
SAR Test Report

Report No.: AGC02762220812FH01

FCC ID : 2A8IR-HOT

APPLICATION PURPOSE : Original Equipment

PRODUCT DESIGNATION : GSM Feature Phone

BRAND NAME : HOLA, SEALOVE

MODEL NAME : Hot, Rio, Maya, Tex, Sea, Love, BOX, EX

APPLICANT : Shenzhen Shenglongwei Technology Co., Ltd

DATE OF ISSUE : Sep. 19,2022

STANDARD(S) : IEEE Std. 1528:2013
FCC 47 CFR Part 2§2.1093
IEEE Std C95.1™-2005
IEC 62209-1: 2016

REPORT VERSION : V1.0

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Report Revise Record

Report Version	Revise Time	Issued Date	Valid Version	Notes
V1.0	/	Sep. 19,2022	Valid	Initial Release

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Test Report	
Applicant Name	Shenzhen Shenglongwei Technology Co., Ltd
Applicant Address	C703, City Shanhai center, Bantian Street, Longgang District, Shenzhen City, P.R.C
Manufacturer Name	Shenzhen Shenglongwei Technology Co., Ltd
Manufacturer Address	C703, City Shanhai center, Bantian Street, Longgang District, Shenzhen City, P.R.C
Factory Name	Shenzhen Shenglongwei Technology Co., Ltd
Factory Address	C703, City Shanhai center, Bantian Street, Longgang District, Shenzhen City, P.R.C
Product Designation	GSM Feature Phone
Brand Name	HOLA, SEALOVE
Model Name	Hot, Rio, Maya, Tex, Sea, Love, BOX, EX
Different Description	All the same except the model name and brand name HOLA is corresponding Hot, Rio, Maya SEALOVE is corresponding Sea, Love, BOX, EX
EUT Voltage	DC3.7V by battery
Applicable Standard	IEEE Std. 1528:2013 FCC 47 CFR Part 2§2.1093 IEEE Std C95.1™-2005 IEC 62209-1: 2016
Test Date	Sep. 01,2022 to Sep. 04,2022
Report Template	AGCRT-US-2.5G/SAR (2021-04-20)

Note: The results of testing in this report apply to the product/system which was tested only.

Prepared By Jack Gui
Jack Gui (Project Engineer) Sep. 04,2022

Reviewed By Calvin Liu
Calvin Liu (Reviewer) Sep. 19,2022

Approved By Max Zhang
Max Zhang (Authorized Officer) Sep. 19,2022

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1. SUMMARY OF MAXIMUM SAR VALUE

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

Frequency Band	Highest Reported 1g-SAR(W/kg)		SAR Test Limit (W/kg)
	Head	Body-worn(with 5mm separation)	
GSM 850	0.551	1.189	1.6
PCS 1900	0.253	1.098	
Simultaneous Reported SAR	1.241		
SAR Test Result	PASS		

This device is compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6W/kg) specified in IEEE Std. 1528:2013; FCC 47CFR § 2.1093; IEEE/ANSI C95.1:2005 and the following specific FCC Test Procedures:

- KDB 447498 D01 General RF Exposure Guidance v06
- KDB 648474 D04 Handset SAR v01r03
- KDB 865664 D01 SAR Measurement 100MHz to 6GHz v01r04
- KDB 941225 D01 3G SAR Procedures v03r01

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2. GENERAL INFORMATION

2.1. EUT Description

General Information	
Product Designation	GSM Feature Phone
Test Model	Hot
Sample ID	220829023
Hardware Version	M399_MB_V1.0
Software Version	M399_128X160_SLW_HOT_V01_20220826
Device Category	Portable
RF Exposure Environment	Uncontrolled
Antenna Type	Internal
GSM and GPRS	
Support Band	<input checked="" type="checkbox"/> GSM 850 <input checked="" type="checkbox"/> PCS 1900 <input type="checkbox"/> GSM 900 <input type="checkbox"/> DCS 1800
GPRS Type	Class B
GPRS Class	Class 12(1Tx+4Rx, 2Tx+3Rx, 3Tx+2Rx, 4Tx+1Rx)
TX Frequency Range	GSM 850 : 820-850MHz;; PCS 1900: 1850-1910MHz;
RX Frequency Range	GSM 850 : 869~894MHz; PCS 1900: 1930~1990MHz
Release Version	R99
Type of modulation	GMSK for GSM/GPRS
Antenna Gain	GSM850:-0.3dBi; PCS1900:1.0dBi
Max. Average Power	GSM850: 33.15 dBm ;PCS1900: 30.18dBm
Bluetooth	
Bluetooth Version	<input type="checkbox"/> V2.0 <input type="checkbox"/> V2.1 <input checked="" type="checkbox"/> V2.1+EDR <input type="checkbox"/> V3.0 <input type="checkbox"/> V3.0+HS <input type="checkbox"/> V4.0 <input type="checkbox"/> V4.1
Operation Frequency	2402~2480MHz
Type of modulation	<input checked="" type="checkbox"/> GFSK <input checked="" type="checkbox"/> $\pi/4$ -DQPSK <input checked="" type="checkbox"/> 8-DPSK
Avg. Burst Power	3.078dBm
Antenna Gain	3dBi
Accessories	
Battery	Brand name: HOLA Model No. : BL-5C Voltage and Capacitance: 3.7 V & 1000mAh
Earphone	Brand name: N/A Model No. : N/A

Note:1.CMU200 can measure the average power and Peak power at the same time

2.The sample used for testing is end product.

3. The test sample has no any deviation to the test method of standard mentioned in page 1.

Product	Type
	<input checked="" type="checkbox"/> Production unit <input type="checkbox"/> Identical Prototype

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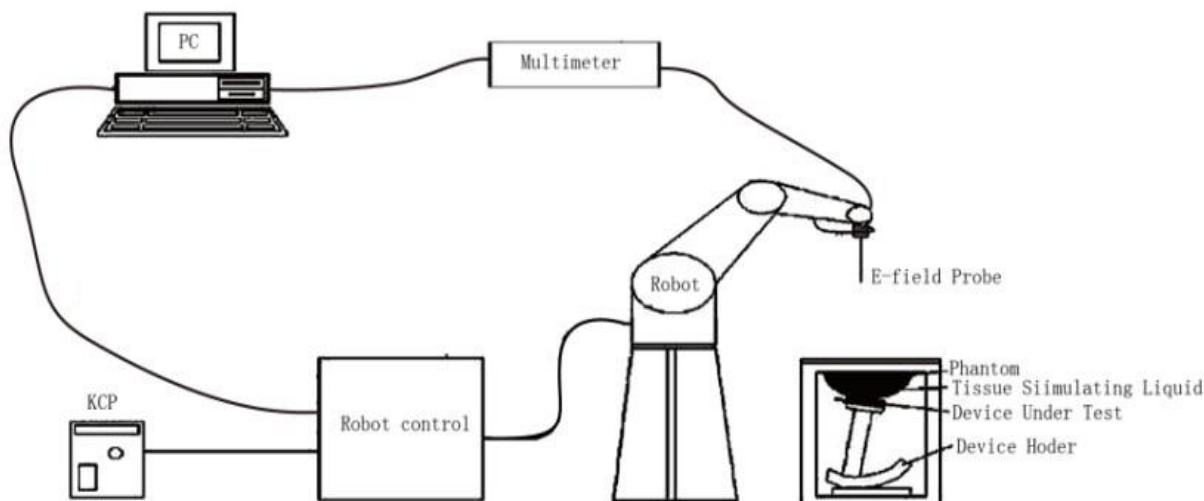
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3. SAR MEASUREMENT SYSTEM

3.1. The SATIMO system used for performing compliance tests consists of following items



The COMOSAR system for performing compliance tests consists of the following items:

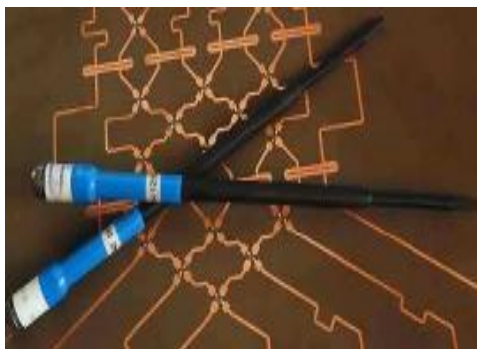
- The PC. It controls most of the bench devices and stores measurement data. A computer running WinXP and the Opensar software.
- The E-Field probe. The probe is a 3-axis system made of 3 distinct dipoles. Each dipole returns a voltage in function of the ambient electric field.
- The Keithley multimeter measures each probe dipole voltages.
- The SAM phantom simulates a human head. The measurement of the electric field is made inside the phantom.
- The liquids simulate the dielectric properties of the human head tissues.
- The network emulator controls the mobile phone under test.
- The validation dipoles are used to measure a reference SAR. They are used to periodically check the bench to make sure that there is no drift of the system characteristics over time.
- The phantom, the device holder and other accessories according to the targeted measurement.

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3.2. COMOSAR E-Field Probe

The SAR measurement is conducted with the dosimetric probe manufactured by SATIMO. 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. SATIMO conducts the probe calibration in compliance with international and national standards (e.g. IEEE 1528 and relevant KDB files.) The calibration data are in Appendix D.

Isotropic E-Field Probe Specification

Model	SSE2	
Manufacture	MVG	
Identification No.	SN 13/22 EPG0368	
Frequency	0.15GHz-6GHz Linearity:±0.09dB(0.15GHz-6GHz)	
Dynamic Range	0.01W/kg-100W/kg Linearity:±0.09dB	
Dimensions	Overall length:330mm Length of individual dipoles:2mm Maximum external diameter:8mm Probe Tip external diameter:2.5mm Distance between dipoles/ probe extremity:1mm	
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.	

3.3. Robot

The COMOSAR system uses the KUKA robot from SATIMO SA (France).For the 6-axis controller COMOSAR system, the KUKA robot controller version from SATIMO is used.

The XL robot series have many features that are important for our application:

- ☐ High precision (repeatability 0.02 mm)
- ☐ High reliability (industrial design)
- ☐ Jerk-free straight movements
- ☐ Low ELF interference (the closed metallic construction shields against motor control fields)
- ☐ 6-axis controller



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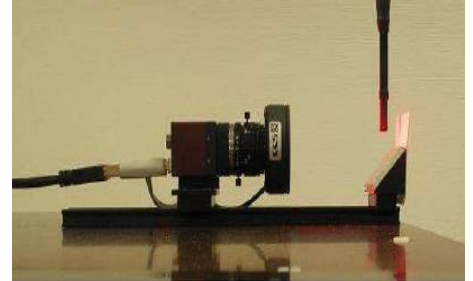
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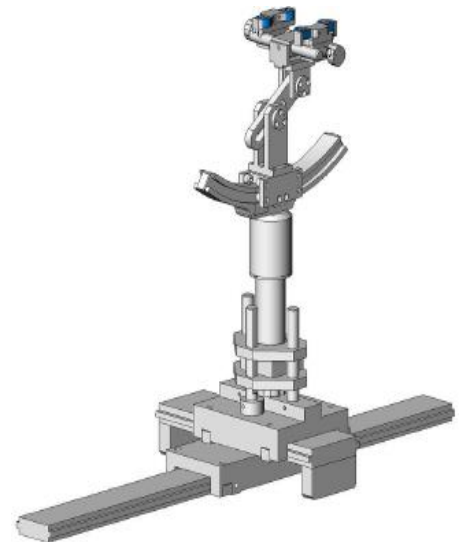
3.4. Video Positioning System

The video positioning system is used in OpenSAR to check the probe. Which is composed of a camera, LED, mirror and mechanical parts. The camera is piloted by the main computer with firewire link. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, such that the robot coordinates are valid for the probe tip. The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.



3.5. Device Holder

The COMOSAR device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (EPR). Thus the device needs no repositioning when changing the angles. The COMOSAR device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon_r = 3$ and loss tangent $\delta = 0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.



3.6. SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region where shell thickness increases to 6mm). It has three measurement areas:

- ☐ Left head
- ☐ Right head
- ☐ Flat phantom



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. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

4. SAR MEASUREMENT PROCEDURE

4.1. Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in 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 occupational/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 given mass 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 can be obtained using either of the following equations:

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

$$SAR = c_h \left. \frac{dT}{dt} \right|_{t=0}$$

Where

SAR	is the specific absorption rate in watts per kilogram;
E	is the r.m.s. value of the electric field strength in the tissue in volts per meter;
σ	is the conductivity of the tissue in siemens per metre;
ρ	is the density of the tissue in kilograms per cubic metre;
c _h	is the heat capacity of the tissue in joules per kilogram and Kelvin;

$\left. \frac{dT}{dt} \right|_{t=0}$ is the initial time derivative of temperature in the tissue in kelvins per second

4.2. SAR Measurement Procedure

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurement are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface is 2.7mm This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties,

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in SATIMO software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in db) is specified in the standards for compliance testing. For example, a 2db range is required in IEEE Standard 1528, whereby 3db is a requirement when compliance is assessed in accordance with the ARIB standard (Japan) If one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximum are detected, the number of Zoom Scan has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100MHz to 6GHz

	$\leq 3 \text{ GHz}$	$> 3 \text{ GHz}$
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	$5 \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	$\leq 2 \text{ GHz}: \leq 15 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 12 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 12 \text{ mm}$ $4 - 6 \text{ GHz}: \leq 10 \text{ mm}$
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan

Zoom Scan are used to assess the peak spatial SAR value within a cubic average volume containing 1g and 10g of simulated tissue. The Zoom Scan measures points(refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1g and 10g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB865664 d01 SAR Measurement 100MHz to 6GHz

Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}			$\leq 2 \text{ GHz}: \leq 8 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz}: \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz}: \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 4 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 3 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 3 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz}: \geq 28 \text{ mm}$ $4 - 5 \text{ GHz}: \geq 25 \text{ mm}$ $5 - 6 \text{ GHz}: \geq 22 \text{ mm}$
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <u>reported</u> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is $\leq 1.4 \text{ W/kg}$, $\leq 8 \text{ mm}$, $\leq 7 \text{ mm}$ and $\leq 5 \text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 4: Power Drift Measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the same settings. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

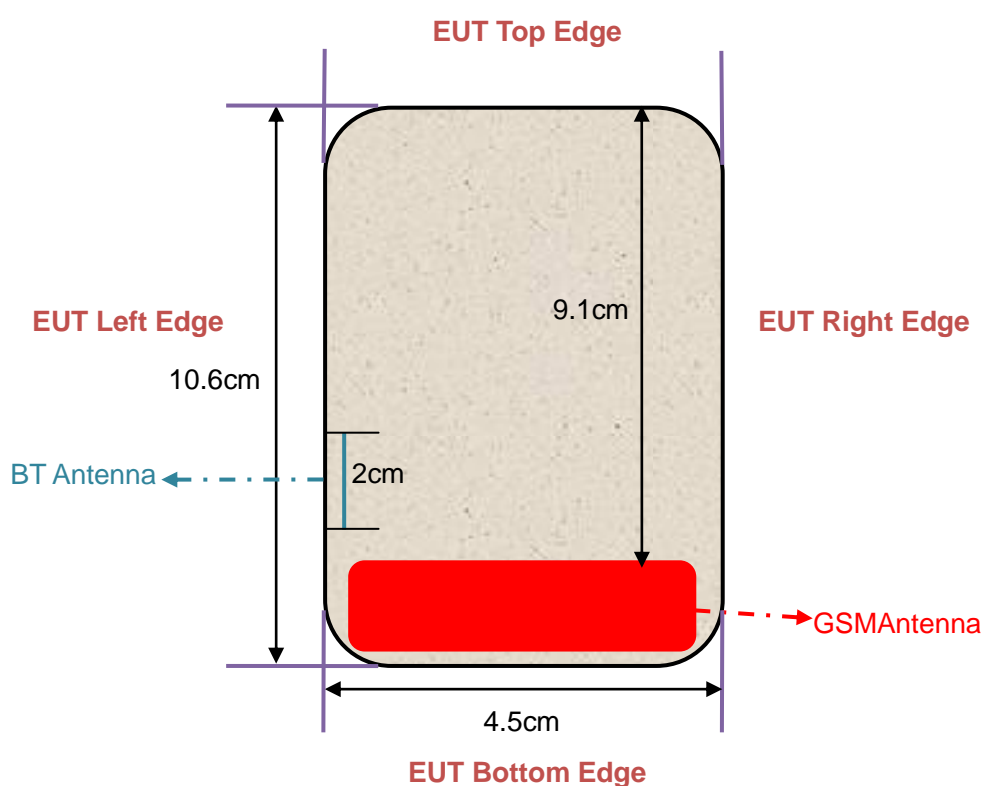
4.3. RF Exposure Conditions

Test Configuration and setting:

The EUT is a model of GSM Portable Mobile Station (MS). It supports GSM/GPRS, BT mode.

For WWAN SAR testing, the device was controlled by using a base station emulator. Communication between the device and the emulator were established by air link. The distance between the EUT and the antenna is larger than 50cm, and the output power radiated from the emulator antenna is at least 30db smaller than the output power of EUT.

