



February 6th, 2002

FCC ID: **O2SNURIT8000RI**
FCC Application Processing Branch
Correspondence Reference Number: **21554**
731 Confirmation Number: **EA102793**

Attn: **Mr. Stan Lyles**

With respect to your recent queries concerning this application, please find following the information you have requested for clarification on certain items.

1. SAR tests on this device commenced in early September just before the first TCB SAR training session and the guidelines on tissue parameters given to us at that time by Mr. Kwok Chan, was to employ tissue parameters that gave the highest conductivity value listed on the FCC website, the Motorola, IEEE and CENELC documents. We are now using the IEEE P1528 standard for all tissue parameters and procedures. The change in the maximum SAR value stated in the report due to the new conductivity parameters would result in a lower SAR than measured by a factor of 0.99/1.40 (70% overestimate) which would result in a maximum compensated SAR of **0.65W/Kg**.
2. The Tissue used had a conductivity of 1.40 and a dielectric constant of 50.9. The fields in the SAR summaries were not updated from a previous SAR test. The conductivity entered in the SAR summary does not affect the SAR values obtained in the report and are only for reporting purposes. The affected pages will be corrected to indicate the actual tissue parameters used.
3. Dipoles and flat phantoms to perform the validation are being procured but was unavailable in September 2001 when the tests were performed. Attenuation vs. Depth plots taken at 1mm intervals are available and will be included in the updated SAR measurements.
4. The system is calibrated using a CW signal. We carried out an SAR test on a dipole fed with a 25% duty cycle signal with the power adjusted to give the same average power as a CW signal. Our findings are as follows;

100%	8.659 W/Kg
25% (10ms/40ms)	9.272 W/Kg

The above results indicated that the system provides a SAR overestimate of

$$(9.272-8.659)/8.659 \times 100\% = 7\%$$

for 25% duty cycle pulse modulated signals.

3000 Bristol Circle,
Oakville, Ontario, Canada
L6H 6G4

Telephone (905) 829-1570
Facsimile (905) 829-8050

Website: www.ultratech-labs.com
Email: vhk.ultratech@sympatico.ca



5. The power level for the RIM RF modem cannot be adjusted for each channel separately and the measurements we obtained on this sample indicate that the maximum conducted power occurred at 896MHz. The SAR was tested at this channel/power level and it was found to be lower than the 901MHz channel. A possible explanation to this is that the antenna gain over the band is not flat and the antenna may have a higher gain at 901MHz than at 896MHz.

6. It is assumed that the gain of a $\lambda/2$ dipole relative to an isotropic radiator is +2.15 dBi. Therefore, the calculation of erp is as follows:

$$\text{erp} = P_s + A$$

P_s = Power level of the signal generator (including cable loss from signal generator to antenna);

A = Antenna gain (relative to $\lambda/2$ dipole) = dBd;

$$\text{dBd} = \text{dBi} - 2.15$$

$$\rightarrow \text{erp} = P_s + [(\text{substitution dipole antenna gain in dBi}) - 2.15]$$

The above formula was used to obtain the erp results on page 10.

7. The measured Peak ERP value will be excluded from page 10 of the test report since it is not necessary.

Should there be any further clarifications required, please do not hesitate to contact me at your earliest convenience.

Best Regards,

Victor H. Kee, P.Eng

Attach.

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Facsimile (905) 829-8050

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Email: vhk.ultratech@sympatico.ca

Point of Sale Device, Model No.: NURIT 8000 RIM

FCC ID: O2SNURIT8000RI

EXHIBIT 4. MEASUREMENTS, EXAMINATIONS & TEST DATA

4.1. TEST SETUP

EUT Information		Condition	
Radio Type	Point of Sale	Robot Type	6 Axis
Model Number	NURIT 8000 RIM	Scan Type	SAR - Area/Zoom
Serial Number	Test Sample	Measured Field	E
Frequency Band (MHz)	896 - 901 MHz	Phantom Type	Open Back Full Body
Frequency Tested (MHz)	896 and 901	Phantom Position	Waist
Nominal Output Power (W)	2 (at antenna terminal)	Room Temperature	24°C
Antenna Type	1. Integrated pcb mount	Room Humidity	35%
Signal Type	25% CW	Tissue Temperature	23°C
Duty Cycle	25%		

Type of Tissue	Muscle
Target Frequency (MHz)	900
Target Dielectric Constant	51.1
Target Conductivity (S/m)	1.21
Composition (by weight)	DI Water (40.97 %) Sugar (49.88 %) Salt (8.91%) HEC (0.14 %) Bactericide (0.10%)
Measured Dielectric Constant	50.9
Measured Conductivity (S/m)	1.40
Probe Name	E
Probe Orientation	Isotropic
Probe Offset (mm)	2.25
Sensor Factor	10.8
Conversion Factor	0.880
Calibration Date (MM/DD/YY)	14/06/2001

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Tel. #: 905-829-1570, Fax. #: 905-829-8050, Email: yhk.ultratech@sympatico.ca, Website: <http://www.ultratech-labs.com>File #: LIP7-SAR
September 21, 2001

- Assessed by ITI (UK) Competent Body, NVLAP (USA) Accreditation Body & ACA/AUSTEL (Australia), VCCI (Japan)
- Accredited by Industry Canada (Canada) under ACC-LAB (Europe/Canada MRA and APEC/Canada MRA)
- Recognized/Listed by FCC (USA)
- All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

EXHIBIT 8. 896 MHz SAR MEASUREMENT

Test data for 896 MHz SAR measurements are presented in following order:

Back surface of EUT parallel to phantom waist:

- ▶ In contact with phantom
- ▶ 15 mm away from phantom
- ▶ 25 mm away from phantom

Top surface of EUT parallel to phantom waist:

- ▶ In contact with phantom
- ▶ 15 mm away from phantom
- ▶ 25 mm away from phantom

Detailed SAR Results with EUT relocated for maximum contact with phantom surface

EUT Configurations	EUT separation distance to phantom (mm)	Antenna Position	SAR (W/kg) Device Test Frequency & Output
			896 MHz 1950 mW (at antenna terminal)
Back surface of EUT parallel to phantom waist	0	Internal	3.391
	15	Internal	0.842
	25	Internal	0.410
Top surface of EUT parallel to phantom waist	0	Internal	0.769
	15	Internal	0.079
	25	Internal	0.004

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File #: LIP7-SAR
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Test Information

Date : 06/09/2001

Time : 3:16:30 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 896
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.95
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.950

