

SAR TEST REPORT

Reference No.	:	WTD25D12335501W
FCC ID	:	2ALET-FC2801
Applicant	:	myFirst Tech Asia Pte. Ltd.
Address	:	8 Admiralty Street, #06-03 Admirax, Singapore 757438
Manufacturer	:	myFirst Tech Asia Pte. Ltd.
Address	:	8 Admiralty Street, #06-03 Admirax, Singapore 757438
Factory	:	Shenzhen Shamolang Tech co.,Ltd
Address	:	8 Admiralty Street, #06-03 Admirax, Singapore 757438
Product	:	MyFirst Insta Lux
Model(s).....	:	FC2801
Standards	:	FCC 47 CFR Part2(2.1093) IEEE Std. C95.1-2019 IEC/IEEE 62209-1528:2020
Date of Receipt sample	:	2025-12-17
Date of Test	:	2025-12-17 to 2025-12-22
Date of Issue	:	2025-12-25
Test Result	:	Pass

Remarks:

The results shown in this test report refer only to the sample(s) tested, this test report cannot be reproduced, except in full, without prior written permission of the company. The report would be invalid without specific stamp of test institute and the signatures of compiler and approver.

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TEST REPORT

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3 Revision History

Test Report No.	Date of Receipt Sample	Date of Test	Date of Issue	Purpose	Comment	Approved
WTD25D12335501W	2025-12-17	2025-12-17 to 2025-12-22	2025-12-25	Original	-	Valid

4 General Information

4.1 General Description of E.U.T.

Product:	MyFirst Insta Lux
Model(s):	FC2801
Model Description:	N/A
Test Sample No.:	1-1/1
Wi-Fi Specification:	2.4G-802.11b/g/n HT20/ n HT40
Hardware Version:	V1.0
Software Version:	V3.0.31

4.2 Details of E.U.T.

Operation Frequency:	802.11b/g/n HT20: 2412-2462MHz 802.11n HT40: 2422-2452MHz
Max. RF output power:	17.86dBm
Max.SAR:	0.223W/kg 1g Body Tissue
Type of Modulation:	DSSS, OFDM
Antenna installation	PCB Antenna
Antenna Gain:	2.47dBi

Note:

#: The antenna gain is provided by the applicant, and the applicant should be responsible for its authenticity, WALTEK lab has not verified the authenticity of its information.

Ratings:	DC 5V from USB-C DC 7.4V from Battery
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4.3 Test Facility

The test facility has a test site registered with the following organizations:

ISED CAB identifier: CN0013. Test Firm Registration No.: 7760A.

Waltek Testing Group Co., Ltd. Has been registered and fully described in a report filed with the Industry Canada. The acceptance letter from the Industry Canada is maintained in our files. Registration number 7760A, October 15, 2016.

FCC Designation No.: CN1201. Test Firm Registration No.: 523476.

Waltek Testing Group Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Registration number 523476, September 10, 2019.

5 Summary of Test Results

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

Frequency Band	Body-worn (0mm Gap)	SAR _{1g} Limit (W/kg)
	Maximum SAR _{1g} (W/kg)	
2.4G Wi-Fi	0.223	1.6

Remark:

The device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2.1093 and IEEE Std C95.1: 2019, and had been tested in accordance with the measurement methods and procedure specified in KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02.

6 Equipment Used during Test

6.1 Equipment List

Name of Equipment	Manufacturer	Type/Model	Serial Number	Calibration Date	Calibration Due
6 AXIS ROBOT	KUKA	KR6 R900 SIXX	502635	N/A	N/A
SATIMO Test Software	MVG	OPENSAR	OPENSAR V_4_02_27	N/A	N/A
PHANTOM TABLE	MVG	N/A	SAR_1215_01	N/A	N/A
SAM PHANTOM	MVG	SAM118	SN 11/15 SAM118	N/A	N/A
MultiMeter	Keithley	MiltiMeter 2000	4073942	2025-02-25	2026-02-24
S-Parameter Network Analyzer	Agilent	8753E	JP38160684	2025-09-14	2026-09-13
Universal Radio Communication Tester	ROHDE&SCHWARZ	CMU200	114798	2025-07-04	2026-07-03
Wideband Radio Communication Tester	ROHDE&SCHWARZ	CMW500	127818	2025-04-19	2026-04-18
E-Field Probe	MVG	SSE2	2523-EPGO-417	2025-07-25	2026-07-24
DIPOLE 2450	MVG	SID2450	SN 09/15 DIP 2G450-363	2023-08-08	2026-08-07
Limesar Dielectric Probe	MVG	SCLMP	SN 11/15 OCPG 69	2025-02-24	2026-02-23
Power Amplifier	BONN	BLWA 0830 -160/100/40D	128740	2025-07-04	2026-07-03
Signal Generator	R&S	SMB100A	105942	2025-07-04	2026-07-03
Power Meter	R&S	NRP2	102031	2025-07-04	2026-07-03
Power Meter	R&S	NRVD	102284	2025-07-04	2026-07-03
USB Wideband Power Sensor	Malaysia Keysight	U2021XA	MY54340009	2025-07-04	2026-07-03
USB Wideband Power Sensor	Malaysia Keysight	U2021XA	MY54340010	2025-07-04	2026-07-03

7 SAR Introduction

7.1 Introduction

This measurement report shows compliance of the EUT with IEEE Std. C95.1-2019 and FCC 47 CFR Part2 (2.1093). The test procedures, as described in IEC/IEEE 62209-1528:2020 Standard for 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)

7.2 SAR Definition

- SAR : Specific Absorption Rate
- The SAR characterizes the absorption of energy by a quantity of tissue
- This is related to an increase of the temperature of these tissues during a time period.

$$DAS = \frac{d}{dt} \left(\frac{dW}{dm} \right) = \frac{d}{dt} \left(\frac{dW}{\rho dV} \right)$$

$$DAS = \frac{\sigma E^2}{\rho}$$

$$DAS = c_h \left. \frac{dT}{dt} \right|_{t=0}$$

SAR definition

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

- SAR : Specific Absorption Rate

- σ : Liquid conductivity

$$\circ \epsilon_r = \epsilon' - j\epsilon'' \text{ (complex permittivity of liquid)}$$

$$\circ \sigma = \frac{\epsilon'' \omega}{\epsilon_0}$$

- ρ : Liquid density

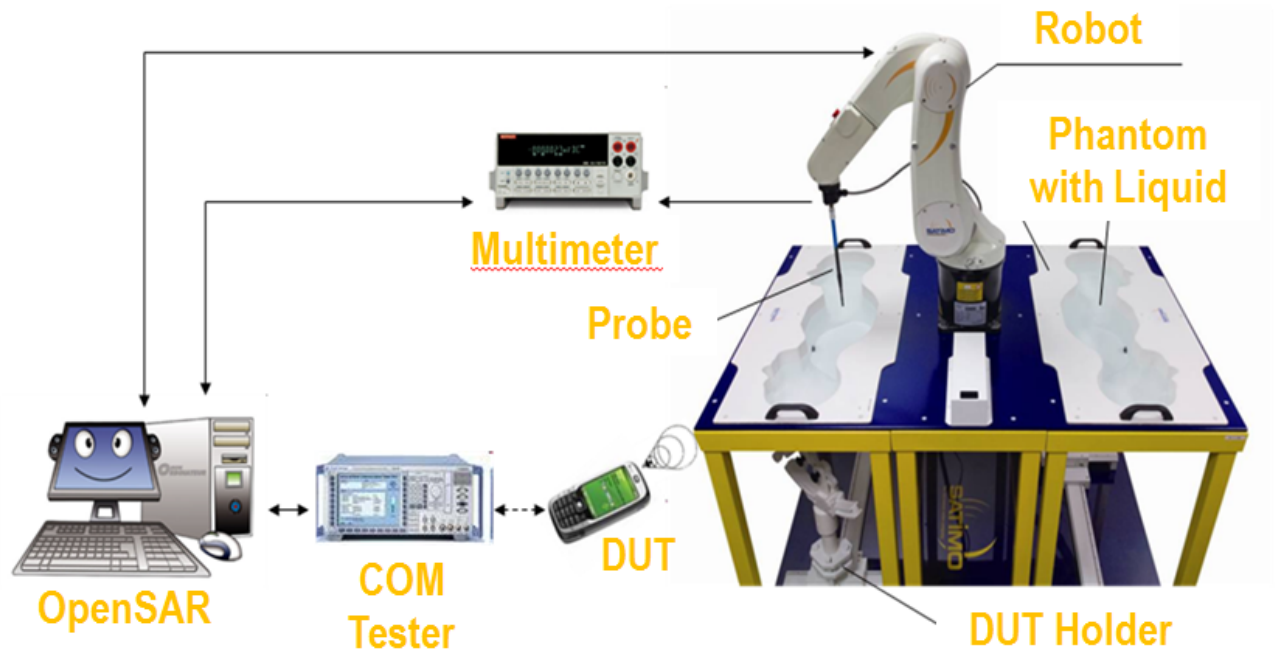
$$\circ \rho = 1000 \text{ g/L} = 1000 \text{ Kg/m}^3$$

where:

σ = conductivity of the tissue (S/m)
 ρ = mass density of the tissue (kg/m³)
 E = rms electric field strength (V/m)

8 SAR Measurement Setup

SAR bench sub-systems



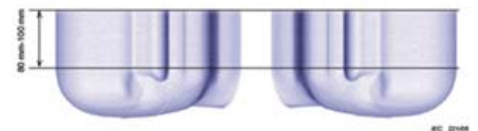
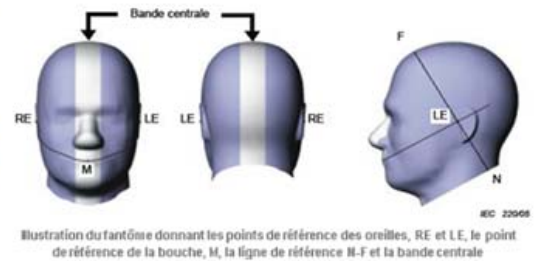
Scanning System (robot)

- ✎ It must be able to scan all the volume of the phantom to evaluate the tridimensional distribution of SAR.
- ✎ Must be able to set the probe orthogonal of the surface of the phantom ($\pm 30^\circ$).
- ✎ Detects stresses on the probe and stop itself if necessary to keep the integrity of the probe.