Antenna Location: (the back view)



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5. TISSUE SIMULATING LIQUID

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 15cm. For head SAR testing the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15cm For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 10% are listed in 6.2

5.1. The composition of the tissue simulating liquid

Ingredient (% Weight) Frequency (MHz)	Water	Nacl	Polysorbate 20	DGBE	1,2 Propanediol	Triton X-100
835 Head	50.36	1.25	48.39	0.0	0.0	0.0
1900 Head	54.9	0.18	0.0	44.92	0.0	0.0

5.2. Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEC 62209-1 have been incorporated in the following table. The body tissue dielectric parameters recommended by the IEC 62209-2 have been incorporated in the following table.

Target Frequency (MHz)	head		body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
300	45.3	0.87	45.3	0.87
450	43.5	0.87	43.5	0.87
835	41.5	0.90	41.5	0.90
900	41.5	0.97	41.5	0.97
915	41.5	1.01	41.5	1.01
1450	40.5	1.20	40.5	1.20
1610	40.3	1.29	40.3	1.29
1800 – 2000	40.0	1.40	40.0	1.40
2450	39.2	1.80	39.2	1.80
3000	38.5	2.40	38.5	2.40

(ϵ_r = relative permittivity, σ = conductivity and $\rho = 1000 \text{ kg/m}^3$)

5.3. Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using SATIMO Dielectric Probe Kit and R&S Network Analyzer ZVL6.

Tissue Stimulant Measurement for 835MHz					
Head	Fr. (MHz)	Dielectric Parameters ($\pm 10\%$)		Tissue Temp [°C]	Test time
		ϵ_r 41.5 (37.35-45.65)	δ [s/m] 0.90(0.81-0.99)		
	824.2	42.01	0.86	22.1	Sep. 01,2022
	835	41.63	0.89		
	836.6	40.23	0.91		
	848.8	39.61	0.94		

Tissue Stimulant Measurement for 1900MHz					
Head	Fr. (MHz)	Dielectric Parameters ($\pm 10\%$)		Tissue Temp [°C]	Test time
		ϵ_r 40.00(36.00-44.00)	δ [s/m]1.40(1.26-1.54)		
	1850.2	41.26	1.33	21.8	Sep. 04,2022
	1880	40.71	1.36		
	1900	39.63	1.42		
	1909.8	38.24	1.46		

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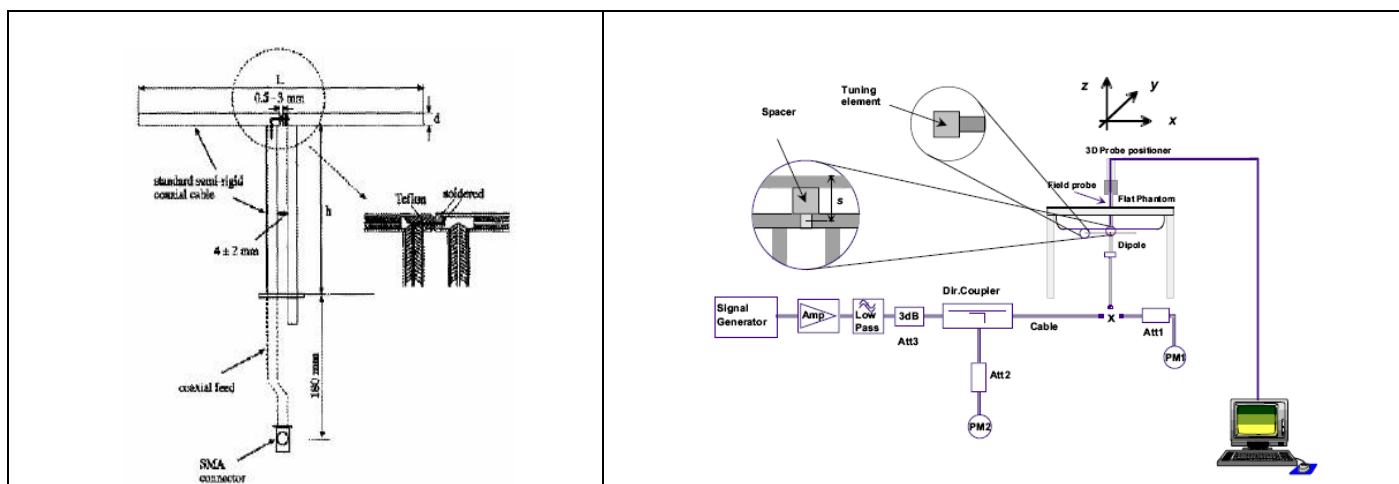
6. SAR SYSTEM CHECK PROCEDURE

6.1. SAR System Check Procedures

SAR system check is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are remeasured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

Each SATIMO system is equipped with one or more system check kits. These units, together with the predefined measurement procedures within the SATIMO software, enable the user to conduct the system check and system validation. System kit includes a dipole, and dipole device holder.

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



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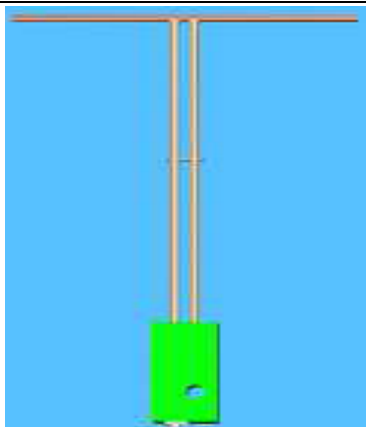
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6.2. SAR System Check

6.2.1. Dipoles

	<p>The dipoles used is based on the IEEE-1528 standard, and is complied with mechanical and electrical specifications in line with the requirements of IEEE. the table below provides details for the mechanical and electrical Specifications for the dipoles.</p>
---	---

Frequency	L (mm)	h (mm)	d (mm)
835MHz	161.0	89.8	3.6
1900MHz	68	39.5	3.6

6.2.2. System Check Result

System Performance Check at 835MHz&1900MHz for Head								
Validation Kit: SN 15/16 DIP 0G835-399& SN 46/11 DIP 1G800-186								
Frequency [MHz]	Target Value(W/kg)		Reference Result ($\pm 10\%$)		Tested Value(W/kg)		Tissue Temp. [°C]	Test time
	1g	10g	1g	10g	1g	10g		
835	9.67	6.14	8.703-10.637	5.526-6.754	9.93	6.16	22.1	Sep. 01,2022
1900	41.26	20.86	37.134-45.386	18.774-22.946	39.89	20.09	21.8	Sep. 04,2022

Note:

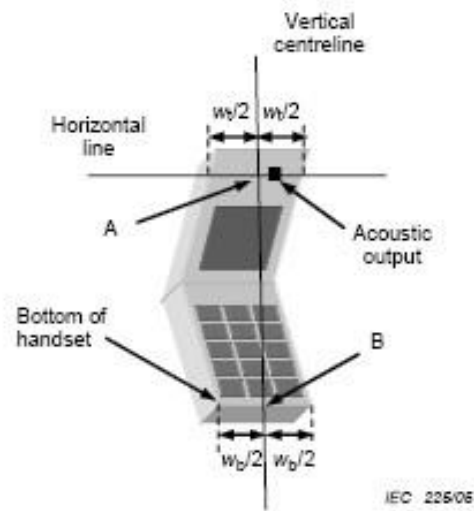
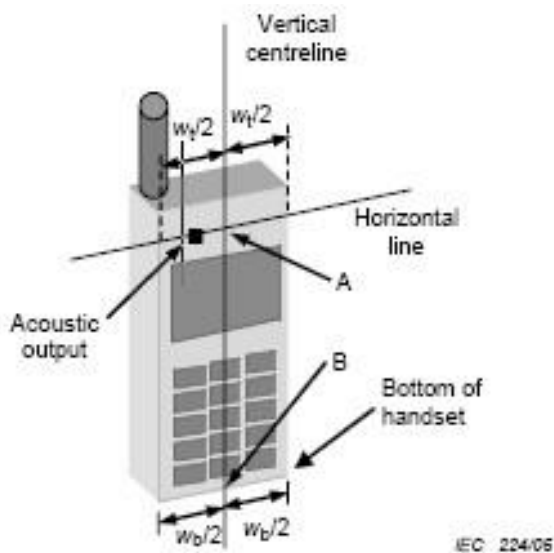
(1) We use a CW signal of 18dBm for system check, and then all SAR values are normalized to 1W forward power. The result must be within $\pm 10\%$ of target value.

7. EUT TEST POSITION

This EUT was tested in **Right Cheek, Right Tilted, Left Cheek, Left Tilted, Body back, Body front**

7.1. Define Two Imaginary Lines on the Handset

- (1) The vertical centerline passes through two points on the front side of the handset the midpoint of the width w_t of the handset at the level of the acoustic output, and the midpoint of the width w_b of the handset.
- (2) The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output. The horizontal line is also tangential to the face of the handset at point A.
- (3) The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily to the front face of the handset, especially for clamshell handsets, handsets with flip covers, and other irregularly shaped handsets.



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7.2. Cheek Position

- (1) To position the device with the vertical center line of the body of the device and the horizontal line crossing the center piece in a plane parallel to the sagittal plane of the phantom. While maintaining the device in this plane, align the vertical center line with the reference plane containing the ear and mouth reference point (M: Mouth, RE: Right Ear, and LE: Left Ear) and align the center of the ear piece with the line RE-LE.
- (2) To move the device towards the phantom with the ear piece aligned with the the line LE-RE until the phone touched the ear. While maintaining the device in the reference plane and maintaining the phone contact with ear, move the bottom of the phone until any point on the front side is in contact with the cheek of the phantom or until contact with the ear is lost



7.3. Tilt Position

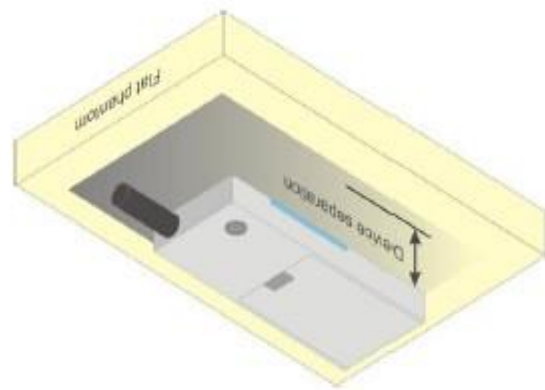
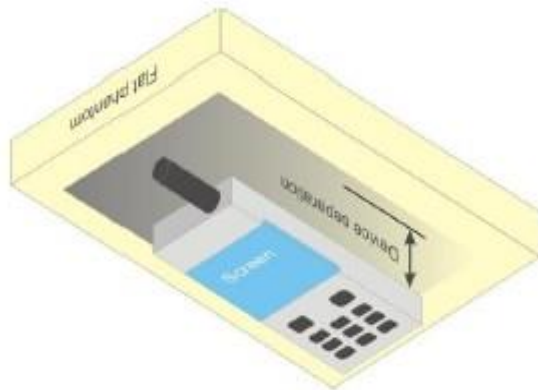
- (1) To position the device in the “cheek” position described above.
- (2) While maintaining the device in the reference plane described above and pivoting against the ear, moves it outward away from the mouth by an angle of 15 degrees or until with the ear is lost.



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7.4. Body Worn Position

- (1) To position the EUT parallel to the phantom surface.
- (2) To adjust the EUT parallel to the flat phantom.
- (3) To adjust the distance between the EUT surface and the flat phantom to **5mm**.



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8. SAR EXPOSURE LIMITS

SAR assessments have been made in line with the requirements of IEEE-1528, and comply with ANSI/IEEE C95.1-2005 “Uncontrolled Environments” limits. These limits apply to a location which is deemed as “Uncontrolled Environment” which can be described as a situation where the general public may be exposed to an RF source with no prior knowledge or control over their exposure.

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

Type Exposure	Uncontrolled Environment Limit (W/kg)
Spatial Peak SAR (1g cube tissue for brain or body)	1.60
Spatial Average SAR (Whole body)	0.08
Spatial Peak SAR (Limbs)	4.0

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9. TEST FACILITY

Test Site	Attestation of Global Compliance (Shenzhen) Co., Ltd
Location	1-2/F, Building 19, Junfeng Industrial Park, Chongqing Road, Heping Community, Fuhai Street, Bao'an District, Shenzhen, Guangdong, China
Designation Number	CN1259
A2LA Cert. No.	5054.02
Description	Attestation of Global Compliance(Shenzhen) Co., Ltd is accredited by A2LA

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10. TEST EQUIPMENT LIST

Equipment description	Manufacturer/ Model	Identification No.	Software version	Current calibration date	Next calibration date
SAR Probe	MVG	SN 13/22 EPG0368	N/A	Apr. 13, 2022	Apr. 12, 2023
Phantom	SATIMO	SN_4511_SAM90	N/A	Validated. No cal required.	Validated. No cal required.
Liquid	SATIMO	-	N/A	Validated. No cal required.	Validated. No cal required.
Comm Tester	Agilent-8960	GB46310822	A.13.07	Aug. 03,2022	Aug. 02,2023
Multimeter	Keithley 2000	1350784	N/A	Aug. 06,2022	Aug. 05,2023
SAR Software	SATIMO-OpenSAR	N/A	OpenSAR V4_02_32	N/A	N/A
Dipole	SATIMO SID835	SN 15/16 DIP 0G835-399	N/A	Apr. 28,2022	Apr. 27,2025
Dipole	SATIMO SID1800	SN 46/11 DIP 1G800-186	N/A	Apr. 28,2022	Apr. 27,2025
Signal Generator	Agilent-E4438C	US41461365	V5.03	Aug. 03,2022	Aug. 02,2023
Vector Analyzer	Agilent / E4440A	MY44303916	N/A	Mar. 28,2022	Mar. 27,2023
Network Analyzer	Rhode & Schwarz ZVL6	SN101443	3.2	Oct. 28,2021	Oct. 27,2022
Attenuator	Warison /WATT-6SR1211	S/N:WRJ34AYM2F1	N/A	June 08,2022	June 07,2023
Attenuator	Mini-circuits / VAT-10+	31405	N/A	June 08,2022	June 07,2023
Amplifier	AS0104-55_55	1004793	N/A	June 09,2022	June 08,2023
Directional Couple	Werlatone/ C5571-10	SN99463	N/A	Mar. 10,2022	Mar. 09,2024
Directional Couple	Werlatone/ C6026-10	SN99482	N/A	Mar. 10,2022	Mar. 09,2024
Power Sensor	NRP-Z21	1137.6000.02	N/A	Sep. 07,2021	Sep. 06,2022
Power Sensor	NRP-Z23	100323	N/A	Feb. 16,2022	Feb. 15,2023
Power Viewer	R&S	V2.3.1.0	N/A	N/A	N/A
Calibration standard parts for network sub - port	R&S/ ZV-Z132	N/A	V2.3.1.0	Dec. 07, 2021	Dec. 06, 2022

Note: Per KDB 865664 Dipole SAR Validation, AGC Lab has adopted 3 years calibration intervals. On annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

1. There is no physical damage on the dipole;
2. System validation with specific dipole is within 10% of calibrated value;
3. Return-loss is within 20% of calibrated measurement;
4. Impedance is within 5Ω of calibrated measurement.

