

FCC SAR Test Report

Applicant: reMarkable AS

EUT Description: reMarkable RM12A

Model: RM12A

Brand: reMarkable

FCC ID: 2AMK2-RM12AA

Standards: FCC 47CFR §2.1093

Date of Receipt: 2025/12/24

Date of Test: 2025/12/29

Date of Issue: 2026/01/04

TOWE. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

the results documented in this report apply only the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility assure that additional production units of the model are manufactured with identical electrical and mechanical components. All sample tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise. without written approval of TOWE, the test report shall not be reproduced except in full.



Jim Huang
Approved By:



Jack Li
Reviewed By:

Revision History

Rev.	Issue Date	Description	Revised by
01	2026/01/04	Original	Jack Li

Table of Contents

1	Summary of Test Results	4
2	Guidance Applied	5
3	Lab Information	5
3.1	Testing Location	5
3.2	Test Facility / Accreditations	5
3.3	Ambient Condition	5
4	Client Information	5
4.1	Applicant	5
4.2	Manufacturer	5
5	Product Information	6
5.1	Antenna Locations	6
6	RF Exposure Limits	7
7	Introduction	8
7.1	SAR Definition	8
8	SAR Measurements System	9
8.1	The SAR Measurement Set-up	9
8.2	Measurement procedure	10
8.2.1	Power reference measurement	10
8.2.2	Area scan	10
8.2.3	Zoom Scan	11
8.2.4	Power Drift Measurement	11
9	Test Equipment list	12
10	SAR measurement variability	13
11	Description of Test Position	13
11.1	RF exposure conditions	13
12	System Verification	14
12.1	Tissue Verification	14
12.2	SAR System Check	15
12.2.1	System Check Result	15
12.2.2	Detailed System Check Result	15
13	Data Summary	16
13.1	SAR Measurement Result of WPT	16
14	Measurement Uncertainty	17
15	Calibration Certificate	18
16	Test Setup Photos	18
Appendix A: System Check Plots		18
Appendix B: SAR Test Plots		18
Appendix C: Calibration certificate		18
Appendix D: Test Setup Photos		18

1 Summary of Test Results

Band	Highest SAR(W/kg)
	Body 1g SAR 0mm
WPT 13.56MHz	0.10
Limit	1.6

2 Guidance Applied

FCC 47CFR §2.1093
ANSI/IEEE C95.1-1992
IEEE 1528-2013
IEC/IEEE 62209-1528:2020
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 616217 D04 SAR for laptop and tablets v01r02

3 Lab Information

3.1 Testing Location

These measurements tests were conducted at the Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. facility located at F401 and F101, Building E, Hongwei Industrial Zone, Liuxian 3rd Road, Bao'an District, Shenzhen, China. The measurement facility is compliant with the test site requirements specified in ANSI C63.4-2014
Tel.: +86-755-27212361
Contact Email: info@towewireless.com

3.2 Test Facility / Accreditations

A2LA (Certificate Number: 7088.01)

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 General requirements for the competence of testing and calibration laboratories. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).

FCC Designation No.: CN1353

Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. has been recognized as an accredited testing laboratory.
Designation Number: CN1353.

ISED CAB identifier: CN0152

Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. has been recognized by ISED as an accredited testing laboratory.
CAB identifier: CN0152
Company Number: 31000

3.3 Ambient Condition

Temperature: 18°C~25°C
Relative Humidity: 30%~75%

4 Client Information

4.1 Applicant

Applicant:	reMarkable AS
Address:	Fridtjof Nansens vei 12, 0369 Oslo, Norway

4.2 Manufacturer

Manufacturer:	reMarkable AS
Address:	Fridtjof Nansens vei 12, 0369 Oslo, Norway

5 Product Information

EUT Description:	reMarkable RM12A	
Model:	RM12A	
Brand:	reMarkable	
Hardware Version:	A	
Software Version:	3.25.0.140	
SN.:	RM12A005318000P	
Device Capabilities:		
Band	Frequency Range (MHz)	Modulation Type
WPT	13.56	ASK
Antenna Type	☐ External, ☒ Integrated	
Remark:		
1) The above EUT's information was declared by applicant, please refer to the specifications or user manual for more detailed description.		
2) Only WPT test data included in this report.		

5.1 Antenna Locations

Please see Appendix D.

