



SAR EVALUATION REPORT

Applicant Name:
ClearTrac Technologies, LLC
730 Quail Hollow Drive
Elizabethton, TN 37643

Date of Testing:
09/10/20 - 09/14/20
Test Site/Location:
PCTEST Lab, Columbia, MD, USA
Document Serial No.:
1M2007200109-02-R1.2AVN9


FCC ID: 2AVN910631
APPLICANT: CLEARTRAC TECHNOLOGIES

DUT Type: Portable Device
Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Class II Permissive Change: Integration of module into end-user product

Equipment Class	Band & Mode	Tx Frequency	SAR
			10g Extremity (W/kg)
PCB	LTE Band 13	779.5 - 784.5 MHz	< 0.1
PCB	LTE Band 4 (AWS)	1710.7 - 1754.3 MHz	< 0.1


This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.4 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.


Randy Ortanez
President





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1 DEVICE UNDER TEST

1.1 Device Overview



Band & Mode	Operating Modes	Tx Frequency
LTE Band 13	Data	779.5 - 784.5 MHz
LTE Band 4 (AWS)	Data	1710.7 - 1754.3 MHz

1.2 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

1.2.1 Maximum Output Power

Mode / Band		Modulated Average (dBm)
LTE Band 13	Maximum	22.5
	Nominal	21.5
LTE Band 4 (AWS)	Maximum	24.0
	Nominal	23.0

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1.3 Miscellaneous SAR Test Considerations

(A) Licensed Transmitter(s)

LTE SAR for the higher modulations and lower bandwidths were not tested since the maximum average output power of all required channels and configurations was not more than 0.5 dB higher than the highest bandwidth; and the reported LTE SAR for the highest bandwidth was less than 1.45 W/kg for all configurations according to FCC KDB 941225 D05v02r04.



Male and Female models were tested to see if there was a large variance in powers or SAR. Both have the same hardware components, but the size of the PCBA sensor is longer than the female. Otherwise the units are exactly the same.

1.4 Guidance Applied

- IEEE 1528-2013
- FCC KDB Publication 941225 D01v03r01, D05v02r04, D06v02r01 (4G)
- FCC KDB Publication 447498 D01v06 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)



1.5 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 11.

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2 LTE INFORMATION

LTE Information					
Form Factor	Portable Handset				
Frequency Range of each LTE transmission band	LTE Band 13 (779.5 - 784.5 MHz)				
	LTE Band 4 (AWS) (1710.7 - 1754.3 MHz)				
Channel Bandwidths	LTE Band 13: 5 MHz, 10 MHz				
	LTE Band 4 (AWS): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz, 15 MHz, 20 MHz				
Channel Numbers and Frequencies (MHz)	Low	Low-Mid	Mid	Mid-High	High
LTE Band 13: 5 MHz	779.5 (23205)		782 (23230)		784.5 (23255)
LTE Band 13: 10 MHz	N/A		782 (23230)		N/A
LTE Band 4 (AWS): 1.4 MHz	1710.7 (19957)		1732.5 (20175)		1754.3 (20393)
LTE Band 4 (AWS): 3 MHz	1711.5 (19965)		1732.5 (20175)		1753.5 (20385)
LTE Band 4 (AWS): 5 MHz	1712.5 (19975)		1732.5 (20175)		1752.5 (20375)
LTE Band 4 (AWS): 10 MHz	1715 (20000)		1732.5 (20175)		1750 (20350)
LTE Band 4 (AWS): 15 MHz	1717.5 (20025)		1732.5 (20175)		1747.5 (20325)
LTE Band 4 (AWS): 20 MHz	1720 (20050)		1732.5 (20175)		1745 (20300)
UE Category	Category M1				
Modulations Supported in UL	QPSK, 16QAM				
LTE MPR Permanently implemented per 3GPP TS 36.101 section 6.2.3~6.2.5? (manufacturer attestation to be provided)	YES				
A-MPR (Additional MPR) disabled for SAR Testing?	YES				

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3 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,” Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

3.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 3-1).

Equation 3-1
SAR Mathematical Equation

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



SAR is expressed in units of Watts per Kilogram (W/kg).

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

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m³)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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4 DOSIMETRIC ASSESSMENT

4.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 4-1) and IEEE 1528-2013.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 4-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):
 - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 4-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

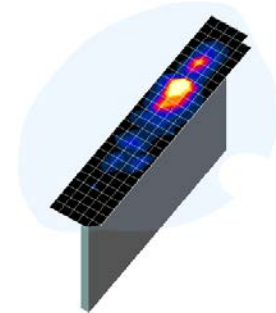




Figure 4-1
Sample SAR Area
Scan

Table 4-1
Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{\text{area}}, \Delta y_{\text{area}}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid	Graded Grid		
			$\Delta z_{\text{zoom}}(n)$	$\Delta z_{\text{zoom}}(1)^*$	$\Delta z_{\text{zoom}}(n>1)^*$	
≤2 GHz	≤15	≤8	≤5	≤4	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥30
2-3 GHz	≤12	≤5	≤5	≤4	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥30
3-4 GHz	≤12	≤5	≤4	≤3	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥28
4-5 GHz	≤10	≤4	≤3	≤2.5	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥25
5-6 GHz	≤10	≤4	≤2	≤2	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥22

*Also compliant to IEEE 1528-2013 Table 6

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5.1 EAR REFERENCE POINT

Figure 5-2 shows the front, back and side views of the SAM Twin Phantom. The point “M” is the reference point for the center of the mouth, “LE” is the left ear reference point (ERP), and “RE” is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 5-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front), also called the Reference Pivoting Line, is not perpendicular to the reference plane (see Figure 5-1). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].

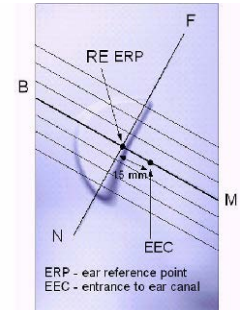


Figure 5-1
Close-Up Side view
of ERP

5.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the acoustic output located along the “vertical centerline” on the front of the device aligned to the “ear reference point” (See Figure 5-3). The acoustic output was then located at the same level as the center of the ear reference point. The test device was positioned so that the “vertical centerline” was bisecting the front surface of the handset at its top and bottom edges, positioning the “ear reference point” on the outer surface of the both the left and right head phantoms on the ear reference point.



Figure 5-2
Front, back and side view of SAM Twin Phantom

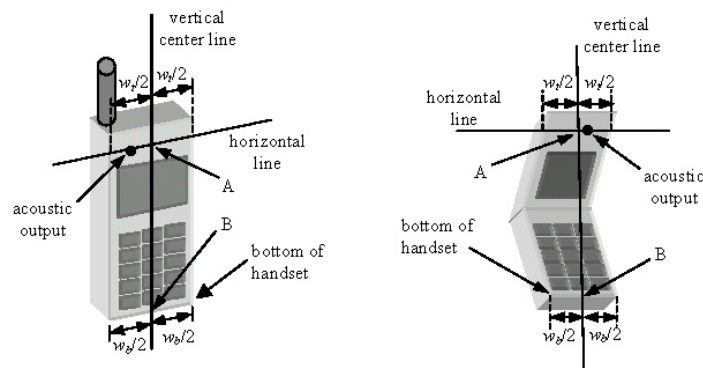




Figure 5-3
Handset Vertical Center & Horizontal Line Reference Points

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6 TEST CONFIGURATION POSITIONS



6.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$. phantom in a normal use configuration.

6.2 Extremity Exposure Configurations

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions; i.e., hands, wrists, feet and ankles, may require extremity SAR evaluation. When the device also operates in close proximity to the user's body, SAR compliance for the body is also required. The 1g body and 10g extremity SAR Exclusion Thresholds found in KDB Publication 447498 D01v06 should be applied to determine SAR test requirements.

Per KDB Publication 447498 D01v06, Cell phones (handsets) are not normally designed to be used on extremities or operated in extremity only exposure conditions. The maximum output power levels of handsets generally do not require extremity SAR testing to show compliance. Therefore, extremity SAR was not evaluated for this device.

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7 RF EXPOSURE LIMITS

7.1 Uncontrolled Environment

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



7.2 Controlled Environment

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

Table 7-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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8 FCC MEASUREMENT PROCEDURES

Power measurements for licensed transmitters are performed using a base station simulator under digital average power.

8.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

8.2 SAR Measurement Conditions for LTE

LTE modes are tested according to FCC KDB 941225 D05v02r04 publication. Establishing connections with base station simulators ensure a consistent means for testing SAR and are recommended for evaluating SAR [4]. The R&S CMW500 or Anritsu MT8820C simulators are used for LTE output power measurements and SAR testing. Closed loop power control was used so the UE transmits with maximum output power during SAR testing. SAR tests were performed with the same number of RB and RB offsets transmitting on all TTI frames (maximum TTI).

8.2.1 Spectrum Plots for RB Configurations

A properly configured base station simulator was used for SAR tests and power measurements. Therefore, spectrum plots for RB configurations were not required to be included in this report.

8.2.2 MPR

MPR is permanently implemented for this device by the manufacturer. The specific manufacturer target MPR is indicated alongside the SAR results. MPR is enabled for this device, according to 3GPP TS36.101 Section 6.2.3 – 6.2.5 under Table 6.2.3-1.



8.2.3 A-MPR

A-MPR (Additional MPR) has been disabled for all SAR tests by setting NS=01 on the base station simulator.




8.2.4 Required RB Size and RB Offsets for SAR Testing

According to FCC KDB 941225 D05v02r04:

- a. Per Section 5.2.1, SAR is required for QPSK 1 RB Allocation for the largest bandwidth
 - i. The required channel and offset combination with the highest maximum output power is required for SAR.
 - ii. When the reported SAR is ≤ 0.8 W/kg, testing of the remaining RB offset configurations and required test channels is not required. Otherwise, SAR is required for the remaining required test channels using the RB offset configuration with highest output power for that channel.
 - iii. When the reported SAR for a required test channel is > 1.45 W/kg, SAR is required for all RB offset configurations for that channel.

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- b. Per Section 5.2.2, SAR is required for 50% RB allocation using the largest bandwidth following the same procedures outlined in Section 5.2.1.
- c. Per Section 5.2.3, QPSK SAR is not required for the 100% allocation when the highest maximum output power for the 100% allocation is less than the highest maximum output power of the 1 RB and 50% RB allocations and the reported SAR for the 1 RB and 50% RB allocations is < 0.8 W/kg.
- d. Per Section 5.2.4 and 5.3, SAR tests for higher order modulations and lower bandwidths configurations are not required when the conducted power of the required test configurations determined by Sections 5.2.1 through 5.2.3 is less than or equal to ½ dB higher than the equivalent configuration using QPSK modulation and when the QPSK SAR for those configurations is <1.45 W/kg.

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9 RF CONDUCTED POWERS

9.1 LTE Conducted Powers

9.1.1 LTE Band 13



Table 9-1
LTE Band 13 Maximum Conducted Powers - 10 MHz Bandwidth

LTE Band 13 10 MHz Bandwidth					
Modulation	RB Size	RB Offset	Mid Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			23230 (782.0 MHz)		
			Conducted Power [dBm]		
QPSK	1	0	21.66	0	0
	1	2	21.56		0
	1	5	21.47		0
	3	0	21.57	0-1	0
	3	2	21.55		0
	3	3	21.58		0
	6	0	21.50		0
16QAM	1	0	21.60	0-1	0
	1	2	21.50		0
	1	5	21.44		0
	3	0	21.44	0-2	0
	3	2	21.38		0
	3	3	21.44		0
	6	0	21.60		0

Table 9-2
LTE Band 13 Maximum Conducted Powers - 5 MHz Bandwidth

LTE Band 13 5 MHz Bandwidth					
Modulation	RB Size	RB Offset	Mid Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			23230 (782.0 MHz)		
			Conducted Power [dBm]		
QPSK	1	0	21.60	0	0
	1	2	21.50		0
	1	5	21.61		0
	3	0	20.66	0-1	0
	3	2	20.62		0
	3	3	20.65		0
	6	0	20.66		0
16QAM	1	0	21.60	0-1	0
	1	2	21.61		0
	1	5	21.59		0
	3	0	20.77	0-2	0
	3	2	20.73		0
	3	3	20.76		0
	6	0	20.74		0

Note: LTE Band 13 at 5 MHz bandwidth does not support three non-overlapping channels. Per KDB Publication 941225 D05v02, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.

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9.1.2

LTE Band 4 (AWS)

Table 9-3
LTE Band 4 (AWS) Maximum Conducted Powers - 20 MHz Bandwidth

LTE Band 4 (AWS) 20 MHz Bandwidth					
Modulation	RB Size	RB Offset	Mid Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			20175 (1732.5 MHz)		
			Conducted Power [dBm]		
QPSK	1	0	23.01	0	0
	1	2	23.15		0
	1	5	23.14		0
	3	0	23.25	0-1	0
	3	2	23.13		0
	3	3	23.12		0
	6	0	23.03		0
16QAM	1	0	23.00	0-1	0
	1	2	23.10		0
	1	5	22.96		0
	3	0	22.90	0-2	0
	3	2	22.97		0
	3	3	22.82		0
	6	0	23.02		0

Note: LTE Band 4 (AWS) at 20 MHz bandwidth does not support three non-overlapping channels. Per KDB Publication 941225 D05v02, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.




