TEST REPORT

Applicant Name:	Shenzhen Retevis Technology Co., Ltd.
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Report Number:	2501T61540E-SAA
FCC ID:	2ASNSRM15

Test Standard (s)

FCC 47 CFR part 2.1093

Sample Description

Product Name:	Two Way Radio
Model No.:	RM15
Multiple Model(s) No.:	RA26, RM22
Trade Mark:	RETEVIS
Serial Number:	33J6-1
Date Received:	2025/07/16
Date of Test:	2025/08/15
Issue Date:	2025/09/01

Test Result:	Pass▲

▲In the configuration tested, the EUT complied with the standards above.

Prepared and Checked By:

Bob Lu

Bob Lu
SAR Engineer

Approved By:

Luke Jiang

Luke Jiang
SAR Engineer

Note: The information marked#is provided by the applicant, the laboratory is not responsible for its authenticity and this information can affect the validity of the result in the test report. Customer model name, addresses, names, trademarks etc. are included.

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Attestation of Test Results			
Frequency Band	**Max. SAR Level(s) Reported(W/kg)**		**Limit(W/Kg)**
PTT (156.05-157.425MHz)	1g Head SAR	**0.91**	**8.0**
	1g Body SAR	**0.79**	
Applicable Standards	**FCC 47 CFR part 2.1093** Radiation exposure evaluation: portable devices		
	RF Exposure Procedures: TCB Workshop April 2019		
	IEEE 1528:2013 IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques		
	KDB procedures 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 643646 D01 SAR Test for PTT Radios v01r03		
Note: This wireless device has been shown to be capable of compliance for localized specific absorption rate (SAR) for Occupational /Controlled Exposure limits specified in **FCC 47 CFR part 2.1093** and has been tested in accordance with the measurement procedures specified in IEEE 1528-2013 and RF exposure KDB procedures. **The results and statements contained in this report pertain only to the device(s) evaluated.**			

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	2501T61540E-SAA	Original Report	2025/09/01

EUT DESCRIPTION

This report has been prepared on behalf of **Shenzhen Retevis Technology Co., Ltd.** and their product **Two Way Radio**, Test Model: **RM15,** FCC ID: **2ASNSRM15** or the EUT (Equipment under Test) as referred to in the rest of this report.

**All measurement and test data in this report was gathered from production sample serial number: 33J6-1 (Assigned by BACL, Shenzhen). The EUT supplied by the applicant was received on 2025/07/16.*

Technical Specification

Product Type:	Portable
Exposure Category:	Occupational /Controlled Exposure
Antenna Type(s):	External Antenna
Body-Worn Accessories:	Belt Clip, Headset
Proximity Sensor:	None
Operation modes:	PTT_FM 25kHz
Frequency Band:	PTT_FM 25kHz: 156.05-157.425MHz
Rated Input Voltage:	DC 7.4V from Rechargeable Battery
Normal Operation:	Face Up and Body
EUT Received Status:	Good
Note: The Multiple models are electrically identical with the test model except for model name and sales channels. Please refer to the declaration letter# for more detail, which was provided by manufacturer.	

REFERENCE, STANDARDS, AND GUILDELINES

FCC:

The Report and Order requires routine SAR evaluation prior to equipment authorization of portable transmitter devices, including portable telephones. For consumer products, the applicable limit is 1.6 mW/g as recommended by the ANSI/IEEE standard C95.1-1992 [6] for an uncontrolled environment (Paragraph 65). According to the Supplement C of OET Bulletin 65 “Evaluating Compliance with FCC Guide-lines for Human Exposure to Radio frequency Electromagnetic Fields", released on Jun 29, 2001 by the FCC, the device should be evaluated at maximum output power (radiated from the antenna) under “worst-case” conditions for normal or intended use, incorporating normal antenna operating positions, device peak performance frequencies and positions for maximum RF energy coupling.

This report describes the methodology and results of experiments performed on wireless data terminal. The objective was to determine if there is RF radiation and if radiation is found, what is the extent of radiation with respect to safety limits. SAR (Specific Absorption Rate) is the measure of RF exposure determined by the amount of RF energy absorbed by human body (or its parts) – to determine how the RF energy couples to the body or head which is a primary health concern for body worn devices. The limit below which the exposure to RF is considered safe by regulatory bodies in North America is 1.6 mW/g average over 1 gram of tissue mass.

SAR Limits

FCC Limit (1g Tissue)

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	1.6	**8.0**
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

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

Occupational/Controlled Environments are defined as locations where there is exposure that maybe incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

Occupational/Controlled Environments Spatial Peak limit 8.0W/kg for 1g SAR applied to the EUT.

FACILITIES

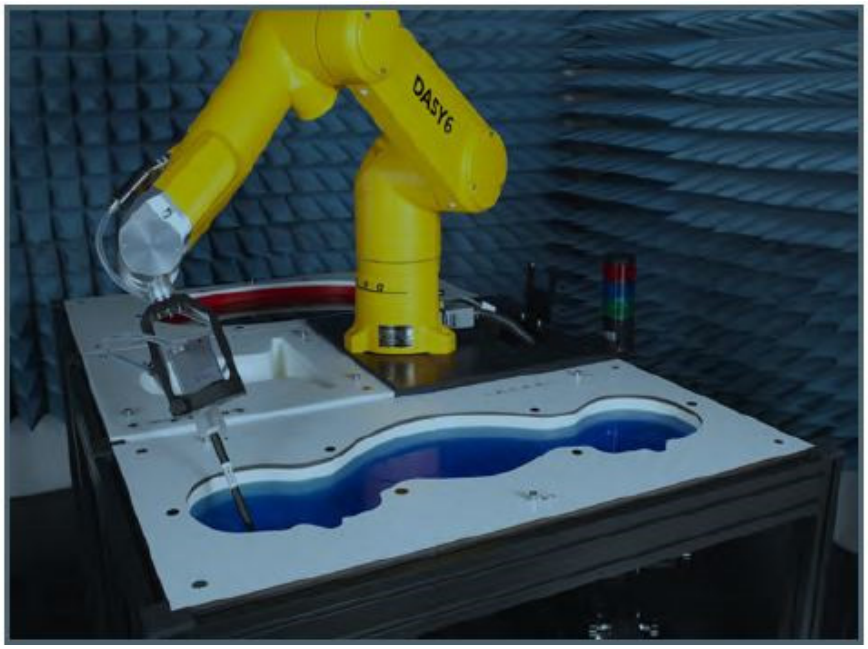
The test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect data is located at 5F(B-West) ,6F,7F,the 3rd Phase of Wan Li Industrial Building D,Shihua Rd, FuTian Free Trade Zone, Shenzhen, China

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No.: 715558, the FCC Designation No.: CN5045.

Each test item follows test standards and with no deviation.

