TEST REPORT

Report No.:	BCTC2505450182E
Applicant:	Shenzhen Donghuaxing Technology Co., Ltd
Product Name:	mobile phone
Test Model:	i16 Pro
Tested Date:	2025-05-15 to 2025-05-27
Issued Date:	2025-05-27

Shenzhen BCTC Testing Co., Ltd.

FCC ID: 2BGA8-PHONE02

Product Name:	mobile phone
Trademark:	SERVO
Model/Type Reference:	i16 Pro i17 mini, A50 PRO, A70 PRO, i19 ROTATE, Flip6, Pocket S1, N95 PRO, Flilo9, Ultra 700, AUAR11, R18 PRO, i16 PRO MAX, R25 PRO, i18 mini, i19 mini, i17 Ultra, i16 Ultra
Prepared For:	Shenzhen Donghuaxing Technology Co., Ltd
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Manufacturer:	Shenzhen Donghuaxing Technology Co., Ltd
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Prepared By:	Shenzhen BCTC Testing Co., Ltd.
Address:	1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China
Sample Received Date:	2025-05-06
Sample tested Date:	2025-05-15 to 2025-05-27
Issue Date:	2025-05-27
Test Standards:	IEEE Std C95.1-2019 IEEE Std 1528-2013 FCC Part 2.1093
Test Results:	PASS
Remark:	This is SAR test report

Tested by:

Min Zhi Cheng / Project Handler

Approved by:

Zero Zhou / Reviewer

The test report is effective only with both signature and specialized stamp. This result(s) shown in this report refer only to the sample(s) tested. Without written approval of Shenzhen BCTC Testing Co., Ltd, this report can't be reproduced except in full. The tested sample(s) and the sample information are provided by the client.

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(Note: N/A Means Not Applicable)

1. Version

Report No.	Issue Date	Description	Approved
BCTC2505450182E	2025-05-27	Original	Valid

2. Test Standards

IEEE Std C95.1-2019: IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz. It specifies the maximum exposure limit of 1.6 W/kg as averaged over any 1 gram of tissue for portable devices being used within 20 cm of the user in the uncontrolled environment.
IEEE Std 1528-2013: IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.
FCC Part 2.1093 Radiofrequency Radiation Exposure Evaluation: Portable Devices
KDB 447498 D01 General RF Exposure Guidance v06: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies
KDB 865664 D01 SAR Measurement 100MHz to 6GHz v01r04: SAR Measurement Requirements for 100MHz to 6GHz
KDB 865664 D02 RF Exposure Reporting v01r02: RF Exposure Compliance Reporting and Documentation Considerations
KDB 941225 D01 3G SAR Procedures: 3G SAR MEAUREMENT PROCEDURES
KDB 648474 D04 Handset SAR v01r03: SAR EVALUATION CONSIDERATIONS FOR WIRELESS HANDSETS

3. Test Summary

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

Frequency Band	Maximum SAR_{1g} (W/kg)		Limit SAR_{1g} (W/kg)
	Head	Body (5mm)	
Bluetooth	0.053	0.053	2.0
GSM 850	0.471	0.539	2.0
GSM 1900	0.577	0.472	2.0
Simultaneous Transmission	0.630	0.592	2.0

The device in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2019, and had been tested in accordance with the measurement methods and procedure specified in IEEE 1528-2013.

4. SAR Limits

FCC Limit (1g Tissue)

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1g of tissue)	1.6	8.0
Spatial Peak (hands/wrists/feet/anklesaveraged over 10g)	4.0	20.0

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.
Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

5. 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 and the measured 10-g SAR within a frequency band is <3.75 W/kg. The expanded SAR measurement uncertainty must be ≤ 30%, for a confidence interval of k=2. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.

6. Product Information and Test Setup

6.1 Product Information

Model/Type reference:	i16 Pro i17 mini, A50 PRO, A70 PRO, i19 ROTATE, Flip6, Pocket S1, N95 PRO, Flilo9, Ultra 700, AUAR11, R18 PRO, i16 PRO MAX, R25 PRO, i18 mini, i19 mini, i17 Ultra, i16 Ultra
Model differences:	All the model are the same circuit and RF module, except model names.
Hardware Version:	T393-V1.2
Software Version:	T393_JHD_X27_HCL_I16PRO_V106_250307
Ratings:	DC 5V from adapter DC 3.7V from battery
Sample Number:	250594969
Operation Frequency:	2402-2480MHz
Type of Modulation:	GFSK, π/ 4 DQPSK, 8DPSK
Number Of Channel	79CH
Antenna installation:	Internal antenna
Antenna Gain:	1.80dBi Remark: ☐ The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information. ☒ The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

Operation Frequency:	GSM/GPRS/EGPRS 850: TX: 824~849MHz; RX: 869~894MHz; GSM/GPRS/EGPRS 1900: TX:1850~1910MHz; RX:1930~1990MHz;
GPRS Class:	Class 12
Antenna installation:	Internal antenna
Antenna Gain:	GSM850: 0.5dBi GSM1900: 1.2dBi Remark: ☐ The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information. ☒ The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

6.2 Test Setup Configuration

See test photographs attached in EUT TEST SETUP PHOTOGRAPHS for the actual connections between Product and support equipment.

6.3 Support Equipment

Cable of Product

No.	Cable Type	Quantity	Provider	Length (m)	Shielded	Note
1	--	--	Applicant	---	Yes/No	--
2	--	--	BCTC	--	Yes/No	--

No.	Device Type	Brand	Model	Series No.	Note
1.	---	---	---	---	---
2.	--	--	--	--	--

Notes:
1. All the equipment/cables were placed in the worst-case configuration to maximize the emission during the test.
2. Grounding was established in accordance with the manufacturer's requirements and conditions for the intended use.

6.4 Test Environment

1. Normal Test Conditions:

Humidity(%):	35-75
Atmospheric Pressure(kPa):	95-105
Temperature(℃):	18-25

2. Extreme Test Conditions:
N/A

7. Test Facility and Test Instrument Used

7.1 Test Facility

All measurement facilities used to collect the measurement data are located at Shenzhen BCTC Testing Co., Ltd. Address: 1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China. The site and apparatus are constructed in conformance with the requirements of ANSI C63.4 and CISPR 16-1-1 other equivalent standards.

FCC Test Firm Registration Number: 712850
A2LA certificate registration number is: CN1212
ISED Registered No.: 23583
ISED CAB identifier: CN0017

7.2 Test Instrument Used

Equipment	Manufacturer	Model#	Serial#	Last Cal.	Next Cal.
PC	DELL	\	\	N/A	N/A
SAR Measurement system	SATIMO	\	\	N/A	N/A
Signal Generator	Keysight	83711B	US37100131	May 14, 2025	May 13, 2026
Multimeter	Keithley	1160271	\	Nov. 10, 2024	Nov 09, 2025
S-parameter Network Analyzer	R&S	ZVB 8	101353	Dec. 07, 2024	Dec. 06, 2025
Communication test set	R&S	CMW500	126173	Nov. 11. 2024	Nov. 10, 2025
E SAR PROBE 6GHz	MVG	SSE2	2623-EPGO-420	July 18, 2024	July 17, 2025
DIPOLE 835	SATIMO	SID 835	SN 47/21 DIP 0G835-621	Nov. 25, 2024	Nov. 24, 2027
DIPOLE 1900	SATIMO	SID 1900	SN 47/21 DIP 1G900-624	Nov. 25, 2024	Nov. 24, 2027
COMOSAR OPEN Coaxial Probe	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
SAR Locator	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
Communication Antenna	SATIMO	\	\	Nov. 18, 2024	Nov. 17, 2025
FEATURE PHONEPOSITIONING DEVICE	SATIMO	\	\	N/A	N/A
DUMMY PROBE	SATIMO	\	\	N/A	N/A
SAM Phantom	MVG	\	SN 13/09 SAM68	N/A	N/A
Liquid measurement Kit	HP	85033D	3423A08186	N/A	N/A
Power meter	Keysight	E4419	A00065	May 14, 2025	May 13, 2026
Power sensor	Keysight	E9300A	US39211659	May 14, 2025	May 13, 2026
Power sensor	Keysight	E9300A	US39211305	May 14, 2025	May 13, 2026
Directional Coupler	Krytar 158020	131467	\	Nov. 10, 2024	Nov 09, 2025
Thermometer	BTE	\	\	Dec. 02, 2024	Dec. 01, 2025
Broad Band Tissue Simulation Liquid	Schmid	\	\	N/A	N/A
Attenuator	Talent Microwave	AT3A10-1.85 -65C	\	May 14, 2025	May 13, 2026
Attenuator	Talent Microwave	AT3A10-1.85 -65C	\	May 14, 2025	May 13, 2026
Attenuator	Talent Microwave	AT3A10-1.85 -65C	\	May 14, 2025	May 13, 2026

Note:
Per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three year extended calibration interval. Each measured dipole is expected to evalute with following criteria at least on annual interval.

1. There is no physical damage on the dipole;
2. System check with specific dipole is within 10% of calibrated values;
3. The most recent return-loss results, measued at least annually, deviates by no more than 20% from the previous measurement;
4. The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the provious measurement.

8. Specific Absorption Rate (SAR)

8.1 Introduction

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 techiques 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.

8.2 SAR Definition

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 either related to the temperature elevation in tissue by

$$\mathbf{SAR} = \mathbf{C}\left(\frac{\boldsymbol{\delta}\mathbf{T}}{\boldsymbol{\delta}\mathbf{t}}\right)$$

Where: C is the specific heat capacity, δ T is the temperature rise and δ t is the exposure duration, or 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.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

9. SAR Measurement System

9.1 The Measurement System

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:
- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

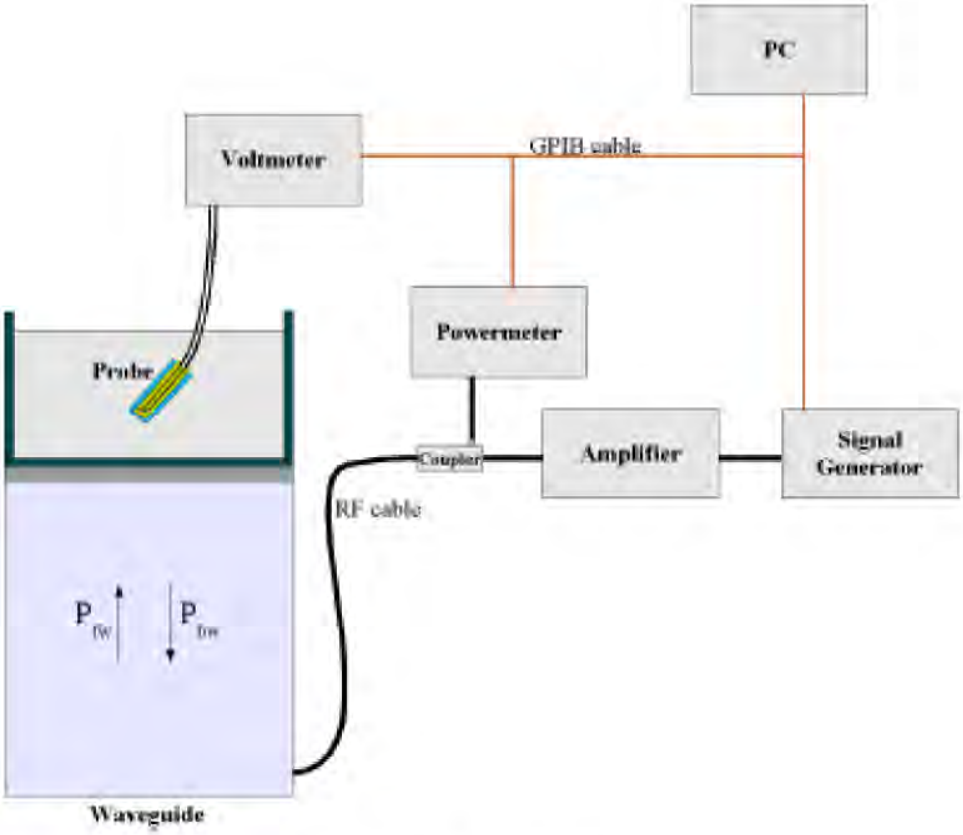
The following figure shows the system.

The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

9.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SN 26/23 EPGO420 with following specifications is used
- Dynamic range: 0.01-100W/kg
- Tip Diameter: 5mm
- Distance between probe tip and sensor center: 2.10mm
- Distance between sensor center and the inner phantom surface: 4mm (repeatability better than +/- 1mm)
- Probe linearity: ＜0.25 dB
- Axial Isotropy: ＜0.25 dB
- Spherical Isotropy: ＜0.50 dB
- Calibration range: 835 to 2500MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and surface normal line:1ess than 30°
Probe calibration is realized, in compliance with EN 62209-1 and IEEE 1528 STD, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 62209-1 annex technique using reference guide at the five frequencies.



$$SAR = \frac{4(p_{fw} - p_{Pbw})}{ab\delta} cos^2 \left(\pi \frac{y}{a}\right) c^{(2\pi/\delta)}$$

Where :
Pfw = Forward Power
Pbw = Backward Power
a and b =Waveguide dimensions
I = Skin depth

Keithley configuration:
Rate = Medium; Filter = ON; RDGS = 10; Filter type = Moving Average; Range auto after each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors, CF(N), for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

CF(N)=SAR(N)/Vlin(N) (N=1,2,3)

The linearised output voltage Vlin(N) is obtained from the displayed output voltage V(N) using

Vlin(N)=V(N)*(1+V(N)/DCP(N)) (N=1,2,3)

where DCP is the diode compression point in mV.

9.3 Probe Calibration Process

Dosimetric Assessment Procedure
Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm2) using an with CALISAR, Antenna proprietary calibration system.

Free Space Assessment Procedure
The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1mW/cm2.

Temperature Assessment Procedure
E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$SAR = C\frac{\Delta T}{\Delta t}$$

Where:
Δt = exposure time (30 seconds),
C = heat capacity of tissue (brain or muscle),
ΔT = temperature increase due to RF exposure.

SAR is proportional to ΔT/Δt, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

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

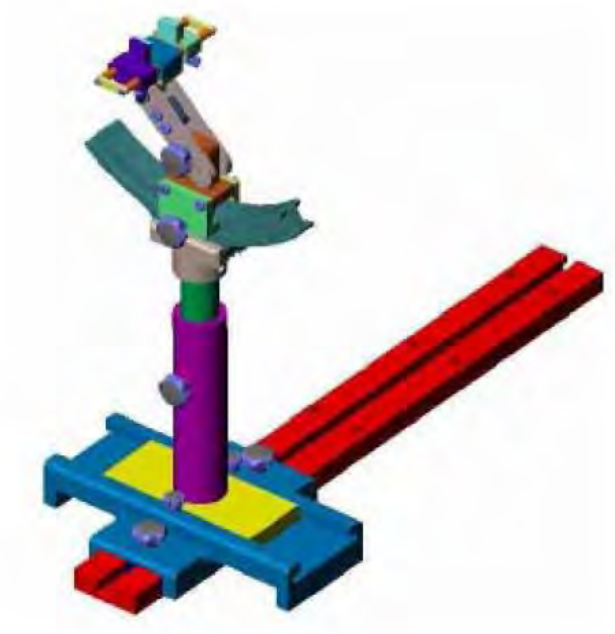
Where:
σ = simulated tissue conductivity,
ρ = Tissue density (1.25 g/cm3 for brain tissue)

9.4 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

9.5 Device Holder

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



System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

10. Tissue Simulating Liquids

10.1 Composition of Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with SMTIMO, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. 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. Please see the following photos for the liquid height.

