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SPECIFIC ABSORPTION RATE (SAR) EVALUATION REPORT

Report No.: 23090494HKG-001

For Video Monitor - Parent Unit Model: VM934 PU, VM934-2 PU

Brand Name: vtech
FCC ID: EW780-3281-01
Branared for

Prepared for VTech Telecommunications Ltd. 23/F., Tai Ping Industrial Centre, Block 1,

57 Ting Kok Road, Tai Po, Hong Kong.

PREPARED AND CHECKED BY:

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Signed On File
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Date: December 12, 2023

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1. TEST RESULT SUMMARY

Applicant: VTech Telecommunications Ltd.

Applicant Address: 23/F., Tai Ping Industrial Centre, Block 1,

57 Ting Kok Road, Tai Po, Hong Kong.

Brand Name: vtech

Description of EUT:Video Monitor - Parent Unit
VM934 PU, VM934-2 PU

FCC ID: EW780-3281-01

Serial Number: N/A

Test Device: Production Unit

EUT Exercising Software: ComTestSerial Version 3.0.0.108

Exposure Category: General Population/Uncontrolled Exposure

Sample Receive Date: October 6, 2023

Date of Test: October 09, 2023 to October 12, 2023

Test Location: Workshop No. 3, G/F., World-Wide Industrial Centre,

43-47 Shan Mei Street, Fo Tan, Sha Tin,

N.T., Hong Kong SAR, China.

CAB Identifier: HKAP01

Environmental Conditions: Temperature: +18 to 25°C

Humidity 25 to 75%

Test Specification: ANSI/IEEE C95.1

IEEE Std 1528: 2013

FCC KDB Publication 447498 D01 v06 FCC KDB Publication 865664 D01 v01r04 FCC KDB Publication 865664 D02 v01r02

The maximum spatial peak SAR value for the sample device averaged over 1g was found to be:

| Rand | Operating Mode | TX Frequency (MHz) | Highest Reported SAR |
|---------------------|-----------------|---------------------|----------------------|
| Band Operating Mode | Operating widde | TA Frequency (WIRZ) | In-front-of mouth |
| 2.4GHz FHSS | Data | 2405 – 2475 | 0.14 W/kg |

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment / general population exposure limits specified in ANSI/IEEE C95.1.



2. GENERAL INFORMATION

2.1. Description of Equipment Under Test (EUT)

Manufacturer: VTech (Dongguan) Telecommunications Limited

Manufacturer Address: VTech Science Park, Xia Ling Bei Management Zone, Liaobu,

Dongguan, Guangdong, China.

Device Dimension (L x W): 165 (mm) x 92 (mm)

Device Thickness: 33 (mm)

Antenna Gain: 2dBi

Operating Configuration(s) /

Mode:

In-front-of mouth (Data)

Body (Data)

TX Frequency (MHz): 2405 - 2475MHz

Duty Cycle*: 9.7%

H/W Version: N/A

S/W Version: N/A

Battery Type: 3.6VDC 2600mAh Li-ion rechargeable Battery

Body-worn Accessories: N/A

Remark: The models VM934-2 PU are the same as the model VM934 in

hardware aspect. The difference in model number serves as marketing strategy as declared by client. The difference in model number represents different color and model number as declared

by client.

| Model Number | Remarks |
|--------------|---------------|
| VM934 PU | 1 Parent Unit |
| VM934-2 PU | 1 Parent Unit |

The production units are required to conform to the initial sample as received when the units are placed on the market.

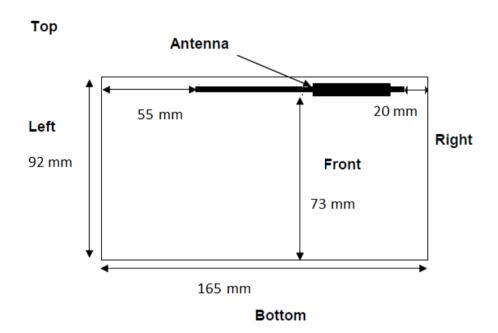
*Note:

1. Worst case was selected to present by client request. SAR test was tested and present in test mode with 100% to represent the worst case.



2.2. EUT Antenna Locations

Antenna Closed Configuration



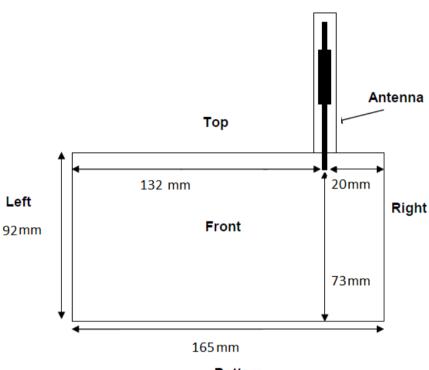
| Exposure Position | Separation Distance from the Antenna to the Outer Surface (Antenna Closed) |
|-------------------|--|
| Front | 12 |
| Тор | 0 |
| Left | 55 |
| Right | 20 |
| Back | 5 |
| Bottom | 73 |

Details of antenna specification are shown in separate antenna dimension document.



2.2. EUT Antenna Locations (Cont'd)

Antenna Extended Configuration



Bottom

| Exposure Position | Separation Distance from the Antenna to the Outer Surface (Antenna Extended) |
|-------------------|--|
| Front | 12 |
| Тор | 0 |
| Left | 132 |
| Right | 20 |
| Back | 5 |
| Bottom | 73 |

Details of antenna specification are shown in separate antenna dimension document.



2.3 Nominal and Maximum Output Power Specifications

The EUT operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498.

| | | TV Fraguency | Output Power | | |
|-------------|----------------|-----------------------|------------------|------------------|--|
| Band | Operating Mode | TX Frequency (MHz) | Nominal (dBm) | Maximum (dBm) | |
| 2.4GHz FHSS | Data | 2405 – 2475 | 15.23 | 17 | |



3. SAR MEASUREMENT SYSTEM DESCRIPTION

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 (ρ). The equation description is as below:

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

SAR is expressed in units of Watts per kilogram (W/Kg) SAR 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;
 ρ is the density of the tissue in kilograms per cubic metre;

b is the density of the tissue in knograms per cubic metre,

ch 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.



An SAR measurement system usually consists of a small diameter isotropic electric field probe, a multiple axis probe positioning system, a test device holder, one or more phantom models, the field probe instrumentation, a computer and other electronic equipment for controlling the probe and making the measurements. Other supporting equipment, such as a network analyzer, power meters and RF signal generators, are also required to measure the dielectric parameters of the simulated tissue media and to verify the measurement accuracy of the SAR system.

The SAR measurement system being used is COMOSAR system, which consists following items for performing compliance tests.

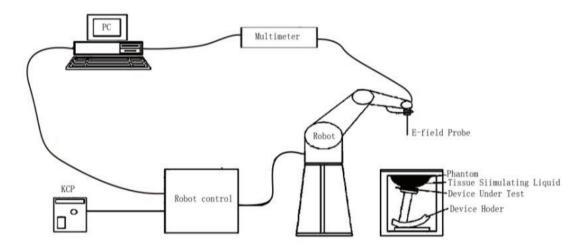


Figure 1: Schematic diagram of the SAR measurement system

- The PC. It controls most of the bench devices and stores measurement data. A computer running WinXP and the Opensar software.
- The E-Field probe. The probe is a 3-axis system made of 3 distinct dipoles. Each dipole returns a voltage in function of the ambient electric field.
- The Keithley multimeter measures each probe dipole voltages.
- The SAM phantom simulates a human head. The measurement of the electric field is made inside the phantom.
- The liquids simulate the dielectric properties of the human head tissues.
- The network emulator controls the mobile phone under test.
- The validation dipoles are used to measure a reference SAR. They are used to periodically check the bench to make sure that there is no drift of the system characteristics over time.
- The phantom, the device holder and other accessories according to the targeted measurement.



ROBOT

The COMOSAR system uses the KUKA robot from SATIMO SA (France). For the 6-axis controller COMOSAR system, the KUKA robot controller version from SATIMO 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





COMOSAR E-FIELD PROBE

The SAR measurement is conducted with the dissymmetric probe manufactured by SATIMO. The probe is specially designed and calibrated for use in liquid with high permittivity. The dissymmetric probe has special calibration in liquid at different frequency. SATIMO conducts the probe calibration in compliance with international and national standards (e.g. IEC/IEEE 62209-1528:2020 and relevant KDB files). The calibration data are in Appendix C.

Model SSE2

Manufacturer MVG

Frequency 0.45GHz-6GHz

Linearity:±0.08dB

Dynamic Range 0.01W/Kg-100W/Kg

Linearity:±0.08dB

Dimensions Overall length:330mm

Length of individual dipoles:2mm Maximum external diameter:8mm Probe Tip external diameter:2.5mm

Distance between dipoles/ probe extremity:1mm

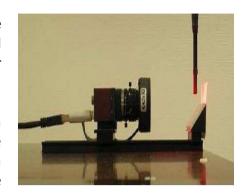


VIDEO POSITIONING SYSTEM

The video positioning system is used in OpenSAR to check the probe. Which is composed of a camera, LED, mirror and mechanical parts. The camera is piloted by the main computer with firewire link.

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 probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.





SAM TWIN PHANTOM

The SAM twin phantom is a fiberglass shell phantom with 2mm \pm 0.2 mm shell thickness (except the ear region where shell thickness increases to 6mm \pm 0.2 mm), relative permittivity $\epsilon r = 3.4$ and loss tangent $\delta = 0.02$. 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.



ELLIPTICAL PHANTOM

The elliptical phantom is a fiberglass shell phantom with

- 2mm ± 0.2 mm shell thickness
- relative permittivity εr = 3.4
- loss tangent $\delta = 0.02$

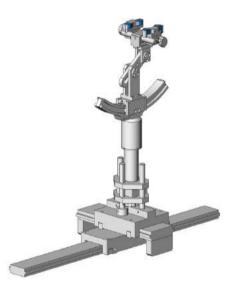


DEVICE HOLDER

The COMOSAR 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 COMOSAR device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon r=3.7$ and loss tangent $\delta=0.005.$ 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.





During measurement, the system first does an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom scanning area is greater than the projection of EUT and antenna.

Area Scan Parameters extracted from KDB 865664

| | ≤3 GHz | > 3 GHz | |
|--|--|---|--|
| Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface | 5 mm ± 1 mm | $\frac{1}{2} \cdot \delta \cdot \ln(2) \text{ mm} \pm 0.5 \text{ mm}$ | |
| 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 _{Area} , Δy _{Area} | 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. | | |

When the maximum SAR point has been found, the system will then carry out a zoom (3D) scan centered at that point to determine volume averaged SAR level.

