CERTIFICATE OF COMPLIANCE SAR EVALUATION

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Model No.:

19-1207

EUT Type:

Portable UHF FM Radio Transceiver

Applicant Information:

Fort Worth, TX 76102-2802

RADIOSHACK CORPORATION

Attn: Dwayne Campbell, Manager

100 Throckmorton Street, Suite 1300

Engineering & Regulatory Affairs

Modulation:

FM (UHF Band)

Tx Frequency Range:

461.0375 - 469.5625 MHz

Max. RF Output Power:

1.58 Watts / 32dBm (conducted)

No. of Channels:

FCC Rule Part(s):

2.1093, ET Docket 96-326

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

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

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

Shawn McMillen General Manager

Celltech Research Inc.

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1.0 INTRODUCTION

This measurement report shows compliance of the RADIOSHACK Model: 19-1207 Portable UHF FM Radio Transceiver with the regulations and procedures specified in FCC Part 2.1093, ET Docket 96-326 Rules for mobile and portable devices. The test procedures, as described in American National Standards Institute C95.1-1992 (1), FCC OET Bulletin 65–1997 were employed. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the evaluation, equipment used, and the various provisions of the rules are included within this test report.

2.0 DESCRIPTION of Equipment Under Test (EUT)

D 1. D4(a)	FCC 2.1093;	Modulation	FM (UHF Band)
Rule Part(s)	ET Docket 96.326	No. of Channels	2
EUT Type	Portable UHF FM Radio Transceiver	Tx Frequency Range (MHz)	461.0375 - 469.5625
Model No.(s)	19-1207	Max. RF Output Power	1.58 Watts / 32dBm (conducted power)
Serial No.	Pre-production	Power Supply	NiMH Rechargeable Battery (6V 1400 mAh)
Antenna Type	Fixed Stubby	Antenna Length	72 mm











Front of EUT

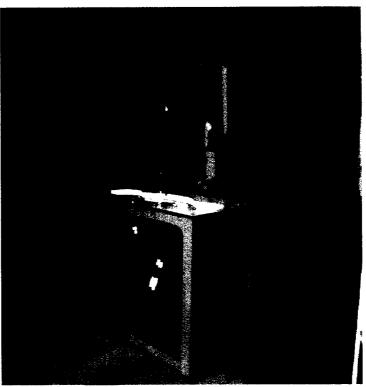
Left Side of EUT Right Side of EUT

Rear of EUT

EUT with ear/mic

3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASYTM) manufactured by Schmid & Partner Engineering AG (SPEAGTM) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, and the generic twin phantom containing brain or muscle equivalent material (see Figure 6). The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card. The DAE3 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.



DASY3 SAR Measurement System

4.0 MEASUREMENT SUMMARY

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

Face-Held SAR Measurements

Frequency (MHz)	Channel	Mode	Max. Conducted Power (dBm)	Antenna Position	Separation Distance (cm)		SAR (w/kg)
461.0375	Low	FM	32.0	Fixed	4.0	0.563	0.2815 (50% duty cycle)
469.5625	High	FM	32.0	Fixed	4.0	0.561	0.2805 (50% duty cycle)
Mixture Type: Brain Dielectric Constant: 48.9 Conductivity: 0.61			Spatial l	Peak Uncom	C95.1 1992 - S trolled Exposu 5 W/kg (averag	re/General	Population

Notes: 1. All modes of operation were investigated and the worst-case SAR levels are reported.

2. The SAR values found were below the maximum limit of 1.6 w/kg. The worst-case SAR value found was 0.2815 w/kg (50% duty cycle).

Body-Worn SAR Measurements

Frequency (MHz)	Channel	Mode	Max. Conducted Power (dBm)	Antenna Position	Separation Distance (cm)		SAR (w/kg)
461.0375	Low	FM	32.0	Fixed	0.8	2.52	1.26 (50% duty cycle)
469.5625	High	FM	32.0	Fixed	0.8	1.99	0.995 (50% duty cycle)
Mixture Type: Muscle Dielectric Constant: 57.5 Conductivity: 0.84			Spatial 1	Peak Uncont	C95.1 1992 - S trolled Exposu W/kg (averag	re/Genera	l Population

Notes: 1. All modes of operation were investigated and the worst-case SAR levels are reported.

