
Report

Dosimetric Assessment of the Portable Device Panasonic KX-TGA641 (FCC ID: ACJ96NKX-TGA640)

According to the FCC Requirements

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Executive Summary

The KX-TGA641 is a cordless telephone (Portable Device) from Panasonic operating in the 1920 MHz frequency range (US DECT Standard). The device has two integrated antennas which are working as a diversity system.

The objective of the measurements done by IMST was the dosimetric assessment of one device in a worst case setup, the handset was set to use one specific antenna and frequency during the measurement.

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.

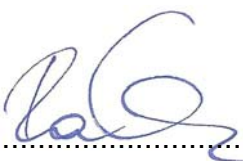
The Panasonic KX-TGA641 cordless telephone (FCC ID: ACJ96NKX-TGA640) is in compliance with the Federal Communications Commission (FCC) Guidelines [OET 65] for uncontrolled exposure.

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

Body worn with the following accessories:

- **Belt clip with headset (display towards the phantom, distance 0 mm)**
- **Belt clip with headset (display towards the ground, distance 0 mm)**

Maximum SAR_{1g} = 0.019 W/kg (Head, right cheek, Channel 2, Antenna 1)

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1 Subject of Investigation

The product KX-TGA641 is a new cordless telephone (Portable Device) from Panasonic operating in the 1920 MHz frequency range (US DECT Standard). The device has two integrated antennas which are working as a diversity system.



Fig. 1: Pictures of the device under test.

The objective of the measurements done by IMST was the dosimetric assessment of one device in a worst case setup, the handset was set to use one specific antenna and frequency during the measurement. The examinations have been carried out with the dosimetric assessment system „DASY4“.

2 The IEEE Standard C95.1-1999 and the FCC Exposure Criteria

In the USA the FCC exposure criteria [OET 65] are based on the withdrawn IEEE Standard C95.1-1999 [IEEE C95.1-1999]. This version was replaced by the IEEE Std C95.1-2005 in October, 2005.

Both IEEE standards sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz. One of the major differences in the newly revised C95.1 is the change in the basic restrictions for localized exposure, from 1.6 W/kg averaged over 1 g tissue to 2.0 W/kg averaged over 10 g tissue, which is now identical to the ICNIRP guidelines [ICNIRP 1998].

2.1 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.

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:

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

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.

2.3 SAR Limit

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}) with the shape of a cube.

| Standard | Status | SAR limit [W/kg] |
|-----------------|----------|------------------|
| IEEE C95.1-1999 | Replaced | 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.

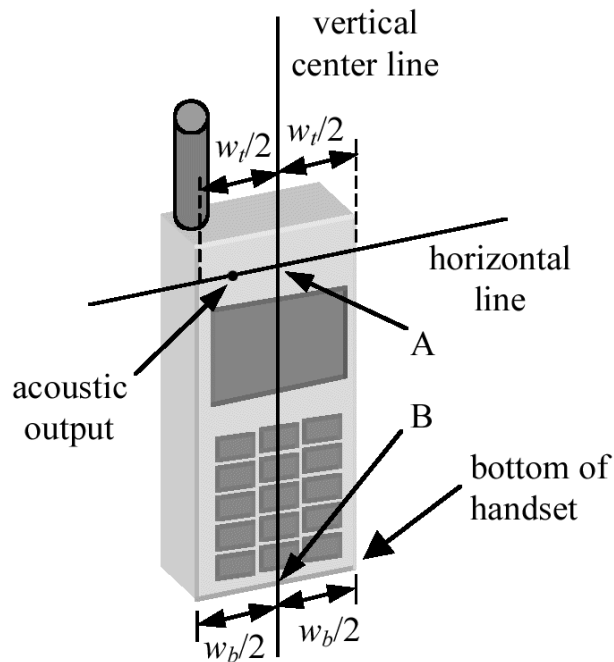


Fig. 2: Handset vertical and horizontal reference lines.

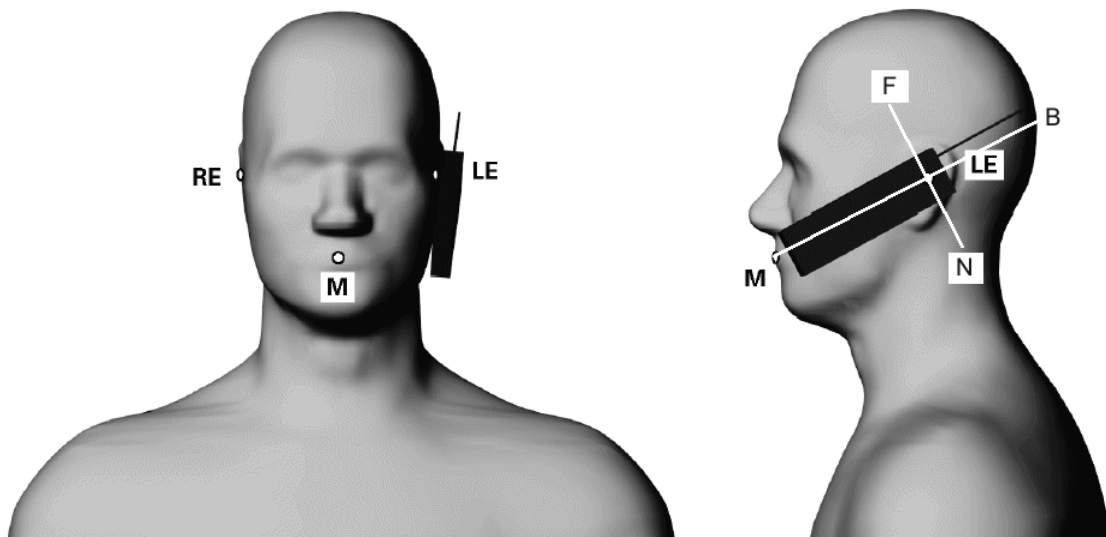


Fig. 3: Phantom reference points.

