FCC SAR Test Report

APPLICANT	:	CASTLES TECHNOLOGY CO., LTD.
EQUIPMENT	:	Smart Module
BRAND NAME	:	CASTLES TECHNOLOGY
MODEL NAME	:	CWM100
FCC ID	:	WIYCWM100001
STANDARD	:	FCC 47 CFR Part 2 (2.1093)

The product was tested inside of CASTLES TECHNOLOGY POS Terminal.

We, Sporton International Inc. (Kunshan), would like to declare that the tested sample has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of Sporton International Inc. (Kunshan), the test report shall not be reproduced except in full.

Si Zhang

Approved by: Si Zhang

ilac-MRA ACCREDITED Cert #5145.02

Sporton International Inc. (Kunshan)
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People's Republic of China

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Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA593093-02	Rev. 01	Initial issue of report	Apr. 17, 2026

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **CASTLES TECHNOLOGY CO., LTD., Smart Module, CWM100,** are as follows.

Frequency Band		Highest SAR Summary	
		Body-worn (Separation 10mm)	Extremity (Separation 0mm)
		1g SAR (W/kg)	10g SAR (W/kg)
WCDMA	WCDMA V	0.28	
LTE	LTE Band 7	1.06	1.74
	LTE Band 12/17		1.15
	LTE Band 13	0.56	
	LTE Band 25/2	0.81	1.76
	LTE Band 26/5		0.44
	LTE Band 66/4	0.53	2.57
WLAN	2.4GHz WLAN	0.12	0.30
	5GHz WLAN	0.38	0.54
Date of Testing:		2026/3/19 ~ 2026/4/15	

Remark:

1. This device supports LTE B2 / B4 / B5 / B17 and B25 / B66 / B26 / B12. Since the supported frequency span for LTE B2 / B4 / B5 / B17 falls completely within the support's frequency span for LTE B25 / B66 / B26 / B12, both LTE bands have the same target power, and both LTE bands share the same transmission path; therefore, SAR was only assessed for LTE B25 / B66 / B26 / B12.
2. This is a variant report, the change notes please refer Product Equality Declaration exhibit submitted. According to the difference, only the worst cases from original test report (Sporton Report Number FA593093 and FA593093A) were verified for the differences.

Declaration of Conformity:
The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.
Comments and Explanations:
The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg for Partial-Body 1g SAR, 4.0 W/kg for Product Specific 10g SAR) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

2. Administration Data

Sporton International Inc. (Kunshan) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.02.

Testing Laboratory			
Test Firm	Sporton International Inc. (Kunshan)		
Test Site Location	No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300 People's Republic of China TEL : +86-512-57900158		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR02-KS	CN1257	314309

Applicant	
Company Name	CASTLES TECHNOLOGY CO., LTD.
Address	6F, NO. 207-5, SEC. 3, BEIXIN RD., XINDIAN DISTRICT, NEW TAIPEI CITY 231030, TAIWAN (R.O.C.)

Manufacturer	
Company Name	CASTLES TECHNOLOGY CO., LTD.
Address	6F, NO. 207-5, SEC. 3, BEIXIN RD., XINDIAN DISTRICT, NEW TAIPEI CITY 231030, TAIWAN (R.O.C.)

3. Guidance Applied

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2013
- IEC/IEEE 62209-1528:2020
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 941225 D01 3G SAR Procedures v03r01
- FCC KDB 941225 D05 SAR for LTE Devices v02r05

4. Equipment Under Test (EUT) Information

4.1 General Information

Product Feature & Specification	
Equipment Name	Smart Module
Brand Name	CASTLES TECHNOLOGY
Model Name	CWM100
FCC ID	WIYCWM100001
S/N	148252524752, 148252524730
Wireless Technology and Frequency Range	WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 14: 788 MHz ~ 798 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 26: 814 MHz ~ 849 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 66: 1710 MHz ~ 1780 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5700 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	RMC 12.2Kbps HSDPA HSUPA DC-HSDPA HSPA+(16QAM uplink is supported) LTE: QPSK, 16QAM, 64QAM WLAN 2.4GHz 802.11b/g/n HT20/HT40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac VHT20/VHT40/VHT80 Bluetooth BR/EDR/LE
EUT Stage	Identical Prototype
Remark: 1. This device does not support voice function. 2. This device has no hotspot function. 3. For dual SIM card mobile has two SIM slots and supports dual SIM dual standby. The WWAN radio transmission will be enabled by either one SIM at a time (single active).	

