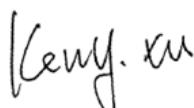


Power Density Measurement Report

| | |
|---------------------------------|--|
| Application No.: | SZCR2501000226IT |
| Applicant: | Shanghai Sunmi Technology Co.,Ltd. |
| Address of Applicant: | Room 505, No.388, Song Hu Road, Yang Pu District, Shanghai, China |
| Manufacturer: | Shanghai Sunmi Technology Co.,Ltd. |
| Address of Manufacturer: | Room 505, No.388, Song Hu Road, Yang Pu District, Shanghai, China |
| Product Name: | Wireless Data Terminal |
| Model No.: | TF31B |
| Trade Mark: | SUNMI |
| FCC ID: | 2AH25M3L |
| Standards: | FCC 47CFR §2.1093 IEC/IEEE 63195-1:2022 IEC/IEEE 62209-1528:2020 |
| Date of Receipt: | 2025/01/08 |
| Date of Test: | 2025/03/21 |
| Date of Issue: | 2025/05/21, Amendment 02: 2025/06/09 |

| | |
|-------------------------|---------------|
| Test conclusion: | PASS * |
|-------------------------|---------------|

*In the configuration tested, the EUT detailed in this report complied with the standards specified above.



Keny Xu

EMC Laboratory Manager



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SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

SZSAR-TRF-01 Rev. A/0 May15,2023

Report No.: SZCR250100022601

Amendment 02

Page: 2 of 18

Revision History

| Report Number | Revision | Description | Issue Date |
|------------------|----------|-------------|------------|
| SZCR250100022601 | 01 | Original | 2025/05/12 |
| SZCR250100022601 | 02 | PAG Comment | 2025/06/09 |

This report supersedes our previous report SZCR250100022601, issued on 2025/05/21, which is hereby deemed null and void.

| | | | | |
|--------------------------|--|--------------------------------|--|--|
| Authorized for issue by: | | | | |
| | | | | |
| | | Calvin Weng / Project Engineer | | |
| | | | | |
| | | Eric Fu / Reviewer | | |



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SZSAR-TRF-01 Rev. A/0 May15,2023

Report No.: SZCR250100022601

Amendment 02

Page: 3 of 18

TEST SUMMARY

| Frequency Band | Reported PD (W/m ²) |
|----------------|---------------------------------|
| WIFI 6E | 9.87 |
| PD Limit | 10 |



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CONTENTS

| | |
|--|-----------|
| 1 General Information | 5 |
| 1.1 Test Location | 5 |
| 1.2 General Description of EUT..... | 5 |
| 1.3 Test Specification | 6 |
| 1.4 RF exposure limit for above 6GHz | 7 |
| 2 System Description and Setup | 8 |
| 2.1 Power density measurement system | 8 |
| 2.2 EUmmWaVe probe..... | 9 |
| 2.3 Scan configuration..... | 10 |
| 3 System Verification Procedure | 11 |
| 3.1 PD Test System Verification..... | 11 |
| 3.2 PD System Verification Results..... | 12 |
| 3.3 Detailed System Check Results | 12 |
| 4 Measurement Data | 13 |
| 4.1 Measurement of RF Conducted Power..... | 13 |
| 4.2 PD Test Data | 15 |
| 5 Equipment list..... | 16 |
| 6 Measurement Uncertainty | 17 |
| 7 Calibration certificate | 18 |
| 8 Photographs | 18 |
| Appendix A: Detailed System Check Results | 18 |
| Appendix B: Detailed Test Results | 18 |
| Appendix C: Calibration certificate | 18 |
| Appendix D: Photographs..... | 18 |



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1 General Information

1.1 Test Location

| | |
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| Address: | No. 1 Workshop, M-10, Middle section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China |
| Post code: | 518057 |
| Test Engineer: | Bert Xu |

