




# TEST REPORT

## For SAR

Report No. .... : **CHTEW22070025** Report verification: 

Project No..... : **SHT2206109402EW**

FCC ID..... : **2A7J9-YANCELL**

Applicant's name ..... : **Importacion & Exportacion Yannick E.I.R.L**

Address..... : **Av. San Martin 268 los laureles castillo grande - Leoncio prado - Huanuco, Peru Country.**

Test item description ..... : **Mobile Phone**

Trade Mark ..... : **YANCELL**

Model/Type reference..... : **ROCHE**

Listed Model(s) ..... : **Charles, Mabel, Eduardo, Antonia, Flor, Isabel, Grover, Darwin, Cielo**

Standard ..... : **FCC 47 CFR Part2.1093**  
**IEEE Std C95.1: 1999 Edition**  
**IEEE Std 1528: 2013**

Date of receipt of test sample..... : **Jul. 05, 2022**

Date of testing..... : **Jul. 06, 2022- Jul. 07, 2022**

Date of issue..... : **Jul. 08, 2022**

Result..... : **PASS**

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*The test report merely correspond to the test sample.*

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## 1. Statement of Compliance

Maximum Reported SAR (W/kg @1g)				
Type	Test setting	WWLAN	BT	Simultaneous TX
Head	Cheek	0.388	0.006	0.394
Body-worn	Dist.= 10mm	0.356	0.007	0.363

Note:

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

## 2. Test Standards and Report version

### 2.1. Test Standards

The tests were performed according to following standards:

[FCC 47 Part 2.1093](#): Radiofrequency radiation exposure evaluation: portable devices.

[IEEE Std C95.1, 1999 Edition](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz

[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.

FCC published RF exposure KDB procedures:

[865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04](#): SAR Measurement Requirements for 100 MHz to 6 GHz

[865664 D02 RF Exposure Reporting v01r02](#): RF Exposure Compliance Reporting and Documentation Considerations

[447498 D04 Interim General RF Exposure Guidance v01](#): Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

[248227 D01 802.11 Wi-Fi SAR v02r02](#): SAR Measurement Procedures for 802.11 a/b/g Transmitters

[648474 D04 Handset SAR v01r03](#): SAR Evaluation Considerations for Wireless Handsets

[941225 D01 3G SAR Procedures v03r01](#): SAR Measurement Procedures for 3G Devices

[TCB workshop](#) April, 2019; Page 19, Tissue Simulating Liquids (TSL)

### 2.2. Report version

Revision No.	Date of issue	Description
N/A	2022-07-08	Original

### 3. Summary

#### 3.1. Client Information

Applicant:	Importacion & Exportacion Yannick E.I.R.L
Address:	Av. San Martin 268 los laureles castillo grande - Leoncio prado - Huanuco, Peru Country.
Manufacturer:	YANCELL Electronics Co., Ltd.
Address:	UNIT 1303, 13/F., GRAND CITY PLAZA, 1-17 SAI LAU KOK ROAD, TSUEN WAN, N.T., HONGKONG

#### 3.2. Product Description

Main unit	
Name of EUT:	Mobile Phone
Trade Mark:	YANCELL
Model No.:	ROCHE
Listed Model(s):	Charles, Mabel, Eduardo, Antonia, Flor, Isabel, Grover, Darwin, Cielo
Power supply:	DC 3.7V from battery
Hardware version:	V1.0
Software version:	V1.0
Device Dimension:	Length x Width x Thickness (mm): 140 x 65 x30
Device Category:	Portable
Product stage:	Production unit
RF Exposure Environment:	General Population/Uncontrolled
HTW test sample No.:	YPHT22061094005
Support SIM card quantity: #1	<input type="checkbox"/> Single card <input checked="" type="checkbox"/> Double card
Ancillary unit	
Battery information: #2	3.7Vdc, 3600mAh

Note:

#1: The Test EUT support two SIM card, so all the tests are performed at each SIM card mode, the datum recorded is the worst case for all the mode at SIM1 Card mode.

#2: The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power.

### 3.3. RF Specification Description

GSM			
Operation Band:	<input checked="" type="checkbox"/> GSM850	<input checked="" type="checkbox"/> PCS1900	
Support type:	<input checked="" type="checkbox"/> GSM	<input checked="" type="checkbox"/> GPRS	<input type="checkbox"/> EGPRS
Modulation type:	<input checked="" type="checkbox"/> GMSK	<input type="checkbox"/> 8PSK	
Power Class:	<input checked="" type="checkbox"/> GSM850: Class 4	<input checked="" type="checkbox"/> PCS1900: Class 1	
Device Class:	B		
GPRS Multi-Slot Class:	12		
EGPRS Multi-Slot Class:	12		
<i>Note:</i> This device doesn't support DTM (Dual Transfer Mode).			
WCDMA			
Operation Band:	<input checked="" type="checkbox"/> Band II	<input type="checkbox"/> Band IV	<input checked="" type="checkbox"/> Band V
Support type:	<input checked="" type="checkbox"/> UMTS Rel. 99 (Voice & Data)	<input checked="" type="checkbox"/> HSDPA	<input checked="" type="checkbox"/> HSUPA
Modulation type:	<input checked="" type="checkbox"/> QPSK		
Power Class:	Class 3		
Bluetooth			
Support type:	<input type="checkbox"/> BR	<input checked="" type="checkbox"/> EDR	<input type="checkbox"/> BLE-1Mbps <input type="checkbox"/> BLE-2Mbps
<i>Note:</i> This device support Bluetooth Tethering.			

### 3.4. Testing Laboratory Information

Laboratory Name	Shenzhen Huatongwei International Inspection Co., Ltd.	
Laboratory Location	1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China	
Connect information:	Tel: 86-755-26715499 E-mail: <a href="mailto:cs@szhtw.com.cn">cs@szhtw.com.cn</a> <a href="http://www.szhtw.com.cn">http://www.szhtw.com.cn</a>	
Qualifications	Type	Accreditation Number
	FCC	762235

### 3.5. Environmental conditions

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

Ambient temperature	18 °C to 25 °C
Ambient humidity	30%RH to 70%RH
Air Pressure	950-1050mbar

