

## SAR Compliance Test Report

|                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                       |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------|
| <b>Date of Report:</b>                                  | 7/11/2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Client's Contact person:</b>   | Arezki Guerrab                                                        |
| <b>Number of pages:</b>                                 | 38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Responsible Test engineer:</b> | Ilari Kinnunen                                                        |
| <b>Testing laboratory:</b>                              | <b>Verkotan Oy</b><br>Elektroniikkatie 17<br>90590 Oulu<br>Finland                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Client:</b>                    | <b>PARROT DRONES</b><br>174 quai de Jemmapes<br>75010 Paris<br>France |
| <b>Tested device:</b>                                   | <b>Skycontroller UKR</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                   |                                                                       |
| <b>Related reports:</b>                                 | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                   |                                                                       |
| <b>Testing has been carried out in accordance with:</b> | <p><b>47CFR §2.1093</b><br/>Radiofrequency Radiation Exposure Evaluation: Portable Devices</p> <p><b>FCC published RF exposure KDB procedures</b></p> <p><b>IEC/IEEE 62209-1528, 2020</b><br/>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</p> <p><b>RSS-102, Issue 6, 2023</b><br/>Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)</p> |                                   |                                                                       |
| <b>Documentation:</b>                                   | The test report must always be reproduced in full; reproduction of an excerpt only is subject to written approval of the testing laboratory                                                                                                                                                                                                                                                                                                                                                                               |                                   |                                                                       |
| <b>Test Results:</b>                                    | <p><b>The EUT complies with the requirements in respect of all parameters subject to the test.</b></p> <p>The test results relate only to devices specified in this document</p>                                                                                                                                                                                                                                                                                                                                          |                                   |                                                                       |
| <b>Date and signatures:</b>                             | <p>07.11.2024</p> <p><i>Miia Nurkkala</i></p> <p><b>Laboratory Manager</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                   |                                                                       |

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## 1. SUMMARY OF SAR TEST REPORT

### 1.1 Test Details

#### Device under Test (DUT):

|                                      |                                              |
|--------------------------------------|----------------------------------------------|
| <b>Product:</b>                      | Skycontroller UKR                            |
| <b>Manufacturer:</b>                 | PARROT DRONES                                |
| <b>Model:</b>                        | MPP U2                                       |
| <b>Serial Number:</b>                | PI040507AA4E000059                           |
| <b>Hardware Version:</b>             | HW_04                                        |
| <b>FCC ID Number:</b>                | 2AG6IMPPU2<br>Contains FCC ID: VPYLBAA0QB1SJ |
| <b>ISED ID Number:</b>               | 21053-MPPU2<br>Contains IC: 772C-LBAA0QB1SJ  |
| <b>DUT Number:</b>                   | 20265                                        |
| <b>Battery Type used in testing:</b> | Li-Ion Battery                               |
| <b>State of the Sample:</b>          | Production sample                            |

#### Testing information:

|                                          |                                                            |
|------------------------------------------|------------------------------------------------------------|
| <b>Testing performed:</b>                | 28.10.2024 – 05.11.2024                                    |
| <b>Notes:</b>                            | -                                                          |
| <b>Document history &amp; changes:</b>   | Initial version                                            |
| <b>Document ID:</b>                      | FCC ISED_SAR report_Skycontroller UKR_ID6824_07112024.docx |
| <b>Temperature °C</b>                    | 22±2 / Controlled                                          |
| <b>Humidity RH%</b>                      | 30±20 / Controlled                                         |
| <b>Measurement performed by:</b>         | Ilari Kinnunen                                             |
| <b>FCC Test Firm Designation Number:</b> | F10005                                                     |
| <b>ISED Company Number:</b>              | 22218                                                      |

## 1.2 Maximum Results

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

### 1.2.1 Standalone SAR

| System       | Highest Reported* SAR <sub>1g</sub> [W/kg] in Body-Worn Exposure Condition, 0mm separation distance | Result |
|--------------|-----------------------------------------------------------------------------------------------------|--------|
| 2.4 GHz Mars | 0.003                                                                                               | PASS   |
| LoRa         | 0.02                                                                                                | PASS   |

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

### 1.2.2 Simultaneous Transmission SAR

#### 1.2.2.1 FCC

| Highest Simultaneous Transmission SAR | SAR <sub>1g</sub> [W/kg] in Body-Worn Exposure Condition | Result |
|---------------------------------------|----------------------------------------------------------|--------|
| 2.4 GHz Mars + LoRa                   | 0.06                                                     | PASS   |

#### 1.2.2.2 ISED

| Highest Simultaneous Transmission SAR | SAR <sub>1g</sub> [W/kg] in Body-Worn Exposure Condition | Result |
|---------------------------------------|----------------------------------------------------------|--------|
| 2.4 GHz Mars + LoRa                   | 0.57                                                     | PASS   |

### 1.2.3 Maximum Drift

|                                   |         |
|-----------------------------------|---------|
| Maximum Drift During Measurements | 1.27dB* |
|-----------------------------------|---------|

\*Larger than 5% drifts included to scaling factors

### 1.2.4 Measurement Uncertainty

SAR 1g: 0.3 – 3 GHz:

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

## 2. DESCRIPTION OF THE DEVICE UNDER TEST (DUT)

The DUT is a drone controller that supports 2.4 GHz Mars and LoRa wireless technologies. The DUT supports two antennas for 2.4 GHz Mars, which cannot transmit simultaneously, and one antenna for LoRa. Antennas are located in the green highlighted area in the picture below.

According to "MPPUA2\_Mars & LoRa\_Radiation patterns\_DRAFT\_24042024" the maximum antenna gain for 2.4 GHz Mars is 8dBi and for Lora 2.5dBi.

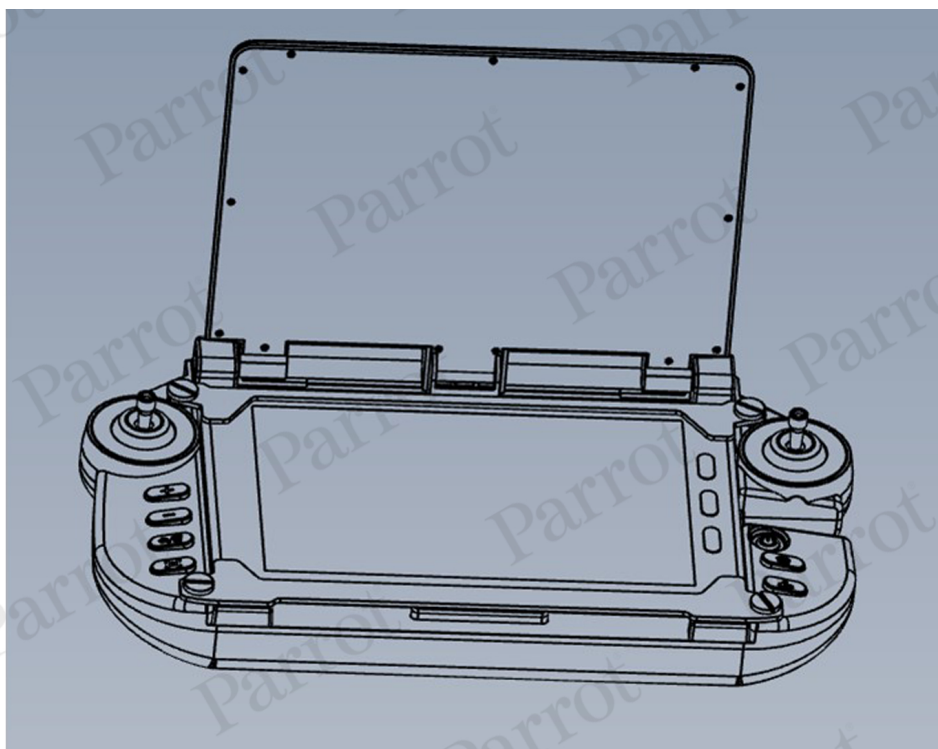


Figure 1. Overview of the DUT

|                             |                                  |
|-----------------------------|----------------------------------|
| <b>Device Category</b>      | Portable                         |
| <b>Exposure Environment</b> | General population, uncontrolled |

## 2.1 Supported Frequency Bands and Operational Modes

| TX Frequency bands | Modes of Operation | Transmitter Frequency Range [MHz] |
|--------------------|--------------------|-----------------------------------|
|                    | LoRa               | 902.3 – 914.9                     |
|                    | 2.4 GHz Mars       | 2402 – 2472                       |

