REPORT No. : SZ18050057S01

SAR TEST REPORT

APPLICANT	**:**	CPS Telecom Limited
PRODUCT NAME	**:**	Walkie Talkie
MODEL NAME	**:**	CP229
BRAND NAME	**:**	CPS
FCC ID	**:**	V49CP229
STANDARD(S)	**:**	47 CFR §2.1093 IEEE 1528-2013
TEST DATE	**:**	2018-05-23
ISSUE DATE	**:**	2018-05-25

Tested by: Gan Yueming

Gan Yueming(Test engineer)

Approved by: Peng Huarui

Peng Huarui (Supervisor)

DIRECTORY

Change History		
Issue	**Date**	**Reason for change**
1.0	2018-05-25	First edition

1. Technical Information

Note: Provide by manufacturer.

1.1. Applicant and Manufacturer Information

Applicant:	CPS Telecom Limited
Applicant Address:	15B Floor, King Palace Plaza, 55 King Yip Street Kwun Tong, Kowloon, Hong Kong
Manufacturer:	CPS Telecom Limited
Manufacturer Address:	15B Floor, King Palace Plaza, 55 King Yip Street Kwun Tong, Kowloon, Hong Kong

1.2. Equipment Under Test (EUT) Description

Model Name:	CP229		
Brand Name:	CPS		
Hardware Version:	N/A		
Software Version:	N/A		
Frequency Bands:	462/467MHz		
The Highest Reported 1g-SAR(W/kg)	Body-worn	0.246W/kg (75% duty cycle)	Limit: 1.6 W/kg
	Held to face	0.182W/kg (75% duty cycle)	

Note: For a more detailed description, please refer to specification or user's manual supplied by the applicant and/or manufacturer.

1.3. Photographs of the EUT

Please refer to the External Photos for the Photos of the EUT

1.4. Applied Reference Documents

Leading reference documents for testing:

No.	Identity	Document Title
1	**47 CFR §2.1093**	Radiofrequency Radiation Exposure Evaluation: Portable Devices
2	**IEEE 1528-2013**	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
3	**KDB 447498 D01v06**	General RF Exposure Guidance
4	**KDB 865664 D01v01r04**	SAR Measurement 100 MHz to 6 GHz
5	**KDB 865664 D02v01r02**	SAR Reporting

2. Device Category and SAR 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.

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

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

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 applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The 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.

Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

Note: This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user. Limit for General uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

3. Specific Absorption Rate (SAR)

3.1. Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an 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 general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are Middle than the limits for general population/uncontrolled.

3.2. SAR Definition

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 a given density. (ρ). The equation description is as below:

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

SAR is expressed in units of Watts per kilogram (W/kg)
SAR measurement can be either related to the temperature elevation in tissue by,

$$\mathbf{SAR} = \mathbf{C}\left(\frac{\boldsymbol{\delta}\mathbf{T}}{\boldsymbol{\delta}\mathbf{t}}\right)$$

Where C is the specific head capacity, δT is the temperature rise and δt the exposure duration, or related to the electrical field in the tissue by

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

Where σ is the conductivity of the tissue, ρ is the mass density of the tissue and $|E|$ is the rmselectrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

4. SAR Measurement Setup

4.1. The Measurement System

Como SAR is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Como SAR system consists of the Following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The Following figure shows the system.

The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

4.2. Probe

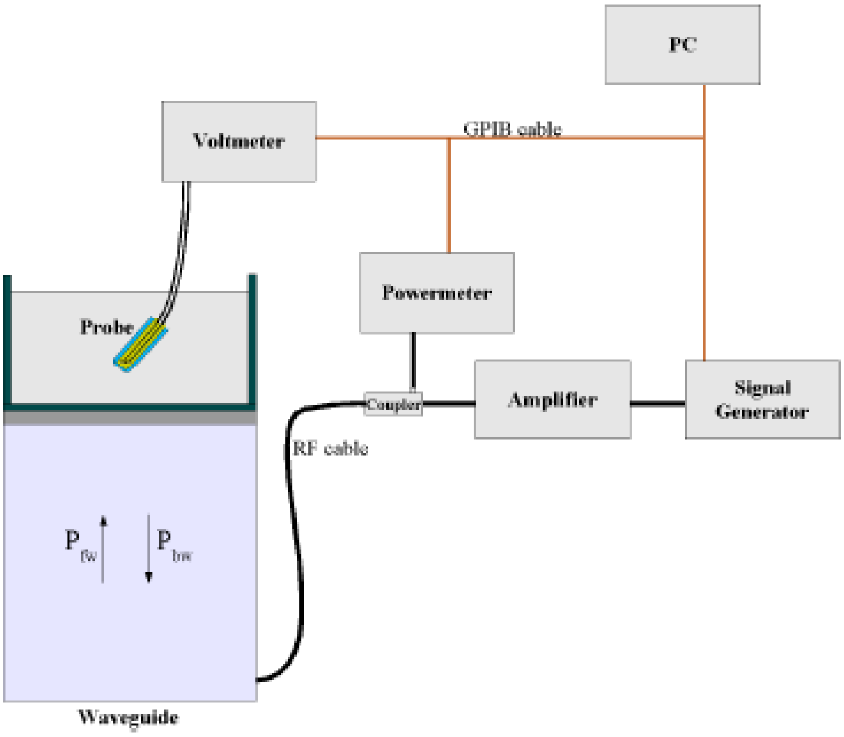
For the measurements the Specific Dosimetric E-Field Probe SN 37/08 EP80 with Following specifications is used

- Dynamic range: 0.01-100 W/kg

- Tip Diameter: 6.5 mm
- Distance between probe tip and sensor center: 2.5mm
- Distance between sensor center and the inner phantom surface: 4 mm
  (repeatability better than +/- 1mm)
- Probe linearity: <0.25 dB
- Axial Isotropy: <0.25 dB
- Spherical Isotropy: <0.25 dB
- Calibration range: 835to 2500MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and surface normal line: less than 30°

Probe calibration is realized, in compliance with CENELEC EN 62209 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 622091 annex technique using reference guide at the five frequencies.



$$SAR = \frac{4\left(P_{fw} - P_{bw}\right)}{ab\delta} \cos^2\left(\pi \frac{y}{a}\right) e^{(2z/\delta)}$$

Where :

Pfw = Forward Power

Pbw = Backward Power

a and b = Waveguide dimensions

ı = Skin depth

Keithley configuration:

Rate = Medium; Filter =ON; RDGS=10; FILTER TYPE =MOVING AVERAGE; RANGE AUTO
After each calibration, a SAR measurement is performed on a validation dipole and compared with aNPL calibrated probe, to verify it.

The calibration factors, CF(N), for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N)=SAR(N)/Vlin(N) \qquad (N=1,2,3)$$

The linearised output voltage Vlin(N) is obtained from the displayed output voltage V(N) using

$$Vlin(N)=V(N)*(1+V(N)/DCP(N)) \qquad (N=1,2,3)$$

Where DCP is the diode compression point in mV.

4.3. Probe Calibration Process

Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm^2) using an with CALISAR, Antenna proprietary calibration system.

Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm^2.

Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulating head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

Where:

δt = exposure time (30 seconds),

C = heat capacity of tissue (brainor muscle),

δT = temperature increase due to RF exposure.

SAR is proportional to $\Delta T/\Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

Where:

σ = simulated tissue conductivity,

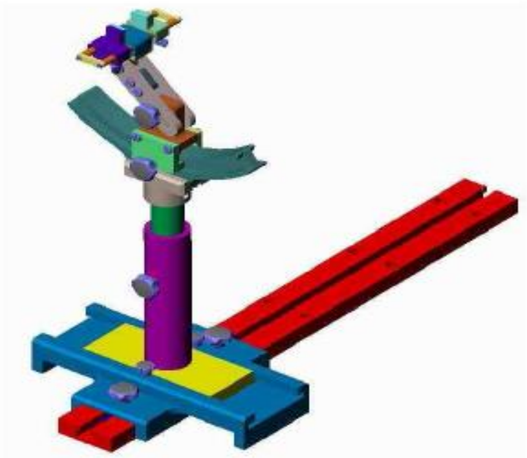
ρ = Tissue density (1.25 g/cm^3 for brain tissue)

4.4. Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

4.5. Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is Middle than 1°.



Device holder

System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

5. Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with Homogeneous tissue simulating liquid to a depth of at least 15cm. For head SAR testing, the liquid height from the ear reference point(ERP) of the phantom to the liquid top surface is larger than 15cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in below table.