Liquid Height for Body SAR

The Composition of Tissue Simulating Liquid

Frequency (MHz)	Water (%)	Salt (%)	1,2-Propane diol (%)	HEC (%)	Preventol (%)	DGBE (%)
Head/Body						
835	40.3	1.4	57.9	0.2	0.2	0
900	40.3	1.4	57.9	0.2	0.2	0
1800-2000	55.2	0.3	0	0	0	44.5
2450	55.0	0.1	0	0	0	44.9
2600	54.9	0.1	0	0	0	45.0

Frequency (MHz)	Water (%)	Hexyl Carbitol (%)	Triton X-100 (%)
Head/Body			
5000-6000	65.52	17.24	17.24

10.2 Limit

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters

computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Target Frequency (MHz)	Head	
	Conductivity (σ)	Permittivity (ε_r)
150	0.76	52.3
300	0.87	45.3
450	0.87	43.5
750	0.89	41.9
835	0.90	41.5
900	0.97	41.5
915	0.98	41.5
1450	1.20	40.5
1610	1.29	40.3
1800-2000	1.40	40.0
2450	1.80	39.2
2600	1.96	39.0
3000	2.40	38.5
5200	4.66	36.0
5400	4.86	35.8
5600	5.07	35.5
5800	5.27	35.3

10.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an R&S ZVB 8. Dielectric Probe Kit and an Agilent Network Analyzer.

Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

Frequency (MHz)	Liquid	Target (σ)	Target (εr)	Measured (σ)	Measured (εr)	Delta (σ)%	Delta (εr)%	Limit (%)	Air (°C)	Date
835	Head	0.90	41.50	0.905	42.626	0.56	2.71	±5	23.4	19/5/2025
1900	Head	1.40	40.00	1.439	39.970	2.79	-0.08	±5	23.4	19/5/2025

Remark:

1. The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within ±2°C of the temperature when the tissue parameters are characterized.
2. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 - 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

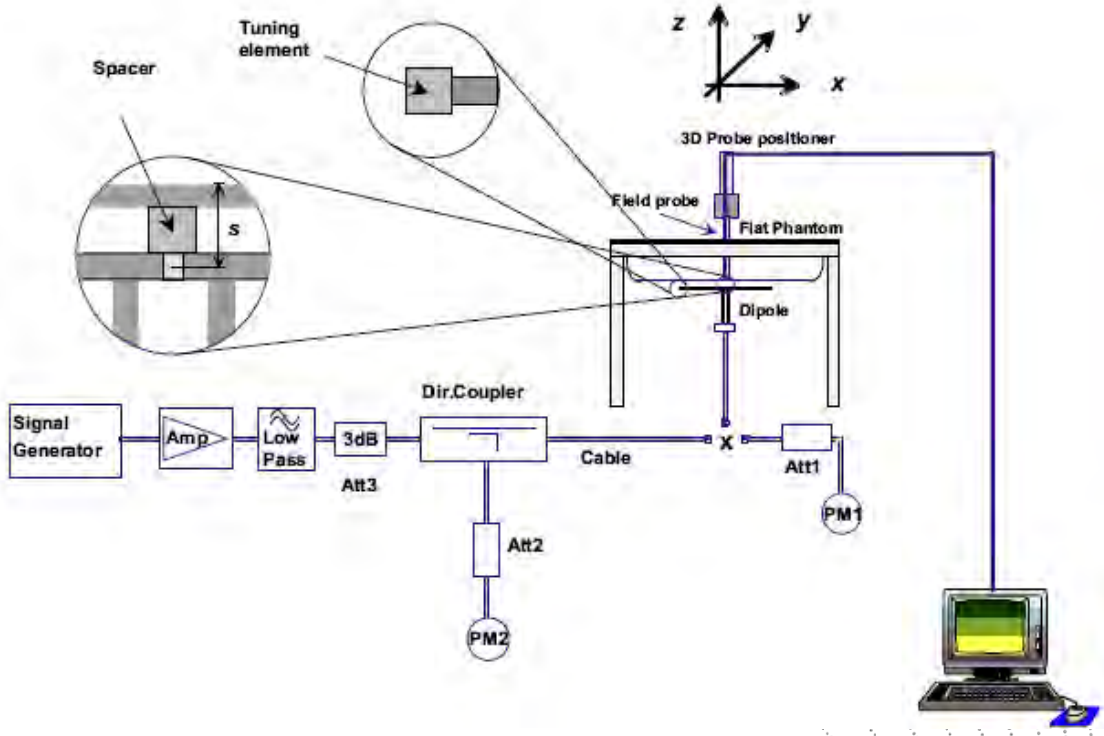
11. System Check

11.1 Purpose of System Performance Check

At the device test frequencies. System check verifies the measurement repeatability of a SAR system before compliance testing and is not a validation of all system specifications. The latter is not required for testing a device but is mandatory before the system is deployed. The system check detects possible short-term drift and unacceptable measurement errors or uncertainties in the system.

11.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 600MHz-6000MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The output power on dipole port must be calibrated to 20 dBm (100 mW) before dipole is connected.



System Verification Setup Block Diagram

Setup Photo of Dipole Antenna

11.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. The following table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion.

Frequency (MHz)	Power	Measured SAR_{1g} (W/Kg)	Normalize to 1 Watt	Measured Drift (%)	1W Target SAR_{1g} (W/Kg)	Difference Percentage (%)	Limit (%)	Liquid (°C)	Date
835	250mW	2.403	9.613	-3.448	10.01	-3.966	±10	23.3	19/5/2025
1900	250mW	10.413	41.652	1.743	41.26	0.950	±10	23.3	19/5/2025

12. EUT Testing Position

12.1 Define Two Imaginary Lines on the Handset

(a) The vertical centerline passes through two points on the front side of the handset - the midpoint of the width wt of the handset at the level of the acoustic output, and the midpoint of the width wb of the bottom of the handset.

(b) The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic
output. The horizontal line is also tangential to the face of the handset at point A.

(c) The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset, especially for clamshell handsets, handsets with flip covers, and other irregularly shaped handsets.

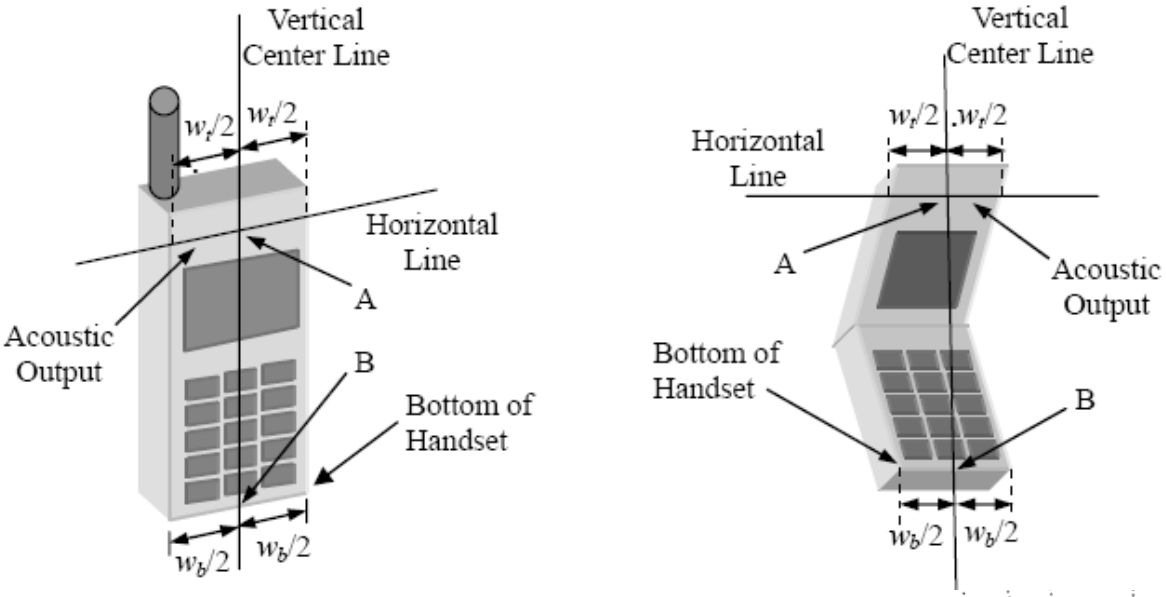


Illustration for Handset Vertical and Horizontal Reference Lines

12.2 Cheek Position

(a) To position the device with the vertical center line of the body of the device and the horizontal line crossing the center piece in a plane parallel to the sagittal plane of the phantom. While maintaining the device in this plane, align the vertical center line with the reference plane containing the three ear and mouth reference point (M: Mouth, RE: Right Ear, and LE: Left Ear) and align the center of the ear piece with the line RE-LE.
(b) To move the device towards the phantom with the ear piece aligned with the line LE-RE until the phone touched the ear. While maintaining the device in the reference plane and maintaining the phone contact with the ear, move the bottom of the phone until any point on the front side is in contact with the cheek of the phantom or until contact with the ear is lost (see below).

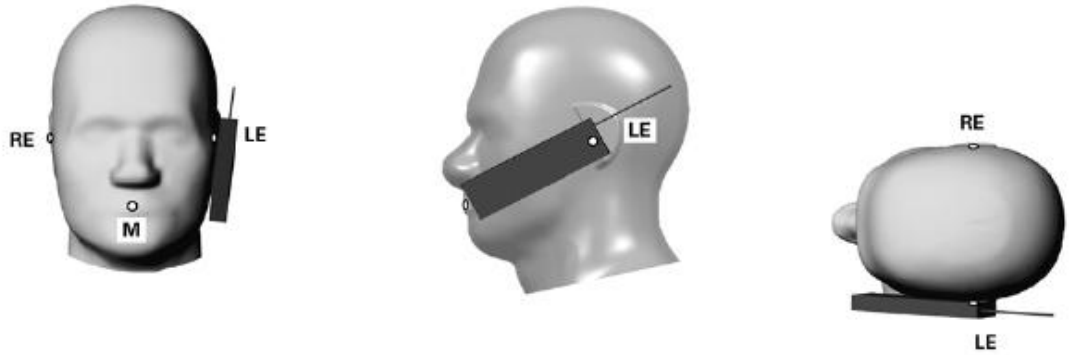


Illustration for Cheek Position

12.3 Tilted Position

(a) To position the device in the “cheek” position described above.

(b) While maintaining the device the reference plane described above and pivoting against the ear, moves it outward away from the mouth by an angle of 15 degrees or until contact with the ear is lost (see below).

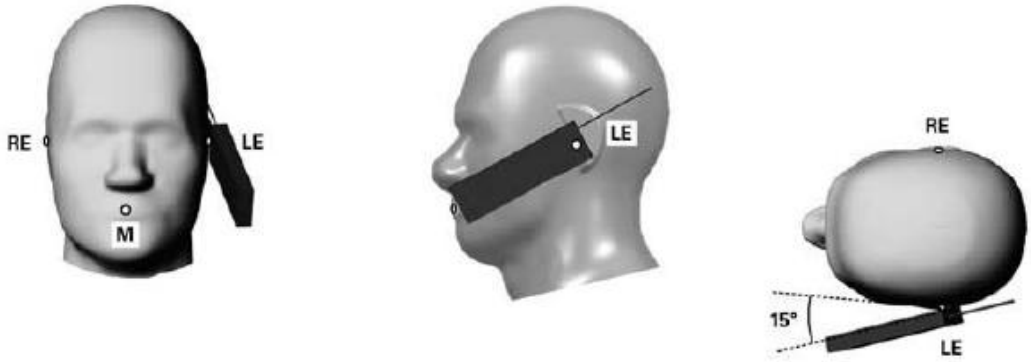
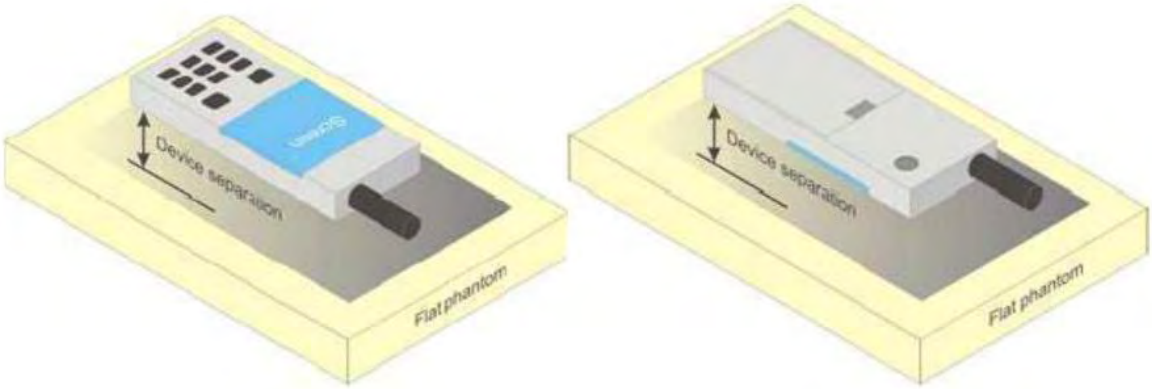


Illustration for Tilted Position

12.4 Body Position

A typical example of a body-worn device is a Mobile Phone, wireless enabled PDA or other battery operated wireless device with the ability to transmit while mounted on a person’s body using a carry accessory approved by the wireless device manufacturer.



Test positions for body-worn devices

13. SAR Measurement Procedures

13.1 Measurement Procedures

The measurement procedures are as follows:
(a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the highest power channel.
(b) Keep EUT to radiate maximum output power or 100% factor (if applicable)
(c) Measure output power through RF cable and power meter.
(d) Place the EUT in the positions as Annex D demonstrates.
(e) Set scan area, grid size and other setting on the SATIMO software.
(f) Measure SAR results for the highest power channel on each testing position.
(g) Find out the largest SAR result on these testing positions of each band
(h) Measure SAR results for other channels in worst SAR testing position if the SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:
(a) Power reference measurement
(b) Area scan
(c) Zoom scan
(d) Power drift measurement

13.2 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 SATIMO 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. 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
(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 3D 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

13.3 Area & Zoom Scan Procedures

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 measures 5x5x7 points with step size 8, 8 and 5 mm for 300 MHz to 3 GHz, and 8x8x8 points with step size 4, 4 and 2.5 mm for 3 GHz to 6 GHz. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g.

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

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

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

13.4 Volume Scan Procedures

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 (step-size is 4, 4 and 2.5 mm). When all volume scan were completed, the software can combine and subsequently superpose these measurement data to calculating the multiband SAR.

13.5 SAR Averaged Methods

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10g and 1 g requires a very fine resolution in the three dimensional scanned data array.

13.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In SATIMO 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.

14. SAR Test Result

14.1 Conducted RF Output Power

Bluetooth			
Modulation	**Frequency (MHz)**	**Conducted Power (dBm)**	**Tune-up power (dBm)**
1-DH5	2402	-0.34	0.0
	2441	-0.29	
	2480	-0.82	
2-DH5	2402	0.38	1.0
	2441	0.51	
	2480	0.04	
3-DH5	2402	0.37	1.0
	2441	0.54	
	2480	0.02	

Note:
Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100MHz to 6GHz at test separation distances ≤ 50mm are determined by:
[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]*[√ f(GHz)] ≤ 3.0 for1-g SAR and ≤ 7.5 for 10-g extremity SAR
f(GHz) is the RF channel transmit frequency in GHz
Power and distance are rounded to the nearest mW and mm before calculation
The result is rounded to one decimal place for comparison

Turn up Power (dBm)	Turn up Power (mW)	Separation Distance (mm)	Frequency (GHz)	Result	Exclusion Thresholds
1.0	1.26	5	2.480	0.40	3.0

Per KDB 447498 D01v06, when the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.
According to the calculation results in the table above, Bluetooth SAR does not need to be tested.

