ITS Intertek Testing Services
ETL SEMKO

Specific Absorption Rate (SAR) Test Report

for

Cardionet, Inc.

on the

CardioNet ECG Monitor With Arrhythmia Detection
Model Number: 1001

Test Report: 30225951
Date of Report: March 28, 2002

Job #: 3022595
Date of Test: March 28, 2002

Total No of Pages Contained in this Report: 46.

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

Review Date: 3/29/02

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Cardionet, Inc., Model No: 1001 Date of Test: March 28, 2002
FCC ID: Not Labeled

1.0 JOB DESCRIPTION

1.1 Client Information

The 1001 has been tested at the request of:

Company: Cardionet, Inc.
510 Market Street
San Diego , CA 92101
USA

Name of contact: Mr. Gary Thomas
Telephone: 619/243-7530
Fax: 619/243-7700

1.2 Equipment under test (EUT)

Product Descriptions:

Equipment	CardioNet ECG Monitor With Arrhythmia Detection		
Trade Name	CardioNet	P/N.	1001
FCC ID	Not Labeled	S/N No.	11006
Category	Portable device	RF Exposure	Uncontrolled Environment
Frequency Band	824 - 849 MHz	System	CDPD

EUT Antenna Description			
Type	Monopole	Configuration	Fixed
Dimensions	13.5mm (L), 7mm (D)	Gain	0 dBi
Location	N/A		

Use of Product : The Sensor communicates the ECG Arrhythmic information wirelessly to the Monitor which the events are then sent out over a wireless CDPD Network

Manufacturer: Cardionet, Inc.

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

EUT receive date: March 28, 2002

EUT received condition: Good working condition prototype

Test start date: March 28, 2002

Test end date: March 28, 2002

1.3 Test Plan Reference

FCC Rule: Part 2.1093, FCC's OET Bulletin 65, Supplement C (Edition 01-01)

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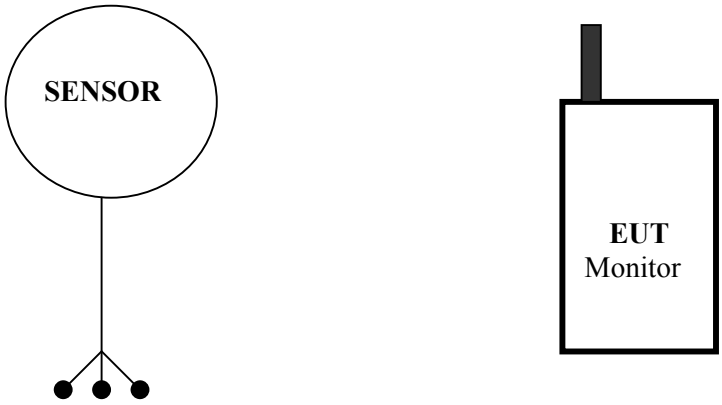
1.4 System Test Configuration

1.4.1 System Block Diagram & Support Equipment

The diagram shown below details test configuration of the equipment under test.



The CardioNet Monitoring System consists of two devices the Cardio Sensor and the Cardio Monitor. The Cardio Sensor is a very low power transmitter operating at ISM band (902 - 928 MHz) at 1 mW, Communicates with the Cardio Monitor. The Cardio Monitor in addition to communicating with the sensor, transmits data to basestation at cellular band frequencies (824 – 848 MHz).

No Support Equipment was used. The test sample was operated in a test mode that allows control of the transmitter without the need to place actual phone calls. For the purposes of this test the device is commanded to test mode and manually set to the proper channel, transmitter power level and transmit mode of operation. The device was then placed in the SAR Measurement System with a fully charged battery.

1.4.2 Test Position

Three test configurations were used to show compliance with the FCC RF human exposure requirements. In all configurations, the 1001 was configured for testing in a typical fashion (as a customer would normally use it). Due to the application and usage of the product, SAR measurements with the human head region are not necessary. Table 1 below describes the setup and condition:

Table 1, Equipment Setup	
Configuration	**Description**
A	• Antenna in horizontal position, distance from antenna to Phantom = 16.5 mm Simulating close proximity of human body; Back Side touching phantom
B	• Antenna in horizontal position, distance from antenna to Phantom = 13.5 mm Simulating close proximity of human body; Front Side touching phantom

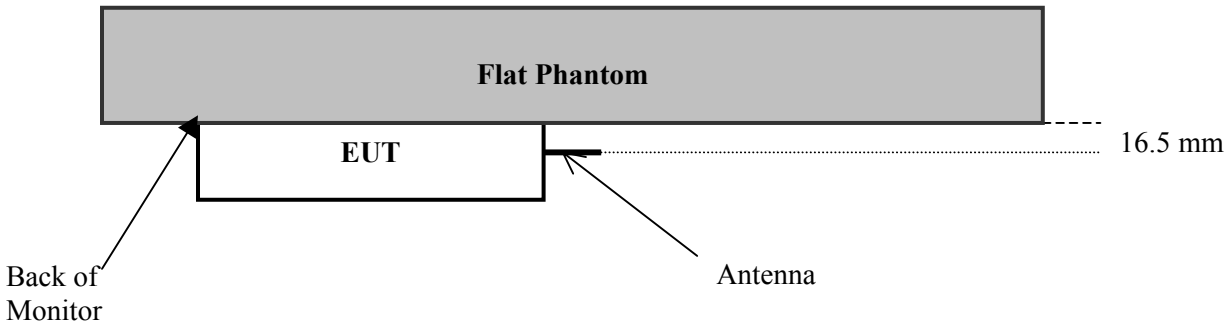


Figure 1: Configuration A Back Side Touching Phantom

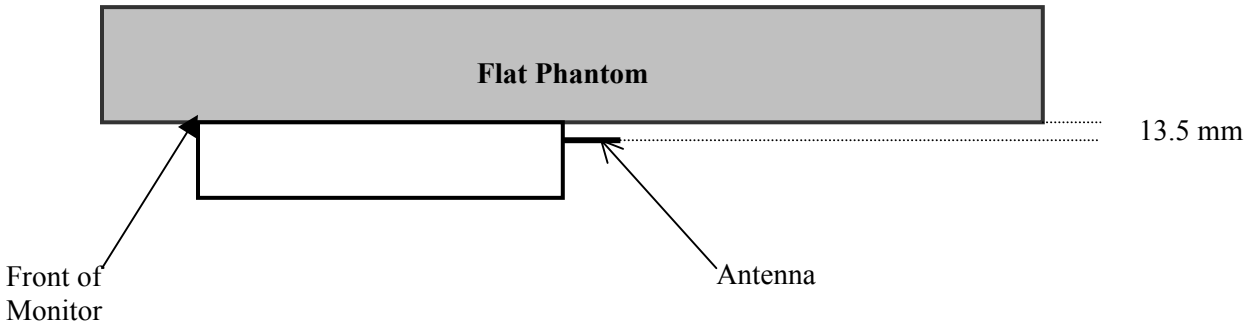


Figure 2: Configuration B Front Side Touching Phantom

1.4.3 Test Condition

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

EUT Antenna	Fixed length	Orientation	N/A
Usage	Stand-alone	Distance between antenna axis at the joint and the phantom surface:	16.5 mm – Back Side touching phantom 13.5 mm –Front Side touching phantom
Simulating human Body/hand	body	EUT Battery	Unit powered from battery.
Power output	**Frequency MHz**	**Power Output, Watts**	**Power Output, dBm**
	824	0.381	25.8
	835	0.325	25.1
	848	0.227	23.5

The spatial peak SAR values were accessed for lowest, middle and highest operating channels defined by the manufacturer.

Antenna port power measurement was performed, with the HP 435A power meter, before and after the SAR tests to ensure that the 1001 operated at the highest power level.

1.5 Modifications required for compliance

No modifications were implemented by Intertek Testing Services.

1.6 Additions, deviations and exclusions from standards

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

2.0 SAR EVALUATION

2.1 SAR Limits

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

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

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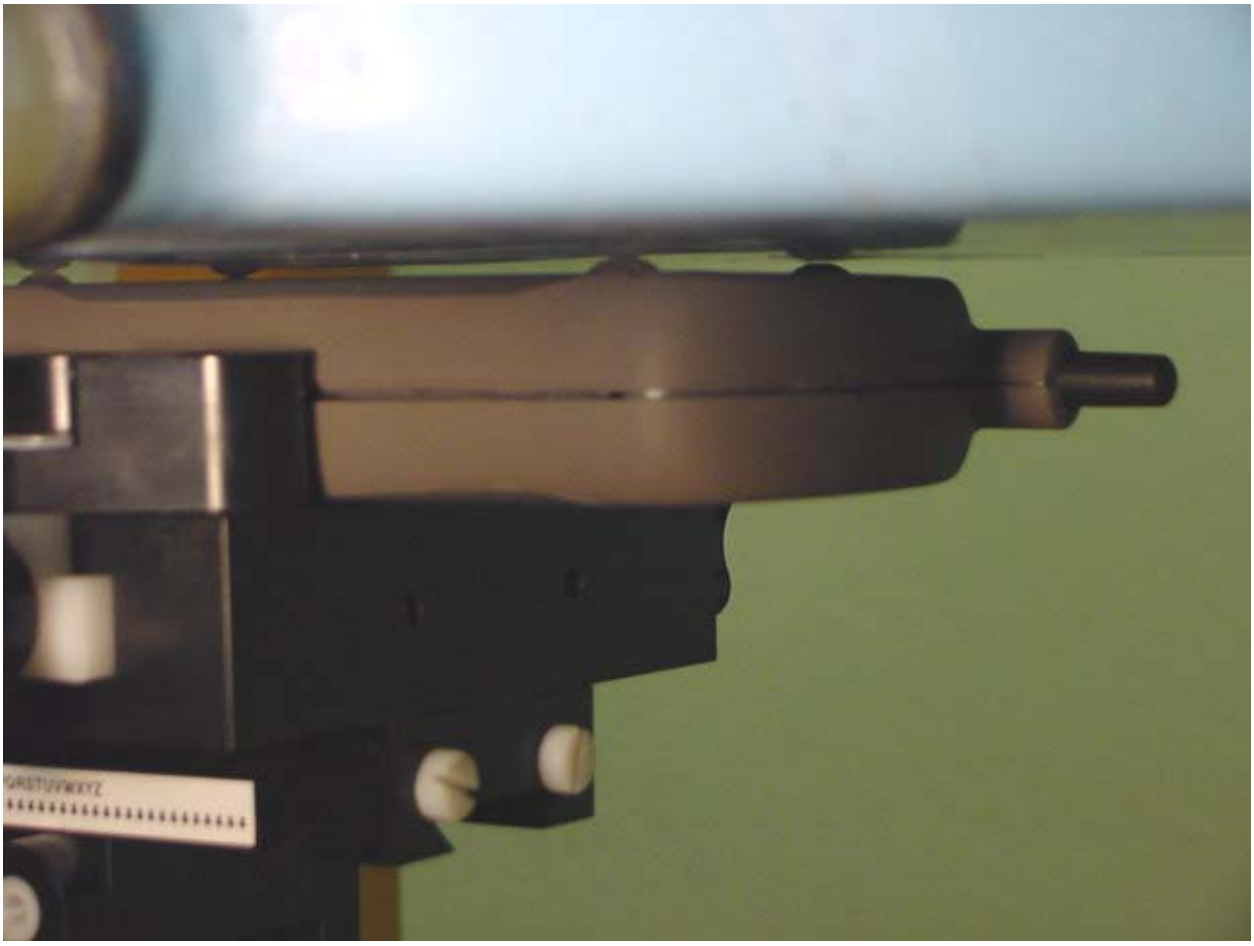
2.2 Configuration Photographs