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

- **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.

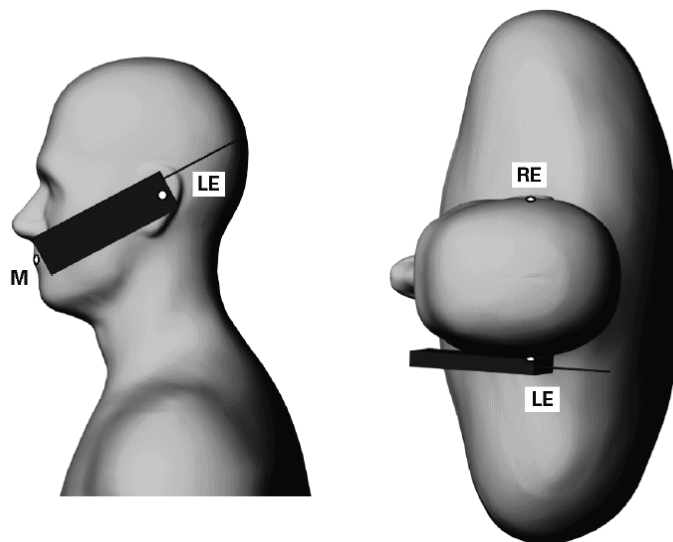


Fig. 4: The cheek position.

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

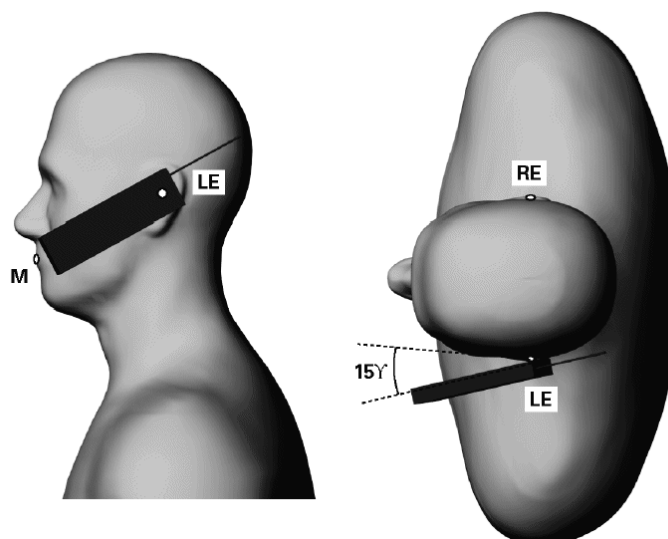


Fig. 5: The tilted position.

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.

If the manufacturer provides none body-worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall not exceed 2.5 cm.

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.

- Fully compliant with all current measurement standards as stated in Fig. 12
- 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

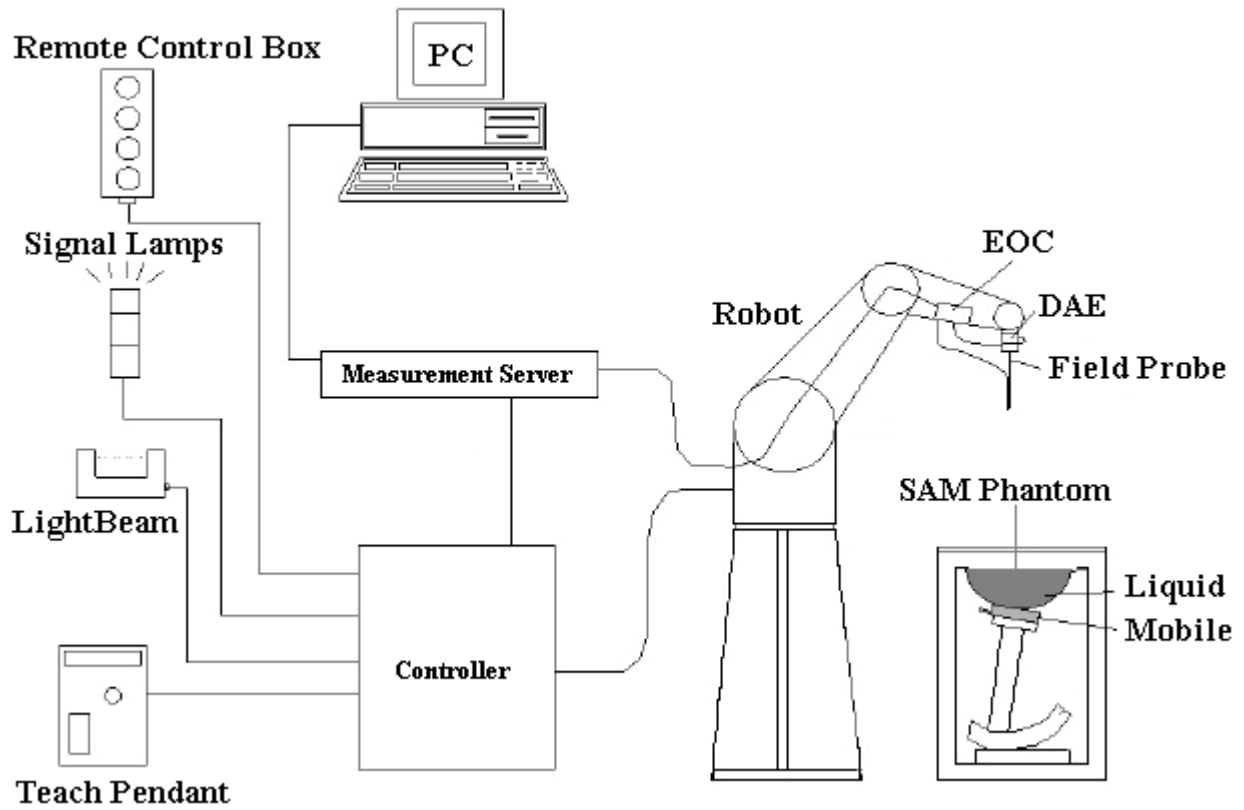


Fig. 6: The DASY4 measurement system.

