SAR Compliance Test Report

Date of Report	25/02/2022	**Client's Contact person:**	Alex Aalmers
Number of pages:	26	**Responsible Test engineer:**	Ilari Kinnunen
Testing laboratory:	**Verkotan Oy** Elektroniikkatie 17 90590 Oulu Finland	**Client:**	**PNE Benelux BV** Industrieweg Oost 21 6662 NE Elst Netherlands
Tested device	Skinly3		
Related reports:	-		
Testing has been carried out in accordance with:	**47CFR §2.1093** Radiofrequency Radiation Exposure Evaluation: Portable Devices **FCC published RF exposure KDB procedures** **RSS-102, Issue 5** Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)		
Documentation:	The test report must always be reproduced in full; reproduction of an excerpt only is subject to written approval of the testing laboratory		
Test Results:	**The EUT complies with the requirements in respect of all parameters subject to the test.** The test results relate only to devices specified in this document		
Date and signatures:	25.02.2022 Miia Nurkkala Digitaalinen allekirjoittaja: Miia Nurkkala Päiväys: 2022.02.25 13:14:20 +02'00'		

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1. SUMMARY OF SAR TEST REPORT

1.1 Test Details

Equipment under Test (EUT):

Product:	Skinly3
Manufacturer:	Beiersdorf AG
Model:	Skinly3
Serial Number:	08926, 03276
FCC ID:	2A32B-SKINLY
ISED ID:	28056-SKINLY
Hardware Version:	3.7
DUT Number:	21645, 21646
Battery Type used in testing:	Integrated battery
State of the Sample	Prototype

Testing information:

Testing performed:	21.02.2022 – 22.02.2022
Notes:	-
Document history:	-
Document ID:	FCC SAR Report_Skinly3_ID5387_25022022.docx
Temperature °C	22±2 / Controlled
Humidity RH%	30±20 / Controlled
Measurement performed by:	Ilari Kinnunen
FCC Test Firm Designation Number	FI00005
ISED Company Number	22218

1.2 Maximum Results

The maximum reported* SAR values for Body-worn configuration for transmitting systems are shown in a table below. The device conforms to the requirements of the standards when the maximum reported SAR value is less than or equal to the limit. The SAR limit specified in FCC 47 CFR part 2 (2.1093) and Health Canada's RF exposure guideline, Safety Code 6 for Body-worn SAR_{1g} is 1.6 W/kg.

1.2.1 Standalone SAR

System	Highest Reported* SAR_{1g}(W/kg) in Body-Worn Condition, 0 mm separation distance	Result
WLAN 2.4 GHz	**0.20**	**PASS**

*Reported SAR Values are scaled to upper limit of power tolerance.

1.2.2 Maximum Drift

Maximum Drift During Measurements	-0.58dB*

*Larger than 5% drifts included to scaling factors

1.2.3 Measurement Uncertainty

Expanded Uncertainty (k=2) 95 %	±22.1 %

2. DESCRIPTION OF THE DEVICE UNDER TEST (DUT)

The DUT is a skin quality measurement system that is able to take photos of the skin. The DUT has 2.4 GHz WLAN.

Device Category	Portable
Exposure Environment	General population, uncontrolled

2.1 Supported Frequency Bands and Operational Modes

TX Frequency bands	Modes of Operation	Transmitter Frequency Range (MHz)
	2.4 GHz WLAN	2412-2462

3. OUTPUT POWER

3.1 Maximum specified conducted output power

From a Customer, including tune-up tolerance;

WLAN 2.4GHz	Max Output Power [dBm]
802.11b	15.0
802.11g	15.0
802.11n	15.0

3.2 Tested conducted power

WLAN 2.4 GHz:

Standard	Transmission mode	Data rate [Mbps]	Output power [dBm]		
			CH 1 2412	CH 6 2437	CH 11 2462
802.11b	DSSS	11	14.22	14.42	12.92

4. TEST EQUIPMENT

Dasy52 near field scanning system, manufactured by SPEAG was used for SAR testing. The test system consists of high precision robotics system (Staubli), robot controller, computer, near-field probe, probe alignment sensor, and a phantom containing the tissue equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location of maximum electromagnetic field.

