



SAR Test Report

Report No.: STS2503159H01

Issued for

FOXX Development Inc.

3480 Preston Ridge Road, Suite500, Alpharetta, GA 30005, USA

Product Name: Smart Phone

Brand Name: FOXXD, FOXX, MIRO

Model Name: A65L

Series Model(s): N/A

FCC ID: 2AQRM-A65L

Test Standard: ANSI/IEEE Std. C95.1
FCC 47 CFR Part 2 (2.1093)
IEEE Std. 1528-2013

Max. Report Head: 0.273 W/kg
SAR (1g) Body: 0.426 W/kg

The test results presented in this report relate only to the object tested. This report shall not be reproduced, except in full, without the written approval of the Shenzhen STS Test Services Co., Ltd.

**TEST REPORT CERTIFICATION****Applicant's name**.....: FOXX Development Inc.

Address.....: 3480 Preston Ridge Road, Suite500, Alpharetta, GA 30005, USA

Manufacturer's Name.....: FOXX Development Inc.

Address.....: 3480 Preston Ridge Road, Suite500, Alpharetta, GA 30005, USA

Product description

Product name.....: Smart Phone

Brand name: FOXXD, FOXX, MIRO

Model name: A65L

Series Model.....: N/A

ANSI/IEEE Std. C95.1

Standards.....: FCC 47 CFR Part 2 (2.1093)

IEEE Std. 1528-2013

The device was tested by Shenzhen STS Test Services Co., Ltd. in accordance with the measurement methods and procedures specified in KDB 865664 The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

Date of Test.....:

Date (s) of performance of tests.....: 14 Mar. 2025

Date of Issue.....: 26 Mar. 2025

Test Result.....: **Pass**

Testing Engineer :

(Xin.Liu)

Technical Manager :

(Shifan. Long)

Authorized Signatory :

(Bovey Yang)





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**Revision History**

Rev.	Issue Date	Report No.	Effect Page	Contents
00	26 Mar. 2025	STS2503159H01	ALL	Initial Issue



1. General Information

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head and body tissues exposed to radio frequency (RF) radiation from wireless portable devices for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC).

1.1 EUT Description

Product Name	Smart Phone
Brand Name	FOXXD, FOXX, MIRO
Model Name	A65L
Series Model	N/A
Model Difference	N/A
Battery	Charge Limit Voltage:4.35V Capacity: 3000mAh
Device Category	Portable
Product stage	Production unit
RF Exposure Environment	General Population / Uncontrolled
Hardware Version	N/A
Software Version	N/A
Frequency Range	LTE Band 7: 2500 MHz ~ 2570 MHz



Max. Reported SAR(1g): (Limit:1.6W/kg) Test distance: Head:0mm Body:10mm	Band	Mode	Head (W/kg)	Body Worn and Hotspot(W/kg)
	PCE	LTE Band 7	0.273	0.426
FCC Equipment Class	Licensed Portable Transmitter Held to Ear (PCE)			
Operating Mode:	LTE: QPSK, 16QAM			
Antenna Specification:	LTE: PIFA Antenna			
SIM Card	Support dual-SIM, dual standby, the multiple SIM card with two lines cannot transmitting at the same time			
Hotspot Mode	Support			
DTM Mode	Not Support			
Note: 1. The dual SIM card mobile has 2 SIM slots and supports dual SIM dual standby. The WWAN radio transmission will be enabled by either one SIM at a time (Single active) 2. After pre-scan two SIM cards power, we found test result of the SIM1 was the worse, so we chose SIM1 card to perform all tests. 3. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power				

1.2 Test Environment

Ambient conditions in the SAR laboratory:

Items	Required
Temperature (°C)	18-25
Humidity (%RH)	30-70

1.3 Test Factory

ShenZhen STS Test Services Co.,Ltd.

A 1/F, Building B, Zhuoke Science Park, No.190 Chongqing Road, HepingShequ, Fuyong Sub-District, Bao'an District, Shenzhen, Guang Dong, China

FCC test Firm Registration No.: 625569

IC Registration No.: 12108A

A2LA Certificate No.: 4338.01



2. Test Standards and Limits

No.	Identity	Document Title
1	47 CFR Part 2	Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
2	IEEE Std. C95.1-2019	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
3	IEEE Std. 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
4	FCC KDB 447498 D04 v01	RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices
5	FCC KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
6	FCC KDB 865664 D02 v01r02	RF Exposure Reporting
7	FCC KDB 941225 D05 v02r05	SAR for LTE Devices
8	FCC KDB 941225 D06 v02r01	Hotspot Mode SAR
9	FCC KDB 648474 D04 v01r03	SAR Evaluation Considerations for Wireless Handsets

(A). Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

(B). Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

NOTE: Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

Population/Uncontrolled Environments:

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

Occupational/Controlled Environments:

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

NOTE

GENERAL POPULATION/UNCONTROLLED EXPOSURE

PARTIAL BODY LIMIT

1.6 W/kg

3. SAR Measurement System

3.1 Definition of Specific Absorption Rate (SAR)

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.

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 measurement can be related to the electrical field in the tissue by

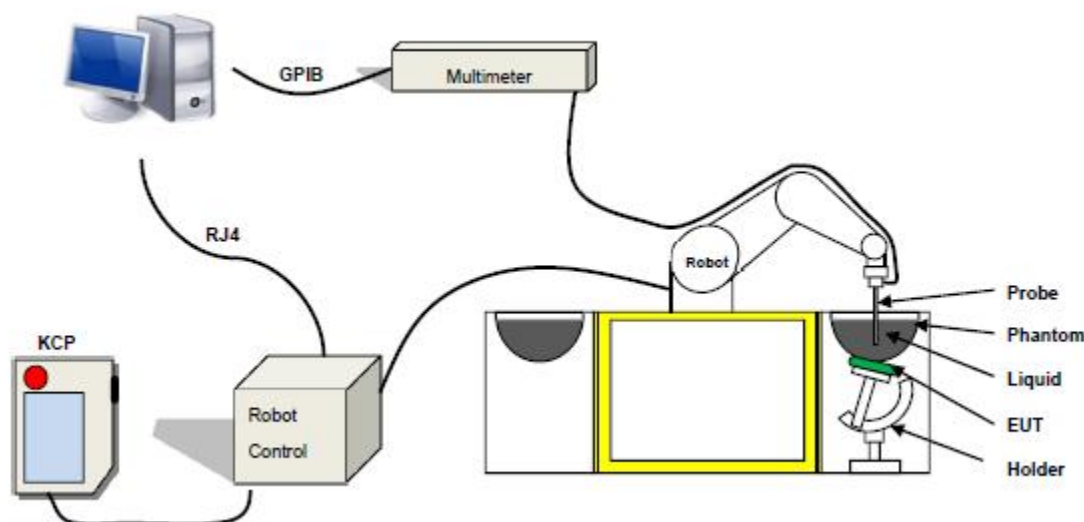
$$SAR = \frac{\sigma E^2}{\rho}$$

Where: σ is the conductivity of the tissue,

ρ is the mass density of the tissue and E is the RMS electrical field strength.

3.2 SAR System

MVG SAR System Diagram:



COMOSAR is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The COMOSAR system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The Open SAR software computes the results to give a SAR value in a 1g or 10g mass.

3.2.1 Probe

For the measurements the Specific Dosimetric E-Field Probe SN 08/21 EPG0352 with following specifications is used

- Probe Length: 330 mm
- Length of Individual Dipoles: 2 mm
- Maximum external diameter: 8 mm
- Probe Tip External Diameter: 2.5 mm
- Distance between dipole/probe extremity: 1 mm
- Dynamic range: 0.01-100 W/kg
- Probe linearity: 3%
- Axial Isotropy: < 0.10 dB
- Spherical Isotropy: < 0.10 dB
- Calibration range: 150 MHz to 6 GHz for head & body simulating liquid.
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°



Figure 1-MVG COMOSAR Dosimetric E field Dipole

3.2.2 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

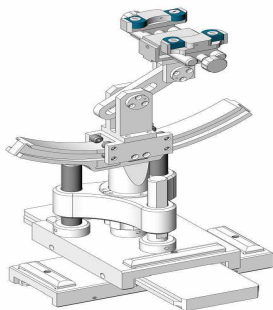
SN 32/14 SAM115



Figure-SN 21/21 ELLI48



3.2.3 Device Holder



The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ± 0.5 mm would produce a SAR uncertainty of ± 20 %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.



