

SAR Test Report - Class II Permissive Change

Applicant:



L3Harris Corporation
221 Jefferson Ridge Parkway
Lynchburg, VA, 24501
USA

FCC ID:

OWDTR-0179-E

Product Name / PMN

XL-300P

Maximum *reported* 1g SAR

TNF	BODY:	1.16	W/kg
	FACE:	1.97	
PCS	BODY:	1.36	
	FACE:	<0.1	
DTS	BODY:	<0.1	
	FACE:	<0.1	
DSS	BODY:	<0.1	
	FACE:	<0.1	
NII	BODY:	<0.1	
	FACE:	0.17	
Simultaneous Body:		2.52	
Simultaneous Face:		2.01	
Occupational Limit:		8.00	

Product Model Number / HVIN

see Section 2.0

In Accordance With:

FCC 47 CFR §2.1093

Radiofrequency Radiation Exposure Evaluation: Portable Devices

Approved By:



Ben Hewson, President

Celltech Labs Inc.
21-364 Lougheed Rd.
Kelowna, BC, V1X 7R8
Canada



Test Lab Certificate: 2470.01



Industry
Canada

IC Registration 3874A



FCC Registration: 608310
MRA Designation: CA3874

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1.0 REVISION HISTORY

Revision History				
Samples Tested By:		Ben Hewson		Date(s) of Evaluation: 10 March - 15 April, 2026
Report Prepared By:		Ben Hewson		Report Reviewed By: Art Voss
Report Revision	Description of Revision	Revised Section	Revised By	Revision Date
0.1	Draft	n/a	Art Voss	14 April 2026
1.0	Initial Release	n/a	Art Voss	6 May 2026
2.0	Revised Plots	Ppg 47, 53	Art Voss	18 May 2026
	Revised Simultaneous Analysis Table 11.4	Pg 25		
	Revised Day Log Table 13.1	Pg 27		

2.0 APPLICANT AND DEVICE INFORMATION

Client Information	
Applicant Name	L3Harris Corporation
Applicant Address	221 Jefferson Ridge Parkway
	Lynchburg, VA, 24501
	USA
DUT Information	
Device Identifier(s):	FCC ID: OWDTR-0179-E
Device Marketing Name / PMN:	XL-300P
Test Sample Serial No.:	A40342F00164 - OTA
	A4034FF00077 - OTA
	A4034FF00078 - Conducted
Equipment Class (FCC):	Licensed Non-Broadcast Transmitter Held to Face (TNF) FCC Part 90 - LMRS
	Digital Transmission System (DTS) FCC Part 15C - WiFi
	Spread Spectrum Transmitter (DSS) FCC Part 15C - BT
	Unlicensed National Information Infrastructure (NII) FCC Part 15E - WiFi
Transmit Frequency Range (FCC):	VHF Band: 136 - 174MHz
	UHF Band: 378 - 522MHz
	700 Band: 769 - 775MHz, 799 - 805MHz
	800 Band: 806 - 824MHz, 851 - 869MHz
Number of Channels:	Programmable
Transmitter Rated Power (Max): Including Tune-Up Tolerance	VHF Band: 6.0W (37.8dBm) +/-1.0dB
	UHF Band: 5W (37.0dBm) +/-1.0dB
	700 Band: 2.5W (34.0dBm) +/-1.0dB
	800 Band: 3.0W (34.8dBm) +/-1.0dB
	BT: 0.005W (6.9dBm)
	WLAN 2.4G: 0.0243W (23.85dBm)
	WLAN 5G: 5180-5240MHz: 0.050W (16.98dBm)
	WLAN 5G: 5745-5825MHz: 0.070W (18.43dBm)
Duty Cycle:	BT/WLAN/LTE: 100%, LMR: 50% PTT Duty Cycle
DUT Power Source:	7.4VDC Li-Ion Rechargeable Battery, AA Alkaline Battery
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

Client Information		
Applicant Name	L3Harris Corporation	
Applicant Address	221 Jefferson Ridge Parkway	
	Lynchburg, VA, 24501	
	USA	
DUT Information		
Device Identifier(s):	FCC ID:	OWDTR-0179-E
Device Marketing Name / PMN:	XL-300P	
Device Model(s) / HVIN:	Full Keypad	Partial Keypad
EM8695 LTE Modem	14038-1030-01	14038-1030-011
	14038-1030-02	14038-1030-012
	14038-1030-03	14038-1030-013

Integrated Module Information	
Module Manufacturer:	Sierra Wireless Inc.
Device Identifier(s):	FCC ID: N7NEM86T
	IC ID: 2417C-EM86T
Device Type:	LTE Module ⁽³⁾
Module Device Model(s) / HVIN:	EM8695
Equipment Class (FCC):	PCS Licensed Transmitter
Equipment Class (ISED):	Cellular Network - Other Portable Device
Transmit Frequency Range: ⁽¹⁾⁽²⁾	LTE Band 1: 1920 - 1980MHz
	LTE Band 2: 1850 - 1910MHz
	LTE Band 3: 1710 - 1785MHz
	LTE Band 4: 1710 - 1755MHz
	LTE Band 5: 824 - 849MHz
	LTE Band 7: 2500 - 2570MHz
	LTE Band 8: 880 - 9140MHz
	LTE Band 12: 699 - 716MHz
	LTE Band 13: 777-787MHz
	LTE Band 14: 788 - 798MHz
	LTE Band 25: 1850 - 1915MHz
	LTE Band 26: 814 - 849MHz
	LTE Band 28: 703 - 748MHz
	LTE Band 40: 2300 - 2400MHz
	LTE Band 41: 2496 - 2690MHz
	LTE Band 48: 3600 - 3700MHz
	LTE Band 66: 1710 - 1780MHz
	LTE Band 71: 663 - 698MHz
	LTE Band 106: 896 - 901MHz
Nominal Output Power:	200mW (23dBm) ⁽⁴⁾

(1) The transmit modes and/or frequency bands indicated are those utilized by the host integrator and may not be indicative of all modes and/or frequency bands available for the modular device.

(2) Uplink frequencies.

(3) LTE: 3GPP Release 16. Carrier Aggregation supported downlink Only.

Note: Per FCC KDB 941225, a PAG is not required for downlink-only carrier aggregation.

(4) As set by the host integrator which may lower than the actual module specification. Includes Tune-Up Tolerance.

3.0 SCOPE OF EVALUATION

This Certification Report was prepared on behalf of:

L3Harris Corporation

„(the '*Applicant*')", in accordance with the applicable Federal Communications Commission (FCC) CFR 47 and Innovation, Scientific and Economic Development (ISED) Canada rules parts and regulations (the '*Rules*'). The scope of this investigation was limited to only the equipment, devices and accessories (the '*Equipment*') supplied by the *Applicant*. The tests and measurements performed on this *Equipment* were only those set forth in the applicable *Rules* and/or the Test and Measurement Standards they reference. The *Rules* applied and the Test and Measurement Standards used during this evaluation appear in the Normative References section of this report. The limits set forth in the technical requirements of the applicable *Rules* were applied to the measurement results obtained during this evaluation and, unless otherwise noted, these limits were used as the Pass/Fail criteria. The Pass/Fail statements made in this report apply to only the tests and measurements performed on only the *Equipment* tested during this evaluation. Where applicable and permissible, information including test and measurement data and/or results from previous evaluations of same or similar equipment, devices and/or accessories may be cited in this report.

As per FCC 47 CFR Part §2.1091 and §2.1093, an RF Exposure evaluation report is required for this *Equipment* and the results of the RF Exposure evaluation appear in this report.

Device Description:

The XL-300P, FCC ID: **OWDTR-0179E**, is a multi-band VHF/UHF/7/800 Push-To-Talk (PTT), Land Mobile Radio Service (LMRS) transceiver intended for Occupational Use. It is an identical variant of the XL-200P, FCC ID: **OWDTR-0179E**, in all aspects, including the DTS, DSS and U-NII transceivers, conducted output power, antennas, form factor and PCB layout. This variant contains a pin-for-pin compatible drop-in replacement pre-certified LTE modem, EM8695, replacing the EM75xx series modem found on the XL-200P.

Application:

This is an application for a Class II Permissive Change.

Scope:

The scope of this investigation is to evaluate the SAR for intended use application. The Test Plan developed for this evaluation was based on the test channels and configurations which produced the highest SAR of the XL-200P evaluation and where applicable, SAR test reduction and/or SAR test exclusion was utilized. Spot-checks of the conducted power and SAR will be performed and compared to the worst-case configurations from the previous evaluation of the XL-200P for the LMR and PCS transceivers. Due to the exceptionally low SAR found with the DTS, DSS and U-NII transceivers, the data from the XL-200P evaluation will be used for the simultaneous transmission analysis. The DUT will be evaluated for SAR at the maximum tune up tolerance and conducted output power level, preset by the manufacturer and in accordance with the procedures described in IEC/IEEE 62209-1528, FCC KDB 447498 D01v06r02, 643646.

4.0 NORMATIVE REFERENCES

Normative References*	
ANSI / ISO 17025:2017	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2	Code of Federal Regulations
Title 47:	Telecommunication
Part 2.1093:	Radiofrequency Radiation Exposure Evaluation: Portable Devices
Health Canada	
Safety Code 6 (2015)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3kHz to 300GHz
Industry Canada Spectrum Management & Telecommunications Policy	
RSS-102 Issue 6:	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
IEEE International Committee on Electromagnetic Safety	
IEC/IEEE 62209-1528	frequency fields from hand-held and body-mounted wireless communication devices – Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)
FCC KDB	
KDB 248227 D01v02r02	SAR Guidance for IEEE 802.11 (WiFi) Transmitters
FCC KDB	
KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
FCC KDB	
KDB 643646 D01v01r03	SAR Test Reduction Considerations for Occupational PTT Radios
FCC KDB	
KDB 690783 D01v01r03	SAR Listings on Equipment Authorization Grants
FCC KDB	
KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB	
KDB 941225 D05v02r05	SAR Evaluation Considerations for LTE Devices
* When the issue number or issue date is omitted, the latest version is assumed.	

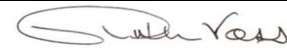
5.0 STATEMENT OF COMPLIANCE

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

Applicant: L3Harris Corporation	Model Name / PMN: XL-300P	
Standard(s) Applied: FCC 47 CFR §2.1093	Measurement Procedure(s): FCC KDB 865664, FCC KDB 447498, FCC KDB 643646 IEC/IEEE 62209-1528	
Reason For Issue: ☐ New Certification ☐ Class I Permissive Change ☒ Class II Permissive Change	Use Group: ☐ General Population / Uncontrolled ☒ Occupational / Controlled	Limits Applied: ☐ 1.6W/kg - 1g Volume ☒ 8.0W/kg - 1g Volume ☐ 4.0W/kg - 10g Volume
Reason for Change: Replacement of EM75xx series LTE modem with EM8695.		Date(s) Evaluated: 10 March - 15 April, 2026

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.



Art Voss, P.Eng.
Technical Manager
Celltech Labs Inc.

14 April 2026

Date



6.0 SAR MEASUREMENT SYSTEM

SAR Measurement System

Celltech Labs Inc. SAR measurement facility employs a Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY6 measurement system is comprised of the measurement server, a robot controller, a computer, a near-field probe, a probe alignment sensor, an Elliptical Planar Phantom (ELI) phantom and a specific anthropomorphic mannequin (SAM) phantom for Head and/or Body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller and a teach pendant (Joystick) to control the robot's servo motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit 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 form the DAE to digital electronic signal and transfers data to the DASY6 measurement server. The DAE4 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter, a command decoder and a control logic unit. Transmission to the DASY6 measurement server 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. The sensor systems are also used for mechanical surface detection and probe collision detection. The robot utilizes a controller with built in VME-bus computer.