The following table gives the recipes for tissue simulating liquids

Frequency Band (MHz)	450.00	
Tissue Type	Head	Body
Ingredients (% by weight)		
Deionised Water	38.56	51.16
Salt(NaCl)	3.95	1.49
Sugar	56.32	46.78
Tween 20	0.0	0.0
HEC	0.98	0.52
Bactericide	0.19	0.05
Triton X-100	0.0	0.0
DGBE	0.0	0.0
Diethylenglycol monohexylether	0.0	0.0
Measured dielectric parameters		
Dielectric Constant	43.42	58.0
Conductivity (S/m)	0.85	0.83

Note: Please refer to the validation results for dielectric parameters of each frequency band.

The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using an Agilent 85033E Dielectric Probe Kit and an Agilent Network Analyzer.

Table 1: Dielectric Performance of Tissue Simulating Liquid

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Conductivity Target (σ)	Delta (σ) (%)	Date
450	HSL	21.8	0.847	0.87	-2.64	2018.5.23
450	MSL	21.8	0.974	0.94	3.62	2018.5.23
Frequency (MHz)	**Tissue Type**	**Liquid Temp. (℃)**	**Permittivity (εr)**	**Permittivity Target (εr)**	**Delta (εr) (%)**	**Date**
450	HSL	21.8	43.486	43.50	-0.03	2018.5.23
450	MSL	21.8	56.097	56.70	-1.06	2018.5.23

Corrected SAR Evaluation Table

Freq.(MHz)	Liquid Type	Cε	Δεr	Cσ	Δσ	ΔSAR
462.5625	Body	-0.21	-0.41	0.80	-3.29	-2.53
	Head	-0.21	-0.40	0.80	-2.41	-1.83
467.7125	Body	-0.21	-0.09	0.80	0.92	0.75
	Head	-0.21	-0.36	0.80	2.14	1.78
462.6750	Body	-0.21	-0.07	0.80	-2.27	-1.79
	Head	-0.21	0.17	0.80	-3.56	-2.87

$\Delta SAR = C_\varepsilon \Delta\varepsilon_r + C_\sigma \Delta\sigma$

$C_\varepsilon = -7.854\times10^{-4} f^3 + 9.402\times10^{-3} f^2 - 2.742\times10^{-2} f - 0.2026$

$C_\sigma = 9.804\times10^{-3} f^3 - 8.661\times10^{-3} f^2 + 2.981\times10^{-2} f + 0.7829$

Where

f is the frequency in GHz.

6. Uncertainty Assessment

The Following table includes the uncertainty table of the IEEE 1528. The values are determined by Antennessa.

6.1. Uncertainty Evaluation For EUT SAR Test

a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System									
Probe calibration	E.2.1	5.83	N	1	1	1	5.83	5.83	∞
Axial Isotropy	E.2.2	3.5	R	$\sqrt{3}$	1	1	2.02	2.02	∞
Hemispherical Isotropy	E.2.2	5.9	R	$\sqrt{3}$	1	1	3.41	3.41	∞
Boundary effect	E.2.3	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	E.2.4	4.7	R	$\sqrt{3}$	1	1	2.71	2.71	∞
System detection limits	E.2.5	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Readout Electronics	E.2.6	0.5	N	1	1	1	0.5	0.5	∞
Reponse Time	E.2.7	3.0	R	$\sqrt{3}$	1	1	3.0	3.0	∞
Integration Time	E.2.8	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
RF ambient Conditions	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	E.6.2	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to Phantom Shell	E.6.3	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Extrapolation, interpolation and integration Algoritms for Max. SAR Evaluation	E.5.2	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	∞
Test sample Related									
Test sample positioning	E.4.2.1	2.6	N	1	1	1	2.6	2.6	N-1
Device Holder Uncertainty	E.4.1.1	3.0	N	1	1	1	3.0	3.0	N-1
Output power Power drift -	6.6.2	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞

SAR drift measurement									
Phantom and Tissue Parameters									
Phantom Uncertainty (Shape and thickness tolerances)	E.3.1	4.0	R	$\sqrt{3}$	1	1	2.31	2.31	∞
Liquid conductivity - deviation from target value	E.3.2	2.0	R	$\sqrt{3}$	0.64	0.43	1.69	1.13	∞
Liquid conductivity - measurement uncertainty	E.3.3	2.5	N	1	0.64	0.43	3.20	2.15	M
Liquid permittivity - deviation from target value	E.3.2	2.5	R	$\sqrt{3}$	0.6	0.49	1.28	1.04	∞
Liquid permittivity - measurement uncertainty	E.3.3	5.0	N	1	0.6	0.49	6.00	4.90	M
Liquid conductivity–temperature uncertainty	E.3.4		R	$\sqrt{3}$	0.78	0.41			∞
Liquidpermittivity–temperature uncertainty	E.3.4		R	$\sqrt{3}$	0.23	0.26			∞
Combined Standard Uncertainty			RSS				11.55	12.07	
Expanded Uncertainty (95% Confidence interval)			K=2				±23.20	±24.17	

6.2. Uncertainty For System Performance Check

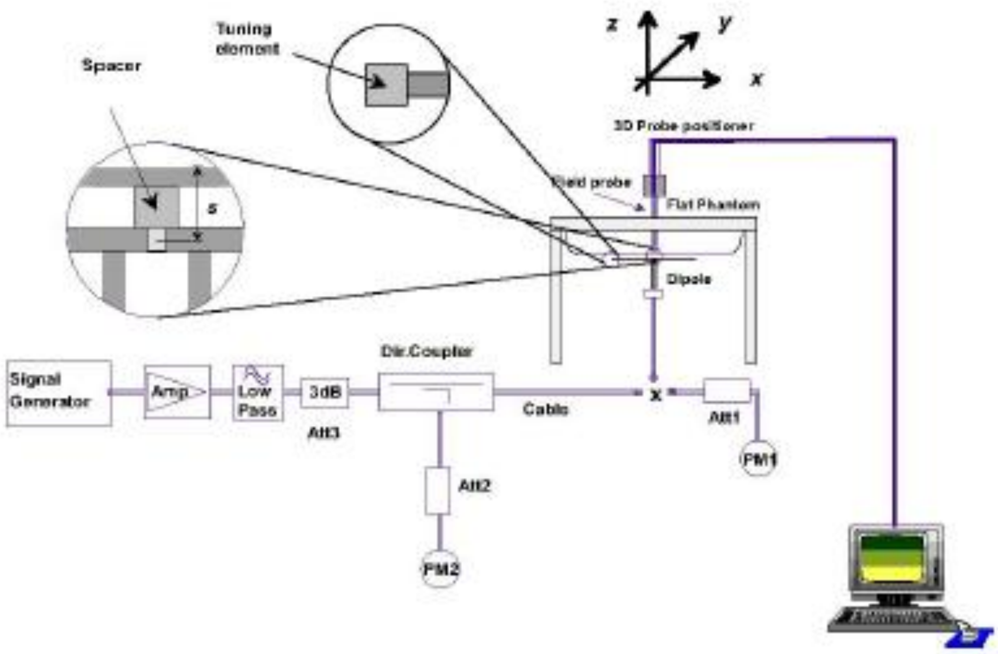
a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System									
Probe calibration	E.2.1	4.76	N	1	1	1	4.76	4.7	∞
Axial Isotropy	E.2.2	2.5	R	$\sqrt{3}$	0.7	0.7	1.01	1.0	∞
Hemispherical Isotropy	E.2.2	4.0	R	$\sqrt{3}$	0.7	0.7	1.62	1.6	∞
Boundary effect	E.2.3	1.0	R	$\sqrt{3}$	1	1	0.58	0.5	∞

