FCC SAR EVALUATION REPORT

In accordance with the requirements of
FCC 47 CFR Part 2(2.1093), ANSI/IEEE C95.1-1992 and
IEEE Std 1528-2013

Product Name： Era Color

Trademark： PocketBook

Model Name： PB700K3

Family Model： N/A

Report No.： S24022207205001

FCC ID： 2AUVWPB700K3

Prepared for

Pocketbook International SA.

Crocicchio Cortogna 6, 6900, Lugano, Switzerland

Prepared by

Shenzhen NTEK Testing Technology Co., Ltd.
1/F, Building E, Fenda Science Park Sanwei, Xixiang, Bao'an District, Shenzhen, Guangdong, China
Tel. 400-800-6106, 0755-2320 0050, 0755-2320 0090
Website: http://www.ntek.org.cn

TEST RESULT CERTIFICATION

Applicant's name ..... Pocketbook International SA.

Address ..... Crocicchio Cortogna 6, 6900, Lugano, Switzerland

Manufacturer's Name ..... Pocketbook International SA.

Address ..... Crocicchio Cortogna 6, 6900, Lugano, Switzerland

Product description

Product name ..... Era Color

Trademark ..... PocketBook

Model Name PB700K3

Family Model ..... N/A

Standards .....
FCC 47 CFR Part 2(2.1093)
ANSI/IEEE C95.1-1992
IEEE Std 1528-2013
Published RF exposure KDB procedures

This device described above has been tested by Shenzhen NTEK. 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) and ANSI/IEEE C95.1-1992. 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.

This report shall not be reproduced except in full, without the written approval of Shenzhen NTEK, this document may be altered or revised by Shenzhen NTEK, personal only, and shall be noted in the revision of the document.

Test Sample Number S240222072005

Date of Test

Date (s) of performance of tests ... Mar. 09, 2024 ~ Mar. 11, 2024

Date of Issue ..... Mar. 12, 2024

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

Prepared By :	Reviewed By :	Approved By :
Jack Li	Aaron Cheng	Alex Li
Jack Li (Project Engineer)	Aaron Cheng (Supervisor)	Alex Li (Manager)

※ ※ Revision History ※ ※

REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	Mar. 12, 2024	Jack Li

TABLE OF CONTENTS

1. General Information 6
   1.1. RF exposure limits 6
   1.2. Statement of Compliance 7
   1.3. EUT Description 7
   1.4. Test specification(s) 8
   1.5. Ambient Condition 8
2. SAR Measurement System 9
   2.1. SATIMO SAR Measurement Set-up Diagram 9
   2.2. Robot 10
   2.3. E-Field Probe 11
      2.3.1. E-Field Probe Calibration 11
   2.4. SAM phantoms 12
      2.4.1. Technical Data 13
   2.5. Device Holder 14
   2.6. Test Equipment List 15
3. SAR Measurement Procedures 17
   3.1. Power Reference 17
   3.2. Area scan & Zoom scan 17
   3.3. Description of interpolation/extrapolation scheme 19
   3.4. Volumetric Scan 19
   3.5. Power Drift 19
4. System Verification Procedure 20
   4.1. Tissue Verification 20
      4.1.1. Tissue Dielectric Parameter Check Results 21
   4.2. System Verification Procedure 22
      4.2.1. System Verification Results 23
5. SAR Measurement variability and uncertainty 24
   5.1. SAR measurement variability 24
   5.2. SAR measurement uncertainty 24
6. RF Exposure Positions 25
   6.1. Tablet PC host platform exposure conditions 25
7. RF Output Power 26
   7.1. WLAN & Bluetooth Output Power 26
      7.1.1. Output Power Results Of WLAN 26
      7.1.2. Output Power Results Of Bluetooth 28
8. Antenna Location 29
9. Stand-alone SAR test exclusion 32
10. SAR Results 32
   10.1. SAR measurement results 32

10.1.1. SAR measurement Result of WLAN 2.4G 32
10.1.2. SAR measurement Result of WLAN 5.2G 32
10.1.3. SAR measurement Result of WLAN 5.8G 33
10.2. Simultaneous Transmission Analysis.....33
11. Appendix A. Photo documentation 33
12. Appendix B. System Check Plots.....33
13. Appendix C. Plots of High SAR Measurement.....41
14. Appendix D. Calibration Certificate 48

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 for PB700K3 are as follows.

Band	Max Reported SAR Value(W/kg)
	1-g Body (Separation distance of 0mm)
WLAN 2.4G	0.379
WLAN 5.2G	0.322
WLAN 5.8G	0.341

Note: This device is in 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 ANSI/IEEE C95.1-1992, 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	Era Color		
Trade Name	PocketBook		
Model Name	PB700K3		
Family Model	N/A		
FCC ID	2AUVWPB700K3		
Device Phase	Identical Prototype		
Exposure Category	General population / Uncontrolled environment		
Antenna Type	FPC Antenna		
Battery Information	DC 3.8V, 2500mAh		
Hardware version	v. 1.0		
Firmware version	U700k3.6.8.xxx		
Device Operating Configurations			
Supporting Mode(s)	WLAN 2.4G/5G, Bluetooth		
Test Modulation	WLAN(DSSS/OFDM), Bluetooth(GFSK, π/4-DQPSK, 8DPSK)		
Device Class	B		
Operating Frequency Range(s)	Band	Tx (MHz)	Rx (MHz)
	WLAN 2.4G	2412-2462	
	WLAN 5.2G	5180-5240	
	WLAN 5.8G	5745-5825	
	Bluetooth	2402-2480	

1.4. Test specification(s)

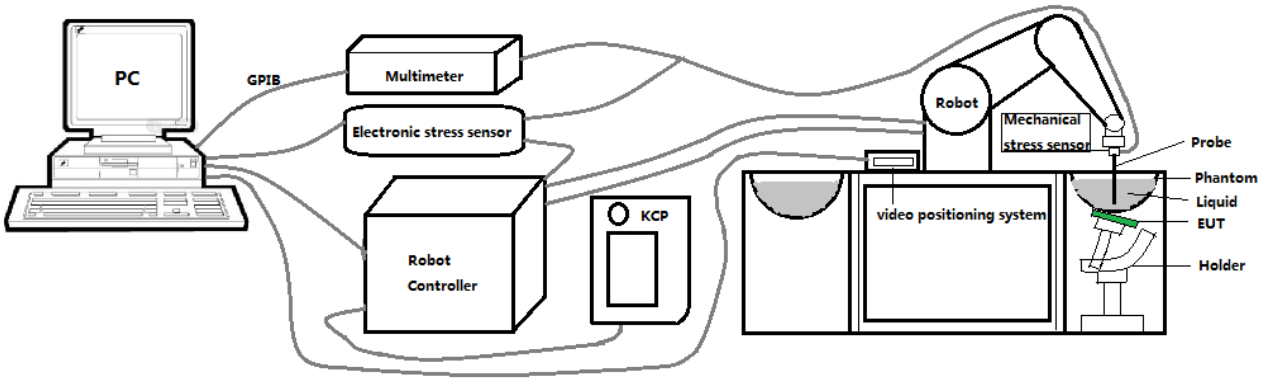
FCC 47 CFR Part 2(2.1093)
ANSI/IEEE C95.1-1992
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz
KDB 865664 D02 RF Exposure Reporting
KDB 447498 D01 General RF Exposure Guidance
KDB 248227 D01 802.11 Wi-Fi SAR
KDB 616217 D04 SAR for laptop and tablets

1.5. Ambient Condition

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

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. E-Field 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 3423-EPGO-426 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 2.5 mm
- Distance between probe tip and sensor center: 1 mm
- Distance between sensor center and the inner phantom surface: 2 mm (repeatability better than ±1 mm).
- Probe linearity: ±0.06 dB
- Axial isotropy: ±0.01 dB
- Hemispherical Isotropy: ±0.01 dB
- Calibration range: 650MHz to 5900MHz for head & body simulating liquid.
- Lower detection limit: 8mW/kg

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 ±10%. The spherical isotropy shall be evaluated and within ±0.25dB. 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.

