

## SAR Test Report - New Filing

Applicant:



**President Electronics USA**  
**1007 Collier Center Way**  
**Naples, FL 341100**  
**USA**

FCC ID:

**2AEOCPC209**

Product Model Number / HVIN

**RANDY III FCC**

### Maximum reported 1g SAR

FACE:	0.13	W/kg
BODY:	0.01	
General Pop. Limit:	1.60	

Product Name / PMN

**RANDY III FCC**

In Accordance With:

**FCC 47 CFR §2.1093**

Radiofrequency Radiation Exposure Evaluation: Portable Devices

Approved By:



**Ben Hewson, President**

Celltech Labs Inc.

21-364 Lougheed Rd.

Kelowna, BC, V1X 7R8

Canada



Test Lab Certificate: 2470.01



Industry  
Canada

IC Registration 3874A



FCC Registration: 714830

This report shall not be reproduced in any form without the expressed written consent of Celltech Labs Inc.

## Table of Contents

1.0 REVISION HISTORY .....	4
2.0 CLIENT AND DEVICE INFORMATION .....	5
3.0 SCOPE OF EVALUATION .....	6
4.0 NORMATIVE REFERENCES .....	7
5.0 STATEMENT OF COMPLIANCE .....	8
6.0 SAR MEASUREMENT SYSTEM .....	9
7.0 RF CONDUCTED POWER MEASUREMENT .....	10
TABLE 7.1 CONDUCTED POWER MEASUREMENTS P1 (LITHIUM-ION BATTERY) .....	10
8.0 NUMBER OF TEST CHANNELS ( $N_C$ ) .....	10
9.0 ACCESSORIES EVALUATED .....	11
TABLE 9.1 MANUFACTURER'S ACCESSORY LIST .....	11
10.0 SAR MEASUREMENT SUMMARY .....	12
TABLE 10.1: MEASURED RESULTS – BODY .....	12
TABLE 10.2: MEASURED RESULTS – FACE .....	12
11.0 SCALING OF MAXIMUM MEASURE SAR .....	13
TABLE 11.1 SAR SCALING .....	13
12.0 SAR EXPOSURE LIMITS .....	15
TABLE 12.1 EXPOSURE LIMITS .....	15
13.0 DETAILS OF SAR EVALUATION .....	16
TABLE 13.1 DAY LOG .....	16
13.2 DUT SETUP AND CONFIGURATION .....	17
13.3 DUT POSITIONING .....	17
13.4 GENERAL PROCEDURES AND REPORT .....	18
13.5 FLUID DIELECTRIC AND SYSTEMS PERFORMANCE CHECK .....	19
13.6 SCAN RESOLUTION 100MHZ TO 2GHZ .....	19
13.7 SCAN RESOLUTION 2GHZ TO 3GHZ .....	20
13.8 SCAN RESOLUTION 5GHZ TO 6GHZ .....	20
14.0 MEASUREMENT UNCERTAINTIES .....	21
TABLE 14.1 MEASUREMENT VARIABILITY .....	21
TABLE 14.2 MEASUREMENT UNCERTAINTY .....	21
15.0 FLUID DIELECTRIC PARAMETERS .....	22
TABLE 15.1 FLUID DIELECTRIC .....	22
16.0 SYSTEM VERIFICATION TEST RESULTS .....	23
TABLE 16.1 SYSTEM VERIFICATION RESULTS 30MHZ HEAD TSL .....	23
17.0 SYSTEM VALIDATION SUMMARY .....	24
TABLE 17.1 SYSTEM VALIDATION SUMMARY .....	24
18.0 MEASUREMENT SYSTEM SPECIFICATIONS .....	25
TABLE 18.1 MEASUREMENT SYSTEM SPECIFICATIONS .....	25

<b>19.0 TEST EQUIPMENT LIST</b>	<b>27</b>
TABLE 19.1 EQUIPMENT LIST AND CALIBRATION	27
<b>20.0 FLUID COMPOSITION</b>	<b>28</b>
TABLE 20.1 FLUID COMPOSITION 150MHZ HEAD TSL	28
<b>APPENDIX A – SYSTEM VERIFICATION PLOTS</b>	<b>29</b>
<b>APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR</b>	<b>31</b>
<b>APPENDIX C – SETUP PHOTOS</b>	<b>33</b>
FIGURE C.1 – SETUP PHOTO, BODY – B1	33
FIGURE C.2 – SETUP PHOTO, FACE -F1	33
<b>APPENDIX D – PROBE CALIBRATION</b>	<b>34</b>
<b>APPENDIX E – DIPOLE CALIBRATION</b>	<b>35</b>
<b>APPENDIX F - PHANTOM</b>	<b>36</b>
<b>END OF REPORT</b>	<b>37</b>

## 1.0 REVISION HISTORY

Revision History					
Samples Tested By:		Ben Hewson	Date(s) of Evaluation:		8-9 September 2025
Report Prepared By:		Ben Hewson	Report Reviewed By:		Art Voss
Report Revision	Description of Revision		Revised Section	Revised By	Revision Date
1.0	DRAFT		n/a	-	10 September 2025

## 2.0 CLIENT AND DEVICE INFORMATION

Client Information	
Applicant Name (FCC)	President Electronics USA
Applicant Address (FCC)	1007 Collier Center Way
	Naples, FL, 34110
	USA
DUT Information	
Device Identifier(s):	IC ID: 20240-PC209
Device Type:	Portable Handheld & Mobile AM/FM CBRS Transceiver
Device Model(s) / HVIN:	RANDY III FCC
Device Marketing Name / PMN:	RANDY III FCC
Firmware Version ID Number / FVIN:	V302
Test Sample Serial No.:	T/A Sample #1
Equipment Class (FCC):	Licensed Non-Broadcast Transmitter Held to Face (TNF)
Equipment Class (ISED):	Land Mobile Radio - Portable
Transmit Frequency Range:	26.965 - 27.405 MHz
Test Channels:	40
Manuf. Max. Rated Output Power:	1W & 4W, (30dBm & 36dBm)
Manuf. Max. Rated BW/Data Rate:	8.0kHz
Antenna Make and Model:	Detachable Flex or External Whip
Antenna Type and Gain:	0dBi Typical, 3dBi Max
Modulation:	AM, FM
Mode:	Simplex
DUT Power Source:	7.4VDC Rechargeable Li-Ion
DUT Dimensions [HxWxD] (mm)	152 x 66.5 x 37
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

