SAR TEST REPORT

For

CREATIVE LABS PTE. LTD.

Creative Zen Hybrid Gen 2

Test Model: EF1220

Prepared for	:	CREATIVE LABS PTE. LTD.
Address	:	31 International Business Park #03-01, Singapore 609921
Prepared by	:	Shenzhen LCS Compliance Testing Laboratory Ltd.
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Date of receipt of test sample	:	June 24, 2024
Number of tested samples	:	1
Sample number	:	A240621116-1
Serial number	:	Prototype
Date of Test	:	June 24, 2024 ~ June 24, 2024
Date of Report	:	July 12, 2024

SAR TEST REPORT	
Report Reference No..... :	**LCSA06214093EC**
Date Of Issue.....:	July 12, 2024
Testing Laboratory Name.....:	**Shenzhen LCS Compliance Testing Laboratory Ltd.**
Address.....:	101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Yabianxueziwei, Shajing Street, Baoan District, Shenzhen, 518000, China
Testing Location/ Procedure.....:	Full application of Harmonised standards ■ Partial application of Harmonised standards ☐ Other standard testing method ☐
Applicant's Name..... :	**CREATIVE LABS PTE. LTD.**
Address..... :	31 International Business Park #03-01, Singapore 609921
Test Specification:	
Standard.....:	FCC 47CFR §2.1093, ANSI/IEEE C95.1-2019, IEEE 1528-2013
Test Report Form No..... :	TRF-4-E-102 A/0
TRF Originator.....:	Shenzhen LCS Compliance Testing Laboratory Ltd.
Master TRF.....:	Dated 2014-09

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Test Item Description.....:	**Creative Zen Hybrid Gen 2**
Trade Mark.....:	CREATIVE
Model/Type Reference.....:	EF1220
Ratings.....:	Recharge voltage: 5V⎓ 1A Battery: 3.7V⎓, 600mAh, 2.22Wh
Result .....:	**Positive**

Compiled by:	Supervised by:	Approved by:
Jay Zhan/ File administrators	Cary Luo / Technique principal	Gavin Liang/ Manager

SAR -- TEST REPORT

Test Report No. :	**LCSA06214093EC**	July 12, 2024 Date of issue

EUT.....	:	Creative Zen Hybrid Gen 2
Type/Model	:	EF1220
Applicant.....	:	**CREATIVE LABS PTE. LTD.**
Address.....	:	31 International Business Park #03-01, Singapore 609921
Telephone.....	:	/
Fax.....	:	/
Manufacturer.....	:	**CREATIVE LABS PTE. LTD.**
Address.....	:	31 International Business Park #03-01, Singapore 609921
Telephone.....	:	/
Fax.....	:	/
Factory.....	:	/
Address.....	:	/
Telephone.....	:	/
Fax.....	:	/

Test Result	**Positive**

The test report merely corresponds to the test sample.
It is not permitted to copy extracts of these test result without the written permission of the test laboratory.

Revison History

Revision	Issue Date	Revision Content	Revised By
000	July 12, 2024	Initial Issue	---

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1. TEST STANDARDS AND TEST DESCRIPTION

1.1. Statement of Compliance

The maximum of results of SAR found during testing for EF1220 are follows:

<Highest Reported standalone SAR Summary>

Classment Class	Frequency Band	Body (Report SAR1-g (W/kg)
		(Separation Distance 0mm)
DSS	Bluetooth	0.181

Note

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

1.2. Test Location

Company:	Shenzhen LCS Compliance Testing Laboratory Ltd.
Address:	101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Yabianxueziwei, Shajing Street, Baoan District, Shenzhen, 518000, China
Telephone:	(+86)755-82591330
Fax:	(+86)755-82591330
Web:	www.LCS-cert.com
E-mail:	webmaster@LCS-cert.com

1.3. Test Facility

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

Site Description

SAR Lab. : NVLAP Accreditation Code is 600167-0.
FCC Designation Number is CN5024.
CAB identifier is CN0071.
CNAS Registration Number is L4595.
Test Firm Registration Number: 254912.

1.4. Test Laboratory Environment

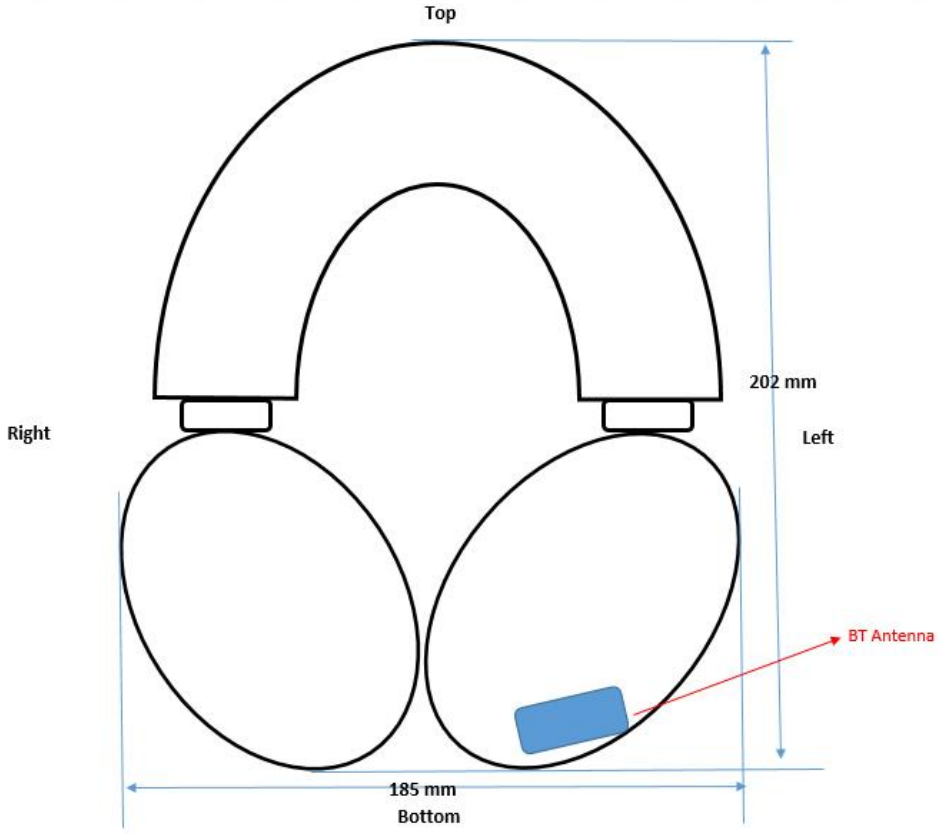
Temperature	Min. = 18°C, Max. = 25 °C
Relative humidity	Min. = 30%, Max. = 70%
Ground system resistance	< 0.5
Atmospheric pressure:	950-1050mbar
Ambient noise is checked and found very low and in compliance with requirement of standards. Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

1.5. Product Description

The **CREATIVE LABS PTE. LTD.**'s Model: EF1220 or the "EUT" as referred to in this report; more general information as follows, for more details, refer to the user's manual of the EUT.

EUT	:	Creative Zen Hybrid Gen 2
Test Model	:	EF1220
Power Supply	:	Recharge voltage: 5V⎓ 1A Battery: 3.7V⎓, 600mAh, 2.22Wh
Hardware Version	:	V1.3
Software Version	:	V0.0.2.
Bluetooth	:	
Frequency Range	:	2402MHz~2480MHz
Channel Number	:	79 channels for Bluetooth V5.4(DSS) 40 channels for Bluetooth V5.4 (DTS)
Channel Spacing	:	1MHz for Bluetooth V5.4 (DSS) 2MHz for Bluetooth V5.4 (DTS)
Modulation Type	:	GFSK, π/4-DQPSK, 8-DPSK for Bluetooth V5.4(DSS) GFSK for Bluetooth V5.4 (DTS)
Bluetooth Version	:	V5.4
Antenna Description	:	Internal Antenna, 1.85dBi((Max.)

1.6. DUT Antenna Locations(Rear View)



1.7. Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE C95.1-2019	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	General RF Exposure Guidance v06
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02
KDB 248227 D01	SAR Guidance for IEEE 802 11 Wi-Fi SAR v02r02

1.8. RF exposure limits

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

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.)

