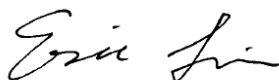


FCC SAR TEST REPORT

Application No.: KSCR2211002176AT(FYCR2210000419AT)
Applicant: DEVIALET
Address of Applicant: 10 Place Vendome 75001 Paris FRANCE
Manufacturer: DEVIALET
Address of Manufacturer: 10 Place Vendome 75001 Paris FRANCE
Factory: Tiinlab Corporation
Factory of Manufacturer: No. 3333, Liuxian Avenue, Tower A, 35th Floor, Tanglang City, Nanshan District, Shenzhen, China
Product Name: DEVIALET GEMINI II (TRUE WIRELESS EARBUDS)
Model No.(EUT): CF928, Earbud Right- CR928, Earbud Left- CL928, Charging case- CC928
Trade mark: DEVIALET
FCC ID: 2AN9V-CR928, 2AN9V-CL928
Standard(s) : FCC 47CFR §2.1093
Date of Receipt: 2022-12-07
Date of Test: 2022-12-08 to 2022-12-08
Date of Issue: 2022-12-14

Test Result:	Pass*
---------------------	--------------

* In the configuration tested, the EUT complied with the standards specified above.



Eric Lin
Laboratory Manager



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REVISION HISTORY

Revision Record			
Version	Description	Date	Remark
00	Original	2022-12-14	/

Authorized for issue by:			
		<i>Richard Kong</i>	
		<u>Richard.Kong/ Project Engineer</u>	
		<i>Eric Lin</i>	
		<u>Eric.Lin/Reviewer</u>	



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Compliance Certification Services (Kunshan) Inc.

Report No.: KSCR221100217601

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TEST SUMMARY

Frequency Band	Maximum Reported SAR(W/kg)	
	Head(Left Earphone)	Head(Right Earphone)
BT	0.55	0.43
SAR Limited(W/kg)	1.6	1.6



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1 General Information

1.1 General Description of EUT

Product Phase:	Production unit		
Device Type:	Portable device		
Exposure Category:	Uncontrolled environment / general population		
SN:	Q42A200345KUL		
Hardware Version:	V3		
Software Version:	earbuds0.7.6; charging case 0.3.5		
Antenna Gain:	Left earbud: -2.6dBi Right earbud: -2.6dBi (Provided by Manufacturer)		
Antenna Type:	LDS Antenna		
Device Operating Configurations:			
Modulation Mode:	BT: GFSK, $\pi/4$ DQPSK, 8DPSK BLE: GFSK		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
	BT	2402-2480	2402-2480
Battery Information:	Model:	ZJ1254H	
	Normal Voltage:	3.85V	
	Rated capacity:	70mAh	
	Battery Type:	Rechargeable Coin-type Lithium-ion cell	
	Manufacturer:	CHONGQING VDL ELECTRONICS CO., LTD.	



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1.1.1 DUT Antenna Locations

Please see the Appendix D



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1.2 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radio frequency Radiation Exposure Evaluation: Portable Devices
IEEE Std C95.1 – 1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 447498 D04	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
KDB 865664 D01 v01r04	SAR Measurement Requirements for 100 MHz to 6 GHz
KDB 865664 D02 v01r02	RF Exposure Compliance Reporting and Documentation Considerations



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1.3 RF exposure limits

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

Notes:

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

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

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

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

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



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1.4 Test Location

All tests were performed at:

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No.10 Weiye Rd, Innovation park, Eco&Tec, Development Zone, Kunshan City, Jiangsu, China.

Tel: +86 512 5735 5888

Fax: +86 512 5737 0818

No tests were sub-contracted.

Note:

1.SGS is not responsible for wrong test results due to incorrect information (e.g., max. internal working frequency, antenna gain, cable loss, etc) is provided by the applicant. (If applicable).

2.SGS is not responsible for the authenticity, integrity and the validity of the conclusion based on results of the data provided by applicant. (If applicable).

1.5 Test Facility

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

• A2LA

Compliance Certification Services (Kunshan) Inc. is accredited by the American Association for Laboratory Accreditation (A2LA). Certificate No. 2541.01.

