Prüfbericht-Nr.: *Test report no.*:	**CN24MAQ7 003**	**Auftrags-Nr.:** *Order no.*:	168544425	Seite 1 von 24 *Page 1 of 24*
Kunden-Referenz-Nr.: *Client reference no.*:	N/A	**Auftragsdatum:** *Order date:*	2025-03-24	
Auftraggeber: *Client*:	SHOKZ (SINGAPORE) PTE. LTD. 11 NORTH BUONA VISTA DRIVE #16-09 THE METROPOLIS SINGAPORE 138589, Singapore			
Prüfgegenstand: *Test item*:	OpenComm2 2025 Upgrade; OpenComm2 PTT			
Bezeichnung / Typ-Nr.: *Identification / Type no.*:	SHOKZ C120, SHOKZ C121; SHOKZ C122 (Trademark: SHOKZ)			
Auftrags-Inhalt: *Order content*:	FCC&IC approval			
Prüfgrundlage: *Test specification*:	FCC 47 CFR § 2.1093 IEEE Std 1528-2013 IC RSS-102 Issue 6: December 2023 RSS-102.SAR.MEAS Issue 1 December 15, 2023 IEC/62209-1528: 2020 Published RF exposure KDB procedures			
Wareneingangsdatum: *Date of sample receipt*:	2025-03-24			
Prüfmuster-Nr.: *Test sample no:*	A003951887			
Prüfzeitraum: *Testing period*:	2024-08-26-2025-03-31			
Ort der Prüfung: *Place of testing*:	TÜV Rheinland (Shenzhen) Co., Ltd.			
Prüflaboratorium: *Testing laboratory:*	TÜV Rheinland (Shenzhen) Co., Ltd.			
Prüfergebnis*: *Test result**:	Pass			

geprüft von: tested by:	x Signed by: Hay W. C. Wu	**genehmigt von:** *authorized by*:	x Signed by: Alex Lan
Datum: *Date:* 2025-05-19		**Ausstellungsdatum:** *Issue date:* 2025-05-19	
Stellung / Position:	Project Manager	**Stellung** / Position:	Authorizer

Sonstiges / *Other*: FCC ID: 2BCD6-C120
IC: 31129-C120 HVIN: SHOKZ C120, SHOKZ C121, SHOKZ C122
This test report based on original test report CN24MAQ7 001 to enable Bluetooth LE via software and passive NFC module.

Zustand des Prüfgegenstandes bei Anlieferung: Prüfmuster vollständig und unbeschädigt
Condition of the test item at delivery: *Test item complete and undamaged*

* Legende:	P(ass) = entspricht o.g. Prüfgrundlage(n)	F(ail) = entspricht nicht o.g. Prüfgrundlage(n)	N/A = nicht anwendbar	N/T = nicht getestet
** Legend:*	*P(ass) = passed a.m. test specification(s)*	*F(ail) = failed a.m. test specification(s)*	*N/A = not applicable*	*N/T = not tested*

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Remarks

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Table of Contents

1. General Information 5

1.1. Statement of Compliance 5

1.2. Equipment Under Test (EUT) Information 6
1.2.1. General Information 6
1.2.2. Wireless Technologies 6

2. Test Sites 7

2.1. Test Facilities 7

2.2. Ambient Condition 7

2.3. List of Test and Measurement Instruments 8

3. Measurement Uncertainty 9

4. Test Specification, Methods and Procedures 10

5. SAR Measurement System 11

5.1. Definition of Specific Absorption Rate (SAR) 11

5.2. SPEAG DASY System 11
5.2.1. Robot 12
5.2.2. Probes 13
5.2.3. Data Acquisition Electronics (DAE) 13
5.2.4. Phantoms 14
5.2.5. Device Holder 15
5.2.6. System Validation Dipoles 15
5.2.7. Tissue Simulating Liquids 16
5.2.8. SAR System Verification 18

6. SAR Measurement Procedure 19

6.1. Area & Zoom Scan Procedure 19

6.2. Volume Scan Procedure 19

6.3. Power Drift Monitoring 20

6.4. Spatial Peak SAR Evaluation 20

6.5. SAR Averaged Methods 20

7. SAR Measurement Evaluation 21

7.1. EUT Configuration and Setting 21

7.2. EUT Testing Position 21
7.2.1. Head Exposure Conditions 21

7.3. Tissue Verification 21

7.4. System Validation 21

7.5. System Verification 21

8. SAR Measurement Evaluation 22

8.1. Maximum Conducted Power 22

8.2. SAR Testing Results 23

8.2.1. SAR Test Reduction Considerations 23
8.2.2. SAR Results for Head Exposure Condition 23
8.2.3. SAR Measurement Variability 23

APPENDIXES 24

Appendix A: SAR Plots of System Verification

Appendix B: SAR Plots of SAR Measurement

Appendix C: Calibration Certificate for probe and Dipole

Appendix D: Photographs of EUT and setup

1. General Information

1.1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for the EUT are as follows:

Mode	Highest Reported Head SAR_{1g} (0 cm Gap) (W/kg)
Bluetooth	**0.79**

Note:
This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6W/kg as averaged over any 1 gram of tissue; 10-gram SAR for Product Specific 10g SAR, limit: 4.0W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992/ IC RSS-102 Issue 6:2023, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

1.2. Equipment Under Test (EUT) Information

1.2.1. General Information

Equipment Name	OpenComm2 2025 Upgrade; OpenComm2 PTT
FCC ID	2BCD6-C120
IC	31129-C120
Brand Name	SHOKZ
Model Name	SHOKZ C120, SHOKZ C121; SHOKZ C122
HW Version	1.0
SW Version	HC_PTTHU_V_01_20250318
Antenna Type	PIFA Antenna and antenna gain -1dBi
EUT Stage	Production Unit

1.2.2. Wireless Technologies

Wireless Technology and Frequency Range	Bluetooth: 2402 MHz ~ 2480 MHz
Uplink Modulations	Bluetooth® GFSK, π/4-DQPSK, 8-DPSK, LE 1M

Note:

1. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

2. Test Sites

2.1. Test Facilities

TÜV Rheinland (Shenzhen) Co., Ltd.

No. 362 Huanguan Road Middle Longhua District, Shenzhen 518110 People's Republic of China

A2LA Cert. No.: 5162.01

FCC Registration No.: 694916

IC Registration No.: 25069

2.2. Ambient Condition

Ambient Temperature	22.5°C ~ 22.6°C
Relative Humidity	48% ~ 53%

2.3. List of Test and Measurement Instruments

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	1014	Jun. 06, 2024	3 years
Dosimetric E-Field Probe	SPEAG	EX3DV4	7738	Dec. 13, 2023	1 year
Dosimetric E-Field Probe	SPEAG	EX3DV4	7506	Nov. 12, 2024	1 year
Data Acquisition Electronics	SPEAG	DAE4	1725	Oct. 26, 2023	1 year
Data Acquisition Electronics	SPEAG	DAE4	1557	Oct. 08, 2024	1 year
Signal Analyzer	R&S	FSV 7	103665	Sep. 29, 2024	1 year
Vector Network Analyzer	R&S	ZNB 8	107040	Sep. 29, 2024	1 year
Signal Generator	R&S	SMB 100A	180840	Sep. 29, 2024	1 year
EPM Series Power Meter	Keysight	N1914A	MY58240005	Oct. 29, 2024	1 year
Power Sensor	Keysight	N8481H	MY58250002	Oct. 29, 2024	1 year
Power Sensor	Keysight	N8481H	MY58250006	Oct. 29, 2024	1 year
DC Power Supply	Topward	3303D	809332	Oct. 29, 2024	1 year
Coaxial Directional Couper	Keysight	773D	MY52180552	Oct. 29, 2024	1 year
Coaxial Directional Couper	shhuaxiang	DTO-0.4/3.9-10	18052101	Oct. 29, 2024	1 year
Coaxial attenuator	Keysight	8491A	MY52463219	Oct. 29, 2024	1 year
Coaxial attenuator	Keysight	8491A	MY52463210	Oct. 29, 2024	1 year
Coaxial attenuator	Keysight	8491A	MY52463222	Oct. 29, 2024	1 year
Digital Thermometer	LKM	DTM3000	3116	Nov. 04, 2024	1 year
Power Amplifier Mini circuit	mini-circuits	ZHL-42W	SN002101809	N/A	N/A
Power Amplifier Mini circuit	mini-circuits	ZVE-8G	SN070501814	N/A	N/A
PHANTOM	SPEAG	ELI V8.0	2094	N/A	N/A

3. Measurement Uncertainty

Source of Uncertainty	Tolerance (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)	Vi Veff
Measurement System Errors								
Probe Calibration	±12.7%	Normal (k=2)	2	1	1	± 6.35 %	± 6.35 %	∞
Probe Calibration Drift	±1.7%	Rectangular	√3	1	1	±1.0%	±1.0%	∞
Probe Linearity	±4.7%	Rectangular	√3	1	1	±2.7%	±2.7%	∞
Broadband Signal	±3.0%	Rectangular	√3	1	1	±1.7%	±1.7%	∞
Probe Isotropy	±7.6%	Rectangular	√3	1	1	±4.4%	±4.4%	∞
Other Probe + Electronic	±0.7%	Normal	1	1	1	±0.7%	±0.7%	∞
RF Ambient	±1.8%	Normal	1	1	1	±1.8%	±1.8%	∞
Probe Positioning	±0.006mm	Normal	1	0.14	0.14	±0.10%	±0.10%	∞
Data Processing	±1.2%	Normal	1	1	1	±1.2%	±1.2%	∞
Phantom and Device Errors								
Conductivity (meas.)[DAK]	±2.5%	Normal	1	0.78	0.71	±2.0%	±1.8%	100
Conductivity (temp.)[BB]	±3.3%	Rectangular	√3	0.78	0.71	±1.5%	±1.4%	∞
Phantom Permittivity	±14.0%	Rectangular	√3	0	0	±0%	±0%	∞
Distance DUT – TSL	±2.0%	Normal	1	2	2	±4.0%	±4.0%	∞
Device Positioning	±2.4%/±2.8%	Normal	1	1	1	±2.8%	±2.8%	30
Device Holder	±3.4%/±3.5%	Normal	1	1	1	±3.5%	±3.5%	30
DUT Modulation[m]	±2.4%	Rectangular	√3	1	1	±1.4%	±1.4%	∞
Time-average SAR	±1.7%	Rectangular	√3	1	1	±1.0%	±1.0%	∞
DUT drift	±2.5%	Normal	1	1	1	±2.5%	±2.5%	30
Val Antenna Unc.[val]	±0.0%	Normal	1	1	1	±0%	±0%	
Unc. Input Power[val]	±0.0%	Normal	1	1	1	±0%	±0%	
Correction to the SAR results								
C(ε,σ)	±1.9%	Normal	1	1	0.84	±1.9%	±1.6%	
SAR scaling[p]	±0.0%	Rectangular	√3	1	1	±0%	±0%	
Combined Standard Uncertainty (K = 1)						±12.54%	±12.44%	
Expanded Uncertainty (K = 2)						**±25.1%**	**±24.9%**	