4. Tissue Simulating Liquids

4.1 Simulating Liquids Parameter Check

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 described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Head Tissue

Frequency (MHz)	cellulose %	DGBE %	HEC %	NaCl %	Preventol %	Sugar %	X100 %	Water %	Conductivity σ	Permittivity ϵ_r
750	0.2	/	/	1.4	0.2	57.0	/	41.1	0.89	41.9
835	0.2	/	/	1.4	0.2	57.9	/	40.3	0.90	41.5
900	0.2	/	/	1.4	0.2	57.9	/	40.3	0.97	41.5
1800	/	44.5	/	0.3	/	/	30.45	55.2	1.4	40.0
1900	/	44.5	/	0.3	/	/	30.45	55.2	1.4	40.0
2000	/	44.5	/	0.3	/	/	/	55.2	1.4	40.0
2450	/	44.9	/	0.1	/	/	/	55.0	1.80	39.2
2600	/	45.0	/	0.1	/	/	/	54.9	1.96	39.0

Body Tissue

Frequency (MHz)	cellulose %	DGBE %	HEC %	NaCl %	Preventol %	Sugar %	X100 %	Water %	Conductivity σ	Permittivity ϵ_r
750	0.2	/	/	0.9	0.1	47.2	/	51.7	0.96	55.5
835	0.2	/	/	0.9	0.1	48.2	/	50.8	0.97	55.2
900	0.2	/	/	0.9	0.1	48.2	/	50.8	1.05	55.0
1800	/	29.4	/	0.4	/	/	30.45	70.2	1.52	53.3
1900	/	29.4	/	0.4	/	/	30.45	70.2	1.52	53.3
2000	/	29.4	/	0.4	/	/	/	70.2	1.52	53.3
2450	/	31.3	/	0.1	/	/	/	68.6	1.95	52.7
2600	/	31.7	/	0.1	/	/	/	68.2	2.16	52.3

Tissue dielectric parameters for head and body phantoms				
Frequency	ϵ_r		σ S/m	
	Head	Body	Head	Body
300	45.3	58.2	0.87	0.92
450	43.5	56.7	0.87	0.94
900	41.5	55.0	0.97	1.05
1450	40.5	54.0	1.20	1.30
1800	40.0	53.3	1.40	1.52
2450	39.2	52.7	1.80	1.95
3000	38.5	52.0	2.40	2.73
5800	35.3	48.2	5.27	6.00

**LIQUID MEASUREMENT RESULTS**

Date	Ambient		Simulating Liquid		Parameters	Target	Measured	Deviation %	Limited %
	Temp. [°C]	Humidity %	Frequency(MHz)	Temp. [°C]					
2025-03-14	22.0	49	2560	21.9	Permittivity	39.05	40.04	2.53	±5
					Conductivity	1.92	1.89	-1.43	±5
2025-03-14	22.0	49	2600	21.9	Permittivity	39.00	38.54	-1.18	±5
					Conductivity	1.96	1.92	-2.04	±5



6. SAR Evaluation Procedures

The procedure for assessing the average SAR value consists of the following steps:

The following steps are used for each test position

- Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface
- Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
- Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
- Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

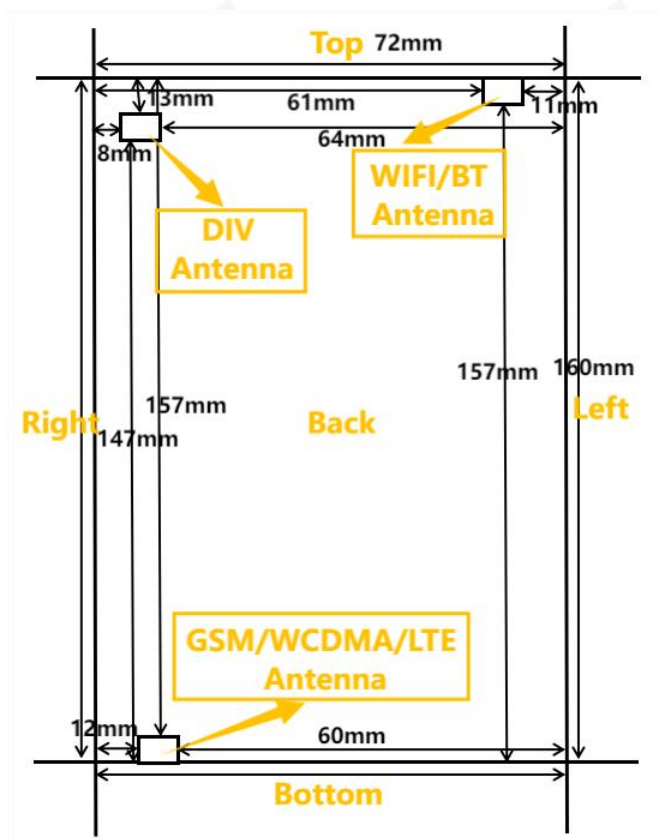
➤ Area Scan& Zoom Scan

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01 quoted below.

When the 1-g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.

7. EUT Antenna Location Sketch

It is a Smart phone, support LTE mode.



Antenna Separation Distance(cm)						
ANT	Back Side	Front Side	Left Side	Right Side	Top Side	Bottom Side
LTE	≤0.5	≤0.5	6	1.2	15.7	≤0.5

Note 1: The antenna information refer the manufacturer provide report, applicable only to the tested sample identified in the report.



7.1 SAR test exclusion consider table

The WWAN SAR evaluation of Maximum power (dBm) summing tolerance.

Exposure Position	Wireless Interface	LTE Band 7
	Calculated Frequency(GHz)	2.56
	Maximum Turn-up power (dBm)	20
	Maximum rated power(mW)	100.00
Back Side	Separation distance (cm)	≤0.5
	exclusion threshold(mW)	2.65
	Testing required?	YES
Front Side	Separation distance (cm)	≤0.5
	exclusion threshold(mW)	2.65
	Testing required?	YES
Left Edge	Separation distance (cm)	6
	exclusion threshold(mW)	306.29
	Testing required?	NO
Right Edge	Separation distance (cm)	1.2
	exclusion threshold(mW)	14.12
	Testing required?	YES
Top Edge	Separation distance (cm)	15.7
	exclusion threshold(mW)	1926.39
	Testing required?	NO
Bottom Edge	Separation distance (cm)	≤0.5
	exclusion threshold(mW)	2.65
	Testing required?	YES

Note:

1. maximum power is the source-based time-average power and represents the maximum RF output power among production units.
2. Per KDB 447498 D04, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
3. Per KDB 447498 D04, if the maximum time-averaged power available does not exceed 1 mW. This stand-alone SAR exemption test.



4. Per KDB 447498 D04, the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

Where

$$x = -\log_{10} \left(\frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right) \text{ and } f \text{ is in GHz;}$$

and

$$ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

d = the separation distance (cm);

5. Per KDB 447498 D04, An alternative to the SAR-based exemption is using below table and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in below table to apply, R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole (1.64 linear value).

RF Source frequency (MHz)	Threshold ERP(watts)
0.3-1.34	$1,920 R^2$.
1.34-30	$3,450 R^2/f^2$.
30-300	$3.83 R^2$.
300-1,500	$0.0128 R^2 f$.
1,500-100,000	$19.2 R^2$.



6. Per KDB 248227 D01, choose the highest output power channel to test SAR and determine further SAR exclusion 8. for each frequency band, testing at higher data rates and higher order modulations is not required when the maximum average output power for each of each of these configurations is less than 1/4db higher than those measured at the lower data rate than 11b mode, thus the SAR can be excluded.
7. Per KDB 616217 D04, SAR evaluation for the front surface of tablet display screens are generally not necessary.

8. EUT Test Position

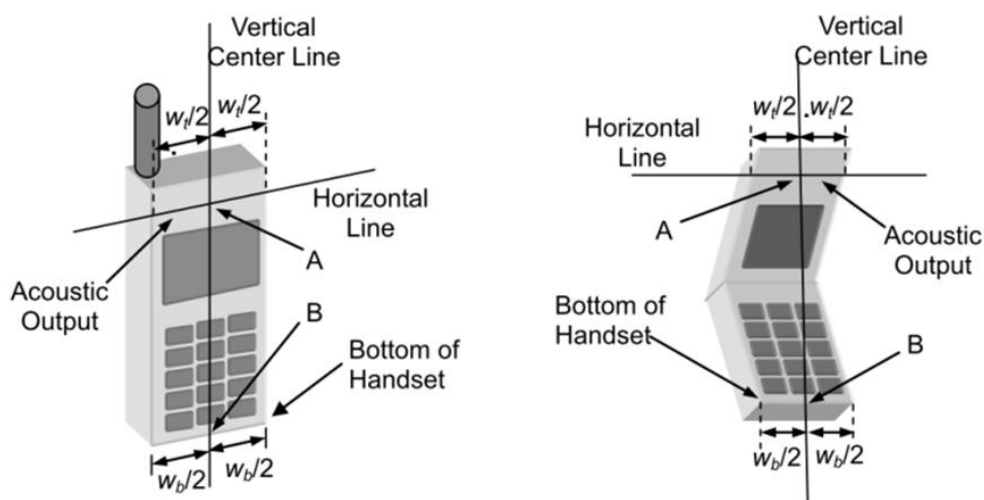
This EUT was tested in Right Cheek, Right Titled, Left Cheek, Left Titled, Front Face and Rear Face.

8.1 Define Two Imaginary Lines on the Handset

(1) The vertical centerline passes through two points on the front side of the handset the midpoint of the width w_t of the handset at the level of the acoustic output, and the midpoint of the width w_b of the handset.

(2) The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output. The horizontal line is also tangential to the face of the handset at point A.

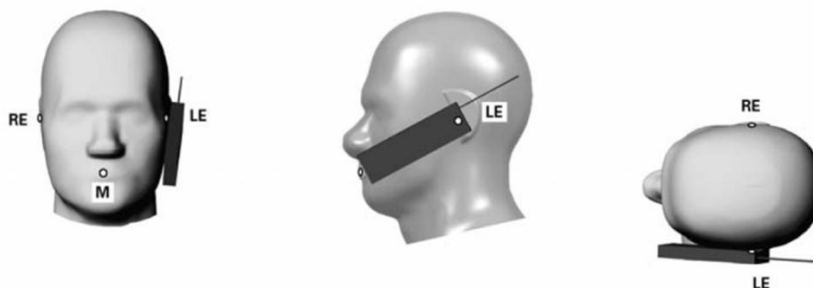
(3) The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily to the front face of the handset, especially for clamshell handsets, handsets with flip covers, and other irregularly shaped handsets.



