

DECLARATION OF COMPLIANCE SAR EVALUATION				
<u>Test Lab</u>	Applicant Information			
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Test Procedure(s): Device Type: FCC ID: Model(s): Modulation: Tx Frequency Range(s):	FCC 47 CFR §2.1093 FCC OET Bulletin 65, Supplement C (01-01) Portable UHF GMRS/FRS PTT Radio Transceiver BBOPR350 PR-350 FM (UHF) 462.5500 - 462.7250 MHz (GMRS Channels 15-22) 462.5625 - 462.7125 MHz (FRS/GMRS Channels 1-7) 467.5625 - 467.7125 MHz (FRS Channels 8-14)			
RF Output Power Tested: No. of Channels: Antenna Type(s): Battery Type(s): Body-Worn Accessories: Max. SAR Measured:	1.0 Watt Conducted (GMRS) 22 Fixed 1.5V AAA Alkaline (x4) Belt-Clip, Lapel Ear-Microphone 0.641 W/kg - Face-held (100% duty cycle) 0.976 W/kg - Body-worn (100% duty cycle)			

Celltech Research Inc. declares under its sole responsibility that this device was found to be in compliance with the Specific Absorption Rate (SAR) RF exposure requirements specified in FCC 47 CFR §2.1093. The device was tested in accordance with the measurement standards and procedures specified in FCC OET Bulletin 65, Supplement C, Edition 01-01 (General Population / Uncontrolled Exposure).

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.

This test report shall not be reproduced partially, or in full, without the prior written approval of Celltech Research Inc. The results and statements contained in this report pertain only to the device(s) evaluated.

W. Pupe

Russell W. Pipe Senior Compliance Technologist Celltech Research Inc.







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1.0 INTRODUCTION

This measurement report demonstrates compliance of the Cobra Electronics Corporation Model: PR-350 Portable UHF GMRS/FRS PTT Radio Transceiver FCC ID: BBOPR350 with the rules and requirements of FCC 47 CFR §2.1093 (see reference [1]) for the General Population / Uncontrolled Exposure environment. The test procedures described in FCC OET Bulletin 65, Supplement C, Edition 01-01 (see reference [2]) 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 Device Under Test (DUT)

Rule Part(s)	FCC 47 CFR §2.1093		
Test Procedure	FCC OET Bulletin 65, Supplement C (01-01)		
Device Type	Portable UHF GMRS/FRS PTT Radio Transceiver		
FCC ID	BBOPR350		
Model(s)	PR-350		
Serial No.	Pre-production		
Modulation	FM (UHF)		
Tx Frequency Range	462.5500 - 462.7250 MHz (GMRS Channels 15-22) 462.5625 - 462.7125 MHz (FRS/GMRS Channels 1-7) 467.5625 - 467.7125 MHz (FRS Channels 8-14)		
RF Output Power Tested	1.0 Watt Conducted (GMRS)		
Battery Type(s)	1.5V AAA Alkaline (x4)		
Antenna Type(s)	Fixed		
Body-Worn Accessories Tested	Belt-Clip Lapel Ear-Microphone		



3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG[™]) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, specific anthropomorphic mannequin (SAM) phantom, and various planar phantoms for brain and/or body SAR evaluations. 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 plugin card. The DAE3 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gainswitching multiplexer, a fast 16-bit AD-converter and a command decoder and control logic unit. Transmission to the PCcard is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.



DASY3 SAR Measurement System with SAM Phantom



DASY3 SAR Measurement System with validation phantom



4.0 MEASUREMENT SUMMARY

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

	SAR EVALUATION RESULTS										
Freq. Chan.		0	Output	Powe	Antenna	Battery	Body-Worn	Separation Distance	Fluid	SAR (W/kg)	
(MHz)		mouo	Power (Cond.)	(dB)	Position	Туре	Accessory	(cm)	Туре	100% Duty Cycle	50% Duty Cycle
462.6250	18	CW	1.0 W	-0.05	Fixed	Alkaline	(Face-Held)	2.5	Brain	0.641	0.321
462.6250	18	CW	1.0 W	-0.16	Fixed	Alkaline	Belt-Clip Ear-Mic	0.6	Body	0.976	0.488
					Peak - Uncont	rolled Expos	SAFETY LIMIT ure / General Pop reraged over 1 gr				
		Bra	ain 450MH	z	Body 450MHz Atmospheric Pressure				101.3 kPa		
Dielectric C	Constant	Targe	t Me	asured	Target	Measured	Relative Humidity			46 %	
		43.5 (+/-	5%)	44.3	56.7 (+/- 5%)	59.0	Ambient Temperature			23.1 °C	
	Brain 450M		ain 450MH	z	Body 45	0MHz	Fluid Temperature			22.3 °C	
Conduc	tivity	Targe	t Me	asured	Target	Measured	Fluid	Fluid Depth ≥ 15 cl		1	
		0.87 (+/-	5%)	0.86	0.94 (+/- 5%)	0.96	Phanto	Phantom Section Planar			

Note(s):

- 1. The transmission band of the DUT is less than 10 MHz, therefore mid channel data only is reported (per FCC OET Bulletin 65, Supplement C, Edition 01-01 see reference [2]).
- 2. The ambient and fluid temperatures were measured prior to, and during, the fluid dielectric parameter check and the SAR evaluation. The temperatures listed in the table above were consistent for all measurement periods.



5.0 DETAILS OF SAR EVALUATION

The Cobra Electronics Corporation Model: PR-350 Portable UHF GMRS/FRS PTT Radio Transceiver FCC ID: BBOPR350 was found to be compliant for localized Specific Absorption Rate (Uncontrolled Exposure) based on the test provisions and conditions described below. The detailed test setup photographs are shown in Appendix G.

- 1. The DUT was evaluated in a face-held configuration with the front of the device placed parallel to the outer surface of the SAM planar phantom. A 2.5 cm separation distance was maintained between the front side of the DUT and the outer surface of the SAM planar phantom for the duration of the tests.
- 2. The DUT was tested in a body-worn configuration with the back of the device placed parallel to the outer surface of the SAM planar phantom. The attached belt-clip was positioned touching the planar phantom and provided a 0.6 cm separation distance between the back of the DUT and the outer surface of the SAM planar phantom. The DUT was evaluated for body-worn SAR with the lapel ear-microphone accessory connected.
- 3. The DUT was operated for an appropriate period prior to the evaluation in order to minimize power drift.
- 4. The conducted output power of the DUT could not be measured for the SAR evaluation. The DUT was evaluated for SAR at the maximum conducted power level set by the manufacturer.
- 5. The DUT was tested in unmodulated continuous transmit operation (Continuous Wave mode at 100% duty cycle) with the transmit key constantly depressed. The 50% duty cycle compensation reported for this push-to-talk device assumes a transmit/receive cycle of equal time base.
- 6. The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the device and its antenna.
- 7. The DUT was tested with fully charged alkaline batteries.

6.0 EVALUATION PROCEDURES

a. (i) The evaluation was performed in the applicable area of the phantom depending on the type of device being tested. For devices held to the ear during normal operation, both the left and right ear positions were evaluated in accordance with FCC OET Bulletin 65, Supplement C (Edition 01-01) using the SAM phantom.

(ii) For body-worn and face-held devices a planar phantom was used.

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. Based on the area scan data, the area of maximum absorption was determined by spline interpolation. Around this point, a volume of 40 x 40 x 35 mm (fine resolution volume scan, zoom scan) was assessed by measuring $5 \times 5 \times 7$ points.

d. The 1g and 10g spatial peak SAR was determined as follows:

1. The first step was an extrapolation to find the points between the dipole center of the probe and the surface of the phantom. This data cannot be measured, since the center of the dipoles is 2.7 mm away form the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm (see probe calibration document in Appendix D). The extrapolation was based on a least square algorithm [W. Gander, Computermathematik, p.168-180] (see reference [4]). Through the points in the first 3 cm in all z-axis, polynomials of the fourth order were calculated. This polynomial was then used to evaluate the points between the surface and the probe tip.

2. The next step used 3D-spline interpolation to get all points within the measured volume in a 1mm grid (35000 points). 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 -direction) [Numerical Recipes in C, Second Edition, p.123ff] (see reference [4]).

