SAR Test Report

For

Applicant Name:	**Shenzhen Umbra Technology Co., Ltd.**
Address:	Room 702, Building 11,Tianan Yungu Industrial Park, Longgang District, Shenzhen.
EUT Name:	Jartoo Baby Monitor
Brand Name:	Jartoo
Model Number:	JT-VBM002

Issued By

Company Name:	**BTF Testing Lab (Shenzhen) Co., Ltd.**
Address:	F101, 201 and 301, Building 1, Block 2, Tantou Industrial Park, Tantou Community, Songgang Street, Bao'an District, Shenzhen, China
Report Number:	BTF240430R00101
Test Standards:	47 CFR Part 2.1093 IEC/IEEE 62209-1528: 2020 IEEE C95.1-2019 KDB 447498 D01 KDB 447498 D04 KDB 865664 D01 KDB 865664 D02 KDB 248227 D01 KDB 648474 D04 KDB 941225 D07 KDB 690783 D01
FCC ID:	2BF7Y-VBM002R
Test Conclusion:	Pass
Test Date:	2024-05-07
Date of Issue:	2024-05-08

Prepared By: Amenda Zhong

Amenda Zhong / Project Engineer

Date: 2024-05-08

Approved By: Ryan.CJ

Ryan.CJ / EMC Manager

Date: 2024-05-08

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Revision History		
Version	Issue Date	Revisions Content
R_V0	2024-05-08	Original
Note:	*Once the revision has been made, then previous versions reports are invalid.*	

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1. Introduction

1.1 Identification of Testing Laboratory

Company Name:	BTF Testing Lab (Shenzhen) Co., Ltd.
Address:	F101, 201 and 301, Building 1, Block 2, Tantou Industrial Park, Tantou Community, Songgang Street, Bao'an District, Shenzhen, China
Phone Number:	+86-0755-23146130
Fax Number:	+86-0755-23146130

1.2 Identification of the Responsible Testing Location

Test Location:	BTF Testing Lab (Shenzhen) Co., Ltd.
Address:	F101, 201 and 301, Building 1, Block 2, Tantou Industrial Park, Tantou Community, Songgang Street, Bao'an District, Shenzhen, China
Description:	All measurement facilities used to collect the measurement data are located at F101,201 and 301, Building 1, Block 2, Tantou Industrial Park, Tantou Community, Songgang Street, Bao'an District, Shenzhen, China
FCC Registration Number	518915
Designation Number	CN1330

1.3 Laboratory Condition

Ambient Temperature:	21℃ to 25℃
Ambient Relative Humidity:	48% to 59%
Ambient Pressure:	100 kPa to 102 kPa

1.4 Announcement

(1) The test report reference to the report template version v0.

(2) The test report is invalid if not marked with the signatures of the persons responsible for preparing, reviewing and approving the test report.

(3) The test report is invalid if there is any evidence and/or falsification.

(4) This document may not be altered or revised in any way unless done so by BTF and all revisions are duly noted in the revisions section.

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2. Product Information

2.1 Application Information

Company Name:	Shenzhen Umbra Technology Co., Ltd.
Address:	Room 702, Building 11,Tianan Yungu Industrial Park, Longgang District, Shenzhen.

2.2 Manufacturer Information

Company Name:	Shenzhen Umbra Technology Co., Ltd.
Address:	Room 702, Building 11,Tianan Yungu Industrial Park, Longgang District, Shenzhen.

2.3 Factory Information

Company Name:	Shenzhen Umbra Technology Co., Ltd.
Address:	Room 702, Building 11,Tianan Yungu Industrial Park, Longgang District, Shenzhen.

2.4 General Description of Equipment under Test (EUT)

EUT Name	Jartoo Baby Monitor
Under Test Model Name	JT-VBM002
Software Version	V2.13
Hardware Version	V1.2
Sample No.	BTFSN240430002/1 E1

2.5 Technical Information

Network and Wireless connectivity	802.11ah WIFI module

The requirement for the following technical information of the EUT was tested in this report:

Operating Mode	802.11ah WIFI module	
Frequency Range	802.11ah WIFI module	905MHz ~ 921MHz
Antenna Type	802.11ah WIFI module: Extemal Antenna	
Hotspot Function	Not Support	
Power Reduction	Not Support	
Exposure Category	General Population/Uncontrolled exposure	
EUT Stage	Portable Device	
Product	Type	
	☐ Production unit	☒ Identical prototype

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3. Summary of Test Results

3.1 Test Standards

No.	Identity	Document Title
1	47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices
2	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)
3	IEEE C95.1-2019	IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz
4	KDB 447498 D01	General RF Exposure Guidance v06
5	KDB 447498 D04	Interim General RF Exposure Guidance v01
6	KDB 865664 D01	SAR measurement 100MHz to 6GHz v01r04
7	KDB 865664 D02	RF Exposure Reporting v01r02
8	KDB 248227 D01	802.11 Wi-Fi SAR v02r02
9	KDB 648474 D04	Handset SAR v01r03
10	KDB 941225 D07	UMPC Mini Tablet v01r02
11	KDB 690783 D01	SAR Listings on Grant v01r03

3.2 Device Category and SAR Limit

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user. Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

Body Position	SAR Value (W/Kg)	
	General Population/ Uncontrolled Exposure	Occupational/ Controlled Exposure
Whole-Body SAR (averaged over the entire body)	0.08	0.4
Partial-Body SAR (averaged over any 1 gram of tissue)	1.60	8.0
SAR for hands, wrists, feet and ankles (averaged over any 10 grams of tissue)	4.0	20.0

NOTE:
General Population/Uncontrolled Exposure: Locations where there is the exposure of individuals who have no knowledge or control of their exposure. General population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment- related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.
Occupational/Controlled Exposure: Locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

3.3 Test Result Summary

The maximum results of Specific Absorption Rate (SAR) found during test as bellows:

< Highest Reported standalone SAR Summary>

Frequency Band		Maximum Reported SAR (W/kg) 1 g
		UMPC SAR (Separation 0 mm)
802.11ah WIFI	2412.0MHz	0.144
Limits (W/kg)		1.6
Test Verdict		Pass

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3.4 Test Uncertainty

3.4.1 Measurement uncertainly evaluation for SAR test

Measurement uncertainly evaluation for SAR test (300MHz to 6GHz)

