



SAR Evaluation Report

**IN ACCORDANCE WITH THE REQUIREMENTS OF
FCC REPORT AND ORDER:
ET DOCKET 93-62, AND OET BULLETIN 65 SUPPLEMENT C**

FOR

Express MINI-PCI USB Wireless CDMA Modem Module

Model: MC5720

FCC ID: N7N-MC5720

REPORT NUMBER: 05U3674-2

ISSUE DATE: September 9, 2005

Prepared for

**SIERRA WIRELESS
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UNITED STATES**

Prepared by

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LAB CODE:200065-0

Revision History

Rev.	Issued date	Revisions	Revised By
A	August 31, 2005	Initial Issue	HS
B	September 9, 2005	Updated pages 27 and 28 to indicate the location of WLAN antenna	HS

CERTIFICATE OF COMPLIANCE (SAR EVALUATION)**DATES OF TEST:** August 29 - 30, 2005

APPLICANT: ADDRESS:	Sierra Wireless 2290 Cosmos Ct. Carlsbad CA 92009, United States
FCC ID: MODEL:	N7N-MC5720 MC5720
DEVICE CATEGORY: EXPOSURE CATEGORY:	Portable Device General Population/Uncontrolled Exposure

Express MINI-PCI USB Wireless CDMA Modem Module installed in host devices.

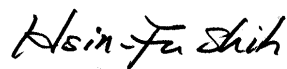
Application type: Test Sample is a:	Class II Permissive Change (Added alternative antenna) Identical prototype unit		
Host devices:	<u>Host Devices</u>	<u>LCD Cover</u>	<u>WLAN Module / FCC ID</u>
	Lenovo M-Note	Metal	Gwinette / PPD-AR5BxB6
	Lenovo M-Note	Plastic	Gwinette / PPD-AR5BxB6
<u>FCC Rule Parts</u>	<u>Frequency Range [MHz]</u>	<u>The Highest SAR Values [1g_mW/g]</u>	
22H	824.7 – 848.31	body: 0.082	
24E	1851.25 – 1908.75	body: 0.052	

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for General Population/Uncontrolled Exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC OET 65 Supplement C (Edition 01-01). And RSS-102 Issue 1 (Provisional) September 25, 1999.

The maximum 1g SAR level measured for all the tests performed did not exceed the limits for General Population/Uncontrolled Exposure (W/kg) Partial Body of 1.6 W/kg. Level defined in Supplement C (Edition 01-01) to OET Bulletin 65 (97-01).

Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by Compliance Certification Services and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by Compliance Certification Services will constitute fraud and shall nullify the document. No part of this report may be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any government agency.

Released For CCS By:



Hsin Fu Shih

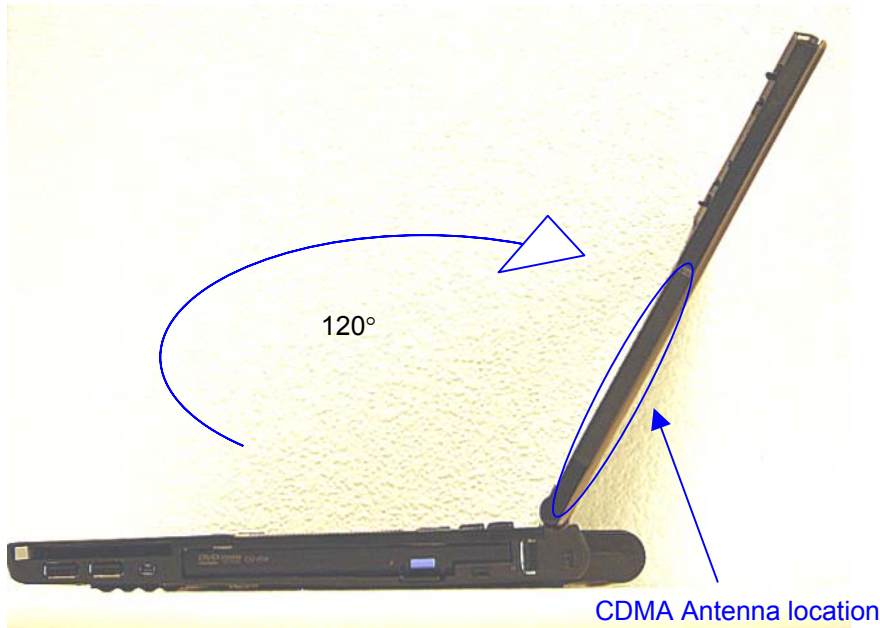
SENIOR ENGINEER

COMPLIANCE CERTIFICATION SERVICES

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1 EQUIPMENT UNDER TEST (EUT) DESCRIPTION

Express MINI-PCI USB Wireless CDMA Modem Module installed in host devices			
Host devices:	<u>Host Devices</u>	<u>LCD Cover</u>	<u>WLAN Module / FCC ID</u>
	Lenovo M-Note	Metal	Gwinette / PPD-AR5BXB6
	Lenovo M-Note	Plastic	Gwinette / PPD-AR5BXB6
Normal operation:	Lap-held position		
			
Power supply:	Power supplied through the laptop computer (host device)		

2 FACILITIES AND ACCREDITATION

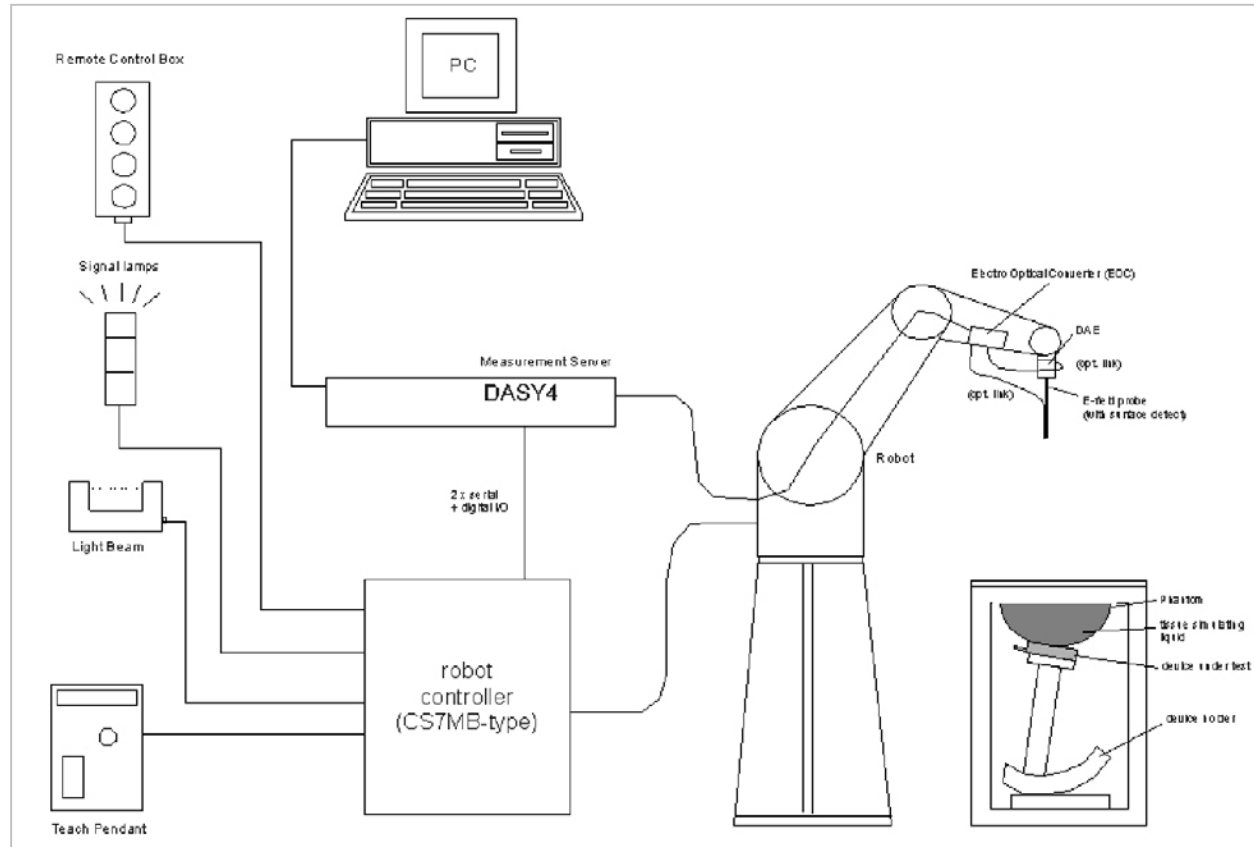
The test sites and measurement facilities used to collect data are located at 561F Monterey Road, Morgan Hill, California, USA. The sites are constructed in conformance with the requirements of ANSI C63.4, ANSI C63.7 and CISPR Publication 22. All receiving equipment conforms to CISPR Publication 16-1, "Radio Interference Measuring Apparatus and Measurement Methods."



