CERTIFICATE OF COMPLIANCE SAR EVALUATION

<u>Test Lab:</u>		Applicant Information:
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Fax:250 - 860-3110Foll Free:1-877-545-6287e-mail:info@celltechlabs.cweb site:www.celtechlabs.co		
FCC Rule Part(s): FCC ID: Model(s): Equipment Type: Classification: Tx Frequency Range: Output Power Tested: Antenna Type:	O6YUTS-70 UTS-700X Single-Mod	e PCS TDMA Phone ensed Portable Transmitter Held to Ear (PCE) 009.95 MHz IRP)

This wireless portable device has been shown to be compliant for localized Specific Absorption Rate (SAR) for uncontrolled environment/general exposure limits specified in ANSI/IEEE Std. C95.1-1992 and has been tested in accordance with the measurement procedures specified in ANSI/IEEE Std. C95.3-1999.

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

Celltech Research Inc. certifies that no party to this application has been denied FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853(a).

Shawn McMillen General Manager Celltech Research Inc.



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1.0 INTRODUCTION

This measurement report shows compliance of the UTSTARCOM INC. Model: UTS-700X Single-Mode PCS TDMA Phone FCC ID: O6YUTS-700X with FCC Part 2.1093, ET Docket 96-326 Rules for mobile and portable devices. The test procedures described in American National Standards Institute C95.1-1992 (1), FCC OET Bulletin 65, Supplement C (Edition 01-01) were employed. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the evaluation, equipment used, and the various provisions of the rules are included within this test report.

2.0 DESCRIPTION of Equipment Under Test (EUT)

EUT Type	PCS TDMA Phone	FCC ID	O6YUTS-700X
Equipment Class	Part 24 Licensed Portable Transmitter Held to Ear (PCE)	Model No.(s)	UTS-700X
FCC Rule Part(s)	§ 2.1093, Docket 96-326	Application Type	Part 24 Certification
Tx Frequency Range (MHz)	1893.65 – 1909.95	S/N No.	Pre-production
Modulation	TDMA	RF Output Power Tested	0.147 Watts (EIRP)
Antenna Type	Fixed Stubby	Battery Type(s)	3.6V 350mAh Ni-Cd Battery

3.0 SAR MEASUREMENT SYSTEM

Celltech Research SAR measurement facility utilizes the Dosimetric Assessment System (DASYTM) manufactured by Schmid & Partner Engineering AG (SPEAGTM) of Zurich, Switzerland. The DASY system is comprised of the robot controller, computer, near-field probe, probe alignment sensor, and the generic twin phantom containing brain or muscle 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). A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card. The DAE3 utilizes 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, which are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.



Celltech's DASY3 SAR Measurement System

4.0 MEASUREMENT SUMMARY

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

HEAD SAR MEASUREMENT RESULTS

Freq. (MHz)	Channel	Mode	RF Output Power (EIRP)	Battery Type	Antenna Position	Phantom Section	Test Position	SAR (w/kg)
1902.35	Mid	TDMA	0.147 W	Standard	Fixed	Left Ear	Cheek/Touch	0.0477
1902.35	Mid	TDMA	0.147 W	Standard	Fixed	Left Ear	Ear/Tilt	0.0727
1902.35	Mid	TDMA	0.147 W	Standard	Fixed	Right Ear	Cheek/Touch	0.0653
1902.35	Mid	TDMA	0.147 W	Standard	Fixed	Right Ear	Ear/Tilt	0.0972
Mixture Type: BRAIN Dielectric Constant: 40.5 Conductivity: 1.35			Spati	al Peak Un	controlled	Exposure/	FETY LIMIT General Popul over 1 gram)	ation

Notes:

- 1. The SAR values found for mid channel in each test configuration were 2.0dB or greater below the SAR limit of 1.6 w/kg, therefore only the mid channel data is reported.
- 2. The highest head SAR value found was 0.0972 w/kg (right ear, ear/tilt position).
- 3. The EUT was tested using the standard battery, which is the only battery option for this phone.

4.	Ambient TEMPERATURE:	22.7 °C
	Relative HUMIDITY:	56.4 %
	Atmospheric PRESSURE:	95.5 kPa

MEASUREMENT SUMMARY (CONT.)

BODY SAR MEASUREMENT RESULTS

Freq. (MHz)	Chan.	Mode	RF Output Power (EIRP)	Phantom Section	Battery Type	Sep. Dist. (cm)	Antenna Position	SA (w/l Measured SAR values with 3.2mm phantom	
1902.35	Mid	TDMA	0.147 W	Flat	Standard	0.0	Fixed	0.109	0.122
Mixture Type: Muscle Dielectric Constant: 54.6 Conductivity: 1.39			Spatial P	eak Uncon	trolled	Exposure/0	ETY LIMIT General Populat ver 1 gram)	ion	

Notes:

- 1. The actual thickness of the flat phantom shell as reported by the system manufacturer was 3.2mm instead of the required 2.0mm thickness (see Appendix B). As a result of the increased thickness, the measured SAR values were 12% lower than expected. The final SAR values were extrapolated from the measured SAR values and calculated for a 2.0mm flat phantom shell thickness.
- 2. The SAR value found for mid channel was 2.0dB or greater below the SAR limit of 1.6 w/kg, therefore only the mid channel data is reported.
- 3. The EUT was tested using the standard battery, which is the only battery option for this phone.
- 4. The EUT was tested for body SAR with the back of the EUT touching the outer surface of the planar phantom.
- 5. Ambient TEMPERATURE:22.7 °CRelative HUMIDITY:56.4 %Atmospheric PRESSURE:95.5 kPa

