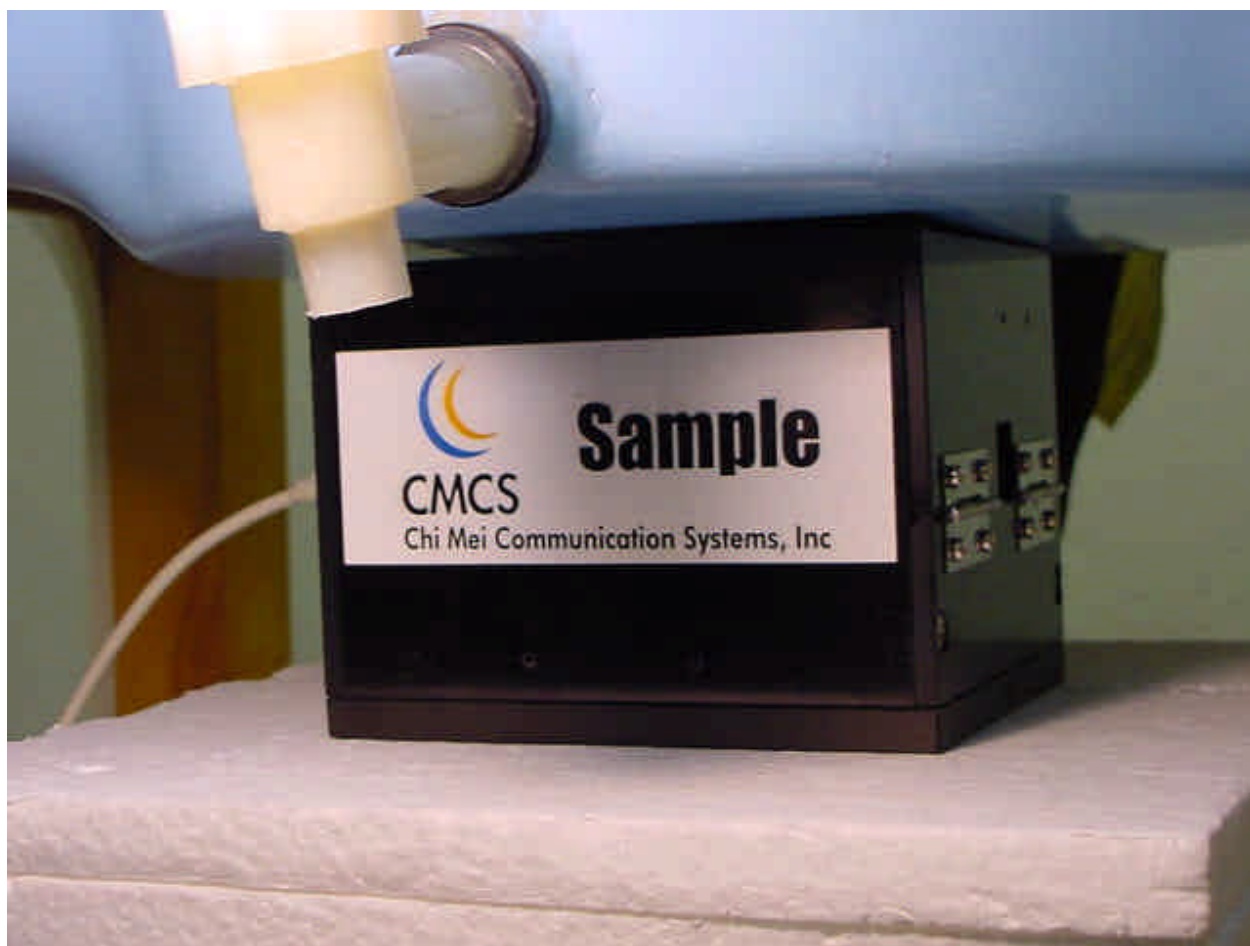
Chi Mei Communications Systems, Inc, Model No: Newton

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2.2 Configuration Photographs (Continued)

SAR Measurement Test Setup

Configuration B - Antenna Vertical



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2.2 Configuration Photographs (Continued)

EUT Photo



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2.2 Configuration Photographs (Continued)

EUT Photo



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2.3 System Verification

Prior to the assessment, the system was verified to the $\pm 5\%$ of the specifications by using the system validation kit. The validation was performed at 1800 MHz.

Validation kit	Targeted SAR _{1g} (mW/g)	Measured SAR _{1g} (mW/g)
D1800V2, S/N #: 214	9.77	9.46

See Plot # 5

2.4 Evaluation Procedures

The SAR evaluation was performed with the following procedures:

- a. SAR was measured at a fixed location above the reference point and used as a reference value for the assessing the power drop.
- b. The SAR distribution at the exposed side of the flat Phantom was measured at a distance of 30 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20 mm x 20 mm. Based on this data, the area of the maximum absorption was determined by spline interpolation.
- c. Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure:
 - i) The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measurement point is 1.6 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in Z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
 - ii) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum, the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3-D spline interpolation algorithm. The 3-D spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y and z directions). The volume was integrated with the trapezoidal algorithm. 1000 points (10 x 10 x 10) were interpolated to calculate the average.
 - iii) All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
- d. Re-measurements of the SAR value at the same location as in step a. above. If the value changed by more than 5 %, the evaluation was repeated.

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2.5 Test Results

The results on the following page(s) were obtained when the device was tested in the condition described in this report. Detail measurement data and plots, which reveal information about the location of the maximum SAR with respect to the device, are reported in Appendix A.

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Measurement Results

Trade Name:	Chi Mei Communications	Model No.:	Newton
Serial No.:	Not Labeled	Test Engineer:	Suresh kondapalli

TEST CONDITIONS			
Ambient Temperature	23.5 °C	Relative Humidity	56 %
Test Signal Source	Test Mode	Signal Modulation	GSM
Output Power Before SAR Test	See page 6	Output Power After SAR Test	No change
Test Duration	23 Min. each test	Number of Battery Change	New battery every scan

Configuration B EUT Position: Module touching Phantom Antenna Vertical					
Channel MHz	Operating Mode	Crest Factor	Measured SAR _{1g} (mW/g)	Limit SAR _{1g} (mW/g)	Plot Number
1880	GSM	8	0.0155	1.6	1

Configuration A EUT Position: Module touching Phantom Antenna Horizontal					
Channel MHz	Operating Mode	Crest Factor	Measured SAR _{1g} (mW/g)	Limit SAR _{1g} (mW/g)	Plot Number
1850	GSM	8	0.0219	1.6	2
1880	GSM	8	0.0219	1.6	3
1910	GSM	8	0.0214	1.6	4

System Verification					
Frequency MHz	Operating Mode	Crest Factor	Measured SAR _{10g} (mW/g)	Target SAR _{10g} (mW/g)	Plot Number
1800	CW	1	9.46	4.96	5

Note: a) Worst case data were reported
 b) Uncertainty of the system is not included

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3.0 TEST EQUIPMENT

3.1 Equipment List

The Specific Absorption Rate (SAR) tests were performed with the SPEAG model DASY 3 automated near-field scanning system, which is package, optimized for dosimetric evaluation of mobile radio [3].