CCS is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at <http://www.ccsemc.com>.

No part of this report may be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any government agency.

3 SYSTEM DESCRIPTION



The DASY4 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stäubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 2000 or Windows XP.
- DASY4 software.
- Remote controls with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validate the proper functioning of the system.

4 SYSTEM COMPONENT

4.1 DASY4 MEASUREMENT SERVER



The DASY4 measurement server is based on a PC/104 CPU board with a 166MHz low-power Pentium, 32MB chip disk and 64MB RAM. The necessary circuits for communication with either the DAE3 electronic box as well as the 16-bit AD-converter system for optical detection and digital I/O interface are contained on the DASY4 I/O-board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. The PC-operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with two expansion slots which are reserved for future applications. Please note that the expansion slots do not have a standardized pinout and therefore only the expansion cards provided by SPEAG can be inserted. Expansion cards from any other supplier could seriously damage the measurement server. Calibration: No calibration required.

4.2 DATA ACQUISITION ELECTRONICS (DAE)

The data acquisition electronics (DAE3) consists of 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 measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection. The input impedance of the DAE3 box is 200M Ω m; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



4.3 EX3DV3 ISOTROPIC E-FIELD PROBE FOR DOSIMETRIC MEASUREMENTS

Construction: Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

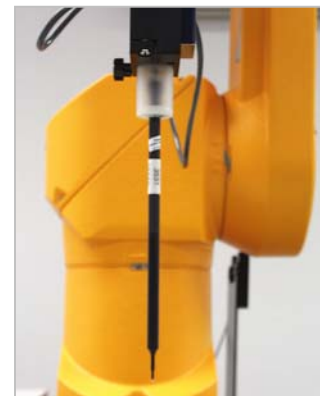
Frequency: 10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)

Directivity: ± 0.3 dB in HSL (rotation around probe axis);
 ± 0.5 dB in tissue material (rotation normal to probe axis)

Dynamic Range: 10 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)

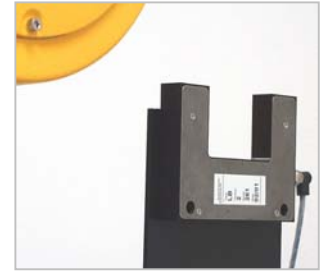
Dimensions: Overall length: 330 mm (Tip: 20 mm)
Tip diameter: 2.5 mm (Body: 12 mm)
Typical distance from probe tip to dipole centers: 1 mm

Application: High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.



4.4 LIGHT BEAM UNIT

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, so that the robot coordinates are valid for the probe tip. The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.



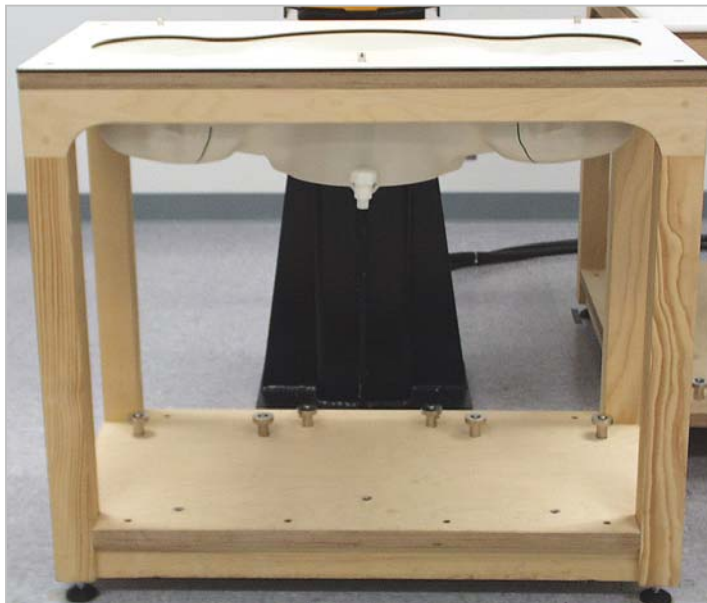
4.5 SAM PHANTOM (V4.0)

Construction: The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528-200X, CENELEC 50361 and IEC 62209. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points with the robot.

Shell Thickness: 2 ± 0.2 mm

Filling Volume: Approx. 25 liters

Dimensions: Height: 810mm; Length: 1000mm; Width: 500mm



4.6 DEVICE HOLDER FOR SAM TWIN PHANTOM

Construction: In combination with the Twin SAM Phantom V4.0 or Twin SAM, the Mounting Device (made from POM) enables the rotation of the mounted transmitter in spherical coordinates, whereby the rotation point is the ear opening. The devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



4.7 SYSTEM VALIDATION KITS

Construction: Symmetrical dipole with 1/4 balun Enables measurement of feedpoint impedance with NWA Matched for use near flat phantoms filled with brain simulating solutions Includes distance holder and tripod adaptor.

Frequency: 450, 900, 1800, 2450, 5800 MHz

Return loss: > 20 dB at specified validation position

Power capability: > 100 W (f < 1GHz); > 40 W (f > 1GHz)

Dimensions: 450V2: dipole length: 270 mm; overall height: 330 mm
 D900V2: dipole length: 149 mm; overall height: 330 mm
 D1800V2: dipole length: 72 mm; overall height: 300 mm
 D835V2: dipole length: 161; overall height: 330
 D1900V2: dipole length: 68; overall height: 300
 D2450V2: dipole length: 51.5 mm; overall height: 300 mm D5GHzV2: dipole length: 25.5 mm; overall height: 290 mm

4.8 COMPOSITION OF INGREDIENTS FOR TISSUE SIMULATING LIQUID

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (S/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

