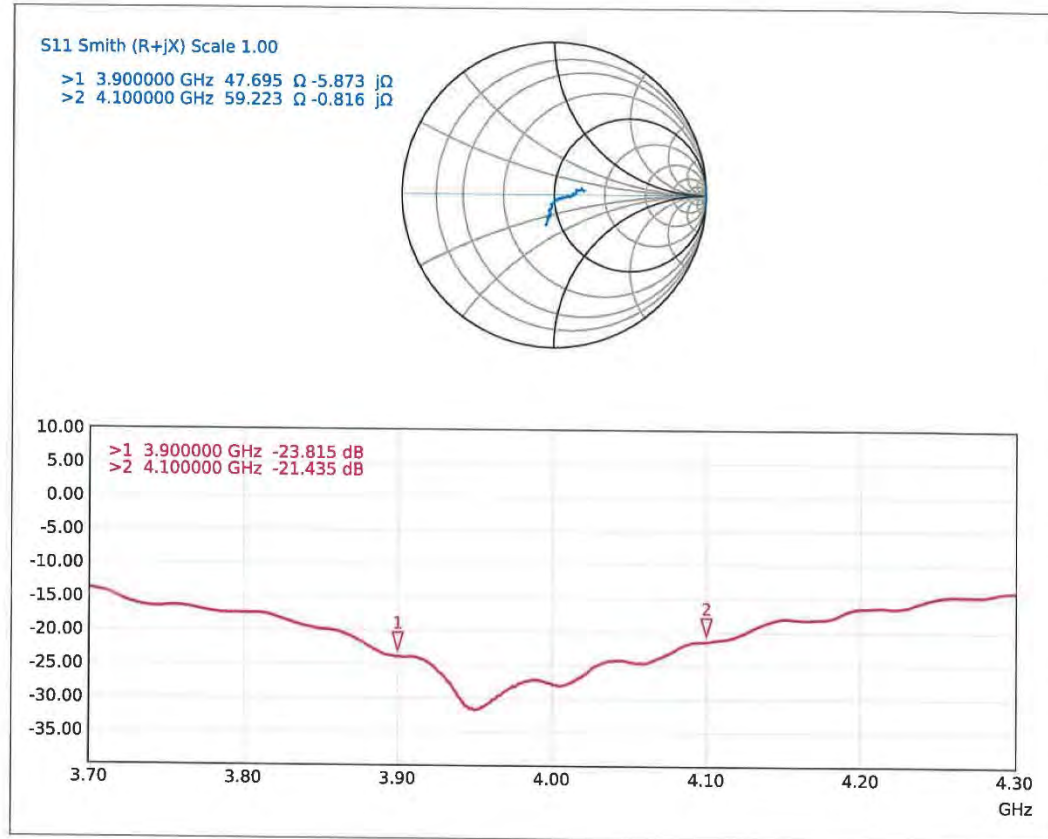


D3900V2 - SN: 1037

January 21, 2026

Impedance Measurement Plot for HSL



APPENDIX C. – SAR Tissue Specifications

The brain and muscle mixtures consist of a viscous gel using hydrox-ethylcellulose (HEC) gelling agent and saline solution (see Table 3.1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Harts grove.



Figure 3.9 Simulated Tissue

Table C.1 Composition of the Tissue Equivalent Matter

Ingredients (% by weight)	Frequency (MHz)							
	835		1 900		2 450		5 200 ~ 5 800	
Tissue Type	Head	Body	Head	Body	Head	Body	Head	Body
Water	40.19	50.75	55.24	70.23	71.88	73.40	65.52	80.00
Salt (NaCl)	1.480	0.940	0.310	0.290	0.160	0.060	-	-
Sugar	57.90	48.21	-	-	-	-	-	-
HEC	0.250	-	-	-	-	-	-	-
Bactericide	0.180	0.100	-	-	-	-	-	-
Triton X-100	-	-	-	-	19.97	-	17.24	-
DGBE	-	-	44.45	29.48	7.990	26.54	-	-
Diethylene glycol hexyl ether	-	-	-	-	-	-	17.24	-
Polysorbate (Tween) 80	-	-	-	-	-	-		20.00
Target for Dielectric Constant	41.5	55.2	40.0	53.3	39.2	52.7	-	-
Target for Conductivity (S/m)	0.90	0.97	1.40	1.52	1.80	1.95	-	-