3. The maximal interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-spline interpolation algorithm. 8000 points (20x20x20) were interpolated to calculate the average.



EVALUATION PROCEDURES (Cont.)

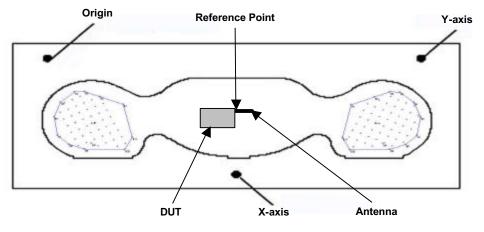


Figure 1. Phantom Reference Point & DUT Positioning (Face-held)

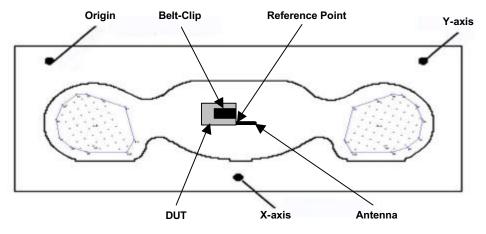


Figure 2. Phantom Reference Point & DUT Positioning (Body-worn)



7.0 SYSTEM PERFORMANCE CHECK

Prior to the evaluation a system check was performed with a planar phantom and a 450MHz dipole (see Appendix C for system validation procedures). The dielectric parameters of the simulated tissue fluids were measured prior to the validation using an 85070C Dielectric Probe Kit and an 8753E Network Analyzer (see Appendix E for printout of measured fluid dielectric parameters). A forward power of 250mW was applied to the dipole and system was verified to a tolerance of \pm 10% (see Appendix B for system check test plot).

	SYSTEM PERFORMANCE CHECK										
							Fluid Depth				
	450MHz	Target	Measured	Target	Measured	Target	Measured	1000			. –
12/20/02	(Brain)	1.23 ±10%	1.28	43.5 ±5%	44.3	0.87 ±5%	0.86	1000	23.1 °C	22.3 °C	≥ 15 cm

Note(s):

1. The ambient and fluid temperatures were measured prior to, and during, the fluid dielectric parameter check and the system performance check. The temperatures listed in the table above were consistent for all measurement periods.

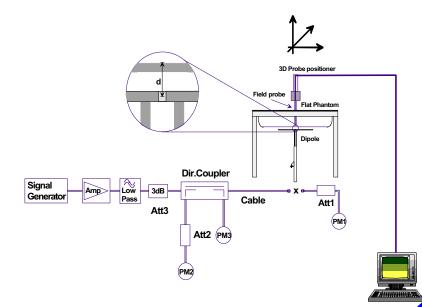


Figure 3. System Check Setup Diagram



450MHz System Check Setup Photograph



8.0 SIMULATED TISSUES

The 450MHz brain and body tissue mixtures consist of a viscous gel using hydroxethylcellulose (HEC) gelling agent and saline solution. Preservation with a bactericide is added and visual inspection is made to ensure air bubbles are not trapped during the mixing process. The fluid was prepared according to standardized procedures, and measured for dielectric parameters (permittivity and conductivity).

TISSUE MIXTURES						
INGREDIENT	450MHz Body (DUT Evaluation)					
Water	38.56 %	52.00 %				
Sugar	56.32 %	45.65 %				
Salt	3.95 %	1.75 %				
HEC	0.98 %	0.50 %				
Bactericide	0.19 %	0.10 %				

9.0 SAR SAFETY LIMITS

	SAR (W/kg)			
EXPOSURE LIMITS	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)		
Spatial Average (averaged over the whole body)	0.08	0.4		
Spatial Peak (averaged over any 1g of tissue)	1.60	8.0		
Spatial Peak (hands/wrists/feet/ankles averaged over 10g)	4.0	20.0		

Notes:

- 1. Uncontrolled environments are defined as locations where there is potential exposure of individuals who have no knowledge or control of their potential exposure.
- 2. Controlled environments are defined as locations where there is potential exposure of individuals who have knowledge of their potential exposure and can exercise control over their exposure.



10.0 ROBOT SYSTEM SPECIFICATIONS

Specif	ications	
	POSITIONER:	Stäubli Unimation Corp. Robot Model: RX60L
	Repeatability:	0.02 mm
	No. of axis:	6
Data A	cquisition Electronic (DA	E) 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 Inte	erface 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	l Probe	
	Model:	ET3DV6
	Serial No.:	1387
	Construction:	Triangular core fiber optic detection system
	Frequency:	10 MHz to 6 GHz
	Linearity:	± 0.2 dB (30 MHz to 3 GHz)
Evolua	tion Phantom	
Lvalua		SAM V4.0C
	Type: Shell Material:	
		Fiberglass
	Thickness:	2.0 ±0.1 mm
	Volume:	Approx. 20 liters
Validat	tion Phantom (for devices	
	Туре:	Large Planar Phantom
	Shell Material:	Plexiglas
	Bottom Thickness:	6.2 mm ± 0.1mm
	Dimensions:	83.5 cm (L) x 36.9 cm (W) x 21.8 cm (H)



11.0 PROBE SPECIFICATION (ET3DV6)

Construction:	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g. glycol)
Calibration:	In air from 10 MHz to 2.5 GHz
	In brain simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy \pm 8%)
Frequency:	10 MHz to > 6 GHz; Linearity: \pm 0.2 dB
	(30 MHz to 3 GHz)
Directivity:	\pm 0.2 dB in brain tissue (rotation around probe axis)
	\pm 0.4 dB in brain tissue (rotation normal to probe axis)
Dynam. Rnge:	5 μ W/g to > 100 mW/g; Linearity: \pm 0.2 dB
Srfce. Detect.	\pm 0.2 mm repeatability in air and clear liquids over
	diffuse reflecting surfaces
Dimensions:	Overall length: 330 mm
	Tip length: 16 mm
	Body diameter: 12 mm
	Tip diameter: 6.8 mm
	Distance from probe tip to dipole centers: 2.7 mm
Application:	General dosimetry up to 3 GHz
	Compliance tests of mobile phone



ET3DV6 E-Field Probe

12.0 LARGE PLANAR PHANTOM

The large planar phantom is constructed of Plexiglas material with a 6.0 mm shell thickness for SAR validations at and below 450MHz. The large planar phantom is mounted in the DASY3 compact system in place of the SAM phantom.

13.0 SAM PHANTOM V4.0C

The SAM phantom V4.0C is a fiberglass shell phantom with a 2.0mm shell thickness for left and right head and flat planar area integrated in a wooden table. The shape of the fiberglass shell corresponds to the phantom defined by SCC34-SC2. The device holder positions are adjusted to the standard measurement positions in the three sections.



The DASY3 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.



Large Planar Phantom



SAM Phantom



Device Holder



15.0 TEST EQUIPMENT LIST

SAR MEASUREMENT SYSTEM					
EQUIPMENT	SERIAL NO.	CALIBRATION DATE			
DASY3 System -Robot -ET3DV6 E-Field Probe -300MHz Validation Dipole -450MHz Validation Dipole -900MHz Validation Dipole -1800MHz Validation Dipole -2450MHz Validation Dipole -SAM Phantom V4.0C -Small Planar Phantom -Medium Planar Phantom -Large Planar Phantom	599396-01 1387 135 136 054 247 150 N/A N/A N/A N/A	N/A Feb 2002 Oct 2002 Oct 2002 June 2001 June 2001 Oct 2002 N/A N/A N/A N/A			
85070C Dielectric Probe Kit	N/A	N/A			
Gigatronics 8652A Power Meter -Power Sensor 80701A -Power Sensor 80701A	1835272 1833535 1833542	Feb 2002 Feb 2002 Mar 2002			
E4408B Spectrum Analyzer	US39240170	Nov 2002			
8594E Spectrum Analyzer	3543A02721	Feb 2002			
8753E Network Analyzer	US38433013	Feb 2002			
8648D Signal Generator	3847A00611	Feb 2002			
5S1G4 Amplifier Research Power Amplifier	26235	N/A			



