



FCC SAR Test Report

APPLICANT : Amazon.com Services LLC
EQUIPMENT : Wireless Remote
MODEL NAME : PA38CA
FCC ID : 2A4DH-3832
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.



Approved by: Si Zhang

Sporton International Inc. (Kunshan)

**No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300
People's Republic of China**



Table of Contents

1. Statement of Compliance 4
2. Administration Data 5
3. Guidance Applied..... 5
4. Equipment Under Test (EUT) Information 6
4.1 General Information 6
5. RF Exposure Limits..... 7
5.1 Uncontrolled Environment..... 7
5.2 Controlled Environment..... 7
6. Specific Absorption Rate (SAR)..... 8
6.1 Introduction 8
6.2 SAR Definition..... 8
7. System Description and Setup 9
7.1 E-Field Probe 10
7.2 Data Acquisition Electronics (DAE) 10
7.3 Phantom..... 11
7.4 Device Holder..... 12
8. Measurement Procedures 13
8.1 Spatial Peak SAR Evaluation 13
8.2 Power Reference Measurement..... 14
8.3 Area Scan 14
8.4 Zoom Scan..... 15
8.5 Volume Scan Procedures..... 15
8.6 Power Drift Monitoring..... 15
9. Test Equipment List 16
10. System Verification 17
10.1 Tissue Simulating Liquids..... 17
10.2 Tissue Verification 17
10.3 System Performance Check Results..... 18
11. RF Exposure Positions 19
12. Conducted RF Output Power (Unit: dBm)..... 20
13. Antenna Location 21
14. SAR Test Results 22
14.1 Head SAR 23
14.2 Extremity SAR..... 23
15. Uncertainty Assessment 24
16. References 25
Appendix A. Plots of System Performance Check
Appendix B. Plots of High SAR Measurement
Appendix C. DASYS Calibration Certificate



1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for Amazon.com Services LLC, Wireless Remote, PA38CA, are as follows.

Highest 1g SAR Summary			
Equipment Class	Frequency Band		Head (Separation 10mm)
			1g SAR (W/kg)
DTS	Bluetooth	2.4GHz Bluetooth	<0.10
Highest 10g SAR Summary			
Equipment Class	Frequency Band		Extremity (Separation 0mm)
			10g SAR (W/kg)
DTS	Bluetooth	2.4GHz Bluetooth	<0.10
Date of Testing:			2023/10/28

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 (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.
	SAR01-KS	CN1257	314309

Applicant	
Company Name	Amazon.com Services LLC
Address	410 Terry Avenue N Seattle, WA 98109-5210 United States

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
- 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	Wireless Remote
Model Name	PA38CA
FCC ID	2A4DH-3832
S/N	G0G3C1013424006D
Wireless Technology and Frequency Range	Bluetooth: 2402 MHz ~ 2480 MHz
Mode	Bluetooth LE
Remark: This device supports voice control operation, and can speak to mouth, so 10mm head SAR have been performed.	

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:

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

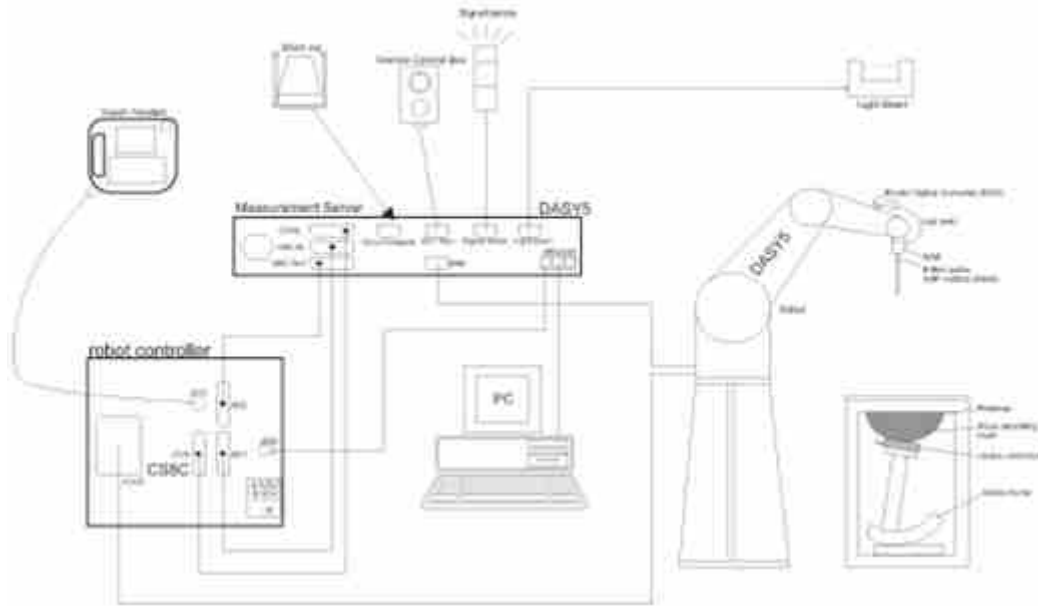
SAR is expressed in units of Watts per kilogram (W/kg)

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

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	10 MHz – >6 GHz Linearity: ±0.2 dB (30 MHz – 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 – >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 from 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	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ 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: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 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 1 st 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 <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> 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	2450MHz System Validation Kit	D2450V2	1040	2023/4/25	2024/4/24
SPEAG	Data Acquisition Electronics	DAE4	1279	2023/6/7	2024/6/6
SPEAG	Dosimetric E-Field Probe	EX3DV4	3857	2022/12/14	2023/12/13
SPEAG	SAM Twin Phantom	SAM Twin	TP-1754	NCR	NCR
CHIGO	Thermo-Hygrometer	HTC-1	55011	2023/1/8	2024/1/7
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Radio Communication Analyzer	MT8821C	6262306175	2023/7/5	2024/7/4
Agilent	ENA Series Network Analyzer	E5071C	MY46111157	2023/7/5	2024/7/4
SPEAG	Dielectric Probe Kit	DAK-3.5	1071	2023/2/20	2024/2/19
Anritsu	Vector Signal Generator	MG3710A	6201682672	2023/1/5	2024/1/4
Rohde & Schwarz	Power Meter	NRVD	102081	2023/7/5	2024/7/4
Rohde & Schwarz	Power Sensor	NRV-Z5	100538	2023/7/5	2024/7/4
Rohde & Schwarz	Power Sensor	NRV-Z5	100539	2023/7/5	2024/7/4
R&S	BLUETOOTH TESTER	CBT	101246	2023/5/15	2024/5/14
Rohde & Schwarz	Spectrum Analyzer	FSV7	101631	2023/10/11	2024/10/10
TES	DIGITAC THERMOMETER	1310	220305411	2023/1/8	2024/1/7
BONN	POWER AMPLIFIER	BLMA 0830-3	087193A	Note 1	
BONN	POWER AMPLIFIER	BLMA 2060-2	087193B	Note 1	
Agilent	Dual Directional Coupler	778D	20500	Note 1	
Agilent	Dual Directional Coupler	11691D	MY48151020	Note 1	
ARRA	Power Divider	A3200-2	N/A	Note 1	
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. 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. 10.2.