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -10

Y = 20

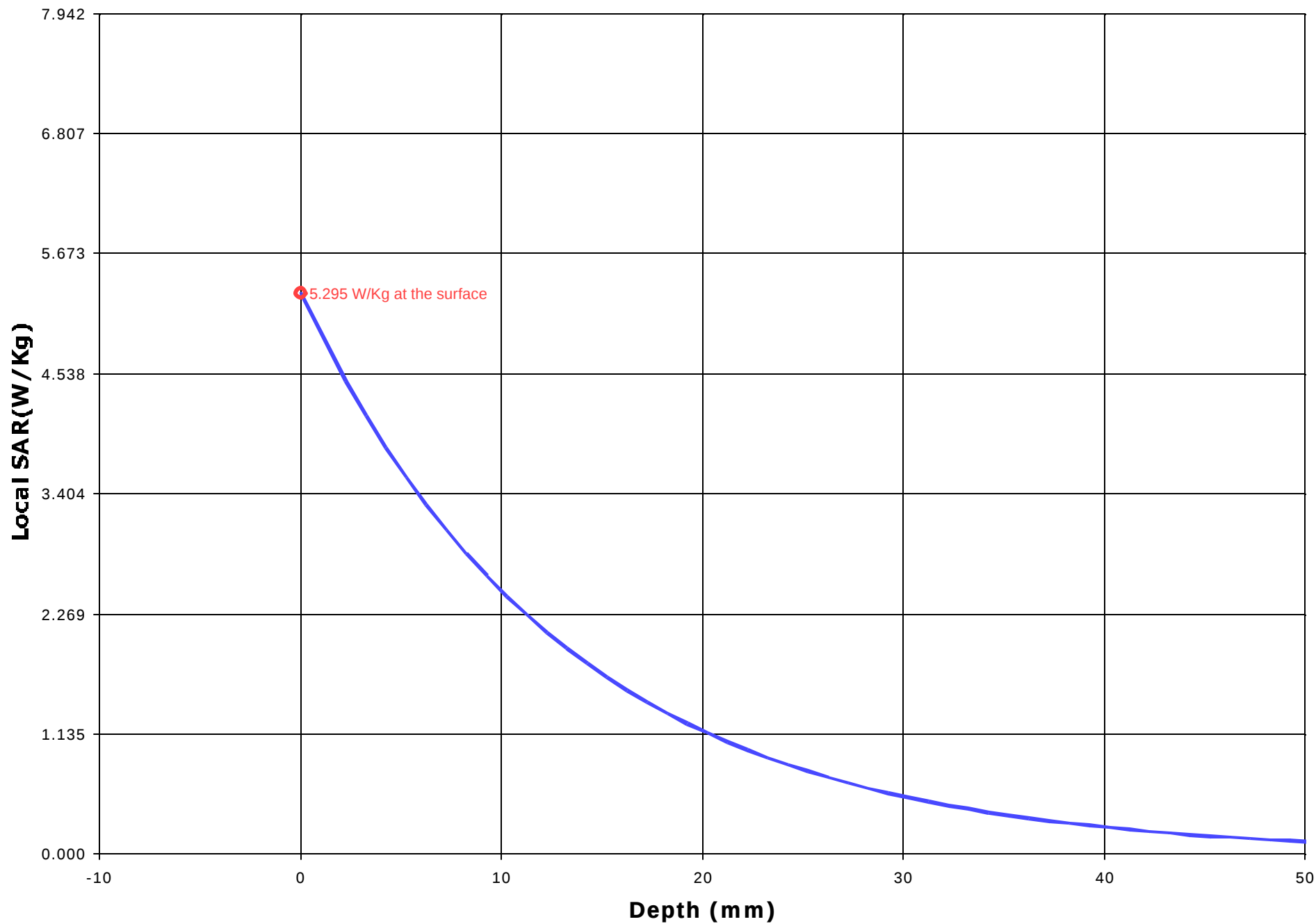
Measured Values (mV) :

55.523	53.046	53.159	51.230	46.520	42.946
40.041	36.184	31.431	28.174	25.828	

Peak Voltage (mV) : 64.972

1 Cm Voltage (mV) : 30.482

SAR (W/Kg) : 3.391



Test Information

Date : 12/09/2001

Time : 3:15:06 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 896
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.95
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.950

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -25

Y = 25

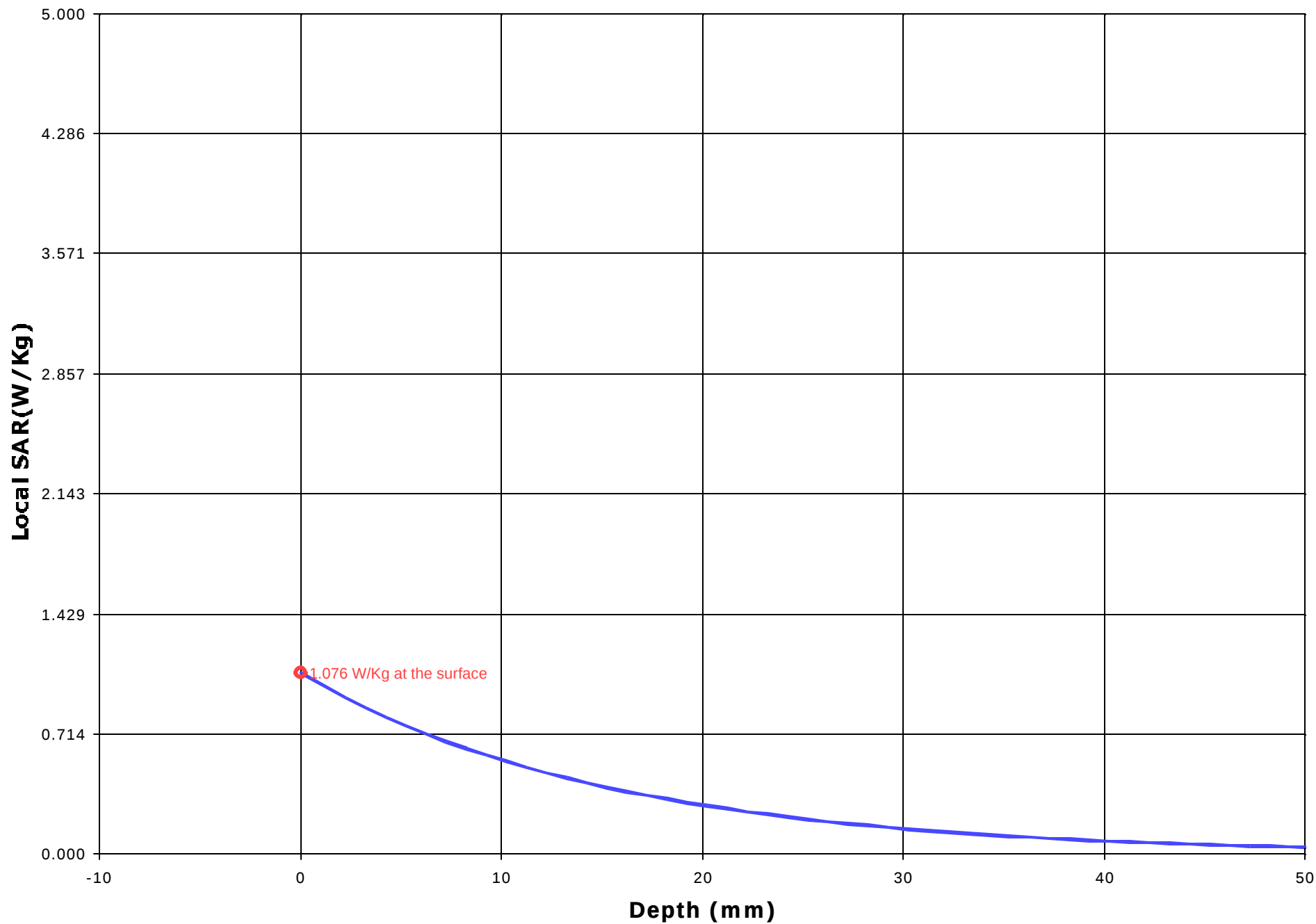
Measured Values (mV) :