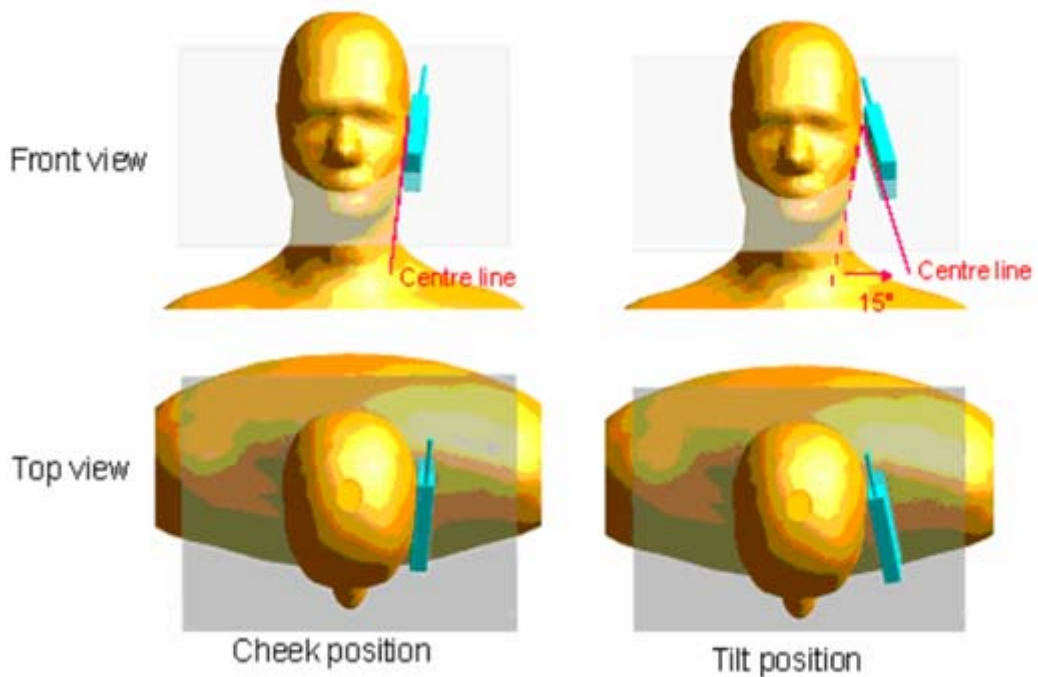


SAM Phantom (Specific Anthropomorphic Mannequin)

- ▶ The probe scanning of the E-Field is done in the 2 half of the normalized head.
- ▶ The normalized shape of the phantom corresponds to the dimensions of 90% of an adult head size.
- ▶ The materials for the phantom should not affect the radiation of the device under test (DUT)
 - Permittivity < 5
- ▶ The head is filled with tissue simulating liquid.
- ▶ The hand holding the DUT does not have to be modeled.



Bi-section sagittale du fantôme avec périmètre étendu (montrée sur le côté comme lors des essais de DAS de l'appareil)



The OPENSAR system for performing compliance tests consist of the following items:

1. A standard high precision 6-axis robot (KUKA) with controller and software.
2. KUKA Control Panel (KCP).
3. 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.
4. The functions of the PC plug-in card are to perform the time critical task such as signal filtering, surveillance of the robot operation fast movement interrupts.
5. A computer operating Windows 7.
6. OPENSAR software.
7. Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.
8. The SAM phantom enabling testing left-hand right-hand and body usage.
9. The Position device for handheld EUT.
10. Tissue simulating liquid mixed according to the given recipes (see Application Note).
11. System validation dipoles to validate the proper functioning of the system.

Data Evaluation

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

Probe Parameters	- Sensitivity	Norm _i
	- Conversion factor	ConvFi
	- Diode compression point Dcpi	
Device Parameter	- Frequency	f
	- Crest factor	cf
Media Parametrs	- Conductivity	σ
	- Density	ρ

These parameters must be set correctly in the software. They can either be found in the component documents or be imported into the software from the configuration files issued for the OPENSAR components.

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

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

Where V_i = Compensated signal of channel i ($i = x, y, z$)

U_i = 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:

$$\text{E-field probes: } E_i = \sqrt{\frac{V_i}{\text{Norm}_i \cdot \text{ConvF}}}$$

$$\text{H-field probes: } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

Where V_i = Compensated signal of channel i ($i = x, y, z$)

Norm_i = Sensor sensitivity of channel i ($i = x, y, z$)
μV/(V/m)² for E0field Probes

ConvF = Sensitivity enhancement in solution

a_{ij} = Sensor sensitivity factors for H-field probes

$$\begin{aligned}
 f &= \text{Carrier frequency (GHz)} \\
 E_i &= \text{Electric field strength of channel } i \text{ in V/m} \\
 H_i &= \text{Magnetic field strength of channel } i \text{ in A/m}
 \end{aligned}$$

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

$$E_{\text{tot}} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{\text{tot}}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

$$\begin{aligned}
 \text{where } SAR &= \text{local specific absorption rate in mW/g} \\
 E_{\text{tot}} &= \text{total field strength in V/m} \\
 \sigma &= \text{conductivity in [mho/m] or [siemens/m]} \\
 \rho &= \text{equivalent tissue density in g/cm}^3
 \end{aligned}$$

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 as a free space field.

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

$$\begin{aligned}
 \text{where } P_{\text{pwe}} &= \text{Equivalent power density of a plane wave in mW/cm}^2 \\
 E_{\text{tot}} &= \text{total electric field strength in V/m} \\
 H_{\text{tot}} &= \text{total magnetic field strength in A/m}
 \end{aligned}$$

SAR Evaluation – Peak Spatial - Average

The procedure for assessing the peak spatial-average SAR value consists of the following steps

- **Power Reference Measurement**

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

- **Area Scan**

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a finer measurement around the hot spot. The sophisticated interpolation routines implemented in OPENSAR software can find the maximum locations even in relatively coarse grids. The scan area is defined by an editable grid. This grid is anchored at the grid reference point of the selected section in the phantom.

When the area scan's property sheet is brought-up, grid was at to 15 mm by 15 mm and can be edited by a user.

- **Zoom Scan**

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default zoom scan measures 5 x 5 x 7 points within a cube whose base faces are centered around the maximum found in a preceding area scan job within the same procedure. If the preceding Area Scan job indicates more than one maximum, the number of Zoom Scans has to be enlarged accordingly (The default number inserted is 1).

- **Power Drift measurement**

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have OPENSAR software stop the measurements if this limit is exceeded.

SAR Evaluation – Peak SAR

The procedure for spatial peak SAR evaluation has been implemented according to the IEEE1528 standard. It can be conducted for 1 g and 10 g. The OPENSAR system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- boundary correction
- peak search for averaged SAR

During a maximum search, global and local maximum searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard's method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

Extrapolation

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation. They are used in the Cube Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the fourth order least square polynomial method for extrapolation. For a grid using 5x5x7 measurement points with 5mm resolution amounting to 343 measurement points, the uncertainty of the extrapolation routines is less than 1% for 1 g and 10 g cubes.

Definition of Reference Points

Ear Reference Point

Figure 6.2 shows the front, back and side views of the SAM Phantom. The point “M” is the reference point for the center of the mouth, “LE” is the left ear reference point (ERP), and “RE” is the right ERP. The ERPs are 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 6.1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front) is perpendicular to the reference plane and passing through the RE (or LE) is called the Reference Pivoting Line (see Figure 6.1). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [5].

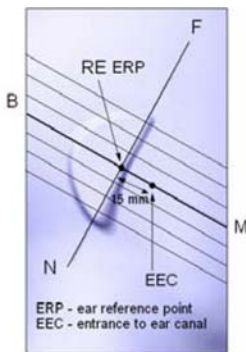


Figure 6.1 Close-up side view of ERP's



Figure 6.2 Front, back and side view of SAM

Device Reference Points

Two imaginary lines on the device need to be established: the vertical centerline and the horizontal line. The test device is placed in a normal operating position with the “test device reference point” located along the “vertical centerline” on the front of the device aligned to the “ear reference point” (See Fig. 6.3). The “test device reference point” is then located at the same level as the center of the ear reference point. The test device is positioned so that the “vertical centerline” is bisecting the front surface of the device at its top and bottom edges, positioning the “ear reference point” on the outer surface of both the left and right head phantoms on the ear reference point [5].

