

Prüfbericht-Nr.:	CN25605K 001	Auftrags-Nr.:	48277457	Seite 1 von 30
Test report no.:		Order no.:		Page 1 of 30
Kunden-Referenz-Nr.:	N/A	Auftragsdatum:	2025-05-28	
Client reference no.:		Order date:		
Auftraggeber:	Dot Origin Ltd			
Client:	Unit 7 Coopers Place, Combe Lane, Wormley, Godalming, GU8 5SZ, UK			
Prüfgegenstand:	VTAP25			
Test item:				
Bezeichnung / Typ-Nr.:	VTAP25			
Identification / Type no.:				
Auftrags-Inhalt:	Test Report for FCC SAR			
Order content:				
Prüfgrundlage:	FCC 47 CFR §2.1093			
Test specification:	IEEE Std 1528-2013			
	IEC/IEEE 62209-1528:2020			
	Published RF exposure KDB procedures			
Wareneingangsdatum:	2025-06-13			
Date of sample receipt:				
Prüfmuster-Nr.:	A004019928-001			
Test sample no.:				
Prüfzeitraum:	2025-07-18 - 2025-07-22			
Testing period:				
Ort der Prüfung:	EMC/RF Taipei Testing Site			
Place of testing:				
Prüflaboratorium:	Taipei Testing Laboratories			
Testing laboratory:				
Prüfergebnis*:	Pass			
Test result*:				
zusammengestellt von: compiled by:		Ginger Chiang	genehmigt von: authorized by:	Morrison Huang
Datum: Date: 2025-07-23		Ginger Chiang	Ausstellungsdatum: Issue date: 2025-07-23	Morrison Huang
Stellung / Position: Position:		Project Engineer	Stellung / Position:	Project Engineer
Sonstiges / Other:				
Zustand des Prüfgegenstandes bei Anlieferung: Condition of the test item at delivery:		Prüfmuster vollständig und unbeschädigt Test item complete and undamaged		
* Legende: 1 = sehr gut 2 = gut 3 = befriedigend 4 = ausreichend 5 = mangelhaft P(ass) = entspricht o.g. Prüfgrundlage(n) F(all) = entspricht nicht o.g. Prüfgrundlage(n) N/A = nicht anwendbar N/T = nicht getestet * Legend: 1 = very good 2 = good 3 = satisfactory 4 = sufficient 5 = poor P(ass) = passed a.m. test specification(s) F(all) = failed a.m. test specification(s) N/A = not applicable N/T = not tested				
Dieser Prüfbericht bezieht sich nur auf das o.g. Prüfmuster und darf ohne Genehmigung der Prüfstelle nicht auszugsweise vervielfältigt werden. Dieser Bericht berechtigt nicht zur Verwendung eines Prüfzeichens. <i>This test report only relates to the a. m. test sample. Without permission of the test center this test report is not permitted to be duplicated in extracts. This test report does not entitle to carry any test mark.</i>				

Prüfbericht - Nr.: CN25605K 001
Test Report No.