Zoom Scan Parameters extracted from KDB 865664

| | | | | |
|---|---|---|--|--|
| Maximum zoom scan spatial resolution: Δx _{Zoom} , Δy _{Zoom} | | | \leq 2 GHz: \leq 8 mm 2 – 3 GHz: \leq 5 mm* | $3 - 4 \text{ GHz}$: $\leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz}$: $\leq 4 \text{ mm}^*$ |
| Maximum zoom scan spatial resolution, normal to | uniform grid: Δz _{Zoom} (n) | | ≤ 5 mm | 3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm |
| | graded | Δz _{Zoom} (1): between 1 st two points closest to phantom surface | ≤ 4 mm | 3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm |
| | Δz _{Zoom} (n>1): between subsequent points | | ≤ 1.5·∆z _{Zoo} | _{om} (n-1) mm |
| Minimum zoom scan volume | x, y, z | | ≥ 30 mm | 3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm |

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

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



4. TISSUE VERIFICATION

For SAR measurement of field distribution inside phantom, homogeneous tissue simulating liquid as below liquid recipes were filled to a depth of 15cm \pm 0.5cm for below 3GHz measurement and of 10cm \pm 0.5cm for above 3GHz.

HEAD TISSUE RECIPES

| | Ingredients | | | | | | |
|-----------|---------------------|------|--------------------|-------|-------|-------------|--|
| Frequency | De-ionized Water | Salt | 1,2 propanediol | DGBE | DGMH | Triton X100 | |
| 450 MHz | 33.5% | 3.4% | 63.1% | | | | |
| 750 MHz | 34.2% | 1.4% | 64.4% | | | | |
| 900 MHz | 35.3% | 1.0% | 63.7% | | | | |
| 1800 MHz | 55.2% | 0.6% | | 13.8% | | 30.4% | |
| 1900 MHz | 55.3% | 0.5% | | 13.8% | | 30.4% | |
| 2000 MHz | 55.3% | 0.4% | | 13.8% | | 30.5% | |
| 2450 MHz | 55.7% | 0.3% | | 18.7% | | 25.3% | |
| 5000 MHz | 65.3% | | | | 17.2% | 17.5% | |

BODY TISSUE RECIPES

| | Ingredients | | | | | | |
|-----------|---------------------|------|--------------------|------|-------|-------------|--|
| Frequency | De-ionized Water | Salt | 1,2 propanediol | DGBE | DGMH | Triton X100 | |
| 450 MHz | 52.4% | 1.9% | 45.7% | | | | |
| 750 MHz | 55.4% | 1.3% | 43.3% | | | | |
| 900 MHz | 52.9% | 1.0% | 46.1% | | | | |
| 1800 MHz | 70.8% | 0.5% | | 8.7% | | 20.0% | |
| 1900 MHz | 70.1% | 0.4% | | 8.9% | | 20.6% | |
| 2000 MHz | 70.2% | 0.3% | | 8.6% | | 20.9% | |
| 2450 MHz | 70.8% | 0.3% | | 8.7% | | 20.2% | |
| 5000 MHz | 77.8% | | | | 11.7% | 11.5% | |



The head tissue dielectric parameters recommended by the IEC/IEEE 62209-1528:2020 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. For other head and body tissue parameters, they are recommended by KDB 865664.

| Target Frequency | Н | lead | Во | ody |
|------------------|------|---------|------|---------|
| (MHz) | εr | σ (S/m) | εr | σ (S/m) |
| 300 | 45.3 | 0.87 | 58.2 | 0.92 |
| 450 | 43.5 | 0.87 | 56.7 | 0.94 |
| 835 | 41.5 | 0.90 | 55.2 | 0.97 |
| 900 | 41.5 | 0.97 | 55.0 | 1.05 |
| 915 | 41.5 | 1.01 | 55.0 | 1.06 |
| 1450 | 40.5 | 1.20 | 54.0 | 1.30 |
| 1610 | 40.3 | 1.29 | 53.8 | 1.40 |
| 1800 – 2000 | 40.0 | 1.40 | 53.3 | 1.52 |
| 2450 | 39.2 | 1.80 | 52.7 | 1.95 |
| 3000 | 38.5 | 2.40 | 52.0 | 2.73 |
| 5800 | 35.3 | 5.27 | 48.2 | 6.00 |

($\varepsilon r = relative permittivity, \sigma = conductivity and \rho = 1000 kg/m3)$

When a transmission band overlaps with one of the target frequencies, the tissue dielectric parameters of the tissue medium at the middle of a device transmission band should be within ±5% of the parameters specified at that target frequency.



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

The dielectric parameters were:

Head Liquid

| Freq. | Temp. | ε _r / Rela | ative Permi | ittivity | σ/ | ρ | | |
|-------|-------|-----------------------|-------------|----------|----------|---------|---------|-----------|
| (MHz) | (°C) | Measured | Target* | Δ (±5%) | Measured | Target* | Δ (±5%) | **(kg/m³) |
| 2450 | 22.7 | 38.6 | 39.2 | -1.53 | 1.74 | 1.8 | -3.33 | 1000 |

^{*} Target values refer to KDB 865664

Note:

1. Date of tissue verification measurement: 12 October, 2023.

2. Ambient temperature: 22.7 deg C.

3. The temperature condition is within +/- 2 deg. C during the SAR measurements.

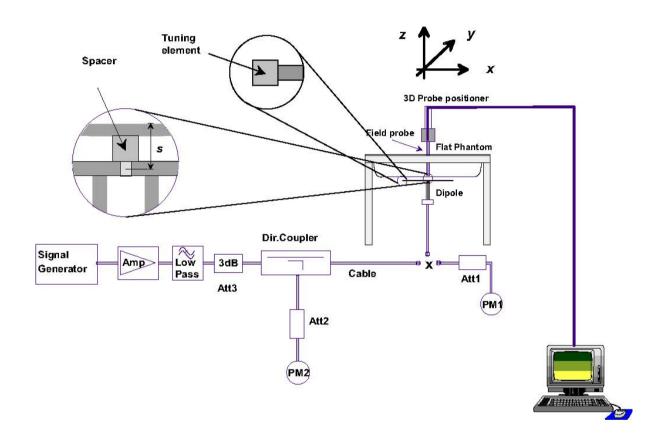
^{**} Worst-case assumption



5. SAR MEASUREMENT SYSTEM VERIFICATION

Each SATIMO system is equipped with one or more system check kits. These units, together with the predefined measurement procedures within the SATIMO software, enable user to conduct the system check. 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.





VALIDATION DIPOLE



The dipoles used is based on the IEC/IEEE 62209-1528:2020, and is complied with mechanical and electrical specifications in line with the requirements of both FCC and KDB requirement.

SYSTEM CHECK RESULTS

| 0.0 | | | | | | | | | |
|------------------------|---------------------|----------------|------------------|------------------------------|---------------------------------|-----------------------------------|---|---------------------|--|
| | System Verification | | | | | | | | |
| Date | Freq. (MHz) | Liquid Type | System Dipole | Serial No. | Target SAR _{1g} (W/kg) | Measured SAR _{1g} (W/kg) | Normalized SAR _{1g} (W/kg) | Deviation (±10%) | |
| 12 October, 2023 | 2450 | Head | 2450MHz | SN 22/16 DIP 2G450-411 | 53.37 | 5.29 | 52.81 | -1.05 | |

^{*} The target was quoted from dipole calibration report

SAR_{1g} ambient measured value < 12 mW/kg

Details of System Verification plot is shown in the Appendix A - plot 1.

^{*} Input power level = 20dBm (0.1W)



6. SAR EVALUATION

6.1. Device Test Positions Relative to the Head

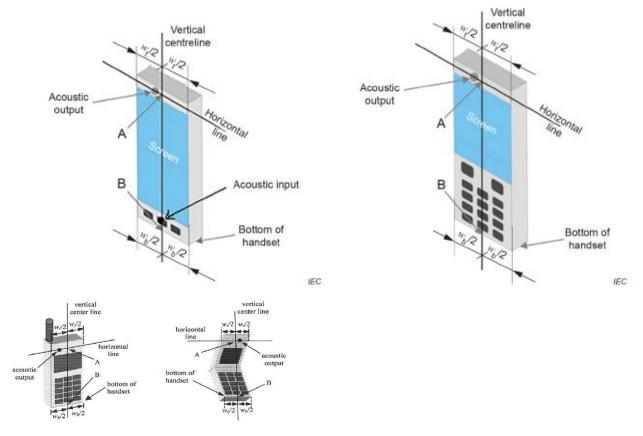
This practice specifies two handset test positions against the head phantom—the "cheek" position and the "tilt" position. These two test positions are defined in the following subclauses. The handset should be tested in both positions on left and right sides of the SAM phantom. If handset construction is such that the handset positioning procedures described below to represent normal use conditions cannot be used, e.g., some asymmetric handsets, alternative alignment procedures should be adapted with all details provided in the test report. These alternative procedures should replicate intended use conditions as closely as possible according to the intent of the procedures described in this subclause.



DEFINITION OF THE CHEEK POSITION

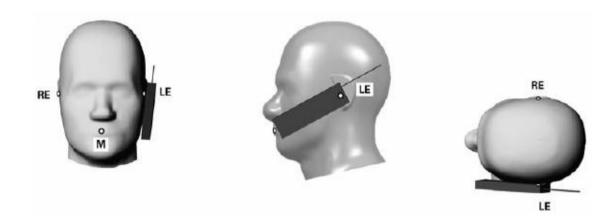
The cheek position is established as follows:

- 1. Ready the handset for talk operation, if necessary. For example, for handsets with a cover piece (flip cover), open the cover. If the handset can transmit with the cover closed, both configurations must be tested.
- 2. Define two imaginary lines on the handset—the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset—the midpoint of the width wt of the handset at the level of the acoustic output (point A in below figure), and the midpoint of the width wb of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see below left figure). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see right figure), especially for clamshell handsets, handsets with flip covers, and other irregularly-shaped handsets.
- 3. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see the figure as next page), such that the plane defined by the vertical centerline and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.
- 4. Translate the handset towards the phantom along the line passing through RE and LE until handset point A touches the pinna at the ERP.





- 5. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to the plane containing B-M and N-F lines, i.e., the Reference Plane.
- 6. Rotate the handset around the vertical centerline until the handset (horizontal line) is parallel to the N-F line.
- 7. While maintaining the vertical centerline in the Reference Plane, keeping point A on the line passing through RE and LE, and maintaining the handset contact with the pinna, rotate the handset about the N-F line until any point on the handset is in contact with a phantom point below the pinna on the cheek.





