TEST REPORT

Applicant:	Xiaomi Communications Co., Ltd.
Address:	#019, 9th Floor, Building 6, 33 Xi'erqi Middle Road, Haidian District, Beijing, China, 100085
Equipment Type:	Wireless Earphones
Model Name:	M2535E1
Brand Name:	REDMI
FCC ID:	2AFZZM2535E1
Test Standard:	FCC 47 CFR Part 2.1093 (refer to section 3.1)
Maximum SAR:	Head (1 g@0mm): 1.04 W/kg
Sample Arrival Date:	Jul .24, 2025
Test Date:	Jul .30, 2025 - Aug. 27, 2025
Date of Issue:	Sep. 01, 2025

ISSUED BY:

Shenzhen BALUN Technology Co., Ltd.

Tested by: Zhang Jiwei

Zhang Jiwei

Checked by: Xu Rui

Xu Rui

Approved by: Tolan Tu (Testing Director)

Tolan Tu

Revision History

Version	Issue Date	Revisions Content
Rev. 01	Aug. 20, 2025	Initial Issue
Rev. 02	Sep. 01, 2025	Increase BLE testing and update relevant data; Update ANNEX C EUT EXTERNAL PHOTOS and ANNEX D EUT INTERNAL PHOTOS

TABLE OF CONTENTS

1 GENERAL INFORMATION

1.1 Test Laboratory

Name	Shenzhen BALUN Technology Co., Ltd.
Address	Block B, 1/F, Baisha Science and Technology Park, Shahe Xi Road, Nanshan District, Shenzhen, Guangdong Province, P. R. China
Phone Number	+86 755 6685 0100

1.2 Test Location

Name	Shenzhen BALUN Technology Co., Ltd.
Location	☐ Block B, 1/F, Baisha Science and Technology Park, Shahe Xi Road, Nanshan District, Shenzhen, Guangdong Province, P. R. China
	☑ 1/F, Building B, Ganghongji High-tech Intelligent Industrial Park, No. 1008, Songbai Road, Yangguang Community, Xili Sub-district, Nanshan District, Shenzhen, Guangdong Province, P. R. China
Accreditation Certificate	The laboratory is a testing organization accredited by FCC as a accredited testing laboratory. The designation number is CN1196.

1.3 Test Environment Condition

Ambient Temperature	18℃ to 25℃
Ambient Relative Humidity	30% to 70%

2 PRODUCT INFORMATION

2.1 Applicant Information

Applicant	Xiaomi Communications Co., Ltd.
Address	#019, 9th Floor, Building 6, 33 Xi'erqi Middle Road, Haidian District, Beijing, China, 100085

2.2 Manufacturer Information

Manufacturer	Xiaomi Communications Co., Ltd.
Address	#019, 9th Floor, Building 6, 33 Xi'erqi Middle Road, Haidian District, Beijing, China, 100085

2.3 General Description for Equipment under Test (EUT)

EUT Name	Wireless Earphones
Model Name Under Test	M2535E1
Series Model Name	N/A
Description of Model name differentiation	N/A
Hardware Version	Earphone: V2.2; Charging case: V1.4
Software Version	V1.1.7.4
Dimensions (Approx.)	N/A
Weight (Approx.)	N/A

2.4 Ancillary Equipment

Please refer the document “BL-SZ2571376-AW.PDF”.

2.5 Technical Information

Network and Wireless connectivity	Bluetooth (BR+EDR+BLE)

The requirement for the following technical information of the EUT was tested in this report:

Operating Mode	Bluetooth	
Frequency Range	Bluetooth	2402 ~ 2480 MHz
Antenna Type	Bluetooth: FPC Antenna	
DTM	N/A	
Hotspot Function	Support	
Exposure Category	General Population/Uncontrolled exposure	
Product Type	Portable Device	
EUT Type	☒ Production unit	☐ Identical prototype

3 SUMMARY OF TEST RESULT

3.1 Test Standards

No.	Identity	Document Title
1	47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices
2	ANSI/IEEE C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
3	IEEE Std. 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate(SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
4	KDB 447498 D04 v01	447498 D04 Interim General RF Exposure Guidance v01
5	KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
6	KDB 865664 D02 v01r02	RF Exposure Reporting

3.2 Device Category and SAR Limit

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user.

Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

Table of Exposure Limits:

Body Position	SAR Value (W/Kg)	
	General Population/ Uncontrolled Exposure	Occupational/ Controlled Exposure
Whole-Body SAR (averaged over the entire body)	0.08	0.4
Partial-Body SAR (averaged over any 1 gram of tissue)	1.60	8.0
SAR for hands, wrists, feet and ankles (averaged over any 10 grams of tissue)	4.0	20.0

NOTE:

General Population/Uncontrolled Exposure: Locations where there is the exposure of individuals who have no knowledge or control of their exposure. General population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Occupational/Controlled Exposure: Locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

3.3 Test Result Summary

<table>
<tr><th rowspan="2">Frequency Band</th><th>Left earphone</th><th>Right earphone</th></tr>
<tr><th colspan="2">Head 1g（W/Kg）
(Separation 0mm)</th></tr>
<tr><td>Bluetooth</td><td>1.04</td><td>1.04</td></tr>
<tr><td>Maximum Report SAR</td><td colspan="2">1.04</td></tr>
<tr><td>Limits (W/kg)</td><td colspan="2">1.6</td></tr>
<tr><td>Verdict</td><td colspan="2">PASS</td></tr>
<tr><td colspan="3">Note: The highest Reported Head 1g SAR value is 1.04 W/kg.</td></tr>
</table>

3.4 Test Uncertainty

According to KDB 865664 D01, When the highest measured 1 g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis is not required in SAR reports submitted for equipment approval.

The maximum 1 g SAR for the EUT in this report is 1.04 W/kg, which is lower than 1.5 W/kg, so the extensive SAR measurement uncertainty analysis is not required in this report.