1.9. Equipment list

Test Platform	SPEAG DASY5 Professional
Description	SAR Test System (Frequency range 300MHz-6GHz)
Software Reference	DASY52; SEMCAD X

Hardware Reference

	Equipment	Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	PC	Lenovo	NA	NA	NA[1]	NA[1]
☒	Twin Phantom	SPEAG	SAM V5.0	1850	NA[1]	NA[1]
☒	ELI Phantom	SPEAG	ELI V6.0	2010	NA[1]	NA[1]
☒	DAE	SPEAG	DAE3	373	2024/1/3	2025/1/2
☒	E-Field Probe	SPEAG	EX3DV4	3805	2023/11/23	2024/11/22
☒	Validation Kits	SPEAG	D2450V2	808	2023/10/23	2026/10/22
☒	Agilent Network Analyzer	Agilent	8753E	SU38432944	2024/6/6	2025/6/5
☒	Dielectric Probe Kit	SPEAG	DAK3.5	1425	2024/6/6	2025/6/5
☒	Universal Radio Communication Tester	R&S	CMW500	42115	2023/10/29	2024/10/28
☒	Directional Coupler	MCLI/USA	4426-20	03746	2024/6/6	2025/6/5
☒	Power meter	Agilent	E4419B	MY45104493	2023/10/29	2024/10/28
☒	Power meter	Agilent	E4419B	MY45100308	2023/10/29	2024/10/28
☒	Power sensor	Agilent	E9301H	MY41495616	2023/10/29	2024/10/28
☒	Power sensor	Agilent	E9301H	MY41495234	2023/10/29	2024/10/28
☒	Signal Generator	Agilent	E4438C	MY49072627	2024/6/6	2025/6/5
☒	Broadband Preamplifier	/	BP-01M18G	P190501	2024/6/6	2025/6/5
☒	DC POWER SUPPLY	I-SHENG	SP-504	NA	2024/6/6	2025/6/5
☒	Speed reading thermometer	HTC-1	NA	LCS-E-138	2024/6/6	2025/6/5

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

"1" : NA as this is not measurement equipment.

2. SAR MEASUREMENTS SYSTEM CONFIGURATION

2.1. SAR Measurement System

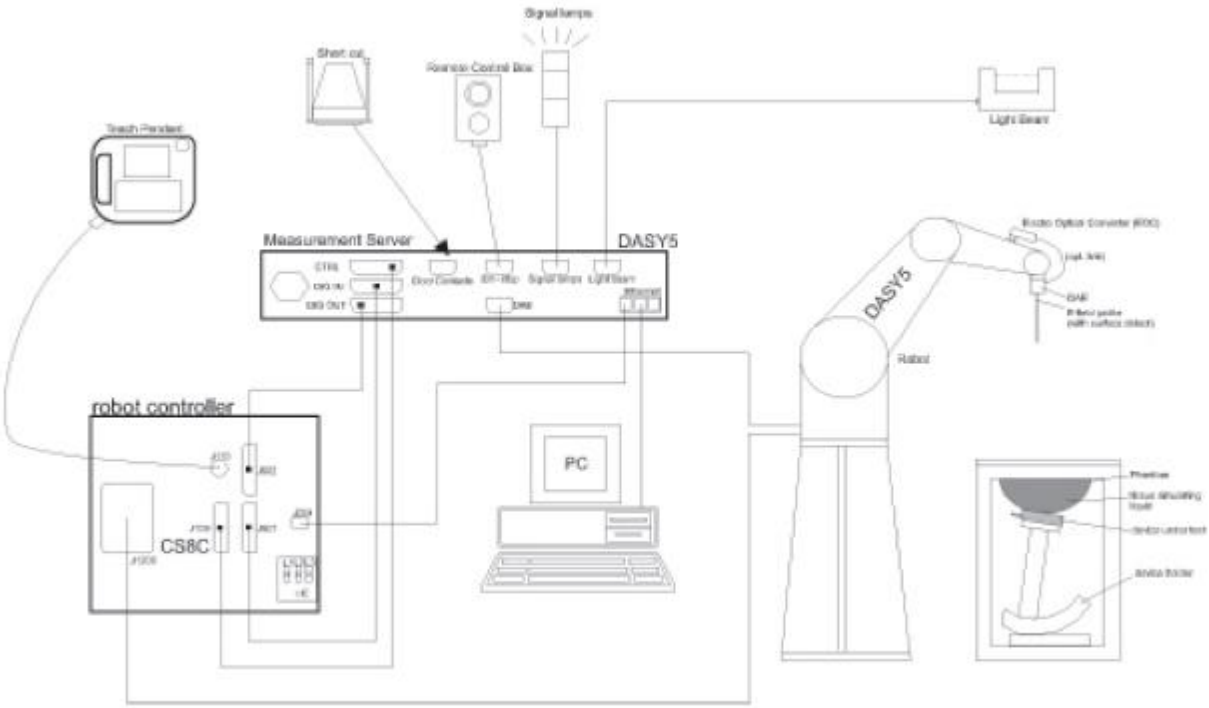
This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the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

- 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.

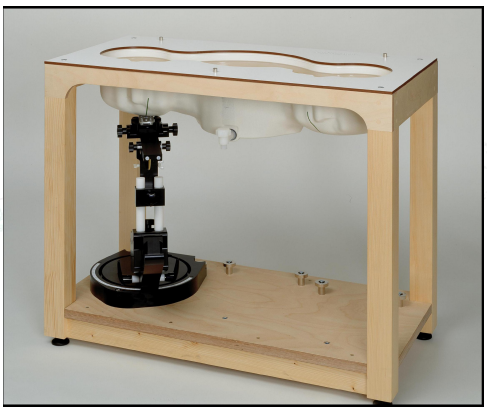
2.2. Isotropic E-field Probe EX3DV4

	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

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	

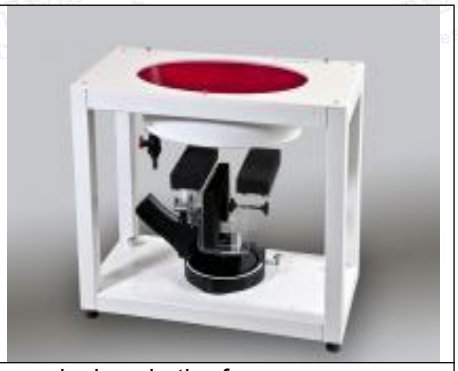
2.4. SAM Twin Phantom

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 IEC-IEEE 62209-1528. 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.

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.

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.

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 32mm*32mm*30mm (f≤2GHz), 30mm*30mm*30mm (f for 2-3GHz) and 24mm*24mm*22mm (f for 5-6GHz) was assessed by measuring 5x5x7 points (f≤2GHz), 7x7x7 points (f for 2-3GHz) and 7x7x12 points (f for 5-6GHz). 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.

			≤ 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

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 %

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 ".DAE4". 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)

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

3. SAR measurement variability and uncertainty

3.1. SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

2) When the original highest measured SAR is ⩾ 0.80 W/kg, repeat that measurement once.

3) 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 ⩾ 1.45 W/kg (~ 10% from the 1-g SAR limit).

4) Perform a third repeated measurement only if the original, first or second repeated measurement is ⩾1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

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.

3.2. SAR 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.

4. Description of Test Position

4.1. Test Positions Configuration

Per FCC KDB616217 D04, The required minimum test separation distance for incorporating transmitters and antennas into laptop, notebook and netbook computer displays is determined with the display screen opened at an angle of 90° to the keyboard compartment. If a computer has other operating configurations that require a different or more conservative display to keyboard angle for normal use, a KDB inquiry should be submitted to determine the test requirements. When antennas are incorporated in the keyboard section of a laptop computer, SAR is required for the bottom surface of the keyboard.
Provided tablet use conditions are not supported by the laptop computer, SAR tests for bystander exposure from the edges of the keyboard and display screen of laptop computers are generally not required. However, when edge testing is necessary, the similar concerns for simultaneous transmission on adjacent or multiple edges described for tablets also apply.

For this device, the transmit antenna are located at the screen section.
Body operating configurations are tested with the device bottom side positioned against a flat phantom with test separation distance of 0mm in a normal use configuration.

