TEST REPORT

Report No. .... :	**CHTEW20040030**	Report verificaiton:
Project No. .... :	**SHT2003039603EW**	
FCC ID .... :	**2AAA6-S219T**	
Applicant's name .... :	**SENWA MEXICO,S.A.DE C.V**	
Address...:	CARRETERA MEXICO-TOLUCA No. 5324, INT. PLANTA BAJA COL. EL YAQUI,CUAJIMALPA DE MORELOS	
Manufacturer.......................................:	SENWA GLOBAL INTERNATIONAL SA DE CV	
Address...:	Rm.1218 Block A Chuangxin Building No.198 Daxin RD.Nanshan District ShenZhen	
Test item description .... :	**Mobile phone**	
Trade Mark ....:	SENWA	
Model/Type reference.......................:	S219T	
Listed Model(s) ....:	-	
Standard .... :	**FCC 47 CFR Part2.1093** **IEEE Std C95.1, 1999 Edition** **IEEE 1528: 2013**	
Date of receipt of test sample……….:	Mar.19, 2020	
Date of testing…………………………...:	Mar.19, 2020- Apr.07, 2020	
Date of issue…………………………….:	Apr.07, 2020	
Result................. …………………...:	**PASS**	

Compiled by (position+printedname+signature)...:	File administrators: Fanghui Zhu	Fanghui Zhu
Supervised by (position+printedname+signature)...:	Test Engineer: Xiaodong Zhao	Xiaodong Zhao
Approved by (position+printedname+signature)...:	Manager: Hans Hu	Hans Hu

Testing Laboratory Name .... :	**Shenzhen Huatongwei International Inspection Co., Ltd**
Address...:	1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China

The test report merely correspond to the test sample.

Contents

1 . Test Standards and Report version

1.1. 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 D01 General RF Exposure Guidance v06: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies
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)

1.2. Report version

Revision No.	Date of issue	Description
N/A	2020-04-07	Original

2. Summary

2.1. Client Information

Applicant:	SENWA MEXICO,S.A.DE C.V
Address:	CARRETERA MEXICO-TOLUCA No. 5324, INT. PLANTA BAJA COL. EL YAQUI,CUAJIMALPA DE MORELOS
Manufacturer:	SENWA GLOBAL INTERNATIONAL SA DE CV
Address:	Rm.1218 Block A Chuangxin Building No.198 Daxin RD.Nanshan District ShenZhen

2.2. Product Description

Name of EUT:	Mobile phone	
Trade Mark:	SENWA	
Model No.:	S219T	
Listed Model(s):	-	
Power supply:	DC 3.7V	
Device Category:	Portable	
Product stage:	Production unit	
RF Exposure Environment:	General Population/Uncontrolled	
Test sample No.:	YPHT20030396005	
Hardware version:	SC6531E_barphone	
Software version:	SENWA_S219T_Ver1.0	
Device Dimension:	Overall (Length x Width x Thickness): 104x53x17mm	
Maximum SAR Value		
Separation Distance:	Body-worn:	15mm
Max Report SAR Value(1g):	**Head:**	0.119 W/kg
	Body-worn:	0.294 W/kg
GSM		
Operation Band:	GSM850 PCS1900	
Support Network:	GSM,GPRS	
Operating Mode:	GSM:GMSK GPRS:GMSK	
GPRS Multi-Slot Class:	12	
Antenna Type:	PIFA	
Bluetooth		
Version:	BT2.1+EDR	
Operating Mode:	GFSK π/4DQPSK 8DPSK	
Antenna Type:	PIFA	

Remark:

1. *The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power.*

3. Test Environment

3.1. Test laboratory

Laboratory:Shenzhen Huatongwei International Inspection Co., Ltd.
Address: 1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China

3.2. Test Facility

CNAS-Lab Code: L1225

Shenzhen Huatongwei International Inspection Co., Ltd. has been assessed and proved to be in compliance with CNAS-CL01 Accreditation Criteria for Testing and Calibration Laboratories (identical to ISO/IEC17025: 2005 General Requirements) for the Competence of Testing and Calibration Laboratories.

A2LA-Lab Cert. No.: 3902.01

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2005 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

FCC-Registration No.: 762235

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the FCC (Federal Communications Commission). The acceptance letter from the FCC is maintained in our files. Registration 762235.

IC-Registration No.: 5377A

Two 3m Alternate Test Site of Shenzhen Huatongwei International Inspection Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for the performance of radiated measurements with Registration No. 5377A.

ACA

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory can also perform testing for the Australian C-Tick mark as a result of our A2LA accreditation.