16.0 MEASUREMENT UNCERTAINTIES

Error Description	Uncertainty Value ±%	Probability Distribution	Divisor	c _i 1g	Standard Uncertainty ±% (1g)	Vi O r V eff
Measurement System						
Probe calibration	± 4.8	Normal	1	1	± 4.8	~
Axial isotropy of the probe	± 4.7	Rectangular	√3	(1-c _p)	± 1.9	~
Spherical isotropy of the probe	± 9.6	Rectangular	√3	(C _p)	± 3.9	~
Spatial resolution	± 0.0	Rectangular	√3	1	± 0.0	~
Boundary effects	± 5.5	Rectangular	√3	1	± 3.2	~
Probe linearity	± 4.7	Rectangular	√3	1	± 2.7	∞
Detection limit	± 1.0	Rectangular	√3	1	± 0.6	~
Readout electronics	± 1.0	Normal	1	1	± 1.0	~
Response time	± 0.8	Rectangular	√3	1	± 0.5	~
Integration time	± 1.4	Rectangular	√3	1	± 0.8	~
RF ambient conditions	± 3.0	Rectangular	√3	1	± 1.7	~
Mech. constraints of robot	± 0.4	Rectangular	√3	1	± 0.2	~
Probe positioning	± 2.9	Rectangular	√3	1	± 1.7	~
Extrapolation & integration	± 3.9	Rectangular	√3	1	± 2.3	~
Test Sample Related						
Device positioning	± 6.0	Normal	√3	1	± 6.7	12
Device holder uncertainty	± 5.0	Normal	√3	1	± 5.9	8
Power drift	± 5.0	Rectangular	√3		± 2.9	~
Phantom and Setup						
Phantom uncertainty	± 4.0	Rectangular	√3	1	± 2.3	∞
Liquid conductivity (target)	± 5.0	Rectangular	√3	0.6	± 1.7	~
Liquid conductivity (measured)	± 5.0	Rectangular	√3	0.6	± 1.7	~
Liquid permittivity (target)	± 5.0	Rectangular	√3	0.6	± 1.7	~
Liquid permittivity (measured)	± 5.0	Rectangular	√3	0.6	± 1.7	~
Combined Standard Uncertainty					± 13.7	
Expanded Uncertainty (k=2) (95% Confidence Level)					± 27.5	

Measurement Uncertainty Table in accordance with IEEE Std 1528 (Draft - see reference [3])



17.0 REFERENCES

[1] Federal Communications Commission, "Radiofrequency radiation exposure evaluation: portable devices", Rule Part 47 CFR §2.1093: 1999.

[2] Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields", OET Bulletin 65, Supplement C (Edition 01-01), FCC, Washington, D.C.: June 2001.

[3] IEEE Standards Coordinating Committee 34, 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".

[4] W. Gander, *Computermathematick*, Birkhaeuser, Basel: 1992.

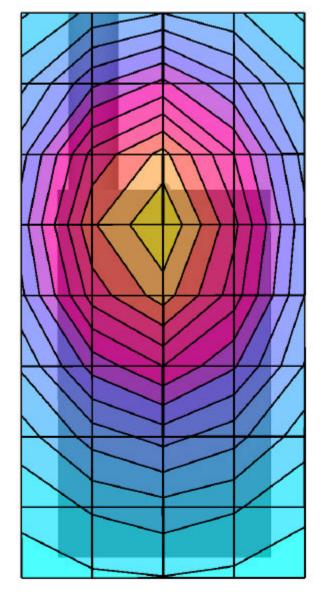


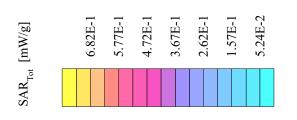
Test Report S/N: 111402-315BBO Test Date(s): December 20, 2002 FCC SAR Evaluation

APPENDIX A - SAR MEASUREMENT DATA

Cobra Electronics Corporation FCC ID: BBOPR350 SAM Phantom; Flat Section; Position: $(90^{\circ},90^{\circ})$ Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0 450 MHz Brain: $\sigma = 0.86 \text{ mho/m} \text{ } \text{e}_{T} = 44.3 \text{ } \text{p} = 1.00 \text{ g/cm}^{3}$ Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0 Cube 5x5x7; Powerdrift: -0.05 dB SAR (1g): 0.641 mW/g, SAR (10g): 0.453 mW/g

Face-held SAR - 2.5 cm Separation Distance Portable UHF FRS/GMRS Radio Model: PR-350 AAA Alkaline Batteries (x4) Continuous Wave Mode GMRS Mid Channel [462.6250 MHz] Conducted Power: 1.0 Watt (GMRS) Ambient Temp. 23.1°C; Fluid Temp. 22.3°C Date Tested: December 20, 2002

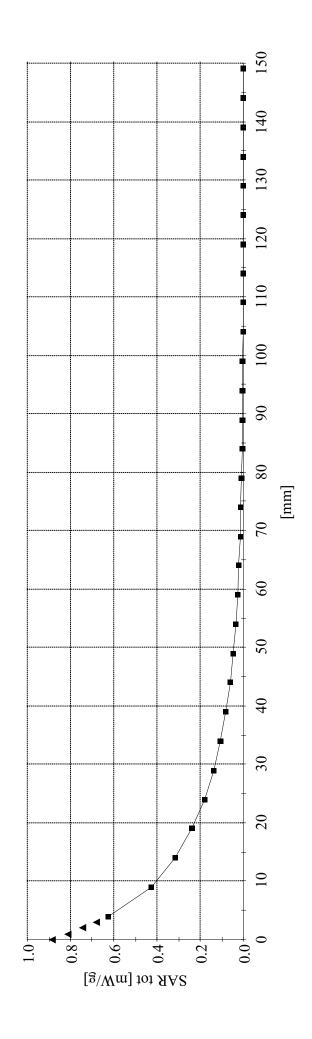




Cobra Electronics Corporation FCC ID: BBOPR350 SAM Phantom; Flat Section Probe: ET3DV6 - SN1387; ConvF(7.30,7.30,7.30); Crest factor: 1.0 450 MHz Brain: $\sigma = 0.86$ mho/m $\epsilon_r = 44.3 \text{ p} = 1.00 \text{ g/cm}^3$

Z-Axis Extrapolation at Peak SAR Location

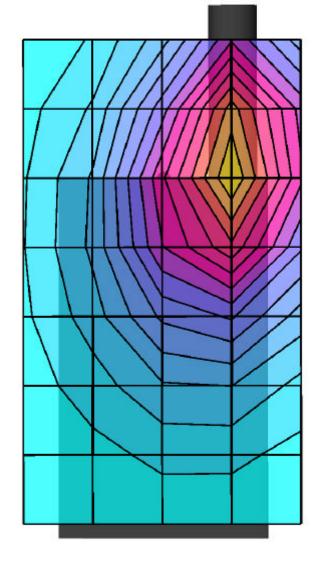
Face-held SAR - 2.5 cm Separation Distance Portable UHF FRS/GMRS Radio Model: PR-350 AAA Alkaline Batteries (x4) Continuous Wave Mode GMRS Mid Channel [462.6250 MHz] Conducted Power: 1.0 Watt (GMRS) Ambient Temp. 23.1°C; Fluid Temp. 22.3°C Date Tested: December 20, 2002



Cobra Electronics Corporation FCC ID: BBOPR350 SAM Phantom; Flat Section; Position: $(270^{\circ}, 270^{\circ})$ Probe: ET3DV6 - SN1387; ConvF(7.70,7.70,7.07); Crest factor: 1.0 450 MHz Muscle: $\sigma = 0.96$ mho/m $\epsilon_{r} = 59.0$, $\rho = 1.00$ g/cm³ Coarse: Dx = 20.0, Dy = 20.0, Dz = 10.0

Cube 5x5x7; Powerdrift: -0.16 dB SAR (1g): 0.976 mW/g, SAR (10g): 0.656 mW/g Body-Worn SAR - 0.6 cm Belt-Clip Separation Distance Portable UHF FRS/GMRS Radio Model: PR-350