Linearity	E.2.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.8	∞
System detection limits	E.2.5	1.0	R	$\sqrt{3}$	1	1	0.58	0.5	∞
Readout Electronics	E.2.6	0.02	N	1	1	1	0.02	0.0	∞
Reponse Time	E.2.7	3.0	R	$\sqrt{3}$	1	1	1.73	1.7	∞
Integration Time	E.2.8	2.0	R	$\sqrt{3}$	1	1	1.15	1.1	∞
RF ambient Conditions	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.7	∞
Probe positioner Mechanical Tolerance	E.6.2	2.0	R	$\sqrt{3}$	1	1	1.15	1.1 5	∞
Probe positioning with respect to Phantom Shell	E.6.3	0.05	R	$\sqrt{3}$	1	1	0.03	0.0 3	∞
Extrapolation, interpolation and integration Algoritms for Max. SAR Evaluation	E.5.2	5.0	R	$\sqrt{3}$	1	1	2.89	2.8 9	∞
Dipole									
Dipole axis to liquid Distance	8,E.4. 2	1.00	N	$\sqrt{3}$	1	1	0.58	0.5 8	∞
Input power and SAR drift measurement	8,6.6. 2	4.04	R	$\sqrt{3}$	1	1	2.33	2.3 3	∞
Phantom and Tissue Parameters									
Phantom Uncertainty (Shape and thickness tolerances)	E.3.1	0.05	R	$\sqrt{3}$	1	1	0.03	0.0 3	∞
Liquid conductivity - deviation from target value	E.3.2	4.57	R	$\sqrt{3}$	0.64	0.43	1.69	1.1 3	∞
Liquid conductivity - measurement uncertainty	E.3.3	5.00	N	$\sqrt{3}$	0.64	0.43	1.85	1.2 4	M
Liquid permittivity - deviation from target value	E.3.2	3.69	R	$\sqrt{3}$	0.6	0.49	1.28	1.0 4	∞
Liquid permittivity - measurement uncertainty	E.3.3	10.0 0	N	$\sqrt{3}$	0.6	0.49	3.46	2.8 3	M
Combined Standard Uncertainty			RSS				8.83	8.3 7	
Expanded Uncertainty (95% Confidence interval)			K=2				17.66	16. 73	

7. SAR Measurement Evaluation

7.1. System Setup

In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below



The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The power meter PM1 measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250mW is used for 700MHz to 3GHz, 100mW is used for 3.5GHz to 6 GHz) at the dipole connector and the power meter PM2 is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

7.2. Validation Results

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

<1g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2018.5.23	450	HSL	100	0.47	4.71	4.68	-0.64
2018.5.23	450	MSL	100	0.46	4.80	4.6	-4.17

<10g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2018.5.23	450	HSL	100	0.30	2.99	2.96	-1.00
2018.5.23	450	MSL	100	0.31	3.14	3.07	-2.23

Note: System checks the specific test data please see Annex C

8. Operational Conditions During Test

8.1. Information on the testing

The mobile phone antenna and battery are those specified by the manufacturer. The battery is fully charged before each measurement. The output power and frequency are controlled using a base station simulator. The mobile phone is set to transmit at its highest output peak power level.

The mobile phone is test in the “cheek” and “tilted” positions on the left and right sides of the phantom. The mobile phone is placed with the vertical centre line of the body of the mobile phone and the horizontal line crossing the centre of the earpiece in a plane parallel to the sagittal plane of the phantom.

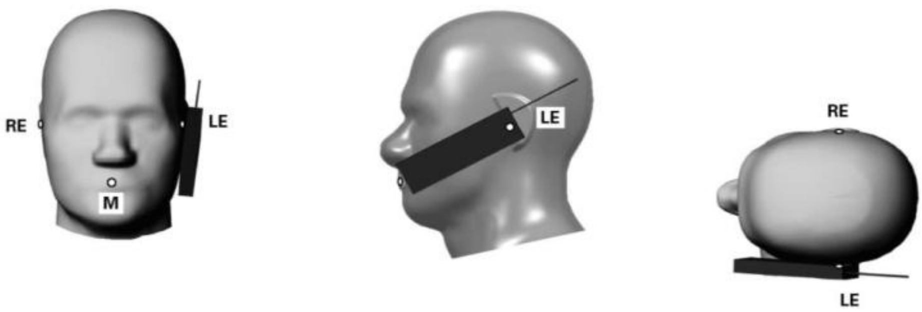


Illustration for Cheek Position

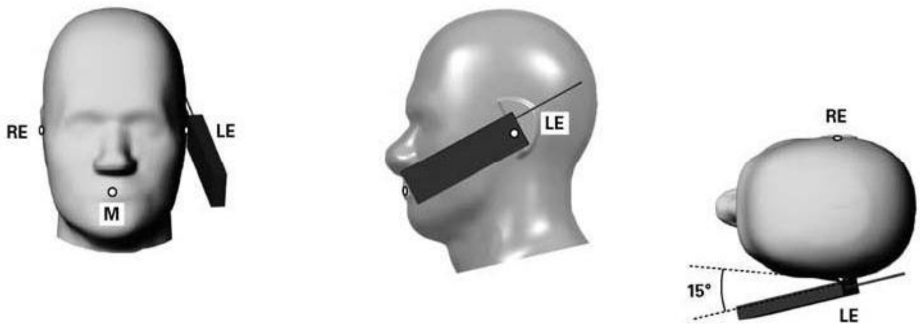


Illustration for Tilted Position

Description of the “cheek” position:

The mobile phone is well placed in the reference plane and the earpiece is in contact with the ear. Then the mobile phone is moved until any point on the front side get in contact with the cheek of the phantom or until contact with the ear is lost.

Description of the “tilted” position:

The mobile phone is well placed in the “cheek” position as described above. Then the mobile phone is moved outward away from the month by an angle of 15 degrees or until contact with the ear lost.

Remark: Please refer to Appendix B for the test setup photos.

8.2. Body-worn Configurations

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration.

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

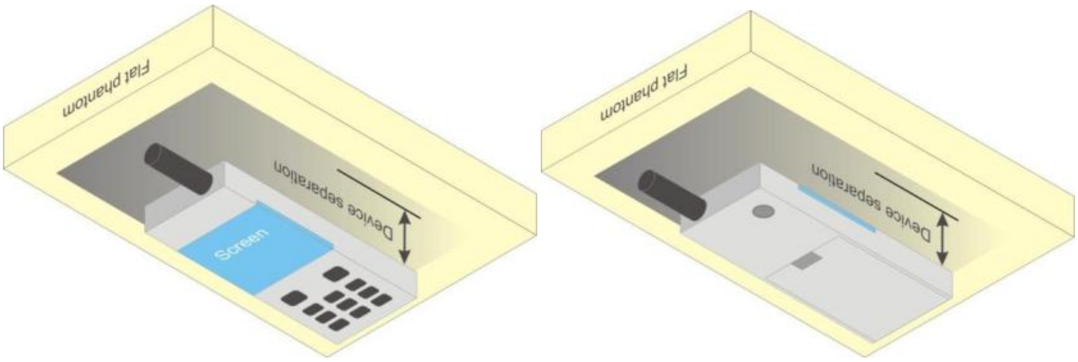


Illustration for Body-Worn Position

8.3. Measurement procedure

The Following steps are used for each test position

1. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface.
2. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
3. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.

4. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

8.4. Description of interpolation/extrapolation scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

9. Measurement of Conducted output power

Conducted average output power

Channel	Channel Description	Frequency	Output Power		Tune-up Limit
		MHz	dBm	W	dBm
1	FRS	462.5625	**27.276**	0.5341	28.0
2		462.5875	27.194	0.5241	28.0
3		462.6125	27.238	0.5294	28.0
4		462.6375	27.220	0.5272	28.0
5		462.6625	27.202	0.5250	28.0
6		462.6875	27.161	0.5201	28.0
7		462.7125	27.228	0.5282	28.0
8		467.5625	26.947	0.4951	28.0
9		467.5875	26.902	0.4900	28.0
10		467.6125	26.891	0.4888	28.0
11		467.6375	26.890	0.4887	28.0
12		467.6625	26.846	0.4837	28.0
13		467.6875	26.858	0.4851	28.0
14		467.7125	26.852	0.4844	28.0
15		462.55	27.196	0.5243	28.0
16		462.575	27.178	0.5222	28.0
17		462.6	27.158	0.5198	28.0
18		462.625	27.175	0.5218	28.0
19		462.65	27.150	0.5188	28.0
20		462.675	27.148	0.5186	28.0
21		462.7	27.161	0.5201	28.0
22		462.725	27.129	0.5163	28.0

10. Test Results List

Summary of Measurement Results (PTT 450MHz Band)