SAR measurement Test Setup

(Configuration A)

(Back Side Touching Phantom)

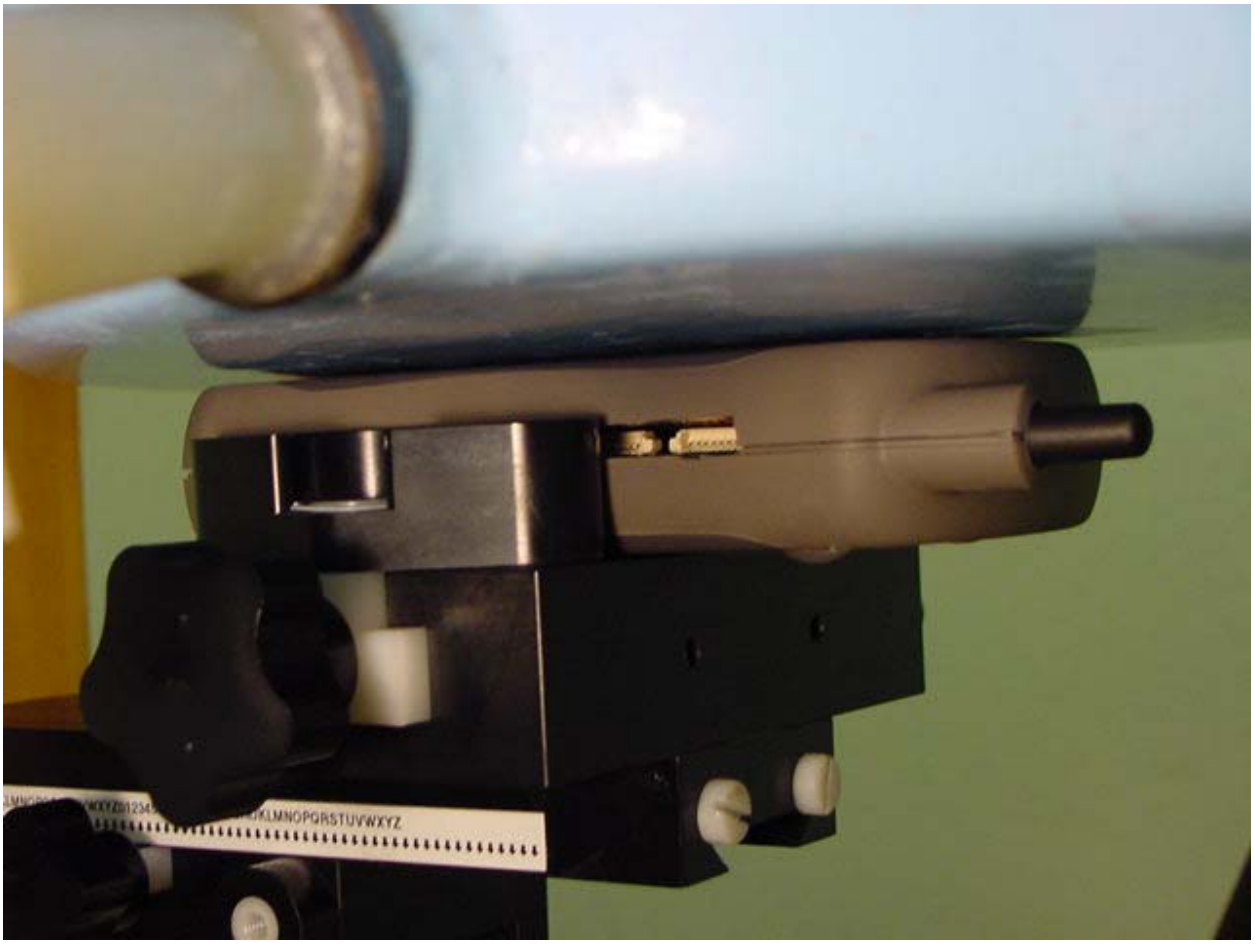


2.2 Configuration Photographs (Continued)

SAR measurement Test Setup

(Configuration B)

Front Side Touching Phantom



2.2 Configuration Photographs (Continued)

SAR measurement Test Setup

EUT Cardio Monitor

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2.2 Configuration Photographs (Continued)