DASY 6 SAR System



DASY 6 Measurement Controller

7.0 RF CONDUCTED POWER MEASUREMENT

Table 7.1 Conducted Power Measurements TNF – UHF

LMR Conducted Power										
Channel Band	Frequency (MHz)	Modulation	DUT	Measured Power (dBm)	Rated ⁽¹⁾ Power (dBm)	Rated ⁽¹⁾ Power (W)	Delta (dBm)	Duty Cycle (%)	Crest Factor (n)	Test Channel (Y)
UHF	430.0125	CW	XL-200P	37.99	38.00	6.31	-0.01	100.0	1.00	Y
UHF	430.0125	CW	XL-300P	37.90	38.00	6.31	-0.10	100.0	1.00	Y

(1) Includes Tune-Up Tolerance

Table 7.2 Conducted Power Measurements TNF – 7/800 Band

LMR Conducted Power										
Channel Band	Frequency (MHz)	Modulation	DUT	Measured Power (dBm)	Rated ⁽¹⁾ Power (dBm)	Rated ⁽¹⁾ Power (W)	Delta (dBm)	Duty Cycle (%)	Crest Factor (n)	Test Channel (Y)
7/800	868.9875	CW	XL-200P	35.80	35.80	3.80	0.00	100.0	1.00	Y
7/800	868.9875	CW	XL-300P	34.86	35.80	3.80	-0.94	100.0	1.00	Y

(1) Includes Tune-Up Tolerance

Table 7.3 Conducted Power Measurements PCS – LTE Band 8

LTE Conducted Power Measurement										
LTE Band:		8		DL Chan:	3625	Channel Bandwidth:				10MHz
Lower Band Edge		880(MHz)		Upper Band Edge:						915(MHz)
Modulation	Resource Block			Low 21500 885(MHz)		Mid 21625 897.5(MHz)		High 21750 910(MHz)		Chan Pos EARFCN Chan Freq
	Size	Offset	POS	Conducted Power (dBm)						DUT
					ID		ID		ID	
QPSK	1	0	Low	22.71	RB1-1	22.63	RB1-2	21.45	RB1-3	XL-200P
	1	0	Low	19.87	RB1-1	19.88	RB1-2	19.51	RB1-3	XL-300P
	= Required for highest conducted power									

Table 7.4 Conducted Power Measurements PCS – LTE Band 12

LTE Conducted Power Measurement										
LTE Band:		12		DL Chan:		5095		Channel Bandwidth		10MHz
Lower Band Edge		699(MHz)		Upper Band Edge:						716(MHz)
Modulation	Resource Block			Low 23060 704(MHz)		Mid 23095 707.5(MHz)		High 23130 711(MHz)		Chan Pos EARFCN Chan Freq
	Size	Offset	POS	Conducted Power (dBm)						DUT
					ID		ID		ID	
QPSK	1	0	Low	19.99	RB1-3	20.97		21.08		XL-200P
	1	24	Mid	19.10		21.07		21.76	RB1-1	
	1	49	High	19.44		21.35	RB1-2	20.92		
	1	0	Low	20.60	RB1-3	20.34		20.37		XL-300P
	1	24	Mid	20.28		20.61		20.79	RB1-1	
	1	49	High	20.35		20.77	RB1-2	20.53		
	= Required for highest conducted power									

NOTE: The measured conducted power in the smaller bandwidths for each band and RB configuration was less than 1/2dB greater than the *equivalent* RB configuration of the respective largest bandwidth.

*The rated power and tolerance are stated for typical transmission modes and data rates. Some modes and data rates may produce lower than rated conducted power levels. Continuous Wave (CW) mode is a test mode not typical with normal transmission modes and may produce higher than rated conducted power levels. Power measurements taken across the various channels, modes and data rates did not produce levels in excess of the Rated Power plus Tolerance. SAR was evaluated using CW for analog only, all evaluations were completed at the maximum output power level setting and produced the most conservative SAR. The reported SAR was not scaled down.

8.0 NUMBER OF TEST CHANNELS (N_c)

The number of test channels for testing the LMR channel bands is based on the worst-case channels and configurations from the original filing as well the highest conducted output power channel obtained during this evaluation.

Table 8.1 XL-200P Maximum reported SAR

Measured 1g SAR Results																			
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	reported SAR (W/kg)	Test Config. (1)
			Pos	Mode	BW	Mod	BR		DUT (mm)	Antenna (mm)									
XL-200P Original																			
2/12/2025	B2	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Area	10.200	-0.230	0.000	1.000	1.000	50	5.377	N
2/12/2025	B2Z	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Zoom	9.840	-0.220	0.000	1.000	1.000	50	5.176	Y
2/14/2025	F2	868.9875	FACE	7/800		CW		P7 T5 - -	25	65	Area	3.240	-0.410	0.000	1.000	1.000	50.000	1.780	N
2/14/2025	F2Z	868.9875	FACE	7/800		CW		P7 T5 - -	25	65	Zoom	2.930	-0.060	0.000	1.000	1.000	50.000	1.485	N
6/3/2025	B40R	406.1	BODY	UHF		CW		P7 T5 B1 A1	15	35	Area	9.720	-0.600	-0.020	1.000	1.085	50.000	6.082	N
6/6/2025	B310Z	430.0125	BODY	UHF		CW		P7 T5 B1 A1	15	35	Zoom	9.710	0.040	-0.010	1.000	1.018	50.000	4.954	N
6/3/2025	F30	430.0125	FACE	UHF		CW		P7 T4 - -	25	65	Area	4.010	-0.120	-0.010	1.000	1.070	50	2.211	N
6/3/2025	F30Z	430.0125	FACE	UHF		CW		P7 T4 - -	25	65	Zoom	3.670	-0.330	-0.010	1.000	1.070	50	2.123	Y
6/7/2025	B320	138.0125	BODY	VHF		CW		P7 T4 B1 A1	15	35	Area	4.580	2.560	-0.020	1.000	1.000	50	2.301	N
6/7/2025	B320Z	138.0125	BODY	VHF		CW		P7 T4 B1 A1	15	35	Zoom	4.400	0.080	-0.020	1.000	1.000	50	2.210	N
6/7/2025	F320	138.0125	FACE	VHF		CW		P7 T4 - -	25	65	Area	1.550	-0.610	-0.020	1.000	1.000	50.000	0.896	N
6/7/2025	F320Z	138.0125	FACE	VHF		CW		P7 T4 - -	25	65	Zoom	1.350	-0.230	-0.020	1.000	1.000	50.000	0.715	N
4/16/2025	B112	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Area	1.410	0.610	-0.370	1.000	1.000	100	1.535	N
4/16/2025	B112Z	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Zoom	1.400	-0.070	-0.370	1.000	1.000	100	1.549	Y
5/30/2025	F210	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 - -	25	65	Area	0.089	0.120	-0.090	1.000	1.019	100	0.093	N
5/30/2025	F210Z	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 - -	25	65	Zoom	0.048	-0.150	-0.090	1.000	1.019	100	0.052	Y

The above table represents the highest reported SAR from the original evaluation of the XL-200P for Body and Face configurations.

(1) Denotes the worst-case test configuration used in this evaluation of the XL-300P and is indicated by "Y".

Table 8.1 XL-200P Maximum reported SAR (Cont.)

Measured 1g SAR Results																			
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported</u> SAR (W/kg)	Test Config. (1)
			Pos	Mode	BW	Mod	BR		DUT (mm)	Antenna (mm)									
XL-200P Original																			
3/26/2025	B50R	2412	BODY	802.11b		WLAN	1	P14 T7 B1 A1	15	35	Area	0.001	0.000	-0.150	1.000	1.000	100.000	0.001	N
3/26/2025	B51Z	2437	BODY	802.11b		WLAN	1	P14 T7 B1 A1	15	35	Zoom	0.000	0.000	-0.200	1.000	1.000	100.000	0.000	N
3/26/2025	F50	2412	FACE	802.11b		WLAN	1	P14 T7 --	25	65	Area	0.019	2.740	-0.150	1.000	1.000	100.000	0.019	N
3/26/2025	F50Z	2412	FACE	802.11b		WLAN	1	P14 T7 --	25	65	Zoom	0.016	4.050	-0.150	1.000	1.000	100.000	0.016	N
3/28/2025	B60	2402	BODY	802.15		BT	1	P14 T7 B1 A1	0	20	Area	0.001	8.370	-2.600	1.000	1.000	100.000	0.002	N
3/28/2025	B62Z	2480	BODY	802.15		BT	1	P14 T7 B1 A1	0	20	Zoom	0.001	0.000	-1.800	1.000	1.000	100.000	0.001	N
3/27/2025	F61R	2480	FACE	802.15		BT	1	P14 T7 --	25	65	Area	0.012	2.080	-1.800	1.000	1.000	100.000	0.018	N
3/27/2025	F61RZ	2480	FACE	802.15		BT	1	P14 T7 --	25	65	Zoom	0.010	3.120	-1.800	1.000	1.000	100.000	0.016	N
6/9/2025	B330	5180	BODY	UNII-1		UNII-1	9	P14 T7 B1 A1	15	35	Area	0.001	0.639	-0.460	1.000	1.000	100.000	0.001	N
6/9/2025	B340Z	5745	BODY	UNII-3		UNII-3	9	P14 T7 B1 A1	15	35	Zoom	0.002	0.000	-0.120	1.000	1.000	100.000	0.002	N
4/3/2025	F70	5180	FACE	UNII-1		UNII-1	9	P14 T7 --	25	65	Area	0.183	0.410	-0.460	1.000	1.000	100.000	0.203	N
4/3/2025	F70Z	5180	FACE	UNII-1		UNII-1	9	P14 T7 --	25	65	Zoom	0.148	0.890	-0.460	1.000	1.000	100.000	0.165	N

The above table represents the highest reported SAR from the original evaluation of the XL-200P for Body and Face configurations.

(1) Denotes the worst-case test configuration used in this evaluation of the XL-300P and is indicated by "Y".

9.0 ACCESSORIES EVALUATED

Table 9.1 Accessories Evaluated

Antennae Evaluated		
Test Report ID Number	Manufacturer's Part Number	Description
Antenna		
T4	14035-4000-01	Full Spectrum Antenna (136-870 MHz)
T5	14035-4420-01	Wideband Whip Antenna (378-520MHz, 762-870 MHz)
T7	14035-4440-02	1/4 Wave Whip Antenna (762-870 MHz)

Batteries Evaluated		
Test Report ID Number	Manufacturer's Part Number	Description
Battery		
P7	14035-5050-01	Li-Ion Battery 7.2VDC, 4700mAh, 24Wh Standard
P14	Z90-0047-013	BATTERY, LI-ION, 3100MAh, Richom

Body Accessory Evaluated		
Test Report ID Number	Manufacturer's Part Number	Description
Body-Worn Accessory		
B1	12082-1290-01	Metal Belt Clip

Audio Accessory Evaluated				
Test Report ID Number	Manufacturer's Part Number	Description	UDC Group ⁽²⁾	Type II Group ⁽³⁾
Audio Accessory Part 1 of 2				
A1	12082-0600-01	Standard Speaker Microphone	7A	PB

(1) All audio accessories have same connector and attach to the radio in the same fashion.

(2) UDC Group: 9 = 9 Pin, 7A = 7 Pin, 7B = 7 Pin Modified

(3) Type II Group: PB = Palm Button, IL = In-Line Pushbutton, PT = Pigtail Pushbutton, RB = Ring Pushbutton, BB = Body Button, BT = BlueTooth

(4) Accessories are categorized into groups of similar design and construction. Samples of individual groups are SAR Tested and the SAR results apply to ALL

members of the Accessory Group. A "Y" in this column indicates the accessory is deemed acceptable.

(5) Accessories and/or Accessory Group members SAR Tested.

The above accessories are only those evaluated with the XL-300P during this investigation. All of the accessories declared with the XL-200P apply to the XL-300P.

