

PCTEST ENGINEERING LABORATORY, INC. 6660 – B Dobbin Road · Columbia, MD 21045 · USA Telephone 410.290.6652 / Fax 410.290.6654 http://www.pctestlab.com (email: randy@pctestlab.com) CERTIFICATE OF COMPLIANCE (SAR EVALUATION)



APPLICANT NAME & ADDRESS: NEC AMERICA INC., INC.

6535 N. State Hwy. 161 Irving, TX 75039-2402

DATE & LOCATION OF TESTING:

Dates of Tests: May 19-20, 2005 Test Report S/N: 0504140284 Test Site: PCTEST Lab, Columbia MD

FCC ID:	A98-KMP7N2E1
APPLICANT NAME:	NEC AMERICA INC., INC.
EUT Type: Tx Frequency:	Single-Band PCS GSM Phone with Bluetooth 1850.20MHz – 1909.80MHz (GSM1900)

Tx Frequency: Rx Frequency: Max. RF Output Power: Max. SAR Measurement: Trade Name/Model(s): FCC Rule Part(s): Application Type: Test Device Serial No.: 1850.20MHz – 1909.80MHz (GSM1900) 1930.20MHz – 1989.80MHz (GSM1900) 1.300 W EIRP GSM1900 (31.128 dBm) / 30.0 dBm Conducted 0.61 W/kg GSM1900 Head SAR; 0.85 W/kg GSM1900 Body SAR *KMP7N2E1-4E* §2.1093; FCC/OET Bulletin 65 Supplement C [July 2001] Certification Identical Prototype [IMEI: #00440000146895]

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528 – 2003.

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

Grant Conditions: Power output listed is EIRP. SAR compliance for body-worn operating configuration is based on a separation distance of 1.5 cm between the back of the unit and the body of the user. End-users must be informed of the body-worn operating requirements for satisfying RF exposure compliance. Belt clips or holsters may not contain metallic components.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.





PCTESTÔ SAR TEST REPORT		FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 1 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



TABLE OF CONTENTS

1.	INTRODUCTION / SAR DEFINITION
2.	SAR MEASUREMENT SETUP4
3.	ALIDX-500 E-FIELD PROBE SYSTEM
4.	PROBE CALIBRATION PROCESS
5.	PHANTOM & EQUIVALENT TISSUES7
6.	TEST SYSTEM SPECIFICATIONS
7.	DOSIMETRIC ASSESSMENT & PHANTOM SPECS9
8.	DEFINITION OF REFERENCE POINTS
9.	TEST CONFIGURATION POSITION
10.	ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS12
11.	MEASUREMENT UNCERTAINTIES
12.	SAR TEST DATA SUMMARY14
13.	SAR TEST EQUIPMENT
14.	CONCLUSION16
15.	REFERENCES17
EX⊢	IIBIT A. SYSTEM VERIFICATION
EX⊢	IIBIT A. SAR DATA SUMMARY

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 2 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



1. INTRODUCTION / SAR DEFINITION

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

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in *IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.* (c) 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in *IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave*[3] is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in *Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields, "* NCRP Report No. 86 (c) NCRP, 1986, Bethesda, MD 20814.[6] SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (r). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 1.1).

$$S A R = \frac{d}{d t} \left(\frac{d U}{d m} \right) = \frac{d}{d t} \left(\frac{d U}{r d v} \right)$$

Figure 1.1 SAR Mathematical Equation

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

SAR	2 =	<i>s E</i> ² / <i>r</i>
where:		
S	=	conductivity of the tissue-simulant material (S/m)
r	=	mass density of the tissue-simulant material (kg/m ³)
Ε	=	Total RMS electric field strength (V/m)

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

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 3 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



2. SAR MEASUREMENT SETUP

Robotic System

Measurements are performed using the ALIDX-500 automated dosimetric assessment system. The ALIDX-500 is made by IDX Robotics, Inc. (IDX) in the United States and consists of high precision robotics system (CRS), robot controller, Pentium 4 computer, near-field probe, probe alignment sensor, and the Left and Right SAM phantoms containing the head/brain equivalent tissue, and the flat phantoms for body/muscle equivalent. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 2.1).

System Hardware

The Robot table consists of the power supply, robot controller, safety computer, teach pendant (Joystick), sixaxis robot arm, and the probe. The cell controller consists of DELL Dimension 4300 Pentium-4 1.6 GHz computer with Windows 2000 system and SAR Measurement software, National Instruments analog card, monitor, keyboard, and mouse. The robot controller is connected to the cell controller to communicate between the two computers. The probe data is connected to the cell controller via data acquisition cables.

System Electronics

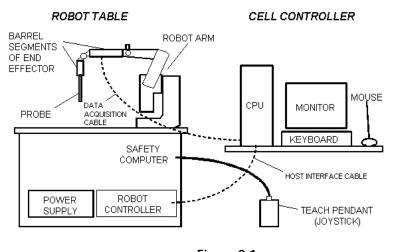


Figure 2.1 SAR Measurement System Setup

When the Robot is in the home position, the Y-axis of the coordinate system parallels the line of intersection between the tabletop and the long axis of the Robot's Large Shoulder. The Teach Pendant may be used to establish the X,Y coordinate directions by depressing the 0-X and 0-Y MOTOR/AXIS switches while in axis mode.

The robot is first taught to position the probe sensor following a specific pattern of points. In the first sweep the sensor enclosure touches the inside of the phantom head. The SAR is measured on a defined grid of points that are concentrated on the surface of the head closest to the antenna of the transmitting device (EUT).

PCTESTÔ SAR TEST REI	PORT	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 4 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



3. ALIDX-500 E-FIELD PROBE SYSTEM

Probe Measurement System



The near-field probe is an implantable isotropic E-field probe that measures the voltages proportional to the $|E|^2$ (electric) or $|H|^2$ (magnetic) fields. The probe is enclosed in a hollow glass protective cylinder 9-mm. outer diameter, 0.5 mm. thickness and 30 cm. in length. The E-probe contains three electrically small array of orthogonal dipoles strategically placed to provide greater accuracy and to compensate for near-field spatial gradients. The probe contains diodes that are placed over the gap of the dipoles to improve RF detection. The electrical signal detected by each diode is amplified by three DC amplifiers and are contained in a shielded container in the robot end effector so its performance is not affected by the presence of incident electromagnetic fields (see Fig. 3.1).

Fig 3.1 IDX System

Probe Specifications

Frequency Range:	10 kHz – 6.0 GHz	
Calibration:	In air from 10 MHz to 6.0 GHz	
Sensitivity:	In brain and muscle simulating tissue up to 5800MHz 3.5 mV/mW/cm ² (air – typical)	at Frequencies from 835
DC Resistance:	300 kohm	EXCELO-
		STr 11
Isotropic Response:	0.25 dB	
Dynamic Range:	10 mW/kg – 100 W/kg	
Resistance to Pull:	25 N	
Probe Length:	290 mm	Figure 3.2
Probe Tip Material:	Glass	Triangular Probe Configuration
Probe Tip Length:	40 mm	
Probe Tip Diameter:	7 ± 0.2 mm	
Application:	SAR Dosimetry Testing	
	HAC (Hearing Aid Compatibility)	
	Compliance tests of mobile phones	

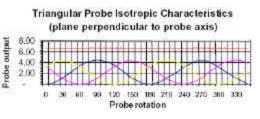


Figure 3.3 Probe Characteristics

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 5 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



4. PROBE CALIBRATION PROCESS

Dosimetric Assessment Procedure

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

Free Space Assessment

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

Temperature Assessment

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

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

where:

 Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

 ΔT = temperature increase due to RF exposure.

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

SAR =
$$\frac{|\mathbf{E}|^2 \cdot \mathbf{s}}{\mathbf{r}}$$

where:

 σ = simulated tissue conductivity,

 ρ = Tissue density (1.25 g/cm³ for brain tissue)

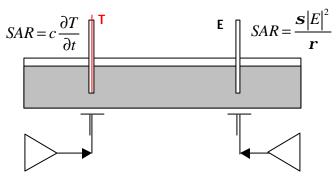


Figure 4.1 Temperature Assessment Test Configuration

PCTESTÔ SAR TEST REPORT	POTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 6 of 23
0504140284	May 19-20, 2005	Single - Band PCS GSM	A98-KMP7N2E1	



5. PHANTOM & EQUIVALENT TISSUES



Figure 5.1 SAM Phantoms

The Left and Right SAM Phantoms are constructed of a vivac composite integrated in a corian stand. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users [7][8]. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. 5.1)

Brain & Muscle Simulating Mixture Characterization



Figure 5.2 Head Simulated Tissue

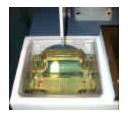


Figure 5.3 Body/Muscle Simulated Tissue

The brain and muscle mixtures consist of a viscous gel using hydroxethylcellullose (HEC) gelling agent and saline solution (see Table 6.1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 have been incorporated in the following table. Other head and body tissue parameters that have not been specified in P1528 are derived from the issue dielectric parameters computed from the 4-Cole-Cole equations. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrove [9].(see Table 5.1)

logrodients			_		Frequencia	o (Mile	2	_	71		
(% by neight)	-4	450		815		915		1900		2450	
Timue Type	Head	Body	theat;	Body	Head	Body	Heid	Bidy	Head	Both	
Water	38.56	51.36	41,45	52.4	41.05	56.0	54.9	42.4	62.7	73.2	
Salt (NaCi)	3.95	1.49	1.45	3.4	1.15	0.76	0,18	0.5	0.5	0.64	
Sogar	56.32	46.78	56.0	45.0	56.5	41.75	.0.0	58.0	0.0	. 0,0	
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	.0.0	
Hastericide	0.19	0.05	0,1	0,1	- 9.1	0.27	0.0	:0.1	0.0	0.0	
Triton X-100	0,0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.#	0.0	
DGBE	0.0	0.0	8:0	0.0	0.0	0.0	44.92	0.0	0,0	-26.7	