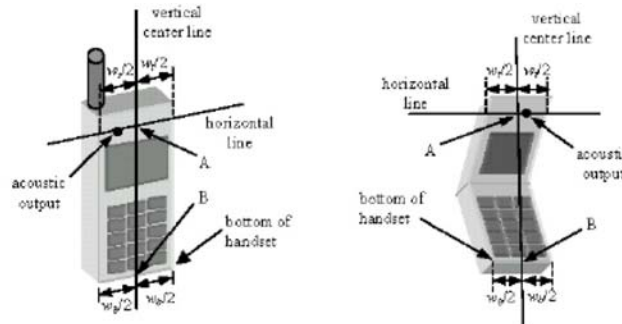


Figure 6.3 Handset Vertical Center & Horizontal Line Reference Points

Test Configuration – Positioning for Cheek / Touch

1. Position the device close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure below), such that the plane defined by the vertical center line and the horizontal line of the device is approximately parallel to the sagittal plane of the phantom

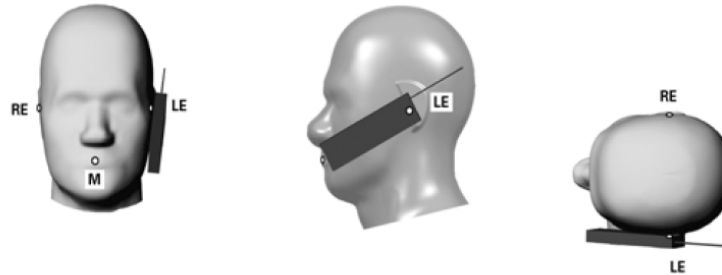


Figure 7.1 Front, Side and Top View of Cheek/Touch Position

2. Translate the device towards the phantom along the line passing through RE and LE until the device touches the ear.
3. While maintaining the device in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane).
4. Rotate the device around the vertical centerline until the device (horizontal line) is symmetrical with respect to the line NF.
5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE and maintaining the device contact with the ear, rotate the device about the line NF until any point on the device is in contact with a phantom point below the ear (cheek). See Figure below.

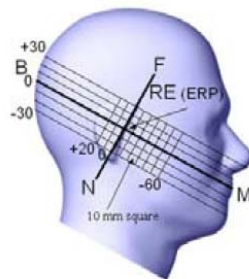


Figure 7.2 Side view w/ relevant markings

Test Configuration – Positioning for Ear / 15° Tilt

With the test device aligned in the Cheek/Touch Position”:

1. While maintaining the orientation of the device, retract the device parallel to the reference plane far enough to enable a rotation of the device by 15 degrees.
2. Rotate the device around the horizontal line by 15 degrees.
3. While maintaining the orientation of the device, move the device parallel to the reference plane until any part of the device touches the head. (In this position, point A is located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact is at any location other than the pinna, the angle of the device shall be reduced. The tilted position is obtained when any part of the device is in contact with the ear as well as a second part of the device is in contact with the head (see Figure below).

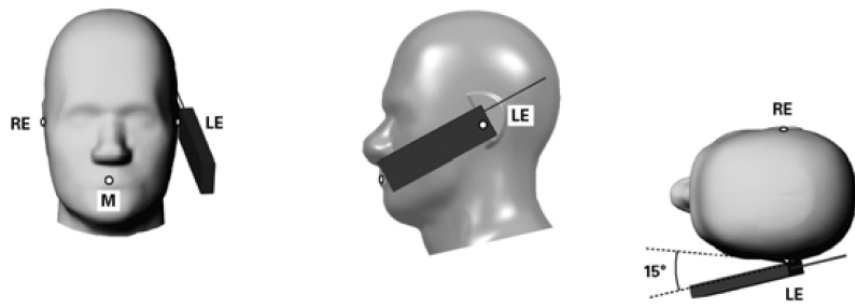
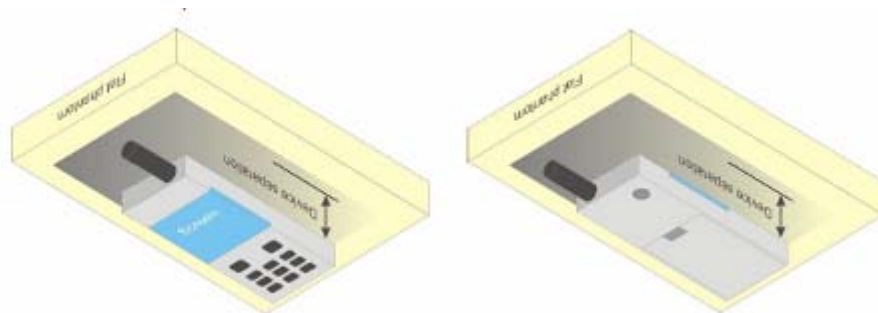


Figure 7.3 Front, Side and Top View of Ear/15° Tilt Position

Test Position – Body Configurations

Body Worn Position

- (a) To position the device parallel to the phantom surface with either keypad up or down.
- (b) To adjust the device parallel to the flat phantom.
- (c) To adjust the distance between the device surface and the flat phantom to 1.0 cm or holster surface and the flat phantom to 0 cm.



9 Exposure limit

In order for users to be aware of the body-worn operating requirements for meeting RF exposure compliance, operating instructions and cautions statements are included in the user's manual.

Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Controlled Environment

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). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 8.1 Human Exposure Limits

	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Professional Population (W/kg) or (mW/g)
SPATIAL PEAK SAR ¹ Brain	1.60	8.00
SPATIAL AVERAGE SAR ² Whole Body	0.08	0.40
SPATIAL PEAK SAR ³ Hands, Feet, Ankles, Wrists	4.00	20.00

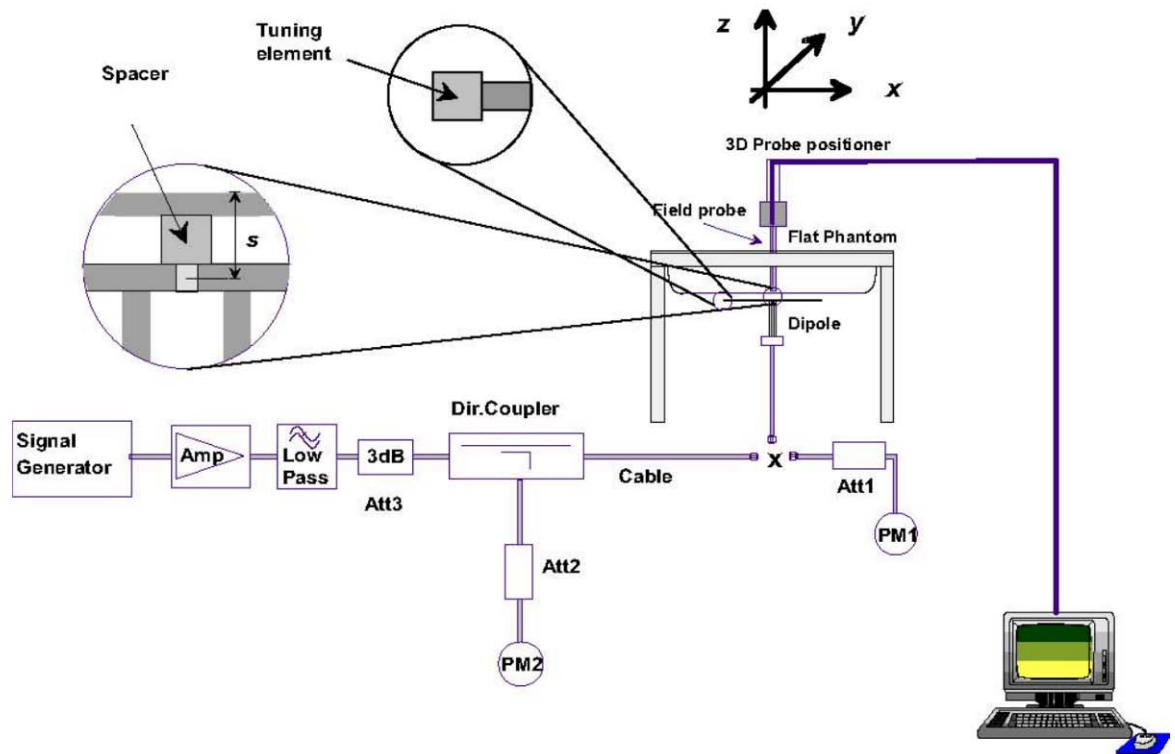
¹ The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

² The Spatial Average value of the SAR averaged over the whole body.

³ 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.

10 System and liquid validation

10.1 System validation



Verification Setup Block Diagram



Dipole Antenna Setup Photo

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

1. Signal Generator
2. Amplifier
3. Directional Coupler
4. Power Meter
5. Calibrated Dipole

The output power on dipole port must be calibrated to 30 dBm (1000 mW) before dipole is connected.

