FCC AND ISED SAR TEST REPORT

Applicant	:	Tonly Technology Co., Ltd.
Address of Applicant	:	Section 37, Zhongkai High-tech Development Zone, Huizhou City, Guangdong Province, P.R. China
Manufacturer	:	Tonly Technology Co., Ltd.
Address of Manufacturer	:	Section 37, Zhongkai High-tech Development Zone, Huizhou City, Guangdong Province, P.R. China
Equipment under Test	:	LoRa Backpack
Model No.	:	LBP-001
FCC ID	:	ZVAOH000038
IC	:	9976A-OH000038
Test Standard(s)	:	Test Standard Used: IEEE Std. 1528-2013; IEC/IEEE 62209-1528:2020 FCC Rules and Regulations: 47 CFR § 2.1093 ISED Rules and Regulations: RSS-102 Issue6, Dec. 2023 Test Procedure Used: KDB447498 D02 v02r01, KDB447498 D04 v01, KDB 865664 D01 v01r04, KDB 865664 D02 v01r02 RSS-102.SAR.MEAS Issue 2, Aug. 2025
Report No.	:	DDT-RE26030330-2E06
Issue Date	:	2026/04/24
Issue By	:	Guangdong Dongdian Testing Service Co., Ltd.
Address of Laboratory	:	Unit 2, Building 1, No. 17, Zongbu 2nd Road, Songshan Lake Park, Dongguan, Guangdong, China, 523808

REPORT

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Test Report Declare

Applicant	:	Tonly Technology Co., Ltd.
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IEEE Std. 1528-2013; IEC/IEEE 62209-1528:2020, FCC Rules and Regulations: 47 CFR § 2.1093, ISED Rules and Regulations: RSS-102 Issue6, Dec. 2023

Test Procedure Used:

KDB447498 D02 v02r01, KDB447498 D04 v01, KDB 865664 D01 v01r04, KDB 865664 D02 v01r02, RSS-102.SAR.MEAS Issue 2, Aug. 2025

We Declare:

The equipment described above is tested by Guangdong Dongdian Testing Service Co., Ltd and in the configuration tested the equipment complied with the standards specified above. The test results are contained in this test report and Guangdong Dongdian Testing Service Co., Ltd is assumed of full responsibility for the accuracy and completeness of these tests.

After test and evaluation, our opinion is that the equipment provided for test compliance with the requirement of the above FCC and ISED standards.

Report No.:	DDT-RE26030330-2E06		
Date of Receipt:	2026/03/05	**Date of Test:**	2026/03/05 - 2026/04/16

Created: Johnson Huang	Reviewed: Zoe Peng	Approved: Ella Gong
Johnson Huang	Zoe Peng	Ella Gong
2026/04/16	2026/04/24	2026/04/24

Note: This report applies to above tested sample only. This report shall not be reproduced in parts without written approval of Guangdong Dongdian Testing Service Co., Ltd.

Revision History

Version	Revision Content	Issue Date	Approved
V0	Initial issue	2026/04/24	Ella Gong

1. General test information

1.1. Description of EUT

EUT Name	:	LoRa Backpack
Model No.	:	LBP-001
Difference of model number	:	/
EUT Function Description	:	Please reference user manual of this device
Power Supply	:	DC 5V from USB cable
Radio Specification	:	Lora
Operation Frequency	:	2402 MHz to 2480 MHz 903.9MHz - 905.3MHz, 904.6MHz, 923.3 - 927.5MHz
Modulation	:	GFSK
Antenna Type	:	FPC Antenna
Max Antenna Gain(dBi)	:	Ant1: 1.92 Ant2: 2.14 Ant3: -1.37

Note1：EUT is the abbreviation of equipment under test.

1.2. Accessories of EUT

Accessories	Manufacturer	Model number	Description
/	/	/	/

1.3. Assistant equipment used for test

Accessories	Manufacturer	Model number	Description
N/A	N/A	N/A	N/A

1.4. Block diagram of EUT configuration for test

EUT

Test software: sscom.exe

1.5. Test environment conditions

During the measurement the environmental conditions were within the listed ranges:

Condition	Normal Condition	Extreme Condition
Relative Humidity	20-75%	N/A
Temperature(℃)	18℃-25℃	N/A
Voltage(V)	5V	N/A

1.6. Test laboratory

Guangdong Dongdian Testing Service Co., Ltd.

Add: Unit 2, Building 1, No.17, Zongbu 2nd Road, Songshan Lake Park, Dongguan, Guangdong, China, 523808

Tel.: +86-0769-38826678, http://www.dgddt.com, Email: ddt@dgddt.com.

