



SAR COMPLIANCE EVALUATION REPORT

Applicant Name:
Motorola Mobility, Inc.
8000 West Sunrise Blvd.
Plantation, FL 33322
United States

Date of Testing:
09/15/11 - 10/06/11, 10/12/11 & 10/18/11
Test Site/Location:
PCTEST Lab, Columbia, MD, USA
Test Report Serial No.:
0Y1110111795-R2.IHD

FCC ID: IHDP56MD2

APPLICANT: MOTOROLA MOBILITY, INC.

EUT Type: Portable Handset
Application Type: Class II Permissive Change
FCC Rule Part(s): CFR §2.1093; FCC/OET Bulletin 65 Supplement C [June 2001]
Test Device Serial No.: Pre-Production [S/N: TA19302NZ4, TA19301C5G, LSNW230069, TA19301C3G]
Class II Permissive Changes:
1. Removing Power Reduction for Wireless Router WCDMA1900 operations
2. Adding Lapdock
Date of Original Grant: 09/23/2011

Band & Mode	Tx Frequency	Conducted Power [dBm]	SAR			
			1 gm Head (W/kg)	1 gm Body-Worn (W/kg)	1 gm Hotspot (W/kg)	1 gm Lapdock (W/kg)
GSM/GPRS/EDGE 850	824.20 - 848.80 MHz	32.99	N/A	N/A	N/A	0.62
WCDMA/HSPA 850	826.40 - 846.60 MHz	23.87	N/A	N/A	N/A	0.52
Cell. CDMA/EVDO	824.70 - 848.31 MHz	25.19	N/A	N/A	N/A	0.75
GSM/GPRS/EDGE 1900	1850.20 - 1909.80 MHz	30.75	N/A	N/A	N/A	0.10
WCDMA/HSPA 1900	1852.4 - 1907.6 MHz	23.67	0.21	0.15	1.30	0.12
2.4 GHz WLAN	2412 - 2462 MHz	17.84	N/A	N/A	N/A	0.03
Bluetooth	2402 - 2480 MHz	9.05	N/A	N/A	N/A	N/A
Simultaneous SAR per KDB 690783 DR01:			1.30 W/kg			

Power in the above table represent output powers applicable for the SAR test configurations and may not represent the highest output powers for all capabilities.

This permissive change is to remove power reduction for WCDMA1900 during wireless router configurations. This evaluation is for WCDMA1900 only for head, body-worn accessory and hotspot since there was no change to any other mode or band. All bands were evaluated to add lapdock accessory.

Note: This revised Test Report (S/N: 0Y1110111795-R2.IHD) supersedes and replaces the previously issued test report on the same subject EUT for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001), IEEE 1528-2003 and in applicable Industry Canada Radio Standards Specifications (RSS); for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.


Randy Ortanez
President



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1 INTRODUCTION

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [24]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

1.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 1-1).

$$SAR = \frac{d}{dt} \left(\frac{dU}{dm} \right) = \frac{d}{dt} \left(\frac{dU}{\rho dv} \right)$$

Figure 1-1
SAR Mathematical Equation

SAR is expressed in units of Watts per Kilogram (W/kg).

$$SAR = \frac{\sigma \cdot E^2}{\rho}$$

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m^3)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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2 TEST SITE LOCATION

2.1 INTRODUCTION

The map at the right shows the location of the PCTEST LABORATORY in Columbia, Maryland. It is in proximity to the FCC Laboratory, the Baltimore-Washington International (BWI) airport, the city of Baltimore and Washington, DC.

These measurement tests were conducted at the PCTEST Engineering Laboratory, Inc. facility in New Concept Business Park, Guilford Industrial Park, Columbia, Maryland. The site address is 6660-B Dobbin Road, Columbia, MD 21045. The test site is one of the highest points in the Columbia area with an elevation of 390 feet above mean sea level. The site coordinates are 39° 11'15" N latitude and 76° 49' 38" W longitude. The facility is 1.5 miles north of the FCC laboratory, and the ambient signal and ambient signal strength are approximately equal to those of the FCC laboratory. There are no FM or TV transmitters within 15 miles of the site. The detailed description of the measurement facility was found to be in compliance with the requirements of § 2.948 according to ANSI C63.4 on January 27, 2006 and Industry Canada.



Figure 2-1

Map of the Greater Baltimore and Metropolitan Washington, D.C. area

2.2 Test Facility / Accreditations:

Measurements were performed at an independent accredited PCTEST Engineering Lab located in Columbia, MD 21045, U.S.A.



- PCTEST Lab is accredited to ISO 17025-2005 by the American Association for Laboratory Accreditation (A2LA) in Specific Absorption Rate (SAR) testing, Hearing-Aid Compatibility (HAC), Battery Safety, CTIA Test Plans, and wireless testing for FCC and Industry Canada Rules.
- PCTEST Lab is accredited to ISO 17025 by U.S. National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP Lab code: 100431-0) in EMC, FCC and Telecommunications.
- PCTEST facility is an FCC registered (PCTEST Reg. No. 90864) test facility with the site description report on file and has met all the requirements specified in Section 2.948 of the FCC Rules and Industry Canada (IC-2451).
- PCTEST Lab is a recognized U.S. Conformity Assessment Body (CAB) in EMC and R&TTE (n.b. 0982) under the U.S.-EU Mutual Recognition Agreement (MRA).
- PCTEST TCB is a Telecommunication Certification Body (TCB) accredited to ISO/IEC Guide 65 by the American National Standards Institute (ANSI) in all scopes of FCC Rules and all Industry Canada Standards (RSS).
- PCTEST facility is an IC registered (IC-2451) test laboratory with the site description on file at Industry Canada.
- PCTEST is a CTIA Authorized Test Laboratory (CATL) for AMPS and CDMA, and EvDO mobile phones.
- PCTEST is a CTIA Authorized Test Laboratory (CATL) for Over-the-Air (OTA) Antenna Performance testing for AMPS, CDMA, GSM, GPRS, EGPRS, UMTS (W-CDMA), CDMA 1xEVDO Data, CDMA 1xRTT Data

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3 SAR MEASUREMENT SETUP

3.1 Robotic System

Measurements are performed using the DASY4 automated dosimetric assessment system. The DASY4 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of a high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the SAM phantom containing the head or body equivalent material. The robot is a six-axis industrial robot, performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Figure 3-1).

3.2 System Hardware

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the SAR Measurement Software DASY4, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, A/D conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal from the DAE and transfers data to the PC card.

3.3 System Electronics

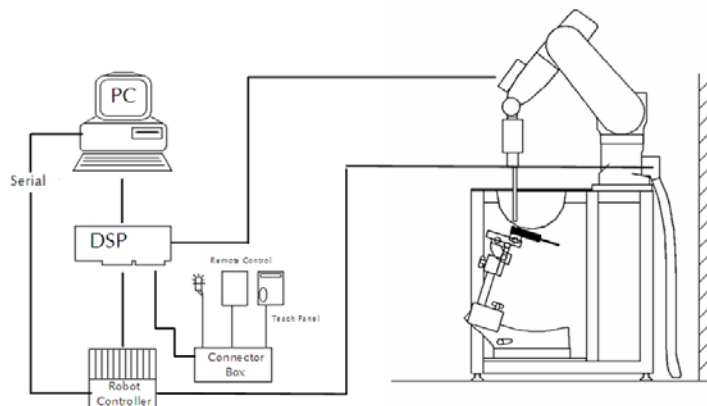


Figure 3-1
SAR Measurement System Setup

The DAE consists of a highly sensitive electrometer-grade auto-zeroing preamplifier, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.

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3.4 Automated Test System Specifications

Test Software: SPEAG DASY4 version 4.7 Measurement Software
Robot: Stäubli Unimation Corp. Robot RX60L
Repeatability: 0.02 mm
No. of Axes: 6

Data Acquisition Electronic System (DAE)

Data Converter

Features: Signal Amplifier, multiplexer, A/D converter & control logic
Software: SEMCAD software
Connecting Lines: Optical Downlink for data and status info
Optical upload for commands and clock

PC Interface Card

Function: Link to DAE
16-bit A/D converter for surface detection system
Two Serial & Ethernet link to robotics
Direct emergency stop output for robot

Phantom

Type: SAM Twin Phantom (V4.0)
Shell Material: Composite
Thickness: 2.0 ± 0.2 mm



Figure 3-2
SAR Measurement System

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4.1 Probe Measurement System



Figure 4-1
SAR System

The SAR measurements were conducted with the dosimetric probe designed in the classical triangular configuration (see Figure 4-3) and optimized for dosimetric evaluation [9]. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi-fiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY4 software reads the reflection during a software approach and looks for the

maximum using a 2nd order curve fitting (see Figure 5-1). The approach is stopped at reaching the maximum.

4.2 Probe Specifications

Model(s):	ES3DV2, ES3DV3, EX3DV4
Frequency	10 MHz – 6.0 GHz (EX3DV4)
Range:	10 MHz – 4 GHz (ES3DV3)
Calibration:	In head and body simulating tissue at Frequencies from 300 up to 6000MHz
Linearity:	± 0.2 dB (30 MHz to 6 GHz) for EX3DV4 ± 0.2 dB (30 MHz to 4 GHz) for ES3DV3
Dynamic Range:	10 mW/kg – 100 W/kg
Probe Length:	330 mm
Probe Tip	
Length:	20 mm
Body Diameter:	12 mm
Tip Diameter:	2.5 mm (3.9mm for ES3DV3)
Tip-Center:	1 mm (2.0 mm for ES3DV3)
Application:	SAR Dosimetry Testing Compliance tests of mobile phones Dosimetry in strong gradient fields



Figure 4-2
Near-Field Probe



Figure 4-3
Triangular Probe Configuration

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5 PROBE CALIBRATION PROCESS

5.1 Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. A TEM cell calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm²) using an RF Signal generator, TEM cell, and RF Power Meter.

5.2 Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm².