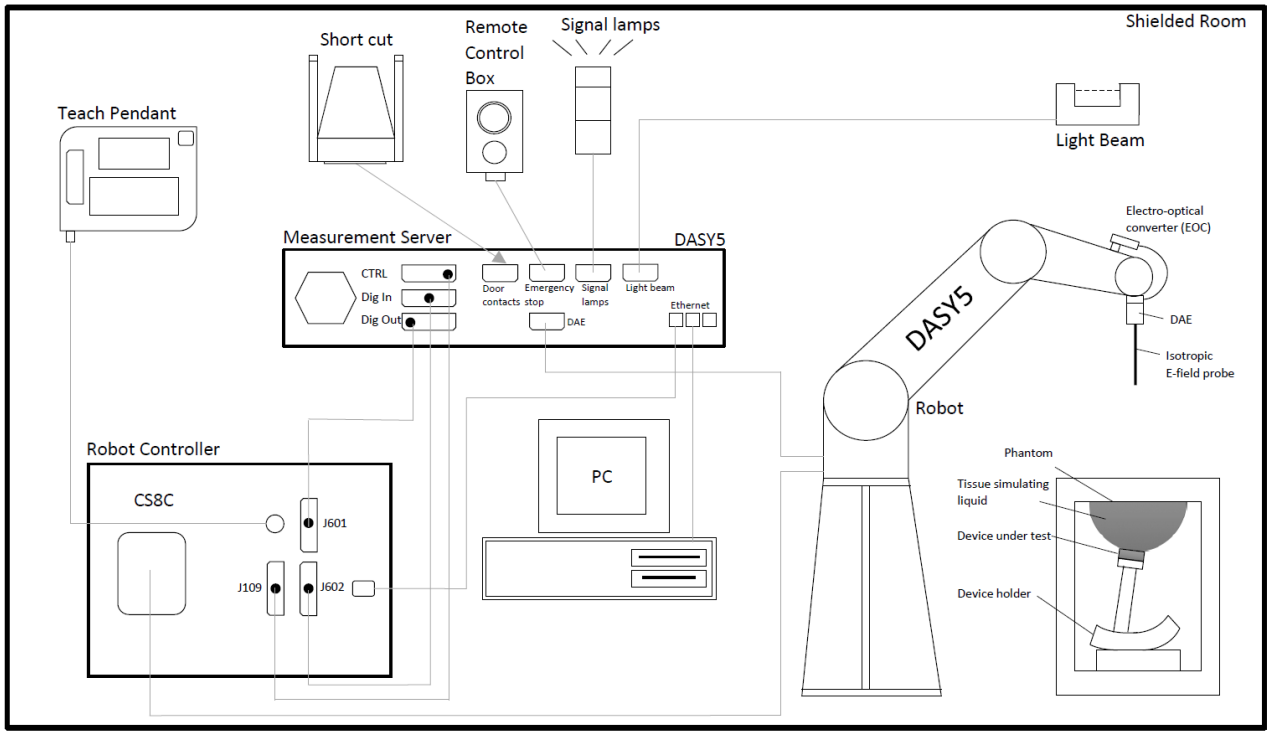


Figure 1 Schematic Laboratory Picture

4.1 Test Equipment List

Main used test system components are listed below. For full equipment list and calibration intervals, please contact the testing laboratory.

Test Equipment	Model	Serial Number	Calibration Date
DAE	DAE4	710	10.2021
Probe	EX3DV4	3892	04.2021
Dipole	D2450V2	758	03.2020
DASY5 Software	52.8.8.1258	-	NA
Signal Generator	Agilent E4438C	MY42082527	NA
Amplifier	Ophir 5163F	1022	NA
Power Sensor	R&S NRP-Z81	100792	06.2021
Power Sensor	Anritsu MA24105A	2102058	11.2021

Dipole calibration period supporting data:

		Measured on 09/2021			Calibrated		
Dipole and serial number	Frequency (MHz)	Return loss (dB)	Impedance (Ω)		Return loss (dB)	Impedance (Ω)	
D2450V2 - SN: 758	2450	-28.7	46.7	-1.3	-35	49.9	-0.5

4.1.1 Isotropic E-field Probe Type EX3DV4

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	Calibration certificate in Appendix D
Frequency	10 MHz to >6 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 100 mW/g, Linearity: ± 0.2 dB
Dimensions	Overall length: 330 mm Tip length: 10 mm Body diameter: 12 mm
Application	General dosimetry up to 6 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms

4.2 Phantom

ELI Phantom:

The phantom used in SAR tests was an ELI phantom, manufactured by SPEAG. ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. The phantom conforms to the requirements of IEEE 1528 and FCC published RF Exposure KDB Procedures.

4.3 Tissue Simulants

Recommended values for the dielectric parameters of the tissue simulants are given in IEEE 1528 and FCC published RF Exposure KDB Procedures. The dielectric parameters of the used tissue simulants were within ±10% of the recommended values. A liquid compensation algorithm was used in DASY5 with which measured peak average SAR values were corrected for the deviation of used liquid. Depth of the tissue simulant was at least 15.0 cm from the inner surface of the flat phantom. Tissue simulant consists of:

Head 600 – 6000 MHz tissue simulant liquid Ingredients
Deionized Water, oil, salt, emulsifiers

4.4 System Validation Status

Frequency [MHz]	Dipole Type / SN	Probe Type / SN	Calibrated Signal Type	DAE Unit / SN	Dielectric Constant ε	Conductivity, σ [S/m]	Validation Done
							Head tissue simulant
2450	D2450V2 / 729	EX3DV4 / 3892	CW	CW / DSSS	DAE 4 / 710	35.9	1.78

4.5 System Check

Date	Tissue Type	Tissue Temp. [°C]	Frequency [MHz]	Input Power	Measured SAR_{1g} [W/kg]	1 W Target SAR_{1g} [W/kg]	1 W Normalized SAR_{1g} [W/kg]	Deviation (%)	Plot #
21.2.2022	WB Head	22	2450	250	13.0	55.34	52.0	-6.0	1