 -worn SAK - 0.0 cm Bett-Cup Separation List ortable UHF FRS/GMRS Radio Model: PR-350 with Lapel Ear-Microphone Accessory AAA Alkaline Batteries (x4) Continuous Wave Mode GMRS Mid Channel [462.6250 MHz] Conducted Power: 1.0 Watt (GMRS) Ambient Temp. 23.1°C; Fluid Temp. 22.3°C Date Tested: December 20, 2002

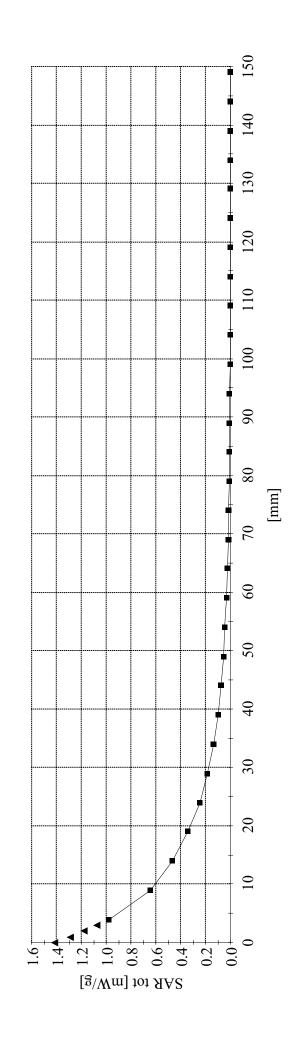




Cobra Electronics Corporation FCC ID: BBOPR350 SAM Phantom; Flat Section Probe: ET3DV6 - SN1387; ConvF(7.70,7.70); Crest factor: 1.0 450 MHz Muscle: $\sigma = 0.96$ mho/m $\epsilon_r = 59.0 \ \rho = 1.00 \ g/cm^3$

Z-Axis Extrapolation at Peak SAR Location

Body-Worn SAR - 0.6 cm Belt-Clip Separation Distance Portable UHF FRS/GMRS Radio Model: PR-350 with Lapel Ear-Microphone Accessory AAA Alkaline Batteries (x4) Continuous Wave Mode GMRS Mid Channel [462.6250 MHz] Conducted Power: 1.0 Watt (GMRS) Ambient Temp. 23.1°C; Fluid Temp. 22.3°C Date Tested: December 20, 2002



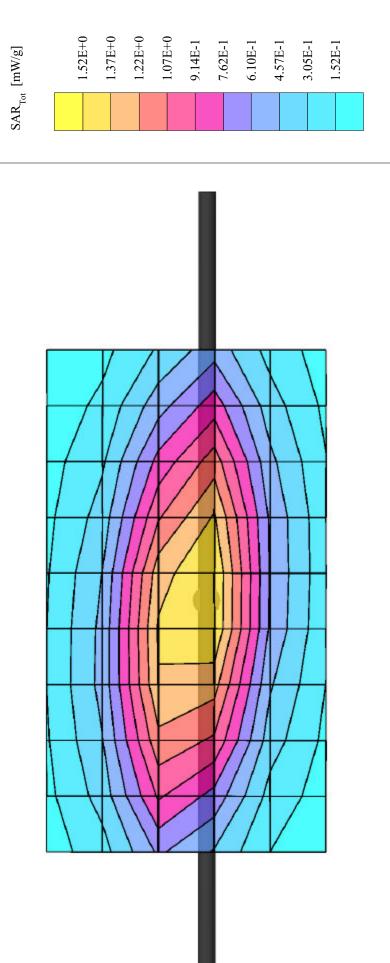


APPENDIX B - SYSTEM PERFORMANCE CHECK

System Performance Check - 450MHz Dipole

Probe: ET3DV6 - SN1387; ConvF(7.30,7.30); Crest factor: 1.0; 450 MHz Brain: $\sigma = 0.86$ mho/m $\epsilon_r = 44.3$ $\rho = 1.00$ g/cm³ Cube 5x5x7: Peak: 2.05 mW/g, SAR (1g): 1.28 mW/g, SAR (10g): 0.836 mW/g, (Worst-case extrapolation) Penetration depth: 12.0 (10.4, 14.1) [mm]; Powerdrift: -0.02 dB Ambient Temp 23.1°C; Fluid Temp 22.3°C Large Planar Phantom; Planar Section

Forward Conducted Power: 250 mW Date Tested: December 20, 2002

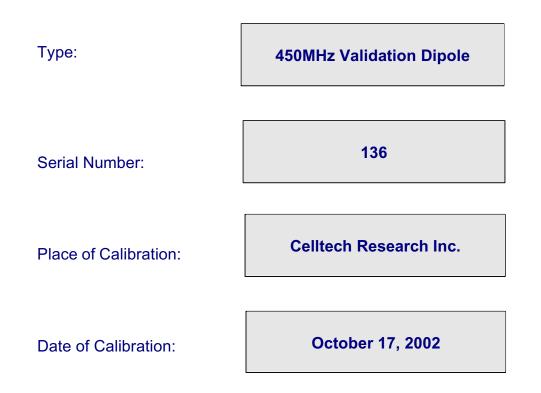




APPENDIX C - SYSTEM VALIDATION



450MHz SYSTEM VALIDATION DIPOLE



Celltech Research Inc. hereby certifies that this device has been calibrated on the date indicated above.

Calibrated by:

Kussell W. Pupe

Approved by:

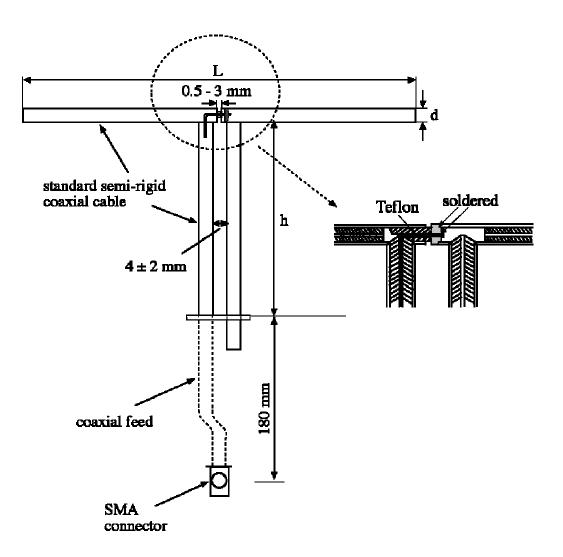
1. Dipole Construction & Electrical Characteristics

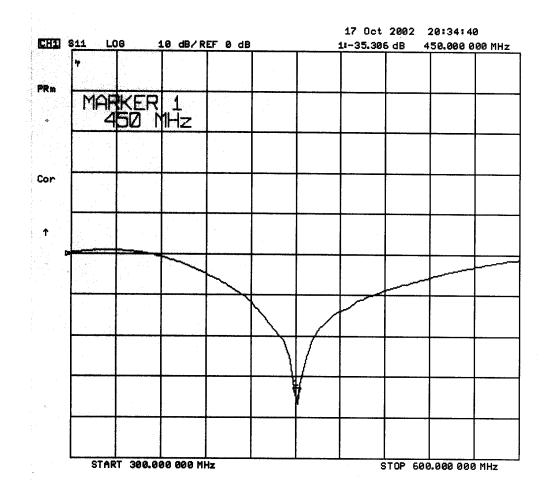
The validation dipole was constructed in accordance with the IEEE Std "Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques". The electrical properties were measured using an HP 8753E Network Analyzer. The network analyzer was calibrated to the validation dipole N-type connector feed point using an HP85032E Type N calibration kit. The dipole was placed parallel to a planar phantom at a separation distance of 15.0mm from the simulating fluid using a loss-less dielectric spacer. The measured input impedance is:

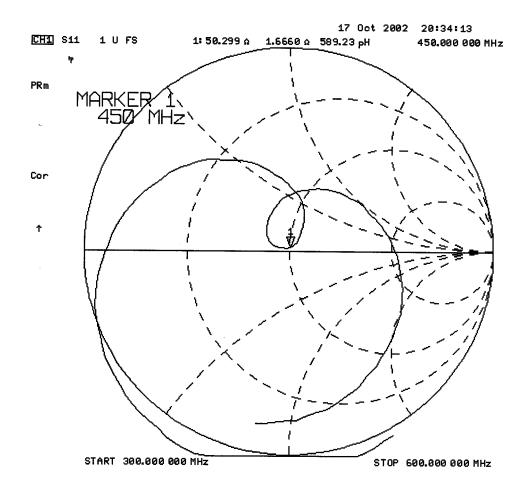
Feed point impedance at 450MHz	Re{Z} = 50.299Ω
	lm{Z} = 1.6660Ω