The following major equipment/components were used for the SAR evaluations:

SAR Measurement System			
EQUIPMENT	SPECIFICATIONS	S/N #	CAL. DATE
Robot	Stäubli RX60L	597412-01	N/A
	Repeatability: $\pm 0.025\text{mm}$ Accuracy: 0.806×10^{-3} degree Number of Axes: 6		
E-Field Probe	ET3DV6	1576	02/27/02
	Frequency Range: 10 MHz to 6 GHz Linearity: ± 0.2 dB Directivity: ± 0.1 dB in brain tissue		
Data Acquisition	DAE3	317	N/A
	Measurement Range: $1\mu\text{V}$ to $>200\text{mV}$ Input offset Voltage: $< 1\mu\text{V}$ (with auto zero) Input Resistance: 200 M		
Phantom	Generic Twin V3.0	N/A	N/A
	Type: Generic Twin, Homogenous Shell Material: Fiberglass Thickness: 2 ± 0.1 mm Capacity: 20 liter Ear spacer: 4 mm (between EUT ear piece and tissue simulating liquid)		
Simulated Tissue	Mixture	N/A	04/08/02
	Please see section 6.2 for details		
Power Meter	HP 435A w/ 8481H sensor	3607U00673	08/01/01
	Frequency Range: 100kHz to 18 GHz Power Range: $300\mu\text{W}$ to 3W		

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3.2 Muscle Tissue Simulating Liquid

Muscle Ingredients Frequency (1800 MHz)	
DGBE Dilethylene Glycol	44.92%
Toniton X-100 (Polyethylene Glycol Mono) Ether	0.1%
Salt	0.18%
Water	54.8%

The dielectric parameters were verified prior to assessment using the HP 85070A dielectric probe kit and the HP 8753C network Analyzer. The dielectric parameters were:

Frequency (MHz)	ϵ_r *	s *(mho/m)	r ** (kg/m³)
1800	55.8	1.49	1000

* Worst case uncertainty of the HP 85070A dielectric probe kit

** Worst case assumption

3.3 E-Field Probe Calibration

The manufacturer in the TEM cells ifi 110 calibrated probes. To ensure consistency, a strict protocol was followed. The conversion factor (ConF) between this calibration and the measurement in the tissue simulation solution was performed by comparison with temperature measurement and computer simulations. Probe calibration factors are included in Appendix C.

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3.4 Measurement Uncertainty

The uncertainty budget has been determined for the DASY3 measurement system according to the NIS81 [5] and the NIST 1297 [6] documents and is given in the following table. The extended uncertainty (K=2) was assessed to be 23.5 %

UNCERTAINTY BUDGET				
Uncertainty Description	Error	Distrib.	Weight	Std.Dev.
Probe Uncertainty				
Axial isotropy	±0.2 dB	U-shape	0.5	±2.4 %
Spherical isotropy	±0.4 dB	U-shape	0.5	±4.8 %
Isotropy from gradient	±0.5 dB	U-shape	0	
Spatial resolution	±0.5 %	Normal	1	±0.5 %
Linearity error	±0.2 dB	Rectang.	1	±2.7 %
Calibration error	±3.3 %	Normal	1	±3.3 %
SAR Evaluation Uncertainty				
Data acquisition error	±1 %	Rectang.	1	±0.6 %
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %
Conductivity assessment	±10 %	Rectang.	1	±5.8 %
Spatial Peak SAR Evaluation Uncertainty				
Extrapol boundary effect	±3 %	Normal	1	±3 %
Probe positioning error	±0.1 mm	Normal	1	±1 %
Integrat. and cube orient	±3 %	Normal	1	±3 %
Cube shape inaccuracies	±2 %	Rectang.	1	±1.2 %
Device positioning	±6 %	Normal	1	±6 %
Combined Uncertainties				±11.7 %

3.5 Measurement Tractability

All measurements described in this report are traceable to National Institute of Standards and Technology (NIST) standards or appropriate national standards.

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4.0 WARNING LABEL INFORMATION - USA

See users manual.

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5.0 REFERENCES

- [1] ANSI, *ANSI/IEEE C95.1-1991: 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 Radiofrequency Electromagnetic Fields”, OET Bulletin 65, FCC, Washington, D.C. 20554, 1997
- [3] Thomas Schmid, Oliver Egger, and Niels Kuster, “Automated E-field scanning system for dosimetric assessments”, *IEEE Transaction on Microwave Theory and Techniques*, vol. 44, pp. 105-113, Jan. 1996.
- [4] Niels Kuster, Ralph Kastle, and Thomas Schmid, “Dosimetric evaluation of mobile communications equipment with know precision”, *IEICE Transactions on Communications*, vol. E80-B, no. 5, pp.645-652, May 1997.
- [5] NIS81, NAMAS, “The treatment of uncertainty in EMC measurement”, Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddinton, Middlesex, England, 1994.
- [6] Barry N. Taylor and Chris E. Kuyatt, “Guidelines for evaluating and expressing the uncertainty of NIST measurement results”, Tech. Rep., National Institute of Standards and Technology, 1994.

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5.0 DOCUMENT HISTORY

Revision/ Job Number	Writer Initials	Date	Change
1.0 /3012586	SS	April 15, 2002	Original document

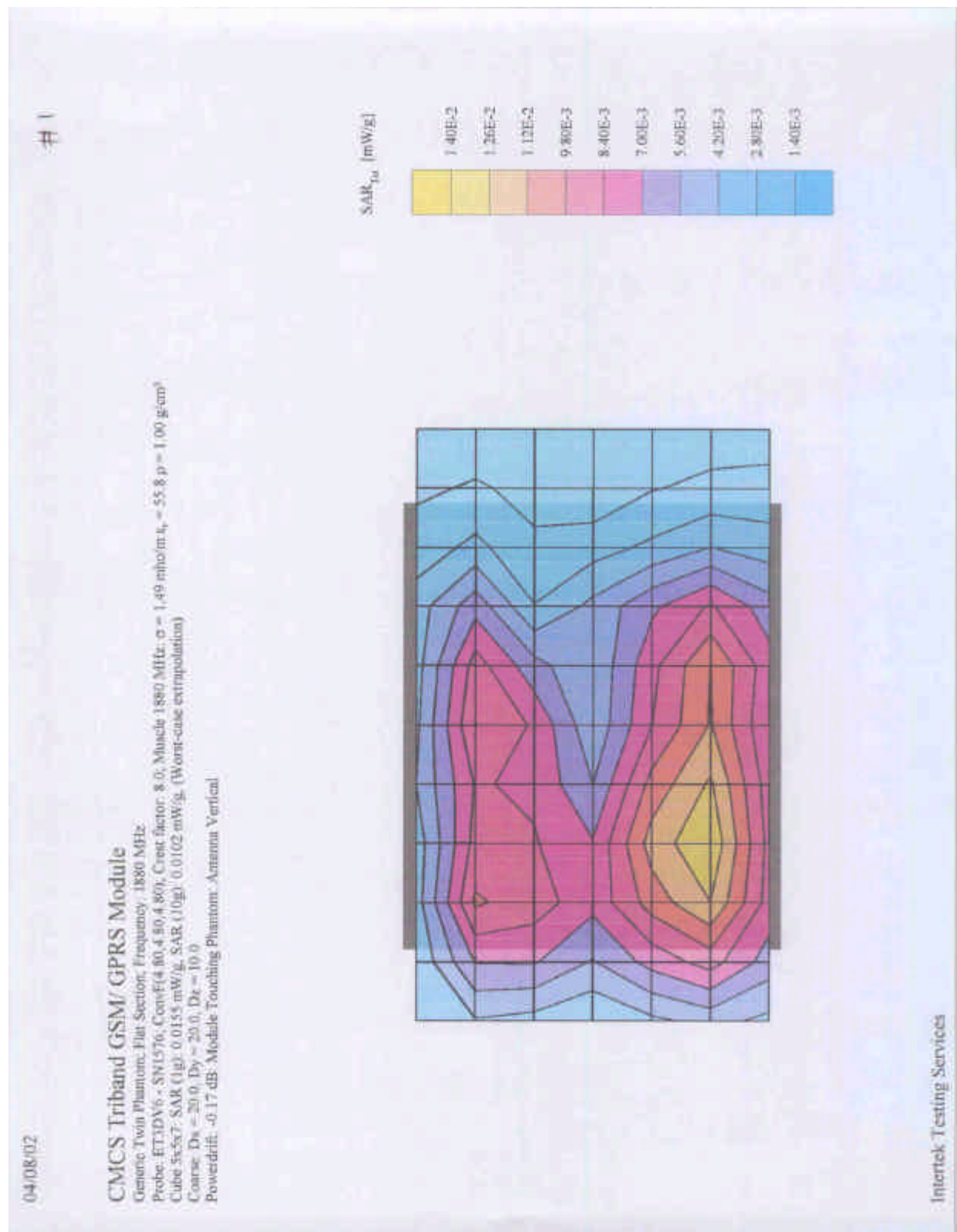
Chi Mei Communications Systems, Inc, Model No: Newton

