



SAR TEST REPORT

For

Hunan GM Innovation Technology Co., Ltd

VAXIS LITECOMM

Test Model: L220401

Additional Model No.: L220403, L220404

Prepared for : Hunan GM Innovation Technology Co., Ltd
Address : No 46, Jiefang East Road, Furong District, Changsha, China

Prepared by : Shenzhen LCS Compliance Testing Laboratory Ltd.
Address : 101, 201 Bldg A & 301 Bldg C, Juji Industrial Park
Yabianxueziwei, Shajing Street, Baoan District, Shenzhen,
518000, China
Tel : (86)755-82591330
Fax : (86)755-82591332
Web : www.LCS-cert.com
Mail : webmaster@LCS-cert.com

Date of receipt of test sample : July 13, 2023
Number of tested samples : 1
Sample No. : A071023120-1
Serial number : Prototype
Date of Test : July 13, 2023~July 13, 2023
Date of Report : September 07, 2023



Shenzhen LCS Compliance Testing Laboratory Ltd.

Add: 101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Yabianxueziwei, Shajing Street, Baoan District, Shenzhen, 518000, China

Tel: +(86) 0755-82591330 | E-mail: webmaster@lcs-cert.com | Web: www.lcs-cert.com

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**SAR TEST REPORT****Report Reference No.: LCSA071023120EB****Date Of Issue: September 07, 2023****Testing Laboratory Name: Shenzhen LCS Compliance Testing Laboratory Ltd.****Address: 101, 201 Bldg A & 301 Bldg C, Juji Industrial Park
Yabianxueziwei, Shajing Street, Baoan District, Shenzhen,
518000, China****Testing Location/ Procedure: Full application of Harmonised standards ☒
Partial application of Harmonised standards ☐
Other standard testing method ☐****Applicant's Name.....: Hunan GM Innovation Technology Co., Ltd****Address: No 46, Jiefang East Road, Furong District, Changsha, China****Test Specification:****Standard: IEEE Std C95.1, 2019/IEC-IEEE 62209-1528-2020
/FCC Part 2.1093****Test Report Form No.: LCSEMC-1.0****TRF Originator: Shenzhen LCS Compliance Testing Laboratory Ltd.****Master TRF: Dated 2011-03****Shenzhen LCS Compliance Testing Laboratory Ltd. All rights reserved.**

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Test Item Description.: VAXIS LITECOMM**Trade Mark: VAXIS****Model/Type Reference: L220401****Ratings: Input: DC 5V
DC 3.85V by Rechargeable Li-ion Battery, 1800mAh****Result: Positive****Compiled by:**

Jay Zhan/ File administrators

Supervised by:

Cary Luo/ Technique principal

Approved by:

Gavin Liang/ Manager



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SAR -- TEST REPORT

Test Report No. : LCSA071023120EBSeptember 07, 2023
Date of issue

Type / Model.....	: L220401
EUT.....	: VAXIS LITECOMM
Applicant.....	: Hunan GM Innovation Technology Co., Ltd
Address.....	: No 46, Jiefang East Road, Furong District, Changsha, China
Telephone.....	: /
Fax.....	: /
Manufacturer.....	: CRYSTAL VIDEO TECHNOLOGY CO., LTD
Address.....	: 3rd Floor, Bldg. 23, Changxing Technology Park, Shayi Community, Shajing Street, Bao'an District, Shenzhen, China.(R&D Center set on 3rd Floor, Bldg. F12, F518 Idea Land)
Telephone.....	: /
Fax.....	: /
Factory.....	: CRYSTAL VIDEO TECHNOLOGY CO., LTD
Address.....	: 3rd Floor, Bldg. 23, Changxing Technology Park, Shayi Community, Shajing Street, Bao'an District, Shenzhen, China.(R&D Center set on 3rd Floor, Bldg. F12, F518 Idea Land)
Telephone.....	: /
Fax.....	: /
Test Result	Positive

The test report merely corresponds to the test sample.

It is not permitted to copy extracts of these test result without the written permission of the test laboratory.



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Revision History

Revision	Issue Date	Revision Content	Revised By
000	September 07, 2023	Initial Issue	--





TABLE OF CONTENTS

1. TEST STANDARDS AND TEST DESCRIPTION.....	6
1.1. TEST STANDARDS	6
1.2. TEST DESCRIPTION	6
1.3. GENERAL REMARKS	6
1.4. PRODUCT DESCRIPTION	6
1.5. STATEMENT OF COMPLIANCE	8
2. TEST ENVIRONMENT	9
2.1. TEST FACILITY	9
2.2. ENVIRONMENTAL CONDITIONS	9
2.3. SAR LIMITS	9
2.4. EQUIPMENTS USED DURING THE TEST	10
3. SAR MEASUREMENTS SYSTEM CONFIGURATION	11
3.1. SAR MEASUREMENT SET-UP	11
3.2. OPENSAR E-FIELD PROBE SYSTEM.....	12
3.3. PHANTOMS.....	13
3.4. DEVICE HOLDER	13
3.5. SCANNING PROCEDURE	14
3.6. DATA STORAGE AND EVALUATION.....	16
3.7. POSITION OF THE WIRELESS DEVICE IN RELATION TO THE PHANTOM.....	17
3.8. TISSUE DIELECTRIC PARAMETERS FOR HEAD AND BODY PHANTOMS	19
3.9. TISSUE EQUIVALENT LIQUID PROPERTIES	19
3.10. SYSTEM CHECK	20
3.11. SAR MEASUREMENT PROCEDURE	22
3.12. POWER REDUCTION	22
3.13. POWER DRIFT	22
4. TEST CONDITIONS AND RESULTS.....	23
4.1. POWER RESULTS.....	23
4.2. MANUFACTURING TOLERANCE	24
4.3. TRANSMIT ANTENNAS AND SAR MEASUREMENT POSITION.....	25
4.4. SAR MEASUREMENT RESULTS.....	26
4.5. STANDALONE SAR TEST EXCLUSION CONSIDERATIONS AND ESTIMATED SAR.....	27
4.6. SIMULTANEOUS TX SAR CONSIDERATIONS	28
4.7. SAR MEASUREMENT VARIABILITY	28
4.8. MEASUREMENT UNCERTAINTY (450MHz-6GHz).....	29
4.9. SYSTEM CHECK RESULTS	30
4.10. SAR TEST GRAPH RESULTS.....	31
5. CALIBRATION CERTIFICATES	33
5.1 PROBE-EPGO376 CALIBRATION CERTIFICATE.....	33
5.2 SID1900DIPOLE CALIBRATION CERITICATE.....	44
6. SAR SYSTEM PHOTOGRAPHS	55
7. PHOTOGRAPHS OF THE TEST	56
8. EUT PHOTOGRAPHS	57



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1. TEST STANDARDS AND TEST DESCRIPTION

1.1. Test Standards

[IEEE Std C95.1, 2019](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz. It specifies the maximum exposure limit of 1.6 W/kg as averaged over any 1 gram of tissue for portable devices being used within 20 cm of the user in the uncontrolled environment.

[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)

[FCC Part 2.1093](#): Radiofrequency Radiation Exposure Evaluation: Portable Devices

[KDB447498 D01 General RF Exposure Guidance](#): Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

[KDB648474 D04 Handset SAR v01r03](#): SAR Evaluation Considerations for Wireless Handsets

[KDB865664 D01 SAR Measurement 100 MHz to 6 GHz](#): SAR Measurement Requirements for 100 MHz to 6 GHz

[KDB865664 D02 RF Exposure Reporting](#): RF Exposure Compliance Reporting and Documentation Considerations

[KDB643646 D01 SAR Test for PTT Radios v01r03](#): Federal Communications Commission Office of Engineering and Technology Laboratory Division

1.2. Test Description

The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power. And Test device is identical prototype.

1.3. General Remarks

Date of receipt of test sample	:	July 13, 2023
	:	
Testing commenced on	:	July 13, 2023
	:	
Testing concluded on	:	July 13, 2023

1.4. Product Description

The **Hunan GM Innovation Technology Co., Ltd.** 's Model: **L220401** or the "EUT" as referred to in this report; more general information as follows, for more details, refer to the user's manual of the EUT.

General Description	
Product Name:	VAXIS LITECOMM
Model/Type reference:	L220401
Additional Model No.:	L220403, L220404
Model Declaration:	PCB board, structure and internal of these model(s) are the same, So no additional models were tested
Hardware Version:	V7.0
Software Version:	V1.0.22
Power supply:	Input: DC 5V DC 3.85V by Rechargeable Li-ion Battery, 1800mAh
DECT	
Operating Frequency	1921.536~1928.448 MHz
Modulation Type	GFSK
Maximum conducted peak output power	20.34dBm
Antenna Description	Internal Antenna, 2.0dBi(Max.)
Bluetooth	
Frequency Range:	2402MHz ~ 2480MHz
Channel Number:	79 channels for Bluetooth V5.1 (DSS)
Channel Spacing:	1MHz for Bluetooth V5.1 (DSS)
Modulation Type:	GFSK, $\pi/4$ -DQPSK, 8-DPSK for Bluetooth V5.1(DSS)



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Bluetooth Version:	V5.1
Antenna Description:	Internal Antenna, 0.13dBi(Max.)
NFC	
Operating Frequency	13.56MHz
Modulation Type	ASK
Antenna Description	Internal Antenna, 2.0dBi(Max.)

EUT channels and frequencies list:

Channel NO.	Frequency(MHz)
1	1921.536
2	1923.264
3	1924.992
4	1926.720
5	1928.448





1.5. Statement of Compliance

The maximum of results of SAR found during testing for L220401 are follows:

<Highest Reported standalone SAR Summary>

Frequency Band(MHz)	Highest Reported(W/Kg)	
	Front (with 0mm separation)	Rear (with 0mm separation)
1921.536~1928.448	0.011	0.036

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2019, and had been tested in accordance with the measurement methods and procedures specified in IEC-IEEE 62209-1528-2020.

<Highest Reported simultaneous SAR Summary>

Exposure Position	Frequency Band	Body (Report SAR _{1-g} (W/kg)	Highest Reported Simultaneous Transmission SAR _{1-g} (W/kg)
Body	DECT	0.036	0.08303
	NFC	0.047	
	BT	0.00003	





2.TEST ENVIRONMENT

2.1. Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

Site Description
SAR Lab. : NVLAP Accreditation Code is 600167-0.
FCC Designation Number is CN5024.
CAB identifier is CN0071.
CNAS Registration Number is L4595.
FCC Test Firm Registration Number: 254912

2.2. Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

Temperature:	18-25 °C
Humidity:	40-65 %
Atmospheric pressure:	950-1050mbar

2.3. SAR Limits

EXPOSURE LIMITS	FCC Limit (1g Tissue)	
	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average(averaged over the whole body)	0.08	0.4
Spatial Peak(averaged over any 1 g of tissue)	1.6	8.0
Spatial Peak(hands/wrists/ feet/anklesaveraged over 10 g)	4.0	20.0

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.
Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).