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Table 9-4
LTE Band 4 (AWS) Maximum Conducted Powers - 15 MHz Bandwidth

LTE Band 4 (AWS) 15 MHz Bandwidth							
Modulation	RB Size	RB Offset	Low Channel	Mid Channel	High Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			20025 (1717.5 MHz)	20175 (1732.5 MHz)	20325 (1747.5 MHz)		
			Conducted Power [dBm]				
QPSK	1	0	23.00	23.06	23.02	0	0
	1	2	23.01	23.29	23.07		0
	1	5	23.03	23.08	23.04		0
	3	0	23.09	22.96	23.02	0-1	0
	3	2	23.19	23.06	23.06		0
	3	3	23.10	23.13	23.01		0
	6	0	23.04	23.01	23.04		0
16QAM	1	0	22.99	23.05	22.87	0-1	0
	1	2	23.00	23.12	23.01		0
	1	5	22.90	23.04	22.98		0
	3	0	22.83	22.96	22.97	0-2	0
	3	2	22.94	22.86	22.91		0
	3	3	22.75	23.12	22.83		0
	6	0	22.99	23.00	23.02		0

Table 9-5
LTE Band 4 (AWS) Maximum Conducted Powers - 10 MHz Bandwidth

LTE Band 4 (AWS) 10 MHz Bandwidth							
Modulation	RB Size	RB Offset	Low Channel	Mid Channel	High Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			20000 (1715.0 MHz)	20175 (1732.5 MHz)	20350 (1750.0 MHz)		
			Conducted Power [dBm]				
QPSK	1	0	23.09	23.05	23.14	0	0
	1	2	23.08	23.04	23.20		0
	1	5	23.16	23.06	23.10		0
	3	0	23.12	23.11	23.09	0-1	0
	3	2	23.23	23.17	23.14		0
	3	3	23.16	23.08	23.06		0
	6	0	23.00	23.07	23.02		0
16QAM	1	0	23.04	23.00	22.91	0-1	0
	1	2	23.07	23.01	23.08		0
	1	5	22.96	22.99	22.92		0
	3	0	22.96	22.85	22.78	0-2	0
	3	2	22.93	22.74	22.79		0
	3	3	22.91	22.73	22.74		0
	6	0	22.90	23.06	23.00		0



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Table 9-6
LTE Band 4 (AWS) Maximum Conducted Powers - 5 MHz Bandwidth

LTE Band 4 (AWS) 5 MHz Bandwidth							
Modulation	RB Size	RB Offset	Low Channel	Mid Channel	High Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			19975 (1712.5 MHz)	20175 (1732.5 MHz)	20375 (1752.5 MHz)		
			Conducted Power [dBm]				
QPSK	1	0	23.01	23.06	22.94	0	0
	1	2	23.16	23.16	22.98		0
	1	5	23.02	22.99	22.89		0
	3	0	22.25	22.20	22.20	0-1	0
	3	2	22.25	22.30	22.10		0
	3	3	22.18	22.29	22.01		0
	6	0	23.00	23.06	22.90		0
16QAM	1	0	22.95	23.00	22.90	0-1	0
	1	2	23.10	23.12	22.93		0
	1	5	22.99	22.95	22.90		0
	3	0	22.20	22.19	22.10	0-2	0
	3	2	22.17	22.18	22.12		0
	3	3	22.19	22.20	22.14		0
	6	0	22.98	22.96	22.87		0

Table 9-7
LTE Band 4 (AWS) Maximum Conducted Powers - 3 MHz Bandwidth

LTE Band 4 (AWS) 3 MHz Bandwidth							
Modulation	RB Size	RB Offset	Low Channel	Mid Channel	High Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			19965 (1711.5 MHz)	20175 (1732.5 MHz)	20385 (1753.5 MHz)		
			Conducted Power [dBm]				
QPSK	1	0	23.00	23.05	22.92	0	0
	1	2	23.25	23.20	22.97		0
	1	5	23.06	23.01	22.98		0
	3	0	22.13	22.05	21.98	0-1	0
	3	2	22.12	22.17	21.96		0
	3	3	22.17	22.07	22.12		0
	6	0	23.10	23.02	23.04		0
16QAM	1	0	22.00	22.05	22.10	0-1	0
	1	2	22.05	22.15	22.09		0
	1	5	21.90	21.99	21.94		0
	3	0	21.42	21.33	21.40	0-2	0
	3	2	21.50	21.30	21.43		0
	3	3	21.33	21.25	21.27		0
	6	0	23.00	22.96	22.90		0





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Table 9-8
LTE Band 4 (AWS) Maximum Conducted Powers - 1.4 MHz Bandwidth

LTE Band 4 (AWS) 1.4 MHz Bandwidth							
Modulation	RB Size	RB Offset	Low Channel	Mid Channel	High Channel	MPR Allowed per 3GPP [dB]	MPR [dB]
			19957 (1710.7 MHz)	20175 (1732.5 MHz)	20393 (1754.3 MHz)		
			Conducted Power [dBm]				
QPSK	1	0	23.20	23.11	22.94	0	0
	1	2	23.18	23.23	22.97		0
	1	5	23.05	23.02	23.00		0
	3	0	22.16	22.18	21.98		0
	3	2	22.18	22.08	21.99		0
	3	3	22.04	22.15	22.02		0
	6	0	23.00	23.02	23.05	0-1	0
16QAM	1	0	22.16	22.00	22.12	0-1	0
	1	2	22.09	22.04	22.00		0
	1	5	22.14	22.10	22.04		0
	3	0	21.25	21.28	21.24		0
	3	2	21.42	21.30	21.37		0
	3	3	21.33	21.26	21.36		0
	6	0	22.96	23.00	22.98	0-2	0

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10 SYSTEM VERIFICATION

10.1 Tissue Verification

Table 10-1
Measured Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
09/14/2020	750 Body	21.4	750	0.939	56.278	0.964	55.531	-2.59%	1.35%
			770	0.947	56.235	0.965	55.453	-1.87%	1.41%
			785	0.953	56.203	0.966	55.395	-1.35%	1.46%
09/10/2020	1750 Body	22.1	1710	1.460	52.189	1.463	53.537	-0.21%	-2.52%
			1720	1.472	52.152	1.469	53.511	0.20%	-2.54%
			1745	1.500	52.072	1.485	53.445	1.01%	-2.57%
			1750	1.506	52.055	1.488	53.432	1.21%	-2.58%
			1770	1.526	51.974	1.501	53.379	1.67%	-2.63%
			1790	1.547	51.885	1.514	53.326	2.18%	-2.70%

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

10.2 Test System Verification

Prior to SAR assessment, the system is verified to $\pm 10\%$ of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in Appendix D.

Table 10-2
System Verification Results

System Verification TARGET & MEASURED												
SAR System #	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Source SN	Probe SN	Measured SAR _{10g} (W/kg)	1 W Target SAR _{10g} (W/kg)	1 W Normalized SAR _{10g} (W/kg)	Deviation _{10g} (%)
O	750	BODY	09/14/2020	24.7	21.9	0.200	1054	7547	1.210	5.630	6.050	7.46%
I	1750	BODY	09/10/2020	21.6	22.1	0.100	1008	7570	2.060	19.900	20.600	3.52%

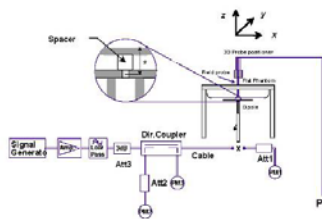




Figure 10-1
System Verification Setup Diagram



Figure 10-2
System Verification Setup Photo

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11 SAR DATA SUMMARY

11.1 Standalone Extremity SAR Data

Table 11-1
LTE Band 13 and 4 Extremity SAR

MEASUREMENT RESULTS																			
FREQUENCY			Mode	Bandwidth [MHz]	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Power Drift [dB]	MPR [dB]	Model	Modulation	RB Size	RB Offset	Spacing	Side	Duty Cycle	SAR (10g)	Scaling Factor	Reported SAR (10g)	Plot #
MHz	Ch.															(W/kg)		(W/kg)	
782.00	23230	Mid	LTE Band 13	10	22.5	21.66	-0.09	0	Male	QPSK	1	0	0 mm	top	1:1	0.017	1.213	0.021	
782.00	23230	Mid	LTE Band 13	10	22.5	21.58	-0.11	0	Male	QPSK	3	3	0 mm	top	1:1	0.014	1.236	0.017	
782.00	23230	Mid	LTE Band 13	10	22.5	21.58	0.02	0	Female	QPSK	3	3	0 mm	top	1:1	0.027	1.236	0.033	A1
1732.50	20175	Mid	LTE Band 4 (AWS)	20	24.0	23.15	0.01	0	Male	QPSK	1	2	0 mm	top	1:1	0.066	1.216	0.080	A2
1732.50	20175	Mid	LTE Band 4 (AWS)	20	24.0	23.25	0.05	0	Male	QPSK	3	0	0 mm	top	1:1	0.055	1.189	0.065	
1732.50	20175	Mid	LTE Band 4 (AWS)	20	24.0	23.15	-0.06	0	Female	QPSK	1	2	0 mm	top	1:1	0.031	1.216	0.038	
1732.50	20175	Mid	LTE Band 4 (AWS)	20	24.0	23.25	0.07	0	Female	QPSK	3	0	0 mm	top	1:1	0.047	1.189	0.056	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population								Extremity 4.0 W/kg (mW/g) averaged over 10 grams											



11.2 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
2. Batteries are fully charged at the beginning of the SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
6. Per FCC KDB 865664 D01v01r04, variability SAR tests were performed when the measured SAR results for a frequency band were greater than or equal to 0.8 W/kg. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg.

LTE Notes:

1. LTE test configurations are determined according to SAR Evaluation Considerations for LTE Devices in FCC KDB Publication 941225 D05v02r04. The general test procedures used for testing can be found in Section 8.4.4.
2. MPR is permanently implemented for this device by the manufacturer. The specific manufacturer target MPR is indicated alongside the SAR results. MPR is enabled for this device, according to 3GPP TS36.101 Section 6.2.3 – 6.2.5 under Table 6.2.3-1.
3. A-MPR was disabled for all SAR tests by setting NS=01 on the base station simulator. SAR tests were performed with the same number of RB and RB offsets transmitting on all TTI frames (maximum TTI).

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12 SAR MEASUREMENT VARIABILITY

12.1 Measurement Variability



Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was assessed for each frequency band, which was determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media were required for SAR measurements in a frequency band, the variability measurement procedures were applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. These additional measurements were repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device was returned to ambient conditions (normal room temperature) with the battery fully charged before it was re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR Measurement Variability was assessed using the following procedures for each frequency band:

- 1) When the original highest measured SAR is ≥ 0.80 W/kg, the measurement was repeated once.
- 2) A second repeated measurement was performed only if the ratio of largest to smallest SAR for the original and first repeated measurements was > 1.20 or when the original or repeated measurement was ≥ 1.45 W/kg (~ 10% from the 1g SAR limit).
- 3) A third repeated measurement was performed only if the original, first or second repeated measurement was ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .
- 4) Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg

12.2 Measurement Uncertainty



The measured SAR was < 1.5 W/kg for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 was not required.

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13 EQUIPMENT LIST


Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8594A	(9kHz-2.9GHz) Spectrum Analyzer	CBT	N/A	CBT	3051A00187
Agilent	85033E	3.5mm Standard Calibration Kit	6/6/2020	Annual	6/6/2021	MY53402352
Agilent	E5515C	8960 Series 10 Wireless Communications Test Set	2/10/2020	Annual	2/10/2021	GB42230325
Agilent	E4438C	ESG Vector Signal Generator	9/30/2019	Annual	9/30/2020	US41460739
Agilent	8753ES	Network Analyzer	3/5/2020	Annual	3/5/2021	MY40001472
Control Company	4040	Therm./Clock/Humidity Monitor	6/29/2019	Biennial	6/29/2021	192291463
Control Company	4040	Therm./Clock/Humidity Monitor	6/29/2019	Biennial	6/29/2021	192291470
Control Company	4352	Ultra Long Stem Thermometer	8/2/2018	Biennial	8/2/2020	181292000
Control Company	4352	Ultra Long Stem Thermometer	8/2/2018	Biennial	8/2/2020	181292054
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Pasternack	PE2208-6	Bidirectional Coupler	CBT	N/A	CBT	N/A
Pasternack	PE2209-10	Bidirectional Coupler	CBT	N/A	CBT	N/A
Rohde & Schwarz	CMW500	Wideband Radio Communication Tester	2/4/2020	Annual	2/4/2021	162125
SPEAG	DAK-3.5	Dielectric Assessment Kit	5/12/2020	Annual	5/12/2021	1070
COMTech	AR85729-5	Solid State Amplifier	CBT	N/A	CBT	M1S5A00-009
COMTECH	AR85729-5/5759B	Solid State Amplifier	CBT	N/A	CBT	M3W1A00-1002
Anritsu	ML2495A	Power Meter	12/17/2019	Annual	12/17/2020	941001
Anritsu	ML2495A	Power Meter	11/15/2019	Annual	11/15/2020	1039008
SPEAG	D750V3	750 MHz Dipole	3/11/2020	Annual	3/11/2021	1054
SPEAG	D1765V2	1765 MHz SAR Dipole	5/23/2018	Triennial	5/23/2021	1008
SPEAG	EX3DV4	SAR Probe	8/19/2020	Annual	8/19/2021	7547
SPEAG	EX3DV4	SAR Probe	12/11/2019	Annual	12/11/2020	7570
SPEAG	DAE4	Dasy Data Acquisition Electronics	8/12/2020	Annual	8/12/2021	1323
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/12/2020	Annual	3/12/2021	1368

