

# TEST REPORT

Report No.: BCTC2308023906E

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Applicant: Multi-Voice Radio LLC

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Product Name: MV-PAC

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Model/Type Ref.: MV2P

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Tested Date: 2023-08-10 to 2023-08-18

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Issued Date: 2023-08-22

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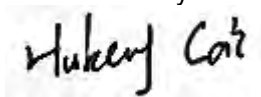
**Shenzhen BCTC Testing Co., Ltd.**



## FCC ID: ALZM2P

Product Name: MV-PAC  
Trademark: N/A  
Model/Type Ref.: MV2P  
Applicant: Multi-Voice Radio LLC  
Address: 266e 900s, Mapleton, Utah, United States 84664  
Manufacturer: Multi-Voice Radio LLC  
Address: 266e 900s, Mapleton, Utah, United States 84664  
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: 2023-06-14  
Sample tested Date: 2023-08-10 to 2023-08-18  
Issue Date: 2023-08-22  
SAR Max. Values is: 1.308 W/kg (1g) for Body  
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:



Hubery Cai/Project Handler

Approved by:



Zero Zhou/Reviewer

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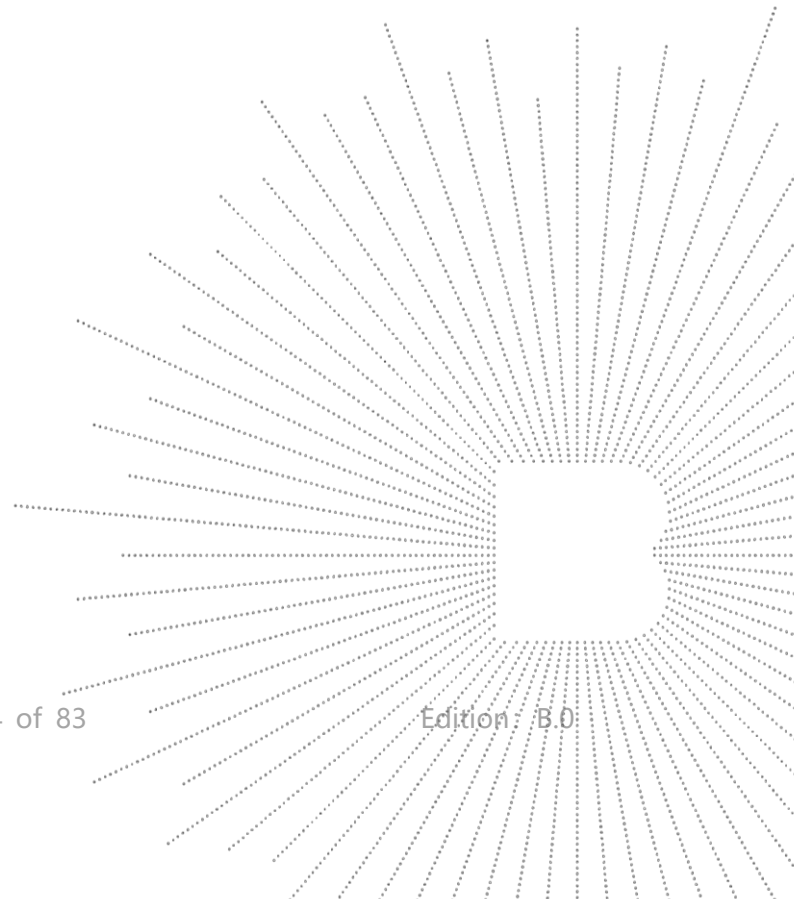
## Table Of Content

Test Report Declaration	Page
1. Version .....	5
2. Test Standards .....	6
3. Test Summary .....	7
4. SAR Limits .....	8
5. Measurement Uncertainty .....	9
6. Product Information and Test Setup .....	10
6.1 Product Information .....	10
6.2 Test Setup Configuration .....	11
6.3 Support Equipment .....	11
6.4 Test Environment .....	11
7. Test Facility and Test Instrument Used .....	12
7.1 Test Facility .....	12
7.2 Test Instrument Used .....	12
8. Specific Absorption Rate (SAR) .....	14
8.1 Introduction .....	14
8.2 SAR Definition .....	14
9. SAR Measurement System .....	15
9.1 The Measurement System .....	15
9.2 Probe .....	15
9.3 Probe Calibration Process .....	17
9.4 Phantom .....	18
9.5 Device Holder .....	18
10. Tissue Simulating Liquids .....	19
10.1 Composition of Tissue Simulating Liquid .....	19
10.2 Limit .....	20
10.3 Tissue Calibration Result .....	21
11. System Check .....	22
11.1 Purpose of System Performance Check .....	22
11.2 System Setup .....	22
11.3 Validation Results .....	23
12. EUT Testing Position .....	24
Body-worn Position .....	24
13. SAR Measurement Procedures .....	25
13.1 Measurement Procedures .....	25
13.2 Spatial Peak SAR Evaluation .....	25
13.3 Area & Zoom Scan Procedures .....	26
13.4 Volume Scan Procedures .....	27
13.5 SAR Averaged Methods .....	27
13.6 Power Drift Monitoring .....	27
14. SAR Test Result .....	28
14.1 Conducted RF Output Power .....	28
14.2 Transmit Antennas and SAR Measurement Position .....	30
14.3 Measured and Reported (Scaled) SAR Results .....	31

14.4 SAR Measurement Variability .....	32
14.5 Simultaneous Transmission Evaluation .....	33
15. Test Plots .....	34
15.1 System Performance Check .....	34
15.2 SAR Test Graph Results .....	38
16. CALIBRATION CERTIFICATES.....	42
17. EUT Photographs .....	80
18. EUT Test Setup Photographs.....	82

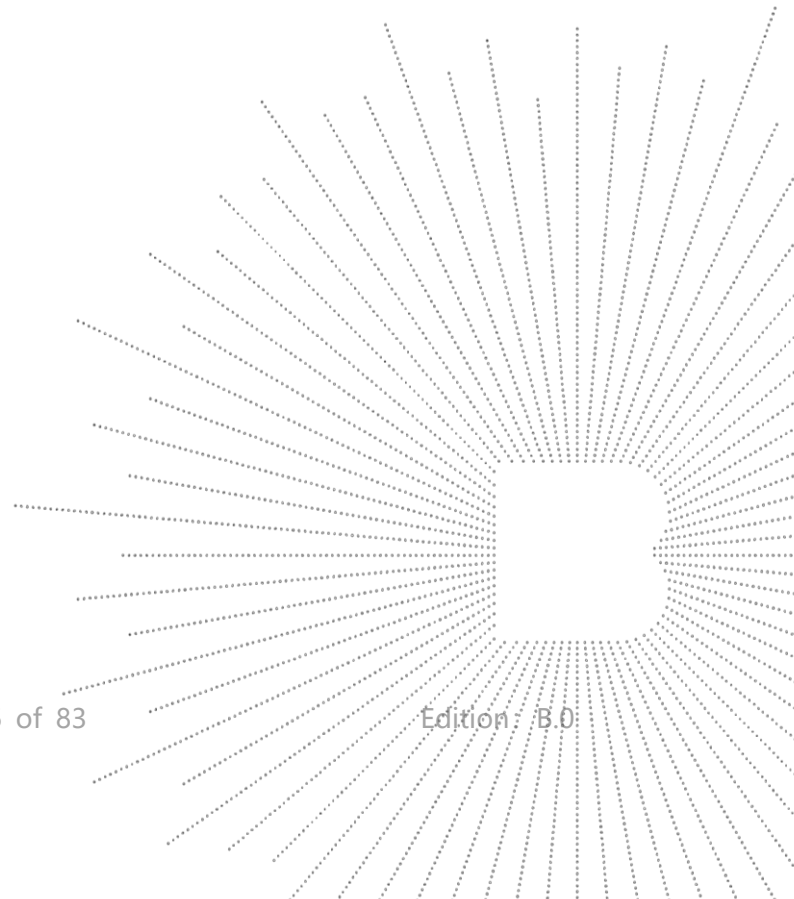
(Note: N/A Means Not Applicable)

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**1. Version**

Report No.	Issue Date	Description	Approved
BCTC2308023906E	2023-08-22	Original	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

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### 3. Test Summary

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

Frequency Band	Report SAR <sub>1g</sub> (W/kg)	SAR <sub>1g</sub> Limit (W/kg)
	Body (0mm Gap)	
RFID	1.308	1.6
Bluetooth	0.229	1.6
Simultaneous Transmission	1.537	1.6

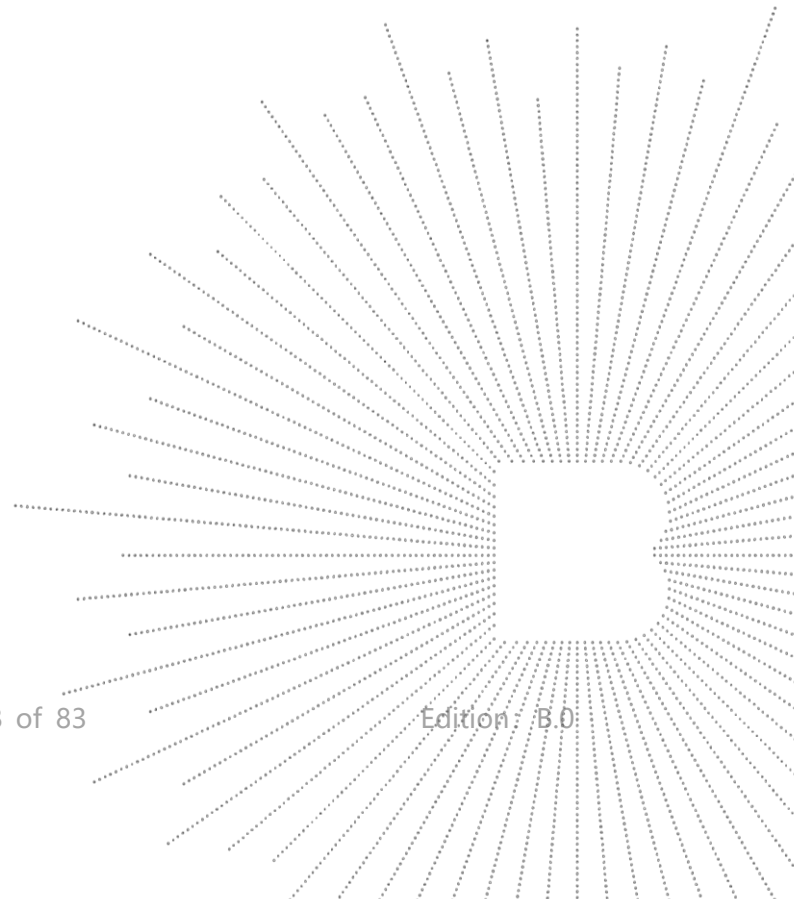
The device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2019, and had been tested in accordance with the measurement methods and procedure specified in IEEE 1528-2013.