Plot No.	Band	Modulation	Test Position	Gap (mm)	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
1#	GSM450	FRS	Held to face	25mm	462.5625	27.28	28.00	1.181	0.75	**0.205**	**0.182**
	GSM450	FRS	Held to face	25mm	467.5625	26.95	28.00	1.274	0.75	0.169	0.162
	GSM450	FRS	Held to face	25mm	462.55	27.20	28.00	1.203	0.75	0.185	0.167
	GSM450	FRS	Body-worn	0mm	462.5625	27.28	28.00	1.181	0.75	0.208	0.184
2#	GSM450	FRS	Body-worn	0mm	467.5625	26.95	28.00	1.274	0.75	**0.257**	**0.246**
	GSM450	FRS	Body-worn	0mm	462.55	27.20	28.00	1.203	0.75	0.241	0.218

Note:

1. According to KDB 447498 D01v0602 a duty factor of 75% may be applied for PTT radios with Bluetooth or voice activated transmission capabilities to avoid the justification required for using a lower duty factor supported by certain features built-in within the radio. For analog PTT, only simplex communication technology was supported, so the SAR evaluation is needed to be corrected by Multiplying 75%.
2. The EUT is controlled to continue transmitting.
3. For SAR measurements, some SAR systems may have provisions to scale the measured results by means of “power scaling” to compute the 1-g SAR at a higher output power level.

$$\text{Scaling facor} = \frac{\text{Max output power(mW)}}{\text{SAR test channel Power(mW)}}$$

4. Head SAR is measured with the front surface of the radio position at 2.5 cm parallel to a flat phantom. Body SAR is measured with the radio placed in a body-worn accessory, positioned against a flat phantom, representative of the normal operating conditions expected by users and typically with a standard default audio accessory supplied with the radio.

END OF REPORT

Annex A General Information

1. Identification of the Responsible Testing Laboratory

Company Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Department:	Morlab Laboratory
Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China
Responsible Test Lab Manager:	Mr. Su Feng
Telephone:	+86 755 36698555
Facsimile:	+86 755 36698525

2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd. Morlab Laboratory
Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China

3. List of Test Equipments

No.	Instrument	Type	Cal. Date	Cal. Due
1	PC	Dell (Pentium IV 2.4GHz, SN:X10-23533)	(n.a)	(n.a)
2	Network Analyzer	Agilent(E5071B ,SN:MY42404762)	2017-7-5	1year
3	Voltmeter	Keithley (2000, SN:1000572)	2017-7-5	1year
4	Signal Generator	Rohde&Schwarz (SMP_02)	2017-7-5	1year
5	Power Amplifier	PRANA (Ap32 SV125AZ)	2017-7-5	1year
6	Power Meter	Agilent (E4416A, SN:MY45102093)	2017-7-5	1year
7	Power Sensor	Agilent (N8482A, SN:MY41091706)	2017-7-5	1year
8	Directional coupler	Giga-tronics(SN:1829112)	2017-7-5	1year
9	Probe	Satimo (SN:SN 37/08 EP80)	2017-7-5	1year
10	Dielectric Probe Kit	Agilent (85033E)	2017-7-5	1year
11	Phantom	Satimo (SN:SN_36_08_SAM62)	N/A	N/A
12	Liquid	Satimo(Last Calibration: 2018-05-23)	N/A	N/A
13	Dipole 450MHz	Satimo (SN 36/08 DIPB98)	2017-7-5	1year
14	Thermo meter	KTJ(mode-01)	2017-5-10	1year

Annex C Plots of System Performance Check

450MHz System Check Data(Head)

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm,dy=8mm

Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2018.05.23

Measurement duration: 13 minutes 27 seconds

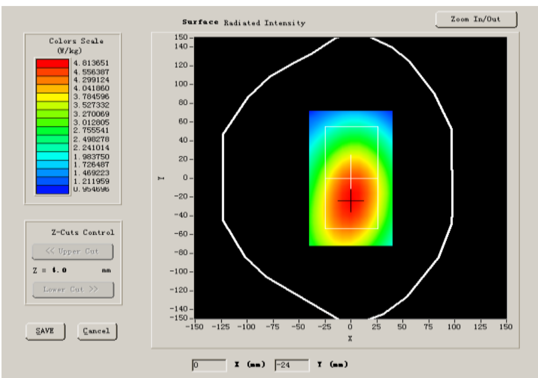
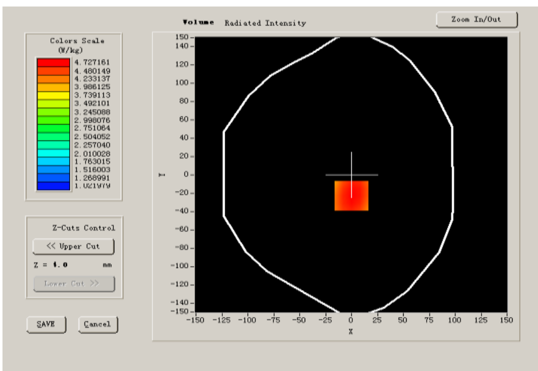
A. Experimental conditions.

Phantom File	surf_sam_plan.txt
Phantom	Validation plane
Device Position	
Band	450MHz
Channels	
Signal	CW

B. SAR Measurement Results

Band SAR

Frequency (MHz)	450.000000
Relative permittivity (real part)	43.485725
Conductivity (S/m)	0.846296
Power Drift (%)	1.253874
Ambient Temperature:	22.0°C
Liquid Temperature:	21.8°C
ConvF:	7.55
Crest factor:	1:1

SURFACE SAR	**VOLUME SAR**
	

450MHz System Check Data(Body)

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm,dy=8mm

Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2018.05.23

Measurement duration: 15 minutes 27 seconds

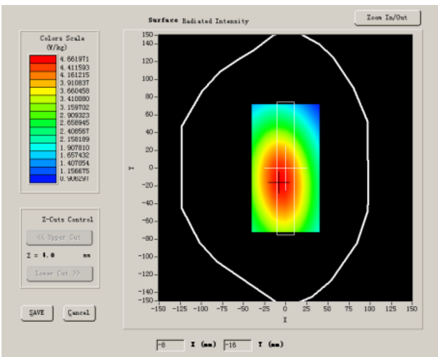
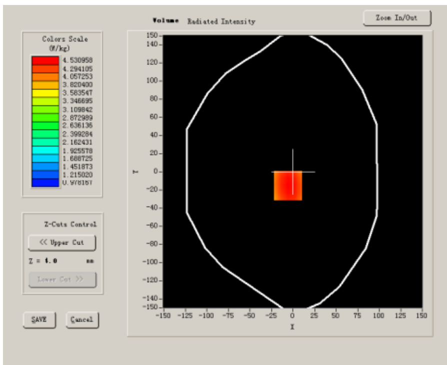
A. Experimental conditions.

Phantom File	surf_sam_plan.txt
Phantom	Validation plane
Device Position	
Band	450MHz
Channels	
Signal	CW

B. SAR Measurement Results

Band SAR

Frequency (MHz)	450.000000
Relative permittivity (real part)	56.097261
Conductivity (S/m)	0.973652
Power Drift (%)	0.170000
Ambient Temperature:	22.0°C
Liquid Temperature:	21.8°C
ConvF:	7.77
Crest factor:	1:1