#### 4. Equipments Used during the Test

Used	Test Equipment	Manufacturer	Model No.	Serial No.	Cal. date (YY-MM-DD)	Due date (YY-MM-DD)
•	Data Acquisition Electronics DAEx	SPEAG	DAE4	1549	2022/04/12	2023/04/11
•	E-field Probe	SPEAG	EX3DV4	7494	2022/05/16	2023/05/15
•	Universal Radio Communication Tester	R&S	CMW500	137681	2022/05/12	2023/05/11
• Tissue-equivalent liquids Validation						
•	Dielectric Assessment Kit	SPEAG	DAK-3.5	1267	N/A	N/A
○	Dielectric Assessment Kit	SPEAG	DAK-12	1130	N/A	N/A
•	Network analyzer	Keysight	E5071C	MY46733048	2021/09/17	2022/09/16
• System Validation						
○	System Validation Antenna	SPEAG	CLA-150	4024	2021/01/25	2024/01/24
○	System Validation Dipole	SPEAG	D450V3	1102	2021/01/20	2024/01/19
○	System Validation Dipole	SPEAG	D750V3	1180	2021/01/22	2024/01/21
•	System Validation Dipole	SPEAG	D835V2	4d238	2021/01/22	2024/01/21
○	System Validation Dipole	SPEAG	D1750V2	1164	2021/01/22	2024/01/21
•	System Validation Dipole	SPEAG	D1900V2	5d226	2021/01/22	2024/01/21
•	System Validation Dipole	SPEAG	D2450V2	1009	2021/01/25	2024/01/24
○	System Validation Dipole	SPEAG	D2600V2	1150	2021/01/25	2024/01/24
○	System Validation Dipole	SPEAG	D5GHzV2	1273	2021/01/26	2024/01/25
•	Signal Generator	R&S	SMB100A	114360	2021/08/05	2022/08/04
•	Power Viewer for Windows	R&S	N/A	N/A	N/A	N/A
•	Power sensor	R&S	NRP18A	101010	2021/08/05	2022/08/04
•	Power sensor	R&S	NRP18A	101386	2022/05/12	2023/05/12
•	Power Amplifier	BONN	BLWA 0160-2M	1811887	2021/11/11	2022/11/10
•	Dual Directional Coupler	Mini-Circuits	ZHDC-10-62-S+	F975001814	2021/11/11	2022/11/10
•	Attenuator	Mini-Circuits	VAT-3W2+	1819	2021/11/11	2022/11/10
•	Attenuator	Mini-Circuits	VAT-10W2+	1741	2021/11/11	2022/11/10

Note:

1. The Probe, Dipole and DAE calibration reference to the Appendix E and F.
2. Referring to KDB865664 D01, the dipole calibration interval can be extended to 3 years with justification. The dipole are also not physically damaged or repaired during the interval.

## 5. **Measurement Uncertainty**

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, 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 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.



## 6. SAR Measurement System Configuration

### 6.1. SAR Measurement Set-up

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

A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).

A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronic (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.

A unit to operate the optical surface detector which is connected to the EOC.

The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.

The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows 2003.

DASY5 software and SEMCAD data evaluation software.

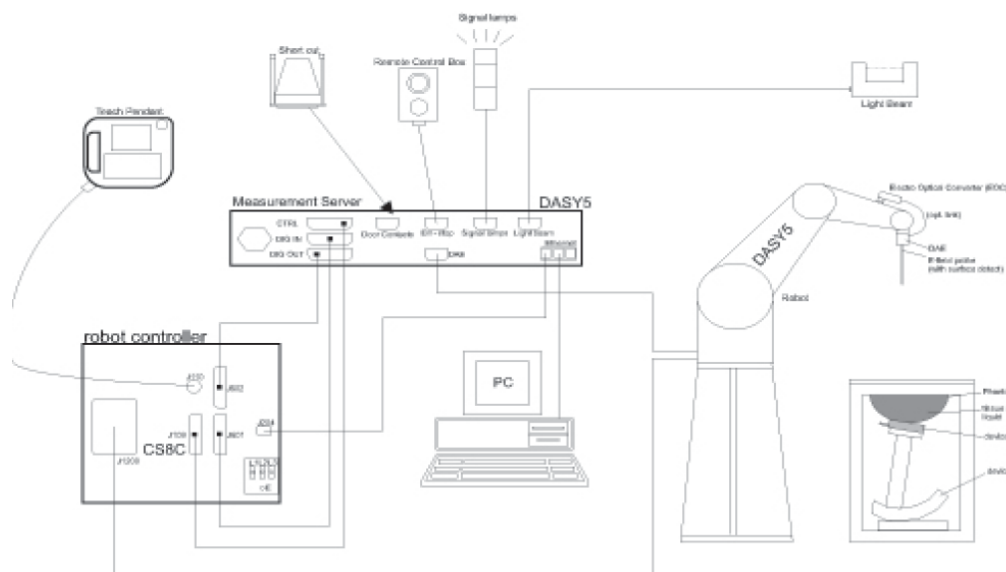
Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.

The generic twin phantom enabling the testing of left-hand and right-hand usage.

The device holder for handheld Mobile Phones.

Tissue simulating liquid mixed according to the given recipes.

System validation dipoles allowing to validate the proper functioning of the system.



## 6.2. DASY5 E-field Probe System

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation.

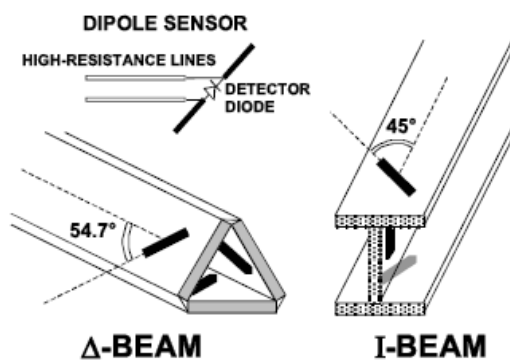
### ● Probe Specification

Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	4 MHz to 10 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 6 GHz)
Directivity	$\pm 0.3$ dB in HSL (rotation around probe axis) $\pm 0.5$ dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 $\mu$ W/g to > 100 W/kg; Linearity: $\pm 0.2$ dB
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.0 mm
Application	General dosimetry up to 6 GHz Dosimetry in strong gradient fields Compliance tests of Mobile Phones
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

### ◆ Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



### 6.3. Phantoms

The phantom used for all tests i.e. for both system checks and device testing, was the twin-headed "SAM Phantom", manufactured by SPEAG. The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region, where shell thickness increases to 6mm).

System checking was performed using the flat section, whilst Head SAR tests used the left and right head profile sections. Body SAR testing also used the flat section between the head profiles.



SAM-Twin Phantom

### 6.4. Device Holder

The device was placed in the device holder (illustrated below) that is supplied by SPEAG as an integral part of the DASY system.

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



Device holder supplied by SPEAG

## 7. SAR Test Procedure

### 7.1. Scanning Procedure

#### Step 1: 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. Measure the local SAR at a test point within 8 mm of the phantom inner surface that is closest to the DUT. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

#### Step 2: 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 locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) 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 Resolutions per FCC KDB Publication 865664 D01v04

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ 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: $\Delta x_{Area}$ , $\Delta y_{Area}$	$\leq 2$ 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.	

**Step 3: Zoom Scan**

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1g and 10g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose 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 g and 10 g and displays these values next to the job's label.

