

## **CERTIFICATE OF COMPLIANCE** **SAR EVALUATION**

### **Test Lab:**

**CELLTECH RESEARCH INC.**  
Testing and Engineering Lab  
1955 Moss Court  
Kelowna, B.C.  
Canada V1Y 9L3  
Phone: 250 - 860-3130  
Fax: 250 - 860-3110  
Toll Free: 1-877-545-6287  
e-mail: info@celltechlabs.com  
web site: www.celltechlabs.com

### **Applicant Information:**

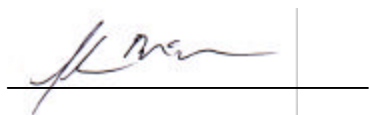
**NOVATEL WIRELESS INC.**  
9360 Towne Centre Dr., Suite 110  
San Diego, CA 92121

|                                  |                                                                                     |
|----------------------------------|-------------------------------------------------------------------------------------|
| <b>FCC ID:</b>                   | <b>PKRNVWC201</b>                                                                   |
| <b>Model(s):</b>                 | <b>NVW-C201</b>                                                                     |
| <b>Equipment Type:</b>           | <b>PCS CDMA Wireless Modem Card<br/>(installed in PCMCIA Slot of Laptop PC)</b>     |
| <b>Equipment Classification:</b> | <b>Licensed Base Station for Part 24 (PCB)</b>                                      |
| <b>Modulation:</b>               | <b>PCS CDMA</b>                                                                     |
| <b>Tx Frequency Range:</b>       | <b>1850 - 1910 MHz</b>                                                              |
| <b>Conducted Power Tested:</b>   | <b>24.7 dBm (1851.25 MHz)<br/>24.5 dBm (1880.00 MHz)<br/>24.1 dBm (1908.75 MHz)</b> |
| <b>FCC Rule Part(s):</b>         | <b>15.247, 2.1093; ET Docket 96.326</b>                                             |
| <b>IC Rule Part(s):</b>          | <b>RSS-102 Issue 1</b>                                                              |

This wireless mobile and/or portable device has been shown to be compliant for localized Specific Absorption Rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and has been tested in accordance with the measurement procedures specified in ANSI/IEEE Std. C95.3-1999.

I attest to the accuracy of data. All measurements 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.

Celltech Research Inc. certifies that no party to this application has been denied FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).



**Shawn McMillen**  
**General Manager**  
**Celltech Research Inc.**



## **TABLE OF CONTENTS**

|      |                                              |    |
|------|----------------------------------------------|----|
| 1.0  | INTRODUCTION.....                            | 1  |
| 2.0  | DESCRIPTION OF EUT.....                      | 1  |
| 3.0  | SAR MEASUREMENT SYSTEM .....                 | 2  |
| 4.0  | MEASUREMENT SUMMARY.....                     | 3  |
| 5.0  | DETAILS OF SAR EVALUATION.....               | 4  |
| 6.0  | EVALUATION PROCEDURES.....                   | 4  |
| 7.0  | SYSTEM VALIDATION.....                       | 5  |
| 8.0  | SIMULATED EQUIVALENT TISSUES.....            | 5  |
| 9.0  | TISSUE PARAMETERS.....                       | 5  |
| 10.0 | SYSTEM SPECIFICATIONS.....                   | 6  |
| 11.0 | PROBE SPECIFICATION.....                     | 7  |
| 12.0 | GENERIC TWIN PHANTOM.....                    | 7  |
| 13.0 | DEVICE HOLDER.....                           | 7  |
| 14.0 | TEST EQUIPMENT LIST.....                     | 8  |
| 15.0 | MEASUREMENT UNCERTAINTIES.....               | 9  |
| 16.0 | SAR LIMITS.....                              | 10 |
| 17.0 | REFERENCES.....                              | 10 |
|      | APPENDIX A - SAR MEASUREMENT DATA.....       | 11 |
|      | APPENDIX B - DIPOLE VALIDATION.....          | 12 |
|      | APPENDIX C - PROBE CALIBRATION.....          | 13 |
|      | APPENDIX D - SAR TEST SETUP PHOTOGRAPHS..... | 14 |

## 1.0 INTRODUCTION

This measurement report shows compliance of the NOVATEL WIRELESS INC. PCS CDMA Wireless Modem Card FCC ID: PKRNVWC201 (installed in PCMCIA Slot of Laptop PC) with FCC Part 2.1093, ET Docket 96-326 Rules for mobile and portable devices. The test procedures, as described in American National Standards Institute C95.1-1992 (1), FCC OET Bulletin 65, Supplement C (Edition 01-01), and RSS-102 Issue 1 of Industry Canada were employed. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the evaluation, equipment used, and the various provisions of the rules are included within this test report.

## 2.0 DESCRIPTION of Equipment Under Test (EUT)

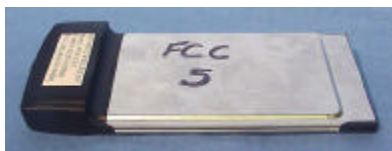
|                                 |                                                                    |                                  |                                                                         |
|---------------------------------|--------------------------------------------------------------------|----------------------------------|-------------------------------------------------------------------------|
| <b>EUT Type</b>                 | PCS CDMA Wireless Modem Card installed in PCMCIA Slot of Laptop PC | <b>Model No.(s)</b>              | NVW-C201                                                                |
| <b>Equipment Class</b>          | Licensed Base Station for Part 24 (PCB)                            | <b>S/N No.</b>                   | Pre-production                                                          |
| <b>Modulation</b>               | PCS CDMA                                                           | <b>RF Conducted Power Tested</b> | 24.7 dBm (1851.25MHz)<br>24.5 dBm (1880.00MHz)<br>24.1 dBm (1908.75MHz) |
| <b>FCC Rule Part(s)</b>         | 2.1093;<br>ET Docket 96.326                                        | <b>Antenna Type</b>              | Internal                                                                |
| <b>Tx Frequency Range (MHz)</b> | 1851.25 - 1908.75                                                  | <b>Power Supply</b>              | From host PC                                                            |



Front of EUT



Left Side of EUT



Right Side of EUT



Back of EUT



EUT installed in Laptop PC

### 3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, and the generic twin phantom containing brain or muscle 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). A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronics (DAE) circuit performs the signal amplification, signal multiplexing, AD-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 of the DAE and transfers data to the PC plug-in card. The DAE3 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, 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.



DASY3 SAR Measurement System  
with Generic Twin Phantom

#### 4.0 MEASUREMENT SUMMARY

The measurement results were obtained with the EUT tested in the conditions described in this report. Detailed measurement data and plots showing the maximum SAR location of the EUT are reported in Appendix A.

#### Body SAR Measurement Results

| Freq.<br>(MHz)                                                                   | Channel | Mode<br>Tested | Conducted<br>Power<br>(dBm)                                                                                                                            | Phantom<br>Section | Separation<br>Distance<br>(cm) | SAR<br>(w/kg)<br>1 gram average              |                                                 |
|----------------------------------------------------------------------------------|---------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------------|----------------------------------------------|-------------------------------------------------|
|                                                                                  |         |                |                                                                                                                                                        |                    |                                | Measured SAR<br>values with<br>3.2mm phantom | Extrapolated<br>SAR values for<br>2.0mm phantom |
| 1851.25                                                                          | 0025    | PCS<br>CDMA    | 24.7                                                                                                                                                   | Flat               | 1.5                            | 1.03                                         | 1.15                                            |
| 1880.00                                                                          | 0600    | PCS<br>CDMA    | 24.5                                                                                                                                                   | Flat               | 1.5                            | 1.05                                         | 1.18                                            |
| 1908.75                                                                          | 1175    | PCS<br>CDMA    | 24.1                                                                                                                                                   | Flat               | 1.5                            | 0.503                                        | 0.563                                           |
| <b>Mixture Type: Muscle<br/>Dielectric Constant: 54.6<br/>Conductivity: 1.39</b> |         |                | <b>ANSI / IEEE C95.1 1992 - SAFETY LIMIT<br/>Spatial Peak Uncontrolled Exposure / General Population<br/>Body SAR: 1.6 W/kg (averaged over 1 gram)</b> |                    |                                |                                              |                                                 |

#### Notes:

1. The actual thickness of the flat phantom shell as reported by the system manufacturer was 3.2mm instead of the required 2.0mm thickness (see Appendix B). As a result of the increased thickness the measured SAR values were 12% lower than expected. The final SAR values were extrapolated from the measured SAR values and calculated for a 2.0mm flat phantom shell thickness.
2. The SAR levels found were below the maximum limit of 1.6 w/kg. The highest reported SAR value was 1.05 w/kg (based on 2.0 mm phantom thickness).
3. The EUT was tested for body SAR at a 1.5 cm separation distance from the outer surface of the planar phantom.
4. Ambient TEMPERATURE: 22.4 °C  
Relative HUMIDITY: 56.3 %  
Atmospheric PRESSURE: 95.1 kPa



Body SAR Test Setup  
1.5cm Separation Distance

## **5.0 DETAILS OF SAR EVALUATION**

The NOVATEL WIRELESS INC. PCS CDMA Wireless Modem Card FCC ID: PKRNVWC201 (installed in PCMCIA Slot of Laptop PC) was found to be compliant for localized Specific Absorption Rate (SAR) based on the following test provisions and conditions:

1. The EUT was evaluated for body SAR with the external end of the device (antenna) placed parallel to, and at 1.5 cm separation distance from, the outer surface of the planar phantom.
2. SAR measurements were evaluated at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimize drift.
3. The conducted power level was checked before and after each test.
4. The conducted power was measured according to the procedures described in FCC Part 2.1046.
5. The device operated continuously in the transmit mode for the duration of the test.
6. The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the device and its antenna.
7. The EUT was tested with a fully charged battery.

