

FCC ID: GMLRH-25 Test Report #: 03-EM-0042



Accredited Laboratory Certificate Number: 1819-01

SAR Compliance Test Report

03-EM-0042 11 August, 2003 Test report no.: Date of report: Number of pages: Contact person: Nerina Walton Nerina Walton Responsible test engineer:

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Tested devices: GMLRH-25, Model 6560

BLD-3, HS-5, HS-2R

Testing has been carried out in accordance with: IEEE Std 1528-200X, Draft CBD 1.0 - April 4, 2002

Draft Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques

FCC Supplement C Edition, 01-01

Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency

Electromagnetic Fields

The documentation of the testing performed on the tested devices is archived for 15 years at **Documentation:**

Test & Certification Center (TCC) Dallas

Test results: The tested device complies with the requirements in respect of all parameters subject to

the test.

The test results and statements relate only to the items tested. The test report shall not be

reproduced except in full, without written approval of the laboratory.

11 August, 2003 Date and signatures:

For the contents:

Alan C. Ewing TCC Line Manager Mark Severson **Test Engineer**



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1. QUALITY SYSTEM

The quality system in place for TCC-Dallas conforms to ISO/IEC 17025 and has been audited to the standard by A2LA (American Association of Laboratory Accreditation). Appendix D of this report contains the scope of accreditation for A2LA. TCC – Dallas has also been audited using the ISO 9000 Quality System, as part of Nokia Mobile Phones, Inc., by ABS (American Bureau of Shipping) Quality Evaluations Inc.

TCC-Dallas is a recognized laboratory with the Federal Communications Commission in filing applications for Certification under Parts 15 and 18, Registration Number 100060, and Industry Canada, Registration Number IC 661.



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2. SUMMARY FOR SAR TEST REPORT

Date of test	7 July - 15 July 2003
Contact person	Nerina Walton
Test plan referred to	-
FCC ID	GMLRH-25
Type, SN, HW and SW numbers of tested device	Type: RH-25
	ESN 07201996746, HW: 3200f
	ESN: 07201996841, HW: 3210f
	SW: 0.22
Accessories used in testing	BLD-3 Battery, HS-5 and HS-2R Headsets
Notes	-
Document code	03-EM-0042
Responsible test engineer	N. Walton
Measurement performed by	E.Parish / J. Love / C. Bertz

2.1 Maximum Results Found during SAR Evaluation

The equipment is deemed to fulfill the requirements if the measured values are less than or equal to the limit.

2.1.1 Head Configuration

Mode	Ch / f (MHz)	Power (dBm)	Position	Limit (mW/g)	Measured (mW/g)	Result
AMPS	991 / 824.04	24.9	Left Touch Position	1.6	1.13	PASSED
TDMA 800	799 / 848.97	27.8	Left Touch Position	1.6	0.74	PASSED
TDMA 1900	2 / 1850.04	26.9	Left Tilt Position	1.6	1.14	PASSED

2.1.2 Body Worn Configuration

Mode	Ch / f (MHz)	Power (dBm)	Position	Limit (mW/g)	Measured (mW/g)	Result
AMPS	991 / 824.04	24.9	Flat – Back of Phone with 15mm Measurement Distance	1.6	1.02	PASSED
TDMA 800	384 / 836.52	27.7	Flat – Back of Phone with 15mm Measurement Distance	1.6	0.61	PASSED
TDMA 1900	2 / 1850.04	26.9	Flat - Back of Phone with 15mm Measurement Distance	1.6	0.96	PASSED

2.1.3 Measurement Uncertainty

Combined Standard Uncertainty	± 14.5%
Expanded Standard Uncertainty (k=2)	± 29.1%



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3. DESCRIPTION OF TESTED DEVICE

Device category	Portable device					
Exposure environment	Uncontrolled exposure	Uncontrolled exposure				
Unit type	Prototype unit					
Case type	Fixed case					
Mode of Operation	AMPS	TDMA 800	TDMA 1900			
Maximum Device Rating	Power Class III	Power Class III	Power Class III			
Modulation Mode	Frequency Modulation (FM)	Quadrature Phase Shift Keying	Quadrature Phase Shift Keying			
Duty Cycle	1	1/3	1/3			
Transmitter Frequency Range (MHz)	824.04 - 848.97	824.04 - 848.97	1850.04 – 1909.92			

3.1 Picture of Phone

The tested device, GMLRH-25 is shown below: -



3.2 Description of the Antenna

Туре	Internal integrated antenna			
Location	Inside the back cover, near the top of the device			

3.3 Battery Options

There is one battery option available for the tested device, a BLD-3. The BLD-3 battery is a rechargeable Li-ion.