Water De-Ioniaed, 16 MO resistivity HEC Hydroxysthyl Callulou DGBE 99 % Dijethylme glynel) hittyl ether, [2-(2-hutoxyethoxy)ethauol] Trinon X-100 (ultra pure). Polyethylme glycol mono [4-(1,1,3,3-httramethylburyl)phenyl] ather

In combination with the SAM Phantom, the EUT Holder (see Fig. 6.2) enables the rotation of

 Table 5.1

 Composition of the Brain & Muscle Tissue Equivalent Matter

Device Holder



the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. Device positioning is accurate and repeatable according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

Figure 5.4 Device Positioner

* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations [8]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

PCTESTÔ SAR TEST REPORT		FCC CERTIFICATION		FCC CERTIFICATION		
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 7 of 23		
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1			



6. TEST SYSTEM SPECIFICATIONS

Automated Test System Specifications

Positioner

Robot: Repeatability: No. Of axes: CRS Robotics, Inc. Robot Model: F3 ± 0.05 mm (0.002 in.) 6

Data Acquisition Electronic (DAE) System

-	Cell Controller	
Processor:		Pentium 4
	Clock Speed:	1.6 GHz
	Operating System:	Windows 2000 [™] Professional
Data Card:		NI DAQ Card (in CPU)
	Data Converter	
	Software:	IDX Flexware
	Connecting Lines:	Data Acquisition Cable RS-232 Host Interface Cable
	Sampling Rate:	6000 samples/sec



Figure 6.1 ALIDX-500 Test System

E-Field Probes

Model:	E-020 S/N: PCT005
Construction:	Triangular core absolute encoder system
Frequency:	10 MHz to 6.0 GHz

Phantom

Phantom:	SAM Phantoms (Left & Right)	
Shell Material:	Vivac Composite	
Thickness:	2.0 ± 0.2 mm	

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 8 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



7. DOSIMETRIC ASSESSMENT & PHANTOM SPECS

Measurement Procedure

The measurement procedure consists of the process parameters, probe parameters, EUT product data, and measurement scans (teach points). The measurement procedure is a set of predefined points to be scanned and measured by the probe, DC amplified and processed by the cell controller. The corresponding voltages determined by the electric and magnetic fields are extrapolated to determine peak SAR value.

The SAR Measurement System measures field strength by employing two different types of systematic measurement scans; a coarse scan and a fine scan. Coarse and fine scans measure field strength in a rectangular area within the XY plane (a plane parallel to the top of the Robot Table). The measurement area is divided into a grid of small squares defined by equally spaced grid lines. During an actual measurement process, the probe moves along grid lines systematically recording the field strength at grid line intersections. Typically, after a coarse scan is completed, a fine scan is conducted at the peak field strength value (hot spot) that was measured in the coarse scan. The fine scan has a greater resolution (smaller grid squares) than the coarse scan, and covers only a fraction of the measurement area in the coarse scan.

Deviation from measurement procedure - None

Specific Anthropomorphic Mannequin (SAM) Specifications

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. 7.1). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface. The SAM shell thickness is 2.0 ± 0.2 mm.



Figure 7.1 Left and Right SAM Phantom shells

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 9 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



8. **DEFINITION OF REFERENCE POINTS**

EAR Reference Point (ERP)



Figure 8.2 Close-up side view of ERPs

Figure 8.1 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERPs are 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 9.2. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 8.2). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].

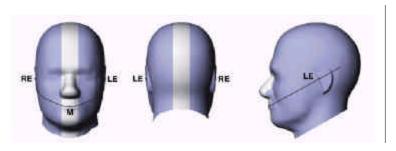


Figure 8.1 Front, back and side view of SAM Twin Phantom

Handset Reference Points

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the "test device reference point" located along the "vertical centerline" on the front of the device aligned to the "ear reference point" (See Fig. 8.3). The "test device reference point" was than located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at it's top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.

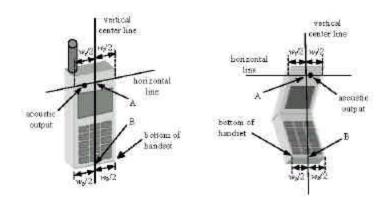


Figure 8.3 Handset Vertical Center & Horizontal Line Reference Points

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 10 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



9. TEST CONFIGURATION POSITION

Body Holster /Belt Clip Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device

and positioned against a flat phantom in a normal use configuration (see Figure 9.1). A device with a headset output is tested with a headset connected to the device. Body dielectric parameters are used.

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





Figure 9.1 Body Belt Clip & Holster Configurations

Body-worn accessories may not always be supplied or

available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration where a separation distance between the back of the device and the flat phantom is used. All test position spacings are documented.

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

In all cases SAR measurements are performed to investigate the worst-case positioning. Worst-case positioning is then documented and used to perform Body SAR testing.

In order for users to be aware of the body-worn operating requirements for meeting RF exposure compliance, operating instructions and cautions statements must be included in the user's manual.

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 11 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



10. ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS

Uncontrolled Environment

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

Controlled Environment

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

	HUMAN EXPOSURE LIMITS	
	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)
SPATIAL PEAK SAR 1 Brain	1.60	8.00
SPATIAL AVERAGE SAR 2 Whole Body	0.08	0.40
SPATIAL PEAK SAR 3 Hands, Feet, Ankles, Wrists	4.00	20.00

Table 10.1. Safety Limits for Partial Body Exposure [2]

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

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	r none rype.	FCC ID: A98-KMP7N2E1	Page 12 of 23

¹ The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

² The Spatial Average value of the SAR averaged over the whole body.



11. MEASUREMENT UNCERTAINTIES

а	b	С	d	e=	f	g	h =	i =	k
				f(d,k)			cxf/e	cxg/e	
Uncertainty		Tol.	Prob.		Ci	Ci	1 - g	10 - g	
Component	Sec.	(± %)	Dist.	Div.	(1 - g)	(10 - g)	ui	ui	vi
							(± %)	(± %)	
Measurement System									
Probe Calibration	E1.1	11.4	Ν	√3	1	1	6.6	6.6	~
Axial Isotropy	E1.2	3.4	R	$\sqrt{3}$	0.7	0.7	1.4	1.4	∞
Hemishperical Isotropy	E1.2	5.2	R	$\sqrt{3}$	1	1	3.0	3.0	∞
Boundary Effect	E1.3	4.7	R	√3	1	1	2.7	2.7	∞
Linearity	E1.4	5.9	R	√3	1	1	3.4	3.4	∞
System Detection Limits	E1.5	1.0	R	√3	1	1	0.6	0.6	∞
Readout Electronics	E1.6	1.0	R	1	1	1	1.0	1.0	∞
Response Time	E1.7	0.8	R	√3	1	1	0.5	0.5	8
Integration Time	E1.8	1.7	R	√3	1	1	1.0	1.0	8
RF Ambient Conditions	E5.1	1.2	R	√3	1	1	0.7	0.7	~
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	√3	1	1	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E5.3	2.9	R	√3	1	1	1.7	1.7	~
Shell									
Extrapolation, Interpolation & Integration	E4.2	3.9	R	√3	1	1	2.3	2.3	∞
Algorithms for Max. SAR Evaluation									
Test Sample Related									
Test Sample Positioning	E3.2.1	10.6	R	√3	1	1	6.1	6.1	11
Device Holder Uncertainty	E3.1.1	8.7	R	√3	1	1	5.0	5.0	8
Output Power Variation - SAR drift	5.6.2	5.0	R	√3	1	1	2.9	2.9	8
measurement									
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness	E2.1	4.0	R	√3	1	1	2.3	2.3	8
tolerances)									
Liquid Conductivity - deviation from	E2.2	5.0	R	√3	0.7	0.5	2.0	1.4	∞
target values									
Liquid Conductivity - measurement	E2.2	5.0	R	√3	0.7	0.5	2.0	1.4	∞
uncertainty									
Liquid Permittivity - deviation from	E2.2	5.0	R	√3	0.6	0.5	1.7	1.4	∞
target values									
Liquid Permittivity - measurement	E2.2	5.0	R	√3	0.6	0.5	1.7	1.4	∞
uncertainty			DOG				10.0	10.0	
Combined Standard Uncertainty (k=1)			RSS				13.2	13.0	
Expanded Uncertainty (k=2) (95% CONFIDENCE LEVEL)							26.6	26.2	

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

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 13 of 23
0504140284	May 19-20, 2005	Single-Band PCS GSM	A98-KMP7N2E1	



12. SAR TEST DATA SUMMARY

See Measurement Result Data Pages

Procedures Used To Establish Test Signal

The device was placed into continuous transmit mode using a base station simulator. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [4].

Device Test Conditions

The device was powered through the battery. In order to verify that the device was tested at full power, conducted output power measurements were performed before and after each SAR measurement to confirm the output power. If a power deviation of more than 5% occurred, the test was repeated.

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION		Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005		FCC ID: A98-KMP7N2E1	Page 14 of 23



13. SAR TEST EQUIPMENT

Equipment Calibration

Table 13.1 Test Equipment Calibration

	EQUIPMENT SPECIFICATIONS								
Туре		Calibration Date	Serial Number						
CRS Robot F3		February 2005	RAF0134133						
CRS C500C Motion Controller		February 2005	RCB0003303						
CRS Teach Pendant (Joystick)		February 2005	STP0132231						
DELL Computer, Pentium 4 1.6 GH	z, Windows 2000 [™]	February 2005	4PJZ111						
E-Field Probe E-020		January 2005	PCT005						
Right Ear SAM Phantom (P-SAM-R)		February 2005	94X-113						
Left Ear SAM Phantom (P-SAM-L)		February 2005	94X-019						
Flat SAM Phantom (P-SAM-FLAT)		February 2005	94X-097						
IDX Robot End Effector (EE-103-C)		February 2005	07111223						
IDX Probe Amplifier		February 2005	07111113						
Validation Dipole D-835S		May 2005	PCT640						
Validation Dipole D-1900S		May 2005	PCT641						
Brain Equivalent Matter (835MHz)		May 2005	PCTBEM101						
Brain Equivalent Matter (1900MHz)	May 2005	PCTBEM301						
Muscle Equivalent Matter (835MH)	z)	May 2005	PCTMEM201						
Muscle Equivalent Matter (1900MF	Hz)	May 2005	PCTMEM401						
Amplifier Research 5S1G4 Power A	mp	January 2005	PCT540						
Agilent E8241A (250kHz ~ 20GHz)) Signal Generator	November 2004	US42110432						
HP-8753E (30kHz ~ 6GHz) Networ	k Analyzer	January 2005	PCT552						
HP85070B Dielectric Probe Kit		January 2005	PCT501						
Ambient Noise/Reflection, etc.	<12mW/kg/<3%of SAR	January 2005	Anechoic Room PCT01						

NOTE:

Dipole Validation measurement was performed by PCTEST Lab before each test. The brain simulating material is calibrated by PCTEST using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the brain-equivalent material.