11.491	11.531	10.810	10.749	10.439	9.926
8.758	7.966	7.716	7.123	6.600	

Peak Voltage (mV) : 13.199

1 Cm Voltage (mV) : 6.874

SAR (W/Kg) : 0.842



Test Information

Date : 12/09/2001

Time : 2:39:18 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 896
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.95
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.950

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -20

Y = 30

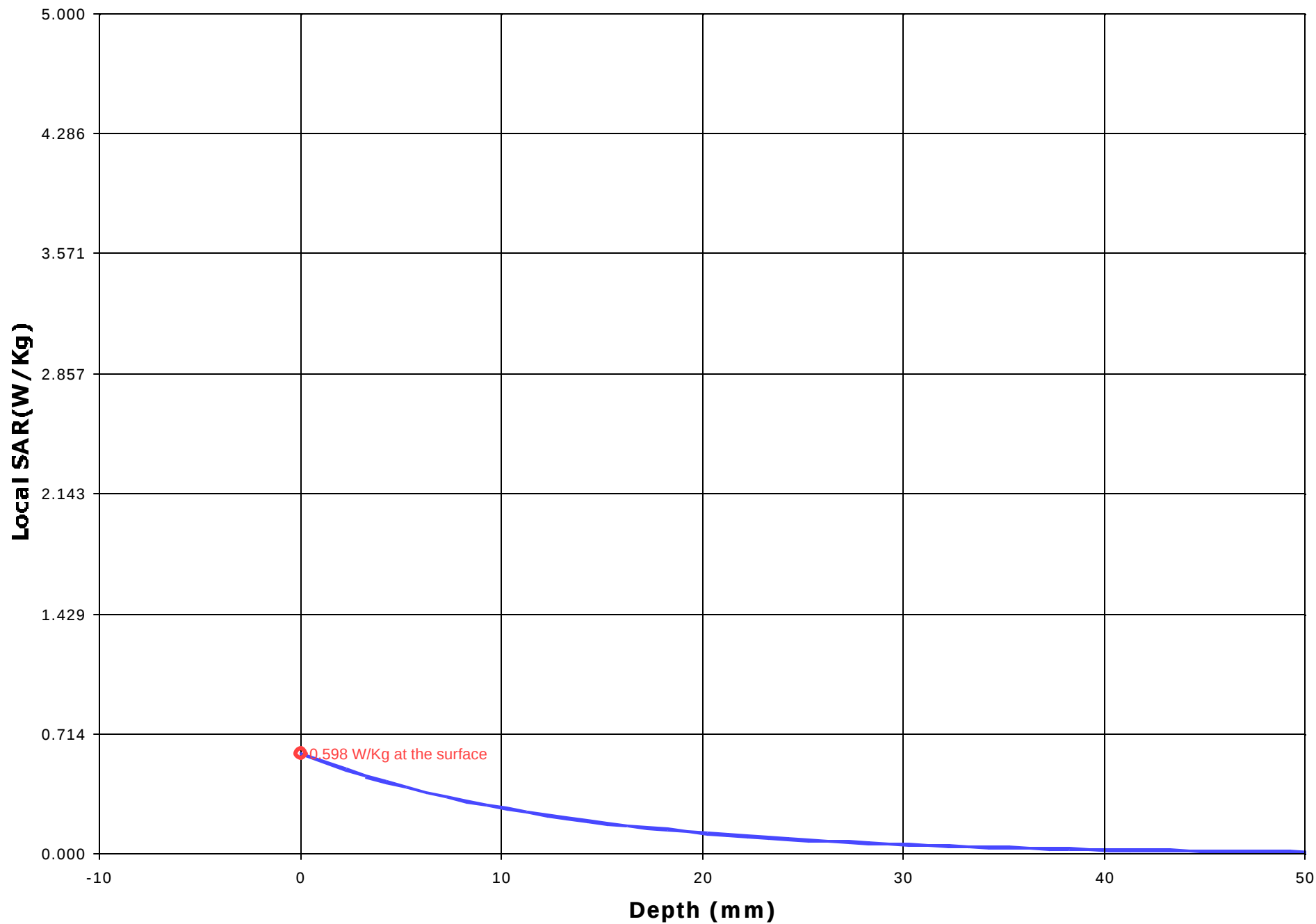
Measured Values (mV) :

6.222	6.180	5.964	5.866	5.242	4.851
4.477	4.082	3.696	3.296	2.925	

Peak Voltage (mV) : 7.334

1 Cm Voltage (mV) : 3.377

SAR (W/Kg) : 0.410



Test Information

Date : 06/09/2001

Time : 2:45:51 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 896
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.95
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.950

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -5

Y = 40

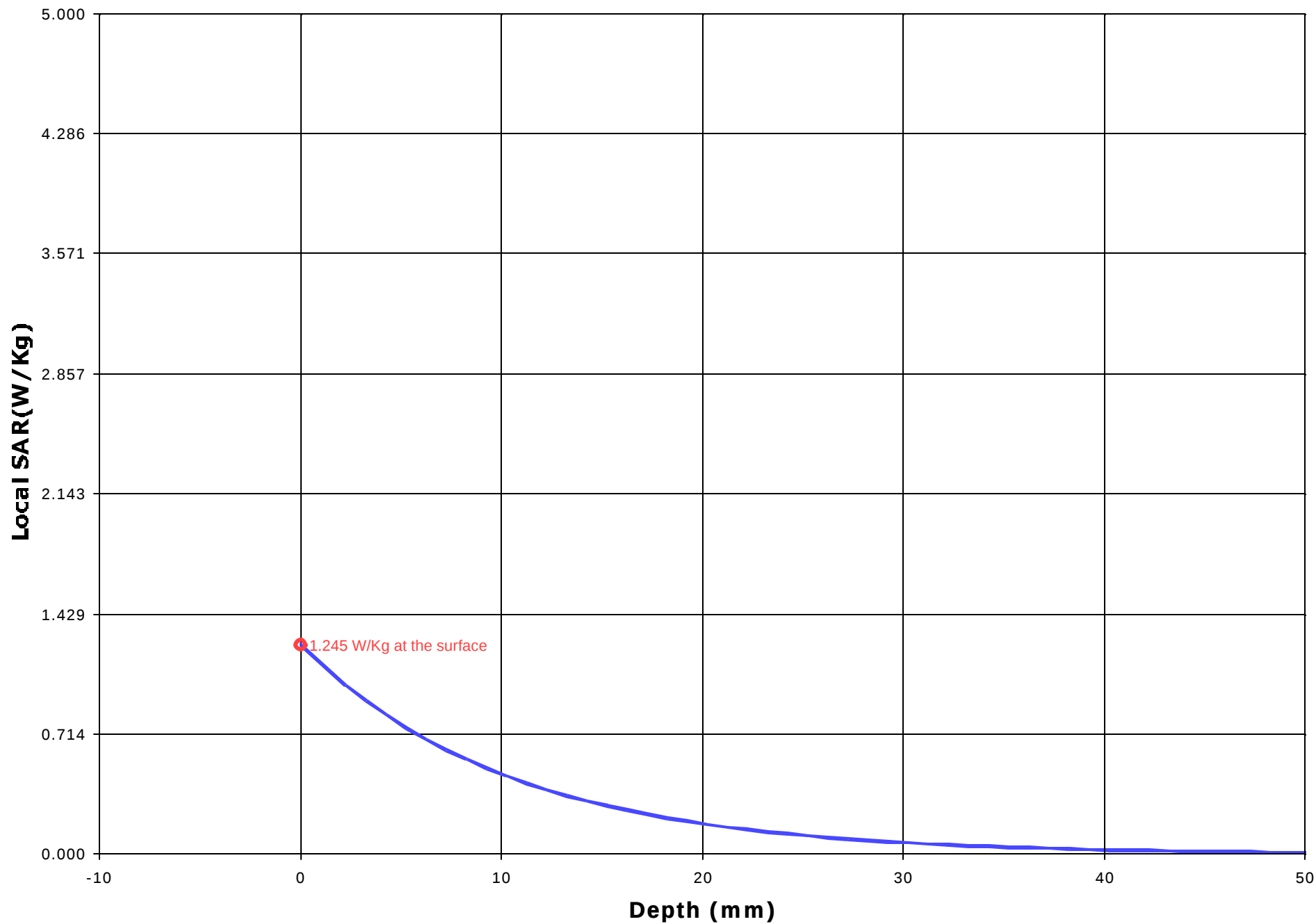
Measured Values (mV) :