3.4 Body Worn Operation

Body SAR was evaluated with a separation distance of 15mm and with the HS-5 and HS-2R Headsets connected.



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4. **TEST CONDITIONS**

4.1 **Ambient Conditions**

Ambient temperature (°C)	22±2
Tissue simulating liquid temperature (°C)	20±2
Humidity (%)	43

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RF characteristics of the test site 4.2

Tests were performed in a fully enclosed RF shielded environment.

4.3 Test Signal, Frequencies, and Output Power

The device was controlled by using a radio tester. Communication between the device and the tester was established by air link.

Measurements were performed on the lowest, middle and highest channels of the operating band.

The phone was set to maximum power level during all tests and at the beginning of each test the battery was fully charged.

The DASY3 system measures power drift during SAR testing by comparing e-field in the same location at the beginning and at the end of measurement. These records were used to monitor stability of power output.



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5. DESCRIPTION OF THE TEST EQUIPMENT

The measurements were performed with an automated near-field scanning system, DASY3, manufactured by Schmid & Partner Engineering AG (SPEAG) in Switzerland.

Test Equipment	Model	NMP #	Serial Number	Due Date
DASY3, Data Acquisition	DAE V1	2292	389	07/03
E-field Probe	ET3DV6	2954	1504	07/03
Dipole Validation Kit	D835V2	3745	486	05/04
Dipole Validation Kit	D835V2	3453	455	07/04
Dipole Validation Kit	D1900V2	3457	5D004	07/03

E-field probe and dipole validation kit calibration records are presented in Appendix D.

Additional equipment (required for validation).

Test Equipment	Model	NMP #	Serial Number	Due Date
Signal Generator	HP 8648C	2667	3847U02985	11/03
Amplifier	AR 5S1G4	0188	25583	-
Coupler	AR DC7144	2057	25304	-
Power Meter	Boonton 4232A	0147	26001	07/03
Power Sensor	Boonton 51015	0163	31143	07/03
Power Sensor	Boonton 51015	0164	31144	07/03
Thermometer	Omega CL27	3392	T-228448	07/03
Network Analyzer	Agilent 8753ES	2605	US39174932	01/04
Dielectric Probe Kit	Agilent 85070C	3089	US99360172	-

The calibration interval on all items listed above can be obtained from the Engineering Services Group within NMP, Product Creation – Dallas. Where relevant, measuring equipment is subjected to in–service checks between testing. TCC – Dallas shall notify clients promptly, in writing, of identification of defective measuring equipment that casts doubt on the validity of results given in this report.



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5.1 System Accuracy Verification

The manufacturer calibrates the probes annually. Dielectric parameters of the simulating liquids are measured using an Agilent 85070C dielectric probe kit and an Agilent 8753ES network analyzer.

SAR measurements of the tested device were performed within 24 hours of system accuracy verification, which was done using the dipole validation kit.

The dipole antenna's, which are manufactured by Schmid & Partner Engineering AG, are matched to be used near a flat phantom filled with tissue simulating solution. Length of the 835 MHz dipole is 161mm with an overall height of 330mm; length of the 1900MHz dipole is 68mm with an overall height of 300mm. A specific distance holder is used in the positioning to ensure correct spacing between the phantom and the dipole.

A power level of 250 mW was supplied to the dipole antenna placed under the flat section of the SAM phantom. Validation results are in the table below and a print out of the validation tests are presented in Appendix B. All the measured parameters were within specification.