10.0 SAR MEASUREMENT SUMMARY

Table 10.1: Measured Results – TNF BODY- 7/800 Band

Measured 1g SAR Results - BODY Configuration																		
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported</u>
			Pos	Mode	BW	Mod	BR		DUT (mm)	Antenna (mm)								SAR (W/kg)
XL-200P																		
2/12/2025	B2	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Area	10.200	-0.230	0.000	1.000	1.000	50.000	5.377
2/12/2025	B2Z	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Zoom	9.840	-0.220	0.000	1.000	1.000	50.000	5.176
XL-300P																		
3/11/2026	B1	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Area	1.740	-0.660	-0.940	1.000	1.000	50.000	1.258
3/11/2026	B1Z	868.9875	BODY	7/800		CW		P14 T5 B1 A1	15	35	Zoom	1.680	-0.446	-0.940	1.000	1.000	50.000	1.156
Applicable SAR Limit								Use Group						Limit				
FCC CFR 2.1093			Health Canada Safety Code 6					Occupational/User Aware						8 W/kg				

Table 10.2: Measured Results – TNF FACE- UHF

Measured 1g SAR Results - FACE Configuration																		
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	reported SAR (W/kg)
			Pos	Mode	BW	Mod	BR		DUT (mm)	Antenna (mm)								
XL-200P																		
6/3/2025	F30	430.0125	FACE	UHF		CW		P7 T4 --	25	65	Area	4.010	-0.120	-0.010	1.000	1.070	50.000	2.211
6/3/2025	F30Z	430.0125	FACE	UHF		CW		P7 T4 --	25	65	Zoom	3.670	-0.330	-0.010	1.000	1.070	50.000	2.123
XL-300P																		
3/10/2026	F1	430.0125	FACE	UHF		CW		P7 T4 --	25	65	Area	3.360	-0.180	-0.610	1.000	1.017	50.000	2.049
3/10/2026	F1Z	430.0125	FACE	UHF		CW		P7 T4 --	25	65	Zoom	3.360	0.060	-0.610	1.000	1.017	50.000	1.966
Applicable SAR Limit								Use Group						Limit				
FCC CFR 2.1093		Health Canada Safety Code 6						Occupational/User Aware						8 W/kg				

Table 10.3: Measured Results – TNF BODY- PCS LTE Band 8

Measured 1g SAR Results - BODY Configuration																		
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported</u>
			Pos	Mode	BW	Mod	RB		DUT (mm)	Antenna (mm)								SAR (W/kg)
XL-200P																		
4/16/2025	B112	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Area	1.410	0.610	-0.370	1.000	1.000	100.000	1.535
4/16/2025	B112Z	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Zoom	1.400	-0.070	-0.370	1.000	1.000	100.000	1.549
XL-300P																		
4/14/2026	B5	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Area	1.240	0.240	-0.120	1.000	1.000	100.000	1.275
4/14/2026	B5Z	897.5	BODY	LTE B8/106	10MHz	QPSK	RB1-2	P14 T7 B1 A1	15	35	Zoom	1.320	0.020	-0.120	1.000	1.000	100.000	1.357
Applicable SAR Limit								Use Group						Limit				
FCC CFR 2.1093		Health Canada Safety Code 6						General Population/User Unaware						1.6 W/kg				

Note: In accordance with FCC KDB 941225, additional Resource Block configurations should be investigated when the SAR is greater than 0.8W/kg. These additional Resource Block configurations were evaluated extensively with the XL-200P. Since the SAR of the XL-300P is less than that of the XL-200P, no additional Resource Block configurations were considered.

Table 10.4: Measured Results – TNF FACE- PCS LTE Band 12

Measured 1g SAR Results - FACE Configuration																		
Date	Plot ID	Test Frequency (MHz)	DUT Configuration					Accessories	Spacing		Scan	Measured SAR (W/kg)	SAR Drift (dB)	Delta Power (dB)	Crest Factor (n)	Fluid Sensitivity (n)	Duty Factor (%)	<u>reported SAR (W/kg)</u>
			Pos	Mode	BW	Mod	RB		DUT (mm)	Antenna (mm)								
XL-200P																		
5/30/2025	F210	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 --	25	65	Area	0.089	0.120	-0.090	1.000	1.019	100.000	0.093
5/30/2025	F210Z	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 --	25	65	Zoom	0.048	-0.150	-0.090	1.000	1.019	100.000	0.052
XL-300P																		
4/14/2026	F3	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 --	25	65	Area	0.016	-0.140	-0.210	1.000	1.057	100.000	0.018
4/14/2026	F3Z	710.91	FACE	LTE B12	10MHz	QPSK	RB1-1	P7 T7 --	25	65	Zoom	0.016	0.010	-0.210	1.000	1.057	100.000	0.017
Applicable SAR Limit								Use Group						Limit				
FCC CFR 2.1093			Health Canada Safety Code 6					General Population/User Unaware						1.6 W/kg				

11.0 SCALING OF MAXIMUM MEASURE SAR

Table 11.1a SAR Scaling

Scaling of Maximum Measured SAR (1g)					
Measured Parameters		Configuration			
		Face	Face	Body	Body
Plot ID		F1Z	F3Z	B1Z	B5Z
Maximum Measured SAR _M		3.360	0.016	1.680	1.320
Frequency		430.0125	710.91	868.9875	897.5
Drift	Power Drift	0.060 (1)	0.010 (3)	-0.446	0.020 (9)
Conducted Power		37.390	20.790	34.860	19.880
DC	Transmitter Duty Cycle	(2)	(4)	(7)	(10)
DF	Use Duty Factor	50.0	100.0 (5)	50.0	100.0 (11)
Fluid Deviation from Target					
Δe	Permittivity	7.84%	-0.92%	-2.11%	-8.97%
Δσ	Conductivity	0.00%	-7.66%	9.64%	4.16%
Fluid Sensitivity Calculation (1g) IEC/IEEE 62209-1528 7.8.2					
Delta SAR = Ce * Δe + Cσ * Δσ (8)					
Ce = (-0.0007854*f ³) + (0.009402*f ²) - (0.02742*f) - 0.2026 (9)					
Cσ = (0.009804*f ³) - (0.08661*f ²) + (0.02981*f) + 0.7829 (10)					
f	Frequency (GHz)	0.4300125	0.71091	0.8689875	0.8975
Ce		-0.213	-0.218	-0.220	-0.220
Cσ		0.780	0.764	0.750	0.747
Ce * Δe		-0.017	0.002	0.005	0.020
Cσ * Δσ		0.000	-0.059	0.072	0.031
ΔSAR		-0.017	-0.057	0.077 (6)	0.051 (8) (%)

Table 11.1b SAR Scaling

Scaling of Maximum Measured SAR (1g)						
Measured Parameters		Configuration				
		Face	Face	Body	Body	
Plot ID		F1Z	F3Z	B1Z	B5Z	
Maximum Measured SAR _M		3.360	0.016	1.680	1.320	(W/kg)
Frequency		430.0125	710.91	868.9875	897.5	(MHz)
Drift	Power Drift	0.060 (1)	0.010 (3)	-0.446	0.020 (9)	(dB)
Conducted Power		37.390	20.790	34.860	19.880	(dBm)
DC	Transmitter Duty Cycle	(2)	(4)	(7)	(10)	(%)
DF	Use Duty Factor	50.0	100.0 (5)	50.0	100.0 (11)	(%)
Fluid Deviation from Target						
Δe	Permittivity	7.84%	-0.92%	-2.11%	-8.97%	
Δσ	Conductivity	0.00%	-7.66%	9.64%	4.16%	
Manufacturer's Tuneup Tolerance						
Measured Conducted Power		37.390	20.790	34.860	19.880	(dBm)
Rated Conducted Power		38.000	21.000	35.800	20.000	(dBm)
ΔP		-0.610	-0.210	-0.940	-0.120	(dB)
Transmitter Duty Cycle [Crest Factor]						
Transmitter Duty Cycle (DC)		100.0	100.0	100.0	100.0	(%)
CF (1/DC)		1.00 (2)	1.00 (4)	1.00 (7)	1.00 (10)	
SAR Adjustment for Fluid Sensitivity						
SAR ₁ = SAR _M X [ΔSAR]		3.416	0.016	1.680 (6)	1.320 (8)	(W/kg)
SAR Adjustment for Tuneup Tolerance						
SAR ₂ = SAR ₁ + [ΔP]		3.931	0.017	2.086	1.357	(W/kg)
SAR Adjustment for Drift						
SAR ₃ = SAR ₂ + [Drift]		3.931 (1)	0.017 (3)	2.312	1.357 (9)	(W/kg)
SAR Adjustment for Transmitter Duty Cycle [Crest Factor]						
SAR ₄ = SAR ₃ x [CF]		3.931 (2)	0.017 (4)	2.312 (7)	1.357 (10)	(W/kg)
SAR Adjustment for Use Duty Factor						
SAR ₅ = SAR ₄ x [DF]		1.966	0.017 (5)	1.156	1.357 (11)	(W/kg)
reported 1g SAR						
reported SAR		1.97	0.02	1.16	1.36	(W/kg)

NOTES to Table	
Scaling of the Maximum Measured SAR is based on the highest Face, Body, Extremity and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters, Drift, Conducted Power, Duty Cycle [Crest] and Use Duty Factor apply only to those test frequencies and configurations producing the highest SAR. The <u>reported</u> SAR is the accumulation of all SAR Adjustments from the applicable steps above. The Plot ID is for identification of the SAR Measurement Plot(s) in the Annexes of this report.	
NOTE: The above adjustments have been applied to <u>ALL</u> Measured SAR values. In some cases, the highest Measure SAR may not have produced the highest <u>reported</u> SAR after all adjustments have been made.	
NOTE: Some of the above adjustments may not be applicable to each configuration. They are identified by grayed fields.	
SAR₁	Per IEC/IEEE 62209-1528, FCC KDB 865664, ISSED RSS-102 and ISSED Notice 2012-DRS0529, SAR adjustment is applied when the calculated Δ SAR, resulting from the equations indicated, is negative (-). Δ SAR is given as a percentage (%). The SAR is MULTIPLIED by this scaling factor only when the scaling factor is negative (-).
SAR₂	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, adjustment is required only when the difference (Δ P) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative. Δ P is given in dB. The absolute value of Δ P is ADDED (logarithmically) to the SAR when Δ P is negative (-).
SAR₃	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, adjustment is required only when Measured Drift is negative (-). The absolute value of Measured Drift is ADDED (logarithmically) to the SAR. Drift is given in dB. The absolute value of Drift is ADDED (logarithmically) to the SAR when Drift is negative (-).
SAR₄	Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISSED RSS-102, when the transmit Duty Cycle (DC) is less than 100%, the <u>reported</u> SAR must be scaled to 100% by the Crest Factor (CF). $CF = 1/DC$ where DC is in decimal. CF is given as a decimal. The SAR is MULTIPLIED by this scaling factor only when the scaling factor is greater than 1.
SAR₅	Use Duty Factor applies to Push-To-Talk (PTT) transceivers or other devices whereby the user has some control of the transmitter on-off period. Per IEC/IEEE 62209-1528, FCC KDB 447498, FCC KDB 643646 and ISSED RSS-102, a Duty Factor (DF) of 50% may be applied. In cases where Voice Activated transmit is employed, a DF of 75% may be applied. DF is given as a percentage (%). The SAR is MULTIPLIED by this scaling factor only when the scaling factor is less than 100%.
<u>reported</u> SAR	The <u>reported</u> SAR is the Maximum SAR after all applicable adjustments have been made and is indicated on the cover page of this report.

- Note (1): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISSED Notice 2012-DRS0529
 Note (2): SAR was Evaluated at the Maximum Tuneup Tolerance. SAR Adjustment is not Required.
 Note (3): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (4): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (5): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISSED Notice 2012-DRS0529
 Note (6): Power Drift is Positive, Drift Adjustment not Required.
 Note (7): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (8): Use Duty Factor is 100%. No Duty Factor Correction applied.
 Note (9): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISSED Notice 2012-DRS0529
 Note (10): Power Drift is Positive, Drift Adjustment not Required.
 Note (11): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (12): Use Duty Factor is 100%. No Duty Factor Correction applied.
 Note (13): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISSED Notice 2012-DRS0529
 Note (14): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (15): Use Duty Factor is 100%. No Duty Factor Correction applied.
 Note (16): Crest Factor = 1 (100% Duty Cycle), Crest Factor Adjustment not Required.
 Note (17): Use Duty Factor is 100%. No Duty Factor Correction applied.
 Note (18): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISSED Notice 2012-DRS0529

Simultaneous Transmission Analysis

Introduction

The XL-300P incorporates a WiFi/Bluetooth transceiver and pre-certified LTE transceiver module, all capable of simultaneously transmission in any combination with the LMR transmitter. The 2.4GHz WiFi/BT transceiver is not capable of simultaneous transmission with the 5GHz UNII transceiver. As per FCC KDB 447498 and RSS-102, simultaneous transmission analysis is required for devices capable of simultaneous transmission. The WiFi/BT and LTE 1g SAR are subject to General Population limits of 1.6W/kg. The LMR 1g SAR is subject to Occupational limits of 8.0W/kg. To determine compliance when different SAR limits are applied to the different transmit modes, the Sum-of-the-Ratios of the SAR to the respective SAR limit are applied. When the Sum-of-the-Ratios is ≤ 1.0 , simultaneous SAR test exclusion may be applied.

SAR for each transmission band, transmission mode and/or equipment class was evaluated with Body-Worn and Audio Accessories in the BODY and FACE configurations. Only the Maximum reported SAR for each band and equipment class is used in the Sum-of-the-Ratios calculation and the worst case of all possible combinations is considered.