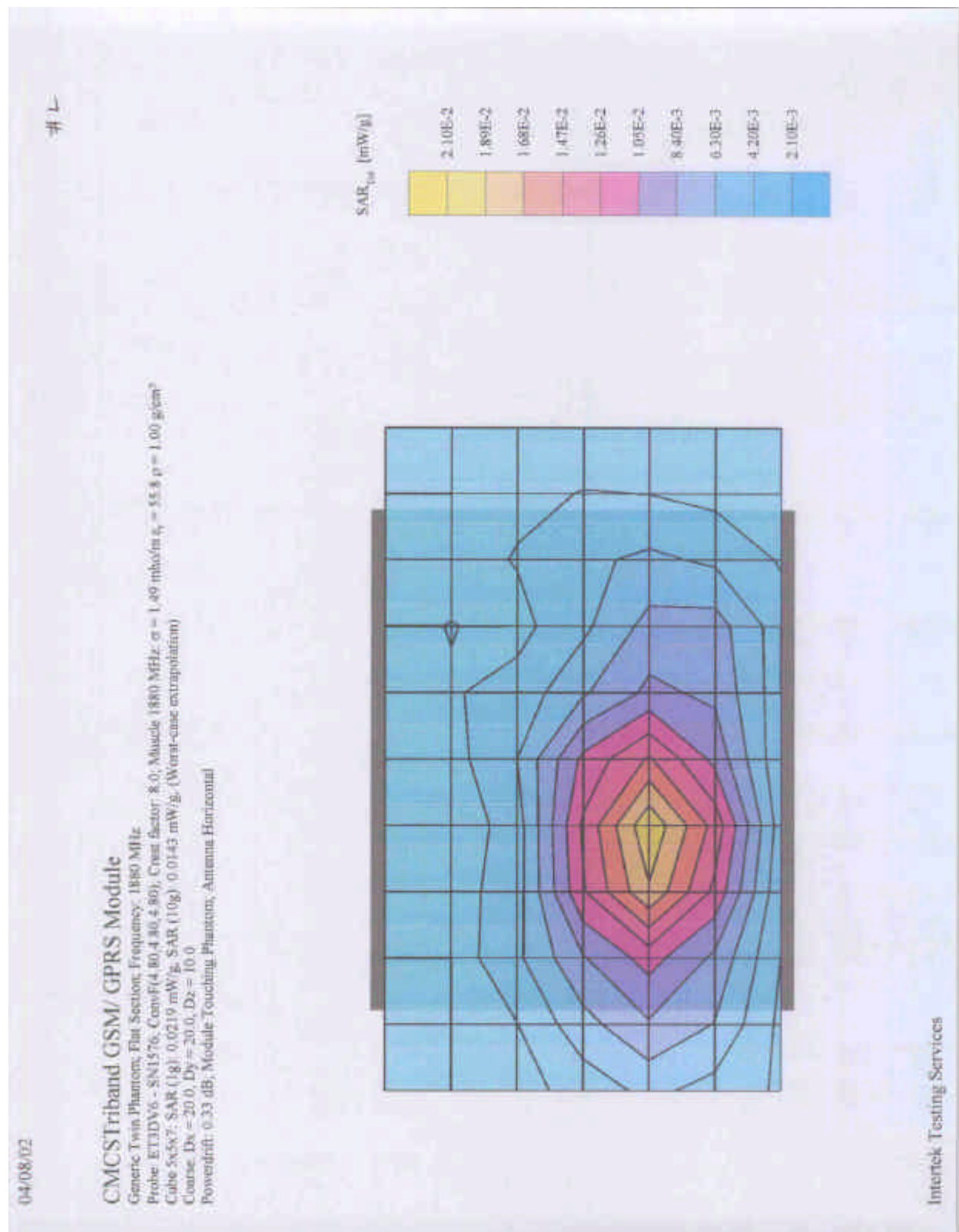
Date of Test: April 8, 2002

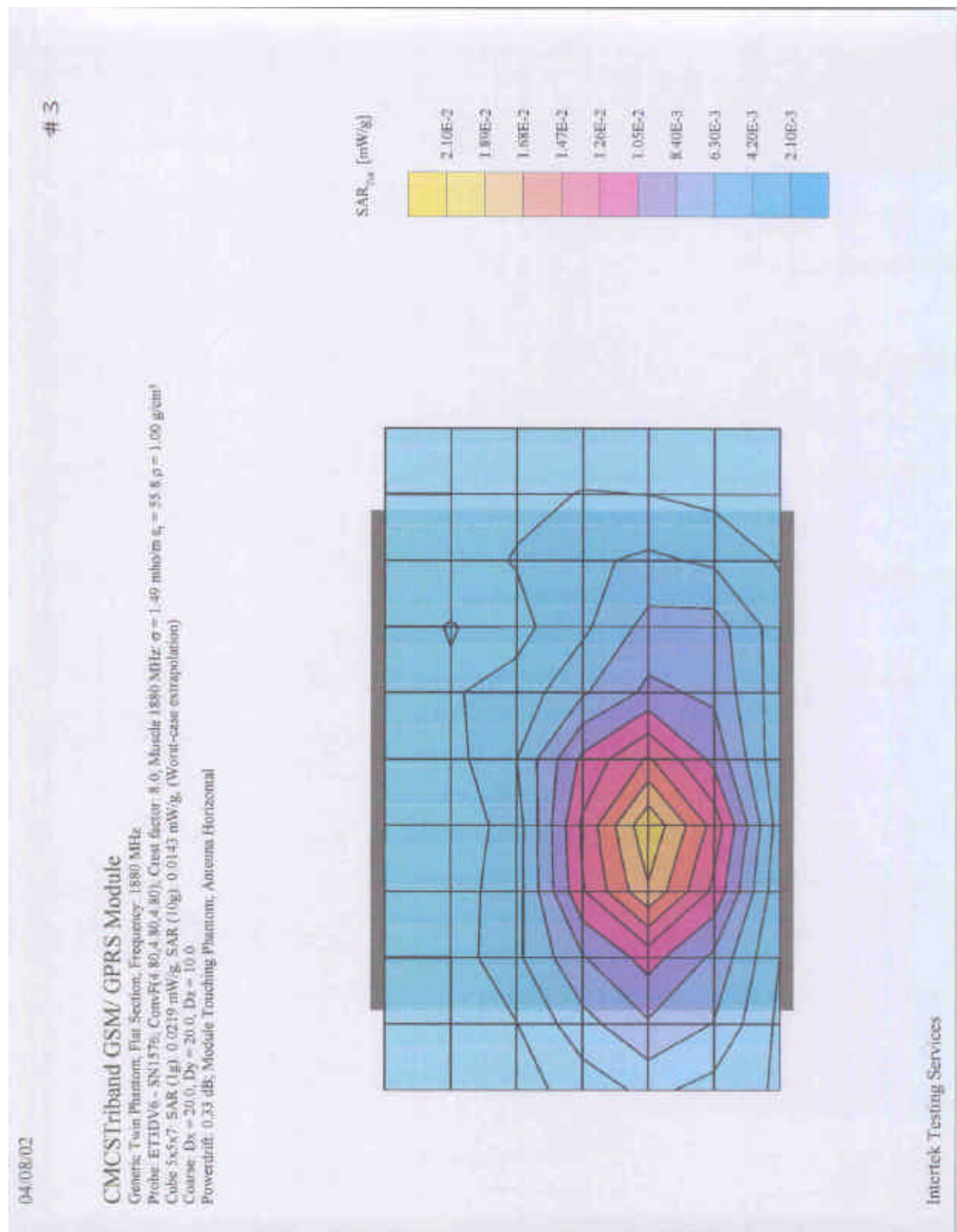
APPENDIX A - SAR Evaluation Data

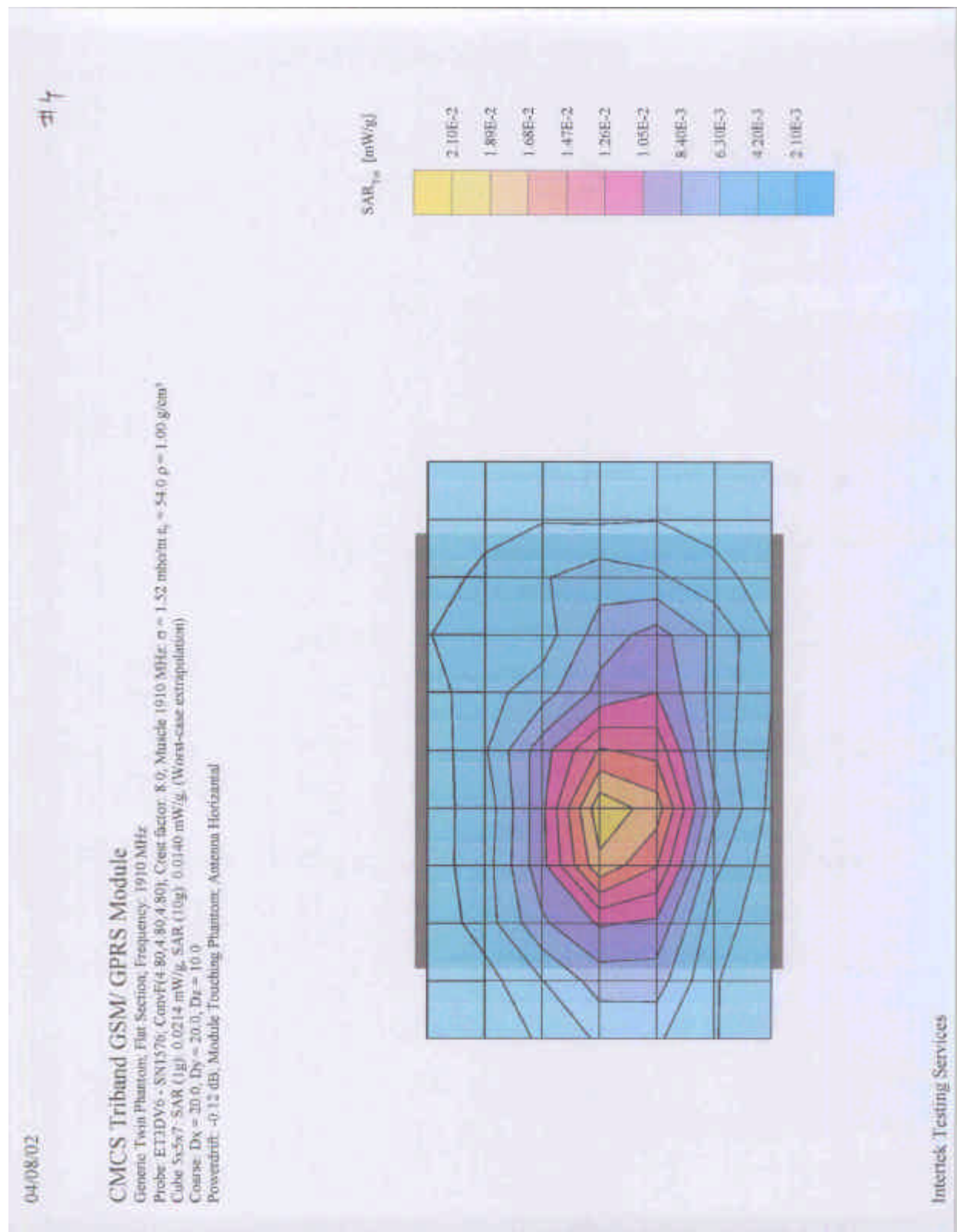
Please note that the graphical visualization of the phone position onto the SAR distribution gives only limited information on the current distribution of the device, since the curvature of the head results in graphical distortion. Full information can only be obtained either by H-field scans in free space or SAR evaluation with a flat phantom.