5.1.1 Head Tissue

	f (MHz)	f Description		SAR	Dielectric l	Parameters	Temp
Tissue		(Date Measured)	(W/kg), 1g	ε _r	σ (S/m)	(°C)	
		07-July-03	10.24	42.1	0.92	21.5	
	835	08-July-03	9.56	41.0	0.91	21.3	
Head		10-July-03	10.32	41.7	0.92	21.1	
		14-July-03	10.24	40.9	0.92	21.5	
		Reference Result	11.4	41.5	0.97	N/A	
		07-July-03	44.8	40.2	1.47	21.6	
Head	1900	11-July-03	42.0	40.3	1.50	20.1	
		Reference Result	44.0	39.8	1.46	N/A	



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5.1.2 Muscle Tissue

	f (MHz)	f Description		Dielectric l	Parameters	Temp
Tissue		(Date Measured)	(W/kg), 1g	ε _r	σ (S/m)	(°C)
		08-July-03	9.84	55.52	0.96	21.6
	835	09-July-03	9.88	55.99	0.96	21.6
Muscle		10-July-03	10.0	54.83	0.96	21.8
		14-July-03	10.44	55.44	0.97	21.7
		Reference Result	10.1	55.3	0.95	21.6 21.6 21.8
	scle 1900	09-July-03	41.2	54.17	1.50	19.6
Muscle		15-July-03	40.4	54.10	1.51	19.6
		Reference Result	44.0	54.4	1.57	N/A



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5.2 Tissue Simulants

All dielectric parameters of tissue simulants were measured within 24 hours of SAR measurements. The depth of the tissue simulant in the ear reference point of the phantom was $15\text{cm} \pm 5\text{mm}$ during all tests. Volume for each tissue simulant was 27 litres.

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5.2.1 Head Tissue Simulant

The composition of the brain tissue simulating liquid for 835 MHz is: -

51.07% De-Ionized Water

47.31% Sugar 1.15% Salt 0.23% HEC

0.24% Bactericide

f	Description	Dielectric P	Temp (°C)	
(MHz)	(Date Measured)	ϵ_{r}	σ (S/m)	
	07-July-03	42.0	0.93	21.5
	08-July-03	41.0	0.91	21.3
836.52	10-July-03	41.7	0.93	21.1
	14-July-03	40.9	0.92	21.5
	Recommended Values	41.5	0.90	N/A

The composition of the brain tissue simulating liquid for 1900 MHz is: -

44.91% 2-(2-butoxyethoxy) Ethanol

54.88% De-Ionized Water

0.21% Salt

f	Description	Dielectric P	Temp (°C)	
(MHz)		$\mathbf{\epsilon}_{r}$	σ (S/m)	
	07-July-03	40.3	1.45	21.6
1880	11-July-03	40.3	1.48	20.1
	Recommended Values	40.0	1.40	N/A

Recommended values are adopted from OET Bulletin 65 (97-01) Supplement C (01-01).



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5.2.2 Muscle Tissue Simulant

The composition of the muscle tissue simulating liquid for 835 MHz is: -

65.45% De-Ionized Water

34.31% Sugar 0.62% Salt 0.10% Bactericide

f	Description	Dielectric P	Temp (°C)	
(MHz)	(Date Measured)	$\mathbf{\epsilon}_{r}$	σ (S/m)	
	08-July-03	55.51	0.96	21.6
	09-July-03	55.98	0.96	21.6
836.52	10-July-03	54.82	0.96	21.8
	14-July-03	55.38	0.97	21.7
	Recommended Values	55.2	0.97	N/A

The composition of the muscle tissue simulating liquid for 1900 MHz is: -

69.02% De-Ionized Water

30.76% Diethylene Glycol Monobutyl Ether

0.22% Salt

f	Description	Dielectric P	Temp (°C)	
(MHz)	(Date Measured)	$\mathbf{\epsilon}_{r}$	σ (S/m)	
	09-July-03	54.27	1.48	19.6
1880	15-July-03	54.22	1.49	19.6
	Recommended Values	53.3	1.52	N/A

Recommended values are adopted from OET Bulletin 65 (97-01) Supplement C (01-01).



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5.3 Phantoms

"SAM v4.0" phantom", manufactured by SPEAG, was used during the measurement. It has a fiberglass shell integrated into a wooden table. The shape of the shell corresponds to the phantom defined by SCC34–SC2. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. Reference markings



on the phantom allow the complete set-up of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

The thickness of phantom shell is 2 mm except for the ear, where an integrated ear spacer provides a 6 mm spacing from the tissue boundary. Manufacturer reports tolerance in shell thickness to be ± 0.1 mm.