Cheek Position

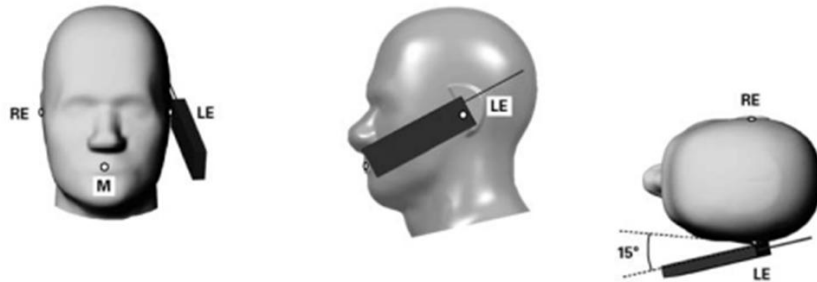
1) To position the device with the vertical center line of the body of the device and the horizontal line crossing the center piece in a plane parallel to the sagittal plane of the phantom. While maintaining the device in this plane, align the vertical center line with the reference plane containing the ear and mouth reference point (M: Mouth, RE: Right Ear, and LE: Left Ear) and align the center of the ear piece with the line RE-LE.

2) To move the device towards the phantom with the ear piece aligned with the line LE-RE until the phone touched the ear. While maintaining the device in the reference plane and maintaining the phone contact with ear, move the bottom of the phone until any point on the front side is in contact with the cheek of the phantom or until contact with the ear is lost



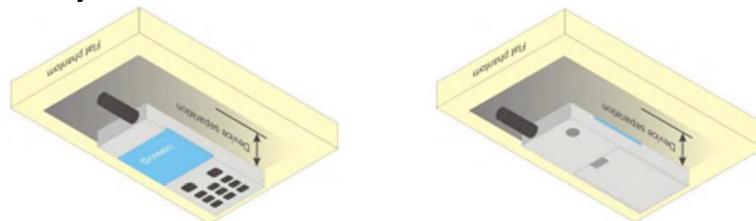
Title Position

- (1) To position the device in the “cheek” position described above.
- (2) While maintaining the device in the reference plane described above and pivoting against the ear, moves it outward away from the mouth by an angle of 15 degrees or until with the ear is lost.



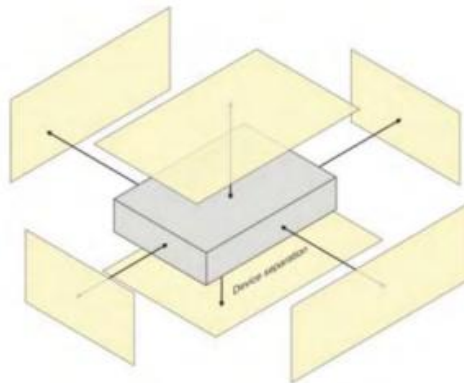
Body-worn Position Conditions:

Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in KDB Publication 447498 D01 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. When the same wireless transmission configuration is used for testing body-worn accessory and hotspot mode SAR, respectively, in voice and data mode, SAR results for the most conservative *test separation distance* configuration may be used to support both SAR conditions. When the *reported* SAR for a body-worn accessory, measured without a headset connected to the handset, is $> 1.2 \text{ W/kg}$, the highest *reported* SAR configuration for that wireless mode and frequency band should be repeated for the body-worn accessory with a headset attached to the handset.



8.2 Hotspot mode exposure position condition

For handsets that support hotspot mode operations, with wireless router capabilities and various web browsing function, the relevant hand and body exposure condition are tested according to the hotspot SAR procedures in KDB 941225. A test separation distance of 10 mm is required between the phantom and all surface and edges with a transmitting antenna located within 25 mm from that surface or edge. When form factor of a handset is smaller than 9cm x 5cm, a test separation distance of 5mm (instead of 10mm) is required for testing hotspot mode. When the separate distance required for body-worn accessory testing is larger than or equal to that tested for hotspot mode, in the same wireless mode and for the same surface of the phone, the hotspot mode SAR data may be used to support body-worn accessory SAR compliance for that particular configuration (surface).





9. Uncertainty

9.1 Measurement Uncertainty

The following measurement uncertainty levels have been estimated for tests performed on the EUT as specified in IEEE 1528: 2013. This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=2$.

SATIMO Uncertainty- SN 08/21 EPG0352									
Measurement uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration	E.2.1	5.72	N	1.00	1.00	1.00	5.72	5.72	∞
Axial Isotropy	E.2.2	0.18	R	1.73	0.71	0.71	0.07	0.07	∞
Hemispherical Isotropy	E.2.2	1.04	R	1.73	0.71	0.71	0.42	0.42	∞
Boundary effect	E.2.3	0.80	R	1.73	1.00	1.00	0.46	0.46	∞
Linearity	E.2.4	1.25	R	1.73	1.00	1.00	0.72	0.72	∞
System detection limits	E.2.4	1.20	R	1.73	1.00	1.00	0.69	0.69	∞
Modulation response	E.2.5	3.42	R	1.73	1.00	1.00	1.97	1.97	∞
Readout Electronics	E.2.6	0.26	N	1.00	1.00	1.00	0.26	0.26	∞
Response Time	E.2.7	0.17	R	1.73	1.00	1.00	0.10	0.10	∞
Integration Time	E.2.8	1.43	R	1.73	1.00	1.00	0.83	0.83	∞
RF ambient conditions-Noise	E.6.1	3.51	R	1.73	1.00	1.00	2.03	2.03	∞
RF ambient conditions-reflections	E.6.1	3.15	R	1.73	1.00	1.00	1.82	1.82	∞
Probe positioner mechanical tolerance	E.6.2	1.20	R	1.73	1.00	1.00	0.69	0.69	∞
Probe positioning with respect to phantom shell	E.6.3	1.40	R	1.73	1.00	1.00	0.81	0.81	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	2.10	R	1.73	1.00	1.00	1.21	1.21	∞
Test sample Related									
Test sample positioning	E.4.2	3.10	N	1.00	1.00	1.00	3.10	3.10	∞
Device holder uncertainty	E.4.1	3.80	N	1.00	1.00	1.00	3.80	3.80	∞
Output power variation—SAR drift measurement	E.2.9	4.50	R	1.73	1.00	1.00	2.60	2.60	∞
SAR scaling	E.6.5	1.80	R	1.73	1.00	1.00	1.04	1.04	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	3.70	R	1.73	1.00	1.00	2.14	2.14	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.90	N	1.00	1.00	0.84	1.90	1.60	∞
Liquid conductivity measurement	E.3.3	2.40	R	1.73	0.78	0.71	1.08	0.98	M
Liquid permittivity measurement	E.3.3	4.10	N	1.00	0.78	0.71	3.20	2.91	M
Liquid conductivity—temperature uncertainty	E.3.4	2.70	R	1.73	0.23	0.26	0.36	0.41	∞
Liquid permittivity—temperature uncertainty	E.3.4	4.80	N	1.00	0.23	0.26	1.10	1.25	∞
Combined Standard Uncertainty			RSS				10.08	9.59	
Expanded Uncertainty (95% Confidence interval)			K=2				19.58	19.18	



SATIMO Uncertainty- SN 08/21 EPGO352									
System Validation uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration	E.2.1	5.72	N	1.00	1.00	1.00	5.72	5.72	∞
Axial Isotropy	E.2.2	0.18	R	1.73	1.00	1.00	0.10	0.10	∞
Hemispherical Isotropy	E.2.2	1.04	R	1.73	0.00	0.00	0.00	0.00	∞
Boundary effect	E.2.3	0.80	R	1.73	1.00	1.00	0.46	0.46	∞
Linearity	E.2.4	1.25	R	1.73	1.00	1.00	0.72	0.72	∞
System detection limits	E.2.4	1.20	R	1.73	1.00	1.00	0.69	0.69	∞
Modulation response	E.2.5	3.42	R	1.73	0.00	0.00	0.00	0.00	∞
Readout Electronics	E.2.6	0.26	N	1.00	1.00	1.00	0.26	0.26	∞
Response Time	E.2.7	0.17	R	1.73	0.00	0.00	0.00	0.00	∞
Integration Time	E.2.8	1.43	R	1.73	0.00	0.00	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3.51	R	1.73	1.00	1.00	2.03	2.03	∞
RF ambient conditions-reflections	E.6.1	3.15	R	1.73	1.00	1.00	1.82	1.82	∞
Probe positioner mechanical tolerance	E.6.2	1.20	R	1.73	1.00	1.00	0.69	0.69	∞
Probe positioning with respect to phantom shell	E.6.3	1.40	R	1.73	1.00	1.00	0.81	0.81	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	2.10	R	1.73	1.00	1.00	1.21	1.21	∞
System validation source									
Deviation of experimental dipole from numerical dipole	E.6.4	4.80	N	1.00	1.00	1.00	4.80	4.80	∞
Input power and SAR drift measurement	8,6.6.4	5.10	R	1.73	1.00	1.00	2.94	2.94	∞
Dipole axis to liquid distance	8,E.6.6	2.40	R	1.73	1.00	1.00	1.39	1.39	∞
Phantom and set-up									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	3.70	R	1.73	1.00	1.00	2.14	2.14	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.90	N	1.00	1.00	0.84	1.90	1.60	∞
Liquid conductivity (temperature uncertainty)	E.3.3	2.40	R	1.73	0.78	0.71	1.08	0.98	∞
Liquid conductivity(measured)	E.3.3	4.10	N	1.00	0.78	0.71	3.20	2.91	M
Liquid permittivity(temperature uncertainty)	E.3.4	2.70	R	1.73	0.23	0.26	0.36	0.41	∞
Liquid permittivity (measured)	E.3.4	4.80	N	1.00	0.23	0.26	1.10	1.25	M
Combined Standard Uncertainty			RSS				9.72	9.52	
Expanded Uncertainty (95% Confidence interval)			K=2				19.44	19.03	



