

Report

Dosimetric Assessment of the Prodigi Tablet PGI-100 from HumanWare (FCC ID: XT5PGITAB) (IC: 8670A-PGITAB)

According to the FCC Requirements

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This version supersedes all previous versions of this report. The test results only relate to the items tested.

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Executive Summary

The Prodigy Tablet PGI-100 is a new phablet computer (Portable Device) from HumanWare operating in the 2450 MHz frequency range with an overall diagonal dimension of 17.5 cm. The device has an integrated antenna and work in IEEE 802.11 b/g and Bluetooth standards. The Prodigy Tablet PGI-100 has no proximity sensor for any power reduction. According KDB 447498 D01, IMST has conducted SAR measurements for body worn and extremity exposure configuration.

The objective of the measurements done by IMST was the dosimetric assessment of one device according the applicable KDB. For IEEE 802.11 b/g SAR assessment, a special test software was used to set the device to a specific frequency and maximum output power with a specific data rate. The examinations have been carried out with the dosimetric assessment system „DASY4“.

The measurements were made according to the 47 CFR § 2.1093 [47CFR] for evaluating compliance of mobile and portable devices with FCC limits for human exposure (general population) to radiofrequency emissions and IEEE 1528-2013 [IEEE1528-2013].

Additional information and guidelines given by the following FCC documents were used:

- SAR Measurement Requirements for 100 MHz to 6 GHz [KDB 865664 D01 v01r03]
- Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies [KDB 447498 D01 v05r02]
- SAR Evaluation Considerations for Wireless Handsets [KDB 648474 D04 v01r02]
- SAR Measurement Procedures for 802.11 a/b/g Transmitters [KDB 248227 Rev. 1.2]

All measurements have been performed in accordance to the recommendations given by SPEAG.

Compliance Statement

The assessed SAR values for Prodigy Tablet PGI-100 phablet computer from HumanWare (FCC ID: XT5PGITAB; IC: 8670A-PGITAB) are in compliance with the SAR limits over any 1g and 10g tissue according to:

- 47 CFR § 2.1093 [47CFR]
- ANSI / IEEE C95.1-1999 [IEEE C95.1-1999]

The measured SAR results are shown in Table 11 - 12.

WORST CASE SAR RESULTS								
Band	Freq. [MHz]	CH	Phantom Configuration		Fig. No	Reported SAR [W/kg]	SAR Limit [W/kg]	
IEEE 802.11 b	2437	6	Body	Right Edge	13	0.115 (1g)	1.6	PASS
IEEE 802.11 b	2437	6	Extremity	Right Edge	13	0.029 (10g)	4.0	PASS

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Subject of Investigation

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Fig. 1: Picture of the device under test.



Fig. 2: Antenna location and separation distances.

The objective of the measurements done by IMST was the dosimetric assessment of one device according the applicable KDB. For IEEE 802.11 b/g SAR assessment, a special test software was used to set the device to a specific frequency and maximum output power with a specific data rate. The examinations have been carried out with the dosimetric assessment system „DASY4“.

1 FCC Exposure Criteria

In the USA the FCC exposure criteria [KDB 865664] are based on the withdrawn IEEE Standard C95.1-1999 [IEEE C95.1-1999].

In this report the comparison between the FCC 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}) resp. 10 g (SAR_{10g}) with the shape of a cube.

Rule	Body SAR Limit 1g [W/kg]	Extremity SAR Limit 10g [W/kg]
47 CFR § 2.1093 (d)(2)	1.6	4.0

Table 1: Relevant spatial peak SAR limit averaged over a mass of 1 g and 10 g.

1.1 Distinction Between Exposed Population, Duration of Exposure and Frequencies

The American Standard [IEEE C95.1-1999] 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.

1.2 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:

$$SAR = \sigma \frac{E^2}{\rho} = c \frac{\partial T}{\partial t} \Big|_{t \rightarrow 0+} \quad (1)$$

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 The FCC Measurement Procedure

2.1 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. All tests have been conducted according the latest version of all relevant KDBs.

2.2 SAR Testing for Phablet Computers according KDB 648474 D04

Due to its size, according KDB 648474 D04 this device is defined as a phablet computer. According the applicable UMPC mini-tablets SAR procedure the normal required head and / or body-worn accessory SAR test procedure for handsets, including hotspot mode, must be applied. The UMPC mini-tablet procedures must also be applied to test the SAR of all surfaces and edges with an antenna located at ≤ 25 mm from that surface or edge, in direct contact with a flat phantom, for 10-g extremity SAR according to the body-equivalent tissue dielectric parameters in KDB 865664 to address interactive hand use exposure conditions. Additionally the hotspot mode and simultaneous transmission considerations under chapter 1.5) of KDB 648474 needs to be respected.