#### 4. SAR Limits

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

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

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

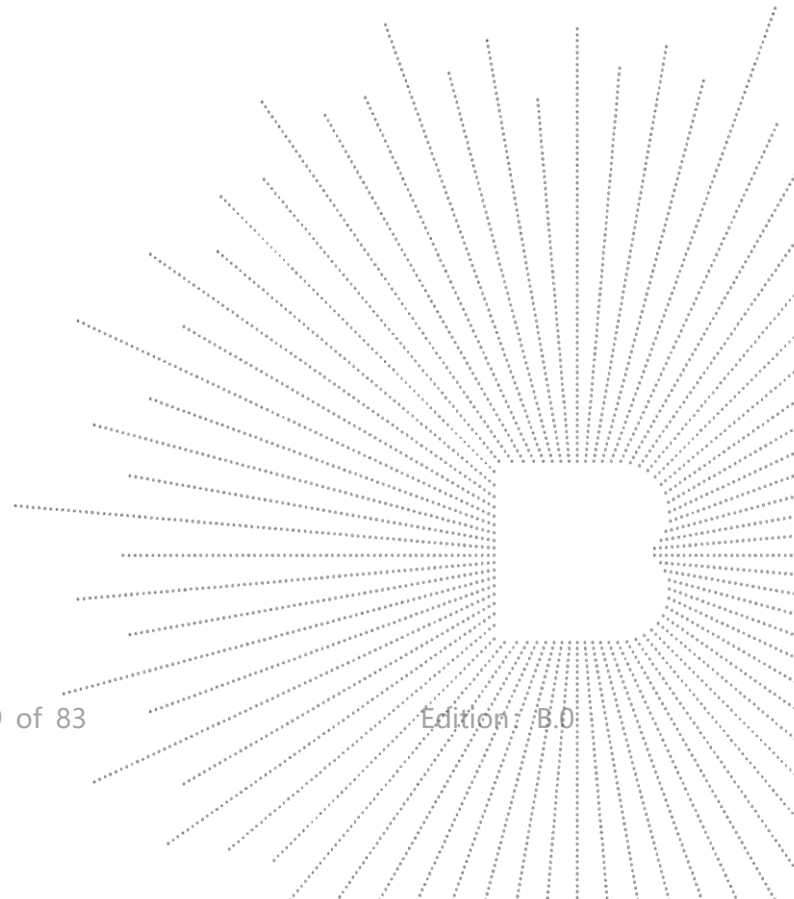




## 5. Measurement Uncertainty

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:	MV2P
Model differences:	N/A
Hardware Version:	04
Software Version:	02
Ratings:	USB: DC 5V Battery: DC 3.7V

BT	
Bluetooth Version:	4.2, 5.0
Operation Frequency:	2402-2480MHz
Type of Modulation:	GFSK, $\pi/4$ DQPSK, 8DPSK
Number Of Channel	79CH
Antenna installation:	Shrapnel antenna*2
Antenna Gain:	ANT A: 1.83dBi ANT B: 2.1dBi
RFID	
Operation Frequency:	902.82MHz -926.9MHz
Type of Modulation:	ASK
Number Of Channel	50 CH
Antenna installation:	Shrapnel antenna
Antenna Gain:	-2.3dBi

## 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	Aug. 29, 2022	Aug. 28, 2023
Multimeter	Keithley	1160271	\	Nov. 10, 2022	Nov 09, 2023
S-parameter Network Analyzer	R&S	ZVB 8	101353	Dec. 07, 2022	Dec. 06, 2023
Wideband Radio Communication Tester	R&S	CMW500	\	Nov. 10, 2022	Nov 09, 2023
E SAR PROBE 6GHz	MVG	SSE2	2623-EPGO-420	July 18, 2023	July 17, 2024
DIPOLE 900	SATIMO	SID 900	SN 47/21 DIP 0G900-622	Nov. 25, 2021	Nov. 24, 2024
DIPOLE 2450	SATIMO	SID 2450	SN 47/21 DIP 2G450-627	Nov. 25, 2021	Nov. 24, 2024
COMOSAR OPENCoaxial Probe	SATIMO	\	\	Nov. 18, 2022	Nov. 17, 2023
SAR Locator	SATIMO	\	\	Nov. 18, 2022	Nov. 17, 2023
Communication Antenna	SATIMO	\	\	Nov. 18, 2022	Nov. 17, 2023
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	Agilent	E4419	\	May 15, 2023	May 14, 2024
Power meter	Agilent	E4419	\	May 15, 2023	May 14, 2024
Power sensor	Agilent	E9300A	\	May 15, 2023	May 14, 2024
Power sensor	Agilent	E9300A	\	May 15, 2023	May 14, 2024
Directional Coupler	Krytar 158020	131467	\	Nov. 10, 2022	Nov 09, 2023

**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.

Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

## 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:

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

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

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

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

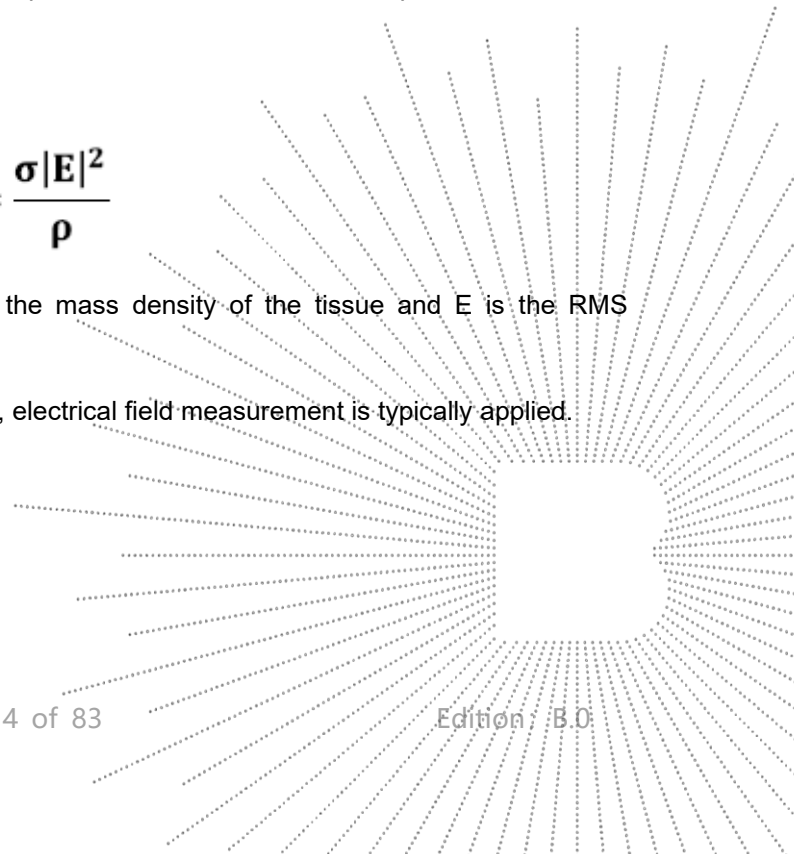
Where: C is the specific heat capacity,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the

electrical field in the tissue by

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

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.

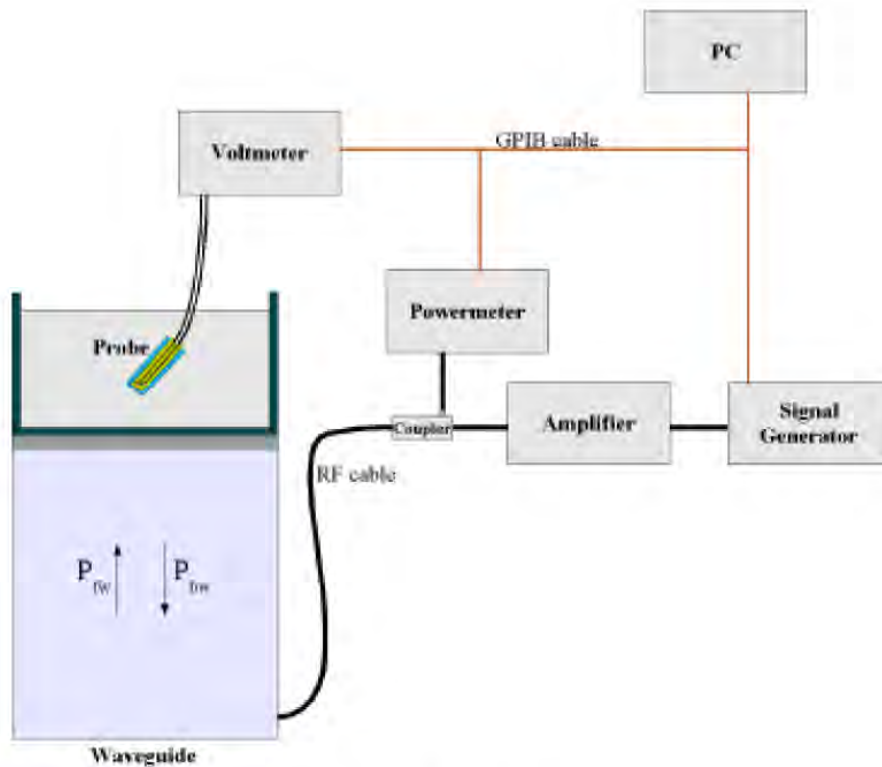
### 9.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SN 46/21 EPG0362 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.