5.4 Isotropic E-Field Probe ET3DV6

Construction Symmetrical design with triangular core

Built-in optical fiber for surface detection system

Built-in shielding against static charges

PEEK enclosure material (resistant to organic solvents, e.g., glycol ether)

Calibration Calibration certificate in Appendix D

Frequency 10 MHz to 3 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 3 GHz)

Optical Surface ± 0.2 mm repeatability in air and clear liquids over diffuse reflecting

Detection surfaces

Directivity \pm 0.2 dB in HSL (rotation around probe axis)

 \pm 0.4 dB in HSL (rotation normal to probe axis)

Dynamic Range $5 \mu W/q \text{ to} > 100 \text{ mW/q}$; Linearity: $\pm 0.2 \text{ dB}$

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 phones

Fast automatic scanning in arbitrary phantoms





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6. DESCRIPTION OF THE TEST PROCEDURE

6.1 Test Positions

The device was placed into a holder using a special positioning tool, which aligns the bottom of the device with the holder and ensures that holder contacts only to the sides of the device. After positioning is done, the tool is removed. This method provides standard positioning and separation, and also ensures free space for antenna.

Device holder was provided by SPEAG together with the DASY3.

6.1.1 Against Phantom Head

Measurements were made on both the "left hand" and "right hand" side of the phantom.

The device was positioned against phantom according to OET Bulletin 65 (97-01) Supplement C (01-01). Definitions of terms used in aligning the device to a head phantom are available in IEEE Std 1528-200X "Draft Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

6.1.1.1 Initial Ear Position

The device was initially positioned with the earpiece region pressed against the ear spacer of a head phantom parallel to the "Neck-Front" line defined along the base of the ear spacer that contains the "ear reference point". The "test device reference point" is aligned to the "ear reference point" on the head phantom and the "vertical centerline" is aligned to the "phantom reference plane".

6.1.1.2 Touch Position

"Initial ear position" alignments are maintained and the device is brought toward the mouth of the head phantom by pivoting along the "Neck-Front" line until any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom or when any portion of a foldout, sliding or similar keypad cover opened to its intended self-adjusting normal use position is in contact with the cheek or mouth of the phantom.

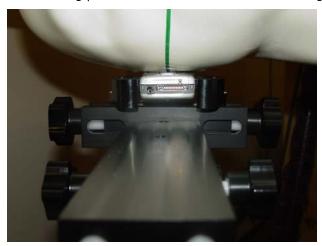


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The following picture shows the tested device in the right touch position:



6.1.1.3 Tilt Position

In the "Touch Position", if the earpiece of the device is not in full contact with the phantom's ear spacer and the peak SAR location for the "touch position" is located at the ear spacer region or corresponds to the earpiece region of the handset, the device is returned to the "initial ear position" by rotating it away from the mouth until the earpiece is in full contact with the ear spacer. Otherwise, the device is moved away from the cheek perpendicular to the line passes through both "ear reference points" for approximate 2–3 cm. While it is in this position, the device is tilted away from the mouth with respect to the "test device reference point" by 15°. After the tilt, it is then moved back toward the head perpendicular to the line passes through both "ear reference points" until the device touches the phantom or the ear spacer. If the antenna touches the head first, the positioning process is repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously.

The following picture shows the tested device in the right tilt position:





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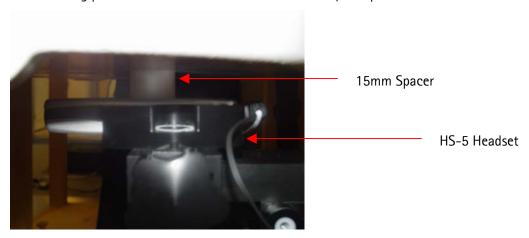


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6.1.2 Body Worn Configuration

Body SAR measurements were performed with the antenna facing towards the flat part of the phantom with a separation distance of 15mm and with the HS-5 and HS-2R Headsets connected.

The following picture shows the tested device in the body test position: -



Note: the 15mm spacer was removed before the SAR measurement.

6.2 Scan Procedures

First coarse scans are used for quick determination of the field distribution. Next a cube scan, 5x5x7 points; spacing between each point 8x8x5 mm, is performed around the highest E-field value to determine the averaged SAR-distribution over 1g.