4 MEASUREMENT SYSTEM

4.1 Specific Absorption Rate (SAR) Definition

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

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

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

SAR is expressed in units of Watts per kilogram (W/kg) SAR measurement can be related to the electrical field in the tissue by

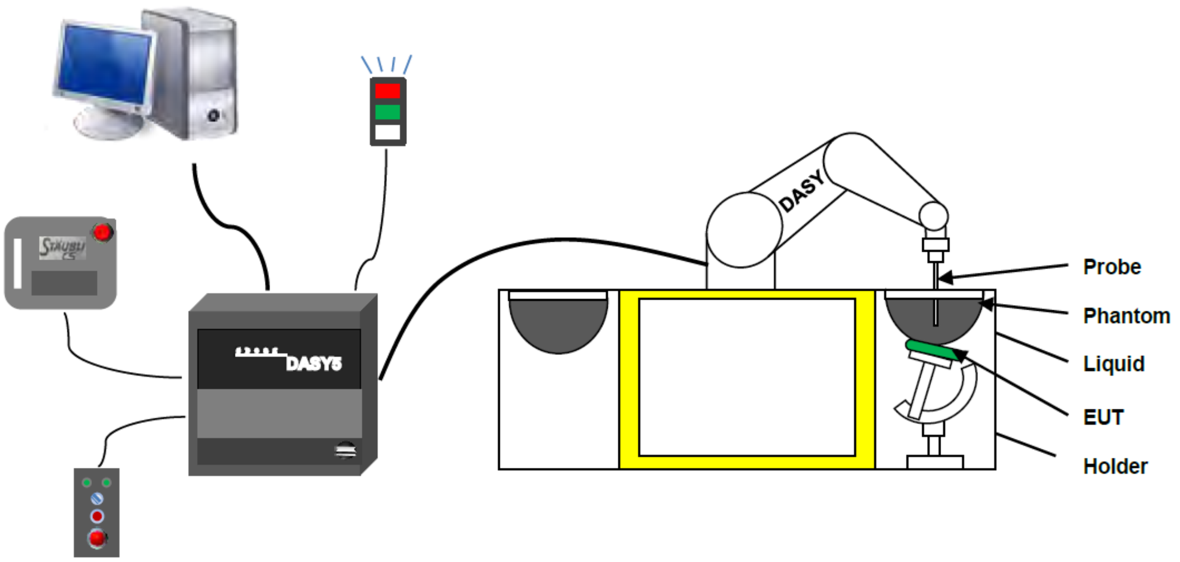
$$\mathbf{SAR} = \frac{\sigma \mathbf{E}^2}{\rho}$$

Where: σ is the conductivity of the tissue,

ρ is the mass density of the tissue and E is the RMS electrical field strength.

4.2 DASY SAR System

4.2.1 DASY SAR System Diagram



The DASY5 system for performing compliance tests consists of the following items:

1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).
2. A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
3. A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
4. A unit to operate the optical surface detector which is connected to the EOC.
5. The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.
6. The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation.
7. DASY5 software and SEMCAD data evaluation software.
8. Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
9. The generic twin phantom enabling the testing of left-hand and right-hand usage.
10. The device holder for handheld mobile phones.
11. Tissue simulating liquid mixed according to the given recipes.
12. System validation dipoles allowing to validate the proper functioning of the system.

4.2.2 Robot

The Dasy SAR system uses the high precision robots. Symmetrical design with triangular core Built-in optical fiber for surface detection system For the 6-axis controller system, Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents). The robot series have many features that are important for our application:

- High precision
  (repeatability ±0.02 mm)
- High reliability
  (industrial design)
- Low maintenance costs
  (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements
  (brush less synchron motors; no stepper motors)
- Low ELF interference
  (motor control _elds shielded via the closed metallic construction shields)

4.2.3 E-Field Probe

The probe is specially designed and calibrated for use in liquids with high permittivities for the measurements the Specific Dosimetric E-Field Probe EX3DV4 with following specifications is used.

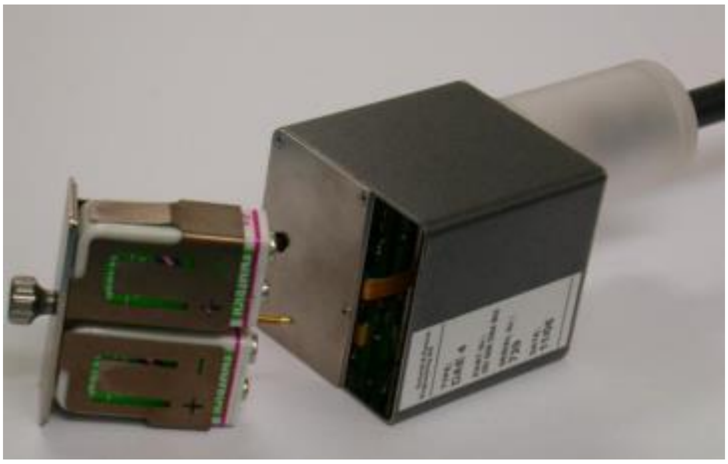
Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection systemBuilt-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., glycolether)
Calibration	ISO/IEC 17025 calibration service available
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.2 dB in HSL (rotation around probe axis) ; ± 0.4 dB in HSL (rotation normal to probe axis)
Dynamic range	5 μW/g to > 100 mW/g; Linearity: ± 0.2 dB
Dimensions	Overall length: 337 mm (Tip: 9 mm) Tip diameter: 2.5 mm (Body: 10 mm) Distance from probe tip to dipole centers: 1.0 mm
Application	General dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms (EX3DV4)

E-Field Probe Calibration Process

Probe calibration is realized, in compliance with CENELEC EN 62209-1/-2 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 62209-1/2 annexe technique using reference guide at the five frequencies.

4.2.4 Data Acquisition Electronics

The data acquisition electronics (DAE) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converte and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.