3.3. 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	876	2020/03/03	2021/03/02
●	E-field Probe	SPEAG	ES3DV3	3292	2019/07/16	2020/07/15
●	Universal Radio Communication Tester	R&S	CMW500	137681	2019/06/27	2020/06/26
● 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	2019/10/19	2020/10/18
● System Validation						
○	System Validation Antenna	SPEAG	CLA-150	4024	2018/02/21	2021/02/20
○	System Validation Dipole	SPEAG	D450V3	1102	2018/02/23	2021/02/22
○	System Validation Dipole	SPEAG	D750V3	1180	2018/02/07	2021/02/06
●	System Validation Dipole	SPEAG	D835V2	4d238	2018/02/19	2021/02/18
○	System Validation Dipole	SPEAG	D1750V2	1164	2018/02/06	2021/02/05
●	System Validation Dipole	SPEAG	D1900V2	5d226	2018/02/22	2021/02/21
○	System Validation Dipole	SPEAG	D2450V2	1009	2018/02/05	2021/02/04
○	System Validation Dipole	SPEAG	D2600V2	1150	2018/02/05	2021/02/04
○	System Validation Dipole	SPEAG	D5GHzV2	1273	2018/02/21	2021/02/20
●	Signal Generator	R&S	SMB100A	114360	2019/08/15	2020/08/14
●	Power Viewer for Windows	R&S	N/A	N/A	N/A	N/A
●	Power sensor	R&S	NRP18A	101010	2019/08/15	2020/08/14
●	Power sensor	R&S	NRP18A	101011	2019/08/15	2020/08/14
●	Power Amplifier	BONN	BLWA 0160-2M	1811887	2019/11/14	2020/11/13
●	Dual Directional Coupler	Mini-Circuits	ZHDC-10-62-S+	F975001814	2019/11/14	2020/11/13
●	Attenuator	Mini-Circuits	VAT-3W2+	1819	2019/11/14	2020/11/13
●	Attenuator	Mini-Circuits	VAT-10W2+	1741	2019/11/14	2020/11/13

Note:

1. *The Probe,Dipole and DAE calibration reference to the Appendix B and C.*
2. *Referring to KDB865664 D01, the dipole calibration interval can be extended to 3 years with justifcatio. 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 ≤ 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.

Therefore, the measurement uncertainty is not required.

6. SAR Measurements 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.

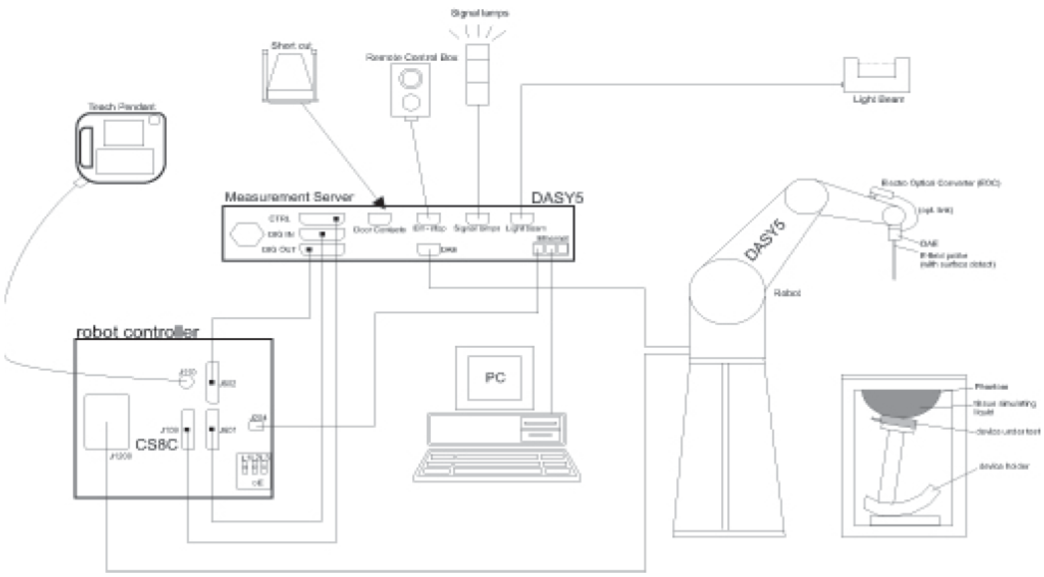
Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.

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.

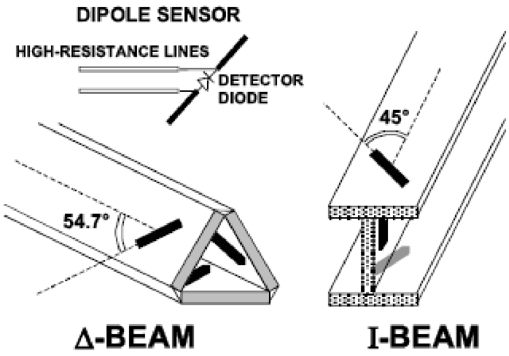
- **Probe Specification**

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: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 100 W/kg; Linearity: ± 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.

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI isfully compatible with standard and all known tissuesimulating liquids. ELI has been optimized regarding its performance and can beintegrated into our standard phantom tables. A cover prevents evaporation ofthe liquid. Reference markings on the phantom allow installation of thecomplete setup, including all predefined phantom positions and measurementgrids, by teaching three points. The phantom is compatible with all SPEAGdosimetric probes and dipoles.

SAM-Twin Phantom

ELI 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

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max. ± 5%.

The “surface check” measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above ± 0.1mm). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe (It does not depend on the surface reflectivity or the probe angle to the surface within ± 30°.)

Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values before running a detailed measurement around the hot spot.Before starting the area scan a grid spacing of 15 mm x 15 mm is set. During the scan the distance of the probe to the phantom remains unchanged. After finishing area scan, the field maxima within a range of 2 dB will be ascertained.

Zoom Scan

After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the “Not a knot” condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm.