Seite 2 von 30
Page 2 of 30

1	<p>Alle eingesetzten Prüfmittel waren zum angegebenen Prüfzeitraum gemäß eines festgelegten Kalibrierungsprogramms unseres Prüfhauses kalibriert. Sie entsprechen den in den Prüfprogrammen hinterlegten Anforderungen. Die Rückverfolgbarkeit der eingesetzten Prüfmittel ist durch die Einhaltung der Regelungen unseres Managementsystems gegeben. Detaillierte Informationen bezüglich Prüfkonditionen, Prüfequipment und Messunsicherheiten sind im Prüflabor vorhanden und können auf Wunsch bereitgestellt werden.</p>
	<p><i>The equipment used during the specified testing period was calibrated according to our test laboratory calibration program. The equipment fulfils the requirements included in the relevant standards. The traceability of the test equipment used is ensured by compliance with the regulations of our management system.</i></p> <p><i>Detailed information regarding test conditions, equipment and measurement uncertainty is available in the test laboratory and could be provided on request.</i></p>
2	<p>Wie vertraglich vereinbart, wurde dieses Dokument nur digital unterzeichnet. Der TÜV Rheinland hat nicht überprüft, welche rechtlichen oder sonstigen diesbezüglichen Anforderungen für dieses Dokument gelten. Diese Überprüfung liegt in der Verantwortung des Benutzers dieses Dokuments. Auf Verlangen des Kunden kann der TÜV Rheinland die Gültigkeit der digitalen Signatur durch ein gesondertes Dokument bestätigen. Diese Anfrage ist an unseren Vertrieb zu richten. Eine Umweltgebühr für einen solchen zusätzlichen Service wird erhoben. Informationen zur Verifizierung der Authentizität unserer Dokumente erhalten Sie auf folgender Webseite: go.tuv.com/digital-signature</p> <p><i>As contractually agreed, this document has been signed digitally only. TUV Rheinland has not verified and unable to verify which legal or other pertaining requirements are applicable for this document. Such verification is within the responsibility of the user of this document. Upon request by its client, TUV Rheinland can confirm the validity of the digital signature by a separate document. Such request shall be addressed to our Sales department. An environmental fee for such additional service will be charged. For information on verifying the authenticity of our documents, please visit the following website: go.tuv.com/digital-signature</i></p>
3	<p>Prüfklausel mit der Note * wurden an qualifizierte Unterauftragnehmer vergeben und sind unter der jeweiligen Prüfklausel des Berichts beschrieben. Abweichungen von Prüfspezifikation(en) oder Kundenanforderungen sind in der jeweiligen Prüfklausel im Bericht aufgeführt.</p> <p><i>Test clauses with remark of * are subcontracted to qualified subcontractors and described under the respective test clause in the report.</i></p> <p><i>Deviations of testing specification(s) or customer requirements are listed in specific test clause in the report.</i></p>
4	<p>Die Entscheidungsregel für Konformitätserklärungen basierend auf numerischen Messergebnissen in diesem Prüfbericht basiert auf der "Null-Grenzwert-Regel" und der "Einfachen Akzeptanz" gemäß ILAC G8:2019 und IEC Guide 115:2023, es sei denn, in der auf Seite 1 dieses Berichts genannten angewandten Norm ist etwas anderes festgelegt oder vom Kunden gewünscht. Dies bedeutet, dass die Messunsicherheit nicht berücksichtigt wird und daher auch nicht im Prüfbericht angegeben wird. Zu weiteren Informationen bezüglich des Risikos durch diese Entscheidungsregel siehe ILAC G8:2019.</p> <p><i>The decision rule for statements of conformity, based on numerical measurement results, in this test report is based on the "Zero Guard Band Rule" and "Simple Acceptance" in accordance with ILAC G8:2019 and IEC Guide 115:2023, unless otherwise specified in the applied standard mentioned on Page 1 of this report or requested by the customer. This means that measurement uncertainty is not taken in account and hence also not declared in the test report. For additional information to the resulting risk based of this decision rule please refer to ILAC G8:2019.</i></p>

CONTENTS

HISTORY OF THIS TEST REPORT	5
1. GENERAL INFORMATION	6
1.1 STATEMENT OF COMPLIANCE	6
1.2 EQUIPMENT UNDER TEST (EUT) INFORMATION	7
1.2.1 GENERAL INFORMATION	7
1.2.2 WIRELESS TECHNOLOGIES	7
2. TEST SITES	8
2.1 TEST LABORATORY	8
2.2 TEST FACILITIES	8
2.3 LIST OF TEST AND MEASUREMENT INSTRUMENTS	9
3. MEASUREMENT UNCERTAINTY	10
4. TEST SPECIFICATION, METHODS AND PROCEDURES	12
5. RF EXPOSURE LIMITS	13
5.1 UNCONTROLLED ENVIRONMENT	13
5.2 CONTROLLED ENVIRONMENT	13
6. SAR MEASUREMENT SYSTEM	14
6.1 DEFINITION OF SPECIFIC ABSORPTION RATE (SAR)	14
6.2 SPEAG DASY SYSTEM	14
6.2.1 ROBOT	15
6.2.2 PROBES	16
6.2.3 DATA ACQUISITION ELECTRONICS (DAE)	16
6.2.4 PHANTOMS	16
6.2.5 DEVICE HOLDER	17
6.2.6 SYSTEM VALIDATION Dipoles	17
6.2.7 TISSUE SIMULATING LIQUIDS	18
7. SAR MEASUREMENT PROCEDURE	20
7.1 AREA & ZOOM SCAN PROCEDURE	20
7.2 VOLUME SCAN PROCEDURE	20
7.3 POWER DRIFT MONITORING	21
7.4 SPATIAL PEAK SAR EVALUATION	21
7.5 SAR AVERAGED METHODS	21
8. SAR MEASUREMENT EVALUATION	22
8.1 EUT CONFIGURATION AND SETTING	22
8.2 EUT TESTING POSITION	23
8.2.1 BODY EXPOSURE CONDITIONS	23
8.2.2 ANTENNA LOCATION	23
8.3 SIMULTANEOUS TRANSMISSION POSSIBILITIES	24

Prüfbericht - Nr.: CN25605K 001
Test Report No.

