TEST REPORT

Dt&C

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1. Report No : DRRFCC2206-0109

2. Customer

   • Name : SENA TECHNOLOGIES.Inc

   • Address : 19, Heolleung-ro 569-gil, Gangnam-gu Seoul South Korea

3. Use of Report : FCC Original Grant

4. Product Name / Model Name : M1 / SP109

   FCC ID : S7A-SP109

5. FCC Regulation(s) : CFR 47 Part 2 subpart 2.1093

   Test Method Used : IEEE 1528-2013, FCC SAR KDB Publications (Details in test report)

   IEC/IEEE 62209-1528

6. Date of Test : 2022.04.18.

7. Location of Test : ☒ Permanent Testing Lab ☐ On Site Testing

8. Testing Environment : Refer to appended test report.

9. Test Result : Refer to the attached test result.

The results shown in this test report refer only to the sample(s) tested unless otherwise stated.
This test report is not related to KOLAS accreditation.

Affirmation	Tested by Name : YeJin Seo (Signature)	Reviewed by Name : HakMin Kim (Signature)

2022 . 06 . 15 .

DT&C Co., Ltd.

If this report is required to confirmation of authenticity, please contact to report@dtnc.net

Test Report Version

Test Report No.	Date	Description	Tested by	Reviewed by
DRRFCC2206-0109	Jun. 15, 2022	Initial issue	YeJin Seo	HakMin Kim

Table of Contents

1. DESCRIPTION OF DEVICE

1.1 General Information

EUT type	M1		
FCC ID	S7A-SP109		
Equipment model name	SP109		
Equipment add model name	N/A		
Firmware Version Identification Number	1.0		
Equipment serial no.	Identical prototype		
FCC & ISED MRA Designation No.	KR0034		
ISED#	5740A		
Mode(s) of Operation	Bluetooth		
TX Frequency Range	**Band**	**Operating Modes**	**Frequency**
	Bluetooth	Data	2 402 ~ 2 480 MHz
RX Frequency Range	Bluetooth	Data	2 402 ~ 2 480 MHz

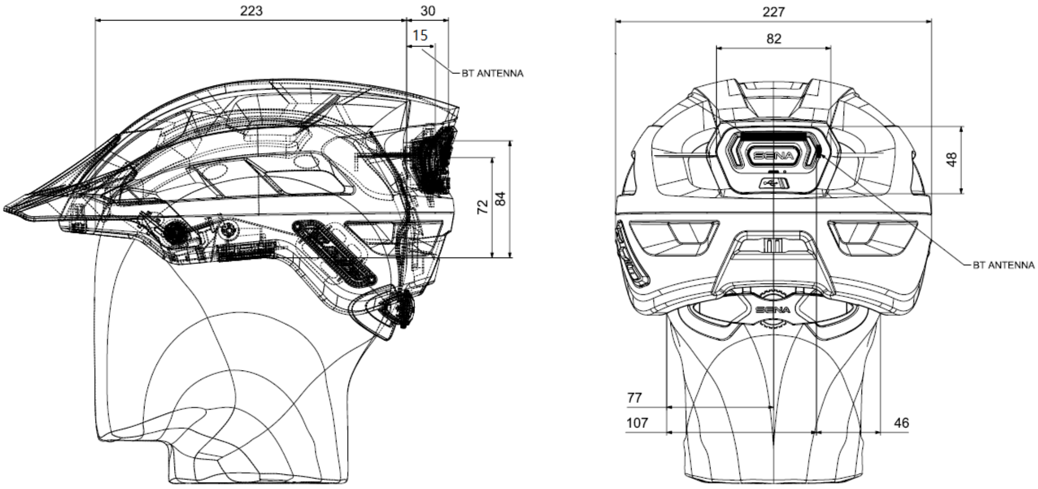
Equipment Class	Band	Reported SAR
		1 g SAR (W/kg)
		Head
DSS	Bluetooth	**0.29**

FCC Equipment Class	Part 15 Spread Spectrum Transmitter(DSS)
Date(s) of Tests	2022.04.18
Antenna Type	Internal Antenna
Functions	● Bluetooth (2.4 GHz) is supported.

1.2 Guidance Applied

- IEEE 1528-2013
- IEC/IEEE 62209-1528
- FCC KDB Publication 447498 D01v06 (General RF Exposure Guidance)
- FCC KDB Publication 690783 D01v01r03 (SAR Listings on Grants)
- FCC KDB Publication 865664 D01v01r04 (SAR Measurement 100 MHz to 6 GHz)
- FCC KDB Publication 865664 D02v01r02 (RF Exposure Reporting)
- October 2016 TCB Workshop Notes (Bluetooth Duty Factor)

1.3 DUT Antenna Locations



Note: At the applicant's request, the Bluetooth SAR test was performed at a separation distance of 10 mm.

1.4 SAR Test Exclusions

Per FCC KDB 447498 D01v06, the SAR exclusion threshold for distances < 50 mm is defined by the following equation:

$$\frac{Max\ Power\ of\ Channel\ (mW)}{Test\ Separation\ Dist\ (mm)} * \sqrt{Frequency(GHz)} \leq 3.0$$

Table 1.1 SAR exclusion threshold for distances < 50 mm

Mode	Equation	Result	SAR exclusion threshold	Required SAR
Bluetooth	[(46.77/10.0) * √2.480]	7.4	3.0	O
Bluetooth LE	[(2.00/10.0) * √2.480]	0.3	3.0	X

Per KDB Publication 447498 D01v06, the maximum power of the channel was rounded to the nearest mW before calculation.

1.4 Power Reduction for SAR

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

1.5 Device Serial Numbers

Band & Mode	Serial Number
Bluetooth	FCC #1

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2. INTROCUCTION

The FCC and Industry Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices.

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in Biological Effects and Exposure Criteria for Radio frequency Electromagnetic Fields," NCRP Report No. 86 NCRP, 1986, Bethesda, MD 20814. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ) It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 2.1)

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

Fig. 2.1 SAR Mathematical Equation

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

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

where:

σ = conductivity of the tissue-simulating material (S/m)

ρ = mass density of the tissue-simulating material (kg/m^3)

E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.

3. DESCRIPTION OF TEST EQUIPMENT

3.1 SAR MEASUREMENT SETUP

Measurements are performed using the DASY5 automated dosimetric assessment system. The DASY5 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 3.1).

A cell controller system contains the power supply, robot controller each pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Intel Core i7-3 700 3.40 GHz desktop computer with Windows 7 Professional system and SAR Measurement Software DASY5, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

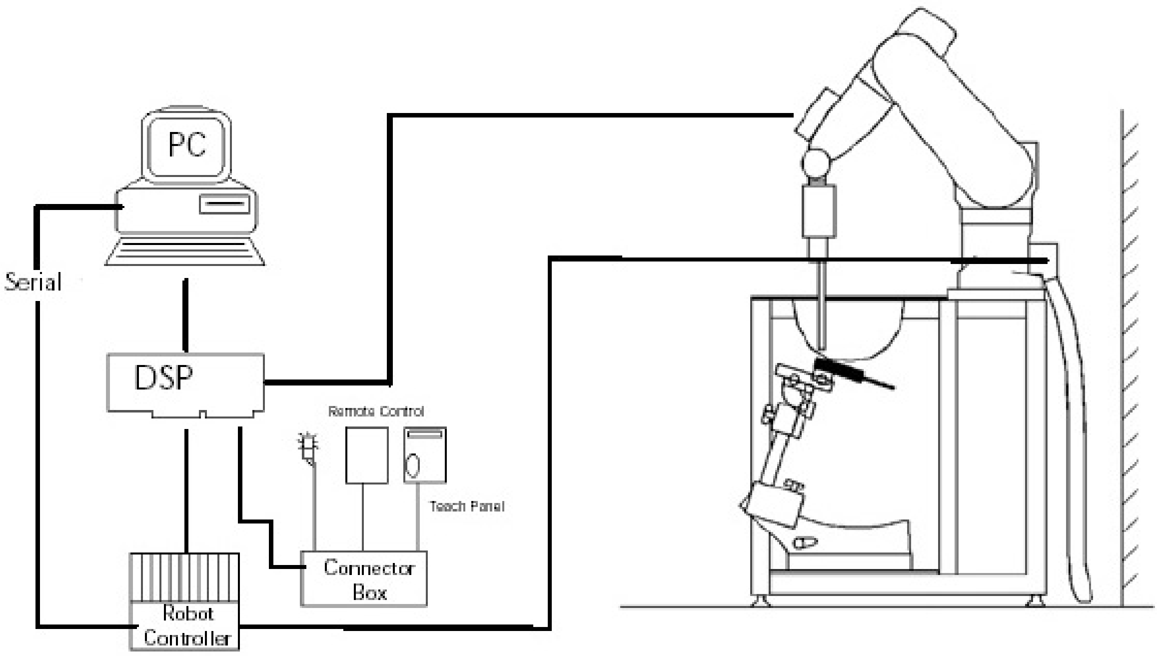

Figure 3.1 SAR Measurement System Setup

The DAE3 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail.