- 2. The SAR values found were below the maximum limit of 1.6 w/kg. The worst-case SAR value found was 1.26 w/kg (50% duty cycle).
- 3. The EUT was tested for body-worn SAR using the supplied belt-clip providing a 0.8cm separation distance between the EUT and the surface of the planar phantom.

5.0 SAR SAFETY LIMITS

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

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

6.0 DETAILS OF SAR EVALUATION

The RADIOSHACK Model: 19-1207 Portable UHF FM Radio Transceiver was found to be compliant for localized specific absorption rate (SAR) based on the following test provisions and conditions:

- 1) The EUT was tested in a face-held configuration with the front of the device placed parallel to and at a nominal distance of 40mm from the outer surface of the planar phantom.
- 2) The EUT was tested in a body-worn configuration with the rear of the device placed parallel to the surface of the planar phantom, with the attached belt-clip touching the outer surface of the planar phantom, and providing a 0.8cm separation distance between the EUT and the outer surface of the planar phantom.
- 3) The EUT was evaluated for SAR at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimize drift.
- 4) The device was keyed to operate continuously in the transmit mode for the duration of the
- 5) The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the device and its antenna. This location was then related to a phantom that possesses human like facial attributes. The hot spot location of the EUT occurred just below the mounting point of the antenna. In a normal operating position this places the hotspot just below the left eye. In the absence of nose and lips, this region of the face is fairly planar. Therefore the use of the planar section of the phantom is warranted. The distance of 40mm from the antenna to the planar region of the phantom is large enough that does not create unrealistic loading of the antenna.
- 6) The EUT was tested with a fully charged battery.

7.0 EVALUATION PROCEDURES

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

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

8.0 SYSTEM VALIDATION

Prior to the assessment, the system was verified in the planar region of the phantom. For devices operating below 1GHz, an 835MHz dipole or 900MHz was used, depending on the operating frequency of the EUT. For devices operating above 1GHz, an 1800MHz dipole was used. A forward power of 250mW was applied to the dipole and system was verified to a tolerance of \pm 5%. Following the validation, the fluid remained or was changed depending on the particular part of the body being evaluated. The applicable verifications are as follows (see Appendix B for validation test plot):

Dipole Validation Kit	Target SAR 1g (w/kg)	Measured SAR 1g (w/kg)
D835V2	2.06	2.03

9.0 SIMULATED TISSUES

The brain and muscle mixtures consist of a viscous gel using hydroxethylcellullose (HEC) gelling agent and saline solution. Preservation with a bacteriacide is added and visual inspection is made to ensure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the tissue.

	FREQUENCY			
INGREDIENT	(450MHz Brain)	(450MHz Muscle)		
Water	42.0%	50.0%		
Sugar	56.0%	48.2%		
Salt	1.7%	1.6%		
HEC	0.1%	0.1%		
Bactericide	0.2%	0.1%		

10.0 TISSUE PARAMETERS

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

Simulated Tissue (450MHz)	Dielectric Constant ε _r	Conductivity o (mho/m)	ρ (Kg/m ³)
Brain	48.9 ± 5%	0.61 ± 10%	1000
Muscle	57.5 ± 5%	0.84 ± 10%	1000

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11.0 ROBOT SYSTEM SPECIFICATIONS

Specifications

POSITIONER: Stäubli Unimation Corp. Robot Model: RX60L

Repeatability: 0.02 mm

No. of axis: 6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor: Pentium III
Clock Speed: 450 MHz
Operating System: Windows NT

Data Card: DASY3 PC-Board

Data Converter

Features: Signal Amplifier, multiplexer, A/D converter, and control logic

Software: DASY3 software

Connecting Lines: Optical downlink for data and status info.

