

SAR TEST REPORT



The following samples were submitted and identified on behalf of the client as:

Equipment Under Test RF Transmitter Module
Brand Name Telit
Model Name UE910-GL
Applicant Laipac Technology Inc.
25 Valleywood Dr Unit 11, Markham, ON L3R 5L9
Standards IEEE/ANSI C95.1-1992, IEEE 1528-2013
FCC ID RI7UE910GL (WWAN), 2AA9B05 (BLE)
Date of Receipt Feb. 21, 2022
Date of Test(s) May. 03, 2022 ~ May. 04, 2022
Date of Issue Mar. 23, 2023

In the configuration tested, the EUT complied with the standards specified above.

Remarks:

This report details the results of the testing carried out on one sample, the results contained in this test report do not relate to other samples of the same product. The manufacturer should ensure that all products in series production are in conformity with the product sample detailed in this report.

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Signed on behalf of SGS

Clerk / Ruby Ou	PM / Tom Chiang	Approved By / John Yeh

Date: Mar. 23, 2023

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Revision History

Report Number	Revision	Description	Issue Date	Revised By	Remark
E5/2022/20020	Rev.00	Initial creation of document	Mar. 23, 2023	Ruby Ou	

Note:

1. The mark " * " is the revised version of the report due to comments submitted by the certification.

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0. Guidance applied

The SAR testing method and procedure for this device is in accordance with the following standards:

IEEE/ANSI C95.1-1992

IEEE 1528-2013

KDB865664D01v01r04

KDB865664D02v01r02

KDB941225D05v02r05

KDB447498D01v06

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1. General Information

1.1 Testing Laboratory

SGS Taiwan Ltd. Central RF Lab	
No. 2, Keji 1st Rd., Guishan Township, Taoyuan County, 33383, Taiwan	
FCC Designation Number	TW0028
Tel	+886-2-2299-3279
Fax	+886-2-2298-0488
Internet	http://www.tw.sgs.com/

1.2 Details of Applicant

Company Name	Laipac Technology Inc.
Company Address	25 Valleywood Dr Unit 11, Markham, ON L3R 5L9

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1.3 Description of EUT

Product Name	RF Transmitter Module		
Brand Name	Telit		
Model Name	UE910-GL		
FCC ID	TET-UE910GL		
Host Information	Product Type: S911 Enforcer Trade Name: S911 Enforcer Model Name: EN105		
Mode of Operation	☒ WCDMA ☒ BLE		
Duty Cycle	WCDMA	1	
	BLE	0.771	
TX Frequency Range (MHz)	WCDMA Band II	1850	— 1910
	WCDMA Band V	824	— 849
	BLE	2402	— 2480

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Next to mouth exposure

Summary of Maximum SAR Value	
Mode	Highest SAR 1g Body (W/kg)
WCDMA Band II	0.96

Summary of Maximum SAR	
Mode	Highest SAR 1g Body (W/kg)
BLE_1M	0.00

Extremity exposure

Summary of Maximum SAR Value	
Mode	Highest SAR 10g Body (W/kg)
WCDMA Band II	1.85

Summary of Maximum SAR	
Mode	Highest SAR 10g Body (W/kg)
BLE_1M	0.00

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WWAN conducted power table :

Band		WCDMA II		
TX Channel		9262	9400	9538
Frequency (MHz)		1852.4	1880	1907.6
Max. Rated Avg. Power+Max. Tolerance (dBm)		23.90		
3GPP Rel 99	RMC 12.2Kbps	22.44	22.33	22.18

Band		WCDMA V		
TX Channel		4132	4183	4233
Frequency (MHz)		826.4	836.6	846.6
Max. Rated Avg. Power+Max. Tolerance (dBm)		23.90		
3GPP Rel 99	RMC 12.2Kbps	23.14	23.05	22.92

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BLE conducted power table:

Mode	Channel	Frequency (MHz)	GFSK	
			Max. Rated Avg.Power + Max. Tolerance (dBm)	Average Output Power (dBm)
BLE_1M	CH 00	2402	-4.08	-4.12
	CH 19	2440	-4.57	-5.07
	CH 39	2480	-5.7	-6.20

Mode	Channel	Frequency (MHz)	GFSK	
			Max. Rated Avg.Power + Max. Tolerance (dBm)	Average Output Power (dBm)
BLE_2M	CH 00	2402	-3.72	-4.22
	CH 19	2440	-4.67	-5.17
	CH 39	2480	-5.83	-6.33

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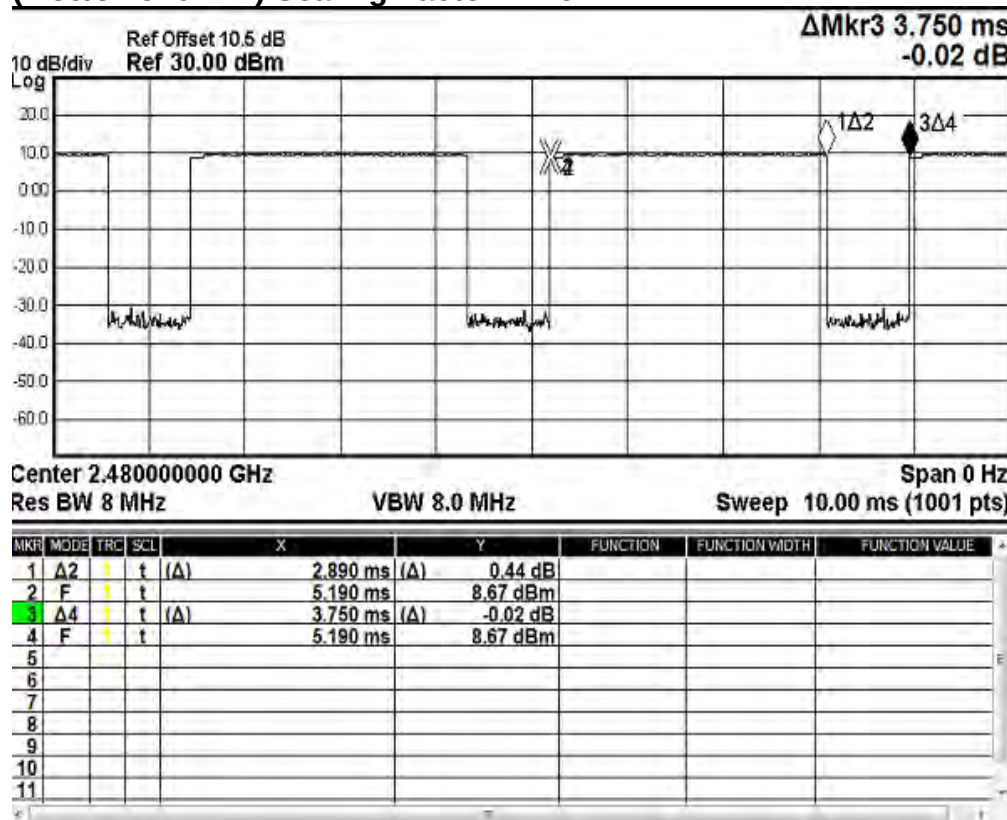
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BLE

(2.89/3.75=0.771) Scaling Factor=1.297



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1.4 Test Environment

Ambient Temperature: $22\pm 2^{\circ}\text{C}$

Tissue Simulating Liquid: $22\pm 2^{\circ}\text{C}$

1.5 Operation Description

1. Use chipset specific software to control the EUT, and makes it transmit in maximum power.
2. Measurements are performed respectively on the lowest, middle and highest channels of the operating band(s). The EUT is set to maximum power level during all tests, and at the beginning of each test the battery is fully charged.
3. During the SAR testing, the DASY 5 system checks power drift by comparing the e-field strength of one specific location measured at the beginning with that measured at the end of the SAR testing.
4. The device is a smart watch with WWAN/BT only, and the antennas are located on the body of watch, not on the watchband. Since there is the voice communication supported by the device, there are extremity exposure (10-g SAR<4) and next to mouth exposure (1g-SAR<1.6) needed to be considered based on KDB447498 D01.
5. For extremity exposure, SAR is measured with the back of the device positioned in direct contact against the neck area of SAM phantom based on FCC guidance.
6. For next to mouth exposure, SAR is evaluated with the front of the device positioned at 10 mm from a flat phantom.
7. According to KDB447498 D01, testing of other required channels is not required when the reported 1-g SAR for the highest output channel is $\leq 0.8\text{ W/kg}$ (or the reported 10-g SAR for the highest output channel is $\leq 2\text{ W/kg}$), when the transmission band is $\leq 100\text{MHz}$.
8. According to KDB865664 D01, SAR measurement variability must be assessed for each frequency band. When the original highest measured SAR is $\geq 0.8\text{ W/kg}$, repeated that measurement once. Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is $\geq 1.45\text{ W/kg}$ (~10% from the 1-g SAR limit). The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

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1.6 The SAR Measurement System

A block diagram of the SAR measurement System is given in Fig. a. This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY 5 professional system). The model EX3DV4 field probe is used to determine the internal electric fields. The SAR can be obtained from the equation $SAR = \sigma (|E|)^2 / \rho$ where σ and ρ are the conductivity and mass density of the tissue-simulant.