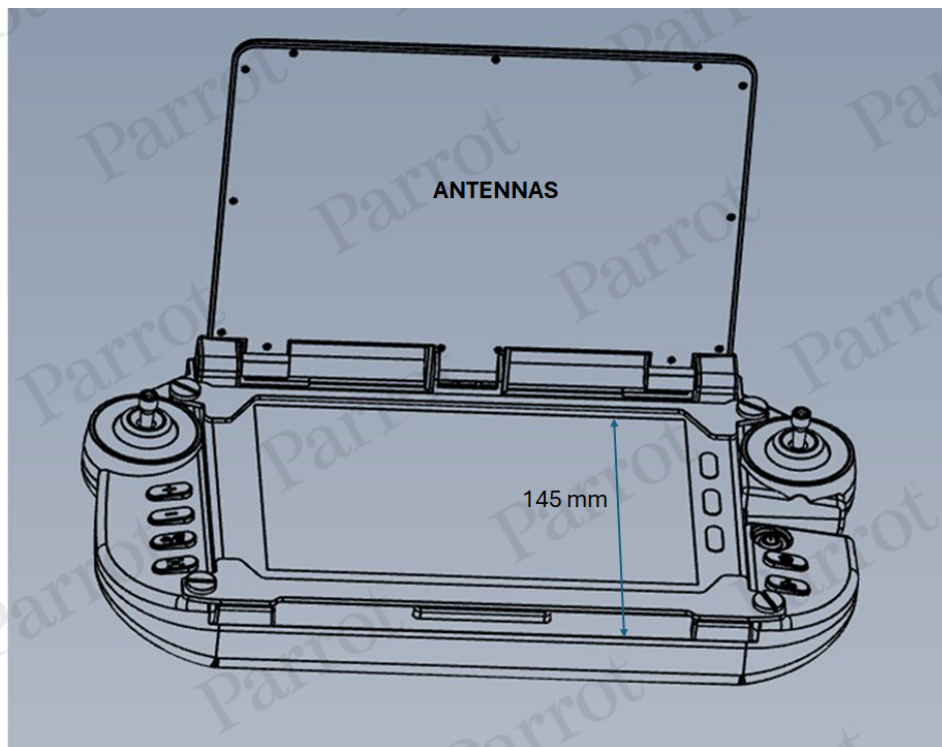
## 2.2 Simultaneous transmission

LoRa and 2.4GHz Mars can be operated simultaneously. Following simultaneous transmission combinations are supported:

- LoRa + 2.4GHz Mars antenna 1
- LoRa + 2.4GHz Mars antenna 2

## 2.3 Test Exemptions

The bottom side of the DUT is exempt from SAR testing due to 14.5cm separation distance.



### 2.3.1 FCC

300 MHz – 6 GHz:

FCC SAR test exclusion threshold is calculated according to 447498D04 Interim General RF Exposure Guidance, equation B.2 and B.1:

$$P_{th} (mW) = \begin{cases} ERP_{20\text{ cm}} (d / 20\text{ cm})^x & d \leq 20\text{ cm} \\ ERP_{20\text{ cm}} & 20\text{ cm} < d \leq 40\text{ cm} \end{cases} \quad (\text{Equation 1})$$

where

$$x = -\log_{10} \left( \frac{60}{ERP_{20\text{ cm}} \sqrt{f}} \right) \quad (\text{Equation 2})$$

and frequency  $f$  is in GHz,  $d$  is the separation distance (cm), and  $ERP_{20\text{ cm}}$  is per Equation (B.1) below.

$$ERP_{20\text{ cm}} (mW) = \begin{cases} 2040f & 0.3 \leq f < 1.5\text{ GHz} \\ 3060 & 1.5\text{ GHz} \leq f \leq 6\text{ GHz} \end{cases} \quad (\text{Equation 3})$$

| Transmission mode | Frequency [GHz] | Test Position | Separation distance [cm] | $P_{th}$ [mW] |
|-------------------|-----------------|---------------|--------------------------|---------------|
| 2.4 GHz Mars      | 2.472           | Bottom        | 14.5                     | 1659          |
| LoRa              | 0.9023          | Bottom        | 14.5                     | 1149          |

#### 2.3.1.1 Maximum defined Output Power and ERP

According to Appendix A at 447498D04 Interim General RF Exposure Guidance, the equation (B.2.) defines the thresholds for available maximum time-averaged power or maximum time-averaged ERP, whichever is greater. Since the ERP is higher than the maximum output power of the DUT for 2.4GHz Mars and LoRa, it is used for SAR test exclusion. Mars and LoRa use maximum duty cycles of 11.1% and 56.2% respectively.

| Transmission mode | Output power [dBm] | Output power [mW] | Time-Averaged Output power [dBm] | Time-Averaged Output Power [mW] | Power Gain of Antenna, G [dBi] | ERP Output power [dBm] | ERP Output power [mW] | $P_{th}$ [mW] |
|-------------------|--------------------|-------------------|----------------------------------|---------------------------------|--------------------------------|------------------------|-----------------------|---------------|
| 2.4 GHz Mars      | 25                 | 316               | 15.5                             | 35                              | 8                              | 21.3                   | <b>135</b>            | <b>1659</b>   |
| LoRa              | 22                 | 1588              | 19.5                             | 89                              | 2.5                            | 19.8                   | <b>97</b>             | <b>1149</b>   |

Maximum time-averaged ERP of the DUT's 2.4 GHz Mars transmitter is 21.3 dBm i.e. 135 mW and LoRa transmitter is 19.8 dBm i.e. 97 mW.

The maximum ERP for 2.4 GHz Mars and LoRa is below the test exclusion threshold.

### 2.3.2 ISED

SAR test exemption output power limits based on frequency and separation distance are from RSS-102, Issue 6, 2023:

**Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance**

| Frequency (MHz) | ≤ 5 mm (mW) | 10 mm (mW) | 15 mm (mW) | 20 mm (mW) | 25 mm (mW) | 30 mm (mW) | 35 mm (mW) | 40 mm (mW) | 45 mm (mW) | > 50 mm (mW) |
|-----------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|--------------|
| ≤ 300           | 45          | 116        | 139        | 163        | 189        | 216        | 246        | 280        | 319        | 362          |
| 450             | 32          | 71         | 87         | 104        | 124        | 147        | 175        | 208        | 248        | 296          |
| 835             | 21          | 32         | 41         | 54         | 72         | 96         | 129        | 172        | 228        | 298          |
| 1900            | 6           | 10         | 18         | 33         | 57         | 92         | 138        | 194        | 257        | 323          |
| 2450            | 3           | 7          | 16         | 32         | 56         | 89         | 128        | 170        | 209        | 245          |
| 3500            | 2           | 6          | 15         | 29         | 50         | 72         | 94         | 114        | 134        | 158          |
| 5800            | 1           | 5          | 13         | 23         | 32         | 41         | 54         | 74         | 102        | 128          |

| Transmission mode | Frequency [GHz] | Test Position | Separation distance [cm] | P <sub>th</sub> [mW] |
|-------------------|-----------------|---------------|--------------------------|----------------------|
| 2.4 GHz Mars      | 2.472           | Bottom        | >5                       | 243                  |
| LoRa              | 0.9023          | Bottom        | >5                       | 300                  |

#### 2.3.2.1 Maximum defined Output Power and EIRP

According to RSS-102, Issue 6, Table 11 defines the thresholds for available maximum time-averaged power or maximum time-averaged EIRP, whichever is greater. Since EIRP is higher than the maximum output power of the DUT for 2.4GHz Mars and LoRa, it is used for SAR test exclusion. Mars and LoRa use maximum duty cycles of 11.1% and 56.2% respectively.

| Transmission mode | Output power [dBm] | Output power [mW] | Time-Averaged Output Power [dBm] | Time-Averaged Output Power [mW] | Power Gain of Antenna, G [dBi] | EIRP Output power [dBm] | EIRP Output power [mW] | P <sub>th</sub> [mW] |
|-------------------|--------------------|-------------------|----------------------------------|---------------------------------|--------------------------------|-------------------------|------------------------|----------------------|
| 2.4 GHz Mars      | 25                 | 316.2             | 15.5                             | 35                              | 8                              | 23.5                    | <b>221</b>             | <b>243</b>           |
| LoRa              | 22                 | 158.5             | 19.5                             | 89                              | 2.5                            | 22.0                    | <b>158</b>             | <b>300</b>           |

Maximum time-averaged output power of the DUT's 2.4 GHz transmitter is 23.45 dBm i.e. 221.5 mW and LoRa transmitter is 22.0 dBm i.e. 158.4 mW.

The maximum EIRP for 2.4 GHz Mars and LoRa is below the test exclusion threshold.

### 3. OUTPUT POWER

#### 3.1 Maximum specified conducted output power

From the customer, including tune-up tolerances;

| Technology | Max Output Power [dBm] |
|------------|------------------------|
| LoRa       | 22                     |

| Technology   | Max Output Power [dBm] |
|--------------|------------------------|
| 2.4 GHz Mars | 25                     |

#### 3.2 Tested conducted power

Measured conducted output power at transmitting antenna connector;

| Technology   | Antenna | Frequency [MHz] | Output Power [dBm] |
|--------------|---------|-----------------|--------------------|
| 2.4 GHz Mars | 1       | 2407            | 24.03              |
| 2.4 GHz Mars | 1       | 2437            | 23.95              |
| 2.4 GHz Mars | 1       | 2467            | 23.95              |
| 2.4 GHz Mars | 2       | 2407            | 24.4               |
| 2.4 GHz Mars | 2       | 2437            | 24.71              |
| 2.4 GHz Mars | 2       | 2467            | 24.81              |

| Technology | Frequency [MHz] | Output Power [dBm] |
|------------|-----------------|--------------------|
| LoRa       | 902.4           | 20.44              |
| LoRa       | 914.2           | 20.19              |