- Input Impedance: 200MOhm
- The Inputs: Symmetrical and Floating
- Commom Mode Rejection: Above 80dB

4.2.5 Phantoms

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

- Left head
- Right head
- Flat phantom

Photo of Phantom

Serial Number	Material	Length	Height
SAM	Vinylester, glass fiber reinforced	1000	500

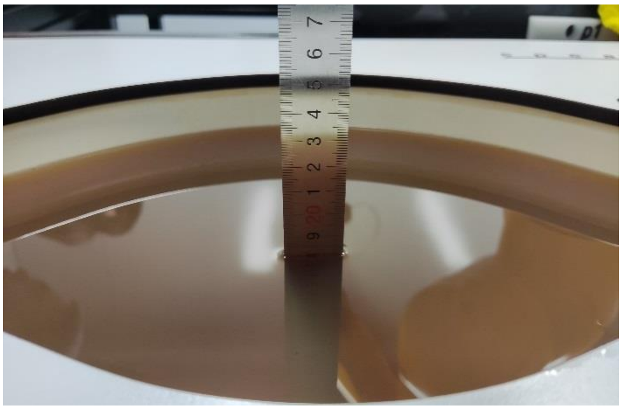
4.2.6 Device Holder

The DASY5 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. 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. This device holder is used for standard mobile phones or PDA‟s only. If necessary an additional support of polystyrene material is used. Larger DUT‟s (e.g. notebooks) cannot be tested using this device holder. Instead a support of bigger polystyrene cubes and thin polystyrene plates is used to position the DUT in all relevant positions to find and measure spots with maximum SAR values. Therefore those devices are normally only tested at the flat part of the SAM.

The positioning system allows obtaining cheek and tilting position with a very good accuracy. Incompliance with CENELEC, the tilt angle uncertainty is lower than 1°.

4.2.7 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 15 cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5%.

Head Liquid Depth	**Body Liquid Depth**
	

The following table gives the recipes for tissue simulating liquid.

TSL	Manufacturer / Model	Freq Range (MHz)	Main Ingredients
Head WideBand	SPEAG HBBL600-10000V6	600-10000	Ethanediol, Sodium petroleum sulfonate, Hexylene Glycol / 2-Methyl-pentane-2.4-diol, Alkoxylated alcohol

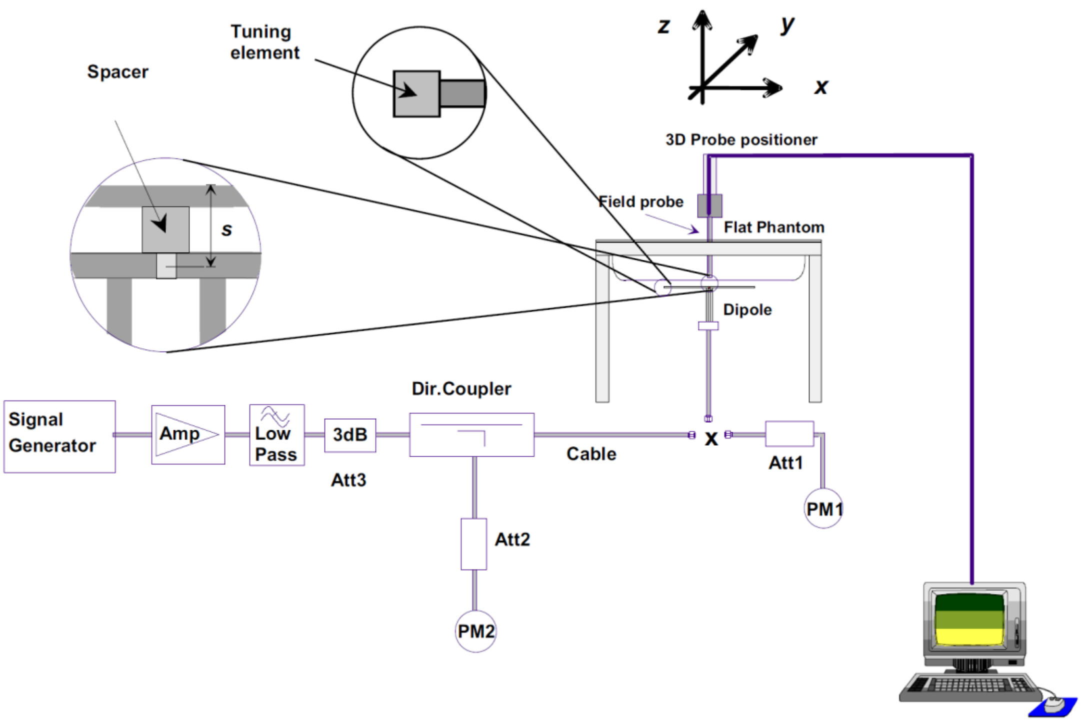
5 SYSTEM VERIFICATION

5.1 Purpose of System Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source.This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