The DASY 5 system for performing compliance tests consists of the following items:

1. A standard high precision 6-axis robot (Staubli RX family) with controller, teach pendant and software. An arm extension is for accommodating the data acquisition electronics (DAE).
2. A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
3. A data acquisition electronics (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.

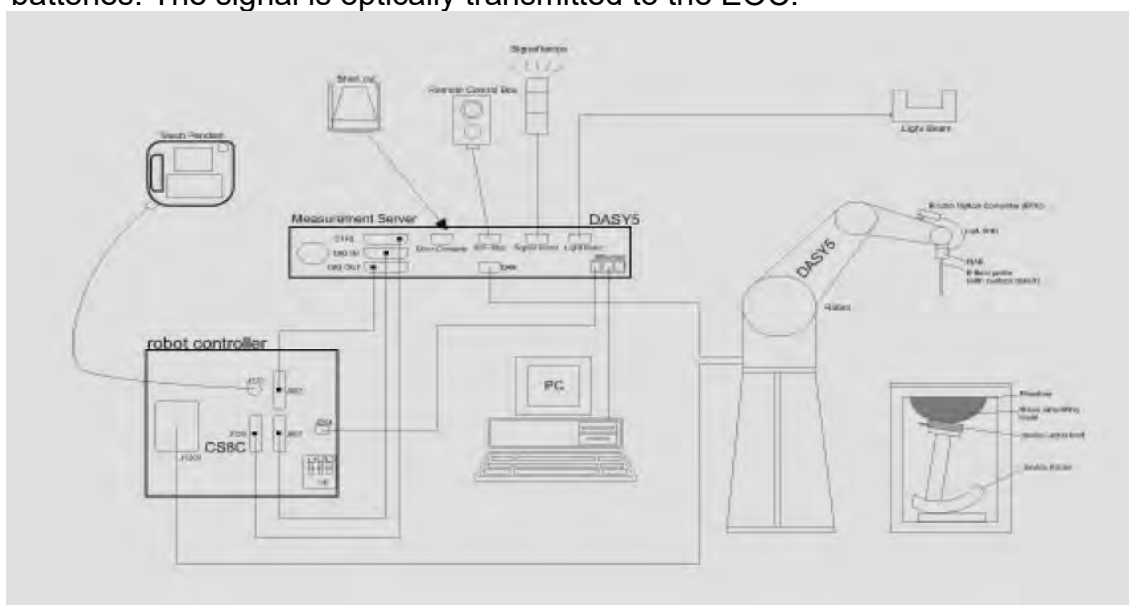


Fig. a The block diagram of SAR system

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4. The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to the DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.
5. The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
6. A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
7. A computer operating Windows 7.
8. DASY 5 software.
9. Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
10. The device holder for handheld mobile phones.
11. Tissue simulating liquid mixed according to the given recipes.
13. Validation dipole kits allowing to validate the proper functioning of the system.

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1.7 System Components

EX3DV4 E-Field Probe

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)		
Calibration	Basic Broad Band Calibration in air Conversion Factors (CF) for HSL 835/1900/2450MHz Additional CF for other liquids and frequencies upon request		
Frequency	10 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 μ W/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)		
Dimensions	Tip diameter: 2.5 mm		
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%.		

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PHANTOM

Model	Twin SAM	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points with the robot.	
Shell Thickness	2 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Height: 850 mm; Length: 1000 mm; Width: 500 mm	

DEVICE HOLDER

Construction	In combination with the Twin SAM Phantom V4.0/V4.0C or Twin SAM, the Mounting Device (made from POM) enables the rotation of the mounted transmitter in spherical coordinates, whereby the rotation point is the ear opening. The devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).	 Device Holder
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1.8 SAR System Verification

The microwave circuit arrangement for system verification is sketched in Fig. b. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. These tests were done at 835/1900/2450 MHz. The tests were conducted on the same days as the measurement of the DUT. The obtained results from the system accuracy verification are displayed in the table 1 (SAR values are normalized to 1W forward power delivered to the dipole). During the tests, the liquid depth above the ear reference points was above 15 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.

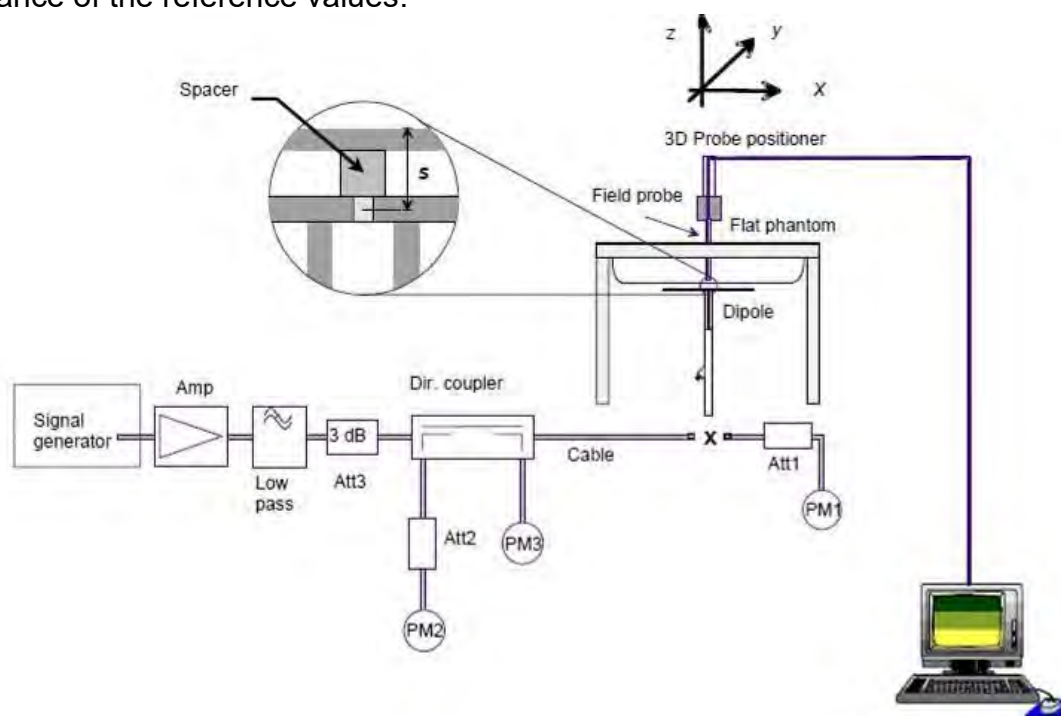


Fig. b The block diagram of system verification

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Validation Kit	S/N	Frequency (MHz)	1W Target 1g-SAR (W/kg)	pin=250mW Measured 1g-SAR (W/kg)	Normalized to 1W 1g-SAR (W/kg)	Deviation (%)	Limit	Measurement Date
D835V2	4d063	835	9.64	2.36	9.44	-2.07	± 10%	May.03,2022
D1900V2	5d018	1900	39.7	9.67	38.68	-2.57	± 10%	May.03,2022
D2450V2	835	2450	52.7	12.8	51.2	-2.85	± 10%	May.04,2022

Validation Kit	S/N	Frequency (MHz)	1W Target 10g-SAR (W/kg)	pin=250mW Measured 10g-SAR (W/kg)	Normalized to 1W 10g-SAR (W/kg)	Deviation (%)	Limit	Measurement Date
D835V2	4d063	835	6.29	1.53	6.12	-2.70	± 10%	May.03,2022
D1900V2	5d018	1900	20.2	4.93	19.72	-2.38	± 10%	May.03,2022
D2450V2	835	2450	23.9	5.81	23.24	-2.76	± 10%	May.04,2022

Table 1. Results of system verification

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1.9 Tissue Simulant Fluid for the Frequency Band

The dielectric properties for this Head-simulant fluid were measured by using the SPEAG Dielectric Assessment Kit (DAKS-3.5)

All dielectric parameters of tissue simulates were measured within 24 hours of SAR measurements. The measured conductivity and permittivity are all within $\pm 5\%$ of the target values.