Salt: 99+% Pure Sodium Chloride

Sugar: 98+% Pure Sucrose

Water: De-ionized, 16 MΩ+ resistivity

HEC: Hydroxyethyl Cellulose

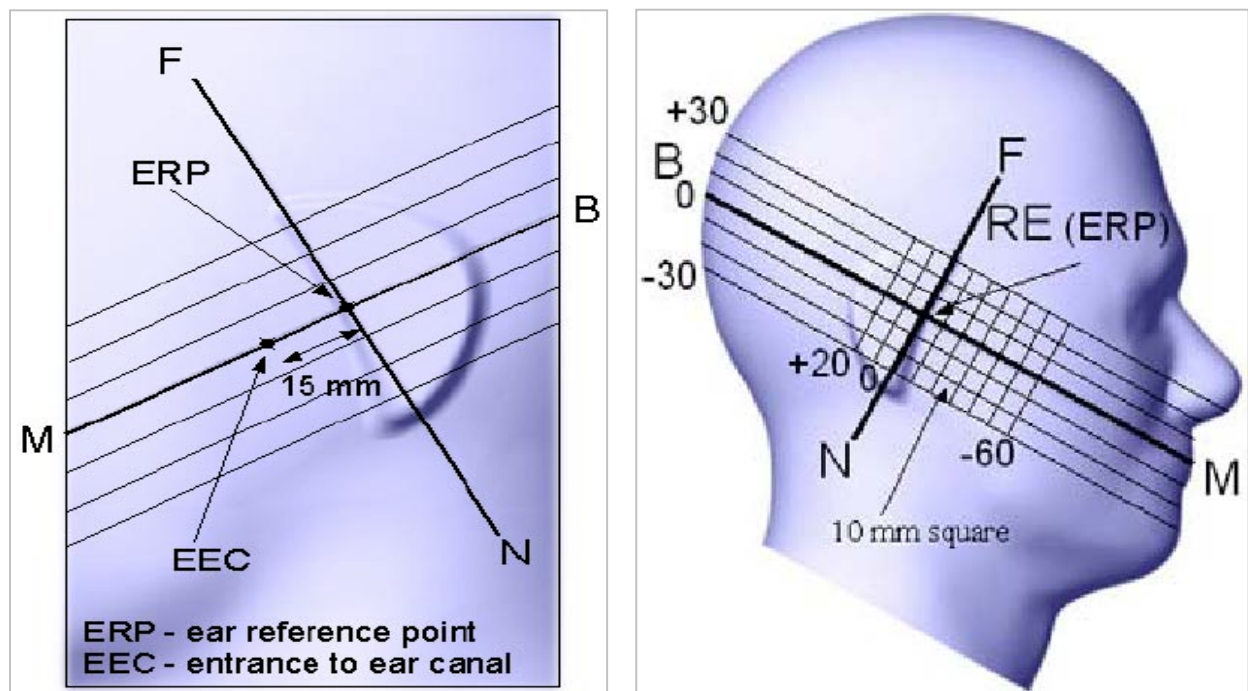
DGBE: 99+% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy)ethanol]

Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1, 3, 3-tetramethylbutyl)phenyl]ether

5 TEST POSITIONS FOR DEVICES OPERATING NEXT TO A PERSON'S EAR

This category includes most wireless handsets with fixed, retractable or internal antennas located toward the top half of the device, with or without a foldout, sliding or similar keypad cover. The handset should have its earpiece located within the upper ¼ of the device, either along the centerline or off-centered, as perceived by its users. This type of handset should be positioned in a normal operating position with the "test device reference point" located along the "vertical centerline" on the front of the device aligned to the "ear reference point". The "test device reference point" should be located at the same level as the center of the earpiece region. The "vertical centerline" should bisect the front surface of the handset at its top and bottom edges. A "ear reference point" is located on the outer surface of the head phantom on each ear spacer. It is located 1.5 cm above the center of the ear canal entrance in the "phantom reference plane" defined by the three lines joining the center of each "ear reference point" (left and right) and the tip of the mouth.

A handset should be initially positioned with the earpiece region pressed against the ear spacer of a head phantom. For the SCC-34/SC-2 head phantom, the device should be positioned parallel to the "N-F" line defined along the base of the ear spacer that contains the "ear reference point". For interim head phantoms, the device should be positioned parallel to the cheek for maximum RF energy coupling. 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". This is called the "initial ear position". While maintaining these three alignments, the body of the handset is gradually adjusted to each of the following positions for evaluating SAR:



5.1 CHEEK/TOUCH POSITION

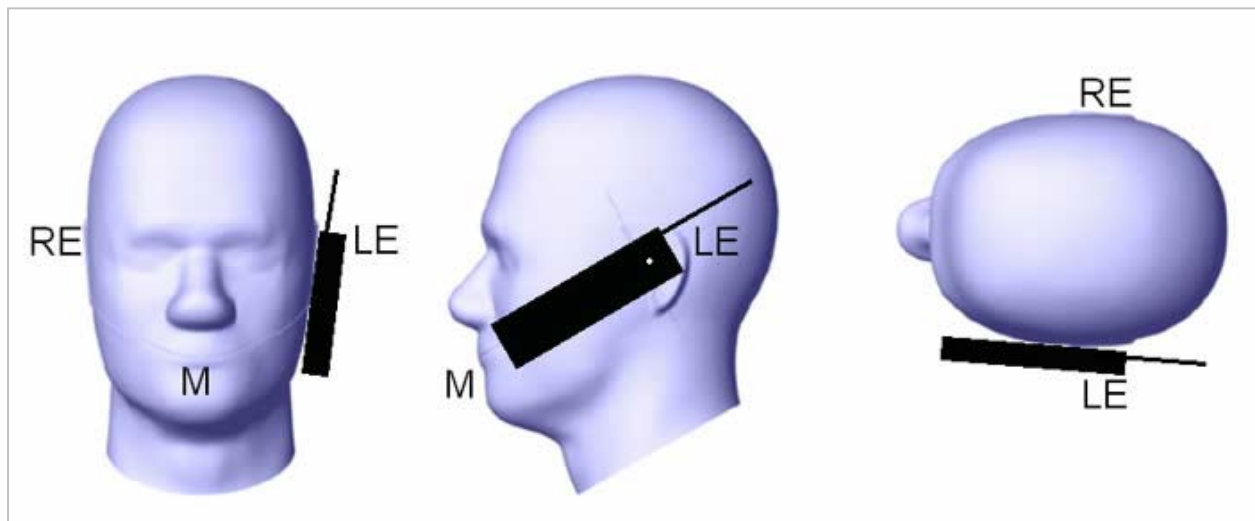
The device is brought toward the mouth of the head phantom by pivoting against the “ear reference point” or along the “N-F” line for the SCC-34/SC-2 head phantom.

This test position is established:

- i. When any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom.
- ii. (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.

For existing head phantoms – when the handset loses contact with the phantom at the pivoting point, rotation should continue until the device touches the cheek of the phantom or breaks its last contact from the ear spacer.

Cheek / Touch Position



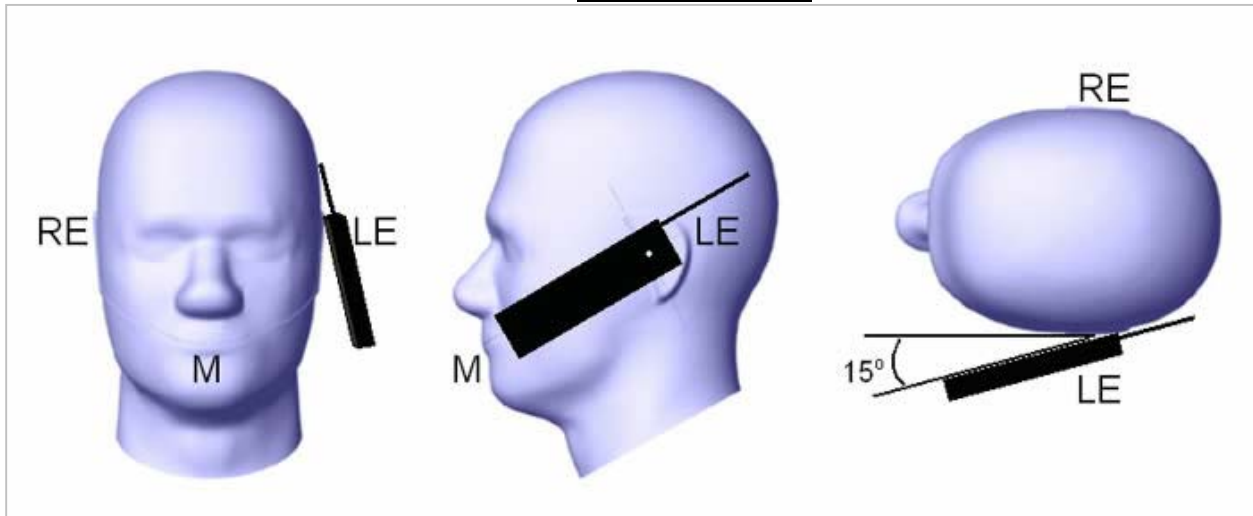
5.2 EAR/TILT POSITION

With the handset aligned in the “Cheek/Touch Position”:

- i. If the earpiece of the handset is not in full contact with the phantom’s ear spacer (in the “Cheek/Touch position”) and the peak SAR location for the “Cheek/Touch” position is located at the ear spacer region or corresponds to the earpiece region of the handset, the device should be returned to the “initial ear position” by rotating it away from the mouth until the earpiece is in full contact with the ear spacer.
- ii. (otherwise) The handset should be moved (translated) away from the cheek perpendicular to the line passes through both “ear reference points” (note: one of these ear reference points may not physically exist on a split head model) for approximate 2-3 cm. While it is in this position, the device handset is tilted away from the mouth with respect to the “test device reference point” until the inside angle between the vertical centerline on the front surface of the phone and the horizontal line passing through the ear reference point is by 15° . After the tilt, it is then moved (translated) 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 should be repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously. This test position may require a device holder or positioner to achieve the translation and tilting with acceptable positioning repeatability.

If a device is also designed to transmit with its keypad cover closed for operating in the head position, such positions should also be considered in the SAR evaluation. The device should be tested on the left and right side of the head phantom in the “Cheek/Touch” and “Ear/Tilt” positions. When applicable, each configuration should be tested with the antenna in its fully extended and fully retracted positions. These test configurations should be tested at the high, middle and low frequency channels of each operating mode; for example, AMPS, CDMA, and TDMA. If the SAR measured at the middle channel for each test configuration (left, right, Cheek/Touch, Tile/Ear, extended and retracted) is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

Ear/Tilt 15° Position



6 TEST POSITIONS FOR BODY-WORN AND OTHER SIMILAR CONFIGURATIONS

☐ With the belt-clips or holsters

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations. Devices with a headset output should be tested with a headset connected to the device. For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do.

☐ When multiple accessories

When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., the same metallic belt-clip used with different holsters with no other metallic components), only the accessory that dictates the closest spacing to the body must be tested.

☐ Without the belt-clips or holsters

Body-worn accessories may not always be supplied or available as options for some devices that are intended to be authorized for body-worn use. A separation distance of 1.5 cm between the back of the device and a flat phantom is recommended for testing body-worn SAR compliance under such circumstances. Other separation distances may be used, but they should not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

☐ Transmitter that is designed to operate in front of a person's face (face-held)

Transmitters that are designed to operate in front of a person's face, in push-to-talk configurations, should be tested for SAR compliance with the front of the device positioned at 2.5 cm from a flat phantom. Frontal face-phantoms are typically not recommended because of the potential of higher E-field probe boundary-effects errors in the non-smooth regions of these face phantoms, such as the nose, lips and eyes etc. For devices that are carried next to the body, such as shoulder, waist or chest-worn transmitters, SAR compliance should be tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in normal use configurations.

☐ With neck-strap or lanyard

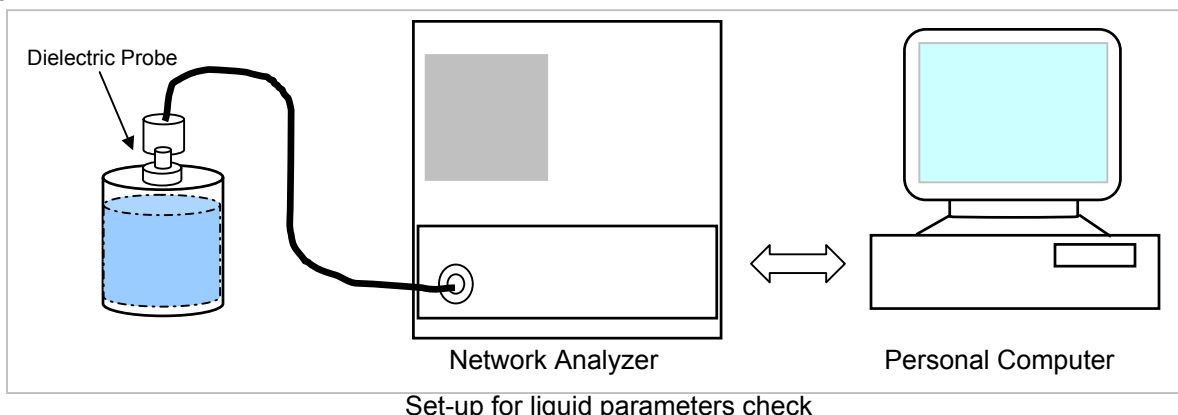
SAR data is requested for cellphones designed to be used with a headset while worn next to the body using a neck-strap or lanyard; device should be tested with front and back sides in contact with a flat phantom

☒ Lap-held

SAR is tested for a lap-held position with the bottom of the computer in direct contact against a flat phantom.

7 SIMULATING LIQUID PARAMETERS CHECK

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine if the dielectric parameters are within the tolerances of the specified target values. The relative permittivity and conductivity of the tissue material should be within $\pm 5\%$ of the values given in the table below.



Reference Values of Tissue Dielectric Parameters for Head and Body Phantom

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in IEEE Standard 1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations and extrapolated according to the head parameters specified in IEEE Standard 1528.

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

(ϵ_r = relative permittivity, σ = conductivity and $\rho = 1000 \text{ kg/m}^3$)

7.1 SIMULATING LIQUID PARAMETER CHECK RESULT

Simulating Liquid Parameter Check Result @ Head 835 MHz

Room Ambient Temperature = 23.0°C; Relative humidity = 45%

Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)	e'	Relative Permittivity (e'')				
835	22	15		Relative Permittivity (e'')	41.5	42.2661	1.85	± 5
			20.2836	Conductivity (σ)	0.90	0.9422	4.69	± 5

Liquid Check

Ambient temperature: 23.0 deg C; Liquid temperature: 22.0 deg C

August 29, 2005 11:48 AM

Frequency	e'	e''
750000000.	43.2206	20.6720
755000000.	43.1378	20.6538
760000000.	43.1178	20.6080
765000000.	43.0608	20.5497
770000000.	42.9576	20.5271
775000000.	42.8720	20.5229
780000000.	42.8060	20.5026
785000000.	42.7458	20.4588
790000000.	42.6613	20.4444
795000000.	42.6089	20.4217
800000000.	42.5677	20.3963
805000000.	42.5070	20.3765
810000000.	42.4767	20.3650
815000000.	42.4550	20.3621
820000000.	42.4156	20.3318
825000000.	42.3415	20.3276
830000000.	42.2756	20.3108
835000000.	42.2661	20.2836
840000000.	42.1950	20.2794
845000000.	42.0946	20.2419
850000000.	42.0824	20.2529
855000000.	42.0294	20.1923
860000000.	41.9458	20.1310
865000000.	41.8582	20.1231
870000000.	41.7962	20.1287
875000000.	41.7402	20.0817
880000000.	41.6569	20.0432
885000000.	41.6165	20.0433
890000000.	41.5565	20.0091
895000000.	41.5057	20.0026
900000000.	41.4662	19.9979

