

# **SAR Test Report**

Report No.: AGC01110231219FH01A

FCC ID : 2AOKB-A3968R

**APPLICATION PURPOSE**: Class II Permissive Change

**PRODUCT DESIGNATION**: Wireless Headphone

**BRAND NAME**: soundcore

MODEL NAME : A3968R

**APPLICANT**: Anker Innovations Limited

**DATE OF ISSUE** : May 10, 2024

IEEE Std. 1528:2013

**STANDARD(S)** : FCC 47 CFR Part 2§2.1093

IEEE Std C95.1 ™-2005

**REPORT VERSION**: V1.0

Attestation of Global Compliance (Shenzhen) Co., Ltd.



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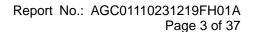
# **Report Revise Record**

Report Version	Revise Time	Issued Date	Valid Version	Notes	
V1.0	/	May 10, 2024	Valid	Initial Release	

Note: The original test report AGC01110231219FH01 (dated Jan. 10, 2024 and tested Jan. 02, 2024) was modified on May 10, 2024, including the following changes and additions for:

- -Modified the earphone battery (Replaced the battery models M1154A7, 3.85V, 60mAh with 1154PF4B, 3.85V, 60mAh);
- -Changed the manufacturer of the battery;
- -Changed the color of the prototype;

For above described changes, updated all the test data except the PK. Power.

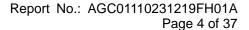




Test Report					
Applicant Name	Anker Innovations Limited				
Applicant Address	Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, HongKong				
Manufacturer Name	Anker Innovations Limited				
Manufacturer Address	Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, HongKong				
Factory Name	N/A				
Factory Address	N/A				
Product Designation	Wireless Headphone				
Brand Name	soundcore				
Model Name	A3968R				
EUT Voltage	DC 3.85V by battery				
Applicable Standard	IEEE Std. 1528:2013 FCC 47 CFR Part 2§2.1093 IEEE Std C95.1 ™-2005				
Date of receipt of test item	Apr. 07, 2024				
Test Date	Apr. 18, 2024				
Report Template	AGCRT-US-Bluetooth/SAR (2021-04-20)				

Note: The results of testing in this report apply to the product/system which was tested only.

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# 1. SUMMARY OF MAXIMUM SAR VALUE

The maximum results of Specific Absorption Rate (SAR) found during testing for EUT are as follows:

Frequency Band Highest Reported 1g-SAR(W/kg) Head SAR(with 0mm separation)		SAR Test Limit (W/kg)
BT(BR/EDR)	0.799	1.6
BT (BLE)	0.215	1.0
SAR Test Result	PASS	

This device is compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6W/kg) specified in IEEE Std. 1528:2013; FCC 47CFR § 2.1093; IEEE/ANSI C95.1:2005 and the following specific FCC Test Procedures:

- KDB 447498 D04 Interim General RF Exposure Guidance v01
- KDB 865664 D01 SAR Measurement 100MHz to 6GHz v01r04



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# 2. GENERAL INFORMATION

2.1. EUT Description

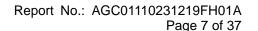
General Information						
Product Designation	Wireless Headphone					
Test Model	A3968R					
Sample ID	240403092					
Hardware Version	V5					
Software Version	V01.48					
Device Category	Portable					
RF Exposure Environment	Uncontrolled					
Antenna Type	FPC Antenna					
Bluetooth						
Operation Frequency	2402~2480MHz					
Antenna Gain	-1.7dBi					
Bluetooth Version	V5.3					
Type of modulation	BR/EDR: GFSK, ∏/4-DQPSK, 8-DPSK; BLE: GFSK					
Max. PK Power (dBm)	BR/EDR: 12.019dBm; BLE: 7.225dBm					
Li-ion Battery						
Brand Name	N/A					
Model Name	1154PF4B					
Manufacturer Name	Chongqing VDL Electronics Co.,Ltd.					
Capacitance	60mAh					
Rated Voltage/ Charging Voltage	DC3.85V					

Note: 1.The sample used for testing is end product.

2.Duty-cycle = [on time/total time] x 100%

3. The test sample has no any deviation to the test method of standard mentioned in page 1.

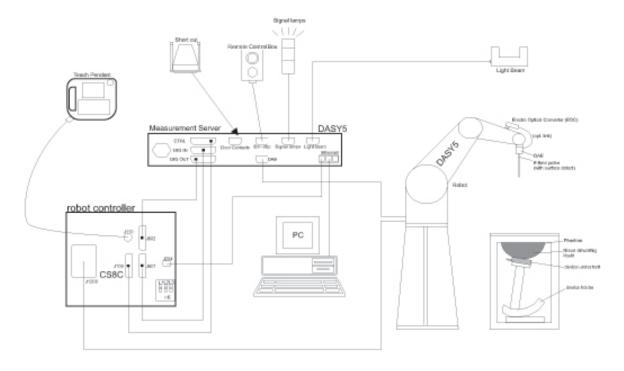
Product	Туре		
Product		☐ Identical Prototype	



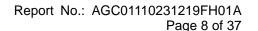


#### 3. SAR MEASUREMENT SYSTEM

#### 3.1. The DASY5 system used for performing compliance tests consists of following items



- A standard high precision 6-axis robot with controller, teach pendant and software.
- Data acquisition electronics (DAE) which attached to the robot arm extension. The DAE consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock
- A dosimetric probe equipped with an optical surface detector system.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital Communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- A Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- Phantoms, device holders and other accessories according to the targeted measurement.





#### 3.2. DASY5 E-Field Probe

The SAR measurement is conducted with the dosimetric probe manufactured by SPEAG. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. SPEAG conducts the probe calibration in compliance with international and national standards (e.g. IEEE-1528 etc.)Under ISO17025.The calibration data are in Appendix D.