2.4. Equipments Used during the Test

Item	Equipment	Manufacturer	Model No.	Serial No.	Cal Date	Due Date
1	PC	Lenovo	G5005	MY42081102	N/A	N/A
2	SAR Measurement system	SATIMO	4014_01	SAR_4014_01	N/A	N/A
3	Signal Generator	Agilent	E4438C	MY49072627	2023-06-09	2024-06-08
4	S-parameter Network Analyzer	Agilent	8753ES	US38432944	2023-06-09	2024-06-08
5	Wideband Radio Communication Tester	R&S	CMW500	103818-1	2022-10-29	2023-10-28
6	E-Field PROBE	MVG	SSE2	SN 25/22 EPGO376	2023-06-22	2024-06-21
7	DIPOLE 1900	SATIMO	SID 1900	SN 38/18 DIP 1G900-466	2021-09-22	2024-09-21
8	COMOSAR OPENCoaxial Probe	SATIMO	OCPG 68	SN 40/14 OCPG68	2022-10-29	2023-10-28
9	Communication Antenna	SATIMO	ANTA57	SN 39/14 ANTA57	2022-10-29	2023-10-28
10	FEATURE PHONEPOSITIONING DEVICE	SATIMO	MSH98	SN 40/14 MSH98	N/A	N/A
11	DUMMY PROBE	SATIMO	DP60	SN 03/14 DP60	N/A	N/A
12	SAM PHANTOM	SATIMO	SAM117	SN 40/14 SAM117	N/A	N/A
13	Liquid measurement Kit	HP	85033D	3423A03482	N/A	N/A
14	Power meter	Agilent	E4419B	MY45104493	2022-10-29	2023-10-28
15	Power meter	Agilent	E4419B	MY45100308	2022-10-29	2023-10-28
16	Power sensor	Agilent	E9301H	MY41495616	2022-10-29	2023-10-28
17	Power sensor	Agilent	E9301H	MY41495234	2022-10-29	2023-10-28
18	Directional Coupler	MCLI/USA	4426-20	03746	2023-06-09	2024-06-08

Note:

- 1) Per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three year extended calibration interval. Each measured dipole is expected to evaluate with following criteria at least on annual interval.
 - a) There is no physical damage on the dipole;
 - b) System check with specific dipole is within 10% of calibrated values;
 - c) The most recent return-loss results,measured at least annually,deviates by no more than 20% from the previous measurement;
 - d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.
- 2) Network analyzer probe calibration against air, distilled water and a shorting black performed before measuring liquid parameters.



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3.SAR MEASUREMENTS SYSTEM CONFIGURATION

3.1. SAR Measurement Set-up

The OPENSAR system for performing compliance tests consist of the following items:

A standard high precision 6-axis robot (KUKA) with controller and software.

KUKA Control Panel (KCP)

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with a Video Positioning System(VPS).

The stress sensor is composed with mechanical and electronic when the electronic part detects a change on the electro-mechanical switch,It sends an “Emergency signal” to the robot controller that to stop robot’s moves

A computer operating Windows XP.

OPENSAR software

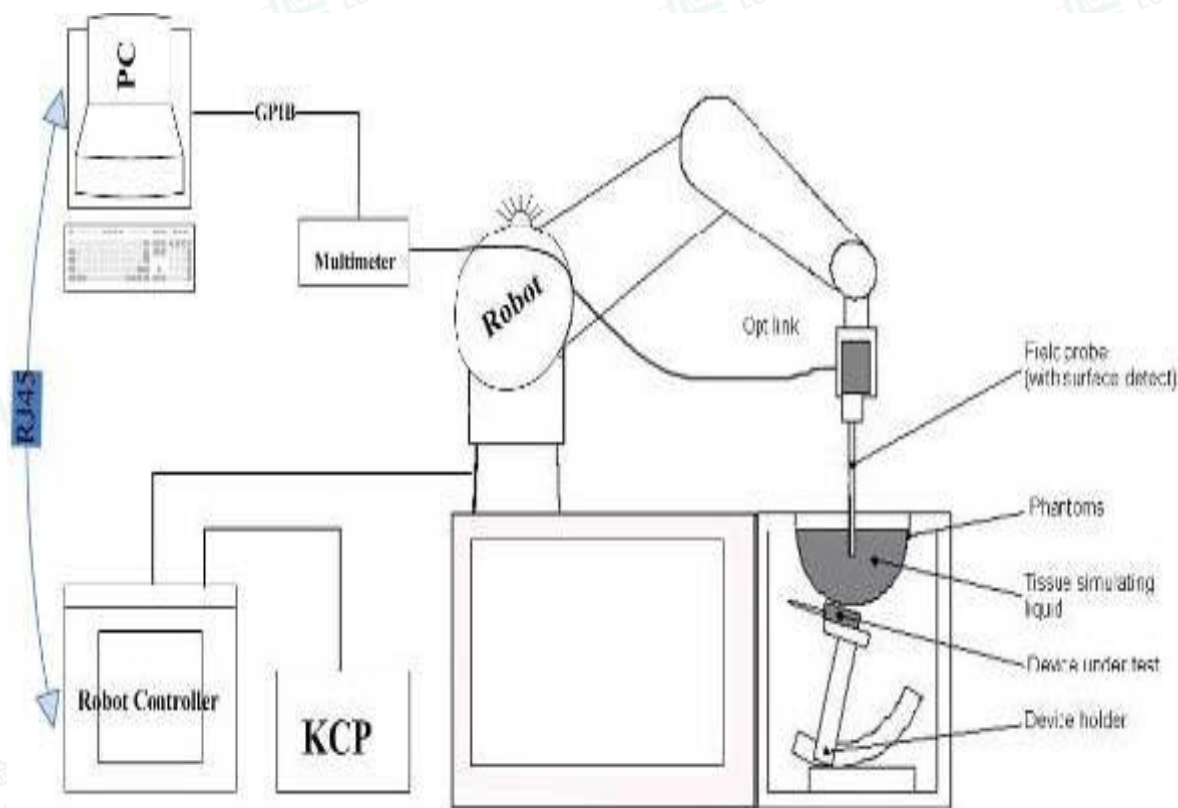
Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.

The SAM phantom enabling testing left-hand right-hand and body usage.

The Position device for handheld EUT

Tissue simulating liquid mixed according to the given recipes .

System validation dipoles to validate the proper functioning of the system.





3.2. OPENSAR E-field Probe System

The SAR measurements were conducted with the dosimetric probe EPG0376(manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

Probe Specification

ConstructionSymmetrical design with triangular core
Interleaved sensors
Built-in shielding against static charges
PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

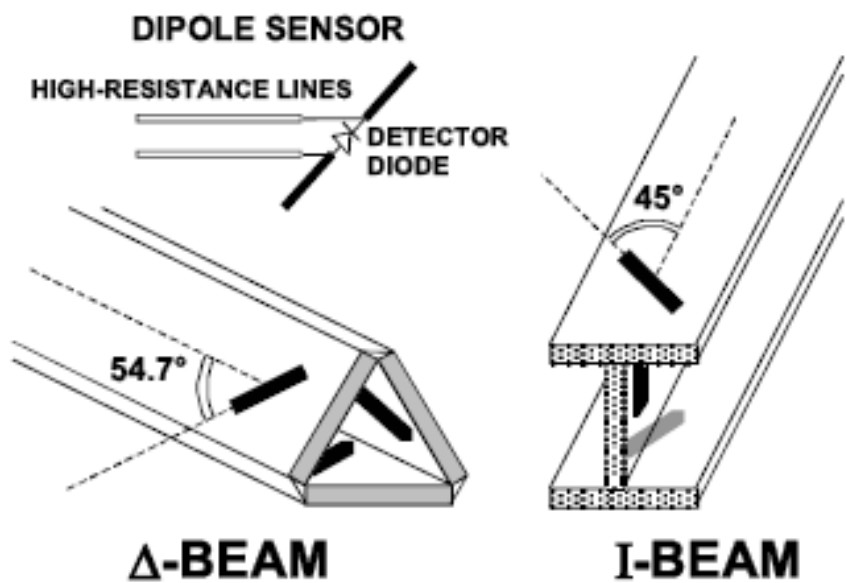
CalibrationISO/IEC 17025 calibration service available.

Frequency	450 MHz to 6 GHz; Linearity:0.25dB(450 MHz to 6 GHz)
Directivity	0.25 dB in HSL (rotation around probe axis) 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	0.01W/kg to > 100 W/kg; Linearity: 0.25 dB
Dimensions	Overall length: 330 mm (Tip: 16mm) Tip diameter: 5 mm (Body: 8 mm) Distance from probe tip to sensor centers: 2.5 mm
Application	General dosimetry up to 6 GHz Dosimetry in strong gradient fields Compliance tests of Mobile Phones

Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

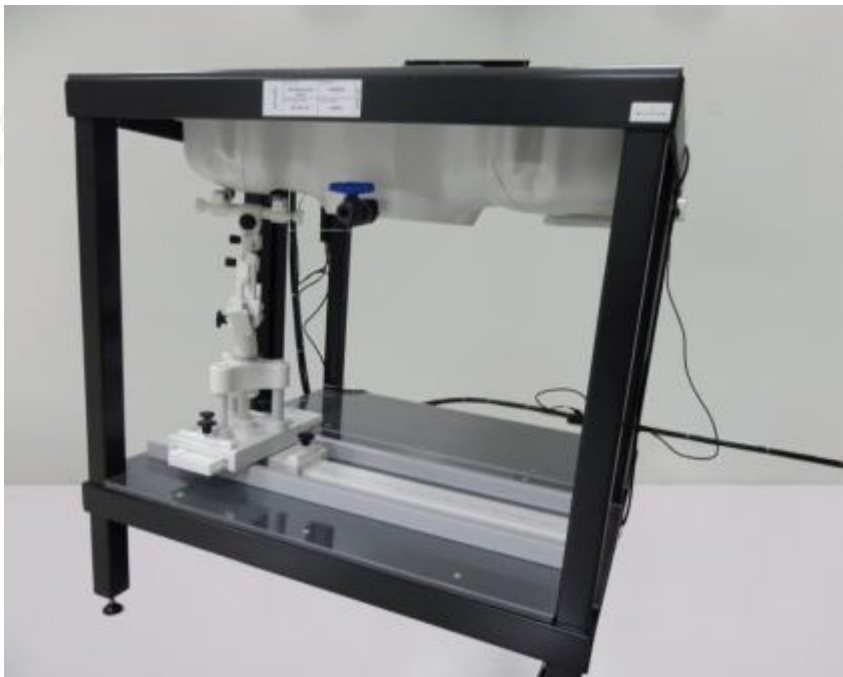
The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



3.3. Phantoms

The SAM Phantom SAM117 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN62209-1, EN62209-2:2010. The phantom enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot.