Fig 10.2 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 (ϵ_r)
For Head								
2450	55.0	0	0	0	0	45.0	1.80	39.2

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Tissue Type	Liquid Temp. ($^{\circ}\text{C}$)	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Date
2450	Head	22.8	1.824	39.243	1.80	39.20	1.33	0.11	± 5	2023/10/28

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.

<1g SAR>

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 (%)
2023/10/28	2450	Head	50	1040	3857	1279	2.510	52.70	50.2	-4.74

<10g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2023/10/28	2450	Head	50	1040	3857	1279	1.220	24.60	24.4	-0.81

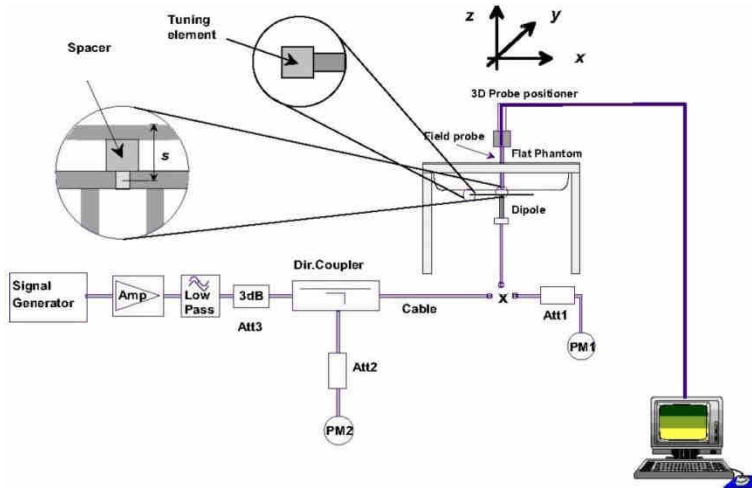


Fig 10.3.1 System Performance Check Setup



Fig 10.3.2 Setup Photo



11. RF Exposure Positions

<For Head>

- a) To position the device parallel to the phantom surface with either keypad up or down.
- b) To adjust the device parallel to the flat phantom.
- c) Transmitters that are built-in the devices typically operate in speaker mode for voice communication, to adjust the distance between the device surface and the flat phantom to 10 mm only with the front of the device positioned.

<For Hand>

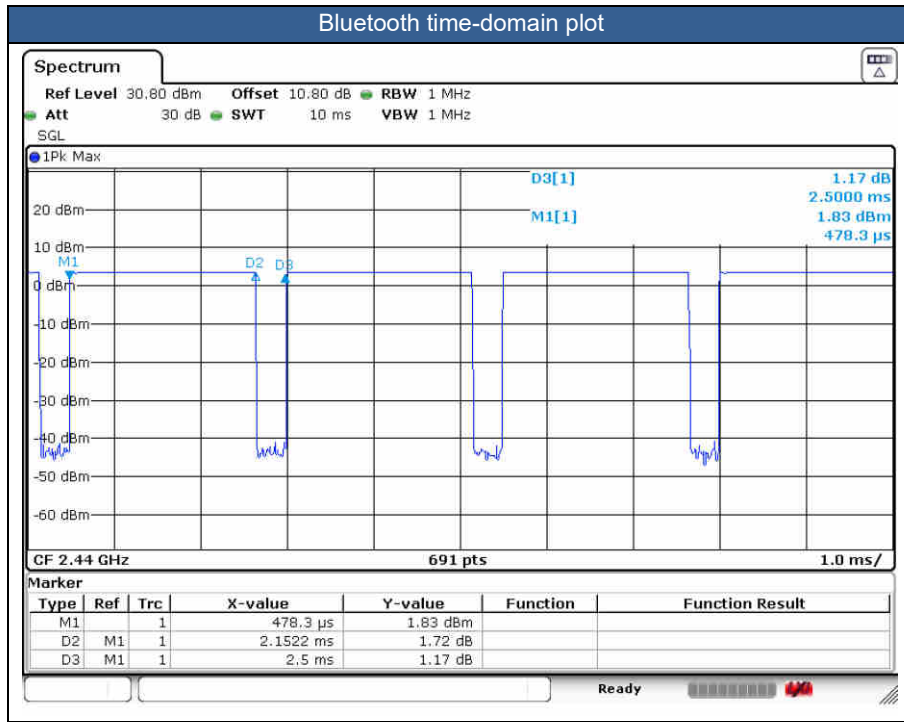
- a) The device shall be placed directly against the flat phantom, for those sides of the device that are in contact with the hand during intended use.
- b) To adjust the device parallel to the flat phantom.
- c) To adjust the distance between the device surface and the flat phantom to 0 mm.

12. Conducted RF Output Power (Unit: dBm)

<2.4GHz Bluetooth>

General Note:

- For 2.4GHz Bluetooth SAR testing was selected 1Mbps, due to its highest average power.
- The Bluetooth duty cycle is 86.09% as following figure, according to Oct. 2016 TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation.



