Docusign Envelope ID: B9F2DB03-1600-44DE-BB82-C27B1DB45E57

COMOSAR E-Field Probe Calibration Report

Ref : ACR.78.3.26.PAR.A

BTF TESTING LAB (SHENZHEN) CO., LTD.

F101,201 AND 301, BUILDING 1, BLOCK 2, TANTOU INDUSTRIAL PARK, TANTOU COMMUNITY SONGGANG STREET, BAO'AN DISTRICT, SHENZHEN, CHINA

MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: 0125-EPGO-445

Calibrated at MVG

13 Rue du Zephyr

91140 Villejust - FRANCE

Calibration date: 03/03/2026

ACCREDITED

CERT #2246.03

Scope available on :https://a2la.org/

Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).

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	Name	*Function*	*Date*	*Signature*
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Distribution :	BTF Testing Lab (Shenzhen) Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	3/18/2026	Initial release

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1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	0125-EPGO-445
Product Condition (new / used)	Used
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.206 MΩ Dipole 2: R2=0.207 MΩ Dipole 3: R3=0.226 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards.

Figure 1 – *MVG COMOSAR Dosimetric E field Probe*

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 IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their effect. All calibrations / measurements performed meet the fore-mentioned standards.

3.1 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 for frequency range 600-7500MHz and using the calorimeter cell method (transfer method) as outlined in the standards for frequency 150-450 MHz.

3.2 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.

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3.3 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 to 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°).

3.4 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.

The boundary effect uncertainty can be estimated according to the following uncertainty approximation formula based on linear and exponential extrapolations between the surface and d_{be} + d_{step} along lines that are approximately normal to the surface:

$$\mathrm{SAR}_{\mathrm{uncertainty}}[\%] = \delta\mathrm{SAR}_{be}\frac{(d_{be}+d_{step})^2}{2d_{step}}\frac{\left(e^{-d_{be}/(\delta/2)}\right)}{\delta/2} \quad \text{for } (d_{be}+d_{step}) < 10\text{ mm}$$

where

$\mathrm{SAR}_{\mathrm{uncertainty}}$	is the uncertainty in percent of the probe boundary effect
d_{be}	is the distance between the surface and the closest *zoom-scan* measurement point, in millimetre
Δ_{step}	is the separation distance between the first and second measurement points that are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible
δ	is the minimum penetration depth in millimetres of the head tissue-equivalent liquids defined in this standard, i.e., $\delta \approx 14$ mm at 3 GHz;
$\Delta\mathrm{SAR}_{be}$	in percent of SAR is the deviation between the measured SAR value, at the distance d_{be} from the boundary, and the analytical SAR value.

The measured worst case boundary effect SARuncertainty[%] for scanning distances larger than 4mm is 1.0% (Limit ,2%).

3.5 PROBE MODULATION RESPONSE

MVG's probe were evaluated experimentally with various modulated signal and the deviation from CW response were found neglectable in the used power range of the probe. So the correction to taking into account the linearization parameters for different modulation is null, therefore the CW factor given in this report can be used whatever the measured modulation

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4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with a SAR probe calibration using the waveguide or calorimetric cell technique depending on the frequency.

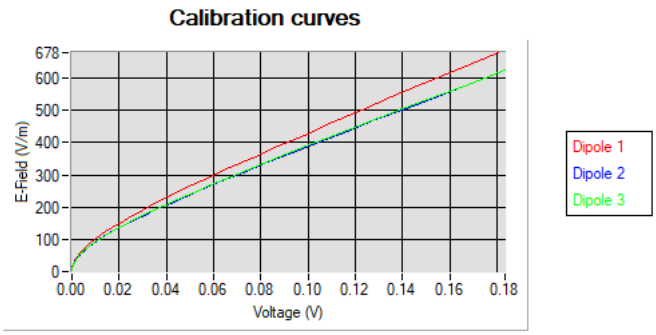
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

Ambient condition	
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

5.1 CALIBRATION IN AIR

The following curve represents the measurement in waveguide of the voltage picked up by the probe toward the E-field generated inside the waveguide.



From this curve, the sensitivity in air is calculated using the below formula.

$$E^2 = \sum_{i=1}^{3} \frac{V_i\left(1 + {V_i}/{DCP_i}\right)}{Norm_i}$$

where
Vi=voltage readings on the 3 channels of the probe
DCPi=diode compression point given below for the 3 channels of the probe
Normi=dipole sensitivity given below for the 3 channels of the probe

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Normx dipole 1 (µV/(V/m)^2)	Normy dipole 2 (µV/(V/m)^2)	Normz dipole 3 (µV/(V/m)^2)
1.04	1.27	1.22

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
111	110	117

5.2 CALIBRATION IN LIQUID

The calorimeter cell or the waveguide is used to determine the calibration in liquid using the formula below.

$$ConvF = \frac{E_{liquid}^2}{E_{air}^2}$$

The E-field in the liquid is determined from the SAR measurement according to the below formula.

$$E_{liquid}^2 = \frac{\rho\, SAR}{\sigma}$$

where
σ=the conductivity of the liquid
ρ=the volumetric density of the liquid
SAR=the SAR measured from the formula that depends on the setup used. The SAR formulas are given below

For the calorimeter cell (150-450 MHz), the formula is:

$$SAR = c\frac{dT}{dt}$$

where
c=the specific heat for the liquid
dT/dt=the temperature rises over the time

For the waveguide setup (600-75000 MHz), the formula is:

$$SAR = \frac{4P_W}{ab\delta} e^{\frac{-2z}{\delta}}$$

where
a=the larger cross-sectional of the waveguide
b=the smaller cross-sectional of the waveguide
δ=the skin depth for the liquid in the waveguide
Pw=the power delivered to the liquid

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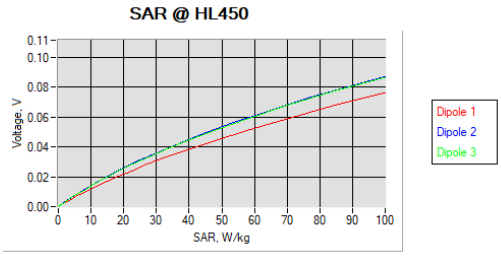
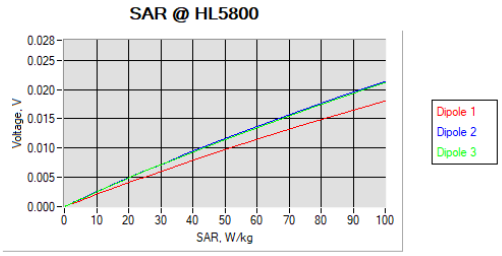
The below table summarize the ConvF for the calibrated liquid. The curves give examples for the measured SAR depending on the voltage in some liquid.