Table 11.3 List of Possible Simultaneous Transmitter Combinations

Simultaneous Transmitter Combinations				
Worst Case FACE and BODY Configuration				
Transmitter Type				
TNF	DSS	DTS	U-NII	PCS
X	X			X
X		X		X
X			X	X

Table 11.4 Sum of the Ratios Analysis

Analysis of Sum-of-the-Ratios LMR, 802.x, LTE For All Simultaneous Transmitters Configurations																		
Config.	Transmitter Type															Sum of Ratios	Sum of SARs (W/kg)	Sum Limit (W/kg)
	LMR (TNF)			BlueTooth (DSS)			WiFi 2.4 (DTS)			WiFi 5 (U-NII)			LTE (PCS)					
	Standalone SAR (W/kg)	Limit (W/kg)	Ratio to Limit	Standalone SAR (W/kg)	Limit (W/kg)	Ratio to Limit	Standalone SAR (W/kg)	Limit (W/kg)	Ratio to Limit	Standalone SAR (W/kg)	Limit (W/kg)	Ratio to Limit	Standalone SAR (W/kg)	Limit (W/kg)	Ratio to Limit			
FACE	1.970	8.000	0.246	0.016	1.600	0.010							0.020	1.600	0.013	0.269	2.006	8.0
	1.970	8.000	0.246				0.016	1.600	0.010				0.020	1.600	0.013	0.269	2.006	
	1.970	8.000	0.246							0.165	1.600	0.103	0.020	1.600	0.013	0.362	2.155	
BODY	1.160	8.000	0.145	0.001	1.600	0.001							1.360	1.600	0.850	0.996	2.521	
	1.160	8.000	0.145				0.000	1.600	0.000				1.360	1.600	0.850	0.995	2.520	
	1.160	8.000	0.145							0.002	1.600	0.001	1.360	1.600	0.850	0.996	2.522	

Since the sum of the ratios exceeds 1.0 in the Body configuration, simultaneous transmission SAR is considered and the highest SAR resulting from the sum of the SARs is the reported Simultaneous SAR.

12.0 SAR EXPOSURE LIMITS

Table 12.1 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure ⁽⁴⁾	Occupational / Controlled Exposure ⁽⁵⁾
Spatial Average⁽¹⁾ (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak⁽²⁾ (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak⁽³⁾ (Hands/Wrists/Feet/Ankles averaged over 10 g)		4.0 W/kg	20.0 W/kg
(1) The Spatial Average value of the SAR averaged over the whole body.			
(2) 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.			
(3) 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.			
(4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.			
(5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.			

13.0 DETAILS OF SAR EVALUATION

13.1 Day Log

DAY LOG					Fluid Dielectric	SPC	Test	Task
Date	Ambient Temp (°C)	Fluid Temp (°C)	Relative Humidity (%)	Barometric Pressure (kPa)				
3/9/2026	22.5	22.2	29%	101.2	X			450Mhz
3/10/2026	23.1	22.6	23%	101.8		X	X	450Mhz
3/11/2026	24.2	24.0	28%	101.8	X	X	X	835Mhz
4/14/2026	24.8	23.8	25%	100.4	X	X	X	835Mhz
4/14/2026	23.5	22.7	25%	100.3	X	X	X	750Mhz

13.2 DUT Setup and Configuration

DUT Setup and Configuration	
Overview	The XL-300P was evaluated for <i>Body</i> and <i>Face</i> SAR at the maximum conducted output power level, preset by the manufacturer, with a fully charged battery in unmodulated continuous transmit operation (at 100% duty cycle) with the transmit key continuously depressed for LMR mode. For a Push-To-Talk (PTT) device with a manually operated transmit pushbutton, a 50% duty cycle compensation for the <u>reported SAR</u> was used, as per FCC KDB 447498 (6.1). For the digital signals WiFi, BT and LTE, the device is set-up using firmware commands at 100% duty cycle.

13.3 DUT Positioning

DUT Positioning	
Positioning	The DUT Positioner was securely fastened to the Phantom Platform. Registration marks were placed on the DUT and the Positioner to ensure consistent positioning of the DUT for each test evaluation.
FACE Configuration	The DUT was securely clamped into the device holder with the surface of the DUT normally held to the user's face facing the phantom. The device holder was adjusted to ensure that the horizontal axis of the DUT was parallel to the bottom of the phantom. A 25mm spacer block was used to set the separation distance between the DUT and the phantom to 25mm. When applicable and unless by design, the antenna of the DUT was prevented from sagging away from the phantom. The spacer block was removed before testing.
BODY Configuration	Body-Worn and Audio Accessories were affixed to the DUT in the manner in which they are intended to be used. The DUT, with its accessories, were securely clamped into the device holder with the surface of the DUT normally in contact with the body in direct contact with the bottom of the phantom, or 0mm separation from the DUT's accessory to the phantom. Body-Worn Accessory straps, linkages, etc. were positioned in a fashion resembling that for which they were intended to be used. Audio Accessory cables, etc., were positioned in a fashion resembling that for which they were intended to be used.
HEAD Configuration	This device is not intended to be held to the ear and was not tested in the HEAD configuration.

13.4 General Procedures and Report

General Procedures and Reporting	
General Procedures	The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to $\pm 0.5^{\circ}\text{C}$. The Active TSL temperature was maintained to within $\pm 2.0^{\circ}\text{C}$ throughout the test series. The liquid parameters shall be measured within 24 hours before the start of a test series and if it takes longer than 48 hours, the liquid parameters shall also be measured at the end of the test series. An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the <u>Maximum Distance to Phantom Surface</u> to the fluid surface was performed following the power drift measurement.
Reporting	The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the 100% DC (Duty Cycle) column are the SAR values reported by the SAR Measurement Server with the DUT operating at 100% transmit duty cycle. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance. In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY configuration, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are <u>ONLY</u> scaled up, not down. The final results of this scaling is the <u>reported SAR</u> which appears on the Cover Page of this report.

13.5 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
Fluid Dielectric Measurement Procedure	The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running April Dielectric Property Measurement System. A frequency range of $\pm 100\text{MHz}$ for frequencies $> 300\text{MHz}$ and $\pm 50\text{MHz}$ for frequencies $\leq 300\text{MHz}$ with frequency step size of 10MHz is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at 23°C in a 300ml beaker) method. A sample of the TSL is placed in a 300ml beaker and the open-ended coax is submerged approximately 8mm below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the IEC/IEEE 62209-1528 targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are $> 5\%$ in range that the DUT is to be tested. If the adjustments fail to bring the parameters to $\leq 5\%$ but are $< 10\%$, the SAR Fluid Sensitivity as per IEC/IEEE 62209-1528 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters $> 10\%$ in the DUT test frequency range are not used.
Systems Performance Check	The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the 10MHz step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the 10MHz step intervals. A Systems Performance Check (SPC) is performed in accordance with IEC/IEEE 62209-1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the 1g and 10g SAR is measured. The measured 1g and 10g SAR is compared to the 1g and 10g SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to 1.0W and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is $\leq 10\%$ of the measured and normalize SAR of the validation source's Calibration Certificate. The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than 84 hours or if the Active TSL temperature has exceed $\pm 1^{\circ}\text{C}$ of the initial fluid analysis.

13.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	$4 \pm 1 \text{ mm}$
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	$5^{\circ} \pm 1^{\circ}$
Area Scan Spatial Resolution $\Delta X, \Delta Y$	15 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	7.5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	$150 \pm 5 \text{ mm}$
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

14.0 MEASUREMENT UNCERTAINTIES

Table 14.1 Measurement Uncertainty 300 – 3000MHz

Uncertainty Budget for Device Evaluation (IEC/IEEE 62209-1528 Table 9) - 300MHz to 3GHz									
Symbol	Input quantity Xi (source of uncertainty)	Ref.	Prob. Dist PDFi	Unc. a(xi)	Div. a qi	u(xi) = a(xi)/qi	ci	u(y) = ci·u(xi)	vi or veff
Measurement System Errors									
CF ⁽¹⁾	Probe calibration	8.4.1.1	N (k = 2)	± 13.3 %	2	6.65	1	6.65	∞
CFdrift ⁽²⁾	Probe calibration drift	8.4.1.2	R	± 1.7 %	√3	0.981495	1	0.981495	∞
LIN ⁽³⁾	Probe linearity and detection limit	8.4.1.3	R	± 4.7 %	√3	2.713546	1	2.713546	∞
BBS ⁽⁴⁾	Broadband signal	8.4.1.4	R	± 2.0 %	√3	1.154701	1	1.154701	∞
ISO ⁽⁵⁾	Probe isotropy	8.4.1.5	R	± 10.7 %	√3	6.166101	1	6.166101	∞
DAE ⁽⁶⁾	Probe and data acquisition errors	8.4.1.6	N	± 1.2 %	1	1.24	1	1.24	∞
AMB ⁽⁷⁾	RF ambient and noise	8.4.1.7	N	± 1.8 %	1	1.8	1	1.8	10
Δ xyz ⁽⁸⁾	Probe positioning errors	8.4.1.8	N	± 0.6 %	1	0.6	0.14	0.084	∞
DAT ⁽⁹⁾	Data processing errors	8.4.1.9	R	± 2.0 %	√3	1.154701	1	1.154701	∞
Phantom and device (DUT or validation antenna) errors									
LIQ(σ)	Measurement of conductivity(σ)	8.4.2.1	N	± 5.0 %	1	5	1	5	10
LIQ(T c)	Temperature effects (medium)	8.4.2.2	R	± 0.4 %	√3	0.23094	1	0.23094	10
EPS ⁽¹⁰⁾	Shell permittivity	8.4.2.3	R	± 14.0 %	√3	8.082904	0	0	∞
DIS ⁽¹¹⁾	Radiating element of the DUT to phantom	8.4.2.4	N	± 2.0 %	1	2	2	4	∞
D xyz	DUT Positioning Repeatability	8.4.2.5	N	± 2.9 %	1	2.9	1	2.9	15
H	Device holder effects	8.4.2.6	N	± 1.0 %	1	1	1	1	∞
MOD ⁽¹²⁾	Mode to probe sensitivity	8.4.2.7	R	± 2.4 %	√3	1.385641	1	1.385641	∞
TAS ⁽¹³⁾	Time-average SAR	8.4.2.8	R	± 1.0 %	√3	0.57735	1	0.57735	∞
RFdrift ⁽¹⁴⁾	DUT Drift	8.4.2.9	N	± 0.0 %	1	0	1	0	∞
Corrections to the SAR result (if applied)									
C(ε',σ) ⁽¹⁵⁾	Phantom deviation from target (ε',σ)	8.4.3.1	N	± 1.9 %	1	1.9	1	1.9	
C(R)	SAR scaling	8.4.3.2	R	± 4.8 %	√3	2.771281	1	2.771281	
Effective Degrees of Freedom ⁽¹⁶⁾								v_{eff} =	385
u(ΔSAR) Combined uncertainty								12.73	
U Expanded uncertainty k=2								25.46	

(1) From Probe Calibration Certificate

(2) Reference DASY 6 Manual (5 April 2022) §6.1.2

(3) Reference DASY 6 Manual (5 April 2022) §6.1.4

(4) Frequency Dependent - Reference DASY 6 Manual (5 April 2022) §6.1.5

(5) Reference DASY 6 Manual (5 April 2022) §6.1.6, Axial: ±4.7%, Hemispherical: ±9.6%, $ISO = \sqrt{0.5\mu_A^2 + 0.5\mu_H^2}$

(6) Frequency Dependent - Reference DASY 6 Manual (5 April 2022) §6.1.3, Includes Probe Readout Electronics, Boundary Effects and Sensor Of

(7) Reference DASY 6 Manual (5 April 2022) §6.1.7

(8) Reference DASY 6 Manual (5 April 2022) §6.1.8

(9) Reference DASY 6 Manual (5 April 2022) §6.1.9

(10) Reference DASY 6 Manual (5 April 2022) §6.1.12

(11) Reference DASY 6 Manual (5 April 2022) §6.1.13

(12) Reference DASY 6 Manual (5 April 2022) §6.1.16

(13) Reference DASY 6 Manual (5 April 2022) §6.1.17

(14) SAR is adjusted for all negative drift

(15) SAR is adjusted for fluid sensitivity

(16) The Effective Degrees of Freedom is > 30

All other uncertainty contributions assessed in accordance with IEC/IEEE 62209-1528

Table 14.2 Calculation of Degrees of Freedom

Calculation of the Degrees and Effective Degrees of Freedom	
$v_i = n - 1$	$v_{\text{eff}} = \frac{u_c^4}{m \sum_{i=1} \frac{c_i^4 u_i^4}{v_i}}$