6 RF Exposure Limits

Human Exposure	Uncontrolled Environment General Population (W/kg) or (mW/g)	Controlled Environment Occupational (W/kg) or (mW/g)
Spatial Peak SAR¹ (Brain/Trunk)	1.6	8.0
Spatial Average SAR² (Whole Body)	0.08	0.4
Spatial Peak SAR³ (Hands/Feet/Ankle/Wrist)	4.0	20.0

Note:

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.

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 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. The 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.

7 Introduction

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

7.1 SAR Definition

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

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

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

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

Where:

σ is the conductivity of the tissue material (S/m)

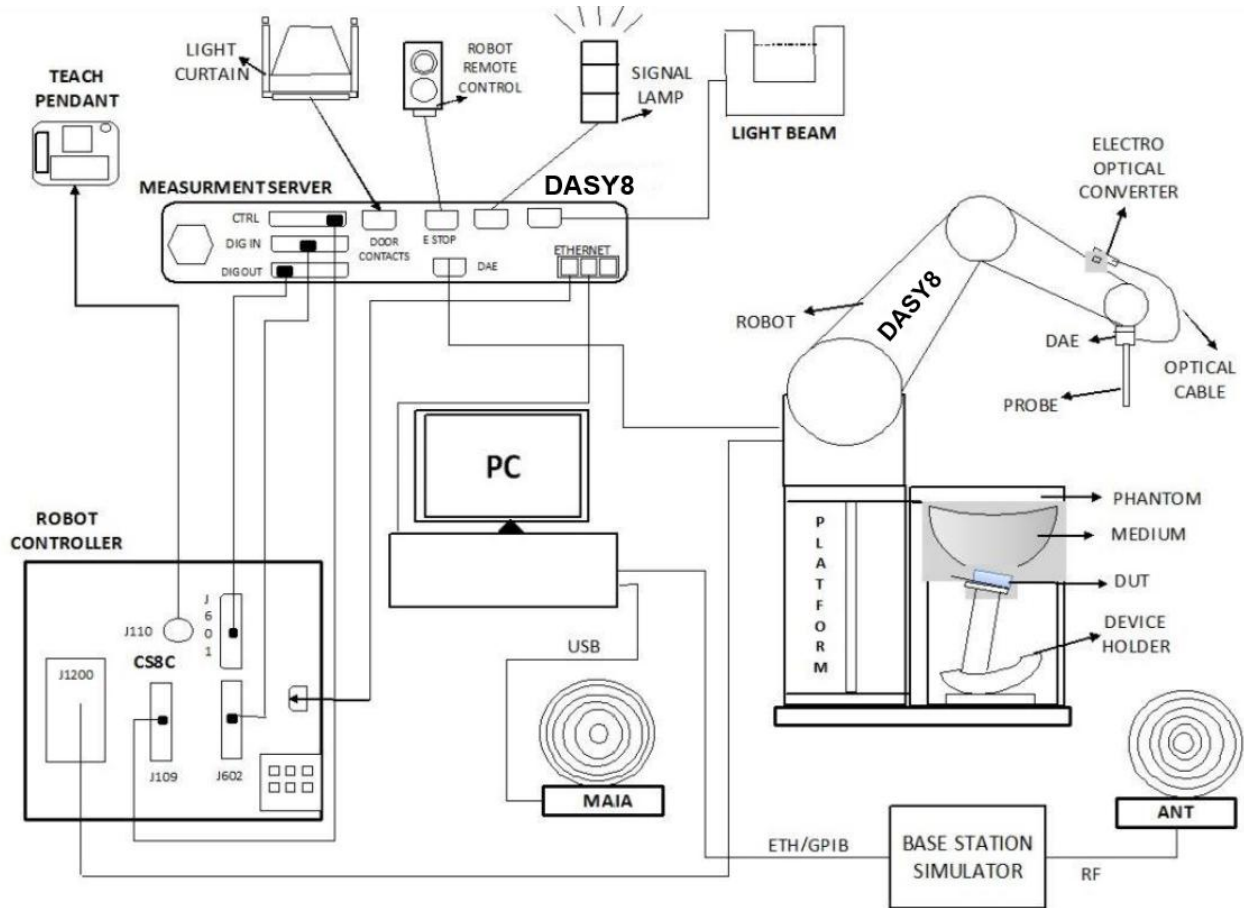
ρ is the mass density of the tissue material (kg/m³)

E is the RMS electrical field strength (V/m)