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005		FCC ID: A98-KMP7N2E1	Page 15 of 23



14. CONCLUSION

Measurement Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested. Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.[3]

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	r none rype.	FCC ID: A98-KMP7N2E1	Page 16 of 23



15. REFERENCES

[1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.

[2] ANSI/IEEE C95.1 - 1991, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 300kHz to 100GHz, New York: IEEE, Aug. 1992.

[3] ANSI/IEEE C95.3 - 1991, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave, New York: IEEE, 1992.

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

[5] IEEE Standards Coordinating Committee 34 – IEEE Std. 1528- 2003, Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices

[6] NCRP, National Council on Radiation Protection and Measurements, *Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields*, NCRP Report No. 86, 1986. Reprinted Feb. 1995.

[7] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, *The Dependence of EM Energy Absorption upon Human Head Modeling at 900 MHz*, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.

[8] N. Kuster and Q. Balzano, *Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz*, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.

[9] G. Hartsgrove, A. Kraszewski, A. Surowiec, *Simulated Biological Materials for Electromagnetic Radiation Absorption Studies*, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.

[10] Q. Balzano, O. Garay, T. Manning Jr., *Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones*, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.

[11] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, *Numerical Recepies in C*, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.

[12] Federal Communications Commission, OET Bulletin 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. Supplement C, Dec. 1997.

[13] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields High-frequency: 10kHz-300GHz, Jan. 1995.

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	Thome Type.	FCC ID: A98-KMP7N2E1	Page 17 of 23



EXHIBIT A. SYSTEM VERIFICATION

Tissue Verification

Table A.1 Simulated Tissue Verification

	835M	835MHz Brain		MHz Muscle 1900		MHz Brain	1900MHz Muscle	
	Target	Measured	Target	Measured	Target	Measured	Target	Measured
Dielectric Constant	41.50	40.64	55.20	54.86	40.00	41.80	53.30	53.12
Conductivity	0.90	0.91	0.97	0.98	1.4	1.42	1.52	1.57

Test System Validation

Prior to assessment, the system is verified to the ±10% of the specifications at 835 MHz and 1900 MHz by using the system validation kits. (Graphic Plots Attached)

Table A.2 System Validation

	System Verification TARGET & MEASURED										
Date:	Amb. Temp (°C)Liquid Temp(°C)Input Power 						Deviation (%)				
4/18/2005	23.2	21.1	0.040	1900	1.6	1.76	6.97%				
5/20/2005	22.9	20.5	0.040	1900	1.6	1.7	7.05%				





Figure A.0 Dipole Validation Test Setup

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	r none rype.	FCC ID: A98-KMP7N2E1	Page 18 of 23



EXHIBIT A. SAR DATA SUMMARY

Mixture Type: 1900MHz Brain

A.1 M	A.1 MEASUREMENT RESULTS (GSM1900 Right Head SAR – Touch)										
FREQUENCY		POWER [‡]			Device Test	Bluetooth	Antenna	SAR			
MHz	Ch.	Modulation	PCL	Battery	Position	Didetootii	Position	(W/kg)			
1850.20	512	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.61			
1880.00	661	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.48			
1909.80	810	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.55			
1850.20	512	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	2441	Fixed	0.58			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Brain 1.6 W/kg (mW/g) averaged over 1 gram					

NOTES:

- 1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. *Standard batteries are the only options.*

	[‡] Power Measured	X	Conducted		ERP		EIRP
	See Test Plots for Power Class Reference						
4.	SAR Measurement System		DASY4	X	IDX		
	Phantom Configuration		Left Head		Flat Phantom	X	Right Head
5.	SAR Configuration	X	Head		Body		Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simula	tor	
7	Tissue peremeters and temperatures are lis	tod o	n the CAD plate				

- 7. Tissue parameters and temperatures are listed on the SAR plots.
- 8. Liquid tissue depth is 15.1 cm. \pm 0.1

Alfred Cirwithian Vice President Engineering

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	r none rype.	FCC ID: A98-KMP7N2E1	Page 19 of 23



Mixture Type: 1900MHz Brain

A.2 M	A.2 MEASUREMENT RESULTS (GSM1900 Right Head SAR – Tilt)										
FREQUENCY		Modulation	PO	VER [‡]	Device Test	Antenna	SAR				
MHz	Ch.	Modulation	PCL	Battery	Position	Position	(W/kg)				
1850.20	512	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.27				
1880.00	661	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.24				
1909.80	810	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.25				
		/ IEEE C95.1 19 Spatial rolled Exposure		Brain W/kg (mW/ eraged over 1 gram							

NOTES:

 The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.

	[‡] Power Measured	X	Conducted		ERP		EIRP
	See Test Plots for Power Class Reference						
4.	SAR Measurement System		DASY4	X	IDX		
	Phantom Configuration		Left Head		Flat Phantom	X	Right Head
5.	SAR Configuration	X	Head		Body		Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simula	tor	
7	Tissue perameters and temperatures are lis	tod o	n the CAD plate				

7. Tissue parameters and temperatures are listed on the SAR plots.

8. Liquid tissue depth is 15.1 cm. \pm 0.1

Alfred Cirwithian Vice President Engineering

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename:	Test Dates:	Phone Type:	FCC ID:	Page 20 of 23
0504140284	May 19-20, 2005	Single - Band PCS GSM	A98-KMP7N2E1	



Mixture Type:

1900MHz Brain

A.3 M	A.3 MEASUREMENT RESULTS (GSM1900 Left Head SAR – Touch)										
FREQU	IENCY	Modulation	PO	POWER [‡]		POWER [‡]		Bluetooth	Antenna	SAR	
MHz	Ch.	Modulation	PCL	Battery	Position	Didetootii	Position	(W/kg)			
1850.20	512	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.53			
1880.00	661	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.55			
1909.80	810	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	-	Fixed	0.46			
1880.00	661	PCS GSM	0 (30 dBm)	Standard	Cheek / Touch	2441	Fixed	0.53			
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population						Brain 1.6 W/kg (r averaged over	nW/g)				

NOTES:

1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

2. All modes of operation were investigated, and worst-case results are reported.

3. Battery is fully charged for all readings. *Standard batteries are the only options.*

	[‡] Power Measured	X	Conducted		ERP		EIRP
	See Test Plots for Power Class Reference						
4.	SAR Measurement System		DASY4	X	IDX		
	Phantom Configuration	X	Left Head		Flat Phantom		Right Head
5.	SAR Configuration	X	Head		Body		Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station Simula	tor	
7.	Tissue parameters and temperatures are lis	sted c	on the SAR plots.				

8. Liquid tissue depth is 15.1 cm. ± 0.1

Alfred Cirwithian Vice President Engineering

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	Phone Type: Single-Band PCS GSM	FCC ID: A98-KMP7N2E1	Page 21 of 23



Mixture Type: 1880MHz Brain

A.4 M	A.4 MEASUREMENT RESULTS (GSM1900 Left Head SAR – Tilt)										
FREQUENCY		Modulation	POWER [‡]		Device Test	Antenna	SAR				
MHz	Ch.	wouldtion	PCL	Battery	Position	Position	(W/kg)				
1850.20	512	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.23				
1880.00	661	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.25				
1909.80	810	PCS GSM	0 (30 dBm)	Standard	Ear / 15° Tilt	Fixed	0.22				
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					1.6 W/	B rain Z kg (mW/g) d over 1 gram					

NOTES:

 The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].

- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. Battery is fully charged for all readings. Standard batteries are the only options.

	[‡] Power Measured	\mathbf{X}	Conducted		ERP	EIRP
	See Test Plots for Power Class Reference					
4.	SAR Measurement System		DASY4	X	IDX	
	Phantom Configuration	X	Left Head		Flat	Right Head
5.	SAR Configuration	X	Head		Body	Hand
6.	Test Signal Call Mode		Manu. Test Codes	X	Base Station	
7	Tionus more meters and term protures are lis				~ · ·	

7. Tissue parameters and temperatures are listed on the SAR plots.

8. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

Alfred Cirwithian Vice President Engineering

PCTESTÔ SAR TEST REPORT	PCTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	Thome Type:	FCC ID: A98-KMP7N2E1	Page 22 of 23



Mixture Type: 1900MHz Muscle

A.5 M	A.5 MEASUREMENT RESULTS (GPRS Body SAR w/o Belt Clip)									
FREQUENCY		Modulation	POWER [‡]		Separation	Antenna	SAR			
MHz	Ch.	wouldtion	PCL	Battery	Distance (cm) ^{‡‡}	Position	(W/kg)			
1850.20	512	GPRS	0 (30 dBm)	Standard	1.5 [w/o Belt Clip]	Fixed	0.60			
1880.00	661	GPRS	0 (30 dBm)	Standard	1.5 [w/o Belt Clip]	Fixed	0.85			
1909.80	810	GPRS	0 (30 dBm)	0 (30 dBm) Standard 1		Fixed	0.58			
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population					Muscle //kg (mW/g) ed over 1 gram				

NOTES:

4.

5. 6. 7.

- 1. The test data reported are the worst-case SAR value with the antenna-head position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.

