



6660 – B Dobbin Road Columbia, MD 21045 USA Telephone 410.290.6652 / Fax 410.290.6654

http://www.pctestlab.com (email: randy@pctestlab.com)



Class II Change (FCC/ RSS-102)



**APPLICANT NAME & ADDRESS:** 

IBM Corporation New Orchard Rd, Armonk, NY 10504 DATE & LOCATION OF TESTING: Dates of Tests: January 6-12, 2005

Test Report S/N: SAR.0501050004-R3.ANO Test Site: PCTEST Lab, Columbia, MD USA

IC Lab File No.: IC 2451

FCC ID: ANO20040501CX2
IC CERTIFICATION NUMBER: 349E-WM3B22BG
APPLICANT NAME: IBM CORPORATION

EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/ 1867/ 1868/

1869 w/ 802.11b/g WLAN Adapter

Tx Frequency: 2412 – 2462 MHz
Max. RF Output Power: 0.0514 W Conducted

Max. SAR Measurement: 1.01 W/kg 802.11b Body SAR; 0.519 W/kg 802.11g Body SAR

Trade Name/Model(s): WM3B2200BG

FCC Rule Part(s): §2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]

Industry Canada Rule(s): RSS-102 (SAR), Safety Code 6 Health Canada

Application Type: Certification

Test Device Serial No.: Identical Prototype [S/N: 006FA0473ADC55371003]

Original Grant Date: March 4, 2004

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001), IEEE Std. P1528 (August 2003) and Industry Canada RSS-102.

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

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.







PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IE	Reviewed by: Quality Manager	
SAR Filename:	Test Dates:	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model:	FCC ID:	IC ID:	Page 1 of 28
SAR.0501050004-R3.ANO	Jan. 6-12, 2005	1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	ANO20040501CX2	349E-WM3B22BG	1 490 1 01 20



# **TABLE OF CONTENTS**

1.	INTRODUCTION / SAR DEFINITION	3
2.	SAR MEASUREMENT SETUP	4
3.	DASY4 E-FIELD PROBE SYSTEM	5
4.	Probe Calibration Process	6
5.	PHANTOM & EQUIVALENT TISSUES	7
6.	TEST SYSTEM SPECIFICATIONS.	8
7.	DOSIMETRIC ASSESSMENT & PHANTOM SPECS	9
8.	ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS	10
9.	MEASUREMENT UNCERTAINTIES	11
10.	SAR TEST DATA SUMMARY	12
11.	SAR TEST EQUIPMENT	13
12.	CONCLUSION.	14
13.	REFERENCES	15
EXH	IIBIT A. SYSTEM VERIFICATION	16
EXH	IIBIT A. SAR DATA SUMMARY17-	.24
ATT	ACHEMNT A. SAR TEST DATA2!	5
ATT	ACHMENT B. SAR TEST SETUP PHOTOGRAPHS20	6
ATT	ACHMENT C. DIPOLE VALIDATION27	7
ATT	ACHMENT D. PROBE CALIBRATION28	8

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 2 of 28



### INTRODUCTION / SAR DEFINITION

The FCC has adopted the guidelines for evaluating the environmental effects of radiofrequency radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices.[1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in *IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.* (c) 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.[2] The measurement procedure described in *IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave*[3] is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in *Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,* NCRP Report No. 86 (c) NCRP, 1986, Bethesda, MD 20814.[6] SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

#### **SAR Definition**

Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density ( $\mathbf{r}$ ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 1.1).

$$S A R = \frac{d}{d t} \left( \frac{d U}{d m} \right) = \frac{d}{d t} \left( \frac{d U}{r d v} \right)$$

Figure 1.1 SAR Mathematical Equation

SAR is expressed in units of Watts per Kilogram (W/kg).

SAR =  $sE^2/r$ where: s = conductivity of the tissue-simulant material (S/m) r = mass density of the tissue-simulant material (kg/m³) E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 3 of 28



## 2. SAR MEASUREMENT SETUP

## **Robotic System**

Measurements are performed using the DASY4 automated dosimetric assessment system. The DASY4 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, Pentium III computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 2.1).

## **System Hardware**

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Gateway Pentium 4 2.53 GHz computer with Windows XP system and SAR Measurement Software DASY4, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

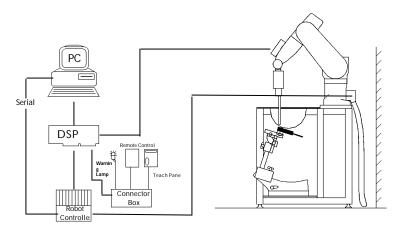


Figure 2.1 SAR Measurement System Setup

## **System Electronics**

The DAE4 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 PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail in [7].

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Æ.	Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter		IC ID: 349E-WM3B22BG	Page 4 of 28



## DASY4 E-FIELD PROBE SYSTEM

## **Probe Measurement System**



Figure 3.1 DAE System

The SAR measurements were conducted with the dosimetric probe EX3DV4, designed in the classical triangular configuration [7] (see Fig. 3.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multifiber line ending at the front of the probe tip (see Fig. 3.3). It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY4 software reads the reflection during a software approach and looks for the maximum using a 2<sup>rd</sup> order fitting (see Fig.3.1). The approach is stopped at reaching the maximum.

## **Probe Specifications**

Calibration: In air from 10 MHz to 6 GHz

In brain and muscle simulating tissue at Frequencies of 150 MHz, 450 MHz, 835 MHz, 900 MHz, 1900MHz, 2450MHz, 5300MHz,

& 5800MHz

Frequency: 10 MHz to > 6 GHz; Linearity:  $\pm$  0.2 dB

(30 MHz to 6 GHz)

Directivity:  $\pm 0.2$  dB in HSL (rotation around probe axis)

 $\pm$  0.4 dB in HSL (rotation normal probe axis)

Dynamic: 5 : W/g to > 100 mW/g;Range: Linearity:  $\pm 0.2 \text{ dB}$ Dimensions: Overall length: 330 mm

> Tip length: 16 mm Body diameter: 12 mm Tip diameter: 3 mm

Distance from probe tip to dipole centers: 2 mm

Application: General dosimetry up to 6 GHz

Compliance tests of mobile phones

Fast automatic scanning in arbitrary phantoms

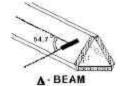


Figure 3.1 Triangular Probe Configuration



Figure 3.2 Probe Thick-Film Technique

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	, and a second	<b>Reviewed by:</b> Quality Manager
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 5 of 28



## 4. Probe Calibration Process

### **Dosimetric Assessment Procedure**

Each probe is calibrated according to a dosimetric assessment procedure described in [8] with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure described in [9] and found to be better than +/-0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe is tested.

## **Free Space Assessment**

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz (see Fig. 4.1), and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

## **Temperature Assessment \***

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe (see Fig. 4.2).

$$SAR = C\frac{\Delta T}{\Delta t}$$

where:

 $\Delta t$  = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

 $\Delta T$  = temperature increase due to RF exposure.

SAR is proportional to  $\Delta T/\Delta t$ , the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

$$SAR = \frac{\left| \mathbf{E} \right|^2 \cdot \mathbf{s}}{\mathbf{r}}$$

where:

s = simulated tissue conductivity,

r = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

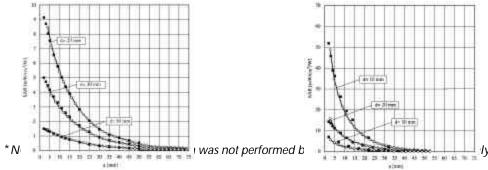


Figure 4.1 E-Field and Temperature measurements at 900MHz [7]

Figure 4.2 E-Field and temperature measurements at 1.9GHz [7]

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	Æ.	<b>Reviewed by:</b> Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 6 of 28



## 5. PHANTOM & EQUIVALENT TISSUES



Figure 5.1 SAM Twin Phantom



Figure 5.2 Simulated Tissue

### SAM Phantom

The SAM Twin Phantom V4.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users [11][12]. 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 the 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 in the robot. (see Fig. 5.1)

## **Brain & Muscle Simulating Mixture Characterization**

The brain and muscle mixtures consist of a viscous gel using hydroxethylcellullose (HEC) gelling agent and saline solution (see Table 6.1). Preservation with a bacteriacide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 have been incorporated in the following table. Other head and body tissue parameters that have not bee specified in P1528 are derived from the issue dielectric parameters computed from the 4-Cole-Cole equations The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrove [13].(see Fig. 5.2)

Table 5.1 Composition of the Brain & Muscle Tissue Equivalent Matter

Ingredient	Frequency (MHz)									
(% by weight)	45	50	83	35	9	15	19	00	24	50
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	58.55	73.2
Salt (NAC1)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.11	0.4
Sugar	56.32	46.78	56.0	45.0	56.0	41.76	0.0	58.0	0.0	.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bacteride	0.19	0.05	0.1	0.1	0.27	0.0	0.1	0.0	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.38	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7

### **Device Holder for Transmitters**



Figure 5.2 Mounting Device

In combination with the SAM Twin Phantom V4.0, the Mounting Device (see Fig. 5.2) enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation point is the ear opening. The devices can be easily, accurately, and repeatably be positioned according to the FCC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

\* Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations [12]. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 7 of 28



## 6. TEST SYSTEM SPECIFICATIONS

## **Automated Test System Specifications**

**Positioner** 

Robot: Stäubli Unimation Corp. Robot Model: RX60L

Repeatability: 0.02 mm

No. of axis: 6

#### **Data Acquisition Electronic (DAE) System**

**Cell Controller** 

**Processor:** Pentium 4

Clock Speed: 2.53 GHz

Operating System: Windows XP Professional

**Data Converter** 

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

Figure 6.1 DASY4 Test System

**Software**: DASY4 software

**Connecting Lines:** Optical downlink for data and status info.

Optical uplink for commands and clock

PC Interface Card

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

Link to DAE4

16 bit A/D converter for surface detection system

serial link to robot

direct emergency stop output for robot

**E-Field Probes** 

**Model:** EX3DV4 S/N: 3550

**Construction:** Triangular core **Frequency:** 10 MHz to 6 GHz

Linearity:  $\pm$  0.2 dB (30 MHz to 6 GHz)