Mode	Channel	Frequency (MHz)	Average power (dBm)	
			1Mbps	2Mbps
LE	CH 00	2402	3.27	3.38
	CH 19	2440	3.39	3.42
	CH 39	2480	3.21	3.23
Tune-up Limit			3.50	3.50



13. Antenna Location

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



14. SAR Test Results

General Note:

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For SAR testing of BT signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
 - c. For Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor
2. Per KDB 447498 D01v06, 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
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required when the measured SAR is ≥ 0.8 W/kg. 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. This device supports voice control operation, and can speak to mouth, so 10mm head SAR have been performed.



14.1 Head SAR

<Bluetooth SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	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)
01	Bluetooth	BLE 1M	Front	10	19	2440	3.39	3.50	1.026	86.09	1.162	-0.01	0.018	0.022
	Bluetooth	BLE 1M	Front	10	00	2402	3.27	3.50	1.054	86.09	1.162	-0.05	0.016	0.019
	Bluetooth	BLE 1M	Front	10	39	2480	3.21	3.50	1.069	86.09	1.162	0.03	0.017	0.021

14.2 Extremity SAR

<Bluetooth SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	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)
02	Bluetooth	BLE 1M	Front	0	19	2440	3.39	3.50	1.026	86.09	1.162	0.13	0.042	0.050
	Bluetooth	BLE 1M	Back	0	19	2440	3.39	3.50	1.026	86.09	1.162	0.01	0.015	0.017
	Bluetooth	BLE 1M	Left Side	0	19	2440	3.39	3.50	1.026	86.09	1.162	-0.05	0.003	0.004
	Bluetooth	BLE 1M	Right Side	0	19	2440	3.39	3.50	1.026	86.09	1.162	-0.02	0.012	0.014
	Bluetooth	BLE 1M	Top Side	0	19	2440	3.39	3.50	1.026	86.09	1.162	0.04	0.023	0.027
	Bluetooth	BLE 1M	Front	0	0	2402	3.27	3.50	1.054	86.09	1.162	-0.02	0.037	0.046
	Bluetooth	BLE 1M	Front	0	39	2480	3.21	3.50	1.069	86.09	1.162	-0.05	0.038	0.047

Test Engineer : Martin Li, Varus Wang, Light Wang, Ricky Gu



15. 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 $\leq 30\%$, 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.



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] SPEAG DASY System Handbook
- [5] FCC KDB 447498 D01 v06, “Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies”, Oct 2015
- [6] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [7] FCC KDB 865664 D02 v01r02, “RF Exposure Compliance Reporting and Documentation Considerations” Oct 2015.

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



Appendix A. Plots of System Performance Check

The plots are shown as follows.

System Check_Head_2450MHz

DUT: D2450V2 - SN:1040

Communication System: UID 0, CW (0); Frequency: 2450 MHz; Duty Cycle: 1:1

Medium: HSL_2450 Medium parameters used: $f = 2450$ MHz; $\sigma = 1.824$ S/m; $\epsilon_r = 39.243$; $\rho = 1000$ kg/m³

Ambient Temperature : 23.3 °C; Liquid Temperature : 22.8 °C

DASY5 Configuration:

- Probe: EX3DV4 - SN3857; ConvF(7.71, 7.71, 7.71); Calibrated: 2022/12/14
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1279; Calibrated: 2023/6/7
- Phantom: SAM Twin Phantom; Type: SAM Twin; Serial: TP-1754
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Pin=50mW/Area Scan (71x71x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 3.27 W/kg

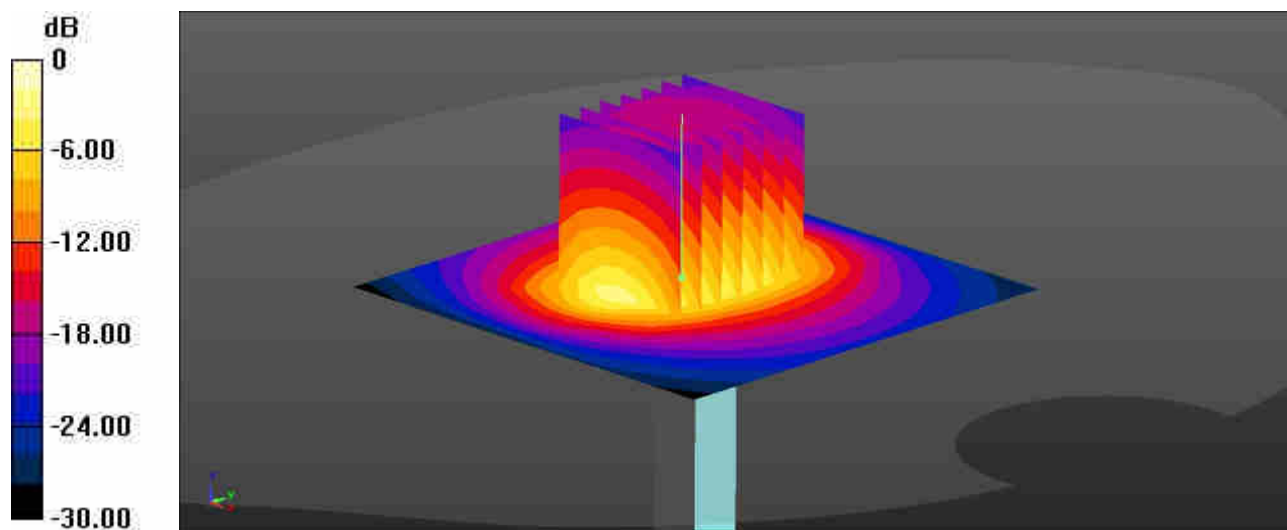
Pin=50mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 37.21 V/m; Power Drift = 0.09 dB

Peak SAR (extrapolated) = 4.98 W/kg

SAR(1 g) = 2.51 W/kg; SAR(10 g) = 1.22 W/kg

Maximum value of SAR (measured) = 3.18 W/kg



0 dB = 3.18 W/kg = 5.02 dBW/kg



Appendix B. Plots of High SAR Measurement

The plots are shown as follows.