Seite 4 von 30
Page 4 of 30

8.4	TISSUE VERIFICATION	25
8.5	SYSTEM VALIDATION.....	26
	SYSTEM CHECK PROCEDURE.....	26
8.6	SYSTEM VERIFICATION.....	27
8.7	MAXIMUM OUTPUT POWER.....	28
8.7.1	MEASURED CONDUCTED POWER RESULT	28
8.8	SAR TESTING RESULTS.....	29
8.8.1	SAR RESULTS FOR BODY EXPOSURE CONDITION (SEPARATION DISTANCE IS 0.5CM GAP)29	29
8.8.2	DUT HOLDER PERTURBATIONS.....	29
9.	APPENDIXES	30

APPENDIX A – SAR PLOTS OF SYSTEM VERIFICATION

APPENDIX B – SAR PLOTS OF SAR MEASUREMENT

APPENDIX C – CALIBRATION CERTIFICATE FOR PROBE AND DIPOLE

APPENDIX D – PHOTOGRAPHS OF THE TEST SET-UP

Prüfbericht - Nr.: **CN25605K 001**
Test Report No.

Seite 5 von 30
Page 5 of 30

HISTORY OF THIS TEST REPORT

Report No.	Description	Date Issued
CN25605K 001	Original Release	2025-07-23

1. General Information

1.1 Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for the EUT are as follows:

Operating Mode	Highest Reported Module SAR _{1g} (0.5 cm Gap) (W/kg)
NFC	0.094

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6W/kg as averaged over any 1 gram of tissue; 10-gram SAR for Product Specific 10g SAR, limit: 4.0W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

Prüfbericht - Nr.: **CN25605K 001**
Test Report No.

Seite 7 von 30
Page 7 of 30

1.2 Equipment Under Test (EUT) Information

1.2.1 General Information

EUT Type	VTAP25
Model Name	VTAP25
FCC ID	2A282-VTAP25
Antenna Information	PCB Antenna
EUT Stage	Identical Prototype

1.2.2 Wireless Technologies

Tx Frequency Bands	13.56 MHz
Uplink Modulations	ASK

Prüfbericht - Nr.: **CN25605K 001**
Test Report No.

Seite 8 von 30
Page 8 of 30

2. Test Sites

2.1 Test Laboratory

Taipei Testing Laboratories

11F., No. 758, Sec. 4, Bade Rd., Songshan Dist., Taipei City 105 Taiwan (R.O.C.)

2.2 Test Facilities

Taipei Testing Laboratories

No. 458-18, Sec. 2, Fenliao Rd., Linkou Dist., New Taipei City 244 Taiwan (R.O.C.)

The tests at the test sites have been conducted under the supervision of a TÜV engineer.

Prüfbericht - Nr.: **CN25605K 001**
Test Report No.

Seite 9 von 30
Page 9 of 30

2.3 List of Test and Measurement Instruments

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
E-field probes	SPEAG	EX3DV4	7400	2025/5/21	1 Year
Data Acquisition Electronics	SPEAG	DAE4	855	2025/4/23	1 Year
13M System Validation Kit	SPEAG	CLA13	1047	2024/10/7	1 Year
ENA	Agilent	E5080A	MY55200677	2025/1/17	1 Year
Power Meter	Anritsu	ML2495A	1901008	2025/2/26	1 Year
Power Sensor	Anritsu	MA2411B	1725269	2025/2/26	1 Year
Power Sensor	R&S	NRP33S	101622	2025/3/19	1 Year
Signal Analyzer	R&S	FSV40	101512	2025/2/26	1 Year
Signal Generator	R&S	SMB100A03	181336	2025/6/6	1 Year
Digital Thermometer	Testo	608-H1	45207430	2024/11/22	1 Year
Directional coupler	Fairview Microwave	FMCP1025-20	A000553136- 001	N/A	N/A
Power Amplifier	EMCI	EMC2830P	980352	N/A	N/A
Power Amplifier	mini-circuits	ZHL-42W	SN002101809	N/A	N/A
ELI Phantom	SPEAG	QDOVA002AA	TP-1153	N/A	N/A

3. Measurement Uncertainty

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacturer's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor(a)	$1/k(b)$	$1/\sqrt{3}$	$1/\sqrt{6}$	$1/\sqrt{2}$

- (a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity
- (b) k is the coverage factor

Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.

