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## Report

# **Dosimetric Assessment of the Victor Reader Stream from HumanWare (FCC ID: XT5503VRC) (IC: 8670A-503VRC)**

## **According to the FCC Requirements**

May 06, 2013

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## Executive Summary

The device Victor Reader Stream is a new handheld media player from HumanWare operating in the 2450 MHz frequency range. The device has an integrated antenna and the system concepts used are the IEEE 802.11 b/g/n standards. There is no simultaneous transmission mode available.

The objective of the measurements done by IMST was the dosimetric assessment of one device in body worn configuration in the IEEE 802.11 b/g/n standards. Since there was a special test software available, SAR tests in IEEE 802.11 b/g/n are conducted with a specific channel, bandwidth and maximum output power. The device was tested in two positions with the housing of the handheld in direct contact against the flat phantom. The examinations have been carried out with the dosimetric assessment system „DASY4“.

The measurements were made according to the Supplement C to OET Bulletin 65 of the Federal Communications Commission (FCC) Guidelines [OET 65] for evaluating compliance of mobile and portable devices with FCC limits for human exposure (general population) to radiofrequency emissions and IC RSS 102 Issue 4.

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

- SAR Measurement Requirements for 100 MHz to 6 GHz [KDB 865664 D01 v01]
- Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies [KDB 447498 D01 v05]
- SAR Measurement Procedures for 802.11 a/b/g Transmitters KDB 248227 Rev. 1.2

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

## Compliance Statement

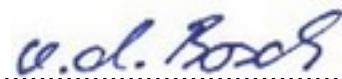
The portable device Victor Reader Stream from HumanWare (FCC ID: XT5503VRC, IC: 8670A-503VRC) is in compliance with the IC RSS 102 Issue 4 [RSS 102] and Federal Communications Commission (FCC) Guidelines [OET 65] for uncontrolled exposure. SAR assessment in body worn was conducted with a distance of 0 mm between the housing of the device and the flat phantom.

The maximum results of SAR for the Victor Reader Stream are as follows:

Test Position	Frequency Band	Channel	Position	Highest Reported SAR <sub>1g</sub> [W/kg]
Body Worn	IEEE 802.11 b	1	1 (Fig. 10)	0.749

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## 1 Subject of Investigation

The device Victor Reader Stream is a new handheld media player from HumanWare operating in the 2450 MHz frequency range. The device has an integrated antenna and the system concepts used are the IEEE 802.11 b/g/n standards. There is no simultaneous transmission mode available.



Fig. 1: Pictures of the device under test.

The objective of the measurements done by IMST was the dosimetric assessment of one device in body worn configuration in the IEEE 802.11 b/g/n standards. Since there was a special test software available, SAR tests in IEEE 802.11 b/g/n are conducted with a specific channel, bandwidth and maximum output power. The device was tested in two positions with the housing of the handheld in direct contact against the flat phantom. The examinations have been carried out with the dosimetric assessment system „DASY4“.

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

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

Both IEEE standards sets limits for human exposure to radio frequency electromagnetic fields in the frequency range 3 kHz to 300 GHz. One of the major differences in the newly revised C95.1-2005 is the change in the basic restrictions for localized exposure, from 1.6 W/kg averaged over 1 g tissue to 2.0 W/kg averaged over 10 g tissue, which is now identical to the ICNIRP guidelines [ICNIRP 1998].

## 2.1 Distinction Between Exposed Population, Duration of Exposure and Frequencies

The American Standard [IEEE C95.1-1999] distinguishes between controlled and uncontrolled environment. Controlled environments are locations where there is exposure that may be incurred by persons who are aware of the potential for exposure as a concomitant of employment or by other cognizant persons. Uncontrolled environments are locations where there is the exposure of individuals who have no knowledge or control of their exposure. The exposures may occur in living quarters or workplaces. For exposure in controlled environments higher field strengths are admissible. In addition the duration of exposure is considered.

Due to the influence of frequency on important parameters, as the penetration depth of the electromagnetic fields into the human body and the absorption capability of different tissues, the limits in general vary with frequency.

## 2.2 Distinction between Maximum Permissible Exposure and SAR Limits

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength  $E$  inside the human body, the conductivity  $\sigma$  and the mass density  $\rho$  of the biological tissue:

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

The specific absorption rate describes the initial rate of temperature rise  $\partial T / \partial t$  as a function of the specific heat capacity  $c$  of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric  $E$  and magnetic field strength  $H$  and power density  $S$ , derived from the SAR limits. The limits for  $E$ ,  $H$  and  $S$  have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded.

For the relevant frequency range the maximum permissible exposure may be exceeded if the exposure can be shown by appropriate techniques to produce SAR values below the corresponding limits.

### 2.3 General SAR Limit

In this report the comparison between the American exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and mobile respectively portable transmitters. According to Table 1 the SAR values have to be averaged over a mass of 1 g ( $SAR_{1g}$ ) with the shape of a cube.