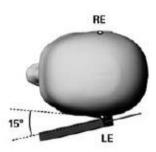
DEFINITION OF THE TILT POSITION

The tilt position is established as follows:

- 1. Repeat steps to place the device in the cheek position.
- 2. While maintaining the orientation of the handset, move the handset away from the pinna along the line passing through RE and LE far enough to allow a rotation of the handset away from the cheek by 15°.
- 3. Rotate the handset around the horizontal line by 15°.
- 4. While maintaining the orientation of the handset, move the handset towards the phantom on the line passing through RE and LE until any part of the handset touches the ear. The tilt position is obtained when the contact point is on the pinna. See the figure as below. If contact occurs at any location other than the pinna, e.g., the antenna at the back of the phantom head, the angle of the handset should be reduced.
- 5. In this case, the tilt position is obtained if any point on the handset is in contact with the pinna and a second point on the handset is in contact with the phantom, e.g., the antenna with the back of the head.









6.2. Device test positions relative to body-worn accessory

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

SAR evaluation is required for body-worn accessories supplied with the host device. The test configurations must be conservative for supporting the body-worn accessory use conditions expected by users. Body-worn accessories that do not contain metallic or conductive components may be tested according to worst-case exposure configurations, typically according to the smallest test separation distance required for the group of body-worn accessories with similar operating and exposure characteristics. All body-worn accessories containing metallic components, either supplied with the product or available as an option from the device manufacturer, must be tested in conjunction with the host device to demonstrate compliance

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



6.3. Device test positions relative to Body-supported device

Per IEC/IEEE 62209-1528: 2020, a typical example of a body supported device is a wireless enabled laptop device that among other orientations may be supported on the thighs of a sitting user. To represent this orientation, the device shall be positioned with its base against the flat phantom. Other orientations may be specified by the manufacturer in the user instructions. If the intended use is not specified, the device shall be tested directly against the flat phantom in all usable orientations.

Devices that fall into this category include tablet type portable computers and credit card transaction authorization terminals, point-of-sale and/or inventory terminals. Where these devices may be torso or limb-supported, the same principles for body-supported devices are applied.

The example in Figure a) shows a tablet form factor portable computer for which SAR should be separately assessed with each surface and the separation distances positioned against the flat phantom that correspond to the intended use as specified by the manufacturer. If the intended use is not specified in the user instructions, the device shall be tested directly against the flat phantom in all usable orientations.

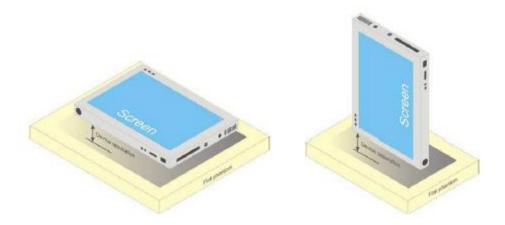


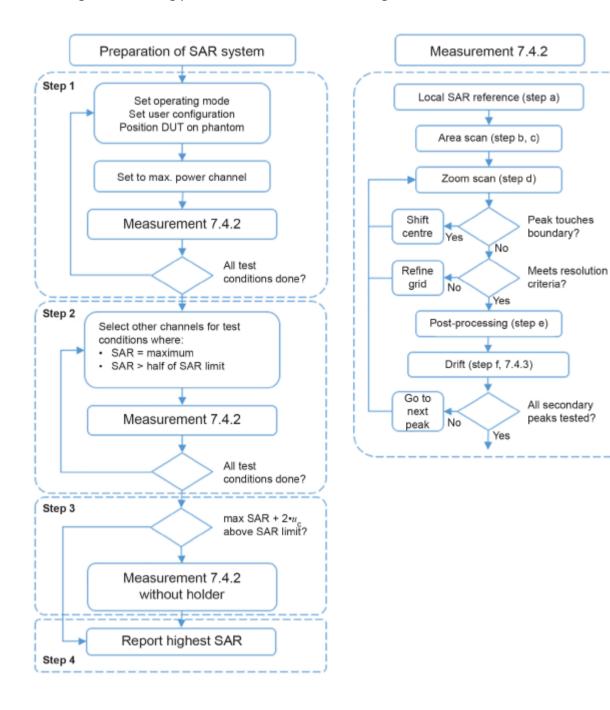
Figure a) – Tablet form factor portable computer

IEC



TEST REPORT

A block diagram of testing procedure is shown as below figure.



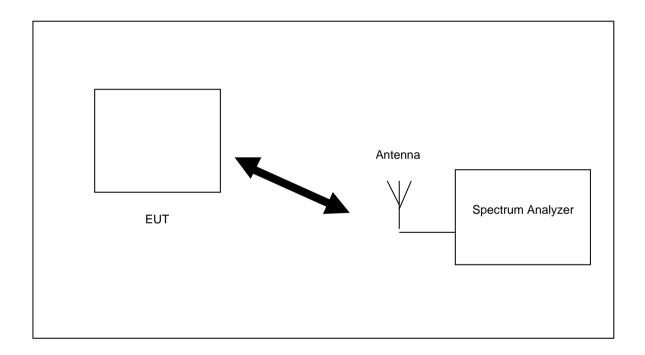


6.4. General Device Setup

The device was first charged on a charger over a duration defined by the applicant to make sure the installed battery was fully charged.

The device was then placed into test mode to simulate the worst case configuration through the highest power channel, where the operating parameters established in this test mode is identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters. The test frequency is corresponded to actual channel frequencies defined for domestic use.

During testing, the device was evaluated with a fully charged battery, power saving function disabled and was configured to operate at maximum output power. A receive antenna and a spectrum analyzer were placed with a distance > 50cm away from the device to monitor the transmission states.





6.5. RF Output Power Measurements

| Frequency | Channel | Duty Cycle | Maximum Tune-up Power (dBm) | Measured Conducted Power (Peak) (dBm) | Measured Conducted Power (Time Average) (dBm) |
|-----------|---------|------------|-----------------------------------|--|---|
| 2405 | 1 | | 17 | 16.89 | 6.8 |
| 2439 | 17 | 9.7% | 16 | 15.23 | 5.1 |
| 2475 | 32 | _ | 16 | 15.58 | 5.4 |

Note:

- 1. Time Average power (dBm) = Peak power (dBm) + Time Average factor.
- 2. Time Average factor = 10*log(duty cycle)
- 3. Per KDB 447498, the tested device was within the specified tune-up tolerances range, but not more than 2dB lower than the maximum tune-up tolerance limit.
- 4. Per KDB 447498, when antenna port was not available on the device to support conducted power measurement and test software was used to establish transmitter power levels, the power level was verified separately according to design and component specifications and product development information specified by the manufacturer.



6.6. SAR Test Exclusion Consideration for Adjacent Edges

The Exemption limits for Routine Evaluation – SAR Evaluation in KDB 447498 can be applied to determine SAR test exclusion for adjacent edge configurations.

The test separation distance for SAR test exclusion of adjacent edges is determined by the closest distance between the antenna and outer housing on the adjacent edge of the device.

According to the antenna to outer housing separation distance and maximum time-averaged output power as below, SAR evaluation of **top**, **left**, **right**, **back and bottom** edges are not required. However, client optional decided to keep Front position for data evaluation.

| Exposure Position | Antenna to Outer Housing Separation Distance | SAR Exemption Limit | Maximum Time- Averaged Conducted Power | SAR Exclusion Result |
|----------------------------|--|------------------------|---|----------------------------|
| Front | 12 mm | 23 mW | _ | Test required ¹ |
| Тор | 0 mm | 9.6 mW | _ | Excluded |
| Top (antenna extended) | 0 mm | 9.6 mW | | Excluded |
| Left | 55 mm | >96 mW | 4.70 | Excluded |
| Left (antenna extended) | 132 mm | >96 mW | - 4.79 mW | Excluded |
| Right | 20 mm | 38 mW | _ | Excluded |
| Back | 5 mm | 9.6 mW | _ | Excluded |
| Bottom | 73 mm | >96 mW | | Excluded |

Note:

1. Client optional decided to keep Front position for data evaluation.



6.7. Exposure Conditions

In-Front-of Mouth Exposure Conditions

| Test Configurations | Distance to Phantom | Operation Mode | SAR Required | Note |
|----------------------|------------------------|-------------------|------------------|------|
| Front 0mm Separation | Closed | Data | Yes ¹ | |
| Front 0mm Separation | Extended | Data | Yes ¹ | |

Note:

- 1. Client optional decided to keep Front position for data evaluation.
- 2. Per KDB 447498 D01, SAR Evaluation can be applied to determine SAR test exclusion for adjacent edge configuration.

Body Exposure Conditions

| Test Configurations | Distance to Phantom | Operation Mode | SAR Required | Note |
|------------------------------|------------------------|-------------------|------------------|----------------------------|
| Front 0mm Separation | Closed | Data | Yes ¹ | |
| Top 0mm Separation | Closed | Data | No | SAR test exclusion applied |
| Left 0mm Separation | Closed | Data | No | SAR test exclusion applied |
| Right 0mm Separation | Closed | Data | No | SAR test exclusion applied |
| Back 0mm Separation | Closed | Data | No | SAR test exclusion applied |
| Bottom Omm Separation | Closed | Data | No | SAR test exclusion applied |
| Front 0mm Separation | Extended | Data | No | SAR test exclusion applied |
| Top 0mm Separation | Extended | Data | No | SAR test exclusion applied |
| Left 0mm Separation | Extended | Data | No | SAR test exclusion applied |
| Right 0mm Separation | Extended | Data | No | SAR test exclusion applied |
| Back 0mm Separation | Extended | Data | No | SAR test exclusion applied |
| Bottom 0mm Separation | Extended | Data | No | SAR test exclusion applied |

Note:

- 1. Client optional decided to keep the Front position for data evaluation.
- 2. Per KDB 447498 D01, SAR Evaluation can be applied to determine SAR test exclusion for adjacent edge configuration.



6.8. Test Result

The results on the following page(s) were obtained when the device was tested in the condition described in this report. Detailed measurement data and plots, which reveal information about the location of the maximum SAR with respect to the device, are reported in Appendix B.

In-Front-of Mouth SAR

| | Measurement Result Maximum | | | | | | | | | | |
|------|-----------------------------|---------|------|------------------------------------|---------------------------|----------------------------|---------------------|--|-------------------|---|------|
| Chan | Freq. (MHz) | Battery | Mode | Test Position | Allowed Power (dBm) | Measured Power (dBm) | SAR Drift (%) | Measure d SAR _{1g} (W/kg) | Scaling factor | Reported SAR _{1g} (W/kg) | Plot |
| 17 | 2439 | 3.7V | Data | Front 0mm | 16 | 15.23 | 1.67 | 0.038 | 1.19 | 0.05 | |
| 17 | 2439 | 3.7V | Data | Front 0mm (antenna extended) | 16 | 15.23 | 0.76 | 0.121 | 1.19 | 0.14 | 1 |
| 1 | 2405 | 3.7V | Data | Front Omm(antenna extended) | 17 | 16.89 | -2.64 | 0.124 | 1.03 | 0.13 | |
| 32 | 2475 | 3.7V | Data | Front 0mm (antenna extended) | 16 | 15.58 | -0.46 | 0.116 | 1.10 | 0.13 | |

Note:

- 1. Fully charged batteries were used at the beginning of each SAR measurement.
- 2. There was no power reduction used for any band/mode implemented in this device.
- 3. Reported SAR results were scaled to the maximum allowed power with the scaling factor equation -10^[(Maximum power measured power) / 10].
- 4. Per KDB 447498 D01, if the reported SAR value was \leq 0.8 W/kg and the transmission band was \leq 100MHz, SAR testing was not required for the other test channels in the band.
- 5. Per KDB 865664 D01, repeated measurement was not required when the original highest measured SAR was < 0.8W/kg.