Numerical reference SAR values (W/kg) for reference dipole and flat phantom

Frequency (MHz)	1g SAR	10g SAR	Local SAR at surface(above feed-point)	Local SAR at surface(y = 2 cm offset from feedpoint)
300	3.02	2.04	4.40	2.10
450	4.92	3.28	7.20	3.20
750	8.49	5.55	12.6	4.59
835	9.56	6.22	14.1	4.90
900	10.9	6.99	16.4	5.40
1450	29.0	16.0	50.2	6.50
1800	38.4	20.1	69.5	6.80
1900	39.7	20.5	72.1	6.60
2000	41.1	21.1	74.6	6.50
2450	52.4	24.0	104	7.70
2600	55.3	24.6	113	8.29
3000	63.8	25.7	140	9.50

Table 1: system validation (1g)

Measurement Date	Frequency (MHz)	Liquid Type (head/body)	1W Target SAR1g (W/kg)	Measured SAR1g (W/kg)	1W Normalized SAR1g (W/kg)	Desired Tolerance (%)	Actual Tolerance (%)
2025-12-22	2450	head	54.33	5.529	55.29	±10	1.77

Remark: system check input power: 100mW.

10.2 liquid validation

The dielectric parameters were checked prior to assessment using the HP85070C dielectric probe kit. The dielectric parameters measured are reported in each correspondent section.

KDB 865664 recommended Tissue Dielectric Parameters

The head and body tissue parameters given in this below table should be used to measure the SAR of transmitters operating in 100 MHz to 6 GHz frequency range. The tissue dielectric parameters of the tissue medium at the test frequency should be within the tolerance required in this document. The dielectric parameters should be linearly interpolated between the closest pair of target frequencies to determine the applicable dielectric parameters corresponding to the device test frequency.

The head tissue dielectric parameters recommended by IEEE Std 1528-2013 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in 1528 are derived from tissue dielectric parameters computed from the 4-Cole-Cole equations described above and extrapolated according to the head parameters specified in 1528.

Target Frequency	Head Tissue		Body Tissue	
MHz	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
750	41.9	0.89	55.5	0.96
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800-2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
2600	39.0	1.96	52.5	2.16
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness Power drifts in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Table 2: Recommended Dielectric Performance of Tissue

Recommended Dielectric Performance of Tissue						
Head/Body						
Ingredients (% by weight)	Frequency (MHz)					
	750	835	1800	1900	2450	2600
Water	40.52	41.45	55.2	54.9	62.7	54.8
Salt (NaCl)	1.61	1.45	0.3	0.18	0.5	0.1
Sugar	57.67	56.0	0.0	0.0	0.0	0.0
HEC	0.1	1.0	0.0	0.0	0.0	0.0
Bactericide	0.1	0.1	0.0	0.0	0.0	0.0
Triton x-100	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	44.5	44.92	0.0	45.1
Dielectric	40.93	42.54	40.0	39.9	39.8	39.0
Conductivity	0.87	0.91	1.40	1.42	1.88	1.96

Table 3: Dielectric Performance of Head Tissue Simulating Liquid

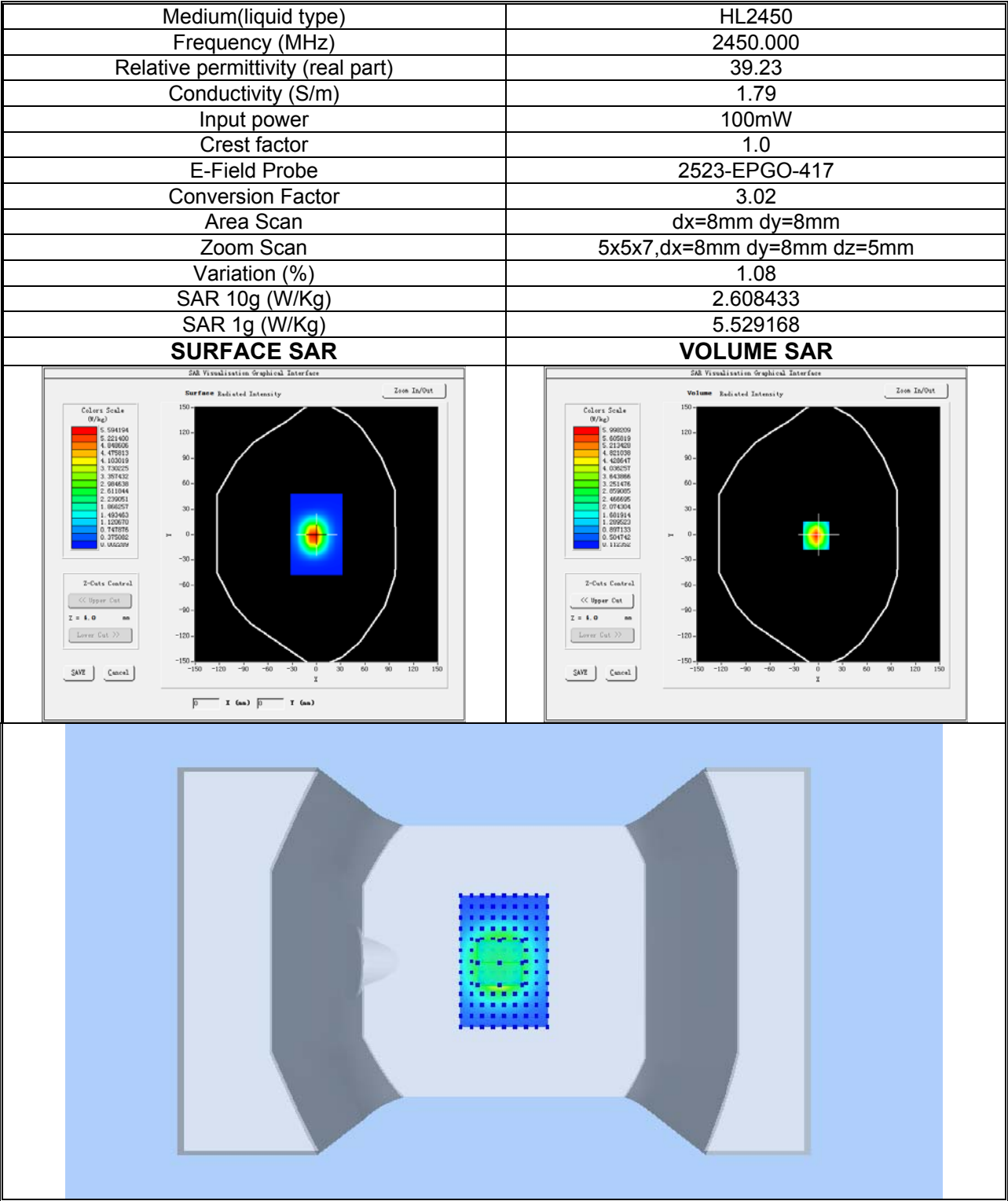
Temperature: 24.6°C , Relative humidity: 41.2%				
Frequency(MHz)	Measured Date	Description	Dielectric Parameters	
			ϵ_r	$\sigma(s/m)$
2450	2025-12-22	Target Value $\pm 5\%$ window	39.20 37.24— 41.16	1.80 1.71 — 1.89
		Measurement Value	39.23	1.79

System Verification Plots

Product Description: Dipole

Model: SID2450

Test Date: 2025-12-22



11 Type a Measurement Uncertainty

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience and specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in Table below :

Uncertainty Distribution	Normal	Rectangle	Triangular	U Shape
Multi-plying Factor(a)	$1/k(b)$	$1 / \sqrt{3}$	$1 / \sqrt{6}$	$1 / \sqrt{2}$

(a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity

(b) k is the coverage factor

Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type -sum- by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %.

The COMOSAR Uncertainty Budget is show in below table:

UNCERTAINTY FOR SYSTEM PERFORMANCE CHECK								
a	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System								
Probe calibration	5.8	N	1	1	1	5.80	5.80	∞
Axial Isotropy	3.5	R	$\sqrt{3}$	$(1_{Cp})^{1/2}$	$(1_{Cp})^{1/2}$	1.43	1.43	∞
Hemispherical Isotropy	5.9	R	$\sqrt{3}$	$(Cp)^{1/2}$	$(Cp)^{1/2}$	2.41	2.41	∞
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	4.7	R	$\sqrt{3}$	1	1	2.71	2.71	∞
System detection limits	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Modulation response	0.00	N	1	1	1	0.00	0.00	∞
Readout Electronics	0.50	N	1	1	1	0.50	0.50	∞
Reponse Time	0.0	R	$\sqrt{3}$	1	1	0.00	0.00	∞
Integration Time	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
RF ambient Conditions - Noise	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to Phantom Shell	1.40	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Extrapolation, interpolation and integration Algorithms for Max. SAR Evaluation	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	∞
Dipole								
Deviation of experimental source from numerical source	4.00	N	1	1	1	4.00	4.00	∞
Input power and SAR drift measurement	5.00	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Dipole axis to liquid Distance	2.00	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Phantom and Tissue Parameters								
Phantom Uncertainty (Shape and thickness tolerances)	4.00	R	$\sqrt{3}$	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviation (in permittivity and conductivity)	2.00	N	1	1	1	2.00	1.68	∞
Liquid conductivity (temperature uncertainty)	2.50	N	1	0.78	0.71	1.95	1.77	∞
Liquid conductivity - measurement uncertainty	4.00	N	1	0.23	0.26	0.92	1.04	M
Liquid permittivity (temperature uncertainty)	2.50	N	1	0.78	0.71	1.95	1.77	∞
Liquid permittivity - measurement uncertainty	5.00	N	1	0.23	0.26	1.15	1.30	M
Combined Standard Uncertainty		RSS				10.21	10.12	
Expanded Uncertainty (95% Confidence interval)		k				19.91	19.73	

