FCC SAR TEST REPORT

Application No:	ZR/2021/20037
Applicant:	Wise Ally Holding Limited
Manufacturer:	Wise Ally Holding Limited
Product Name:	Rapid Response Button
Model No.(EUT):	AP82
Trade Mark:	Wise Ally Holding Limited
FCC ID:	2AGEG-AP82
Standards:	FCC 47CFR §2.1093
Date of Receipt:	2021-02-22
Date of Test:	2021-03-11 to 2021-03-11
Date of Issue:	2021-03-19
Test Result:	**PASS ***

* In the configuration tested, the EUT detailed in this report complied with the standards specified above.

Authorized Signature:

Derek Yang

Wireless Laboratory Manager

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REVISION HISTORY

Revision Record				
Version	**Chapter**	**Date**	**Modifier**	**Remark**
01		2021-03-19		Original

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TEST SUMMARY

Frequency Band	Test position	Max Report SAR1-g (W/kg)	SAR limit (W/kg)	Verdict
WiFi 2.4G	Body	1.15	1.6	PASS
Bluetooth	Body	/	1.6	PASS
Lora	Body	**1.34**	1.6	PASS

Reviewed by

Jackson Li

Prepared by

Roman Pan

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1 General Information

1.1 Details of Client

Applicant:	Wise Ally Holdings Limited
Address:	Unit 3203-3207, Tower 1, Enterprise Square Five, 38 Wang Chiu Road, Kowloon Bay, Hong Kong
Manufacturer:	Wise Ally Holdings Limited
Address:	Unit 3203-3207, Tower 1, Enterprise Square Five, 38 Wang Chiu Road, Kowloon Bay, Hong Kong

1.2 Test Location

Company:	SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch E&E Lab
Address:	No. 1 Workshop, M-10, Middle section, Science & Technology Park, Shenzhen, Guangdong, China
Post code:	518057
Telephone:	+86 (0) 755 2601 2053
Fax:	+86 (0) 755 2671 0594
E-mail:	ee.shenzhen@sgs.com

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1.3 Test Facility

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

• CNAS (No. CNAS L2929)

CNAS has accredited SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch EMC Lab to ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories (CNAS-CL01 Accreditation Criteria for the Competence of Testing and Calibration Laboratories) for the competence in the field of testing.

• A2LA (Certificate No. 3816.01)

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

• VCCI

The 10m Semi-anechoic chamber and Shielded Room of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-823, R-4188, T-1153 and C-2383 respectively.

• FCC –Designation Number: CN1178

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1178. Test Firm Registration Number: 406779.

• Industry Canada (IC)

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006

IC#: 4620C.

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1.4 General Description of EUT

Product Name:	Rapid Response Button		
Model No.(EUT):	AP82		
Trade Mark:	Wise Ally Holdings Limited		
Product Phase:	production unit		
Device Type:	portable device		
Exposure Category:	uncontrolled environment / general population		
SN:	C1		
FCC ID:	2AGEG-AP82		
Hardware Version:	4.2		
Software Version:	1.0.8		
Antenna Type:	Lora: Monopole Antenna Bluetooth/2.4 GHz Wi-Fi: PIFA Antenna		
Device Operating Configurations:			
Modulation Mode:	**Lora**: DBPSK **WIFI:** DSSS, OFDM **Bluetooth:** GFSK		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
	Lora (125 kHz)	902.3~914.9	923.3~927.5
	Lora (500 kHz)	903.0~914.2	923.3~927.5
	Bluetooth	2402~2480	2402~2480
	Wi-Fi 2.4G	2412~2462	2412~2462
Battery Information:	Model No.:	SD803041	
	Normal Voltage:	3.7V	
	Rated capacity:	1000mAh	
	Manufacturer:	Shida Battery Technology Co. Ltd	

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1.5 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE Std C95.1 – 1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 447498 D01 v06	General RF Exposure Guidance
KDB 248227 D01	SAR Guidance for IEEE 802 11 Wi-Fi SAR v02r02
KDB 941225 D06	Hotspot Mode SAR v02r01
KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
KDB 865664 D02 v01r02	RF Exposure Reporting

1.6 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	**1.60 W/Kg**	8.00 W/Kg
Spatial Average SAR** (Whole Body)	0.08 W/Kg	0.40 W/Kg
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 W/Kg	20.00 W/Kg

Notes:

* The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time

** The Spatial Average value of the SAR averaged over the whole body.

*** The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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

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

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2 SAR Measurements System Configuration