3.2 Probe Specification

Calibration	In air from 4 MHz to 10 GHz In brain and muscle simulating tissue at Frequencies of 1450, 2 450, 2 600, 3 500, 3 700, 5 200, 5 300, 5 500, 5 600, 5 800 MHz
Frequency	4 MHz to 10 GHz
Linearity	±0.2 dB(30 MHz to 10 GHz)
Dynamic	10 µW/g to > 100 mW/g
Range	Linearity : ±0.2 dB
Dimensions	Overall length : 337 mm
Tip length	20 mm
Body diameter	12 mm
Tip diameter	2.5 mm
Distance from probe tip to sensor center	1.0 mm
Application	SAR Dosimetry Testing Compliance tests of mobile phones

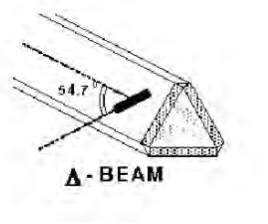

Figure 3.2 Triangular Probe Configurations

Figure 3.3 Probe Thick-Film Technique

DAE System

The SAR measurements were conducted with the dosimetric probe EX3DV4 designed in the classical triangular configuration (see Fig. 3.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multitier line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY5 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.

3.3 Probe Calibration Process

3.3.1 E-Probe Calibration

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure with accuracy better than ±10 %. The spherical isotropy was evaluated with the procedure and found to be better than ±0.25 dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

Temperature Assessment *

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium, correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent the remits or based temperature probe is used in conjunction with the E-field probe.

$$\text{SAR} = C\frac{\Delta T}{\Delta t}$$

where:

Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

ΔT = temperature increase due to RF exposure.

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

where:

σ = simulated tissue conductivity,

ρ = Tissue density (1.25 g/cm^3 for brain tissue)

SAR is proportional to ΔT / Δt , the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

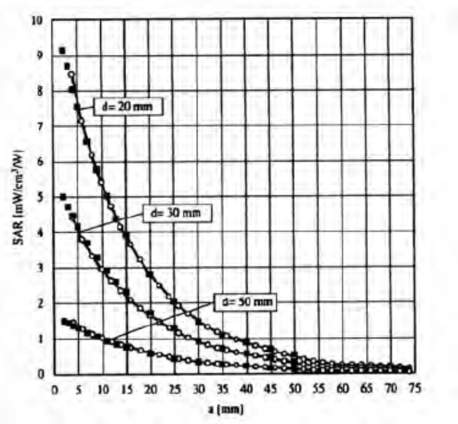

Figure 3.4 E-Field and Temperature Measurements at 900 MHz

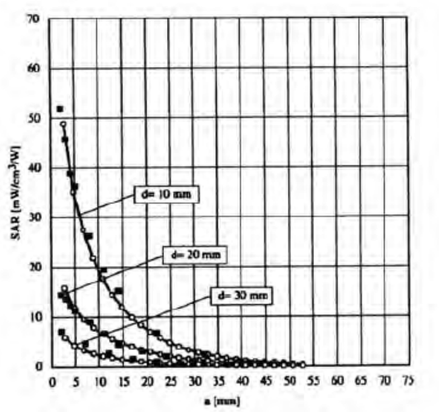

Figure 3.5 E-Field and Temperature Measurements at 1 800 MHz

3.4 Data Extrapolation

The DASY5 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

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

with
V_i = compensated signal of channel i (i=x,y,z)
U_i = input signal of channel i (i=x,y,z)
cf = crest factor of exciting field (DASY parameter)
dcp_i = diode compression point (DASY parameter)

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

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with
V_i = compensated signal of channel i (i = x,y,z)
$Norm_i$ = sensor sensitivity of channel i (i = x,y,z) $\mu V/(V/m)^2$ for E-field probes
ConvF = sensitivity of enhancement in solution
E_i = electric field strength of channel i in V/m

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

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

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with
SAR = local specific absorption rate in W/g
E_{tot} = total field strength in V/m
σ = conductivity in [mho/m] or [Siemens/m]
ρ = equivalent tissue density in g/cm^3

The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = \frac{E_{tot}^2}{3770}$$

with
P_{pwe} = equivalent power density of a plane wave in W/cm^2
E_{tot} = total electric field strength in V/m

3.5 SAM Twin Phantom

The SAM Twin Phantom V5.0 is constructed of a fiberglass shell integrated in a wooden table. The shape of the shell is based on data from an anatomical study designed to determine the maximum exposure in at least 90 % of all users. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents the evaporation of the liquid.

Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. F.5.1)

Figure 3.5.1 SAM Twin Phantom

SAM Twin Phantom Specification:

Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot. Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.
Shell Thickness	(2.0 ± 0.2) mm
Filling Volume	Approx. 25 liters
Dimensions	Length: 1 000 mm Width: 500 mm Height: adjustable feet

Specific Anthropomorphic Mannequin (SAM) Specifications:

The phantom for handset SAR assessment testing is a low-loss dielectric shell, with shape and dimensions derived from the anthropometric data of the 90th percentile adult male head dimensions as tabulated by the US Army. The SAM Twin Phantom shell is bisected along the mid-sagittal plane into right and left halves (see Fig. E.5.2). The perimeter sidewalls of each phantom halves are extended to allow filling with liquid to a depth that is sufficient to minimized reflections from the upper surface. The liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.

Figure 3.5.2 Sam Twin Phantom shell

3.6 Device Holder for Transmitters

In combination with the Twin SAM Phantom V4.0/V4.0c, V5.0 or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.

Figure 3.8 Mounting Device

3.7 Brain Simulation Mixture Characterization

The brain and muscle mixtures consist of a viscous gel using hydrox-ethylcellulose (HEC) gelling agent and saline solution (see Table 3.1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Harts grove.