12.635	13.292	13.235	12.211	10.740	9.311
8.379	7.409	6.383	5.136	4.357	

Peak Voltage (mV) : 15.278

1 Cm Voltage (mV) : 5.835

SAR (W/Kg) : 0.769



Test Information

Date : 12/09/2001

Time : 4:39:05 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 896
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.95
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.950

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -5

Y = 40

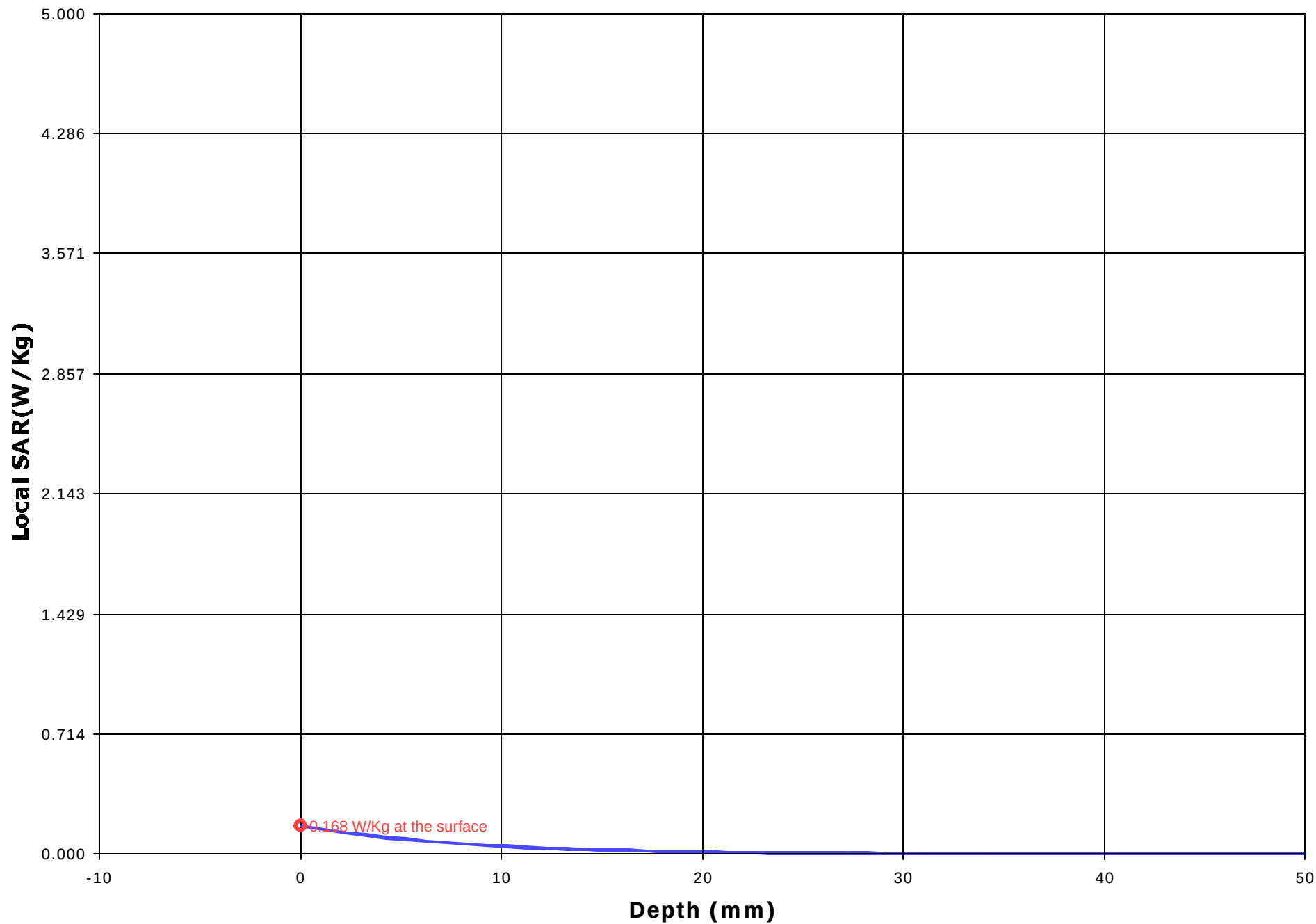
Measured Values (mV) :

1.612	1.664	1.522	1.391	1.187	1.014
0.858	0.640	0.521	0.392	0.332	

Peak Voltage (mV) : 2.062

1 Cm Voltage (mV) : 0.587

SAR (W/Kg) : 0.079



Test Information

Date : 12/09/2001
Time : 11:13:22 AM

<u>Product</u>	: Nurit 8000 & RIM moden module	<u>Test</u>	: SAR
<u>Manufacturer</u>	: LIPMAN USA	<u>Frequency (MHz)</u>	: 896
<u>Model Number</u>	: 8000	<u>Nominal Output Power (W)</u>	: 2
<u>Serial Number</u>	:	<u>Antenna Type</u>	: Patch
<u>FCC ID Number</u>	:	<u>Signal</u>	: 25%

<u>Phantom</u>	: Waist	<u>Dielectric Constant</u>	: 50.9
<u>Simulated Tissue</u>	: Muscle	<u>Conductivity</u>	: 1.40

<u>Probe</u>	: UT-ETR-0200-1(c)	<u>Antenna Position</u>	: Front
<u>Probe Offset (mm)</u>	: 2.250	<u>Measured Power (W)</u>	: 1.95
<u>Sensor Factor (mV)</u>	: 10.8	<u>(conducted)</u>	
<u>Conversion Factor</u>	: 0.880	<u>Cable Insertion Loss (dB)</u>	: 0
<u>Calibrated Date</u>	: 14/06/2001	<u>Compensated Power (W)</u>	: 1.950

Amplifier Setting :
Channel 1 : 0.0056 Channel 2 : 0.0053 Channel 3 : 0.0066

Location of Maximum Field :