UNCERTAINTY EVALUATION FOR HANDSET SAR TEST								
a	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System								
Probe calibration	5.8	N	1	1	1	5.80	5.80	∞
Axial Isotropy	3.5	R	$\sqrt{3}$	$(1_{Cp})^{\wedge 1/2}$	$(1_{Cp})^{\wedge 1/2}$	1.43	1.43	∞
Hemispherical Isotropy	5.9	R	$\sqrt{3}$	$(Cp)^{\wedge 1/2}$	$(Cp)^{\wedge 1/2}$	2.41	2.41	∞
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	4.7	R	$\sqrt{3}$	1	1	2.71	2.71	∞
System detection limits	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Modulation response	3.00	N	1	1	1	3.00	3.00	∞
Readout Electronics	0.50	N	1	1	1	0.50	0.50	∞
Reponse Time	0.0	R	$\sqrt{3}$	1	1	0.00	0.00	∞
Integration Time	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
RF ambient Conditions - Noise	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to Phantom Shell	1.40	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Extrapolation, interpolation and integration Algoritms for Max. SAR Evaluation	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	∞
Test sample Related								
Test sample positioning	2.60	N	1	1	1	2.60	2.60	N-1
Device Holder Uncertainty	3.00	N	1	1	1	3.00	3.00	N-1
Output power Variation - SAR drift measurement	5.00	R	$\sqrt{3}$	1	1	2.89	2.89	∞
SAR scaling	2.00	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Phantom and Tissue Parameters								
Phantom Uncertainty (Shape and thickness tolerances)	4.00	R	$\sqrt{3}$	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviation (in permittivity and conductivity)	2.00	N	1	1	1	2.00	1.68	∞
Liquid conductivity (temperature uncertainty)	2.50	N	1	0.78	0.71	1.95	1.77	∞
Liquid conductivity - measurement uncertainty	4.00	N	1	0.23	0.26	0.92	1.04	M
Liquid permittivity (temperature uncertainty)	2.50	N	1	0.78	0.71	1.95	1.77	∞
Liquid permittivity - measurement uncertainty	5.00	N	1	0.23	0.26	1.15	1.30	M
Combined Standard Uncertainty		RSS				10.63	10.54	
Expanded Uncertainty (95% Confidence interval)		k				20.73	20.56	

12 Output Power Verification

12.1 Test Condition

1. Conducted Measurement
EUT was set for low, mid, high channel with modulated mode and highest RF output power.
The base station simulator was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is $\pm 1.5\text{dB}$.
3. Environmental Conditions

Temperature	24.8°C
Relative Humidity	46%
Atmospheric Pressure	1011mbar

12.2 Test Result

2.4G Wi-Fi Measurement Result

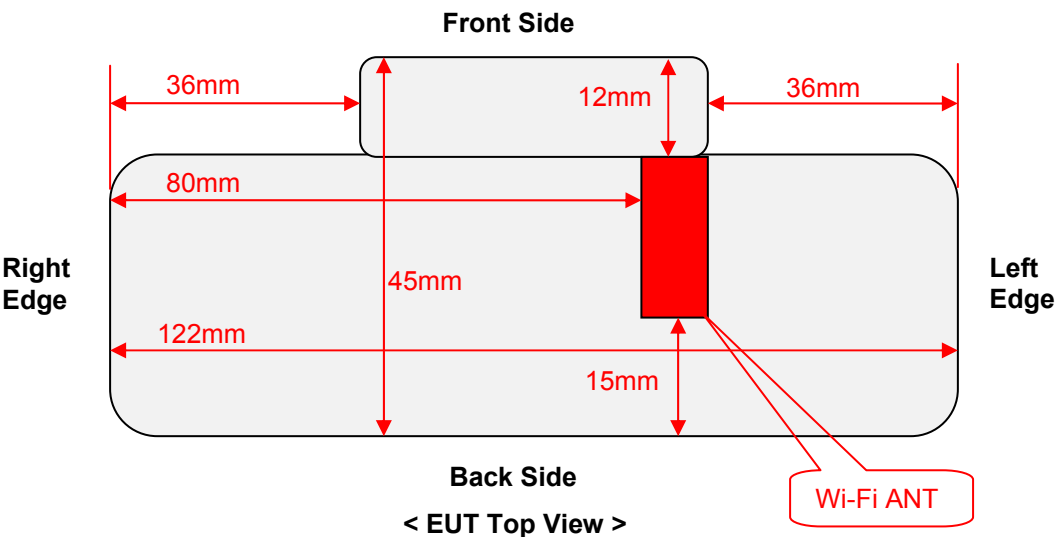
Channel number	Frequency (MHz)	Output Power(dBm)	Tune up limited(dBm)
TX 11b	2412	17.86	17.0 $\pm$ 1
	2437	14.67	14.0 $\pm$ 1
	2462	14.53	14.0 $\pm$ 1
TX 11g	2412	13.01	13.0 $\pm$ 1
	2437	13.92	13.0 $\pm$ 1
	2462	13.88	13.0 $\pm$ 1
TX 11n HT20	2412	11.75	11.0 $\pm$ 1
	2437	12.66	12.0 $\pm$ 1
	2462	12.67	12.0 $\pm$ 1
TX 11n HT40	2422	11.55	11.0 $\pm$ 1
	2437	12.09	12.0 $\pm$ 1
	2452	11.88	11.0 $\pm$ 1

Note:

The 2.4G Wi-Fi Output Power was provided by Dongguan Lepont Testing Service Co., Ltd.

13 Exposure Conditions Consideration

13.1 EUT antenna location



13.2 Test position consideration

Distance of EUT antenna-to-edge/surface(mm),						
Antennas	Back Side	Front Side	Left Edge	Right Edge	Top Edge	Bottom Edge
Wi-Fi	15	12	36	80	<25	>25
Test distance:0mm						
Antennas	Back Side	Front Side	Left Edge	Right Edge	Top Edge	Bottom Edge
Wi-Fi	YES	YES	NO	NO	YES	NO

Note:

1. Body SAR mode assessments are required.
2. Per KDB 447498 D01v06, for handsets the test separation distance is determined by the smallest distance between the outer surface of the device and the user, which is 0 mm for body SAR.

14 SAR Test Results

14.1 Test Condition

1. SAR Measurement
The distance between the EUT and the antenna of the emulator is more than 50 cm and the output power radiated from the emulator antenna is at least 30 dB less than the output power of EUT.
2. Environmental Conditions

Temperature	24.6°C
Relative Humidity	41.2%
Atmospheric Pressure	1011mbar

14.2 Generally Test Procedures

1. Establish communication link between EUT and base station emulation by air link.
2. Place the EUT in the selected test position. (Cheek, tilt or flat)
3. Perform SAR testing at middle or highest output power channel under the selected test mode. If the measured 1-g SAR is ≤ 0.8 W/kg, then testing for the other channel will not be performed.
4. When SAR is < 0.8 W/kg, no repeated SAR measurement is required

14.3 SAR Summary Test Result

Table 4: SAR Values of 2.4G Wi-Fi

Test Positions		Channel	Test Mode	Power(dBm)		SAR 1g(W/Kg), Limit(1.6W/kg)			Plot No.
		MHz		Maximum Turn-up Power (dBm)	Measured output power (dBm)	Scaling Factor	Measured SAR 1g(W/kg)	Scaled SAR 1g(W/kg)	
Body (0mm Separation)	Front Side	2412	802.11b	18	17.86	1.033	0.078	0.081	--
	Back Side	2412	802.11b	18	17.86	1.033	0.082	0.085	--
	Top Edge	2412	802.11b	18	17.86	1.033	0.216	0.223	1

Measurement variability consideration

According to KDB 865664 D01v01r04 section 2.8.1, repeated measurements are required following the procedures as below:

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

When the original highest measured SAR is $\geq 0.80\text{ W/kg}$, repeat that measurement once.

Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is $\geq 1.45\text{ W/kg}$ (~ 10% from the 1-g SAR limit).

Perform a third repeated measurement only if the original, first or second repeated measurement is $\geq 1.5\text{ W/kg}$ and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

No Repeated SAR.**Simultaneous Transmission SAR Analysis.**

Note: No Simultaneous Transmission SAR.

