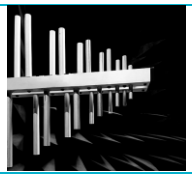
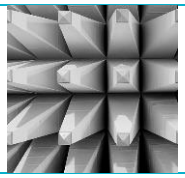

CTC advanced
member of RWTÜV group

Bundesnetzagentur

TEST REPORT

Test Report No.: 1-7958/19-01-06

DAkkS Deutsche Akkreditierungsstelle D-PL-12076-01-03

BNetzA-CAB-02/21-102

Testing Laboratory

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Accredited Test Laboratory:
The testing laboratory (area of testing) is accredited according to DIN EN ISO/IEC 17025 (2005) by the Deutsche Akkreditierungsstelle GmbH (DAkkS)
The accreditation is valid for the scope of testing procedures as stated in the accreditation certificate with the registration number: D-PL-12076-01-03

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Test Standards

IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
RSS-102 Issue 5	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)

For further applied test standards please refer to section 3 of this test report.

Test Item

Kind of test item:	UPCS Headset
Device type:	portable device
Model name:	**S7220T; S7220T/A; S7210T/A; S7210T**
S/N serial number:	00WAUH
FCC-ID:	AL8-S72XXT
ISED:	457A-S72XXT
Product Marketing Name (PMN):	S7210T; S7220T
Hardware Version Identification No. (HVIN):	S7210T; S7220T
Hardware status:	-/-
Software status:	-/-
Frequency:	see technical details
Antenna:	integrated antenna
Battery option:	Li-Ion battery 3.7V
Test sample status:	identical prototype
Exposure category:	general population / uncontrolled environment

This test report is electronically signed and valid without handwriting signature. For verification of the electronic signatures, the public keys can be requested at the testing laboratory.

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2 General information

2.1 Notes and disclaimer

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2.2 Application details

Date of receipt of order:	2019-02-07
Date of receipt of test item:	2019-04-30
Start of test:	2019-04-30
End of test:	2019-04-30

2.3 Statement of compliance

The SAR values found for the S7220T; S7220T/A; S7210T/A; S7210T UPCS Headset are below the maximum recommended levels of 1.6 W/Kg as averaged over any 1 g tissue according to the FCC rule §2.1093, the ANSI/IEEE C 95.1:1992, the NCRP Report Number 86 for uncontrolled environment, according to the Health Canada’s Safety Code 6 and the Industry Canada Radio Standards Specification RSS-102 for General Population/Uncontrolled exposure.

2.4 Technical details

Technology:	DECT (UPCS)
Frequency band:	1925 MHz
Lowest transmit/receive frequency/MHz:	1921.536 MHz
Highest transmit/receive frequency/MHz:	1928.448 MHz
Kind of modulation:	GFSK
Number of channels:	5 RF Channels, 5x12 = 60 TDMA Duplex Channels
Test channel low:	0 / 1928.448 MHz
Test channel middle:	2 / 1924.992 MHz
Test channel high:	4 / 1921.536 MHz
Maximum number of timeslots:	24
Maximum number of active timeslots:	1 (full slot – 416.7µs)
RF Power (max):	Conducted: 19.3 dBm, 85.1 mW
Averaged output power (full slot):	3.5 mW (5.5 dBm)

3 Test standards/ procedures references

Test Standard	Version	Test Standard Description
IEEE 1528-2013	2013-06	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
RSS-102 Issue 5	2015-03	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
Canada's Safety Code No. 6	2015-06	Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3 kHz to 300 GHz
IEEE Std. C95-3	2002	IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields – RF and Microwave
IEEE Std. C95-1	2005	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

FCC KDBs:

KDB 865664D01v01	August 7, 2015	FCC OET SAR measurement requirements 100 MHz to 6 GHz
KDB 865664D02v01	October 23, 2015	RF Exposure Compliance Reporting and Documentation Considerations
KDB 447498D01v06	October 23, 2015	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies

3.1 RF exposure limits

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

Table 1: RF exposure limits

The limit applied in this test report is shown in bold letters

Notes:

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

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

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

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

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

4 Summary of Measurement Results

☒	**No deviations from the technical specifications ascertained**
☐	Deviations from the technical specifications ascertained

Maximum SAR_{1g} value (W/kg)		
	reported	**limit**
head	**0.0075**	**1.6**

5 Test Environment

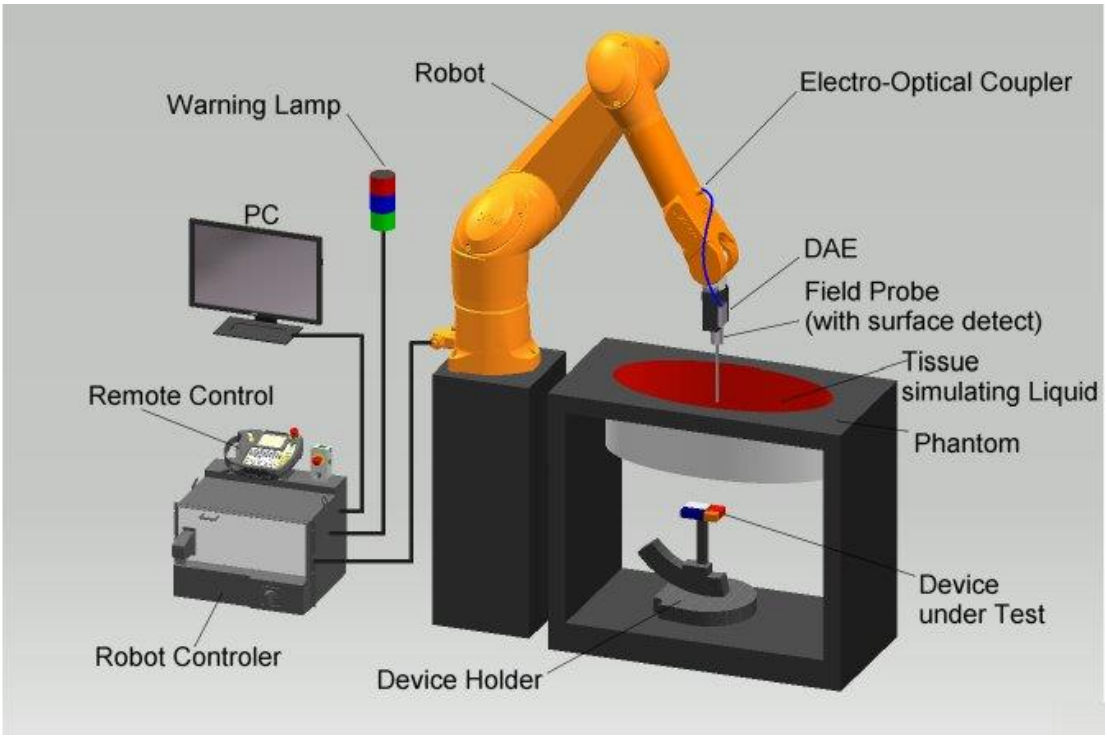
Ambient temperature:	20 – 24 °C
Tissue Simulating liquid:	20 – 24 °C
Relative humidity content:	40 – 50 %
Air pressure:	not relevant for this kind of testing
Power supply:	230 V / 50 Hz

Exact temperature values for each test are shown in the table(s) under 7.1 and/or on the measurement plots.