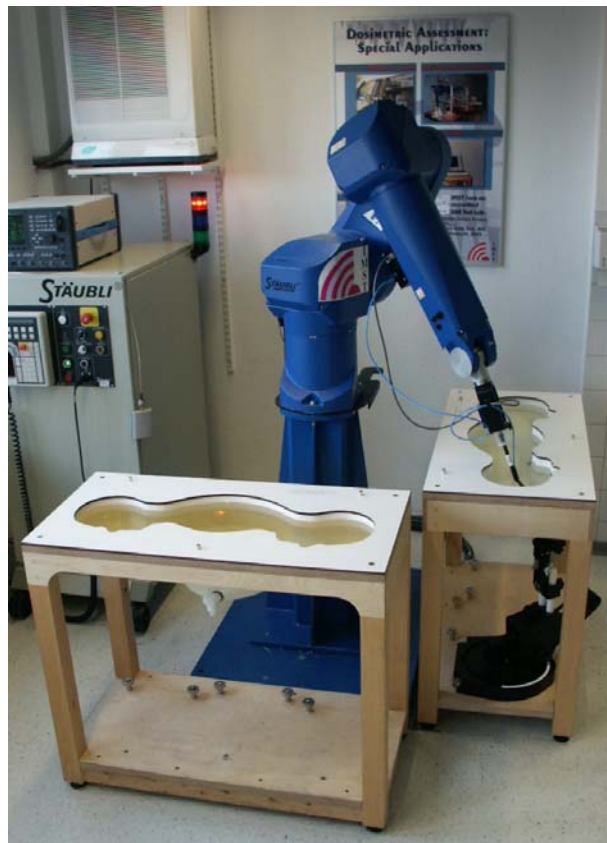


Fig. 7: The measurement set-up with two SAM phantoms containing tissue simulating liquid.

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 $2 \text{ mm} \pm 0.2 \text{ mm}$. 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. 13.

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: $5\mu\text{W/g}$ to $> 100\text{mW/g}$
- Tip diameter: 6.8 mm
- Probe linearity: $\pm 0.2 \text{ dB}$ (30 MHz to 3 GHz)
- Axial isotropy: $\pm 0.2 \text{ dB}$
- Spherical isotropy: $\pm 0.4 \text{ dB}$
- Distance from probe tip to dipole centers: 2.7 mm
- Calibration range: 900MHz / 1850MHz for head and body simulating liquid
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°

EX3DV4:

- Dynamic range: 10 μ W/g to > 100mW/g (noise typically < 1 μ W/g)
- Tip diameter: 2.5 mm
- Probe linearity: \pm 0.2 dB (30 MHz to 6 GHz)
- Axial isotropy: \pm 0.2 dB
- Spherical isotropy: \pm 0.4 dB
- Distance from probe tip to dipole centers: 1.0 mm
- Calibration range: 1950 MHz / 2450MHz / 3500 MHz / 5200 MHz / 5500 MHz / 5800 MHz 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 \pm 0.21dB.

5.4 Uncertainty Assessment

Table 2 includes the worst case uncertainty budget suggested by the [IEEE 1528-2003] and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be $\pm 21.7\%$ and is valid up to 3.0 GHz.

| 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 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 0 1921.536MHz 17.9 dBm | Channel 2 1924.992 MHz 17.8 dBm | Channel 4 1928.448 MHz 17.8 dBm | Ambient [° C] | Liquid [° C] |
| Left Side | Cheek | | 0.0130 (-0.080) | | 21.8 | 20.9 |
| | Tilted | | 0.0078 (0.062) | | 21.8 | 20.9 |
| Right Head | Cheek | | 0.0190 (0.174) | | 21.8 | 20.9 |
| | Tilted | | 0.0120 (0.129) | | 21.8 | 20.9 |

Table 3: Measured head phantom results for the Panasonic KX-TGA641 with Antenna 1.

| Phantom Configuration Liquid depth: 16.4 cm | Test Position | SAR _{1g} [W/kg] (Drift[dB]) | | | Temperature | |
|---|---------------|--------------------------------------|---------------------------------------|---------------------------------------|------------------|-----------------|
| | | Channel 0 1921.536MHz 17.9 dBm | Channel 2 1924.992 MHz 17.8 dBm | Channel 4 1928.448 MHz 17.8 dBm | Ambient [° C] | Liquid [° C] |
| Left Side | Cheek | | 0.0150 (0.024) | | 21.8 | 20.9 |
| | Tilted | | 0.0066 (0.151) | | 21.8 | 20.9 |
| Right Head | Cheek | | 0.0100 (0.037) | | 21.8 | 20.9 |
| | Tilted | | 0.0044 (0.104) | | 21.8 | 20.9 |

Table 4: Measured head phantom results for the Panasonic KX-TGA641 with Antenna 2.