Figure 3.9 Simulated Tissue

Table 3.1 Composition of the Tissue Equivalent Matter

Ingredients (% by weight)	Frequency (MHz)
	2 450
Tissue Type	**Head**
Water	71.88
Salt (NaCl)	0.16
Sugar	-
HEC	-
Bactericide	-
Triton X-100	19.97
DGBE	7.99
Diethylene glycol hexyl ether	-
Polysorbate (Tween) 80	-
Target for Dielectric Constant	39.20
Target for Conductivity (S/m)	1.80

Salt:	99 % Pure Sodium Chloride	Sugar:	98 % Pure Sucrose
Water:	De-ionized, 16M resistivity	HEC:	Hydroxyethyl Cellulose
DGBE:	99 % Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy) ethanol]		
Triton X-100(ultra pure):	Polyethylene glycol mono[4-(1,1,3,3-tetramethylbutyl)phenyl] ether		

3.8 SAR TEST EQUIPMENT

Table 3.2 Test Equipment Calibration

	Type	Manufacturer	Model	Cal.Date	Next.Cal.Date	S/N
☒	SEMITEC Engineering	SEMITEC	N/A	N/A	N/A	Shield Room
☒	Robot	SPEAG	TX90XL	N/A	N/A	F13/5P9GA1/A/01
☒	Robot Controller	SPEAG	CS8C	N/A	N/A	F13/5P9GA1/C/01
☒	Joystick	SPEAG	N/A	N/A	N/A	S-12450905
☒	Intel Core i7-3 770K 3.40 GHz Window 7 Professional	N/A	N/A	N/A	N/A	N/A
☒	Twin SAM Phantom	SPEAG	QD000P40CD	N/A	N/A	1786
☒	Probe Alignment Unit LB	N/A	N/A	N/A	N/A	SE UKS 030 AA
☒	Mounting Device	SPEAG	SD000H01KA	N/A	N/A	N/A
☒	Data Acquisition Electronics	SPEAG	DAE3V1	2021-11-23	2022-11-23	520
☒	Dosimetric E-Field Probe	SPEAG	EX3DV4	2021-07-26	2022-07-26	3930
☒	2 450 MHz SAR Dipole	SPEAG	D2450V2	2021-09-22	2023-09-22	726
☒	Network Analyzer	Agilent	E5071C	2021-06-24	2022-06-24	MY46106970
☒	Signal Generator	Agilent	E4438C	2021-06-24	2022-06-24	US41461520
☒	High Power RF Amplifier	EMPOWER	BBS3Q8CCJ	2021-06-24	2022-06-24	1005
☒	Power Meter	HP	EPM-442A	2021-12-16	2022-12-16	GB37170267
☒	Power Meter	Anritsu	ML2495A	2021-12-16	2022-12-16	1435003
☒	Power Sensor	HP	8481A	2021-12-16	2022-12-16	2702A65976
☒	Power Sensor	HP	8481A	2021-12-16	2022-12-16	2702A61707
☒	Power Sensor	Anritsu	MA2491A	2021-12-16	2022-12-16	0845478
☒	Dual Directional Coupler	HP	772D	2021-06-24	2022-06-24	2889A01064
☒	Low Pass Filter 3.0 GHz	Micro LAB	LA-30N	2021-06-24	2022-06-24	N/A
☒	Attenuators (10 dB)	WEINSCHEL	23-10-34	2021-12-16	2022-12-16	BP4387
☒	Step Attenuator	H/P	8494A	2021-06-24	2022-06-24	3308A33341
☒	Dielectric Assessment kit	SPEAG	DAKS-3.5	2021-07-22	2022-07-22	1046
			R140	2021-07-29	2022-07-29	0101213

NOTE(S):
1. The E-field probe was calibrated by SPEAG, by temperature measurement procedure. Dipole Verification measurement is performed by DT&C before each test. The brain and muscle simulating material are calibrated by DT&C using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the brain and muscle-equivalent material. Each equipment item was used solely within its respective calibration period.
2. CBT(Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

4. TEST SYSTEM SPECIFICATIONS

Automated TEST SYSTEM SPECIFICATIONS:

Positioner

Robot	Stäubli Unimation Corp. Robot Model: TX90XL
Repeatability	0.02 mm
No. of axis	6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor	Intel Core i7-3 770
Clock Speed	3.4 GHz
Operating System	Windows 7 Professional
Data Card	DASY5 PC-Board

Data Converter

Features	Signal, multiplexer, A/D converter. & control logic
Software	DASY5
Connecting Lines	Optical downlink for data and status info Optical uplink for commands and clock

PC Interface Card

Function	24 bit (64 MHz) DSP for real time processing Link to DAE 3 16 bit A/D converter for surface detection system serial link to robot direct emergency stop output for robot

E-Field Probes

Model	EX3DV4 S/N: 3930
Construction	Triangular core fiber optic detection system
Frequency	4 MHz to 10 GHz
Linearity	±0.2 dB (30 MHz to 10 GHz)

Phantom

Phantom	SAM Twin Phantom (V5.0)
Shell Material	Composite
Thickness	(2.0 ± 0.2) mm

Figure 4.1 DASY5 Test System

5. SAR MEASUREMENT PROCEDURE

5.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to
FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

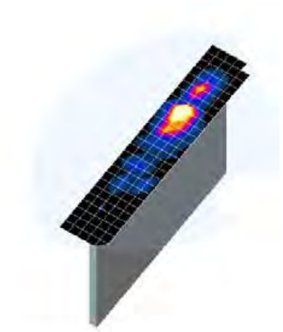

Figure 5.1
Sample SAR Area Scan

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 5.1) and IEEE1528-2013.

2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1 g/10 g cube evaluation. SAR at this fixed point was measured and used as a reference value.

3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 5.1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):

   a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 5.1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).

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

   c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5 %, the SAR test and drift measurements were repeated.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 mm ± 1 mm	$\frac{1}{2}\cdot\delta\cdot\ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	≤ $1.5\cdot\Delta z_{Zoom}(n-1)$ 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 *area scan based 1-g SAR estimation* 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.

Table 5.1 Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

6. RF EXPOSURE LIMITS

Uncontrolled Environment:

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Controlled Environment:

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 6.1.SAR Human Exposure Specified in ANSI/IEEE C95.1-1992

	HUMAN EXPOSURE LIMITS	
	General Public Exposure (W/kg) or (mW/g)	Occupational Exposure (W/kg) or (mW/g)
SPATIAL PEAK SAR * (Brain)	1.60	8.00
SPATIAL AVERAGE SAR ** (Whole Body)	0.08	0.40
SPATIAL PEAK SAR *** (Hands / Feet / Ankle / Wrist)	4.00	20.0

1. 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.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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

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

7. SAR MEASUREMENT PROCEDURES

7.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, When SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported SAR. The highest reported SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

Unless specifically authorized through a KDB inquiry, the SAM (head) phantom is generally unacceptable for testing the SAR of other head and body exposure conditions; for example, testing headsets at the SAM phantom ear location is generally unacceptable.

8. Nominal and Maximum Output Power Spec and RF Conducted Powers

This device 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 D01v06.

8.1 Bluetooth Nominal and Maximum Output Power Spec and Conducted Powers

Modulated Average [dBm]		Low [dBm]	Mid [dBm]	High [dBm]
Bluetooth 1 Mbps	Maximum	16.50	16.70	16.70
	Nominal	15.50	15.70	15.70
Bluetooth 2 Mbps	Maximum	6.20	6.50	7.00
	Nominal	5.20	5.50	6.00
Bluetooth 3 Mbps	Maximum	6.20	6.50	7.00
	Nominal	5.20	5.50	6.00

Table 8.1.1 Bluetooth Nominal and Maximum Output Power Spec

Modulated Average [dBm]		Low [dBm]	Mid [dBm]	High [dBm]
Bluetooth LE	Maximum	2.20	2.50	3.00
	Nominal	1.20	1.50	2.00

Table 8.1.2 Bluetooth LE Nominal and Maximum Output Power Spec

Channel	Frequency (MHz)	Frame AVG Output Power (1 Mbps) (dBm)	Frame AVG Output Power (2 Mbps) (dBm)	Frame AVG Output Power (3 Mbps) (dBm)
Low	2 402	16.41	6.06	6.19
Mid	2 441	16.66	6.26	6.41
High	2 480	16.55	6.62	6.86

Table 8.1.3 Bluetooth Frame Average RF Power

Channel	Frequency (MHz)	Frame AVG Output Power (LE) (dBm)
Low	2 402	2.04
Mid	2 440	2.27
High	2 480	2.74

Table 8.1.4 Bluetooth LE Frame Average RF Power

- **Bluetooth Conducted Powers procedures**

1) Enter Bluetooth mode by S/W and operate it.
   When it operating, The EUT is transmitting at maximum power level and duty cycle fixed.
2) Instruments and EUT were connected like Figure 8.1.
3) The average conducted output powers of Bluetooth and each frequency can measurement according to setting S/W.
4) Power levels were measured by a Power Meter.