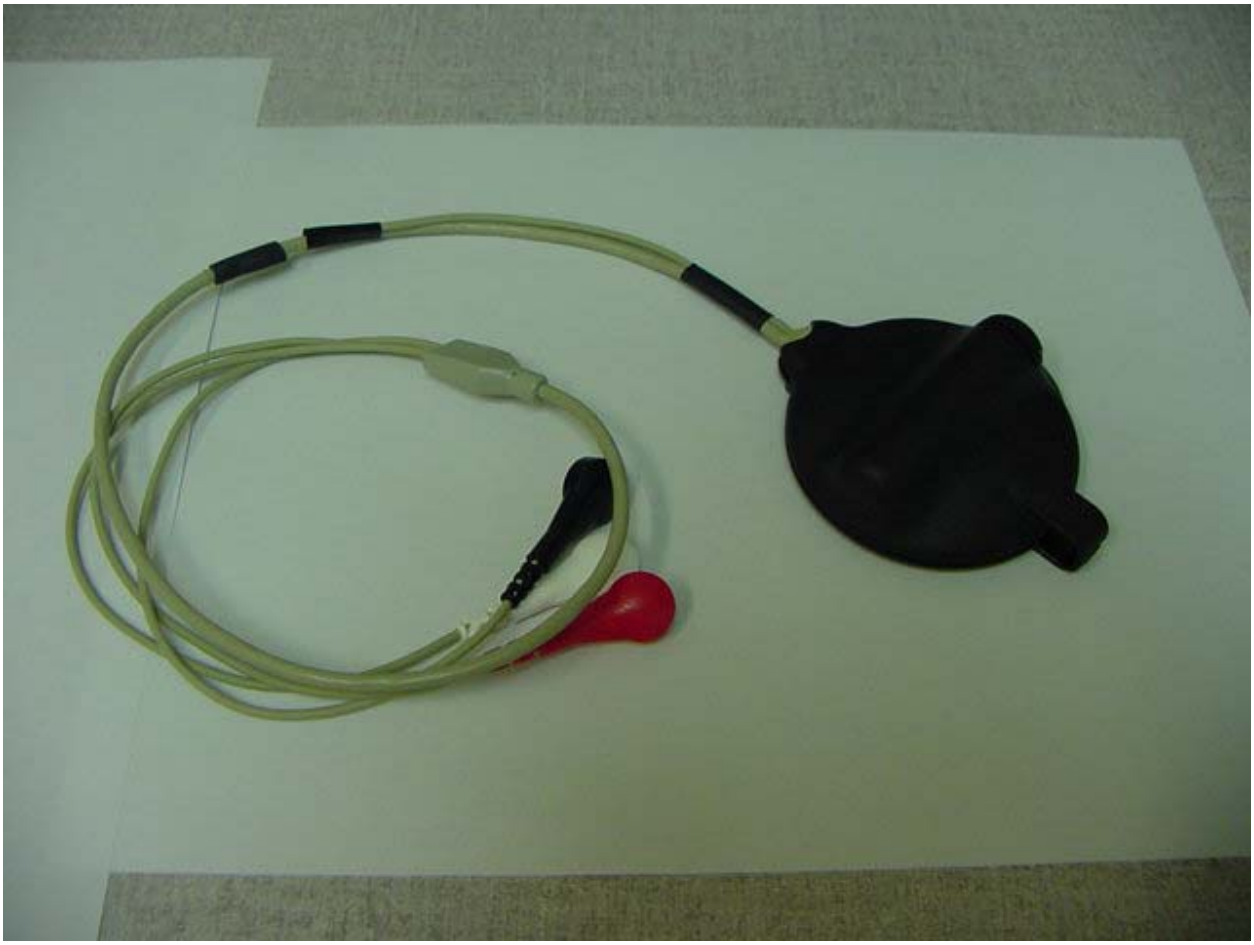
SAR measurement Test Setup

EUT Cardio Monitor

2.2 Configuration Photographs (Continued)

SAR measurement Test Setup

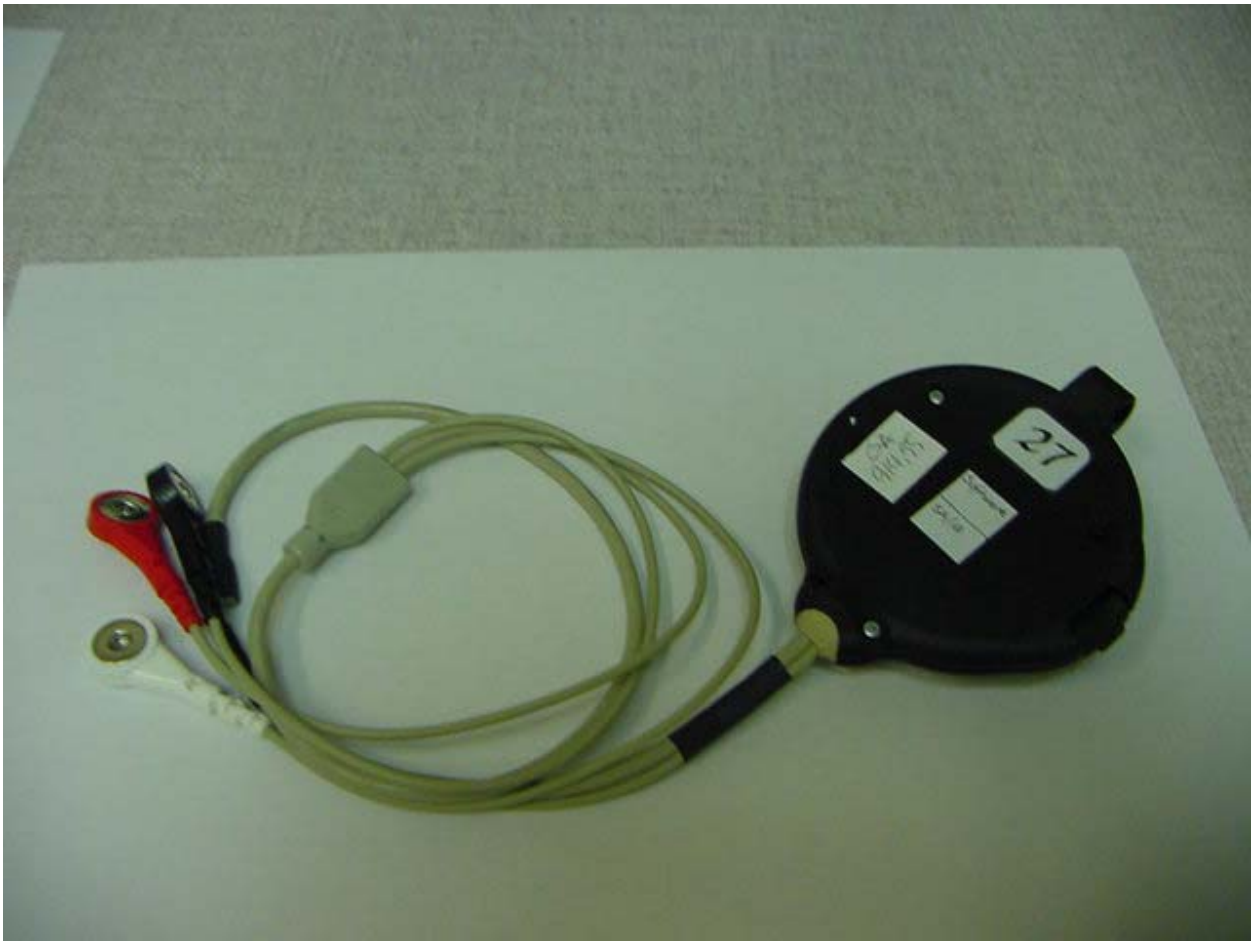
EUT Cardio Sensor



2.2 Configuration Photographs (Continued)

SAR measurement Test Setup

EUT Cardio Sensor



2.3 System Verification

Prior to the assessment, the system was verified to the ±5% of the specifications by using the system validation kit. The validation was performed at 900 MHz.

Validation kit	Targeted SAR_{1g} (mW/g)	Measured SAR_{1g} (mW/g)
D900V2	2.77	2.59

* See plot #8

2.4 Evaluation Procedures

The SAR evaluation was performed with the following procedures:

a. SAR was measured at a fixed location above the reference point and used as a reference value for the assessing the power drop.

b. The SAR distribution at the exposed side of the flat Phantom was measured at a distance of 30 mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 20 mm x 20 mm. Based on this data, the area of the maximum absorption was determined by spline interpolation.

c. Around this point, a volume of 32 mm x 32 mm x 34 mm was assessed by measuring 5 x 5 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

   i) The data at the surface were extrapolated, since the center of the dipoles is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measurement point is 1.6 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in Z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.

   ii) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum, the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3-D spline interpolation algorithm. The 3-D spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y and z directions). The volume was integrated with the trapezoidal algorithm. 1000 points (10 x 10 x 10) were interpolated to calculate the average.

   iii) All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

d. Re-measurements of the SAR value at the same location as in step a. above. If the value changed by more than 5 %, the evaluation was repeated.

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2.5 Test Results

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

Cardionet, Inc., Model No: 1001 Date of Test: March 28, 2002
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Measurement Results

Trade Name:	CardioNet	**Model No.:**	1001
Serial No.:	11006	**Test Engineer:**	Suresh Kondapalli

TEST CONDITIONS			
Ambient Temperature	23.5 °C	Relative Humidity	55 %
Test Signal Source	Test Mode	Signal Modulation	CW
Output Power Before SAR Test	See Page 7	Output Power After SAR Test	No change
Test Duration	20 Min. each test	Number of Battery Change	New battery for each scan

SAR Test Results for CardioMonitor

Configuration A Back Side touching the Phantom					
Frequency MHz	**Operating Mode**	**Crest Factor**	**Measured SAR_{1g} (mW/g)**	**Measured SAR_{10g} (mW/g)**	**Plot Number**
824	CW	1	1.07	0.718	1
835	CW	1	0.929	0.619	2
848	CW	1	0.652	0.436	3

Configuration B Front Side touching the Phantom					
Frequency MHz	**Operating Mode**	**Crest Factor**	**Measured SAR_{1g} (mW/g)**	**Measured SAR_{10g} (mW/g)**	**Plot Number**
824	CW	1	1.24	0.834	4
835	CW	1	1.08	0.716	5
848	CW	1	0.847	0.561	6

SAR Test Results for CardioSensor

Sensor touching the Phantom					
Frequency MHz	**Operating Mode**	**Crest Factor**	**Measured SAR_{1g} (mW/g)**	**Measured SAR_{10g} (mW/g)**	**Plot Number**
915	CW	1	0.0019	0.0011	7

Note: As the SAR measured from the Sensor is very low, the SAR test for the Monitor in the ISM Band was not performed (the power of the Monitor transmitter in ISM band is about the same as Sensor, 1 mW).

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D900V2					
Frequency MHz	**Operating Mode**	**Crest Factor**	**Measured SAR_{1g} (mW/g)**	**Measured SAR_{10g} (mW/g)**	**Plot Number**
900	CW	1	2.59	1.67	8

Note: a) Worst case data were reported
b) Duty cycle factor included in the measured SAR data
c) Uncertainty of the system is not included

3.0 TEST EQUIPMENT

3.1 Equipment List

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

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

SAR Measurement System			
EQUIPMENT	SPECIFICATIONS	S/N #	LAST CAL. DATE
Robot	**Stäubli RX60L**	597412-01	N/A
	Repeatability: ± 0.025mm Accuracy: 0.806×10^{-3} degree Number of Axes: 6		
E-Field Probe	**ET3DV6**	1576	02/27/02
	Frequency Range: 10 MHz to 6 GHz Linearity: ± 0.2 dB Directivity: ± 0.1 dB in brain tissue		
Data Acquisition	**DAE3**	317	N/A
	Measurement Range: 1µV to >200mV Input offset Voltage: < 1µV (with auto zero) Input Resistance: 200 M		
Phantom	**Generic Twin V3.0**	N/A	N/A
	Type: Generic Twin, Homogenous Shell Material: Fiberglass Thickness: 2 ± 0.1 mm Capacity: 20 liter Ear spacer: 4 mm (between EUT ear piece and tissue simulating liquid)		
Simulated Tissue	**Mixture**	N/A	03/28/02
	Please see section 6.2 for details		
Power Meter	**HP 8900D** w/ 84811A sensor	3607U00673	08/08/01
	Frequency Range: 100kHz to 18 GHz Power Range: 300µW to 3W		

3.2 Muscle Tissue Simulating Liquid

Ingredients	% by Weight
Sugar	41.76
HEC	1.21
Water	56.0
Bactericide	0.27
Salt	0.76

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

Frequency (MHz)	$\boxtimes_r$ *	σ *(mho/m)	ρ **(kg/m^3)
835	53.3	0.93	1000

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

3.3 E-Field Probe Calibration

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

3.4 Measurement Uncertainty

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

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

3.5 Measurement Tractability

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

4.0 WARNING LABEL INFORMATION - USA

See users manual.

5.0 REFERENCES

1] ANSI, *ANSI/IEEE C95.1-1991: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 GHz*, The Institute of electrical and Electronics Engineers, Inc., New York, NY 10017, 1992

[2] Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997

[3] Thomas Schmid, Oliver Egger, and Niels Kuster, "Automated E-field scanning system for dosimetric assessments", *IEEE Transaction on Microwave Theory and Techniques*, vol. 44, pp. 105-113, Jan. 1996.

[4] Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetic evaluation of mobile communications equipment with know precision", IEICE Transactions on Communications, vol. E80-B, no. 5, pp.645-652, May 1997.

5] NIS81, NAMAS, "The treatment of uncertainty in EMC measurement", Tech. Rep., NAMAS Executive, National Physical Laboratory, Teddinton, Middlesex, England, 1994.

6] Barry N. Tayor and Chris E. Kuyatt, "Guidelines for evaluating and expressing the uncertainty of NIST measurement results", Tech. Rep., National Institute of Standards and Technology, 1994.

5.0 DOCUMENT HISTORY

Revision/ Job Number	Writer Initials	Date	Change
1.0 /3022595	SS	March 28, 2002	Original document

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APPENDIX A - SAR Evaluation Data