5. SAR System Verification Procedure

5.1. Tissue Simulate Liquid

5.1.1. 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	1750-2000	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 Water: De-ionized, 16 MΩ+ resistivity Tween: Polyoxyethylene (20) sorbitan monolaurate			Sucrose: 98+% Pure Sucrose HEC: Hydroxyethyl Cellulose		
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

5.1.2. Measurement for Tissue Simulate Liquid

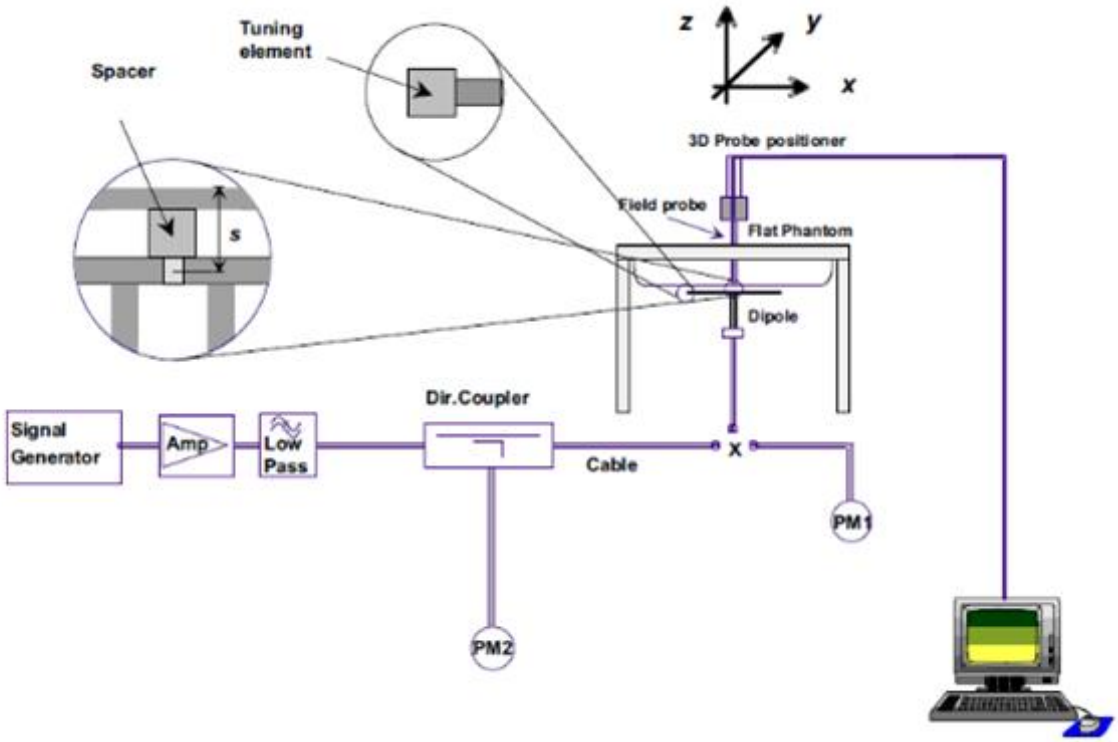
The dielectric properties for this Tissue Simulate Liquids were measured by using the DAKS. The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was 22±2°C.

Tissue Type	Measured Frequency (MHz)	Target Tissue (±5%)		Measured Tissue		Liquid Temp. (℃)	Measured Date
		ε_r	σ(S/m)	ε_r	σ(S/m)		
2450 Head	2450	39.2 (37.24~41.16)	1.8 (1.71~1.89)	39.741	1.826	22.2	June 24, 2024

Table 2： Measurement result of Tissue electric parameters

5.2. SAR System Check

The microwave circuit arrangement for system Check is sketched in F-1. 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-1. the microwave circuit arrangement used for SAR system check

5.2.1. 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 20% 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.

5.2.2. 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)		
D2450V2	Head	12.68	5.79	50.72	23.16	53.5 (48.15~58.85)	24.8 (22.32~27.28)	22.2	June 24, 2024

Table 3： Please see the Appendix A

6. SAR measurement procedure

The measurement procedures are as follows:

6.1. Conducted power measurement

a. For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously Transmission, at maximum RF power in each supported wireless interface and frequency band.
b. Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power.

6.2. WIFI Test Configuration

The SAR measurement and test reduction procedures are structured according to either the DSSS or OFDM transmission mode configurations used in each standalone frequency band and aggregated band. For devices that operate in exposure configurations that require multiple test positions, additional SAR test reduction may be applied. The maximum output power specified for production units, including tune-up tolerance, are used to determine initial SAR test requirements for the 802.11 transmission modes in a frequency band. SAR is measured using the highest measured maximum output power channel for the initial test configuration. SAR measurement and test reduction for the remaining 802.11 modes and test channels are determined according to measured or specified maximum output power and reported SAR of the initial measurements. The general test reduction and SAR measurement approaches are summarized in the following:
1. The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures.
2. For OFDM transmission configurations in the 2.4 GHz and 5 GHz bands, an “initial test configuration” is first determined for each standalone and aggregated frequency band according to the maximum output power and tune-up tolerance specified for production units.
a. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.
b. SAR is measured for OFDM configurations using the initial test configuration procedures. Additional frequency band specific SAR test reduction may be considered for individual frequency bands
c. Depending on the reported SAR of the highest maximum output power channel tested in the initial test configuration, SAR test reduction may apply to subsequent highest output channels in the initial test configuration to reduce the number of SAR measurements.
3. The Initial test configuration does not apply to DSSS. The 2.4 GHz band SAR test requirements and 802.11b DSSS procedures are used to establish the transmission configurations required for SAR measurement.
4. An “initial test position”is applied to further reduce the number of SAR tests for devices operating in next to the ear, UMPC mini-tablet or hotspot mode exposure configurations that require multiple test positions .
a. SAR is measured for 802.11b according to the 2.4 GHz DSSS procedure using the exposure condition established by the initial test position.
b. SAR is measured for 2.4 GHz and 5 GHz OFDM configurations using the initial test configuration. 802.11b/g/n operating modes are tested independently according to the service requirements in each frequency band. 802.11b/g/n modes are tested on the maximum average output channel.
5. The Initial test position does not apply to devices that require a fixed exposure test position. SAR is measured in a fixed exposure test position for these devices in 802.11b according to the 2.4 GHz DSSS procedure or in 2.4 GHz and 5 GHz OFDM configurations using the initial test configuration procedures .
6. The “subsequent test configuration”procedures are applied to determine if additional SAR measurements are required for the remaining OFDM transmission modes that have not been tested in the initial test configuration. SAR test exclusion is determined according to reported SAR in the initial test configuration and maximum output power specified or measured for these other OFDM configurations.

2.4 GHz and 5GHz 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 section 5.2.2.
1. 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:

a. When the reported SAR of the highest measured maximum output power channel (section 3.1) for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
b. 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.

1. 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). SAR is not required for the following 2.4 GHz OFDM conditions.

a. When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration
b. 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.

2. SAR Test Requirements for OFDM Configurations

When SAR measurement is required for 802.11 a/g/n/ac OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. When the same transmitter and antenna(s) are used for U-NII-1 and U-NII-2A bands, additional SAR test reduction applies. When band gap channels between U-NII-2C band and 5.8 GHz U-NII-3 or §15.247 band are supported, the highest maximum output power transmission mode configuration and maximum output power channel across the bands must be used to determine SAR test reduction, according to the initial test configuration and subsequent test configuration requirements.20 In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

3. OFDM Transmission Mode SAR Test Configuration and Channel Selection Requirements

The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures (section 4). When multiple configurations in a frequency band have the same specified maximum output power, the initial test configuration is determined according to the following steps applied sequentially.

a. The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
b. If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
c. If multiple configurations have the same specified maximum output power, largest channel bandwidth and lowest order modulation, the lowest data rate configuration among these configurations is selected.
d. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n.

After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following. These channel selection procedures apply to both the initial test configuration and subsequent test configuration(s), with respect to the default power measurement procedures or additional power measurements required for further SAR test reduction. The same procedures also apply to subsequent highest output power channel(s) selection.

a. Channels with measured maximum output power within ¼ dB of each other are considered to have the same maximum output.
b. When there are multiple test channels with the same measured maximum output power, the channel closest to mid-band frequency is selected for SAR measurement.
c. When there are multiple test channels with the same measured maximum output power and equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

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 (see section 5.3.2). SAR test reduction of subsequent highest output test channels is based on the 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.23 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 the subsequent next highest measured output power channel(s) in the initial test configuration until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.

4. 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, the procedures in section 5.3.2 are applied to determine the test configuration. 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.

a. 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.
b. 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.
c. 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.

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

2). 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.

a) 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.

d. 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 applying the subsequent test configuration procedures in this section to the remaining configurations according to the following:

1) replace “subsequent test configuration” with “next subsequent test configuration” (i.e., subsequent next highest specified maximum output power configuration)
2) replace “initial test configuration” with “all tested higher output power configurations.