Optical uplink for commands and clock

PC Interface Card

Function: 24 bit (64 MHz) DSP for real time processing

Link to DAE3

16 bit A/D converter for surface detection system

serial link to robot

direct emergency stop output for robot

E-Field Probe

Model: ET3DV6 Serial No.: 1387

Construction: Triangular core fiber optic detection system

Frequency: 10 MHz to 6 GHz

Linearity: $\pm 0.2 \text{ dB } (30 \text{ MHz to } 3 \text{ GHz})$

Phantom

Phantom: Generic Twin
Shell Material: Fiberglass
Thickness: 2.0 ± 0.1 mm

12.0 TEST EQUIPMENT LIST

SAR MEASUREMENT SYSTEM				
<u>EQUIPMENT</u>	<u>S/N #</u>	CALIB. DATE		
DASY3 System				
-Robot	599396-01	N/A		
-ET3DV6 E-Field Probe	1387	Sept 1999		
-DAE	383	Sept 1999		
-835MHz Validation Dipole	411	Aug 1999		
-900MHz Validation Dipole	054	Aug 1999		
-1800MHz Validation Dipole	247	Aug 1999		
-Generic Twin Phantom V3.0	N/A	N/A		
85070C Dielectric Probe Kit	N/A	N/A		
Gigatronics 8652A Power Meter	1835272	Oct 1999		
-Power Sensor 80701A	1833535	Oct 1999		
-Power Sensor 80701A	1833542	Oct 1999		
E4408B Spectrum Analyzer	US39240170	Nov 1999		
8594E Spectrum Analyzer	3543A02721	Mar 2000		
8753E Network Analyzer	US38433013	Nov 1999		
8648D Signal Generator	3847A00611	N/A		
5S1G4 Amplifier Research Power Amplifier	26235	N/A		

13.0 MEASUREMENT UNCERTAINTIES

Uncertainty Description	Error	Distribution	Weight	Standard Deviation	Offset
Probe Uncertainty					
Axial isotropy	±0.2 dB	U-Shaped	0.5	±2.4 %	
Spherical isotropy	±0.4 dB	U-Shaped	0.5	±4.8 %	
Isotropy from gradient	±0.5 dB	U-Shaped	0	±	
Spatial resolution	±0.5 %	Normal	1	±0.5 %	
Linearity error	±0.2 dB	Rectangle	1	±2.7 %	
Calibration error	±3.3 %	Normal	1	±3.3 %	
SAR Evaluation Uncertainty					
Data acquisition error	±1 %	Rectangle	1	±0.6 %	
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %	
Conductivity assessment	±10 %	Rectangle	1	±5.8 %	
Spatial Peak SAR Evaluation Uncertainty					
Extrapolated boundary effect	±3 %	Normal	1	±3 %	±5 %
Probe positioning error	±0.1 mm	Normal	1	±1 %	
Integrated and cube orientation	±3 %	Normal	1	±3 %	
Cube Shape inaccuracies	±2 %	Rectangle	1	±1.2 %	
Device positioning	±6 %	Normal	1	±6 %	
Combined Uncertainties				±11.7%	±5 %

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

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

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

14.0 REFERENCES

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

CELLTECH RESEARCH INC. 1955 Moss Court, Kelowna, B.C. CANADA V1Y 9L3 Test Report S/N: 102300-28RSC Date(s) of Tests: October 24, 2000

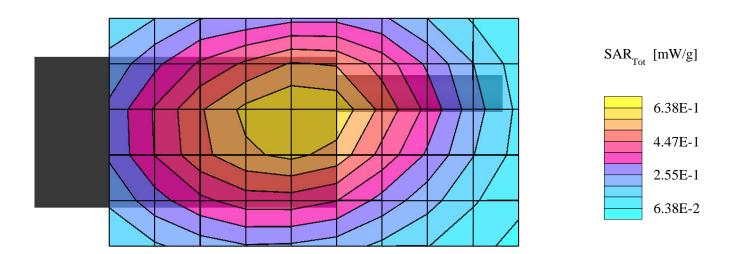
APPENDIX "A" - SAR MEASUREMENT DATA

Generic Twin Phantom; Flat Section; Position: $(90^\circ, 90^\circ)$; Probe: ET3DV6 - SN1387; ConvF(6.76,6.76,6.76); Crest factor: 1.0; 450MHz Brain: $\sigma = 0.61$ mho/m $\epsilon_r = 48.9$ $\rho = 1.00$ g/cm³ Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0

Cube 5x5x7

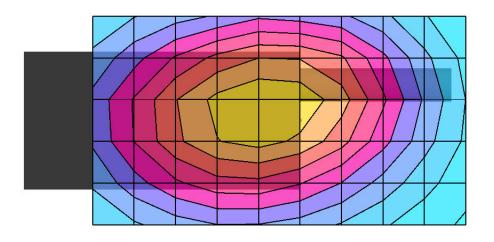
SAR (1g): 0.563 $\,$ mW/g * , SAR (10g): 0.422 $\,$ mW/g Max outside