• FCC

Compliance Certification Services (Kunshan) Inc. has been recognized as an accredited testing laboratory. Designation Number: CN1172.

• ISED

Compliance Certification Services (Kunshan) Inc. has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory

CAB Identifier: CN0072.

• VCCI

The 3m and 10m Semi-anechoic chamber and Shielded Room of Compliance Certification Services (Kunshan) Inc. has been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-20134, R-11600, C-11707, T-11499, G-10216 respectively.



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2 Laboratory Environment

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



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3 SAR Measurements System Configuration

3.1 The SAR Measurement System

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

The DASY5 system for performing compliance tests consists of the following items:

A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software .An arm extension for accommodation the data acquisition electronics (DAE).

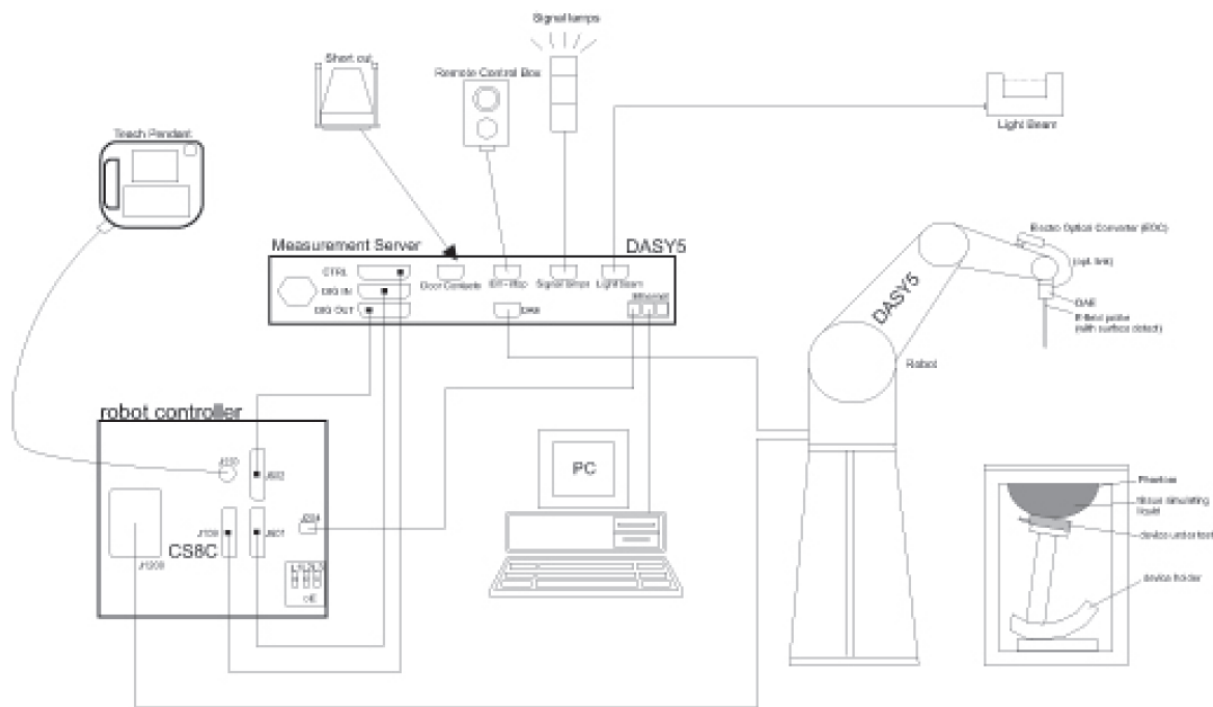
A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

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

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



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F-1. SAR Measurement System Configuration

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



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3.2 Isotropic E-field Probe EX3DV4

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



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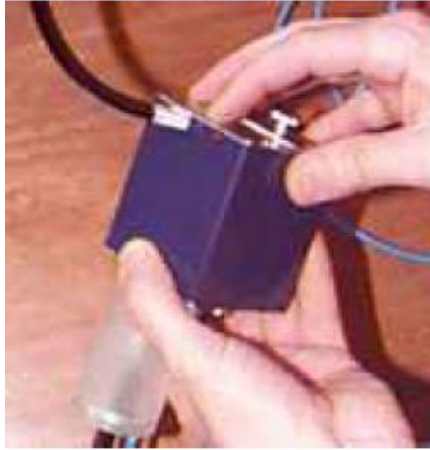
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3.3 Data Acquisition Electronics (DAE)