01_Bluetooth_BLE 1M 5.0_Front_10mm_Ch19

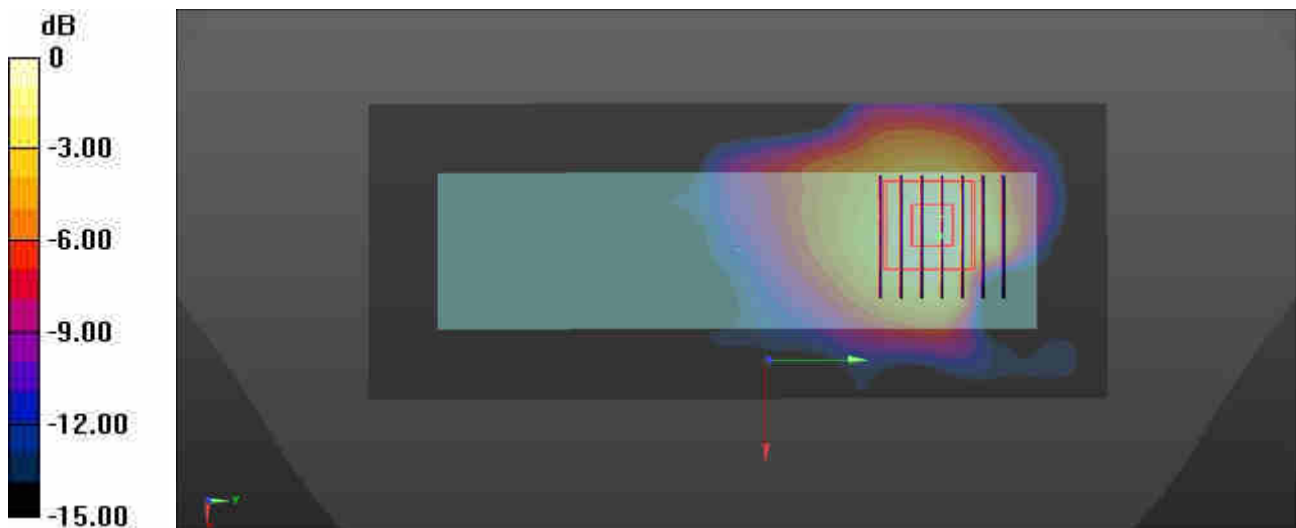
Communication System: UID 0, Bluetooth (0); Frequency: 2440 MHz; Duty Cycle: 1:1.162
Medium: HSL_2450 Medium parameters used: $f = 2440$ MHz; $\sigma = 1.815$ S/m; $\epsilon_r = 39.273$; $\rho = 1000$ kg/m³
Ambient Temperature : 23.3 °C; Liquid Temperature : 22.8 °C

DASY5 Configuration:

- Probe: EX3DV4 - SN3857; ConvF(7.71, 7.71, 7.71); Calibrated: 2022/12/14
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1279; Calibrated: 2023/6/7
- Phantom: SAM Twin Phantom; Type: SAM Twin; Serial: TP-1754
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Area Scan (61x151x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm
Maximum value of SAR (interpolated) = 0.0265 W/kg

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 2.196 V/m; Power Drift = -0.01 dB
Peak SAR (extrapolated) = 0.0350 W/kg
SAR(1 g) = 0.018 W/kg; SAR(10 g) = 0.00962 W/kg
Maximum value of SAR (measured) = 0.0229 W/kg



0 dB = 0.0229 W/kg = -16.40 dBW/kg

02_Bluetooth_BLE 1M 5.0_Front_0mm_Ch19

Communication System: UID 0, Bluetooth (0); Frequency: 2440 MHz; Duty Cycle: 1:1.162
Medium: HSL_2450 Medium parameters used: $f = 2440$ MHz; $\sigma = 1.815$ S/m; $\epsilon_r = 39.273$; $\rho = 1000$ kg/m³

Ambient Temperature : 23.3 °C; Liquid Temperature : 22.8 °C

DASY5 Configuration:

- Probe: EX3DV4 - SN3857; ConvF(7.71, 7.71, 7.71); Calibrated: 2022/12/14
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1279; Calibrated: 2023/6/7
- Phantom: SAM Twin Phantom; Type: SAM Twin; Serial: TP-1754
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7501)

Area Scan (61x151x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 0.142 W/kg

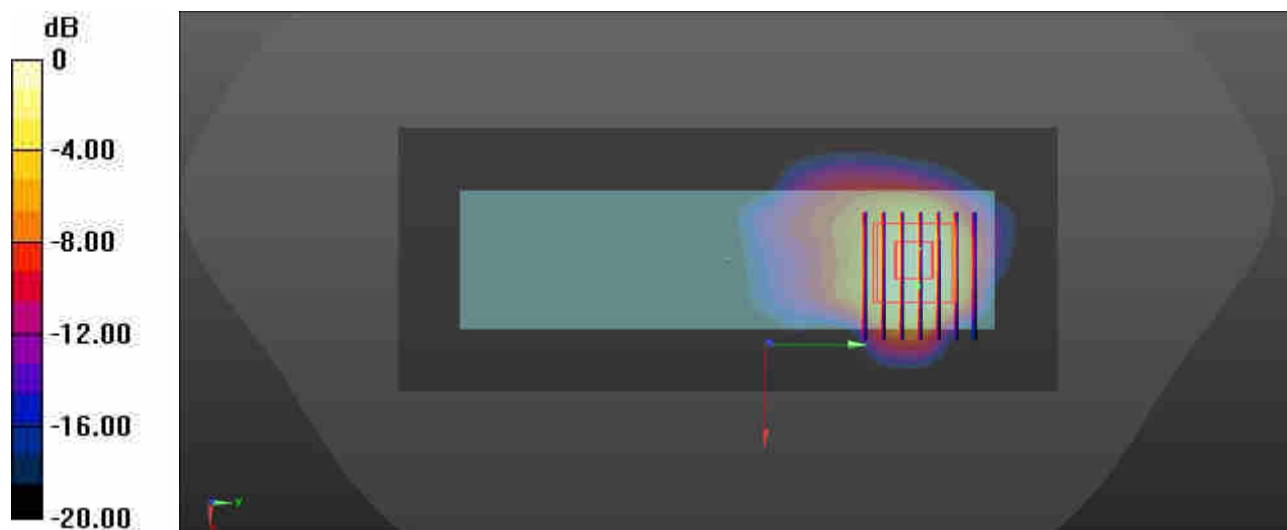
Zoom Scan (8x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 1.702 V/m; Power Drift = 0.13 dB

Peak SAR (extrapolated) = 0.173 W/kg

SAR(1 g) = 0.088 W/kg; SAR(10 g) = 0.042 W/kg

Maximum value of SAR (measured) = 0.114 W/kg



0 dB = 0.114 W/kg = -9.43 dBW/kg



Appendix C. DASYS Calibration Certificate

The DASYS calibration certificates are shown as follows.



Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **Sporton**
Kunshan City, China

Certificate No. **D2450V2-1040_Apr23**

CALIBRATION CERTIFICATE

Object **D2450V2 - SN:1040**

Calibration procedure(s) **QA CAL-05.v12
Calibration Procedure for SAR Validation Sources between 0.7-3 GHz**

Calibration date: **April 25, 2023**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP2	SN: 104778	30-Mar-23 (No. 217-03804/03805)	Mar-24
Power sensor NRP-Z91	SN: 103244	30-Mar-23 (No. 217-03804)	Mar-24
Power sensor NRP-Z91	SN: 103245	30-Mar-23 (No. 217-03805)	Mar-24
Reference 20 dB Attenuator	SN: BH9394 (20k)	30-Mar-23 (No. 217-03809)	Mar-24
Type-N mismatch combination	SN: 310982 / 06327	30-Mar-23 (No. 217-03810)	Mar-24
Reference Probe EX3DV4	SN: 7349	10-Jan-23 (No. EX3-7349_Jan23)	Jan-24
DAE4	SN: 601	19-Dec-22 (No. DAE4-601_Dec22)	Dec-23

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB39512475	30-Oct-14 (in house check Oct-22)	In house check: Oct-24
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-22)	In house check: Oct-24
Power sensor HP 8481A	SN: MY41093315	07-Oct-15 (in house check Oct-22)	In house check: Oct-24
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-22)	In house check: Oct-24
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-22)	In house check: Oct-24

Calibrated by: **Name** Michael Weber **Function** Laboratory Technician

Signature

Approved by: **Name** Sven Kühn **Technical Manager**

i.a.

Issued: April 26, 2023

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Glossary:

TSL	tissue simulating liquid
ConvF	sensitivity in TSL / NORM x,y,z
N/A	not applicable or not measured

Calibration is Performed According to the Following Standards:

- a) IEC/IEEE 62209-1528, "Measurement Procedure For The Assessment Of Specific Absorption Rate Of Human Exposure To Radio Frequency Fields From Hand-Held And Body-Worn Wireless Communication Devices - Part 1528: Human Models, Instrumentation And Procedures (Frequency Range of 4 MHz to 10 GHz)", October 2020.
- b) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- c) DASY System Handbook

Methods Applied and Interpretation of Parameters:

- *Measurement Conditions:* Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- *Antenna Parameters with TSL:* The source is mounted in a touch configuration below the center marking of the flat phantom.
- *Return Loss:* This parameter is measured with the source positioned under the liquid filled phantom (as described in the measurement condition clause). The Return Loss ensures low reflected power. No uncertainty required.
- *SAR measured:* SAR measured at the stated antenna input power.
- *SAR normalized:* SAR as measured, normalized to an input power of 1 W at the antenna connector.
- *SAR for nominal TSL parameters:* The measured TSL parameters are used to calculate the nominal SAR result.

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

Measurement Conditions

DASY system configuration, as far as not given on page 1.

DASY Version	DASY52	V52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	2450 MHz \pm 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 \pm 0.2) °C	37.7 \pm 6 %	1.86 mho/m \pm 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	13.5 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	52.7 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	6.24 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	24.6 W/kg \pm 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	53.1 Ω + 2.6 j Ω
Return Loss	- 28.2 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.153 ns
----------------------------------	----------

After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
-----------------	-------

DASY5 Validation Report for Head TSL

Date: 25.04.2023

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN: 1040

Communication System: UID 0 - CW; Frequency: 2450 MHz

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.86$ S/m; $\epsilon_r = 37.7$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

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

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(7.88, 7.88, 7.88) @ 2450 MHz; Calibrated: 10.01.2023
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 19.12.2022
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.4(1535); SEMCAD X 14.6.14(7501)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

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

Reference Value = 117.6 V/m; Power Drift = 0.03 dB

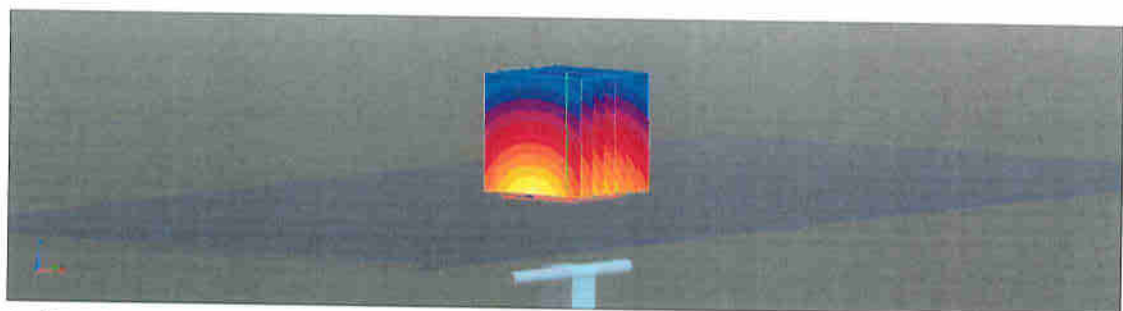
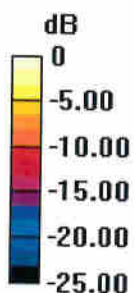
Peak SAR (extrapolated) = 26.7 W/kg

