# FCC SAR TEST REPORT

| | | |
|---|---|---|
| APPLICANT | : | CASTLES TECHNOLOGY CO., LTD. |
| EQUIPMENT | : | POS Terminal |
| BRAND NAME | : | CASTLES TECHNOLOGY |
| MODEL NAME | : | S1E4 PRO |
| FCC ID | : | WIYS1E4PRO001 |
| STANDARD | : | FCC 47 CFR Part 2 (2.1093) |

**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

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# History of this test report

| Report No. | Version | Description | Issued Date |
|---|---|---|---|
| FA593093A | Rev. 01 | Initial issue of report | Nov. 10, 2025 |
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# 1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **CASTLES TECHNOLOGY CO., LTD. , POS Terminal, S1E4 PRO,** are as follows.

| Highest Standalone 10g SAR Summary | | | | |
|---|---|---|---|---|
| Equipment Class | Frequency Band | | Extremity (Separation 0mm) 10g SAR (W/kg) | Highest Simultaneous Transmission 10g SAR (W/kg) |
| DXX | NFC | 13.56MHz | <0.10 | 3.28 |
| Date of Testing: | | 2025/10/28 | | |

| 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 (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<br>Jiangsu Province 215300 People's Republic of China<br>TEL : +86-512-57900158 | | |
| Test Site No. | Sporton Site No. | FCC Designation No. | FCC Test Firm Registration No. |
| | SAR07-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

# 4. Equipment Under Test (EUT) Information

## 4.1 General Information

| Product Feature & Specification | |
|---|---|
| Equipment Name | POS Terminal |
| Brand Name | CASTLES TECHNOLOGY |
| Model Name | S1E4 PRO |
| FCC ID | WIYS1E4PRO001 |
| S/N | 148252524752 |
| Integrated WWAN / WLAN/BT Module | Applicant：CASTLES TECHNOLOGY CO., LTD.<br>FCC ID: WIYCWM100001<br>Brand Name: CASTLES TECHNOLOGY<br>Model Name: CWM100 |
| Wireless Technology and Frequency Range | NFC: 13.56 MHz |
| Mode | NFC: ASK |
| EUT Stage | Identical Prototype |

# 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:

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

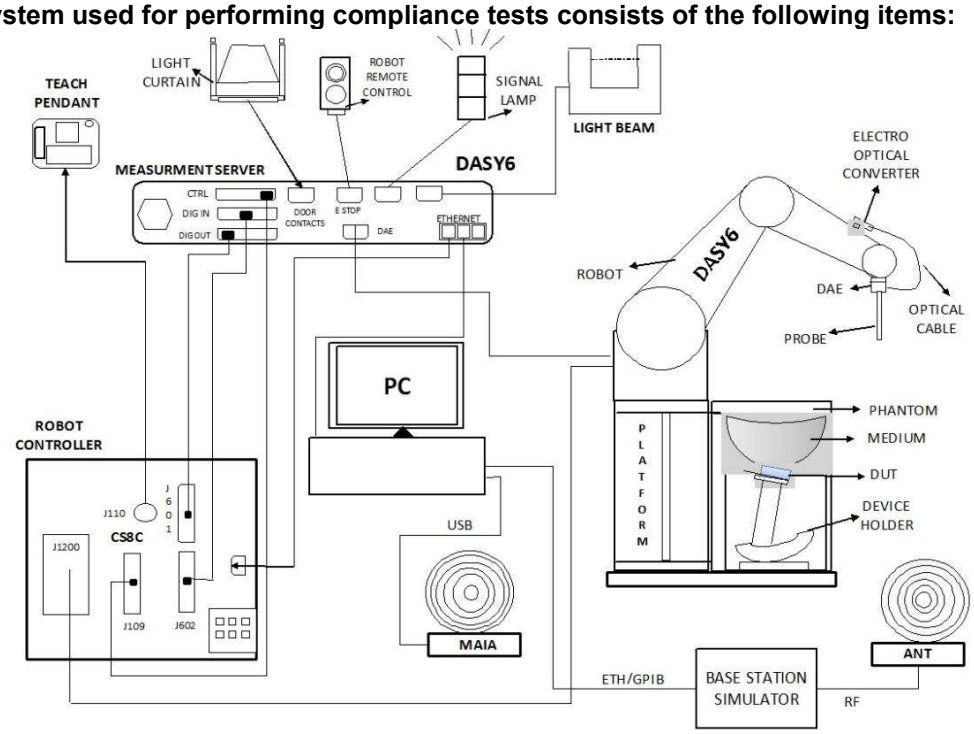
SAR is expressed in units of Watts per kilogram (W/kg)

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

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 Windows 10 and the DASY6 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<br>Built-in shielding against static charges<br>PEEK enclosure material (resistant to organic solvents, e.g., DGBE) |
| **Frequency** | 4 MHz – 10 GHz<br>Linearity: ±0.2 dB (30 MHz – 10 GHz) |
| **Directivity** | ±0.3 dB in TSL (rotation around probe axis)<br>±0.5 dB in TSL (rotation normal to probe axis) |
| **Dynamic Range** | 10 μW/g – >100 mW/g<br>Linearity: ±0.2 dB (noise: typically <1 μW/g) |
| **Dimensions** | Overall length: 337 mm (tip: 20 mm)<br>Tip diameter: 2.5 mm (body: 12 mm)<br>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.