Model	DAE4	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)	
Input Offset Voltage	< 5μV (with auto zero)	
Input Bias Current	< 50 f A	
Dimensions	60 x 60 x 68 mm	

3.4 SAM Twin Phantom

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

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

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



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3.5 ELI Phantom

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

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

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



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3.6 Device Holder for Transmitters



F-2. Device Holder for Transmitters

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



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3.7 Measurement procedure

3.7.1 Scanning procedure

Step 1: Power reference measurement

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

Step 2: Area scan

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

Step 3: Zoom scan

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

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

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



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

Step 4: Power reference measurement (drift)

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



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3.7.2 Data Storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension ".DAE3". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated. The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [m W/g], [m W/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

3.7.3 Data Evaluation by SEMCAD

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

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

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

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

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

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

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



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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:

E-field probes:

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

H-field probes:

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

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

$Norm_i$ = sensor sensitivity of channel i ($i = x, y, z$)

[mV/(V/m)²] for E-field Probes

$ConvF$ = sensitivity enhancement in solution

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

f = carrier frequency [GHz]

E_i = electric field strength of channel i in V/m

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

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

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

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

$$SAR = (E_{tot}^2 \cdot \sigma) / (\epsilon \cdot 1000)$$

With SAR = local specific absorption rate in mW/g

E_{tot} = total field strength in V/m

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

ϵ = equivalent tissue density in g/cm³

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

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

with P_{pwe} = equivalent power density of a plane wave in mW/cm²

E_{tot} = total electric field strength in V/m

H_{tot} = total magnetic field strength in A/m



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4 SAR measurement variability and uncertainty

4.1 SAR measurement variability

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

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg ($\sim 10\%$ from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.



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4.2 SAR measurement uncertainty

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



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5 Description of Test Position

5.1 The Head Test Position

SAR can test the sides near the antenna, the surface of the device should be tested for SAR compliance with device touching the phantom. The SAR Exemption Limits in KDB 447498 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent device surface is used to determine if SAR testing is required for the adjacent surfaces, with the adjacent surface positioned against the phantom and the surface containing the antenna positioned perpendicular to the phantom.



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6 SAR System Verification Procedure

6.1 Tissue Simulate Liquid

6.1.1 Recipes for Tissue Simulate Liquid

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

Ingredients (% by weight)	Frequency (MHz)									
	450		835		915		1900		2450	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body	Head	Body
Water	38.56	51.16	41.45	52.4	41.05	56.0	54.9	40.4	62.7	73.2
Salt (NaCl)	3.95	1.49	1.45	1.4	1.35	0.76	0.18	0.5	0.5	0.04
Sugar	56.32	46.78	56.0	45.0	56.5	41.76	0.0	58.0	0.0	0.0
HEC	0.98	0.52	1.0	1.0	1.0	1.21	0.0	1.0	0.0	0.0
Bactericide	0.19	0.05	0.1	0.1	0.1	0.27	0.0	0.1	0.0	0.0
Triton X-100	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	36.8	0.0
DGBE	0.0	0.0	0.0	0.0	0.0	0.0	44.92	0.0	0.0	26.7
Dielectric Constant	43.42	58.0	42.54	56.1	42.0	56.8	39.9	54.0	39.8	52.5
Conductivity (S/m)	0.85	0.83	0.91	0.95	1.0	1.07	1.42	1.45	1.88	1.78

HSL5GHz is composed of the following ingredients:

Water: 50-65%

Mineral oil: 10-30%

Emulsifiers: 8-25%

Sodium salt: 0-1.5%

MSL5GHz is composed of the following ingredients:

Water: 64-78%

Mineral oil: 11-18%

Emulsifiers: 9-15%

Sodium salt: 2-3%



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6.1.2 Test Liquids Confirmation

Simulated tissue liquid parameter confirmation

The dielectric parameters were checked prior to assessment using the SPEAG DAK3.5 dielectric probe kit. The dielectric parameters measured are reported in each correspondent section.