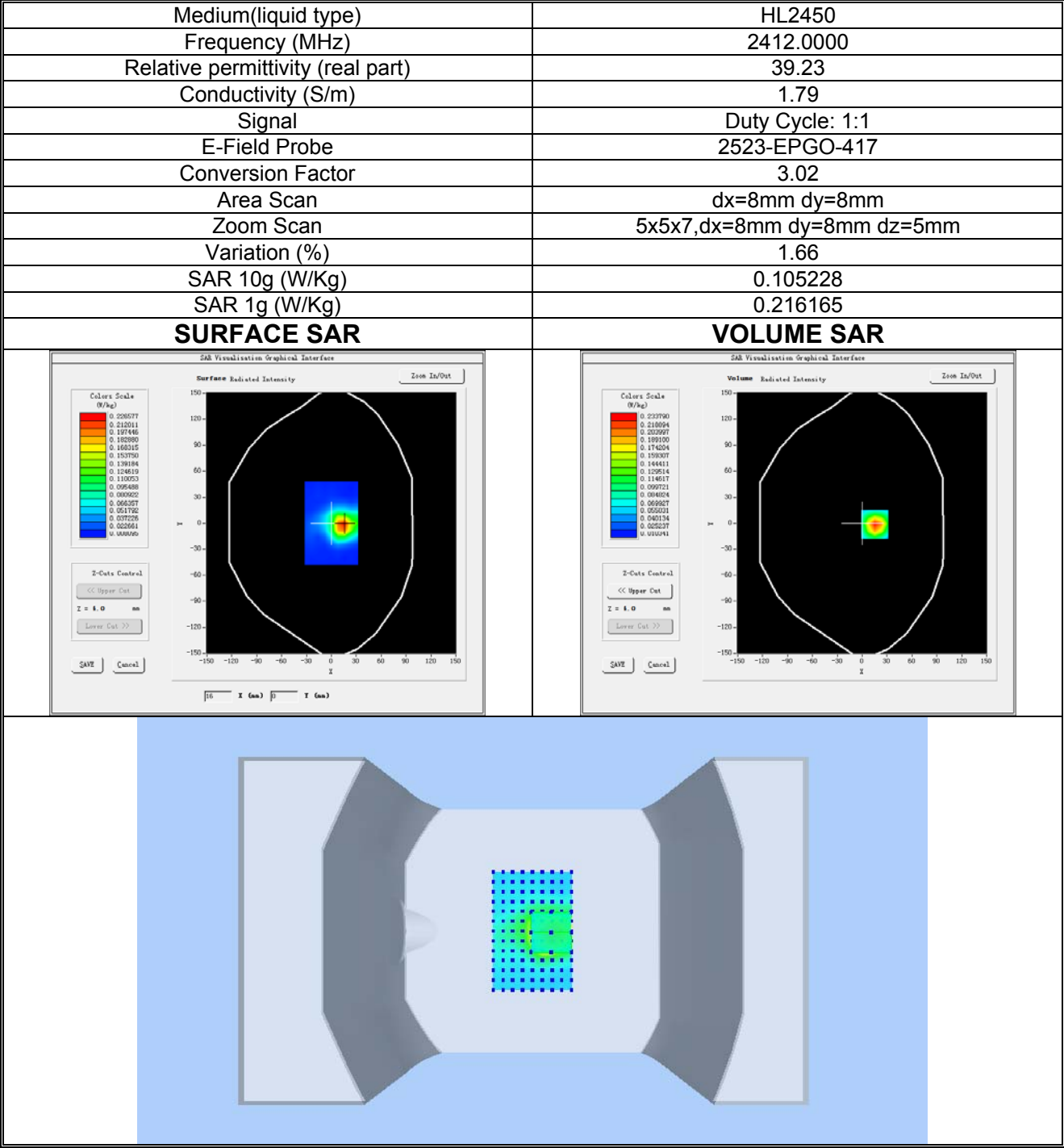
15 SAR Measurement Reference

15.1 References

1. **FCC 47 CFR Part 2 “Frequency Allocations and Radio Treaty Matters; General Rules and Regulations”**
2. **IEEE Std. C95.1-2019, “IEEE Standards for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz”**
3. **IEC/IEEE 62209-1528:2020, 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 4 MHz to 10 GHz)**
4. **FCC KDB447498 D01v06, “RF exposure requirements for mobile and portable device equipment authorizations”**
5. **FCC KDB865664 D01 v01r04, “SAR measurement procedures for devices operating between 100 MHz to 6 GHz”**
6. **FCC KDB865664 D02 v01r02, “RF Exposure Compliance Reporting and Documentation Considerations ”**
7. **FCC KDB248227 D01 v02r02, “SAR measurements for devices incorporating IEEE 802.11 wireless transmitters”**

15.2Maximum SAR measurement Plots

Plot 1: 2.4G Wi-Fi, Low channel (Body SAR, Top Edge)
Product Description: MyFirst Insta Lux
Test Date: 2025-12-22



16 Calibration Reports-Probe and Dipole



COMOSAR E-Field Probe Calibration Report

Ref : ACR.304.21.27.BES.B

WALTEK TESTING GROUP CO., LTD
NO,77, HOUJIE SECTION, GUANTAI ROAD, HOUJIE TOWN
DONGGUAN GUANGDONG 518105, CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: 2523-EPGO-417

Calibrated at MVG

Z.I. de la pointe du diable

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

Calibration date: 07/25/2025



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Summary:

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

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.304.21.27.BES.B

	Name	Function	Date	Signature
Prepared by :	Cyrille ONNEE	Measurement Responsible	7/25/2025	
Checked & approved by:	Jérôme Luc	Technical Manager	7/25/2025	
Authorized by:	Yann Toutain	Laboratory Director	7/25/2025	

Yann
Toutain ID

Signature
numérique de
Yann Toutain ID
Date : 2025.07.25
09:52:33 +01'00'

	Customer Name
Distribution :	WALTEK TESTING GROUP CO., LTD

Issue	Name	Date	Modifications
A	Cyrille ONNEE	7/25/2025	Initial release



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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.304.21.27.BES.B

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	2523-EPGO-417
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.232 MΩ Dipole 2: R2=0.224 MΩ Dipole 3: R3=0.209 MΩ

2 PRODUCT DESCRIPTION**2.1 GENERAL INFORMATION**

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



Figure 1 – MVG COMOSAR Dosimetric E field Probe

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

3 MEASUREMENT METHOD

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

3.1 SENSITIVITY

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

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3.2 LINEARITY

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

3.3 ISOTROPY

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

3.4 BOUNDARY EFFECT

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

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

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

where

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

The measured worst case boundary effect SARuncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).



4 MEASUREMENT UNCERTAINTY

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

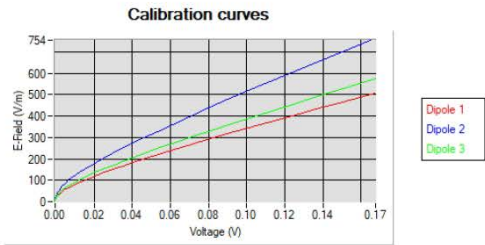
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

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

5.1 CALIBRATION IN AIR

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



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

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

where

Vi=voltage readings on the 3 channels of the probe
DCPi=diode compression point given below for the 3 channels of the probe
Normi=dipole sensitivity given below for the 3 channels of the probe



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.304.21.27.BES.B

Normx dipole 1 ($\mu\text{V}/(\text{V}/\text{m})^2$)	Normy dipole 2 ($\mu\text{V}/(\text{V}/\text{m})^2$)	Normz dipole 3 ($\mu\text{V}/(\text{V}/\text{m})^2$)
1.63	0.74	1.32

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
110	109	107

5.2 CALIBRATION IN LIQUID

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

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

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

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

where

σ =the conductivity of the liquid

ρ =the volumetric density of the liquid

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

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

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

where

c =the specific heat for the liquid

dT/dt =the temperature rises over the time

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

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

where

a =the larger cross-sectional of the waveguide

b =the smaller cross-sectional of the waveguide

δ =the skin depth for the liquid in the waveguide

P_W =the power delivered to the liquid

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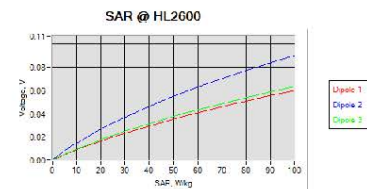
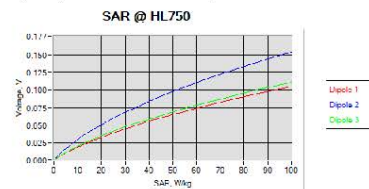
COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.304.21.27.BES.B

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

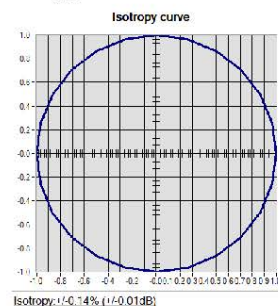
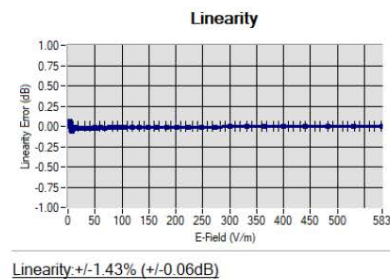
Liquid	Frequency (MHz*)	ConvF
HL750	750	2.61
HL850	835	2.47
HL900	900	2.65
HL1800	1800	2.64
HL1900	1900	2.82
HL2000	2000	3.01
HL2300	2300	2.91
HL2450	2450	3.02
HL2600	2600	2.74

(*) Frequency validity is ± 50 MHz below 600 MHz, ± 100 MHz from 600 MHz to 6 GHz and ± 700 MHz above 6 GHz



6 VERIFICATION RESULTS

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



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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.304.21.27.BES.B

7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2024	08/2027
Network Analyzer	Agilent 8753ES	MY40003210	10/2023	10/2027
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2025	07/2028
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2025	03/2028
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2024	06/2027
Power Meter	Keysight U2000A	SN: MY62340002	10/2025	10/2028
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Fluoroptic Thermometer	LumaSense Luxtron 812	94264	09/2022	09/2025
Coaxial cell	MVG	SN 32/16 COAXCELL_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG2_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G600_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

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Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG14_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_7G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2024	06/2027



SAR Reference Dipole Calibration Report

Ref : ACR.335.14.23.BES.A

WALTEK TESTING GROUP CO., LTD.
NO.77, HOUIE SECTION, GUANTAI ROAD, HOUIE TOWN,
DONGGUAN, GUANGDONG 518105, CHINA
MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 2450MHZ
SERIAL NO.: SN 09/15 DIP 2G450-363

Calibrated at MVG
Z.I. de la pointe du diable
Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE

Calibration date: 08/08/2023



Accreditations #2-6789 and #2-6814

Scope available on www.cofrac.fr

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Summary:

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

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Jérôme Luc	Technical Manager	8/8/2023	<i>JS</i>
<i>Checked by :</i>	Jérôme Luc	Technical Manager	8/8/2023	<i>JS</i>
<i>Approved by :</i>	Yann Toutain	Laboratory Director	8/8/2023	<i>Yann TOUTAIN</i> 2023.08.08 10:06:13 +01'00'

	<i>Customer Name</i>
<i>Distribution :</i>	Waltek Testing Group Co., Ltd.