Uncertainty budget for frequency range 300 MHz to 3 GHz

4. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528- 2013, the following FCC Published RF exposure KDB procedures & manufacturer KDB inquiries:

- KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- KDB 865664 D02 RF Exposure Reporting v01r02
- KDB 447498 D04 Interim General RF Exposure Guidance v01
- IC RSS-102 Issue 6: December 2023 Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
- IC RSS-102.SAR.MEAS — Measurement Procedure for Assessing Specific Absorption Rate (SAR) Compliance in Accordance with RSS-102 Issue 1 December 15, 2023
- IEC/IEEE 62209-1528:2020 Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)

In addition to the above, the following information was used:

- TCB workshop April, 2019; Page 19, Tissue Simulating Liquids(TSL)

5. SAR Measurement System

5.1. Definition of Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

$$\mathbf{SAR} = \frac{\mathbf{d}}{\mathbf{dt}}\left(\frac{\mathbf{dW}}{\mathbf{dm}}\right) = \frac{\mathbf{d}}{\mathbf{dt}}\left(\frac{\mathbf{dW}}{\boldsymbol{\rho}\mathbf{dv}}\right)$$

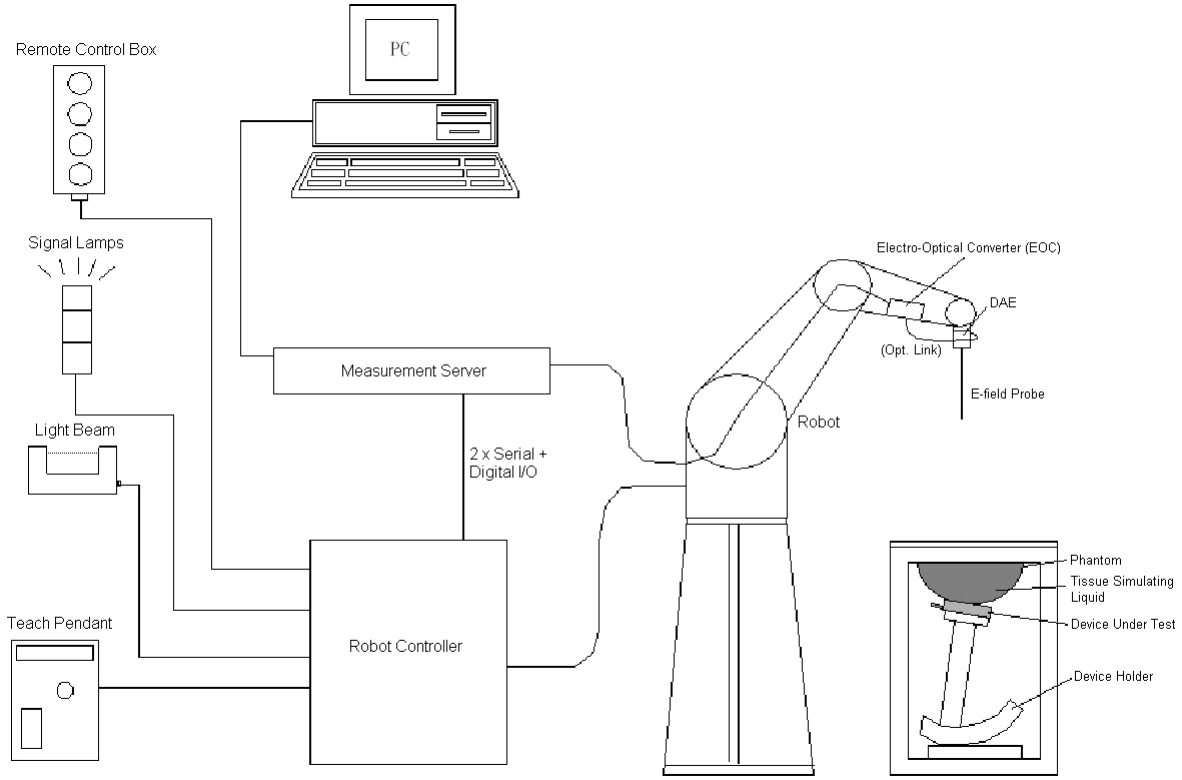
SAR is expressed in units of Watts per kilogram (W/kg)
SAR measurement can be related to the electrical field in the tissue by

$$\mathbf{SAR} = \frac{\boldsymbol{\sigma}|\mathbf{E}|^2}{\boldsymbol{\rho}}$$

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

5.2. SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.



DASY System Setup

5.2.1.Robot

The DASY system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ±0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