Prüfbericht - Nr.: CN25605K 001
Test Report No.
Seite 11 von 30
Page 11 of 30

SAR Uncertainty Budget According to IEC/IEEE 62209-1528 (Frequency band: 4MHz - 10GHz range)								
Symbol	Input quantity X_i (source of uncertainty)	Unc. Value	Prob. Dist.	Div.	c_i (1g)	c_i (10g)	Std.Unc. (1g) (±%)	Std.Unc. (10g) (±%)
Measurement system errors								
CF	Probe calibration(±%) (K=1)	9.3	N	2	1	1	4.65	4.65
CF_{drift}	Probe calibration drift(±%)	1.0	N	1	1	1	1.0	1.0
LIN	Probe linearity and detection limit(±%)	4.7	R	1.732	1	1	2.7	2.7
BBS	Broadband signal(±%)	3.0	N	1	1	1	3.0	3.0
ISO	Probe isotropy(±%)	7.6	R	2	1	1	3.8	3.8
DAE	Other probe and data acquisition errors(±%)	0.3	N	1.732	1	1	0.17	0.17
AMB	RF ambient and noise(±%)	1.8	N	1	1	1	1.8	1.8
Δ_{xyz}	Probe positioning errors(± mm)	0.20	N	1	0.33	0.33	0.07	0.07
DAT	Data processing errors(±%)	3.5	N	1	1	1	3.5	3.5
Phantom and device (DUT or validation antenna) errors								
$LIQ(\sigma)$	Conductivity (meas.) DAK (±%)	3.5	N	1	0.78	0.71	2.73	2.49
$LIQ(T_c)$	Conductivity (temp.)(±%)	3	R	1	0.78	0.71	1.35	1.23
EPS	Phantom Permittivity(±%)	14	R	1.732	0.5	0.5	4.0	4.0
DIS	Distance DUT - TSL(±%)	2	N	1	2	2	4.0	4.0
D_{xyz}	Device Positioning(±%)	2	N	1	1	1	2.2	2.2
H	Device Holder(±%)	3.4	N	1	1	1	3.2	3.2
MOD	DUT Modulation(±%)	2.4	R	1.732	1	1	1.39	1.39
TAS	Time-average SAR(±%)	2.4	R	1.732	1	1	1.39	1.39
RF_{drift}	DUT drift(±%)	5	N	1	1	1	5.0	5.0
VAL	Val Antenna Unc.(±%)	0	N	1	1	1	0.0	0.0
P_{in}	Unc. Input Power(±%)	0	N	1	1	1	0.0	0.0
Corrections to the SAR result								
$C(\epsilon', \sigma)$	Deviation to Target(±%)	1.9	N	1	1	0.84	1.9	1.6
$C(R)$	SAR scaling(±%)	0	R	$\sqrt{3}$	1	1	0.0	0.0
$u(\Delta SAR)$	Combined uncertainty						12.57	12.47
	Coverage Factor for 95%						K=2	K=2
U	Expanded uncertainty					$U =$	±25.14	±24.94

Uncertainty budget for frequency range 4 MHz to 10 GHz

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions

4. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR §2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure KDB procedures & manufacturer KDB inquiries:

- KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- KDB 865664 D02 RF Exposure Reporting v01r02
- KDB 447498 D04 Interim General RF Exposure Guidance v01

In addition to the above, the following information was used:

- [TCB workshop](#) October, 2014; Page 36, RF Exposure Procedures Update (Overlapping LTE Bands)
- [TCB workshop](#) October, 2014; Page 37, LTE Considerations (LTE Band 41 Test Channels)

5. RF Exposure Limits

5.1 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.

5.2 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. The 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.

Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is average over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

6. SAR Measurement System

6.1 Definition of Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

$$SAR = \frac{d}{dt} \left(\frac{dW}{dm} \right) = \frac{d}{dt} \left(\frac{dW}{\rho dv} \right)$$

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

SAR measurement can be related to the electrical field in the tissue by

$$SAR = \frac{\sigma |E|^2}{\rho}$$

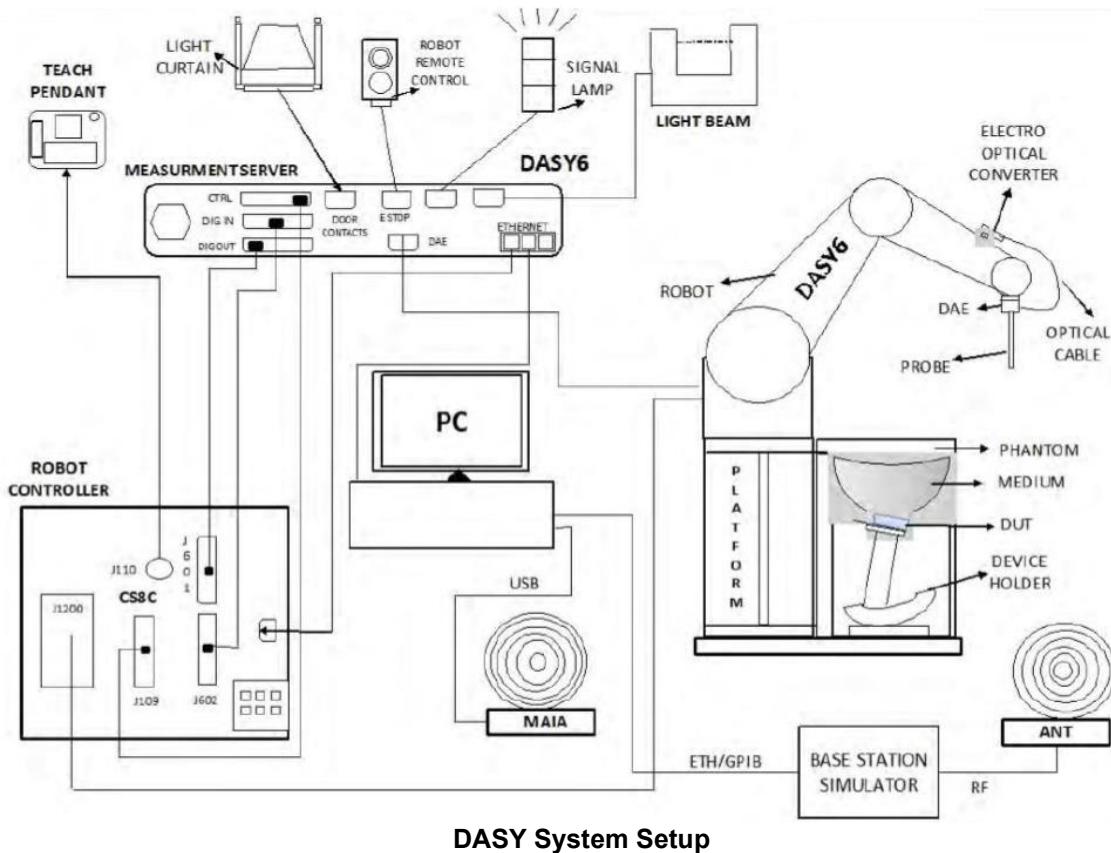
Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

6.2 SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY6 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC.

Prüfbericht - Nr.: CN25605K 001
Test Report No.

Seite 15 von 30
Page 15 of 30



6.2.1 Robot

The DASY system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY6: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ± 0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)



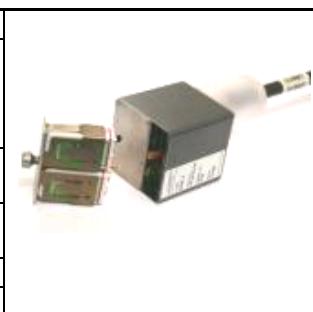
Prüfbericht - Nr.: CN25605K 001
Test Report No.
Seite 16 von 30
Page 16 of 30
6.2.2 Probes

The SAR measurement is conducted with the dosimetric probe. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

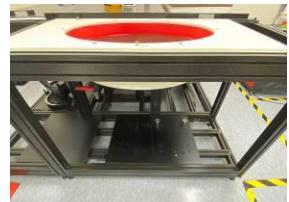
The SAR measurement is conducted with the dosimetric probe. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

Model	EX3DV4	
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	4 MHz to 10 GHz Linearity: ± 0.2 dB	
Directivity	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μ W/g to 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)	
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

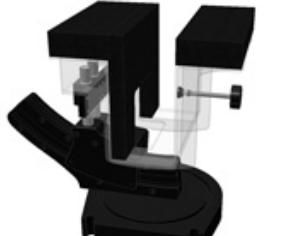
6.2.3 Data Acquisition Electronics (DAE)