#### 4. TEST EQUIPMENT

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

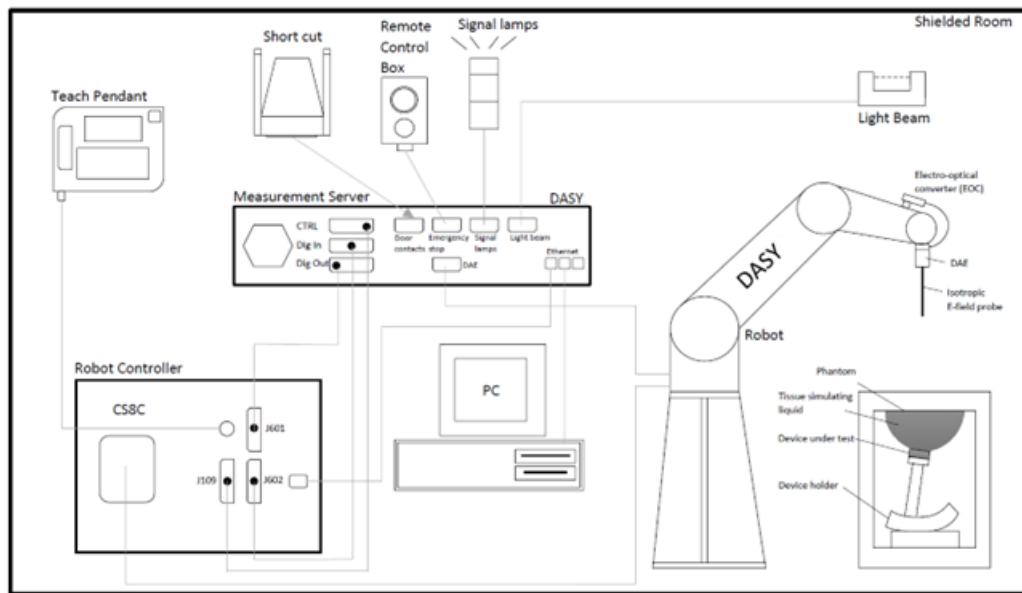


Figure 2 Schematic Laboratory Picture

#### 4.1 Test Equipment List

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

| Test Equipment                 | Model        | Serial Number          | Calibration Date | Interval [years] |
|--------------------------------|--------------|------------------------|------------------|------------------|
| Amplifier, 800MHz-4200MHz, 10W | 10S1G4A      | 320421                 | NA               | NA               |
| Amplifier, 500-8000MHz         | ZX60-83LN12+ | NA                     | NA               | NA               |
| DAE4, converter                | DAE4         | 1332                   | 02/2024          | 1                |
| Directional Power sensor       | NRT-Z44      | 107780                 | 02/2024          | 1                |
| Inline Peak Power Sensor       | MA24105A     | 2102058                | 10/2023          | 1                |
| Power Sensor                   | NRP8S        | 1419.0006K02-108508-HC | 09/2023          | 2                |
| Power Sensor                   | NRP8S        | 1419.0006K02-108509-Zh | 03/2024          | 2                |
| Isotropic DOS probe            | EX3DV4       | 7447                   | 02/2024          | 1                |
| Network Analyzer               | E5071B       | MY42301191             | 03/2024          | 1                |
| Power reflection meter         | NRT          | 835065/049             | 02/2024          | 3                |
| System validation dipole       | D2450V2      | 729                    | 07/2022          | 3                |
| System validation dipole       | D900V2       | 059                    | 03/2023          | 3                |
| Vector Signal Generator        | MG3710E      | 6262028676             | 11/2023          | 1                |
| Vector Signal Generator        | MG3710A      | 6201502519             | NA               | NA               |

Dipole calibration period supporting data:

|                          |                 | Measured on 09/2024 |                        |      | Calibrated       |                        |     |
|--------------------------|-----------------|---------------------|------------------------|------|------------------|------------------------|-----|
| Dipole and Serial Number | Frequency [MHz] | Return Loss [dB]    | Impedance [ $\Omega$ ] |      | Return Loss [dB] | Impedance [ $\Omega$ ] |     |
| D900V2-SN:059            | 900             | -23.9               | 55.4                   | 4.0  | -23.57           | 50.4                   | 6.7 |
| D2450V2-729              | 2450            | -32.1               | 50.4                   | -2.5 | -30.1            | 53.1                   | 0.8 |

#### 4.1.1 Isotropic E-field Probe Type EX3DV4

|                              |                                                                                                                                                             |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Construction</b>          | Symmetrical design with triangular core<br>Built-in shielding against static charges<br>PEEK enclosure material (resistant to organic solvents, e.g., DGBE) |
| <b>Calibration</b>           | Calibration certificate in Appendix D                                                                                                                       |
| <b>Frequency</b>             | 4 MHz to 10 GHz (dosimetry)<br>Linearity: $\pm 0.2$ dB (30 MHz to 10 GHz)                                                                                   |
| <b>Directivity (typical)</b> | $\pm 0.1$ dB in TSL (rotation around probe axis)<br>$\pm 0.3$ dB in TSL (rotation normal to probe axis)                                                     |
| <b>Dynamic Range</b>         | 10 $\mu$ W/g – > 100 mW/g<br>Linearity: $\pm 0.2$ dB (noise: typically <1 $\mu$ W/g)                                                                        |
| <b>Dimensions</b>            | Overall length: 337 mm (tip: 20 mm)<br>Tip diameter: 2.5 mm (body: 12 mm)<br>Typical distance from probe tip to dipole centers: 1 mm                        |
| <b>Application</b>           | General dosimetry up to 6 GHz<br>Compliance tests of mobile phones<br>Fast automatic scanning in arbitrary phantoms                                         |

## 4.2 Phantoms

Modular flat phantom:

The Triple Modular Phantom consists of three identical modules that can be installed and removed separately without emptying the liquid. It is used for compliance testing of small wireless devices in body-worn configurations. The phantom conforms to the requirements of IEC/IEEE 62209-1528 and FCC published RF Exposure KDB Procedures.

## 4.3 Tissue Simulants

Recommended values for the dielectric parameters of the tissue simulants are given in IEC/IEEE 62209-1528 and FCC published RF Exposure KDB Procedures. The dielectric parameters of the used tissue simulants were within  $\pm 10\%$  of the recommended values at frequencies below 3GHz. A liquid compensation algorithm was used in DASY with which measured peak average SAR values were corrected for the deviation of used liquid. Depth of the tissue simulant was at least 15.0 cm from the inner surface of the flat phantom.

| Tissue simulant liquid Ingredients |
|------------------------------------|
| Deionized Water, tween, salt       |

#### 4.4 System Validation Status

| Frequency [MHz] | Dipole Type / SN  | Probe Type / SN   | Calibrated Signal Type | DAE Unit / SN | Dielectric Constant [ $\epsilon'$ ] | Conductivity $\sigma$ [S/m] | Date    |
|-----------------|-------------------|-------------------|------------------------|---------------|-------------------------------------|-----------------------------|---------|
| 900             | D900V2 - SN: 120  | EX3DV4 - SN: 7447 | CW                     | DAE 4 /1332   | 39.98                               | 0.92                        | 03/24   |
| 2450            | D2450V2 - SN: 729 | EX3DV4 - SN: 7447 | CW                     | DAE 4 / 1332  | 36.41                               | 1.67                        | 03/2024 |

#### 4.5 System Check

| Date     | Tissue Type | Tissue Temp. [°C] | Frequency [MHz] | Input Power [mW] | Measured SAR <sub>1g</sub> [W/kg] | 1 W Target SAR <sub>1g</sub> [W/kg] | 1 W Normalized SAR <sub>1g</sub> [W/kg] | Deviation [%] | Plot # |
|----------|-------------|-------------------|-----------------|------------------|-----------------------------------|-------------------------------------|-----------------------------------------|---------------|--------|
| 28.10.24 | WB Head     | 22                | 2450            | 250              | 12.2                              | 52.3                                | 48.8                                    | -6.7%         | 1      |
| 30.10.24 | WB Head     | 22                | 2450            | 250              | 12                                | 52.3                                | 48.0                                    | -8.2%         | 2      |
| 31.10.24 | WB Head     | 22                | 2450            | 100              | 5.4                               | 52.3                                | 54.0                                    | 3.3%          | 3      |
| 04.11.24 | WB Head     | 22                | 900             | 250              | 2.76                              | 10.54                               | 11.04                                   | 4.7           | 4      |

#### 4.6 Tissue Simulant Verification

| Date     | Tissue Type | Tissue Temp [°C] | Frequency [MHz] | Measured                           |                             | Target                             |                             | Deviation      |              |
|----------|-------------|------------------|-----------------|------------------------------------|-----------------------------|------------------------------------|-----------------------------|----------------|--------------|
|          |             |                  |                 | Dielectric Constant [ $\epsilon$ ] | Conductivity $\sigma$ [S/m] | Dielectric Constant [ $\epsilon$ ] | Conductivity $\sigma$ [S/m] | $\epsilon$ [%] | $\sigma$ [%] |
| 28.10.24 | WB Head     | 22               | 2450            | 39.2                               | 1.80                        | 41.1                               | 1.89                        | 4.9            | 5.1          |
| 28.10.24 | WB Head     | 22               | 2407            | 39.3                               | 1.76                        | 41.2                               | 1.86                        | 4.9            | 5.6          |
| 28.10.24 | WB Head     | 22               | 2437            | 39.2                               | 1.79                        | 41.1                               | 1.88                        | 4.9            | 5.3          |
| 28.10.24 | WB Head     | 22               | 2467            | 39.2                               | 1.82                        | 41.1                               | 1.90                        | 4.9            | 4.8          |
| 30.10.24 | WB Head     | 22               | 2450            | 39.2                               | 1.80                        | 40.0                               | 1.88                        | 2.1            | 4.2          |
| 30.10.24 | WB Head     | 22               | 2407            | 39.3                               | 1.76                        | 40.1                               | 1.85                        | 2.1            | 4.7          |
| 30.10.24 | WB Head     | 22               | 2437            | 39.2                               | 1.79                        | 40.1                               | 1.87                        | 2.1            | 4.4          |
| 30.10.24 | WB Head     | 22               | 2467            | 39.2                               | 1.82                        | 40.0                               | 1.89                        | 2.1            | 3.8          |
| 31.10.24 | WB Head     | 22               | 2450            | 39.2                               | 1.80                        | 40.6                               | 1.88                        | 3.6            | 4.3          |
| 31.10.24 | WB Head     | 22               | 2407            | 39.3                               | 1.76                        | 40.7                               | 1.85                        | 3.6            | 4.9          |
| 31.10.24 | WB Head     | 22               | 2437            | 39.2                               | 1.79                        | 40.6                               | 1.87                        | 3.6            | 4.5          |
| 31.10.24 | WB Head     | 22               | 2467            | 39.2                               | 1.82                        | 40.6                               | 1.89                        | 3.5            | 3.9          |
| 04.11.24 | WB Head     | 22               | 900             | 41.5                               | 0.97                        | 43.7                               | 1.04                        | 5.3            | 7.2          |
| 04.11.24 | WB Head     | 22               | 902.4           | 41.5                               | 0.97                        | 43.7                               | 1.04                        | 5.3            | 7.2          |
| 04.11.24 | WB Head     | 22               | 914.2           | 41.5                               | 0.98                        | 43.6                               | 1.05                        | 5.2            | 7.2          |

## 5. TEST PROCEDURE

Testing was carried out in accordance with FCC KDB Publications 447498 D04 Interim General RF Exposure Guidance v01 and RSS-102, Issue 6.