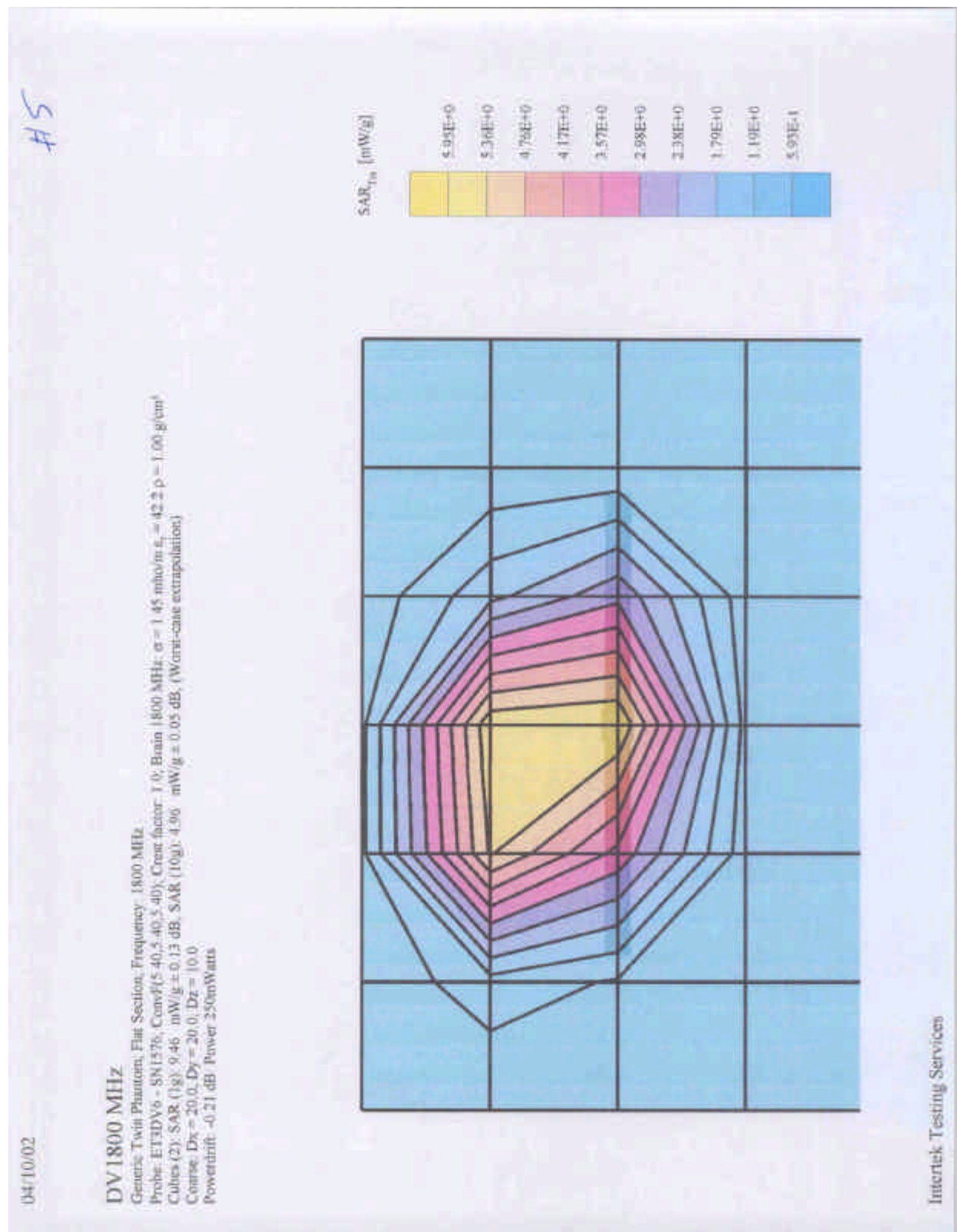
Power drift is the measurement of power drift of the device over one complete SAR scan.











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APPENDIX B - E-Field Probe Calibration Data

See attached.

**Schmid & Partner
Engineering AG**

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

Calibration Certificate

Dosimetric E-Field Probe

Type:

ET3DV6

Serial Number:

1576

Place of Calibration:

Zurich

Date of Calibration:

February 27, 2002

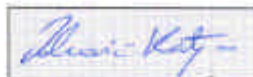
Calibration Interval:

12 months

Schmid & Partner Engineering AG hereby certifies, that this device has been calibrated on the date indicated above. The calibration was performed in accordance with specifications and procedures of Schmid & Partner Engineering AG.

Wherever applicable, the standards used in the calibration process are traceable to international standards. In all other cases the standards of the Laboratory for EMF and Microwave Electronics at the Swiss Federal Institute of Technology (ETH) in Zurich, Switzerland have been applied.

Calibrated by:



Approved by:



**Schmid & Partner
Engineering AG**

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

Probe ET3DV6

SN:1576

Manufactured:	April 6, 2001
Last calibration:	April 20, 2001
Recalibrated:	February 27, 2002

Calibrated for System DASY3

ET3DV6 SN:1576

February 27, 2002

DASY3 - Parameters of Probe: ET3DV6 SN:1576

Sensitivity in Free Space

NormX	1.77 $\mu\text{V}/(\text{V/m})^2$
NormY	1.81 $\mu\text{V}/(\text{V/m})^2$
NormZ	1.76 $\mu\text{V}/(\text{V/m})^2$

Diode Compression

DCP X	98	mV
DCP Y	98	mV
DCP Z	98	mV

Sensitivity in Tissue Simulating Liquid

Head	900 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.97 \pm 5\%$ mho/m
Head	835 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.90 \pm 5\%$ mho/m
ConvF X	7.0 $\pm 9.5\%$ (k=2)	Boundary effect:	
ConvF Y	7.0 $\pm 9.5\%$ (k=2)	Alpha	0.30
ConvF Z	7.0 $\pm 9.5\%$ (k=2)	Depth	2.51
Head	1800 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
Head	1800 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
ConvF X	5.4 $\pm 9.5\%$ (k=2)	Boundary effect:	
ConvF Y	5.4 $\pm 9.5\%$ (k=2)	Alpha	0.45
ConvF Z	5.4 $\pm 9.5\%$ (k=2)	Depth	2.30

Boundary Effect

Head	900 MHz	Typical SAR gradient: 5 % per mm		
Probe Tip to Boundary		1 mm	2 mm	
SAR _{iso} [%]	Without Correction Algorithm	7.6	4.3	
SAR _{iso} [%]	With Correction Algorithm	0.3	0.5	
Head	1800 MHz	Typical SAR gradient: 10 % per mm		
Probe Tip to Boundary		1 mm	2 mm	
SAR _{iso} [%]	Without Correction Algorithm	9.7	6.6	
SAR _{iso} [%]	With Correction Algorithm	0.2	0.3	