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 e'' = 2 \pi f \epsilon_0 e''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

Simulating Liquid Parameter Check Result @ Muscle 835 MHz

Room Ambient Temperature = 23.0 °C; Relative humidity = 45%

Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)	e'	Relative Permittivity (e'')				
835	22	15			55.2	55.1629	-0.07	± 5
			21.2370	Conductivity (σ):	0.97	0.9865	1.70	± 5

Liquid Check

Ambient temperature: 23.0 deg C; Liquid temperature: 22.0 deg C

August 29, 2005 12:19 PM

Frequency	e'	e''
750000000.	55.8749	21.6741
755000000.	55.8446	21.6525
760000000.	55.8006	21.5881
765000000.	55.7258	21.5350
770000000.	55.6707	21.5346
775000000.	55.6272	21.5302
780000000.	55.5459	21.4809
785000000.	55.5284	21.4444
790000000.	55.4356	21.3888
795000000.	55.4104	21.3903
800000000.	55.3752	21.3609
805000000.	55.3620	21.3580
810000000.	55.3549	21.3072
815000000.	55.3195	21.3009
820000000.	55.3079	21.2802
825000000.	55.2497	21.2823
830000000.	55.2091	21.2835
835000000.	55.1629	21.2370
840000000.	55.1225	21.2328
845000000.	55.0530	21.2067
850000000.	55.0360	21.1720
855000000.	54.9708	21.1233
860000000.	54.9081	21.1066
865000000.	54.8523	21.0769
870000000.	54.8083	21.0752
875000000.	54.7323	21.0432
880000000.	54.6831	21.0225
885000000.	54.6497	20.9853
890000000.	54.5769	20.9534
895000000.	54.5768	20.9562
900000000.	54.5385	20.9532

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 e'' = 2 \pi f \epsilon_0 e''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

Simulating Liquid Dielectric Parameters Check Result @ Head 1900 MHz

Room Ambient Temperature = 23°C; Relative humidity = 45%

Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)	ε"	Relative Permittivity (ε')				
1900	22	15	ε"	Relative Permittivity (ε')	40.0	40.3017	0.75	± 5
			13.5416	Conductivity (σ)	1.40	1.4313	2.24	± 5

Liquid Check

Ambient temperature: 23.0 deg C; Liquid temperature: 22.0 deg C

August 30, 2005 09:47 AM

Frequency	ε'	ε"
1710000000.	41.1679	13.0620
1720000000.	41.0857	13.1083
1730000000.	41.0463	13.1447
1740000000.	41.0015	13.1595
1750000000.	40.9537	13.1979
1760000000.	40.9036	13.2503
1770000000.	40.8541	13.2961
1780000000.	40.7973	13.3124
1790000000.	40.7431	13.3306
1800000000.	40.7206	13.3383
1810000000.	40.6697	13.3578
1820000000.	40.6187	13.3654
1830000000.	40.5592	13.3816
1840000000.	40.5226	13.4080
1850000000.	40.4823	13.4550
1860000000.	40.4194	13.4741
1870000000.	40.3626	13.4957
1880000000.	40.3365	13.4976
1890000000.	40.3021	13.5082
1900000000.	40.3017	13.5416
1910000000.	40.2741	13.6049

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 \epsilon'' = 2 \pi f \epsilon_0 \epsilon''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

Simulating Liquid Dielectric Parameters Check Result @ Muscle 1900 MHz

Room Ambient Temperature = 23°C; Relative humidity = 45%

Measured by: Sunny Shih

Simulating Liquid			Parameters		Target	Measured	Deviation (%)	Limit (%)
f (MHz)	Temp. (°C)	Depth (cm)	ε"	Relative Permittivity (ε _r):	53.3	52.4484	-1.60	± 5
1900	22	15	14.6133	Conductivity (σ):	1.52	1.54462	1.62	± 5

Liquid Check

Ambient temperature: 23.0 deg C; Liquid temperature: 22.0 deg C

August 30, 2005 09:38 AM

Frequency	ε'	ε"
1710000000.	53.1637	14.1440
1720000000.	53.1145	14.1888
1730000000.	53.0543	14.2354
1740000000.	53.0310	14.2484
1750000000.	52.9919	14.2929
1760000000.	52.9535	14.3443
1770000000.	52.9004	14.3754
1780000000.	52.8387	14.4069
1790000000.	52.8051	14.4259
1800000000.	52.7683	14.4262
1810000000.	52.7386	14.4497
1820000000.	52.6870	14.4416
1830000000.	52.6530	14.4767
1840000000.	52.6197	14.4897
1850000000.	52.5744	14.5280
1860000000.	52.5115	14.5606
1870000000.	52.4685	14.5725
1880000000.	52.4457	14.5848
1890000000.	52.4285	14.5814
1900000000.	52.4484	14.6133
1910000000.	52.4163	14.6851

The conductivity (σ) can be given as:

$$\sigma = \omega \epsilon_0 \epsilon'' = 2 \pi f \epsilon_0 \epsilon''$$

where $f = \text{target } f * 10^6$

$$\epsilon_0 = 8.854 * 10^{-12}$$

8 SYSTEM PERFORMANCE CHECK

The system performance check is performed prior to any usage of the system in order to guarantee reproducible results. The system performance check verifies that the system operates within its specifications of $\pm 10\%$.

System Performance Check Measurement Conditions

- The measurements were performed in the flat section of the SAM twin phantom filled with Head simulating liquid of the following parameters.
- The DASY4 system with an Isotropic E-Field Probe EX3DV3-SN: 3552 was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
- Special 5 x 5 x 7 fine cube was chosen for cube integration ($dx=dy=7.5\text{mm}$; $dz=5\text{mm}$).
- Distance between probe sensors and phantom surface was set to 2.5 (below 3 G) mm.
- The dipole input power (forward power) was $250\text{ mW} \pm 3\%$.
- The results are normalized to 1 W input power.

Reference SAR Values

IEEE Standard 1528 Recommended Reference Value

Frequency (MHz)	1 g SAR	10 g SAR	Local SAR at surface (Above feed point)	Local SAR at surface (y=2cm offset from feed point)
300	3.0	2.0	4.4	2.1
450	4.9	3.3	7.2	3.2
835	9.5	6.2	14.1	4.9
900	10.8	6.9	16.4	5.4
1450	29.0	16.0	50.2	6.5
1800	38.1	19.8	69.5	6.8
1900	39.7	20.5	72.1	6.6
2450	52.4	24.0	104.2	7.7
3000	63.8	25.7	140.2	9.5

8.1 SYSTEM PERFORMANCE CHECK RESULTS

@ System Validation Dipole: D835V2 SN:4d002

Date: August 29, 2005

Ambient Temperature = 23°C; Relative humidity = 45%

Measured by: Sunny Shih

Head Simulating Liquid			Mrasured		Target_ _{1g}	Deviation[%]	Lim it [%]
f (MHz)	Temp. [°C]	Depth [cm]	1g	Normalized to 1 W			
835	22	15	2.51	10.04	9.5	5.68	± 10

@ System Validation Dipole: D1900V2 SN:5d043

Date: August 30, 2005

Ambient Temperature = 23°C; Relative humidity = 45

Measured by: Sunny Shih

Head Simulating Liquid			Mrasured		Target_ _{1g}	Deviation[%]	Lim it [%]
f (MHz)	Temp. [°C]	Depth [cm]	1g	Normalized to 1 W			
1900	22	15	9.97	39.88	39.7	0.45	± 10

9 SAR MEASUREMENT PROCEDURE

A summary of the procedure follows:

- a) A measurement of the SAR value at a fixed location is used as a reference value for assessing the power drop of the EUT. The SAR at this point is measured at the start of the test, and then again at the end of the test.
- b) The SAR distribution at the exposed flat section of the flat phantom is measured at a distance of 2.5 mm from the inner surface of the shell. The area covers the entire dimension of the EUT and the horizontal grid spacing is 15 mm x 15 mm. Based on this data, the area of the maximum absorption is determined by Spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.
- c) Around this point, a volume of $X=Y=Z=30$ mm is assessed by measuring $5 \times 5 \times 7$ mm points. On the basis of this data set, the spatial peak SAR value is evaluated with the following procedure:
 - (i) The data at the surface are extrapolated, since the centre of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation is based on a least square algorithm. A polynomial of the fourth order is calculated through the points in z-axes. This polynomial is then used to evaluate the points between the surface and the probe tip.
 - (ii) The maximum interpolated value is searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g and 10 g) are computed using the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one-dimensional splines with the "Not a knot"- condition (in x, y and z-direction). The volume is integrated with the trapezoidal – algorithm. One thousand points ($10 \times 10 \times 10$) are interpolated to calculate the averages.
 - (iii) All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.
 - (iv) The SAR value at the same location as in Step (a) is again measured to evaluate the actual power drift.