DASY6

5.2.2. Probes

The SAR measurement is conducted with the dosimetric probe. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

Model	EX3DV4	
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	4 MHz – 10 GHz Linearity: ±0.2 dB (30 MHz – 10 GHz)	
Directivity	±0.1 dB in TSL (rotation around probe axis) ±0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 µW/g – >100 mW/g Linearity: ±0.2 dB (noise: typically <1 µW/g)	
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 2.5 mm (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

5.2.3.Data Acquisition Electronics (DAE)

Model	DAE4	
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 fA	
Dimensions	60 x 60 x 68 mm	

5.2.4. Phantoms

Model	Twin SAM	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEC/IEEE 62209-1528. 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.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	

Model	ELI	
Construction	The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 4 MHz to 10 GHz. ELI is fully compatible with the IEC/IEEE 62209-1528 standard and all known tissue simulating liquids. 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 of SPEAG's dosimetric probes and dipoles.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	

5.2.5. Device Holder

Model	Mounting Device	
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
Material	POM	

Model	Laptop Extensions Kit	
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-1528 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
Material	POM, Acrylic glass, Foam	

5.2.6.System Validation Dipoles

Model	D-Serial	
Construction	Symmetrical dipole with l/4 balun. Enables measurement of feed point impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
Frequency	750 MHz to 5800 MHz	
Return Loss	> 20 dB	
Power Capability	> 100 W (f < 1GHz), > 40 W (f > 1GHz)	

5.2.7. Tissue Simulating Liquids

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 height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed.

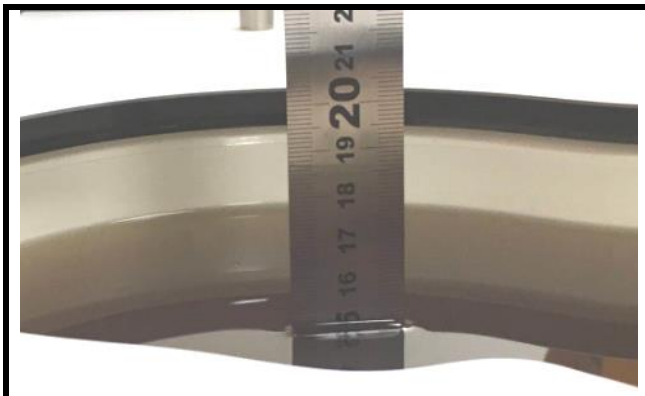
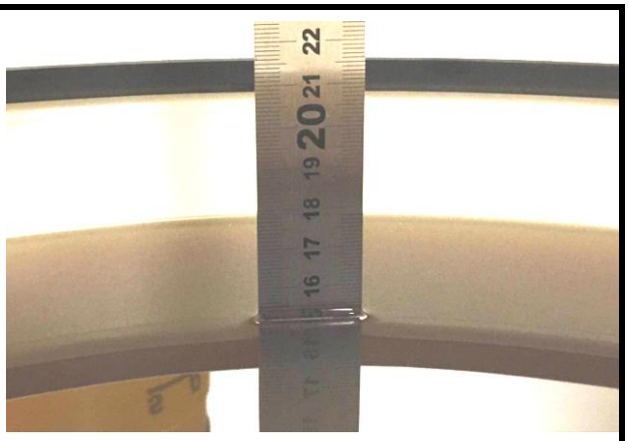
	

Photo of Liquid Height for Head Position	**Photo of Liquid Height for Body Position**

The dielectric properties of the head tissue simulating liquids are defined in IEEE 1528, and KDB 865664 D01 Appendix A. For the body tissue simulating liquids, the dielectric properties are defined in KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

Targets of Tissue Simulating Liquid

Frequency (MHz)	Target Permittivity	Range of ±5%	Target Conductivity	Range of ±5%
For Head				
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53

The following table gives the recipes for tissue simulating liquids.