6.9. SAR Limits

The following FCC limits (Std. C95.1-1992) for SAR apply to devices operate in General Population/Uncontrolled Exposure and Controlled environment:

GENERAL POPULATION / UNCONTROLLED ENVIRONMENTS:

Defined as location where there is the exposure of individuals who have no knowledge or control of their exposure.

| EXPOSURE | SAR |
|--|--------|
| (General Population/Uncontrolled Exposure environment) | (W/kg) |
| Spatial Peak SAR (Head)* | 1.60 |
| Spatial Peak SAR (Partial Body)* | 1.60 |
| Spatial Peak SAR (Whole Body)* | 0.08 |
| Spatial Peak SAR (Hands / Wrists / Feet / Ankles)** | 4.00 |

OCCUPATIONAL / CONTROLLED ENVIRONMENTS:

Defined as location where there is the exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation)

| EXPOSURE (Occupational/Controlled Exposure environment) | SAR (W/kg) |
|---|---------------|
| Spatial Peak SAR (Head)* | 8.00 |
| Spatial Peak SAR (Partial Body)* | 8.00 |
| Spatial Peak SAR (Whole Body)* | 0.40 |
| Spatial Peak SAR (Hands / Wrists / Feet / Ankles)** | 20.00 |

Notes:

- * The Spatial Peak value of the SAR averaged over any 1 gram of tissue.
 (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time
- ** The Spatial Peak value of the SAR averaged over any 10 gram of tissue.

 (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time



7. TEST EQUIPMENT LIST

| Equipment | Registration No. | Manufacturer | Model No. | Calibration | Calibration |
|---|------------------|----------------------|--|----------------|------------------------|
| SAR System | EW-3211 | MVG | SATIMO System (OpenSAR Software V4 02 34) | N/A | Due Date N/A |
| Phantom | EW-3211 | SATIMO | COMOSAR SAM PHANTOM | N/A | N/A |
| SAR Probe | EW-3210 | MVG | SSE2 (SN 05/23 EPGO402) | 14 Feb 2023 | 14 Feb 2024 |
| SAR Dipole | EW-3212 | MVG | SN 22/16 DIP2G450-411 | 14 Feb 2023 | 14 Feb 2024 |
| Dielectric Probe for SAR Test | EW-3213 | MVG | Liquid Measurement Kit (SN 24/16 OCPG 76) | 14 Feb 2023 | 14 Feb 2024 |
| Head Liquid Tissue | N/A | MVG | Head Liquid 2450MHz | Refer to Secti | on 4 |
| Body Liquid Tissue | N/A | MVG | Body Liquid 2450MHz | Refer to Secti | on 4 |
| Network Analyzer | EW-3192 | Rhode & Schwarz | ZVL6 | 20 Dec 2022 | 20 Dec 2023 |
| Plastic Ruler | EW-3084 | MUJI | 30cm | 23 Jan 2023 | 23 Jan 2024 |
| Signal and Spectrum Analyzer (10Hz to 40GHz) | EW-3016 | Rhode & Schwarz | FSV40 | 4 Sept 2022 | 4 Sept 2025 |
| Precision Dual Coupler (0.8- 3GHz 20dB) | EW-3184 | VectaWave USA | VDC0830-20 | 19 Sept 2023 | 19 Sept 2024 |
| Wideband powe sensor 2 pcs 50MHz to 18GHz | | ROHDESCHWA RZ | NRP-Z81 | 14 Feb 2023 | 14 Feb 2024 |
| SAR Amplifier | EW-3275 | MVG | 0.4-6GHz | 4 Sept 2023 | 4 Sept 2024 |
| Thermo- HyGrometer | EW-3046 | Oregon Scientific | THG312 | 7 Sept 2023 | 4 Sept 2024 |
| Digital Thermo- Meter For SAR test | EW-2901 | TES | 1306 | 28 Aug 2023 | 28 Aug 2024 |



8. MEASUREMENT UNCERTAINTY

Per FCC KDB 865884, the extensive SAR measurement uncertainty analysis was not required when the highest measured SAR was < 1.5W/kg for all frequency band.



TABLE 1 EXPOSURE ASSESSMENT UNCERTAINTY FOR HEAD SAR

| | Tol. | Prob. | | C _I | C _I | 1 g | 10 g | |
|-------------------------------------|-------|-------|------|----------------|----------------|-------|-------|----|
| | (± %) | Dist. | Div. | (1 g) | (10 g) | ui | ui | |
| Uncertainty Component | ,, | | | (1.8) | (10 9) | (± %) | (± %) | νį |
| Measurement System | | | | | | | | |
| Probe Calibration | 5.8 | N | 1 | 1 | 1 | 5.8 | 5.8 | 3 |
| Axial Isotropy | 3.5 | R | √3 | √n.5 | √0.5 | 1.43 | 1.43 | 8 |
| Hemispherical Isotropy | 5.9 | R | 40 | √0.5 | √0.5 | 2.41 | 2.41 | * |
| Boundary Effect | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | 8 |
| Linearity | 4.7 | R | √3 | 1 | 1 | 2.71 | 2.71 | ٠ |
| System Detection Limits | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | |
| Modulation response | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | 8 |
| Readout Electronics | 0.5 | N | 1 | 1 | 1 | 0.50 | 0.50 | 3 |
| Response Time | 0 | R | √3 | 1 | 1 | 0.00 | 0.00 | 8 |
| Integration Time | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | 8 |
| RF Ambient Conditions - Noise | 3 | К | √3 | 1 | 1 | 1./3 | 1./3 | 8 |
| RF Ambient Conditions Reflections | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | 3 |
| Probe Positioner Mechanical | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | |
| Tolerance | 1.4 | I K | 73 | ' | ' | 0.61 | 0.61 | |
| Probe Positioning with respect to | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | 8 |
| Phantom Shell | 1.4 | " | 73 | ' | ' | 0.81 | 0.81 | |
| Extrapolation, interpolation and | | | | | | | | |
| Integration Algorithms for Max. SAR | 2.3 | R | √3 | 1 | 1 | 1.33 | 1.33 | 00 |
| Evaluation | | | | | | | | |
| Test sample Related | | | | | | | | |
| Test Sample Positioning | 2.6 | M | 1 | 1 | 1 | 2.60 | 2.60 | 11 |
| Device Holder Uncertainty | 3 | N | 1 | 1 | 1 | 3.00 | 3.00 | 7 |
| Output Power Variation - SAR drift | _ | | ٠,١٥ | , | · . | 2.00 | 2.00 | 8 |
| measurement | 5 | R | √3 | 1 | 1 | 2.89 | 2.89 | |
| SAR scaling | 2 | К | √3 | 1 | 1 | 1.15 | 1.15 | 8 |
| Phantom and Tissue Parameters | | | | | | | | |
| Phantom Shell Uncertainty - Shape, | 4 | R | √3 | 1 | 1 | 2.31 | 2.31 | |
| Thickness and Permittivity | 4 | " | 73 | ' | ' | 2.31 | 2.31 | m |
| Uncertainty in SAR correction for | | | | | | | | |
| deviation in permittivity and | 2 | N | 1 | 1 | 0.84 | 2.00 | 1.68 | 00 |
| conductivity | | | | | | | | |
| Liquid Conductivity Measurement | 4 | N | 1 | U.78 | U./1 | 3.12 | 2.84 | 5 |
| Liquid Permittivity Measurement | 5 | N | 1 | 0.23 | 0.26 | 1.15 | 1.30 | 5 |
| Liquid Conductivity - Temperature | 2.5 | | √3 | 0.70 | 0.74 | 4.40 | 4.00 | |
| Uncertainty | 2.5 | R | ٧೨ | 0.78 | 0.71 | 1.13 | 1.02 | |
| Liquid Permittivity - Temperature | 2.5 | Г | √3 | 0.22 | 0.00 | 0.22 | 0.00 | 8 |
| Uncertainty | 2.5 | R | 73 | 0.23 | 0.26 | 0.33 | 0.38 | |
| Combined Standard Uncertainty | | RSS | | | | 10.47 | 10.34 | |
| Expanded Uncertainty | | l , | | | | 20.05 | 20.00 | |
| (95% CONFIDENCE INTERVAL) | | k | | | | 20.95 | 20.69 | |



TABLE 2 SYSTEM VALIDATION FOR HEAD LIQUID

| Uncertainty Component | Tol. (± %) | Prob. Dist. | Div. | c _i (1 g) | c _i (10 g) | 1 g u _i (± %) | 10 g u _i (± %) | ٧į |
|-------------------------------------|---------------|----------------|------|-------------------------|--------------------------|--------------------------------|---------------------------------|----|
| Measurement System | | | | | | | | |
| Probe Calibration | 5.8 | N | 1 | 1 | 1 | 5.80 | 5.80 | |
| Axial Isotropy | 3.5 | R | √3 | 1 | 1 | 2.02 | 2.02 | |
| Hemispherical Isotropy | 5.9 | R | √3 | 0 | 0 | 0.00 | 0.00 | |
| Boundary Effect | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | 00 |
| Linearity | 4.7 | R | √3 | 1 | 1 | 2.71 | 2.71 | |
| System Detection Limits | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | |
| Modulation response | 0 | N | √3 | 0 | 0 | 0.00 | 0.00 | |
| Readout Electronics | 0.5 | N | 1 | 1 | 1 | 0.50 | 0.50 | |
| Response Time | 0 | R | √3 | 0 | 0 | 0.00 | 0.00 | 00 |
| Integration Time | 1.4 | R | √3 | 0 | 0 | 0.00 | 0.00 | |
| RF Ambient Conditions - Noise | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | |
| RF Ambient Conditions - Reflections | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | 00 |
| Probe Positioner Mechanical | | | | | | | | |
| Tolerance | 1.4 | R | √3 | 1 | 1 1 | 0.81 | 0.81 | 00 |
| Probe Positioning with respect to | | | | - | - | | | |
| Phantom Shell | 1.4 | R | √3 | 1 | 1 1 | 0.81 | 0.81 | 00 |
| Extrapolation, interpolation and | | | | | | | | |
| Integration Algorithms for Max. SAR | 2.3 | | | | | | | |
| Evaluation | | R | √3 | 1 | 1 1 | 1.33 | 1.33 | |
| Dipole | | | | | | | | |
| Deviation of experimental source | | | | | | | | |
| from numerical source | 5 | N | 1 | 1 | 1 | 5.00 | 5.00 | 00 |
| Input Power and SAR drift | | | | | | | | |
| measurement | 0.5 | R | √3 | 1 | 1 | 0.29 | 0.29 | |
| Dipole Axis to Liquid Distance | 2 | R | √3 | 1 | 1 | 1.15 | 1.15 | |
| Phantom and Tissue Parameters | | | | | | | | |
| Phantom Shell Uncertainty - | | | | | | | | |
| Thickness and Permittivity | 4 | R | √3 | 1 | 1 | 2.31 | 2.31 | 00 |
| Uncertainty in SAR correction for | | | | | | | | |
| deviation in permittivity and | 2 | N | 1 | 1 | 0.84 | 2.00 | 1.68 | 00 |
| conductivity | | | | | | | | |
| Liquid Conductivity Measurement | 4 | N | 1 | 0.78 | 0.71 | 3.12 | 2.84 | 5 |
| Liquid Permittivity Measurement | 5 | N | 1 | 0.23 | 0.26 | 1.15 | 1.30 | 5 |
| Liquid Conductivity - Temperature | | | | | | | | |
| Uncertainty | 2.5 | R | √3 | 0.78 | 0.71 | 1.13 | 1.02 | 00 |
| Liquid Permittivity - Temperature | 2.5 | | | 0.00 | 0.00 | | | |
| Uncertainty | 2.5 | R | √3 | 0.23 | 0.26 | 0.33 | 0.38 | 00 |
| Combined Standard Uncertainty | | RSS | | | | 10.16 | 10.03 | |
| Expanded Uncertainty | | | | | | | | |
| (95% CONFIDENCE INTERVAL) | | k | | | | 20.32 | 20.06 | |