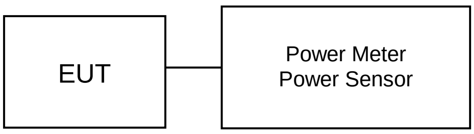

Figure 8.1 Average Power Measurement Setup

The average conducted output powers of Bluetooth were measured using above test setup and a wideband gated RF power meter when the EUT is transmitting at its maximum power level.

- **Bluetooth Transmission Plot**

Figure 8.2 Bluetooth Transmission Plot

- **Bluetooth Duty Cycle Calculation**

Duty Cycle = Pulse/Period * 100 % = (2.88/3.75) * 100 = 76.8 %

9. SYSTEM VERIFICATION

9.1 Tissue Verification

MEASURED TISSUE PARAMETERS										
Date(s)	**Tissue Type**	**Ambient Temp. [°C]**	**Liquid Temp. [°C]**	**Measured Frequency [MHz]**	**Target Dielectric Constant, εr**	**Target Conductivity, σ (S/m)**	**Measured Dielectric Constant, εr**	**Measured Conductivity, σ (S/m)**	**Er Deviation [%]**	**σ Deviation [%]**
Apr. 18. 2022	2 450 Head	20.0	20.1	2 402	39.282	1.757	39.250	1.798	-0.08	2.33
				2 441	39.215	1.792	39.111	1.840	-0.27	2.68
				2 450	39.200	1.800	39.079	1.850	-0.31	2.78
				2 480	39.160	1.832	38.963	1.882	-0.50	2.73

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB 865664 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Measurement Procedure for Tissue verification:

1) The network analyzer and probe system was configured and calibrated.
2) The probe was immersed in the sample which was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
3) The complex admittance with respect to the probe aperture was measured
4) The complex relative permittivity , for example from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\varepsilon_r\varepsilon_0}{[\ln(b/a)]^2}\int_a^b\int_a^b\int_0^\pi \cos\phi' \frac{\exp\left[-j\omega r(\mu_0\varepsilon_r'\varepsilon_0)^{1/2}\right]}{r} d\phi' d\rho' d\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively, $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$, ω is the angular frequency, and $j = \sqrt{-1}$.

9.2 Test System Verification

Prior to assessment, the system is verified to the ±10 % of the specifications at 2 450 MHz by using the SAR Dipole kit(s). (Graphic Plots Attached)

SYSTEM DIPOLE VERIFICATION TARGET & MEASURED												
SAR System #	Freq. [MHz]	SAR Dipole kits	Date(s)	Tissue Type	Ambient Temp. [°C]	Liquid Temp. [°C]	Probe S/N	Input Power (mW)	1 W Target SAR_{1g} (W/kg)	Measured SAR_{1g} (W/kg)	1 W Normalized SAR_{1g} (W/kg)	Deviation [%]
C	2 450	D2450V2, S/N: 726	Apr. 18. 2022	Head	20.0	20.1	3930	100	51.8	5.11	51.10	-1.35

Note: Full system validation status and results can be found in Attachment 3.

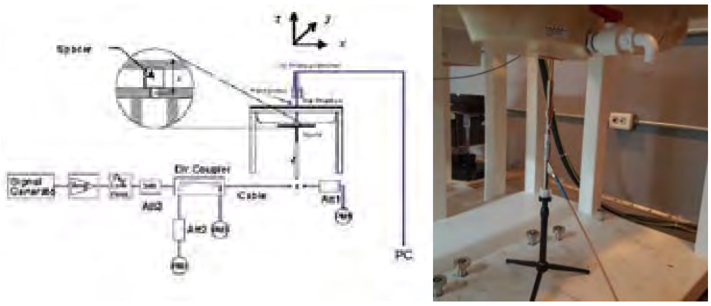

Figure 9.1 Dipole Verification Test Setup Diagram & Photo

10. SAR TEST RESULTS

10.1 Head SAR Results

Table 10.1.1 Bluetooth Head SAR

MEASUREMENT RESULTS														
FREQUENCY		Mode	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Drift Power [dB]	Phantom Position	Device Serial Number	Rate [Mbps]	Duty Cycle (%)	1g SAR (W/kg)	Scaling Factor	Scaling Factor (Duty Cycle)	1g Scaled SAR (W/kg)	Plots #
MHz	Ch													
2 441	39	Bluetooth	16.70	16.66	-0.030	10 mm [Rear]	FCC #1	1	76.8	0.218	1.009	1.302	**0.286**	A1
ANSI / IEEE C95.1-1992– SAFETY LIMIT **Spatial Peak** **Uncontrolled Exposure/General Population Exposure**								**Head** **1.6 W/kg (mW/g)** averaged over 1 gram						

Note: Blue entries represent variability measurements.

10.2 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
2. Liquid tissue depth was at least 15.0 cm for all frequencies.
3. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units
4. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.

Bluetooth Notes:

1. Per October 2016 TCB Workshop Notes, the reported SAR was scaled to the 100 % transmission duty factor to determine compliance. Refer to section 8.1 for the time-domain plot and calculation for the duty factor of the device.

11. MEASUREMENT UNCERTAINTIES

2 450 MHz Head

Error Description	Uncertainty value (%)	Probability Distribution	Divisor	(Ci) 1 g	(Ci) 10 g	Standard 1 g (%)	Standard 10 g (%)	vi 2 or Veff
Measurement System								
Probe calibration	6.0	Normal	1	1	1	6.0	6.0	∞
Axial isotropy	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Hemispherical isotropy	9.6	Rectangular	√3	1	1	5.5	5.5	∞
Boundary Effects	0.8	Rectangular	√3	1	1	0.46	0.46	∞
Probe Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Probe modulation response	2.4	Rectangular	√3	1	1	1.4	1.4	∞
Detection limits	0.25	Rectangular	√3	1	1	0.14	0.14	∞
Readout Electronics	1.0	Normal	1	1	1	1.0	1.0	∞
Response time	0.8	Rectangular	√3	1	1	0.46	0.46	∞
Integration time	2.6	Rectangular	√3	1	1	1.5	1.5	∞
RF Ambient Conditions – Noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF Ambient Conditions – Reflections	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe Positioner	0.4	Rectangular	√3	1	1	0.23	0.23	∞
Probe Positioning	2.9	Rectangular	√3	1	1	1.7	1.7	∞
Spatial x-y-Resolution	3.0	Rectangular	√3	1	1	5.8	5.8	∞
Fast SAR z-Approximation	3.0	Rectangular	√3	1	1	4.0	4.0	
Test Sample Related								
Device Positioning	2.9	Normal	1	1	1	2.9	2.9	145
Device Holder	3.6	Normal	1	1	1	3.6	3.6	5
Power Drift	5.0	Rectangular	√3	1	1	2.9	2.9	∞
SAR Scaling	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Physical Parameters								
Phantom Shell	7.6	Rectangular	√3	1	1	4.4	4.4	∞
Liquid conductivity (Target)	5.0	Rectangular	√3	0.64	0.43	1.8	1.2	∞
Liquid conductivity (Meas.)	4.1	Normal	1	0.78	0.71	3.2	2.9	10
Liquid permittivity (Target)	5.0	Rectangular	√3	0.60	0.49	1.7	1.4	∞
Liquid permittivity (Meas.)	4.0	Normal	1	0.23	0.26	0.92	1.0	10
Temp. unc. - Conductivity	2.0	Rectangular	√3	0.78	0.71	0.90	0.82	∞
Temp. unc. - Permittivity	2.0	Rectangular	√3	0.23	0.26	0.27	0.30	∞
Combined Standard Uncertainty						**13**	**13**	330
Expanded Uncertainty (k=2)						**26**	**26**	

$U(1\ g) = k \cdot u_c$
= 2 · 13 %
= 26 % (The confidence level is about 95 % k = 2)
$U(10\ g) = k \cdot u_c$
= 2 · 13 %
= 26 % (The confidence level is about 95 % k = 2)

13. CONCLUSION

Measurement Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC. These measurements are taken to simulate the RF effects exposure under the worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are every complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role impossible biological effect are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease).

Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.

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Attachment 1. – Probe Calibration Data

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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

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

Accreditation No.: **SCS 0108**

Client **DT&C (Dymstec)** Certificate No: **EX3-3930_Jul21**

CALIBRATION CERTIFICATE

Object	EX3DV4 - SN:3930
Calibration procedure(s)	QA CAL-01.v9, QA CAL-14.v6, QA CAL-23.v5, QA CAL-25.v7 Calibration procedure for dosimetric E-field probes
Calibration date:	July 26, 2021

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	09-Apr-21 (No. 217-03291/03292)	Apr-22
Power sensor NRP-Z91	SN: 103244	09-Apr-21 (No. 217-03291)	Apr-22
Power sensor NRP-Z91	SN: 103245	09-Apr-21 (No. 217-03292)	Apr-22
Reference 20 dB Attenuator	SN: CC2552 (20x)	09-Apr-21 (No. 217-03343)	Apr-22
DAE4	SN: 660	23-Dec-20 (No. DAE4-660_Dec20)	Dec-21
Reference Probe ES3DV2	SN: 3013	30-Dec-20 (No. ES3-3013_Dec20)	Dec-21
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-20)	In house check: Jun-22
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-20)	In house check: Jun-22
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-20)	In house check: Oct-21

	Name	Function	Signature
Calibrated by:	Michael Weber	Laboratory Technician	M.Weber
Approved by:	Katja Pokovic	Technical Manager	[signature]

Issued: July 30, 2021

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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

Accreditation No.: **SCS 0108**

Glossary:

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

Calibration is Performed According to the Following Standards:

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

Methods Applied and Interpretation of Parameters:

- *NORMx,y,z:* Assessed for E-field polarization ϑ = 0 (f ≤ 900 MHz in TEM-cell; f > 1800 MHz: R22 waveguide). NORMx,y,z are only intermediate values, i.e., the uncertainties of NORMx,y,z does not affect the E^2-field uncertainty inside TSL (see below *ConvF*).
- *NORM(f)x,y,z = NORMx,y,z * frequency_response* (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of *ConvF*.
- *DCPx,y,z:* DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- *PAR:* PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- *Ax,y,z; Bx,y,z; Cx,y,z; Dx,y,z; VRx,y,z: A, B, C, D* are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. *VR* is the maximum calibration range expressed in RMS voltage across the diode.
- *ConvF and Boundary Effect Parameters:* Assessed in flat phantom using E-field (or Temperature Transfer Standard for f ≤ 800 MHz) and inside waveguide using analytical field distributions based on power measurements for f > 800 MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to *NORMx,y,z * ConvF* whereby the uncertainty corresponds to that given for *ConvF*. A frequency dependent *ConvF* is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- *Spherical isotropy (3D deviation from isotropy)*: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- *Sensor Offset*: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- *Connector Angle*: The angle is assessed using the information gained by determining the *NORMx* (no uncertainty required).

DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu V/(V/m)^2$)[A]	0.38	0.37	0.43	± 10.1 %
DCP (mV)[B]	105.8	103.4	102.6	

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB√μV	C	D dB	VR mV	Max dev.	Unc[E] (k=2)
0	CW	X	0.0	0.0	1.0	0.00	123.7	± 3.5 %	± 4.7 %
		Y	0.0	0.0	1.0		123.8		
		Z	0.0	0.0	1.0		126.3		

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

[A] The uncertainties of Norm X,Y,Z do not affect the E^2-field uncertainty inside TSL (see Page 5).
[B] Numerical linearization parameter: uncertainty not required.
[E] Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	-82.5
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm

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

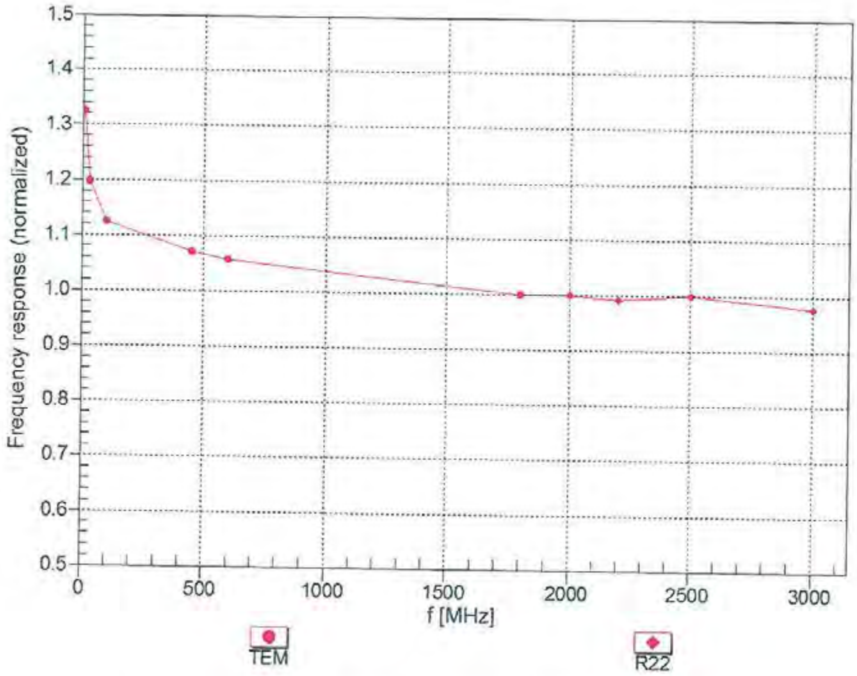
DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) [C]	Relative Permittivity [F]	Conductivity (S/m) [F]	ConvF X	ConvF Y	ConvF Z	Alpha [G]	Depth [G] (mm)	Unc (k=2)
1450	40.5	1.20	8.78	8.78	8.78	0.38	0.80	± 12.0 %
2450	39.2	1.80	7.69	7.69	7.69	0.39	0.90	± 12.0 %
2600	39.0	1.96	7.56	7.56	7.56	0.41	0.90	± 12.0 %
3500	37.9	2.91	6.85	6.85	6.85	0.30	1.30	± 13.1 %
3700	37.7	3.12	6.70	6.70	6.70	0.30	1.30	± 13.1 %
5200	36.0	4.66	5.60	5.60	5.60	0.40	1.80	± 13.1 %
5300	35.9	4.76	5.38	5.38	5.38	0.40	1.80	± 13.1 %
5500	35.6	4.96	5.00	5.00	5.00	0.40	1.80	± 13.1 %
5600	35.5	5.07	4.90	4.90	4.90	0.40	1.80	± 13.1 %
5800	35.3	5.27	4.85	4.85	4.85	0.40	1.80	± 13.1 %

[C] Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.
[F] At frequencies below 3 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.
[G] Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

Frequency Response of E-Field
(TEM-Cell:ifi110 EXX, Waveguide: R22)