**Phantom** 

**Phantom:** SAM Twin Phantom (V4.0)

Shell Material:VIVAC CompositeThickness: $2.0 \pm 0.2 \text{ mm}$ 

PCTESTÔ SAR & RSS-102 TEST REPORT	NPC1	FCC/ IC Measurement Report	IBI		Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter		IC ID: 349E-WM3B22BG	Page 8 of 28



## 7. DOSIMETRIC ASSESSMENT & PHANTOM SPECS

### **Measurement Procedure**

The evaluation was performed using the following procedure:

- 1. The SAR measurement was taken at a selected spatial reference point to monitor power variations during testing. This fixed location point was measured and used as a reference value.
- 2. The SAR distribution at the exposed side of the head was measured at a distance of 3.9mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm x 15mm.
- 3. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation. Around this point, a volume of 32mm x 32mm x 34mm (fine resolution volume scan, zoom scan) was assessed by measuring 7 x 7 x 7 points. On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see Fig. 7.1):
- a. The data at the surface was extrapolated, since the center of the dipoles is 2.7mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. The extrapolation was based on a least square algorithm [15]. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
- b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were 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 directions) [15][16]. The volume was integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
- c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
- 4. The SAR reference value, at the same location as procedure #1, was re-measured. If the value changed by more than 5%, the evaluation is repeated.



## Specific Anthropomorphic Mannequin (SAM) Specifications

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90<sup>th</sup> percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. 7.2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.



Figure 7.2 SAM Twin Phantom shell

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 9 of 28



Figure 7.1 Sample SAR Area Scan



## ANSI/IEEE C95.1 - 1992 RF EXPOSURE LIMITS

### **Uncontrolled Environment**

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

### **Controlled Environment**

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 10.1. Safety Limits for Partial Body Exposure [2]

	HUMAN EXPOSURE LIMITS	
	UNCONTROLLED ENVIRONMENT	CONTROLLED ENVIRONMENT
	General Population	General Population
	(W/kg) or (mW/g)	(W/kg) or (mW/g)
SPATIAL PEAK SAR 1	1.60	8.00
Brain	1.00	0.00
SPATIAL AVERAGE SAR 2	0.08	0.40
Whole Body	0.00	5.40
SPATIAL PEAK SAR 3	4.00	20.00
Hands, Feet, Ankles, Wrists	1.00	25.00

<sup>3</sup> The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	<b>Reviewed by:</b> Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 10 of 28

<sup>1</sup> The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

<sup>2</sup> The Spatial Average value of the SAR averaged over the whole body.



# 9. MEASUREMENT UNCERTAINTIES

a	b	С	d	e=	f	g	h =	i =	k
				f(d,k)			cxf/e	cxg/e	
Uncertainty		Tol.	Prob.		C <sub>i</sub>	C <sub>i</sub>	1 - g	10 - g	
Component	Sec.	(± %)	Dist.	Div.	(1 - g)	(10 - g)	u <sub>i</sub>	u <sub>i</sub>	Vi
· ·		, ,			, 3,	. 3	(± %)	(± %)	
Measurement System									
Probe Calibration	E1.1	4.8	N	1	1	1	4.8	4.8	$\infty$
Axial Isotropy	E1.2	4.7	R	√3	0.7	0.7	1.9	1.9	$\infty$
Hemishperical Isotropy	E1.2	9.6	R	√3	0.7	0.7	3.9	3.9	$\infty$
Boundary Effect	E1.3	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	$\infty$
Linearity	E1.4	4.7	R	√3	1	1	2.7	2.7	$\infty$
System Detection Limits	E1.5	1.0	R	$\sqrt{3}$	1	1	0.6	0.6	$\infty$
Readout Electronics	E1.6	1.0	Ν	1	1	1	1.0	1.0	$\infty$
Response Time	E1.7	0.8	R	√3	1	1	0.5	0.5	$\infty$
Integration Time	E1.8	2.6	R	$\sqrt{3}$	1	1	1.5	1.5	$\infty$
RF Ambient Conditions	E5.1	3.0	R	$\sqrt{3}$	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E5.2	0.4	R	√3	1	1	0.2	0.2	$\infty$
Probe Positioning w/ respect to Phantom	E5.3	2.9	R	$\sqrt{3}$	1	1	1.7	1.7	$\infty$
Extrapolation, Interpolation & Integration	E4.2	1.0	R	√3	1	1	0.6	0.6	∞
Algorithms for Max. SAR Evaluation									
Test Sample Related									
Test Sample Positioning	E3.2.1	2.9	Ν	1	1	1	2.9	2.9	145
Device Holder Uncertainty	E3.1.1	3.6	Ν	1	1	1	3.6	3.6	5
Output Power Variation - SAR drift	5.6.2	5.0	R	$\sqrt{3}$	1	1	2.9	2.9	∞
measurement									
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness	E2.1	4.0	R	$\sqrt{3}$	1	1	2.3	2.3	∞
tolerances)									
Liquid Conductivity - deviation from	E2.2	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2	$\infty$
target values									
Liquid Conductivity - measurement	E2.2	2.5	Ν	1	0.64	0.43	1.6	1.1	$\infty$
uncertainty									
Liquid Permittivity - deviation from	E2.2	5.0	R	$\sqrt{3}$	0.6	0.5	1.7	1.4	∞
target values									
Liquid Permittivity - measurement	E2.2	2.5	Ν	1	0.6	0.5	1.5	1.2	∞
uncertainty									
Combined Standard Uncertainty (k=1)			RSS				10.3	10.0	
Expanded Uncertainty (k=2)							20.6	20.1	
(95% CONFIDENCE LEVEL)									

The above measurement uncertainties are according to IEEE Std. 1528 - 2003.

PCTESTÔ SAR & RSS-102 TEST REPORT	PCI	FCC/ IC Measurement Report	IBI	√L.	Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 11 of 28



# 10. SAR TEST DATA SUMMARY

# See Measurement Result Data Pages

## **Procedures Used To Establish Test Signal**

The device was placed into continuous transmit mode in WLAN mode, using software test codes. Such test signals offer a consistent means for testing SAR and are recommended for evaluating SAR [4].

### **Device Test Conditions**

The device was powered through the battery. In order to verify that the device was tested at full power, conducted output power measurements were performed before the evaluation at the maximum power set on the base station simulator to confirm the output power. If a power deviation of more than 5% occurred, the test was repeated.

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	Æ.	<b>Reviewed by:</b> Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 12 of 28



# 11. SAR TEST EQUIPMENT

# **Equipment Calibration**

**Table 13.1 Test Equipment Calibration** 

EQUIPMENT SPECIFICATIONS								
Туре		Calibration Date	Serial Number					
Stäubli Robot RX60L		February 2005	599131-01					
Stäubli Robot Controller		February 2005	PCT592					
Stäubli Teach Pendant (Joystick)		February 2005	3323-00161					
Micron Computer		February 2005	PCT577					
SPEAG EDC3		February 2005	321					
SPEAG DAE4		September 2005	637					
SPEAG E-Field Probe EX3DV4		October 2005	3550					
SPEAG Dummy Probe		February 2005	PCT583					
SPEAG SAM Twin Phantom V4.0		February 2005	PCT666					
SPEAG Light Alignment Sensor		February 2005	205					
PCTEST Validation Dipole D300V2		September 2005	PCT301					
SPEAG Validation Dipole D835V2		January 2005	PCT512					
SPEAG Validation Dipole D1900V2		January 2005	PCT613					
Brain Equivalent Matter (300MHz)		January 2005	PCTBEM601					
Brain Equivalent Matter (835MHz)		January 2005	PCTBEM101					
Brain Equivalent Matter (1900MHz)		January 2005	PCTBEM301					
Muscle Equivalent Matter (300MHz)		January 2005	PCTMEM701					
Muscle Equivalent Matter (835MHz)		January 2005	PCTMEM201					
Muscle Equivalent Matter (1900MHz)		January 2005	PCTMEM401					
Microwave Amp. Model: 5S1G4, (800	MHz - 4.2GHz)	January 2005	22332					
Gigatronics 8651A Power Meter		January 2005	1835299					
HP-8648D (9kHz ~ 4GHz) Signal (	Generator	January 2005	PCT530					
Amplifier Research 5S1G4 Power A	Amp	January 2005	PCT540					
HP-8753E (30kHz ~ 3GHz) Netwo	rk Analyzer	January 2005	PCT552					
HP85070B Dielectric Probe Kit		January 2005	PCT501					
Ambient Noise/Reflection, etc.	<12mW/kg/<3%of SAR	January 2005	Anechoic Room PCT01					

#### NOTE:

Dipole Validation measurement was performed by PCTEST Lab before each test. The brain simulating material is calibrated by PCTEST using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the brain-equivalent material.