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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14 MEASUREMENT UNCERTAINTIES

a	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System								
Probe Calibration	6.55	N	1	1.0	1.0	6.6	6.6	∞
Axial Isotropy	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	2.0	R	1.73	1.0	1.0	1.2	1.2	∞
Linearity	0.3	N	1	1.0	1.0	0.3	0.3	∞
System Detection Limits	0.25	R	1.73	1.0	1.0	0.1	0.1	∞
Readout Electronics	0.3	N	1	1.0	1.0	0.3	0.3	∞
Response Time	0.8	R	1.73	1.0	1.0	0.5	0.5	∞
Integration Time	2.6	R	1.73	1.0	1.0	1.5	1.5	∞
RF Ambient Conditions - Noise	3.0	R	1.73	1.0	1.0	1.7	1.7	∞
RF Ambient Conditions - Reflections	3.0	R	1.73	1.0	1.0	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	0.4	R	1.73	1.0	1.0	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	6.7	R	1.73	1.0	1.0	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	4.0	R	1.73	1.0	1.0	2.3	2.3	∞
Test Sample Related								
Test Sample Positioning	2.7	N	1	1.0	1.0	2.7	2.7	35
Device Holder Uncertainty	1.67	N	1	1.0	1.0	1.7	1.7	5
Output Power Variation - SAR drift measurement	5.0	R	1.73	1.0	1.0	2.9	2.9	∞
SAR Scaling	0.0	R	1.73	1.0	1.0	0.0	0.0	∞
Phantom & Tissue Parameters								
Phantom Uncertainty (Shape & Thickness tolerances)	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	4.2	N	1	0.78	0.71	3.3	3.0	10
Liquid Permittivity - measurement uncertainty	4.1	N	1	0.23	0.26	1.0	1.1	10
Liquid Conductivity - Temperature Uncertainty	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)						RSS	11.5	11.3
Expanded Uncertainty (95% CONFIDENCE LEVEL)						k=2	23.0	22.6



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15 CONCLUSION

15.1 Measurement Conclusion



The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]



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16 REFERENCES

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FCC ID: 2AVN910631	 PCTEST Proud to be part of the ClearTrac network	SAR EVALUATION REPORT	 ClearTrac Technologies	Approved by: Quality Manager
Document S/N: 1M2007200109-02-R1.2AVN9	Test Dates: 09/10/20 - 09/14/20	DUT Type: Portable Device		Page 24 of 25

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FCC ID: 2AVN910631	 PCTEST Proud to be part of the ClearTrac network	SAR EVALUATION REPORT	 ClearTrac Technologies	Approved by: Quality Manager
Document S/N: 1M2007200109-02-R1.2AVN9	Test Dates: 09/10/20 - 09/14/20	DUT Type: Portable Device		Page 25 of 25

APPENDIX A: SAR TEST DATA

PCTEST

DUT: 2AVN910631; Type: Portable Device

Communication System: UID 0, LTE Band 13; Frequency: 782 MHz; Duty Cycle: 1:1

Medium: 750 Body; Medium parameters used (interpolated):

$f = 782 \text{ MHz}$; $\sigma = 0.952 \text{ S/m}$; $\epsilon_r = 56.209$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section; Space: 0.0 cm

Test Date: 09/14/2020; Ambient Temp: 24.7°C; Tissue Temp: 21.9°C

Probe: EX3DV4 - SN7547; ConvF(9.98, 9.98, 9.98) @ 782 MHz; Calibrated: 8/19/2020

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1323; Calibrated: 8/12/2020

Phantom: Left Twin-SAM V5.0 (30); Type: QD 000 P40 CD; Serial: 1792

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

**Mode: LTE Band 13, Female, Body SAR, Top Edge, Mid.ch,
10 MHz Bandwidth, QPSK, 3 RB, 3 RB Offset**

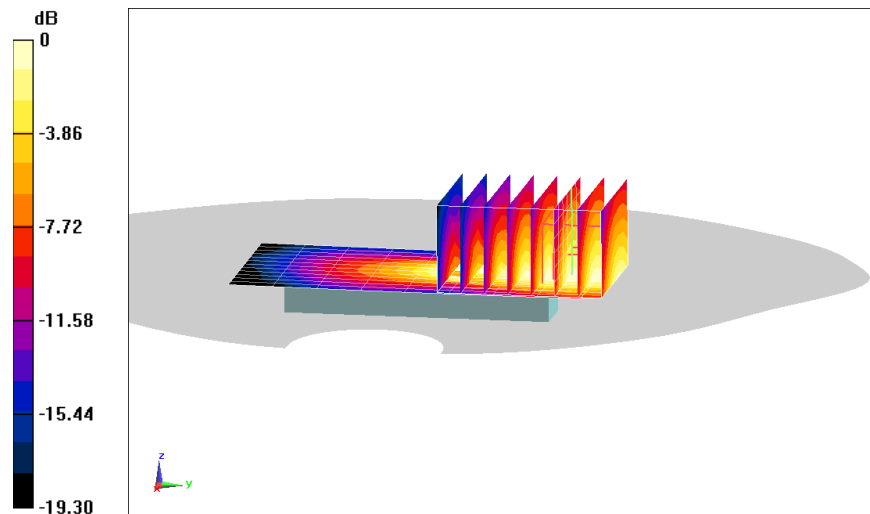
Area Scan (13x9x1): Measurement grid: $dx=5\text{mm}$, $dy=15\text{mm}$

Zoom Scan (7x8x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$

Reference Value = 4.632 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 0.0630 W/kg

SAR(10 g) = 0.027 W/kg; SAR(1g) = 0.04 W/kg



0 dB = 0.0554 W/kg = -12.56 dBW/kg

PCTEST

DUT: 2AVN910631; Type: Portable Device

Communication System: UID 0, LTE Band 4 (AWS); Frequency: 1732.5 MHz; Duty Cycle: 1:1

Medium: 1750 Body; Medium parameters used (interpolated):

$f = 1732.5$ MHz; $\sigma = 1.486$ S/m; $\epsilon_r = 52.112$; $\rho = 1000$ kg/m³

Phantom section: Flat Section; Space: 0.0 cm

Test Date: 09/10/2020; Ambient Temp: 21.6°C; Tissue Temp: 22.1°C

Probe: EX3DV4 - SN7570; ConvF(8.48, 8.48, 8.48) @ 1732.5 MHz; Calibrated: 12/11/2019

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1368; Calibrated: 3/12/2020

Phantom: Right Back Twin-SAM V5.0 (30); Type: QD 000 P40 CD; Serial: 1692

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

**Mode: LTE Band 4 (AWS), Male, Body SAR, Top Edge, Mid.ch,
20 MHz Bandwidth, QPSK, 1 RB, 2 RB Offset**

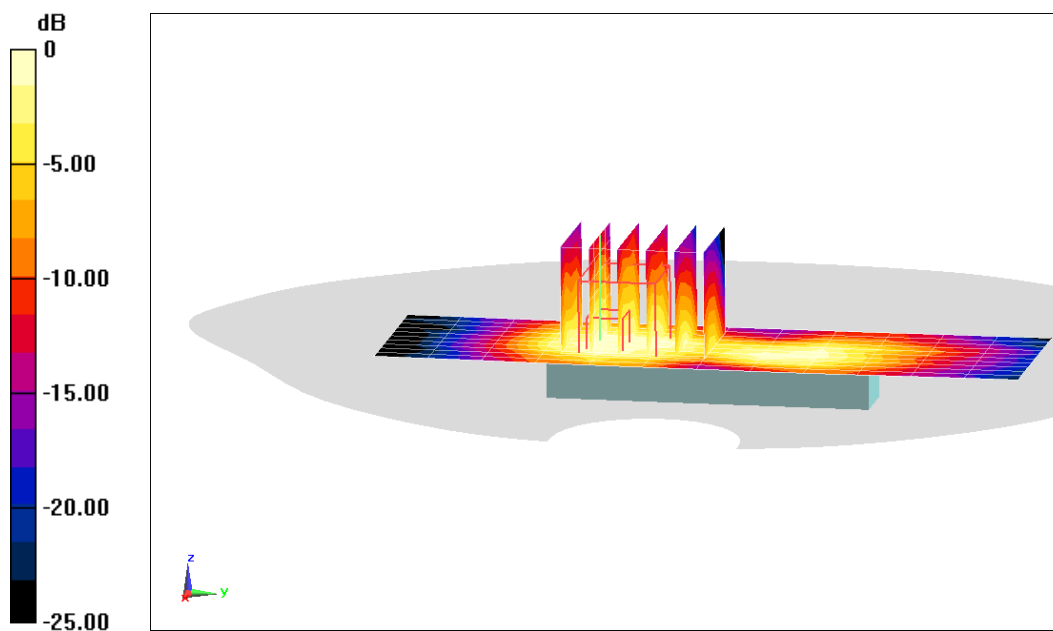
Area Scan (11x13x1): Measurement grid: dx=5mm, dy=15mm

Zoom Scan (5x6x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 9.030 V/m; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 0.175 W/kg

SAR(10 g) = 0.066 W/kg; SAR(1g) = 0.107 W/kg



0 dB = 0.150 W/kg = -8.24 dBW/kg

APPENDIX B: SYSTEM VERIFICATION

PCTEST

DUT: Dipole 750 MHz; Type: D750V3; Serial: 1054

Communication System: UID 0, CW; Frequency: 750 MHz; Duty Cycle: 1:1

Medium: 750 Body Medium parameters used:

$f = 750 \text{ MHz}$; $\sigma = 0.939 \text{ S/m}$; $\epsilon_r = 56.278$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section; Space: 1.5 cm

Test Date: 09/14/2020; Ambient Temp: 24.7°C; Tissue Temp: 21.9°C

Probe: EX3DV4 - SN7547; ConvF(9.98, 9.98, 9.98) @ 750 MHz; Calibrated: 8/19/2020

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1323; Calibrated: 8/12/2020

Phantom: Left Twin-SAM V5.0 (30); Type: QD 000 P40 CD; Serial: 1792

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

750 MHz System Verification at 23.0 dBm (200 mW)

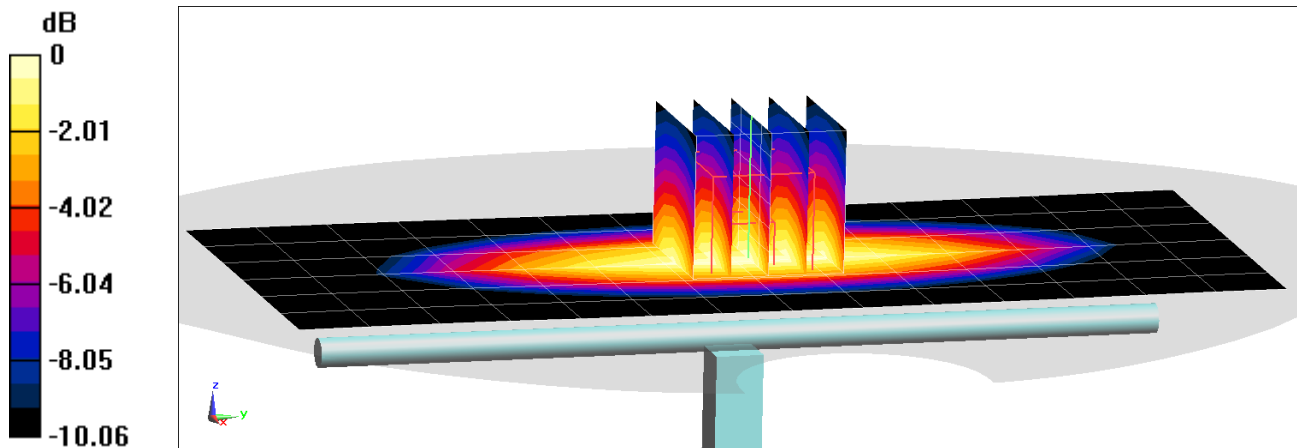
Area Scan (7x15x1): Measurement grid: $dx=15\text{mm}$, $dy=15\text{mm}$

Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$

Peak SAR (extrapolated) = 2.69 W/kg

SAR(10 g) = 1.21 W/kg

Deviation(10 g) = 7.46%



0 dB = 2.40 W/kg = 3.80 dBW/kg

PCTEST

DUT: Dipole 1750 MHz; Type: D1765V2; Serial: 1008

Communication System: UID 0, CW; Frequency: 1750 MHz; Duty Cycle: 1:1

Medium: 1750 Body Medium parameters used:

$f = 1750 \text{ MHz}$; $\sigma = 1.506 \text{ S/m}$; $\epsilon_r = 52.055$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section; Space: 1.0 cm

Test Date: 09/10/2020; Ambient Temp: 21.6°C; Tissue Temp: 22.1°C

Probe: EX3DV4 - SN7570; ConvF(8.48, 8.48, 8.48) @ 1750 MHz; Calibrated: 12/11/2019