X = -5 Y = 40

Measured Values (mV) :

0.113	0.093	0.086	0.066	0.046	0.000
0.000	0.000	0.000	0.000	0.000	

<u>Peak Voltage (mV)</u>	: 0.188	<u>1 Cm Voltage (mV)</u>	: 0.021	<u>SAR (W/Kg)</u>	: 0.004
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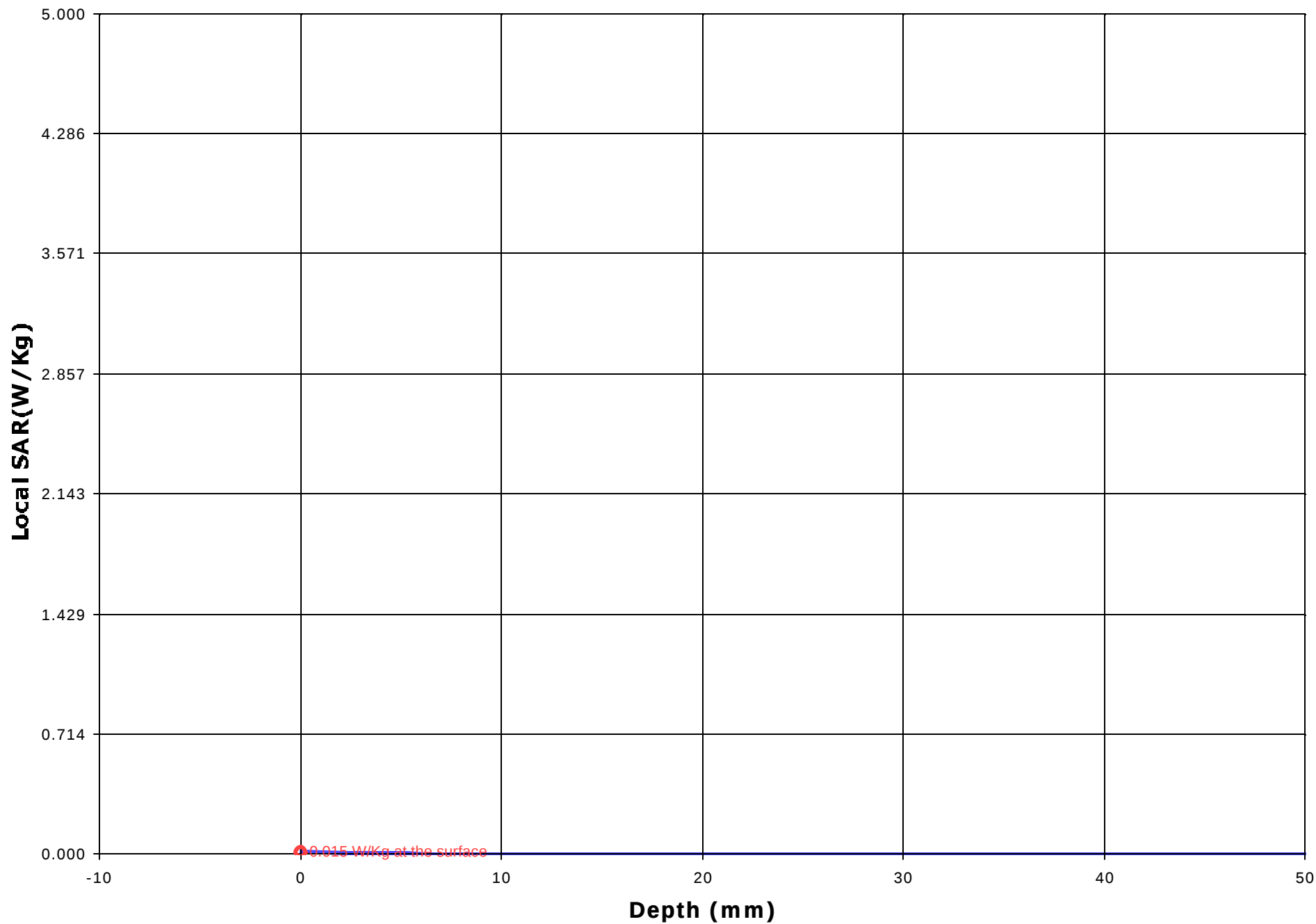


EXHIBIT 9. 901 MHz SAR MEASUREMENT

Test data for 901 MHz SAR measurements are presented in following order:

Back surface of EUT parallel to phantom waist:

- ▶ In contact with phantom
- ▶ 15 mm away from phantom
- ▶ 25 mm away from phantom

Top surface of EUT parallel to phantom waist:

- ▶ In contact with phantom
- ▶ 15 mm away from phantom-
- ▶ 25 mm away from phantom

Detailed SAR Results with EUT relocated for maximum contact with phantom surface

EUT Configurations	EUT separation distance to phantom (mm)	Antenna Position	SAR (W/kg) Device Test Frequency & Output
			901 MHz 1905 mW (at antenna terminal)
Back surface of EUT parallel to phantom waist	0	Internal	3.961
	15	Internal	0.944
	25	Internal	0.308
Top surface of EUT parallel to phantom waist	0	Internal	0.687
	15	Internal	0.077
	25	Internal	0.000

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File #: LIP7-SAR
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Test Information

Date : 06/09/2001

Time : 3:41:45 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 901
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.91
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.910