TABLE 3 EXPOSURE ASSESSMENT UNCERTAINTY FOR BODY SAR

| | Tol. | Prob. | | | | 1 y | 10 y | |
|--|--------|-------|----------|-------|--------|-------|-------|----------------|
| | (± %) | Dist. | Div. | Cl | (40 -) | ui | ui | |
| Uncertainty Component | (± 70) | DIST. | | (1 g) | (10 g) | (± %) | (± %) | ν _i |
| Measurement System | | | | | | | · ` · | |
| Probe Calibration | 5.8 | N | 1 | 1 | 1 | 5.8 | 5.8 | w |
| Axial Isotropy | 3.5 | R | √3 | √0.5 | √0.5 | 1.43 | 1.43 | 8 |
| Hemispherical Isotropy | 5.9 | R | 4 | √0.5 | √0.5 | 2.41 | 2.41 | |
| Boundary Effect | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | 00 |
| Linearity | 4.7 | R | γ̈́3 | 1 | 1 | 2.71 | 2.71 | |
| System Detection Limits | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | 8 |
| Modulation response | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | |
| Readout Electronics | 0.5 | N | 1 | 1 | 1 | 0.50 | 0.50 | 3 |
| Response Time | 0 | R | √3 | 1 | 1 | 0.00 | 0.00 | |
| Integration Time | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | ** |
| RF Ambient Conditions - Noise | 3 | К | √3 | 1 | 1 | 1./3 | 1.73 | 00 |
| RF Ambient Conditions Reflections | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | 3 |
| Probe Positioner Mechanical | 4.4 | | √3 | 4 | | 0.04 | 0.04 | |
| Tolerance | 1.4 | R | 73 | 1 | 1 | 0.81 | 0.81 | 00 |
| Probe Positioning with respect to | 4.4 | | <i>b</i> | 4 | | 0.04 | 0.04 | |
| Phantom Shell | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | 00 |
| Extrapolation, interpolation and | | | | | | | | |
| Integration Algorithms for Max. SAR | 2.3 | R | √3 | 1 | 1 1 | 1.33 | 1.33 | |
| Evaluation | | | | | | | | |
| Test sample Related | | | | | | | | |
| Test Sample Positioning | 2.6 | N | 1 | 1 | 1 | 2.60 | 2.60 | 11 |
| Device Holder Uncertainty | 3 | N | 1 | 1 | 1 | 3.00 | 3.00 | 7 |
| Output Power Variation - SAR drift | 5 | _ | √3 | 1 | , | 2.00 | 2.00 | |
| measurement | 5 | R | .42 | | 1 | 2.89 | 2.89 | |
| SAR scaling | 2 | К | √3 | 1 | 1 | 1.15 | 1.15 | 00 |
| Phantom and Tissue Parameters | | | | | | | | |
| Phantom Shell Uncertainty - Shape, Thickness and Permittivity | 4 | R | √3 | 1 | 1 | 2.31 | 2.31 | 3 |
| Uncertainty in SAR correction for | | | | | | | | |
| deviation in permittivity and | 2 | N | 1 | 1 | 0.84 | 2.00 | 1.68 | |
| conductivity | - | '* | ' | ' | 0.04 | 2.00 | 1.00 | |
| Liquid Conductivity Measurement | 4 | N | 1 | U./8 | U./1 | 3.12 | 2.84 | 5 |
| Liquid Permittivity Measurement | 5 | N | 1 | 0.23 | 0.26 | 1.15 | 1.30 | 5 |
| Liquid Conductivity - Temperature | | | | | | | | |
| Uncertainty | 2.5 | R | √3 | 0.78 | 0.71 | 1.13 | 1.02 | ~ |
| Liquid Permittivitγ - Temperature | | | | | | | | |
| Uncertainty | 2.5 | R | √3 | 0.23 | 0.26 | 0.33 | 0.38 | 00 |
| Combined Standard Uncertainty | | RSS | | | | 10.47 | 10.34 | |
| Expanded Uncertainty | | | | | | | | |
| (95% CONFIDENCE INTERVAL) | | k | l | l | I | 20.95 | 20.69 | |



TABLE 4 SYSTEM VALIDATION FOR BODY LIQUID

| | Tol. | Prob. | | Ci | Ci | 1 g | 10 g | |
|-------------------------------------|-------|-------|------|-------|--------|-------|-------|----|
| | (± %) | Dist. | Div. | (1 g) | (10 g) | Ui | Ui | |
| Uncertainty Component | (, | | | (1.9) | (10 9) | (± %) | (± %) | ٧į |
| Measurement System | | | | | | | | |
| Probe Calibration | 5.8 | N | 1 | 1 | 1 | 5.80 | 5.80 | |
| Axial Isotropy | 3.5 | R | √3 | 1 | 1 | 2.02 | 2.02 | |
| Hemispherical Isotropy | 5.9 | R | √3 | 0 | 0 | 0.00 | 0.00 | |
| Boundary Effect | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | |
| Linearity | 4.7 | R | √3 | 1 | 1 | 2.71 | 2.71 | |
| System Detection Limits | 1 | R | √3 | 1 | 1 | 0.58 | 0.58 | |
| Modulation response | 0 | N | √3 | 0 | 0 | 0.00 | 0.00 | |
| Readout Electronics | 0.5 | N | 1 | 1 | 1 | 0.50 | 0.50 | |
| Response Time | 0 | R | √3 | 0 | 0 | 0.00 | 0.00 | 00 |
| Integration Time | 1.4 | R | √3 | 0 | 0 | 0.00 | 0.00 | 00 |
| RF Ambient Conditions - Noise | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | 0 |
| RF Ambient Conditions - Reflections | 3 | R | √3 | 1 | 1 | 1.73 | 1.73 | |
| Probe Positioner Mechanical | 1.4 | | | | | | | |
| Tolerance | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | 00 |
| Probe Positioning with respect to | 1.4 | | | | | | | |
| Phantom Shell | 1.4 | R | √3 | 1 | 1 | 0.81 | 0.81 | 00 |
| Extrapolation, interpolation and | | | | | | | | |
| Integration Algorithms for Max. SAR | 2.3 | | | | | | | |
| Evaluation | | R | √3 | 1 | 1 | 1.33 | 1.33 | 00 |
| Dipole | | | | | | | | |
| Deviation of experimental source | | | 1 | 1 | 1 | | | |
| from numerical source | 5 | N | ' | ' | ' | 5.00 | 5.00 | 00 |
| Input Power and SAR drift | | | | | | | | |
| measurement | 0.5 | R | √3 | 1 | 1 | 0.29 | 0.29 | 00 |
| Dipole Axis to Liquid Distance | 2 | R | √3 | 1 | 1 | 1.15 | 1.15 | |
| Phantom and Tissue Parameters | | | | | • | | | |
| Phantom Shell Uncertainty - | 4 | | | | | | | |
| Thickness and Permittivity | 4 | R | √3 | 1 | 1 | 2.31 | 2.31 | 00 |
| Uncertainty in SAR correction for | | | | | | | | |
| deviation in permittivity and | 2 | N | 1 | 1 | 0.84 | 2.00 | 1.68 | 00 |
| conductivity | | | | | | | | |
| Liquid Conductivity Measurement | 4 | N | 1 | 0.78 | 0.71 | 3.12 | 2.84 | 5 |
| Liquid Permittivity Measurement | 5 | N | 1 | 0.23 | 0.26 | 1.15 | 1.30 | 5 |
| Liquid Conductivity - Temperature | 2.5 | | | 0.70 | | | | |
| Uncertainty | 2.5 | R | √3 | 0.78 | 0.71 | 1.13 | 1.02 | 00 |
| Liquid Permittivity - Temperature | 2.5 | | | 0.22 | 0.00 | | | |
| Uncertainty | 2.5 | R | √3 | 0.23 | 0.26 | 0.33 | 0.38 | 00 |
| Combined Standard Uncertainty | | RSS | | | | 10.16 | 10.03 | |
| Expanded Uncertainty | | | | | | | | |
| (95% CONFIDENCE INTERVAL) | | k | | | | 20.32 | 20.06 | |
| , | | | | - | | | | |



9. E-FIELD PROBE AND DIPOLE ANTENNA CALIBRATION

Probe calibration factors and dipole antenna calibration are included in Appendix C.