Uncertainty Component	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+- %)	10 g Ui (+-%)	Vi veff
Measurement System								
Probe calibration	5.8	N	1	1	1	5.80	5.80	∞
Axial Isotropy	3.5	R	√3	√0.5	√0.5	1.43	1.43	∞
Hemispherical Isotropy	5.9	R	√3	√0.5	√0.5	2.41	2.41	∞
Boundary effect	1.0	R	√3	1	1	0.58	0.58	∞
Linearity	4.7	R	√3	1	1	2.71	2.71	∞
System detection limits	1.0	R	√3	1	1	0.58	0.58	∞
Modulation response	3.0	R	√3	1	1	1.73	1.73	∞
Readout Electronics	0.5	N	1	1	1	0.50	0.50	∞
Response Time	0	R	√3	1	1	0.00	0.00	∞
Integration Time	1.4	R	√3	1	1	0.81	0.81	∞
RF ambient Conditions - Noise	3.0	R	√3	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	3.0	R	√3	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	1.4	R	√3	1	1	0.81	0.81	∞
Probe positioning with respect to Phantom Shell	1.4	R	√3	1	1	0.81	0.81	∞
Extrapolation, interpolation and integration Algorithms for Max. SAR Evaluation	2.3	R	√3	1	1	1.33	1.33	∞
Test sample Related								
Test sample positioning	2.6	N	1	1	1	2.60	2.60	11
Device Holder Uncertainty	3.0	N	1	1	1	3.00	3.00	7
Output power Variation - SAR drift measurement	5.0	R	√3	1	1	2.89	2.89	∞
SAR scaling	2.0	R	√3	1	1	1.15	1.15	∞
Phantom and Tissue Parameters								
Phantom Shell Uncertainty - Shape,Thickness and Permittivity	4	R	√3	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviation in permittivity and conductivity	2.0	N	1	1	0.84	2.00	1.68	∞
Liquid conductivity measurement	4.0	N	1	0.78	0.71	3.12	2.84	5
Liquid permittivity measurement	5.0	N	1	0.23	0.26	1.15	1.30	5
Liquid Conductivity - Temperature Uncertainty	2.5	R	√3	0.78	0.71	1.13	1.02	∞
Liquid permittivity - Temperature Uncertainty	2.5	R	√3	0.23	0.26	0.33	0.38	∞
Combined Standard Uncertainty		RSS				10.47	10.34	
Expanded Uncertainty (95% Confidence interval)		k				20.95	20.69	

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

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3.4.2 Measurement uncertainly evaluation for system check

Uncertainty Component	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10 g)	1g Ui (+-%)	10 g Ui (+-%)	Vi veff
Measurement System								
Probe calibration	5.8	N	1	1	1	5.80	5.80	∞
Axial Isotropy	3.5	R	√3	1	1	2.02	2.02	∞
Hemispherical Isotropy	5.9	R	√3	0	0	0.00	0.00	∞
Boundary effect	1	R	√3	1	1	0.58	0.58	∞
Linearity	4.7	R	√3	1	1	2.71	2.71	∞
System detection limits	1	R	√3	1	1	0.58	0.58	∞
Modulation response	0	N	√3	0	0	0.00	0.00	∞
Readout Electronics	0.5	N	1	1	1	0.50	0.50	∞
Response Time	0	R	√3	0	0	0.00	0.00	∞
Integration Time	1.4	R	√3	0	0	0.00	0.00	∞
RF ambient Conditions - Noise	3	R	√3	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	3	R	√3	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	1.4	R	√3	1	1	0.81	0.81	∞
Probe positioning with respect to Phantom Shell	1.4	R	√3	1	1	0.81	0.81	∞
Extrapolation, interpolation and integration Algorithms for Max. SAR Evaluation	2.3	R	√3	1	1	1.33	1.33	∞
Dipole								
Deviation of experimental source from numerical source	5	N	1	1	1	5.00	5.00	∞
Input Power and SAR driftmeasurement	0.5	R	√3	1	1	0.29	0.29	∞
Dipole Axis to Liquid Dist.	2.0	R	√3	1	1	1.15	1.15	∞
Phantom and Tissue Parameters								
Phantom Shell Uncertainty - Shape,Thickness and Permittivity	4	R	√3	1	1	2.31	2.31	∞
Uncertainty in SAR correction for deviation in permittivity and conductivity	2.0	N	1	1	0.84	2.00	1.68	∞
Liquid conductivity measurement	4	N	1	0.78	0.71	3.12	2.84	5
Liquid permittivity measurement	5.0	N	1	0.23	0.26	1.15	1.30	5
Liquid Conductivity - Temperature Uncertainty	2.5	R	√3	0.78	0.71	1.13	1.02	∞
Liquid permittivity - Temperature Uncertainty	2.5	R	√3	0.23	0.26	0.33	0.38	∞
Combined Standard Uncertainty		RSS				10.16	10.03	
Expanded Uncertainty (95% Confidence interval)		k				20.32	20.06	

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4. Measurement System

4.1 Specific Absorption Rate (SAR) Definition

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:

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

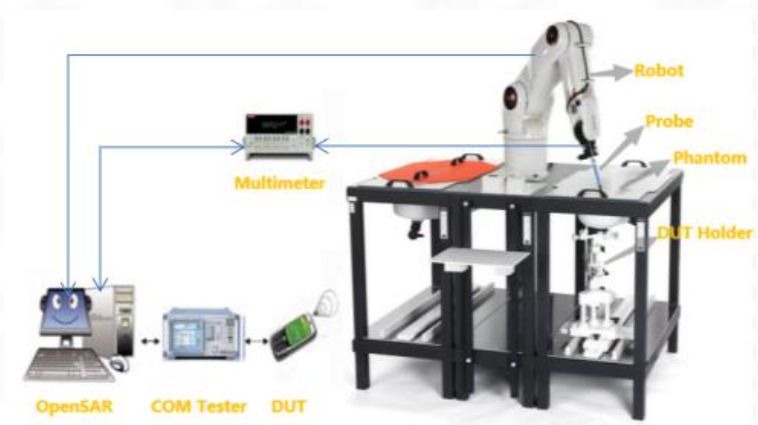
SAR is expressed in units of Watts per kilogram (W/kg) SAR measurement can be related to the electrical field in the tissue by

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

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

4.2 MVG SAR System

4.2.1 SAR system diagram



4.2.2 Robot

A standard high precision 6-axis robot (Denso) with teaches pendant with Scanning System
· It must be able to scan all the volume of the phantom to evaluate the tridimensional distribution of SAR.
· Must be able to set the probe orthogonal of the surface of the phantom (±30°).
· Detects stresses on the probe and stop itself if necessary to keep the integrity of the probe.