SATIMO Uncertainty- SN 08/21 EPG0352									
° System Check uncertainty for DUT averaged over 1 gram / 10 gram.									
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System									
Probe calibration drift	E.2.1.3	5.72	N	1.00	1.00	1.00	5.72	5.72	∞
Axial Isotropy	E.2.2	0.18	R	1.73	0.00	0.00	0.00	0.00	∞
Hemispherical Isotropy	E.2.2	1.04	R	1.73	0.00	0.00	0.00	0.00	∞
Boundary effect	E.2.3	0.8	R	1.73	0.00	0.00	0.00	0.00	∞
Linearity	E.2.4	1.25	R	1.73	0.00	0.00	0.00	0.00	∞
System detection limits	E.2.4	1.20	R	1.73	0.00	0.00	0.00	0.00	∞
Modulation response	E.2.5	3.42	R	1.73	0.00	0.00	0.00	0.00	∞
Readout Electronics	E.2.6	0.26	N	1.00	0.00	0.00	0.00	0.00	∞
Response Time	E.2.7	0.17	R	1.73	0.00	0.00	0.00	0.00	∞
Integration Time	E.2.8	1.43	R	1.73	0.00	0.00	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3.51	R	1.73	0.00	0.00	0.00	0.00	∞
RF ambient conditions-reflections	E.6.1	3.15	R	1.73	0.00	0.00	0.00	0.00	∞
Probe positioner mechanical tolerance	E.6.2	1.2	R	1.73	1.00	1.00	0.69	0.69	∞
Probe positioning with respect to phantom shell	E.6.3	1.4	R	1.73	1.00	1.00	0.81	0.81	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	3.9	R	1.73	0.00	0.00	0.00	0.00	∞
System check source (dipole)									
Deviation of experimental dipoles	E.6.4	4.8	N	1.00	1.00	1.00	4.80	4.80	∞
Input power and SAR drift measurement	8,6.6.4	5.1	R	1.73	1.00	1.00	2.94	2.94	∞
Dipole axis to liquid distance	8,E.6.6	2.4	R	1.73	1.00	1.00	1.39	1.39	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	3.7	R	1.73	1.00	1.00	2.14	2.14	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1.00	1.00	0.84	1.90	1.60	∞
Liquid conductivity measurement	E.3.3	2.4	R	1.73	0.78	0.71	1.08	0.98	∞
Liquid permittivity measurement	E.3.3	4.1	N	1.00	0.78	0.71	3.20	2.91	M
Liquid conductivity—temperature uncertainty	E.3.4	2.7	R	1.73	0.23	0.26	0.36	0.41	∞
Liquid permittivity—temperature uncertainty	E.3.4	4.8	N	1.00	0.23	0.26	1.10	1.25	M
Combined Standard Uncertainty			RSS				5.56	5.20	
Expanded Uncertainty (95% Confidence interval)			K=2				11.12	10.41	



10. Conducted Power Measurement

10.1 Test Result

LTE Conducted Power

General Note:

1. Anritsu CMW500 base station simulator was used to setup the connection with EUT; the frequency band, channel bandwidth, RB allocation configuration, modulation type are set in the base station simulator to configure EUT transmitting at maximum power and at different configurations which are requested to be reported to FCC, for conducted power measurement and SAR testing.
2. Per KDB 941225 D05, when a properly configured base station simulator is used for the SAR and power measurements, spectrum plots for each RB allocation and offset configuration is not required.
3. Per KDB 941225 D05, start with the largest channel bandwidth and measure SAR for QPSK with 1 RB allocation, using the RB offset and required test channel combination with the highest maximum output power for RB offsets at the upper edge, middle and lower edge of each required test channel.
4. Per KDB 941225 D05, 50% RB allocation for QPSK SAR testing follows 1RB QPSK allocation procedure.
5. Per KDB 941225 D05, For QPSK with 100% RB allocation, SAR is not required when the highest maximum output power for 100 % RB allocation is less than the highest maximum output power in 50% and 1 RB allocations and the highest reported SAR for 1 RB and 50% RB allocation are ≤ 0.8 W/kg. Otherwise, SAR is measured for the highest output power channel; and if the reported SAR is > 1.45 W/kg, the remaining required test channels must also be tested.
6. Per KDB 941225 D05, 16QAM output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in QPSK and the reported SAR for the QPSK configuration is ≤ 1.45 W/kg; Per KDB 941225 D05, 16QAM SAR testing is not required.
7. Per KDB 941225 D05, Smaller bandwidth output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in the largest supported bandwidth, and the reported SAR for the largest supported bandwidth is ≤ 1.45 W/kg; Per KDB 941225 D05, smaller bandwidth SAR testing is not required.



LTE BAND 7

LTE Band 7 Maximum Average Power [dBm]						
BW [MHz]	RB Size	RB Offset	Mod	Lowest	Middle	Highest
5	1	0	QPSK	19.45	19.33	20.05
5	1	13		19.23	19.38	20.00
5	1	24		19.16	19.35	20.08
5	12	0		18.22	18.41	19.08
5	12	6		18.17	18.43	19.09
5	12	13		18.15	18.52	19.06
5	25	0		18.17	18.45	18.96
5	1	0	16-QAM	17.52	18.61	19.12
5	1	13		17.43	18.62	19.13
5	1	24		17.51	18.66	19.13
5	12	0		17.32	17.54	18.16
5	12	6		17.32	17.59	18.18
5	12	13		17.37	17.59	18.27
5	25	0		17.41	17.68	18.19
10	1	0	QPSK	19.12	19.49	19.96
10	1	25		19.13	19.55	20.10
10	1	49		19.19	19.68	20.04
10	25	0		18.14	18.43	18.95
10	25	13		18.13	18.55	19.09
10	25	25		18.20	18.41	18.95
10	50	0		18.12	18.50	19.14
10	1	0	16-QAM	18.64	17.97	19.02
10	1	25		18.62	18.01	19.17
10	1	49		18.67	18.04	19.23
10	25	0		17.35	17.68	18.13
10	25	13		17.41	17.77	18.27
10	25	25		17.34	17.74	18.26
10	50	0		17.41	17.60	18.33



LTE BAND 7

LTE Band 7 Maximum Average Power [dBm]						
BW [MHz]	RB Size	RB Offset	Mod	Lowest	Middle	Highest
15	1	0	QPSK	19.14	19.17	19.68
15	1	38		19.12	19.40	19.87
15	1	74		19.13	19.46	20.03
15	36	0		18.22	18.50	18.90
15	36	18		18.11	18.51	18.99
15	36	39		18.32	18.60	18.98
15	75	0		18.09	18.59	18.92
15	1	0	16-QAM	18.54	19.26	19.03
15	1	38		18.53	19.33	19.25
15	1	74		18.43	19.55	19.35
15	36	0		17.38	17.55	18.06
15	36	18		17.36	17.64	18.16
15	36	39		17.46	17.66	18.30
15	75	0		17.36	17.70	18.12
20	1	0	QPSK	19.28	19.39	19.59
20	1	50		19.14	19.35	19.75
20	1	99		19.35	19.59	19.99
20	50	0		18.14	18.40	18.83
20	50	25		18.15	18.37	18.87
20	50	50		18.14	18.51	19.11
20	100	0		18.26	18.45	18.80
20	1	0	16-QAM	19.02	18.96	18.69
20	1	50		19.01	19.08	18.87
20	1	99		19.06	19.24	19.09
20	50	0		17.34	17.74	18.06
20	50	25		17.33	17.77	18.15
20	50	50		17.29	17.82	18.34
20	100	0		17.39	17.51	18.06

