

FCC SAR EVALUATION REPORT

**In accordance with the requirements of
FCC 47 CFR Part 2(2.1093) and
IEEE Std 1528-2013**

Product Name: TWO WAY RADIO

Model No.: RT21H

Serial Model: RT21

Brand Name: RETEVIS

Report No.: AITSZ-251022053FW1

FCC ID: 2ASNSRT21H

Prepared for

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TEST RESULT CERTIFICATION

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Manufacturer's Name : Shenzhen Retevis Technology Co., Ltd.
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Product description

Product name : TWO WAY RADIO

Trademark : RETEVIS

Model and/or type reference : RT21H

Serial Model..... : RT21

FCC 47 CFR Part 2(2.1093)

Standards : IEEE Std 1528-2013

Published RF exposure KDB procedures

This device described above has been tested by Guangdong Asia Hongke Test Technology Limited. In accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 and KDB 865664 D01. Testing has shown that this device is capable of compliance with localized specific absorption rate (SAR) specified in FCC 47 CFR Part 2(2.1093). 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.

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Test Sample Number..... : AITSZ-251022053-1

Date of Test

Date (s) of performance of tests..... : Oct. 30, 2025

Date of Issue..... : Nov. 14, 2025

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

Reviewed by: Ken Zou
Ken Zou

Approved by: Jack Li
Jack Li

※ ※ Revision History ※ ※

REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	Nov. 14, 2025	Jack Li

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1. General Information

1.1. RF exposure limits

(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.

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).

General Population/Uncontrolled Environments:

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

NOTE
TRUNK LIMIT
1.6 W/kg
APPLIED TO THIS EUT

1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing as follows.

Band	Max SAR Value Reported(W/kg)	
	1-g Front of face (Separation distance of 25mm)	1-g Body worn (Separation distance of 0mm)
Walkie Talkie	0.130	0.831

NOTE: This device is compliance with Specific Absorption Rate (SAR) for General Population/Uncontrolled Exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2(2.1093), and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 & KDB 865664 D01.

1.3. EUT Description

Device Information	
Product Name	TWO WAY RADIO
Model Name	RT21H
Family Model	RT21
Model Difference	PCB board, structure and internal of these model(s) are the same, So no additional models were tested
Device Phase	Identical Prototype
Exposure Category	General Population/Uncontrolled
Antenna Type	External antenna
Ratings	DC 3.7V by Rechargeable Li-ion Battery, 1200mAh
Hardware version	01V01C
Software version	V1.0
Device Operating Configurations	
Frequency Range	462.5500MHz~462.7250MHz (2.0W)
Channel Number	15 Channels
Test Channel	Channel 1, 2, 4, 12
Modulation Type	FM
Channel Separation	12.5KHz
Emission Type	F3E

1.4. Test specification(s)

FCC 47 CFR Part 2(2.1093)
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02 RF Exposure Reporting v01r02
KDB 447498 D01 General RF Exposure Guidance v06
KDB648474 D04 Handset SAR v01r03

1.5. Ambient Condition

Ambient temperature	20°C – 24°C
Relative Humidity	30% – 70%

1.6. Test Facility

Test Laboratory:

Guangdong Asia Hongke Test Technology Limited

B1/F, Building 11, Junfeng Industrial Park, Chongqing Road, Heping Community, Fuhai Street, Bao'an District, Shenzhen, Guangdong, China

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

FCC-Registration No.: 251906 Designation Number: CN1376

Guangdong Asia Hongke Test Technology Limited has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files.

IC —Registration No.: 31737 CAB identifier: CN0165

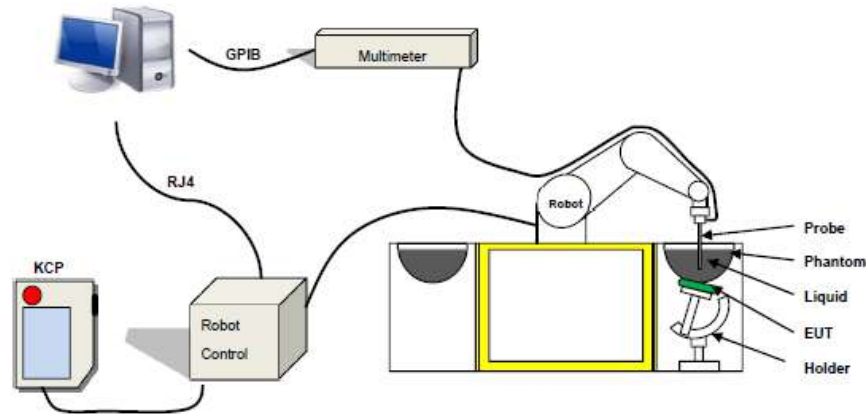
The 3m Semi-anechoic chamber of Guangdong Asia Hongke Test Technology Limited has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 31737

A2LA-Lab Cert. No.: 7133.01

Guangdong Asia Hongke Test Technology Limited has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2017 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

2. SAR Measurement System

2.1. SATIMO SAR Measurement Set-up Diagram



These measurements were performed with the automated near-field scanning system OPENSAR from SATIMO. The system is based on a high precision robot (working range: 901 mm), which positions the probes with a positional repeatability of better than ± 0.03 mm. The SAR measurements were conducted with dosimetric probe (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

The first step of the field measurement is the evaluation of the voltages induced on the probe by the device under test. Probe diode detectors are nonlinear. Below the diode compression point, the output voltage is proportional to the square of the applied E-field; above the diode compression point, it is linear to the applied E-field. The compression point depends on the diode, and a calibration procedure is necessary for each sensor of the probe.

The Keithley multimeter reads the voltage of each sensor and send these three values to the PC. The corresponding E field value is calculated using the probe calibration factors, which are stored in the working directory. This evaluation includes linearization of the diode characteristics. The field calculation is done separately for each sensor. Each component of the E field is displayed on the "Dipole Area Scan Interface" and the total E field is displayed on the "3D Interface"

2.2. Robot

The SATIMO SAR system uses the high precision robots from KUKA. For the 6-axis controller system, the robot controller version (KUKA) from KUKA is used. The KUKA robot series have many features that are important for our application:



- High precision (repeatability ± 0.03 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

2.3. Probe

This E-field detection probe is composed of three orthogonal dipoles linked to special Schottky diodes with low detection thresholds. The probe allows the measurement of electric fields in liquids such as the one defined in the IEEE and CENELEC standards.

For the measurements the Specific Dosimetric E-Field Probe SN 31/17 EPGO324 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°

2.3.1. E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy shall be evaluated and within $\pm 0.25\text{dB}$. The sensitivity parameters (Norm X, Norm Y, and Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe are tested. The calibration data can be referred to appendix D of this report.

2.4. Phantoms

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 dosimetrist 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.