5.0 DETAILS OF SAR EVALUATION

The UTSTARCOM INC. Model: UTS-700X Single-Mode PCS TDMA Phone FCC ID: O6YUTS-700X was found to be compliant for localized Specific Absorption Rate (SAR) based on the following test provisions and conditions:

- 1) The handset was placed in the device holder in a normal operating position with the test device reference point located along the vertical centerline on the front of the device aligned to the ear reference point, with the center of the earpiece touching the center of the ear spacer of the phantom.
- 2) With the handset positioned parallel to the cheek, the test device reference point was aligned to the ear reference point on the head phantom, and the vertical centerline was aligned to the phantom reference plane (initial ear position).
- 3) While maintaining the three alignments, the body of the handset was gradually adjusted to each of the following test positions:

a). Cheek/Touch Position: The handset was brought toward the mouth of the head phantom by pivoting against the ear reference point until any point of the mouthpiece or keypad touched the phantom.

b). Ear/Tilt Position: With the phone aligned in the Cheek/Touch position, the handset was tilted away from the mouth with respect to the test device reference point by 15 degrees.

- 4) The EUT was investigated for head SAR on both the left and right sides of the phantom.
- 5) The EUT was tested in a body-worn configuration with the back of the phone placed parallel to, and touching, the outer surface of the planar phantom.
- 6) SAR measurements were evaluated at maximum power and the unit was operated for an appropriate period prior to the evaluation in order to minimize drift.
- 7) The EUT was tested at the maximum conducted power level set by the manufacturer.
- 8) The EUT's transmitter was keyed to operate continuously in the appropriate mode for the duration of the test.
- 9) The location of the maximum spatial SAR distribution (Hot Spot) was determined relative to the handset and its antenna.
- 10) The EUT was tested with a fully charged battery.

6.0 EVALUATION PROCEDURES

The Specific Absorption Rate (SAR) evaluation was performed in the following manner:

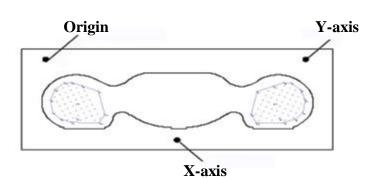
a. (i) The evaluation was performed in the applicable area of the phantom depending on the type of device being tested. For devices held to the ear during normal operation, both the left and right ear positions were evaluated, with the device antenna in both the extended and extracted positions as applicable.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

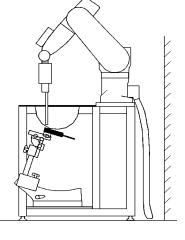
(ii) For face-held and body-worn devices, or devices which can be operated within 20cm of the body, the planar section of the phantom was used. The type of device being evaluated determined the distance of the EUT to the outer surface of the planar phantom.

b. The SAR was determined by a pre-defined procedure within the DASY3 software. Upon completion of a reference and optical surface check, the exposed region of the phantom was scanned near the inner surface with a grid spacing of 20mm x 20mm.

c. For frequencies below 500MHz a 4x4x7 matrix was performed around the greatest spatial SAR distribution found during the area scan of the applicable exposed region. For frequencies above 500MHz a 5x5x7 matrix was performed. SAR values were then calculated using a 3-D spline interpolation algorithm and averaged over spatial volumes of 1 and 10 grams.

d. If the EUT had any appreciable drift over the course of the evaluation, then the EUT was reevaluated. Any unusual anomalies over the course of the test also warranted a re-evaluation.





Area Scan Measurement Points

DASY3 SAR Measurement Setup

7.0 SAR SAFETY LIMITS

EXPOSURE LIMITS (General Population / Uncontrolled Exposure Environment)	SAR (W/Kg)
Spatial Average (averaged over the whole body)	0.08
Spatial Peak (averaged over any 1g of tissue)	1.60
Spatial Peak (hands/wrists/feet/ankles averaged over 10g)	4.00

- Notes: 1. The FCC SAR safety limits specified in the table above apply to devices operated in the General Population / Uncontrolled Exposure environment.
 - 2. Uncontrolled environments are defined as locations where there is exposure of individuals who have no knowledge or control of their exposure.

8.0 SYSTEM VALIDATION

Prior to the assessment, the system was verified in the planar region of the phantom. For devices operating below 1GHz, an 835MHz dipole or 900MHz was used. For devices operating above 1GHz, an 1800MHz dipole was used. A forward power of 250mW was applied to the dipole, and the system was verified to a tolerance of $\pm 10\%$. The applicable verification is as follows (see Appendix B for validation test plot and explanation of phantom thickness):

	Target SA	Measured SAR		
Dipole Validation Kit	Target SAR value with 2.0mm phantom	Extrapolated SAR value with 3.2mm phantom	1g (w/kg)	
D1800V2	9.66	8.63	8.45	

9.0 SIMULATED TISSUES

The 1800MHz brain and muscle mixture consists of Glycol-monobutyl, water, and salt. The fluid was prepared according to standardized procedures, and measured for dielectric parameters (permitivity and conductivity).

INGREDIENT	MIXTURE (%) 1800MHz Brain (& Validation)	MIXTURE (%) 1800MHz Muscle
Water	54.90	69.91
Glycol Monobutyl	44.92	29.96
Salt	0.18	0.13

10.0 TISSUE PARAMETERS

The dielectric parameters of the fluids were verified prior to the SAR evaluation using an 85070C Dielectric Probe Kit and an 8753E Network Analyzer. The dielectric parameters of the fluid are as follows:

Equivalent Tissue (1800MHz)	Dielectric Constant e r	Conductivity s (mho/m)	r (Kg/m ³)
Brain (& Validation)	$40.5\pm5\%$	$1.35 \pm 5\%$	1000
Muscle	$54.6\pm5\%$	$1.39\pm5\%$	1000