GSM - Burst Average Power (dBm)								
Band	**GSM850**				**GSM1900**			
Frequency (MHz)	**824.2**	**836.6**	**848.8**	**Tune-up**	**1850.2**	**1880**	**1909.8**	**Tune-up**
GSM	**32.91**	32.89	32.76	33.0	**28.87**	28.29	27.70	29.0
GPRS slots-1	33.37	33.48	33.50	34.0	30.14	29.99	29.57	30.5
GPRS slots-2	32.63	32.66	32.68	33.0	29.48	29.30	28.88	29.5
GPRS slots-3	30.72	30.82	30.85	31.0	27.77	27.65	27.21	28.0
GPRS slots-4	29.51	29.57	29.63	30.0	26.69	26.58	26.20	27.0
EGPRS slots-1	33.38	33.45	33.47	33.5	30.21	30.04	29.63	30.5
EGPRS slots-2	32.61	32.62	32.64	33.0	29.51	29.33	28.91	30.0
EGPRS slots-3	30.68	30.76	30.83	31.0	27.80	27.68	27.27	28.0
EGPRS slots-4	29.46	29.56	29.60	30.0	26.73	26.61	26.23	27.0

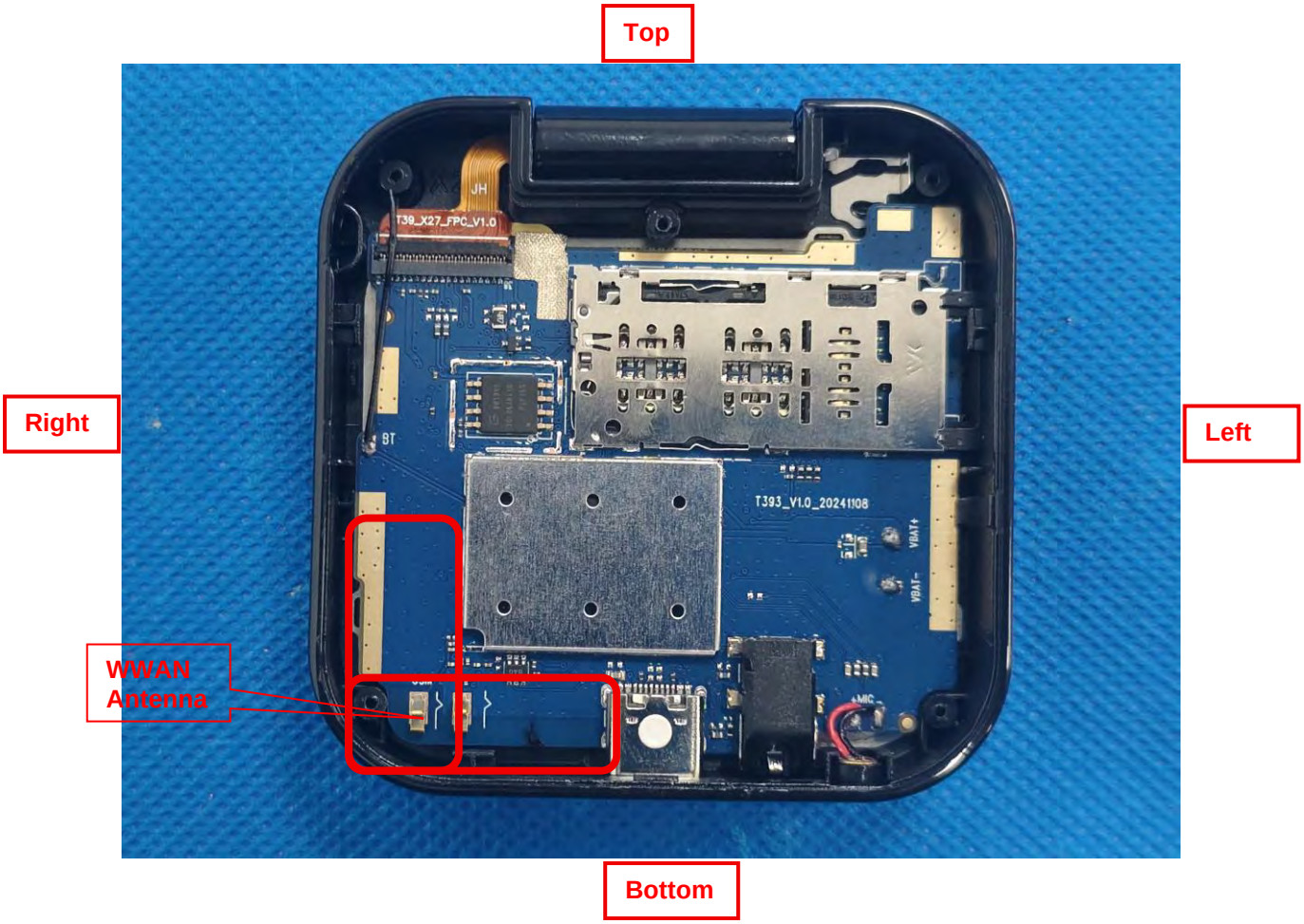
GSM - Source-Based Time-Average Power (dBm)						
Band	**GSM850**			**GSM1900**		
Frequency (MHz)	**824.2**	**836.6**	**848.8**	**1850.2**	**1880**	**1909.8**
GSM	23.91	23.89	23.76	19.87	19.29	18.70
GPRS slots-1	24.37	24.48	24.50	21.14	20.99	20.57
GPRS slots-2	26.63	26.66	**26.68**	23.48	23.30	22.88
GPRS slots-3	26.47	26.57	26.60	23.52	23.40	22.96
GPRS slots-4	26.51	26.57	26.63	**23.69**	23.58	23.20
EGPRS slots-1	24.38	24.45	24.47	21.21	21.04	20.63
EGPRS slots-2	26.61	26.62	26.64	23.51	23.33	22.91
EGPRS slots-3	26.43	26.51	26.58	23.55	23.43	23.02
EGPRS slots-4	26.46	26.56	26.60	23.73	23.61	23.23

Notes:

1. Division Factors
   To average the power, the division factor is as follows:
   1TX-slots = 1 transmit time slots out of 8 time slots=> conducted power divided by (8/1) => -9.00dB
   2TX-slots = 2 transmit time slots out of 8 time slots=> conducted power divided by (8/2) => -6.00dB
   3TX-slots = 3 transmit time slots out of 8 time slots=> conducted power divided by (8/3) => -4.26dB
   4TX-slots = 4 transmit time slots out of 8 time slots=> conducted power divided by (8/4) => -3.00Db
2. According to the conducted power as above, the GPRS measurements are performed with slots-2 for GPRS850 and slots-4 GPRS1900.
3. Per KDB 941225 D01, SAR is not required for EDGE (8PSK) mode because the maximum output power and tune-up limit is ≤ 1/4dB higher than GPRS/EDGE (GMSK) or the adjusted SAR of the highest reported SAR of GPRS/EDGE (GMSK) is ≤ 1.2W/kg.
4. Per KDB 941225 D01, SAR test reduction for GPRS and EDGE modes is determined by the source-based time-averaged output power specified for production units, including tune-up tolerance. The data mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions.

14.2 Transmit Antennas and SAR Measurement Position

EUT Antenna Back view:



Antennas	Support Band
WWAN	GSM 850/1900 TX/RX

Distance of The Antenna to the EUT surface and edge (mm)						
Antennas	Front	Back	Top Side	Bottom Side	Left Side	Right Side
WWAN	<25	<25	32	<25	32	<25

Body mode: Positions for SAR tests						
Antennas	Front	Back	Top Side	Bottom Side	Left Side	Right Side
WWAN	Yes	Yes	No	Yes	No	Yes

14.3 Measured and Reported (Scaled) SAR Results

The calculated SAR is obtained by the following formula:

1. Reported SAR for WWAN=Measured SAR * Tune-up Scaling factor
2. Reported SAR for WLAN and Bluetooth=Measured SAR * Tune-up Scaling factor * Duty Cycle Scaling factor
3. Duty Cycle Scaling factor=1/ Duty Cycle (%)
4. Per KDB 941225 D01, SAR test reduction for GPRS and EDGE modes is determined by the source-based time-averaged output power specified for production units, including tune-up tolerance. The data mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions.

GSM 850									
RF Exposure Conditions	**Mode**	**Test Position**	**Freq. (MHz)**	**Power (dBm)**		**Scaling Factor**	**SAR_{1g} (W/kg)**		**Plot No.**
				Meas.	**Tuen-up**		**Meas.**	**Scaled**	
Head	GSM	Left Cheek	824.2	32.91	33.0	1.021	0.362	0.370	
		Left Tilt	824.2	32.91	33.0	1.021	0.177	0.181	
		Right Cheek	824.2	32.91	33.0	1.021	0.461	**0.471**	**1**
		Right Tilt	824.2	32.91	33.0	1.021	0.228	0.233	
Body	GSM	Front Face	824.2	32.91	33.0	1.021	0.404	0.412	
		Back Face	824.2	32.91	33.0	1.021	0.528	**0.539**	**2**
		Left Side	824.2	32.91	33.0	1.021	0.308	0.314	
		Right Side	824.2	32.91	33.0	1.021	0.412	0.421	
		Bottom Side	824.2	32.91	33.0	1.021	0.451	0.460	
		Back - with headphones	824.2	32.91	33.0	1.021	0.469	0.479	
	GPRS slots-2	Front Face	848.8	32.68	33.0	1.076	0.314	0.338	
		Back Face	848.8	32.68	33.0	1.076	0.447	0.481	
		Left Side	848.8	32.68	33.0	1.076	0.241	0.259	
		Right Side	848.8	32.68	33.0	1.076	0.357	0.384	
		Bottom Side	848.8	32.68	33.0	1.076	0.331	0.356	
		Back - with headphones	848.8	32.68	33.0	1.076	0.390	0.420	

GSM 1900									
RF Exposure Conditions	Mode	Test Position	Freq. (MHz)	Power (dBm)		Scaling Factor	SAR_{1g} (W/kg)		Plot No.
				Meas.	Tuen-up		Meas.	Scaled	
Head	GSM	Left Cheek	1850.2	28.87	29.0	1.030	0.520	0.536	
		Left Tilt	1850.2	28.87	29.0	1.030	0.249	0.257	
		Right Cheek	1850.2	28.87	29.0	1.030	0.560	**0.577**	**3**
		Right Tilt	1850.2	28.87	29.0	1.030	0.237	0.244	
Body	GSM	Front Face	1850.2	28.87	29.0	1.030	0.276	0.284	
		Back Face	1850.2	28.87	29.0	1.030	0.458	**0.472**	**4**
		Left Side	1850.2	28.87	29.0	1.030	0.240	0.247	
		Right Side	1850.2	28.87	29.0	1.030	0.374	0.385	
		Bottom Side	1850.2	28.87	29.0	1.030	0.391	0.403	
		Back - with headphones	1850.2	28.87	29.0	1.030	0.320	0.330	
	GPRS slots-4	Front Face	1850.2	26.69	27.0	1.074	0.205	0.220	
		Back Face	1850.2	26.69	27.0	1.074	0.334	0.359	
		Left Side	1850.2	26.69	27.0	1.074	0.214	0.230	
		Right Side	1850.2	26.69	27.0	1.074	0.309	0.332	
		Bottom Side	1850.2	26.69	27.0	1.074	0.333	0.358	
		Back - with headphones	1850.2	26.69	27.0	1.074	0.307	0.330	

14.4 SAR Measurement Variability

According to KDB865664, Repeated measurements are required only when the measured SAR is ≥ 0.80 W/kg. If the measured SAR value of the initial repeated measurement is < 1.45 W/kg with ≤ 20% variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required. 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.19 The repeated measurement results must be clearly identified in the SAR report. All measured SAR, including the repeated results, must be considered to determine compliance and for reporting according to KDB 690783.Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

1) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
2) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
3) 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.
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

Test Mode	Frequency (MHz)	RF Exposure Configuration	Test Position	Repeated SAR (yes/no)	Highest Measured SAR1-g (W/Kg)	First Repeated	
						Measured SAR1-g (W/Kg)	Largest to Smallest SAR Ratio
/	/	/	/	/	/	/	/

14.5 Simultaneous Transmission Evaluation

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmiting antenna.

Application Simultaneous Transmission information:

No.	Configurations	Head SAR	Body SAR
1	WWAN+WIFI	No	No
2	WWAN+Bluetooth	Yes	Yes
3	WIFI+Bluetooth	No	No

Remark:
1. The prototype WWAN antenna only supports GSM functions.
2. The product does not support WIFI functions.
3. According to the KDB 447498 D01 v06, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following 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

Estimated stand alone SAR						
Mode	Frequency (MHz)	Maximum Power (dBm)	Maximum Power (mW)	Separation Distance (mm)	X	Estimated SAR1-g (W/kg)
Bluetooth	2480	1.0	1.26	5	3	0.053

Note:
1. Bluetooth*- Including Lower power Bluetooth
2. Maximum average power including tune-up tolerance;
3. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion

4. Per FCC KD B447498 D01, simultaneous transmission SAR test exclusion may be applied when the sum of the 1-g SAR for all the transmitting antenna in a specific a physical test configuration is ≤1.6 W/Kg. When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

$$\text{Ratio}=\frac{(\text{SAR}_1+\text{SAR}_2)^{1.5}}{(\text{peak location separation,mm})}<0.04$$

5. Simultaneous transmission of maximum SAR sum calculation.

RF Exposure Conditions	Test Position	Scaled SAR_{1g} (W/kg)		Summed SAR_{1g} (W/kg)	Limit SAR_{1g} (W/kg)
		WWAN	Bluetooth		
Head	Left Cheek	0.536	0.053	0.589	1.6
	Left Tilt	0.257	0.053	0.310	
	Right Cheek	0.577	0.053	**0.630**	
	Right Tilt	0.244	0.053	0.297	
Body	Front Face	0.412	0.053	0.465	
	Back Face	0.539	0.053	**0.592**	
	Left Side	0.314	0.053	0.367	
	Right Side	0.421	0.053	0.474	
	Top Side	/	0.053	0.053	
	Bottom Side	0.460	0.053	0.513	

15. Test Plots

15.1 System Performance Check

System check at 835 MHz
Date of measurement: 19/5/2025

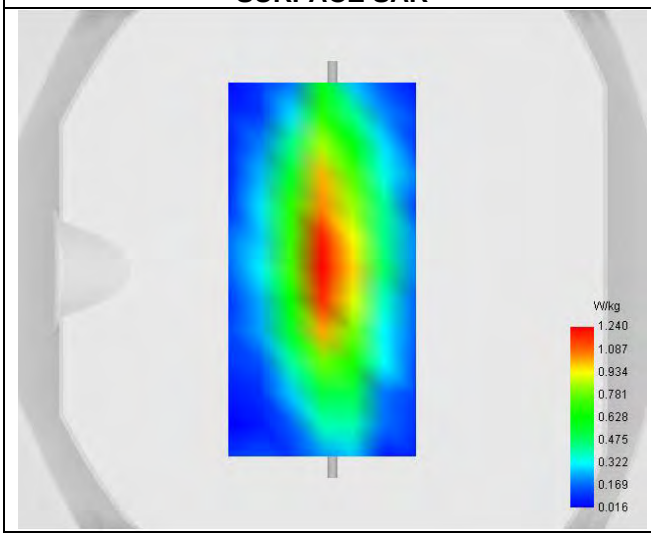
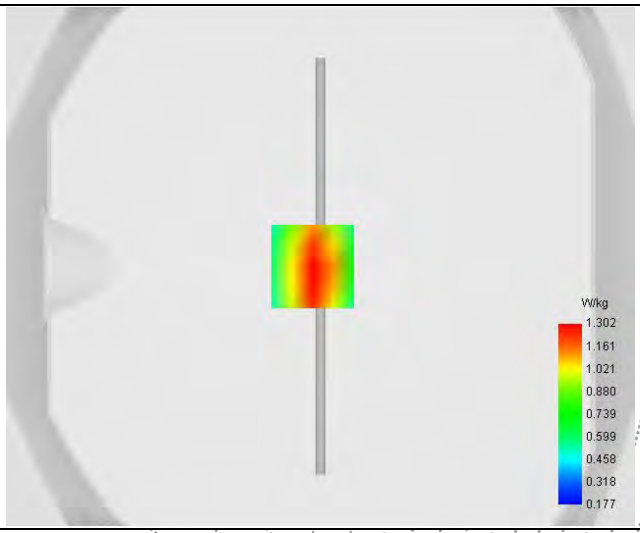
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	0.81
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Dipole
Band	CW835
Signal	CW

B. Permitivity

Frequency (MHz)	835.000
Relative permitivity (real part)	42.626
Relative permitivity (imaginary part)	20.910
Conductivity (S/m)	0.905