IEEE SCC-34/SC-2 P1528 recommended tissue dielectric parameters

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

Target Frequency (MHz)	Head		Body	
	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
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
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

(ϵ_r = relative permittivity, σ = conductivity and $\rho = 1000 \text{ kg/m}^3$)



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6.1.3 Measurement for Tissue Simulate Liquid

The dielectric properties for this Tissue Simulate Liquids were measured by using the SPEAG DAK3.5 dielectric probe kit in conjunction with Agilent E5071B Network Analyzer (300 KHz-8500 MHz). The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was $22\pm 2^{\circ}\text{C}$.

Tissue Type	Measured Frequency (MHz)	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Liquid Temp. ($^{\circ}\text{C}$)	Date
2450 Head	2450	1.80	38.23	1.80	39.20	0.11	-2.48	± 5	22	2022/12/8



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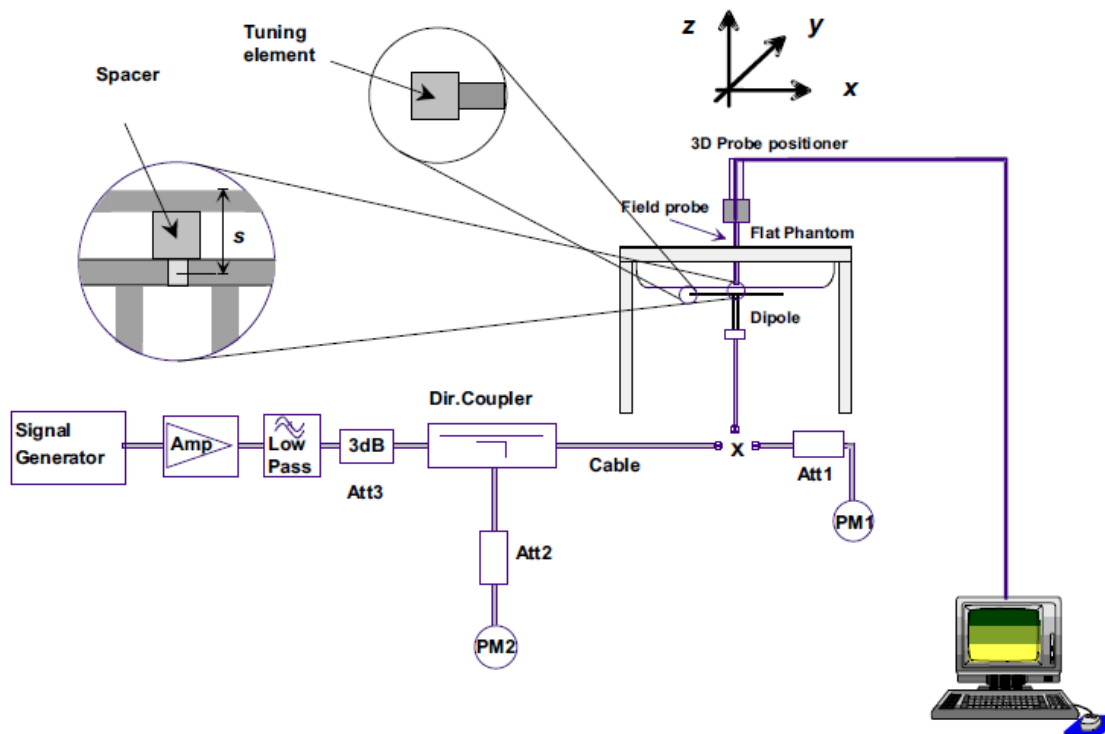
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6.2 SAR System Check

The microwave circuit arrangement for system check is sketched in bellow figure. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table. During the tests, the ambient temperature of the laboratory was in the range $22 \pm 2^\circ\text{C}$, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above 15 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



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



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6.2.1 Justification for Extended SAR Dipole Calibrations

1) Referring to KDB 865664 requirements for dipole calibration, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.

- a) There is no physical damage on the dipole;
- b) System check with specific dipole is within 10% of calibrated value;
- c) Return-loss is within 10% of calibrated measurement;
- d) Impedance is within 5Ω from the previous measurement.