## **6.0 EVALUATION PROCEDURES**

The Specific Absorption Rate (SAR) evaluation was performed in the following manner:

- a. (i) The evaluation was performed in an applicable area of the phantom depending on the type of device being tested. For devices held to the ear during normal operation, both the left and right ear positions were evaluated. The positioning of the ear-held device relative to the phantom was in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01).
- (ii) For face-held and body-worn devices, or devices which can be operated within 20cm of the body, the planar section of the phantom was used. The type of device being evaluated determined the distance of the EUT to the outer surface of the planar phantom.
- b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.
- c. For frequencies below 500MHz a 4x4x7 matrix was performed around the greatest spatial SAR distribution found during the area scan of the applicable exposed region. For frequencies above 500MHz a 5x5x7 matrix was performed. SAR values were then calculated using a 3-D spline interpolation algorithm and averaged over spatial volumes of 1 and 10 grams.
- d. If the EUT had any appreciable drift over the course of the evaluation, then the EUT was re-evaluated. Any unusual anomalies over the course of the test also warranted a re-evaluation.

## 7.0 SYSTEM VALIDATION

Prior to the assessment, the system was verified in the planar region of the phantom. A forward power of 250mW was applied to the 1800MHz dipole and the system was verified to a tolerance of  $\pm 10\%$ . The applicable verification(s) is/are as follows (see Appendix B for validation test plot and explanation of phantom thickness):

| Dipole Validation Kit | Target SAR 1g (w/kg)                |                                           | Measured SAR 1g (w/kg) |
|-----------------------|-------------------------------------|-------------------------------------------|------------------------|
|                       | Target SAR value with 2.0mm phantom | Extrapolated SAR value with 3.2mm phantom |                        |
| D1800V2               | 9.66                                | 8.63                                      | 8.38                   |

## 8.0 SIMULATED TISSUES

The 1800MHz muscle mixture consists of Glycol-monobutyl, water, and salt. The fluid was prepared according to standardized procedures, and measured for dielectric parameters (permittivity and conductivity). Prior to the evaluation the dipole validation was performed with 1800MHz brain mixture.

| INGREDIENT       | MIXTURE (%)<br>1800MHz<br>Muscle | MIXTURE (%)<br>1800MHz Brain<br>(Validation) |
|------------------|----------------------------------|----------------------------------------------|
| Water            | 69.91                            | 54.90                                        |
| Glycol Monobutyl | 29.96                            | 44.92                                        |
| Salt             | 0.13                             | 0.18                                         |

## 9.0 TISSUE PARAMETERS

The dielectric parameters of the fluids were verified prior to the SAR evaluation using an 85070C Dielectric Probe Kit and an 8753E Network Analyzer. The dielectric parameters of the fluid are as follows:

| Frequency            | Equivalent Tissue | Dielectric Constant $\epsilon_r$ | Conductivity $s$ (mho/m) | $\rho$ (Kg/m <sup>3</sup> ) |
|----------------------|-------------------|----------------------------------|--------------------------|-----------------------------|
| 1800MHz              | Muscle            | $54.6 \pm 5\%$                   | $1.39 \pm 5\%$           | 1000                        |
| 1800MHz (Validation) | Brain             | $40.5 \pm 5\%$                   | $1.35 \pm 5\%$           | 1000                        |

## **10.0 ROBOT SYSTEM SPECIFICATIONS**

### **Specifications**

**POSITIONER:** Stäubli Unimation Corp. Robot Model: RX60L  
**Repeatability:** 0.02 mm  
**No. of axis:** 6

### **Data Acquisition Electronic (DAE) System**

#### **Cell Controller**

**Processor:** Pentium III  
**Clock Speed:** 450 MHz  
**Operating System:** Windows NT  
**Data Card:** DASY3 PC-Board

#### **Data Converter**

**Features:** Signal Amplifier, multiplexer, A/D converter, and control logic  
**Software:** DASY3 software  
**Connecting Lines:** Optical downlink for data and status info.  
Optical uplink for commands and clock

### **PC Interface Card**

**Function:** 24 bit (64 MHz) DSP for real time processing  
Link to DAE3  
16 bit A/D converter for surface detection system  
serial link to robot  
direct emergency stop output for robot

### **E-Field Probe**

**Model:** ET3DV6  
**Serial No.:** 1590  
**Construction:** Triangular core fiber optic detection system  
**Frequency:** 10 MHz to 6 GHz  
**Linearity:**  $\pm 0.2$  dB (30 MHz to 3 GHz)

### **Phantom**

**Phantom:** Generic Twin  
**Shell Material:** Fiberglass  
**Thickness:** Left/Right Head -  $2.0 \pm 0.1$  mm  
Planar Phantom -  $3.2 \pm 0.1$  mm

### 11.0 PROBE SPECIFICATION (ET3DV6)

Construction: Symmetrical design with triangular core  
Built-in shielding against static charges  
PEEK enclosure material (resistant to organic solvents, e.g. glycol)

Calibration: In air from 10 MHz to 2.5 GHz  
In brain simulating tissue at frequencies of 900 MHz  
and 1.8 GHz (accuracy  $\pm 8\%$ )

Frequency: 10 MHz to  $> 6$  GHz; Linearity:  $\pm 0.2$  dB  
(30 MHz to 3 GHz)

Directivity:  $\pm 0.2$  dB in brain tissue (rotation around probe axis)  
 $\pm 0.4$  dB in brain tissue (rotation normal to probe axis)

Dynam. Rnge:  $5 \mu\text{W/g}$  to  $> 100 \text{ mW/g}$ ; Linearity:  $\pm 0.2$  dB

Srfce. Detect.  $\pm 0.2$  mm repeatability in air and clear liquids over  
diffuse reflecting surfaces

Dimensions: Overall length: 330 mm  
Tip length: 16 mm  
Body diameter: 12 mm  
Tip diameter: 6.8 mm  
Distance from probe tip to dipole centers: 2.7 mm

Application: General dosimetry up to 3 GHz  
Compliance tests of mobile phone



ET3DV6 E-Field Probe

### 12.0 GENERIC TWIN PHANTOM

The generic twin phantom is a fiberglass shell phantom with a 2.0mm left and right head shell thickness and a 3.2mm flat planar area. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.



Generic Twin Phantom

### 13.0 DEVICE HOLDER

The DASY3 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of  $65^\circ$ .



Device Holder

#### 14.0 TEST EQUIPMENT LIST

| SAR MEASUREMENT SYSTEM                                                                                                                                                               |                                                      |                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------------------------|
| <u>EQUIPMENT</u>                                                                                                                                                                     | <u>SERIAL NO.</u>                                    | <u>CALIBRATION DATE</u>                                                   |
| <b>DASY3 System</b><br>-Robot<br>-ET3DV6 E-Field Probe<br>-DAE<br>-835MHz Validation Dipole<br>-900MHz Validation Dipole<br>-1800MHz Validation Dipole<br>-Generic Twin Phantom V3.0 | 599396-01<br>1590<br>383<br>411<br>054<br>247<br>N/A | N/A<br>Mar 2001<br>Sept 1999<br>Aug 1999<br>June 2001<br>June 2001<br>N/A |
| <b>85070C Dielectric Probe Kit</b>                                                                                                                                                   | N/A                                                  | N/A                                                                       |
| <b>Gigatronics 8652A Power Meter</b><br>-Power Sensor 80701A<br>-Power Sensor 80701A                                                                                                 | 1835272<br>1833535<br>1833542                        | Oct 1999<br>Oct 1999<br>Oct 1999                                          |
| <b>E4408B Spectrum Analyzer</b>                                                                                                                                                      | US39240170                                           | Nov 1999                                                                  |
| <b>8594E Spectrum Analyzer</b>                                                                                                                                                       | 3543A02721                                           | Mar 2000                                                                  |
| <b>8753E Network Analyzer</b>                                                                                                                                                        | US38433013                                           | Nov 1999                                                                  |
| <b>8648D Signal Generator</b>                                                                                                                                                        | 3847A00611                                           | N/A                                                                       |
| <b>5S1G4 Amplifier Research Power Amplifier</b>                                                                                                                                      | 26235                                                | N/A                                                                       |