Liquid	Frequency (MHz*)	ConvF
HL450	450	1.03
HL750	750	1.21
HL835	835	1.15
HL1800	1800	0.88
HL1900	1900	1.27
HL2000	2000	1.27
HL2100	2100	1.29
HL2300	2300	0.91
HL2450	2450	1.31
HL2600	2600	1.26
HL3500	3500	1.06
HL3700	3700	1.05
HL3900	3900	1.09
HL4200	4200	1.13
HL4600	4600	1.15
HL4900	4900	1.09
HL5200	5200	1.16
HL5400	5400	1.15
HL5600	5600	0.99
HL5800	5800	1.10

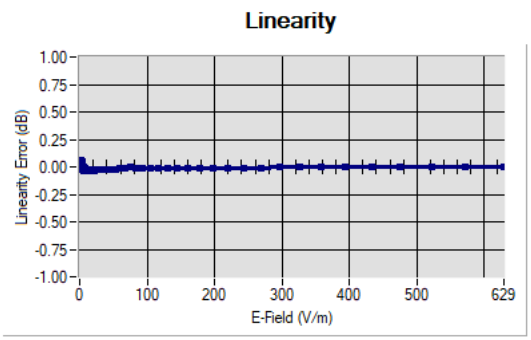
(*) Frequency validity is +/-50MHz below 600MHz, +/-100MHz from 600MHz to 6GHz and +/-700MHz above 6GHz



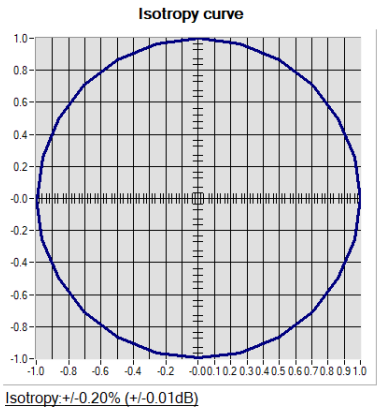


6 VERIFICATION RESULTS

The figures below represent the measured linearity and axial isotropy for this probe. The probe specification is +/-0.2 dB for linearity and +/-0.15 dB for axial isotropy.



Linearity:+/-1.55% (+/-0.07dB)



Isotropy:+/-0.20% (+/-0.01dB)

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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZND	1328.5170K92-100497-kX	12/2025	08/2028
Network Analyzer – Calibration kit	Keysight 85052D	85052D MY61410029	06/2024	06/2027
Multimeter	Keithley 2000	4013982	02/2023	02/2027
Signal Generator	Rohde & Schwarz SMB	183277	05/2022	05/2027
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	01/2026	01/2029
USB Sensor	Keysight U2000A	SN: MY62340002	10/2024	10/2027
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Fluoroptic Thermometer	LumaSense Luxtron 812	94264	09/2022	09/2026
Coaxial cell	MVG	SN 32/16 COAXCELL_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG2_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G600_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.

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Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG14_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_7G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44235403	02/2024	02/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.148.5.25.BES.A

BTF TESTING LAB (SHENZHEN) CO., LTD.

F101,201 AND 301, BUILDING 1, BLOCK 2, TANTOU INDUSTRIAL PARK, TANTOU COMMUNITY

SONGGANG STREET, BAO'AN DISTRICT, SHENZHEN, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 750 MHZ

SERIAL NO.: 0722-DIP0G750-655

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 05/26/2025

Accreditations #2-6789 and #2-6814
Scope available on www.cofrac.fr

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Summary:

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

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	Name	*Function*	*Date*	*Signature*
Prepared by :	Pedro Ruiz	Technical Manager	6/2/2025	
Checked & approved by:	Pedro Ruiz	Technical Manager	6/2/2025	
Authorized by:	Kim Rutkowski	Quality Manager	6/4/2025	Signed by: Kimberley ROTKOWSKI 2B689547AD17461...

	Customer Name
Distribution :	BTF Testing Lab (Shenzhen) Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	6/2/2025	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 750 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID750
Serial Number	0722-DIP0G750-655
Product Condition (new / used)	Used

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only, however, being built in accordance to relevant standards, it can be used in others SAR test benches as long as the final user take care that the prescribed S11 and SAR target value are met.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

4.1 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's 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. A direct method is used with a ISO17025 calibrated caliper.

4.2 S11 PARAMETER REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a S11 of -20 dB or better. The S11 measurement shall be performed against a liquid filled flat phantom and using a prescribed spacer, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

4.3 SAR REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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.

5 MEASUREMENT UNCERTAINTY

5.1 MECHANICAL DIMENSIONS

For the measurement in the range 0-300mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.20 mm with respect to measurement conditions.

For the measurement in the range 300-450mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.44 mm with respect to measurement conditions.

5.2 S11 PARAMETER

The estimated expanded uncertainty (k=2) in calibration for the S11 parameter in linear is +/-0.08 with respect to measurement conditions.

5.3 SAR

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.

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The estimated expanded uncertainty (k=2) in calibration for the 1g and 10g SAR measurement in W/kg is +/-19% with respect to measurement conditions.