### 3.0 SCOPE OF EVALUATION

#### Preface:

This Certification Report was prepared on behalf of:

##### President Electronics USA

,(the '*Applicant*'), in accordance with the applicable Federal Communications Commission (FCC) CFR 47 and Innovation, Scientific and Economic Development (ISED) Canada rules parts and regulations (the '*Rules*'). The scope of this investigation was limited to only the equipment, devices and accessories (the '*Equipment*') supplied by the *Applicant*. The tests and measurements performed on this *Equipment* were only those set forth in the applicable *Rules* and/or the Test and Measurement Standards they reference. The *Rules* applied and the Test and Measurement Standards used during this evaluation appear in the Normative References section of this report. The limits set forth in the technical requirements of the applicable *Rules* were applied to the measurement results obtained during this evaluation and ,unless otherwise noted, these limits were used as the Pass/Fail criteria. The Pass/Fail statements made in this report apply to only the tests and measurements performed on only the *Equipment* tested during this evaluation. Where applicable and permissible, information including test and measurement data and/or results from previous evaluations of same or similar equipment, devices and/or accessories may be cited in this report.

#### Device:

The RANDY III FCC is Portable Handheld and Mobile 1W/4W, AM or FM CBRS transceiver. With a detachable antenna, it can be configured as a stand-alone portable handheld device or connected to an external vehicular mounted antenna for mobile applications. This *Equipment* can transmit at a user configurable 1W or 4W transmitter power. This is an application for a Class II Permissive Change. The RF Transceiver of the RANDY III FCC, FCC ID: 2AEOCP209, is identical in all respects to the prior RANDY III FCC, with the exception there have been modifications to the audio section to increase the audio performance.

#### Certification Requirement:

In accordance with FCC 47 CFR Part 2, Subpart J, this *Equipment* is subject to certification to FCC 47 CFR Part 95, Subpart D. In addition, this *Equipment* is subject to a Suppliers Declaration of Conformity (SDoC) in accordance with FCC 47 CFR §15.101.

#### RF Exposure Requirement:

The *Equipment* capable of operating as a Portable or as a Mobile device. The *Equipment* is supplied with a detachable TNC whip antenna as well as a TNC to UHF adapter for connection to an external antenna. As per FCC 47 CFR §2.1091, §2.1093, Canada Health Safety Code 6, RF Exposure evaluations (SAR - Portable, MPE - Mobile) are required for this *Equipment*. When the supplied whip antenna is used for portable applications, the requirements of this SAR report apply. When the *Equipment* is connected to an external antenna for mobile applications, the requirements of the accompanying MPE report apply. This *Equipment* is capable of Voice Activated Transmission (VOX), a 75% transmit duty factor applies.

#### Application:

This is an application for a C2PC FCC certification.

## 4.0 NORMATIVE REFERENCES


Normative References*	
ANSI / ISO 17025	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2	Code of Federal Regulations
Title 47:	Telecommunication
Part 2.1093:	Radiofrequency Radiation Exposure Evaluation: Portable Devices
IEC International Standard /IEEE International Committee on Electromagnetic Safety	
IEC/IEEE 62209-1528	Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 1528; Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)
FCC KDB	
KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB	
KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
* When the issue number or issue date is omitted, the latest version is assumed.	

## 5.0 STATEMENT OF COMPLIANCE

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

<b>Applicant:</b> President Electronics USA		<b>Model / HVIN:</b> RANDY II FCC	
<b>Standard(s) Applied:</b> FCC 47 CFR §2.1093		<b>Measurement Procedure(s):</b> FCC KDB 865664, FCC KDB 447498, IEEE Standard 1528-2020	
<b>Reason For Issue:</b> <input checked="" type="checkbox"/> New Certification <input type="checkbox"/> Class I Permissive Change <input type="checkbox"/> Class II Permissive Change		<b>Use Group:</b> <input checked="" type="checkbox"/> General Population / Uncontrolled <input type="checkbox"/> Occupational / Controlled	
<b>Reason for Change:</b> C2PC Filing		<b>Limits Applied:</b> <input checked="" type="checkbox"/> 1.6W/kg - 1g Volume <input type="checkbox"/> 8.0W/kg - 1g Volume <input type="checkbox"/> 4.0W/kg - 10g Volume	
		<b>Date(s) Evaluated:</b> September 8-9 2025	

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.	
	Ben Hewson Celltech Labs Inc.
	10 September 2025
	Date



## 6.0 SAR MEASUREMENT SYSTEM

### SAR Measurement System

Celltech Labs Inc. SAR measurement facility employs a Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY6 measurement system is comprised of the measurement server, a robot controller, a computer, a near-field probe, a probe alignment sensor, an Elliptical Planar Phantom (ELI) phantom and a specific anthropomorphic mannequin (SAM) phantom for Head and/or Body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller and a teach pendant (Joystick) to control the robot's servo motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical form the DAE to digital electronic signal and transfers data to the DASY6 measurement server. The DAE4 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter, a command decoder and a control logic unit. Transmission to the DASY6 measurement server is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. The sensor systems are also used for mechanical surface detection and probe collision detection. The robot utilizes a controller with built in VME-bus computer.



**DASY 6 SAR System with SAM Phantom**



**DASY 6 Measurement Controller**

## 7.0 RF CONDUCTED POWER MEASUREMENT

Table 7.1 Conducted Power Measurements P1 (Lithium-ion Battery)

Conducted Power Measurement Results (4W):						
Channel Number	Channel Frequency (MHz)	Mode	Modulation	Measured Power [P <sub>Meas</sub> ] (dBm)	Limit [P <sub>Lim</sub> ] (dBm)	Margin (dB)
1	26.97	AM	AM	35.70	36	0.30
20	27.21			35.87		0.13
40	27.41			35.96		0.04
1	26.97	FM	FM	35.67		0.33
20	27.21			35.89		0.11
40	24.41			35.97		0.03
Result:					Complies	

$$\text{Margin} = P_{\text{Limit}} - P_{\text{Meas}}$$

\*The Measured power for the higher power Tx 4W mode and Rated power (tune-up tolerance) are stated for typical transmission modes. Some modes may produce lower than rated conducted power levels. Power measurements taken across the various channels did not produce levels in excess of the Rated Power plus Tolerance. SAR was evaluated considering the AM and FM mode at the Maximum output power level setting and prior SAR results and produced the most conservative SAR. The reported SAR was not scaled down.