11.0 ROBOT SYSTEM SPECIFICATIONS

Specifications

POSITIONER:	Stäubli Unimation Corp. Robot Model: RX60L
Repeatability:	0.02 mm
No. of axis:	6

Data Acquisition Electronic (DAE) System

<u>Cell Controller</u>	
Processor:	Pentium III
Clock Speed:	450 MHz
Operating System:	Windows NT
Data Card:	DASY3 PC-Board
Data Converter	
Features:	Signal Amplifier, multiplexer, A/D converter, and control logic
Software:	DASY3 software
Connecting Lines:	Optical downlink for data and status info. Optical uplink for commands and clock

PC Interface Card

Function:

24 bit (64 MHz) DSP for real time processingLink to DAE316 bit A/D converter for surface detection systemserial link to robotdirect emergency stop output for robot

E-Field Probe

Model:	ET3DV6
Serial No.:	1590
Construction:	Triangular core fiber optic detection system
Frequency:	10 MHz to 6 GHz
Linearity:	\pm 0.2 dB (30 MHz to 3 GHz)

Phantom

Phantom:	Generic Twin
Shell Material:	Fiberglass
Thickness:	Left/Right Head - 2.0 ± 0.1 mm
	Planar Phantom - $3.2 \pm 0.1 \text{ mm}$

12.0 PROBE SPECIFICATION (ET3DV6)

Construction: Calibration:	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g. In air from 10 MHz to 2.5 GHz In brain simulating tissue at frequencies of 900 MHz	glycol)
	and 1.8 GHz (accuracy $\pm 8\%$)	
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB	
1 5	(30 MHz to 3 GHz)	
Directivity:	\pm 0.2 dB in brain tissue (rotation around probe axis)	
	\pm 0.4 dB in brain tissue (rotation normal to probe axis)	
Dynam. Rnge	: 5 μ W/g to > 100 mW/g; Linearity: \pm 0.2 dB	
Srfce. Detect.	± 0.2 mm repeatability in air and clear liquids over	
	diffuse reflecting surfaces	
Dimensions:	Overall length: 330 mm	
	Tip length: 16 mm	
	Body diameter: 12 mm	
	Tip diameter: 6.8 mm	
	Distance from probe tip to dipole centers: 2.7 mm	
Application:	General dosimetry up to 3 GHz	ET3DV6 E-Field Probe
	Compliance tests of mobile phone	

13.0 GENERIC TWIN PHANTOM

The generic twin phantom is a fiberglass shell phantom with a 2.0mm left and right head shell thickness and a 3.2mm flat planar area. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.



Generic Twin Phantom

14.0 DEVICE HOLDER

The DASY3 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65° .



Device Holder

15.0 TEST EQUIPMENT LIST

SAR MEASUREMENT SYSTEM					
<u>EQUIPMENT</u>	<u>SERIAL NO.</u>	CALIBRATION DATE			
DASY3 System -Robot -ET3DV6 E-Field Probe -DAE -835MHz Validation Dipole -900MHz Validation Dipole -1800MHz Validation Dipole	599396-01 1590 383 411 054 247	N/A Mar 2001 Sept 1999 Aug 1999 June 2001 June 2001			
-Generic Twin Phantom V3.0 85070C Dielectric Probe Kit	N/A N/A	N/A N/A			
Gigatronics 8652A Power Meter -Power Sensor 80701A -Power Sensor 80701A	1835272 1833535 1833542	Oct 1999 May 2001 Feb 2001			
E4408B Spectrum Analyzer	US39240170	Nov 1999			
8594E Spectrum Analyzer	3543A02721	Mar 2000			
8753E Network Analyzer	US38433013	Nov 1999			
8648D Signal Generator	3847A00611	N/A			
5S1G4 Amplifier Research Power Amplifier	26235	N/A			

16.0 MEASUREMENT UNCERTAINTIES

Uncertainty Description	Error	Distribution	Weight	Standard Deviation	Offset
Probe Uncertainty					
Axial isotropy	±0.2 dB	U-Shaped	0.5	±2.4 %	
Spherical isotropy	±0.4 dB	U-Shaped	0.5	±4.8 %	
Isotropy from gradient	±0.5 dB	U-Shaped	0	±	
Spatial resolution	±0.5 %	Normal	1	±0.5 %	
Linearity error	±0.2 dB	Rectangle	1	±2.7 %	
Calibration error	±3.3 %	Normal	1	±3.3 %	
SAR Evaluation Uncertainty					
Data acquisition error	±1 %	Rectangle	1	±0.6 %	
ELF and RF disturbances	±0.25 %	Normal	1	±0.25 %	
Conductivity assessment	±5 %	Rectangle	1	±5.8 %	
Spatial Peak SAR Evaluation Uncertainty					
Extrapolated boundary effect	±3 %	Normal	1	±3 %	±5 %
Probe positioning error	±0.1 mm	Normal	1	±1 %	
Integrated and cube orientation	±3 %	Normal	1	±3 %	
Cube Shape inaccuracies	±2 %	Rectangle	1	±1.2 %	
Device positioning	±6 %	Normal	1	±6 %	
Combined Uncertainties				±11.7 %	±5 %

Measurement uncertainties in SAR measurements are difficult to quantify due to several variables including biological, physiological, and environmental. However, the estimated measurement uncertainties in SAR are less than 15-25 %.

According to ANSI/IEEE C95.3, the overall uncertainties are difficult to assess and will vary with the type of meter and usage situation. However, accuracy's of ± 1 to 3 dB can be expected in practice, with greater uncertainties in near-field situations and at higher frequencies (shorter wavelengths), or areas where large reflecting objects are present. Under optimum measurement conditions, SAR measurement uncertainties of at least ± 2 dB can be expected.

According to CENELEC, typical worst-case uncertainty of field measurements is \pm 5 dB. For well-defined modulation characteristics the uncertainty can be reduced to \pm 3 dB.