6 Test Set-up

6.1 Measurement system

6.1.1 System Description



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

- A standard high precision 6-axis robot (Stäubli RX/TX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).

- A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid.

- A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY measurement server.
- The DASY measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows 7.
- DASY software and SEMCAD data evaluation software.
- Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
- The generic twin phantom enabling the testing of left-hand and right-hand usage.
- The triple flat and eli phantom for the testing of handheld and body-mounted wireless devices.
- The device holder for handheld mobile phones and mounting device adaptor for laptops
- Tissue simulating liquid mixed according to the given recipes.
- System check dipoles allowing to validate the proper functioning of the system.

6.1.2 Test environment

The DASY measurement system is placed in a laboratory room within an environment which avoids influence on SAR measurements by ambient electromagnetic fields and any reflection from the environment. The pictures at the beginning of the photo documentation show a complete view of the test environment. The system allows the measurement of SAR values larger than 0.005 mW/g.

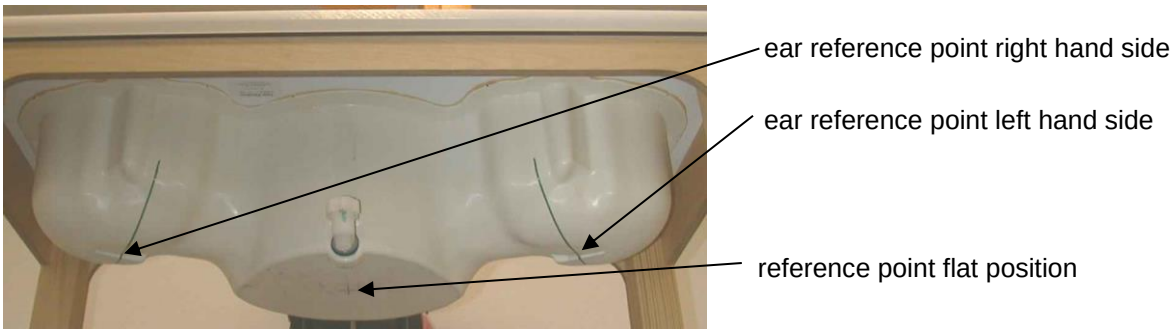
6.1.3 Probe description

Isotropic E-Field Probe ES3DV3 for Dosimetric Measurements	
Technical data according to manufacturer information	
Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., butyl diglycol)
Calibration	Calibration certificate in Appendix D
Frequency	10 MHz to 3 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 3 GHz)
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.3 dB in HSL (rotation normal to probe axis)
Dynamic range	5 µW/g to > 100 mW/g; Linearity: ± 0.2 dB
Dimensions	Overall length: 330 mm Tip length: 20 mm Body diameter: 12 mm Tip diameter: 3.9 mm Distance from probe tip to dipole centers: 2.0 mm
Application	General dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic scanning in arbitrary phantoms (ES3DV3)

Isotropic E-Field Probe EX3DV4 for Dosimetric Measurements	
Technical data according to manufacturer information	
Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	10 MHz to >6 GHz (dosimetry); Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic range	10 µW/g to > 100 mW/g; Linearity: ± 0.2 dB (noise: typically<1 µW/g)
Dimensions	Overall length: 337 mm (Tip: 20mm) Tip length: 2.5 mm (Body: 12mm) Typical distance from probe tip to dipole centers: 1mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.

6.1.4 Phantom description

The used SAM Phantom meets the requirements specified in FCC KDB865664 D01 for Specific Absorption Rate (SAR) measurements.
The phantom consists of a fibreglass shell integrated in a wooden table. It allows left-hand and right-hand head as well as body-worn measurements with a maximum liquid depth of 18 cm in head position and 22 cm in planar position (body measurements). The thickness of the Phantom shell is 2 mm +/- 0.1 mm.



Triple Modular Phantom consists of three identical modules which can be installed and removed separately without emptying the liquid. It includes three reference points for phantom installation. Covers prevent evaporation of the liquid. Phantom material is resistant to DGBE based tissue simulating liquids.

6.1.5 Device holder description

The DASY device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. This device holder is used for standard mobile phones or PDA's only. If necessary an additional support of polystyrene material is used.

Larger DUT's (e.g. notebooks) cannot be tested using this device holder. Instead a support of bigger polystyrene cubes and thin polystyrene plates is used to position the DUT in all relevant positions to find and measure spots with maximum SAR values.
Therefore those devices are normally only tested at the flat part of the SAM.

6.1.6 Scanning procedure

- The DASY installation includes predefined files with recommended procedures for measurements and system check. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.
- The „reference“ and „drift“ measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT's output power and should vary max. +/- 5 %.
- The highest integrated SAR value is the main concern in compliance test applications. These values can mostly be found at the inner surface of the phantom and cannot be measured directly due to the sensor offset in the probe. To extrapolate the surface values, the measurement distances to the surface must be known accurately. A distance error of 0.5mm could produce SAR errors of 6% at 1800 MHz. Using predefined locations for measurements is not accurate enough. Any shift of the phantom (e.g., slight deformations after filling it with liquid) would produce high uncertainties. For an automatic and accurate detection of the phantom surface, the DASY5 system uses the mechanical surface detection. The detection is always at touch, but the probe will move backward from the surface the indicated distance before starting the measurement.
- The „area scan“ measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The scan uses different grid spacings for different frequency measurements. Standard grid spacing for head measurements in frequency ranges ≤ 2GHz is 15 mm in x- and y-dimension. For higher frequencies a finer resolution is needed, thus for the grid spacing is reduced according the following table:

Area scan grid spacing for different frequency ranges	
Frequency range	Grid spacing
≤ 2 GHz	≤ 15 mm
2 – 4 GHz	≤ 12 mm
4 – 6 GHz	≤ 10 mm

Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation. Results of this coarse scan are shown in annex B.