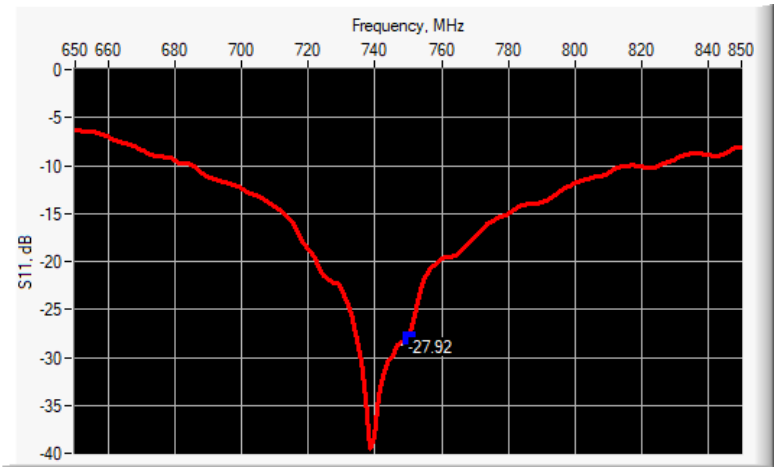
6 CALIBRATION RESULTS

6.1 MECHANICAL DIMENSIONS

L mm		h mm		d mm	
Measured	**Required**	**Measured**	**Required**	**Measured**	**Required**
-	176.00 +/- 2%	-	100.00 +/- 2%	-	6.35 +/- 2%

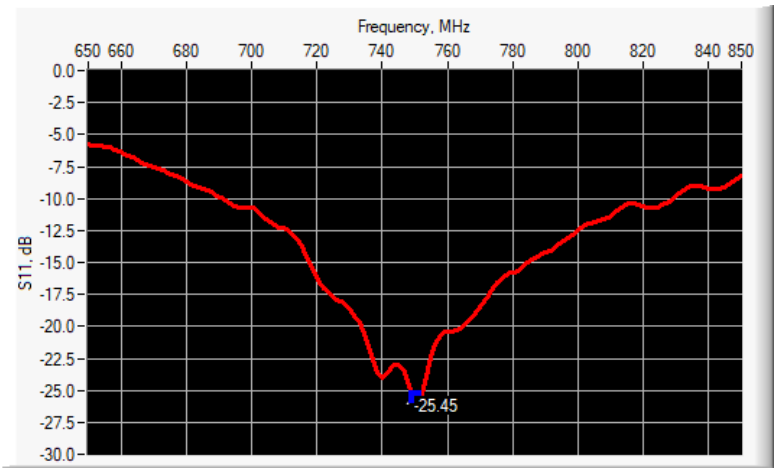
6.2 S11 PARAMETER

6.2.1 S11 parameter in Head Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
750	-27.92	-20	53.6Ω + 1.4jΩ

6.2.2 S11 parameter in Body Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
750	-25.45	-20	50.7Ω + 5.0jΩ

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6.3 SAR

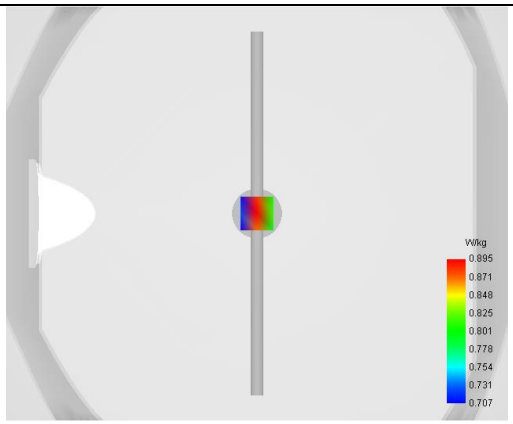
The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, 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 by using a prescribed spacer.

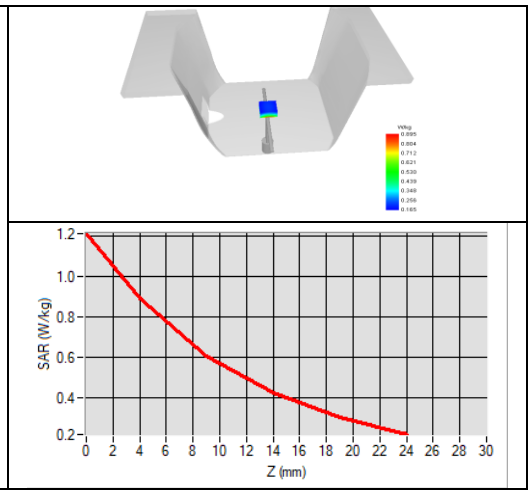
6.3.1 SAR with Head Liquid

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 V5
Phantom	SN 13/09 SAM68
Probe	4424-EPGO-443
Liquid	Head Liquid Values: eps' : 44.6 sigma : 0.88
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	750 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
750 MHz	0.84	8.41	8.49	0.55	5.55	5.55





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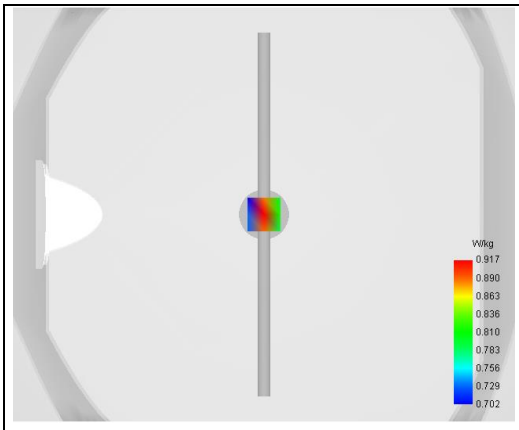
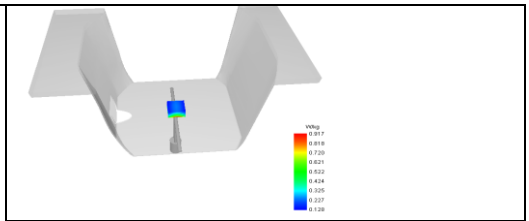
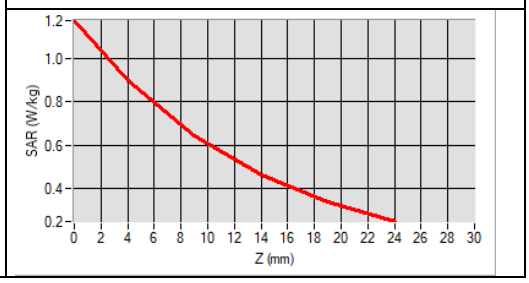
6.3.2 SAR with Body Liquid