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



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6.2.2 Summary System Check Result(s)

Validation Kit		Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1w)	Measured SAR (normalized to 1w)	Target SAR (normalized to 1w) (±10%)	Target SAR (normalized to 1w) (±10%)	Liquid Temp. (°C)	Measured Date
		1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)		
D2450V2	Head	12.5	5.87	50	23.48	53 (47.70~58.30)	24.7 (22.23~27.17)	22	2022/12/8

6.2.3 Detailed System Check Results

Please see the Appendix A



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7 Test Configuration

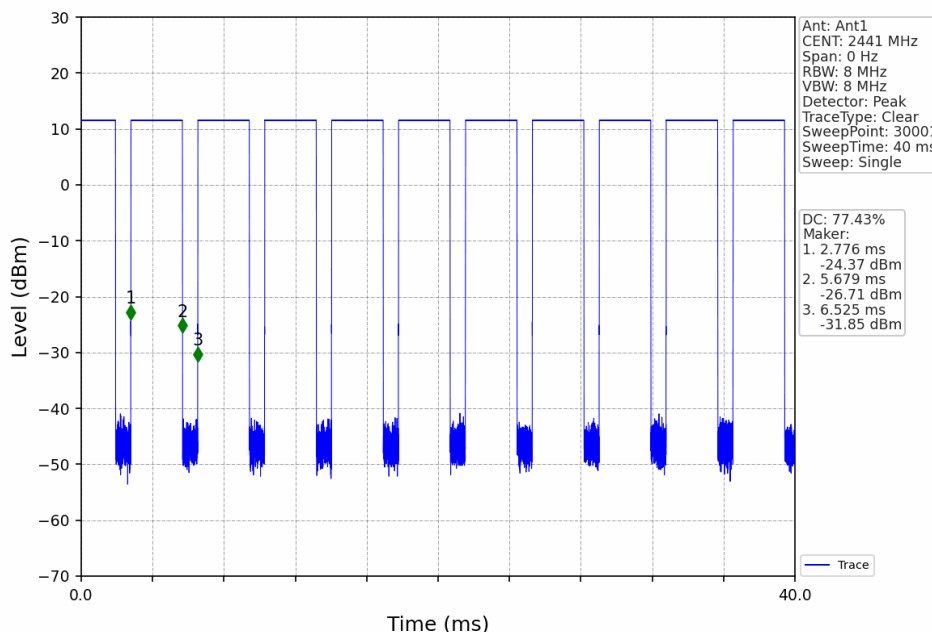
7.1 Operation Configurations

7.1.1 Bluetooth Test Configuration

For the Bluetooth SAR tests, a communication link is set up with the test mode software for BT mode test. Bluetooth USES frequency hopping technology to divide the transmitted data into packets and transmit the packets respectively through 79 designated Bluetooth channels, 1MHz Bandwidth, frequency hops at 1600 hops/second per the Bluetooth standard. The Radio Frequency Channel Number (RFCN) is allocated to 0, 39 and 78 respectively in the case of 2402~2480 MHz during the test at each test frequency channel, the EUT is operated at the RF continuous emission mode.

7.1.1.1 Duty cycle

Bluetooth duty cycle for Left Earphone: 77.43%



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8 Test Result

8.1 Measurement of RF Conducted Power

8.1.1 Conducted Power Of BT

BT			Average Conducted Power (dBm) Left Earbud	Tune up (dBm)	Average Conducted Power (dBm) Right Earbud	Tune up (dBm)
Modulation	Channel	Frequency (MHz)				
GFSK	0	2402	10.51	12	11.12	12
	39	2441	11.33	12	11.93	12
	78	2480	10.79	12	11.47	12
$\pi/4$ DQPSK	0	2402	7.95	9	8.36	9
	39	2441	8.59	9	8.61	9
	78	2480	8.08	9	8.31	9
8DPSK	0	2402	8.32	9	8.39	9.5
	39	2441	8.88	9	9.35	9.5
	78	2480	8.51	9	8.68	9.5

BLE 1M			Average Conducted Power (dBm) Left Earbud	Tune up (dBm)	Average Conducted Power (dBm) Right Earbud	Tune up (dBm)
Modulation	Channel	Frequency (MHz)				
GFSK	0	2402	7.36	9	7.42	9
	19	2440	8.1	9	8.25	9
	39	2480	7.51	9	7.78	9