1.2 General Description of EUT

| | | | |
|--------------------|---|-----------|-----------|
| Device Type : | portable device | | |
| Exposure Category: | uncontrolled environment / general population | | |
| Product Name: | Wireless Data Terminal | | |
| Model No.(EUT): | TF31B | | |
| FCC ID: | 2AH25M3L | | |
| Product Phase: | production unit | | |
| Hardware Version: | V1.2 | | |
| Software Version: | T602AA_EVT_14.0_SUNMI_202503131820.00-00 | | |
| Modulation Mode: | OFDMA | | |
| Frequency Bands: | Band | Tx (MHz) | Rx (MHz) |
| | UNII-5 | 5925-6425 | 5925-6425 |
| | UNII-6 | 6425-6525 | 6425-6525 |
| | UNII-7 | 6525-6875 | 6525-6875 |
| | UNII-8 | 6875-7125 | 6875-7125 |

Note:

1. Since the above data and/or information is provided by the client relevant results or conclusions of this report are only made for these data and/or information, SGS is not responsible for the authenticity, integrity and results of the data and information and/or the validity of the conclusion.
2. As above information is provided and confirmed by the applicant. SGS is not liable to the accuracy, suitability, reliability or/and integrity of the information.
3. The device does not support 802.11ax OFDMA Partial RU tones (26T, 52T, 106T, etc.)



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1.3 Test Specification

| Identity | Document Title |
|--------------------------|---|
| FCC 47CFR §2.1093 | Radiofrequency Radiation Exposure Evaluation: Portable Devices |
| ANSI/IEEE C95.1-1992 | IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz. |
| IEC/IEEE 62209-1528:2020 | Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz) |
| IEC/IEEE 63195-1:2022 | Assessment of power density of human exposure to radio frequency fields from wireless devices in close proximity to the head and body (frequency range of 6 GHz to 300 GHz) – Part 1: Measurement procedure |
| KDB 447498 D04 | Interim General RF Exposure Guidance v01 |
| KDB 248227 D01 | SAR Guidance for IEEE 802.11 Wi-Fi SAR v02r02 |



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1.4 RF exposure limit for above 6GHz

According to ANSI/IEEE C95.1-1992, the criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio frequency (RF) radiation as specified in §1.1310.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes

| Frequency range (MHz) | Electric field strength (V/m) | Magnetic field strength (A/m) | Power density (mW/cm ²) | Averaging time (minutes) |
|--|-------------------------------|-------------------------------|-------------------------------------|--------------------------|
| (A) Limits for Occupational/Controlled Exposures | | | | |
| 0.3-3.0 | 614 | 1.63 | *(100) | 6 |
| 3.0-30 | 1842/f | 4.89/f | *(900/f ²) | 6 |
| 30-300 | 61.4 | 0.163 | 1.0 | 6 |
| 300-1500 | | | f/300 | 6 |
| 1500-100,000 | | | 5 | 6 |
| (B) Limits for General Population/Uncontrolled Exposure | | | | |
| 0.3-1.34 | 614 | 1.63 | *(100) | 30 |
| 1.34-30 | 824/f | 2.19/f | *(180/f ²) | 30 |
| 30-300 | 27.5 | 0.073 | 0.2 | 30 |
| 300-1500 | | | f/1500 | 30 |
| 1500-100,000 | | | 1.0 | 30 |