17.0 REFERENCES

(1) ANSI, ANSI/IEEE C95.1: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 Ghz, The Institute of Electrical and Electronics Engineers, Inc., New York, NY 10017, 1992;

(2) Federal Communications Commission, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields", OET Bulletin 65, FCC, Washington, D.C. 20554, 1997;

(3) Thomas Schmid, Oliver Egger, and Neils Kuster, "Automated E-field scanning system for dosimetric assessments", IEEE *Transaction on Microwave Theory and Techniques*, Vol. 44, pp. 105 – 113, January, 1996.

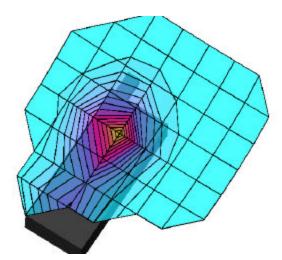
(4) Niels Kuster, Ralph Kastle, and Thomas Schmid, "Dosimetric evaluation of mobile communications equipment with know precision", IEICE Transactions of Communications, vol. E80-B, no. 5, pp. 645 – 652, May 1997.

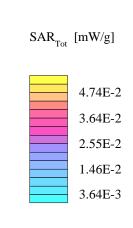
Test Report S/N: 081001-15106Y Date(s) of Tests: August 15, 2001 FCC SAR Measurements

APPENDIX A - SAR MEASUREMENT DATA

 $\begin{array}{l} \textbf{UTStarcom Inc. FCC ID: O6YUTS-700X} \\ \textbf{Generic Twin Phantom; Left Hand Section; Position: (75°,65°)} \\ \textbf{Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 3.0} \\ \textbf{1800MHz Brain: } \sigma = 1.35 \ mho/m \ \epsilon_r = 40.5 \ \rho = 1.00 \ g/cm^3 \\ \textbf{Coarse: Dx} = 20.0, \ \textbf{Dy} = 20.0, \ \textbf{Dz} = 10.0 \\ \textbf{Cube } 4x4x7 \\ \textbf{SAR (1g): 0.0477 mW/g, SAR (10g): 0.0278 mW/g} \end{array}$

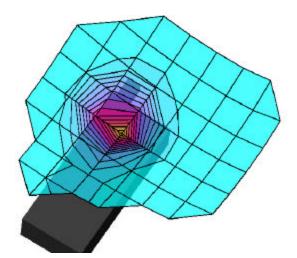
Head SAR - Cheek/Touch Position UTStarcom Model: UTS-700X Mid Channel [1902.35 MHz] Power Level: 0.147 W (EIRP) TDMA Modulation Date Tested: August 15, 2001

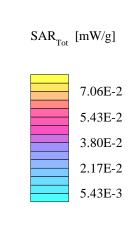




 $\begin{array}{l} \textbf{UTStarcom Inc. FCC ID: O6YUTS-700X} \\ \textbf{Generic Twin Phantom; Left Hand Section; Position: (90°,65°)} \\ \textbf{Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 3.0} \\ \textbf{1800MHz Brain: } \sigma = 1.35 \ mho/m \ \epsilon_r = 40.5 \ \rho = 1.00 \ g/cm^3 \\ \textbf{Coarse: Dx} = 20.0, \ \textbf{Dy} = 20.0, \ \textbf{Dz} = 10.0 \\ \textbf{Cube } 4x4x7 \\ \textbf{SAR (1g): 0.0727 \ mW/g, SAR (10g): 0.0413 \ mW/g} \end{array}$

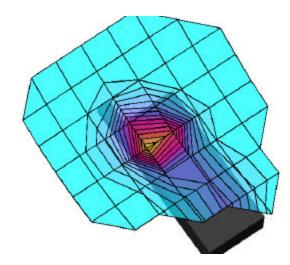
Head SAR - Ear/Tilt Positoin UTStarcom Model: UTS-700X Mid Channel [1902.35 MHz] Power Level: 0.147 W (EIRP) TDMA Modulation Date Tested: August 15, 2001

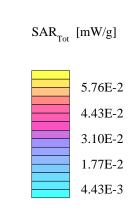




 $\begin{array}{l} \textbf{UTStarcom Inc. FCC ID: O6YUTS-700X} \\ \textbf{Generic Twin Phantom; Right Hand Section; Position: (75°,65°)} \\ \textbf{Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 3.0} \\ \textbf{1800MHz Brain: } \sigma = 1.35 \text{ mho/m } \epsilon_r = 40.5 \ \rho = 1.00 \ \text{g/cm}^3 \\ \textbf{Coarse: Dx} = 20.0, \ \textbf{Dy} = 20.0, \ \textbf{Dz} = 10.0 \\ \textbf{Cube } 5x5x7 \\ \textbf{SAR (1g): 0.0653 mW/g, SAR (10g): 0.0370 mW/g} \end{array}$

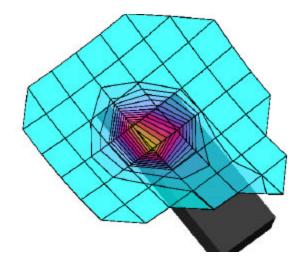
Head SAR - Cheek/Touch Position UTStarcom Model: UTS-700X Mid Channel [1902.35 MHz] Power Level: 0.147 W (EIRP) TDMA Modulation Date Tested: August 15, 2001

