

**EXHIBIT 8****SAR Test Report****From****Kyocera Wireless Corp**

FCC ID:	OVFKWC-KE4X4
Model:	KE414 and KE424c

**STATEMENT OF COMPLIANCE**

Kyocera Wireless Corp declares under its sole responsibility that the product KE414 and KE424c (FCC ID: OVFKWC-KE4X4) to which this declaration relates, is in conformity with the appropriate General Population/Uncontrolled RF exposure standards, recommendations and guidelines. It also declares that the product was tested in accordance with the appropriate measurement standards, guidelines and recommended practices.

Any deviations from these standards, guidelines and recommended practices are noted: NONE.

Date of Test:	March 20-23, 2003
Test performed by:	Kyocera Wireless Corp 10300 Campus Point Drive CA 92121
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## 1 INTRODUCTION

This test report describes an environmental evaluation measurement of specific absorption rate (SAR) distribution in simulated human head tissues exposed to radio frequency (RF) radiation from a wireless portable device manufactured by Kyocera Wireless Corp. (KWC). These measurements were performed for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC). The testing was performed in accordance with FCC OET Bulletin 65 Supplement C (01/01) and IEEE P1528-200X Draft CD1.0.

## 2 EQUIPMENT UNDER TEST (EUT)

The phone is a single board Tri-mode 1XRTT product that integrates Assisted GPS capability to meet the emergency location requirements of the FCC's E911 Phase II mandate. The Tri-mode architecture is defined as 1900MHz (PCS CDMA), 800MHz (cellular CDMA and AMPS). Model KE414 and KE424C have the identical PCB, antenna and back housing. The differences between the two models are front housing cosmetic design and the LCD display.

The wireless device is described as follows:

FCC ID:	OVFKWC-KE4X4			
Product:	Tri-mode Dual-Band Analog/PCS Phone			
Trade Name:	Kyocera Wireless Corp			
Model Number:	KE414		KE424c	
EUT S/N:				
Type:	[X] Identical Prototype, Pre-production			
Device Category:	Portable			
RF Exposure Envionment:	General Population / Uncontrolled			
Antenna Type:	Fixed Stubby	Antenna Location:	Right, Rear	
Detachable Antenna:	Yes	Antenna Dimensions:	22.9mm (L) x 9.5mm (W)	
External Input:	Audio/Digital Data			
Quantity:	Quantity production is planned			
FCC Rule Parts:	§22H	§22H	§22.901(d)	§24H
Modes:	800 AMPS	800 CDMA	800 CDMA1X	1900 CDMA
Multiple Access Scheme:	FDMA	CDMA	CDMA	CDMA
Duty Cycle:	1:1	1:1	1:1	1:1
TX Frequency (MHz):	824 – 849	824 – 849	824 – 849	1850 - 1910
Emission Designators:	40K0F1D, 40K0F8W, 1M25F9W			
Max. Output Power (W)	0.326 ERP	0.338 ERP		0.427 EIRP

**Accessories:**
**KWC Battery Model: TXBAT10009 (3.7V, 700mA)**

There is only one battery option available to operate KWC-3225. All measurements were done with production batteries.

**KWC Dexter Leather Case Model: CA90-G2603-01**

**KWC Universal Belt Clip Model: 55-B1795-01**

**Battery Cover with Backpack Clip**


### 3 SAR TEST RESULT SUMMARY

This device has been tested for localised specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1 ~ 1992 and has been tested in accordance with the measurement procedures specified in IEEE P1528-200X Draft 6.5. Normal antenna operating positions were incorporated, with the device transmitting at frequencies consistent with normal usage of the device. The device has been shown to be capable of compliance for localised specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE std. C95.1-1992

#### 3.1 Maximum Results Found during SAR Evaluation

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

#### 3.2 Head Configuration

Model: KE414						
Mode	Ch/f(MHz)	Conducte d Power (dBm)	Device Position	Limit (mW/g)	Measured (mW/g)	Result
AMPS	383 (836.5)	25.10	Left Cheek	1.6	1.13	<b>PASSED</b>
CDMA-800	383(836.5)	25.01	Left Cheek	1.6	1.13	<b>PASSED</b>
CDMA-1900	25(1815.3)	23.10	Right Tilt	1.6	1.46	<b>PASSED</b>

Model: KE424C						
Mode	Ch/f(MHz)	Conducte d Power (dBm)	Device Position	Limit (mW/g)	Measured (mW/g)	Result
AMPS	383 (836.5)	25.13	Left Cheek	1.6	1.39	<b>PASSED</b>
CDMA-800	383(836.5)	25.03	Left Cheek	1.6	1.39	<b>PASSED</b>
CDMA-1900	25(1815.3)	23.02	Left Tilt	1.6	1.32	<b>PASSED</b>

### 3.3 Body Worn Configuration (with KWC body worn accessories)

Model: KE414						
Mode/	Ch/f(MHz)	Conducte d Power (dBm)	Configuration	Limit (mW/g)	Measured (mW/g)	Result
AMPS	383 (836.5)	25.00	Belt Clip	1.6	0.543	PASSED
CDMA-800	383 (836.5)	25.01	Belt Clip	1.6	0.575	PASSED
CDMA-1900	25(1815.3)	23.10	Belt Clip	1.6	0.505	PASSED

Model: KE424C						
Mode/	Ch/f(MHz)	Conducte d Power (dBm)	Configuration	Limit (mW/g)	Measured (mW/g)	Result
AMPS	383 (836.5)	25.13	22.5mm Air	1.6	0.686	PASSED
CDMA-800	383 (836.5)	25.03	22.5mm Air	1.6	0.726	PASSED
CDMA-1900	25(1815.3)	23.02	22.5mm Air	1.6	0.524	PASSED

### 3.4 Measurement Uncertainty

Combined Uncertainty (Assessment & Source)	± 10.32 %
Extended Uncertainty (k=2)	± 20.6 %

## 4 TEST CONDITIONS

### 4.1 Ambient Conditions

All tests were performed under the following environmental conditions:

<b>Ambient Temperature:</b>	22 $\pm$ 1 Degrees C
<b>Tissue simulating liquid temperature:</b>	22 $\pm$ 1 Degrees C
<b>Humidity:</b>	38 %
<b>Pressure:</b>	1015 mB

### 4.2 RF characteristics of the test site

All SAR measurements were performed inside a shielded room that provide isolation from external EM fields.

The E-field probes of the DASY 3 system are capable of detecting signals as low as 5 $\mu$ W/g in the liquid dielectric, and so external fields are minimised by the shielded room, leaving the phone as the dominate radiation source. 2 two-foot square ferrite panels are placed on the floor of the room beneath the phantom area of the DASY system to minimise reflected energy that would otherwise re-enter the phantom and combine constructively or destructively with the desired fields. These ferrite panels provide roughly 12 to 13 dB of attenuation in the frequency range of 900 MHz, and 7 to 8 dB of attenuation in the frequency range of 1.9 GHz.

### 4.3 Test Signal, Frequencies and Output Power

The device was controlled by using Kyocera Wireless Phone Support Toolkit, Test Code Controller.

In all operating bands, the measurements were performed on low, mid and high channels.

The phone was set to nominal maximum power level during all tests and at the beginning of the each test. Radiated power output was measured in KWC antenna range, fully an-echoic chamber from the same unit that was used in SAR testing.

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

### 4.4 Device Test Conditions

The EUT was tested with a fully charged standard battery as supplied with the handset. Conducted RF power measurements were performed before and after each SAR measurements to confirm the output power.

## 5 DESCRIPTION OF THE TEST EQUIPMENT

### 5.1 Dosimetric System

The measurements were performed with an automated near-field scanning system, DASY3, manufactured by Schmid & Partner Engineering AG (SPEAG) of Zurich, Switzerland. The system is comprised of high precision robot, robot controller, computer, near-field probe, probe alignment sensor and the SAM phantom containing brain or muscle equivalent material. The overall RSS uncertainty of the measurement system is  $\pm 10.32\%$  with an expanded uncertainty of  $\pm 20.5\%$  ( $K=2$ ). The measurement uncertainty budget is given in section 6. Below is a list of the calibrated equipment used for the measurements:

Test Equipment	Serial Number	Cal. Due Date
DASY3 DAE3 V1	494	02-18-04
E-field Probe ET3DV6	1712	09-06-03
Dipole Validation kit, D835V2	454	02-11-04
Dipole Validation kit, D1900V2	5D003	02-20-04

The calibration records of E-field probe are attached in Appendix C.

### 5.2 Additional equipment needed in validation

Test Equipment	Serial Number	Cal. Due Date
Signal Generator, HP E4421B	US38440324	04-14-03
Power meter, Giga-tronics 8541C	1835203	08-18-03
Power Sensor, Giga-tronics 80601A	1830963	01-16-04
Vector Network Analyzer, Agilent 8753C	3310A02636	09-30-03
Dielectric Probe Kit, HP 85070B	3033A03145	09-30-03
Thermometer	--	--

### 5.3 Tissue Stimulants

All dielectric parameters of tissue stimulants were measured within 24 hours of SAR measurements. The depth of the tissue stimulant in the ear reference point and flat reference point of the phantom were at least 15cm during all the tests.

The list of ingredients and the percent composition used for the Head and Muscle tissue simulates are listed in the table below:

Ingredient	835 MHz		1900 MHz	
	HEAD	MUSCLE	HEAD	MUSCLE
Water	51.07%	65.45%	54%	69.91%
Cellulose	0.23%	--	--	--
Glycol monobutyl	--	--	44.91%	29.96%
Sugar	47.31%	34.31%	--	--
Preventol	0.24%	0.1%	--	--
Salt	1.15%	0.62%	0.21%	0.13%

The ingredients above are adopted from Application Note: Recipes for Head/Muscle Tissue Simulating Liquid by SPEAG.

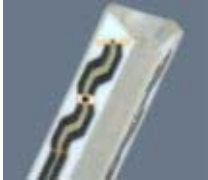


#### 5.4 Phantoms Description

SAM v4.0 phantom, manufactured by SPEAG, was used during the measurement. It has fiberglass shell integrated in a wooden table. The shape of the shell corresponds to the phantom defined in IEEE 1528-200X. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. Reference markings on the phantom allow the complete set-up of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

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

#### 5.5 Isotropic E-Field Probe

<b>Model</b>	<ul style="list-style-type: none"> <li>ET3DV6</li> </ul> 
<b>Construction</b>	<ul style="list-style-type: none"> <li>Symmetrical design with triangular core</li> <li>Built-in optical fiber for surface detection system</li> <li>Built-in shielding against static charges</li> <li>PEEK enclosure material (resistant to organic solvents, e.g., glycol)</li> </ul>
<b>Calibration</b>	<ul style="list-style-type: none"> <li>Calibration certificate in Appendix C</li> </ul>
<b>Frequency</b>	<ul style="list-style-type: none"> <li>10MHz to 3GHz (dosimetry); Linearity: <math>\pm 0.2</math>dB (30MHz to 3GHz)</li> </ul>
<b>Optical Surface</b>	<ul style="list-style-type: none"> <li><math>\pm 0.2</math>mm repeatability in air and clear liquid over diffuse reflecting</li> </ul>
<b>Detection</b>	<ul style="list-style-type: none"> <li>Surface</li> </ul>
<b>Directivity</b>	<ul style="list-style-type: none"> <li><math>\pm 0.2</math>dB in HSL (rotation around probe axis)</li> <li><math>\pm 0.4</math>dB in HSL (rotation normal to probe axis)</li> </ul>
<b>Dynamic Range</b>	<ul style="list-style-type: none"> <li>5 <math>\mu</math>W/g to &gt; 100 mW/g; Linearity: <math>\pm 0.2</math>dB</li> </ul>
<b>Dimensions</b>	<ul style="list-style-type: none"> <li>Overall length: 330mm</li> <li>Tip length: 16mm</li> <li>Body diameter: 12mm</li> <li>Tip diameter: 6.8mm</li> <li>Distance from probe tip to dipole centers: 2.7mm</li> </ul>
<b>Application</b>	<ul style="list-style-type: none"> <li>General dosimetry up to 3GHz</li> <li>Compliance tests of mobile phones</li> <li>Fast automatic scanning in arbitrary phantoms.</li> </ul>

## 6 SYSTEM VALIDATION

The probes are calibrated annually by the manufacturer. Dielectric parameters of the stimulating liquids are measured with an automated Hewlett Packard 85070B dielectric probe in conjunction with an Agilent 8753C network analyser.