5.3 Temperature Assessment

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$SAR = C \frac{\Delta T}{\Delta t}$$

where:

Δt = exposure time (30 seconds),
 C = heat capacity of tissue (brain or muscle),
 ΔT = temperature increase due to RF exposure.

$$SAR = \frac{|E|^2 \cdot \sigma}{\rho}$$

where:

σ = simulated tissue conductivity,
 ρ = Tissue density (1.25 g/cm³ for brain tissue)

SAR is proportional to $\Delta T/\Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

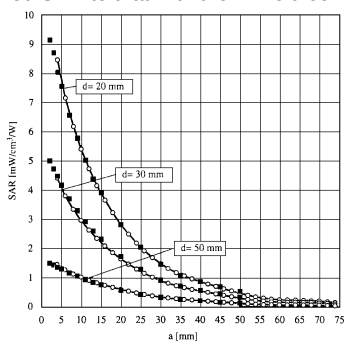


Figure 5-1 E-Field and Temperature measurements at 900MHz [9]

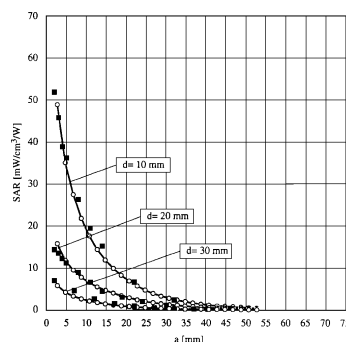


Figure 5-2 E-Field and temperature measurements at 1.9GHz [9]

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6 PHANTOM AND EQUIVALENT TISSUES

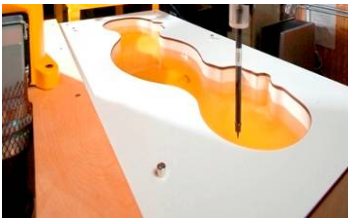
6.1 SAM Phantoms



**Figure 6-1
SAM Phantoms**

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a table. The shape of the shell is based on data from an anatomical study designed to represent the 90th percentile of the population [12][13]. The phantom enables the dosimetric evaluation of SAR for both left and right handed handset usage, as well as body-worn usage using the flat phantom region. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. The shell phantom has a 2mm shell thickness (except the ear region where shell thickness increases to 6 mm).

6.2 Tissue Simulating Mixture Characterization



**Figure 6-2
SAM Phantom with
Simulating Tissue**

**Table 6-1
Composition of the Tissue Equivalent Matter**

Frequency (MHz)	835	1900	1900	2450
Tissue	Body	Head	Body	Body
Ingredients (% by weight)				
Bactericide	0.1			
DGBE		44.92	29.44	26.7
HEC	1			
NaCl	0.94	0.18	0.39	0.1
Sucrose	44.9			
Water	53.06	54.9	70.17	73.2

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7.1 Measurement Procedure

The evaluation was performed using the following procedure:

1. The SAR distribution at the exposed side of the head was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm x 15mm.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during testing the 1 gram cube. This fixed point was measured and used as a reference value.
3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 32mm x 32mm x 30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5 x 5 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual for more details):
 - a. The data was extrapolated to the surface of the outer-shell of the phantom. The combined distance extrapolated was the combined distance from the center of the dipoles 2.7mm away from the tip of the probe housing plus the 1.2 mm distance between the surface and the lowest measuring point. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete. If the value deviated by more than 5%, the SAR evaluation was repeated.

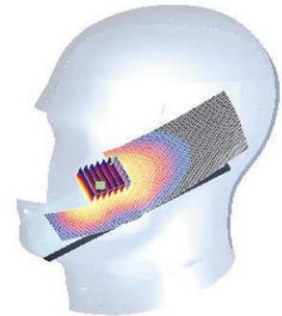


Figure 7-1
Sample SAR Area Scan

7.2 Specific Anthropomorphic Mannequin (SAM) Specifications

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Figure 7-2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimize reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15 cm.



Figure 7-2
SAM Twin Phantom Shell

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8

DEFINITION OF REFERENCE POINTS

8.1 EAR REFERENCE POINT

Figure 8-1 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 8-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 8-2). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].

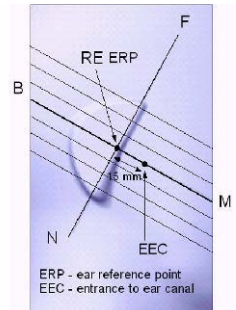


Figure 8-1
Close-Up Side view
of ERP

8.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the "test device reference point" located along the "vertical centerline" on the front of the device aligned to the "ear reference point" (See Figure 8-3). The "test device reference point" was then located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at it's top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.



Figure 8-2
Front, back and side view of SAM Twin Phantom

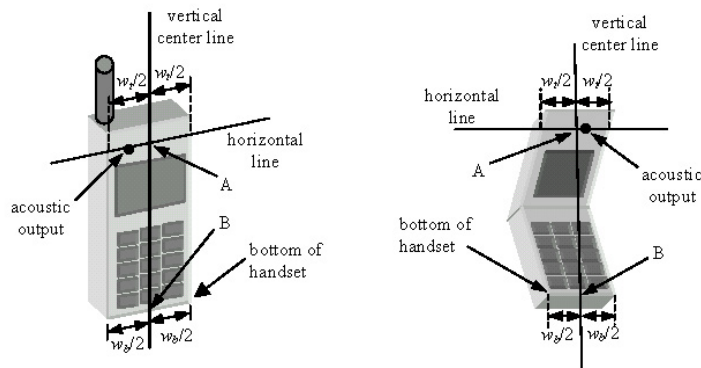


Figure 8-3
Handset Vertical Center & Horizontal Line Reference Points

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9 TEST CONFIGURATION POSITIONS

9.1 Device Holder

The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$.

9.2 Positioning for Cheek/Touch

1. The test device was positioned with 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 Figure 9-1), 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.

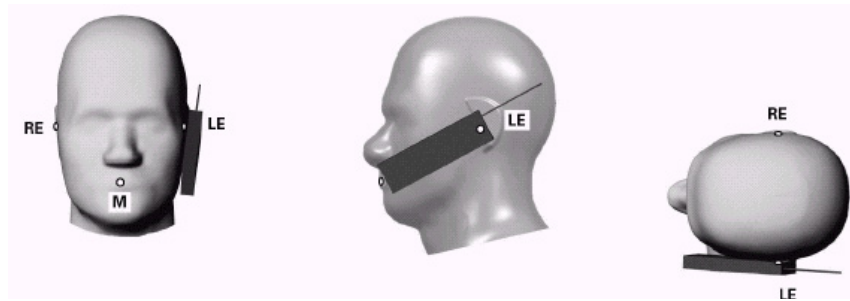


Figure 9-1 Front, Side and Top View of Cheek/Touch Position

2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the ear.
3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the plane normal to MB-NF including the line MB (reference plane).
4. The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical with respect to the line NF.
5. 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, the handset was rotated about the line NF until any point on the handset made contact with a phantom point below the ear (cheek) (See Figure 9-2).

9.3 Positioning for Ear / 15° Tilt

With the test device aligned in the “Cheek/Touch Position”:

1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15 degree.
2. The phone was then rotated around the horizontal line by 15 degree.
3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the phone touches the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. The tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 9-2).

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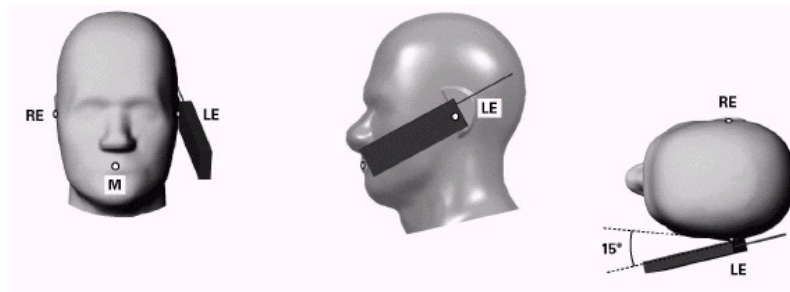


Figure 9-2 Front, Side and Top View of Ear/15° Tilt Position

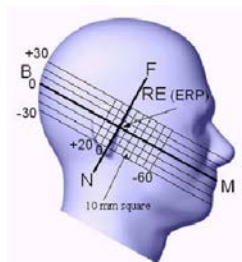


Figure 9-3
Side view w/ relevant markings



Figure 9-4 Body SAR Sample Photo
(Not Actual EUT)

9.4 SAR Evaluations near the Mouth/Jaw Regions of the SAM Phantom

Antennas located near the bottom of a phone may require SAR measurements around the mouth and jaw regions of the SAM head phantom. This typically applies to clam-shell style phones that are generally longer in the unfolded normal use positions or to certain older style long rectangular phones. It has been known for some time that there are SAR measurement difficulties in these regions of the SAM phantom. SAR probes are calibrated in tissue equivalent liquids with sufficient separation between the probe sensors and nearby physical boundaries to ensure scattering does not affect probe calibration. When the probe tip is moved into tight regions with multiple boundaries surrounding its sensors, probe calibration and measurement accuracy can become questionable. In addition, these measurement locations often require a probe to be tilted at steep angles, where it may no longer comply with calibration requirements and measurement protocols, or satisfy the required measurement uncertainty. In some situations it is not feasible to tilt the probe or rotate the phantom, as suggested by measurement standards, to conduct these measurements.

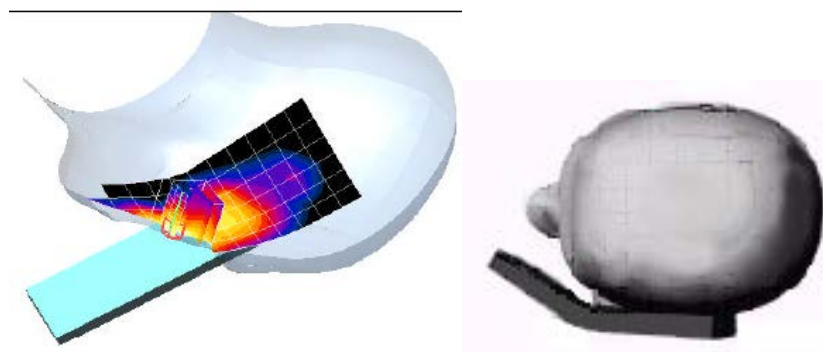


Figure 9-5
SAR Scans near the Jaw/Mouth

In order to ensure there is sufficient conservativeness for ensuring compliance until practical solutions are available, additional measurement considerations are necessary to address these technical difficulties. When measurements are required near the mouth, nose, jaw or similar tight regions of the SAM phantom,

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area or zoom scans are often unable to fully enclose the peak SAR location as required by IEEE 1528 and Supplement C, due to probe orientation and positioning difficulties. Even when limited measurements are possible, the test results could be questionable due to probe calibration and measurement uncertainty issues. Under these circumstances, the following procedures apply, adopted from the FCC guidance on SAR handsets document publication 648474. The SAR required in these regions of SAM should be measured using a flat phantom. **Rectangular shaped phones** should be positioned with its bottom edge positioned from the flat phantom with the same distance provided by the cheek touching position using SAM. The ear reference point (ERP, as defined for SAM) of the phone should be positioned ½ cm from the flat phantom shell. **Clam-shell phones** should be positioned with the hinge against a smooth edge of the flat phantom where the upper half of the phone is unfolded and extended beyond the phantom side wall. The lower half of the phone is secured in the test device holder at a fixed distance below the flat phantom determined by the minimum separation along the lower edge of the phone in the cheek touching position using SAM. Any case with substantial variation in separation distance along the lower edge of a clam shell is discussed with the FCC for best-to-use methodology.