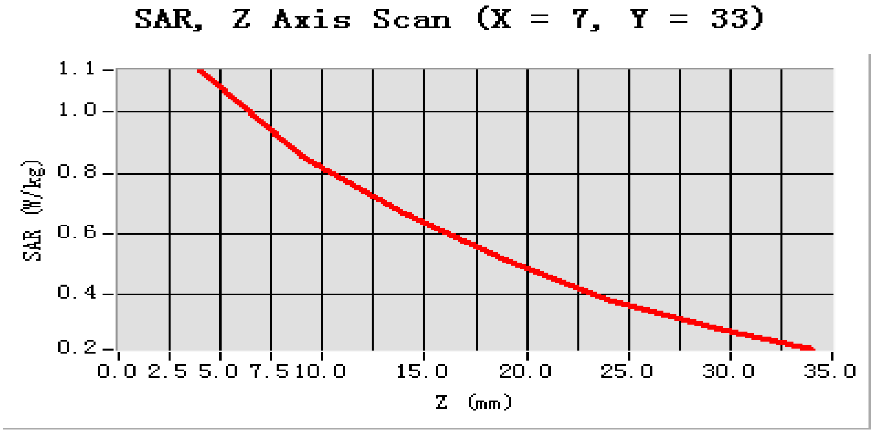
SURFACE SAR	VOLUME SAR
	

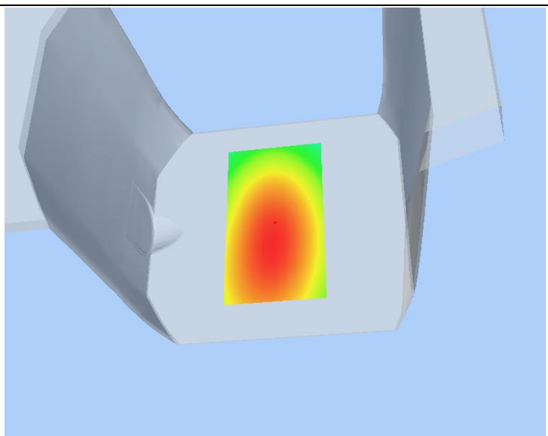
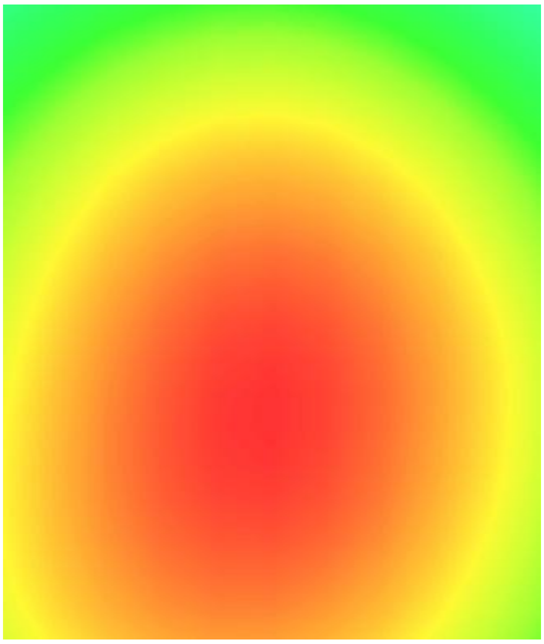
Maximum location: X=7.00, Y=33.00

SAR 10g (W/Kg)	0.302628
SAR 1g (W/Kg)	0.469257

Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.0000	1.1038	0.9671	0.7264	0.5926	0.3061	0.2140



3D sceen shot	Hot spot position
	

Annex D Plots of Maximum SAR Test Results

MEASUREMENT 1

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm,dy=8mm

Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2018.05.23

Measurement duration: 16 minutes 5 seconds

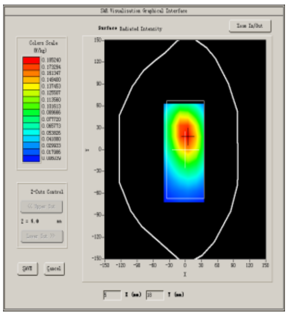
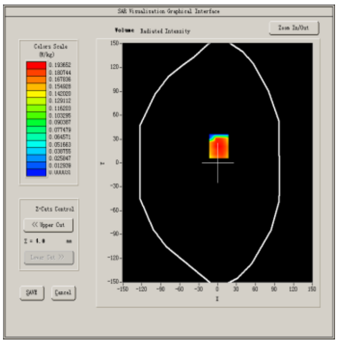
A. Experimental conditions.

Area Scan	surf_sam_plan.txt
Phantom	Flat
Device Position	Pust-to-Talk
Band	GSM450
Channels	Low
Signal	PTT

B. SAR Measurement Results

Lower Band SAR (Channel 1):

Frequency (MHz)	462.5625
Relative permittivity (real part)	43.21422
Conductivity (S/m)	0.852241
Power Drift (%)	-4.070000
Ambient Temperature:	22.0°C
Liquid Temperature:	21.8°C
ConvF:	7.55
Crest factor:	1:1

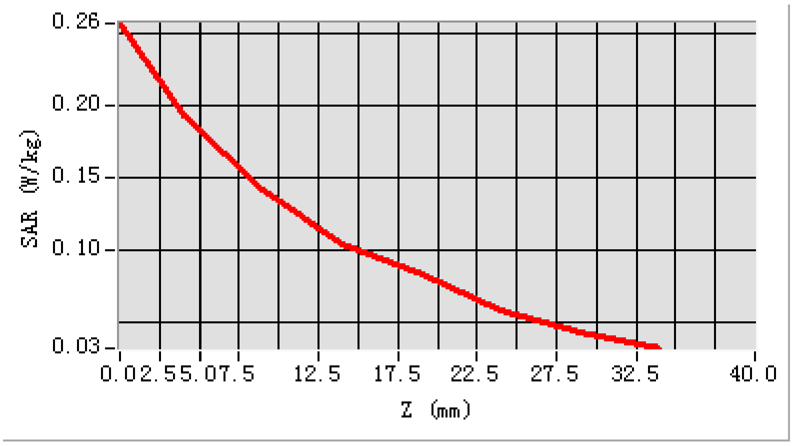
SURFACE SAR	VOLUME SAR
	

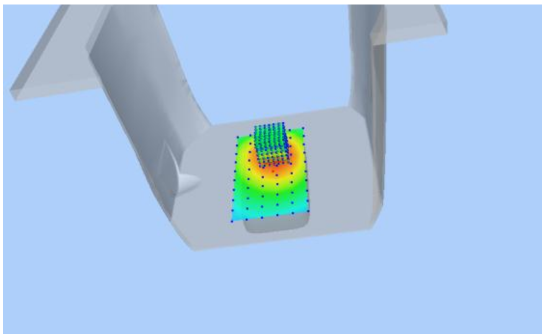
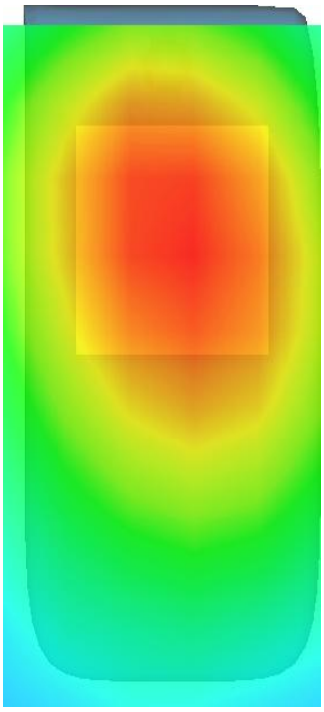
Maximum location: X=2.00, Y=21.00

SAR Peak: 0.57W/kg

SAR 10g (W/Kg)	0.119394
SAR 1g (W/Kg)	0.204577

Z (mm)	**0.00**	**4.00**	**9.00**	**14.00**	**19.00**	**24.00**	**29.00**
SAR (W/Kg)	**0.2572**	**0.1937**	**0.1426**	**0.1045**	**0.0839**	**0.0588**	**0.0430**



3D screen shot	**Hot spot position**
	

MEASUREMENT 2

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm,dy=8mm

Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2018.05.23

Measurement duration: 16 minutes 53 seconds

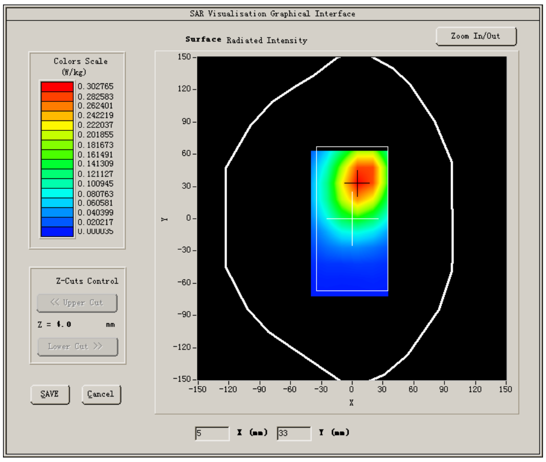
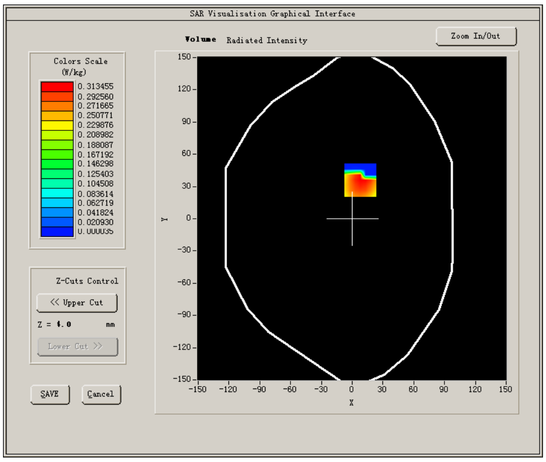
A. Experimental conditions.

