



Test report No.: 23C0129R-SAUSV01S-A

SAR Test Report

Product Name	Flipper Handheld
Trademark	Commcrete
Model and /or type reference	HTS-100
Applicant's name / address	Commcrete Ltd Shaked 11, Shoham 7319900, Israel
Manufacturer's name	Commcrete Ltd
FCC ID	2BBUK-FLIPPERHTS100
Applicable Standard	IEEE 1528-2013 KDB 447498 D01 v06 KDB 865664 D01 v01r04
Test Result	Max. SAR Measurement (1g) 1.64 GHz: 1.083 W/kg
Verdict Summary	IN COMPLIANCE
Documented By (Supervisor / Jinn Chen)	
Tested By (Senior Engineer / Luke Cheng)	
Approved By (Assistant Manager / San Lin)	
Date of Receipt	2023/12/05
Date of Issue	2024/08/06
Report Version	V1.0

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Competences and Guarantees

DEKRA is a testing laboratory competent to carry out the tests described in this report.

In order to assure the traceability to other national and international laboratories, DEKRA has a calibration and maintenance program for its measurement equipment.

DEKRA guarantees the reliability of the data presented in this report, which is the result of the measurements and the tests performed to the item under test on the date and under the conditions stated in the report and it is based on the knowledge and technical facilities available at DEKRA at the time of performance of the test.

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5. Measurement uncertainties evaluated for each testing system and associated connections are given here to provide the system information for reference. Compliance determinations do not take into account measurement uncertainties for each testing system, but are based on the results of the compliance measurement.

Revision History

Report No.	Version	Description	Issued Date
23C0129R-SAUSV01S-A	V1.0	Initial issue of report.	2024/08/06

1. General Information

1.1 EUT Description

Product Name	Flipper Handheld
Trademark	Commcrete
Model and /or type reference	HTS-100
FCC ID	2BBUK-FLIPPERHTS100
Frequency Range	F1:1626.5MHz, F4:1660.5MHz
Type of Modulation	GMSK
Antenna Type	Omni Directional Single Patch
Device Category	Portable
RF Exposure Environment	Uncontrolled

Note: F1 and F4 are EUT working bands – Satellite F1 Rx 1525 MHz/ Tx 1626.5 MHz; Satellite F4 Rx 1559 MHz/ Tx 1660.5 MHz .

1.2 Antenna List

No.	Manufacturer	Part No.	Antenna Type	Peak Gain
1	Commcrete Ltd.	PA45-1592-175SA	Omni Directional Single Patch	0 dBi for 1626.5-1660.5 MHz

Note: The above EUT information by manufacturer.

1.3 Test Environment

Ambient conditions in the laboratory:

Test Date: 2024/06/25

Items	Required	Actual
Temperature (°C)	18-25	23 ± 2
Humidity (%RH)	30-70	50 ± 20

USA	FCC Designation Number: TW0033
Canada	CAB Identifier Number: TW3023 / Company Number: 26930

Site Description	Accredited by TAF
	Accredited Number: 3023

Test Laboratory	DEKRA Testing and Certification Co., Ltd. Linkou Laboratory
Address	No.5-22, Ruishukeng Linkou District, New Taipei City, 24451, Taiwan, R.O.C
Performed Location	No. 26, Huaya 1st Rd., Guishan Dist., Taoyuan City 333411, Taiwan, R.O.C.
Phone Number	+886-3-275-7255
Fax Number	+886-3-327-8031