**Zoom Scan Resolutions per FCC KDB Publication 865664 D01v04**

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

Note:  $\delta$  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  $\leq 1.4 \text{ W/kg}$ ,  $\leq 8 \text{ mm}$ ,  $\leq 7 \text{ mm}$  and  $\leq 5 \text{ mm}$  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 drift measurement**

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1. The SAR drift shall be kept within  $\pm 5 \%$ .

## 7.2. Data Storage and Evaluation

### Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors),s together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “.DA4”. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [W/kg], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

### Data Evaluation

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	Sensitivity:	Normi, ai0, ai1, ai2
	Conversion factor:	ConvFi
	Diode compression point:	Dcpi
Device parameters:	Frequency:	f
	Crest factor:	cf
Media parameters:	Conductivity:	σ
	Density:	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY5 components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

Vi:	compensated signal of channel ( i = x, y, z )
Ui:	input signal of channel ( i = x, y, z )
cf:	crest factor of exciting field (DASY parameter)
dcp <sub>i</sub> :	diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

$$E - \text{fieldprobes : } E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

$$H - \text{fieldprobes : } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

Vi:	compensated signal of channel ( i = x, y, z )
Normi:	sensor sensitivity of channel ( i = x, y, z ), [mV/(V/m)²] for E-field Probes
ConvF:	sensitivity enhancement in solution
aij:	sensor sensitivity factors for H-field probes
f:	carrier frequency [GHz]
Ei:	electric field strength of channel i in V/m
Hi:	magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

SAR: local specific absorption rate in W/kg  
Etot: total field strength in V/m  
 $\sigma$ : conductivity in [mho/m] or [Siemens/m]  
 $\rho$ : equivalent tissue density in g/cm<sup>3</sup>

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.



## 8. Position of the wireless device in relation to the phantom

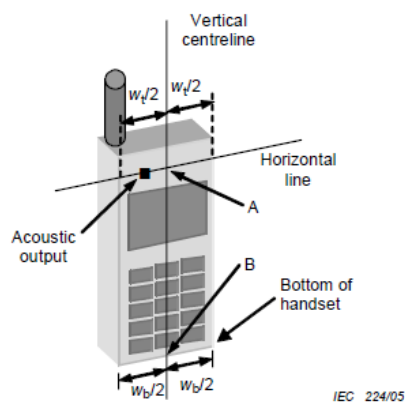
### 8.1. Head Position

The wireless device define two imaginary lines on the handset, the vertical centreline and the horizontal line, for the handset in vertical orientation as shown in Figures 5a and 5b.

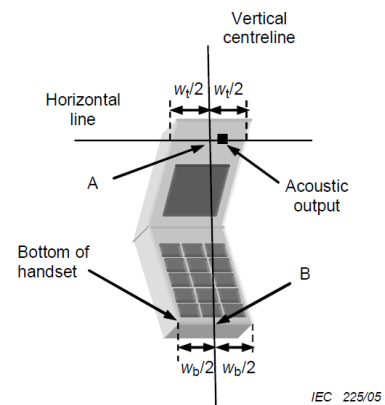
The vertical centreline passes through two points on the front side of the handset: the midpoint of the width  $W_t$  of the handset at the level of the acoustic output (point A in Figures 5a and 5b), and the midpoint of the width  $W_b$  of the bottom of the handset (point B).

The horizontal line is perpendicular to the vertical centreline and passes through the centre of the acoustic output (see Figures 5a and 5b). The two lines intersect at point A.

Note that for many handsets, point A coincides with the centre of the acoustic output. However, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centreline is not necessarily parallel to the front face of the handset (see Figure 5b), especially for clam-shell handsets, handsets with flip cover pieces, and other irregularly shaped handsets.



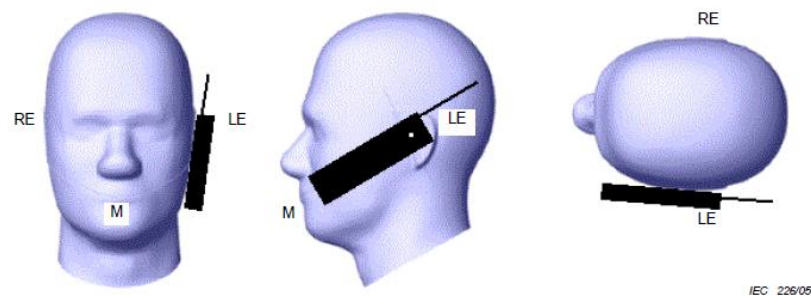
Figures 5a



Figures 5b

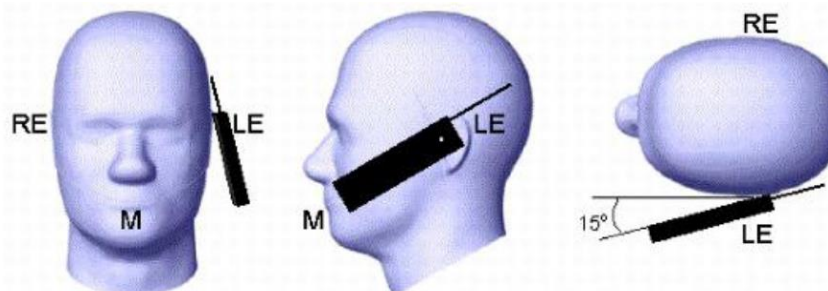
$W_t$	Width of the handset at the level of the acoustic
$W_b$	Width of the bottom of the handset
A	Midpoint of the width $w_t$ of the handset at the level of the acoustic output
B	Midpoint of the width $w_b$ of the bottom of the handset

### Cheek position



Picture 2 Cheek position of the wireless device on the left side of SAM

### Tilt position



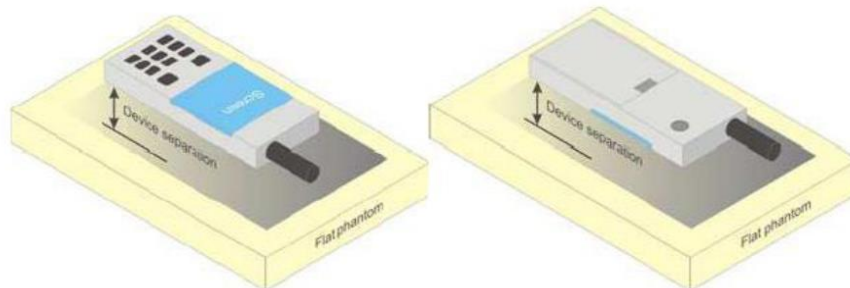
Picture 3 Tilt position of the wireless device on the left side of SAM



## 8.2. Body Position

Devices that support transmission while used with body-worn accessories must be tested for body-worn accessory SAR compliance, typically according to the smallest test separation distance required for the group of body-worn accessories with similar operating and exposure characteristics.