3.	Battery is fully charged for all readings.	Standard Batteries are the only options.
----	--	--

[‡] Power Measured	X	Conducted		ERP		EIRP
See Test Plots for Power Class Reference						
SAR Measurement System		DASY3	X	IDX		
Phantom Configuration		Left Head	X	Flat Phantom		Right Head
SAR Configuration		Head	X	Body		Hand
Test Signal Call Mode		Manu. Test Codes	X	Base Station Simula	tor	
^{‡‡} Test Configuration		With Belt Clip	X	Without Belt Clip		
Tissue parameters and temperatures are lis	tod o	n the CAD plate				

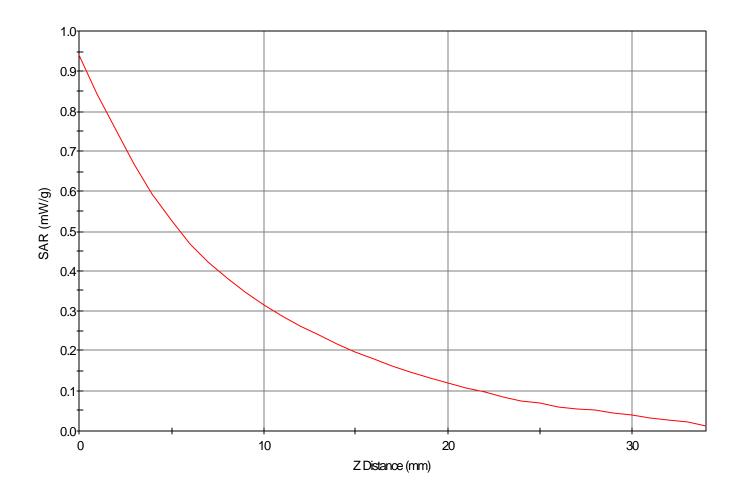
- 8. Tissue parameters and temperatures are listed on the SAR plots.
- 9. Both sides of the phone were tested and the worst-case side is reported.
- 10. Liquid tissue depth is $15.1 \text{ cm.} \pm 0.1$

Alfred Cirwithian Vice President Engineering

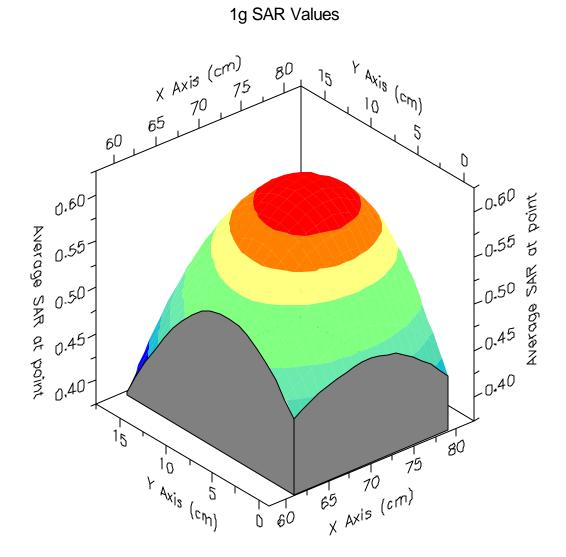
PCTESTÔ SAR TEST REPORT	POTEST	FCC CERTIFICATION	NEC	Reviewed by: Quality Manager
SAR Filename: 0504140284	Test Dates: May 19-20, 2005	Phone Type: Single-Band PCS GSM	FCC ID: A98-KMP7N2E1	Page 23 of 23

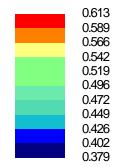
APPENDIX A: SAR TEST DATA

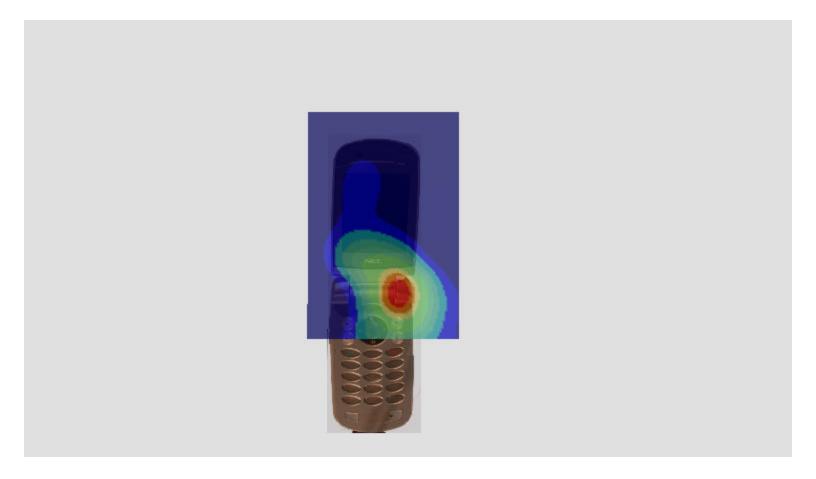
```
SAR Data Report 05041812
              : 18-Apr-05 04:30:39 pm
  Start
  End
             : 18-Apr-05 04:38:30 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC Phone
  Type
  Model Number : 250414
  Serial Number : 1
 Frequency: 1850.20 MHzTransmit Pwr: 1 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
                : SAM-RIGHT
  Phantom Name
  Phantom Type : Right Ear
Tissue Type : Brain
  Tissue Dielectric : 41.800
  Tissue Conductivity : 1.420
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                       : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Probe OIIset1.000Conversion Factor5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
              6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  GSM PCS Mode CH-512
  Right Cheek
  CF=8; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.042
  Reading @ End = 0.043
  Power at End
                 = 104.0%
Area Scan - Max Peak SAR Value at x=70.0 y=8.0 = 0.63 W/kg
Zoom Scan - Max Peak SAR Value at x=70.0 y=13.0 z=0.0 = 0.94 W/kg
Max 1g SAR at x=73.0 y=8.0 z=0.0 = 0.61 W/kg
Max 10g SAR at x=71.0 y=8.0 z=0.0 = 0.34 W/kg
```



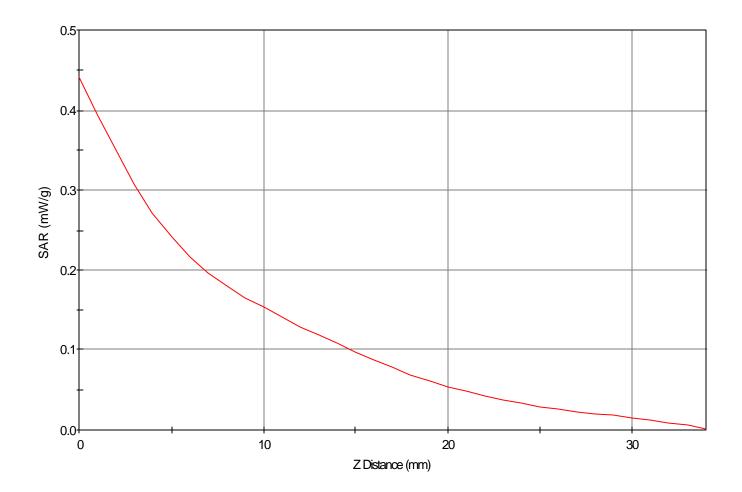
SAR - Z Axis at Hotspot x:70.0 y:13.0



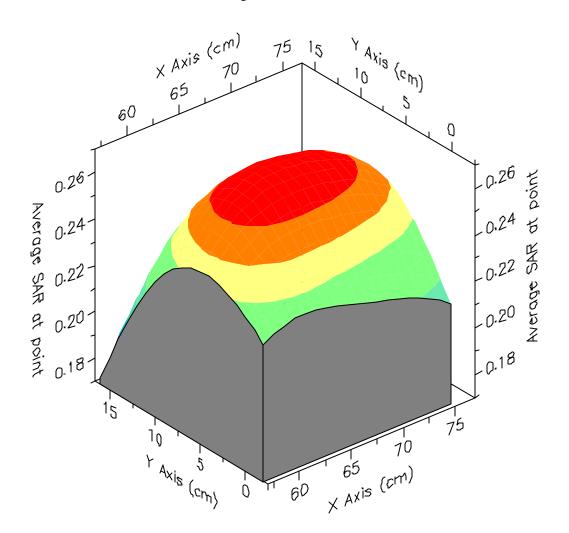


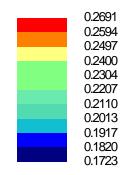


```
SAR Data Report 05041815
              : 18-Apr-05 05:19:12 pm
  Start
  End
             : 18-Apr-05 05:27:05 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC Phone
  Type
  Model Number : 250414
  Serial Number : 1
 Frequency: 1850.20 MHzTransmit Pwr: 1 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
                : SAM-RIGHT
  Phantom Name
  Phantom Type : Right Ear
Tissue Type : Brain
  Tissue Dielectric : 41.800
  Tissue Conductivity : 1.420
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                        : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Probe OIIset1.000Conversion Factor5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
              6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  GSM PCS Mode CH-512
 Right Tilt
  CF=8; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.086
  Reading @ End = 0.089
  Power at End
                 = 103.5%
Area Scan - Max Peak SAR Value at x=66.0 y=7.0 = 0.30 W/kg
Zoom Scan - Max Peak SAR Value at x=66.0 y=6.0 z=0.0 = 0.44 W/kg
Max 1g SAR at x=65.0 y=6.0 z=0.0 = 0.27 \text{ W/kg}
Max 10g SAR at x=66.0 y=5.0 z=0.0 = 0.16 W/kg
```

