

# TEST REPORT

Report No.: BCTC2504123563EN1

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Applicant: Shenzhen Zhong Xun Chuangzhi Technology Co.,Ltd

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Product Name: GPS Tracker

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Test Model: G51

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Tested Date: 2025-05-20 to 2025-06-05

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Issued Date: 2025-07-11

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**Shenzhen BCTC Testing Co., Ltd.**



## FCC ID: 2BO3V-G51

Product Name: GPS Tracker

Trademark: N/A

G51  
G50, G50L, G50S, G50M, G51L, G51S, G51M, G52, G53, G55, G56, G57, G58, G58L, G58S, G58M, G59, G60, G61, G61L, G61S, G61M, G62, G63, G65, G66, G67, G68, G68P, G68L, G68S, G68M, G69, GF01, GF02, GF03, GF05, GF06, GF07, GF08, GF09, GF10, GF11, GF12, GT01, GT02, GT03, GT05, GT06, ZX903, ZX905, ZX906, ZX907, ZX908, ZX909, ZX910, ZX911, ZX912, ZX913, ZX915, ZX916, ZX917, ZX918, ZX919

Model/Type Reference:

Prepared For: Shenzhen Zhong Xun Chuangzhi Technology Co.,Ltd

Address: 502D, Block B, Donglian Building, Chuangye 2nd Road, Area 23, Xinan Subdistrict, Baoan District, Shenzhen, Guangdong, China

Manufacturer: Shenzhen Zhong Xun Chuangzhi Technology Co.,Ltd

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Prepared By: Shenzhen BCTC Testing Co., Ltd.

Address: 1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China

Sample Received Date: 2025-04-09

Sample tested Date: 2025-05-20 to 2025-06-05

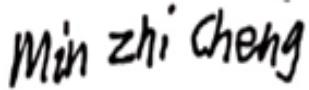
Issue Date: 2025-07-11

Test Standards: IEEE Std C95.1-2019  
IEEE Std 1528-2013  
FCC Part 2.1093

Test Results: PASS

Remark: This is SAR test report

Tested by:



Min Zhi Cheng / Project Handler

Approved by:



Zero Zhou / Reviewer

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(Note: N/A Means Not Applicable)

## 1. Version

Report No.	Issue Date	Description	Approved
BCTC2504123563E	2025-06-05	Original	Invalid
BCTC2504123563EN1	2025-07-11	Revision	Valid

## 2. Test Standards

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

IEEE Std 1528-2013: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.

FCC Part 2.1093 Radiofrequency Radiation Exposure Evaluation: Portable Devices

KDB 447498 D01 General RF Exposure Guidance v06: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04: SAR Measurement Requirements for 100 MHz to 6 GHz

KDB 865664 D02 RF Exposure Reporting v01r02: RF Exposure Compliance Reporting and Documentation Considerations

KDB 248227 D01 802.11 Wi-Fi SAR v02r02: SAR GUIDANCE FOR IEEE 802.11 (Wi-Fi) TRANSMITTERS

KDB 941225 D01 3G SAR Procedures: 3G SAR MEAUREMENT PROCEDURES

KDB 941225 D05 SAR for LTE Devices: SAR EVALUATION CONSIDERATIONS FOR LTE DEVICES

KDB 941225 D06 Hotspot Mode v02r01: SAR EVALUATION PROCEDURES FOR PORTABLE DEVICES WITH WIRELESS ROUTER CAPABILITIES

KDB 648474 D04 Handset SAR v01r03: SAR EVALUATION CONSIDERATIONS FOR WIRELESS HANDSETS

KDB 648474 D04 Handset SAR v01r03: SAR EVALUATION CONSIDERATIONS FOR WIRELESS HANDSETS

### 3. Test Summary

The maximum results of Specific Absorption Rate (SAR) have found during testing are as follows:

Frequency Band	Maximum SAR <sub>1g</sub> (W/kg)	Limit SAR <sub>1g</sub> (W/kg)
	Body (0mm Gap)	
<b>GSM 850</b>	1.061	1.6
<b>GSM 1900</b>	1.378	
<b>LTE Band 2</b>	1.218	
<b>LTE Band 4</b>	1.163	
<b>LTE Band 5</b>	1.431	

The device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2019, and had been tested in accordance with the measurement methods and procedure specified in IEEE 1528-2013.

#### 4. SAR Limits

FCC Limit (1g Tissue)

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

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

## 5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is <3.75 W/kg. The expanded SAR measurement uncertainty must be  $\leq 30\%$ , for a confidence interval of  $k=2$ . If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.

## 6. Product Information and Test Setup

### 6.1 Product Information

Model/Type reference:	G51 G50, G50L, G50S, G50M, G51L, G51S, G51M, G52, G53, G55, G56, G57, G58, G58L, G58S, G58M, G59, G60, G61, G61L, G61S, G61M, G62, G63, G65, G66, G67, G68, G68P, G68L, G68S, G68M, G69, GF01, GF02, GF03, GF05, GF06, GF07, GF08, GF09, GF10, GF11, GF12, GT01, GT02, GT03, GT05, GT06, ZX903, ZX905, ZX906, ZX907, ZX908, ZX909, ZX910, ZX911, ZX912, ZX913, ZX915, ZX916, ZX917, ZX918, ZX919
Model differences:	All models have the same circuit and RF module, but the model names and colors are different.
Hardware Version:	N/A
Software Version:	N/A
Ratings:	DC 5V from adapter/ DC 3.7V from battery
<b>2G</b>	
Operation Frequency:	GPRS/EGPRS 850: TX: 824~849MHz; RX: 869~894MHz; GPRS/EGPRS 1900: TX:1850~1910MHz; RX:1930~1990MHz;
GPRS Class:	Class 12
Max RF Output Power:	GPRS/EGPRS 850: 31.03 dBm, GPRS/EGPRS 1900: 27.91 dBm
Type of Modulation:	GSM Mode with GMSK,8PSK Modulation
Type of Emission:	GPRS 850: 248KGXW EGPRS 850:250KG7W GPRS 1900: 257KGXW EGPRS 1900:258KG7W
Antenna installation:	Internal antenna GSM850: 0.5 dBi GSM1900: 0.5 dBi
Antenna Gain:	Remark: <input type="checkbox"/> The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information. <input checked="" type="checkbox"/> The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

Tx Frequency:	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz
Rx Frequency:	LTE Band 2: 1930 MHz ~ 1990 MHz LTE Band 4: 2110 MHz ~ 2155 MHz LTE Band 5: 869 MHz ~ 894 MHz
Bandwidth:	LTE Band 2: 1.4MHz /3MHz /5MHz /10MHz /15MHz /20MHz LTE Band 4: 1.4MHz /3MHz /5MHz /10MHz /15MHz /20MHz LTE Band 5: 1.4MHz /3MHz /5MHz /10MHz
The Max RF Output Power (EIRP/ERP)	LTE Band 2: 23.21 dBm LTE Band 4: 22.83 dBm LTE Band 5: 20.96 dBm
99% Occupied Bandwidth:	LTE Band 2: 18M1G7D LTE Band 4: 18M0G7D LTE Band 5: 9M03G7D
Type of Modulation:	QPSK/16QAM
Antenna Type:	Internal Antenna LTE Band 2: 0.5 dBi LTE Band 4: 0.5 dBi LTE Band 5: 0.5 dBi
Antenna Gain:	Remark: <input type="checkbox"/> The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information. <input checked="" type="checkbox"/> The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

## 6.2 Test Setup Configuration

See test photographs attached in EUT TEST SETUP PHOTOGRAPHS for the actual connections between Product and support equipment.

## 6.3 Support Equipment

Cable of Product

No.	Cable Type	Quantity	Provider	Length (m)	Shielded	Note
1	--	--	Applicant	---	Yes/No	--
2	--	--	BCTC	--	Yes/No	--

No.	Device Type	Brand	Model	Series No.	Note
1.	---	---	---	---	---
2.	--	--	--	--	--

Notes:

1. All the equipment/cables were placed in the worst-case configuration to maximize the emission during the test.
2. Grounding was established in accordance with the manufacturer's requirements and conditions for the intended use.

## 6.4 Test Environment

### 1. Normal Test Conditions:

Humidity(%):	35-75
Atmospheric Pressure(kPa):	95-105
Temperature(°C):	18-25

### 2. Extreme Test Conditions:

N/A

## 7. Test Facility and Test Instrument Used

### 7.1 Test Facility

All measurement facilities used to collect the measurement data are located at Shenzhen BCTC Testing Co., Ltd. Address: 1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China. The site and apparatus are constructed in conformance with the requirements of ANSI C63.4 and CISPR 16-1-1 other equivalent standards.

FCC Test Firm Registration Number: 712850  
A2LA certificate registration number is: CN1212  
ISED Registered No.: 23583  
ISED CAB identifier: CN0017

## 7.2 Test Instrument Used

Equipment	Manufacturer	Model#	Serial#	Last Cal.	Next Cal.
PC	DELL	\	\	N/A	N/A
SAR Measurement system	SATIMO	\	\	N/A	N/A
Signal Generator	Keysight	83711B	US37100131	May 14, 2025	May 13, 2026
Multimeter	Keithley	1160271	\	Nov. 10, 2024	Nov 09, 2025
S-parameter Network Analyzer	R&S	ZVB 8	101353	Dec. 07, 2024	Dec. 06, 2025
Wideband Radio Communication Tester	R&S	CMW500	\	Nov. 10, 2024	Nov 09, 2025
E SAR PROBE 6GHz	MVG	SSE2	2623-EPGO-420	July 18, 2024	July 17, 2025
DIPOLE 835	SATIMO	SID 835	SN 47/21 DIP 0G835-621	Nov. 25, 2024	Nov. 24, 2027
DIPOLE 1800	SATIMO	SID 1800	SN 47/21 DIP 1G800-623	Nov. 25, 2024	Nov. 24, 2027
DIPOLE 1900	SATIMO	SID 1900	SN 47/21 DIP 1G900-624	Nov. 25, 2024	Nov. 24, 2027
COMOSAR OPEN Coaxial Probe	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
SAR Locator	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
Communication Antenna	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
FEATURE PHONEPOSITIONING DEVICE	SATIMO	\	\	N/A	N/A
DUMMY PROBE	SATIMO	\	\	N/A	N/A
SAM Phantom	MVG	\	SN 13/09 SAM68	N/A	N/A
Liquid measurement Kit	HP	85033D	3423A08186	N/A	N/A
Power meter	Keysight	E4419	A00065	May 14, 2025	May 13, 2026
Power sensor	Keysight	E9300A	US39211659	May 14, 2025	May 13, 2026
Power sensor	Keysight	E9300A	US39211305	May 14, 2025	May 13, 2026
Directional Coupler	Krytar 158020	131467	\	Nov. 10, 2024	Nov 09, 2025
Thermometer	BTE	\	\	Dec. 02, 2024	Dec. 01, 2025
Broad Band Tissue Simulation Liquid	Schmid	\	\	N/A	N/A

Note:

Per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three year extended calibration interval. Each measured dipole is expected to evaluate with following criteria at least on annual interval.

1. There is no physical damage on the dipole;
2. System check with specific dipole is within 10% of calibrated values;
3. The most recent return-loss results, measured at least annually, deviates by no more than 20% from the previous measurement;
4. The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within  $5\Omega$  from the previous measurement.

