

SAR TEST REPORT

Application No.: SUCR2604000317WM
Applicant: START USA, INC.
Address of Applicant: 5600 Tennyson Parkway, Suite 390, Plano, TX 75024, USA
Manufacturer: START USA, INC.
Address of Manufacturer: 5600 Tennyson Parkway, Suite 390, Plano, TX 75024, USA
EUT Description: 5G Feature phone
Model No.: SH3350
Trade Mark: START
FCC ID: 2AWF6-SH3350
Standards: FCC 47CFR §2.1093
Date of Receipt: 2026-04-07
Date of Test: 2026-06-12 to 2026-07-06
Date of Issue: 2026-07-09

Test Result :	PASS *
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* In the configuration tested, the EUT detailed in this report complied with the standards specified above.

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Revision Record			
Version	Description	Date	Remark
00	Original	2026-07-09	/

Authorized for issue by:		
Prepared By		Leon Liu
		Leon Liu/ Project Engineer
Approved By		Nick Hu
		Nick Hu/ Reviewer

TEST SUMMARY

Frequency Band	Maximum Reported SAR(W/kg)		
	Head	Body-worn	Product specific 10g SAR
WCDMA Band II	<0.10	1.12	1.43
WCDMA Band IV	<0.10	1.14	2.81
WCDMA Band V	<0.10	1.18	1.45
LTE Band 7	1.03	0.53	2.32
LTE Band 12(17)	<0.10	0.70	1.01
LTE Band 13	<0.10	0.95	1.14
LTE Band 14	0.11	0.95	1.05
LTE Band 25(2)	1.03	1.13	1.55
LTE Band 26(5)	<0.10	0.94	1.41
LTE Band 30	0.56	0.88	2.86
LTE Band 41(38)	<0.10	0.28	1.14
LTE Band 48	1.00	1.04	0.74
LTE Band 66(4)	0.35	1.12	2.49
LTE Band 71	<0.10	0.57	1.13
NR Band n5	0.11	1.03	1.50
NR Band n7	0.97	0.83	2.64
NR Band n14	0.12	1.18	1.21
NR Band n25(2)	0.95	1.07	1.31
NR Band n30	0.78	1.08	3.06
NR Band n41(38)	1.14	0.61	2.78
NR Band n48	1.04	1.03	0.97
NR Band n66	0.27	1.00	1.86
NR Band n71	<0.10	0.52	0.50
NR Band n77(78)	1.07	1.14	1.82
WI-FI (2.4GHz)	<0.10	<0.10	<0.10
WI-FI (5GHz)	0.84	0.33	1.40
BT	<0.10	<0.10	<0.10
SAR Limited(W/kg)	1.6		4.0
Maximum Simultaneous Transmission SAR (W/kg)			
Scenario	Head	Body-worn	Product specific 10g SAR
Sum SAR	1.58	1.59	3.92
SPLSR	/	/	/
SPLSR Limited	0.04		0.1

Note:

1) The Simultaneous transmission SAR is the same test position of the WWAN Antenna + WiFi/BT Antenna.
2) According to TCB Workshop October, 2014 RF Exposure Procedures Update (Overlapping Bands): SAR for LTE Band 2/4/5/17/38 and NR Band n2/n38/n78 is respectively covered by LTE Band 25/66/26/12/41 and NR Band n25/n41/n77 due to similar frequency range, same maximum tune up limit and same channel bandwidth. Because the frequency range is similar, the maximum tuning limit is the same, and the channel bandwidth and other operating parameters for the smaller band is fully supported by the larger band.

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1 General Information

1.1 General Description of EUT

Product Name:	5G Feature phone		
Model No.:	SH3350		
Trade Mark:	START		
Product Phase:	production unit		
Device Type:	portable device		
Exposure Category:	uncontrolled environment / general population		
IMEI:	355770280001859/355770280003491		
Hardware Version:	SH3350HV1.0		
Software Version:	SH3350SV1.0.0		
Antenna Type:	Internal Antenna		
Device Operating Configurations:			
Test Mode Configuration:	WCDMA :QPSK,16QAM LTE :QPSK,16QAM,64QAM,256QAM 5G NR :DFT-s-OFDM(PI/2 BPSK,QPSK,16QAM,64QAM,256QAM) CP-OFDM(QPSK,16QAM,64QAM,256QAM) WIFI :DSSS,OFDM; BT :GFSK, $\pi/4$ DQPSK,8DPSK		
HSDPA UE Category:	14	HSUPA UE Category:	6
DC-HSDPA UE Category:	14		
Power Class:	3, tested with power control “all 1”(WCDMA Band)		
	3, tested with power control “max power”(LTE Band)		
Frequency Bands:	Band	Tx(MHz)	
	WCDMA Band II	1850~1910	
	WCDMA Band IV	1710~1755	
	WCDMA Band V	824~849	
	LTE Band 2	1850 ~1910	
	LTE Band 4	1710~1755	
	LTE Band 5	824~849	
	LTE Band 7	2500~2570	
	LTE Band 12	699~716	
	LTE Band 13	777~787	
	LTE Band 14	788~798	
	LTE Band 17	704-716	
	LTE Band 25	1850-1915	
	LTE Band 26	814~849	
	LTE Band 30	2305~2315	
	LTE Band 38	2570~2620	
	LTE Band 41	2496~2690	

	LTE Band 48	3550-3700
	LTE Band 66	1710~1780
	LTE Band 71	663~698
	NR Band n2	1850 ~1910
	NR Band n5	824~849
	NR Band n7	2500~2570
	NR Band n14	788~798
	NR Band n25	1850-1915
	NR Band n30	2305~2315
	NR Band n38	2570~2620
	NR Band n41	2496~2690
	NR Band n48	3550-3700
	NR Band n66	1710~1780
	NR Band n71	663~698
	NR Band n77	3450~3550
		3700~3980
	NR Band n78	3450~3550
		3700~3800
	WIFI 2.4G	2412~2462
	WIFI 5G	5150~5250
		5250~5350
		5470~5725
		5725~5850
	BT	2402~2480
RF Cable:	☒ Provided by applicant ☐ Provided by the laboratory	
Battery Information:	Model:	SA3300
	Normal Voltage:	3.85V
	Rated capacity:	3000mAh
	Manufacturer:	Guangdong Fenghua New Energy Co., Ltd. Shenzhen Branch
Note: Since the above data and/or information is provided by the client relevant results or conclusions of this report are only made for these data and/or information, SGS is not responsible for the authenticity, integrity and results of the data and information and/or the validity of the conclusion.		