Test configurations for SAR testing were selected based on conducted power measurements. Low, mid and high frequency channels for the configuration with the highest SAR value were tested as per ISED notice 2016-DRS001.

The DUT was set to transmit at maximum power and duty cycle using test software. 2.4 GHz Mars and LoRa use maximum duty cycles of 11.1% and 56.2% respectively.

Controller joysticks were removed for the SAR testing to enable 0mm separation distance to the SAR phantom.

### 5.1 Device Holder

The device was placed in the device holder (illustrated below) that is supplied by SPEAG as an integral part of the Dasy system.



Device holder supplied by SPEAG

### 5.2 Test Positions

#### 5.2.1 Body-worn exposure condition, 0mm separation distance

Body SAR was tested from the front, back, left and right side of the device. The device was placed in the SPEAG holder/on the top of a Rohacell and lifted towards the phantom until the distance between the phantom and the device was 0mm.

The bottom side of the DUT was exempt from SAR testing due to separation distance of 14.5cm from the antennas.

Photos of the test positions are presented in appendix A.

### 5.3 Scan Procedures

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

### 5.4 SAR Averaging Methods

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

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

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

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

## 6. MEASUREMENT UNCERTAINTY

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

## 7. TEST RESULTS

### 7.1 SAR Results for Body Exposure Condition with 0mm separation

| Band         | Frequency [MHz] | Maximum Power [dBm] | Conducted Power [dBm] | Test position | Measured SAR <sub>1g</sub> [W/kg] | Power Drift [dB]*** | Duty Cycle [%] | Scaling Factor | Reported SAR <sub>1g</sub> [W/kg] | Plot # |
|--------------|-----------------|---------------------|-----------------------|---------------|-----------------------------------|---------------------|----------------|----------------|-----------------------------------|--------|
| 2.4 GHz Mars | 2407            | 25                  | 24.03                 | Front         | 0.00222                           | 0**                 | 11.1           | 1.25           | 0.003                             | 5      |
| 2.4 GHz Mars | 2407            | 25                  | 24.03                 | Back          | 0*                                | 0**                 | 11.1           | 1.25           | 0*                                |        |
| 2.4 GHz Mars | 2407            | 25                  | 24.03                 | Left          | 0.000904                          | -0.57               | 11.1           | 1.43           | 0.001                             |        |
| 2.4 GHz Mars | 2407            | 25                  | 24.03                 | Right         | 0*                                | 0**                 | 11.1           | 1.25           | 0*                                |        |
| 2.4 GHz Mars | 2437            | 25                  | 23.95                 | Front         | 0*                                | 0**                 | 11.1           | 1.27           | 0*                                |        |
| 2.4 GHz Mars | 2467            | 25                  | 23.95                 | Front         | 0.00115                           | -0.91               | 11.1           | 1.57           | 0.002                             |        |
| 2.4 GHz Mars | 2467            | 25                  | 24.81                 | Front         | 0.00105****                       | -0.04               | 11.1           | 1.04           | 0.001                             |        |
| 2.4 GHz Mars | 2467            | 25                  | 24.81                 | Back          | 0*                                | 0**                 | 11.1           | 1.04           | 0*                                |        |
| 2.4 GHz Mars | 2467            | 25                  | 24.81                 | Left          | 0*                                | 0**                 | 11.1           | 1.04           | 0*                                |        |
| 2.4 GHz Mars | 2467            | 25                  | 24.81                 | Right         | 0*                                | 0**                 | 11.1           | 1.04           | 0*                                |        |
| 2.4 GHz Mars | 2407            | 25                  | 2407                  | Front         | 0.00239                           | 0**                 | 11.1           | 1.00           | 0.002                             |        |
| 2.4 GHz Mars | 2437            | 25                  | 2437                  | Front         | 0.000249                          | 0.79                | 11.1           | 1.00           | 0.0002                            |        |

\*Due to low e-field generated by DUT, the measurements are not applicable

\*\*Due to low e-field generated by DUT at the location of drift measurement, the measurements are not applicable

\*\*\*Larger than 5% drifts included to scaling factors

\*\*\*\*Due to the low E-field, only area scan result is available

| Band | Frequency [MHz] | Maximum Power [dBm] | Conducted Power [dBm] | Test position | Measured SAR <sub>1g</sub> [W/kg] | Power Drift [dB]*** | Duty Cycle [%] | Scaling Factor | Reported SAR <sub>1g</sub> [W/kg] | Plot # |
|------|-----------------|---------------------|-----------------------|---------------|-----------------------------------|---------------------|----------------|----------------|-----------------------------------|--------|
| LoRa | 902.4           | 22                  | 20.44                 | Front         | 0.0115                            | 0**                 | 56.2           | 1.43           | 0.02                              | 6      |
| LoRa | 902.4           | 22                  | 20.44                 | Back          | 0.000551                          | 0**                 | 56.2           | 1.43           | 0.001                             |        |
| LoRa | 902.4           | 22                  | 20.44                 | Left          | 0.00573                           | 0.66                | 56.2           | 1.67           | 0.01                              |        |
| LoRa | 902.4           | 22                  | 20.44                 | Right         | 0.00637                           | 0**                 | 56.2           | 1.43           | 0.01                              |        |
| LoRa | 914.2           | 22                  | 20.32                 | Front         | 0*                                | 0**                 | 56.2           | 1.47           | 0*                                |        |

\*Due to low e-field generated by DUT, the measurements are not applicable

\*\*Due to low e-field generated by DUT at the location of drift measurement, the measurements are not applicable

\*\*\*Larger than 5% drifts included to scaling factors

## 7.2 Zoom Scan Compliance

According to IEC/IEEE 62209-1528:2020, subclause 7.4.2 d.4), the zoom scan complies if the peak spatial-average SAR is below 0.1 W/kg, or if the following criteria is met:

1. The smallest horizontal distance from the local SAR peaks to all points 3 dB below the SAR peak is larger than the horizontal grid step.
2. Ratio of SAR at the second measured point (M2) to the SAR at the closest measured point (M1) at the x-y location of the measured maximum is at least 30%.

Zoom scan compliance according to IEC/IEEE 62209-1528:2020 is automatically verified by DASY software and all zoom scans in this test report do pass the criteria. The horizontal distance and Ratio between measurement points M2 and M1 of the highest SAR results is available in Appendix C.

### 7.3 Estimated SAR

#### 7.3.1 FCC

For simultaneous transmission evaluation the estimated standalone SAR values are calculated according to the following equation below.

$$SAR_{estimated} = 0.4 * P_{ant}/P_{th} [W/kg] \quad (\text{Equation 4})$$

$$\text{Estimated 2.4 GHz Mars SAR} = 0.4 * (135/1659) = 0.03 \text{ W/kg}$$

$$\text{Estimated LoRa SAR} = 0.4 * (97/1149) = 0.03 \text{ W/kg}$$

#### 7.3.2 ISSED

The estimated SAR value is evaluated according to the following equation stated in RSS-102, Issue 6, Section "7.1.8. SAR estimation for exempted transmitters":

$$SAR_{estimated} = \frac{P_{max}}{P_{max, exemption}} * 0.25 * SAR_{limit} \text{ W/kg}$$

where:

- $P_{max}$  is the maximum power level including tune-up tolerance for the exempted transmitter
- $P_{max, exemption}$  is the maximum power level of exemption at the same frequency and distance for the exempted transmitter
- $SAR_{limit}$  is the applicable SAR limit (e.g. 1.6 W/kg for 1 g or 4 W/kg for 10 g)

$$\text{Estimated 2.4 GHz Mars SAR} = (221/243) * 0.25 * 1.6 = 0.36 \text{ W/kg}$$

$$\text{Estimated LoRa SAR} = (158/300) * 0.25 * 1.6 = 0.21 \text{ W/kg}$$

## 7.4 Simultaneous Transmission Analysis

### 7.4.1 FCC

Simultaneous transmission analysis for the maximum LoRa SAR and 2.4 GHz Mars SAR is in the table below. Direct summation of SAR results was performed.

Body SAR:

| Exposure Condition       | Body SAR <sub>10g</sub> [W/kg] |       |       |       |        |
|--------------------------|--------------------------------|-------|-------|-------|--------|
| Test Position            | Front                          | Back  | Left  | Right | Bottom |
| Maximum LoRa SAR         | 0.003                          | 0*    | 0.001 | 0*    | 0.03   |
| Maximum 2.4 GHz Mars SAR | 0.02                           | 0.001 | 0.01  | 0.01  | 0.03   |
| SAR Summation            | 0.02                           | 0.001 | 0.01  | 0.01  | 0.06   |

\*Due to low e-field generated by DUT, the measurements are not applicable

### 7.4.2 ISED

Simultaneous transmission analysis for the maximum LoRa SAR and 2.4 GHz Mars SAR is in the table below. Direct summation of SAR results was performed.