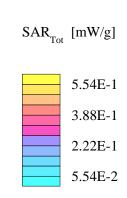
Face SAR
RadioShack Corporation
Model 19-1207
Low Channel [461.0375MHz]
Conducted Power 32dBm
Test date: Oct 24, 2000



SAR (1g): 0.561 mW/g, SAR (10g): 0.425 mW/g

Face SAR
RadioShack Corporation
Model: 19-1207
Unmodulated Carrier
High Channel [469.5625MHz]
Conducted Power 32dBm
Test date: Oct 24, 2000



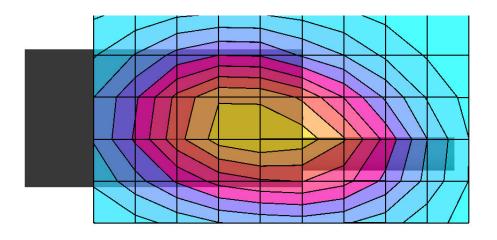


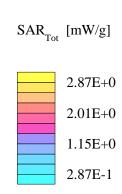
Generic Twin Phantom; Flat Section; Position: (270°,270°); Probe: ET3DV6 - SN1387; ConvF(6.76,6.76,6.76); Crest factor: 1.0; 450MHz Muscle: $\sigma=0.84$ mho/m $\epsilon_r=57.5$ $\rho=1.00$ g/cm³ Coarse: $Dx=20.0,\ Dy=20.0,\ Dz=10.0$

Cube 5x5x7

SAR (1g): 2.52 mW/g, SAR (10g): 1.89 mW/g

Body SAR Using Belt Clip Separation Distance 0.8cm RadioShack Corporation Model 19-1207 Low Channel [461.0375MHz] Conducted Power 32dBm Test date: Oct 24, 2000



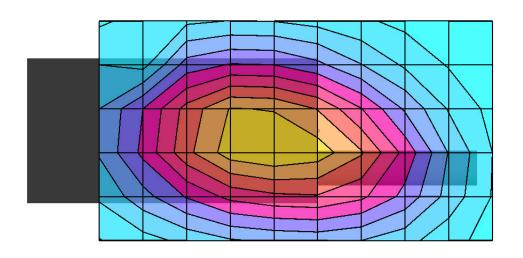


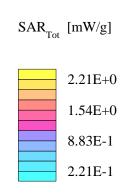
Generic Twin Phantom; Flat Section; Position: (270°,270°); Probe: ET3DV6 - SN1387; ConvF(6.76,6.76,6.76); Crest factor: 1.0; 450MHz Muscle: $\sigma=0.84$ mho/m $\epsilon_r=57.5$ $\rho=1.00$ g/cm³ Coarse: $Dx=20.0,\ Dy=20.0,\ Dz=10.0$

Cube 5x5x7

SAR (1g): 1.99 mW/g, SAR (10g): 1.49 mW/g

Body SAR Using Belt Clip Separation Distance 0.8cm RadioShack Corporation Model 19-1207 High Channel [469.5625MHz] Conducted Power 32dBm Test date: Oct 24, 2000





CELLTECH RESEARCH INC. 1955 Moss Court, Kelowna, B.C. CANADA V1Y 9L3 Test Report S/N: 102300-28RSC Date(s) of Tests: October 24, 2000

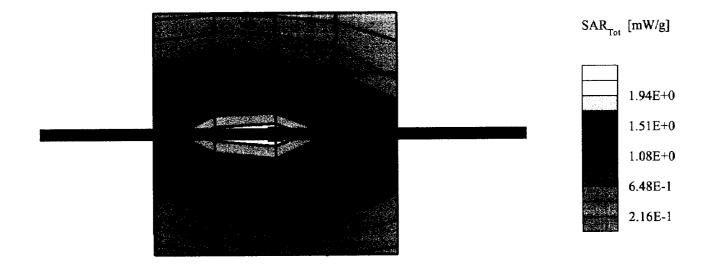
APPENDIX "B" - DIPOLE VALIDATION

Dipole 835 MHz

Generic Twin Phantom; Flat Section; Position: $(90^{\circ}, 90^{\circ})$; Probe: ET3DV6 - SN1387; ConvF(6.43,6.43,6.43); Crest factor: 1.0; Brain 835 MHz: $\sigma = 0.80$ mho/m $\varepsilon_{\tau} = 44.2$ $\rho = 1.00$ g/cm³ Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0