Standard	Status	SAR limit [W/kg]
IEEE C95.1-1999	Replaced	1.6

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

## 3 The FCC Measurement Procedure

The Federal Communications Commission (FCC) has published a report and order on the 1<sup>st</sup> of August 1996 [FCC 96-326], which requires routine dosimetric assessment of mobile telecommunications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. In 2001 the Commission's Office of Engineering and Technology has released Edition 01-01 of Supplement C to OET Bulletin 65. This revised edition, which replaces Edition 97-01, provides additional guidance and information for evaluating compliance of mobile and portable devices with FCC limits for human exposure to radiofrequency emissions [OET 65].

### 3.1 General Requirements

The test shall be performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature shall be in the range of 20°C to 26°C and 30-70% humidity.

### 3.2 Tests in Body Worn Configuration according KDB 447498

Devices that support transmission while used with body worn accessories must be tested for body worn accessory SAR compliance. All body worn tests have to be conducted with the same distance between DUT and SAM phantom. Therefore voice and data transmission requirements must be determined according to the wireless technologies and operating characteristics of the individual device. Devices that are designed to operate on the body of users using lanyards and straps, or without requiring additional body worn accessories, must be tested for SAR compliance using a conservative minimum test separation distance  $\leq 5$  mm to support compliance. Nevertheless, all accessories that contain metallic components must be tested for compliance additionally.

### 3.3 Additional Information for 802.11 a/b/g Transmitters according KDB 248227

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

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

- Using of chipset based test mode software to ensure consistent and reliable results
- The SAR is measured for the “default test channels” listed below as given by the FCC
- SAR measurements for 802.11g channels when the maximum avg output power is less than  $\geq 0.25$  dB higher than the values for the corresponding 802.11b channels
- The avg. output power for 802.11a should be measured on all channels in each frequency band
- If the channel with the maximum avg. output power is not included in the default test channels, this channel should be tested instead of an adjacent default test channel
- For multiple channel bandwidth configurations, the configuration with the highest output power limit should be tested.
- Each channel should be tested at the lowest data rate in each a/b/g mode
- Each channel should be tested at the lowest data rate in each b/g/n mode.

Mode 802.11	Frequency [MHz]	Channel	Turbo Channel	Default Test Channels			UNII	
				§ 15.247				
				802.11b	802.11g			
b / g	2412	1°		x	^			
	2437	6	6	x	^			
	2462	11°		x	^			

Table 2: Default Test channels given by the FCC

**X:** default test channels

**\***: possible 802.11a channels with maximum avg output > the default test channels

**^**: possible 802.11g channels with maximum avg output  $\geq 0.25$  dB higher than the default test channels

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

## 4 The Measurement System

DASY is an abbreviation of „Dosimetric Assessment System“ and describes a system that is able to determine the SAR distribution inside a phantom of a human being according to different standards. The DASY4 system consists of the following items as shown in Fig: 2. Additional Fig: 3 shows the equipment, similar to the installations in other laboratories.

- High precision robot with controller
- Measurement server (for surveillance of the robot operation and signal filtering)
- Data acquisition electronics DAE (for signal amplification and filtering)
- Field probes calibrated for use in liquids
- Electro-optical converter EOC (conversion from the optical into a digital signal)
- Light beam (improving of the absolute probe positioning accuracy)
- Two SAM phantoms filled with tissue simulating liquid
- DASY4 software
- SEMCAD