6.3 SAR Averaging Methods

The maximum SAR value is averaged over its volume using interpolation and extrapolation.

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot" -condition [W. Gander, Computermathematik, p. 141–150] (x, y and z -directions) [Numerical Recipes in C, Second Edition, p 123].

The extrapolation is based on least square algorithm [W. Gander, Computermathematik, p.168-180]. Through the points in the first 30 mm in all z-axis, polynomials of order four are calculated. This polynomial is then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1mm from one another.



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7. MEASUREMENT UNCERTAINTY

7.1 Description of Individual Measurement Uncertainty

7.1.1 Assessment Uncertainty

а	ь	c	d	e = f(d,k)	F	h = cxf/e	k
Uncertainty Component	Section in P1528.	Tol. (%)	Prob. Dist.	Div.	C _i	<i>u</i> _i (%)	V _i
Measurement System							
Probe Calibration	E2.1	±4.8	N	1	1	±4.8	∞
Axial Isotropy	E2.2	±4.7	R	√3	(1-cp) ^{1/2}	±1.9	∞
Hemispherical Isotropy	E2.2	±9.6	R	√3	$\sqrt{c_p}$	±3.9	8
Boundary Effect	E2.3	±8.3	R	√3	1	±4.8	8
Linearity	E2.4	±4.7	R	√3	1	±2.7	∞
System Detection Limits	E2.5	±1.0	R	√3	1	±0.6	∞
Readout Electronics	E2.6	±1.0	N	1	1	±1.0	∞
Response Time	E2.7	±0.8	R	√3	1	±0.5	∞
Integration Time	E2.8	±2.6	R	√3	1	±1.5	∞
RF Ambient Conditions - Noise	E6.1	±3.0	R	√3	1	±1.7	∞
RF Ambient Conditions - Reflections	E6.1	±3.0	R	√3	1	±1.7	∞
Probe Positioner Mechanical Tolerance	E6.2	±0.4	R	√3	1	±0.2	∞
Probe Positioning with respect to Phantom Shell	E6.3	±2.9	R	√3	1	±1.7	∞
Extrapolation, interpolation and Integration Algorithms for Max. SAR Evaluation	E5.2	±3.9	R	√3	1	±2.3	~
Test sample Related							
Test Sample Positioning	E4.2.1	±6.0	N	1	1	±6.0	11
Device Holder Uncertainty	E4.1.1	±5.0	N	1	1	±5.0	7
Output Power Variation – SAR drift measurement	6.6.3	±10.0	R	√3	1	±5.8	8
Phantom and Tissue Parameters							
Phantom Uncertainty (shape and thickness tolerances)	E3.1	±4.0	R	√3	1	±2.3	8
Liquid Conductivity Target - tolerance	E3.2	±5.0	R	√3	0.64	±1.8	∞
Liquid Conductivity - measurement uncertainty	E3.3	±5.5	N	1	0.64	±3.5	5



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а	ь	c	d	e = f(d,k)	F	h = cxf/e	k
Uncertainty	Section	Tol.	Prob.	D:	c _i	u _i	V _i
Component	in P1528.	(%)	Dist.	Div.		(%)	
Measurement System							
Liquid Permittivity Target tolerance	E3.2	±5.0	R	√3	0.6	±1.7	∞
Liquid Permittivity - measurement uncertainty	E3.3	±2.9	N	1	0.6	±1.7	5
Combined Standard Uncertainty			RSS			±14.5	208
Expanded Uncertainty (95% CONFIDENCE INTERVAL)						±29.1	



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8. RESULTS

Corresponding SAR distribution print outs of maximum results in every operating mode and position are shown in Appendix C; z-axis plots of the maximum measurement results in head and body worn configurations are also included. The SAR distributions are substantially similar or equivalent to the plots submitted, regardless of used channel in each mode and position unless otherwise presented.

Note: the results recorded in the following tables for head and body are the highest values measured from the two HWID's that were tested.