Spatial Peak Detection

The procedure for spatial peak SAR evaluation has been implemented and can determine values of masses of 1g and 10g, as well as for user-specific masses.The DASY5 system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- boundary correction
- peak search for averaged SAR

During a maximum search, global and local maxima searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard’s method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.
Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation. Extrapolation routines require at least 10 measurement points in 3-D space.
They are used in the Zoom Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard’s method for extrapolation.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 5mm steps.

Table 1: Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v04

<table>
<tr><td colspan="3"></td><td>$\leq$ 3 GHz</td><td>> 3 GHz</td></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5 mm ± 1 mm</td><td>½·δ·ln(2) mm ± 0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30° ± 1°</td><td>20° ± 1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}</td><td>$\leq$ 2 GHz: $\leq$ 15 mm
2 – 3 GHz: $\leq$ 12 mm</td><td>3 – 4 GHz: $\leq$ 12 mm
4 – 6 GHz: $\leq$ 10 mm</td></tr>
<tr><td colspan="2">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 $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}</td><td>$\leq$ 2 GHz: $\leq$ 8 mm
2 – 3 GHz: $\leq$ 5 mm*</td><td>3 – 4 GHz: $\leq$ 5 mm*
4 – 6 GHz: $\leq$ 4 mm*</td></tr>
<tr><td rowspan="3">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2">uniform grid: $\Delta z_{Zoom}(n)$</td><td>$\leq$ 5 mm</td><td>3 – 4 GHz: $\leq$ 4 mm
4 – 5 GHz: $\leq$ 3 mm
5 – 6 GHz: $\leq$ 2 mm</td></tr>
<tr><td rowspan="2">graded grid</td><td>$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface</td><td>$\leq$ 4 mm</td><td>3 – 4 GHz: $\leq$ 3 mm
4 – 5 GHz: $\leq$ 2.5 mm
5 – 6 GHz: $\leq$ 2 mm</td></tr>
<tr><td>$\Delta z_{Zoom}(n>1)$: between subsequent points</td><td colspan="2">$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm</td></tr>
<tr><td>Minimum zoom scan volume</td><td colspan="2">x, y, z</td><td>$\geq$ 30 mm</td><td>3 – 4 GHz: $\geq$ 28 mm
4 – 5 GHz: $\geq$ 25 mm
5 – 6 GHz: $\geq$ 22 mm</td></tr>
<tr><td colspan="5">Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.
* When zoom scan is required and the <u>*reported*</u> SAR from the *area scan based 1-g SAR estimation* procedures of KDB Publication 447498 is $\leq$ 1.4 W/kg, $\leq$ 8 mm, $\leq$ 7 mm and $\leq$ 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.</td></tr>
</table>

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)
dcpi: diode compression point (DASY parameter)

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

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

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

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.

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

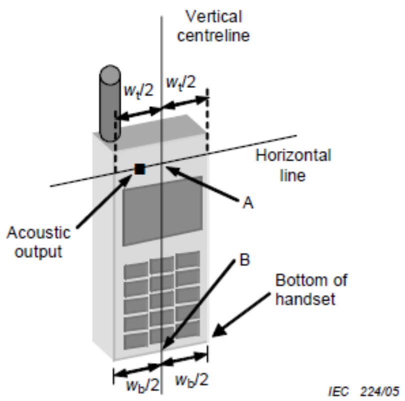
SAR: local specific absorption rate in W/kg
Etot: total field strength in V/m
σ: conductivity in [mho/m] or [Siemens/m]
ρ: equivalent tissue density in g/cm3

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.

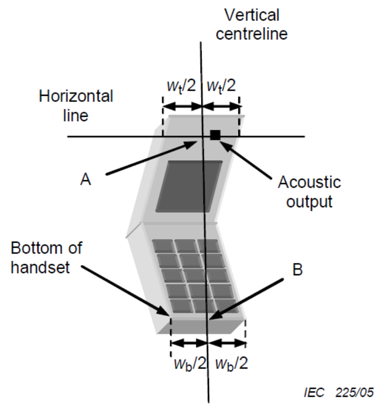
8. Position of the wireless device in relation to the phantom

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.