CNAS Accreditation No. L6451; A2LA Accreditation Number: 3870.01

FCC Designation Number: CN1182, Test Firm Registration Number: 540522

Innovation, Science and Economic Development Canada Site Registration Number: 10288A

Conformity Assessment Body identifier: CN0048

VCCI facility registration number: C-20087, T-20088, R-20123, R-20155, G-20118

2. Summary of test results

2.1. Report SAR results

Band	Test Position	Max. Reported SAR (W/kg)	SAR limit (W/kg)	Verdict
Lora 2.4G Ant1	Body(1-g) 0mm	0.563	1.6	Pass
Lora 2.4G Ant2	Body(1-g) 0mm	0.853	1.6	Pass
Lora 900M Ant3	Body(1-g) 0mm	0.145	1.6	Pass
Simultaneous Transmission	Body(1-g) 0mm	1.561	1.6	Pass

EUT is compliant with Uncontrolled Environment General Population.
EUT have the same physical, mechanical, and thermal characteristics and operational tolerances expected for production units

2.2. RF exposure limits

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

Notes:

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

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

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

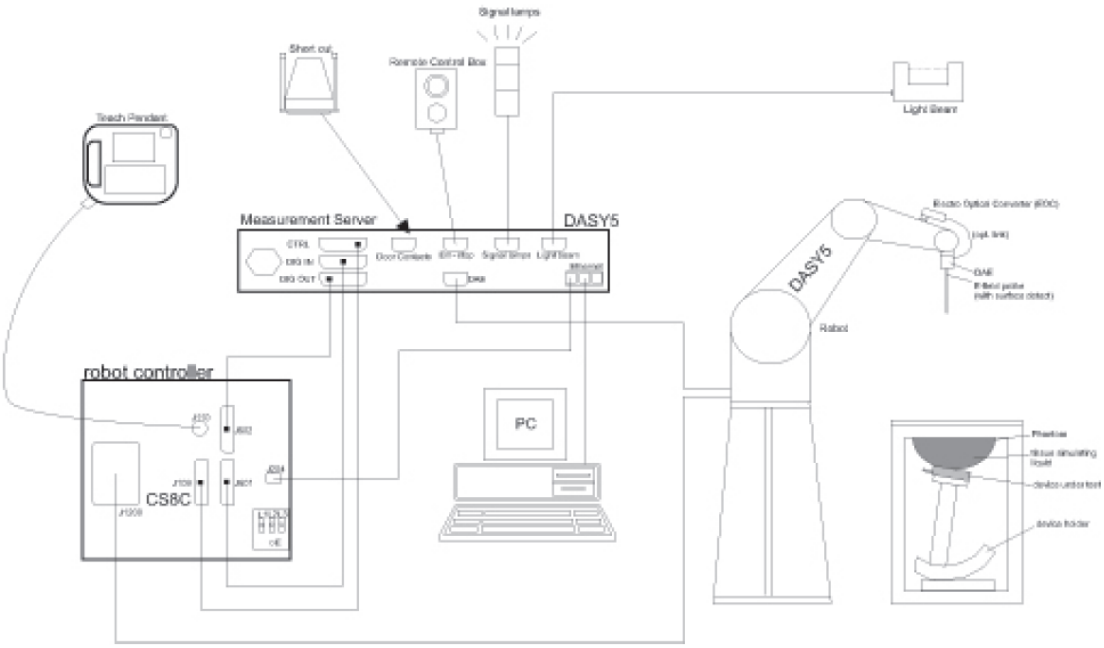
4) Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

5) 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.)

3. SAR measurements system configuration

3.1. The SAR measurement system

This SAR Measurement System uses a computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the tissue-Simulate.



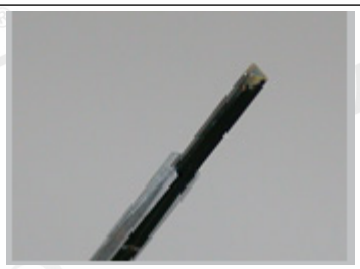
The DASY5 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software. An arm extension for accommodation the data acquisition electronics (DAE).
- An isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- 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 between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected 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.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7.
- DASY52 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning

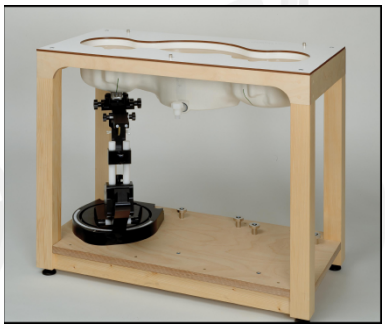
lamps, etc.

- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

3.2. Isotropic E-field probe EX3DV4

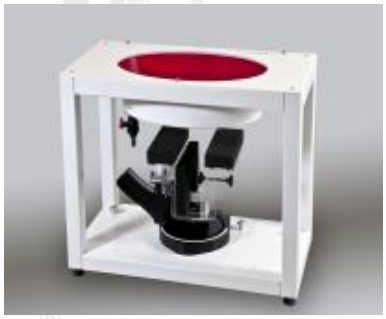
	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 Db (30 MHz to 6 GHz)
Directivity	± 0.3 Db in TSL (rotation around probe axis) ± 0.5 Db in TSL (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 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
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

3.3. SAM twin phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	10esolut. 25 liters	
Wooden Support	SPEAG standard phantom table	
The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. 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		

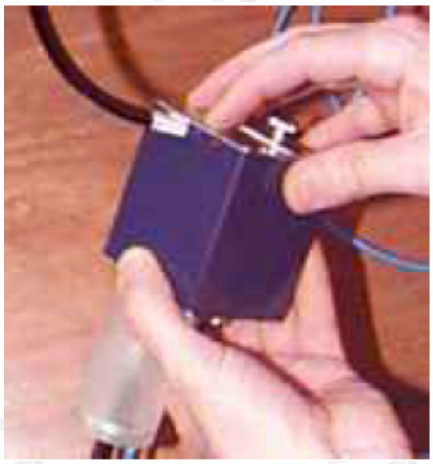
phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.
Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

3.4. ELI phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	11esolut. 30 liters	
Wooden Support	SPEAG standard phantom table	

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.
ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure.

3.5. Data acquisition electronics (DAE)

Model	DAE4	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mv (16 bit resolution and two range settings: mV,400 mV)	
Input Offset Voltage	< 5mv (with auto zero)	
Input Bias Current	< 50 fA	
Dimensions	60 x 60 x 68 mm	

3.6. Device holder for transmitters

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity ε=3 and loss tangent δ=0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

4. Measurement procedure

4.1. Scanning procedure

Step 1: Power reference measurement

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: Area scan

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm.Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Zoom scan

Around this point, a volume of 30mm*30mm*30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5x5x7 points (≤2GHz) and 7x7x7 points (≥2GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:
The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification). The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.
The area and zoom scan resolutions specified in the table below must be applied to the SAR measurements Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE 1528-2013.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 mm ± 1 mm	½·δ·ln(2) mm ± 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.	
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	≤ 1.5·$\Delta z_{Zoom}(n-1)$ mm	
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 IEEE Std 1528-2013 for details.

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

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max. ± 5 %

Step 5: Z-Scan (FCC only)

The Z scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation, the extrapolated distance should not be greater than the step size in Z-direction.

According to RSS-102.SAR.MEAS, SAR evaluations in the range of 4 MHz to 6 GHz shall be made in accordance with the latest version of IEC/IEEE 62209-1528 with the deviations outlined below:

1)Clause 7.6 of IEC/IEEE 62209-1528 is not applicable for device certification. Instead the provisions of this RSS shall be followed.

2) The SAR assessment procedures for Long-Term Evolution (LTE)devices provided in Federal Communications Commission (FCC)knowledge database (KDB) 941225 D05 take precedence over clause 7.9.3.6 of IEC/IEEE 62209-1528. ISED accepts the fast SAR testing procedures set forth in clause7.9.2 of IEC/IEEE 62209-1528

According to the reference distribution functions specified in IEC/IEEE 62209-1528:2020 :

Parameter	DUT transmit frequency being tested	
	$f \leq 3$ GHz	3 GHz < $f \leq 10$ GHz
Maximum distance between the measured points (geometric centre of the sensors) and the inner phantom surface (z_{M1} in Figure 20 in mm)	5 ± 1	δ ln(2)/2 ± 0,5 [a]
Maximum spacing between adjacent measured points in mm (see O.8.3.1)[b]	20, or half of the corresponding zoom scan length, whichever is smaller	60/f, or half of the corresponding zoom scan length, whichever is smaller
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20)[c]	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Tolerance in the probe angle	1°	1°

[a] δ is the penetration depth for a plane-wave incident normally on a planar half-space.

[b] See Clause O.8 on how Δx and Δy may be selected for individual area scan requirements.

[c] The probe angle relative to the phantom surface normal is restricted due to the degradation in the measurement accuracy in fields with steep spatial gradients. The measurement accuracy decreases with increasing probe angle and increasing frequency. This is the reason for the tighter probe angle restriction at frequencies above 3 GHz.

Parameter	DUT transmit frequency being tested	
	$f \leq 3$ GHz	3 GHz < $f \leq 10$ GHz
Maximum distance between the closest measured points and the phantom surface (z_{M1} in Figure 20 and Table 3, in mm)	5	$\delta \ln(2)/2$ [a]
Maximum angle between the probe axis and the phantom surface normal (α in Figure 20)	5° (flat phantom only) 30° (other phantoms)	5° (flat phantom only) 20° (other phantoms)
Maximum spacing between measured points in the x- and y-directions (Δx and Δy, in mm)	8	$24/f$ [b]
For uniform grids: Maximum spacing between measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	5	$10/(f - 1)$
For graded grids: Maximum spacing between the two closest measured points in the direction normal to the phantom shell (Δz_1 in Figure 20, in mm)	4	$12/f$
For graded grids: Maximum incremental increase in the spacing between measured points in the direction normal to the phantom shell ($R_z = \Delta z_2/\Delta z_1$ in Figure 20)	1,5	1,5
Minimum edge length of the zoom scan volume in the x- and y-directions (L_z in O.8.3.2, in mm)	30	22
Minimum edge length of the zoom scan volume in the direction normal to the phantom shell (L_h in O.8.3.2 in mm)	30	22
Tolerance in the probe angle	1°	1°

[a] δ is the penetration depth for a plane-wave incident normally on a planar half-space.