5.2 System Check Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

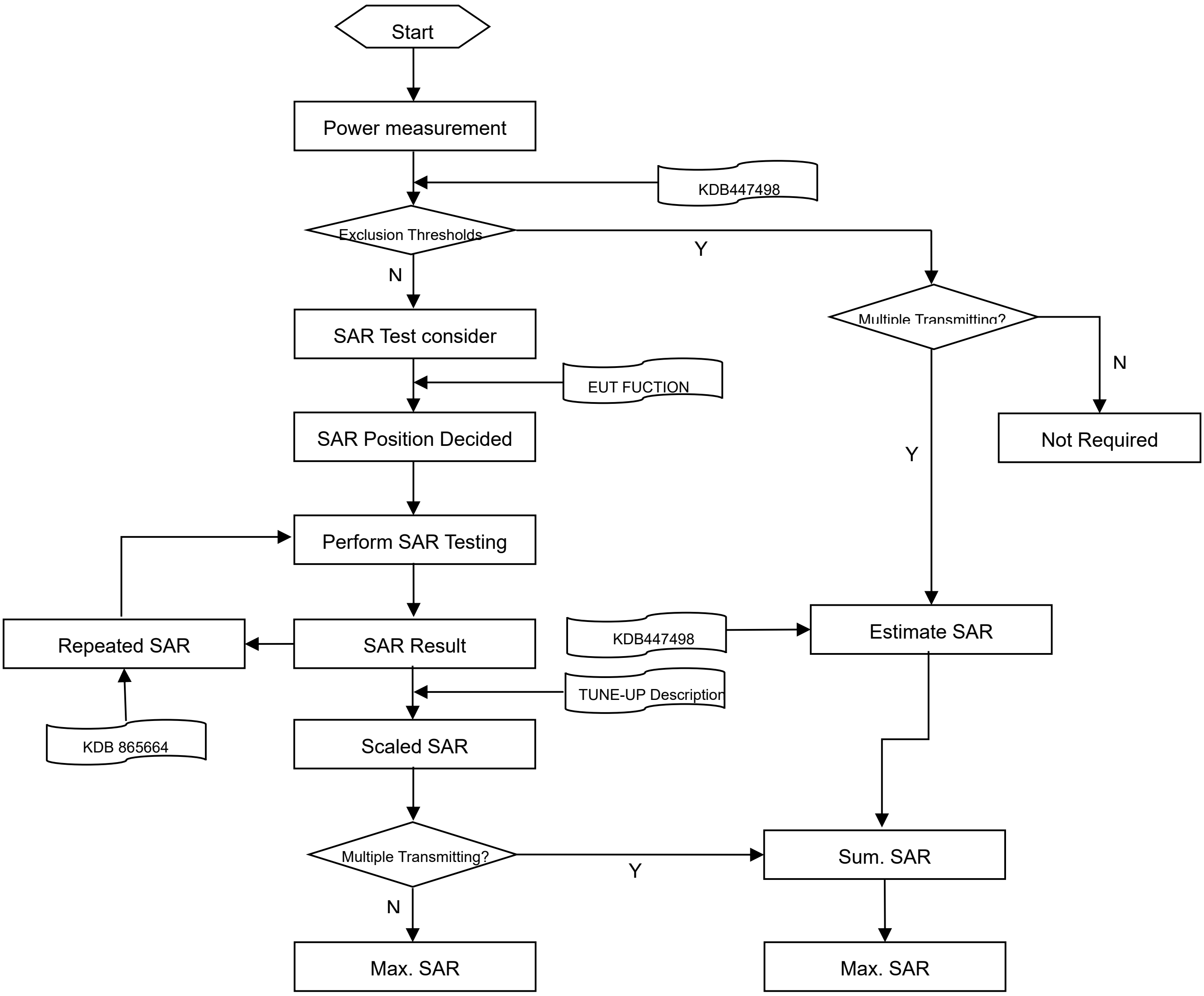


6 TEST POSITION CONFIGURATIONS

Devices that are designed to transmit next to the ear, and operate according to the handset procedures in KDB Pub. 648474, must be tested using the SAM phantom defined in IEEE and IEC SAR measurement standards.
Other head exposure conditions, for example, in-front-of the face, shall be tested using a flat phantom according to the applicable KDB publication (e.g., 643646). Unless specifically authorized through a KDB inquiry, the SAM (head) phantom is generally unacceptable for testing the SAR of other head and body exposure conditions.

7 MEASUREMENT PROCEDURE

7.1 Measurement Process Diagram



7.2 SAR Scan General Requirement

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Boththe probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1 g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std 1528-2013.

<table>
<tr><th colspan="3"></th><th>≤3GHz</th><th>>3GHz</th></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5±1 mm</td><td>½·δ·ln(2)±0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30°±1°</td><td>20°±1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx Area , Δy Area</td><td>≤ 2 GHz: ≤ 15 mm
2 – 3 GHz: ≤ 12 mm</td><td>3–4 GHz: ≤ 12 mm
4 – 6 GHz: ≤ 10 mm</td></tr>
<tr><td colspan="2">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 ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: Δx Zoom , Δy Zoom</td><td>≤ 2 GHz: ≤ 8 mm
2 –3 GHz: ≤ 5 mm*</td><td>3–4 GHz: ≤ 5 mm*
4 – 6 GHz: ≤ 4 mm*</td></tr>
<tr><td rowspan="7">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2" rowspan="3">uniform grid: Δz Zoom (n)</td><td rowspan="3">≤ 5 mm</td><td>3–4 GHz: ≤ 4 mm</td></tr>
<tr><td>4–5 GHz: ≤ 3 mm</td></tr>
<tr><td>5–6 GHz: ≤ 2 mm</td></tr>
<tr><td rowspan="4">graded grid</td><td rowspan="3">Δz Zoom (1): between 1st two points closest to phantom surface</td><td rowspan="3">≤ 4 mm</td><td>3–4 GHz: ≤ 3 mm</td></tr>
<tr><td>4–5 GHz: ≤ 2.5 mm</td></tr>
<tr><td>5–6 GHz: ≤ 2 mm</td></tr>
<tr><td>Δz Zoom (n>1): between subsequent points</td><td colspan="2">≤ 1.5·Δz Zoom (n-1)</td></tr>
<tr><td rowspan="3">Minimum zoom scan volume</td><td colspan="2" rowspan="3">x, y, z</td><td rowspan="3">≥30 mm</td><td>3–4 GHz: ≥ 28 mm</td></tr>
<tr><td>4–5 GHz: ≥ 25 mm</td></tr>
<tr><td>5–6 GHz: ≥ 22 mm</td></tr>
<tr><td colspan="5">Note:
1. δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.
2. * When zoom scan is required and the reported SAR from the area scan based 1 g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.</td></tr>
</table>