Return Loss at 450MHz

-35.306dB







Validation Dipole Dimensions

Frequency (MHz)	L (mm)	h (mm)	d (mm)
300	420.0	250.0	6.2
450	288.0	167.0	6.2
835	161.0	89.8	3.6
900	149.0	83.3	3.6
1450	89.1	51.7	3.6
1800	72.0	41.7	3.6
1900	68.0	39.5	3.6
2000	64.5	37.5	3.6
2450	51.8	30.6	3.6
3000	41.5	25.0	3.6

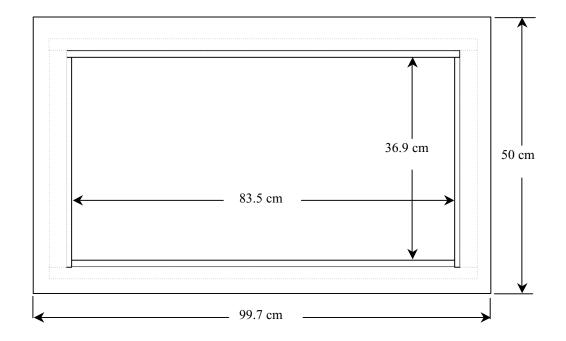
2. Validation Phantom

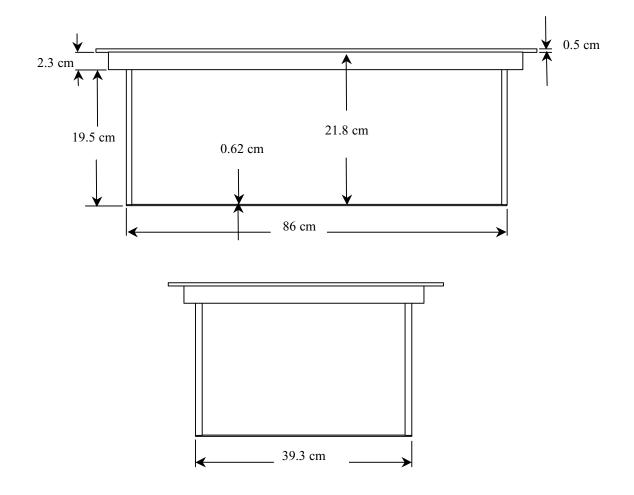
The validation phantom was constructed using relatively low-loss tangent Plexiglas material. The dimensions of the phantom are as follows:

Length:	83.5 cm
Width:	36.9 cm
Height:	21.8 cm

The bottom of the phantom is constructed of 6.2 ± 0.1 mm Plexiglas.

Dimensions of Plexiglas Planar Phantom





450MHz System Validation Setup



450MHz System Validation Setup



3. Measurement Conditions

The planar phantom was filled with brain simulating tissue having the following electrical parameters at 450MHz:

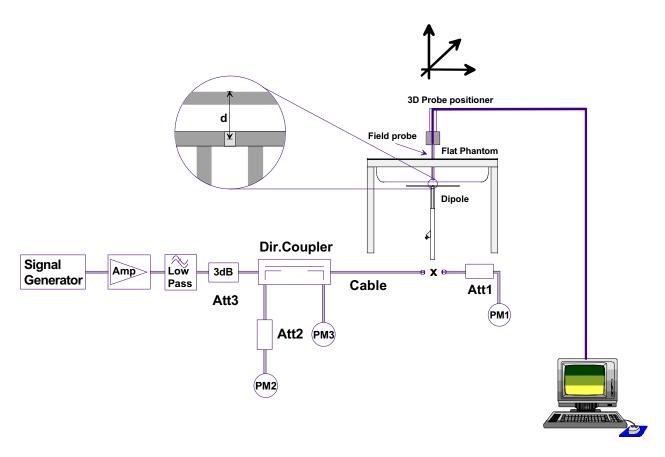
Relative Permittivity:	44.1
Conductivity:	0.88 mho/m
Ambient Temperature:	23.3 °C
Fluid Temperature:	22.2 °C
Fluid Depth:	≥ 15.0 cm

The 450MHz simulating tissue consists of the following ingredients:

Ingredient	Percentage by weight
Water	38.56%
Sugar	56.32%
Salt	3.95%
HEC	0.98%
Dowicil 75	0.19%
Target Dielectric Parameters at 22°C	ε _r = 43.5 σ = 0.87 S/m

4. SAR Measurement

The SAR measurement was performed with the E-field probe in mechanical detection mode only. The setup and determination of the forward power into the dipole was performed using the following procedures.



First the power meter PM1 (including attenuator Att1) is connected to the cable to measure the forward power at the location of the dipole connector (X). The signal generator is adjusted for the desired forward power at the dipole connector (taking into account the attenuation of Att1) as read by power meter PM2. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter PM2. If the signal generator does not allow adjustment in 0.01dB steps, the remaining difference at PM2 must be taken into consideration. PM3 records the reflected power from the dipole to ensure that the value is not changed from the previous value. The reflected power should be 20dB below the forward power.

Ten SAR measurements were performed in order to achieve repeatability and to establish an average target value.

Validation Measurement	SAR @ 0.25W Input averaged over 1g	SAR @ 1W Input averaged over 1g	SAR @ 0.25W Input averaged over 10g	SAR @ 1W Input averaged over 10g	Peak SAR @ 0.25W Input
Test 1	1.32	5.28	0.887	3.55	2.20
Test 2	1.26	5.04	0.856	3.42	2.09
Test 3	1.38	5.52	0.931	3.72	2.30
Test 4	1.36	5.44	0.917	3.67	2.27
Test 5	1.37	5.48	0.922	3.69	2.28
Test 6	1.33	5.32	0.896	3.58	2.22
Test 7	1.34	5.36	0.902	3.61	2.24
Test 8	1.33	5.32	0.895	3.58	2.21
Test 9	1.39	5.56	0.931	3.72	2.31
Test10	1.36	5.44	0.917	3.67	2.27
Average Value	1.34	5.38	0.905	3.62	2.24

Validation Dipole SAR Test Results

The results have been normalized to 1W (forward power) into the dipole.

Averaged over 1cm (1g) of tissue: 5.38 mW/g

Averaged over 10cm (10g) of tissue: 3.62 mW/g

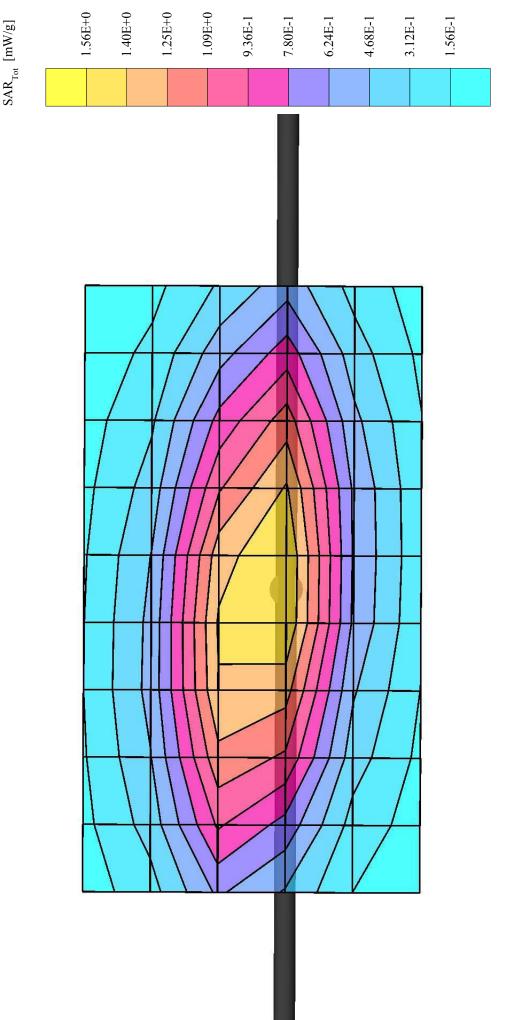
10/17/02

Dipole 450 MHz, d = 15 mm

Frequency: 450 MHz; Antenna Input Power: 250 [mW] I area Planar Dhantom: Planar Section