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

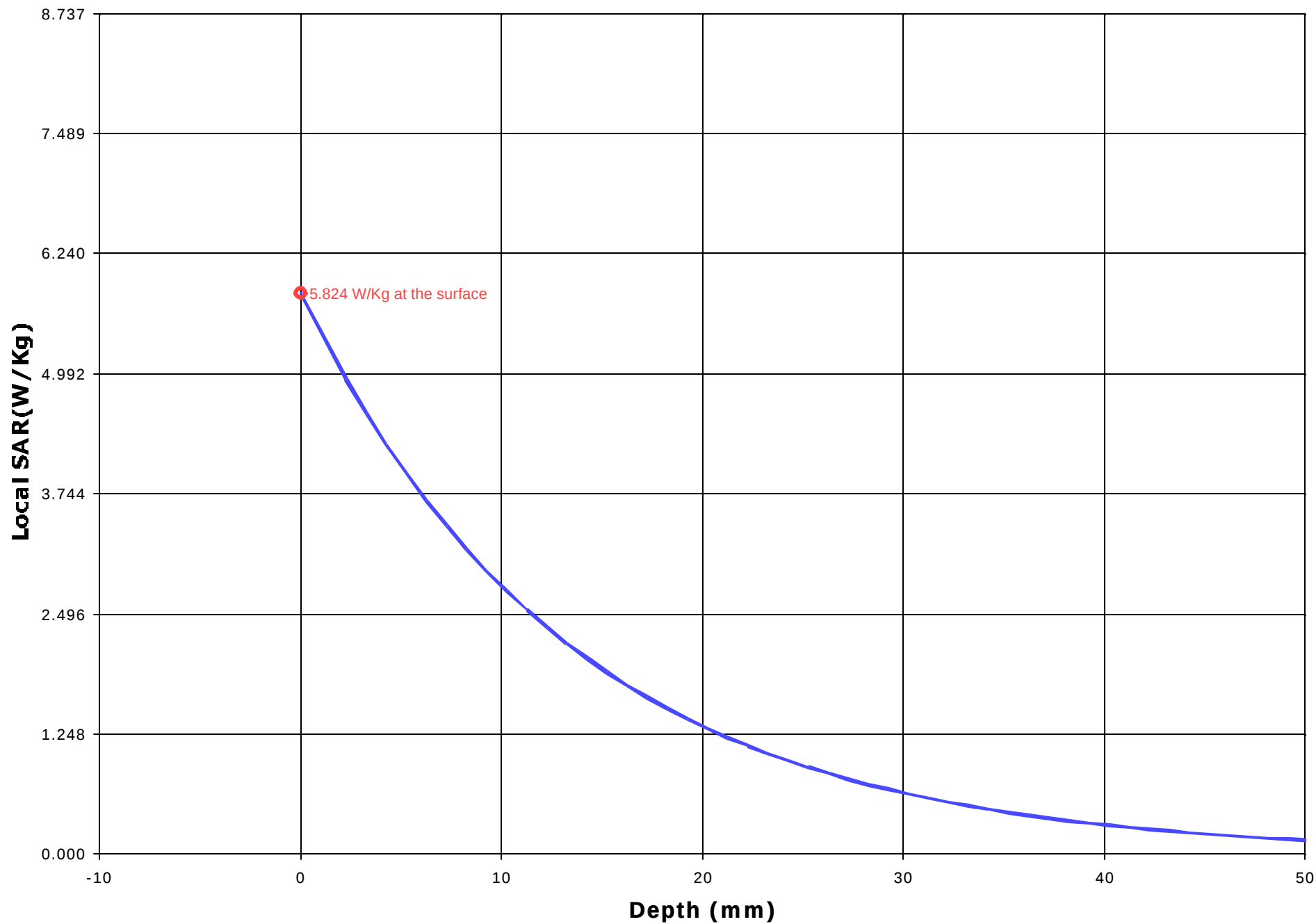
X = -15

Y = 25

Measured Values (mV) :

60.927	58.471	58.062	53.767	50.954	47.085
43.033	39.773	36.677	32.969	30.050	

Peak Voltage (mV) : 71.473 1 Cm Voltage (mV) : 34.175 SAR (W/Kg) : 3.961



Test Information

Date : 12/09/2001

Time : 3:38:52 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 901
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.91
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.910

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -25

Y = 25

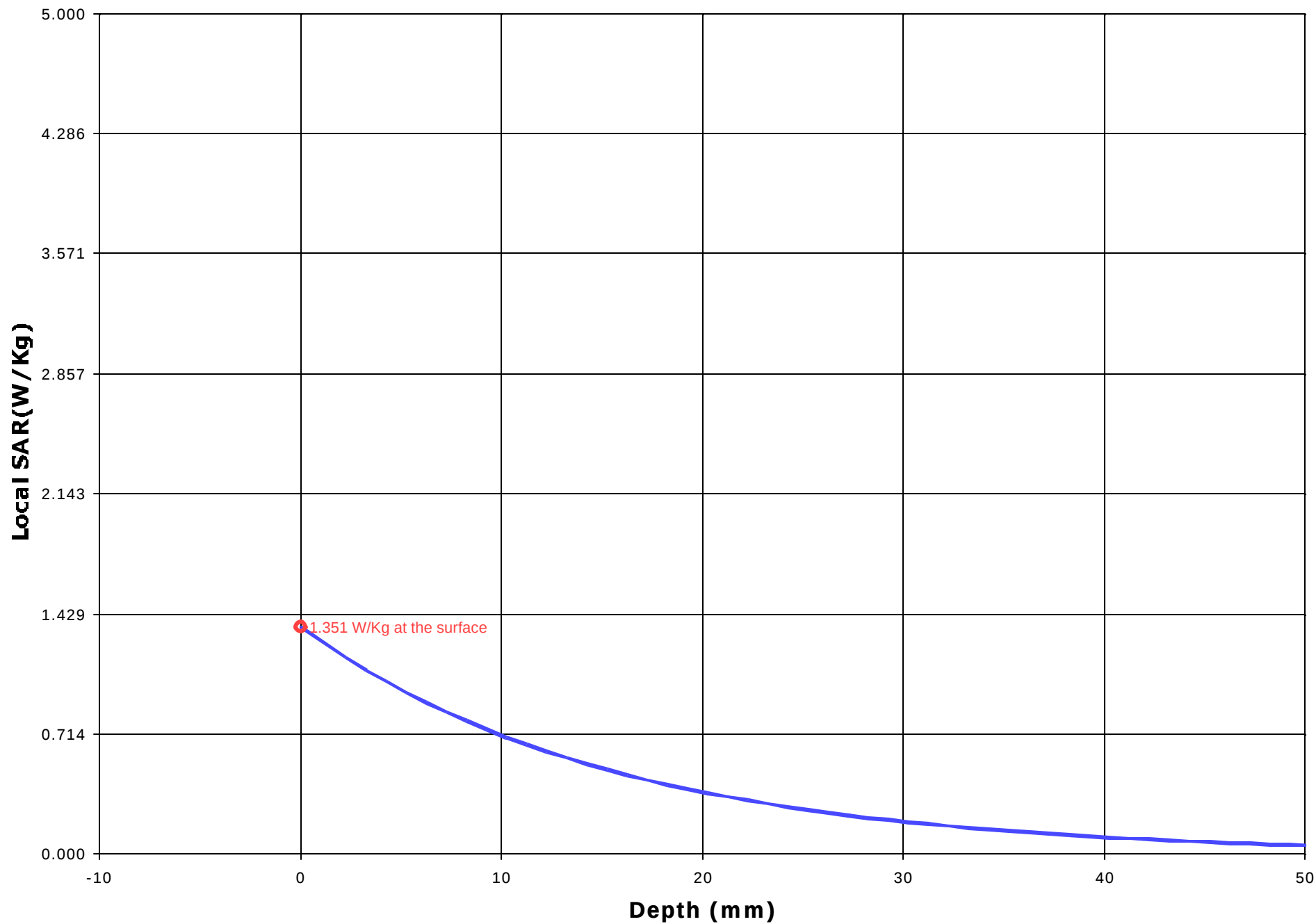
Measured Values (mV) :

14.314	13.534	13.246	13.099	12.262	12.130
10.611	9.978	9.149	8.579	8.000	

Peak Voltage (mV) : 16.580

1 Cm Voltage (mV) : 8.668

SAR (W/Kg) : 0.944



Test Information

Date : 12/09/2001

Time : 1:29:38 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 901
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.91
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.910