2.1 The SAR Measurement System

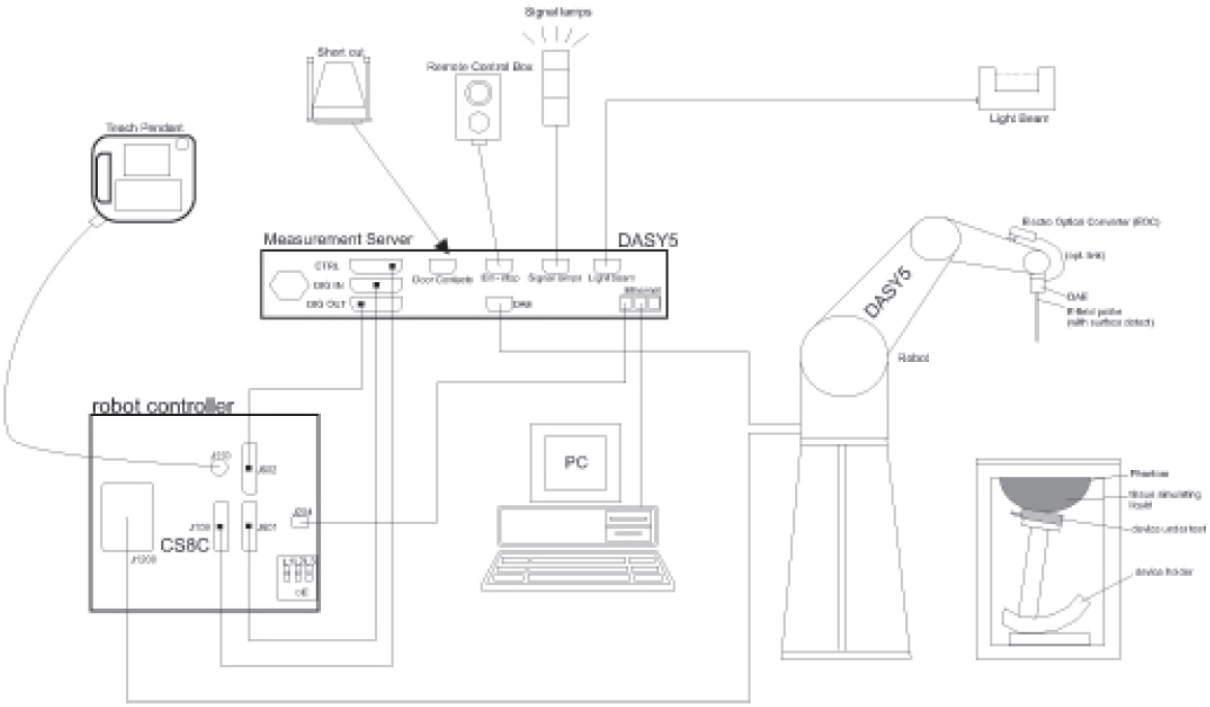
This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

The DASY5 system for performing compliance tests consists of the following items:
A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software .An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.



F-1. SAR Measurement System Configuration

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- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7.
- DASY5 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

2.2 Isotropic E-field Probe EX3DV4

	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 µW/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

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2.3 Data Acquisition Electronics (DAE)

Model	DAE	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)	
Input Offset Voltage	< 5µV (with auto zero)	
Input Bias Current	< 50 f A	
Dimensions	60 x 60 x 68 mm	

2.4 SAM Twin Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	
Wooden Support	SPEAG standard phantom table	

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

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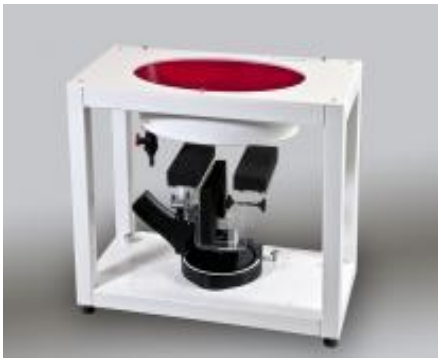
2.5 ELI Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	
Wooden Support	SPEAG standard phantom table	

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.

ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure.

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2.6 Device Holder for Transmitters

F-2. **Device Holder for Transmitters**

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity ε=3 and loss tangent δ=0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

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2.7 Measurement procedure

2.7.1 Scanning procedure

Step 1: Power reference measurement

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: *Area scan*

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm.Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: *Zoom scan*

Around this point, a volume of 30mm*30mm*30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5x5x7 points (≤2GHz) and 7x7x7 points (≥2GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification).The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

The area and zoom scan resolutions specified in the table below must be applied to the SAR measurements Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.

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			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	≤ 1.5·$\Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details. * When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 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.				

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max. ± 5 %

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2.7.2 Data Storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “DAE”. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated. The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [m W/g], [m W/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

2.7.3 Data Evaluation by SEMCAD

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

Probe parameters:	- Sensitivity	Normi, ai0, ai1, ai2
	- Conversion factor	ConvFi
	- Diode compression point	Dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	ε
	- Density	ρ

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

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

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

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

cf = crest factor of exciting field (DASY parameter)

dcp i = diode compression point (DASY parameter)

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

E-field probes:

$$E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$$

H-field probes:

$$H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1} f + a_{i2} f^2) / f$$

With Vi = compensated signal of channel i (i = x, y, z)
Normi = sensor sensitivity of channel I (i = x, y, z)
[mV/(V/m)2] for E-field Probes
ConvF = sensitivity enhancement in solution
aij = sensor sensitivity factors for H-field probes
f = carrier frequency [GHz]
Ei = electric field strength of channel i in V/m

Hi = magnetic field strength of channel i in A/m

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

$$E_{tot} = (E_x^2 + E_Y^2 + E_z^2)^{1/2}$$

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

$$SAR = (Etot^2 \cdot \sigma) / (\varepsilon \cdot 1000)$$

with SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

σ= conductivity in [mho/m] or [Siemens/m]

ε= equivalent tissue density in g/cm3

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}^2{}_2 / 3770 \quad \text{or} \quad P_{pwe} = H_{tot}^2 \cdot 37.7$$

with Ppwe = equivalent power density of a plane wave in mW/cm2
Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m

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3 Description of Test Position

3.1 The Body Test Position

Some battery-operated handsets have the capability to transmit and receive user data through simultaneous transmission of WIFI simultaneously with a separate licensed transmitter. The FCC has provided guidance in FCC KDB Publication 941225 D06 where SAR test considerations for handsets (L x W ≥ 9 cm x 5 cm) are based on a composite test separation distance of 10 mm from the front, back and edges of the device containing transmitting antennas within 2.5 cm of their edges, determined from general mixed use conditions for this type of devices. For devices with form factors smaller than 9 cm x 5 cm, a test separation distance of ≤5 mm is required.