C. SAR Surface and Volume

SURFACE SAR	**VOLUME SAR**
	

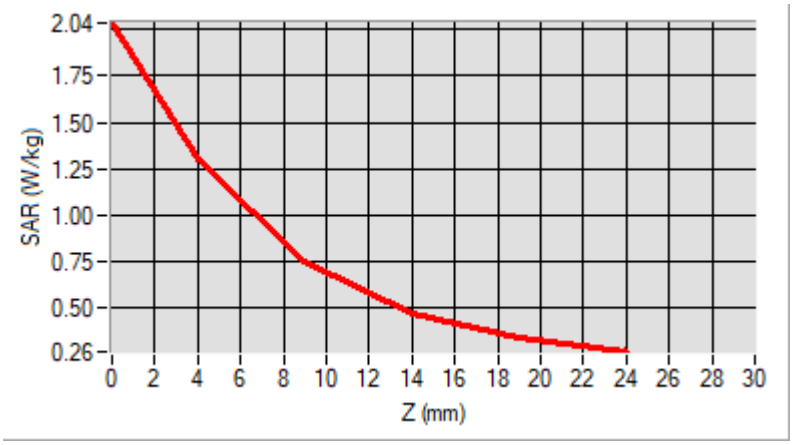
Maximum location: X=-3.00, Y=0.00 ; SAR Peak: 2.06 W/kg

D. SAR 1g & 10g

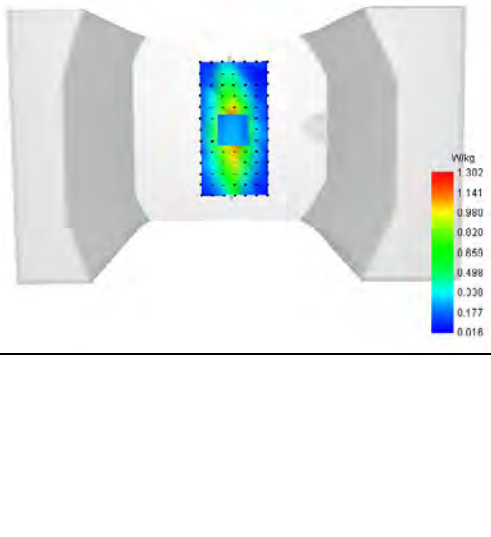
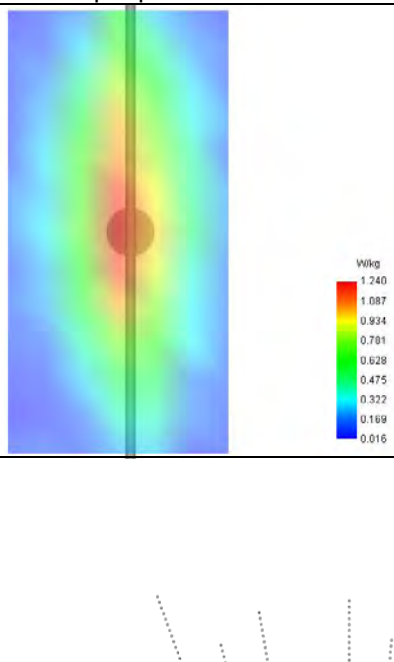
SAR 10g (W/Kg)	1.603
SAR 1g (W/Kg)	2.403
Variation (%)	-3.448

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.036	1.302	0.747	0.462	0.331



F. 3D Image

3D screen shot	Hot spot position
	

System check at 1900 MHz
Date of measurement: 19/5/2025

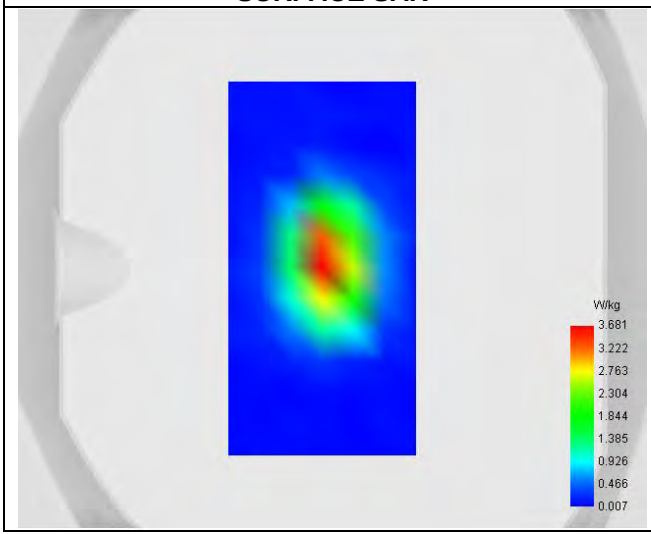
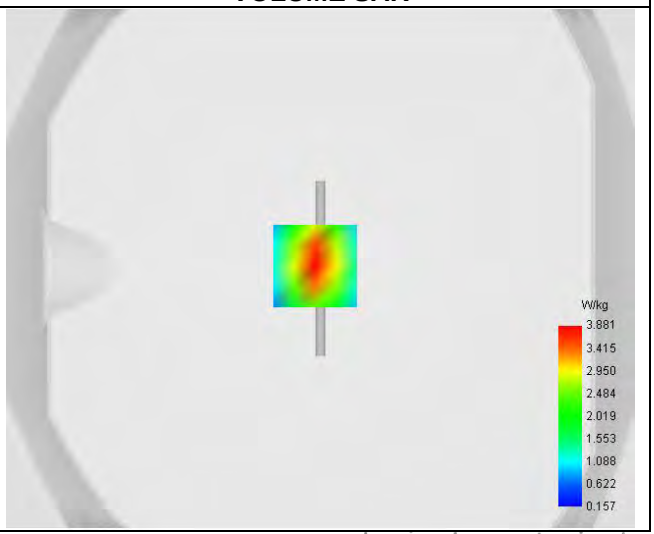
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	1.04
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Dipole
Band	CW1900
Signal	CW

B. Permitivity

Frequency (MHz)	1900.000
Relative permitivity (real part)	39.970
Relative permitivity (imaginary part)	14.400
Conductivity (S/m)	1.439

C. SAR Surface and Volume

SURFACE SAR	**VOLUME SAR**
	

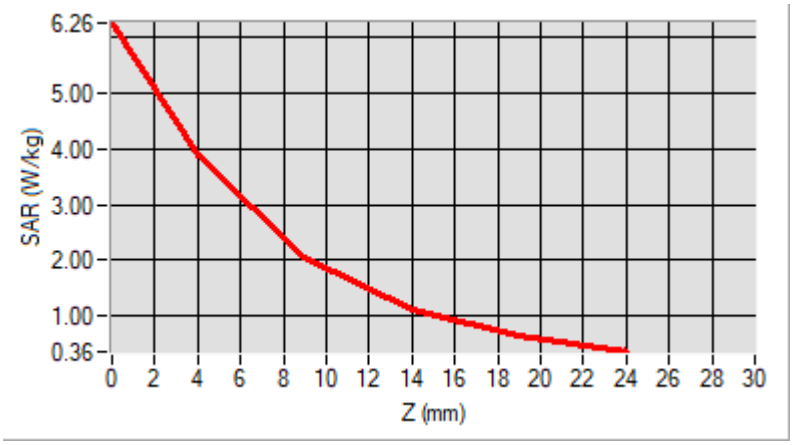
Maximum location: X=-2.00, Y=1.00 ; SAR Peak: 6.27 W/kg

D. SAR 1g & 10g

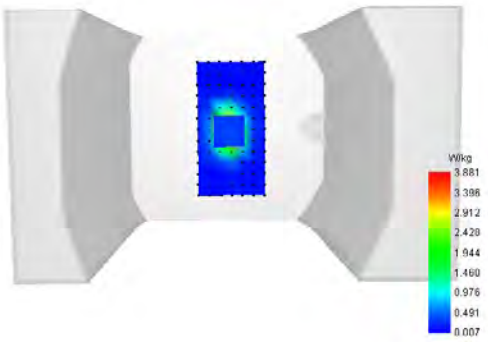
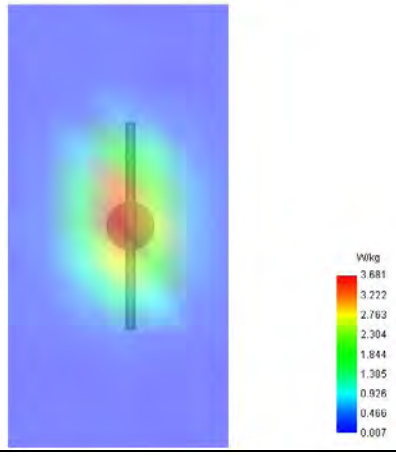
SAR 10g (W/Kg)	5.183
SAR 1g (W/Kg)	10.413
Variation (%)	1.743

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	6.259	3.881	2.069	1.111	0.634



F. 3D Image

3D screen shot	Hot spot position
	

15.2 SAR Test Graph Results

Plot 1
Date of measurement: 19/5/2025

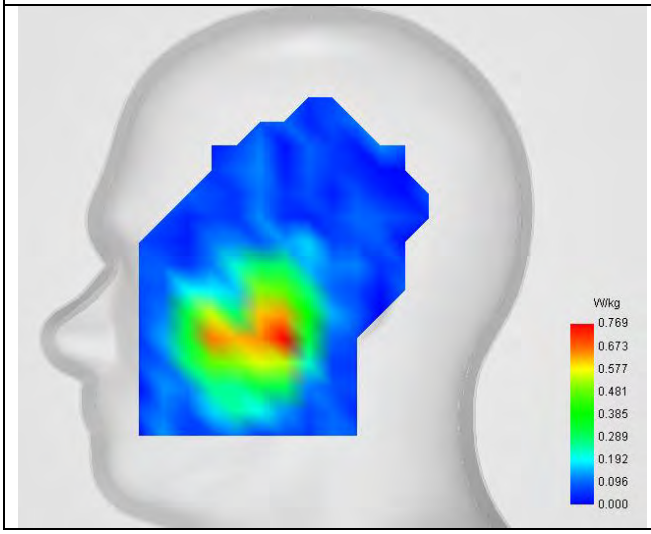
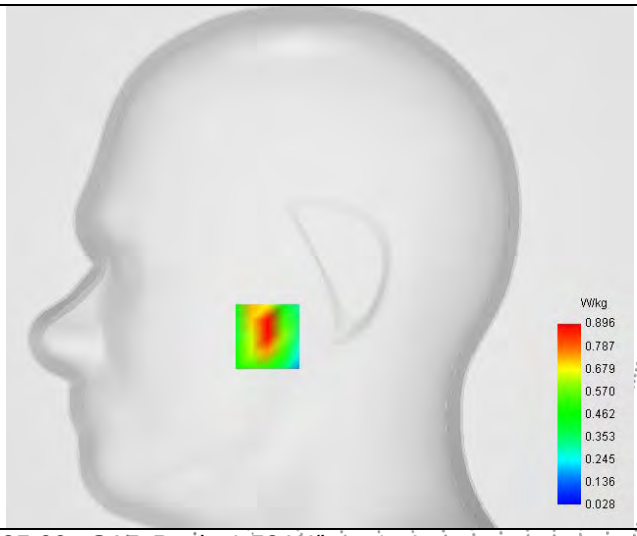
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	0.81
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Right head
Device Position	Cheek
Band	GSM850
Signal	TDMA (GSM)
Modulation	GMSK

B. Permitivity

Frequency (MHz)	824.200
Relative permitivity (real part)	42.626
Relative permitivity (imaginary part)	19.400
Conductivity (S/m)	0.905

C. SAR Surface and Volume

SURFACE SAR	VOLUME SAR
	

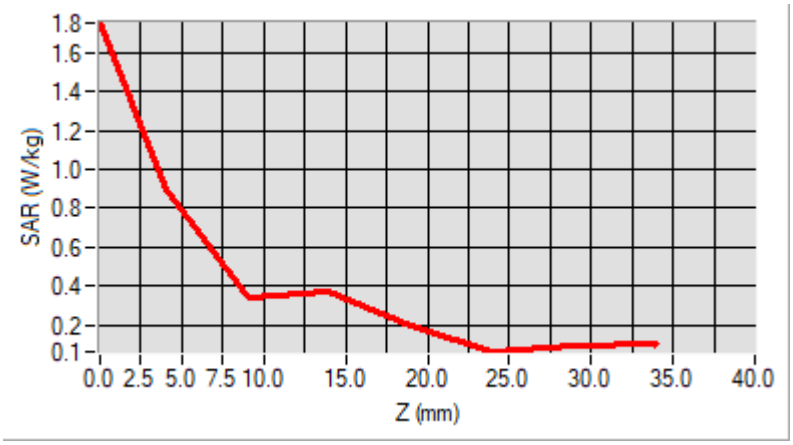
Maximum location: X=-26.00, Y=-35.00 ; SAR Peak: 1.58 W/kg

D. SAR 1g & 10g

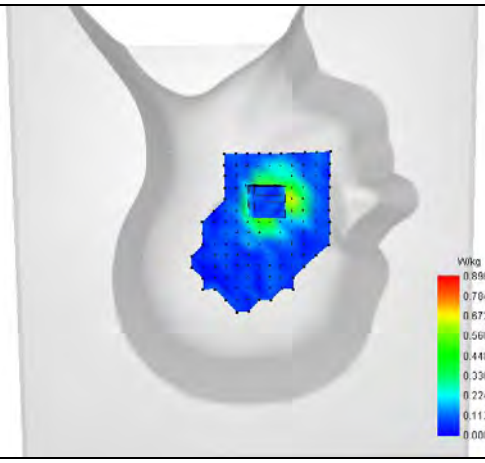
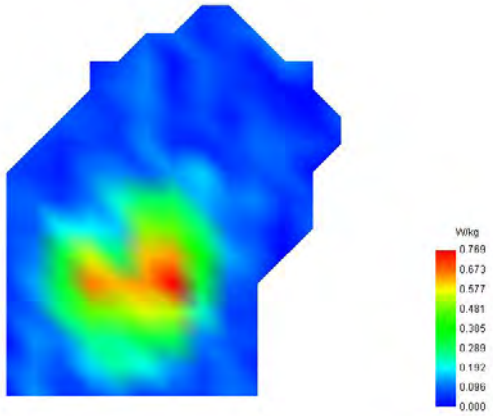
SAR 10g (W/Kg)	0.329
SAR 1g (W/Kg)	0.461
Variation (%)	-4.490

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	1.753	0.896	0.342	0.375	0.200	0.063	0.093



F. 3D Image

3D screen shot	Hot spot position
	

Plot 2

Date of measurement: 19/5/2025

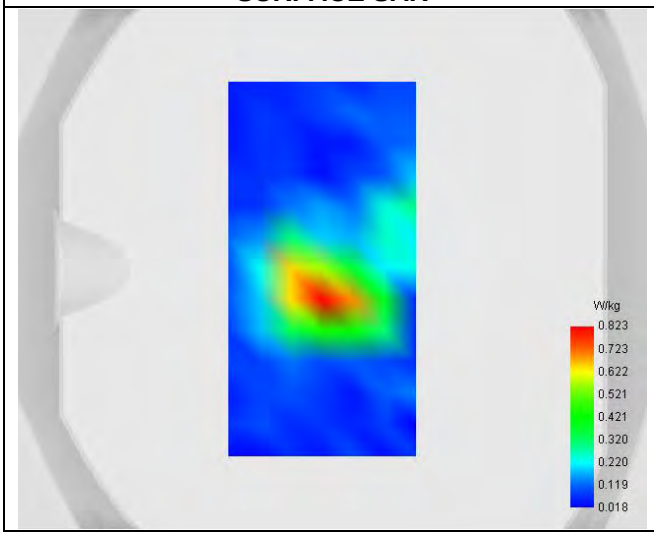
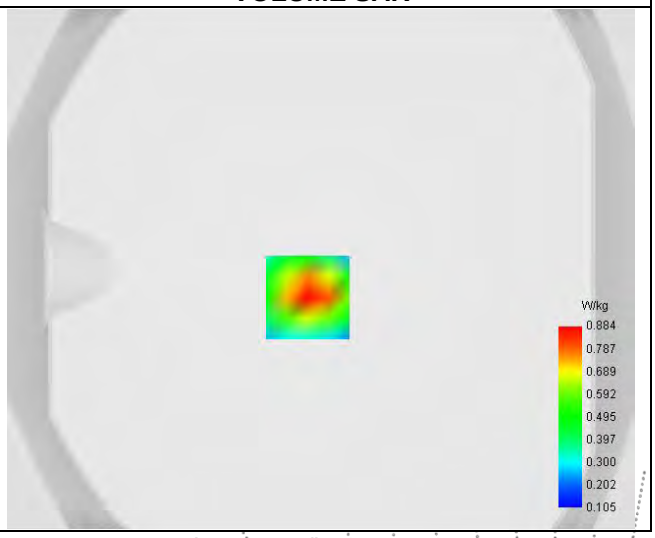
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	0.81
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	GSM850
Signal	TDMA (GSM)
Modulation	GMSK