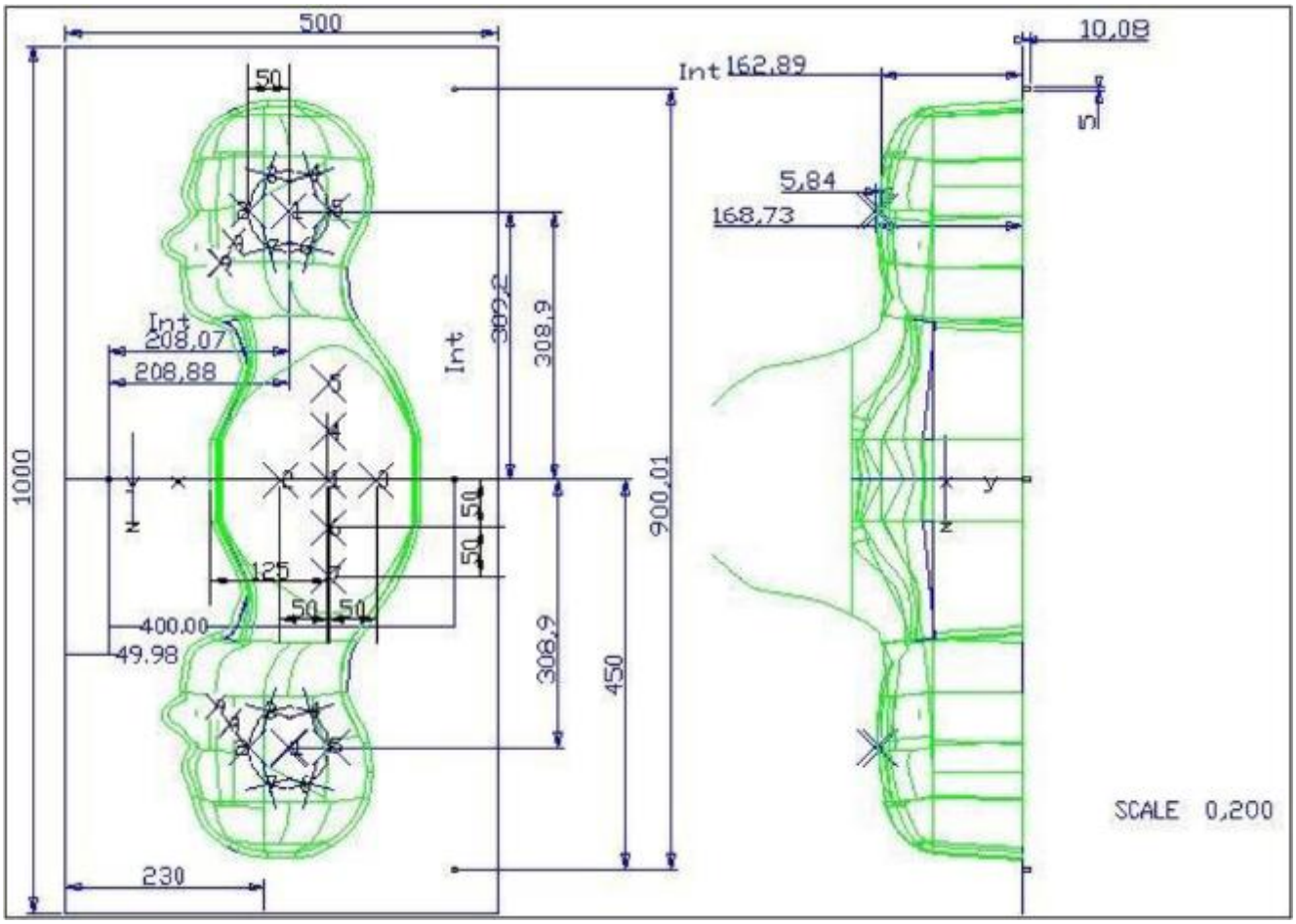
2.4. SAM phantoms

Photo of SAM phantom SN 16/15 SAM119

The SAM phantom is used to measure the SAR relative to people exposed to electro-magnetic field radiated by mobile phones.

2.4.1. Technical Data

Serial Number	Shell thickness	Filling volume	Dimensions	Positionner Material	Permittivity	Loss Tangent
SN 16/15 SAM119	2 mm ±0.2 mm	27 liters	Length:1000 mm Width:500 mm Height:200 mm	Gelcoat with fiberglass	3.4	0.02

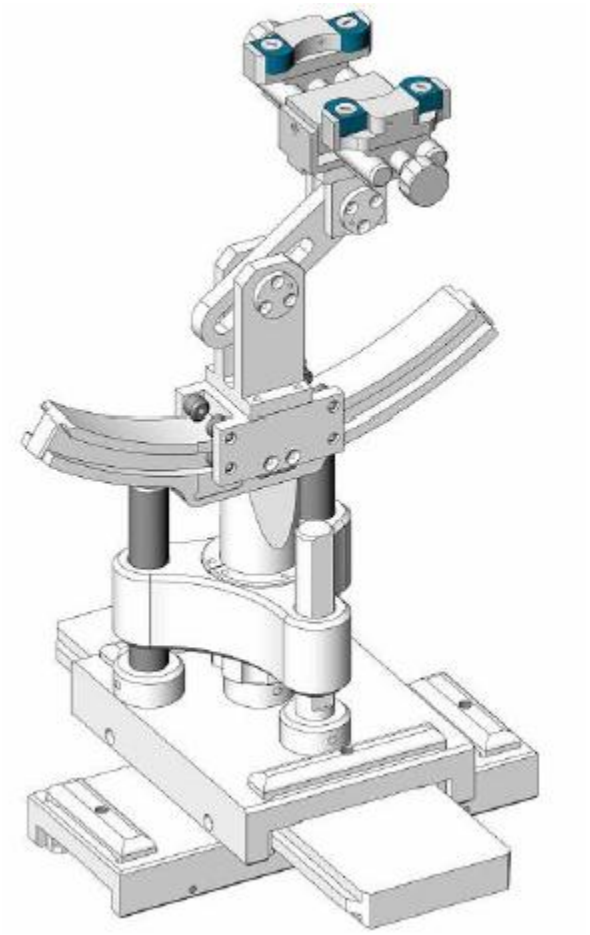


Serial Number	Left Head(mm)		Right Head(mm)		Flat Part(mm)	
SN 16/15 SAM119	2	2.02	2	2.08	1	2.09
	3	2.05	3	2.06	2	2.06
	4	2.07	4	2.07	3	2.08
	5	2.08	5	2.08	4	2.10
	6	2.05	6	2.07	5	2.10
	7	2.05	7	2.05	6	2.07
	8	2.07	8	2.06	7	2.07
	9	2.08	9	2.06	-	-

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

2.5. Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1 degree.



Serial Number	Holder Material	Permittivity	Loss Tangent
SN 16/15 MSH100	Delrin	3.7	0.005

2.6. 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	3423-EPGO-426	Sep. 18, 2023	Sep. 17, 2024
☐	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 DIP 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	NCR	NCR
☒	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
☒	KEITHLEY	Millivoltmeter	2000	4072790	NCR	NCR
☐	R&S	Universal radio communication tester	CMU200	117858	May 29, 2023	May 28, 2024
☐	R&S	Wideband radio communication tester	CMW500	103917	May 29, 2023	May 28, 2024
☒	HP	Network	8753D	3410J01136	May 29,	May 28,

		Analyzer			2023	2024
☒	Agilent	MXG Vector Signal Generator	N5182A	MY47070317	May 29, 2023	May 28, 2024
☒	Agilent	Power meter	E4419B	MY45102538	May 29, 2023	May 28, 2024
☒	Agilent	Power sensor	E9301A	MY41495644	May 29, 2023	May 28, 2024
☒	Agilent	Power sensor	E9301A	US39212148	May 29, 2023	May 28, 2024
☒	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Jul. 04, 2023	Jul. 03, 2024
☒	N/A	Thermometer	N/A	LES-085	Mar. 27, 2023	Mar. 26, 2026
☒	MVG	SAM Phantom	SSM2	SN 16/15 SAM119	NCR	NCR
☒	MVG	Device Holder	SMPPD	SN 16/15 MSH100	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 2450	Head 2450	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 5200	Head 5200	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 5800	Head 5800	NCR	NCR

3. SAR Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.

(b) Read the WWAN RF power level from the base station simulator.

(c) For WLAN/Bluetooth power measurement, use engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power in each supported wireless interface and frequency band.

(d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/Bluetooth output power.

<SAR measurement>

(a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power, in the highest power channel.

(b) Place the EUT in the positions as Appendix A demonstrates.

(c) Set scan area, grid size and other setting on the OPENSAR software.

(d) Measure SAR results for the highest power channel on each testing position.

(e) Find out the largest SAR result on these testing positions of each band.

(f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

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.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

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 ±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									
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	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	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	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	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23
Ingredients (% of weight)	Body Tissue									
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	50.30	50.30	50.30	69.91	69.91	71.88	71.88	71.88	79.54	79.54
NaCl	0.60	0.60	0.60	0.13	0.13	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	49.10	49.10	49.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	9.99	9.99	19.97	19.97	19.97	11.24	11.24
DGBE	0.00	0.00	0.00	19.97	19.97	7.99	7.99	7.99	9.22	9.22

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.

Photo of Liquid depth for Head Position	Photo of Liquid depth for Body Position

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 of the dielectric parameter are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within ±5% of the target values.

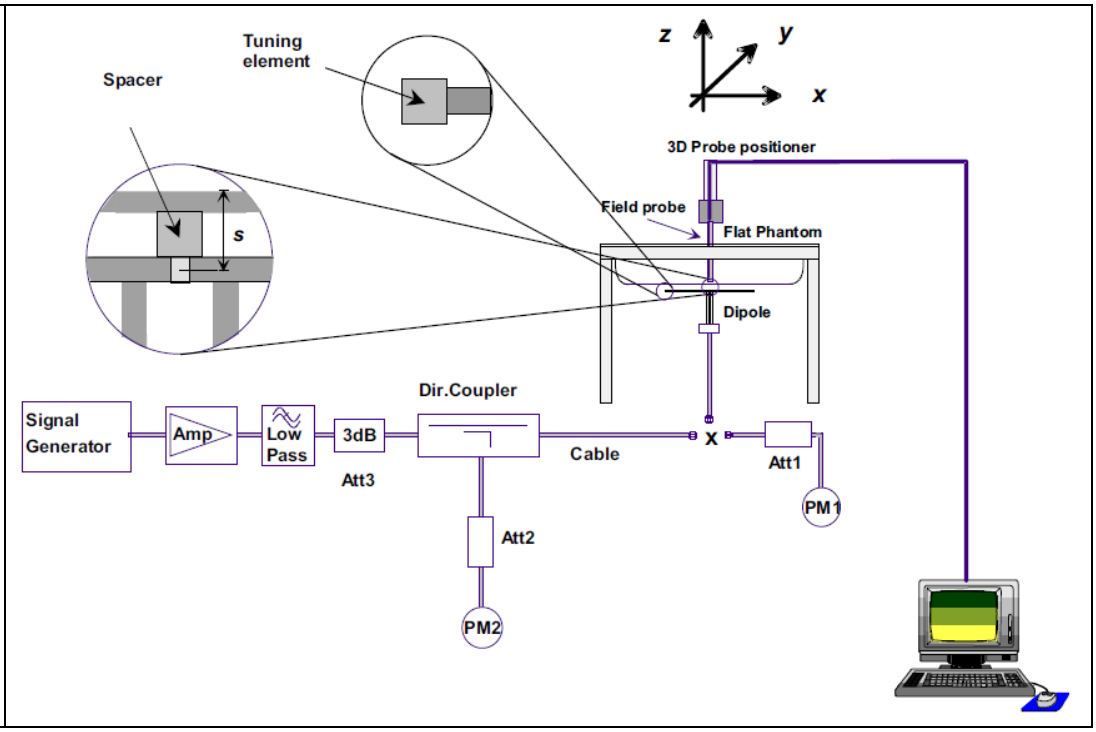
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue		Liquid Temp.	Test Date
		εr (±5%)	σ (S/m) (±5%)	εr	σ (S/m)		
Head 2450	2450	39.20 (37.24~41.16)	1.80 (1.71~1.89)	37.72	1.76	21.8 °C	Mar. 09, 2024
Head 5200	5200	36.00 (34.20~37.80)	4.66 (4.43~4.89)	34.77	4.54	21.7 °C	Mar. 10, 2024
Head 5800	5800	35.30 (33.54~37.07)	5.27 (5.01~5.53)	34.20	5.24	21.7 °C	Mar. 11, 2024