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4 SAR System Verification Procedure

4.1 Tissue Simulate Liquid

4.1.1 Recipes for Tissue Simulate Liquid

The bellowing tables give the recipes for tissue simulating liquids to be used in different frequency bands：

Ingredients (% by weight)	Frequency (MHz)				
	450	700-900	1800-2000	2300-2500	2500-2700
Water	38.56	40.30	55.24	55.00	54.92
Salt (NaCl)	3.95	1.38	0.31	0.2	0.23
Sucrose	56.32	57.90	0	0	0
HEC	0.98	0.24	0	0	0
Bactericide	0.19	0.18	0	0	0
Tween	0	0	44.45	44.80	44.85

Salt: 99^{+}% Pure Sodium Chloride

Sucrose: 98^{+}% Pure Sucrose

Water: De-ionized, 16 MΩ^{+} resistivity

HEC: Hydroxyethyl Cellulose

Tween: Polyoxyethylene (20) sorbitan monolaurate

HSL5GHz is composed of the following ingredients：

Water：50-65%

Mineral oil：10-30%

Emulsifiers：8-25%

Sodium salt：0-1.5%

Table 1： Recipe of Tissue Simulate Liquid

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4.1.2 Measurement for Tissue Simulate Liquid

The dielectric properties for this Tissue Simulate Liquids were measured by using the Agilent Model 85070E Dielectric Probe in conjunction with Agilent E5071C Network Analyzer (300 KHz-8500 MHz). The Conductivity (σ) and Permittivity (ρ) are listed in Table 2. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was 22±2°C.

Tissue Type	Measured Frequency (MHz)	Target Tissue (±5%)		Measured Tissue		Liquid Temp.	Measured Date
		ε_r	σ(S/m)	ε_r	σ(S/m)	(℃)	
835 Head	835	41.5 (39.43~43.58)	0.90 (0.86~0.95)	42.883	0.890	21.9	2021/3/11
2450 Head	2450	39.2 (37.24~41.16)	1.8 (1.71~1.89)	40.615	1.758	22.0	2021/3/11

Table 2： Measurement result of Tissue electric parameters

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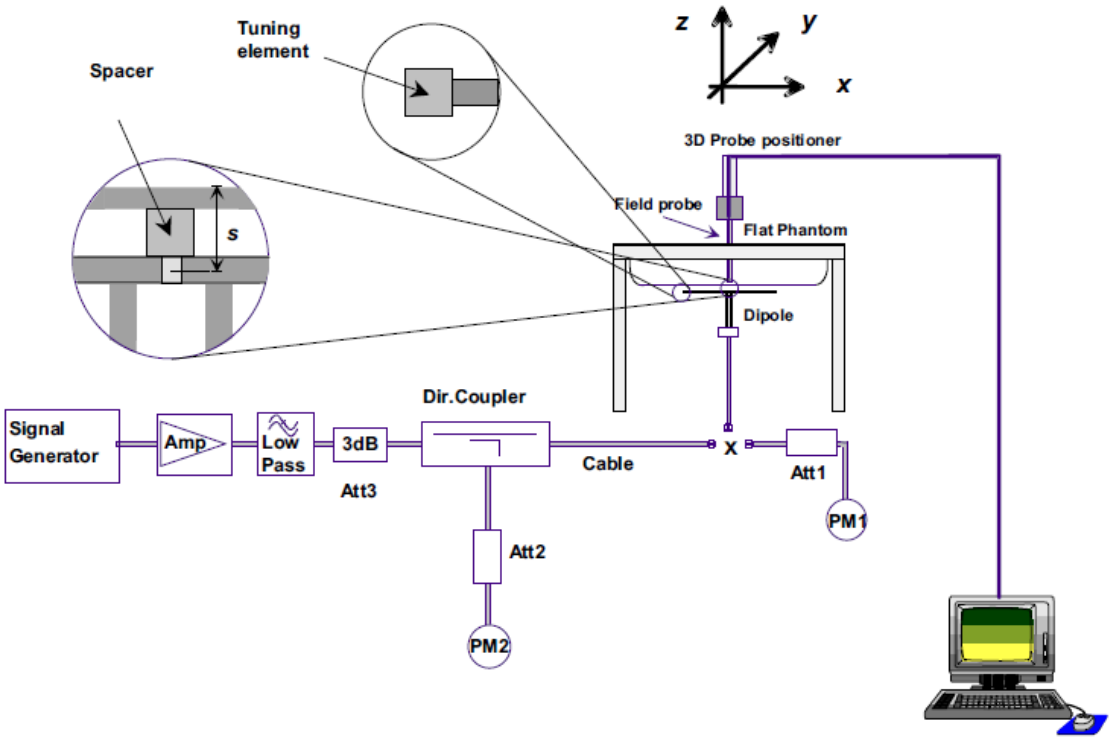
4.2 SAR System Check

The microwave circuit arrangement for system Check is sketched in F-3. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table (A power level of 250mW (below 3GHz) or 100mW (3-6GHz) was input to the dipole antenna). During the tests, the ambient temperature of the laboratory was in the range 22±2°C, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above 15±0.5 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



F-3. the microwave circuit arrangement used for SAR system check

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4.2.1 Justification for Extended SAR Dipole Calibrations

1) Referring to KDB865664 D01 requirements for dipole calibration, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
a) There is no physical damage on the dipole;
b) System check with specific dipole is within 10% of calibrated value;
c) Return-loss is within 10% of calibrated measurement;
d) Impedance is within 5Ω from the previous measurement.