Body SAR:

| Exposure Condition       | Body SAR <sub>10g</sub> [W/kg] |       |       |       |        |
|--------------------------|--------------------------------|-------|-------|-------|--------|
| Test Position            | Front                          | Back  | Left  | Right | Bottom |
| Maximum LoRa SAR         | 0.003                          | 0*    | 0.001 | 0*    | 0.36   |
| Maximum 2.4 GHz Mars SAR | 0.02                           | 0.001 | 0.01  | 0.01  | 0.21   |
| SAR Summation            | 0.02                           | 0.001 | 0.01  | 0.01  | 0.57   |

\*Due to low e-field generated by DUT, the measurements are not applicable

## APPENDIX B: SYSTEM CHECK SCAN

Plot 1

Date/Time: 28.10.24 14:05:36

Test Laboratory: Verkotan Oy

### DUT: Dipole 2450 MHz D2450V2

Communication System: UID 0, CW (0); Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz;

Communication System PAR: 0 dB;

Medium parameters used (interpolated):  $f = 2450$  MHz;  $\sigma = 1.892$  S/m;  $\epsilon_r = 41.126$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(7.59, 7.49, 7.65) @ 2450 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection),  $z = 31.0, -4.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASYS2 52.10.4(1527); SEMCAD X 14.6.14(7483)

**Configuration/System check 2450 MHz/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 87.71 V/m; Power Drift = -0.16 dB

Peak SAR (extrapolated) = 24.4 W/kg

**SAR(1 g) = 12.2 W/kg; SAR(10 g) = 5.78 W/kg** (SAR corrected for target medium)

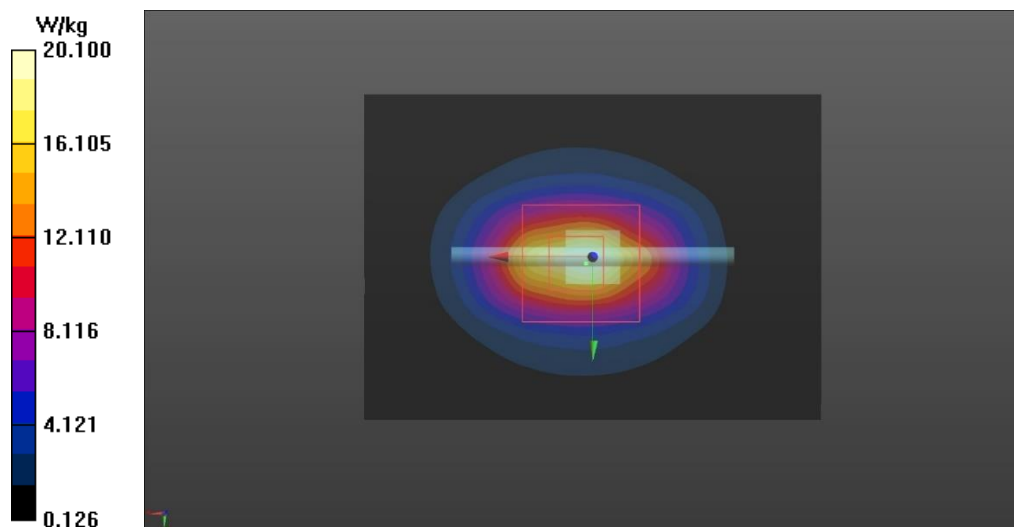
Smallest distance from peaks to all points 3 dB below = 9 mm

Ratio of SAR at M2 to SAR at M1 = 50.6%

Maximum value of SAR (measured) = 20.1 W/kg

**Configuration/System check 2450 MHz/Area Scan (71x51x1):** Interpolated grid:  $dx=1.200$  mm,  $dy=1.200$  mm

Maximum value of SAR (interpolated) = 22.5 W/kg



Plot 2

Date/Time: 30.10.24 07:57:36

Test Laboratory: Verkotan Oy

## DUT: Dipole 2450 MHz D2450V2

Communication System: UID 0, CW (0); Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz;

Communication System PAR: 0 dB;

Medium parameters used (interpolated):  $f = 2450$  MHz;  $\sigma = 1.876$  S/m;  $\epsilon_r = 40.034$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(7.59, 7.49, 7.65) @ 2450 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection),  $z = -4.0, 31.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**Configuration/System check 2450 MHz/Area Scan (71x51x1):** Interpolated grid:  $dx=1.200$  mm,  $dy=1.200$  mm

Maximum value of SAR (interpolated) = 22.3 W/kg

**Configuration/System check 2450 MHz/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 87.00 V/m; Power Drift = -0.06 dB

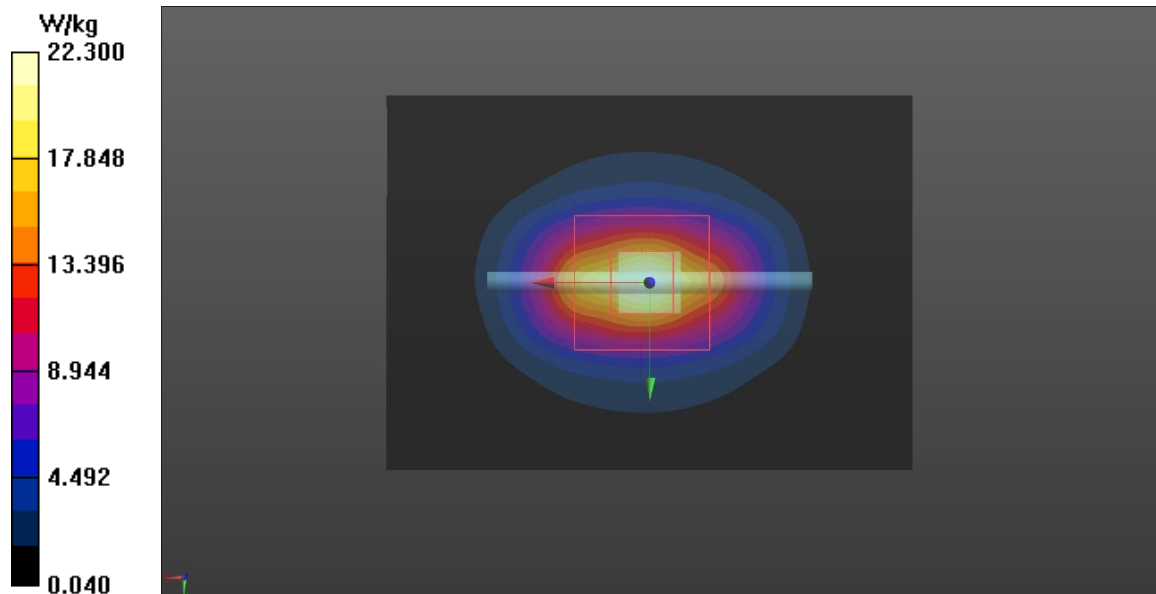
Peak SAR (extrapolated) = 24.0 W/kg

**SAR(1 g) = 12 W/kg; SAR(10 g) = 5.67 W/kg** (SAR corrected for target medium)

Smallest distance from peaks to all points 3 dB below = 9 mm

Ratio of SAR at M2 to SAR at M1 = 51%

Maximum value of SAR (measured) = 20.0 W/kg



Plot 3

Date/Time: 31.10.24 08:57:46

Test Laboratory: Verkotan Oy

## DUT: Dipole 2450 MHz D2450V2

Communication System: UID 0, CW (0); Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz;

Communication System PAR: 0 dB;

Medium parameters used (interpolated):  $f = 2450$  MHz;  $\sigma = 1.878$  S/m;  $\epsilon_r = 40.594$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(7.59, 7.49, 7.65) @ 2450 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection),  $z = 31.0, -4.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**Configuration/System check 2450 MHz/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 58.60 V/m; Power Drift = -0.18 dB

Peak SAR (extrapolated) = 10.9 W/kg

**SAR(1 g) = 5.4 W/kg; SAR(10 g) = 2.54 W/kg** (SAR corrected for target medium)

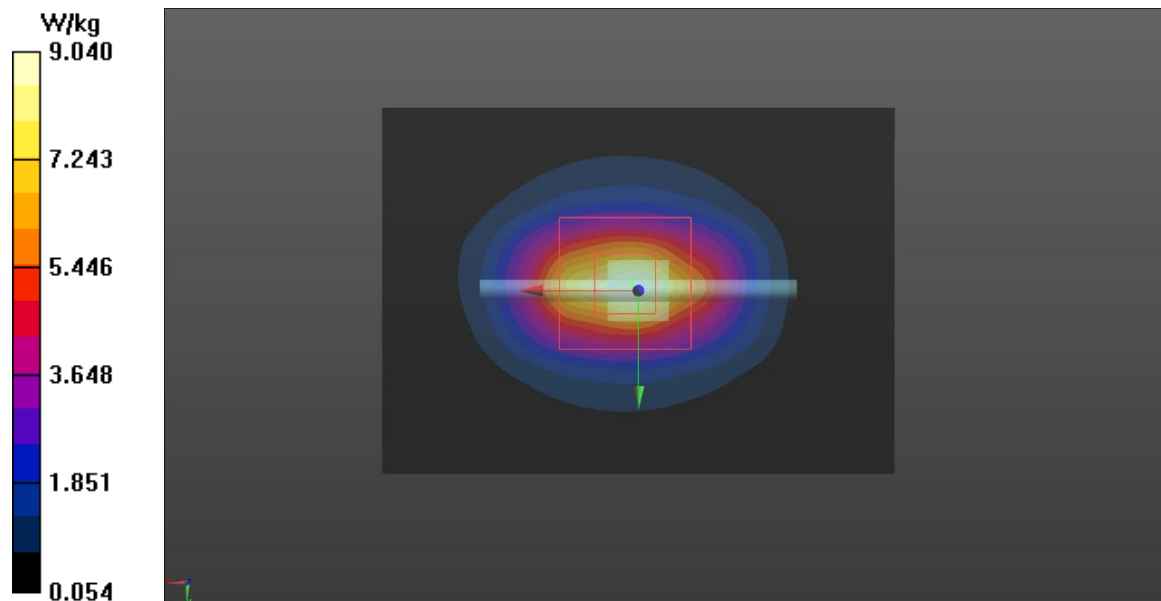
Smallest distance from peaks to all points 3 dB below = 9 mm