APPENDIX A – SYSTEM CHECK DATA

Plot #1

Operating Frequency: 2450MHz Test Date: October 12, 2023

Medium (Liquid Type) : 2450 Head Relative permittivity ϵ r : 38.61 Conductivity σ : 1.74

Probe : Model: SSE2; Serial No.: SN 36/20 EPGO347

Crest factor : 1.0 Conversion Factor : 2.54

Area Scan : dx=8mm, dy=8mm

Zoom Scan : 7x7x7,dx=5mm dy=5mm dz=5mm

Phantom : SAM phantom

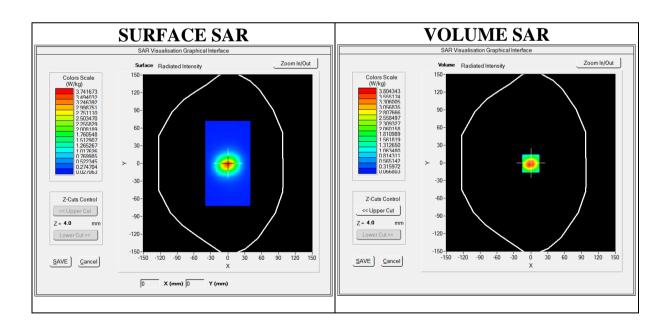
Device Position : Dipole SAR Drift (%) : -1.59%

 Maximum location
 : X=-0.00, Y=-1.00

 SAR Peak (W/kg)
 : 9.34 W/kg

 SAR 10g (W/kg)
 : 2.594 W/kg

SAR 1g (W/kg) : 5.296 W/kg





APPENDIX B – SAR EVALUATION DATA

Plot #1

Operating Frequency: 2439MHz

Product Description: Video Monitor - Parent Unit

Model: VM934 PU (3.6VDC 2600mAh Li-ion rechargeable Battery)

Test Date: October 12, 2023

Medium (Liquid Type) : 2450 Head Relative permittivity ϵ r : 38.61 Conductivity σ : 1.74

Probe : Model: SSE2; Serial No.: SN 36/20 EPGO347

Crest factor : 1.0 Conversion Factor : 2.54

Area Scan : dx=8mm, dy=8mm

Zoom Scan : 7x7x7,dx=5mm dy=5mm dz=5mm

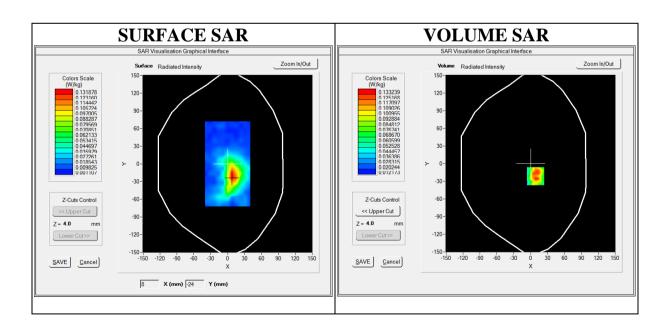
Phantom : SAM phantom

Device Position : front(antenna extended) 0mm separation

SAR Drift (%) : 0.76%

Maximum location : X=-9.00, Y=-21.00

SAR Peak (W/kg) : 0.24 W/kg SAR 10g (W/kg) : 0.070 W/kg SAR 1g (W/kg) : 0.121 W/kg





APPENDIX C - E-FIELD PROBE AND DIPOLE ANTENNA CALIBRATION



COMOSAR E-Field Probe Calibration Report

Ref: ACR.45.13.23.BES.A

INTERTEK TESTING SERVICES HONG KONG LIMITED

WORKSHOP NO. 3 G/F, WORLD-WIDE INDUSTRIAL CENTRE, 43-47 SHAN MEI STREET, FO TAN, SHA TIN, N.T. HONG KONG MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: 0523-EPGO-402

Calibrated at MVG

Z.I. de la pointe du diable Technopôle Brest Iroise – 295 avenue Alexis de Rochon 29280 PLOUZANE - FRANCE

Calibration date: 02/14/2023



Accreditations #2-6789
Scope available on www.cofrac.fr

The use of the Cofrac brand and the accreditation references is prohibited from any reproduction.

Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).



COMOSAR E-FIELD PROBE CALIBRATION REPORT

| | Name | Function | Date | Signature |
|------------------------|---------------|-------------------------|-----------|--------------|
| Prepared by : | Cyrille ONNEE | Measurement Responsible | 2/14/2023 | 3 |
| Checked & approved by: | Jérôme Luc | Technical Manager | 2/14/2023 | JES |
| Authorized by: | Yann Toutain | Laboratory Director | 2/14/2023 | Yann TOUTAAN |

Signature numéric de Yann Toutain IC Yann Toutain ID Date: 2023.02.14

| | Customer Name |
|---------------|---|
| Distribution: | Intertek Testing Services Hong Kong Limited |

| Issue | Name | Date | Modifications |
|-------|---------------|-----------|-----------------|
| A | Cyrille ONNEE | 2/14/2023 | Initial release |
| | | | |
| | | | |
| 4 | | | |





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1 DEVICE UNDER TEST

| Device Under Test | | | |
|--|----------------------------------|--|--|
| Device Type | COMOSÀR DOSIMETRIC E FIELD PROBE | | |
| Manufacturer | MVG | | |
| Model | SSE2 | | |
| Serial Number | 0523-EPGO-402 | | |
| Product Condition (new / used) | New | | |
| Frequency Range of Probe | 0.15 GHz-7.5GHz | | |
| Resistance of Three Dipoles at Connector | Dipole 1: R1=0.221 MΩ | | |
| | Dipole 2: R2=0.211 MΩ | | |
| | Dipole 3: R3=0.230 MΩ | | |

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards.



Figure 1 – MVG COMOSAR Dosimetric E field Probe

| Probe Length | 330 mm |
|--|--------|
| Length of Individual Dipoles | 2 mm |
| Maximum external diameter | 8 mm |
| Probe Tip External Diameter | 2.5 mm |
| Distance between dipoles / probe extremity | 1 mm |

3 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their effect. All calibrations / measurements performed meet the fore-mentioned standards.

3.1 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards for frequency range 600-7500MHz and using the calorimeter cell method (transfer method) as outlined in the standards for frequency 150-450 MHz.



3.2 LINEARITY

The evaluation of the linearity was done in free space using the waveguide, performing a power sweep to cover the SAR range 0.01W/kg to 100W/kg.

ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 to 360 degrees in 15degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis (0°-180°) in 15° increments. At each step the probe is rotated about its axis $(0^{\circ}-360^{\circ})$.

BOUNDARY EFFECT 3.4

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

The boundary effect uncertainty can be estimated according to the following uncertainty approximation formula based on linear and exponential extrapolations between the surface and d_{be} + d_{step} along lines that are approximately normal to the surface:

$$\mathrm{SAR}_{\mathrm{unicentainty}} [\%] = \delta \mathrm{SAR}_{\mathrm{be}} \, \frac{\left(d_{\mathrm{be}} + d_{\mathrm{step}}\right)^2}{2d_{\mathrm{step}}} \frac{\left(e^{-d_{\mathrm{be}}/(\delta \rho)}\right)}{\delta/2} \quad \mathrm{for} \, \left(d_{\mathrm{be}} + d_{\mathrm{step}}\right) < 10 \; \mathrm{mm}$$

where

is the uncertainty in percent of the probe boundary effect SARuncertainty

is the distance between the surface and the closest zoom-scan measurement d_{be}

point, in millimetre

is the separation distance between the first and second measurement points that Δ_{step}

are closest to the phantom surface, in millimetre, assuming the boundary effect

at the second location is negligible

is the minimum penetration depth in millimetres of the head tissue-equivalent δ

liquids defined in this standard, i.e., $\delta \approx 14$ mm at 3 GHz;

in percent of SAR is the deviation between the measured SAR value, at the **⊿**SAR_{be}

distance d_{be} from the boundary, and the analytical SAR value.

The measured worst case boundary effect SARuncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).



4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with a SAR probe calibration using the waveguide or calorimetric cell technique depending on the frequency.

The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is $\pm 11\%$ for the frequency range 150-450MHz.

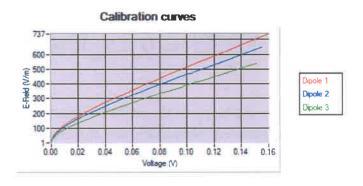
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

| Ambient condition | | | |
|--------------------|-------------|--|--|
| Liquid Temperature | 20 +/- 1 °C | | |
| Lab Temperature | 20 +/- 1 °C | | |
| Lab Humidity | 30-70 % | | |

5.1 CALIBRATION IN AIR

The following curve represents the measurement in waveguide of the voltage picked up by the probe toward the E-field generated inside the waveguide.



From this curve, the sensitivity in air is calculated using the below formula.

$$E^{2} = \sum_{i=1}^{3} \frac{V_{i} (1 + \frac{V_{i}}{DCP_{i}})}{Norm_{i}}$$

where

Vi=voltage readings on the 3 channels of the probe
DCPi=diode compression point given below for the 3 channels of the probe
Normi=dipole sensitivity given below for the 3 channels of the probe



| Normx dipole 1 $(\mu V/(V/m)^2)$ | Normy dipole $2 (\mu V/(V/m)^2)$ | Normz dipole 3 (μ V/(V/m) ²) |
|----------------------------------|----------------------------------|---|
| 0.72 | 0.86 | 1.24 |

| | | DCP dipole 3 |
|------|------|--------------|
| (mV) | (mV) | (mV) |
| 112 | 119 | 110 |

CALIBRATION IN LIQUID

The calorimeter cell or the waveguide is used to determine the calibration in liquid using the formula below.

$$ConvF = \frac{E_{liquid}^2}{E_{air}^2}$$

The E-field in the liquid is determined from the SAR measurement according to the below formula.

$$E_{liquid}^2 = \frac{\rho \, SAR}{\sigma}$$

where

σ=the conductivity of the liquid

p=the volumetric density of the liquid

SAR=the SAR measured from the formula that depends on the setup used. The SAR formulas are given below

For the calorimeter cell (150-450 MHz), the formula is:

$$SAR = c \frac{dT}{dt}$$

where

c=the specific heat for the liquid

dT/dt=the temperature rises over the time

For the waveguide setup (600-75000 MHz), the formula is:

$$SAR = \frac{4P_W}{ab\delta}e^{\frac{-2S}{\delta}}$$

where

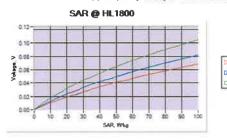
a=the larger cross-sectional of the waveguide b=the smaller cross-sectional of the waveguide δ=the skin depth for the liquid in the waveguide Pw=the power delivered to the liquid



The below table summarize the ConvF for the calibrated liquid. The curves give examples for the measured SAR depending on the voltage in some liquid.

| <u>Liquid</u> | Frequency (MHz*) | ConvF |
|---------------|------------------|-------|
| HL1800 | 1800 | 2.31 |
| BL1800 | 1800 | 2.27 |
| HL1900 | 1900 | 2.40 |
| BL1900 | 1900 | 2.52 |
| HL2450 | 2450 | 2.54 |
| BL2450 | 2450 | 2.82 |

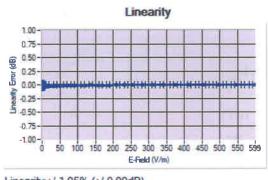
(*) Frequency validity is +/-50MHz below 600MHz, +/-100MHz from 600MHz to 6GHz and +/-500MHz above 6GHz

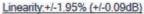


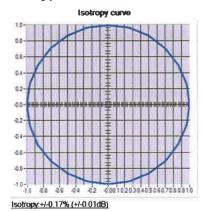


6 VERIFICATION RESULTS

The figures below represent the measured linearity and axial isotropy for this probe. The probe specification is ± -0.2 dB for linearity and ± -0.15 dB for axial isotropy.