Recipes of Tissue Simulating Liquid

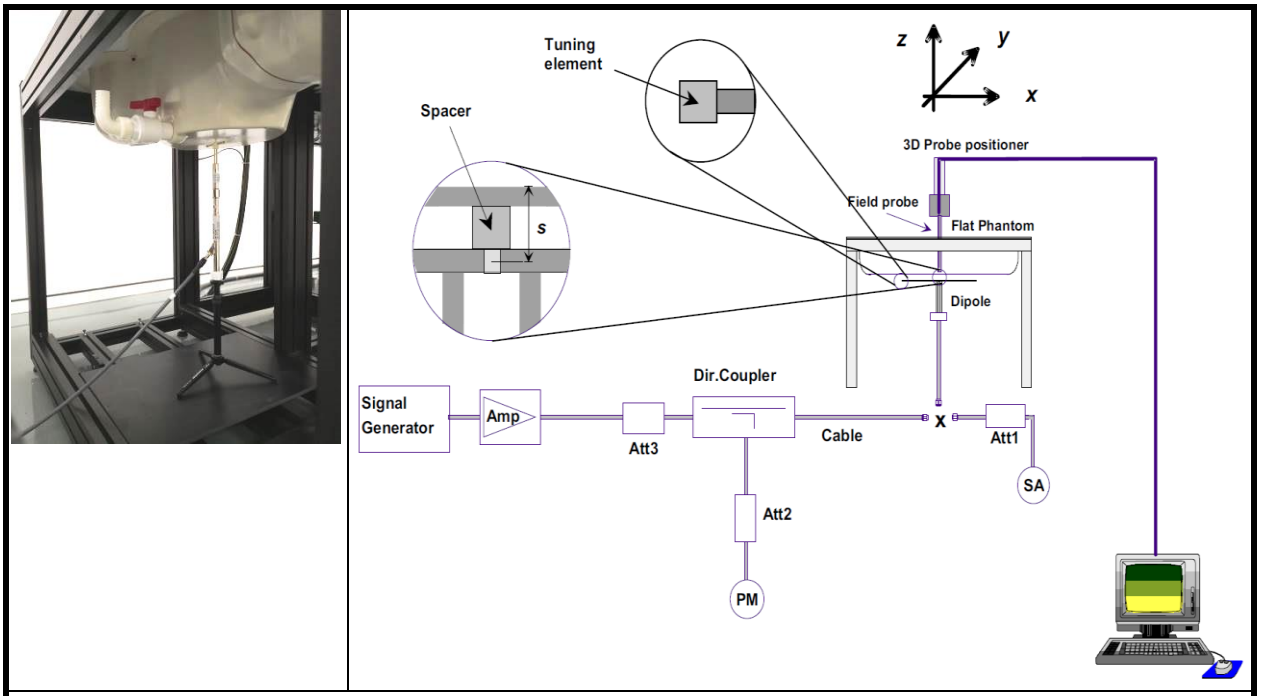
Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

Simulating Head Liquid (HBBL600-6000MHz), Manufactured by SPEAG:

Water (% by weight)	Esters, Emulsifiers, Inhibitors (% by weight)	Sodium salt (% by weight)
50 - 65%	10 - 30%	8 - 25%

5.2.8.SAR System Verification

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.



System Verification Setup

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 2 GHz, 100 mW is used for 2 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

6. SAR Measurement Procedure

According to the SAR 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

The SAR measurement procedures for each of test conditions are as follows:

(a) Make EUT to transmit maximum output power
(b) Measure conducted output power through RF cable
(c) Place the EUT in the specific position of phantom
(d) Perform SAR testing steps on the DASY system
(e) Record the SAR value

6.1. Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664 D01, the resolution for Area and Zoom scan is specified in the table below.

Items	<= 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan (Δx, Δy)	<= 15 mm	<= 12 mm	<= 12 mm	<= 10 mm	<= 10 mm
Zoom Scan (Δx, Δy)	<= 8 mm	<= 5 mm	<= 5 mm	<= 4 mm	<= 4 mm
Zoom Scan (Δz)	<= 5 mm	<= 5 mm	<= 4 mm	<= 3 mm	<= 2 mm
Zoom Scan Volume	>= 30 mm	>= 30 mm	>= 28 mm	>= 25 mm	>= 22 mm

Note:
When zoom scan is required and report SAR is <= 1.4 W/kg, the zoom scan resolution of Δx / Δy (2-3GHz: <= 8 mm, 3-4GHz: <= 7 mm, 4-6GHz: <= 5 mm) may be applied.

6.2. Volume Scan Procedure

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

6.3. Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY 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 dB. If the power drift more than 5%, the SAR will be retested.

6.4. Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

(a) Extraction of the measured data (grid and values) from the Zoom Scan
(b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
(c) Generation of a high-resolution mesh within the measured volume
(d) Interpolation of all measured values form the measurement grid to the high-resolution grid
(e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
(f) Calculation of the averaged SAR within masses of 1g and 10g

6.5. SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard’s method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

7. SAR Measurement Evaluation

7.1. EUT Configuration and Setting

<Considerations Related to Bluetooth for Setup and Testing>

This device has installed Bluetooth engineering testing software which can provide continuous transmitting RF signal. During Bluetooth SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

7.2. EUT Testing Position

7.2.1. Head Exposure Conditions

This device is a Bluetooth headset that are used in the head position, SAR evaluation is required on inside and Outside of the headset, at 0 mm separation from a flat phantom.