4.5.1 Tissue Simulant Verification

				Target		Measured		Deviation	
Date	Tissue Type	Tissue Temp. [°C]	Frequency [MHz]	Dielectric Constant [ε]	Conductivity, σ [S/m]	Dielectric Constant [ε]	Conductivity, σ [S/m]	ε (%)	σ (%)
21.02.2022	WB Head	22	2450	39.2	1.80	39.6	1.88	1.1	4.4
21.02.2022	WB Head	22	2412	39.3	1.77	39.7	1.85	1.1	4.8
21.02.2022	WB Head	22	2437	39.2	1.79	39.6	1.87	1.1	4.6
21.02.2022	WB Head	22	2462	39.2	1.81	39.6	1.89	1.1	4.1

5. TEST PROCEDURE

Testing was carried out in accordance with FCC KDB Publications 447498 D01, 248227 D01 and Industry Canada RSS-102.

A control software was used to set the DUT to transmit at maximum power.

The WLAN transmission modes for testing were selected according to power, largest channel bandwidth configuration, lowest order modulation and lowest data rate. 2.4GHz WLAN was tested with 802.11b standard with data rate of 11Mbps. The conducted power was verified to not have significant difference between 11Mbps and 1Mbps.

5.1 Test Positions

5.1.1 Body-Worn Configuration, 0 mm separation

The device was placed on the device holder and lifted towards the phantom until the distance between the phantom and the device was 0mm. Testing was done on front, back, top and the camera side of the DUT. Photos of the test positions are presented in appendix A.

5.2 Scan Procedures

First, area scans were used for determination of the field distribution. Next, a zoom scan was performed around the highest E-field value to determine the averaged SAR value. Drift was determined by measuring the same point at the start of the area scan and again at the end of the zoom scan.

5.3 SAR Averaging Methods

The maximum SAR value was averaged over a cube of tissue using interpolation and extrapolation.

The interpolation, extrapolation and maximum search routines within Dasy52 are all based on the modified Quadratic Shepard's method (Robert J. Renka," Multivariate Interpolation of Large Sets of Scattered Data", University of North Texas ACM Transactions on Mathematical Software, vol. 14, no. 2, June 1988, pp. 139-148).

The interpolation scheme combines a least-square fitted function method with a weighted average method. A trivariate 3-D / bivariate 2-D quadratic function is computed for each measurement point and fitted to neighboring points by a least-square method. For the zoom scan, inverse distance weighting is incorporated to fit distant points more accurately. The interpolating function is finally calculated as a weighted average of the quadratics.

In the zoom scan, the interpolation function is used to extrapolate the Peak SAR from the deepest measurement points to the inner surface of the phantom.

6. MEASUREMENT UNCERTAINTY

DASY5 Uncertainty Budget According to IEC/IEEE 62209-1528 (Frequency band: 300MHz - 3GHz range)								
Symbol	Error Description	Uncert. value	Prob. Dist.	Div.	(c_i) 1g	(c_i) 10g	Std. Unc. (1g)	Std. Unc. (10g)
Measurement System Errors								
CF	Probe Calibration	±12.0%	N	√2	1	1	±6.0%	±6.0%
CFdrift	Probe Calibration Drift	±1.7%	R	√3	1	1	±1.0%	±1.0%
LIN	Probe Linearity	±4.7%	R	√3	1	1	±2.7%	±2.7%
BBS	Broadband Signal	±3.0%	R	√3	1	1	±1.7%	±1.7%
ISO	Probe Isotropy	±7.6%	R	3	1	1	±4.4%	±4.4%
DAE	Data Acquisition	±0.3%	N	1	1	1	±0.3%	±0.3%
AMB	RF Ambient	±1.8%	N	1	1	1	±1.8%	±1.8%
Δsys	Probe Positioning	±3.9%	N	1	0.14	0.14	±0.5%	±0.5%
DAT	Data Processing	±1.2%	N	1	1	1	±1.2%	±1.2%
Phantom and Device Errors								
LIQ(σ)	Conductivity (meas.)^{DAK}	±2.5%	N	√1	0.78	0.71	±2.0%	±1.8%
LIQ(T_σ)	Conductivity (temp.)^{BB}	±3.3%	R	√3	0.78	0.71	±1.5%	±1.4%
EPS	Phantom Permittivity	±14.0%	R	3	0	0	±0%	±0%
DIS	Distance DUT - TSL	±2.0%	N	1	2	2	±4.0%	±4.0%
Dxyz	Device Positioning (±0.5mm)	±1.0%	N	1	1	1	±1.0%	±1.0%
H	Device Holder	±3.6%	N	√1	1	1	±3.6%	±3.6%
MOD	DUT Modulation^{m}	±2.4%	R	√3	1	1	±1.4%	±1.4%
TAS	Time-average SAR	±2.6%	R	3	1	1	±1.5%	±1.5%
RFdrift	DUT drift	±2.5%	N	1	1	1	±2.5%	±2.5%
VAL	Val Antenna Unc.^{val}	±0.0%	N	1	1	1	±0%	±0%
RF_{in}	Unc. Input Power^{val}	±0.0%	N	1	1	1	±0%	±0%
Correction to the SAR results								
C(ε, σ)	Deviation to Target	±1.9%	N	√1	1	0.84	±1.9%	±1.6%
C(R)	SAR scaling^{p}	±0%	R	3	1	1	±0%	±0%
u(ΔSAR)	Combined Uncertainty						±11.0%	±10.9%
U	**Expanded Uncertainty**						±22.1%	±21.9%