**Isotropic E-Field Probe Specification** 

	d Frobe Specification
Model	EX3DV4-SN:3953
Manufacture	SPEAG
frequency	2.4GHz-6GHz Linearity:±0.9%(k=2)
Dynamic Range	0.01W/kg-100W/kg Linearity: ±0.9%(k=2)
Dimensions	Overall length:337mm Tip diameter:2.5mm Typical distance from probe tip to dipole centers:1mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.

#### 3.3. Data Acquisition Electronics description

The data acquisition electronics (DAE) consist if a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converte and a command decoder with a control logic unit. Transmission to the measurement sever is accomplished through an optical downlink fir data and status information, as well as an optical uplink for commands and the clock.

The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

#### DAE4

Input Impedance	200MOhm	pure se
The Inputs	Symmetrical and floating	Apple and the state of the stat
Common mode rejection	above 80 dB	DAGA Shares of the state of the



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#### 3.4. Robot

The DASY system uses the high precision robots (DASY5:TX60) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version from is used.

The XL robot series have many features that are important for our application:

- ☐ High precision (repeatability 0.02 mm)
- ☐ High reliability (industrial design)
- ☐ Jerk-free straight movements
- ☐ Low ELF interference (the closed metallic construction shields against motor control fields)
- □ 6-axis controller



# 3.5. Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, such that the robot coordinates are valid for the probe tip.

The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned prob.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position. e, the same position will be reached with another aligned probe within 0





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#### 3.6. Device Holder

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (EPR).

Thus the device needs no repositioning when changing the angles. The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\epsilon$ =3 and loss tangent  $\delta$  = 0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.



#### 3.7. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY5: 400 MHz, Intel Celeron), chip-disk (DASY5: 128MB), RAM (DASY5: 128MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DAYS I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.





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# 3.8. PHANTOM **SAM Twin Phantom**

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region where shell thickness increases to 6mm). It has three measurement areas:

□ Left head

☐ Right head

☐ Flat phantom



The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

# **ELI4 Phantom**

☐ Flat phantom a fiberglass shell flat phantom with 2mm+/- 0.2 mm shell thickness. It has only one measurement area for Flat phantom





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#### 4. SAR MEASUREMENT PROCEDURE

# 4.1. Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and occupational/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element(dv) of given mass density ( $\rho$ ). The equation description is as below:

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

SAR is expressed in units of Watts per kilogram (W/kg) SAR can be obtained using either of the following equations:

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

$$SAR = c_h \frac{dT}{dt}\Big|_{t=0}$$

Where

SAR is the specific absorption rate in watts per kilogram;
E is the r.m.s. value of the electric field strength in the tissue in volts per meter;
σ is the conductivity of the tissue in siemens per metre;
is the density of the tissue in kilograms per cubic metre;

is the heat capacity of the tissue in joules per kilogram and Kelvin;

 $\frac{dT}{dt}$  | t = 0 is the initial time derivative of temperature in the tissue in kelvins per second



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#### 4.2. SAR Measurement Procedure

#### Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurement are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface is 2.7mm This distance cannot be smaller than the distance os 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 2dB range is required in IEEE Standard 1528, whereby 3db is a requirement when compliance is assessed in accordance with the ARIB standard (Japan) If one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximum are detected, the number of Zoom Scan has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100MHz to 6GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
	≤2 GHz: ≤15 mm 2 – 3 GHz: ≤12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
Maximum area scan spatial resolution: Δx <sub>Area</sub> , Δy <sub>Area</sub>	When the x or y dimension o measurement plane orientation the measurement resolution r x or y dimension of the test of measurement point on the test	on, is smaller than the above, nust be ≤ the corresponding levice with at least one

# Step 3: Zoom Scan

Zoom Scan are used to assess the peak spatial SAR value within a cubic average volume containing 1g abd 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 1g and 10g and displays these values next to the job's label.



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#### Zoom Scan Parameters extracted from KDB865664 d01 SAR Measurement 100MHz to 6GHz

Maximum zoom scan s	patial reso	lution: Δx <sub>Zoom</sub> , Δy <sub>Zoom</sub>	≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform	grid: Δz <sub>Zoom</sub> (n)	3 - 4 GHz: ≤ 4 mm 4 - 5 GHz: ≤ 3 mm 5 - 6 GHz: ≤ 2 mm		
	$\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface		≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm	
	grid	Δz <sub>Zoom</sub> (n>1): between subsequent points	≤ 1.5·Δz	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

#### 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 same settings. 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.

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



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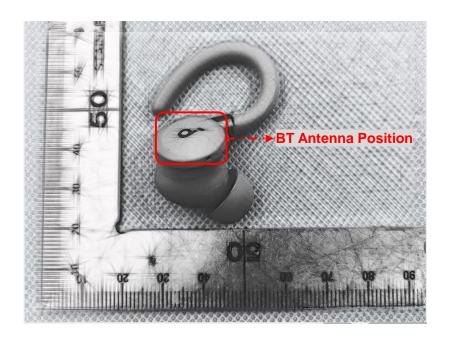
# 4.3. RF Exposure Conditions

Test Configuration and setting:

The device is a bluetooth headset, and supports Bluetooth wireless technology.

For SAR testing, the device was controlled by software to test at reference fixed frequency points.