## 15.0 MEASUREMENT UNCERTAINTIES

| Uncertainty Description                        | Error        | Distribution | Weight | Standard Deviation | Offset    |
|------------------------------------------------|--------------|--------------|--------|--------------------|-----------|
| <b>Probe Uncertainty</b>                       |              |              |        |                    |           |
| Axial isotropy                                 | $\pm 0.2$ dB | U-Shaped     | 0.5    | $\pm 2.4$ %        |           |
| Spherical isotropy                             | $\pm 0.4$ dB | U-Shaped     | 0.5    | $\pm 4.8$ %        |           |
| Isotropy from gradient                         | $\pm 0.5$ dB | U-Shaped     | 0      | $\pm$              |           |
| Spatial resolution                             | $\pm 0.5$ %  | Normal       | 1      | $\pm 0.5$ %        |           |
| Linearity error                                | $\pm 0.2$ dB | Rectangle    | 1      | $\pm 2.7$ %        |           |
| Calibration error                              | $\pm 3.3$ %  | Normal       | 1      | $\pm 3.3$ %        |           |
| <b>SAR Evaluation Uncertainty</b>              |              |              |        |                    |           |
| Data acquisition error                         | $\pm 1$ %    | Rectangle    | 1      | $\pm 0.6$ %        |           |
| ELF and RF disturbances                        | $\pm 0.25$ % | Normal       | 1      | $\pm 0.25$ %       |           |
| Conductivity assessment                        | $\pm 5$ %    | Rectangle    | 1      | $\pm 5.8$ %        |           |
| <b>Spatial Peak SAR Evaluation Uncertainty</b> |              |              |        |                    |           |
| Extrapolated boundary effect                   | $\pm 3$ %    | Normal       | 1      | $\pm 3$ %          | $\pm 5$ % |
| Probe positioning error                        | $\pm 0.1$ mm | Normal       | 1      | $\pm 1$ %          |           |
| Integrated and cube orientation                | $\pm 3$ %    | Normal       | 1      | $\pm 3$ %          |           |
| Cube Shape inaccuracies                        | $\pm 2$ %    | Rectangle    | 1      | $\pm 1.2$ %        |           |
| Device positioning                             | $\pm 6$ %    | Normal       | 1      | $\pm 6$ %          |           |
| <b>Combined Uncertainties</b>                  |              |              |        | $\pm 11.7$ %       | $\pm 5$ % |

Measurement uncertainties in SAR measurements are difficult to quantify due to several variables including biological, physiological, and environmental. However, the estimated measurement uncertainties in SAR are less than 15-25 %.

According to ANSI/IEEE C95.3, the overall uncertainties are difficult to assess and will vary with the type of meter and usage situation. However, accuracy's of  $\pm 1$  to 3 dB can be expected in practice, with greater uncertainties in near-field situations and at higher frequencies (shorter wavelengths), or areas where large reflecting objects are present. Under optimum measurement conditions, SAR measurement uncertainties of at least  $\pm 2$  dB can be expected.

According to CENELEC, typical worst-case uncertainty of field measurements is  $\pm 5$  dB. For well-defined modulation characteristics the uncertainty can be reduced to  $\pm 3$  dB.

## 16.0 SAR SAFETY LIMITS

| <b>EXPOSURE LIMITS</b><br>(General Population / Uncontrolled Exposure Environment) | <b>SAR</b><br>(W/Kg) |
|------------------------------------------------------------------------------------|----------------------|
| Spatial Average (averaged over the whole body)                                     | 0.08                 |
| Spatial Peak (averaged over any 1g of tissue)                                      | 1.60                 |
| Spatial Peak (hands/wrists/feet/ankles averaged over 10g)                          | 4.00                 |

Notes: 1. The FCC SAR safety limits specified in the table above apply to devices operated in the General Population / Uncontrolled Exposure environment.  
2. Uncontrolled environments are defined as locations where there is exposure of individuals who have no knowledge or control of their exposure.

## 17.0 REFERENCES

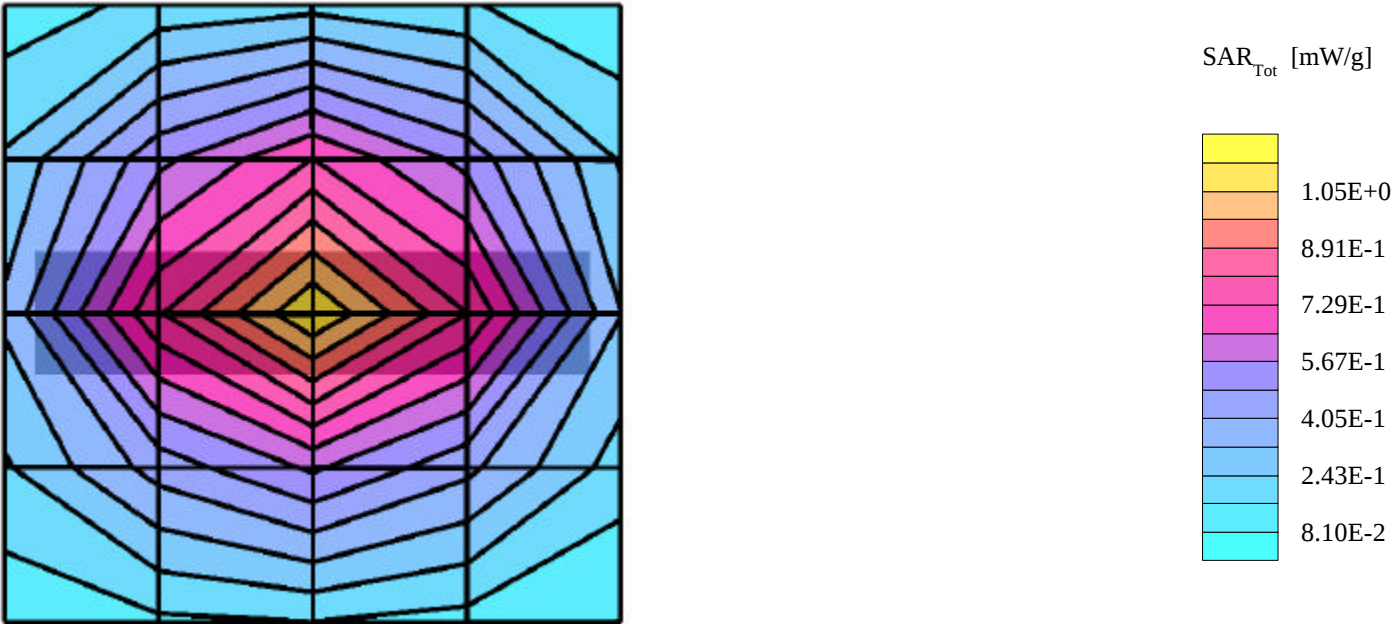
- (1) ANSI, *ANSI/IEEE C95.1: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 Ghz*, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992;
- (2) Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997;
- (3) Thomas Schmid, Oliver Egger, and Neils Kuster, "Automated E-field scanning system for dosimetric assessments", *IEEE Transaction on Microwave Theory and Techniques*, Vol. 44, pp. 105-113, January, 1996.
- (4) Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetric evaluation of mobile communications equipment with know precision", *IEICE Transactions of Communications*, vol. E80-B, no. 5, pp. 645 – 652, May 1997.

## ***APPENDIX A - SAR MEASUREMENT DATA***

Novatel Wireless Inc. FCC ID: PKRNVWC201

Generic Twin Phantom; Flat Section; Position: (90°,180°)  
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0  
1800MHz Muscle:  $\sigma = 1.39 \text{ mho/m}$   $\epsilon_r = 54.6$   $\rho = 1.00 \text{ g/cm}^3$   
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0  
Cube 5x5x7  
SAR (1g): 1.03 mW/g, SAR (10g): 0.622 mW/g

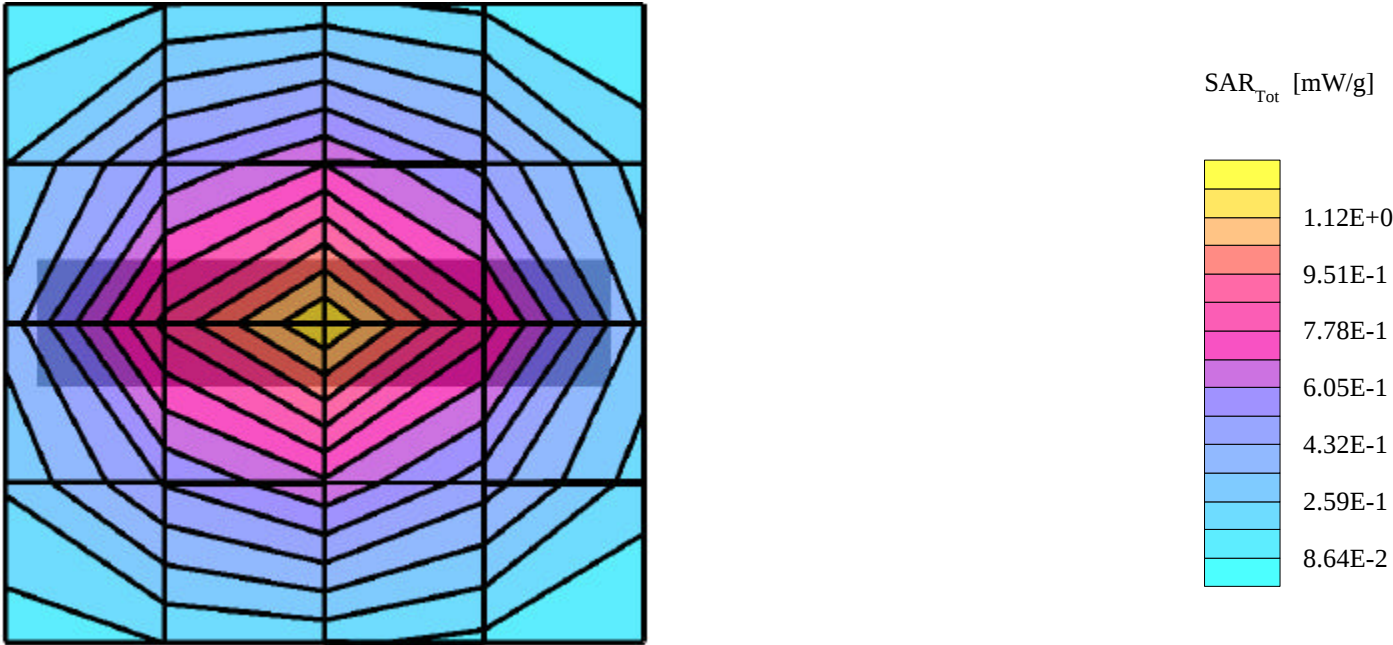
Body SAR at 1.5cm Separation Distance  
Novatel Model: NVW-C201  
Wireless Modem Card  
PCS CDMA Mode  
Channel 0025 [1851.25 MHz]  
Conducted Power: 24.7 dBm  
Date Tested: August 20, 2001