Host Information	
Equipment Name	POS Terminal
Brand Name	CASTLES TECHNOLOGY
Model Name	S1E4 PRO
Wireless Technology and Frequency Range	NFC : 13.56 MHz
Mode	NFC: ASK

4.2 General LTE SAR Test and Reporting Considerations

Summarized necessary items addressed in KDB 941225 D05 v02r05	
FCC ID	WIYCWM100001
Equipment Name	Smart Module
Operating Frequency Range of each LTE transmission band	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 14: 788 MHz ~ 798 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 26: 814 MHz ~ 849 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 66: 1710 MHz ~ 1780 MHz
Channel Bandwidth	LTE Band 2:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 4:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 5:1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 7: 5MHz, 10MHz, 15MHz, 20MHz LTE Band 12:1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 13: 5MHz, 10MHz LTE Band 14: 5MHz, 10MHz LTE Band 17: 5MHz, 10MHz LTE Band 25:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 26:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz LTE Band 38: 5MHz, 10MHz, 15MHz, 20MHz LTE Band 41: 5MHz, 10MHz, 15MHz, 20MHz LTE Band 66:1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz
Uplink Modulations used	QPSK / 16QAM / 64QAM
LTE Voice / Data requirements	Data only
LTE Release Version	R10
CA Support	Not Supported
LTE MPR permanently built-in by design	**Table 6.2.3-1: Maximum Power Reduction (MPR) for Power Class 1, 2 and 3**

Modulation	Channel bandwidth / Transmission bandwidth (N_{RB})						MPR (dB)
	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz	
QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1
16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1
16 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2
64 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2
64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 3
256 QAM	≥ 1						≤ 5

LTE A-MPR	In the base station simulator configuration, Network Setting value is set to NS_01 to disable A-MPR during SAR testing and the LTE SAR tests was transmitting on all TTI frames (Maximum TTI)
Spectrum plots for RB configuration	A properly configured base station simulator was used for the SAR and power measurement; therefore, spectrum plots for each RB allocation and offset configuration are not included in the SAR report.

Transmission (H, M, L) channel numbers and frequencies in each LTE band

LTE Band 2

	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	18607	1850.7	18615	1851.5	18625	1852.5	18650	1855	18675	1857.5	18700	1860
M	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880
H	19193	1909.3	19185	1908.5	19175	1907.5	19150	1905	19125	1902.5	19100	1900

LTE Band 4

	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	19957	1710.7	19965	1711.5	19975	1712.5	20000	1715	20025	1717.5	20050	1720
M	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5
H	20393	1754.3	20385	1753.5	20375	1752.5	20350	1750	20325	1747.5	20300	1745

LTE Band 5

	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	20407	824.7	20415	825.5	20425	826.5	20450	829
M	20525	836.5	20525	836.5	20525	836.5	20525	836.5
H	20643	848.3	20635	847.5	20625	846.5	20600	844

LTE Band 7

	Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	20775	2502.5	20800	2505	20825	2507.5	20850	2510
M	21100	2535	21100	2535	21100	2535	21100	2535
H	21425	2567.5	21400	2565	21375	2562.5	21350	2560

LTE Band 12

	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	23017	699.7	23025	700.5	23035	701.5	23060	704
M	23095	707.5	23095	707.5	23095	707.5	23095	707.5
H	23173	715.3	23165	714.5	23155	713.5	23130	711

LTE Band 13

	Bandwidth 5 MHz		Bandwidth 10 MHz	
	Channel #	Freq.(MHz)	Channel #	Freq.(MHz)
L	23205	779.5	23230	782
M	23230	782		
H	23255	784.5		

LTE Band 14

	Bandwidth 5 MHz		Bandwidth 10 MHz	
	Channel #	Channel #	Channel #	Freq.(MHz)
L	23305	790.5	23330	793
M	23330	793		
H	23355	795.5		

LTE Band 17

	Bandwidth 5 MHz		Bandwidth 10 MHz	
	Channel #	Freq.(MHz)	Channel #	Freq. (MHz)
L	23755	706.5	23780	709
M	23790	710	23790	710
H	23825	713.5	23800	711

LTE Band 25

	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	26047	1850.7	26055	1851.5	26065	1852.5	26090	1855	26115	1857.5	26140	1860
M	26340	1880	26340	1880	26340	1880	26340	1880	26340	1880	26340	1880
H	26683	1914.3	26675	1913.5	26665	1912.5	26640	1910	26615	1907.5	26590	1905

LTE Band 26										
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	26697	814.7	26705	815.5	26715	816.5	26740	819	26765	821.5
M	26865	831.5	26865	831.5	26865	831.5	26865	831.5	26865	831.5
H	27033	848.3	27025	847.5	27015	846.5	26990	844	26965	841.5

LTE Band 38								
	Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	37775	2572.5	37800	2575	37825	2577.5	37850	2580
M	38000	2595	38000	2595	38000	2595	38000	2595
H	38225	2617.5	38200	2615	38175	2612.5	38150	2610

LTE Band 41								
	Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	39675	2498.5	39700	2501	39725	2503.5	39750	2506
LM	40148	2545.8	40160	2547	40173	2548.3	40185	2549.5
M	40620	2593	40620	2593	40620	2593	40620	2593
HM	41093	2640.3	41080	2639	41068	2637.8	41055	2636.5
H	41565	2687.5	41540	2685	41515	2682.5	41490	2680