## 8.0 NUMBER OF TEST CHANNELS ( $N_C$ )

Number of Required Test Channels						
Frequency			Number of Channels		Spacing	
$f_{\text{Low}}$ (MHz)	$f_{\text{High}}$ (MHz)	$f_c$ (MHz)	KDB 447498 ( $N_C$ )	IEC 62209 ( $N_C$ )	KDB 447498 (MHz)	IEC 62209 (MHz)
26.965	27.405	27.185	1	3		0.2
<p>KDB 447498: <math>N_C = \text{RoundUp} \{ [ 100 ( F_{\text{HIGH}} - F_{\text{LOW}} ) / F_c ]^{0.5} \times ( F_c / 100 )^{0.2} \}</math></p> <p>IEC 62209-1: <math>N_C = 2 \times \{ \text{RoundUp} [ 10 ( F_{\text{HIGH}} - F_{\text{LOW}} ) / F_c ] \} + 1</math></p>						

The number of channels tested was based on Low, Mid and High CB Channels with consideration for highest power channel and prior SAR testing results.

## 9.0 ACCESSORIES EVALUATED

Table 9.1 Manufacturer's Accessory List

Manufacturer's Accessory List				
Test Report ID Number	Manufacturer's Part Number	Description	SAR Evaluated	SAR Tested
<b>Antenna Accessory</b>				
T1	–	Flexible Antenna	Y	Y
<b>Battery Accessory</b>				
P1	–	Lithium-ion Rechargeable Battery	Y	Y
P2	–	DC Power Supply with Lithium-ion Rechargeable Battery	Y	N
<b>Body-Worn Accessory</b>				
B1	–	Plastic Belt-Clip	Y	Y
<b>Audio Accessory</b>				
A1	–	Speaker-Microphone ( Representative Sample)	Y	Y

## 10.0 SAR MEASUREMENT SUMMARY

Table 10.1: Measured Results – BODY

Measured 1g SAR Results - BODY Configuration															
Date	Plot ID	Test Frequency (MHz)	DUT Configuration			Accessories	Spacing		Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported SAR (W/kg)</u>
			Pos	Mode	Mod		DUT (mm)	Antenna (mm)							
9/9/2025	B1	27.405	BODY	FM	FM	P1 T1 B1 A1	0	50	0.010	1.600	-0.030	1.000	1.034	75.000	0.008
9/9/2025	B2	26.965	BODY	FM	FM	P1 T1 B1 A1	0	50	0.015	-0.060	-0.330	1.000	1.034	75.000	0.013
9/9/2025	B3	27.405	BODY	FM	FM	P1 T1 B1 A1	0	50	0.012	1.650	-0.030	1.000	1.034	75.000	0.010
Applicable SAR Limit						Use Group						Limit			
FCC CFR 2.1093			Health Canada Safety Code 6			General Population/User Unaware						1.6 W/kg			

Table 10.2: Measured Results – FACE

Measured 1g SAR Results - FACE Configuration															
Date	Plot ID	Test Frequency (MHz)	DUT Configuration			Accessories	Spacing		Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported SAR (W/kg)</u>
			Pos	Mode	Mod		DUT (mm)	Antenna (mm)							SAR
9/9/2025	F1	27.405	FACE	FM	FM	P1 T1 --	25	45	0.162	1.810	-0.030	1.000	1.034	75.000	0.127
9/9/2025	F2	26.965	FACE	FM	FM	P1 T1 --	25	45	0.015	3.530	-0.330	1.000	1.034	75.000	0.013
9/9/2025	F3	27.405	FACE	AM	AM	P1 T1 --	25	45	0.012	3.850	-0.040	1.000	1.034	75.000	0.009
Applicable SAR Limit						Use Group					Limit				
FCC CFR 2.1093			Health Canada Safety Code 6			General Population/User Unaware					1.6 W/kg				

## 11.0 SCALING OF MAXIMUM MEASURE SAR

Table 11.1 SAR Scaling

Scaling of Maximum Measured SAR (1g)				
Measured Parameters		Configuration		
		Body	Face	
Plot ID		B2	F1	
Maximum Measured SAR <sub>M</sub>		0.015	0.162	(W/kg)
Frequency		26.965	27.405	(MHz)
Drift	Power Drift	-0.060	1.810 (2)	(dB)
Conducted Power		35.670	35.970	(dBm)
DC	Transmitter Duty Cycle	(1)	(3)	(%)
DF	Use Duty Factor	75.0	75.0	(%)
Fluid Deviation from Target				
Δe	Permittivity	-8.74%	-8.82%	
Δσ	Conductivity	-6.67%	-6.67%	
Fluid Sensitivity Calculation (1g) IEC/IEEE 62209-1528 7.8.2				
Delta SAR = Ce * Δe + Cσ * Δσ				(8)
Ce = (-0.0007854*f <sup>3</sup> ) + (0.009402*f <sup>2</sup> ) - (0.02742*f) - 0.2026				(9)
Cσ = (0.009804*f <sup>3</sup> ) - (0.08661*f <sup>2</sup> ) + (0.02981*f) + 0.7829				(10)
f	Frequency (GHz)	0.026965	0.027405	
Ce		-0.203	-0.203	
Cσ		0.784	0.784	
Ce * Δe		0.018	0.018	
Cσ * Δσ		-0.052	-0.052	
ΔSAR		-0.034	-0.034	(%)
Manufacturer's Tuneup Tolerance				
Measured Conducted Power		35.670	35.970	(dBm)
Rated Conducted Power		36.000	36.000	(dBm)
ΔP		-0.330	-0.030	(dB)
Transmitter Duty Cycle [Crest Factor]				
Transmitter Duty Cycle (DC)		100.0	100.0	(%)
CF (1/DC)		1.00 (1)	1.00 (3)	
SAR Adjustment for Fluid Sensitivity				
SAR <sub>1</sub> = SAR <sub>M</sub> X [ΔSAR]		0.016	0.168	(W/kg)
SAR Adjustment for Tuneup Tolerance				
SAR <sub>2</sub> = SAR <sub>1</sub> + [ΔP]		0.017	0.169	(W/kg)
SAR Adjustment for Drift				
SAR <sub>3</sub> = SAR <sub>2</sub> + [Drift]		0.017	0.169 (2)	(W/kg)
SAR Adjustment for Transmitter Duty Cycle [Crest Factor]				
SAR <sub>4</sub> = SAR <sub>3</sub> x [CF]		0.017 (1)	0.169 (3)	(W/kg)
SAR Adjustment for Use Duty Factor				
SAR <sub>5</sub> = SAR <sub>4</sub> x [DF]		0.013	0.127	(W/kg)
reported 1g SAR				
reported SAR		0.01	0.13	(W/kg)

\*Fluid dielectric targets above and below 30MHz are not publish. Fluid deviation is based on the 30MHz target.