1.2 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 941225 D01	3G SAR Measurement Procedures v03r01
KDB 941225 D05	SAR for LTE Devices v02r05
KDB 941225 D05A	LTE Rel.10 KDB Inquiry Sheet v01r02
KDB 248227 D01	SAR Guidance for IEEE 802.11 Wi-Fi SAR v02r02
KDB 648474 D04	Handset SAR v01r03
KDB 447498 D01	General RF Exposure Guidance v06
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02
KDB 690783 D01	SAR Listings on Grants v01r03
KDB 616217 D04	SAR for laptop and tablets v01r02

1.3 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	1.60 mW/g	8.00 mW/g
Spatial Average SAR** (Whole Body)	0.08 mW/g	0.40 mW/g
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 mW/g	20.00 mW/g

Notes:

* The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time

** The Spatial Average value of the SAR averaged over the whole body.

*** The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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

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

1.4 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd.

South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu)
Pilot Free Trade Zone

No tests were sub-contracted.

1.5 Test Engineer

Test Engineer: Thomas Liang, Koller Chen

1.6 Test Facility

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

- **A2LA (Certificate No. 6336.01)**

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. is accredited by the American Association for Laboratory Accreditation (A2LA).

- **FCC (Designation Number: CN1312)**

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. has been recognized as an accredited testing laboratory.

Test Firm Registration Number: 717327

- **ISED (CAB Identifier: CN0120)**

SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd. has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory.

Company Number: 27594

2 Laboratory Environment

Temperature	Min. = 18°C, Max. = 25 °C
Relative humidity	Min. = 30%, Max. = 70%
Ground system resistance	< 0.5 Ω
Ambient noise is checked and found very low and in compliance with requirement of standards. Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

3 SAR Measurements System Configuration

3.1 The SAR Measurement System

This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation $SAR = \sigma (|E_i|^2) / \rho$ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

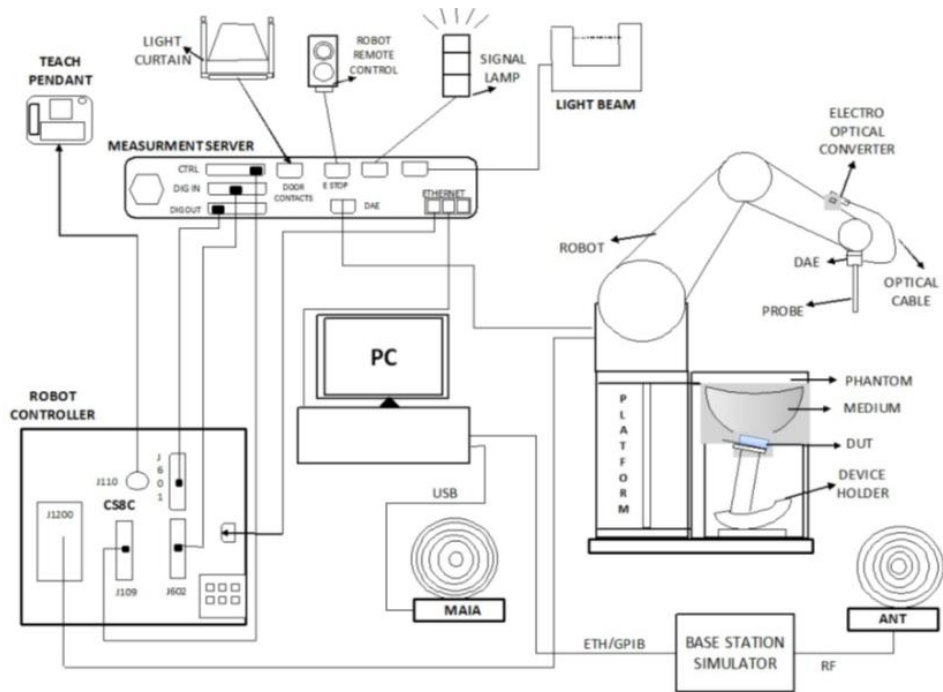
The DASY system for performing compliance tests consists of the following items:

A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software. An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.



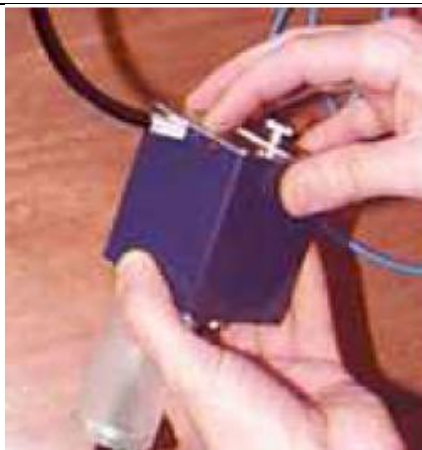
F-1. SAR Measurement System Configuration

- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows system.
- DASY software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

3.2 Isotropic E-field Probe EX3DV4

	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	4 MHz - 10 GHz Linearity: ± 0.2 dB (30 MHz - 10 GHz)
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μ W/g - 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (Tip: 9 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 10 GHz with precision of better 30%.
Compatibility	DASY52 SAR and higher, EASY4/MRI

3.3 Data Acquisition Electronics (DAE)

Model	DAE	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)	
Input Offset Voltage	< 5μV (with auto zero)	
Input Bias Current	< 50 f A	
Dimensions	60 x 60 x 68 mm	

3.4 SAM Twin Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	
Wooden Support	SPEAG standard phantom table	

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

3.5 ELI Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2.0 ± 0.2 mm(bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	
Wooden Support	SPEAG standard phantom table	

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 4 MHz to 10 GHz. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles. ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4 but has reinforced top structure.

3.6 Device Holder for Transmitters



F-2. Device Holder for Transmitters

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon=3$ and loss tangent $\delta=0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

3.7 Measurement Procedure

3.7.1 Scanning procedure

Step 1: Power reference measurement

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: Area scan

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Zoom scan

Around this point, a volume of 32mm*32mm*30mm ($f \leq 2\text{GHz}$), 30mm*30mm*30mm (f for 2-3GHz) and 24mm*24mm*22mm (f for 5-6GHz) was assessed by measuring 5x5x7 points ($f \leq 2\text{GHz}$), 7x7x7 points (f for 2-3GHz) and 7x7x12 points (f for 5-6GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification). The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

If the zoom scan measured as specified in the preceding paragraphs complies with both i) and ii), or if the psSAR is below 0,1 W/kg, no additional measurements are needed.

i) The smallest horizontal distance from the local SAR peaks to all points 3 dB below the SAR peak shall be larger than the horizontal grid steps in both x- and y-directions (Δx , Δy). This shall be checked for the measured zoom scan plane conformal to the phantom at the distance zM1. The minimum distance shall be recorded in the SAR test report.

ii) The ratio of the SAR at the second measured point (M2) to the SAR at the closest measured point (M1) at the x-y location of the measured maximum SAR value shall be at least 30 %. This ratio (in %) shall be recorded in the SAR test report.

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

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max $\pm 5 \%$.