| Accessory Liquid depth: 16.3 cm | SAR _{1g} [W/kg] (Drift[dB]) | | | Temperature | |
|---|--------------------------------------|---------------------------------------|---------------------------------------|------------------|-----------------|
| | Channel 0 1921.536MHz 17.9 dBm | Channel 2 1924.992 MHz 17.8 dBm | Channel 4 1928.448 MHz 17.8 dBm | Ambient [° C] | Liquid [° C] |
| Antenna 1,headset, (display towards the phantom, 0 mm distance) | | 0.0130 (0.270) | | 22.2 | 21.1 |
| Antenna 1,headset, (display towards the ground, 0 mm distance) | | 0.0045 (0.614) | | 22.2 | 21.1 |

Table 5: Measurement results in body-worn configuration for the Panasonic KX-TGA641 with antenna 1.

| Accessory Liquid depth: 16.3 cm | SAR _{1g} [W/kg] (Drift[dB]) | | | Temperature | |
|---|--------------------------------------|---------------------------------------|---------------------------------------|------------------|-----------------|
| | Channel 0 1921.536MHz 17.9 dBm | Channel 2 1924.992 MHz 17.8 dBm | Channel 4 1928.448 MHz 17.8 dBm | Ambient [° C] | Liquid [° C] |
| Antenna 2,headset, (display towards the phantom, 0 mm distance) | | 0.0110 (0.572) | | 22.2 | 21.1 |
| Antenna 2,headset, (display towards the ground, 0 mm distance) | | 0.0074 (0.440) | | 22.2 | 21.1 |

Table 6: Measurement results in body-worn configuration for the Panasonic KX-TGA641 with antenna 2.

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 **Nemko Comlab**.

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]). Since the measured e-fields are below the detection limit of the probe the drift could be larger than 5%.

7 Evaluation

In Fig. 8 the head phantom SAR results for US DECT Standard given in Table 3 - 4 are summarized and compared to the limit. In Fig. 9 the SAR results in body-worn configuration for US DECT Standard given in Table 5 - 6 are summarized and compared to the limit.

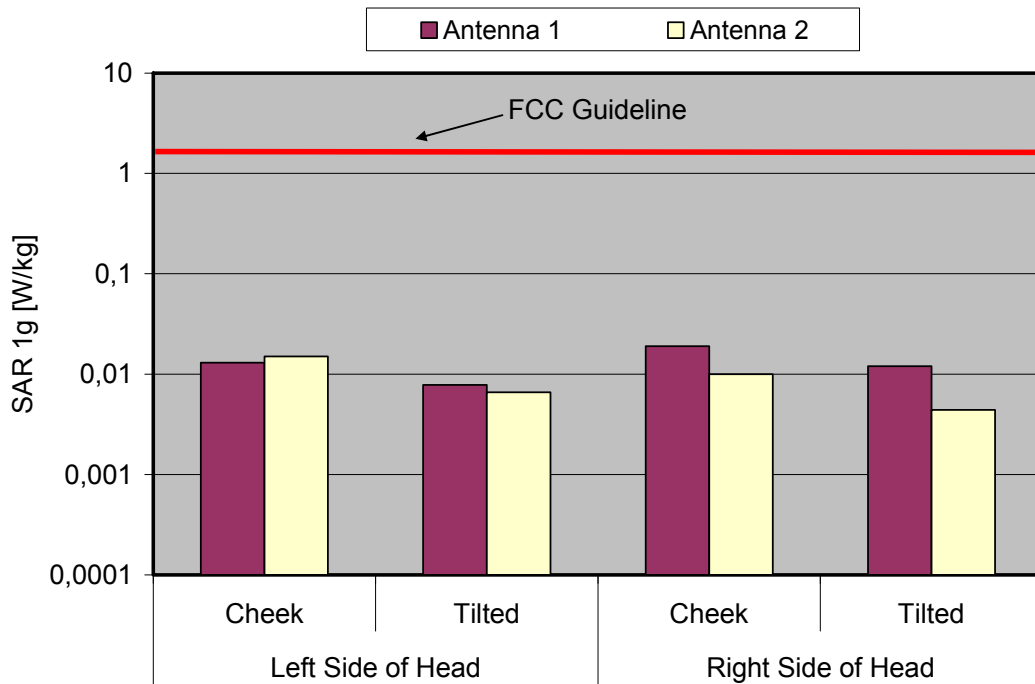


Fig. 8: The measured head phantom SAR values for the Panasonic KX-TGA641 for the US DECT standard in comparison to the FCC exposure limit.