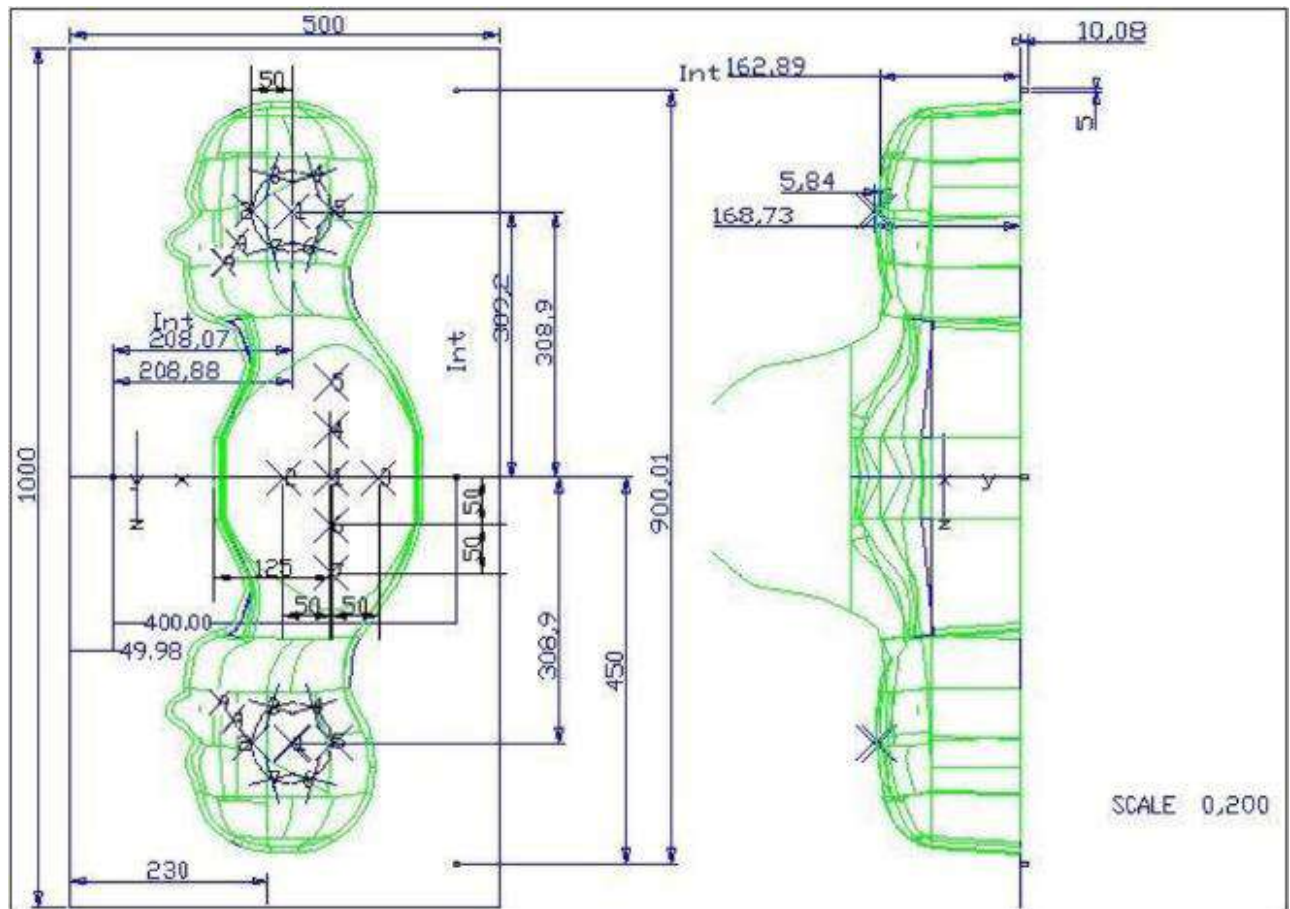


SAM



Elliptical

2.5. Technical Data

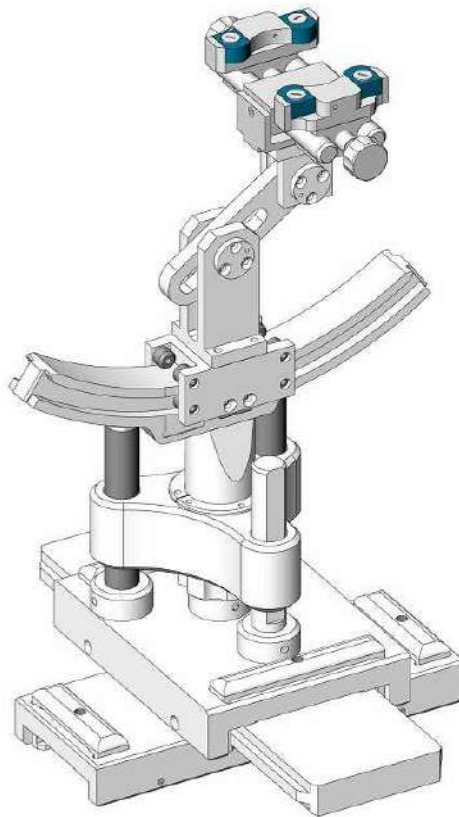


Left Head(mm)		Right Head(mm)		Flat Part(mm)	
2	2.02	2	2.08	1	2.09
3	2.05	3	2.06	2	2.06
4	2.07	4	2.07	3	2.08
5	2.08	5	2.08	4	2.10
6	2.05	6	2.07	5	2.10
7	2.05	7	2.05	6	2.07
8	2.07	8	2.06	7	2.07
9	2.08	9	2.06	-	-

Overall thickness	2±0.2mm
Internal Dimensions (Bottom part)	600 mm (L) x 400 mm (W) 170 mm (H)
External Dimensions	1000 mm (L) x 500 mm (W) x 280 mm (H)
Maximum volume	35 L
Material	Fiberglass based
Relative permittivity	3.4
Loss tangent	0.02

The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10 µm.

2.6. 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.



The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface.

Material properties: the positioning system is made of PETP. This material offers a low permittivity of 3.2 and low loss, with a loss tangent of 0.005 to minimize the influence of the DUT on measurement results.

Mechanical properties: 2 rows of rail to cover easily the surface of the phantom. The fixing plate is perfectly adapted to larger devices, such as a PC which can be positioned in all configurations.

Accuracy and precision: graduated scale available on each axis. The DUT is fixed with a specific adaptable grip.

2.7. Test Equipment List

This table gives a complete overview of the SAR measurement equipment.

Devices used during the test described are marked ☒

	Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
					Last Cal.	Due Date
☒	MVG	E FIELD PROBE	SSE2	SN 31/17 EPGO324	Sep. 08, 2025	Sep. 07, 2026
☒	MVG	450 MHz Dipole	SID450	SN 38/18 DIP 0G450-465	Feb. 21, 2025	Feb. 20, 2028
☐	MVG	750 MHz Dipole	SID750	SN 03/15 DIP 0G750-355	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	835 MHz Dipole	SID835	SN 03/15 DIP 0G835-347	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	900 MHz Dipole	SID900	SN 03/15 DI P 0G900-348	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	1800 MHz Dipole	SID1800	SN 03/15 DIP 1G800-349	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	1900 MHz Dipole	SID1900	SN 03/15 DIP 1G900-350	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2000 MHz Dipole	SID2000	SN 03/15 DIP 2G000-351	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2300 MHz Dipole	SID2300	SN 03/16 DIP 2G300-358	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2450 MHz Dipole	SID2450	SN 03/15 DIP 2G450-352	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2600 MHz Dipole	SID2600	SN 03/15 DIP 2G600-356	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	5000 MHz Dipole	SWG5500	SN 13/14 WGA 33	Feb. 21, 2024	Feb. 20, 2027
☒	MVG	Liquid measurement Kit	SCLMP	SN 21/15 OCPG 72	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
☒	KEITHLEY	Millivoltmeter	2000	4072790	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025

					Jun. 30, 2025	Jun. 29, 2026
☐	R&S	Wideband radio communication tester	CMW500	116581	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	HP	Network Analyzer	8753D	3410J01136	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	PSG Analog Signal Generator	E8257D	MY51110112	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102538	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102140	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power meter	E4419B	MY45102215	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-494-4	Jul. 02, 2023	Jul. 01, 2024

					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-492-1	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	JFW	attenuator	50FPE-006	4360846-490-6	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power sensor	E9301A	MY41495644	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	Agilent	Power sensor	E9301A	US39212148	Jul. 02, 2023	Jul. 01, 2024
					Jul. 01, 2024	Jun. 30, 2025
					Jun. 30, 2025	Jun. 29, 2026
☒	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Jul. 18, 2021	Jul. 17, 2024
					Jul. 17, 2024	Jul. 16, 2027
☒	N/A	Thermometer	N/A	LES-085	Sep. 23, 2024	Sep. 22, 2027
☒	MVG	Elliptical Phantom	SSM2	SN 20/11 ELLI20	NCR	NCR
☒	MVG	Device Holder	SMPPD	SN 24/11 LSH15	NCR	NCR

3. SAR Measurement Procedures

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

3.1. Power Reference

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. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

3.2. Area scan & Zoom scan

The area scan is a 2D scan to find the hot spot location on the DUT. The zoom scan is a 3D scan above the hot spot to calculate the 1g and 10g SAR value.

Measurement of the SAR distribution with a grid of 8 to 16 mm * 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.

From the scanned SAR distribution, identify the position of the maximum SAR value, in addition identify the positions of any local maxima with SAR values within 2 dB of the maximum value that will not be within the zoom scan of other peaks; additional peaks shall be measured only when the primary peak is within 2 dB of the SAR compliance limit (e.g., 1 W/kg for 1,6 W/kg 1 g limit, or 1,26 W/kg for 2 W/kg, 10 g limit).

Area scan & Zoom scan scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

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

3.3. Description of interpolation/extrapolation scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimise measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1 mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

3.4. Volumetric Scan

The volumetric scan consists to a full 3D scan over a specific area. This 3D scan is useful form multi Tx SAR measurement. Indeed, it is possible with OpenSAR to add, point by point, several volumetric scan to calculate the SAR value of the combined measurement as it is define in the standard IEEE1528 and IEC62209.

3.5. Power Drift

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In OpenSAR measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in V/m. If the power drifts more than $\pm 5\%$, the SAR will be retested.

4. System Verification Procedure

4.1. Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients (% of weight)	Head Tissue										
	450	750	835	900	1800	1900	2000	2450	2600	5200	5800
Frequency Band (MHz)											
Water	34.40	34.40	34.40	34.40	55.36	55.36	57.87	57.87	57.87	65.53	65.53
NaCl	0.79	0.79	0.79	0.79	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	64.81	64.81	64.81	64.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	0.00	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid depth from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm.



4.1.1. Tissue Dielectric Parameter Check Results

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine if the dielectric parameters are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within $\pm 5\%$ of the target values.