3.7.2 Data storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension "DAE". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated. The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [m W/g], [m W/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

3.7.3 Data Evaluation by SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	- Sensitivity	Normi, ai0, ai1, ai2
- Conversion factor	ConvFi	
- Diode compression point	Dcpi	
Device parameters:	- Frequency	f
- Crest factor	cf	
Media parameters:	- Conductivity	ε
- Density	ρ	

These parameters must be set correctly in the software. They can be found in the component documents, or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

With V_i = compensated signal of channel i ($i = x, y, z$)

U_i = input signal of channel i ($i = x, y, z$)

cf = crest factor of exciting field (DASY parameter)

dcp i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:

$$E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$$

H-field probes:

$$H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1}f + a_{i2}f^2) / f$$

With V_i = compensated signal of channel i ($i = x, y, z$)

$Norm_i$ = sensor sensitivity of channel i ($i = x, y, z$)

[mV/(V/m)²] for E-field Probes

$ConvF$ = sensitivity enhancement in solution

a_{ij} = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

E_i = electric field strength of channel i in V/m

H_i = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = (E_x^2 + E_y^2 + E_z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$SAR = (E_{tot}^2 \cdot \sigma) / (\epsilon \cdot 1000)$$

with SAR = local specific absorption rate in mW/g

E_{tot} = total field strength in V/m

σ = conductivity in [mho/m] or [Siemens/m]

ϵ = equivalent tissue density in g/cm³

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}^2 / 3770 \text{ or } P_{pwe} = H_{tot}^2 \cdot 37.7$$

with P_{pwe} = equivalent power density of a plane wave in mW/cm²

E_{tot} = total electric field strength in V/m

H_{tot} = total magnetic field strength in A/m

4 SAR measurement variability and uncertainty

4.1 SAR measurement variability

Per KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, 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 ($\sim 10\%$ 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 .

The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

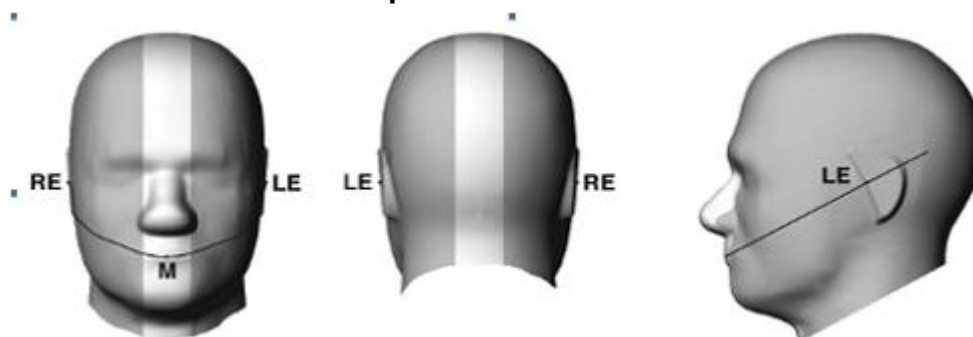
4.2 SAR measurement uncertainty

Per KDB 865664 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.

5 Description of Test Position

5.1 The Head Test Position

5.1.1 SAM Phantom Shape

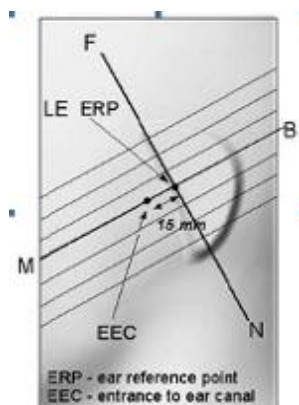


F-3. Front, back, and side views of SAM (model for the phantom shell). Full-head model is for illustration purposes only-procedures in this recommended practice are intended primarily for the phantom setup.

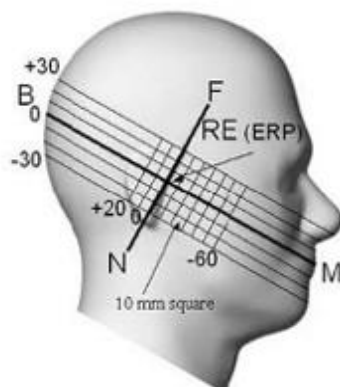
Note: The centre strip including the nose region has a different thickness tolerance.



F-4. Sagittally bisected phantom with extended perimeter (shown placed on its side as used for SAR measurements)

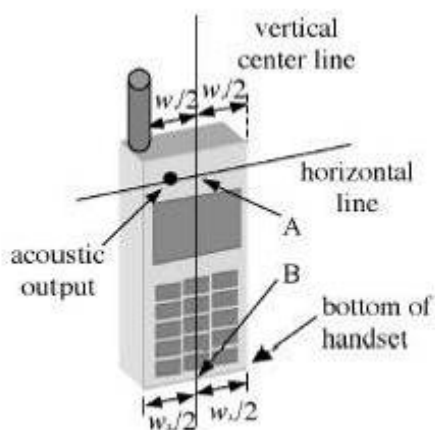


F-5. Close-up side view of phantom, showing the ear region, N-F and B-M lines, and seven cross-sectional plane locations

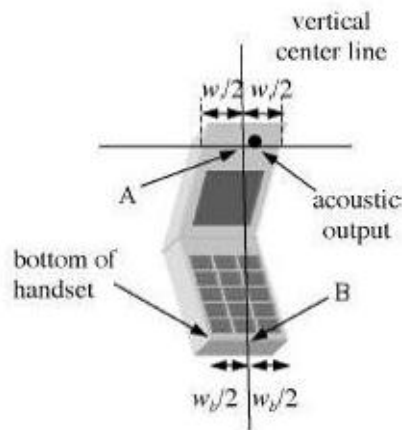


F-6.Side view of the phantom showing relevant markings and seven cross-sectional plane locations

5.1.2 EUT constructions



F-7. Handset vertical and horizontal reference lines-
“fixed case”



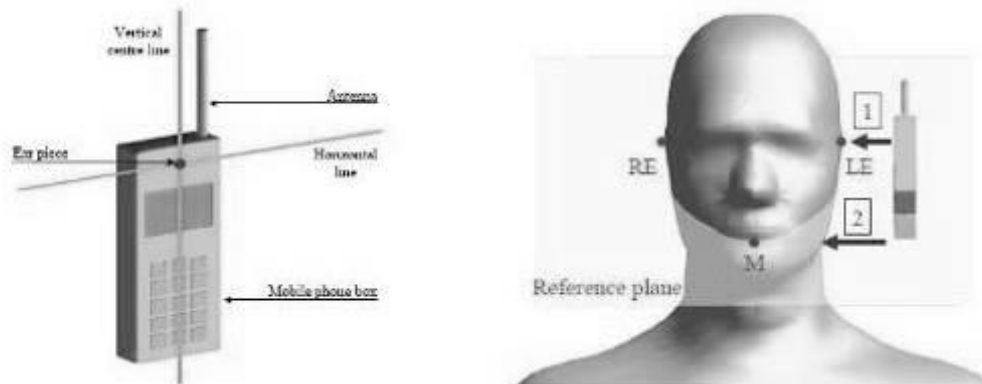
F-8.Handset vertical and horizontal reference lines-
“clam-shell case”