Note: 1.0 mW/cm² is equal to 10 W/m²

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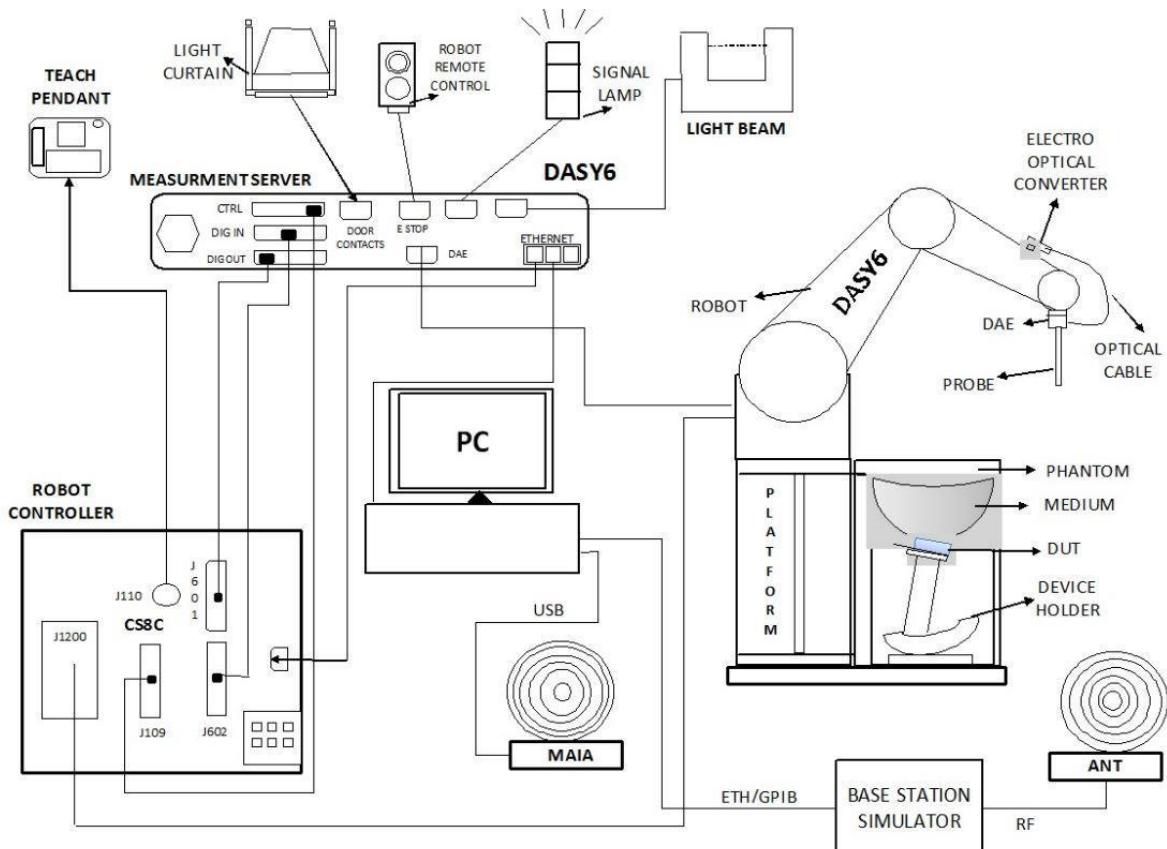
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2 System Description and Setup

2.1 Power density measurement system

Power density measurements for mmWave frequencies were performed using SPEAG DASY6 with cDASY6 5G module. The DASY6 included a high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the 5G phantom cover.



Measurement System Configuration



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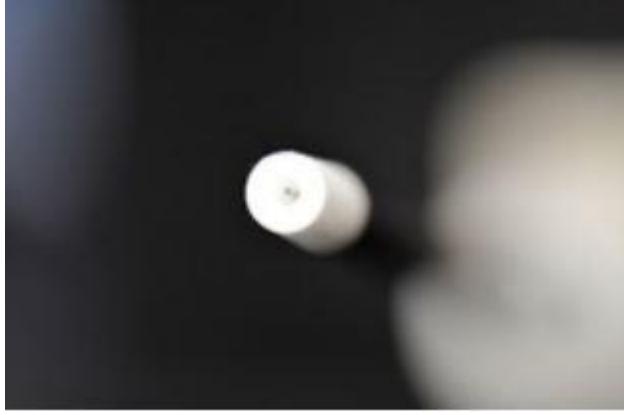
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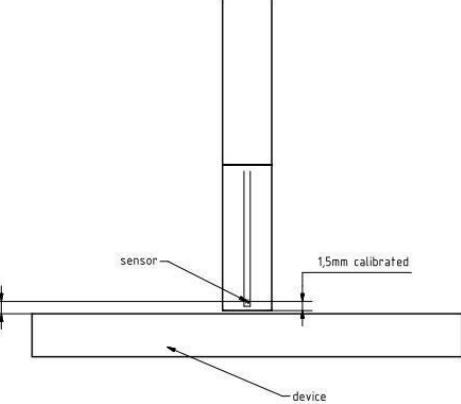
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2.2 EUmmWaVe probe