The SAR measurements of the device were done within 24 hours of system accuracy verification, which was done using the dipole validation kit. Power level of 20dBm was supplied to a dipole antenna placed under the flat section of SAM phantom. The validation results are in the table below and printouts of the validation test are attached in Appendix A. All the measured parameters were within the specification.

Note since the validation reference in muscle liquid is not available, the system validation with head tissues was done for the device testing in muscle. Based on OET 65 Supplement C EAB Part 22/24 SAR review Reminder Sheet 01/2002, this is a valid test.

### For measurements on model KE414

Tissue	Freq. (MHz)	Description	Validation SAR (mW/g), 1g	Dielectric Parameters		Temp. (°C)	Test date	Comments Validation testing -
				$E_r$	$\sigma$ (S/m)			
Head	835	Measured	1.01	42.5	0.87	22±1	04-07-03	For device testing in head liquid
		Measured	1.01	42.0	0.87	22±1	04-08-03	For device testing in muscle
		SPEAG Reference	1.04	41.9	0.89	--	02-11-02	
		FCC Reference*	--	41.5	0.90	20-26	--	
	1900	Measured	4.43	39.9	1.44	22±1	04-08-03	for device testing in head liquid
		Measured	4.47	39.7	1.44	22±1	04-17-03	for device testing in head liquid
		Measured	4.5	39.6	1.45	22±1	04-09-03	for device testing in muscle
		SPEAG Reference	4.56	39.1	1.47	--	02-20-02	
		FCC Reference*	--	40.0	1.40	20-26	--	
Muscle	835	Measured	--	54.1	0.94	22±1	03-29-03	for device testing in muscle
		FCC Reference*	--	55.2	0.97	--	--	
	1900	Measured	--	53.2	1.48	22±1	03-30-03	for device testing in muscle
		FCC Reference*	--	53.3	1.52	20-26	--	

### For measurements on model KE424C

Tissue	Freq. (MHz)	Description	Validation SAR (mW/g), 1g	Dielectric Parameters		Temp. (°C)	Test date	Comments Validation testing -
				$E_r$	$\sigma$ (S/m)			
Head	835	Measured	1.02	42.1	0.88	22±1	03-28-03	For device testing in head liquid
			1.05	41.3	0.87	22±1	03-28-03	For device testing in head liquid
		Measured	1.02	41.2	0.86	22±1	03-29-03	For device testing in muscle
		SPEAG Reference	1.04	41.9	0.89	--	02-11-02	
		FCC Reference*	--	41.5	0.90	20-26	--	
	1900	Measured	4.41	39.1	1.42	22±1	03-30-03	for device testing in head liquid
		Measured	4.45	40.0	1.44	22±1	03-30-03	for device testing in muscle
		SPEAG Reference	4.56	39.1	1.47	--	02-20-02	
		FCC Reference*	--	40.0	1.40	20-26	--	
Muscle	835	Measured	--	54.4	0.93	22±1	03-29-03	for device testing in muscle
		FCC Reference*	--	55.2	0.97	--	--	
	1900	Measured	--	53.5	1.48	22±1	03-30-03	for device testing in muscle
		FCC Reference*	--	53.3	1.52	20-26	--	

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

## 7 DESCRIPTION OF THE TEST PROCEDURE

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

The device was position against phantom according to OET Bulletin 65 (97-01) Supplement C (01-01). Definitions of terms used in aligning the device to a head phantom are available in IEEE Draft Standard P1528-200X "Recommended Practice for Determining the Spatial-Peak Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques"

### 7.1 Test Positions

The device was placed in the holder. The bottom of the device aligns with the bottom of the holder clamp to provide a standard positioning and ensure enough free space for antenna.

Device holder was provided by SPEAG together with DASY3.

#### 7.1.1 Initial Ear Position

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

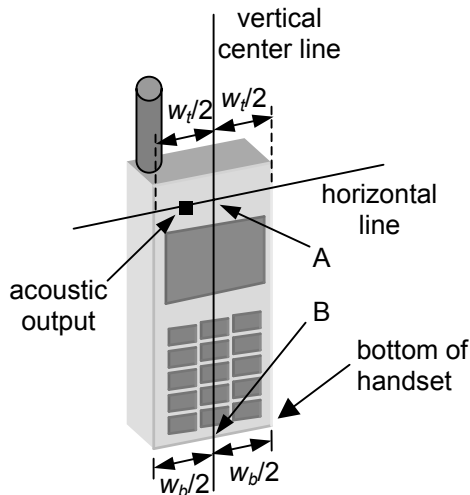


Figure 7-1 – Handset vertical and horizontal reference lines.

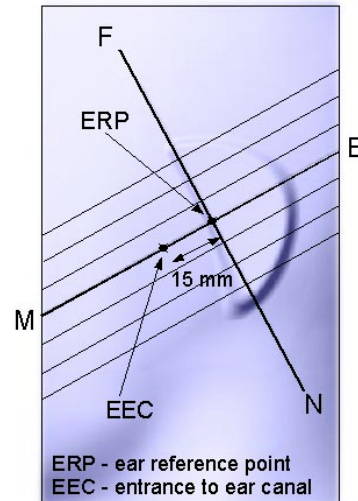


Figure 7-2 - Close up side view of phantom showing the ear region.

### 7.1.2 Cheek Position

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

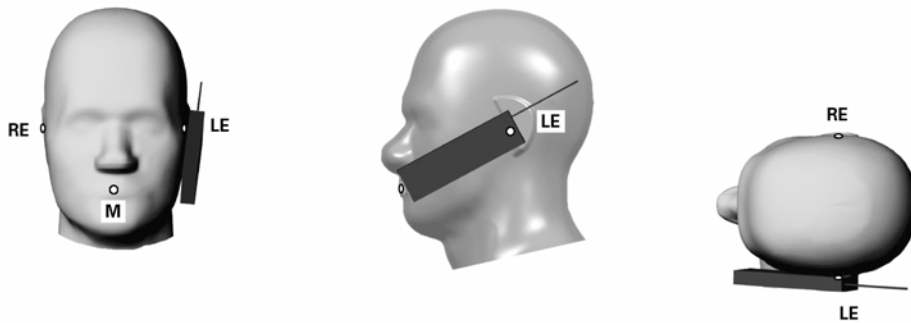


Figure 7.3 - Phone position 1, “cheek” or “touch” position.

### 7.1.3 Tilt Position

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

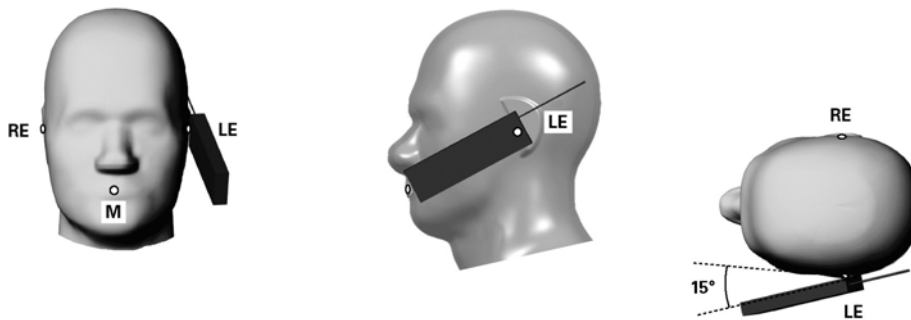


Figure 7.3 - Phone position 2, “tilted” position.

### 7.1.3 Body Worn Configuration

KWC body worn accessories were tested for the FCC RF exposure compliance. The phone was positioned into the carrying case and placed below the flat phantom. Hands-free headset was connected during measurements.

The SAR levels were also measured with 22.5mm air space for the hands-free application, which allow user can use other body-worn holster that contains no metal and provides at least 22.5mm separation from the closest point of the handset to the body.

## 7.2 Scan Procedures

First coarse scans are used for quick determination of the field distribution. Next a cube scan, 7x7x7 points; spacing between each point 5x5x5mm, is performed around the highest E-field value to determine the averaged SAR-distribution over 1g.

## 7.3 SAR Averaging Methods

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

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

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

## 8 MEASUREMENT UNCERTAINTY

Description of individual measurement uncertainty

Uncertainty Description	Uncert. Value (± %)	Probability distribution	Divisor	$C_i^1$ 1g	Stand. Uncert (1g) (±%)	$V_i^2$ or $V_{eff}$
<b>Measurement system</b>						
Probe calibration	4.4	N	1	1	4.4	∞
Axial isotropy of the probe	4.7	R	$\sqrt{3}$	$(1-C_p)^{1/2}$	1.9	∞
Sph. Isotropy of the probe	9.6	R	$\sqrt{3}$	$(C_p)^{1/2}$	3.9	∞
Spatial resolution	0.0	R	$\sqrt{3}$	1	0.0	∞
Boundary effects	5.5	R	$\sqrt{3}$	1	3.2	∞
Probe linearity	4.7	R	$\sqrt{3}$	1	2.7	∞
Detection limit	1.0	R	$\sqrt{3}$	1	0.6	∞
Readout electronics	1.0	N	1	1	1.0	∞
Response time	0.8	R	$\sqrt{3}$	1	0.5	∞
Integration time	1.4	R	$\sqrt{3}$	1	0.8	∞
RF ambient conditions	3.0	R	$\sqrt{3}$	1	1.7	∞
Mech. Constrains of robot	0.4	R	$\sqrt{3}$	1	0.2	∞
Probe positioning	2.9	R	$\sqrt{3}$	1	1.7	∞
Extrap. and integration	3.9	R	$\sqrt{3}$	1	2.3	∞
<b>Test Sample Related</b>						
Device positioning	3.0	N	$\sqrt{3}$	1	1.7	∞
Power drift	5.0	N	$\sqrt{3}$	1	2.9	∞
<b>Phantom and setup</b>						
Phantom uncertainty	4.0	R	1	1	2.3	∞
Liquid conductivity (target)	5.0	R	$\sqrt{3}$	0.6	1.7	∞
Liquid conductivity (meas.)	10.0	R	$\sqrt{3}$	0.6	3.5	∞
Liquid permittivity (target)	5.0	R	$\sqrt{3}$	0.6	1.7	∞
Liquid permittivity (meas.)	5.0	R	$\sqrt{3}$	0.6	1.7	∞
<b>Combined Standard Uncertainty:</b>					<b>10.32</b>	
<b>Extended Standard Uncertainty (k=2):</b>					<b>20.6</b>	

N: Normal

R: Rectangular

## 9 TEST DATA

### 9.1 Head SAR Test Results

The following tables list the SAR results in each configuration and operating mode. The channels tested for each configuration have similar SAR distributions. Highest SAR (bold blue color) for each configuration is provided in Appendix B.