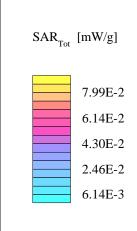




 $\begin{array}{l} \textbf{UTStarcom Inc. FCC ID: O6YUTS-700X} \\ \textbf{Generic Twin Phantom; Right Hand Section; Position: (90°,65°)} \\ \textbf{Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 3.0} \\ \textbf{1800MHz Brain: } \sigma = 1.35 \text{ mho/m } \epsilon_r = 40.5 \ \rho = 1.00 \ \text{g/cm}^3 \\ \textbf{Coarse: Dx} = 20.0, \ \textbf{Dy} = 20.0, \ \textbf{Dz} = 10.0 \\ \textbf{Cube } 5x5x7 \\ \textbf{SAR (1g): 0.0972 } \text{mW/g, SAR (10g): 0.0534 } \text{mW/g} \end{array}$

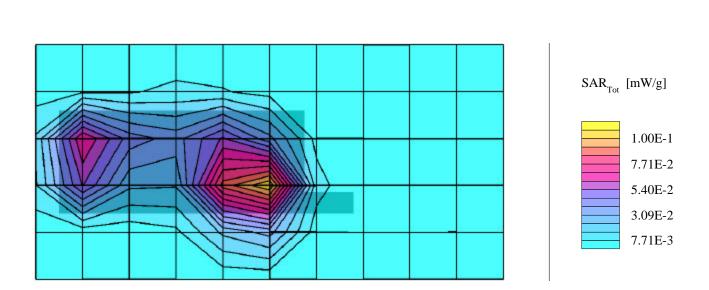
Head SAR - Ear/Tilt Position UTStarcom Model: UTS-700X Mid Channel [1902.35MHz] Power Level: 0.147 W (EIRP) TDMA Modulation Date Tested: August 15, 2001





 $\begin{array}{l} \textbf{UTStarcom Inc. FCC ID: O6YUTS-700X} \\ \textbf{Generic Twin Phantom; Flat Section; Position: (270°,270°)} \\ \textbf{Probe: ET3DV6 - SN1590; ConvF(5.78,5.78,5.78); Crest factor: 3.0} \\ \textbf{1800MHz Muscle: } \sigma = 1.39 \ mho/m \ \epsilon_r = 54.6 \ \rho = 1.00 \ g/cm^3 \\ \textbf{Coarse: Dx} = 20.0, \ Dy = 20.0, \ Dz = 10.0 \\ \textbf{Cube 5x5x7} \\ \textbf{SAR (1g): 0.109 \ mW/g, SAR (10g): 0.0584 \ mW/g} \end{array}$

Body SAR at 0.0cm Separation Distance UTStarcom Model: UTS-700X Mid Channel [1902.35 MHz] Power Level: 0.147 W (EIRP) TDMA Modulation Date Tested: August 15, 2001



APPENDIX B - DIPOLE VALIDATION

The manufacturer of the DASY3 generic twin phantom has determined that the planar section used during system validations and body SAR RF exposure evaluation is 3.2mm, as opposed to the 2.0mm required thickness (OET Bulletin 65, Supplement C, Edition 01-01). As a result of this increased thickness, both the system validation and body SAR measurements report a 12% lower assessed value. Attached is the notice from the device manufacturer regarding the change in procedure of dipole calibration due to the increased shell thickness of the generic twin phantom. Also attached from the device manufacturer is the summary of validation dipole target numbers for the increased phantom shell thickness. Please note that the shell thickness of the left and right head of the generic twin phantom is the required 2.0mm.

MC0300: Change in Procedure of Dipole Calibration

Procedure Before February 2000

The distance between the dipole axis and head tissue simulating liquid was based on the specifications given by the vendor manufacturing the generic twin phantom. The specifications for the shell thickness were 2 ± 0.2 mm at the location where the phone touches the head as well as at the location of dipole validation in the flat phantom area. The thickness of the first phantom was carefully verified using the robot, which is a very tedious and time consuming procedure. Afterward, Schmid & Partner Engineering AG (SPEAG) relied on the manufacturer's specifications, since suitable equipment for routine validation of the shell thickness was not available before January 2000.

Rationale for Change of Procedure

During the course of closing the remaining gaps of quality control of our products and production, SPEAG purchased the hall effect wall thickness gauge MINITEST FH4100 of ElektroPhysik in January 2000. This instrumentation enables measurement of the shell thickness with a precision of better than ± 0.1 mm. Verification of the phantoms revealed that the production variability in the regions of validation is considerably larger, i.e., about 2.8 \pm 0.4 mm, which is due to an unnotified change in the production method of the vendor. The mean and deviation were estimated thereafter based on a limited number of samples.

The thickness of the phantom used for dipole calibration has a thickness of 3.2 ± 0.1 mm. In other words, the distances between the dipole axis and the liquid were 16.2 mm and not 15 mm below 1 GHz and 11.2 instead of 10 mm above 1 GHz. Therefore, an incorrect distance is stated in all calibration documents issued before February 2000. This does not effect laboratories using the generic twin phantom, only those groups which use other phantoms.

Changes in Procedure (effective February 2000)

1) Rigorous quality control of the new phantoms and conduct of the calibration at the correct distances of 15 mm and 10 mm respectively.

2) Provision of the corrected calibration distance as well as of extrapolated values for the distances 15, 15.5 and 16 mm for customers using phantoms other than the generic twin phantom. The latter are extrapolated values based on a series of measurements conducted with different dipoles which therefore have slightly enhanced uncertainties.

Suggested on: <u>15.04.</u>2000

Approved on: <u>16.04.2000</u>

by: There Kah

Schmid & Partner Engineering AG

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D1800V2 – SN:247 Summary of Dipole Data (June 20, 2001)

SAR Measurement

In the Table 1 averaged measured and extrapolated SAR values are normalized to a dipole input power of 1W (forward power). The dipole was position below the flat phantom filled with head-tissue simulating liquid (ϵ =40.0, σ =1.36).