Phantom File	surf_sam_plan.txt
Phantom	Flat
Device Position	Pust-to-Talk
Band	GSM450
Channels	Middle
Signal	PTT

B. SAR Measurement Results

Middle Band SAR (Channel 8):

Frequency (MHz)	467.5625
Relative permittivity (real part)	56.012000
Conductivity (S/m)	0.982538
Power Drift (%)	-1.680000
Ambient Temperature:	22.0°C
Liquid Temperature:	21.8°C
ConvF:	7.77
Crest factor:	1:1

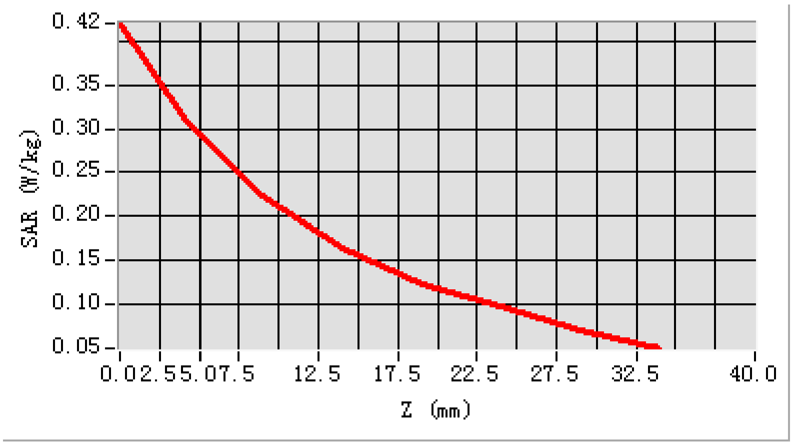
SURFACE SAR	**VOLUME SAR**
	

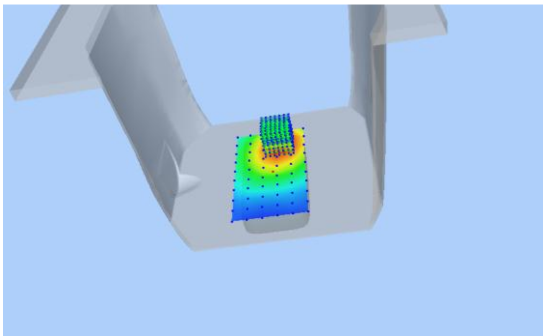
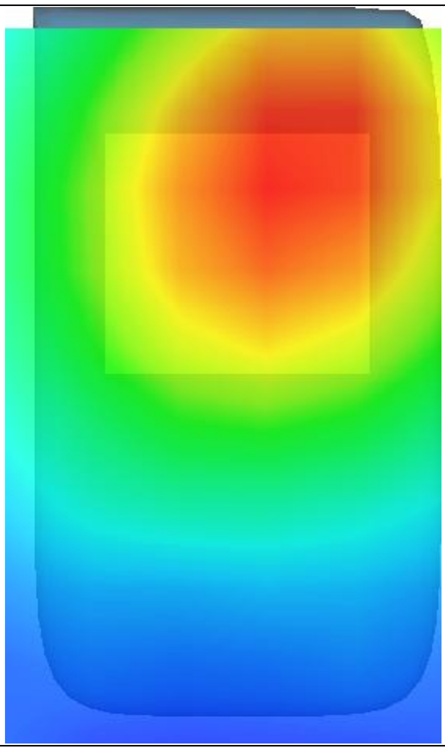
Maximum location: X=8.00, Y=36.00

SAR Peak: 0.59W/kg

SAR 10g (W/Kg)	0.153717
SAR 1g (W/Kg)	0.256659

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.4201	0.3135	0.2236	0.1631	0.1234	0.0977	0.0697



3D screen shot	Hot spot position
	

Annex E SATIMO Calibration Certificate

COMOSAR E-Field Probe Calibration Report

Ref : ACR.189.1.16.SATU.A

SHENZHEN MORLAB COMMUNICATIONS TECHNOLOGY CO., LTD

FL3, BUILDING A, FEIYANG SCIENCE PARK, NO.8 LONGCHANG ROAD,

BLOCK 67, BAOAN DISTRICT, SHENZHEN, GUANGDONG PROVINCE, P.R. CHINA

MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: SN 37/08 EP80

Calibrated at MVG US

2105 Barrett Park Dr. - Kennesaw, GA 30144

Calibration CERT #2246-02

Calibration Date: 07/05/2017

Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed in MVG USA using the CALISAR / CALIBAIR test bench, for use with a COMOSAR system only. All calibration results are traceable to national metrology institutions.

	Name	*Function*	*Date*	*Signature*
Prepared by :	Jérôme LUC	Product Manager	7/7/2017	
Checked by :	Jérôme LUC	Product Manager	7/7/2017	
Approved by :	Kim RUTKOWSKI	Quality Manager	7/7/2017	Kim Rutkowski

	Customer Name
Distribution :	Shenzhen Morlab Communications Technology Co., Ltd

Issue	*Date*	*Modifications*
A	7/7/2017	Initial release

TABLE OF CONTENTS

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE5
Serial Number	SN 37/08 EP80
Product Condition (new / used)	Used
Frequency Range of Probe	0.7 GHz-3GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=1.445 MΩ Dipole 2: R2=1.467 MΩ Dipole 3: R3=1.477 MΩ

A yearly calibration interval is recommended.

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards.

Figure 1 – *MVG COMOSAR Dosimetric E field Dipole*

Probe Length	330 mm
Length of Individual Dipoles	4.5 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	5 mm
Distance between dipoles / probe extremity	2.7 mm

3 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

3.1 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.

3.2 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.

3.3 LOWER DETECTION LIMIT

The lower detection limit was assessed using the same measurement set up as used for the linearity measurement. The required lower detection limit is 10 mW/kg.

3.4 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 - 360 degrees in 15 degree 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°–360°).

3.5 BOUNDARY EFFECT

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.

4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty associated with an E-field probe calibration using the waveguide technique. All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

Uncertainty analysis of the probe calibration in waveguide					
ERROR SOURCES	**Uncertainty value (%)**	**Probability Distribution**	**Divisor**	**ci**	**Standard Uncertainty (%)**
Incident or forward power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Reflected power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Liquid conductivity	5.00%	Rectangular	$\sqrt{3}$	1	2.887%
Liquid permittivity	4.00%	Rectangular	$\sqrt{3}$	1	2.309%
Field homogeneity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Field probe positioning	5.00%	Rectangular	$\sqrt{3}$	1	2.887%

Field probe linearity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Combined standard uncertainty					5.831%
Expanded uncertainty 95 % confidence level k = 2					12.0%

5 CALIBRATION MEASUREMENT RESULTS

Calibration Parameters	
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

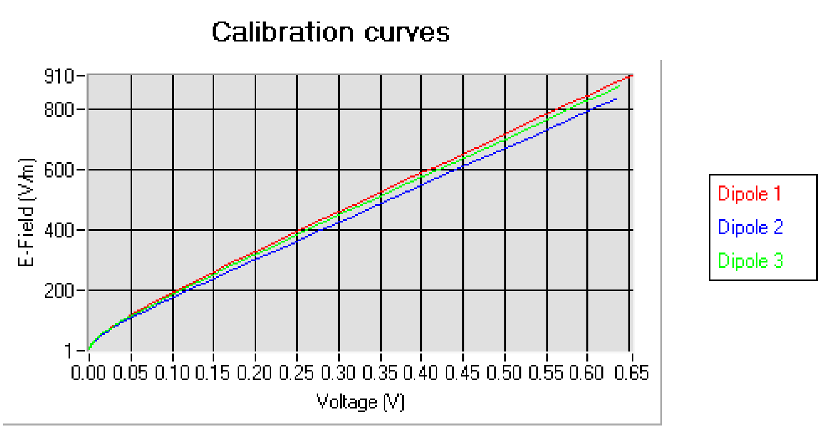
5.1 SENSITIVITY IN AIR

Normx dipole 1 ($\mu V/(V/m)^2$)	Normy dipole 2 ($\mu V/(V/m)^2$)	Normz dipole 3 ($\mu V/(V/m)^2$)
5.13	5.62	5.15