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 ±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	Target SAR (1W) (±10%)		Measured SAR (Normalized to 1W)		Liquid Temp.	Test Date
	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)		
2450MHz	50.05 (45.05~55.06)	23.80 (21.42~26.18)	48.77	22.28	21.8 °C	Mar. 09, 2024
5200MHz	162.59 (146.33~178.85)	56.21 (50.59~61.83)	147.42	53.76	21.7 °C	Mar. 10, 2024
5800MHz	182.20 (163.98~200.42)	61.32 (55.19~67.45)	167.51	63.15	21.7 °C	Mar. 11, 2024

5. SAR Measurement variability and uncertainty

5.1. 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.

5.2. SAR measurement uncertainty

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

6. RF Exposure Positions

6.1. Tablet PC host platform exposure conditions

Refer to KDB616217 D04, when the modular approach is used, transmitters and modules must be initially tested for standalone operations in generic host conditions according to the following minimum test separation distance and antenna installation requirements for incorporation in the tablet platform. The separation distance required for incorporation in qualified hosts is described in KDB 447498; item 5) of section 4.1 and item 1) of section 5.2.2 etc.

- ≤ 5 mm between the antenna and user for both back surface and edge exposure conditions
- the antennas used by the host must have been tested for equipment approval or qualify for SAR test exclusion
- the antenna polarization, physical orientation, rotation and installation configurations used by the host must have been tested for compliance or qualify for test exclusion
- when the *SAR Test Exclusion Threshold* in KDB 447498 applies, a *test separation distance* of 5 mm is required to determine test exclusion for the tablet platform

The antennas embedded in tablets are typically ≤ 5mm from the outer housing. The required antenna to user test separation distance is a “not to exceed test” distance required to apply the modular approach. Instead of the typical zero gap tablet edge test requirement between the edge of a tablet and the user, when an antenna has been tested at ≤ 5 mm according to the modular approach it can be incorporated into tablets with at least twice the tested distance from the outer housing of the tablet edge; otherwise, the tablet edge zero gap test requirement applies. When the dedicated host approach is applied, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom.

7. RF Output Power

7.1. WLAN & Bluetooth Output Power

7.1.1. Output Power Results Of WLAN

Mode	Channel	Frequency (MHz)	Tune-up	Output Power (dBm)
802.11b	1	2412	16.00	15.50
	6	2437	16.00	15.74
	11	2462	16.00	15.84
802.11g	1	2412	14.00	13.17
	6	2437	14.00	13.51
	11	2462	14.00	13.39
802.11n HT20	1	2412	12.50	12.01
	6	2437	12.50	12.34
	11	2462	12.50	11.30
802.11n HT40	3	2422	12.00	11.65
	6	2437	12.00	11.94
	9	2452	12.00	11.60
ax20	1	2412	12.50	11.66
	6	2437	12.50	12.17
	11	2462	12.50	11.26
ax40	3	2422	12.50	11.67
	6	2437	12.50	12.05
	9	2452	12.50	11.70

NOTE: Power measurement results of WLAN 2.4G.

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)
802.11a	36	5180	12.50	11.13
	40	5200	12.50	11.40
	48	5240	12.50	12.38
802.11n HT20	36	5180	12.50	11.11
	40	5200	12.50	11.50
	48	5240	12.50	12.21
802.11n HT40	38	5190	12.50	11.45
	46	5230	12.50	12.04
802.11ac VHT20	36	5180	12.50	11.11
	40	5200	12.50	11.48
	48	5240	12.50	12.09

802.11ac VHT40	38	5190	12.00	11.19
	46	5230	12.00	11.94
802.11ac VHT80	42	5210	11.00	10.57
ax20	36	5180	10.50	10.19
	40	5200	10.00	9.99
	48	5240	10.00	9.86
ax40	38	5190	10.00	9.97
	46	5230	10.50	10.07
ax80	42	5210	10.00	9.89

NOTE: Power measurement results of WLAN 5.2G.

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)
802.11a	149	5745	11.50	11.37
	157	5785	11.50	10.87
	165	5825	11.50	10.30
802.11n HT20	149	5745	11.50	11.33
	157	5785	11.50	10.75
	165	5825	11.50	10.07
802.11n HT40	151	5755	11.50	11.34
	159	5795	11.50	10.65
802.11ac VHT20	149	5745	11.50	11.37
	157	5785	11.50	10.82
	165	5825	11.50	10.23
802.11ac VHT40	151	5755	11.50	11.34
	159	5795	11.50	10.69
802.11ac VHT80	155	5775	11.50	11.19
ax20	149	5745	12.00	11.53
	157	5785	11.50	11.18
	165	5825	10.50	10.22
ax40	151	5755	11.50	11.45
	159	5795	11.00	10.76
ax80	155	5775	11.00	10.02

NOTE: Power measurement results of WLAN 5.8G.

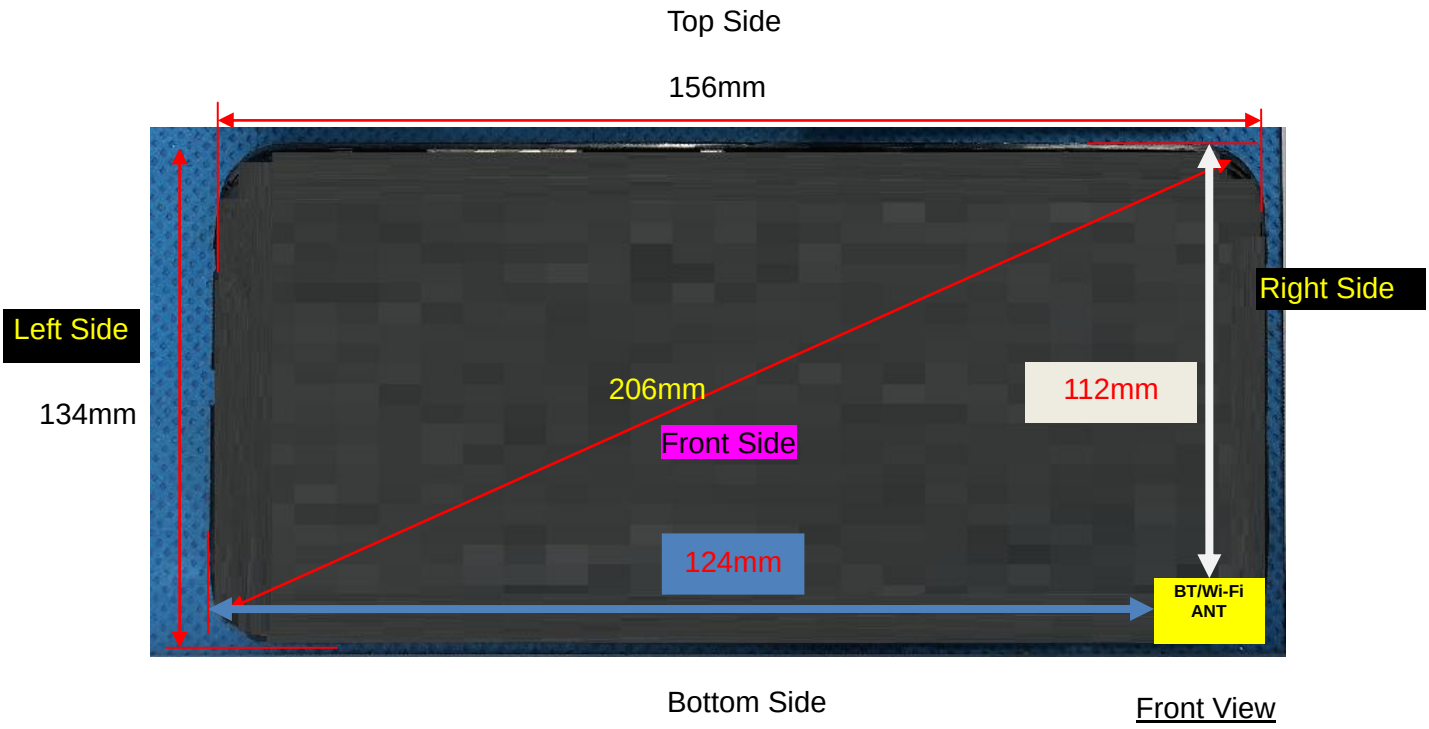
7.1.2. Output Power Results Of Bluetooth

	Output Power (dBm)				
	Data Rates	Tune-up	Channel		
			0CH	39CH	78CH
BR+EDR	1M	6.00	5.11	5.12	5.15
	2M	8.00	7.71	7.64	7.54
	3M	8.00	7.59	7.71	7.62

	Channel	Tune-up	Output Power (dBm)	
			1M	2M
BLE	0CH	5.00	4.79	4.67
	19CH	5.00	4.79	4.67
	39CH	5.00	4.74	4.60

NOTE: Power measurement results of Bluetooth.