- A „zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous „coarse“ scan. It uses a fine meshed grid where the robot moves the probe in steps along all the 3 axis (x, y and z-axis) starting at the bottom of the Phantom. The grid spacing for the cube measurement is varied according to the measured frequency range, the dimensions are given in the following table:

Zoom scan grid spacing and volume for different frequency ranges			
Frequency range	Grid spacing for x, y axis	Grid spacing for z axis	Minimum zoom scan volume
≤ 2 GHz	≤ 8 mm	≤ 5 mm	≥ 30 mm
2 – 3 GHz	≤ 5 mm*	≤ 5 mm	≥ 28 mm
3 – 4 GHz	≤ 5 mm*	≤ 4 mm	≥ 28 mm
4 – 5 GHz	≤ 4 mm*	≤ 3 mm	≥ 25 mm
5 – 6 GHz	≤ 4 mm*	≤ 2 mm	≥ 22 mm

* 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.

DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in annex B. Test results relevant for the specified standard (see section 3) are shown in table form in section 7.

6.1.7 Spatial Peak SAR Evaluation

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of all points in the three directions x, y and z. The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 1 to 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting 'Graph Evaluated'.

- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.

- All neighbouring volumes are evaluated until no neighbouring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computermathematik, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computermathematik, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

6.1.8 Data Storage and Evaluation

Data Storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension ".DA4", ".DA5x". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

Data Evaluation by SEMCAD

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

Probe parameters:	- Sensitivity	$Norm_i$, a_{i0}, a_{i1}, a_{i2}
	- Conversion factor	$ConvF_i$
	- Diode compression point	Dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	σ
	- Density	ρ

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

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

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

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

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

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

E-field probes: $$E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$$

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

with	V_i	= compensated signal of channel i	(i = x, y, z)
	$Norm_i$	= sensor sensitivity of channel i [mV/(V/m)^2] for E-field Probes	(i = x, y, z)
	ConvF	= sensitivity enhancement in solution	
	a_{ij}	= sensor sensitivity factors for H-field probes	
	f	= carrier frequency [GHz]	
	E_i	= electric field strength of channel i in V/m	
	H_i	= magnetic field strength of channel i in A/m	

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

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

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

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

with	SAR	= local specific absorption rate in mW/g
	E_{tot}	= total field strength in V/m
	σ	= conductivity in [mho/m] or [Siemens/m]
	ρ	= equivalent tissue density in g/cm^3

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

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

with	P_{pwe}	= equivalent power density of a plane wave in mW/cm^2
	E_{tot}	= total electric field strength in V/m
	H_{tot}	= total magnetic field strength in A/m

6.1.9 Tissue simulating liquids: dielectric properties

The following materials are used for producing the tissue-equivalent materials.

(Liquids used for tests described in section 7. are marked with ☒):

Ingredients (% of weight)	**Frequency (MHz)**								
frequency band	☐ 450	☐ 750	☐ 835	☐ 900	☐ 1450	☐ 1750	☒ 1900	☐ 2450	☐ 5000
Water	38.56	41.1	41.45	40.92	54.37	55.35	55.19	54.7	64 - 78
Salt (NaCl)	3.95	1.4	1.45	1.48	0.63	0.38	0.19	0.0	2 - 3
Sugar	56.32	57.0	56.0	56.5	0.0	0.0	0.0	0.0	0.0
HEC	0.98	0.2	1.0	1.0	0.0	0.0	0.0	0.0	0.0
Bactericide	0.19	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.0
Tween 20	0.0	0.0	0.0	0.0	44.90	44.17	44.52	45.2	0.0
Emulsifiers	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9 - 15
Mineral Oil	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	11 - 18

Table 2: Head tissue dielectric properties

Salt: 99+% Pure Sodium Chloride
Sugar: 98+% Pure Sucrose
Tween 20: Polyoxyethylene (20) sorbitan monolaurate
Water: De-ionized, 16MΩ+ resistivity
HEC: Hydroxyethyl Cellulose

6.1.10 Tissue simulating liquids: parameters

Liquid HSL	Freq. (MHz)	Target head tissue		Measurement **head** tissue					Measurement date
		Permittivity	Conductivity (S/m)	Permittivity	Dev.	Conductivity ε"	Conductivity (S/m)	Dev.	
1900	1900	40.00	1.40	40.3	0.8%	13.04	1.38	-1.6%	2019-04-30
	1922	40.00	1.40	40.3	0.7%	12.97	1.39	-1.0%	
	1925	40.00	1.40	40.3	0.7%	12.98	1.39	-0.7%	
	1929	40.00	1.40	40.3	0.7%	12.98	1.39	-0.5%	

Table 3: Parameter of the head tissue simulating liquid

Note: The dielectric properties have been measured using the contact probe method at 22°C.

6.1.11 Measurement uncertainty evaluation for SAR test

DASY5 Uncertainty Budget According to IEEE 1528/2003 and IEC 62209-1 for the 300 MHz - 3 GHz range									
Source of uncertainty	ncertainty Valu ± %	Probability Distribution	Divisor	c_i (1g)	c_i (10g)	Standard Uncertainty ± %, (1g)	Standard Uncertainty ± %, (10g)	v_i^2 or v_{eff}
Measurement System								
Probe calibration	± 6.0 %	Normal	1	1	1	± 6.0 %	± 6.0 %	∞
Axial isotropy	± 4.7 %	Rectangular	√ 3	0.7	0.7	± 1.9 %	± 1.9 %	∞
Hemispherical isotropy	± 9.6 %	Rectangular	√ 3	0.7	0.7	± 3.9 %	± 3.9 %	∞
Boundary effects	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Probe linearity	± 4.7 %	Rectangular	√ 3	1	1	± 2.7 %	± 2.7 %	∞
System detection limits	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Readout electronics	± 0.3 %	Normal	1	1	1	± 0.3 %	± 0.3 %	∞
Response time	± 0.8 %	Rectangular	√ 3	1	1	± 0.5 %	± 0.5 %	∞
Integration time	± 2.6 %	Rectangular	√ 3	1	1	± 1.5 %	± 1.5 %	∞
RF ambient noise	± 3.0 %	Rectangular	√ 3	1	1	± 1.7 %	± 1.7 %	∞
RF ambient reflections	± 3.0 %	Rectangular	√ 3	1	1	± 1.7 %	± 1.7 %	∞
Probe positioner	± 0.4 %	Rectangular	√ 3	1	1	± 0.2 %	± 0.2 %	∞
Probe positioning	± 2.9 %	Rectangular	√ 3	1	1	± 1.7 %	± 1.7 %	∞
Max.SAR evaluation	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Test Sample Related								
Device positioning	± 2.9 %	Normal	1	1	1	± 2.9 %	± 2.9 %	145
Device holder uncertainty	± 3.6 %	Normal	1	1	1	± 3.6 %	± 3.6 %	5
Power drift	± 5.0 %	Rectangular	√ 3	1	1	± 2.9 %	± 2.9 %	∞
Phantom and Set-up								
Phantom uncertainty	± 4.0 %	Rectangular	√ 3	1	1	± 2.3 %	± 2.3 %	∞
Liquid conductivity (target)	± 5.0 %	Rectangular	√ 3	0.64	0.43	± 1.8 %	± 1.2 %	∞
Liquid conductivity (meas.)	± 5.0 %	Rectangular	√ 3	0.64	0.43	± 1.8 %	± 1.2 %	∞
Liquid permittivity (target)	± 5.0 %	Rectangular	√ 3	0.6	0.49	± 1.7 %	± 1.4 %	∞
Liquid permittivity (meas.)	± 5.0 %	Rectangular	√ 3	0.6	0.49	± 1.7 %	± 1.4 %	∞
Combined Std.						± 11.1 %	± 10.8 %	387
Expanded Std.						± **22.1** %	± **21.6** %	