The flat phantom data should allow test results to be compared uniformly across measurement systems, until suitable solutions are available in measurement standards to address certain probe calibration and positioning issues, due to implementation differences between horizontal and upright SAM configurations. These flat phantom procedures are only applicable for stand-alone SAR evaluation in tight regions of the SAM phantom, where measurement is not feasible or test results can be questionable due to probe calibration and accessibility issues. Details on device positioning and photos showing how separation distances are determined are included in the SAR report Photographs. SAR for other regions of the head must be evaluated using SAM; therefore, a phone with antennas at different locations may require flat and SAM phantom evaluation for the different antennas.

9.5 Body Holster /Belt Clip Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 9-4). A device with a headset output is tested with a headset connected to the device.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used. Test position spacing was documented.

Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.

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10 FCC RF EXPOSURE LIMITS

10.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

10.2 Controlled Environment

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 10-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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11 FCC 3G MEASUREMENT PROCEDURES

Power measurements were performed using a base station simulator under digital average power.

11.1 Procedures Used to Establish RF Signal for SAR

The following procedures are according to FCC KDB Publication 941225 D01 "SAR Measurement Procedures for 3G Devices" v02, October 2007.

The device was placed into a simulated call using a base station simulator in a RF shielded chamber. Establishing connections in this manner ensure a consistent means for testing SAR and are recommended for evaluating SAR [4]. Devices under test were evaluated prior to testing, with a fully charged battery and were configured to operate at maximum output power. In order to verify that the device was tested throughout the SAR test at maximum output power, the SAR measurement system measures a "point SAR" at an arbitrary reference point at the start and end of the 1 gram SAR evaluation, to assess for any power drifts during the evaluation. When the power drift was more than 5%, the SAR test was repeated.

11.2 Measurement Conditions for CDMA2000

The following procedures were performed according to FCC KDB Publication 941225 D01 "SAR Measurement Procedures for 3G Devices" v02, October 2007.

11.2.1 Output Power Verification

See 3GPP2 C.S0011/TIA-98-E as recommended by "SAR Measurement Procedures for 3G Devices" v02, October 2007. Maximum output power is verified on the High, Middle and Low channels according to procedures in section 4.4.5.2 of 3GPP2 C.S0011/TIA-98-E. SO55 tests were measured with power control bits in the "All Up" condition.

1. If the mobile station (MS) supports Reverse TCH RC 1 and Forward TCH RC 1, set up a call using Fundamental Channel Test Mode 1 (RC=1/1) with 9600 bps data rate only.
2. Under RC1, C.S0011 Table 4.4.5.2-1, Table 9-1 parameters were applied.
3. If the MS supports the RC 3 Reverse FCH, RC3 Reverse SCH₀ and demodulation of RC 3,4, or 5, set up a call using Supplemental Channel Test Mode 3 (RC 3/3) with 9600 bps Fundamental Channel and 9600 bps SCH0 data rate.
4. Under RC3, C.S0011 Table 4.4.5.2-2, Table 13-2 was applied.
5. FCHs were configured at full rate for maximum SAR with "All Up" power control bits.

Table 9-1
Parameters for Max. Power for RC1

Parameter	Units	Value
$\frac{I_{or}}{I_{or}}$	dBm/1.23 MHz	-104
$\frac{Pilot E_c}{I_{or}}$	dB	-7
$\frac{Traffic E_c}{I_{or}}$	dB	-7.4

Table 9-2
Parameters for Max. Power for RC3

Parameter	Units	Value
$\frac{I_{or}}{I_{or}}$	dBm/1.23 MHz	-86
$\frac{Pilot E_c}{I_{or}}$	dB	-7
$\frac{Traffic E_c}{I_{or}}$	dB	-7.4

11.2.2 Body SAR Measurements

SAR for body exposure configurations is measured in RC3 with the DUT configured to transmit at full rate on FCH with all other code channels disabled using TDSO / SO32. SAR for multiple code channels (FCH + SCH_n) is not required when the maximum average output of each RF channel is less than ¼ dB higher than that measured with FCH only. Otherwise, SAR is

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measured on the maximum output channel (FCH + SCH_n) with FCH at full rate and SCH₀ enabled at 9600 bps using the exposure configuration that results in the highest SAR for that channel with FCH only. When multiple code channels are enabled, the DUT output may shift by more than 0.5 dB and lead to higher SAR drifts and SCH dropouts. Body SAR was measured using TDSO / SO32 with power control bits in the "All Up"

Body SAR in RC1 is not required when the maximum average output of each channel is less than ¼ dB higher than that measured in RC3. Otherwise, SAR is measured on the maximum output channel in RC1; with Loopback Service Option SO55, at full rate, using the body exposure configuration that results in the highest SAR for that channel in RC3.

11.2.3 Body SAR Measurements for EVDO Data Devices

Hotspot Body SAR is measured using Subtype 0/1 Physical Layer configurations for Rev. 0. SAR for Subtype 2 Physical layer configurations is not required for Rev. A when the maximum average output of each RF channels is less than that measured in Subtype 0/1 Physical layer configurations. Otherwise, SAR is measured on the maximum output channel for Rev. A using the exposure configuration that results in the highest SAR for the RF channels in Rev. 0. The AT is tested with a Reverse Data Channel rate of 153.6 kbps in Subtype 0/1 Physical Layer configurations; and a Reverse Data Channel payload size of 4096 bits and Termination Target of 16 slots in Subtype 2 Physical Layer configurations. Both FTAP and FETAP are configured with a Forward Traffic Channel data rate corresponding to the 2-slot version of 307.2 kbps with the ACK Channel transmitting in all slots. AT power control should be in "All Bits Up" conditions for TAP/ETAP.

11.3 SAR Measurement Conditions for WCDMA per FCC KDB Pub. 941225

11.3.1 Output Power Verification

Maximum output power is measured on the High, Middle and Low channels for each applicable transmission band according to the general descriptions in section 5.2 of 3GPP TS 34.121, using the appropriate RMC or AMR with TPC (transmit power control) set to all "1s".

11.3.2 Head SAR Measurements for Handsets

SAR for head exposure configurations is measured using the 12.2 kbps RMC with TPC bits configured to all "1s". SAR in AMR configurations is not required when the maximum average output of each RF channel for 12.2 kbps AMR is less than 0.25 dB higher than that measured in 12.2 kbps RMC. Otherwise, SAR is measured on the maximum output channel in 12.2 AMR with a 3.4 kbps SRB (signaling radio bearer) using the exposure configuration that resulted in the highest SAR for that RF channel in the 12.2 kbps RMC mode.

11.3.3 Body SAR Measurements

SAR for body exposure configurations is measured using the 12.2 kbps RMC with the TPC bits all "1s".

11.3.4 SAR Measurements for Handsets with Rel 5 HSDPA

Body SAR for HSDPA is not required for handsets with HSDPA capabilities when the maximum average output power of each RF channel with HSDPA active is less than 0.25 dB higher than that measured without HSDPA using 12.2 kbps RMC and the maximum SAR for 12.2 kbps RMC is ≤ 75% of the SAR limit. Otherwise, SAR is measured for HSDPA, using an FRC with H-Set 1 in

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Sub-test 1 and a 12.2 kbps RMC configured in Test Loop Mode 1, using the highest body SAR configuration measured in 12.2 kbps RMC without HSDPA, on the maximum output channel with the body exposure configuration that resulted in the highest SAR in 12.2 kbps RMC mode for that RF channel.

The H-set used in FRC for HSDPA should be configured according to the UE category of a test device. The number of HS-DSCH/HSPDSCHs, HARQ processes, minimum inter-TTI interval, transport block sizes and RV coding sequence are defined by the applicable H-set. To maintain a consistent test configuration and stable transmission conditions, QPSK is used in the FRC for SAR testing. HS-DPCCH should be configured with a CQI feedback cycle of 2 ms to maintain a constant rate of active CQI slots. DPCCH and DPDCH gain factors of $\beta_c=9$ and $\beta_d=15$, and power offset parameters of $\Delta_{ACK} = \Delta_{NACK} = 5$ and $\Delta_{CQI}=2$ is used. The CQI value is determined by the UE category, transport block size, number of HS-PDSCHs and modulation used in the FRC.

11.3.5 SAR Measurements for Handsets with Rel 6 HSUPA

Body SAR for HSUPA is not required when the maximum average output of each RF channel with HSUPA/HSDPA active is less than 0.25 dB higher than as measured without HSUPA/HSDPA using 12.2 kbps RMC and maximum SAR for 12.2 kbps RMC is $\leq 75\%$ of the SAR limit. Otherwise SAR is measured on the maximum output channel for the body exposure configuration produced highest SAR in 12.2 kbps RMC for that RF channel, using the additional procedures under "Release 6 HSPA data devices"

Head SAR for VOIP operations under HSPA is not required when maximum average output of each RF channel with HSPA is less than 0.25 dB higher than as measured using 12.2 kbps RMC. Otherwise SAR is measured using same HSPA configuration as used for body SAR.