LTE Band 66												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	131979	1710.7	131987	1711.5	131997	1712.5	132022	1715	132047	1717.5	132072	1720
M	132322	1745	132322	1745	132322	1745	132322	1745	132322	1745	132322	1745
H	132665	1779.3	132657	1778.5	132647	1777.5	132622	1775	132597	1772.5	132572	1770

5. RF Exposure Limits

5.1 Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

5.2 Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

6. Specific Absorption Rate (SAR)

6.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

6.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

$$\mathbf{SAR} = \frac{\mathbf{d}}{\mathbf{dt}}\left(\frac{\mathbf{dW}}{\mathbf{dm}}\right) = \frac{\mathbf{d}}{\mathbf{dt}}\left(\frac{\mathbf{dW}}{\boldsymbol{\rho}\mathbf{dv}}\right)$$

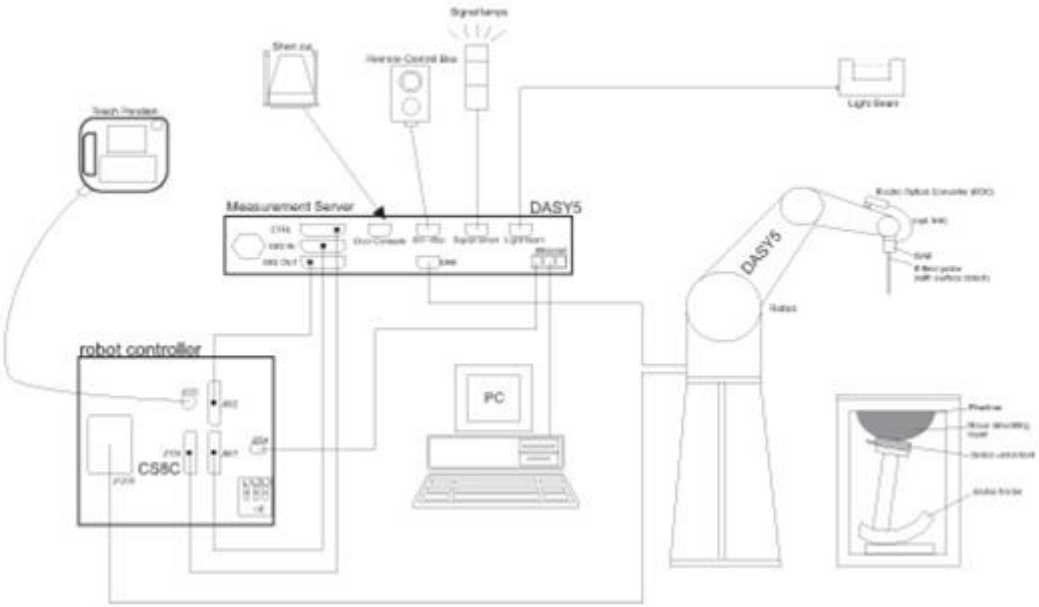
SAR is expressed in units of Watts per kilogram (W/kg)

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

7. System Description and Setup

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- 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.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- 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.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

7.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG).The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

<EX3DV4 Probe>

Construction	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Frequency	4 MHz – 10 GHz Linearity: ±0.2 dB (30 MHz – 10 GHz)
Directivity	±0.3 dB in TSL (rotation around probe axis) ±0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μW/g – >100 mW/g Linearity: ±0.2 dB (noise: typically <1 μW/g)
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 2.5 mm (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm

7.2 Data Acquisition Electronics (DAE)

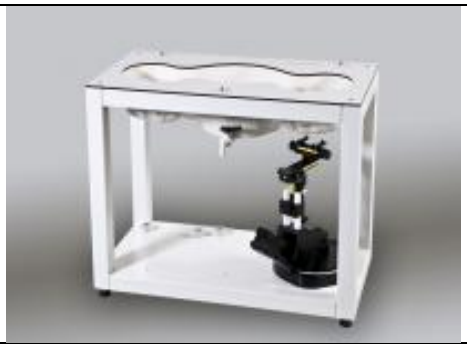
The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.

The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

Photo of DAE

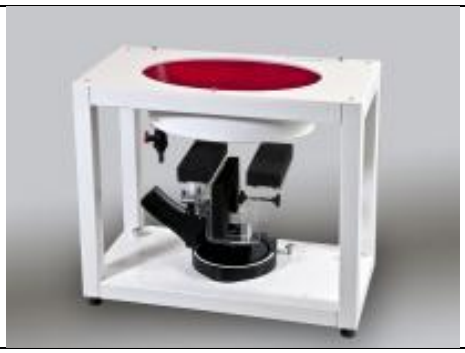
7.3 Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	
Measurement Areas	Left Hand, Right Hand, Flat Phantom	

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. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%)	
Filling Volume	Approx. 30 liters	
Dimensions	Major ellipse axis: 600 mm Minor axis: 400 mm	

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices or for evaluating transmitters operating at low frequencies. ELI is fully compatible with standard and all known tissue simulating liquids.