1.4 Measurement procedures

IEEE 1528-2013

47CFR § 2.1093

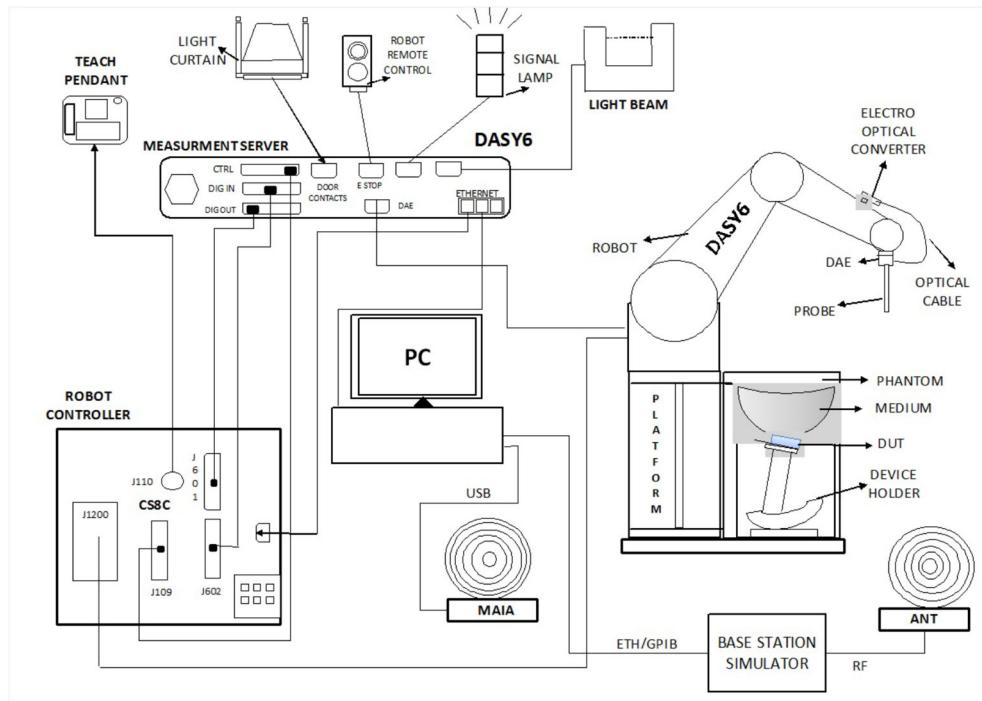
KDB 447498 D01 v06

KDB 865664 D01 v01r04

2. SAR Measurement System

2.1 DASY System Description

SAR Configurations is shown below:



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

- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7/8/10 and the DASY software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

2.2 Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

When an Area Scan has measured all reachable points, it computes the field maxima found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing.

2.2.1 Zoom Scan (Cube Scan Averaging)

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1 g cube is 10mm, with the side length of the 10 g cube 21,5mm.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5x5x7 (8mmx8mmx5mm) providing a volume of 32mm in the X & Y axis, and 30mm in the Z axis.

2.2.2 SAR measurement drifts

Before an area scan and after the zoom scan, single point SAR measurements are performed at defined locations to estimate the SAR measurement drift due to device output power variations. If a device is known to drift randomly, additional single point drift reference measurements should be performed at regular intervals throughout the area and zoom scan test durations. The SAR drift shall be kept within $\pm 5\%$, whether there are substantial drifts or not. The field difference will be calculated in dB units in the DASY software.

2.2.3 Uncertainty of Inter-/Extrapolation and Averaging

In order to evaluate the uncertainty of the interpolation, extrapolation and averaged SAR calculation algorithms of the Postprocessor, DASY allows the generation of measurement grids which are artificially predefined by analytically based test functions. Therefore, the grids of area scans and zoom scans can be filled with uncertainty test data, according to the SAR benchmark functions.

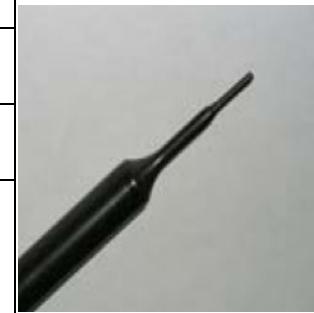
2.3 DASY E-Field Probe

The SAR measurement is conducted with the dosimetric probe manufactured by SPEAG. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

SPEAG conducts the probe calibration in compliance with international and national standards under ISO 17025. The calibration data are in Appendix D.

Isotropic E-Field Probe Specification

Model	Ex3DV4
Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Frequency	4 MHz – 10 GHz Linearity: ± 0.2 dB (30 MHz to 10 GHz)
Directivity	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μ W/g to 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.



E-Field mm-Wave Probe Specification

Model	EUmmWVx
Construction	Two dipoles optimally arranged to obtain pseudo-vector information Minimum three measurements/point, 120° rotated around probe axis Sensors (0.8 mm length) printed on glass substrate protected by high density foam
Frequency	750 MHz to 110 GHz
Dynamic Range	< 20 V/m to 10000 V/m with PRE-10 (min < 20 V/m to 2000 V/m)
Position Precision	< 0.2 mm
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: encapsulation 8 mm (internal sensor < 1mm) Distance from probe tip to dipole centers: < 2 mm Sensor displacement to probe's calibration point: < 0.3 mm
Application	E-field measurements of 5G devices and other mm-wave transmitters operating above 10GHz in < 2 mm distance from device (free-space) Power density, H-field, and far-field analysis using total field reconstruction



2.4 DATA Acquisition Electronics (DAE) and Measurement Server

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter and a command decoder and control logic unit.

Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.

The input impedance of the DAE4 is 200M Ohm; the inputs are symmetrical and floating. Common mode rejection is above 80dB.



2.5 Robot

The DASY system uses the high precision robots TX90 XL type out of the newer series from Stäubli SA (France). For the 6-axis controller DASY system, the CS8C robot controller version from Stäubli is used.

The XL robot series have many features that are important for our application:

- High precision (repeatability 0.02 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)
- 6-axis controller



2.6 Device Holder

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (EPR).

Thus the device needs no repositioning when changing the angles.

The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon_r = 3$ and loss tangent $\delta = 0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.



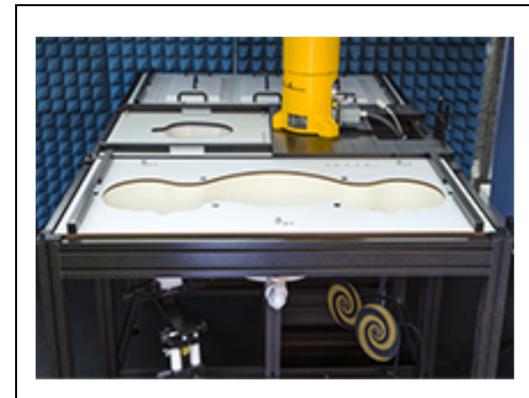
2.7 Phantom

2.7.1 SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region where shell thickness increases to 6mm).

It has three measurement areas:

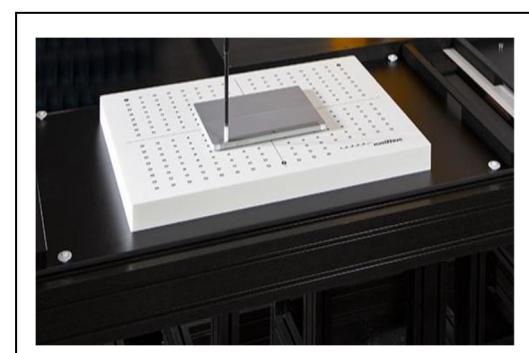
- Left head
- Right head
- Flat phantom



The device holder positions are adjusted to the standard measurement positions in the three sections. A cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

2.7.2 mmWave Phantom

The mmWave Phantom approximates free-space conditions, allowing to evaluate not only the antenna side of the device but also the front (screen) side or any opposite-radiating side of wireless devices operating above 10 GHz without distorting the RF field. It consists of a 40 mm thick Rohacell plate used as a test bed, which has a loss tangent ($\tan \delta$) ≤ 0.05 and a relative permittivity (ϵ_r) ≤ 1.2 . High-performance RF absorbers are placed below the foam.



3. Tissue Simulating Liquid

3.1 The composition of the tissue simulating liquid

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	Ethanediol STOT RE 2, H373; Acute Tox. 4, H302	< 5.2%
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%

3.2 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using Dielectric Probe Kit and Vector Network Analyzer.

Date	Tissue Type	Frequency (MHz)	Relative Permittivity (εr)			Conductivity (σ)			Tissue Temp. (°C)
			Measured	Target	Delta (%)	Measured	Target	Delta (%)	
2024/6/25	Head	1640	40.23	40.20	0.07	1.29	1.31	-1.53	22.2
2024/6/25	Head	1626.5	40.32	40.22	0.25	1.28	1.30	-1.54	22.2
2024/6/25	Head	1660.5	40.09	40.18	-0.22	1.31	1.32	-0.76	22.2

3.3 Tissue Dielectric Parameters for Phantoms

The head tissue dielectric parameters recommended by the IEC/IEEE 62209-1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head tissue parameters that have not been specified are interpolated according to the head parameters specified in IEC/IEEE 62209-1528.

Target Frequency (MHz)	Head	
	ϵ_r	σ (S/m)
450	43.5	0.87
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
1750	40.1	1.37
1800 – 2000	40.0	1.40
2450	39.2	1.80
3000	38.5	2.40
5000	36.2	4.45
5200	36.0	4.66
5400	35.8	4.86
5600	35.5	5.07
5800	35.3	5.27
6000	35.1	5.48
6500	34.5	6.07
7000	33.9	6.65
7500	33.3	7.24

4. Measurement Procedure

4.1 SAR System Check

4.1.1 Dipoles



The SAR dipoles are optimized symmetrical dipole with $\lambda/4$ balun matched to a flat phantom section filled with tissue simulating liquids. 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. They are available for the variety of frequencies between 300MHz and 10 GHz. The provided tripod is used to hold the dipole below the phantom. As the distance between the dipole center and the TSL is critical, a spacer is placed between the dipole and the phantom. The spacing distance is frequency dependent.