Sub-test	β_c	β_d	β_d (SF)	β_c/β_d	$\beta_{1s}^{(1)}$	β_{ec}	β_{ed}	β_{ed} (SF)	β_{ed} (codes)	CM ⁽²⁾ (dB)	MPR (dB)	AG ⁽⁴⁾ Index	E-TFCI
1	11/15 ⁽³⁾	15/15 ⁽³⁾	64	11/15 ⁽³⁾	22/15	209/225	1039/225	4	1	1.0	0.0	20	75
2	6/15	15/15	64	6/15	12/15	12/15	94/75	4	1	3.0	2.0	12	67
3	15/15	9/15	64	15/9	30/15	30/15	$\beta_{ed1}: 47/15$ $\beta_{ed2}: 47/15$	4	2	2.0	1.0	15	92
4	2/15	15/15	64	2/15	4/15	2/15	56/75	4	1	3.0	2.0	17	71
5	15/15 ⁽⁴⁾	15/15 ⁽⁴⁾	64	15/15 ⁽⁴⁾	30/15	24/15	134/15	4	1	1.0	0.0	21	81

Note 1: Δ_{ACK} , Δ_{NACK} and $\Delta_{CQI} = 8 \Leftrightarrow A_{1s} = \beta_{1s}/\beta_c = 30/15 \Leftrightarrow \beta_{1s} = 30/15 * \beta_c$.

Note 2: CM = 1 for $\beta_c/\beta_d = 12/15$, $\beta_{1s}/\beta_c = 24/15$. For all other combinations of DPDCH, DPCCH, HS-DPCCH, E-DPDCH and E-DPCCH the MPR is based on the relative CM difference.

Note 3: For subtest 1 the β_c/β_d ratio of 11/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signaled gain factors for the reference TFC (TF1, TF1) to $\beta_c = 10/15$ and $\beta_d = 15/15$.

Note 4: For subtest 5 the β_c/β_d ratio of 15/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signaled gain factors for the reference TFC (TF1, TF1) to $\beta_c = 14/15$ and $\beta_d = 15/15$.

Note 5: Testing UE using E-DPDCH Physical Layer category 1 Sub-test 3 is not required according to TS 25.306 Table 5.1g.

Note 6: β_{ed} can not be set directly; it is set by Absolute Grant Value.

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11.4 RF Conducted Powers

11.4.1 GSM Conducted Powers

		Maximum Burst-Averaged Output Power								
		Voice	GPRS/EDGE Data (GMSK)				EDGE Data (8-PSK)			
Band	Channel	GSM [dBm] CS (1 Slot)	GPRS [dBm] 1 Tx Slot	GPRS [dBm] 2 Tx Slot	GPRS [dBm] 3 Tx Slot	GPRS [dBm] 4 Tx Slot	EDGE [dBm] 1 Tx Slot	EDGE [dBm] 2 Tx Slot	EDGE [dBm] 3 Tx Slot	EDGE [dBm] 4 Tx Slot
Cellular	128	33.47	33.54	31.33	28.93	27.67	27.28	25.27	23.42	21.21
	190	32.99	33.13	31.64	29.47	27.31	27.11	25.51	23.31	21.61
	251	33.09	33.26	31.92	29.81	27.55	27.19	25.63	23.42	21.96
PCS	512	30.69	30.68	28.39	26.04	24.00	26.93	23.84	22.79	20.61
	661	30.75	30.79	28.32	25.80	23.67	26.69	23.58	22.46	20.36
	810	30.24	30.24	27.99	25.56	23.06	26.64	23.42	22.23	20.14

		Calculated Maximum Frame-Averaged Output Power								
		Voice	GPRS/EDGE Data (GMSK)				EDGE Data (8-PSK)			
Band	Channel	GSM [dBm] CS (1 Slot)	GPRS [dBm] 1 Tx Slot	GPRS [dBm] 2 Tx Slot	GPRS [dBm] 3 Tx Slot	GPRS [dBm] 4 Tx Slot	EDGE [dBm] 1 Tx Slot	EDGE [dBm] 2 Tx Slot	EDGE [dBm] 3 Tx Slot	EDGE [dBm] 4 Tx Slot
Cellular	128	24.44	24.51	25.31	24.67	24.66	18.25	19.25	19.16	18.20
	190	23.96	24.10	25.62	25.21	24.30	18.08	19.49	19.05	18.60
	251	24.06	24.23	25.90	25.55	24.54	18.16	19.61	19.16	18.95
PCS	512	21.66	21.65	22.37	21.78	20.99	17.90	17.82	18.53	17.60
	661	21.72	21.76	22.30	21.54	20.66	17.66	17.56	18.20	17.35
	810	21.21	21.21	21.97	21.30	20.05	17.61	17.40	17.97	17.13

Note: Both burst-averaged and the calculated frame-averaged powers are included. The bolded GPRS/EDGE modes were selected according to the highest frame-averaged output power table according to KDB 941225 D03. Frame averaged power was calculated from the measured burst averaged power by converting the slot powers into linear units and calculating the energy over 8 timeslots.

GPRS/EDGE (GMSK) conducted powers were measured with CS1 and EDGE (8-PSK) conducted powers were measured with MCS7.

Output powers for GSM modes are identical to the original filing since this permissive change is to add an external accessory only.

GSM Class: B
GPRS Multislot class: 12 (max 4 Tx Uplink slots)
EDGE Multislot class: 12 (max 4Tx Uplink slots)
DTM Multislot Class: N/A

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11.4.2 CDMA Conducted Powers

Band	Channel	SO55 [dBm]	SO55 [dBm]	TDSO SO32 [dBm]	TDSO SO32 [dBm]	1x EvDO Rev. 0 [dBm]	1x EvDO Rev. A [dBm]
	F-RC	RC1	RC3	FCH+SCH	FCH	(RTAP)	(RETAP)
Cellular	1013	25.18	25.17	25.19	25.18	25.15	25.18
	384	25.15	25.19	25.20	25.16	25.12	25.19
	777	25.08	24.96	25.05	25.14	25.19	25.18

Note: RC1 is only applicable for IS-95 compatibility. Output powers for CDMA modes are identical to the original filing since this permissive change is to add an external accessory only.

Per KDB Publication 941225 D01:

CDMA Body SAR was tested under EVDO Rev. 0 per FCC 3G Guidance (See Section 9.2.3) per FCC KDB Publication 941225 D01. Rev. A and TDSO32 RC3 tests were not required since the maximum average output of each channel in Rev. A and RC3 (1x RTT) was not more than ¼ dB higher than that measured Rev 0.

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11.4.3 HSPA Conducted Powers

3GPP Release Version	Mode	3GPP 34.121 Subtest	WCDMA 850 [dBm]			WCDMA 1900 [dBm]			β_c	β_d	MPR
			4132	4183	4233	9262	9400	9538			
99	WCDMA	12.2 kbps RMC	24.04	23.87	23.92	23.50	23.59	23.67	-	-	-
99		12.2 kbps AMR	24.06	23.84	23.93	23.41	23.69	23.69	-	-	-
6	HSDPA	Subtest 1	23.65	23.60	23.74	23.17	23.22	23.34	2	15	0
6		Subtest 2	23.68	23.60	23.81	22.96	23.21	23.12	11	15	0
6		Subtest 3	23.12	23.09	23.26	22.51	22.67	22.66	15	8	0.5
6		Subtest 4	23.19	23.10	23.39	22.58	22.74	22.75	15	4	0.5
6	HSUPA	Subtest 1	23.81	23.63	23.79	22.51	22.91	23.20	10	15	0
6		Subtest 2	22.27	22.06	22.15	21.84	22.03	22.17	6	15	2
6		Subtest 3	22.62	22.52	22.72	21.79	22.09	22.03	15	9	1
6		Subtest 4	22.50	22.34	22.41	21.69	21.95	22.38	2	15	2
6		Subtest 5	23.79	23.64	23.63	22.33	22.79	22.96	14	15	0

Output powers for WCDMA 850 are identical to the original filing since this permissive change is to add an external accessory only.

WCDMA SAR was tested under RMC 12.2 kbps with HSPA Inactive per KDB Publication 941225 D01. HSPA SAR was not required when the average output power of the HSPA subtests was not more than 0.25 dB higher than the RMC level and SAR was less than 1.2 W/kg. When the SAR of the RMC level was greater than 1.2 W/kg, the highest SAR per exposure condition was additionally tested with HSDPA Subtest 1.

Differences from expected MPR levels are within the measurement tolerance of 1 dB expected by the manufacturer.



Figure 11-1
Power Measurement Setup

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12 SAR TESTING WITH IEEE 802.11 TRANSMITTERS

Normal network operating configurations are not suitable for measuring the SAR of 802.11 b/g/n transmitters. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset based test mode software to ensure the results are consistent and reliable.

12.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters. The test frequencies should correspond to actual channel frequencies defined for domestic use. SAR for devices with switched diversity should be measured with only one antenna transmitting at a time during each SAR measurement, according to a fixed modulation and data rate. The same data pattern should be used for all measurements.

12.2 Frequency Channel Configurations [27]

802.11 b/g/n operating modes are tested independently according to the service requirements in each frequency band. 802.11 b/g/n modes are tested on channels 1, 6 and 11. These are referred to as the "default test channels". 802.11g/n modes were evaluated only if the output power was 0.25 dB higher than the 802.11b mode.

Table 12-1
802.11 Test Channels per FCC Requirements

Mode	GHz	Channel	Turbo Channel	"Default Test Channels"		
				§15.247 802.11b	802.11g	UNII
802.11 b/g	2.412	1		√	∇	
	2.437	6	6	√	∇	
	2.462	11		√	∇	
802.11a	5.18	36	42 (5.21 GHz)			√
	5.20	40				*
	5.22	44				*
	5.24	48	50 (5.25 GHz)			√
	5.26	52	58 (5.29 GHz)			√
	5.28	56				*
	5.30	60				*
	5.32	64				√
	5.500	100	Unknown			*
	5.520	104				√
	5.540	108				*
	5.560	112				*
	5.580	116				√
	5.600	120				*
	5.620	124				√
	5.640	128				*
	5.660	132				*
	5.680	136				√
	5.700	140				*
UNII or §15.247	5.745	149		√		√
	5.765	153	152 (5.76 GHz)		*	*
	5.785	157		√		*
	5.805	161	160 (5.80 GHz)		*	√
	§15.247	5.825	165	√		

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Table 12-2
IEEE 802.11b Average RF Power

Freq [MHz]	Channel	Data Rate [Mbps]	Measured Average Power [dBm]
2412	1	1	13.6
		2	13.7
		5.5	13.6
		11	13.75
2417	2	1	17.03
		2	16.99
		5.5	17.02
		11	17.11
2437	6	1	17.84
		2	17.2
		5.5	17.54
		11	17.38
2457	10	1	17.46
		2	17.54
		5.5	17.63
		11	17.29
2462	11	1	13.82
		2	13.97
		5.5	13.92
		11	13.96