[b] This is the maximum spacing allowed, which might not work for all circumstances.

5. Description of test position

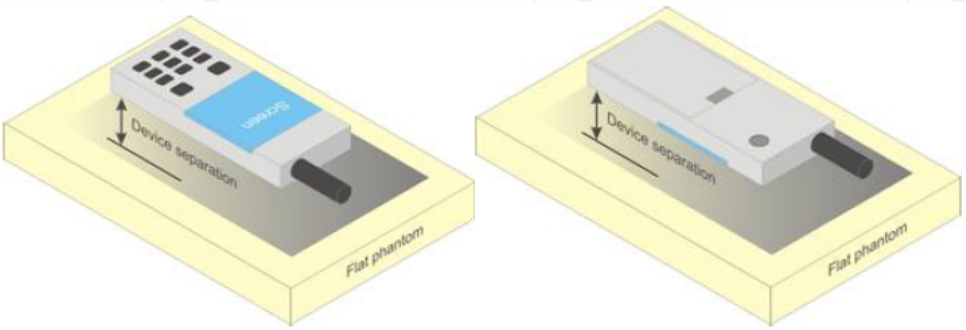
5.1. Body-worn accessory configurations

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations.

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration. Per FCC KDB Publication 648474 D04, Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in FCC KDB Publication 447498 D04 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for a body-worn accessory, measured without a headset connected to the handset, is > 1.2 W/kg, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a headset attached to the handset.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with the device with each accessory. If multiple accessories share an identical metallic component (i.e., the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used. Test position spacing was documented. Transmitters that are designed to operate in front of a person’s face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.



5.2. Extremity exposure configurations

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions: i.e., hands, wrists, feet and ankles, may require extremity SAR evaluation. When the device also operates in close proximity to the user's body, SAR compliance for the body is also required. The 1-g body and10-g extremity SAR Exclusion Thresholds found in KDB Publication 447498 D04v01 should be applied to determine SAR test requirements.
For smart phones with a display diagonal dimension >15.0 cm or an overall diagonal dimension > 16.0 cm that provide similar mobile web access and multimedia support found in mini-tablets or UMPC mini-tablets that support voice calls next to the ear. the phablets procedures outlined in KDB Publication 648474 D04 v01r03 should be applied to evaluate SAR compliance. A device marketed as phablets, regardless of form factors and operating characteristics must be tested as a phablet to determine SAR compliance. In addition to the normally required head and body-worm accessory SAR test procedures required for handsets, the UMPC mini-tablet procedures must also be applied to test the SAR of all surfaces and edges with an antenna <=25 mm from that surface or edge, in direct contact with the phantom, for 10-g SAR. The UMPC mini-tablet 1-g SAR at 5 mm is not required. When hotspot mode applies, 10-g SAR is required only for the surfaces and edges with hotspot to the maximum output power (including tolerance) is 1-g SAR > 1.2 W/kg.

5.3. Head exposure configurations

Devices that are designed to transmit next to the ear and operate according to the handset procedures in IEEE Std 1528-2013, or conditions described in the published RF exposure KDB procedures, must be tested using the SAM phantom defined in IEEE Std 1528-2013. When antennas are near the bottom of a handset and the peak SAR location is located in regions of the SAM phantom where SAR probe access can be limited, the procedures in KDB Publication 648474 D04 must be applied. Other head exposure conditions, for example, in-front-of the face, should be tested using a flat phantom according to the required published RF exposure KDB procedures.

6. RF exposure conditions

6.1. EUT Test sides

SAR test sides							
Antenna	Band	Body					
		Front	Back	Top	Bottom	Left	Right
ANT1	Lora 2.4G	√	√	√	√	√	√
ANT2	Lora 2.4G	√	√	√	√	√	√
ANT3	Lora 900M	√	√	√	√	√	√

6.2. Standalone SAR test exclusion considerations

According to the KDB447498, the SAR test exclusion threshold：

Frequency（MHz）	Distance(mm)									
	\	5	10	15	20	25	30	35	40	45	50
	300	39	65	88	110	129	148	166	184	201	217
	450	22	44	67	89	112	135	158	180	203	226
	835	9	25	44	66	90	116	145	175	207	240
	1900	3	12	26	44	66	92	122	157	195	236
	2450	3	10	22	38	59	83	111	143	179	219
	3600	2	8	18	32	49	71	96	125	158	195
	5800	1	6	14	25	40	58	80	106	136	169

Devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table, based on the separation distance, are exempt from SAR evaluation, The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply. According to RSS-102, the SAR test exclusion threshold:

Frequency (MHz)	≤5 mm（mW）	10 mm（mW）	15 mm（mW）	20 mm（mW）	25 mm（mW）	30 mm（mW）	35 mm（mW）	40 mm（mW）	45 mm（mW）	＞50 mm（mW）
≤300	45	116	139	163	189	216	246	280	319	362
450	32	71	87	104	124	147	175	208	248	296
835	21	32	41	54	72	96	129	172	228	298
1900	6	10	18	33	57	92	138	194	257	323
2450	3	7	16	32	56	89	128	170	209	245
3500	2	6	15	29	50	72	94	114	134	158
5800	1	5	13	23	32	41	54	74	102	128

7. SAR system verification procedure

7.1. Tissue simulate liquid

7.1.1. Target dielectric properties of head tissue-equivalent material

Frequency (MHz)	Relative permittivity (ε_r)	Conductivity (σ) (S/m)
300	45.3	0.87
450	43.5	0.87
750	*41.9*	*0.89*
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1500	*40.4*	*1.23*
1640	*40.2*	*1.31*
1750	*40.1*	*1.37*
1800	40.0	1.40
1900	40.0	1.40
2000	40.0	1.40
2100	*39.8*	*1.49*
2300	*39.5*	*1.67*
2450	39.2	1.80
2600	*39.0*	*1.96*
3000	38.5	2.40
3500	*37.9*	*2.91*
4000	*37.4*	*3.43*
4500	*36.8*	*3.94*
5000	*36.2*	*4.45*
5200	*36.0*	*4.66*
5400	*35.8*	*4.86*
5600	*35.5*	*5.07*
5800	35.3	5.27
6000	*35.1*	*5.48*

NOTE—For convenience, permittivity and conductivity values at some frequencies that are not part of the original data from Drossos et al. [B60] or the extension to 5800 MHz are provided (i.e., the values shown in italics). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6000 MHz that were linearly extrapolated from the values at 3000 MHz and 5800 MHz.

7.1.2. Measurement for tissue simulate liquid

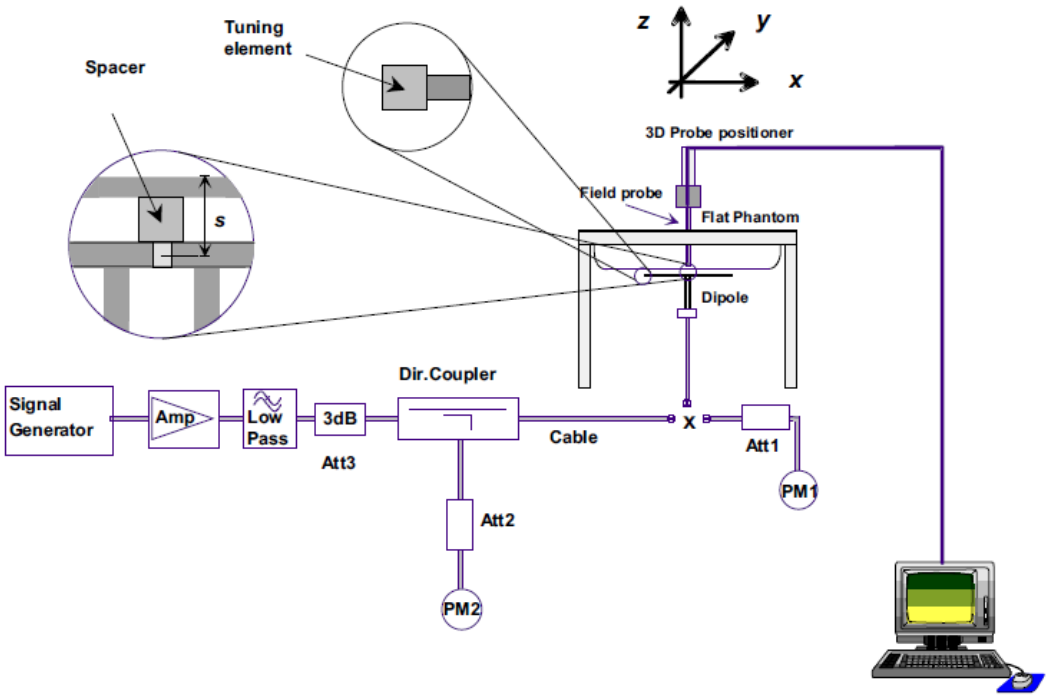
The dielectric properties for this Tissue Simulate Liquids were measured by using the Agilent Model 85070E Dielectric Probe in conjunction with Agilent E5071C Network Analyzer (300 KHz-8500 MHz). The Conductivity (σ) and Permittivity (ρ) are listed in table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was ±2°C.