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

4.2.2 Summary System Check Result(s)

Validation Kit		Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1W)	Measured SAR (normalized to 1W)	Target SAR (normalized to 1W) (±10%)	Target SAR (normalized to 1W) (±10%)	Liquid Temp. (℃)	Measured Date
		1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)		
D835V2	Head	2.49	1.63	9.96	6.52	9.64 (8.68~10.60)	6.29 (5.66~6.92)	21.9	2021/3/11
D2450V2	Head	12.20	5.69	48.80	22.76	51.9 (46.71~57.09)	23.8 (21.42~26.18)	22.0	2021/3/11

Table 3： SAR System Check Result

4.2.3 Detailed System Check Results

Please see the Appendix A

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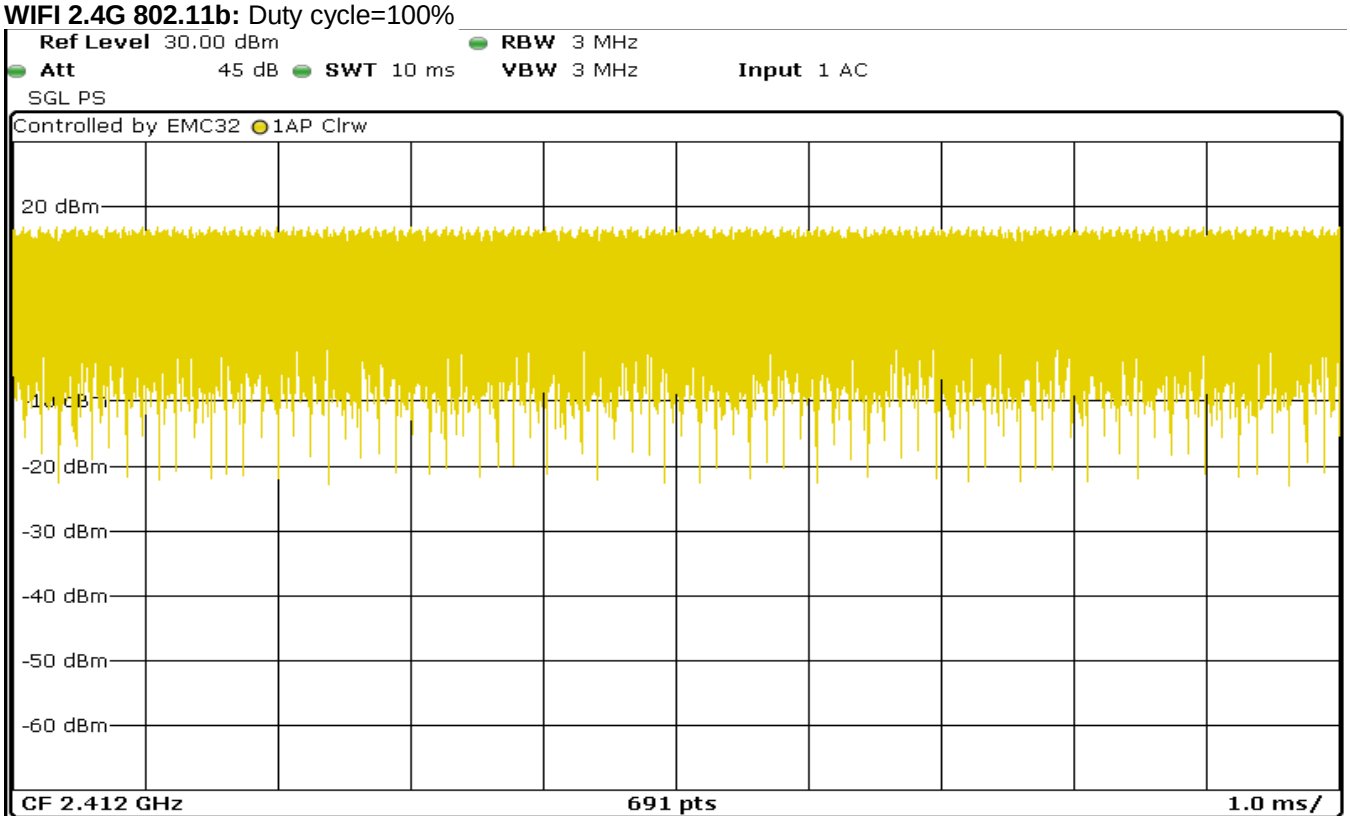
5 Test results and Measurement Data

5.1 Operation Configurations

5.1.1 WiFi Test Configuration

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement.

WIFI 2.4G 802.11b: Duty cycle=100%



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5.1.1.1 Initial Test Position SAR Test Reduction Procedure

DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures. The initial test position procedure is described in the following:

1）. When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band. SAR is also not required for that exposure configuration in the subsequent test configuration(s).
2）. When the reported SAR of the initial test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position using subsequent highest extrapolated or estimated 1-g SAR conditions determined by area scans or next closest/smallest test separation distance and maximum RF coupling test positions based on manufacturer justification, on the highest maximum output power channel, until the reported SAR is ≤ 0.8 W/kg or all required test positions (left, right, touch, tilt or subsequent surfaces and edges) are tested.
3）. For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested. a) Additional power measurements may be required for this step, which should be limited to those necessary for identifying the subsequent highest output power channels.

5.1.1.2 Initial Test Configuration Procedures

An initial test configuration is determined for OFDM transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. For configurations with the same specified or measured maximum output power, additional transmission mode and test channel selection procedures are required. SAR test reduction for subsequent highest output test channels is determined according to *reported* SAR of the initial test configuration.