**KE414 Left Head SAR**

Mode	Channel #	Frequency (MHz)	Conducted Power (dBm)	SAR, 1g (mW/g)	
				Cheek Position	Tilted Position
<b>AMPS 800</b>	991	824.04	25.04	1.00	0.86
	383	836.49	25.10	<b>1.13 / 1.12*</b>	<b>1.00</b>
	799	848.97	25.05	1.06	0.90
<b>CDMA 800</b>	1013	824.70	25.02	0.93	0.83
	383	836.49	25.01	<b>1.13 / 1.12*</b>	<b>1.00</b>
	777	848.31	25.05	1.11	0.96
<b>CDMA 1900</b>	25	1851.25	23.10	1.05	<b>1.20</b>
	600	1880	23.05	0.988	0.933
	1175	1908.75	23.11	<b>1.17</b>	1.04

Note: \* tested with "backpack clip" battery cover

**KE414 Right Head SAR**

Mode	Channel # /	Frequency (MHz)	Conducted Power (dBm)	SAR, 1g (mW/g)	
				Cheek Position	Tilted Position
<b>AMPS 800</b>	991	824.04	25.04	0.838	0.795
	383	836.49	25.10	<b>0.985</b>	<b>0.949</b>
	799	848.97	25.05	0.896	0.795
<b>CDMA 800</b>	1013	824.70	25.02	0.786	0.755
	383	836.49	25.01	<b>0.996</b>	<b>0.907</b>
	777	848.31	25.05	0.952	0.845
<b>CDMA 1900</b>	25	1851.25	23.10	1.09	<b>1.46 / 1.39*</b>
	600	1880	23.05	0.838	1.01
	1175	1908.75	23.11	<b>1.05</b>	1.17

Note: \* tested with "backpack clip" battery cover

**KE434C Left Head SAR**

Mode	Channel #	Frequency (MHz)	Conducted Power (dBm)	SAR, 1g (mW/g)	
				Cheek Position	Tilted Position
<b>AMPS 800</b>	991	824.04	25.10	1.19	0.85
	383	836.49	25.13	<b>1.39 / 1.39*</b>	<b>1.02</b>
	799	848.97	25.08	1.23	0.868
<b>CDMA 800</b>	1013	824.70	25.07	1.15	0.796
	383	836.49	25.03	<b>1.29 / 1.39*</b>	<b>1.00</b>
	777	848.31	25.09	1.28	0.883
<b>CDMA 1900</b>	25	1851.25	23.02	<b>1.06</b>	<b>1.32 / 1.3*</b>
	600	1880	23.05	0.911	1.05
	1175	1908.75	23.04	1.01	1.03

Note: \* tested with "backpack clip" battery cover

**KE434C Right Head SAR**

Mode	Channel # /	Frequency (MHz)	Conducted Power (dBm)	SAR, 1g (mW/g)	
				Cheek Position	Tilted Position
<b>AMPS 800</b>	991	824.04	25.10	0.94	0.717
	383	836.49	25.13	<b>1.16</b>	<b>0.86</b>
	799	848.97	25.08	0.99	0.721
<b>CDMA 800</b>	1013	824.70	25.07	0.887	0.691
	383	836.49	25.03	<b>1.17</b>	<b>0.871</b>
	777	848.31	25.09	1.02	0.741
<b>CDMA 1900</b>	25	1851.25	23.02	0.985	<b>1.14</b>
	600	1880	23.05	0.856	0.934
	1175	1908.75	23.04	<b>1.05</b>	0.940



## 9.2 Body Worn SAR Test Result

For each mode, corresponding SAR distribution printouts of maximum results per set-up (in blue below), i.e., the device was tested with a 22.5mm air gap or with KWC leather case or with KWC universal belt clip, are shown in Appendix B. The rest of SAR distributions is substantially similar or equivalent to the plots submitted regardless of used channel.

**KE414 Waist Level SAR with KWC Body Worn Accessories**

Mode	Channel #	Frequency (MHz)	Conducted Power Before Test (dBm)	SAR, 1g (mW/g)		
				With Universal Belt Clip CE90-B1700-01	With Leather Case	22.5mm Air Separation
AMPS	991	824.04	25.04	0.432	0.332	0.385
	383	836.49	25.10	<b>0.543 / 0.532*</b>	<b>0.448</b>	<b>0.52</b>
	799	848.97	25.05	0.438	0.358	0.418
CDMA-800	1013	824.70	25.02	0.407	0.322	0.406
	383	836.49	25.01	<b>0.575 / 0.531*</b>	<b>0.460</b>	<b>0.524</b>
	777	848.31	25.05	0.468	0.378	0.426
CDMA-1900	25	1851.25	23.10	<b>0.505 / 0.451*</b>	<b>0.47</b>	<b>0.504</b>
	600	1880.00	23.05	0.451	0.39	0.395
	1175	1908.75	23.11	0.436	0.381	0.360

Note: \* tested with "backpack clip" battery cover

**KE424C Waist Level SAR with KWC Body Worn Accessories**

Mode	Channel #	Frequency (MHz)	Conducted Power Before Test (dBm)	SAR, 1g (mW/g)		
				With Universal Belt Clip CE90-B1700-01	With Leather Case	22.5mm Air Separation
AMPS	991	824.04	25.10	0.428	0.348	0.484
	383	836.49	25.13	<b>0.605</b>	<b>0.449</b>	<b>0.652 / 0.686*</b>
	799	848.97	25.08	0.417	0.350	0.485
CDMA-800	1013	824.70	25.07	0.414	0.314	0.439
	383	836.49	25.03	<b>0.569</b>	<b>0.470</b>	<b>0.658 / 0.726*</b>
	777	848.31	25.09	0.473	0.354	0.475
CDMA-1900	25	1851.25	23.02	<b>0.497</b>	<b>0.407</b>	<b>0.516 / 0.524*</b>
	600	1880.00	23.05	0.431	0.325	0.450
	1175	1908.75	23.04	0.429	0.355	0.379

Note: \* tested with "backpack clip" battery cover

**TEST SETUP PHOTOS**

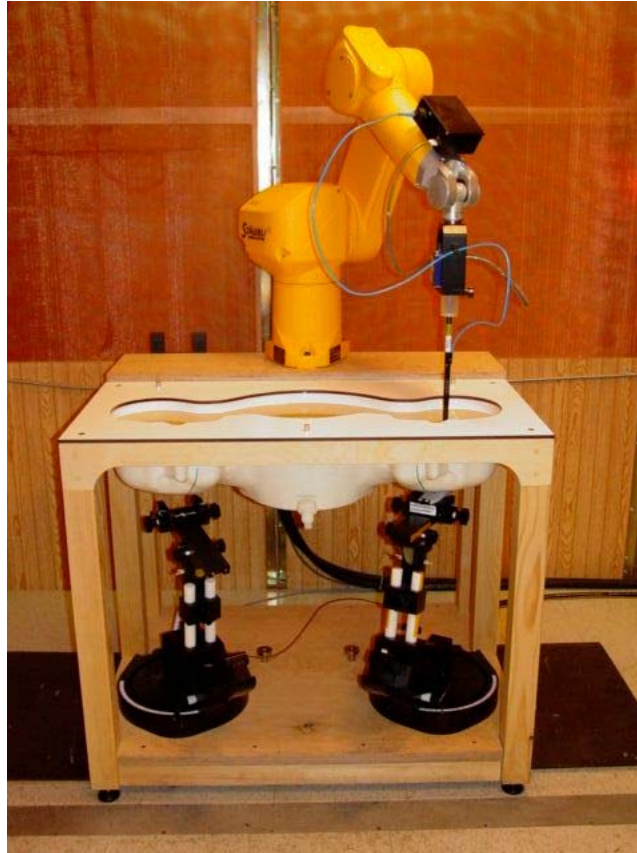


Figure 10.1 DASY 3 System

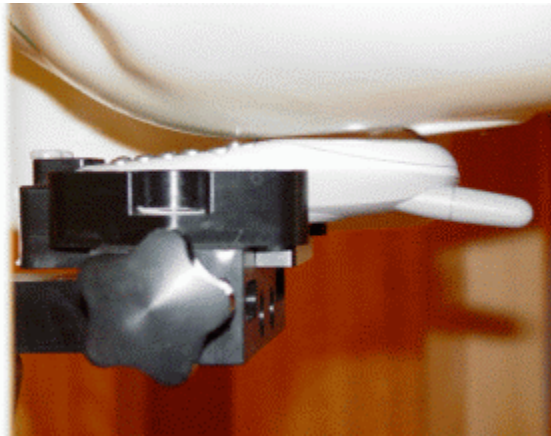


Figure 10.2 KE414 phone against the head (left cheek position)

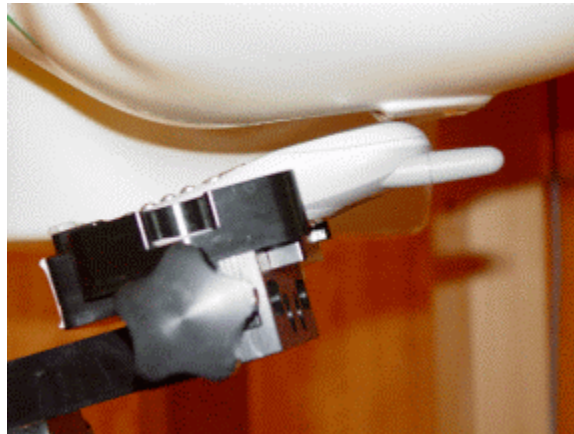


Figure 10.3 KE414 phone against the head (left tilt position)

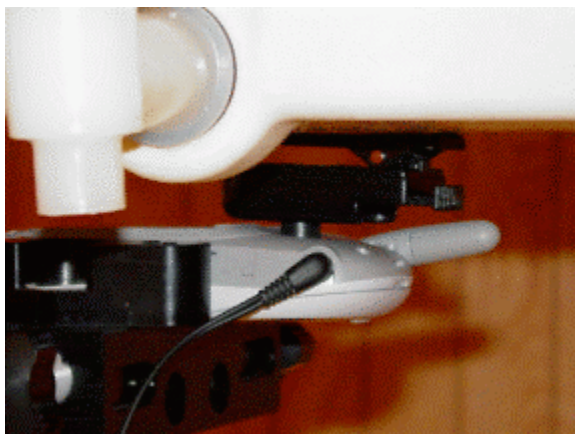


Figure 10.4 KE414 body SAR setup (with belt clip)



Figure 10.5 KE414 body SAR setup (with leather case)

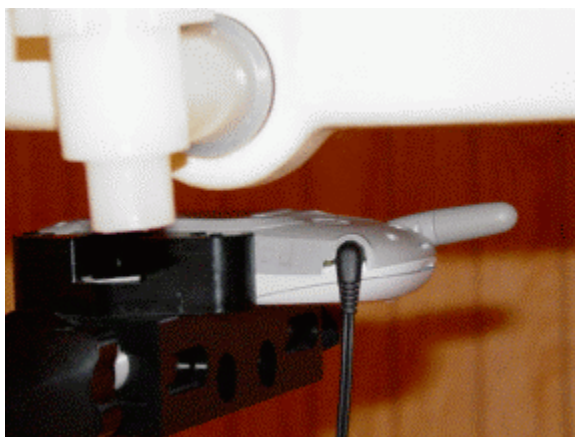


Figure 10.6 KE414 body SAR setup (with 22.5mm air separation)

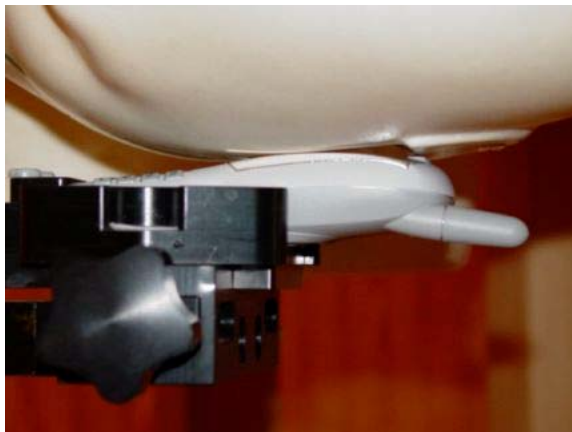


Figure 10.7 KE424C phone against the head (left cheek position)



Figure 10.8 KE424C phone against the head (left tilt position)



Figure 10.9 KE424C body SAR setup (with belt clip)