Ratio of SAR at M2 to SAR at M1 = 50.7%

Maximum value of SAR (measured) = 9.04 W/kg

**Configuration/System check 2450 MHz/Area Scan (71x51x1):** Interpolated grid:  $dx=1.200$  mm,  $dy=1.200$  mm

Maximum value of SAR (interpolated) = 9.78 W/kg



Plot 4

Date/Time: 4.11.24 10:57:43

Test Laboratory: Verkotan Oy

## DUT: D900V2 - SN059

Communication System: UID 0, CW (0); Communication System Band: D900 (900.0 MHz); Frequency: 900 MHz;

Communication System PAR: 0 dB;

Medium parameters used:  $f = 900$  MHz;  $\sigma = 1.04$  S/m;  $\epsilon_r = 43.705$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(8.89, 9.05, 8.92) @ 900 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection),  $z = -4.0, 31.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**System check 900 MHz/Area Scan (121x61x1):** Interpolated grid:  $dx=1.500$  mm,  $dy=1.500$  mm

Maximum value of SAR (interpolated) = 3.90 W/kg

**System check 900 MHz/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 55.79 V/m; Power Drift = -0.11 dB

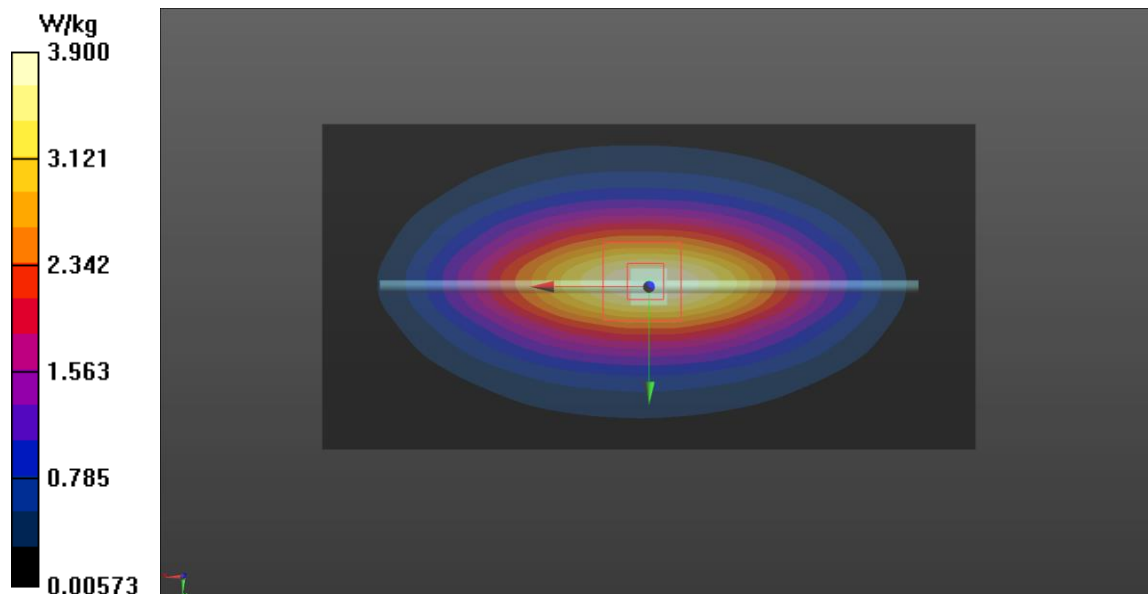
Peak SAR (extrapolated) = 4.25 W/kg

**SAR(1 g) = 2.76 W/kg; SAR(10 g) = 1.79 W/kg** (SAR corrected for target medium)

Smallest distance from peaks to all points 3 dB below = 18 mm

Ratio of SAR at M2 to SAR at M1 = 67.1%

Maximum value of SAR (measured) = 3.84 W/kg



## APPENDIX C: MEASUREMENT SCANS

Plot 5

Date/Time: 29.10.24 08:17:28

Test Laboratory: Verkotan Oy

### DUT: Skycontroller UKR

Communication System: UID 0, 2.4 GHz Proprietary (0); Communication System Band: 2.4 GHz Proprietary; Frequency: 2407 MHz;

Communication System PAR: 9.508 dB;

Medium parameters used:  $f = 2407$  MHz;  $\sigma = 1.861$  S/m;  $\epsilon_r = 41.201$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC/ANSI C63.19-2011)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(7.59, 7.49, 7.65) @ 2407 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection), Sensor-Surface: 1.4mm (Fix Surface),  $z = -4.0, 31.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASYS2 52.10.4(1527); SEMCAD X 14.6.14(7483)

**FCC, 2.4 GHz Mars, 2407MHz, Antenna 1, Front 0mm/Area Scan (231x141x1):** Interpolated grid:  $dx=1.200$  mm,  $dy=1.200$  mm

Maximum value of SAR (interpolated) = 0.00769 W/kg

**FCC, 2.4 GHz Mars, 2407MHz, Antenna 1, Front 0mm/Zoom Scan (9x10x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 1.441 V/m; Power Drift = -1.59 dB

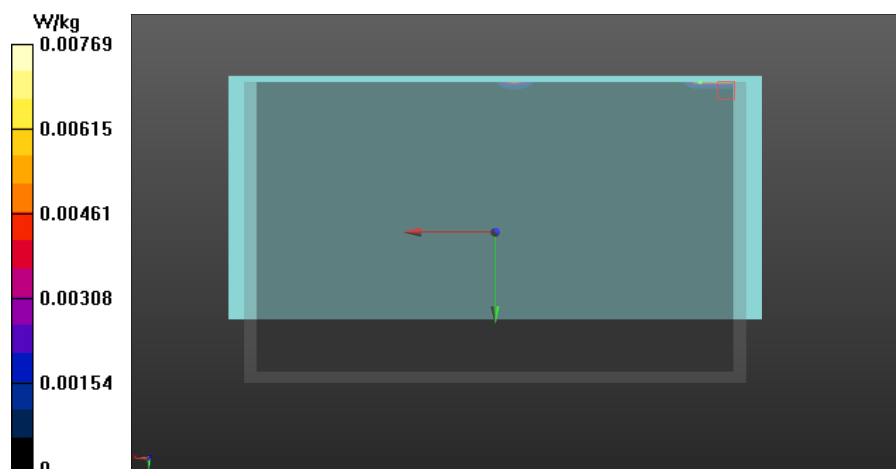
Peak SAR (extrapolated) = 0.0190 W/kg

**SAR(1 g) = 0.00222 W/kg; SAR(10 g) = n.a.** (SAR corrected for target medium)

Smallest distance from peaks to all points 3 dB below: Larger than measurement grid

Ratio of SAR at M2 to SAR at M1 = 68.3%

Maximum value of SAR (measured) = 0.00751 W/kg



Plot 6

Date/Time: 4.11.24 13:06:17

Test Laboratory: Verkotan Oy

## DUT: Skycontroller UKR

Communication System: UID 0, LoRA (0); Communication System Band: FCC; Frequency: 902.4 MHz;

Communication System PAR: 2.503 dB;

Medium parameters used (interpolated):  $f = 902.4$  MHz;  $\sigma = 1.041$  S/m;  $\epsilon_r = 43.695$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Center Section

Measurement Standard: DASYS (IEEE/IEC)

DASY Configuration:

- Probe: EX3DV4 - SN7447; ConvF(8.89, 9.05, 8.92) @ 902.4 MHz; Calibrated: 23.2.24
  - Sensor-Surface: 1.4mm (Mechanical Surface Detection), Sensor-Surface: 1.4mm (Fix Surface),  $z = -4.0, 31.0$
  - Electronics: DAE4 Sn1332; Calibrated: 14.2.24
  - Phantom: SAR1\_Phantom 1\_triple flat right; Type: QD 000 P51 Cx;
  - DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**FCC, LoRa, 902.4MHz, Front 0mm/Area Scan (191x111x1):** Interpolated grid:  $dx=1.500$  mm,  $dy=1.500$  mm

Maximum value of SAR (interpolated) = 0.00405 W/kg

**FCC, LoRa, 902.4MHz, Front 0mm/Zoom Scan (9x10x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 0 V/m; Power Drift = 0.00 dB