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1368; Calibrated: 3/12/2020

Phantom: Right Back Twin-SAM V5.0 (30); Type: QD 000 P40 CD; Serial: 1692

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

1750 MHz System Verification at 20.0 dBm (100 mW)

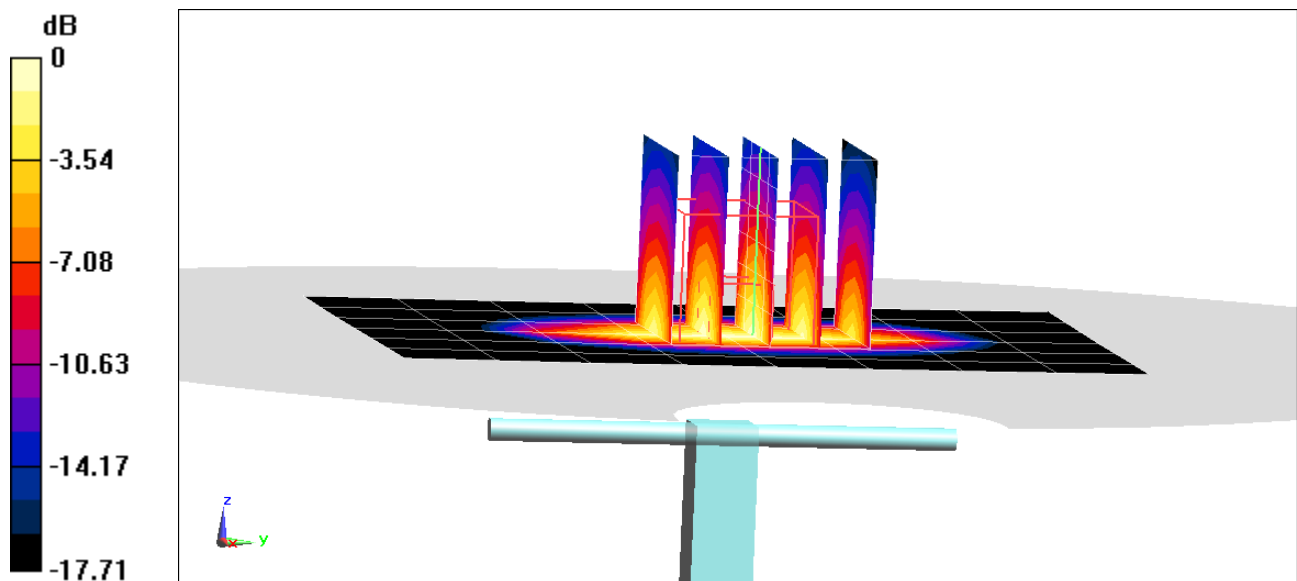
Area Scan (7x9x1): Measurement grid: $dx=15\text{mm}$, $dy=15\text{mm}$

Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$

Peak SAR (extrapolated) = 7.15 W/kg

SAR(10 g) = 2.06 W/kg

Deviation(10 g) = 3.52%



APPENDIX C: SAR TISSUE SPECIFICATIONS

Measurement Procedure for Tissue verification:

- 1) The network analyzer and probe system was configured and calibrated.
- 2) The probe was immersed in the tissue. The tissue was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
- 3) The complex admittance with respect to the probe aperture was measured
- 4) The complex relative permittivity ϵ' can be calculated from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\epsilon_r\epsilon_0}{[\ln(b/a)]^2} \int_a^b \int_a^b \int_0^\pi \cos\phi' \frac{\exp[-j\omega r(\mu_0\epsilon_r'\epsilon_0)^{1/2}]}{r} d\phi' d\rho' d\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively, $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$, ω is the angular frequency, and $j = \sqrt{-1}$.

3 Composition / Information on ingredients

3.2 Mixtures

Description: Aqueous solution with surfactants and inhibitors

Declarable, or hazardous components:

CAS: 107-21-1 EINECS: 203-473-3 Reg.nr.: 01-2119456816-28-0000	Ethanedial STOT RE 2, H373; Acute Tox. 4, H302	>1.0-4.9%
CAS: 68608-26-4 EINECS: 271-781-5 Reg.nr.: 01-2119527859-22-0000	Sodium petroleum sulfonate Eye Irrit. 2, H319	< 2.9%
CAS: 107-41-5 EINECS: 203-489-0 Reg.nr.: 01-2119539582-35-0000	Hexylene Glycol / 2-Methyl-pentane-2,4-diol Skin Irrit. 2, H315; Eye Irrit. 2, H319	< 2.9%
CAS: 68920-66-1 NLP: 500-236-9 Reg.nr.: 01-2119489407-26-0000	Alkoxylated alcohol, > C₁₆ Aquatic Chronic 2, H411; Skin Irrit. 2, H315; Eye Irrit. 2, H319	< 2.0%

Additional information:



For the wording of the listed risk phrases refer to section 16.

Not mentioned CAS-, EINECS- or registration numbers are to be regarded as Proprietary/Confidential.

The specific chemical identity and/or exact percentage concentration of proprietary components is withheld as a trade secret.

Figure C-1

Note: Liquid recipes are proprietary SPEAG. Since the composition is approximate to the actual liquids utilized, the manufacturer tissue-equivalent liquid data sheets are provided below.

FCC ID: 2AVN910631	 PCTEST Proud to be part of the element	SAR EVALUATION REPORT	 ClearTrac TECHNOLOGIES	Approved by: Quality Manager
Test Dates: 09/10/20 - 09/14/20	DUT Type: Portable Device			APPENDIX C: Page 1 of 2

Measurement Certificate / Material Test

Item Name Body Tissue Simulating Liquid (MBBL600-6000V6)
Product No. SL AAM U16 BC (Batch: 181029-1)
Manufacturer SPEAG

Measurement Method

TSL dielectric parameters measured using calibrated DAK probe.

Target Parameters

Target parameters as defined in the KDB 865864 compliance standard.

Test Condition

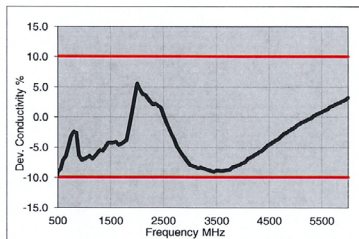
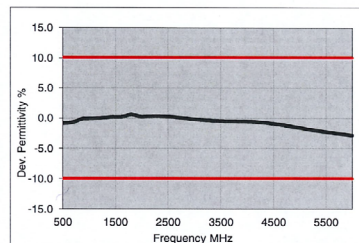
Ambient Condition 22°C ; 30% humidity
TSL Temperature 22°C
Test Date 30-Oct-18
Operator CL

Additional Information

TSL Density
TSL Heat-capacity

Results

f [MHz]	Measured			Target		Diff.to Target [%]	
	e'	e''	sigma	eps	sigma	Δ-eps	Δ-sigma
800	55.1	21.3	0.95	55.3	0.97	-0.4	-2.1
825	55.1	20.8	0.96	55.2	0.98	-0.3	-2.0
835	55.1	20.6	0.96	55.1	0.99	0.0	-2.5
850	55.1	20.4	0.96	55.2	0.99	-0.1	-3.0
900	55.0	19.7	0.98	55.0	1.05	0.0	-6.7
1400	54.2	15.6	1.22	54.1	1.28	0.2	-4.7
1450	54.1	15.4	1.24	54.0	1.30	0.2	-4.6
1500	54.1	15.3	1.27	53.9	1.33	0.3	-4.5
1550	54.0	15.1	1.30	53.9	1.36	0.2	-4.4
1600	53.9	15.0	1.33	53.8	1.39	0.2	-4.3
1625	53.9	14.9	1.35	53.8	1.41	0.3	-4.3
1640	53.9	14.9	1.36	53.7	1.42	0.3	-4.2
1650	53.8	14.9	1.36	53.7	1.43	0.2	-4.9
1700	53.8	14.8	1.40	53.6	1.46	0.4	-4.1
1750	53.7	14.7	1.43	53.4	1.49	0.5	-4.0
1800	53.7	14.6	1.46	53.3	1.52	0.8	-3.9
1810	53.7	14.6	1.47	53.3	1.52	0.8	-3.3
1825	53.7	14.6	1.48	53.3	1.52	0.8	-2.6
1850	53.6	14.5	1.50	53.3	1.52	0.6	-1.3
1900	53.5	14.5	1.53	53.3	1.52	0.4	0.7
1950	53.5	14.5	1.57	53.3	1.52	0.4	3.3
2000	53.4	14.4	1.60	53.3	1.52	0.2	5.3
2050	53.4	14.4	1.64	53.2	1.57	0.3	4.5
2100	53.3	14.4	1.68	53.2	1.62	0.2	3.7
2150	53.3	14.4	1.72	53.1	1.66	0.4	3.6
2200	53.2	14.4	1.76	53.0	1.71	0.3	2.9
2250	53.1	14.4	1.81	53.0	1.76	0.2	2.8
2300	53.1	14.4	1.85	52.9	1.81	0.4	2.2
2350	53.0	14.5	1.89	52.8	1.85	0.3	2.2
2400	52.9	14.5	1.94	52.8	1.90	0.2	2.1
2450	52.9	14.5	1.98	52.7	1.95	0.4	1.5
2500	52.8	14.6	2.03	52.6	2.02	0.3	0.5
2550	52.7	14.6	2.07	52.6	2.09	0.2	-1.0
2600	52.6	14.7	2.12	52.5	2.16	0.2	-1.9





3500	51.1	15.5	3.02	51.3	3.31	-0.4	-8.8
3700	50.8	15.7	3.24	51.1	3.55	-0.5	-8.8
5200	48.1	18.2	5.27	49.0	5.30	-1.8	-0.6
5250	48.0	18.3	5.34	49.0	5.36	-1.9	-0.4
5300	47.9	18.4	5.41	48.9	5.42	-2.0	-0.2
5500	47.5	18.6	5.70	48.6	5.65	-2.2	0.8
5600	47.3	18.8	5.84	48.5	5.77	-2.3	1.3
5700	47.1	18.9	5.99	48.3	5.88	-2.5	1.8
5800	47.0	19.0	6.14	48.2	6.00	-2.6	2.3

TSL Dielectric Parameters

1

Figure C-2
600 – 5800 MHz Body Tissue Equivalent Matter

FCC ID: 2AVN910631	 PCTEST Proud to be part of the environment	SAR EVALUATION REPORT	 ClearTrac TECHNOLOGIES	Approved by: Quality Manager
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APPENDIX D: SAR SYSTEM VALIDATION



Per FCC KDB Publication 865664 D02v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue- equivalent media for system validation, according to the procedures outlined in FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013. Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point, using the system that normally operates with the probe for routine SAR measurements and according to the required tissue-equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table D-1
SAR System Validation Summary – 10g

SAR System	Freq. (MHz)	Date	Probe SN	Probe Cal Point		Cond. (σ)	Perm. (εr)	CW VALIDATION			MOD. VALIDATION		
								SENSITIVITY	PROBE LINEARITY	PROBE ISOTROPY	MOD. TYPE	DUTY FACTOR	PAR
O	750	9/9/2020	7547	750	Body	0.948	54.67	PASS	PASS	PASS	N/A	N/A	N/A
I	1750	6/17/2020	7570	1750	Body	1.518	52.03	PASS	PASS	PASS	N/A	N/A	N/A

NOTE: While the probes have been calibrated for both CW and modulated signals, all measurements were performed using communication systems calibrated for CW signals only. Modulations in the table above represent test configurations for which the measurement system has been validated per FCC KDB Publication 865664 D01v01r04 for scenarios when CW probe calibrations are used with other signal types. SAR systems were validated for modulated signals with a periodic duty cycle, such as GMSK, or with a high peak to average ratio (>5 dB), such as OFDM according to FCC KDB Publication 865664 D01v01r04.

FCC ID: 2AVN910631	 PCTEST <small>Proud to be part of the element</small>	SAR EVALUATION REPORT	 ClearTrac <small>TECHNOLOGIES</small>	Approved by: Quality Manager
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APPENDIX F: PROBE AND DIPOLE CALIBRATION CERTIFICATES



Accredited by the Swiss Accreditation Service (SAS)

Accreditation No.: **SCS 0108**

The Swiss Accreditation Service is one of the signatories to the EA
 Multilateral Agreement for the recognition of calibration certificates

Client **PC Test**

Certificate No: **D750V3-1054_Mar20**

CALIBRATION CERTIFICATE

Object **D750V3 - SN:1054**

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

Calibration date: **March 11, 2020**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	03-Apr-19 (No. 217-02892/02893)	Apr-20
Power sensor NRP-Z91	SN: 103244	03-Apr-19 (No. 217-02892)	Apr-20
Power sensor NRP-Z91	SN: 103245	03-Apr-19 (No. 217-02893)	Apr-20
Reference 20 dB Attenuator	SN: 5058 (20k)	04-Apr-19 (No. 217-02894)	Apr-20
Type-N mismatch combination	SN: 5047.2 / 06327	04-Apr-19 (No. 217-02895)	Apr-20
Reference Probe EX3DV4	SN: 7349	31-Dec-19 (No. EX3-7349_Dec19)	Dec-20
DAE4	SN: 601	27-Dec-19 (No. DAE4-601_Dec19)	Dec-20
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB39512475	30-Oct-14 (in house check Feb-19)	In house check: Oct-20
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-18)	In house check: Oct-20
Power sensor HP 8481A	SN: MY41092317	07-Oct-15 (in house check Oct-18)	In house check: Oct-20
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-18)	In house check: Oct-20
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-19)	In house check: Oct-20

Calibrated by: **Claudio Leubler** **Laboratory Technician**

Approved by: **Katja Pokovic** **Technical Manager**

Signature

Issued: March 19, 2020

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions:* Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:* The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss:* These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay:* One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured:* SAR measured at the stated antenna input power.
- SAR normalized:* SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:* The measured TSL parameters are used to calculate the nominal SAR result.