Tissue Type	Freq. (MHz)	Target Tissue (±5%)		Measured Tissue		Liquid Temp.	Measured Date
		ε_r	σ(S/m)	ε_r	σ(S/m)	(℃)	
2.4G head	850	41.5 (39.425~43.575)	0.92 (0.874~0.966)	41.1	0.9178	21.8	2026/04/02
	900	41.5 (39.425~43.575)	0.97 (0.922~1.019)	40.99	0.9407	21.8	2026/04/02
	950	41.4 (39.33~43.47)	0.99 (0.941~1.040)	40.88	0.9636	21.8	2026/04/02
	2360	39.38 (37.411~41.349)	1.722 (1.6359~1.808)	39.22	1.711	22.0	2026/04/08
	2402	39.3 (37.33-41.27)	1.76 (1.672-1.848)	38.92	1.737	22.0	2026/04/08
	2440	39.22 （37.25-41.18）	1.79 （1.7005-1.879）	38.61	1.755	22.0	2026/04/08
	2441	39.22 （37.25-41.18）	1.79 （1.7005-1.879）	38.61	1.755	22.0	2026/04/08
	2450	39.20 (37.240~41.160)	1.80 (1.710~1.890)	38.59	1.767	22.0	2026/04/08
	2480	39.16 （37.20-41.12）	1.83 （1.750-1.920）	38.62	1.788	22.0	2026/04/08
	2540	39.02 (37.069~40.971)	1.878 (1.7841~1.972)	38.54	1.838	22.0	2026/04/08

Head tissue

7.2. SAR system validation

The microwave circuit arrangement for system verification is sketched in bellow figure. 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 +/- 10% from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the table 5 (A power level of 250mw was input to the dipole antenna). During the tests, The laboratory temperature range shall not exceed 2℃, the relative humidity was in the range 75% and 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.



7.2.1. Justification for extended SAR dipole calibrations

1) Referring to KDB865664 D01 requirements for dipole calibration, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.

a) There is no physical damage on the dipole;

b) System check with specific dipole is within 10% of calibrated value;

c) Return-loss is within 10% of calibrated measurement;

d) Impedance is within 5Ω from the previous measurement.

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

7.2.2. Validation test setup photograph

7.2.3. Summary system validation results

Validation Kit		Measured SAR 100mW (W/kg)	Measured SAR normalized to 1w (W/kg)	Target SAR normalized to 1w (±10%) (W/kg)	Liquid Temp. (℃)	Measured Date
D2450V2 @2450MHz	1-g	5.39	53.9	52.8 (47.52~58.08)	22.0	2026/04/08
	10-g	2.63	26.3	24.6 (22.14~27.06)	22.0	2026/04/08
D900V2 @900MHz	1-g	1.12	11.2	10.8 (9.72~11.88)	21.8	2026/04/02
	10-g	0.748	7.48	7.06 (6.354~7.766)	21.8	2026/04/02

7.2.4. Detailed system validation results

See the Appendix A.

8. Equipment list

Test Platform	SPEAG DASY5 Professional				
Location	SAR room				
Description	SAR Test System (Frequency range 300MHz-6GHz)				
Equipment	Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
Robot	Staubli	TX90 XL	F12/5N3XC/A/01	NCR	NCR
ELI Phantom	SPEAG	QDOVA002 AA	1752	NCR	NCR
Data Acquisition Electronics	SPEAG	DAE4	1366	2025-05-28	2026-05-27
SAR test Probe	SPEAG	EX3DV4	3906	2025-05-28	2026-05-27
Validation Kits	SPEAG	D2450V2	904	2025-02-18	2028-02-17
Validation Kits	SPEAG	D900V2	1d150	2025-12-09	2028-12-07
Agilent Network Analyzer	Agilent	E5071C	MY46316792	2026-03-28	2027-03-27
Dielectric Probe Kit	Agilent	85070E	85070-20037	NCR	NCR
0.1G-2Ghz DUAL DIRECTIONAL COUPLER	Agilent	778D	MY52180233	NCR	NCR
2G-18Ghz DUAL DIRECTIONAL COUPLER	Agilent	772D	MY52180116	NCR	NCR
Signal Generator	Agilent	N5182A	MY19060405	2026-03-28	2027-03-27
Preamplifier	Mini-Circuits	ZHL-42W	QA1240001	NCR	NCR
Preamplifier	Mini-Circuits	ZVE-8G+	926701231	NCR	NCR
EPM Series Power Meter	Agilent	E4417A	MY50000999	2026-03-28	2027-03-27
Power Sensor	Agilent	E9327A	MY44420458	2026-03-28	2027-03-27
Power Sensor	Agilent	E9327A	MY44420760	2026-03-28	2027-03-27
Attenuator	Agilent	8491A 3dB	MY52460179	NCR	NCR
Attenuator	Agilent	8491A 10dB	MY52460275	NCR	NCR
Humidity and Temperature Indicator	Euchamp Electronics	YSWS53020 B	20210916	2025-08-13	2026-08-12
Test software	Speag	DASY5	V52.10.4.1535	N/A	N/A