8.1 Head Configuration

	Channel/		SAR, a	veraged	ver 1g (mW/g)	
Mode	f (MHz)	Power (dBm)	Left-	hand	Right	-hand
	/ (101112)		Touch	Tilt	Touch	Tilt
	991 / 824.04	24.9	1.13	0.91	1.06	0.73
AMPS	384 / 836.52	25.0	1.07	0.88	1.07	0.74
	799 / 848.97	24.9	1.03	0.78	0.92	0.65

	Channel/ Power -		SAR, averaged over 1g (mW/g)			
Mode	f (MHz)	•	Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
	991 / 824.04	27.7	0.66	0.53	0.67	0.47
TDMA 800	384 / 836.52	27.7	0.71	0.54	0.65	0.45
	799 / 848.97	27.8	0.74	0.59	0.68	0.45

	Channel/	Power	SAR, a	veraged	over 1g (r	nW/g)
Mode	f(MHz)	(dBm)	Left-hand		Right-hand	
			Touch	Tilt	Touch	Tilt
TDMA 1900	2 / 1850.04	26.9	0.99	1.14	0.73	1.02
	1000 / 1880.00	26.3	0.96	1.11	0.63	1.00
	1998 / 1909.92	26.5	0.93	1.07	0.61	1.00



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8.2 Body Worn Configuration

Body SAR measurements were performed with the HS-5 and HS-2R Headsets connected. Measurements with HS-5 gave higher SAR results and those are reported below.

Mode	Channel/	Power	SAR, averaged over 1g (mW/g)
Wiouc	f (MHz)	(dBm)	HS-5
	991 / 824.04	24.9	1.02
AMPS	384 / 836.52	25.0	0.88
	799 / 848.97	24.9	0.70

Mode	Channel/ f (MHz)	Power (dBm)	SAR, averaged over 1g (mW/g)
	/ (IVITZ)	(ubiii)	HS-5
	991 / 824.04	27.7	0.60
TDMA 800	384 / 836.52	27.7	0.61
	799 / 848.97	27.8	0.44

Mode	Channel/	Power	SAR, averaged over 1g (mW/g)	
Wiouc	f(MHz) (dBm)		HS-5	
	2 / 1850.04	26.9	0.96	
TDMA 1900	1000 / 1880.00	26.3	0.79	
	1998 / 1909.92	26.5	0.69	



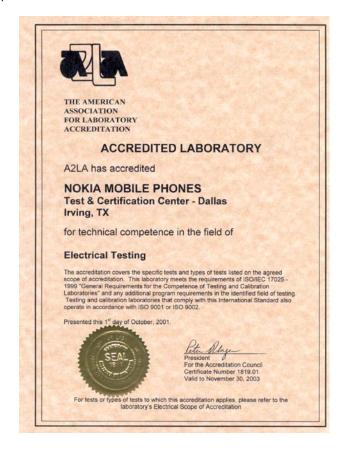
FCC ID: GMLRH-25 Test Report #: 03-EM-0042



Accredited Laboratory Certificate Number: 1819-01

APPENDIX A: SCOPE OF ACCREDITATION FOR A2LA

TCC-Dallas is accredited by the American Association for Laboratory Accreditation (A2LA) as shown in the scope below:

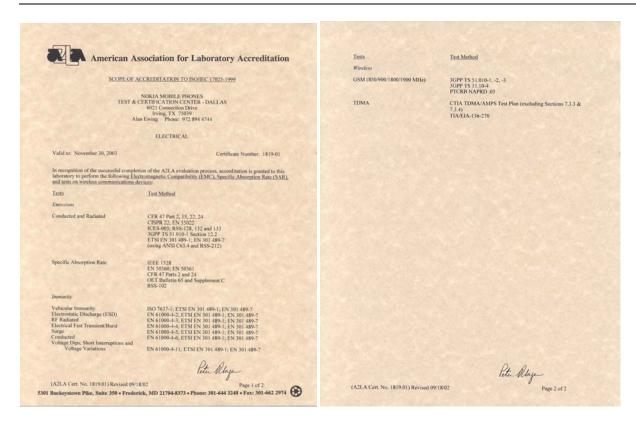




FCC ID: GMLRH-25 Test Report #: 03-EM-0042



Accredited Laboratory Certificate Number: 1819-01



"This laboratory is accredited by the American Association for Laboratory Accreditation (A2LA) and the results shown in this report have been determined to be in accordance with the laboratory's terms of accreditation unless stated otherwise in the report."

Should this report contain any data for tests for which we are not accredited, such data would not be covered by this laboratory's A2LA accreditation