Table 4: Measurement uncertainties
Worst-Case uncertainty budget for DASY5 assessed according to IEEE 1528/2003.
The budget is valid for 2G and 3G communication signals and frequency range 300MHz - 3 GHz.
For these conditions it represents a worst-case analysis. For specific tests and configurations, the uncertainty could be considerable smaller.

Relative DASY5 Uncertainty Budget for SAR Tests According to IEEE 1528/2013 and IEC62209/2011 for the 0.3 - 3GHz range									
Error Description	ncertainty Valu ± %	Probability Distribution	Divisor	c_i (1g)	c_i (10g)	Standard Uncertainty ± %, (1g)	Standard Uncertainty ± %, (10g)	v_i^2 or v_{eff}
Measurement System								
Probe calibration	± 6.0 %	Normal	1	1	1	± 6.0 %	± 6.0 %	∞
Axial isotropy	± 4.7 %	Rectangular	√3	0.7	0.7	± 1.9 %	± 1.9 %	∞
Hemispherical isotropy	± 9.6 %	Rectangular	√3	0.7	0.7	± 3.9 %	± 3.9 %	∞
Boundary effects	± 1.0 %	Rectangular	√3	1	1	± 0.6 %	± 0.6 %	∞
Probe linearity	± 4.7 %	Rectangular	√3	1	1	± 2.7 %	± 2.7 %	∞
System detection limits	± 1.0 %	Rectangular	√3	1	1	± 0.6 %	± 0.6 %	∞
Modulation Response	± 2.4 %	Rectangular	√3	1	1	± 1.4 %	± 1.4 %	∞
Readout electronics	± 0.3 %	Normal	1	1	1	± 0.3 %	± 0.3 %	∞
Response time	± 0.8 %	Rectangular	√3	1	1	± 0.5 %	± 0.5 %	∞
Integration time	± 2.6 %	Rectangular	√3	1	1	± 1.5 %	± 1.5 %	∞
RF ambient noise	± 3.0 %	Rectangular	√3	1	1	± 1.7 %	± 1.7 %	∞
RF ambient reflections	± 3.0 %	Rectangular	√3	1	1	± 1.7 %	± 1.7 %	∞
Probe positioner	± 0.4 %	Rectangular	√3	1	1	± 0.2 %	± 0.2 %	∞
Probe positioning	± 2.9 %	Rectangular	√3	1	1	± 1.7 %	± 1.7 %	∞
Max. SAR evaluation	± 2.0 %	Rectangular	√3	1	1	± 1.2 %	± 1.2 %	∞
Test Sample Related								
Device positioning	± 2.9 %	Normal	1	1	1	± 2.9 %	± 2.9 %	145
Device holder uncertainty	± 3.6 %	Normal	1	1	1	± 3.6 %	± 3.6 %	5
Power drift	± 5.0 %	Rectangular	√3	1	1	± 2.9 %	± 2.9 %	∞
Phantom and Set-up								
Phantom uncertainty	± 6.1 %	Rectangular	√3	1	1	± 3.5 %	± 3.5 %	∞
SAR correction	± 1.9 %	Rectangular	√3	1	0.84	± 1.1 %	± 0.9 %	∞
Liquid conductivity (meas.)	± 5.0 %	Rectangular	√3	0.78	0.71	± 2.3 %	± 2.0 %	∞
Liquid permittivity (meas.)	± 5.0 %	Rectangular	√3	0.26	0.26	± 0.8 %	± 0.8 %	∞
Temp. Unc. - Conductivity	± 3.4 %	Rectangular	√3	0.78	0.71	± 1.5 %	± 1.4 %	∞
Temp. Unc. - Permittivity	± 0.4 %	Rectangular	√3	0.23	0.26	± 0.1 %	± 0.1 %	∞
Combined Uncertainty						± 11.3 %	± 11.3 %	330
Expanded Std. Uncertainty						± **22.7** %	± **22.5** %	

Table 5: Measurement uncertainties
Worst-Case uncertainty budget for DASY5 assessed according to IEEE 1528/2013 and IEC 62209-1/2011 standards. The budget is valid for the frequency range 300MHz -3 GHz and represents a worst-case analysis. For specific tests and configurations, the uncertainty could be considerable smaller.