## 8. Specific Absorption Rate (SAR)

### 8.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

### 8.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy ( $dW$ ) absorbed by (dissipated in) an incremental mass ( $dm$ ) contained in a volume element ( $dv$ ) of a given density ( $\rho$ ). The equation description is as below:

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

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

SAR measurement can be either related to the temperature elevation in tissue by

$$\mathbf{SAR} = C \left( \frac{\delta T}{\delta t} \right)$$

Where:  $C$  is the specific heat capacity,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the

electrical field in the tissue by

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  is the mass density of the tissue and  $E$  is the RMS electrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

## 9. SAR Measurement System

### 9.1 The Measurement System

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

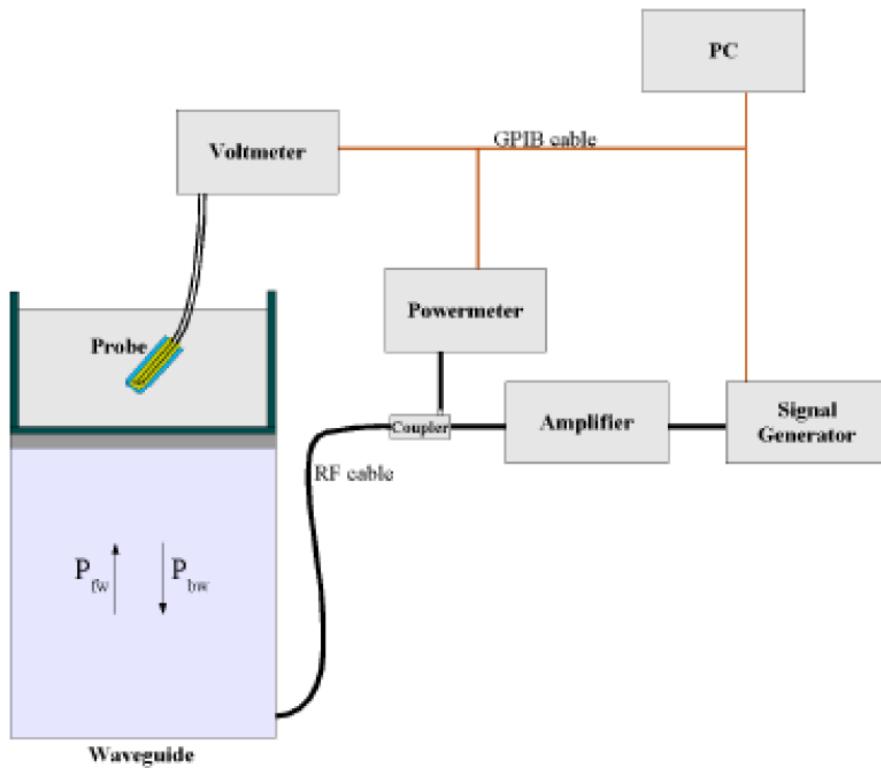
### 9.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SN 46/21 EPGO362 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter: 5 mm
- Distance between probe tip and sensor center: 2.10mm
- Distance between sensor center and the inner phantom surface: 4 mm (repeatability better than +/- 1mm)
- Probe linearity: <0.25 dB
- Axial Isotropy: <0.25 dB
- Spherical Isotropy: <0.50 dB
- Calibration range: 835 to 2500MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and surface normal line: less than 30°

Probe calibration is realized, in compliance with EN 62209-1 and IEEE 1528 STD, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 62209-1 annex technique using reference guide at the five frequencies.



$$SAR = \frac{4(p_{fw} - p_{bw})}{ab\delta} \cos^2 \left( \pi \frac{y}{a} \right) e^{(2\pi/\delta)}$$

Where :

$P_{fw}$  = Forward Power

$P_{bw}$  = Backward Power

$a$  and  $b$  = Waveguide dimensions

$\delta$  = Skin depth

Keithley configuration:

Rate = Medium; Filter = ON; RDGS = 10; Filter type = Moving Average; Range auto after each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors,  $CF(N)$ , for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N) = SAR(N) / V_{lin}(N) \quad (N=1,2,3)$$

The linearised output voltage  $V_{lin}(N)$  is obtained from the displayed output voltage  $V(N)$  using

$$V_{lin}(N) = V(N) * (1 + V(N) / DCP(N)) \quad (N=1,2,3)$$

where  $DCP$  is the diode compression point in mV.

### 9.3 Probe Calibration Process

#### Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm<sup>2</sup>) using an with CALISAR, Antenna proprietary calibration system.

#### Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1mW/cm<sup>2</sup>.

#### Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

Where:

$$\text{SAR} = C \frac{\Delta T}{\Delta t}$$

$\Delta t$  = exposure time (30 seconds),

$C$  = heat capacity of tissue (brain or muscle),

$\Delta T$  = temperature increase due to RF exposure.

SAR is proportional to  $\Delta T/\Delta t$ , the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

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

Where:

$\sigma$  = simulated tissue conductivity,

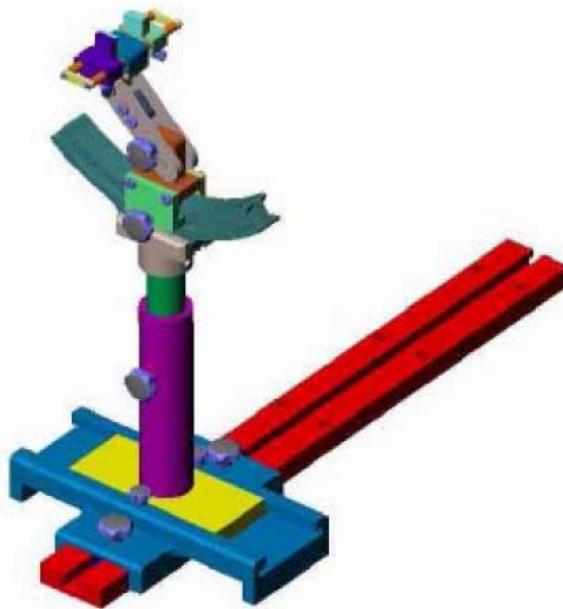
$\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

## 9.4 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

## 9.5 Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1°.



System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

## 10. Tissue Simulating Liquids

### 10.1 Composition of Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with SMTIMO, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. Please see the following photos for the liquid height.



Liquid Height for Body SAR

The Composition of Tissue Simulating Liquid

Frequency (MHz)	Water (%)	Salt (%)	1,2-Propane diol (%)	HEC (%)	Preventol (%)	DGBE (%)
<b>Head/Body</b>						
835	40.3	1.4	57.9	0.2	0.2	0
900	40.3	1.4	57.9	0.2	0.2	0
1800-2000	55.2	0.3	0	0	0	44.5
2450	55.0	0.1	0	0	0	44.9
2600	54.9	0.1	0	0	0	45.0

Frequency (MHz)	Water (%)	Hexyl Carbitol (%)	Triton X-100 (%)
<b>Head/Body</b>			
5000-6000	65.52	17.24	17.24

## 10.2 Limit

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 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 and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters

computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Target Frequency (MHz)	Head	
	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
150	0.76	52.3
300	0.87	45.3
450	0.87	43.5
750	0.89	41.9
835	0.90	41.5
900	0.97	41.5
915	0.98	41.5
1450	1.20	40.5
1610	1.29	40.3
1800-2000	1.40	40.0
2450	1.80	39.2
2600	1.96	39.0
3000	2.40	38.5
5200	4.66	36.0
5400	4.86	35.8
5600	5.07	35.5
5800	5.27	35.3

### 10.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an R&S ZVB 8. Dielectric Probe Kit and an Agilent Network Analyzer.

#### Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

Frequency (MHz)	Liquid	Target ( $\sigma$ )	Target ( $\epsilon_r$ )	Measured ( $\sigma$ )	Measured ( $\epsilon_r$ )	Delta ( $\sigma$ )%	Delta ( $\epsilon_r$ )%	Limit (%)	Air (°C)	Date
835	Head	0.90	41.50	0.908	42.516	0.89	2.45	$\pm 5$	22.9	23/5/2025
1800	Head	1.40	40.00	1.451	40.982	3.64	2.46	$\pm 5$	22.9	23/5/2025
1900	Head	1.40	40.00	1.454	38.125	3.86	-4.69	$\pm 5$	22.9	23/5/2025

#### Remark:

1. The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within  $\pm 2^\circ\text{C}$  of the temperature when the tissue parameters are characterized.
2. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

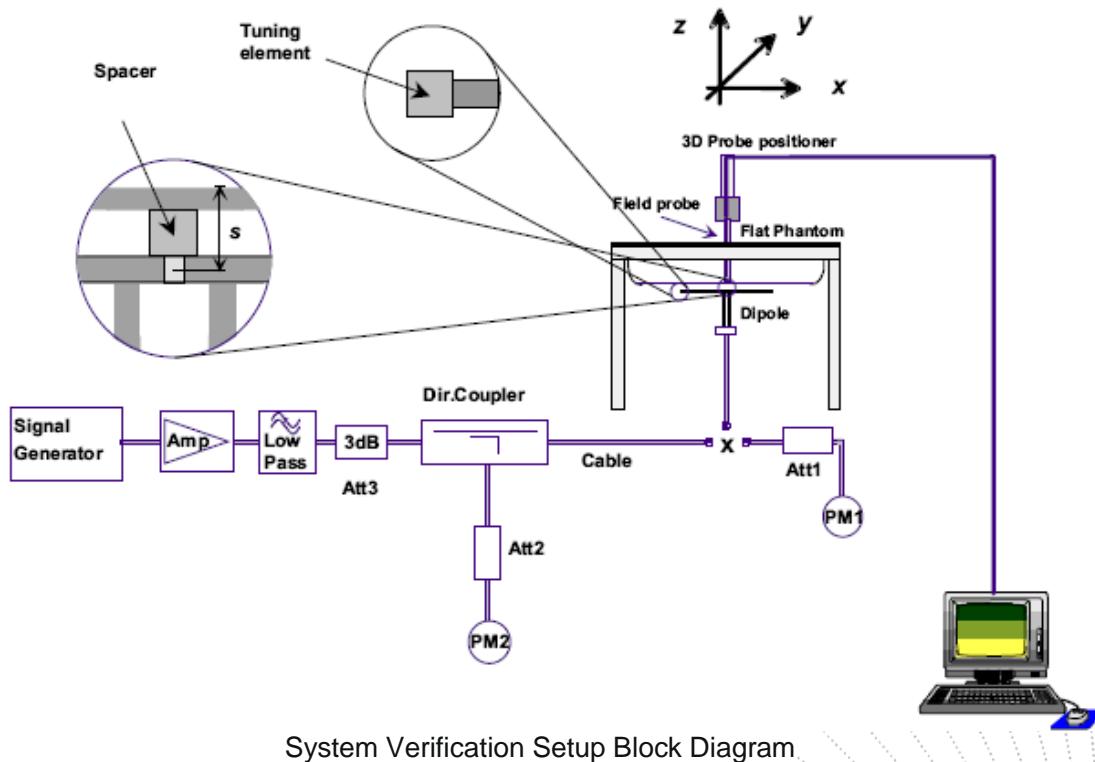
## 11. System Check

### 11.1 Purpose of System Performance Check

At the device test frequencies. System check verifies the measurement repeatability of a SAR system before compliance testing and is not a validation of all system specifications. The latter is not required for testing a device but is mandatory before the system is deployed. The system check detects possible short-term drift and unacceptable measurement errors or uncertainties in the system.

### 11.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 600MHz-6000MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The output power on dipole port must be calibrated to 20 dBm (100 mW) before dipole is connected.





Setup Photo of Dipole Antenna

### 11.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. The following 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.

Frequency (MHz)	Power	Measured SAR <sub>1g</sub> (W/Kg)	Normalize to 1 Watt	Drift (%)	1W Target	Difference Percentage (%)	Limit (%)	Liquid (°C)	Date
					SAR <sub>1g</sub> (W/Kg)				
835	250mW	2.482	9.927	3.297	10.01	-0.829	±10	23.1	23/5/2025
1800	250mW	10.019	40.075	4.010	39.74	0.843	±10	23.1	23/5/2025
1900	250mW	10.636	42.544	0.491	41.26	3.112	±10	23.1	23/5/2025

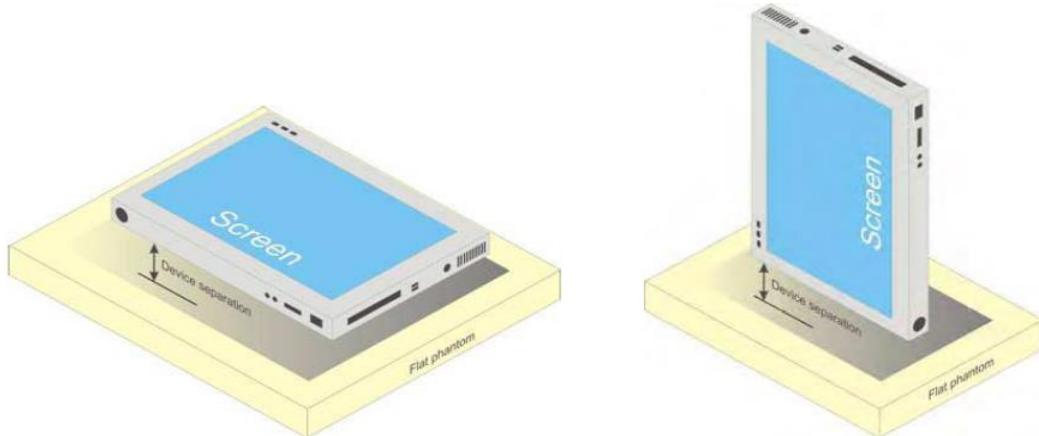
## 12. EUT Testing Position

### Body Position

A typical example of a body supported device is a wireless enabled laptop device that among other orientations may be supported on the thighs of a sitting user. To represent this orientation, the device shall be positioned with its base against the flat phantom. Other orientations may be specified by the manufacturer in the user instructions. If the intended use is not specified, the device shall be tested directly against the flat phantom in all usable orientations.