PCTESTÔ SAR & RSS-102 TEST REPORT	<u> </u>	FCC/ IC Measurement Report	IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 13 of 28



## 12. CONCLUSION

### **Measurement Conclusion**

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC and Industry Canada. These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.[3]

PCTESTÔ SAR & RSS-102 TEST REPORT	<u>■\PC</u>	FCC/ IC Measurement Report	IBI	Æ.	<b>Reviewed by:</b> Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 14 of 28



## 13. REFERENCES

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.
- [2] ANSI/IEEE C95.1 1991, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 300kHz to 100GHz, New York: IEEE, Aug. 1992.
- [3] ANSI/IEEE C95.3 1991, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields RF and Microwave, New York: IEEE, 1992.
- [4] Federal Communications Commission, OET Bulletin 65 (Edition 97-01), Supplement C (Edition 01-01), Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, July 2001.
- [5] IEEE Standards Coordinating Committee 34 IEEE Std. 1528-2003), *Draft Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Body Due to Wireless Communications Devices: Experimental Techniques.*
- [6] NCRP, National Council on Radiation Protection and Measurements, *Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields*, NCRP Report No. 86, 1986. Reprinted Feb. 1995.
- [7] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, *The Dependence of EM Energy Absorption upon Human Head Modeling at 900 MHz*, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.
- [8] N. Kuster and Q. Balzano, Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.
- [9] G. Hartsgrove, A. Kraszewski, A. Surowiec, *Simulated Biological Materials for Electromagnetic Radiation Absorption Studies*, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.
- [10] Q. Balzano, O. Garay, T. Manning Jr., *Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones*, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.
- [11] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, *Numerical Recepies in C*, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.
- [12] Federal Communications Commission, OET Bulletin 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. Supplement C, Dec. 1997.
- [13] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields High-frequency: 10kHz-300GHz, Jan. 1995.

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	<b>Reviewed by:</b> Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 15 of 28



# **EXHIBIT A. SYSTEM VERIFICATION**

## **Tissue Verification**

**Table A.1 Simulated Tissue Verification** 

MEASURED TISSUE PARAMETERS								
		2450N	ИНz Brain	2450N	ЛНz Muscle			
		Target	Measured	Target	Measured			
Dielectric Constant: ε		39.20	39.27	52.70	50.78			
Conductivity: σ		1.80	1.85	1.95	1.86			

# **Test System Validation**

Prior to assessment, the system is verified to the  $\pm 10\%$  of the specifications at 2450 MHz by using the system validation kits. (Graphic Plots Attached)

**Table A.2 System Validation** 

System Validation TARGET & MEASURED									
Date:	Amb. Temp (℃)	Liquid Temp(℃)	Input Power (W)	Tissue	Targeted SAR <sub>1g</sub> (mW/g)	Measured SAR <sub>1g</sub> (mW/g)	Deviation (%)		
01/06/05	22.3	20.2				5.07	-3.20%		
01/07/05	22.7	20.6	0.100	2450 MHz	5.24	4.94	-5.70%		
01/11/05	22.4	20.5	0.100	Brain	3.24	4.78	-8.70%		
01/12/05	22.8	20.6					5.47	4.30%	

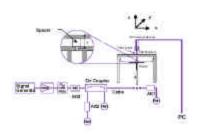




Figure A.0 Dipole Validation Test Setup

PCTESTÔ SAR & RSS-102 TEST REPORT	PC	FCC/ IC Measurement Report	IBI	<b>Reviewed by:</b> Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 16 of 28



# **EXHIBIT A. SAR DATA SUMMARY**

Mixture Type: 2450MHz Muscle

A.1 I	VIEA	SUREME	NT R	ESUL	TS (IE	EE 802	.11b, Table	t, LCD	Flip)	
FREQUE	NCY	Modulation	POV	WER	Data Rate Antenna E	Separation Distance (cm)	Test Position	Bluetooth	SAR	
MHz	Ch.		Start	End	(MBps)		##	POSITION		(W/kg)
2437	6	DSSS	16.78	16.79	1	Main	0.0 cm	LCD Side	OFF	0.506
2437	6	DSSS	16.40	16.38	2	Main	0.0 cm	LCD Side	OFF	0.457
2437	6	DSSS	15.91	15.91	5.5	Main	0.0 cm	LCD Side	OFF	0.441
2437	6	DSSS	15.20	15.28	11	Main	0.0 cm	LCD Side	OFF	0.349
2412	1	DSSS	17.18	17.29	1	Main	0.0 cm	LCD Side	OFF	0.539
2462	11	DSSS	16.44	16.66	1	Main	0.0 cm	LCD Side	OFF	0.477
2412	1	DSSS	17.18	17.17	1	Main	0.0 cm	LCD Side	ON	0.532
2412	1	DSSS	17.26	17.24	1	Aux	0.0 cm	LCD Side	OFF	0.892
2437	6	DSSS	16.68	16.65	1	Aux	0.0 cm	LCD Side	OFF	0.806
2462	11	DSSS	16.43	16.41	1	Aux	0.0 cm	LCD Side	OFF	0.785
2412	1	DSSS	17.26	17.20	1	Aux	0.0 cm	LCD Side	ON	0.882
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population							Musc .6 W/kg ( averaged ove	(mW/g)	

#### **NOTES:**

- The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.

3.	SAR Measurement System	X	DASY4		IDX		
	Phantom Configuration		Left Head	X	Flat Phantom		Right Head
١.	SAR Configuration		Head	X	Body		Hand
5.	Test Signal Call Mode	X	Manu. Test Codes		Base Station Simula	tor	

- 7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian
Vice President Engineering



Figure A.1.1 Body SAR Test Setup
-- Tablet, LCD Flip -(Aux Antenna)



Figure A.1.2 Body SAR Test Setup
-- Tablet, LCD Flip -(Main Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	- NPC	FCC/ IC Measurement Report	IBI	VI.	Reviewed by: Quality Manager
SAR Filename:		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model:	FCC ID:	IC ID:	Page 17 of 28
SAR.0501050004-R3.ANO	Jan. 6-12, 2005	1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	ANO20040501CX2	349E-WM3B22BG	1 age 17 01 20



Mixture Type: 2450MHz Muscle

<b>A.2</b>	A.2 MEASUREMENT RESULTS (IEEE 802.11b, Laptop, LCD Flip)													
FREQUENCY			POWER		Data Rate			Separation	Test	SAR				
MHz	Ch.	Modulation	Start	End	(MBps)	Antenna	Bluetooth	Distance (cm)	Position	(W/kg)				
2437	6	DSSS	16.78	16.71	1	Main	OFF	0.0 cm	Laptop	0.025				
2437	6	DSSS	16.78	16.73	1	Main	ON	0.0 cm	Laptop	0.026				
2437	6	DSSS	16.68	16.87	1	Aux	OFF	0.0 cm	Laptop	0.022				
2437	6	DSSS	16.68	16.78	1	Aux	ON	0.0 cm	Laptop	0.023				
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  1.6 W/kg (mW/g)													

#### **NOTES:**

- The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- All modes of operation were investigated, and worst-case results are reported. 2.

**Uncontrolled Exposure/General Population** 

3.	SAR Measurement System	X	DASY4		IDX		
	Phantom Configuration		Left Head	X	Flat Phantom		Right Head
4.	SAR Configuration		Head	X	Body		Hand
5.	Test Signal Call Mode	X	Manu. Test Codes		Base Station Simula	itor	

- Tissue parameters and temperatures are listed on the SAR plots. 6.
- 7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian

Vice President Engineering

Figure A.2.1 Body SAR Test Setup -- Laptop Position, LCD Flip --(Main Antenna)



averaged over 1 gram

Figure A.2.2 Body SAR Test Setup -- Laptop Position, LCD Flip --(Aux Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	PCI	FCC/ IC Measurement Report	IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 18 of 28



Mixture Type: 2450MHz Muscle

A.3 N	A.3 MEASUREMENT RESULTS (IEEE 802.11b, Bystander, LCD Open)													
FREQUENCY		Modulation	n POWER		Data Rate Antenna I		Bluetooth	Separation Distance (cm)	Position	SAR				
MHz	Ch.		Start	End	(MBps)			##		(W/kg)				
2437	6	DSSS	16.78	16.61	1	Main	OFF	1.5 cm	Bystander	0.101				
2437	6	DSSS	16.78	16.98	1	Main	ON	1.5 cm	Bystander	0.107				
2437	6	DSSS	16.68	16.64	1	Aux	OFF	1.5 cm	Bystander	0.069				
2437	6	DSSS	16.68	16.85	1	Aux	ON	1.5 cm	Bystander	0.067				

ANSI / IEEE C95.1 1992 - SAFETY LIMIT **Spatial Peak Uncontrolled Exposure/General Population** 

Muscle 1.6 W/kg (mW/g)

averaged over 1 gram

#### **NOTES:**

- The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- All modes of operation were investigated, and worst-case results are reported. 2.

3	SAR Measurement Sy	ıstam	IXI	DASY4		IDX
ა.	SAR ivieasurement sy	/stem		DA314	ш	IDA

**Phantom Configuration** Left Head Flat Phantom Right Head **SAR** Configuration Head Body Hand 4.

Test Signal Call Mode Manu. Test Codes □ **Base Station Simulator** 

6. Tissue parameters and temperatures are listed on the SAR plots.

Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Vice President Engineering

Figure A.3.1 Body SAR Test Setup -- Bystander Position, LCD Open --(Main Antenna)

Figure A.3.2 Body SAR Test Setup -- Bystander Position, LCD Open --(Aux Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	PCI	FCC/ IC Measurement Report	IBI	√L.	Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 19 of 28



## **EXHIBIT A. SAR DATA SUMMARY**

Mixture Type: 2450MHz Muscle

A.4 I	VIEA	SUREME	NT R	ESUI	LTS (II	EEE 802	.11b, Tablet	, LCD FI	ip)	
FREQUE	NCY	Modulation	POWER		Data Rate	Antenna	Separation Distance (cm) <sup>‡‡</sup>	Test Position*	Bluetooth	SAR
MHz	Ch.		Start	End	(MBps)		Distance (citi)	rosition		(W/kg)
2412	1	DSSS	17.18	17.42	1	Main	0.0 cm	Top Side	OFF	1.010
2437	6	DSSS	16.78	16.65	1	Main	0.0 cm	Top Side	OFF	0.885
2462	11	DSSS	16.44	16.64	1	Main	0.0 cm	Top Side	OFF	0.820
2412	1	DSSS	17.18	17.33	1	Main	0.0 cm	Top Side	ON	1.010
2437	6	DSSS	16.78	16.95	1	Main	0.0 cm	<b>Bottom Side</b>	ON	0.059
2437	6	DSSS	16.78	16.84	1	Main	0.0 cm	Left Side	ON	0.064
2412	1	DSSS	17.26	17.43	1	Aux	0.0 cm	Right Side	OFF	0.621
2437	6	DSSS	16.68	16.88	1	Aux	0.0 cm	Right Side	OFF	0.528
2462	11	DSSS	16.43	16.63	1	Aux	0.0 cm	Right Side	OFF	0.507
2437	6	DSSS	16.68	16.91	1	Aux	0.0 cm	Right Side	ON	0.618
2437	6	DSSS	16.68	16.87	1	Aux	0.0 cm	Bottom Side	ON	0.057
2437	6	DSSS	16.68	16.84	0.0 cm	Left Side	ON	0.062		
		/ IEEE C95.1 Spa atrolled Expos	tial Pea	ık		Muscle .6 W/kg (mV averaged over 1 g				

#### **NOTES:**

- The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.
- 3. **SAR** Measurement System DASY4 IDX
- Phantom Configuration Left Head X Flat Phantom Right Head Head Hand 4. **SAR** Configuration Body
- X Test Signal Call Mode Manu. Test Codes **Base Station Simulator**
- Tissue parameters and temperatures are listed on the SAR plots. 6.
- 7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1
- \* Front View 8.