BLE 2M			Average Conducted Power (dBm) Left Earbud	Tune up (dBm)	Average Conducted Power (dBm) Right Earbud	Tune up (dBm)
Modulation	Channel	Frequency (MHz)				
GFSK	0	2402	7.35	9	7.51	9
	19	2440	8.06	9	8.43	9
	39	2480	7.68	9	7.84	9



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8.2 Measurement of SAR Data

8.2.1 SAR Result Of Bluetooth

Test position	Test mode	Test Ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg)1-g	SAR (W/kg)10-g	Power drift (dB)	Conducted power (dBm)	Tune up Limit (dBm)	Scaled factor	Scaled SAR (W/kg) 1-g	Liquid Temp.	Limit (W/kg) 1-g
Head SAR Data for Left Earphone (Separate 0mm)													
Left Earphone Front	GFSK	39/2441	77.43%	1.29	0.346	0.121	-0.04	11.33	12	1.167	0.521	22.0	1.6
Left Earphone Back	GFSK	39/2441	77.43%	1.29	0.035	0.016	0.04	11.33	12	1.167	0.053	22.0	1.6
Side 1	GFSK	39/2441	77.43%	1.29	0.060	0.026	0.11	11.33	12	1.167	0.090	22.0	1.6
Side 2	GFSK	39/2441	77.43%	1.29	0.194	0.063	-0.03	11.33	12	1.167	0.292	22.0	1.6
Side 3	GFSK	39/2441	77.43%	1.29	0.196	0.070	0.06	11.33	12	1.167	0.295	22.0	1.6
Side 4	GFSK	39/2441	77.43%	1.29	0.368	0.123	0.07	11.33	12	1.167	0.554	22.0	1.6
Side 4	GFSK	0/2402	77.43%	1.29	0.302	0.101	0.08	10.51	12	1.409	0.549	22.0	1.6
Side 4	GFSK	78/2480	77.39%	1.29	0.320	0.107	-0.14	10.79	12	1.321	0.546	22.0	1.6
Head SAR data for Right Earphone (Separate 0mm)													
Right Earphone Front	GFSK	39/2441	77.41%	1.29	0.221	0.086	0.03	11.93	12	1.016	0.290	22.0	1.6
Right Earphone Back	GFSK	39/2441	77.41%	1.29	0.022	0.011	0.05	11.93	12	1.016	0.029	22.0	1.6
Side 5	GFSK	39/2441	77.41%	1.29	0.045	0.020	-0.06	11.93	12	1.016	0.059	22.0	1.6
Side 6	GFSK	39/2441	77.41%	1.29	0.325	0.103	-0.02	11.93	12	1.016	0.427	22.0	1.6
Side 7	GFSK	39/2441	77.41%	1.29	0.162	0.051	0.16	11.93	12	1.016	0.213	22.0	1.6
Side 8	GFSK	39/2441	77.41%	1.29	0.139	0.046	0.19	11.93	12	1.016	0.183	22.0	1.6
Side 6	GFSK	0/2402	77.43%	1.29	0.268	0.082	0.13	11.12	12	1.225	0.424	22.0	1.6
Side 6	GFSK	78/2480	77.41%	1.29	0.287	0.091	0.01	11.47	12	1.130	0.419	22.0	1.6

Note:

- 1) The maximum Scaled SAR value is marked in bold. Graph results refer to Appendix B
- 2) The scaled SAR = Measured SAR(W/kg)1-g * Duty Cycle Scaled factor * Scaled factor
- 3) Duty Cycle Scaled factor = 100% Duty Cycle / Measured Duty Cycle
- 4) If the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is not required for such test configuration(s). When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel.