6.3. Power Reduction

The product without any power reduction.

6.4. Power Drift

To control the output power stability during the SAR test, SAR system calculates the power drift by measuring the E-field at the same location at the beginning and at the end of the measurement for each test position. This ensures that the power drift during one measurement is within ±0.2dB.

7. TEST CONDITIONS AND RESULTS

7.1. Conducted Power Results

7.1.1. Conducted Power Measurement Results(Bluetooth)

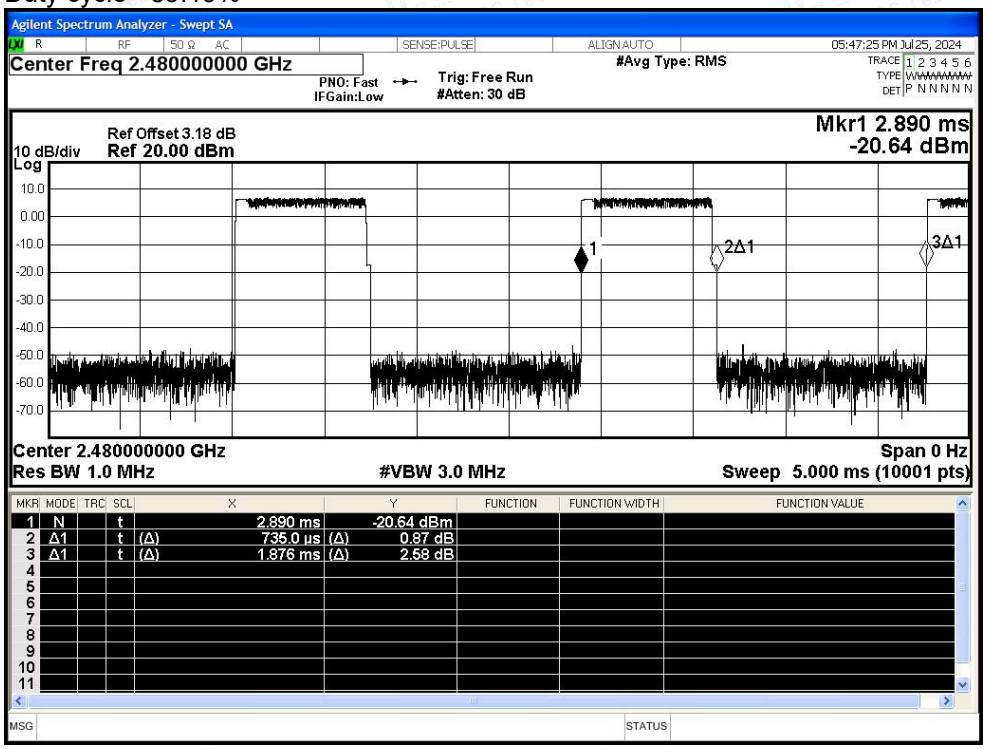
Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Tune up (dBm)
NVNT	1-DH5	2402	Ant1	5.58	6.00
NVNT	1-DH5	2441	Ant1	5.76	6.00
NVNT	1-DH5	2480	Ant1	6.06	7.00
NVNT	2-DH5	2402	Ant1	6.38	7.00
NVNT	2-DH5	2441	Ant1	6.48	7.00
NVNT	2-DH5	2480	Ant1	6.83	7.00
NVNT	3-DH5	2402	Ant1	6.38	7.00
NVNT	3-DH5	2441	Ant1	6.59	7.00
NVNT	3-DH5	2480	Ant1	6.85	7.00

BLE

Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Tune up (dBm)
NVNT	BLE 1M	2402	Ant1	5.66	6.00
NVNT	BLE 1M	2440	Ant1	5.83	6.00
NVNT	BLE 1M	2480	Ant1	6.19	6.50
NVNT	BLE 2M	2402	Ant1	6.65	7.00
NVNT	BLE 2M	2440	Ant1	6.82	7.00
NVNT	BLE 2M	2480	Ant1	7.19	7.50

Bluetooth (BLE-2M):

Duty cycle =39.19%



7.2. SAR Measurement Results

The calculated SAR is obtained by the following formula:

Reported SAR=Measured SAR*$10^{(Ptarget-Pmeasured))/10}$* DutyCycle Factor

Scaling factor=$10^{(Ptarget-Pmeasured))/10}$

DutyCycle Factor=1/Dutycycle%

Reported SAR= Measured SAR* Scaling factor* DutyCycle Factor

Where

P_{target} is the power of manufacturing upper limit;

$P_{measured}$ is the measured power;

Measured SAR is measured SAR at measured power which including power drift)

Reported SAR which including Power Drift and Scaling factor

7.2.1. SAR Results [Bluetooth]

SAR Values [Bluetooth]									
Ch/ Freq. (MHz)	Channel Type	Test Position	Duty Cycle Factor	Conducted Power (dBm)	Maximum Allowed Power (dBm)	PowerDrift (dB)	Scaling Factor	SAR_{1-g} *results(W/kg)*	
								Measured	Reported
measured / reported SAR numbers - Body (distance 0mm)									
39/2480	BLE-2M	Front side	2.552	7.19	7.50	-0.17	1.074	0.032	0.088
39/2480	BLE-2M	Rear side	2.552	7.19	7.50	0.11	1.074	**0.066**	**0.181**

Note:

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

APPENDIX A: DETAILED SYSTEM CHECK RESULTS

1. System Performance Check
System Performance Check 2450 MHz Head

Date: 2024/6/24

Test Laboratory: LCS-SAR Lab

System Check_2450Mhz

DUT: D2450V2; Type: D2450V2; Serial: 808

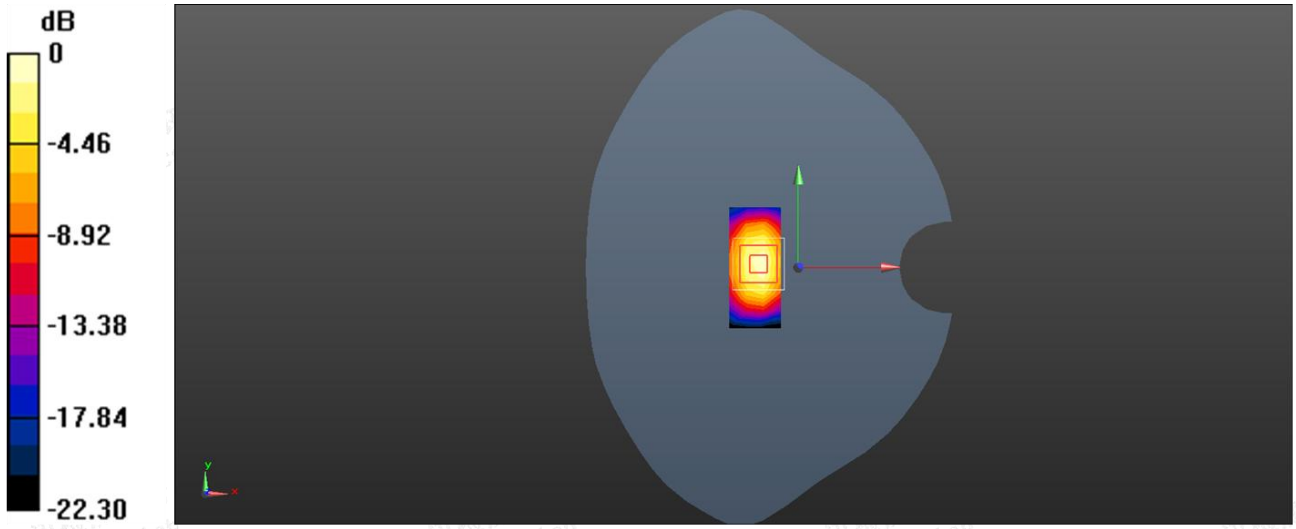
Communication System: UID 0, CW (0); Frequency: 2450 MHz;Duty Cycle: 1:1
Medium parameters used: f = 2450 MHz; σ = 1.826 S/m; ε_r = 39.741; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY Configuration:

- Probe: EX3DV4 - SN3805; ConvF(7.42, 7.42, 7.42); Calibrated: 2023/11/23;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn373; Calibrated: 2024/1/3
- Phantom: SAM v5.0; Type: SAM; Serial: 1850
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