8 SAR Measurements System

8.1 The SAR Measurement Set-up

The DASY system used for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- 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 from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- 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.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Windows 11 and the DASY8 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

8.2 Measurement procedure

8.2.1 Power reference measurement

The Power Reference Measurement and Power Drift Measurement jobs are useful jobs for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

8.2.2 Area scan

Measurement procedures for evaluating SAR from wireless handsets typically start with a coarse measurement grid to determine the approximate location of the local peak SAR values. This is known as the area-scan procedure. In addition, identify the positions of any local maxima with SAR values within 2 dB of the maximum value, and that will not be within the zoom scan of other peaks. Additional zoom scans shall be measured for such peaks only when the primary peak is within 2 dB of the SAR compliance limit.

Area scan parameters SAR measurement as below.

Parameter	DUT transmit frequency being tested	
	$f \leq 3 \text{ GHz}$	$3 \text{ GHz} < f \leq 10 \text{ GHz}$
Maximum distance between the measured points (geometric centre of the sensors) and the inner phantom surface (z_{M1} in Figure 20 in mm)	5 ± 1	$\delta \ln(2)/2 \pm 0,5^a$
Maximum spacing between adjacent measured points in mm (see O.8.3.1) ^b	20, or half of the corresponding zoom scan length, whichever is smaller	$60/f$, or half of the corresponding zoom scan length, whichever is smaller
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20) ^c	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Tolerance in the probe angle	1°	1°
^a δ is the penetration depth for a plane-wave incident normally on a planar half-space. ^b See Clause O.8 on how Δx and Δy may be selected for individual area scan requirements. ^c The probe angle relative to the phantom surface normal is restricted due to the degradation in the measurement accuracy in fields with steep spatial gradients. The measurement accuracy decreases with increasing probe angle and increasing frequency. This is the reason for the tighter probe angle restriction at frequencies above 3 GHz.		

8.2.3 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 Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Zoom Scan parameters SAR measurement as below:

Parameter	DUT transmit frequency being tested	
	$f \leq 3 \text{ GHz}$	$3 \text{ GHz} < f \leq 10 \text{ GHz}$
Maximum distance between the closest measured points and the phantom surface (z_{M1} in Figure 20 and Table 3, in mm)	5	$\delta \ln(2)/2^a$
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20)	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Maximum spacing between measured points in the x - and y -directions (Δx and Δy , in mm)	8	$24/f^b$
For uniform grids: Maximum spacing between measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	5	$10/(f - 1)$
For graded grids: Maximum spacing between the two closest measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	4	$12/f$
For graded grids: Maximum incremental increase in the spacing between measured points in the direction normal to the phantom shell ($R_z = \Delta z_2/\Delta z_1$ in Figure 20)	1,5	1,5
Minimum edge length of the zoom scan volume in the x - and y -directions (L_z in O.8.3.2, in mm)	30	22
Minimum edge length of the zoom scan volume in the direction normal to the phantom shell (L_h in O.8.3.2 in mm)	30	22
Tolerance in the probe angle	1°	1°
^a δ is the penetration depth for a plane-wave incident normally on a planar half-space.		
^b This is the maximum spacing allowed, which might not work for all circumstances.		

8.2.4 Power Drift Measurement

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 Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power 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 that must remain within a maximum variation of $\pm 5\%$. Detail power drift measurement refer to appendix B.

9 Test Equipment list

Manufacturer	Equipment Name	Model	Serial Number	Calibration Date	Due Date of calibration
SPEAG	ELI	ELI V8.0	2227	NCR	NCR
SPEAG	E-Field Probe	EX3DV4	7858	2025/02/20	2026/02/19
SPEAG	Data Acquisition Electronics	DAE4	1847	2024/12/31	2025/12/30
SPEAG	System Validation Kits	CLA13	1043	2024/01/03	2027/01/02
SPEAG	Dielectric parameter probes	DAK12	1199	2025/01/20	2026/01/19
Agilent	Network Analyzer	E5071B	MY42302220	2025/03/11	2026/03/10
R&S	Signal Generator	SMR20	100648	2025/03/11	2026/03/10
R&S	AVG Power Sensor	NRP-Z21	101651	2025/03/11	2026/03/10
R&S	AVG Power Sensor	NRP-Z21	104189	2025/03/11	2026/03/10
HAISIDIKE	Thermometer	TP300	TOWE-EQ-SR-023	2025/03/12	2026/03/11
BingYu	Temperature and Humidity Indicator	HTC-1	TOWE-EQ-SR-025	2025/06/04	2026/06/03
Talent Microwave	Directional Coupler	TC-05180-10S	220420003	NCR	NCR
QiJi	Amplifier	YX28982301	TOWE-EQ-SR-020	NCR	NCR

Note:

1. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged or repaired during the interval.
2. The justification data of dipole can be found in Appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

10 SAR measurement variability

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. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue equivalent medium.