Devices that are designed to operate on the body of users using lanyards and straps or without requiring additional body-worn accessories must be tested for SAR compliance using a conservative minimum test separation distance  $\leq 5\text{mm}$  to support compliance.



Picture 4 Test positions for body-worn devices

## 9. Dielectric Property Measurements & System Check

### 9.1. Tissue Dielectric Parameters

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within  $\pm 2^\circ\text{C}$  of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3-4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

The dielectric constant ( $\epsilon_r$ ) and conductivity ( $\sigma$ ) of typical tissue-equivalent media recipes are expected to be within  $\pm 5\%$  of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for  $\epsilon_r$  and  $\sigma$  may be relaxed to  $\pm 10\%$ . This is limited to frequencies  $\leq 3$  GHz.

#### Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Tissue dielectric parameters for Head and Body				
Target Frequency (MHz)	Head		Body	
	$\epsilon_r$	$\sigma(\text{S/m})$	$\epsilon_r$	$\sigma(\text{S/m})$
835	41.5	0.90	55.2	0.97
1800-2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95

#### Measurement Results:

Dielectric performance of Head tissue simulating liquid									
Frequency (MHz)	$\epsilon_r$		$\sigma(\text{S/m})$		Delta ( $\epsilon_r$ )	Delta ( $\sigma$ )	Limit	Temp ( $^\circ\text{C}$ )	Date
	Target	Measured	Target	Measured					
835	41.50	40.68	0.900	0.912	-1.98%	1.33%	$\pm 5\%$	22.4	2022/7/7
1900	40.00	39.28	1.400	1.376	-1.80%	-1.71%	$\pm 5\%$	22.4	2022/7/7
2450	39.20	38.34	1.800	1.778	-2.19%	-1.22%	$\pm 5\%$	22.4	2022/7/6



**Measurement Results:**

Head											
Frequency (MHz)	1g SAR			10g SAR			Delta (1g)	Delta (10g)	Limit	Temp (°C)	Date
	Target 1W	Normalize to 1W	Measured 250mW	Target 1W	Normalize to 1W	Measured 250mW					
835	9.39	9.92	2.48	6.14	6.56	1.64	5.64%	6.84%	±10%	22.2	2022/7/7
1750	36.40	36.76	9.19	19.20	19.92	4.98	0.99%	3.75%	±10%	22.2	2022/7/7
2450	52.00	53.20	13.30	23.90	25.20	6.30	2.31%	5.44%	±10%	22.2	2022/7/6

*Note:*

*The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within ±10% of the manufacturer calibrated dipole SAR target.*

**Plots of System Performance Check****SystemPerformanceCheck-Head 835MHz**

Communication System: UID 0, CW (0); Frequency: 835 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 835 \text{ MHz}$ ;  $\sigma = 0.912 \text{ S/m}$ ;  $\epsilon_r = 40.682$ ;  $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Ambient Temperature:  $22.4^\circ\text{C}$ ; Liquid Temperature:  $22.2^\circ\text{C}$ ;

DASY Configuration:

- Probe: EX3DV4 - SN7494; ConvF(10.3, 10.3, 10.3) @ 835 MHz; Calibrated: 5/16/2022
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1549; Calibrated: 4/12/2022
- Phantom: Twin-SAM V8.0 ; Type: QD 000 P41 AA; Serial: 1974
- DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

**Head/d=15mm, Pin=250mW/Area Scan (41x101x1):** Interpolated grid:  $dx=1.500 \text{ mm}$ ,  $dy=1.500 \text{ mm}$

Maximum value of SAR (interpolated) =  $2.88 \text{ W/kg}$

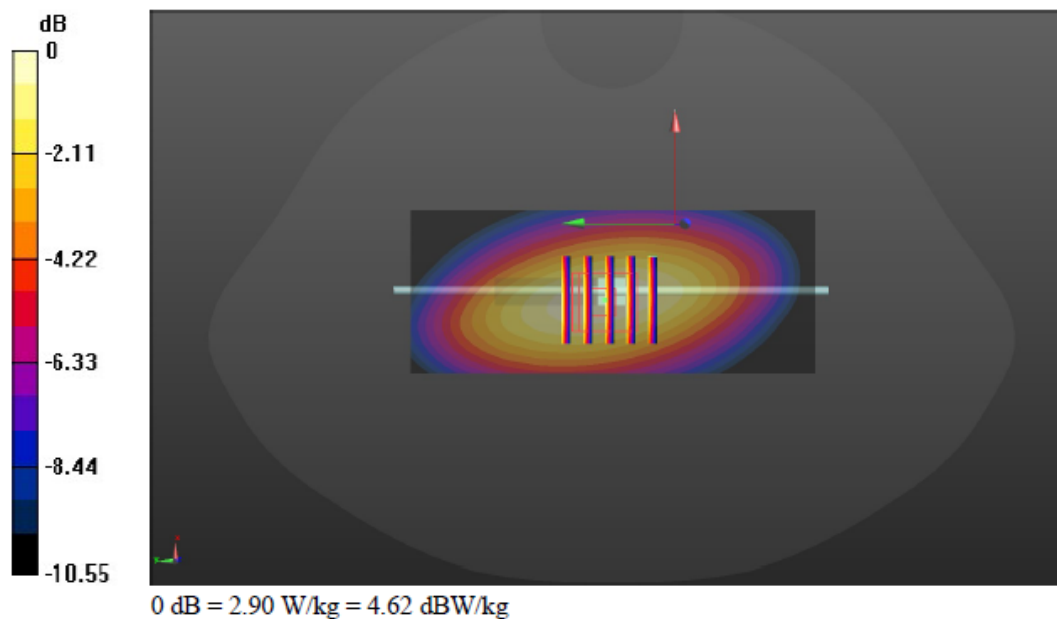
**Head/d=15mm, Pin=250mW/Zoom Scan (5x5x7)/Cube 0:** Measurement grid:  $dx=8\text{mm}$ ,  $dy=8\text{mm}$ ,  $dz=5\text{mm}$

Reference Value =  $56.21 \text{ V/m}$ ; Power Drift =  $-0.05 \text{ dB}$

Peak SAR (extrapolated) =  $3.67 \text{ W/kg}$

SAR(1 g) =  $2.48 \text{ W/kg}$ ; SAR(10 g) =  $1.64 \text{ W/kg}$

Maximum value of SAR (measured) =  $2.90 \text{ W/kg}$



**SystemPerformanceCheck-Head 1900MHz**

Communication System: UID 0, CW (0); Frequency: 1900 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 1900$  MHz;  $\sigma = 1.376$  S/m;  $\epsilon_r = 39.278$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient Temperature: 22.4°C; Liquid Temperature: 22.2°C;

DASY Configuration:

- Probe: EX3DV4 - SN7494; ConvF(8.45, 8.45, 8.45) @ 1900 MHz; Calibrated: 5/16/2022
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1549; Calibrated: 4/12/2022
- Phantom: Twin-SAM V8.0 ; Type: QD 000 P41 AA; Serial: 1974
- DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

**Head/d=10mm,Pin=250mW /Area Scan (41x61x1):** Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 13.4 W/kg

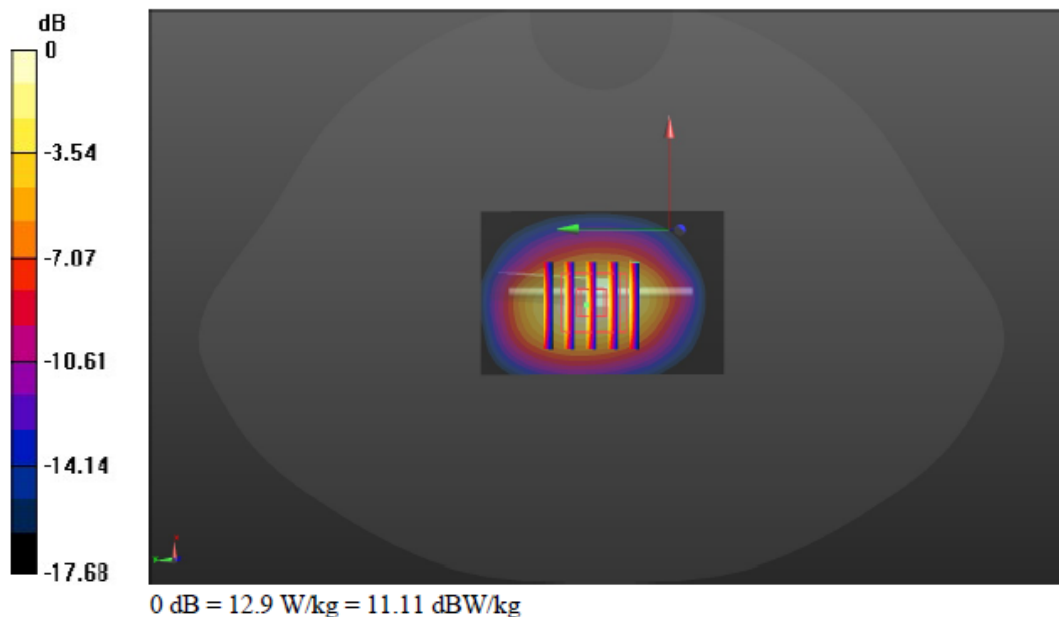
**Head/d=10mm,Pin=250mW /Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 92.64 V/m; Power Drift = -0.03 dB

Peak SAR (extrapolated) = 18.4 W/kg

SAR(1 g) = 10.2 W/kg; SAR(10 g) = 5.41 W/kg

Maximum value of SAR (measured) = 12.9 W/kg



**SystemPerformanceCheck-Head 2450MHz**

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

Medium parameters used (interpolated):  $f = 2450$  MHz;  $\sigma = 1.778$  S/m;  $\epsilon_r = 38.345$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient Temperature: 22.4°C; Liquid Temperature: 22.2°C;

DASY Configuration:

- Probe: EX3DV4 - SN7494; ConvF(7.9, 7.9, 7.9) @ 2450 MHz; Calibrated: 5/16/2022
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1549; Calibrated: 4/12/2022
- Phantom: Twin-SAM V8.0 ; Type: QD 000 P41 AA; Serial: 1974
- DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

**Head/d=10mm, Pin=250mW/Area Scan (41x61x1):** Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 18.3 W/kg

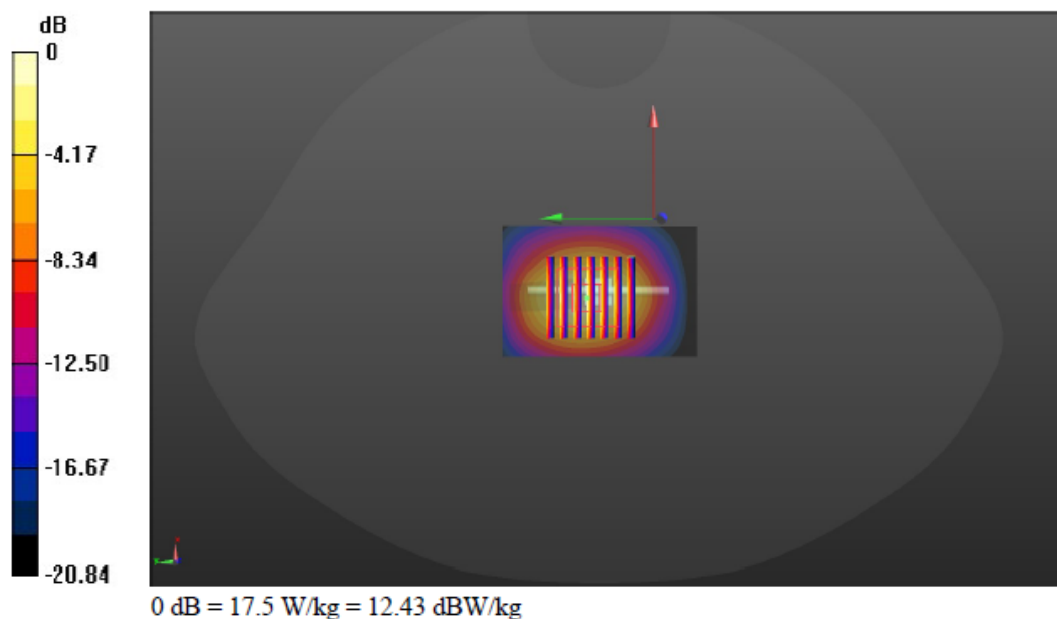
**Head/d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 94.68 V/m; Power Drift = -0.04 dB

Peak SAR (extrapolated) = 27.1 W/kg

SAR(1 g) = 13.3 W/kg; SAR(10 g) = 6.3 W/kg

Maximum value of SAR (measured) = 17.5 W/kg



## 10. SAR Exposure Limits

SAR assessments have been made in line with the requirements of FCC 47 CFR § 2.1093.

Type Exposure	Limit (W/kg)	
	General Population/ Uncontrolled Exposure Environment	Occupational/ Controlled Exposure Environment
Spatial Average SAR (whole body)	0.08	0.4
Spatial Peak SAR (1g cube tissue for head and trunk)	1.6	8.0
Spatial Peak SAR (10g for limb)	4.0	20.0

*Note:*

1. *Population/Uncontrolled Environments: are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.*
2. *Occupational/Controlled Environments: are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).*



## 11. Conducted Power Measurement Results and Tune-up

Please refer to Appendix Report

Note:

### GSM

1. Per KDB 447498 D04, the maximum output power channel is used for SAR testing and further SAR test reduction.
2. Per KDB 941225 D01, considering the possibility of e.g. 3rd party VoIP operation for Head and Body-worn SAR test reduction for GSM and GPRS modes is determined by the source-base time-averaged output power including tune-up tolerance. The mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions. For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested.
3. Per KDB941225 D01, for hotspot SAR test reduction for GPRS modes is determined by the source-based time-averaged output power including tune-up tolerance, For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested.