The example shows a tablet form factor portable computer for which SAR should be separately assessed with

- a). each surface and
- b). the separation distances



Tablet form factor portable computer

## 13. SAR Measurement Procedures

### 13.1 Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the highest power channel.
- (b) Keep EUT to radiate maximum output power or 100% factor (if applicable)
- (c) Measure output power through RF cable and power meter.
- (d) Place the EUT in the positions as Annex D demonstrates.
- (e) Set scan area, grid size and other setting on the SATIMO software.
- (f) Measure SAR results for the highest power channel on each testing position.
- (g) Find out the largest SAR result on these testing positions of each band
- (h) Measure SAR results for other channels in worst SAR testing position if the SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

### 13.2 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The SATIMO software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine. The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

### 13.3 Area & Zoom Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures 5x5x7 points with step size 8, 8 and 5 mm for 300 MHz to 3 GHz, and 8x8x8 points with step size 4, 4 and 2.5 mm for 3 GHz to 6 GHz. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g.

		$\leq 3$ GHz	$> 3$ GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		$5 \text{ mm} \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \delta \cdot \ln(2) \text{ mm} \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location		$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
		$\leq 2 \text{ GHz: } \leq 15 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 12 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 12 \text{ mm}$ $4 - 6 \text{ GHz: } \leq 10 \text{ mm}$
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$		When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$		$\leq 2 \text{ GHz: } \leq 8 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz: } \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$	$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 4 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 3 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$
	graded grid	$\Delta z_{\text{Zoom}}(1): \text{ between } 1^{\text{st}} \text{ two points closest to phantom surface}$ $\Delta z_{\text{Zoom}}(n>1): \text{ between subsequent points}$	$\leq 4 \text{ mm}$ $\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1) \text{ mm}$
Minimum zoom scan volume	x, y, z	$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz: } \geq 28 \text{ mm}$ $4 - 5 \text{ GHz: } \geq 25 \text{ mm}$ $5 - 6 \text{ GHz: } \geq 22 \text{ mm}$
Note: $\delta$ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.			
* When zoom scan is required and the <u>reported</u> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB Publication 447498 is $\leq 1.4 \text{ W/kg}$ , $\leq 8 \text{ mm}$ , $\leq 7 \text{ mm}$ and $\leq 5 \text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.			

### 13.4 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing (step-size is 4, 4 and 2.5 mm). When all volume scan were completed, the software can combine and subsequently superpose these measurement data to calculating the multiband SAR.

### 13.5 SAR Averaged Methods

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10g and 1 g requires a very fine resolution in the three dimensional scanned data array.

### 13.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In SATIMO measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drift more than 5%, the SAR will be retested.

## 14. SAR Test Result

### 14.1 Conducted RF Output Power

GSM - Burst Average Power (dBm)								
Band	GSM850			Tune-up	GSM1900			Tune-up
Channel	128	190	251		512	661	810	
Frequency (MHz)	824.2	836.6	848.8		1850.2	1880	1909.8	
GPRS slots-1	30.63	31.03	30.98	31.5	27.91	26.27	25.08	28.0
GPRS slots-2	30.62	31.00	30.97	31.5	27.85	26.23	25.08	28.0
GPRS slots-3	28.80	29.26	29.24	29.5	26.14	24.71	23.48	26.5
GPRS slots-4	26.85	27.30	27.24	27.5	24.11	22.53	21.52	24.5
EGPRS slots-1	25.10	25.55	25.22	26.0	24.88	23.72	22.82	25.0
EGPRS slots-2	23.34	24.09	23.94	24.5	23.56	22.17	20.84	24.0
EGPRS slots-3	21.28	21.80	21.87	22.0	21.27	19.54	18.57	21.5
EGPRS slots-4	19.46	20.17	19.84	20.5	19.60	17.39	16.39	20.0

GSM - Source-Based Time-Average Power (dBm)						
Band	GSM850			GSM1900		
Channel	128	190	251	512	661	810
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880	1909.8
GPRS slots-1	24.13	24.11	24.18	20.96	21.02	20.99
GPRS slots-2	21.63	22.03	21.98	18.91	17.27	16.08
GPRS slots-3	24.62	25.00	24.97	21.85	20.23	19.08
GPRS slots-4	24.55	25.01	24.99	21.89	20.46	19.23
EGPRS slots-1	23.85	24.30	24.24	21.11	19.53	18.52
EGPRS slots-2	16.10	16.55	16.22	15.88	14.72	13.82
EGPRS slots-3	17.34	18.09	17.94	17.56	16.17	14.84
EGPRS slots-4	17.03	17.55	17.62	17.02	15.29	14.32

#### Notes:

##### 1. Division Factors

To average the power, the division factor is as follows:

1TX-slots = 1 transmit time slots out of 8 time slots=> conducted power divided by (8/1) => -9.00dB

2TX-slots = 2 transmit time slots out of 8 time slots=> conducted power divided by (8/2) => -6.00dB

3TX-slots = 3 transmit time slots out of 8 time slots=> conducted power divided by (8/3) => -4.26dB

4TX-slots = 4 transmit time slots out of 8 time slots=> conducted power divided by (8/4) => -3.00dB

Please refer to Appendix 1. Transmitter maximum output power

## 14.2 Transmit Antennas and SAR Measurement Position

**EUT Antenna Location:**



Antennas		Support Band	
WWAN		GSM 850/1900 + LTE Band 2/4/5	

Distance of The Antenna to the EUT surface and edge (mm)						
Antennas	Front	Back	Top Side	Bottom Side	Left Side	Right Side
WWAN	<25	<25	35	<25	<25	<25

Body mode: Positions for SAR tests						
Antennas	Front	Back	Top Side	Bottom Side	Left Side	Right Side
WWAN	Yes	Yes	No	Yes	Yes	Yes

### 14.3 Measured and Reported (Scaled) SAR Results

The calculated SAR is obtained by the following formula:

1. Reported SAR for WWAN=Measured SAR \* Tune-up Scaling factor
2. Reported SAR for WLAN and Bluetooth=Measured SAR \* Tune-up Scaling factor \* Duty Cycle Scaling factor
3. Duty Cycle Scaling factor=1/ Duty Cycle (%)

GSM 850							
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Output Power (dBm)		SAR <sub>1g</sub> (W/kg)	Plot No.
				Meas.	Turn- up	Meas.	
Body (0mm)	GPRS slots-4	Front Face	836.6	27.30	27.5	0.459	0.481
		Back Face	836.6	27.30	27.5	0.284	0.297
		Left Side	836.6	27.30	27.5	0.477	0.499
		Right Side	836.6	27.30	27.5	0.806	0.844
		Bottom Side	836.6	27.30	27.5	0.312	0.327
		Right Side	824.2	26.85	27.5	0.892	1.036
		Right Side	846.6	27.24	27.5	0.999	1.061

GSM 1900							
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Output Power (dBm)		SAR <sub>1g</sub> (W/kg)	Plot No.
				Meas.	Turn- up	Meas.	
Body (0mm)	GPRS slots-4	Front Face	1850.2	24.11	24.5	0.839	0.918
		Back Face	1850.2	24.11	24.5	1.260	1.378
		Left Side	1850.2	24.11	24.5	0.622	0.680
		Right Side	1850.2	24.11	24.5	0.669	0.732
		Bottom Side	1850.2	24.11	24.5	0.214	0.234
		Back Face	1880	22.53	24.5	0.827	1.302
		Back Face	1909.8	21.52	24.5	0.683	1.357

LTE Band 2 (20MHz Bandwidth)							
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Output Power (dBm)		SAR <sub>1g</sub> (W/kg)	Plot No.
				Meas.	Turn- up	Meas.	
Body (0mm)	QPSK, 1RB	Front Face	1860	22.71	23.0	0.233	0.249
		Back Face	1860	22.71	23.0	1.139	1.218
		Left Side	1860	22.71	23.0	0.438	0.468
		Right Side	1860	22.71	23.0	1.000	1.069
		Bottom Side	1860	22.71	23.0	0.173	0.185
		Back Face	1880	21.57	23.0	0.821	1.141
		Back Face	1900	21.47	23.0	0.853	1.213
	QPSK, 50%RB	Front Face	1880	20.40	20.5	0.189	0.193
		Back Face	1880	20.40	20.5	0.759	0.777
		Left Side	1880	20.40	20.5	0.202	0.207
		Right Side	1880	20.40	20.5	0.668	0.684
		Bottom Side	1880	20.40	20.5	0.110	0.113
	QPSK, 100%RB	Back Face	1880	20.95	21.0	0.603	0.610

LTE Band 4 (20MHz Bandwidth)								
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Output Power (dBm)		SAR <sub>1g</sub> (W/kg)		Plot No.
				Meas.	Turn- up	Meas.	Scaled	
Body (0mm)	QPSK, 1RB	Front Face	1720	22.23	22.5	0.193	0.205	
		Back Face	1720	22.23	22.5	0.724	0.770	
		Left Side	1720	22.23	22.5	0.149	0.159	
		Right Side	1720	22.23	22.5	0.999	1.063	
		Bottom Side	1720	22.23	22.5	0.123	0.131	
		Right Side	1732.5	22.08	22.5	1.056	<b>1.163</b>	<b>4</b>
		Right Side	1745	21.41	22.5	0.749	0.963	
	QPSK, 50%RB	Front Face	1732.5	21.13	21.5	0.088	0.096	
		Back Face	1732.5	21.13	21.5	0.428	0.466	
		Left Side	1732.5	21.13	21.5	0.076	0.083	
		Right Side	1732.5	21.13	21.5	0.659	0.718	
		Bottom Side	1732.5	21.13	21.5	0.110	0.120	
	QPSK, 100%RB	Right Side	1745	21.38	21.5	0.501	0.515	

LTE Band 5 (10MHz Bandwidth)								
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Output Power (dBm)		SAR <sub>1g</sub> (W/kg)		Plot No.
				Meas.	Turn- up	Meas.	Scaled	
Body (0mm)	QPSK, 1RB	Front Face	836.5	22.61	23.0	0.506	0.554	
		Back Face	836.5	22.57	23.0	0.576	0.636	
		Left Side	836.5	22.61	23.0	0.617	0.675	
		Right Side	836.5	22.61	23.0	1.151	1.259	
		Bottom Side	836.5	22.61	23.0	0.232	0.254	
		Right Side	829	21.89	23.0	1.108	<b>1.431</b>	<b>5</b>
		Right Side	844	22.57	23.0	1.014	1.120	
	QPSK, 50%RB	Front Face	836.5	21.52	22.0	0.300	0.335	
		Back Face	836.5	21.52	22.0	0.296	0.331	
		Left Side	836.5	21.52	22.0	0.338	0.377	
		Right Side	836.5	21.52	22.0	0.697	0.778	
		Bottom Side	836.5	21.52	22.0	0.186	0.208	
	QPSK, 100%RB	Right Side	836.5	21.27	21.5	0.641	0.676	

## 14.4 SAR Measurement Variability

According to KDB865664, Repeated measurements are required only when the measured SAR is  $\geq 0.80$  W/kg. If the measured SAR value of the initial repeated measurement is  $< 1.45$  W/kg with  $\leq 20\%$  variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required. The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.<sup>19</sup> The repeated measurement results must be clearly identified in the SAR report. All measured SAR, including the repeated results, must be considered to determine compliance and for reporting according to KDB 690783. Repeated measurement is not required when the original highest measured SAR is  $< 0.80$  W/kg; steps 2) through 4) do not apply.