7.4 Device Holder

<Mounting Device for Hand-Held Transmitter>

In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat). And upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.

Mounting Device for Hand-Held Transmitters

Mounting Device Adaptor for Wide-Phones

<Mounting Device for Laptops and other Body-Worn Transmitters>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.

Mounting Device for Laptops

8. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
(b) Read the WWAN RF power level from the base station simulator.
(c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
(d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

<SAR measurement>

(a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
(b) Place the EUT in the positions as Appendix D demonstrates.
(c) Set scan area, grid size and other setting on the DASY software.
(d) Measure SAR results for the highest power channel on each testing position.
(e) Find out the largest SAR result on these testing positions of each band
(f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

(a) Power reference measurement
(b) Area scan
(c) Zoom scan
(d) Power drift measurement

8.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

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

(a) Extraction of the measured data (grid and values) from the Zoom Scan
(b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
(c) Generation of a high-resolution mesh within the measured volume
(d) Interpolation of all measured values form the measurement grid to the high-resolution grid
(e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
(f) Calculation of the averaged SAR within masses of 1g and 10g

8.2 Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

8.3 Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0 is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

8.4 Zoom Scan

Zoom scans are used assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube shoes base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the zoom scan evaluates the averaged SAR for 1 gram and 10 gram and displays these values next to the job's label.

Zoom scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

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

8.5 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

8.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.

9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	750MHz System Validation Kit	D750V3	1087	2025/3/12	2027/3/10
SPEAG	835MHz System Validation Kit	D835V2	4d167	2025/12/2	2026/12/1
SPEAG	1750MHz System Validation Kit	D1750V2	1090	2025/3/12	2027/3/10
SPEAG	1900MHz System Validation Kit	D1900V2	5d170	2025/6/30	2026/6/29
SPEAG	2450MHz System Validation Kit	D2450V2	1095	2024/2/8	2027/2/5
SPEAG	2600MHz System Validation Kit	D2600V2	1112	2023/12/18	2026/12/15
SPEAG	5000MHz System Validation Kit	D5GHzV2	1113	2025/9/17	2026/9/16
SPEAG	13MHz System Validation Kit	CLA13	1020	2025/6/5	2026/6/4
SPEAG	Data Acquisition Electronics	DAE4	1649	2025/8/27	2026/8/26
SPEAG	Data Acquisition Electronics	DAE4	1691	2025/6/4	2026/6/3
SPEAG	Dosimetric E-Field Probe	EX3DV4	7774	2025/7/25	2026/7/24
SPEAG	Dosimetric E-Field Probe	EX3DV4	7706	2026/2/24	2027/2/23
SPEAG	SAM Twin Phantom	SAM Twin	TP-1842	NCR	NCR
Beichuang	Thermo-Hygrometer	HTC-1	1959633	2025/5/27	2026/5/26
Beichuang	Thermo-Hygrometer	HTC-1	1959630	2025/5/27	2026/5/26
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Radio Communication Analyzer	MT8820C	6201563900	2025/7/2	2026/7/1
Agilent	ENA Series Network Analyzer	E5071C	MY46112129	2025/7/2	2026/7/1
SPEAG	Dielectric Probe Kit	DAK-3.5	1144	2025/8/26	2026/8/25
Anritsu	Vector Signal Generator	MG3710A	6201682672	2025/12/26	2026/12/25
Rohde & Schwarz	Vector Signal Generator	SMBV100A	175779	2025/12/24	2026/12/23
BONN	POWER AMPLIFIER	BLMA 0830-3	087193A	NCR	NCR
BONN	POWER AMPLIFIER	BLMA 2060-2	087193B	NCR	NCR
Agilent	Dual Directional Coupler	778D	20500	2025/7/2	2026/7/1
Agilent	Dual Directional Coupler	11691D	MY48151020	2025/7/2	2026/7/1
Rohde & Schwarz	Power Meter	NRVD	102081	2025/7/2	2026/7/1
Rohde & Schwarz	Power Sensor	NRV-Z5	100538	2025/7/2	2026/7/1
Rohde & Schwarz	Power Sensor	NRV-Z5	100539	2025/7/2	2026/7/1
ARRA	Power Divider	A3200-2	N/A	NCR	NCR
MCL	Attenuation1	BW-S10W5+	N/A	NCR	NCR
MCL	Attenuation2	BW-S10W5+	N/A	NCR	NCR
MCL	Attenuation3	BW-S10W5+	N/A	NCR	NCR
Rohde & Schwarz	Spectrum Analyzer	FSV7	101631	2025/10/11	2026/10/10
TES	DIGITAC THERMOMETER	TYPE-K	200505600	2025/7/5	2026/7/4
BONN Elektronik	Power Amplifier	BSA 0125-150	076577A	2025/12/25	2026/12/24

Note:

1. Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.
2. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

10. System Verification

10.1 Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.1.