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

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

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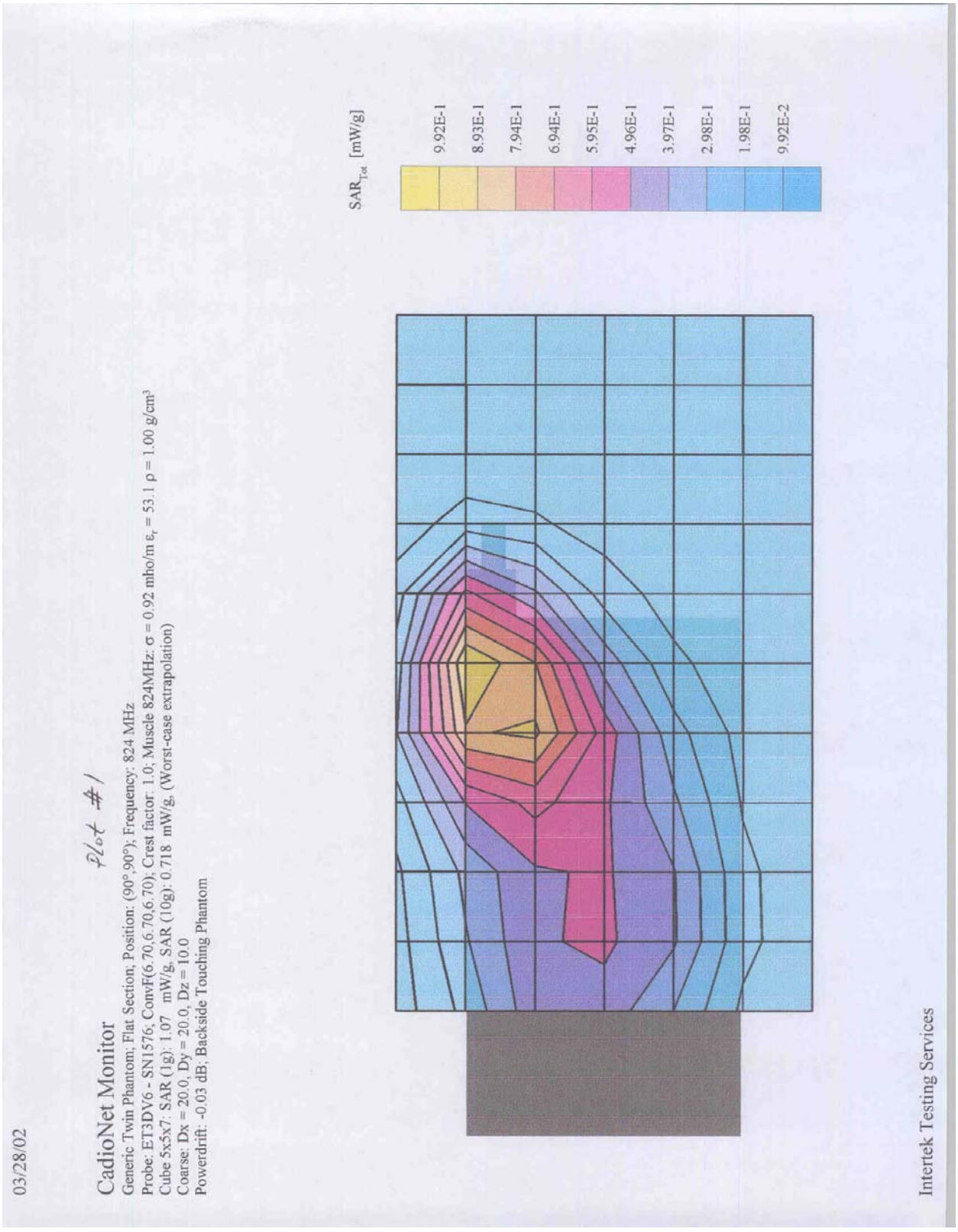

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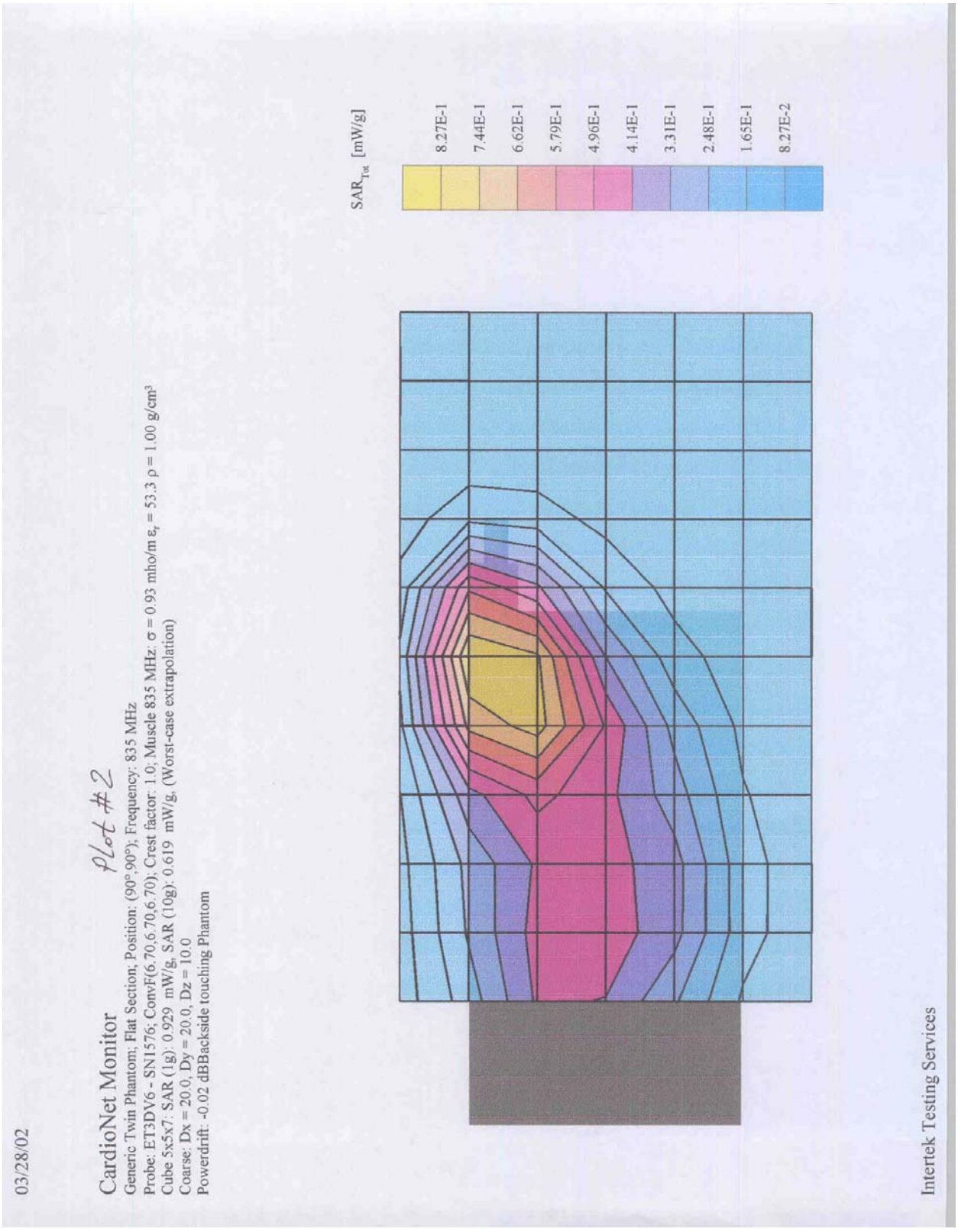

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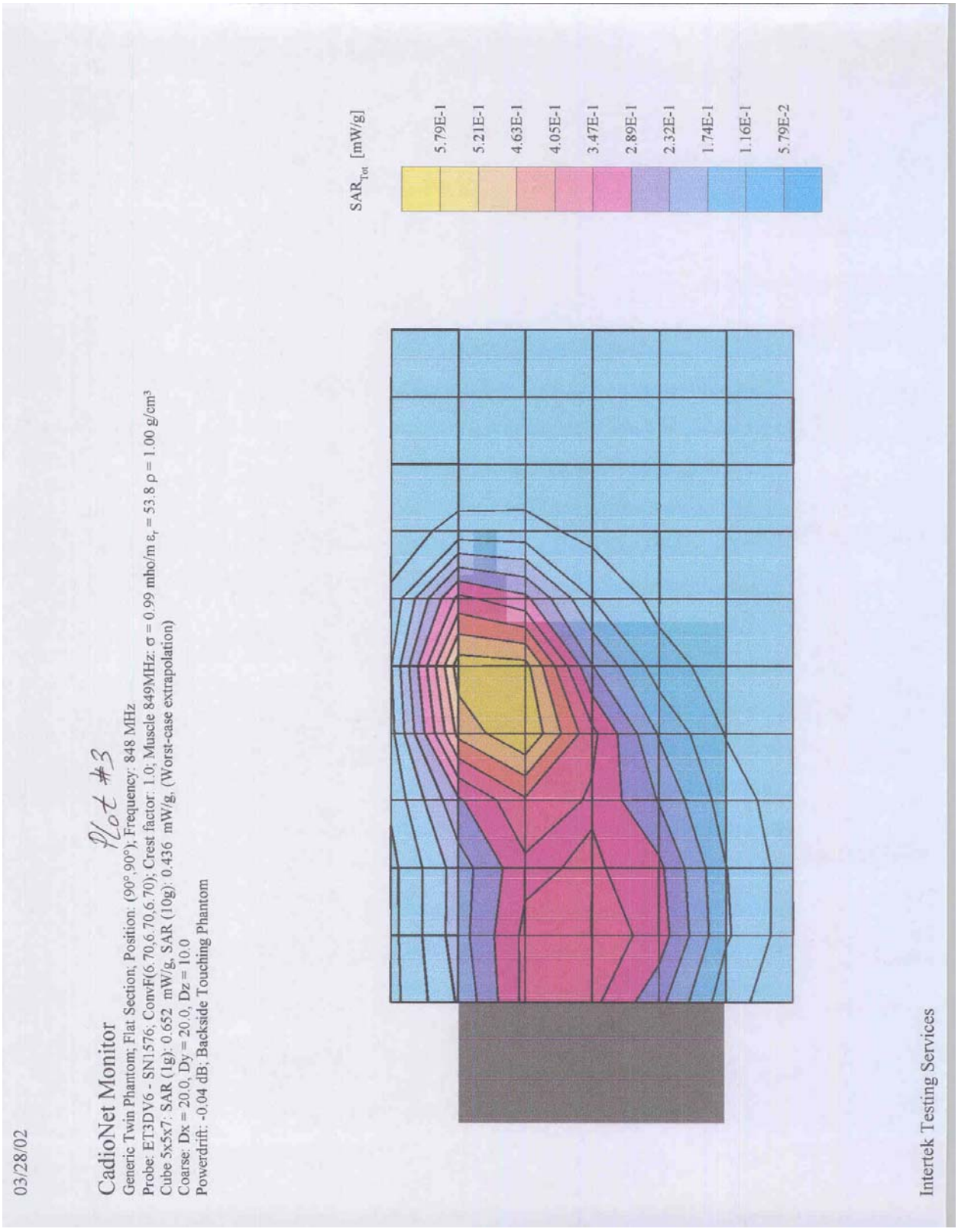