System checking was performed using the flat section, whilst Head SAR tests used the left and right head profile sections. Body SAR testing also used the flat section between the head profiles.



SAM Twin Phantom

3.4. Device Holder

In combination with the Generic Twin Phantom SAM117, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).



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Device holder supplied by SATIMO

3.5. Scanning Procedure

The procedure for assessing the peak spatial-average SAR value consists of the following steps

Power Reference Measurement

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values before running a detailed measurement around the hot spot. Before starting the area scan a grid spacing of 15 mm x 15 mm is set. During the scan the distance of the probe to the phantom remains unchanged. After finishing area scan, the field maxima within a range of 2 dB will be ascertained.

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

Zoom Scan

Zoom Scans are used to estimate the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default Zoom Scan is done by 7x7x7 points within a cube whose base is centered around the maxima found in the preceding area scan.





Maximum zoom scan spatial resolution: $\Delta x_{Zoom}, \Delta y_{Zoom}$			$\leq 2\text{ GHz}: \leq 8\text{ mm}$ $2 - 3\text{ GHz}: \leq 5\text{ mm}^*$	$3 - 4\text{ GHz}: \leq 5\text{ mm}^*$ $4 - 6\text{ GHz}: \leq 4\text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		$\leq 5\text{ mm}$	$3 - 4\text{ GHz}: \leq 4\text{ mm}$ $4 - 5\text{ GHz}: \leq 3\text{ mm}$ $5 - 6\text{ GHz}: \leq 2\text{ mm}$
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	$\leq 4\text{ mm}$	$3 - 4\text{ GHz}: \leq 3\text{ mm}$ $4 - 5\text{ GHz}: \leq 2.5\text{ mm}$ $5 - 6\text{ GHz}: \leq 2\text{ mm}$
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)\text{ mm}$	
Minimum zoom scan volume	x, y, z		$\geq 30\text{ mm}$	$3 - 4\text{ GHz}: \geq 28\text{ mm}$ $4 - 5\text{ GHz}: \geq 25\text{ mm}$ $5 - 6\text{ GHz}: \geq 22\text{ mm}$
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB Publication 447498 is $\leq 1.4\text{ W/kg}$, $\leq 8\text{ mm}$, $\leq 7\text{ mm}$ and $\leq 5\text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				





Power Drift measurement

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have OPENSAR software stop the measurements if this limit is exceeded.

3.6. Data Storage and Evaluation

Data Storage

The OPENSAR software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

Data Evaluation

The OPENSAR software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters: - Sensitivity Normi, ai0, ai1, ai2
- Conversion factor ConvFi
- Diode compression point Dcpi

Device parameters: - Frequency f
- Crest factor cf

Media parameters: - Conductivity σ
- Density ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the OPENSAR components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

With V_i = compensated signal of channel i (i = x, y, z)

U_i = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field

dcp_i = diode compression point

From the compensated input signals the primary field data for each channel can be evaluated:

$$E - \text{fieldprobes : } E_i = \sqrt{\frac{V_i}{\text{Norm}_i \cdot \text{ConvF}}}$$

$$H - \text{fieldprobes : } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

With V_i = compensated signal of channel i (i = x, y, z)

Normi = sensor sensitivity of channel i (i = x, y, z)

[mV/(V/m)²] for E-field Probes

ConvF = sensitivity enhancement in solution



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- a_{ij} = sensor sensitivity factors for H-field probes
 f = carrier frequency [GHz]
 E_i = electric field strength of channel i in V/m
 H_i = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

- with SAR = local specific absorption rate in mW/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

3.7. Position of the wireless device in relation to the phantom

General considerations

This standard specifies two handset test positions against the head phantom – the “cheek” position and the “tilt” position.

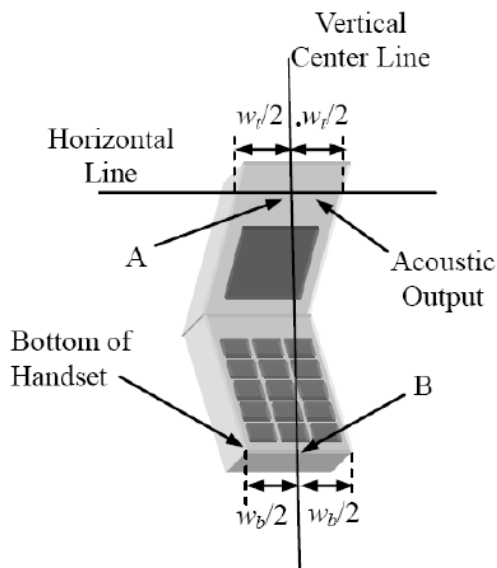
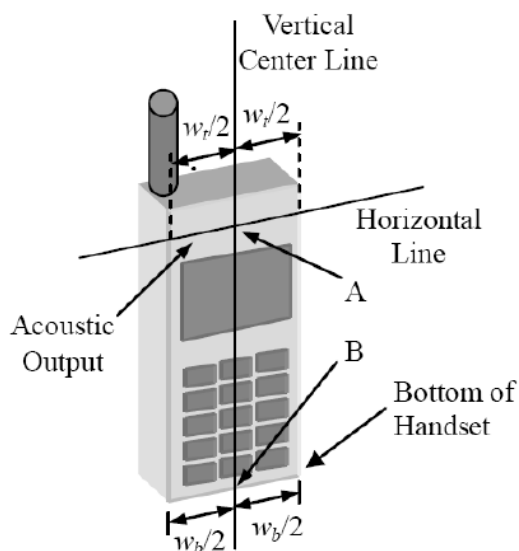
The power flow density is calculated assuming the excitation field as a free space field

$$P_{(pwe)} = \frac{E_{tot}^2}{3770} \text{ or } P_{(pwe)} = H_{tot}^2 \cdot 37.7$$

Where P_{pwe} = Equivalent power density of a plane wave in mW/cm²

E_{tot} = total electric field strength in V/m

H_{tot} = total magnetic field strength in A/m



W_t Width of the handset at the level of the acoustic

W_b Width of the bottom of the handset

A Midpoint of the width w_t of the handset at the level of the acoustic output

B Midpoint of the width w_b of the bottom of the handset

Picture 1-a Typical “fixed” case handset Picture 1-b Typical “clam-shell” case handset

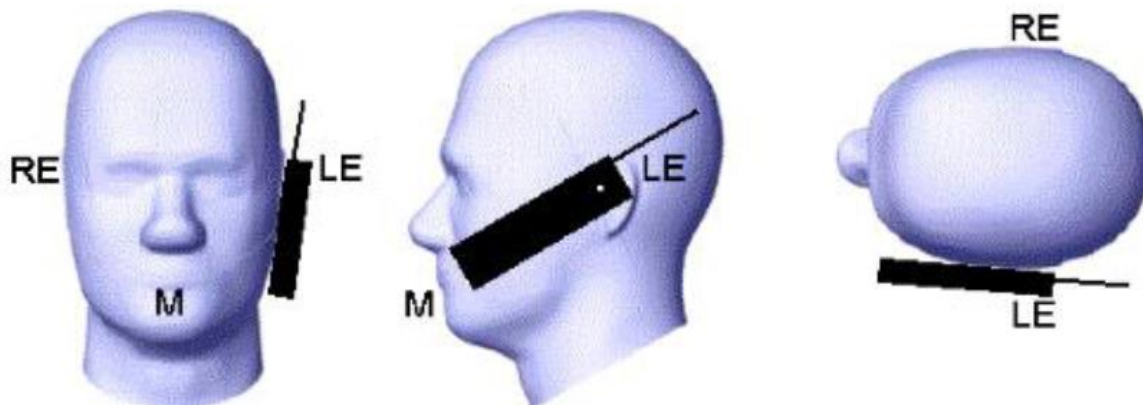


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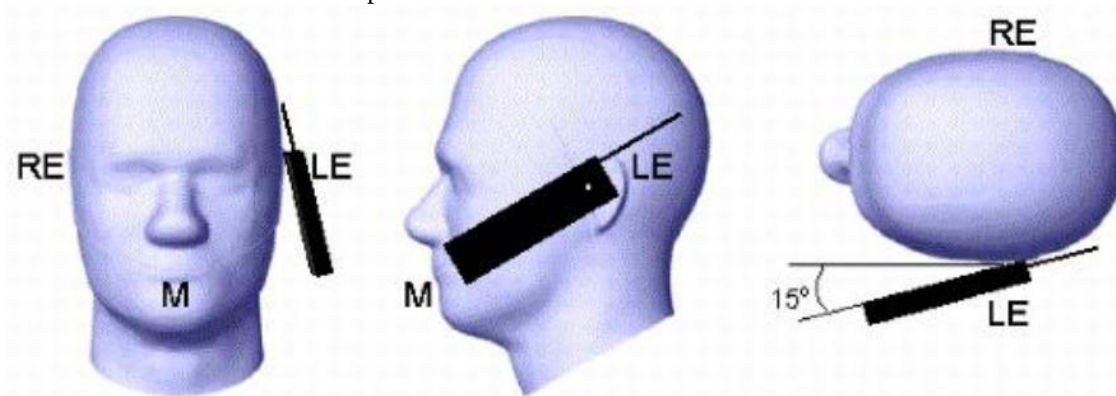
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Picture 2 Cheek position of the wireless device on the left side of SAM



Picture 3 Tilt position of the wireless device on the left side of SAM

For body SAR test we applied to FCC KDB941225, KDB447498, KDB248227, KDB648654;



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3.8. Tissue Dielectric Parameters for Head and Body Phantoms

The liquid is consisted of water,salt,Glycol,Sugar,Preventol and Cellulose.The liquid has previously been proven to be suited for worst-case.It's satisfying the latest tissue dielectric parameters requirements proposed by the KDB865664.