11. EUT and Test Setup Photo

11.1 EUT Photo

Front side



Back side

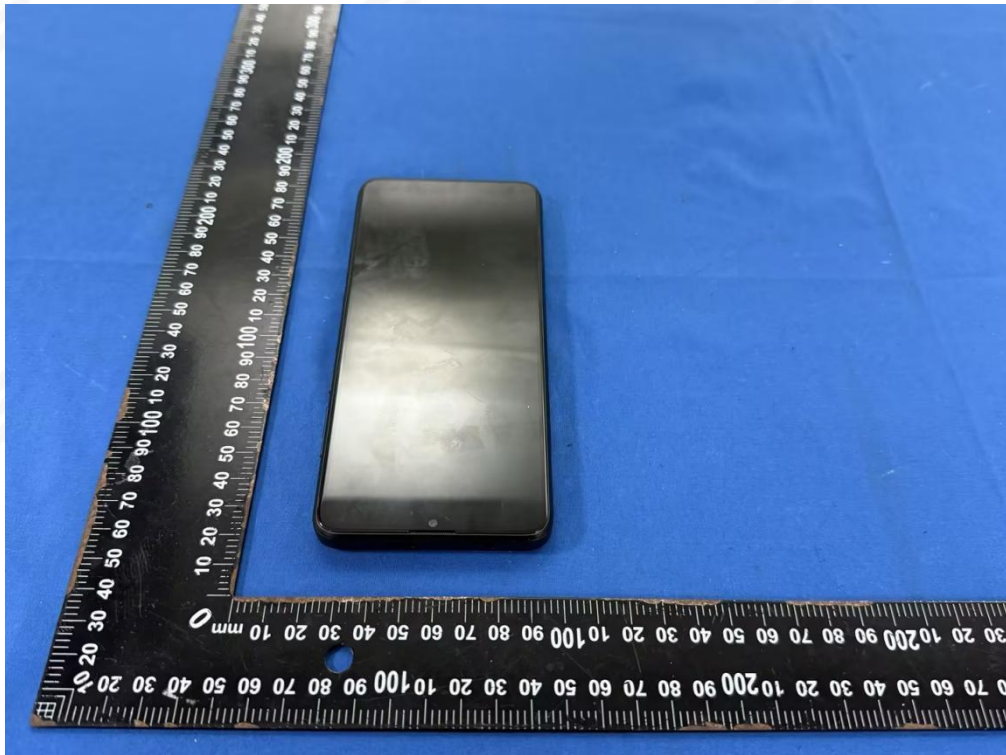




Top side



Bottom side



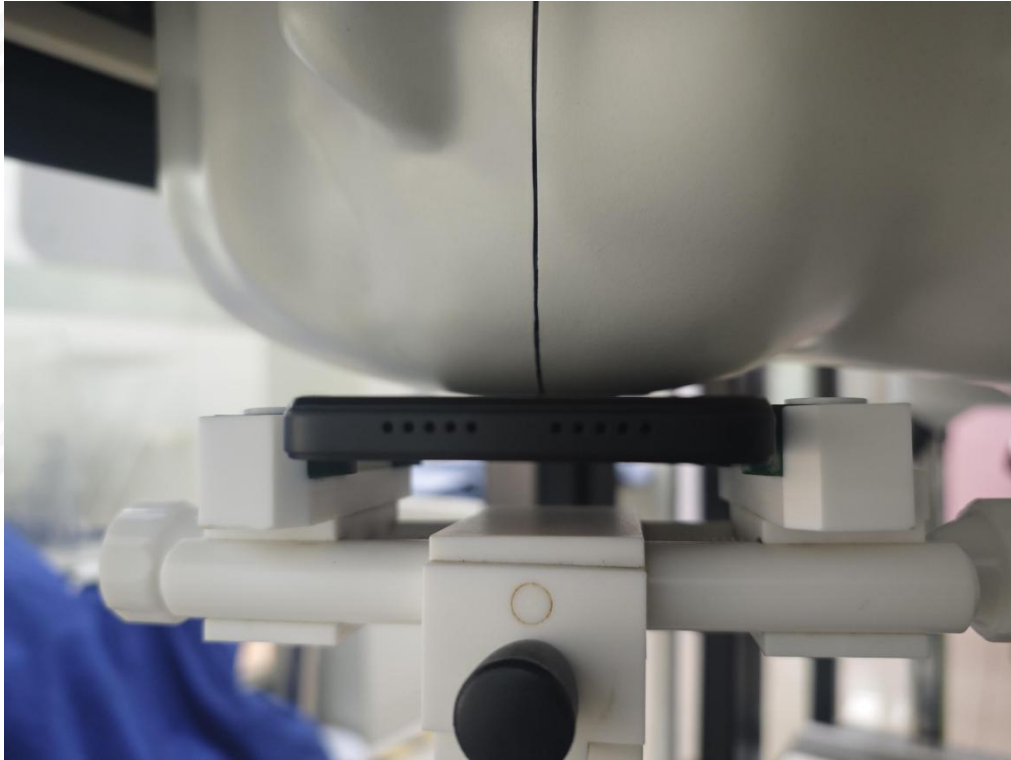
Left side



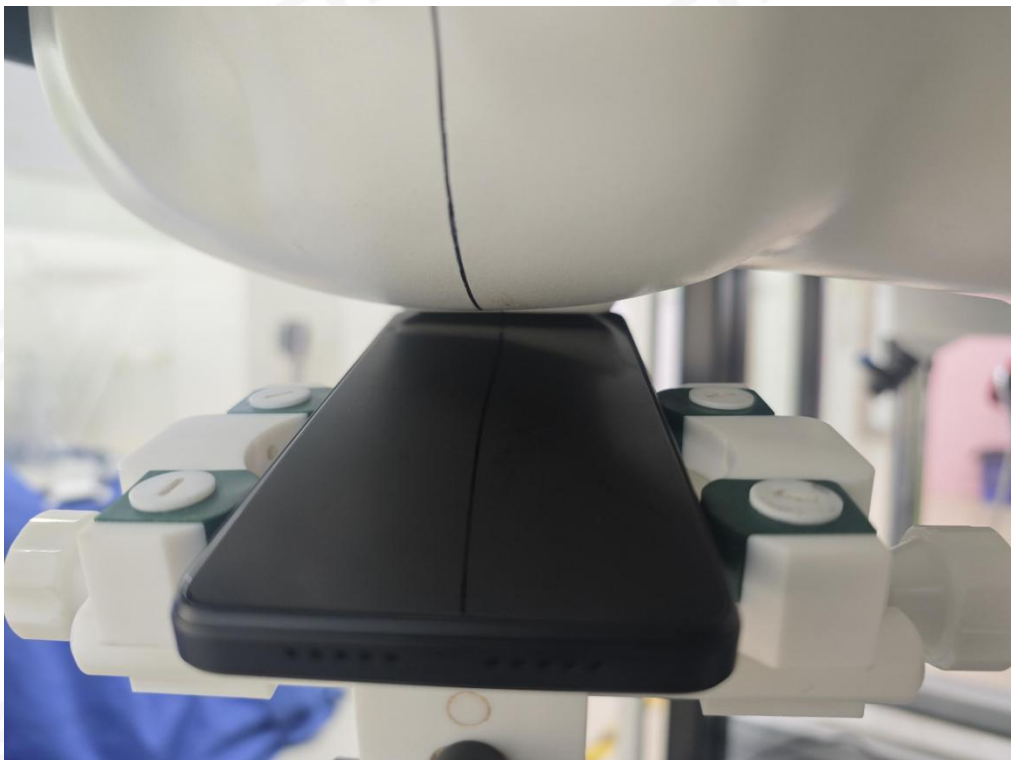
Right side



Right Touch



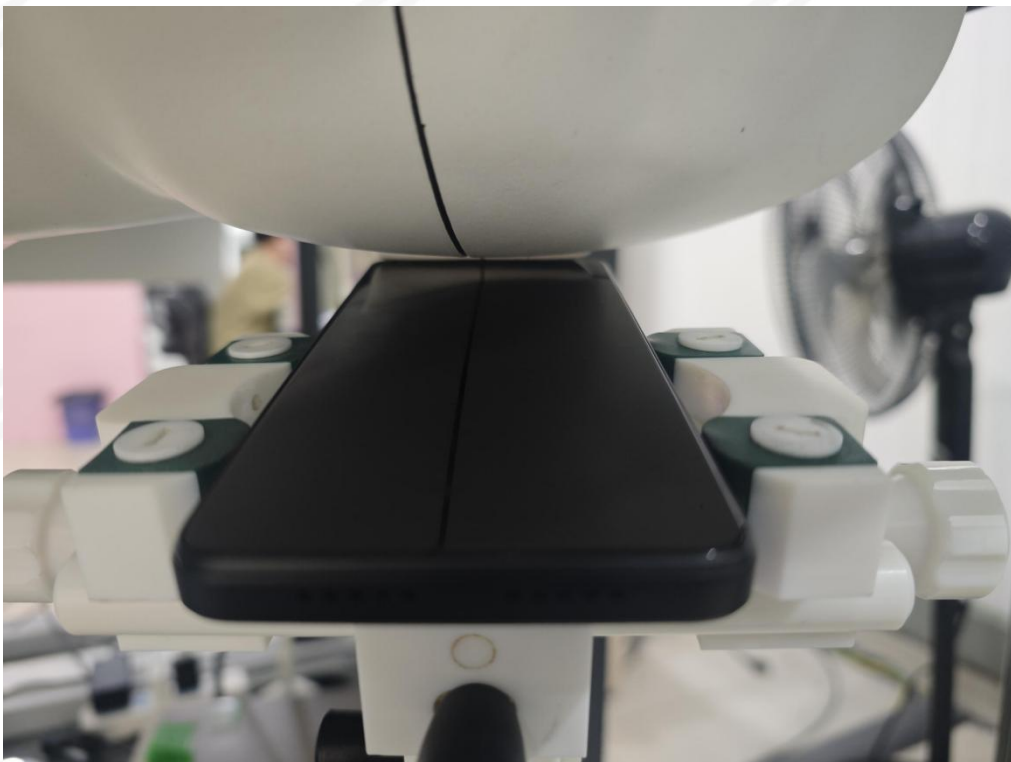
Right Tilt



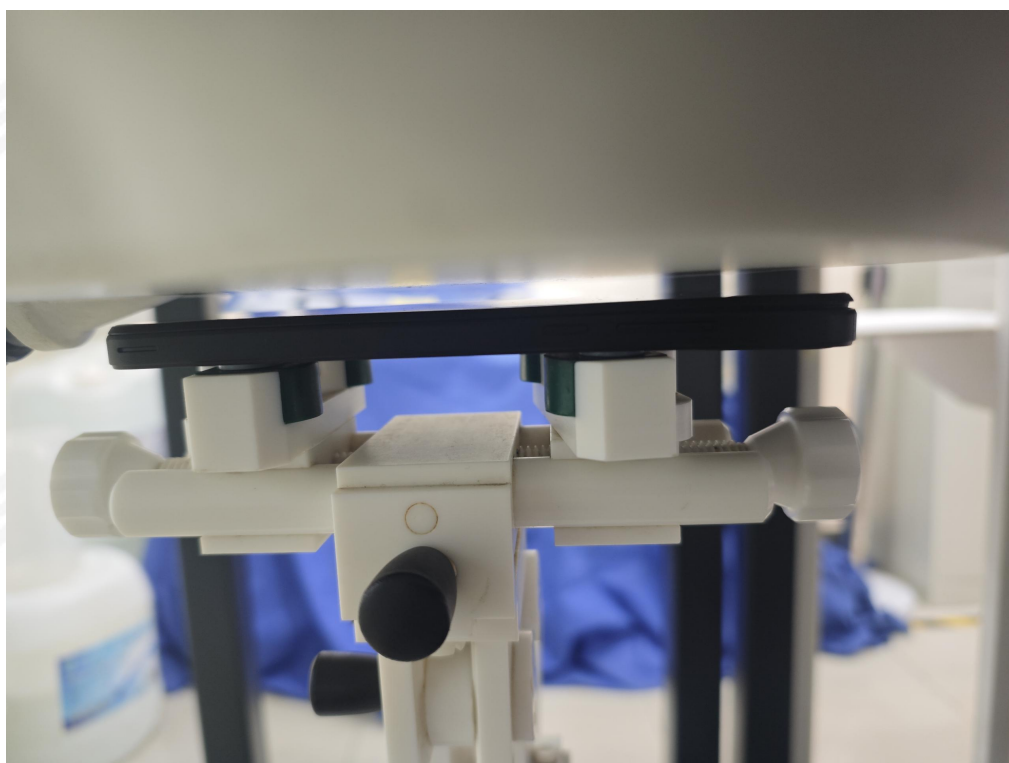
Left Touch