DASY5 Uncertainty Budget According to IEC 62209-2/2010 for the 300 MHz - 6 GHz range									
Source of uncertainty	Uncertainty Value	Probability Distribution	Divisor	c_i (1g)	c_i (10g)	Standard Uncertainty ± %, (1g)	Standard Uncertainty ± %, (10g)	v_i^2 or v_{eff}
Measurement System								
Probe calibration	± 6.6 %	Normal	1	1	1	± 6.6 %	± 6.6 %	∞
Axial isotropy	± 4.7 %	Rectangular	√3	0.7	0.7	± 1.9 %	± 1.9 %	∞
Hemispherical isotropy	± 9.6 %	Rectangular	√3	0.7	0.7	± 3.9 %	± 3.9 %	∞
Boundary effects	± 2.0 %	Rectangular	√3	1	1	± 1.2 %	± 1.2 %	∞
Probe linearity	± 4.7 %	Rectangular	√3	1	1	± 2.7 %	± 2.7 %	∞
System detection limits	± 1.0 %	Rectangular	√3	1	1	± 0.6 %	± 0.6 %	∞
Modulation Response	± 2.4 %	Rectangular	√3	1	1	± 1.4 %	± 1.4 %	∞
Readout electronics	± 0.3 %	Normal	1	1	1	± 0.3 %	± 0.3 %	∞
Response time	± 0.8 %	Rectangular	√3	1	1	± 0.5 %	± 0.5 %	∞
Integration time	± 2.6 %	Rectangular	√3	1	1	± 1.5 %	± 1.5 %	∞
RF ambient noise	± 3.0 %	Rectangular	√3	1	1	± 1.7 %	± 1.7 %	∞
RF ambient reflections	± 3.0 %	Rectangular	√3	1	1	± 1.7 %	± 1.7 %	∞
Probe positioner	± 0.8 %	Rectangular	√3	1	1	± 0.5 %	± 0.5 %	∞
Probe positioning	± 6.7 %	Rectangular	√3	1	1	± 3.9 %	± 3.9 %	∞
Post-processing	± 4.0 %	Rectangular	√3	1	1	± 2.3 %	± 2.3 %	∞
Test Sample Related								
Device positioning	± 2.9 %	Normal	1	1	1	± 2.9 %	± 2.9 %	145
Device holder uncertainty	± 3.6 %	Normal	1	1	1	± 3.6 %	± 3.6 %	5
Power drift	± 5.0 %	Rectangular	√3	1	1	± 2.9 %	± 2.9 %	∞
Phantom and Set-up								
Phantom uncertainty	± 7.9 %	Rectangular	√3	1	1	± 4.6 %	± 4.6 %	∞
SAR correction	± 1.9 %	Rectangular	√3	1	0.84	± 1.1 %	± 0.9 %	∞
Liquid conductivity (meas.)	± 5.0 %	Rectangular	√3	0.78	0.71	± 2.3 %	± 2.0 %	∞
Liquid permittivity (meas.)	± 5.0 %	Rectangular	√3	0.26	0.26	± 0.8 %	± 0.8 %	∞
Temp. Unc. - Conductivity	± 3.4 %	Rectangular	√3	0.78	0.71	± 1.5 %	± 1.4 %	∞
Temp. Unc. - Permittivity	± 0.4 %	Rectangular	√3	0.23	0.26	± 0.1 %	± 0.1 %	∞
Combined Uncertainty						± 12.7 %	± 12.6 %	330
Expanded Std. Uncertainty						± **25.4** %	± **25.3** %	

Table 6: Measurement uncertainties.
Worst-Case uncertainty budget for DASY5 assessed according to according to IEC 62209-2/2010 standard. The budget is valid for the frequency range 300MHz - 6 GHz and represents a worst-case analysis. For specific tests and configurations, the uncertainty could be considerable smaller.

6.1.12 Measurement uncertainty evaluation for System Check

Uncertainty of a System Performance Check with DASY5 System for the 0.3 - 3 GHz range									
Source of uncertainty	Uncertainty Value	Probability Distribution	Divisor	c_i (1g)	c_i (10g)	Standard Uncertainty ± %, (1g)	Standard Uncertainty ± %, (10g)	v_i^2 or v_{eff}
Measurement System								
Probe calibration	± 6.0 %	Normal	1	1	1	± 6.0 %	± 6.0 %	∞
Axial isotropy	± 4.7 %	Rectangular	√ 3	0.7	0.7	± 1.9 %	± 1.9 %	∞
Hemispherical isotropy	± 0.0 %	Rectangular	√ 3	0.7	0.7	± 0.0 %	± 0.0 %	∞
Boundary effects	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Probe linearity	± 4.7 %	Rectangular	√ 3	1	1	± 2.7 %	± 2.7 %	∞
System detection limits	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Readout electronics	± 0.3 %	Normal	1	1	1	± 0.3 %	± 0.3 %	∞
Response time	± 0.0 %	Rectangular	√ 3	1	1	± 0.0 %	± 0.0 %	∞
Integration time	± 0.0 %	Rectangular	√ 3	1	1	± 0.0 %	± 0.0 %	∞
RF ambient conditions	± 3.0 %	Rectangular	√ 3	1	1	± 1.7 %	± 1.7 %	∞
Probe positioner	± 0.4 %	Rectangular	√ 3	1	1	± 0.2 %	± 0.2 %	∞
Probe positioning	± 2.9 %	Rectangular	√ 3	1	1	± 1.7 %	± 1.7 %	∞
Max. SAR evaluation	± 1.0 %	Rectangular	√ 3	1	1	± 0.6 %	± 0.6 %	∞
Test Sample Related								
Dev. of experimental dipole	± 0.0 %	Rectangular	√ 3	1	1	± 0.0 %	± 0.0 %	∞
Source to liquid distance	± 2.0 %	Rectangular	√ 3	1	1	± 1.2 %	± 1.2 %	∞
Power drift	± 3.4 %	Rectangular	√ 3	1	1	± 2.0 %	± 2.0 %	∞
Phantom and Set-up								
Phantom uncertainty	± 4.0 %	Rectangular	√ 3	1	1	± 2.3 %	± 2.3 %	∞
SAR correction	± 1.9 %	Rectangular	√ 3	1	0.84	± 1.1 %	± 0.9 %	∞
Liquid conductivity (meas.)	± 5.0 %	Normal	1	0.78	0.71	± 3.9 %	± 3.6 %	∞
Liquid permittivity (meas.)	± 5.0 %	Normal	1	0.26	0.26	± 1.3 %	± 1.3 %	∞
Temp. unc. - Conductivity	± 1.7 %	Rectangular	√ 3	0.78	0.71	± 0.8 %	± 0.7 %	∞
Temp. unc. - Permittivity	± 0.3 %	Rectangular	√ 3	0.23	0.26	± 0.0 %	± 0.0 %	∞
Combined Uncertainty						± 9.1 %	± 8.9 %	330
Expanded Std. Uncertainty						± **18.2** %	± **17.9** %	

Table 7: Measurement uncertainties of the System Check with DASY5 (0.3-3GHz)

Note: Worst case probe calibration uncertainty has been applied for all probes used during the measurements.