### WCDMA

1. The following tests were conducted according to the test requirements outlines in 3GPP TS34.121 specification.
2. The procedures in KDB 941225 D01 are applied for 3GPP Rel. 6 HSPA to configure the device in the required sub-test mode to determine SAR test exclusion

A summary of these settings are illustrated below:

### HSDPA Setup Configuration:

- a) The EUT was connected to base station RS CMU200 referred to the setup configuration
- b) The RF path losses were compensated into the measurements
- c) A call was established between EUT and base station with following setting:
  - i. Set Gain Factors ( $\beta_c$  and  $\beta_d$ ) and parameters were set according to each specific sub-test in the following table, C10.1.4, Quoted from the TS 34.121
  - ii. Set RMC 12.2Kbps + HSDPA mode
  - iii. Set Cell Power=-86dBm
  - iv. Set HS-DSCH Configuration Type to FRC (H-set 1, QPSK)
  - v. Select HSDPA uplink parameters
  - vi. Set Delta ACK, Delta NACK and Delta CQI=8
  - vii. Set Ack-Nack repetition Factor to 3
  - viii. Set CQI Feedback Cycle (K) to 4ms
  - ix. Set CQI repetition factor to 2
  - x. Power ctrl mode= all up bits
- d) The transmitter maximum output power was recorded.

**Table C.10.1.4:  $\beta$  values for transmitter characteristics tests with HS-DPCCH**

Sub-test	$\beta_c$	$\beta_d$	$\beta_d$ (SF)	$\beta_c/\beta_d$	$\beta_{HS}$ (Note 1, Note 2)	CM (dB) (Note 3)	MPR (dB) (Note 3)
1	2/15	15/15	64	2/15	4/15	0.0	0.0
2	12/15 (Note 4)	15/15 (Note 4)	64	12/15 (Note 4)	24/15	1.0	0.0
3	15/15	8/15	64	15/8	30/15	1.5	0.5
4	15/15	4/15	64	15/4	30/15	1.5	0.5

Note 1:  $\Delta_{ACK}$ ,  $\Delta_{NACK}$  and  $\Delta_{CQI} = 30/15$  with  $\beta_{HS} = 30/15 * \beta_c$ .

Note 2: For the HS-DPCCH power mask requirement test in clause 5.2C, 5.7A, and the Error Vector Magnitude (EVM) with HS-DPCCH test in clause 5.13.1A, and HSDPA EVM with phase discontinuity in clause 5.13.1AA,  $\Delta_{ACK}$  and  $\Delta_{NACK} = 30/15$  with  $\beta_{HS} = 30/15 * \beta_c$ , and  $\Delta_{CQI} = 24/15$  with  $\beta_{HS} = 24/15 * \beta_c$ .

Note 3: CM = 1 for  $\beta_c/\beta_d = 12/15$ ,  $\beta_{HS}/\beta_c = 24/15$ . For all other combinations of DPDCCH, DPCCH and HS-DPCCH the MPR is based on the relative CM difference. This is applicable for only UEs that support HSDPA in release 6 and later releases.

Note 4: For subtest 2 the  $\beta_c/\beta_d$  ratio of 12/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to  $\beta_c = 11/15$  and  $\beta_d = 15/15$ .

### Setup Configuration

**HSUPA Setup Configuration:**

- a) The EUT was connected to base station RS CMU200 referred to the setup configuration
- b) The RF path losses were compensated into the measurements
- c) A call was established between EUT and base station with following setting:
- Call configs = 5.2b, 5.9b, 5.10b, and 5.13.2B with QPSK
  - Set Gain Factors ( $\beta_c$  and  $\beta_d$ ) and parameters (AG index) were set according to each specific sub-test in the following table, C11.1.3, Quoted from the TS 34.121
  - Set Cell Power=-86dBm
  - Set channel type= 12.2Kbps + HSPA mode
  - Set UE Target power
  - Set Ctrl mode=Alternating bits
  - Set and observe the E-TFCI
  - Confirm that E-TFCI is equal the target E-TFCI of 75 for Sub-test 1, and other subtest's E-TFCI
- d) The transmitter maximum output power was recorded.

**Table C.11.1.3:  $\beta$  values for transmitter characteristics tests with HS-DPCCH and E-DCH**

Sub-test	$\beta_c$	$\beta_d$	$\beta_d$ (SF)	$\beta_c/\beta_d$	$\beta_{HS}$ (Note 1)	$\beta_{ec}$	$\beta_{ed}$ (Note 5)	$\beta_{ed}$ (SF)	$\beta_{ed}$ (Codes)	CM (dB) (Note 2)	MPR (dB) (Note 2)	AG Index (Note 6)	E-TFCI
1	11/15 (Note 3)	15/15 (Note 3)	64	11/15 (Note 3)	22/15	209/25	1309/225	4	1	1.0	0.0	20	75
2	6/15	15/15	64	6/15	12/15	12/15	94/75	4	1	3.0	2.0	12	67
3	15/15	9/15	64	15/9	30/15	30/15	$\beta_{ed1}$ : 47/15 $\beta_{ed2}$ : 47/15	4	2	2.0	1.0	15	92
4	2/15	15/15	64	2/15	4/15	2/15	56/75	4	1	3.0	2.0	17	71
5	15/15 (Note 4)	15/15 (Note 4)	64	15/15 (Note 4)	30/15	24/15	134/15	4	1	1.0	0.0	21	81

Note 1:  $\Delta_{ACK}$ ,  $\Delta_{NACK}$  and  $\Delta_{CQI} = 30/15$  with  $\beta_{hs} = 30/15 * \beta_c$ .

Note 2: CM = 1 for  $\beta_c/\beta_d = 12/15$ ,  $\beta_{hs}/\beta_c = 24/15$ . For all other combinations of DPDCH, DPCCH, HS-DPCCH, E-DPDCH and E-DPCCH the MPR is based on the relative CM difference.