2.3 Extremity exposure conditions

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions; i.e. hands, wrist, feet and ankles, may require extremity SAR evaluation according 4.2.3 of KDB 447498 D01.

2.4 Additional Test Positions due to Proximity Sensor Consideration

The normal tablet procedure for proximity sensor consideration in KDB 616217 only applies when the overall diagonal dimension of the device is > 20 cm.

2.5 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.

2.6 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. For phablet computers additionally the configurations according applicable KDBs needs to be considered.

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 resp. that channel with the highest output power for each test configuration is < 0.4 W/kg, testing at the high and low channels is optional.

2.7 Additional Information for 802.11 a/b/g Transmitters

In May 2007 the FCC published the revised issue of the SAR Measurement Procedures for 802 a/b/g transmitters to support the SAR measurements for demonstrating compliance with the FCC RF exposure guidelines. Additional information were required to establish specific device operating configurations to use during the measurements since the specific signal modulations, data rates, network conditions and other parameters were not considered within the current SAR measurement procedures (FCC, IEEE-1528).

Following the most important differences compared to the common SAR measurements of e.g. mobile phones working in the GSM or PCS standards were listed:

- Using of chipset based test mode software to ensure consistent and reliable results
- If the device supports switched diversity, the SAR should be measured with only one antenna transmitting (with fixed modulation and data rate) at a time
- The SAR is measured for the “default test channels” listed below as given by the FCC
- SAR measurements for 802.11 g channels when the maximum avg output power is less than ≥ 0.25 dB higher than the values for the corresponding 802.11b channels
- The avg. output power for 802.11a should be measured on all channels in each frequency band
- If the channel with the maximum avg. output power is not included in the default test channels, this channel should be tested instead of an adjacent default test channel
- For multiple channel bandwidth configurations, the configuration with the highest output power limit should be tested.
- Each channel should be tested at the lowest data rate in each a/b/g mode
- When the extrapolated maximum peak SAR for the maximum output channel is ≤ 1.6 W/kg and the 1g avg SAR is ≤ 0.8 W/kg, testing of other channels in the default test channel configuration is optional.
- If the device supports MIMO capability and the antennas are in close proximity to each other (within 3 cm – 5 cm), it is necessary to summarize the SAR_{1g} values of the antennas.
- If the peak SAR locations from different antennas are more than 5 cm apart, spatial summing is optional.
- Each channel should be tested at the lowest data rate in each a-b/g mode.

Mode 802.11	Frequency [MHz]	Channel	Turbo Channel	Default Test Channels			
				§ 15.247		UNII	
				b	g		
b / g	2412	1°		x	^		
	2437	6	6	x	^		
	2462	11°		x	^		
a	5180	36				x	
	5200	40	42				*
	5220	44	(5.21 GHz)				*
	5240	48	50			x	
	5260	52	(5.29 GHz)			x	
	5280	56	58				*
	5300	60	(5.29 GHz)				*
	5320	64				x	
	5500	100	Unknown				*
	5520	104				x	
	5540	108					*
	5560	112					*
	5580	116				x	
	5600	120					*
	5620	124				x	
	5640	128					*
	5660	132					*
	5680	136				x	
	5700	140					*
	5745	149		x		x	
	5765	153	152 (5.76 GHz)		*		*
	5785	157		x			*
	5805	161	160 (5.80 GHz)		*	x	
	§15.247	5825	165	x			
UNII or §15.247							

Table 2: Default Test channels given by the FCC.

X: default test channels*****: possible 802.11a channels with maximum avg output > the default test channels**^**: possible 802.11g channels with maximum avg output ¼ dB ≥ the default test channels

°: when output power is reduced for channel 1 and / or 11 to meet restricted band requirements the highest output channels closet to each of these channels should be tested

2.7.1 Measurement Variability

According KDB 865664 repeated measurements are required only when the measured SAR is ≥ 0.80 W/kg. If the measured SAR value of the initial repeated measurement is < 1.45 W/kg with $\leq 20\%$ variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg ($\sim 10\%$ from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

3 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. 3. Additional Fig. 4 show the equipment, similar to the installations in other laboratories.

- Fully compliant with all current measurement standards as stated in Fig. 6
- 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