11. MEASUREMENT UNCERTAINTY

SATIMO Uncertainty- SN 13/22 EPGO368 Measurement uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration	E.2.1	7.000	N	1	1	1	7.000	7.000	∞
Axial Isotropy	E.2.2	0.175	R	$\sqrt{3}$	$\sqrt{0.5}$	$\sqrt{0.5}$	0.071	0.071	∞
Hemispherical Isotropy	E.2.2	0.175	R	$\sqrt{3}$	$\sqrt{0.5}$	$\sqrt{0.5}$	0.071	0.071	∞
Boundary effect	E.2.3	1.000	R	$\sqrt{3}$	1	1	0.577	0.577	∞
Linearity	E.2.4	0.990	R	$\sqrt{3}$	1	1	0.572	0.572	∞
System detection limits	E.2.4	1.000	R	$\sqrt{3}$	1	1	0.577	0.577	∞
Modulation response	E.2.5	3.000	R	$\sqrt{3}$	1	1	1.732	1.732	∞
Readout Electronics	E.2.6	0.021	N	1	1	1	0.021	0.021	∞
Response Time	E.2.7	0.000	R	$\sqrt{3}$	1	1	0.000	0.000	∞
Integration Time	E.2.8	1.400	R	$\sqrt{3}$	1	1	0.808	0.808	∞
RF ambient conditions-Noise	E.6.1	3.000	R	$\sqrt{3}$	1	1	1.732	1.732	∞
RF ambient conditions-reflections	E.6.1	3.000	R	$\sqrt{3}$	1	1	1.732	1.732	∞
Probe positioner mechanical tolerance	E.6.2	1.400	R	$\sqrt{3}$	1	1	0.808	0.808	∞
Probe positioning with respect to phantom shell	E.6.3	1.400	R	$\sqrt{3}$	1	1	0.808	0.808	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	2.300	R	$\sqrt{3}$	1	1	1.328	1.328	∞
Test sample Related									
Test sample positioning	E.4.2	2.6	N	1	1	1	2.600	2.600	∞
Device holder uncertainty	E.4.1	3	N	1	1	1	3.000	3.000	∞
Output power variation—SAR drift measurement	E.2.9	5	R	$\sqrt{3}$	1	1	2.887	2.887	∞
SAR scaling	E.6.5	5	R	$\sqrt{3}$	1	1	2.887	2.887	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	4	R	$\sqrt{3}$	1	1	2.309	2.309	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.900	1.596	∞
Liquid conductivity measurement	E.3.3	4	R	$\sqrt{3}$	0.78	0.71	3.120	2.840	∞
Liquid permittivity measurement	E.3.3	5	N	1	0.78	0.71	1.150	1.300	M
Liquid conductivity—temperature uncertainty	E.3.4	2.5	R	$\sqrt{3}$	0.23	0.26	1.126	1.025	∞
Liquid permittivity—temperature uncertainty	E.3.4	2.5	N	1	0.23	0.26	0.332	0.375	M
Combined Standard Uncertainty			RSS				10.529	10.344	
Expanded Uncertainty (95% Confidence interval)			K=2				21.058	20.688	

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SATIMO Uncertainty- SN 13/22 EPG0368									
System Validation uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration	E.2.1	7.000	N	1	1	1	7.000	7.000	∞
Axial Isotropy	E.2.2	0.175	R	$\sqrt{3}$	1	1	0.101	0.101	∞
Hemispherical Isotropy	E.2.2	0.175	R	$\sqrt{3}$	0	0	0.000	0.000	∞
Boundary effect	E.2.3	1.000	R	$\sqrt{3}$	1	1	0.577	0.577	∞
Linearity	E.2.4	0.990	R	$\sqrt{3}$	1	1	0.572	0.572	∞
System detection limits	E.2.4	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Modulation response	E.2.5	3.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Readout Electronics	E.2.6	0.021	N	1	1	1	0.021	0.021	∞
Response Time	E.2.7	0.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Integration Time	E.2.8	1.4	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient conditions-reflections	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner mechanical tolerance	E.6.2	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to phantom shell	E.6.3	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	∞
System validation source									
Deviation of experimental dipole from numerical dipole	E.6.4	5.0	N	1	1	1	5.00	5.00	∞
Input power and SAR drift measurement	8,6.6.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Dipole axis to liquid distance	8,E.6.6	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Phantom and set-up									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	4.0	R	$\sqrt{3}$	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.90	1.60	∞
Liquid conductivity (temperature uncertainty)	E.3.3	2.5	R	$\sqrt{3}$	0.78	0.71	1.13	1.02	∞
Liquid conductivity (measured)	E.3.3	4	N	1	0.78	0.71	3.12	2.84	M
Liquid permittivity (temperature uncertainty)	E.3.4	2.5	R	$\sqrt{3}$	0.23	0.26	0.33	0.38	∞
Liquid permittivity (measured)	E.3.4	5	N	1	0.23	0.26	1.15	1.30	M
Combined Standard Uncertainty			RSS				10.462	10.276	
Expanded Uncertainty (95% Confidence interval)			K=2				20.924	20.551	

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SATIMO Uncertainty- SN 13/22 EPG0368									
System Check uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration drift	E.2.1.3	0.500	N	1	1	1	0.50	0.50	∞
Axial Isotropy	E.2.2	0.175	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Hemispherical Isotropy	E.2.2	0.175	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Boundary effect	E.2.3	1.000	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Linearity	E.2.4	0.990	R	$\sqrt{3}$	0	0	0.00	0.00	∞
System detection limits	E.2.4	1.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Modulation response	E.2.5	3.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Readout Electronics	E.2.6	0.021	N	1	0	0	0.00	0.00	∞
Response Time	E.2.7	0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Integration Time	E.2.8	1.4	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-reflections	E.6.1	3.0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Probe positioner mechanical tolerance	E.6.2	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to phantom shell	E.6.3	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	2.3	R	$\sqrt{3}$	0	0	0.00	0.00	∞
System check source (dipole)									
Deviation of experimental dipoles	E.6.4	2.0	N	1	1	1	2.00	2.00	∞
Input power and SAR drift measurement	8,6.6.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Dipole axis to liquid distance	8,E.6.6	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	4	R	$\sqrt{3}$	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.90	1.60	∞
Liquid conductivity measurement	E.3.3	4	R	$\sqrt{3}$	0.78	0.71	3.12	2.84	∞
Liquid permittivity measurement	E.3.3	5	N	1	0.78	0.71	1.15	1.30	M
Liquid conductivity—temperature uncertainty	E.3.4	2.5	R	$\sqrt{3}$	0.23	0.26	1.13	1.02	∞
Liquid permittivity—temperature uncertainty	E.3.4	2.5	N	1	0.23	0.26	0.33	0.38	M
Combined Standard Uncertainty			RSS				5.562	5.203	
Expanded Uncertainty (95% Confidence interval)			K=2				11.124	10.406	

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12. CONDUCTED POWER MEASUREMENT

GSM BAND

Mode	Frequency(MHz)	Avg. Burst Power(dBm)	Duty cycle Factor(dBm)	Frame Power(dBm)
Maximum Power <1>				
GSM 850	824.2	33.15	-9	24.15
	836.6	33.13	-9	24.13
	848.8	32.94	-9	23.94
GPRS 850 (1 Slot)	824.2	33.10	-9	24.10
	836.6	33.04	-9	24.04
	848.8	32.88	-9	23.88
GPRS 850 (2 Slot)	824.2	30.79	-6	24.79
	836.6	30.81	-6	24.81
	848.8	30.47	-6	24.47
GPRS 850 (3 Slot)	824.2	28.25	-4.26	23.99
	836.6	28.34	-4.26	24.08
	848.8	28.41	-4.26	24.15
GPRS 850 (4 Slot)	824.2	26.69	-3	23.69
	836.6	26.74	-3	23.74
	848.8	26.73	-3	23.73
Maximum Power <2>				
GSM 850	824.2	32.01	-9	23.01
	836.6	31.86	-9	22.86
	848.8	31.72	-9	22.72
GPRS 850 (1 Slot)	824.2	31.77	-9	22.77
	836.6	31.34	-9	22.34
	848.8	31.17	-9	22.17
GPRS 850 (2 Slot)	824.2	30.13	-6	24.13
	836.6	30.57	-6	24.57
	848.8	29.70	-6	23.70
GPRS 850 (3 Slot)	824.2	27.35	-4.26	23.09
	836.6	27.34	-4.26	23.08
	848.8	27.80	-4.26	23.54
GPRS 850 (4 Slot)	824.2	25.84	-3	22.84
	836.6	26.64	-3	23.64
	848.8	25.81	-3	22.81

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Mode	Frequency(MHz)	Avg. Burst Power(dBm)	Duty cycle Factor(dBm)	Frame Power(dBm)
Maximum Power <1>				
PCS1900	1850.2	30.18	-9	21.18
	1880	30.05	-9	21.05
	1909.8	29.68	-9	20.68
GPRS1900 (1 Slot)	1850.2	30.20	-9	21.2
	1880	30.05	-9	21.05
	1909.8	29.74	-9	20.74
GPRS1900 (2 Slot)	1850.2	27.67	-6	21.67
	1880	27.57	-6	21.57
	1909.8	27.69	-6	21.69
GPRS1900 (3 Slot)	1850.2	25.33	-4.26	21.07
	1880	25.41	-4.26	21.15
	1909.8	25.36	-4.26	21.1
GPRS1900 (4 Slot)	1850.2	23.54	-3	20.54
	1880	23.35	-3	20.35
	1909.8	23.28	-3	20.28
Maximum Power <2>				
PCS1900	1850.2	29.85	-9	20.85
	1880	29.51	-9	20.51
	1909.8	29.33	-9	20.33
GPRS1900 (1 Slot)	1850.2	29.27	-9	20.27
	1880	29.09	-9	20.09
	1909.8	29.04	-9	20.04
GPRS1900 (2 Slot)	1850.2	27.38	-6	21.38
	1880	27.50	-6	21.50
	1909.8	26.96	-6	20.96
GPRS1900 (3 Slot)	1850.2	24.60	-4.26	20.34
	1880	25.16	-4.26	20.90
	1909.8	24.74	-4.26	20.48
GPRS1900 (4 Slot)	1850.2	22.77	-3	19.77
	1880	23.31	-3	20.31
	1909.8	22.59	-3	19.59

Note 1:

The Frame Power (Source-based time-averaged Power) is scaled the maximum burst average power based on time slots. The calculated methods are show as following:

Frame Power = Max burst power (1 Up Slot) – 9 dB

Frame Power = Max burst power (2 Up Slot) – 6 dB

Frame Power = Max burst power (3 Up Slot) – 4.26 dB

Frame Power = Max burst power (4 Up Slot) – 3 dB

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Bluetooth_ V2.1+EDR

Modulation	Channel	Frequency(MHz)	Peak Power (dBm)
GFSK	0	2402	3.078
	39	2441	2.252
	78	2480	2.349
$\pi/4$ -DQPSK	0	2402	2.946
	39	2441	2.338
	78	2480	2.156
8-DPSK	0	2402	3.055
	39	2441	2.092
	78	2480	2.248

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13. TEST RESULTS

13.1. SAR Test Results Summary

13.1.1. Test position and configuration

Head SAR was performed with the device configured in the positions according to IEEE 1528-2013, Body-worn SAR was performed with the device 5mm from the phantom.

13.1.2. Operation Mode

1. Per KDB 447498 D01 v06 ,for each exposure position, if the highest 1-g SAR is ≤ 0.8 W/kg, testing for low and high channel is optional.
2. Per KDB 865664 D01 v01r04,for each frequency band, if the measured SAR is ≥ 0.8 W/kg, testing for repeated SAR measurement is required , that the highest measured SAR is only to be tested. When the SAR results are near the limit, the following procedures are required for each device to verify these types of SAR measurement related variation concerns by repeating the highest measured SAR configuration in each frequency band.
 - (1) When the original highest measured SAR is ≥ 0.8 W/kg, repeat that measurement once.
 - (2) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is >1.20 or when the original or repeated measurement is ≥ 1.45 W/kg.
 - (3) Perform a third repeated measurement only if the original, first and second repeated measurement is ≥ 1.5 W/kg and ratio of largest to smallest SAR for the original, first and second measurement is ≥ 1.20 .
3. Body-worn exposure conditions are intended to voice call operations, therefore GSM voice call mode is selected to be test.
4. Per KDB 648474 D04 v01r03,when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected is not required.
5. Maximum Scaling SAR in order to calculate the Maximum SAR values to test under the standard Peak Power, Calculation method is as follows:
Maximum Scaling SAR =tested SAR (Max.) \times [maximum turn-up power (mw)/ maximum measurement output power(mw)]
6. Proximity sensor, just for avoiding the wrong operation in the phone screen when call, and has no influence on output power or SAR result.

13.1.3. Test Result

SAR MEASUREMENT									
Depth of Liquid (cm):>15					Relative Humidity (%): 63.7				
Product: GSM Feature Phone									
Test Mode: GSM850 with GMSK modulation									
Position	Mode	Ch.	Fr. (MHz)	Power Drift (<±5%)	SAR (1g) (W/kg)	Max. Tune-up Power (dBm)	Meas. output Power (dBm)	Scaled SAR (W/kg)	Limit (W/kg)
SIM 1 Card									
Left Cheek	voice	190	836.6	-0.20	0.506	33.50	33.13	0.551	1.6
Left Tilt	voice	190	836.6	0.37	0.243	33.50	33.13	0.265	1.6
Right Cheek	voice	190	836.6	-0.38	0.505	33.50	33.13	0.550	1.6
Right Tilt	voice	190	836.6	-0.17	0.259	33.50	33.13	0.282	1.6
Body back	voice	128	824.2	-0.47	0.941	33.50	33.15	1.020	1.6
Body back	voice	190	836.6	0.12	1.042	33.50	33.13	1.135	1.6
Body back	voice	251	848.8	-0.67	0.935	33.50	32.94	1.064	1.6
Body front	voice	190	836.6	0.16	0.408	33.50	33.13	0.444	1.6
Body back	GPRS-2 slot	128	824.2	-0.22	0.979	30.90	30.79	1.004	1.6
Body back	GPRS-2 slot	190	836.6	0.32	1.146	30.90	30.81	1.170	1.6
Body back	GPRS-2 slot	251	848.8	-0.51	1.077	30.90	30.47	1.189	1.6
Body front	GPRS-2 slot	190	836.6	-0.80	0.456	30.90	30.81	0.466	1.6
Edge 2(Right)	GPRS-2 slot	190	836.6	-0.80	0.416	30.90	30.81	0.425	1.6
Edge 3(Bottom)	GPRS-2 slot	190	836.6	0.51	0.163	30.90	30.81	0.166	1.6
Edge 4(Left)	GPRS-2 slot	190	836.6	-0.91	0.582	30.90	30.81	0.594	1.6

Note:

- When the 1-g Reported SAR is ≤ 0.8 W/kg, testing for low and high channel is optional. Refer to KDB 447498.
- The test separation for body back and front is 5mm of all above table.

SAR MEASUREMENT									
Depth of Liquid (cm):>15					Relative Humidity (%): 48.3				
Product: GSM Feature Phone									
Test Mode: PCS1900 with GMSK modulation									
Position	Mode	Ch.	Fr. (MHz)	Power Drift (<±5%)	SAR (1g) (W/kg)	Max. Tune-up Power (dBm)	Meas. output Power (dBm)	Scaled SAR (W/kg)	Limit (W/kg)
SIM 1 Card									
Left Cheek	voice	661	1880.0	-0.24	0.179	30.20	30.05	0.185	1.6
Left Tilt	voice	661	1880.0	-0.18	0.038	30.20	30.05	0.039	1.6
Right Cheek	voice	661	1880.0	0.18	0.244	30.20	30.05	0.253	1.6
Right Tilt	voice	661	1880.0	-0.83	0.054	30.20	30.05	0.056	1.6
Body back	voice	512	1850.2	0.87	1.093	30.20	30.18	1.098	1.6
Body back	voice	661	1880.0	0.30	0.968	30.20	30.05	1.002	1.6
Body back	voice	810	1909.8	-0.65	0.861	30.20	29.68	0.971	1.6
Body front	voice	661	1880.0	0.89	0.348	30.20	30.05	0.360	1.6
Body back	GPRS-2 slot	512	1850.2	-0.40	1.008	28.00	27.67	1.088	1.6
Body back	GPRS-2 slot	661	1880.0	0.33	0.983	28.00	27.57	1.085	1.6
Body back	GPRS-2 slot	810	1909.8	-0.93	0.999	28.00	27.69	1.073	1.6
Body front	GPRS-2 slot	661	1880.0	0.52	0.376	28.00	27.57	0.415	1.6
Edge 2(Right)	GPRS-2 slot	661	1880.0	0.25	0.407	28.00	27.57	0.449	1.6
Edge 3(Bottom)	GPRS-2 slot	661	1880.0	-0.64	0.393	28.00	27.57	0.434	1.6
Edge 4(Left)	GPRS-2 slot	661	1880.0	-0.57	0.156	28.00	27.57	0.172	1.6

Note:

- When the 1-g Reported SAR is ≤ 0.8 W/kg, testing for low and high channel is optional. Refer to KDB 447498.
- The test separation for body back and front is 5mm of all above table.

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Repeated SAR										
Product: GSM Feature Phone										
Test Mode: GSM850&PCS1900 with GMSK modulation										
Position	Mode	Ch.	Fr. (MHz)	Power Drift (<±5%)	Once SAR (1g) (W/kg)	Power Drift (<±5%)	Twice SAR (1g) (W/kg)	Power Drift (<±5%)	Third SAR (1g) (W/kg)	Limit (W/kg)
Body back	GPRS-2 slot	190	836.6	-0.12	1.125	-	-	-	-	1.6
Body back	voice	512	1850.2	0.23	1.019	-	-	-	-	1.6

The second repeated SAR judge reference								
Product: GSM Feature Phone								
Band	Position	Mode	Ch.	Fr. (MHz)	Original SAR (1g) (W/kg)	First SAR (1g) (W/kg)	Ratio	Limit
GSM850	Body back	GPRS-2 slot	190	836.6	1.146	1.125	1.019	<1.2
PCS1900	Body back	voice	512	1850.2	1.093	1.019	1.073	<1.2

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NO	Simultaneous state	Portable Handset		
		Head	Body-worn	Hotspot
1	GSM(voice)+Bluetooth(data)	Yes	Yes	-
2	GSM (Data) + Bluetooth(data)	Yes	Yes	-

NOTE:

- Simultaneous with every transmitter must be the same test position.
- KDB 447498 D01, BT SAR is excluded as below table.
- KDB 447498 D01, for handsets the test separation distance is determined by the smallest distance between the outer surface of the device and the user; which is 0mm for head SAR and 5mm for body-worn SAR.
- According to KDB 447498 D01 4.3.1, Standalone SAR test exclusion is as follow:
For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$
for 1-g SAR, and ≤ 7.5 for 10-g extremity SAR³⁰, where
 - f(GHz) is the RF channel transmit frequency in GHz
 - Power and distance are rounded to the nearest mW and mm before calculation³¹
 - The result is rounded to one decimal place for comparison
 - The values 3.0 and 7.5 are referred to as numeric thresholds in step b) below
The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm, and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to 4.1 f) is applied to determine SAR test exclusion.
- If the test separation distance is < 5 mm, 5mm is used for excluded SAR calculation.
- According to KDB 447498 D01 4.3.2, simultaneous transmission SAR test exclusion is as follow:
 - Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.
 - Any transmitters and antennas should be considered when calculating simultaneous mode.
 - For mobile phone and PC, it's the sum of all transmitters and antennas at the same mode with same position in each applicable exposure condition
 - When the standalone SAR test exclusion of section 4.3.2 is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to the following to det

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})} / x] \text{ W/kg}$$
for test separation distances ≤ 50 mm;
where $x = 7.5$ for 1-g SAR, and $x = 18.75$ for 10-g SAR.
- When the sum of SAR is larger than the limit, SAR test exclusion is determined by the SAR to peak location separation ratio. The simultaneous transmitting antennas in each operating mode and exposure condition combination must be considered one pair at a time to determine the SAR to peak location separation ratio to qualify for test exclusion. The ratio is determined by $(\text{SAR}_1 + \text{SAR}_2) / 1.5 / R_i$, rounded to two decimal digits, and must be ≤ 0.04 for all antenna pairs in the configuration to qualify for 1-g SAR test exclusion.