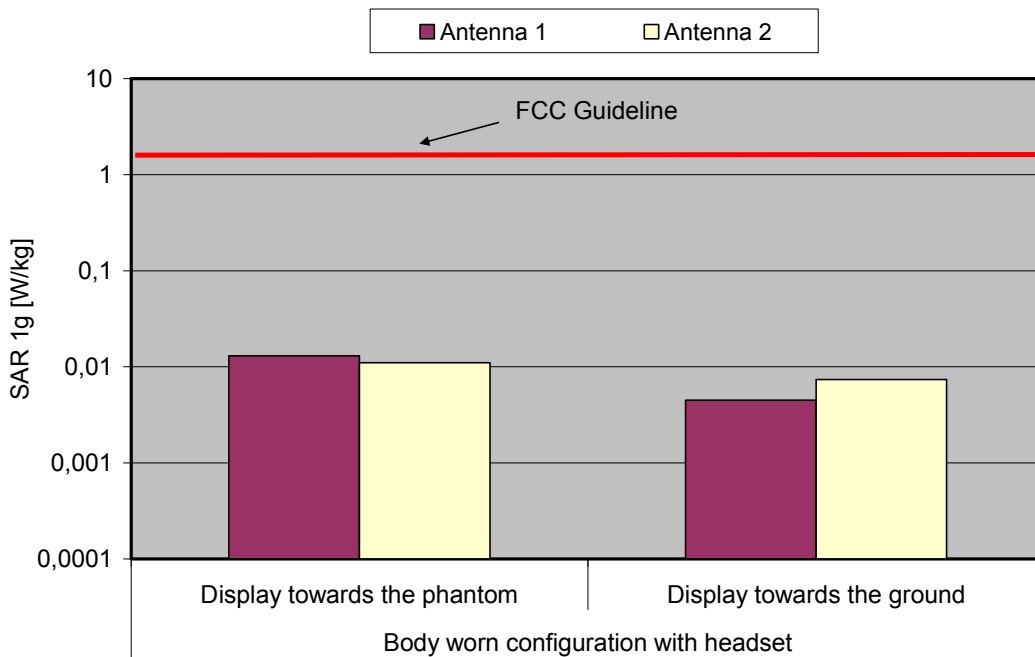


Fig. 9: The measured SAR values in body-worn configuration for the Panasonic KX-TGA641 for the US DECT standard in comparison to the FCC exposure limit.

The Panasonic KX-TGA641 cordless telephone (FCC ID: ACJ96NKX-TGA640) 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:

- Belt clip with headset (display towards the phantom, distance 0 mm)
- Belt clip with headset (display towards the ground, distance 0 mm)

Maximum SAR_{1g} = 0.019 W/kg (Head, right cheek, Channel 2, Antenna 1)

8 Appendix

8.1 Administrative Data

Date of validation: 1900 MHz, Head: October 01, 2008
 1900 MHz, Body: October 01, 2008
 Date of measurement: October 01, 2008
 Data stored: Nemko_6620_716

8.2 Device under Test and Test Conditions

MTE: Panasonic KX-TGA641, identical prototype
 Date of receipt: September 26, 2008
 SN: No. 3 (SAR)
 FCC ID: ACJ96NKX-TGA640
 Equipment class: Portable device
 RF exposure environment: General Population/ Uncontrolled
 Power supply: Internal Battery (Other batteries not available)
 Antenna: integrated (two)
 Tested Accessories, Body: Headset (KX-TCA95)
 Available Accessories: Headset (KX-TCA95)
 Measured Standards: American 1924.992MHz (US DECT)
 Method to establish a call: internal software
 Crest Factor: 24
 TX range: DECT: 1921.536 MHz – 1928.448 MHz
 RX range: DECT: 1921.536 MHz – 1928.448 MHz
 Used TX Channels: DECT: low: ch 0 center: ch 2, high: ch 4
 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 $\pm 5\%$ of the recommended values given by the FCC.

| Frequency | | ϵ_r | σ [S/m] | Temperature | |
|----------------------------------|-------------------|------------------|-----------------|------------------|-----------------|
| | | | | Ambient [° C] | Liquid [° C] |
| 1900 MHz (Head, Validation) | Recommended Value | 40.00 ± 2.00 | 1.40 ± 0.07 | 20.0 - 26.0 | - |
| | Measured Value | 41.70 | 1.43 | 21.7 | 20.9 |
| 1925 MHz (Head, Measurements) | Recommended Value | 40.00 ± 2.00 | 1.40 ± 0.07 | 20.0 - 26.0 | - |
| | Measured Value | 41.60 | 1.46 | 21.7 | 20.9 |

| Frequency | | ϵ_r | σ [S/m] | Temperature | |
|----------------------------------|-------------------|------------------|-----------------|------------------|-----------------|
| | | | | Ambient [° C] | Liquid [° C] |
| 1900 MHz (Body, Validation) | Recommended Value | 53.30 ± 2.60 | 1.52 ± 0.07 | 20.0 - 26.0 | - |
| | Measured Value | 51.50 | 1.54 | 22.0 | 21.1 |
| 1925 MHz (Body, Measurements) | Recommended Value | 53.30 ± 2.60 | 1.52 ± 0.07 | 20.0 - 26.0 | - |
| | Measured Value | 51.50 | 1.58 | 22.0 | 21.1 |

Table 7: 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 8 - 9 and shown in Fig. 10-11. The target values were adopted from the manufactures calibration certificates which are attached in the appendix. Table 10 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 $\pm 16.8\%$.

| Available Dipoles | | SAR _{1g} [W/kg] | ϵ_r | σ [S/m] |
|--------------------|--------------------|-----------------------------|--------------|----------------|
| D1900V2, SN #5d051 | Target Values Head | 9.23 | 39.30 | 1.46 |
| D1900V2, SN #535 | Target Values Body | 9.32 | 53.60 | 1.54 |
| D1900V2, SN #5d051 | | 9.26 | 54.30 | 1.52 |

Table 8: 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: #5d051 | Measured Values Head | 9.62 | 41.70 | 1.43 | 21.7 | 20.9 |
| 1900 MHz, SN: #5d051 | Measured Values Body | 9.82 | 51.50 | 1.54 | 22.0 | 21.1 |

Table 9: Measured dipole validation results.