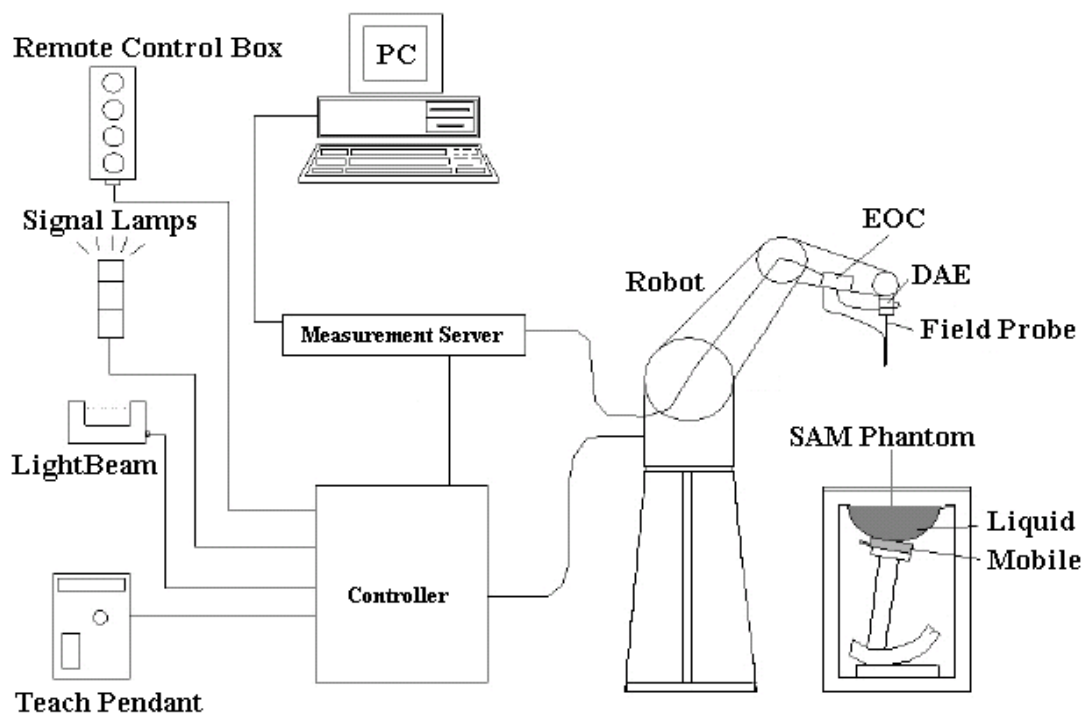


Fig. 3: The DASY4 measurement system.



Fig. 4: 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.

3.1 Phantoms

TWIN SAM PHANTOM V4.0	
	Specific Anthropomorphic Mannequin defined in IEEE 1528 and IEC 62209-1 and delivered by Schmid & Partner Engineering AG. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. The details and the Certificate of conformity can be found in Fig. 7.
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions	Length: 1000 mm; Width: 500 mm Height: adjustable feet
Filling Volume	approx. 25 liters

3.2 E-Field-Probes

For the measurements the Dosimetric E-Field Probes ET3DV6R or EX3DV4 with following specifications are used. They are manufactured and calibrated in accordance with KDB 865664 recommendations annually by Schmid & Partner Engineering AG.

ET3DV6R	
Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection system (ET3DV6 only) Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Dimensions	Overall length: 337 mm (Tip: 16 mm) Tip diameter: 6.8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.7 mm
Frequency	10 MHz to 2.3 GHz Linearity: ± 0.2 dB (30 MHz to 2.3 GHz)
Directivity	Axial isotropy: ± 0.2 dB in TSL (rotation around probe axis) Spherical isotropy: ± 0.4 dB in TSL (rotation normal to probe axis)
Dynamic Range	5 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB
Calibration Range	450 MHz / 750 MHz / 900 MHz / 1750 MHz / 1900 MHz / 1950 MHz for head and body simulating liquid

EX3DV4	
Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	Axial isotropy: ± 0.3 dB in TSL (rotation around probe axis) Spherical isotropy: ± 0.5 dB in TSL (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)
Calibration Range	1950 MHz / 2450 MHz / 2600 MHz / 3500 MHz / 5200 MHz / 5300 MHz / 5600 MHz / 5800 MHz for head and body simulating liquid

3.3 Measurement Procedure

The following steps are used for each test position:

- Establish a call with the maximum output power with a base station simulator or by software. 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 resolution settings for area scan and zoom scan according KDB 865664 D01 as shown in Table 3.
- 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 $\pm 0.21\text{dB}$.

			≤ 3 GHz	≥ 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx _{Area} , Δy _{Area}			≤ 2 GHz: ≤ 15 mm 2 - 3 GHz: ≤ 12 mm	3 - 4 GHz: ≤ 12 mm 4 - 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: ΔX _{Zoom} , ΔY _{Zoom}			≤ 2 GHz: ≤ 8 mm 2 - 3 GHz: ≤ 5 mm*	3 - 4 GHz: ≤ 5 mm* 4 - 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	Uniform grid: ΔZ _{Zoom} (n)		≤ 5 mm	3 - 4 GHz: ≤ 4 mm 4 - 5 GHz: ≤ 3 mm 5 - 6 GHz: ≤ 2 mm
	graded grid	ΔZ _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 - 4 GHz: ≤ 3 mm 4 - 5 GHz: ≤ 2.5 mm 5 - 6 GHz: ≤ 2 mm
		ΔZ _{Zoom} (n>1): between subsequent points	≤ 1.5· ΔZ _{Zoom} (n-1)	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 - 4 GHz: ≥ 28 mm 4 - 5 GHz: ≥ 25 mm 5 - 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium: see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz				

Table 3: Parameters for SAR scan procedures.