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

Test Mode	Frequency (MHz)	RF Exposure Configuration	Test Position	Repeated SAR (yes/no)	Highest Measured SAR1-g (W/Kg)	First Repeated	
						Measured SAR1-g (W/Kg)	Largest to Smallest SAR Ratio
GSM 850	846.6	Body	Right Side	yes	0.999	0.944	1.058
GSM 1900	1850.2	Body	Back Face	yes	1.260	1.213	1.039
LTE Band 2	1860	Body	Back Face	yes	1.139	1.080	1.055
LTE Band 4	1732.5	Body	Right Side	yes	1.056	0.993	1.063
LTE Band 5	829	Body	Right Side	yes	1.108	1.043	1.062

## 14.5 Simultaneous Transmission Evaluation

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

Application Simultaneous Transmission information:

No.	Configurations	Body SAR
1	WWAN + WIFI	No
2	WWAN + Bluetooth	No
3	WIFI + Bluetooth	No

**Remark:**

1. The prototype only supports the WWAN function.
2. According to the KDB 447498 D01 v06, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:
  - (max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]-[ $\sqrt{f(\text{GHz})/x}$ ] W/kg for test separation distances  $\leq 50$  mm;  
where  $x = 7.5$  for 1-g SAR, and  $x = 18.75$  for 10-g SAR.
  - 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is  $> 50$  mm

Estimated stand alone SAR					
Mode	Max. Power (dBm)	Max. Power (mW)	Separation Distance (mm)	X	Estimated SAR1-g (W/kg)
/	/	/	5	3.0	/
/	/	/	5	3.0	/

**Note:**

1. Maximum average power including tune-up tolerance;
2. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion
3. Per FCC KD B447498 D01, simultaneous transmission SAR test exclusion may be applied when the sum of the 1-g SAR for all the transmitting antenna in a specific a physical test configuration is  $\leq 1.6$  W/Kg. When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

$$\text{Ratio} = \frac{(\text{SAR}_1 + \text{SAR}_2)^{1.5}}{(\text{peak location separation,mm})} < 0.04$$

4. Simultaneous transmission of maximum SAR sum calculation.

## 15. Test Plots

### 15.1 System Performance Check

#### System check at 835 MHz

Date of measurement: 23/5/2025

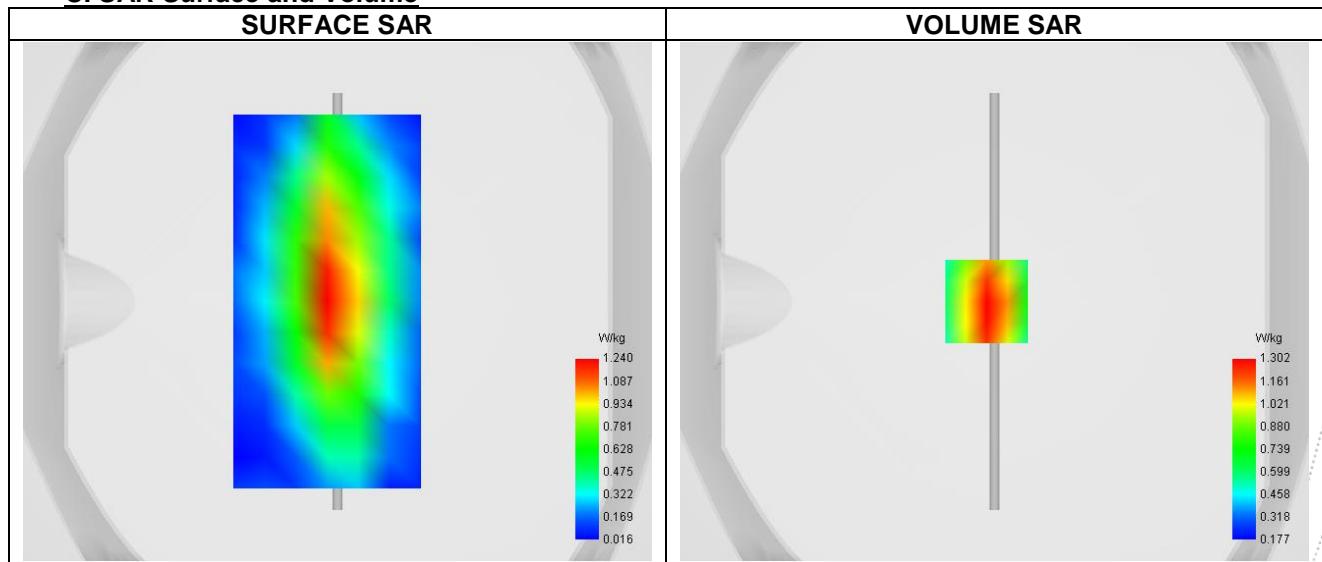
#### A. Experimental conditions.

Probe	SN 26/23 EPG0420
ConvF	0.80
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7, dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Dipole
Band	CW835
Signal	CW

#### B. Permittivity

Frequency (MHz)	835.000
Relative permittivity (real part)	42.516
Relative permittivity (imaginary part)	20.910
Conductivity (S/m)	0.908

#### C. SAR Surface and Volume

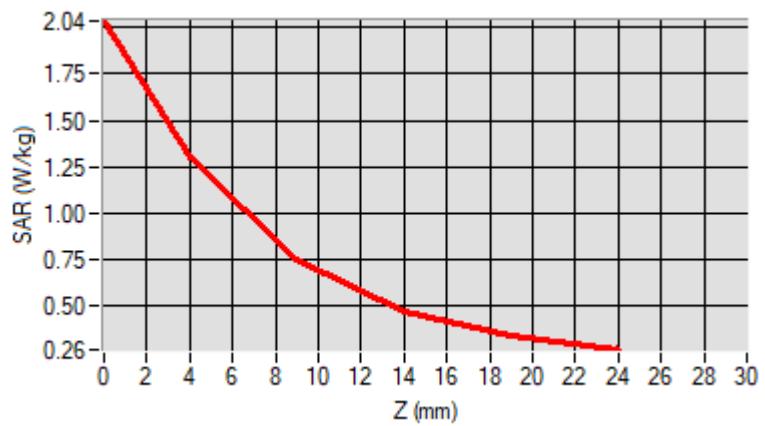
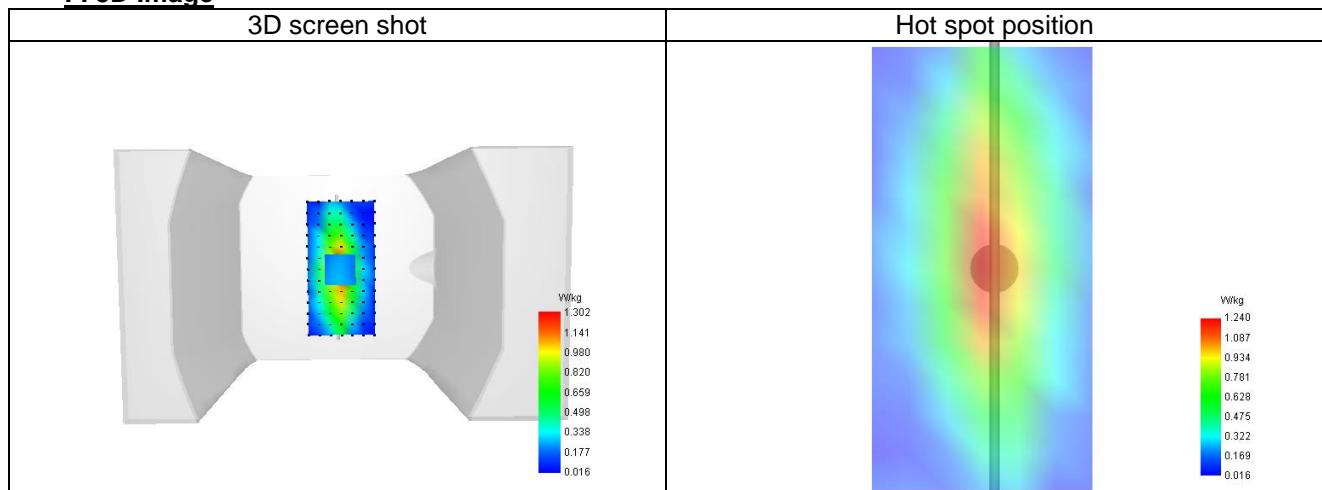


#### D. SAR 1g & 10g

SAR 10g (W/Kg)	1.561
SAR 1g (W/Kg)	2.482
Variation (%)	3.297
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

#### E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.036	1.302	0.747	0.462	0.331

**F. 3D Image**

**System check at 1800 MHz**

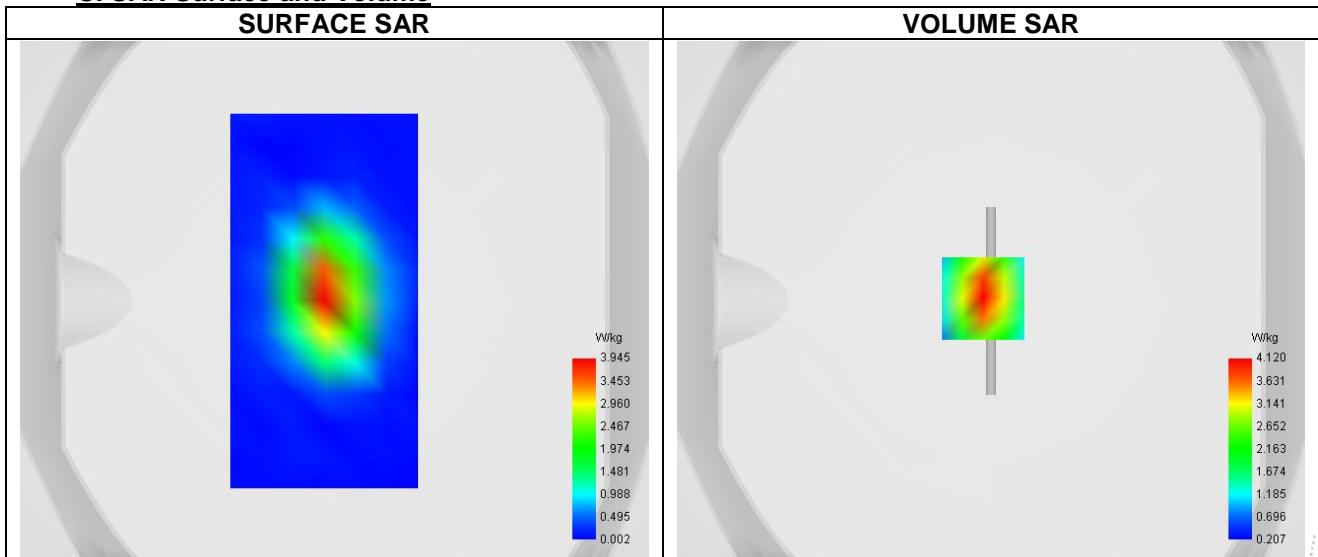
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPGO420
ConvF	0.96
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Dipole
Band	CW1800
Signal	CW

**B. Permittivity**

Frequency (MHz)	1800.000
Relative permitivity (real part)	40.982
Relative permitivity (imaginary part)	15.200
Conductivity (S/m)	1.451

**C. SAR Surface and Volume**


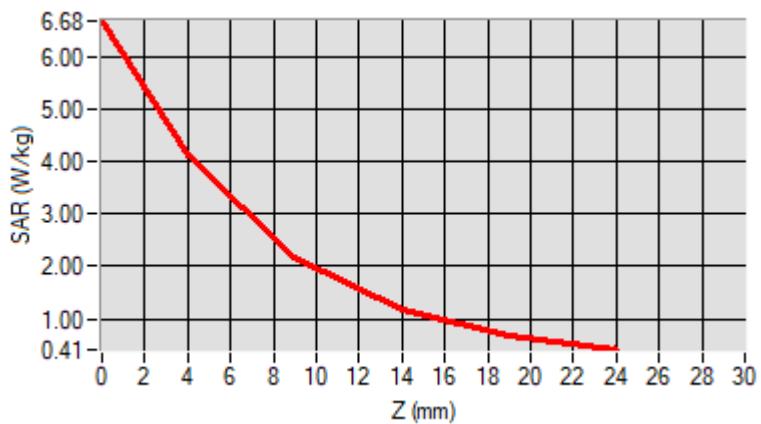
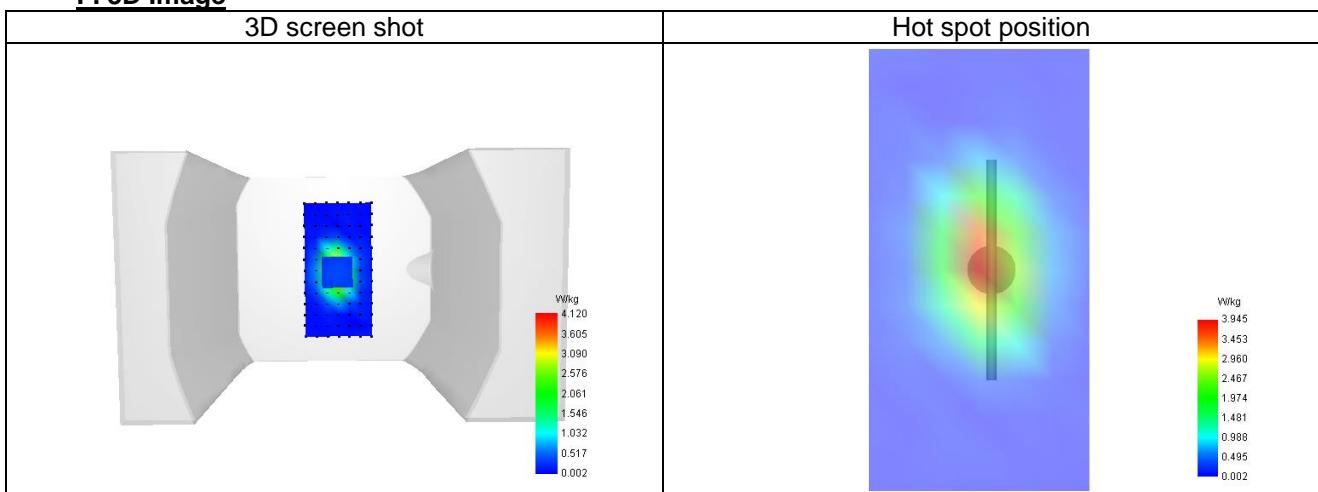
Maximum location: X=-3.00, Y=1.00 ; SAR Peak: 6.69 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	5.271
SAR 1g (W/Kg)	10.019
Variation (%)	4.010
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	6.684	4.120	2.184	1.177	0.685