Novatel Wireless Inc. FCC ID: PKRNVWC201

Generic Twin Phantom; Flat Section; Position: (90°,180°)  
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0  
1800MHz Muscle:  $\sigma = 1.39 \text{ mho/m}$   $\epsilon_r = 54.6$   $\rho = 1.00 \text{ g/cm}^3$   
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0  
Cube 5x5x7  
SAR (1g): 1.05 mW/g, SAR (10g): 0.629 mW/g

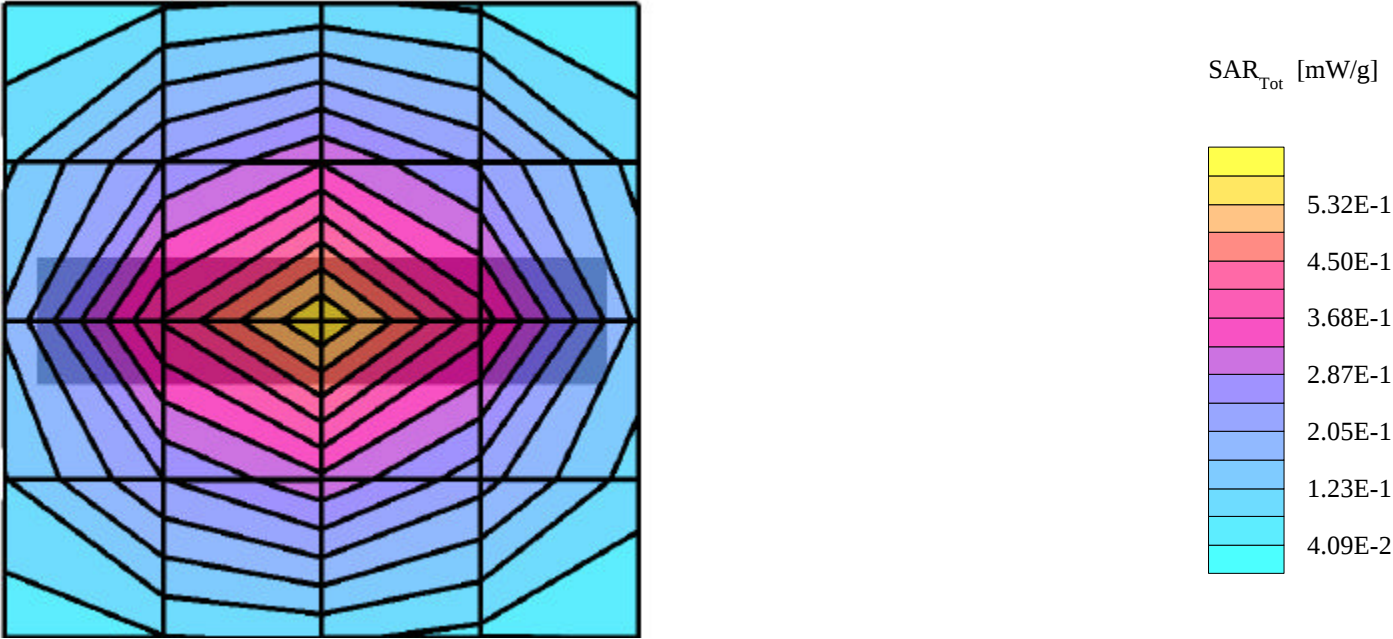
Body SAR at 1.5cm Separation Distance  
Novatel Model: NVW-C201  
Wireless Modem Card  
PCS CDMA Mode  
Channel 0600 [1880.00 MHz]  
Conducted Power: 24.5 dBm  
Date Tested: August 20, 2001



Novatel Wireless Inc. FCC ID: PKRNVWC201

Generic Twin Phantom; Flat Section; Position: (90°,180°)  
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0  
1800MHz Muscle:  $\sigma = 1.39 \text{ mho/m}$   $\epsilon_r = 54.6$   $\rho = 1.00 \text{ g/cm}^3$   
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0  
Cube 5x5x7  
SAR (1g): 0.503 mW/g, SAR (10g): 0.299 mW/g

Body SAR at 1.5cm Separation Distance  
Novatel Model: NVW-C201  
Wireless Modem Card  
PCS CDMA Mode  
Channel 1175 [1908.75 MHz]  
Conducted Power: 24.1 dBm  
Date Tested: August 20, 2001



## ***APPENDIX B - DIPOLE VALIDATION***

The manufacturer of the DASY3 generic twin phantom has determined that the planar section used during system validations and body SAR RF exposure evaluations is 3.2mm, as opposed to the 2.0mm required thickness (OET Bulletin 65, Supplement C, Edition 01-01). As a result of this increased thickness, both the system validation and body SAR measurements reported a 12% lower assessed value. Attached is the notice from the device manufacturer regarding the change in procedure of dipole calibration due to the increased shell thickness of the generic twin phantom. Also attached from the device manufacturer is the summary of validation dipole target numbers for the increased phantom shell thickness.

# MC0300: Change in Procedure of Dipole Calibration

## Procedure Before February 2000

The distance between the dipole axis and head tissue simulating liquid was based on the specifications given by the vendor manufacturing the generic twin phantom. The specifications for the shell thickness were  $2 \pm 0.2$  mm at the location where the phone touches the head as well as at the location of dipole validation in the flat phantom area. The thickness of the first phantom was carefully verified using the robot, which is a very tedious and time consuming procedure. Afterward, Schmid & Partner Engineering AG (SPEAG) relied on the manufacturer's specifications, since suitable equipment for routine validation of the shell thickness was not available before January 2000.

## Rationale for Change of Procedure

During the course of closing the remaining gaps of quality control of our products and production, SPEAG purchased the hall effect wall thickness gauge MINITEST FH4100 of ElektroPhysik in January 2000. This instrumentation enables measurement of the shell thickness with a precision of better than  $\pm 0.1$  mm. Verification of the phantoms revealed that the production variability in the regions of validation is considerably larger, i.e., about  $2.8 \pm 0.4$  mm, which is due to an unnotified change in the production method of the vendor. The mean and deviation were estimated thereafter based on a limited number of samples.

The thickness of the phantom used for dipole calibration has a thickness of  $3.2 \pm 0.1$  mm. In other words, the distances between the dipole axis and the liquid were 16.2 mm and not 15 mm below 1 GHz and 11.2 instead of 10 mm above 1 GHz. Therefore, an incorrect distance is stated in all calibration documents issued before February 2000. This does not effect laboratories using the generic twin phantom, only those groups which use other phantoms.

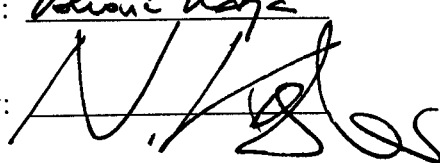
## Changes in Procedure (effective February 2000)

- 1) Rigorous quality control of the new phantoms and conduct of the calibration at the correct distances of 15 mm and 10 mm respectively.
- 2) Provision of the corrected calibration distance as well as of extrapolated values for the distances 15, 15.5 and 16 mm for customers using phantoms other than the generic twin phantom. The latter are extrapolated values based on a series of measurements conducted with different dipoles which therefore have slightly enhanced uncertainties.