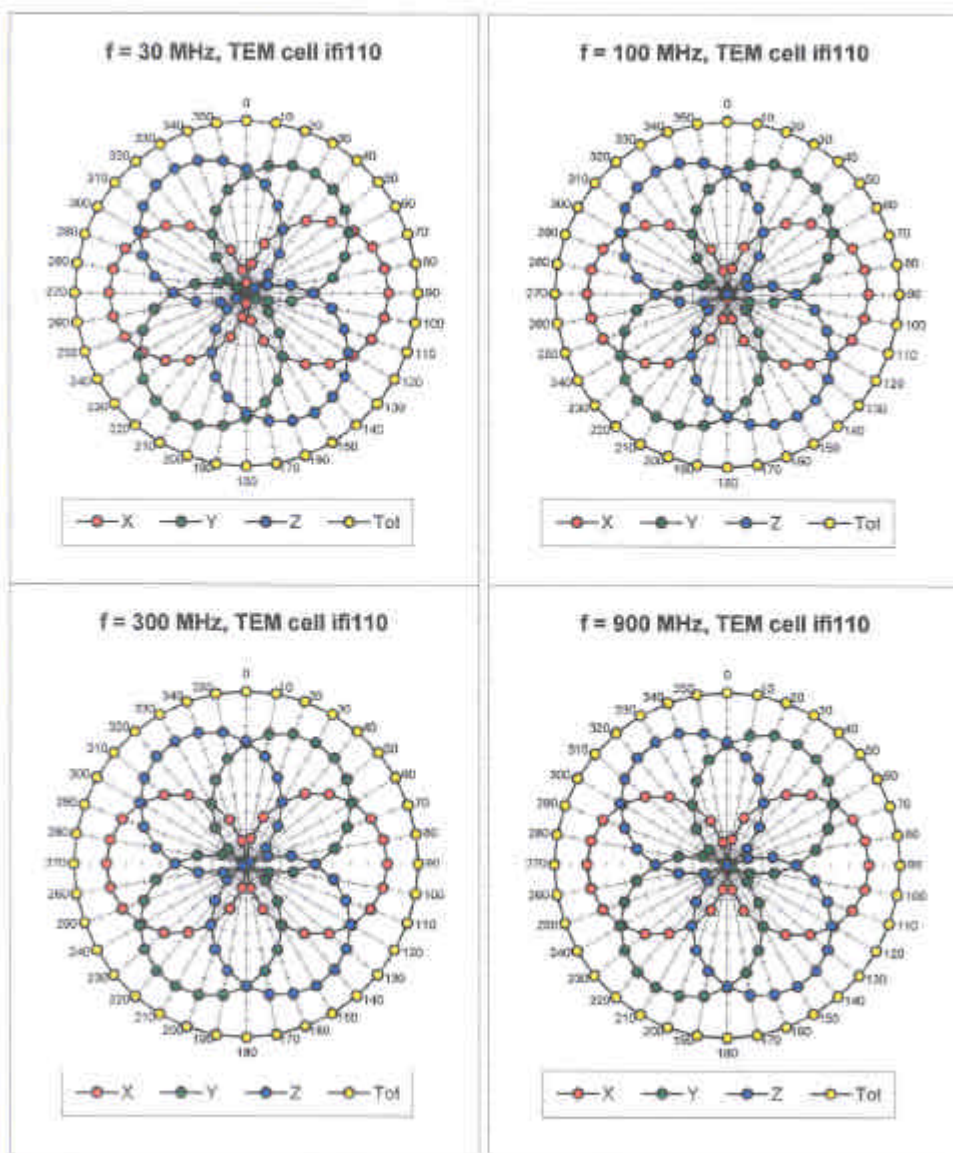
Sensor Offset

Probe Tip to Sensor Center	2.7	mm
Optical Surface Detection	1.9 ± 0.2	mm

ET3DV6 SN:1576

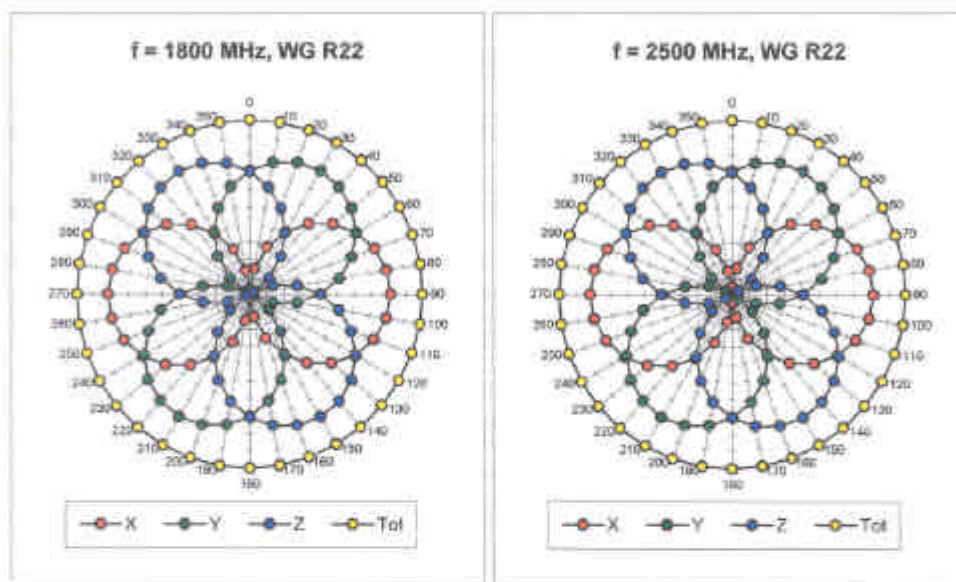
February 27, 2002

Receiving Pattern (ϕ), $\theta = 0^\circ$

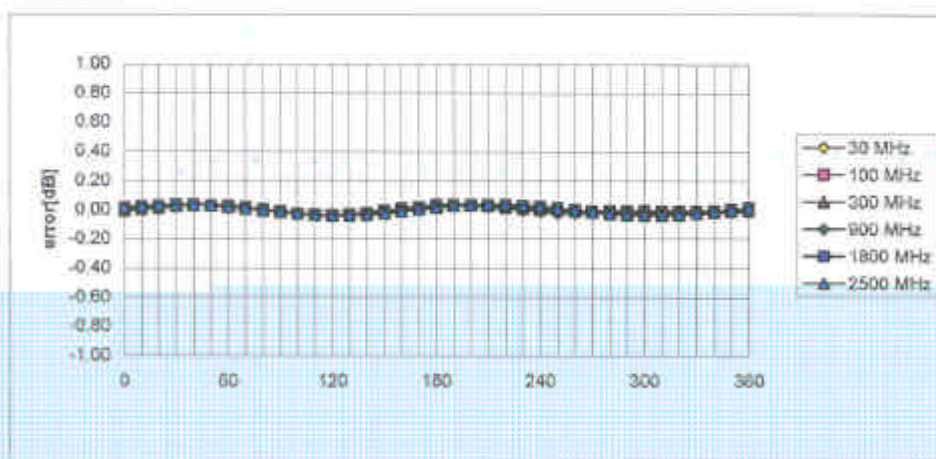


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Isotropy Error (ϕ), $\theta = 0^\circ$