Configuration/Unnamed procedure/Area Scan (4x8x1): Measurement grid: dx=12mm, dy=12mm
Maximum value of SAR (measured) = 16.2W/kg

Configuration/Unnamed procedure/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 82.65 V/m; Power Drift = -0.11 dB
Peak SAR (extrapolated) = 20.1 W/kg
SAR(1 g) = 12.68 W/kg; SAR(10 g) = 5.79 W/kg
Maximum value of SAR (measured) = 17.9 W/kg



0 dB = 17.9 W/kg = 12.53 dBW/kg

APPENDIX B: DETAILED TEST RESULTS

1. BT
BT for Body

Date: 2024/6/24

Test Laboratory: LCS-SAR Lab

Bluetooth BLE-2M 39CH Rear side 0mm

DUT: Creative Zen Hybrid Gen 2; Type: EF1220; Serial: A240621116-1

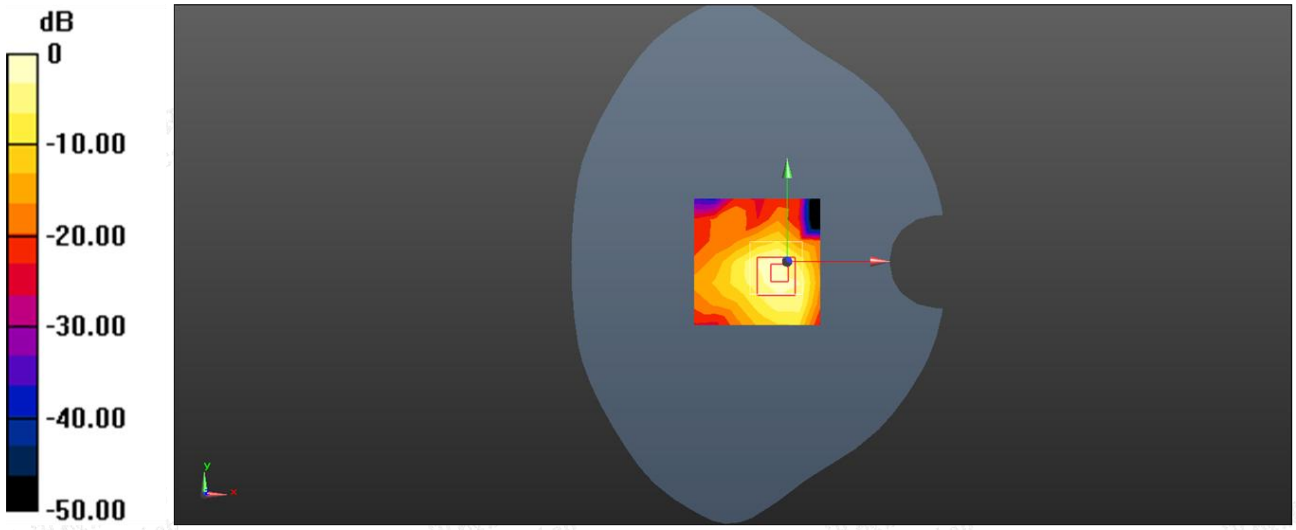
Communication System: UID 0, Bluetooth (0); Frequency: 2480 MHz;Duty Cycle: 1:1.293
Medium parameters used: f = 2480 MHz; σ = 1.798 S/m; ε_r = 39.774; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY Configuration:

- Probe: EX3DV4 - SN3805; ConvF(7.42, 7.42, 7.42); Calibrated: 2023/11/23;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE3 Sn373; Calibrated: 2024/1/3
- Phantom: SAM v5.0; Type: SAM; Serial: 1850
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

Configuration/Unnamed procedure/Area Scan (7x7x1): Measurement grid: dx=12mm, dy=12mm
Maximum value of SAR (measured) = 0.142 W/kg

Configuration/Unnamed procedure/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 0.6733 V/m; Power Drift = 0.11 dB
Peak SAR (extrapolated) = 0.196 W/kg
SAR(1 g) = 0.066 W/kg; SAR(10 g) = 0.047 W/kg
Maximum value of SAR (measured) = 0.136 W/kg



0 dB = 0.136 W/kg = -8.66 dBW/kg

APPENDIX C: CALIBRATION CERTIFICATE

1. Dipole
D2450V2-SN 808(2023-10-23)
2. DAE
DAE3-SN 373(2024-01-03)
3. Probe
EX3DV4-SN 3805(2023-11-23)

In Collaboration with
CTTL speag CALIBRATION LABORATORY
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ilac-MRA CNAS 中国认可 国际互认 校准 CALIBRATION CNAS L0570 CAICT

Client SHENZHEN LCS Certificate No: 23J02Z80105

CALIBRATION CERTIFICATE

Object	D2450V2 - SN: 808
Calibration Procedure(s)	FF-Z11-003-01 Calibration Procedures for dipole validation kits
Calibration date:	October 23, 2023

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

All calibrations have been conducted in the closed laboratory facility: environment temperature (22±3)°C and humidity<70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	106276	15-May-23 (CTTL, No.J23X04183)	May-24
Power sensor NRP6A	101369	15-May-23 (CTTL, No.J23X04183)	May-24
Reference Probe EX3DV4	SN 3617	31-Mar-23(CTTL-SPEAG,No.Z23-60161)	Mar-24
DAE4	SN 1556	11-Jan-23(CTTL-SPEAG,No.Z23-60034)	Jan-24
Secondary Standards	**ID #**	**Cal Date (Calibrated by, Certificate No.)**	**Scheduled Calibration**
Signal Generator E4438C	MY49071430	05-Jan-23 (CTTL, No. J23X00107)	Jan-24
NetworkAnalyzer E5071C	MY46110673	10-Jan-23 (CTTL, No. J23X00104)	Jan-24

	Name	Function	Signature
Calibrated by:	Zhao Jing	SAR Test Engineer	
Reviewed by:	Lin Hao	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: October 31, 2023

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

Certificate No: 23J02Z80105 Page 1 of 6

In Collaboration with
s p e a g
CALIBRATION LABORATORY
CAICT
Add: No.52 HuaYuanBei Road, Haidian District, Beijing, 100191, China
Tel: +86-10-62304633-2117
E-mail: cttl@chinattl.com http://www.caict.ac.cn

Glossary:

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

Calibration is Performed According to the Following Standards:

a) IEC/IEEE 62209-1528, "Measurement Procedure for The Assessment of Specific Absorption Rate of Human Exposure to Radio Frequency Fields from Hand-held and Body-mounted Wireless Communication Devices- Part 1528: Human Models, Instrumentation and Procedures (Frequency range of 4 MHz to 10 GHz)", October 2020

b) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

c) DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

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

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

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Measurement Conditions

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

DASY Version	DASY52	52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Triple Flat Phantom 5.1C	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	2450 MHz ± 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	**Permittivity**	**Conductivity**
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	39.6 ± 6 %	1.81 mho/m ± 6 %
Head TSL temperature change during test	<1.0 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm^3 (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	13.4 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**53.5 W/kg ± 18.8 % (*k*=2)**
SAR averaged over 10 cm^3 (10 g) of Head TSL	Condition	
SAR measured	250 mW input power	6.21 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**24.8 W/kg ± 18.7 % (*k*=2)**

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Appendix (Additional assessments outside the scope of CNAS L0570)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	51.4Ω+ 4.73jΩ
Return Loss	- 26.3dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.061 ns

After long term use with 100W radiated power, only a slight warming of the dipole near the feed-point can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.
No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feed-point may be damaged.