Test Laboratory: IMST GmbH, DASY Blue (I); File Name: [011008 b 1579.da4](#)

DUT: Dipole 1900 MHz SN: 5d051; Type: D1900V2; Serial: D1900V2 - SN5d051

Program Name: System Performance Check at 1900 MHz

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 1900$ MHz; $\sigma = 1.43$ mho/m; $\epsilon_r = 41.7$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY4 Configuration:

- Probe: ET3DV6R - SN1579; ConvF(5.01, 5.01, 5.01); Calibrated: 23.01.2008
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn335; Calibrated: 08.02.2008
- Phantom: SAM Glycol 1176; Type: Speag; Serial: 1176
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

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

Maximum value of SAR (measured) = 10.9 mW/g

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

Reference Value = 92.9 V/m; Power Drift = -0.005 dB

Peak SAR (extrapolated) = 16.6 W/kg

SAR(1 g) = 9.62 mW/g; SAR(10 g) = 5.06 mW/g

Maximum value of SAR (measured) = 11.0 mW/g

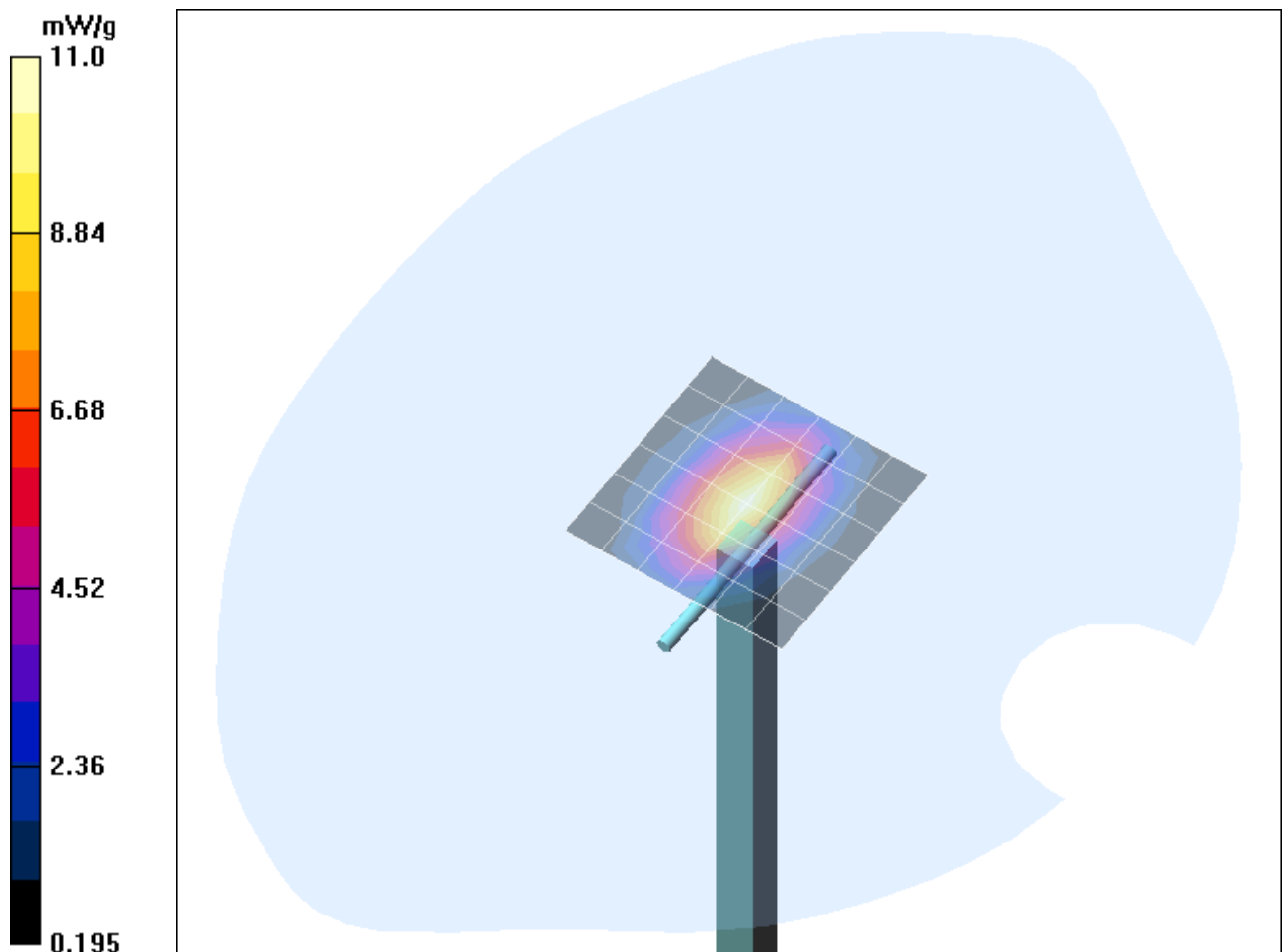


Fig. 10: Validation measurement 1900 MHz Head (October 01, 2008), coarse grid. Ambient Temperature: 21.7° C, Liquid Temperature: 20.9° C.

Test Laboratory: Imst GmbH, DASY Yellow (II); File Name: [011008_y_3536.da4](#)

DUT: Dipole 1900 MHz SN: 5d051; Type: D1900V2; Serial: D1900V2 - SN5d051
 Program Name: System Performance Check at 1900 MHz

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 1900$ MHz; $\sigma = 1.54$ mho/m; $\epsilon_r = 51.5$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

DASY4 Configuration:

- Probe: EX3DV4 - SN3536; ConvF(8.15, 8.15, 8.15); Calibrated: 19.09.2008
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn631; Calibrated: 17.09.2008
- Phantom: SAM Glycol 1340; Type: QD 000 P40 CB; Serial: TP-1340
- Measurement SW: DASY4, V4.7 Build 71; Postprocessing SW: SEMCAD, V1.8 Build 184