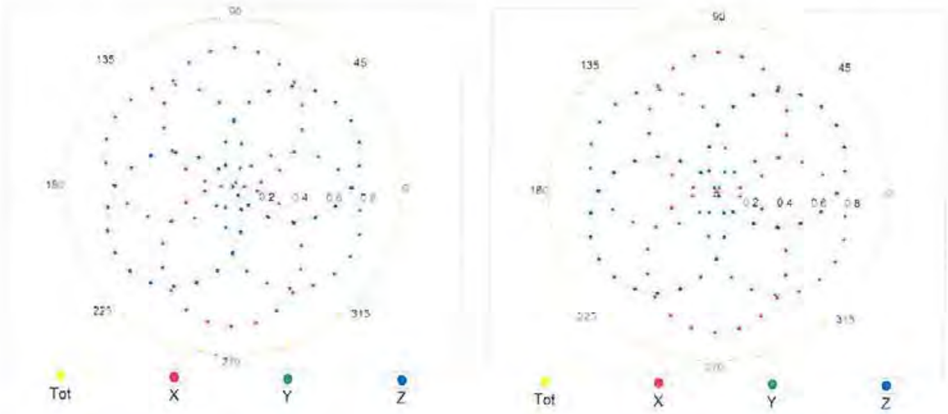


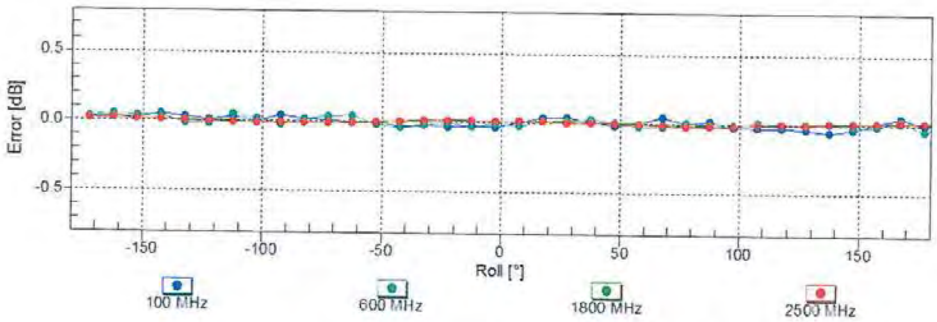
Uncertainty of Frequency Response of E-field: ± 6.3% (k=2)

EX3DV4– SN:3930 July 26, 2021

Receiving Pattern (φ), ϑ = 0°

f=600 MHz,TEM f=1800 MHz,R22

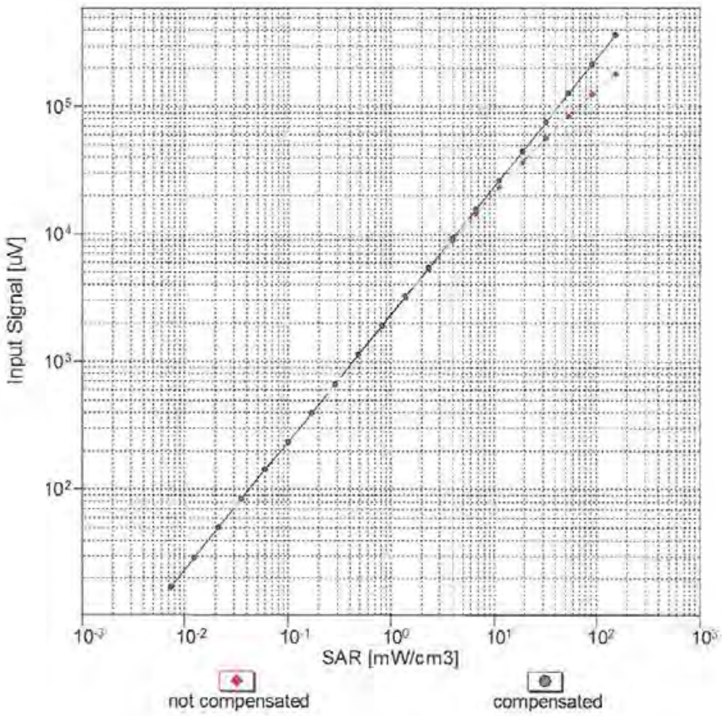


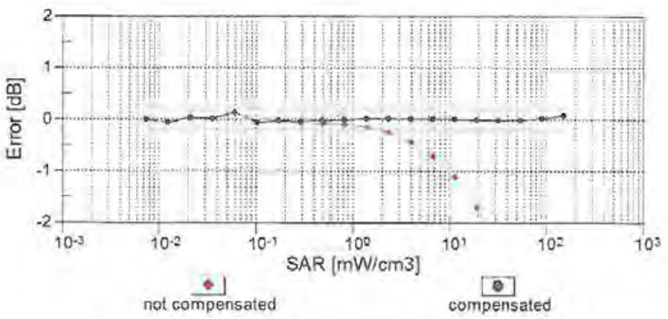


Uncertainty of Axial Isotropy Assessment: ± 0.5% (k=2)

Dynamic Range f(SAR_{head})

(TEM cell , f_{eval}= 1900 MHz)





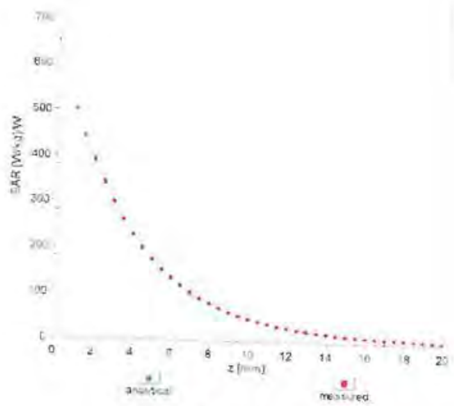
Uncertainty of Linearity Assessment: ± 0.6% (k=2)

EX3DV4– SN:3930

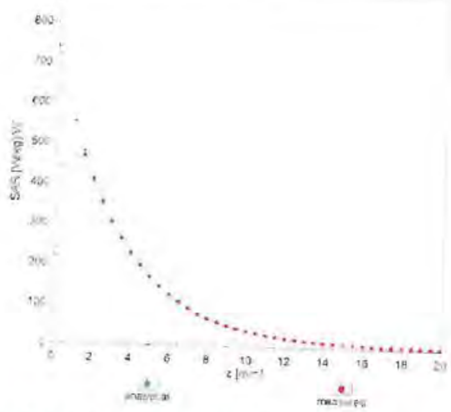
July 26, 2021

Conversion Factor Assessment

f = 5200 MHz,WGLS R58 (H_convF)-SCS

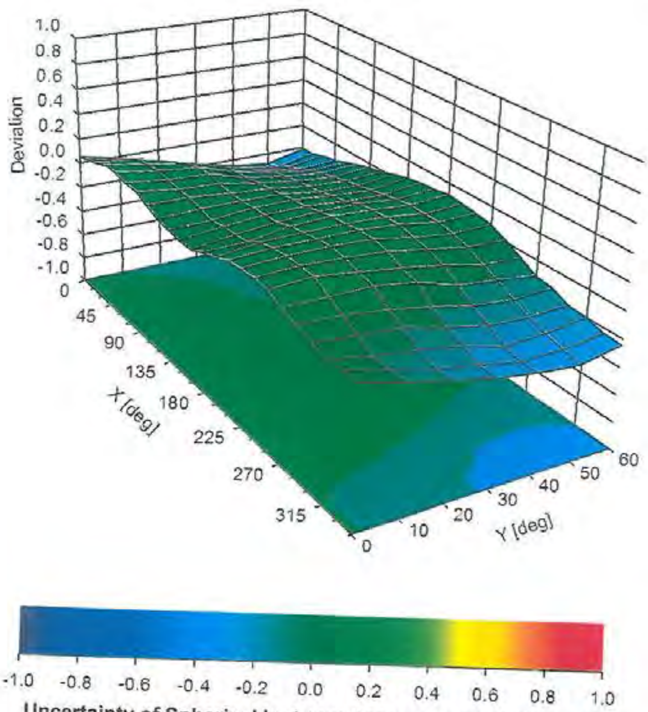


f = 5800 MHz,WGLS R58 (H_convF)-SCS



Deviation from Isotropy in Liquid

Error (ϕ, ϑ), f = 900 MHz



Uncertainty of Spherical Isotropy Assessment: ± 2.6% (k=2)

Certificate No: EX3-3930_Jul21 Page 9 of 9

Attachment 2. – Dipole Calibration Data

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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