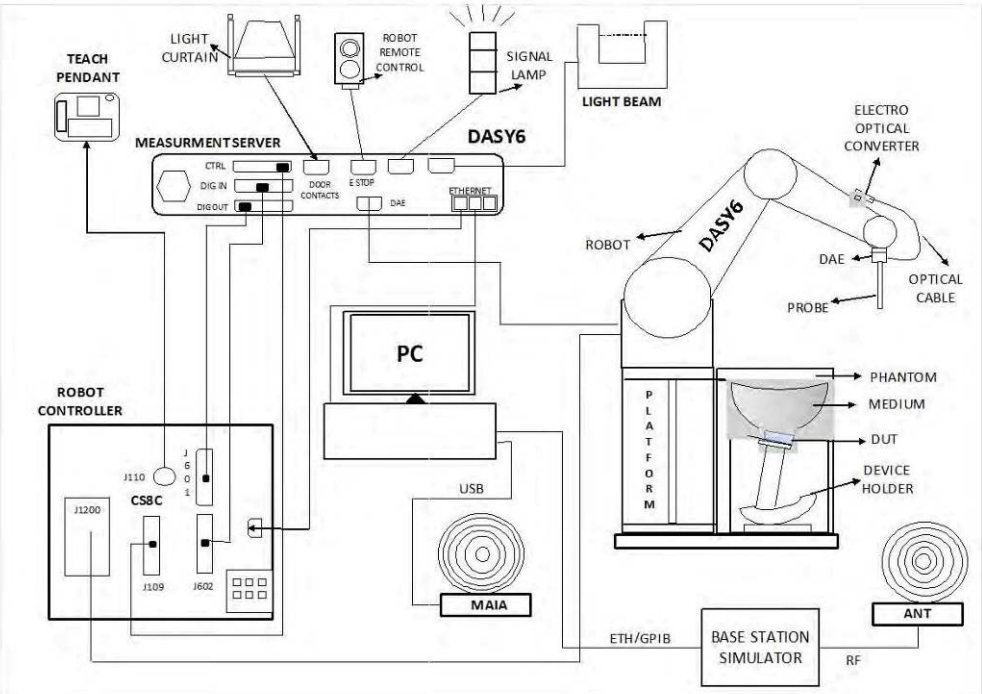
DESCRIPTION OF TEST SYSTEM

These measurements were performed with the automated near-field scanning system DASY6 from Schmid & Partner Engineering AG (SPEAG) which is the Fifth generation of the system shown in the figure hereinafter:



DASY6 System Description

The DASY6 system for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot (Staubli TX=RX family) 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 application, 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 Win7 professional operating system and the DASY52 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.

DASY6 Measurement Server

The DASY6 measurement server is based on a PC/104 CPU board with a 400 MHz Intel ULV Celeron, 128 MB chip-disk and 128 MB RAM. The necessary circuits for communication with the DAE4 (or DAE3) electronics box, as well as the 16-bit AD converter system for optical detection and digital I/O interface are contained on the DASY6 I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all real-time data evaluations of field measurements and surface detection, controls robot movements, and handles safety operations. The PC operating system cannot interfere with these time-critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program- controlled robot movements. Furthermore, the measurement server is equipped with an expansion port, which is reserved for future applications. Please note that this expansion port does not have a standardized pinout, and therefore only devices provided by SPEAG can be connected. Connection of devices from any other supplier could seriously damage the measurement server.

Data Acquisition Electronics

The data acquisition electronics (DAE4) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.

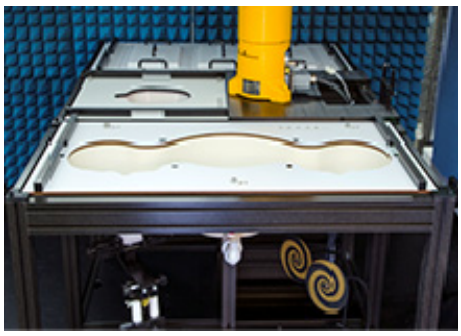
The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of both the DAE4 as well as of the DAE3 box is 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

ES3DV2 E-Field Probes

Frequency	10 MHz - 4 GHz Linearity: ± 0.2 dB (30 MHz to 4 GHz)
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)
Dynamic Range	5 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: 3.9 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 2.0 mm
Application	General dosimetry up to 4 GHz Dosimetry in strong gradient fields Compliance tests of mobile phones
Compatibility	DASY3, DASY4, DASY52, DASY6, DASY8 SAR, EASY6, EASY4/MRI

SAM Twin Phantom



The SAM Twin Phantom (shown in front of DASY6) is a fiberglass shell phantom with shell thickness 2 mm, except in the ear region where the thickness is increased to 6 mm. The phantom has three measurement areas: 1) Left Head, 2) Right Head, and 3) Flat Section. For larger devices, the use of the ELI-Phantom (shown behind DASY6) is required. For devices such as glasses with a wireless link, the Face Down Phantom is the most suitable (between the SAM Twin and ELI phantoms).

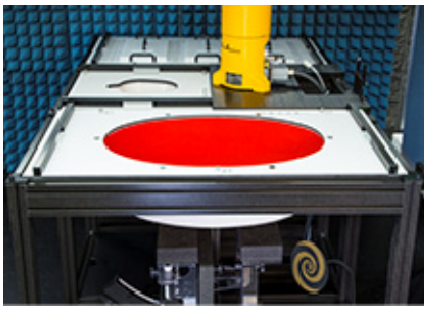
When the phantom is mounted inside allocated slot of the DASY6 platform, phantom reference points can be taught directly in the DASY5 V5.2software. When the DASY6 platform is used to mount the

Phantom, some of the phantom teaching points cannot be reached by the robot in DASY5 V5.2. A special tool called P1a-P2aX-Former is provided to transform two of the three points, P1 and P2, to reachable locations. To use these new teaching points, a revised phantom configuration file is required.
In addition to our standard broadband liquids, the phantom can be used with the following tissue simulating liquids:

Sugar-water-based liquids can be left permanently in the phantom. Always cover the liquid when the system is not in use to prevent changes in liquid parameters due to water evaporation.
DGBE-based liquids should be used with care. As DGBE is a softener for most plastics, the liquid should be taken out of the phantom, and the phantom should be dried when the system is not in use (desirable at least once a week).

Do not use other organic solvents without previously testing the solvent resistivity of the phantom.
Approximately 25 liters of liquid is required to fill the SAM Twin phantom.

ELI Phantom



The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30MHz to 6 GHz. ELI is fully compatible with the latest draft of the standard IEEE 1528 and the use of all known tissue simulating liquids. ELI has been optimized for performance and can be integrated into a SPEAG standard phantom table. A cover is provided to prevent evaporation of water and changes in liquid parameters. 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 can be used with the following tissue simulating liquids:

- Sugar-water-based liquids can be left permanently in the phantom. Always cover the liquid when the system is not in use to prevent changes in liquid parameters due to water evaporation.

- DGBE-based liquids should be used with care. As DGBE is a softener for most plastics, the liquid should be taken out of the phantom, and the phantom should be dried when the system is not in use (desirable at least once a week).

- Do not use other organic solvents without previously testing the solvent resistivity of the phantom.

Approximately 25 liters of liquid is required to _fill the ELI phantom.