Figure 10.10 KE424C body SAR setup (with leather case)



Figure 10.11 KE424C body SAR setup (with 22.5mm air separation)

## **Appendix A: Validation test printout**



For Model: KE414

04/07/03

### Dipole validation:

Liquid Temp = 22C +/- deg. 1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm

for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 835MHz

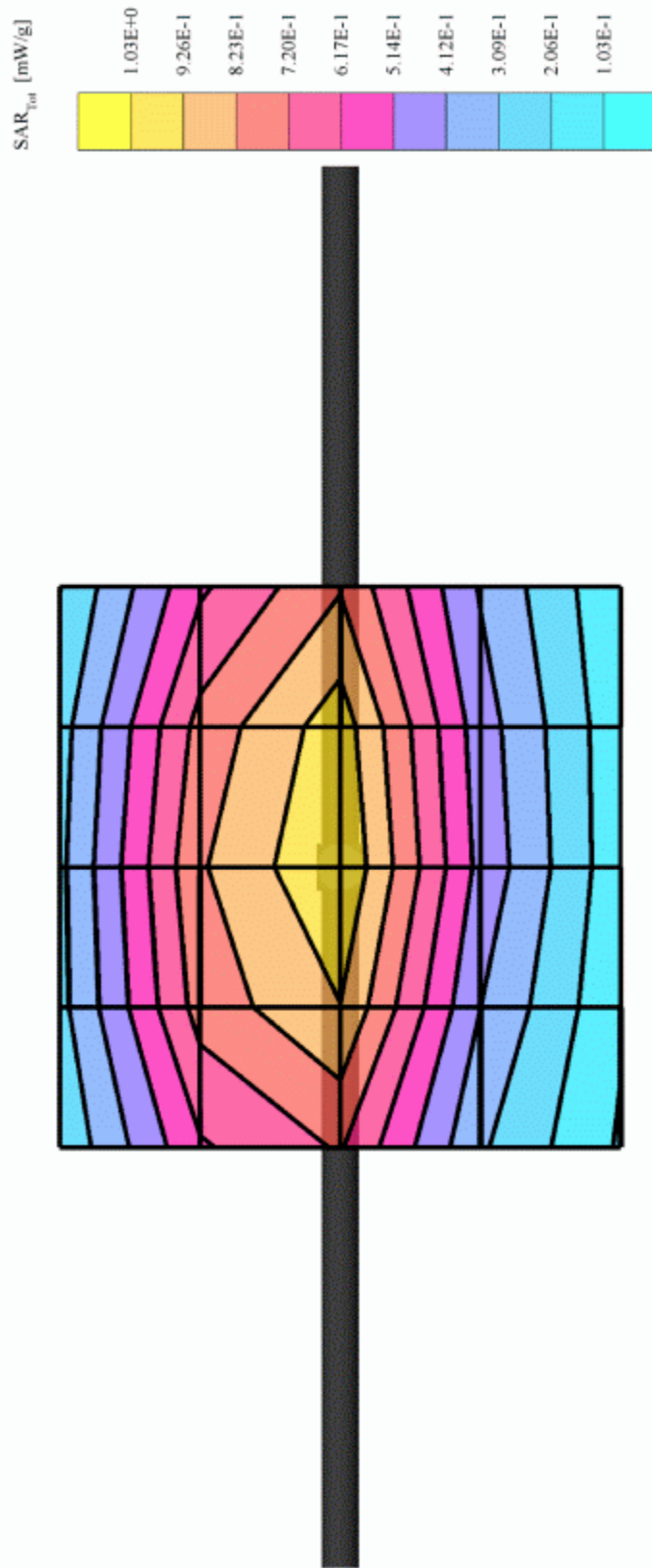
SAMI Phantom; Flat Section; Position: (90° 90°); Frequency: 835 MHz

Probe: ET3DV6 - SN1712; ConvF(6.50,6.50,6.50); Crest factor: 1.0; 835 MHz Brain:  $\sigma = 0.87$  mho/m  $\epsilon_r = 42.5$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 1.01 mW/g  $\pm 0.04$  dB, SAR (10g): 0.640 mW/g  $\pm 0.05$  dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: 0.05 dB



KWC



For model: KE414 (for Muscle measurements)

04/08/03

# Dipole validation:

Liquid Temp = 22C +/- deg. 1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm

for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 835MHz

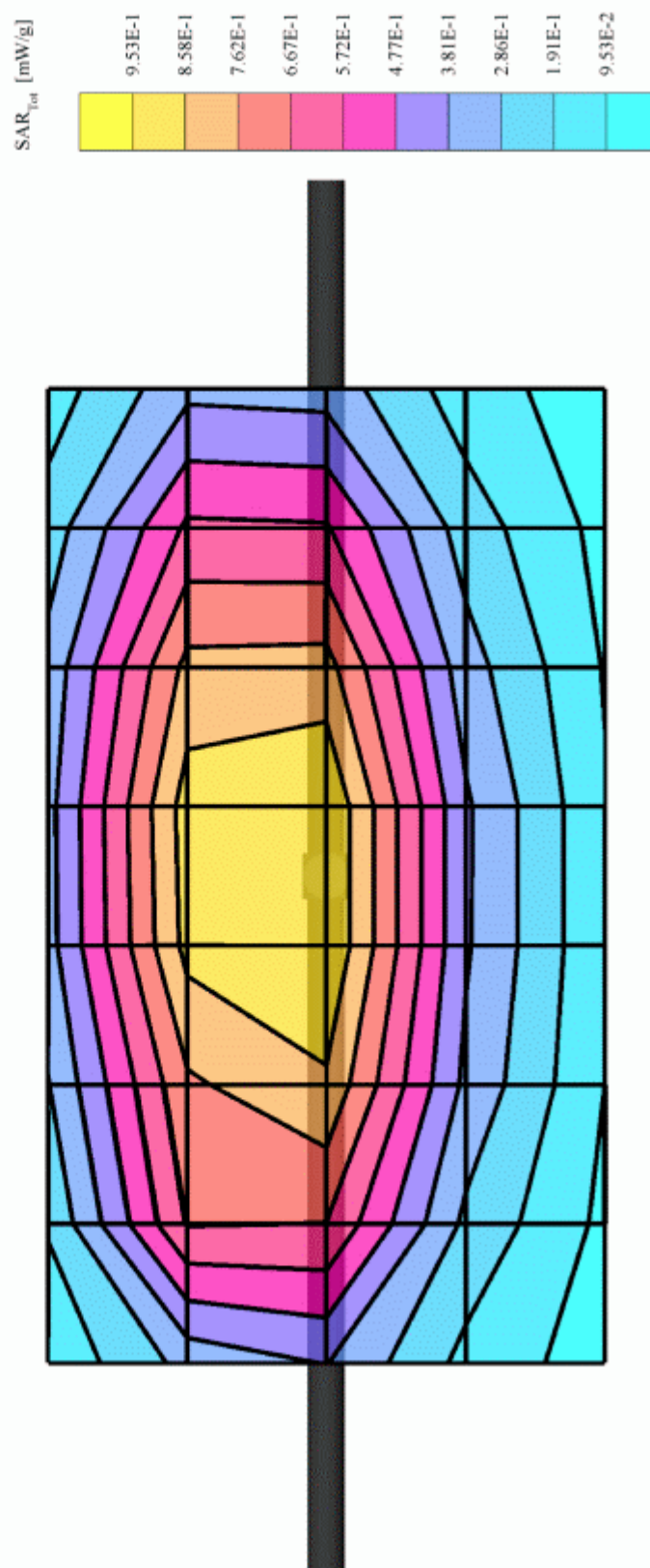
SAM Phantom, Flat Section, Position: (90°, 90°), Frequency: 835 MHz

Probe: ET3DV6 - SN1712; ConvF(6.50,6.50,6.50); Crest factor: 1.0; 835 MHz Brain:  $\sigma = 0.87$  mho/m  $\epsilon_r = 42.0$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 1.00 mW/g  $\pm 0.07$  dB, SAR (10g): 0.640 mW/g  $\pm 0.06$  dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: 0.08 dB



KWC

For Model: 414

04/08/03

### Dipole validation:

Liquid Temp = 22C +/- deg.1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm  
for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 1900MHz

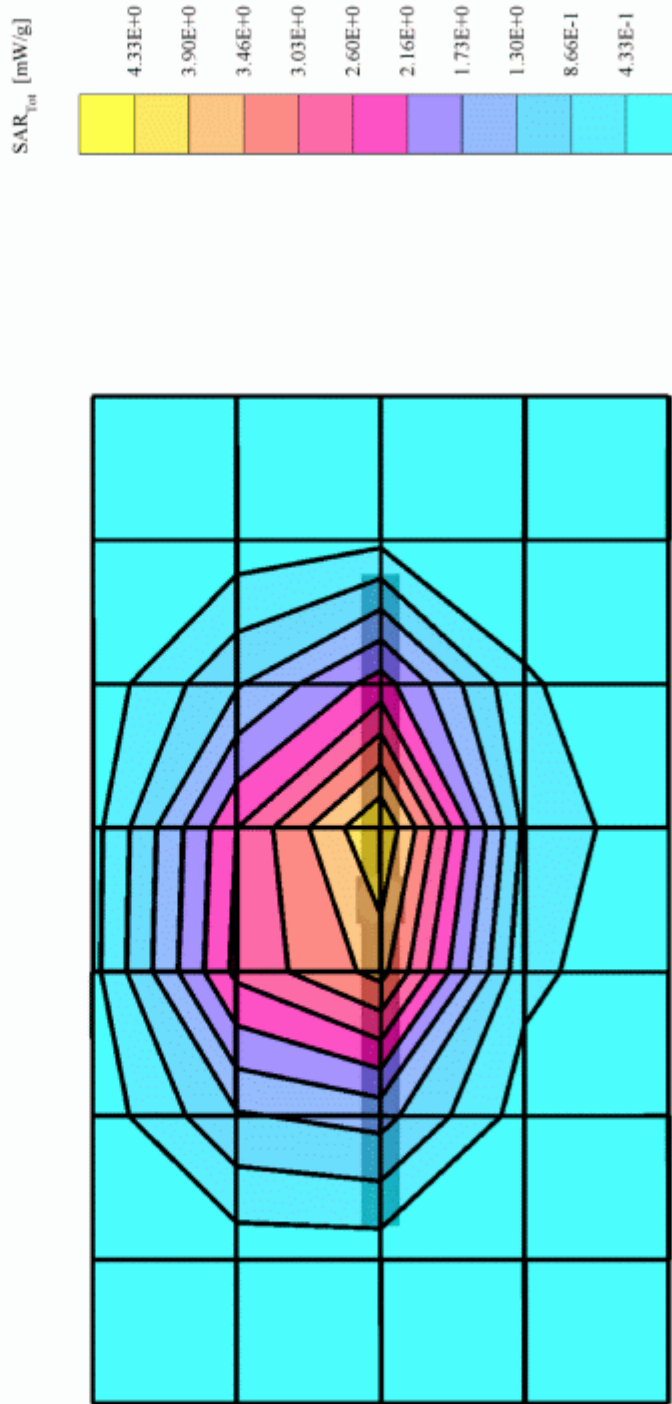
SAM Phantom, Flat Section, Position: (90°, 90°), Frequency: 1900 MHz

Probe: ET3DV6 - SN1712; ConvF(5.40,5.40,5.40); Crest factor: 1.0; 1900 MHz Brain:  $\sigma = 1.44$  mho/m  $\epsilon_r = 39.9$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 4.43 mW/g  $\pm 0.02$  dB, SAR (10g): 2.25 mW/g  $\pm 0.04$  dB, (Worst-case extrapolation)