| | |
|--|--|
| Frequency | 750 MHz – 110 GHz |
| Probe Overall Length | 320 mm |
| Probe Body Diameter | 8.0 mm |
| Tip Length | 23.0 mm |
| Tip Diameter | 8.0 mm |
| Probe's two dipoles length | 0.9 mm – Diode loaded |
| Dynamic Range | < 20 V/m - 10000 V/m with PRE-10 (min < 50 V/m - 3000 V/m) |
| Position Precision | < 0.2 mm |
| Distance between diode sensors and probe's tip | 1.5 mm |
| Minimum Mechanical separation between probe tip and a Surface | 0.5 mm |
| Applications | E-field measurements of 5G devices and other mm-wave transmitters operating above 10GHz in < 2 mm distance from device (free-space) Power density, H-field and far-field analysis using total field reconstruction. |
| Compatibility | cDASY6 + 5G-Module SW1.0 and higher |





The EUmmWaVe probe is based on the pseudo-vector probe design, which not only measures the field magnitude but also derives its polarization ellipse. The design entails two small 0.8mm dipole sensors mechanically protected by high-density foam, printed on both sides of a 0.9mm wide and 0.12mm thick glass substrate. The body of the probe is specifically constructed to minimize distortion by the scattered fields. The probe consists of two sensors with different angles (1 and 2) arranged in the same plane in the probe axis. Three or more measurements of the two sensors are taken for different probe rotational angles to derive the amplitude and polarization information. The probe design allows measurements at distances as small as 2mm from the sensors to the surface of the device under test (DUT). The typical sensor to probe tip distance is 1.5 mm. The exact distance is calibrated.

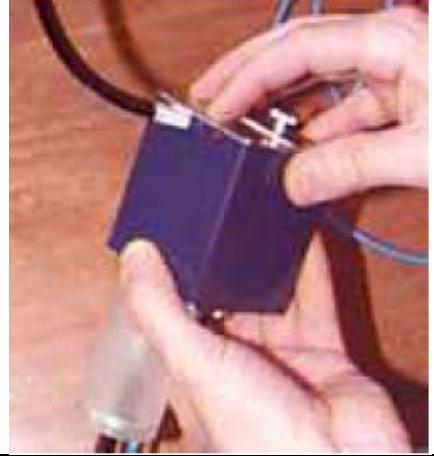


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Data Acquisition Electronics (DAE)

| Model | DAE | |
|-----------------------------|--|---|
| Construction | Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop. |  |
| Measurement Range | -100 to +300 mV (16-bit resolution and two range settings: 4mV, 400mV) | |
| Input Offset Voltage | < 5µV (with auto zero) | |
| Input Bias Current | < 50 f A | |
| Dimensions | 60 x 60 x 68 mm | |

2.3 Scan configuration

Fine-resolution scans on 2 different planes are performed to reconstruct the E- and H-fields as well as the power density; the z-distance between the 2 planes is set to $\lambda/4$. The (x, y) grid step is also set $\lambda/4$, the grid extent is set to sufficiently large to identify the field pattern and the peak.