5.1.3 Definition of the “check” position

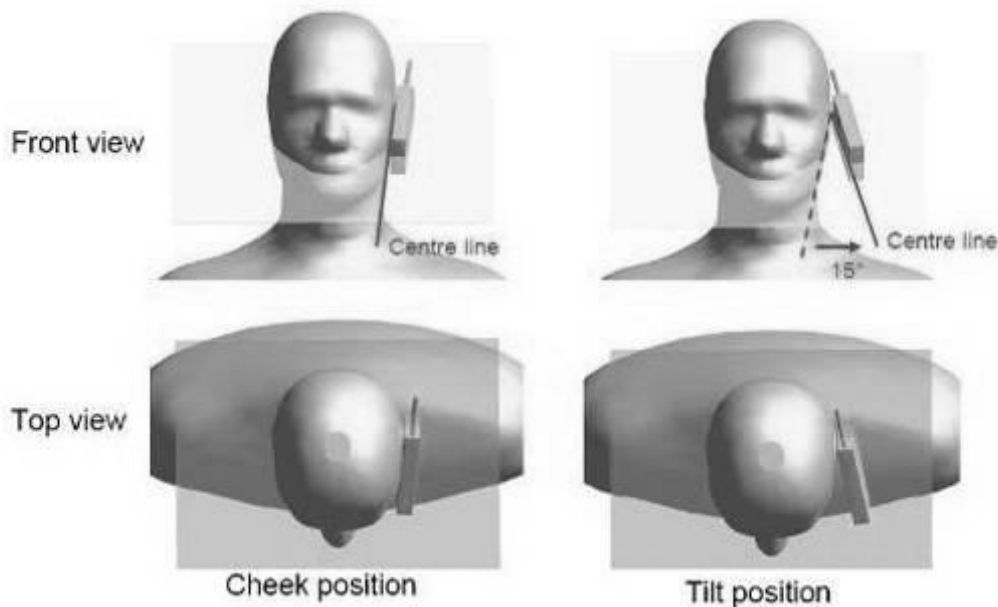
- Position the device with the vertical centre line of the body of the device and the horizontal line crossing the centre of the ear piece in a plane parallel to the sagittal plane of the phantom (“initial position”). While maintaining the device in this plane, align the vertical centre line with the reference plane containing the three ear and mouth reference points (M, RE and LE) and align the centre of the ear piece with the line RE-LE.
- Translate the mobile phone box towards the phantom with the ear piece aligned with the line LE-RE until telephone touches the ear. While maintaining the device in the reference plane and maintaining the phone contact with the ear, move the bottom of the box until any point on the front side is in contact with the cheek of the phantom or until contact with the ear is lost.

5.1.4 Definition of the “tilted” position

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



F-9. Definition of the reference lines and points, on the phone and on the phantom and initial position



F-10. “Cheek” and “tilt” positions of the mobile phone on the left side

5.2 The Body Test Position

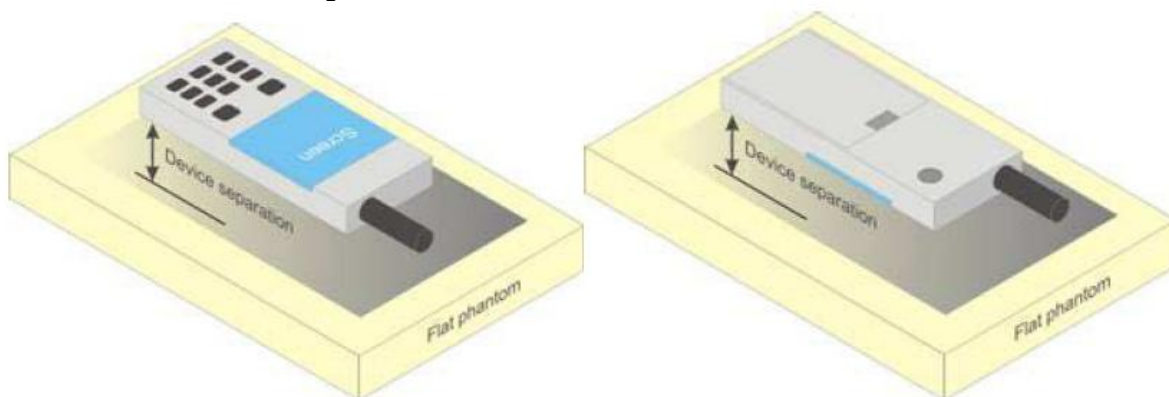
5.2.1 Body-worn exposure conditions

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations.

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration. Per FCC KDB Publication 648474 D04, Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in FCC KDB Publication 447498 D01 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for a body-worn accessory, measured without a headset connected to the handset, is $> 1.2 \text{ W/kg}$, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a headset attached to the handset.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used. Test position spacing was documented. Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.



F-11. Test positions for body-worn devices

5.3 Extremity exposure conditions

Per FCC KDB 648474 D04, for smart phones with a display diagonal dimension > 15.0 cm or an overall diagonal dimension > 16.0 cm that provide similar mobile web access and multimedia support found in mini-tablets or UMPC mini-tablets that support voice calls next to the ear, the device is marketed as “Phablet”.

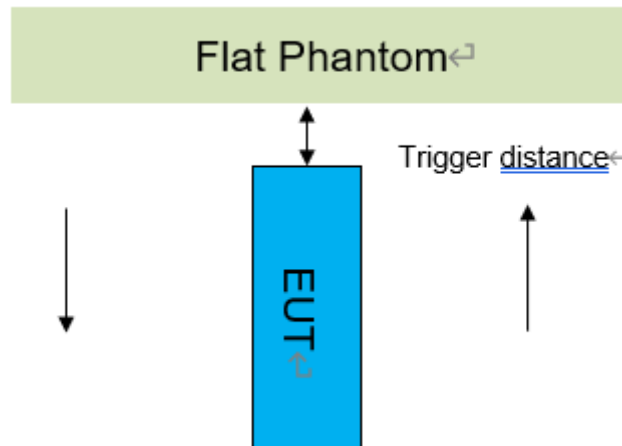
The UMPC mini-tablet procedures must also be applied to test the SAR of all surfaces and edges with an antenna located at ≤ 25 mm from that surface or edge, in direct contact with a flat phantom, for Product Specific 10-g SAR according to the body-equivalent tissue dielectric parameters in KDB 865664 to address interactive hand use exposure conditions. The UMPC mini-tablet 1-g SAR at 5 mm is not required. When hotspot mode applies, Product Specific 10-g SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg; however, when power reduction applies to hotspot mode the measured SAR must be scaled to the maximum output power, including tolerance, allowed for phablet modes to compare with the 1.2 W/kg SAR test reduction threshold.