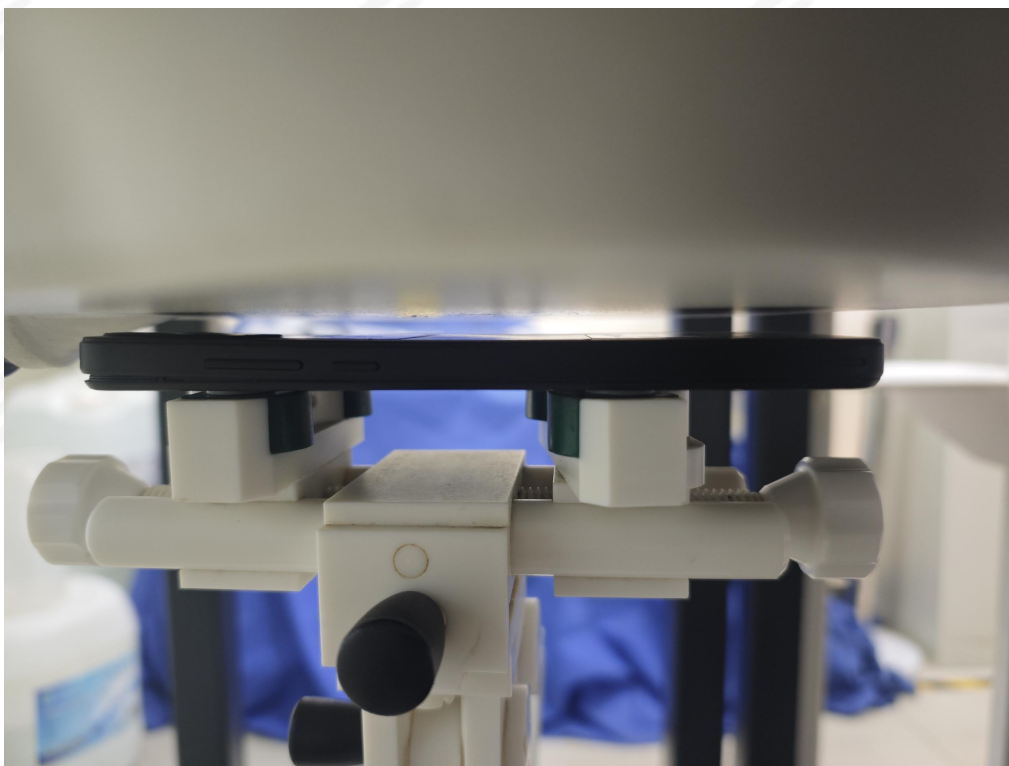
Left Tilt



Body Front side(separation distance is 5mm)



Body Back side(separation distance is 5mm)



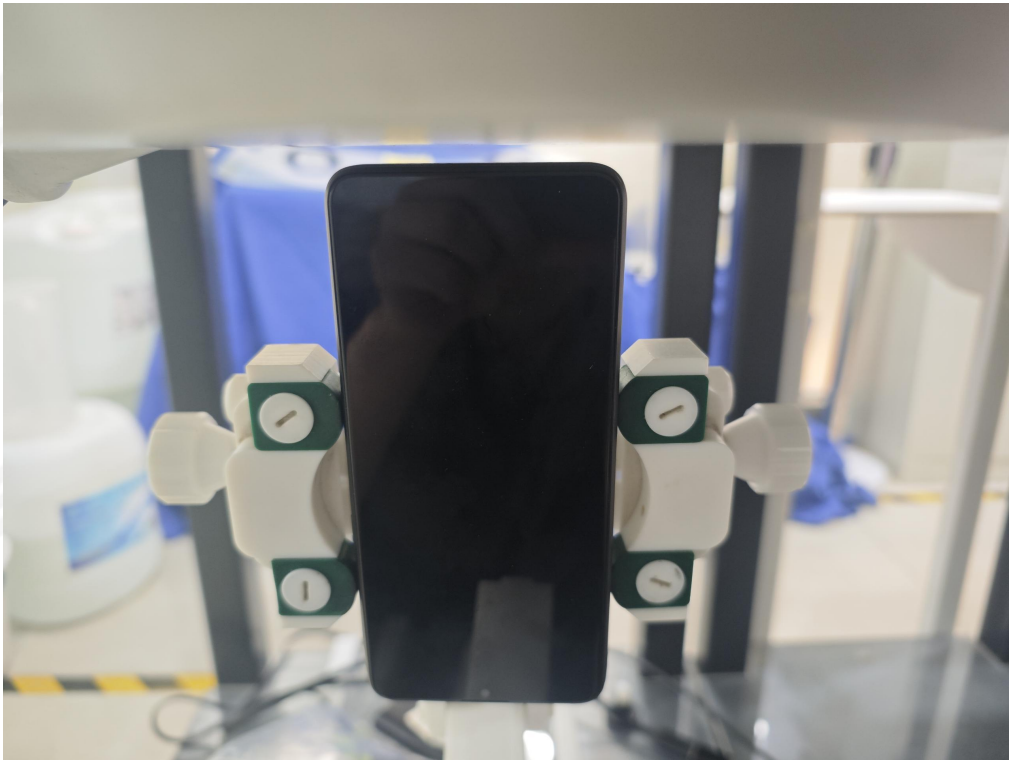
Body Left side(separation distance is 5mm)



Body Right side(separation distance is 5mm)



Body Bottom side(separation distance is 5mm)

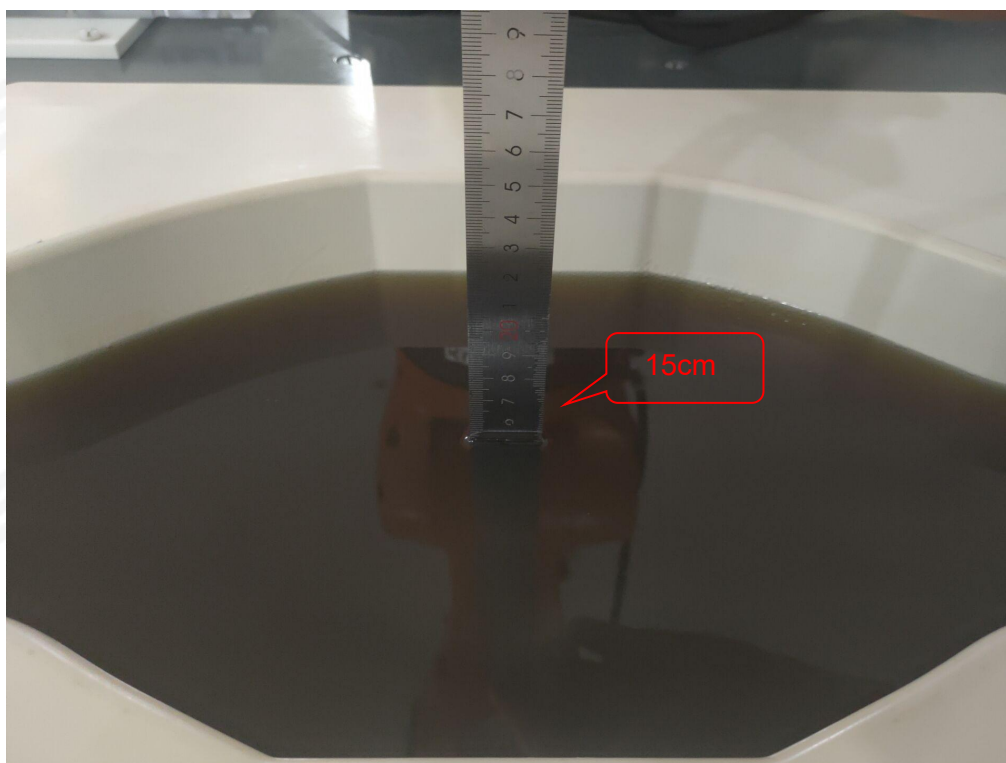


Body Top side(separation distance is 5mm)