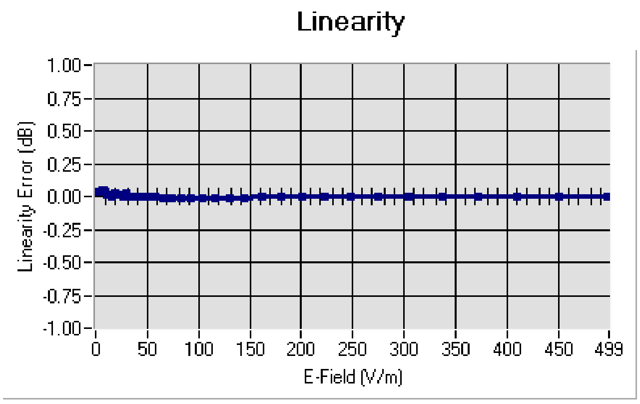
DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
129	109	123

Calibration curves ei=f(V) (i=1,2,3) allow to obtain H-field value using the formula:

$$E = \sqrt{E_1^2 + E_2^2 + E_3^2}$$



5.2 LINEARITY



Linearity:+/-1.11% (+/-0.05dB)

5.3 SENSITIVITY IN LIQUID

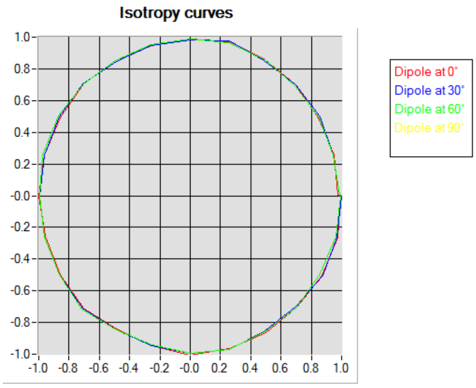
Liquid	Frequency (MHz +/- 100MHz)	Permittivity	Epsilon (S/m)	ConvF
HL450	450	42.17	0.86	7.55
BL450	450	57.65	0.95	7.77
HL750	750	40.03	0.93	6.44
BL750	750	56.83	1.00	6.68
HL900	900	42.08	1.01	6.13
BL900	900	55.25	1.08	6.37
HL1800	1800	41.68	1.46	5.21
BL1800	1800	53.86	1.46	5.38
HL1900	1900	38.45	1.45	5.61
BL1900	1900	53.32	1.56	5.71
HL2450	2450	37.50	1.80	4.82
BL2450	2450	53.22	1.89	4.96
HL2600	2600	39.80	1.99	4.74
BL2600	2600	52.52	2.23	4.93

LOWER DETECTION LIMIT: 8mW/kg

5.4 ISOTROPY

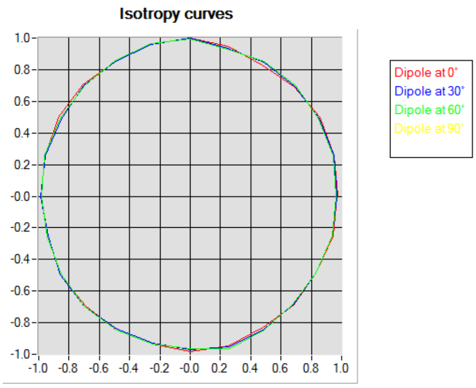
HL900 MHz

- Axial isotropy: 0.04 dB
- Hemispherical isotropy: 0.05 dB



HL1800 MHz

- Axial isotropy: 0.04 dB
- Hemispherical isotropy: 0.07 dB



6 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
Flat Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2016	02/2019
Reference Probe	MVG	EP 94 SN 37/08	10/2017	10/2018
Multimeter	Keithley 2000	1188656	12/2016	12/2019
Signal Generator	Agilent E4438C	MY49070581	12/2016	12/2019
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	12/2016	12/2019
Power Sensor	HP ECP-E26A	US37181460	12/2016	12/2019
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Waveguide	Mega Industries	069Y7-158-13-712	Validated. No cal required.	Validated. No cal required.
Waveguide Transition	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.
Waveguide Termination	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Control Company	150798832	10/2017	10/2019

SAR Reference Dipole Calibration Report

Ref : ACR.189.3.16.SATU.A

SHENZHEN MORLAB COMMUNICATIONS TECHNOLOGY CO., LTD
FL3, BUILDING A, FEIYANG SCIENCE PARK, NO.8 LONGCHANG ROAD,
BLOCK 67, BAOAN DISTRICT, SHENZHEN, GUANGDONG PROVINCE, P.R. CHINA
MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 450 MHZ
SERIAL NO.: SN 36/08 DIPB98

Calibrated at MVG US
2105 Barrett Park Dr. - Kennesaw, GA 30144

ACCREDITED
Calibration CERT #2246-02

Calibration Date: 07/05/2017

Summary:

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

	Name	*Function*	*Date*	*Signature*
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Distribution :	Shenzhen Morlab Communications Technology Co., Ltd

Issue	*Date*	*Modifications*
A	7/7/2017	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, FCC KDBs and CEI/IEC 62209 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 450 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID450
Serial Number	SN 36/08 DIPB98
Product Condition (new / used)	Used

A yearly calibration interval is recommended.

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

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

Figure 1 – *MVG COMOSAR Validation Dipole*

4 MEASUREMENT METHOD

The IEEE 1528, FCC KDBs and CEI/IEC 62209 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.

4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constucted as outlined in the fore mentioned standards.

4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimensions 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.

5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss
400-6000MHz	0.1 dB

5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
3 - 300	0.05 mm

5.3 VALIDATION MEASUREMENT

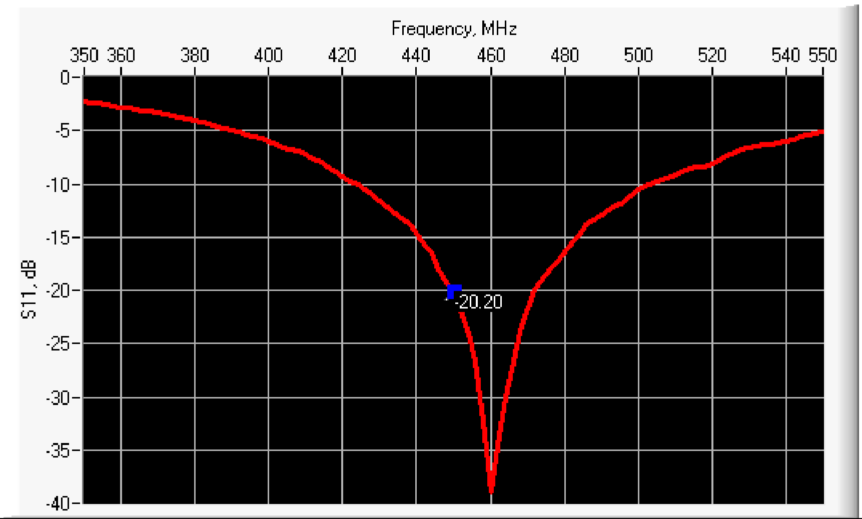
The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %

10 g	20.1 %

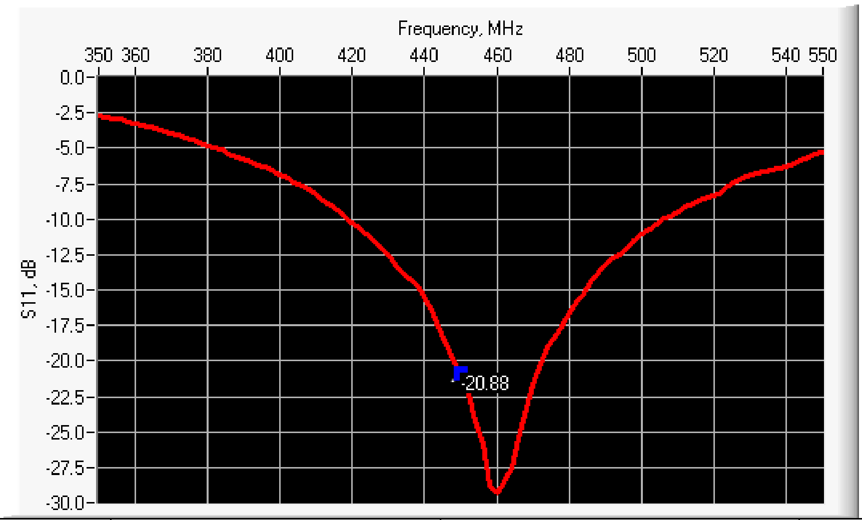
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
450	-20.20	-20	51.3 Ω + 9.8 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
450	-20.88	-20	49.8 Ω + 9.1 jΩ

6.3 MECHANICAL DIMENSIONS

Frequency MHz	**L** mm		**h** mm		**d** mm	
	required	**measured**	**required**	**measured**	**required**	**measured**
300	420.0 ±1 %.		250.0 ±1 %.		6.35 ±1 %.	