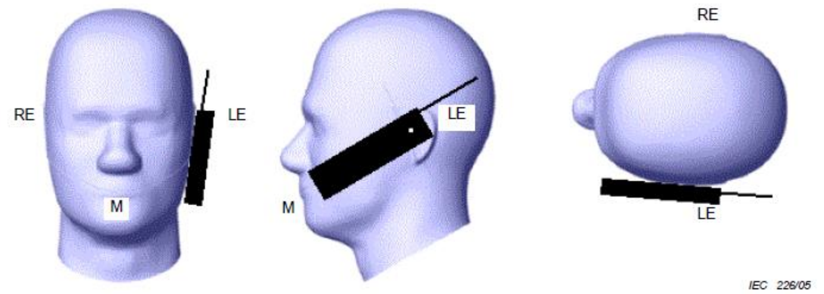
Figures 5a



Figures 5b

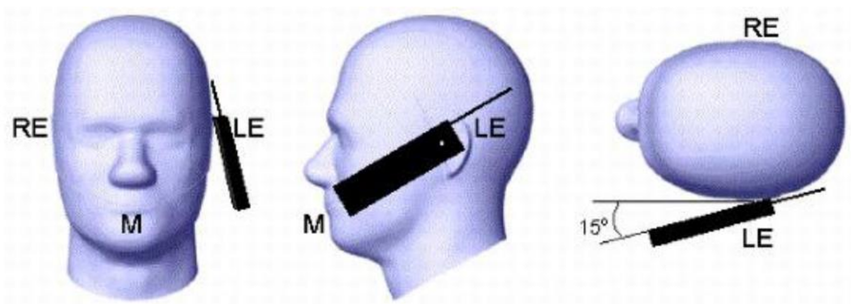
W_t	Width of the handset at the level of the acoustic
W_b	Width of the bottom of the handset
A	Midpoint of the widthwt of the handset at the level of the acoustic output
B	Midpoint of the width wb of the bottom of the handset

Cheek position



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

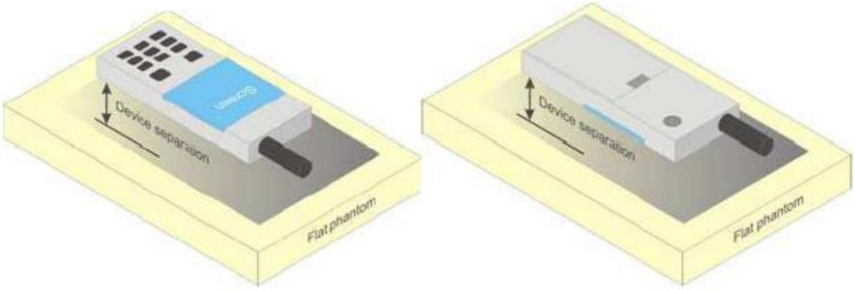
Tilt position



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 ≤ 5mm 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℃ to 25℃ and within ± 2℃ 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 (ε_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within ± 5% of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ε_r and σ may be relaxed to ± 10%. This is limited to frequencies ≤ 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	
	ε_r	σ(S/m)	ε_r	σ(S/m)
835	41.5	0.90	55.2	0.97
1800-2000	40.0	1.40	53.3	1.52

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

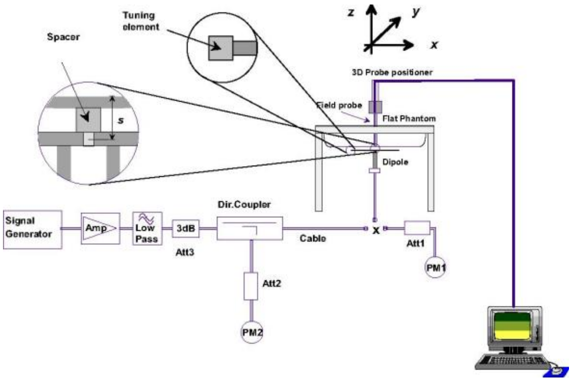
Dielectric performance of Head tissue simulating liquid									
Frequency (MHz)	ε_r		σ(S/m)		Delta (ε_r)	Delta (σ)	Limit	Temp (℃)	Date
	Target	Measured	Target	Measured					
835	41.50	42.98	0.900	0.935	3.57%	3.86%	±5%	22.5	2020/4/3
1900	40.00	40.97	1.400	1.450	2.42%	3.57%	±5%	22.5	2020/4/3

9.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
  For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- The results are normalized to 1 W input power.



System Performance Check Setup

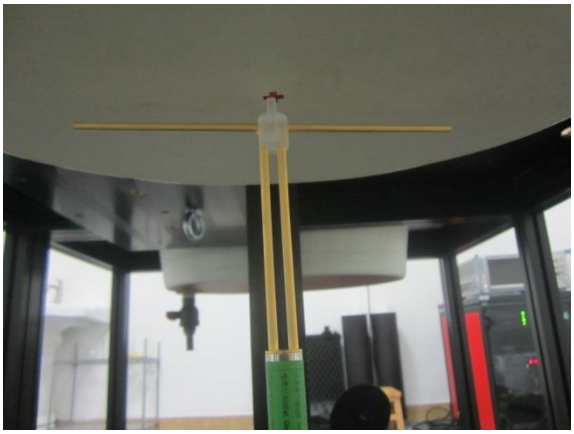


Photo of Dipole Setup

System Check Result:

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.

Head											
Frequency (MHz)	1g SAR			10g SAR			Delta (1g)	Delta (10g)	Limit	Temp (℃)	Date
	Target 1W	Normalize to 1W	Measured 250mW	Target 1W	Normalize to 1W	Measured 250mW					
835	9.51	10.12	2.53	6.15	6.52	1.63	6.41%	6.02%	±10%	22.5	2020/4/3
1900	40.30	42.00	10.50	21.10	21.56	5.39	4.22%	2.18%	±10%	22.5	2020/4/3