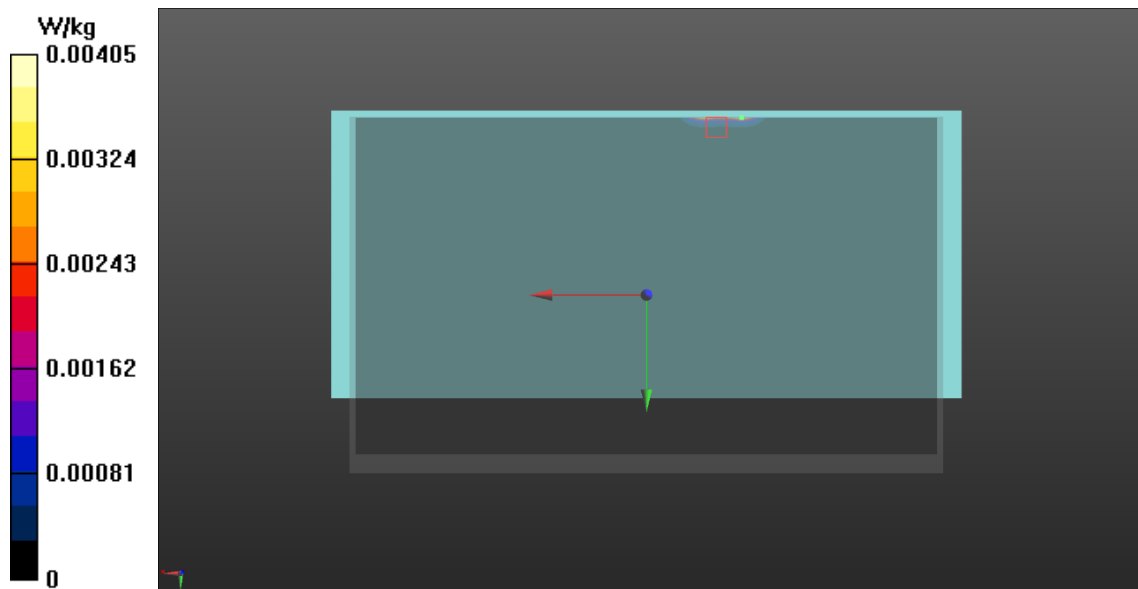
Peak SAR (extrapolated) = 0.0270 W/kg

**SAR(1 g) = 0.011 W/kg; SAR(10 g) = n.a.** (SAR corrected for target medium)

Smallest distance from peaks to all points 3 dB below: Larger than measurement grid

Ratio of SAR at M2 to SAR at M1 = 50.5%

Maximum value of SAR (measured) = 0.0237 W/kg



## APPENDIX D: RELEVANT PAGES FROM PROBE CALIBRATION REPORTS

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



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

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

Accreditation No.: SCS 0108

Client  
**Verkotan**  
Oulu, Finland

Certificate No. **EX-7447\_Feb24**

### CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:7447**

Calibration procedure(s) **QA CAL-01.v10, QA CAL-12.v10, QA CAL-14.v7, QA CAL-23.v8,  
QA CAL-25.v8  
Calibration procedure for dosimetric E-field probes**

Calibration date **February 23, 2024**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).  
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.  
All calibrations have been conducted in the closed laboratory facility; environment temperature (20 ± 3) °C and humidity < 70%.  
Calibration Equipment used (MATE critical for calibration)

| Primary Standards          | ID               | Cal Date (Certificate No.)         | Scheduled Calibration |
|----------------------------|------------------|------------------------------------|-----------------------|
| Power meter NRP2           | SN: 104778       | 30-Mar-23 (No. 217-03804/03805)    | Mar-24                |
| Power sensor NRP-291       | SN: 103244       | 30-Mar-23 (No. 217-03804)          | Mar-24                |
| DCP DAK 3.5 (weighted)     | SN: 1249         | 05-Oct-23 (DCP-DAK3.5-1249, Oct23) | Oct-24                |
| DCP DAK12                  | SN: 1016         | 05-Oct-23 (DCP-DAK12-1016, Oct23)  | Oct-24                |
| Reference 20 dB Attenuator | SN: CC2652 (20%) | 30-Mar-23 (No. 217-03806)          | Mar-24                |
| DAE4                       | SN: 660          | 16-Mar-23 (No. DAE4-660, Mar23)    | Mar-24                |
| Reference Probe EX3DV4     | SN: 7349         | 03-Nov-23 (No. EX3-7349, Nov23)    | Nov-24                |

| Secondary Standards     | ID               | Check Date (in house)             | Scheduled Check        |
|-------------------------|------------------|-----------------------------------|------------------------|
| Power meter E4419B      | SN: CB41295874   | 06-Apr-16 (in house check Jun-22) | in house check: Jun-24 |
| Power sensor E4412A     | SN: MY41466067   | 06-Apr-16 (in house check Jun-22) | in house check: Jun-24 |
| Power sensor E4412A     | SN: 000110210    | 06-Apr-16 (in house check Jun-22) | in house check: Jun-24 |
| RF generator HP 8648C   | SN: US3642U01700 | 04-Aug-99 (in house check Jun-22) | in house check: Jun-24 |
| Network Analyzer E8358A | SN: US41565477   | 31-Mar-14 (in house check Oct-22) | in house check: Oct-24 |

|                                                                                                                 | Name               | Function              | Signature                 |
|-----------------------------------------------------------------------------------------------------------------|--------------------|-----------------------|---------------------------|
| Calibrated by                                                                                                   | Aidenia Georgiadou | Laboratory Technician |                           |
| Approved by                                                                                                     | Sven Kühn          | Technical Manager     |                           |
|                                                                                                                 |                    |                       | Issued: February 23, 2024 |
| This calibration certificate shall not be reproduced except in full without written approval of the laboratory. |                    |                       |                           |

Certificate No: EX-7447\_Feb24

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EX3DV4 - SN:7447

February 23, 2024

## Parameters of Probe: EX3DV4 - SN:7447

### Basic Calibration Parameters

|                                                           | Sensor X | Sensor Y | Sensor Z | Unc (k = 2)  |
|-----------------------------------------------------------|----------|----------|----------|--------------|
| Norm [ $\mu\text{V}/(\text{V}/\text{m})^2$ ] <sup>A</sup> | 0.42     | 0.42     | 0.43     | $\pm 10.1\%$ |
| DCP (mV) <sup>B</sup>                                     | 83.9     | 92.0     | 99.2     | $\pm 4.7\%$  |

### Calibration Results for Modulation Response

| UID | Communication System Name | A<br>dB | B<br>dB $\sqrt{\mu\text{V}}$ | C    | D<br>dB | VR<br>mV | Max<br>dev. | Max<br>Unc <sup>E</sup><br>k = 2 |
|-----|---------------------------|---------|------------------------------|------|---------|----------|-------------|----------------------------------|
| 0   | CW                        | X 0.00  | 0.00                         | 1.00 | 0.00    | 132.1    | $\pm 2.0\%$ | $\pm 4.7\%$                      |
|     |                           | Y 0.00  | 0.00                         | 1.00 |         | 134.8    |             |                                  |
|     |                           | Z 0.00  | 0.00                         | 1.00 |         | 127.6    |             |                                  |

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor  $k=2$ , which for a normal distribution corresponds to a coverage probability of approximately 95%.

<sup>A</sup> The uncertainties of Norm X, Y, Z do not affect the  $E^2$ -field uncertainty inside TSL (see Page 5).

<sup>B</sup> Linearization parameter uncertainty for maximum specified field strength.

<sup>E</sup> Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

EX3DV4 - SN:7447

February 23, 2024

## Parameters of Probe: EX3DV4 - SN:7447

### Other Probe Parameters

|                                               |            |
|-----------------------------------------------|------------|
| Sensor Arrangement                            | Triangular |
| Connector Angle                               | 40.2°      |
| Mechanical Surface Detection Mode             | enabled    |
| Optical Surface Detection Mode                | disabled   |
| Probe Overall Length                          | 337 mm     |
| Probe Body Diameter                           | 10 mm      |
| Tip Length                                    | 9 mm       |
| Tip Diameter                                  | 2.5 mm     |
| Probe Tip to Sensor X Calibration Point       | 1 mm       |
| Probe Tip to Sensor Y Calibration Point       | 1 mm       |
| Probe Tip to Sensor Z Calibration Point       | 1 mm       |
| Recommended Measurement Distance from Surface | 1.4 mm     |

**Note:** Measurement distance from surface can be increased to 3–4 mm for an Area Scan job.

EX3DV4 - SN:7447

February 23, 2024

## Parameters of Probe: EX3DV4 - SN:7447

### Calibration Parameter Determined in Head Tissue Simulating Media

| f (MHz) <sup>C</sup> | Relative Permittivity <sup>E</sup> | Conductivity <sup>F</sup> (S/m) | ConvF X | ConvF Y | ConvF Z | Alpha <sup>G</sup> | Depth <sup>G</sup> (mm) | Unc (k = 2) |
|----------------------|------------------------------------|---------------------------------|---------|---------|---------|--------------------|-------------------------|-------------|
| 13                   | 55.0                               | 0.75                            | 17.59   | 17.59   | 17.59   | 0.00               | 1.25                    | ±13.3%      |
| 750                  | 41.9                               | 0.89                            | 9.63    | 9.05    | 9.58    | 0.34               | 1.27                    | ±11.0%      |
| 900                  | 41.5                               | 0.97                            | 8.89    | 9.05    | 8.92    | 0.34               | 1.27                    | ±11.0%      |
| 1750                 | 40.1                               | 1.37                            | 8.35    | 8.14    | 8.40    | 0.25               | 1.27                    | ±11.0%      |
| 1950                 | 40.0                               | 1.40                            | 7.96    | 7.80    | 8.03    | 0.27               | 1.27                    | ±11.0%      |
| 2150                 | 39.7                               | 1.53                            | 7.80    | 7.68    | 7.86    | 0.29               | 1.27                    | ±11.0%      |
| 2300                 | 39.5                               | 1.67                            | 7.75    | 7.61    | 7.75    | 0.29               | 1.27                    | ±11.0%      |
| 2450                 | 39.2                               | 1.80                            | 7.59    | 7.49    | 7.65    | 0.29               | 1.27                    | ±11.0%      |
| 2600                 | 39.0                               | 1.96                            | 7.53    | 7.40    | 7.55    | 0.28               | 1.27                    | ±11.0%      |
| 5250                 | 35.9                               | 4.71                            | 5.27    | 5.32    | 5.36    | 0.35               | 1.62                    | ±13.1%      |
| 5600                 | 35.5                               | 5.07                            | 4.42    | 4.45    | 4.52    | 0.35               | 1.75                    | ±13.1%      |
| 5750                 | 35.4                               | 5.22                            | 4.62    | 4.68    | 4.75    | 0.34               | 1.83                    | ±13.1%      |

<sup>C</sup> Frequency validity above 300 MHz of ±100 MHz only applies for DASV v4.4 and higher (see Page 2), else it is restricted to ±50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ±10, ±5, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 230 MHz respectively. Validity of ConvF assessed at 6 MHz is 4–8 MHz, and ConvF assessed at 13 MHz is 9–15 MHz. Above 5 GHz frequency validity can be extended to ±110 MHz.