Probe: ET3DV6 - SN1387; ConvF(7.30,7.30); Crest factor: 1.0; 450 MHz Brain: $\sigma = 0.88$ mho/m $\epsilon_r = 44.1$ $\rho = 1.00$ g/cm³ Large Planar Phantom; Planar Section

Cube 5x5x7: Peak: 2.24 mW/g, SAR (1g): 1.34 mW/g, SAR (10g): 0.905 mW/g, (Worst-case extrapolation) Penetration depth: 12.0 (10.5, 14.0) [mm]; Powerdrift: 0.01 dB; Ambient Temp.: 23.3°C; Fluid Temp.: 22.2°C Calibration Date: October 17, 2002



450MHz System Validation Measured Fluid Dielectric Parameters (Brain) October 17, 2002

Frequency		e'	e''
350.000000	MHz	46.6334	40.6323
360.000000	MHz	46.3629	40.0034
370.000000	MHz	46.1498	39.3672
380.000000	MHz	45.8833	38.6723
390.000000	MHz	45.5947	38.0484
400.000000	MHz	45.3226	37.4538
410.000000	MHz	45.0977	36.9636
420.000000	MHz	44.8241	36.4841
430.000000	MHz	44.5839	35.9541
440.000000	MHz	44.3183	35.5098
450.00000	MHz	<mark>44.0572</mark>	<mark>35.0854</mark>
460.000000	MHz	43.8600	34.7069
470.000000	MHz	43.6544	34.3371
480.000000	MHz	43.4507	33.9296
490.000000	MHz	43.2880	33.5147
500.000000	MHz	43.0921	33.1731
510.000000	MHz	42.8781	32.7813
520.000000	MHz	42.6765	32.4193
530.000000	MHz	42.5864	32.1000
540.000000	MHz	42.4644	31.7180
550.000000	MHz	42.3042	31.4503



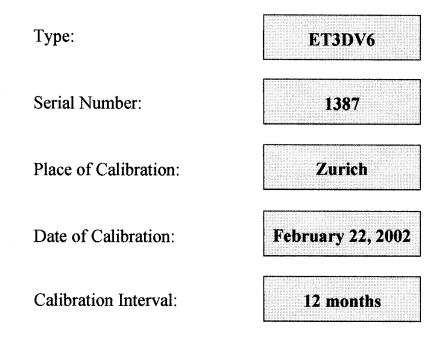
APPENDIX D - PROBE CALIBRATION

Schmid & Partner Engineering AG

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

Calibration Certificate

Dosimetric E-Field Probe



Schmid & Partner Engineering AG hereby certifies, that this device has been calibrated on the date indicated above. The calibration was performed in accordance with specifications and procedures of Schmid & Partner Engineering AG.

Wherever applicable, the standards used in the calibration process are traceable to international standards. In all other cases the standards of the Laboratory for EMF and Microwave Electronics at the Swiss Federal Institute of Technology (ETH) in Zurich, Switzerland have been applied.

Calibrated by:



Approved by:

Probe ET3DV6

SN:1387

Manufactured: Last calibration: Recalibrated: September 21, 1999 September 22, 1999 February 22, 2002

Calibrated for System DASY3

Sensitivity in Free Space

DASY3 - Parameters of Probe: ET3DV6 SN:1387

NormX	1.58 μV/(V/m) ²	DCP X	97	mV
NormY	1.67 μV/(V/m) ²	DCP Y	97	mV
NormZ	1.67 μV/(V/m) ²	DCP Z	97	mV

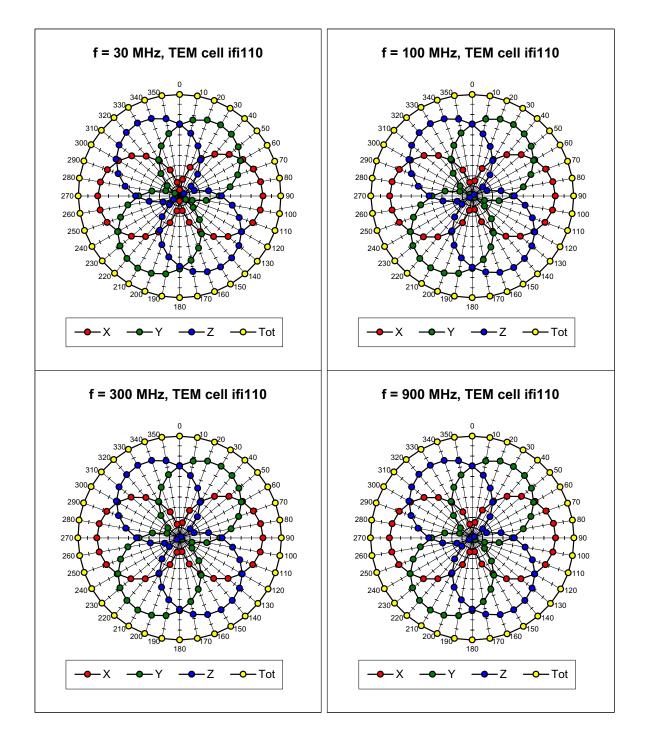
Diode Compression

Sensitivity in Tissue Simulating Liquid

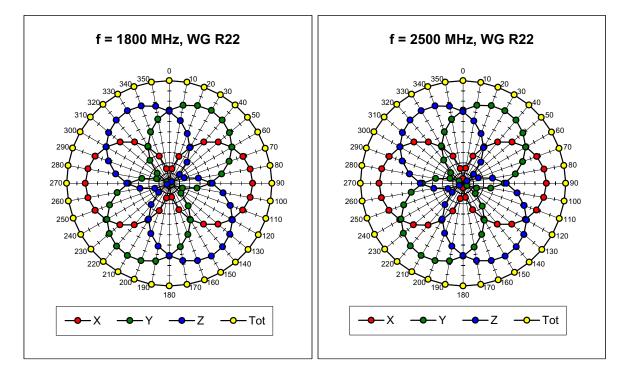
Head Head	900 MHz 835 MHz	$\epsilon_r = 41.5 \pm 5\%$ $\epsilon_r = 41.5 \pm 5\%$	σ = 0.97 ± 5% mho/m σ = 0.90 ± 5% mho/m
	ConvF X	6.6 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	6.6 ± 9.5% (k=2)	Alpha 0.40
	ConvF Z	6.6 ± 9.5% (k=2)	Depth 2.38
Head Head	1800 MHz 1900 MHz	$\varepsilon_r = 40.0 \pm 5\%$ $\varepsilon_r = 40.0 \pm 5\%$	σ = 1.40 ± 5% mho/m σ = 1.40 ± 5% mho/m
	ConvF X	5.4 ± 9.5% (k=2)	Boundary effect:
	ConvF X ConvF Y	5.4 ± 9.5% (k=2) 5.4 ± 9.5% (k=2)	Boundary effect: Alpha 0.57

Boundary Effect

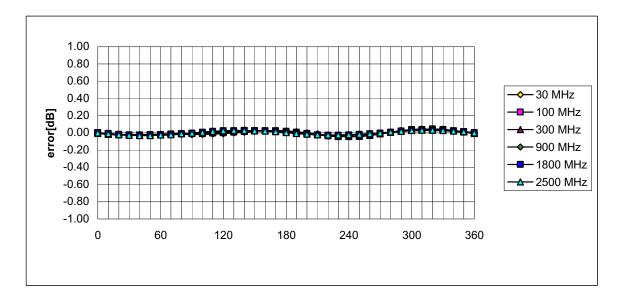
Head	900	MHz	Typical SAR gradien	t: 5 % per n	nm	
		Without Co	prrection Algorithm ction Algorithm		1 mm 9.7 0.3	2 mm 5.4 0.6
Head	1800	MHz	Typical SAR gradien	t: 10 % per	mm	
		Without Co	prrection Algorithm ction Algorithm		1 mm 11.5 0.1	2 mm 7.3 0.3
Sensor	Offset					
	Probe Tip to Optical Surf			2.7 1.3 ± 0.2		mm mm