DASY4 SAR MEASUREMENT PROCEDURE

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The Minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the Distance of sensor calibration points to probe tip as defined in the probe properties (for example, 1.2 mm for an EX3DV3 probe type).

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY4 software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528, EN 50361 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures 5 x 5 x 7 mm points within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

Step 5: Z-Scan

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation, the extrapolated distance should not be larger than the step size in Z-direction.

10 PROCEDURES USED TO ESTABLISH TEST SIGNAL

The manufacturer supplied a special driving program (Hyper Terminal) by using the following commands to turn the transmitter on and change the channels and bands:

at!oem=176

OK

at!diag

OK

at!tx=1

OK

at!chan=XXXX,1 or 0

OK

at!allup=1

OK

"at!chan=" changes both the band and the channels. Channels the first # then the comma followed by the band 0= cellular and 1= PCS.

Conducted powers were measured prior to SAR measurement.

CDMA Cell Band:		
		Conducted Power
Ch	f (MHz)	Avg Power
1013	824.70	26.10
384	836.52	25.88
777	848.31	25.40
CDMA PCS Bnad:		
		Conducted Power
Ch	f (MHz)	Avg Power
25	1851.25	26.02
600	1880.00	26.31
1175	1908.75	25.80

11 SAR TEST SUMMARY

11.1 Lenovo M-note Metal LCD cover with Gwinette WLAN module



CDMA Cell band

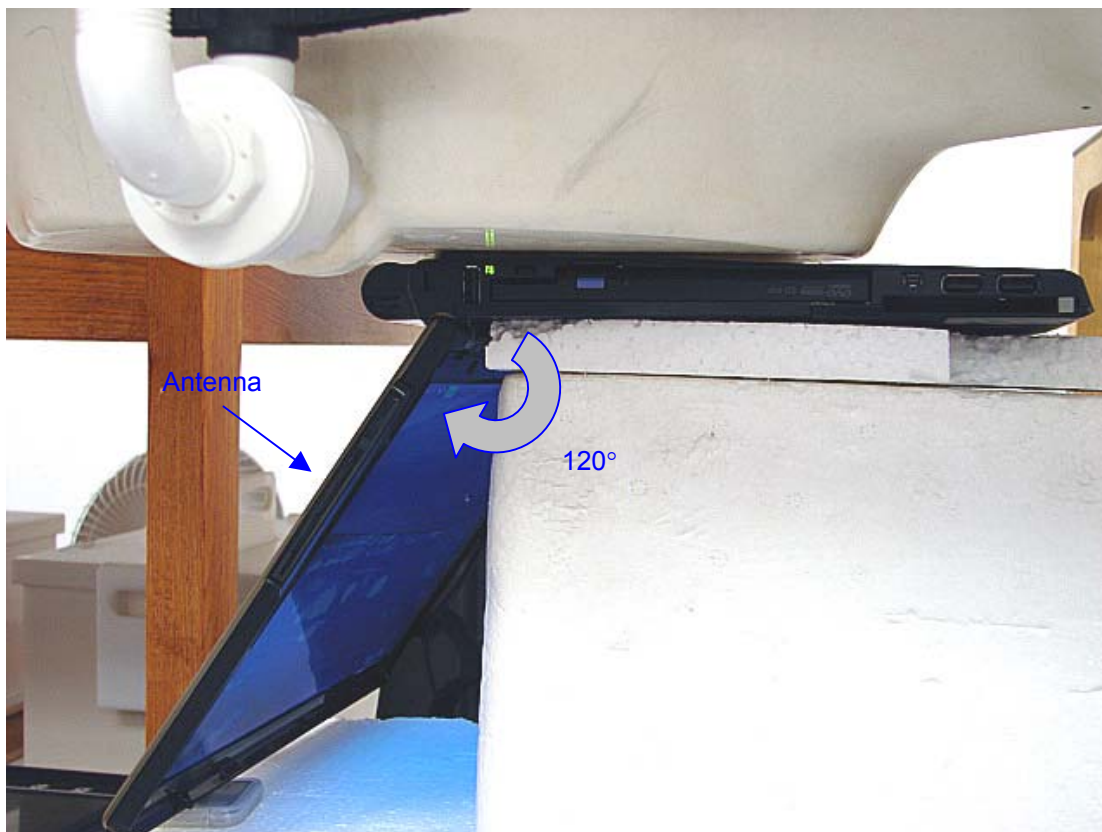
Channel	f (MHz)	WLAN on/off	Measured 1g (mW/g)	Power Drift (dBm)	Extrapolated 1g (mW/g)	Limit (mW/g)
1013	824.70	off	0.048	-0.010	0.048	1.6
384	836.52	off	0.063	-0.058	0.064	1.6
777	848.31	off	0.051	-0.141	0.053	1.6
1013	824.70	on				
384	836.52	on	0.062	-0.069	0.063	1.6
777	848.31	on				

CDMA PCS band

Channel	f (MHz)	WLAN on/off	Measured 1g (mW/g)	Power Drift (dBm)	Extrapolated 1g (mW/g)	Limit (mW/g)
25	1851.25	off				
600	1880.00	off	0.047	-0.010	0.047	1.6
1175	1908.75	off				
25	1851.25	on	0.050	-0.176	0.052	1.6
600	1880.00	on	0.047	-0.062	0.048	1.6
1175	1908.75	on	0.048	-0.133	0.049	1.6

Notes:

- 1) The exact method of extrapolation is $\text{measured SAR} \times 10^{(-\text{drift}/10)}$. The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.
- 2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.
- 3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