Table 12-3
IEEE 802.11g Average RF Power

Freq [MHz]	Channel	Data Rate [Mbps]	Measured Average Power [dBm]
2412	1	6	10.73
		9	10.76
		12	10.72
		18	10.75
		24	10.7
		36	10.7
		48	10.67
		54	10.66
2417	2	6	16.39
		9	16.33
		12	16.53
		18	16.68
		24	16.45
		36	16.66
		48	16.42
		54	16.46
2437	6	6	16.55
		9	16.67
		12	16.61
		18	16.65
		24	16.4
		36	16.64
		48	16.44
		54	16.68
2457	10	6	14.65
		9	14.6
		12	14.33
		18	14.04
		24	14.72
		36	14.76
		48	14.68
		54	14.32
2462	11	6	10.84
		9	10.85
		12	10.87
		18	10.9
		24	10.81
		36	10.95
		48	10.75
		54	10.8

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Table 12-4
IEEE 802.11n (800ns) Average RF Power

Freq [MHz]	Channel	MCS Index	Data Rate [Mbps]	Measured Average Power [dBm]
2412	1	0	6.5	9.50
		1	13	9.20
		2	19.5	9.20
		3	26	9.16
		4	39	9.20
		5	52	9.22
		6	58.5	9.15
		7	65	9.20
2417	2	0	6.5	14.30
		1	13	14.19
		2	19.5	14.04
		3	26	13.98
		4	39	12.77
		5	52	12.88
		6	58.5	12.72
		7	65	12.96
2437	6	0	6.5	14.47
		1	13	14.34
		2	19.5	14.72
		3	26	14.20
		4	39	13.51
		5	52	13.58
		6	58.5	13.51
		7	65	13.13
2457	10	0	6.5	14.07
		1	13	13.76
		2	19.5	14.03
		3	26	13.86
		4	39	13.10
		5	52	13.09
		6	58.5	12.93
		7	65	13.31
2462	11	0	6.5	9.70
		1	13	9.50
		2	19.5	9.40
		3	26	9.40
		4	39	9.45
		5	52	9.50
		6	58.5	9.40
		7	65	9.33

Table 12-5
IEEE 802.11n (400ns) Average RF Power

Freq [MHz]	Channel	MCS Index	Data Rate [Mbps]	Measured Average Power [dBm]
2412	1	0	7.2	9.4
		1	14.4	9.3
		2	21.7	9.2
		3	28.9	9.3
		4	43.3	9.25
		5	57.8	9.2
		6	65	9.2
		7	72.2	9.25
2417	2	0	7.2	14.09
		1	14.4	14.15
		2	21.7	14.09
		3	28.9	14.24
		4	43.3	13.27
		5	57.8	12.8
		6	65	12.87
		7	72.2	12.97
2437	6	0	7.2	14.69
		1	14.4	14.34
		2	21.7	14.44
		3	28.9	14.46
		4	43.3	13.48
		5	57.8	13.16
		6	65	13.05
		7	72.2	13.48
2457	10	0	7.2	14.43
		1	14.4	14.42
		2	21.7	14.28
		3	28.9	14.68
		4	43.3	13.36
		5	57.8	13.23
		6	65	13.35
		7	72.2	12.77
2462	11	0	7.2	9.5
		1	14.4	9.61
		2	21.7	9.5
		3	28.9	9.6
		4	43.3	9.52
		5	57.8	9.5
		6	65	9.6
		7	72.2	9.52

Justification for reduced test configurations for WIFI channels per KDB Publication 248227 and April 2010 FCC/TCB Meeting Notes: Highest average RF output power channel for the lowest data rate were selected for SAR evaluation. Other IEEE 802.11 modes (including 802.11g/n) were not investigated since the average output powers were not greater than 0.25 dB than that of the corresponding channel in the lowest data rate IEEE 802.11b mode. The bolded powers in the above tables were tested for SAR.

According to KDB 248227 D01 Page 4, "802.11b/g modes are tested on channels 1,6,11; however, if output power reduction is necessary for channels 1 and/or 11 to meet restricted band requirements the highest output channels closest to each of these channels must be tested instead." Therefore, conducted powers are additionally provided for channels 2 and 10.

Output powers are identical to the original filing for WLAN since this permissive change is to add an external accessory only.

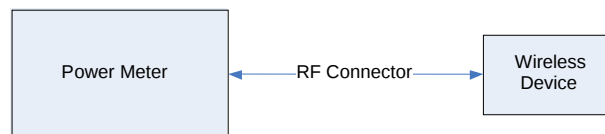


Figure 12-1
Power Measurement Setup

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13 FCC PERSONAL WIRELESS ROUTER CONFIGURATIONS

13.1 Personal Wireless Router Considerations

Some battery-operated handsets have the capability to transmit and receive internet connectivity through simultaneous transmission of WIFI in conjunction with a separate licensed transmitter. The FCC has provided guidance in KDB Publication 941225 D06 for handsets greater than 9 x 5 cm where SAR test considerations are based on a composite test separation distance of 10 mm from the edges, front and back of the device with antennas 2.5 cm or closer to the edge of the device, determined from general mixed use conditions for this type of devices. Since the hotspot SAR results may overlap with the body-worn accessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

13.2 SAR Test Setup for Personal Wireless Router Features

When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of both the WIFI transmitter and another licensed transmitter. Both transmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated for SAR under actual use conditions. Therefore, SAR must be evaluated for each frequency transmission and mode separately and summed with the WIFI transmitter according to KDB 648474 publication procedures. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.

13.3 Power Reduction for Portable Hotspot Mode

This model does not support any power reduction for portable hotspot mode in the permissive changes identified on page 1. .

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13.4 SAR Test Configurations

Table 13-1
Mobile Hotspot Side Exclusions

Mobile Hotspot Sides for SAR Testing						
Mode	Back	Front	Top	Bottom	Right	Left
WCDMA 1900	Yes	Yes	No	Yes	Yes	Yes

Note: This permissive change is to remove hotspot power reduction for WCDMA1900 only. Therefore, only WCDMA1900 was evaluated for SAR.

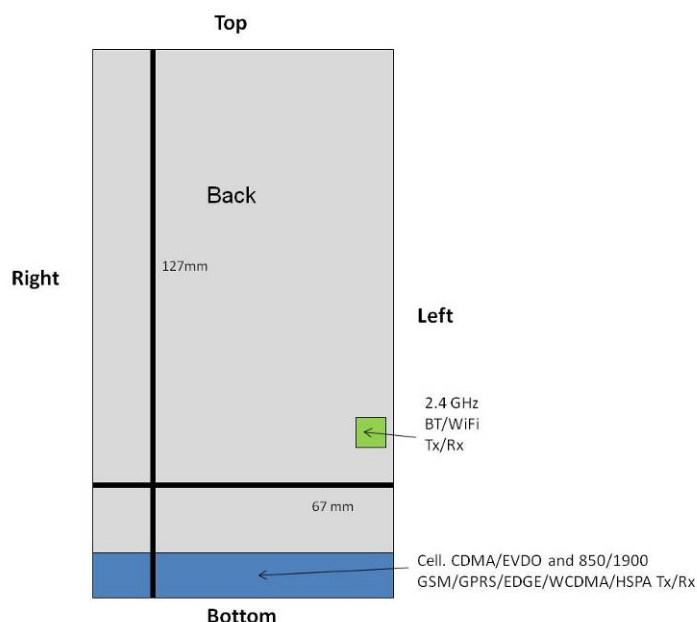


Figure 13-1
Identification of Sides for SAR Testing (Back View)

Particular DUT edges were not necessary to be evaluated for Wireless Router SAR if the edges were greater than 2.5 cm from the transmitting antenna according to FCC KDB Publication 941225 D06 guidance, page 2. The antenna document contains the measured distances of the antennas to the edges of the device.

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14 SYSTEM VERIFICATION

14.1 Tissue Verification

Table 14-1
Measured Tissue Properties for WCDMA1900 SAR Tests

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (C°)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
10/18/2011	1900H	23.2	1850	1.377	41.96	1.400	40.000	-1.64%	4.90%
			1880	1.360	41.45	1.400	40.000	-2.86%	3.63%
			1910	1.447	41.41	1.400	40.000	3.36%	3.52%
10/12/2011	1900B	24.0	1850	1.447	51.41	1.520	53.300	-4.80%	-3.55%
			1880	1.477	51.49	1.520	53.300	-2.83%	-3.40%
			1910	1.506	51.35	1.520	53.300	-0.92%	-3.66%

Table 14-2
Measured Tissue Properties for Lapdock SAR Tests

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (C°)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
09/15/2011	835B	22.9	820	0.967	54.60	0.969	55.284	-0.21%	-1.24%
			835	0.975	54.52	0.970	55.200	0.52%	-1.23%
			850	0.985	54.37	0.988	55.154	-0.30%	-1.42%
10/06/2011	835B	22.0	820	0.961	54.51	0.969	55.284	-0.83%	-1.40%
			835	0.985	54.51	0.970	55.200	1.55%	-1.25%
			850	0.994	54.24	0.988	55.154	0.61%	-1.66%
09/18/2011	1900B	23.0	1850	1.493	52.07	1.520	53.300	-1.78%	-2.31%
			1880	1.508	51.97	1.520	53.300	-0.79%	-2.50%
			1910	1.549	51.83	1.520	53.300	1.91%	-2.76%
10/05/2011	1900B	23.8	1850	1.455	52.11	1.520	53.300	-4.28%	-2.23%
			1880	1.487	52.06	1.520	53.300	-2.17%	-2.33%
			1910	1.523	51.90	1.520	53.300	0.20%	-2.63%
09/19/2011	2450B	23.4	2401	1.867	50.81	1.903	52.765	-1.89%	-3.71%
			2450	1.932	50.67	1.950	52.700	-0.92%	-3.85%
			2499	2.003	50.48	2.019	52.638	-0.79%	-4.10%

Note: KDB Publication 450824 was ensured to be applied for probe calibration frequencies greater than or equal to 50 MHz of the DUT frequencies.

The above measured tissue parameters were used in the DASY software to perform interpolation via the DASY software to determine actual dielectric parameters at the test frequencies (per IEEE 1528 6.6.1.2). The SAR test plots may slightly differ from the table above since the DASY software rounds to three significant digits.