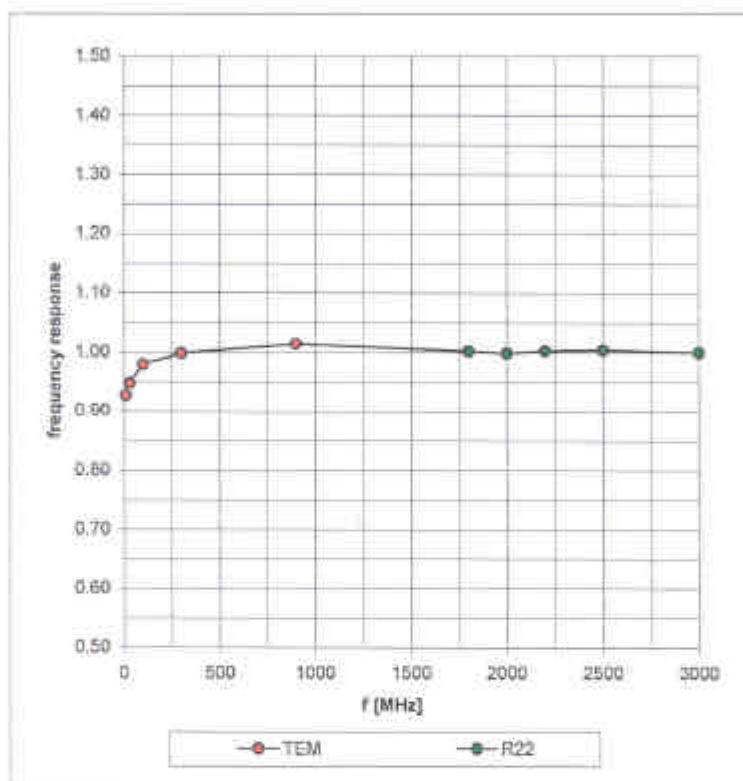


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Frequency Response of E-Field

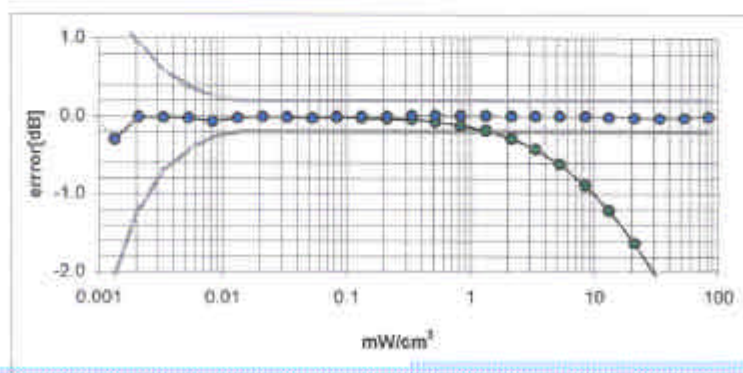
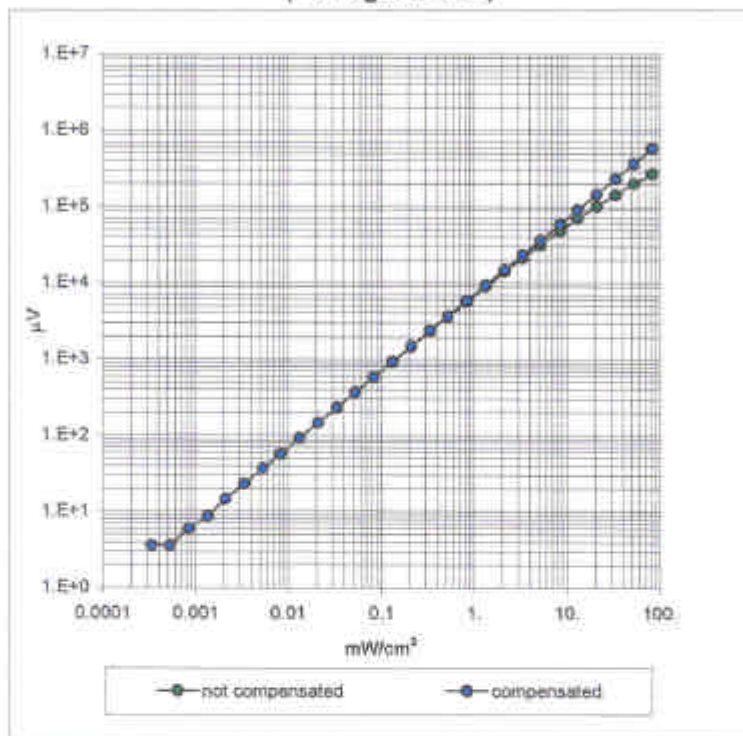
(TEM-Cell:ifi110, Waveguide R22)



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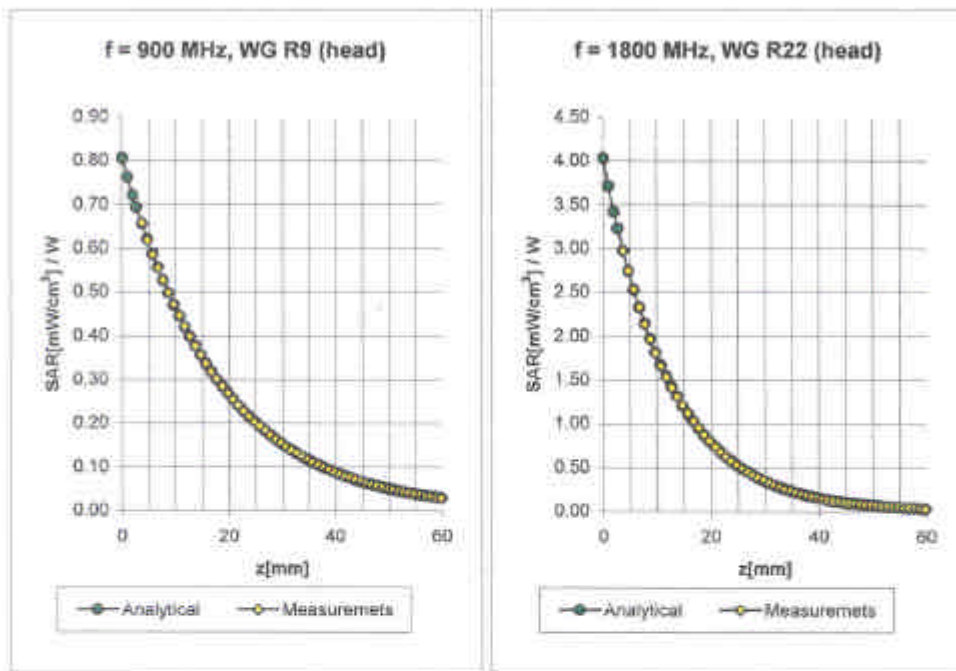
Dynamic Range $f(\text{SAR}_{\text{brain}})$ (Waveguide R22)



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Conversion Factor Assessment



Head	900 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.97 \pm 5\%$ mho/m
Head	835 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.90 \pm 5\%$ mho/m
	ConvF X	$7.0 \pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	$7.0 \pm 9.5\%$ (k=2)	Alpha 0.30
	ConvF Z	$7.0 \pm 9.5\%$ (k=2)	Depth 2.51
Head	1800 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
Head	1900 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
	ConvF X	$5.4 \pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	$5.4 \pm 9.5\%$ (k=2)	Alpha 0.45
	ConvF Z	$5.4 \pm 9.5\%$ (k=2)	Depth 2.30