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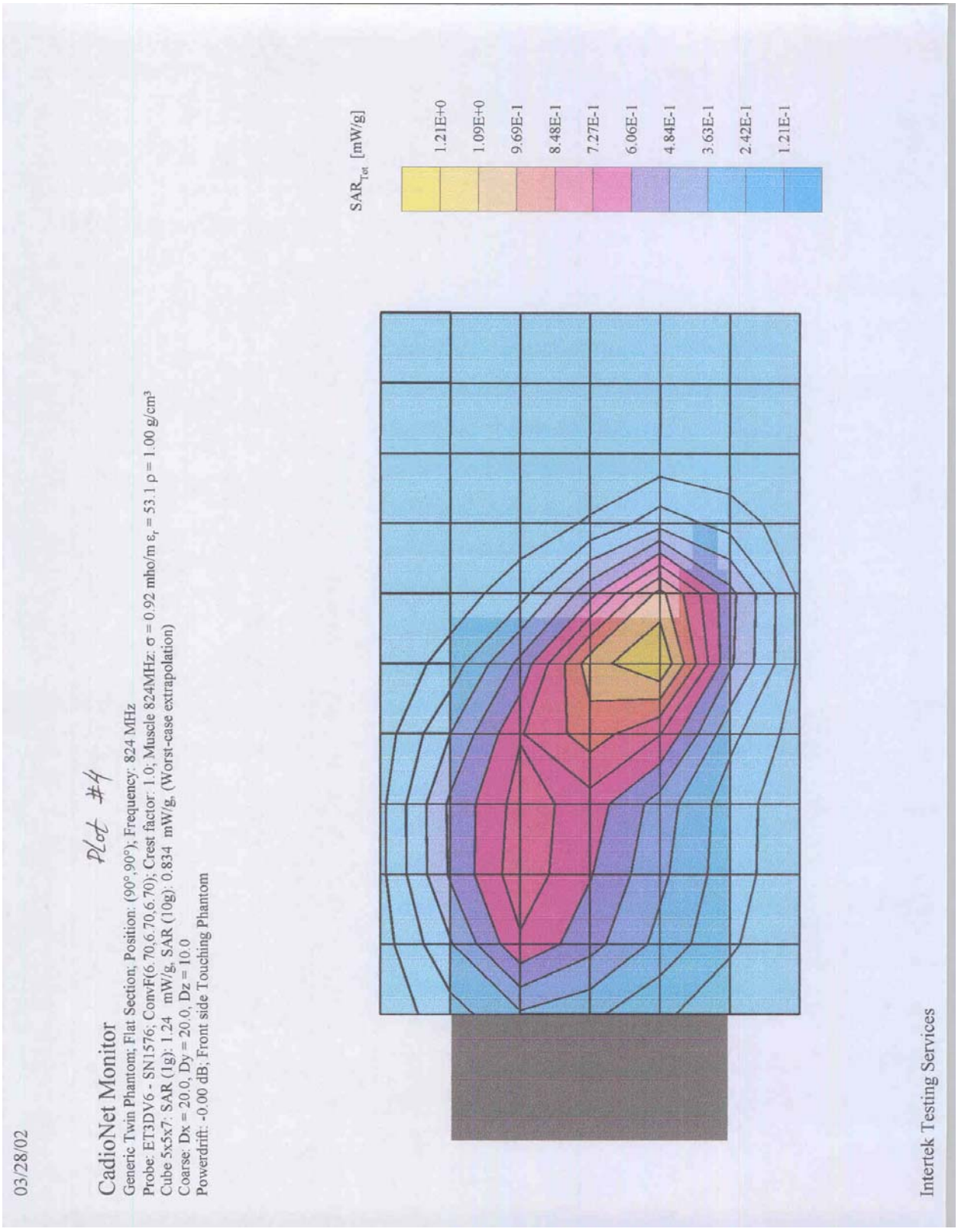

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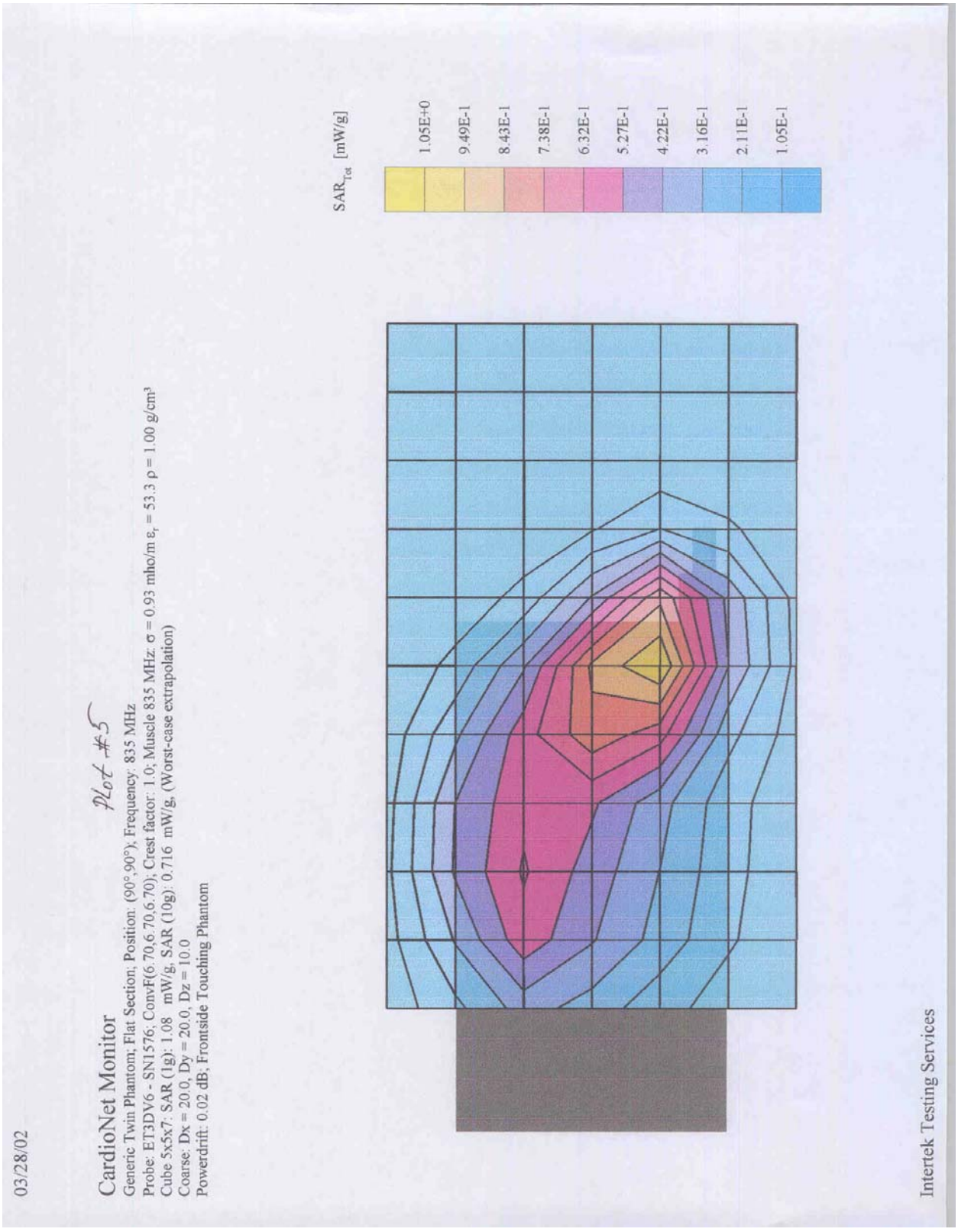

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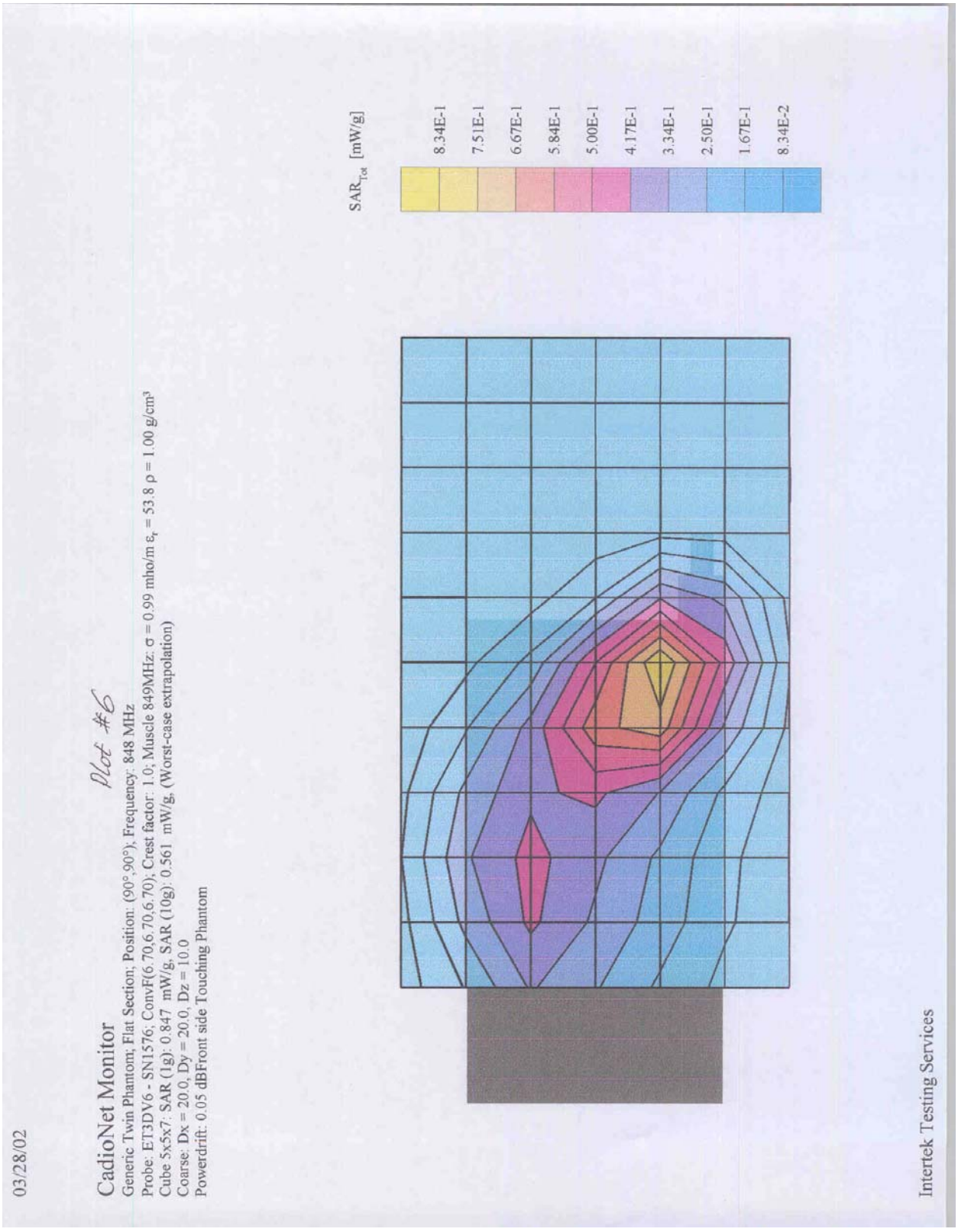
Date of Test: March 28, 2002