9. Measurement uncertainty

Uncertainty Component	probability distribution	Contains the factor	Standard uncertainty Ui	C1(1g)	C1(10g)
Sensitivity of probe	N	1	±6.55%	1	1
Isotropy of the probe	R	√3	±1.08%	1	1
Linearity of the probe	R	√3	±0.35%	1	1
Coupling effect between probe and dielectric boundary	R	√3	±0.46%	1	1
The detection limit of the system	R	√3	±0.14%	1	1
Errors in electronic reading equipment	N	1	±0.35%	1	1
Measure the response time of the equipment	R	√3	0	1	1
Measure the integral time of the equipment	R	√3	±1.50%	1	1
Data post-processing algorithm	R	√3	±0.58%	1	1
Electromagnetic environment disturbance	R	√3	±1.73%	1	1
the positioning accuracy of the probe	R	√3	±0.87%	1	1
The positioning accuracy of the probe tip relative to the model surface	R	√3	±1.67%	1	1
Manufacturing tolerances for models	R	√3	±2.31%	1	1
Deviation of measured liquid conductivity from target value	R	√3	±2.89%	0.64	0.43
Liquid conductivity test system accuracy	N	1	±2.5%	0.64	0.43
The deviation between the measured permittivity of liquid and the target value	R	√3	±2.89%	0.6	0.49
Test precision of liquid permittivity test system	N	1	±2.5%	0.6	0.49
The disturbance of the positioning fixture	N	1	±5.2%	1	1
Accuracy of sample positioning	N	1	±4.6%	1	1
The output power of the tested sample drifts	R	√3	±2.89%	1	1
Combined standard uncertainty	Uc(1g)=11.3%, Uc(10g)=11.0%				
Expanded uncertainty (95% confidence interval) k=2	U(1g)=22.6%, U(10g)=22%				

10. Measurement of Body SAR data

10.1. RF conducted power

SRD							
Conducted power							
Mode	Channel	Frequency (MHz)	Power (dBm)	E.I.R.P Power (dBm)	Duty-Cycle	Max. Tune-up Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)
Lora 2.4G	0	2402	7.15	9.07	0.2414	8.0	9.92
	39	2441	7.48	9.40	0.2388	8.0	9.92
	78	2480	8.29	10.21	0.2422	8.5	10.42
Lora 2.4G Ant2	0	2402	7.18	9.32	0.2422	8.0	10.14
	39	2441	7.55	9.69	0.2388	8.0	10.14
	78	2480	8.25	10.39	0.2422	8.5	10.64

SRD							
Conducted power							
Mode	Channel	Frequency (MHz)	Power (dBm)	E.I.R.P Power (dBm)	Duty-Cycle	Max. Tune-up Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)
Lora Hybrid SF7	0	903.9	8.35	6.98	1	8.5	7.13
	3	904.5	8.02	6.65	1	8.5	7.13
	7	905.3	8.09	6.72	1	8.5	7.13
Lora Hybrid SF9	0	903.9	8.21	6.84	1	8.5	7.13
	3	904.5	8.07	6.70	1	8.5	7.13
	7	905.3	8.14	6.77	1	8.5	7.13
Lora Hybrid SF10	0	903.9	8.23	6.86	1	8.5	7.13
	3	904.5	8.13	6.76	1	8.5	7.13
	7	905.3	8.09	6.72	1	8.5	7.13

SRD							
Conducted power							
Mode	Channel	Frequency (MHz)	Power (dBm)	E.I.R.P Power (dBm)	Duty-Cycle	Max. Tune-up Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)
LORA DTS SF7	0	923.3	11.08	9.71	1	11.5	10.13
	3	925.1	12.15	10.78	1	12.5	11.13
	7	927.5	11.61	10.24	1	12.0	10.63
LORA DTS SF12	0	923.3	10.97	9.60	1	11.0	9.63
	3	925.1	11.81	10.44	1	12.0	10.63
	7	927.5	11.36	9.99	1	11.5	10.13
LORA DTS SF8	0	904.6	10.72	9.35	1	11.0	9.63

Note:

1) The output power of the device was set to transmit at maximum power for all test.
2) According to KDB447498, Lora Hybrid Conforms to SAR test reduction procedures does not require testing. The maximum output power mode is LORA DTS SF7, select LORA DTS SF7 mode to test SAR.

10.2. Measurement of SAR data

ANT1 SRD Body 0mm SAR 1-g											
Test position	Test mode	Test Freq (MHz)	Duty Cycle	SAR 1-g (W/kg)	Power drift (dB)	E.I.R.P Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)	Scaled factor	Scaled SAR 1-g (W/kg)	Liquid Temp. (℃)	SAR limit 1-g (W/kg)
Top	Lora 2.4G	2480	0.2422	0.130	0.19	10.21	10.42	4.333	**0.563**	21.7	1.6
Bottom	Lora 2.4G	2480	0.2422	0.089	0.07	10.21	10.42	4.333	0.386	21.7	1.6
Front	Lora 2.4G	2480	0.2422	0.022	-0.03	10.21	10.42	4.333	0.095	21.7	1.6
Back	Lora 2.4G	2480	0.2422	0.024	0.09	10.21	10.42	4.333	0.104	21.7	1.6
Left	Lora 2.4G	2480	0.2422	0.045	-0.16	10.21	10.42	4.333	0.195	21.7	1.6
Right	Lora 2.4G	2480	0.2422	0.092	-0.13	10.21	10.42	4.333	0.399	21.7	1.6
Top	Lora 2.4G	2441	0.2388	0.110	0.13	9.40	9.92	4.720	0.519	21.7	1.6
Top	Lora 2.4G	2402	0.2414	0.082	-0.04	9.07	9.92	5.038	0.413	21.7	1.6