For next to the ear, hotspot mode and UMC mini-tablet exposure configurations where multiple test positions are required, the initial test position procedure is applied to minimize the number of test positions required for SAR measurement using the initial test configuration transmission mode. For fixed exposure conditions that do not have multiple SAR test positions, SAR is measured in the transmission mode determined by the initial test configuration.

When the *reported* SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until *reported* SAR is ≤ 1.2 W/kg or all required channels are tested.

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5.1.1.3 Subsequent Test Configuration Procedures

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. The initial test position procedure is applied to next to the ear, UMPC mini-tablet and hotspot mode configurations. When the same maximum output power is specified for multiple transmission modes, additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. The subsequent test configuration and SAR measurement procedures are described in the following.

1）. When SAR test exclusion provisions of KDB Publication 447498 are applicable and SAR measurement is not required for the initial test configuration, SAR is also not required for the next highest maximum output power transmission mode subsequent test configuration(s) in that frequency band or aggregated band and exposure configuration.

2）. When the highest *reported* SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

3）. The number of channels in the initial test configuration and subsequent test configuration can be different due to differences in channel bandwidth. When SAR measurement is required for a subsequent test configuration and the channel bandwidth is smaller than that in the initial test configuration, all channels in the subsequent test configuration that overlap with the larger bandwidth channel tested in the initial test configuration should be used to determine the highest maximum output power channel. This step requires additional power measurement to identify the highest maximum output power channel in the subsequent test configuration to determine SAR test reduction.

a)SAR should first be measured for the channel with highest measured output power in the subsequent test configuration.

b) SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the *reported* SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is > 1.2 W/kg or until all required channels are tested. i) For channels with the same measured maximum output power, SAR should be measured using the channel closest to the center frequency of the larger channel bandwidth channel in the initial test configuration.

4）. SAR measurements for the remaining highest specified maximum output power OFDM transmission mode configurations that have not been tested in the initial test configuration (highest maximum output) or subsequent test configuration(s) (subsequent next highest maximum output power) is determined by recursively applying the subsequent test configuration procedures in this section to the remaining configurations according to the following:

a)replace “subsequent test configuration” with “next subsequent test configuration” (i.e., subsequent next highest specified maximum output power configuration)

b) replace “initial test configuration” with “all tested higher output power configurations”

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5.1.1.4 2.4 GHz SAR Procedures

Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band to simplify DSSS test requirements. For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions. When SAR measurement is required for an OFDM configuration, the initial test configuration, subsequent test configuration and initial test position procedures are applied. The SAR test exclusion requirements for 802.11g/n OFDM configurations are described in following.

- **802.11b DSSS SAR Test Requirements**

SAR is measured for 2.4 GHz 802.11b DSSS using either a fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:

1）. When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.

2）. When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.

- **2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements**

When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied (section 5.3, including sub-sections). SAR is not required for the following 2.4 GHz OFDM conditions.

1）. When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.

2）. When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

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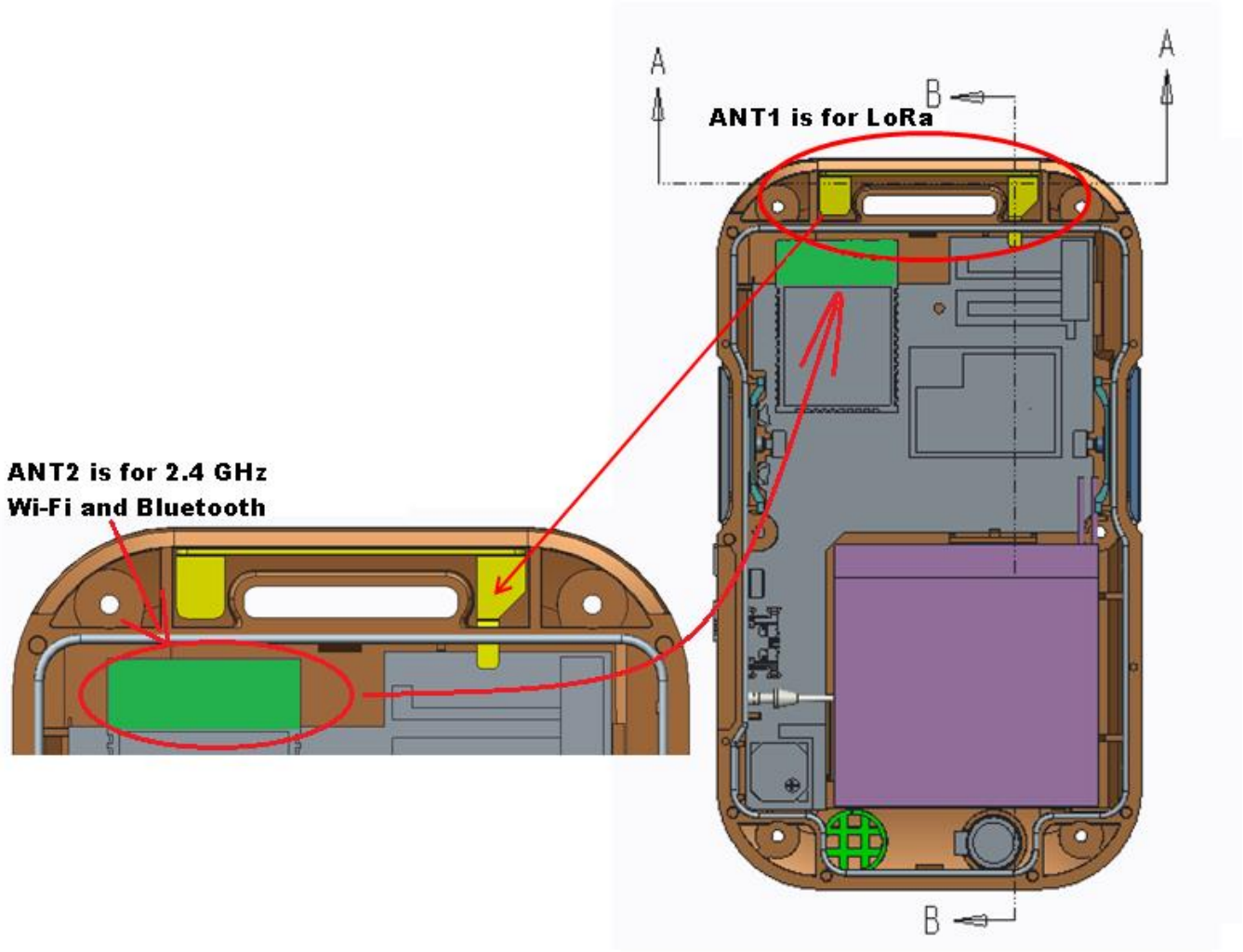
5.1.2 DUT Antenna Locations