Estimated SAR		Max Power including Tune-up Tolerance		Separation Distance (mm)	Estimated SAR (W/kg)
		dBm	mW		
BT	Head	4	2.512	0	0.104
	Body	4	2.512	5	0.052

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Sum of the SAR for GSM 850 & BT:

RF Exposure Conditions	Test Position	Simultaneous Transmission Scenario		Σ 1-g SAR (W/kg)	SPLSR (Yes/No)
		GSM 850	Bluetooth		
Head (voice)	Left Touch	0.551	0.104	0.655	No
	Left Tilt	0.265	0.104	0.369	No
	Right Touch	0.550	0.104	0.654	No
	Right Tilt	0.282	0.104	0.386	No
Body-worn (voice)	Rear	1.135	0.052	1.187	No
	Front	0.444	0.052	0.496	No
Body-worn (Data)	Rear	1.189	0.052	1.241	No
	Front	0.466	0.052	0.518	No

Note:

- According to KDB 447498 D01 General RF Exposure Guidance, when the simultaneous transmission SAR is less than 1.6 W/kg, SPLSR assessment is not required.
- SPLSR mean is "The SAR to Peak Location Separation Ratio "

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Sum of the SAR for PCS 1900 & BT:

RF Exposure Conditions	Test Position	Simultaneous Transmission Scenario		Σ 1-g SAR (W/kg)	SPLSR (Yes/No)
		PCS 1900	Bluetooth		
Head (voice)	Left Touch	0.185	0.104	0.289	No
	Left Tilt	0.039	0.104	0.143	No
	Right Touch	0.253	0.104	0.357	No
	Right Tilt	0.056	0.104	0.160	No
Body-worn (voice)	Rear	1.098	0.052	1.150	No
	Front	0.360	0.052	0.412	No
Body-worn (Data)	Rear	1.088	0.052	1.140	No
	Front	0.415	0.052	0.467	No

Note:

- According to KDB 447498 D01 General RF Exposure Guidance, when the simultaneous transmission SAR is less than 1.6 W/kg, SPLSR assessment is not required.
- SPLSR mean is "The SAR to Peak Location Separation Ratio "

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APPENDIX A. SAR SYSTEM CHECK DATA

Test Laboratory: AGC Lab

Date: Sep. 01,2022

System Check Head 835 MHz

DUT: Dipole 835 MHz Type: SID 835

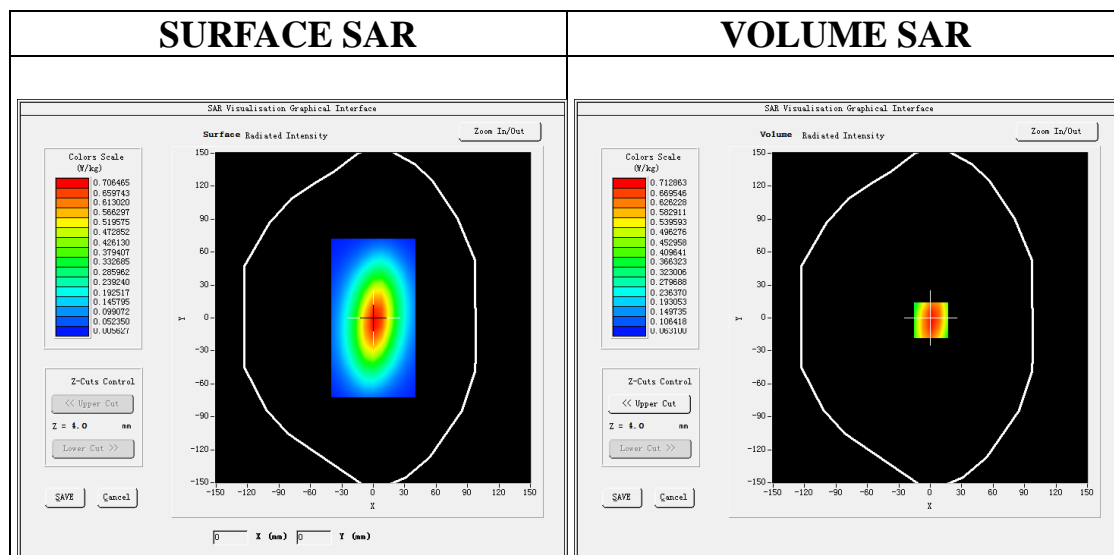
Communication System CW; Communication System Band: D835 (835.0 MHz); Duty Cycle: 1:1; Conv.F=1.42
Frequency: 835 MHz; Medium parameters used: $f = 835$ MHz; $\sigma = 0.89$ mho/m; $\epsilon_r = 41.63$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section; Input Power=18dBm
Ambient temperature (°C):22.3, Liquid temperature (°C): 22.1

SATIMO Configuration

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/System Check 835MHz Head/Area Scan: Measurement grid: dx=8mm, dy=8mm

Configuration/System Check 835MHz Head/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm



Maximum location: X=1.00, Y=-2.00

SAR Peak: 0.99 W/kg

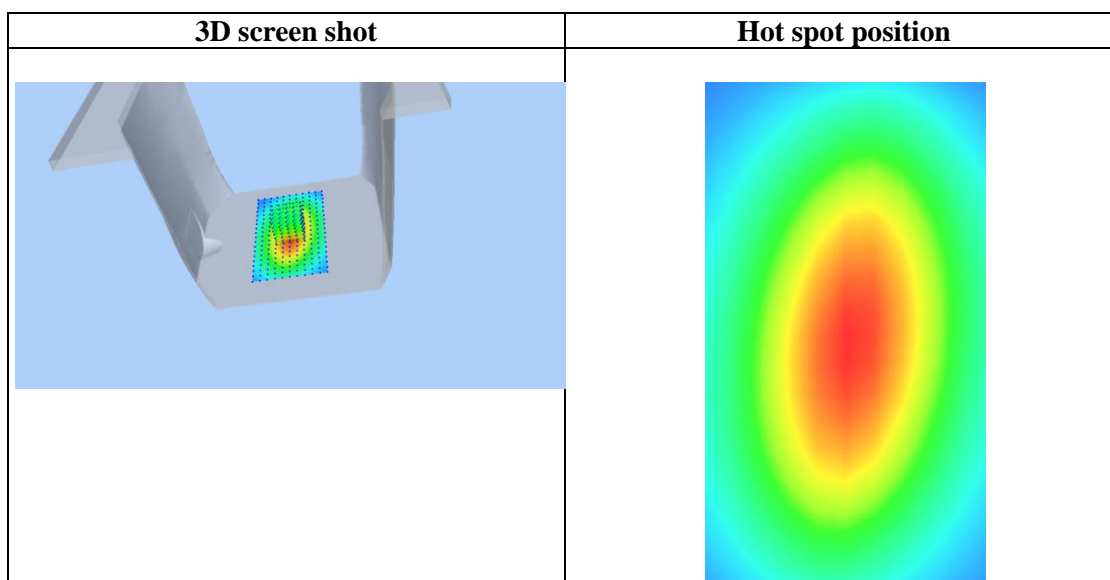
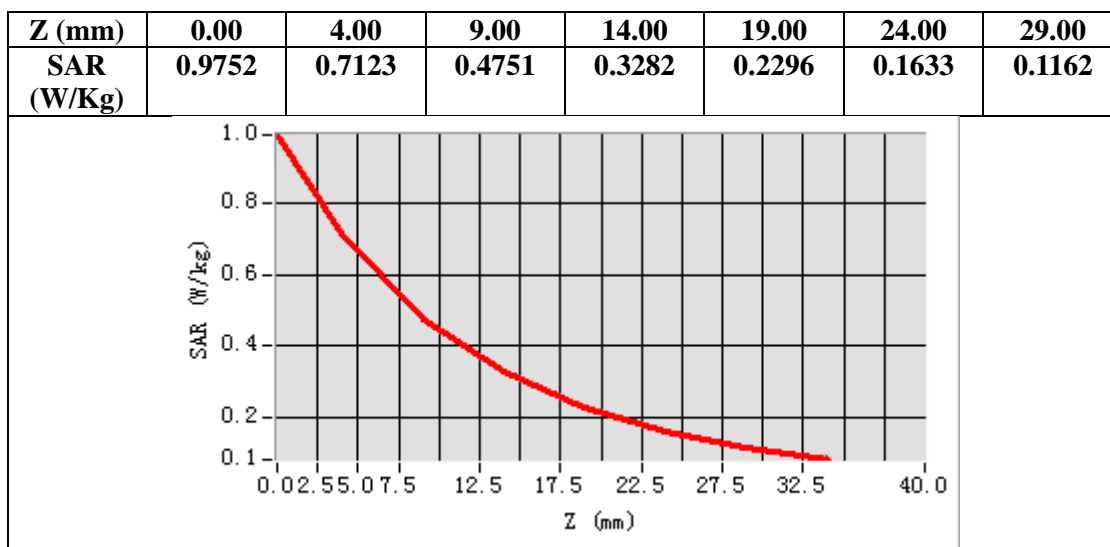
SAR 10g (W/Kg)	0.388623
SAR 1g (W/Kg)	0.626741

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Test Laboratory: AGC Lab
System Check Head 1900MHz
DUT: Dipole 1900 MHz; Type: SID 1900

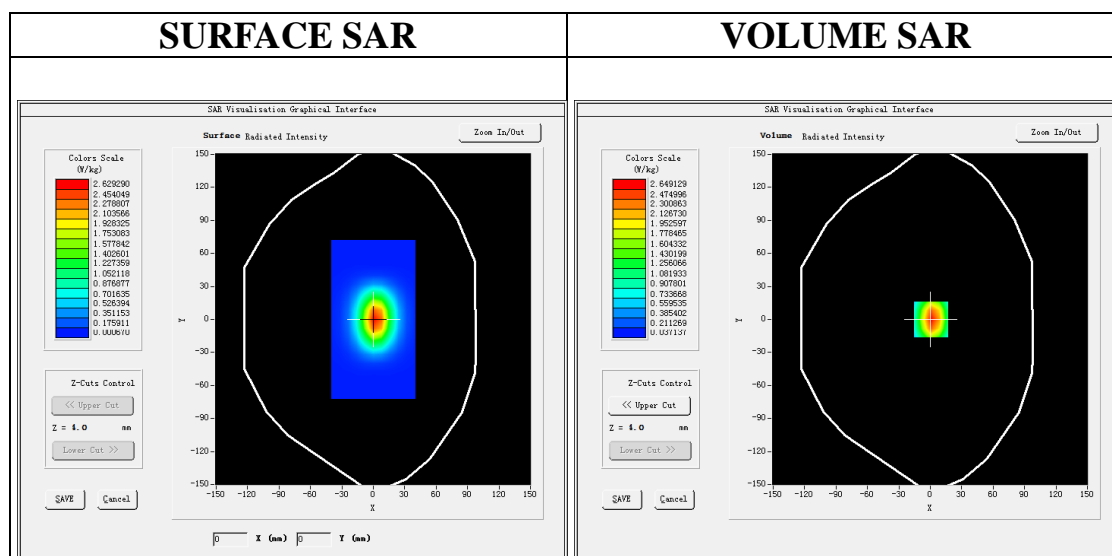
Date: Sep. 04,2022

Communication System: CW; Communication System Band: D1900 (1900.0 MHz); Duty Cycle:1:1; Conv.F=1.77
Frequency: 1900 MHz; Medium parameters used: $f = 1800$ MHz; $\sigma = 1.42$ mho/m; $\epsilon_r = 39.63$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section; Input Power=18dBm
Ambient temperature (°C):22.1, Liquid temperature (°C): 21.8

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/System Check 1900MHz Head/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/System Check 1900MHz Head/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm

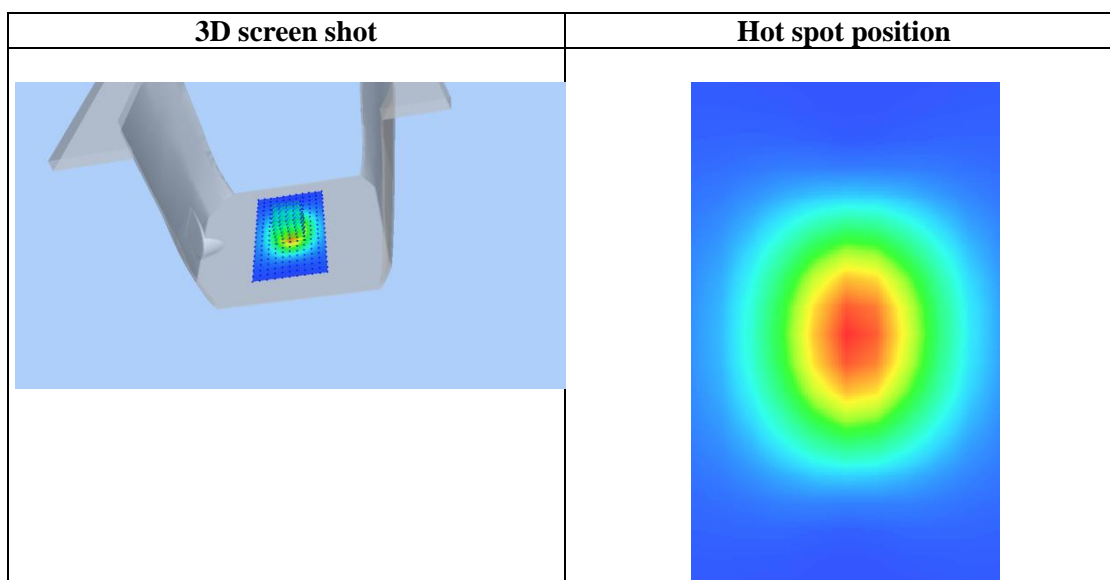
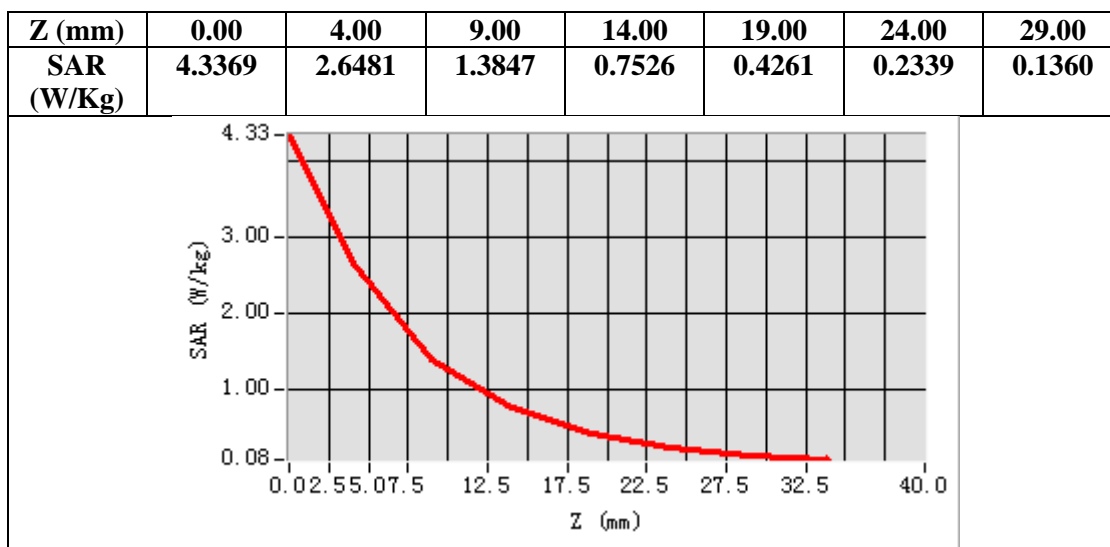


Maximum location: X=1.00, Y=0.00

SAR Peak: 4.33 W/kg

SAR 10g (W/Kg)	1.267526
SAR 1g (W/Kg)	2.516921

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APPENDIX B. SAR MEASUREMENT DATA

Test Laboratory: AGC Lab

Date: Sep. 01,2022

GSM 850 Mid-Touch-Left <SIM 1>

DUT: GSM Feature Phone; Type: Hot

Communication System: Generic GSM; Communication System Band: GSM 850; Duty Cycle: 1:8.3; Conv.F=1.42;
Frequency: 836.6 MHz; Medium parameters used: $f = 835$ MHz; $\sigma = 0.91$ mho/m; $\epsilon_r = 40.23$; $\rho = 1000$ kg/m³;
Phantom section: Left Section
Ambient temperature (°C): 22.3, Liquid temperature (°C): 22.1