Figure A.4.2 Body SAR Test Setup -- Tablet, LCD Flip --(Top Side)



Figure A.4.3 Body SAR Test Setup -- Tablet, LCD Flip --(Bottom Side)



Figure A.4.4 Body SAR Test Setup -- Tablet, LCD Flip --(Right Side)



Figure A.4.5 Body SAR Test Setup -- Tablet, LCD Flip --(Left Side)

PCTESTÔ SAR & RSS-102 TEST REPORT	<u> </u>	FCC/ IC Measurement Report	IBI	√L.	Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 20 of 28



# **EXHIBIT A. SAR DATA SUMMARY**

Mixture Type: 2450MHz Muscle

A.5	ΜEA	SUREME	NT R	ESUL	TS (II	EEE 80	2.11g, Tab	let, LCD	Flip)	
FREQUE	NCY	Modulation	POV	VER	Data Rate	Antenna	Separation Distance (cm)	Test Position	Bluetooth	SAR
MHz	Ch.		Start	End	(MBps)		##	rosition		(W/kg)
2437	6	OFDM	13.06	13.15	6	Main	0.0 cm	LCD Side	OFF	0.211
2437	6	OFDM	12.87	12.92	9	Main	0.0 cm	LCD Side	OFF	0.203
2437	6	OFDM	12.75	12.71	12	Main	0.0 cm	LCD Side	OFF	0.198
2437	6	OFDM	12.44	12.45	18	Main	0.0 cm	LCD Side	OFF	0.182
2437	6	OFDM	12.12	12.21	24	Main	0.0 cm	LCD Side	OFF	0.170
2437	6	OFDM	11.61	11.65	36	Main	0.0 cm	LCD Side	OFF	0.151
2437	6	OFDM	11.21	11.29	48	Main	0.0 cm	LCD Side	OFF	0.139
2437	6	OFDM	11.00	11.05	54	Main	0.0 cm	LCD Side	OFF	0.133
2412	1	OFDM	12.35	12.36	6	Main	0.0 cm	LCD Side	OFF	0.165
2462	11	OFDM	11.69	11.72	6	Main	0.0 cm	LCD Side	OFF	0.164
2437	6	OFDM	11.00	10.97	6	Main	0.0 cm	LCD Side	ON	0.204
2437	6	OFDM	12.96	12.91	6	Aux	0.0 cm	LCD Side	OFF	0.519
2437	6	OFDM	12.96	12.79	Aux	0.0 cm	LCD Side	ON	0.513	
		/ IEEE C95.1 Spat rolled Expos	ial Peak		Muscle .6 W/kg (m averaged over 1	nW/g)				

#### **NOTES:**

- 1. The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.

B. SAR Measurement System 
☐ DASY4 ☐ IDX

Phantom Configuration ☐ Left Head ☒ Flat Phantom ☐ Right Head

4. SAR Configuration ☐ Head ☒ Body ☐ Hand

5. Test Signal Call Mode 

☑ Manu. Test Codes □ Base Station Simulator

6. Tissue parameters and temperatures are listed on the SAR plots.

7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian

Vice President Engineering



Figure A.5.1 Body SAR Test Setup
-- Tablet Position, LCD Flip -(Aux Antenna)



Figure A.5.2 Body SAR Test Setup
-- Tablet Position, LCD Flip -(Aux Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	PCI	FCC/ IC Measurement Report	IBI	Æ.	Reviewed by: Quality Manager
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 21 of 28



Mixture Type: 2450MHz Muscle

A.6	A.6 MEASUREMENT RESULTS (IEEE 802.11g, Laptop, LCD Flip)											
FREQU	ENCY		PO\	VER	Data Rate			_	Separation		SAR	
MHz	Ch.	Modulation	Start	End	(MBps)	Antenna	Blueto	ooth	Distance (cm)	Position	(W/kg)	
2437	6	OFDM	13.60	12.93	6	Main	OF	F	0.0 cm	Laptop	0.012	
2437	6	OFDM	13.06	13.17	6	Main	10	1	0.0 cm	Laptop	0.012	
2437	6	OFDM	12.96	13.15	6	Aux	OF	F	0.0 cm	Laptop	0.013	
2437	6	OFDM	12.96	13.09	6	Aux	10	N 0.0 cm Laptop 0.013			0.013	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT  Spatial Peak  1.6 W/kg (mW/g)											

#### **NOTES:**

- 1. The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.

**Uncontrolled Exposure/General Population** 

3.	SAR Measurement System	X	DASY4		IDX		
	Phantom Configuration		Left Head	X	Flat Phantom		Right Head
4.	SAR Configuration		Head	X	Body		Hand
5.	Test Signal Call Mode	X	Manu. Test Codes		Base Station Simula	tor	

- 6. Tissue parameters and temperatures are listed on the SAR plots.
- 7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian
Vice President Engineering



Figure A.6.1 Body SAR Test Setup
-- Laptop Position, LCD Flip -(Main Antenna)



averaged over 1 gram

Figure A.6.2 Body SAR Test Setup
-- Laptop Position, LCD Flip -(Aux Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 22 of 28



Mixture Type: 2450MHz Muscle

A.7 N	A.7 MEASUREMENT RESULTS (IEEE 802.11g, Bystander, LCD Open)											
FREQU	ENCY	Modulation	PO\	NER	Data Rate	Antenna	Bluetooth	Separation Distance (cm)	Position	SAR		
MHz	Ch.		Start	End	(MBps)			##		(W/kg)		
2437	6	OFDM	13.06	12.91	6	Main	OFF	1.5 cm	Bystander	0.048		
2437	6	OFDM	13.06	13.23	6	Main	ON	1.5 cm	Bystander	0.048		
2437	6	OFDM	12.96	12.74	6	Aux	OFF	1.5 cm	Bystander	0.033		
2437	6	OFDM	12.96	13.15	6	Aux	ON	1.5 cm	Bystander	0.033		

ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population

Muscle
1.6 W/kg (mW/g)
averaged over 1 gram

#### **NOTES:**

- 1. The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- 2. All modes of operation were investigated, and worst-case results are reported.

2	SAD Mossuroment System	[X]	DASY4	П	IDX
ა.	SAR Measurement System		DA314		IDV

Phantom Configuration ☐ Left Head ☒ Flat Phantom ☐ Right Head

4. SAR Configuration ☐ Head ☒ Body ☐ Hand

5. Test Signal Call Mode 

☑ Manu. Test Codes □ Base Station Simulator

6. Tissue parameters and temperatures are listed on the SAR plots.

7. Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian
Vice President Engineering



Figure A.7.1 Body SAR Test Setup
-- Bystander Position, LCD Open -(Main Antenna)



Figure A.7.2 Body SAR Test Setup
-- Bystander Position, LCD Open -(Aux Antenna)

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR,0501050004-R3,ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 23 of 28



2450MHz Muscle Mixture Type:

A.8 N	A.8 MEASUREMENT RESULTS (IEEE 802.11g, Tablet, LCD Flip)												
FREQUI	ENCY	Modulation	PO	NER	Data Rate	Antenna	Bluetooth	Separation Distance (cm)	Position	SAR			
MHz	Ch.		Start	End	(MBps)			##		(W/kg)			
2437	6	OFDM	13.06	13.24	6	Main	OFF	0.0 cm	Top Side	0.390			
2437	6	OFDM	13.06	13.25	6	Main	ON	0.0 cm	Top Side	0.388			
2437	6	OFDM	13.06	13.29	6	Main	ON	0.0 cm	Bottom Side	0.057			
2437	6	OFDM	13.06	13.20	6	Main	ON	0.0 cm	Left Side	0.065			
2437	6	OFDM	12.96	13.16	6	Aux	OFF	0.0 cm	Right Side	0.238			
2437	6	OFDM	12.96	13.17	6	Aux	ON	0.0 cm	Right Side	0.230			
2437	6	OFDM	12.96	13.18	6	Aux	ON	0.0 cm	Bottom Side	0.057			
2437	6	OFDM	12.96	13.15	6	Aux	ON	0.0 cm	Left Side	0.061			

ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak **Uncontrolled Exposure/General Population** 

Muscle 1.6 W/kg (mW/g) averaged over 1 gram

#### **NOTES:**

- The test data reported are the worst-case SAR value with the lap held position set in a typical configuration. Test procedures used are according to FCC/OET Bulletin 65, Supp.C [July 2001].
- All modes of operation were investigated, and worst-case results are reported. 2.

**SAR Measurement System** 

Phantom Configuration

☑ DASY4

☑ Flat Phantom

Right Head

4. SAR Configuration Head

 $\boxtimes$ Body Hand

Left Head

Test Signal Call Mode

**Base Station Simulator** 

Tissue parameters and temperatures are listed on the SAR plots.