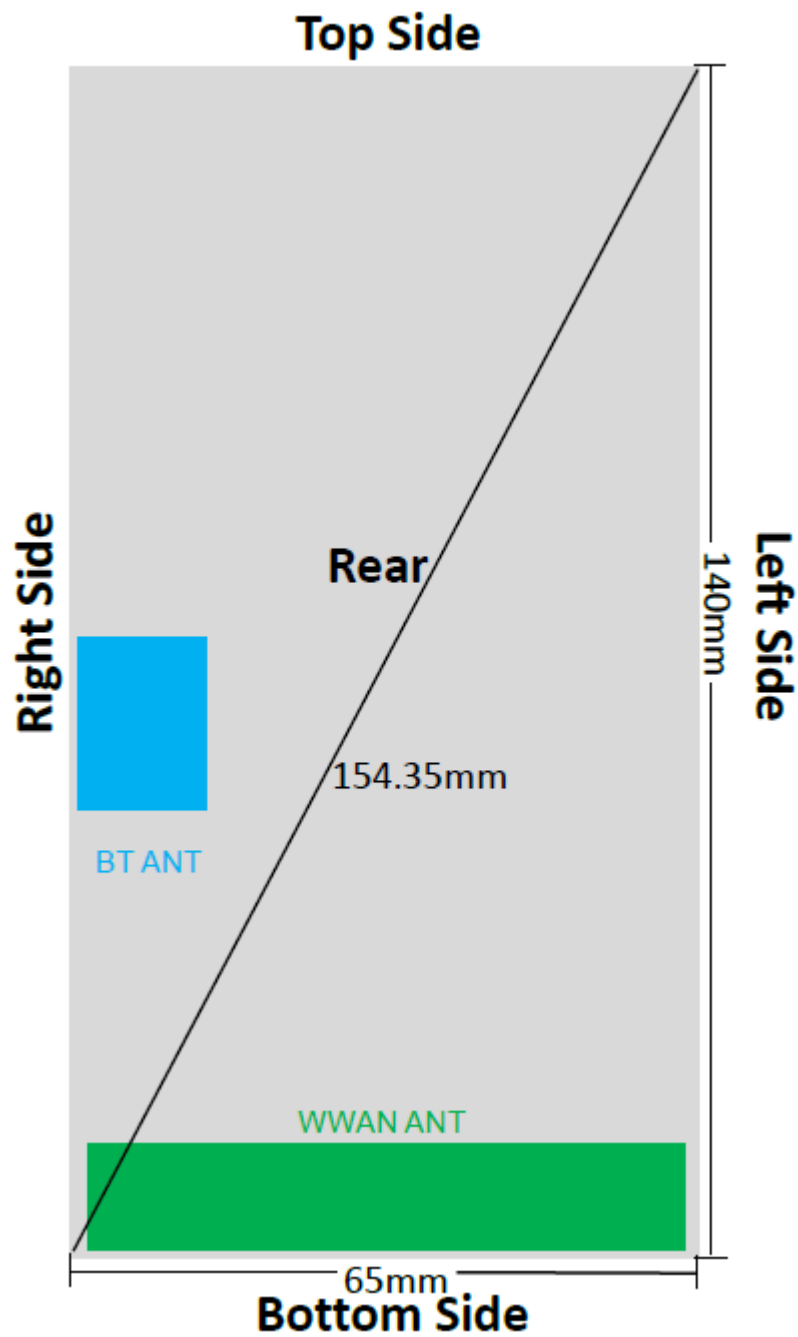
Note 3: For subtest 1 the  $\beta_c/\beta_d$  ratio of 11/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to  $\beta_c = 10/15$  and  $\beta_d = 15/15$ .

Note 4: For subtest 5 the  $\beta_c/\beta_d$  ratio of 15/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to  $\beta_c = 14/15$  and  $\beta_d = 15/15$ .

Note 5: In case of testing by UE using E-DPDCH Physical Layer category 1, Sub-test 3 is omitted according to TS25.306 Table 5.1g.

Note 6:  $\beta_{ed}$  can not be set directly, it is set by Absolute Grant Value.

## 12. Antenna Location



## 13. Measured and Reported SAR Results

### Measurement Results:

Please refer to Appendix Report

### Measurement data plots:

Please refer to Appendix D

Note:

#### **SAR Test Reduction criteria are as follows:**

- Reported SAR(W/kg) for WWAN = Measured SAR \* Tune-up Scaling Factor
- Reported SAR(W/kg) for Wi-Fi and Bluetooth = Measured SAR \* Tune-up scaling factor \* Duty Cycle scaling factor
- Duty Cycle scaling factor = 1 / Duty cycle (%)

#### **KDB 447498 D04 Interim General RF Exposure Guidance v01:**

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:

- $\leq 0.8$  W/kg or  $2.0$  W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
- $\leq 0.6$  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
- $\leq 0.4$  W/kg or  $1.0$  W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz

#### **KDB 648474 D04 Handset SAR:**

With headset attached, when the reported SAR for 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. Additional 1-g SAR testing at 5 mm is not required when hotspot mode 10-g extremity SAR is not required for the surfaces and edges; since all 1-g reported SAR  $< 1.2$  W/kg.

#### **KDB 941225 D01 SAR test for 3G SAR Test Reduction Procedure:**

When the maximum output power and tune-up tolerance specified for production units in a secondary mode is  $\leq \frac{1}{4}$  dB higher than the primary mode or when the highest reported SAR of the primary mode is scaled by the ratio of specified maximum output power and tune-up tolerance of secondary to primary mode and the adjusted SAR is  $\leq 1.2$  W/kg, SAR measurement is not required for the secondary mode.

#### **GSM Guidance**

SAR test reduction for GPRS and EDGE modes is determined by the source-based time-averaged output power specified for production units, including tune-up tolerance. The data mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions. For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested. Please refer to section 9. for GSM power verification.

SAR is not required for EDGE (8PSK) mode because the maximum output power and tune-up limit is  $\leq 1/4$  dB higher than GPRS/EDGE (GMSK) or the adjusted SAR of the highest reported SAR of GPRS/EDGE (GMSK) is  $\leq 1.2$  W/kg.

#### **W-CDMA Guidance**

SAR for next to the ear head exposure is measured using a 12.2 kbps RMC with TPC bits configured to all "1's". The 3G SAR test reduction procedure is applied to AMR configurations with 12.2 kbps RMC (Head) and other spreading codes and multiple DPDCHn configurations supported by the handset with 12.2 kbps RMC (Body-Worn Accessory) as the primary mode.

Per KDB 941225 D01 RMC12.2Kbps setting is used to evaluate SAR. If the maximum output power and Tune-up tolerance specified for production units in HSDPA/HSUPA is  $\leq 1/4$  dB higher than RMC 12.2Kbps or when the highest reported SAR of the RMC12.2Kbps is scaled by the ratio of specified maximum output power and tune-up tolerance of HSDPA / HSUPA to RMC 12.2Kbps and the adjusted SAR is  $\leq 1.2$  W/kg, SAR measurement is not required for HSDPA / HSUPA.