#### **Antenna Location:**





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# SAR Test Exclusion Consideration for Adjacent Edges Per KDB 447498 D04 Appendix B:

B.3 MPE-based Exemption: For mobile devices that are not exempt per Table B.1 [Table 1 of § 1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in § 1.1310 is necessary if the ERP of the device is greater than ERP 20cm in Formula (B.1) [repeated from § 2.1091(c)(1) and § 1.1307(b)(1)(i)(B)].

$$P_{\text{th}} (\text{mW}) = ERP_{20 \text{ cm}} (\text{mW}) = \begin{cases} 2040f & 0.3 \text{ GHz} \le f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \le f \le 6 \text{ GHz} \end{cases}$$
(B. 1)

B.4 SAR-based Exemption: This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P<sub>th</sub> is given by Formula (B.2).

$$P_{\rm th} \ ({\rm mW}) = \begin{cases} ERP_{\rm 20\ cm} (d/20\ {\rm cm})^x & d \le 20\ {\rm cm} \\ \\ ERP_{\rm 20\ cm} & 20\ {\rm cm} < d \le 40\ {\rm cm} \end{cases} \eqno(B.2)$$

where

$$x = -\log_{10}\left(\frac{60}{ERP_{20\,\mathrm{cm}}\sqrt{f}}\right)$$

and f is in GHz, d is the separation distance (cm), and  $ERP_{20cm}$  is per Formula (B.1). The example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

			ioic D.		mipie	1011101	1111001	iorus (ii	,		
		Distance (mm)									
		5	10	15	20	25	30	35	40	45	50
(Z	300	39	65	88	110	129	148	166	184	201	217
(MHz)	450	22	44	67	89	112	135	158	180	203	226
	835	9	25	44	66	90	116	145	175	207	240
enc	1900	3	12	26	44	66	92	122	157	195	236
Frequency	2450	3	10	22	38	59	83	111	143	179	219
F	3600	2	8	18	32	49	71	96	125	158	195
	5800	1	6	14	25	40	58	80	106	136	169

Test mode	Ch.(GHz)	Distance (mm)	Х	P <sub>th</sub> (mW)	Max.power (dBm)	Max.power (mW)	SAR test (Yes/No)			
Right Ear.										
BR/EDR	2.480	5	1.905	2.717	12.019	15.918	Yes			
BT (BLE) _GFSK_1M	2.480	5	1.905	2.717	7.225	5.278	Yes			



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# 5. TISSUE SIMULATING LIQUID

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15cm. For head SAR testing the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15cm For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 10% are listed in 6.2

5.1. The composition of the tissue simulating liquid

Ingredient (% Weight) Frequency (MHz)	Water	Nacl	Polysorbate 20	DGBE	1,2 Propanediol	Triton X-100
2450 Head	71.88	0.16	0.0	7.99	0.0	19.97

#### 5.2. Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE 1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in IEEE 1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in IEEE 1528.

Target Frequency	he	ad	k	oody
(MHz)	εr	σ (S/m)	εr	σ (S/m)
300	45.3	0.87	45.3	0.87
450	43.5	0.87	43.5	0.87
835	41.5	0.90	41.5	0.90
900	41.5	0.97	41.5	0.97
915	41.5	1.01	41.5	1.01
1450	40.5	1.20	40.5	1.20
1610	40.3	1.29	40.3	1.29
1800 – 2000	40.0	1.40	40.0	1.40
2450	39.2	1.80	39.2	1.80
3000	38.5	2.40	38.5	2.40

( $\varepsilon r = relative permittivity$ ,  $\sigma = conductivity and <math>\rho = 1000 \text{ kg/m}3$ )



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#### 5.3. Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using DASY 5 Dielectric Probe Kit and R&S Network Analyzer ZVL6.

		Tissue Stimulant Me	easurement for 2450MHz			
	Fr.	Dielectric Parameters (±10%)  Tissue				
	(MHz)	εr39.2(35.28-43.12)	δ[s/m]1.80(1.62-1.98)	Temp [°C]	Test time	
	2402	40.13	1.71			
Head	2440	39.67	1.73		A	
	2441	39.67	1.73	21.1	Apr. 18, 2024	
	2450	38.16	1.76		2024	
	2480	37.66	1.78			



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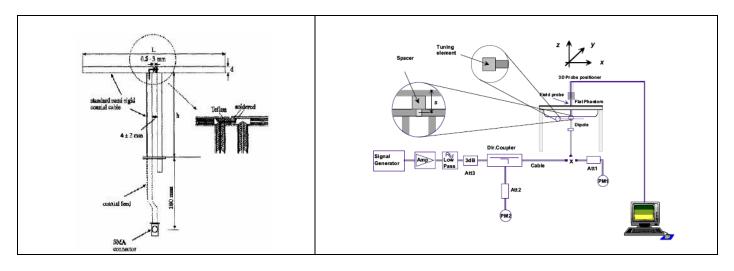
#### 6. SAR SYSTEM CHECK PROCEDURE

#### 6.1. SAR System Check Procedures

SAR system check 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 remeasured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

Each DASY system is equipped with one or more system check kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system check and system validation. System kit includes a dipole, and dipole device holder.

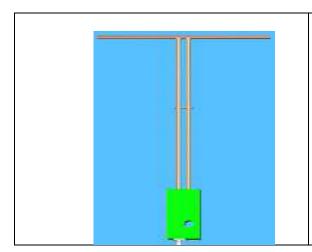
The system check verifies that the system operates within its specifications. It's performed daily or before every SAR measurement. The system check uses normal SAR measurement in the flat section of the phantom with a matched dipole at a specified distance. The system check setup is shown as below.





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# 6.2. SAR System Check 6.2.1. Dipoles



The dipoles used are based on the IEEE-1528 standard, and is complied with mechanical and electrical specifications in line with the requirements of IEEE. the table below provides details for the mechanical and electrical specifications for the dipoles.