The device does not support hotspot function and is a Phablet in the Open state. Therefore, we added Product Specific 10-g SAR for all surfaces and edges with an antenna located at ≤ 25 mm from that surface or edge in the Open state.

5.4 Proximity Sensor Triggering Test

5.4.1 Proximity sensor triggering distances

The Proximity sensor triggering was applied to the below table list antenna. Proximity sensor triggering distance testing was performed according to the procedures outlined in KDB 616217 D04 section 6.2, and EUT moving further away from the flat phantom and EUT moving toward the flat phantom were both assessed.

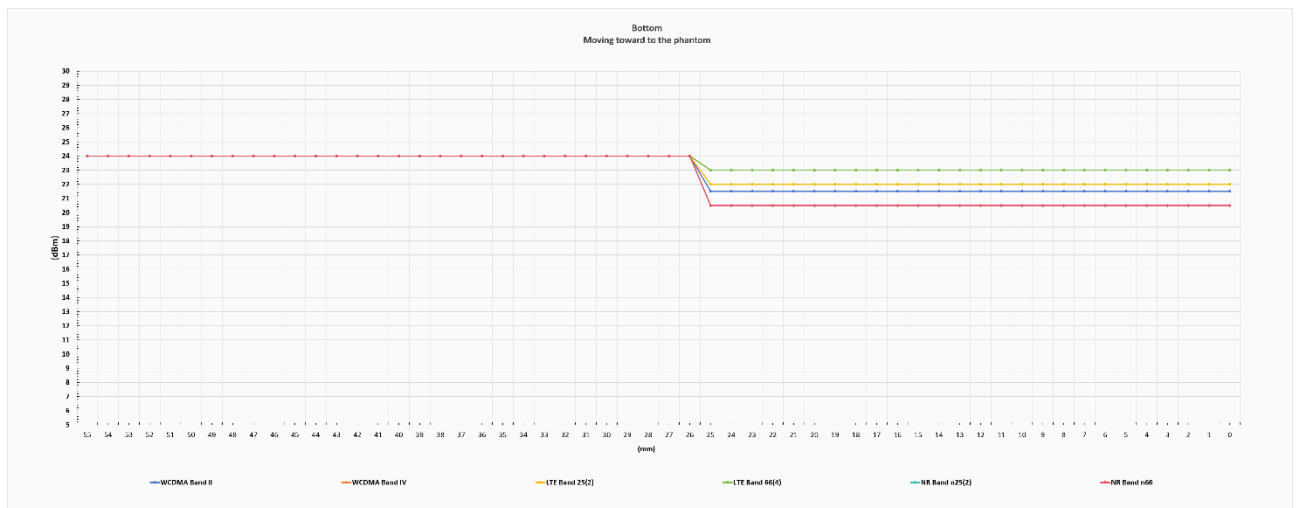
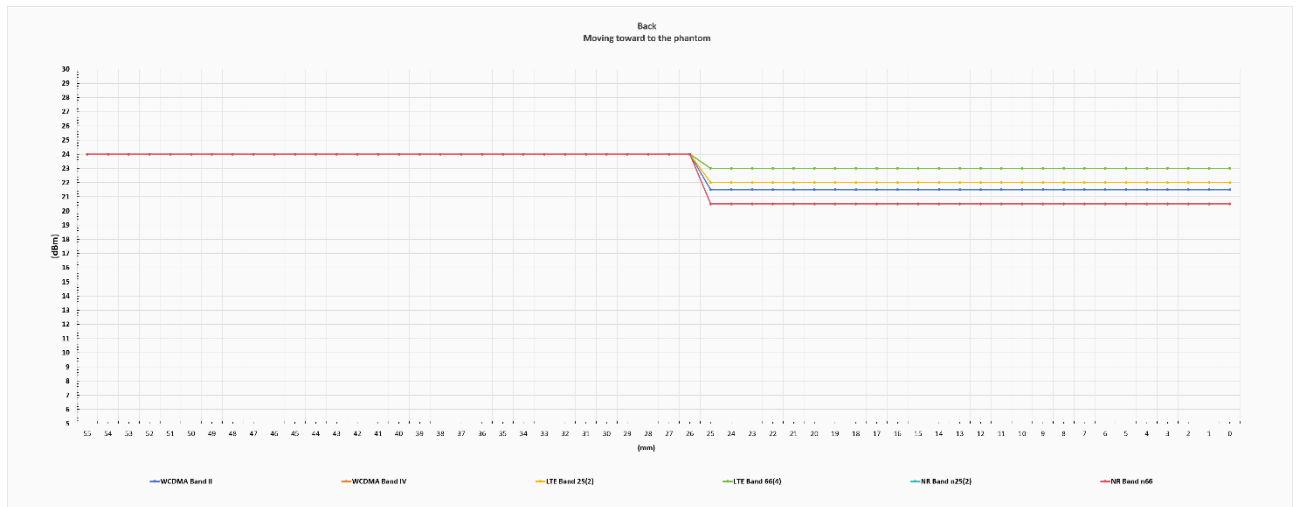


Proximity Sensor Triggering Distance(mm)				
Ant.0/4/5/6/7				
Position	Back Side	Left Side	Right Side	Bottom Side
Minimum	25	14	19	26

Note:

SAR tests with proximity sensor power reduction are only required for the sides of frequency bands in the table above. For the other sides or other frequency bands of the device, SAR is still tested at the maximum power level with sensor off.