7. TEST RESULTS

7.1 SAR Results for Body-Worn Condition with 0mm separation

WLAN 2.4:

Mode	Data Rate [Mbps]	Channel	Frequency [MHz]	Maximum Power [dBm]	Conducted Power [dBm]	Test Position	Measured SAR_{1g} [W/kg]	Power Drift* [dB]	Duty Cycle	Scaling Factor	Reported SAR_{1g} [W/kg]	Plot #
802.11b	11	6	2437	15	14.42	Front	0.0661	-0.57	1:1	1.30	0.09	
802.11b	11	6	2437	15	14.42	Back	0.0971	0.41	1:1	1.26	0.12	
802.11b	11	6	2437	15	14.42	Top	0.146	0.1	1:1	1.14	0.17	
802.11b	11	6	2437	15	14.42	Camera	0.0203	N/A**	1:1	1.14	0.02	
802.11b	11	1	2412	15	14.22	Top	0.16	-0.26	1:1	1.27	0.20	2
802.11b	11	11	2462	15	12.92	Top	0.0898	-0.58	1:1	1.85	0.17	

* Larger than 5% drifts included to scaling factors
** Due to low e-field generated by DUT at the location of drift measurement, the measurements are not applicable.

7.2 IEC 62209-2 AMD1:2019

According to IEC 62209-2 AMD1:2019, the zoom scan complies if the peak spatial-average SAR is below 0.1 W/kg, or if the following criteria is met:

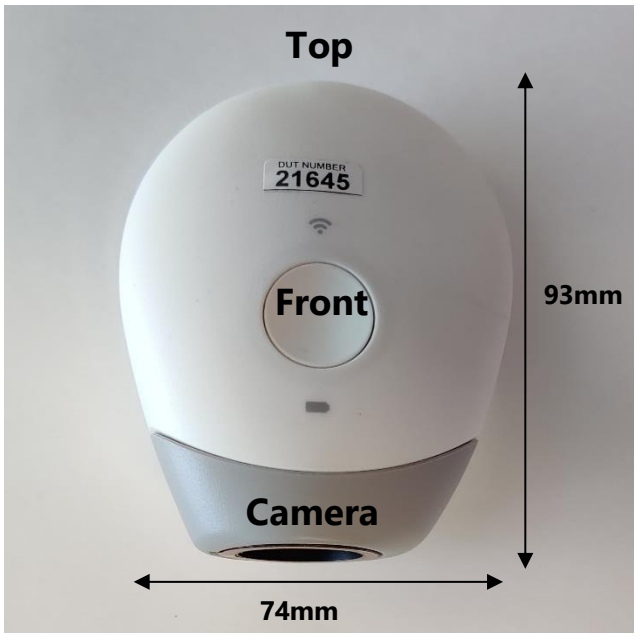
1. The smallest horizontal distance from the local SAR peaks to all points 3 dB below the SAR peak is larger than the horizontal grid step.

2. Ratio of SAR at the second measured point (M2) to the SAR at the closest measured point (M1) at the x-y location of the measured maximum is at least 30%.

Zoom scan compliance according to IEC 62209-2 AMD1:2019 is automatically verified by DASY5 software and all zoom scans in this test report do pass the criteria. The smallest horizontal distance and Ratio between measurement points M2 and M1 of the highest SAR results is available in Appendix C.