7.3 Measurement Procedure

The following steps are used for each test position

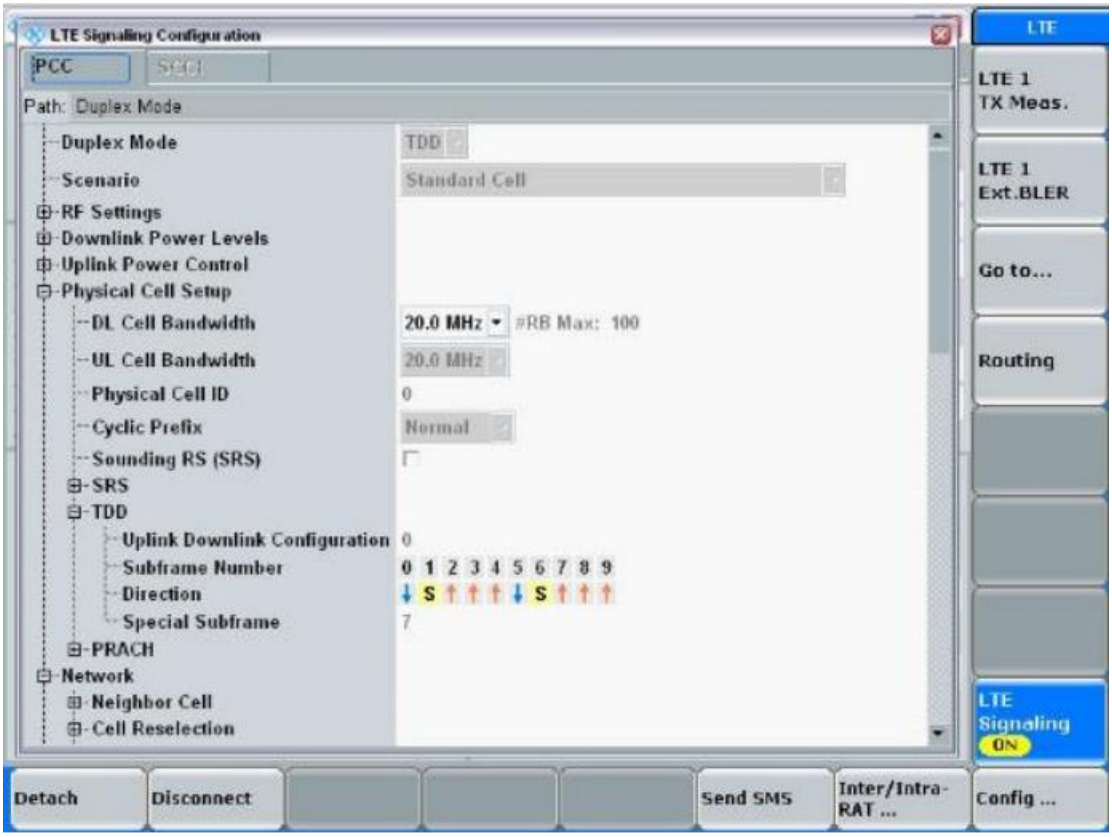
a. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface
b. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
c. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
d. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 *32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

7.4 Area & Zoom Scan Procedure

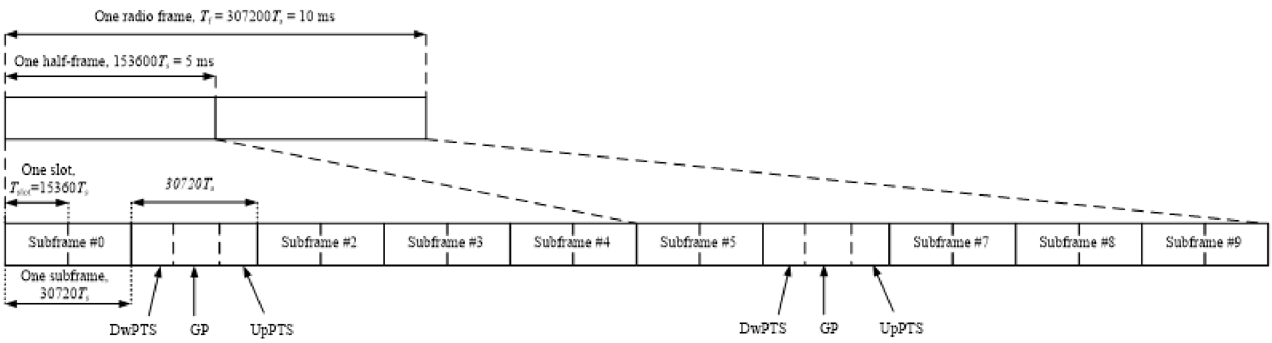
First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r04 quoted below.
When the 1 g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.

7.5 LTE (TDD) Considerations

During TDD-LTE SAR testing, the EUT was commanded to transmit on maximum output power and maximum transmitting bandwidth. The uplink and downlink slot configuration as below in one radio frame.



According to 3GPP Per 3GPP TS 36.211. Each radio frame of length (Tf=307200*TS =10ms) of two half-frames of length (153600*TS =5ms). Each half-frame consists of five sub-frames of length (30720*TS =1ms)



And the special sub-frame with the three fields DwPTS, GP and UpPTS.

The length of DwPTS and UpPTS is given by below table subject to the total length of DwPTS, GP and UpPTS being equal to 30720*T_S =1ms.

Configuration of special sub-frame (lengths of DwPTS/GP/UpPTS)

<table>
<tr><th rowspan="3">Special sub-frame configuration</th><th colspan="3">Normal cyclic prefix in downlink</th><th colspan="3">Extended cyclic prefix in downlink</th></tr>
<tr><th rowspan="2">DwPTS</th><th colspan="2">UpPTS</th><th rowspan="2">DwPTS</th><th colspan="2">UpPTS</th></tr>
<tr><th>Normal cyclic prefix in uplink</th><th>Extended cyclic prefix in uplink</th><th>Normal cyclic prefix in uplink</th><th>Extended cyclic prefix in uplink</th></tr>
<tr><td>0</td><td>6592·T_s</td><td rowspan="5">2192·T_s</td><td rowspan="5">2560·T_s</td><td>7680·T_s</td><td rowspan="4">2192·T_s</td><td rowspan="4">2560·T_s</td></tr>
<tr><td>1</td><td>19760·T_s</td><td>20480·T_s</td></tr>
<tr><td>2</td><td>21592·T_s</td><td>23040·T_s</td></tr>
<tr><td>3</td><td>24144·T_s</td><td>25600·T_s</td></tr>
<tr><td>4</td><td>26336·T_s</td><td>7680·T_s</td><td rowspan="4">2560·T_s</td><td rowspan="4">5120·T_s</td></tr>
<tr><td>5</td><td>6592·T_s</td><td rowspan="5">4384·T_s</td><td rowspan="5">5120·T_s</td><td>20480·T_s</td></tr>
<tr><td>6</td><td>19760·T_s</td><td>23040·T_s</td></tr>
<tr><td>7</td><td>21592·T_s</td><td>12800·T_s</td></tr>
<tr><td>8</td><td>24144·T_s</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>9</td><td>13168·T_s</td><td>-</td><td>-</td><td>-</td></tr>
</table>