B. Permitivity

Frequency (MHz)	824.200
Relative permitivity (real part)	42.626
Relative permitivity (imaginary part)	19.400
Conductivity (S/m)	0.905

C. SAR Surface and Volume

SURFACE SAR	**VOLUME SAR**
	

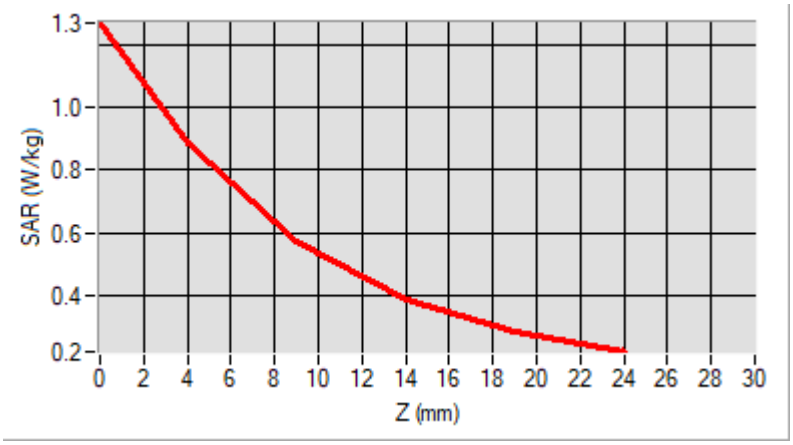
Maximum location: X=-5.00, Y=-11.00 ; SAR Peak: 1.28 W/kg

D. SAR 1g & 10g

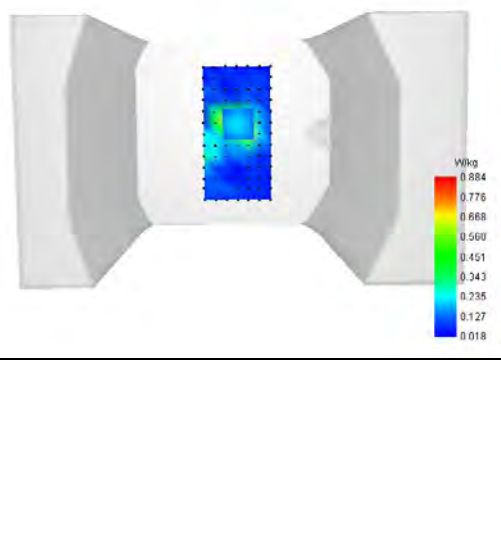
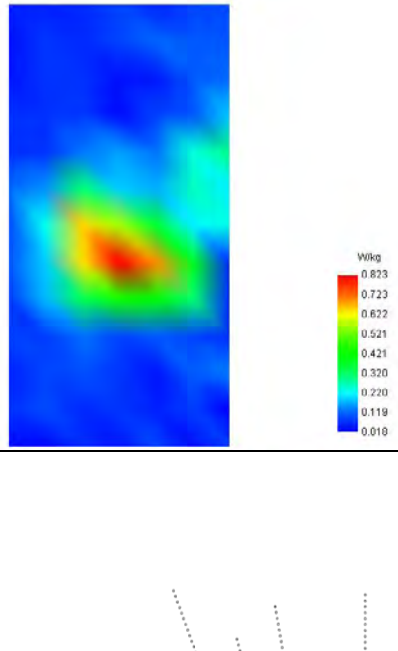
SAR 10g (W/Kg)	0.397
SAR 1g (W/Kg)	0.528
Variation (%)	-3.120

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	1.270	0.884	0.569	0.385	0.284



F. 3D Image

3D screen shot	Hot spot position
	

Plot 3
Date of measurement: 19/5/2025

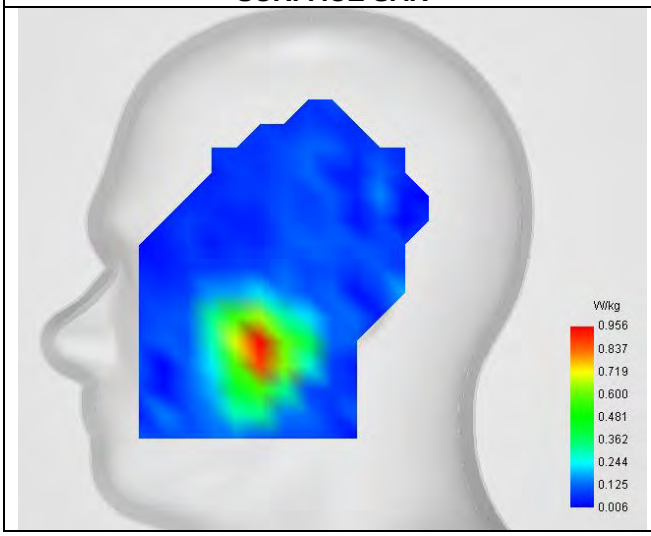
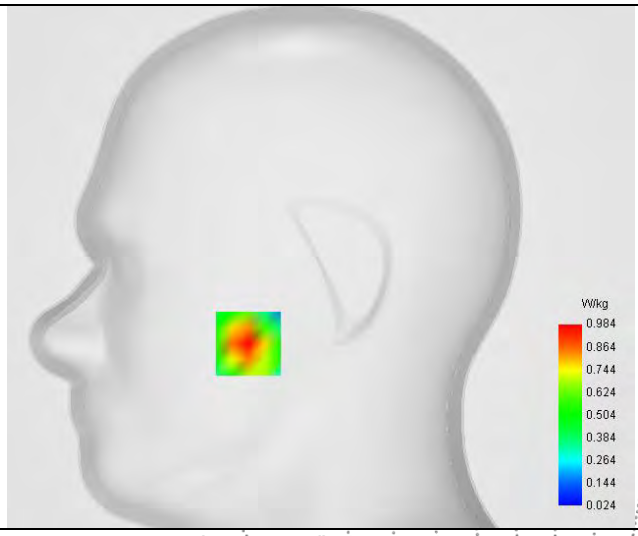
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	1.04
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Right head
Device Position	Cheek
Band	GSM1900
Signal	TDMA (GSM)
Modulation	GMSK

B. Permitivity

Frequency (MHz)	1850.200
Relative permitivity (real part)	39.970
Relative permitivity (imaginary part)	13.408
Conductivity (S/m)	1.439

C. SAR Surface and Volume

SURFACE SAR	**VOLUME SAR**
	

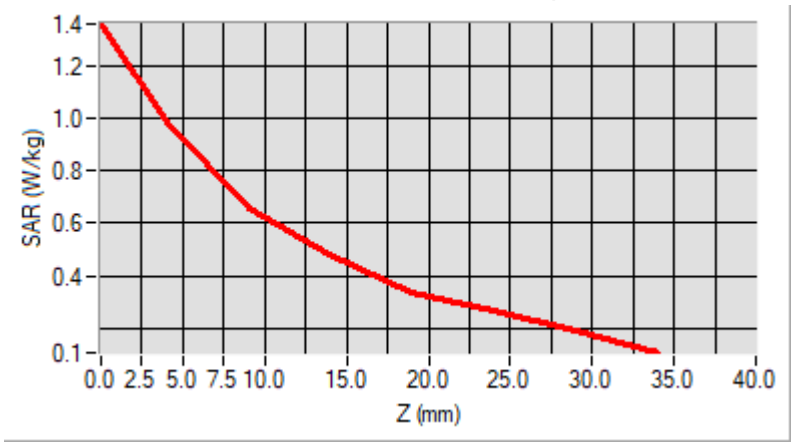
Maximum location: X=-36.00, Y=-38.00 ; SAR Peak: 1.38 W/kg

D. SAR 1g & 10g

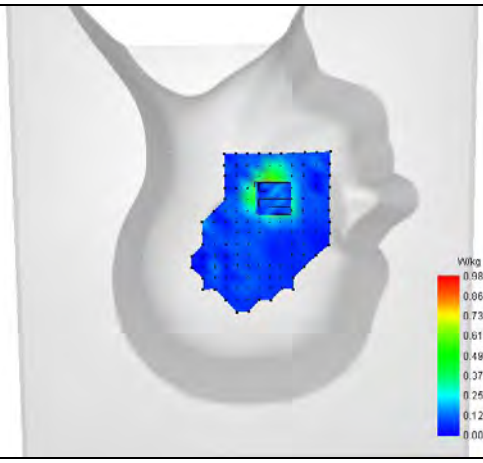
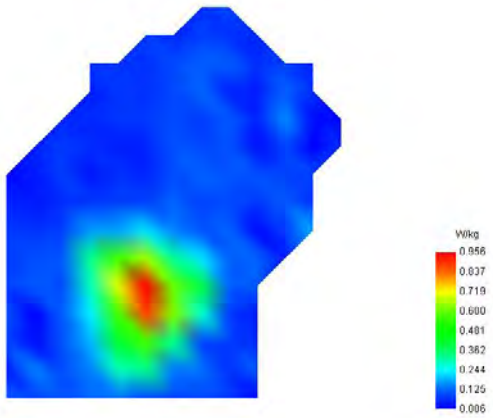
SAR 10g (W/Kg)	0.365
SAR 1g (W/Kg)	0.560
Variation (%)	-4.570

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	1.361	0.984	0.660	0.478	0.338	0.264	0.187



F. 3D Image

3D screen shot	Hot spot position
	

Plot 4
Date of measurement: 19/5/2025

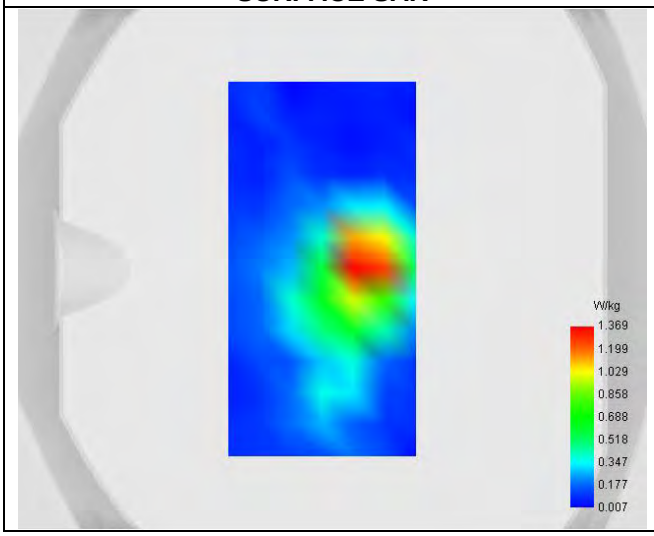
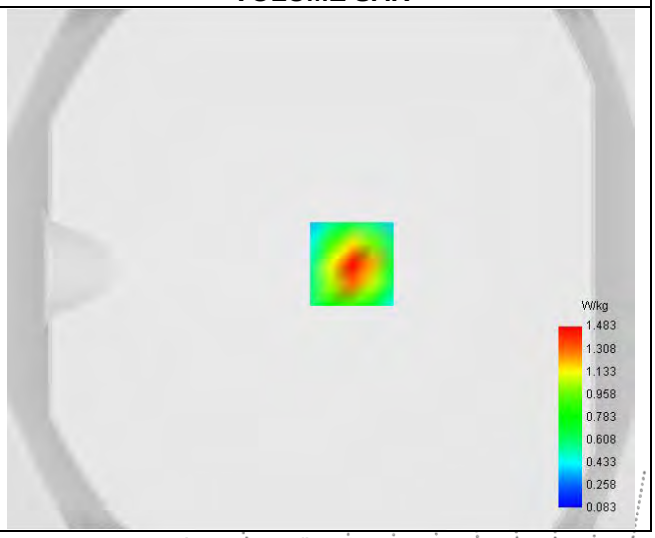
A. Experimental conditions.

Probe	SN 26/23 EPGO420
ConvF	1.04
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5.0mm
Phantom	Validation plane
Device Position	Body
Band	GSM1900
Signal	TDMA (GSM)
Modulation	GMSK

B. Permitivity

Frequency (MHz)	1850.200
Relative permitivity (real part)	39.970
Relative permitivity (imaginary part)	13.629
Conductivity (S/m)	1.439

C. SAR Surface and Volume

SURFACE SAR	**VOLUME SAR**
	

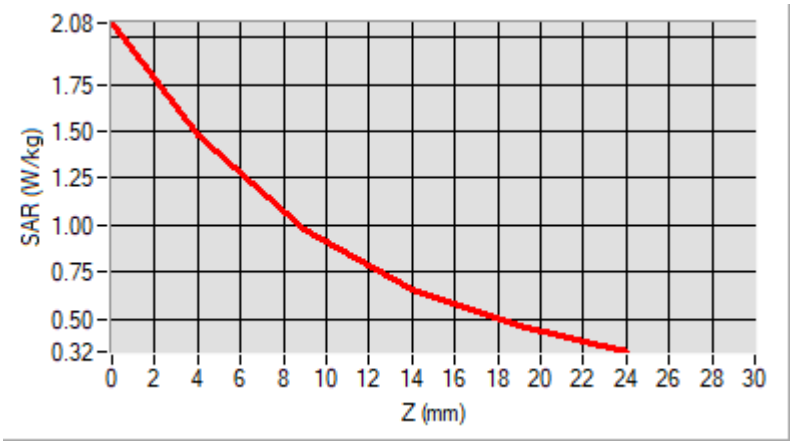
Maximum location: X=12.00, Y=2.00 ; SAR Peak: 2.09 W/kg

D. SAR 1g & 10g

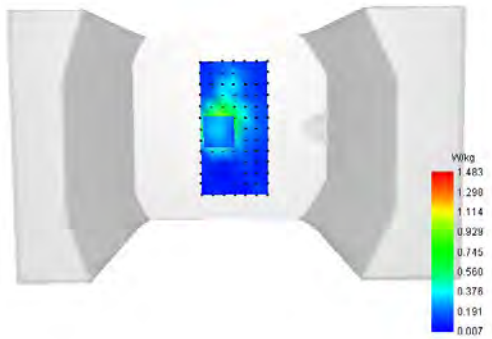
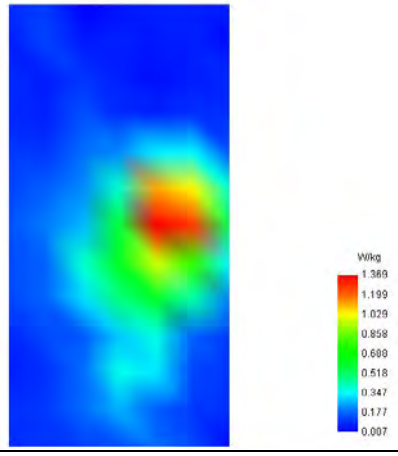
SAR 10g (W/Kg)	0.304
SAR 1g (W/Kg)	0.458
Variation (%)	0.480

E. Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	2.077	1.483	0.973	0.654	0.459



F. 3D Image

3D screen shot	Hot spot position
	

16. CALIBRATION CERTIFICATES

Probe-EPGO420 Calibration Certificate
SID835Dipole Calibration Ceriticate
SID1900Dipole Calibration Ceriticate

COMOSAR E-Field Probe Calibration Report

Ref : ACR.199.1.24.BES.A

SHENZHEN BCTC TECHNOLOGY CO., LTD.
1 ~2/ F, NO. B FACTORY BUILDING, PENGZHOU INDUSTRIAL PARK, FUYUAN 1ST ROAD, TANGWEI COMMUNITY, FUHAI STREET, BAO'AN DISTRICT, SHENZHEN, GUANGDONG,CHINA

MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: 2623-EPGO-420

Calibrated at MVG
Z.I. de la pointe du diable
Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE

Calibration date: 7/18/2024

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

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

Summary:

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

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.199.1.24.BES.A

	Name	*Function*	*Date*	*Signature*
Prepared by :	Cyrille ONNEE	Measurement Responsible	7/18/2024	
Checked & approved by:	Jérôme Luc	Technical Manager	7/18/2024	
Authorized by:	Yann Toutain	Laboratory Director	7/18/2024	

Yann Toutain ID Signature numérique de Yann Toutain ID Date : 2024.07.18 10:38:49 +02'00'

	Customer Name
Distribution :	Shenzhen BCTC Technology Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Cyrille ONNEE	7/18/2024	Initial release

Page: 2/11

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1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	2623-EPGO-420
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.228 MΩ Dipole 2: R2=0.238 MΩ Dipole 3: R3=0.230 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

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

Figure 1 – *MVG COMOSAR Dosimetric E field Probe*

Probe Length	330 mm
Length of Individual Dipoles	24.5 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	2.55 mm
Distance between dipoles / probe extremity	12.7 mm

3 MEASUREMENT METHOD

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

3.1 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards for frequency range 600-7500MHz and using the calorimeter cell method (transfer method) as outlined in the standards for frequency 150-450 MHz.