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3 System Verification Procedure

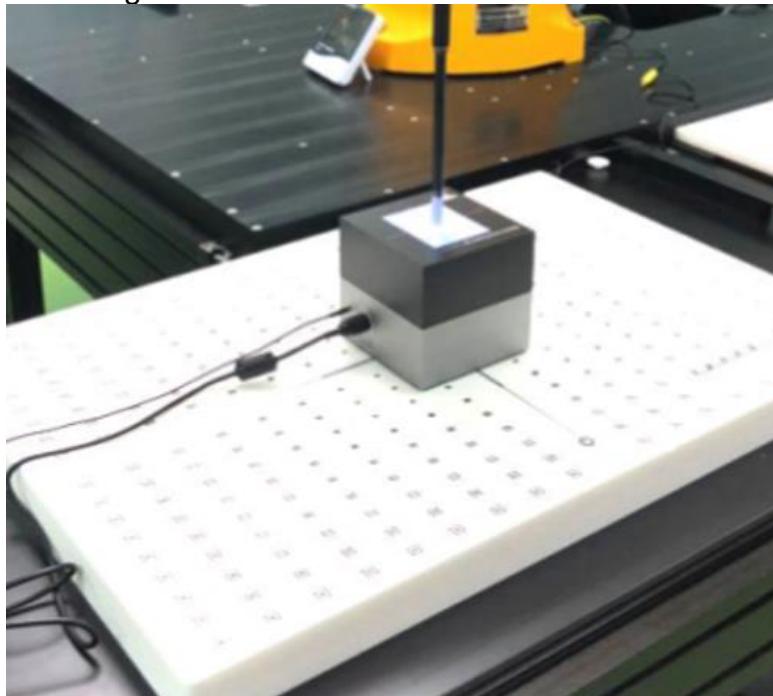
3.1 PD Test System Verification

The system was verified to be within ± 0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

| Frequency [GHz] | Grid step | Grid extent X/Y [mm] | Measurement points |
|-----------------|------------------------------|----------------------|--------------------|
| 10 | 0.25 ($\frac{\lambda}{4}$) | 120/120 | 16 \times 16 |
| 30 | 0.25 ($\frac{\lambda}{4}$) | 60/60 | 24 \times 24 |
| 60 | 0.25 ($\frac{\lambda}{4}$) | 32.5/32.5 | 26 \times 26 |
| 90 | 0.25 ($\frac{\lambda}{4}$) | 30/30 | 36 \times 36 |

Settings for measurement of verification sources



System Verification Setup Photo



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3.2 PD System Verification Results

| Frequent | Measured PD W/m ² | Target PD W/m ² | Circular Deviation (Within ±0.66dB) | Test Date |
|---------------|---------------------------------|-------------------------------|--|------------|
| | 4cm ² | 4cm ² | 4cm ² | |
| 10G HZ Source | 203.00 | 183 | 0.45 | 2025/03/21 |

3.3 Detailed System Check Results

Please see the Appendix A



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4 Measurement Data

1. The PD test was performed of a 2mm separation between sensor and EUT surface (the probe tip is 0.5mm to the EUT surface), 2 mm separation distance PD testing is for hotspot and body worn exposure conditions.
2. According to TCBC Workshop in October 2018, 4 cm² averaging area are used.