Cube 5x5x7 SAR (1g): 2.03 mW/g, SAR (10g): 1.34 mW/g

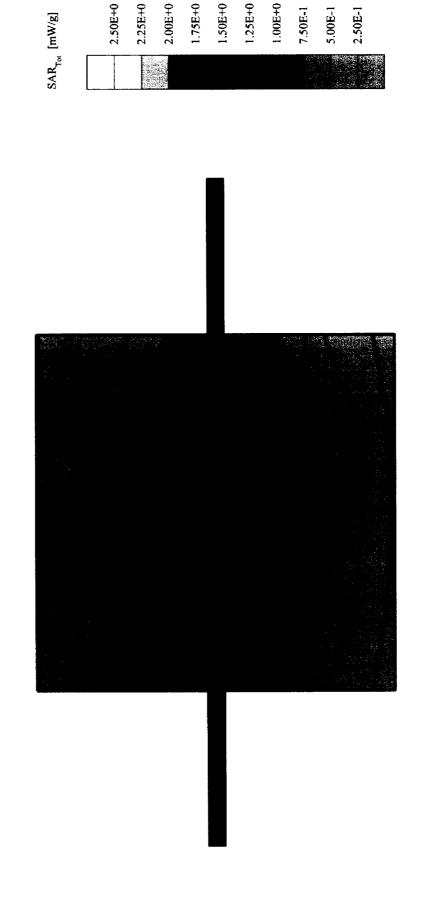
Validation Date: Oct. 24, 2000



Validation Dipole D835V2 SN:411, d = 15mm

Generic Twin Phantom; Flat Section; Grid Spacing: Dx = 20.0, Dy = 20.0, Dz = 10.0 Frequency: 835 MHz; Antenna Input Power: 250 [mW]

Probe: ET3DV5 - SN1342/DAE3; ConvF(5.75,5.75); Brain 835 MHz: $\sigma = 0.80$ mho/m $\epsilon_r = 44.2$ $\rho = 1.00$ g/cm³ Cubes (2): Peak: 3.07 mW/g ± 0.05 dB, SAR (1g): 2.06 mW/g ± 0.05 dB, SAR (10g): 1.38 mW/g ± 0.05 dB, (Worst-case extrapolation) Penetration depth: 13.6 (12.7, 14.8) [mm] Powerdrift: -0.00 dB



Schmid & Partner Engineering AG, Zurich Switzerland

APPENDIX "C" - PROBE CALIBRATION

Schmid & Partner Engineering AG

Staffelstrasse 8, 8045 Zurich, Switzerland, Telefon +41 1 280 08 60, Fax +41 1 280 08 64

Probe ET3DV6

SN:1387

Manufactured:
Last calibration:

September 21, 1999 September 22, 1999

Calibrated for System DASY3

DASY3 - Parameters of Probe: ET3DV6 SN:1387

Sensitivity in Free Space	Diode Compression

NomX	1.55 μV/(V/m) ²	DCP X	98 mV
NomY	1.65 μ V/(V/m) ²	DCP Y	98 mV
NormZ	1.64 μV/(V/m) ²	DCP Z	98 mV