Additional EUT Data

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DASY5 Validation Report for Head TSL Date: 2023-10-23

Test Laboratory: CTTL, Beijing, China

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN: 808

Communication System: UID 0, CW; Frequency: 2450 MHz

Medium parameters used: f = 2450 MHz; σ = 1.813 S/m; ε_r = 39.57; ρ = 1000 kg/m^3

Phantom section: Right Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2007)

DASY5 Configuration:

- Probe: EX3DV4 - SN3617; ConvF(7.68, 7.68, 7.68) @ 2450 MHz; Calibrated: 2023-03-31
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1556; Calibrated: 2023-01-11
- Phantom: MFP_V5.1C (20deg probe tilt); Type: QD 000 P51 Cx; Serial: 1062
- DASY52 52.10.4(1535); SEMCAD X 14.6.14(7501)

Dipole Calibration/Zoom Scan (7x7x7) (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 97.77 V/m; Power Drift = -0.01 dB

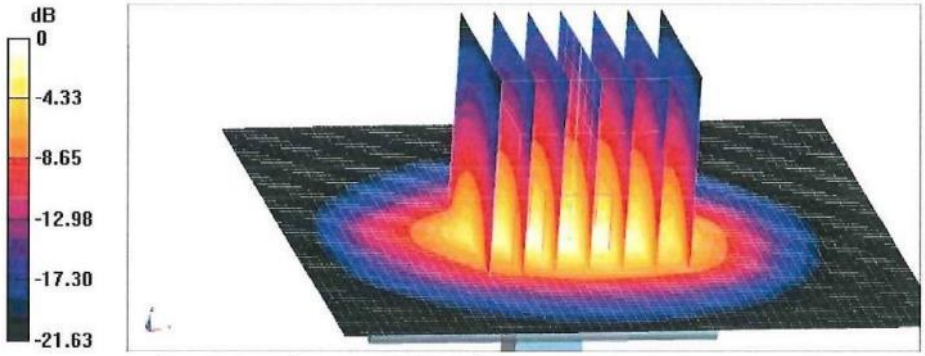
Peak SAR (extrapolated) = 27.8 W/kg

SAR(1 g) = 13.4 W/kg; SAR(10 g) = 6.21 W/kg

Smallest distance from peaks to all points 3 dB below = 8.9 mm

Ratio of SAR at M2 to SAR at M1 = 48.9%

Maximum value of SAR (measured) = 22.5 W/kg



0 dB = 22.5 W/kg = 13.52 dBW/kg

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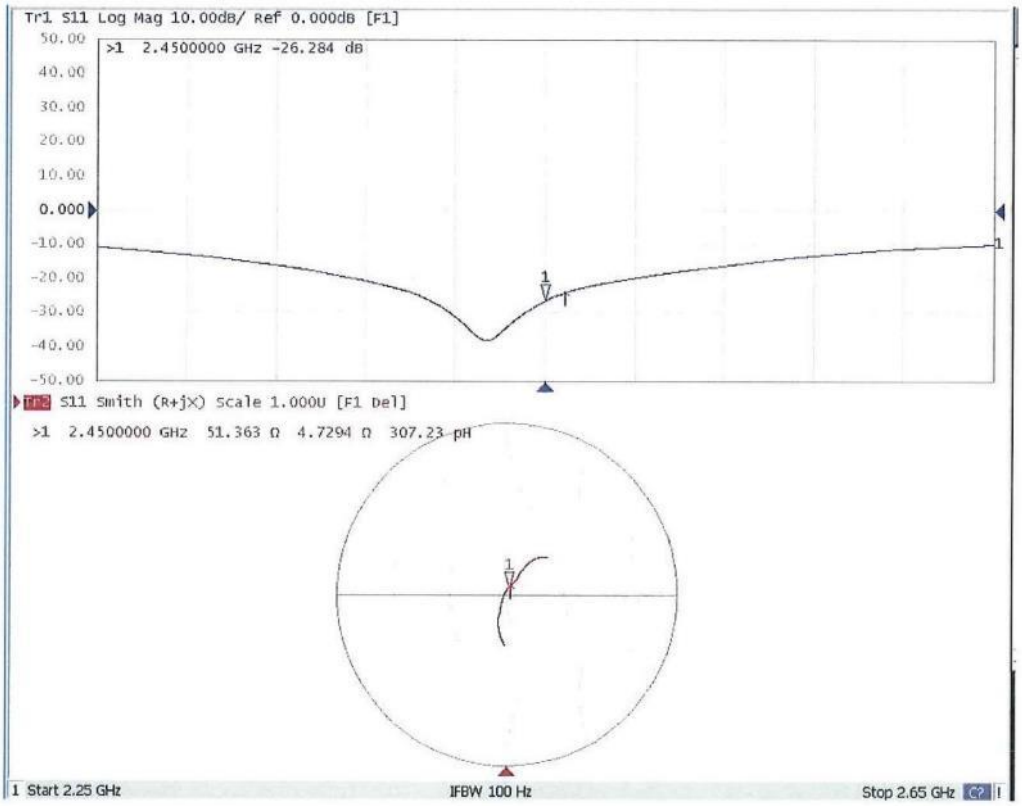
Impedance Measurement Plot for Head TSL



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Client : SHENZHEN LCS Certificate No: 23J02Z80217

CALIBRATION CERTIFICATE

Object	DAE3 - SN: 373
Calibration Procedure(s)	FF-Z11-002-01 Calibration Procedure for the Data Acquisition Electronics (DAEx)
Calibration date:	January 03, 2024

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

All calibrations have been conducted in the closed laboratory facility: environment temperature(22±3)℃ and humidity<70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Process Calibrator 753	1971018	12-Jun-23 (CTTL, No.J23X05436)	Jun-24

	Name	Function	Signature
Calibrated by:	Yu Zongying	SAR Test Engineer	
Reviewed by:	Lin Jun	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: January 04, 2024

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Glossary:

DAE	data acquisition electronics
Connector angle	information used in DASY system to align probe sensor X to the robot coordinate system.

Methods Applied and Interpretation of Parameters:

- *DC Voltage Measurement*: Calibration Factor assessed for use in DASY system by comparison with a calibrated instrument traceable to national standards. The figure given corresponds to the full scale range of the voltmeter in the respective range.
- *Connector angle*: The angle of the connector is assessed measuring the angle mechanically by a tool inserted. Uncertainty is not required.
- The report provide only calibration results for DAE, it does not contain other performance test results.

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DC Voltage Measurement

A/D - Converter Resolution nominal

High Range: 1LSB = 6.1μV , full range = -100...+300 mV
Low Range: 1LSB = 61nV , full range = -1.....+3mV

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

Calibration Factors	X	Y	Z
High Range	402.650 ± 0.15% (k=2)	403.231 ± 0.15% (k=2)	402.697 ± 0.15% (k=2)
Low Range	3.92127 ± 0.7% (k=2)	3.97784 ± 0.7% (k=2)	3.93537 ± 0.7% (k=2)

Connector Angle

Connector Angle to be used in DASY system	293° ± 1 °

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Client SHENZHEN LCS Certificate No: 23J02Z80102

CALIBRATION CERTIFICATE

Object	EX3DV4 - SN : 3805
Calibration Procedure(s)	FF-Z11-004-02 Calibration Procedures for Dosimetric E-field Probes
Calibration date:	November 23, 2023

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

All calibrations have been conducted in the closed laboratory facility: environment temperature(22±3)°C and humidity<70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	101919	12-Jun-23(CTTL, No.J23X05435)	Jun-24
Power sensor NRP-Z91	101547	12-Jun-23(CTTL, No.J23X05435)	Jun-24
Power sensor NRP-Z91	101548	12-Jun-23(CTTL, No.J23X05435)	Jun-24
Reference 10dBAttenuator	18N50W-10dB	19-Jan-23(CTTL, No.J23X00212)	Jan-25
Reference 20dBAttenuator	18N50W-20dB	19-Jan-23(CTTL, No.J23X00211)	Jan-25
Reference Probe EX3DV4	SN 3846	31-May-23(SPEAG, No.EX-3846_May23)	May-24
DAE4	SN 1555	24-Aug-23(SPEAG, No.DAE4-1555_Aug23)	Aug-24
Secondary Standards	**ID #**	**Cal Date(Calibrated by, Certificate No.)**	**Scheduled Calibration**
SignalGenerator MG3700A	6201052605	12-Jun-23(CTTL, No.J23X05434)	Jun-24
Network Analyzer E5071C	MY46110673	10-Jan-23(CTTL, No.J23X00104)	Jan-24
Reference 10dBAttenuator	BT0520	11-May-23(CTTL, No.J23X04061)	May-25
Reference 20dBAttenuator	BT0267	11-May-23(CTTL, No.J23X04062)	May-25
OCP DAK-3.5	SN 1040	18-Jan-23(SPEAG, No.OCP-DAK3.5-1040_Jan23)	Jan-24

	Name	Function	Signature
Calibrated by:	Yu Zongying	SAR Test Engineer	
Reviewed by:	Lin Hao	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: November 28, 2023

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Glossary:

TSL	tissue simulating liquid
NORMx,y,z	sensitivity in free space
ConvF	sensitivity in TSL / NORMx,y,z
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A,B,C,D	modulation dependent linearization parameters
Polarization Φ	Φ rotation around probe axis
Polarization θ	θ rotation around an axis that is in the plane normal to probe axis (at measurement center), i θ=0 is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

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

b) IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016

c) IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010

d) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- *NORMx,y,z:* Assessed for E-field polarization θ=0 (f≤900MHz in TEM-cell; f>1800MHz: waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not effect the E^2-field uncertainty inside TSL (see below ConvF).
- *NORM(f)x,y,z = NORMx,y,z* frequency_response* (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- *DCPx,y,z:* DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- PAR: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics.
- *Ax,y,z; Bx,y,z; Cx,y,z;VRx,y,z:*A,B,C are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- *ConvF and Boundary Effect Parameters:* Assessed in flat phantom using E-field (or Temperature Transfer Standard for f≤800MHz) and inside waveguide using analytical field distributions based on power measurements for f >800MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty valued are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORMx,y,z* ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from±50MHz to±100MHz.
- *Spherical isotropy (3D deviation from isotropy):* in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- *Sensor Offset:* The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- *Connector Angle:* The angle is assessed using the information gained by determining the *NORMx* (no uncertainty required).