8. Antenna Location



Note: Since the confidentiality request of EUT，the antenna location example diagram see as above.

Distance of the Antenna to the EUT surface/edge						
Antennas	Front Side	Back Side	Left Side	Right Side	Top Side	Bottom Side
WLAN & Bluetooth	5	5	124	5	112	5

Note: When the minimum separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Positions for SAR tests		
Test separation distances ≤ 50 mm		
Exposure Positions	Tune-up Maximum power of WLAN 2.4G	
	16.00 dBm	39.81 mW
Front Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	12.49
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	12.49
	SAR testing required?	YES
Right Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	12.49
	SAR testing required?	YES
Bottom Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	12.49

	SAR testing required?	YES
Exposure Positions	Tune-up Maximum power of WLAN 5.2G	
	12.50 dBm	17.78 mW
Front Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	8.14
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	8.14
	SAR testing required?	YES
Right Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	8.14
	SAR testing required?	YES
Bottom Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	8.14
	SAR testing required?	YES
Exposure Positions	Tune-up Maximum power of WLAN 5.8G	
	11.50 dBm	14.13 mW
Front Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	6.82
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	6.82
	SAR testing required?	YES
Right Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	6.82
	SAR testing required?	YES
Bottom Side	Antenna to user(mm)	5
	SAR exclusion threshold(mW)	6.82
	SAR testing required?	YES

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

Positions for SAR tests		
Test separation distances > 50 mm		
Exposure Positions	Tune-up Maximum power of WLAN 2.4G	
	16.00 dBm	39.81 mW
Left Side	Antenna to user(mm)	124
	SAR exclusion threshold(mW)	836
	SAR testing required?	NO
Top Side	Antenna to user(mm)	112
	SAR exclusion threshold(mW)	716

	SAR testing required?	NO
Exposure Positions	Tune-up Maximum power of WLAN 5.2G	
	12.50 dBm	17.78 mW
Left Side	Antenna to user(mm)	124
	SAR exclusion threshold(mW)	806
	SAR testing required?	NO
Top Side	Antenna to user(mm)	112
	SAR exclusion threshold(mW)	686
	SAR testing required?	NO
Exposure Positions	Tune-up Maximum power of WLAN 5.8G	
	11.50 dBm	14.13 mW
Left Side	Antenna to user(mm)	124
	SAR exclusion threshold(mW)	802
	SAR testing required?	NO
Top Side	Antenna to user(mm)	112
	SAR exclusion threshold(mW)	682
	SAR testing required?	NO

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

9. Stand-alone SAR test exclusion

Refer to FCC KDB 447498D01, the 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[$\sqrt{f_{(GHZ)}}$] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where:

- $f_{(GHZ)}$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Mode	P_{max} (dBm)	P_{max} (mW)	Distance (mm)	f (GHz)	Calculation Result	SAR Exclusion threshold	SAR test exclusion
Bluetooth	8.00	6.31	5	2.480	2	3	Yes

NOTE: Standalone SAR test exclusion for Bluetooth

10. SAR Results

10.1. SAR measurement results

10.1.1. SAR measurement Result of WLAN 2.4G

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date	Plot
			1-g	10-g						
Front Side	11/2462	802.11b	0.240	0.094	-0.07	15.84	16.00	0.249	2024/3/09	
Back Side	11/2462	802.11b	0.365	0.150	3.68	15.84	16.00	0.379	2024/3/09	3#
Right Side	11/2462	802.11b	0.114	0.046	-1.34	15.84	16.00	0.118	2024/3/09	
Bottom Side	11/2462	802.11b	0.123	0.051	-3.95	15.84	16.00	0.128	2024/3/09	

NOTE: Body SAR test results of WLAN 2.4G

10.1.2. SAR measurement Result of WLAN 5.2G

Test Position of Body	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g	Date	Plot
			1-g	10-g						

with 0mm								(W/Kg)		
Front Side	48/5240	802.11a	0.198	0.080	2.50	12.38	12.50	0.204	2024/3/10	
Back Side	48/5240	802.11a	0.313	0.126	2.88	12.38	12.50	0.322	2024/3/10	1#
Right Side	48/5240	802.11a	0.099	0.040	0.49	12.38	12.50	0.102	2024/3/10	
Bottom Side	48/5240	802.11a	0.096	0.038	2.20	12.38	12.50	0.099	2024/3/10	

NOTE: Body SAR test results of WLAN 5.2G

10.1.3. SAR measurement Result of WLAN 5.8G

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date	Plot
			1-g	10-g						
Front Side	149/5745	ax20	0.210	0.087	-2.90	11.53	12.00	0.234	2024/3/11	
Back Side	149/5745	ax20	0.306	0.128	0.84	11.53	12.00	0.341	2024/3/11	2#
Right Side	149/5745	ax20	0.105	0.043	-2.68	11.53	12.00	0.117	2024/3/11	
Bottom Side	149/5745	ax20	0.102	0.042	-1.71	11.53	12.00	0.114	2024/3/11	

NOTE: Body SAR test results of WLAN 5.8G

10.2. Simultaneous Transmission Analysis

NO simultaneous transmissions are possible for this device of Bluetooth, 2.4G/5G Wi-Fi.

11. Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR

12. Appendix B. System Check Plots

Table of contents
MEASUREMENT 1 System Performance Check - 2450MHz

MEASUREMENT 2 System Performance Check - 5200MHz
MEASUREMENT 3 System Performance Check - 5800MHz

MEASUREMENT 1

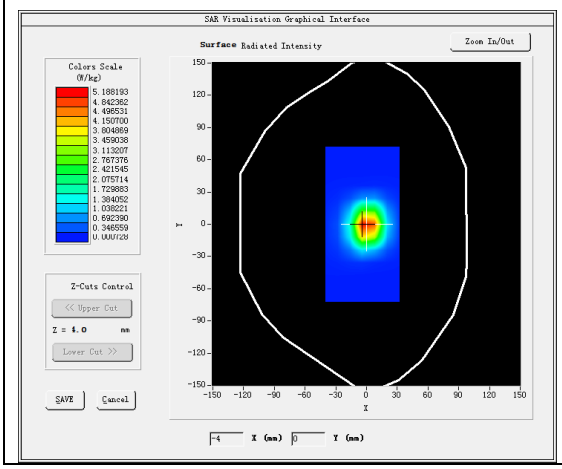
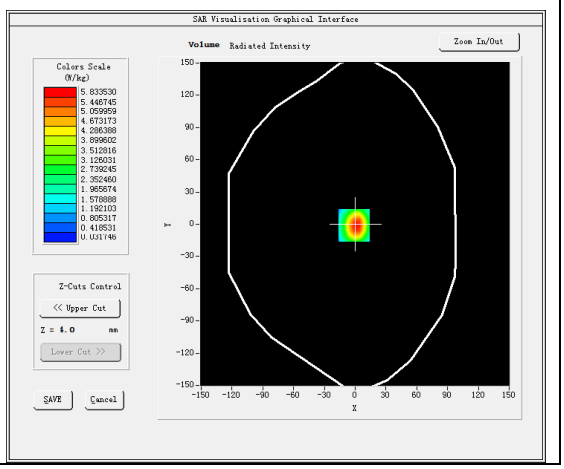
Date of measurement: 9/3/2024

A. Experimental conditions.

Area Scan	dx=12mm dy=12mm, h= 5.00 mm
ZoomScan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW2450
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.85

B. SAR Measurement Results

Frequency (MHz)	2450.000000
Relative permittivity (real part)	37.722156
Relative permittivity (imaginary part)	12.903236
Conductivity (S/m)	1.756274
Variation (%)	-3.640000

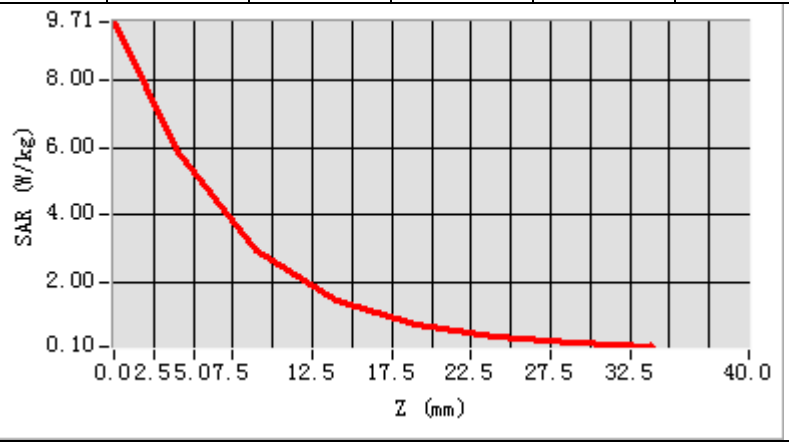
SURFACE SAR	**VOLUME SAR**
	

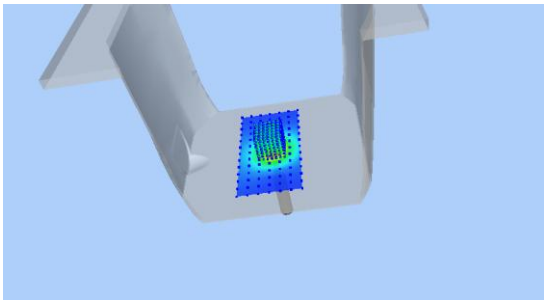
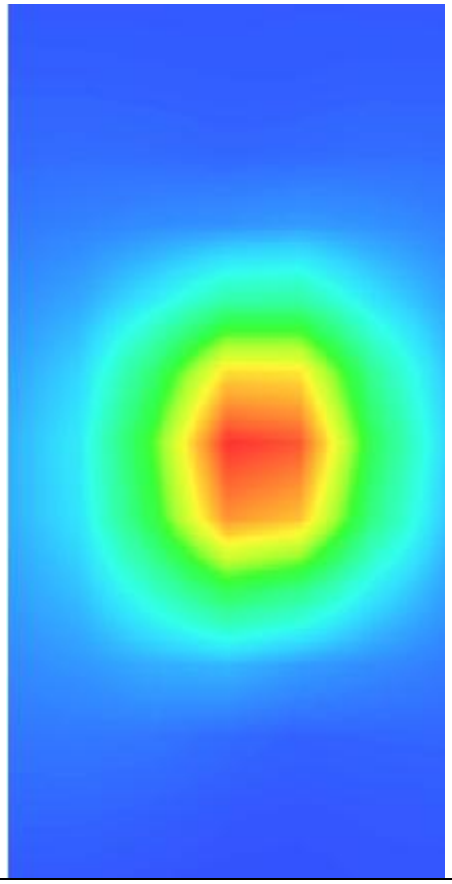
Maximum location: X=-1.00, Y=-1.00