7.3. Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Measured Conductivity (σ)	Measured Permittivity (ε_r)	Target Conductivity (σ)	Target Permittivity (ε_r)	Conductivity Deviation (%)	Permittivity Deviation (%)
Aug. 26, 2024	H2450	2450	1.872	38.153	1.80	39.20	4.00	-2.67
		2402	1.836	38.242	1.76	39.29	4.44	-2.67
		2441	1.864	38.168	1.79	39.21	4.02	-2.66
		2480	1.895	38.092	1.83	39.16	3.44	-2.73
Mar. 31, 2025	H2450	2450	1.872	38.152	1.80	39.20	4.00	-2.67
		2440	1.864	38.178	1.79	39.21	4.02	-2.63

Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within ±5% of the target values. Liquid temperature during the SAR testing must be within ±2 ℃.

7.4. System Validation

The SAR measurement system was validated according to procedures in KDB 865664 D01. The validation status in tabulated summary is as below.

Test Date	Probe S/N	Calibration Point		Measured Conductivity (σ)	Measured Permittivity (ε_r)	Validation for CW			Validation for Modulation		
						Sensitivity Range	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
Aug. 26, 2024	7738	Head	2450	1.872	38.153	Pass	Pass	Pass	GFSK	N/A	Pass
Mar. 31, 2025	7506	Head	2450	1.872	38.152	Pass	Pass	Pass	GFSK	N/A	Pass

7.5. System Verification

The measuring result for system verification is tabulated as below.

Test Date	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Aug. 26, 2024	2450	53.40	13.30	53.20	-0.37	1014	7738	1725
Mar. 31, 2025	2450	53.40	5.02	50.16	-6.07	1014	7506	1557

Note:

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

8. SAR Measurement Evaluation

8.1. Maximum Conducted Power

All Rate have been tested, the Worst average power (Unit: dBm) is shown as below.

<Bluetooth>

Mode	**Bluetooth GFSK**		
Channel / Frequency (MHz)	**0 (2402)**	**39 (2441)**	**78 (2480)**
Average Power	**9.60**	9.38	9.44
Targeted Power	**10.0**		
Mode	**Bluetooth π/4-DQPSK**		
Channel / Frequency (MHz)	**0 (2402)**	**39 (2441)**	**78 (2480)**
Average Power	**9.57**	9.39	9.36
Targeted Power	**10.0**		
Mode	**Bluetooth 8DPSK**		
Channel / Frequency (MHz)	**0 (2402)**	**39 (2441)**	**78 (2480)**
Average Power	**9.47**	9.41	9.32
Targeted Power	**10.0**		

Mode	**BLE 1M**		
Channel / Frequency (MHz)	**0 (2402)**	**19 (2440)**	**38 (2480)**
Average Power	6.6	**6.6**	6.06
Targeted Power	**7.0**		

8.2. SAR Testing Results

8.2.1. SAR Test Reduction Considerations

<KDB 447498 D01, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

(1) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz

(2) ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz

(3) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

8.2.2. SAR Results for Head Exposure Condition

Plot No.	Band	Mode	Test Position	Ch.	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Scaling Factor	Power Drift (dB)	Measured SAR-1g (W/kg)	Scaled SAR-1g (W/kg)
	BT	DH5	Inside of earphone	0	10.0	9.60	1.10	-0.05	0.482	0.53
	BT	DH5	Outside of earphone	0	10.0	9.60	1.10	0.00	0.680	0.75
1	BT	DH5	Outside of earphone	39	10.0	9.38	1.15	0.13	0.687	**0.79**
	BT	DH5	Outside of earphone	78	10.0	9.44	1.14	-0.11	0.645	0.73
2	BLE	1M	Outside of earphone	19	7.0	6.6	1.09	0.00	0.102	0.11

8.2.3. SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10, the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

Since all the measured SAR are less than 0.8 W/kg, the repeated measurement is not required.

Test Engineer: Warren Xiong,

Appendixes

All attachments are integral parts of this test report. This applies especially to the following appendix:

Appendix A: SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.

Appendix B: SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination, and measured SAR > 1.5 W/kg are shown as follows.