4.2.3 E-Field Probe

For the measurements, the Specific Dosimetric SSE2 E-Field Probe with following specifications is used:

- Dynamic range: 0.01-100 W/kg
- Tip diameter: 2mm for SSE2
- Distance between probe tip and sensor centre: 1mm for SSE2
- Distance between sensor centre and the inner phantom surface: 2mm for f>=4GHz.
- Probe linearity: <0.25dB.
- Axial Isotropy: <0.25dB.
- Spherical Isotropy: <0.50dB.
- Calibration range: 150 to 6000 MHz for head & body simulating liquid
- Angle between probe axis (evaluation axis) and surface normal line: less than 20°.

4.2.4 Phantoms

SAM Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The probe scanning of the E-Field is done in the 2 halves of the normalized head. The normalized shape of the phantom corresponds to the dimensions of 90% of an adult head size. It enables the dosimetric evaluation of left and right-hand phone usage and includes an additional flat phantom part for the simplified body performance check.The phantom set-up includes a cover, which prevents the evaporation of the liquid.

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SAM Phantom

The thickness of the phantom amounts to 2 mm±0.2 mm. The materials for the phantom do not affect the radiation of the device under test (DUT) : εr' <5
The head is filled with tissue simulating liquid. The hand do not have to be modeled.

TWIN SAM phantom			
	Mechanical	Electrical	
Overall thickness	2±0.2 mm(except ear area)	Relative permittivity	3.4
Dimensions	1000 mm(L) x 500 mm(W) x 200 mm(H)	Loss tangent	0.02
Maximum volume	27 L		
Material	Fiberglass based		

ELLIPTICAL Phantom

The phantom is for Body performance check filled with tissue-equivalent liquid to a depth of at least 150 mm, whose shell material is resistant to damage or reaction with tissue-equivalent liquid chemicals.

ELLI Phantom

The shape of the phantom is an ellipse with length 600mm±5mm and width 400mm±5mm.
The phantom shell is made of low-loss and low-permittivity material, having loss tangent tanδ ≤ 0.05 and relative permittivity:
εr' ≤ 5 for f ≤ 3 GHz
3 ≤εr' ≤ 5 for f > 3 GHz
The thickness of the bottom-wall of the flat phantom is 2.0 mm with a tolerance of ± 0.2 mm.

Technical & mechanical characteristics	
Shell thickness	2 mm ± 0.2 mm
Filling volume	25 L
Dimensions	600 mm x 400 mm x 200mm
Permittivity	4.4
Loss tangent	0.017

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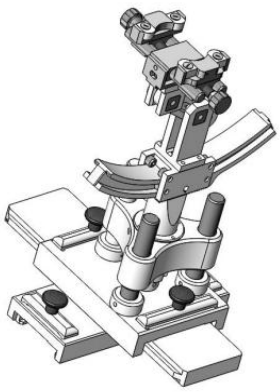
4.2.5 Device Holder



System Material	Permittivity	Loss tangent
Delrin	3.7	0.005

(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°.)

System Material	Permittivity	Loss tangent
PMMA	2.9	0.028

4.2.6 Simulating Liquid

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%.

Head Liquid Depth	Body Liquid Depth

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The following table gives the recipes for tissue simulating liquid and the theoretical Conductivity/Permittivity.

Head (Reference IEEE1528)								
Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity σ (S/m)	Permittivity ε
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.4	40.0
2450	55.0	0	0	0.1	0	44.9	1.80	39.2
2600	54.9	0	0	0.1	0	45.0	1.96	39.0
Frequency (MHz)	Water (%)	Hexyl Carbitol (%)			Triton X-100 (%)		Conductivity σ (S/m)	Permittivity ε
5200	62.52	17.24			17.24		4.66	36.0
5800	62.52	17.24			17.24		5.27	35.3
Body (From instrument manufacturer)								
Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity σ (S/m)	Permittivity ε
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2
900	50.8	48.2	0	0.9	0.1	0	1.05	55.0
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3
2450	68.6	0	0	0.1	0	31.3	1.95	52.7
2600	68.2	0	0	0.1	0	31.7	2.16	52.5
Frequency(MHz)	Water	DGBE (%)			Salt (%)		Conductivity σ (S/m)	Permittivity ε
5200	78.60	21.40			/		5.30	49.00
5800	78.50	21.40			0.1		6.00	48.20

5. System Verification

5.1 Purpose of System Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. The setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

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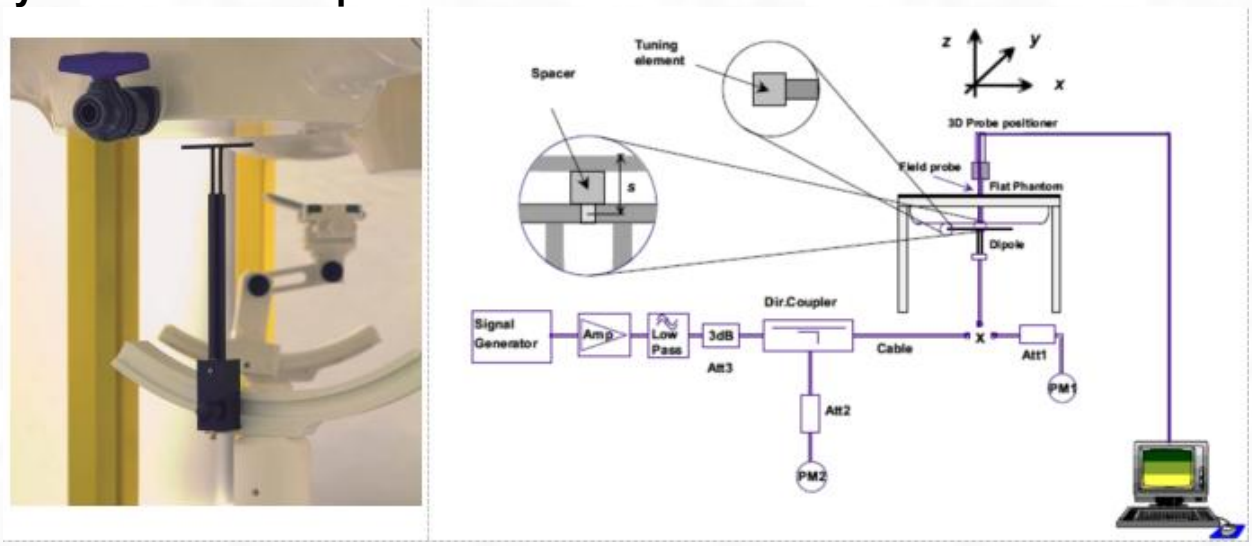
5.2 System Check Setup



6. TEST POSITION CONFIGURATIONS

According to KDB 941225 D07 UMPC Mini Tablet v01r02, small hand-held tablets and devices of similar form factors are tested for SAR compliance in use configurations described in the following subsections.