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

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:

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

$\Delta t$  = 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.

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

Where:

$\sigma$  = simulated tissue conductivity,

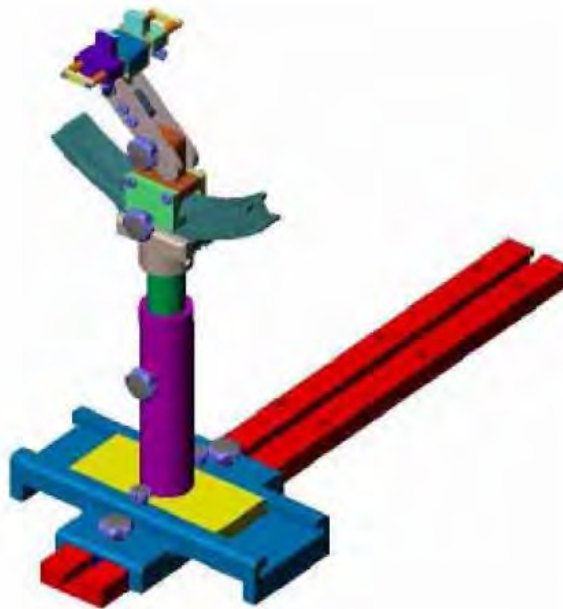
$\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

## 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

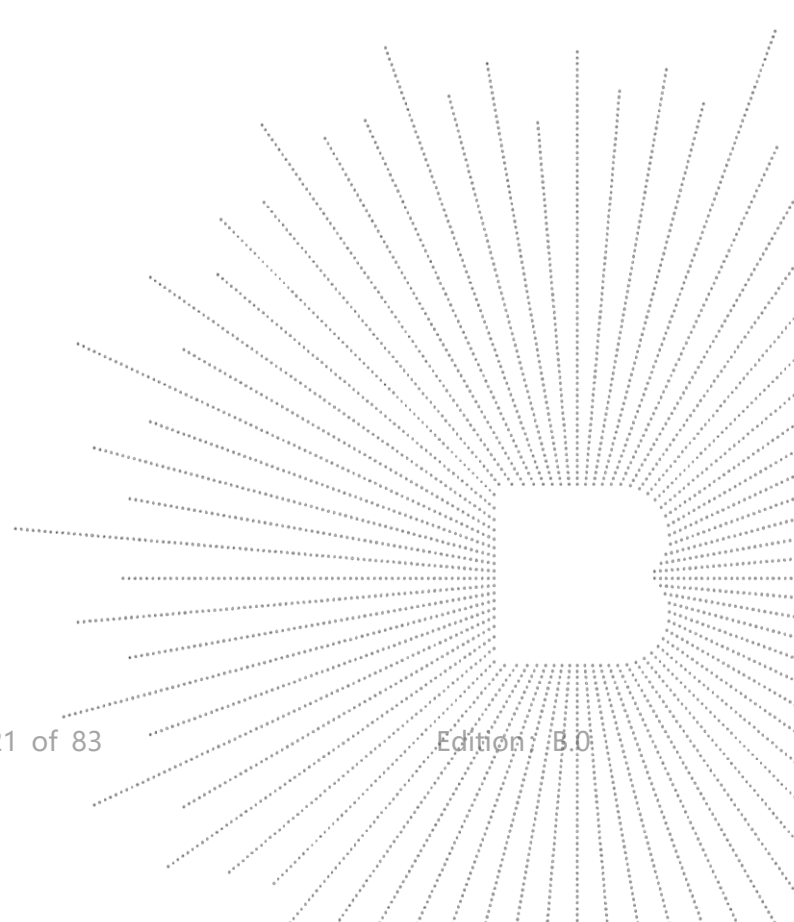
The dielectric parameters of the liquids were verified prior to the SAR evaluation using an R&S ZVB 8. Dielectric Probe Kit and an Agilent Network Analyzer.

Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

Frequency (MHz)	Liquid	Target Conductivity ( $\sigma$ )	Target Permittivity ( $\epsilon_r$ )	Measured Conductivity ( $\sigma$ )	Measured Permittivity ( $\epsilon_r$ )	Delta ( $\sigma$ )%	Delta ( $\epsilon_r$ )%	Limit (%)	Temp . TSL (°C)	Date
900	Head	0.97	41.5	0.947	41.022	-2.37	-1.15	±5	23.0	08/18/2023
2450	Head	1.80	39.2	1.753	38.681	-2.61	-1.32	±5	23.4	08/10/2023

**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.



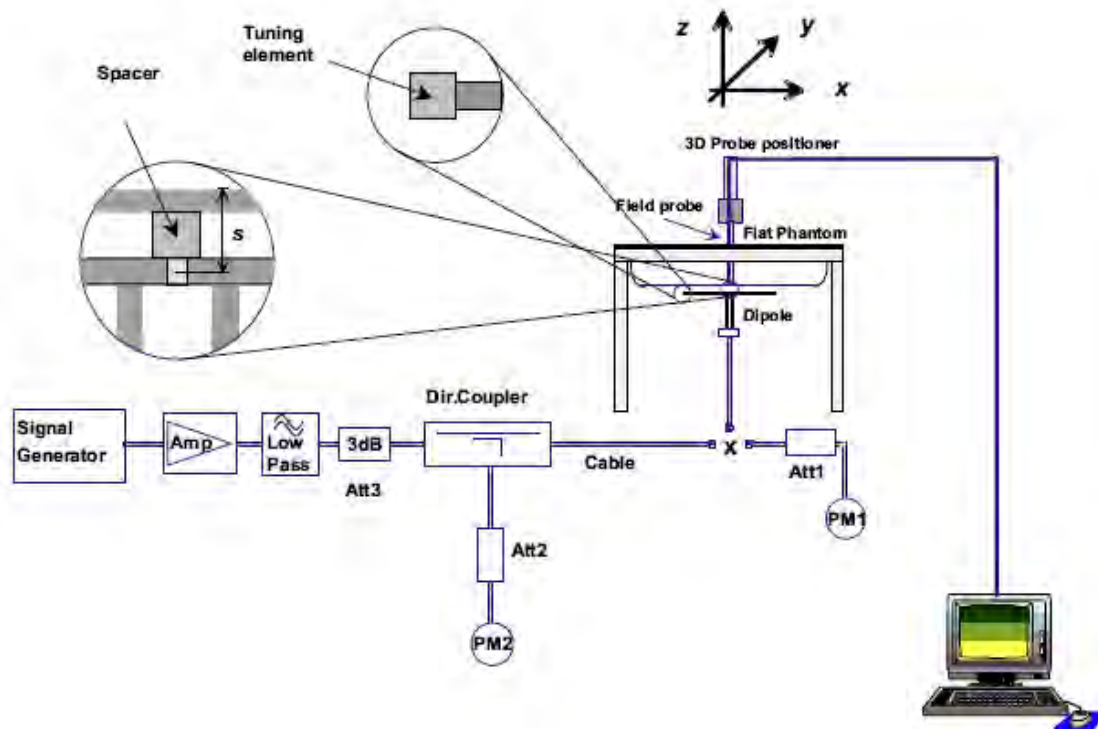
## 11. System Check

### 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.



System Verification Setup Block Diagram





Setup Photo of Dipole Antenna

### 11.3 Validation Results

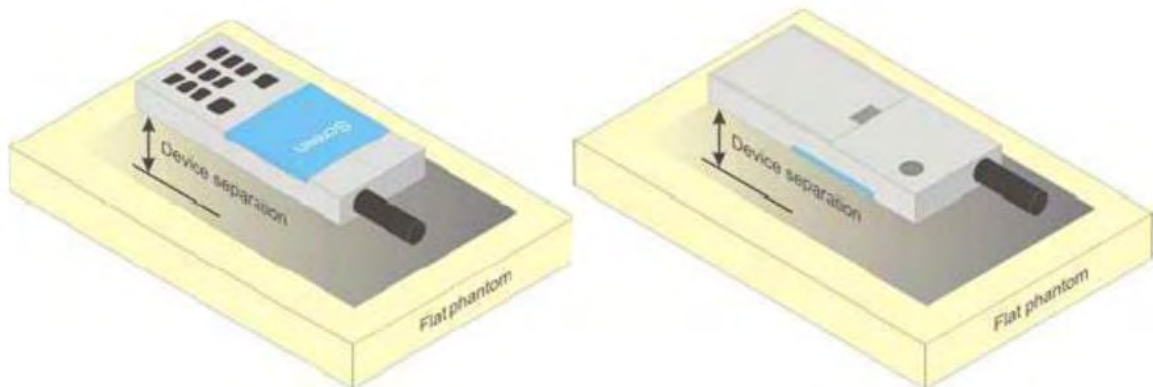
Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. The following table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion.

Frequency (MHz)	Power	Measured SAR <sub>1g</sub> (W/Kg)	Normalize to 1 Watt	Drift (%)	1W Target	Difference Percentage (%)	Limit (%)	Liquid Temp	Date
					SAR <sub>1g</sub> (W/Kg)				
900	250 mW	2.713	10.852	1.02	11.39	-4.72	±10	23.0	08/18/2023
2450	250 mW	13.552	54.208	-1.68	55.16	-1.73	±10	23.4	08/10/2023

## 12. EUT Testing Position

### Body-worn Position

A typical example of a body-worn device is a Mobile Phone , wireless enabled PDA or other battery operated wireless device with the ability to transmit while mounted on a person's body using a carry accessory approved by the wireless device manufacturer.