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14.2 Measurement Procedure for Tissue verification

- 1) The network analyzer and probe system was configured and calibrated.
- 2) The probe was immersed in the sample which was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
- 3) The complex admittance with respect to the probe aperture was measured
- 4) The complex relative permittivity , for example from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\epsilon_r\epsilon_0}{[\ln(b/a)]^2} \int_a^b \int_a^b \int_0^\pi \cos\phi' \frac{\exp[-j\omega r(\mu_0\epsilon_r'\epsilon_0)^{1/2}]}{r} d\phi' d\rho' d\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively, $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$, ω is the angular frequency, and $j = \sqrt{-1}$.

14.3 Test System Verification

Prior to assessment, the system is verified to $\pm 10\%$ of the manufacturer SAR measurement on the reference dipole at the time of calibration.

Table 14-3
System Verification Results for WCDMA1900 SAR Tests

System Verification TARGET & MEASURED											
Date:	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Tissue Frequency (MHz)	Dipole SN	Probe SN	Tissue Type	Measured SAR _{1g} (W/kg)	1 W Target SAR _{1g} (W/kg)	1 W Normalized SAR _{1g} (W/kg)	Deviation (%)
10/18/2011	24.1	23.2	0.100	1900	502	3209	Head	4.15	40.200	41.500	3.23%
10/12/2011	23.9	22.1	0.100	1900	502	3209	Body	4.33	41.100	43.300	5.35%

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Table 14-4
System Verification Results for Lapdock SAR Tests

System Verification TARGET & MEASURED											
Date:	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Tissue Frequency (MHz)	Dipole SN	Probe SN	Tissue Type	Measured SAR _{1g} (W/kg)	1 W Target SAR _{1g} (W/kg)	1 W Normalized SAR _{1g} (W/kg)	Deviation (%)
09/15/2011	23.5	21.8	0.100	835	4d047	3258	Body	0.955	9.850	9.550	-3.05%
10/06/2011	22.1	21.8	0.100	835	4d047	3258	Body	0.983	9.850	9.830	-0.20%
09/18/2011	24.2	22.8	0.100	1900	5d080	3209	Body	4.12	40.900	41.200	0.73%
10/05/2011	23.1	22.5	0.100	1900	502	3209	Body	4.33	41.100	43.300	5.35%
09/19/2011	24.7	23.1	0.0158	2450	719	3209	Body	0.872	51.300	55.190	7.58%

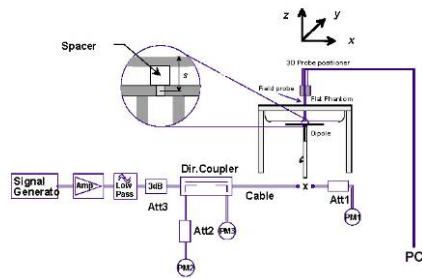


Figure 14-1
System Verification Setup Diagram



Figure 14-2
System Verification Setup Photo

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Table 15-1
WCDMA 1900 Head SAR Results

MEASUREMENT RESULTS							
FREQUENCY		Mode/Band	Conducted Power [dBm]	Power Drift [dB]	Side	Test Position	SAR (1g)
MHz	Ch.						(W/kg)
1880.00	9400	WCDMA 1900	23.59	0.04	Right	Touch	0.099
1880.00	9400	WCDMA 1900	23.59	0.05	Right	Tilt	0.068
1880.00	9400	WCDMA 1900	23.59	0.04	Left	Touch	0.208
1880.00	9400	WCDMA 1900	23.59	0.01	Left	Tilt	0.065
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Head 1.6 W/kg (mW/g) averaged over 1 gram		

Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001].
2. Batteries are fully charged for all readings. Standard battery was used.
3. Tissue parameters and temperatures are listed on the SAR plots.
4. Liquid tissue depth was at least 15.0 cm.
5. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (June 2001) and Public Notice DA-02-1438, if the SAR measured at the middle channel for each test configuration (left, right, cheek/touch, tilt/ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s).
6. WCDMA mode was tested under RMC 12.2 kbps with HSPA Inactive per KDB Publication 941225 D01.
7. To confirm the proper SAR liquid depth, the z-axis plots from the system verifications were included since the system verifications were performed using the same liquid as the SAR tests.
8. The measured SAR when extrapolated to the maximum tune-up power tolerance levels remain compliant for all operating configurations.

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Table 15-2
WCDMA Body-Worn SAR Results

MEASUREMENT RESULTS								
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	Side	SAR (1g)
MHz	Ch.							(W/kg)
1880.00	9400	WCDMA 1900	RMC	23.59	-0.03	2.5 cm	back	0.151
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram		

Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001].
2. Tissue parameters and temperatures are listed on the SAR plots.
3. Batteries are fully charged for all readings. Standard battery was used.
4. Liquid tissue depth was at least 15.0 cm.
5. Device was tested using a fixed spacing for body-worn testing. A separation distance of 25 mm was tested because the manufacturer has determined that there will be body-worn accessories available in the marketplace for users to support this separation distance.
6. WCDMA mode in Body SAR was tested under RMC 12.2 kbps with HSPA Inactive per KDB Publication 941225 D01. HSPA SAR was not required since the average output power of the HSPA subtests was not more than 0.25 dB higher than the RMC level and SAR was less than 1.2 W/kg.
7. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (June 2001) and Public Notice DA-02-1438, 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 for such test configuration(s).
8. To confirm the proper SAR liquid depth, the z-axis plots from the system verifications were included since the system verifications were performed using the same liquid as the SAR tests.
9. The measured SAR when extrapolated to the maximum tune-up power tolerance levels remain compliant for all operating configurations.

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Table 15-3
WCDMA Hotspot SAR Results

MEASUREMENT RESULTS								
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	Side	SAR (1g)
MHz	Ch.							(W/kg)
1852.40	9262	WCDMA 1900	RMC	23.50	0.01	1.0 cm	back	0.651
1880.00	9400	WCDMA 1900	RMC	23.59	-0.06	1.0 cm	back	0.911
1907.60	9538	WCDMA 1900	RMC	23.67	-0.02	1.0 cm	back	0.904
1880.00	9400	WCDMA 1900	RMC	23.59	0.02	1.0 cm	front	0.526
1852.40	9262	WCDMA 1900	RMC	23.50	0.01	1.0 cm	bottom	0.965
1880.00	9400	WCDMA 1900	RMC	23.59	0.05	1.0 cm	bottom	1.300
1880.00	9400	WCDMA 1900	HSPA	23.22	0.04	1.0 cm	bottom	1.090
1907.60	9538	WCDMA 1900	RMC	23.67	0.05	1.0 cm	bottom	1.290
1880.00	9400	WCDMA 1900	RMC	23.59	0.02	1.0 cm	right	0.032
1880.00	9400	WCDMA 1900	RMC	23.59	-0.04	1.0 cm	left	0.091
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram		

Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001]
2. Tissue parameters and temperatures are listed on the SAR plots.
3. Batteries are fully charged for all readings. Standard battery was used.
4. Liquid tissue depth was at least 15.0 cm.
5. Device was tested using a fixed spacing.
6. Body SAR performed on the bottom edge was performed for HSPA with E-DCH Sub-test 5, using H-Set 1 and QPSK for FRC and a 12.2 kbps RMC configured in Test Loop Mode 1 with power control algorithm 2 per KDB 941225 D01 since the SAR in the 12.2 kbps RMC configuration for bottom edge was more than 75% of the SAR limit.
7. Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (June 2001) and Public Notice DA-02-1438, 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 for such test configuration(s).
8. Top Edge was not tested since the antenna distance from the edge was greater than 2.5 cm per FCC KDB Publication 941225 D06 guidance (see Section 13.4).
9. During SAR Testing for the Wireless Router conditions per KDB 941225 D06, the actual Portable Hotspot operation (with actual simultaneous transmission with WIFI) was not activated (See Section 13.2).
10. To confirm the proper SAR liquid depth, the z-axis plots from the system verifications were included since the system verifications were performed using the same liquid as the SAR tests.
11. The measured SAR when extrapolated to the maximum tune-up power tolerance levels remain compliant for all operating configurations.

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Table 16-1
GSM/WCDMA/CDMA Body SAR Results

MEASUREMENT RESULTS										
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	Serial Number	# of GPRS/GSM Slots	Position	SAR (1g)
MHz	Ch.									(W/kg)
836.60	190	GSM 850	GPRS	31.64	-0.02	0.0 cm	TA19301C5G	2	Lap	0.617
836.60	190	GSM 850	GSM	32.99	-0.10	0.0 cm	TA19301C5G	1	Lap	0.407
836.60	4183	WCDMA 850	RMC	23.87	0.01	0.0 cm	TA19301C3G	N/A	Lap	0.518
836.52	384	Cell. CDMA	EVDO	25.12	0.02	0.0 cm	LSNW230069	N/A	Lap	0.743
836.52	384	Cell. CDMA	SO55	25.19	0.00	0.0 cm	LSNW230069	N/A	Lap	0.749
1880.00	661	GSM 1900	GPRS	28.32	0.02	0.0 cm	TA19301C3G	2	Lap	0.092
1880.00	661	GSM 1900	GSM	30.75	0.08	0.0 cm	TA19301C3G	1	Lap	0.100
1880.00	9400	WCDMA 1900	RMC	24.07	0.00	0.0 cm	TA19301C3G	N/A	Lap	0.118
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram				

Notes:

- The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001].
- The lapdock was placed below a SAM phantom with the base of the laptop in contact with the flat portion of the phantom and the screen opened 90 degrees. A cable connects the lapdock to the phone and the phone is positioned in a slot behind the screen. There is only one orientation for the phone with respect to the lapdock. The SAR test setup photographs show device positioning and setup.
 - Batteries are fully charged for all readings. Standard battery was used.
 - Tissue parameters and temperatures are listed on the SAR plots.
 - Liquid tissue depth was at least 15.0 cm.
- Justification for reduced test configurations: Per FCC/OET Bulletin 65 Supplement C (June 2001) and Public Notice DA-02-1438, 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 for such test configuration(s).
- CDMA Body SAR was tested under EVDO Rev. 0 per FCC 3G Guidance (See Section 11.2.3) per FCC KDB Publication 941225 D01. Rev. A and TDSO32 RC3 tests were not required since the maximum average output of each channel in Rev. A and RC3 (1x RTT) was not more than ¼ dB higher than that measured Rev 0.
- WCDMA mode in Body SAR was tested under RMC 12.2 kbps with HSPA Inactive per KDB Publication 941225 D01. HSPA SAR was not required since the average output power of the HSPA subtests was not more than 0.25 dB higher than the RMC level and SAR was less than 1.2 W/kg.
- Justification for reduced test configurations per KDB Publication 941225 D03: The source-based time-averaged output power was evaluated for all multi-slot operations. In addition to the worst-case reported, all source-based time-averaged powers within 10% of the worst-case were additionally included in the evaluation.
- CDMA Body SAR with RC3/SO55 and GSM Voice Body SAR were additionally tested to cover the simultaneous transmission scenario of voice calls with WLAN data.
- To confirm the proper SAR liquid depth, the z-axis plots are included from the system verifications which use the same liquid as the SAR tests.