Appendix C: Calibration Certificate for probe and Dipole

Appendix D: Photographs of EUT and setup

Test Laboratory: TÜV Rheinland (Shenzhen) Co., Ltd. Date: 2024/8/26

System Check-D2450V2_H2450

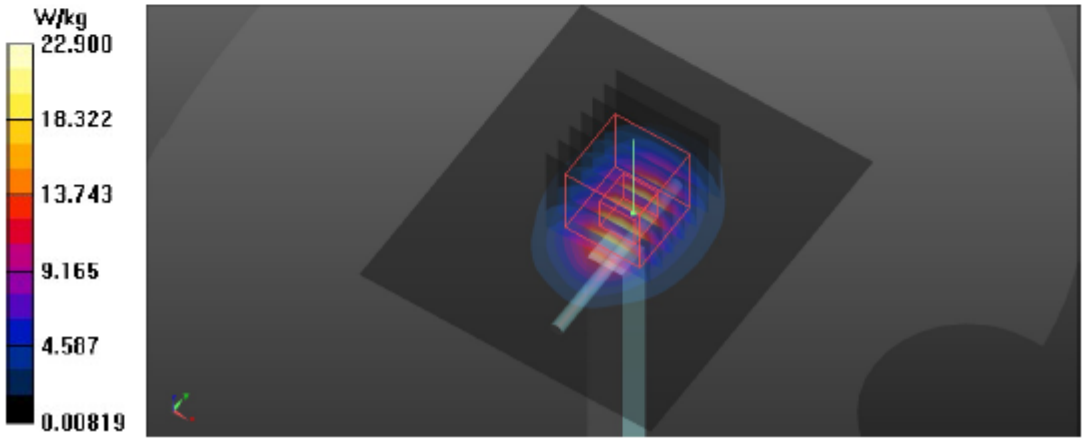
DUT: Dipole 2450 MHz D2450V2 SN:1014

Communication System: UID 0, CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: H2450 Medium parameters used: f = 2450 MHz; σ = 1.872 S/m; ε_r = 38.153; ρ = 1000 kg/m^3

DASY5 Configuration:
- Probe: EX3DV4 - SN7738; ConvF(7.6, 7.6, 7.6) @ 2450 MHz; Calibrated: 2023/12/13
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1725; Calibrated: 2023/10/26
- Phantom: SAM 1; Type: QD 000 P40 CB; Serial: 1961
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

Pin=250 mW/Area Scan (71x81x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 22.9 W/kg

Pin=250 mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 111.1 V/m; Power Drift = 0.02 dB
Peak SAR (extrapolated) = 27.8 W/kg
SAR(1 g) = 13.3 W/kg; SAR(10 g) = 6.14 W/kg
Smallest distance from peaks to all points 3 dB below = 9 mm
Ratio of SAR at M2 to SAR at M1 = 48.4%
Maximum value of SAR (measured) = 22.2 W/kg



Test Laboratory: TÜV Rheinland (Shenzhen) Co., Ltd. Date: 2025/3/31

System Check-D2450V2_H2450

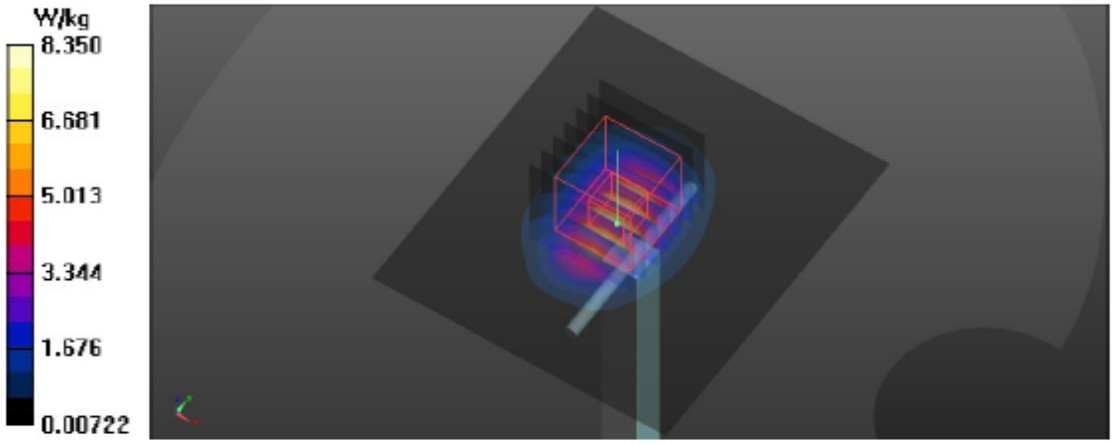
DUT: Dipole 2450 MHz D2450V2 SN:1014

Communication System: UID 0, CW; Frequency: 2450 MHz;Duty Cycle: 1:1
Medium: H2450 Medium parameters used: f = 2450 MHz; σ = 1.872 S/m; ε_r = 38.152; ρ = 1000 kg/m^3

DASY5 Configuration:
- Probe: EX3DV4 - SN7506; ConvF(6.78, 7.22, 6.73) @ 2450 MHz; Calibrated: 2024/11/12
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1557; Calibrated: 2024/10/8
- Phantom: SAM 1; Type: QD 000 P40 CB; Serial: 1961
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

Pin=100 mW/Area Scan (71x81x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 8.35 W/kg

Pin=100 mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 67.60 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 9.62 W/kg
SAR(1 g) = 5.16 W/kg; SAR(10 g) = 2.49 W/kg
Smallest distance from peaks to all points 3 dB below = 8.9 mm
Ratio of SAR at M2 to SAR at M1 = 54.6%
Maximum value of SAR (measured) = 8.14 W/kg