The depth of the tissue simulant in the flat section of the phantom was $\geq 15 \text{ cm} \pm 5 \text{ mm}$ during all tests. (Fig. 2)

Tissue Type	Measurement Date	Measured Frequency (MHz)	Target Dielectric Constant, ϵ_r	Target Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ_r	Measured Conductivity, σ (S/m)	% dev ϵ_r	% dev σ
Head	May, 03. 2022	826.4	41.545	0.899	41.389	0.903	-0.38%	0.38%
		835	41.500	0.900	41.356	0.906	-0.35%	0.66%
		836.6	41.500	0.902	41.352	0.906	-0.36%	0.51%
		846.6	41.500	0.912	41.316	0.910	-0.44%	-0.30%
		1852.4	40.000	1.400	39.801	1.394	-0.50%	-0.44%
		1880	40.000	1.400	39.801	1.394	-0.50%	-0.40%
		1900	40.000	1.400	39.801	1.395	-0.50%	-0.39%
		1907.6	40.000	1.400	39.801	1.394	-0.50%	-0.40%
	May, 04. 2022	2402	39.285	1.757	39.087	1.757	-0.51%	0.00%
		2440	39.218	1.791	39.019	1.790	-0.51%	-0.08%
		2450	39.200	1.800	39.001	1.798	-0.51%	-0.10%
		2480	39.162	1.827	38.963	1.825	-0.51%	-0.10%

Table 2. Dielectric Parameters of Tissue Simulant Fluid

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The composition of the brain tissue simulating liquid is:

Simulating Liquids for 600MHz-10 GHz, Manufactured by SPEAG:

Broad-band head tissue simulating liquids	SPEAG Product	Frequency range (MHz)	Main Ingredients
	HBBL600-10000V6	600 - 10000	Water, Oil

Table 3. Recipes for tissue simulating liquid

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1.10 Evaluation Procedures

The entire evaluation of the spatial peak values is performed within the Post-processing engine (SEMCAD). The system always gives the maximum values for the 1 g and 10 g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

1. The extraction of the measured data (grid and values) from the Zoom Scan.
2. The calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
3. The generation of a high-resolution mesh within the measured volume
4. The interpolation of all measured values from the measurement grid to the high-resolution grid
5. The extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
6. The calculation of the averaged SAR within masses of 1g and 10g.

The probe is calibrated at the center of the dipole sensors that is located 1 to 2.7mm away from the probe tip. During measurements, the probe stops shortly above the phantom surface, depending on the probe and the surface detecting system. Both distances are included as parameters in the probe configuration file. The software always knows exactly how far away the measured point is from the surface. As the probe cannot directly measure at the surface, the values between the deepest measured point and the surface must be extrapolated. The angle between the probe axis and the surface normal line is less than 30 degree.

In the Area Scan, the gradient of the interpolation function is evaluated to find all the extreme of the SAR distribution. The uncertainty on the locations of the extreme is less than 1/20 of the grid size. Only local maximum within -2 dB of the global maximum are searched and passed for the Cube Scan measurement. In the Cube Scan, the interpolation function is used to extrapolate the Peak SAR from the lowest measurement points to the inner phantom surface (the extrapolation distance). The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5mm.

The maximum search is automatically performed after each area scan measurement. It is based on splines in two or three dimensions. The procedure can find the maximum for most SAR distributions even with relatively large grid spacing. After the area scanning measurement, the probe is automatically moved to a position at the interpolated maximum. The following scan can directly use this position for reference, e.g., for a finer resolution grid or the cube evaluations. The 1g and 10g peak evaluations are only available for the predefined cube 7x7x7 scans. The routines are verified and optimized for the grid dimensions used in these cube measurements.

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The measured volume of 30x30x30mm contains about 30g of tissue. The first procedure is an extrapolation (incl. Boundary correction) to get the points between the lowest measured plane and the surface. The next step uses 3D interpolation to get all points within the measured volume. In the last step, a 1g cube is placed numerically into the volume and its averaged SAR is calculated. This cube is moved around until the highest averaged SAR is found. If the highest SAR is found at the edge of the measured volume, the system will issue a warning: higher SAR values might be found outside of the measured volume. In that case the cube measurement can be repeated, using the new interpolated maximum as the center.

1.11 Probe Calibration Procedures

For the calibration of E-field probes in lossy liquids, an electric field with an accurately known field strength must be produced within the measured liquid. For standardization purposes it would be desirable if all measurements which are necessary to assess the correct field strength would be traceable to standardized measurement procedures. In the following two different calibration techniques are summarized:

1.11.1 Transfer Calibration with Temperature Probes

In lossy liquids the specific absorption rate (SAR) is related both to the electric field (E) and the temperature gradient ($\delta T / \delta t$) in the liquid.

$$SAR = \frac{\sigma}{\rho} |E|^2 = c \frac{\delta T}{\delta t}$$

whereby σ is the conductivity, ρ the density and c the heat capacity of the liquid.

Hence, the electric field in lossy liquid can be measured indirectly by measuring the temperature gradient in the liquid. Non-disturbing temperature probes (optical probes or thermistor probes with resistive lines) with high spatial resolution (<1-2 mm) and fast reaction time (<1 s) are available and can be easily calibrated with high precision [1]. The setup and the exciting source have no influence on the calibration; only the relative positioning uncertainties of the standard temperature probe and the E-field probe to be calibrated must be considered. However, several problems limit the available accuracy of probe calibrations with temperature probes:

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1. The temperature gradient is not directly measurable but must be evaluated from temperature measurements at different time steps. Special precaution is necessary to avoid measurement errors caused by temperature gradients due to energy equalizing effects or convection currents in the liquid. Such effects cannot be completely avoided, as the measured field itself destroys the thermal equilibrium in the liquid. With a careful setup these errors can be kept small.
2. The measured volume around the temperature probe is not well defined. It is difficult to calculate the energy transfer from a surrounding gradient temperature field into the probe. These effects must be considered, since temperature probes are calibrated in liquid with homogeneous temperatures. There is no traceable standard for temperature rise measurements.
3. The calibration depends on the assessment of the specific density, the heat capacity and the conductivity of the medium. While the specific density and heat capacity can be measured accurately with standardized procedures ($\sim 2\%$ for c ; much better for ρ), there is no standard for the measurement of the conductivity. Depending on the method and liquid, the error can well exceed $\pm 5\%$.
4. Temperature rise measurements are not very sensitive and therefore are often performed at a higher power level than the E-field measurements. The nonlinearities in the system (e.g., power measurements, different components, etc.) must be considered.

Considering these problems, the possible accuracy of the calibration of E-field probes with temperature gradient measurements in a carefully designed setup is about $\pm 10\%$ (RSS) [2]. Recently, a setup which is a combination of the waveguide techniques and the thermal measurements was presented in [3]. The estimated uncertainty of the setup is $\pm 5\%$ (RSS) when the same liquid is used for the calibration and for actual measurements and $\pm 7-9\%$ (RSS) when not, which is in good agreement with the estimates given in [2].