11.2 Lenovo M-note Plastic LCD cover with Gwinette WLAN module**CDMA Cell band**

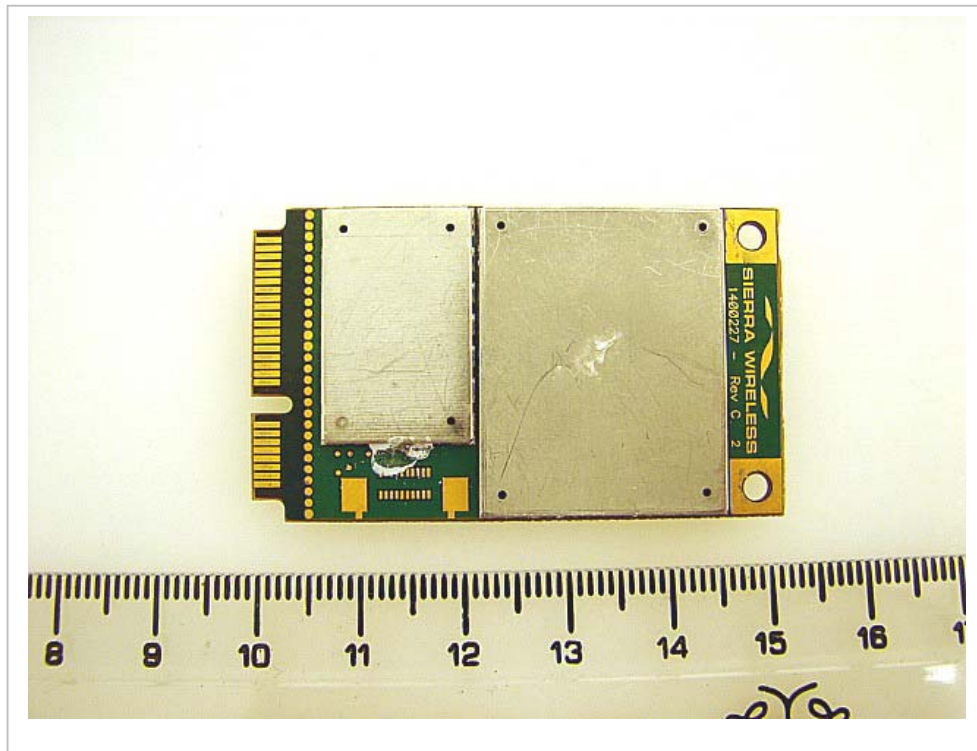
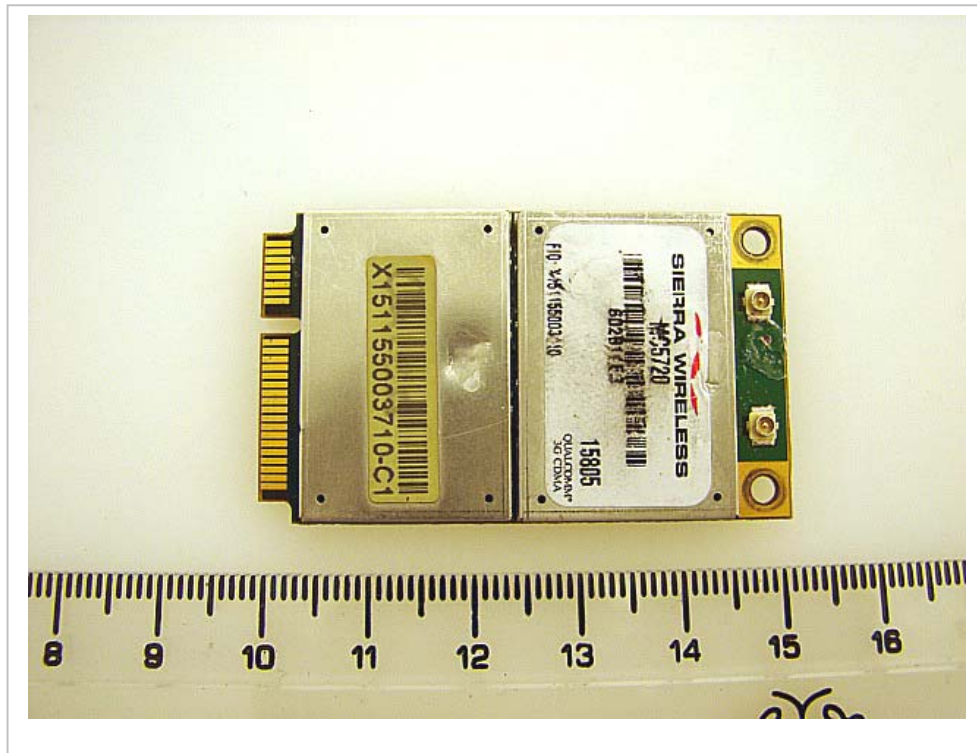
Channel	f (MHz)	WLAN on/off	Measured 1g (mW/g)	Power Drift (dBm)	Extrapolated 1g (mW/g)	Limit (mW/g)
1013	824.70	off				
384	836.52	off	0.079	-0.045	0.0794	1.6
777	848.31	off				
1013	824.70	on	0.063	-0.037	0.064	1.6
384	836.52	on	0.081	-0.053	0.082	1.6
777	848.31	on	0.066	-0.023	0.066	1.6

CDMA PCS band

Channel	f (MHz)	WLAN on/off	Measured 1g (mW/g)	Power Drift (dBm)	Extrapolated 1g (mW/g)	Limit (mW/g)
25	1851.25	off				
600	1880.00	off	0.038	-0.143	0.039	1.6
1175	1908.75	off				
25	1851.25	on				
600	1880.00	on	0.038	-0.138	0.039	1.6
1175	1908.75	on				

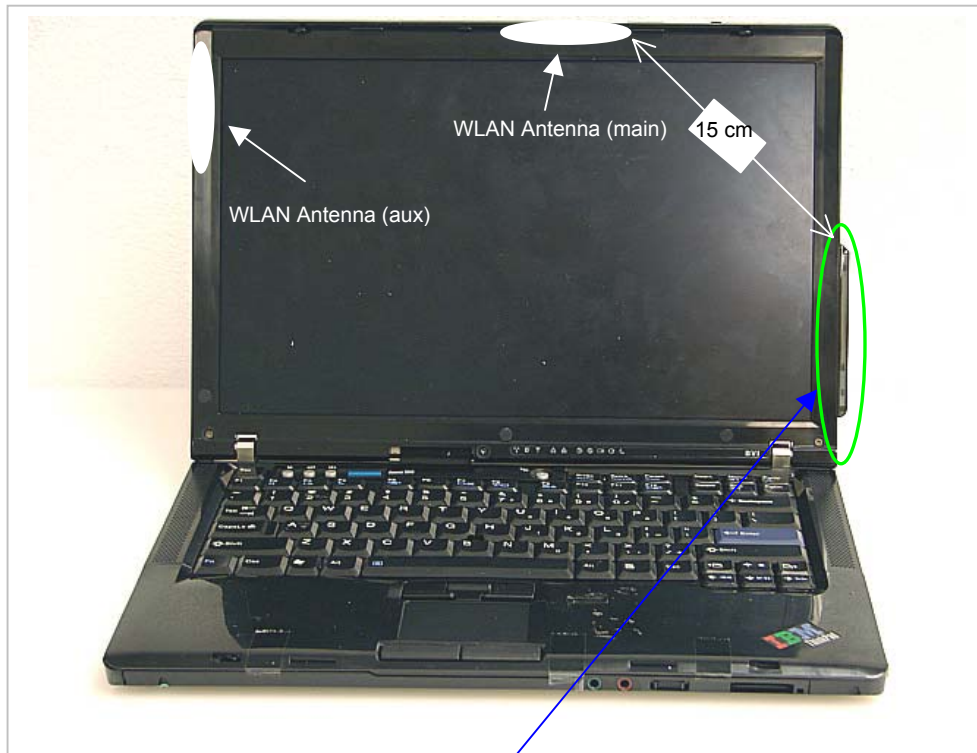
Notes:

- 1) The exact method of extrapolation is $\text{measured SAR} \times 10^{(-\text{drift}/10)}$. The SAR reported at the end of the measurement process by the DASY4 measurement system can be scaled up by the measured drift to determine the SAR at the beginning of the measurement process.
- 2) The SAR measured at the middle channel for this configuration is at least 3 dB lower than SAR limit, thus testing at low & high channel is optional.
- 3) Please see attachment for the detailed measurement data and plots showing the maximum SAR location of the EUT.