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3.2 LINEARITY

The evaluation of the linearity was done in free space using the waveguide, performing a power sweep to cover the SAR range 0.01W/kg to 100W/kg.

3.3 ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 to 360 degrees in 15-degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis (0°–180°) in 15° increments. At each step the probe is rotated about its axis (0°–360°).

3.4 BOUNDARY EFFECT

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

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

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

where

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

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

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4 MEASUREMENT UNCERTAINTY

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

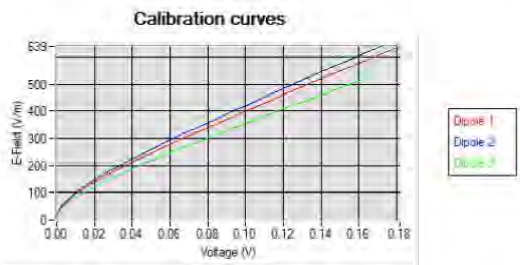
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

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

5.1 CALIBRATION IN AIR

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



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

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

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

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Normx dipole 1 (µV/(V/m)^2)	Normy dipole 2 (µV/(V/m)^2)	Normz dipole 3 (µV/(V/m)^2)
1.21	1.09	1.56

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
106	109	103

5.2 CALIBRATION IN LIQUID

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

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

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

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

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

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

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

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

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

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

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

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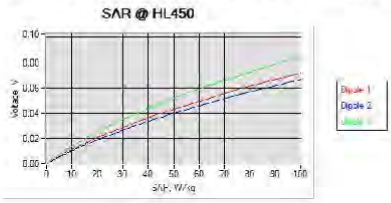
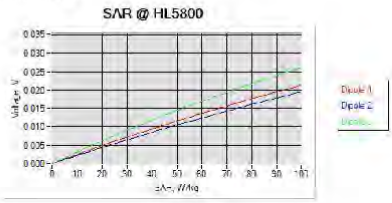
The below table summarize the ConvF for the calibrated liquid. The curves give examples for the measured SAR depending on the voltage in some liquid.

Liquid	Frequency (MHz*)	ConvF
HL450	450	0.86
BL450	450	0.78
HL750	750	0.80
BL750	750	0.87
HL850	835	0.81
BL850	835	0.80
HL900	900	0.76
BL900	900	0.87
HL1800	1800	0.96
BL1800	1800	1.01
HL1900	1900	1.04
BL1900	1900	1.11
HL2100	2100	1.00
BL2100	2100	1.16
HL2300	2300	1.11
BL2300	2300	1.23
HL2450	2450	1.11
BL2450	2450	1.32
HL2600	2600	1.03
BL2600	2600	1.19
HL5200	5200	1.18
BL5200	5200	0.97
HL5400	5400	1.17
BL5400	5400	1.00
HL5600	5600	1.20
BL5600	5600	0.95
HL5800	5800	1.15
BL5800	5800	1.05

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





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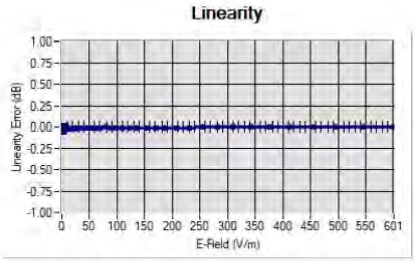
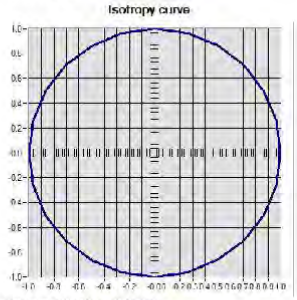
6 VERIFICATION RESULTS

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



Linearity:+/-1.48% (+/-0.06dB)



Isotropy: +/-0.25% (+/-0.01dB)

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7 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Descriptio	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2024	08/2027
Network Analyzer	Agilent 8753ES	MY40003210	10/2023	10/2027
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2025
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2024	06/2027
Power Meter	Keysight U2000A	SN: MY62340002	10/2022	10/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Fluoroptic Thermometer	LumaSense Luxtron 812	94264	09/2022	09/2025
Coaxial cell	MVG	SN 32/16 COAXCELL_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG2_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G600_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.

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Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_5G000_	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG14_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_7G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2024	06/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.329.9.24.BES.A

SHENZHEN BCTC TECHNOLOGY CO., LTD.
1 ~2/ F, NO. B FACTORY BUILDING, PENGZHOU INDUSTRIAL PARK, FUYUAN 1ST ROAD, TANGWEI COMMUNITY, FUHAI STREET, BAO'AN DISTRICT, SHENZHEN, GUANGDONG,CHINA

MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 835 MHZ
SERIAL NO.: SN 47/21 DIP 0G835-621

Calibrated at MVG
Z.I. de la pointe du diable
Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE

Calibration date: 11/25/2024

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

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Summary:

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

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.9.24.BES.A

	Name	*Function*	*Date*	*Signature*
Prepared by :	Jérôme Luc	Technical Manager	11/25/2024	JS
Checked by :	Jérôme Luc	Technical Manager	11/25/2024	JS
Approved by :	Yann Toutain	Laboratory Director	11/25/2024	Yann TOUTAIN 2024.11.25 11:52:29 +01'00'

	Customer Name
Distribution :	Shenzhen BCTC Technology Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Jérôme Luc	11/25/2024	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 835 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID835
Serial Number	SN 47/21 DIP 0G835-621
Product Condition (new / used)	New

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

4.1 RETURN LOSS REQUIREMENTS

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

4.2 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness. A direct method is used with a ISO17025 calibrated caliper.

5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.08 LIN

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
0 - 300	0.20 mm
300 - 450	0.44 mm

5.3 VALIDATION MEASUREMENT

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

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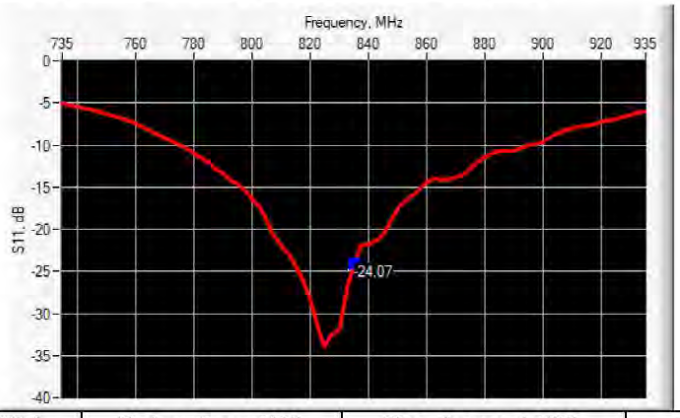
Scan Volume	Expanded Uncertainty
1 g	19 % (SAR)
10 g	19 % (SAR)

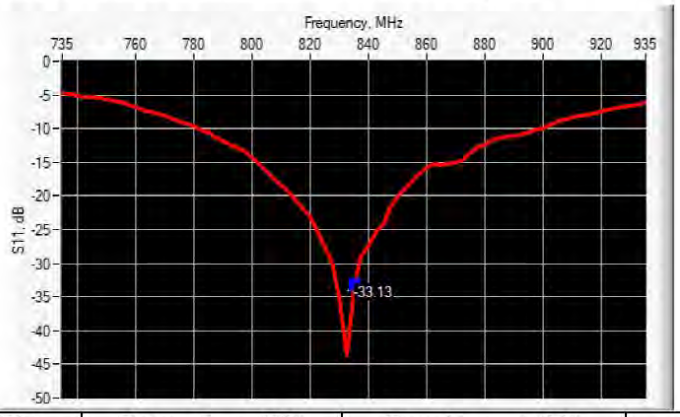
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
835	-24.07	-20	55.3 Ω - 3.3 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
835	-33.13	-20	52.2 Ω - 0.4 jΩ

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6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	**420.0** ±1 %.		**250.0** ±1 %.		**6.35** ±1 %.	
450	**290.0** ±1 %.		**166.7** ±1 %.		**6.35** ±1 %.	
750	**176.0** ±1 %.		**100.0** ±1 %.		**6.35** ±1 %.	
835	**161.0** ±1 %.	161.47	**89.8** ±1 %.	89.78	**3.6** ±1 %.	3.61
900	**149.0** ±1 %.		**83.3** ±1 %.		**3.6** ±1 %.	
1450	**89.1** ±1 %.		**51.7** ±1 %.		**3.6** ±1 %.	
1500	**86.2** ±1 %.		**50.0** ±1 %.		**3.6** ±1 %.	
1640	**79.0** ±1 %.		**45.7** ±1 %.		**3.6** ±1 %.	
1750	**75.2** ±1 %.		**42.9** ±1 %.		**3.6** ±1 %.	
1800	**72.0** ±1 %.		**41.7** ±1 %.		**3.6** ±1 %.	
1900	**68.0** ±1 %.		**39.5** ±1 %.		**3.6** ±1 %.	
1950	**66.3** ±1 %.		**38.5** ±1 %.		**3.6** ±1 %.	
2000	**64.5** ±1 %.		**37.5** ±1 %.		**3.6** ±1 %.	
2100	**61.0** ±1 %.		**35.7** ±1 %.		**3.6** ±1 %.	
2300	**55.5** ±1 %.		**32.6** ±1 %.		**3.6** ±1 %.	
2450	**51.5** ±1 %.		**30.4** ±1 %.		**3.6** ±1 %.	
2600	**48.5** ±1 %.		**28.8** ±1 %.		**3.6** ±1 %.	
3000	**41.5** ±1 %.		**25.0** ±1 %.		**3.6** ±1 %.	
3300	-		-		-	
3500	**37.0**±1 %.		**26.4** ±1 %.		**3.6** ±1 %.	
3700	**34.7**±1 %.		**26.4** ±1 %.		**3.6** ±1 %.	
3900	-		-		-	
4200	-		-		-	
4600	-		-		-	
4900	-		-		-	

7 VALIDATION MEASUREMENT

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

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7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 ±10 %		0.87 ±10 %	
450	43.5 ±10 %		0.87 ±10 %	
750	41.9 ±10 %		0.89 ±10 %	
835	41.5 ±10 %	39.9	0.90 ±10 %	0.91
900	41.5 ±10 %		0.97 ±10 %	
1450	40.5 ±10 %		1.20 ±10 %	
1500	40.4 ±10 %		1.23 ±10 %	
1640	40.2 ±10 %		1.31 ±10 %	
1750	40.1 ±10 %		1.37 ±10 %	
1800	40.0 ±10 %		1.40 ±10 %	
1900	40.0 ±10 %		1.40 ±10 %	
1950	40.0 ±10 %		1.40 ±10 %	
2000	40.0 ±10 %		1.40 ±10 %	
2100	39.8 ±10 %		1.49 ±10 %	
2300	39.5 ±10 %		1.67 ±10 %	
2450	39.2 ±10 %		1.80 ±10 %	
2600	39.0 ±10 %		1.96 ±10 %	
3000	38.5 ±10 %		2.40 ±10 %	
3300	38.2 ±10 %		2.71 ±10 %	
3500	37.9 ±10 %		2.91 ±10 %	
3700	37.7 ±10 %		3.12 ±10 %	
3900	37.5 ±10 %		3.32 ±10 %	
4200	37.1 ±10 %		3.63 ±10 %	
4600	36.7 ±10 %		4.04 ±10 %	
4900	36.3 ±10 %		4.35 ±10 %	

7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

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

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.9.24.BES.A

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Head Liquid Values: eps' : 39.9 sigma : 0.91
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	835 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56	10.01 (1.00)	6.22	6.32 (0.63)
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	
1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3300	-		-	
3500	67.1		25	
3700	67.4		24.2	
3900	-		-	
4200	-		-	
4600	-		-	
4900	-		-	

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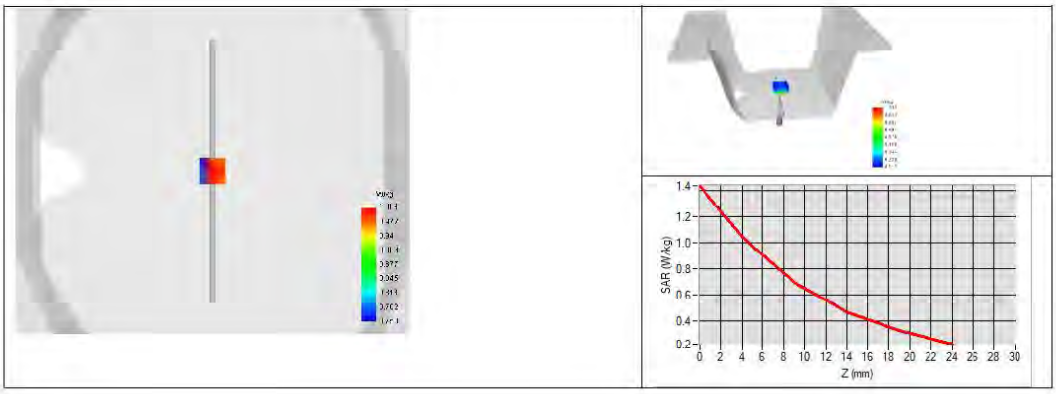
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.9.24.BES.A



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7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 ±10 %		0.80 ±10 %	
300	58.2 ±10 %		0.92 ±10 %	
450	56.7 ±10 %		0.94 ±10 %	
750	55.5 ±10 %		0.96 ±10 %	
835	55.2 ±10 %	52.3	0.97 ±10 %	0.94
900	55.0 ±10 %		1.05 ±10 %	
915	55.0 ±10 %		1.06 ±10 %	
1450	54.0 ±10 %		1.30 ±10 %	
1610	53.8 ±10 %		1.40 ±10 %	
1800	53.3 ±10 %		1.52 ±10 %	
1900	53.3 ±10 %		1.52 ±10 %	
2000	53.3 ±10 %		1.52 ±10 %	
2100	53.2 ±10 %		1.62 ±10 %	
2300	52.9 ±10 %		1.81 ±10 %	
2450	52.7 ±10 %		1.95 ±10 %	
2600	52.5 ±10 %		2.16 ±10 %	
3000	52.0 ±10 %		2.73 ±10 %	
3300	51.6 ±10 %		3.08 ±10 %	
3500	51.3 ±10 %		3.31 ±10 %	
3700	51.0 ±10 %		3.55 ±10 %	
3900	50.8 ±10 %		3.78 ±10 %	
4200	50.4 ±10 %		4.13 ±10 %	
4600	49.8 ±10 %		4.60 ±10 %	
4900	49.4 ±10 %		4.95 ±10 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
5800	48.2 ±10 %		6.00 ±10 %	