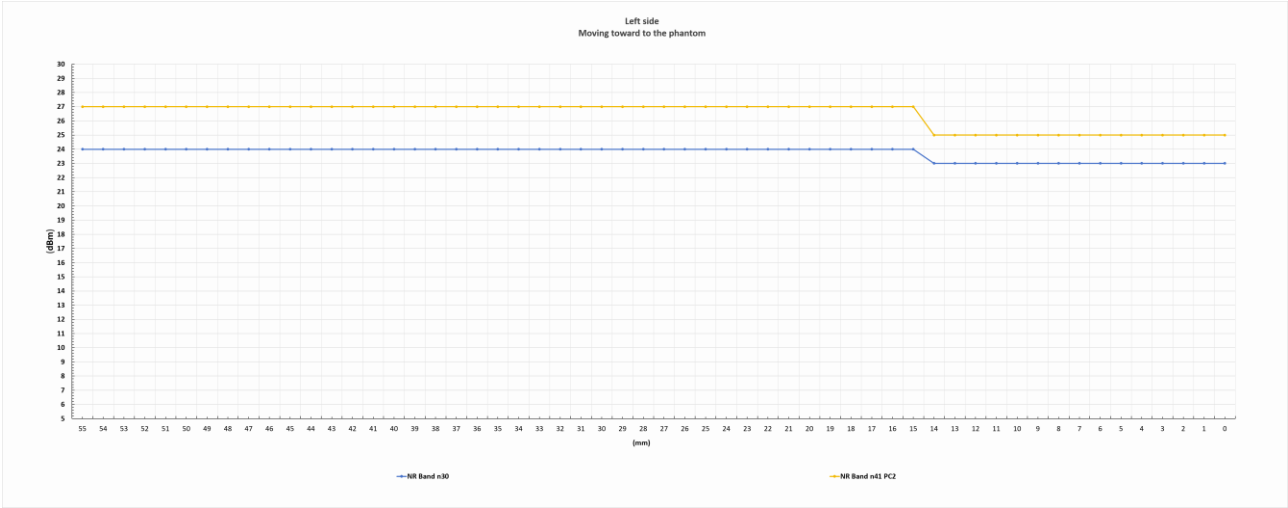
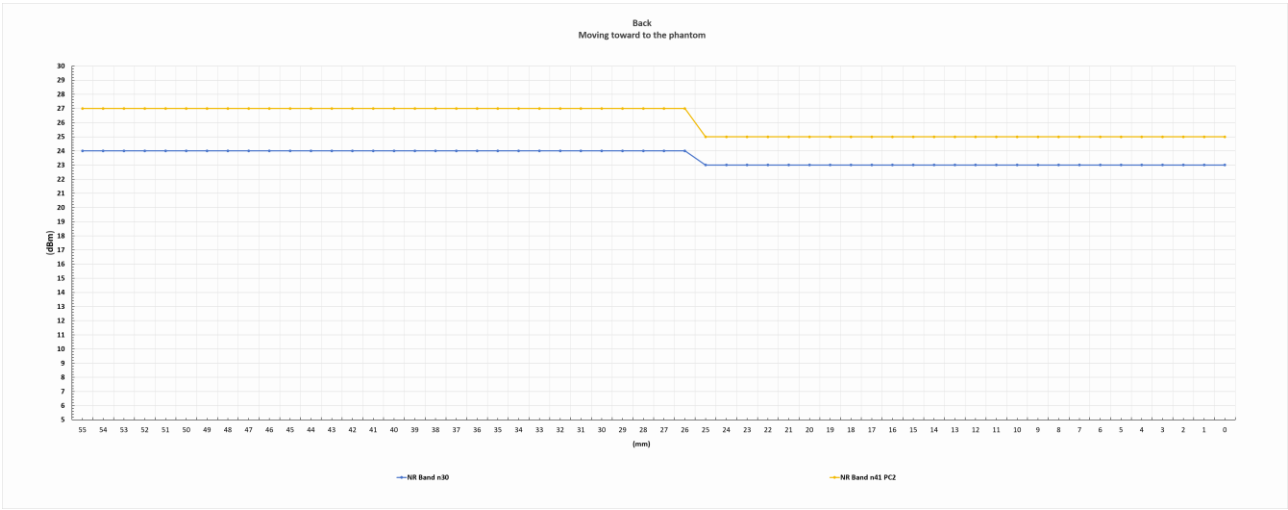
● Ant 0 DUT Moving Toward(Trigger)the Phantom



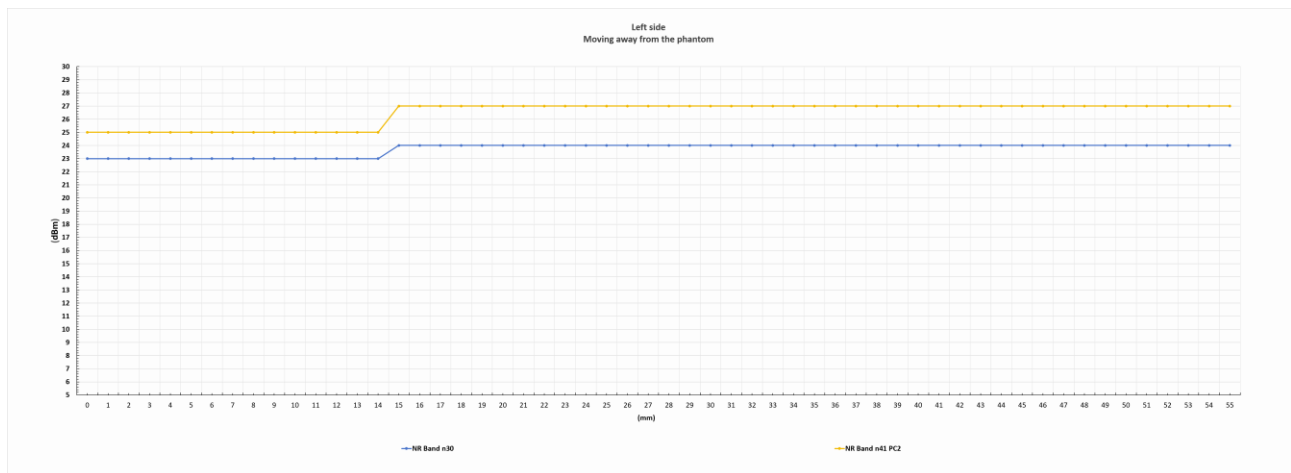
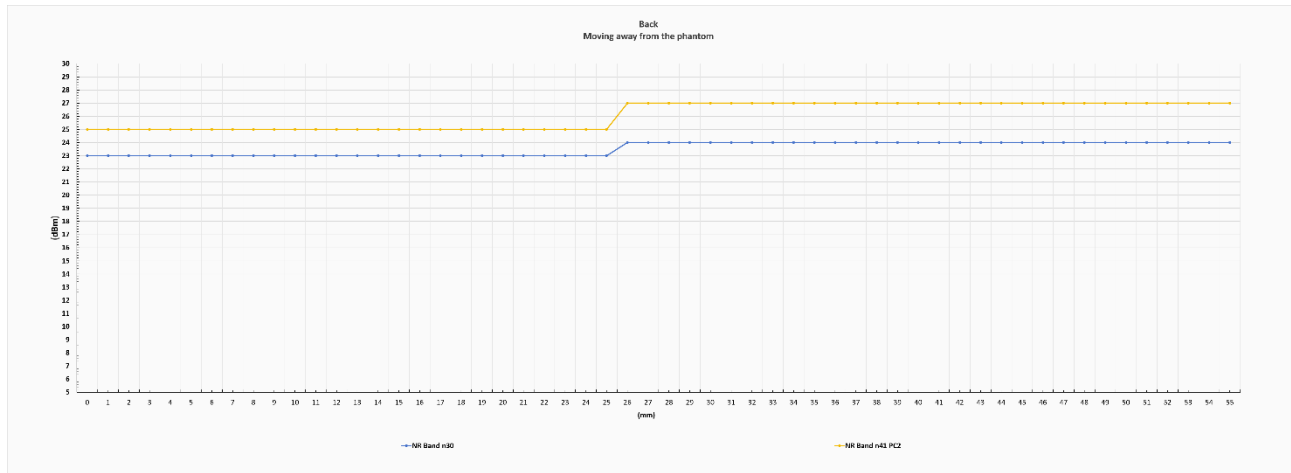
● Ant 0 DUT Moving Away(Release) from the Phantom