<i>Issue</i>	<i>Name</i>	<i>Date</i>	<i>Modifications</i>
A	Jérôme Luc	8/8/2023	Initial release

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

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1 INTRODUCTION

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

2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 2450 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID2450
Serial Number	SN 09/15 DIP 2G450-363
Product Condition (new / used)	New

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

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



Figure 1 – MVG COMOSAR Validation Dipole

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4 MEASUREMENT METHOD

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

4.1 RETURN LOSS REQUIREMENTS

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

4.2 MECHANICAL REQUIREMENTS

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

5 MEASUREMENT UNCERTAINTY

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

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.10 LIN

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
3 - 300	0.05 mm
300 - 450	0.11 mm

5.3 VALIDATION MEASUREMENT

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

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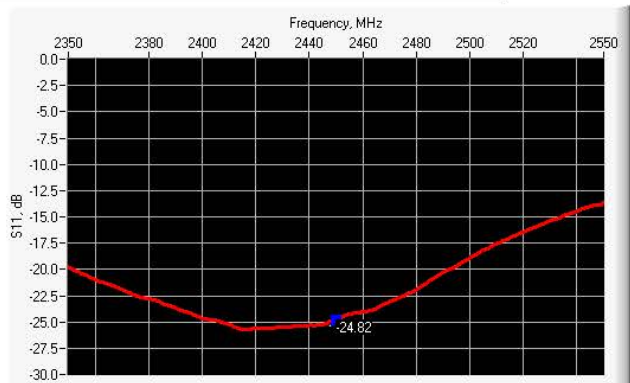
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

Scan Volume	Expanded Uncertainty
1 g	20.3 % (SAR)
10 g	20.1 % (SAR)

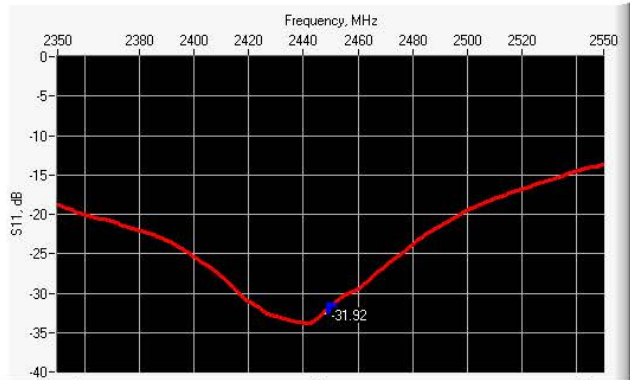
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
2450	-24.82	-20	44.3 Ω + 0.2 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
2450	-31.92	-20	47.5 Ω - 0.4 jΩ



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	420.0 ±1 %.		250.0 ±1 %.		6.35 ±1 %.	
450	290.0 ±1 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.		39.5 ±1 %.		3.6 ±1 %.	
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.	51.48	30.4 ±1 %.	30.42	3.6 ±1 %.	3.61
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3300	-		-		-	
3500	37.0 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3900	-		-		-	
4200	-		-		-	
4600	-		-		-	
4900	-		-		-	

7 VALIDATION MEASUREMENT

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

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Ref: ACR.335.14.23.BES.A

7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r')		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 $\pm$ 10 %		0.87 $\pm$ 10 %	
450	43.5 $\pm$ 10 %		0.87 $\pm$ 10 %	
750	41.9 $\pm$ 10 %		0.89 $\pm$ 10 %	
835	41.5 $\pm$ 10 %		0.90 $\pm$ 10 %	
900	41.5 $\pm$ 10 %		0.97 $\pm$ 10 %	
1450	40.5 $\pm$ 10 %		1.20 $\pm$ 10 %	
1500	40.4 $\pm$ 10 %		1.23 $\pm$ 10 %	
1640	40.2 $\pm$ 10 %		1.31 $\pm$ 10 %	
1750	40.1 $\pm$ 10 %		1.37 $\pm$ 10 %	
1800	40.0 $\pm$ 10 %		1.40 $\pm$ 10 %	
1900	40.0 $\pm$ 10 %		1.40 $\pm$ 10 %	
1950	40.0 $\pm$ 10 %		1.40 $\pm$ 10 %	
2000	40.0 $\pm$ 10 %		1.40 $\pm$ 10 %	
2100	39.8 $\pm$ 10 %		1.49 $\pm$ 10 %	
2300	39.5 $\pm$ 10 %		1.67 $\pm$ 10 %	
2450	39.2 $\pm$ 10 %	38.5	1.80 $\pm$ 10 %	1.78
2600	39.0 $\pm$ 10 %		1.96 $\pm$ 10 %	
3000	38.5 $\pm$ 10 %		2.40 $\pm$ 10 %	
3300	38.2 $\pm$ 10 %		2.71 $\pm$ 10 %	
3500	37.9 $\pm$ 10 %		2.91 $\pm$ 10 %	
3700	37.7 $\pm$ 10 %		3.12 $\pm$ 10 %	
3900	37.5 $\pm$ 10 %		3.32 $\pm$ 10 %	
4200	37.1 $\pm$ 10 %		3.63 $\pm$ 10 %	
4600	36.7 $\pm$ 10 %		4.04 $\pm$ 10 %	
4900	36.3 $\pm$ 10 %		4.35 $\pm$ 10 %	

7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPG0333
Liquid	Head Liquid Values: ϵ_{ps} : 38.5 σ : 1.78
Distance between dipole center and liquid	15.0 mm
Area scan resolution	$dx=8mm/dy=8mm$
Zoon Scan Resolution	$dx=8mm/dy=8mm/dz=5mm$
Frequency	2450 MHz
Input power	20 dBm
Liquid Temperature	21 +/- 1 °C
Lab Temperature	21 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	
1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4	54.33 (5.43)	24	24.21 (2.42)
2600	55.3		24.6	
3000	63.8		25.7	
3300	-		-	
3500	67.1		25	
3700	67.4		24.2	
3900	-		-	
4200	-		-	
4600	-		-	
4900	-		-	

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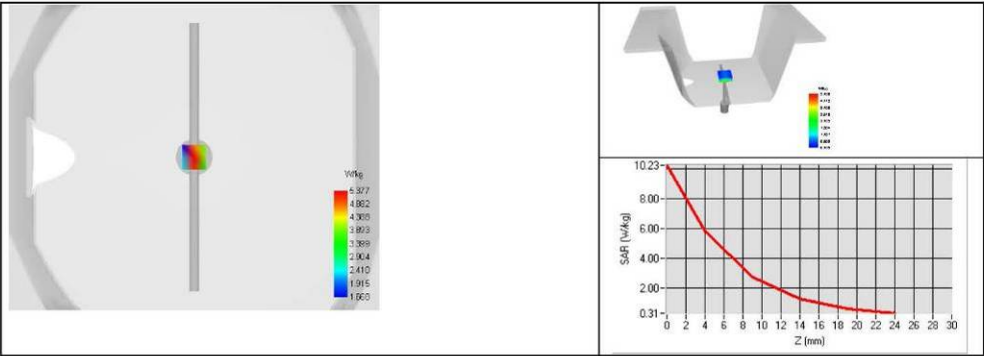
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Ref: ACR.335.14.23.BES.A