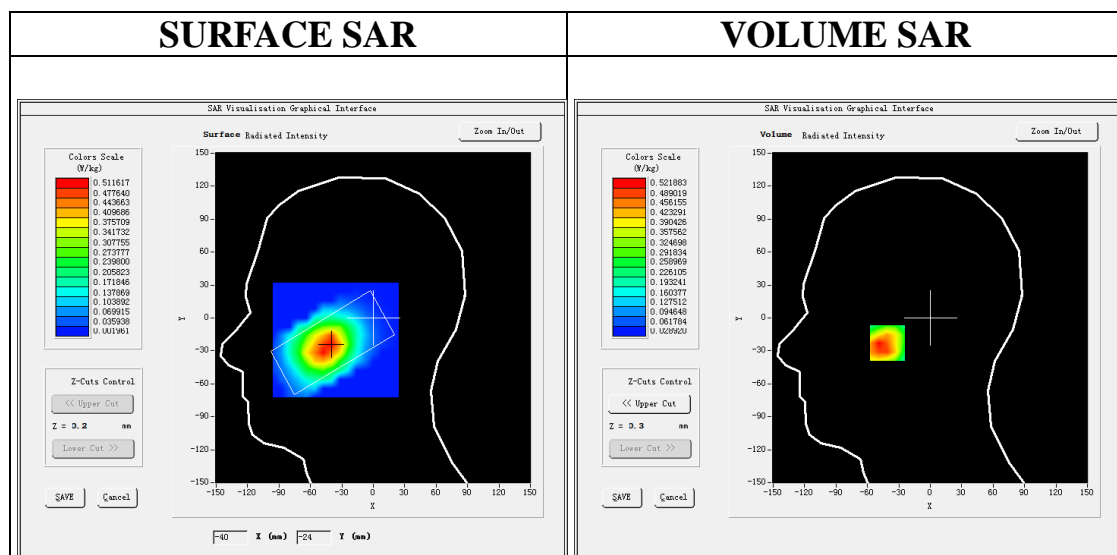
SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/GSM 850 Mid-Touch-Left/Area Scan: Measurement grid: dx=8mm, dy=8mm

Configuration/GSM 850 Mid-Touch-Left/Zoom Scan : Measurement grid: dx=8mm,dy=8mm, dz=5mm

Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Left head
Device Position	Cheek
Band	GSM 850
Channels	Middle
Signal	TDMA (Crest factor: 8.0)



Maximum location: X=-41.00, Y=-23.00

SAR Peak: 0.79 W/kg

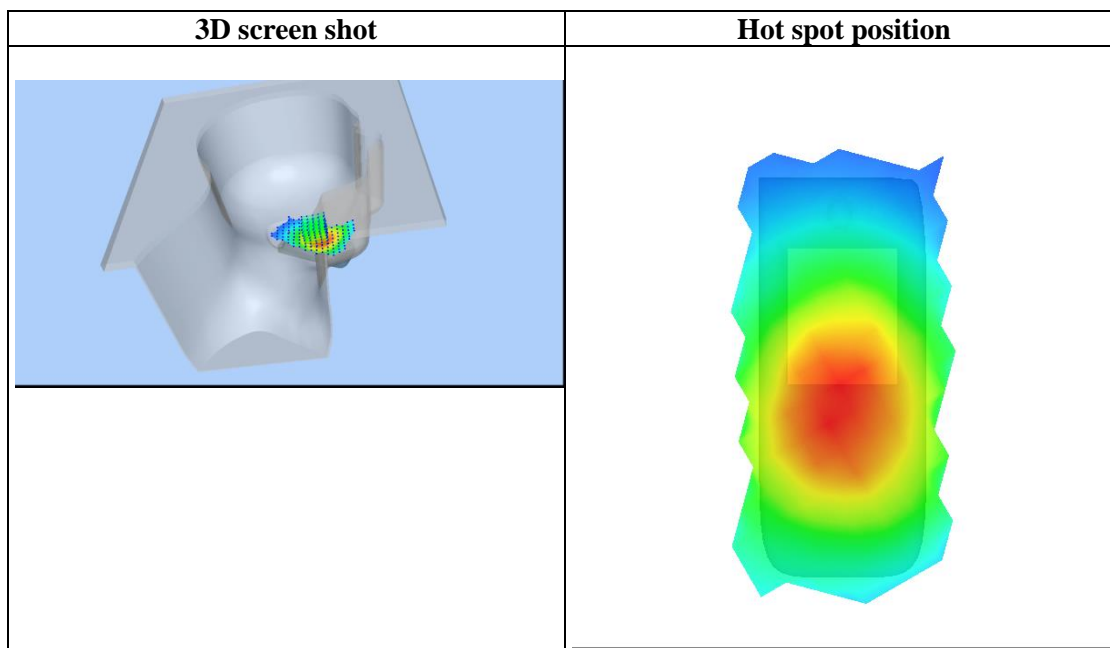
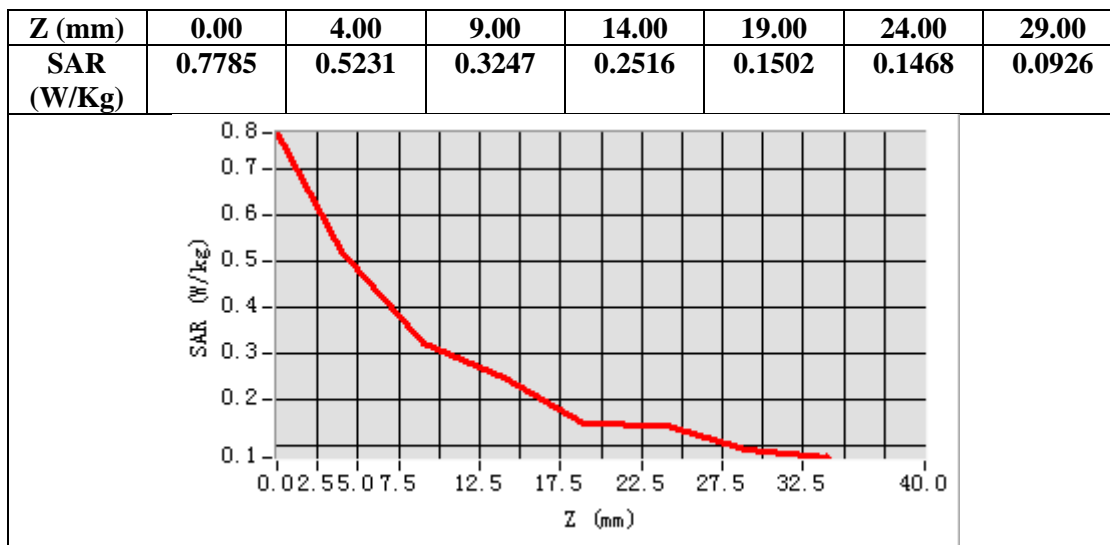
SAR 10g (W/Kg)	0.326934
SAR 1g (W/Kg)	0.505826

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Test Laboratory: AGC Lab
GSM 850 Mid- Body- Back (MS)<SIM 1>
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 01,2022

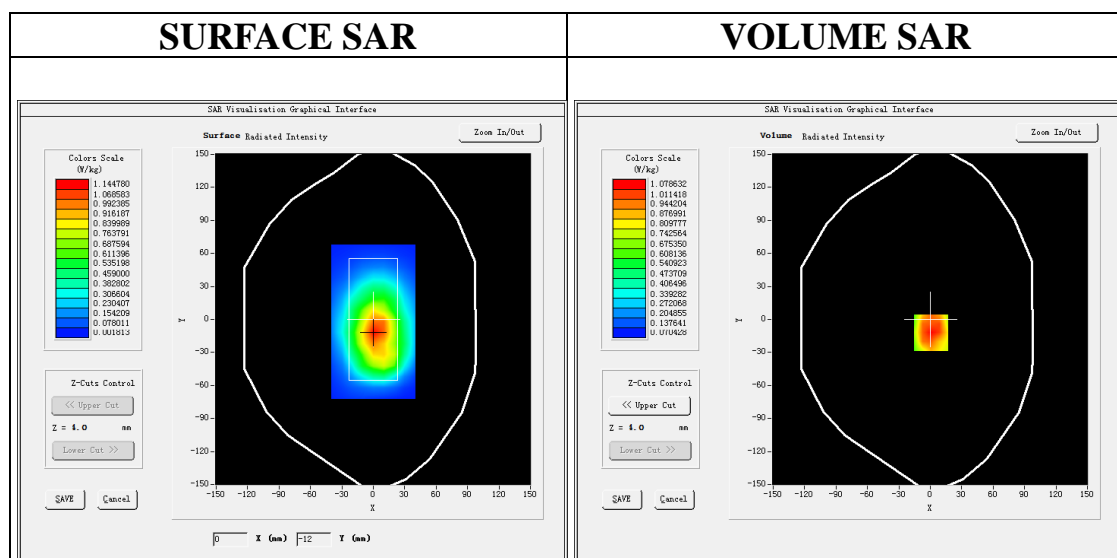
Communication System: Generic GSM; Communication System Band: GSM 850; Duty Cycle: 1:8.3; Conv.F=1.42;
Frequency: 836.6 MHz; Medium parameters used: $f = 835$ MHz; $\sigma = 0.91$ mho/m; $\epsilon_r = 40.23$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.3, Liquid temperature (°C): 22.1

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPG0368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/GSM 850 Mid-Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/GSM 850 Mid-Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	GSM 850
Channels	Middle
Signal	TDMA (Crest factor: 8.0)



Maximum location: X=1.00, Y=-12.00

SAR Peak: 1.56 W/kg

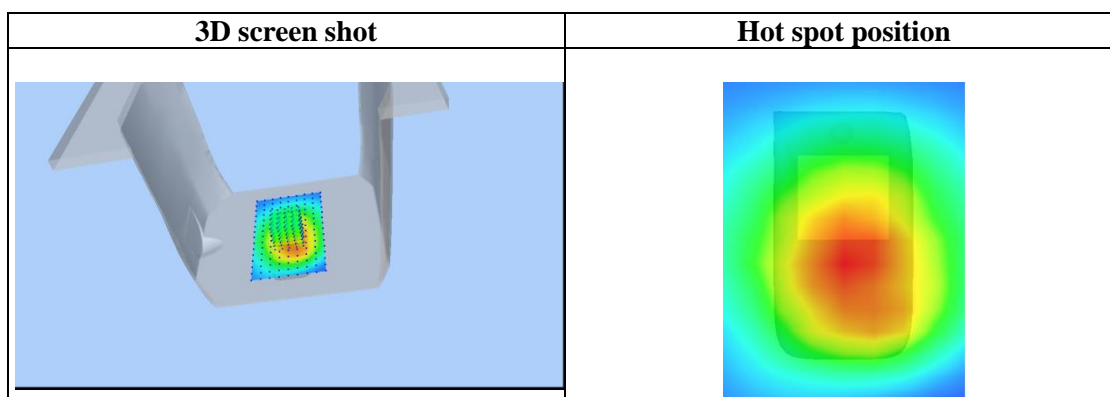
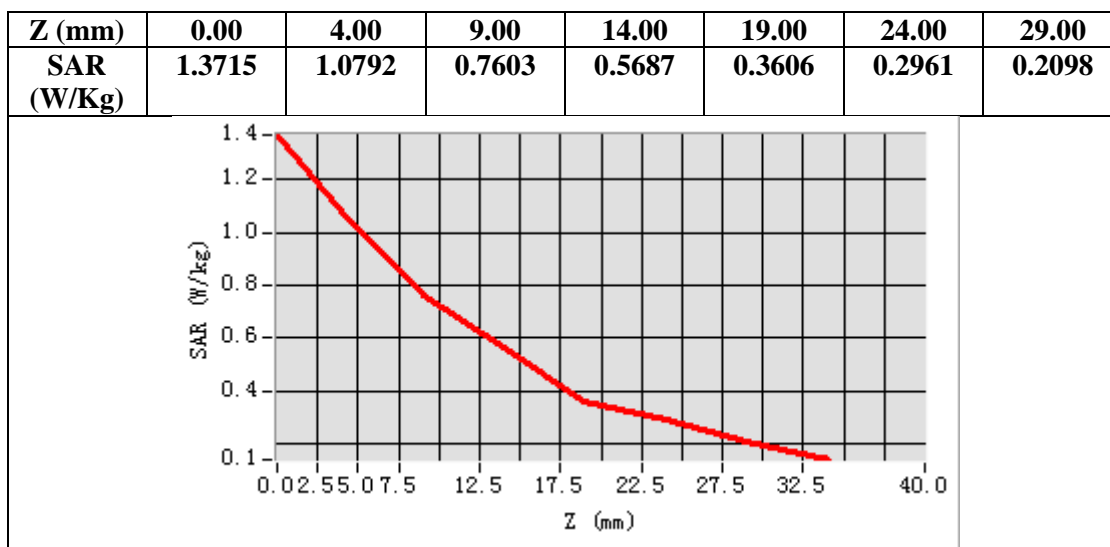
SAR 10g (W/Kg)	0.682975
SAR 1g (W/Kg)	1.041597

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Test Laboratory: AGC Lab
GPRS 850 Mid- Body- Back (2up)
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 01,2022

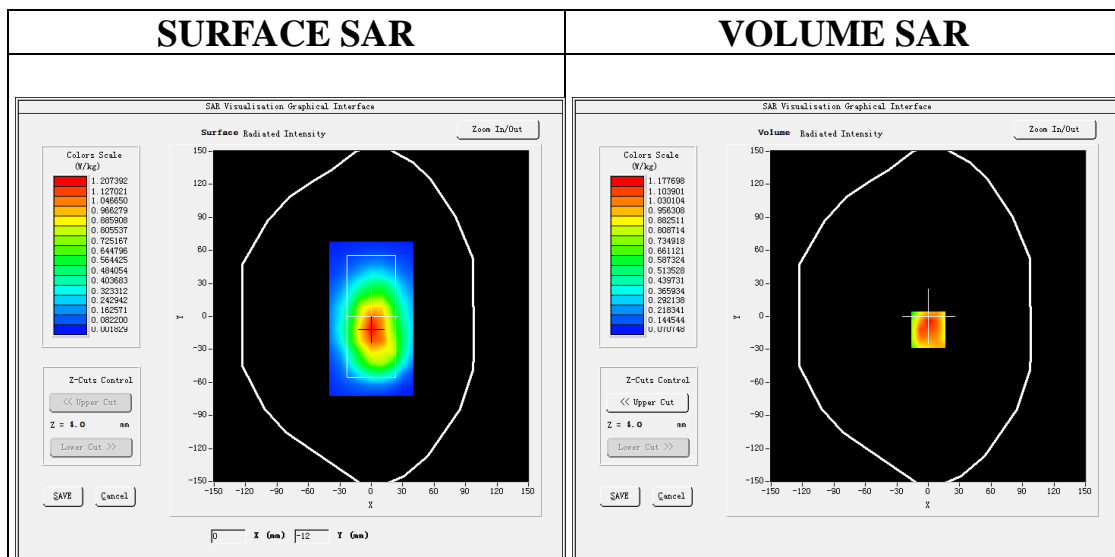
Communication System: GPRS-2 Slot; Communication System Band: GSM 850; Duty Cycle: 1:4.2; Conv.F=1.42;
Frequency: 836.6 MHz; Medium parameters used: $f = 835$ MHz; $\sigma = 0.91$ mho/m; $\epsilon_r = 40.23$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.3, Liquid temperature (°C): 22.1

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPG0368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/GPRS 850 Mid-Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/GPRS 850 Mid-Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	GSM 850
Channels	Middle
Signal	TDMA (Crest factor: 4.0)



Maximum location: X=0.00, Y=-12.00

SAR Peak: 1.81 W/kg

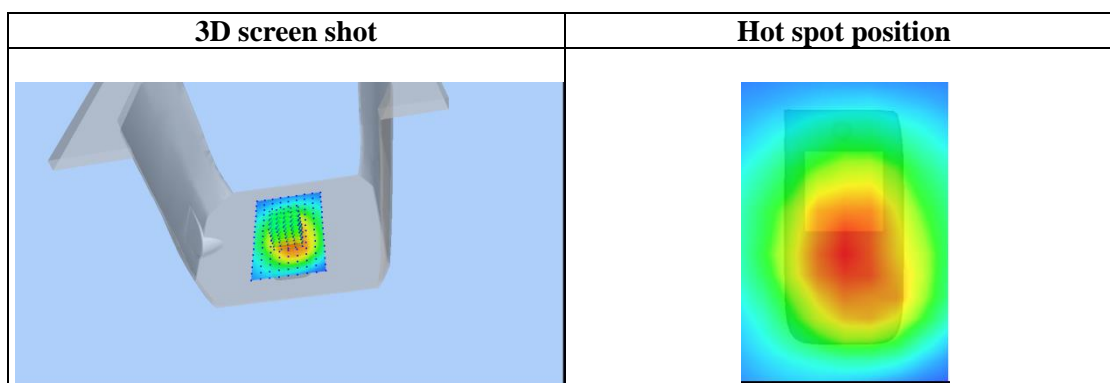
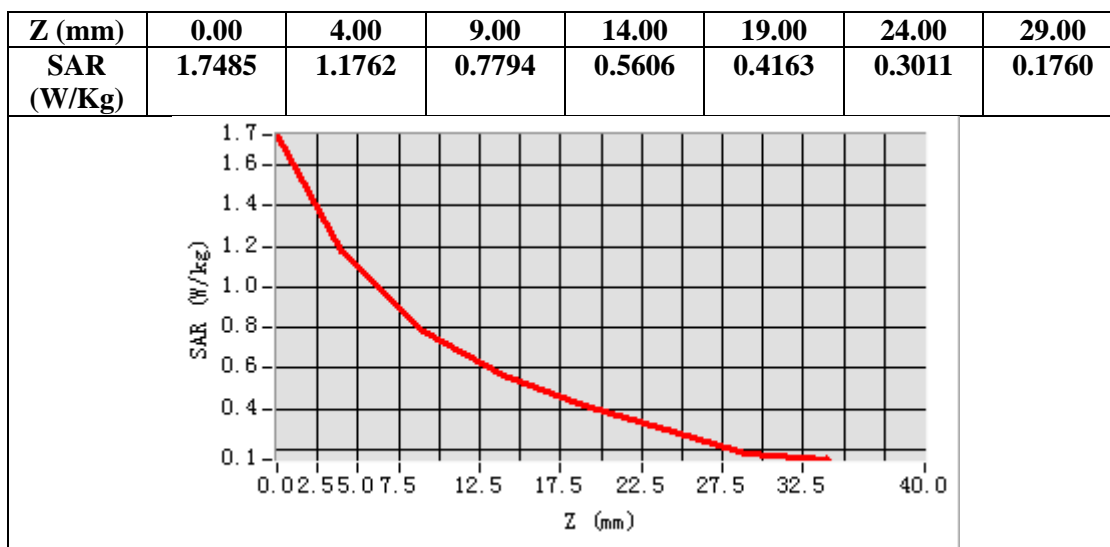
SAR 10g (W/Kg)	0.746349
SAR 1g (W/Kg)	1.145725