Test positions for body-worn devices

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## 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 mm $\pm$ 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm $\pm$ 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° $\pm$ 1°	20° $\pm$ 1°
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$			$\leq 2$ GHz: $\leq 15$ mm 2 – 3 GHz: $\leq 12$ mm	3 – 4 GHz: $\leq 12$ mm 4 – 6 GHz: $\leq 10$ mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ 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: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$			$\leq 2$ GHz: $\leq 8$ mm 2 – 3 GHz: $\leq 5$ mm*	3 – 4 GHz: $\leq 5$ mm* 4 – 6 GHz: $\leq 4$ mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		$\leq 5$ mm	3 – 4 GHz: $\leq 4$ mm 4 – 5 GHz: $\leq 3$ mm 5 – 6 GHz: $\leq 2$ mm
	graded grid	$\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4$ mm	3 – 4 GHz: $\leq 3$ mm 4 – 5 GHz: $\leq 2.5$ mm 5 – 6 GHz: $\leq 2$ mm
		$\Delta z_{Zoom}(n>1)$ : between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm	
Minimum zoom scan volume	x, y, z		$\geq 30$ mm	3 – 4 GHz: $\geq 28$ mm 4 – 5 GHz: $\geq 25$ mm 5 – 6 GHz: $\geq 22$ 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 <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB Publication 447498 is $\leq 1.4$ W/kg, $\leq 8$ mm, $\leq 7$ mm and $\leq 5$ 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

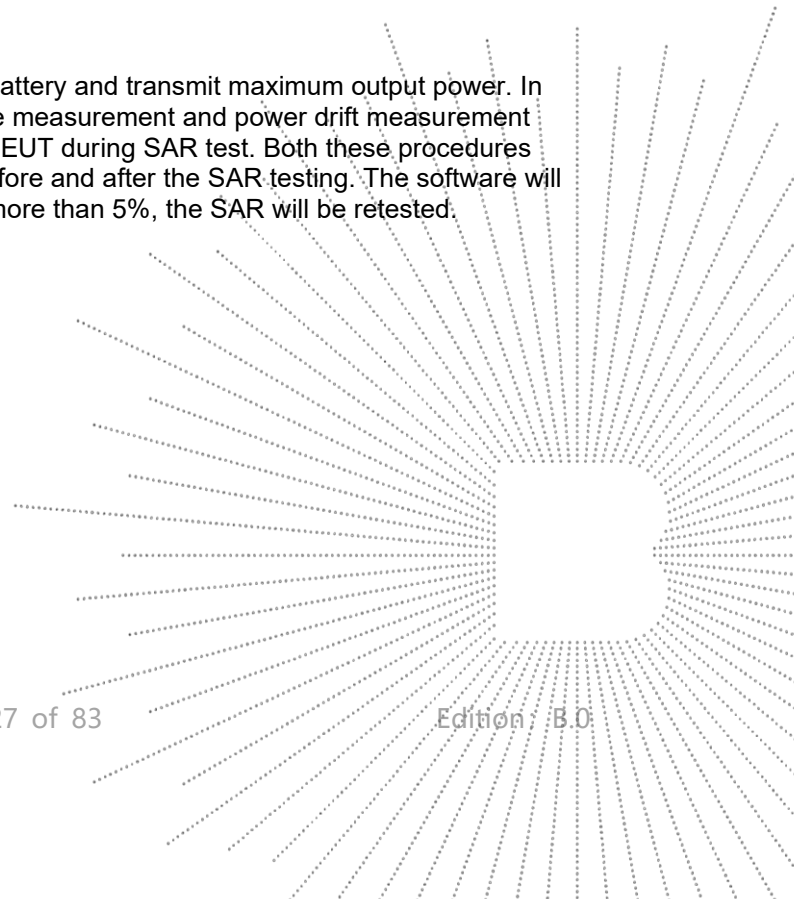
The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

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

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

The Tune-up limit already includes component tolerance. KDB 447498 sec.4.1.(d) at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.

RFID			
Modulation	Frequency (MHz)	Output Power (dBm)	Tune-up power (dBm)
ASK	902.8	23.45	24.0
	915.3	23.66	
	926.9	23.71	

Bluetooth-ANT A			
Modulation	Frequency (MHz)	Output Power (dBm)	Tune-up power (dBm)
1-DH1	2402	7.79	8.5
	2441	8.06	
	2480	8.12	
2-DH1	2402	6.22	7.5
	2441	6.92	
	2480	7.11	
3-DH1	2402	6.62	8.0
	2441	7.20	
	2480	7.38	

Bluetooth-ANT B			
Modulation	Frequency (MHz)	Output Power (dBm)	Tune-up power (dBm)
1-DH1	2402	-3.65	-3.0
	2441	-5.34	
	2480	-7.60	
2-DH1	2402	-2.11	-1.5
	2441	-3.45	
	2480	-5.71	
3-DH1	2402	-1.78	-1.0
	2441	-2.94	
	2480	-4.74	

**Note:**

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

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot \sqrt{f(\text{GHz})}$$

$\leq 3.0$  for 1-g SAR and  $\leq 7.5$  for 10-g extremity SAR

f(GHz) is the RF channel transmit frequency in GHz

Power and distance are rounded to the nearest mW and mm before calculation

The result is rounded to one decimal place for comparison

Bluetooth ANT	Bluetooth Turn up Power (dBm)	Bluetooth Turn up Power (mW)	Separation Distance (mm)	Frequency (GHz)	Result	Exclusion Thresholds
B	-1.0	0.79	5	2.48	0.25	3.0

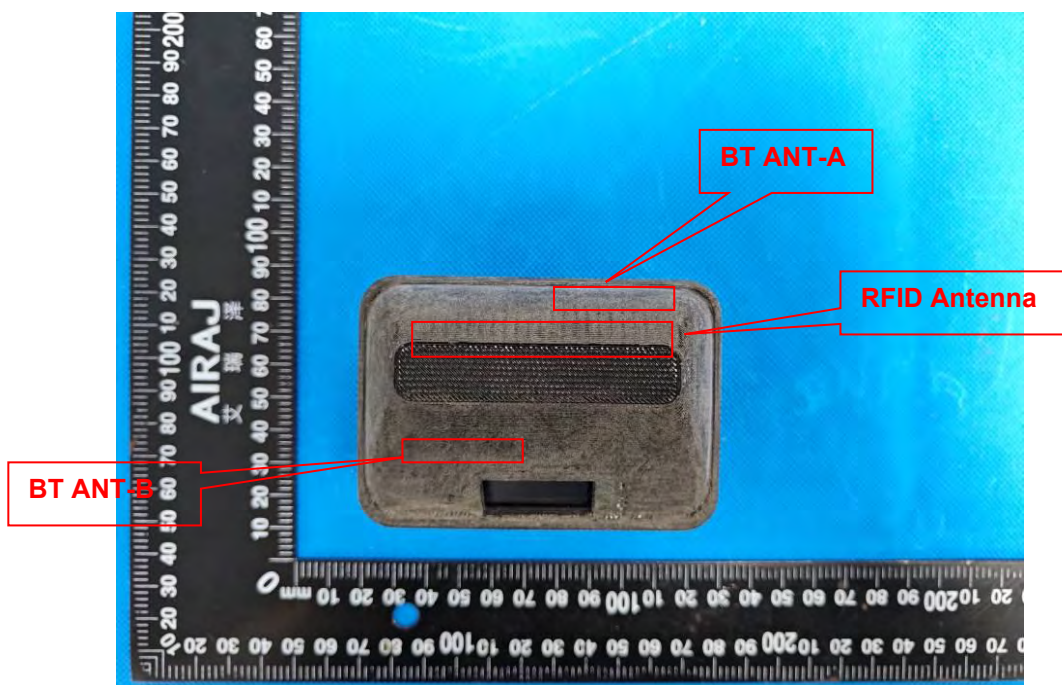
Per KDB 447498 D01v06, when the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion.

According to the calculation results in the table above, Bluetooth ANT-B SAR does not need to be tested.



## 14.2 Transmit Antennas and SAR Measurement Position

### EUT Antenna Location:



**Front View**

Antenna information	
Antenna	Function
RFID	TX/RX
BT ANT A	TX/RX
BT ANT B	TX/RX

Body mode: Positions for SAR tests; Test distance: 0mm		
Frequency Bands	Front	Back
RFID	Yes	Yes
Bluetooth	Yes	Yes

#### Note:

1. KDB 447498 D01 v06, Devices that are designed to operate on the body of users using lanyards and straps or without requiring additional body-worn accessories must be tested for SAR compliance using a conservative minimum test separation distance  $\leq 5$  mm to support compliance.

### 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

#### KDB 447498 D01 General RF Exposure Guidance:

Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

- $\leq 0.8$  W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
- $\leq 0.6$  W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- $\leq 0.4$  W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz

RFID											
RF Exposure Conditions	Dist. (mm)	Mode	Test Position	CH.	Freq. (MHz)	Output Power (dBm)	Turn up (dBm)	Turn-up Scaling Factor	SAR1g (W/kg)		Plot No.
									Meas.	Scaled	
Body-worn	0	RFID	Front	1	902.8	23.45	24.0	1.135	1.152	<b>1.308</b>	1
		RFID	Front	26	915.3	23.66	24.0	1.081	1.207	1.305	
		RFID	Front	50	926.9	23.71	24.0	1.069	1.202	1.285	
		RFID	Back	50	926.9	23.71	24.0	1.069	0.283	0.303	

Bluetooth											
RF Exposure Conditions	Dist. (mm)	Mode	Test Position	CH.	Freq. (MHz)	Output Power (dBm)	Turn up (dBm)	Turn-up Scaling Factor	SAR1g (W/kg)		Plot No.
									Meas.	Scaled	
Body-worn	0	GFSK	Front	78	2480	8.12	8.5	1.091	0.210	<b>0.229</b>	2
		GFSK	Back	78	2480	8.12	8.5	1.091	0.034	0.037	

Remark:

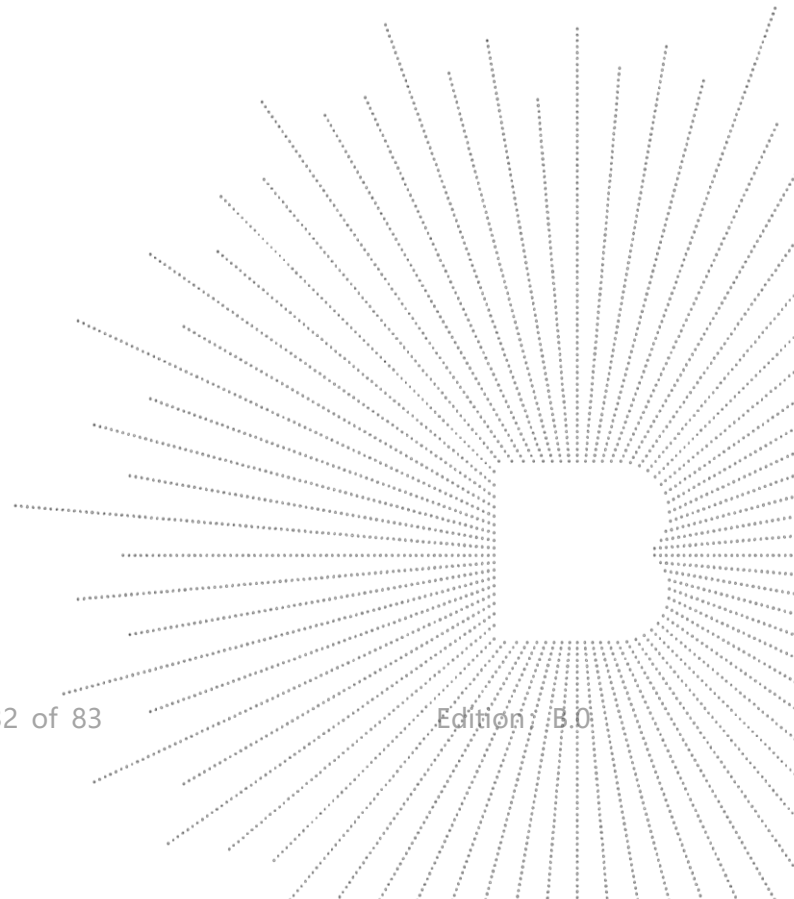
1. The value with the bold is the maximum SAR Value of each test band.
2. Per FCC KDB Publication 447498 D01, if the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is  $\leq 0.8$  W/kg then testing at the other channels SAR tests are not necessary.

## 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  $> 1.20$ .

Frequency Band (MHz)	Test Mode	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
RFID	915.3	Body-worn	Front	yes	1.207	1.167	1.034





## 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	RFID + Bluetooth ANT A	Yes
2	RFID + Bluetooth ANT B	Yes

### Remark:

- Bluetooth ANT A and Bluetooth ANT B cannot transmit simultaneously.
- 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:

- $(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \cdot [\sqrt{f(\text{GHz})/x}] \text{ W/kg}$  for test separation distances  $\leq 50 \text{ mm}$ ;  
where  $x = 7.5$  for 1-g SAR, and  $x = 18.75$  for 10-g SAR.
- $0.4 \text{ W/kg}$  for 1-g SAR and  $1.0 \text{ W/kg}$  for 10-g SAR, when the test separation distances is  $> 50 \text{ mm}$

Estimated stand alone SAR						
Communication system	Frequency (MHz)	Maximum Power (dBm)	Maximum Power (mW)	Separation Distance (mm)	X	Estimated SAR1-g (W/kg)
Bluetooth*-ANT B	2480	-1.0	0.79	5	7.5	0.033

Note:

- Bluetooth\*- Including Lower power Bluetooth
- Maximum average power including tune-up tolerance;
- When the minimum test separation distance is  $< 5 \text{ mm}$ , a distance of  $5 \text{ mm}$  is applied to determine SAR test exclusion

- 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  $\leq 1.6 \text{ W/Kg}$ . When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

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

- Simultaneous transmission of maximum SAR sum calculation.

RF Exposure Conditions	Test Position	Standalone SAR (W/kg)			Summed SAR W/kg	
		1	2	3	1+2	1+3
		RFID	BT-ANT A	BT-ANT B		
Body	Back	0.303	0.037	0.033	0.340	0.336
	Front	1.308	0.229	0.033	1.537	1.341

## 15. Test Plots

### 15.1 System Performance Check

#### System check at 900 MHz

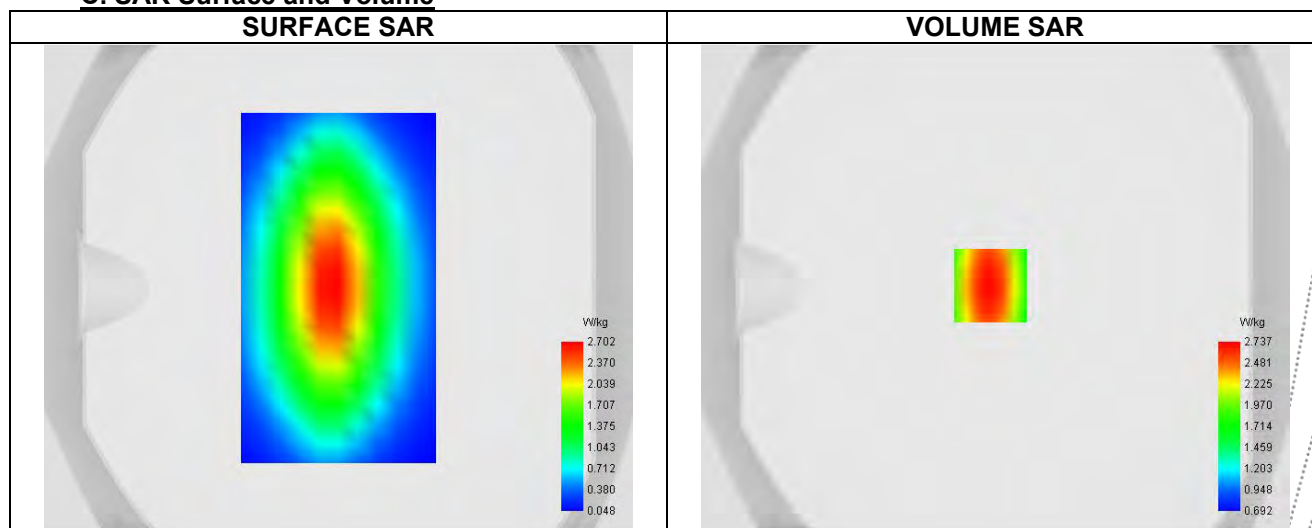
##### A. Experimental conditions.

Probe	SN 26/23 EPG0420
ConvF	0.76
Area Scan	surf_sam_plan.txt
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW900
Channels	Middle
Signal	CW (Crest factor: 1.0)

##### B. Permittivity

Frequency (MHz)	900.000
Relative permittivity (real part)	41.022
Relative permittivity (imaginary part)	20.182
Conductivity (S/m)	0.947

##### C. SAR Surface and Volume



Maximum location: X=-2.00, Y=1.00 ; SAR Peak: 5.86 W/kg

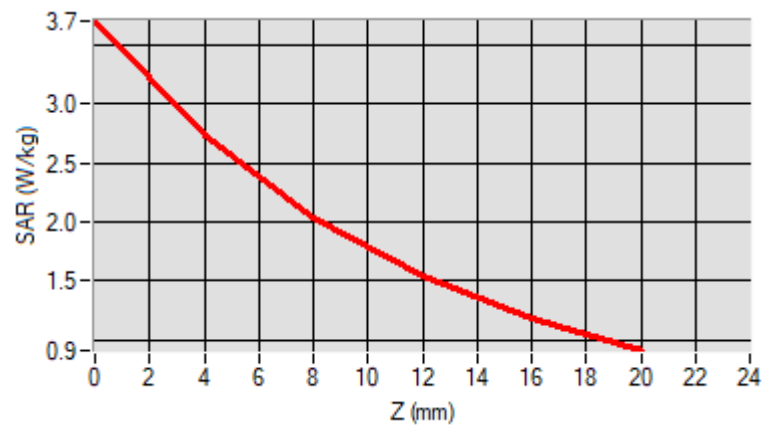
##### D. SAR 1g & 10g

SAR 10g (W/Kg)	1.705
SAR 1g (W/Kg)	2.713
Variation (%)	1.020
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