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Table 16-2
WLAN Body SAR Results

MEASUREMENT RESULTS										
FREQUENCY		Mode	Service	Conducted Power [dBm]	Power Drift [dB]	Spacing	Serial Number	Data Rate (Mbps)	Position	SAR (1g)
MHz	Ch.									(W/kg)
2437	6	IEEE 802.11b	DSSS	17.84	0.00	0.0 cm	TA19301C3G	1	Lap	0.030
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Body 1.6 W/kg (mW/g) averaged over 1 gram				

Notes:

1. The test data reported are the worst-case SAR value with the position set in a typical configuration. Test procedures used were according to FCC/OET Bulletin 65, Supplement C [June 2001].
2. The lapdock was placed below a SAM phantom with the base of the laptop in contact with the flat portion of the phantom and the screen opened 90 degrees. A cable connects the lapdock to the phone and the phone is positioned in a slot behind the screen. There is only one orientation for the phone with respect to the lapdock. The SAR test setup photographs show device positioning and setup.
3. Batteries are fully charged for all readings. Standard battery was used.
4. Tissue parameters and temperatures are listed on the SAR plots.
5. Liquid tissue depth was at least 15.0 cm.
6. Justification for reduced test configurations for WIFI channels per KDB Publication 248227 and April 2010 FCC/TCB Meeting Notes: Highest average RF output power channel for the lowest data rate were selected for SAR evaluation. Other IEEE 802.11 modes (including 802.11g/n) were not investigated since the average output powers were not greater than 0.25 dB than that of the corresponding channel in the lowest data rate IEEE 802.11b mode.
7. WLAN transmission was verified with a spectrum analyzer.
8. To confirm the proper SAR liquid depth, the z-axis plots are included from the system verification which uses the same liquid as the SAR tests.

FCC ID: IHDP56MD2	 PCTEST ENGINEERING LABORATORY, INC.	SAR COMPLIANCE REPORT	 MOTOROLA	Reviewed by: Quality Manager
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17 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

17.1 Introduction

The following procedures adopted from “FCC SAR Considerations for Cell Phones with Multiple Transmitters” FCC KDB Publication 648474 are applicable to handsets with built-in unlicensed transmitters such as 802.11a/b/g/n and Bluetooth devices which may simultaneously transmit with the licensed transmitter.

17.2 FCC Power Tables & Conditions

	2.45	5.15 - 5.35	5.47 - 5.85	GHz
P_{Ref}	12	6	5	mW
Device output power should be rounded to the nearest mW to compare with values specified in this table.				

Figure 17-1
Output Power Thresholds for Unlicensed Transmitters

	Individual Transmitter	Simultaneous Transmission
Licensed Transmitters	<u>Routine evaluation required</u>	SAR not required: <u>Unlicensed only</u> - when stand-alone 1-g SAR is not required and antenna is ≥ 5 cm from other antennas Licensed & Unlicensed - when the sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas - when SAR to peak location separation ratio of simultaneous transmitting antenna pair is < 0.3
Unlicensed Transmitters	When there is no simultaneous transmission – - output ≤ 60/f: SAR not required - output > 60/f: stand-alone SAR required When there is simultaneous transmission – <u>Stand-alone SAR not required when</u> - output $\leq 2 \cdot P_{Ref}$ and antenna is ≥ 5.0 cm from other antennas - output $\leq P_{Ref}$ and antenna is ≥ 2.5 cm from other antennas - output $\leq P_{Ref}$ and antenna is < 2.5 cm from other antennas, each with either output power $\leq P_{Ref}$ or 1-g SAR < 1.2 W/kg <u>Otherwise stand-alone SAR is required</u> When stand-alone SAR is required - test SAR on highest output channel for each wireless mode and exposure condition - if SAR for highest output channel is $> 50\%$ of SAR limit, evaluate all channels according to normal procedures	SAR required: <u>Licensed & Unlicensed</u> antenna pairs with SAR to peak location separation ratio ≥ 0.3; test is only required for the configuration that results in the highest SAR in stand-alone configuration for each wireless mode and exposure condition Note: simultaneous transmission exposure conditions for head and body can be different for different style phones; therefore, different test requirements may apply

Figure 17-2
SAR Evaluation Requirements for Multiple Transmitter Handsets

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17.3 Multiple Antenna/Transmission Information

The separation distance between the main antenna and the Bluetooth/WLAN antenna is 28.9 mm.

Peak RF Conducted Powers:

- Bluetooth Tx = 16.943 mW.
- WLAN 802.11b mode = 99.08 mW.
- WLAN 802.11g mode = 225.94 mW.
- WLAN 802.11n mode = 168.27 mW.

Maximum average RF Conducted Power s:

- Bluetooth Tx = 9.05 dBm.
- WLAN 802.11b mode = 60.81 mW.
- WLAN 802.11g mode = 46.56 mW.
- WLAN 802.11n mode = 29.65 mW.

17.4 Bluetooth/WLAN SAR Considerations

Per April 2011 FCC/TCB Workshop Guidance, p.20, Bluetooth SAR was not required since

1. Bluetooth and 2.4GHz Wi-Fi are implemented in the same chipset, using the same antenna and RF components
2. Bluetooth time-averaged power is < 60/2.4 mW (or 25 mW)
3. The maximum peak and average Bluetooth power is less than the respective peak and average output powers in all Wi-Fi modes.
4. The measured Wi-Fi SAR is < 0.4 W/kg for all applicable Bluetooth configurations (Body-Worn).
5. Simultaneous transmission SAR exclusion applies to all applicable configurations involving Wi-Fi or Bluetooth.

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18 MULTIPLE TRANSMITTER SAR EVALUATION

These following sections include multiple transmitter SAR calculations and measurement in accordance with KDB 648474 publication FCC guidance.

18.1 Simultaneous Transmission Scenarios for WCDMA 1900

WCDMA/HSPA hotspot may be active during voice WCDMA mode because, in WCDMA, both voice and data use the same physical channel. When doing multiple services (multi-Radio Access Bearer or multi-RAB), the power control will be based on a physical control channel (dedicated Physical Control Channel [DPCCH]) and power control will be adjusted to meet the needs of both services. Therefore, the WCDMA+WLAN sum also represents the WCDMA Voice + WCDMA/HSPA + WLAN scenario.

Table 18-1
Simultaneous Transmission Scenario (Held to Ear)

Simult Tx	Configuration	WCDMA 1900 SAR (W/kg)	2.4 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
Head SAR	Right Cheek	0.099	0.115	0.214
	Right Tilt	0.068	0.046	0.114
	Left Cheek	0.208	0.258	0.466
	Left Tilt	0.065	0.029	0.094

Note: WIFI data from the original filing was used since there was no change in the WIFI operation of the device.

The above table represents the theoretical numerical SAR sum for the simultaneous transmission scenario representing a held to ear call with 2.4 GHz WLAN

Table 18-2
Simultaneous Transmission Scenario (Body-Worn at 2.5 cm)

Configuration	WCDMA SAR (W/kg)	2.4 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
Back Side	0.151	<0.266	<0.417

Note: WIFI data from the original filing was used since there was no change in the WIFI operation of the device.

The above table represents the theoretical numerical SAR sum for the simultaneous transmission scenario representing a voice call being used with a body-worn accessory spacing the handset 2.5 cm in conjunction with 2.4 GHz WLAN. For SAR calculations at 2.5 cm, WLAN SAR values for 1.0 cm were used since the 1.0 cm test distance for WLAN was more conservative. "<" denotes the 1.0 cm WLAN SAR values used for summation purposes.

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Table 18-3
Simultaneous Transmission Scenario (Hotspot)

Simult Tx	Configuration	WCDMA 1900 SAR (W/kg)	2.4 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
Body SAR	Back	0.911	0.266	1.177
	Front	0.526	0.124	0.650
	Top	-	-	0.000
	Bottom	1.300	-	1.300
	Right	0.032	-	0.032
	Left	0.091	0.402	0.493

Note: WIFI data from the original filing was used since there was no change in the WIFI operation of the device.

Note: Per FCC KDB Publication 941225 D06, the edges with antennas more than 2.5 cm are not required to be evaluated for SAR (""). The above table represents the theoretical numerical SAR sum for the simultaneous transmission scenario representing the Wireless Router mode consisting of simultaneous transmission with WCDMA1900 and WIFI

18.2 Lapdock Simultaneous Transmission Analysis

When in the lapdock configuration, this device supports simultaneous transmission scenarios, including CDMA/EVDO and WCDMA Hotspot and CDMA/GSM/WCDMA Voice + WIFI Data.

Table 18-4
Simultaneous Transmission Scenario (Voice Calls with WLAN Data at 0.0 cm)

Configuration	Mode	2G/3G SAR (W/kg)	2.4 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
Lap	GSM 850	0.407	0.030	0.437
Lap	WCDMA 850	0.518	0.030	0.548
Lap	Cell. CDMA	0.749	0.030	0.779
Lap	GSM 1900	0.100	0.030	0.130
Lap	WCDMA 1900	0.118	0.030	0.148

The above table represents scenarios with a voice call with WLAN Data while using the lapdock.

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Table 18-5
Simultaneous Transmission Scenario (Portable Hotspot at 0.0 cm)

Configuration	Mode	2G/3G SAR (W/kg)	2.4 GHz WIFI SAR (W/kg)	Σ SAR (W/kg)
Lap	WCDMA 850	0.518	0.030	0.548
Lap	Cell. EVDO	0.743	0.030	0.773
Lap	WCDMA 1900	0.118	0.030	0.148

The above table represents portable hotspot conditions using the lapdock. GPRS hotspot is not supported with this device.