Plots of System Performance Check

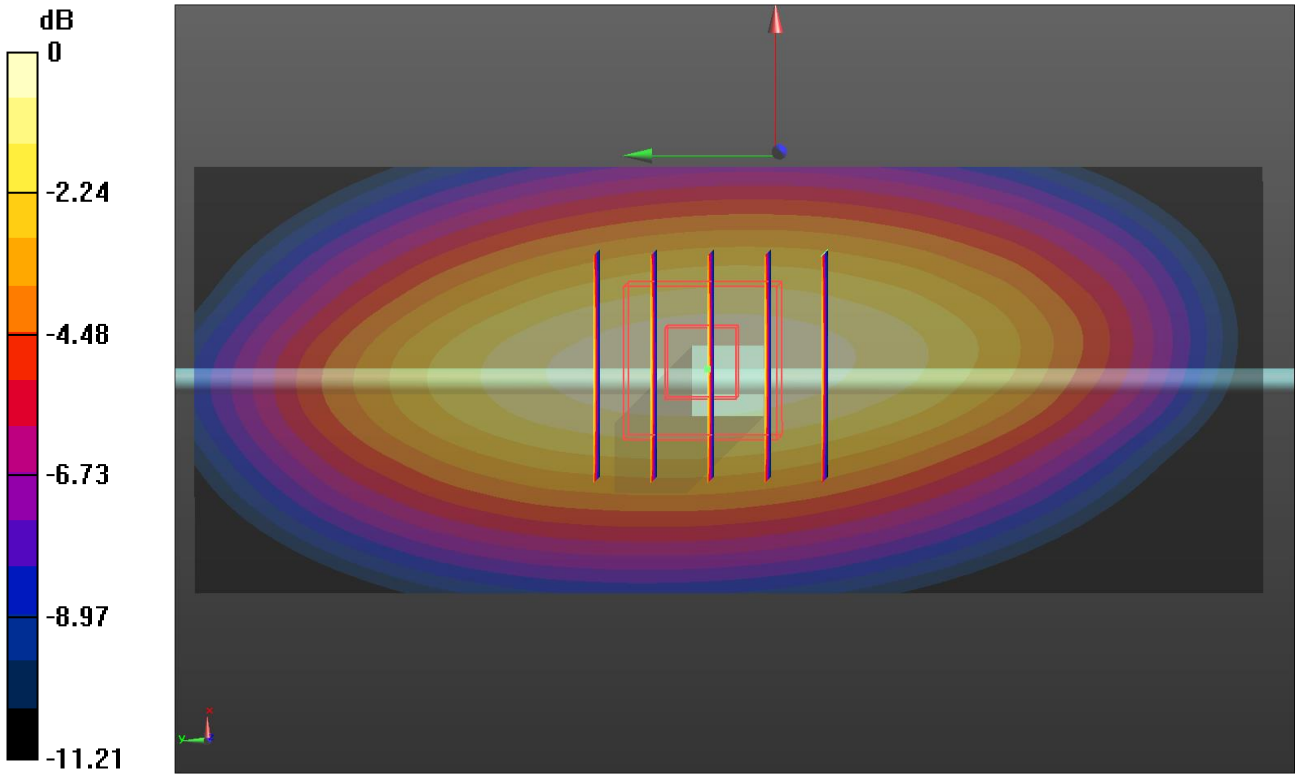
System Performance Check-Head 835MHz

DUT: D835V2; Type: D835V2; Serial: 4d238
Date: 2020-04-03
Communication System: UID 0, CW (0); Frequency: 835 MHz;Duty Cycle: 1:1
Medium parameters used: f = 835 MHz; σ = 0.935 S/m; ε_r = 42.977; ρ = 1000 kg/m^3
Phantom section: Flat Section
Ambient Temperature:22.7℃;Liquid Temperature:22.5℃;

DASY5 Configuration:

- Probe: ES3DV3 – SN3292; ConvF(6.22, 6.22, 6.22) @ 835 MHz; Calibrated: 7/16/2019
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn876; Calibrated: 3/3/2020
- 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 mm, dy=1.500 mm
Maximum value of SAR (interpolated) = 3.48 W/kg
Head/d=15mm, Pin=250mW/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 62.20 V/m; Power Drift = -0.06 dB
Peak SAR (extrapolated) = 4.09 W/kg
SAR(1 g) = 2.53 W/kg; SAR(10 g) = 1.63 W/kg
Maximum value of SAR (measured) = 3.52 W/kg