SAR(1 g) = 13.5 W/kg; SAR(10 g) = 6.24 W/kg

Smallest distance from peaks to all points 3 dB below = 9 mm

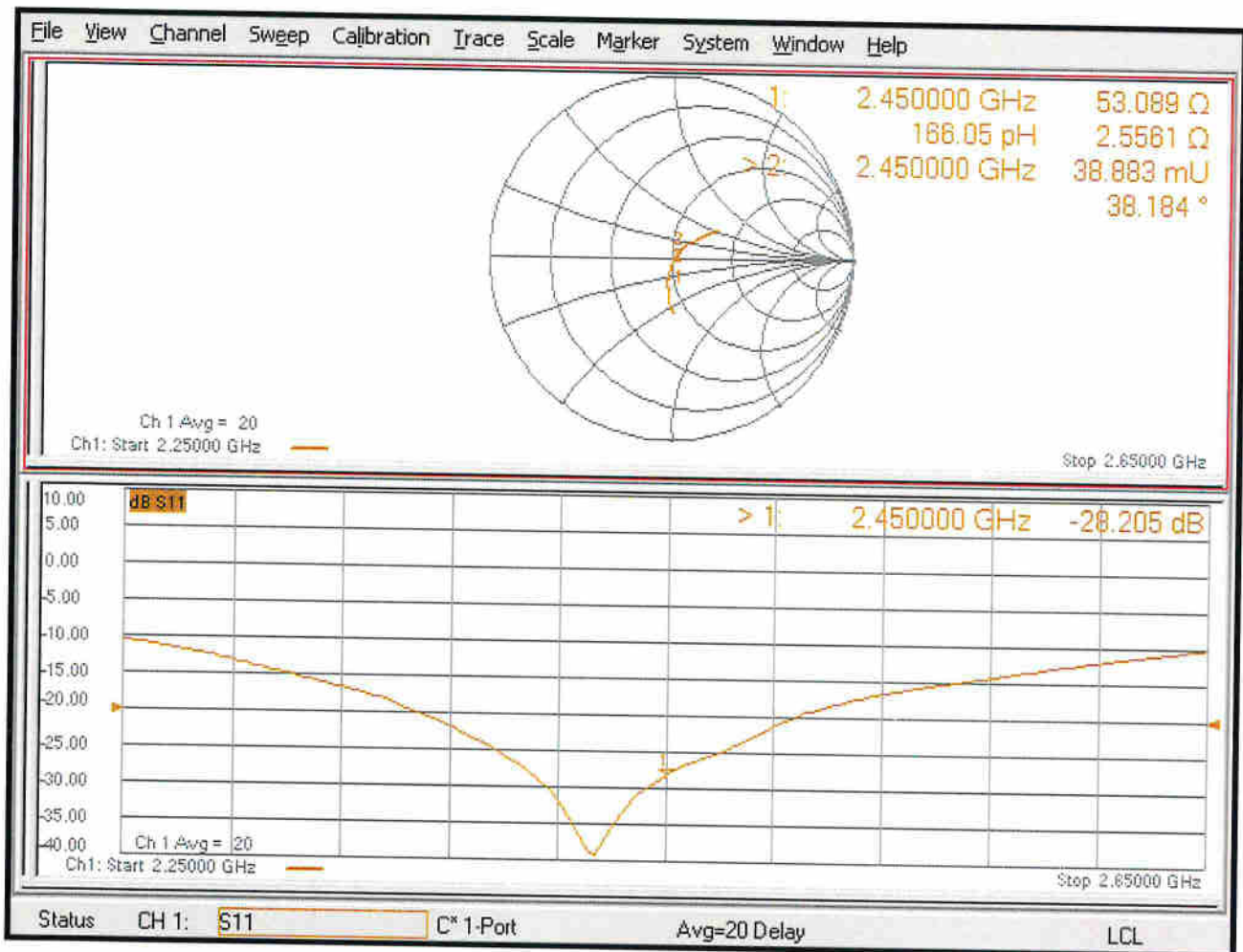
Ratio of SAR at M2 to SAR at M1 = 50.3%

Maximum value of SAR (measured) = 22.2 W/kg



0 dB = 22.2 W/kg = 13.46 dBW/kg

Impedance Measurement Plot for Head TSL



IMPORTANT NOTICE

USAGE OF THE DAE4

The DAE unit is a delicate, high precision instrument and requires careful treatment by the user. There are no serviceable parts inside the DAE. Special attention shall be given to the following points:

Battery Exchange: The battery cover of the DAE4 unit is fixed using a screw, over tightening the screw may cause the threads inside the DAE to wear out.

Shipping of the DAE: Before shipping the DAE to SPEAG for calibration, remove the batteries and pack the DAE in an antistatic bag. This antistatic bag shall then be packed into a larger box or container which protects the DAE from impacts during transportation. The package shall be marked to indicate that a fragile instrument is inside.

E-Stop Failures: Touch detection may be malfunctioning due to broken magnets in the E-stop. Rough handling of the E-stop may lead to damage of these magnets. Touch and collision errors are often caused by dust and dirt accumulated in the E-stop. To prevent E-stop failure, the customer shall always mount the probe to the DAE carefully and keep the DAE unit in a non-dusty environment if not used for measurements.

Repair: Minor repairs are performed at no extra cost during the annual calibration. However, SPEAG reserves the right to charge for any repair especially if rough unprofessional handling caused the defect.

DASY Configuration Files: Since the exact values of the DAE input resistances, as measured during the calibration procedure of a DAE unit, are not used by the DASY software, a nominal value of 200 MOhm is given in the corresponding configuration file.

Important Note:

Warranty and calibration is void if the DAE unit is disassembled partly or fully by the Customer.

Important Note:

Never attempt to grease or oil the E-stop assembly. Cleaning and readjusting of the E-stop assembly is allowed by certified SPEAG personnel only and is part of the annual calibration procedure.

Important Note:

To prevent damage of the DAE probe connector pins, use great care when installing the probe to the DAE. Carefully connect the probe with the connector notch oriented in the mating position. Avoid any rotational movement of the probe body versus the DAE while turning the locking nut of the connector. The same care shall be used when disconnecting the probe from the DAE.



Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **Sporton**
Kunshan City

Certificate No: **DAE4-1279_Jun23**

CALIBRATION CERTIFICATE

Object **DAE4 - SD 000 D04 BM - SN: 1279**

Calibration procedure(s) **QA CAL-06.v30
Calibration procedure for the data acquisition electronics (DAE)**

Calibration date: **June 07, 2023**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Keithley Multimeter Type 2001	SN: 0810278	29-Aug-22 (No:34389)	Aug-23
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Auto DAE Calibration Unit	SE UWS 053 AA 1001	27-Jan-23 (in house check)	In house check: Jan-24
Calibrator Box V2.1	SE UMS 006 AA 1002	27-Jan-23 (in house check)	In house check: Jan-24

Calibrated by: **Name** Adrian Gehring **Function** Laboratory Technician

Approved by: **Name** Sven Kühn **Technical Manager**

Signature

Issued: June 7, 2023

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.



Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Glossary

DAE data acquisition electronics
Connector angle information used in DASY system to align probe sensor X to the robot coordinate system.

Methods Applied and Interpretation of Parameters

- *DC Voltage Measurement:* Calibration Factor assessed for use in DASY system by comparison with a calibrated instrument traceable to national standards. The figure given corresponds to the full scale range of the voltmeter in the respective range.
- *Connector angle:* The angle of the connector is assessed measuring the angle mechanically by a tool inserted. Uncertainty is not required.
- The following parameters as documented in the Appendix contain technical information as a result from the performance test and require no uncertainty.
 - *DC Voltage Measurement Linearity:* Verification of the Linearity at +10% and -10% of the nominal calibration voltage. Influence of offset voltage is included in this measurement.
 - *Common mode sensitivity:* Influence of a positive or negative common mode voltage on the differential measurement.
 - *Channel separation:* Influence of a voltage on the neighbor channels not subject to an input voltage.
 - *AD Converter Values with inputs shorted:* Values on the internal AD converter corresponding to zero input voltage
 - *Input Offset Measurement:* Output voltage and statistical results over a large number of zero voltage measurements.
 - *Input Offset Current:* Typical value for information; Maximum channel input offset current, not considering the input resistance.
 - *Input resistance:* Typical value for information: DAE input resistance at the connector, during internal auto-zeroing and during measurement.
 - *Low Battery Alarm Voltage:* Typical value for information. Below this voltage, a battery alarm signal is generated.
 - *Power consumption:* Typical value for information. Supply currents in various operating modes.

DC Voltage Measurement

A/D - Converter Resolution nominal

High Range: 1LSB = 6.1 μ V , full range = -100...+300 mV

Low Range: 1LSB = 61nV , full range = -1.....+3mV

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

Calibration Factors	X	Y	Z
High Range	403.961 \pm 0.02% (k=2)	403.889 \pm 0.02% (k=2)	404.622 \pm 0.02% (k=2)
Low Range	3.97482 \pm 1.50% (k=2)	3.98010 \pm 1.50% (k=2)	3.99107 \pm 1.50% (k=2)

Connector Angle

Connector Angle to be used in DASY system	133.5 $^{\circ}$ \pm 1 $^{\circ}$
---	-------------------------------------

Appendix (Additional assessments outside the scope of SCS0108)

1. DC Voltage Linearity

High Range	Reading (μV)	Difference (μV)	Error (%)
Channel X + Input	200036.02	0.29	0.00
Channel X + Input	20007.84	1.27	0.01
Channel X - Input	-20004.57	1.22	-0.01
Channel Y + Input	200036.54	-2.76	-0.00
Channel Y + Input	20005.64	-0.84	-0.00
Channel Y - Input	-20008.18	-2.31	0.01
Channel Z + Input	200035.82	-0.65	-0.00
Channel Z + Input	20006.09	-0.33	-0.00
Channel Z - Input	-20009.04	-3.09	0.02

Low Range	Reading (μV)	Difference (μV)	Error (%)
Channel X + Input	2002.24	0.32	0.02
Channel X + Input	201.68	0.01	0.01
Channel X - Input	-197.78	0.41	-0.21
Channel Y + Input	2001.82	0.03	0.00
Channel Y + Input	200.63	-1.00	-0.50
Channel Y - Input	-198.99	-0.66	0.33
Channel Z + Input	2001.63	-0.14	-0.01
Channel Z + Input	200.94	-0.73	-0.36
Channel Z - Input	-198.44	-0.13	0.07

2. Common mode sensitivity

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	Common mode Input Voltage (mV)	High Range Average Reading (μV)	Low Range Average Reading (μV)
Channel X	200	-18.14	-19.90
	- 200	21.13	19.85
Channel Y	200	4.83	4.59
	- 200	-6.49	-6.84
Channel Z	200	7.97	7.38
	- 200	-8.07	-8.33

3. Channel separation

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	Input Voltage (mV)	Channel X (μV)	Channel Y (μV)	Channel Z (μV)
Channel X	200	-	2.70	-3.05
Channel Y	200	8.25	-	5.09
Channel Z	200	10.02	5.76	-

4. AD-Converter Values with inputs shorted

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

	High Range (LSB)	Low Range (LSB)
Channel X	15987	16658
Channel Y	15941	15569
Channel Z	15697	15886

5. Input Offset Measurement

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

Input 10M Ω

	Average (μ V)	min. Offset (μ V)	max. Offset (μ V)	Std. Deviation (μ V)
Channel X	0.56	-1.08	1.64	0.45
Channel Y	-1.87	-3.09	-0.62	0.44
Channel Z	-0.02	-1.29	1.04	0.46

6. Input Offset Current

Nominal Input circuitry offset current on all channels: <25fA

7. Input Resistance (Typical values for information)

	Zeroing (kOhm)	Measuring (MOhm)
Channel X	200	200
Channel Y	200	200
Channel Z	200	200

8. Low Battery Alarm Voltage (Typical values for information)

Typical values	Alarm Level (VDC)
Supply (+ Vcc)	+7.9
Supply (- Vcc)	-7.6

9. Power Consumption (Typical values for information)

Typical values	Switched off (mA)	Stand by (mA)	Transmitting (mA)
Supply (+ Vcc)	+0.01	+6	+14
Supply (- Vcc)	-0.01	-8	-9



Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **Sporton**

Certificate No **EX-3857_Dec22**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:3857**

Calibration procedure(s) **QA CAL-01.v10, QA CAL-12.v10, QA CAL-14.v7, QA CAL-23.v6,
QA CAL-25.v8
Calibration procedure for dosimetric E-field probes**