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

Measurement Conditions

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

DASY Version	DASY5	V52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	15 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	750 MHz \pm 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	41.9	0.89 mho/m
Measured Head TSL parameters	(22.0 \pm 0.2) °C	42.5 \pm 6 %	0.88 mho/m \pm 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	2.13 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	8.63 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	1.41 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	5.69 W/kg \pm 16.5 % (k=2)

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	55.5	0.96 mho/m
Measured Body TSL parameters	(22.0 \pm 0.2) °C	54.7 \pm 6 %	0.96 mho/m \pm 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm³ (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	2.14 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	8.53 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Body TSL	condition	
SAR measured	250 mW input power	1.41 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	5.63 W/kg \pm 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	53.6 Ω - 1.9 j Ω
Return Loss	- 28.2 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	49.8 Ω - 4.7 j Ω
Return Loss	- 26.6 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.035 ns
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After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
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DASY5 Validation Report for Head TSL

Date: 11.03.2020

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 750 MHz; Type: D750V3; Serial: D750V3 - SN:1054

Communication System: UID 0 - CW; Frequency: 750 MHz

Medium parameters used: $f = 750$ MHz; $\sigma = 0.88$ S/m; $\epsilon_r = 42.5$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(10.07, 10.07, 10.07) @ 750 MHz; Calibrated: 31.12.2019
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 27.12.2019
- Phantom: Flat Phantom 4.9 (front); Type: QD 00L P49 AA; Serial: 1001
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Dipole Calibration for Head Tissue/Pin=250 mW, d=15mm/Zoom Scan (7x7x7)/Cube 0:

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

Reference Value = 59.98 V/m; Power Drift = -0.01 dB

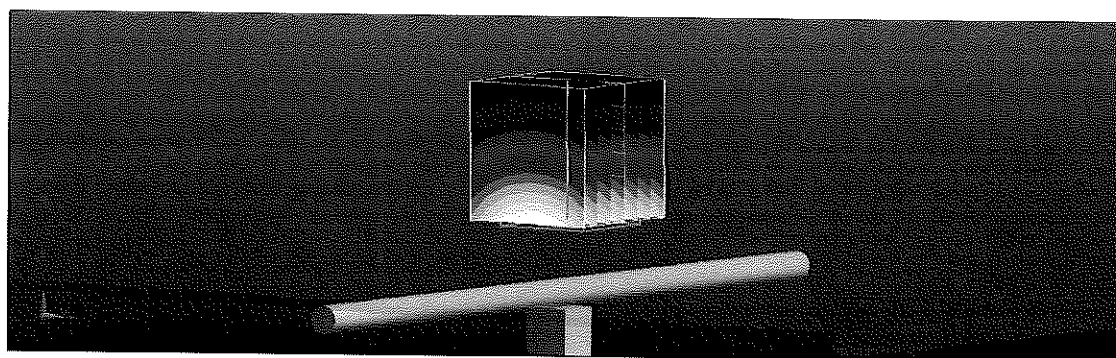
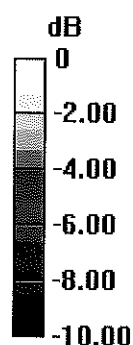
Peak SAR (extrapolated) = 3.19 W/kg

SAR(1 g) = 2.13 W/kg; SAR(10 g) = 1.41 W/kg

Smallest distance from peaks to all points 3 dB below = 17.1 mm

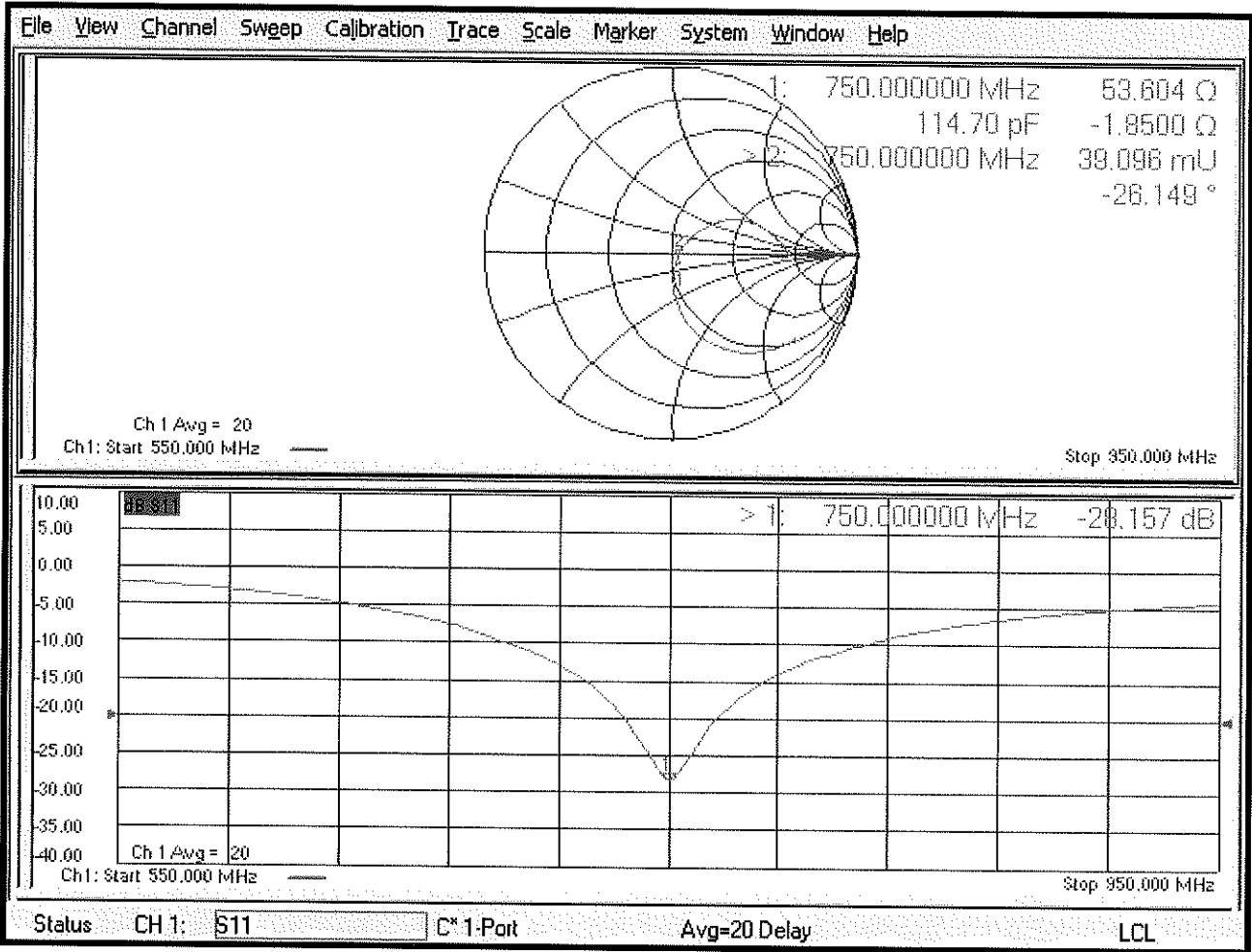
Ratio of SAR at M2 to SAR at M1 = 66.8%

Maximum value of SAR (measured) = 2.82 W/kg



0 dB = 2.82 W/kg = 4.50 dBW/kg

Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 11.03.2020

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 750 MHz; Type: D750V3; Serial: D750V3 - SN:1054

Communication System: UID 0 - CW; Frequency: 750 MHz

Medium parameters used: $f = 750$ MHz; $\sigma = 0.96$ S/m; $\epsilon_r = 54.7$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(10.61, 10.61, 10.61) @ 750 MHz; Calibrated: 31.12.2019
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 27.12.2019
- Phantom: Flat Phantom 4.9 (Back); Type: QD 00R P49 AA; Serial: 1005
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Dipole Calibration for Body Tissue/Pin=250 mW, d=15mm/Zoom Scan (7x7x7)/Cube 0:

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

Reference Value = 56.15 V/m; Power Drift = -0.02 dB

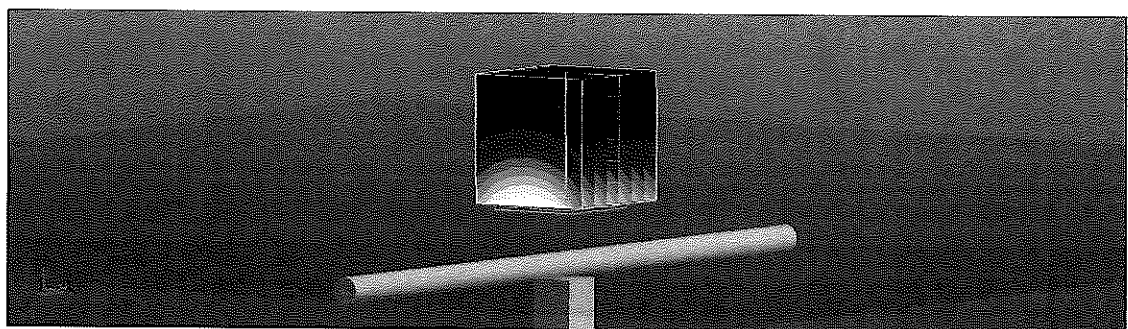
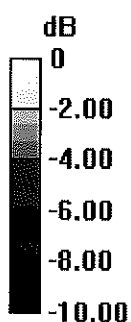
Peak SAR (extrapolated) = 3.22 W/kg

SAR(1 g) = 2.14 W/kg; SAR(10 g) = 1.41 W/kg

Smallest distance from peaks to all points 3 dB below = 16.1 mm

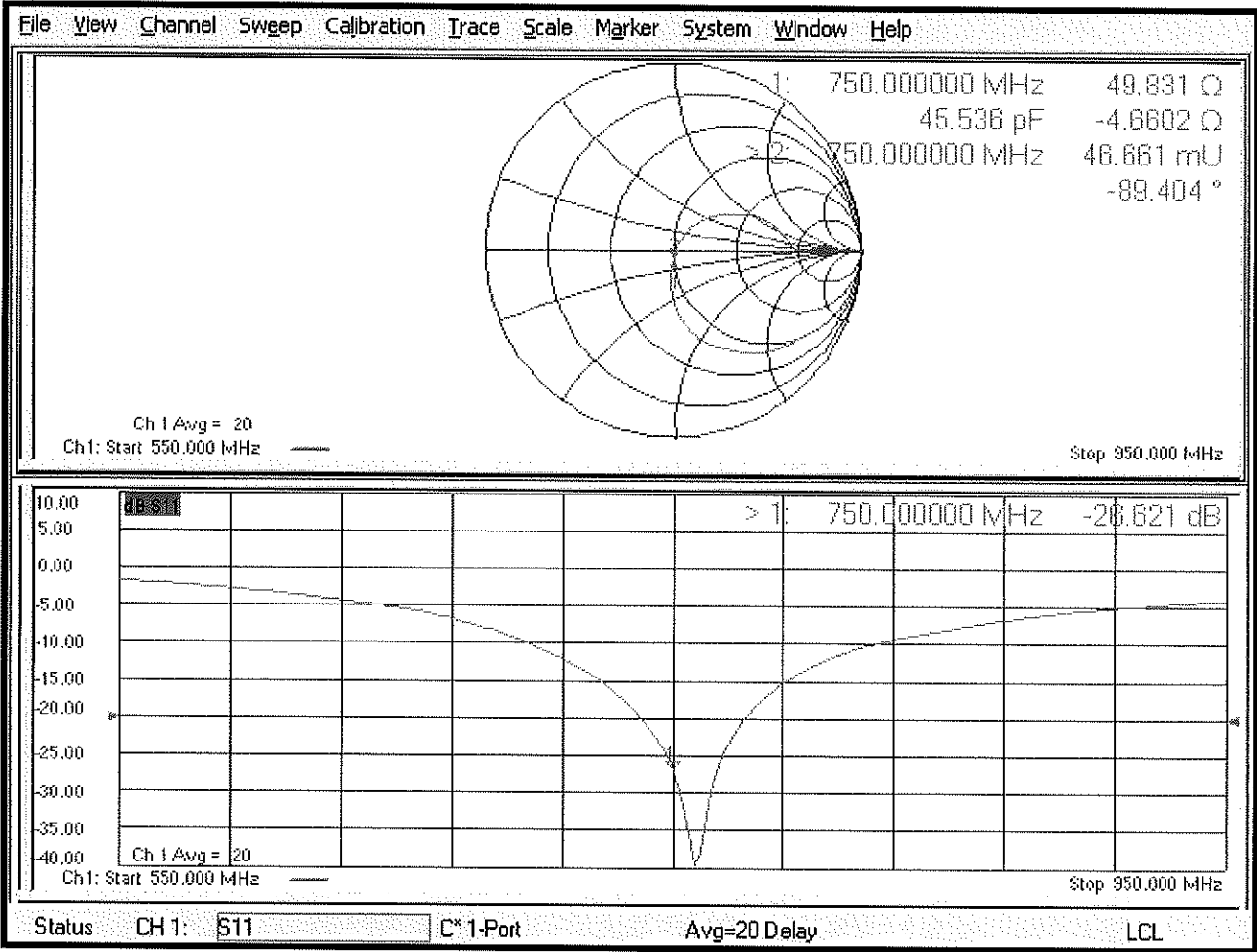
Ratio of SAR at M2 to SAR at M1 = 66.7%

Maximum value of SAR (measured) = 2.85 W/kg



0 dB = 2.85 W/kg = 4.55 dBW/kg

Impedance Measurement Plot for Body TSL



Appendix: Transfer Calibration at Four Validation Locations on SAM Head¹

Evaluation Condition

Phantom	SAM Head Phantom	For usage with cSAR3DV2-R/L
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SAR result with SAM Head (Top \cong C0)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR for nominal Head TSL parameters	normalized to 1W	7.66 W/kg \pm 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR for nominal Head TSL parameters	normalized to 1W	5.14 W/kg \pm 16.9 % (k=2)

SAR result with SAM Head (Mouth \cong F90)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR for nominal Head TSL parameters	normalized to 1W	8.42 W/kg \pm 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR for nominal Head TSL parameters	normalized to 1W	5.69 W/kg \pm 16.9 % (k=2)

SAR result with SAM Head (Neck \cong H0)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR for nominal Head TSL parameters	normalized to 1W	7.89 W/kg \pm 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR for nominal Head TSL parameters	normalized to 1W	5.40 W/kg \pm 16.9 % (k=2)

SAR result with SAM Head (Ear \cong D90)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR for nominal Head TSL parameters	normalized to 1W	6.82 W/kg \pm 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR for nominal Head TSL parameters	normalized to 1W	4.63 W/kg \pm 16.9 % (k=2)

¹ Additional assessments outside the current scope of SCS 0108



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

Accreditation No.: **SCS 0108**

Client **PC Test**

Certificate No: **D1765V2-1008 May18**

CALIBRATION CERTIFICATE

Object **D1765V2 - SN-1008**

Calibration procedure(s) **QA CAL-05.v10**
Calibration procedure for dipole validation kits above 700 MHz

Calibration date: **May 23, 2018**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-18 (No. 217-02672/02673)	Apr-19
Power sensor NRP-Z91	SN: 103244	04-Apr-18 (No. 217-02672)	Apr-19
Power sensor NRP-Z91	SN: 103245	04-Apr-18 (No. 217-02673)	Apr-19
Reference 20 dB Attenuator	SN: 5058 (20k)	04-Apr-18 (No. 217-02682)	Apr-19
Type-N mismatch combination	SN: 5047.2 / 06327	04-Apr-18 (No. 217-02683)	Apr-19
Reference Probe EX3DV4	SN: 7349	30-Dec-17 (No. EX3-7349_Dec17)	Dec-18
DAE4	SN: 601	26-Oct-17 (No. DAE4-601_Oct17)	Oct-18
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter EPM-442A	SN: GB97480704	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
Power sensor HP 8481A	SN: MY41092317	07-Oct-15 (in house check Oct-16)	In house check: Oct-18
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-16)	In house check: Oct-18
Network Analyzer HP 8753E	SN: US37390585	18-Oct-01 (in house check Oct-17)	In house check: Oct-18

	Name	Function	Signature
Calibrated by:	Manu Seitz	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: May 23, 2018

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

BNV
7/16/2018
BNV
05/20/2019
BNV
05/29/2020
Extended



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions:** Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:** The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss:** These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay:** One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured:** SAR measured at the stated antenna input power.
- SAR normalized:** SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:** The measured TSL parameters are used to calculate the nominal SAR result.