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9 Equipment list

Test Platform		SPEAG DASY5 Professional				
Location		Compliance Certification Services (Kunshan) Inc.				
Software Reference		DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)				
Hardware Reference						
Equipment		Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	P C	HP	Core(rm)3.16G	CZCO48171H	N/A	N/A
☒	Signal Generator	Agilent	E5182A	MY50142015	2022/08/22	2023/08/21
☒	S-Parameter Network Analyzer	Agilent	E5071B	MY42301382	2022/02/20	2023/02/19
☒	DAK-3.5 probe	SPEAG	DAK-3.5	1102	N/A	N/A
☒	Wireless Communication Test Set	R&S	CMW500	159275	2022/08/22	2023/08/21
☒	Communication System	Anritsu	MT8820C	6201465349	2022/04/01	2023/03/31
☒	Power meter	Agilent	E4416A	GB41292714	2022/01/22	2023/01/21
☒	Power Sensor	Agilent	E9327A	Us40441788	2022/01/22	2023/01/21
☒	DAE	SPEAG	DAE4	1245	2022/05/30	2023/05/29
☒	E-field PROBE	SPEAG	EX3DV4	7346	2022/03/30	2023/03/29
☒	Dipole	SPEAG	D2450V2	817	2022/04/01	2025/03/31
☒	Electro Thermometer	Renke	RS-WS-N01-6J	1032862	2022/04/01	2023/03/31
☒	Amplifier	Mini-circuits	ZVE-8G	110405	N/A	N/A
☒	Amplifier	Mini-circuits	ZHL-42	QA1331003	N/A	N/A
☒	3db ATTENUATOR	MINI	MCL BW-S3W5	0533	N/A	N/A
☒	DUMMY PROBE	SPEAG	DP_2	SPDP2001AA	N/A	N/A
☒	Dual Directional Coupler	Woken	20W couple	DOM2BHW1A1	N/A	N/A
☒	SAM PHANTOM (ELI4 v4.0)	SPEAG	QDOVA001BB	1102	N/A	N/A



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☒	Twin SAM Phantom	SPEAG	QD000P40CD	1609	N/A	N/A
☒	ROBOT	SPEAG	TX60	F10/5E6AA1/A101	N/A	N/A
☒	ROBOT KRC	SPEAG	CS8C	F10/5E6AA1/C101	N/A	N/A
☒	LIQUID CALIBRATION KIT	ANTENNESSA	41/05 OCP9	00425167	N/A	N/A

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



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10 Calibration certificate

Please see the Appendix C

11 Photographs

Please see the Appendix D



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Appendix A: Detailed System Check Results

The plots are showing as followings.



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Date: 2022/12/08

Test Laboratory: Compliance Certification Services (Kunshan) Inc.

System Performance Check- D2450

DUT: Dipole 2450 MHz D2450V2; Type: 817

Communication System: UID 0, CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2450 \text{ MHz}$; $\sigma = 1.802 \text{ S/m}$; $\epsilon_r = 38.226$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

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

DASY5 Configuration:

- Probe: EX3DV4 - SN7346; ConvF(7.63, 7.63, 7.63); Calibrated: 2022/03/30;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1245; Calibrated: 2022/05/30
- Phantom: Twin SAM Phantom; Type: QD 000 P40 CD; Serial: 1609
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

System Performance Check at Frequencies above 1 GHz/d=10mm, Pin=250 mW, dist=2.0mm (EX-Probe)/Area Scan (8x9x1): Measurement grid: dx=12mm, dy=12mm

Maximum value of SAR (measured) = 15.9 W/kg

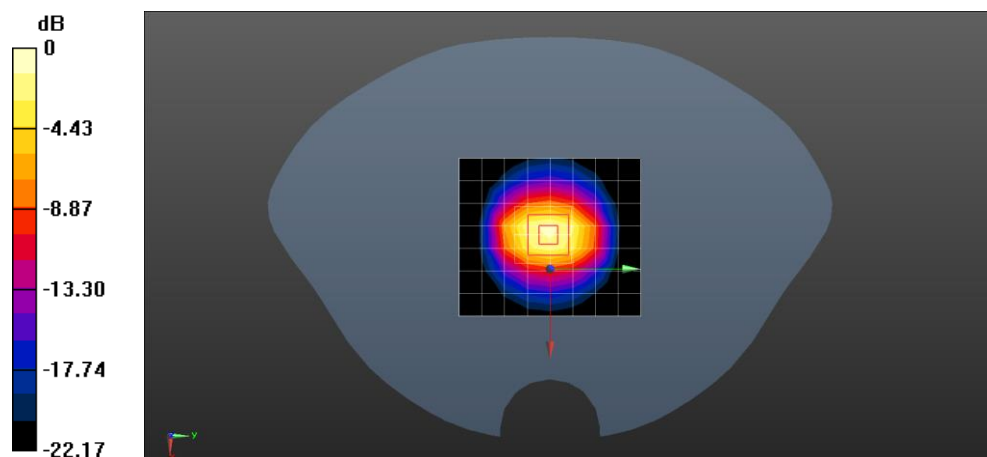
System Performance Check at Frequencies above 1 GHz/d=10mm, Pin=250 mW, dist=2.0mm (EX-Probe)/Zoom Scan (7x7x7) (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 105.8 V/m; Power Drift = -0.10 dB