SAR Peak: 9.83 W/kg

SAR 10g (W/Kg)	2.228231
SAR 1g (W/Kg)	4.877129

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	9.7142	5.8385	2.9279	1.4635	0.7406	0.3749	0.1919



3D screen shot	Hot spot position
	

MEASUREMENT 2

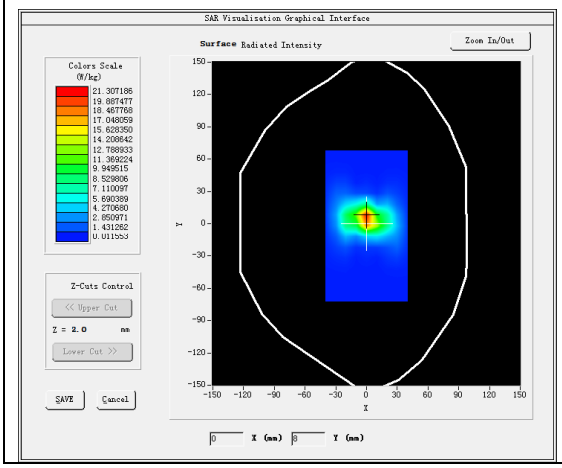
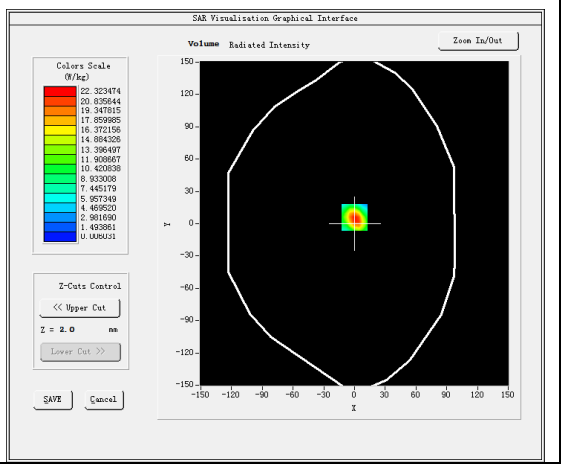
Date of measurement: 10/3/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Dipole
Band	CW5200
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.07

B. SAR Measurement Results

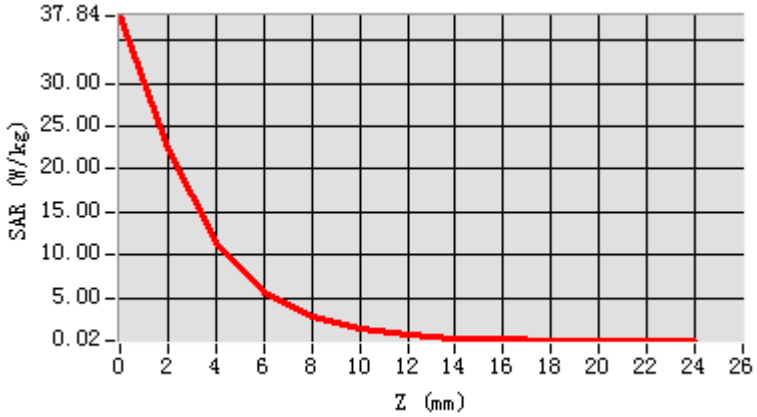
Frequency (MHz)	5200.000000
Relative permittivity (real part)	34.773427
Relative permittivity (imaginary part)	15.725970
Conductivity (S/m)	4.543058
Variation (%)	-2.960000

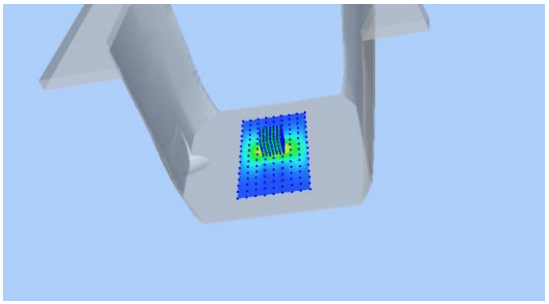
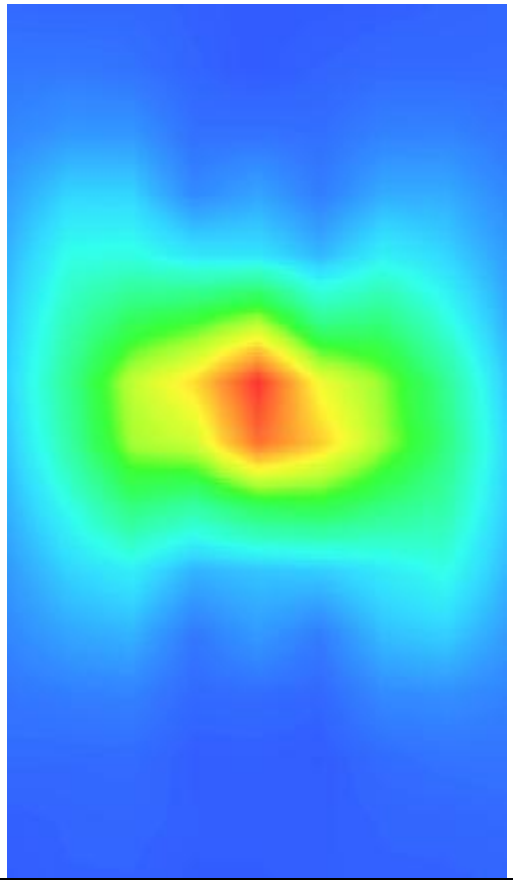
SURFACE SAR	**VOLUME SAR**
	

Maximum location: X=0.00, Y=6.00
SAR Peak: 40.06 W/kg

SAR 10g (W/Kg)	5.376168
SAR 1g (W/Kg)	14.742132

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	37.803	22.359	11.354	5.6688	2.8267	1.4093	0.7144	0.3661	0.1845	0.1085	0.0545	0.0326



3D screen shot	Hot spot position
	

MEASUREMENT 3

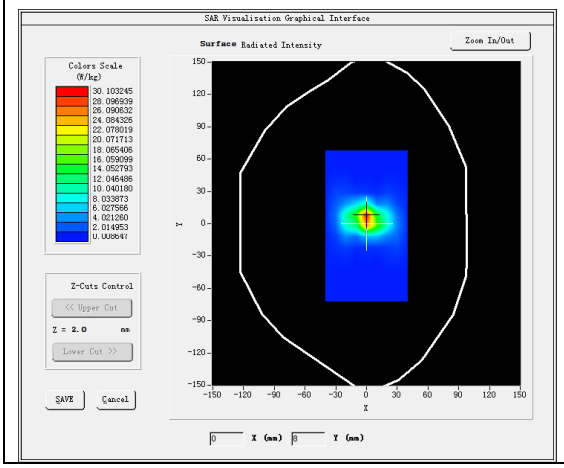
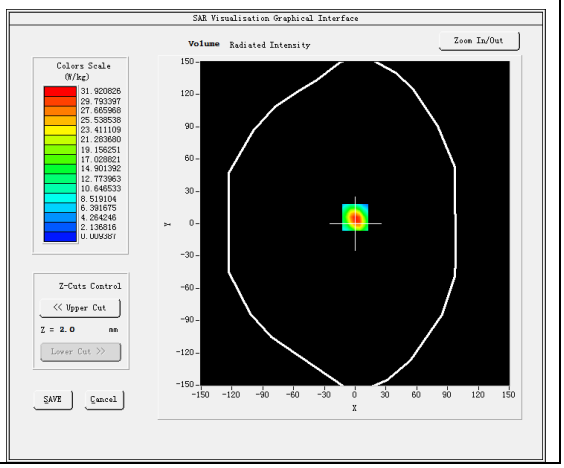
Date of measurement: 11/3/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Dipole
Band	CW5800
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.04