0 dB = 3.52 W/kg = 5.47 dBW/kg

System Performance Check-Head 1900MHz

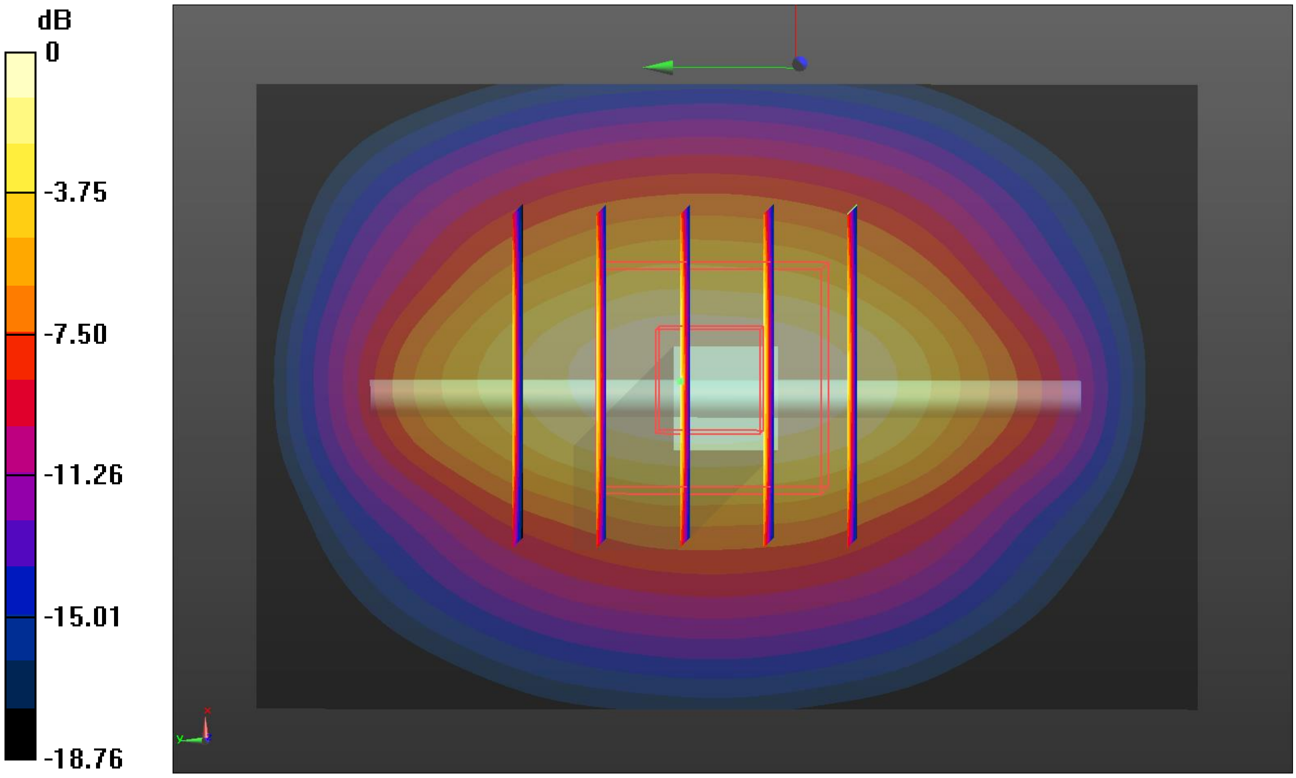
DUT: D1900V2; Type: D1900V2; Serial: 5d226
Date: 2020-04-03
Communication System: UID 0, CW (0); Frequency: 1900 MHz;Duty Cycle: 1:1
Medium parameters used: f = 1900 MHz; σ = 1.45 S/m; ε_r = 40.966; ρ = 1000 kg/m^3
Phantom section: Flat Section
Ambient Temperature:22.6℃;Liquid Temperature:22.4℃;

DASY5 Configuration:

- Probe: ES3DV3 – SN3292; ConvF(5.14, 5.14, 5.14) @ 1900 MHz; Calibrated: 7/16/2019
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn876; Calibrated: 3/3/2020
- 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) = 17.0 W/kg

Head/d=10mm,Pin=250mW/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 109.0 V/m; Power Drift = -0.09 dB
Peak SAR (extrapolated) = 20.1 W/kg
SAR(1 g) = 10.5 W/kg; SAR(10 g) = 5.39 W/kg
Maximum value of SAR (measured) = 16.5 W/kg



0 dB = 16.5 W/kg = 12.17 dBW/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

Population/Uncontrolled Environments: are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

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

11.1. GSM

1. *Per KDB 447498 D01, 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.*

Mode: GSM850		**Burst Average Power (dBm)**			Division Factors	**Frame-Average Power (dBm)**		
		CH128	CH190	CH251		CH128	CH190	CH251
		824.2MHz	836.6MHz	848.8MHz		824.2MHz	836.6MHz	848.8MHz
GSM Voice		32.49	32.81	33.18	-9.03	23.46	23.78	24.15
GPRS (GMSK)	1TXslot	32.96	32.96	33.24	-9.03	23.93	23.93	24.21
	2TXslots	31.35	31.35	31.40	-6.02	25.33	25.33	25.38
	3TXslots	29.23	29.63	29.60	-4.26	24.97	25.37	25.34
	4TXslots	27.28	27.40	27.68	-3.01	24.27	24.39	24.67
Mode: PCS1900		**Burst Average Power (dBm)**			Division Factors	**Frame-Average Power (dBm)**		
		CH512	CH661	CH810		CH512	CH661	CH810
		1850.2MHz	1880MHz	1909.8MHz		1850.2MHz	1880MHz	1909.8MHz
GSM Voice		29.81	30.41	31.46	-9.03	20.78	21.38	22.43
GPRS (GMSK)	1TXslot	29.91	30.12	30.17	-9.03	20.88	21.09	21.14
	2TXslots	28.00	28.69	29.01	-6.02	21.98	22.67	22.99
	3TXslots	26.22	26.79	27.28	-4.26	21.96	22.53	23.02
	4TXslots	24.33	24.92	25.23	-3.01	21.32	21.91	22.22

Note:

1) Division Factors

To Frame-Average Power, the division factor is as follows:

1TX-slot = 1 transmit time slot out of 8 time slots=> Burst Average Power divided by (8/1) => -9.03dB

2TX-slots = 2 transmit time slots out of 8 time slots=> Burst Average Power divided by (8/2) => -6.02dB