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 4424-EPGO-443
Liquid	Body Liquid Values: eps' : 56.1 sigma : 0.93
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	750
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
750 MHz	0.85	8.48	8.60	0.57	5.68	5.70







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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2026
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2027
Calipers	Mitutoyo	SN 0009732	11/2022	11/2025
Reference Probe	MVG	4424-EPGO-443	05/2025	05/2026
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	183277	05/2022	05/2026
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2026
Power Meter	Keysight U2000A	SN: MY62340002	10/2024	10/2027
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44235403	10/2024	10/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.148.7.25.BES.A

BTF TESTING LAB (SHENZHEN) CO., LTD.

F101,201 AND 301, BUILDING 1, BLOCK 2, TANTOU INDUSTRIAL PARK, TANTOU COMMUNITY

SONGGANG STREET, BAO'AN DISTRICT, SHENZHEN, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 1800 MHZ

SERIAL NO.: 0722-DIP1G800-657

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 05/26/2025

Accreditations #2-6789 and #2-6814
Scope available on www.cofrac.fr

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Summary:

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

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	Name	*Function*	*Date*	*Signature*
Prepared by :	Pedro Ruiz	Technical Manager	6/2/2025	
Checked & approved by:	Pedro Ruiz	Technical Manager	6/2/2025	
Authorized by:	Kim Rutkowski	Quality Manager	6/4/2025	Signed by: Kimberley ROTKOWSKI 2B689547AD17461...

	Customer Name
Distribution :	BTF Testing Lab (Shenzhen) Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	6/2/2025	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 1800 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1800
Serial Number	0722-DIP1G800-657
Product Condition (new / used)	Used

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only, however, being built in accordance to relevant standards, it can be used in others SAR test benches as long as the final user take care that the prescribed S11 and SAR target value are met.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

4.1 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's 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. A direct method is used with a ISO17025 calibrated caliper.

4.2 S11 PARAMETER REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a S11 of -20 dB or better. The S11 measurement shall be performed against a liquid filled flat phantom and using a prescribed spacer, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

4.3 SAR REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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.

5 MEASUREMENT UNCERTAINTY

5.1 MECHANICAL DIMENSIONS

For the measurement in the range 0-300mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.20 mm with respect to measurement conditions.

For the measurement in the range 300-450mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.44 mm with respect to measurement conditions.

5.2 S11 PARAMETER

The estimated expanded uncertainty (k=2) in calibration for the S11 parameter in linear is +/-0.08 with respect to measurement conditions.

5.3 SAR

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.

The estimated expanded uncertainty (k=2) in calibration for the 1g and 10g SAR measurement in W/kg is +/-19% with respect to measurement conditions.

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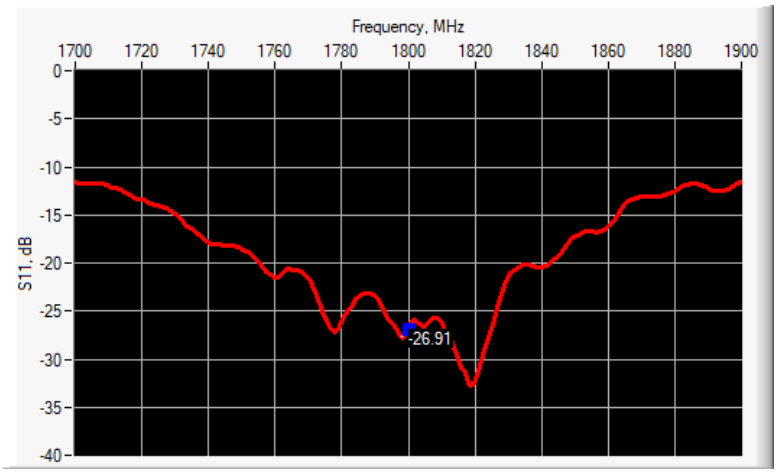
6 CALIBRATION RESULTS

6.1 MECHANICAL DIMENSIONS

L mm		h mm		d mm	
Measured	**Required**	**Measured**	**Required**	**Measured**	**Required**
-	72.00 +/- 2%	-	41.70 +/- 2%	-	3.60 +/- 2%