4.1.2 SAR System Check Result

1. Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %.
2. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Delta 1g (%)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Delta 10g (%)	Tissue Temp. (°C)
2024/6/25	1640	250	8.17	33.80	32.68	-3.31	4.50	18.20	18	-1.10	22.2

4.2 SAR Measurement Procedure

The Dasy calculates SAR using the following equation,

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

Where :

σ : represents the simulated tissue conductivity

ρ : represents the tissue density

E :RMS electric field strength (V/m)

The SAR / APD measurements for the EUT should be performed on the channel that produces the highest rated output power of each transmitting antenna.

Pre-scans are made on the device to establish the location for the transmitting antenna, using a large area scan in either air or tissue simulation fluid.

The EUT is placed against the Universal Phantom where the maximum area scan dimensions are larger than the physical size of the resonating antenna. When the scan size is not large enough to cover the peak SAR / APD distribution, it is modified by either extending the area scan size in both the X and Y directions, or the device is shifted within the predefined area.

The area scan is then run to establish the peak SAR / APD location (interpolated resolution set at 1mm²)which is then used to orient the center of the zoom scan. The zoom scan is then executed and the 1g and 10g averages are derived from the zoom scan volume (interpolated resolution set at 1mm³).

5. RF Exposure Limits

SAR assessments have been made in line with the requirements of IEEE-1528, RSS-102 Issue 6, and comply with ANSI/IEEE C95.1-1992 "Uncontrolled Environments" limits. These limits apply to a location which is deemed as "Uncontrolled Environment" which can be described as a situation where the general public may be exposed to an RF source with no prior knowledge or control over their exposure.

Limits for General Population/Uncontrolled Exposure (W/kg)

Type Exposure	Uncontrolled Environment Limit
Spatial Peak SAR (1g cube tissue for brain or body)	1.60 W/kg
Spatial Average SAR (whole body)	0.08 W/kg
Spatial Peak SAR (10g for hands, feet, ankles and wrist)	4.00 W/kg
Power density ¹	1 mW/cm²

Note: 1 mW/cm² = 10 W/m²

6. Test Equipment List

Instrument	Manufacturer	Model No.	Serial No.	Last Calibration	Next Calibration
Reference Dipole 1640MHz	Speag	D1640V2	329	2023/04/19	2026/04/18
Device Holder	Speag	N/A	N/A	N/A	N/A
Data Acquisition Electronic	Speag	DAE4	1651	2024/02/15	2025/02/14
E-Field Probe	Speag	EX3DV4	7631	2024/02/21	2025/02/20
SAR Software	Speag	DASY52	V52.10.4.1535	N/A	N/A
Power Amplifier	Mini-Circuit	ZHL-42	D051404-20	N/A	N/A
Directional Coupler	Agilent	87300C	MY44300353	N/A	N/A ¹
Attenuator	Woken	WATT-218FS-10	N/A	N/A	N/A ¹
Attenuator	Mini-Circuit	BW-S20W2+	N/A	N/A	N/A ¹
Vector Network Analyzer	Keysight	E5071C	MY46106342	2023/10/27	2024/10/26
Signal Generator	Anritsu	MG3694A	041902	2023/09/07	2024/09/06
Power Meter	Anritsu	ML2487A	6K00001447	2023/11/06	2024/11/05
Power Sensor	Anritsu	MA2411B	1339194	2023/11/06	2024/11/05

Note: 1. System Check, the path loss measured by the network analyzer, includes the signal generator, amplifier, cable, attenuator and directional coupler.

Note:

Per KDB 865664 D01 requirements for dipole calibration, the following are recommended FCC procedures for SAR dipole calibration.

1. After a dipole is damaged and properly repaired to meet required specifications.
2. When the measured SAR deviates from the calibrated SAR value by more than 10% due to changes in physical, mechanical, electrical or other relevant dipole conditions.
3. When the most recent return-loss, measured at least annually, deviates by more than 20% from the previous measurement (i.e. 0.2 of the dB value) or not meeting the required -20 dB return-loss specification.

	Frequency	Tissue	Return loss	Limit	Date
Calibration	1640 MHz	Head	-26.39	Within 20%	2023/4/19
Measurement	1640 MHz	Head	-26.36		2024/4/18

4. When the most recent measurement of the real or imaginary parts of the impedance, measured at least annually, deviates by more than 5Ω from the previous measurement.