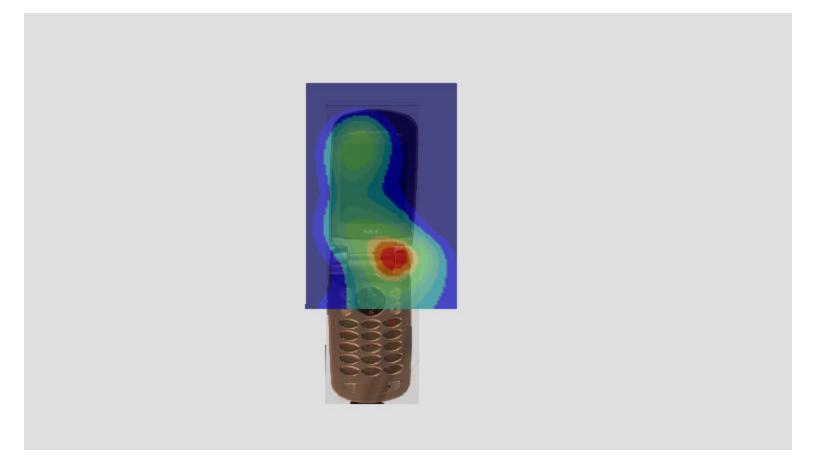


SAR - Z Axis at Hotspot x:66.0 y:6.0





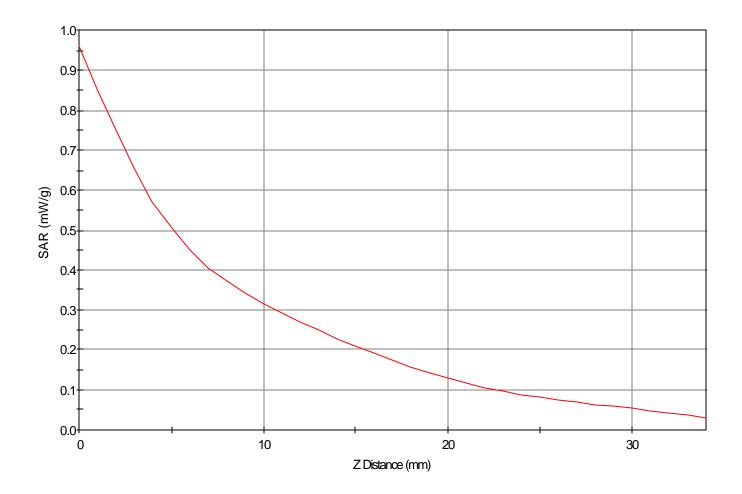
1g SAR Values



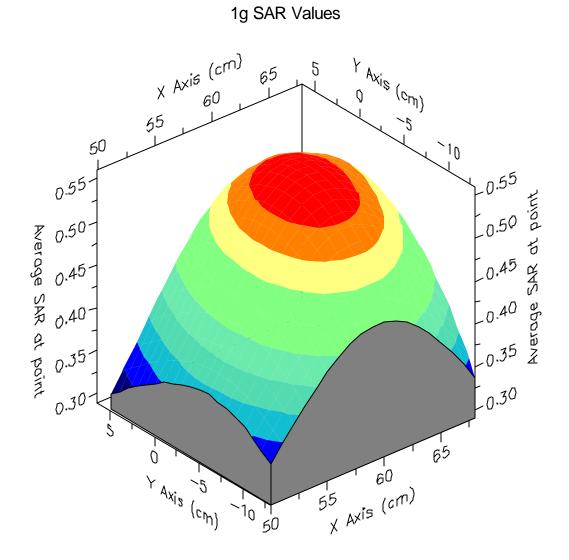
```
SAR Data Report 05041816
              : 18-Apr-05 05:29:51 pm
  Start
  End
             : 18-Apr-05 05:37:10 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC Phone
  Type
  Model Number : 250414
  Serial Number : 1
 Frequency: 1880 MHzTransmit Pwr: 1 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
                : SAM-LEFT
  Phantom Name
  Phantom Type : Local

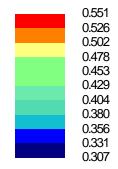
Phantom Type : Brain

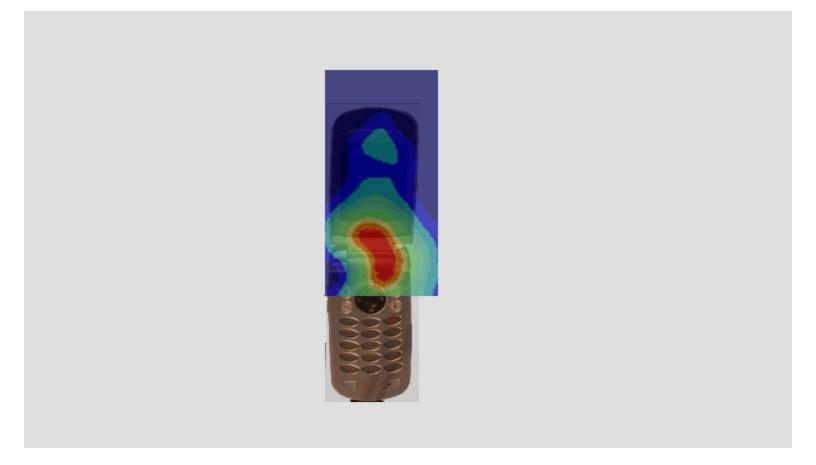
1 200
                    : Left Ear
  Tissue Dielectric : 41.800
  Tissue Conductivity : 1.420
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                        : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Conversion Factor : 5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  GSM PCS Mode CH-661
  Left Cheek
  CF=8; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.093
  Reading @ End = 0.101
  Power at End
                 = 108.4%
Area Scan - Max Peak SAR Value at x=59.0 y=-4.0 = 0.52 W/kg
Zoom Scan - Max Peak SAR Value at x=60.0 y=-3.0 z=0.0 = 0.96 W/kg
Max 1g SAR at x=61.0 y=-3.0 z=0.0 = 0.55 W/kg
Max 10g SAR at x=62.0 y=-1.0 z=0.0 = 0.31 \text{ W/kg}
```



SAR - Z Axis at Hotspot x:60.0 y:-3.0



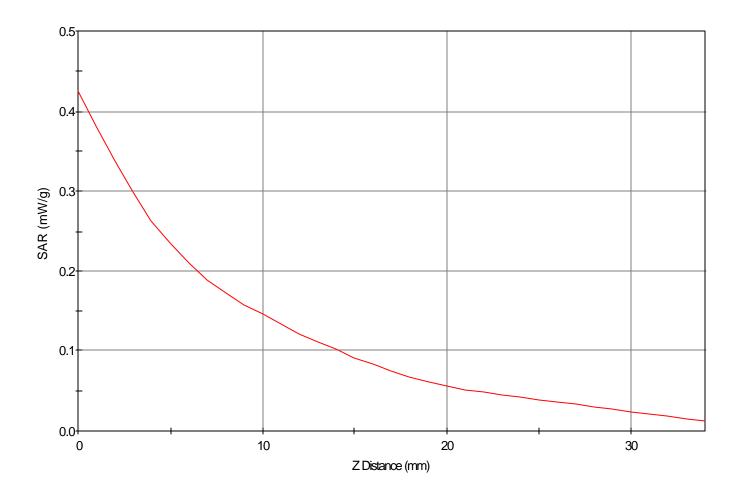




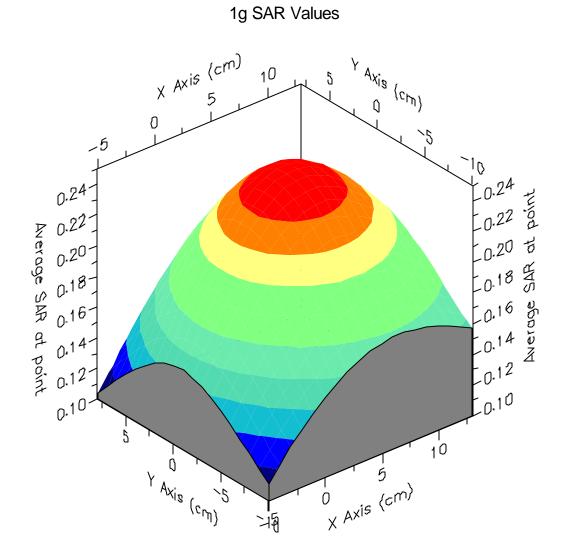
```
SAR Data Report 05042014
              : 20-Apr-05 01:25:54 pm
  Start
  End
              : 20-Apr-05 01:33:19 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC Phone
  Type
  Model Number : KMP7N2E1
  Serial Number : 00440000146936
 Frequency: 1880 MHzTransmit Pwr: 1 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
                : SAM-LEFT
  Phantom Name
  Phantom Type : Local

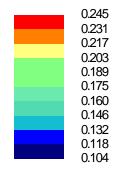
Phantom Type : Brain

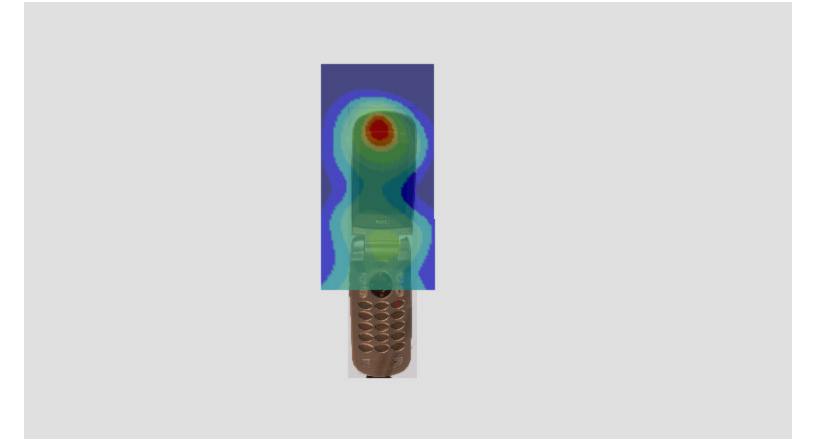
1 200
                    : Left Ear
  Tissue Dielectric : 41.800
  Tissue Conductivity : 1.420
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                        : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                        : 1900 MHz
                        : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Probe OIIset1.000Conversion Factor5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  GSM PCS Mode CH - 661
  Left Tilt
  CF=8; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.259
  Reading @ End = 0.258
  Power at End
                 = 99.6%
Area Scan - Max Peak SAR Value at x=4.0 y=-1.0 = 0.26 W/kg
Zoom Scan - Max Peak SAR Value at x=4.0 y=-1.0 z=0.0 = 0.43 W/kg
Max 1g SAR at x=5.0 y=0.0 z=0.0 = 0.25 W/kg
Max 10g SAR at x=7.0 y=0.0 z=0.0 = 0.13 \text{ W/kg}
```