APPENDIX A: PHOTOS OF THE DUT

Size of the DUT is maximum 93x74x38 mm



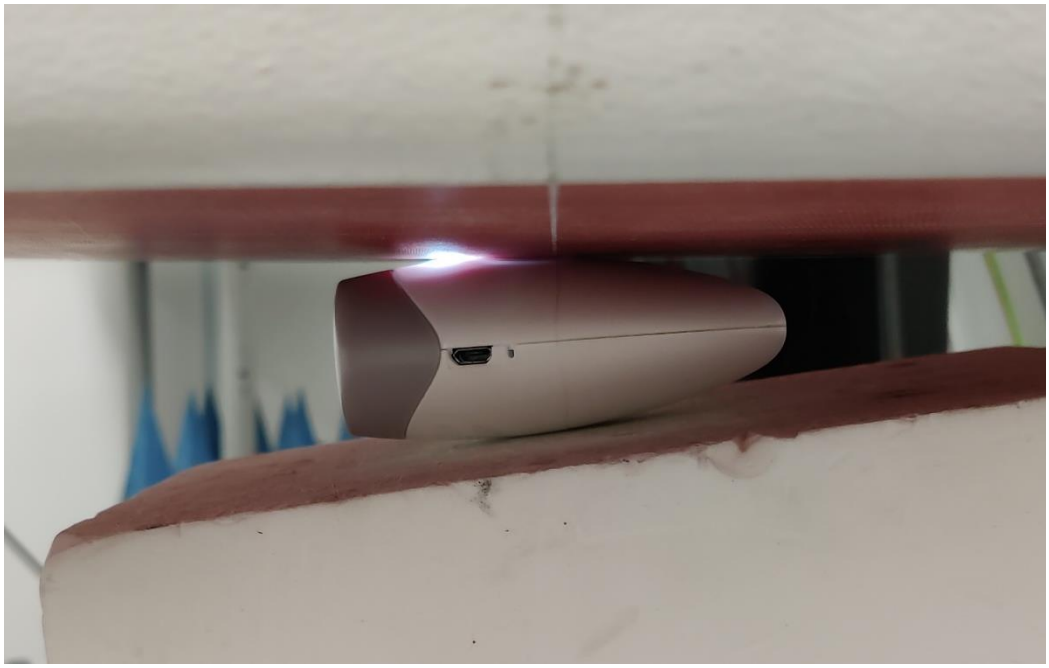


Figure 2 Front of the DUT towards the phantom.

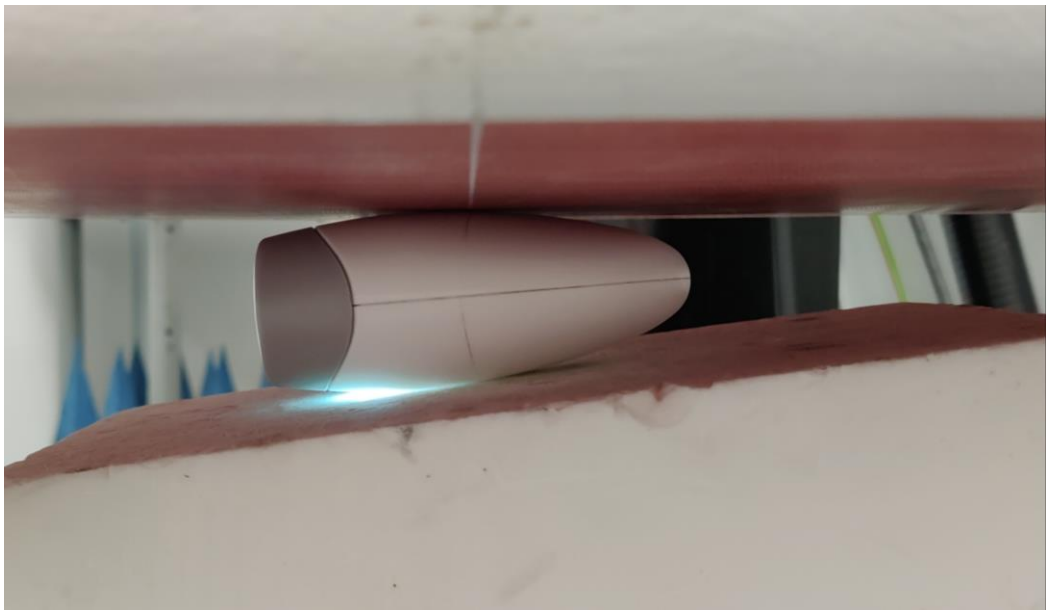


Figure 3 Back of the DUT towards the phantom

Figure 4 Back of the DUT towards the phantom

Figure 5 Camera of the DUT towards the phantom.

APPENDIX B: SYSTEM CHECK SCANS

Plot 1

Date/Time: 21.2.2022 10:30:09

Test Laboratory: Verkotan Oy

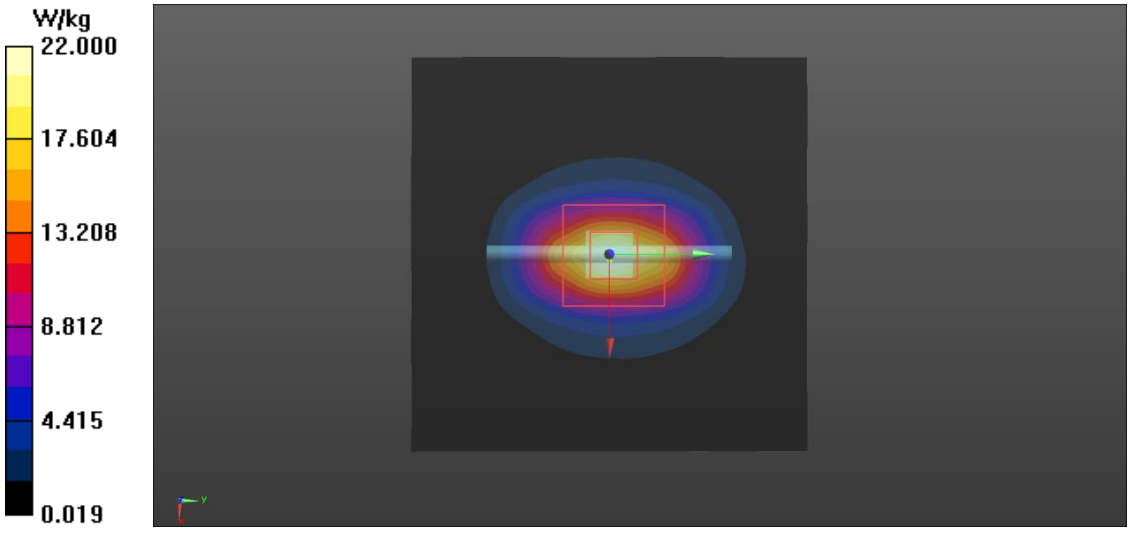
DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 – SN:758