The composition of the tissue simulating liquid

Ingredient (% Weight)	750MHz		835MHz		1800 MHz		1900 MHz		2450MHz		2600MHz		5000MHz	
	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	39.28	51.3	41.45	52.5	54.5	40.2	54.9	40.4	62.7	73.2	60.3	71.4	65.5	78.6
Preventol	0.10	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HEC	1.00	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DGBE	0.00	0.00	0.00	0.00	45.33	59.31	44.92	59.10	36.80	26.70	39.10	28.40	0.00	0.00
Triton X-100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17.2	10.7

Target Frequency (MHz)	Head	
	ϵ_r	$\sigma(S/m)$
750	41.9	0.89
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1640	40.2	1.31
1800	40.0	1.40
1900	40.0	1.40
2000	40.0	1.40
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40
5200	36.0	4.66
5800	35.3	5.27

3.9. Tissue equivalent liquid properties

Dielectric Performance of Head Tissue Simulating Liquid

Test Engineer: bob.yang									
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue				Liquid Temp.	Test Data
		σ	ϵ_r	σ	Dev.	ϵ_r	Dev.		
1900H	1900	1.40	40.00	1.36	-2.86%	41.00	2.50%	22.2	07/13/2023

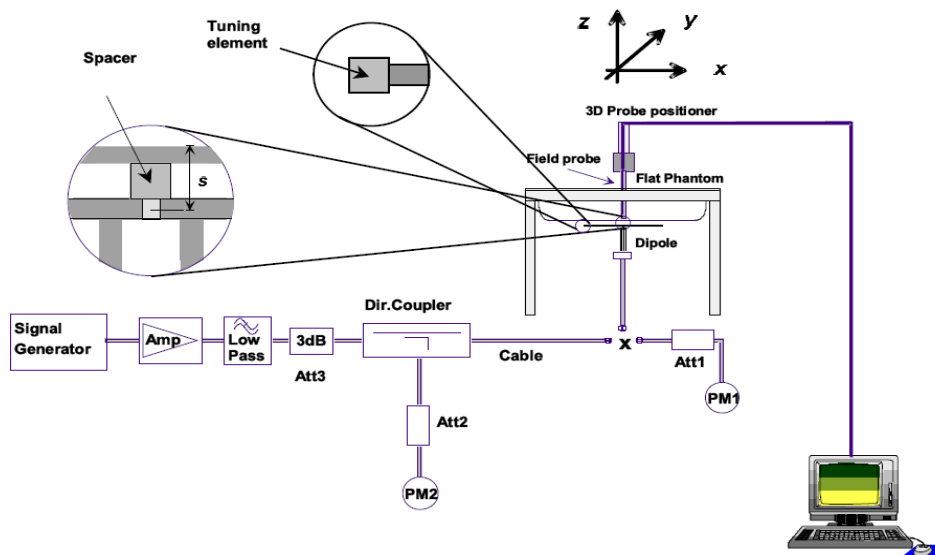




3.10. System Check

The purpose of the system check is to verify that the system operates within its specifications at the device test frequency. The system check is simple check of repeatability to make sure that the system works correctly at the time of the compliance test;

System check results have to be equal or near the values determined during dipole calibration with the relevant liquids and test system ($\pm 10\%$).



The output power on dipole port must be calibrated to 20 dBm (100mW) before dipole is connected.



Photo of Dipole Setup



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Justification for Extended SAR Dipole Calibrations

Referring to KDB 865664D01V01r04, if dipoles are verified in return loss (<-20dB, within 20% of prior calibration), and in impedance (within 5 ohm of prior calibration), the annual calibration is not necessary and the calibration interval can be extended. While calibration intervals not exceed 3 years.

SID1900 SN 38/18 DIP 1G900-466 Extend Dipole Calibrations

Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (ohm)	Delta (ohm)
2021-09-22	-26.43		50.5		4.7	
2022-09-22	-26.33	-0.38	50.2	-0.3	4.5	-0.2

Mixture Type	Frequency (MHz)	Power	SAR1g (W/Kg)	SAR10g (W/Kg)	Drift (%)	1W Target		Difference percentage		Liquid Temp	Date
						SAR1g (W/Kg)	SAR10g (W/Kg)	1g	10g		
Head	1900	100 mW	3.963	2.082	3.25	40.03	20.55	-1.00%	1.31%	22.2	07/13/2023
		Normalize to 1 Watt	39.63	20.82							

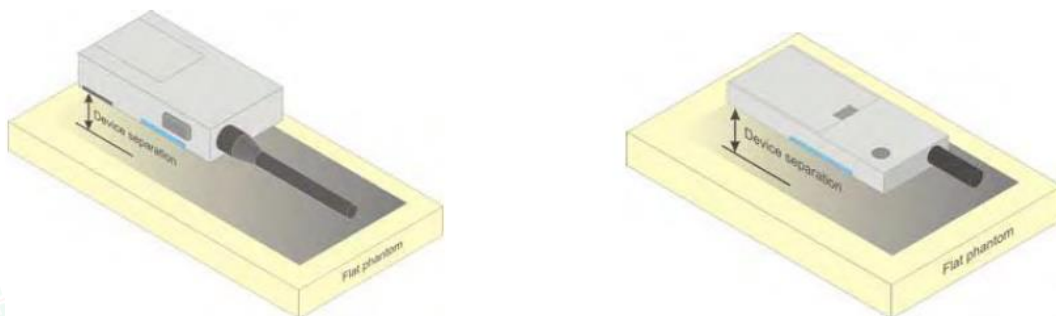


3.11. SAR measurement procedure

The measurement procedures are as follows:

Front-of-face device

A typical example of a front-of-face device is a two-way radio that is held at a distance from the face of the user when transmitting. In these cases the device under test shall be positioned at the distance to the phantom surface that corresponds to the intended use as specified by the manufacturer in the user instructions (Figure 8a). If the intended use is not specified, a separation distance of 25 mm between the phantom surface and the device shall be used.



a) Two-way radios

3.12. Power Reduction

The product without any power reduction.

3.13. Power Drift

To control the output power stability during the SAR test, SAR system calculates the power drift by measuring the E-field at the same location at the beginning and at the end of the measurement for each test position. This ensures that the power drift during one measurement is within 5%.



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4. TEST CONDITIONS AND RESULTS

4.1. Power Results

According KDB 447498D01 General RF Exposure Guidance v06 Section 4.1 2) states that “Unless it is specified differently in the published RF exposure KDB procedures, these requirements also apply to test reduction and test exclusion considerations. Time-averaged maximum conducted output power applies to SAR and, as required by § 2.1091(c), time-averaged ERP applies to MPE. When an antenna port is not available on the device to support conducted power measurement, such as FRS and certain Part 15 transmitters with built-in integral antennas, the maximum output power allowed for production units should be used to determine RF exposure test exclusion and compliance.”

< Power Measurement >

Frequency (MHz)	Conducted AVG output power (dBm)
1921.536	10.00
1924.992	9.96
1928.448	9.63

<BT Power Measurement >

Mode	channel	Frequency (MHz)	Conducted AVG output power (dBm)
GFSK	0	2402	0.12
	39	2441	0.30
	78	2480	0.32
$\pi/4$ -DQPSK	0	2402	-0.15
	39	2441	0.11
	78	2480	0.07
8DPSK	0	2402	0.01
	39	2441	0.21
	78	2480	0.24

Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

Bluetooth Turn up Power (dBm)	Separation Distance (mm)	Frequency (GHz)	Exclusion Thresholds
0.5	5	2.45	0.4

Per KDB 447498 D01v06, when the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion. The test exclusion threshold is $0.4 < 3.0$, SAR testing is not required.

Test Mode	Channel Frequency (MHz)	Field Strength (dBuV/m@3m)	Max Output Power(mW)	Calculate on Value(Note)
NFC	13.56	72.64	0.0079	0.0002

Note:

1. Calculate the SAR test to eliminate thresholds from chapter 2 conditions "3" formula
2. Field Strength (dBuV/m@3m) = Field Strength (dBuV/m@30m) + $40 \cdot \log(30/3)$
3. Max Power (dBm) = Field Strength of Fundamental (dBuV/m@3m) - 95.23
4. Max Power (mW) = $10^{(\text{Max power (dBm)} / 10)}$

Since Source-base time average power is below SAR test exclusion power thresholds, the SAR evaluation is not required.



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4.2. Manufacturing tolerance

1921.536~1928.448 MHz	
Target (dBm)	9.0
Tolerance $\pm$ (dB)	1.0

Bluetooth V5.1

GFSK (Average)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-0.5	-0.5	-0.5
Tolerance $\pm$ (dB)	1.0	1.0	1.0
$\pi/4$ DQPSK (Average)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-1.0	-0.5	-0.5
Tolerance $\pm$ (dB)	1.0	1.0	1.0
8DPSK (Average)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-0.5	-0.5	-0.5
Tolerance $\pm$ (dB)	1.0	1.0	1.0

NFC

ASK (Average)			
Channel	X axis	Y axis	Z axis
Target (dBm)	-22.0	-22.0	-22.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0



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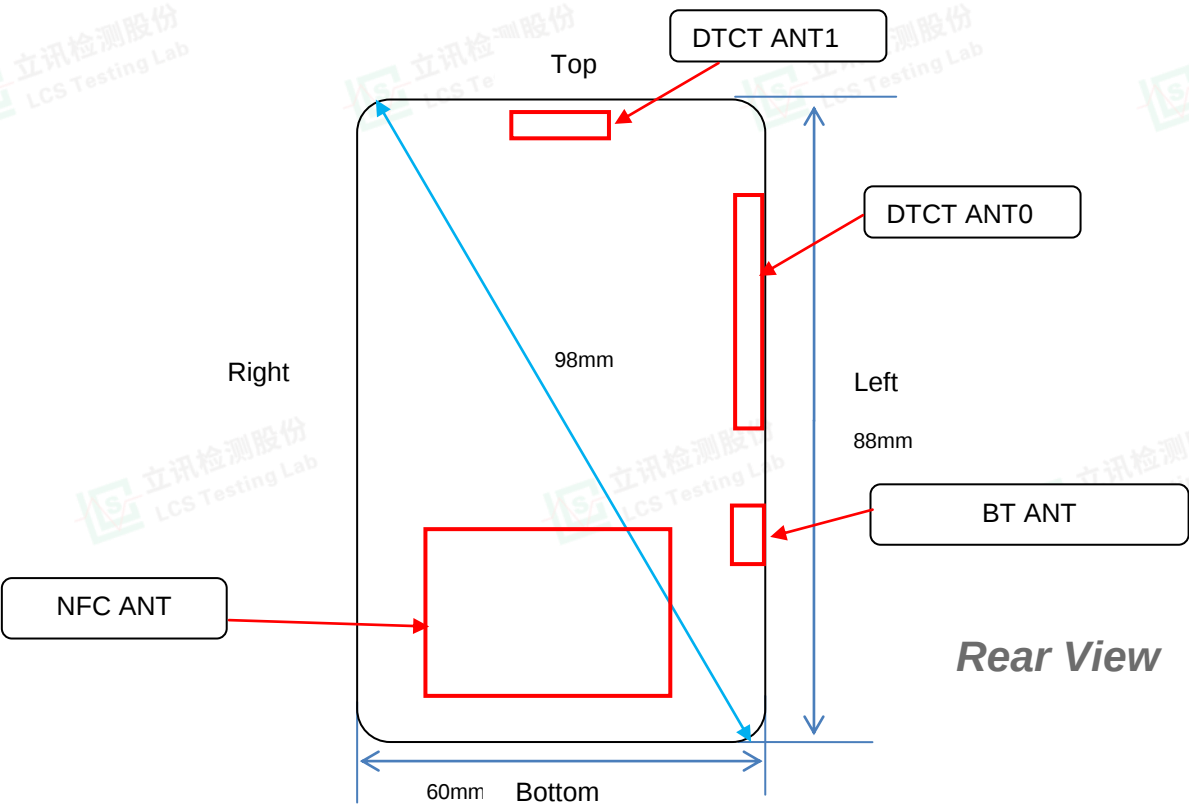
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4.3. Transmit Antennas and SAR Measurement Position



Antenna information:

DTCT Antenna	TX/RX
BT Antenna	TX/RX

Note:

- 1). Per KDB648474 D04, because the overall diagonal distance of this devices is 98mm<160mm, it is considered as “Front-of-face “ device.
- 2). Per KDB648474 D04, 10-g extremity SAR is not required when Body-Worn mode 1-g reported SAR < 1.2 W/kg.