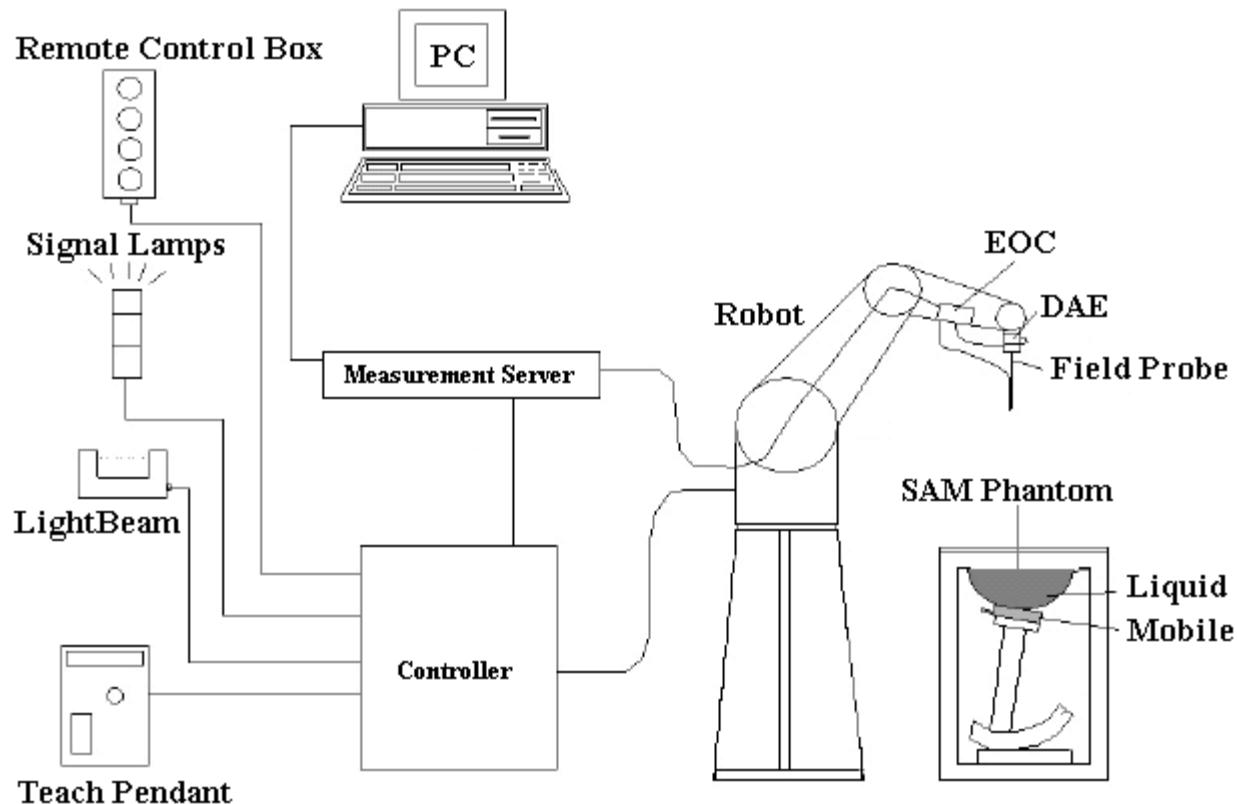


Fig. 2: The DASY4 measurement system.



Fig. 3: The measurement set-up with two SAM phantoms containing tissue simulating liquid.

The device operating at the maximum power level is placed by a non metallic device holder (delivered from Schmid & Partner) in the above described positions at a shell phantom of a human being. The distribution of the electric field strength  $E$  is measured in the tissue simulating liquid within the shell phantom. For this miniaturised field probes with high sensitivity and low field disturbance are used. Afterwards the corresponding SAR values are calculated with the known electrical conductivity  $\sigma$  and the mass density  $\rho$  of the tissue in the SEMCAD FDTD software. The software is able to determine the averaged SAR values (averaging region 1 g or 10 g) for compliance testing.

The measurements are done by two scans: first a coarse scan determines the region of the maximum SAR, afterwards the averaged SAR is measured in a second scan within the shape of a cube. The measurement time takes about 20 minutes.

#### 4.1 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM Twin Phantom V4.0) defined by the IEEE SCC-34/SC2 group and delivered by Schmid & Partner Engineering AG is used. The phantom is a fibreglass shell integrated in a wooden table. The thickness of the phantom amounts to  $2 \text{ mm} \pm 0.2 \text{ mm}$ . It enables the dosimetric evaluation of left and right hand phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a coverage (polyethylene), which prevents the evaporation of the liquid. The details and the Certificate of conformity can be found in Fig. 7.

## 4.2 Probe

For the measurements the Dosimetric E-Field Probes ET3DV6R or EX3DV4 with following specifications are used. They are manufactured and calibrated in accordance with FCC [OET 65] and IEEE [IEEE 1528-2003] recommendations annually by Schmid & Partner Engineering AG.

ET3DV6:

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

EX3DV4:

- Dynamic range:  $10\mu\text{W/g}$  to  $> 100\text{mW/g}$  (noise typically  $< 1\mu\text{W/g}$ )
- Tip diameter: 2.5 mm
- Probe linearity:  $\pm 0.2$  dB (30 MHz to 6 GHz)
- Axial isotropy:  $\pm 0.2$  dB
- Spherical isotropy:  $\pm 0.4$  dB
- Distance from probe tip to dipole centers: 1.0 mm
- Calibration range: 1950 MHz / 2450MHz / 3500 MHz / 5200 MHz / 5500 MHz / 5800 MHz for head and body simulating liquid
- Angle between probe axis (evaluation axis) and surface normal line: less than  $30^\circ$

### 4.3 Measurement Procedure

The following steps are used for each test position:

- Establish a call with the maximum output power with a base station simulator. The connection between the mobile phone and the base station simulator is established via air interface.
- Measurement of the local E-field value at a fixed location (P1). This value serves as a reference value for calculating a possible power drift.
- Measurement of the SAR distribution with resolution settings for area scan and zoom scan according KDB 865664 D01 as shown in Table 3.
- The used extrapolation and interpolation routines are all based on the modified Quadratic Shepard's method [DASY4].
- Repetition of the E-field measurement at the fixed location (P1) and repetition of the whole procedure if the two results differ by more than  $\pm 0.21\text{dB}$ .

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

Table 3: Parameters for SAR scan procedures.

#### 4.4 Uncertainty Assessment

Table 4 includes the worst case uncertainty budget suggested by the [IEEE 1528-2003] and determined by Schmid & Partner Engineering AG. The expanded uncertainty (K=2) is assessed to be  $\pm 21.7\%$  and is valid up to 3.0 GHz.