Robots

The DASY6 system uses the high-precision industrial robots TX60L, TX90XL, and RX160L from Staubli SA (France). The TX robot family - the successor of the well-known RX robot family - continues to offer the features important for DASY6 applications:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchrony motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)

The robots are controlled by the Staubli CS8c robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is provided

Calibration Frequency Points for ES3DV2 E-Field Probes SN: 3019 Calibrated: 2025/1/30

Calibration Frequency Point (MHz)	Frequency Range (MHz)		Conversion Factor		
	From	To	X	Y	Z
150 Head	100	200	7.12	7.02	7.02
450 Head	350	550	6.76	6.76	6.76

SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are 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. The minimum distance of probe sensors to surface is 1.4 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 15mm2 step integral, with 1.5mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	$\frac{1}{2}\cdot\delta\cdot\ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m^3 is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 5mm, with the side length of the 10g cube is 21.5mm.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB Publication 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 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 Drift Measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement 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. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of 7 x7 x 7 (5mm x 5mm x 5mm) providing a volume of 30 mm in the X & Y & Z axis.

Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE 1528:2013

Recommended Tissue Dielectric Parameters for Head liquid

Table A.3 – Dielectric properties of the head tissue-equivalent liquid

Frequency MHz	Relative permittivity ε_r	Conductivity (σ) S/m
300	45,3	0,87
450	43,5	0,87
750	*41,9*	*0,89*
835	41,5	0,90
900	41,5	0,97
1 450	40,5	1,20
1 500	*40,4*	*1,23*
1 640	*40,2*	*1,31*
1 750	*40,1*	*1,37*
1 800	40,0	1,40
1 900	40,0	1,40
2 000	40,0	1,40
2 100	*39,8*	*1,49*
2 300	*39,5*	*1,67*
2 450	39,2	1,80
2 600	*39,0*	*1,96*
3 000	38,5	2,40
3 500	*37,9*	*2,91*
4 000	*37,4*	*3,43*
4 500	*36,8*	*3,94*
5 000	*36,2*	*4,45*
5 200	*36,0*	*4,66*
5 400	*35,8*	*4,86*
5 600	*35,5*	*5,07*
5 800	*35,3*	*5,27*
6 000	*35,1*	*5,48*

NOTE For convenience, permittivity and conductivity values at those frequencies which are not part of the original data provided by Drossos et al. [33] or the extension to 5 800 MHz are provided (i.e. the values shown *in italics*). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6 000 MHz that were linearly extrapolated from the values at 3 000 MHz and 5 800 MHz.

EQUIPMENT LIST AND CALIBRATION

Equipment's List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
DASY5 Test Software	DASY52 52.10.4	N/A	NCR	NCR
DASY6 Measurement Server	DASY6 6.0.31	N/A	NCR	NCR
Data Acquisition Electronics	DAE4	1325	2024/10/08	2025/10/07
E-Field Probe	ES3DV2	3019	2025/1/30	2026/1/29
Mounting Device	MD4HHTV5	SD 000 H01 KA	NCR	NCR
Oval Flat Phantom	ELI V8.0 P1aP2a	2092	NCR	NCR
Loop, 150 MHz	CLA150	4020	2022/11/16	2025/11/15
Simulated Tissue 150 MHz Head	TS-150H	2503015001	Each Time	/
Network Analyzer	E5071C	SER MY46519680	2025/04/29	2026/04/28
Dielectric Assessment Kit	DAK-12	1162	NCR	NCR
MXG Analog Signal Generator	N5181A	MY48180408	2024/12/04	2025/12/03
USB wideband power sensor	U2021XA	MY52350001	2025/04/29	2026/04/28
Directional Coupler	DC6180A	325849	NCR	NCR
20dB Attenuator	2	BH9879	NCR	NCR
RF Power Amplifier	200W1000/M2	H1004497	NCR	NCR
Thermometer	DTM3000	N/A	2024/12/10	2025/12/09
Temperature & Humidity Meter	10316377	N/A	2024/12/10	2025/12/09
Spectrum Analyzer	FSV40	101942	2024/09/20	2025/09/19
Straight Steel Ruler	600mm	N/A	2024/12/11	2027/12/10

Note:

NCR: No Calibration Required.

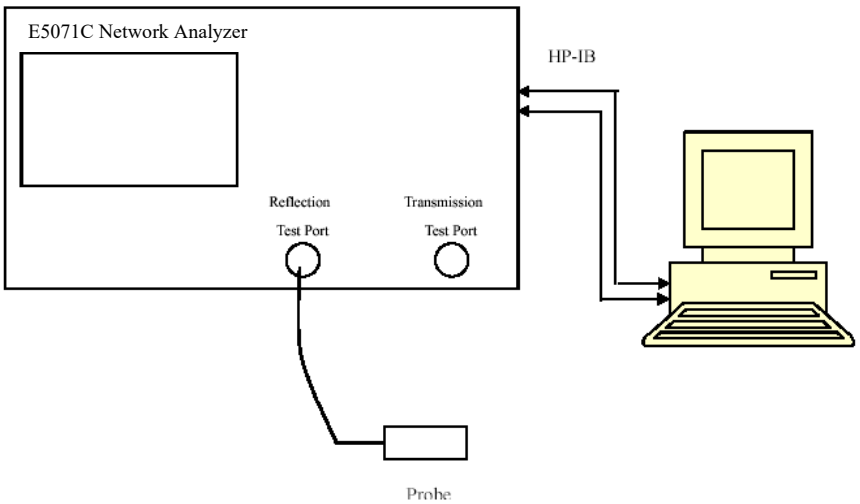
The Dipole calibration methods and procedures used were as detailed in:

FCC KDB Publication Number: "KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz"

1. The return-loss does not deviate more than 20% from the previous measurement and meets the required 20dB minimum return-loss requirement.
2. The measurement of real or imaginary parts of impedance does not deviate more than 5Ω from the previous measurement.
3. The verify result is on APPENDIX D.

SAR MEASUREMENT SYSTEM VERIFICATION

Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ε_r	σ (S/m)	ε_r	σ (S/m)	$\Delta\varepsilon_r$	Δσ (S/m)	
150	Simulated Tissue 150 MHz Head	50.249	0.729	52.3	0.76	-3.92	-4.08	±5
156.050	Simulated Tissue 150 MHz Head	50.102	0.733	52.02	0.76	-3.69	-3.55	±5
156.575	Simulated Tissue 150 MHz Head	50.094	0.747	51.99	0.76	-3.65	-1.71	±5
156.800	Simulated Tissue 150 MHz Head	49.981	0.754	51.98	0.76	-3.85	-0.79	±5
157.425	Simulated Tissue 150 MHz Head	49.905	0.767	51.95	0.77	-3.94	-0.39	±5

**Liquid Verification above was performed on 2025/08/15.*

System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of ±10%. The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

The spacing distances in the **System Verification Setup Block Diagram** is given by the following:

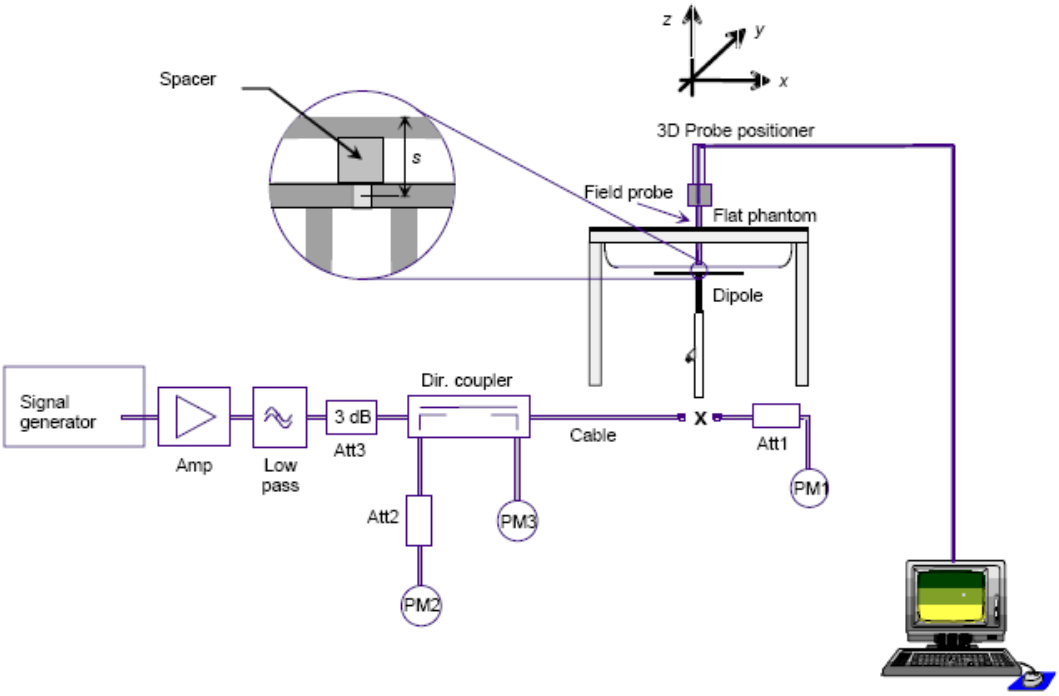
a) s = 15 mm ± 0,2 mm for 300 MHz ≤ f ≤ 1 000 MHz;

b) s = 10 mm ± 0,2 mm for 1 000 MHz < f ≤ 3 000 MHz;

c) s = 10 mm ± 0,2 mm for 3 000 MHz < f ≤ 6 000 MHz.

d) s = 0 mm for f = 150 MHz(Loop Antenna).

System Verification Setup Block Diagram



System Accuracy Check Results

Date	Frequency Band (MHz)	Liquid Type	Input Power (mW)	Measured SAR (W/kg)		Target Value (W/Kg)	Delta (%)	Tolerance (%)
2025/08/15	150	Head	1000	1g	3.52	3.72	-5.38	±10

SAR SYSTEM VALIDATION DATA

System Performance 150 MHz Head

DUT: Loop 150 MHz; Type: CLA150; Serial: 4020

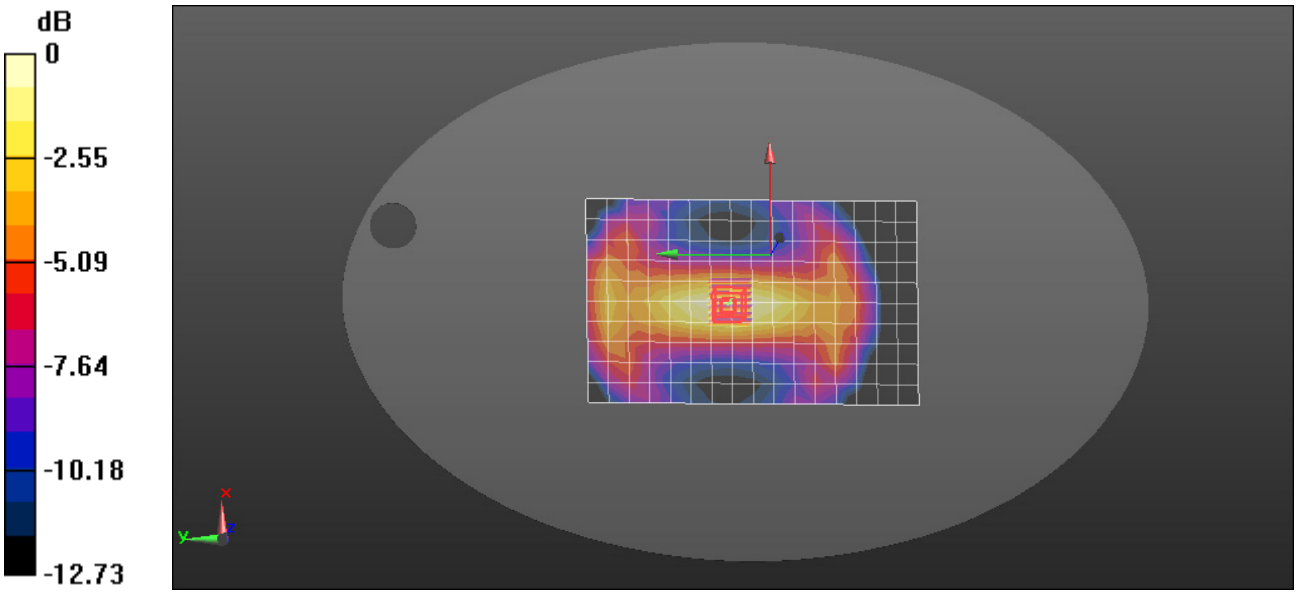
Communication System: UID 0, CW (0); Frequency: 150 MHz;Duty Cycle: 1:1
Medium parameters used: f = 150 MHz; σ = 0.729 S/m; ε_r = 50.249; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV2 - SN3019; ConvF(7.12, 7.02, 7.02) @ 150 MHz; Calibrated: 2025/1/30
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1325; Calibrated: 2024/10/8
- Phantom: ELI V8.0 P1aP2a; Type: QD OVA 004 AA; Serial: 2092
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Configuration/Head 150MHz Pin=1000mW/Area Scan (11x17x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 4.44 W/kg

Configuration/Head 150MHz Pin=1000mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 68.57 V/m; Power Drift = -0.12 dB
Peak SAR (extrapolated) = 5.59 W/kg
SAR(1 g) = 3.52 W/kg; SAR(10 g) = 2.41 W/kg
Smallest distance from peaks to all points 3 dB below: Larger than measurement grid (> 15 mm)
Ratio of SAR at M2 to SAR at M1 = 65.1%
Maximum value of SAR (measured) = 4.23 W/kg