6.1.13 System check

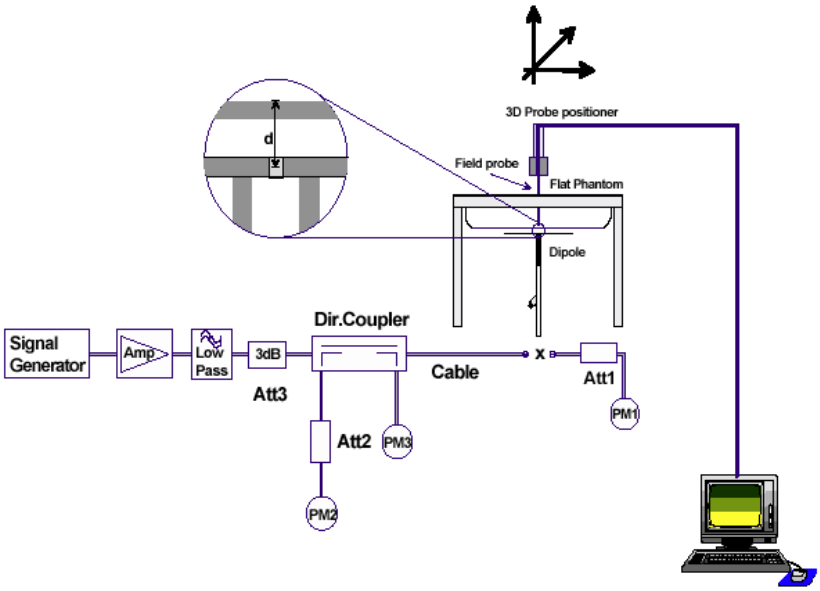
The system check is performed for verifying the accuracy of the complete measurement system and performance of the software. The system check is performed with tissue equivalent material according to IEEE 1528. The following table shows system check results for all frequency bands and tissue liquids used during the tests (plot(s) see annex A).

System performence check (1000 mW)									
System validation Kit	Probe	Frequency	Target SAR_{1g} /mW/g (+/-10%)	Target SAR_{10g} /mW/g (+/-10%)	Measured SAR_{1g} / mW/g	SAR_{1g} dev.	Measured SAR_{10g} / mW/g	SAR_{10g} dev.	Measured date
D1900V2 S/N:	ES3DV3 S/N: 3320	1900 MHz HSL	39.20	20.70	40.30	2.8%	21.10	1.9%	2019-04-30

Table 8: Results system check

6.1.14 System check procedure

The system check is performed by using a validation dipole which is positioned parallel to the planar part of the SAM phantom at the reference point. The distance of the dipole to the SAM phantom is determined by a plexiglass spacer. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 1000 mW for frequencies below 2 GHz or 100 mW for frequencies above 2 GHz. To adjust this power a power meter is used. The power sensor is connected to the cable before the system check to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the validation to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test (result on plot).
System check results have to be equal or near the values determined during dipole calibration (target SAR in table above) with the relevant liquids and test system.



6.1.15 System validation

The system validation is performed in a similar way as a system check. It needs to be performed once a SAR measurement system has been established and allows an evaluation of the system accuracy with all components used together with the specified system. It has to be repeated at least once a year or when new system components are used (DAE, probe, phantom, dipole, liquid type).
In addition to the procedure used during system check a system validation also includes checks of probe isotropy, probe modulation factor and RF signal.

The following table lists the system validations relevant for this test report:

Frequency (MHz)	DASY SW	Dipole Type /SN	Probe Type / SN	Calibrated signal type(s)	DAE unit Type / SN	head validation
1900	V52.8.7	D1900V2 / 5d009	ES3DV3 / 3320	CW	DAE3 / 413	2019-02-06

7 Detailed Test Results

7.1 Conducted power measurements UPCS 1925 MHz

Maximum conducted output power (dBm)			
Channel	Frequency (MHz)	P_{peak}	P_{avg} full slot
4	1921.536	19.3	5.5
2	1924.992	19.3	5.5
0	1928.448	19.1	5.3

Table 9: Test results conducted power measurement UPCS 1925 MHz

7.2 SAR test results

7.2.1 General description of test procedures

- The DUT is tested using CMD 65 tester to control test channels and maximum output power of the DUT.
- Test positions as described in the tables above are in accordance with the specified test standard.
- According to IEEE 1528 the SAR test shall be performed at middle channel. Testing of top and bottom channel is optional.
- According to KDB 447498 D01 testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:
  - ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
  - ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
  - ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
- IEEE 1528-2013 requires the middle channel to be tested first. This generally applies to wireless devices that are designed to operate in technologies with tight tolerances for maximum output power variations across channels in the band. When the maximum output power variation across the required test channels is > ½ dB, instead of the middle channel, the highest output power channel must be used.

7.2.2 Results overview

measured SAR numbers - Head - UPCS 1925 MHz										
Ch.	Freq. (MHz)	Position	cond. P_{max} (dBm)		SAR_{1g} (W/kg)		SAR_{10g} (W/kg)		power drift (dB)	liquid (°C)
			decl.*	meas.	meas.	extrap.	meas.	extrap.		
2	1925.0	left	20.0	19.3	0.0059	0.0069	0.003	0.004	0.00	21.9
4	1921.5	right	20.0	19.3	**0.0064**	**0.0075**	0.004	0.004	0.17	21.9
2	1925.0	right	20.0	19.3	0.0060	0.0071	0.004	0.004	0.07	21.9
0	1928.4	right	20.0	19.1	0.0057	0.0071	0.003	0.004	0.09	21.9

Table 10: Test results head SAR UPCS 1925 MHz

* - maximum possible output power declared by manufacturer

8 Test equipment and ancillaries used for tests

To simplify the identification of the test equipment and/or ancillaries which were used, the reporting of the relevant test cases only refer to the test item number as specified in the table below.

Equipment	Type	Manufacturer	Serial No.	Last Calibration	Frequency (months)
Dosimetric E-Field Probe	ES3DV3	Schmid & Partner Engineering AG	3320	January 24, 2019	12
1900 MHz System Validation Dipole	D1900V2	Schmid & Partner Engineering AG	5d009	May 10, 2017	36
Data acquisition electronics	DAE3V1	Schmid & Partner Engineering AG	413	January 17, 2019	12
Software	DASY52 52.8.7	Schmid & Partner Engineering AG	---	N/A	--
SAM Twin Phantom V5.0	QD 000 P40 C	Schmid & Partner Engineering AG	1813	N/A	--
Universal Radio Communication Tester	CMD-65	Rohde & Schwarz	825486/005	January 31, 2018	24
Network Analyser 300 kHz to 6 GHz	8753ES	Agilent Technologies)*	US39174436	December 14, 2017	24
Dielectric Probe Kit	85070C	Hewlett Packard	US99360146	N/A	12
Signal Generator	8665A	Hewlett Packard	2833A00112	December 14, 2017	24
Amplifier	25S1G4 (25 Watt)	Amplifier Reasearch	20452	N/A	--
Power Meter	NRP	Rohde & Schwarz	101367	December 11, 2018	24
Power Meter Sensor	NRP Z22	Rohde & Schwarz	100227	December 11, 2018	12
Power Meter Sensor	NRP Z22	Rohde & Schwarz	100234	December 11, 2018	12
Directional Coupler	778D	Hewlett Packard	19171	December 10, 2017	12

)* : Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

9 Observations

No observations exceeding those reported with the single test cases have been made.