B. SAR Measurement Results

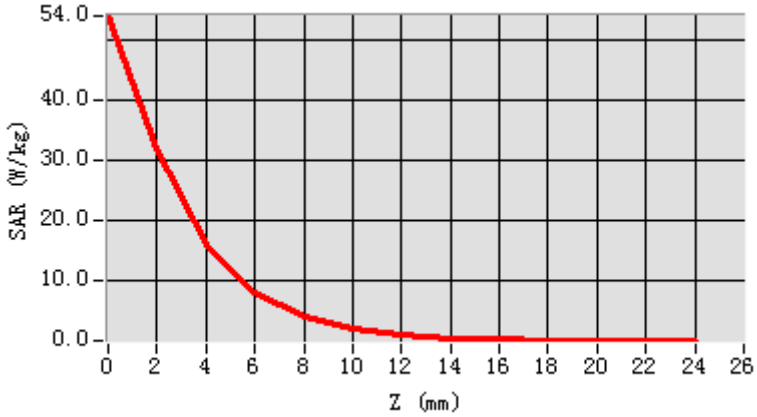
Frequency (MHz)	5800.000000
Relative permittivity (real part)	34.204577
Relative permittivity (imaginary part)	16.250199
Conductivity (S/m)	5.236175
Variation (%)	-2.800000

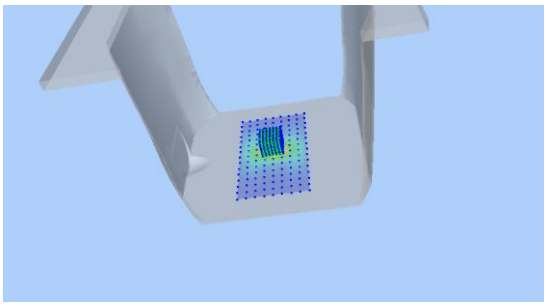
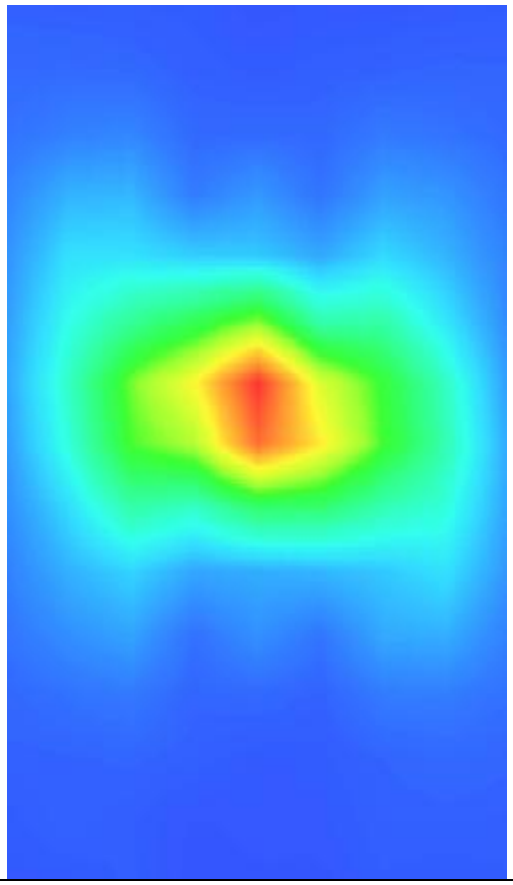
SURFACE SAR	**VOLUME SAR**
	

Maximum location: X=0.00, Y=6.00
SAR Peak: 57.37 W/kg

SAR 10g (W/Kg)	6.315255
SAR 1g (W/Kg)	16.751047

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	54.052	31.953	16.184	8.1716	4.0876	2.0571	1.0382	0.5190	0.2707	0.1534	0.0711	0.0410



3D screen shot	Hot spot position
	

13. Appendix C. Plots of High SAR Measurement

Table of contents
MEASUREMENT 1 WLAN 5.2G Body
MEASUREMENT 2 WLAN 5.8G Body
MEASUREMENT 3 WLAN 2.4G Body

MEASUREMENT 1

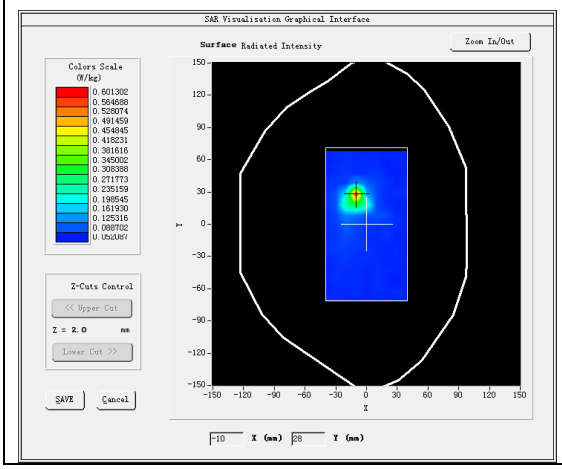
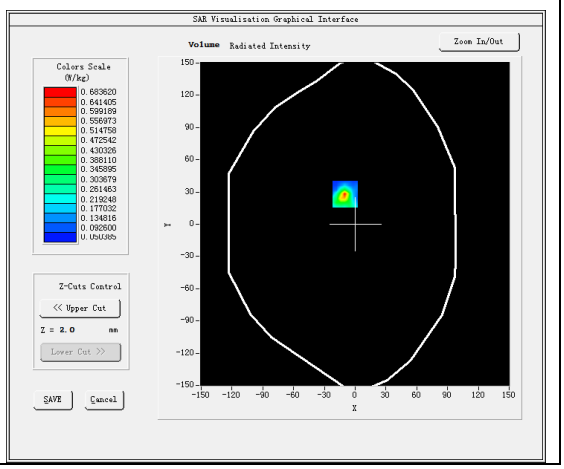
Date of measurement: 10/3/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11a U-NII
Channels	High
Signal	IEEE802.11a (Crest factor: 1.0)
ConvF	2.07

B. SAR Measurement Results

Frequency (MHz)	5240.000000
Relative permittivity (real part)	34.618903
Relative permittivity (imaginary part)	15.737355
Conductivity (S/m)	4.581319
Variation (%)	2.880000

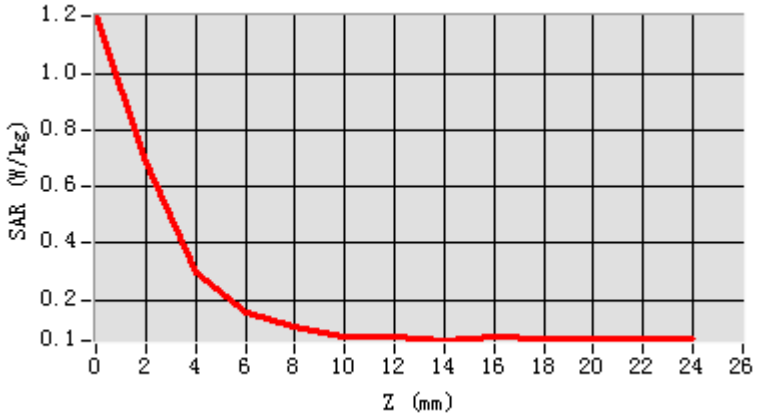
SURFACE SAR	VOLUME SAR
	

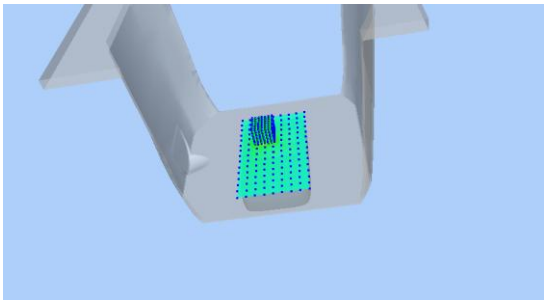
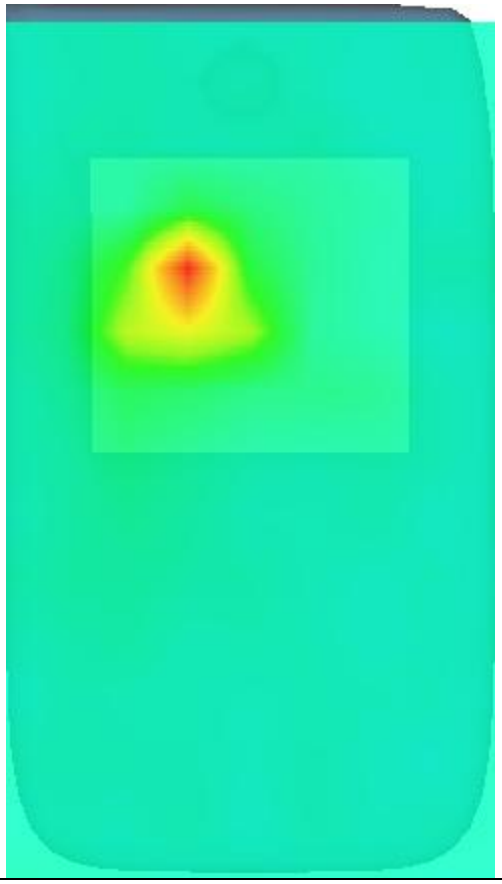
Maximum location: X=-10.00, Y=28.00

SAR Peak: 1.29 W/kg

SAR 10g (W/Kg)	0.125644
SAR 1g (W/Kg)	0.313181

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	1.2020	0.6836	0.2949	0.1556	0.1058	0.0742	0.0682	0.0566	0.0688	0.0607	0.0602	0.0654