<sup>E</sup> The probes are calibrated using tissue simulating liquids (TSL) that deviate for  $\epsilon'$  and  $\sigma$  by less than ±5% from the target values (typically better than ±3%) and are valid for TSL with deviations of up to ±10% if SAR correction is applied.

<sup>G</sup> Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ±1% for frequencies below 3 GHz and below ±2% for frequencies between 3–6 GHz at any distance larger than half the probe tip diameter from the boundary.

## APPENDIX E: RELEVANT PAGES FROM DIPOLE CALIBRATION REPORTS



### SAR Reference Dipole Calibration Report

Ref : ACR.68.4.23.BES.A

**VERKOTAN OY**  
ELEKTRONIIKKATIE 17  
90590, OULU, FINLAND  
**SAR REFERENCE DIPOLE**  
FREQUENCY: 900 MHZ  
SERIAL NO.: 059

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

Calibration date: 03/09/2023



Accreditations #2-6789 and #2-6814  
Scope available on [www.cofrac.fr](http://www.cofrac.fr)

The use of the Cofrac brand and the accreditation references is prohibited from any reproduction.

#### Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.

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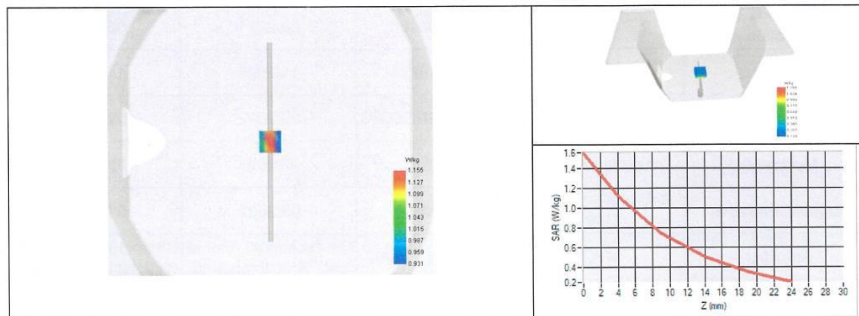


## SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.68.4.23.BES.A

|                                           |                                                         |
|-------------------------------------------|---------------------------------------------------------|
| Software                                  | OPENSAR V5                                              |
| Phantom                                   | SN 13/09 SAM68                                          |
| Probe                                     | SN 41/18 EPG0333                                        |
| Liquid                                    | Head Liquid Values: $\epsilon_p$ : 43.9 $\sigma$ : 0.92 |
| Distance between dipole center and liquid | 15.0 mm                                                 |
| Area scan resolution                      | $dx=8\text{mm}/dy=8\text{mm}$                           |
| Zoon Scan Resolution                      | $dx=8\text{mm}/dy=8\text{mm}/dz=5\text{mm}$             |
| Frequency                                 | 900 MHz                                                 |
| Input power                               | 20 dBm                                                  |
| Liquid Temperature                        | 20 +/- 1 °C                                             |
| Lab Temperature                           | 20 +/- 1 °C                                             |
| Lab Humidity                              | 30-70 %                                                 |

| Frequency | 1g SAR (W/kg) |                           |                         | 10g SAR (W/kg) |                           |                         |
|-----------|---------------|---------------------------|-------------------------|----------------|---------------------------|-------------------------|
|           | Measured      | Measured normalized to 1W | Target normalized to 1W | Measured       | Measured normalized to 1W | Target normalized to 1W |
| 900 MHz   | 1.05          | 10.54                     | 10.90                   | 0.67           | 6.73                      | 6.99                    |



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Template\_ACR.DDD.N.YY.MVGB.ISSUE\_SAR Reference Dipole vL

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



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

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

Accreditation No.: **SCS 0108**

Client **Verkotan**

Certificate No: **D2450V2-729\_Jul22**

## CALIBRATION CERTIFICATE

Object **D2450V2 - SN:729**

Calibration procedure(s) **QA CAL-05.v11  
Calibration Procedure for SAR Validation Sources between 0.7-3 GHz**

Calibration date: **July 15, 2022**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).  
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature  $(22 \pm 3)^\circ\text{C}$  and humidity  $< 70\%$ .

Calibration Equipment used (M&TE critical for calibration)

| Primary Standards           | ID #               | Cal Date (Certificate No.)      | Scheduled Calibration |
|-----------------------------|--------------------|---------------------------------|-----------------------|
| Power meter NRP             | SN: 104778         | 04-Apr-22 (No. 217-03525/03524) | Apr-23                |
| Power sensor NRP-Z91        | SN: 103244         | 04-Apr-22 (No. 217-03524)       | Apr-23                |
| Power sensor NRP-Z91        | SN: 103245         | 04-Apr-22 (No. 217-03525)       | Apr-23                |
| Reference 20 dB Attenuator  | SN: BH9394 (20k)   | 04-Apr-22 (No. 217-03527)       | Apr-23                |
| Type-N mismatch combination | SN: 310982 / 06327 | 04-Apr-22 (No. 217-03528)       | Apr-23                |
| Reference Probe EX3DV4      | SN: 7349           | 31-Dec-21 (No. EX3-7349_Dec21)  | Dec-22                |
| DAE4                        | SN: 601            | 02-May-22 (No. DAE4-601_May22)  | May-23                |

| Secondary Standards             | ID #           | Check Date (in house)             | Scheduled Check        |
|---------------------------------|----------------|-----------------------------------|------------------------|
| Power meter E4419B              | SN: GB39512475 | 30-Oct-14 (in house check Oct-20) | In house check: Oct-22 |
| Power sensor HP 8481A           | SN: US37292783 | 07-Oct-15 (in house check Oct-20) | In house check: Oct-22 |
| Power sensor HP 8481A           | SN: MY41093315 | 07-Oct-15 (in house check Oct-20) | In house check: Oct-22 |
| RF generator R&S SMT-06         | SN: 100972     | 15-Jun-15 (in house check Oct-20) | In house check: Oct-22 |
| Network Analyzer Agilent E8358A | SN: US41080477 | 31-Mar-14 (in house check Oct-20) | In house check: Oct-22 |

Calibrated by: **Name** **Function**  
**Aldona Georgiadou** **Laboratory Technician**

Approved by: **Name** **Function**  
**Niels Kuster** **Quality Manager**

Issued: July 19, 2022

Certificate No: D2450V2-729\_Jul22

Page 1 of 6

## Measurement Conditions

DASY system configuration, as far as not given on page 1.

|                              |                        |             |
|------------------------------|------------------------|-------------|
| DASY Version                 | DASY52                 | V52.10.4    |
| Extrapolation                | Advanced Extrapolation |             |
| Phantom                      | Modular Flat Phantom   |             |
| Distance Dipole Center - TSL | 10 mm                  | with Spacer |
| Zoom Scan Resolution         | dx, dy, dz = 5 mm      |             |
| Frequency                    | 2450 MHz $\pm$ 1 MHz   |             |

## Head TSL parameters

The following parameters and calculations were applied.

|                                         | Temperature         | Permittivity   | Conductivity         |
|-----------------------------------------|---------------------|----------------|----------------------|
| Nominal Head TSL parameters             | 22.0 °C             | 39.2           | 1.80 mho/m           |
| Measured Head TSL parameters            | (22.0 $\pm$ 0.2) °C | 37.9 $\pm$ 6 % | 1.85 mho/m $\pm$ 6 % |
| Head TSL temperature change during test | < 0.5 °C            |                |                      |

## SAR result with Head TSL

| SAR averaged over 1 cm <sup>3</sup> (1 g) of Head TSL | Condition          |                              |
|-------------------------------------------------------|--------------------|------------------------------|
| SAR measured                                          | 250 mW input power | 13.4 W/kg                    |
| SAR for nominal Head TSL parameters                   | normalized to 1W   | 52.3 W/kg $\pm$ 17.0 % (k=2) |

| SAR averaged over 10 cm <sup>3</sup> (10 g) of Head TSL | condition          |                              |
|---------------------------------------------------------|--------------------|------------------------------|
| SAR measured                                            | 250 mW input power | 6.21 W/kg                    |
| SAR for nominal Head TSL parameters                     | normalized to 1W   | 24.5 W/kg $\pm$ 16.5 % (k=2) |