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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3805

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (*k*=2)
Norm(μV/(V/m)^2)[A]	0.49	0.63	0.45	±10.0%
DCP(mV)[B]	101.4	97.7	101.4	

Modulation Calibration Parameters

UID	Communication System Name		A dB	B dB√μV	C	D dB	VR mV	Unc[E] (*k*=2)
0	CW	X	0.0	0.0	1.0	0.00	169.0	±2.5%
		Y	0.0	0.0	1.0		189.9	
		Z	0.0	0.0	1.0		155.5	

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

[A] The uncertainties of Norm X, Y, Z do not affect the E^2-field uncertainty inside TSL (see Page 4).
[B] Numerical linearization parameter: uncertainty not required.
[E] Uncertainly is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3805

Calibration Parameter Determined in Head Tissue Simulating Media

f [MHz][C]	Relative Permittivity [F]	Conductivity (S/m) [F]	ConvF X	ConvF Y	ConvF Z	Alpha[G]	Depth[G] (mm)	Unct. (k=2)
750	41.9	0.89	9.66	9.66	9.66	0.14	1.30	±12.7%
835	41.5	0.90	9.26	9.26	9.26	0.13	1.43	±12.7%
1750	40.1	1.37	8.16	8.16	8.16	0.23	1.09	±12.7%
1900	40.0	1.40	7.85	7.85	7.85	0.24	1.04	±12.7%
2000	40.0	1.40	7.83	7.83	7.83	0.22	1.13	±12.7%
2300	39.5	1.67	7.66	7.66	7.66	0.40	0.87	±12.7%
2450	39.2	1.80	7.42	7.42	7.42	0.36	0.94	±12.7%
2600	39.0	1.96	7.17	7.17	7.17	0.39	0.97	±12.7%
3300	38.2	2.71	7.01	7.01	7.01	0.47	0.90	±13.9%
3500	37.9	2.91	6.87	6.87	6.87	0.45	1.02	±13.9%
3700	37.7	3.12	6.65	6.65	6.65	0.35	1.25	±13.9%
3900	37.5	3.32	6.60	6.60	6.60	0.40	1.25	±13.9%
4100	37.2	3.53	6.54	6.54	6.54	0.40	1.15	±13.9%
4200	37.1	3.63	6.45	6.45	6.45	0.35	1.35	±13.9%
4400	36.9	3.84	6.36	6.36	6.36	0.40	1.25	±13.9%
4600	36.7	4.04	6.26	6.26	6.26	0.40	1.30	±13.9%
4800	36.4	4.25	6.20	6.20	6.20	0.40	1.38	±13.9%
4950	36.3	4.40	5.95	5.95	5.95	0.40	1.40	±13.9%
5250	35.9	4.71	5.38	5.38	5.38	0.40	1.50	±13.9%
5600	35.5	5.07	4.75	4.75	4.75	0.50	1.30	±13.9%
5750	35.4	5.22	4.88	4.88	4.88	0.45	1.40	±13.9%

[C] Frequency validity above 300 MHz of ±100MHz only applies for DASY v4.4 and higher (Page 2), else it is restricted to ±50MHz. The uncertainty is the RSS of ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

[F] At frequency up to 6 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ±10% if liquid compensation formula is applied to measured SAR values. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

[G] Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for the frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

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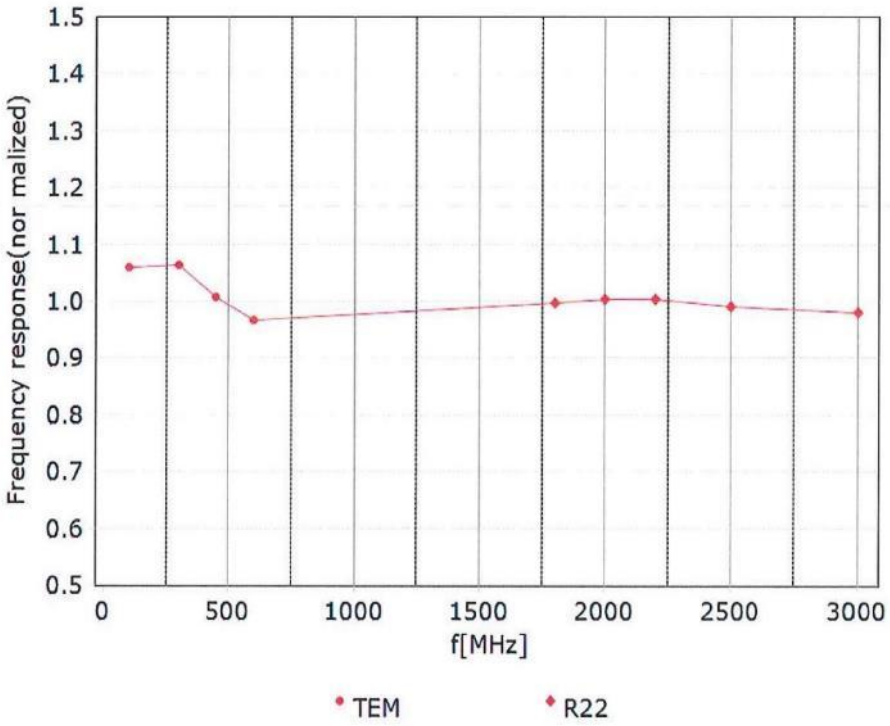
Frequency Response of E-Field
(TEM-Cell: ifi110 EXX, Waveguide: R22)



Uncertainty of Frequency Response of E-field: ±7.4% (*k*=2)

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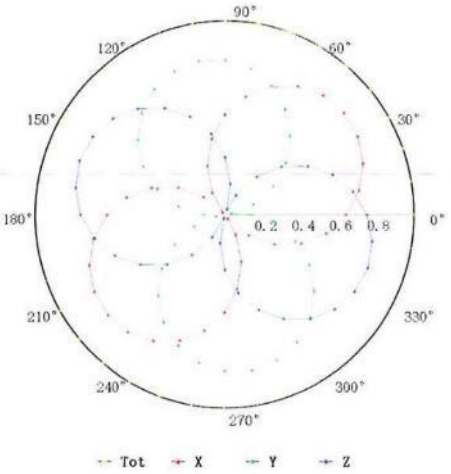
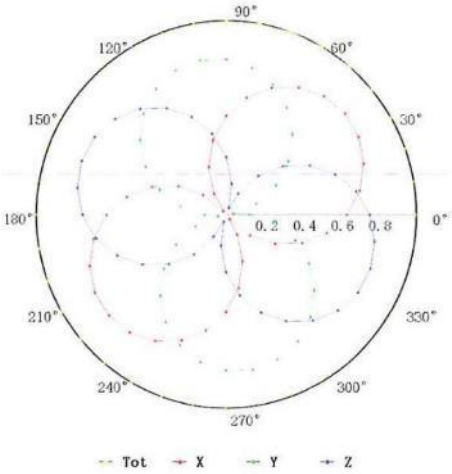
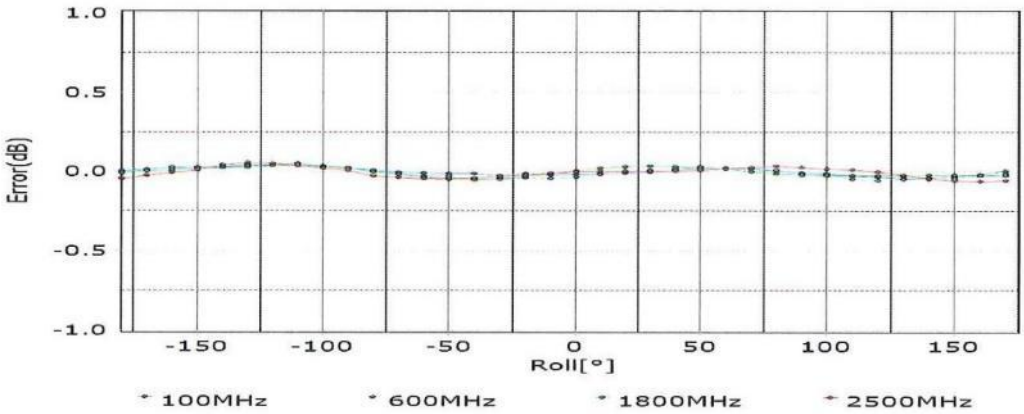
Receiving Pattern (Φ), θ=0°

f=600 MHz, TEM



f=1800 MHz, R22





Uncertainty of Axial Isotropy Assessment: ±1.2% (*k*=2)