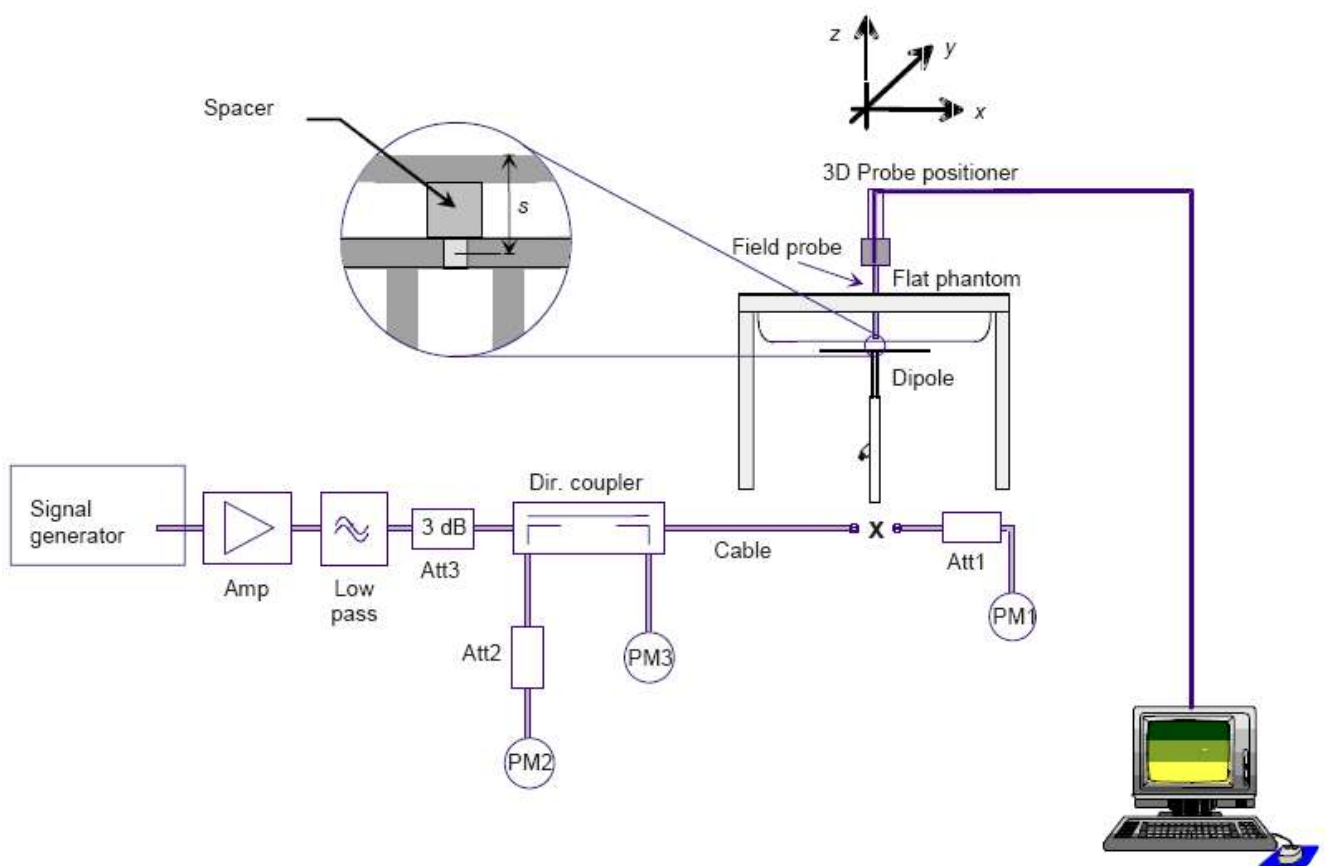
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue		Liquid Temp.	Test Date
		$\epsilon_r (\pm 5\%)$	$\sigma \text{ (S/m)} (\pm 5\%)$	ϵ_r	$\sigma \text{ (S/m)}$		
Head 450	450	43.50 (41.33~45.68)	0.87 (0.83~0.91)	43.50	0.87	22.1 °C	Oct. 30, 2025

NOTE: The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.

4.2. System Verification Procedure

The system verification is performed for verifying the accuracy of the complete measurement system and performance of the software. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 100mW (below 5GHz) or 100mW (above 5GHz). To adjust this power a power meter is used. The power sensor is connected to the cable before the system verification to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system verification to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test (result on plot).

The system verification is shown as below picture:



4.2.1. System Verification Results

Comparing to the original SAR value provided by SATIMO, the verification data should be within its specification of $\pm 10\%$. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance verification can meet the variation criterion and the plots can be referred to Appendix B of this report.

System Verification	Power fed to reference dipole (mW)	Measured SAR Value		Measured SAR (Normalized to 1W)		Target SAR Value (1W)		Deviation (%)		Test Date
		1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	
450MHz	100	0.443	0.279	4.43	2.79	4.70	3.01	-5.74%	-7.31%	Oct. 30, 2025

5. SAR measurement variability

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

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

2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.

3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 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 .

6. SAR Measurement Uncertainty

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=2$.

Symbol	Uncertainty Component	Prob. Dist.	Unc. $a(x_i)$	Div. q_i	$u(x_i) = a(x_i)/q_i$	C_i	$u(y) = C_i * u(x_i)$	v_i
Measurement system errors								
CF	Probe calibration	N ($k = 2$)	5.72	2	2.86	1	2.86	∞
CF _{drift}	Probe calibration drift	R	0.15	$\sqrt{3}$	0.09	1	0.09	∞
LIN	Probe linearity and detection limit	R	1.27	$\sqrt{3}$	0.73	1	0.73	∞
BBS	Broadband signal	R	0.12	$\sqrt{3}$	0.07	1	0.07	∞
ISO	Probe isotropy	R	0.16	$\sqrt{3}$	0.09	1	0.09	∞
DAE	Other probe and data acquisition errors	N	2.4	1	2.40	1	2.40	∞
AMB	RF ambient and noise	N	3.51	1	3.51	1	3.51	∞
Δ_{xyz}	Probe positioning errors	N	1.2	1	1.20	$2/\delta$	1.20	
DAT	Data processing errors	N	2.1	1	2.10	1	2.10	∞
Phantom and device (DUT or validation antenna) errors								
LIQ(σ)	Measurement of phantom conductivity(σ)	N	4.1	1	4.1	C_ϵ, C_σ	4.10	∞
LIQ(T_c)	Temperature effects (medium)	R	2.7	$\sqrt{3}$	1.56	C_ϵ, C_σ	1.56	∞
EPS	Shell permittivity	R	2.1	$\sqrt{3}$	1.21	See 8.4.2.3	0.30	∞
DIS	Distance between the radiating element of the DUT and the phantom medium	N	0.7	1	0.7	2	1.40	∞
D _{xyz}	Repeatability of positioning the DUT or source against the phantom	N	1.2	1	1.2	1	1.20	5
H	Device holder effects	N	3.8	1	3.8	1	3.80	
MOD	Effect of operating mode on probe sensitivity	R	3.42	$\sqrt{3}$	1.97	1	1.97	∞
TAS	Time-average SAR	R	1.8	$\sqrt{3}$	1.04	1	1.04	∞
RF _{drift}	Variation in SAR due to drift in output of DUT	N	4.5	1	4.5	1	4.50	
VAL	Validation antenna uncertainty (validation measurement only)	N	1.4	1	1.4	1	1.40	
P _{in}	Uncertainty in accepted power (validation measurement only)	N	2.4	1	2.4	1	2.40	
Corrections to the SAR result (if applied)								
C(ϵ', σ)	Phantom deviation from target (ϵ', σ)	N	3.7	1	3.7	1	3.70	
C(R)	SAR scaling	R	1.8	$\sqrt{3}$	1.04	1	1.04	
u(Δ SAR)	Combined uncertainty						10.84	
U	Expanded uncertainty and effective degrees of freedom					U =	21.68	

Uncertainty Budget for System Validation (dipole & flat phantom) for 300 MHz to 800MHz

a	b	c	d	e = f(d,k)	f	g	h = c×f/e	i = c×g/e	k
Uncertainty Component	IEEE 1528 section	Tol. (±%)	Prob. Dist.	Div.	c_i (1 g)	c_i (10 g)	1g u_i (±%)	10g u_i (±%)	v_i
Measurement System									
Probe Calibration	E.2.1	6.7	N	1.00	1	1	6.7	6.7	∞
Axial Isotropy	E.2.2	4.7	R	1.73	1	1	2.7	2.7	∞
Spherical Isotropy	E.2.2	9.6	R	1.73	0	0	0.0	0.0	∞
Boundary Effect	E.2.3	1.0	R	1.73	1	1	0.6	0.6	∞
Linearity	E.2.4	4.7	R	1.73	1	1	2.7	2.7	∞
System Detection Limits	E.2.5	1.0	R	1.73	1	1	0.6	0.6	∞
Readout Electronics	E.2.6	0.3	N	1.00	1	1	0.3	0.3	∞
Response Time	E.2.7	1.1	R	1.73	1	1	0.6	0.6	∞
Integration Time	E.2.8	0.0	R	1.73	1	1	0.0	0.0	∞
RF Ambient Conditions - Noise	E.6.1	3.0	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	0.0	R	1.73	1	1	0.0	0.0	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.4	R	1.73	1	1	0.2	0.2	∞
Probe Positioning w.r.t. Phantom	E.6.3	1.4	R	1.73	1	1	0.8	0.8	∞
Max. SAR Evaluation (ext., int., avg.)	E.5	3.4	R	1.73	1	1	2.0	2.0	∞
Dipole									
Dipole Axis to Liquid Distance	8, E.4.2	2.0	R	1.73	1	1	1.2	1.2	∞
Input Power and SAR Drift Measurement	8,6.6.2	5.0	R	1.73	1	1	2.9	2.9	∞
Phantom and Tissue Parameters									
Phantom Uncertainty	E.3.1	4.0	R	1.73	1	1	2.3	2.3	∞
Liquid Conductivity (target)	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞

Liquid Conductivity (measurement)	E.3.3	3.3	R	1.73	0.64	0.43	1.2	0.8	∞
Liquid Permittivity (target)	E.3.2	5.0	R	1.73	0.6	0.49	1.7	1.4	∞
Liquid Permittivity (measurement)	E.3.3	1.9	R	1.73	0.6	0.49	0.6	0.5	∞
Combined Standard Uncertainty			RSS				10	9	99999
Expanded Uncertainty (95% CONFIDENCE LEVEL)			k=2				19	18	

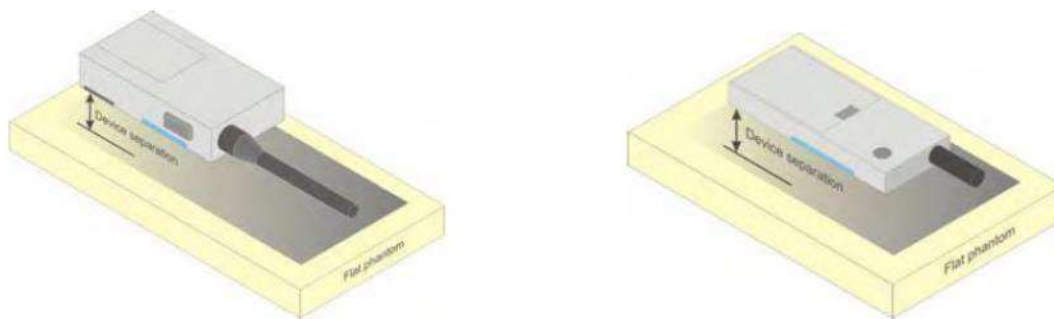
7. RF Exposure Positions

7.1. Generic device

The measurement procedures are as follows:

Front -of-face device

A typical example of a front-of-face device is a two-way radio that is held at a distance from the face of the user when transmitting. In these cases the device under test shall be positioned at the distance to the phantom surface that corresponds to the intended use as specified by the manufacturer in the user instructions (Figure 7.1). If the intended use is not specified, a separation distance of 25 mm between the phantom surface and the device shall be used.



(Figure 7.1) Two-way radios

1. Head SAR Test Considerations

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.

2. Body SAR Test Considerations for Body-worn Accessories

Body SAR is measured with the radio placed in a body-worn accessory, positioned against a flat phantom, representative of the normal operating conditions expected by users and typically with a standard default audio accessory supplied with the radio. Since audio accessories, including any default audio accessories supplied with a radio, may be designed to operate with a subset of the combinations of antennas, batteries and body-worn accessories, when a default audio accessory does not fully support all the test configurations required in this section for body-worn accessories testing an alternative audio accessory must be selected to be the default audio accessory for body-worn accessories testing.⁹ If an alternative audio accessory cannot be identified, body-worn accessories should be tested without any audio accessory.¹⁰ In general, all sides of the radio that may be positioned facing the user when using a body-worn accessory must be considered for SAR compliance.

8. RF Output Power

8.1. Walkie Talkie Output Power

Test Frequency (MHz)	ERP (dBm)	Tune-up (dBm)	Polarization
462.5625	32.19	32.50	V
462.5625	32.10	32.50	H
462.5875	31.23	32.50	V
462.5875	32.16	32.50	H
462.6375	32.12	32.50	V
462.6375	32.06	32.50	H
462.6500	32.17	32.50	V
462.6500	32.15	32.50	H

9. Antenna Location



Antenna information:

PMR Antenna	TX/RX
-------------	-------

10. Duty Cycle

The calculated SAR is obtained by the following formula:

$$\text{Reported SAR} = \text{Measured SAR} * 10(P_{\text{target}} - P_{\text{measured}}) / 10$$

$$\text{Scaling factor} = 10(P_{\text{target}} - P_{\text{measured}}) / 10$$

$$\text{Reported SAR} = \text{Measured SAR} * \text{Scaling factor}$$

Where

P_{target} is the power of manufacturing upper limit;

P_{measured} is the measured power;

Measured SAR is measured SAR at measured power which including power drift)

Reported SAR which including Power Drift and Scaling factor

Duty Cycle

Test Mode	Duty Cycle
WALKIETALKIE	50%

11. SAR Measurement Results

< Walkie Talkie >

Test Position	Test Freq.	Test Mode	Separation distance (mm)	Measured 1g SAR Value (W/kg)		Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date	Plot
				100% duty cycle	50% duty cycle						
Front of face	462.5625	FM	25	0.242	0.121	1.54	32.19	32.50	0.130	2025/10/30	2#
Front of face	462.5875	FM	25	0.224	0.112	1.25	32.16	32.50	0.121	2025/10/30	
Front of face	462.6375	FM	25	0.182	0.091	3.60	32.12	32.50	0.099	2025/10/30	
Front of face	462.6500	FM	25	0.200	0.100	-1.45	32.17	32.50	0.108	2025/10/30	
Body worn	462.5625	FM	0	1.547	0.774	-0.12	32.19	32.50	0.831	2025/10/30	1#
Body worn	462.5875	FM	0	1.345	0.673	1.87	32.16	32.50	0.727	2025/10/30	
Body worn	462.6375	FM	0	1.108	0.554	2.35	32.12	32.50	0.605	2025/10/30	
Body worn	462.6500	FM	0	1.226	0.613	1.98	32.17	32.50	0.661	2025/10/30	

Note: pre-Scan all 4 Channels, the peak SAR located on 462.5875MHz.

1. When the 1-g SAR is ≤ 3.5 W/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.
4. 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 UHF 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.

Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR

Appendix B. System Check Plots

Table of contents
#1 System Performance Check - 450MHz

#1

Date of measurement: 30/10/2025

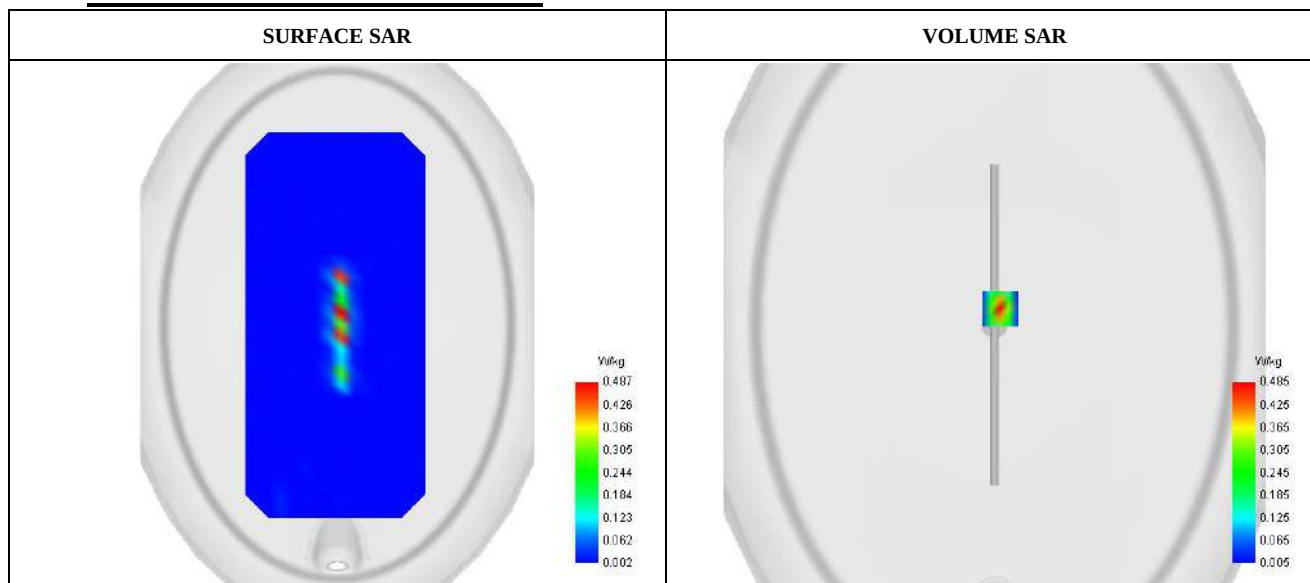
A. Experimental conditions.