Suggested on: 15. 04. 2000

by: Philip Kojic

Approved on: 16. 04. 2000

by: 

# Schmid & Partner Engineering AG

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

## D1800V2 – SN:247 Summary of Dipole Data (June 20, 2001)

### SAR Measurement

In the Table 1 averaged measured and extrapolated SAR values are normalized to a dipole input power of 1W (forward power). The dipole was position below the flat phantom filled with head-tissue simulating liquid ( $\epsilon=40.0$ ,  $\sigma=1.36$ ).

| Distance (mm)     | SAR (1g) mW/g | SAR (10g) mW/g | Validation Repeatability (Standard deviation) | Method            |
|-------------------|---------------|----------------|-----------------------------------------------|-------------------|
| <b>10.0</b>       | <b>38.7</b>   | <b>20.1</b>    | <b><math>\pm 4\%</math></b>                   | <b>Calibrated</b> |
| 10.5              | 36.8          | 19.3           | $\pm 5\%$                                     | Extrapolated      |
| 11.0              | 35.1          | 18.6           | $\pm 5\%$                                     | Extrapolated      |
| 11.2 <sup>1</sup> | 34.5          | 18.3           | $\pm 5\%$                                     | Extrapolated      |

In the Table 2 averaged measured and extrapolated SAR values are normalized to a dipole input power of 1W (forward power). The dipole was position below the flat phantom filled with head-tissue simulating liquid ( $\epsilon=40.1$ ,  $\sigma=1.71$ ).

| Distance (mm)     | SAR (1g) mW/g | SAR (10g) mW/g | Validation Repeatability (Standard deviation) | Method            |
|-------------------|---------------|----------------|-----------------------------------------------|-------------------|
| <b>10.0</b>       | <b>43.6</b>   | <b>21.6</b>    | <b><math>\pm 4\%</math></b>                   | <b>Calibrated</b> |
| 10.5              | 41.5          | 20.8           | $\pm 5\%$                                     | Extrapolated      |
| 11.0              | 39.6          | 20.1           | $\pm 5\%$                                     | Extrapolated      |
| 11.2 <sup>1</sup> | 38.9          | 19.8           | $\pm 5\%$                                     | Extrapolated      |

### Dipole Impedance and Return Loss

The transformation parameters from the SMA-connector to the dipole feedpoint are:

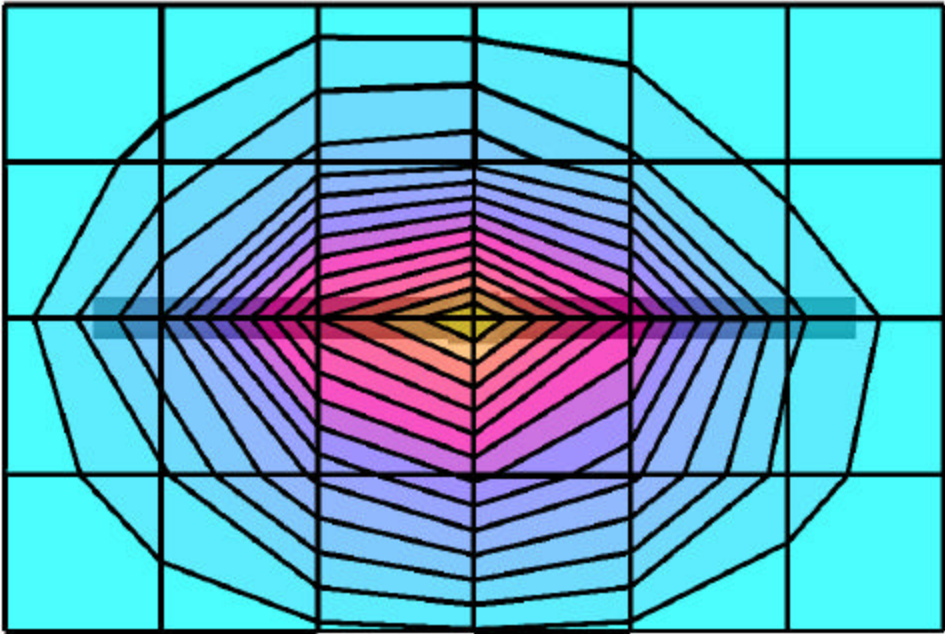
Electrical delay: **1.208 ns** (one direction)  
Transmission factor: **0.995** (voltage transmission, one direction)

<sup>1</sup> As explained in the document "MC0300: Change in Procedure of Dipole Calibration" of April 15<sup>th</sup>, 2000, the distance between the dipole axis and liquid was 1.2 mm more than stated in the original documents issued before February 2000. The extrapolated values and the given uncertainties have been carefully evaluated and have been validated by measurements and computations.

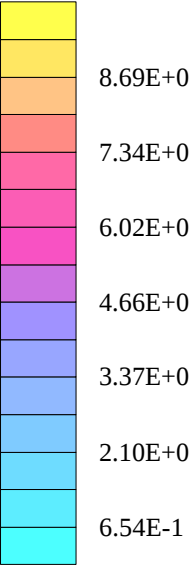
Dipole 1800MHz

Generic Twin Phantom; Flat Section; Position: (90°,90°)  
Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 1.0  
1800MHz Brain:  $\sigma = 1.35 \text{ mho/m}$   $\epsilon_r = 40.5$   $\rho = 1.00 \text{ g/cm}^3$   
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0  
Cubes (2), measured power: 250 mW  
SAR (1g): 8.38 mW/g  $\pm 0.04 \text{ dB}$ , SAR (10g): 4.54 mW/g  $\pm 0.03 \text{ dB}$

Test Date: August 20, 2001



SAR<sub>Tot</sub> [mW/g]



## Validation Dipole D1800V2 SN:247, d = 10 mm

Frequency: 1800 MHz; Antenna Input Power: 250 [mW]

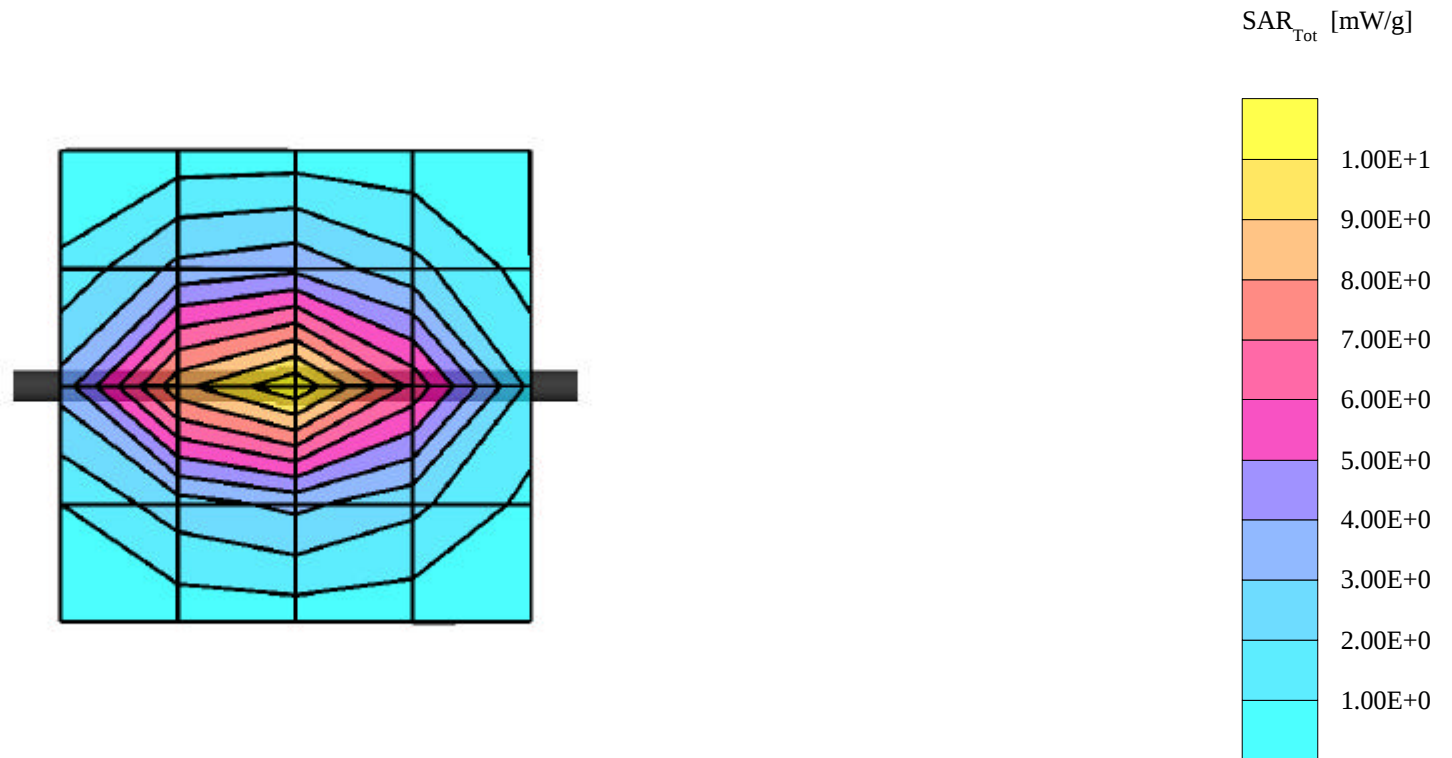
Generic Twin Phantom; Flat Section; Grid Spacing: Dx = 15.0, Dy = 15.0, Dz = 10.0

Probe: ET3DV6 - SN1507; ConvF(5.57,5.57,5.57); Crest factor: 1.0; IEEE1528 1800 MHz :  $\sigma = 1.36$  mho/m  $\epsilon_r = 40.0$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): Peak: 18.2 mW/g  $\pm 0.04$  dB, SAR (1g): 9.66 mW/g  $\pm 0.03$  dB, SAR (10g): 5.02 mW/g  $\pm 0.03$  dB, (Worst-case extrapolation)

Penetration depth: 8.2 (7.6, 9.4) [mm]

Powerdrift: -0.01 dB



## ***APPENDIX C - PROBE CALIBRATION***

# Probe ET3DV6

## SN:1590

|               |                |
|---------------|----------------|
| Manufactured: | March 19, 2001 |
| Calibrated:   | March 26, 2001 |

Calibrated for System DASY3

**DASY3 - Parameters of Probe: ET3DV6 SN:1590**

## Sensitivity in Free Space

## Diode Compression

|       |                                                 |       |               |
|-------|-------------------------------------------------|-------|---------------|
| NormX | <b>1.77</b> $\mu\text{V}/(\text{V}/\text{m})^2$ | DCP X | <b>100</b> mV |
| NormY | <b>1.91</b> $\mu\text{V}/(\text{V}/\text{m})^2$ | DCP Y | <b>100</b> mV |
| NormZ | <b>1.67</b> $\mu\text{V}/(\text{V}/\text{m})^2$ | DCP Z | <b>100</b> mV |