Salt:	99 % Pure Sodium Chloride	Sugar:	98 % Pure Sucrose
Water:	De-ionized, 16M resistivity	HEC:	Hydroxyethyl Cellulose
DGBE:	99 % Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy) ethanol]		
Triton X-100(ultra pure):	Polyethylene glycol mono[4-(1,1,3,3-tetramethylbutyl)phenyl] ether		

Table C.2 HSL/MSL750 (Head and Body liquids for 700 – 800 MHz)

Item	Head Tissue Simulation Liquids HSL750
	Muscle (body) Tissue Simulation Liquids MSL750
Type No	SL AAH 075, SL AAM 075
Manufacturer	SPEAG
The item is composed of the following ingredients:	
H ₂ O	Water, 35 – 58%
Sucrose	Sucrose, 40 – 60%
NaCl	Sodium Chloride, 0 – 6%
Hydroxyethyl-cellulose	Medium Viscosity (CAS# 9004-62-0), < 0.3%
Preventol-D7	Preservative: aqueous preparation, (CAS# 55965-84-9), containing 5-chloro-2-methyl-3(2H)-isothiazolone and 2-methyl-3(2H)-isothiazolone, 0.1 – 0.6%

Table C.3 HSL/MSL1750 (Head and Body liquids for 1 700 – 1 800 MHz)

Item	Head Tissue Simulation Liquids HSL1750
	Muscle (body) Tissue Simulation Liquids MSL1750
Type No	SL AAH 175, SL AAM 175
Manufacturer	SPEAG
The item is composed of the following ingredients:	
H ₂ O	Water, 52 – 75%
C ₈ H ₁₈ O ₃	Diethylene glycol monobutyl ether (DGBE), 25 – 48%
NaCl	Sodium Chloride, < 1.0%

APPENDIX D. – SAR SYSTEM VALIDATION

SAR System Validation

Per FCC KDB 865664 D02v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue- equivalent media for system validation, according to the procedures outlined in FCC KDB 865664 D01v01r04. Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point, using the system that normally operates with the probe for routine SAR measurements and according to the required tissue-equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table D.1 SAR System Validation Summary

SAR System	Freq. [MHz]	Date	Probe SN	Probe Type	Probe CAL. Point		PERM.	COND.	CW Validation			MOD. Validation		
							(ϵ_r)	(σ)	Sensi- tivity	Probe Linearity	Probe Isortopy	MOD. Type	Duty Factor	PAR
B	750	2025.12.03	7898	EX3DV4	750	Head	41.020	0.916	PASS	PASS	PASS	N/A	N/A	N/A
B	835	2025.12.03	7898	EX3DV4	835	Head	40.890	0.918	PASS	PASS	PASS	GMSK	PASS	N/A
B	1 800	2025.12.04	7898	EX3DV4	1 800	Head	40.028	1.402	PASS	PASS	PASS	N/A	N/A	N/A
B	1 900	2025.12.04	7898	EX3DV4	1 900	Head	39.661	1.444	PASS	PASS	PASS	GMSK	PASS	N/A
B	2 600	2025.12.05	7898	EX3DV4	2 600	Head	38.576	1.993	PASS	PASS	PASS	TDD	PASS	N/A
B	3 500	2025.06.12	3866	EX3DV4	3 500	Head	38.313	2.942	PASS	PASS	PASS	TDD	PASS	N/A
B	3 500	2026.04.16	3916	EX3DV4	3 500	Head	36.987	2.834	PASS	PASS	PASS	TDD	PASS	N/A
B	3 700	2025.06.12	3866	EX3DV4	3 700	Head	38.246	3.165	PASS	PASS	PASS	TDD	PASS	N/A
B	3 700	2026.04.16	3916	EX3DV4	3 700	Head	36.844	3.028	PASS	PASS	PASS	TDD	PASS	N/A
B	3 900	2025.06.12	3866	EX3DV4	3 900	Head	38.219	3.381	PASS	PASS	PASS	TDD	PASS	N/A
B	3 900	2026.04.16	3916	EX3DV4	3 900	Head	36.798	3.219	PASS	PASS	PASS	TDD	PASS	N/A

NOTE: While the probes have been calibrated for both a CW and modulated signals, all measurements were performed using communication systems calibrated for CW signals only. Modulations in the table above represent test configurations for which the measurement system has been validated per FCC KDB Publication 865664 D01v01r04 for scenarios when CW probe calibrations are used with other signal types. SAR systems were validated for modulated signals with a periodic duty cycle, such as GMSK, or with a high peak to average ratio (>5 dB), such as OFDM according to KDB 865664.