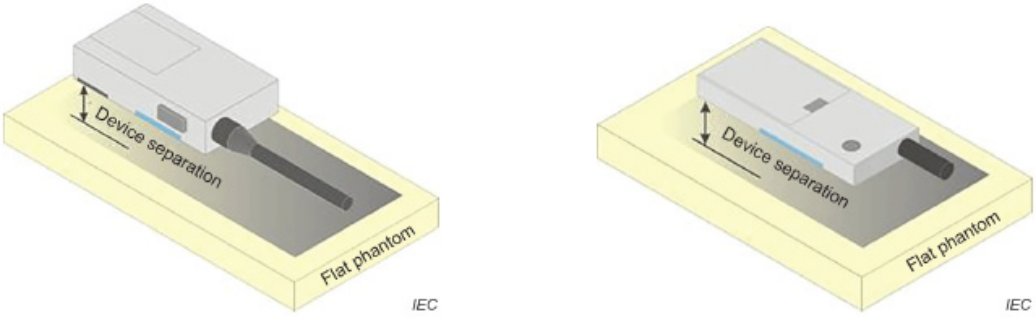


0 dB = 4.23 W/kg = 6.26 dBW/kg

EUT TEST STRATEGY AND METHODOLOGY

Test positions for Front-of-face configurations

Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios. Head SAR is measured with the front surface of the radio positioned at 2.5 cm parallel to a flat phantom. A phantom shell thickness of 2 mm is required. When the front of the radio has a contour or non-uniform surface with a variation of 1.0 cm or more, the average distance of such variations is used to establish the 2.5 cm test separation from the phantom.



b) Two-way radios

Figure 10 – Test positions for front-of-face devices

Test positions for body-worn and other configurations

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations. Devices with a headset output should be tested with a headset connected to the device. When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., the same metallic belt-clip used with different holsters with no other metallic components), only the accessory that dictates the closest spacing to the body must be tested.

Body-worn accessories may not always be supplied or available as options for some devices that are intended to be authorized for body-worn use. A separation distance of 1.5 cm between the back of the device and a flat phantom is recommended for testing body-worn SAR compliance under such circumstances. Other separation distances may be used, but they should not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

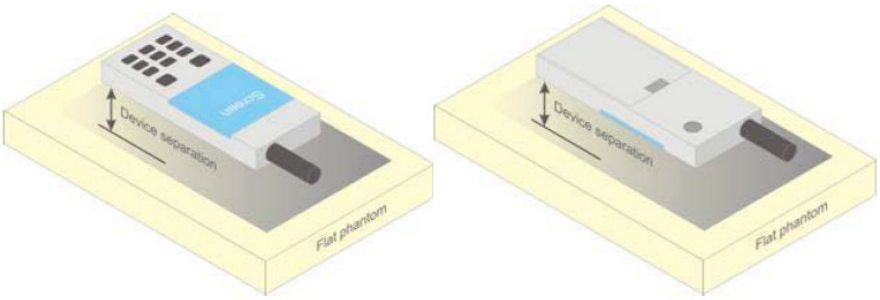


Figure 5 – Test positions for body-worn devices

Test Distance for SAR Evaluation

In this case the EUT(Equipment Under Test) is set directly against the phantom, the test distance is 0mm for Body Back mode; for Face Up mode the distance is 25mm.

SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or radiating structures of the EUT, the horizontal grid spacing was 15 mm x 15 mm, and the SAR distribution was determined by integrated grid of 1.5mm x 1.5mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 30 mm x 30 mm x 30 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. 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.

2) The maximum Measured value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the “Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were Measured to calculate the averages.

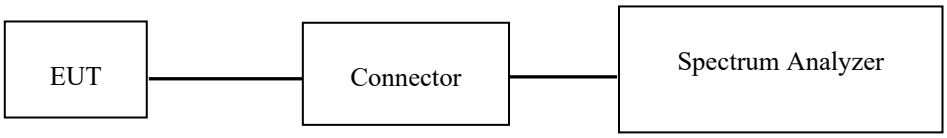
All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

CONDUCTED OUTPUT POWER MEASUREMENT

Test Procedure

The RF output of the transmitter was connected to the input port of the Spectrum Analyzer through Connector.



PTT

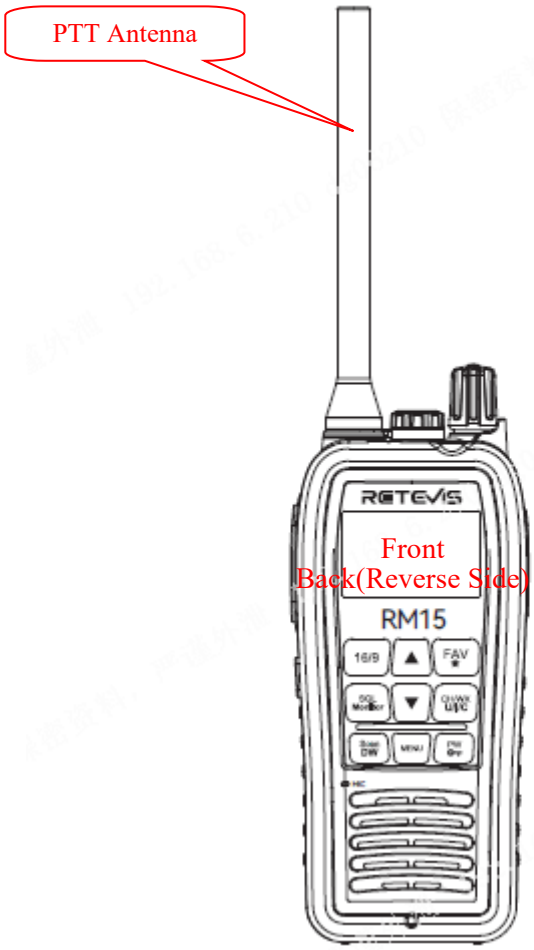
Maximum Target Output Power

Mode		Max. tune-up tolerance power limit for Production(dBm)
PTT(156.05-157.425 MHz)	**FM 25kHz**	38.5

Test Results

Test Mode		Frequency (MHz)	Measured Output Power Unit (dBm)
PTT (156.05-157.425 MHz)	**FM 25kHz**	156.050	38.04
		156.575	37.97
		156.800	38.05
		157.425	**38.08**

Antennas Location:



SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetry evaluation.

Test Results:

Environmental Conditions:

Ambient Temperature:	18.9 ~ 20.3℃
Relative Humidity:	46 ~ 60%
ATM Pressure:	100.1 kPa
Test Date:	*2025/08/15*

** Testing was performed by Calvin Li.*

PTT(156.05-157.425 MHz):

Pre-Scan all 4 Channels, the peak SAR located on 156.050 MHz for Face Up mode and Body Back mode.

Test Position	Channel Separation	Frequency (MHz)	Worn Accessories	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR Value(W/kg)				
						Power Scaled Factor	Meas. SAR	PTT 50% Factor	Scaled SAR	Plot
Head Face Up (25 mm)	FM 25kHz	156.050	None	38.04	38.5	1.112	1.63	0.815	**0.91**	**1#**
		156.575	None	/	/	/	/	/	/	/
		156.800	None	/	/	/	/	/	/	/
		157.425	None	/	/	/	/	/	/	/
Body Back (0 mm)	FM 25kHz	156.050	Belt Clip+Headset	38.04	38.5	1.112	1.42	0.71	**0.79**	**2#**
		156.575	Belt Clip+Headset	37.97	38.5	1.13	1.37	0.685	0.77	/
		156.800	Belt Clip+Headset	38.05	38.5	1.109	1.40	0.7	0.78	/
		157.425	Belt Clip+Headset	38.08	38.5	1.102	1.35	0.675	0.74	/

Note:

1. When the 1-g SAR is ≤ 3.5W/kg, testing for other channels are optional.
2. For a PTT, only simplex communication technology was supported, so the SAR value need to be corrected by Multiplying 50%.
3. Passive body-worn and audio accessories generally do not apply to the head SAR of PTT radios.
5. The whole antenna and radiating structures that may contribute to the measured SAR or influence the SAR distribution has been included in the area scan.
5.The VHF bands in this device operate in a half duplex system. A half duplex system only allows the user to transmit or receive. This device cannot transmit and receive simultaneously. The user must stop transmitting in order to receive a signal or listen for a response, regardless of PTT button or with a VOX(Voice Activated Transmit) capacity. This type of operation, along with the RF safety booklet, which instructs the user to transmit no more than 50% of the time, justifies the use of 50% duty factor for this device.