The following procedures are applied to determine if repeated measurements are required.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 or 2 W/kg (1-g or 10-g respectively), 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 or 3.6 W/kg ($\sim 10\%$ from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

11 Description of Test Position

11.1 RF exposure conditions

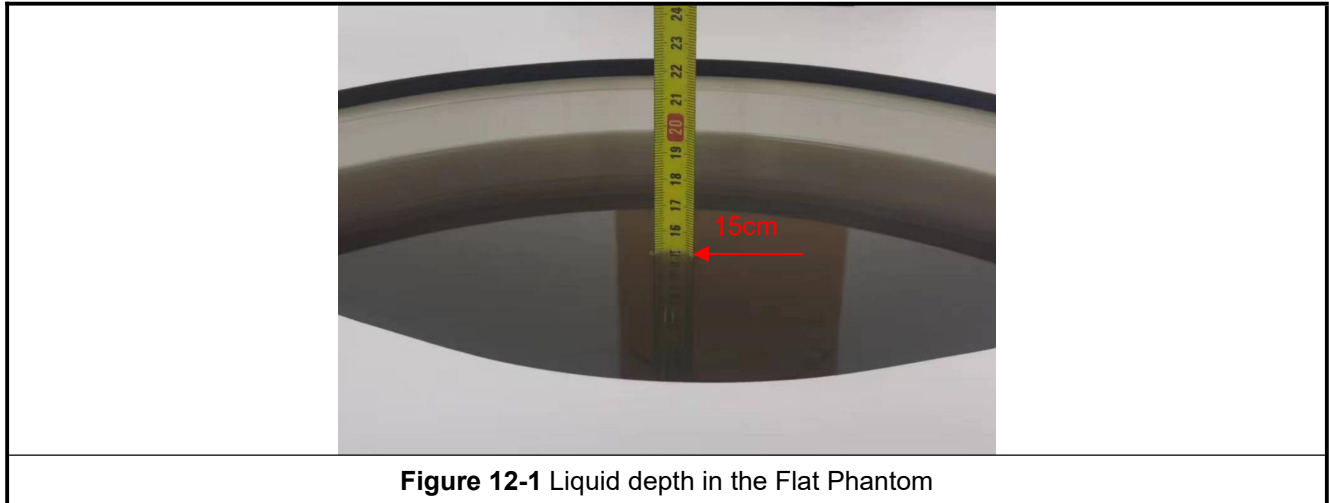
Wireless technologies	RF Exposure Conditions	DUT-to-User Separation
WPT 13.56MHz	Body	0 mm

Refer to the "Appendix D Test Setup Photos" for the antenna location diagram.

12 System Verification

12.1 Tissue Verification

The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. The temperature variation of the Tissue Simulate Liquids was $22\pm 2^{\circ}\text{C}$, the liquid depth of the ear reference point or the flat phantom was at least 15 cm (which is shown in Figure 12-1).



Frequency (MHz)	Tissue Type	Liquid Temp. ($^{\circ}\text{C}$)	Target Tissue		Measured Tissue		Deviation (Limit $\pm 5\%$)		Date
			Permittivity ϵ_r	Conductivity $\sigma(\text{S/m})$	Permittivity ϵ_r	Conductivity $\sigma(\text{S/m})$	$\Delta\epsilon_r$	$\Delta\sigma$	
13	Head	22.1	55.00	0.75	54.800	0.763	-0.36%	1.73%	2025/12/29

Table 1: Measurement Tissue Parameters

12.2 SAR System Check

Prior to SAR assessment, a SAR system Check measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. The System Performance Check Setup in Figure 12-3.