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

Maximum value of SAR (measured) = 10.9 mW/g

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

Reference Value = 84.3 V/m; Power Drift = 0.000 dB

Peak SAR (extrapolated) = 18.2 W/kg

SAR(1 g) = 9.82 mW/g; SAR(10 g) = 5.07 mW/g

Maximum value of SAR (measured) = 11.1 mW/g

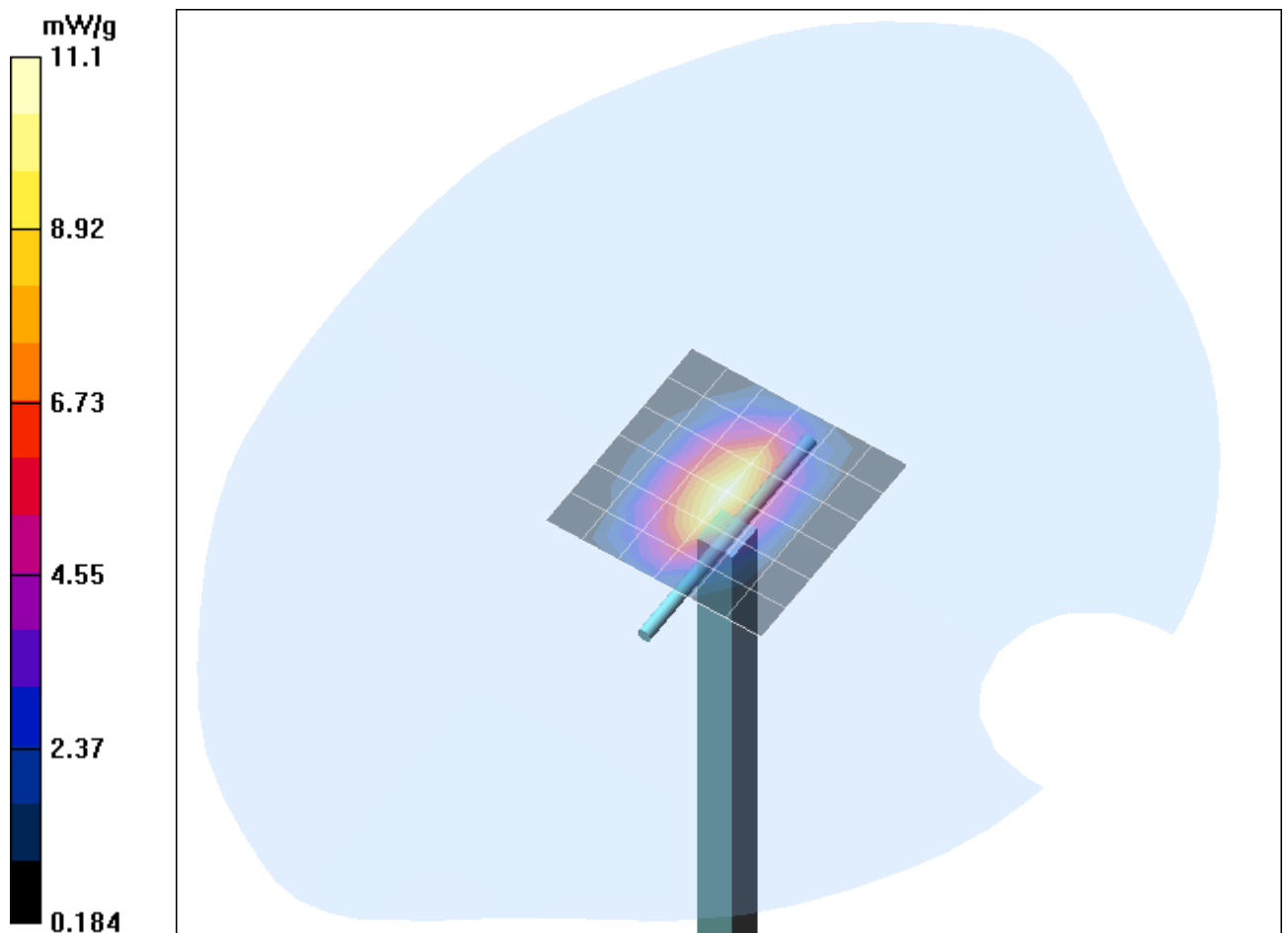


Fig. 11: Validation measurement 1900 MHz body (October 01, 2008), coarse grid.
 Ambient Temperature: 22.0° C, Liquid Temperature: 21.1° C.

| 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 10: 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 | V4.7 | N/A | N/A | N/A |
| Software Versions SEMCAD | V1.8 | N/A | N/A | N/A |
| Dosimetric E-Field Probe | ET3DV6 | 1579 | 01/2008 | 01/2009 |
| Dosimetric E-Field Probe | EX3DV4 | 3536 | 09/2008 | 09/2009 |
| Data Acquisition Electronics | DAE 3 | 335 | 02/2008 | 02/2009 |
| Data Acquisition Electronics | DAE 4 | 631 | 09/2008 | 09/2009 |
| 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 | 12/2007 | 12/2009 |
| Validation Dipole | D1900V2 | 5d051 | 09/2007 | 09/2009 |
| Material Measurement | | | | |
| Network Analyzer | E5071C | MY46103220 | 01/2008 | 01/2009 |
| Dielectric Probe Kit | HP85070B | US33020263 | N/A | N/A |

Table 11: SAR equipment.

| Test Equipment | Model | Serial Number | Last Calibration | Next Calibration |
|-----------------------|----------------|---------------|------------------|------------------|
| Power Meters | | | | |
| Power Meter, Agilent | E4416A | GB41050414 | 12/2006 | 12/2008 |
| Power Meter, Agilent | E4417A | GB41050441 | 12/2006 | 12/2008 |
| Power Meter, Anritsu | ML2487A | 6K00002319 | 11/2007 | 11/2009 |
| Power Meter, Anritsu | ML2488A | 6K00002078 | 11/2007 | 11/2009 |
| Power Sensors | | | | |
| Power Sensor, Agilent | E9301H | US40010212 | 12/2006 | 12/2008 |
| Power Sensor, Agilent | E9301A | MY41495584 | 12/2006 | 12/2008 |
| Power Sensor, Anritsu | MA2481B | 031600 | 12/2007 | 12/2009 |
| Power Sensor, Anritsu | MA2490A | 031565 | 12/2007 | 12/2009 |
| RF Sources | | | | |
| Network Analyzer | Agilent E5071C | MY46103220 | 01/2008 | 01/2009 |
| 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 | 01/2008 | 01/2009 |
| Willtek | 4202S | 0813151 | N/A | N/A |

Table 12: Test equipment, General.