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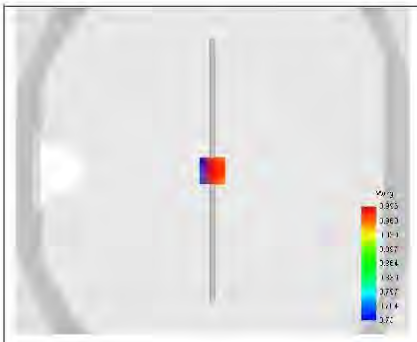
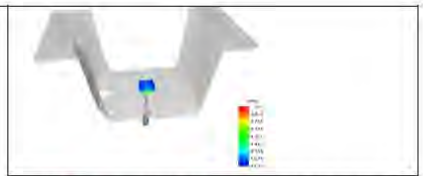
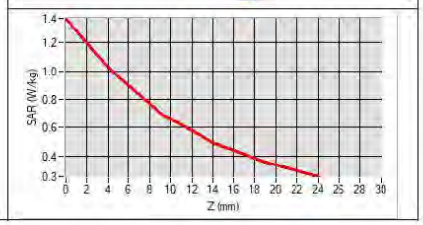
7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Body Liquid Values: eps' : 52.3 sigma : 0.94
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	835 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	**1 g SAR** (W/kg/W)	**10 g SAR** (W/kg/W)
	measured	measured
835	9.70 (0.97)	6.32 (0.63)







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8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Descriptio	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2024	08/2027
Network Analyzer	Agilent 8753ES	MY40003210	10/2022	10/2025
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	05/2022	05/2025
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Calipers	Mitutoyo	SN 0009732	10/2022	10/2025
Reference Probe	MVG	SN 41/18 EPGO333	10/2022	10/2025
Multimeter	Keithley 2000	1160271	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	04/2022	04/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2024	06/2027
Power Meter	Rohde & Schwarz NRVD	832839-056	11/2022	11/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2024	06/2027

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SAR Reference Dipole Calibration Report

Ref : ACR.329.12.24.BES.A

SHENZHEN BCTC TECHNOLOGY CO., LTD.
1 ~2/ F, NO. B FACTORY BUILDING, PENGZHOU INDUSTRIAL PARK, FUYUAN 1ST ROAD, TANGWEI COMMUNITY, FUHAI STREET, BAO'AN DISTRICT, SHENZHEN, GUANGDONG,CHINA

MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 1900 MHZ
SERIAL NO.: SN 47/21 DIP 1G900-624

Calibrated at MVG
Z.I. de la pointe du diable
Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE

Calibration date: 11/25/2024

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

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Summary:

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

Page: 1/13

SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.12.24.BES.A

	Name	*Function*	*Date*	*Signature*
Prepared by :	Jérôme Luc	Technical Manager	11/25/2024	JS
Checked by :	Jérôme Luc	Technical Manager	11/25/2024	JS
Approved by :	Yann Toutain	Laboratory Director	11/25/2024	Yann TOUTAIN 2024.11.25 11:54:31 +01'00'

	Customer Name
Distribution :	Shenzhen BCTC Technology Co., Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Jérôme Luc	11/25/2024	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

2 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR 1900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1900
Serial Number	SN 47/21 DIP 1G900-624
Product Condition (new / used)	New

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only.

Figure 1 – *MVG COMOSAR Validation Dipole*

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4 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

4.1 RETURN LOSS REQUIREMENTS

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

4.2 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness. A direct method is used with a ISO17025 calibrated caliper.

5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.08 LIN

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
0 - 300	0.20 mm
300 - 450	0.44 mm

5.3 VALIDATION MEASUREMENT

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

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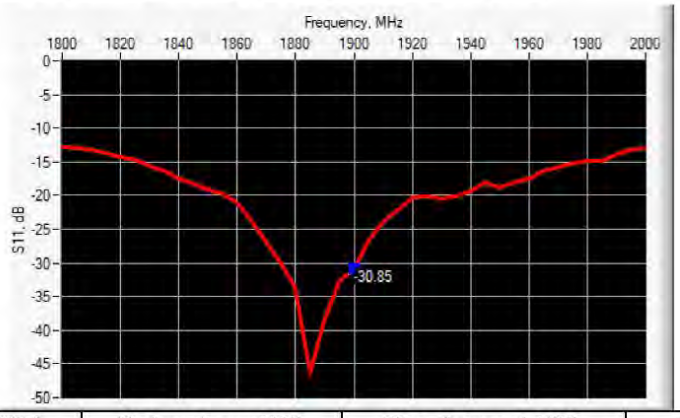
Scan Volume	Expanded Uncertainty
1 g	19 % (SAR)
10 g	19 % (SAR)

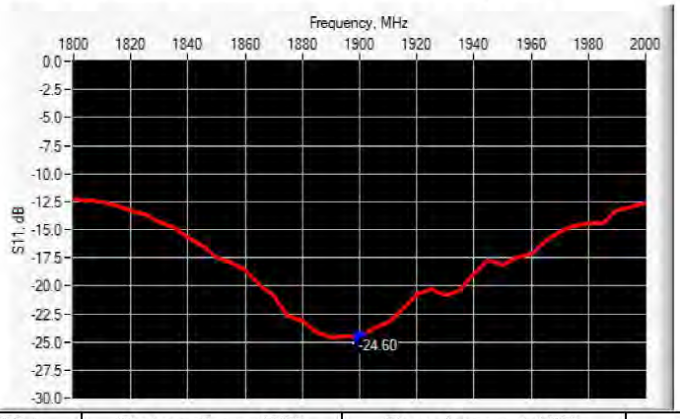
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-30.85	-20	51.9 Ω + 2.2 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-24.60	-20	45.9 Ω + 4.2 jΩ

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6.3 MECHANICAL DIMENSIONS

Frequency MHz	L mm		h mm		d mm	
	required	measured	required	measured	required	measured
300	**420.0** ±1 %.		**250.0** ±1 %.		**6.35** ±1 %.	
450	**290.0** ±1 %.		**166.7** ±1 %.		**6.35** ±1 %.	
750	**176.0** ±1 %.		**100.0** ±1 %.		**6.35** ±1 %.	
835	**161.0** ±1 %.		**89.8** ±1 %.		**3.6** ±1 %.	
900	**149.0** ±1 %.		**83.3** ±1 %.		**3.6** ±1 %.	
1450	**89.1** ±1 %.		**51.7** ±1 %.		**3.6** ±1 %.	
1500	**86.2** ±1 %.		**50.0** ±1 %.		**3.6** ±1 %.	
1640	**79.0** ±1 %.		**45.7** ±1 %.		**3.6** ±1 %.	
1750	**75.2** ±1 %.		**42.9** ±1 %.		**3.6** ±1 %.	
1800	**72.0** ±1 %.		**41.7** ±1 %.		**3.6** ±1 %.	
1900	**68.0** ±1 %.	67.97	**39.5** ±1 %.	39.61	**3.6** ±1 %.	3.60
1950	**66.3** ±1 %.		**38.5** ±1 %.		**3.6** ±1 %.	
2000	**64.5** ±1 %.		**37.5** ±1 %.		**3.6** ±1 %.	
2100	**61.0** ±1 %.		**35.7** ±1 %.		**3.6** ±1 %.	
2300	**55.5** ±1 %.		**32.6** ±1 %.		**3.6** ±1 %.	
2450	**51.5** ±1 %.		**30.4** ±1 %.		**3.6** ±1 %.	
2600	**48.5** ±1 %.		**28.8** ±1 %.		**3.6** ±1 %.	
3000	**41.5** ±1 %.		**25.0** ±1 %.		**3.6** ±1 %.	
3300	-		-		-	
3500	**37.0**±1 %.		**26.4** ±1 %.		**3.6** ±1 %.	
3700	**34.7**±1 %.		**26.4** ±1 %.		**3.6** ±1 %.	
3900	-		-		-	
4200	-		-		-	
4600	-		-		-	
4900	-		-		-	

7 VALIDATION MEASUREMENT

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

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7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
300	45.3 ±10 %		0.87 ±10 %	
450	43.5 ±10 %		0.87 ±10 %	
750	41.9 ±10 %		0.89 ±10 %	
835	41.5 ±10 %		0.90 ±10 %	
900	41.5 ±10 %		0.97 ±10 %	
1450	40.5 ±10 %		1.20 ±10 %	
1500	40.4 ±10 %		1.23 ±10 %	
1640	40.2 ±10 %		1.31 ±10 %	
1750	40.1 ±10 %		1.37 ±10 %	
1800	40.0 ±10 %		1.40 ±10 %	
1900	40.0 ±10 %	37.9	1.40 ±10 %	1.43
1950	40.0 ±10 %		1.40 ±10 %	
2000	40.0 ±10 %		1.40 ±10 %	
2100	39.8 ±10 %		1.49 ±10 %	
2300	39.5 ±10 %		1.67 ±10 %	
2450	39.2 ±10 %		1.80 ±10 %	
2600	39.0 ±10 %		1.96 ±10 %	
3000	38.5 ±10 %		2.40 ±10 %	
3300	38.2 ±10 %		2.71 ±10 %	
3500	37.9 ±10 %		2.91 ±10 %	
3700	37.7 ±10 %		3.12 ±10 %	
3900	37.5 ±10 %		3.32 ±10 %	
4200	37.1 ±10 %		3.63 ±10 %	
4600	36.7 ±10 %		4.04 ±10 %	
4900	36.3 ±10 %		4.35 ±10 %	

7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

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

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SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.12.24.BES.A

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Head Liquid Values: eps' : 37.9 sigma : 1.43
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	
1900	39.7	41.26 (4.13)	20.5	20.94 (2.09)
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3300	-		-	
3500	67.1		25	
3700	67.4		24.2	
3900	-		-	
4200	-		-	
4600	-		-	
4900	-		-	

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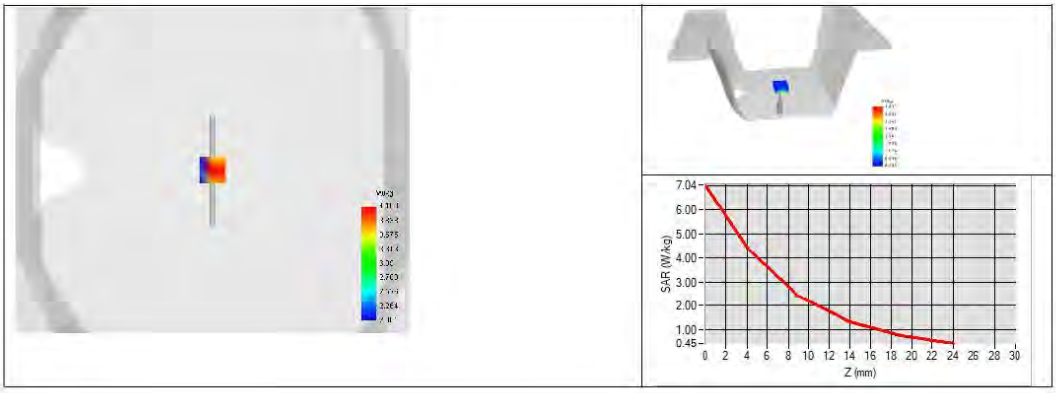
SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.329.12.24.BES.A



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7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 ±10 %		0.80 ±10 %	
300	58.2 ±10 %		0.92 ±10 %	
450	56.7 ±10 %		0.94 ±10 %	
750	55.5 ±10 %		0.96 ±10 %	
835	55.2 ±10 %		0.97 ±10 %	
900	55.0 ±10 %		1.05 ±10 %	
915	55.0 ±10 %		1.06 ±10 %	
1450	54.0 ±10 %		1.30 ±10 %	
1610	53.8 ±10 %		1.40 ±10 %	
1800	53.3 ±10 %		1.52 ±10 %	
1900	53.3 ±10 %	55.0	1.52 ±10 %	1.57
2000	53.3 ±10 %		1.52 ±10 %	
2100	53.2 ±10 %		1.62 ±10 %	
2300	52.9 ±10 %		1.81 ±10 %	
2450	52.7 ±10 %		1.95 ±10 %	
2600	52.5 ±10 %		2.16 ±10 %	
3000	52.0 ±10 %		2.73 ±10 %	
3300	51.6 ±10 %		3.08 ±10 %	
3500	51.3 ±10 %		3.31 ±10 %	
3700	51.0 ±10 %		3.55 ±10 %	
3900	50.8 ±10 %		3.78 ±10 %	
4200	50.4 ±10 %		4.13 ±10 %	
4600	49.8 ±10 %		4.60 ±10 %	
4900	49.4 ±10 %		4.95 ±10 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
5800	48.2 ±10 %		6.00 ±10 %	

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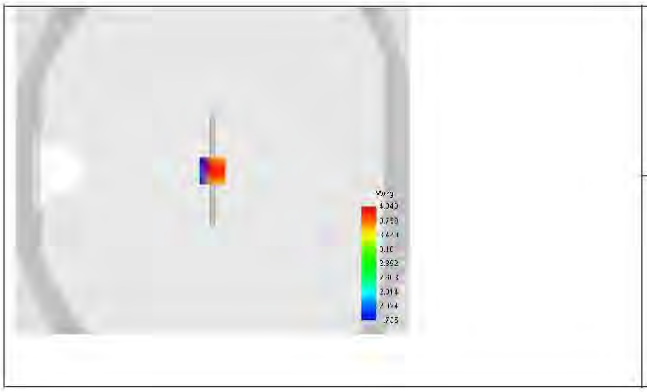
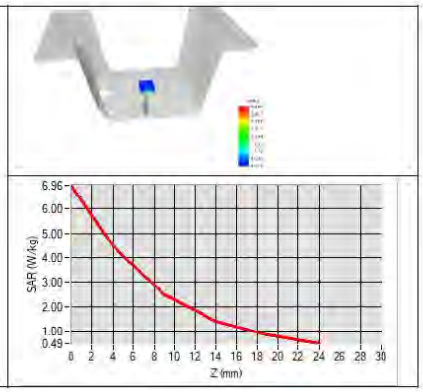
7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Body Liquid Values: eps' : 55.0 sigma : 1.57
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	**1 g SAR** (W/kg/W)	**10 g SAR** (W/kg/W)
	measured	measured
1900	40.66 (4.07)	20.57 (2.06)





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8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Descriptio	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN 13/09 SAM68	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2024	08/2027
Network Analyzer	Agilent 8753ES	MY40003210	10/2022	10/2025
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	05/2022	05/2025
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Calipers	Mitutoyo	SN 0009732	10/2022	10/2025
Reference Probe	MVG	SN 41/18 EPGO333	10/2024	10/2025
Multimeter	Keithley 2000	1160271	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	04/2022	04/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2024	06/2027
Power Meter	Rohde & Schwarz NRVD	832839-056	11/2022	11/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2024	06/2027