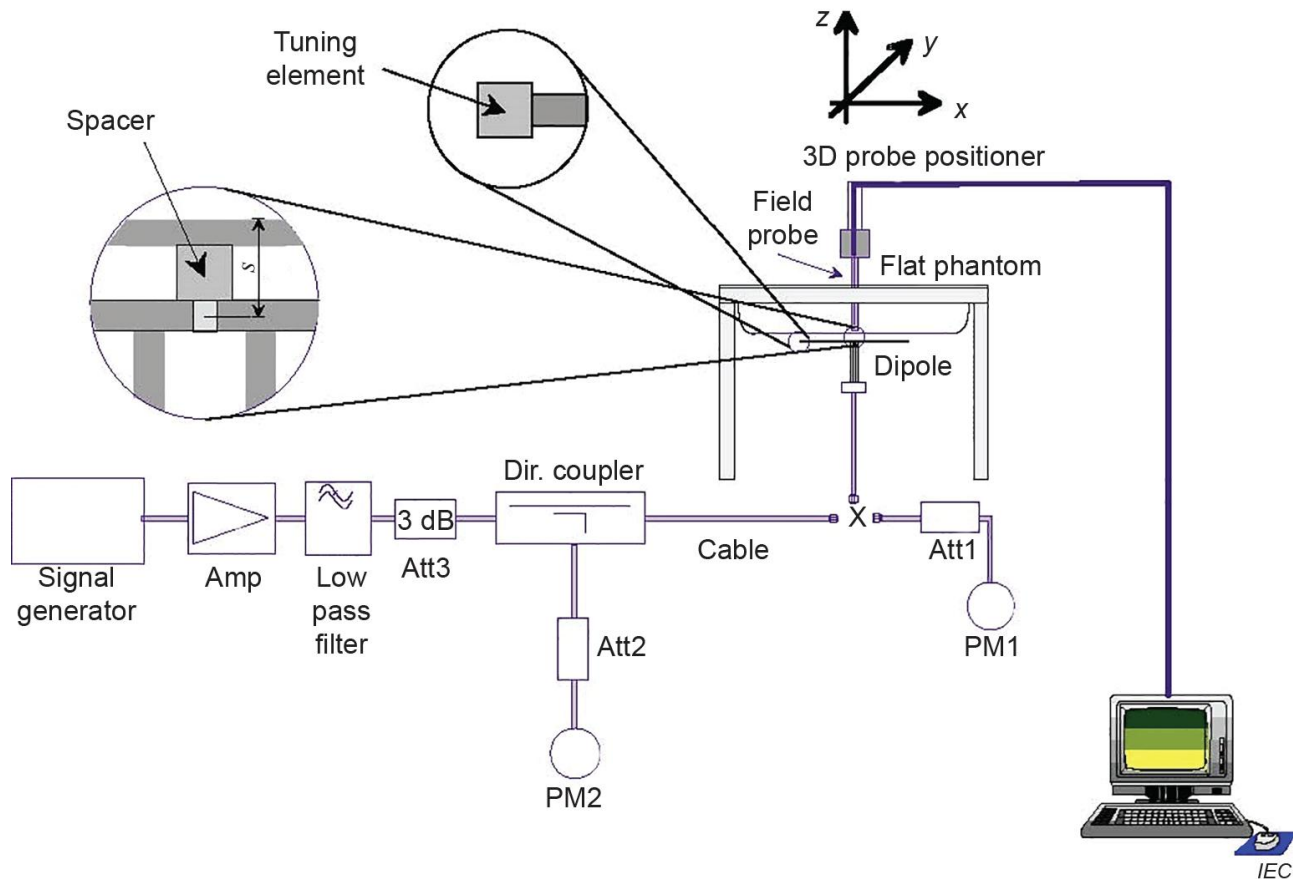


Figure 12-3 System Performance Check Setup

12.2.1 System Check Result

Frequency (MHz)	Tissue Type	Dipole	S/N	Target SAR (1W)		Measured SAR (100mW)		Measured SAR (normalized to 1W)		Deviation (Limit $\pm 10\%$)		Date
				1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	$\Delta 1g$	$\Delta 10g$	
13	Head	CLA-13	1043	0.484	0.297	0.046	0.029	0.460	0.290	-4.96%	-2.36%	2025/12/29

Table 2: SAR System Check Result

12.2.2 Detailed System Check Result

Please see Appendix A

13 Data Summary

General Notes:

- 1) The Highest SAR Plot refers to Appendix B.
- 2) Per KDB 447498 D01, testing of other required channels within the operating mode of a frequency band is not required when the reported 1g or 10g SAR for the mid-band or highest output power channel is:
 - $\leq 0.8\text{W/kg}$ for 1g or 2.0W/kg for 10g respectively, when the transmission band is $\leq 100\text{MHz}$.
 - $\leq 0.6\text{ W/kg}$ or 1.5 W/kg , for 1g or 10g respectively, when the transmission band is between 100 MHz and 200MHz.
 - $\leq 0.4\text{ W/kg}$ or 1.0 W/kg , for 1g or 10g respectively, when the transmission band is $\geq 200\text{MHz}$.