LIST OF EQUIPMENT

| | Equip | oment Summary S | sheet | |
|---------------------------------------|----------------------------|---------------------------|---|--|
| Equipment Description | Manufacturer / Model | Identification No. | Current Calibration Date | Next Calibration Date |
| CALIPROBE Test Bench | Version 2 | NA | Validated. No cal required. | Validated. No ca required. |
| Network Analyzer | Rohde & Schwarz ZVM | 100203 | 08/2021 | 08/2024 |
| Network Analyzer | Agilent 8753ES | MY40003210 | 10/2019 | 10/2023 |
| Network Analyzer – Calibration kit | HP 85033D | 3423A08186 | 06/2021 | 06/2027 |
| Network Analyzer – Calibration kit | Rohde & Schwarz ZV-Z235 | 101223 | 07/2022 | 07/2025 |
| Multimeter | Keithley 2000 | 4013982 | 02/2023 | 02/2026 |
| Signal Generator | Rohde & Schwarz SMB | 106589 | 03/2022 | 03/2025 |
| Amplifier | MVG | MODU-023-C-0002 | Characterized prior to test. No cal required. | Characterized prior to test. No cal required |
| Power Meter | NI-USB 5680 | 170100013 | 06/2021 | 06/2024 |
| Power Meter | NI-USB 5680 | 170100013 | . 06/2021 | 06/2024 |
| Directional Coupler | Krytar 158020 | 131467 | Characterized prior to test. No cal required. | |
| Fluoroptic Thermometer | LumaSense Luxtron 812 | 94264 | 09/2022 | 09/2025 |
| Coaxial cell | MVG | SN 32/16 COAXCELL_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG2_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_0G600_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG4_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_0G900_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG6_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_1G500_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG8_1 | Validated. No cal required. | Validated. No cal required. |

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

| Liquid transition | MVG | SN 32/16 WGLIQ_1G800B_1 | Validated. No cal required. | Validated. No cal required. |
|----------------------------------|--------------|----------------------------|-----------------------------|-----------------------------|
| Liquid transition | MVG | SN 32/16 & WGLIQ_1G800H_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG10_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_3G500_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG12_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_5G000_1 | Validated. No cal required. | Validated. No cal required. |
| Waveguide | MVG | SN 32/16 WG14_1 | Validated. No cal required. | Validated. No cal required. |
| Liquid transition | MVG | SN 32/16 WGLIQ_7G000_1 | Validated. No cal required. | Validated. No cal required. |
| Temperature / Humidity Sensor | Testo 184 H1 | 44225320 | 06/2021 | 06/2024 |



Dielectric Probe Calibration Report

Ref: ACR.45.14.23.BES.A

INTERTEK TESTING SERVICES HONG KONG LIMITED

WORKSHOP NO. 3 G/F, WORLD-WIDE INDUSTRIAL CENTRE, 43-47 SHAN MEI STREET, FO TAN, SHA TIN, N.T. HONG KONG MVG LIMESAR DIELECTRIC PROBE

FREQUENCY: 0.4-6 GHZ SERIAL NO.: SN 24/16 OCPG 76

Calibrated at MVG

Z.I. de la pointe du diable Technopôle Brest Iroise – 295 avenue Alexis de Rochon 29280 PLOUZANE - FRANCE

Calibration date: 02/14/2023



Accreditations #2-6789 Scope available on www.cofrac.fr

The use of the Cofrac brand and the accreditation references is prohibited from any reproduction

Summary:

This document presents the method and results from an accredited Dielectric Probe calibration performed at MVG, using the LIMESAR test bench. The test results covered by accreditation are traceable to the International System of Units (SI).





| | Name | Function | Date | Signature |
|------------------------|---------------|-------------------------|-----------|--------------|
| Prepared by: | Cyrille ONNEE | Measurement Responsible | 2/14/2023 | 23 |
| Checked & approved by: | Jérôme Luc | Technical Manager | 2/14/2023 | J35 |
| Authorized by: | Yann Toutain | Laboratory Director | 2/14/2023 | Yann TOUTAAN |

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| Issue | Name | Date | Modifications |
|-------|---------------|-----------|-----------------|
| A | Cyrille ONNEE | 2/14/2023 | Initial release |
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| | 6.1 Liquid complex Permittivity Measurement | |
| 7 | 7 List of Equipment | |



1 INTRODUCTION

This document contains a summary of the suggested methods and requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards for liquid permittivity measurements and the measurements that were performed to verify that the product complies with the fore mentioned standards.

2 DEVICE UNDER TEST

| De | evice Under Test |
|--------------------------------|--------------------------|
| Device Type | LIMESAR DIELECTRIC PROBE |
| Manufacturer | MVG |
| Model | SCLMP |
| Serial Number | SN 24/16 OCPG 76 |
| Product Condition (new / used) | Used |

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's Dielectric Probes are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the LIMESAR test bench only.



Figure 1 – MVG LIMESAR Dielectric Probe



MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards outline techniques for dielectric property measurements. The LIMESAR test bench employs one of the methods outlined in the standards, using a contact probe or open-ended coaxial transmission-line probe and vector network analyzer. The standards recommend the measurement of two reference materials that have well established and stable dielectric properties to validate the system, one for the calibration and one for checking the calibration. The LIMESAR test bench uses De-ionized water as the reference for the calibration and either Ethanediol or Methanol as the reference for checking the calibration. The following measurements were performed to verify that the product complies with the fore-mentioned standards.

LIQUID COMPLEX PERMITTIVITY MEASUREMENTS 4.1

The complex permittivity of a liquid with known dielectric properties was measured and the measurement results compared to the values provided in the fore mentioned standards.

MEASUREMENT UNCERTAINTY 5

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with a SAR probe calibration using the waveguide or calorimetric cell technique depending on the frequency.

The estimated expanded uncertainty (k=2) in calibration for relative permittivity is +/-10% with respect to measurement conditions.

The estimated expanded uncertainty (k=2) in calibration for conductivity (S/m) is $\pm -8.2\%$ with respect to measurement conditions.

CALIBRATION RESULTS

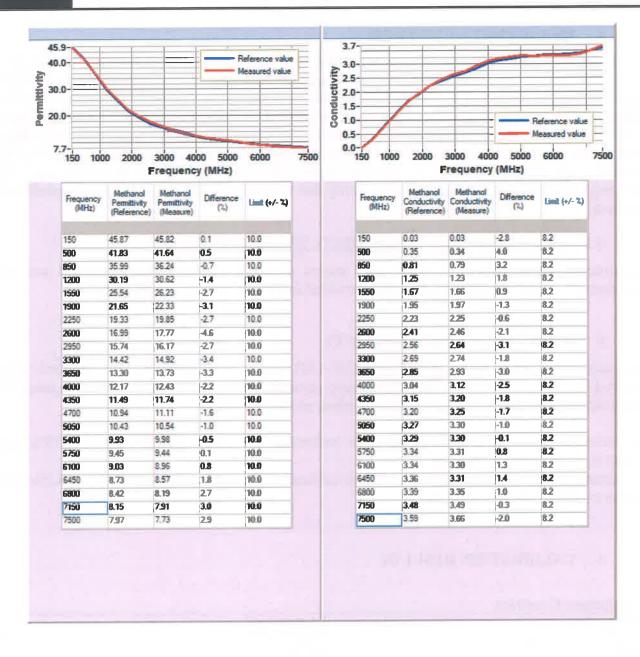
Measurement Condition

| Software | LIMESAR |
|--------------------|-------------|
| Liquid Temperature | 20 +/- 1 °C |
| Lab Temperature | 20 +/- 1 °C |
| Lab Humidity | 30-70 % |

LIQUID COMPLEX PERMITTIVITY MEASUREMENT 6.1

A liquid of known characteristics (methanol or ethanediol) is measured with the probe and the results (complex permittivity $\varepsilon'+i\varepsilon''$) are compared with the reference values for this liquid.









LIST OF EQUIPMENT

| | Equi | pment Summary S | Sheet | |
|---------------------------------------|----------------------------|--------------------|-----------------------------|-----------------------------|
| Equipment Description | Manufacturer / Model | Identification No. | Current Calibration Date | Next Calibration Date |
| LIMESAR Test Bench | Version 3 | NA | Validated. No cal required. | Validated. No cal required. |
| Liquid measurement probe | MVG | SN 35/10 OCPG37 | 11/2022 | 11/2023 |
| Network Analyzer | Rohde & Schwarz ZVM | 100203 | 08/2021 | 08/2024 |
| Network Analyzer | Agilent 8753ES | MY40003210 | 10/2019 | 10/2023 |
| Network Analyzer – Calibration kit | Rohde & Schwarz ZV-Z235 | 101223 | 07/2022 | 07/2025 |
| Network Analyzer – Calibration kit | HP 85033D | 3423A08186 | 06/2021 | 06/2027 |
| Temperature / Humidity Sensor | Testo 184 H1 | 44225320 | 06/2021 | 06/2024 |



SAR Reference Dipole Calibration Report

Ref: ACR.45.17.23.BES.A

INTERTEK TESTING SERVICES HONG KONG LIMITED

WORKSHOP NO. 3 G/F, WORLD-WIDE INDUSTRIAL CENTRE, 43-47 SHAN MEI STREET, FO TAN, SHA TIN, N.T. HONG KONG MVG COMOSAR REFERENCE DIPOLE

FREQUENCY: 2450 MHZ

SERIAL NO.: SN 22/16 DIP2G450-411

Calibrated at MVG

Z.I. de la pointe du diable Technopôle Brest Iroise – 295 avenue Alexis de Rochon 29280 PLOUZANE - FRANCE

Calibration date: 02/14/2023



Accreditations #2-6789 and #2-6814 Scope available on www.cofrac.fr

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Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.





| | Name | Function | Date | Signature |
|------------------------|---------------|-------------------------|-----------|--------------|
| Prepared by: | Cyrille ONNEE | Measurement Responsible | 2/14/2023 | 3 |
| Checked & approved by: | Jérôme Luc | Technical Manager | 2/14/2023 | JES |
| Authorized by: | Yann Toutain | Laboratory Director | 2/14/2023 | Yann TOUTAAN |

Signature numéric Yann Yann | de Yann Toutain IC |
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| | Kong Limited | |

| Issue | Name | Date | Modifications |
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| Α | Cyrille ONNEE | 2/14/2023 | Initial release |
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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

2 DEVICE UNDER TEST

| Device Under Test | | | | | | | |
|---|-----------------------|--|--|--|--|--|--|
| Device Type COMOSAR 2450 MHz REFERENCE DIPOLI | | | | | | | |
| Manufacturer | MVG | | | | | | |
| Model | SID2450 | | | | | | |
| Serial Number | SN 22/16 DIP2G450-411 | | | | | | |
| Product Condition (new / used) | Used | | | | | | |

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards. The product is designed for use with the COMOSAR test bench only.