Model	DAE4	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
Input Offset Voltage	$< 5\mu$ V (with auto zero)	
Input Bias Current	< 50 fA	
Dimensions	60 x 60 x 68 mm	

6.2.4 Phantoms

Model	ELI	
Construction	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 4 MHz to 10 GHz. ELI is fully compatible with the IEC/IEEE 62209-1528 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	

Prüfbericht - Nr.: CN25605K 001
Test Report No.
Seite 17 von 30
Page 17 of 30
6.2.5 Device Holder

Model	Mounting Device	
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
Material	POM	
Model	Laptop Extensions Kit	
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC/IEEE 62209-1528 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
Material	POM, Acrylic glass, Foam	

6.2.6 System Validation Dipoles

Model	V&V CLA-13 for SAR System	
Construction	Confined Loop Antennas (CLA) are system validation antennas used to perform system checks with tissue simulating media at 6 – 220 MHz prior to specific absorption rate evaluations. The source is a resonant loop antenna integrated in a metallic structure to isolate the resonant structure from the environment.	
Frequency	13 MHz	
Return Loss	> 10 dB	
Power Capability	> 10 W	

6.2.7 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed.

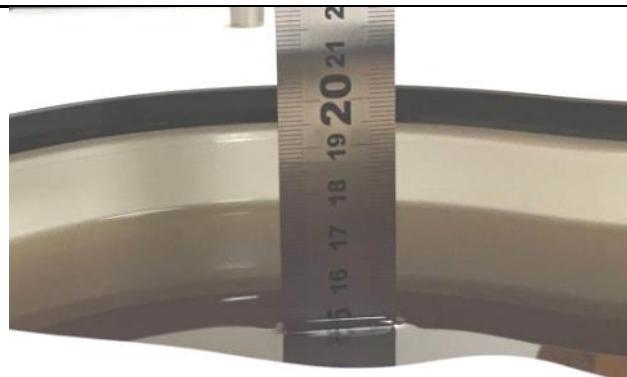


Photo of Liquid Height for Head Position

The dielectric properties of the head tissue simulating liquids are defined in IEEE 1528 Appendix A.

The workshop effective February 19, 2019 , FCC has permitted the use of single head tissue simulating liquid specified in IEC 62209 1 for all SAR tests.

The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

Prüfbericht - Nr.: CN25605K 001
Test Report No.

Seite 19 von 30
Page 19 of 30

Targets of Tissue Simulating Liquid

Frequency (MHz)	Target Permittivity	Range of ±5%	Target Conductivity	Range of ±5%
For Head				
13	55.0	52.3 ~ 57.8	0.75	0.71 ~ 0.79
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53
6500	34.5	32.8 ~ 36.2	6.07	6.04 ~ 6.11

7. SAR Measurement Procedure

According to the SAR test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

The SAR measurement procedures for each of test conditions are as follows:

- (a) Make EUT to transmit maximum output power
- (b) Measure conducted output power through RF cable
- (c) Place the EUT in the specific position of phantom
- (d) Perform SAR testing steps on the DASY system
- (e) Record the SAR value

7.1 Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664 D01, the resolution for Area and Zoom scan is specified in the table below.

Items	≤ 2GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan ($\Delta x, \Delta y$)	≤ 15 mm	≤ 12 mm	≤ 12 mm	≤ 10 mm	≤ 10 mm
Zoom Scan ($\Delta x, \Delta y$)	≤ 8 mm	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 4 mm
Zoom Scan (Δz)	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 3 mm	≤ 2 mm
Zoom Scan Volume	≥ 30 mm	≥ 30 mm	≥ 28 mm	≥ 25 mm	≥ 22 mm

Note:

When zoom scan is required and report SAR is $\leq 1.4 \text{ W/kg}$, the zoom scan resolution of $\Delta x / \Delta y$ (2-3 GHz): $\leq 8 \text{ mm}$, 3-4 GHz: $\leq 7 \text{ mm}$, 4-6 GHz: $\leq 5 \text{ mm}$) may be applied.

7.2 Volume Scan Procedure

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

7.3 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drift more than 5%, the SAR will be retested.