4.4. SAR Measurement Results

The calculated SAR is obtained by the following formula:

$$\text{Reported SAR} = \text{Measured SAR} * 10^{(P_{\text{target}} - P_{\text{measured}})/10}$$

$$\text{Scaling factor} = 10^{(P_{\text{target}} - P_{\text{measured}})/10}$$

$$\text{Reported SAR} = \text{Measured SAR} * \text{Scaling factor}$$

Where

P_{target} is the power of manufacturing upper limit;

P_{measured} is the measured power;

Measured SAR is measured SAR at measured power which including power drift)

Reported SAR which including Power Drift and Scaling factor

Duty Cycle

Test Mode	Duty Cycle
FM	1:1

4.4.1 SAR Results

SAR Values

Freq. (MHz)	Test Position	Conducted Power (dBm)	Maximum Allowed Power (dBm)	Power Drift (%)	Scaling Factor	SAR _{1-g} results(W/kg)			Graph Results
						SAR 1g with 100% duty Cycle(w/kg)	SAR 1g with 10% duty Cycle(w/kg)	Reported	
measured / reported SAR numbers									
VAXIS LITECOMM ANT0									
1921.536	Front	10.00	10.00	0.73	1.000	0.108	0.011	0.011	Plot 1
1924.992	Front	9.96	10.00	-3.65	1.009	0.101	0.010	0.010	
1928.448	Front	9.63	10.00	0.20	1.089	0.096	0.010	0.011	
1921.536	Rear	10.00	10.00	-1.86	1.000	0.364	0.036	0.036	Plot 2
1924.992	Rear	9.96	10.00	-4.85	1.009	0.352	0.035	0.035	
1928.448	Rear	9.63	10.00	3.06	1.089	0.330	0.033	0.036	
VAXIS LITECOMM ANT1									
1921.536	Front	10.00	10.00	0.73	1.000	0.104	0.010	0.010	
1924.992	Front	9.96	10.00	-3.65	1.009	0.096	0.010	0.010	
1928.448	Front	9.63	10.00	0.20	1.089	0.092	0.009	0.010	
1921.536	Rear	10.00	10.00	-1.86	1.000	0.359	0.036	0.036	
1924.992	Rear	9.96	10.00	-4.85	1.009	0.349	0.035	0.035	
1928.448	Rear	9.63	10.00	3.06	1.089	0.324	0.032	0.035	

Remark:

1. The value with black color is the maximum SAR Value of each test band.

2. Per FCC KDB Publication 447498 D01, if the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is optional for such test configuration(s).

3. DC=Transmission mode duty cycle in % where applicable 10% duty cycle is applied for operation For conservative results, the following are applied:



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4.5. Standalone SAR Test Exclusion Considerations and Estimated SAR

Per KDB447498 requires when the standalone SAR test exclusion of section 4.3.1 is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to the following to determine simultaneous transmission SAR test exclusion;

• (max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] • [√ f(GHz)/x] W/kg for test separation distances ≤ 50 mm;

where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.

• 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm

Per FCC KD B447498 D01, simultaneous transmission SAR test exclusion may be applied when the sum of the 1-g SAR for all the transmitting antenna in a specific a physical test configuration is ≤1.6 W/Kg. When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

Ratio=
$$\frac{(SAR_1+SAR_2)^{1.5}}{(\text{peak location separation,mm})} < 0.04$$

Estimated stand alone SAR					
Communication system	Frequency (MHz)	Configuration	Maximum Power (dBm)	Separation Distance (mm)	Estimated SAR _{1-g} (W/kg)
Bluetooth*	2450	Body-worn	0.5	5	0.047
NFC	13.56	Body-worn	-21.0	5	0.00003

Remark:

1. Bluetooth/NFC - Including Lower power Bluetooth/NFC
2. Maximum average power including tune-up tolerance;
3. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion
4. Body as body use distance is 0mm from manufacturer declaration of user manual





4.6. Simultaneous TX SAR Considerations

4.4.1 Introduction

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna. The device has 4 antennas, WWAN main antenna, WWAN diversity antenna(RX only), NFC antenna(RX only) and WiFi/BT antenna supports 2.4Wi-Fi and BT. The 2 TX antennas can always transmit simultaneously. The work mode combination is showed as below table.;

Application Simultaneous Transmission information:

Combination No.	Mode
1	DECT+ BT
2	DECT+ NFC
3	BT+ NFC

4.4.2 Evaluation of Simultaneous SAR

Body Exposure Conditions

Simultaneous transmission SAR for DECT and BT

Test Position	DECT Estimated SAR1-g (W/kg)	BT Estimated SAR1-g (W/kg)	MAX. Σ SAR1-g (W/kg)	SAR1-g Limit (W/kg)	Peak location separation ratio	Simut Meas. Required
Front	0.011	0.047	0.058	1.6	no	no
Rear	0.036	0.047	0.083	1.6	no	no

Simultaneous transmission SAR for DECT and NFC

Test Position	DECT Estimated SAR1-g (W/kg)	NFC Estimated SAR1-g (W/kg)	MAX. Σ SAR1-g (W/kg)	SAR1-g Limit (W/kg)	Peak location separation ratio	Simut Meas. Required
Front	0.054	0.00003	0.05403	1.6	no	no
Rear	0.182	0.00003	0.18203	1.6	no	no

Simultaneous transmission SAR for BT and NFC

Test Position	NFC Estimated SAR1-g (W/kg)	BT Estimated SAR1-g (W/kg)	MAX. Σ SAR1-g (W/kg)	SAR1-g Limit (W/kg)	Peak location separation ratio	Simut Meas. Required
Front	0.00003	0.047	0.04703	1.6	no	no
Rear	0.00003	0.047	0.04703	1.6	no	no

Note:

1. The value with black color is the maximum values of standalone
2. The value with blue color is the maximum values of Σ SAR_{1-g}

4.7. SAR Measurement Variability

According to KDB865664, Repeated measurements are required only when the measured SAR is ≥ 0.80 W/kg. If the measured SAR value of the initial repeated measurement is < 1.45 W/kg with $\leq 20\%$ variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required. The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.19 The repeated measurement results must be clearly identified in the SAR report. All measured SAR, including



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the repeated results, must be considered to determine compliance and for reporting according to KDB 690783. Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

- 1) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 2) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 3) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20

Frequency Band (MHz)	Air Interface	RF Exposure Configuration	Test Position	Repeated SAR (yes/no)	Highest Measured SAR _{1-g} (W/kg)	Reported	First Repeated	
							Measured SAR _{1-g} (W/kg)	Largest to Smallest SAR Ratio
1900	FM	Standalone	Front	Yes	0.108	0.108	n/a	n/a
1900	FM	Standalone	Rear	Yes	0.364	0.364	n/a	n/a

Remark:

- 1. Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not > 1.20 or 3 (1-g or 10-g respectively)

4.8. Measurement Uncertainty (450MHz-6GHz)

Not required as SAR measurement uncertainty analysis is required in SAR reports only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR according to KDB865664D01.





4.9. System Check Results

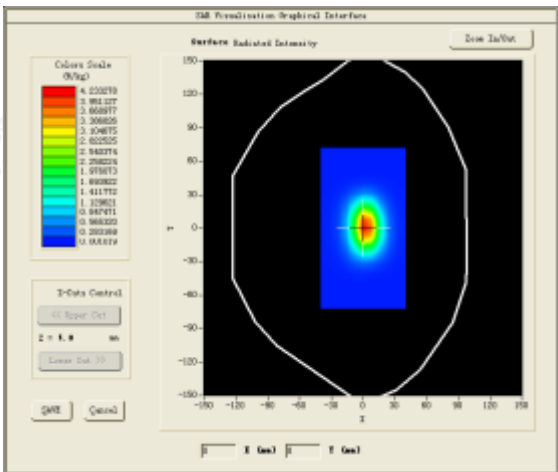
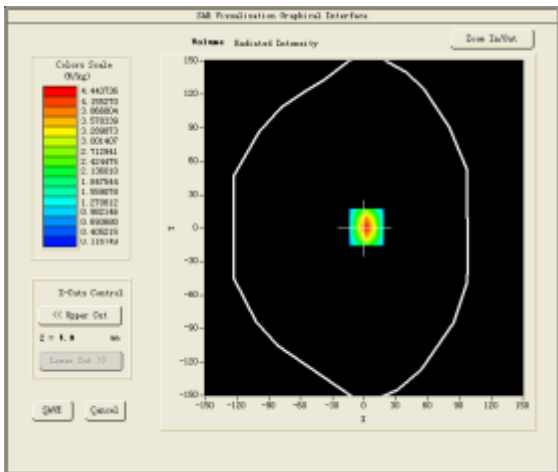
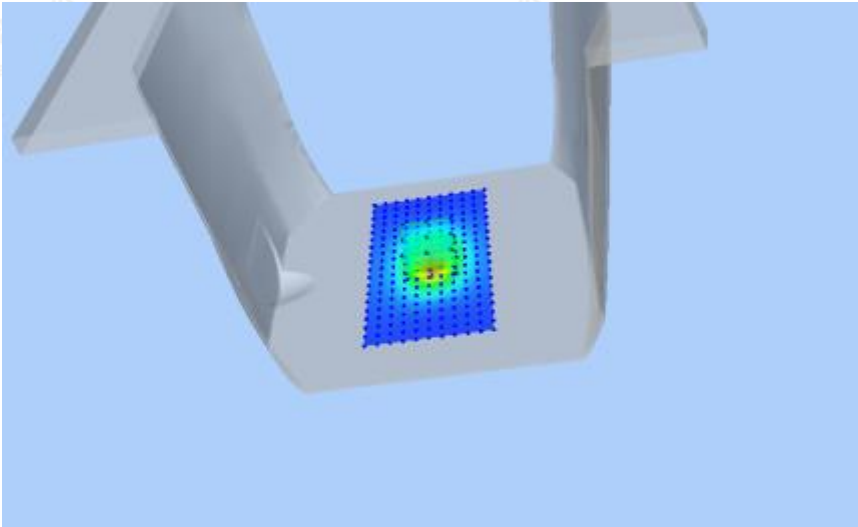
Test mode:1900MHz(Head)