Peak SAR (extrapolated) = 25.4 W/kg

SAR(1 g) = 12.5 W/kg; SAR(10 g) = 5.87 W/kg

Maximum value of SAR (measured) = 18.8 W/kg



0 dB = 18.8 W/kg = 12.74 dBW/kg



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Appendix B: Detailed Test Results

The plots of worse case are showing as followings.



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Date: 2022/12/08

Test Laboratory: Compliance Certification Services (Kunshan) Inc.

Bluetooth DH5 GFSK Side 4 side Ch39 0mm

DUT: TRUE WIRELESS EARBUDS; Type: CF928;

Communication System: UID 0, Bluetooth (0); Frequency: 2441 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2441 \text{ MHz}$; $\sigma = 1.787 \text{ S/m}$; $\epsilon_r = 38.363$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

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

DASY5 Configuration:

- Probe: EX3DV4 - SN7346; ConvF(7.63, 7.63, 7.63); Calibrated: 2022/03/30;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1245; Calibrated: 2022/05/30
- Phantom: Twin SAM Phantom; Type: QD 000 P40 CD; Serial: 1609
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Configuration/Head/Area Scan (6x7x1): Measurement grid: $dx=12\text{mm}$, $dy=12\text{mm}$

Maximum value of SAR (measured) = 0.566 W/kg

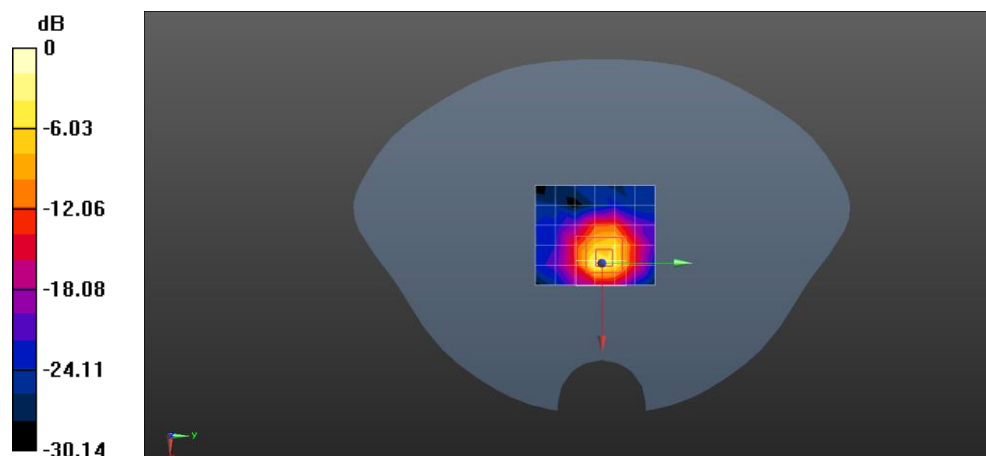
Configuration/Head/Zoom Scan (7x7x7)/Cube 0: Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$

Reference Value = 11.35 V/m; Power Drift = 0.07 dB

Peak SAR (extrapolated) = 1.52 W/kg

SAR(1 g) = 0.368 W/kg; SAR(10 g) = 0.123 W/kg

Maximum value of SAR (measured) = 1.04 W/kg



0 dB = 1.04 W/kg = 0.17 dBW/kg



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Appendix C: Calibration certificate

Appendix D: Photographs

---END---



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