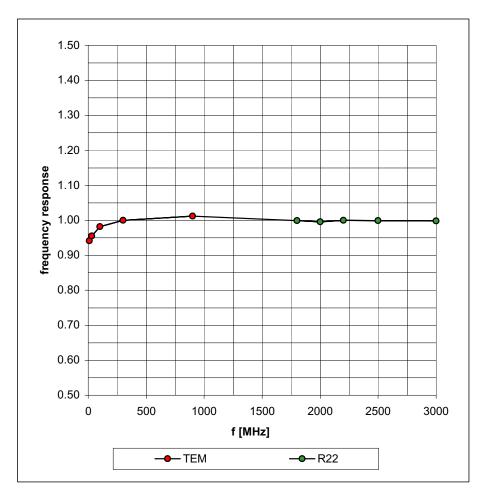
Receiving Pattern (ϕ , θ = 0°



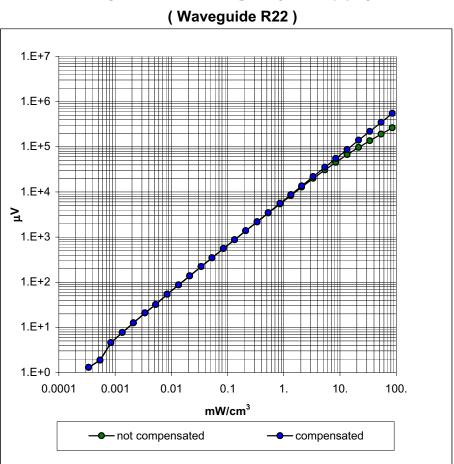
Isotropy Error (ϕ), $\theta = 0^{\circ}$



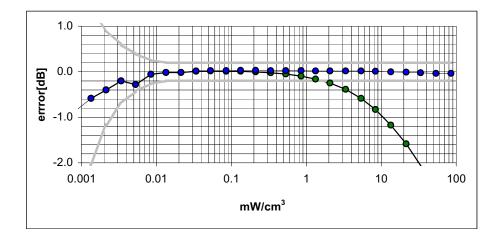
Frequency Response of E-Field

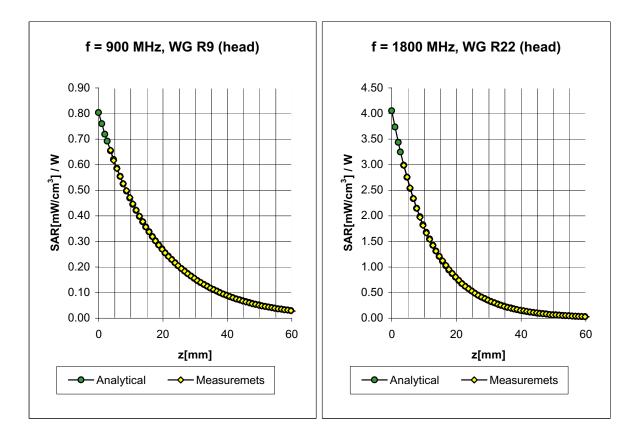


(TEM-Cell:ifi110, Waveguide R22)









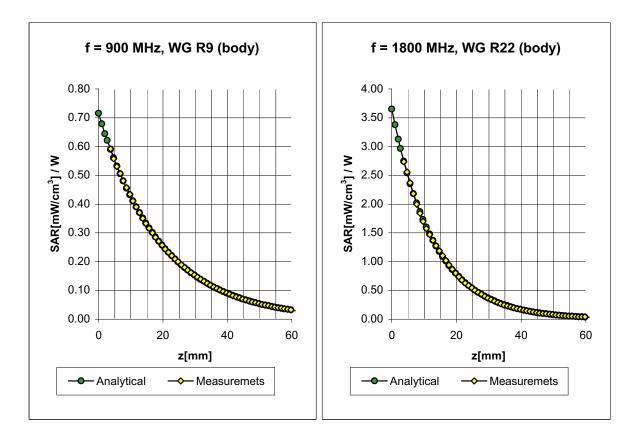
Conversion Factor Assessment

Head	900 MHz		ε_r = 41.5 ± 5%	σ=	• 0.97 ± 5% mho	/m
Head	835 MHz		ε_r = 41.5 ± 5%	σ=	• 0.90 ± 5% mho	/m
	ConvF X	6.6	± 9.5% (k=2)		Boundary effect	t:
	ConvF Y	6.6	± 9.5% (k=2)		Alpha	0.40
	ConvF Z	6.6	± 9.5% (k=2)		Depth	2.38

Head	1800 MHz	ε_r = 40.0 ± 5%	σ = 1.40 ± 5% mho/m
Head	1900 MHz	ε_r = 40.0 ± 5%	σ = 1.40 ± 5% mho/m
	ConvF X	5.4 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	5.4 ± 9.5% (k=2)	Alpha 0.57
	ConvF Z	5.4 ± 9.5% (k=2)	Depth 2.18

ET3DV6 SN:1387

February 22, 2002



Conversion Factor Assessment

Body	900 MHz		ε_r = 55.0 ± 5%	σ=	1.05 ± 5% mho	/m
Body	835 MHz		$\epsilon_r = 55.2 \pm 5\%$	σ=	0.97 ± 5% mho	/m
	ConvF X	6.3	± 9.5% (k=2)		Boundary effect	:
	ConvF Y	6.3	± 9.5% (k=2)		Alpha	0.42
	ConvF Z	6.3	± 9.5% (k=2)		Depth	2.44

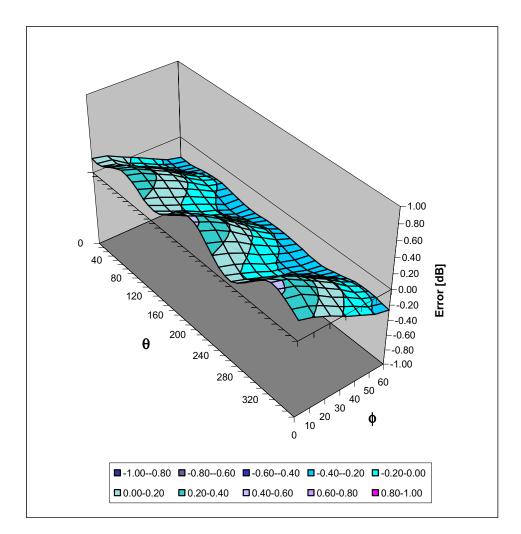
Body	1800 MHz	$\varepsilon_r = 53.3 \pm 5\%$	σ = 1.52 ± 5% mho/m
Body	1900 MHz	$\varepsilon_r = 53.3 \pm 5\%$	σ = 1.52 ± 5% mho/m
	ConvF X	5.0 ± 9.5% (k=2)	Boundary effect:
	ConvF Y	5.0 ± 9.5% (k=2)	Alpha 0.76
	ConvF Z	5.0 ± 9.5% (k=2)	Depth 2.01

ET3DV6 SN:1387

February 22, 2002

Deviation from Isotropy in HSL

Error ($\theta \phi$), f = 900 MHz



Schmid & Partner Engineering AG

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

Additional Conversion Factors

for Dosimetric E-Field Probe

Type:	ET3DV6
Serial Number:	1387
Place of Assessment:	Zurich
Date of Assessment:	February 25, 2002
Probe Calibration Date:	February 22, 2002

Schmid & Partner Engineering AG hereby certifies that conversion factor(s) of this probe have been evaluated on the date indicated above. The assessment was performed using the FDTD numerical code SEMCAD of Schmid & Partner Engineering AG. Since the evaluation is coupled with measured conversion factors, it has to be recalculated yearly, i.e., following the re-calibration schedule of the probe. The uncertainty of the numerical assessment is based on the extrapolation from measured value at 900 MHz or at 1800 MHz.