EUT Sides for SAR Testing						
Mode	Front	Back	Left	Right	Top	Bottom
WIFI 2.4G	Yes	Yes	Yes	Yes	Yes	Yes
Bluetooth	Yes	Yes	Yes	Yes	Yes	Yes
Lora	Yes	Yes	Yes	Yes	Yes	Yes

Table 4： EUT Sides for SAR Testing

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5.1.3 Stand-alone SAR test evaluation

Unless specifically required by the published RF exposure KDB procedures, standalone 1-g body SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.

Freq. Band	Frequency (GHz)	Position	Average Power		Test Separation (mm)	Calculate Value	Exclusion Threshold	Exclusion (Y/N)
			dBm	mW				
WiFi 2.4G	2.462	Body	17	50.12	5	15.73	3	N
Bluetooth	2.48	Body	0	1.00	5	0.31	3	Y
Lora (125 kHz)	0.9149	Body	21	125.89	5	24.08	3	N
Lora (500 kHz)	0.9142	Body	21	125.89	5	24.07	3	N

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] · [√f(GHz)] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- 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

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

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5.2 Measurement of RF conducted Power

5.2.1 Conducted Power of WiFi 2.4G

Mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Tune up	Average Power (dBm)	SAR Test
802.11b	1	2412	1	17	**15.05**	Yes
	6	2437		17	**15.35**	Yes
	11	2462		17	**15.27**	Yes
802.11g	1	2412	6	15	13.71	NO
	6	2437		15	13.94	NO
	11	2462		15	13.95	NO
802.11n HT20	1	2412	6.5	15	13.52	NO
	6	2437		15	13.63	NO
	11	2462		15	13.97	NO
802.11n HT40	3	2422	13.5	15	13.76	NO
	6	2437		15	13.61	NO
	9	2452		15	13.53	NO

Table 5： Conducted Power of WiFi 2.4G.

5.2.2 Conducted Power of Bluetooth

BT Classic			Tune up (dBm)	Average Conducted Power(dBm)
Modulation	Channel	Frequency(MHz)		
GFSK	0	2402	-1	-2.43
	39	2441	-1	-1.25
	78	2480	-1	-1.05
BLE			**Tune up (dBm)**	**Average Conducted Power(dBm)**
Modulation	Channel	Frequency(MHz)		
GFSK	0	2402	0	-1.76
	20	2442	0	-0.12
	39	2480	0	-0.53

Table 6： Conducted Power of Bluetooth.

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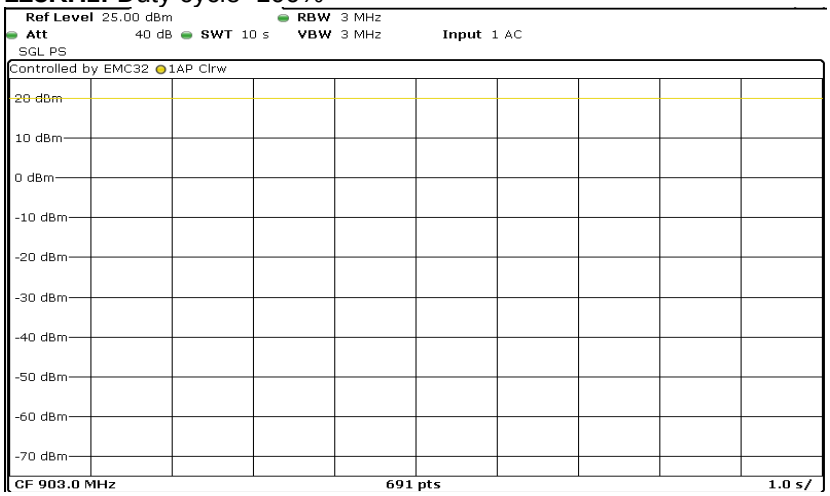
5.2.3 Conducted Power of Lora