Frequency	L (mm)	h (mm)	d (mm)
2450MHz	51.5	30.4	3.6



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# 6.2.2. System Check Result

System Performance Check at 2450MHz for Head									
Validation Kit: D2450V2-SN:968									
Frequency		get (W/kg)		ce Result 0%)		sted (W/kg)	Tissue Temp.	Test time	
[MHz]	1g	10g	1g	10g	1g	10g	[°C]		
2450	53.5	25.0	48.15-58.85	22.50-27.50	52.40	23.90	21.1	Apr. 18, 2024	

#### Note:

(1) We use a CW signal of 10dBm for system check, and then all SAR values are normalized to 1W forward power. The result must be within ±10% of target value.



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# 7. EUT TEST POSITION

This EUT was tested in Back, Front.

#### 7.1. Test Position

- (1) To position the EUT parallel to the phantom surface.
- (2) To adjust the EUT parallel to the flat phantom.
- (3) To adjust the distance between the EUT surface and the flat phantom to 0mm.



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# 8. SAR EXPOSURE LIMITS

Limits for General Population/Uncontrolled Exposure (W/kg)

Type Exposure	Uncontrolled Environment Limit (W/kg)
Spatial Peak SAR (1g cube tissue for brain or body)	1.60
Spatial Average SAR (Whole body)	0.08
Spatial Peak SAR (Limbs)	4.0



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# 9. TEST FACILITY

Test Site	Attestation of Global Compliance (Shenzhen) Co., Ltd
Location	1-2/F, Building 19, Junfeng Industrial Park, Chongqing Road, Heping Community, Fuhai Street, Bao'an District, Shenzhen, Guangdong, China
Designation Number	CN1259
FCC Test Firm Registration Number	975832
A2LA Cert. No.	5054.02
Description	Attestation of Global Compliance(Shenzhen) Co., Ltd is accredited by A2LA



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# 10. TEST EQUIPMENT LIST

Equipment description	Manufacturer/ Model	Identification No.	Software version	Current calibration date	Next calibration date
Stäubli Robot	Stäubli-TX60	F13/5Q2UD1/A/01	N/A	N/A	N/A
Robot Controller	Stäubli-CS8	139522	N/A	N/A	N/A
E-Field Probe	Speag- EX3DV4	SN:3953	N/A	Sep. 05, 2023	Sep. 04, 2024
SAM Twin Phantom	Speag-SAM	1790	N/A	N/A	N/A
Device Holder	Speag-SD 000 H01 KA	SD 000 H01 KA	N/A	N/A	N/A
DAE4	Speag-SD 000 D04 BM	1398	N/A	May 17, 2023	May 16, 2024
SAR Software	Speag-DASY5	DASY52.8.7.1137	N/A	N/A	N/A
Liquid	SATIMO	-	N/A	N/A	N/A
Dipole	D2450V2	SN968	N/A	May 18, 2023	May 17, 2026
Signal Generator	Agilent-E4438C	US41461365	V5.03	Jun. 01, 2023	May 31, 2024
EXA Signal Analyzer	Agilent / N9010A	MY53470504	N/A	Jun. 01, 2023	May 31, 2024
Network Analyzer	Rhode & Schwarz ZVL6	SN101443	3.2	Sep. 21, 2023	Sep. 20, 2024
Attenuator	Warison /WATT-6SR1211	S/N:WRJ34AYM2F1	N/A	June 07, 2023	June 06, 2024
Attenuator	Mini-circuits / VAT-10+	31405	N/A	June 07, 2023	June 06, 2024
Amplifier	AS0104-55_55	1004793	N/A	N/A	N/A
Directional Couple	Werlatone/ C5571-10	SN99463	N/A	Feb. 01, 2024	Jan. 31, 2026
Directional Couple	Werlatone/ C6026-10	SN99482	N/A	Feb. 01, 2024	Jan. 31, 2026
Power Sensor	NRP-Z21	1137.6000.02	N/A	Sep. 05, 2023	Sep. 04, 2024
Power Sensor	NRP-Z23	100323	N/A	Jun. 06, 2023	Jun. 05, 2024
Power Viewer	R&S	V2.3.1.0	N/A	N/A	N/A
Calibration standard parts for network sub - port	R&S/ ZV-Z132	N/A	V2.3.1.0	Nov. 11, 2023	Nov. 10, 2024

Note: Per KDB 865664 Dipole SAR Validation, AGC Lab has adopted 3 years calibration intervals. On annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

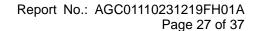
- 1. There is no physical damage on the dipole;
- 2. System validation with specific dipole is within 10% of calibrated value;
- 3. Return-loss is within 20% of calibrated measurement;
- 4. Impedance is within  $5\Omega$  of calibrated measurement.



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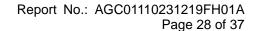
# 11. MEASUREMENT UNCERTAINTY