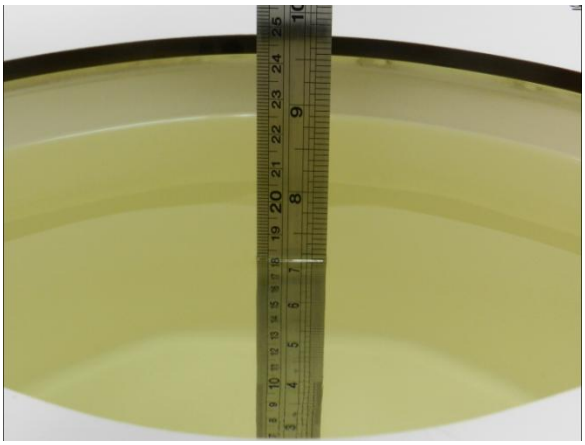


Fig 10.1 Photo of Liquid Height for Body SAR

10.2 Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (εr)
For Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
2600	54.8	0	0	0.1	0	45.1	1.96	39.0

Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Liquid Temp (℃)	Conductivity (σ)	Permittivity (εr)	Conductivity Target (σ)	Permittivity Target (εr)	Delta (σ) (%)	Delta (εr) (%)	Limit (%)	Date
750	22.7	0.886	42.864	0.89	41.9	-0.45	2.3	±5.0	2026/3/19
835	22.8	0.915	42.472	0.9	41.5	1.67	2.34	±5.0	2026/3/19
1750	22.8	1.375	40.648	1.37	40.1	0.36	1.37	±5.0	2026/3/19
1900	22.7	1.443	39.196	1.4	40	3.07	-2.01	±5.0	2026/3/20
2450	22.9	1.771	39.283	1.8	39.2	-1.61	0.21	±5.0	2026/3/20
2600	22.6	1.916	38.796	1.96	39	-2.24	-0.52	±5.0	2026/3/20
5250	22.7	4.646	36.405	4.71	35.95	-1.36	1.27	±5.0	2026/3/21
5600	22.7	5.022	36.038	5.07	35.5	-0.95	1.52	±5.0	2026/3/21
5800	22.6	5.241	35.615	5.27	35.3	-0.55	0.89	±5.0	2026/3/21
13	22.6	0.745	56.2	0.75	55.00	-0.67	2.18	±5	2026/4/15

10.3 System Performance Check Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2026/3/19	750	50	D750V3 - 1087	EX3DV4 - SN7774	DAE4 Sn1649	0.424	8.68	8.48	-2.3	0.281	5.61	5.62	0.18
2026/3/19	835	50	D835V2 - 4d167	EX3DV4 - SN7774	DAE4 Sn1649	0.483	9.36	9.66	3.21	0.311	6.05	6.22	2.81
2026/3/19	1750	50	D1750V2 - 1090	EX3DV4 - SN7774	DAE4 Sn1649	1.89	36.6	37.8	3.28	1	19.5	20	2.56
2026/3/20	1900	50	D1900V2 - 5d170	EX3DV4 - SN7774	DAE4 Sn1649	2.13	39.6	42.6	7.58	1.13	20.9	22.6	8.13
2026/3/20	2450	50	D2450V2 - 1095	EX3DV4 - SN7774	DAE4 Sn1649	2.7	52.6	54	2.66	1.27	24.7	25.4	2.83
2026/3/20	2600	50	D2600V2 - 1112	EX3DV4 - SN7774	DAE4 Sn1649	2.71	55.1	54.2	-1.63	1.23	24.8	24.6	-0.81
2026/3/21	5250	50	D5GHzV2 - 1113	EX3DV4 - SN7774	DAE4 Sn1649	3.94	78.1	78.8	0.9	1.12	22.4	22.4	0
2026/3/21	5600	50	D5GHzV2 - 1113	EX3DV4 - SN7774	DAE4 Sn1649	4.01	80	80.2	0.25	1.12	23	22.4	-2.61
2026/3/21	5800	50	D5GHzV2 - 1113	EX3DV4 - SN7774	DAE4 Sn1649	3.69	77.9	73.8	-5.26	1.04	22.3	20.8	-6.73
2026/4/15	13	1000	CLA13 - SN:1020	EX3DV4 - SN7706	DAE4 Sn1691	0.525	0.548	0.525	-4.55	0.316	0.338	0.316	-7.06