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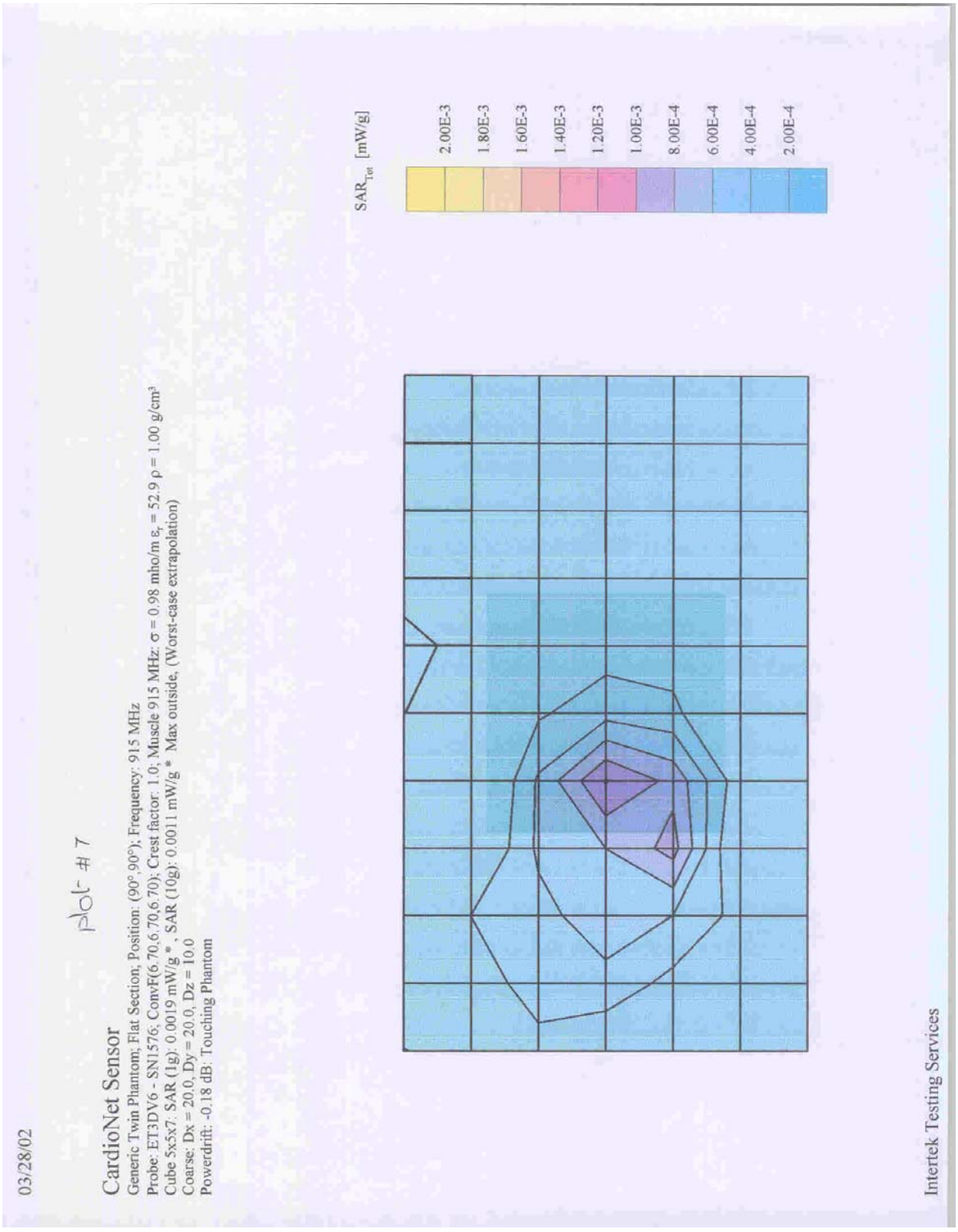

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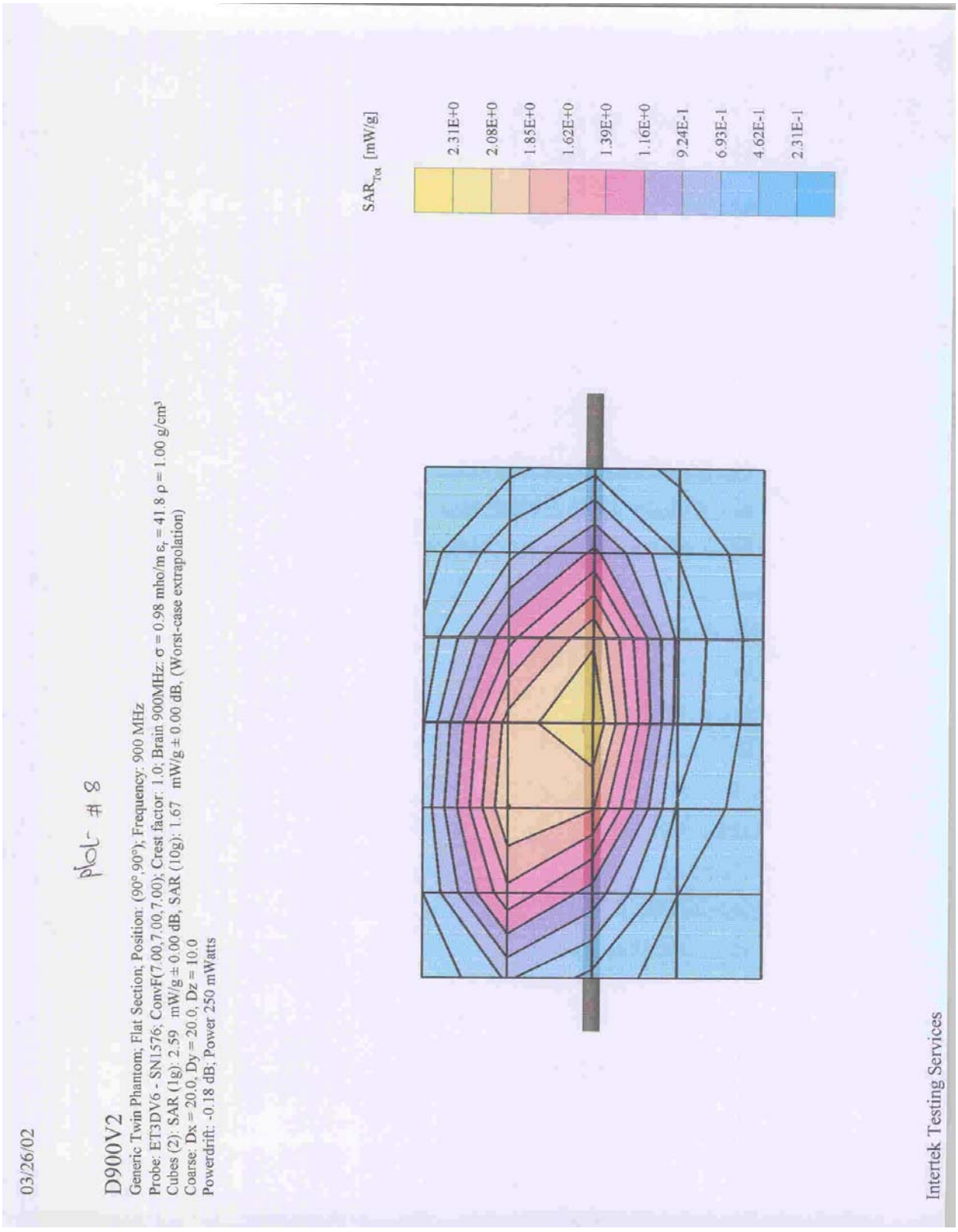

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APPENDIX B - E-Field Probe Calibration Data

See attached.

Schmid & Partner
Engineering AG

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

Calibration Certificate

Dosimetric E-Field Probe

Type:	**ET3DV6**
Serial Number:	**1576**
Place of Calibration:	**Zurich**
Date of Calibration:	**February 27, 2002**
Calibration Interval:	**12 months**

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

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

Calibrated by:

Approved by:

Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland, Telephone +41 1 245 97 00, Fax +41 1 245 97 79

Probe ET3DV6

SN:1576

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

Calibrated for System DASY3

ET3DV6 SN:1576 **February 27, 2002**

DASY3 - Parameters of Probe: ET3DV6 SN:1576

Sensitivity in Free Space

Diode Compression

NormX	**1.77** μV/(V/m)^2		DCP X	**98**	mV
NormY	**1.81** μV/(V/m)^2		DCP Y	**98**	mV
NormZ	**1.76** μV/(V/m)^2		DCP Z	**98**	mV

Sensitivity in Tissue Simulating Liquid

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

Boundary Effect

Head **900 MHz** **Typical SAR gradient: 5 % per mm**

Probe Tip to Boundary		**1 mm**	**2 mm**
SAR_{be} [%]	Without Correction Algorithm	7.6	4.3
SAR_{be} [%]	With Correction Algorithm	0.3	0.5