Liquid tissue depth is 15.1 cm.  $\pm$  0.1

Alfred Cirwithian Vice President Engineering



Figure A.8.1 Body SAR Test Setup -- Tablet Position, LCD Flip --(Top Side)



Figure A.8.2 Body SAR Test Setup -- Tablet Position, LCD Flip --(Bottom Side)



Figure A.8.3 Body SAR Test Setup -- Tablet Position, LCD Flip --(Right Side)



Figure A.8.4 Body SAR Test Setup -- Tablet Position, LCD Flip --(Left Side)

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 24 of 28



## **ATTACHMENT A - SAR TEST DATA**

PCTESTÔ SAR & RSS-102 TEST REPORT		FCC/ IC Measurement Report	IBI	Reviewed by: Quality Manager	
SAR Filename:		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model:	FCC ID:	IC ID:	Page 25 of 28
SAR.0501050004-R3.ANO	Jan. 6-12, 2005	1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	ANO20040501CX2	349E-WM3B22BG	1 agc 23 01 20

### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11b; Frequency: 2412 MHz; Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-06-2005; Ambient Temp: 22.6°C; Tissue Temp: 20.7°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

### Tablet position, LCD Side, ch.01, 1Mbps, Aux antenna, Bluetooth off

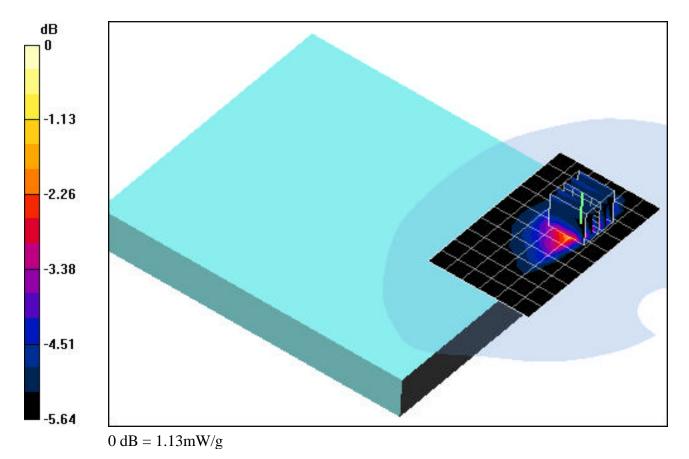
Area Scan (7x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 18.3 V/m

Peak SAR (extrapolated) = 2.02 W/kg

SAR(1 g) = 0.892 mW/g; SAR(10 g) = 0.549 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11b; Frequency: 2437 MHz;Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-06-2005; Ambient Temp: 22.6°C; Tissue Temp: 20.7°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

### Laptop Position, LCD Flip, ch.06, 1Mbps, Main antenna, Bluetooth on

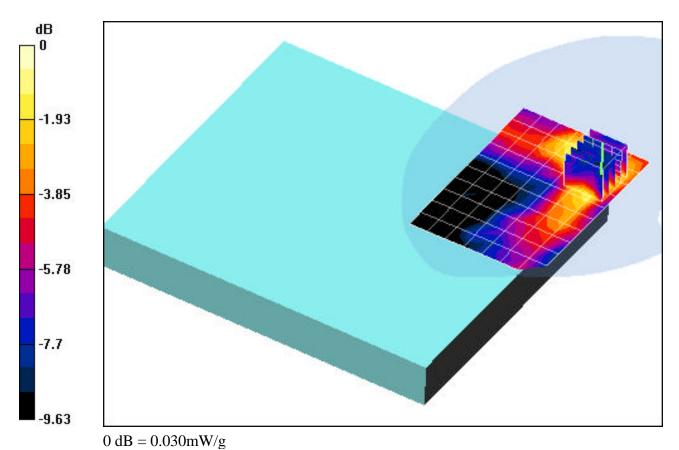
Area Scan (8x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.39 V/m

Peak SAR (extrapolated) = 0.045 W/kg

SAR(1 g) = 0.026 mW/g; SAR(10 g) = 0.016 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11b; Frequency: 2437 MHz; Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.5 cm

Test Date: 01-07-2005; Ambient Temp: 23.3°C; Tissue Temp: 21.0°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

### Bystander position, LCD Open, ch.06, 1Mbps, Main antenna, Bluetooth on

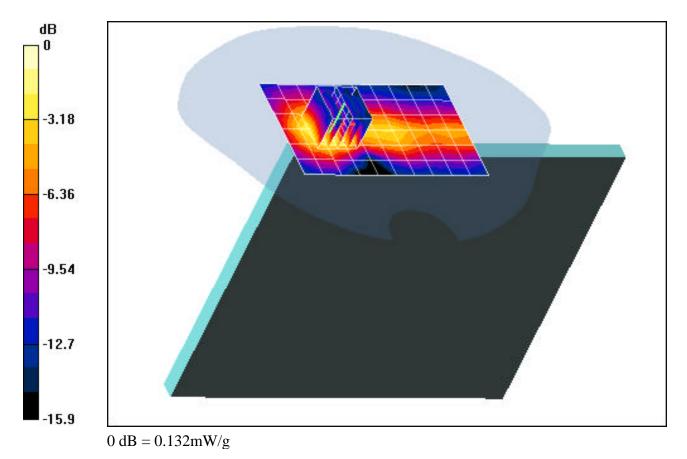
Area Scan (7x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 5.43 V/m

Peak SAR (extrapolated) = 0.197 W/kg

SAR(1 g) = 0.107 mW/g; SAR(10 g) = 0.058 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11b; Frequency: 2412 MHz; Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-11-2005; Ambient Temp: 22.7°C; Tissue Temp: 20.2°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

## Tablet position, Top side, LCD Flip, ch.01, 1Mbps, Main antenna, Bluetooth off

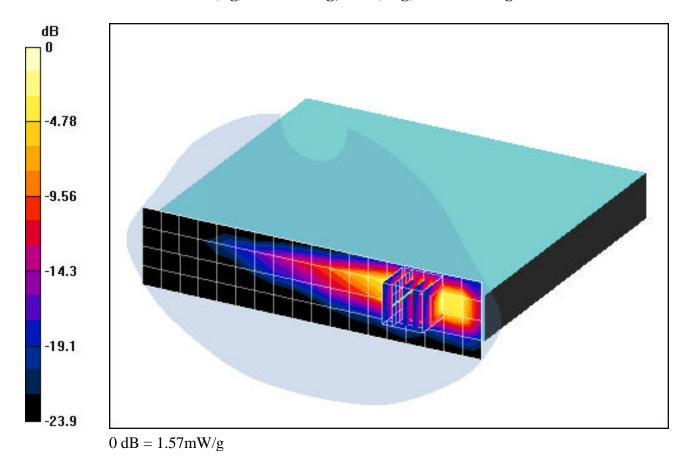
Area Scan (5x19x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 6.65 V/m

Peak SAR (extrapolated) = 2.63 W/kg

SAR(1 g) = 1.01 mW/g; SAR(10 g) = 0.421 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11g; Frequency: 2437 MHz;Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-06-2005; Ambient Temp: 22.6°C; Tissue Temp: 20.7°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

## Tablet position, LCD Side, ch.06, 6Mbps, Aux antenna, Bluetooth off

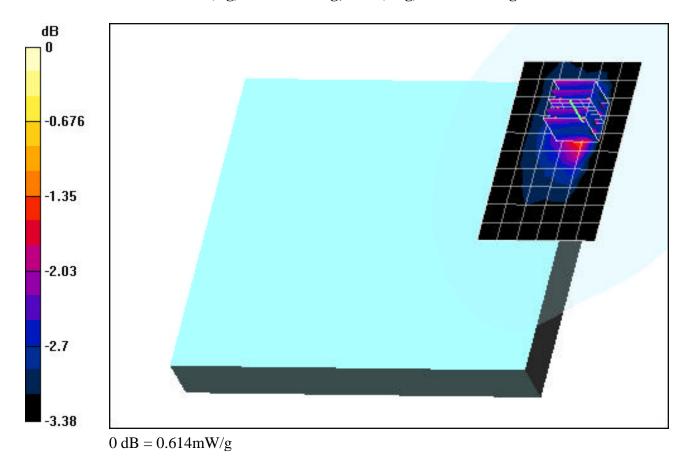
Area Scan (7x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 15.1 V/m

Peak SAR (extrapolated) = 0.981 W/kg

SAR(1 g) = 0.519 mW/g; SAR(10 g) = 0.393 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11g; Frequency: 2437 MHz; Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-07-2005; Ambient Temp: 23.3°C; Tissue Temp: 21.0°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

## Laptop Position, LCD Flip, ch.06, 6Mbps, Aux antenna, Bluetooth off

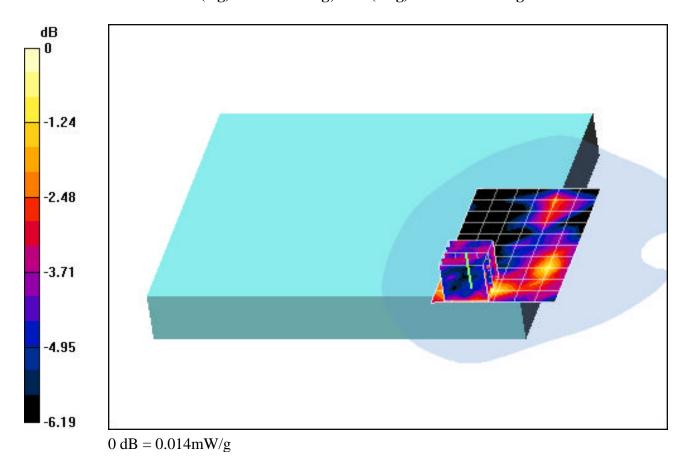
Area Scan (7x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 1.45 V/m