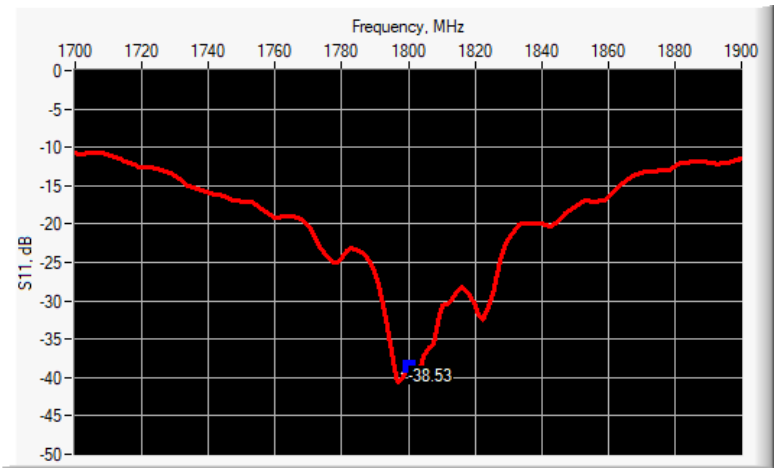
6.2 S11 PARAMETER

6.2.1 S11 parameter in Head Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
1800	-26.91	-20	50.8Ω + 4.3jΩ

6.2.2 S11 parameter in Body Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
1800	-38.53	-20	51.1Ω - 0.3jΩ

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6.3 SAR

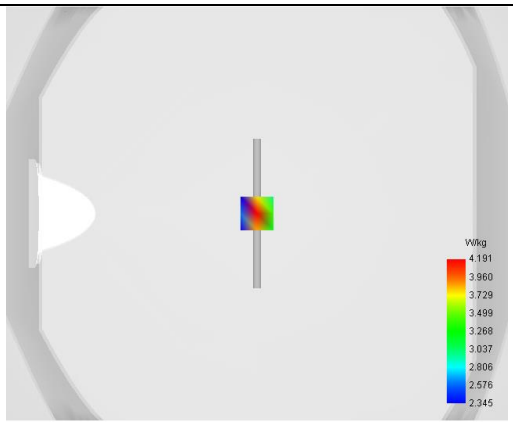
The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, 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 by using a prescribed spacer.

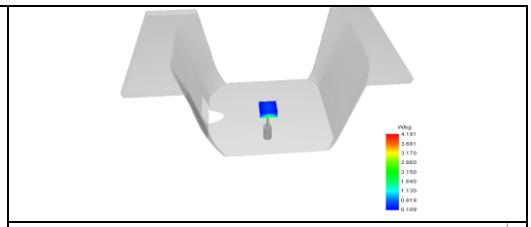
6.3.1 SAR with Head Liquid

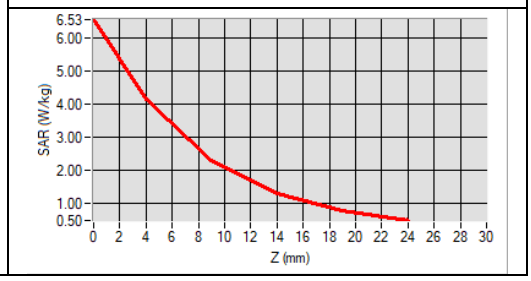
The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	4424-EPGO-443
Liquid	Head Liquid Values: eps' : 42.2 sigma : 1.39
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1800 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
1800 MHz	3.79	37.93	38.40	1.98	19.83	20.10







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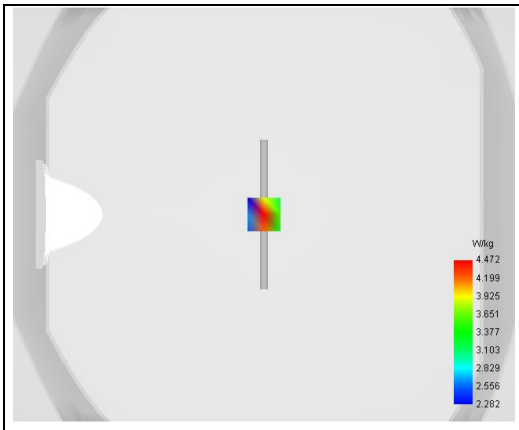
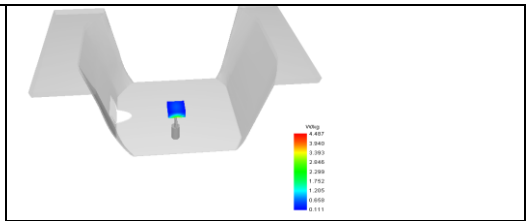
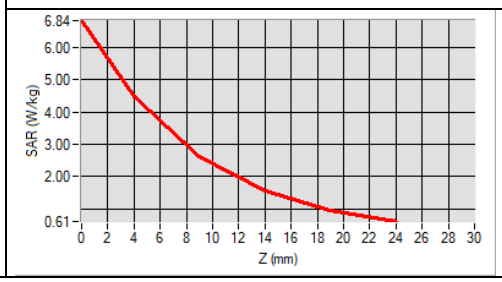
6.3.2 SAR with Body Liquid

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 4424-EPGO-443
Liquid	Body Liquid Values: eps' : 53.9 sigma : 1.49
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1800
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
1800 MHz	4.07	40.68	38.50	2.15	21.48	20.30







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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2026
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2027
Calipers	Mitutoyo	SN 0009732	11/2022	11/2025
Reference Probe	MVG	4424-EPGO-443	05/2025	05/2026
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	183277	05/2022	05/2026
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2026
Power Meter	Keysight U2000A	SN: MY62340002	10/2024	10/2027
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44235403	10/2024	10/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.148.8.25.BES.A

BTF TESTING LAB (SHENZHEN) CO., LTD.

F101,201 AND 301, BUILDING 1, BLOCK 2, TANTOU INDUSTRIAL PARK, TANTOU COMMUNITY

SONGGANG STREET, BAO'AN DISTRICT, SHENZHEN, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 1900 MHZ

SERIAL NO.: 4721-DIP1G900-658

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 05/26/2025

Accreditations #2-6789 and #2-6814
Scope available on www.cofrac.fr

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Summary:

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

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	Name	*Function*	*Date*	*Signature*
Prepared by :	Pedro Ruiz	Technical Manager	5/28/2025	
Checked & approved by:	Pedro Ruiz	Technical Manager	5/28/2025	
Authorized by:	Kim Rutkowski	Quality Manager	6/4/2025	Signed by: Kimberley ROTKOWSKI 2B689547AD17461...

	Customer Name
Distribution :	BTF Testing Lab (Shenzhen) Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	5/28/2025	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 1900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1900
Serial Number	4721-DIP1G900-658
Product Condition (new / used)	Used

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only, however, being built in accordance to relevant standards, it can be used in others SAR test benches as long as the final user take care that the prescribed S11 and SAR target value are met.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

4.1 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's 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. A direct method is used with a ISO17025 calibrated caliper.