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

Table 4: Uncertainty budget of DASY4.

## 5 Output Power Values

AVARAGE OUTPUT POWER FOR IEEE 802.11 b [dBm]						
Mode	Freq. [MHz]	CH	Data Rate [Mbit/s]			
			1	2	5.5	11
b	2412	1	15.2	15.8	15.5	15.2
	2437	6	15.6	15.8	15.3	15.4
	2462	11	15.8	15.8	15.5	15.3

Table 5: Conducted output power values for b-mode for HumanWare Victor Reader Stream.

AVARAGE OUTPUT POWER FOR IEEE 802.11 g [dBm]								
Mode	Frequency [MHz]	CH	Data Rate [Mbit/s]					
			6	9	12	18	24	36
g	2412	1	14.5	14.5	14.4	14.5	14.6	14.6
	2437	6	14.5	14.5	14.5	14.6	14.6	14.8
	2462	11	14.4	14.4	14.5	14.3	14.5	14.4

Table 6: Conducted output power values for g-mode for HumanWare Victor Reader Stream.

AVARAGE OUTPUT POWER FOR IEEE 802.11 n [dBm]								
Mode	Frequency [MHz]	CH	Data Rate [Mbit/s]					
			MCS0	MCS1	MCS2	MCS3	MCS4	MCS5
n (800ns)	2412	1	14.3	14.4	14.4	14.8	14.9	14.4
	2437	6	14.5	14.4	14.6	15.0	14.9	14.7
	2462	11	14.3	14.4	14.3	14.7	14.7	14.4
n (400ns)	2412	1	14.1	14.4	14.3	14.6	14.4	14.3
	2437	6	14.6	14.6	14.5	14.8	14.6	14.6
	2462	11	14.3	14.3	14.2	14.7	14.4	14.3

Table 7: Conducted output power values for n-mode (800 ns GI and 400 ns GI) for HumanWare Victor Reader Stream.

### 5.1 Tune-Up Information

Maximum transmit output power [dBm]			
Band	2.45 GHz range		
	b-mode	g-mode	n-mode
IEEE 802.11	17.0	16.1	16.0

Table 8: Maximum transmit output power values for HumanWare Victor Reader Stream.

## 6 SAR Test Results

The tables below contain the measured SAR values for IEEE 802.11b averaged over a mass of 1 g. SAR assessment was conducted in the worst case configuration with output power values according Table 5 - Table 7. The maximum output power is based on the linear average of the output power listed in Table 5 - Table 7 +1.5 dB and calculated in Table 8.

According KDB 248227 Rev. 1.2, SAR is not required for 802.11g/n channels when the maximum average output power is less than  $\frac{1}{4}$  dB higher than that measured on the corresponding 802.11b channels.

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

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

Reported SAR = measured SAR \* scaling factor

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

Band	Mode	Freq [MHz]	Channel	Test Position	Figure No.	Tune-Up Limtt [dBm]	Output Power [dBm]	Measured SAR <sub>1g</sub> [W/kg]	Power Drift [dBm]	Scaling Factor	Reported SAR	Plot No.
2.4 GHz	b	2437	6	1	10	17.0	15.6	0.436	-0.091	1.380	0.602	1
				2	11		15.6	0.070	0.143	1.380	0.097	2
		2412	1	1	10		15.2	0.495	-0.015	1.514	0.749	3
		2462	11	1	10		15.8	0.302	0.149	1.318	0.398	4

Table 9: Measurement results for IEEE 802.11b for the HumanWare Victor Reader Stream.

To control the output power stability during the SAR test the used DASY4 system calculates the power drift by measuring the e-field at the same location at the beginning and at the end of the measurement for each test position. These drift values can be found in the above tables labeled as: (Drift[dB]). This ensures that the power drift during one measurement is within 5%. Please note that we add the measured "power drift" values from the DASY4 system.

## 7 Evaluation

In Figure 4 the flat phantom SAR results for IEEE 802.11b given in Table 9 are summarized and compared to the limit.