Assessed by:

Musie Katja

Dosimetric E-Field Probe ET3DV6 SN:1387

Conversion Factor (\pm standard deviation)

150 MHz	ConvF	9.2 <u>+</u> 8%	$\epsilon_r = 52.3$ $\sigma = 0.76$ mho/m (head tissue)
300 MHz	ConvF	8.0 <u>+</u> 8%	$\epsilon_r = 45.3$ $\sigma = 0.87$ mho/m (head tissue)
450 MHz	ConvF	7.3 <u>+</u> 8%	$\epsilon_r = 43.5$ $\sigma = 0.87$ mho/m (head tissue)
2450 MHz	ConvF	4.7 <u>+</u> 8%	$\epsilon_r = 39.2$ $\sigma = 1.80$ mho/m (head tissue)
150 MHz	ConvF	8.8 <u>+</u> 8%	$\epsilon_r = 61.9$ $\sigma = 0.80 \text{ mho/m}$ (body tissue)
450 MHz	ConvF	7.7 <u>+</u> 8%	$\epsilon_r = 56.7$ $\sigma = 0.94$ mho/m (body tissue)
2450 MHz	ConvF	4.3 <u>+</u> 8%	$\epsilon_r = 52.7$ $\sigma = 1.95$ mho/m (body tissue)



APPENDIX E - MEASURED FLUID DIELECTRIC PARAMETERS

450MHz System Performance Check & DUT Evaluation (Face) Measured Fluid Dielectric Parameters (Brain) December 20, 2002

350.000000MHz46.907839.8254360.000000MHz46.688439.1511370.000000MHz46.400238.4771380.000000MHz46.107637.9161390.000000MHz45.835637.3281400.000000MHz45.567836.8319410.000000MHz45.046335.8302420.000000MHz45.046335.8302430.000000MHz44.772335.3279440.000000MHz44.566034.9439450.000000MHz44.312334.5004460.000000MHz43.919933.7521
370.000000 MHz 46.4002 38.4771 380.000000 MHz 46.1076 37.9161 390.000000 MHz 45.8356 37.3281 400.000000 MHz 45.5678 36.8319 410.000000 MHz 45.3067 36.2982 420.000000 MHz 45.0463 35.8302 430.000000 MHz 44.7723 35.3279 440.000000 MHz 44.5660 34.9439 450.000000 MHz 44.3123 34.5004 460.000000 MHz 43.9199 33.7521
380.000000 MHz 46.1076 37.9161 390.000000 MHz 45.8356 37.3281 400.000000 MHz 45.5678 36.8319 410.000000 MHz 45.3067 36.2982 420.000000 MHz 45.0463 35.8302 430.000000 MHz 44.7723 35.3279 440.000000 MHz 44.5660 34.9439 450.000000 MHz 44.3123 34.5004 460.000000 MHz 43.9199 33.7521
390.000000MHz45.835637.3281400.000000MHz45.567836.8319410.000000MHz45.306736.2982420.000000MHz45.046335.8302430.000000MHz44.772335.3279440.000000MHz44.566034.9439450.000000MHz44.312334.5004460.000000MHz44.147234.1452470.000000MHz43.919933.7521
400.00000 MHz45.567836.8319410.000000 MHz45.306736.2982420.000000 MHz45.046335.8302430.000000 MHz44.772335.3279440.000000 MHz44.566034.9439450.000000 MHz44.312334.5004460.000000 MHz44.147234.1452470.000000 MHz43.919933.7521
410.000000MHz45.306736.2982420.000000MHz45.046335.8302430.000000MHz44.772335.3279440.000000MHz44.566034.9439450.000000MHz44.312334.5004460.000000MHz44.147234.1452470.000000MHz43.919933.7521
420.000000MHz45.046335.8302430.000000MHz44.772335.3279440.000000MHz44.566034.9439450.000000MHz44.312334.5004460.000000MHz44.147234.1452470.000000MHz43.919933.7521
430.000000MHz44.772335.3279440.000000MHz44.566034.9439450.000000MHz44.312334.5004460.000000MHz44.147234.1452470.000000MHz43.919933.7521
440.000000 MHz44.566034.9439450.000000 MHz44.312334.5004460.000000 MHz44.147234.1452470.000000 MHz43.919933.7521
450.000000 MHz44.312334.5004460.000000 MHz44.147234.1452470.000000 MHz43.919933.7521
460.000000 MHz44.147234.1452470.000000 MHz43.919933.7521
470.000000 MHz 43.9199 33.7521
480.000000 MHz 43.7411 33.3324
490.000000 MHz 43.5177 32.9199
500.000000 MHz 43.2967 32.5751
510.000000 MHz 43.1022 32.2397
520.000000 MHz 42.9675 31.9235
530.000000 MHz 42.6931 31.6117
540.000000 MHz 42.5678 31.2380
550.000000 MHz 42.3655 30.9775

450MHz DUT Evaluation (Body) Measured Fluid Dielectric Parameters (Muscle)

T			
Frequency		e'	e''
350.000000	MHz	60.7614	45.2557
360.000000	MHz	60.5992	44.4327
370.000000	MHz	60.4044	43.5873
380.000000	MHz	60.2459	42.8444
390.000000	MHz	60.0786	42.0832
400.000000	MHz	59.8765	41.4495
410.000000	MHz	59.7041	40.8181
420.000000	MHz	59.5235	40.2162
430.000000	MHz	59.3178	39.6052
440.000000	MHz	59.1906	39.0534
450.000000	MHz	59.0227	38.5610
460.000000	MHz	58.9227	38.0456
470.000000	MHz	58.8270	37.5762
480.000000	MHz	58.6969	37.0585
490.000000	MHz	58.5010	36.6283
500.000000	MHz	58.4492	36.1813
510.000000	MHz	58.3001	35.7544
520.000000	MHz	58.1631	35.3565
530.000000	MHz	57.9980	35.0291
540.000000	MHz	57.9640	34.5410
550.000000	MHz	57.7584	34.2074
220.000000	140.2	JI.IJ01	JI.40/1



APPENDIX F - SAM PHANTOM CERTIFICATE OF CONFORMITY

Schmid & Partner Engineering AG

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

Certificate of conformity / First Article Inspection

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

Tests

The series production process used allows the limitation to test of first articles.

Complete tests were made on the pre-series Type No. QD 000 P40 AA, Serial No. TP-1001 and on the series first article Type No. QD 000 P40 BA, Serial No. TP-1006. Certain parameters have been retested using further series units (called samples).

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

Standards

- [1] CENELEC EN 50361
- [2] IEEE P1528-200x draft 6.5
- [3] IEC PT 62209 draft 0.9
- (*) The IT'IS CAD file is derived from [2] and is also within the tolerance requirements of the shapes of [1] and [3].

Conformity

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

Date 18.11.2001 Schmid & Partner Fin Bruholt : lā Signature / Stame Engineering AG Zeughausstrasse 43, CH-8004 Zurich Tel. +41 1 245 97 00, Fax +41 1 245 97 79



APPENDIX G - SAR TEST SETUP AND DUT PHOTOGRAPHS

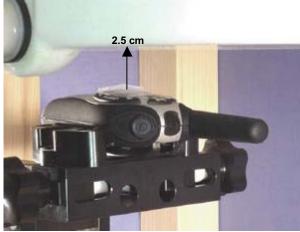


FACE-HELD SAR TEST SETUP PHOTOGRAPHS 2.5cm Separation Distance





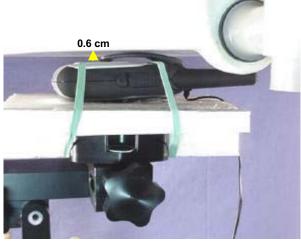




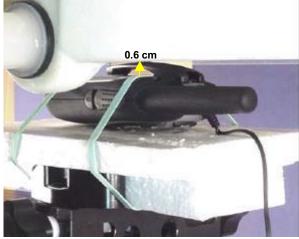


BODY-WORN SAR TEST SETUP PHOTOGRAPHS with 0.6 cm Belt-Clip & Lapel Ear-Microphone Accessory





0.6 cm





DUT PHOTOGRAPHS









Front of DUT

Back of DUT & Belt-Clip

DUT with Alkaline Batteries

DUT with Lapel Ear-Microphone



Right Side of DUT & Belt-Clip



Left Side of DUT & Belt-Clip