11. MEASUREMENT U	. TOLI			ty- EX3DV	4				
Measu	ırement ur	ncertainty fo				/ 10 gram.			
a	b	С	d	e f(d,k)	f	g	h cxf/e	i c×g/e	k
Uncertainty Component	Sec.	Tol (± %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (±%)	10g Ui (±%)	vi
Measurement System		(/					,	( 1 2 )	
Probe calibration	E.2.1	6.95	N	1	1	1	6.95	6.95	∞
Axial Isotropy	E.2.2	0.6	R	√3	√0.5	√0.5	0.24	0.24	∞
Hemispherical Isotropy	E.2.2	1.6	R	<del>√</del> 3	√0.5	√0.5	0.65	0.65	∞
Boundary effect	E.2.3	1	R	<del>,</del> √3	1	1	0.58	0.58	∞
Linearity	E.2.4	0.45	R	<del>√</del> 3	1	1	0.26	0.26	∞
System detection limits	E.2.4	1	R	<del>√</del> 3	1	1	0.58	0.58	∞
Modulation response	E2.5	3.3	R	<del>√</del> 3	1	1	1.91	1.91	∞
Readout Electronics	E.2.6	0.15	N	1	1	1	0.15	0.15	∞
Response Time	E.2.7	0	R	√3	1	1	0.00	0.00	∞
Integration Time	E.2.8	1.7	R	√3	1	1	0.98	0.98	∞
RF ambient conditions-Noise	E.6.1	3	R	√3	1	1	1.73	1.73	∞
RF ambient conditions-reflections	E.6.1	3	R	√3	1	1	1.73	1.73	∞
Probe positioner mechanical tolerance	E.6.2	0.4	R	√3	1	1	0.23	0.23	∞
Probe positioning with respect to phantom shell	E.6.3	6.7	R	√3	1	1	3.87	3.87	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	4	R	√3	1	1	2.31	2.31	8
Test sample Related									
Test sample positioning	E.4.2	2.9	N	1	1	1	2.90	2.90	∞
Device holder uncertainty	E.4.1	3.6	N	1	1	1	3.60	3.60	∞
Output power variation—SAR drift measurement	E.2.9	5	R	√3	1	1	2.89	2.89	∞
SAR scaling	E.6.5	5	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	6.6	R	√3	1	1	3.81	3.81	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.90	1.60	8
Liquid conductivity measurement	E.3.3	4	N	1	0.78	0.71	3.12	2.84	М
Liquid permittivity measurement	E.3.3	5	N	1	0.23	0.26	1.15	1.30	М
Liquid conductivity—temperature uncertainty	E.3.4	2.5	R	√3	0.78	0.71	1.13	1.02	∞
Liquid permittivity—temperature uncertainty	E.3.4	2.5	R	√3	0.23	0.26	0.33	0.38	∞
Combined Standard Uncertainty			RSS				11.97	11.80	
Expanded Uncertainty (95% Confidence interval)			K=2				23.93	23.61	





Custon	o Chook w			ty- EX3DV		/10 gram			
a	b Check ur	ncertainty fo c	d d	е	f	g g	h	i ,	k
Uncertainty Component	Sec.	Tol (± %)	Prob. Dist.	f(d,k) Div.	Ci (1g)	Ci (10g)	c×f/e 1g Ui (±%)	c×g/e 10g Ui (±%)	vi
Measurement System		(± /0)	Dist.				(±/0)	[ (± /0)	
Probe calibration drift	E.2.1	0.5	N	1	1	1	0.5	0.5	∞
Axial Isotropy	E.2.2	0.6	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Hemispherical Isotropy	E.2.2	1.6	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Boundary effect	E.2.3	1	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Linearity	E.2.4	0.45	R	$\sqrt{3}$	0	0	0.00	0.00	∞
System detection limits	E.2.4	1	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Modulation response	E2.5	3.3	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Readout Electronics	E.2.6	0.15	N	1	0	0	0.00	0.00	∞
Response Time	E.2.7	0	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Integration Time	E.2.8	1.7	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-reflections	E.6.1	3	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Probe positioner mechanical tolerance	E.6.2	0.4	R	√3	1	1	0.37	0.37	∞
Probe positioning with respect to phantom shell	E.6.3	6.7	R	$\sqrt{3}$	1	1	3.87	3.87	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	4	R	√3	0	0	0.00	0.00	∞
System check source (dipole)						_			
Deviation of experimental dipoles	E.6.4	2.0	N	1	1	1	2.00	2.00	∞
Input power and SAR drift measurement	8,6.6.4	5.0	R	√3	1	1	2.89	2.89	∞
Dipole axis to liquid distance	8,E.6.6	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	6.6	R	√3	1	1	3.81	3.81	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.90	1.60	∞
Liquid conductivity measurement	E.3.3	4	N	1	0.78	0.71	3.12	2.84	М
Liquid permittivity measurement	E.3.3	5	N	1	0.23	0.26	1.15	1.30	М
Liquid conductivity—temperature uncertainty	E.3.4	2.5	R	$\sqrt{3}$	0.78	0.71	1.13	1.02	∞
Liquid permittivity—temperature uncertainty	E.3.4	2.5	R	$\sqrt{3}$	0.23	0.26	0.33	0.38	∞
Combined Standard Uncertainty			RSS				7.34	7.07	
Expanded Uncertainty (95% Confidence interval)			K=2				14.67	14.14	