APPENDIX E. – Description of Test Equipment

E.1 SAR Measurement Setup

Measurements are performed using the DASY5 automated dosimetric assessment system. The DASY5 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. E.1.1).

A cell controller system contains the power supply, robot controller each pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Intel Xeon W-2 253 3.70 GHz desktop computer with Windows 11 Professional system and SAR Measurement Software DASY5, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

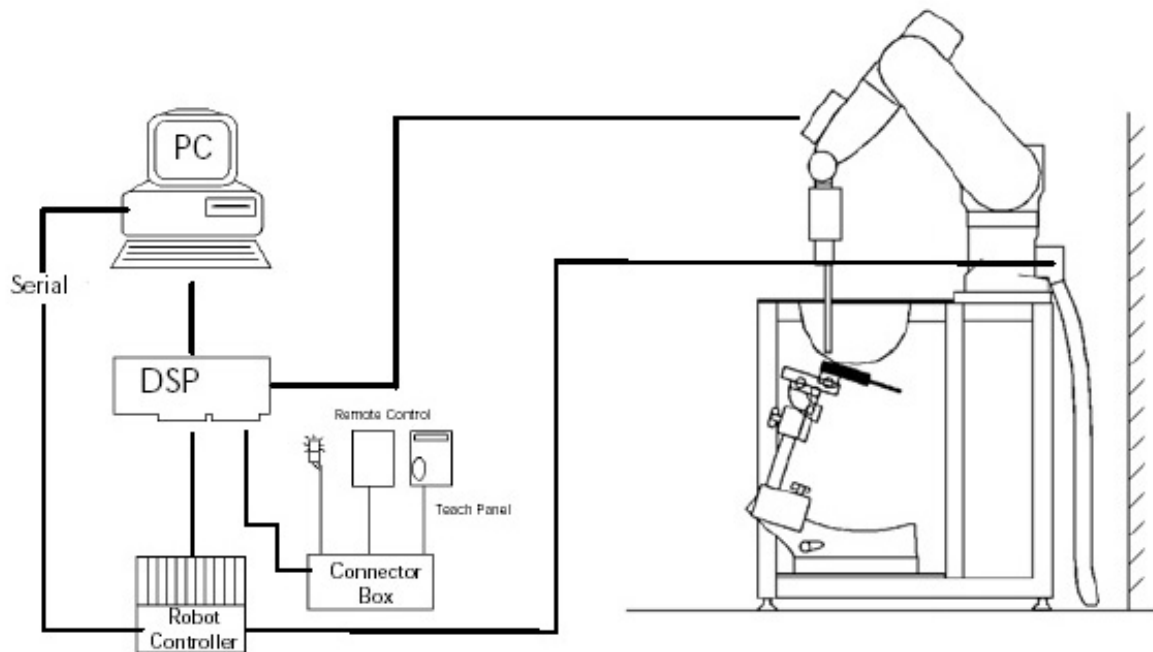


Figure E.1.1 SAR Measurement System Setup

The DAE3/4 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail.

E.2 Probe Specification

Frequency	4 MHz to 10 GHz
Linearity	±0.2 dB(30 MHz to 10 GHz)
Dynamic	10 μW/g to > 100 mW/g
Range	Linearity : ±0.2 dB
Dimensions	Overall length : 337 mm
Tip length	20 mm
Body diameter	12 mm
Tip diameter	32.5 mm
Distance from probe tip to sensor center	2.5 mm
Application	SAR Dosimetry Testing Compliance tests of mobile phones

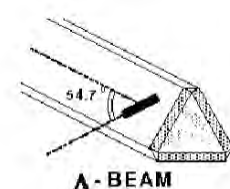


Figure E.2.1 Triangular Probe Configurations



Figure E.2.2 Probe Thick-Film Technique



DAE System

The SAR measurements were conducted with the dosimetric probe EX3DV4 designed in the classical triangular configuration (see E.2.1) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multitier line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY5 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.

E.3 E-Probe Calibration Process

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy was evaluated with the procedure and found to be better than ± 0.25 dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

Temperature Assessment *

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium, correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent the remits or 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.