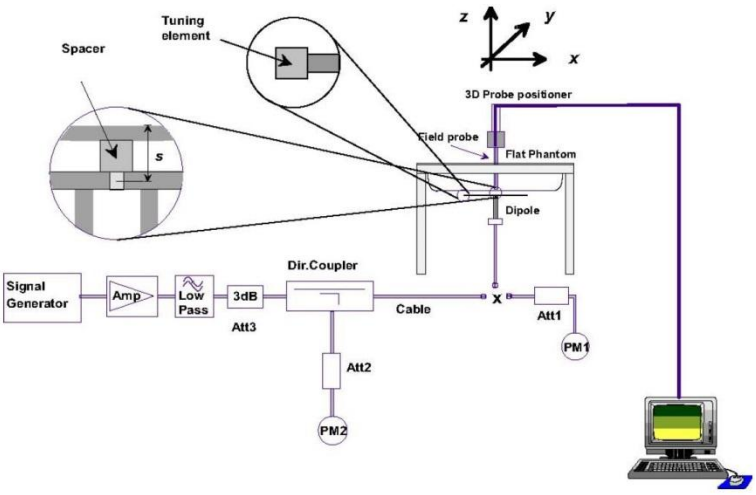


Fig 10.3.1 System Performance Check Setup

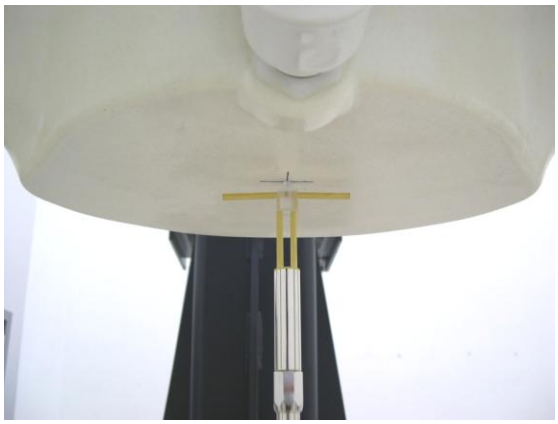


Fig 10.3.2 Setup Photo

Fig 8.3.2 Setup Photo

11. RF Exposure Positions

11.1 Body-worn SAR Testing for Device

(a) To position the device parallel to the phantom surface with Front and Back surfaces of the device.

(b) To adjust the device parallel to the flat phantom.

(c) To adjust the distance between the device surface and the flat phantom to 10 mm.

11.2 Handheld SAR Testing for Device

(b) To position the device parallel to the phantom surface with all surfaces of the device.

(b) To adjust the device parallel to the flat phantom.

(c) To adjust the distance between the device surface and the flat phantom to 0 mm.

Please refer to Appendix D for the test setup photos.

12. SAR Test Results

12.1 Body Worn SAR

【WCDMA SAR】

Plot No	Band	Mode	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
01	WCDMA V	RMC 12.2Kbps	Back	10mm	Ant 0	Full Power	4182	836.4	25.18	25.70	1.127	0.12	0.248	0.279

【LTE SAR】

Plot No	Band	BW	Modulation	RB Size	RB Offset	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
02	LTE Band 7	20M	QPSK	1	0	Back	10mm	Ant 0	Full Power	20850	2510	24.06	25.00	1.242			0.07	0.852	1.058
03	LTE Band 13	10M	QPSK	1	0	Back	10mm	Ant 0	Full Power	23230	782	24.77	25.70	1.239			-0.05	0.448	0.555
04	LTE Band 25	20M	QPSK	1	0	Back	10mm	Ant 0	Full Power	26590	1905	23.66	25.00	1.361			0.05	0.596	0.811
05	LTE Band 66	20M	QPSK	1	0	Back	10mm	Ant 0	Full Power	132322	1745	23.35	24.00	1.161			0.07	0.455	0.528

【WLAN 2.4GHz_5GHz SAR】

Plot No	Band	Mode	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
06	WLAN2.4GHz	802.11b 1Mbps	Back	10mm	Ant 1	Full Power	6	2437	16.70	17.50	1.202	98.94	1.011	0.05	0.099	0.12
07	WLAN5GHz	802.11a 6Mbps	Back	10mm	Ant 1	Full Power	60	5300	14.71	15.50	1.199	98.25	1.018	0.08	0.239	0.292
08	WLAN5GHz	802.11a 6Mbps	Back	10mm	Ant 1	Full Power	100	5500	13.87	15.00	1.297	98.25	1.018	0.02	0.288	0.38
09	WLAN5GHz	802.11a 6Mbps	Back	10mm	Ant 1	Full Power	157	5785	13.91	15.00	1.285	98.25	1.018	0.01	0.242	0.317