**Fig 5.1 Photo of DAE**

## 7.3 Phantom

**<SAM Twin Phantom>**

| | | |
|---|---|---|
| **Shell Thickness** | 2 ± 0.2 mm;<br>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<br>Minor axis: 400 mm | |

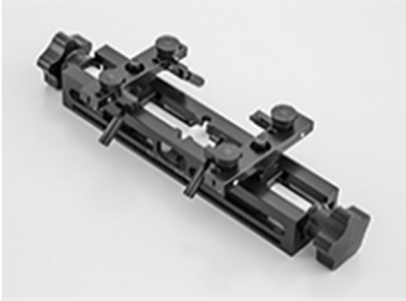
The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices or for evaluating transmitters operating at low frequencies. ELI is fully compatible with standard and all known tissue simulating liquids.

## 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:

<SAR measurement>

(a) Use engineering software to configure EUT NFC 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: $\Delta x_{Area}$, $\Delta y_{Area}$ | ≤ 2 GHz: ≤ 15 mm<br>2 – 3 GHz: ≤ 12 mm | 3 – 4 GHz: ≤ 12 mm<br>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: $\Delta x_{Zoom}$, $\Delta y_{Zoom}$ | | | ≤ 2 GHz: ≤ 8 mm<br>2 – 3 GHz: ≤ 5 mm* | 3 – 4 GHz: ≤ 5 mm*<br>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<br>4 – 5 GHz: ≤ 3 mm<br>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<br>4 – 5 GHz: ≤ 2.5 mm<br>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<br>4 – 5 GHz: ≥ 25 mm<br>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 | Calibration | |
|---|---|---|---|---|---|
| | | | | Last Cal. | Due Date |
| SPEAG | 13MHz System Validation Kit | CLA13 | 1020 | 2025/6/5 | 2026/6/4 |
| SPEAG | Data Acquisition Electronics | DAE4 | 1358 | 2025/7/15 | 2026/7/14 |
| SPEAG | Dosimetric E-Field Probe | EX3DV4 | 7706 | 2025/5/22 | 2026/5/21 |
| SPEAG | ELI Phantom | ELI V8.0 | TP-2135 | NCR | NCR |
| Beichuang | Thermo-Hygrometer | HTC-1 | 1959630 | 2025/5/27 | 2026/5/26 |
| SPEAG | Phone Positioner | N/A | N/A | NCR | NCR |
| Rohde & Schwarz | Vector Signal Generator | SMBV100A | 258305 | 2025/1/2 | 2026/1/1 |
| Agilent | ENA Series Network Analyzer | E5071C | MY46112129 | 2025/7/2 | 2026/7/1 |
| SPEAG | Dielectric Probe Kit | DAK-12 | 1173 | 2024/11/19 | 2025/11/18 |
| 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 | Spectrum Analyzer | FSV7 | 101631 | 2025/10/11 | 2026/10/10 |
| TES | DIGITAC THERMOMETER | TYPE-K | 220305411 | 2025/1/2 | 2026/1/1 |
| BONN Elektronik | Power Amplifier | BSA 0125-150 | 076577A | 2025/1/6 | 2026/1/5 |
| MCL | Attenuation1 | BW-S10W5+ | N/A | Note 1 | |
| MCL | Attenuation2 | BW-S10W5+ | N/A | Note 1 | |
| MCL | Attenuation3 | BW-S10W5+ | N/A | Note 1 | |

**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. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval.
3. The justification data of dipole can be found in appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

# 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. 11.1.

**Fig 11.1 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.

**<Tissue Dielectric Parameter Check Results>**

| Frequency (MHz) | Tissue Type | Liquid Temp. (℃) | Conductivity (σ) | Permittivity ($\varepsilon_r$) | Conductivity Target (σ) | Permittivity Target ($\varepsilon_r$) | Delta (σ) (%) | Delta ($\varepsilon_r$) (%) | Limit (%) | Date |
|---|---|---|---|---|---|---|---|---|---|---|
| 13 | Head | 22.6 | 0.745 | 56.2 | 0.75 | 55.00 | -0.67 | 2.18 | ±5 | 2025/10/28 |

## 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) | Tissue Type | 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 (%) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2025/10/28 | 13 | Head | 1000 | 1020 | 7706 | 1358 | 0.525 | 0.548 | 0.525 | -4.55 | 0.316 | 0.338 | 0.316 | -7.06 |