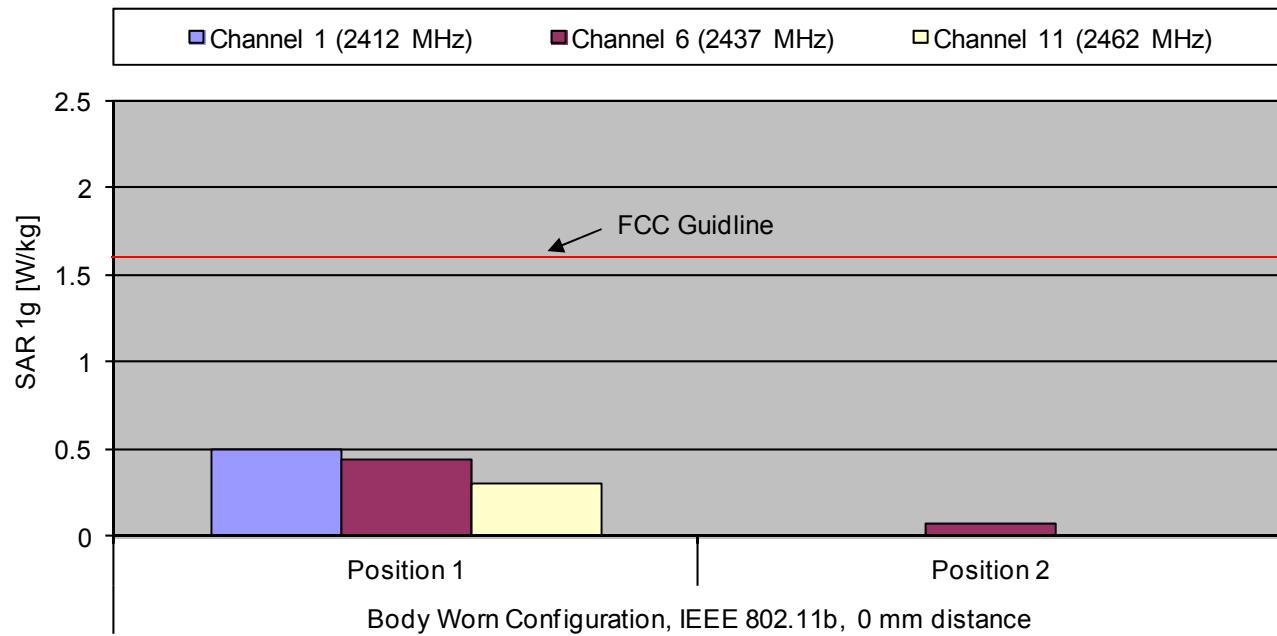


Fig. 4: The reported SAR values for the HumanWare Victor Reader Stream in comparison to the FCC exposure limit.

## 8 Appendix

### 8.1 Administrative Data

Date of Validation: 2450 MHz (IEEE 802.11): February 18, 2013  
 Date of Measurement: February 18, 2013  
 Data Stored: Nemko\_60320\_6130012  
 Contact: IMST GmbH  
 Carl-Friedrich-Gauß-Str. 2  
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 Tel.: +49- 2842-981 378. Fax: +49- 2842-981 399  
 email: vandenbosch@imst.de

### 8.2 Device under Test and Test Conditions

MTE: HumanWare Victor Reader Stream, identical prototype  
 Date of Receipt: January 23, 2013  
 IMEI: Item No. 5  
 FCC ID: XT5503VRC  
 IC: 8670A-503VRC  
 Equipment Class: Portable device  
 Power Class: max output power  
 RF Exposure Environment: General Population/ Uncontrolled  
 Power Supply: Internal battery  
 Antenna Type: integrated  
 Headset: not provided  
 Measured Standards: IEEE 802.11 b: data rate: 1 Mbps  
                           IEEE 802.11 g: data rate: 6 Mbps  
                           IEEE 802.11 n: data rate: 6.5 Mbps  
 Method to establish a call: IEEE 802.11 b/g/n: Test software  
 Modulation: IEEE 802.11 b: DPSK  
                           IEEE 802.11 g: BPSK  
                           IEEE 802.11 n: MCS  
 Used Phantom: SAM Twin Phantom V4.0. as defined by the IEEE SCC-34/SC2 group and delivered by Schmid & Partner Engineering AG

HumanWare Victor Reader Stream	TX Range [MHz]	RX Range [MHz]	Used Channels [low. middle. high]	Used Crest Factor
IEEE 802.11 b/g/n	2412.0 – 2462.0	2412.0 – 2462.0	1, 6, 11	1

Table 10: Used channels and crest factors during the test.

### 8.3 Tissue Recipes

The following recipes are provided in percentage by weight.

2450 MHz, Body:	31.40%	Diethylenglykol-monobutylether
	68.60%	De-Ionized Water

### 8.4 Material Parameters

For the measurement of the following parameters the HP 85070B dielectric probe kit is used representing the open-ended coaxial probe measurement procedure. The measured values should be within  $\pm 5\%$  of the recommended values given by the FCC.

Frequency		$\epsilon_r$	$\sigma$ [S/m]
2450 MHz Body (IEEE 802.11 b/g/n)	Recommended Value	$52.70 \pm 2.63$	$1.95 \pm 0.09$
	Measured Value (Ch. 1)	53.40	1.90
	Measured Value (Ch. 6)	53.60	1.93
	Measured Value (Ch. 11)	53.70	1.97

Table 11: Parameters of the tissue simulating liquid.

### 8.5 Simplified Performance Checking

The simplified performance check was realized using the dipole validation kits. The input power of the dipole antennas were 250 mW and they were placed under the flat part of the SAM phantoms. The target and measured results are listed in the Table 12 - 13 and shown in Fig. 5. The target values were adopted from the calibration certificates.

Available Dipoles		$SAR_{1g}$ [W/kg]	$\epsilon_r$	$\sigma$ [S/m]
D2450V2, SN #709	Target Values Body	13.70	52.70	1.95

Table 12: Dipole target results.