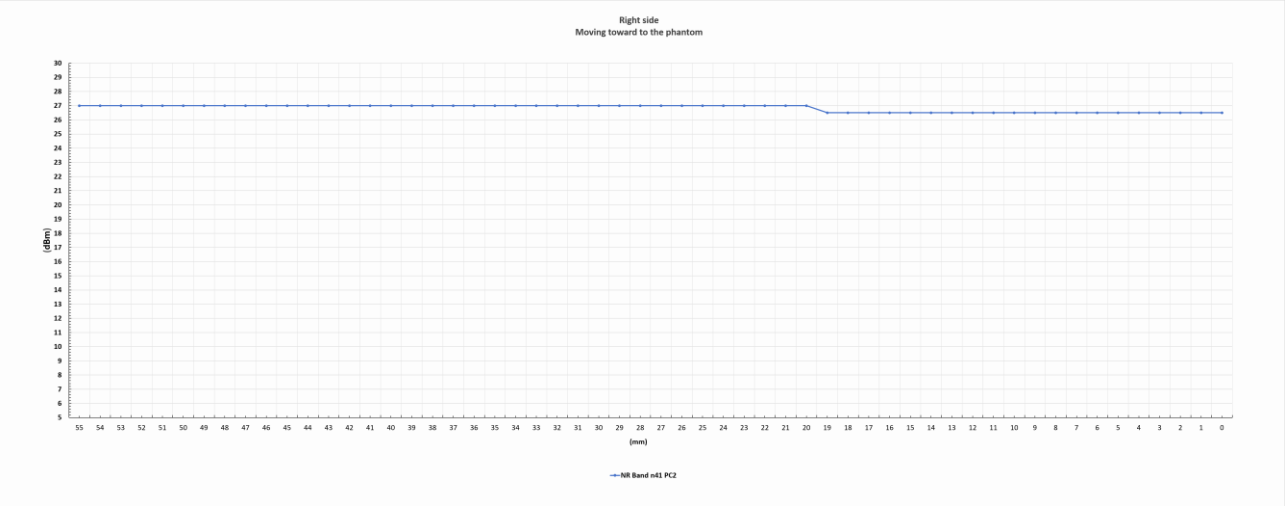
● Ant 4 DUT Moving Toward(Trigger)the Phantom



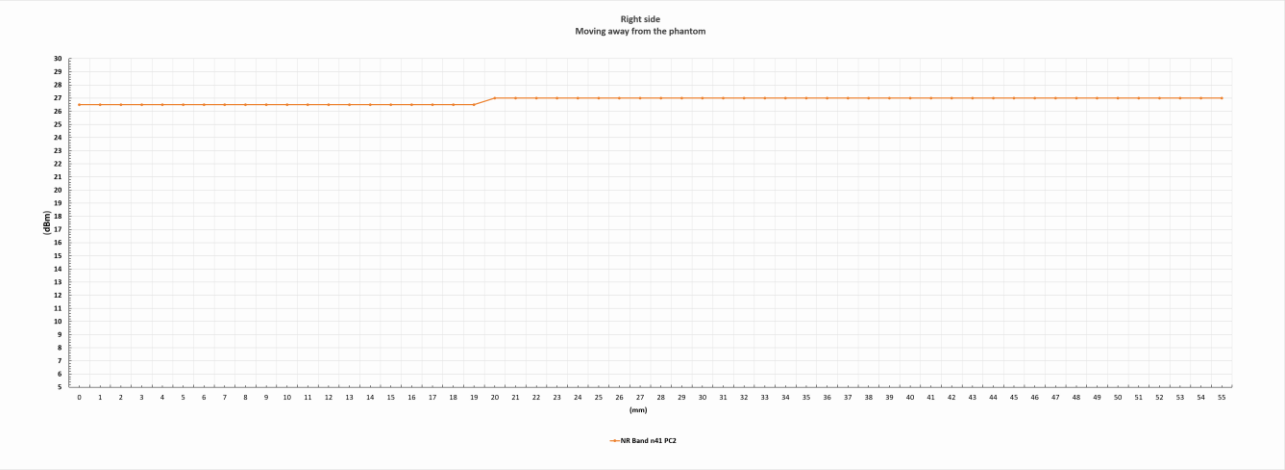
● Ant 4 DUT Moving Away(Release) from the Phantom



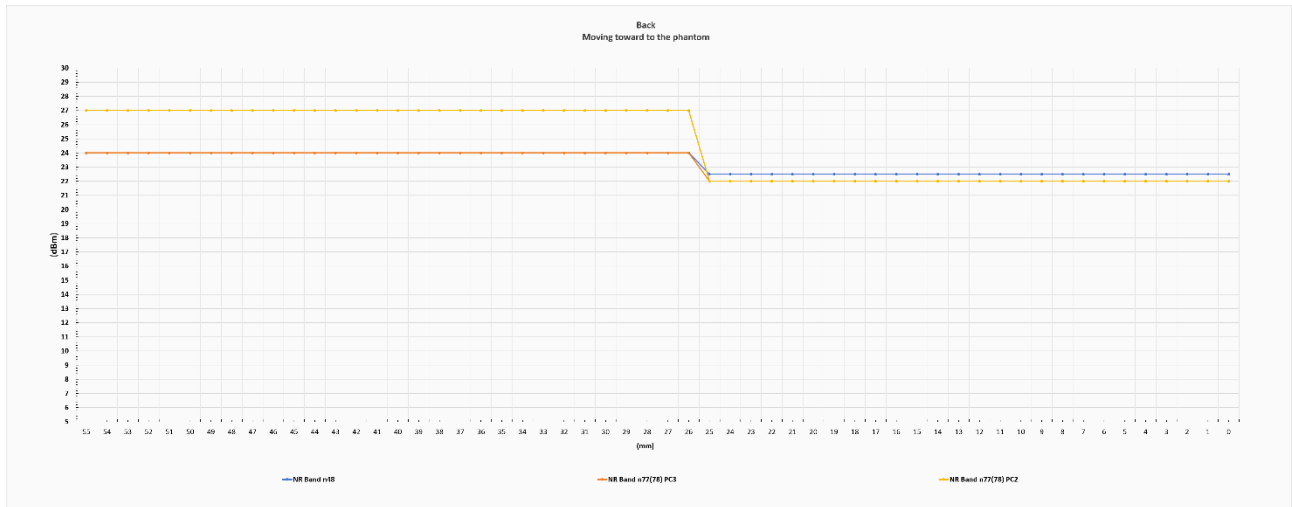
● Ant 5 DUT Moving Toward(Trigger)the Phantom