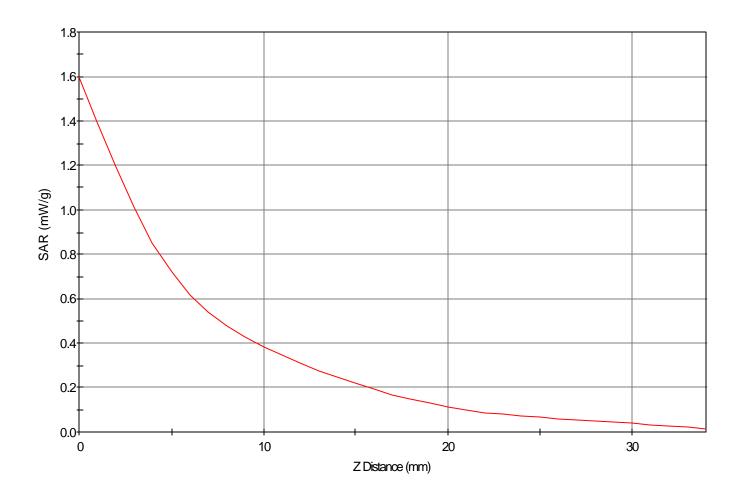
SAR - Z Axis at Hotspot x:4.0 y:-1.0



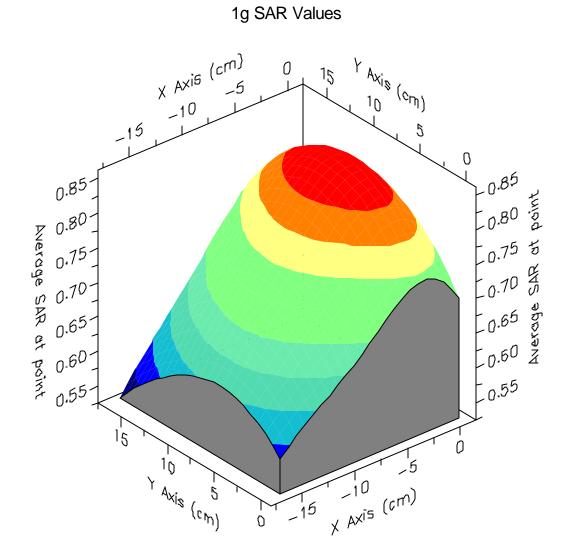


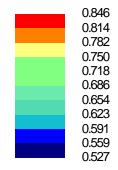


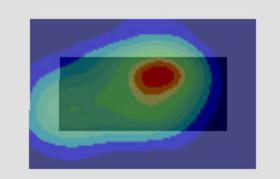
```
SAR Data Report 05041817
              : 18-Apr-05 05:46:05 pm
  Start
  End
              : 18-Apr-05 05:53:26 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC Phone
  Type
  Model Number : 250414
  Serial Number : 1
 Frequency: 1880 MHzTransmit Pwr: 1 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
                : SAM FLAT
  Phantom Name
  Phantom Type : Uniphantom
Tissue Type : Muscle
  Tissue Dielectric : 53.610
  Tissue Conductivity : 1.570
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                        : Muscle
  Tissue Type
  Calibrated Dielectric : 51.810
  Calibrated Conductivity : 1.580
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Probe Offset1.000Conversion Factor5.500
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
 GPRS Mode CH-661
  Body
  CF=4; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.635
  Reading @ End = 0.682
  Power at End
                 = 107.4%
Area Scan - Max Peak SAR Value at x=-9.0 y=8.0 = 0.88 W/kg
Zoom Scan - Max Peak SAR Value at x=-4.0 y=11.0 z=0.0 = 1.60 W/kg
Max 1g SAR at x=-3.0 y=8.0 z=0.0 = 0.85 W/kg
Max 10g SAR at x=-6.0 y=8.0 z=0.0 = 0.47 \text{ W/kg}
```



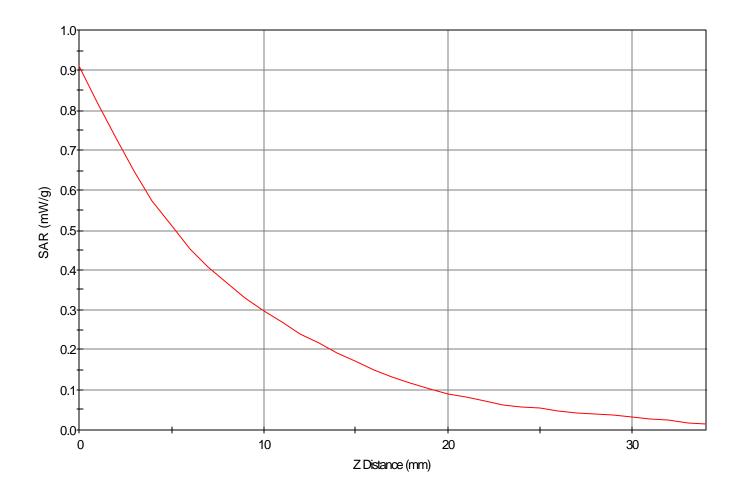
SAR - Z Axis at Hotspot x:-4.0 y:11.0



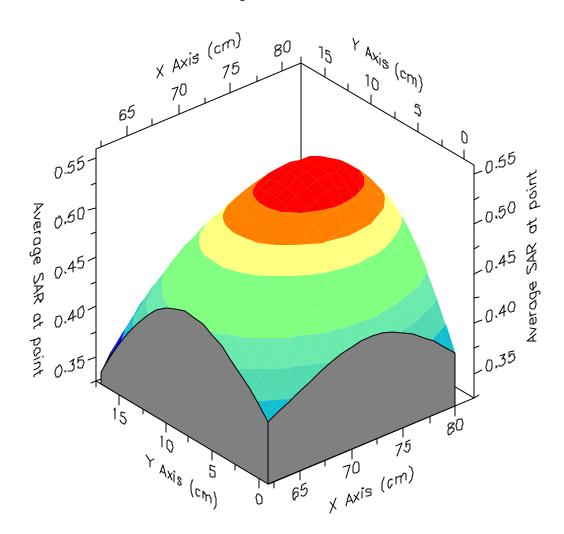


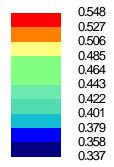


```
SAR Data Report 05052005
             : 20-May-05 02:13:47 pm
  Start
  End
              : 20-May-05 02:20:50 pm
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : NEC BlueTooth Phone
  Type
  Model Number : KMP7N2E1
  Serial Number : 00440000146895
 Frequency: 1850.2 MHzTransmit Pwr: 30 WAntenna Type: Helical
  Antenna Posn. : Fixed
Measurement Data:
  Phantom Name : SAM-RIGHT
  Phantom Type : Right Ear
Tissue Type : Brain
  Tissue Dielectric : 40.610
  Tissue Conductivity : 1.440
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                       : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                         : 1.600 mm
  Probe OIIset1.000Conversion Factor5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
 NEC w/ BlueTooth Mode On
 Right Cheek
  CF=8; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 0.059
  Reading @ End = 0.059
  Power at End
                 = 99.8%
Area Scan - Max Peak SAR Value at x=71.0 y=8.0 = 0.63 W/kg
Zoom Scan - Max Peak SAR Value at x=76.0 y=7.0 z=0.0 = 0.91 W/kg
Max 1g SAR at x=74.0 y=7.0 z=0.0 = 0.55 W/kg
Max 10g SAR at x=72.0 y=8.0 z=0.0 = 0.30 W/kg
```