3TX-slots = 3 transmit time slots out of 8 time slots=> Burst Average Power divided by (8/3) => -4.26dB

4TX-slots = 4 transmit time slots out of 8 time slots=> Burst Average Power divided by (8/4) => -3.01dB

11.2. Bluetooth

Bluetooth				
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)
GFSK	0	2402	0.29	0.19
	39	2441	-0.11	-0.21
	78	2480	-0.86	-0.96
π/4QPSK	0	2402	1.39	0.26
	39	2441	1.07	-0.30
	78	2480	-0.15	-1.45
8DPSK	0	2402	**1.54**	**0.28**
	39	2441	1.23	-0.35
	78	2480	0.13	-1.43

12. Maximum Tune-up Limit

GSM		
Mode	Maximum Tune-up (dBm)	
	GSM850	PCS1900
GSM (GMSK, 1Tx Slot)	33.50	31.50
GPRS (GMSK, 1Tx Slot)	33.50	30.50
GPRS (GMSK, 2Tx Slots)	31.50	29.50
GPRS (GMSK, 3Tx Slots)	30.00	27.50
GPRS (GMSK, 4Tx Slots)	28.00	25.50

Bluetooth	
Mode	Maximum Tune-up (dBm) Conducted Average Power
GFSK	0.50
π/4QPSK	0.50
8DPSK	0.50

Per KDB 447498 D01, the 1-g and 10-g SAR test exclusion thresholds for 100MHz to 6GHz at test separation distances ≦50mm are determined by:

[(max. Power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] * [√f(GHz)] ≦3.0 for 1-g SAR

Band/Mode	F(GHz)	Position	Separation Distance (mm)	Exclusion Thresholds	SAR test exclusion
Bluetooth	2.45	Head	0	0.4	Yes
		Body	15	0.1	Yes

Per KDB 447498 D01, when the minimum test separation distance is <5mm, a distance of 5mm is applied to determine SAR test exclusion.

The test exclusion thereshold is ≦3, SAR testing is not required.

13. Measured and Reported SAR Results

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 D01 General RF Exposure Guidance:

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

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 ≤ ¼ 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 ≤ 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 ≤ 1/4dB higher than GPRS/EDGE (GMSK) or the adjusted SAR of the highest reported SAR of GPRS/EDGE (GMSK) is ≤ 1.2W/kg.

13.1. Head SAR

GSM850										
Mode	Test Position	Frequency		Conducted Power (dBm)	Tune up limit (dBm)	Tune up scaling factor	Power Drift (dB)	Measured SAR(1g) (W/kg)	Report SAR(1g) (W/kg)	Plot No.
		CH	MHz							
GPRS (3Tx slots)	Left Cheek	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	0.15	0.101	0.110	-
		251	848.8	29.60	30.00	1.096	-	-	-	-
	Left Tilt	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	-0.17	0.077	0.084	-
		251	848.8	29.60	30.00	1.096	-	-	-	-
	Right Cheek	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	-0.11	0.109	0.119	1
		251	848.8	29.60	30.00	1.096	-	-	-	-
	Right Tilt	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	0.09	0.083	0.090	-
		251	848.8	29.60	30.00	1.096	-	-	-	-

PCS1900										
Mode	Test Position	Frequency		Conducted Power (dBm)	Tune up limit (dBm)	Tune up scaling factor	Power Drift (dB)	Measured SAR(1g) (W/kg)	Report SAR(1g) (W/kg)	Plot No.
		CH	MHz							
GPRS (2Tx slots)	Left Cheek	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	0.18	0.066	0.074	-
	Left Tilt	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	-0.06	0.053	0.059	-
	Right Cheek	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	-0.03	0.069	0.077	2
	Right Tilt	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	-0.11	0.054	0.060	-

13.2. Body SAR

GSM850										
Mode	Test Position	Frequency		Conducted Power (dBm)	Tune up limit (dBm)	Tune up scaling factor	Power Drift (dB)	Measured SAR(1g) (W/kg)	Report SAR(1g) (W/kg)	Plot No.
		CH	MHz							
GPRS (3Tx slots)	Front	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	0.02	0.178	0.194	-
		251	848.8	29.60	30.00	1.096	-	-	-	-
	Rear	128	824.2	29.23	30.00	1.194	-	-	-	-
		190	836.6	29.63	30.00	1.089	-0.05	0.270	0.294	3
		251	848.8	29.60	30.00	1.096	-	-	-	-

PCS1900										
Mode	Test Position	Frequency		Conducted Power (dBm)	Tune up limit (dBm)	Tune up scaling factor	Power Drift (dB)	Measured SAR(1g) (W/kg)	Report SAR(1g) (W/kg)	Plot No.
		CH	MHz							
GPRS (2Tx slots)	Front	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	0.09	0.083	0.093	-
	Rear	512	1850.2	28.00	29.50	1.413	-	-	-	-
		661	1880	28.69	29.50	1.205	-	-	-	-
		810	1909.8	29.01	29.50	1.119	-0.12	0.131	0.147	4

SAR Test Data Plots to the Appendix A.