SAR Measurement Variability

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz v01. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results:

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

Note: 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.

The Highest Measured SAR Configuration in Each Frequency Band

Head

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		Largest to Smallest SAR Ratio
				Original	Repeated	
/	/	/	/	/	/	/

Body

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)			Largest to Smallest SAR Ratio
				Original	First Repeated	Second Repeated	
/	/	/	/	/	/	/	/

Note:

1. Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not > 1.20.
2. The measured SAR results **do not** have to be scaled to the maximum tune-up tolerance to determine if repeated measurements are required.
3. 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.

SAR DUT HOLDER PERTURBATIONS

In accordance with TCB workshop October 2016:

1) SAR perturbation due to test device holders, depending on antenna locations, buttons locations on phones or device, form factor (e.g. dongles etc.), the measured SAR could be influenced by the relative positions of the test device and its holder

2) SAR measurement standards have included protocols to evaluate this with a flat phantom, with and without the device holder

3) When the highest reported SAR of an antenna is > 1.2 W/kg, holder perturbation verification is required for each antenna, using the highest SAR configuration among all applicable frequency bands in the same exact device and holder positions used for head and body SAR measurements; i.e. same device/button locations in the holder

Per IEEE 1528: 2013/Annex E/E.4.1.1: Device holder perturbation tolerance for a specific test device: Type B When it is unknown if a device holder perturbs the fields of a test device, the SAR uncertainty shall be assessed with a flat phantom (see Clause 5) by comparing the SAR with and without the device holder according to the following tests:

The SAR tolerance for device holder disturbance is computed using Equation (E.21) and entered in the corresponding row of the appropriate uncertainty table with an assumed rectangular probability distribution and $vi = \infty$ degrees of freedom:

$$SAR_{\text{tolerance}}[\%] = 100 \times \left(\frac{SAR_{\text{w/ holder}} - SAR_{\text{w/o holder}}}{SAR_{\text{w/o holder}}} \right) \quad \text{(E.21)}$$

The Highest Measured SAR Configuration among all applicable Frequency Band

Head

Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		The Device holder perturbation uncertainty
			With holder	Without holder	
/	/	/	/	/	/

Body

Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		The Device holder perturbation uncertainty
			With holder	Without holder	
/	/	/	/	/	/

SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

The device does not have simultaneous transmission capability.

SAR Plots

Test Plot 1#:

DUT: Two Way Radio; Type: RM15; Serial: 33J6-1

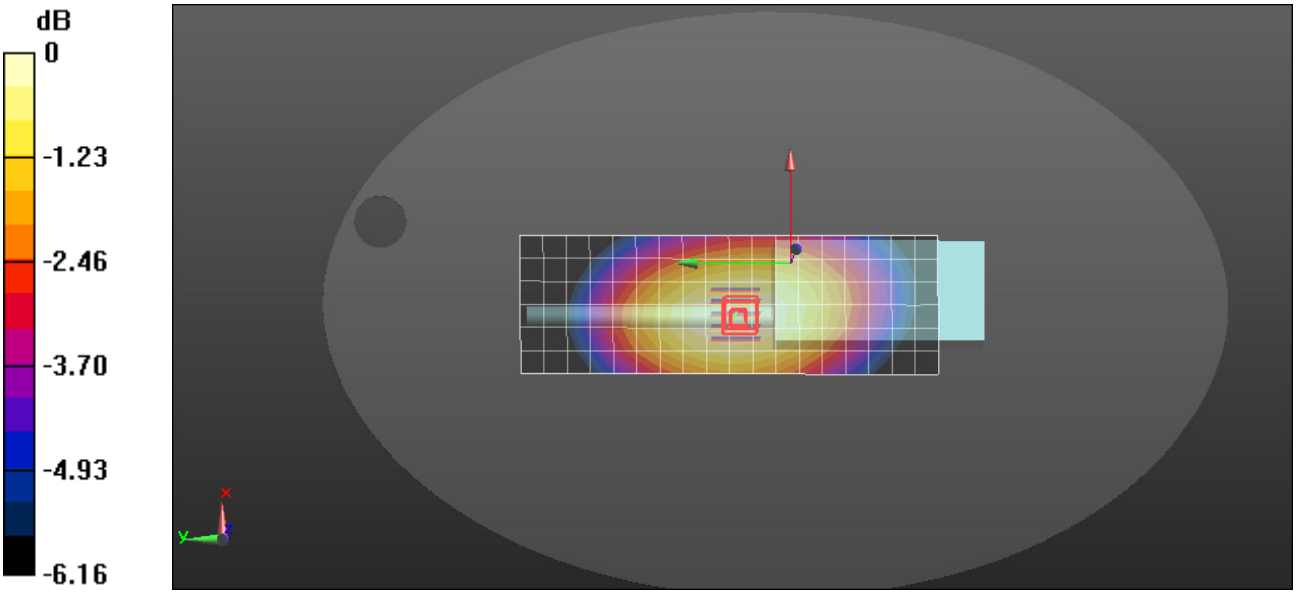
Communication System: UID 0, FM (0); Frequency: 156.05 MHz;Duty Cycle: 1:1
Medium parameters used: f = 156.05 MHz; σ = 0.733 S/m; ε_r = 50.102; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV2 - SN3019; ConvF(7.12, 7.02, 7.02) @ 156.05 MHz; Calibrated: 2025/1/30
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1325; Calibrated: 2024/10/8
- Phantom: ELI V8.0 P1aP2a; Type: QD OVA 004 AA; Serial: 2092
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Face Up/156.05MHz/Area Scan (7x19x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 1.83 W/kg

Face Up/156.05MHz/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 48.93 V/m; Power Drift = -0.11 dB
Peak SAR (extrapolated) = 2.21 W/kg
SAR(1 g) = 1.63 W/kg; SAR(10 g) = 1.27 W/kg
Smallest distance from peaks to all points 3 dB below: Larger than measurement grid (> 16 mm)
Ratio of SAR at M2 to SAR at M1 = 75.8%
Maximum value of SAR (measured) = 1.79 W/kg



0 dB = 1.79 W/kg = 2.53 dBW/kg

Test Plot 2#:

DUT: Two Way Radio; Type: RM15; Serial: 33J6-1

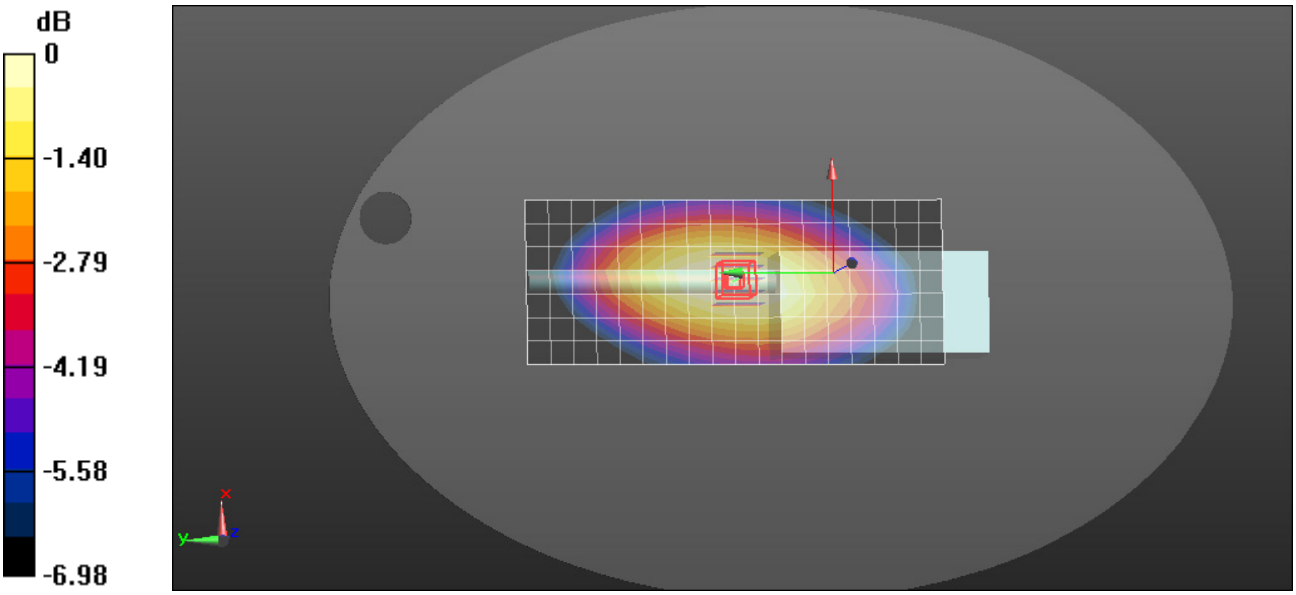
Communication System: UID 0, FM (0); Frequency: 156.05 MHz;Duty Cycle: 1:1
Medium parameters used: f = 156.05 MHz; σ = 0.733 S/m; ε_r = 50.102; ρ = 1000 kg/m^3
Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV2 - SN3019; ConvF(7.12, 7.02, 7.02) @ 156.05 MHz; Calibrated: 2025/1/30
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1325; Calibrated: 2024/10/8
- Phantom: ELI V8.0 P1aP2a; Type: QD OVA 004 AA; Serial: 2092
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Body Back/156.05MHz/Area Scan (8x19x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 1.62 W/kg

Body Back/156.05MHz/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 42.76 V/m; Power Drift = -0.12 dB
Peak SAR (extrapolated) = 2.00 W/kg
SAR(1 g) = 1.42 W/kg; SAR(10 g) = 1.07 W/kg
Smallest distance from peaks to all points 3 dB below: Larger than measurement grid (> 16 mm)
Ratio of SAR at M2 to SAR at M1 = 73.1%
Maximum value of SAR (measured) = 1.59 W/kg



0 dB = 1.59 W/kg = 2.01 dBW/kg

APPENDIX A MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

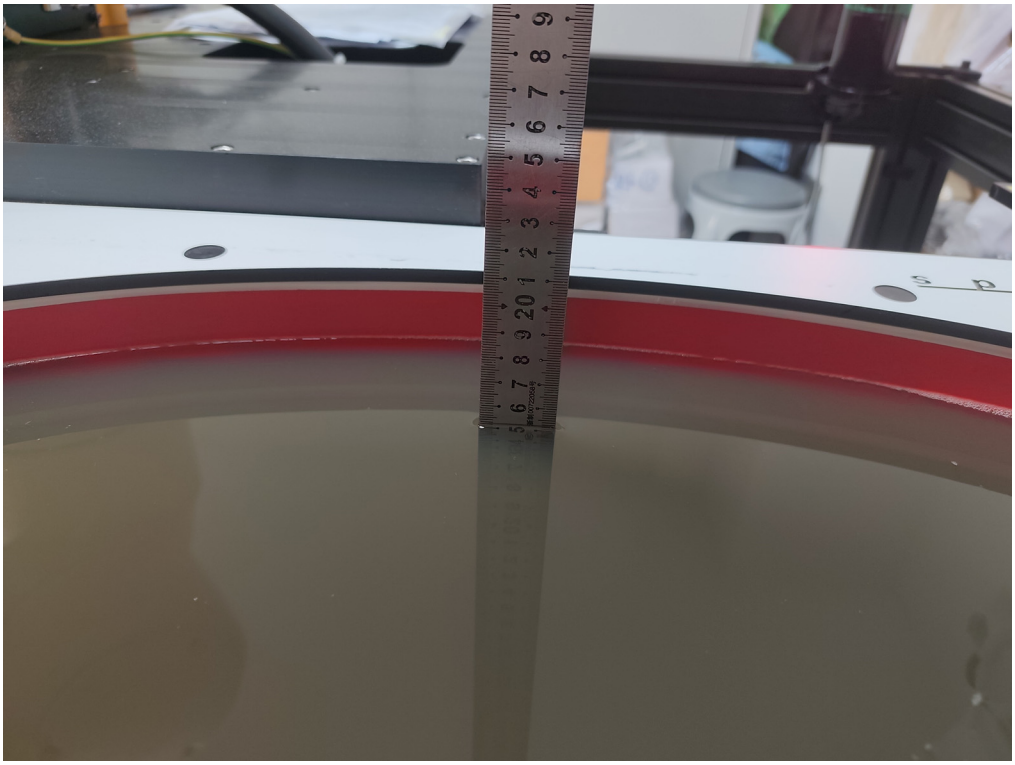
Measurement uncertainty evaluation for IEEE1528-2013 SAR test