## Sensitivity in Tissue Simulating Liquid

**Head**                      **450 MHz**                       $\epsilon_r = 43.5 \pm 5\%$                        $s = 0.87 \pm 10\% \text{ mho/m}$

|         |                          |                  |             |
|---------|--------------------------|------------------|-------------|
| ConvF X | <b>7.36</b> extrapolated | Boundary effect: |             |
| ConvF Y | <b>7.36</b> extrapolated | Alpha            | <b>0.29</b> |
| ConvF Z | <b>7.36</b> extrapolated | Depth            | <b>2.72</b> |

**Head**                      **900 MHz**                       $\epsilon_r = 42 \pm 5\%$                        $s = 0.97 \pm 10\% \text{ mho/m}$

|         |                             |                  |             |
|---------|-----------------------------|------------------|-------------|
| ConvF X | <b>6.83</b> $\pm 7\%$ (k=2) | Boundary effect: |             |
| ConvF Y | <b>6.83</b> $\pm 7\%$ (k=2) | Alpha            | <b>0.37</b> |
| ConvF Z | <b>6.83</b> $\pm 7\%$ (k=2) | Depth            | <b>2.48</b> |

**Head**                      **1500 MHz**                       $\epsilon_r = 40.4 \pm 5\%$                        $s = 1.23 \pm 10\% \text{ mho/m}$

|         |                          |                  |             |
|---------|--------------------------|------------------|-------------|
| ConvF X | <b>6.13</b> interpolated | Boundary effect: |             |
| ConvF Y | <b>6.13</b> interpolated | Alpha            | <b>0.47</b> |
| ConvF Z | <b>6.13</b> interpolated | Depth            | <b>2.17</b> |

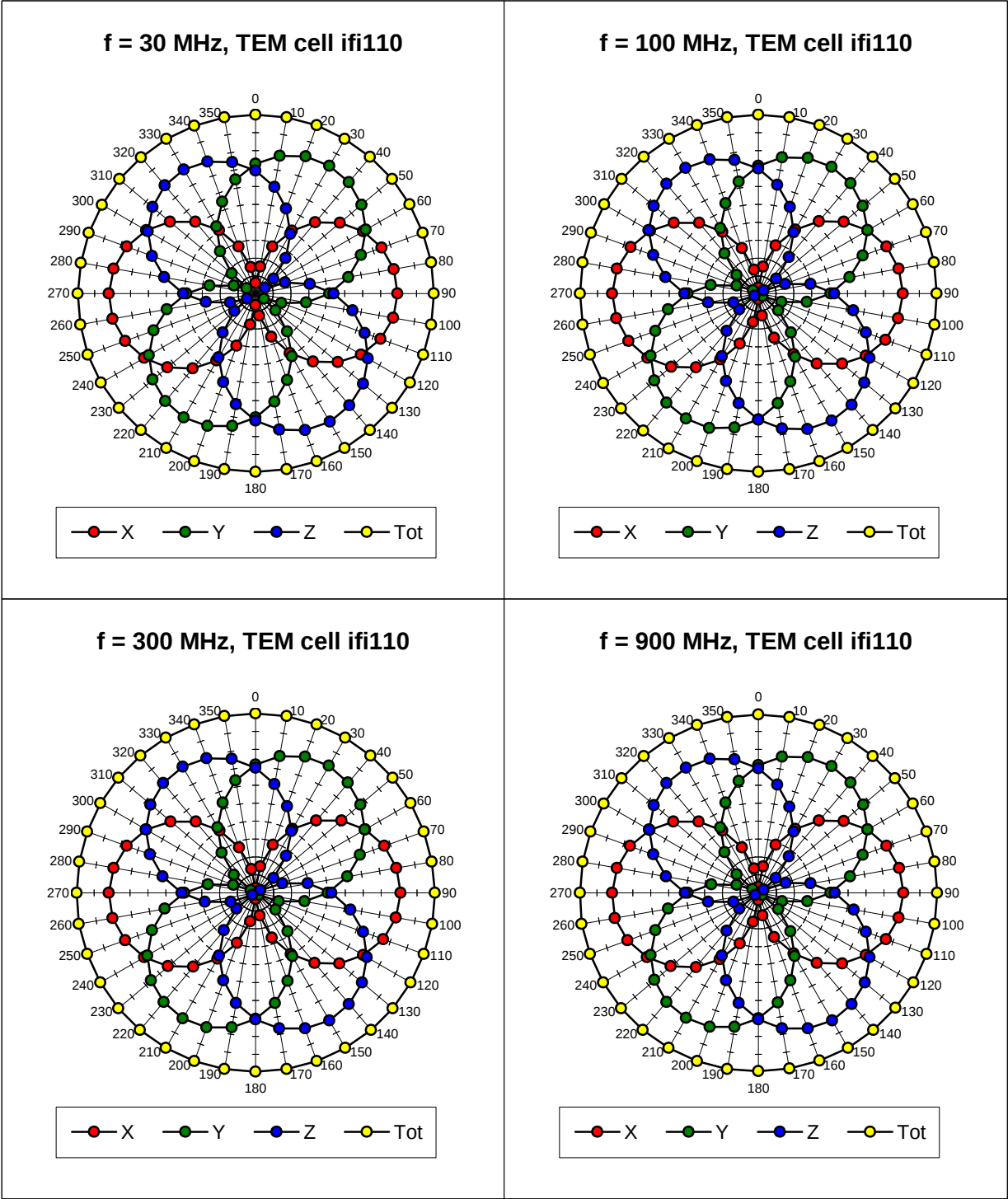
**Head**                      **1800 MHz**                       $\epsilon_r = 40 \pm 5\%$                        $s = 1.40 \pm 10\% \text{ mho/m}$

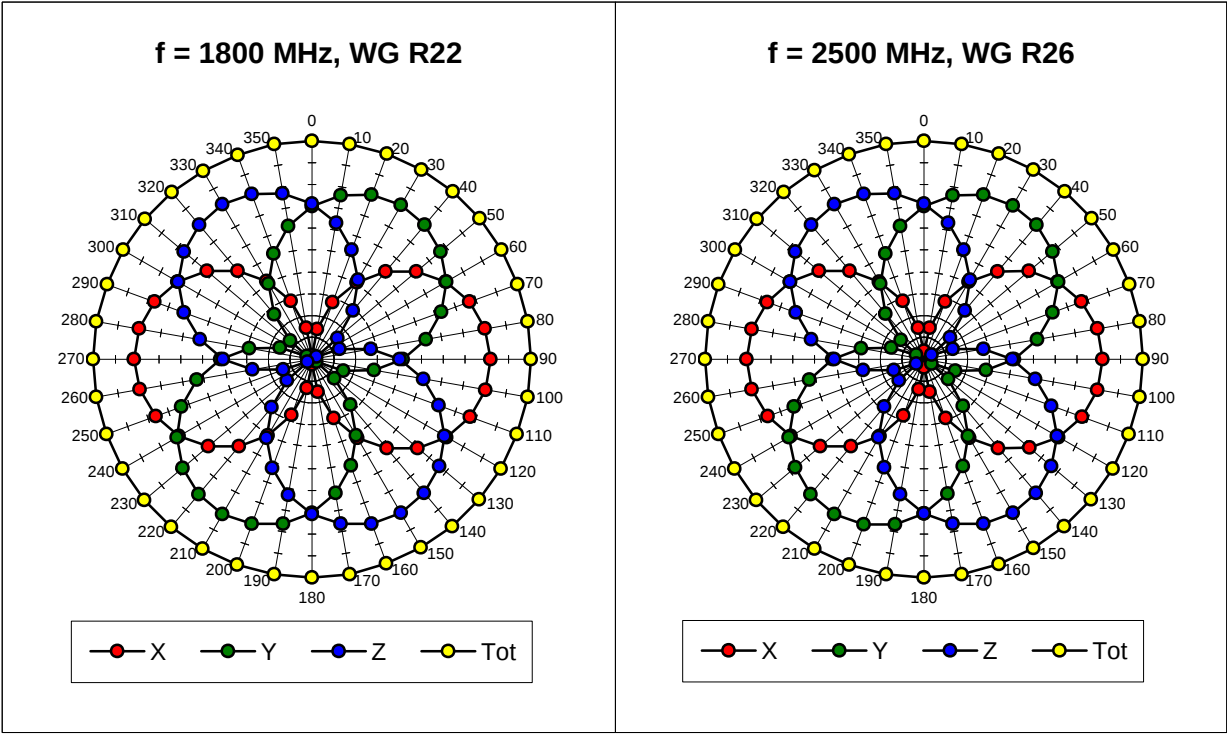
|         |                             |                  |             |
|---------|-----------------------------|------------------|-------------|
| ConvF X | <b>5.78</b> $\pm 7\%$ (k=2) | Boundary effect: |             |
| ConvF Y | <b>5.78</b> $\pm 7\%$ (k=2) | Alpha            | <b>0.53</b> |
| ConvF Z | <b>5.78</b> $\pm 7\%$ (k=2) | Depth            | <b>2.01</b> |