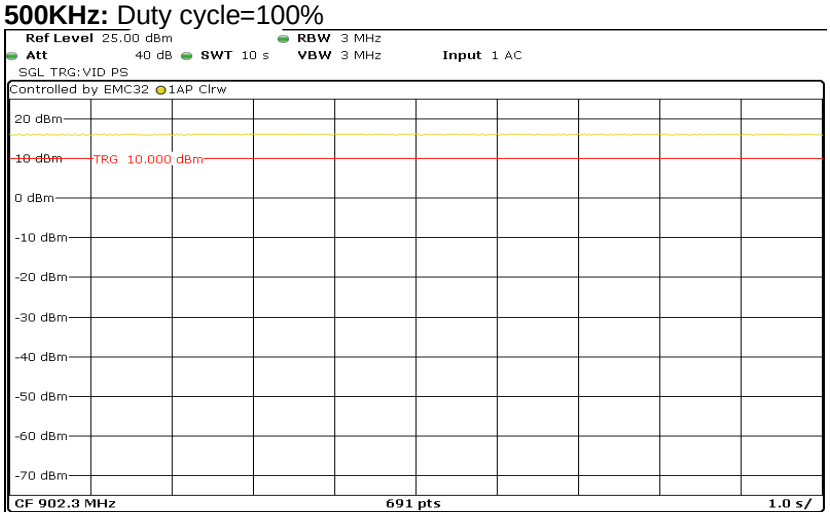
Lora 125kHz			Tune up (dBm)	Average Conducted Power(dBm)
Modulation	Channel	Frequency(MHz)		
DBPSK	0	902.3	21	**20.28**
	32	908.7	21	**20.01**
	63	914.9	21	**20.19**
Lora 500kHz			Tune up (dBm)	Average Conducted Power(dBm)
Modulation	Channel	Frequency(MHz)		
DBPSK	64	903	21	**20.02**
	67	907.8	21	**20.17**
	71	914.2	21	**19.99**

Table 7： Conducted Power of Lora.

125KHz: Duty cycle=100%



500KHz: Duty cycle=100%



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5.3 Measurement of SAR Data

5.3.1 SAR Result of WiFi 2.4G

Test position	Test mode	Test Ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg)1-g	Power drift(dB)	Conducted power(dBm)	Tune up Limit(dBm)	Scaled factor	Scaled SAR(W/kg)	Liquid Temp.
Body Test data (Separate 5mm)											
Front side	802.11b	6/2437	100.00%	1.000	0.755	-0.04	15.35	17.00	1.462	1.104	22
Front side	802.11b	1/2412	100.00%	1.000	0.728	0.05	15.05	17.00	1.567	1.141	22
Front side	802.11b	11/2462	100.00%	1.000	0.760	-0.08	15.27	17.00	1.489	1.132	22
Back side	802.11b	6/2437	100.00%	1.000	0.754	0.13	15.35	17.00	1.462	1.102	22
Back side	802.11b	1/2412	100.00%	1.000	0.730	0.01	15.05	17.00	1.567	1.144	22
Back side	802.11b	11/2462	100.00%	1.000	0.770	-0.04	15.27	17.00	1.489	**1.147**	22
Left side	802.11b	6/2437	100.00%	1.000	0.332	0.03	15.35	17.00	1.462	0.485	22
Right side	802.11b	6/2437	100.00%	1.000	0.003	-0.04	15.35	17.00	1.462	0.004	22
Top side	802.11b	6/2437	100.00%	1.000	0.109	-0.12	15.35	17.00	1.462	0.159	22
Bottom side	802.11b	6/2437	100.00%	1.000	0.038	-0.07	15.35	17.00	1.462	0.056	22

Table 8： SAR of WiFi 2.4G.

Note:

1) The maximum Scaled SAR value is marked in **bold**. Graph Results refer to Appendix B

2) If the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is not required for such test configuration(s).

3) Upper and lower frequencies were measured at the worst position.

4) The SAR test at 100% duty cycle.

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5.3.2 SAR Result of Lora

Lora 125kHz SAR Test Record											
Test position	Test mode	Test Ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg)1-g	Power drift(dB)	Conducted power(dBm)	Tune up Limit(dBm)	Scaled factor	Scaled SAR(W/kg)	Liquid Temp.
Body Test data (Separate 5mm)											
Front side	DBPSK	0/902.3	100.00%	1.00	0.886	-0.14	20.28	21.00	1.180	1.046	21.9
Front side	DBPSK	32/908.7	100.00%	1.00	0.879	0.02	20.01	21.00	1.256	1.104	21.9
Front side	DBPSK	63/914.9	100.00%	1.00	0.895	0.01	20.19	21.00	1.205	1.079	21.9
Back side	DBPSK	0/902.3	100.00%	1.00	1.110	-0.04	20.28	21.00	1.180	**1.310**	21.9
Back side-repeat	DBPSK	0/902.3	100.00%	1.00	1.070	0.08	20.28	21.00	1.180	1.263	21.9
Back side	DBPSK	32/908.7	100.00%	1.00	1.040	0.17	20.01	21.00	1.256	1.306	21.9
Back side	DBPSK	63/914.9	100.00%	1.00	1.060	0.07	20.19	21.00	1.205	1.277	21.9
Left side	DBPSK	0/902.3	100.00%	1.00	0.465	-0.18	20.28	21.00	1.180	0.549	21.9
Right side	DBPSK	0/902.3	100.00%	1.00	0.164	0.03	20.28	21.00	1.180	0.194	21.9
Top side	DBPSK	0/902.3	100.00%	1.00	0.095	0.17	20.28	21.00	1.180	0.112	21.9
Bottom side	DBPSK	0/902.3	100.00%	1.00	0.099	-0.17	20.28	21.00	1.180	0.117	21.9

Table 9： SAR of Lora 125KHz.

Note:

1) The maximum Scaled SAR value is marked in **bold**. Graph Results refer to Appendix B

2) If the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is not required for such test configuration(s).

3) Upper and lower frequencies were measured at the worst position.