4.1 Measurement of RF Conducted Power

| WIFI 6E Full power | | | | ANT2 | | ANT3 | | MIMO | |
|--------------------|---------|----------------|-----------------|---------------------|---------|---------------------|---------|---------------------|---------|
| mode | Channel | Frequency(MHz) | Data Rate(Mbps) | Average Power (dBm) | Tune up | Average Power (dBm) | Tune up | Average Power (dBm) | Tune up |
| 802.11ax (HE20) | 1 | 5955 | MCS0 | 8.47 | 9.5 | 8.27 | 9.5 | 11.38 | 12.5 |
| | 97 | 6435 | | 8.66 | 10 | 8.41 | 9.5 | 11.55 | 13 |
| | 117 | 6535 | | 8.48 | 9.5 | 8.19 | 9.5 | 11.35 | 12.5 |
| | 189 | 6895 | | -2.18 | -1 | -2.43 | -1 | 0.71 | 2 |
| | 233 | 7115 | | -4.65 | -3.5 | -4.88 | -3.5 | -1.75 | -0.5 |
| 802.11ax (HE40) | 3 | 5965 | MCS0 | 9.26 | 10.5 | 9.03 | 10.5 | 12.16 | 13.5 |
| | 99 | 6445 | | 9.44 | 10.5 | 9.19 | 10.5 | 12.32 | 13.5 |
| | 147 | 6685 | | 9.63 | 11 | 9.38 | 10.5 | 12.52 | 14 |
| | 195 | 6925 | | 9.30 | 10.5 | 9.05 | 10.5 | 12.19 | 13.5 |
| | 227 | 7085 | | 9.75 | 11 | 9.47 | 10.5 | 12.62 | 14 |
| 802.11ax (HE80) | 7 | 5985 | MCS0 | 9.53 | 11 | 9.29 | 10.5 | 12.42 | 13.5 |
| | 103 | 6465 | | 10.05 | 11 | 9.91 | 11 | 12.99 | 14 |
| | 151 | 6705 | | 9.68 | 11 | 9.47 | 10.5 | 12.58 | 14 |
| | 199 | 6945 | | 9.30 | 10.5 | 9.03 | 10.5 | 12.18 | 13.5 |
| | 215 | 7025 | | 9.90 | 11 | 9.61 | 11 | 12.76 | 14 |

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SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

SZSAR-TRF-01 Rev. A/0 May15,2023

Report No.: SZCR250100022601

Amendment 02

Page: 14 of 18

| WIFI 6E Full power For Simultaneous | | | ANT2 | | ANT3 | | MIMO | | |
|-------------------------------------|---------|----------------|-----------------|---------------------|---------|---------------------|---------|---------------------|-----------|
| mode | Channel | Frequency(MHz) | Data Rate(Mbps) | Average Power (dBm) | Tune up | Average Power (dBm) | Tune up | Average Power (dBm) | Tune up |
| 802.11ax (HE20) | 1 | 5955 | MCS0 | 4.52 | 5.5 | 4.36 | 5.5 | 7.45 | 8.5 |
| | 97 | 6435 | | 4.73 | 6 | 4.39 | 5.5 | 7.57 | 9 |
| | 117 | 6535 | | 4.61 | 5.5 | 4.08 | 5.5 | 7.36 | 8.5 |
| | 189 | 6895 | | -2.18 | -1 | -2.43 | -1 | 0.71 | 2 |
| | 233 | 7115 | | -4.65 | -3.5 | -4.88 | -3.5 | -1.75 | -0.5 |
| 802.11ax (HE40) | 3 | 5965 | MCS0 | 5.28 | 6.5 | 5.11 | 6.5 | 8.21 | 9.5 |
| | 99 | 6445 | | 5.45 | 6.5 | 5.25 | 6.5 | 8.36 | 9.5 |
| | 147 | 6685 | | 5.66 | 7 | 5.46 | 6.5 | 8.57 | 10 |
| | 195 | 6925 | | 5.32 | 6.5 | 5.13 | 6.5 | 8.24 | 9.5 |
| | 227 | 7085 | | 5.75 | 7 | 5.44 | 6.5 | 8.61 | 10 |
| 802.11ax (HE80) | 7 | 5985 | MCS0 | 5.58 | 7 | 5.29 | 6.5 | 8.45 | 9.5 |
| | 103 | 6465 | | 6.11 | 7 | 5.88 | 7 | 9.01 | 10 |
| | 151 | 6705 | | 5.66 | 7 | 5.44 | 6.5 | 8.56 | 10 |
| | 199 | 6945 | | 5.31 | 6.5 | 5.02 | 6.5 | 8.18 | 9.5 |
| | 215 | 7025 | | 5.98 | 7 | 5.60 | 7 | 8.80 | 10 |