Used Dipoles		$SAR_{1g}$ [W/kg]	$\epsilon_r$	$\sigma$ [S/m]
D2450V2, SN: 709	Measured Values Body	14.10	53.6	1.95

Table 13: Measured dipole validation results.

Test Laboratory: Imst GmbH, DASY Yellow (II); File Name: [180213\\_y\\_3536\\_2450.da4](#)

DUT: Dipole 2450 MHz SN: 709; Type: D2450V2; Serial: D2450V2 - SN:709  
 Program Name: System Performance Check at 2450 MHz

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1  
 Medium parameters used:  $f = 2450$  MHz;  $\sigma = 1.95$  mho/m;  $\epsilon_r = 53.6$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
 Phantom section: Flat Section

DASY4 Configuration:

- Probe: EX3DV4 - SN3536; ConvF(7.55, 7.55, 7.55); Calibrated: 24.09.2012
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn631; Calibrated: 20.09.2012
- Phantom: SAM Glycol 1340; Type: QD 000 P40 CB; Serial: TP-1340
- Measurement SW: DASY4, V4.7 Build 80; Postprocessing SW: SEMCAD, V1.8 Build 186

**d=10mm, Pin=250mW/Area Scan (7x7x1):** Measurement grid: dx=10mm, dy=10mm  
 Maximum value of SAR (measured) = 16.0 mW/g

**d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm  
 Reference Value = 90.5 V/m; Power Drift = -0.001 dB

Peak SAR (extrapolated) = 31.2 W/kg

**SAR(1 g) = 14.1 mW/g; SAR(10 g) = 6.24 mW/g**

Maximum value of SAR (measured) = 15.8 mW/g

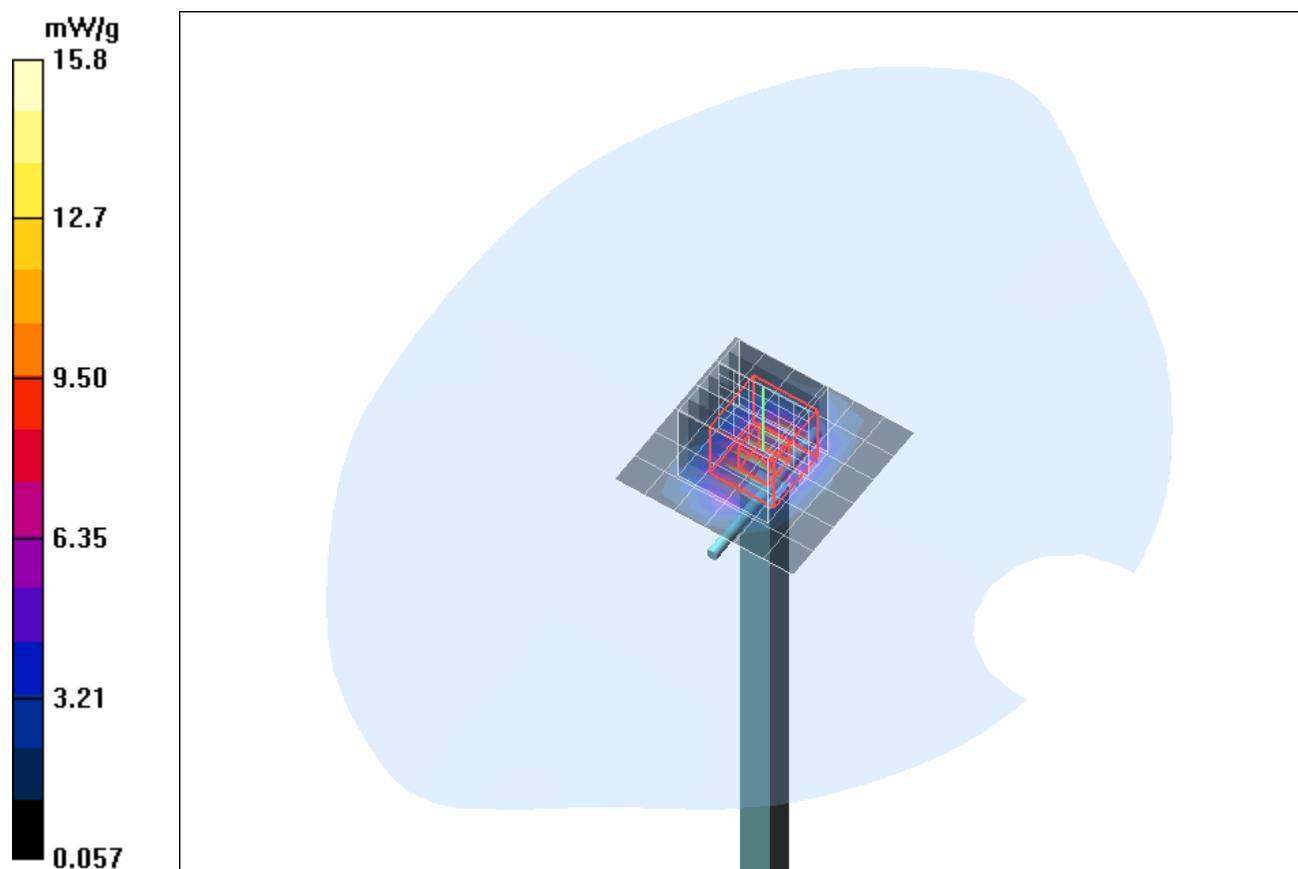


Fig. 5: Validation measurement 2450 MHz Body (February 18, 2013), coarse grid.  
 Ambient Temperature: 22.0°C. Liquid Temperature: 21.4°C.