1.11.2 Calibration with Analytical Fields

In this method a technical setup is used in which the field can be calculated analytically from measurements of other physical magnitudes (e.g., input power). This corresponds to the standard field method for probe calibration in air; however, there is no standard defined for fields in lossy liquids.

When using calculated fields in lossy liquids for probe calibration, several points must be considered in the assessment of the uncertainty:

1. The setup must enable accurate determination of the incident power.
2. The accuracy of the calculated field strength will depend on the

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assessment of the dielectric parameters of the liquid.

3. Due to the small wavelength in liquids with high permittivity, even small setups might be above the resonant cutoff frequencies. The field distribution in the setup must be carefully checked for conformity with the theoretical field distribution.

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1.12 Test Standards and Limits

According to FCC 47CFR §2.1093(d) The limits to be used for evaluation are based generally on criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate ("SAR") in Section 4.2 of "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE C95.1, By the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017. These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in "Biological Effects and Exposure Criteria for Radio frequency Electromagnetic Fields," NCRP Report No. 86, Section 17.4.5. Copyright NCRP, 1986, Bethesda, Maryland 20814. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards. The criteria to be used are specified in paragraphs (d)(1) and (d)(2) of this section and shall apply for portable devices transmitting in the frequency range from 100 kHz to 6 GHz. Portable devices that transmit at frequencies above 6 GHz are to be evaluated in terms of the MPE limits specified in § 1.1310 of this chapter. Measurements and calculations to demonstrate compliance with MPE field strength or power density limits for devices operating above 6 GHz should be made at a minimum distance of 5 cm from the radiating source.

1. Limits for Occupational/Controlled exposure: 0.4 W/kg as averaged over the whole-body and spatial peak SAR not exceeding 8 W/kg as averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the hands, wrists, feet and ankles where the spatial peak SAR shall not exceed 20 W/kg, as averaged over an 10 grams of tissue (defined as a tissue volume in the shape of a cube).
2. Occupational/Controlled limits apply when persons are exposed as a consequence of their employment provided these persons are fully aware of and exercise control over their exposure. Awareness of exposure can be accomplished by use of warning labels or by specific training or education through appropriate means, such as an RF safety program in a work environment.
3. Limits for General Population/Uncontrolled exposure: 0.08 W/kg as averaged over the whole-body and spatial peak SAR not exceeding 1.6 W/kg as averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the hands, wrists, feet and ankles where the

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spatial peak SAR shall not exceed 4 W/kg, as averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). General Population/Uncontrolled limits apply when the general public may be exposed, or when persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or do not exercise control over their exposure. Warning labels placed on consumer devices such as cellular telephones will not be sufficient reason to allow these devices to be evaluated subject to limits for occupational/controlled exposure in paragraph (d)(1) of this section. (Table 4.)

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

Table 4. RF exposure limits

Notes:

1. Uncontrolled environments are defined as locations where there is potential exposure of individuals who have no knowledge or control of their potential exposure.
2. Controlled environments are defined as locations where there is potential exposure of individuals who have knowledge of their potential exposure and can exercise control over their exposure.

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2. Summary of Results

2.1 Decision rules

Reported measurement data comply with IEEE 1528-2013:

Determining compliance shall be based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.

2.2 Summary of Results

Next to mouth exposure

Band	Position	Distance (mm)	CH	Freq. (MHz)	Max. Rated Avg. Power + Max. Tolerance (dBm)	Measured Avg. Power (dBm)	Scaling	Averaged SAR over 1g (W/kg)		Plot page
								Measured	Reported	
WCDMA Band II	Front Surface	10	9262	1852.4	23.9	22.44	139.96%	0.685	0.959	29
WCDMA Band II	Front Surface	10	9400	1880	23.9	22.33	143.55%	0.637	0.914	-
WCDMA Band II	Front Surface	10	9538	1907.6	23.9	22.18	148.59%	0.587	0.872	-
WCDMA Band V	Front Surface	10	4132	826.4	23.9	23.14	119.12%	0.361	0.430	-
WCDMA Band V	Front Surface	10	4183	836.6	23.9	23.05	121.62%	0.491	0.597	-
WCDMA Band V	Front Surface	10	4233	846.6	23.9	22.92	125.31%	0.636	0.797	30

Mode	Position	Distance (mm)	CH	Freq. (MHz)	Max. Rated Avg. Power + Max. Tolerance (dBm)	Measured Avg. Power (dBm)	Duty cycle scaling	Power scaling	Averaged SAR over 1g (W/kg)		Plot page
									Measured	Reported	
BLE 1M	Front Surface	10	0	2402	-4.08	-4.12	1.297	100.93%	0.0005	0.001	31
BLE 1M	Front Surface	10	19	2440	-4.57	-5.07	1.297	112.20%	0.0003	0.000	-
BLE 1M	Front Surface	10	39	2480	-5.70	-6.20	1.297	112.20%	0.0003	0.000	-

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Extremity exposure

Band	Position	Distance (mm)	CH	Freq. (MHz)	Max. Rated Avg. Power + Max. Tolerance (dBm)	Measured Avg. Power (dBm)	Scaling	Averaged SAR over 10g (W/kg)		Plot page
								Measured	Reported	
WCDMA Band II	Back Surface	0	9262	1852.4	23.9	22.44	139.96%	1.230	1.721	-
WCDMA Band II	Back Surface	0	9400	1880	23.9	22.33	143.55%	1.290	1.852	32
WCDMA Band II	Back Surface	0	9538	1907.6	23.9	22.18	148.59%	1.220	1.813	-
WCDMA Band V	Back Surface	0	4132	826.4	23.9	23.14	119.12%	0.531	0.633	-
WCDMA Band V	Back Surface	0	4183	836.6	23.9	23.05	121.62%	0.719	0.874	-
WCDMA Band V	Back Surface	0	4233	846.6	23.9	22.92	125.31%	0.898	1.125	33

Mode	Position	Distance (mm)	CH	Freq. (MHz)	Max. Rated Avg. Power + Max. Tolerance (dBm)	Measured Avg. Power (dBm)	Duty cycle scaling	Power scaling	Averaged SAR over 10g (W/kg)		Plot page
									Measured	Reported	
BLE 1M	Back Surface	0	0	2402	-4.08	-4.12	1.297	100.93%	0.0005	0.001	34
BLE 1M	Back Surface	0	19	2440	-4.57	-5.07	1.297	112.20%	0.0003	0.000	-
BLE 1M	Back Surface	0	39	2480	-5.70	-6.20	1.297	112.20%	0.0002	0.000	-

Note:

$$\text{Scaling} = \frac{\text{reported SAR}}{\text{measured SAR}} = \frac{P_2(\text{mW})}{P_1(\text{mW})} = 10^{\left(\frac{P_2 - P_1}{10}\right)}(\text{dBm})$$

Reported SAR = measured SAR * (scaling)

Where P2 is maximum specified power, P1 is measured conducted power

2.3 Reporting statements of conformity

The conformity statement in this report is based solely on the test results, measurement uncertainty is excluded.