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -15

Y = 20

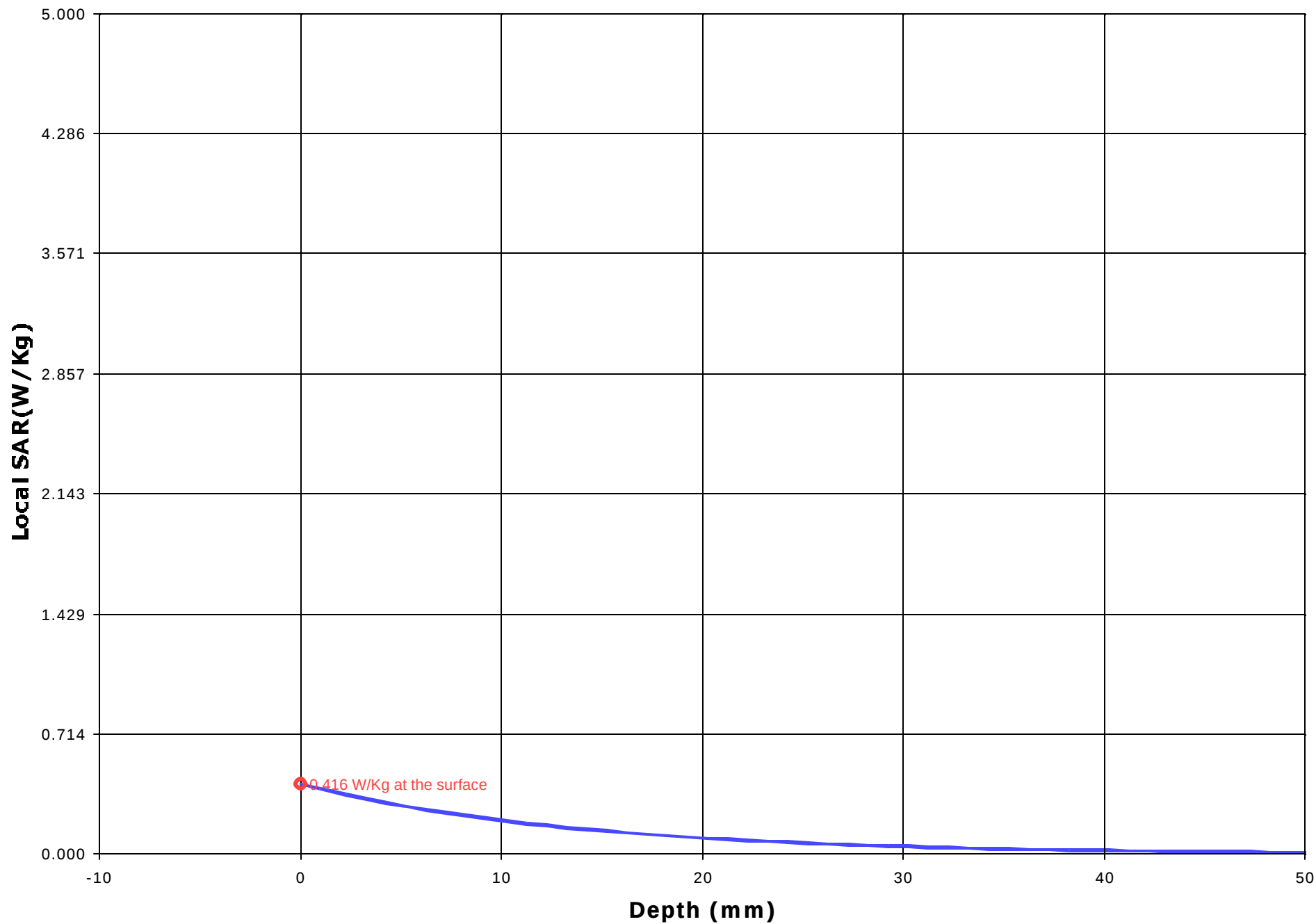
Measured Values (mV) :

4.387	4.803	4.809	4.494	4.053	3.575
3.206	3.010	2.813	2.530	2.241	

Peak Voltage (mV) : 5.110

1 Cm Voltage (mV) : 2.461

SAR (W/Kg) : 0.308



Test Information

Date : 06/09/2001

Time : 4:45:32 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 901
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.91
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.910

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = 0

Y = 35

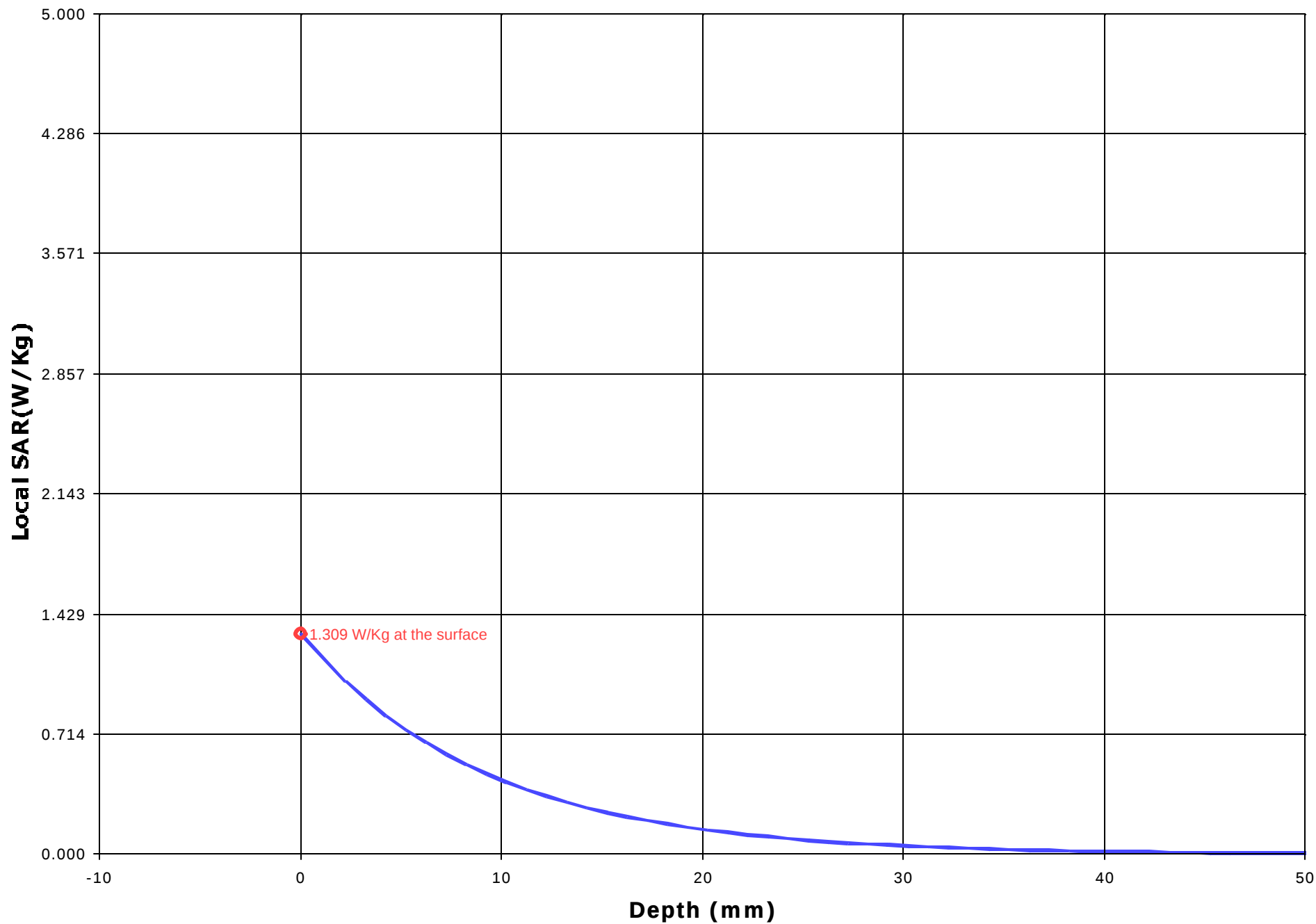
Measured Values (mV) :