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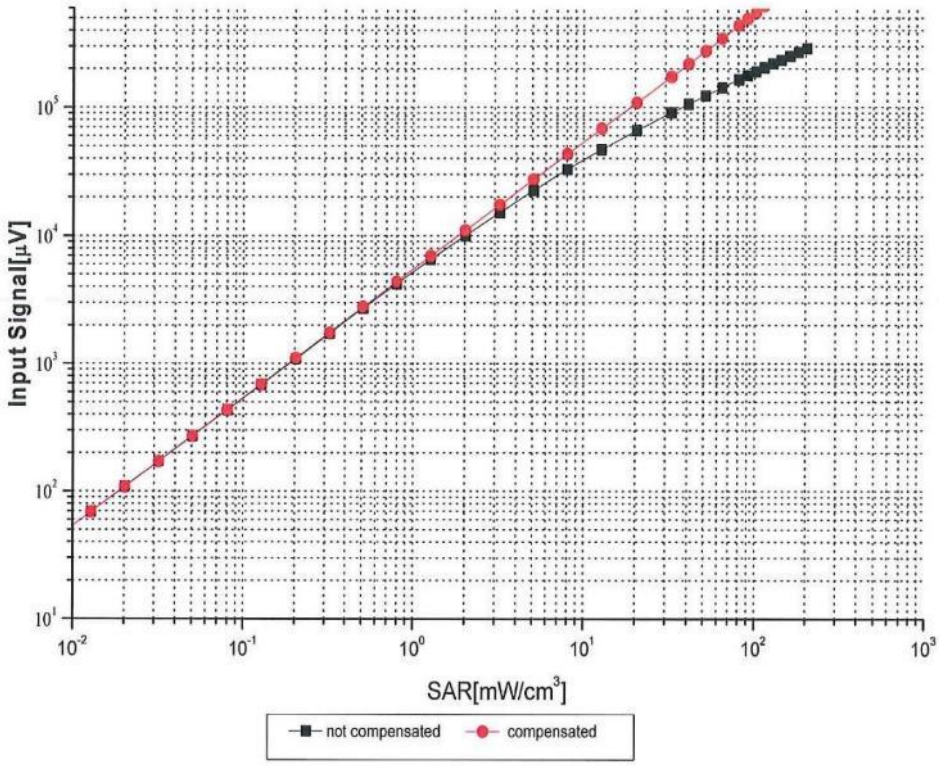
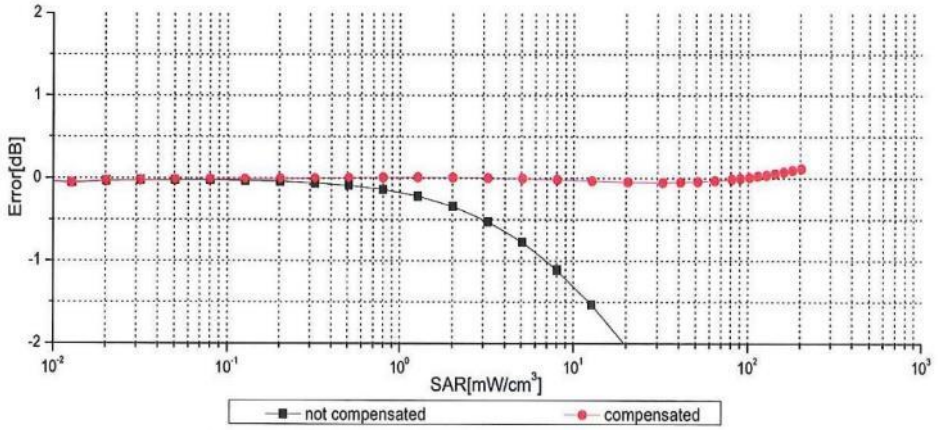
Dynamic Range f(SAR$_{head}$)
(TEM cell, f = 900 MHz)





Uncertainty of Linearity Assessment: ±0.9% (*k*=2)

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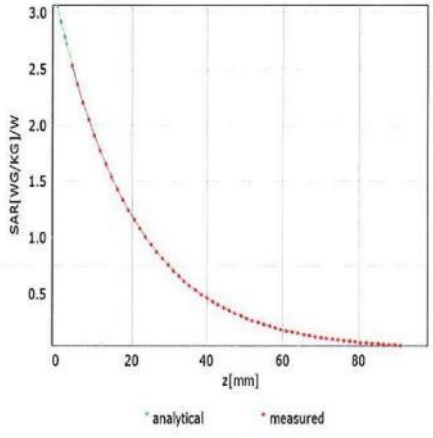
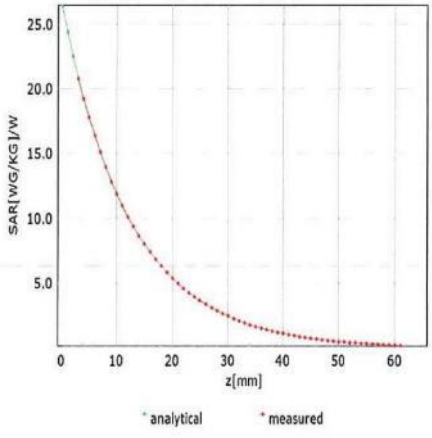
Conversion Factor Assessment

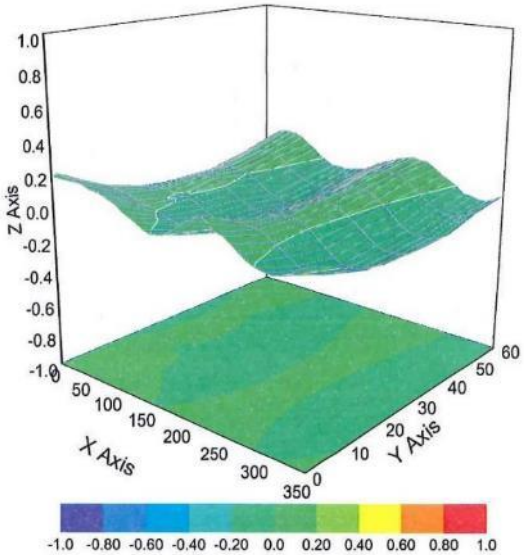
f=750 MHz,WGLS R9(H_convF)



f=1750 MHz,WGLS R22(H_convF)



Deviation from Isotropy in Liquid



Uncertainty of Spherical Isotropy Assessment: ±3.2% (*k*=2)

In Collaboration with
s p e a g
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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3805

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	127.3
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disable
Probe Overall Length	337mm
Probe Body Diameter	10mm
Tip Length	9mm
Tip Diameter	2.5mm
Probe Tip to Sensor X Calibration Point	1mm
Probe Tip to Sensor Y Calibration Point	1mm
Probe Tip to Sensor Z Calibration Point	1mm
Recommended Measurement Distance from Surface	1.4mm

APPENDIX D: PHOTOGRAPHS

1. SAR measurement System
2. Photographs of Tissue Simulate Liquid
3. Photographs of EUT test position
4. EUT Constructional Details

1. SAR measurement System

2. Photographs of Tissue Simulate Liquid

Photo 1: Tissue Simulant Liquid for Head 2450	N/A

3. Photographs of EUT test position

Photo 2: Front side(0mm)	Photo 3: Rear side(0mm)

4. EUT Constructional Details

Photo 4: Photo View	Photo 5: Photo View
Photo 6: Photo View	**Photo 7: Photo View**

.....The End of Test Report.....