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3. Instruments List

SAR Test Site: SAR_1					
Manufacturer	Device	Type	Serial number	Date of last calibration	Date of next calibration
SPEAG	Dosimetric E-Field Probe	EX3DV4	3938	Jan/25/2022	Jan/24/2023
SPEAG	System Validation Dipole	D835V2	4d063	Oct/18/2021	Oct/17/2022
SPEAG	System Validation Dipole	D1900V2	5d018	Sep/01/2021	Aug/31/2022
SPEAG	System Validation Dipole	D2450V2	835	Jun/22/2021	Jun/21/2022
SPEAG	Data acquisition Electronics	DAE4	547	Mar/23/2022	Mar/22/2023
SPEAG	Software	DASY 52 V52.10.4	N/A	Calibration not required	Calibration not required
SPEAG	Phantom	SAM	N/A	Calibration not required	Calibration not required
SPEAG	Dielectric Assessment Kit	DAKS-3.5	1053	Feb/28/2022	Feb/27/2023
Anritsu	Radio Communication Test	MT8820C	6201061049	May/14/2021	May/13/2022
Agilent	Dual-directional coupler	778D	MY48220468	Aug/16/2021	Aug/15/2022
Agilent	Dual-directional coupler	772D	MY46151242	Aug/16/2021	Aug/15/2022
Agilent	MXG Analog Signal Generator	N5181A	MY50144143	May/14/2021	May/13/2022
EMCI	Amplifier	ZHL-42	980189	Calibration not required	Calibration not required
EMCI	Amplifier	ZVE-8G	980190	Calibration not required	Calibration not required
Anritsu	Power Meter	ML2496A	1337004	Oct/08/2021	Oct/07/2022
Anritsu	Power Sensor	MA2411B	1306052	Oct/08/2021	Oct/07/2022
R&S	Power Sensor	NRP18S	101973	Jan/22/2022	Jan/21/2023
LKM	Digital thermometer	DTM3000	EC14010603	Nov/09/2021	Nov/08/2022
TECEP	Digital thermometer	DTM-303A	TP130075	Oct/28/2021	Oct/27/2022

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4. Measurements

Date: 2022/5/3

Report No. : E5/2022/20020

WCDMA Band II_Body_Front Surface_CH 9262_10mm

Communication System: WCDMA; Frequency: 1852.4 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 1852.4$ MHz; $\sigma = 1.394$ S/m; $\epsilon_r = 39.801$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Ambient temperature: 22.7°C; Liquid temperature: 22.1°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(7.92, 7.92, 7.92); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (61x81x1): Interpolated grid: dx=15 mm, dy=15 mm

Maximum value of SAR (interpolated) = 0.957 W/kg

Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 20.03 V/m; Power Drift = -0.02 dB

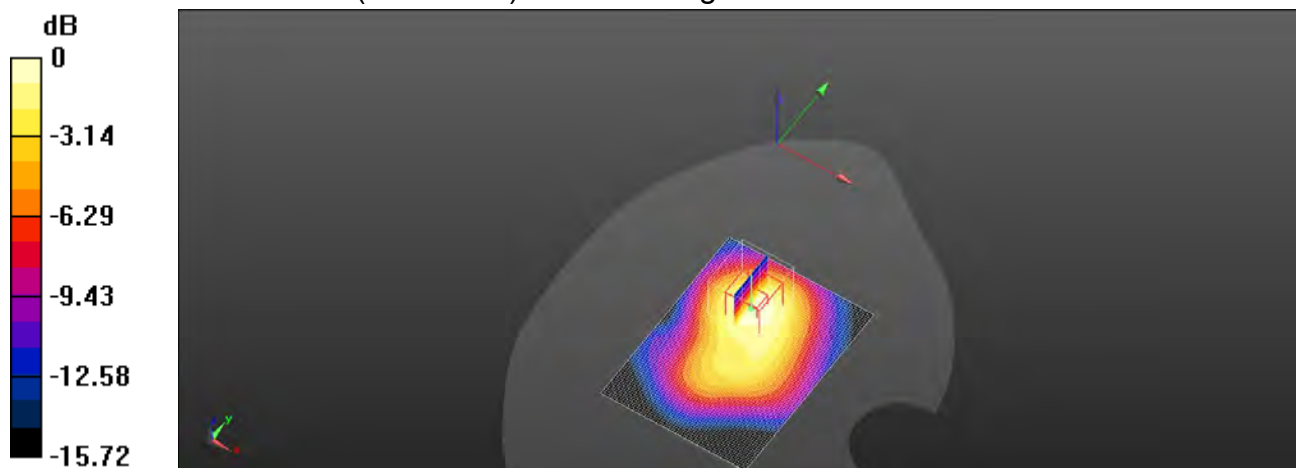
Peak SAR (extrapolated) = 1.16 W/kg

SAR(1 g) = 0.685 W/kg; SAR(10 g) = 0.401 W/kg

Smallest distance from peaks to all points 3 dB below = 16 mm

Ratio of SAR at M2 to SAR at M1 = 58.7%

Maximum value of SAR (measured) = 0.922 W/kg



0 dB = 0.922 W/kg = -0.35 dBW/kg

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Date: 2022/5/3

Report No. : E5/2022/20020
WCDMA Band V_Body_Front Surface_CH 4233_10mm

Communication System: WCDMA; Frequency: 846.6 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 846.6 \text{ MHz}$; $\sigma = 0.91 \text{ S/m}$; $\epsilon_r = 41.316$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Ambient temperature: 23°C; Liquid temperature: 22.4°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(9.29, 9.29, 9.29); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (61x81x1): Interpolated grid: $dx=15 \text{ mm}$, $dy=15 \text{ mm}$

Maximum value of SAR (interpolated) = 0.786 W/kg

Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$

Reference Value = 22.02 V/m; Power Drift = -0.04 dB

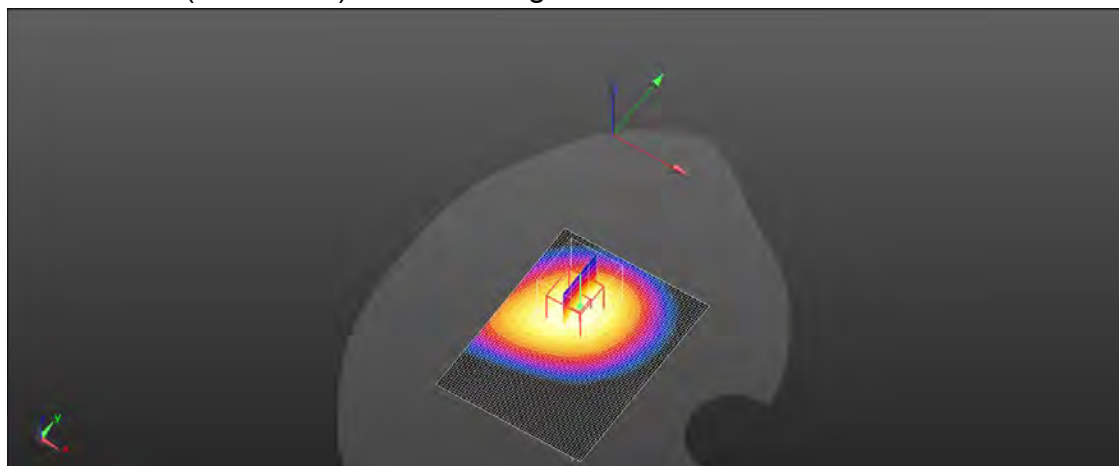
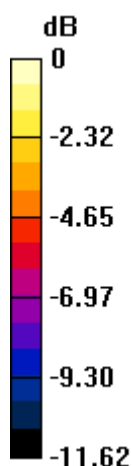
Peak SAR (extrapolated) = 0.919 W/kg

SAR(1 g) = 0.636 W/kg; SAR(10 g) = 0.432 W/kg

Smallest distance from peaks to all points 3 dB below = 20.4 mm

Ratio of SAR at M2 to SAR at M1 = 68.9%

Maximum value of SAR (measured) = 0.789 W/kg



0 dB = 0.789 W/kg = -1.03 dBW/kg

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Date: 2022/5/4

Report No. : E5/2022/20020
BLE_1M_Body_Front Surface_CH 0_10mm

Communication System: BLE; Frequency: 2402 MHz; Duty Cycle: 1:1.297

Medium parameters used: $f = 2402 \text{ MHz}$; $\sigma = 1.757 \text{ S/m}$; $\epsilon_r = 39.087$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Ambient temperature: 22.4°C ; Liquid temperature: 21.8°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(7.39, 7.39, 7.39); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (81x101x1): Interpolated grid: $dx=12 \text{ mm}$, $dy=12 \text{ mm}$