Probe	SN 31/17 EPG0324
ConvF	1.56
Area Scan	dx=15mm dy=15mm, Complete
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm,Complete
Phantom	ELLI
Device Position	Dipole
Band	CW450
Channels/Frequency	Middle

B. Permittivity

Middle TX Frequency (MHz)	450.000
Relative permittivity (real part)	43.500
Relative permittivity (imaginary part)	34.800
Conductivity (S/m)	0.870

C. SAR Surface and Volume



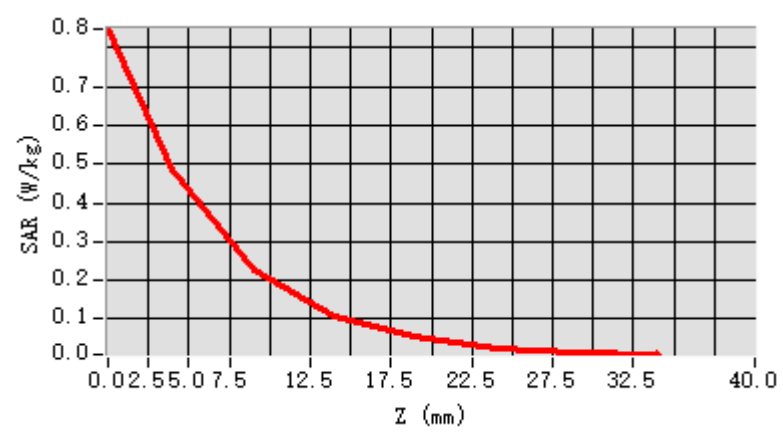
Maximum location: X=5.00, Y=15.00 ; SAR Peak: 0.84 W/kg

D. SAR 1g & 10g

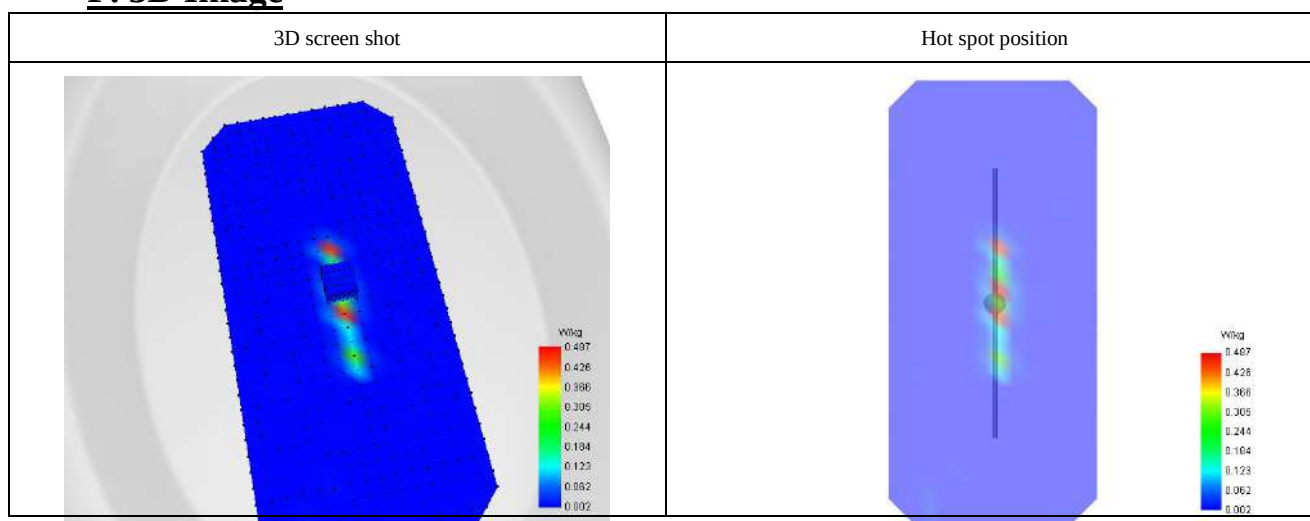
SAR 10g (W/Kg)	0.279
SAR 1g (W/Kg)	0.443
Variation (%)	0.190
Horizontal validation criteria: minimum distance (mm)	11.313708
Vertical validation criteria: SAR ratio M2/M1 (%)	46.185567

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.848	0.485	0.224	0.106	0.053	0.026	0.015



F. 3D Image



Appendix C. SAR Test Plots

Table of contents	
#1 Walkie Talkie Body worn	
#2 Walkie Talkie Front of face	

#1

Date of measurement: 30/10/2025

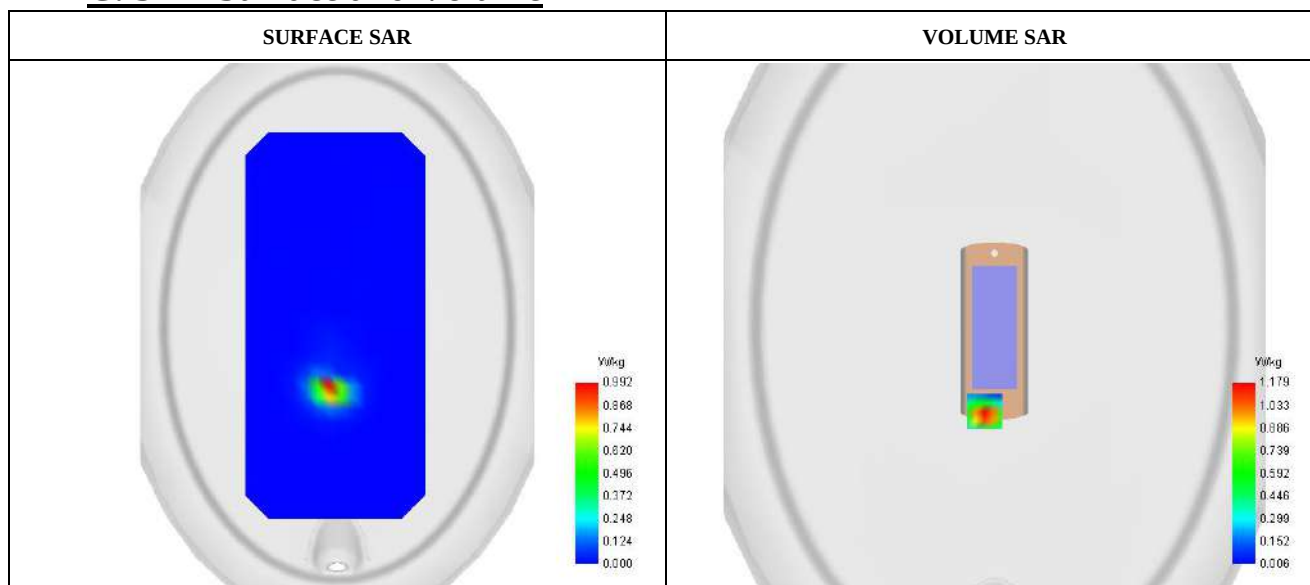
A. Experimental conditions.

Probe	SN 31/17 EPG0324
ConvF	1.56
Area Scan	dx=15mm dy=15mm, Complete
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm,Complete
Phantom	ELLI
Device Position	Body
Band	462.563
Channels/Frequency	Middle / frequency 462.563 Mhz

B. Permittivity

Middle TX Frequency (MHz)	462.563
Relative permittivity (real part)	43.548
Relative permittivity (imaginary part)	35.264
Conductivity (S/m)	0.906

C. SAR Surface and Volume



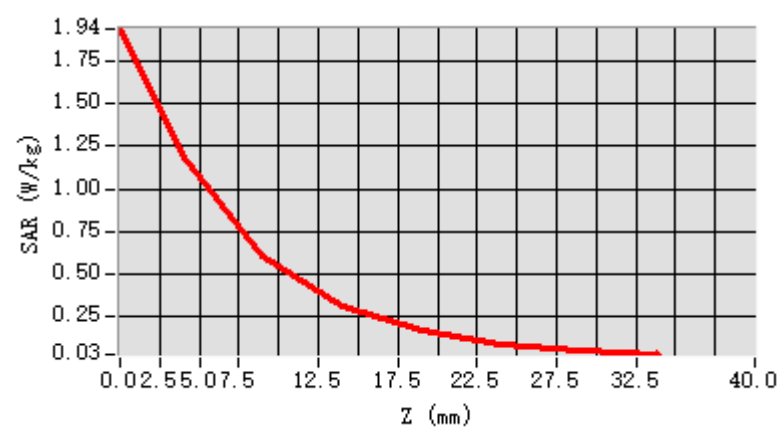
Maximum location: X=-9.00, Y=-78.00 ; SAR Peak: 2.03 W/kg

D. SAR 1g & 10g

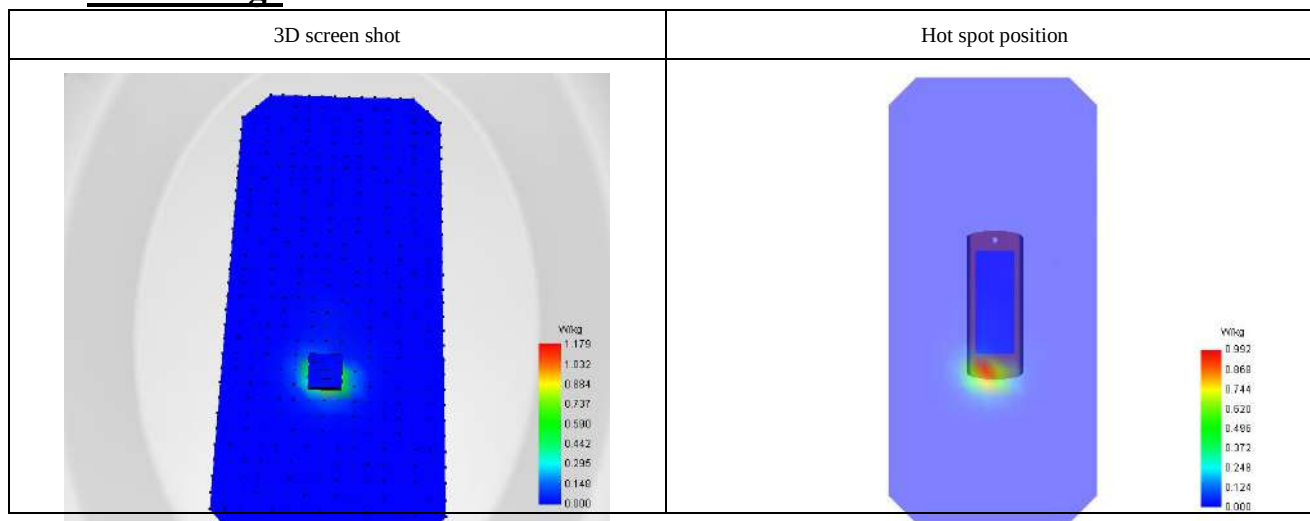
SAR 10g (W/Kg)	0.728
SAR 1g (W/Kg)	1.547
Variation (%)	-0.120
Horizontal validation criteria: minimum distance (mm)	8.000000
Vertical validation criteria: SAR ratio M2/M1 (%)	51.399491