7.4 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values form the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

7.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

8. SAR Measurement Evaluation

8.1 EUT Configuration and Setting

<Considerations Related to NFC for Setup and Testing>

Refer KDB 447498 D04 section 4.2.2, A module test separation distance not exceeding 5 mm shall be applied to determine SAR-based test exemption or SAR values.

The NFC module cannot control signal transmission through software, so the reader card is fixed under the DUT.

NFC 13.56MHz antenna port is not available on the device to support conducted power measurement, therefore the measured results are referred to as reported SAR.

NFC module SAR test tissue-simulating liquid parameter: refer to IEC/IEEE 62209-1528 2020.

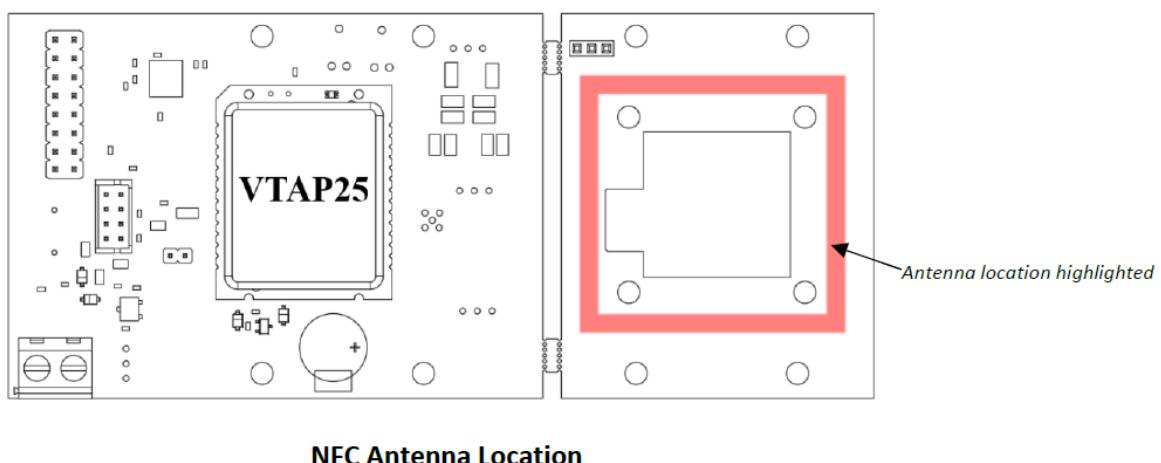
8.2 EUT Testing Position

The EUT is tested for SAR compliance in head, body-worn accessory and other use configurations described in the following subsections.

8.2.1 Body Exposure Conditions

This EUT was tested for two surfaces of the EUT as Front Face, Back Face, and the separation distance between this EUT and phantom is 5 mm.

8.2.2 Antenna Location



8.3 Simultaneous Transmission Possibilities

There is no simultaneous transmission configuration in this device.

Prüfbericht - Nr.: CN25605K 001
Test Report No.
Seite 25 von 30
Page 25 of 30

8.4 Tissue Verification

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectric parameter are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within $\pm 5\%$ of the target values.

The following materials are used for producing the tissue-equivalent materials.

Recipes of Tissue Simulating Liquid

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

Salt: 99+% Pure Sodium Chloride; Sugar: 98+% Pure Sucrose; Water: De-ionized, 16M +resistivity

HEC: Hydroxyethyl Cellulose; DGBE: 99+% Di(ethylene glycol) butyl ether, [2-(2-butoxyethoxy) ethanol]; Triton X-100 (ultra pure): Polyethylene glycol mono [4-(1,1,3,3-tetramethylbutyl) phenyl]ether.

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Measured Conductivity (σ)	Measured Permittivity (ϵ_r)	Target Conductivity (σ)	Target Permittivity (ϵ_r)	Conductivity Deviation (%)	Permittivity Deviation (%)
2025/7/18	Head	13	23.7	22.9	0.7511	55.29	0.15	0.527