14. Simultaneous Transmission analysis

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

General note:

1. The reported SAR summation is calculated based on the same configuration and test position
2. For simultaneous transmission analysis, Bluetooth SAR is estimated per KDB 447498 D01 based on the formula below
   a) [(max. Power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] * [√f(GHz)/x]W/kg for test separation distances ≦50mm; whetn x=7.5 for 1-g SAR, and x=18.75 for 10-g SAR.
   b) When the minimum separation distance is <5mm, the distance is used 5mm to determine SAR test exclusion
   c) 0.4 W/kg for 1-g SAR and 1.0W/kg for 10-g SAR, when the test separation distances is >50mm.

Bluetooth Max power	Exposure position	Head	Body-worn
	Test separation	0mm	15mm
0.50 dBm	Estimated SAR (W/kg)	0.047	0.016

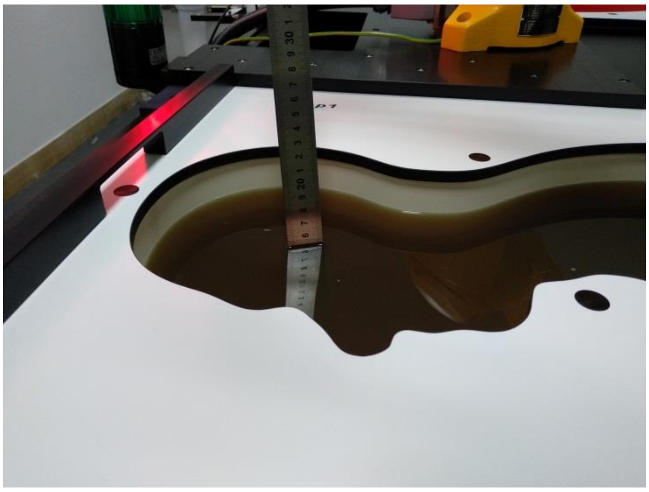
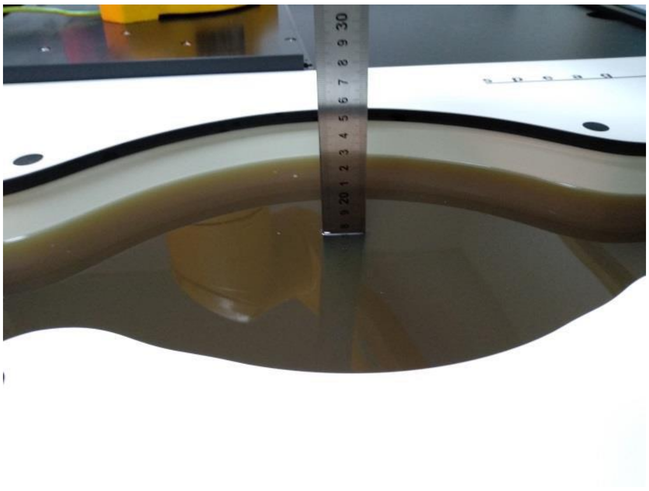
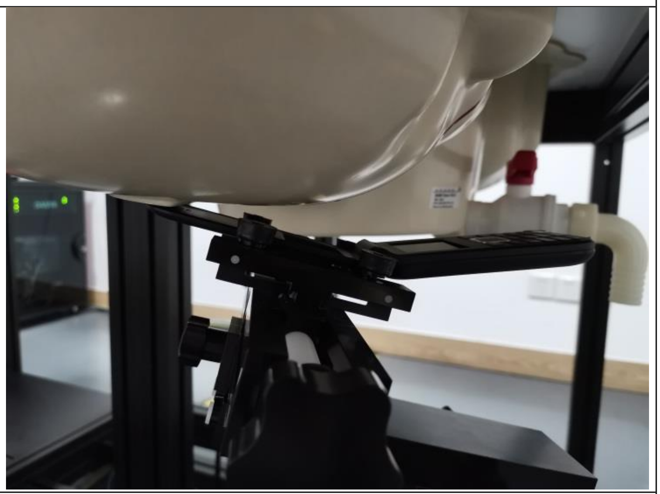
14.1. Head

PCE+ Bluetooth					
WWAN Band		Exposure Position	Max SAR (W/kg)		Summed SAR (W/kg)
			PCE	Bluetooth	
GSM	GSM850	Left Cheek	0.110	0.047	0.157
		Left Tilted	0.084	0.047	0.131
		Right Cheek	0.119	0.047	**0.166**
		Right Tilted	0.090	0.047	0.137
	PCS1900	Left Cheek	0.074	0.047	0.121
		Left Tilted	0.059	0.047	0.106
		Right Cheek	0.077	0.047	0.124
		Right Tilted	0.060	0.047	0.107

14.2. Body-worn

PCE + Bluetooth					
WWAN Band		Exposure Position	Max SAR (W/kg)		Summed SAR (W/kg)
			PCE	Bluetooth	
GSM	GSM850	Front	0.194	0.016	0.210
		Rear	0.294	0.016	**0.310**
	PCS1900	Front	0.093	0.016	0.109
		Rear	0.147	0.016	0.163

15. TestSetup Photos

	
Liquid depth in the Head phantom	Liquid depth in the Body phantom
	
Left Head Touch	Right Head Touch
	
Left Head Tilt (15^{o})	Right Head Tilt (15^{o})

	
Body-worn Front (15mm)	Body-worn Rear(15mm)

16. External and Internal Photos of the EUT

Please reference to the report No.: CHTEW20040027

---------End of Report----------