Head **1800 MHz** **Typical SAR gradient: 10 % per mm**

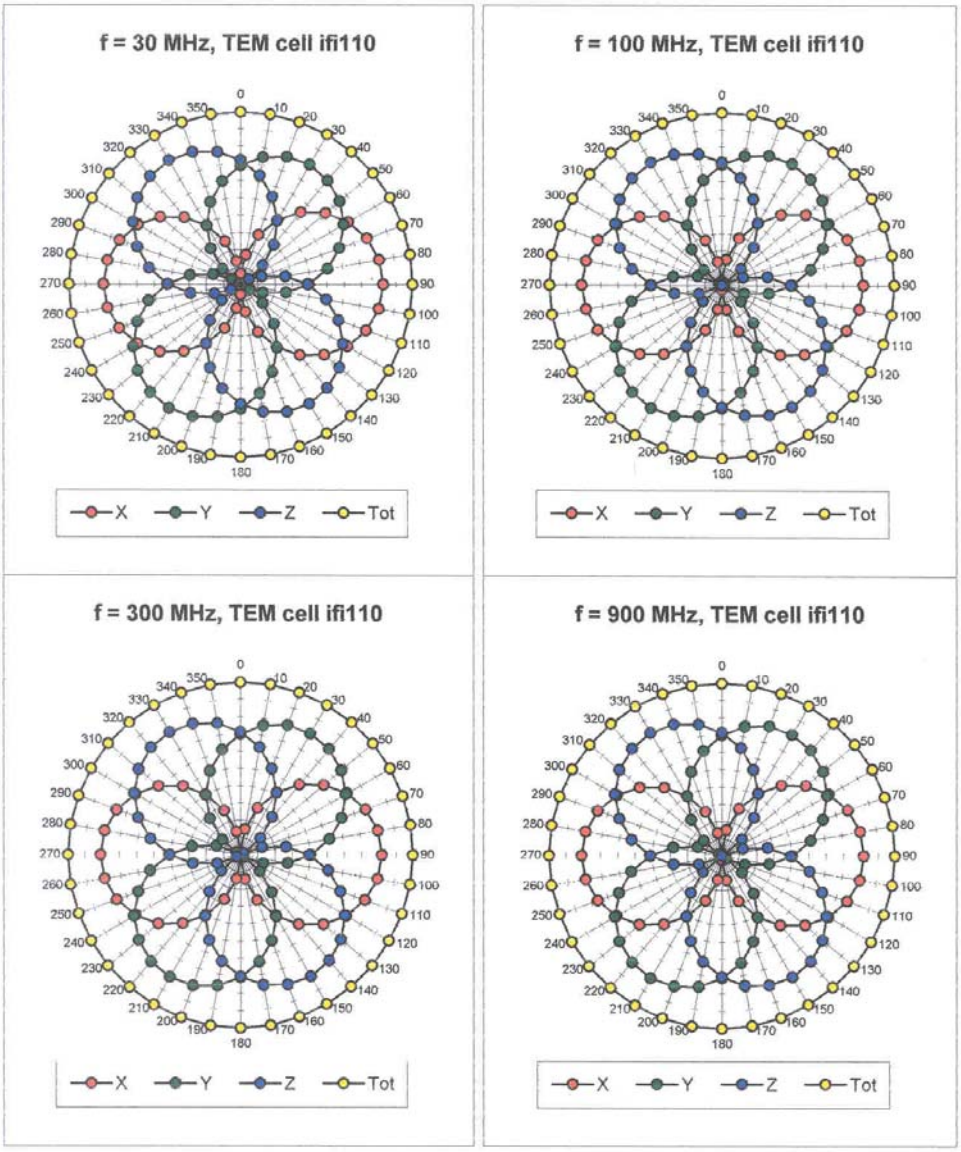
Probe Tip to Boundary		**1 mm**	**2 mm**
SAR_{be} [%]	Without Correction Algorithm	9.7	6.6
SAR_{be} [%]	With Correction Algorithm	0.2	0.3

Sensor Offset

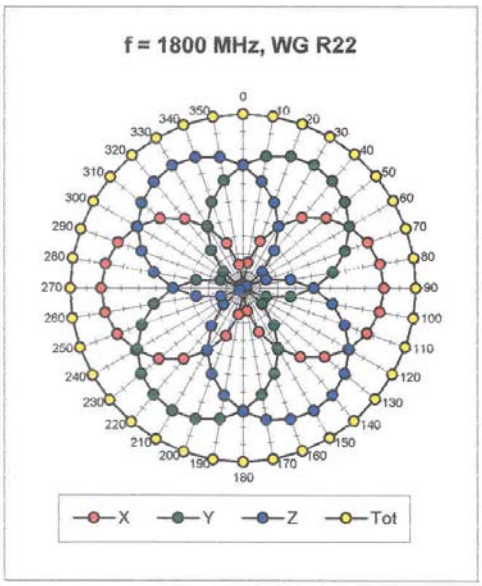
Probe Tip to Sensor Center	**2.7**	mm
Optical Surface Detection	**1.9 ± 0.2**	mm

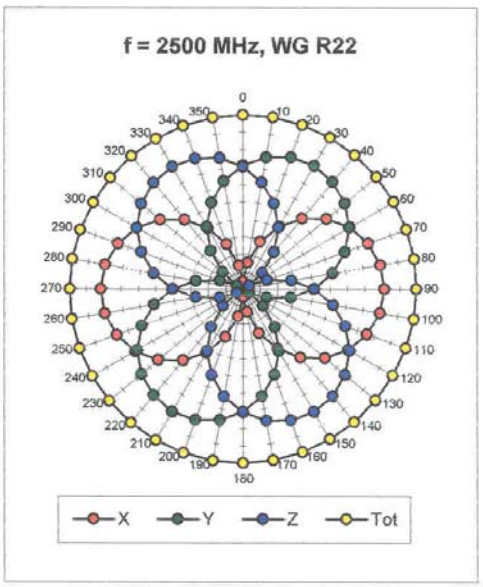
ET3DV6 SN:1576 **February 27, 2002**

Receiving Pattern (ϕ), θ = 0°

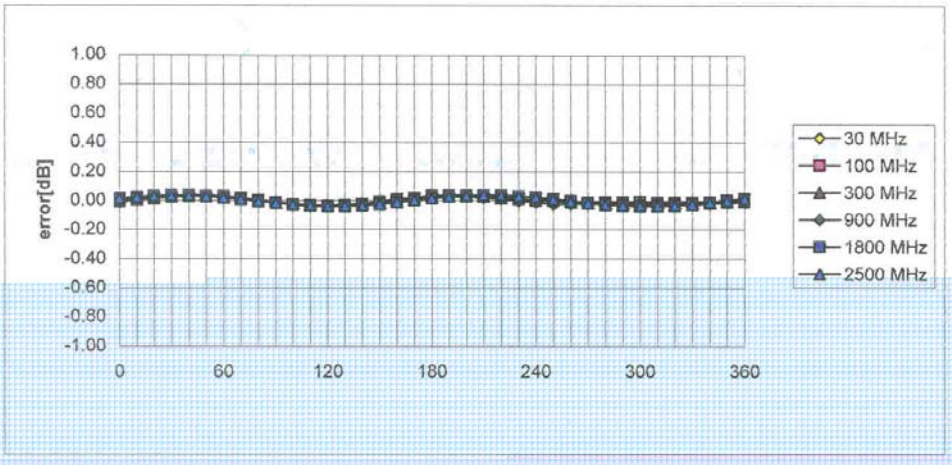


ET3DV6 SN:1576 February 27, 2002





Isotropy Error (ϕ), θ = 0°



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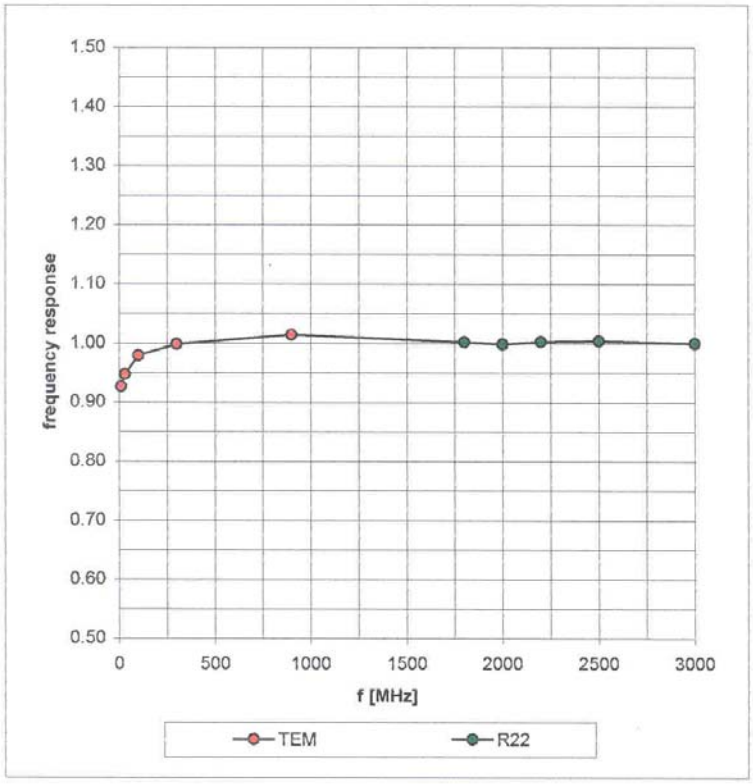
Frequency Response of E-Field

(TEM-Cell:ifi110, Waveguide R22)



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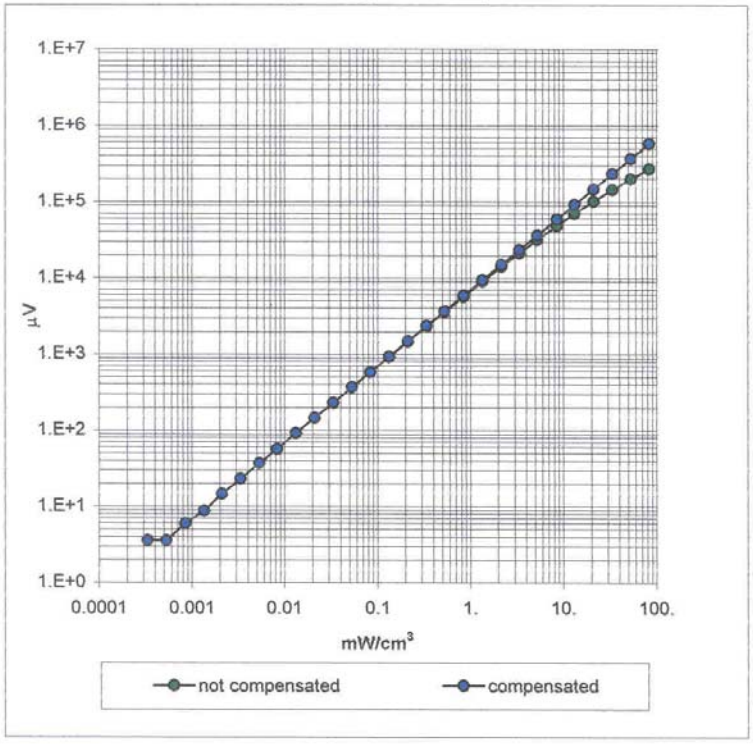
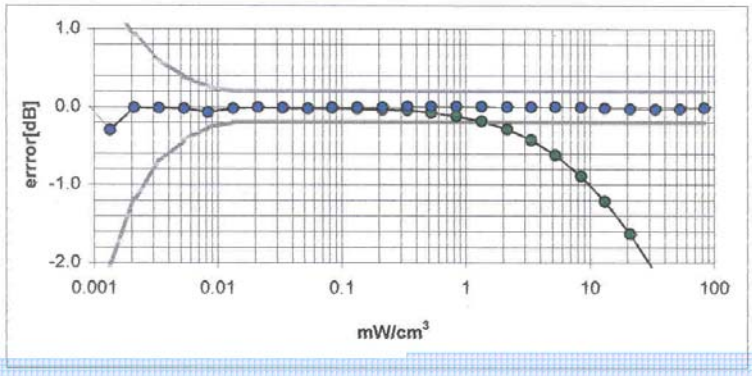
Dynamic Range f(SAR_{brain})

(Waveguide R22)