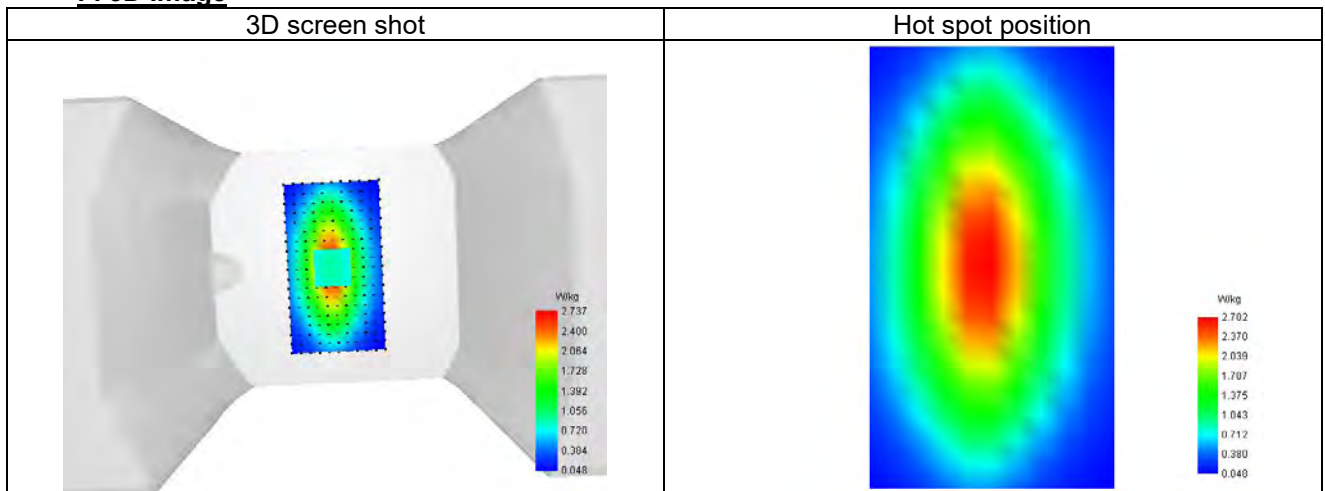
##### E. Z Axis Scan

Z (mm)	0.00	4.00	8.00	12.00	16.00
--------	------	------	------	-------	-------

SAR (W/Kg)	3.695	2.824	2.174	1.628	1.223
------------	-------	-------	-------	-------	-------



### F. 3D Image



## System check at 2450 MHz

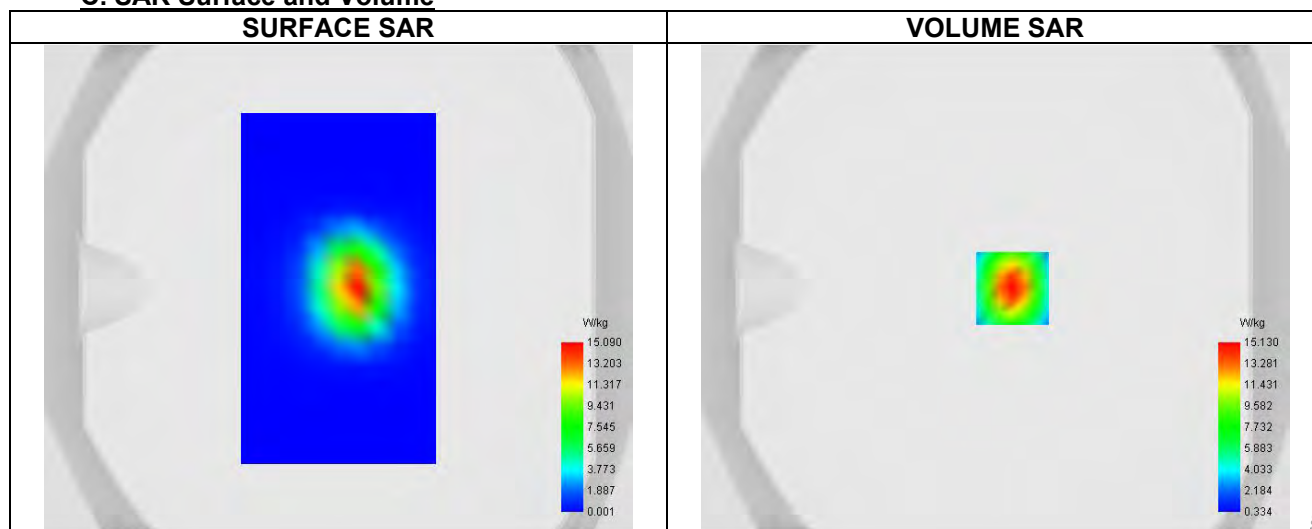
### A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	1.11
Area Scan	surf_sam_plan.txt
Zoom Scan	7x7x8,dx=5mm dy=5mm dz=4mm
Phantom	Validation plane
Device Position	Dipole
Band	CW2450
Channels	Middle
Signal	CW (Crest factor: 1.0)

### B. Permittivity

Frequency (MHz)	2450.000
Relative permittivity (real part)	38.681
Relative permittivity (imaginary part)	13.207
Conductivity (S/m)	1.753

### C. SAR Surface and Volume



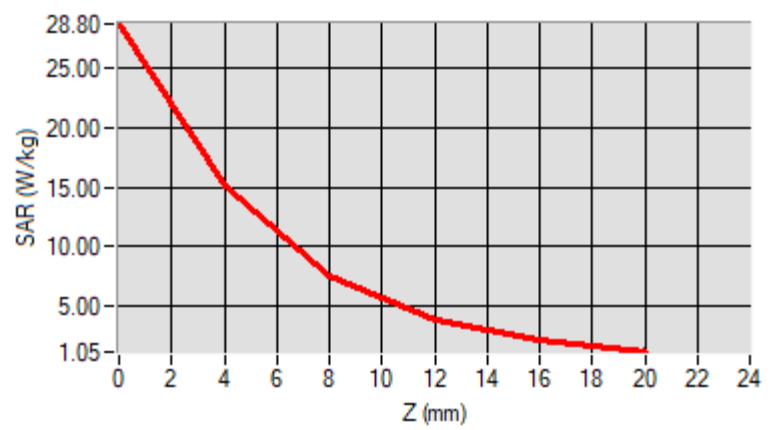
Maximum location: X=7.00, Y=0.00 ; SAR Peak: 29.58 W/kg

### D. SAR 1g & 10g

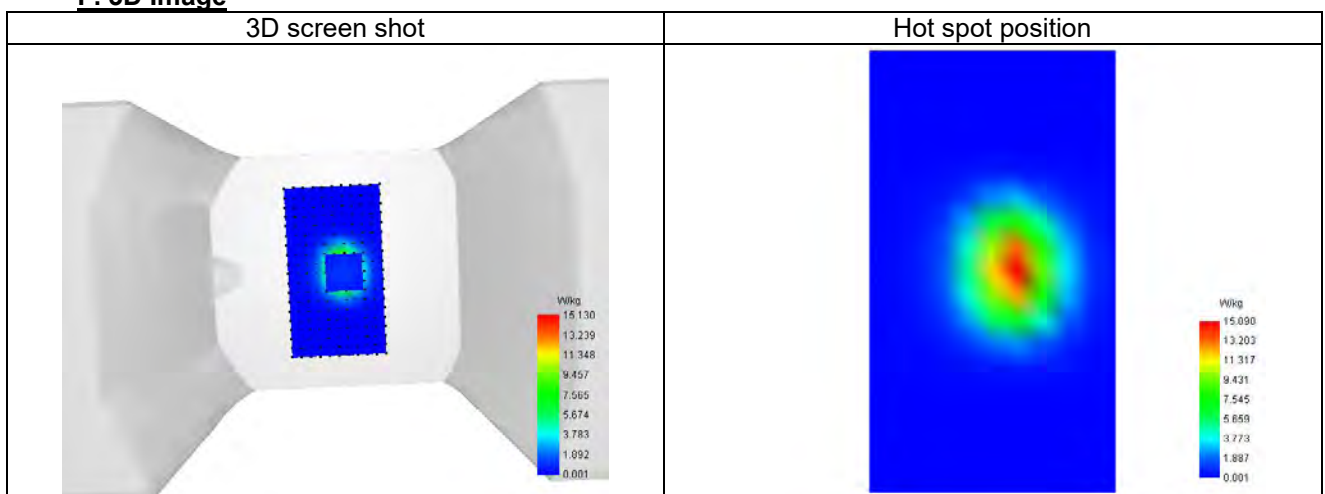
SAR 10g (W/Kg)	6.084
SAR 1g (W/Kg)	13.552
Variation (%)	-1.680
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

### E. Z Axis Scan

Z (mm)	0.00	4.00	8.00	12.00	16.00
SAR (W/Kg)	28.768	15.102	7.383	3.476	1.812



### F. 3D Image





## 15.2 SAR Test Graph Results

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

### Plot 1

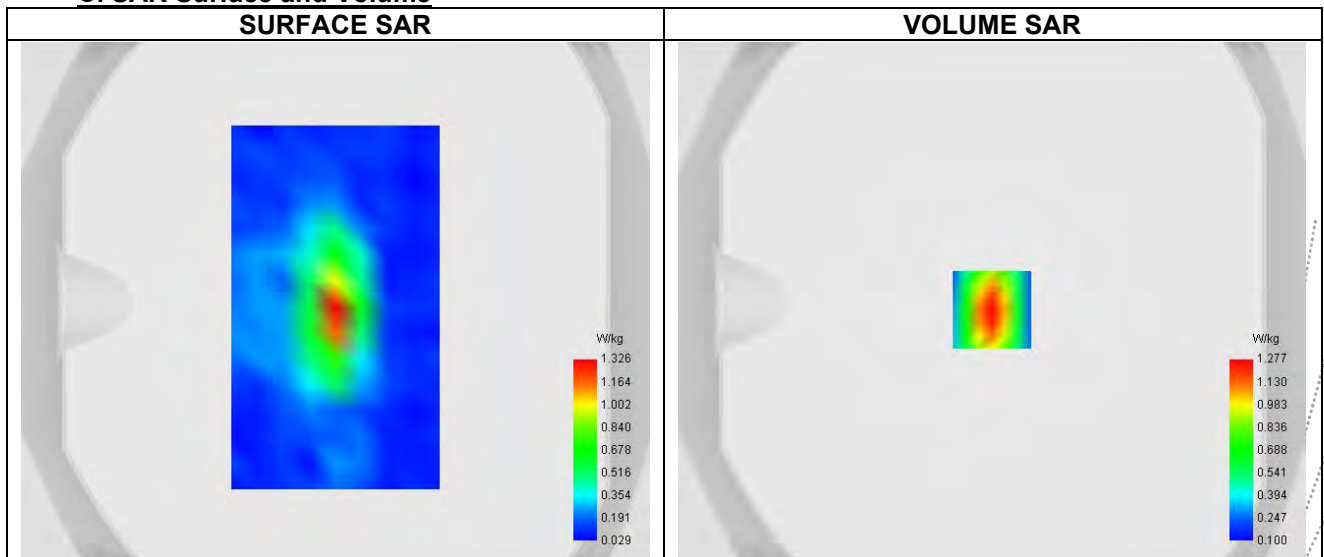
#### A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	0.76
Area Scan	surf_sam_plan.txt
Zoom Scan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Body
Band	RFID
Channels	Lower (1)
Signal	Custom (Crest factor: 1.0)

#### B. Permittivity

Frequency (MHz)	902.800
Relative permittivity (real part)	40.946
Relative permittivity (imaginary part)	19.380
Conductivity (S/m)	0.952

#### C. SAR Surface and Volume



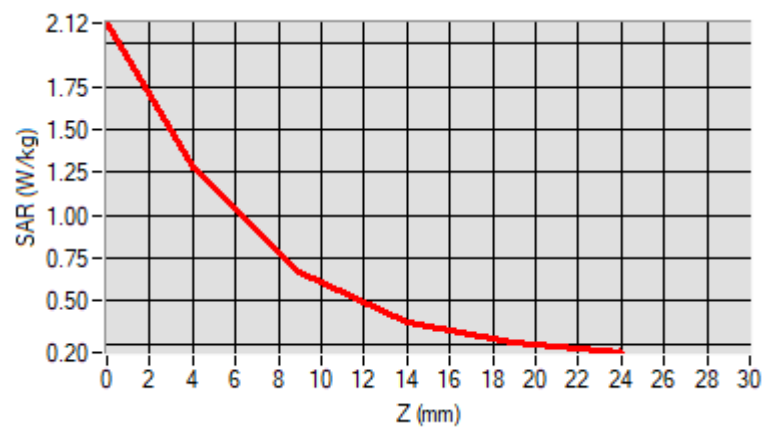
Maximum location: X=0.00, Y=-3.00 ; SAR Peak: 2.12 W/kg