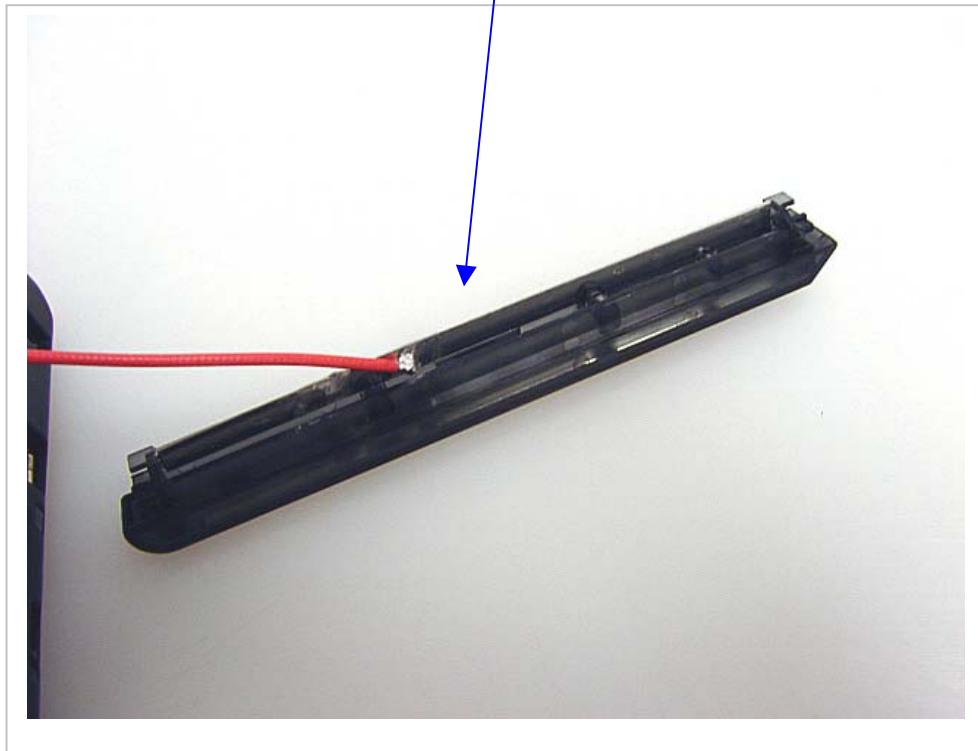
12 PHOTO**12.1 EUT**

12.2 HOST DEVICE

Front View
Levono M-note



WWAN Antenna (CDMA)



Rear View
Levono M-note – Metal LCD Cover



Levono M-note – Plastic LCD Cover



13 MEASUREMENT UNCERTAINTY

Uncertainty component	Tol. (±%)	Probe Dist.	Div.	Ci (1g)	Ci (10g)	Std. Unc.(±%)	
						Ui (1g)	Ui(10g)
Measurement System							
Probe Calibration	4.80	N	1	1	1	4.80	4.80
Axial Isotropy	4.70	R	1.732	0.707	0.707	1.92	1.92
Hemispherical Isotropy	9.60	R	1.732	0.707	0.707	3.92	3.92
Boundary Effects	1.00	R	1.732	1	1	0.58	0.58
Linearity	4.70	R	1.732	1	1	2.71	2.71
System Detection Limits	1.00	R	1.732	1	1	0.58	0.58
Readout Electronics	1.00	N	1	1	1	1.00	1.00
Response Time	0.80	R	1.732	1	1	0.46	0.46
Integration Time	2.60	R	1.732	1	1	1.50	1.50
RF Ambient Conditions - Noise	1.59	R	1.732	1	1	0.92	0.92
RF Ambient Conditions - Reflections	0.00	R	1.732	1	1	0.00	0.00
Probe Positioner Mechanical Tolerance	0.40	R	1.732	1	1	0.23	0.23
Probe Positioning With Respect to Phantom Shell	2.90	R	1.732	1	1	1.67	1.67
Extrapolation, interpolation, and integration algorithms for max. SAR evaluation	3.90	R	1.732	1	1	2.25	2.25
Test sample Related							
Test Sample Positioning	1.10	N	1	1	1	1.10	1.10
Device Holder Uncertainty	3.60	N	1	1	1	3.60	3.60
Power and SAR Drift Measurement	5.00	R	1.732	1	1	2.89	2.89
Phantom and Tissue Parameters							
Phantom Uncertainty	4.00	R	1.732	1	1	2.31	2.31
Liquid Conductivity - Target	5.00	R	1.732	0.64	0.43	1.85	1.24
Liquid Conductivity - Meas.	8.60	N	1	0.64	0.43	5.50	3.70
Liquid Permittivity - Target	5.00	R	1.732	0.6	0.49	1.73	1.41
Liquid Permittivity - Meas.	3.30	N	1	0.6	0.49	1.98	1.62
Combined Standard Uncertainty	RSS					11.44	10.49
Expanded Uncertainty (95% Confidence Interval)	K=2					22.87	20.98
Notesfor table							
1. Tol. - tolerance in influence quality							
2. N - Nomal							
3. R - Rectangular							
4. Div. - Divisor used to obtain standard uncertainty							
5. Ci - is te sensitivity coefficient							

14 EQUIPMENT LIST

<u>Name of Equipment</u>	<u>Manufacturer</u>	<u>Type/Model</u>	<u>Serial Number</u>	<u>Cal. Due date</u>
Robot - Six Axes	Stäubli	RX90BL	N/A	N/A
Robot Remote Control	Stäubli	CS7MB	3403-91535	N/A
DASY4 Measurement Server	SPEAG	SEUMS001BA	1041	N/A
Probe Alignment Unit	SPEAG	LB (V2)	261	N/A
S-Parameter Network Analyzer	Agilent	8753ES-6	US39173569	9/19/05
Electronic Probe kit	Hewlett Packard	85070C	N/A	N/A
E-Field Probe	SPEAG	EX3DV4	3552	3/19/06
Thermometer	ERTCO	639-1	8402	10/13/2005
Thermometer	ERTCO	639-1	8404	10/21/2005
Thermometer	ERTCO	637-1	8661	10/21/2005
SAM Phantom (SAM1)	SPEAG	TP-1185	QD000P40CA	N/A
SAM Phantom (SAM2)	SPEAG	TP-1015	N/A	N/A
Data Acquisition Electronics	SPEAG	DAE3 V1	500	2/7/06
System Validation Dipole	SPEAG	D2450V2	748	5/14/06
System Validation Dipole	SPEAG	D5GHzV2	1003	10/5/05
Signal General	R&H	SMP 04	DE34210	6/2/06
Power Meter	Giga-tronics	8651A	8651404	9/16/05
Power Sensor	Giga-tronics	80701A	1834588	9/16/05
Amplifier	Mini-Circuits	ZVE-8G	0360	N/A
Amplifier	Mini-Circuits	ZHL-42W	D072701-5	N/A
Radio Communication Tester	Rohde & Schwarz	CMU 200	838114/032	12/17/06
Wireless Communication Test Set	Agilent	E5515C	GB44051333	5/5/06
Simulating Liquid	CCS	H835 MHz	N/A	within 24 hrs of first test
Simulating Liquid	CCS	M835 MHz	N/A	within 24 hrs of first test
Simulating Liquid	CCS	H1900 MHz	N/A	within 24 hrs of first test
Simulating Liquid	CCS	M1900 MHz	N/A	within 24 hrs of first test

15 ATTACHMENT

No.	Contents	No. of page (s)
1	System Performance Check Plot	4
2-1	SAR Test Plot - Cell band	10
2-2	SAR Test Plot for PCS band	8
3	Certificate of E-filed Probe EX3DV4 SN 3552	10
4	Certificate of System Validation Dipole D835V2 SN 4d002	6
5	Certificate of System Validation Dipole D1900V2 SN 5d043	6

END OF REPORT