Distance (mm)	SAR (1g) mW/g	SAR (10g) mW/g	Validation Repeatability (Standard deviation)	Method
10.0	38.7	20.1	±4%	Calibrated
10.5	36.8	19.3	± 5%	Extrapolated
11.0	35.1	18.6	± 5%	Extrapolated
11.2 ¹	34.5	18.3	± 5%	Extrapolated

In the Table 2 averaged measured and extrapolated SAR values are normalized to a dipole input power of 1W (forward power). The dipole was position below the flat phantom filled with head-tissue simulating liquid (ε =40.1, σ =1.71).

Distance	SAR (1g)	SAR (10g)	Validation Repeatability	Method
(mm)	mW/g	mW/g	(Standard deviation)	
10.0	43.6	21.6	± 4%	Calibrated
10.5	41.5	20.8	± 5%	Extrapolated
11.0	39.6	20.1	± 5%	Extrapolated
11.2 ¹	38.9	19.8	± 5%	Extrapolated

Dipole Impedance and Return Loss

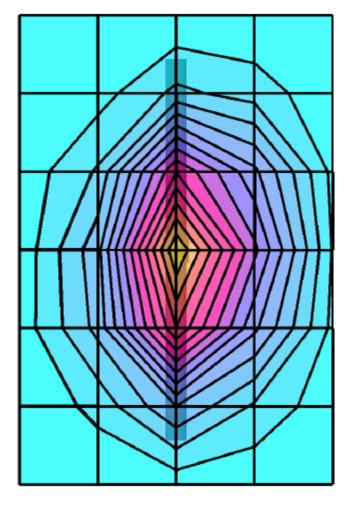
The transformation parameters from the SMA-connector to the dipole feedpoint are:

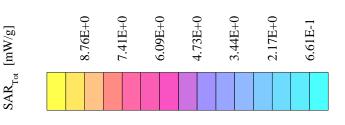
Electrical delay:	1.208 ns	(one direction)
Transmission factor:	0.995	(voltage transmission, one direction)

¹ As explained in the document "MC0300: Change in Procedure of Dipole Calibration" of April 15th, 2000, the distance between the dipole axis and liquid was 1.2 mm more than stated in the original documents issued before February 2000. The extrapolated values and the given uncertainties have been carefully evaluated and have been validated by measurements and computations.

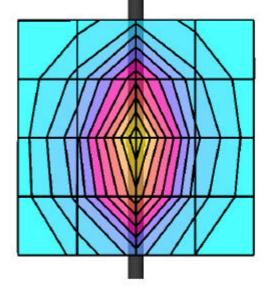
Dipole 1800MHz

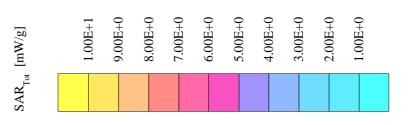
Test Date: August 15, 2001





Probe: ET3DV6 - SN1507; ConvF(5.57,5.57); Crest factor: 1.0; IEEE1528 1800 MHz : $\sigma = 1.36 \text{ mho/m} \ \epsilon_r = 40.0 \ \rho = 1.00 \ g/cm^3$ Cubes (2): Peak: 18.2 mW/g ± 0.04 dB, SAR (1g): 9.66 mW/g ± 0.03 dB, SAR (10g): 5.02 mW/g ± 0.03 dB, (Worst-case extrapolation) Penetration depth: 8.2 (7.6, 9.4) [mm] Powerdrift: -0.01 dB Generic Twin Phantom; Flat Section; Grid Spacing:Dx = 15.0, Dy = 15.0, Dz = 10.0 Validation Dipole D1800V2 SN:247, d = 10 mmFrequency: 1800 MHz; Antenna Input Power: 250 [mW]





Test Report S/N: 081001-15106Y Date(s) of Tests: August 15, 2001 FCC SAR Measurements