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4.2 PD Test Data

| Wi-Fi 6E PD Test Record MIMO | | | | | | | | | | | | | | | | |
|------------------------------|--------------|----------------|---------------|---------------|------------|--------------------------|------|-----------|--|------------------|----------------------|--------------------|--|-----------------------|--|--|
| Test position | Test mode | Test ch./Freq. | Distance (mm) | Grid Step (λ) | Duty Cycle | Duty Cycle Scaled factor | iPDn | iPD ratio | Measured PD 4cm ² (W/m ²) | Power drift (dB) | Conducted Power(dBm) | Tune up Limit(dBm) | Scaling Factor for measurement uncertainty | Tune up Scaled factor | Scaled PD 4cm ² (W/m ²) | |
| Power Density Test DATA | | | | | | | | | | | | | | | | |
| Back side | 802.11ax 80M | 103/6465 | 2 | 0.0625 | 88.99% | 1.124 | / | / | 0.968 | 0.06 | 12.99 | 14.00 | 1.5493 | 1.262 | 2.127 | |
| Top side | 802.11ax 80M | 103/6465 | 2 | 0.0625 | 88.99% | 1.124 | 9.21 | 0.03 | 2.82 | 0.09 | 12.99 | 14.00 | 1.5493 | 1.262 | 6.197 | |
| Top side | 802.11ax 80M | 103/6465 | 9.3 | 0.0625 | 88.99% | 1.124 | 9.15 | | 0.721 | 0.01 | 12.99 | 14.00 | 1.5493 | 1.262 | 1.584 | |
| Top side | 802.11ax 80M | 7/5985 | 2 | 0.0625 | 88.99% | 1.124 | / | / | 3.63 | 0.06 | 12.42 | 13.50 | 1.5493 | 1.282 | 8.105 | |
| Top side | 802.11ax 80M | 151/6705 | 2 | 0.0625 | 88.99% | 1.124 | / | / | 3.47 | 0.13 | 12.58 | 14.00 | 1.5493 | 1.385 | 8.370 | |
| Top side | 802.11ax 80M | 199/6945 | 2 | 0.0625 | 88.99% | 1.124 | / | / | 4.18 | 0.01 | 12.18 | 13.50 | 1.5493 | 1.356 | 9.872 | |
| Top side | 802.11ax 80M | 215/7025 | 2 | 0.0625 | 88.99% | 1.124 | / | / | 4.09 | -0.09 | 12.76 | 14.00 | 1.5493 | 1.329 | 9.467 | |

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5 Equipment list

| Test Platform | SPEAG DASY Professional | | | | |
|--|------------------------------------|-------------|---------------|------------------|-------------------------|
| Description | PD Test System | | | | |
| Software Reference | cDASY6 V2.2.0.76 | | | | |
| Hardware Reference | | | | | |
| Equipment | Manufacturer | Model | Inventory No. | Calibration Date | Due date of calibration |
| <input checked="" type="checkbox"/> Test Phantom | SPEAG | mmWave | SZ-WSR-A-029 | NCR | NCR |
| <input checked="" type="checkbox"/> DAE | SPEAG | DAE4 | SZ-WSR-M-031 | 2025-02-17 | 2026-02-16 |
| <input checked="" type="checkbox"/> E-U Probe | SPEAG | EUmmWV4 | SZ-WSR-M-048 | 2024/8/23 | 2025/8/22 |
| <input checked="" type="checkbox"/> 5G Verification Source | SPEAG | 10GHz | SZ-WSR-M-048 | 2024/8/20 | 2025/8/19 |
| <input checked="" type="checkbox"/> Dielectric parameter probes | SPEAG | DAKS-3.5 | SZ-WSR-M-053 | 2024/6/26 | 2025/6/25 |
| <input checked="" type="checkbox"/> RF Bi-Directional Coupler | Agilent | 86205-60001 | SZ-WSR-A-004 | NCR | NCR |
| <input checked="" type="checkbox"/> Signal Generator | Agilent | N5171B | SZ-WSR-M-006 | 2025/1/7 | 2026/1/6 |
| <input checked="" type="checkbox"/> Preamplifier | Mini-Circuits | ZHL-42W | SZ-WSR-A-001 | NCR | NCR |
| <input checked="" type="checkbox"/> Preamplifier | Compliance Directions Systems Inc. | AMP28-3W | SZ-WSR-A-002 | NCR | NCR |
| <input checked="" type="checkbox"/> Power Meter | Agilent | E4416A | SZ-WSR-M-007 | 2025/1/7 | 2026/1/6 |
| <input checked="" type="checkbox"/> Power Sensor | Agilent | 8481H | SZ-WSR-M-008 | 2025/1/7 | 2026/1/6 |
| <input checked="" type="checkbox"/> Power Sensor | R&S | NRP-Z92 | SZ-WSR-M-009 | 2025/1/8 | 2026/1/7 |
| <input checked="" type="checkbox"/> Attenuator | SHX | TS2-3dB | SZ-WSR-A-012 | NCR | NCR |
| <input checked="" type="checkbox"/> Humidity and Temperature Indicator | CHIGAO | HTC-1 | SZ-WSR-M-013 | 2024/05/28 | 2025/05/27 |