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

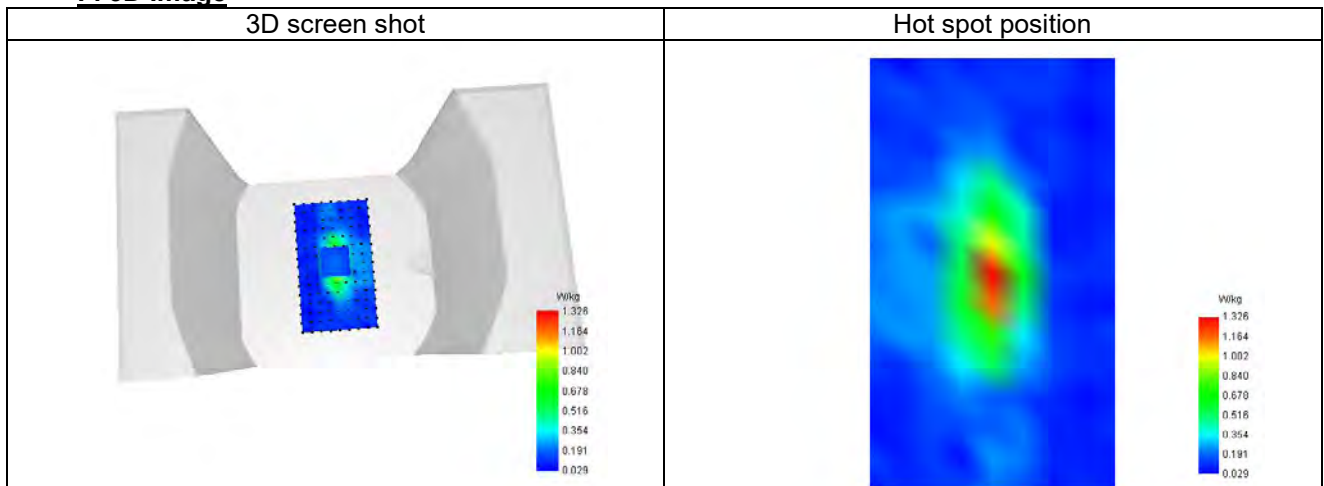
SAR 10g (W/Kg)	0.606
SAR 1g (W/Kg)	1.152
Variation (%)	4.270
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

### E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.120	1.277	0.669	0.379	0.258



### F. 3D Image



## Plot 2

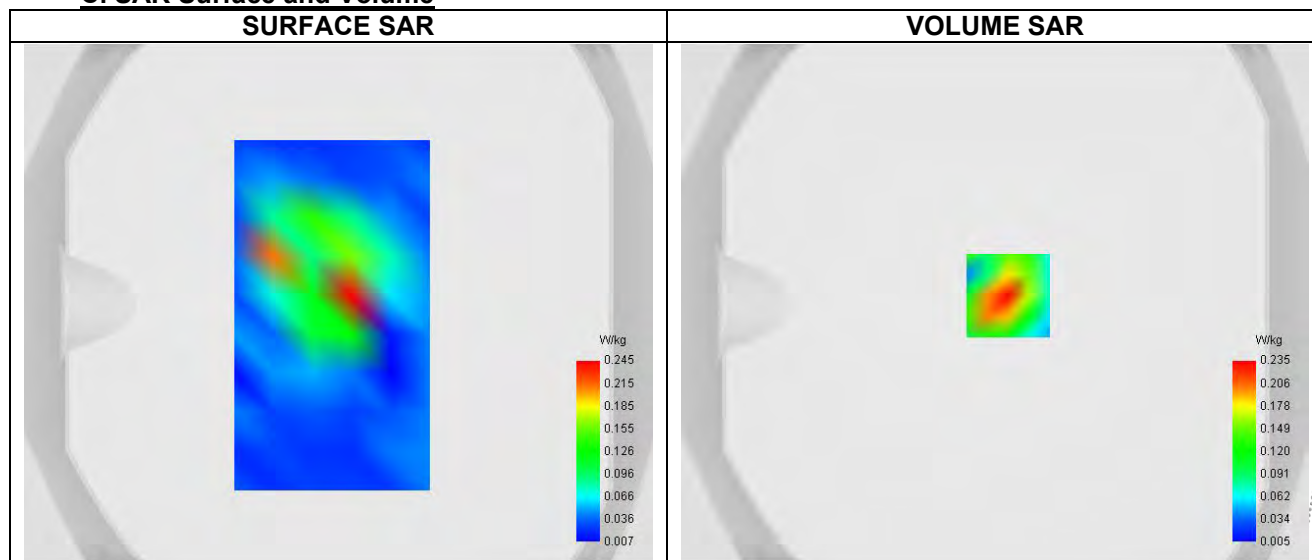
### A. Experimental conditions.

Probe	SN 26/23 EPG0420
ConvF	1.11
Area Scan	surf_sam_plan.txt
Zoom Scan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Body
Band	Bluetooth
Channels	Higher (78)
Signal	Bluetooth (Crest factor: 1.0)

### B. Permittivity

Frequency (MHz)	2480.000
Relative permittivity (real part)	38.624
Relative permittivity (imaginary part)	13.211
Conductivity (S/m)	1.771

### C. SAR Surface and Volume



Maximum location: X=5.00, Y=3.00 ; SAR Peak: 0.35 W/kg

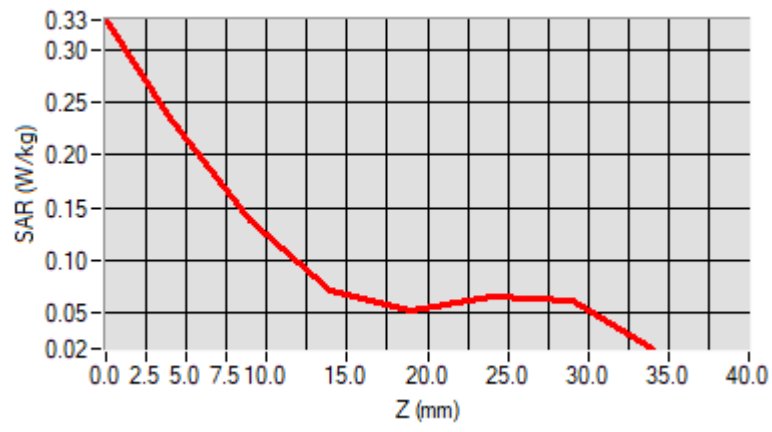
### D. SAR 1g & 10g

SAR 10g (W/Kg)	0.108
SAR 1g (W/Kg)	0.210
Variation (%)	-3.620
Horizontal validation criteria: minimum distance (mm)	0.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	0.000000

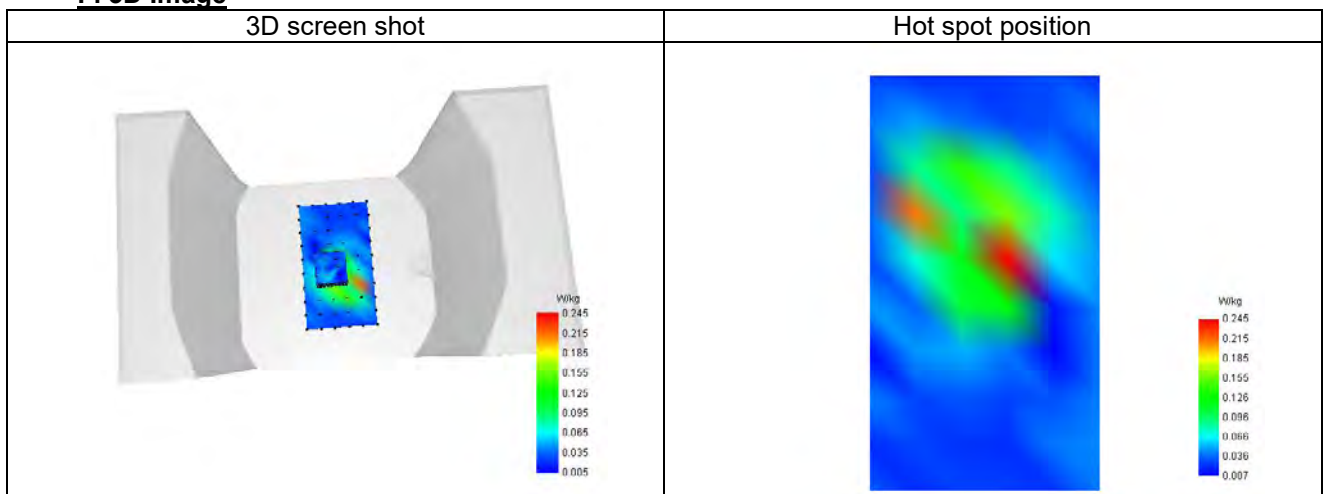
### E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.328	0.235	0.138	0.072	0.051	0.066	0.061





### F. 3D Image



## 16. CALIBRATION CERTIFICATES

Probe-EPGO420 Calibration Certificate  
SID 900Dipole Calibration Certificate  
SID2450Dipole Calibration Certificate

CO., LTD.

**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: 7/18/2023**

Accreditations #2-6789  
Scope available on [www.cofrac.fr](http://www.cofrac.fr)

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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


**COMOSAR E-FIELD PROBE CALIBRATION REPORT**

Ref: ACR 199.1.23 BES A

	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Cyrille ONNEE	Measurement Responsible	7/18/2023	
<i>Checked &amp; approved by:</i>	Jérôme Luc	Technical Manager	7/18/2023	
<i>Authorized by:</i>	Yann Toutain	Laboratory Director	7/18/2023	

Yann  
Toutain ID

Signature numérique  
de Yann Toutain ID  
Date : 2023.07.18  
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	7/18/2023	Initial release

Page: 2/11

Template ACR.DDD.N.YT.MVGRJSUE COMOSAR Probe vL

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## TABLE OF CONTENTS

1	Device Under Test .....	4
2	Product Description .....	4
2.1	General Information .....	4
3	Measurement Method .....	4
3.1	Sensitivity .....	4
3.2	Linearity .....	5
3.3	Isotropy .....	5
3.4	Boundary Effect .....	5
4	Measurement Uncertainty .....	6
5	Calibration Results .....	6
5.1	Calibration in air .....	6
5.2	Calibration in liquid .....	7
6	Verification Results .....	9
7	List of Equipment .....	10





## 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.





### 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:

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

where

$SAR_{uncertainty}$	is the uncertainty in percent of the probe boundary effect
$d_{be}$	is the distance between the surface and the closest <i>zoom-scan</i> measurement point, in millimetre
$\Delta_{step}$	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;
$\Delta SAR_{be}$	in percent of SAR is the deviation between the measured SAR value, at the distance $d_{be}$ from the boundary, and the analytical SAR value.