18.3 Simultaneous Transmission Conclusion

The above numerical summed SAR was below the SAR limit. Therefore, the above analysis is sufficient to determine that simultaneous transmission cases will not exceed the SAR limit. No volumetric SAR summation per FCC KDB Publication 648474.

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19 EQUIPMENT LIST

Applicable for 09/15/11-10/12/11

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8648D	(9kHz-4GHz) Signal Generator	10/13/2010	Annual	10/13/2011	3613A00315
Agilent	8753E	(30kHz-6GHz) Network Analyzer	4/21/2011	Annual	4/21/2012	JP38020182
Agilent	E5515C	Wireless Communications Test Set	10/11/2010	Annual	10/11/2011	GB46110872
Agilent	E5515C	Wireless Communications Test Set	10/8/2010	Annual	10/8/2011	GB46310798
Agilent	E5515C	Wireless Communications Test Set	7/6/2011	Annual	7/6/2012	GB41450275
Agilent	E8257D	(250kHz-20GHz) Signal Generator	4/8/2011	Annual	4/8/2012	MY45470194
Gigatronics	80701A	(0.05-18GHz) Power Sensor	10/11/2010	Annual	10/11/2011	1833460
Gigatronics	8651A	Universal Power Meter	10/11/2010	Annual	10/11/2011	8650319
Index SAR	IXTL-010	Dielectric Measurement Kit	N/A		N/A	N/A
Index SAR	IXTL-030	30MM TEM line for 6 GHz	N/A		N/A	N/A
Pasternack	PE2208-6	Bidirectional Coupler	N/A		N/A	N/A
Pasternack	PE2209-10	Bidirectional Coupler	N/A		N/A	N/A
Rohde & Schwarz	CMU200	Base Station Simulator	11/11/2010	Annual	11/11/2011	836371/0079
Rohde & Schwarz	CMU200	Base Station Simulator	6/1/2011	Annual	6/1/2012	833855/0010
Rohde & Schwarz	CMU200	Base Station Simulator	4/19/2011	Annual	4/19/2012	107826
Rohde & Schwarz	NRVD	Dual Channel Power Meter	4/8/2011	Biennial	4/8/2013	101695
SPEAG	D1900V2	1900 MHz SAR Dipole	7/22/2011	Annual	7/22/2012	5d080
SPEAG	D2450V2	2450 MHz SAR Dipole	8/19/2011	Annual	8/19/2012	719
SPEAG	D835V2	835 MHz SAR Dipole	2/9/2011	Annual	2/9/2012	4d047
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/21/2011	Annual	2/21/2012	649
SPEAG	DAE4	Dasy Data Acquisition Electronics	5/19/2011	Annual	5/19/2012	859
SPEAG	ES3DV3	SAR Probe	4/18/2011	Annual	4/18/2012	3209
Rohde & Schwarz	SMIQ03B	Signal Generator	4/6/2011	Annual	4/6/2012	DE27259
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5318
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5442
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	1190013
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	98150041
Agilent	8648D	Signal Generator	4/5/2011	Annual	4/5/2012	3629U00687
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	1070030
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5821
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	8013
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5605
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	2400
Agilent	E5515C	Wireless Communications Test Set	7/6/2011	Annual	7/6/2012	GB43304447
Agilent	E5515C	Wireless Communications Tester	4/21/2011	Annual	4/21/2012	US41140256
Amplifier Research	551G4	5W, 800MHz-4.2GHz	N/A		N/A	21910
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	N/A		N/A	N/A
Agilent	E5515C	Wireless Communications Test Set	2/8/2011	Annual	2/8/2012	GB45360985
SPEAG	D3700V2	3700 MHz SAR Dipole	2/16/2011	Annual	2/16/2012	1002
Rohde & Schwarz	CMW500	LTE Radio Communication Tester	3/11/2011	Annual	3/11/2012	103962
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331322
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331323
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331330
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331332
Control Company	61220-416	Long-Stem Thermometer	3/16/2011	Biennial	3/16/2013	111391601
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286445
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286460
VWR	36934-158	Wall-Mounted Thermometer	5/26/2010	Biennial	5/26/2012	101718589
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286454
VWR	36934-158	Wall-Mounted Thermometer	2/26/2010	Biennial	2/26/2012	101536273
SPEAG	ES3DV3	SAR Probe	4/8/2011	Annual	4/8/2012	3258
SPEAG	D1750V2	1750 MHz SAR Dipole	5/24/2011	Annual	5/24/2012	1051
MiniCircuits	SLP-2400+	Low Pass Filter	N/A		N/A	R8979500903
Narda	4772-3	Attenuator (3dB)	N/A		N/A	9406
Narda	BW-S3W2	Attenuator (3dB)	N/A		N/A	120
Rohde & Schwarz	CMW500	LTE Radio Communication Tester	8/5/2011	Annual	8/5/2012	112347
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	N/A		N/A	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	N/A		N/A	N/A

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Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8648D	(9kHz-4GHz) Signal Generator	10/10/2011	Annual	10/10/2012	3613A00315
Agilent	8753E	(30kHz-6GHz) Network Analyzer	4/21/2011	Annual	4/21/2012	JP38020182
Agilent	E5515C	Wireless Communications Test Set	10/10/2011	Annual	10/10/2012	GB46110872
Agilent	E5515C	Wireless Communications Test Set	7/6/2011	Annual	7/6/2012	GB41450275
Agilent	E8257D	(250kHz-20GHz) Signal Generator	4/8/2011	Annual	4/8/2012	MY45470194
Gigatronics	80701A	(0.05-18GHz) Power Sensor	10/12/2011	Annual	10/12/2012	1833460
Gigatronics	8651A	Universal Power Meter	10/12/2011	Annual	10/12/2012	8650319
Rohde & Schwarz	CMU200	Base Station Simulator	11/11/2010	Annual	11/11/2011	836371/0079
Rohde & Schwarz	CMU200	Base Station Simulator	6/1/2011	Annual	6/1/2012	833855/0010
Rohde & Schwarz	CMU200	Base Station Simulator	4/19/2011	Annual	4/19/2012	107826
Rohde & Schwarz	NRVD	Dual Channel Power Meter	4/8/2011	Biennial	4/8/2013	101695
SPEAG	D1900V2	1900 MHz SAR Dipole	2/17/2011	Annual	2/17/2012	502
SPEAG	DAE4	Dasy Data Acquisition Electronics	5/19/2011	Annual	5/19/2012	859
SPEAG	ES3DV3	SAR Probe	4/18/2011	Annual	4/18/2012	3209
Rohde & Schwarz	SMIQ03B	Signal Generator	4/6/2011	Annual	4/6/2012	DE27259
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5318
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5442
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	1190013
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	98150041
Agilent	8648D	Signal Generator	4/5/2011	Annual	4/5/2012	3629U00687
Anritsu	ML2438A	Power Meter	2/7/2011	Annual	2/7/2012	1070030
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5821
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	8013
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	5605
Anritsu	MA2481A	Power Sensor	2/7/2011	Annual	2/7/2012	2400
Agilent	E5515C	Wireless Communications Test Set	7/6/2011	Annual	7/6/2012	GB43304447
Agilent	E5515C	Wireless Communications Tester	4/21/2011	Annual	4/21/2012	US41140256
Agilent	E5515C	Wireless Communications Test Set	2/8/2011	Annual	2/8/2012	GB45360985
Rohde & Schwarz	CMW500	LTE Radio Communication Tester	3/11/2011	Annual	3/11/2012	103962
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331322
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331323
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331330
Control Company	61220-416	Long-Stem Thermometer	2/15/2011	Biennial	2/15/2013	111331332
Control Company	61220-416	Long-Stem Thermometer	3/16/2011	Biennial	3/16/2013	111391601
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286445
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286460
VWR	36934-158	Wall-Mounted Thermometer	5/26/2010	Biennial	5/26/2012	101718589
VWR	36934-158	Wall-Mounted Thermometer	1/21/2011	Biennial	1/21/2013	111286454
VWR	36934-158	Wall-Mounted Thermometer	2/26/2010	Biennial	2/26/2012	101536273
Rohde & Schwarz	CMW500	LTE Radio Communication Tester	8/5/2011	Annual	8/5/2012	112347
MiniCircuits	SLP-2400+	Low Pass Filter	N/A		N/A	R8979500903
Narda	4772-3	Attenuator (3dB)	N/A		N/A	9406
Narda	BW-S3W2	Attenuator (3dB)	N/A		N/A	120
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	N/A		N/A	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	N/A		N/A	N/A

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20 MEASUREMENT UNCERTAINTIES

Applicable for 750 – 3000 MHz.

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E.2.1	6.0	N	1	1.0	1.0	6.0	6.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	1.0	1.0	1.3	1.3	∞
Boundary Effect	E.2.3	0.4	N	1	1.0	1.0	0.4	0.4	∞
Linearity	E.2.4	0.3	N	1	1.0	1.0	0.3	0.3	∞
System Detection Limits	E.2.5	5.1	N	1	1.0	1.0	5.1	5.1	∞
Readout Electronics	E.2.6	1.0	N	1	1.0	1.0	1.0	1.0	∞
Response Time	E.2.7	0.8	R	1.73	1.0	1.0	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1.0	1.0	1.5	1.5	∞
RF Ambient Conditions	E.6.1	3.0	R	1.73	1.0	1.0	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.4	R	1.73	1.0	1.0	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E.6.3	2.9	R	1.73	1.0	1.0	1.7	1.7	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	1.0	R	1.73	1.0	1.0	0.6	0.6	∞
Test Sample Related									
Test Sample Positioning	E.4.2	6.0	N	1	1.0	1.0	6.0	6.0	287
Device Holder Uncertainty	E.4.1	3.32	R	1.73	1.0	1.0	1.9	1.9	∞
Output Power Variation - SAR drift measurement	6.6.2	5.0	R	1.73	1.0	1.0	2.9	2.9	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	4.0	R	1.73	1.0	1.0	2.3	2.3	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Conductivity - measurement uncertainty	E.3.3	3.8	N	1	0.64	0.43	2.4	1.6	6
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Liquid Permittivity - measurement uncertainty	E.3.3	4.5	N	1	0.60	0.49	2.7	2.2	6
Combined Standard Uncertainty (k=1)							RSS	12.1	11.7
Expanded Uncertainty (95% CONFIDENCE LEVEL)							k=2	24.2	23.5
									299

The above measurement uncertainties are according to IEEE Std. 1528-2003

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21 CONCLUSION

21.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Industry Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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