4.2 S11 PARAMETER REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a S11 of -20 dB or better. The S11 measurement shall be performed against a liquid filled flat phantom and using a prescribed spacer, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

4.3 SAR REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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.

5 MEASUREMENT UNCERTAINTY

5.1 MECHANICAL DIMENSIONS

For the measurement in the range 0-300mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.20 mm with respect to measurement conditions.

For the measurement in the range 300-450mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.44 mm with respect to measurement conditions.

5.2 S11 PARAMETER

The estimated expanded uncertainty (k=2) in calibration for the S11 parameter in linear is +/-0.08 with respect to measurement conditions.

5.3 SAR

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.

The estimated expanded uncertainty (k=2) in calibration for the 1g and 10g SAR measurement in W/kg is +/-19% with respect to measurement conditions.

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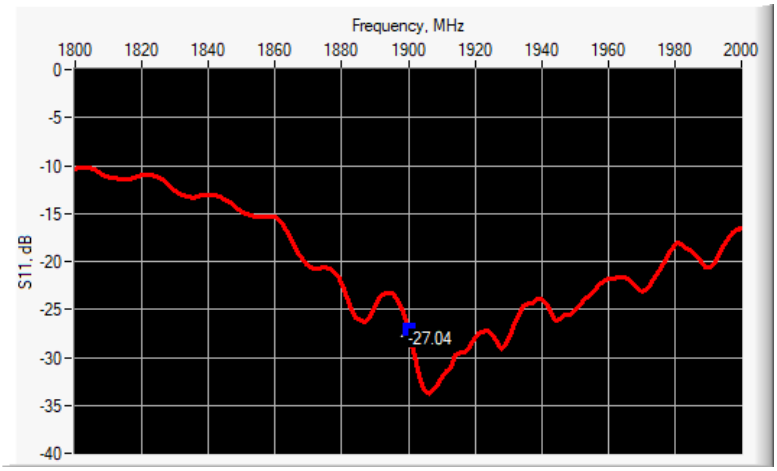
6 CALIBRATION RESULTS

6.1 MECHANICAL DIMENSIONS

L mm		h mm		d mm	
Measured	**Required**	**Measured**	**Required**	**Measured**	**Required**
-	68.00 +/- 2%	-	39.50 +/- 2%	-	3.60 +/- 2%

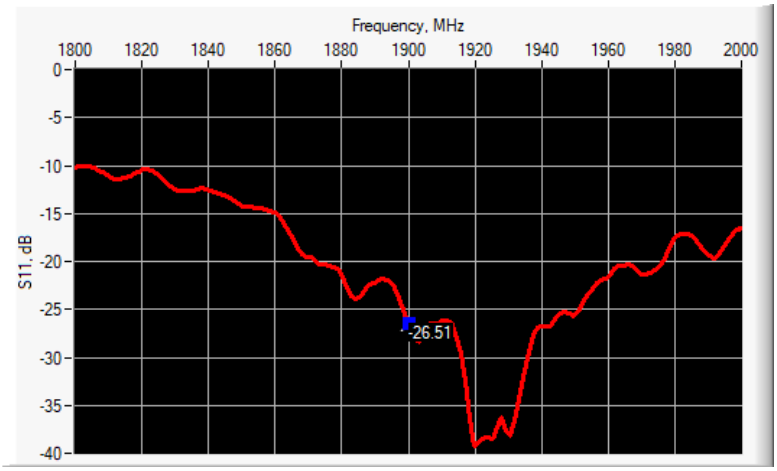
6.2 S11 PARAMETER

6.2.1 S11 parameter in Head Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
1900	-27.04	-20	50.8Ω - 4.3jΩ

6.2.2 S11 parameter in Body Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
1900	-26.51	-20	47.3Ω - 3.6jΩ

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6.3 SAR

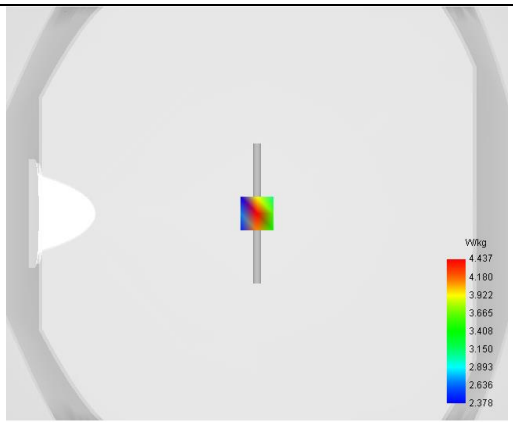
The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, 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 by using a prescribed spacer.

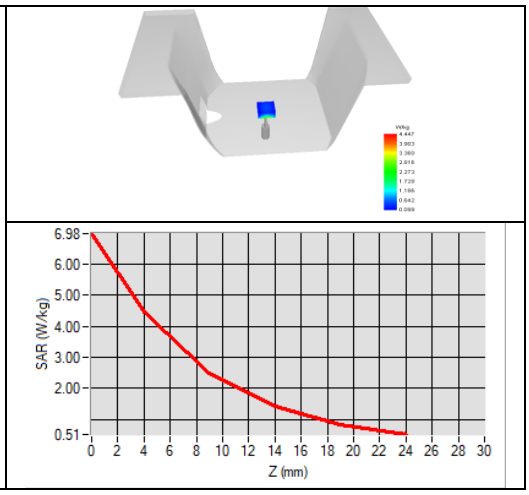
6.3.1 SAR with Head Liquid

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 V5
Phantom	SN 13/09 SAM68
Probe	4424-EPGO-443
Liquid	Head Liquid Values: eps' : 42.4 sigma : 1.39
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
1900 MHz	4.03	40.29	39.70	2.08	20.82	20.50