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Test Laboratory: AGC Lab
PCS 1900 Mid-Touch-Right <SIM 1>
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 04,2022

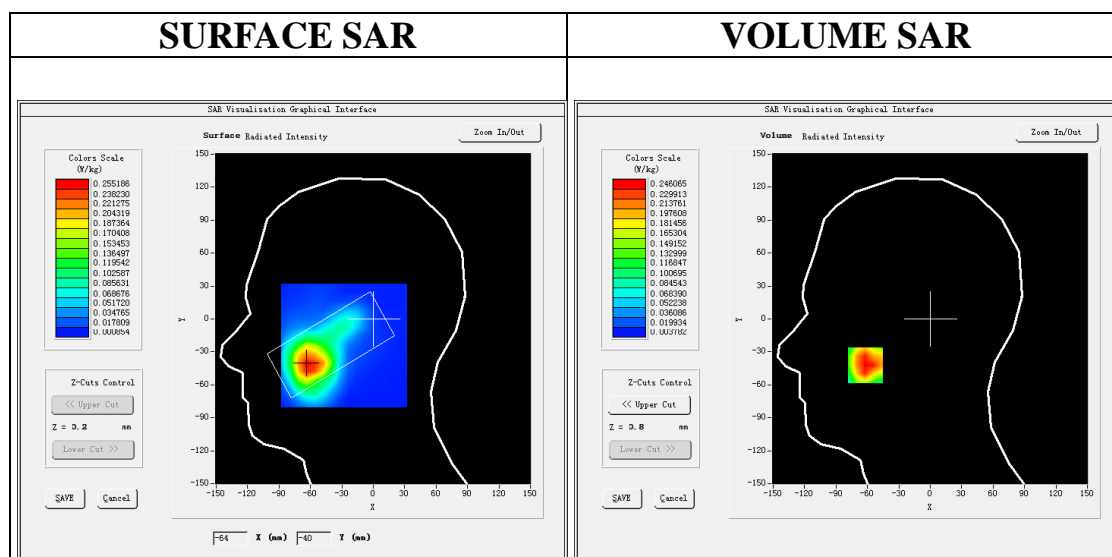
Communication System: Generic GSM; Communication System Band: PCS 1900; Duty Cycle: 1:8.3; Conv.F=1.77;
Frequency: 1880 MHz; Medium parameters used: $f = 1800$ MHz; $\sigma = 1.33$ mho/m; $\epsilon_r = 41.26$; $\rho = 1000$ kg/m³ ;
Phantom section: Right Section
Ambient temperature (°C): 22.1, Liquid temperature (°C): 21.8

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/PCS1900 Mid-Touch-Right/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/PCS1900 Mid-Touch-Right/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Right head
Device Position	Cheek
Band	PCS 1900
Channels	Middle
Signal	TDMA (Crest factor: 8.0)



Maximum location: X=-62.00, Y=-42.00

SAR Peak: 0.44 W/kg

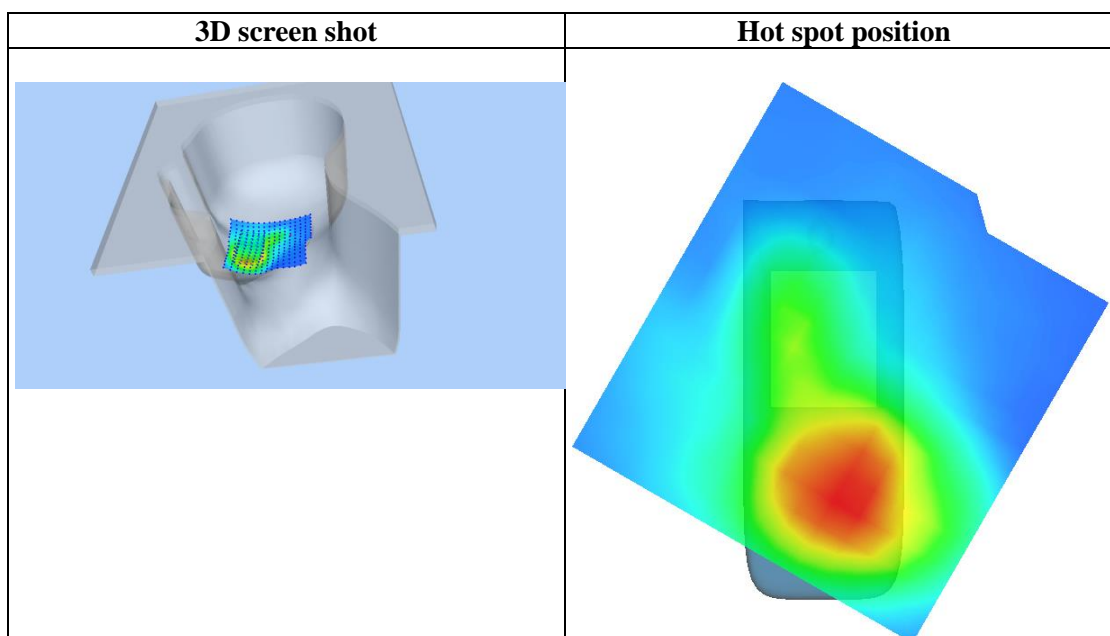
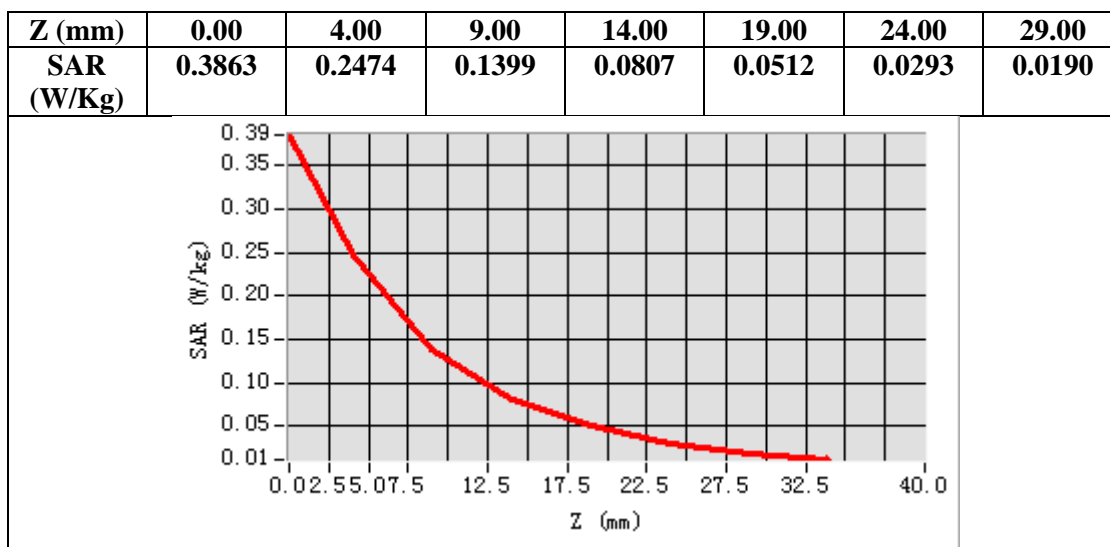
SAR 10g (W/Kg)	0.132571
SAR 1g (W/Kg)	0.243518

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Test Laboratory: AGC Lab
PCS 1900 Low-Body-Back (MS)<SIM 1>
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 04,2022

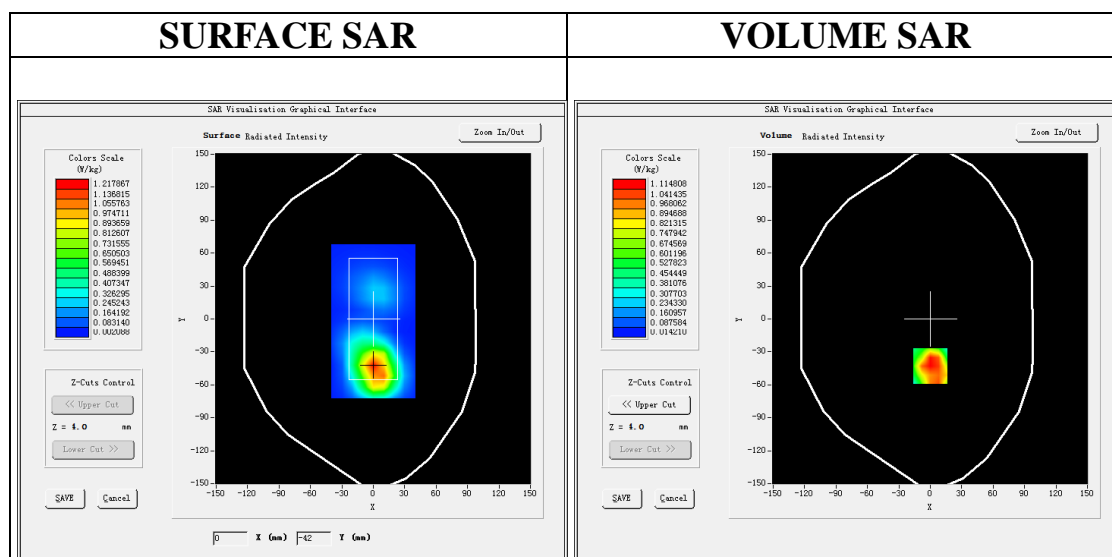
Communication System: Generic GSM; Communication System Band: PCS 1900; Duty Cycle: 1:8.3; Conv.F=1.77;
Frequency: 1850.2 MHz; Medium parameters used: $f = 1800$ MHz; $\sigma = 1.33$ mho/m; $\epsilon_r = 41.26$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.1, Liquid temperature (°C): 21.8

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/PCS1900 Low -Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/PCS1900 Low -Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	PCS 1900
Channels	Low
Signal	TDMA (Crest factor: 8.0)

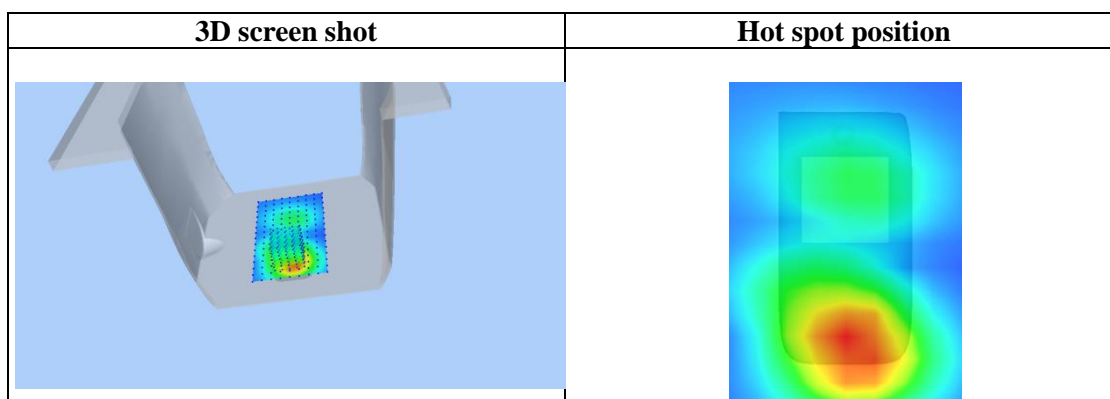
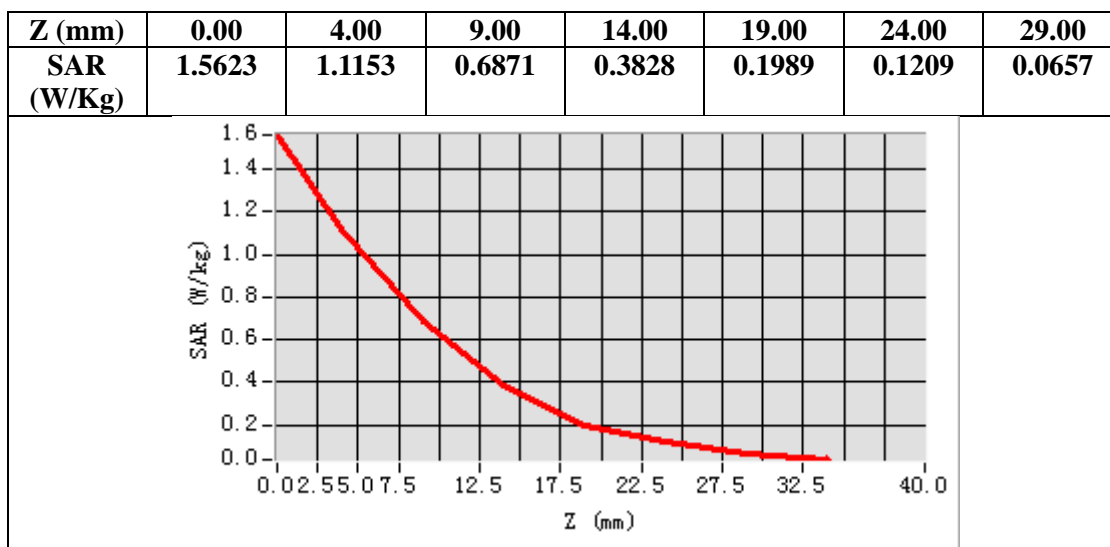


Maximum location: X=0.00, Y=-43.00
SAR Peak: 1.86 W/kg

SAR 10g (W/Kg)	0.568514
SAR 1g (W/Kg)	1.092575

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Test Laboratory: AGC Lab
GPRS 1900 Low-Body-Back (2up)
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 04,2022

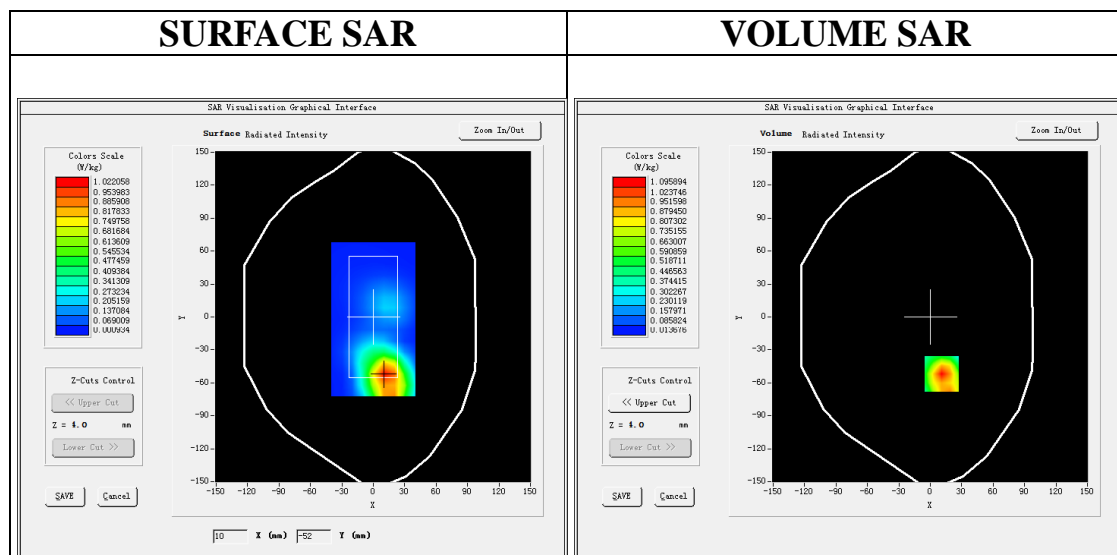
Communication System: GPRS-2Slot; Communication System Band: PCS 1900; Duty Cycle: 1:4.2; Conv.F=1.77;
Frequency: 1850.2 MHz; Medium parameters used: $f = 1800$ MHz; $\sigma = 1.33$ mho/m; $\epsilon_r = 41.26$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.1, Liquid temperature (°C): 21.8