15.0 FLUID DIELECTRIC PARAMETERS

Table 15.1 Fluid Dielectric Parameters 450MHz HEAD TSL

FLUID DIELECTRIC PARAMETERS								Fluid Sensitivity Calculation IEC/IEEE 62209-1528 7.8.2			
Date:	9-Mar-2026	Fluid Temp:	23.2	Frequency:	450MHz	Tissue:	Head	ΔSAR 1g	ΔSAR 10g	SAR Correction Factor (1)	
Freq (MHz)		Test ε	Test σ (S/m)	Target ε	Target σ (S/m)	Deviation Permittivity	Deviation Conductivity			1g	10g
430.0000		47.1700	0.8700	43.7400	0.87	7.84%	0.00%	-0.017	-0.012	1.017	1.012
430.0125	*	47.1694	0.8700	43.7399	0.87	7.84%	0.00%	-0.017	-0.012	1.017	1.012
440.0000		46.6900	0.8800	43.6200	0.87	7.04%	1.15%	-0.006	-0.003	1.006	1.003
450.0000		46.4000	0.8900	43.5000	0.87	6.67%	2.30%	0.004	0.005	1.000	1.000

*Channel Frequency Tested

Table 15.2 Fluid Dielectric Parameters 835MHz HEAD TSL

FLUID DIELECTRIC PARAMETERS								Fluid Sensitivity Calculation IEC/IEEE 62209-1528 7.8.2			
Date:	11-Mar-2026	Fluid Temp:	24	Frequency:	835MHz	Tissue:	Head	ΔSAR 1g	ΔSAR 10g	SAR Correction Factor (1)	
Freq (MHz)		Test ε	Test σ (S/m)	Target ε	Target σ (S/m)	Deviation Permittivity	Deviation Conductivity			1g	10g
835.0000		41.4200	0.9800	41.5000	0.90	-0.19%	8.89%	0.067	0.053	1.000	1.000
865.0000		40.7200	1.0200	41.5000	0.93	-1.88%	9.68%	0.077	0.060	1.000	1.000
868.9875	*	40.6243	1.0240	41.5000	0.93	-2.11%	9.64%	0.077	0.060	1.000	1.000
875.0000		40.4800	1.0300	41.5000	0.94	-2.46%	9.57%	0.077	0.060	1.000	1.000

*Channel Frequency Tested

Table 15.3 Fluid Dielectric Parameters 835MHz HEAD TSL

FLUID DIELECTRIC PARAMETERS								Fluid Sensitivity Calculation IEC/IEEE 62209-1528 7.8.2			
Date:	14-Apr-2026	Fluid Temp:	23.8	Frequency:	835MHz	Tissue:	Head	ΔSAR 1g	ΔSAR 10g	SAR Correction Factor (1)	
Freq (MHz)		Test ε	Test σ (S/m)	Target ε	Target σ (S/m)	Deviation Permittivity	Deviation Conductivity			1g	10g
835.0000		38.4800	0.9600	41.5000	0.90	-7.28%	6.67%	0.066	0.050	1.000	1.000
895.0000		37.7800	1.0000	41.5000	0.96	-8.96%	4.17%	0.051	0.037	1.000	1.000
897.5000	*	37.7775	1.0025	41.5000	0.96	-8.97%	4.16%	0.051	0.037	1.000	1.000
905.0000		37.7700	1.0100	41.5000	0.97	-8.99%	4.12%	0.051	0.037	1.000	1.000

*Channel Frequency Tested

Table 15.4 Fluid Dielectric Parameters 750MHz HEAD TSL

FLUID DIELECTRIC PARAMETERS								Fluid Sensitivity Calculation IEC/IEEE 62209-1528 7.8.2			
Date:	14-Apr-2026	Fluid Temp:	22.7	Frequency:	750MHz	Tissue:	Head	ΔSAR	ΔSAR	SAR Correction	
Freq (MHz)		Test ε	Test σ (S/m)	Target ε	Target σ (S/m)	Deviation Permittivity	Deviation Conductivity	1g	10g	Factor (1)	
										1g	10g
710.0000		41.7700	0.8200	42.1500	0.89	-0.90%	-7.87%	-0.058	-0.048	1.058	1.048
710.9100	*	41.7582	0.8218	42.1455	0.89	-0.92%	-7.66%	-0.057	-0.047	1.057	1.047
720.0000		41.6400	0.8400	42.1000	0.89	-1.09%	-5.62%	-0.040	-0.033	1.040	1.033
750.0000		41.3000	0.8800	41.9400	0.89	-1.53%	-1.12%	-0.005	-0.005	1.005	1.005

*Channel Frequency Tested

16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.1 System Verification Results 450MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
3/10/2026		450	D450V3	1068	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	22.2	23	29%	250	15
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
46.40	43.50	6.67%	0.89	0.87	2.30%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
1.07	1.15	-6.96%	0.74	0.771	-3.50%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
4.28	4.63	-7.56%	2.98	3.10	-4.00%
Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEC/IEEE 62209-1528 and FCC KDB 865664, The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer. The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value. The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.					

Table 16.2 System Verification Results 835MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
3/11/2026		835	D835V2	4d075	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	24.0	24	28%	250	15
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
41.42	41.50	-0.19%	0.98	0.90	8.89%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
10.10	9.75	3.59%	6.66	6.34	5.05%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
10.10	9.75	3.59%	6.66	6.34	5.05%
Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEC/IEEE 62209-1528 and FCC KDB 865664, The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer. The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value. The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.					

Table 16.3 System Verification Results 835MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
4/14/2026		835	D835V2	4d075	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	23.8	25	25%	250	15
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
38.48	41.50	-7.28%	0.96	0.90	6.67%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
10.20	9.75	4.62%	6.66	6.34	5.05%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
10.20	9.75	4.62%	6.66	6.34	5.05%
Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEC/IEEE 62209-1528 and FCC KDB 865664, The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer. The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value. The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.					

Table 16.4 System Verification Results 750MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
4/14/2026		750	D750V3	1061	
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	22.7	24	25%	250	15
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
41.30	41.94	-1.53%	0.88	0.89	-1.12%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
2.12	2.23	-4.93%	1.42	1.45	-2.07%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
8.48	8.88	-4.50%	5.68	5.77	-1.56%
Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEC/IEEE 62209-1528 and FCC KDB 865664, The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer. The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value. The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.					

17.0 SYSTEM VALIDATION SUMMARY

Table 17.1 System Validation Summary

System Validation Summary												
Frequency (MHz)	Validation Date	Probe Model	Probe S/N	Validation Source	Source S/N	Tissue	Tissue Dielectrics		Validation Results			Modulation
							Permittivity	Conductivity	Sensitivity	Linearity	Isotropy	
450	2-Jun-25	EX3DV4	7826	D450V3	1068	Head	46.71	0.83	✓	✓	✓	CW
750	29-May-25	EX3DV4	7826	D750V3	1061	Head	41.94	0.92	✓	✓	✓	CW/QPSK
835	5-Jun-25	EX3DV4	7826	D835V2	4d075	Head	38.82	0.99	✓	✓	✓	CW/QPSK

18.0 MEASUREMENT SYSTEM SPECIFICATIONS

Measurement System Specification	
Specifications	
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	+/- 0.035 mm
No. of axis	6.0
Data Acquisition Electronic (DAE) System	
Cell Controller	
Processor	Intel(R) Core(TM) i7-7700
Clock Speed	3.60 GHz
Operating System	Windows 10 Professional
Data Converter	
Features	Signal Amplifier, multiplexer, A/D converter, and control logic
Software	Measurement Software: DASY6, V 6.4.0.12171 / DASY52 V10.2(1504)
	Postprocessing Software: SEMCAD X, V14.6.12(7470)
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock
DASY Measurement Server	
Function	Real-time data evaluation for field measurements and surface detection
Hardware	Intel ULV Celeron CPU 400 MHz; 128 MB chip disk; 128 MB RAM
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface
E-Field Probe	
Model	EX3DV4
Serial No.	7826
Construction	Triangular core fiber optic detection system
Frequency	10 MHz to 6 GHz
Linearity	±0.2 dB (30 MHz to 3 GHz)
Phantom	
Type	ELI Elliptical Planar Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	> 30 Liter
Phantom	
Type	Twin SAM Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	< 25 Liter
Phantom	
Type	Modular Flat Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	< 9 Liter

Table 18.1 Measurement System Specifications

Table 18.1		
Measurement System Specification (Continued)		
Probe Specification		
Construction:	Symmetrical design with triangular core; Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents (e.g. DGBE))	
Calibration:	ISO/IEC 17025	
Frequency:	4 MHz - 10 GHz; Linearity: ± 0.2 dB (30 MHz - 10 GHz)	
Directivity:	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range:	10 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB (noise: typically <1 mW/g)	
Dimensions:	Overall length: 337 mm; (tip: 20 mm) Tip diameter: 2.5 mm; Tip (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	
Application:	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better than 30%	EX3DV4 E-Field Probe
Phantom Specification		
The ELI V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEC/IEEE 62209-1528.		
		ELI Phantom
Phantom Specification		
The SAM V4.0 phantom is a flat planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEC/IEEE 62209-1528.		
		SAM Phantom
Phantom Specification		
The MFP V5.1C phantom is a flat planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEC/IEEE 62209-1528.		
		MFP Phantom
Device Positioner Specification		
The DASY device positioner 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.		
		Device Positioner

19.0 TEST EQUIPMENT LIST

Table 19.1 Equipment List and Calibration

Test Equipment List				
DESCRIPTION	ASSET NO.	SERIAL NO.	DATE CALIBRATED	CALIBRATION DUE
Schmid & Partner DASY 6 System	-	-	-	-
-DASY Measurement Server	00158	1078	CNR	CNR
-Robot	00046	599396-01	CNR	CNR
-DAE4	00019	353	9-May-25	9-May-26
-EX3DV4 E-Field Probe	00357	7826	15-May-25	15-May-26
-D450V3 Validation Dipole	00221	1068	N/A	13-Apr-26
-D750V3 Validation Dipole	00238	1061	8-May-25	8-May-26
-D835V2 Validation Dipole	00217	4D075	10-May-24	10-May-27
ELI Phantom	00247	1234	CNR	CNR
HP 85070C Dielectric Probe Kit	00033	none	CNR	CNR
HP 8753ET Network Analyzer	00134	US39170292	N/A	6-Jan-27
Rohde & Schwarz SMR20 Signal Generator	00006	100104	COU	COU
Amplifier Research 10W1000C Power Amplifier	00041	27887	CNR	CNR
Amplifier Research 5S1G4 Power Amplifier	00106	26235	CNR	CNR
Narda Directional Coupler 3020A	00064	-	CNR	CNR
Bipolar Power Supply 6299A	00086	1144A02155	CNR	CNR
DC-18G 10W 30db Attenuator	00102	-	COU	COU
R&S FSP40 Spectrum Analyzer	00241	100500	N/A	10-Sep-27
HP 8566B Spectrum Analyzer	00051	2747A055100	N/A	6-Jul-27
RF Cable-SMA	00311	-	CNR	CNR
HP Calibration Kit	00145	-	CNR	CNR

CNR = Calibration Not Required
SB=Stand By
COU = Calibrate on Use

20.0 FLUID COMPOSITION

Table 20.1 Fluid Composition 450MHz HEAD TSL

Tissue Simulating Liquid (TSL) Composition				450MHz Head
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
38.56	56.32	3.95	0.98	0.19

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical DOWICIL 75 Antimicrobial Preservative

Table 20.3 Fluid Composition 750MHz HEAD TSL

Tissue Simulating Liquid (TSL) Composition				750MHz Head
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
40.71	56.63	1.48	0.99	0.19

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical DOWICIL 75 Antimicrobial Preservative

Table 20.4 Fluid Composition 835MHz HEAD TSL

Tissue Simulating Liquid (TSL) Composition				835MHz Head
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
40.71	56.63	1.48	0.99	0.19

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical DOWICIL 75 Antimicrobial Preservative

APPENDIX A – SYSTEM VERIFICATION PLOTS

DUT: D450V3 - SN1068; Type: D450V3; Serial: SN1068

Procedure Name: SPC/SPC 450H, Input 250mW, Target 1g[1.035][1.15][1.265] W/kg 10g [0.6939][0.771][0.8481] 2 2

Communication System: UID 0, CW (0); Frequency: 450 MHz

Medium parameters used: $f = 450$ MHz; $\sigma = 0.89$ S/m; $\epsilon_r = 46.4$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Date/Time: 3/10/2026 11:51:02 AM

DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(10.55, 10.55, 10.55) @ 450 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

SPC/SPC 450H, Input 250mW, Target 1g[1.035][1.15][1.265] W/kg 10g [0.6939][0.771][0.8481] 2 2/Area Scan (6x7x1): Measurement grid: $dx=15$ mm, $dy=15$ mm

SPC/SPC 450H, Input 250mW, Target 1g[1.035][1.15][1.265] W/kg 10g [0.6939][0.771][0.8481] 2 2/Zoom Scan (5x5x7)/Cube 0:

Measurement grid: $dx=7.5$ mm, $dy=7.5$ mm, $dz=5$ mm

Reference Value = 35.86 V/m; Power Drift = -0.04 dB

Peak SAR (extrapolated) = 1.54 W/kg

SAR(1 g) = 1.07 W/kg; SAR(10 g) = 0.744 W/kg

Ratio of SAR at M2 to SAR at M1 = 70.3%

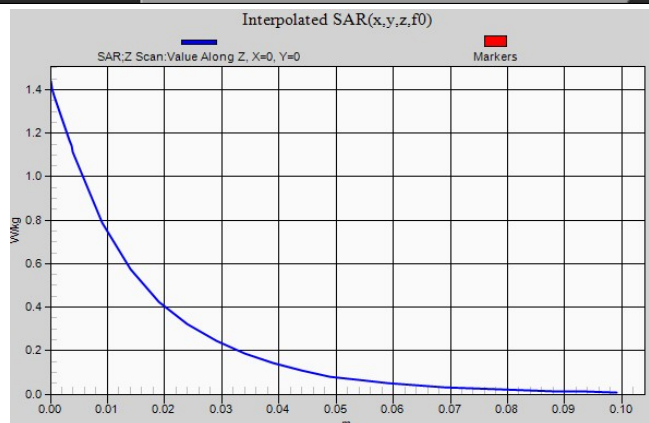
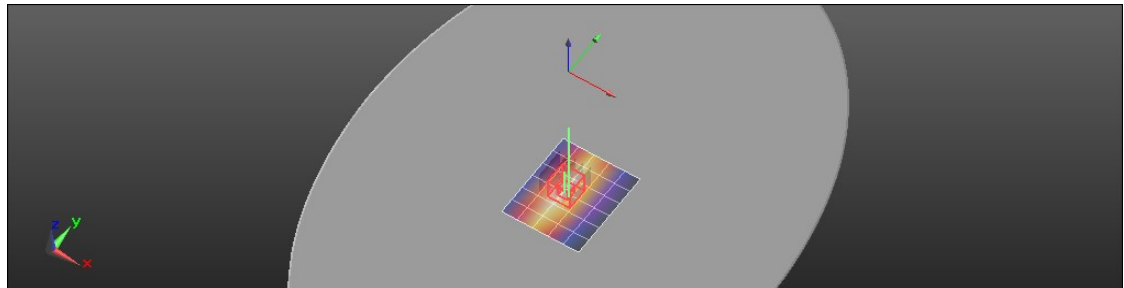
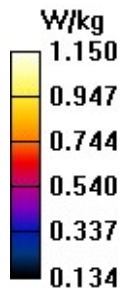
Maximum value of SAR (measured) = 1.15 W/kg

SPC/SPC 450H, Input 250mW, Target 1g[1.035][1.15][1.265] W/kg 10g [0.6939][0.771][0.8481] 2 2/Z Scan (1x1x31): Measurement

grid: $dx=20$ mm, $dy=20$ mm, $dz=5$ mm

Penetration depth = 15.67 (14.46, 16.72) [mm]

Maximum value of SAR (interpolated) = 1.44 W/kg



DUT: Dipole 835 MHz D835V2; Type: D835V2; Serial: D835V2 - SN:4d075
Procedure Name: SPC/SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg

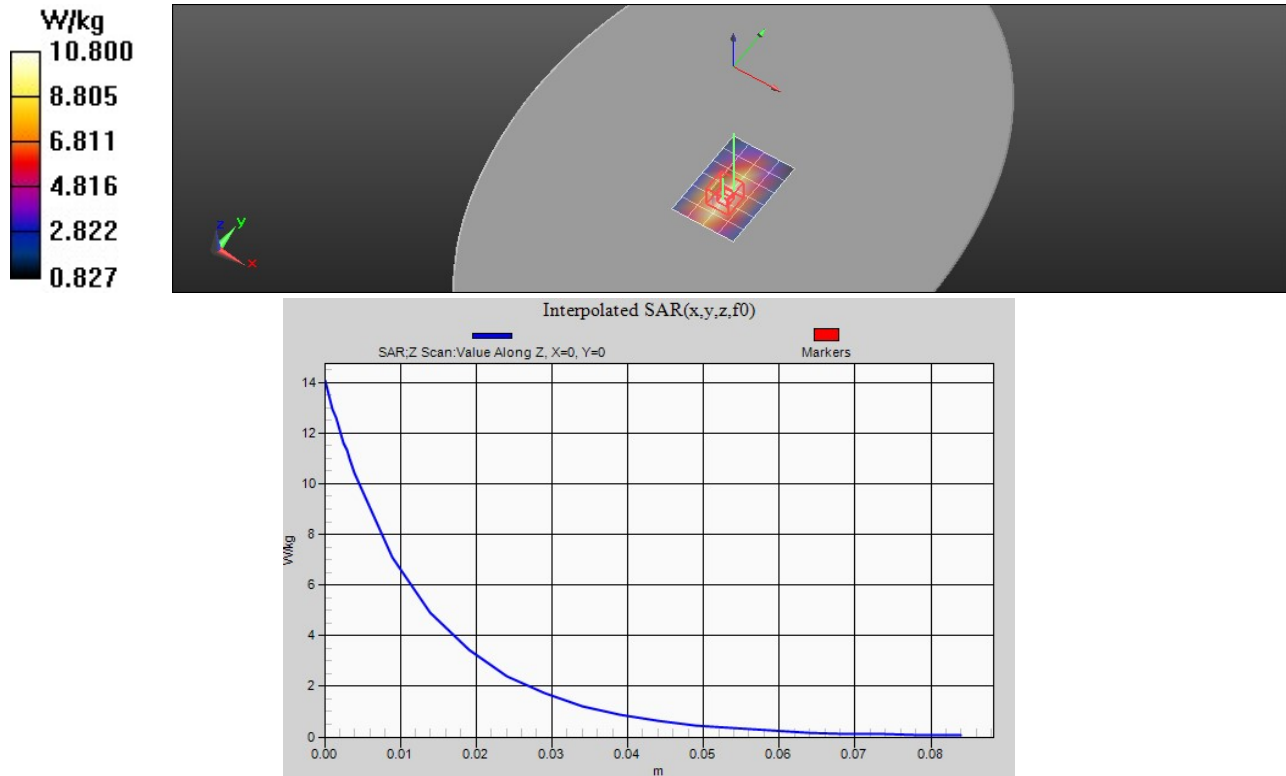
Communication System: UID 0, CW (0); Frequency: 835 MHz
Medium parameters used: $f = 835$ MHz; $\sigma = 0.98$ S/m; $\epsilon_r = 41.42$; $\rho = 1000$ kg/m³
Phantom section: Flat Section
Date/Time: 3/11/2026 2:53:03 PM
DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.28, 8.7, 9) @ 835 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

SPC/SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg/Area Scan (5x7x1): Measurement grid: $dx=15$ mm, $dy=15$ mm

SPC/SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg/Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=7.5$ mm, $dy=7.5$ mm, $dz=5$ mm
Reference Value = 104.0 V/m; Power Drift = -0.03 dB
Peak SAR (extrapolated) = 14.6 W/kg
SAR(1 g) = 10.1 W/kg; SAR(10 g) = 6.66 W/kg
Ratio of SAR at M2 to SAR at M1 = 68%
Maximum value of SAR (measured) = 10.9 W/kg

SPC/SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg/Z Scan (1x1x28): Measurement grid: $dx=20$ mm, $dy=20$ mm, $dz=5$ mm
Penetration depth = 13.45 (13.10, 13.92) [mm]
Maximum value of SAR (interpolated) = 14.1 W/kg



DUT: Dipole 835 MHz D835V2; Type: D835V2; Serial: D835V2 - SN:4d075
Procedure Name: SPC /SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg 2

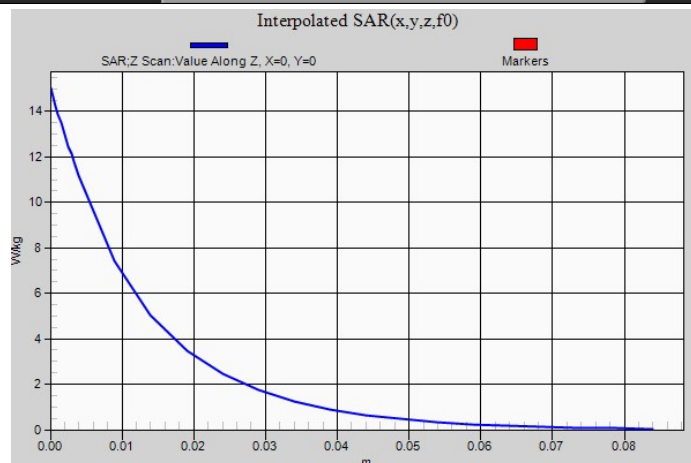
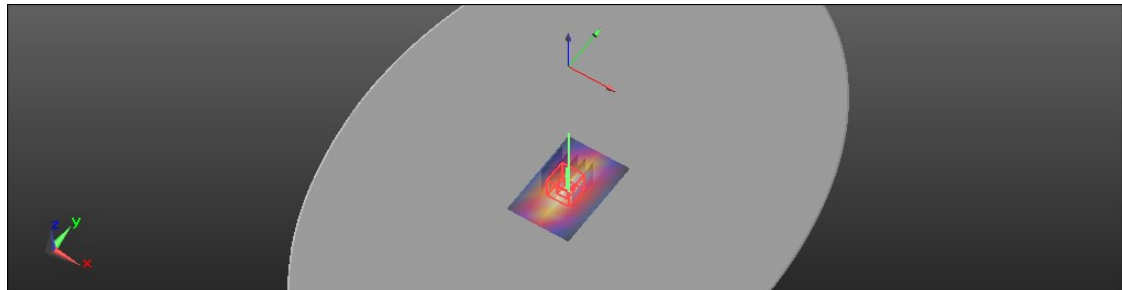
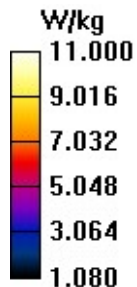
Communication System: UID 0, CW (0); Frequency: 835 MHz
Medium parameters used: $f = 835$ MHz; $\sigma = 0.96$ S/m; $\epsilon_r = 38.48$; $\rho = 1000$ kg/m³
Phantom section: Flat Section
Date/Time: 4/14/2026 5:40:31 PM
DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.28, 8.7, 9) @ 835 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

SPC /SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg 2/Area Scan (5x7x1): Measurement grid: $dx=15$ mm, $dy=15$ mm

SPC /SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg 2/Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=7.5$ mm, $dy=7.5$ mm, $dz=5$ mm
Reference Value = 107.9 V/m; Power Drift = 0.09 dB
Peak SAR (extrapolated) = 15.2 W/kg
SAR(1 g) = 10.2 W/kg; SAR(10 g) = 6.66 W/kg
Ratio of SAR at M2 to SAR at M1 = 66.7%
Maximum value of SAR (measured) = 11.1 W/kg

SPC /SPC - 835H Input=1000mw, Target 1g=[9.75]W/kg [8.775][9.75][10.725]; 10g=6.34W/kg [5.706][6.34][6.974]W/kg 2/Z Scan (1x1x28): Measurement grid: $dx=20$ mm, $dy=20$ mm, $dz=5$ mm
Penetration depth = 12.86 (12.33, 13.55) [mm]
Maximum value of SAR (interpolated) = 15.0 W/kg



DUT: Dipole 750 MHz D750V3; Type: D750V3; Serial: D750V3 - SN:1061

Procedure Name: SPC/SPC 750H, input power 24 dBm (251.19)mW Targets 1g=[2.01][2.23] [2.45]; 10g= [1.305][1.45] [1.595] W/kg_2

Communication System: UID 0, CW (0); Frequency: 750 MHz

Medium parameters used: $f = 750$ MHz; $\sigma = 0.88$ S/m; $\epsilon_r = 41.3$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASy5 (IEEE/IEC/ANSI C63.19-2011)