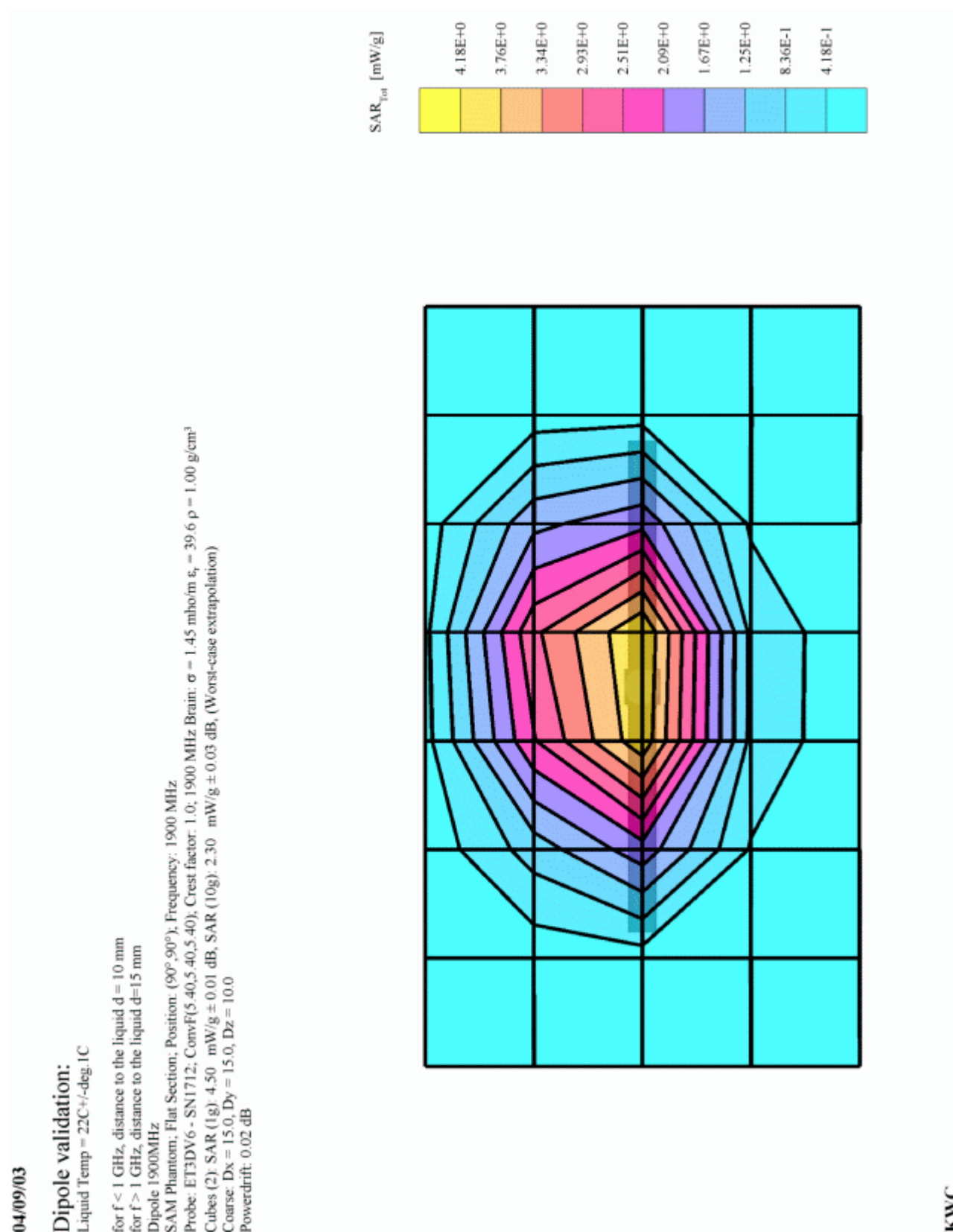
Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: -0.01 dB



KWC

For model: KE414 (for Muscle measurements)



For Model: 414

04/17/03

### Dipole validation:

Liquid Temp = 22C $\pm$ 1-deg.1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm

for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 1900 MHz

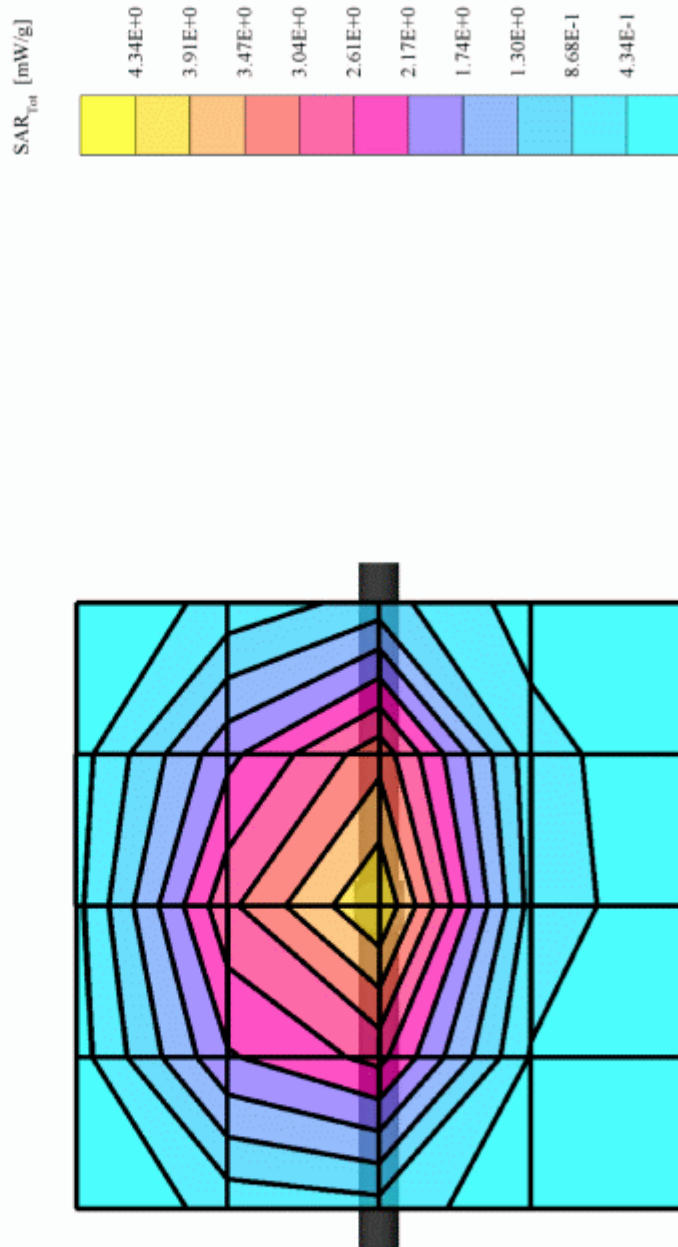
SAM Phantom; Flat Section; Position: (90 $^{\circ}$ , 90 $^{\circ}$ ); Frequency: 1900 MHz

Probe: ET3DV/6 - SN1712; ConvF(5.40,5.40,5.40); Crest factor: 1.0; 1900 MHz Brain:  $\sigma = 1.44$  mho/m  $\epsilon_r = 39.7$   $\rho = 1.00$  g/cm $^3$ 

Cubes (2): SAR (1g): 4.47 mW/g  $\pm$  0.02 dB, SAR (10g): 2.27 mW/g  $\pm$  0.05 dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: -0.02 dB



KWC



For Model: 424C

03/28/03

### Dipole validation:

Liquid Temp = 22C +/- deg. 1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm

for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 835MHz

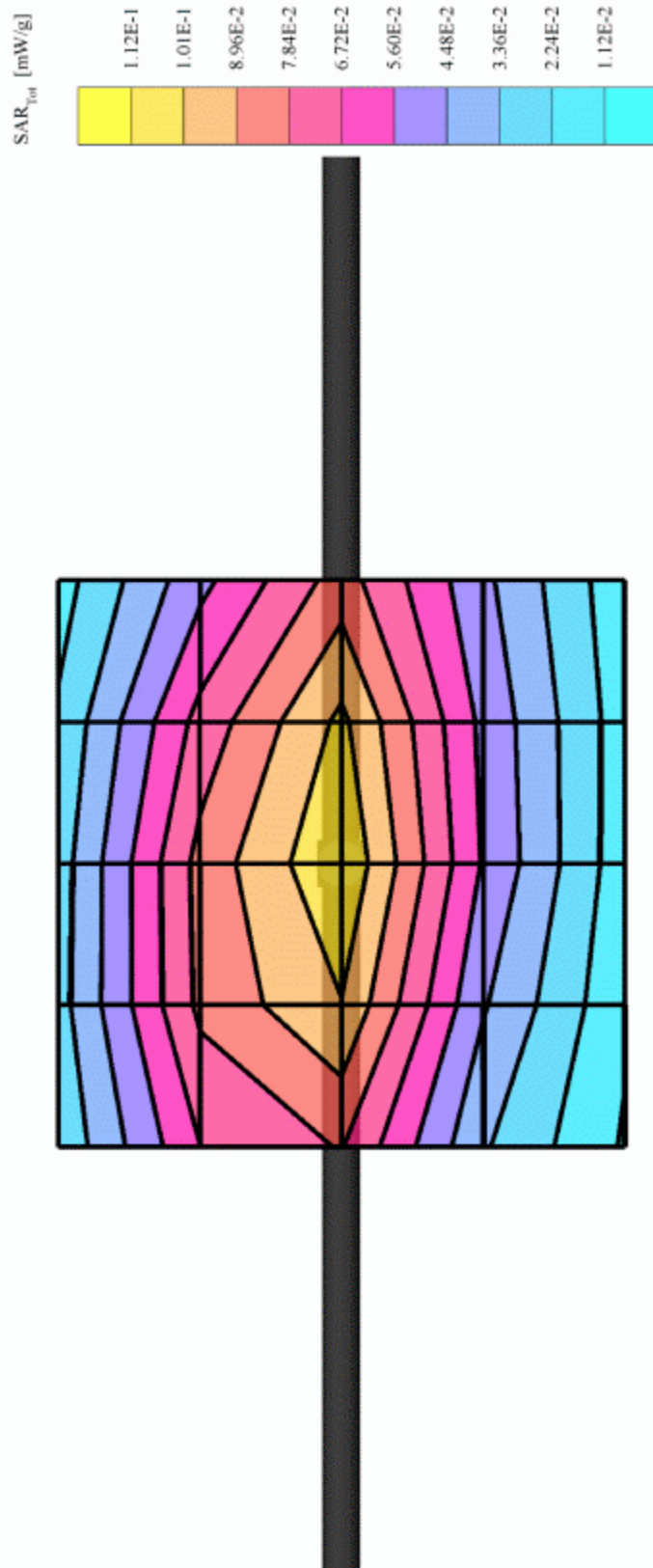
SAMI Phantom; Flat Section; Position: (90°, 90°); Frequency: 835 MHz

Probe: ET3DV6 - SN1712; ConvF(6.50,6.50,6.50); Crest factor: 1.0; 835 MHz Brain:  $\sigma = 0.87$  mho/m  $\epsilon_r = 41.3$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 0.105 mW/g  $\pm 0.00$  dB, SAR (10g): 0.0669 mW/g  $\pm 0.01$  dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: -0.03 dB