#### NOTES to Table

Scaling of the Maximum Measured SAR is based on the highest Face, Body, Extremity and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters, Drift, Conducted Power, Duty Cycle [Crest] and Use Duty Factor apply only to those test frequencies and configurations producing the highest SAR. The reported SAR is the accumulation of all SAR Adjustments from the applicable steps above. The Plot ID is for identification of the SAR Measurement Plot(s) in the Annexes of this report.

NOTE: The above adjustments have been applied to ALL Measured SAR values. In some cases, the highest Measure SAR may not have produced the highest reported SAR after all adjustments have been made.

NOTE: Some of the above adjustments may not be applicable to each configuration. They are identified by grayed fields.

#### SAR<sub>1</sub>

Per IEC/IEEE 62209-1528, FCC KDB 865664, ISSED RSS-102 and ISSED Notice 2012-DRS0529, SAR adjustment is applied when the calculated  $\Delta$ SAR, resulting from the equations indicated, is negative (-).

$\Delta$ SAR is given as a percentage (%). The SAR is MULTIPLIED by this scaling factor only when the scaling factor is negative (-).

#### SAR<sub>2</sub>

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, adjustment is required only when the difference ( $\Delta$ P) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative.

$\Delta$ P is given in dB. The absolute value of  $\Delta$ P is ADDED (logarithmically) to the SAR when  $\Delta$ P is negative (-).

#### SAR<sub>3</sub>

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, adjustment is required only when Measured Drift is negative (-). The absolute value of Measured Drift is ADDED (logarithmically) to the SAR.

Drift is given in dB. The absolute value of Drift is ADDED (logarithmically) to the SAR when Drift is negative (-).

#### SAR<sub>4</sub>

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, when the transmit Duty Cycle (DC) is less than 100%, the reported SAR must be scaled to 100% by the Crest Factor (CF).  $CF = 1/DC$  where DC is in decimal.

CF is given as a decimal. The SAR is MULTIPLIED by this scaling factor only when the scaling factor is greater than 1.

#### SAR<sub>5</sub>

Use Duty Factor applies to Push-To-Talk (PTT) transceivers or other devices whereby the user has some control of the transmitter on-off period. Per IEC/IEEE 62209-1528, FCC KDB 447498, FCC KDB 643646 and ISSED RSS-102, a Duty Factor (DF) of 50% may be applied. In cases where Voice Activated transmit is employed, a DF of 75% may be applied.

DF is given as a percentage (%). The SAR is MULTIPLIED by this scaling factor only when the scaling factor is less than 100%.

#### reported SAR

The reported SAR is the Maximum SAR after all applicable adjustments have been made and is indicated on the cover page of this report.

Note (1): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.

Note (2): Power Drift is Positive, Drift Adjustment not Required.

Note (3): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.

## 12.0 SAR EXPOSURE LIMITS

Table 12.1 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure <sup>(4)</sup>	Occupational / Controlled Exposure <sup>(5)</sup>
Spatial Average <sup>(1)</sup> (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak <sup>(2)</sup> (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak <sup>(3)</sup> (Hands/Wrists/Feet/Ankles averaged over 10 g)		4.0 W/kg	20.0 W/kg
(1) The Spatial Average value of the SAR averaged over the whole body.			
(2) The Spatial Peak value of the SAR averaged over any 1 gram of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.			
(3) The Spatial Peak value of the SAR averaged over any 10 grams of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.			
(4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.			
(5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.			

## 13.0 DETAILS OF SAR EVALUATION

Table 13.1 Day Log

DAY LOG					Fluid Dielectric	SPC	Test	
Date	Ambient Temp (° C)	Fluid Temp (° C)	Relative Humidity (%)	Barometric Pressure (kPa)				
9/8/2025	24.0	23.9	32%	101.2	X	X	X	30MHz
9/9/2025	23.8	23.7	43%	101.0			X	30MHz

Per IEEE1528 Test series was started within 24 hours and completed within 48 hours of Fluid Parameter Measurement



## 13.2 DUT Setup and Configuration

DUT Setup and Configuration	
Overview	<p>The RANDY III FCC was evaluated for SAR in the <i>Body</i> and <i>Face</i> configuration at the maximum conducted output power level, preset by the manufacturer, with a fully charged battery in unmodulated continuous transmit operation (AM/FM mode at 100% duty cycle) with the transmit key continuously depressed. For a Push-To-Talk (PTT) device with VOX enabled operation, a 75% duty cycle compensation for the <u>reported SAR</u> was used, as per FCC KDB 447498.</p> <p>The test procedures outlined in FCC KDB 447498, FCC KDB 865664, ISED RSS-102 and IEC/IEEE 62209-1528 were used throughout the evaluation of this device.</p>

## 13.3 DUT Positioning

DUT Positioning	
Positioning	<p>The DUT Positioner was securely fastened to the Phantom Platform. Registration marks were placed on the DUT and the Positioner to ensure consistent positioning of the DUT for each test evaluation.</p>
FACE Configuration	<p>The DUT was securely clamped into the device holder with the surface of the DUT normally held to the user's face facing the phantom. The device holder was adjusted to ensure that the horizontal axis of the DUT was parallel to the bottom of the phantom. A 25mm spacer block was used to set the separation distance between the DUT and the phantom to 25mm. When applicable and unless by design, the antenna of the DUT was prevented from sagging away from the phantom. The spacer block was removed before testing.</p>
BODY Configuration	<p>Body-Worn and Audio Accessories were affixed to the DUT in the manner in which they are intended to be used. The DUT, with its accessories, were securely clamped into the device holder with the surface of the DUT normally in contact with the body in direct contact with the bottom of the phantom, or 0mm separation from the DUT's accessory to the phantom. Body-Worn Accessory straps, linkages, etc. were positioned in a fashion resembling that for which they were intended to be used. Audio Accessory cables, etc., were positioned in a fashion resembling that for which they were intended to be used.</p>
HEAD Configuration	<p>This device is not intended to be held to the ear and was not tested in the HEAD configuration.</p>