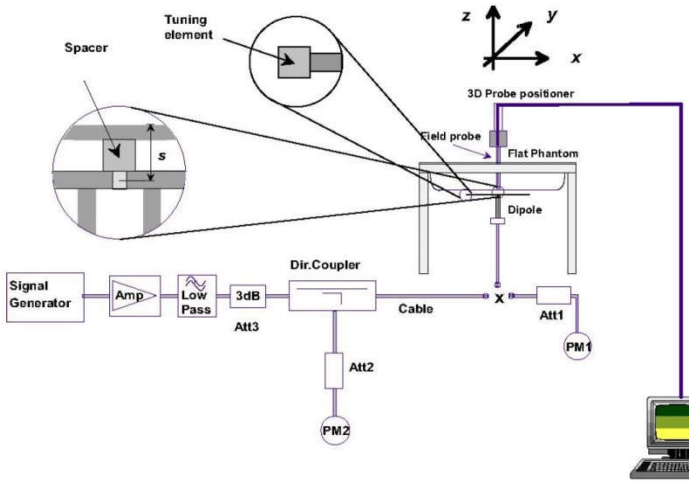



Fig 8.3.1 System Performance Check Setup

Fig 8.3.2 Setup Photo

# 11. RF Exposure Positions

## 11.1 Extremity SAR Exposure

(a) 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 0mm.

**<EUT Setup Photos>**

Please refer to Appendix D for the test setup photos.

# 12. Antenna Location

The detailed antenna location information can refer to SAR Test Setup Photos.

# 13. SAR Test Results

**General Note:**

1. Per KDB 447498 D01, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
   - ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
   - ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
   - ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
2. NFC mainly operate in hand-held extremity exposure conditions, therefore Standalone 10-g extremity SAR testing for NFC will be performed with active mode and max power mode by test software with 100% duty cycle at 0mm separation distance.
3. SAR is measured for all edges and surfaces of the device with a transmitting antenna located within 25 mm from that surface or edge.
4. SAR test tissue-simulating liquid parameter: refer to IEC/IEEE 62209-1528：2020.

## 13.1 Extremity SAR

**<NFC SAR>**

| Plot No. | Band | Mode | Test Position | Gap (mm) | Freq. (MHz) | Power Drift (dB) | Measured 10g SAR (W/kg) |
|---|---|---|---|---|---|---|---|
| 01 | NFC | ASK | Front | 0mm | 13.56 | 0.01 | **0.056** |
| | NFC | ASK | Back | 0mm | 13.56 | -0.01 | 0.010 |
| | NFC | ASK | Left Side | 0mm | 13.56 | 0.02 | 0.017 |
| | NFC | ASK | Right Side | 0mm | 13.56 | -0.08 | 0.018 |
| | NFC | ASK | Top Side | 0mm | 13.56 | -0.07 | 0.017 |
| | NFC | ASK | Bottom Side | 0mm | 13.56 | 0.01 | 0.001 |

# 14. Simultaneous Transmission Analysis

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

**General Note:**

1. The CWM100 WWAN/WLAN/Bluetooth module is also integrated into this host. The WWAN/WLAN/Bluetooth power and SAR testing data can be found in the Sporton SAR Test Report, Report No. FA593093, and these results are used for simultaneous transmission analysis.
2. NFC can transmit simultaneously with other Radios in extremity exposure condition.
3. All licensed modes share the same antenna part and cannot transmit simultaneously.
4. The reported SAR summation is calculated based on the same configuration and test position
5. 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.
6. 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≤ 0.10 for 10g SAR, simultaneously transmission SAR measurement is not necessary.
   iv) Simultaneously transmission SAR measurement, and the reported multi-band 10g SAR < 4.0W/kg.

## 14.1 Extremity Exposure Conditions

＜WWAN Full Power, WLAN Full Power, BT Full Power＞

| WWAN1 | | Exposure Position | 1 | 3 | 4 | 5 | 6 | 1+3+6 Summed 10g SAR (W/kg) | 1+4+6 Summed 10g SAR (W/kg) | 1+5+6 Summed 10g SAR (W/kg) |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | WWAN1 | 2.4GHz WLAN Ant 1 | 5GHz WLAN Ant 1 | Bluetooth Ant 1 | NFC | | | |
| | | | 10g SAR (W/kg) | 10g SAR (W/kg) | 10g SAR (W/kg) | 10g SAR (W/kg) | 10g SAR (W/kg) | | | |
| All | Ant 0 | Front | 1.027 | 0.067 | 0.080 | 0.001 | 0.056 | 1.15 | 1.16 | 1.08 |
| | | Back | 2.592 | 0.350 | 0.675 | 0.067 | 0.010 | 2.95 | 3.26 | 2.67 |
| | | Left Side | 0.280 | 0.231 | 0.304 | 0.044 | 0.017 | 0.53 | 0.60 | 0.34 |
| | | Right Side | 1.820 | 0.001 | 0.001 | 0.001 | 0.018 | 1.84 | 1.84 | 1.84 |
| | | Top Side | 0.089 | 0.122 | 0.177 | 0.024 | 0.017 | 0.23 | 0.28 | 0.13 |
| | | Bottom Side | 0.894 | 0.001 | 0.017 | 0.001 | 0.001 | 0.90 | 0.91 | 0.90 |

**Test Engineer**：Martin Li, Light Wang

# 15. Uncertainty Assessment

Declaration of Conformity:
The test results with all measurement uncertainty excluded is 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.

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) $\kappa$ 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%** |

# 16. 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] 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)”

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

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

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

[8] SPEAG DASY System Handbook

# 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------