ANT2 SRD Body 0mm SAR 1-g											
Test position	Test mode	Test Freq (MHz)	Duty Cycle	SAR 1-g (W/kg)	Power drift (dB)	E.I.R.P Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)	Scaled factor	Scaled SAR 1-g (W/kg)	Liquid Temp. (℃)	SAR limit 1-g (W/kg)
Top	Lora 2.4G	2480	0.2422	0.195	-0.09	10.39	10.64	4.373	**0.853**	21.7	1.6
Bottom	Lora 2.4G	2480	0.2422	0.107	0.07	10.39	10.64	4.373	0.468	21.7	1.6
Front	Lora 2.4G	2480	0.2422	0.042	0.08	10.39	10.64	4.373	0.184	21.7	1.6
Back	Lora 2.4G	2480	0.2422	0.070	0.03	10.39	10.64	4.373	0.306	21.7	1.6
Left	Lora 2.4G	2480	0.2422	0.071	-0.16	10.39	10.64	4.373	0.311	21.7	1.6
Right	Lora 2.4G	2480	0.2422	0.066	0.16	10.39	10.64	4.373	0.289	21.7	1.6
Top	Lora 2.4G	2441	0.2388	0.117	-0.16	9.69	10.14	4.645	0.543	21.7	1.6
Top	Lora 2.4G	2402	0.2422	0.147	0.13	9.32	10.14	4.987	0.733	21.7	1.6

ANT 3 SRD Body 0mm SAR 1-g											
Test position	Test mode	Test Freq (MHz)	Duty Cycle	SAR 1-g (W/kg)	Power drift (dB)	E.I.R.P Power (dBm)	Max. Tune-up E.I.R.P Power (dBm)	Scaled factor	Scaled SAR 1-g (W/kg)	Liquid Temp. (℃)	SAR limit 1-g (W/kg)
Top	LORA DTS SF7	925.1	1	0.134	0.12	10.78	11.13	1.084	**0.145**	21.7	1.6
Bottom	LORA DTS SF7	925.1	1	0.037	0.17	10.78	11.13	1.084	0.040	21.7	1.6
Front	LORA DTS SF7	925.1	1	0.016	-0.06	10.78	11.13	1.084	0.017	21.7	1.6
Back	LORA DTS SF7	925.1	1	0.021	-0.14	10.78	11.13	1.084	0.023	21.7	1.6
Left	LORA DTS SF7	925.1	1	0.023	-0.15	10.78	11.13	1.084	0.025	21.7	1.6
Right	LORA DTS SF7	925.1	1	0.012	0.08	10.78	11.13	1.084	0.013	21.7	1.6
Top	LORA DTS SF7	923.3	1	0.101	0.14	9.71	10.13	1.102	0.111	21.7	1.6
Top	LORA DTS SF7	927.5	1	0.116	-0.07	10.24	10.63	1.094	0.127	21.7	1.6

Note:

1)The maximum Scaled SAR value is marked in bold. Graph Results refer to Appendix B

2)Scaled factor= (Max. Tune-up. E.I.R.P power in mW) / (E.I.R.P Power in mW) / (Duty Cycle)

3)Scaled SAR=Test SAR * Scaled factor

10.3. Simultaneous transmission SAR

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

Mode	Combination
1	Lora 2.4G ANT 1+ Lora 2.4G ANT 2+ LORA DTS SF7 ANT3

Mode1	Simultaneous transmission Head SAR				
	LORA DTS SF7 ANT3	Lora 2.4G ANT 1	Lora 2.4G ANT 2	/	
Test Position	1-g SAR (W/kg)	1-g SAR (W/kg)	1-g SAR (W/kg)	SUM 1-g SAR (W/kg)	SPLSR
Top	0.563	0.853	0.145	1.561	Excluded
Bottom	0.386	0.468	0.040	0.894	Excluded
Front	0.095	0.184	0.017	0.296	Excluded
Back	0.104	0.306	0.023	0.433	Excluded
Left	0.195	0.311	0.025	0.531	Excluded
Right	0.399	0.289	0.013	0.701	Excluded

Appendix

Appendix A: System Validation Plots

Appendix B: Highest Test Plots

Appendix C: Calibration Certification

Appendix D: Test setup photograph

END REPORT