Product Description:Validation

Model:Dipole SID1900

E-Field Probe:SSE2(SN 25/22 EPGO376)

Test Date: July 13, 2023

Medium(liquid type)	HSL_1900
Frequency (MHz)	1900.0000
Relative permittivity (real part)	41.00
Conductivity (S/m)	1.36
Input power	100mW
Crest Factor	1.0
Conversion Factor	2.14
Variation (%)	3.250000
SAR 10g (W/Kg)	2.082260
SAR 1g (W/Kg)	3.963162
SURFACE SAR	VOLUME SAR
	
	



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4.10. SAR Test Graph Results

SAR plots for the highest measured SAR in each exposure configuration, wireless mode and frequency band combination according to FCC KDB 865664 D02;

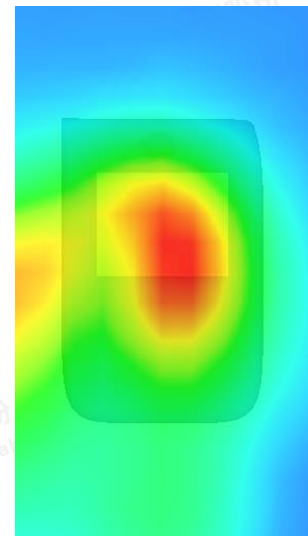
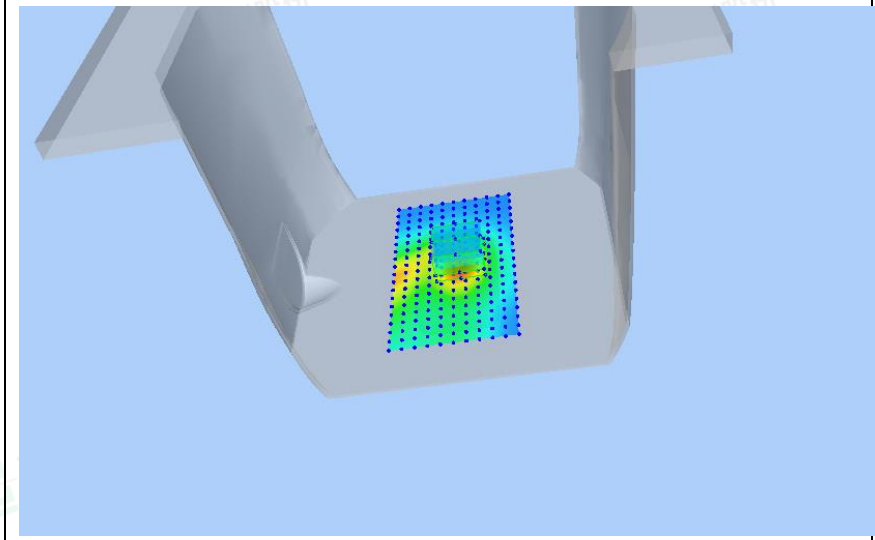
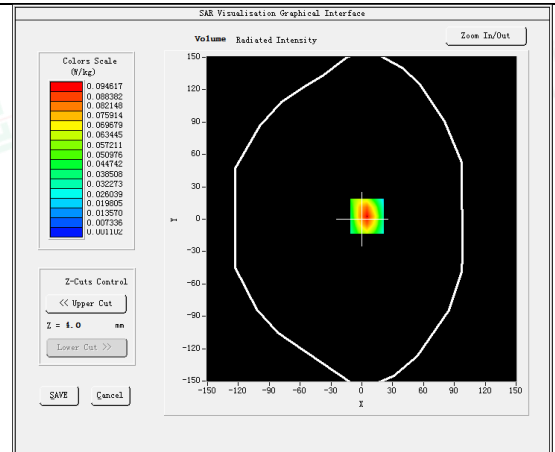
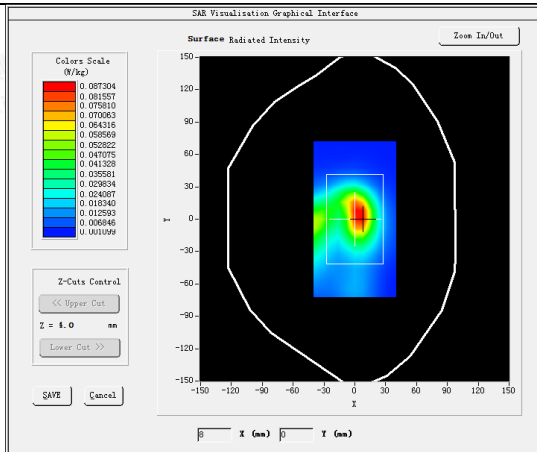
#1 Test Mode: 1921.536~1928.448 MHz, Low channel (Front Side) ANT0

Product Description: VAXIS LITECOMM

Model: L220401

Test Date: July 13, 2023

Medium (liquid type)	HSL_1900
Frequency (MHz)	1921.536
Relative permittivity (real part)	42.21
Conductivity (S/m)	1.34
E-Field Probe	SN 25/22 EPG0376
Crest Factor	2.0
Conversion Factor	2.14
Sensor	4mm
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7, dx=8mm dy=8mm dz=5mm
Variation (%)	0.730000
SAR 10g (W/Kg)	0.043862
SAR 1g (W/Kg)	0.108408
SURFACE SAR	VOLUME SAR



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#2

Test Mode: 1921.536~1928.448 MHz, Low channel(Rear Side) ANT0

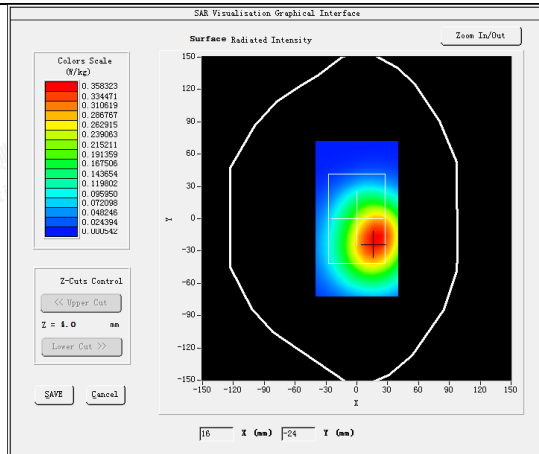
Product Description: VAXIS LITECOMM

Model: L220401

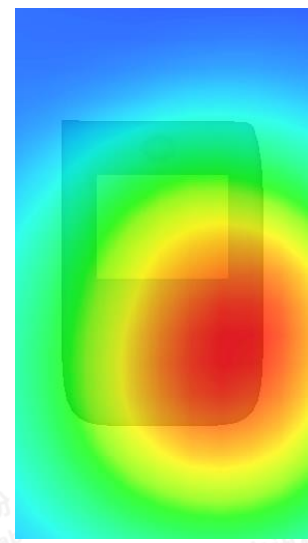
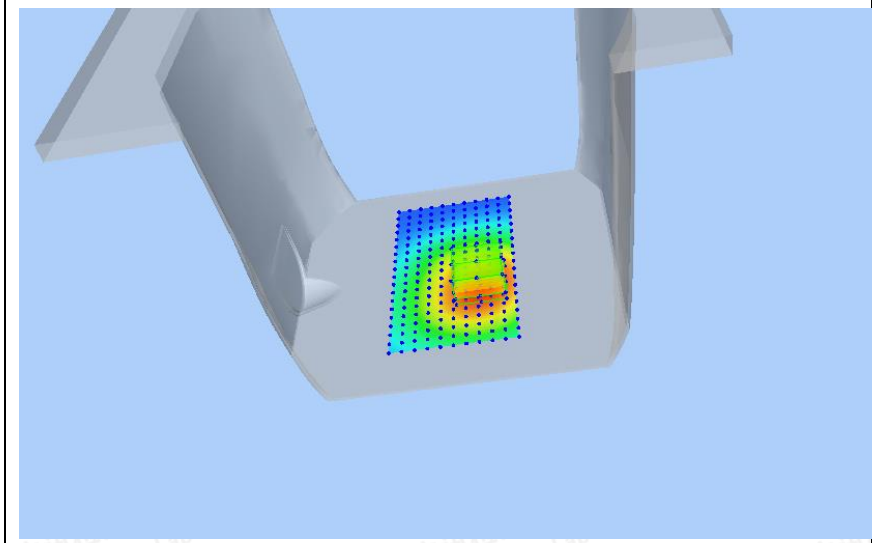
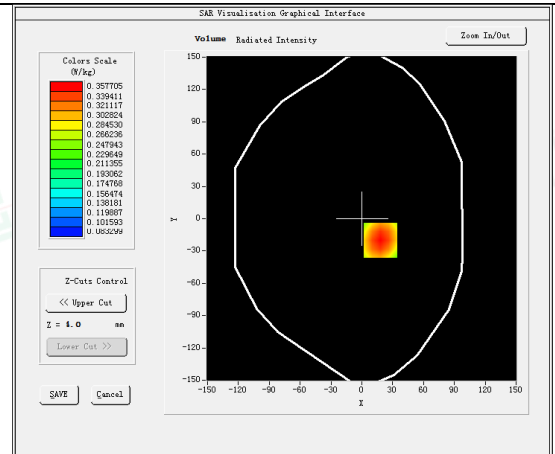
Test Date: July 13, 2023

Medium(liquid type)	HSL_1900
Frequency (MHz)	1921.536
Relative permittivity (real part)	42.21
Conductivity (S/m)	1.34
E-Field Probe	SN 25/22 EPG0376
Crest Factor	2.0
Conversion Factor	2.14
Sensor	4mm
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7, dx=8mm dy=8mm dz=5mm
Variation (%)	-1.860000
SAR 10g (W/Kg)	0.261134
SAR 1g (W/Kg)	0.363773

SURFACE SAR



VOLUME SAR



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5. CALIBRATION CERTIFICATES

5.1 Probe-EPGO376 Calibration Certificate



COMOSAR E-Field Probe Calibration Report

Ref : ACR.180.4.42.BES.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.