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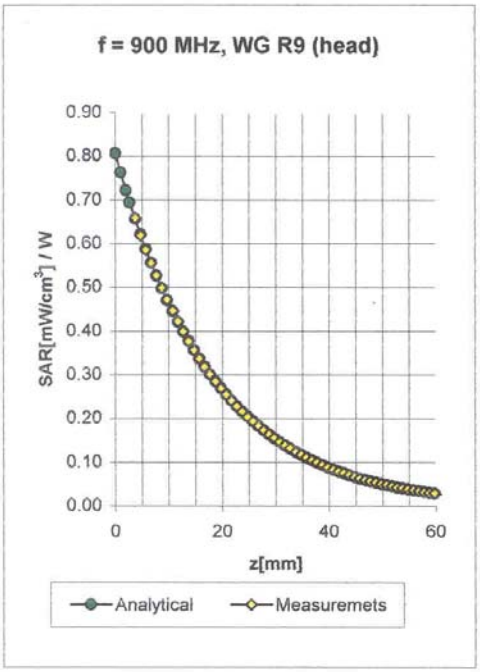
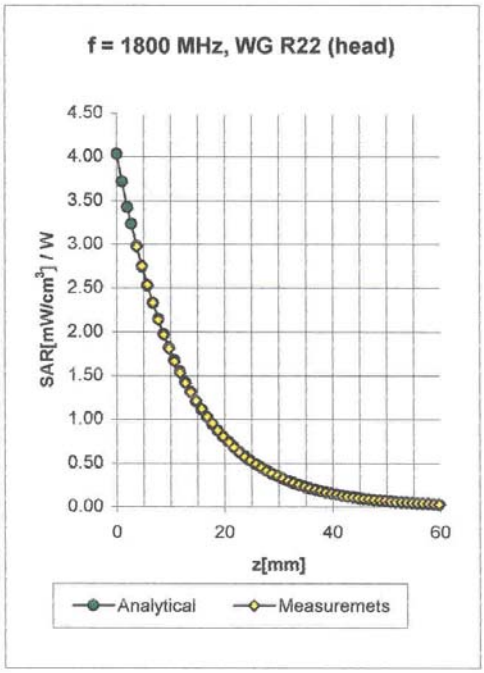
Conversion Factor Assessment





Head	**900 MHz**		ε_r **= 41.5 ± 5%**	**σ = 0.97 ± 5% mho/m**	
Head	**835 MHz**		ε_r **= 41.5 ± 5%**	**σ = 0.90 ± 5% mho/m**	
	ConvF X	**7.0** ± 9.5% (k=2)		Boundary effect:	
	ConvF Y	**7.0** ± 9.5% (k=2)		Alpha	**0.30**
	ConvF Z	**7.0** ± 9.5% (k=2)		Depth	**2.51**

Head	**1800 MHz**		ε_r **= 40.0 ± 5%**	**σ = 1.40 ± 5% mho/m**	
Head	**1900 MHz**		ε_r **= 40.0 ± 5%**	**σ = 1.40 ± 5% mho/m**	
	ConvF X	**5.4** ± 9.5% (k=2)		Boundary effect:	
	ConvF Y	**5.4** ± 9.5% (k=2)		Alpha	**0.45**
	ConvF Z	**5.4** ± 9.5% (k=2)		Depth	**2.30**

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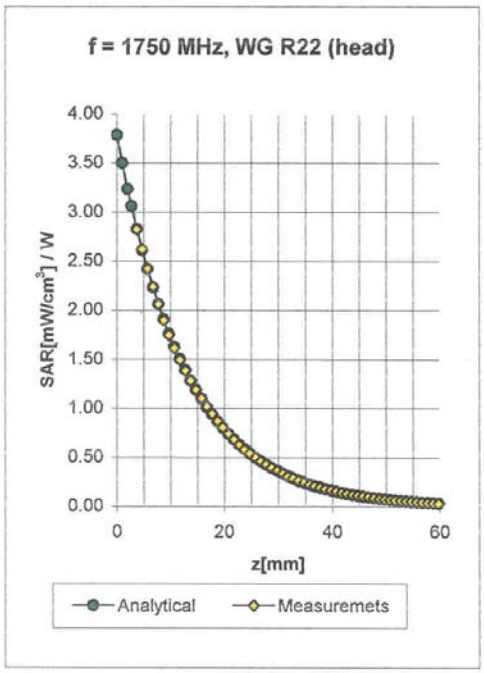
Conversion Factor Assessment



Head **1750 MHz** ε_r = 40.0 ± 5% σ = 1.40 ± 5% mho/m

ConvF X	**5.4** ± 8.9% (k=2)	Boundary effect:	
ConvF Y	**5.4** ± 8.9% (k=2)	Alpha	**0.45**
ConvF Z	**5.4** ± 8.9% (k=2)	Depth	**2.27**

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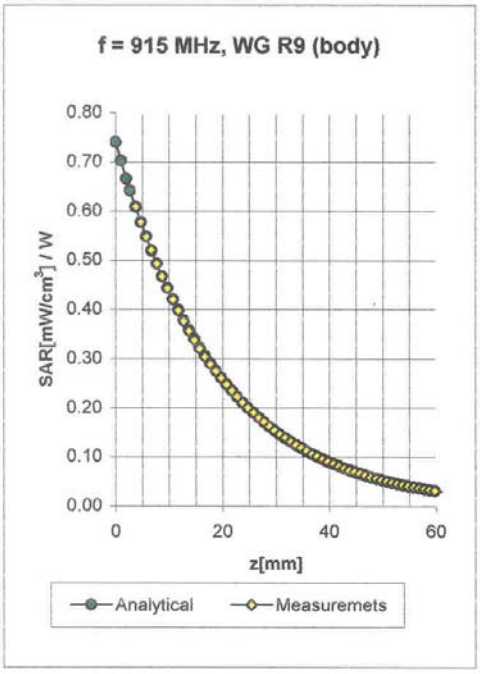
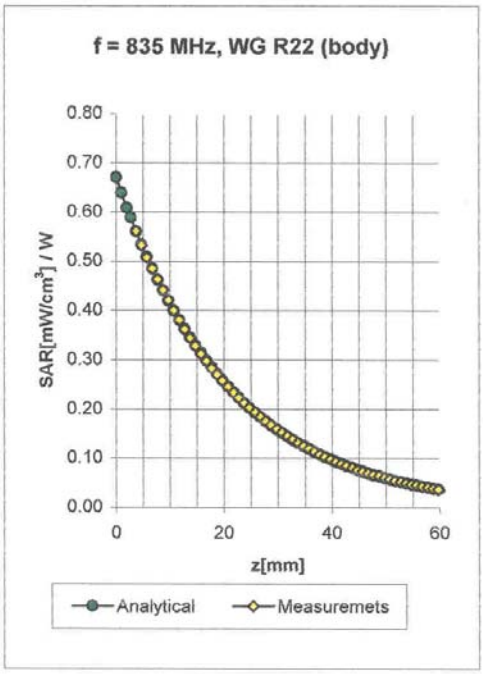
Conversion Factor Assessment





Body **915 MHz** ε_r **= 55.0 ± 5%** σ **= 1.06 ± 5% mho/m**

ConvF X	**6.7** ± 8.9% (k=2)	Boundary effect:	
ConvF Y	**6.7** ± 8.9% (k=2)	Alpha	**0.45**
ConvF Z	**6.7** ± 8.9% (k=2)	Depth	**2.01**

Body **835 MHz** ε_r **= 55.2 ± 5%** σ **= 0.97 ± 5% mho/m**

ConvF X	**6.7** ± 8.9% (k=2)	Boundary effect:	
ConvF Y	**6.7** ± 8.9% (k=2)	Alpha	**0.34**
ConvF Z	**6.7** ± 8.9% (k=2)	Depth	**2.37**

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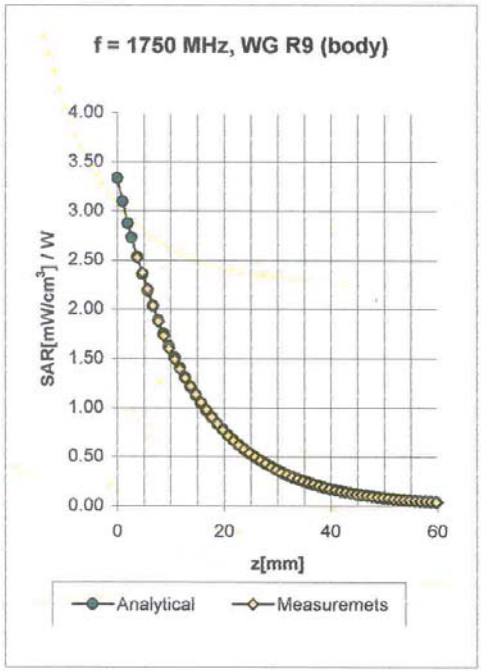
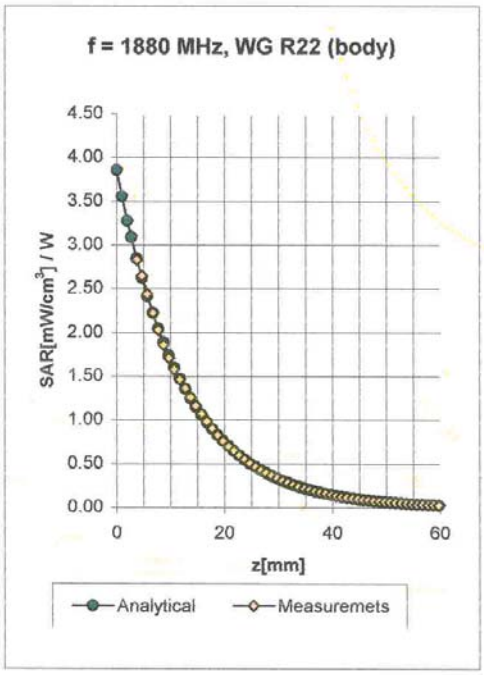
Conversion Factor Assessment





Body **1750 MHz** ε_r = 53.3 ± 5% σ = 1.52 ± 5% mho/m

ConvF X	**5.1** ± 8.9% (k=2)	Boundary effect:	
ConvF Y	**5.1** ± 8.9% (k=2)	Alpha	**0.51**
ConvF Z	**5.1** ± 8.9% (k=2)	Depth	**2.31**

Body **1880 MHz** ε_r = 53.3 ± 5% σ = 1.52 ± 5% mho/m

ConvF X	**4.8** ± 8.9% (k=2)	Boundary effect:	
ConvF Y	**4.8** ± 8.9% (k=2)	Alpha	**0.63**
ConvF Z	**4.8** ± 8.9% (k=2)	Depth	**2.10**

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Deviation from Isotropy in HSL

Error (θ,ϕ), f = 900 MHz