6.1 UMPC test position

The test procedures are applicable to devices with a display and overall diagonal dimension ≤ 20 cm (~7.9”). These devices are typically operated like a mini-tablet and are usually designed with certain UMPC features and operating characteristics; therefore, the term “UMPC Mini-Tablet” is used to identify the SAR test requirements for this category of devices. A composite test separation distance of 5 mm is applied to test UMPC mini-tablet transmitters and to maintain RF exposure conservativeness for the interactive operations associated with this type of devices.
UMPC mini-tablet devices must be tested for 1-g SAR on all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge, at 5 mm separation from a flat phantom, for the data modes, wireless technologies and frequency bands supported by the device to determine SAR compliance. When 1-g SAR is tested at 5 mm, 10-g SAR is not required.

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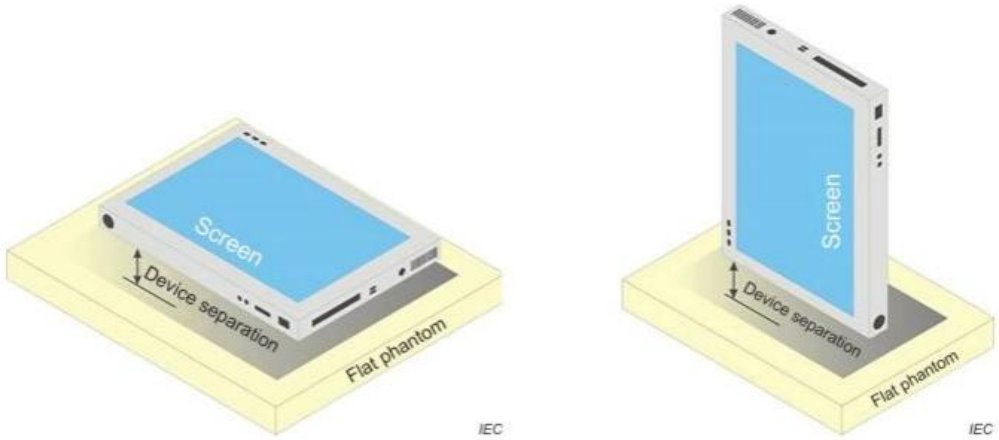

a) Tablet form factor portable computer

6.2 Product Specific 10g Exposure Consideration

According with 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, unless it is confirmed otherwise through KDB inquiries, the following phablet procedures should be applied to evaluate SAR compliance for each applicable wireless modes and frequency band. Devices marketed as phablets, regardless of form factors and operating characteristics must be tested as a phablet to determine SAR compliance;

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 10-g extremity 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, 10-g extremity SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg.

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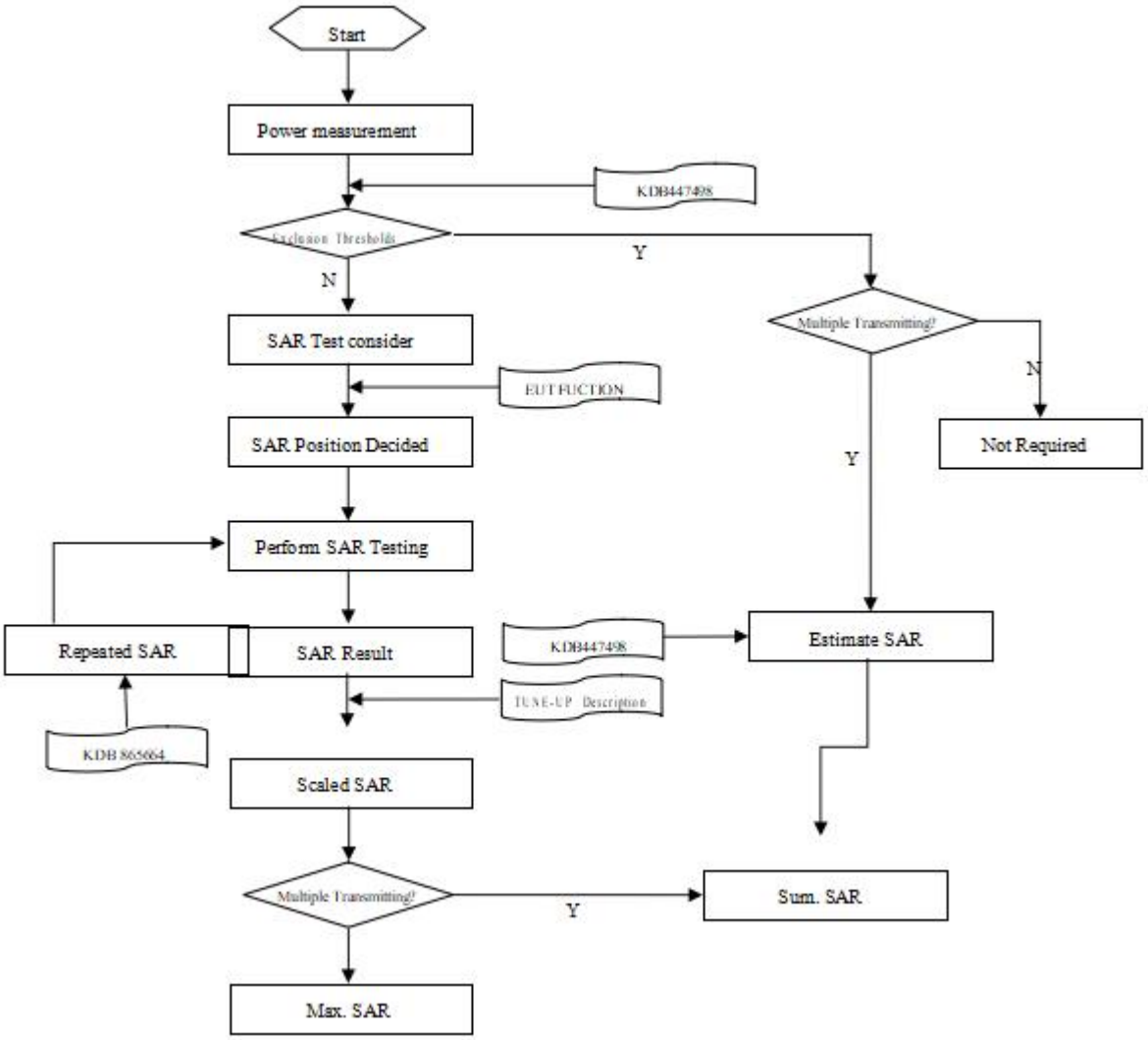
7. Measurement Procedure

7.1 Measurement Process Diagram

Body SAR



7.2 SAR Scan General Requirement

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1 g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEC/IEEE 62209-1528: 2020.