Annex A: System performance check

Date/Time: 30.04.2019 14:15:06

SystemPerformanceCheck-D1900 HSL 2019-04-30

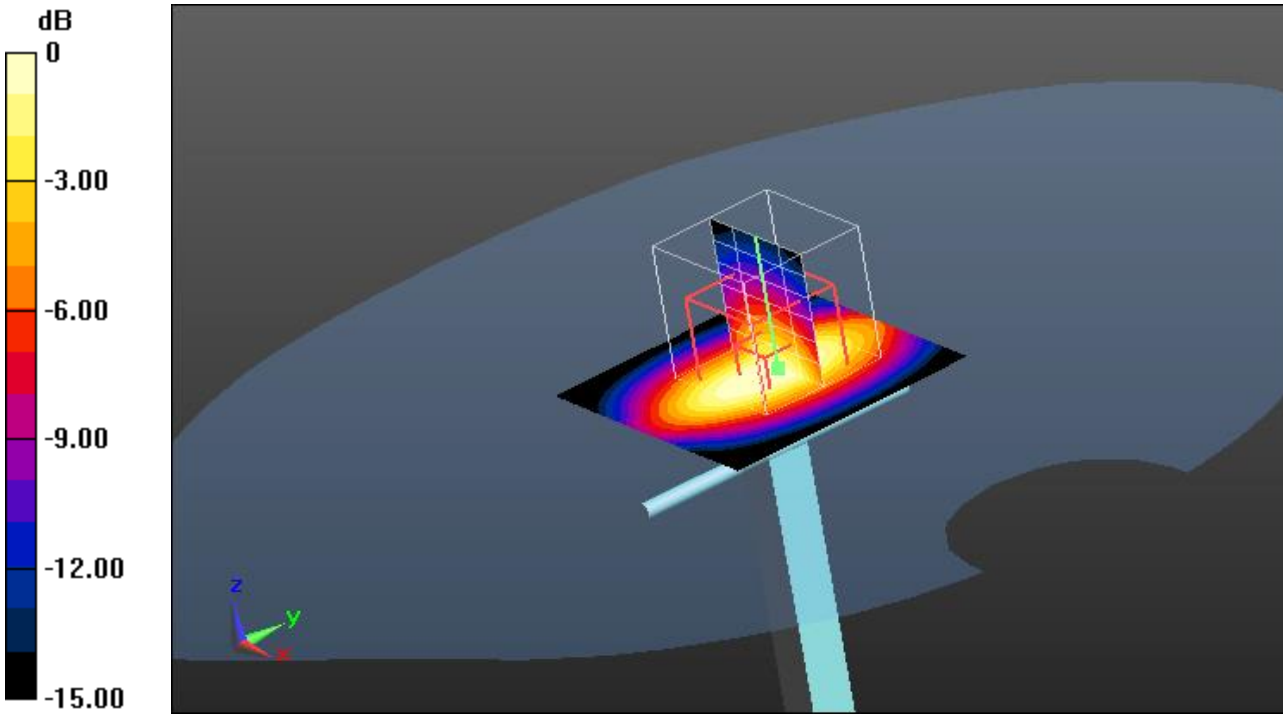
DUT: Dipole 1900 MHz; Type: D1900V2; Serial: 5d009
Communication System: UID 0, CW (0); Communication System Band: D1900 (1900.0 MHz); Frequency: 1900 MHz; Communication System PAR: 0 dB; PMF: 1
Medium parameters used: f = 1900 MHz; σ = 1.379 S/m; ε_r = 40.324; ρ = 1000 kg/m^3
Phantom section: Flat Section
Measurement Standard: DASY5
DASY5 Configuration:
- Probe: ES3DV3 - SN3320; ConvF(5.16, 5.16, 5.16); Calibrated: 24.01.2019;
- Sensor-Surface: 3mm (Mechanical Surface Detection), z = 2.0, 32.0
- Electronics: DAE3 Sn413; Calibrated: 17.01.2019
- Phantom: SAM front; Type: QD000P40CC; Serial: TP-1041
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

HSL1900/d=10mm, Pin=100 mW, dist=3mm/Area Scan (41x41x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 5.23 W/kg

HSL1900/d=10mm, Pin=100 mW, dist=3mm/Zoom Scan (5x5x7)/Cube 0:

Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm
Reference Value = 63.359 V/m; Power Drift = -0.05 dB
Peak SAR (extrapolated) = 7.27 W/kg
SAR(1 g) = 4.03 W/kg; SAR(10 g) = 2.11 W/kg
Maximum value of SAR (measured) = 5.05 W/kg



0 dB = 5.05 W/kg = 7.03 dBW/kg

Additional information:
ambient temperature: 23.9°C; liquid temperature: 21.9°C

Annex B: DASY5 measurement results

SAR plots for **the highest measured SAR** in each exposure configuration, wireless mode and frequency band combination according to FCC KDB 865664 D02