Date/Time: 4/14/2026 7:59:21 PM

DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.7, 9.09, 9.41) @ 750 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASy52 52.10.3(1513); SEMCAD X 14.6.13(7474)

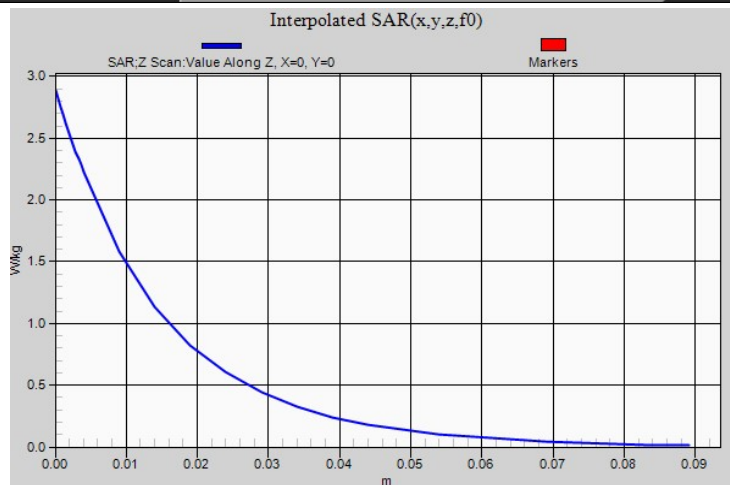
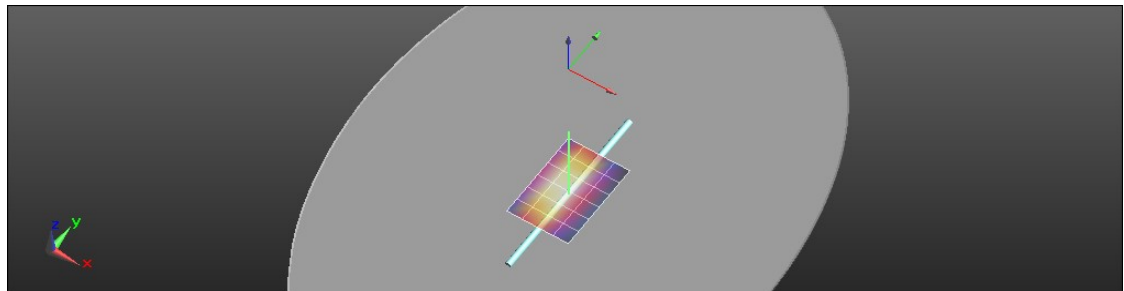
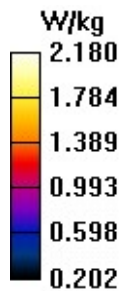
SPC/SPC 750H, input power 24 dBm (251.19)mW Targets 1g=[2.01][2.23] [2.45]; 10g= [1.305][1.45] [1.595] W/kg_2/Area Scan (5x7x1): Measurement grid: dx=15mm, dy=15mm

SPC/SPC 750H, input power 24 dBm (251.19)mW Targets 1g=[2.01][2.23] [2.45]; 10g= [1.305][1.45] [1.595] W/kg_2/Z Scan (1x1x29):

Measurement grid: dx=20mm, dy=20mm, dz=5mm

Penetration depth = 15.14 (14.66, 15.49) [mm]

Maximum value of SAR (interpolated) = 2.88 W/kg



APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

F1Z

DUT: Harris 0179-5; Type: PTT; Serial: A40342F00164
Procedure Name: 450H/F1 - XL-300P 430.0125MHz Face Config, T4,P7

Communication System: UID 0, CW (0); Frequency: 430.012 MHz
Medium parameters used (interpolated): $f = 430.012$ MHz; $\sigma = 0.87$ S/m; $\epsilon_r = 47.169$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

Date/Time: 3/10/2026 2:53:29 PM

DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(10.55, 10.55, 10.55) @ 430.012 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

450H/F1 - XL-300P 430.0125MHz Face Config, T4,P7/Area Scan (7x24x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 3.51 W/kg

450H/F1 - XL-300P 430.0125MHz Face Config, T4,P7/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 60.07 V/m; Power Drift = 0.06 dB

Peak SAR (extrapolated) = 4.17 W/kg

SAR(1 g) = 3.36 W/kg; SAR(10 g) = 2.65 W/kg

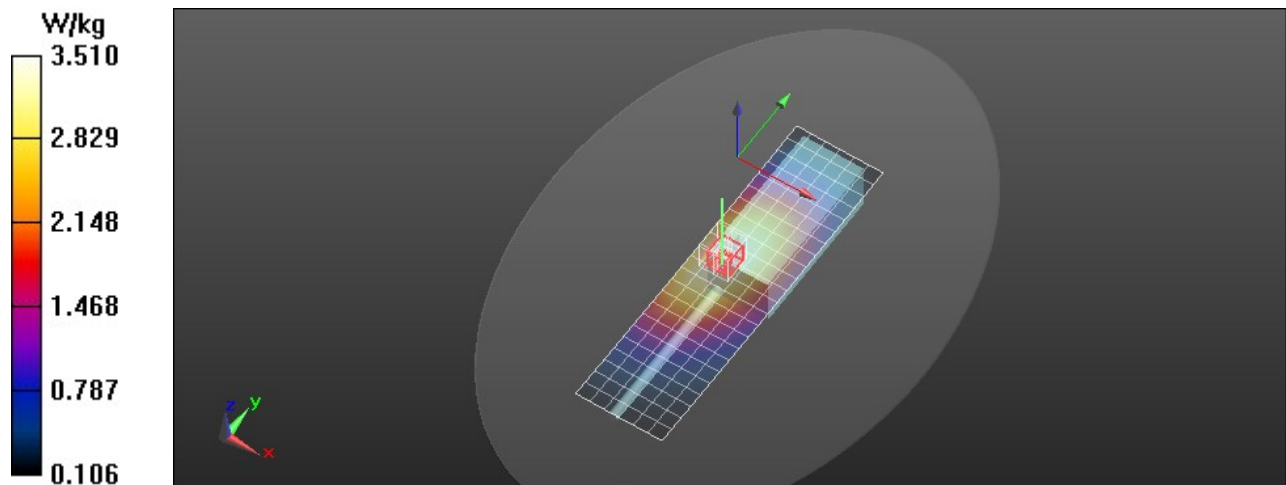
Ratio of SAR at M2 to SAR at M1 = 79.9%

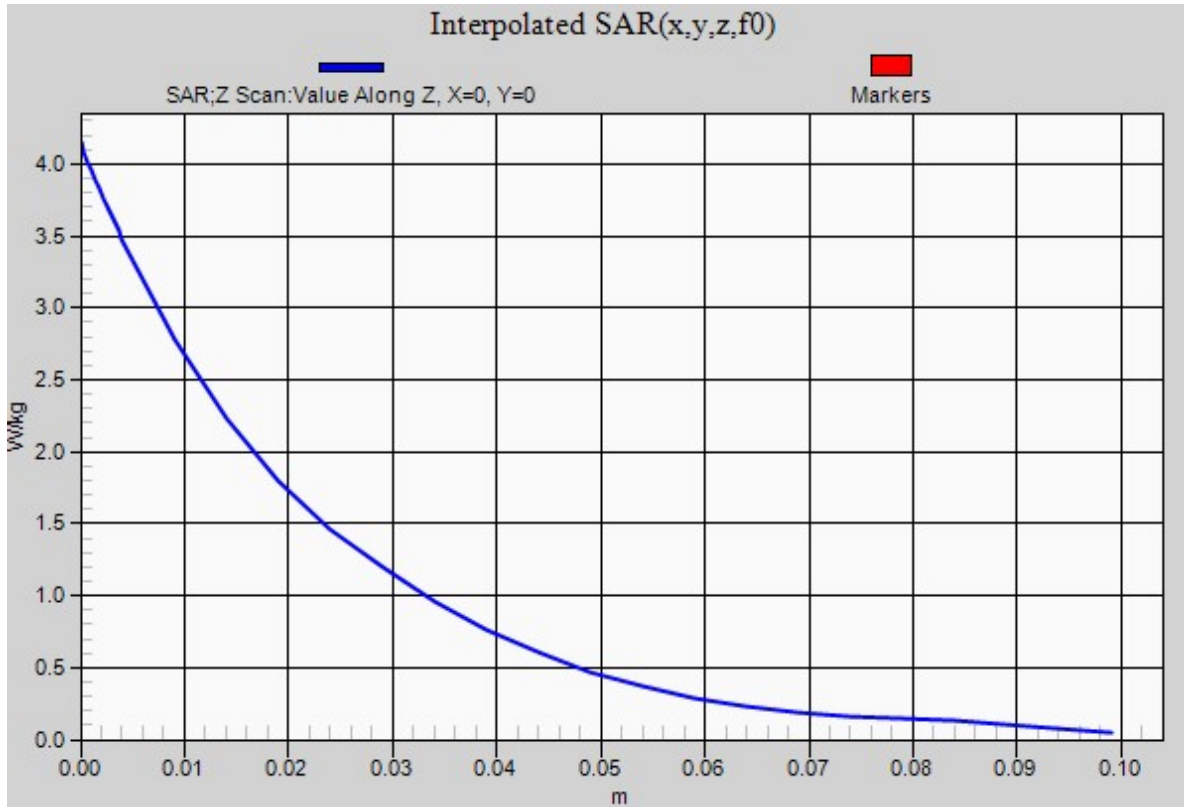
450H/F1 - XL-300P 430.0125MHz Face Config, T4,P7/Z Scan (1x1x31): Measurement grid: dx=20mm, dy=20mm, dz=5mm

Info: Interpolated medium parameters used for SAR evaluation.

Penetration depth = 23.15 (22.21, 23.41) [mm]

Maximum value of SAR (interpolated) = 4.15 W/kg





B1Z

DUT: XL300-P; Type: PTT; Serial: A40342F00164

Procedure Name: 835H/B1 - XL300P LMR 868.9875MHz Body Config, T5,P14,A1,B1

Communication System: UID 0, CW (0); Frequency: 868.987 MHz

Medium parameters used (interpolated): $f = 868.987$ MHz; $\sigma = 1.024$ S/m; $\epsilon_r = 40.624$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

Date/Time: 3/11/2026 4:38:26 PM

DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.19, 8.61, 8.91) @ 868.987 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

835H/B1 - XL300P LMR 868.9875MHz Body Config, T5,P14,A1,B1/Area Scan (7x21x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 1.80 W/kg

835H/B1 - XL300P LMR 868.9875MHz Body Config, T5,P14,A1,B1/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 15.74 V/m; Power Drift = -0.45 dB