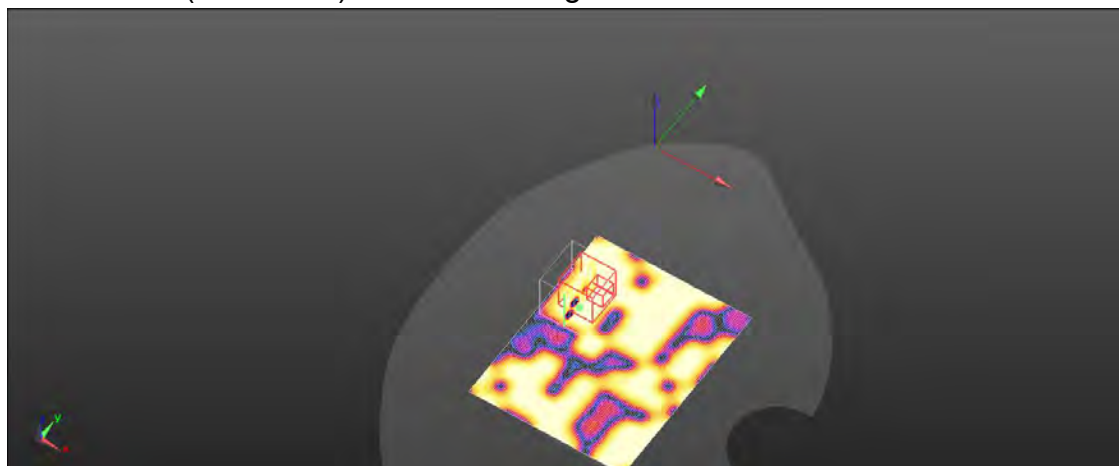
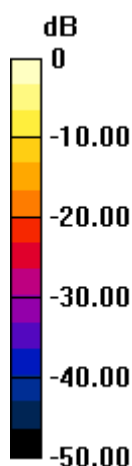
Maximum value of SAR (interpolated) = 0.0136 W/kg
Zoom Scan (7x7x7)/Cube 0: Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$

Reference Value = 0.4722 V/m ; Power Drift = 0.05 dB

Peak SAR (extrapolated) = 0.00218 W/kg
SAR(1 g) = 0.000453 W/kg ; SAR(10 g) = 0.000121 W/kg

Smallest distance from peaks to all points 3 dB below = 6.4 mm

Ratio of SAR at M2 to SAR at M1 = 58.1%

Maximum value of SAR (measured) = 0.00203 W/kg

 $0 \text{ dB} = 0.00203 \text{ W/kg} = -26.93 \text{ dBW/kg}$

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Date: 2022/5/3

Report No. : E5/2022/20020**WCDMA Band II_Product specific 10-g SAR_Back Surface_CH 9400_0mm**

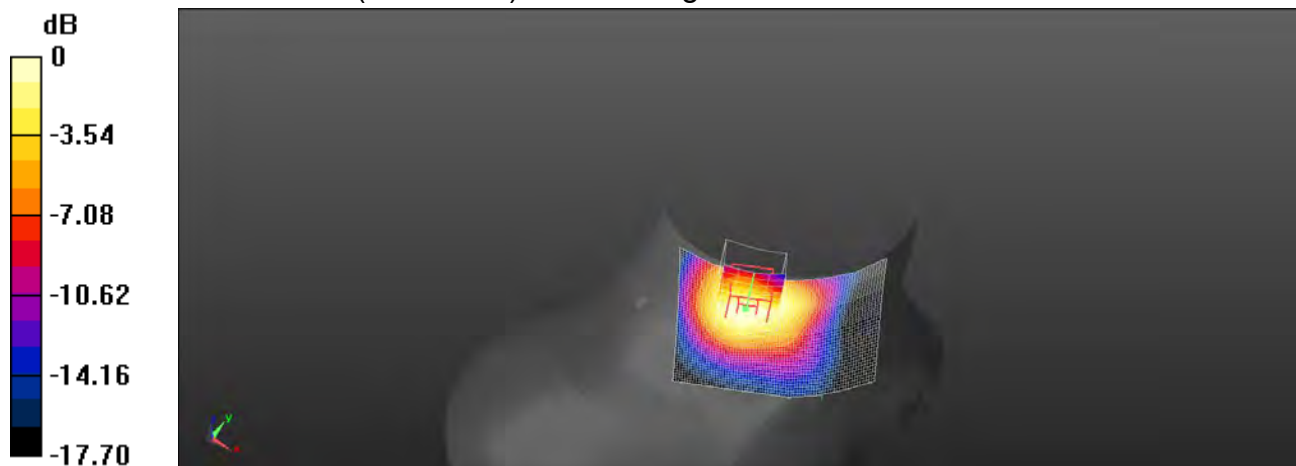
Communication System: WCDMA; Frequency: 1880 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 1880 \text{ MHz}$; $\sigma = 1.394 \text{ S/m}$; $\epsilon_r = 39.801$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Right Section

Ambient temperature: 22.7°C ; Liquid temperature: 22.1°C **DASY5 Configuration:**

- Probe: EX3DV4 - SN3938; ConvF(7.92, 7.92, 7.92); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (51x71x1): Interpolated grid: $dx=15 \text{ mm}$, $dy=15 \text{ mm}$ Maximum value of SAR (interpolated) = 2.33 W/kg **Zoom Scan (5x5x7)/Cube 0:** Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$ Reference Value = 2.089 V/m ; Power Drift = -0.01 dB Peak SAR (extrapolated) = 2.58 W/kg **SAR(1 g) = 1.99 W/kg ; SAR(10 g) = 1.29 W/kg** Smallest distance from peaks to all points 3 dB below = 17.3 mm Ratio of SAR at M2 to SAR at M1 = 80.4% Maximum value of SAR (measured) = 2.33 W/kg  $0 \text{ dB} = 2.33 \text{ W/kg} = 3.67 \text{ dBW/kg}$

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Date: 2022/5/3

Report No. : E5/2022/20020
WCDMA Band V_Product specific 10-g SAR_Back Surface_CH 4233_0mm

Communication System: WCDMA; Frequency: 846.6 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 846.6 \text{ MHz}$; $\sigma = 0.91 \text{ S/m}$; $\epsilon_r = 41.316$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Right Section

Ambient temperature: 23°C; Liquid temperature: 22.4°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(9.29, 9.29, 9.29); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (51x71x1): Interpolated grid: $dx=15 \text{ mm}$, $dy=15 \text{ mm}$

Maximum value of SAR (interpolated) = 1.67 W/kg

Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$

Reference Value = 2.819 V/m; Power Drift = -0.04 dB

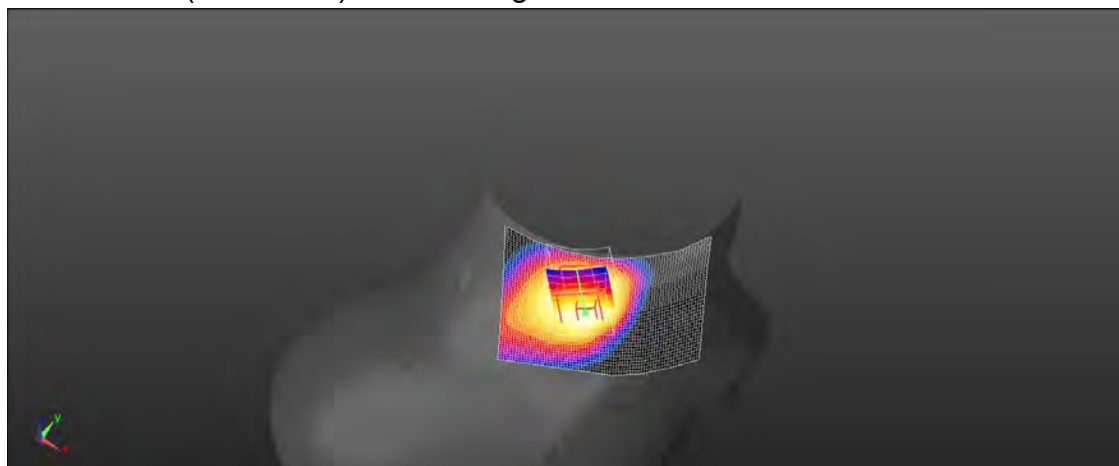
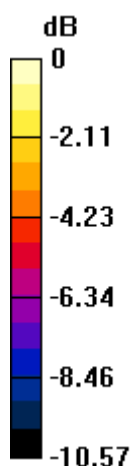
Peak SAR (extrapolated) = 1.78 W/kg