**1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN
BLVD**

BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA

MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: SN 25/22 EPGO376

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 06/22/2023



Accreditations #2-6792
Scope available on 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 COMOSAR Dosimetric E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).





COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

	Name	Function	Date	Signature
Prepared by :	Jérôme Le Gall	Measurement Responsible	6/23/2023	
Checked & approved by:	Jérôme Luc	Technical Manager	6/23/2023	
Authorized by:	Yann Toutain	Laboratory Director	6/23/2023	

2023.06.23

13:37:50 +02'03'

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	Name	Date	Modifications
A	Jérôme Le Gall	6/23/2023	Initial release

Page: 2/11

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4 42.BES.A

TABLE OF CONTENTS

1 Device Under Test4

2 Product Description4

2.1 General Information4

3 Measurement Method4

3.1 Linearity4

3.2 Sensitivity4

3.3 Lower Detection Limit5

3.4 Isotropy5

3.1 Boundary Effect5

4 Measurement Uncertainty6

5 Calibration Measurement Results6

5.1 Sensitivity in air6

5.2 Linearity7

5.3 Sensitivity in liquid8

5.4 Isotropy9

6 List of Equipment10





COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	SN 25/22 EPG0376
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-6GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.193 MΩ Dipole 2: R2=0.188 MΩ Dipole 3: R3=0.198 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards.



Figure 1 – MVG COMOSAR Dosimetric E field Probe

Probe Length	330 mm
Length of Individual Dipoles	2 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	2.5 mm
Distance between dipoles / probe extremity	1 mm

3 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

3.1 LINEARITY

The evaluation of the linearity was done in free space using the waveguide, performing a power sweep to cover the SAR range 0.01W/kg to 100W/kg.

3.2 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards.

Page: 4/11

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3.3 LOWER DETECTION LIMIT

The lower detection limit was assessed using the same measurement set up as used for the linearity measurement. The required lower detection limit is 10 mW/kg.

3.4 ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 to 360 degrees in 15-degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis (0°–180°) in 15° increments. At each step the probe is rotated about its axis (0°–360°).

3.1 BOUNDARY EFFECT

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

The boundary effect uncertainty can be estimated according to the following uncertainty approximation formula based on linear and exponential extrapolations between the surface and $d_{be} + d_{step}$ along lines that are approximately normal to the surface:

$$SAR_{uncertainty} [\%] = \Delta SAR_{be} \frac{(d_{be} + d_{step})^2}{2d_{step}} \frac{(e^{-d_{be}/\delta} - e^{-(d_{be} + d_{step})/\delta})}{\delta/2} \quad \text{for } (d_{be} + d_{step}) < 10 \text{ mm}$$

where

$SAR_{uncertainty}$ is the uncertainty in percent of the probe boundary effect

d_{be} is the distance between the surface and the closest *zoom-scan* measurement point, in millimetre

Δ_{step} is the separation distance between the first and second measurement points that are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible

δ is the minimum penetration depth in millimetres of the head tissue-equivalent liquids defined in this standard, i.e., $\delta \approx 14$ mm at 3 GHz;

ΔSAR_{be} in percent of SAR is the deviation between the measured SAR value, at the distance d_{be} from the boundary, and the analytical SAR value.

The measured worst case boundary effect SAR uncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).

Page: 5/11

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4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with an E-field probe calibration using the waveguide technique. All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=2$, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

Uncertainty analysis of the probe calibration in waveguide					
ERROR SOURCES	Uncertainty value (%)	Probability Distribution	Divisor	ci	Standard Uncertainty (%)
Expanded uncertainty 95 % confidence level $k = 2$					14 %

5 CALIBRATION MEASUREMENT RESULTS

Calibration Parameters	
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

5.1 SENSITIVITY IN AIR

Normx dipole 1 ($\mu V/(V/m)^2$)	Normy dipole 2 ($\mu V/(V/m)^2$)	Normz dipole 3 ($\mu V/(V/m)^2$)
0.76	0.78	0.76

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
106	107	108

Calibration curves $e_i=f(V)$ ($i=1,2,3$) allow to obtain E-field value using the formula:

$$E = \sqrt{E_1^2 + E_2^2 + E_3^2}$$

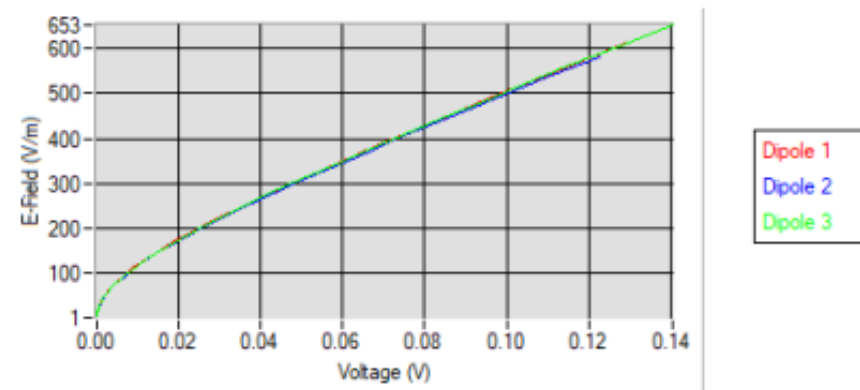




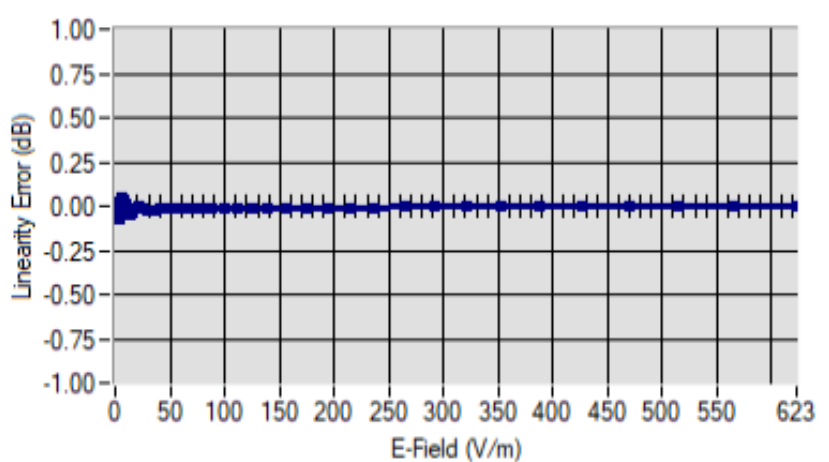
COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

Calibration curves

5.2 LINEARITY

Linearity

Linearity: +/-1.81% (+/-0.08dB)

Page: 7/11

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.442.BES.A

5.3 SENSITIVITY IN LIQUID

Liquid	Frequency (MHz +/- 100MHz)	ConvF
HL450*	450*	1.74*
BL450*	450*	1.67*
HL750	750	1.69
BL750	750	1.73
HL850	835	1.75
BL850	835	1.80
HL900	900	1.87
BL900	900	1.85
HL1800	1800	2.09
BL1800	1800	2.15
HL1900	1900	2.14
BL1900	1900	2.27
HL2000	2000	2.31
BL2000	2000	2.34
HL2300	2300	2.46
BL2300	2300	2.51
HL2450	2450	2.60
BL2450	2450	2.70
HL2600	2600	2.39
BL2600	2600	2.50
HL5200	5200	1.85
BL5200	5200	1.81
HL5400	5400	2.07
BL5400	5400	2.00
HL5600	5600	2.19
BL5600	5600	2.11
HL5800	5800	2.01
BL5800	5800	1.97

* Frequency not cover by COFRAC scope, calibration not accredited

LOWER DETECTION LIMIT: 7mW/kg

Page: 8/11

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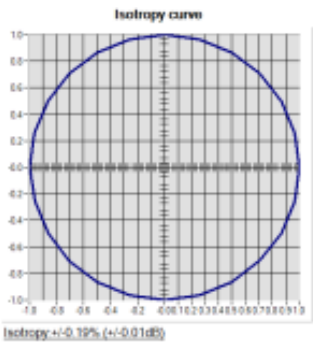


COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

5.4 ISOTROPY

HL1800 MHz





COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

6 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2024
Network Analyzer	Agilent 8753ES	MY40003210	10/2022	10/2025
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Multimeter	Keithley 2000	1160271	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2024
Power Meter	Rohde & Schwarz NRVD	832839-056	11/2022	11/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.180.4.42.BES.A

Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2021	06/2024

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5.2 SID1900Dipole Calibration Certificate



SAR Reference Dipole Calibration Report

Ref : ACR.273.2.18.SATU.A

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BAO'AN BLVD

BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 1900 MHZ

SERIAL NO.: SN 38/18 DIP 1G900-466

Calibrated at MVG US

2105 Barrett Park Dr. - Kennesaw, GA 30144



Calibration Date: 09/22/2021

Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG USA 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.273.2.18.SATU.A

	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	09/28/2021	<i>JS</i>
Checked by :	Jérôme LUC	Product Manager	09/28/2021	<i>JS</i>
Approved by :	Kim RUTKOWSKI	Quality Manager	09/28/2021	<i>Kim Rutkowski</i>

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	Date	Modifications
A	09/28/2021	Initial release

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.2.18.SATU.A

TABLE OF CONTENTS

1	Introduction.....	4
2	Device Under Test	4
3	Product Description	4
3.1	General Information	4
4	Measurement Method	5
4.1	Return Loss Requirements	5
4.2	Mechanical Requirements	5
5	Measurement Uncertainty.....	5
5.1	Return Loss	5
5.2	Dimension Measurement	5
5.3	Validation Measurement	5
6	Calibration Measurement Results	6
6.1	Return Loss and Impedance In Head Liquid	6
6.2	Return Loss and Impedance In Body Liquid	6
6.3	Mechanical Dimensions	6
7	Validation measurement	7
7.1	Head Liquid Measurement	7
7.2	SAR Measurement Result With Head Liquid	8
7.3	Body Liquid Measurement	9
7.4	SAR Measurement Result With Body Liquid	10
8	List of Equipment	11

Page: 3/11

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.2.18.SATU.A

1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, FCC KDBs and CEI/IEC 62209 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 1900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1900
Serial Number	SN 38/18 DIP 1G900-466
Product Condition (new / used)	Used

A yearly calibration interval is recommended.

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEEE 1528, FCC KDBs and CEI/IEC 62209 standards. The product is designed for use with the COMOSAR test bench only.