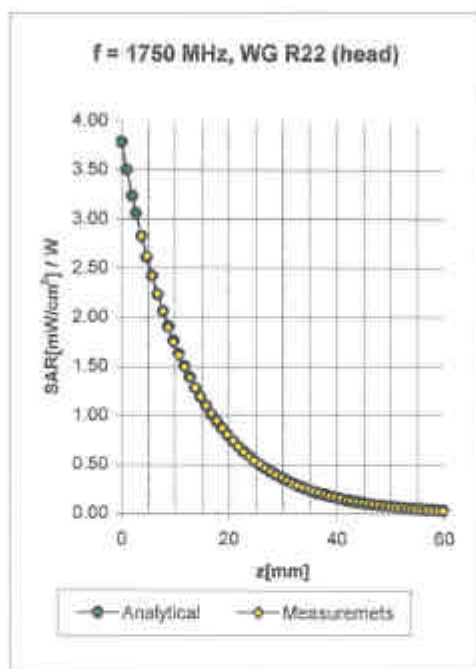
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Conversion Factor Assessment

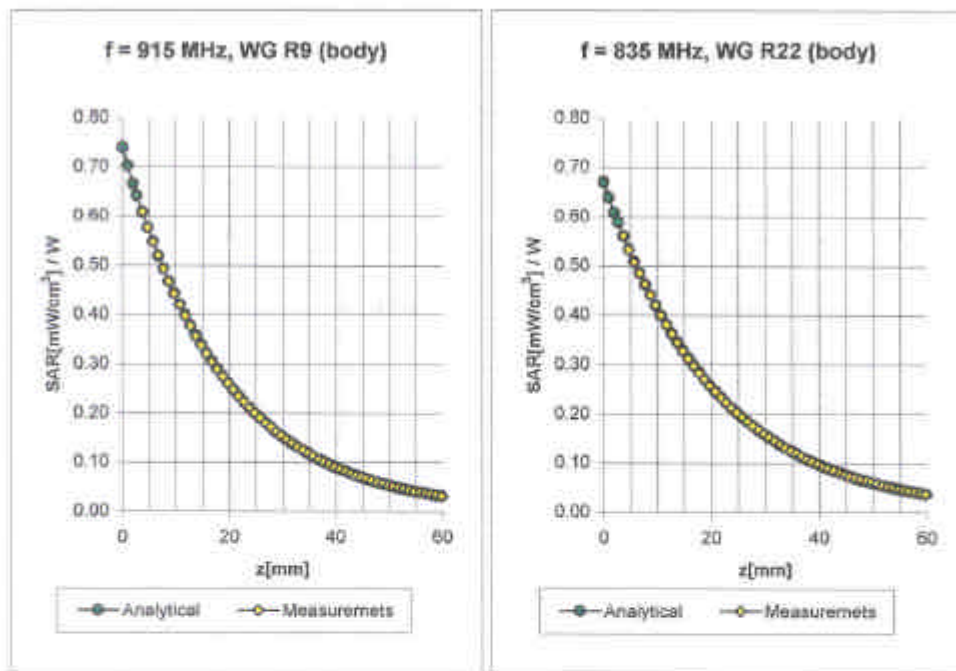


Head	1750 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\% \text{ mho/m}$
ConvF X	5.4 $\pm$ 8.9% (k=2)	Boundary effect: Alpha 0.45 Depth 2.27	
ConvF Y	5.4 $\pm$ 8.9% (k=2)		
ConvF Z	5.4 $\pm$ 8.9% (k=2)		

ET3DV6 SN:1576

February 27, 2002

Conversion Factor Assessment

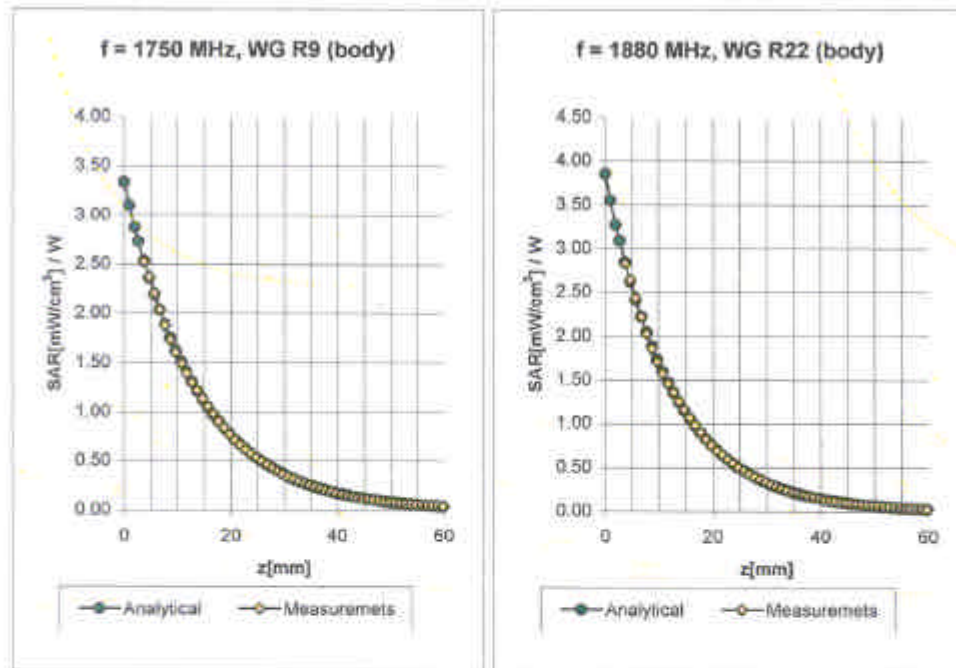


Body	915 MHz	$\epsilon_r = 55.0 \pm 5\%$	$\sigma = 1.06 \pm 5\% \text{ mho/m}$
ConvF X	6.7 $\pm 8.9\%$ (k=2)	Boundary effect:	
ConvF Y	6.7 $\pm 8.9\%$ (k=2)	Alpha	0.45
ConvF Z	6.7 $\pm 8.9\%$ (k=2)	Depth	2.01
Body	835 MHz	$\epsilon_r = 55.2 \pm 5\%$	$\sigma = 0.97 \pm 5\% \text{ mho/m}$
ConvF X	6.7 $\pm 8.9\%$ (k=2)	Boundary effect:	
ConvF Y	6.7 $\pm 8.9\%$ (k=2)	Alpha	0.34
ConvF Z	6.7 $\pm 8.9\%$ (k=2)	Depth	2.37

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Conversion Factor Assessment



Body 1750 MHz $\epsilon_r = 53.3 \pm 5\%$ $\sigma = 1.52 \pm 5\%$ mho/m

ConvF X	5.1 $\pm 8.9\%$ (k=2)	Boundary effect:
ConvF Y	5.1 $\pm 8.9\%$ (k=2)	Alpha 0.51
ConvF Z	5.1 $\pm 8.9\%$ (k=2)	Depth 2.31

Body 1880 MHz $\epsilon_r = 53.3 \pm 5\%$ $\sigma = 1.52 \pm 5\%$ mho/m

ConvF X	4.8 $\pm 8.9\%$ (k=2)	Boundary effect:
ConvF Y	4.8 $\pm 8.9\%$ (k=2)	Alpha 0.63
ConvF Z	4.8 $\pm 8.9\%$ (k=2)	Depth 2.10

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Deviation from Isotropy in HSL

Error (θ, ϕ), $f = 900$ MHz