3D screen shot	Hot spot position
	

MEASUREMENT 2

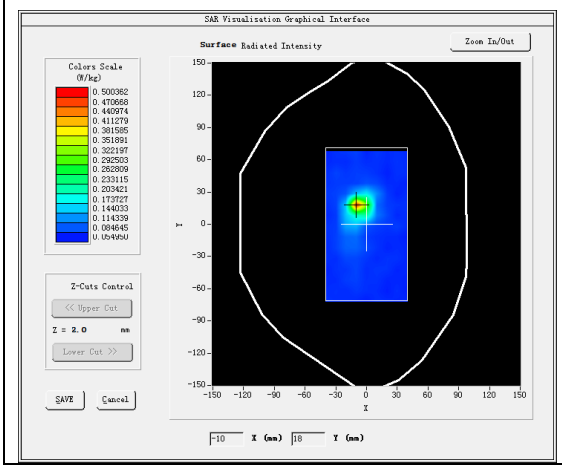
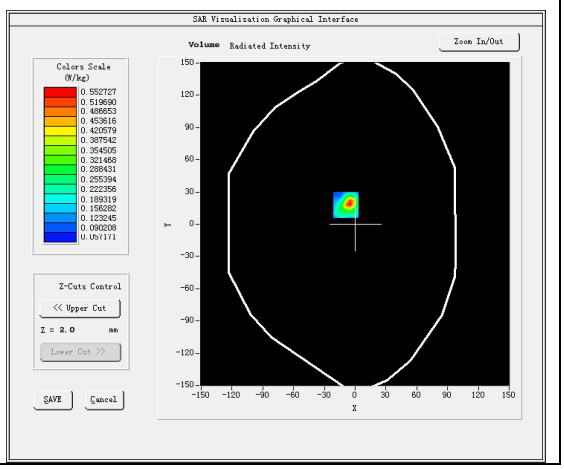
Date of measurement: 11/3/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11ax U-NII
Channels	Low
Signal	IEEE802.11ax (Crest factor: 1.0)
ConvF	2.04

B. SAR Measurement Results

Frequency (MHz)	5745.000000
Relative permittivity (real part)	34.334799
Relative permittivity (imaginary part)	16.289556
Conductivity (S/m)	5.199083
Variation (%)	0.840000

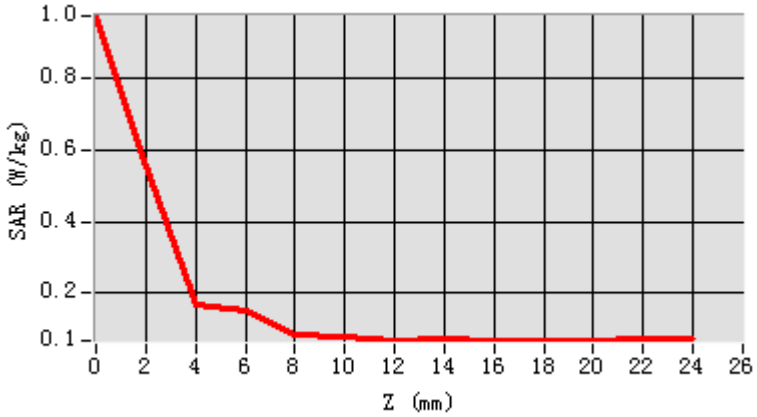
SURFACE SAR	VOLUME SAR
	

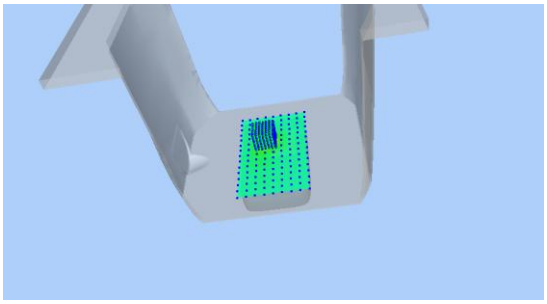
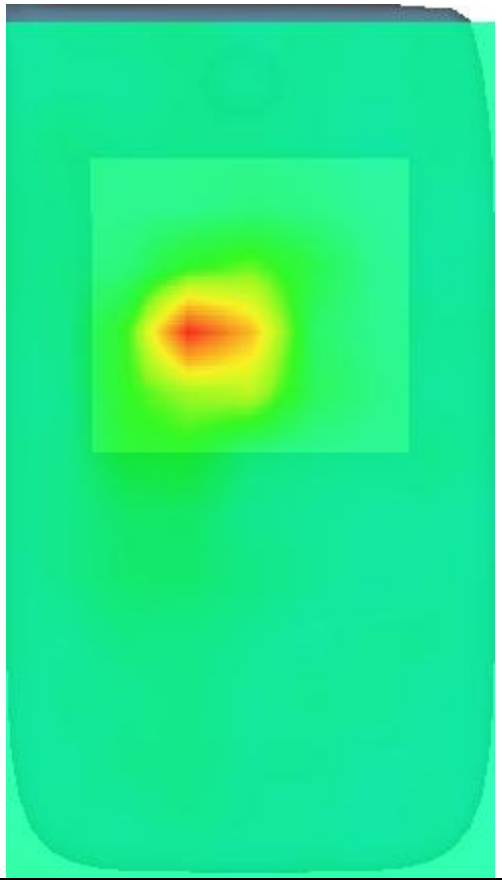
Maximum location: X=-9.00, Y=18.00

SAR Peak: 1.06 W/kg

SAR 10g (W/Kg)	0.128224
SAR 1g (W/Kg)	0.305906

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	0.9751	0.5527	0.1674	0.1526	0.0834	0.0770	0.0672	0.0711	0.0684	0.0693	0.0697	0.0708



3D screen shot	Hot spot position
	

MEASUREMENT 3

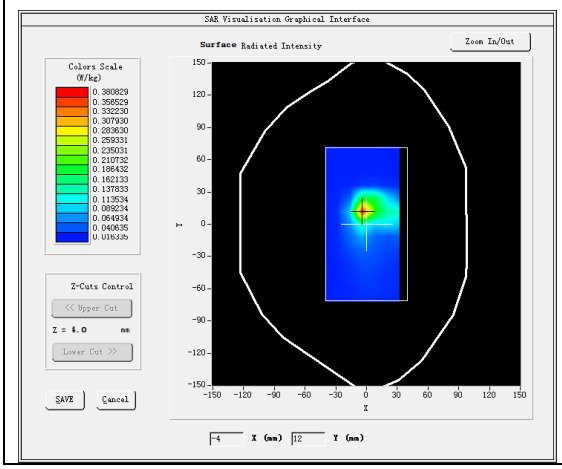
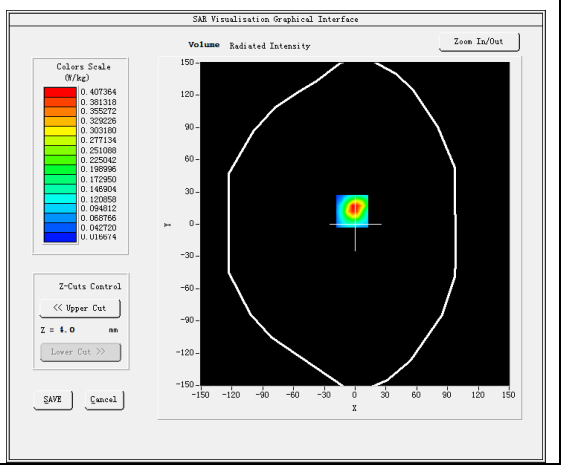
Date of measurement: 9/3/2024

A. Experimental conditions.

Area Scan	dx=12mm dy=12mm, h= 5.00 mm
ZoomScan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11b ISM
Channels	High
Signal	IEEE802.11b (Crest factor: 1.0)
ConvF	2.85

B. SAR Measurement Results

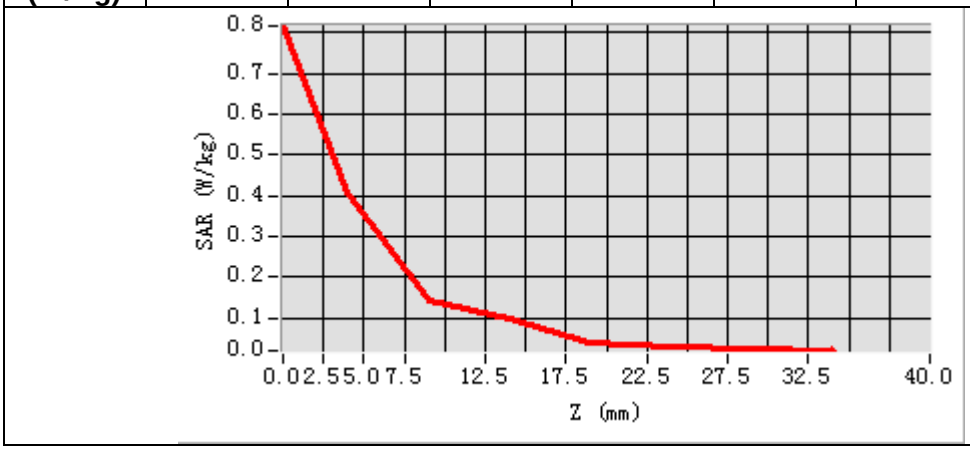
Frequency (MHz)	2462.000000
Relative permittivity (real part)	37.698156
Relative permittivity (imaginary part)	12.962536
Conductivity (S/m)	1.772987
Variation (%)	3.680000

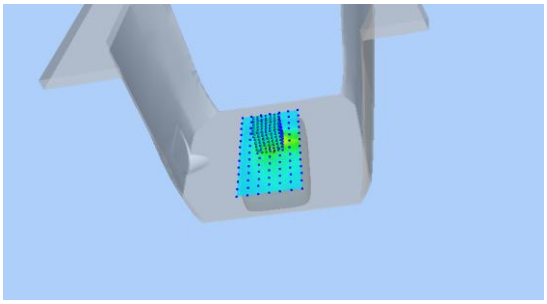
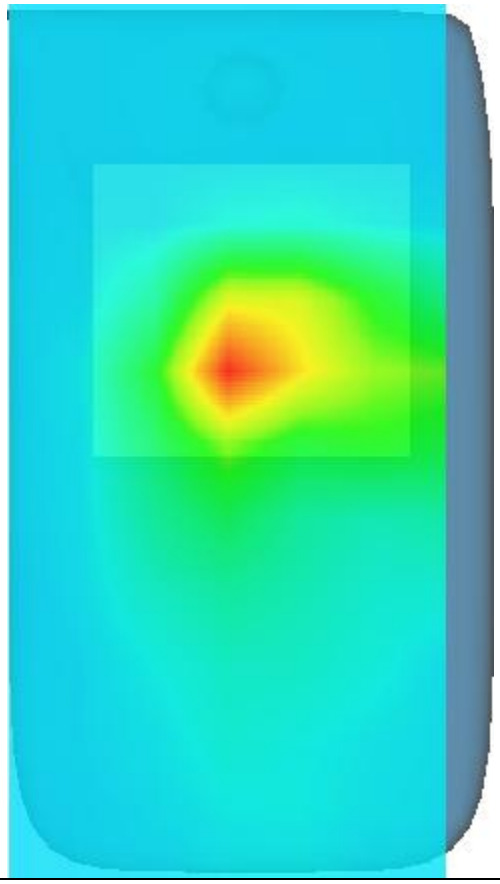
SURFACE SAR	**VOLUME SAR**
	