450	290.0 ±1 %.	PASS	166.7 ±1 %.	PASS	6.35 ±1 %.	PASS
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.		39.5 ±1 %.		3.6 ±1 %.	
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.		30.4 ±1 %.		3.6 ±1 %.	
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3500	37.0±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7±1 %.		26.4 ±1 %.		3.6 ±1 %.	

7 VALIDATION MEASUREMENT

The IEEE Std. 1528, FCC KDBs and CEI/IEC 62209 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.

7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	**Relative permittivity (ε_r')**		**Conductivity (σ) S/m**	
	required	**measured**	**required**	**measured**
300	45.3 ±5 %		0.87 ±5 %	
450	43.5 ±5 %	PASS	0.87 ±5 %	PASS
750	41.9 ±5 %		0.89 ±5 %	
835	41.5 ±5 %		0.90 ±5 %	
900	41.5 ±5 %		0.97 ±5 %	
1450	40.5 ±5 %		1.20 ±5 %	
1500	40.4 ±5 %		1.23 ±5 %	
1640	40.2 ±5 %		1.31 ±5 %	
1750	40.1 ±5 %		1.37 ±5 %	

1800	40.0 ±5 %		1.40 ±5 %	
1900	40.0 ±5 %		1.40 ±5 %	
1950	40.0 ±5 %		1.40 ±5 %	
2000	40.0 ±5 %		1.40 ±5 %	
2100	39.8 ±5 %		1.49 ±5 %	
2300	39.5 ±5 %		1.67 ±5 %	
2450	39.2 ±5 %		1.80 ±5 %	
2600	39.0 ±5 %		1.96 ±5 %	
3000	38.5 ±5 %		2.40 ±5 %	
3500	37.9 ±5 %		2.91 ±5 %	

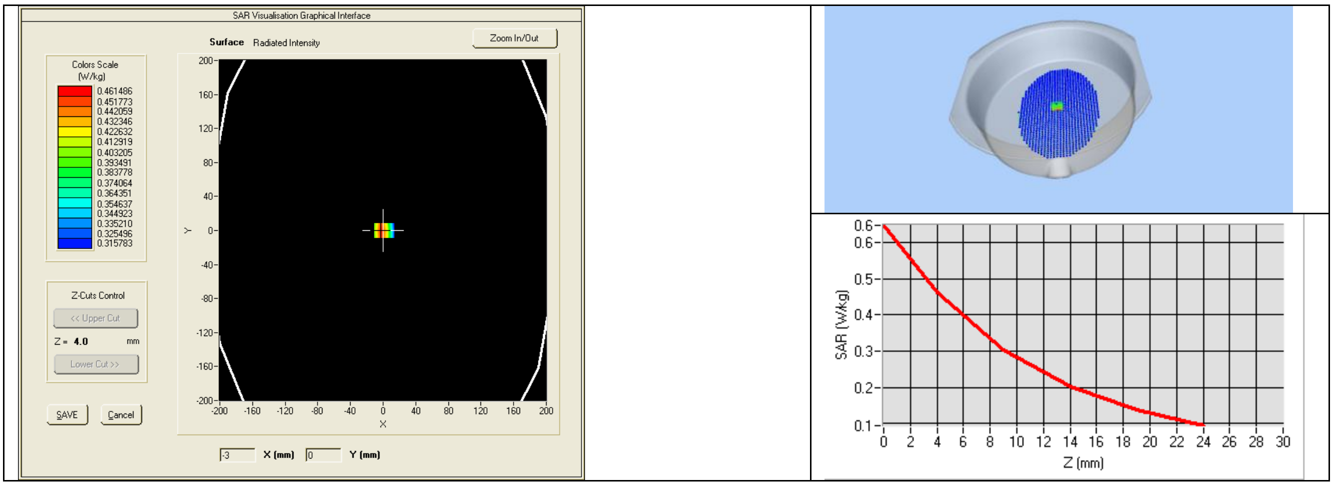
7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

The IEEE Std. 1528 and CEI/IEC 62209 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 V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Head Liquid Values: eps' : 42.2 sigma : 0.86
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	450 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	**1 g SAR (W/kg/W)**		**10 g SAR (W/kg/W)**	
	required	**measured**	**required**	**measured**
300	2.85		1.94	
450	4.58	4.71 (0.47)	3.06	2.99 (0.30)
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	

1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	



7.3 BODY LIQUID MEASUREMENT

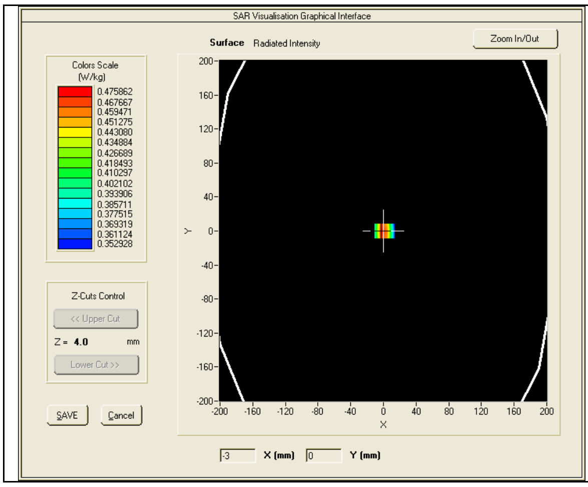
Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	**measured**	**required**	**measured**
150	61.9 ±5 %		0.80 ±5 %	
300	58.2 ±5 %		0.92 ±5 %	
450	56.7 ±5 %	PASS	0.94 ±5 %	PASS
750	55.5 ±5 %		0.96 ±5 %	
835	55.2 ±5 %		0.97 ±5 %	
900	55.0 ±5 %		1.05 ±5 %	
915	55.0 ±5 %		1.06 ±5 %	
1450	54.0 ±5 %		1.30 ±5 %	
1610	53.8 ±5 %		1.40 ±5 %	
1800	53.3 ±5 %		1.52 ±5 %	
1900	53.3 ±5 %		1.52 ±5 %	
2000	53.3 ±5 %		1.52 ±5 %	
2100	53.2 ±5 %		1.62 ±5 %	
2450	52.7 ±5 %		1.95 ±5 %	

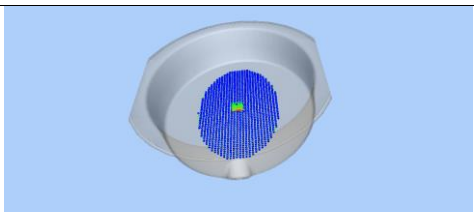
2600	52.5 ±5 %		2.16 ±5 %	
3000	52.0 ±5 %		2.73 ±5 %	
3500	51.3 ±5 %		3.31 ±5 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
5800	48.2 ±10 %		6.00 ±10 %	

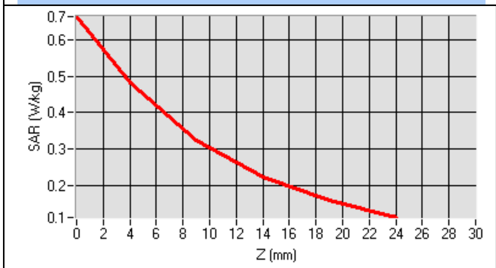
7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Body Liquid Values: eps' : 57.6 sigma : 0.95
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	450 MHz
Input power	20 dBm
Liquid Temperature	21 °C
Lab Temperature	21 °C
Lab Humidity	45 %

Frequency MHz	**1 g SAR (W/kg/W)**	**10 g SAR (W/kg/W)**
	measured	**measured**
450	4.80 (0.48)	3.14 (0.31)







8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2016	02/2019
Calipers	Carrera	CALIPER-01	12/2016	12/2019
Reference Probe	MVG	EPG122 SN 18/11	10/2017	10/2018
Multimeter	Keithley 2000	1188656	12/2016	12/2019
Signal Generator	Agilent E4438C	MY49070581	12/2016	12/2019
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	12/2016	12/2019
Power Sensor	HP ECP-E26A	US37181460	12/2016	12/2019
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Temperature and Humidity Sensor	Control Company	150798832	10/2017	10/2019