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/GPRS1900 Low -Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/GPRS1900 Low -Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	PCS 1900
Channels	Low
Signal	TDMA (Crest factor: 4.0)



Maximum location: X=11.00, Y=-52.00

SAR Peak: 1.66 W/kg

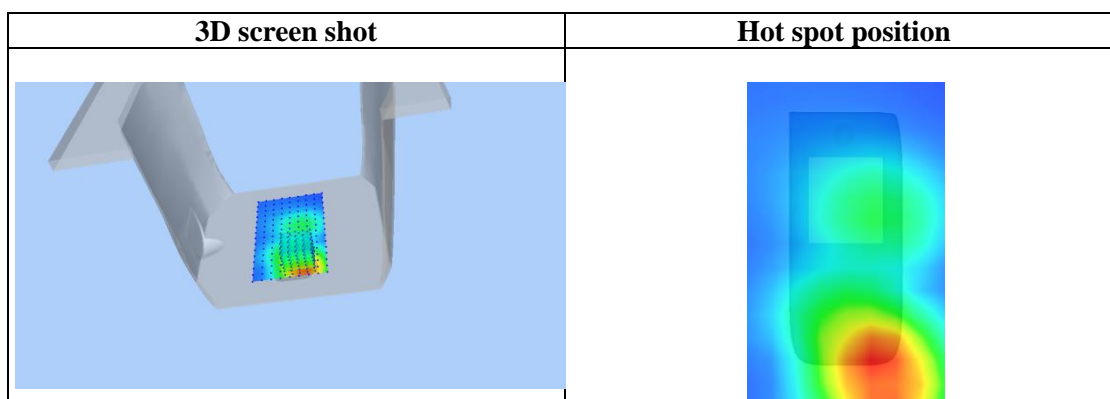
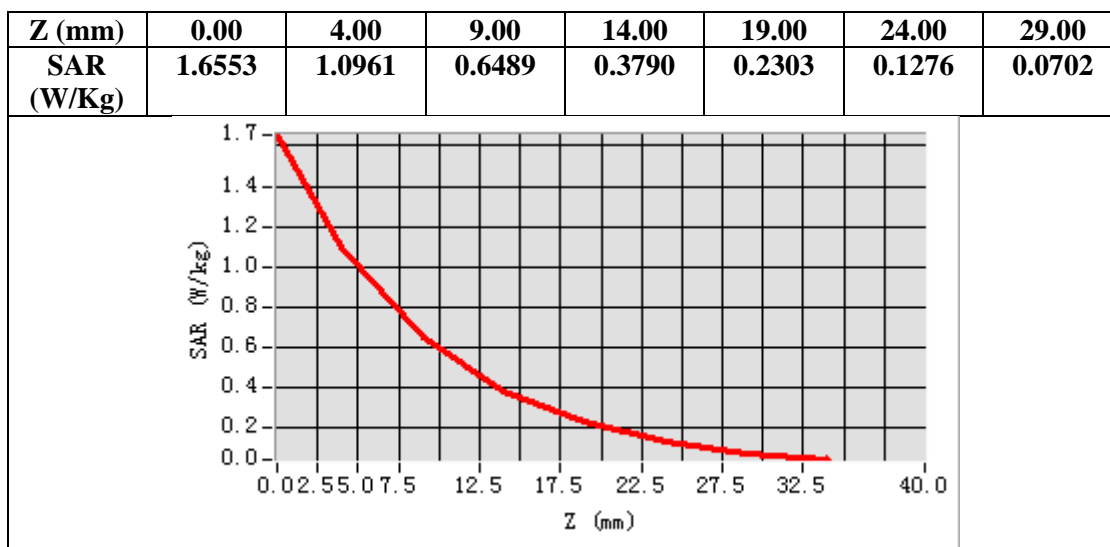
SAR 10g (W/Kg)	0.546286
SAR 1g (W/Kg)	1.008190

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Repeated SAR

Test Laboratory: AGC Lab
GPRS 850 Mid- Body- Back (2up)
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 01,2022

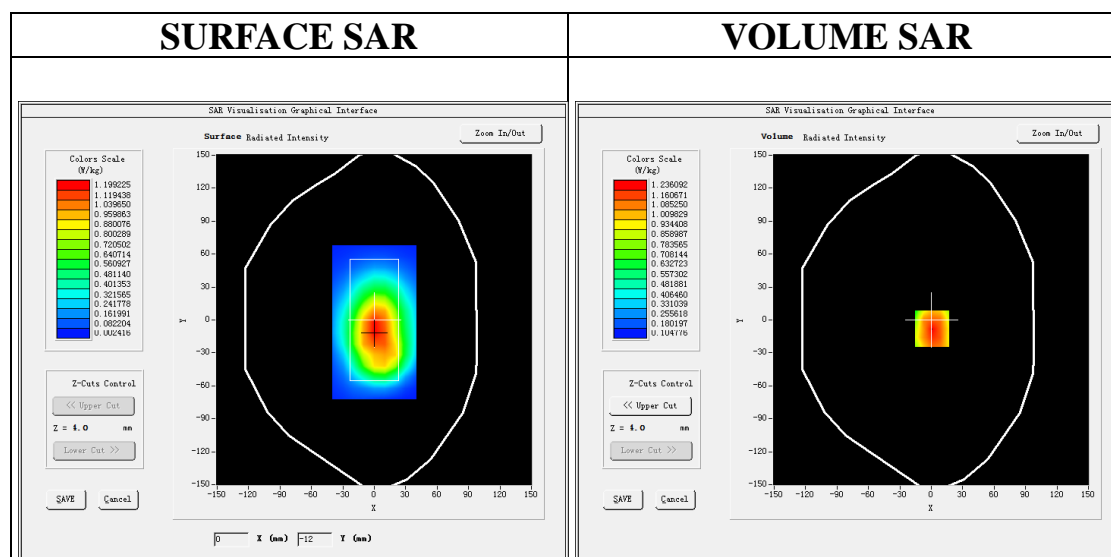
Communication System: GPRS-2 Slot; Communication System Band: GSM 850; Duty Cycle: 1:4.2; Conv.F=1.42;
Frequency: 836.6 MHz; Medium parameters used: $f = 835$ MHz; $\sigma = 0.91$ mho/m; $\epsilon_r = 40.23$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.3, Liquid temperature (°C): 22.1

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/GPRS 850 Mid-Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/GPRS 850 Mid-Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	GSM 850
Channels	Middle
Signal	TDMA (Crest factor: 4.0)



Maximum location: X=1.00, Y=-8.00

SAR Peak: 1.63 W/kg

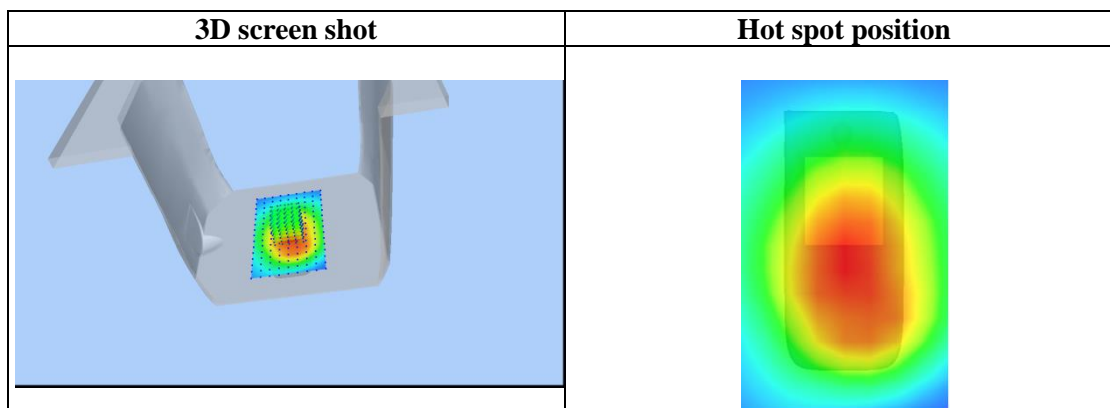
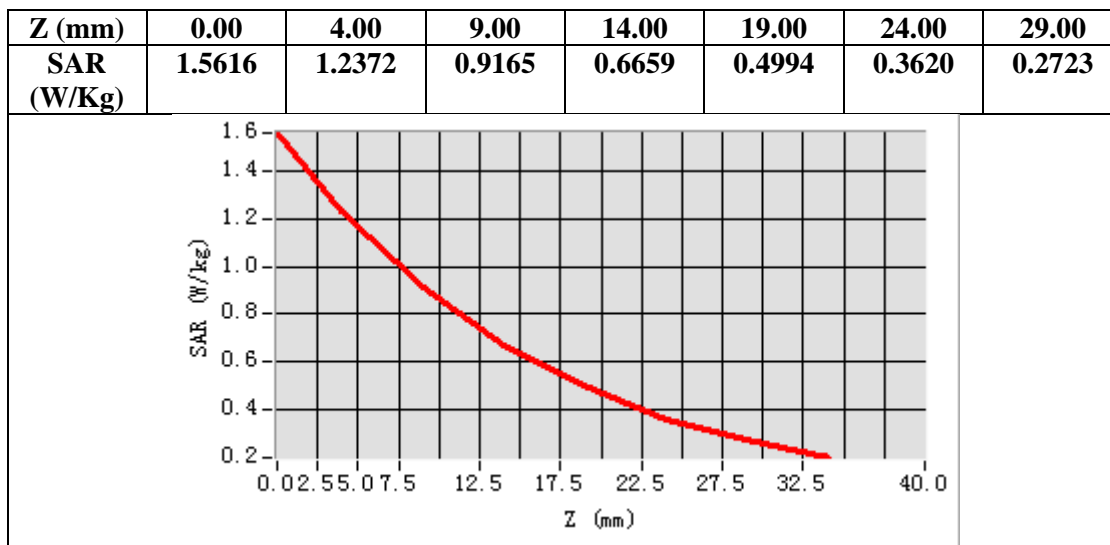
SAR 10g (W/Kg)	0.806389
SAR 1g (W/Kg)	1.125086

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Test Laboratory: AGC Lab
PCS 1900 Low-Body-Back (MS)<SIM 1>
DUT: GSM Feature Phone; Type: Hot

Date: Sep. 04,2022

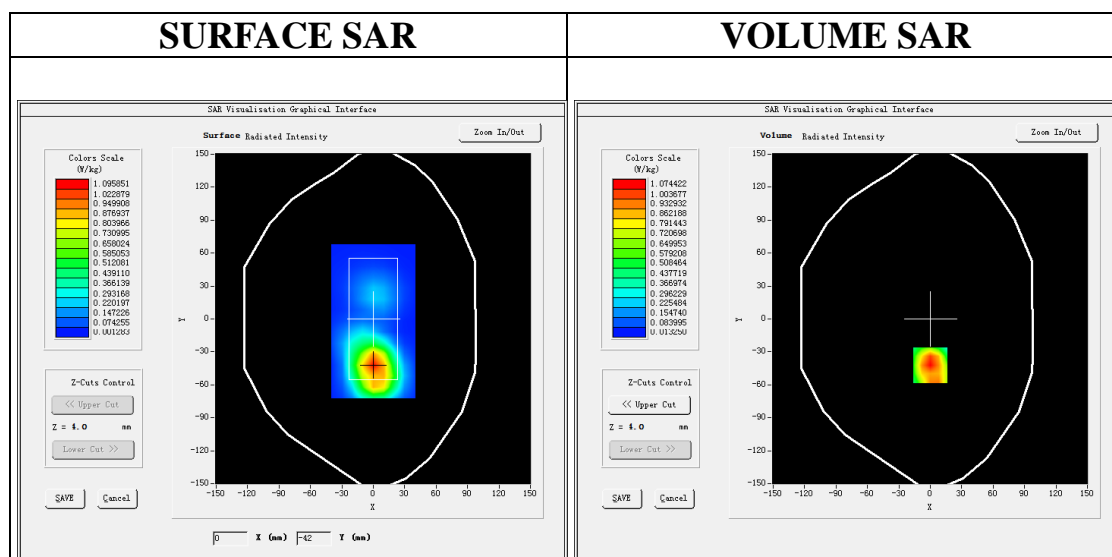
Communication System: Generic GSM; Communication System Band: PCS 1900; Duty Cycle: 1:8.3; Conv.F=1.77;
Frequency: 1850.2 MHz; Medium parameters used: $f = 1800$ MHz; $\sigma = 1.33$ mho/m; $\epsilon_r = 41.26$; $\rho = 1000$ kg/m³ ;
Phantom section: Flat Section
Ambient temperature (°C): 22.1, Liquid temperature (°C): 21.8

SATIMO Configuration:

- Probe: SSE2; Calibrated: Apr. 13, 2022; Serial No.: SN 13/22 EPGO368
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Phantom: SAM twin phantom
- Measurement SW: OpenSAR V4_02_32

Configuration/PCS1900 Low -Body-Back/Area Scan: Measurement grid: dx=8mm, dy=8mm
Configuration/PCS1900 Low -Body-Back/Zoom Scan: Measurement grid: dx=8mm,dy=8mm, dz=5mm;

Area Scan	surf_sam_plan.txt, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body Back
Band	PCS 1900
Channels	Low
Signal	TDMA (Crest factor: 8.0)

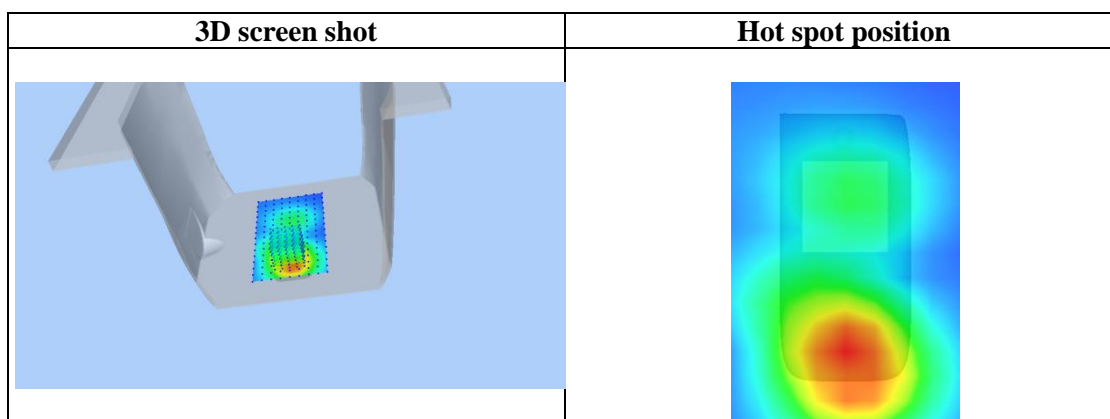
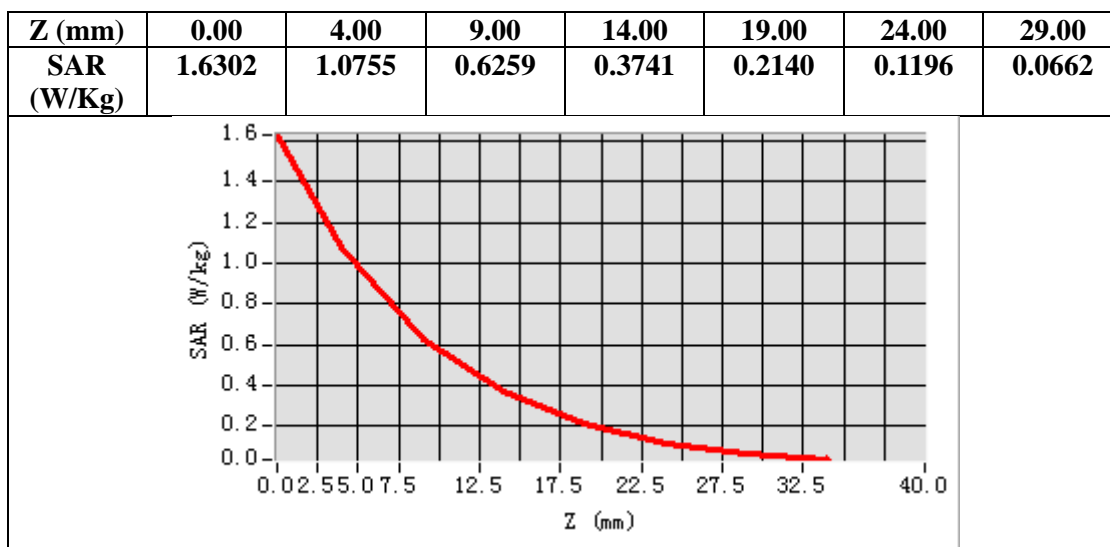