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

Measurement Conditions

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

DASY Version	DASY5	V52.10.1
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5.0 mm	
Frequency	1750 MHz \pm 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	40.1	1.37 mho/m
Measured Head TSL parameters	(22.0 \pm 0.2) °C	39.0 \pm 6 %	1.34 mho/m \pm 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	8.94 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	36.2 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	4.71 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	19.0 W/kg \pm 16.5 % (k=2)

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	53.4	1.49 mho/m
Measured Body TSL parameters	(22.0 \pm 0.2) °C	53.2 \pm 6 %	1.46 mho/m \pm 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm ³ (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	9.21 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	37.4 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Body TSL	condition	
SAR measured	250 mW input power	4.92 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	19.9 W/kg \pm 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	47.7 Ω - 6.5 j Ω
Return Loss	- 23.0 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	43.3 Ω - 6.0 j Ω
Return Loss	- 20.3 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.210 ns
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After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
Manufactured on	October 06, 2005

Appendix (Additional assessments outside the scope of SCS 0108)

Measurement Conditions

DASY system configuration, as far as not given on page 1 and 3.

Phantom	SAM Head Phantom	For usage with cSAR3DV2-R/L
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SAR result with SAM Head (Top)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	9.26 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	37.4 W/kg ± 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	4.95 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	19.9 W/kg ± 16.9 % (k=2)

SAR result with SAM Head (Mouth)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	9.47 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	38.2 W/kg ± 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	5.06 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	20.4 W/kg ± 16.9 % (k=2)

SAR result with SAM Head (Neck)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	9.26 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	37.4 W/kg ± 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	5.02 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	20.2 W/kg ± 16.9 % (k=2)

SAR result with SAM Head (Ear)

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	7.12 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	28.7 W/kg ± 17.5 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	4.01 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	16.1 W/kg ± 16.9 % (k=2)

DASY5 Validation Report for Head TSL

Date: 15.05.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 1765 MHz; Type: D1765V2; Serial: D1765V2 - SN:1008

Communication System: UID 0 - CW; Frequency: 1750 MHz

Medium parameters used: $f = 1750$ MHz; $\sigma = 1.34$ S/m; $\epsilon_r = 39$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.5, 8.5, 8.5) @ 1750 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

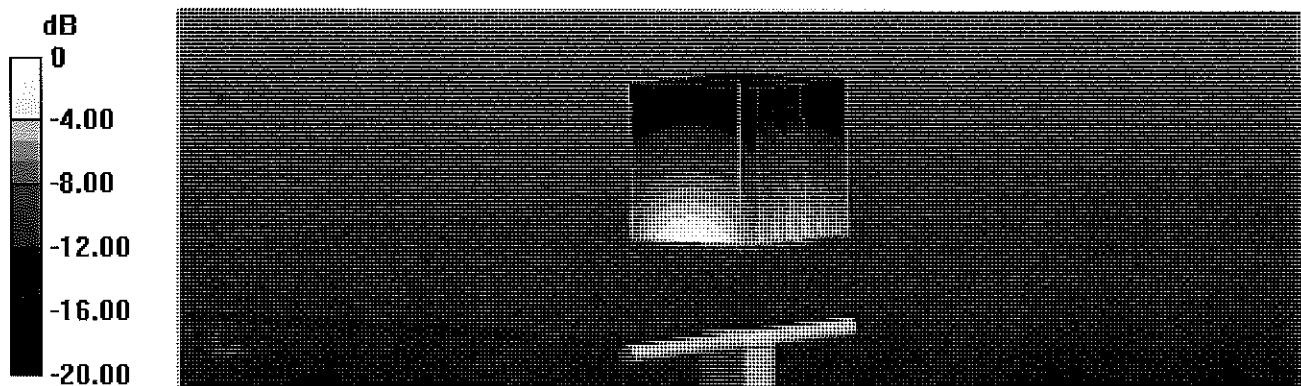
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 106.6 V/m; Power Drift = -0.02 dB

Peak SAR (extrapolated) = 16.4 W/kg

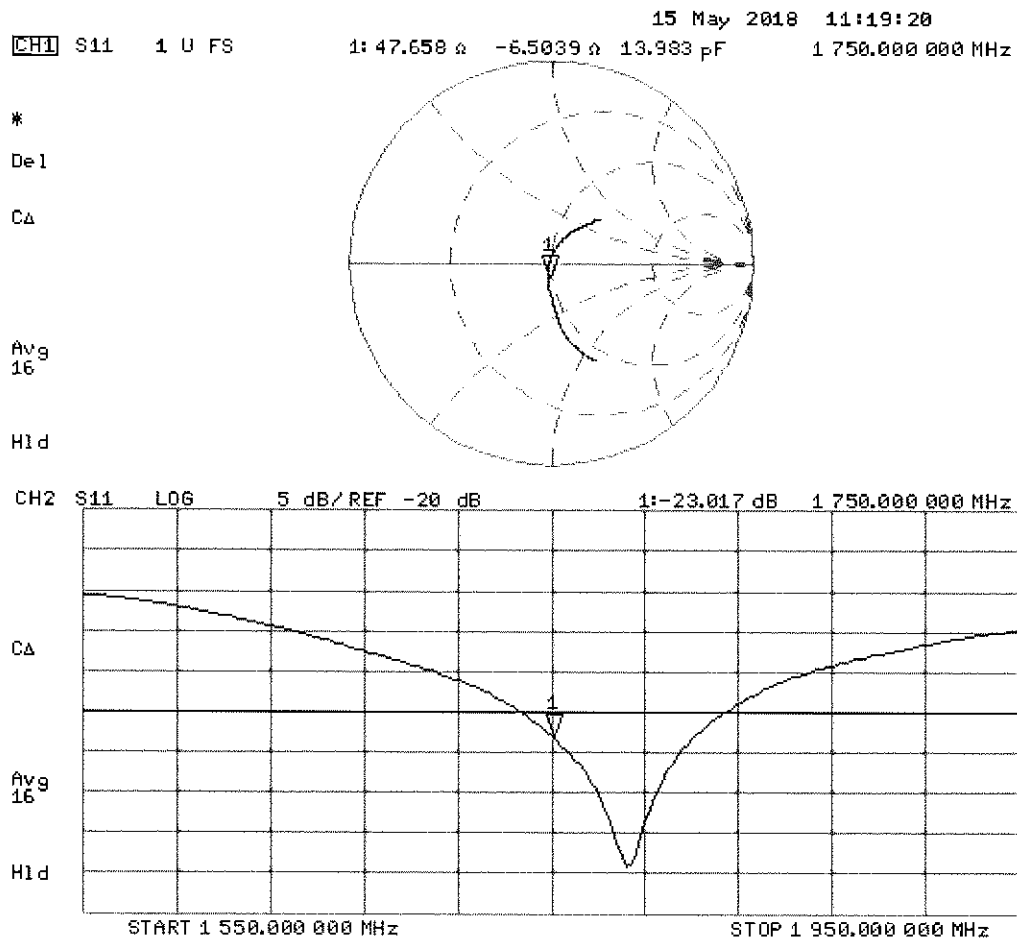
SAR(1 g) = 8.94 W/kg; SAR(10 g) = 4.71 W/kg

Maximum value of SAR (measured) = 13.8 W/kg



0 dB = 13.8 W/kg = 11.40 dBW/kg

Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 15.05.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 1765 MHz; Type: D1765V2; Serial: D1765V2 - SN:1008

Communication System: UID 0 - CW; Frequency: 1750 MHz

Medium parameters used: $f = 1750$ MHz; $\sigma = 1.46$ S/m; $\epsilon_r = 53.2$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.35, 8.35, 8.35) @ 1750 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: Flat Phantom 5.0 (back); Type: QD 000 P50 AA; Serial: 1002
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

Dipole Calibration for Body Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

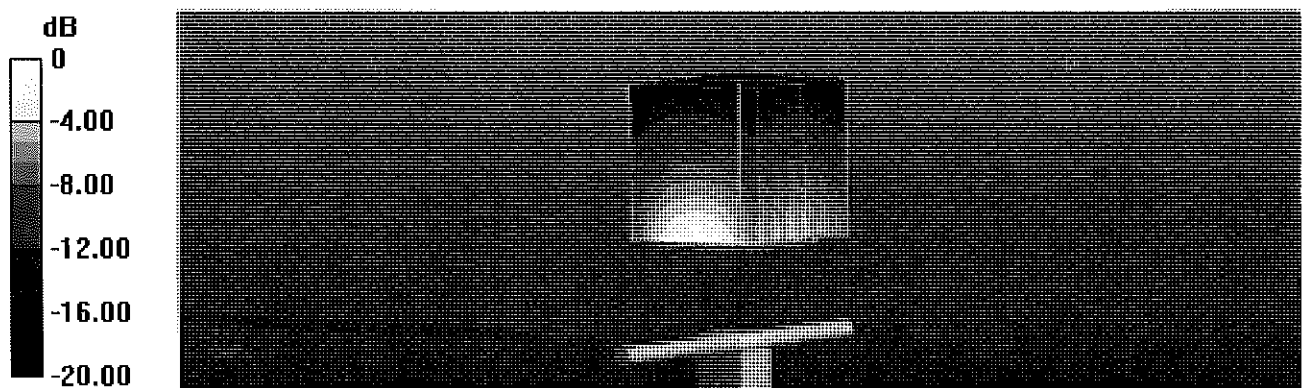
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 102.4 V/m; Power Drift = -0.06 dB

Peak SAR (extrapolated) = 16.1 W/kg

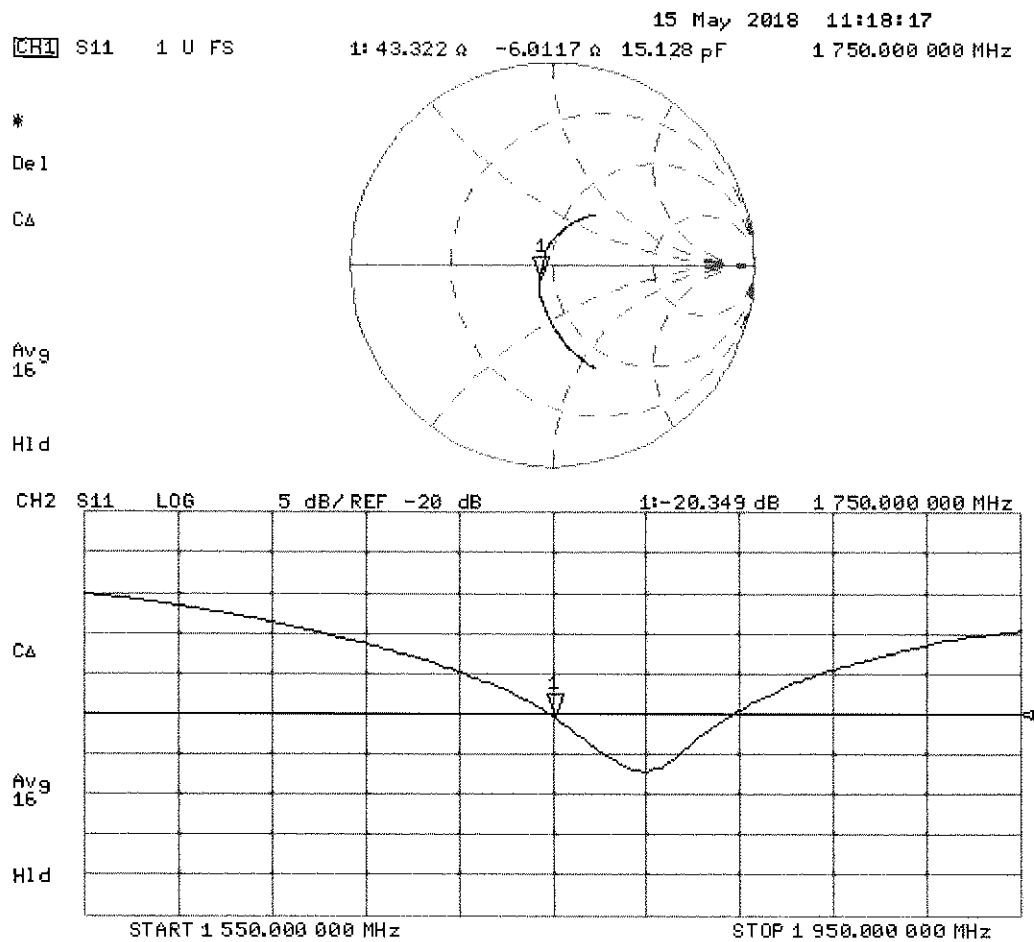
SAR(1 g) = 9.21 W/kg; SAR(10 g) = 4.92 W/kg