## Sensor Offset

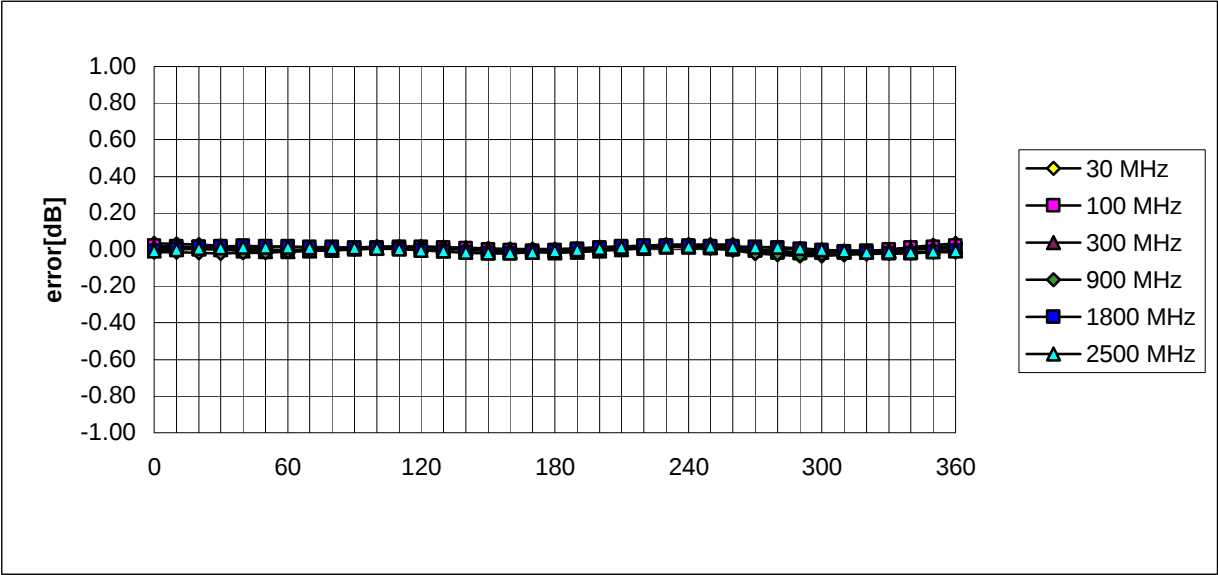
|                            |                                 |    |
|----------------------------|---------------------------------|----|
| Probe Tip to Sensor Center | <b>2.7</b>                      | mm |
| Optical Surface Detection  | <b>1.2 <math>\pm</math> 0.2</b> | mm |

Receiving Pattern (f) , q = 0°

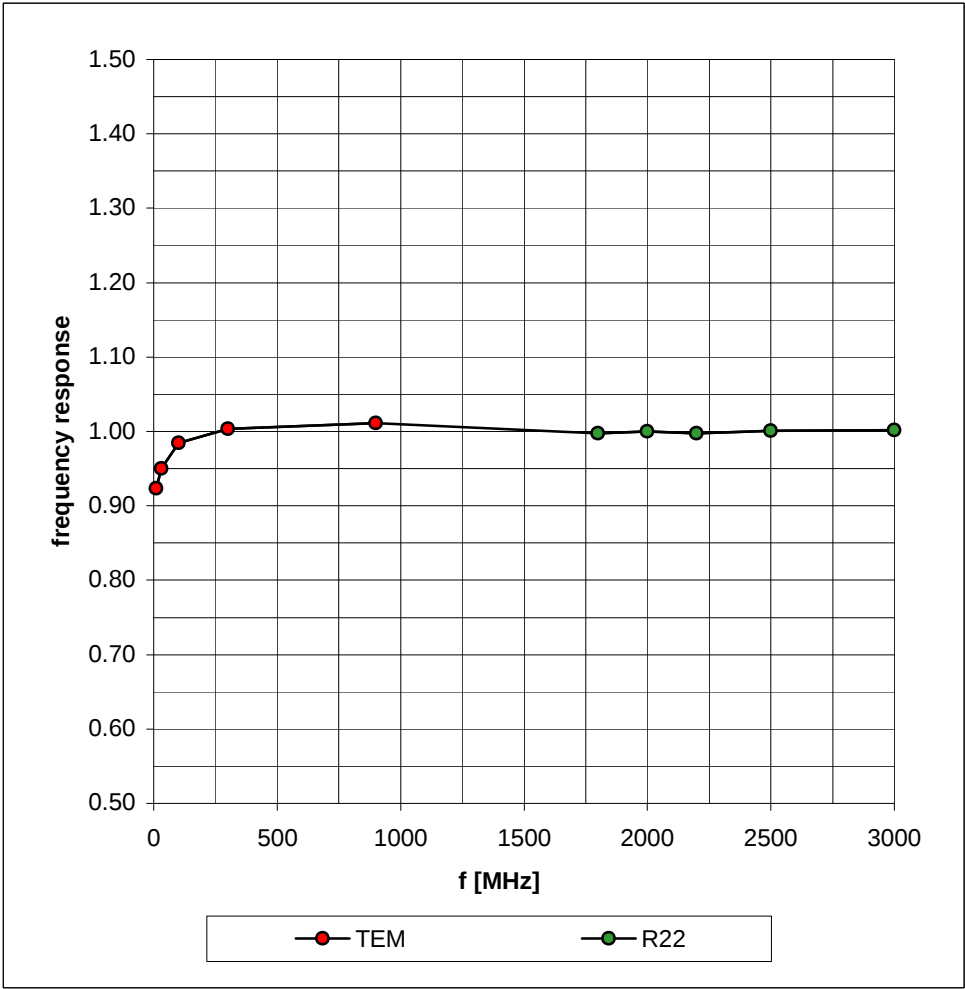




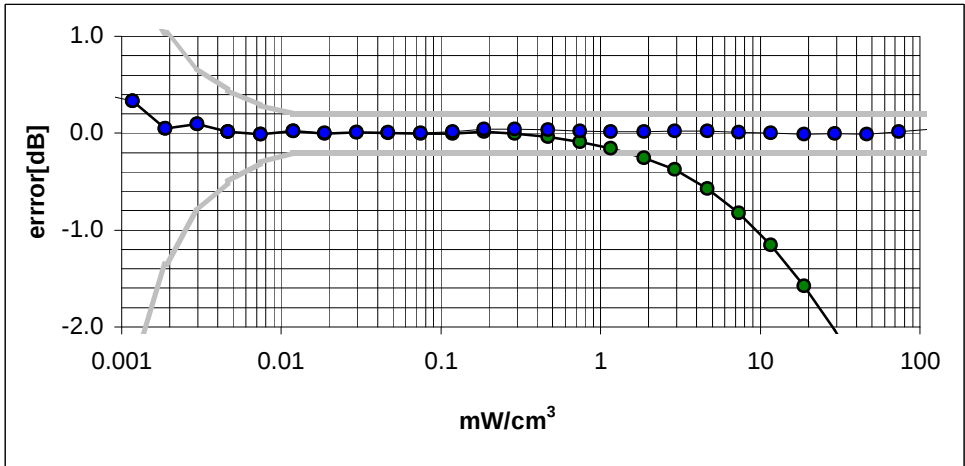
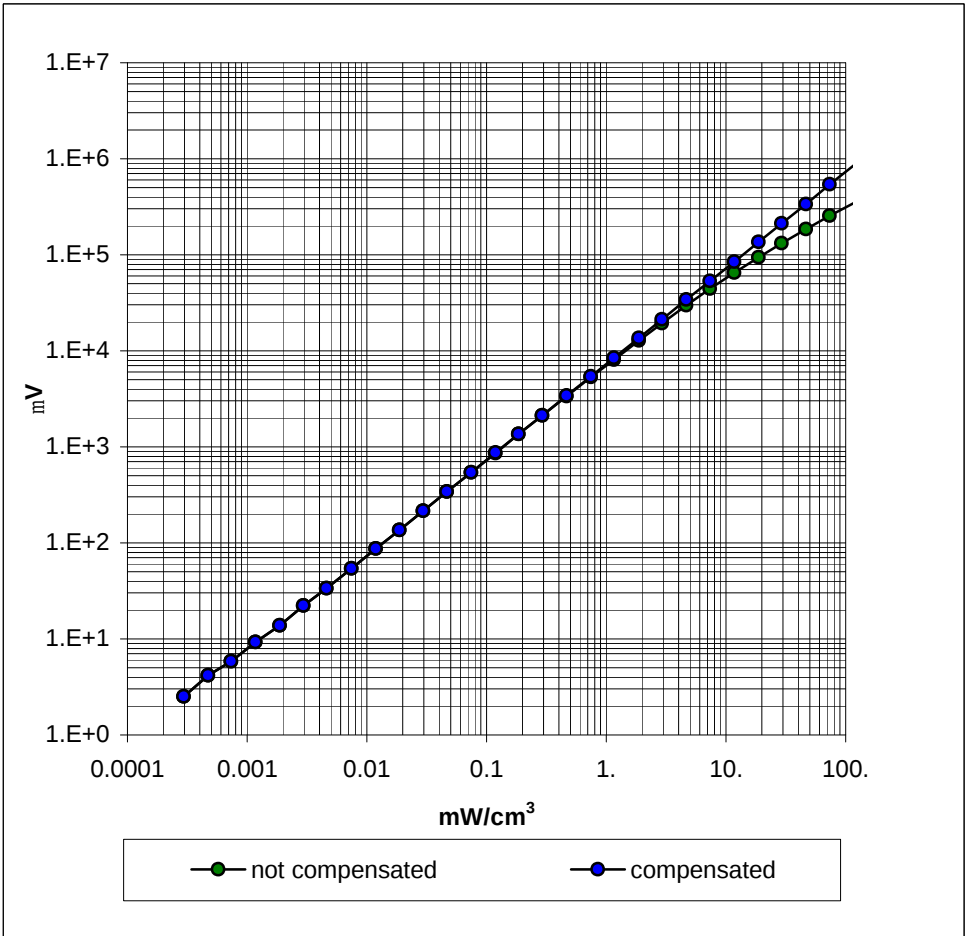
Isotropy Error (f), q = 0°