Peak SAR (extrapolated) = 0.090 W/kg

SAR(1 g) = 0.013 mW/g; SAR(10 g) = 0.00827 mW/g



### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11g; Frequency: 2437 MHz;Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.5 cm

Test Date: 01-07-2005; Ambient Temp: 23.3°C; Tissue Temp: 21.0°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

### Bystander position, LCD Open, ch.06, 6Mbps, Main antenna, Bluetooth off

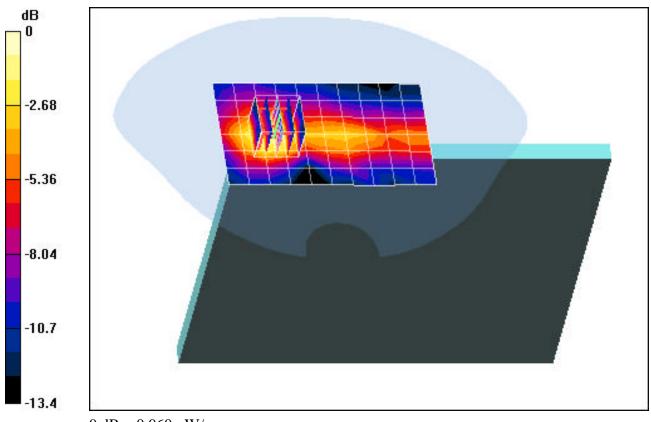
Area Scan (7x11x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.78 V/m

Peak SAR (extrapolated) = 0.092 W/kg

SAR(1 g) = 0.048 mW/g; SAR(10 g) = 0.027 mW/g



0 dB = 0.060 mW/g

### DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11g; Frequency: 2437 MHz; Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-11-2005; Ambient Temp: 22.7°C; Tissue Temp: 20.2°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

### Tablet position, Top side, ch.06, 6Mbps, Main antenna, Bluetooth off

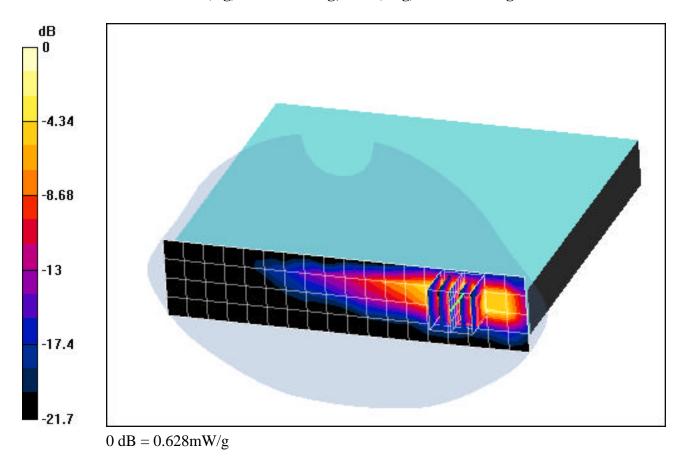
Area Scan (5x19x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.85 V/m

Peak SAR (extrapolated) = 1.08 W/kg

SAR(1 g) = 0.390 mW/g; SAR(10 g) = 0.162 mW/g



DUT: WM3B2200BG; Type: IBM 802.11b/g WLAN Adapter; Serial: 006FA0473ADC55371003

Communication System: IEEE 802.11b; Frequency: 2412 MHz;Duty Cycle: 1:1 Medium: 2450 Muscle ( $\sigma$  = 1.90 mho/m,  $\epsilon_r$  = 53.31,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 0.0cm

Test Date: 01-11-2005; Ambient Temp: 22.7°C; Tissue Temp: 20.2°C

Probe: EX3DV4 - SN3550; ConvF(6.27, 6.27, 6.27); Calibrated: 10/26/2004

Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

## Tablet position, Top side, LCD Flip, ch.01, 1Mbps, Main antenna, Bluetooth off

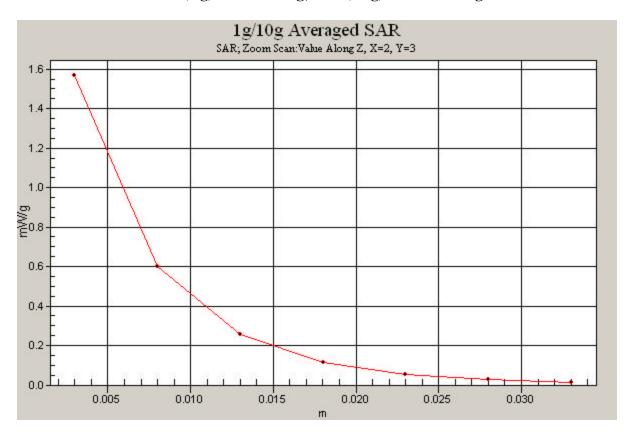
Area Scan (5x19x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 6.65 V/m

Peak SAR (extrapolated) = 2.63 W/kg

SAR(1 g) = 1.01 mW/g; SAR(10 g) = 0.421 mW/g





# ATTACHMENT B – SAR TEST SETUP PHOTOGRAPHS

PCTESTÔ SAR & RSS-102 TEST REPORT	FCC/ IC Measurement Report		IBI	Reviewed by: Quality Manager	
SAR Filename: SAR.0501050004-R3.ANO	Test Dates: Jan. 6-12, 2005	EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model: 1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	FCC ID: ANO20040501CX2	IC ID: 349E-WM3B22BG	Page 26 of 28



## **ATTACHMENT C - DIPOLE VALIDATION**

PCTESTÔ SAR & RSS-102 TEST REPORT		FCC/ IC Measurement Report	IBI	Reviewed by: Quality Manager	
SAR Filename:		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model:	FCC ID:	IC ID:	Page 27 of 28
SAR.0501050004-R3.ANO	Jan. 6-12, 2005	1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	ANO20040501CX2	349E-WM3B22BG	1 agc 27 01 20

#### DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:719

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: 2450 Brain ( $\sigma$  = 1.83 mho/m,  $\epsilon_r$  = 38.53,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.0cm

Test Date: 01-06-2005; Ambient Temp: 22.3°C; Tissue Temp: 20.2°C

Probe: EX3DV4 - SN3550; ConvF(6.33, 6.33, 6.33); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

#### 2450MHz Dipole Validation

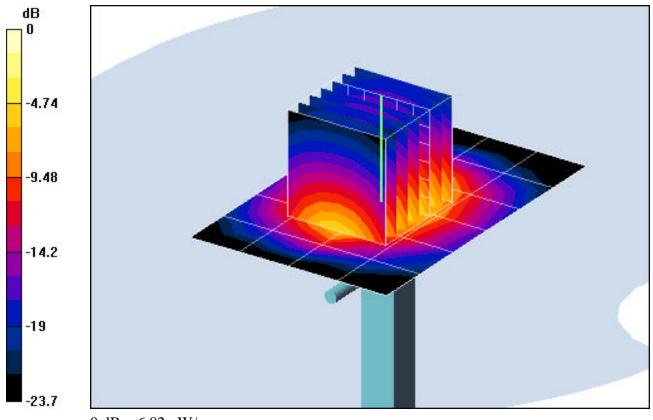
Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Input Power = 20.0 dBm (100 mW)

SAR(1 g) = 5.07 mW/g; SAR(10 g) = 2.27 mW/g

Target SAR(1g) = 5.24 mW/g; Deviation = -3.2 %



0 dB = 6.82 mW/g

#### DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:719

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: 2450 Brain ( $\sigma$  = 1.83 mho/m,  $\epsilon_r$  = 38.53,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.0cm

Test Date: 01-07-2005; Ambient Temp: 22.7°C; Tissue Temp: 20.6°C

Probe: EX3DV4 - SN3550; ConvF(6.33, 6.33, 6.33); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection) Electronics: DAE4 Sn637; Calibrated: 9/22/2004

Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

#### 2450MHz Dipole Validation

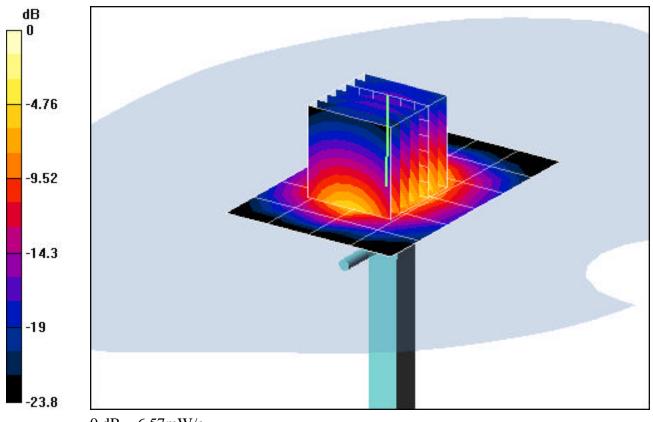
Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Input Power = 20.0 dBm (100 mW)

SAR(1 g) = 4.94 mW/g; SAR(10 g) = 2.22 mW/g

Target SAR(1g) = 5.24 mW/g; Deviation = -5.7 %



0 dB = 6.57 mW/g

#### DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:719

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: 2450 Brain ( $\sigma$  = 1.83 mho/m,  $\epsilon_r$  = 38.53,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.0cm

Test Date: 01-11-2005; Ambient Temp: 22.4°C; Tissue Temp: 20.5°C

Probe: EX3DV4 - SN3550; ConvF(6.33, 6.33, 6.33); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

#### 2450MHz Dipole Validation

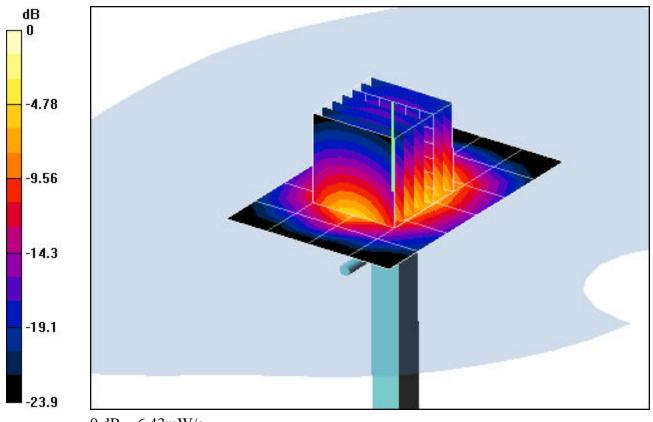
Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Input Power = 20.0 dBm (100 mW)