**F. 3D Image**

**System check at 1900 MHz**

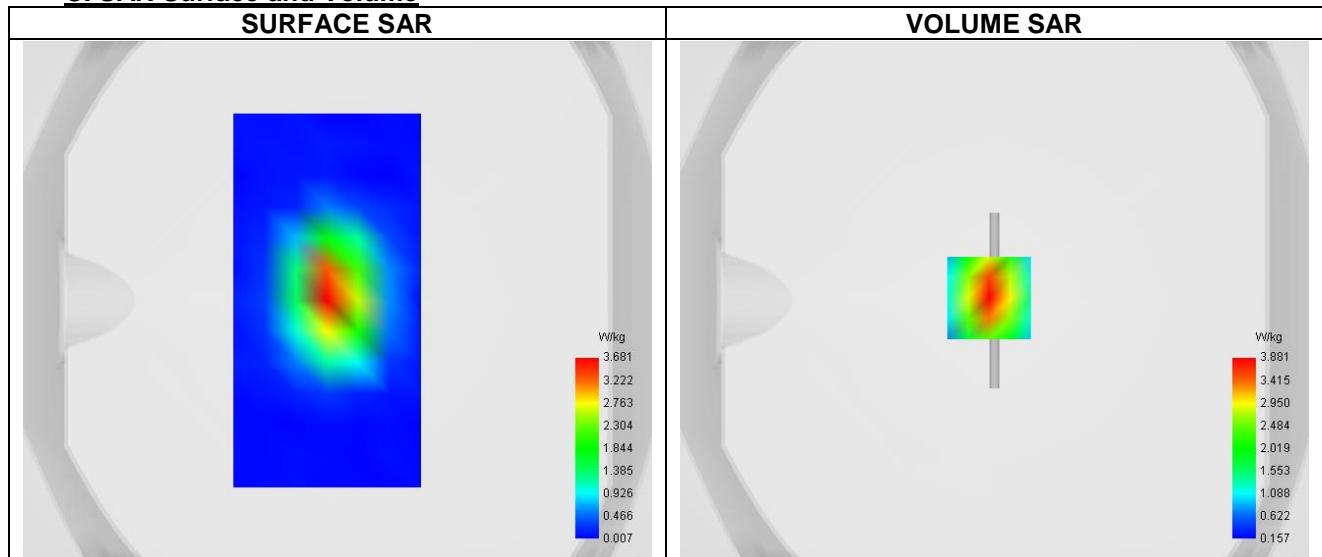
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPG0420
ConvF	1.11
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Dipole
Band	CW1900
Signal	CW

**B. Permittivity**

Frequency (MHz)	1900.000
Relative permittivity (real part)	38.125
Relative permittivity (imaginary part)	14.400
Conductivity (S/m)	1.454

**C. SAR Surface and Volume**


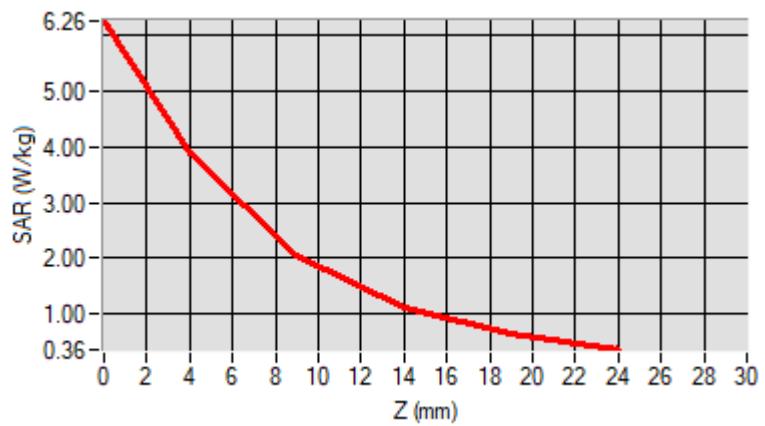
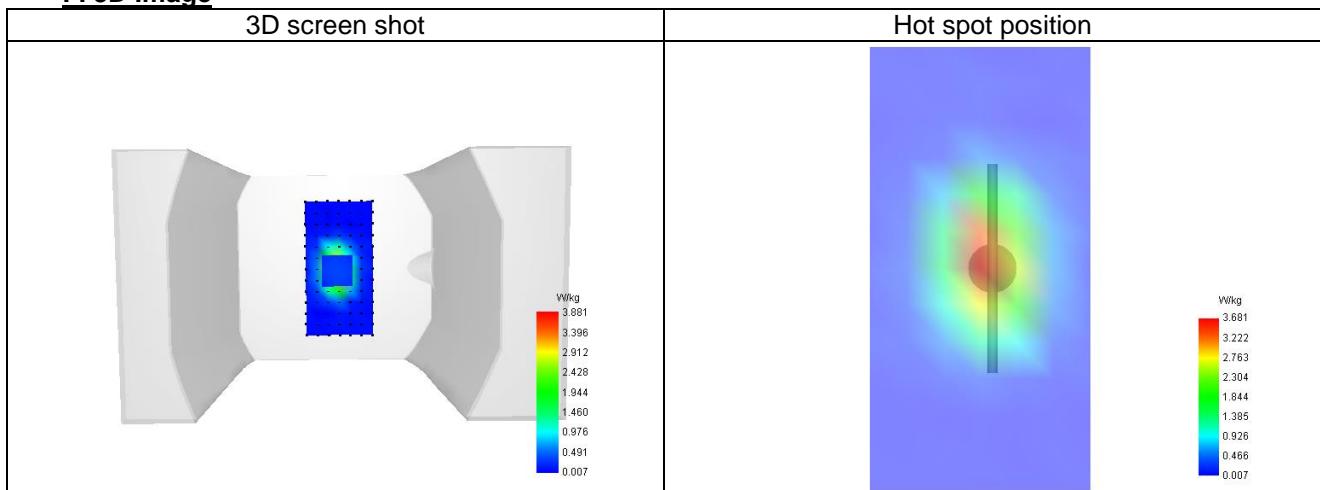
Maximum location: X=-2.00, Y=1.00 ; SAR Peak: 6.27 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	5.266
SAR 1g (W/Kg)	10.636
Variation (%)	0.491
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	6.259	3.881	2.069	1.111	0.634

**F. 3D Image**

## 15.2 SAR Test Graph Results

### Plot 1

Date of measurement: 23/5/2025

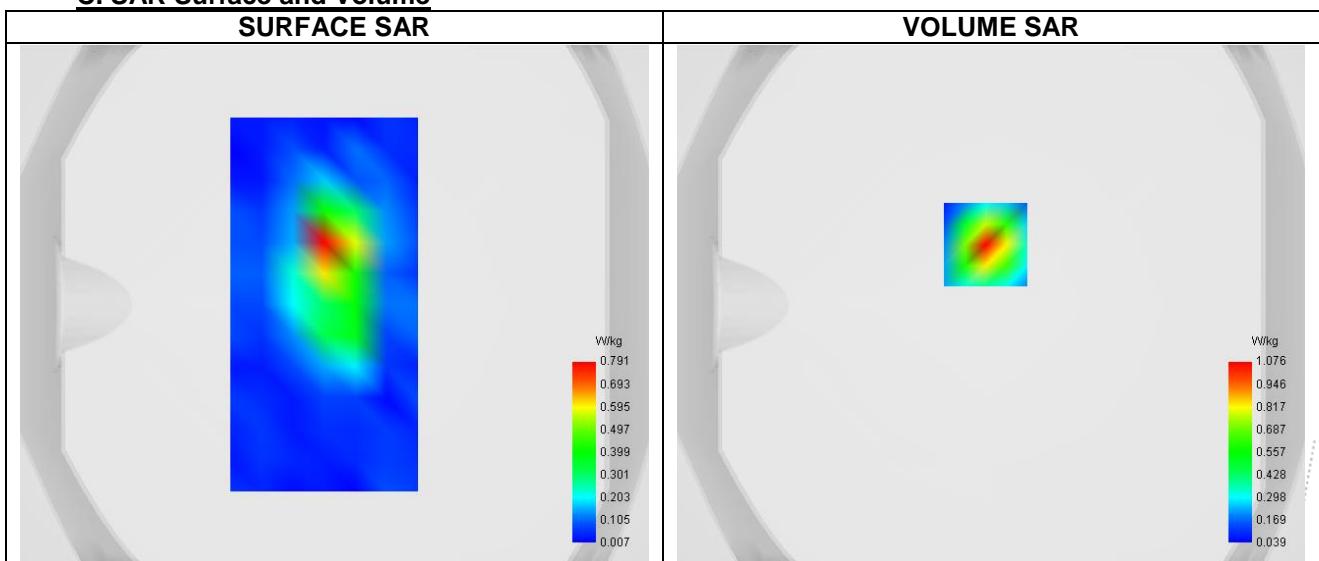
#### A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	0.81
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	GPRS850
Signal	TDMA (GPRS)

#### B. Permittivity

Frequency (MHz)	846.600
Relative permittivity (real part)	42.516
Relative permittivity (imaginary part)	19.400
Conductivity (S/m)	0.908

#### C. SAR Surface and Volume



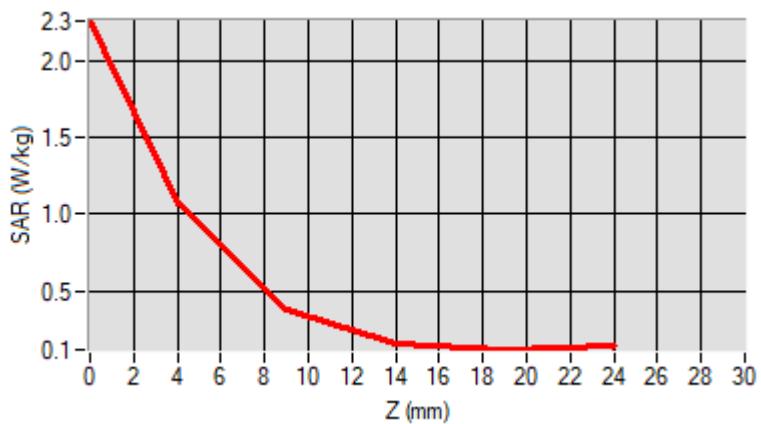
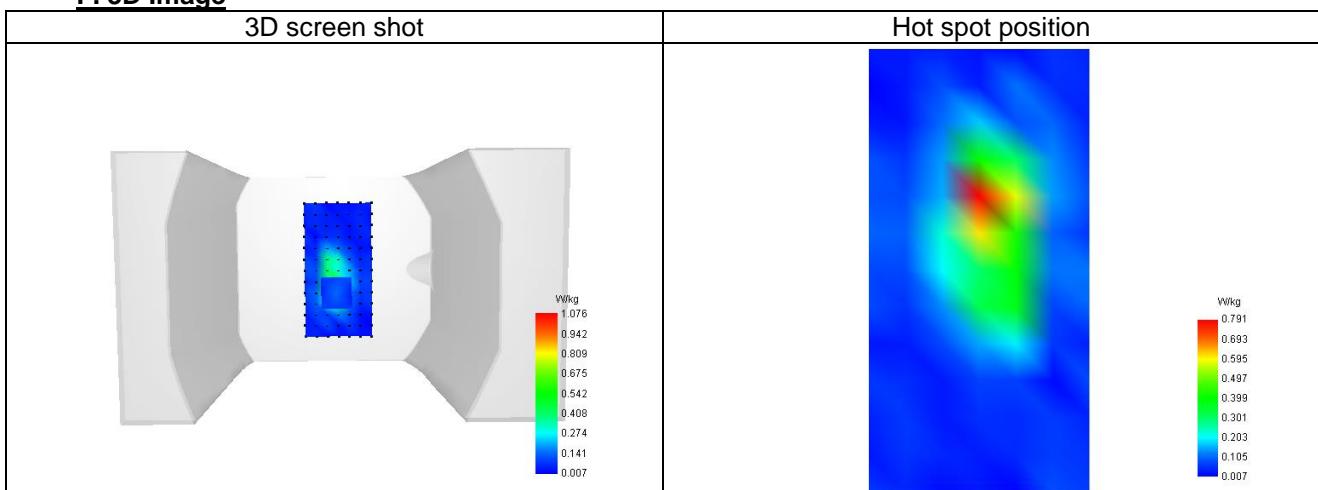
Maximum location: X=-2.00, Y=23.00 ; SAR Peak: 2.25 W/kg