12.2 Extremity SAR

【LTE SAR】

Plot No	Band	BW	Modulation	RB Size	RB Offset	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 10g SAR (W/kg)	Reported 10g SAR (W/kg)
10	LTE Band 7	20M	QPSK	1	0	Back	0mm	Ant 0	Full Power	20850	2510	24.06	25.00	1.242			-0.03	1.4	1.739
11	LTE Band 12	10M	QPSK	1	0	Back	0mm	Ant 0	Full Power	23095	707.5	24.59	25.70	1.291			-0.04	0.892	1.152
12	LTE Band 25	20M	QPSK	1	0	Right Side	0mm	Ant 0	Full Power	26340	1880	23.89	25.00	1.291			0.07	1.36	1.756
13	LTE Band 26	15M	QPSK	1	0	Front	0mm	Ant 0	Full Power	26865	831.5	25.43	25.70	1.064			-0.09	0.416	0.443
14	LTE Band 66	20M	QPSK	1	0	Back	0mm	Ant 0	Full Power	132572	1770	22.83	24.00	1.309			0.08	1.96	2.566

【WLAN 2.4GHz_5GHz SAR】

Plot No	Band	Mode	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 10g SAR (W/kg)	Reported 10g SAR (W/kg)
15	WLAN2.4GHz	802.11b 1Mbps	Back	0mm	Ant 1	Full Power	6	2437	16.70	17.50	1.202	98.94	1.011	0.19	0.249	0.303
16	WLAN5GHz	802.11a 6Mbps	Back	0mm	Ant 1	Full Power	60	5300	14.71	15.50	1.199	98.25	1.018	0.06	0.351	0.428
17	WLAN5GHz	802.11a 6Mbps	Back	0mm	Ant 1	Full Power	100	5500	13.87	15.00	1.297	98.25	1.018	0.05	0.408	0.539
18	WLAN5GHz	802.11a 6Mbps	Back	0mm	Ant 1	Full Power	157	5785	13.91	15.00	1.285	98.25	1.018	0.02	0.255	0.334

<NFC SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Freq. (MHz)	Power Drift (dB)	Measured 10g SAR (W/kg)
19	NFC	ASK	Front	0mm	13.56	0.06	**0.054**

12.3 Repeated SAR Measurement

【Repeat SAR 1g - FCC】

No.	Band	Mode	Test Position	Gap (mm)	Antenna	Power State	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)	Ratio
1st	LTE Band 7	20M_QPSK_1_0	Back	10.0	Ant 0	Full Power	20850	2510	24.06	25.00	1.242			0.07	0.852	1.058	-
2nd	LTE Band 7	20M_QPSK_1_0	Back	10.0	Ant 0	Full Power	20850	2510	24.06	25.00	1.242			0.11	0.844	1.048	1.01

General Note:

1. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.
2. Per KDB 865664 D01v01r04, if the ratio among the repeated measurement is ≤ 1.2 and the measured SAR <1.45W/kg, only one repeated measurement is required.
3. Per KDB 865664 D01v01r04, if the extremity repeated SAR is necessary, 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.
4. The ratio is the difference in percentage between original and repeated *measured SAR*.
5. All measurement SAR result is scaled-up to account for tune-up tolerance and is compliant.

13. Simultaneous Transmission Analysis

No.	Simultaneous Transmission Configurations	POS Terminal	
		Body-worn	Extremity
1.	WWAN + WLAN2.4GHz	Yes	Yes
2.	WWAN + WLAN5GHz	Yes	Yes
3.	WWAN + Bluetooth	Yes	Yes
4.	WWAN + WLAN2.4GHz + NFC		Yes
5.	WWAN + WLAN5GHz+ NFC		Yes
6.	WWAN + Bluetooth+ NFC		Yes

General Note:

1. EUT will choose each WCDMA and LTE according to the network signal condition; therefore, they will not operate simultaneously at any moment.
2. EUT will choose either WLAN 2.4GHz or WLAN 5GHz according to the network signal condition; therefore, 2.4GHz WLAN and 5GHz WLAN will not operate simultaneously at any moment though they have independent antenna.
3. WLAN 2.4GHz and Bluetooth share the same antenna and they can't transmit simultaneously.
4. NFC can transmit simultaneously with other Radios in extremity exposure condition.
5. All licensed modes share the same antenna part and cannot transmit simultaneously.
6. The reported SAR summation is calculated based on the same configuration and test position
7. For standalone WWAN at Extremity Exposure Conditions, always choose the highest SAR among all WWAN bands for each exposure position to perform simultaneous transmission analysis with WLAN/BT. This is the worst co-located analysis and can represent each band.
8. Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
   i) 1g Scalar SAR summation < 1.6W/kg and 10g Scalar SAR summation < 4.0W/kg.
   ii) SPLSR = (SAR1 + SAR2)^1.5 / (min. separation distance, mm), and the peak separation distance is determined from the square root of [(x1-x2)2 + (y1-y2)2 + (z1-z2)2], where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.
   iii) If SPLSR ≤ 0.04 for 1g SAR and SPLSR≤ 0.10 for 10g SAR, simultaneously transmission SAR measurement is not necessary.
   iv) Simultaneously transmission SAR measurement, and the reported multi-band 1g SAR < 1.6W/kg and 10g SAR < 4.0W/kg.