Test Position	Channel/ Frequency (MHz)	Measured SAR (1g)	1st Repeated SAR (1g)	Ratio	2nd Repeated SAR (1g)	3rd Repeated SAR (1g)
Back side	0/902.3	1.110	1.070	1.037	N/A	N/A
Note: 1) When the original highest measured SAR is ≥ 0.80 W/kg, the measurement was repeated once.						
2) A second repeated measurement was preformed only if the ratio of largest to smallest SAR for the original and first repeated measurements was > 1.20 or when the original or repeated measurement was ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).						
3) A third repeated measurement was preformed only if the original, first or second repeated measurement was ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.						
4) Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg						

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Lora 500kHz SAR Test Record											
Test position	Test mode	Test Ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg)1-g	Power drift(dB)	Conducted power(dBm)	Tune up Limit(dBm)	Scaled factor	Scaled SAR(W/kg)	Liquid Temp.
Body Test data (Separate 5mm)											
Front side	DBPSK	67/907.8	100.00%	1.00	0.893	-0.17	20.17	21.00	1.211	1.081	21.9
Front side	DBPSK	64/903	100.00%	1.00	0.918	0.01	20.02	21.00	1.253	1.150	21.9
Front side	DBPSK	71/914.2	100.00%	1.00	0.885	0.09	19.99	21.00	1.262	1.117	21.9
Back side	DBPSK	67/907.8	100.00%	1.00	1.110	-0.14	20.17	21.00	1.211	**1.344**	21.9
Back side-repeat	DBPSK	67/907.8	100.00%	1.00	1.050	0.05	20.17	21.00	1.211	1.271	21.9
Back side	DBPSK	64/903	100.00%	1.00	1.070	0.11	20.02	21.00	1.253	1.341	21.9
Back side	DBPSK	71/914.2	100.00%	1.00	1.060	0.08	19.99	21.00	1.262	1.338	21.9
Left side	DBPSK	67/907.8	100.00%	1.00	0.469	-0.02	20.17	21.00	1.211	0.568	21.9
Right side	DBPSK	67/907.8	100.00%	1.00	0.166	0.13	20.17	21.00	1.211	0.201	21.9
Top side	DBPSK	67/907.8	100.00%	1.00	0.104	-0.13	20.17	21.00	1.211	0.126	21.9
Bottom side	DBPSK	67/907.8	100.00%	1.00	0.095	0.14	20.17	21.00	1.211	0.115	21.9

Table 10：SAR of Lora 500KHz.

Note:

4) The maximum Scaled SAR value is marked in **bold**. Graph Results refer to Appendix B

5) If the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is not required for such test configuration(s).

6) Upper and lower frequencies were measured at the worst position.

Test Position	Channel/ Frequency (MHz)	Measured SAR (1g)	1st Repeated SAR (1g)	Ratio	2nd Repeated SAR (1g)	3rd Repeated SAR (1g)
Back Side	67/907.8	1.110	1.050	1.057	N/A	N/A
Note: 1) When the original highest measured SAR is ≥ 0.80 W/kg, the measurement was repeated once.						
2) A second repeated measurement was preformed only if the ratio of largest to smallest SAR for the original and first repeated measurements was > 1.20 or when the original or repeated measurement was ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).						
3) A third repeated measurement was preformed only if the original, first or second repeated measurement was ⩾ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.						
4) Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg						

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5.4 Multiple Transmitter Evaluation

5.4.1 Simultaneous SAR SAR test evaluation

- **Simultaneous Transmission Possibilities**

NO	Simultaneous TX Combination	Body
1	WIFI 2.4G + Bluetooth	No
2	WIFI 2.4G + Lora	No
3	Bluetooth + Lora	No

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6 Equipment list

Test Platform	SPEAG DASY5 Professional					
Location	SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch					
Description	SAR Test System (Frequency range 300MHz-6GHz)					
Software Reference	DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)					
Hardware Reference						
Equipment		Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	Twin Phantom	SPEAG	SAM 3	1912	NCR	NCR
☒	DAE	SPEAG	DAE4	1267	2020-06-12	2021-06-11
☒	E-Field Probe	SPEAG	EX3DV4	3962	2020-04-01	2021-03-31
☒	Validation Kits	SPEAG	D835V2	4d105	2019-12-17	2022-12-16
☒	Validation Kits	SPEAG	D2450V2	733	2019-12-17	2022-12-16
☒	Agilent Network Analyzer	Agilent	E5071C	MY46523591	2020-04-16	2021-04-15
☒	Dielectric Probe Kit	Agilent	85070E	US01440210	NCR	NCR
☒	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR
☒	Signal Generator	Agilent	N5171B	MY53050736	2020-04-15	2021-04-14
☒	Preamplifier	Mini-Circuits	ZHL-42W	15542	NCR	NCR
☒	Power Meter	Agilent	E4416A	GB41292095	2020-04-15	2021-04-14
☒	Power Sensor	Agilent	8481H	MY41091234	2020-04-15	2021-04-14
☒	Power Sensor	R&S	NRP-Z92	100025	2020-04-16	2021-04-15
☒	Attenuator	SHX	TS2-3dB	30704	NCR	NCR
☒	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR
☒	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR
☒	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR
☒	Speed reading thermometer	MingGao	T809	NA	2020-04-21	2021-04-20
☒	Humidity and Temperature Indicator	KIMTOKA	KIMTOKA	NA	2020-04-21	2021-04-20

Note: All the equipments are within the valid period when the tests are performed.

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7 Measurement Uncertainty

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

8 Calibration certificate

Please see the Appendix C

9 Photographs

Please see the Appendix D

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Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs

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