#### D. SAR 1g & 10g

SAR 10g (W/Kg)	0.417
SAR 1g (W/Kg)	0.999
Variation (%)	1.910
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

#### E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.254	1.076	0.384	0.159	0.120

**F. 3D Image**

**Plot 2**

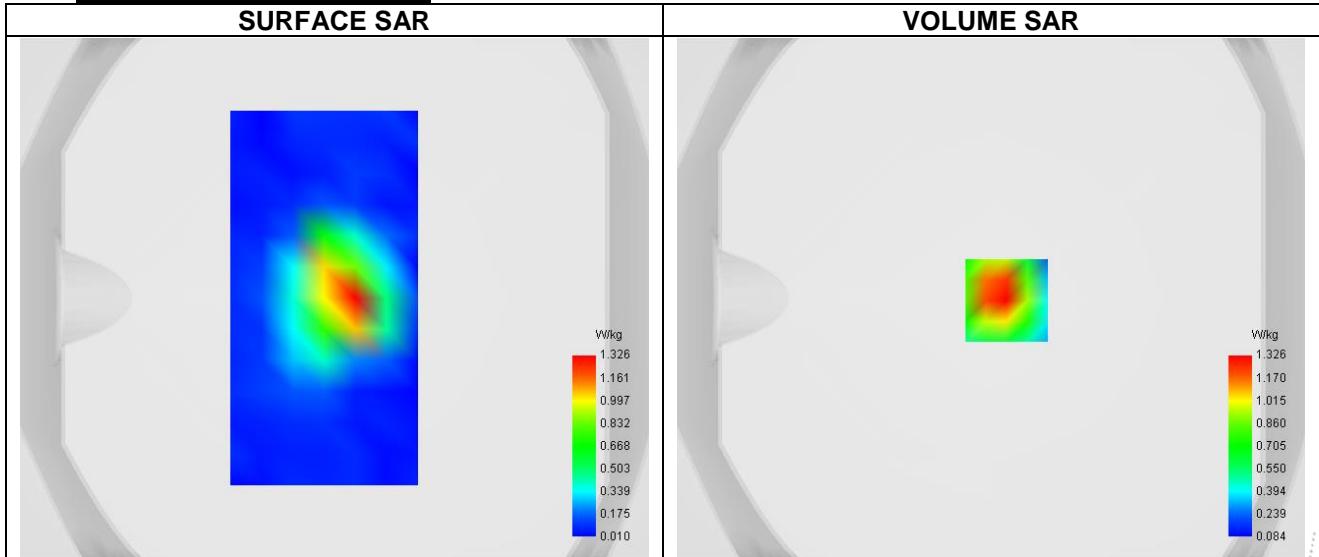
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPGO420
ConvF	1.04
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	GPRS1900
Signal	TDMA (GPRS)

**B. Permittivity**

Frequency (MHz)	1850.200
Relative permitivity (real part)	38.125
Relative permitivity (imaginary part)	13.408
Conductivity (S/m)	1.454

**C. SAR Surface and Volume**


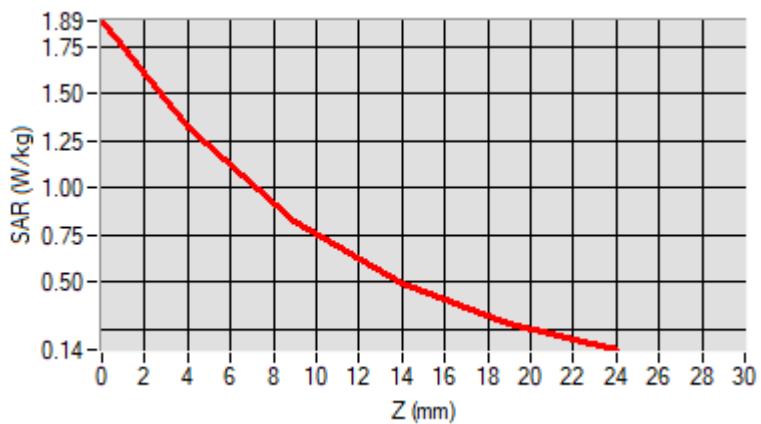
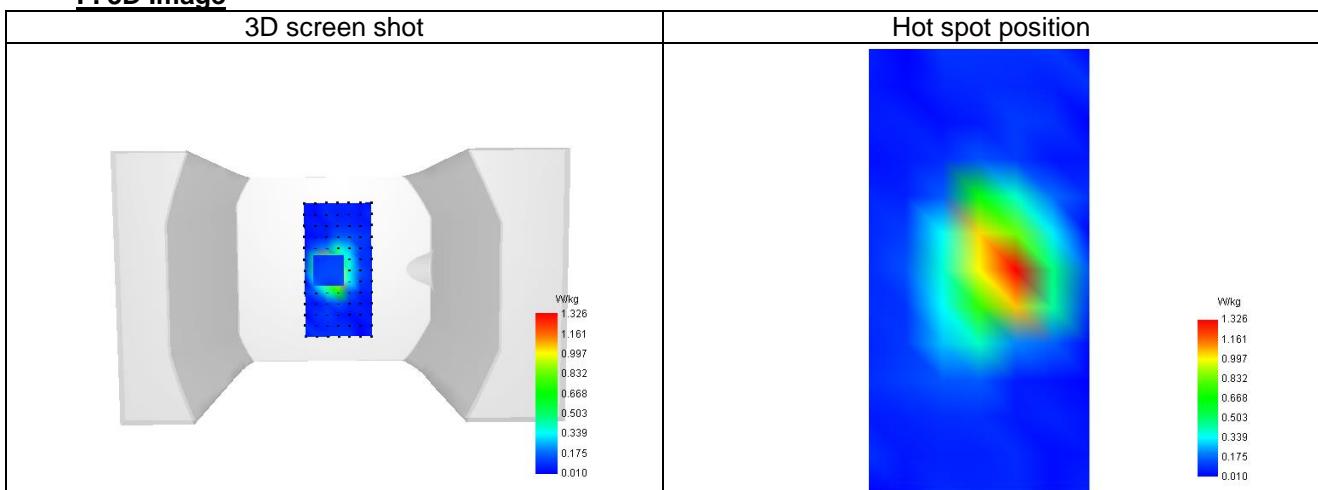
Maximum location: X=6.00, Y=-1.00 ; SAR Peak: 1.95 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	0.702
SAR 1g (W/Kg)	1.260
Variation (%)	2.930
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	1.889	1.326	0.825	0.494	0.281

**F. 3D Image**

**Plot 3**

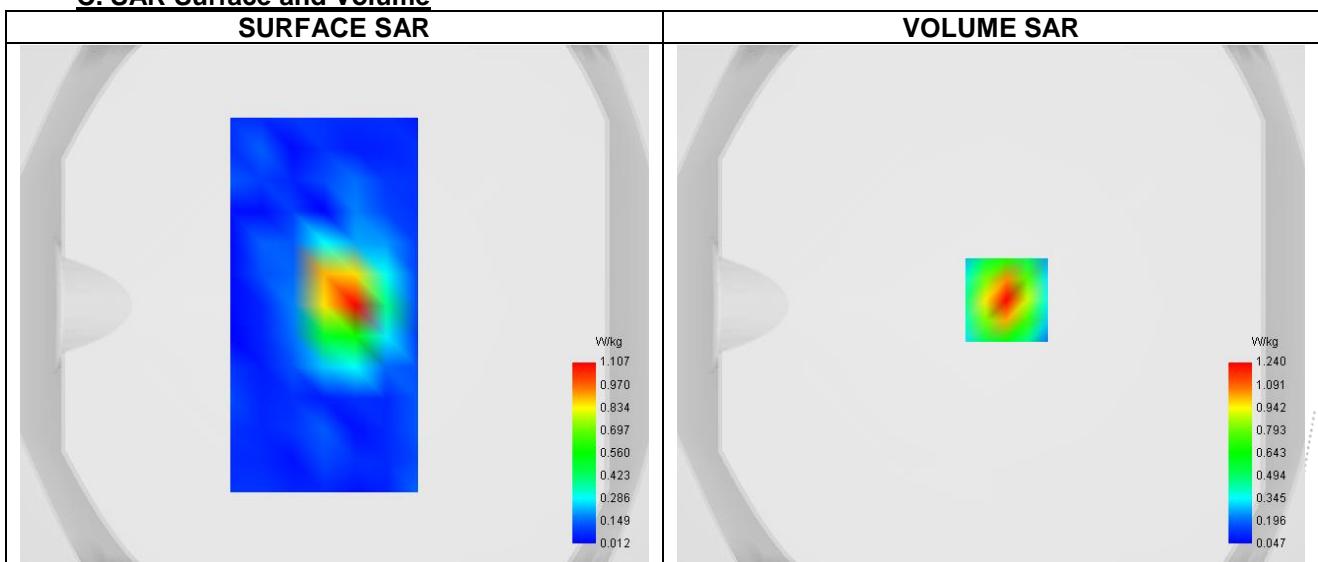
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPGO420
ConvF	1.04
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	LTE band 2
Signal	LTE FDD
Cell Bandwidth	20 Mhz
Modulation	SC-OFDM - QPSK
RB offset	5
RB size	20

**B. Permittivity**

Frequency (MHz)	1860.000
Relative permittivity (real part)	38.125
Relative permittivity (imaginary part)	13.455
Conductivity (S/m)	1.454

**C. SAR Surface and Volume**


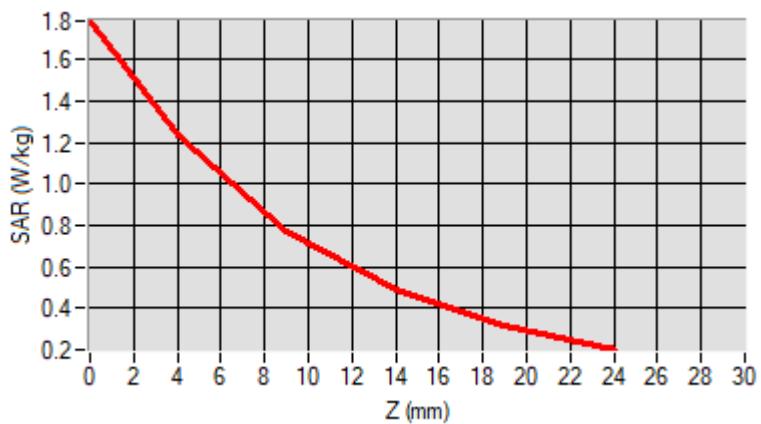
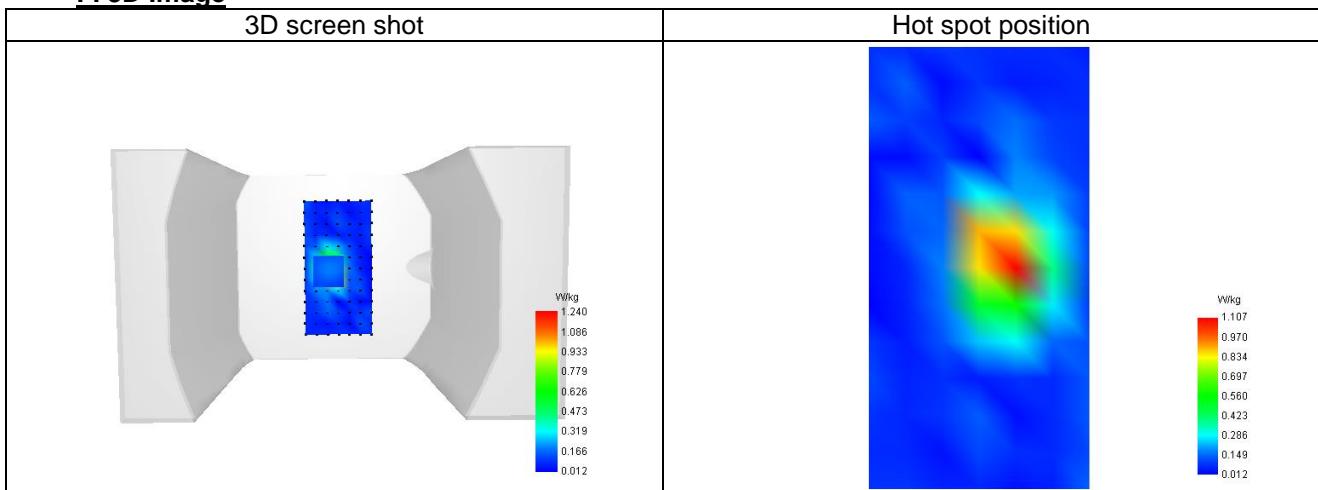
Maximum location: X=6.00, Y=2.00 ; SAR Peak: 1.81 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	0.619
SAR 1g (W/Kg)	1.139
Variation (%)	0.990
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	1.789	1.240	0.774	0.488	0.315