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

Accreditation No.: **SCS 0108**

Client **DT&C (Dymstec)**

Certificate No: **D2450V2-726_Sep21**

CALIBRATION CERTIFICATE

Object	D2450V2 - SN:726
Calibration procedure(s)	QA CAL-05.v11 Calibration Procedure for SAR Validation Sources between 0.7-3 GHz
Calibration date:	September 22, 2021

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	09-Apr-21 (No. 217-03291/03292)	Apr-22
Power sensor NRP-Z91	SN: 103244	09-Apr-21 (No. 217-03291)	Apr-22
Power sensor NRP-Z91	SN: 103245	09-Apr-21 (No. 217-03292)	Apr-22
Reference 20 dB Attenuator	SN: BH9394 (20k)	09-Apr-21 (No. 217-03343)	Apr-22
Type-N mismatch combination	SN: 310982 / 06327	09-Apr-21 (No. 217-03344)	Apr-22
Reference Probe EX3DV4	SN: 7349	28-Dec-20 (No. EX3-7349_Dec20)	Dec-21
DAE4	SN: 601	02-Nov-20 (No. DAE4-601_Nov20)	Nov-21

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB39512475	30-Oct-14 (in house check Oct-20)	In house check: Oct-22
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-20)	In house check: Oct-22
Power sensor HP 8481A	SN: MY41092317	07-Oct-15 (in house check Oct-20)	In house check: Oct-22
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-20)	In house check: Oct-22
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-20)	In house check: Oct-21

	Name	Function	Signature
Calibrated by:	Jeton Kastrati	Laboratory Technician	
Approved by:	Katja Pokovic	Technical Manager	

Issued: September 22, 2021

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

Certificate No: D2450V2-726_Sep21 Page 1 of 8

Calibration Laboratory of
Schmid & Partner
Engineering AG
Zeughausstrasse 43, 8004 Zurich, Switzerland

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

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

Accreditation No.: **SCS 0108**

Glossary:

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

Calibration is Performed According to the Following Standards:

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

Additional Documentation:

c) DASY System Handbook

Methods Applied and Interpretation of Parameters:

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

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

Measurement Conditions

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

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

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	**Permittivity**	**Conductivity**
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	37.7 ± 6 %	1.87 mho/m ± 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm^3 (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	13.3 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**51.8 W/kg ± 17.0 % (k=2)**

SAR averaged over 10 cm^3 (10 g) of Head TSL	condition	
SAR measured	250 mW input power	6.20 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	**24.4 W/kg ± 16.5 % (k=2)**

Body TSL parameters

The following parameters and calculations were applied.

	Temperature	**Permittivity**	**Conductivity**
Nominal Body TSL parameters	22.0 °C	52.7	1.95 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	52.2 ± 6 %	2.05 mho/m ± 6 %
Body TSL temperature change during test	< 0.5 °C	----	----

SAR result with Body TSL

SAR averaged over 1 cm^3 (1 g) of Body TSL	Condition	
SAR measured	250 mW input power	13.4 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	**52.3 W/kg ± 17.0 % (k=2)**

SAR averaged over 10 cm^3 (10 g) of Body TSL	condition	
SAR measured	250 mW input power	6.27 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	**24.7 W/kg ± 16.5 % (k=2)**

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	52.3 Ω + 4.5 jΩ
Return Loss	- 26.1 dB

Antenna Parameters with Body TSL

Impedance, transformed to feed point	49.1 Ω + 7.5 jΩ
Return Loss	- 22.4 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.160 ns

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

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.
No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG

DASY5 Validation Report for Head TSL

Date: 22.09.2021

Test Laboratory: SPEAG, Zurich, Switzerland

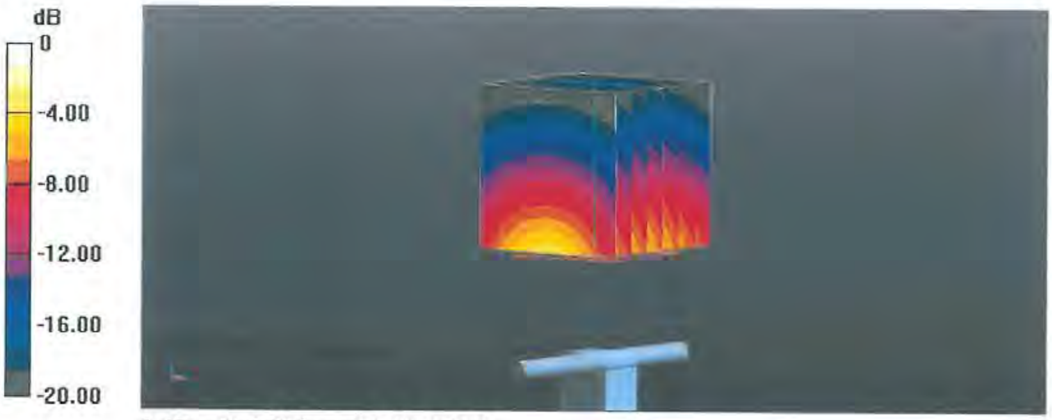
DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:726

Communication System: UID 0 - CW; Frequency: 2450 MHz
Medium parameters used: f = 2450 MHz; σ = 1.87 S/m; ε_r = 37.7; ρ = 1000 kg/m^3
Phantom section: Flat Section
Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

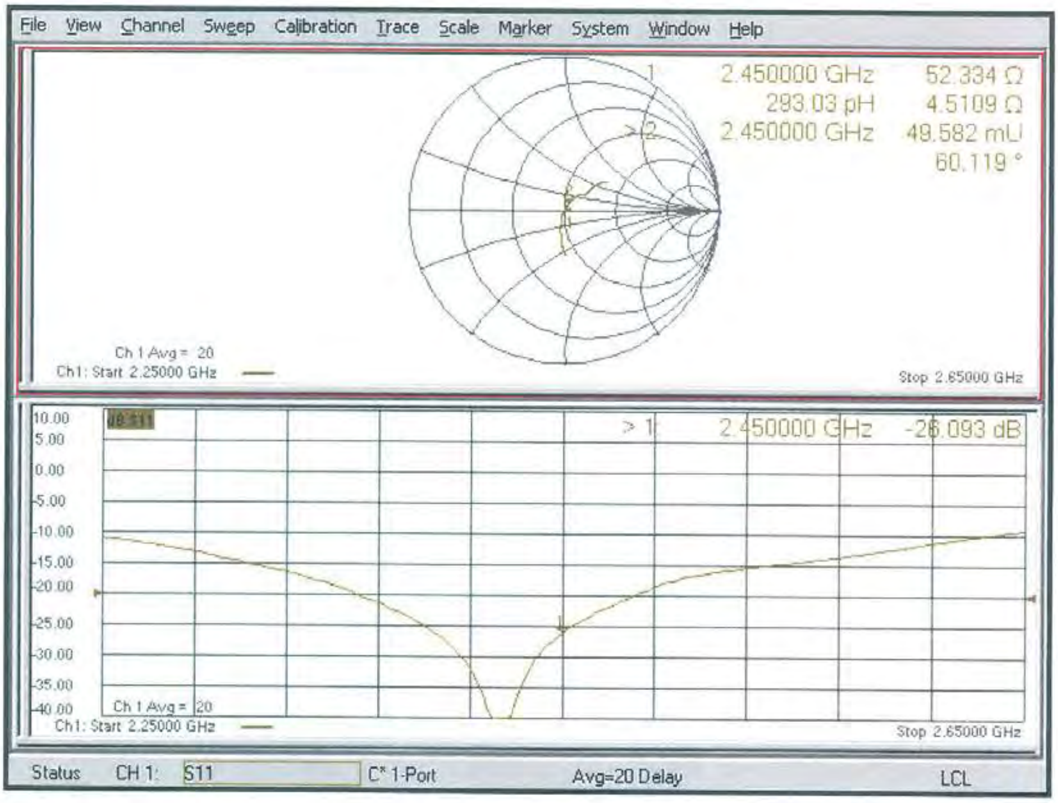
- Probe: EX3DV4 - SN7349; ConvF(7.96, 7.96, 7.96) @ 2450 MHz; Calibrated: 28.12.2020
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 02.11.2020
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.4(1535); SEMCAD X 14.6.14(7501)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:
Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 115.9 V/m; Power Drift = -0.05 dB
Peak SAR (extrapolated) = 26.2 W/kg
SAR(1 g) = 13.3 W/kg; SAR(10 g) = 6.2 W/kg
Smallest distance from peaks to all points 3 dB below = 9 mm
Ratio of SAR at M2 to SAR at M1 = 51%
Maximum value of SAR (measured) = 21.9 W/kg