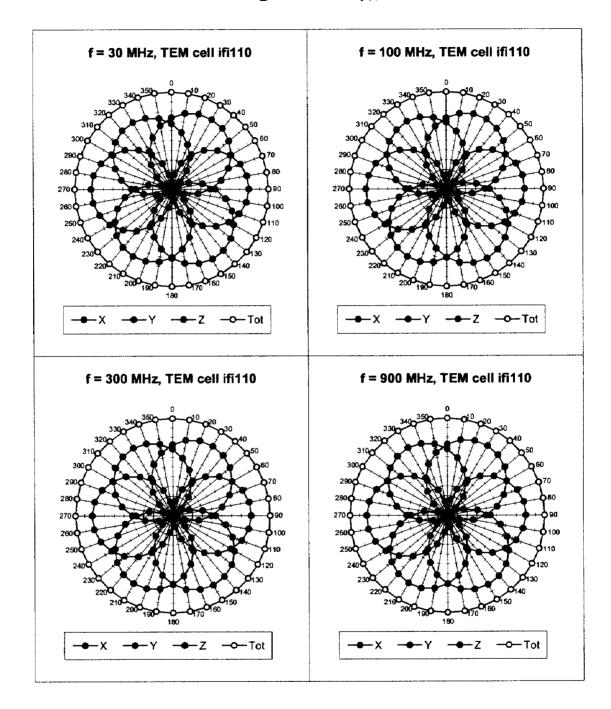
Sensitivity in Tissue Simulating Liquid

Brain	450 MHz		$\varepsilon_r = 48 \pm 5\%$	σ = 0.50 ± 10% mho/m		
	ConvF X	6.76	extrapolated	Boundary eff	ect:	
	ConvF Y	6.76	extrapolated	Alpha	0.30	
	ConvF Z	6.76	extrapolated	Depth	2.52	
Brain	900 MHz		$\varepsilon_{\rm r}$ = 42.5 ± 5%	σ = 0.86 ± 10% r	σ = 0.86 ± 10% mho/m	
	ConvF X	6.34	± 7% (k=2)	Boundary eff	Boundary effect:	
	ConvF Y	6.34	± 7% (k=2)	Alpha	0.47	
	ConvF Z	6.34	± 7% (k=2)	Depth	2.25	
Brain	1500 MHz		$\varepsilon_{\rm r}$ = 41 ± 5%	σ = 1.32 ± 10% ι	σ = 1.32 ± 10% mho/m	
	ConvF X	5.78	interpolated	Boundary ef	ect:	
	ConvF Y	5 78	interpolated	Alpha	0.69	
	001111	9.10	interpolated	Alpha	0.00	
	ConvF Z		interpolated	Depth	1.88	
Brain		5.78	•	•	1.88	
Brain	ConvF Z	5.78 AHz	interpolated	Depth	1.88 nho/m	
Brain	ConvF Z	5.78 AHz 5.50	interpolated $\epsilon_{\rm r} = 41 \pm 5\%$	Depth σ = 1.69 ± 10% ι	1.88 nho/m	