Maximum value of SAR (measured) = 13.7 W/kg



0 dB = 13.7 W/kg = 11.37 dBW/kg

Impedance Measurement Plot for Body TSL



DASY5 Validation Report for SAM Head

Date: 23.05.2018

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 1765 MHz; Type: D1765V2; Serial: D1765V2 - SN:1008

Communication System: UID 0 - CW; Frequency: 1750 MHz

Medium parameters used: $f = 1750$ MHz; $\sigma = 1.37$ S/m; $\epsilon_r = 41.8$; $\rho = 1000$ kg/m³

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.5, 8.5, 8.5) @ 1750 MHz; Calibrated: 30.12.2017
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 26.10.2017
- Phantom: SAM Head
- DASY52 52.10.1(1476); SEMCAD X 14.6.11(7439)

SAM/Head/Top/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 105.8 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 16.4 W/kg

SAR(1 g) = 9.26 W/kg; SAR(10 g) = 4.95 W/kg

Maximum value of SAR (measured) = 13.9 W/kg

SAM/Head/Mouth/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 104.2 V/m; Power Drift = -0.04 dB

Peak SAR (extrapolated) = 16.6 W/kg

SAR(1 g) = 9.47 W/kg; SAR(10 g) = 5.06 W/kg

Maximum value of SAR (measured) = 13.7 W/kg

SAM/Head/Neck/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 104.7 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 15.8 W/kg

SAR(1 g) = 9.26 W/kg; SAR(10 g) = 5.02 W/kg

Maximum value of SAR (measured) = 13.8 W/kg

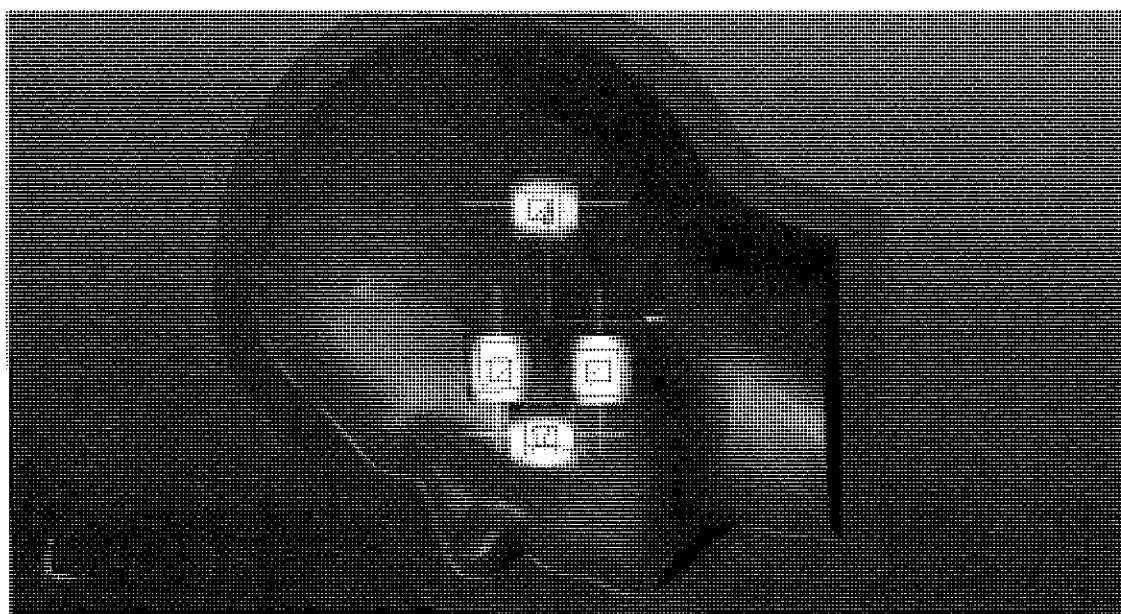
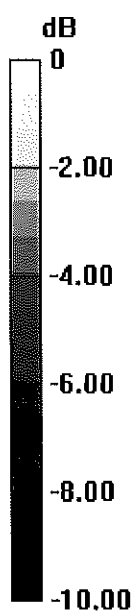
SAM/Head/Ear/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 90.46 V/m; Power Drift = -0.02 dB

Peak SAR (extrapolated) = 11.8 W/kg

SAR(1 g) = 7.12 W/kg; SAR(10 g) = 4.01 W/kg

Maximum value of SAR (measured) = 10.3 W/kg



0 dB = 10.3 W/kg = 10.13 dBW/kg

Certification of Calibration

Object D1765V2 – SN: 1008

Calibration procedure(s) Procedure for Calibration Extension for SAR Dipoles.

Extension Calibration date: 5/17/2019

Description: SAR Validation Dipole at 1750 MHz.

Calibration Equipment used:

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8753ES	S-Parameter Network Analyzer	3/11/2019	Annual	3/11/2020	US39170122
Agilent	N5182A	MXG Vector Signal Generator	11/28/2018	Annual	11/28/2019	MY47420603
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433971
Anritsu	MA2411B	Pulse Power Sensor	11/20/2018	Annual	11/20/2019	1027293
Anritsu	MA2411B	Pulse Power Sensor	10/30/2018	Annual	10/30/2019	1126066
Anritsu	ML2495A	Power Meter	10/21/2018	Annual	10/21/2019	941001
Control Company	4040	Therm./ Clock/ Humidity Monitor	10/9/2018	Biennial	10/9/2020	181647811
Control Company	4352	Ultra Long Stem Thermometer	6/6/2018	Biennial	6/6/2020	181334678
Keysight	772D	Dual Directional Coupler	CBT	N/A	CBT	MY52180215
Keysight Technologies	85033E	Standard Mechanical Calibration Kit (DC to 9GHz, 3.5mm)	6/4/2018	Annual	6/4/2019	MY53401181
MiniCircuits	VLF-6000+	Low Pass Filter	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Pasternack	PE2209-10	Bidirectional Coupler	CBT	N/A	CBT	N/A
Seekonk	NC-100	Torque Wrench	7/11/2018	Annual	7/11/2019	N/A
SPEAG	EX3DV4	SAR Probe	6/25/2018	Annual	6/25/2019	7409
SPEAG	DAE4	Dasy Data Acquisition Electronics	6/18/2018	Annual	6/18/2019	1334
SPEAG	EX3DV4	SAR Probe	2/19/2019	Annual	2/19/2020	3914
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/14/2019	Annual	2/14/2020	1272
SPEAG	DAK-3.5	Dielectric Assessment Kit	9/11/2018	Annual	9/11/2019	1091

Measurement Uncertainty = $\pm 23\%$ (k=2)

	Name	Function	Signature
Calibrated By:	Brodie Halfoster	Test Engineer	<i>BRODIE HALFOSTER</i>
Approved By:	Kaitlin O'Keefe	Senior Technical Manager	<i>KOK</i>

DIPOLE CALIBRATION EXTENSION

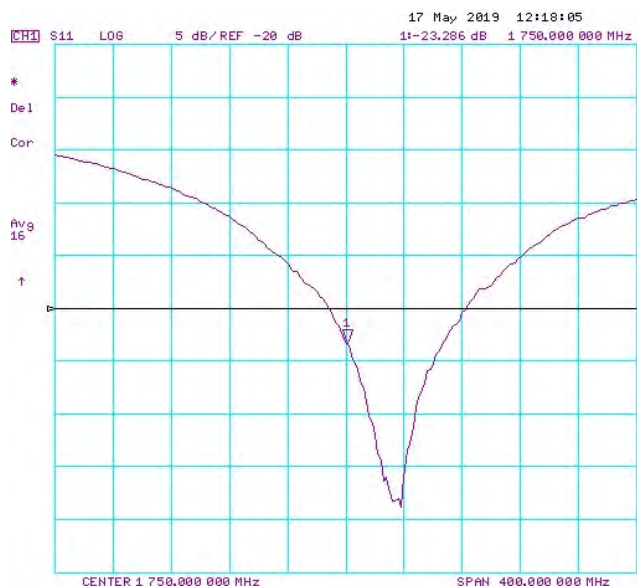
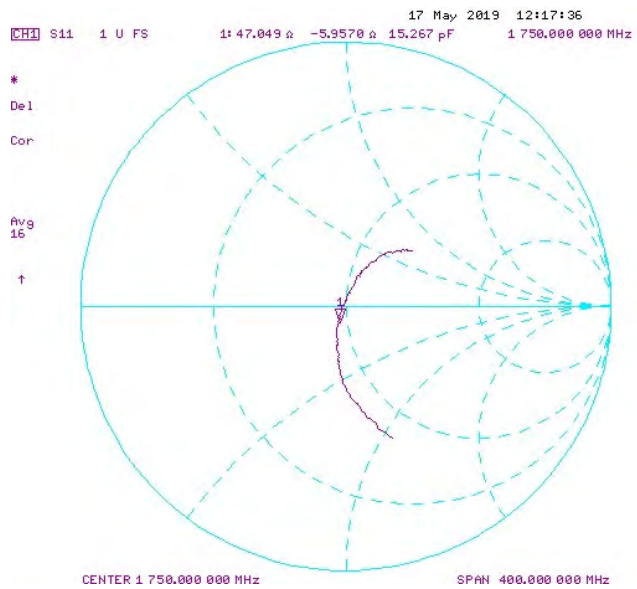
Per KDB 865664 D01, calibration intervals of up to three years may be considered for reference dipoles when it is demonstrated that the SAR target, impedance and return loss of a dipole have remained stable according to the following requirements:

1. The measured SAR does not deviate more than 10% from the target on the calibration certificate.
2. The return-loss does not deviate more than 20% from the previous measurement and meets the required 20dB minimum return-loss requirement.
3. The measurement of real or imaginary parts of impedance does not deviate more than 5Ω from the previous measurement.

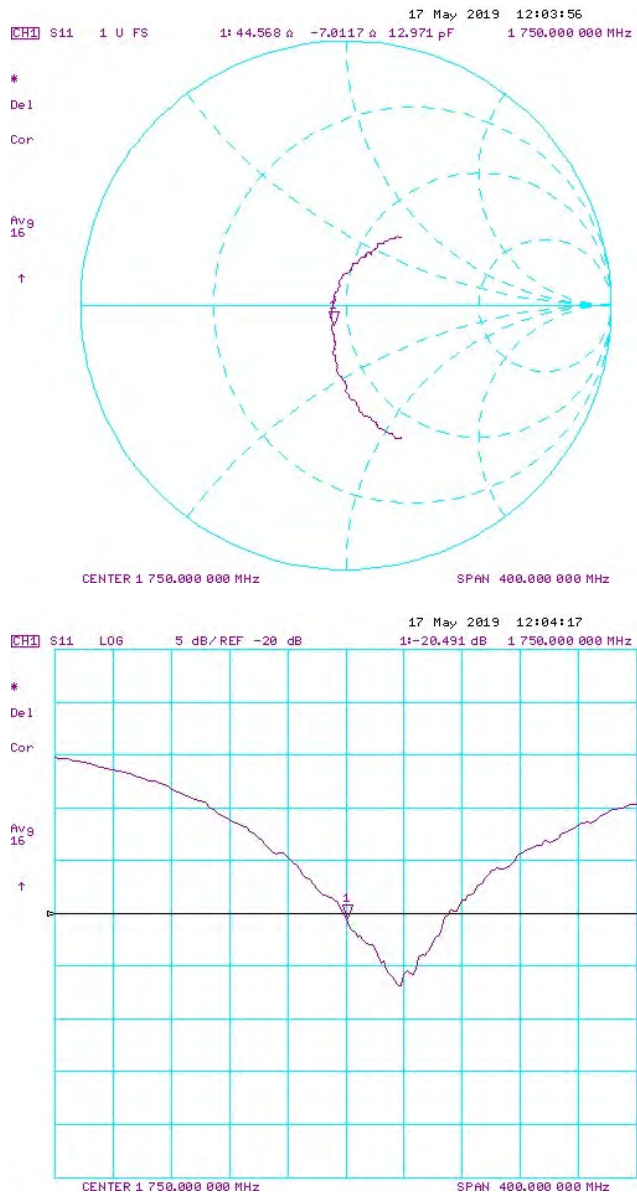
The following dipole was checked to pass the above 3 requirements to have 2-year calibration period from the calibration date:

Calibration Date	Extension Date	Certificate Electrical Delay (ns)	Certificate SAR Target Head (1g) W/kg @ 20.0 dBm	Measured Head SAR (1g) W/kg @ 20.0 dBm	Deviation 1g (%)	Certificate SAR Target Head (10g) W/kg @ 20.0 dBm	Measured Head SAR (10g) W/kg @ 20.0 dBm	Deviation 10g (%)	Certificate Impedance Head (Ohm) Real	Measured Impedance Head (Ohm) Real	Difference (Ohm) Real	Certificate Impedance Head (Ohm) Imaginary	Measured Impedance Head (Ohm) Imaginary	Difference (Ohm) Imaginary	Certificate Return Loss Head (dB)	Measured Return Loss Head (dB)	Deviation (%)	PASS/FAIL
5/23/2018	5/17/2019	1.21	3.62	3.63	0.28%	1.9	1.92	1.05%	47.7	47	0.7	-6.5	-6	0.5	-23	-23.3	-1.20%	PASS
Calibration Date	Extension Date	Certificate Electrical Delay (ns)	Certificate SAR Target Body (1g) W/kg @ 20.0 dBm	Measured Body SAR (1g) W/kg @ 20.0 dBm	Deviation 1g (%)	Certificate SAR Target Body (10g) W/kg @ 20.0 dBm	Measured Body SAR (10g) W/kg @ 20.0 dBm	Deviation 10g (%)	Certificate Impedance Body (Ohm) Real	Measured Impedance Body (Ohm) Real	Difference (Ohm) Real	Certificate Impedance Body (Ohm) Imaginary	Measured Impedance Body (Ohm) Imaginary	Difference (Ohm) Imaginary	Certificate Return Loss Body (dB)	Measured Return Loss Body (dB)	Deviation (%)	PASS/FAIL
5/23/2018	5/17/2019	1.21	3.74	3.95	5.61%	1.99	2.08	4.52%	43.3	44.6	1.3	-6	-7	1	-20.3	-20.5	-0.90%	PASS

Impedance & Return-Loss Measurement Plot for Head TSL



Impedance & Return-Loss Measurement Plot for Body TSL



Certification of Calibration

Object: D1765V2 – SN: 1008

Calibration procedure(s): Procedure for Calibration Extension for SAR Dipoles.