0 dB = 21.9 W/kg = 13.40 dBW/kg

Impedance Measurement Plot for Head TSL



DASY5 Validation Report for Body TSL

Date: 22.09.2021

Test Laboratory: SPEAG, Zurich, Switzerland

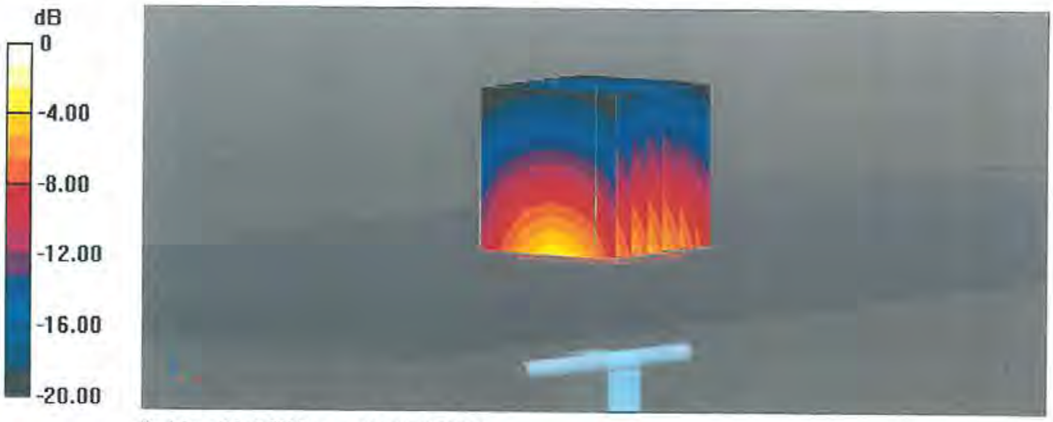
DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN:726

Communication System: UID 0 - CW; Frequency: 2450 MHz
Medium parameters used: f = 2450 MHz; σ = 2.05 S/m; ε_r = 52.2; ρ = 1000 kg/m^3
Phantom section: Flat Section
Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

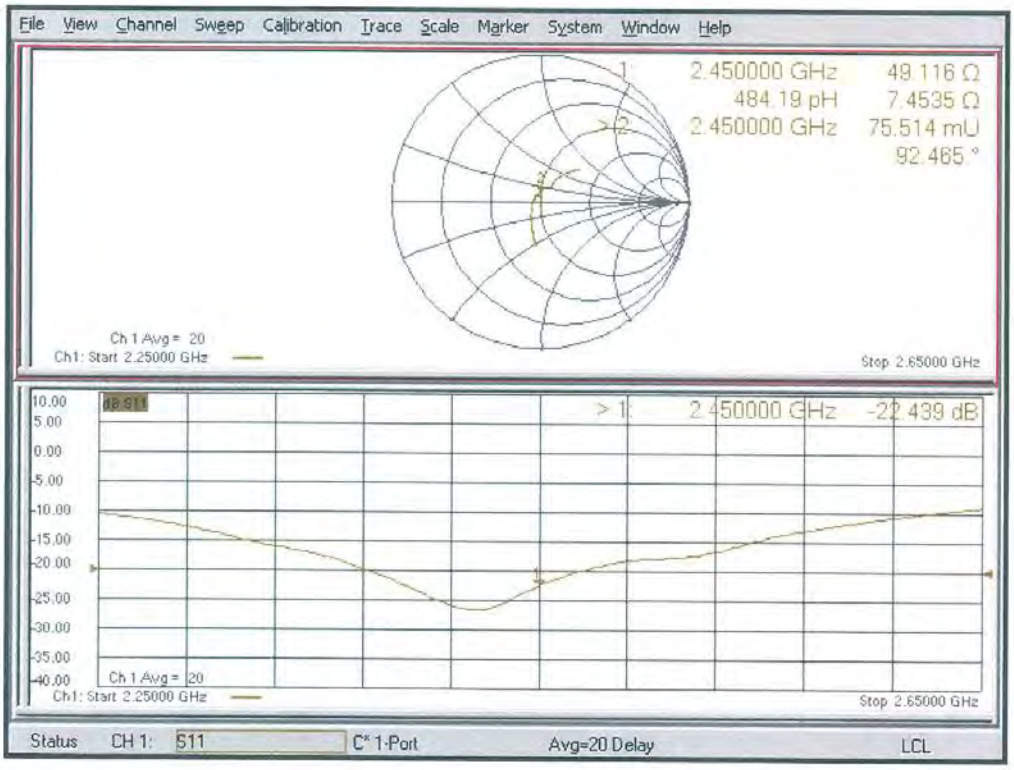
- Probe: EX3DV4 - SN7349; ConvF(8.12, 8.12, 8.12) @ 2450 MHz; Calibrated: 28.12.2020
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 02.11.2020
- Phantom: Flat Phantom 5.0 (back); Type: QD 000 P50 AA; Serial: 1002
- DASY52 52.10.4(1535); SEMCAD X 14.6.14(7501)

Dipole Calibration for Body Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:
Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 109.8 V/m; Power Drift = -0.08 dB
Peak SAR (extrapolated) = 25.1 W/kg
SAR(1 g) = 13.4 W/kg; SAR(10 g) = 6.27 W/kg
Smallest distance from peaks to all points 3 dB below = 8.9 mm
Ratio of SAR at M2 to SAR at M1 = 54.3%
Maximum value of SAR (measured) = 21.1 W/kg



0 dB = 21.1 W/kg = 13.25 dBW/kg

Impedance Measurement Plot for Body TSL



Attachment 3. – SAR SYSTEM VALIDATION

SAR System Validation

Per FCC KDB 865664 D02v01r02, SAR system validation status should be documented to confirm measurement accuracy. The SAR systems (including SAR probes, system components and software versions) used for this device were validated against its performance specifications prior to the SAR measurements. Reference dipoles were used with the required tissue- equivalent media for system validation, according to the procedures outlined in FCC KDB 865664 D01v01r04 and IEEE 1528-2013.Since SAR probe calibrations are frequency dependent, each probe calibration point was validated at a frequency within the valid frequency range of the probe calibration point, using the system that normally operates with the probe for routine SAR measurements and according to the required tissue-equivalent media.

A tabulated summary of the system validation status including the validation date(s), measurement frequencies, SAR probes and tissue dielectric parameters has been included.

Table Attachment 3.1 SAR System Validation Summary

SAR System	Freq. [MHz]	Date	Probe S/N	Probe Type	Probe CAL. Point		PERM.	COND.	CW Validation			MOD. Validation		
							(εr)	(σ)	Sensi-tivity	Probe Linearity	Probe Isortopy	MOD. Type	Duty Factor	PAR
C	2 450	2021.09.28	3930	EX3DV4	2 450	Head	39.484	1.828	PASS	PASS	PASS	OFDM	PASS	PASS

NOTE: While the probes have been calibrated for both a CW and modulated signals, all measurements were performed using communication systems calibrated for CW signals only. Modulations in the table above represent test configurations for which the measurement system has been validated per FCC KDB Publication 865664 D01v01r04 for scenarios when CW probe calibrations are used with other signal types. SAR systems were validated for modulated signals with a periodic duty cycle, such as GMSK, or with a 0high peak to average ratio (> 5 dB), such as OFDM according to KDB 865664.