Maximum location: X=0.00, Y=-42.00
SAR Peak: 1.67 W/kg

SAR 10g (W/Kg)	0.565729
SAR 1g (W/Kg)	1.018524

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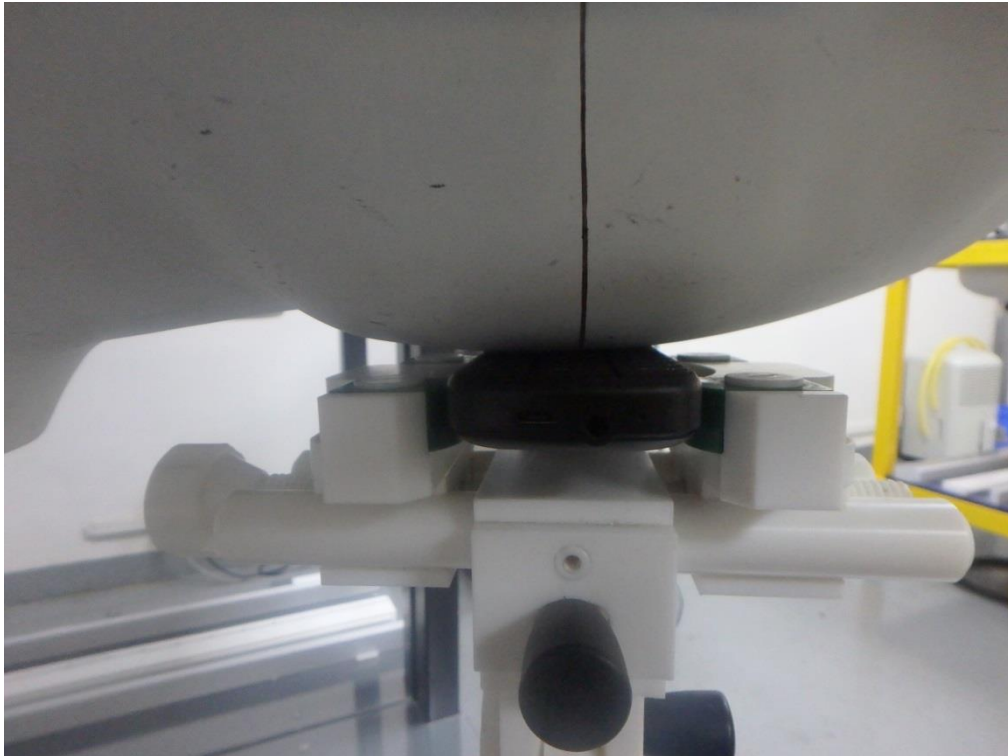
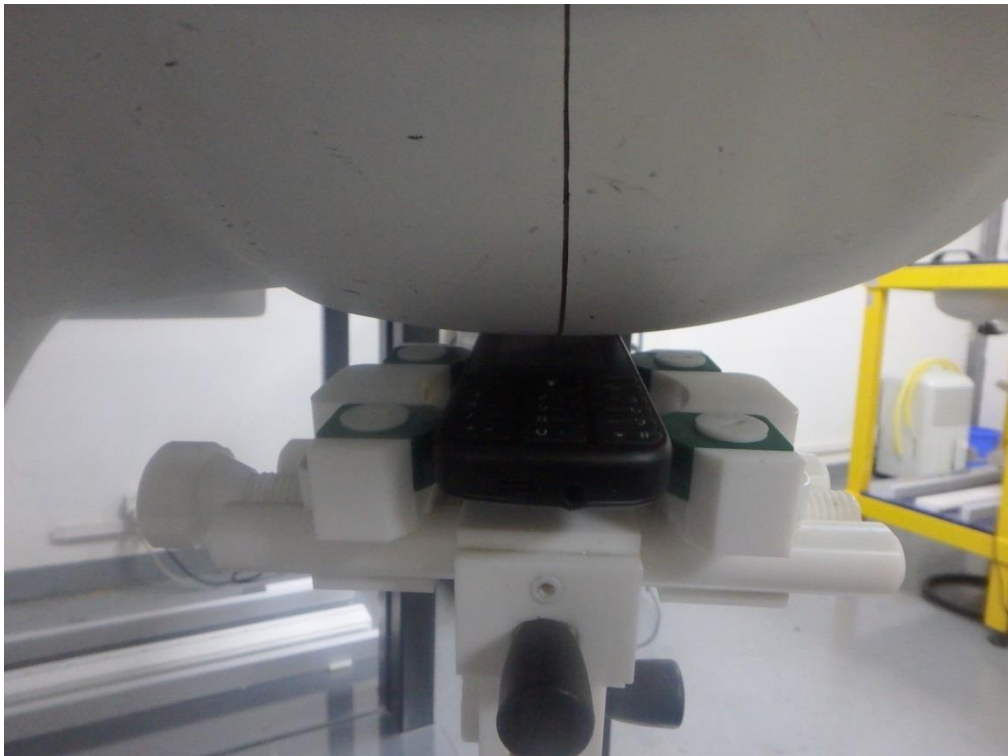
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APPENDIX C. TEST SETUP PHOTOGRAPHS

LEFT- CHEEK TOUCH

LEFT-TILT 15⁰

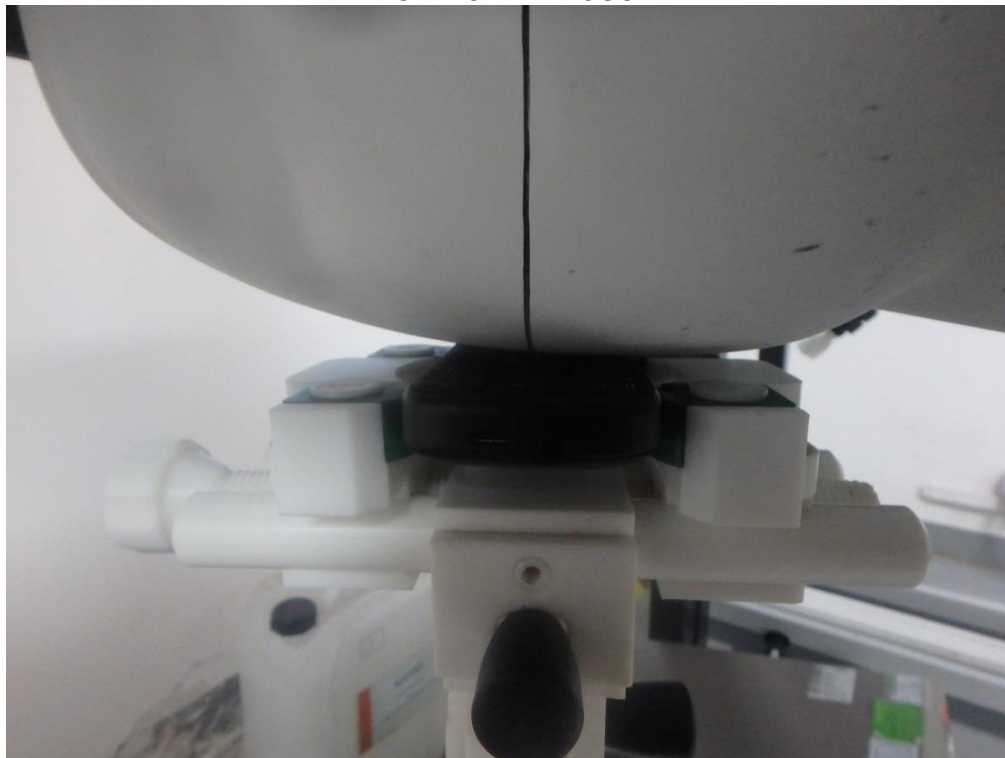
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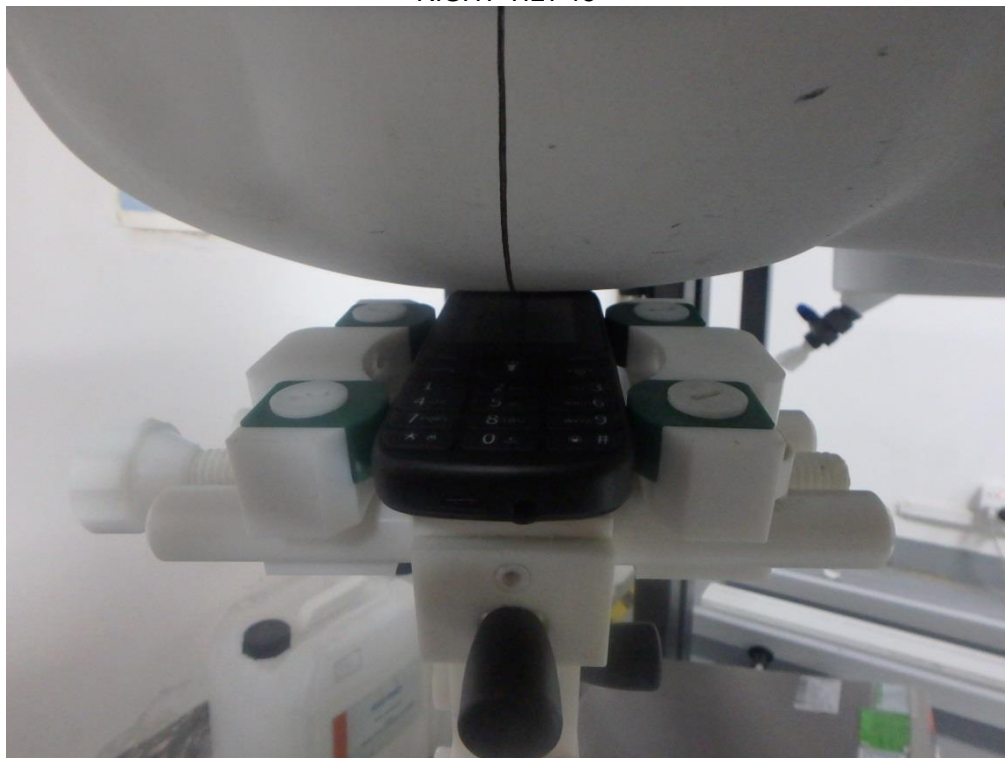
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RIGHT- CHEEK TOUCH



RIGHT-TILT 15°



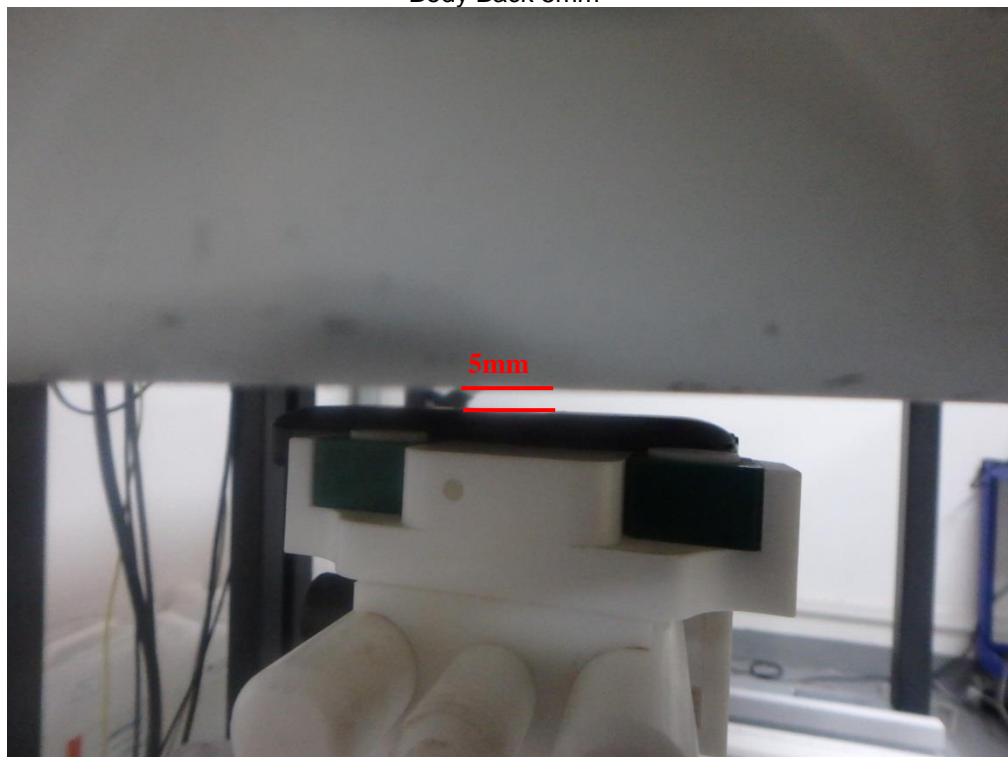
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Body Back 5mm



Body Front 5mm



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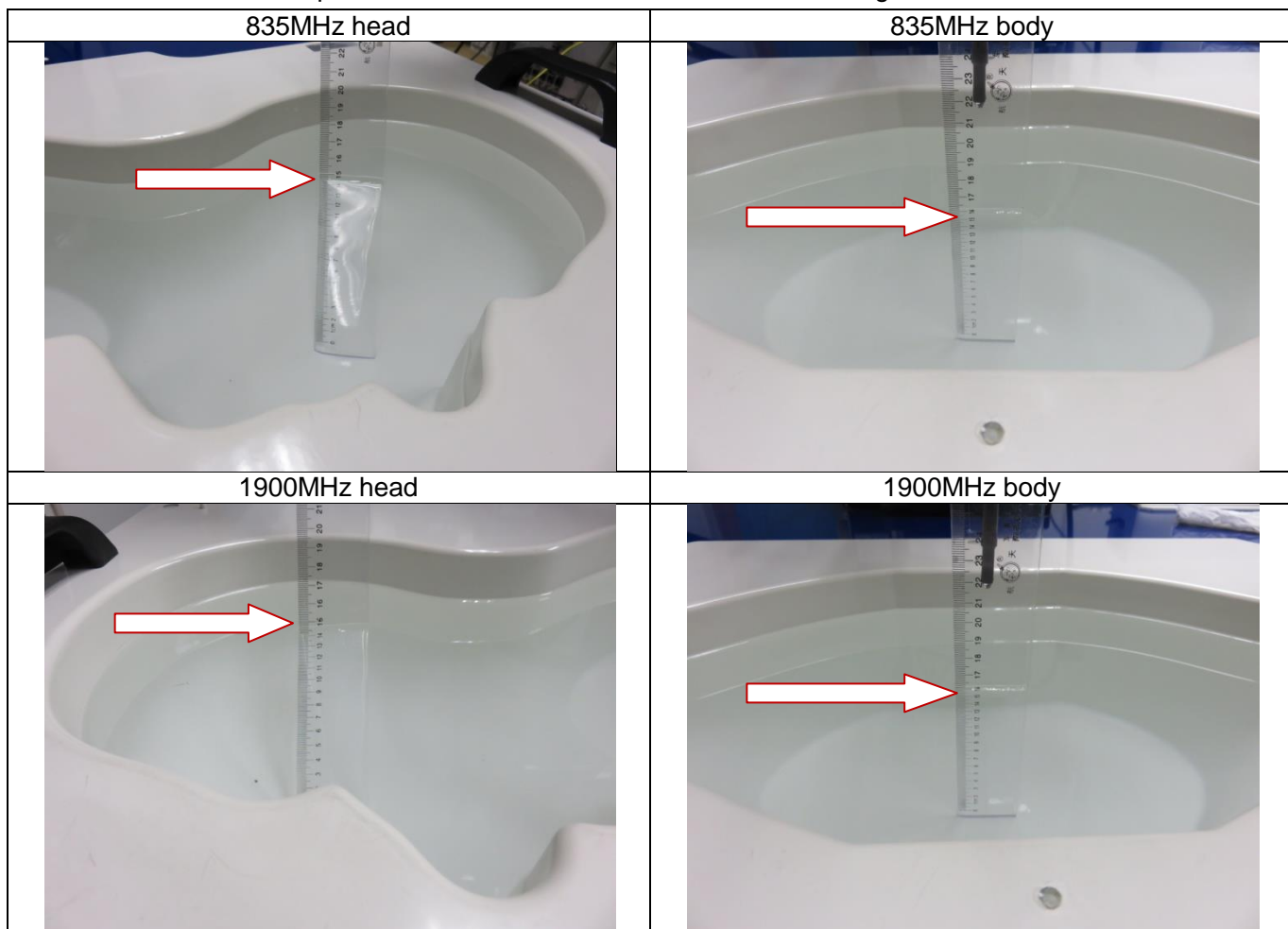
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DEPTH OF THE LIQUID IN THE PHANTOM—ZOOM IN

Note : The position used in the measurement were according to IEEE 1528-2013



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APPENDIX D. CALIBRATION DATA

Refer to Attached files.

----END OF REPORT----

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3. The Company shall not be called or be liable to be called to give evidence or testimony on the Report in a court of law without its prior written consent, unless required by the relevant governmental authorities, laws or court orders.
4. In the event of the improper use of the report as determined by the Company, the Company reserves the right to withdraw it, and to adopt any other additional remedies which may be appropriate.
5. Samples submitted for testing are accepted on the understanding that the Report issued cannot form the basis of, or be the instrument for, any legal action against the Company.
6. The Company will not be liable for or accept responsibility for any loss or damage however arising from the use of information contained in any of its Reports or in any communication whatsoever about its said tests or investigations.
7. Clients wishing to use the Report in court proceedings or arbitration shall inform the Company to that effect prior to submitting the sample for testing.
8. The Company is not responsible for recalling the electronic version of the original report when any revision is made to them. The Client assumes the responsibility to providing the revised version to any interested party who uses them.
9. Subject to the variable length of retention time for test data and report stored hereinto as otherwise specifically required by individual accreditation authorities, the Company will only keep the supporting test data and information of the test report for a period of six years. The data and information will be disposed of after the aforementioned retention period has elapsed. Under no circumstances shall we provide any data and information which has been disposed of after retention period. Under no circumstances shall we be liable for damage of any kind, including (but not limited to) compensatory damages, lost profits, lost data, or any form of special, incidental, indirect, consequential or punitive damages of any kind, whether based on breach of contract of warranty, tort (including negligence), product liability or otherwise, even if we are informed in advance of the possibility of such damages.

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