Conclusion:

For simultaneously transmission SAR analysis, the maximum SAR from sections 12.1 to 12.2 are all lower than those in the original report (Sporton Report Number FA593093 and FA593093A). Therefore, the standalone reported SAR in the original filing was used to determine simultaneous transmission compliance as it is more conservative. Please see the original filing for complete evaluation of simultaneous transmission analysis.

Test Engineer： Martin Li, Varus Wang, Light Wang

14. Uncertainty Assessment

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be ≤ 30%, for a confidence interval of k = 2. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. For this device, the highest measured 1-g SAR is less 1.5W/kg and highest measured 10-g SAR is less 3.75W/kg. Therefore, the measurement uncertainty table is not required in this report.

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type An evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor[(a)]	1/k[(b)]	$1/\sqrt{3}$	$1/\sqrt{6}$	$1/\sqrt{2}$

(a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity

(b) κ is the coverage factor

Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.

Uncertainty Budget According to IEC/IEEE 62209-1528 (Frequency band: 4 MHz - 10 GHz range)							
Error Description	Uncert. Value (±%)	Prob. Dist.	Div.	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)
Measurement System errors							
Probe calibration	18.6	N	2	1	1	9.3	9.3
Probe calibration drift	1.7	R	1.732	1	1	1.0	1.0
Probe linearity and detection Limit	4.7	R	1.732	1	1	2.7	2.7
Broadband signal	2.8	R	1.732	1	1	1.6	1.6
Probe isotropy	7.6	R	1.732	1	1	4.4	4.4
Other probe and data acquisition errors	2.4	N	1	1	1	2.4	2.4
RF ambient and noise	1.8	N	1	1	1	1.8	1.8
Probe positioning errors	0.006	N	1	0.5	0.5	0.0	0.0
Data processing errors	4.0	N	1	1	1	4.0	4.0
Phantom and Device Errors							
Measurement of phantom conductivity (σ)	2.5	N	1	0.78	0.71	2.0	1.8
Temperature effects (medium)	5.4	R	1.732	0.78	0.71	2.4	2.2
Shell permittivity	14.0	R	1.732	0.5	0.5	4.0	4.0
Distance between the radiating element of the DUT and the phantom medium	2.0	N	1	2	2	4.0	4.0
Repeatability of positioning the DUT or source against the phantom	1.0	N	1	1	1	1.0	1.0
Device holder effects	3.6	N	1	1	1	3.6	3.6
Effect of operating mode on probe sensitivity	2.4	R	1.732	1	1	1.4	1.4
Time-average SAR	1.7	R	1.732	1	1	1.0	1.0
Variation in SAR due to drift in output of DUT	2.5	N	1	1	1	2.5	2.5
Validation antenna uncertainty (validation measurement only)	0.0	N	1	1	1	0.0	0.0
Uncertainty in accepted power (validation measurement only)	0.0	N	1	1	1	0.0	0.0
Correction to the SAR results							
Phantom deviation from target (ε´,σ)	1.9	N	1	1	0.84	1.9	1.6
SAR scaling	0.0	R	1.732	1	1	0.0	0.0
Combined Std. Uncertainty						**14.5%**	**14.4%**
Coverage Factor for 95 %						**K=2**	**K=2**
Expanded STD Uncertainty						**29.0%**	**28.8%**

15. References

[1] FCC 47 CFR Part 2 “Frequency Allocations and Radio Treaty Matters; General Rules and Regulations”

[2] ANSI/IEEE Std. C95.1-1992, “IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz”, September 1992

[3] IEEE Std. 1528-2013, “IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques”, Sep 2013

[4] SPEAG DASY System Handbook

[5] FCC KDB 248227 D01 v02r02, “SAR Guidance for IEEE 802.11 (WiFi) Transmitters”, Oct 2015.

[6] FCC KDB 447498 D01 v06, “Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies”, Oct 2015

[7] FCC KDB 941225 D01 v03r01, “3G SAR MEAUREMENT PROCEDURES”, Oct 2015

[8] FCC KDB 941225 D05 v02r05, “SAR Evaluation Considerations for LTE Devices”, Dec 2015

[9] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.

[10] FCC KDB 865664 D02 v01r02, “RF Exposure Compliance Reporting and Documentation Considerations” Oct 2015.

[11] IEC/IEEE 62209-1528:2020, “Measurement procedure for the assessment of specific absorption rate of human exposure to radio 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)”

Appendixes

Please refer to separated files for the following appendixes

Appendix A. Plots of System Performance Check

Appendix B. Plots of High SAR Measurement

Appendix C. DASY Calibration Certificate

Appendix D. Test Setup Photos

------THE END------