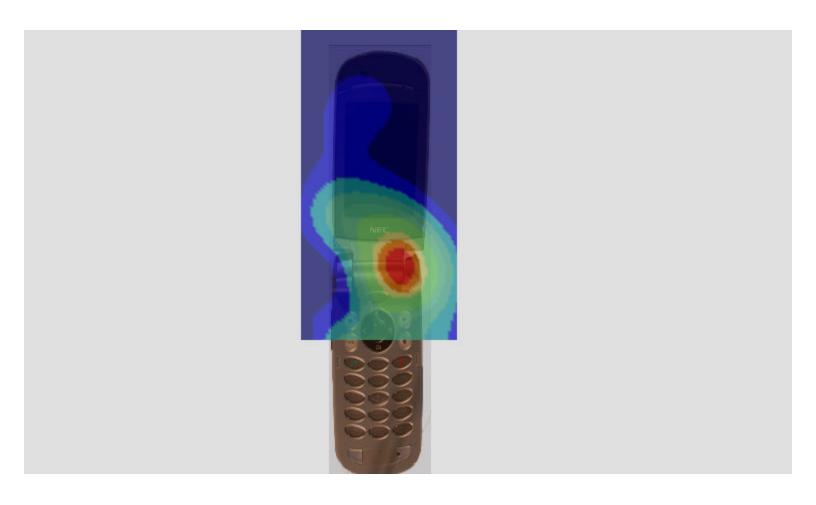


SAR - Z Axis at Hotspot x:76.0 y:7.0



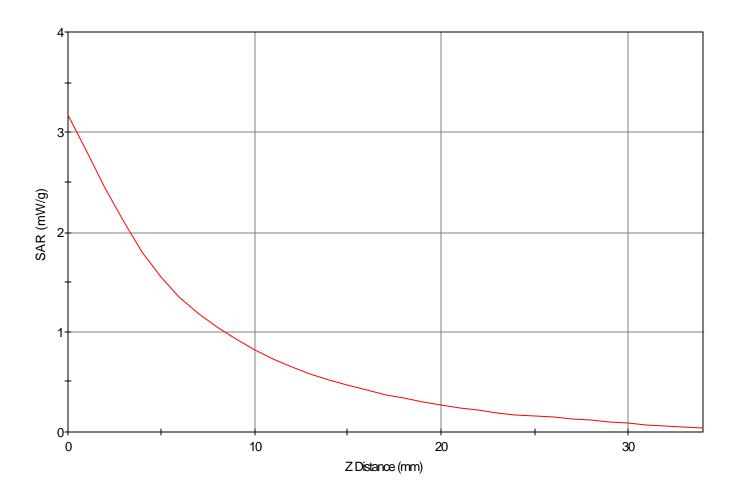


1g SAR Values

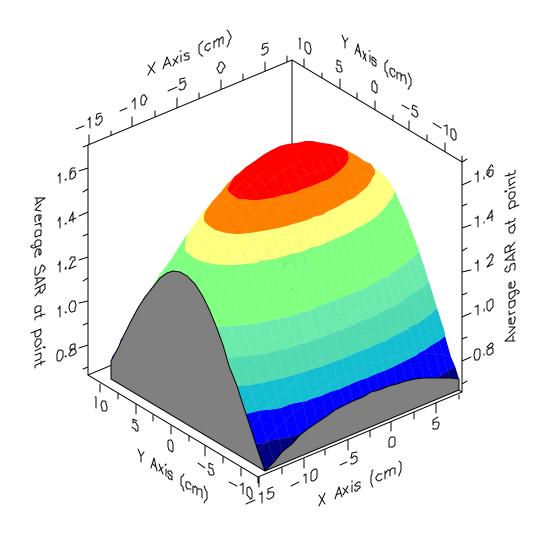


APPENDIX B: DIPOLE VALIDATION

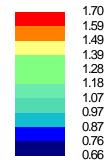
```
SAR Data Report 05032801
             : 18-Apr-05 09:54:41 am
  Start
  End
             : 20-Apr-05 10:01:35 am
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : Verification
  Type
  Model Number : E-020
  Serial Number : PCT005
  Frequency: 1900 MHzTransmit Pwr: 0.040 WAntenna Type: Dipole
  Antenna Posn. : Verification
Measurement Data:
                : SAM-FLAT2
  Phantom Name
  Phantom Type : Uniphantom
Tissue Type : Brain
  Tissue Dielectric : 41.800
  Tissue Conductivity : 1.420
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                       : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                        : 1.600 mm
  Conversion Factor : 5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  1900MHz Verification
  CF=1; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 1.546
  Reading @ End = 1.562
  Power at End = 101.0%
Area Scan - Max Peak SAR Value at x=-3.0 y=-1.0 = 1.76 W/kg
Zoom Scan - Max Peak SAR Value at x=-2.0 y=-1.0 z=0.0 = 3.17 W/kg
Max 1g SAR at x=-2.0 y=0.0 z=0.0 = 1.70 W/kg
Max 10g SAR at x=-2.0 y=-1.0 z=0.0 = 0.82 W/kg
Validation Results at 0.04 W:
Peak Nominal = 2.9, Error: 9.91 %
1g Nominal = 1.6, Error: 6.90 %
10g Nominal = 0.8, Error: 0.29 %
```

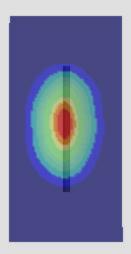


SAR - Z Axis at Hotspot x:-2.0 y:-1.0

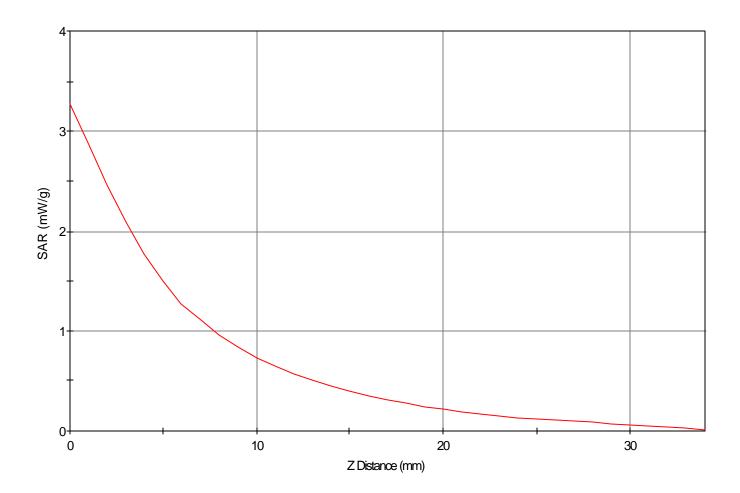


1g SAR Values

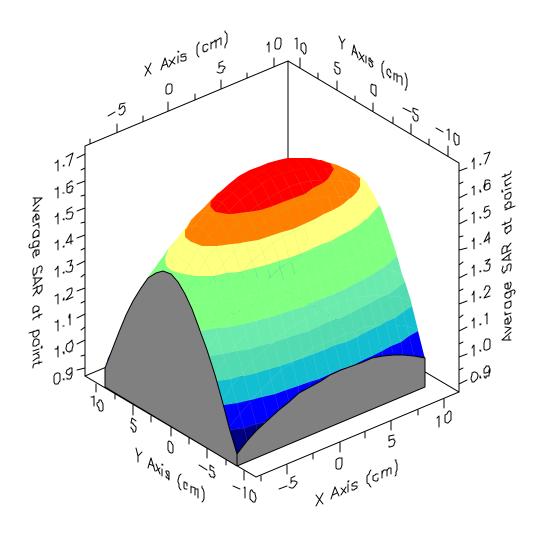


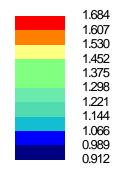


```
SAR Data Report 05052002
             : 20-May-05 09:41:24 am
  Start
  End
             : 20-May-05 09:45:56 am
  Code Version : 4.08
  Robot Version: 4.08
Product Data:
                 : Verification
  Type
  Model Number : E-020
  Serial Number : PCT005
  Frequency: 1900 MHzTransmit Pwr: 0.040 WAntenna Type: Dipole
  Antenna Posn. : Verification
Measurement Data:
  Phantom Name : FLATPHANTOM
  Phantom Type : Uniphantom
Tissue Type : Brain
  Tissue Dielectric : 40.610
  Tissue Conductivity : 1.440
  Tissue Density : 1.000
Robot Name : CRS
Probe Data:
  Probe Name
                       : PCT005
  Probe Type
                       : E Fld Triangle
  Frequency
                       : 1900 MHz
                       : Brain
  Tissue Type
  Calibrated Dielectric : 39.020
  Calibrated Conductivity : 1.370
  Calibrated Density : 1.000
  Probe Offset
                        : 1.600 mm
  Conversion Factor : 5.400
  Amplifier Gains : 20.00 20.00 20.00
Sample:
               6000 Samples/Sec
  Rate:
  Count:
               1000 Samples
  NIDAQ Gain: 5
Comments:
  1900MHz Verification
  CF=1; Amb. Temp= 22.2 'C; Liq. Temp=21.1 'C
Power Drop Test:
  Reading @ start = 1.717
  Reading @ End = 1.698
  Power at End
                = 98.9%
Area Scan - Max Peak SAR Value at x=1.0 y=0.0 = 1.75 W/kg
Zoom Scan - Max Peak SAR Value at x=1.0 y=0.0 z=0.0 = 3.26 W/kg
Max 1g SAR at x=2.0 y=0.0 z=0.0 = 1.68 W/kg
Max 10g SAR at x=2.0 y=0.0 z=0.0 = 0.79 W/kg
Validation Results at 0.04 W:
Peak Nominal = 2.9, Error: 13.17 %
lg Nominal = 1.6, Error: 6.04 %
10g Nominal = 0.8, Error: -3.20 %
```

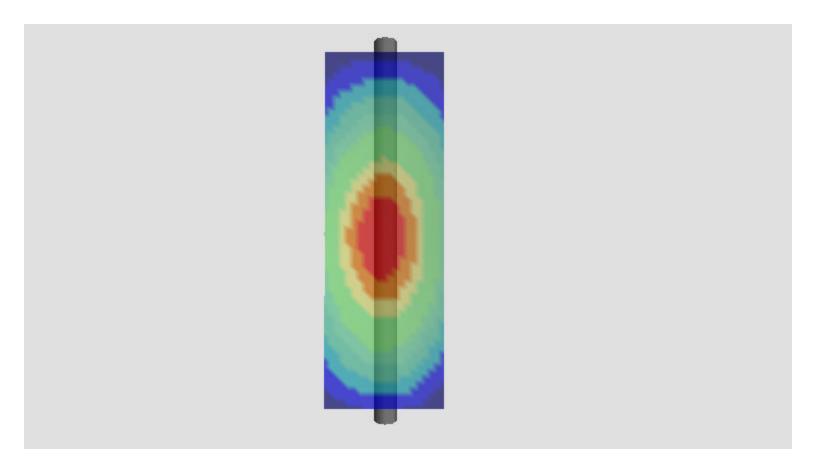


SAR - Z Axis at Hotspot x:1.0 y:0.0





1g SAR Values



APPENDIX C: PROBE CALIBRATION

Probe E-020

SN: PCT005

Manufactured: Calibrated: November 10, 2004 January 17, 2005

Calibrated for the IDX System

PCTEST Calibration Laboratory

Approved By:

Alfred Cirwithian Vice President Engineering

Calibration is performed according to IEEE Std. 1528 - 2003 and all test equipment used is traceable to U.S. NIST.