Extension Calibration date: 5/23/2020

Description: SAR Validation Dipole at 1750 MHz.

Calibration Equipment used:

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Control Company	4040	Therm./Clock/Humidity Monitor	6/29/2019	Biennial	6/29/2021	192291470
Control Company	4352	Ultra Long Stem Thermometer	8/2/2018	Biennial	8/2/2020	181334684
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433971
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Keysight Technologies	85033E	Standard Mechanical Calibration Kit (DC to 9GHz, 3.5mm)	7/2/2019	Annual	7/2/2020	MY53401181
Rohde & Schwarz	ZNLE6	Vector Network Analyzer	10/11/2019	Annual	10/11/2020	101307
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
SPEAG	DAKS-3.5	Portable DAK	9/10/2019	Annual	9/10/2020	1045
Anritsu	MA2411B	Pulse Power Sensor	8/14/2019	Annual	8/14/2020	1315051
Anritsu	MA2411B	Pulse Power Sensor	8/8/2019	Annual	8/8/2020	1339008
Anritsu	ML2495A	Power Meter	12/17/2019	Annual	12/17/2020	941001
Agilent	N5182A	MXG Vector Signal Generator	8/19/2019	Annual	8/19/2020	MY47420837
Seekonk	NC-100	Torque Wrench (8" lb)	5/23/2018	Biennial	5/23/2020	22217
MiniCircuits	ZHDC-16-63-S+	Bidirectional Coupler	CBT	N/A	CBT	N/A
MiniCircuits	VLF-6000+	Low Pass Filter	CBT	N/A	CBT	N/A
SPEAG	EX3DV4	SAR Probe	4/21/2020	Annual	4/21/2021	7357
SPEAG	EX3DV4	SAR Probe	7/16/2019	Annual	7/16/2020	7410
SPEAG	DAE4	Dasy Data Acquisition Electronics	7/11/2019	Annual	7/11/2020	1322
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/12/2020	Annual	3/12/2021	1368

Measurement Uncertainty = $\pm 23\%$ (k=2)

	Name	Function	Signature
Calibrated By:	Brodie Halfoster	Test Engineer	<i>BRODIE HALFOSTER</i>
Approved By:	Kaitlin O'Keefe	Senior Technical Manager	<i>KOK</i>

DIPOLE CALIBRATION EXTENSION

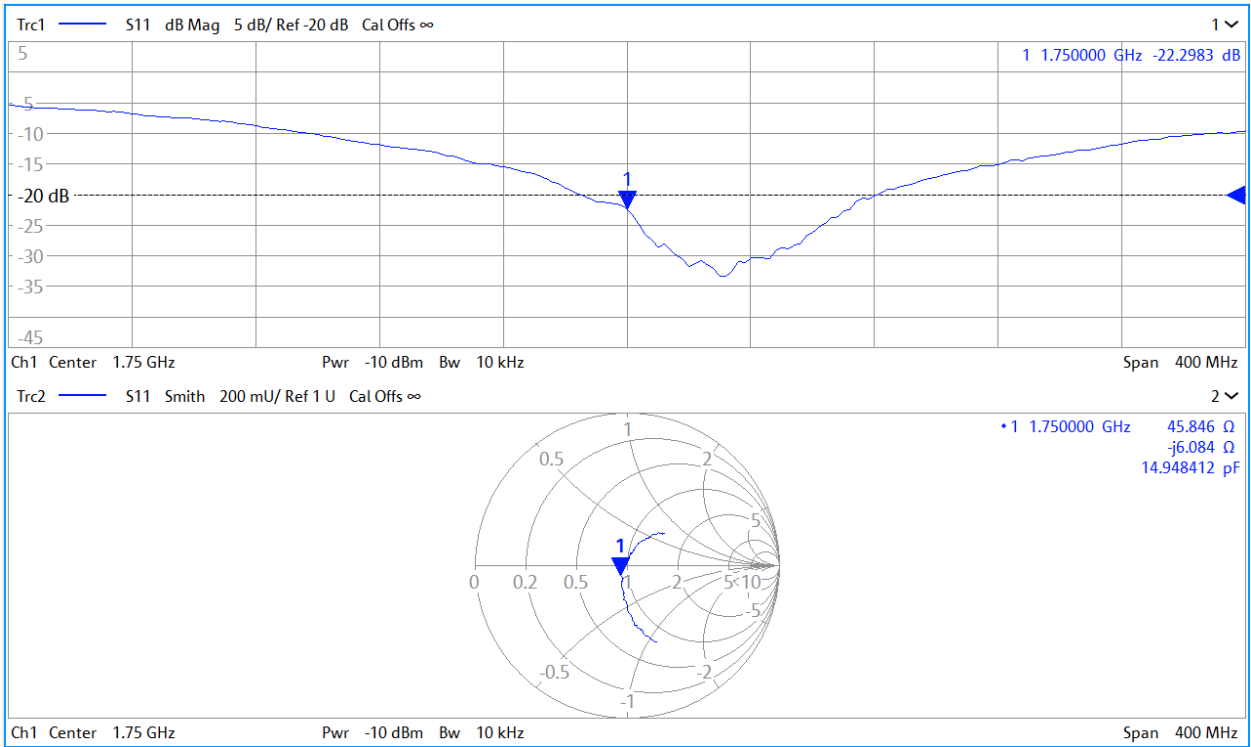
Per KDB 865664 D01, calibration intervals of up to three years may be considered for reference dipoles when it is demonstrated that the SAR target, impedance and return loss of a dipole have remained stable according to the following requirements:

1. The measured SAR does not deviate more than 10% from the target on the calibration certificate.
2. The return-loss does not deviate more than 20% from the previous measurement and meets the required 20dB minimum return-loss requirement.
3. The measurement of real or imaginary parts of impedance does not deviate more than 5Ω from the previous measurement.

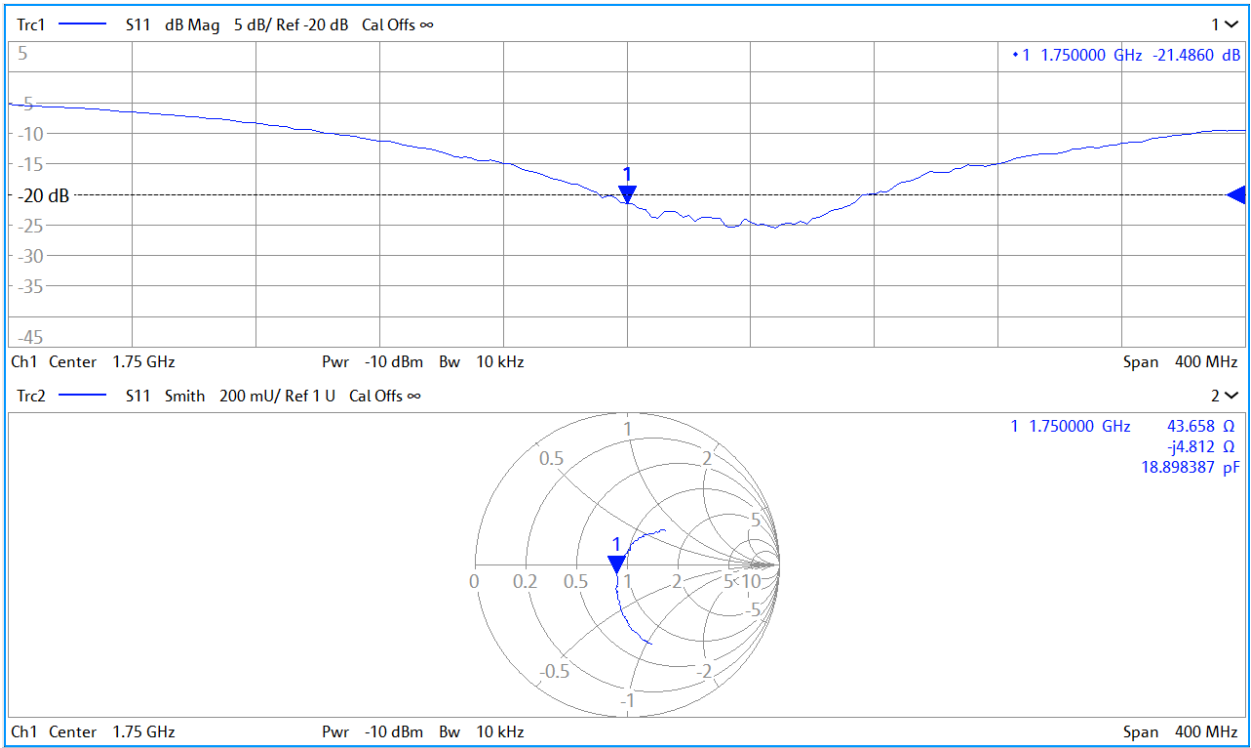
The following dipole was checked to pass the above 3 requirements to have 3-year calibration period from the calibration date:

Calibration Date	Extension Date	Certificate Electrical Delay (ns)	Certificate SAR Target Head (1g) W/kg @ 20.0 dBm	Measured Head SAR (1g) W/kg @ 20.0 dBm	Deviation 1g (%)	Certificate SAR Target Head (10g) W/kg @ 20.0 dBm	Measured Head SAR (10g) W/kg @ 20.0 dBm	Deviation 10g (%)	Certificate Impedance Head (Ohm) Real	Measured Impedance Head (Ohm) Real	Difference (Ohm) Real	Certificate Impedance Head (Ohm) Imaginary	Measured Impedance Head (Ohm) Imaginary	Difference (Ohm) Imaginary	Certificate Return Loss Head (dB)	Measured Return Loss Head (dB)	Deviation (%)	PASS/FAIL
5/23/2018	5/23/2020	1.21	3.62	3.65	0.83%	1.90	1.94	2.11%	47.7	45.9	1.9	-6.5	-6.1	0.4	-23	-22.3	3.10%	PASS
Calibration Date	Extension Date	Certificate Electrical Delay (ns)	Certificate SAR Target Body (1g) W/kg @ 20.0 dBm	Measured Body SAR (1g) W/kg @ 20.0 dBm	Deviation 1g (%)	Certificate SAR Target Body (10g) W/kg @ 20.0 dBm	Measured Body SAR (10g) W/kg @ 20.0 dBm	Deviation 10g (%)	Certificate Impedance Body (Ohm) Real	Measured Impedance Body (Ohm) Real	Difference (Ohm) Real	Certificate Impedance Body (Ohm) Imaginary	Measured Impedance Body (Ohm) Imaginary	Difference (Ohm) Imaginary	Certificate Return Loss Body (dB)	Measured Return Loss Body (dB)	Deviation (%)	PASS/FAIL
5/23/2018	5/23/2020	1.21	3.74	4.00	6.95%	1.99	2.12	6.53%	43.3	43.7	0.4	-6.0	-4.8	1.2	-20.3	-21.5	-5.90%	PASS

Impedance & Return-Loss Measurement Plot for Head TSL



Impedance & Return-Loss Measurement Plot for Body TSL





Accredited by the Swiss Accreditation Service (SAS)

Accreditation No.: **SCS 0108**

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Client **PC Test**

Certificate No: **EX3-7547_Aug20**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:7547**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-23.v5, QA CAL-25.v7**
Calibration procedure for dosimetric E-field probes

Calibration date: **August 19, 2020**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	01-Apr-20 (No. 217-03100/03101)	Apr-21
Power sensor NRP-Z91	SN: 103244	01-Apr-20 (No. 217-03100)	Apr-21
Power sensor NRP-Z91	SN: 103245	01-Apr-20 (No. 217-03101)	Apr-21
Reference 20 dB Attenuator	SN: CC2552 (20x)	31-Mar-20 (No. 217-03106)	Apr-21
DAE4	SN: 660	27-Dec-19 (No. DAE4-660_Dec19)	Dec-20
Reference Probe ES3DV2	SN: 3013	31-Dec-19 (No. ES3-3013_Dec19)	Dec-20
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-20)	In house check: Jun-22
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-19)	In house check: Oct-20

Calibrated by:	Name Claudio Leubler	Function Laboratory Technician	Signature
Approved by:	Name Katja Pokovic	Technical Manager	
This calibration certificate shall not be reproduced except in full without written approval of the laboratory.			
Issued: August 20, 2020			