SAR(1 g) = 4.78 mW/g; SAR(10 g) = 2.15 mW/g

Target SAR(1g) = 5.24 mW/g; Deviation = -8.7 %



0 dB = 6.43 mW/g

#### DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:719

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: 2450 Brain ( $\sigma$  = 1.83 mho/m,  $\epsilon_r$  = 38.53,  $\rho$  = 1000 kg/m<sup>3</sup>) Phantom section: Flat Section; Space: 1.0cm

Test Date: 01-12-2005; Ambient Temp: 22.8°C; Tissue Temp: 20.6°C

Probe: EX3DV4 - SN3550; ConvF(6.33, 6.33, 6.33); Calibrated: 10/26/2004 Sensor-Surface: 3mm (Mechanical Surface Detection)

Electronics: DAE4 Sn637; Calibrated: 9/22/2004 Phantom: SAM 12b; Type: SAM 4.0; Serial: TP:1197

Measurement SW: DASY4, V4.4 Build 3; Postprocessing SW: SEMCAD, V1.8 Build 130

#### 2450MHz Dipole Validation

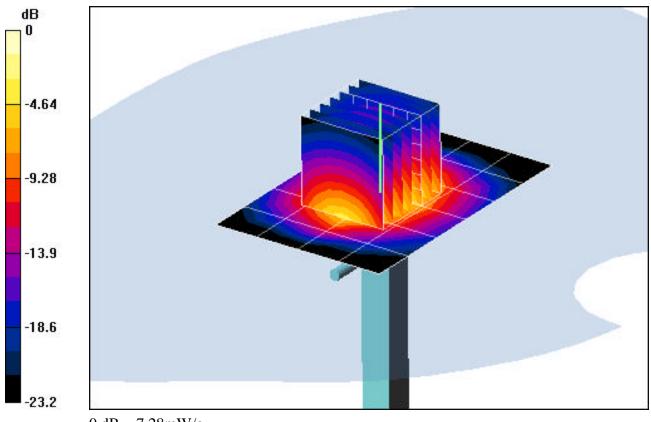
Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Input Power = 20.0 dBm (100 mW)

SAR(1 g) = 5.47 mW/g; SAR(10 g) = 2.46 mW/g

Target SAR(1g) = 5.24 mW/g; Deviation = +4.3 %



0 dB = 7.28 mW/g



#### **ATTACHMENT D - PROBE CALIBRATION**

PCTESTÔ SAR & RSS-102 TEST REPORT	<u> </u>	FCC/ IC Measurement Report	IBI	Reviewed by: Quality Manager	
SAR Filename:		EUT Type: IBM Laptop PC ThinkPad X41 Tablet Series Model:	FCC ID:	IC ID:	Page 28 of 28
SAR.0501050004-R3.ANO	Jan. 6-12, 2005	1866/1867/1868/1869 w/ 802.11b/g WLAN Adapter	ANO20040501CX2	349E-WM3B22BG	1 age 20 01 20

#### Calibration Laboratory of Schmid & Partner Engineering AG Zeughausstrasse 43, 8004 Zurich, Switzerland



S Schweizerischer Kalibrierdienst
Service suisse d'étalonnage
Servizio svizzero di taratura
Swiss Calibration Service

Accredited by the Swiss Federal Office of Metrology and Accreditation The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Certificate No: EX3-3550 Oct04

Accreditation No.: SCS 108

Client

**PC Test** 

**CALIBRATION CERTIFICATE** 

Object EX3DV4 - SN:3550

Calibration procedure(s) QA CAL-01.v5 and QA CAL-12.v4

Calibration procedure for dosimetric E-field probes

Calibration date: October 26, 2004

Condition of the calibrated item In Tolerance

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI). The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID#	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power meter E4419B	GB41293874	5-May-04 (METAS, No. 251-00388)	May-05
Power sensor E4412A	MY41495277	5-May-04 (METAS, No. 251-00388)	May-05
Reference 3 dB Attenuator	SN: S5054 (3c)	3-Apr-03 (METAS, No. 251-00403)	Aug-05
Reference 20 dB Attenuator	SN: S5086 (20b)	3-May-04 (METAS, No. 251-00389)	May-05
Reference 30 dB Attenuator	SN: S5129 (30b)	3-Apr-03 (METAS, No. 251-00404)	Aug-05
Reference Probe ES3DV2	SN:3013	8-Jan-04 (SPEAG, No. ES3-3013_Jan04)	Jan-05
DAE4	SN: 617	26-May-04 (SPEAG, No. DAE4-617_May04)	May-05
Secondary Standards	ID#	Check Date (in house)	Scheduled Check
Power sensor HP 8481A	MY41092180	18-Sep-02 (SPEAG, in house check Oct-03)	In house check: Oct 05
RF generator HP 8648C	US3642U01700	4-Aug-99 (SPEAG, in house check Dec-03)	In house check: Dec-05
Network Analyzer HP 8753E	US37390585	18-Oct-01 (SPEAG, in house check Nov-03)	In house check: Nov 04
	Name	Function	Signature
Calibrated by:	Katja Pokovic	Technical Manager	20 - 11 A
			Polipi : Kritz
		and the second second second, to be about the second second second second second second second second second s	
Approved by:	Niels Kuster	Quality Manager / /	1 1100
		/ /	/./WW
1			

Issued: October 30, 2004

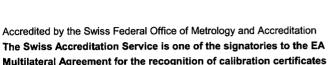
This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

Certificate No: EX3-3550\_Oct04 Page 1 of 10

#### **Calibration Laboratory of**

Schmid & Partner **Engineering AG** 

Zeughausstrasse 43, 8004 Zurich, Switzerland





Schweizerischer Kalibrierdienst S Service suisse d'étalonnage C Servizio svizzero di taratura Swiss Calibration Service

Accreditation No.: SCS 108

#### Glossary:

tissue simulating liquid TSL NORMx,y,z sensitivity in free space

sensitivity in TSL / NORMx,y,z ConF

**DCP** diode compression point φ rotation around probe axis Polarization φ

3 rotation around an axis that is in the plane normal to probe axis (at Polarization 9

measurement center), i.e.,  $\vartheta = 0$  is normal to probe axis

#### Calibration is Performed According to the Following Standards:

- a) IEEE Std 1528-2003, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- b) CENELEC EN 50361, "Basic standard for the measurement of Specific Absorption Rate related to human exposure to electromagnetic fields from mobile phones (300 MHz - 3 GHz), July 2001

#### Methods Applied and Interpretation of Parameters:

- NORMx, y, z: Assessed for E-field polarization  $\vartheta = 0$  (f  $\leq 900$  MHz in TEM-cell; f > 1800 MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx.v.z does not effect the  $E^2$ -field uncertainty inside TSL (see below ConvF).
- $NORM(f)x,y,z = NORMx,y,z * frequency_response$  (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCPx.v.z: DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- ConvF and Boundary Effect Parameters: Assessed in flat phantom using E-field (or Temperature Transfer Standard for f ≤ 800 MHz) and inside waveguide using analytical field distributions based on power measurements for f > 800 MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORMx,y,z \* ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY 4.3 B17 and higher which allows extending the validity from  $\pm$  50 MHz to  $\pm$  100 MHz.
- Spherical isotropy (3D deviation from isotropy): in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.

Certificate No: EX3-3550\_Oct04 Page 2 of 10 EX3DV4 SN:3550 October 26, 2004

# Probe EX3DV4

SN:3550

Manufactured:

Calibrated:

May 19, 2004

October 26, 2004

Calibrated for DASY Systems

(Note: non-compatible with DASY2 system!)

October 26, 2004 EX3DV4 SN:3550

#### DASY - Parameters of Probe: EX3DV4 SN:3550

Diode Compression<sup>B</sup>

NormX	<b>0.47</b> ± 9.9%	$\mu V/(V/m)^2$	DCP X	<b>92</b> mV
NormY	<b>0.49</b> ± 9.9%	$\mu V/(V/m)^2$	DCP Y	<b>92</b> mV
NormZ	$0.47 \pm 9.9\%$	$\mu$ V/(V/m) <sup>2</sup>	DCP Z	<b>92</b> mV

Sensitivity in Tissue Simulating Liquid (Conversion Factors)

Please see Page 8.

#### **Boundary Effect**

**TSL** 

900 MHz Typical SAR gradient: 5 % per mm

Sensor Center t	2.0 mm	3.0 mm	
SAR <sub>be</sub> [%]	Without Correction Algorithm	3.8	1.1
SAR <sub>be</sub> [%]	With Correction Algorithm	0.1	0.4

TSL 1750 MHz Typical SAR gradient: 10 % per mm

Sensor Center to	2.0 mm	3.0 mm	
SAR <sub>be</sub> [%]	Without Correction Algorithm	4.8	2.4
SAR <sub>be</sub> [%]	With Correction Algorithm	0.8	0.9

#### Sensor Offset

Probe Tip to Sensor Center

1.0 mm

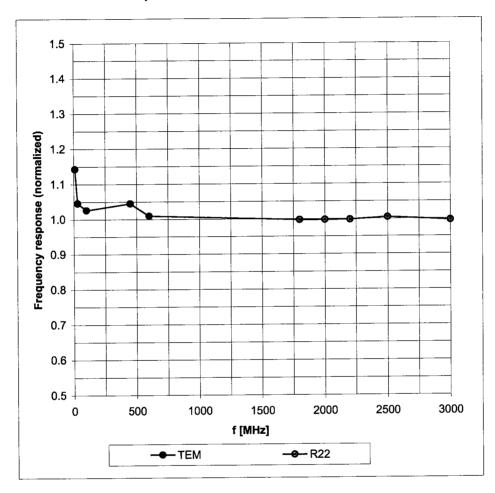
The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor k=2, which for a normal distribution corresponds to a coverage probability of approximately 95%.