For special sub-frame uplink time we used the largest cyclic prefix for duty cycle calculate;

Maximum uplink time of one special sub-frame=(largest cyclic prefix)/(one sub-frame of length)* time of one sub-frame=5120.Ts/30720.Ts*1ms=0.167ms

One radio frame with 6 uplink sub-frames and two special sub-frame,
there for the maximum Uplink time in one radio frame is: **6*1 ms+2*0.167 ms=6.334ms**
So, the duty cycle for TDD-LTE is: **6.334ms/10ms =1: 1.58**

8 CONDUCTED RF OUPUT POWER

8.1 Bluetooth

8.1.1 Left Ear Power

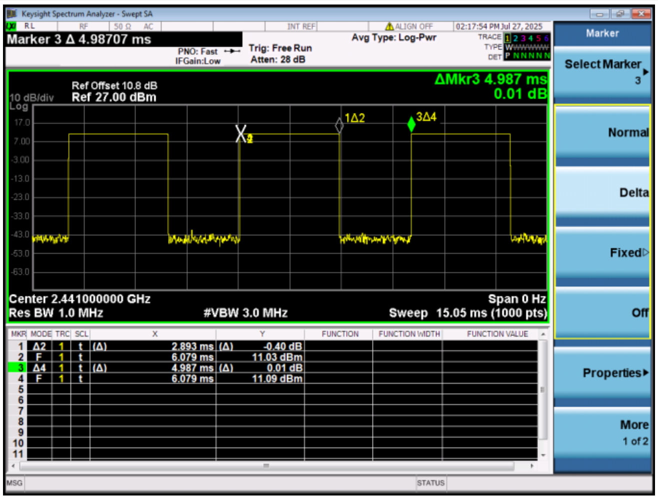
Mode	GFSK			π/4-DQPSK		
Channel	0	39	78	0	39	78
Frequency (MHz)	2402	2441	2480	2402	2441	2480
Conducted Power (dBm)	10.97	11.27	**11.46**	10.97	11.32	11.49
Tune-Up Limit (dBm)	12.50	12.50	12.50	12.50	12.50	12.50
SAR Test Require	Yes	Yes	Yes	No	No	No
Mode	8-DPSK			/		
Channel	0	39	78	/	/	/
Frequency (MHz)	2402	2441	2480	/	/	/
Conducted Power (dBm)	10.94	11.28	11.56	/	/	/
Tune-Up Limit (dBm)	12.50	12.50	12.50	/	/	/
SAR Test Require	No	No	No	/	/	/
Mode	BLE-1Mbps			BLE-2Mbps		
Channel	0	19	39	1	19	38
Frequency (MHz)	2402	2440	2480	2404	2440	2478
Conducted Power (dBm)	9.93	10.30	**10.54**	10.19	10.57	10.81
Tune-Up Limit (dBm)	11.50	11.50	11.50	11.50	11.50	11.50
SAR Test Require	Yes	Yes	Yes	No	No	No

Note 1: Since bluetooth BR mode is the maximum output power mode, SAR measurements were performed with test software using DH5 modulation, and SAR measurement is not required for the EDR and LE. When the secondary mode is ≤ ¼ dB higher than the primary mode.

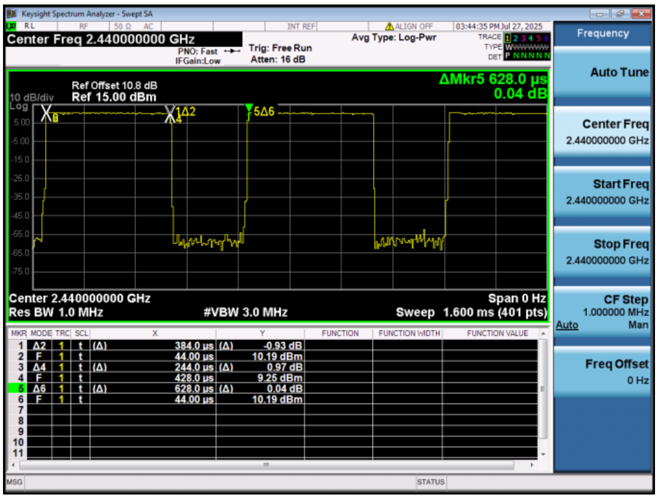
Note: The Bluetooth GFSK Mode duty cycle is 58.01% and BLE-1Mbps Mode duty cycle is 61.15% as following figure, according to 2016 Oct. TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation.