Table 3 – Area scan parameters

Parameter	DUT transmit frequency being tested	
	$f \leq 3$ GHz	3 GHz < $f \leq 10$ GHz
Maximum distance between the measured points (geometric centre of the sensors) and the inner phantom surface (z_{M1} in Figure 20 in mm)	5 ± 1	$\delta \ln(2)/2 \pm 0{,}5$ [a]
Maximum spacing between adjacent measured points in mm (see O.8.3.1)[b]	20, or half of the corresponding zoom scan length, whichever is smaller	$60/f$, or half of the corresponding zoom scan length, whichever is smaller
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20)[c]	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Tolerance in the probe angle	1°	1°

[a] δ is the penetration depth for a plane-wave incident normally on a planar half-space.

[b] See Clause O.8 on how Δx and Δy may be selected for individual area scan requirements.

[c] The probe angle relative to the phantom surface normal is restricted due to the degradation in the measurement accuracy in fields with steep spatial gradients. The measurement accuracy decreases with increasing probe angle and increasing frequency. This is the reason for the tighter probe angle restriction at frequencies above 3 GHz.

Table 4 – Zoom scan parameters

Parameter	DUT transmit frequency being tested	
	$f \leq 3$ GHz	3 GHz < $f \leq 10$ GHz
Maximum distance between the closest measured points and the phantom surface (z_{M1} in Figure 20 and Table 3, in mm)	5	$\delta \ln(2)/2$ [a]
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20)	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Maximum spacing between measured points in the x- and y-directions (Δx and Δy, in mm)	8	$24/f$ [b]
For uniform grids: Maximum spacing between measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	5	$10/(f - 1)$
For graded grids: Maximum spacing between the two closest measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	4	$12/f$
For graded grids: Maximum incremental increase in the spacing between measured points in the direction normal to the phantom shell ($R_z = \Delta z_2/\Delta z_1$ in Figure 20)	1,5	1,5
Minimum edge length of the zoom scan volume in the x- and y-directions (L_z in O.8.3.2, in mm)	30	22
Minimum edge length of the zoom scan volume in the direction normal to the phantom shell (L_h in O.8.3.2 in mm)	30	22
Tolerance in the probe angle	1°	1°

[a] δ is the penetration depth for a plane-wave incident normally on a planar half-space.

[b] This is the maximum spacing allowed, which might not work for all circumstances.

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7.3 Measurement Procedure

The following steps are used for each test position

a. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface

b. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.

c. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to16 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.

d. 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.

7.4 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. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r04 quoted below.

When the 1 g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.

8. Conducted RF Output Power

2.4G FHSS

Mode	Channel	Frequency(MHz)	Avg. Power(dBm)	Maximum Tune-up(dBm)
802.11ah MHz	1	905	24.83	25.00
	3	909	25.59	26.00
	5	913	**27.97**	**28.00**
	7	917	27.53	28.00
	9	921	24.76	25.00

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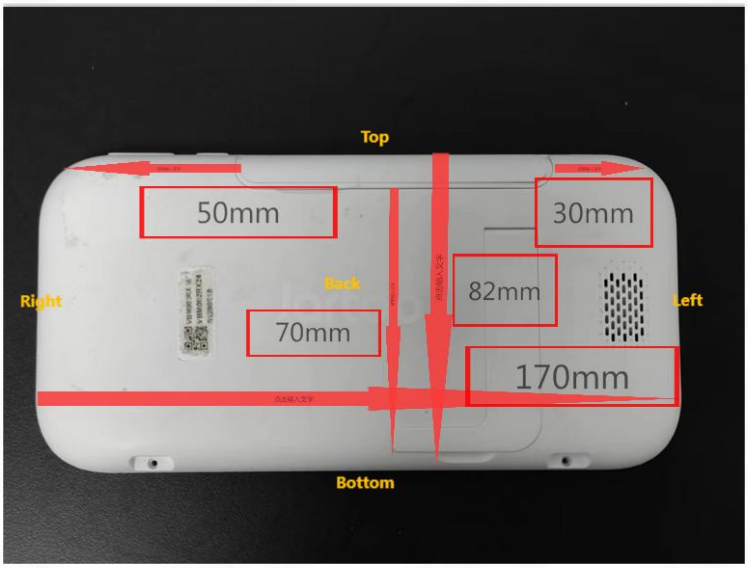
9. Test Exclusion Consideration

Antenna information:



802.11ah WIFI module Antenna	802.11ah WIFI module TX/RX
Note: 1. KDB 941225 D07 UMPC Mini Tablet v01r02, UMPC mini-tablet devices must be tested for 1-g SAR on all surfaces and side edges with a transmitting antenna located at ≤ 25 mm from that surface or edge, at 5 mm separation from a flat phantom, for the data modes, wireless technologies and frequency bands supported by the device to determine SAR compliance.	