Figure 1 – MVG COMOSAR Validation Dipole



4 MEASUREMENT METHOD

4.1 MECHANICAL REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness. A direct method is used with a ISO17025 calibrated caliper.

4.2 S11 PARAMETER REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a S11 of -20 dB or better. The S11 measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

4.3 SAR REQUIREMENTS

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore-mentioned standards.

5 MEASUREMENT UNCERTAINTY

5.1 MECHANICAL DIMENSIONS

For the measurement in the range 0-300mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.20 mm with respect to measurement conditions.

For the measurement in the range 300-450mm, the estimated expanded uncertainty (k=2) in calibration for the dimension measurement in mm is +/-0.44 mm with respect to measurement conditions.

5.2 S11 PARAMETER

The estimated expanded uncertainty (k=2) in calibration for the S11 parameter in linear is ± -0.08 with respect to measurement conditions.

5.3 SAR

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty for validation measurements.

The estimated expanded uncertainty (k=2) in calibration for the 1g and 10g SAR measurement in W/kg is +/-19% with respect to measurement conditions.



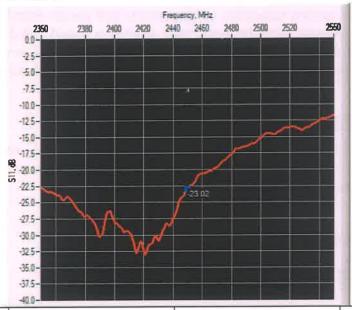
6 CALIBRATION RESULTS

6.1 MECHANICAL DIMENSIONS

| L mm | | h | nm | d mm | | |
|-------------------|--------------|-------------------|--------------|----------|-------------|--|
| Measured Required | | Measured Required | | Measured | Required | |
| _ | 51.50 +/- 2% | - | 30.40 +/- 2% | - | 3.60 +/- 2% | |

6.2 <u>S11 PARAMETER</u>

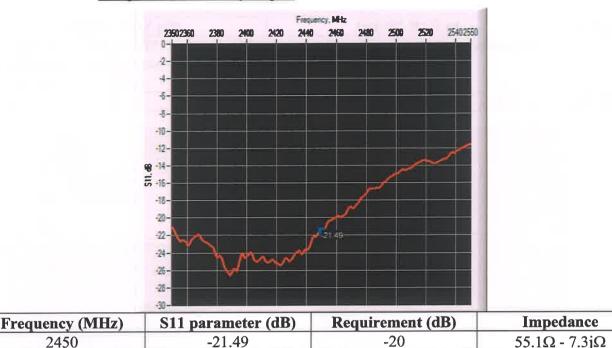
6.2.1 S11 parameter in Head Liquid



| Frequer | Frequency (MHz) S11 parameter (dB) | | Requirement (dB) | Impedance | | |
|---------|------------------------------------|--------|------------------|-------------------------|--|--|
| 2 | 450 | -23.02 | -20 | 51.6Ω - 7.0 jΩ | | |



6.2.2 S11 parameter in Body Liquid



6.3 SAR

2450

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

6.3.1 SAR with Head Liquid

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

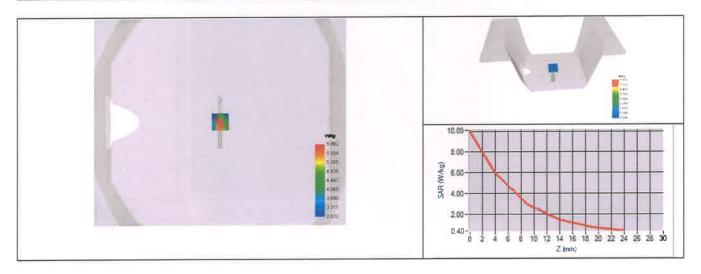
| Software | OPENSAR V5 | | | |
|---|--|--|--|--|
| Phantom | SN 13/09 SAM68 | | | |
| Probe | SN 41/18 EPGO333 | | | |
| Liquid | Head Liquid Values: eps': 41.4 sigma: 1.83 | | | |
| Distance between dipole center and liquid | 10.0 mm | | | |
| Area scan resolution | dx=8mm/dy=8mm | | | |
| Zoon Scan Resolution | dx=5mm/dy=5mm/dz=5mm | | | |
| Frequency | 2450 MHz | | | |
| Input power | 20 dBm | | | |
| Liquid Temperature | 20 +/- 1 °C | | | |
| Lab Temperature | 20 +/- 1 °C | | | |

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| Lab Humidity | 30-70 % |
|--------------|---------|

| Frequency | | ig SAR (W/kg |) | 10g SAR (W/kg) | | | |
|-----------|------------------------------------|--------------|-------------------------------|------------------|-------|-------------------------------|--|
| | Measured Measured normalized to 1W | | Target normalized to 1W | normalized norma | | Target normalized to 1W | |
| 2450 MHz | 5.34 | 53.37 | 52.40 | 2.46 | 24.61 | 24.00 | |



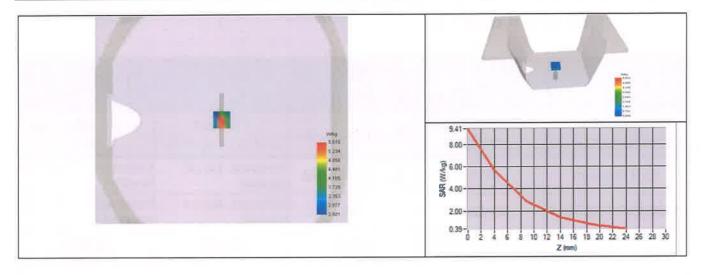
6.3.2 SAR with Body Liquid

| Software | OPENSAR V5 | | | | |
|---|--|--|--|--|--|
| Phantom | SN 13/09 SAM68 | | | | |
| Probe | SN 41/18 EPGO333 | | | | |
| Liquid | Body Liquid Values: eps': 51.5 sigma: 2.12 | | | | |
| Distance between dipole center and liquid | 10.0 mm | | | | |
| Area scan resolution | dx=8mm/dy=8mm | | | | |
| Zoon Scan Resolution | dx=5mm/dy=5mm/dz=5mm | | | | |
| Frequency | 2450 | | | | |
| Input power | 20 dBm | | | | |
| Liquid Temperature | 20 +/- 1 °C | | | | |
| Lab Temperature | 20 +/- 1 °C | | | | |
| Lab Humidity | 30-70 % | | | | |

| Frequency | | lg SAR (W/kg | <u>(</u>) | 10g SAR (W/kg) | | | |
|-----------|------------------------------|--------------|-------------------|----------------|------------------------|-------------------|--|
| | Measured Measured normalized | | Target normalized | Measured | Measured normalized | Target normalized | |
| | | to 1W | to 1W | | to 1W | to 1W | |
| 2450 MHz | 5.28 | 52.78 | 51.20 | 2.37 | 23.75 | 23.70 | |









LIST OF EQUIPMENT

| | Equipment Summary Sheet | | | | | | | | | | |
|---------------------------------------|----------------------------|--------------------|---|---|--|--|--|--|--|--|--|
| Equipment Description | Manufacturer / Model | Identification No. | Current Calibration Date | Next Calibration Date | | | | | | | |
| SAM Phantom | MVG | SN 13/09 SAM68 | Validated. No cal required. | Validated. No cal required. | | | | | | | |
| COMOSAR Test Bench | Version 3 | NA | Validated. No cal required. | Validated, No cal required. | | | | | | | |
| Network Analyzer | Rohde & Schwarz ZVM | 100203 | 08/2021 | 08/2024 | | | | | | | |
| Network Analyzer | Agilent 8753ES | MY40003210 | 10/2019 | 10/2023 | | | | | | | |
| Network Analyzer – Calibration kit | Rohde & Schwarz ZV-Z235 | 101223 | 07/2022 | 07/2025 | | | | | | | |
| Network Analyzer – Calibration kit | HP 85033D | 3423A08186 | 06/2021 | 06/2027 | | | | | | | |
| Calipers | Mitutoyo | SN 0009732 | 11/2022 | 11/2025 | | | | | | | |
| Reference Probe | MVG | SN 41/18 EPGO333 | 09/2022 | 09/2023 | | | | | | | |
| Multimeter | Keithley 2000 | 1160271 | 02/2020 | 02/2023 | | | | | | | |
| Signal Generator | Rohde & Schwarz SMB | 106589 | 03/2022 | 03/2025 | | | | | | | |
| Amplifier | MVG | MODU-023-C-0002 | Characterized prior to test. No cal required. | Characterized prior to test. No cal required. | | | | | | | |
| Power Meter | NI-USB 5680 | 170100013 | 06/2021 | 06/2024 | | | | | | | |
| Power Meter | Keysight U2000A | SN: MY62340002 | 10/2022 | 10/2025 | | | | | | | |
| Directional Coupler | Krytar 158020 | 131467 | Characterized prior to test. No cal required. | Characterized prior to test. No cal required. | | | | | | | |
| Temperature / Humidity Sensor | Testo 184 H1 | 44225320 | 06/2021 | 06/2024 | | | | | | | |



APPENDIX D – SAR SYSTEM VALIDATION

Per KDB 865664, SAR system validation status should be documented to confirm measurement accuracy. SAR measurement systems are validated according to procedures in KDB 865664. The validation status is documented according to the validation date(s), measurement frequencies, SAR probe and tissue dielectric parameters. When multiple SAR system is used, the validation status of each SAR system is needed to be documented separately according to the associated system components.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probe and tissue dielectric parameters are shown as below.

| | | | | CW Validation | | | | | | Mod. Validation Peak to | | | |
|----------------|--------------|--------------------------|----------------|---------------|------|-------------|--------------------|-------------------|--------------|----------------------------|---------------------------|--|--|
| Date | Probe S/N | Tested Freq. (MHz) | Tissue Type | Perm | Cond | Sensitivity | Probe Linearity | Probe Isotropy | Mod. Type | Duty Factor | average power ratio | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Head | 38.92 | 1.86 | PASS | PASS | PASS | FHSS | PASS | PASS | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Body | 51.64 | 1.99 | PASS | PASS | PASS | FHSS | PASS | PASS | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Head | 38.92 | 1.86 | PASS | PASS | PASS | OFDM | N/A | PASS | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Body | 51.64 | 1.99 | PASS | PASS | PASS | OFDM | N/A | PASS | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Head | 38.92 | 1.86 | PASS | PASS | PASS | DSSS | PASS | N/A | | |
| 20/11/ 2021 | EPGO 347 | 2450 | Body | 51.64 | 1.99 | PASS | PASS | PASS | DSSS | PASS | N/A | | |