Error Sources	Uncertainty Value	Probability Distribution	Divisor	$c_i$	Standard Uncertainty	$v_i^2$ or $v_{eff}$
<b>Measurement System</b>						
Probe calibration	$\pm 4.8 \%$	Normal	1	1	$\pm 4.8 \%$	$\infty$
Axial isotropy	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	$\infty$
Hemispherical isotropy	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	$\infty$
Boundary effects	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	$\infty$
Linearity	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	$\infty$
System detection limit	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	$\infty$
Readout electronics	$\pm 1.0 \%$	Normal	1	1	$\pm 1.0 \%$	$\infty$
Response time	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	$\infty$
Integration time	$\pm 0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0 \%$	$\infty$
RF ambient conditions	$\pm 3.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	$\infty$
Probe positioner	$\pm 0.4 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.2 \%$	$\infty$
Probe positioning	$\pm 2.9 \%$	Rectangular	$\sqrt{3}$	1	$\pm 1.7 \%$	$\infty$
Algorithms for max SAR eval.	$\pm 1.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 0.6 \%$	$\infty$
<b>Dipole</b>						
Dipole Axis to Liquid Distance	$\pm 2.0 \%$	Rectangular	1	1	$\pm 1.2 \%$	$\infty$
Input power and SAR drift meas.	$\pm 4.7 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.7 \%$	$\infty$
<b>Phantom and Set-up</b>						
Phantom uncertainty	$\pm 4.0 \%$	Rectangular	$\sqrt{3}$	1	$\pm 2.3 \%$	$\infty$
Liquid conductivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.64	$\pm 1.8 \%$	$\infty$
Liquid conductivity (meas.)	$\pm 2.5 \%$	Normal	1	0.64	$\pm 1.6 \%$	$\infty$
Liquid permittivity (target)	$\pm 5.0 \%$	Rectangular	$\sqrt{3}$	0.6	$\pm 1.7 \%$	$\infty$
Liquid permittivity (meas.)	$\pm 2.5 \%$	Normal	1	0.6	$\pm 1.5 \%$	$\infty$
<b>Combined Uncertainty</b>					$\pm 8.4 \%$	

Table 14: Uncertainty budget for the system performance check.

## 8.6 Environment

To comply with the required noise level (less than 12 mW/kg) periodically measurements without a DUT were conducted. Humidity:  $37\% \pm 5\%$

## 8.7 Test Equipment

Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
<b>DASY4 Systems</b>				
Software Versions DASY4	V4.7	N/A	N/A	N/A
Software Versions SEMCAD	V1.8	N/A	N/A	N/A
Dosimetric E-Field Probe	EX3DV4	3536	09/2012	09/2013
Data Acquisition Electronics	DAE 4	631	09/2012	09/2013
Phantom	SAM	1059	N/A	N/A
Phantom	SAM	1176	N/A	N/A
Phantom	SAM	1340	N/A	N/A
Phantom	SAM	1341	N/A	N/A
<b>Dipoles</b>				
Validation Dipole	D2450V2	709	12/2011	12/2013
<b>Material Measurement</b>				
Network Analyzer	E5071C	MY46103220	08/2011	08/2013
Dielectric Probe Kit	HP85070B	US33020263	N/A	N/A

Table 15: SAR equipment.

Test Equipment	Model	Serial Number	Last Calibration	Next Calibration
<b>Power Meters</b>				
Power Meter. Agilent	E4416A	GB41050414	12/2012	12/2014
Power Meter. Agilent	E4417A	GB41050441	12/2012	12/2014
Power Meter. Anritsu	ML2487A	6K00002319	12/2011	12/2013
Power Meter. Anritsu	ML2488A	6K00002078	12/2011	12/2013
<b>Power Sensors</b>				
Power Sensor. Agilent	E9301H	US40010212	12/2012	12/2014
Power Sensor. Agilent	E9301A	MY41495584	12/2012	12/2014
Power Sensor. Anritsu	MA2481B	031600	12/2011	12/2013
Power Sensor. Anritsu	MA2490A	031565	12/2011	12/2013
<b>RF Sources</b>				
Network Analyzer	E5071C	MY46103220	08/2011	08/2013
Rohde & Schwarz	SME300	100142	N/A	N/A
<b>Amplifiers</b>				
Mini Circuits	ZHL-42	D012296	N/A	N/A
Mini Circuits	ZHL-42	D031104#01	N/A	N/A
Mini Circuits	ZVE-8G	D031004	N/A	N/A
<b>Radio Tester</b>				
Anritsu	MT8815B	6200586536	N/A	N/A

Table 16: Test equipment. General.