Source of uncertainty	Tolerance/ Uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard Uncertainty ± %, (1 g)	Standard Uncertainty ± %, (10 g)
Measurement system							
Probe calibration	13.9	N	1	1	1	13.9	13.9
Axial Isotropy	4.7	R	√3	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	√3	0	0	0.0	0.0
Boundary effect	1.0	R	√3	1	1	0.6	0.6
Linearity	4.7	R	√3	1	1	2.7	2.7
Detection limits	1.0	R	√3	1	1	0.6	0.6
Modulation response	4.0	R	√3	1	1	2.3	2.3
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	√3	1	1	0.0	0.0
Integration time	0.0	R	√3	1	1	0.0	0.0
RF ambientconditions – noise	1.0	R	√3	1	1	0.6	0.6
RF ambient conditions–reflections	1.0	R	√3	1	1	0.6	0.6
Probe positioner mech. Restrictions	0.8	R	√3	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	√3	1	1	3.9	3.9
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	3.9	R	√3	1	1	2.3	2.3
Test sample related							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	5.1	N	1	1	1	5.1	5.1
Drift of output power	5.0	R	√3	1	1	2.9	2.9
SAR scaling	2.0	R	√3	1	1	1.2	1.2
Phantom and tissue parameters							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	√3	1	1	2.3	2.3
Uncertainty in SAR correction for deviations in permittivity and conductivity	1.9	N	1	1	0.84	1.9	1.6
Liquid conductivity measurement	5.5	N	1	0.78	0.71	4.3	3.9
Liquid permittivity measurement	2.9	N	1	0.23	0.26	0.7	0.8
Liquid conductivity—temperature uncertainty	1.7	R	√3	0.78	0.71	0.8	0.7
Liquid permittivity—temperature uncertainty	2.7	R	√3	0.23	0.26	0.4	0.4
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.3	23.9

APPENDIX B EUT TEST POSITION PHOTOS

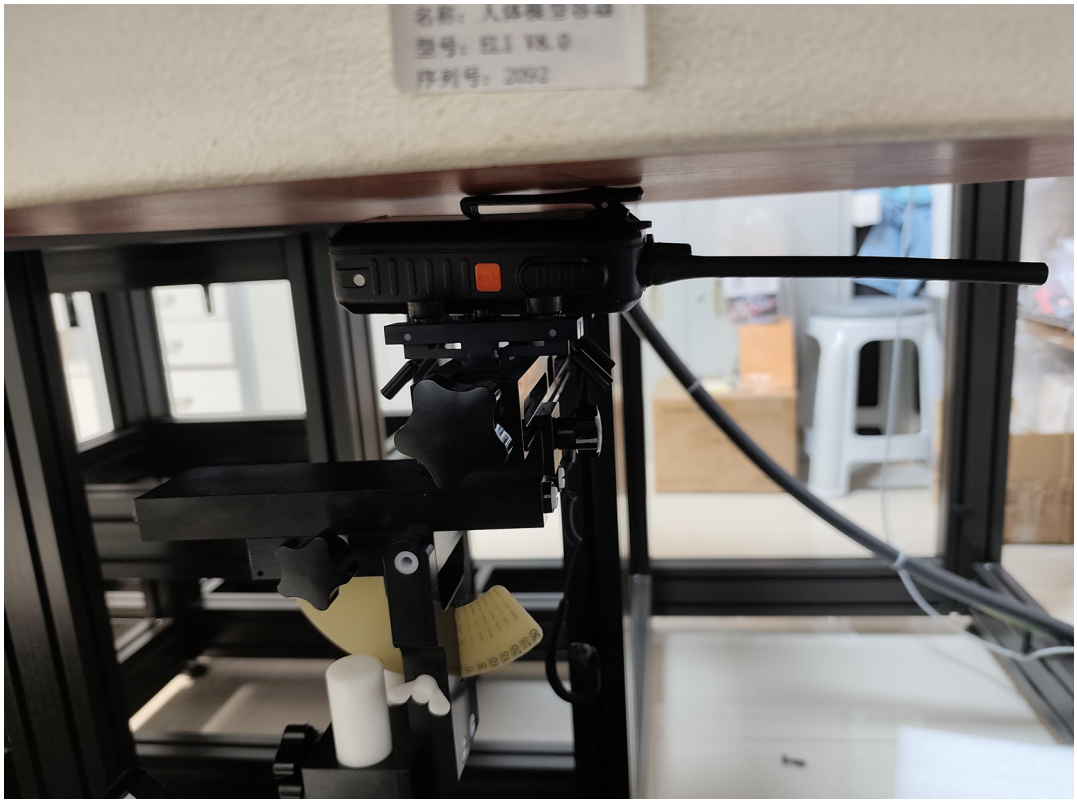
Liquid depth ≥ 15cm

Phantom: ELI V8.0 P1aP2a; Type: QD OVA 004 AA; Serial: 2092



Face Up Setup Photo (25 mm)

Body Back With Belt Clip Setup Photo (0 mm)



APPENDIX C CALIBRATION CERTIFICATES

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
Servizio svizzero di taratura
S Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Client **BACL** Sunnyvale, USA

Certificate No. **ES-3019_Jan25**

CALIBRATION CERTIFICATE

Object	ES3DV2 - SN:3019
Calibration procedure(s)	QA CAL-01.v10, QA CAL-12.v10, QA CAL-23.v6, QA CAL-25.v8 Calibration procedure for dosimetric E-field probes
Calibration date	January 30, 2025

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP2	SN: 104778	26-Mar-24 (No. 217-04036/04037)	Mar-25
Power sensor NRP-Z91	SN: 103244	26-Mar-24 (No. 217-04036)	Mar-25
OCP DAK-3.5 (weighted)	SN: 1249	23-Sep-24 (OCP-DAK3.5-1249_Sep24)	Sep-25
OCP DAK-12	SN: 1016	24-Sep-24 (OCP-DAK12-1016_Sep24)	Sep-25
Reference 20 dB Attenuator	SN: CC2552 (20x)	26-Mar-24 (No. 217-04046)	Mar-25
DAE4	SN: 660	23-Feb-24 (No. DAE4-660_Feb24)	Feb-25
Reference Probe EX3DV4	SN: 7349	03-Jun-24 (No. EX3-7349_Jun24)	Jun-25

Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-24)	In house check: Jun-26
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-24)	In house check: Jun-26
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-24)	In house check: Jun-26
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-24)	In house check: Jun-26
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Sep-24)	In house check: Sep-26

	Name	Function	Signature
Calibrated by	Joanna Lleshaj	Laboratory Technician	
Approved by	Sven Kühn	Technical Manager	

Issued: January 31, 2025

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

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
Servizio svizzero di taratura
S Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Glossary

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

Calibration is Performed According to the Following Standards:

a) IEC/IEEE 62209-1528, "Measurement Procedure For The Assessment Of Specific Absorption Rate Of Human Exposure To Radio Frequency Fields From Hand-Held And Body-Worn Wireless Communication Devices – Part 1528: Human Models, Instrumentation And Procedures (Frequency Range of 4 MHz to 10 GHz)", October 2020.
b) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- *NORMx,y,z*: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not affect the E^2-field uncertainty inside TSL (see below *ConvF*).
- *NORM(f)x,y,z = NORMx,y,z * frequency_response* (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- *DCPx,y,z*: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal. DCP does not depend on frequency nor media.
- *PAR*: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- *Ax,y,z; Bx,y,z; Cx,y,z; Dx,y,z; VRx,y,z: A, B, C, D* are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- *ConvF and Boundary Effect Parameters*: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to *NORMx,y,z * ConvF* whereby the uncertainty corresponds to that given for *ConvF*. A frequency dependent *ConvF* is used in DASY version 4.4 and higher which allows extending the validity from ±50 MHz to ±100 MHz.
- *Spherical isotropy (3D deviation from isotropy)*: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- *Sensor Offset*: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- *Connector Angle*: The angle is assessed using the information gained by determining the *NORMx* (no uncertainty required).