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	1.938	1.179	0.606	0.304	0.161	0.082	0.043



F. 3D Image



#2

Date of measurement: 30/10/2025

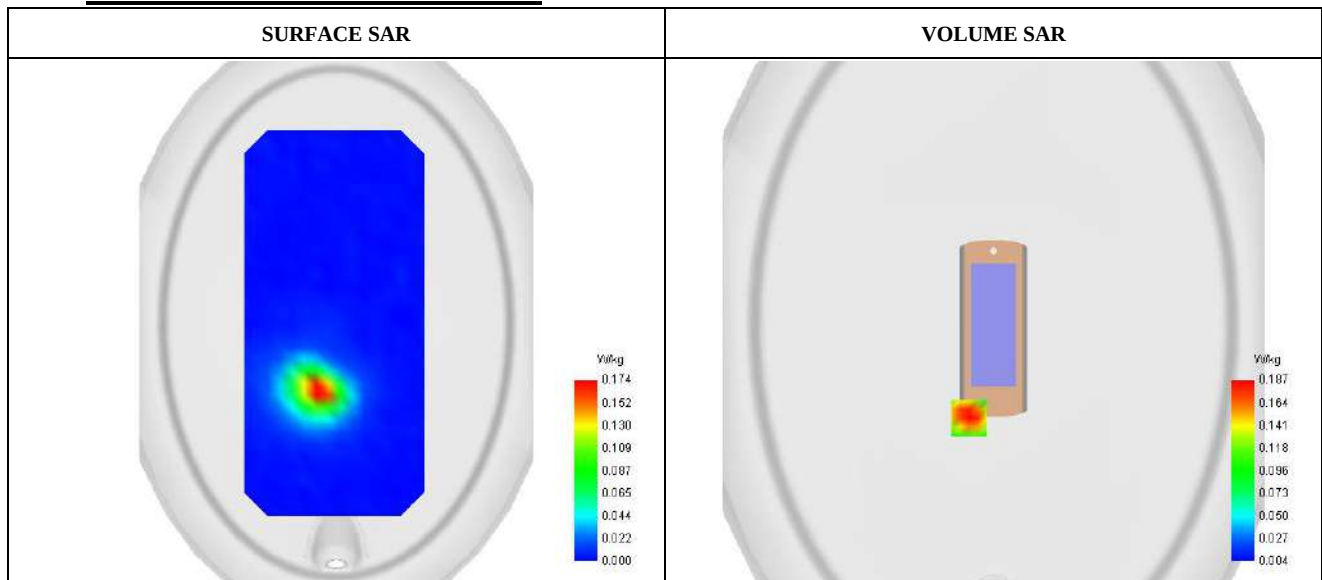
A. Experimental conditions.

Probe	SN 31/17 EPG0324
ConvF	1.56
Area Scan	dx=15mm dy=15mm, Complete
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm,Complete
Phantom	ELLI
Device Position	Body
Band	462.563
Channels/Frequency	Middle / frequency 462.563 Mhz

B. Permittivity

Middle TX Frequency (MHz)	462.563
Relative permittivity (real part)	43.548
Relative permittivity (imaginary part)	35.264
Conductivity (S/m)	0.906

C. SAR Surface and Volume



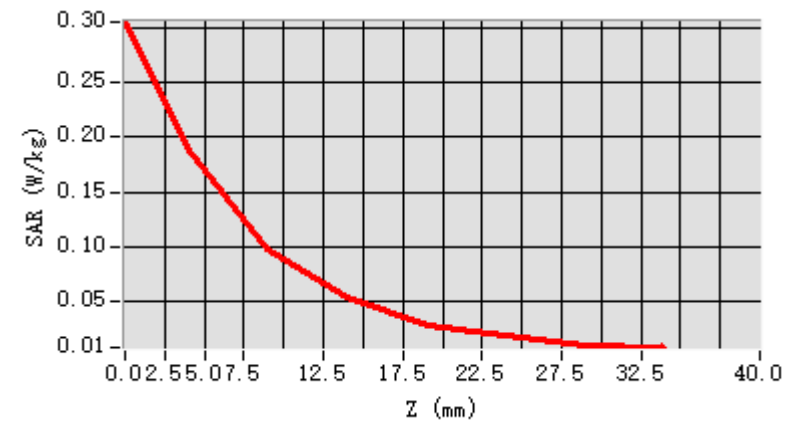
Maximum location: X=-22.00, Y=-86.00 ; SAR Peak: 0.31 W/kg

D. SAR 1g & 10g

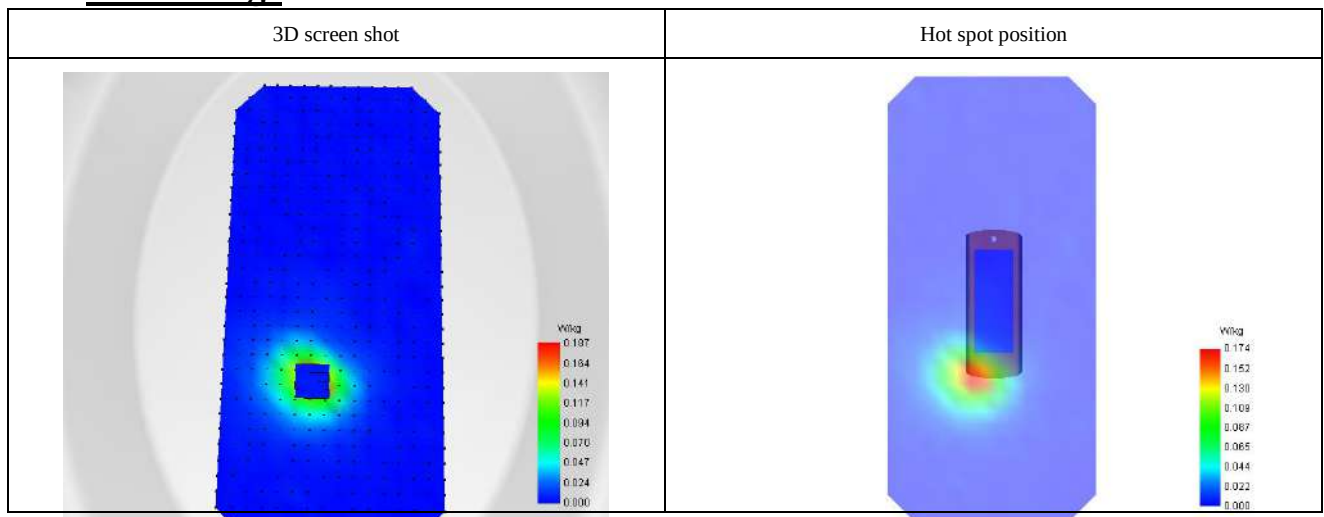
SAR 10g (W/Kg)	0.138
SAR 1g (W/Kg)	0.242
Variation (%)	1.540
Horizontal validation criteria: minimum distance (mm)	22.627417
Vertical validation criteria: SAR ratio M2/M1 (%)	52.406417

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.304	0.187	0.098	0.053	0.028	0.017	0.010



F. 3D Image



Appendix D. Calibration Certificate

Table of contents
E Field Probe - SN 31/17 EPGO324
450 MHz Dipole - SN 38/18 DIP 0G450-465



COMOSAR E-Field Probe Calibration Report

Ref : ACR.180.4.42.BES.A

**GUANGDONG ASIA HONGKE TEST
TECHNOLOGY CO., LTD**
NO.1/F,BUILDING B1, JUNFENG INDUSTRIAL PARK,
CHONGQING ROAD, HEPING COMMUNITY,
FUHAIHAI STREET, BAO'AN DISTRICT,SHENZHEN,
GUANGDONG 518055, P.R.CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: SN 31/17 EPG0324

Calibrated at MVG US
2105 Barrett Park Dr. - Kennesaw, GA 30144



Calibration Date: 09/08/2025

Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed in MVG-USA using the CALISAR / CALIBAIR test bench, for use with a COMOSAR system only. All calibration results are traceable to national metrology institutions.



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR/281.2.18.SATU.A

	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	9/07/2025	<i>JS</i>
Checked by :	Jérôme LUC	Product Manager	9/07/2025	<i>JS</i>
Approved by :	Kim RUTKOWSKI	Quality Manager	9/07/2025	<i>Kim Rutkowski</i>

	Customer Name
Distribution :	Shenzhen Asia Hongke

Issue	Date	Modifications
A	9/08/2025	Initial release



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.281.2.18.SATU.A

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR/281.2.18.SATU.A

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	SN 31/17 EPGO324
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-6GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.189 MΩ Dipole 2: R2=0.203 MΩ Dipole 3: R3=0.218 MΩ

A yearly calibration interval is recommended.