Calibration Summary

Model: E-020 S/N: PCT005

Tissue Type	Frequency (MHz)	Dielectric Constant \mathcal{E}_r	Conductivity (S/m) σ	Conversion Factor $\gamma_x, \gamma_y, \gamma_z$
Brain	450	44.41	0.88	8.8
Brain	835	40.81	0.87	5.5
Brain	1900	39.02	1.37	5.4
Brain	2100	41.11	1.39	5.25
Muscle	450	57.70	0.96	9.24
Muscle	835	53.66	0.98	5.85
Muscle	1900	51.81	1.58	5.5
Muscle	2100	52.23	1.53	5.3

Frequency	Isotropy		
(MHz)	%	dB	
450	1.23	0.05	
835	2.12	0.09	
1900	6.61	0.28	
2100	7.61	0.32	

Boundary Effect < 2%, 2.5 mm from probe tip to phantom

Diode Compression Point: 120 mV

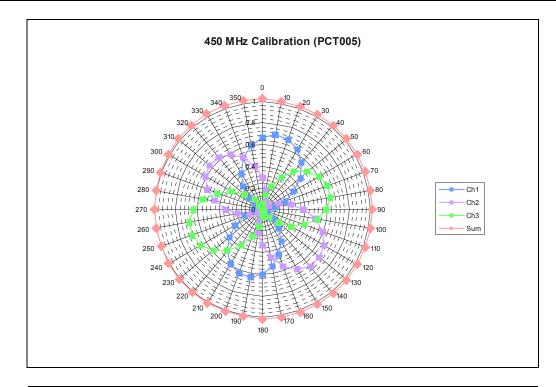
Environmental Conditons:

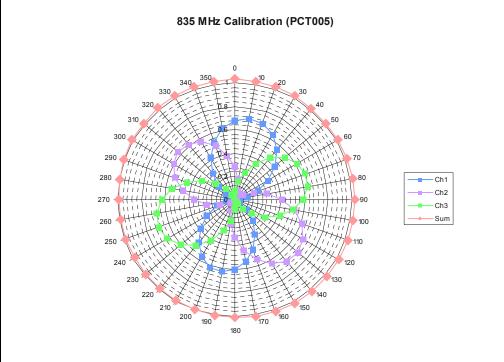
Temperature: 22.6 °C Relative Humidity: 41% Barometer: 101.2 kPa

This probe was calibrated under the IEEE Std 1309-1966, *IEEE Standard for Calibration of Electromagnetic Field Sensors and Probes, Excluding Antennas, from 9 kHz to 40 GHz.*

Calibrated By: <u>I/17/05</u>



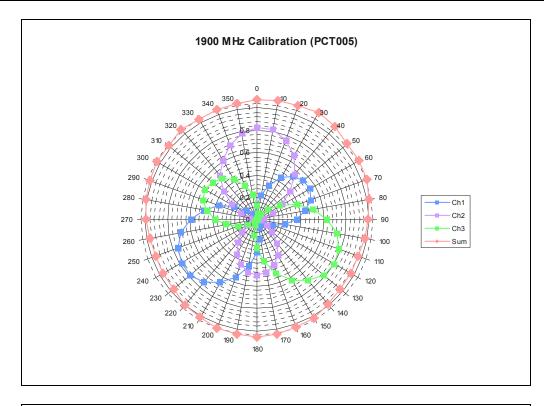


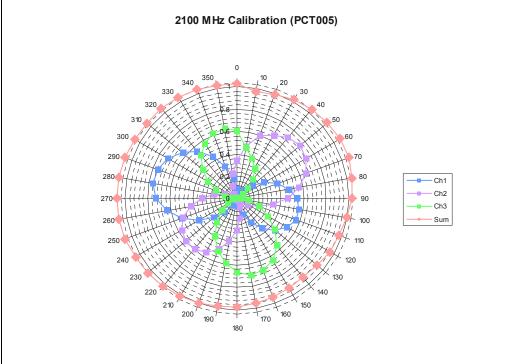


Calibrated By: <u>1</u> Date: 0/06/04

© 2005 PCTEST



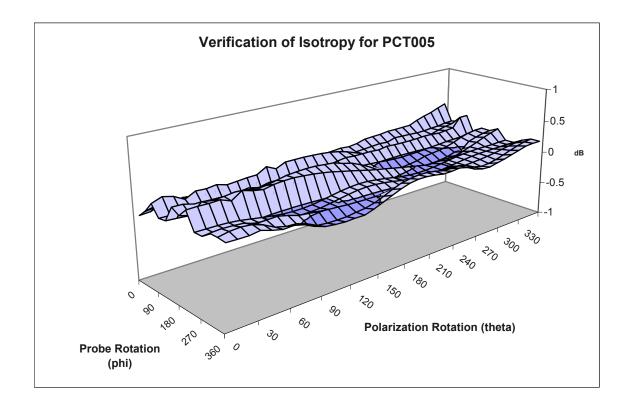




Calibrated By: ____ Date: _____

© 2005 PCTEST

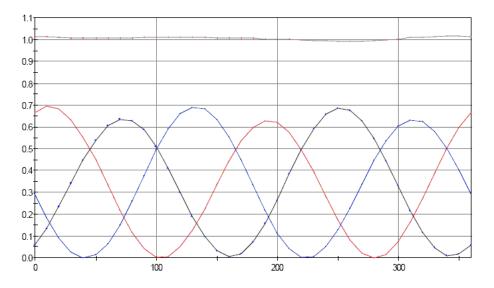


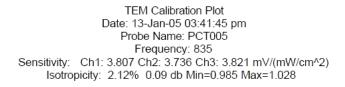


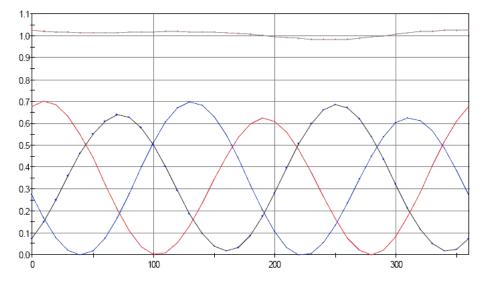
Calibrated By: ____ Date: ____ 0/06/04



TEM Calibration Plot Date: 13-Jan-05 04:03:28 pm Probe Name: PCT005 Frequency: 450 Sensitivity: Ch1: 3.320 Ch2: 3.289 Ch3: 3.267 mV/(mW/cm^2) Isotropicity: 1.23% 0.05 db Min=0.993 Max=1.019

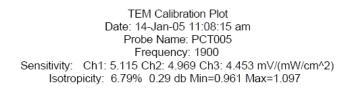


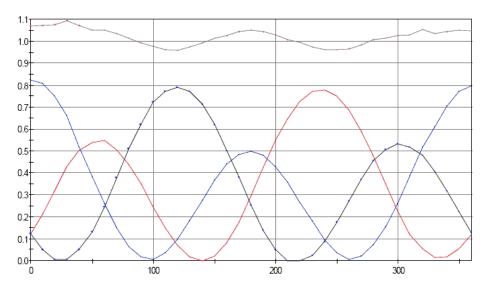


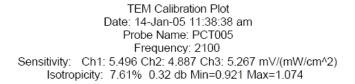


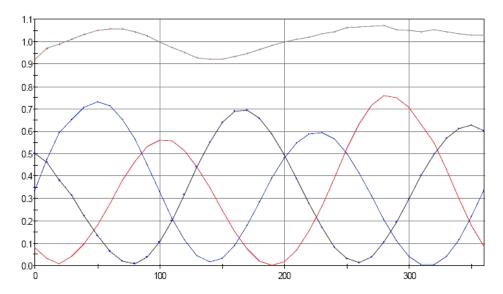
Calibrated By: ____ Date: ____O/_O6/04





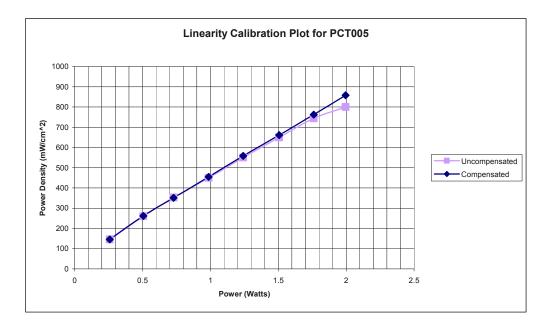






Calibrated By: ____ Date: ____ 0/06/04





Probe Physical Characteristics

Serial Number:	РСТ005
Model:	Е-020
Sensor Offset:	1.56 mm
Sensor Length:	2.5 mm
Tip Enclosure:	Ertalyte
Tip Diameter:	5 mm
Tip Length:	60 mm
Total Length:	290 mm

Calibrated By: _____ Date: _____0/06/04



Test Equipment

The test equipment used during the probe calibration are listed as follows:

EQUIPMENT SPECIFICATIONS					
Туре	Calibration Due	Asset Number/ Serial Number			
CRS Robot F3	February 2005	RAF0134133			
CRS C500C Motion Controller	February 2005	RCB0003303			
CRS Teach Pendant (Joystick)	February 2005	STP0132231			
DELL Computer, Pentium 4 1.6 GHz, Windows 2000 [™]	February 2005	4PJZ111			
Flat SAM Phantom (P-SAM-FLAT)	February 2005	94X-097			
IDX Robot End Effector (EE-103-C)	February 2005	07111223			
IDX Probe Amplifier	February 2005	07111113			
Validation Dipole D835V2	October 2005	PCT441			
Validation Dipole D1900V2	February 2005	PCT512			
Validation Dipole D2450V2	October 2005	PCT641			
HP-778D Dual-Directional Coupler (0.1 ~ 2.0 GHz)	November 2005	PCT664			
MicroCircuits Directional Coupler (4.0 ~ 8.0 GHz)	November 2005	PE2204-6			
Amplifier Research 5S1G4 Power Amp	January 2005	PCT540			
IFI T184-10 Power Amplifier (4.0 ~ 18.0 GHz)	December 2005	5957			
HP-8241A (250kHz ~ 20 GHz) Signal Generator	December 2005	88934			
HP-8753E (30kHz ~ 6GHz) Network Analyzer	January 2006	PCT552			
Rohde & Schwarz Power Meter NRVS 1020.1809.02	January 2006	835360/079			
Rohde & Schwarz Power Sensor NRV-Z53 858.0500.02	April 2005	846076/007			
HP85070B Dielectric Probe Kit	January 2005	PCT501			
IFI CC110EXX TEM Cell (DC to 2000 MHz)	January 2006	PCT498			
EMCO 3115 Horn Antenna (2.0 ~ 18.0 GHz)	August 2005	PCT496			
Guildline 5150 Precision Dual-Thermometer	November 2005	66145			

Calibrated By: ____ Date: _____