Distance of The Antenna to the EUT surface and edge (mm)						
Antenna	Front Side (mm)	Back Side (mm)	Left Edge (mm)	Right Edge (mm)	Top Edge (mm)	Bottom Edge (mm)
Wifi	<25	<25	30	50	<25	70

Positions for SAR tests						
Antenna	Front Side (mm)	Back Side (mm)	Left Edge (mm)	Right Edge (mm)	Top Edge (mm)	Bottom Edge (mm)
Wifi	Yes	Yes	No	No	Yes	No

9.1 SAR Test Exclusion Consideration Table

Per KDB 447498 requires when the standalone SAR test exclusion of section 4.3.1 is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to the following format to determine simultaneous transmission SAR test exclusion:

(max.power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] · [√f(GHz) / x] W/kg for test separation distances ≤ 50 mm;
where x = 7.5 for 1-g SAR, and x= 18.75 for 10-g SAR.
0.4 W/Kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

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10. Test Result

Body													
Mode	Position	Dist. (mm)	Ch.	Freq. (MHz)	Power Drift (%)	1g Meas. SAR (W/kg)	Duty cycle (%)	Duty cycle Factor	Meas. Power (dBm)	Max. tune-up power (dBm)	Scaling Factor	1g Scaled SAR (W/kg)	Meas. No.
802.11ah MHz	Front	0	5	913.0	-0.200	0.026	100.00	1.000	27.97	28.00	1.007	0.026	/
	Back	0	5	913.0	-2.540	0.143	100.00	1.000	27.97	28.00	1.007	**0.144**	1#
	Top	0	5	913.0	-1.550	0.060	100.00	1.000	27.97	28.00	1.007	0.060	/

Note:
1. The maximum SAR Value of each test band is marked bold.
2. SAR plot is provided only for the highest measured SAR in each exposure configuration, wireless mode and frequency band combination.
3. Per KDB 447498 D01 v06, for each exposure position, if the highest output power channel Reported SAR ≤ 0.8W/kg, other channels SAR testing is not necessary.
4. Per KDB 447498 D01 v06, the report SAR is measured SAR value adjusted for maximum tune-up tolerance. Scaling Factor=10^[(tune-up limit power(dBm) - Ave.power power (dBm))/10], where tune-up limit is the maximum rated power among all production units.
   Reported SAR(W/kg)=Measured SAR (W/kg)*Scaling Factor.

11. 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.

SAR repeated measurement procedure:

1. When the highest measured SAR is < 0.80 W/kg, repeated measurement is not required.
2. When the highest measured SAR is >= 0.80 W/kg, repeat that measurement once.
3. 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, perform a second repeated measurement.
4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20, and the original, first or second repeated measurement is >= 1.5 W/kg, perform a third repeated measurement.

Note: For 1g SAR, the highest measured 1g SAR is 0.143 < 0.80 W/kg, repeated measurement is not required.

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12. Simultaneous Transmission

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna. When the sum of SAR 1g of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit (SAR 1g 1.6 W/kg), the simultaneous transmission SAR is not required. When the sum of SAR 1g is greater than the SAR limit (SAR 1g 1.6 W/kg), SAR test exclusion is determined by the SAR to Peak Location Ratio (SPLSR).

12.1 Simultaneous Transmission Mode Considerations

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.
The device only has 1 Tx antenna supporting Zigbee which can’t always transmit simultaneously.
So we don’t need to consider simultaneous transmission.

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13. Test Equipment List

Description	Manufacturer	Model	Serial No./Version	Cal. Date	Cal. Due
E-Field Probe	MVG	SSE2	04/22 EPGO365	2024/02/06	2025/02/05
6 1/2 Digital Multimeter	Keithley	DMM6500	4527164	2023/11/16	2024/11/15
Wideband Radio Communication Tester	ROHDE & SCHWARZ	CMW500	161997	2023/11/16	2024/11/15
MXG Vector Signal Generator	Agilent	N5182A	MY46240163	2023/11/16	2024/11/15
E-Series Avg. Power Sensor	KEYSIGHT	E9300A	MY55050017	2024/03/20	2025/03/19
EPM Series Power Meter	KEYSIGHT	E4418B	MY41293435	2024/03/20	2025/03/19
10dB Attenuator	MIDWEST MICROWAVE	263-10dB	/	2024/03/20	2025/03/19
Coupler	MERRIMAC	CWM-10R-10.8G	LOT-83391	2024/03/20	2025/03/19
835MHz Validation Dipole	MVG	SID835	07/22 DIP 0G835-656	2023/02/06	2025/02/05
LIMESAR Dielectric Probe	MVG	SCLMP	06/22 OCPG88	/	/
ENA Series Network Analyzer	Agilent	E5071B	MY42301221	2023/11/16	2024/11/15
Thermometer	Riters	DT-232	21A11	2024/03/20	2025/03/19
Antenna network emulator	MVG	ANTA 74	07/22 ANTA 74	/	/
SAM Phantom	MVG	SAM	07/22 SAM149	/	/
Mobile Phone Positioning System	MVG	MSH 118	07/22 MSH 118	/	/
Mechanical Calibration Kit	PNA	/	/	/	/
Open SAR test software	MVG	/	V5.3.5	/	/

Note: For dipole antennas, BTF has adopted 3 years as calibration intervals, and on annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

1. There is no physical damage on the dipole;
2. System validation with specific dipole is within 10% of calibrated value;
3. Return-loss in within 20% of calibrated measurement.
4. Impedance (real or imaginary parts) in within 5 Ohms of calibrated measurement.

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ANNEX A Simulating Liquid Verification Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an SCLMP Dielectric Probe Kit.

Dielectric performance of tissue simulating liquid									
Frequency (MHz)	εr		σ(s/m)		Delta (εr)	Delta (σ)	Limit	Temp (℃)	Date
	Target	Measured	Target	Measured					
835	41.50	41.41	0.90	0.87	0.22%	3.33%	±5%	20.0	7/5/2024
NOTE: The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 ℃ of the conditions expected during the SAR evaluation to satisfy protocol requirements.									

ANNEX B System Check Result

Comparing to the original SAR value provided by MVG, the validation data should be within its specification of 10 % (for 10 g).

Frequency (MHz)	Input Power (mW)	10g SAR (W/Kg)	1g SAR (W/Kg)	10g SAR 1W input power normalized (W/Kg)	1g SAR 1W input power normalized (W/Kg)	10g SAR Standard target (1W) (W/Kg)	1g SAR Standard target (1W) (W/Kg)	10g SAR Deviation	1g SAR Deviation
835	16	0.106	0.163	6.68	10.28	6.22	9.56	-7.40%	-7.53%

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System Performance Check Data (835 MHz)