<sup>&</sup>lt;sup>A</sup> The uncertainties of NormX,Y,Z do not affect the E<sup>2</sup>-field uncertainty inside TSL (see Page 8).

<sup>&</sup>lt;sup>B</sup> Numerical linearization parameter: uncertainty not required.

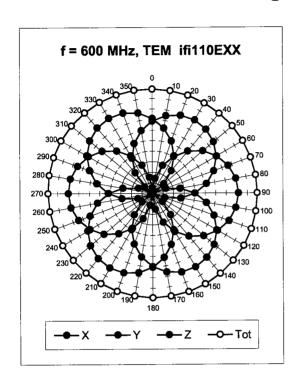
# Frequency Response of E-Field

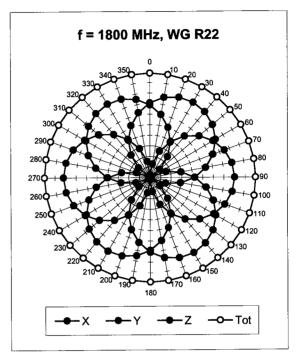
(TEM-Cell:ifi110 EXX, Waveguide: R22)

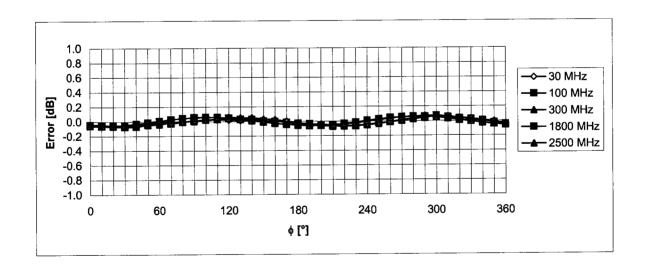


Uncertainty of Frequency Response of E-field: ± 6.3% (k=2)

Receiving Pattern ( $\phi$ ),  $\vartheta = 0^{\circ}$ 



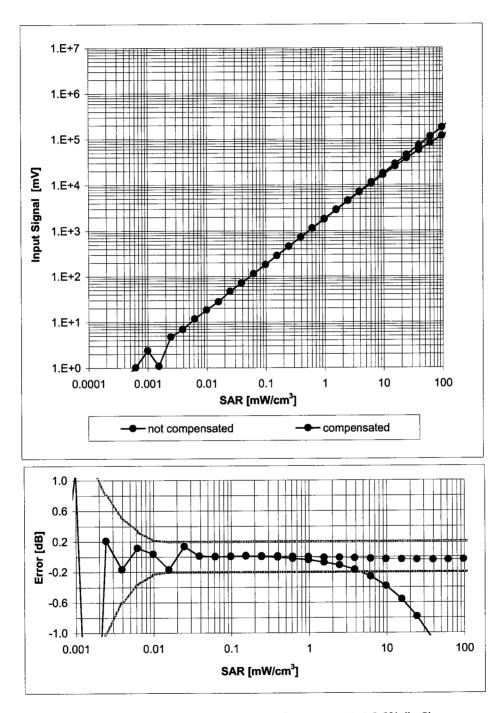




Uncertainty of Axial Isotropy Assessment: ± 0.5% (k=2)

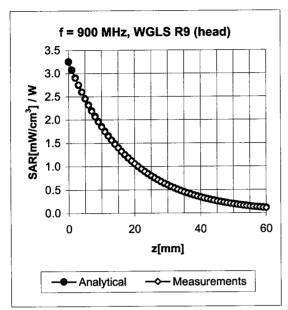
## Dynamic Range f(SAR<sub>head</sub>)

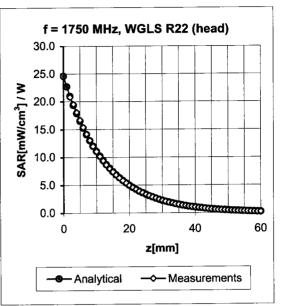
(Waveguide R22, f = 1800 MHz)



Uncertainty of Linearity Assessment: ± 0.6% (k=2)

### **Conversion Factor Assessment**





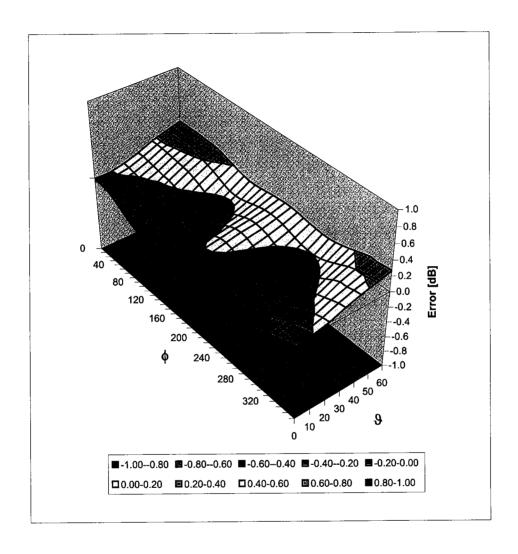
f [MHz]	Validity [MHz] <sup>C</sup>	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
450	± 50 / ± 100	Head	43.5 ± 5%	0.87 ± 5%	-0.03	2.33	8.28 ± 13.3% (k=2)
835	± 50 / ± 100	Head	41.5 ± 5%	0.90 ± 5%	0.92	0.65	8.12 ± 11.0% (k=2)
900	± 50 / ± 100	Head	41.5 ± 5%	0.97 ± 5%	0.97	0.62	7.76 ± 11.0% (k=2)
1640	± 50 / ± 100	Head	40.3 ± 5%	1.29 ± 5%	0.69	0.73	7.28 ± 11.0% (k=2)
1750	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.64	0.80	6.97 ± 11.0% (k=2)
1900	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.54	0.96	6.75 ± 11.0% (k=2)
1950	± 50 / ± 100	Head	40.0 ± 5%	1.40 ± 5%	0.57	0.88	6.62 ± 11.0% (k=2)
2450	± 50 / ± 100	Head	39.2 ± 5%	1.80 ± 5%	0.61	0.78	6.33 ± 11.8% (k=2)
450	± 50 / ± 100	Body	56.7 ± 5%	0.94 ± 5%	-0.08	2.62	8.05 ± 13.3% (k=2)
835	± 50 / ± 100	Body	55.2 ± 5%	0.97 ± 5%	0.98	0.65	7.99 ± 11.0% (k=2)
900	± 50 / ± 100	Body	55.0 ± 5%	1.05 ± 5%	1.01	0.63	7.75 ± 11.0% (k=2)
1640	± 50 / ± 100	Body	53.8 ± 5%	1.40 ± 5%	0.58	0.99	6.82 ± 11.0% (k=2)
1750	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.50	1.16	6.48 ± 11.0% (k=2)
1900	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.47	1.32	6.35 ± 11.0% (k=2)
1950	± 50 / ± 100	Body	53.3 ± 5%	1.52 ± 5%	0.64	0.83	6.53 ± 11.0% (k=2)
2450	± 50 / ± 100	Body	52.7 ± 5%	1.95 ± 5%	0.83	0.64	6.27 ± 11.8% (k=2)

 $<sup>^{\</sup>rm c}$  The validity of  $\pm$  100 MHz only applies for DASY 4.3 B17 and higher (see Page 2). The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band.

EX3DV4 SN:3550 October 26, 2004

### **Deviation from Isotropy in HSL**

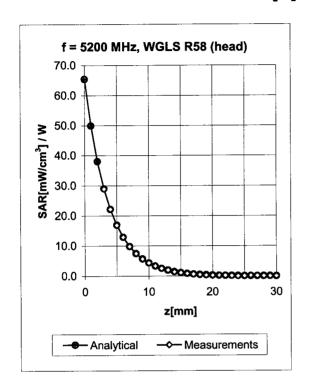
Error ( $\phi$ ,  $\vartheta$ ), f = 900 MHz

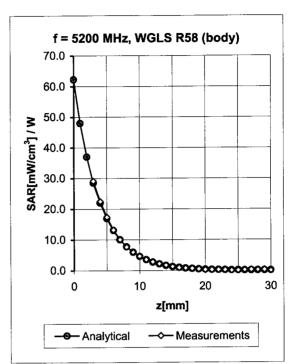


Uncertainty of Spherical Isotropy Assessment: ± 2.6% (k=2)

EX3DV4 SN:3550 October 26, 2004

# **Appendix**<sup>D</sup>





f [MHz] <sup>c</sup>	Validity [MHz]	TSL	Permittivity	Conductivity	Alpha	Depth	ConvF Uncertainty
5200	± 50	Head	36.0 ± 5%	4.76 ± 5%	0.45	1.80	4.17 ± 13.6% (k=2)
5500	± 50	Head	35.6 ± 5%	4.96 ± 5%	0.47	1.80	3.77 ± 13.6% (k=2)
5800	± 50	Head	35.3 ± 5%	5.27 ± 5%	0.48	1.80	3.74 ± 13.6% (k=2)
5200	± 50	Body	49.0 ± 5%	5.30 ± 5%	0.50	1.90	3.72 ± 13.6% (k=2)
5500	± 50	Body	48.6 ± 5%	5.65 ± 5%	0.50	1.95	3.47 ± 13.6% (k=2)
5800	± 50	Body	48.2 ± 5%	6.00 ± 5%	0.50	1.95	3.48 ± 13.6% (k=2)

<sup>&</sup>lt;sup>D</sup> Accreditation for ConvF assessment above 3000 MHz is currently applied for. Accreditation is expected at the beginning of 2005.