**F. 3D Image**

**Plot 4**

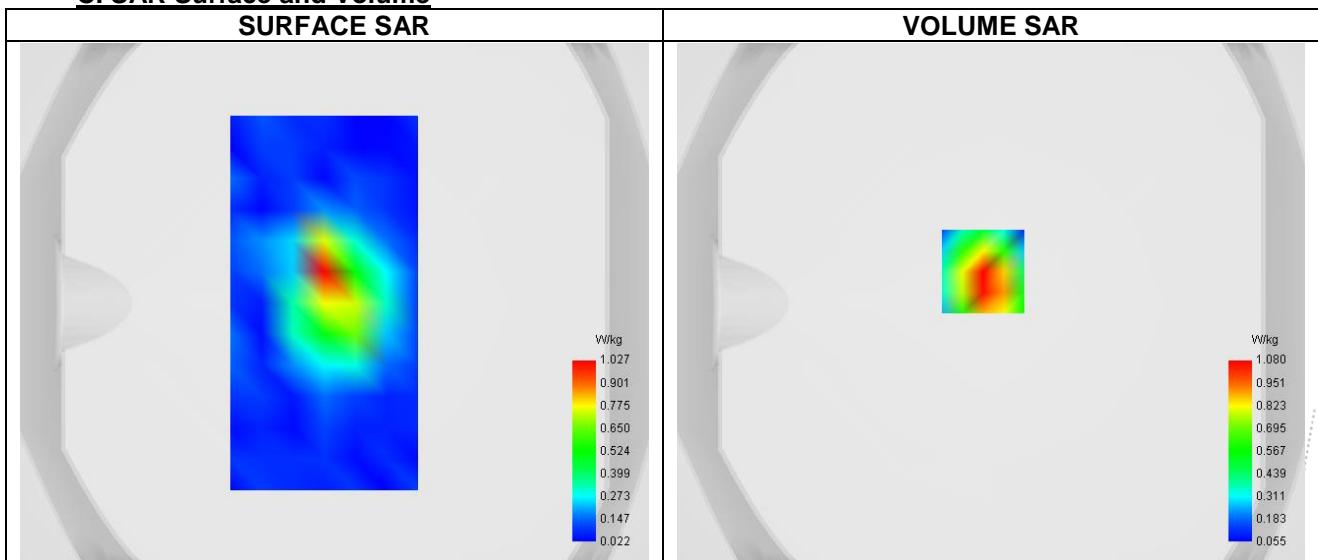
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPGO420
ConvF	0.96
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	LTE band 4
Signal	LTE FDD
Cell Bandwidth	20 Mhz
Modulation	SC-OFDM - QPSK
RB offset	5
RB size	20

**B. Permittivity**

Frequency (MHz)	1732.500
Relative permittivity (real part)	40.982
Relative permittivity (imaginary part)	14.186
Conductivity (S/m)	1.451

**C. SAR Surface and Volume**


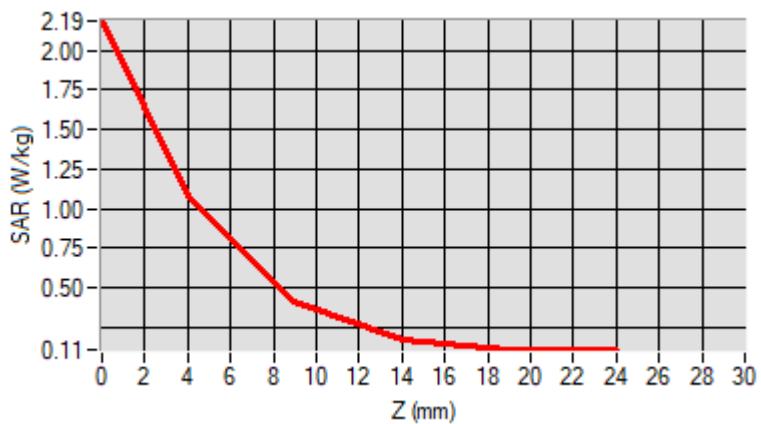
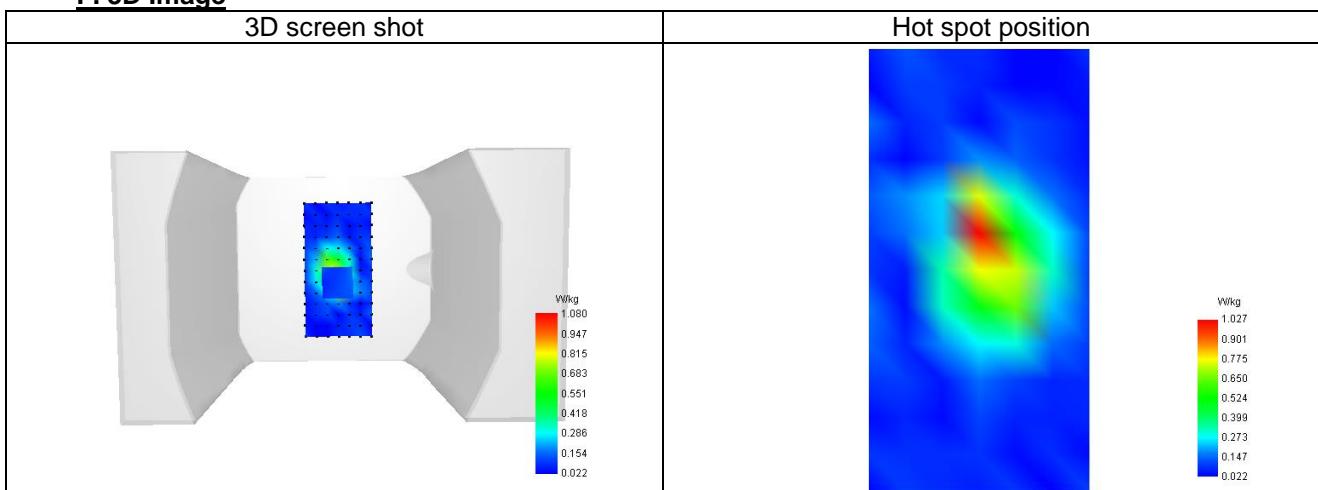
Maximum location: X=-3.00, Y=12.00 ; SAR Peak: 2.24 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	0.471
SAR 1g (W/Kg)	1.056
Variation (%)	2.280
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.186	1.080	0.406	0.168	0.109

**F. 3D Image**

**Plot 5**

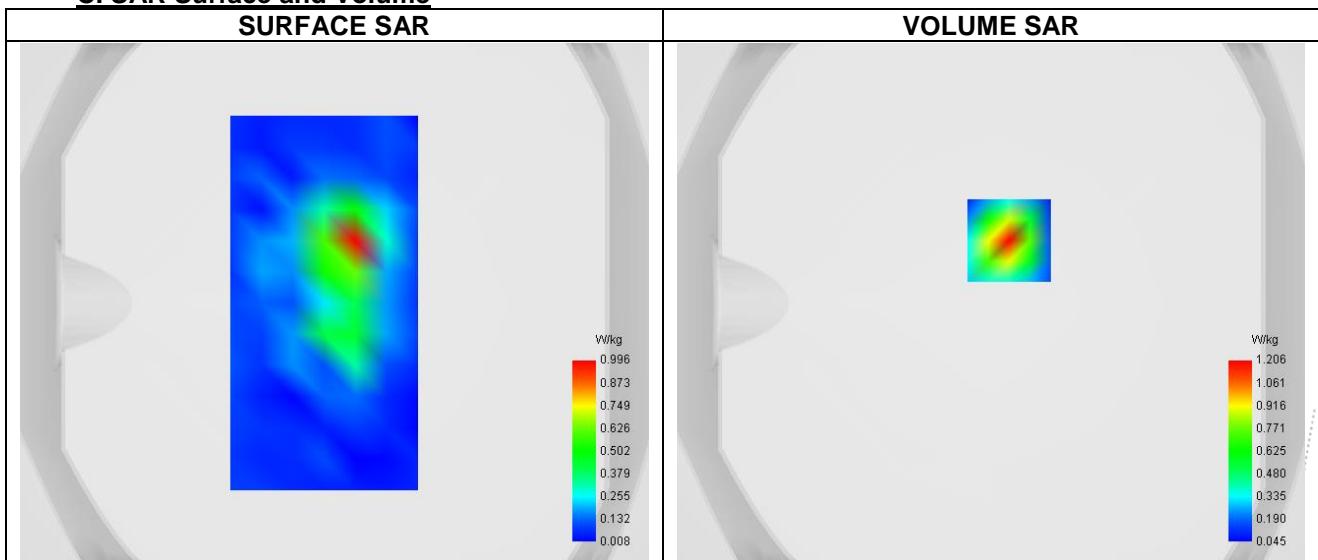
Date of measurement: 23/5/2025

**A. Experimental conditions.**

Probe	SN 26/23 EPGO420
ConvF	0.81
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	LTE band 5
Signal	LTE FDD
Cell Bandwidth	10 Mhz
Modulation	SC-OFDM - QPSK
RB offset	5
RB size	20

**B. Permittivity**

Frequency (MHz)	829.000
Relative permittivity (real part)	42.516
Relative permittivity (imaginary part)	19.580
Conductivity (S/m)	0.908

**C. SAR Surface and Volume**


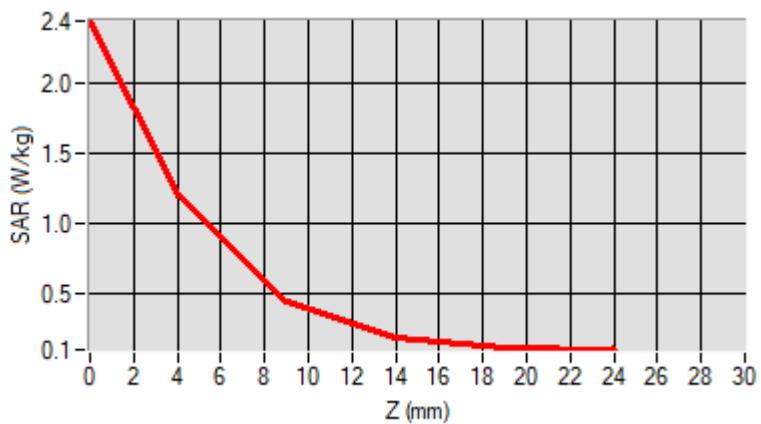
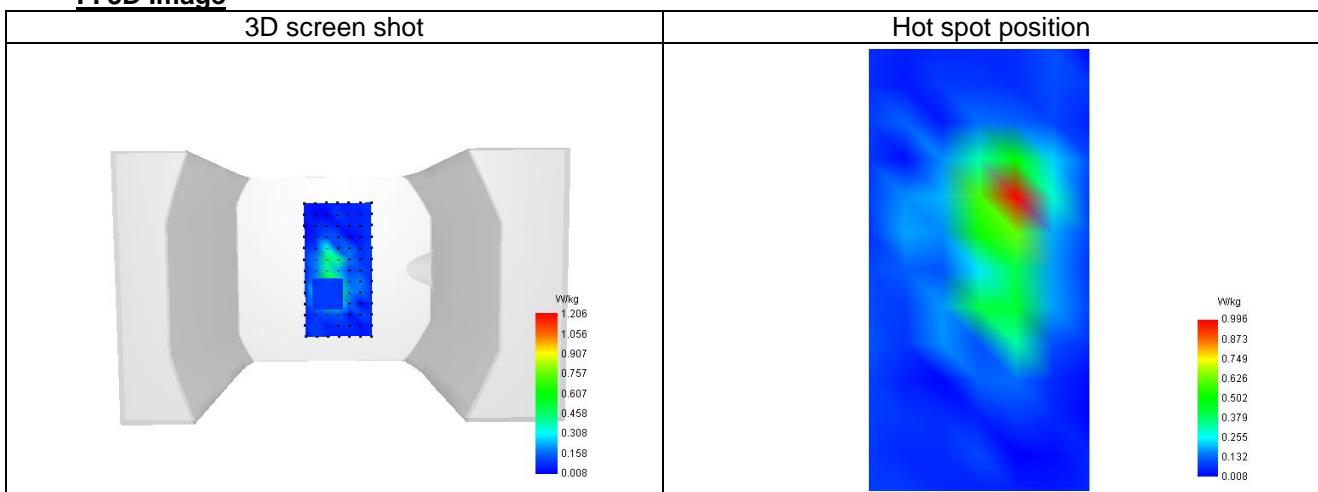
Maximum location: X=7.00, Y=24.00 ; SAR Peak: 2.46 W/kg