Communication System: UID 0, CW (0); Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz;Communication System PAR: 0 dB; PMF: 1
Medium parameters used (interpolated): f = 2450 MHz; σ = 1.88 S/m; ε_r = 39.63; ρ = 1000 kg/m^3
Phantom section: Flat Section
Measurement Standard: DASY5 (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN3892; ConvF(7.67, 7.67, 7.67) @ 2450 MHz; Calibrated: 28.4.2021
- Sensor-Surface: 1.4mm (Mechanical Surface Detection), z = -4.0, 31.0
- Electronics: DAE4 Sn710; Calibrated: 14.10.2021
- Phantom: SAR1_Phantom1_ELI; Type: QD OVA 002 AA
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

System Check/Area Scan (71x71x1): Interpolated grid: dx=1.200 mm, dy=1.200 m
Maximum value of SAR (interpolated) = 22.0 W/kg
System Check/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 111.3 V/m; Power Drift = -0.10 dB
Peak SAR (extrapolated) = 27.2 W/kg
SAR(1 g) = 13 W/kg; SAR(10 g) = 6.11 W/kg (SAR corrected for target medium)
Smallest distance from peaks to all points 3 dB below = 9 mm
Ratio of SAR at M2 to SAR at M1 = 48.9%
Maximum value of SAR (measured) = 22.0 W/kg



APPENDIX C: MEASUREMENT SCANS

Plot 2

Date/Time: 22.2.2022 8:33:51

Test Laboratory: Verkotan Oy

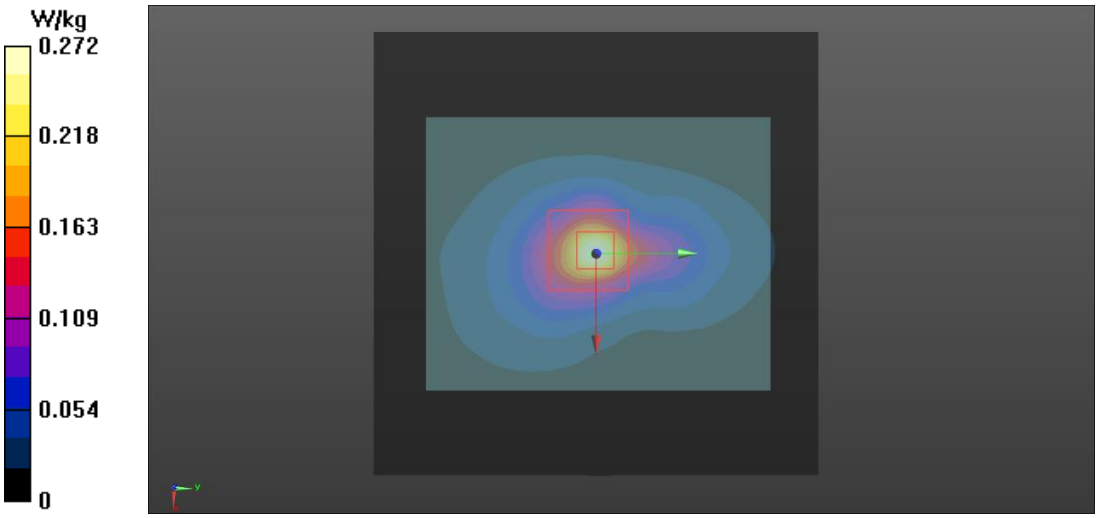
DUT: Skinly3

Communication System: UID 0, WLAN 2.4 (0); Communication System Band: WLAN2.4GHz; Frequency: 2412 MHz;Communication System PAR: 0 dB; PMF: 1
Medium parameters used: f = 2412 MHz; σ = 1.852 S/m; ε_r = 39.686; ρ = 1000 kg/m^3
Phantom section: Flat Section
Measurement Standard: DASY5 (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN3892; ConvF(7.67, 7.67, 7.67) @ 2412 MHz; Calibrated: 28.4.2021
- Sensor-Surface: 1.4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 1.4mm (Mechanical Surface Detection), z = -4.0, 31.0
- Electronics: DAE4 Sn710; Calibrated: 14.10.2021
- Phantom: SAR1_Phantom1_ELI; Type: QD OVA 002 AA
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

WLAN 2.4GHz, CH 1, Top 0mm/Area Scan (101x101x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 0.272 W/kg
WLAN 2.4GHz, CH 1, Top 0mm/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 13.50 V/m; Power Drift = -0.26 dB
Peak SAR (extrapolated) = 0.421 W/kg
SAR(1 g) = 0.160 W/kg; SAR(10 g) = 0.070 W/kg (SAR corrected for target medium)
Smallest distance from peaks to all points 3 dB below = 8.5 mm
Ratio of SAR at M2 to SAR at M1 = 35.4%
Maximum value of SAR (measured) = 0.294 W/kg