Maximum location: X=-3.00, Y=12.00
SAR Peak: 0.74 W/kg

SAR 10g (W/Kg)	0.150153
SAR 1g (W/Kg)	0.364991

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.8171	0.4074	0.1423	0.0963	0.0413	0.0298	0.0225



3D screen shot	Hot spot position
	

14. Appendix D. Calibration Certificate

Table of contents
E Field Probe - 3423-EPGO-426
2450 MHz Dipole - SN 03/15 DIP 2G450-352
5000-6000 MHz Dipole - SN 13/14 WGA 33
Extended Calibration Certificate

COMOSAR E-Field Probe Calibration Report

Ref : ACR.261.11.23.BES.A

SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET, BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA

MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: 3423-EPGO-426

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 09/18/2023

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

The use of the Cofrac brand and the accreditation references is prohibited from any reproduction.

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).

COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.261.11.23.BES.A

	Name	*Function*	*Date*	*Signature*
Prepared by :	Cyrille ONNEE	Measurement Responsible	9/18/2023	
Checked & approved by:	Jérôme Luc	Technical Manager	9/18/2023	
Authorized by:	Yann Toutain	Laboratory Director	9/19/2023	

Yann Toutain ID

Signature numérique de Yann Toutain ID
Date : 2023.09.19 09:08:14 +02'00'

	Customer Name
Distribution :	SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

Issue	*Name*	*Date*	*Modifications*
A	Cyrille ONNEE	9/18/2023	Initial release

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

TABLE OF CONTENTS

1 Device Under Test 4
2 Product Description 4
2.1 General Information 4
3 Measurement Method 4
3.1 Sensitivity 4
3.2 Linearity 5
3.3 Isotropy 5
3.4 Boundary Effect 5
4 Measurement Uncertainty 6
5 Calibration Results 6
5.1 Calibration in air 6
5.2 Calibration in liquid 7
6 Verification Results 8
7 List of Equipment 9

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	3423-EPGO-426
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.261 MΩ Dipole 2: R2=0.213 MΩ Dipole 3: R3=0.233 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.

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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.

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%).

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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.

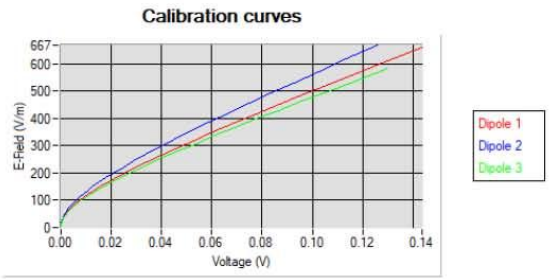
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

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.

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

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

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

Normx dipole 1 (μV/(V/m)^2)	Normy dipole 2 (μV/(V/m)^2)	Normz dipole 3 (μV/(V/m)^2)
0.78	0.62	0.85

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
105	108	107

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:

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

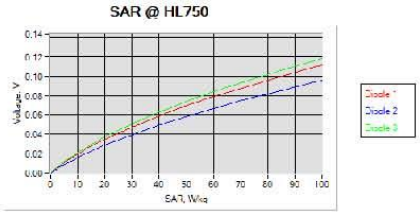
where
a=the larger cross-sectional of the waveguide
b=the smaller cross-sectional of the waveguide
δ=the skin depth for the liquid in the waveguide
Pw=the power delivered to the liquid

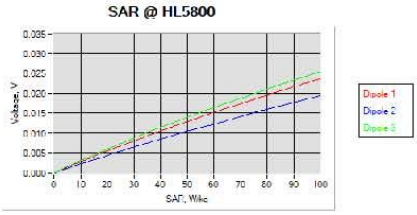
Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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
HL750	750	2.37
HL850	835	2.32
HL900	900	2.23
HL1800	1800	2.45
HL1900	1900	2.63
HL2000	2000	2.83
HL2300	2300	2.81
HL2450	2450	2.85
HL2600	2600	2.65
HL3300	3300	2.21
HL3500	3500	2.20
HL3700	3700	2.11
HL3900	3900	2.40
HL4200	4200	2.40
HL4600	4600	2.33
HL4900	4900	2.37
HL5200	5200	2.07
HL5400	5400	2.11
HL5600	5600	2.20
HL5800	5800	2.04

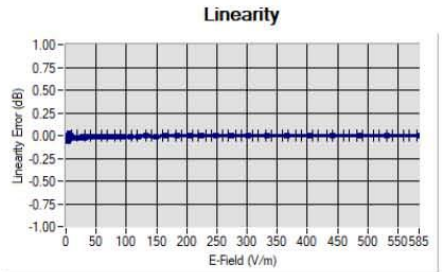
(*) Frequency validity is +/-50MHz below 600MHz, +/-100MHz from 600MHz to 6GHz and +/-700MHz above 6GHz



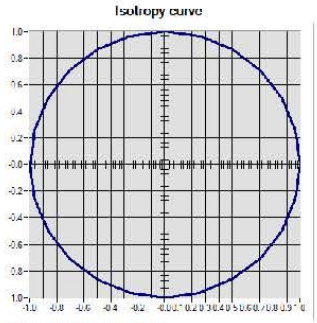


6 VERIFICATION RESULTS

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:+/-1.42% (+/-0.06dB)



Isotropy:+/-0.21% (+/-0.01dB)

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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 ZVM	100203	08/2021	08/2024
Network Analyzer	Agilent 8753ES	MY40003210	10/2019	10/2023
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2025
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
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	06/2024
Power Meter	Keysight U2000A	SN: MY62340002	10/2022	10/2025
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	09/2025
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.

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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.
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	44225320	06/2021	06/2024

Template_ACR.DDD.N.YY.MVGB.ISSUE_COMOSAR Probe vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

SAR Reference Dipole Calibration Report

Ref : ACR.53.29.24.BES.A

SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET,

BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA

MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 2450 MHZ

SERIAL NO.: SN 03/15DIP2G450-352

Calibrated at MVG

Z.I. de la pointe du diable

Technopôle Brest Iroise – 295 avenue Alexis de Rochon

29280 PLOUZANE - FRANCE

Calibration date: 02/21/2024

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

The use of the Cofrac brand and the accreditation references is prohibited from any reproduction.

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.

SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref : ACR.53.29.24.BES.A

	Name	*Function*	*Date*	*Signature*
Prepared by :	Pedro Ruiz	Measurement Responsible	2/22/2024	
Checked & approved by:	Jérôme Luc	Technical Manager	2/22/2024	
Authorized by:	Yann Toutain	Laboratory Director	2/27/2024	

Yann Toutain ID Signature numérique de Yann Toutain ID Date : 2024.02.27 08:57:39 +01'00'

	Customer Name
Distribution :	SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

Issue	*Name*	*Date*	*Modifications*
A	Pedro Ruiz	2/22/2024	Initial release

Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

TABLE OF CONTENTS

1 Introduction 4
2 Device Under Test 4
3 Product Description 4
3.1 General Information 4
4 Measurement Method 5
4.1 Mechanical Requirements 5
4.2 S11 parameter Requirements 5
4.3 SAR Requirements 5
5 Measurement Uncertainty 5
5.1 Mechanical dimensions 5
5.2 S11 Parameter 5
5.3 SAR 5
6 Calibration Results 6
6.1 Mechanical Dimensions 6
6.2 S11 parameter 6
6.3 SAR 6
7 List of Equipment 8

Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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	SN 03/15DIP2G450-352
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.

Figure 1 – *MVG COMOSAR Validation Dipole*

Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

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, 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.

Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.

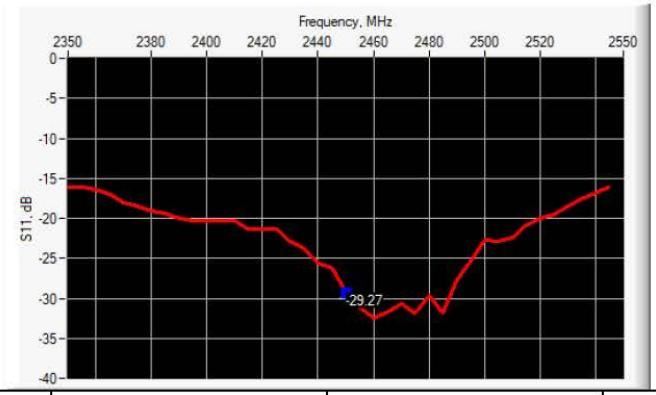
6 CALIBRATION RESULTS

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	-29.27	-20	53.6Ω + 0.1jΩ

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.

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.

Template_ACR.DDD.N.YY.MVGB.ISSUE_SAR Reference Dipole vL
This document shall not be reproduced, except in full or in part, without the written approval of MVG. The information contained herein is to be used only for the purpose for which it is submitted and is not to be released in whole or part without written approval of MVG.