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards.



Figure 1 – MVG COMOSAR Dosimetric E field Dipole

Probe Length	330 mm
Length of Individual Dipoles	2 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	2.5 mm
Distance between dipoles / probe extremity	1 mm

3 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

3.1 LINEARITY

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



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.281.2.18.SATU.A

3.2 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards.

3.3 LOWER DETECTION LIMIT

The lower detection limit was assessed using the same measurement set up as used for the linearity measurement. The required lower detection limit is 10 mW/kg.

3.4 ISOTROPY

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

3.5 BOUNDARY EFFECT

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

4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty associated with an E-field probe calibration using the waveguide technique. All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=2$, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

Uncertainty analysis of the probe calibration in waveguide					
ERROR SOURCES	Uncertainty value (%)	Probability Distribution	Divisor	ci	Standard Uncertainty (%)
Incident or forward power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Reflected power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Liquid conductivity	5.00%	Rectangular	$\sqrt{3}$	1	2.887%
Liquid permittivity	4.00%	Rectangular	$\sqrt{3}$	1	2.309%
Field homogeneity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Field probe positioning	5.00%	Rectangular	$\sqrt{3}$	1	2.887%



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR/281.2.18.SATU.A

Field probe linearity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Combined standard uncertainty					5.831%
Expanded uncertainty 95 % confidence level k = 2					12.0%

5 CALIBRATION MEASUREMENT RESULTS

Calibration Parameters	
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

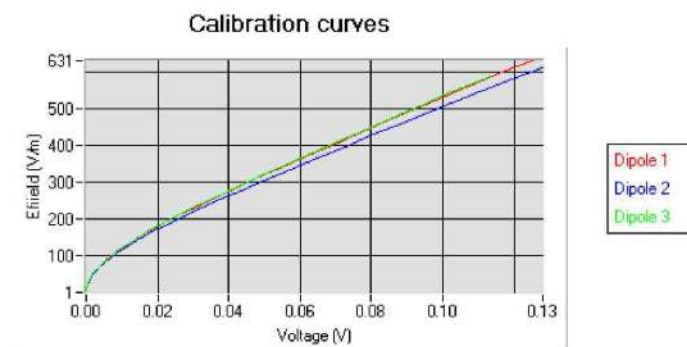
5.1 SENSITIVITY IN AIR

Normx dipole 1 ($\mu\text{V}/(\text{V}/\text{m})^2$)	Normy dipole 2 ($\mu\text{V}/(\text{V}/\text{m})^2$)	Normz dipole 3 ($\mu\text{V}/(\text{V}/\text{m})^2$)
0.80	0.83	0.68

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
95	90	93

Calibration curves $e_i=f(V)$ ($i=1,2,3$) allow to obtain H-field value using the formula:

$$E = \sqrt{E_1^2 + E_2^2 + E_3^2}$$



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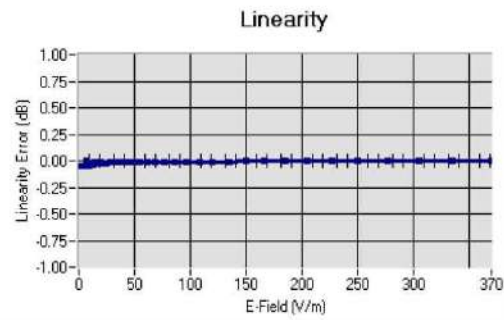
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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.281.2.18.SATU.A

5.2 LINEARITY



Linearity $\pm 1.13\%$ ($\pm 0.05\text{dB}$)

5.3 SENSITIVITY IN LIQUID

Liquid	Frequency (MHz $\pm$ 100MHz)	Permittivity	Epsilon (S/m)	ConvF
HL450	450	42.17	0.86	1.56
BL450	450	57.65	0.95	1.60
HL750	750	40.03	0.93	1.45
BL750	750	56.83	1.00	1.50
HL850	835	42.19	0.90	1.55
BL850	835	54.67	1.01	1.59
HL900	900	42.08	1.01	1.54
BL900	900	55.25	1.08	1.60
HL1800	1800	41.68	1.46	1.65
BL1800	1800	53.86	1.46	1.68
HL1900	1900	38.45	1.45	1.86
BL1900	1900	53.32	1.56	1.93
HL2000	2000	38.26	1.38	1.83
BL2000	2000	52.70	1.51	1.89
HL2300	2300	39.44	1.62	1.95
BL2300	2300	54.52	1.77	2.01
HL2450	2450	37.50	1.80	1.91
BL2450	2450	53.22	1.89	1.95
HL2600	2600	39.80	1.99	1.89
BL2600	2600	52.52	2.23	1.94
HL5200	5200	35.64	4.67	1.50
BL5200	5200	48.64	5.51	1.56
HL5400	5400	36.44	4.87	1.44
BL5400	5400	46.52	5.77	1.47
HL5600	5600	36.66	5.17	1.48
BL5600	5600	46.79	5.77	1.53
HL5800	5800	35.31	5.31	1.50
BL5800	5800	47.04	6.10	1.55

LOWER DETECTION LIMIT: 9mW/kg

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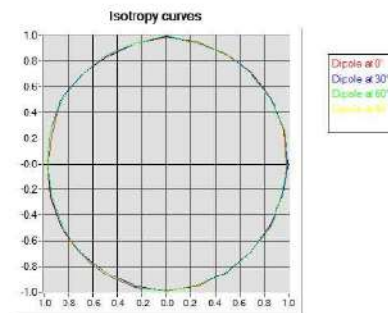
COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR/281.2.18.SATU.A

5.4 ISOTROPY

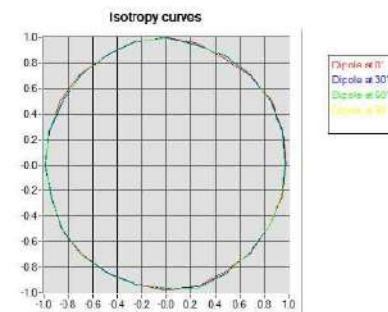
HL900 MHz

- Axial isotropy: 0.05 dB
- Hemispherical isotropy: 0.07 dB



HL1800 MHz

- Axial isotropy: 0.06 dB
- Hemispherical isotropy: 0.07 dB



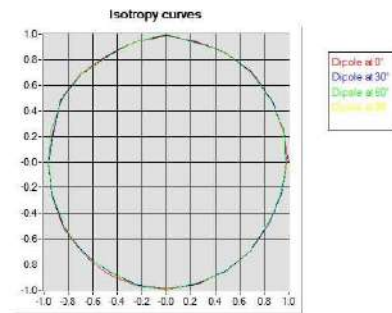


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Ref: ACR/281.2.18.SATU.A

HL5600 MHz

- Axial isotropy: 0.06 dB
- Hemispherical isotropy: 0.10 dB





COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.281.2.18.SATU.A

6 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
Flat Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2023	02/2026
Reference Probe	MVG	EP 94 SN 37/08	10/2024	10/2026
Multimeter	Keithley 2000	1188656	01/2023	01/2026
Signal Generator	Agilent E4438C	MY49070581	01/2023	01/2026
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	01/2023	01/2026
Power Sensor	HP ECP-E26A	US37181460	01/2023	01/2026
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Waveguide	Mega Industries	069Y7-158-13-712	Validated. No cal required.	Validated. No cal required.
Waveguide Transition	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.
Waveguide Termination	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Control Company	150798832	11/2023	11/2026



SAR Reference Dipole Calibration Report

Ref : ACR.273.1.18.SATU.A

**GUANGDONG ASIA HONGKE TEST
TECHNOLOGY C O., LTD**
NO.1/F,BUILDING B1, JUNFENG INDUSTRIAL PARK,
CHONGQING ROAD, HEPING COMMUNITY,
FUHAIHAI STREET, BAO'AN DISTRICT, SHENZHEN,
GUANGDONG 518055, P.R.CHINA
SATIMO COMOSAR REFERENCE DIPOLE
FREQUENCY: 450 MHZ
SERIAL NO.: SN 38/18 DIP 0G450-465

Calibrated at MVG US
2105 Barrett Park Dr. - Kennesaw, GA 30144



Calibration Date: 02/21/2025

Summary:

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



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.1.18.SATU.A

	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Jérôme LUC	Product Manager	02/22/2025	<i>JS</i>
<i>Checked by :</i>	Jérôme LUC	Product Manager	02/22/2025	<i>JS</i>
<i>Approved by :</i>	Kim RUTKOWSKI	Quality Manager	02/22/2025	<i>Kim Rutkowski</i>

	<i>Customer Name</i>
<i>Distribution :</i>	Shenzhen Asia Hongke

<i>Issue</i>	<i>Date</i>	<i>Modifications</i>
A	02/22/2025	Initial release



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.1.18.SATU.A

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.1.18.SATU.A

1 INTRODUCTION

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

2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 450 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID450
Serial Number	SN 38/18 DIP 0G450-465
Product Condition (new / used)	Used

A yearly calibration interval is recommended.

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

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



Figure 1 – MVG COMOSAR Validation Dipole



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.1.18.SATU.A

4 MEASUREMENT METHOD

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

4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards.

4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimensions frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness.