Date/Time: 30.04.2019 13:49:51

IEEE1528 - DECT UPCS-1925 head

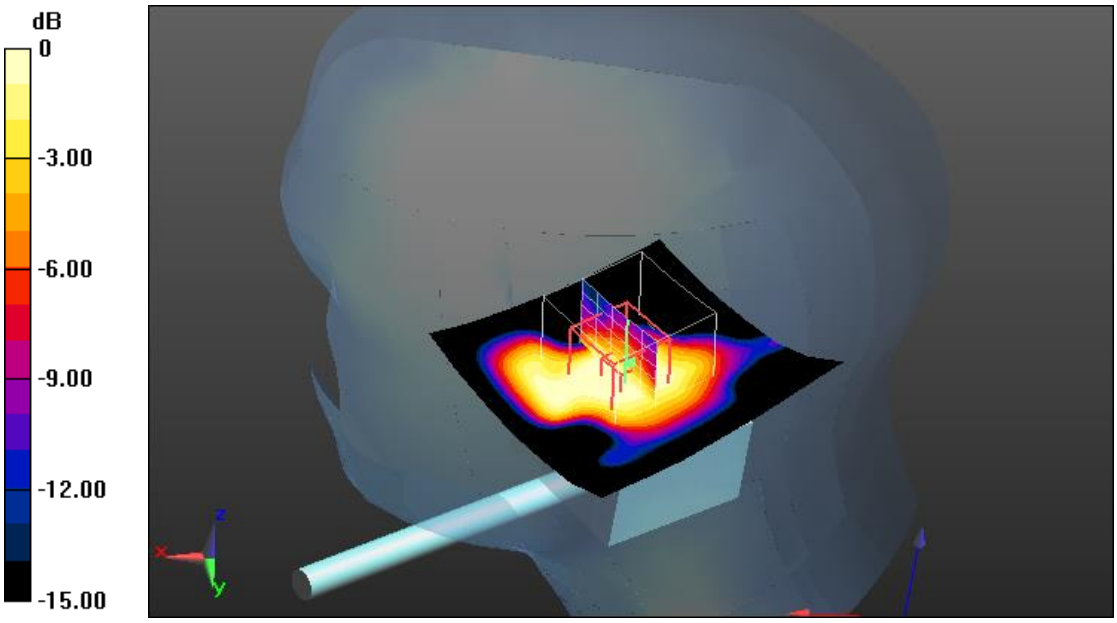
DUT: Plantronics; Type: S7220T/A; Serial: 00WAUH
Communication System: UID 0, DECT (0); Communication System Band: UPCS 1925; Frequency: 1921.54 MHz; Communication System PAR: 13.802 dB; PMF: 4.89892
Medium parameters used: f = 1922 MHz; σ = 1.387 S/m; ε_r = 40.275; ρ = 1000 kg/m^3
Phantom section: Right Section
Measurement Standard: DASY5
DASY5 Configuration:
- Probe: ES3DV3 - SN3320; ConvF(5.16, 5.16, 5.16); Calibrated: 24.01.2019;
- Sensor-Surface: 3mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 3mm (Mechanical Surface Detection), z = 2.0, 27.0
- Electronics: DAE3 Sn413; Calibrated: 17.01.2019
- Phantom: SAM front; Type: QD000P40CC; Serial: TP-1041
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

Right-Side HSL/Touch Position - Low/Area Scan (61x61x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 0.0112 W/kg

Right-Side HSL/Touch Position - Low/Zoom Scan (6x6x7)/Cube 0:

Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm
Reference Value = 2.524 V/m; Power Drift = 0.17 dB
Peak SAR (extrapolated) = 0.0100 W/kg
SAR(1 g) = 0.00641 W/kg; SAR(10 g) = 0.00378 W/kg
Maximum value of SAR (measured) = 0.00759 W/kg

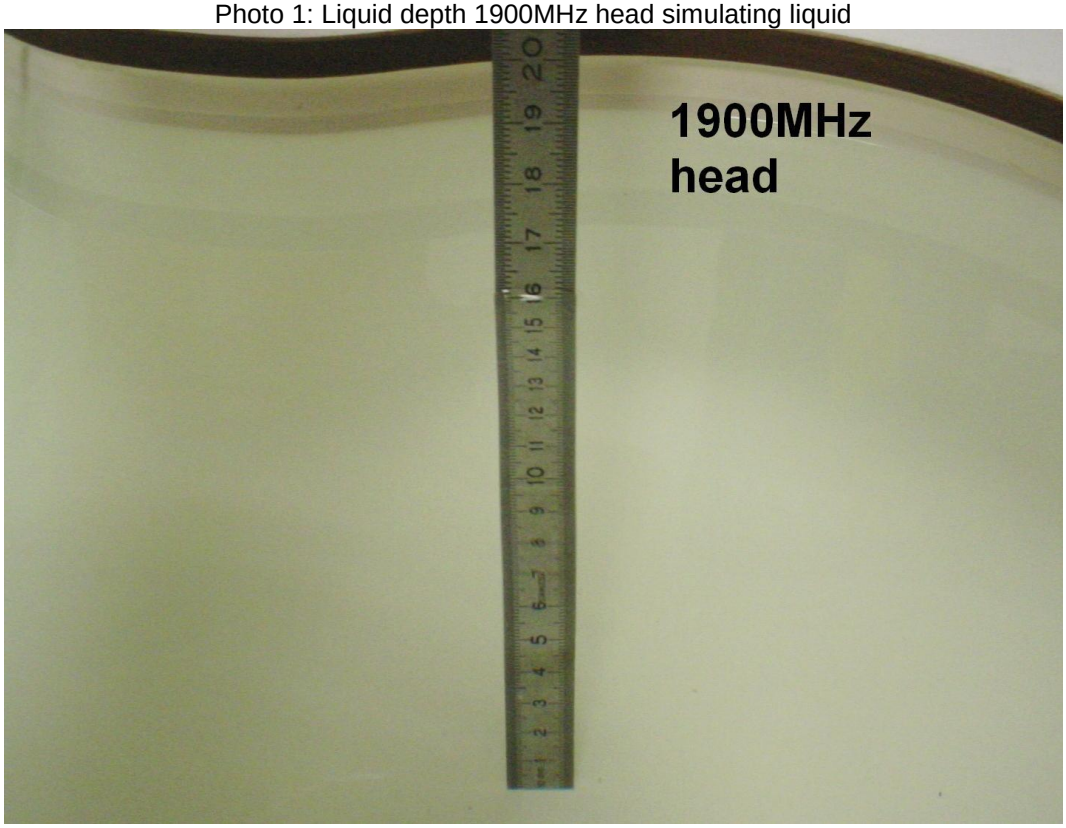


0 dB = 0.00759 W/kg = -21.20 dBW/kg

Additional information:
ambient temperature: 23.9°C; liquid temperature: 21.9°C

Annex B.1: Liquid depth

Photo 1: Liquid depth 1900MHz head simulating liquid



Annex C: Photo documentation

Photo documentation is described in the additional document:

Appendix to test report no. 1-7958/19-01-06 Photo documentation

Annex D: Calibration parameters

Calibration parameters are described in the additional document:

Appendix to test report no. 1-7958/19-01-06
Calibration data, Phantom certificate
and detail information of the DASY5 System

Annex E: RSS-102 Annex A and B

ICRF documents are described in the additional document:

Appendix to test report no. 1-7958/19-01-06_ICRF
RF Technical Brief Cover Sheet acc. To RSS-102 Annex A and
Declaration of RX Exposure Compliance Annex B

Annex F: Document History

Version	Applied Changes	Date of Release
	Initial Release	2019-05-10

Annex G: Further Information

Glossary

DUT	-	Device under Test
EUT	-	Equipment under Test
FCC	-	Federal Communication Commission
FCC ID	-	Company Identifier at FCC
HW	-	Hardware
ISED	-	Innovation, Science and Economic Development Canada
Inv. No.	-	Inventory number
N/A	-	not applicable
OET	-	Office of Engineering and Technology
SAR	-	Specific Absorption Rate
S/N	-	Serial Number
SW	-	Software
UPCS	-	Unlicensed Personal Consumptions Services