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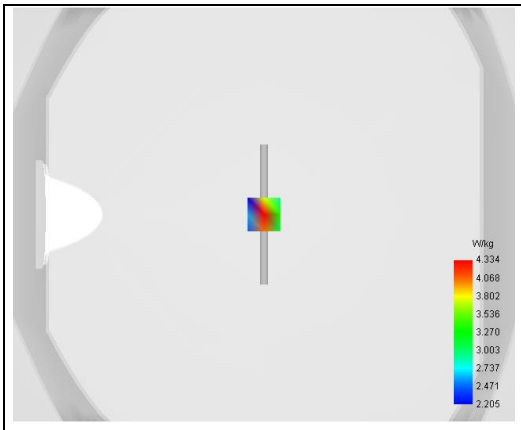
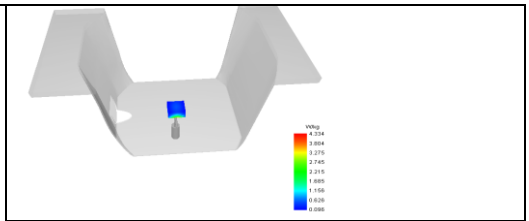
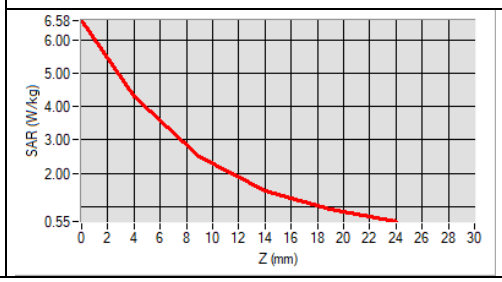
6.3.2 SAR with Body Liquid

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 4424-EPGO-443
Liquid	Body Liquid Values: eps' : 54.0 sigma : 1.50
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
1900 MHz	3.89	38.93	39.80	2.03	20.29	20.80







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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2026
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2027
Calipers	Mitutoyo	SN 0009732	11/2022	11/2025
Reference Probe	MVG	4424-EPGO-443	05/2025	05/2026
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	183277	05/2022	05/2026
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2026
Power Meter	Keysight U2000A	SN: MY62340002	10/2024	10/2027
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44235403	10/2024	10/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.148.12.25.BES.A

BTF TESTING LAB (SHENZHEN) CO., LTD.

F101,201 AND 301, BUILDING 1, BLOCK 2, TANTOU INDUSTRIAL PARK, TANTOU COMMUNITY

SONGGANG STREET, BAO'AN DISTRICT, SHENZHEN, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 2450 MHZ

SERIAL NO.: 0722-DIP2G450-662

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 05/26/2025

Accreditations #2-6789 and #2-6814
Scope available on www.cofrac.fr

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Summary:

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

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	Name	*Function*	*Date*	*Signature*
Prepared by :	Pedro Ruiz	Technical Manager	5/28/2025	
Checked & approved by:	Pedro Ruiz	Technical Manager	5/28/2025	
Authorized by:	Kim Rutkowski	Quality Manager	6/4/2025	Signed by: Kimberley ROTKOWSKI 2B689547AD17461...

	Customer Name
Distribution :	BTF Testing Lab (Shenzhen) Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	5/28/2025	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 2450 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID2450
Serial Number	0722-DIP2G450-662
Product Condition (new / used)	Used

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only, however, being built in accordance to relevant standards, it can be used in others SAR test benches as long as the final user take care that the prescribed S11 and SAR target value are met.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

4.1 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's 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. A direct method is used with a ISO17025 calibrated caliper.

4.2 S11 PARAMETER REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a S11 of -20 dB or better. The S11 measurement shall be performed against a liquid filled flat phantom and using a prescribed spacer, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

4.3 SAR REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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.

5 MEASUREMENT UNCERTAINTY

5.1 MECHANICAL DIMENSIONS

For the measurement in the range 0-300mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.20 mm with respect to measurement conditions.

For the measurement in the range 300-450mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.44 mm with respect to measurement conditions.

5.2 S11 PARAMETER

The estimated expanded uncertainty (k=2) in calibration for the S11 parameter in linear is +/-0.08 with respect to measurement conditions.

5.3 SAR

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.

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The estimated expanded uncertainty (k=2) in calibration for the 1g and 10g SAR measurement in W/kg is +/-19% with respect to measurement conditions.

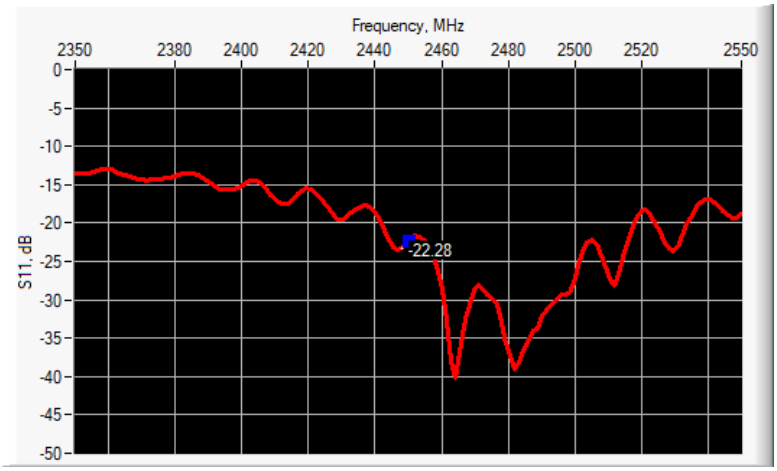
6 CALIBRATION RESULTS

6.1 MECHANICAL DIMENSIONS

L mm		h mm		d mm	
Measured	**Required**	**Measured**	**Required**	**Measured**	**Required**
-	51.50 +/- 2%	-	30.40 +/- 2%	-	3.60 +/- 2%