5 MEASUREMENT UNCERTAINTY

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

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.1 dB

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

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

5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %



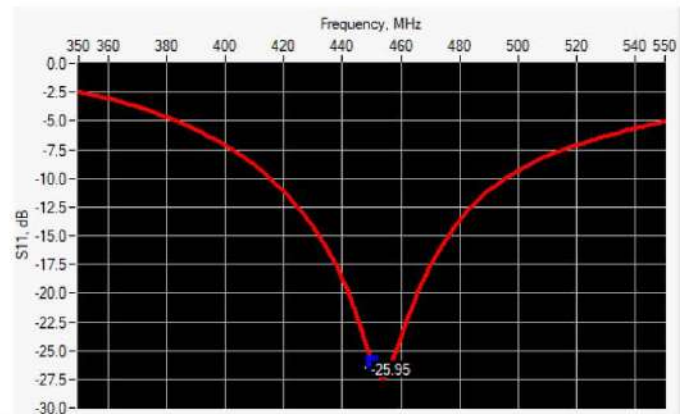
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.273.1.18.SATU.A

10 g	20.1 %
------	--------

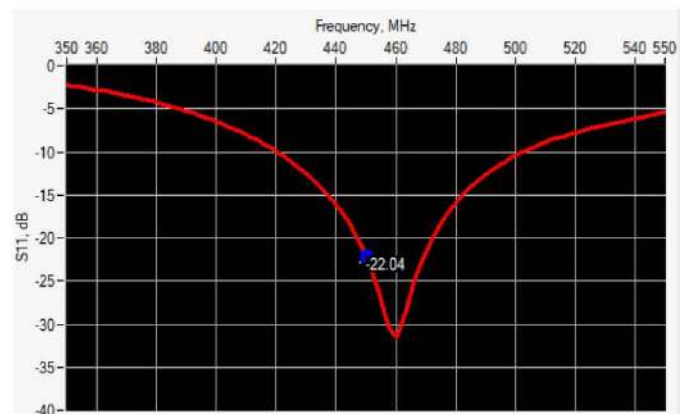
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
450	-25.95	-20	45.0 Ω - 0.5 j Ω

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
450	-22.04	-20	42.9 Ω + 3.4 j Ω

6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	420.0 $\pm$ 1 %		250.0 $\pm$ 1 %		6.35 $\pm$ 1 %	

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450	290.0 ±1 %.	PASS	166.7 ±1 %.	PASS	6.35 ±1 %.	PASS
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.		39.5 ±1 %.		3.6 ±1 %.	
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.		30.4 ±1 %.		3.6 ±1 %.	
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3500	37.0 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7 ±1 %.		26.4 ±1 %.		3.6 ±1 %.	

7 VALIDATION MEASUREMENT

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

7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r')		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 ±5 %		0.87 ±5 %	
450	43.5 ±5 %	PASS	0.87 ±5 %	PASS
750	41.9 ±5 %		0.89 ±5 %	
835	41.5 ±5 %		0.90 ±5 %	
900	41.5 ±5 %		0.97 ±5 %	
1450	40.5 ±5 %		1.20 ±5 %	
1500	40.4 ±5 %		1.23 ±5 %	
1640	40.2 ±5 %		1.31 ±5 %	
1750	40.1 ±5 %		1.37 ±5 %	

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1800	40.0 ±5 %		1.40 ±5 %	
1900	40.0 ±5 %		1.40 ±5 %	
1950	40.0 ±5 %		1.40 ±5 %	
2000	40.0 ±5 %		1.40 ±5 %	
2100	39.8 ±5 %		1.49 ±5 %	
2300	39.5 ±5 %		1.67 ±5 %	
2450	39.2 ±5 %		1.80 ±5 %	
2600	39.0 ±5 %		1.96 ±5 %	
3000	38.5 ±5 %		2.40 ±5 %	
3500	37.9 ±5 %		2.91 ±5 %	

7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

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

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Head Liquid Values: ϵ_{ps} : 42.2 sigma : 0.86
Distance between dipole center and liquid	15.0 mm
Area scan resolution	$dx=8mm/dy=8mm$
Zoon Scan Resolution	$dx=8mm/dy=8mm/dz=5mm$
Frequency	450 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58	4.70 (0.47)	3.06	3.01 (0.30)
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	

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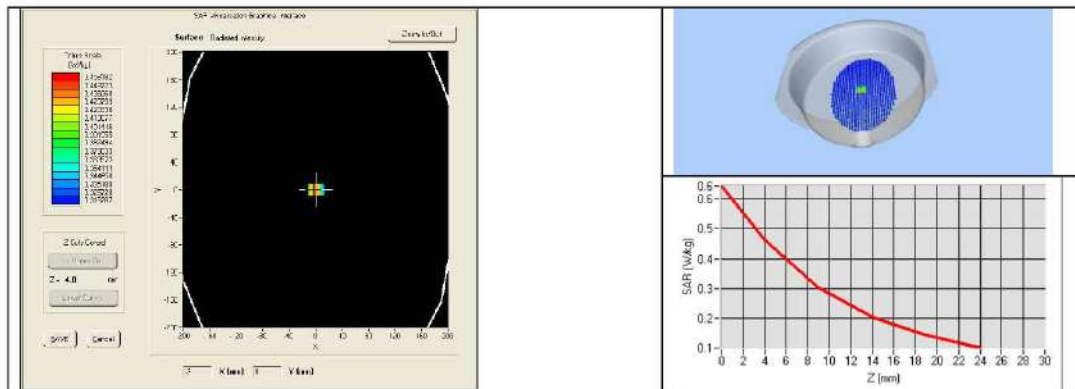
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1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	
3700	67.4		24.2	



7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ϵ_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 $\pm$ 5 %		0.80 $\pm$ 5 %	
300	58.2 $\pm$ 5 %		0.92 $\pm$ 5 %	
450	56.7 $\pm$ 5 %	PASS	0.94 $\pm$ 5 %	PASS
750	55.5 $\pm$ 5 %		0.96 $\pm$ 5 %	
835	55.2 $\pm$ 5 %		0.97 $\pm$ 5 %	
900	55.0 $\pm$ 5 %		1.05 $\pm$ 5 %	
915	55.0 $\pm$ 5 %		1.06 $\pm$ 5 %	
1450	54.0 $\pm$ 5 %		1.30 $\pm$ 5 %	
1610	53.8 $\pm$ 5 %		1.40 $\pm$ 5 %	
1800	53.3 $\pm$ 5 %		1.52 $\pm$ 5 %	
1900	53.3 $\pm$ 5 %		1.52 $\pm$ 5 %	
2000	53.3 $\pm$ 5 %		1.52 $\pm$ 5 %	
2100	53.2 $\pm$ 5 %		1.62 $\pm$ 5 %	

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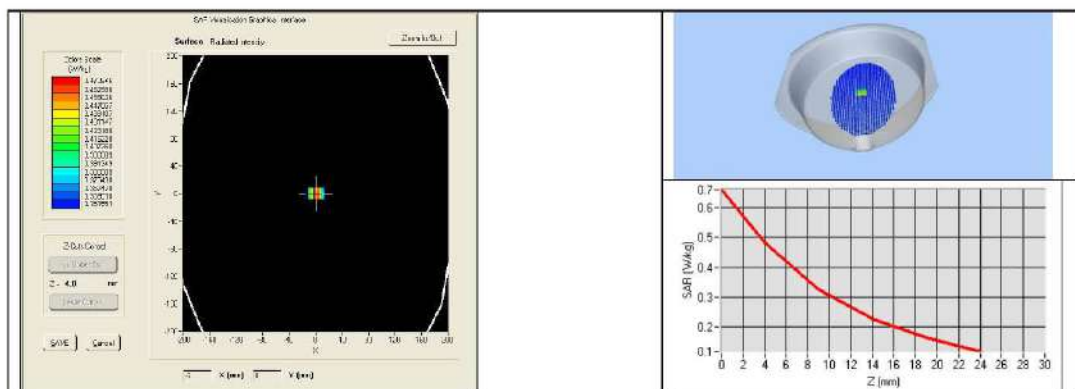
Ref: ACR.273.1.18.SATU.A

2300	52.9 ±5 %		1.81 ±5 %	
2450	52.7 ±5 %		1.95 ±5 %	
2600	52.5 ±5 %		2.16 ±5 %	
3000	52.0 ±5 %		2.73 ±5 %	
3500	51.3 ±5 %		3.31 ±5 %	
3700	51.0 ±5 %		3.55 ±5 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
5800	48.2 ±10 %		6.00 ±10 %	

7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Body Liquid Values: eps' : 57.6 sigma : 0.95
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	450 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	1 g SAR (W/kg/W)	10 g SAR (W/kg/W)
	measured	measured
450	4.80 (0.48)	3.15 (0.31)



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8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date
SAM Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVA	SN100132	08/2022	08/2025
Calipers	Carrera	CALIPER-01	12/2023	12/2026
Reference Probe	MVG	EPG122 SN 18/11	10/2024	10/2025
Multimeter	Keithley 2000	1188656	12/2022	12/2025
Signal Generator	Agilent E4438C	MY49070561	12/2022	12/2025
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	12/2022	12/2025
Power Sensor	HP ECP-E26A	US37181460	12/2022	12/2025
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature and Humidity Sensor	Control Company	150798832	8/2022	8/2025

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