SAR(1 g) = 1.25 W/kg; SAR(10 g) = 0.898 W/kg

Smallest distance from peaks to all points 3 dB below = 10 mm

Ratio of SAR at M2 to SAR at M1 = 78.4%

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



0 dB = 1.44 W/kg = 1.58 dBW/kg

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Date: 2022/5/4

Report No. : E5/2022/20020
BLE_1M_ Product specific 10-g SAR_Back Surface_CH 0_0mm

Communication System: BLE; Frequency: 2402 MHz; Duty Cycle: 1:1.297

Medium parameters used: $f = 2402 \text{ MHz}$; $\sigma = 1.757 \text{ S/m}$; $\epsilon_r = 39.087$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Right Section

Ambient temperature: 22.4°C ; Liquid temperature: 21.8°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(7.39, 7.39, 7.39); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (61x91x1): Interpolated grid: $dx=12 \text{ mm}$, $dy=12 \text{ mm}$

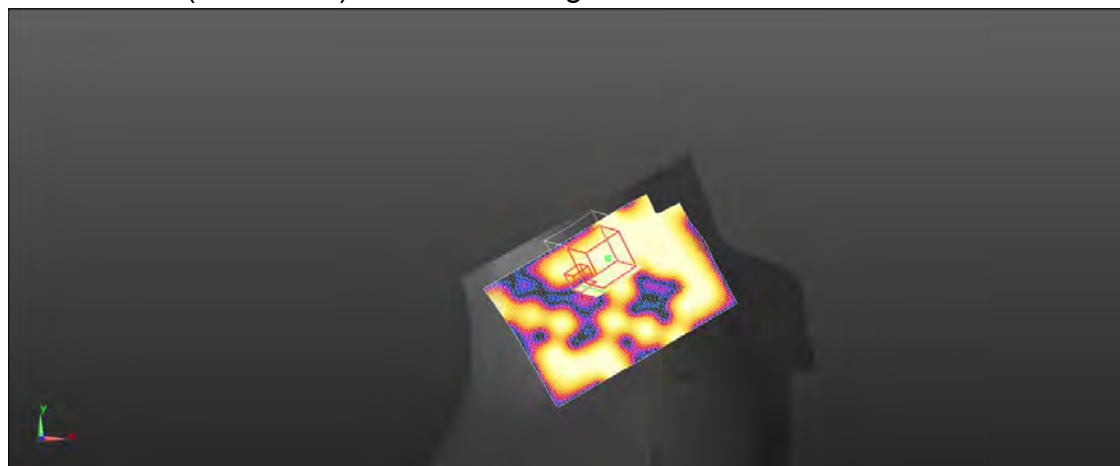
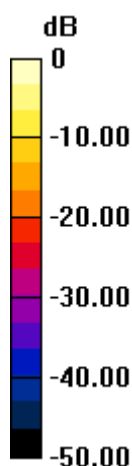
Maximum value of SAR (interpolated) = 0.00483 W/kg
Zoom Scan (7x7x7)/Cube 0: Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$

Reference Value = 0.5430 V/m ; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 0.00320 W/kg
SAR(1 g) = 0.000966 W/kg ; SAR(10 g) = 0.000533 W/kg

Smallest distance from peaks to all points 3 dB below = 7.4 mm

Ratio of SAR at M2 to SAR at M1 = 78.3%

Maximum value of SAR (measured) = 0.00271 W/kg

 $0 \text{ dB} = 0.00271 \text{ W/kg} = -25.67 \text{ dBW/kg}$

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5. SAR System Performance Verification

Date: 2022/5/3

Report No. : E5/2022/20020

Dipole 835 MHz_SN:4d063

Communication System: CW; Frequency: 835 MHz; Duty Cycle: 1:1

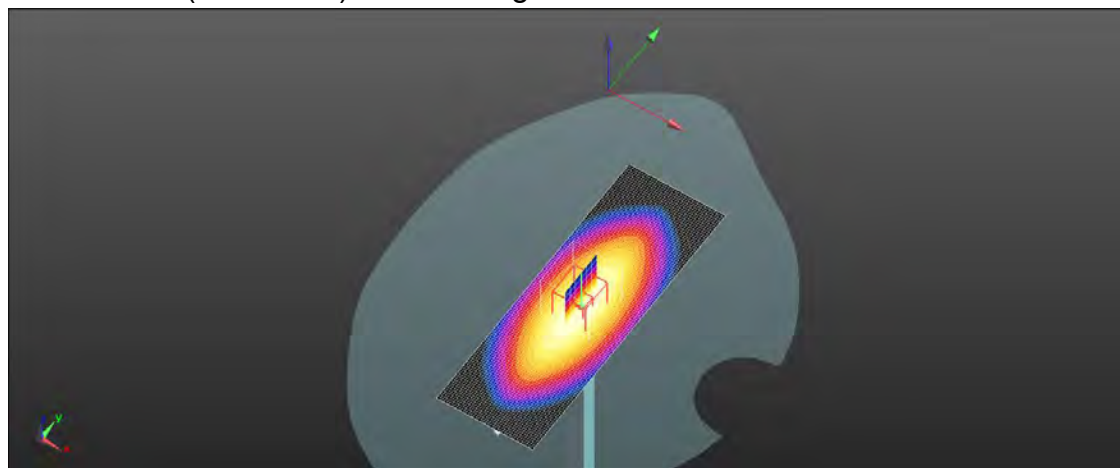
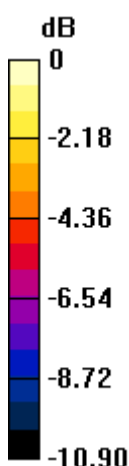
Medium parameters used: $f = 835 \text{ MHz}$; $\sigma = 0.906 \text{ S/m}$; $\epsilon_r = 41.356$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Ambient temperature: 23°C ; Liquid temperature: 22.4°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(9.29, 9.29, 9.29); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (41x121x1): Interpolated grid: $dx=15 \text{ mm}$, $dy=15 \text{ mm}$ Maximum value of SAR (interpolated) = 2.89 W/kg **Zoom Scan (7x7x7)/Cube 0:** Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$ Reference Value = 60.76 V/m ; Power Drift = -0.06 dB Peak SAR (extrapolated) = 3.40 W/kg **SAR(1 g) = 2.36 W/kg ; SAR(10 g) = 1.53 W/kg** Smallest distance from peaks to all points 3 dB below = 15.7 mm Ratio of SAR at M2 to SAR at M1 = 66.8% Maximum value of SAR (measured) = 2.90 W/kg  $0 \text{ dB} = 2.90 \text{ W/kg} = 4.62 \text{ dBW/kg}$