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

where:

σ = simulated tissue conductivity,

ρ = Tissue density (1.25 g/cm³ for brain tissue)

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

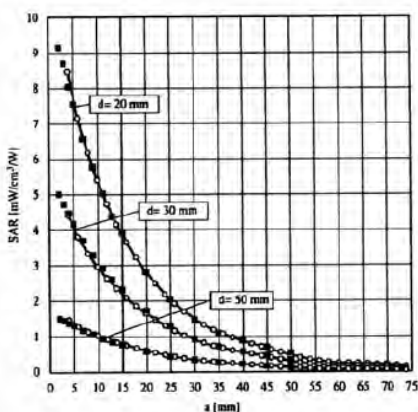


Figure E.3.1 E-Field and Temperature Measurements at 900MHz

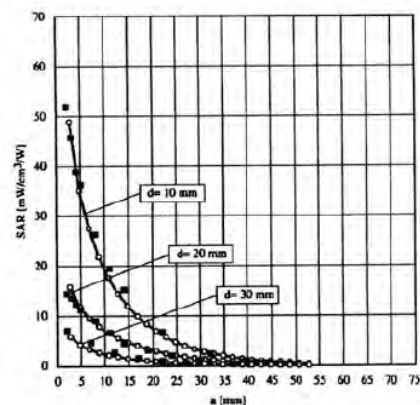


Figure E.3.2 E-Field and Temperature Measurements at 1 800MHz

E.4 Data Extrapolation

The DASY5 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i (i=x,y,z)
 U_i = input signal of channel i (i=x,y,z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

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

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with V_i = compensated signal of channel i (i = x,y,z)
 $Norm_i$ = sensor sensitivity of channel i (i = x,y,z)
 $\mu V/(V/m)^2$ for E-field probes
 $ConvF$ = sensitivity of enhancement in solution
 E_i = electric field strength of channel i in V/m

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

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with SAR = local specific absorption rate in W/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{free} = \frac{E_{tot}^2}{3770}$$

with P_{pwe} = equivalent power density of a plane wave in W/cm²
 E_{tot} = total electric field strength in V/m

E.5 SAM Twin Phantom

The SAM Twin Phantom V5.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90% of all users. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid.

Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. E.5.1)



Figure E.5.1 SAM Twin Phantom

SAM Twin Phantom Specification:

Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot. Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.
Shell Thickness	(2 ± 0.2) mm
Filling Volume	Approx. 25 liters
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet

Specific Anthropomorphic Mannequin (SAM) Specifications:

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. E.5.2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.



Figure E.5.2 Sam Twin Phantom shell

E.6 ELI PHANTOM

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid.

Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles. ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure. (see Fig. F.5.1)

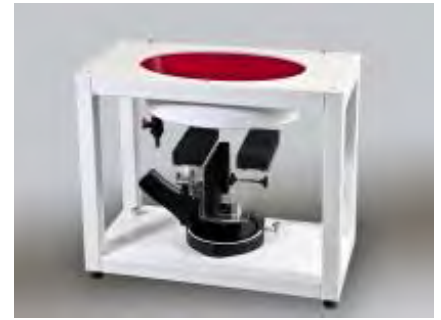


Figure E.6.1 ELI Phantom

ELI Phantom Specification

Shell Thickness	(2.0 ± 0.2) mm (bottom plate)
Dimensions	Major axis: 600 mm, Minor: 400 mm
Filling Volume	Approx. 30 liters

E.7 Device Holder for Transmitters

In combination with the Twin SAM Phantom V4.0/V4.0c, V5.0 or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.



Figure E.7.1 Mounting Device

E.8 Automated Test System Specifications

Positioner

Robot	Stäubli Unimation Corp. Robot Model: TX60L
Repeatability	0.02 mm
No. of axis	6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor	Intel Xeon W-2 253
Clock Speed	3.70 GHz
Operating System	Windows 11 Professional
Data Card	DASY6 PC-Board

Data Converter

Features	Signal, multiplexer, A/D converter. & control logic
Software	DASY6
Connecting Lines	Optical downlink for data and status info Optical uplink for commands and clock

PC Interface Card

Function	24 bit (64 MHz) DSP for real time processing Link to DAE 3/4 16 bit A/D converter for surface detection system serial link to robot direct emergency stop output for robot
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E-Field Probes

Model	EX3DV4 S/N: 7898/3866/3916
Construction	Triangular core fiber optic detection system
Frequency	4 MHz to 10 GHz
Linearity	± 0.2 dB (30 MHz to 10 GHz)

Phantom

Phantom	SAM Twin Phantom (V5.0) / ELI Phantom (V6.0)
Shell Material	Composite
Thickness	(2.0 ± 0.2) mm



Figure E.8.1 DASY5 Test System

-End-