Test Laboratory: TÜV Rheinland (Shenzhen) Co., Ltd. Date: 2024/8/26

P01 BT_GFSK_Outside_Ch39

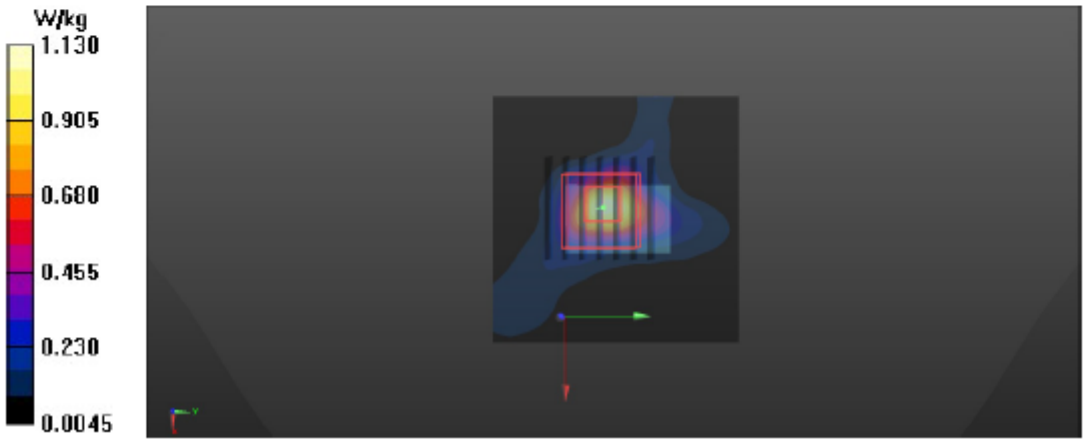
DUT: EUT

Communication System: UID 0, BT; Frequency: 2441 MHz;Duty Cycle: 1:1
Medium: H2450 Medium parameters used: f = 2441 MHz; σ = 1.864 S/m; ε_r = 38.168; ρ = 1000 kg/m^3

DASY5 Configuration:
- Probe: EX3DV4 - SN7738; ConvF(7.6, 7.6, 7.6) @ 2441 MHz; Calibrated: 2023/12/13
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1725; Calibrated: 2023/10/26
- Phantom: SAM 1; Type: QD 000 P40 CB; Serial: 1961
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

- Area Scan (61x61x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 1.13 W/kg

- Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 23.45 V/m; Power Drift = 0.13 dB
Peak SAR (extrapolated) = 1.81 W/kg
SAR(1 g) = 0.687 W/kg; SAR(10 g) = 0.273 W/kg
Smallest distance from peaks to all points 3 dB below = 6 mm
Ratio of SAR at M2 to SAR at M1 = 42.2%
Maximum value of SAR (measured) = 1.26 W/kg



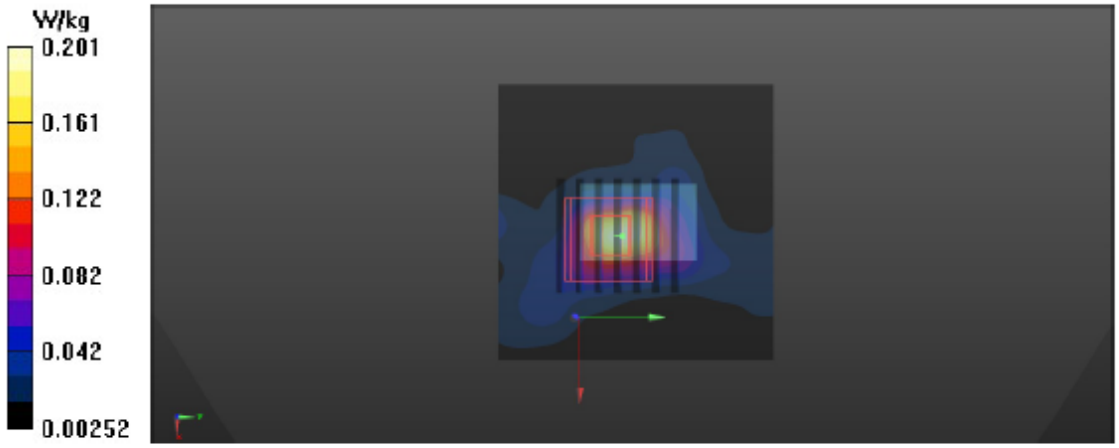
Test Laboratory: TUV Rheinland (Shenzhen) Co., Ltd. Date: 2025/3/31

P02 BLE_1M_Outside_Ch19

DUT: EUT

Communication System: UID 0, BT; Frequency: 2440 MHz;Duty Cycle: 1:1
Medium: H2450 Medium parameters used: f = 2440 MHz; σ = 1.864 S/m; ε_r = 38.178; ρ = 1000 kg/m^3

DASY5 Configuration:
- Probe: EX3DV4 - SN7506; ConvF(6.78, 7.22, 6.73) @ 2440 MHz; Calibrated: 2024/11/12
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1557; Calibrated: 2024/10/8
- Phantom: SAM 1; Type: QD 000 P40 CB; Serial: 1961
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

- Area Scan (61x61x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 0.201 W/kg

- Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 10.33 V/m; Power Drift = 0.00 dB
Peak SAR (extrapolated) = 0.326 W/kg
SAR(1 g) = 0.102 W/kg; SAR(10 g) = 0.039 W/kg
Smallest distance from peaks to all points 3 dB below = 6 mm
Ratio of SAR at M2 to SAR at M1 = 33.6%
Maximum value of SAR (measured) = 0.208 W/kg