Liquid depth (15 cm)





12. SAR Result Summary

12.1 Head SAR

Band	BW (MHz)	Mod.	RB Size	RB offset	Test Position	Freq.	Result 1g (W/Kg)	Power Drift(%)	Meas.O utput Power(d Bm)	Max.Tur n-up Power(d Bm)	Scaled SAR (W/Kg)	Meas.N o.
LTE Band 7	20M	QPSK	1	50	Left Cheek	2560	0.254	-2.96	19.99	20.00	0.255	/
			50	50	Left Cheek	2560	0.246	1.66	19.91	20.00	0.251	/
			1	50	Left Tilt	2560	0.126	-2.31	19.99	20.00	0.126	/
			50	50	Left Tilt	2560	0.118	2.53	19.91	20.00	0.120	/
			1	50	Right Cheek	2560	0.272	-2.44	19.99	20.00	0.273	1
			50	50	Right Cheek	2560	0.264	0.89	19.91	20.00	0.270	/
			1	50	Right Tilt	2560	0.135	3.91	19.99	20.00	0.135	/
			50	50	Right Tilt	2560	0.127	-3.56	19.91	20.00	0.130	/

Note:

- Per KDB 447498 D04, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - Scaled SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
- Per KDB 865664 D01, Repeated measurement is not required when the original highest measured SAR is <0.80 W/kg

**12.2 Body-worn and Hotspot SAR**

Band	BW (MHz)	Mod.	RB Size	RB offset	Test Position	Freq.	Result 1g (W/Kg)	Power Drift(%)	Meas. Output Power (dBm)	Max. Tune-up Power (dBm)	Scaled SAR (W/Kg)	Meas. No.
LTE Band 7	20M	QPSK	1	50	Front side	2560	0.392	2.80	19.99	20.00	0.393	/
			50	50	Front side	2560	0.354	3.37	19.91	20.00	0.361	/
			1	50	Back Side	2560	0.425	0.57	19.99	20.00	0.426	2
			50	50	Back Side	2560	0.378	-2.04	19.91	20.00	0.386	/
			1	50	Right Side	2560	0.239	3.29	19.99	20.00	0.240	/
			50	50	Right Side	2560	0.201	1.79	19.91	20.00	0.205	/
			1	50	Bottom Side	2560	0.287	2.92	19.99	20.00	0.288	/
			50	50	Bottom Side	2560	0.236	-2.06	19.91	20.00	0.241	/

Note:

- The test separation of all above table is 5mm.
- Per KDB 447498 D04, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - Scaled SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
- When the user enables the personal Wireless router functions for the handsets, actual operations include simultaneous transmission of both the Wi-Fi transmitting frequency and thus cannot be evaluated for SAR under actual use conditions. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.



13. Equipment List

Kind of Equipment	Manufacturer	Type No.	Serial No.	Last Calibration	Calibrated Until
2600MHz Dipole	MVG	SID2600	SN 30/14 DIP2G600-336	2023.07.04	2026.07.03
E-Field Probe	MVG	SSE2	SN 08/21 EPO352	2024.09.18	2025.09.17
Dielectric Probe Kit	MVG	SCLMP	SN 32/14 OCPG67	2024.09.18	2025.09.17
Antenna	MVG	ANTA3	SN 07/13 ZNTA52	N/A	N/A
Phantom1	MVG	SAM	SN 32/14 SAM115	N/A	N/A
Phantom3	MVG	SAM	SN 21/21 ELLI48	N/A	N/A
Phone holder	MVG	N/A	SN 32/14 MSH97	N/A	N/A
Laptop holder	MVG	N/A	SN 32/14 LSH29	N/A	N/A
Attenuator	Agilent	HXT-10-8-SMA	240327017	2025-02-22	2026-02-21
Directional coupler	Xi'an Xingbo	XBOH-OA08-20 dB	211123-4-3	2025-02-22	2026-02-21
Network Analyzer	Agilent	E5071C	MY46520378	2024-09-25	2025-09-26
Multi Meter	Keithley	Multi Meter 2000	4050073	2024-09-25	2025-09-26
Signal Generator	Agilent	N5182A	MY50140530	2024-09-25	2025-09-26
Wireless Communication Test Set	R&S	CMW500	156324	2024-09-25	2025-09-26
Power Amplifier	DESAY	ZHL-42W	9638	2024-09-25	2025-09-26
Power Meter	R&S	NRP	100510	2024-09-25	2025-09-26
Power Sensor	R&S	NRP-Z11	101919	2024-09-25	2025-09-26
Power Sensor	Keysight	U2021XA	MY56280002	2024-09-25	2025-09-26
Temperature hygrometer	SuWei	SW-108	N/A	2024.10.15	2025.10.14
Thermograph	Elitech	RC-4	S/N EF7176501537	2024.10.15	2025.10.14



Appendix A. System Validation Plots

System Performance Check Data(2600MHz)

Type: Phone measurement (Complete)

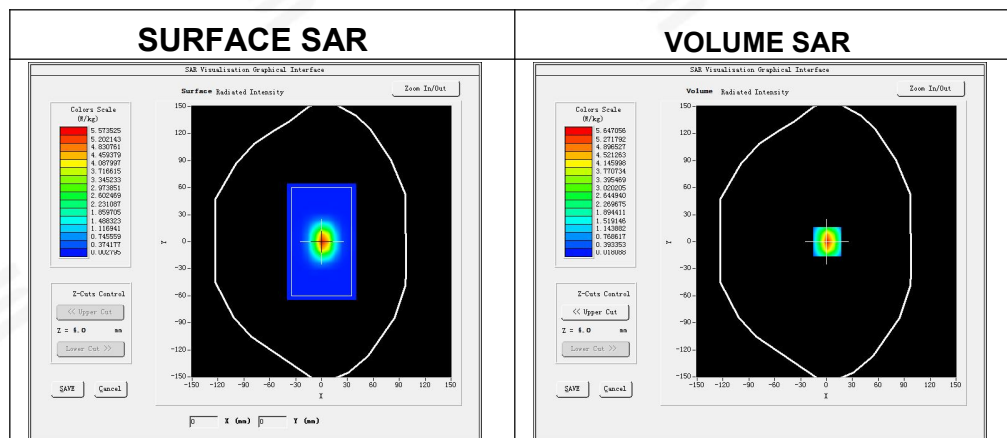
Area scan resolution: dx=8mm,dy=8mm

Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2025-03-14

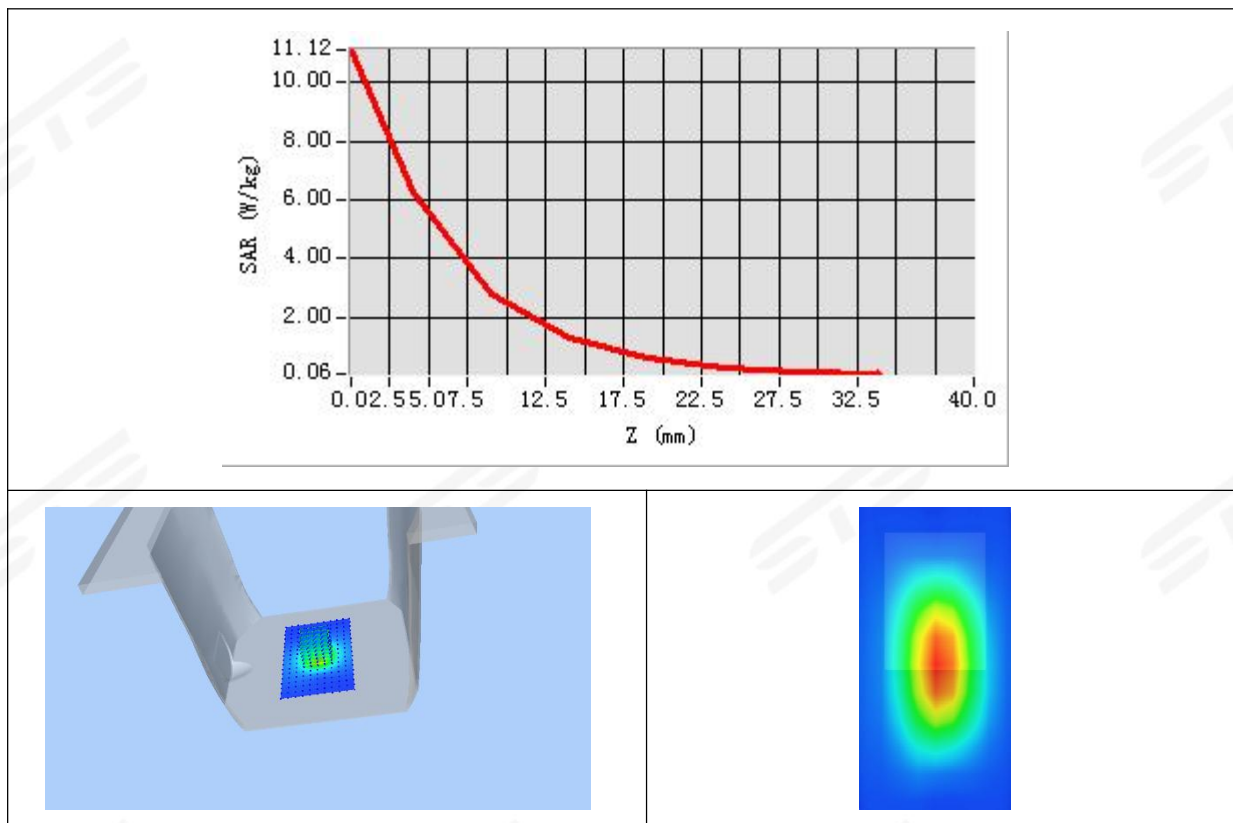
Experimental conditions.