System check at 835 MHz

Date of measurement: 7/5/2024

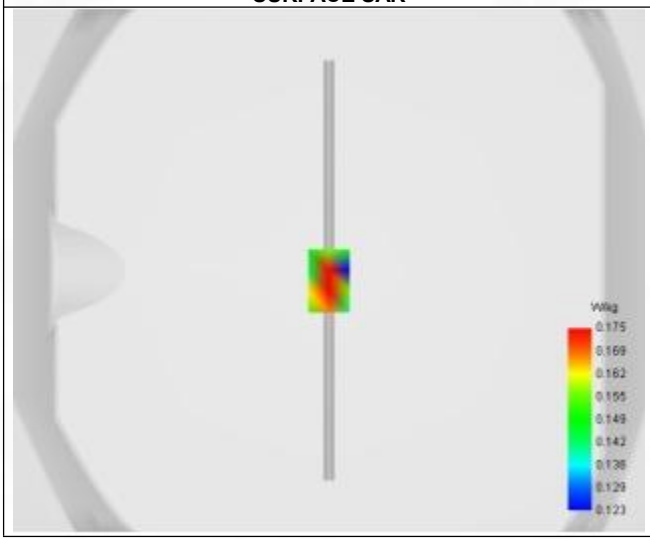
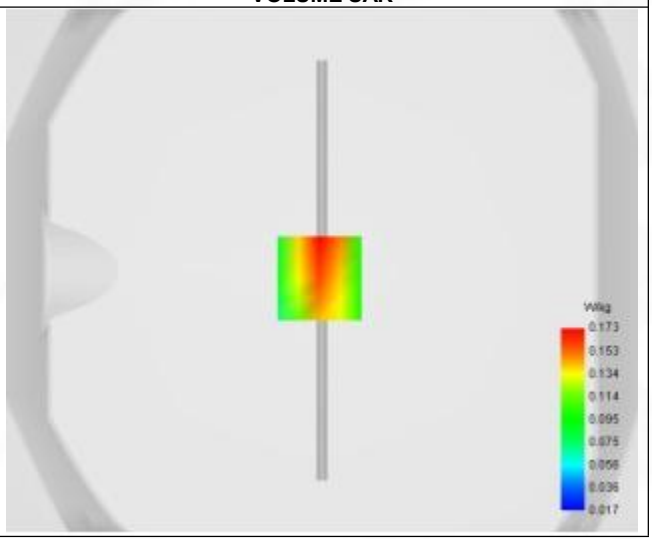
A. Experimental conditions.

Probe	SN 04/22 EPGO365
ConvF	1.68
Area Scan	dx=8mm dy=8mm, Adaptative 1 max
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Dipole
Band	CW835
Channels	Middle
Signal	CW

B. Permitivity

Frequency (MHz)	835.000
Relative permitivity (real part)	41.410
Relative permitivity (imaginary part)	19.490
Conductivity (S/m)	0.870

C. SAR Surface and Volume

SURFACE SAR	VOLUME SAR
	

Maximum location: X=-1.00, Y=-3.00 ; SAR Peak: 0.26 W/kg

D. SAR 1g & 10g

SAR 10g (W/Kg)	0.106
SAR 1g (W/Kg)	0.163
Variation (%)	-3.390
Horizontal validation criteria: minimum distance (mm)	8.396
Vertical validation criteria: SAR ratio M2/M1 (%)	66.47%

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	0.059	0.173	0.115	0.061	0.072

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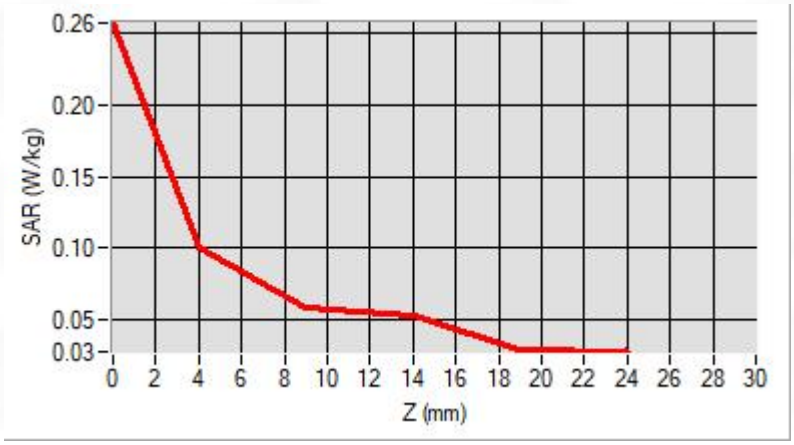
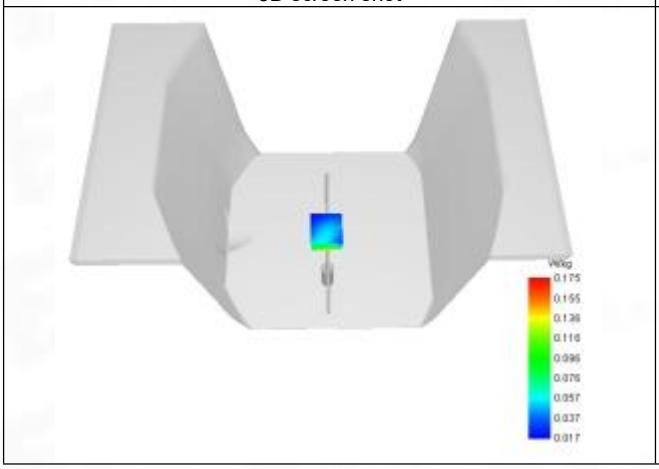
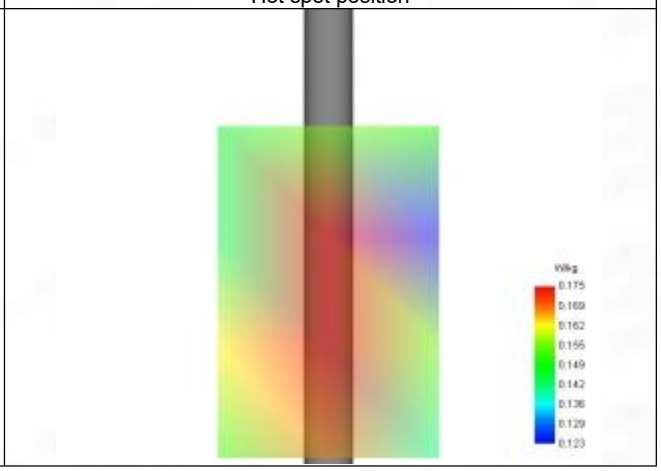


F. 3D Image

3D screen shot	Hot spot position
	

ANNEX C Test Data

1-Body with back position in dist. 0 mm on Channel 5 in 802.11ah WIFI

SAR Measurement at Channel 5 (Body, Validation Plane)