3.4 Uncertainty Assessment

Table 4 includes the worst case uncertainty budget suggested by KDB 865664 and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be $\pm 21.7\%$.

Uncertainty Budget of DASY4						
Error Sources	Uncertainty Value	Probability Distribution	Divisor	c_i	Standard Uncertainty	v_i^2 or v_{eff}
Measurement System						
Probe calibration	$\pm 5.9 \%$	Normal	1	1	$\pm 5.9 \%$	∞
Axial isotropy	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	0.7	$\pm 1.9 \%$	∞
Hemispherical isotropy	$\pm 9.6 \%$	Rectangular	$\sqrt{3}$	0.7	$\pm 3.9 \%$	∞
Boundary effects	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Linearity	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	∞
System detection limit	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Readout electronics	$\pm 1.0 \%$	Normal	1	1	$\pm 1.0 \%$	∞
Response time	$\pm 0.8 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.5 \%$	∞
Integration time	$\pm 2.6 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.5 \%$	∞
RF ambient conditions	$\pm 3.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Probe positioner	$\pm 0.4 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.2 \%$	∞
Probe positioning	$\pm 2.9 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Algorithm for max SAR eval.	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Test Sample Related						
Device positioning	$\pm 2.9 \%$	Normal	1	1	$\pm 2.9 \%$	145
Device holder	$\pm 3.6 \%$	Normal	1	1	$\pm 3.6 \%$	5
Power drift	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.9 \%$	∞
Phantom and Set-up						
Phantom uncertainty	$\pm 4.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.3 \%$	∞
Liquid conductivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.64	$\pm 1.8 \%$	∞
Liquid conductivity (meas.)	$\pm 2.5 \%$	Normal	1	0.64	$\pm 1.6 \%$	∞
Liquid permittivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.6	$\pm 1.7 \%$	∞
Liquid permittivity (meas.)	$\pm 2.5 \%$	Normal	1	0.6	$\pm 1.5 \%$	∞
Combined Uncertainty					$\pm 10.8 \%$	

Table 4: Uncertainty budget of DASY4 suggested by KDB 865664.

Table 5 includes the uncertainty budget suggested by IEC 62209-2 and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be $\pm 19.3 \%$.

Uncertainty Budget of DASY4						
Error Sources	Uncertainty Value	Probability Distribution	Divisor	c_i	Standard Uncertainty	v_i^2 or v_{eff}
Measurement Equipment						
Calibration	$\pm 4.8 \%$	Normal	1	1	$\pm 4.8 \%$	∞
Isotropy	$\pm 7.6 \%$	Rectangular	$\sqrt{3}$	1	$\pm 4.4 \%$	∞
Linearity	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	∞
Detection limits	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Boundary effects	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Measurement device	$\pm 1.0 \%$	Normal	1	1	$\pm 1.0 \%$	∞
Response time	$\pm 0.8 \%$	Normal	1	1	$\pm 0.8 \%$	∞
Noise	$\pm 0 \%$	Normal	1	1	$\pm 0 \%$	∞
Integration time	$\pm 2.6 \%$	Normal	1	1	$\pm 2.6 \%$	∞
Mechanical Constraints						
Scanning system	$\pm 0.4 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.2 \%$	∞
Phantom shell	$\pm 4.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.3 \%$	∞
Matching between probe & phantom	$\pm 2.9 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Positioning of the phone	$\pm 2.9 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.9 \%$	145
Physical Parameters						
Liquid conductivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.5	$\pm 1.4 \%$	∞
Liquid conductivity (meas.)	$\pm 4.3 \%$	Rectangular	$\sqrt{3}$	0.5	$\pm 1.2 \%$	∞
Liquid permittivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.5	$\pm 1.4 \%$	∞
Liquid permittivity (meas.)	$\pm 4.3 \%$	Rectangular	$\sqrt{3}$	0.5	$\pm 1.2 \%$	∞
Drift in output power of the phone, probe, temperature and humidity	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.9 \%$	∞
Perturbation by the environment	$\pm 3.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Post - Processing						
Algorithms for Max. SAR Eva.	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Combined Uncertainty					$\pm 9.7 \%$	

Table 5: Uncertainty budget of DASY4 suggested by IEC 62209-2.

4 Output Power Values and Tune-up information

4.1 Output Power Values and Tune-up information for IEEE802.11 b/g

Averaged Output Power IEEE 802.11 b [dBm]						
Mode	Freq. [MHz]	CH	Data Rate [Mbit/s]			
			1	2	5.5	11
b	2412	1	18.3	18.3	18.1	18.1
	2437	6	18.5	18.4	18.3	18.3
	2462	11	18.6	18.6	18.5	18.4
Tune-Up Limit			19.0		18.5	

Table 6: Measured output power for b-mode for Prodigy Tablet PGI-100 tablet from HumanWare.