APPENDIX D: RELEVANT PAGES FROM PROBE CALIBRATION REPORTS

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

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

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Client Verkotan **Certificate No: EX3-3892_Apr21**

CALIBRATION CERTIFICATE

Object	EX3DV4 - SN:3892
Calibration procedure(s)	QA CAL-01.v9, QA CAL-12.v9, QA CAL-14.v6, QA CAL-23.v5, QA CAL-25.v7 Calibration procedure for dosimetric E-field probes
Calibration date:	April 28, 2021

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 (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	09-Apr-21 (No. 217-03291/03292)	Apr-22
Power sensor NRP-Z91	SN: 103244	09-Apr-21 (No. 217-03291)	Apr-22
Power sensor NRP-Z91	SN: 103245	09-Apr-21 (No. 217-03292)	Apr-22
Reference 20 dB Attenuator	SN: CC2552 (20x)	09-Apr-21 (No. 217-03343)	Apr-22
DAE4	SN: 660	23-Dec-20 (No. DAE4-660_Dec20)	Dec-21
Reference Probe ES3DV2	SN: 3013	30-Dec-20 (No. ES3-3013_Dec20)	Dec-21
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-20)	In house check: Jun-22
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-20)	In house check: Oct-21

	Name	Function	Signature
Calibrated by:	Claudio Leubler	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: April 28, 2021

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

Certificate No: EX3-3892_Apr21 Page 1 of 9

DASY/EASY - Parameters of Probe: EX3DV4 - SN:3892

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu V/(V/m)^2$)[A]	0.48	0.38	0.47	± 10.1 %
DCP (mV)[B]	102.1	102.6	101.5	

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB√μV	C	D dB	VR mV	Max dev.	Unc[E] (k=2)
0	CW	X	0.0	0.0	1.0	0.00	133.7	± 3.0 %	± 4.7 %
		Y	0.0	0.0	1.0		122.8		
		Z	0.0	0.0	1.0		137.1		

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%.

[A] The uncertainties of Norm X,Y,Z do not affect the E^2-field uncertainty inside TSL (see Page 5).
[B] Numerical linearization parameter: uncertainty not required.
[E] Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

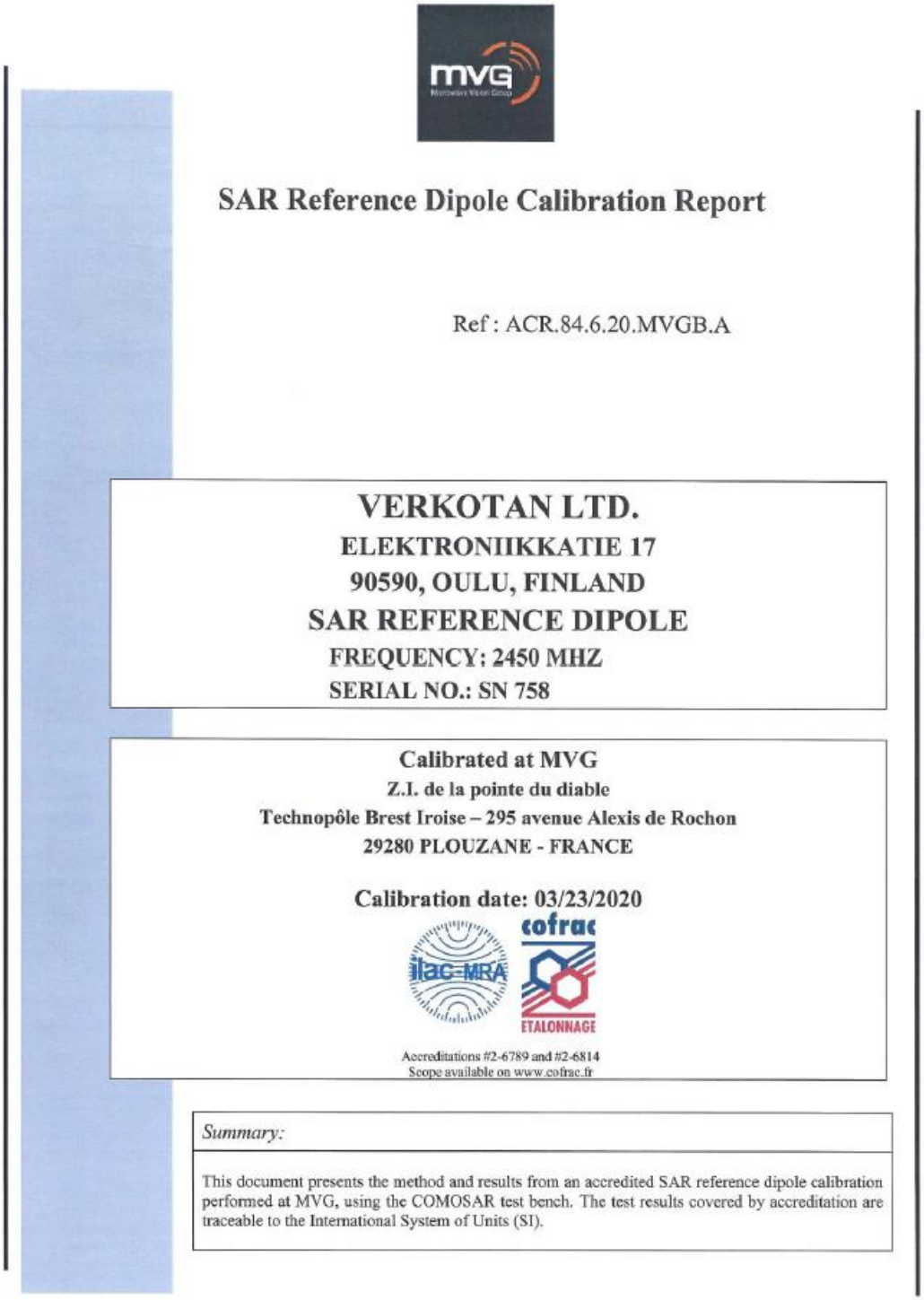
DASY/EASY - Parameters of Probe: EX3DV4 - SN:3892