APPENDIX C - PROBE CALIBRATION

Probe ET3DV6

SN:1590

Manufactured: Calibrated: March 19, 2001 March 26, 2001

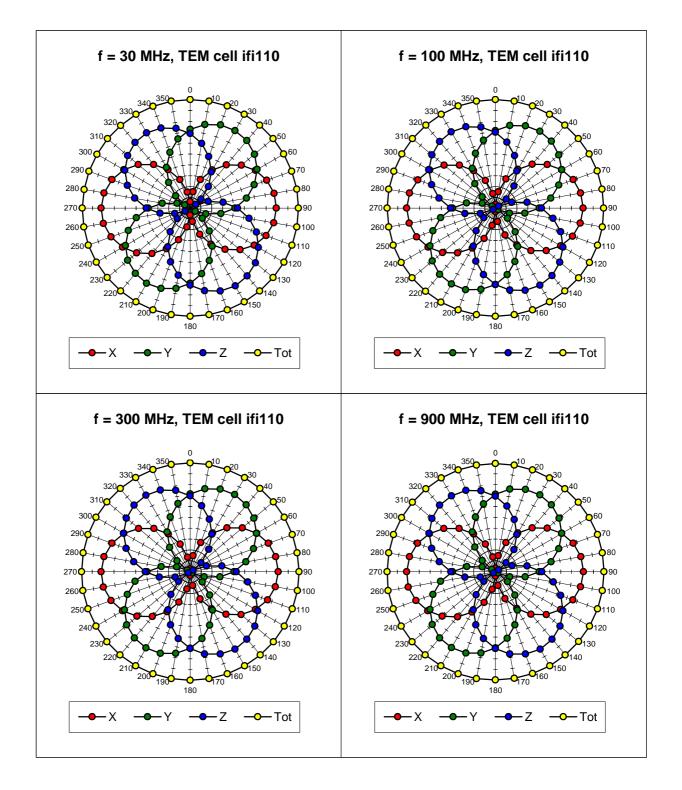
Calibrated for System DASY3

DASY3 - Parameters of Probe: ET3DV6 SN:1590

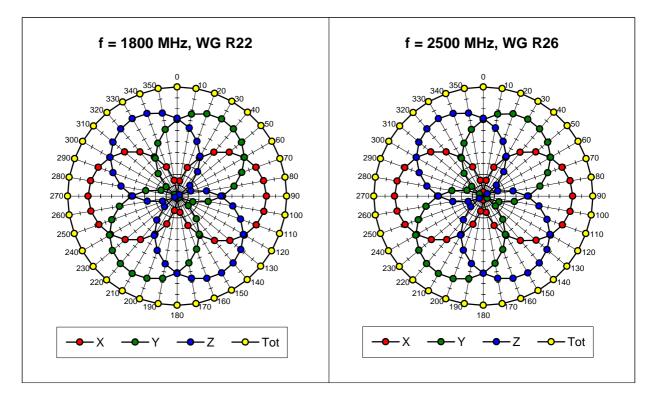
Sensitiv	vity in Free S	space	Diode (Compression	1	
	NormX	1.77	μV/(V/m) ²		DCP X	100 mV
	NormY		$\mu V/(V/m)^2$		DCP Y	100 mV
	NormZ	1.67	μV/(V/m) ²		DCP Z	100 mV
Sensitiv	vity in Tissue	Sim	ulating Liquid			
Head	450 MH	z	e _r = 43.5 ± 5%	S :	= 0.87 ± 10% mh	o/m
	ConvF X	7.36	extrapolated		Boundary effect	t:
	ConvF Y	7.36	extrapolated		Alpha	0.29
	ConvF Z	7.36	extrapolated		Depth	2.72
Head	900 MH	Z	$e_{r} = 42 \pm 5\%$	S :	= 0.97 ± 10% mh	o/m
	ConvF X	6.83	± 7% (k=2)		Boundary effect	t:
	ConvF Y	6.83	±7% (k=2)		Alpha	0.37
	ConvF Z	6.83	± 7% (k=2)		Depth	2.48
Head	1500 MH	Z	$e_r = 40.4 \pm 5\%$	S :	= 1.23 ± 10% mh	o/m
	ConvF X	6.13	interpolated		Boundary effect	t:
	ConvF Y	6.13	interpolated		Alpha	0.47
	ConvF Z	6.13	interpolated		Depth	2.17
Head	1800 MH	Z	$\mathbf{e}_{r} = 40 \pm 5\%$	S =	= 1.40 ± 10% mh	o/m
	ConvF X	5.78	± 7% (k=2)		Boundary effect	t:
	ConvF Y	5.78	± 7% (k=2)		Alpha	0.53
	ConvF Z	5.78	± 7% (k=2)		Depth	2.01
Sensor	Offset					
	Probe Tip to Se	ensor Co	enter	2.7	mm	