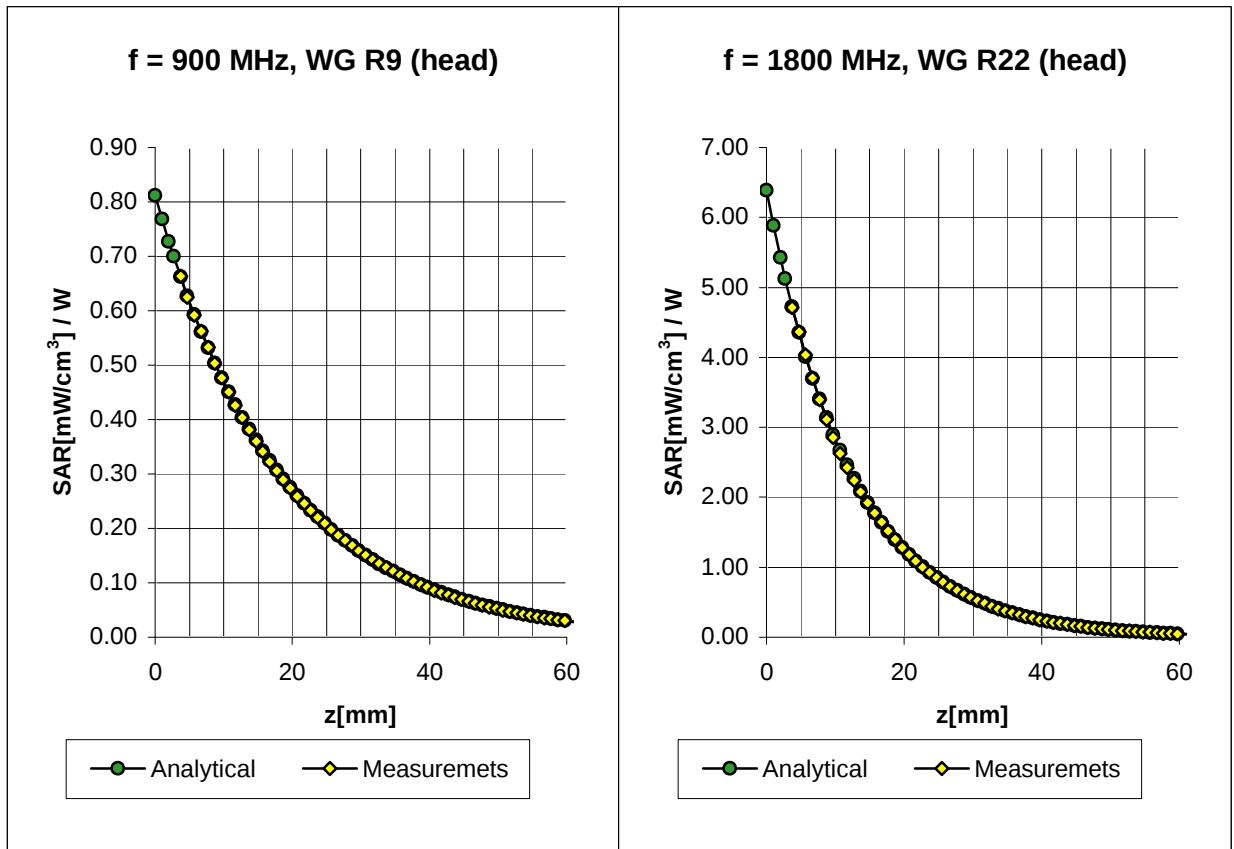
Frequency Response of E-Field  
( TEM-Cell:ifi110, Waveguide R22)



Dynamic Range f(SAR<sub>brain</sub>)  
( TEM-Cell:ifi110 )



# Conversion Factor Assessment

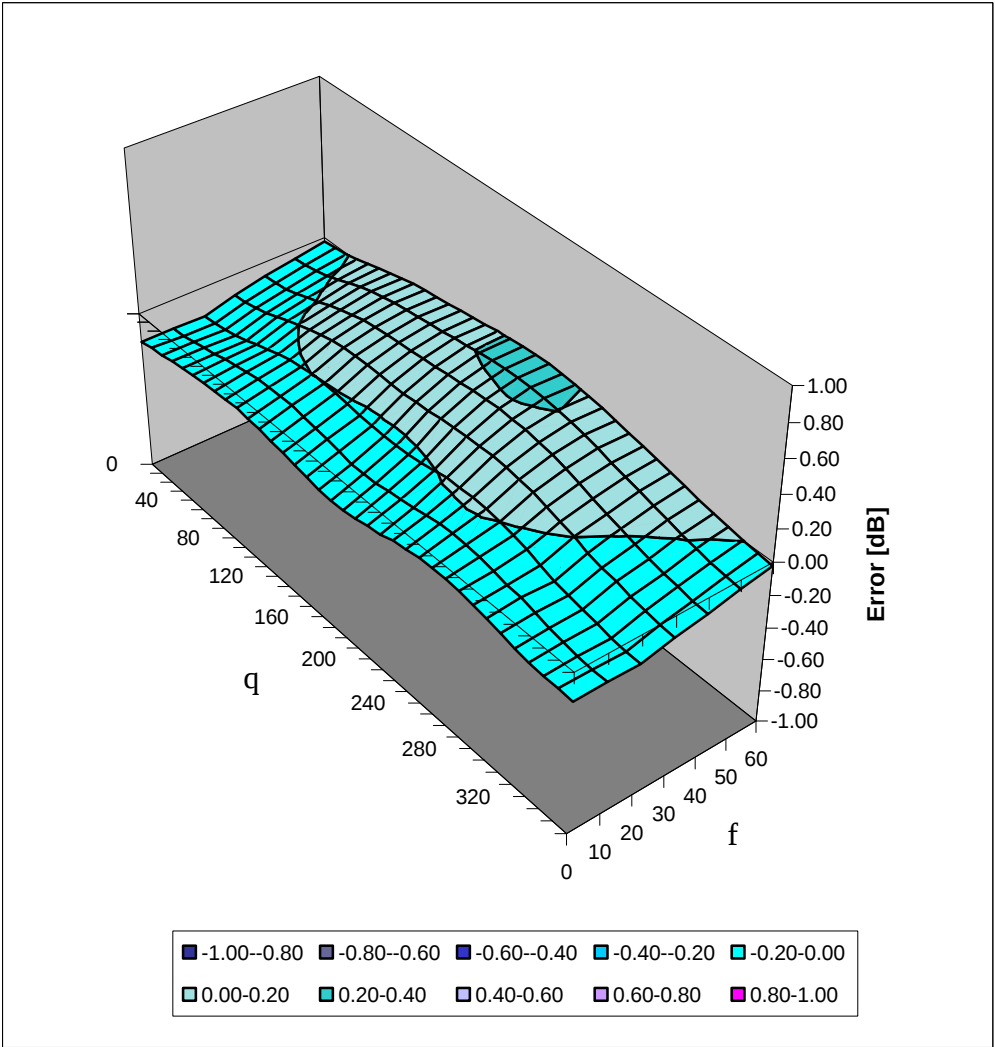


|      |          |                             |                                   |
|------|----------|-----------------------------|-----------------------------------|
| Head | 900 MHz  | $\epsilon_r = 42 \pm 5\%$   | $s = 0.97 \pm 10\% \text{ mho/m}$ |
|      | ConvF X  | <b>6.83</b> $\pm 7\%$ (k=2) | Boundary effect:                  |
|      | ConvF Y  | <b>6.83</b> $\pm 7\%$ (k=2) | Alpha <b>0.37</b>                 |
|      | ConvF Z  | <b>6.83</b> $\pm 7\%$ (k=2) | Depth <b>2.48</b>                 |
| Head | 1800 MHz | $\epsilon_r = 40 \pm 5\%$   | $s = 1.40 \pm 10\% \text{ mho/m}$ |
|      | ConvF X  | <b>5.78</b> $\pm 7\%$ (k=2) | Boundary effect:                  |
|      | ConvF Y  | <b>5.78</b> $\pm 7\%$ (k=2) | Alpha <b>0.53</b>                 |
|      | ConvF Z  | <b>5.78</b> $\pm 7\%$ (k=2) | Depth <b>2.01</b>                 |

ET3DV6 SN:1590

# Deviation from Isotropy in HSL

Error (qf ), f = 900 MHz



## ***APPENDIX D - SAR TEST SETUP PHOTOGRAPHS***

**BODY SAR TEST SETUP PHOTOGRAPHS**  
**with 1.5cm Separation Distance**