## 13.4 General Procedures and Report

General Procedures and Reporting	
<b>General Procedures</b>	<p>The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to <math>\pm 0.5^{\circ}\text{C}</math>. The Active TSL temperature was maintained to within <math>\pm 1.0^{\circ}\text{C}</math> throughout the test series. TSL analysis and SPC were repeated when the Active TSL use exceeded 84 hours.</p> <p>An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the <u>Maximum Distance to Phantom Surface</u> to the fluid surface was performed following the power drift measurement.</p>
<b>Reporting</b>	<p>The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the 100% DC (Duty Cycle) column are the SAR values reported by the SAR Measurement Server with the DUT operating at 100% transmit duty cycle. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance.</p> <p>In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY configuration, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are <u>ONLY</u> scaled up, not down. The final results of this scaling is the <u>reported SAR</u> which appears on the Cover Page of this report.</p>

### 13.5 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
<b>Fluid Dielectric Measurement Procedure</b>	<p>The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running Aprel Dielectric Property Measurement System. A frequency range of <math>\pm 100\text{MHz}</math> for frequencies <math>&gt; 300\text{MHz}</math>, <math>\pm 50\text{MHz}</math> for frequencies <math>\leq 300\text{MHz}</math> and <math>\pm 20\text{MHz}</math> for frequencies <math>\leq 30\text{MHz}</math> with frequency step size of <math>10\text{MHz}</math> (<math>5\text{MHz}</math> below <math>100\text{MHz}</math>) is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at <math>23^\circ\text{C}</math> in a <math>300\text{ml}</math> beaker) method. A sample of the TSL is placed in a <math>300\text{ml}</math> beaker and the open-ended coax is submerged approximately <math>8\text{mm}</math> below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the FCC OET Bulletin 65 Supplement C targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are <math>&gt; 5\%</math> in range that the DUT is to be tested. If the adjustments fail to bring the parameters to <math>\leq 5\%</math> but are <math>&lt; 10\%</math>, the SAR Fluid Sensitivity as per IEC 62201-1 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters <math>&gt; 10\%</math> in the DUT test frequency range are not used.</p>
<b>Systems Performance Check</b>	<p>The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the <math>10\text{MHz}</math> step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the <math>10\text{MHz}</math> step intervals.</p> <p>A Systems Performance Check (SPC) is performed in accordance with IEEE 1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the <math>1\text{g}</math> and <math>10\text{g}</math> SAR is measured. The measured <math>1\text{g}</math> and <math>10\text{g}</math> SAR is compared to the <math>1\text{g}</math> and <math>10\text{g}</math> SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to <math>1.0\text{W}</math> and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is <math>\leq 10\%</math> of the measured and normalize SAR of the validation source's Calibration Certificate.</p> <p>The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than <math>84</math> hours or if the Active TSL temperature has exceed <math>\pm 1^\circ\text{C}</math> of the initial fluid analysis.</p>

### 13.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	$4 \pm 1 \text{ mm}$
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	$5^\circ \pm 1^\circ$
Area Scan Spatial Resolution $\Delta X, \Delta Y$	$15 \text{ mm}$
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	$7.5 \text{ mm}$
Zoom Scan Spatial Resolution $\Delta Z$ (Uniform Grid)	$5 \text{ mm}$
Zoom Scan Volume X, Y, Z	$30 \text{ mm}$
Phantom	ELI
Fluid Depth	$150 \pm 5 \text{ mm}$
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within $2\text{dB}$ of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the $1\text{-gram}$ and $10\text{-gram}$ peak spatial-average SAR	

### 13.7 Scan Resolution 2GHz to 3GHz

Scan Resolution 2GHz to 3GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	12 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	5 mm
Zoom Scan Spatial Resolution $\Delta Z$ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	150 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

### 13.8 Scan Resolution 5GHz to 6GHz

Scan Resolution 5GHz to 6GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	10 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	4 mm
Zoom Scan Spatial Resolution $\Delta Z$ (Uniform Grid)	2 mm
Zoom Scan Volume X, Y, Z	22 mm
Phantom	ELI
Fluid Depth	100 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

## 14.0 MEASUREMENT UNCERTAINTIES

### Table 14.1 Measurement Variability

Per FCC KDB Publication 865664, SAR measurement variability is not required to be assessed for each frequency band where all measured SAR values are  $<0.8$  W/kg for 1g and  $<2.0$  W/kg for 10g.

### Table 14.2 Measurement Uncertainty

Per FCC KDB 865664 when the highest measured SAR is  $<1.5$  W/kg for 1 g and  $<3.75$  W/kg for 10g all frequency bands, the extensive SAR measurement uncertainty analysis tables described in IEEE std 1528-2013 are not required.

## 15.0 FLUID DIELECTRIC PARAMETERS

Table 15.1 Fluid Dielectric

13 FLUID DIELECTRIC PARAMETERS								Fluid Sensitivity Calculation IEC/IEEE 62209-1528 7.8.2			
Date:	8-Sep-2025	Fluid Temp:	23.9	Frequency:	30MHz	Tissue:	Head	ΔSAR 1g	ΔSAR 10g	SAR Correction Factor (1)	
Freq (MHz)		Test ε	Test σ (S/m)	Target ε	Target σ (S/m)	Deviation Permittivity	Deviation Conductivity			1g	10g
20.0000		50.8600	0.7000	55.0000	0.75	-7.53%	-6.67%	-0.037	-0.037	1.037	1.037
26.9650	*	50.1914	0.7000	55.0000	0.75	-8.74%	-6.67%	-0.034	-0.035	1.034	1.035
27.2050	*	50.1683	0.7000	55.0000	0.75	-8.78%	-6.67%	-0.034	-0.035	1.034	1.035
27.4050	*	50.1491	0.7000	55.0000	0.75	-8.82%	-6.67%	-0.034	-0.035	1.034	1.035
30.0000		49.9000	0.7000	55.0000	0.75	-9.27%	-6.67%	-0.033	-0.034	1.033	1.034

\*Channel Frequency Tested

Fluid dielectric targets above and below 30MHz are not published. Deviation based on 30MHz target using 150 MHz Head TSL.