Optical Surface Detection 1.2 ± 0.2

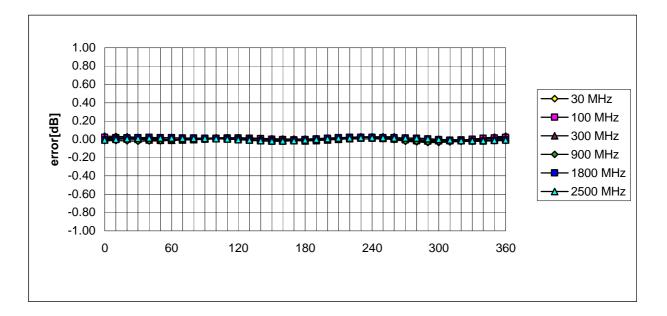
mm



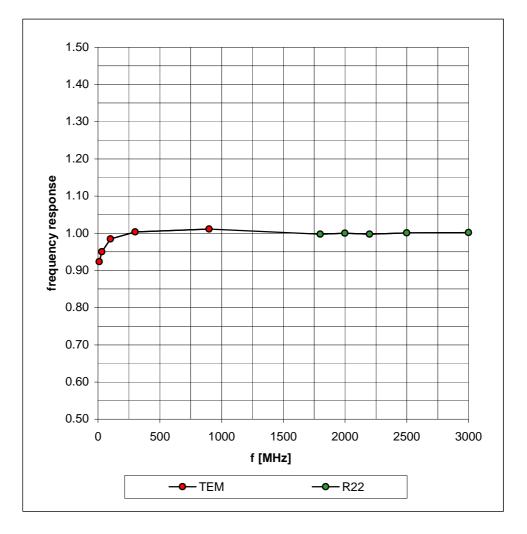
Receiving Pattern (f), $q = 0^{\circ}$



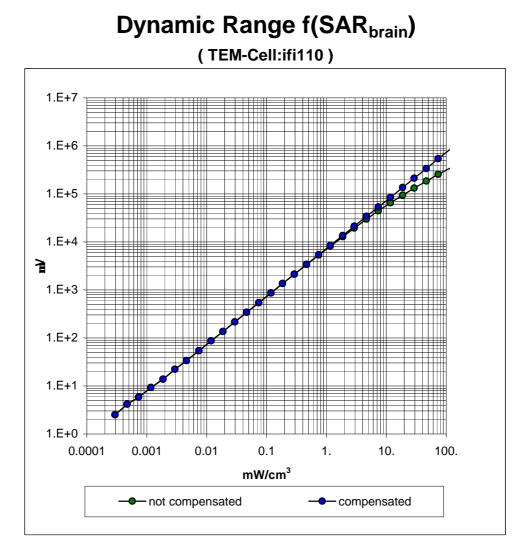
Isotropy Error (f), $q = 0^{\circ}$

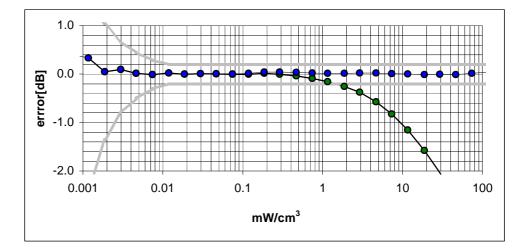


Frequency Response of E-Field

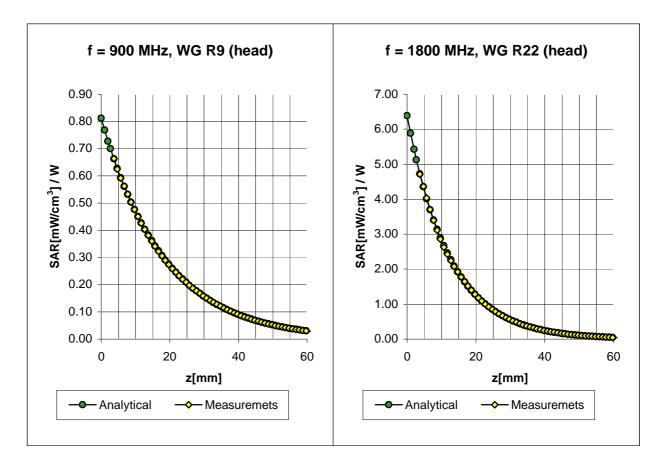


(TEM-Cell:ifi110, Waveguide R22)





ET3DV6 SN:1590



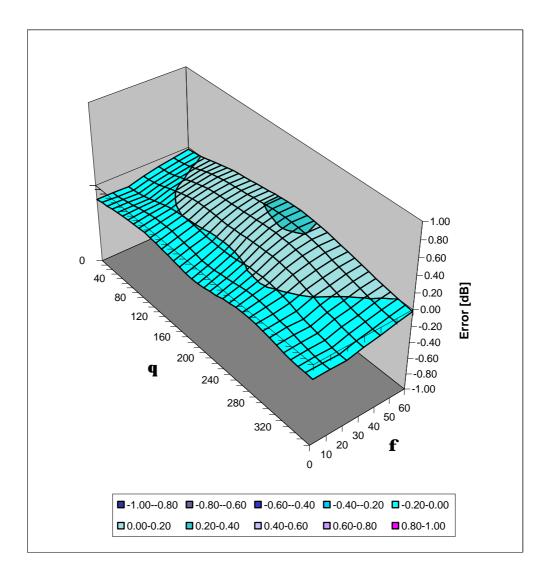
Conversion Factor Assessment

Head	900 MI	Hz	$e_r = 42 \pm 5\%$	s = 0.97 ± 10% mho/r	n
	ConvF X ConvF Y	6.83 ± 7 6.83 ± 7	X Y	Boundary effect: Alpha 0	0.37
	ConvF Z	6.83 ± 7		·	.48
Head	1800 MI	Hz	$e_{r} = 40 \pm 5\%$	s = 1.40 ± 10% mho/ı	n
	ConvF X	5.78 ± 7	7% (k=2)	Boundary effect:	
	ConvF Y	5.78 ± 7	′% (k=2)	Alpha 0	.53
	ConvF Z	5.78 ± 7	7% (k=2)	Depth 2	2.01

ET3DV6 SN:1590

Deviation from Isotropy in HSL

Error (qf), f = 900 MHz



APPENDIX D - SAR TEST SETUP PHOTOGRAPHS

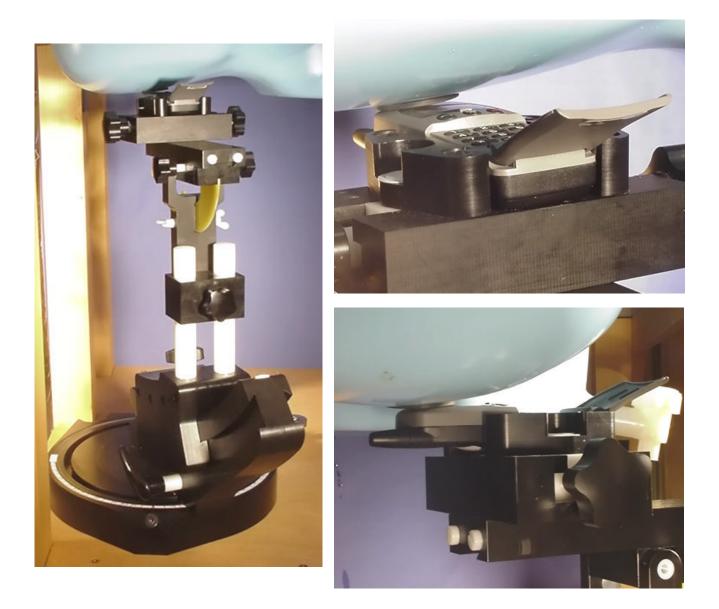
Test Report S/N: 081001-15106Y Date(s) of Tests: August 15, 2001 FCC SAR Measurements

HEAD SAR TEST SETUP PHOTOGRAPHS Left Section – Cheek/Touch Position



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HEAD SAR TEST SETUP PHOTOGRAPHS Left Section – Ear/Tilt Position



Test Report S/N: 081001-15106Y Date(s) of Tests: August 15, 2001 FCC SAR Measurements

HEAD SAR TEST SETUP PHOTOGRAPHS Right Section – Cheek/Touch Position



Test Report S/N: 081001-15106Y Date(s) of Tests: August 15, 2001 FCC SAR Measurements

HEAD SAR TEST SETUP PHOTOGRAPHS Right Section – Ear/Tilt Position



BODY SAR TEST SETUP PHOTOGRAPHS 0.0cm Separation Distance



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