Averaged Output Power IEEE 802.11 g [dBm]										
Mode	Freq. [MHz]	CH	Data Rate [Mbit/s]							
			6	9	12	18	24	36	48	54
g	2412	1	16.8	16.7	16.7	16.5	14.5	14.6	12.9	12.9
	2437	6	16.9	16.8	16.8	16.7	15.0	14.7	13.0	13.0
	2462	11	17.2	17.2	17.2	17.1	15.4	15.2	13.4	13.4
Tune-Up Limit			18.0				16.0		14.0	

Table 7: Measured output power for g-mode for Prodigy Tablet PGI-100 tablet from HumanWare.

4.2 Output Power Values for Bluetooth

Averaged Output Power for Bluetooth [dBm]				
Mode	Freq. [MHz]	CH	BDR	EDR2
BT	2402	0	5.00	3.50
	2440	39	4.80	3.00
	2480	78	4.60	2.85

Table 8: Measured output power for Bluetooth for Prodigy Tablet PGI-100 tablet from HumanWare.

Tune-up procedure according KDB 447498 D01v05r02 is applicable. The measured SAR values are scaled according the tune-up information given by the manufacturer, shown above.

5 SAR Test Exclusion Consideration according KDB 447498

Standalone SAR Test Exclusion Considerations for Body Worn Configuration						
Communication System	Freq. [MHz]	Distance [mm]	Pavg [dBm]	Pavg [mW]	Threshold 1g Comparison Values	SAR Test Exclusion (Yes/No)
Bluetooth	2480	5	5.00	3.16	1.57	Yes
IEEE 802.11 b	2462	5	19.0	79.43	24.92	No

Table 9: SAR test exclusion for body worn configuration.

Standalone SAR Test Exclusion Considerations for Extremity Exposure						
Communication System	Freq. [MHz]	Distance [mm]	Pavg [dBm]	Pavg [mW]	Threshold 10g Comparison Values	SAR Test Exclusion (Yes/No)
Bluetooth	2480	5	5.00	3.16	1.57	Yes
IEEE 802.11 b	2462	5	19.0	79.43	24.92	No

Table 10: SAR test exclusion for extremity exposure.

The above table shows the SAR test exclusion consideration for the applicable modes against the different device edges with the relevant distances.

The 1g and 10g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances $\leq 50\text{mm}$ are determined by:

$$[(\text{max power of channel, incl. tune-up tolerance, mW})/(\text{min test separation distance, mm})]^* [\sqrt{f(\text{GHz})}]$$

≤ 3.0 for 1g SAR and ≤ 7.5 for 10g extremity SAR

When the minimum test separation distance is $< 5\text{mm}$, a distance of 5mm is applied to determine SAR test exclusion.

6 SAR Results

According the size of the device with an overall diagonal dimension of 17.5 cm, following KDB 648474 D04, the Body SAR was evaluated for Phablet computers. The tables below contain the measured SAR values averaged over a mass of 1 g. SAR assessment was conducted in the worst case configuration with output power values according Table 6 - 7. The device does not support any power reduction mode based on proximity sensor.

Following KDB 447498 D01 V05, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.

Scaling Factor = tune-up limit power (mW) / RF power (mW)

Reported SAR = measured SAR * scaling factor

Furthermore, testing of other required channels within the operating mode of frequency band is not required when the reported SAR for the mid-band or highest output power channel is ≤ 0.4 W/kg for transmission band ≥ 200 MHz.

SAR Results for WLAN Antenna (2.4 GHz Range)												
Band	Freq. [MHz]	Channel	Test Position	Spacing [mm]	Figure No.	Tune-Up Limit [dBm]	Output Power [dBm]	Measured SAR _{1g} [W/kg]	Power Drift [dBm]	Scaling Factor	Reported SAR _{1g} [W/kg]	Plot No.
IEEE 802.11 b (1 Mbit/s)	2437	6	Front	0	10	19.0	18.5	0.054	-0.169	1.122	0.061	1
		6	Back	0	11		18.5	0.035	0.048	1.122	0.039	2
		6	Top	0	12		18.5	0.023	-0.122	1.122	0.026	3
		6	Right	0	13		18.5	0.103	-0.090	1.122	0.115	4
		6	Bottom	0	14		18.5	N.A.	N.A.	1.122	N.A.	5

Table 11: SAR results for body exposure for IEEE 802.11 b/g (2.4 GHz) for Prodigy Tablet PGI-100 from HumanWare.