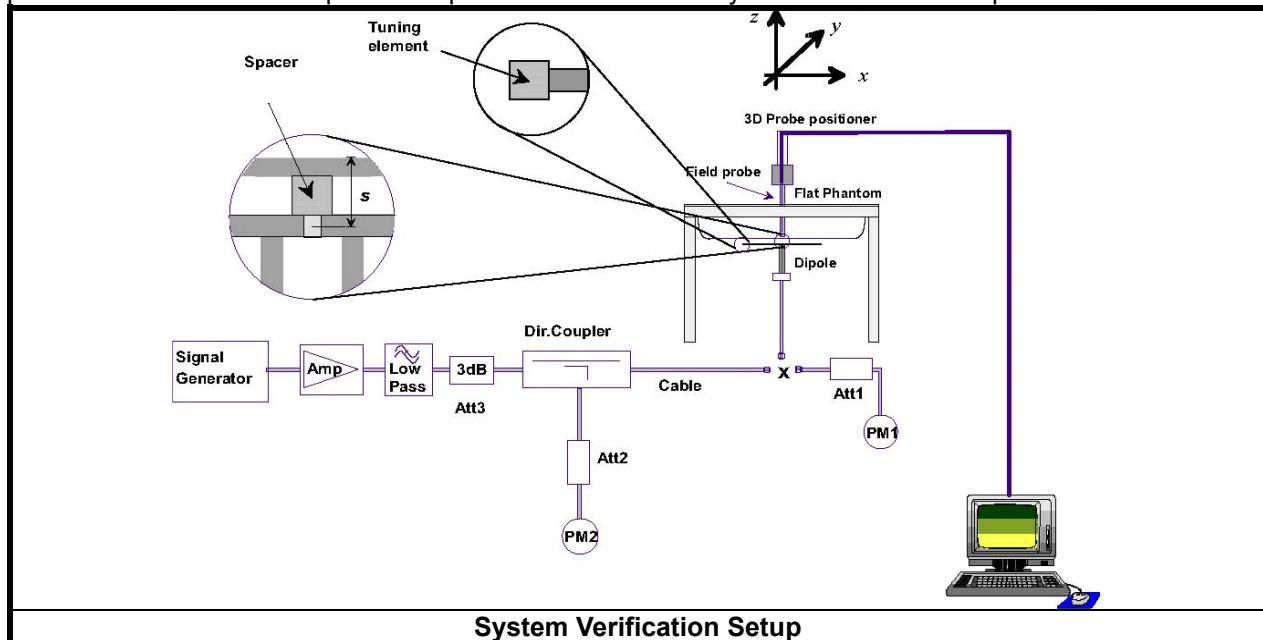
Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within $\pm 5\%$ of the target values. Liquid temperature during the SAR testing must be within $\pm 2\text{ }^\circ\text{C}$.

8.5 System Validation

System check Procedure

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.



The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 3 GHz, 100 mW is used for 3.5 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

Prüfbericht - Nr.: CN25605K 001
Test Report No.

Seite 27 von 30
Page 27 of 30

8.6 System Verification

The measuring results for system check are shown as below.

Test Date	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
2025/7/18	13	0.0528	0.528	0.506	4.35	1047	7400	855

Note:

Output power is 100mW (20dBm).

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

8.7 Maximum Output Power

8.7.1 Measured Conducted Power Result

NFC 13.56MHz antenna port is not available on the device to support conducted power measurement, therefore the measured results are referred to as reported SAR.

Prüfbericht - Nr.: CN25605K 001
Test Report No.Seite 29 von 30
Page 29 of 30

8.8 SAR Testing Results

8.8.1 SAR Results for Body Exposure Condition (Separation Distance is 0.5cm Gap)

Plot No.	Band	Mode	Test Position	Gap (mm)	Frequency (MHz)	Power Drift (dB)	Measured SAR-1g (W/kg)
1	NFC	DC 3.3V	Front Face	5mm	13.56	-0.05	0.094
	NFC	DC 3.3V	Back Face	5mm	13.56	-0.11	0.076
	NFC	USB 5V	Front Face	5mm	13.56	-0.19	0.083
	NFC	USB 5V	Back Face	5mm	13.56	-0.11	0.092

Test Engineer: Ginger Chiang

8.8.2 DUT Holder Perturbations

Depending on antenna locations, buttons locations on phones or device, form factor (e.g. dongles etc.), the measured SAR could be influenced by the relative positions of the test device and its holder.

When the highest reported SAR of an antenna is > 1.2 W/kg, holder perturbation verification is required, using the highest SAR configuration among all applicable frequency bands with and without the device holder.

All the measured SAR are less than 1.2 W/kg, so the holder perturbation verification is not required.

Prüfbericht - Nr.: **CN25605K 001**
Test Report No.

Seite 30 von 30
Page 30 of 30

9. Appendixes

Appendix A – SAR Plots of System Verification

Appendix B – SAR Plots of SAR Measurement

Appendix C – Calibration Certificate for Probe and Dipole

Appendix D – Photographs of the Test Set-Up

---END---