## 16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.1 System Verification Results 30MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
9/8/2025		30	CLA-30	1005	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	23.9	24	32%	1000	0
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
49.90	55.00	-9.27%	0.70	0.75	-6.67%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
1.28	1.22	4.92%	0.81	0.76	6.46%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
1.28	1.25	2.40%	0.81	0.78	3.86%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEC/IEEE 62209-1528 and FCC KDB 865664,</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

## 17.0 SYSTEM VALIDATION SUMMARY

Table 17.1 System Validation Summary

System Validation Summary										
Frequency	Validation	Probe	Probe	Validation	Source	Tissue	Validation Results			Modulation
(MHz)	Date	Model	S/N	Source	S/N		Sensitivity	Linearity	Isotropy	
30	8-Sep-25	EX3DV4	7826	CLA-30	1005	Head	✓	✓	✓	CW



## 18.0 MEASUREMENT SYSTEM SPECIFICATIONS


Table 18.1 Measurement System Specifications

Measurement System Specification	
<b>Specifications</b>	
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	+/- 0.035 mm
No. of axis	6.0
<b>Data Acquisition Electronic (DAE) System</b>	
<b>Cell Controller</b>	
Processor	Intel(R) Core(TM) i7-7700
Clock Speed	3.60 GHz
Operating System	Windows 10 Professional
<b>Data Converter</b>	
Features	Signal Amplifier, multiplexer, A/D converter, and control logic
Software	Measurement Software: DASY6, V 6.4.0.12171 / DASY52 V10.2(1504)
	Postprocessing Software: SEMCAD X, V14.6.12(7470)
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock
<b>DASY Measurement Server</b>	
Function	Real-time data evaluation for field measurements and surface detection
Hardware	Intel ULV Celeron CPU 400 MHz; 128 MB chip disk; 128 MB RAM
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface
<b>E-Field Probe</b>	
Model	EX3DV4
Serial No.	7826
Construction	Triangular core fiber optic detection system
Frequency	10 MHz to 6 GHz
Linearity	±0.2 dB (30 MHz to 3 GHz)
<b>Phantom</b>	
Type	ELI Elliptical Planar Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	> 30 Liter

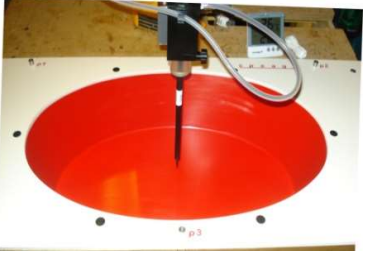
**Table 18.1**

## Measurement System Specification (Continued)


### Probe Specification

Construction:	Symmetrical design with triangular core; Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, glycol)	
Calibration:	In air from 10 MHz to 2.5 GHz In head simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy $\pm 8\%$ )	
Frequency:	10 MHz to > 6 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 3 GHz)	
Directivity:	$\pm 0.2$ dB in head tissue (rotation around probe axis) $\pm 0.4$ dB in head tissue (rotation normal to probe axis)	
Dynamic Range:	5 $\mu$ W/g to > 100 mW/g; Linearity: $\pm 0.2$ dB	
Surface Detect:	$\pm 0.2$ mm repeatability in air and clear liquids over diffuse reflecting surfaces	
Dimensions:	Overall length: 330 mm; Tip length: 16 mm; Body diameter: 12 mm; Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm	
Application:	General dosimetry up to 3 GHz; Compliance tests of mobile phone	<b>EX3DV4 E-Field Probe</b>

### Phantom Specification

The ELI V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEEE 1528-2013, IEC 62209-1 and IEC 62209-2.	
	<b>ELI Phantom</b>

### Device Positioner Specification

The DASY device positioner has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. 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.	
	<b>Device Positioner</b>

## 19.0 TEST EQUIPMENT LIST

**Table 19.1 Equipment List and Calibration**

Test Equipment List				
DESCRIPTION	ASSET NO.	SERIAL NO.	2025	
			DATE CALIBRATED	CALIBRATION DUE
Schmid & Partner DASY 6 System	-	-	-	-
-DASY Measurement Server	00158	1078	CNR	CNR
-Robot	00046	599396-01	CNR	CNR
-DAE4	00019	353	9-May-25	9-May-26
-EX3DV4 E-Field Probe	00357	7826	15-May-25	15-May-26
-CLA 30 Validation Dipole	00300	1005	13-Apr-23	13-Apr-26
ELI Phantom	00247	1234	CNR	CNR
HP 85070C Dielectric Probe Kit	00033	none	CNR	CNR
HP 8753ET Network Analyzer	00134	US39170292	6-Jan-24	6-Jan-27
Rohde & Schwarz SMR20 Signal Generator	00006	100104	COU	COU
Amplifier Research 10W1000C Power Amplifier	00041	27887	CNR	CNR
Amplifier Research 5S1G4 Power Amplifier	00106	26235	CNR	CNR
Narda Directional Coupler 3020A	00064	-	CNR	CNR
Bipolar Power Supply 6299A	00086	1144A02155	CNR	CNR
DC-18G 10W 30db Attenuator	00102	-	COU	COU
R&S FSP40 Spectrum Analyzer	00241	100500	10-Sep-24	10-Sep-27
HP 8566B Spectrum Analyzer	00051	2747A055100	6-Jul-24	6-Jul-27
RF Cable-SMA	00311	-	CNR	CNR
HP Calibration Kit	00145	-	CNR	CNR

CNR = Calibration Not Required  
SB=Stand By  
COU = Calibrate on Use

Note: Per KDB 865664, Dipoles are evaluated annually for return loss and impedance. The dipole's SAR target can only be assessed by the SAR equipment manufacturer and remains the target until the dipole is recalibrated by the manufacturer. The dipole's SAR is evaluated and compared to this target during each and every System Verification which is performed prior to and/or during each DUT SAR evaluation. The results of these verifications are shown in Section 16.0

## 20.0 FLUID COMPOSITION

Table 20.1 Fluid Composition 150MHz HEAD TSL

				150MHz Head
Tissue Simulating Liquid (TSL) Composition				
Component by Percent Weight				
Water	Sugar	Salt <sup>(1)</sup>	HEC <sup>(2)</sup>	Bacteriacide <sup>(3)</sup>
38.35	55.5	5.15	0.9	0.1

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Perservative

Note: 150MHz HEAD TSL formulation was used during this evaluation.