Calibration date **December 14, 2022**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3) °C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-22 (No. 217-03525/03524)	Apr-23
Power sensor NRP-Z91	SN: 103244	04-Apr-22 (No. 217-03524)	Apr-23
OCP DAK-3.5 (weighted)	SN: 1249	20-Oct-22 (OCP-DAK3.5-1249_Oct22)	Oct-23
OCP DAK-12	SN: 1016	20-Oct-22 (OCP-DAK12-1016_Oct22)	Oct-23
Reference 20 dB Attenuator	SN: CC2552 (20x)	04-Apr-22 (No. 217-03527)	Apr-23
DAE4	SN: 660	10-Oct-22 (No. DAE4-660_Oct22)	Oct-23
Reference Probe ES3DV2	SN: 3013	27-Dec-21 (No. ES3-3013_Dec21)	Dec-22

Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-22)	In house check: Jun-24
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-22)	In house check: Jun-24
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-22)	In house check: Jun-24
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-22)	In house check: Jun-24
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-22)	In house check: Oct-24

	Name	Function	Signature
Calibrated by	Jeffrey Katzman	Laboratory Technician	
Approved by	Sven Kühn	Technical Manager	

Issued: December 20, 2022

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

Calibration Laboratory of

Schmid & Partner
Engineering AG

Zeughausstrasse 43, 8004 Zurich, Switzerland



S Schweizerischer Kalibrierdienst
C Service suisse d'étalonnage
S Servizio svizzero di taratura
S Swiss Calibration Service

Accredited by the Swiss Accreditation Service (SAS)

The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: SCS 0108

Glossary

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConvF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization φ	φ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

- IEC/IEEE 62209-1528, "Measurement Procedure For The Assessment Of Specific Absorption Rate Of Human Exposure To Radio Frequency Fields From Hand-Held And Body-Worn Wireless Communication Devices – Part 1528: Human Models, Instrumentation And Procedures (Frequency Range of 4 MHz to 10 GHz)", October 2020.
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}**: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not affect the E²-field uncertainty inside TSL (see below ConvF).
- NORM(f)_{x,y,z} = NORM_{x,y,z} * frequency_response** (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP_{x,y,z}**: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal. DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; D_{x,y,z}; VR_{x,y,z}; A, B, C, D** are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle**: The angle is assessed using the information gained by determining the NORM_x (no uncertainty required).

Parameters of Probe: EX3DV4 - SN:3857

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc ($k = 2$)
Norm ($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	0.17	0.41	0.46	$\pm 10.1\%$
DCP (mV) ^B	93.8	101.4	100.6	$\pm 4.7\%$

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Max dev.	Max Unc ^E $k = 2$
0	CW	X	0.00	0.00	1.00	0.00	155.6	$\pm 3.0\%$	$\pm 4.7\%$
		Y	0.00	0.00	1.00		168.1		
		Z	0.00	0.00	1.00		162.9		
10352	Pulse Waveform (200Hz, 10%)	X	20.00	88.35	19.24	10.00	60.0	$\pm 2.6\%$	$\pm 9.6\%$
		Y	20.00	89.71	19.82		60.0		
		Z	20.00	87.86	18.59		60.0		
10353	Pulse Waveform (200Hz, 20%)	X	20.00	89.95	18.50	6.99	80.0	$\pm 1.6\%$	$\pm 9.6\%$
		Y	20.00	91.02	19.09		80.0		
		Z	20.00	89.10	18.09		80.0		
10354	Pulse Waveform (200Hz, 40%)	X	20.00	89.88	16.68	3.98	95.0	$\pm 1.3\%$	$\pm 9.6\%$
		Y	20.00	92.55	18.20		95.0		
		Z	20.00	92.13	18.23		95.0		
10355	Pulse Waveform (200Hz, 60%)	X	20.00	83.58	12.40	2.22	120.0	$\pm 1.4\%$	$\pm 9.6\%$
		Y	20.00	90.27	15.76		120.0		
		Z	20.00	94.92	18.26		120.0		
10387	QPSK Waveform, 1 MHz	X	1.68	66.07	15.07	1.00	150.0	$\pm 2.7\%$	$\pm 9.6\%$
		Y	1.46	64.67	13.78		150.0		
		Z	1.59	66.59	14.88		150.0		
10388	QPSK Waveform, 10 MHz	X	2.28	68.40	15.89	0.00	150.0	$\pm 0.9\%$	$\pm 9.6\%$
		Y	1.96	66.26	14.63		150.0		
		Z	2.13	67.95	15.66		150.0		
10396	64-QAM Waveform, 100 kHz	X	2.73	69.24	18.42	3.01	150.0	$\pm 0.7\%$	$\pm 9.6\%$
		Y	2.74	69.49	18.22		150.0		
		Z	2.86	71.20	19.17		150.0		
10399	64-QAM Waveform, 40 MHz	X	3.54	67.18	15.90	0.00	150.0	$\pm 2.5\%$	$\pm 9.6\%$
		Y	3.32	66.29	15.22		150.0		
		Z	3.43	67.10	15.73		150.0		
10414	WLAN CCDF, 64-QAM, 40 MHz	X	4.93	65.62	15.66	0.00	150.0	$\pm 4.4\%$	$\pm 9.6\%$
		Y	4.70	65.18	15.22		150.0		
		Z	4.75	65.67	15.52		150.0		

Note: For details on UID parameters see Appendix

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

^A The uncertainties of Norm X,Y,Z do not affect the E^2 -field uncertainty inside TSL (see Pages 5 and 6).

^B Linearization parameter uncertainty for maximum specified field strength.

^E Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

Parameters of Probe: EX3DV4 - SN:3857**Sensor Model Parameters**

	C1 fF	C2 fF	α V ⁻¹	T1 msV ⁻²	T2 msV ⁻¹	T3 ms	T4 V ⁻²	T5 V ⁻¹	T6
x	52.5	408.17	38.19	6.22	0.47	5.06	0.00	0.47	1.01
y	42.4	319.50	36.01	8.15	0.30	5.07	1.01	0.28	1.01
z	39.3	291.29	35.05	12.34	0.00	5.07	1.39	0.14	1.01

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle	161.8°
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm

Note: Measurement distance from surface can be increased to 3–4 mm for an *Area Scan* job.