Figure 1 – MVG COMOSAR Validation Dipole

Page: 4/11

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SAR REFERENCE DIPOLE CALIBRATION REPORT

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4 MEASUREMENT METHOD

The IEEE 1528, FCC KDBs and CEI/IEC 62209 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards.

4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimensions frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness.

5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.1 dB

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
3 - 300	0.05 mm

5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %

Page: 5/11

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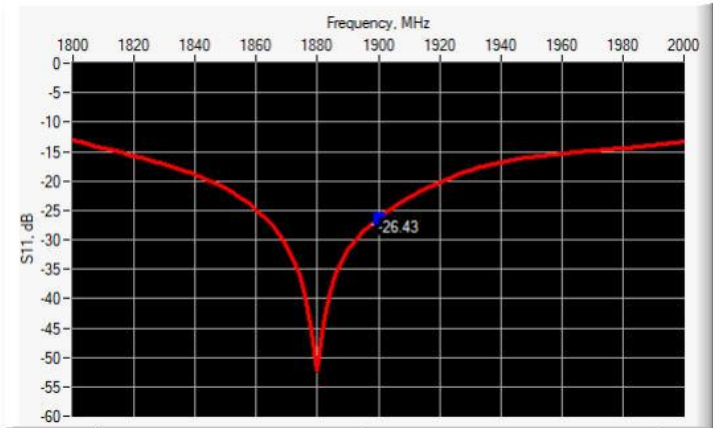
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.2.18.SATU.A

10 g	20.1 %
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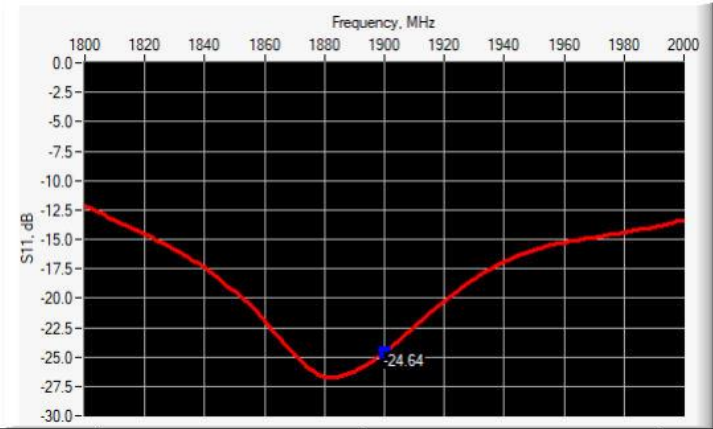
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-26.43	-20	50.5 Ω + 4.7 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-24.64	-20	46.2 Ω + 4.4 jΩ

6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	420.0 ±1 %		250.0 ±1 %		6.35 ±1 %	

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450	290.0 ±1 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.	PASS	39.5 ±1 %.	PASS	3.6 ±1 %.	PASS
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.		30.4 ±1 %.		3.6 ±1 %.	
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3500	37.0 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	

7 VALIDATION MEASUREMENT

The IEEE Std. 1528, FCC KDBs and CEM/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r)		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 ±5 %		0.87 ±5 %	
450	43.5 ±5 %		0.87 ±5 %	
750	41.9 ±5 %		0.89 ±5 %	
835	41.5 ±5 %		0.90 ±5 %	
900	41.5 ±5 %		0.97 ±5 %	
1450	40.5 ±5 %		1.20 ±5 %	
1500	40.4 ±5 %		1.23 ±5 %	
1640	40.2 ±5 %		1.31 ±5 %	
1750	40.1 ±5 %		1.37 ±5 %	

Page: 7/11

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1800	40.0 ±5 %		1.40 ±5 %	
1900	40.0 ±5 %	PASS	1.40 ±5 %	PASS
1950	40.0 ±5 %		1.40 ±5 %	
2000	40.0 ±5 %		1.40 ±5 %	
2100	39.8 ±5 %		1.49 ±5 %	
2300	39.5 ±5 %		1.67 ±5 %	
2450	39.2 ±5 %		1.80 ±5 %	
2600	39.0 ±5 %		1.96 ±5 %	
3000	38.5 ±5 %		2.40 ±5 %	
3500	37.9 ±5 %		2.91 ±5 %	

7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Head Liquid Values: $\epsilon_{ps}' : 38.5$ $\sigma : 1.45$
Distance between dipole center and liquid	10.0 mm
Area scan resolution	$dx=8mm/dy=8mm$
Zoon Scan Resolution	$dx=8mm/dy=8mm/dz=5mm$
Frequency	1900 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	

Page: 8/11

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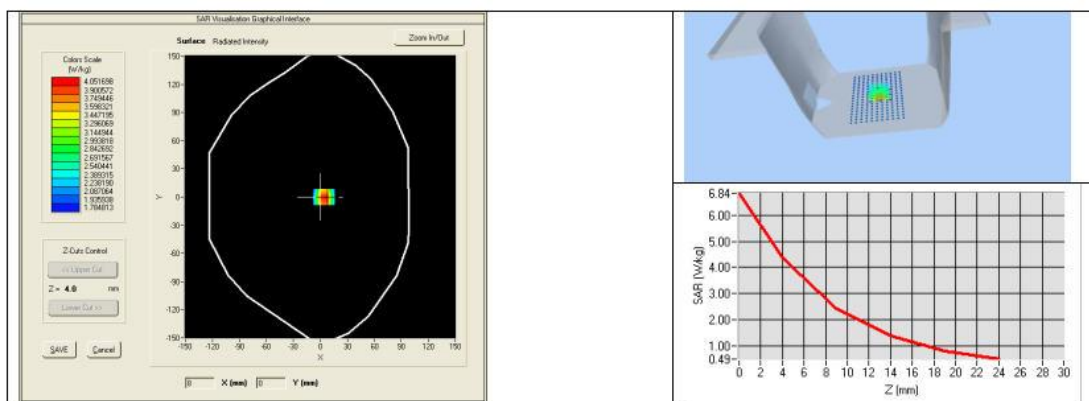
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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.2.18.SATU.A

1900	39.7	40.03 {4.00}	20.5	20.55 {2.06}
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	
3700	67.4		24.2	



7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r)		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 $\pm$ 5 %		0.80 $\pm$ 5 %	
300	58.2 $\pm$ 5 %		0.92 $\pm$ 5 %	
450	56.7 $\pm$ 5 %		0.94 $\pm$ 5 %	
750	55.5 $\pm$ 5 %		0.96 $\pm$ 5 %	
835	55.2 $\pm$ 5 %		0.97 $\pm$ 5 %	
900	55.0 $\pm$ 5 %		1.05 $\pm$ 5 %	
915	55.0 $\pm$ 5 %		1.06 $\pm$ 5 %	
1450	54.0 $\pm$ 5 %		1.30 $\pm$ 5 %	
1610	53.8 $\pm$ 5 %		1.40 $\pm$ 5 %	
1800	53.3 $\pm$ 5 %		1.52 $\pm$ 5 %	
1900	53.3 $\pm$ 5 %	PASS	1.52 $\pm$ 5 %	PASS
2000	53.3 $\pm$ 5 %		1.52 $\pm$ 5 %	
2100	53.2 $\pm$ 5 %		1.62 $\pm$ 5 %	

Page: 9/11

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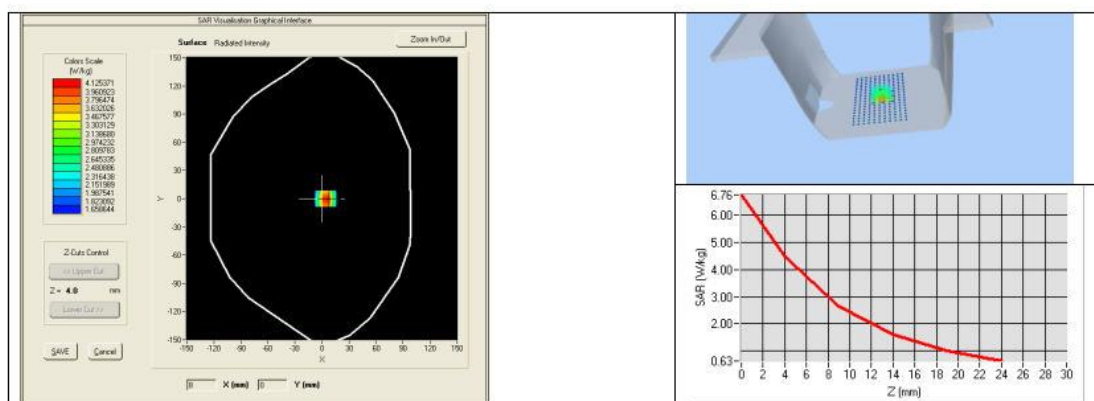
Ref: ACR.273.2.18.SATU.A

2300	52.9 ±5 %		1.81 ±5 %	
2450	52.7 ±5 %		1.95 ±5 %	
2600	52.5 ±5 %		2.16 ±5 %	
3000	52.0 ±5 %		2.73 ±5 %	
3500	51.3 ±5 %		3.31 ±5 %	
3700	51.0 ±5 %		3.55 ±5 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
5800	48.2 ±10 %		6.00 ±10 %	

7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Body Liquid Values: ϵ_{ps}' : 53.3 σ : 1.56
Distance between dipole center and liquid	10.0 mm
Area scan resolution	$dx=8mm/dy=8mm$
Zoon Scan Resolution	$dx=8mm/dy=8mm/dz=5mm$
Frequency	1900 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	1 g SAR (W/kg/W)	10 g SAR (W/kg/W)
	measured	measured
1900	40.91 (4.09)	21.40 (2.14)



Page: 10/11

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Ref: ACR.273.2.18.SATU.A

8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
SAM Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVA	SN100132	06/2021	06/2024
Calipers	Carrera	CALIPER-01	01/2023	01/2026
Reference Probe	MVG	EPG122 SN 18/11	08/2023	08/2024
Multimeter	Keithley 2000	1188656	01/2023	01/2026
Signal Generator	Agilent E4438C	MY49070581	01/2023	01/2026
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	11/2023	11/2026
Power Sensor	HP ECP-E26A	US37181460	01/2023	01/2026
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature and Humidity Sensor	Control Company	150798832	11/2023	11/2026

Page: 11/11

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6. SAR System PHOTOGRAPHS



Liquid depth $\geq 15\text{cm}$



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7. PHOTOGRAPHS OF THE TEST

Please refer to separated files for Test Setup Photos of SAR.



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8. EUT PHOTOGRAPHS

Please refer to separated files for Test Setup Photos of SAR.

.....The End of Test Report.....