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6 Measurement Uncertainty

| a | b | c | d | e | f=b*e/d | g |
|--------------------------------------|-------------------------------|-------------|-------|----|----------------------------------|-----------|
| Error Description | Uncertainty Value (\pm dB) | Probability | Div. | Ci | Standard Uncertainty (\pm dB) | Vi (Veff) |
| Probe Calibration | 0.49 | N | 1 | 1 | 0.49 | ∞ |
| Probe correction | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Frequency response (BW \leq 1 GHz) | 0.20 | R | 1.732 | 1 | 0.12 | ∞ |
| Sensor cross coupling | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Isotropy | 0.50 | R | 1.732 | 1 | 0.29 | ∞ |
| Linearity | 0.20 | R | 1.732 | 1 | 0.12 | ∞ |
| Probe scattering | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Probe positioning offset | 0.30 | R | 1.732 | 1 | 0.17 | ∞ |
| Probe positioning repeatability | 0.04 | R | 1.732 | 1 | 0.02 | ∞ |
| Sensor mechanical offset | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Probe spatial resolution | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Field impedance dependence | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Amplitude and phase drift | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Amplitude and phase noise | 0.04 | R | 1.732 | 1 | 0.02 | ∞ |
| Measurement area truncation | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Data acquisition | 0.03 | N | 1 | 1 | 0.03 | ∞ |
| Sampling | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Field reconstruction | 2.00 | R | 1.732 | 1 | 1.15 | ∞ |
| Forward transformation | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Power density scaling | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Spatial averaging | 0.10 | R | 1.732 | 1 | 0.06 | ∞ |
| System detection limit | 0.04 | R | 1.732 | 1 | 0.02 | ∞ |
| Probe coupling with DUT | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Modulation response | 0.40 | R | 1.732 | 1 | 0.23 | ∞ |
| Integration time | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Response time | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Device holder influence | 0.10 | R | 1.732 | 1 | 0.06 | ∞ |
| DUT alignment | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| RF ambient conditions | 0.04 | R | 1.732 | 1 | 0.02 | ∞ |
| Ambient reflections | 0.04 | R | 1.732 | 1 | 0.02 | ∞ |
| Immunity / secondary reception | 0.00 | R | 1.732 | 1 | 0.00 | ∞ |
| Drift of the DUT | | R | 1.732 | 1 | 0.00 | ∞ |
| Combined Std. Uncertainty | | | | | 1.33 | |
| Expanded STD Uncertainty (95%), K=2 | | | | | 2.67 | |



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7 Calibration certificate

Please see the Appendix C

8 Photographs

Please see the Appendix D

Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs

---END---



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