KWC



For Model: 424C

03/28/03

# Dipole validation:

Liquid Temp = 22C +/- deg. 1C

for  $f < 1$  GHz, distance to the liquid  $d = 10$  mm

for  $f > 1$  GHz, distance to the liquid  $d = 15$  mm

Dipole 835MHz

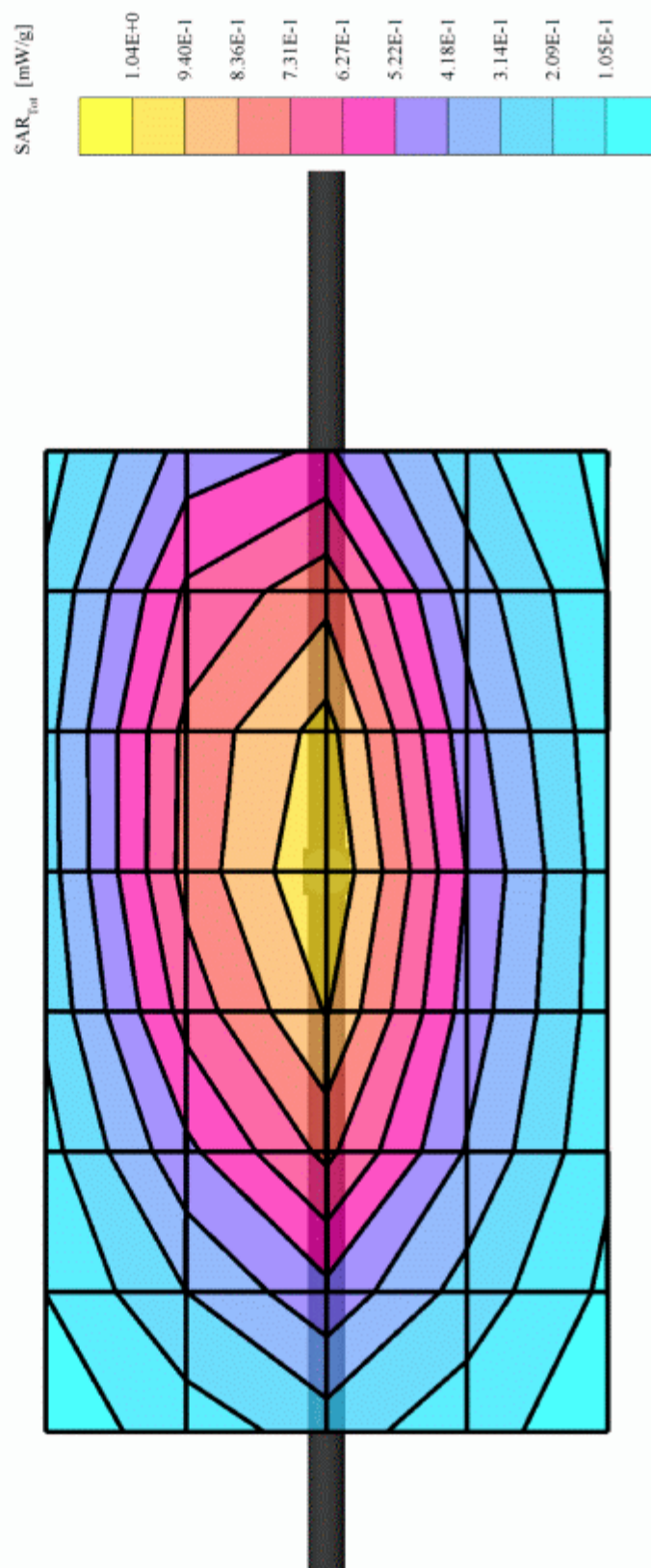
SAMI Phantom; Flat Section; Position: (90°, 90°); Frequency: 835 MHz

Probe: ET3DV6 - SN1712; ConvF(6.50,6.50,6.50); Crest factor: 1.0; 835 MHz Brain:  $\sigma = 0.88$  mho/m  $\epsilon_r = 42.1$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 1.02 mW/g  $\pm 0.01$  dB, SAR (10g): 0.649 mW/g  $\pm 0.01$  dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

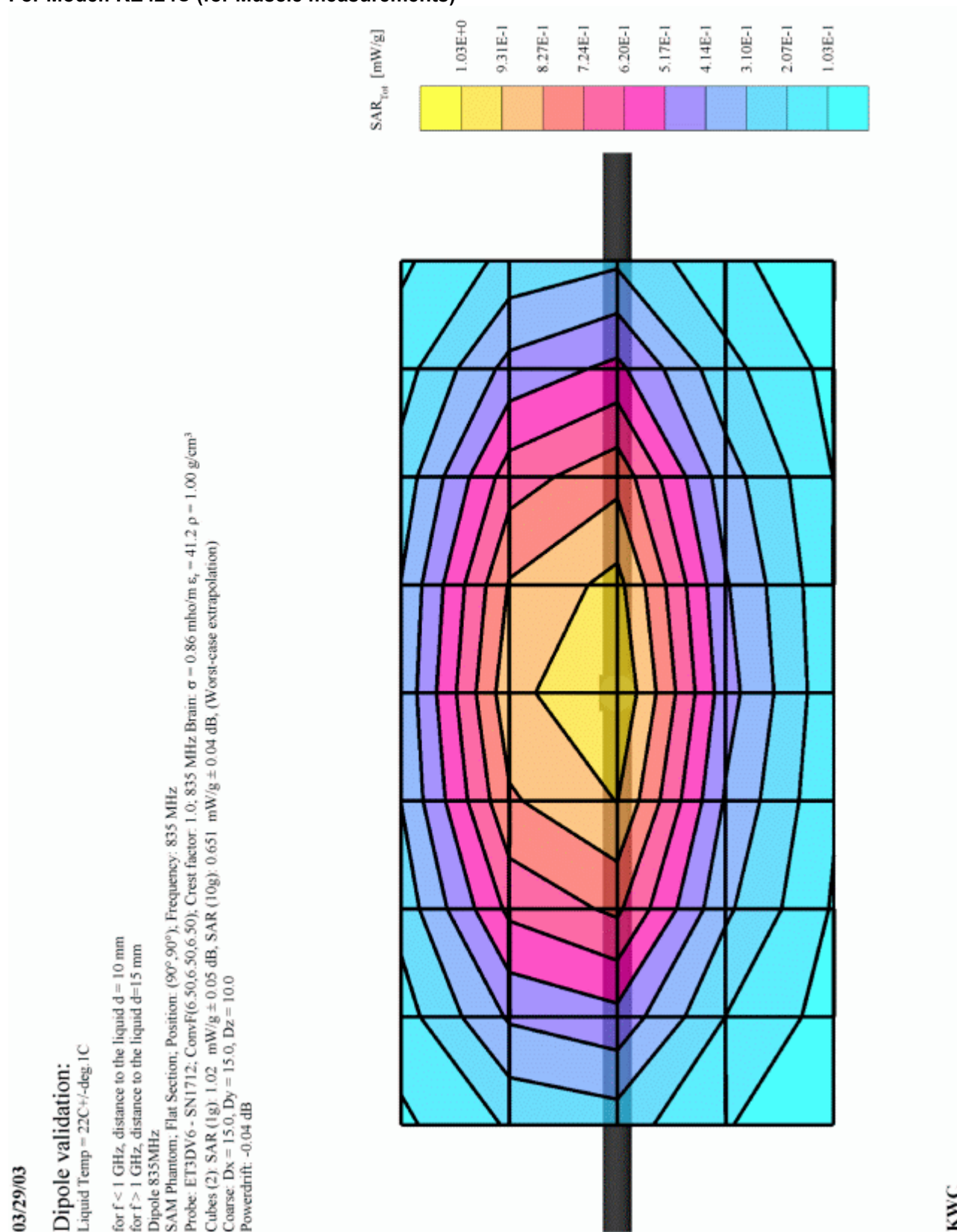
Powerdrift: 0.11 dB



KWC



For Model: KE424C (for Muscle measurements)



For Model: KE424C

03/30/03

### Dipole validation:

Liquid Temp = 22C $\pm$ deg.1C

for f &lt; 1 GHz, distance to the liquid d = 10 mm

for f &gt; 1 GHz, distance to the liquid d=15 mm

Dipole 1900MHz

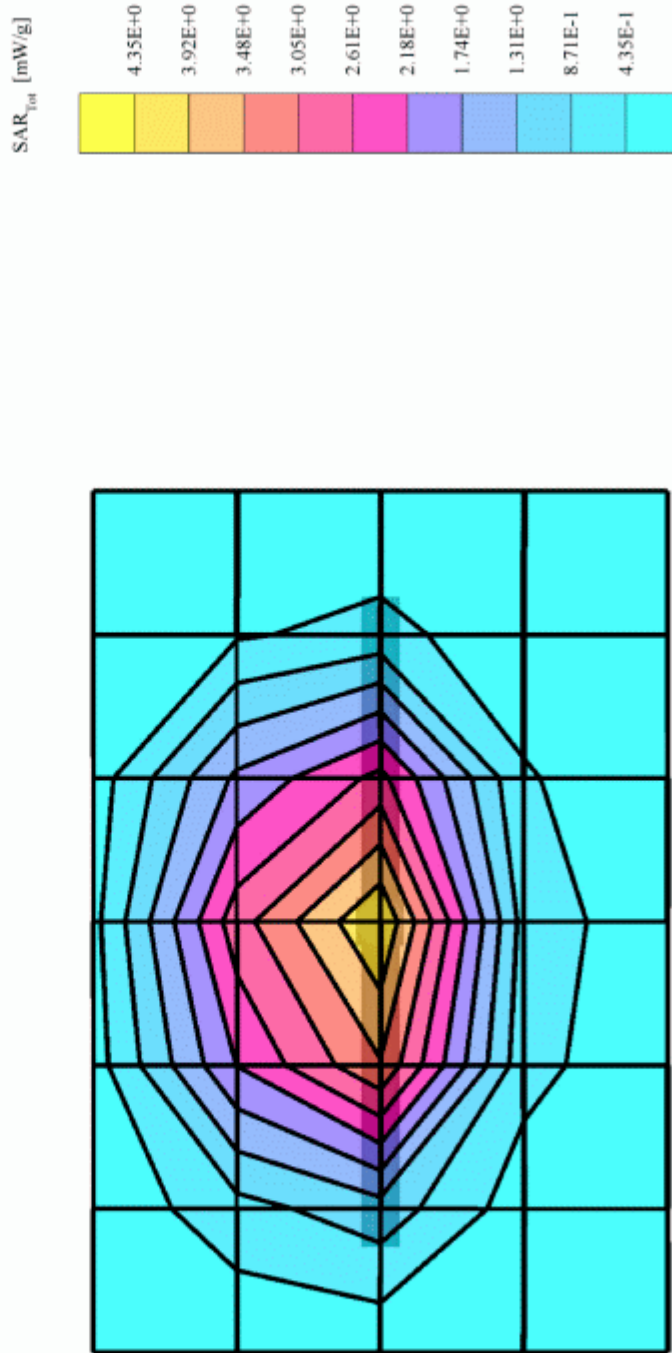
SAM Phantom; Flat Section; Position: (90 $^{\circ}$ , 90 $^{\circ}$ ); Frequency: 1900 MHz

Probe: ET3DV6 - SN1712; ConvF(5.40,5.40,5.40); Crest factor: 1.0; 1900 MHz Brain:  $\sigma$  = 1.42 mho/m  $\epsilon_r$  = 39.1  $\rho$  = 1.00 g/cm $^3$ 

Cubes (2): SAR (1g): 4.41 mW/g  $\pm$  0.02 dB, SAR (10g): 2.24 mW/g  $\pm$  0.03 dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: -0.02 dB



KWC

For Model: KE424C

03/30/03

# Dipole validation:

Liquid Temp = 22C<sup>±</sup>,-deg. 1C

for f &lt; 1 GHz, distance to the liquid d = 10 mm

for f &gt; 1 GHz, distance to the liquid d=15 mm

Dipole 1900MHz

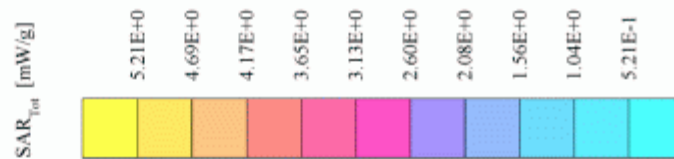
SAMI Phantom; Flat Section; Position: (90°, 90°); Frequency: 1900 MHz

Probe: ET3DV6 - SN1712; ConvF(5 40,5 40,5 40); Crest factor: 1.0; 1900 MHz Beam:  $\sigma = 1.44$  mho/m  $\epsilon_r = 40.0$   $\rho = 1.00$  g/cm<sup>3</sup>

Cubes (2): SAR (1g): 4.45 mW/g  $\pm$  0.05 dB, SAR (10g): 2.26 mW/g  $\pm$  0.06 dB, (Worst-case extrapolation)

Coarse: Dx = 15.0, Dy = 15.0, Dz = 10.0

Powerdrift: -0.12 dB



KWC

## **Appendix B: SAR distribution printout**

*Please see separate attachment*

## **Appendix C: probe calibration parameters**

(10 pages)

039877

**Schmid & Partner  
Engineering AG**

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

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**Calibration Certificate****Dosimetric E-Field Probe**

Type:

**ET3DV6**

Serial Number:

**1712**

Place of Calibration:

**Zurich**

Date of Calibration:

**September 6, 2002**

Calibration Interval:

**12 months**


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:



**Schmid & Partner  
Engineering AG**

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

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# Probe ET3DV6

## SN:1712

Manufactured:	August 7, 2002
Last calibration:	September 6, 2002

**Calibrated for DASY Systems**

(Note: non-compatible with DASY2 system!)