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Date: 2022/5/3

Report No. : E5/2022/20020**Dipole 1900 MHz_SN:5d018**

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1

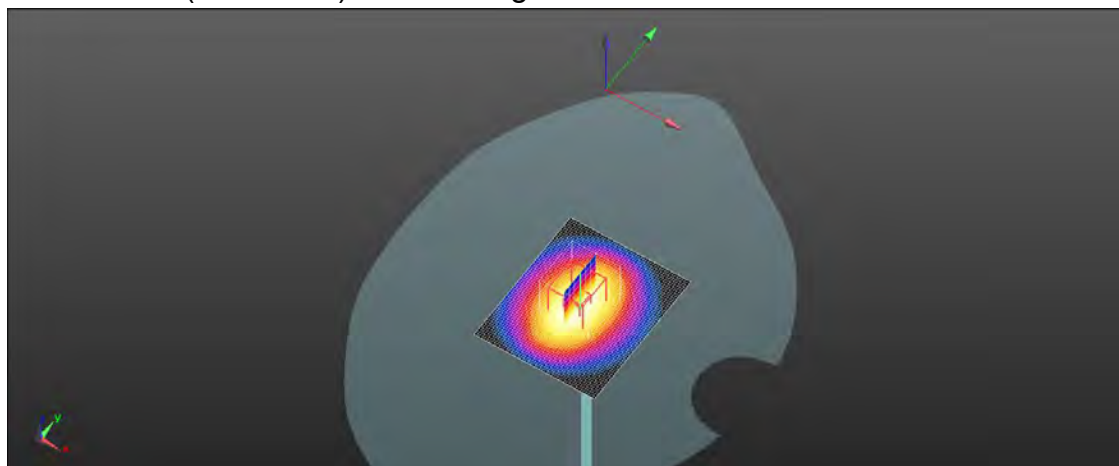
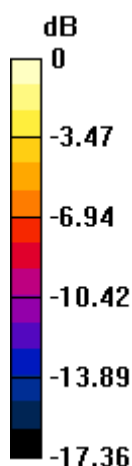
Medium parameters used: $f = 1900 \text{ MHz}$; $\sigma = 1.395 \text{ S/m}$; $\epsilon_r = 39.801$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Ambient temperature: 22.7°C ; Liquid temperature: 22.1°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(7.92, 7.92, 7.92); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (51x61x1): Interpolated grid: $dx=15 \text{ mm}$, $dy=15 \text{ mm}$ Maximum value of SAR (interpolated) = 13.6 W/kg **Zoom Scan (7x7x7)/Cube 0:** Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$ Reference Value = 100.6 V/m ; Power Drift = -0.01 dB Peak SAR (extrapolated) = 16.9 W/kg **SAR(1 g) = 9.67 W/kg ; SAR(10 g) = 4.93 W/kg** Smallest distance from peaks to all points 3 dB below = 13 mm Ratio of SAR at M2 to SAR at M1 = 56.8% Maximum value of SAR (measured) = 13.2 W/kg  $0 \text{ dB} = 13.2 \text{ W/kg} = 11.20 \text{ dBW/kg}$

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Date: 2022/5/4

Report No. : E5/2022/20020**Dipole 2450 MHz_SN:835**

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.798$ S/m; $\epsilon_r = 39.001$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Ambient temperature: 22.4°C; Liquid temperature: 21.8°C

DASY5 Configuration:

- Probe: EX3DV4 - SN3938; ConvF(7.39, 7.39, 7.39); Calibrated: 2022/1/25
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn547; Calibrated: 2022/3/23
- Phantom: SAM
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Area Scan (61x111x1): Interpolated grid: dx=12 mm, dy=12 mm

Maximum value of SAR (interpolated) = 21.4 W/kg

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 108.2 V/m; Power Drift = -0.02 dB

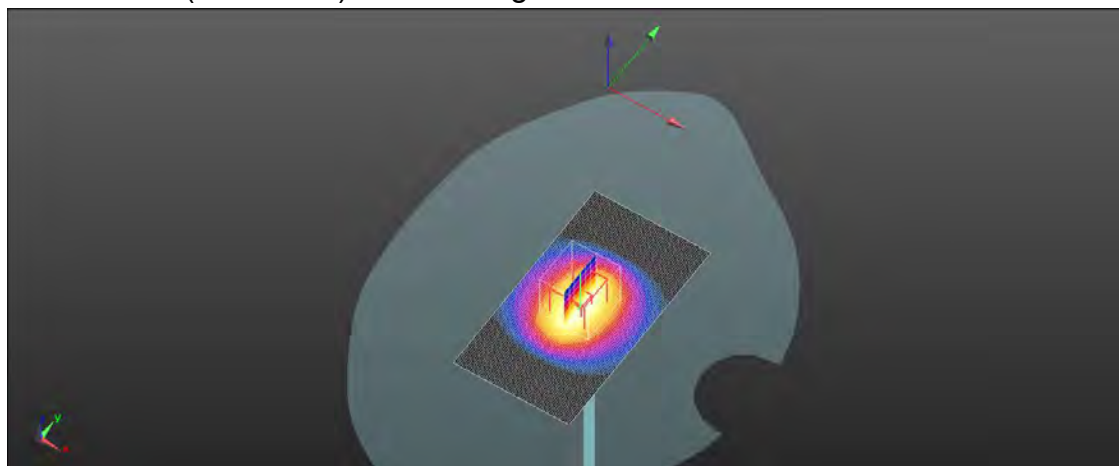
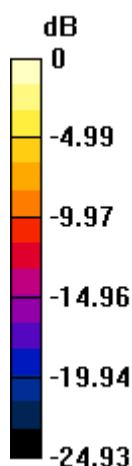
Peak SAR (extrapolated) = 28.6 W/kg

SAR(1 g) = 12.8 W/kg; SAR(10 g) = 5.81 W/kg

Smallest distance from peaks to all points 3 dB below = 9.8 mm

Ratio of SAR at M2 to SAR at M1 = 54.5%

Maximum value of SAR (measured) = 20.4 W/kg



0 dB = 20.4 W/kg = 13.09 dBW/kg

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6. Uncertainty Budget

Measurement Uncertainty evaluation template for DUT SAR test (0.3-3G)

A	c	D	e		f	g	h=c * f / e	i=c * g / e	k
Source of Uncertainty	Tolerance/ Uncertainty	Probabilit y	Div	Div Value	ci (1g)	ci (10g)	Standard uncertainty	Standard uncertainty	vi, or Veff
Measurement system									
Probe calibration	6.00%	N	1	1	1	1	6.00%	6.00%	∞
<i>Isotropy , Axial</i>	3.50%	R	$\sqrt{3}$	1.732	1	1	2.02%	2.02%	∞
<i>Isotropy, Hemispherical</i>	9.60%	R	$\sqrt{3}$	1.732	1	1	5.54%	5.54%	∞
Modulation Response	2.40%	R	$\sqrt{3}$	1.732	1	1	1.40%	1.40%	∞
Boundary Effect	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Linearity	4.70%	R	$\sqrt{3}$	1.732	1	1	2.71%	2.71%	∞
Detection Limits	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Readout Electronics	0.30%	N	1	1	1	1	0.30%	0.30%	∞
Response time	0.80%	R	$\sqrt{3}$	1.732	1	1	0.46%	0.46%	∞
Integration Time	2.60%	R	$\sqrt{3}$	1.732	1	1	1.50%	1.50%	∞
Measurement drift (class A evaluation)	1.75%	R	$\sqrt{3}$	1.732	1	1	1.01%	1.01%	∞
RF ambient condition - noise	3.00%	R	$\sqrt{3}$	1.732	1	1	1.73%	1.73%	∞
RF ambient conditions - reflections	3.00%	R	$\sqrt{3}$	1.732	1	1	1.73%	1.73%	∞
Probe positioner Mechanical restrictions	0.40%	R	$\sqrt{3}$	1.732	1	1	0.23%	0.23%	∞
Probe Positioning with respect to phantom	2.90%	R	$\sqrt{3}$	1.732	1	1	1.67%	1.67%	∞
Post-processing	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Max SAR Eval	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Test Sample related									
Test sample positioning	2.90%	N	1	1	1	1	2.90%	2.90%	M-1
Device Holder Uncertainty	3.60%	N	1	1	1	1	3.60%	3.60%	M-1
Drift of output power	5.00%	R	$\sqrt{3}$	1.732	1	1	2.89%	2.89%	∞
Phantom and Setup									
Phantom Uncertainty	4.00%	R	$\sqrt{3}$	1.732	1	1	2.31%	2.31%	∞
Liquid permittivity (mea.)	0.51%	N	1	1	0.64	0.43	0.33%	0.22%	M
Liquid Conductivity (mea.)	0.66%	N	1	1	0.6	0.49	0.40%	0.32%	M
Combined standard uncertainty		RSS					11.43%	11.41%	

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Appendixes

Refer to separated files for the following appendixes.

E5202220020 SAR_Appendix A Photographs

E5202220020 SAR_Appendix B DAE & Probe Cal. Certificate

E5202220020 SAR_Appendix C Phantom Description & Dipole Cal. Certificate

- End of Report -

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