	Frequency	Tissue	Return loss	Limit	Date
Calibration	1640 MHz	Head	53.13	Within 5Ω	2023/4/19
Measurement	1640 MHz	Head	53.45		2024/4/18

7. Measurement Uncertainty

Measurement uncertainty for 300 MHz to 3 GHz							
Error Description	Uncert. value	Prob. Dist.	Div.	(c _i) 1g	(c _i) 10g	Std. Unc. (1g)	Std. Unc. (10g)
Measurement System Errors							
Probe Calibration	±12.0%	N	2	1	1	±6.0%	±6.0%
Probe Calibration Drift	±1.7%	R	1.732	1	1	±1.0%	±1.0%
Probe Linearity	±4.7%	R	1.732	1	1	±2.7%	±2.7%
Broadband Signal	±2.8%	R	1.732	1	1	±1.6%	±1.6%
Probe Isotropy	±7.6%	R	1.732	1	1	±4.4%	±4.4%
Other Probe+Electronic	±0.8%	N	1	1	1	±0.8%	±0.8%
RF Ambient	±1.8%	N	1	1	1	±1.8%	±1.8%
Probe Positioning	±0.006 mm	N	1	0.14	0.14	±0.1%	±0.1%
Data Processing	±1.2%	N	1	1	1	±1.2%	±1.2%
Phantom and Device Errors							
Conductivity (meas.)	±2.5%	N	1	0.78	0.71	±2.0%	±1.8%
Conductivity (temp.)	±3.3%	R	1.732	0.78	0.71	±1.5%	±1.4%
Phantom Permittivity	±14.0%	R	1.732	0	0	±0.0%	±0.0%
Distance DUT - TSL	±2.0%	N	1	2	2	±4.0%	±4.0%
Device Positioning	±1.0%	N	1	1	1	±1.0%	±1.0%
Device Holder	±3.6%	N	1	1	1	±3.6%	±3.6%
DUT Modulation	±2.4%	R	1.732	1	1	±1.4%	±1.4%
Time-average SAR	±1.7%	R	1.732	1	1	±1.0%	±1.0%
DUT drift	±2.5%	N	1	1	1	±2.5%	±2.5%
Val Antenna Unc.	±0.0%	N	1	1	1	±0.0%	±0.0%
Unc. Input Power	±0.0%	N	1	1	1	±0.0%	±0.0%
Correction to the SAR results							
Deviation to Target	±1.9%	N	1	1	0.84	±1.9%	±1.6%
SAR scaling	±0.0%	R	1.732	1	1	±0.0%	±0.0%
Combined Uncertainty						±11.0%	±10.9%
Expanded Uncertainty						±21.9%	±21.7%

8. Conducted Power Measurement (Including tolerance allowed for production unit)

Frequency	Mode	SISO		
		CH	Avg. Power	Tune-Up Power
1.64GHz	GMSK	F1	31.64	33
		F4	28.53	30.5

9. Test Results

9.1 Test Results Summary

SAR MEASUREMENT								
Ambient Temperature (°C): 22.9±2			Relative Humidity (%):58 %					
Liquid Temperature (°C): 22.2 ±2			Depth of Liquid (cm): >15					
Test Position	Dist. (mm)	Frequency		Conducted Power (dBm)		SAR (W/kg)		Plot No.
		Ch.	MHz	Meas.	Tune-Up Limit	Meas-1g	Scaled-1g	
Test Mode: 1.64GHz_GMSK_BP-272								
Position 1	25	F1	1626.5	31.64	33	0.792	1.083	1
Position 2	25	F1	1626.5	31.64	33	0.701	0.959	
Position 3	25	F1	1626.5	31.64	33	0.630	0.862	
Position 4	25	F1	1626.5	31.64	33	0.670	0.916	
Position 1	25	F4	1660.5	28.53	30.5	0.356	0.560	
Test Mode: 1.64GHz_GMSK_BP-307								
Position 1	25	F1	1626.5	31.64	33	0.768	1.050	

Note:

1. Based on KDB 447498, the distance has been determined by the product manufacturer to be 25 mm, according to the minimum spacing required by the user.

Appendix

Appendix A. System Check Data

Appendix B. Highest measurement Data

Appendix C. Test Setup Photographs

Appendix D. Probe Calibration Data

Appendix E. Dipole Calibration Data

Appendix F. Product Photos-Please refer to the file: 23C0129R-Product Photos