**D. SAR 1g & 10g**

SAR 10g (W/Kg)	0.450
SAR 1g (W/Kg)	1.108
Variation (%)	1.330
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

**E. Z Axis Scan**

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.450	1.206	0.448	0.177	0.107

**F. 3D Image**

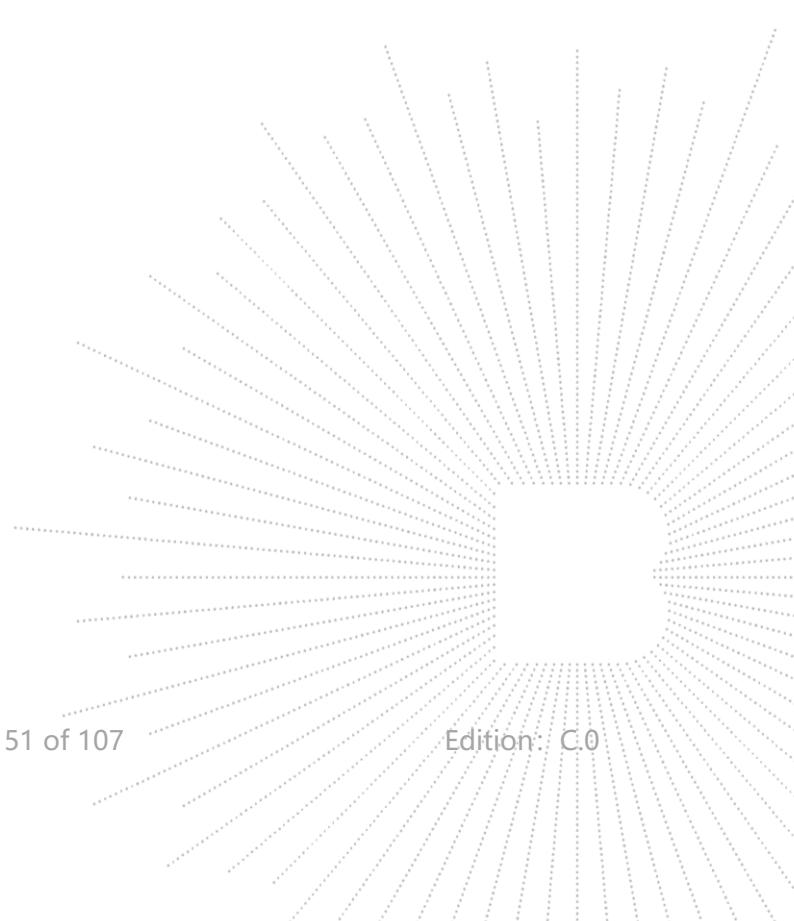
## 16 CALIBRATION CERTIFICATES

**Probe-EPG0420 Calibration Certificate**

**SID835Dipole Calibration Ceriticate**

**SID1800Dipole Calibration Ceriticate**

**SID1900Dipole Calibration Ceriticate**





## COMOSAR E-Field Probe Calibration Report

Ref : ACR.199.1.23.BES.A

**SHENZHEN BCTC TECHNOLOGY CO., LTD.**

**1 ~2/ F, NO. B FACTORY BUILDING, PENGZHOU  
INDUSTRIAL PARK, FUYUAN 1ST ROAD,  
TANGWEI COMMUNITY, FUHAI STREET, BAO'AN  
DISTRICT, SHENZHEN, GUANGDONG, CHINA**

**MVG COMOSAR DOSIMETRIC E-FIELD PROBE  
SERIAL NO.: 2623-EPGO-420**

**Calibrated at MVG**

**Z.I. de la pointe du diable**

**Technopôle Brest Iroise – 295 avenue Alexis de Rochon  
29280 PLOUZANE - FRANCE**

**Calibration date: 7/18/2024**



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### *Summary:*

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).

*Page: 1/11*



	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Cyrille ONNEE	Measurement Responsible	7/18/2024	
<i>Checked &amp; approved by:</i>	Jérôme Luc	Technical Manager	7/18/2024	
<i>Authorized by:</i>	Yann Toutain	Laboratory Director	7/18/2024	

**Yann**
**Toutain ID**

Signature numérique  
de Yann Toutain ID  
Date : 2024.07.18  
10:38:49 +02:00

	<i>Customer Name</i>
<i>Distribution :</i>	Shenzhen BCTC Technology Co., Ltd.

<i>Issue</i>	<i>Name</i>	<i>Date</i>	<i>Modifications</i>
A	Cyrille ONNEE	7/18/2024	Initial release

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## 1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	2623-EPGO-420
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.228 MΩ Dipole 2: R2=0.238 MΩ Dipole 3: R3=0.230 MΩ

## 2 PRODUCT DESCRIPTION

### 2.1 GENERAL INFORMATION

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



**Figure 1 – MVG COMOSAR Dosimetric E field Probe**

Probe Length	330 mm
Length of Individual Dipoles	24.5 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	2.55 mm
Distance between dipoles / probe extremity	12.7 mm

## 3 MEASUREMENT METHOD

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

### 3.1 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards for frequency range 600-7500MHz and using the calorimeter cell method (transfer method) as outlined in the standards for frequency 150-450 MHz.

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### 3.2 LINEARITY

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

### 3.3 ISOTROPY

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

### 3.4 BOUNDARY EFFECT

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

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

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

where

- SAR<sub>uncertainty</sub> is the uncertainty in percent of the probe boundary effect
- $d_{be}$  is the distance between the surface and the closest *zoom-scan* measurement point, in millimetre
- $\Delta_{\text{step}}$  is the separation distance between the first and second measurement points that are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible
- $\delta$  is the minimum penetration depth in millimetres of the head tissue-equivalent liquids defined in this standard, i.e.,  $\delta \approx 14$  mm at 3 GHz;
- $\Delta \text{SAR}_{\text{be}}$  in percent of SAR is the deviation between the measured SAR value, at the distance  $d_{be}$  from the boundary, and the analytical SAR value.

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

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#### 4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with a SAR probe calibration using the waveguide or calorimetric cell technique depending on the frequency.

The estimated expanded uncertainty ( $k=2$ ) in calibration for SAR (W/kg) is  $+/-11\%$  for the frequency range 150-450MHz.

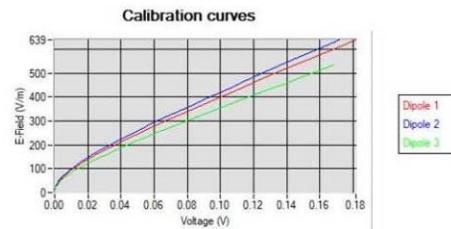
The estimated expanded uncertainty ( $k=2$ ) in calibration for SAR (W/kg) is  $+/-14\%$  for the frequency range 600-7500MHz.

#### 5 CALIBRATION RESULTS

Ambient condition	
Liquid Temperature	20 $+/- 1$ °C
Lab Temperature	20 $+/- 1$ °C
Lab Humidity	30-70 %

##### 5.1 CALIBRATION IN AIR

The following curve represents the measurement in waveguide of the voltage picked up by the probe toward the E-field generated inside the waveguide.



From this curve, the sensitivity in air is calculated using the below formula.

$$E^2 = \sum_{i=1}^3 \frac{V_i (1 + V_i / DCP_i)}{Norm_i}$$

where

$V_i$ =voltage readings on the 3 channels of the probe

$DCP_i$ =diode compression point given below for the 3 channels of the probe

$Norm_i$ =dipole sensitivity given below for the 3 channels of the probe

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Normx dipole 1 ( $\mu\text{V}/(\text{V}/\text{m})^2$ )	Normy dipole 2 ( $\mu\text{V}/(\text{V}/\text{m})^2$ )	Normz dipole 3 ( $\mu\text{V}/(\text{V}/\text{m})^2$ )
1.21	1.09	1.56

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
106	109	103

### 5.2 CALIBRATION IN LIQUID

The calorimeter cell or the waveguide is used to determine the calibration in liquid using the formula below.

$$ConvF = \frac{E_{liquid}^2}{E_{air}^2}$$

The E-field in the liquid is determined from the SAR measurement according to the below formula.

$$E_{liquid}^2 = \frac{\rho SAR}{\sigma}$$

where

$\sigma$ =the conductivity of the liquid

$\rho$ =the volumetric density of the liquid

SAR=the SAR measured from the formula that depends on the setup used. The SAR formulas are given below

For the calorimeter cell (150-450 MHz), the formula is:

$$SAR = c \frac{dT}{dt}$$

where

c=the specific heat for the liquid

$dT/dt$ =the temperature rises over the time

For the waveguide setup (600-75000 MHz), the formula is:

$$SAR = \frac{4P_w}{ab\delta} e^{-\frac{2z}{\delta}}$$

where

a=the larger cross-sectional of the waveguide

b=the smaller cross-sectional of the waveguide

$\delta$ =the skin depth for the liquid in the waveguide

Pw=the power delivered to the liquid

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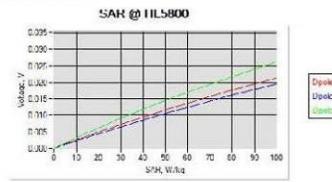
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The below table summarize the ConvF for the calibrated liquid. The curves give examples for the measured SAR depending on the voltage in some liquid.

Liquid	Frequency (MHz*)	ConvF
HL450	450	0.86
BL450	450	0.78
HL750	750	0.80
BL750	750	0.87
HL850	835	0.81
BL850	835	0.80
HL900	900	0.76
BL900	900	0.87
HL1800	1800	0.96
BL1800	1800	1.01
HL1900	1900	1.04
BL1900	1900	1.11
HL2100	2100	1.00
BL2100	2100	1.16
HL2300	2300	1.11
BL2300	2300	1.23
HL2450	2450	1.11
BL2450	2450	1.32
HL2600	2600	1.03
BL2600	2600	1.19
HL5200	5200	1.18
BL5200	5200	0.97
HL5400	5400	1.17
BL5400	5400	1.00
HL5600	5600	1.20
BL5600	5600	0.95
HL5800	5800	1.15
BL5800	5800	1.05

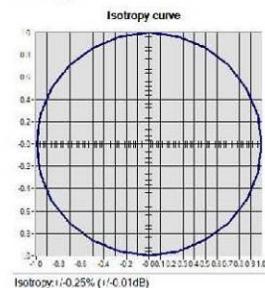
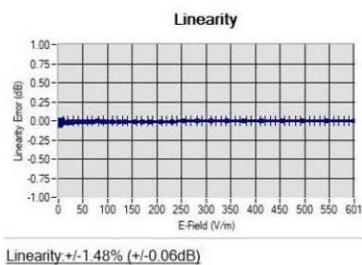
(\* Frequency validity is +/-50MHz below 600MHz, +/-100MHz from 600MHz to 5GHz and +/-700MHz above 6GHz





## 6 VERIFICATION RESULTS

The figures below represent the measured linearity and axial isotropy for this probe. The probe specification is +/-0.2 dB for linearity and +/-0.15 dB for axial isotropy.



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## 7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2024	08/2027
Network Analyzer	Agilent 8753ES	MY40003210	10/2023	10/2027
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2025
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2024	06/2027
Power Meter	Keysight U2000A	SN: MY62340002	10/2022	10/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Fluoroptic Thermometer	LumaSense Luxtron 812	94264	09/2022	09/2025
Coaxial cell	MVG	SN 32/16 COAXCELL	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG2_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G600	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.

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