12.888	12.981	12.026	10.613	9.790	8.514
7.441	6.324	5.343	4.735	4.181	

Peak Voltage (mV) : 16.063

1 Cm Voltage (mV) : 5.402

SAR (W/Kg) : 0.687



Test Information

Date : 12/09/2001

Time : 4:11:50 PM

Product : Nurit 8000 & RIM moden module
Manufacturer : LIPMAN USA
Model Number : 8000
Serial Number :
FCC ID Number :

Test : SAR
Frequency (MHz) : 901
Nominal Output Power (W) : 2
Antenna Type : Patch
Signal : 25%

Phantom : Waist
Simulated Tissue : Muscle

Dielectric Constant : 50.9
Conductivity : 1.40

Probe : UT-ETR-0200-1(c)
Probe Offset (mm) : 2.250
Sensor Factor (mV) : 10.8
Conversion Factor : 0.880
Calibrated Date : 14/06/2001

Antenna Position : Front
Measured Power (W) : 1.91
(conducted)
Cable Insertion Loss (dB) : 0
Compensated Power (W) : 1.910

Amplifier Setting :

Channel 1 : 0.0056

Channel 2 : 0.0053

Channel 3 : 0.0066

Location of Maximum Field :

X = -5

Y = 40

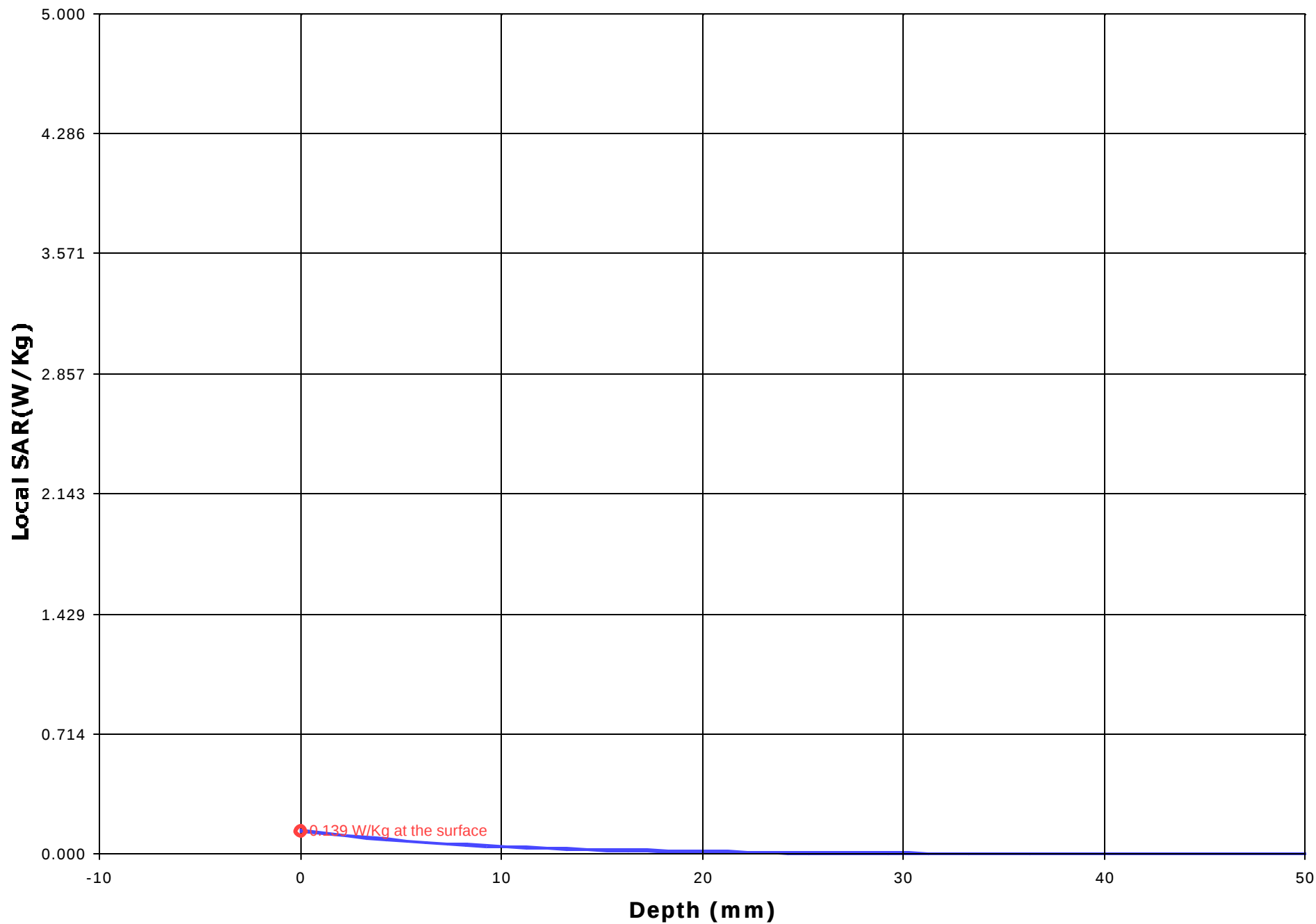
Measured Values (mV) :

1.403	1.495	1.401	1.256	1.137	0.926
0.723	0.617	0.483	0.405	0.325	

Peak Voltage (mV) : 1.710

1 Cm Voltage (mV) : 0.564

SAR (W/Kg) : 0.077



Test Information

Date : 12/09/2001
Time : 11:43:41 AM

<u>Product</u>	: Nurit 8000 & RIM moden module	<u>Test</u>	: SAR
<u>Manufacturer</u>	: LIPMAN USA	<u>Frequency (MHz)</u>	: 901
<u>Model Number</u>	: 8000	<u>Nominal Output Power (W)</u>	: 2
<u>Serial Number</u>	:	<u>Antenna Type</u>	: Patch
<u>FCC ID Number</u>	:	<u>Signal</u>	: 25%

<u>Phantom</u>	: Waist	<u>Dielectric Constant</u>	: 50.9
<u>Simulated Tissue</u>	: Muscle	<u>Conductivity</u>	: 1.40

<u>Probe</u>	: UT-ETR-0200-1(c)	<u>Antenna Position</u>	: Front
<u>Probe Offset (mm)</u>	: 2.250	<u>Measured Power (W)</u>	: 1.91
<u>Sensor Factor (mV)</u>	: 10.8	<u>(conducted)</u>	
<u>Conversion Factor</u>	: 0.880	<u>Cable Insertion Loss (dB)</u>	: 0
<u>Calibrated Date</u>	: 14/06/2001	<u>Compensated Power (W)</u>	: 1.910

Amplifier Setting :
Channel 1 : 0.0056 Channel 2 : 0.0053 Channel 3 : 0.0066

Location of Maximum Field :

X = -15 Y = 0

Measured Values (mV) :

0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	

<u>Peak Voltage (mV)</u>	: 0.000	<u>1 Cm Voltage (mV)</u>	: 0.000	<u>SAR (W/Kg)</u>	: 0.000
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