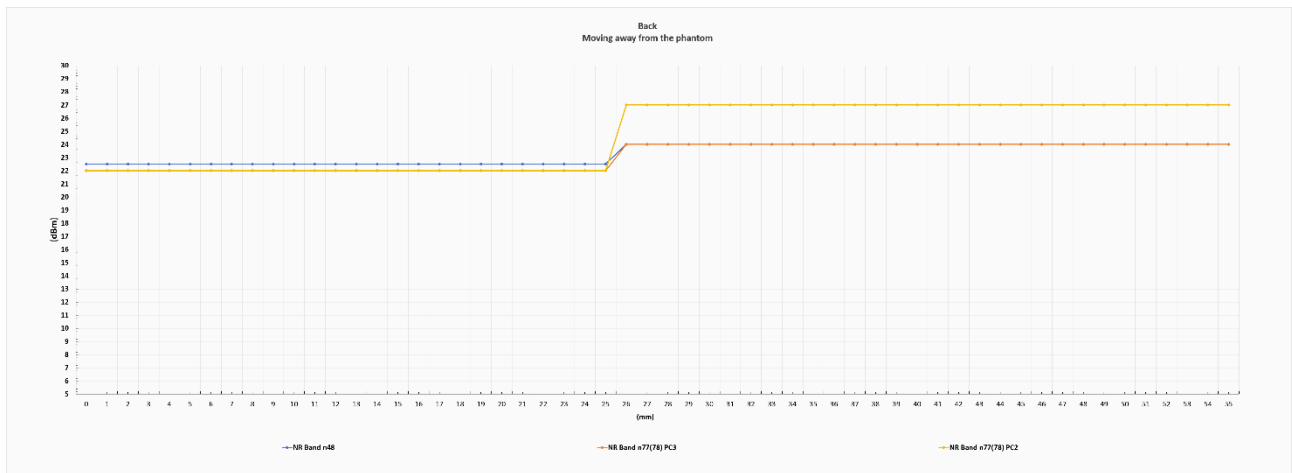
● Ant 5 DUT Moving Away(Release) from the Phantom



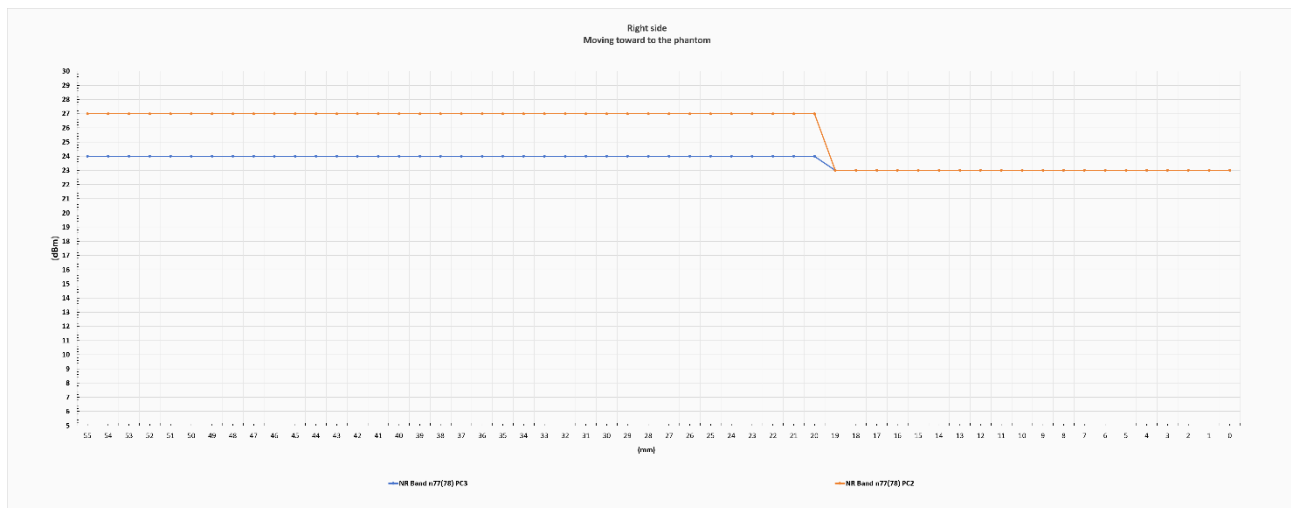
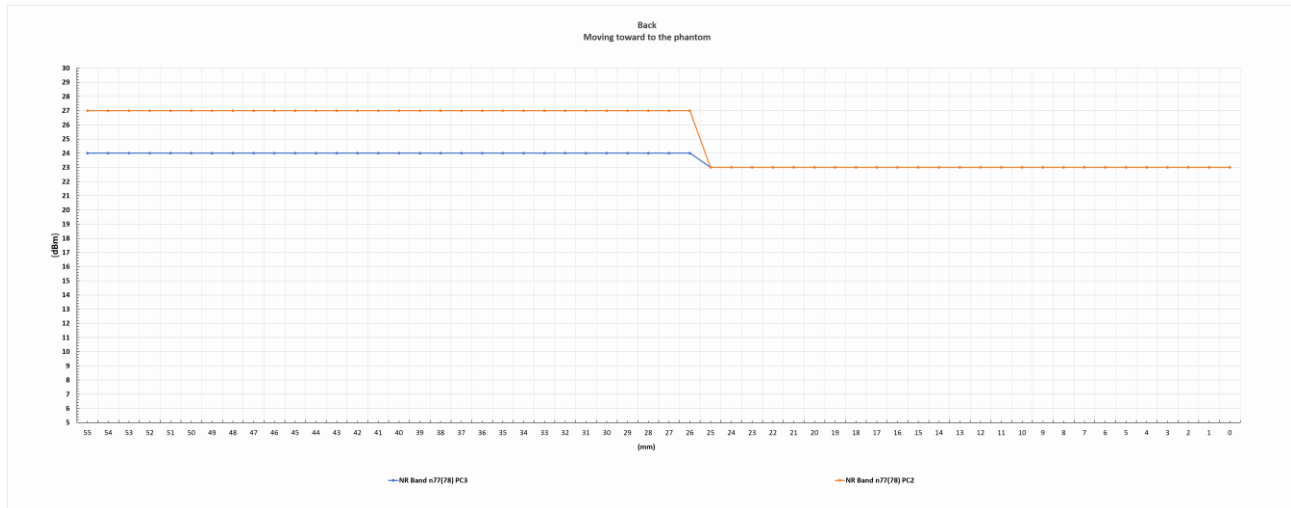
● Ant 6 DUT Moving Toward(Trigger)the Phantom



● Ant 6 DUT Moving Away(Release) from the Phantom



● Ant 7 DUT Moving Toward(Trigger)the Phantom



● Ant 7 DUT Moving Away(Release) from the Phantom