SAR Results for WLAN Antenna (2.4 GHz Range)												
Band	Freq. [MHz]	Channel	Test Position	Spacing [mm]	Figure No.	Tune-Up Limit [dBm]	Output Power [dBm]	Measured SAR _{10g} [W/kg]	Power Drift [dBm]	Scaling Factor	Reported SAR _{10g} [W/kg]	Plot No.
IEEE 802.11 b (1 Mbit/s)	2437	6	Front	0	10	19.0	18.5	0.020	-0.169	1.122	0.022	1
		6	Back	0	11		18.5	0.012	0.048	1.122	0.013	2
		6	Top	0	12		18.5	0.006	-0.122	1.122	0.007	3
		6	Right	0	13		18.5	0.026	-0.090	1.122	0.029	4
		6	Bottom	0	14		18.5	N.A.	N.A.	1.122	N.A.	5

Table 12: SAR results for extremity exposure for IEEE 802.11 b/g (2.4 GHz) for Prodigy Tablet PGI-100 from HumanWare.

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%.

6.1 Estimated SAR for Standalone SAR Excluded Modes according KDB 447498

Since the Bluetooth and WLAN antenna can't transmit simultaneously, for Bluetooth a SAR estimation based on KDB 447498 for SAR excluded modes is not applicable. Accordingly, the device does not support any hotspot mode.

6.2 Multiple Transmitter Information

According KDB 447498, simultaneous transmission consideration for multiple transmitters needs to be addressed, if applicable. Since for Bluetooth and WLAN the same antenna is used, Bluetooth and WLAN can't be active at the same time.

7 Appendix

7.1 Administrative Data

Date of Validation: May 05, 2014
 Date of Measurement: May 05, 2014
 Data Stored: Nemko_60320_6140111
 Contact: IMST GmbH
 Carl-Friedrich-Gauß-Str. 2 - 4
 D-47475 Kamp-Lintfort, Germany
 Tel.: +49- 2842-981 378
 Fax: +49- 2842-981 399
 email: vandenBosch@imst.de

7.2 Device under Test and Test Conditions

MTE: Prodigy Tablet PGI-100 from HumanWare
 (production line unit)
 Date of Receipt: May 05, 2014
 IMEI: 109000002469
 FCC ID: XT5PGITAB
 IC: 8670A-PGITAB
 Equipment Class: Portable device
 RF Exposure Environment: General Population/ Uncontrolled
 Power Supply: Internal Battery
 Antenna: integrated
 Used Accessory: N.A.

Standard	TX Range [MHz]	RX Range [MHz]	Used Channels	Crest Factor	Phantom
IEEE 802.11 b	2412.0 – 2462.0	2412.0 – 2462.0	1, 6, 11	1	SAM Twin Phantom V4.0

Table 13: Used channels and crest factors during the test.

7.3 Tissue Recipes

The following recipes are provided in percentage by weight.

2450 MHz Body:	31.40 %	Diethylenglykol-monobutylether
	68.60 %	De-IonizedWater

7.4 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 $\pm 5\%$ of the recommended values given by the FCC.

Tissue Simulating Liquids			
Frequency		ϵ_r	σ [S/m]
2450 MHz Body (IEEE 802.11 b/g)	Recommended Value	52.70 ± 2.65	1.95 ± 0.09
	Measured Value (Ch. 1)	52.90	1.94
	Measured Value (Ch. 6)	52.80	1.98
	Measured Value (Ch. 11)	52.80	2.02

Table 14: Parameters of the tissue simulating liquids.

7.5 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 15 - 16 and shown in Figure 5. The target values were adopted from the calibration certificates which are attached in the appendix. Table 17 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 $\pm 16.8\%$.

Dipole Target Results					
Band	Available Dipoles		SAR_{1g} [W/kg]	ϵ_r	σ [S/m]
IEEE 802.11 b/n	D2450V2, SN #709	Target Values Body	13.90	50.90	1.96

Table 15: Dipole target results as given by the calibration certificates.

Dipole Validation Results					
Band	Used Dipoles		SAR_{1g} [W/kg]	ϵ_r	σ [S/m]
IEEE 802.11 b/n	2450 MHz, SN:709	Measured Values Body	14.20	52.80	2.00

Table 16: Measured dipole validation results.