ET3DV6 SN:1712

September 6, 2002

## DASY - Parameters of Probe: ET3DV6 SN:1712

### Sensitivity in Free Space

NormX	<b>1.59</b> $\mu\text{V}/(\text{V}/\text{m})^2$
NormY	<b>1.53</b> $\mu\text{V}/(\text{V}/\text{m})^2$
NormZ	<b>1.61</b> $\mu\text{V}/(\text{V}/\text{m})^2$

### Diode Compression

DCP X	<b>95</b>	mV
DCP Y	<b>95</b>	mV
DCP Z	<b>95</b>	mV

### Sensitivity in Tissue Simulating Liquid

Head	<b>900 MHz</b>	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.97 \pm 5\% \text{ mho/m}$
Head	<b>835 MHz</b>	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.90 \pm 5\% \text{ mho/m}$
ConvF X	<b>6.5</b> $\pm 9.5\%$ (k=2)	Boundary effect:	
ConvF Y	<b>6.5</b> $\pm 9.5\%$ (k=2)	Alpha	<b>0.33</b>
ConvF Z	<b>6.5</b> $\pm 9.5\%$ (k=2)	Depth	<b>2.72</b>
Head	<b>1800 MHz</b>	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\% \text{ mho/m}$
Head	<b>1900 MHz</b>	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\% \text{ mho/m}$
ConvF X	<b>5.4</b> $\pm 9.5\%$ (k=2)	Boundary effect:	
ConvF Y	<b>5.4</b> $\pm 9.5\%$ (k=2)	Alpha	<b>0.48</b>
ConvF Z	<b>5.4</b> $\pm 9.5\%$ (k=2)	Depth	<b>2.52</b>

### Boundary Effect

Head	900 MHz	Typical SAR gradient: 5 % per mm		
	Probe Tip to Boundary		1 mm	2 mm
	SAR <sub>be</sub> [%]	Without Correction Algorithm	9.8	5.7
	SAR <sub>be</sub> [%]	With Correction Algorithm	0.4	0.6
Head	1800 MHz	Typical SAR gradient: 10 % per mm		
	Probe Tip to Boundary		1 mm	2 mm
	SAR <sub>be</sub> [%]	Without Correction Algorithm	12.3	8.2
	SAR <sub>be</sub> [%]	With Correction Algorithm	0.1	0.2

### Sensor Offset

Probe Tip to Sensor Center	<b>2.7</b>	mm
Optical Surface Detection	<b>1.3 <math>\pm</math> 0.2</b>	mm