## 8.8 Certificates of Conformity

Schmid &amp; Partner Engineering AG

**s p e a g**

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

### Certificate of conformity

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

### References

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

### Conformity

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

### Uncertainty

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

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

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

Date 24.4.2008

Signature / Stamp

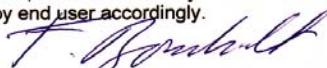


Fig. 6: Certificate of conformity for the used DASY4 system

**Schmid & Partner  
Engineering AG**

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

**Certificate of conformity / First Article Inspection**

Item	SAM Twin Phantom V4.0
Type No	QD 000 P40 BA
Series No	TP-1002 and higher
Manufacturer / Origin	Untersee Composites Hauptstr. 69 CH-8559 Fruthwilen Switzerland

**Tests**

The series production process used allows the limitation to test of first articles. Complete tests were made on the pre-series Type No. QD 000 P40 AA, Serial No. TP-1001 and on the series first article Type No. QD 000 P40 BA, Serial No. TP-1006. Certain parameters have been retested using further series units (called samples).

Test	Requirement	Details	Units tested
Shape	Compliance with the geometry according to the CAD model.	IT'IS CAD File (*)	First article, Samples
Material thickness	Compliant with the requirements according to the standards	2mm +/- 0.2mm in specific areas	First article, Samples
Material parameters	Dielectric parameters for required frequencies	200 MHz – 3 GHz Relative permittivity < 5 Loss tangent < 0.05.	Material sample TP 104-5
Material resistivity	The material has been tested to be compatible with the liquids defined in the standards	Liquid type HSL 1800 and others according to the standard.	Pre-series, First article

**Standards**

- [1] CENELEC EN 50361
- [2] IEEE P1528-200x draft 6.5
- [3] IEC PT 62209 draft 0.9

(\*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of [1] and [3].

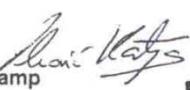
**Conformity**

Based on the sample tests above, we certify that this item is in compliance with the uncertainty requirements of SAR measurements specified in standard [1] and draft standards [2] and [3].

Date

18.11.2001

Signature / Stamp

 **Schmid & Partner**  
**Engineering AG** 

Zeughausstrasse 43, CH-8004 Zurich  
Tel. +41 1 245 97 00, Fax +41 1 245 97 79

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

## 8.9 Pictures of the Device under Test

Fig. 8 - 9 show the device under test.



Fig. 8: Front view of the HumanWare Victor Reader Stream.



Fig. 9: Back view of the HumanWare Victor Reader Stream.

## 8.10 Test Positions for the Device under Test

Fig. 10 - 11 show the test positions for the SAR measurements.



Fig. 10: Body worn configuration, position 1, front towards the phantom.



Fig. 11: Body worn configuration, position 2, front towards the ground.

### 8.11 Pictures to demonstrate the required Liquid Depth

Fig. 12 shows the liquid depth in the used SAM phantom.



Fig. 12: Liquid depth for IEEE 802.11 body worn measurements.

## 9 References

[OET 65] Federal Communications Commission: Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. Supplement C (Edition 01-01) to OET Bulletin 65 (Edition 97-01). FCC. 2001.

[IEEE C95.1-1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields. 3 kHz to 300 GHz. Inst. of Electrical and Electronics Engineers. Inc.. 1999.

[IEEE C95.1-2005] IEEE Std C95.1-2005: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields. 3 kHz to 300 GHz. Inst. of Electrical and Electronics Engineers. Inc.. 2005.

[ICNIRP 1998] ICNIRP: Guidelines for Limiting Exposure to Time-varying Electric. Magnetic. and Electromagnetic Fields (up to 300 GHz). In: Health Physics. Vol. 74. No. 4. 494-522. 1998.

[IEEE 1528-2003] IEEE Std 1528-2003: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques. 1528-2003. December 19. 2003. The Institute of Electrical and Electronics Engineers.

[NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results. Technical Note 1297 (TN1297). United States Department of Commerce Technology Administration. National Institute of Standards and Technology. 1994.

[DASY4] Schmid & Partner Engineering AG: DASY4 Manual. April 2008

[FCC 96-326] FCC 96-326. ET Docket No. 93-62. Report and Order. August 1. 1996

[3GPP 34.121] ETSI TS 134 121-1 V7.4.0. Universal Mobile Telecommunications System (UMTS) ; User Equipment (UE) conformance specification; Radio transmission and reception (FDD)

[KDB 447498] 447498 D01 Mobile Portable RF Exposure v04: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies. 11/13/2009

[IC RSS 102] Industry Canada, Radio Standards Specification, Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands); RSS-102 Issue 4 March 2010