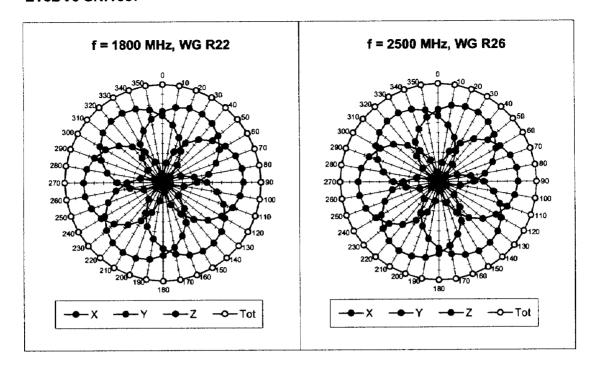
Sensor Offset

Probe Tip to Sensor Center	2.7	mm
Optical Surface Detection	1.6 ± 0.2	mm

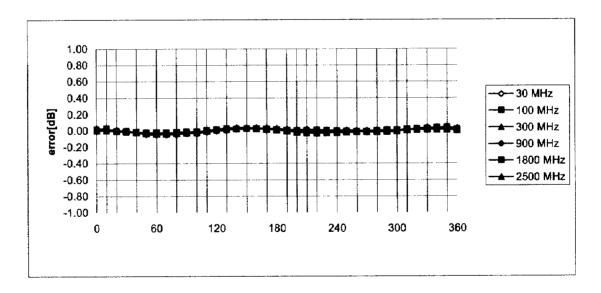
Receiving Pattern (ϕ), θ = 0°



ET3DV6 SN:1387

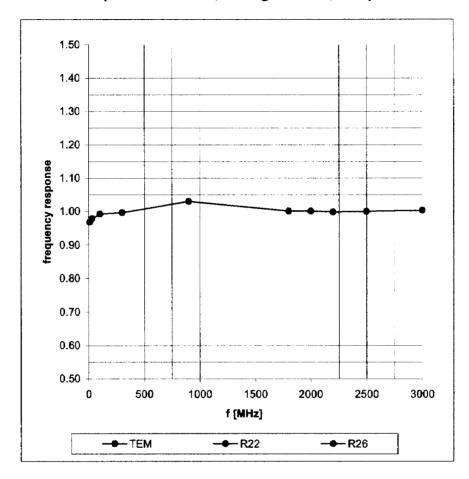


Isotropy Error (ϕ), θ = 0°



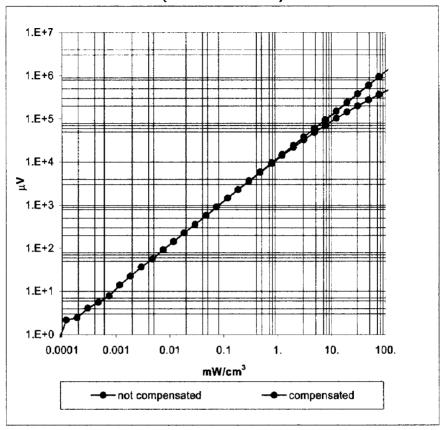
Frequency Response of E-Field

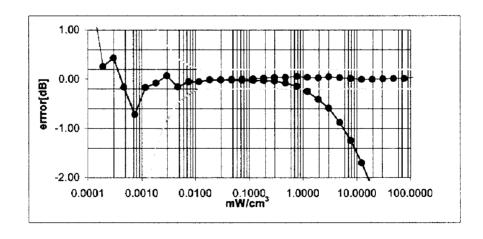
(TEM-Cell:ifi110, Wavegulde R22, R26)



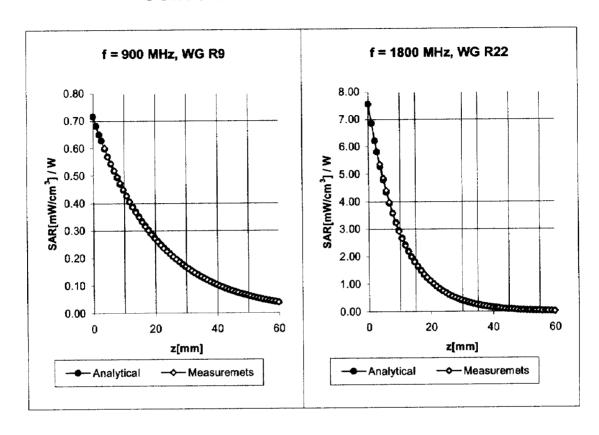
Dynamic Range f(SAR_{brain})

(TEM-Cell:ifi110)



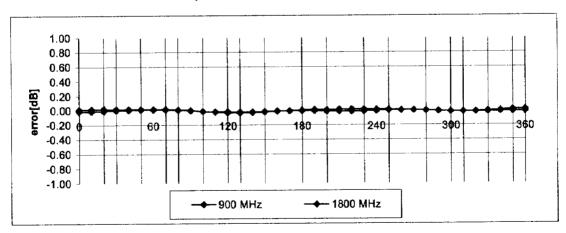


Conversion Factor Assessment



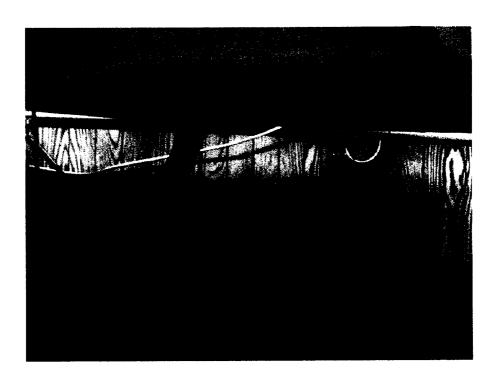
Receiving Pattern (\$\phi\$)

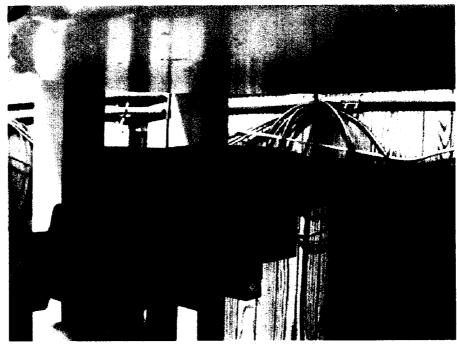
(in brain tissue, z = 5 mm)



APPENDIX "D" - TEST SETUP PHOTOGRAPHS

FACE-HELD SAR TEST SETUP PHOTOGRAPHS 4.0cm Separation Distance





BODY-WORN SAR TEST SETUP PHOTOGRAPHS 0.8cm Separation Distance with Belt-Clip