Duty Cycle

GFSK



BLE-1Mbps



8.1.2 Right Ear Power

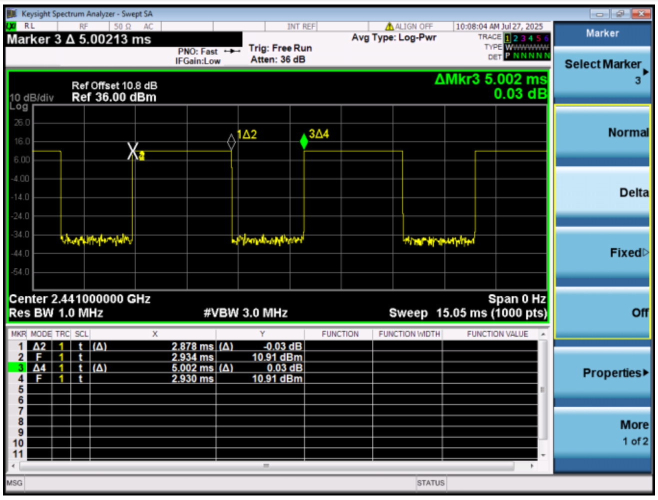
Mode	GFSK			π/4-DQPSK		
Channel	0	39	78	0	39	78
Frequency (MHz)	2402	2441	2480	2402	2441	2480
Conducted Power (dBm)	10.77	11.07	**11.20**	10.88	11.15	11.27
Tune-Up Limit (dBm)	12.50	12.50	12.50	12.50	12.50	12.50
SAR Test Require	Yes	Yes	Yes	No	No	No
Mode	8-DPSK			/		
Channel	0	39	78	/	/	/
Frequency (MHz)	2402	2441	2480	/	/	/
Conducted Power (dBm)	10.82	11.14	11.28	/	/	/
Tune-Up Limit (dBm)	12.50	12.50	12.50	/	/	/
SAR Test Require	No	No	No	/	/	/
Mode	BLE-1Mbps			BLE-2Mbps		
Channel	0	19	39	1	19	38
Frequency (MHz)	2402	2440	2480	2404	2440	2478
Conducted Power (dBm)	9.71	10.05	**10.27**	9.98	10.30	10.52
Tune-Up Limit (dBm)	11.50	11.50	11.50	11.50	11.50	11.50
SAR Test Require	Yes	Yes	Yes	No	No	No

Note 1: Since bluetooth BR mode is the maximum output power mode, SAR measurements were performed with test software using DH5 modulation, and SAR measurement is not required for the EDR and LE. When the secondary mode is ≤ ¼ dB higher than the primary mode.

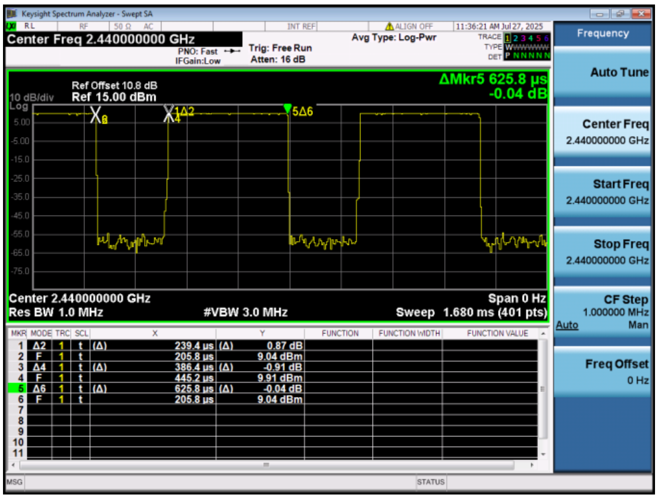
Note: The Bluetooth GFSK Mode duty cycle is 57.54% and BLE-1Mbps Mode duty cycle is 61.74% as following figure, according to 2016 Oct. TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation.

Duty Cycle

GFSK



BLE-1Mbps



9 TEST RESULT

9.1 Bluetooth

Mode	Position	Dist. (mm)	Ch.	Freq. (MHz)	Power Drift (dB)	1 g Meas SAR (W/kg)	Meas. Power (dBm)	Max. tune-up power (dBm)	Scaling Factor	Duty cycle （%）	Duty cycle Factor	1g Scaled SAR (W/kg)	Meas. No.
Left Headset													
DH5	Front Side	0	78	2480	0.11	0.016	11.46	12.50	1.271	58.01	1.724	0.035	/
	Back Side	0	78	2480	0.07	0.475	11.46	12.50	1.271	58.01	1.724	**1.041**	1#
	Left Side	0	78	2480	-0.12	0.186	11.46	12.50	1.271	58.01	1.724	0.408	/
	Right Side	0	78	2480	-0.04	0.265	11.46	12.50	1.271	58.01	1.724	0.581	/
	Top Side	0	78	2480	-0.02	0.006	11.46	12.50	1.271	58.01	1.724	0.013	/
	Bottom Side	0	78	2480	-0.14	0.008	11.46	12.50	1.271	58.01	1.724	0.018	/
	Back Side	0	0	2402	0.14	0.379	10.97	12.50	1.422	58.01	1.724	0.929	/
	Back Side	0	39	2441	0.02	0.451	11.27	12.50	1.327	58.01	1.724	1.032	/
BLE-1Mbps	Front Side	0	39	2480	0.14	0.012	10.54	11.50	1.247	61.15	1.635	0.024	/
	Back Side	0	39	2480	0.08	0.393	10.54	11.50	1.247	61.15	1.635	0.801	/
	Left Side	0	39	2480	0.11	0.145	10.54	11.50	1.247	61.15	1.635	0.296	/
	Right Side	0	39	2480	0.07	0.208	10.54	11.50	1.247	61.15	1.635	0.424	/
	Top Side	0	39	2480	0.05	0.006	10.54	11.50	1.247	61.15	1.635	0.012	/
	Bottom Side	0	39	2480	0.09	0.005	10.54	11.50	1.247	61.15	1.635	0.010	/
	Back Side	0	0	2402	0.05	0.294	9.93	11.50	1.435	61.15	1.635	0.690	/
	Back Side	0	19	2440	-0.13	0.341	10.30	11.50	1.318	61.15	1.635	0.735	/
Right Headset													
DH5	Front Side	0	78	2480	-0.12	0.015	11.20	12.50	1.349	57.54	1.738	0.035	/
	Back Side	0	78	2480	0.02	0.443	11.20	12.50	1.349	57.54	1.738	**1.039**	2#
	Left Side	0	78	2480	0.09	0.248	11.20	12.50	1.349	57.54	1.738	0.581	/
	Right Side	0	78	2480	0.05	0.219	11.20	12.50	1.349	57.54	1.738	0.513	/
	Top Side	0	78	2480	-0.01	0.006	11.20	12.50	1.349	57.54	1.738	0.014	/
	Bottom Side	0	78	2480	0.06	0.018	11.20	12.50	1.349	57.54	1.738	0.042	/
	Back Side	0	0	2402	0.12	0.336	10.77	12.50	1.489	57.54	1.738	0.870	/
	Back Side	0	39	2441	-0.10	0.419	11.07	12.50	1.390	57.54	1.738	1.012	/
BLE-1Mbps	Front Side	0	39	2480	0.05	0.010	10.27	11.50	1.327	61.74	1.620	0.021	/
	Back Side	0	39	2480	-0.06	0.345	10.27	11.50	1.327	61.74	1.620	0.742	/
	Left Side	0	39	2480	-0.05	0.186	10.27	11.50	1.327	61.74	1.620	0.400	/
	Right Side	0	39	2480	-0.07	0.173	10.27	11.50	1.327	61.74	1.620	0.372	/
	Top Side	0	39	2480	0.05	0.006	10.27	11.50	1.327	61.74	1.620	0.013	/