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) [C]	Relative Permittivity [F]	Conductivity (S/m) [F]	ConvF X	ConvF Y	ConvF Z	Alpha [G]	Depth [G] (mm)	Unc (k=2)
600	42.7	0.88	10.46	10.46	10.46	0.10	1.25	± 13.3 %
750	41.9	0.89	10.23	10.23	10.23	0.45	0.90	± 12.0 %
900	41.5	0.97	9.93	9.93	9.93	0.42	0.80	± 12.0 %
1750	40.1	1.37	8.52	8.52	8.52	0.27	0.86	± 12.0 %
1900	40.0	1.40	8.29	8.29	8.29	0.21	0.86	± 12.0 %
2450	39.2	1.80	7.67	7.67	7.67	0.31	0.90	± 12.0 %
2600	39.0	1.96	7.48	7.48	7.48	0.34	0.90	± 12.0 %
4400	36.9	3.84	6.00	6.00	6.00	0.40	1.60	± 13.1 %
4800	36.4	4.25	5.60	5.60	5.60	0.40	1.80	± 13.1 %

[C] Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.
[F] At frequencies below 3 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.
[G] Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

APPENDIX E: RELEVANT PAGES FROM DIPOLE CALIBRATION REPORTS



SAR Reference Dipole Calibration Report

Ref : ACR.84.6.20.MVGB.A

VERKOTAN LTD.
ELEKTRONIIKKATIE 17
90590, OULU, FINLAND
SAR REFERENCE DIPOLE
FREQUENCY: 2450 MHZ
SERIAL NO.: SN 758

Calibrated at MVG
Z.I. de la pointe du diable
Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE

Calibration date: 03/23/2020

ilac-MRA cofrac ETALONNAGE

Accreditations #2-6789 and #2-6814
Scope available on www.cofrac.fr

Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed at MVG, using the COMOSAR test bench. The test results covered by accreditation are traceable to the International System of Units (SI).

SAR REFERENCE DIPOLE CALIBRATION REPORT Ref: ACR.84.6.20.MVGB.A

	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Technical Manager	3/24/2020	
Checked by :	Jérôme LUC	Technical Manager	3/24/2020	
Approved by :	Yann Toutain	Laboratory Director	3/24/2020	

	Customer Name
Distribution :	Verkotan Ltd.

Issue	Name	Date	Modifications
A	Jérôme LUC	3/24/2020	Initial release

3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3500	37.0±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7±1 %.		26.4 ±1 %.		3.6 ±1 %.	

7 VALIDATION MEASUREMENT

The IEEE Std. 1528, FCC KDBs and CEI/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

7.1 MEASUREMENT CONDITION

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Head Liquid Values: eps' : 37.5 sigma : 1.80
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=5mm/dy=5mm/dz=5mm
Frequency	2450 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-80 %

7.2 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 ±10 %		0.87 ±10 %	
450	43.5 ±10 %		0.87 ±10 %	
750	41.9 ±10 %		0.89 ±10 %	
835	41.5 ±10 %		0.90 ±10 %	
900	41.5 ±10 %		0.97 ±10 %	
1450	40.5 ±10 %		1.20 ±10 %	
1500	40.4 ±10 %		1.23 ±10 %	
1640	40.2 ±10 %		1.31 ±10 %	
1750	40.1 ±10 %		1.37 ±10 %	
1800	40.0 ±10 %		1.40 ±10 %	
1900	40.0 ±10 %		1.40 ±10 %	
1950	40.0 ±10 %		1.40 ±10 %	
2000	40.0 ±10 %		1.40 ±10 %	
2100	39.8 ±10 %		1.49 ±10 %	

2300	39.5 ±10 %		1.67 ±10 %	
2450	39.2 ±10 %	37.5	1.80 ±10 %	1.80
2600	39.0 ±10 %		1.96 ±10 %	
3000	38.5 ±10 %		2.40 ±10 %	
3500	37.9 ±10 %		2.91 ±10 %	

7.3 MEASUREMENT RESULT

The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	
1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4	55.34 (5.53)	24	24.43 (2.44)
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	