8.8 Certificates of conformity

Schmid & Partner Engineering AG

s p e a g

Zeughausstrasse 43, 8004 Zurich, Switzerland
 Phone +41 44 245 9700, Fax +41 44 245 9779
 info@speag.com, http://www.speag.com

Certificate of conformity

| | |
|-----------------------|--|
| Item | Dosimetric Assessment System DASY4 |
| Type No | SD 000 401A, SD 000 402A |
| Software Version No | DASY 4.7 |
| Manufacturer / Origin | Schmid & Partner Engineering AG Zeughausstrasse 43, CH-8004 Zürich, Switzerland |

References

- [1] IEEE 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques, December 2003
- [2] EN 50361:2001, "Basic standard for the measurement of Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz – 3 GHz)", July 2001
- [3] IEC 62209 – 1, "Specific Absorption Rate (SAR) in the frequency range of 300 MHz to 3 GHz – Measurement Procedure, Part 1: Hand-held mobile wireless communication devices", February 2005
- [4] IEC 62209 – 2, Draft Version 0.9, "Evaluation of Human Exposure to Radio Frequency Fields from Handheld and Body-Mounted Wireless Communication Devices in the Frequency Range of 30 MHz to 6 GHz: Human models, Instrumentation and Procedures Part 2: Procedure to determine the Specific Absorption Rate (SAR) for ... including accessories and multiple transmitters", December 2004
- [5] OET Bulletin 65, Supplement C, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", Edition 01-01
- [6] ANSI-C63.19-2006, "American National Standard for Methods of Measurement of Compatibility between Wireless Communication Devices and Hearing Aids", June 2006
- [7] ANSI-C63.19-2007, "American National Standard for Methods of Measurement of Compatibility between Wireless Communication Devices and Hearing Aids", June 2007

Conformity

We certify that this system is designed to be fully compliant with the standards [1 – 7] for RF emission tests of wireless devices.

Uncertainty

The uncertainty of the measurements with this system was evaluated according to the above standards and is documented in the applicable chapters of the DASY4 system handbook.

The uncertainty values represent current state of methodology and are subject to changes. They are applicable to all laboratories using DASY4 provided the following requirements are met (responsibility of the system end user):

- 1) the system is used by an experienced engineer who follows the manual and the guidelines taught during the training provided by SPEAG,
- 2) the probe and validation dipoles have been calibrated for the relevant frequency bands and media within the requested period,
- 3) the DAE has been calibrated within the requested period,
- 4) the "minimum distance" between probe sensor and inner phantom shell and the radiation source is selected properly,
- 5) the system performance check has been successful,
- 6) the operational mode of the DUT is CW, CDMA, FDMA or TDMA (GSM, DCS, PCS, IS136, PDC) and the measurement/integration time per point is ≥ 500 ms,
- 7) if applicable, the probe modulation factor is evaluated and applied according to field level, modulation and frequency,
- 8) the dielectric parameters of the liquid are conformant with the standard requirement,
- 9) the DUT has been positioned as described in the manual.
- 10) the uncertainty values from the calibration certificates, and the laboratory and measurement equipment dependent uncertainties, are updated by end user accordingly.

Date 24.4.2008

Signature / Stamp

Doc No 880 – SD00040XA-Standards_0804 – F

KP/FB

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Fig. 12: Certificate of conformity for the used DASY4 system

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

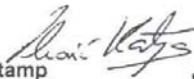
- [1] CENELEC EN 50361
- [2] IEEE P1528-200x draft 6.5
- [3] IEC PT 62209 draft 0.9
- (*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of [1] and [3].

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**



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Doc No 881 – QD 000 P40 BA – B

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Fig. 13: Certificate of conformity for the used SAM phantom.

8.9 Pictures of the device under test

Fig. 14 – 15 show the device under test and the used accessories.



Fig. 14: Pictures of the device under test



Fig. 15: Used headset, KX-TCA95.

8.10 Test Positions for the Device under Test

Fig. 16 - 21 show the test positions for the SAR measurements.

Confidential

Fig. 16: Cheek position, left side.

Confidential

Fig. 17: Tilted position, left side.

Confidential

Fig. 18: Cheek position, right side.

Confidential

Fig. 19: Tilted position, right side.

Confidential

Fig. 20: Body worn, antenna 1 or antenna 2 configuration, with headset, display towards the phantom.

Confidential

Fig. 21: Body worn, antenna 1 or antenna 2 configuration, with headset, display towards the ground.

8.11 Pictures to demonstrate the required liquid depth

Fig. 22 show the liquid depth in the used SAM phantom.



Fig. 22: Liquid depth for GSM 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 C95.1-1999] 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 C95.1-2005] IEEE Std C95.1-2005: 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., 2005.
- [ICNIRP 1998] ICNIRP: Guidelines for Limiting Exposure to Time-varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz), In: Health Physics, Vol. 74, No. 4, 494-522, 1998.
- [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. April 2008
- [FCC 96-326] FCC 96-326, ET Docket No. 93-62, Report and Order, August 1, 1996