	Bottom Side	0	39	2480	0.05	0.012	10.27	11.50	1.327	61.74	1.620	0.026	/
	Back Side	0	0	2402	-0.06	0.274	9.71	11.50	1.510	61.74	1.620	0.670	/
	Back Side	0	19	2440	0.06	0.318	10.05	11.50	1.396	61.74	1.620	0.719	/
Note: Refer to ANNEX C for the detailed test data for each test configuration.													

10 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10, the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR repeated measurement procedure:

1. When the highest measured SAR is < 0.80 W/kg, repeated measurement is not required.
2. When the highest measured SAR is >= 0.80 W/kg, repeat that measurement once.
3. 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, perform a second repeated measurement.
4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20, and the original, first or second repeated measurement is >= 1.5 W/kg, perform a third repeated measurement.

   Note: For 1g SAR, the highest measured 1g SAR is 0.475 < 0.80 W/kg, repeated measurement is not required.

12 TEST EQUIPMENTS LIST

Description	Manufacturer	Model	Serial No./Version	Cal. Date	Cal. Due
PC	Dell	N/A	N/A	N/A	N/A
Test Software	Speag	DASY5	52.8.8.1222	N/A	N/A
2450MHz Validation Dipole	Speag	D2450V2	SN: 952	2024/05/07	2027/05/06
Data Acquisition Electronics	Speag	DAE4	SN: 1423	2025/06/05	2026/06/04
Data Acquisition Electronics	Speag	DAE4	SN: 878	2025/03/05	2026/03/04
E-Field Probe	Speag	EX3DV4	SN: 3974	2025/06/05	2026/06/04
E-Field Probe	Speag	EX3DV4	SN: 7893	2024/09/05	2025/09/04
Signal Generator	Keysight	N5173B	MY62150163	2024/08/12	2025/08/11
Power Meter	R&S	NRVD-B2	835843/014	2024/08/08	2025/08/07
Power Sensor	R&S	NRV-Z4	100381	2024/08/08	2025/08/07
Power Sensor	R&S	NRV-Z2	100211	2024/08/08	2025/08/07
Network Analyzer	Agilent	E5071C	MY46103472	2024/09/11	2025/09/10
Thermometer	Elitech	RC-4HC	EF7216002985	2024/10/31	2025/10/30
Thermometer	Elitech	RC-4HC	EF720B004811	2024/10/31	2025/10/30
Power Amplifier	Mini-Circuits	ZVA-183W-S+	932502132	N/A	N/A
Dielectric Probe Kit	Speag	DAK3.5	SN: 1312	N/A	N/A
Phantom	Speag	SAM	SN: 1576	N/A	N/A
Attenuator	COM-MW	ZA-S1-31	1305003187	N/A	N/A
Directional coupler	AA-MCS	AAMCS-UDC	000272	N/A	N/A

Note: For dipole antennas, BALUN has adopted 3 years as calibration intervals, and 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 in within 20% of calibrated measurement.
4. Impedance (real or imaginary parts) in within 5 Ohms of calibrated measurement.

ANNEX A SIMULATING LIQUID VERIFICATION RESULT

The dielectric parameters of the liquids were verified prior to the SAR evaluation using a DAK3.5 Dielectric Probe Kit.

Head Liquid

Date	Liquid Type	Fre. (MHz)	Temp. (℃)	Meas. Conductivity (σ) (S/m)	Meas. Permittivity (ε)	Target Conductivity (σ) (S/m)	Target Permittivity (ε)	Conductivity Tolerance (%)	Permittivity Tolerance (%)
2025.07.30	Head	2450	21.2	1.82	39.29	1.80	39.20	1.11	0.23
2025.08.27	Head	2450	21.1	1.84	39.78	1.80	39.20	2.22	1.48
Note: The tolerance limit of Conductivity and Permittivity is± 5%.									

ANNEX B SYSTEM CHECK RESULT

Comparing to the original SAR value provided by SPEAG, the validation data should be within itsspecification of 10 %.

Head liquid 1g

Date	Liquid Type	Freq. (MHz)	Power (mW)	Measured SAR (W/kg)	Normalized SAR (W/kg)	Dipole SAR (W/kg)	Tolerance (%)
2025.07.30	Head	2450	100	5.360	53.60	52.60	1.90
2025.08.27	Head	2450	100	5.280	52.80	52.60	0.38
Note: The tolerance limit of System validation ±10%.							

Please refer the document “BL-SZ2571376-ASC.pdf”.

ANNEX C TEST DATA

Please refer the document “BL-SZ2571376-ATD.pdf”.

ANNEX D EUT EXTERNAL PHOT

Please refer the document “BL-SZ2571376-AW.pdf”.

ANNEX E SAR TEST SETUP PHOTOS

Please refer the document “BL-SZ2571376-AS.pdf”.

ANNEX F CALIBRATION REPORT

Please refer the document “BL-SZ2571376-AC.pdf”.

ANNEX G TUNE-UP PROCEDURE

Please refer the document “BL-SZ2571376-AT.pdf”.

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