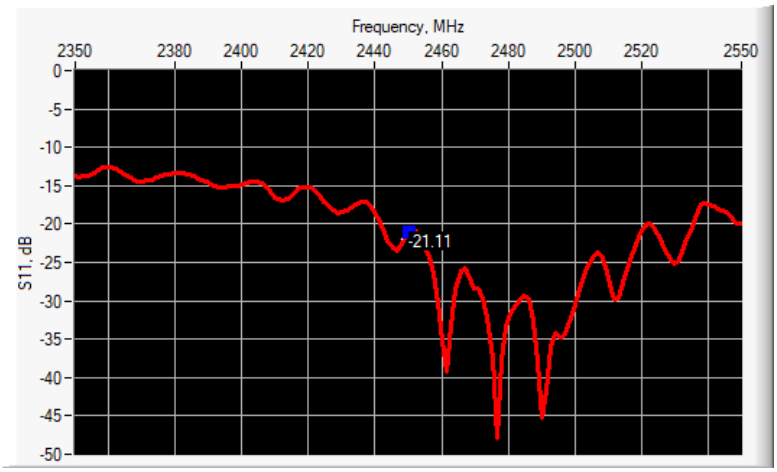
6.2 S11 PARAMETER

6.2.1 S11 parameter in Head Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
2450	-22.28	-20	49.2Ω + 7.4jΩ

6.2.2 S11 parameter in Body Liquid



Frequency (MHz)	S11 parameter (dB)	Requirement (dB)	Impedance
2450	-21.11	-20	52.5Ω + 8.4jΩ

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6.3 SAR

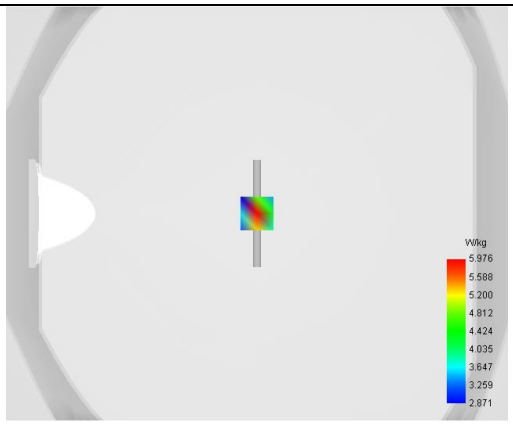
The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, 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 by using a prescribed spacer.

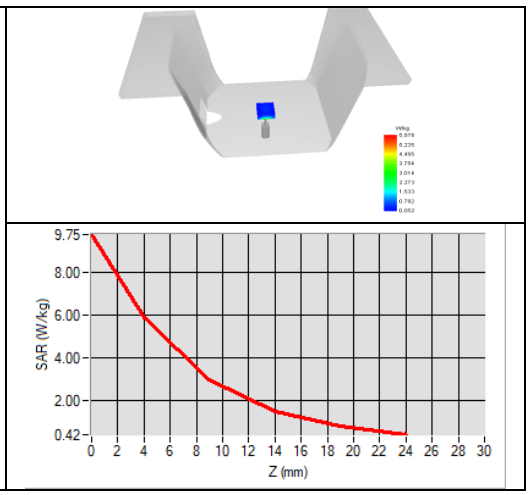
6.3.1 SAR with Head Liquid

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 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 V5
Phantom	SN 13/09 SAM68
Probe	4424-EPGO-443
Liquid	Head Liquid Values: eps' : 41.6 sigma : 1.88
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=5mm/dy=5mm/dz=5mm
Frequency	2450 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
2450 MHz	5.27	52.72	52.40	2.45	24.55	24.00





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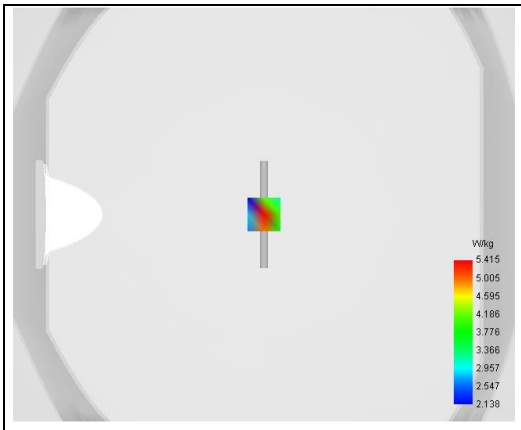
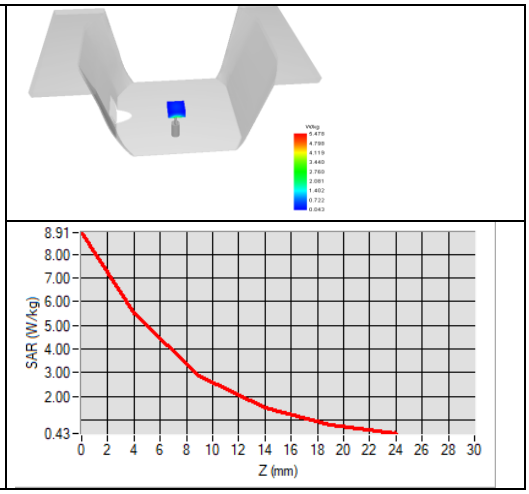
6.3.2 SAR with Body Liquid

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 4424-EPGO-443
Liquid	Body Liquid Values: eps' : 53.4 sigma : 2.08
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=5mm/dy=5mm/dz=5mm
Frequency	2450
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency	**1g SAR (W/kg)**			**10g SAR (W/kg)**		
	Measured	**Measured normalized to 1W**	**Target normalized to 1W**	**Measured**	**Measured normalized to 1W**	**Target normalized to 1W**
2450 MHz	5.02	50.15	51.20	2.31	23.11	23.70





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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2026
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2027
Calipers	Mitutoyo	SN 0009732	11/2022	11/2025
Reference Probe	MVG	4424-EPGO-443	05/2025	05/2026
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	183277	05/2022	05/2026
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2026
Power Meter	Keysight U2000A	SN: MY62340002	10/2024	10/2027
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44235403	10/2024	10/2027

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