## APPENDIX A – SYSTEM VERIFICATION PLOTS

**DUT: CLA-30 - SN1005; Type: CLA-30; Serial: SN1005**

**Procedure Name: SPC 30H Input=1.0W, 1g Target[1.125][1.25][1.375]W/kg\_ 10g Target [0.682][0.758][0.834] 2**

Communication System: UID 0, CW (0); Frequency: 30 MHz

Medium parameters used:  $f = 30$  MHz;  $\sigma = 0.7$  S/m;  $\epsilon_r = 49.9$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Date/Time: 9/8/2025 3:14:47 PM

DASY5 Configuration:

- Probe: EX3DV4 - SN7826; ConvF(15.72, 14.35, 15.17) @ 30 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = 16.0, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

**SPC/SPC 30H Input=1.0W, 1g Target[1.125][1.25][1.375]W/kg\_ 10g Target [0.682][0.758][0.834] 2/Area Scan (9x9x1):**

Measurement grid:  $dx=15$ mm,  $dy=15$ mm

Maximum value of SAR (measured) = 1.24 W/kg

**SPC/SPC 30H Input=1.0W, 1g Target[1.125][1.25][1.375]W/kg\_ 10g Target [0.682][0.758][0.834] 2/Zoom Scan (6x6x7)/Cube 0:**

Measurement grid:  $dx=7.5$ mm,  $dy=7.5$ mm,  $dz=5$ mm

Reference Value = 41.19 V/m; Power Drift = 0.14 dB

Peak SAR (extrapolated) = 2.08 W/kg

**SAR(1 g) = 1.28 W/kg; SAR(10 g) = 0.807 W/kg**

Smallest distance from peaks to all points 3 dB below = 16.5 mm

Ratio of SAR at M2 to SAR at M1 = 63.4%

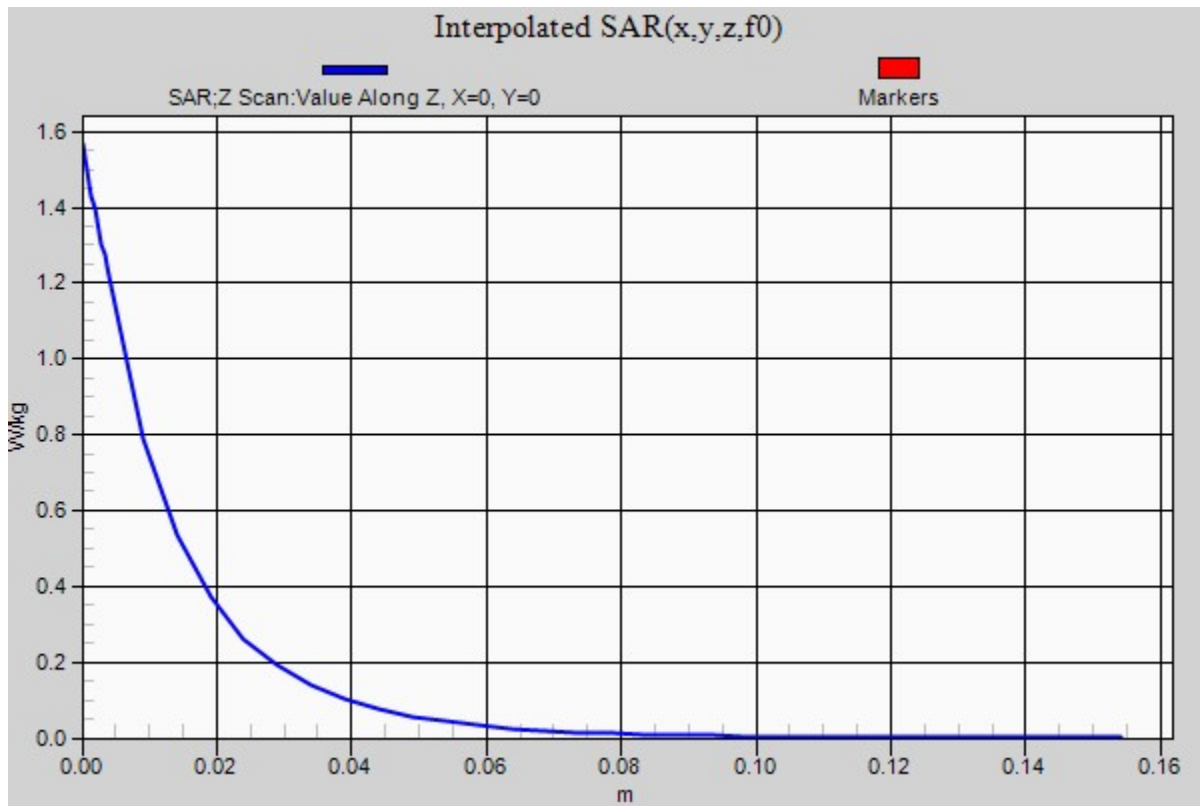
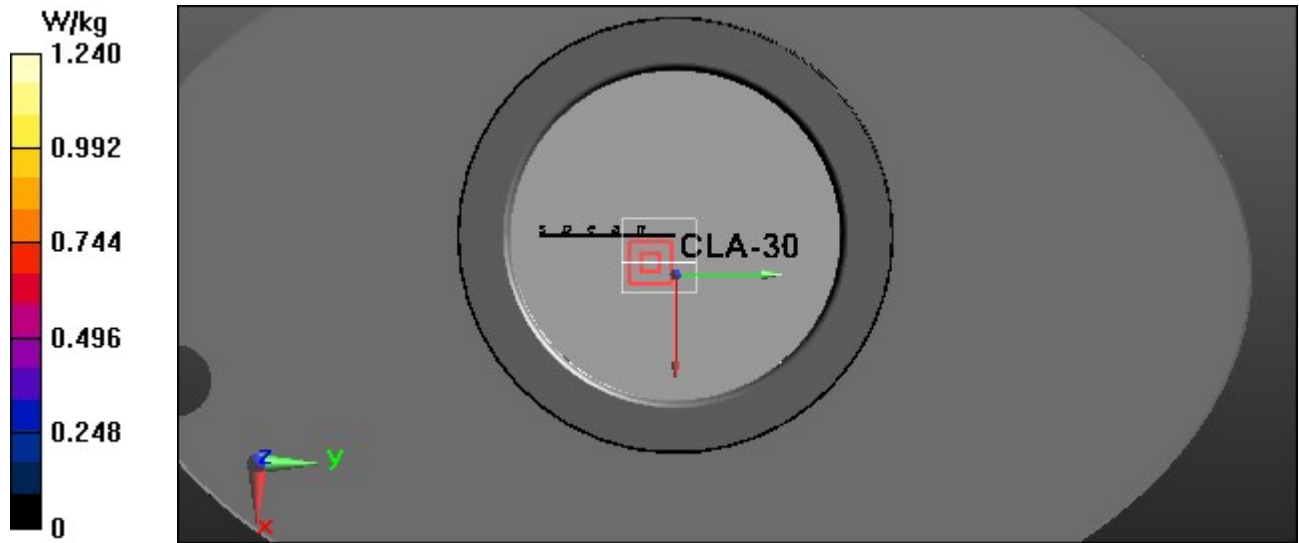
Maximum value of SAR (measured) = 1.39 W/kg