Test Laboratory: Imst GmbH, DASY Yellow (II); **File Name:** [050514_y_3860_2450.da4](#)

DUT: Dipole 2450 MHz SN: 709; **Type:** D2450V2; **Serial:** D2450V2 - SN:709

Program Name: System Performance Check at 2450 MHz

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2450$ MHz; $\sigma = 2$ mho/m; $\epsilon_r = 52.8$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY4 Configuration:

- Probe: EX3DV4 - SN3860; ConvF(7.47, 7.47, 7.47); Calibrated: 29.07.2013
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn631; Calibrated: 23.09.2013
- Phantom: SAM Glycol 1340; Type: QD 000 P40 CB; Serial: TP-1340
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

d=10mm, Pin=250mW/Area Scan (7x7x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 15.5 mW/g

d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 88.3 V/m; Power Drift = 0.069 dB

Peak SAR (extrapolated) = 31.6 W/kg

SAR(1 g) = 14.2 mW/g; SAR(10 g) = 6.29 mW/g

Maximum value of SAR (measured) = 15.9 mW/g

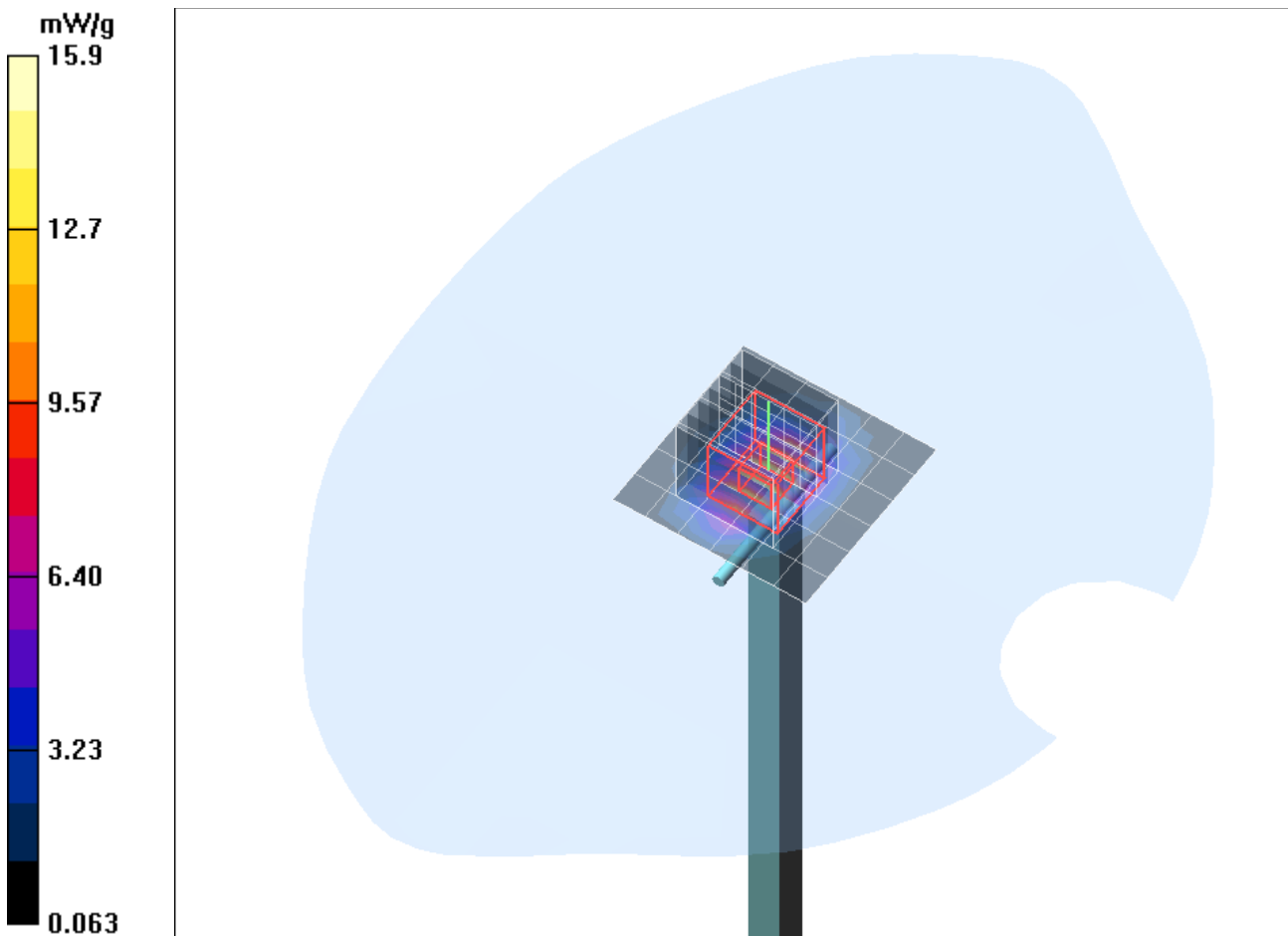


Fig. 5: Validation measurement 2450 MHz Body (May 05, 2014), coarse grid.