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



#### 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.

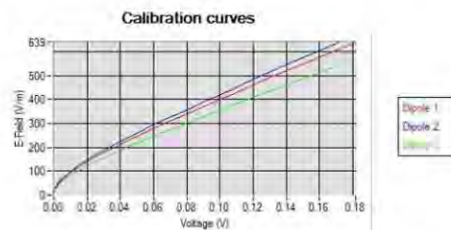
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

#### 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

Vi=voltage readings on the 3 channels of the probe

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

Normi=dipole sensitivity given below for the 3 channels of the probe

Page: 6/11

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Ref: ACR 199.1.23 BES A

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

$P_W$ =the power delivered to the liquid

Page: 7/11

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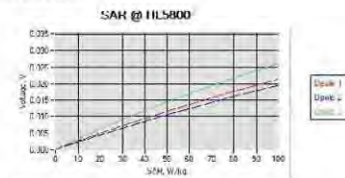

**COMOSAR E-FIELD PROBE CALIBRATION REPORT**

Ref: ACR 199.1.23.BES.A

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  $\pm 50$  MHz below 600 MHz,  $\pm 100$  MHz from 600 MHz to 6 GHz and  $\pm 700$  MHz above 6 GHz



Page: 8/11

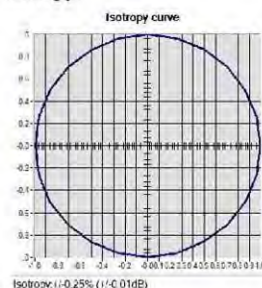
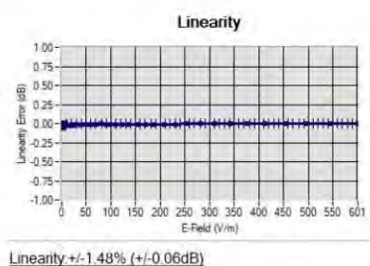
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## 6 VERIFICATION RESULTS

The figures below represent the measured linearity and axial isotropy for this probe. The probe specification is  $\pm 0.2$  dB for linearity and  $\pm 0.15$  dB for axial isotropy.





## 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	08/2021	08/2024
Network Analyzer	Agilent 8753ES	MY40003210	10/2019	10/2023
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	06/2021	06/2024
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_1	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_1	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_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.

Page: 10/11

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Ref: ACR 199.1.23 BES A

Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG14_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_7G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2021	06/2024

Page: 11/11

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## SAR Reference Dipole Calibration Report

Ref : ACR.329.10.21.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 REFERENCE DIPOLE**

**FREQUENCY: 900 MHZ**

**SERIAL NO.: SN 47/21 DIP 0G900-622**

**Calibrated at MVG**

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

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

**Calibration date: 11/25/2021**



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#### *Summary:*

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.

Page: 1/13


**SAR REFERENCE DIPOLE CALIBRATION REPORT**

Ref: ACR.329.10.21.BES.A

	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Jérôme Le Gall	Measurement Responsible	11/25/2021	
<i>Checked by :</i>	Jérôme Luc	Technical Manager	11/25/2021	
<i>Approved by :</i>	Yann Toutain	Laboratory Director	11/25/2021	

2021.11.25

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	<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	Jérôme Luc	11/25/2021	Initial release

Page: 2/13

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## TABLE OF CONTENTS

1	Introduction.....	4
2	Device Under Test .....	4
3	Product Description .....	4
3.1	General Information .....	4
4	Measurement Method .....	5
4.1	Return Loss Requirements .....	5
4.2	Mechanical Requirements .....	5
5	Measurement Uncertainty .....	5
5.1	Return Loss .....	5
5.2	Dimension Measurement .....	5
5.3	Validation Measurement .....	5
6	Calibration Measurement Results .....	6
6.1	Return Loss and Impedance In Head Liquid .....	6
6.2	Return Loss and Impedance In Body Liquid .....	6
6.3	Mechanical Dimensions .....	7
7	Validation measurement .....	7
7.1	Head Liquid Measurement .....	8
7.2	SAR Measurement Result With Head Liquid .....	8
7.3	Body Liquid Measurement .....	11
7.4	SAR Measurement Result With Body Liquid .....	12
8	List of Equipment .....	13





## 1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

## 2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID900
Serial Number	SN 47/21 DIP 0G900-622
Product Condition (new / used)	New

## 3 PRODUCT DESCRIPTION

### 3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only.



**Figure 1 – MVG COMOSAR Validation Dipole**

Page: 4/13

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#### 4 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

##### 4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

##### 4.2 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness. A direct method is used with a ISO17025 calibrated caliper.

#### 5 MEASUREMENT UNCERTAINTY

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

##### 5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.08 LIN

##### 5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
0 - 300	0.20 mm
300 - 450	0.44 mm

##### 5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.



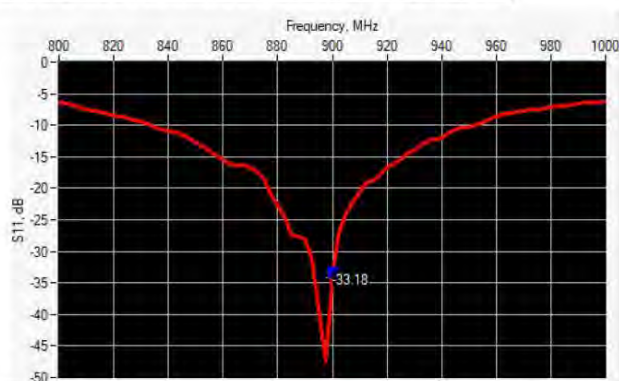

**SAR REFERENCE DIPOLE CALIBRATION REPORT**

Ref: ACR.329.10.21.BES.A

Scan Volume	Expanded Uncertainty
1 g	19 % (SAR)
10 g	19 % (SAR)

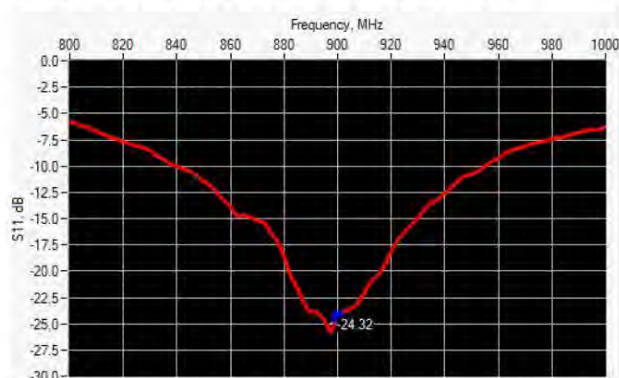
## 6 CALIBRATION MEASUREMENT RESULTS

### 6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
900	-33.18	-20	$52.1 \Omega + 0.7 j\Omega$

### 6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
900	-24.32	-20	$52.6 \Omega + 5.5 j\Omega$

Page: 6/13

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### 6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	420.0 $\pm 1$ %		250.0 $\pm 1$ %		6.35 $\pm 1$ %	
450	290.0 $\pm 1$ %		166.7 $\pm 1$ %		6.35 $\pm 1$ %	
750	176.0 $\pm 1$ %		100.0 $\pm 1$ %		6.35 $\pm 1$ %	
835	161.0 $\pm 1$ %		89.8 $\pm 1$ %		3.6 $\pm 1$ %	
900	149.0 $\pm 1$ %	149.49	83.3 $\pm 1$ %	83.01	3.6 $\pm 1$ %	3.59
1450	89.1 $\pm 1$ %		51.7 $\pm 1$ %		3.6 $\pm 1$ %	
1500	86.2 $\pm 1$ %		50.0 $\pm 1$ %		3.6 $\pm 1$ %	
1640	79.0 $\pm 1$ %		45.7 $\pm 1$ %		3.6 $\pm 1$ %	
1750	75.2 $\pm 1$ %		42.9 $\pm 1$ %		3.6 $\pm 1$ %	
1800	72.0 $\pm 1$ %		41.7 $\pm 1$ %		3.6 $\pm 1$ %	
1900	68.0 $\pm 1$ %		39.5 $\pm 1$ %		3.6 $\pm 1$ %	
1950	66.3 $\pm 1$ %		38.5 $\pm 1$ %		3.6 $\pm 1$ %	
2000	64.5 $\pm 1$ %		37.5 $\pm 1$ %		3.6 $\pm 1$ %	
2100	61.0 $\pm 1$ %		35.7 $\pm 1$ %		3.6 $\pm 1$ %	
2300	55.5 $\pm 1$ %		32.6 $\pm 1$ %		3.6 $\pm 1$ %	
2450	51.5 $\pm 1$ %		30.4 $\pm 1$ %		3.6 $\pm 1$ %	
2600	48.5 $\pm 1$ %		28.8 $\pm 1$ %		3.6 $\pm 1$ %	
3000	41.5 $\pm 1$ %		25.0 $\pm 1$ %		3.6 $\pm 1$ %	
3300	-		-		-	
3500	37.0 $\pm 1$ %		26.4 $\pm 1$ %		3.6 $\pm 1$ %	
3700	34.7 $\pm 1$ %		26.4 $\pm 1$ %		3.6 $\pm 1$ %	
3900	-		-		-	
4200	-		-		-	
4600	-		-		-	
4900	-		-		-	

### 7 VALIDATION MEASUREMENT

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

Page: 7/13

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