**KDB 248227 D01 SAR meas for 802.11:**

When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

- $\leq 0.4$  W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- $> 0.4$  W/kg, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is  $\leq 0.8$  W/kg or all required test positions are tested.
  - For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
  - When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is  $> 0.8$  W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required test channels are considered.
  - The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is  $\leq 1.2$  W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is  $\leq 1.2$  W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

To determine the initial test position, Area Scans were performed to determine the position with the Maximum Value of SAR (measured). The position that produced the highest Maximum Value of SAR is considered the worst case position; thus used as the initial test position.

## 14. Simultaneous Transmission analysis

No.	Simultaneous Transmission Configurations	Head	Body-worn	Note
1	GSM(voice) + Bluetooth (data)	Yes	Yes	
2	WCDMA(voice) + Bluetooth (data)	Yes	Yes	
3	GPRS (data) + Bluetooth (data)	Yes	Yes	
4	WCDMA (data) + Bluetooth (data)	Yes	Yes	

General note:

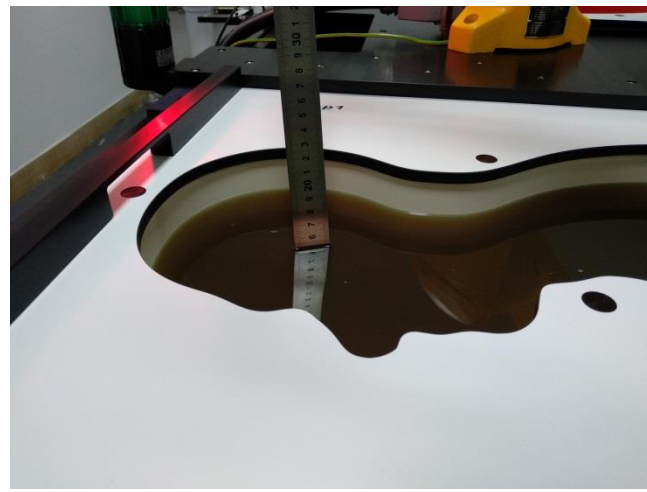
1. EUT will choose either GSM or WCDMA according to the network signal condition; therefore, they will not operate simultaneously at any moment.
2. The reported SAR summation is calculated based on the same configuration and test position

### **Simultaneous Transmission data:**

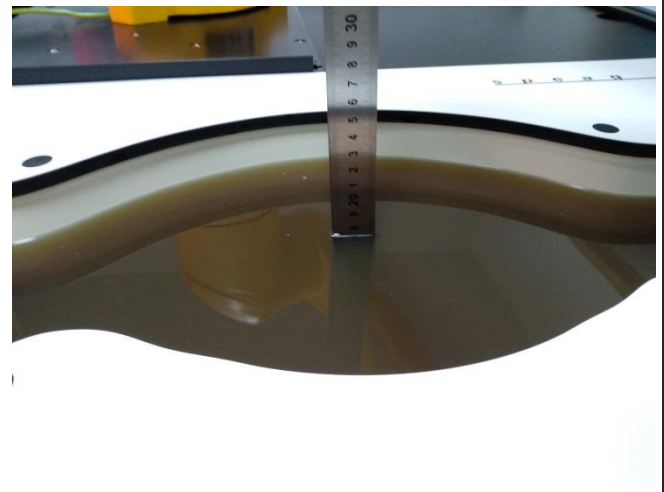
Please refer to Appendix Report



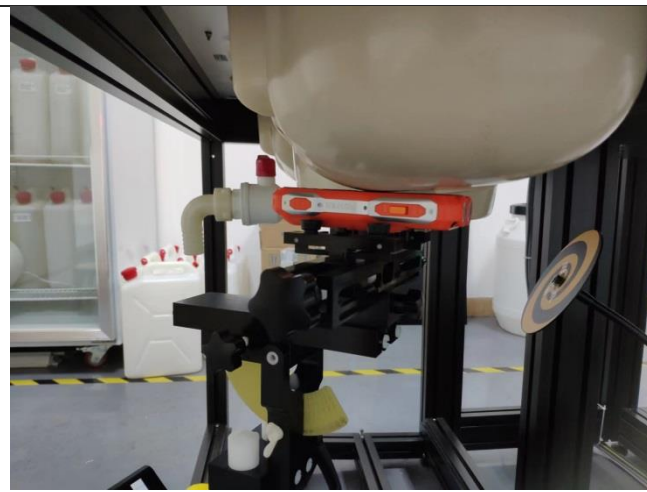
## 15. Test Setup Photos



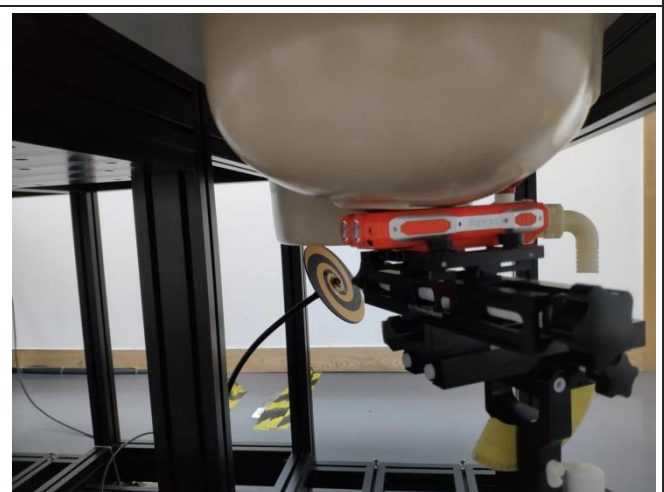
Liquid depth in the Head phantom



Liquid depth in the Body phantom



Left Head Touch



Right Head Touch



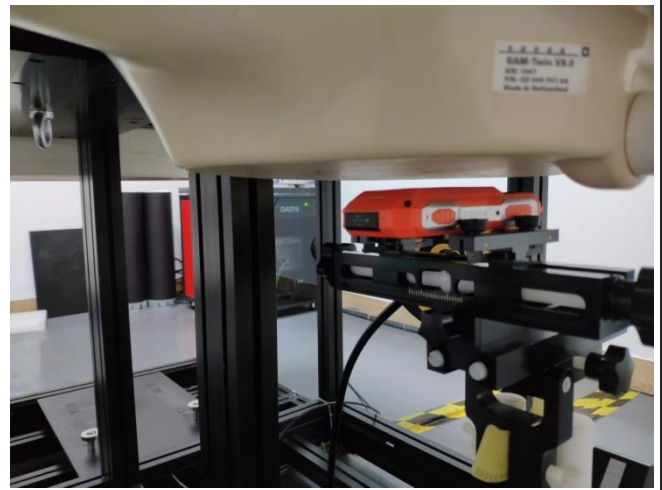
Left Head Tilt (15°)



Right Head Tilt (15°)



Body-worn Front (10mm)



Body-worn Rear(10mm)



## 16. External and Internal Photos of the EUT