7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 $\pm$ 10 %		0.80 $\pm$ 10 %	
300	58.2 $\pm$ 10 %		0.92 $\pm$ 10 %	
450	56.7 $\pm$ 10 %		0.94 $\pm$ 10 %	
750	55.5 $\pm$ 10 %		0.96 $\pm$ 10 %	
835	55.2 $\pm$ 10 %		0.97 $\pm$ 10 %	
900	55.0 $\pm$ 10 %		1.05 $\pm$ 10 %	
915	55.0 $\pm$ 10 %		1.06 $\pm$ 10 %	
1450	54.0 $\pm$ 10 %		1.30 $\pm$ 10 %	
1610	53.8 $\pm$ 10 %		1.40 $\pm$ 10 %	
1800	53.3 $\pm$ 10 %		1.52 $\pm$ 10 %	
1900	53.3 $\pm$ 10 %		1.52 $\pm$ 10 %	
2000	53.3 $\pm$ 10 %		1.52 $\pm$ 10 %	
2100	53.2 $\pm$ 10 %		1.62 $\pm$ 10 %	
2300	52.9 $\pm$ 10 %		1.81 $\pm$ 10 %	
2450	52.7 $\pm$ 10 %	53.4	1.95 $\pm$ 10 %	1.90
2600	52.5 $\pm$ 10 %		2.16 $\pm$ 10 %	
3000	52.0 $\pm$ 10 %		2.73 $\pm$ 10 %	
3300	51.6 $\pm$ 10 %		3.08 $\pm$ 10 %	
3500	51.3 $\pm$ 10 %		3.31 $\pm$ 10 %	
3700	51.0 $\pm$ 10 %		3.55 $\pm$ 10 %	
3900	50.8 $\pm$ 10 %		3.78 $\pm$ 10 %	
4200	50.4 $\pm$ 10 %		4.13 $\pm$ 10 %	
4600	49.8 $\pm$ 10 %		4.60 $\pm$ 10 %	
4900	49.4 $\pm$ 10 %		4.95 $\pm$ 10 %	
5200	49.0 $\pm$ 10 %		5.30 $\pm$ 10 %	
5300	48.9 $\pm$ 10 %		5.42 $\pm$ 10 %	
5400	48.7 $\pm$ 10 %		5.53 $\pm$ 10 %	
5500	48.6 $\pm$ 10 %		5.65 $\pm$ 10 %	
5600	48.5 $\pm$ 10 %		5.77 $\pm$ 10 %	
5800	48.2 $\pm$ 10 %		6.00 $\pm$ 10 %	

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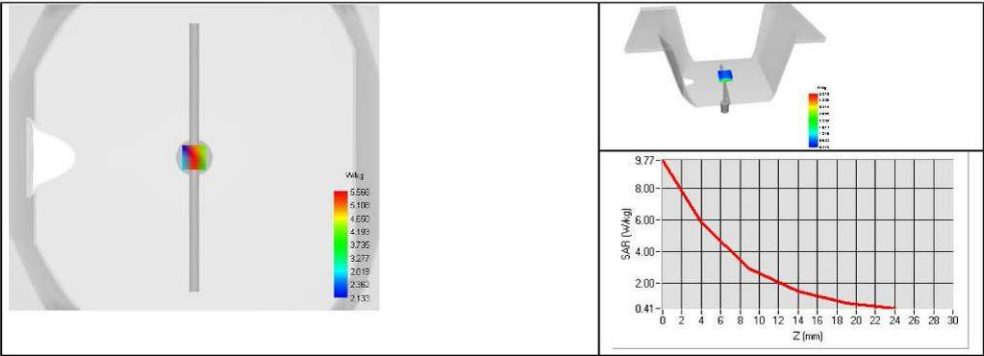
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPG0333
Liquid	Body Liquid Values: ϵ_{ps}' : 53.4 σ : 1.90
Distance between dipole center and liquid	15.0 mm
Area scan resolution	$dx=8mm/dy=8mm$
Zoon Scan Resolution	$dx=8mm/dy=8mm/dz=5mm$
Frequency	2450 MHz
Input power	20 dBm
Liquid Temperature	21 +/- 1 °C
Lab Temperature	21 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	1 g SAR (W/kg/W)	10 g SAR (W/kg/W)
	measured	measured
2450	53.64 (5.36)	24.43(2.44)





SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.335.14.23.BES.A

8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
SAM Phantom	MVG	SN-13/09-SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVM	100203	08/2021	08/2024
Network Analyzer	Agilent 8753ES	MY40003210	10/2022	10/2025
Network Analyzer - Calibration kit	Rhode & Schwarz ZV-Z235	101223	05/2022	05/2025
Network Analyzer - Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Calipers	Mitutoyo	SN 0009732	10/2022	10/2025
Reference Probe	MVG	SN 41/18 EPG0333	10/2022	10/2023
Multimeter	Keithley 2000	1160271	02/2023	02/2026
Signal Generator	Rhode & Schwarz SMB	106589	04/2022	04/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2024
Power Meter	Rhode & Schwarz NRVD	832839-056	11/2022	11/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature/Humidity Sensor	Testo 184 H1	44225320	06/2021	06/2024

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Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vJ

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Appendix A. Extended Calibration SAR Dipole

Referring to KDB865664 D01, if dipoles are verified in return loss ($<-20\text{dBm}$, within 20% of prior calibration), and in impedance (within 5 ohm of prior calibration), the annual calibration is not necessary and the calibration interval can be extended.

Justification of Extended Calibration SAR Dipole SID2450– serial no. SN 09/15 DIP 2G450-363

Head						
Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (johm)	Delta (johm)
2023-08-08	-24.82	/	44.3	/	0.2	/
2024-08-06	-24.64	4.23	45.7	1.4	0.4	0.2
2025-08-05	-24.48	8.14	46.1	1.8	0.5	0.3

Body						
Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (johm)	Delta (johm)
2023-08-08	-31.92	/	47.5	/	0.4	/
2024-08-06	-31.68	5.68	47.2	0.3	0.5	0.1
2025-08-05	-31.45	11.43	46.7	0.8	0.8	0.4

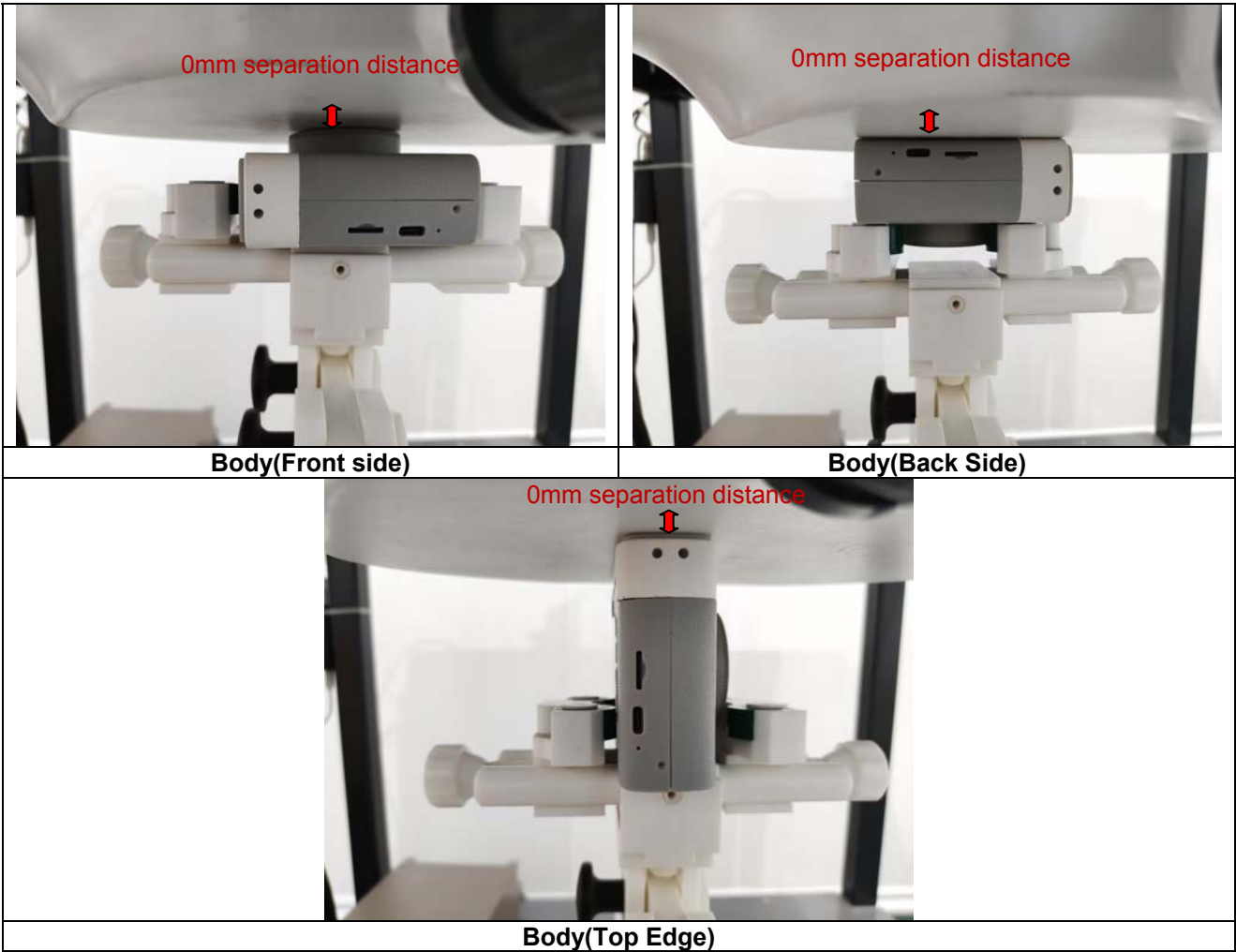
The Return-Loss is $<-20\text{dB}$, and within 20% of prior calibration; the impedance is within 5 ohm of prior calibration. Therefore the value result should support extended.

17 SAR System Photos



Liquid depth $\geq$ 15cm

18 Setup Photos



19 EUT Photos



Front side



Back side



Front side



Back side

=====End of Report=====