Peak SAR (extrapolated) = 2.17 W/kg

SAR(1 g) = 1.68 W/kg; SAR(10 g) = 1.23 W/kg

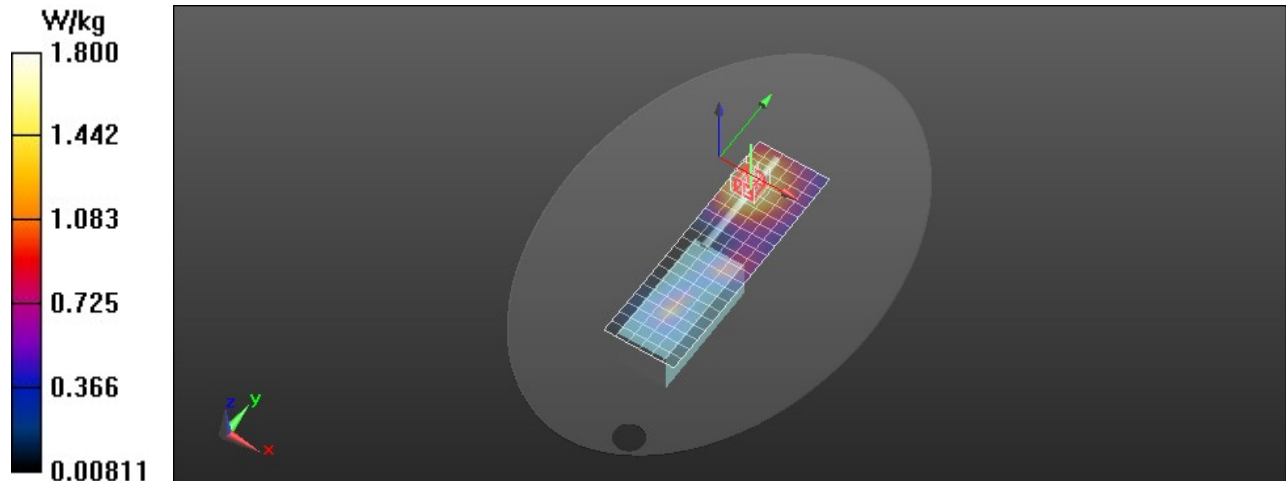
Ratio of SAR at M2 to SAR at M1 = 74.9%

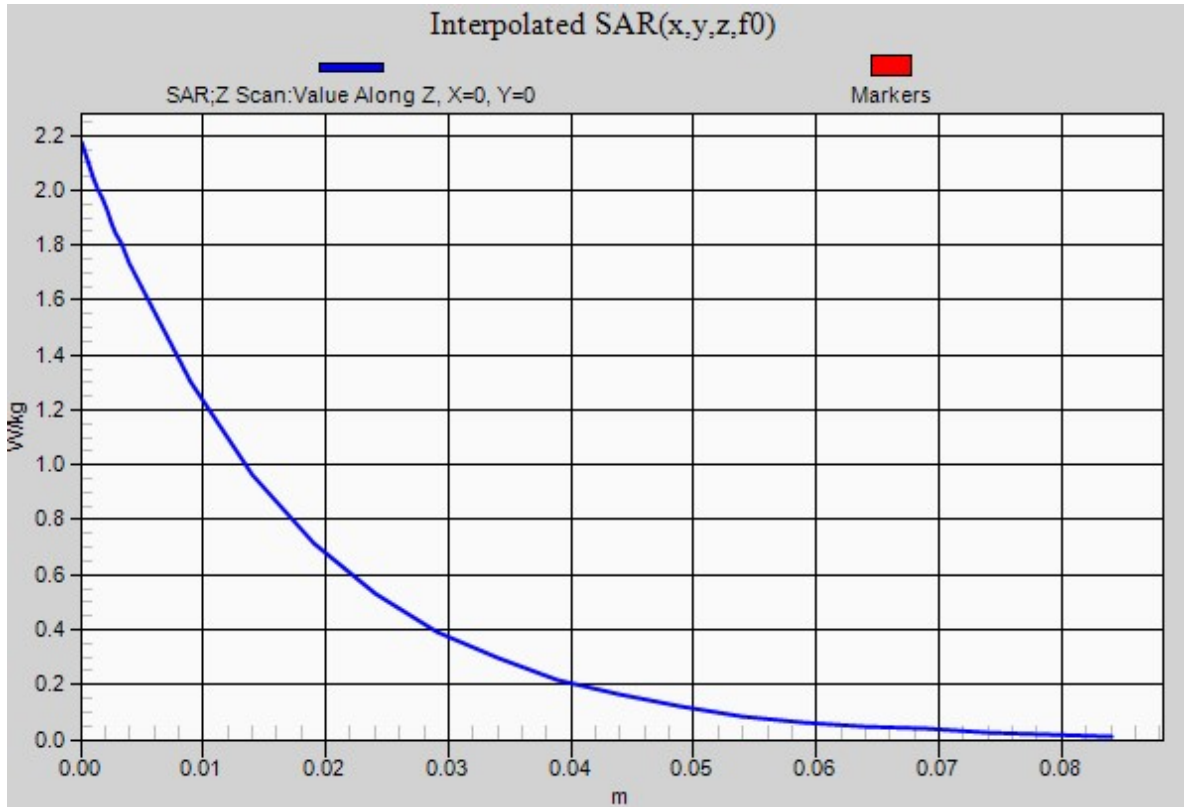
Maximum value of SAR (measured) = 1.77 W/kg

835H/B1 - XL300P LMR 868.9875MHz Body Config, T5,P14,A1,B1/Z Scan (1x1x28): Measurement grid: dx=20mm, dy=20mm, dz=5mm

Penetration depth = 16.61 (17.31, 16.65) [mm]

Maximum value of SAR (interpolated) = 2.17 W/kg





B5Z

DUT: XL300-P; Type: PTT; Serial: A4034FF00077

Procedure Name: 835H/B5 - XL300P LTE 897.5MHz RB1-2 Body Config, T7,P14,A1,B1

Communication System: UID 0, CW (0); Frequency: 897.5 MHz

Medium parameters used (interpolated): $f = 897.5$ MHz; $\sigma = 1.002$ S/m; $\epsilon_r = 37.778$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASy5 (IEEE/IEC/ANSI C63.19-2011)

Date/Time: 4/14/2026 6:43:21 PM

DASy Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.19, 8.61, 8.91) @ 897.5 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASy52 52.10.3(1513); SEMCAD X 14.6.13(7474)

835H/B5 - XL300P LTE 897.5MHz RB1-2 Body Config, T7,P14,A1,B1/Area Scan 2 (7x17x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 1.19 W/kg

835H/B5 - XL300P LTE 897.5MHz RB1-2 Body Config, T7,P14,A1,B1/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 27.27 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 2.28 W/kg

SAR(1 g) = 1.32 W/kg; SAR(10 g) = 0.787 W/kg

Smallest distance from peaks to all points 3 dB below = 14.8 mm

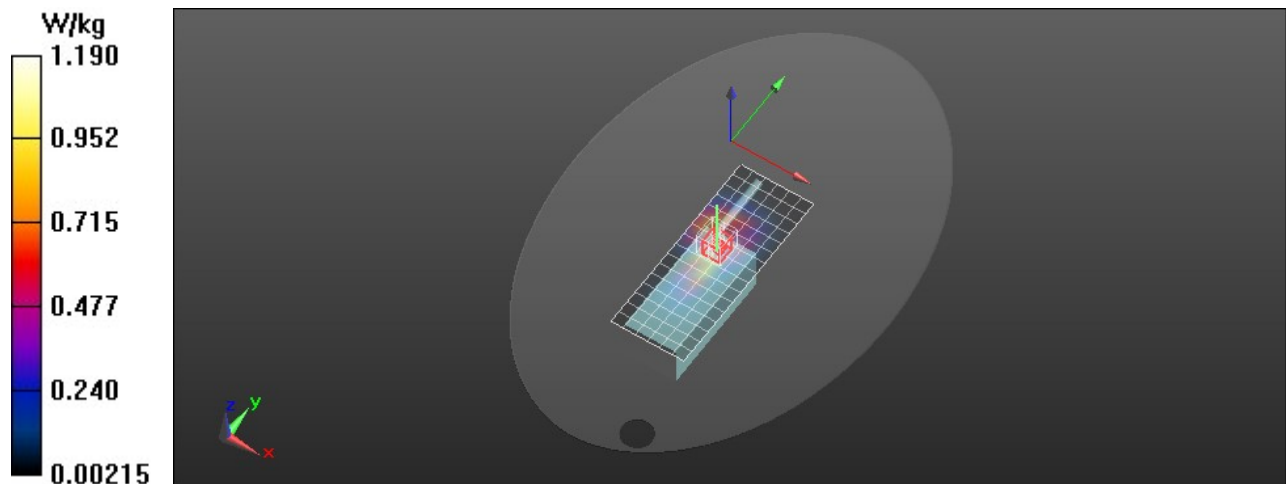
Ratio of SAR at M2 to SAR at M1 = 65.7%

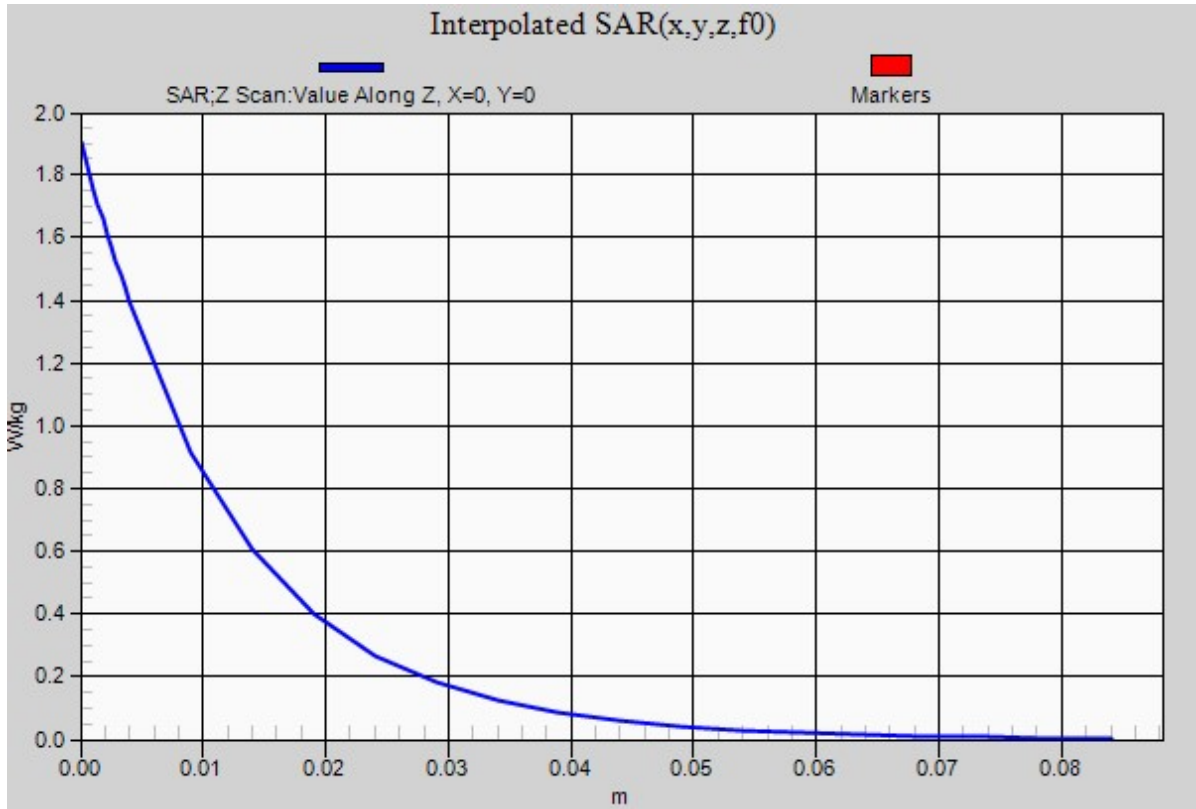
Maximum value of SAR (measured) = 1.40 W/kg

835H/B5 - XL300P LTE 897.5MHz RB1-2 Body Config, T7,P14,A1,B1/Z Scan (1x1x28): Measurement grid: dx=20mm, dy=20mm, dz=5mm

Penetration depth = 11.98 (11.85, 12.22) [mm]

Maximum value of SAR (interpolated) = 1.90 W/kg





F3Z

DUT: XL-300P; Type: PTT; Serial: A4034FF00077

Procedure Name: 750H/F3 XL300-P POWER LTE B12 710.91 MHz RB1-1 Face Config T7, P7

Communication System: UID 0, CW (0); Frequency: 710.9 MHz

Medium parameters used (interpolated): $f = 710.9$ MHz; $\sigma = 0.822$ S/m; $\epsilon_r = 41.758$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Date/Time: 4/14/2026 8:20:50 PM

DASY Configuration:

- Probe: EX3DV4 - SN7826; ConvF(9.7, 9.09, 9.41) @ 710.9 MHz; Calibrated: 5/15/2025
- Sensor-Surface: 4mm (Mechanical Surface Detection), $z = -1.5, 31.0, 151.0$
- Electronics: DAE4 Sn353; Calibrated: 5/13/2025
- Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234
- DASY52 52.10.3(1513); SEMCAD X 14.6.13(7474)

750H/F3 XL300-P POWER LTE B12 710.91 MHz RB1-1 Face Config T7, P7/Area Scan 2 (7x13x1): Measurement grid: dx=15mm, dy=15mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 0.0170 W/kg

750H/F3 XL300-P POWER LTE B12 710.91 MHz RB1-1 Face Config T7, P7/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=7.5mm, dy=7.5mm, dz=5mm

Reference Value = 3.625 V/m; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 0.0200 W/kg

SAR(1 g) = 0.016 W/kg; SAR(10 g) = 0.012 W/kg

Ratio of SAR at M2 to SAR at M1 = 79%

Maximum value of SAR (measured) = 0.0163 W/kg

750H/F3 XL300-P POWER LTE B12 710.91 MHz RB1-1 Face Config T7, P7/Z Scan (1x1x29): Measurement grid: dx=20mm, dy=20mm, dz=5mm

Penetration depth = 18.83 (21.01, 20.90) [mm]

Maximum value of SAR (interpolated) = 0.0197 W/kg