System	Validation			ty- EX3DV		m / 10 gram			
a	b	C	d d	e f(d,k)	f	g	h cxf/e	i c×g/e	k
Uncertainty Component	Sec.	Tol (±%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (±%)	10g Ui (±%)	vi
Measurement System									
Probe calibration	E.2.1	6.95	N	1	1	1	6.95	6.95	∞
Axial Isotropy	E.2.2	0.6	R	$\sqrt{3}$	1	1	0.35	0.35	∞
Hemispherical Isotropy	E.2.2	1.6	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Boundary effect	E.2.3	1	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	E.2.4	0.45	R	$\sqrt{3}$	1	1	0.26	0.26	∞
System detection limits	E.2.4	1	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Modulation response	E2.5	3.3	R	$\sqrt{3}$	0	0	0.00	0.00	∞
Readout Electronics	E.2.6	0.15	N	1	1	1	0.15	0.15	∞
Response Time	E.2.7	0	R	√3	0	0	0.00	0.00	∞
Integration Time	E.2.8	1.7	R	$\sqrt{3}$	0	0	0.00	0.00	∞
RF ambient conditions-Noise	E.6.1	3	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient conditions-reflections	E.6.1	3	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner mechanical tolerance	E.6.2	0.4	R	√3	1	1	0.23	0.23	8
Probe positioning with respect to phantom shell	E.6.3	6.7	R	√3	1	1	3.87	3.87	∞
Extrapolation, interpolation, and integrations algorithms for max. SAR evaluation	E.5	4	R	√3	1	1	2.31	2.31	∞
System check source (dipole)									
Deviation of experimental dipole from numerical dipole	E.6.4	5.0	N	1	1	1	5.00	5.00	∞
Input power and SAR drift measurement	8,6.6.4	5.0	R	√3	1	1	2.89	2.89	∞
Dipole axis to liquid distance	8,E.6.6	2.0	R	√3	1	1	1.15	1.15	∞
Phantom and tissue parameters									
Phantom shell uncertainty—shape, thickness, and permittivity	E.3.1	6.6	R	√3	1	1	3.81	3.81	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E.3.2	1.9	N	1	1	0.84	1.90	1.60	8
Liquid conductivity measurement	E.3.3	4	N	1	0.78	0.71	3.12	2.84	М
Liquid permittivity measurement	E.3.3	5	N	1	0.23	0.26	1.15	1.30	М
Liquid conductivity—temperature uncertainty	E.3.4	2.5	R	√3	0.78	0.71	1.13	1.02	8
Liquid permittivity—temperature uncertainty	E.3.4	2.5	R	√3	0.23	0.26	0.33	0.38	8
Combined Standard Uncertainty			RSS				11.62	11.46	
Expanded Uncertainty (95% Confidence interval)			K=2				23.25	22.91	



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# 12. CONDUCTED POWER MEASUREMENT

#### Bluetooth V5.3

Modulation	Channel	Frequency(MHz)	PK. Power (dBm)		
BR/EDR					
GFSK	0	2402	11.537		
	39	2441	11.795		
	78	2480	11.985		
π /4-DQPSK	0	2402	11.516		
	39	2441	11.806		
	78	2480	12.011		
8-DPSK	0	2402	11.545		
	39	2441	11.819		
	78	2480	12.019		
BLE					
GFSK 1M	0	2402	6.748		
	19	2440	7.057		
	39	2480	7.225		



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#### 13. TEST RESULTS

# 13.1. SAR Test Results Summary 13.1.1. Test position and configuration

1. The EUT is a model of Bluetooth headset.

According to KDB 447498 D04 General RF Exposure Guide v01, due to maximum peak power for bluetooth is more than just a test exclusion threshold, which must be tested.

- 2. Test procedure:
  - (1) Lab. test 1-g SAR at a test separation distance of 0mm from the flat phantom filled with head tissue simulating Liquid.
- 1. For SAR testing, the device was controlled by software to test at reference fixed frequency points.

#### 13.1.2. Operation Mode

output power(mw) ]

- 1. Per KDB 447498 D04 v01 ,for each exposure position, if the highest 1-g SAR is ≤ 0.8 W/kg, testing for low and high channel is optional.
- 2. Per KDB 865664 D01 v01r04,for each frequency band, if the measured SAR is ≥0.8W/kg, testing for repeated SAR measurement is required, that the highest measured SAR is only to be tested. When the SAR results are near the limit, the following procedures are required for each device to verify these types of SAR measurement related variation concerns by repeating the highest measured SAR configuration in each frequency band.
  - (1) When the original highest measured SAR is ≥0.8W/kg, repeat that measurement once.
  - (2) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is >1.20 or when the original or repeated measurement is ≥1.45 W/kg.
  - (3) Perform a third repeated measurement only if the original, first and second repeated measurement is ≥1.5 W/kg and ratio of largest to smallest SAR for the original, first and second measurement is ≥ 1.20.
- 3. Maximum Scaling SAR in order to calculate the Maximum SAR values to test under the standard Peak Power, Calculation method is as follows:

  Maximum Scaling SAR =tested SAR (Max.) ×[maximum turn-up power (mw)/ maximum measurement



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# 13.1.3. Test Result

SAR MEASUREMENT												
Depth of Liquid (cm):>15				Rela	Relative Humidity (%): 53.8							
Product: Wireless Headphone												
Test Mode: Bluetooth for head liquid												
Position	Mode	Ch.	Fr. (MHz)	Power Drift (<±0.2d B)	SAR (1g) (W/kg)	Max. Tune-up Power (dBm)	Meas. output Power (dBm)	Scaled SAR (W/kg)	Limit W/kg			
Test Mode: BT (BR/EDR)												
Back	1DH5	0	2402	-0.13	0.507	12.50	11.537	0.633	1.6			
Back	1DH5	39	2441	0.15	0.679	12.50	11.795	0.799	1.6			
Back	1DH5	78	2480	0.13	0.570	12.50	11.985	0.642	1.6			
Front	1DH5	39	2441	0.15	0.184	12.50	11.795	0.216	1.6			
Test Mode: BT (BLE)_GFSK 1M												
Back	GFSK	0	2402	0.19	0.181	7.50	6.748	0.215	1.6			
Back	GFSK	19	2440	0.10	0.194	7.50	7.057	0.215	1.6			
Back	GFSK	39	2480	0.10	0.169	7.50	7.225	0.180	1.6			
Front	GFSK	19	2440	0.13	0.051	7.50	7.057	0.056	1.6			

#### Note:

- When the 1-g SAR is  $\leq$  0.8W/kg, testing for low and high channel is optional.
- The test separation of all above table is 0mm.
- Plots are only shown for the bold markered worst case SAR results.