WPT Note:

1. The WPT is active only when the WPT Rx pen is connected with the device.
2. 13.56MHz WPT SAR is measured for all surface edges of the device with a transmitting antenna located within 25 mm.
3. The 13.56MHz WPT antenna port is not available on the device to support conducted power measurement, therefore the measured results are referred to as reported SAR.

13.1 SAR Measurement Result of WPT

Test Results					
Test position	Mode	Accessories	Freq. (MHz)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
Back side 0mm	ASK	Marker 1	13.56MHz	0.101	0.101
Back side 0mm	ASK	Marker 2	13.56MHz	0.098	0.098
Left side 0mm	ASK	Marker 1	13.56MHz	0.000	0.000
Right side 0mm	ASK	Marker 1	13.56MHz	0.025	0.025
Top side 0mm	ASK	Marker 1	13.56MHz	0.000	0.000
Bottom side 0mm	ASK	Marker 1	13.56MHz	0.001	0.001

Table 3: SAR of WPT

Note:

Description	Manufacturer	Model	Remark
Marker 1	reMarkable	Marker, RM04D	Provided by client
Marker 2	reMarkable	Marker Plus, RM05C	Provided by client

14 Measurement Uncertainty

The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$.

Input quantity X_i (source of uncertainty)	Unc. ($\pm$)	Prob. Dist. PDF _i	Unc. $a(x_i)$	C_i (1g)	C_i (10g)	U_i (1g) (%)	U_i (10g) (%)
Measurement system errors							
Probe calibration	18.6	N ($k = 2$)	2	1	1	9.3	9.3
Probe calibration drift	1.7	R	$\sqrt{3}$	1	1	1.0	1.0
Probe linearity and detection limit	0.9	R	$\sqrt{3}$	1	1	0.5	0.5
Broadband signal	0.5	R	$\sqrt{3}$	1	1	0.3	0.3
Probe isotropy	3.2	R	$\sqrt{3}$	1	1	1.8	1.8
Other probe and data acquisition errors	0.6	N	1	1	1	0.6	0.6
RF ambient and noise	3.0	R	$\sqrt{3}$	1	1	1.7	1.7
Probe positioning errors	0.5	N	1	0.33	0.33	0.2	0.2
Data processing errors	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Phantom and device (DUT or validation antenna) errors							
Measurement of phantom conductivity(σ)	2.5	N	1	0.78	0.71	2.0	1.8
Temperature effects (medium)	2.7	R	$\sqrt{3}$	0.78	0.71	1.2	1.1
Shell permittivity	14.0	R	$\sqrt{3}$	0.5	0.5	4.0	4.0
Distance between the radiating element of the DUT and the phantom medium	2.0	N	1	2	2	4.0	4.0
Repeatability of positioning the DUT or source against the phantom	2.9	N	1	1	1	2.9	2.9
Device holder effects	3.6	N	1	1	1	3.6	3.6
Effect of operating mode on probe sensitivity	2.4	R	$\sqrt{3}$	1	1	1.4	1.4
Time-average SAR	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Variation in SAR due to drift in output of DUT	2.5	N	1	1	1	2.5	2.5
Validation antenna uncertainty (validation measurement only)	0.0	N	1	1	1	0.0	0.0
Uncertainty in accepted power (validation measurement only)	0.0	N	1	1	1	0.0	0.0
Corrections to the SAR result (if applied)							
Phantom deviation from target (ϵ', σ)	1.9	N	1	1	0.84	1.9	1.6
SAR scaling	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Combined uncertainty	\					14.30	14.20
Expanded uncertainty and effective degrees of freedom ($k = 2$)	\					28.59	28.39

15 Calibration Certificate

Please see the Appendix C

16 Test Setup Photos

Please see the Appendix D

Appendix A: System Check Plots

Appendix B: SAR Test Plots

Appendix C: Calibration certificate

Appendix D: Test Setup Photos

--- The End ---