Date of measurement: 7/5/2024

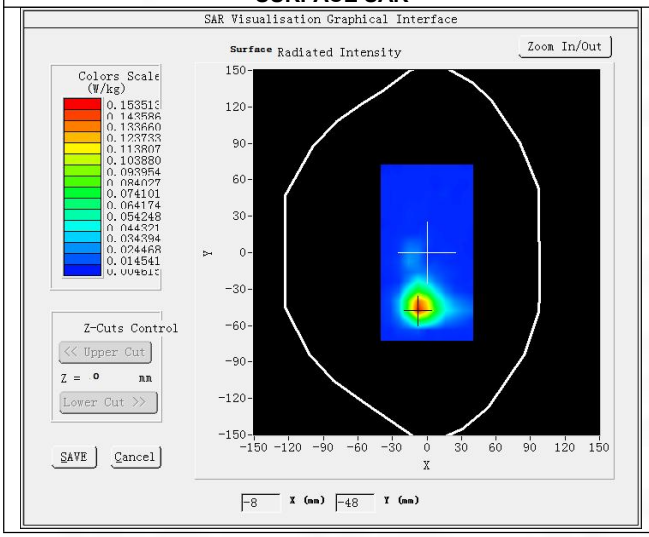
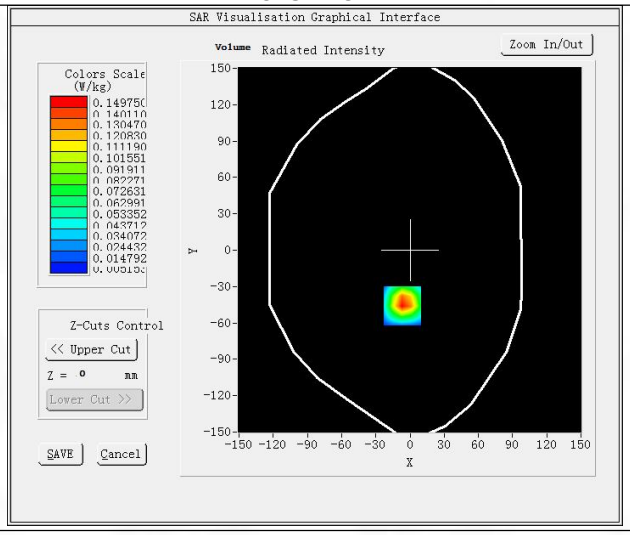
A. Experimental conditions.

Probe	SN 04/22 EPGO365
ConvF	1.68
Area Scan	dx=8mm dy=8mm, Adaptative 1 max
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete
Phantom	Validation plane
Device Position	Body
Band	5
Channels	Middle
Signal	/

B. Permitivity

Frequency (MHz)	913.000
Relative permitivity (real part)	41.289
Relative permitivity (imaginary part)	19.054
Conductivity (S/m)	0.910

C. SAR Surface and Volume

SURFACE SAR	VOLUME SAR
	

Maximum location: X=-7.00, Y=-46.00 SAR Peak: 0.31 W/kg

D. SAR 1g & 10g

SAR 10g (W/Kg)	0.061
SAR 1g (W/Kg)	0.143
Variation (%)	-2.540
Horizontal validation criteria: minimum distance (mm)	8.957
Vertical validation criteria: SAR ratio M2/M1 (%)	36.91%

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	0.3008	0.149	0.055	0.021	0.010

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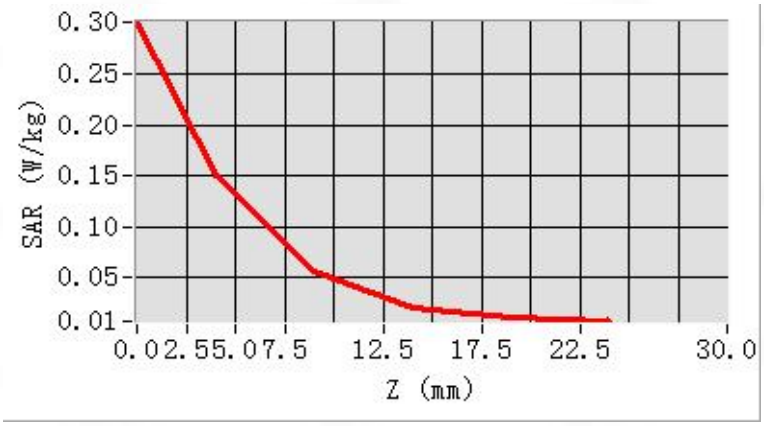
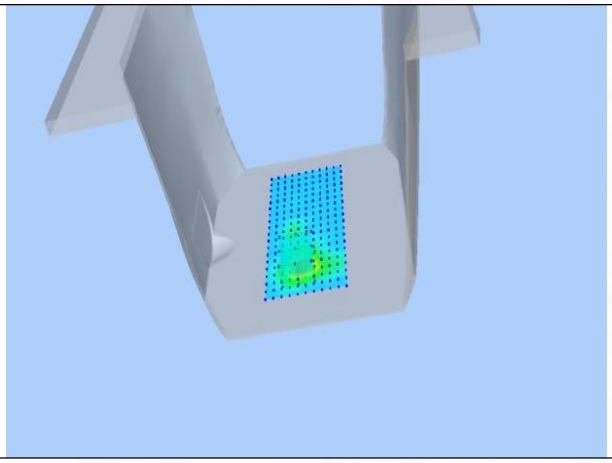
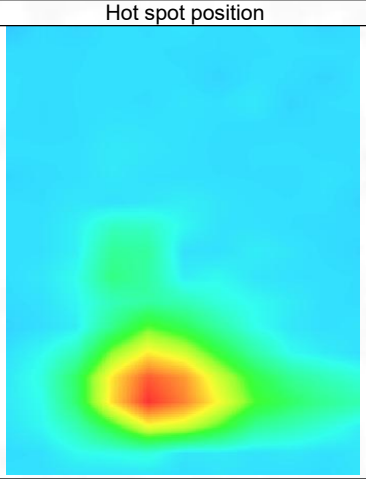


F. 3D Image

3D screen shot	Hot spot position
	

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ANNEX D SAR Test Setup Photos

Reference Photo: simulation liquid depth 15cm	
Test positions	
Front (gap 0mm)	Back (gap 0mm)
Top (gap mm)	

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ANNEX E EUT External and Internal Photos

Please refer to RF Report.

ANNEX F Calibration Information

Please refer to the document “Calibration.pdf”.

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