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# APPENDIX A. SAR SYSTEM CHECK DATA

Test Laboratory: AGC Lab Date: Apr. 18, 2024

System Check Head 2450 MHz

DUT: Dipole 2450 MHz Type: D2450V2

Communication System CW; Communication System Band: D2450 (2450.0 MHz); Duty Cycle: 1:1;

Frequency: 2450 MHz; Medium parameters used: f = 2450 MHz;  $\sigma = 1.76$  mho/m;  $\epsilon r = 38.16$ ;  $\rho = 1000$  kg/m<sup>3</sup>;

Phantom section: Flat Section; Input Power=10dBm

Ambient temperature ( $^{\circ}$ C): 21.6, Liquid temperature ( $^{\circ}$ C): 21.1

#### **DASY Configuration:**

- Probe: EX3DV4 SN:3953; ConvF(7.78, 7.78, 7.78); Calibrated: Sep. 05, 2023;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection), z = 1.0, 31.0
- Electronics: DAE4 SN1398; Calibrated: May 17, 2023
- Phantom: SAM (20deg probe tilt) with CRP v5.0; Type: QD000P40CD;
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

**Configuration/System Check Head 2450MHz/Area Scan (5x8x1):** Measurement grid: dx=15mm, dy=15mm Maximum value of SAR (measured) = 0.692 W/kg

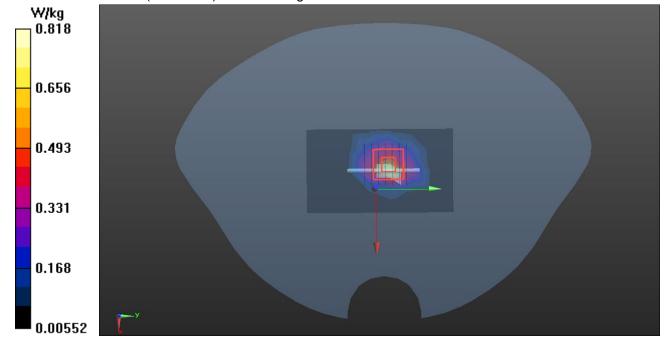
# Configuration/System Check Head 2450MHz/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm,

dy=5mm, dz=5mm

Reference Value = 19.462 V/m; Power Drift = 0.38 dB

Peak SAR (extrapolated) = 1.14 W/kg

SAR(1 g) = 0.524 W/kg; SAR(10 g) = 0.239 W/kgMaximum value of SAR (measured) = 0.818 W/kg





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# APPENDIX B. SAR MEASUREMENT DATA

Test Laboratory: AGC Lab Date: Apr. 18, 2024

BT(BR/EDR) Mid-Back (1DH5)

DUT: Wireless Headphone; Type: A3968R

Communication System: Bluetooth; Communication System Band: Bluetooth; Duty Cycle: 57.69%;

Frequency: 2441 MHz; Medium parameters used: f = 2450 MHz;  $\sigma = 1.73$  mho/m;  $\epsilon r = 39.67$ ;  $\rho = 1000$  kg/m<sup>3</sup>;

Phantom section: Flat Section

Ambient temperature ( $^{\circ}$ ): 21.6, Liquid temperature ( $^{\circ}$ ):21.1

#### **DASY Configuration:**

- Probe: EX3DV4 SN:3953; ConvF(7.78, 7.78, 7.78); Calibrated: Sep. 05, 2023;
- Sensor-Surface: 3mm (Mechanical Surface Detection), z = 1.0, 31.0
- Electronics: DAE4 SN1398; Calibrated: May 17, 2023
- Phantom: SAM (20deg probe tilt) with CRP v5.0; Type: QD000P40CD;
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

BODY/BACK/Area Scan (6x9x1): Measurement grid: dx=15mm, dy=15mm

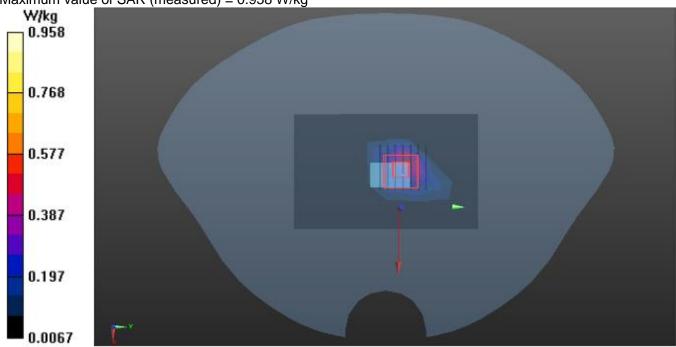
Maximum value of SAR (measured) = 0.525 W/kg

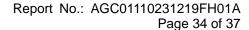
BODY/BACK/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 13.224 V/m; Power Drift = 0.15 dB

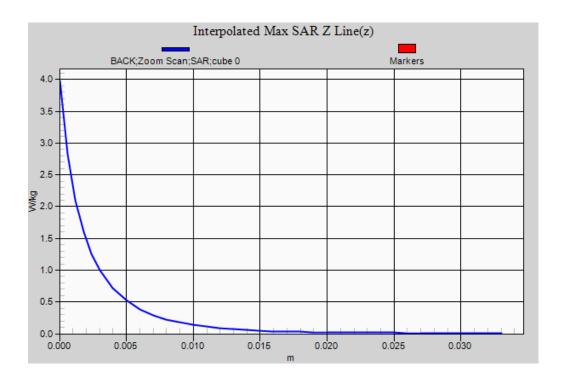
Peak SAR (extrapolated) = 3.97 W/kg

SAR(1 g) = 0.679 W/kg; SAR(10 g) = 0.201 W/kg Maximum value of SAR (measured) = 0.958 W/kg











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Test Laboratory: AGC Lab

Date: Apr. 18, 2024

BT (BLE) Mid- Back (GFSK\_1M)