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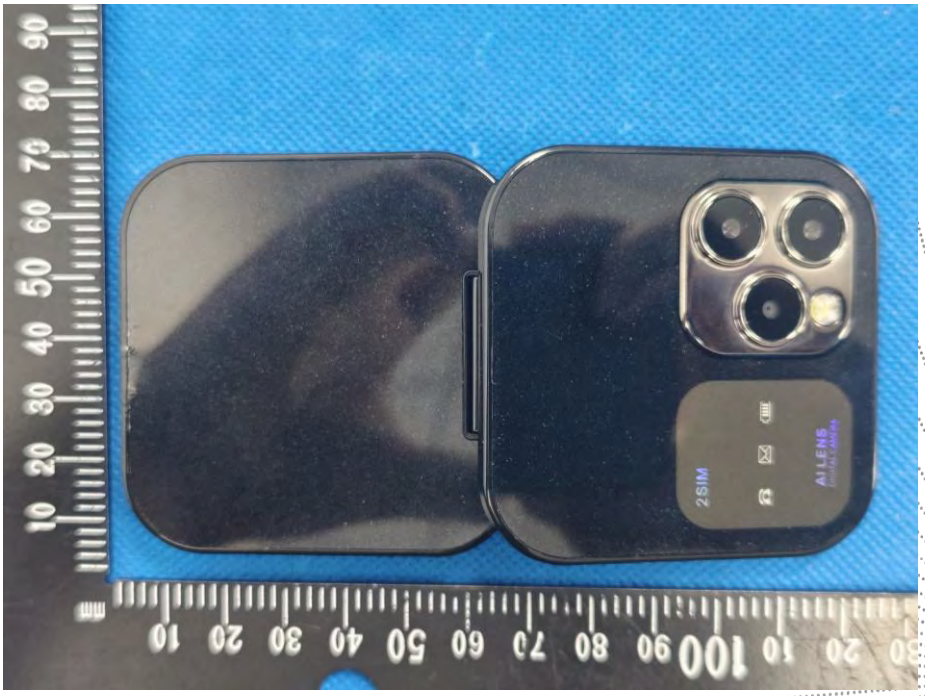
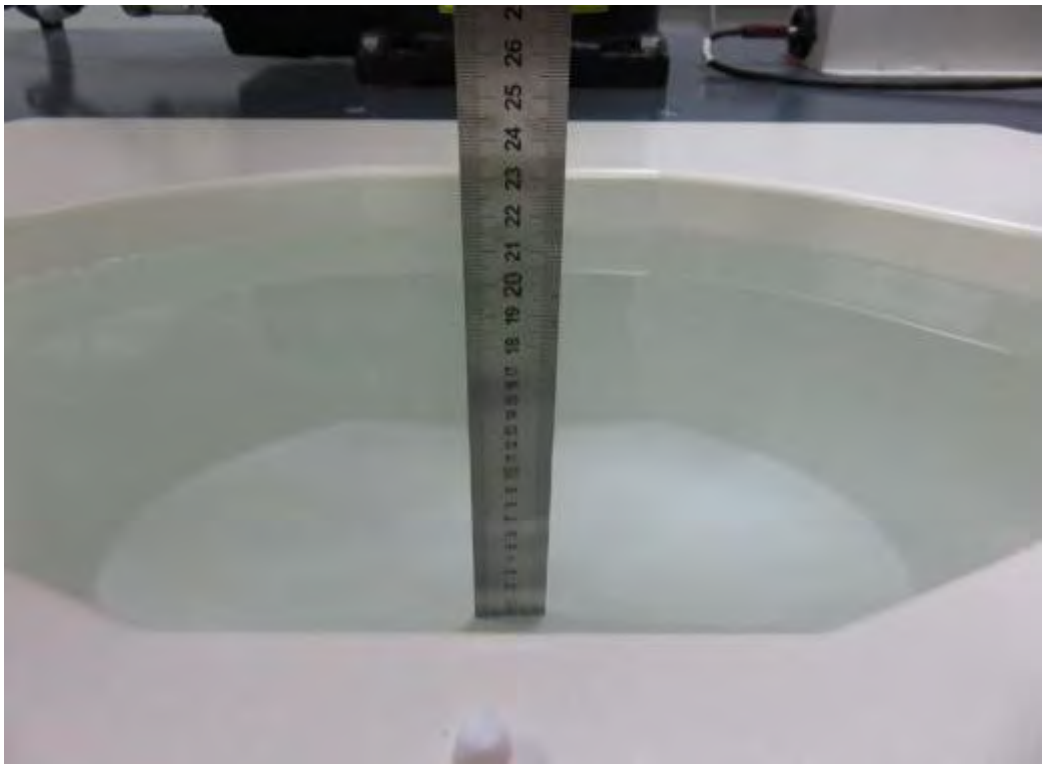
17. EUT Photographs

EUT Front View

EUT Back View



18. Photographs Of The Liquid

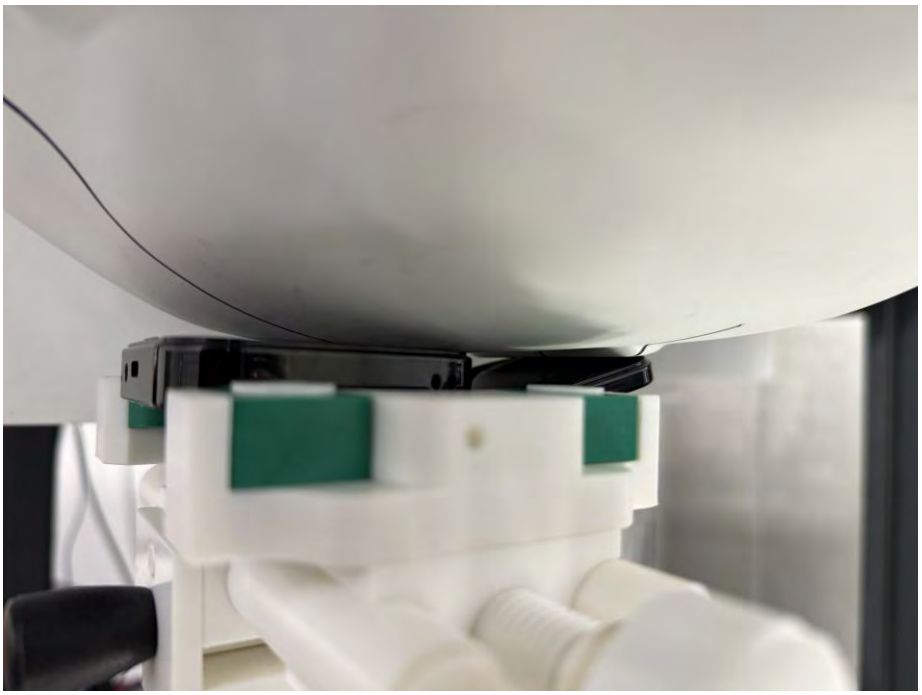


Photograph of the depth in the Body Phantom (600-10000MHz, depth >15cm)

19. EUT Test Setup Photographs

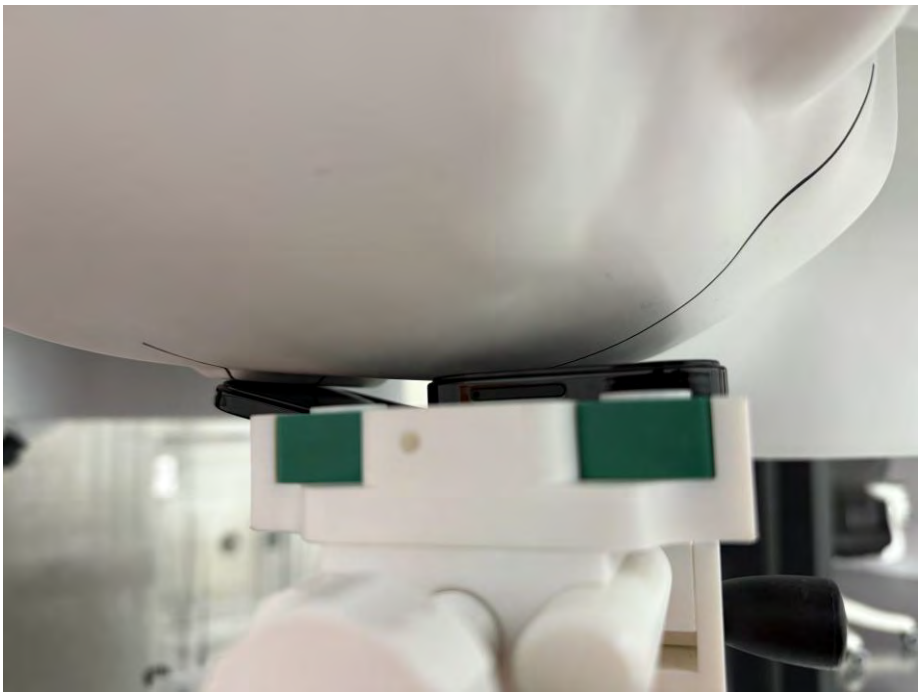
Head mode Exposure Conditions

Left Cheek

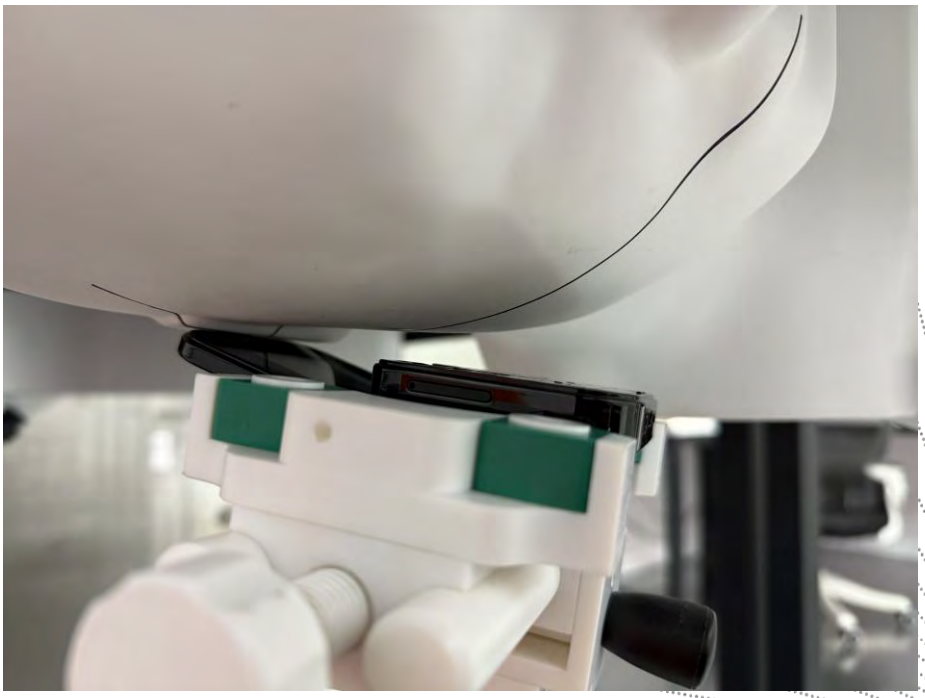


Left Tilt

Right Cheek

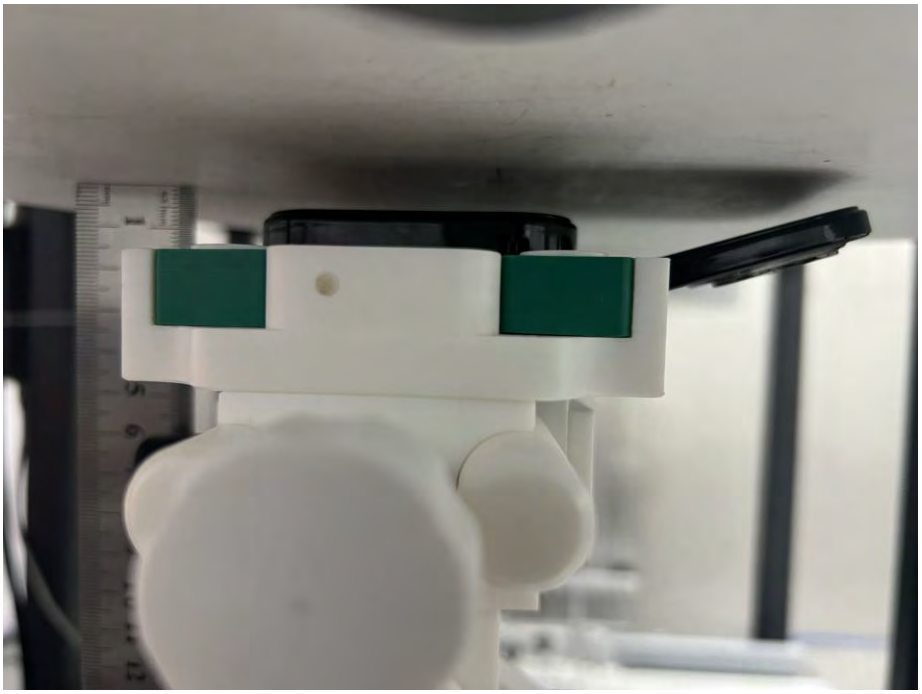


Right Tilt

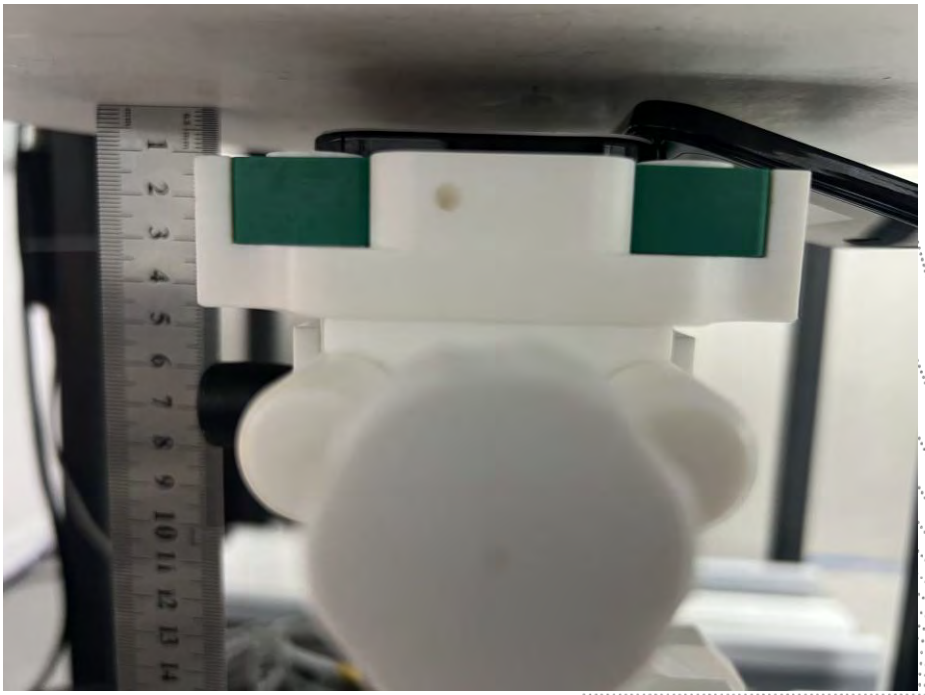


Body mode Exposure Conditions
Test distance: 5mm

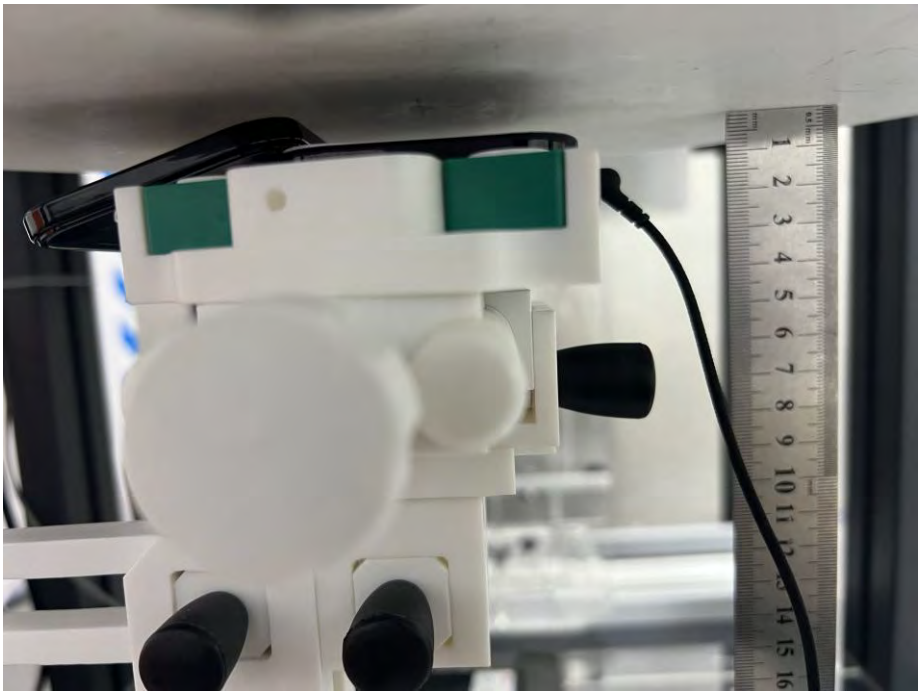
Front



Back



Back - with headphones



Right

Bottom

STATEMENT

1. The equipment lists are traceable to the national reference standards.

2. The test report can not be partially copied unless prior written approval is issued from our lab.

3. The test report is invalid without the "special seal for inspection and testing".

4. The test report is invalid without the signature of the approver.

5. The test process and test result is only related to the Unit Under Test.

6. Sample information is provided by the client and the laboratory is not responsible for its authenticity.

7. The quality system of our laboratory is in accordance with ISO/IEC17025.

8. If there is any objection to this test report, the client should inform issuing laboratory within 15 days from the date of receiving test report.

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Complaint/Advice E-mail: advice@bctc-lab.com.cn

※※※※※ END ※※※※※