Uncertainty Budget up to 3 GHz						
Error Sources	Uncertainty Value	Probability Distribution	Divis or	c_i	Standard Uncertainty	v_i^2 or v_{eff}
Measurement System						
Probe calibration	$\pm 5.9 \%$	Normal	1	1	$\pm 5.9 \%$	∞
Axial isotropy	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	∞
Hemispherical isotropy	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	∞
Boundary effects	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Linearity	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	∞
System detection limit	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Readout electronics	$\pm 0.3 \%$	Normal	1	1	$\pm 0.3 \%$	∞
Response time	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	∞
Integration time	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	∞
RF ambient conditions	$\pm 3.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Probe positioner	$\pm 0.4 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.2 \%$	∞
Probe positioning	$\pm 2.9 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	∞
Algorithms for max SAR eval.	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	∞
Dipole						
Dipole Axis to Liquid Distance	$\pm 2.0 \%$	Rectangular	1	1	$\pm 1.2 \%$	∞
Input power and SAR drift mea.	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	∞
Phantom and Set-up						
Phantom uncertainty	$\pm 4.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.3 \%$	∞
Liquid conductivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.64	$\pm 1.8 \%$	∞
Liquid conductivity (meas.)	$\pm 2.5 \%$	Normal	1	0.64	$\pm 1.6 \%$	∞
Liquid permittivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.6	$\pm 1.7 \%$	∞
Liquid permittivity (meas.)	$\pm 2.5 \%$	Normal	1	0.6	$\pm 1.5 \%$	∞
Combined Uncertainty					$\pm 9.2 \%$	

Table 17: Uncertainty budget for the system performance check up to 3 GHz.

7.6 Environment

To comply with the required noise level (less than 12 mW/kg) periodically measurements without a DUT were conducted.

Humidity: $40\% \pm 5\%$

7.7 Test Equipment

SAR Equipment				
Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
DASY4 Systems				
Software Versions DASY4	V4.7	N/A	N/A	N/A
Software Versions SEMCAD	V1.8	N/A	N/A	N/A
Dosimetric E-Field Probe	EX3DV4	3860	07/2013	07/2014
Data Acquisition Electronics	DAE 4	631	09/2013	09/2014
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	D2450V2	709	09/2013	09/2015
Material Measurement				
Network Analyzer	E5071C	MY46103220	07/2013	07/2015
Dielectric Probe Kit	HP85070B	US33020263	N/A	N/A

Table 18: SAR equipment.

Test Equipment				
Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
Power Meters				
Power Meter. Agilent	E4416A	GB41050414	12/2012	12/2014
Power Meter. Agilent	E4417A	GB41050441	12/2012	12/2014
Power Meter. Anritsu	ML2487A	6K00002319	02/2014	02/2016
Power Meter. Anritsu	ML2488A	6K00002078	02/2014	02/2016
Power Sensors				
Power Sensor. Agilent	E9301H	US40010212	12/2012	12/2014
Power Sensor. Agilent	E9301A	MY41495584	12/2012	12/2014
Power Sensor. Anritsu	MA2481B	031600	02/2014	02/2016
Power Sensor. Anritsu	MA2490A	031565	02/2014	02/2016
RF Sources				
Network Analyzer	E5071C	MY46103220	07/2013	07/2015
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	N/A	N/A

Table 19: Test equipment.

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

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Fig. 7: Certificate of conformity for the used SAM phantom.

7.9 Pictures of the Device under Test

Fig. 8 - 9 show the device under test.



Fig. 8: Front and back view of HumanWare Prodigy Tablet PGI-100.



Fig. 9: Antenna location and separation distances.

7.10 Test Positions for the Device under Test

Fig. 10 – 14 show the test positions for the SAR measurements.



Fig. 10: Body supported configuration, position 1, front side toward the phantom, gap = 0 mm.



Fig. 11: Body supported configuration, position 2, back side toward the phantom, gap = 0 mm.



Fig. 12: Body supported configuration, position 3, top edge toward the phantom, gap = 0 mm.



Fig. 13: *Body supported configuration, position 4, right edge toward the phantom, gap = 0 mm.*



Fig. 14: *Body supported configuration, position 5, bottom edge toward the phantom, gap = 0 mm.*

7.11 Pictures to Demonstrate the Required Liquid Depth

Figure 15 shows the liquid depth in the used SAM phantom.



Fig. 15: *Liquid depth for IEEE 802.11b body measurements.*

8 References

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- [DASY4] Schmid & Partner Engineering AG: DASY4 Manual. April 2008
- [FCC 96-326] FCC 96-326. ET Docket No. 93-62. Report and Order. August 1. 1996
- [KDB 648474] 648474 D04 SAR Handset SAR v01r02; SAR Evaluation Considerations for Wireless Handsets
- [KDB 447498] 447498 D01 v05r01 General RF Exposure Guidance v05. May 28. 2013
- [KDB 865664] 865664 D01 v01r01 SAR measurement 100 MHz to 6 GHz. May 28. 2013
- [KDB 248227] 248227 D01 SAR meas for 802.11 a b g v01r02; SAR Measurement Procedures for 802.11 a/b/g Transmitters, May 2007
- [47 CFR] Code of Federal Regulations; Title 47. Telecommunications