**SPC/SPC 30H Input=1.0W, 1g Target[1.125][1.25][1.375]W/kg\_ 10g Target [0.682][0.758][0.834] 2/Z Scan (1x1x42)**

Measurement grid:  $dx=20$ mm,  $dy=20$ mm,  $dz=5$ mm

Penetration depth = 12.72 (11.66, 13.57) [mm]

Maximum value of SAR (interpolated) = 1.57 W/kg



## APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

### B2

**DUT: President Randy III FCC; Type: PTT; Serial: Not Specified**  
**Procedure Name: B2-President Randy FCC,26.965 MHz Body Config, Flexible Antenna, B1,T1, A1, P1**

Communication System: UID 0, FM (0); Frequency: 26.965 MHz  
Medium parameters used (interpolated):  $f = 26.965$  MHz;  $\sigma = 0.7$  S/m;  $\epsilon_r = 50.191$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section

Date/Time: 9/9/2025 4:12:09 PM

DASY5 Configuration:

- Probe: EX3DV4 - SN7826; ConvF(15.72, 14.35, 15.17) @ 26.965 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

**30H/B2-President Randy FCC,26.965 MHz Body Config, Flexible Antenna, B1, A1,bat P1 2/Area Scan (8x26x1):**  
Measurement grid:  $dx=15$ mm,  $dy=15$ mm

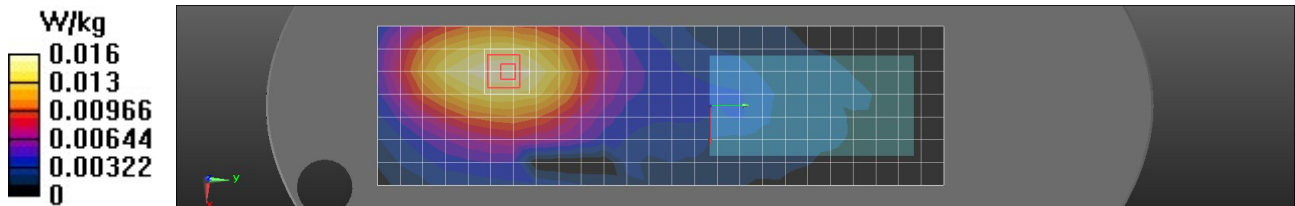
Info: Interpolated medium parameters used for SAR evaluation.  
Maximum value of SAR (measured) = 0.0161 W/kg

**30H/B2-President Randy FCC,26.965 MHz Body Config, Flexible Antenna, B1, A1,bat P1 2/Zoom Scan (5x5x7)/Cube 0:**  
Measurement grid:  $dx=7.5$ mm,  $dy=7.5$ mm,  $dz=5$ mm  
Reference Value = 2.134 V/m; Power Drift = -0.06 dB  
Peak SAR (extrapolated) = 0.0220 W/kg  
**SAR(1 g) = 0.015 W/kg; SAR(10 g) = 0.011 W/kg**  
Ratio of SAR at M2 to SAR at M1 = 73.4%

Info: Interpolated medium parameters used for SAR evaluation.  
Maximum value of SAR (measured) = 0.0162 W/kg

**30H/B2-President Randy FCC,26.965 MHz Body Config, Flexible Antenna, B1, A1,bat P1 2/Z Scan (1x1x42):**  
Measurement grid:  $dx=20$ mm,  $dy=20$ mm,  $dz=5$ mm

Info: Interpolated medium parameters used for SAR evaluation.  
Penetration depth = 36.70 (25.25, 19.06) [mm]  
Maximum value of SAR (interpolated) = 0.0138 W/kg



## F1

Date/Time: 9/9/2025 10:21:45 AM

**DUT: President Randy III FCC; Type: PTT; Serial: Not Specified**

**Procedure Name: F1-President Randy FCC,27.405 MHz Face Config[25mm], Flexible Antenna, B1, T1, P1**

Communication System: UID 0, FM(0); Frequency: 27.405 MHz

Medium parameters used (interpolated):  $f = 27.405$  MHz;  $\sigma = 0.7$  S/m;  $\epsilon_r = 50.149$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Date/Time: 9/9/2025 10:21:45 AM

DASY5 Configuration:

- Probe: EX3DV4 - SN7826; ConvF(15.72, 14.35, 15.17) @ 27.405 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection),  $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

**30H/F1-President Randy FCC,27.405 MHz Face Config[25mm], Flexible Antenna, bat P1,/Area Scan (8x26x1):**

Measurement grid:  $dx=15$ mm,  $dy=15$ mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 0.0338 W/kg

**30H/F1-President Randy FCC,27.405 MHz Face Config[25mm], Flexible Antenna, bat P1,/Zoom Scan (5x5x7)/Cube 0:**

Measurement grid:  $dx=7.5$ mm,  $dy=7.5$ mm,  $dz=5$ mm

Reference Value = 8.881 V/m; Power Drift = 1.81 dB

Peak SAR (extrapolated) = 0.277 W/kg

**SAR(1 g) = 0.162 W/kg; SAR(10 g) = 0.084 W/kg**

Smallest distance from peaks to all points 3 dB below = 3.4 mm

Ratio of SAR at M2 to SAR at M1 = 75.4%

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 0.258 W/kg

**30H/F1-President Randy FCC,27.405 MHz Face Config[25mm], Flexible Antenna, bat P1,/Z Scan (1x1x42):**

Measurement grid:  $dx=20$ mm,  $dy=20$ mm,  $dz=5$ mm

Info: Interpolated medium parameters used for SAR evaluation.

Penetration depth = 25.91 (22.77, 27.67) [mm]

Maximum value of SAR (interpolated) = 0.0930 W/kg