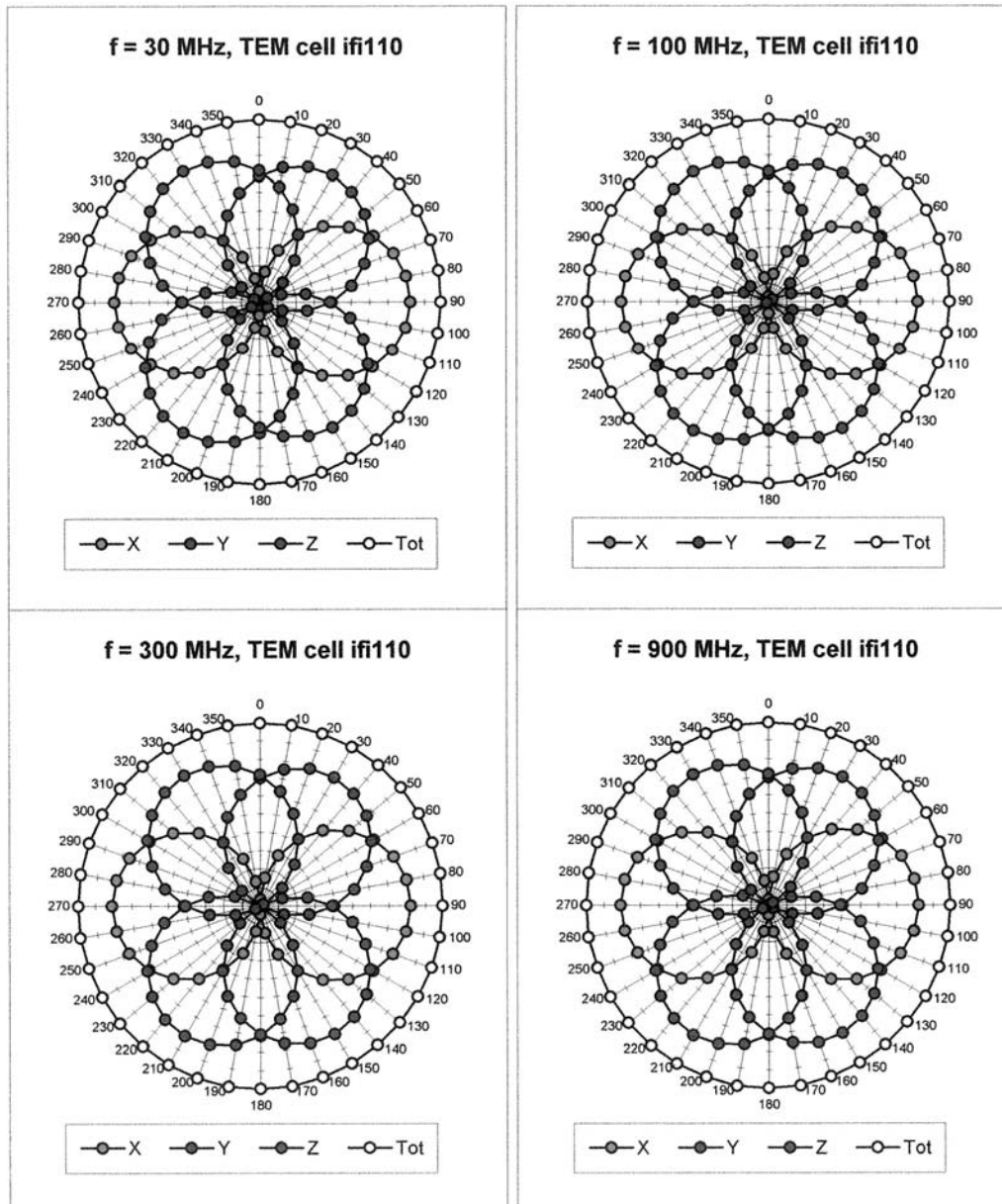
- - -



ET3DV6 SN:1712

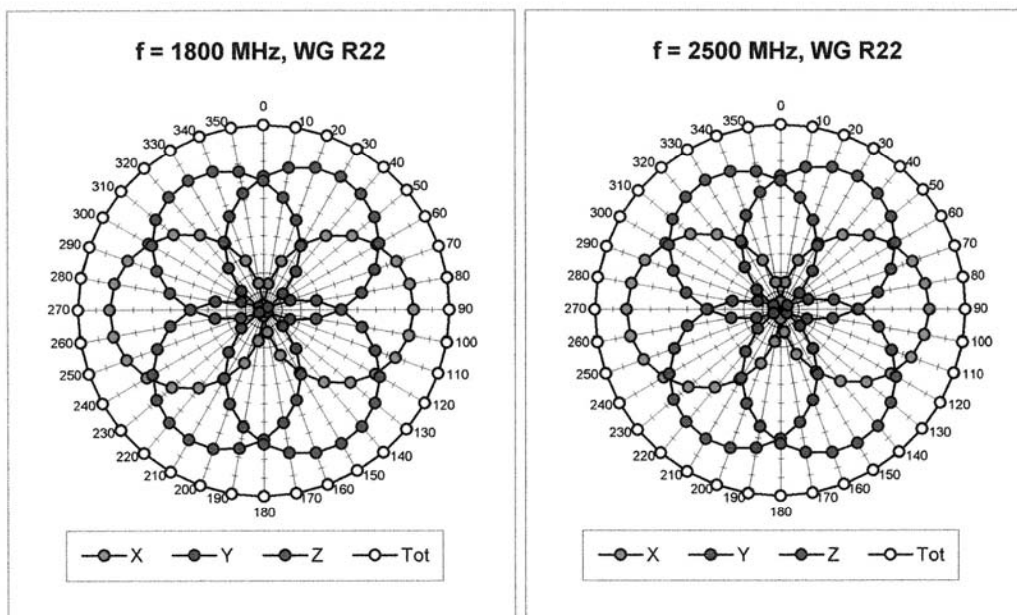
September 6, 2002

## Receiving Pattern ( $\phi$ ), $\theta = 0^\circ$

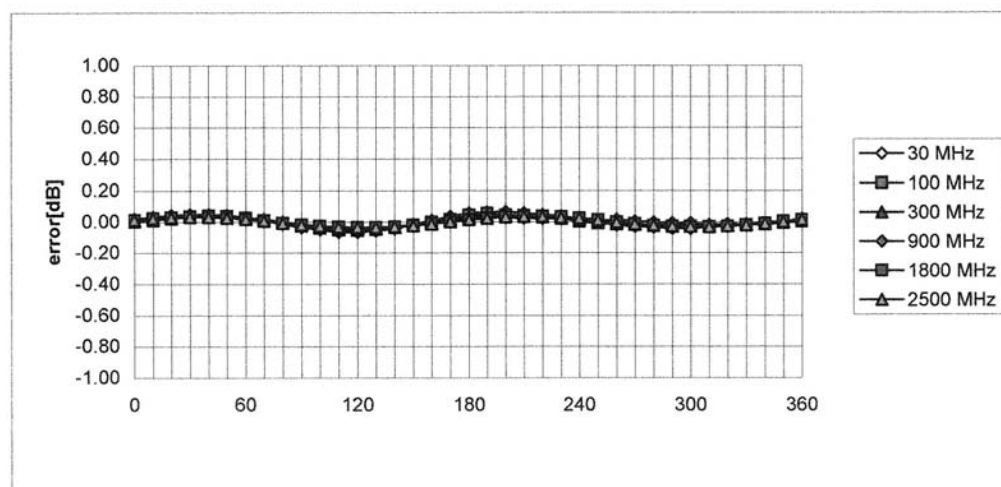


ET3DV6 SN:1712

September 6, 2002



### Isotropy Error ( $\phi$ ), $\theta = 0^\circ$

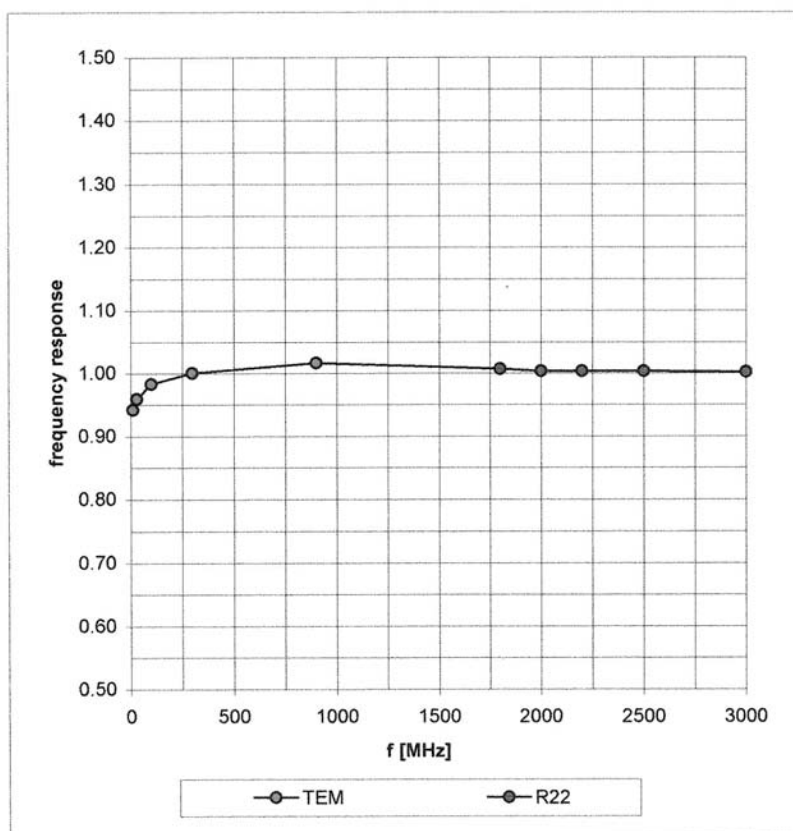


ET3DV6 SN:1712

September 6, 2002

## Frequency Response of E-Field

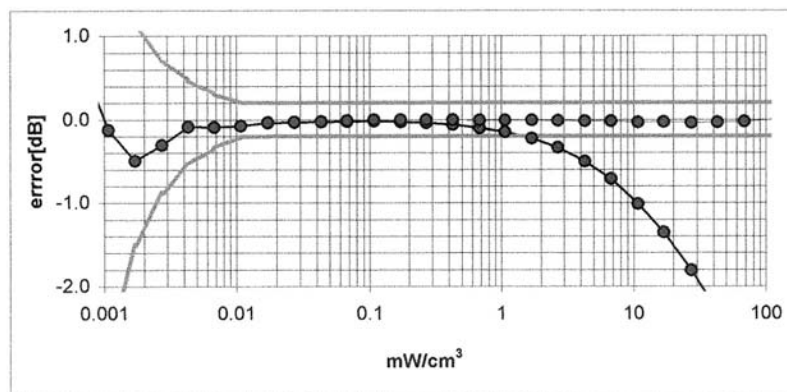
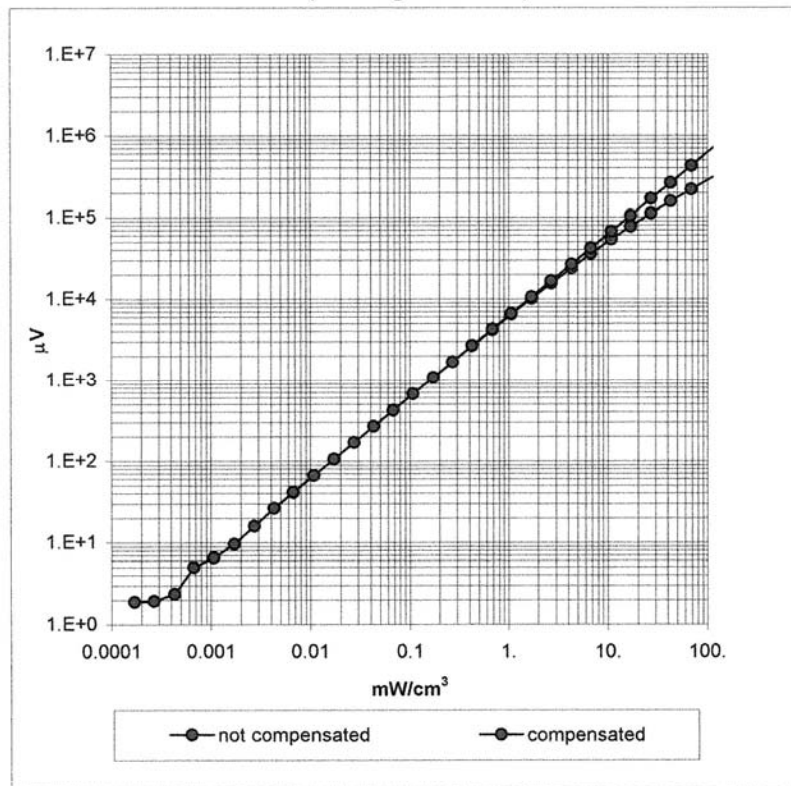
( TEM-Cell:ifi110, Waveguide R22)



ET3DV6 SN:1712

September 6, 2002

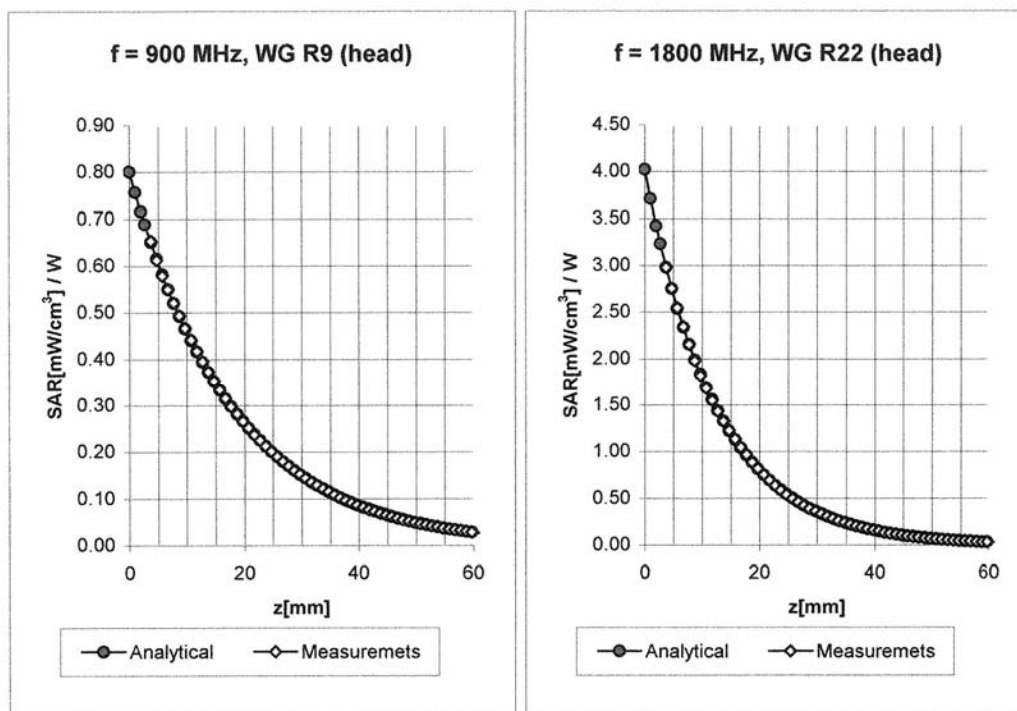
# Dynamic Range f(SAR<sub>brain</sub>) ( Waveguide R22 )



ET3DV6 SN:1712

September 6, 2002

## Conversion Factor Assessment

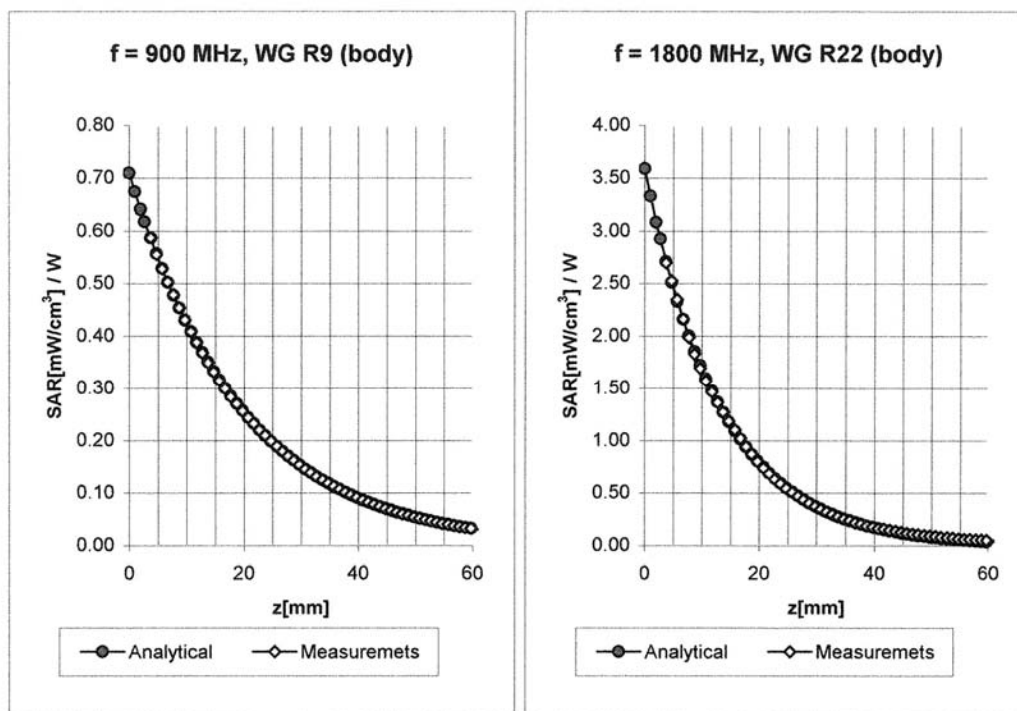


Head	900 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.97 \pm 5\%$ mho/m
Head	835 MHz	$\epsilon_r = 41.5 \pm 5\%$	$\sigma = 0.90 \pm 5\%$ mho/m
	ConvF X	$6.5 \pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	$6.5 \pm 9.5\%$ (k=2)	Alpha <b>0.33</b>
	ConvF Z	$6.5 \pm 9.5\%$ (k=2)	Depth <b>2.72</b>
Head	1800 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
Head	1900 MHz	$\epsilon_r = 40.0 \pm 5\%$	$\sigma = 1.40 \pm 5\%$ mho/m
	ConvF X	$5.4 \pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	$5.4 \pm 9.5\%$ (k=2)	Alpha <b>0.48</b>
	ConvF Z	$5.4 \pm 9.5\%$ (k=2)	Depth <b>2.52</b>

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## Conversion Factor Assessment



Body	900 MHz	$\epsilon_r = 55.0 \pm 5\%$	$\sigma = 1.05 \pm 5\%$ mho/m
Body	835 MHz	$\epsilon_r = 55.2 \pm 5\%$	$\sigma = 0.97 \pm 5\%$ mho/m
	ConvF X	<b>6.3</b> $\pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	<b>6.3</b> $\pm 9.5\%$ (k=2)	Alpha <b>0.41</b>
	ConvF Z	<b>6.3</b> $\pm 9.5\%$ (k=2)	Depth <b>2.49</b>
Body	1800 MHz	$\epsilon_r = 53.3 \pm 5\%$	$\sigma = 1.52 \pm 5\%$ mho/m
Body	1900 MHz	$\epsilon_r = 53.3 \pm 5\%$	$\sigma = 1.52 \pm 5\%$ mho/m
	ConvF X	<b>5.0</b> $\pm 9.5\%$ (k=2)	Boundary effect:
	ConvF Y	<b>5.0</b> $\pm 9.5\%$ (k=2)	Alpha <b>0.60</b>
	ConvF Z	<b>5.0</b> $\pm 9.5\%$ (k=2)	Depth <b>2.30</b>

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## Deviation from Isotropy in HSL

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