Phantom	Validation plane
Device Position	Dipole
Band	2600MHz
Channels	Middle
Signal	CW
Frequency (MHz)	2600
Relative permittivity	38.54
Conductivity (S/m)	1.92
Probe	SN 08/21 EPGO352
ConvF	1.74
Crest factor:	1:1



Maximum location: X=1.00, Y=0.00

SAR 10g (W/Kg)	2.598747
SAR 1g (W/Kg)	5.498411



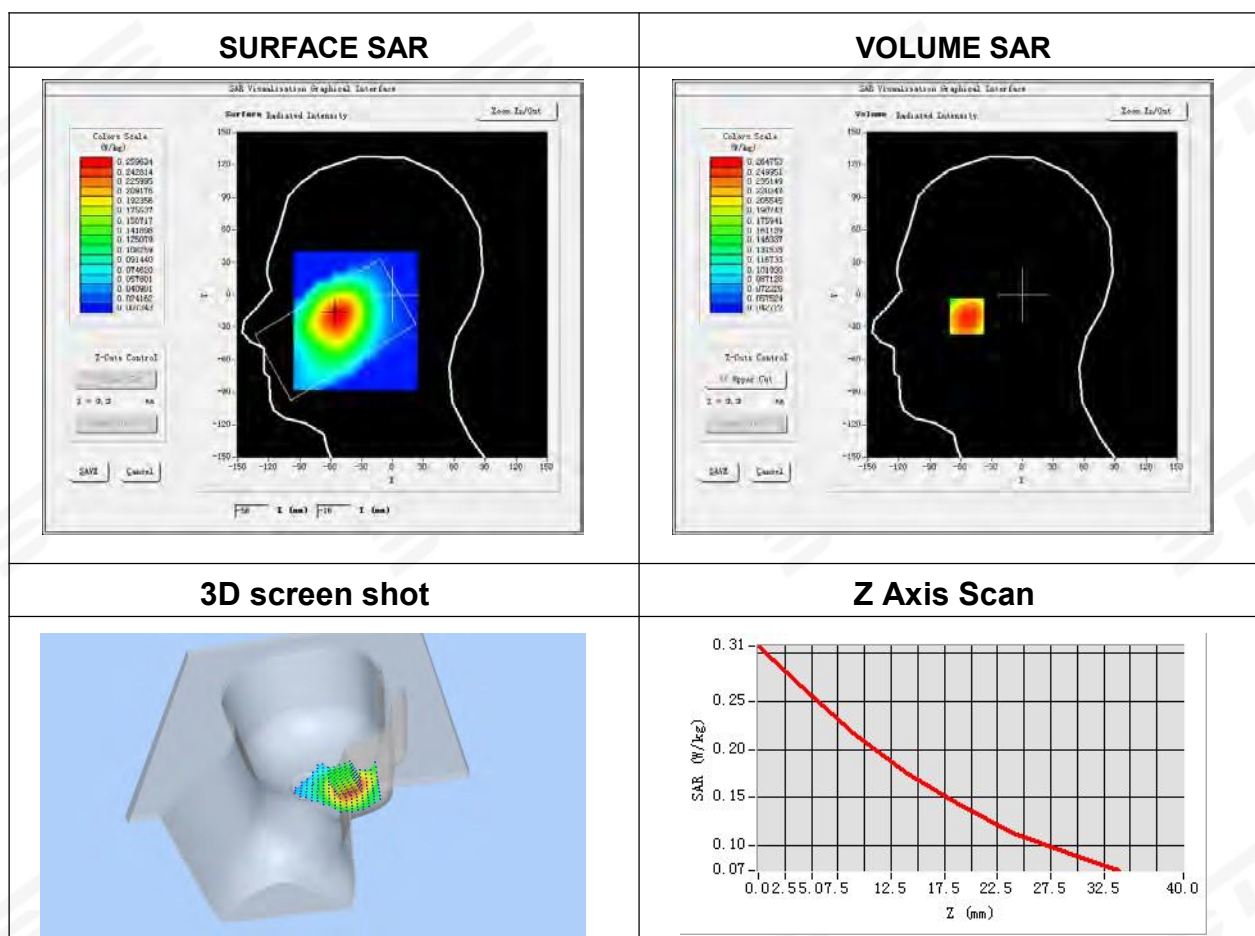
**Appendix B. SAR Test Plots****Plot 1: DUT: Smart Phone; EUT Model: A65L**

Test Date	2025-03-14
ConvF	1.74
Probe	SN 08/21 EPGO352
Area Scan	dx=8mm, dy=8mm, h= 5.00 mm
Zoom Scan	5x5x7, dx=8mm, dy=8mm, dz=5mm
Phantom	Right Cheek
Device Position	Cheek
Band	LTE Band 7 (RB 1)
Signal	LTE (Crest factor: 1.0)
Frequency (MHz)	2560
Relative permittivity (real part)	40.04
Conductivity (S/m)	1.89

Maximum location: X=-54.00, Y=-19.00

SAR Peak: 0.31 W/kg

SAR 10g (W/Kg)	0.195349
SAR 1g (W/Kg)	0.272344





Plot 2: DUT: Smart Phone; EUT Model: A65L

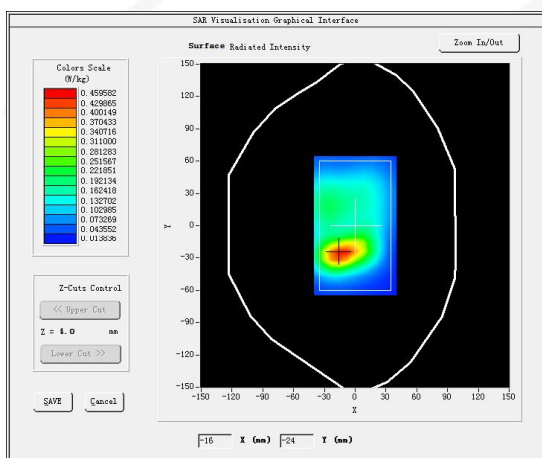
Test Date	2025-03-14
ConvF	1.74
Probe	SN 08/21 EPGO352
Area Scan	dx=8mm, dy=8mm, h= 5.00 mm
Zoom Scan	5x5x7, dx=8mm, dy=8mm, dz=5mm
Phantom	Validation plane
Device Position	Back Side
Band	LTE Band 7 (RB 1)
Signal	LTE (Crest factor: 1.0)
Frequency (MHz)	2560
Relative permittivity (real part)	40.04
Conductivity (S/m)	1.89

Maximum location: X=-15.00, Y=-26.00

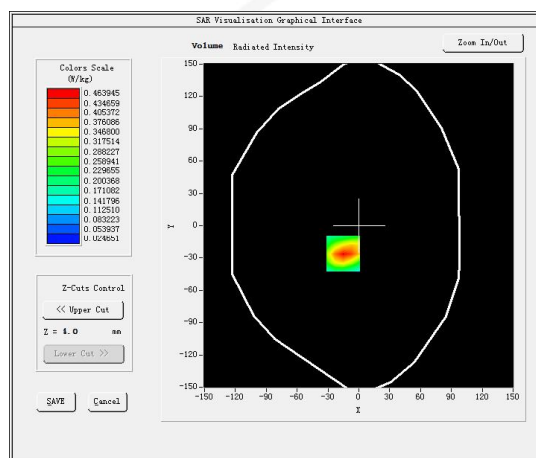
SAR Peak: 0.66 W/kg

SAR 10g (W/Kg)	0.249619
SAR 1g (W/Kg)	0.425255

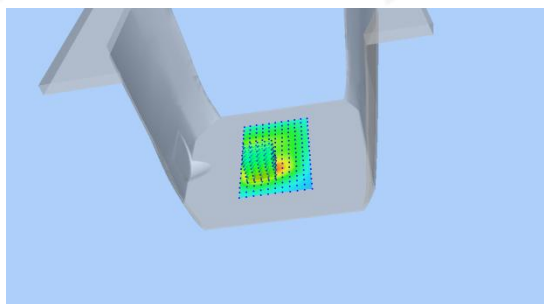
SURFACE SAR



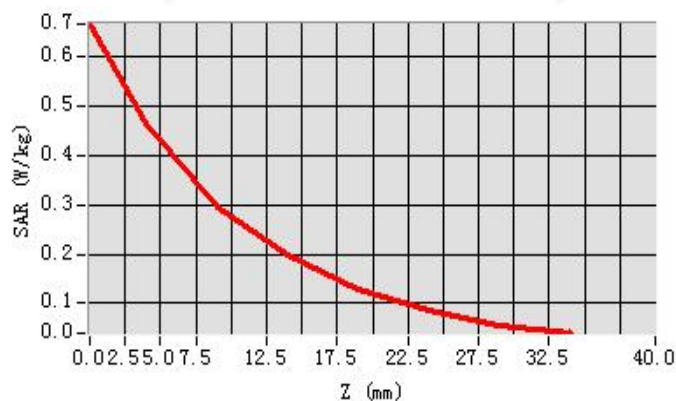
VOLUME SAR



3D screen shot



Z Axis Scan





Appendix C. Probe Calibration and Dipole Calibration Report

Refer the appendix Calibration Report.

※※※※END OF THE REPORT※※※※