DUT: Wireless Headphone; Type: A3968R

Communication System: Bluetooth; Communication System Band: Bluetooth; Duty Cycle: 62.30%;

Frequency: 2440 MHz; Medium parameters used: f = 2450 MHz;  $\sigma = 1.73$  mho/m;  $\epsilon r = 39.67$ ;  $\rho = 1000$  kg/m<sup>3</sup>;

Phantom section: Flat Section

Ambient temperature ( $^{\circ}$ ): 21.6, Liquid temperature ( $^{\circ}$ ):21.1

# **DASY Configuration:**

- Probe: EX3DV4 SN:3953; ConvF(7.78, 7.78, 7.78); Calibrated: Sep. 05, 2023;
- Sensor-Surface: 3mm (Mechanical Surface Detection), z = 1.0, 31.0
- Electronics: DAE4 SN1398; Calibrated: May 17, 2023
- Phantom: SAM (20deg probe tilt) with CRP v5.0; Type: QD000P40CD;
- DASY52 52.8.7(1137); SEMCAD X 14.6.10(7164)

BODY/BACK-BLE-1M/Area Scan (6x9x1): Measurement grid: dx=15mm, dy=15mm

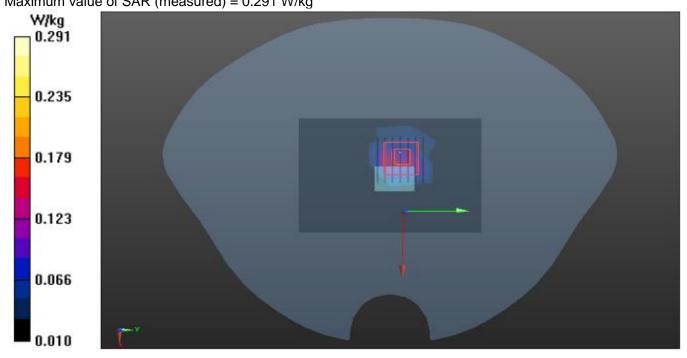
Maximum value of SAR (measured) = 0.162 W/kg

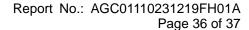
BODY/BACK-BLE-1M/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 5.058 V/m; Power Drift = 0.10 dB

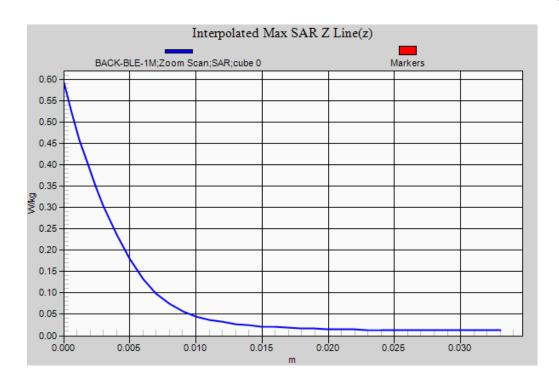
Peak SAR (extrapolated) = 0.592 W/kg

SAR(1 g) = 0.194 W/kg; SAR(10 g) = 0.067 W/kg Maximum value of SAR (measured) = 0.291 W/kg











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# APPENDIX C. TEST SETUP PHOTOGRAPHS

Refer to Attached files

# APPENDIX D. CALIBRATION DATA

Refer to Attached files.

----END OF REPORT----



# Conditions of Issuance of Test Reports

- 1. All samples and goods are accepted by the Attestation of Global Compliance (Shenzhen) Co., Ltd (the "Company") solely for testing and reporting in accordance with the following terms and conditions. The company provides its services on the basis that such terms and conditions constitute express agreement between the company and any person, firm or company requesting its services (the "Clients").
- 2. Any report issued by Company as a result of this application for testing services (the "Report") shall be issued in confidence to the Clients and the Report will be strictly treated as such by the Company. It may not be reproduced either in its entirety or in part and it may not be used for advertising or other unauthorized purposes without the written consent of the Company. The Clients to whom the Report is issued may, however, show or send it, or a certified copy thereof prepared by the Company to its customer, supplier or other persons directly concerned. The Company will not, without the consent of the Clients, enter into any discussion or correspondence with any third party concerning the contents of the Report, unless required by the relevant governmental authorities, laws or court orders.
- 3. The Company shall not be called or be liable to be called to give evidence or testimony on the Report in a court of law without its prior written consent, unless required by the relevant governmental authorities, laws or court orders.
- 4. In the event of the improper use of the report as determined by the Company, the Company reserves the right to withdraw it, and to adopt any other additional remedies which may be appropriate.
- 5. Samples submitted for testing are accepted on the understanding that the Report issued cannot form the basis of, or be the instrument for, any legal action against the Company.
- 6. The Company will not be liable for or accept responsibility for any loss or damage however arising from the use of information contained in any of its Reports or in any communication whatsoever about its said tests or investigations.
- 7.Clients wishing to use the Report in court proceedings or arbitration shall inform the Company to that effect prior to submitting the sample for testing.
- 8. The Company is not responsible for recalling the electronic version of the original report when any revision is made to them. The Client assumes the responsibility to providing the revised version to any interested party who uses them.
- 9. Subject to the variable length of retention time for test data and report stored hereinto as otherwise specifically required by individual accreditation authorities, the Company will only keep the supporting test data and information of the test report for a period of six years. The data and information will be disposed of after the aforementioned retention period has elapsed. Under no circumstances shall we provide any data and information which has been disposed of after retention period. Under no circumstances shall we be liable for damage of any kind, including (but not limited to) compensatory damages, lost profits, lost data, or any form of special, incidental, indirect, consequential or punitive damages of any kind, whether based on breach of contract of warranty, tort (including negligence), product liability or otherwise, even if we are informed in advance of the possibility of such damages.