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SAR Test Report

Report No.:LCSA12223088E

Issued for

Buddi Limited

Talbot House 17 Church Street Rickmansworth, WD3 1DE
United Kingdom

Product Name:	Clip V3
Brand Name:	Buddi Ltd
Model Name:	3530003
Series Model(s):	Click
FCC ID:	ZDL353C
Test Standards:	ANSI/IEEE Std. C95.1-2019 FCC 47 CFR Part 2 (2.1093) IEC/IEEE 62209-1528
Max. SAR (10g)	Limb : 0.163W/kg
Max. SAR (1g)	Body : 0.255W/kg

Test Report Certification

Applicant's name .... :	Buddi Limited
Address .... :	Talbot House 17 Church Street Rickmansworth, WD3 1DE United Kingdom
Manufacturer's Name .... :	Buddi Limited
Address .... :	Talbot House 17 Church Street Rickmansworth, WD3 1DE United Kingdom

Product description

Product name .... :	Clip V3
Brand name .... :	Buddi Ltd
Model name .... :	3530003
Series Model.......................... :	Click
Standards .... :	ANSI/IEEE Std. C95.1-2019 FCC 47 CFR Part 2 (2.1093) IEC/IEEE 62209-1528

Date of Test .... :	
Date (s) of performance of tests............ :	14 Dec. 2023 ~ 18 Dec. 2023
Date of Issue... :	04 Jan. 2023
Test Result... :	**Pass**

Compiled by:	**Supervised by:**	**Approved by:**
Jay Zhan / File administrators	Cary Luo / Technique principal	Gavin Liang/ Manager

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Revision History

Rev.	Issue Date	Report No.	Effect Page	Contents
00	04 Jan. 2023	LCSA12223088E	ALL	Initial Issue

1. General Information

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head and Limb tissues exposed to radio frequency (RF) radiation from wireless portable devices for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC).

1.1 EUT Description

Product Name	Clip V3
Brand Name	Buddi Ltd
Model Name	3530003
Series Model	Click
Model Difference	Only the model name difference.
Battery	Rated Voltage: 3.7V Charge Limit Voltage: 4.2V Capacity: 750mAh
Device Category	Portable
Product stage	Production unit
RF Exposure Environment	General Population / Uncontrolled
Hardware Version	V14.0
Software Version	1.41.2
Frequency Range	GSM 850: 824 MHz ~ 849 MHz PCS1900: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band V: 824 MHz ~ 849 MHz WLAN802.11b/g/n20: 2412 to 2472MHz ISM: 914.5 MHz, 917.5MHz, 921.0MHz

	Band	Mode	Limb 10g (W/kg)	Body 1g (W/kg)
Max. Reported SAR:	PCB	GSM 850	0.006	0.010
	PCB	GSM 1900	0.006	0.012
	PCB	WCDMA Band II	0.004	0.009
	PCB	WCDMA Band V	0.003	0.005
	DSS	2.4 WLAN	0.163	0.255
	DXX	ISM [Note]	0.221	0.221
Sum SAR			0.227	0.267
Limt			4.0 W/kg	2.0 W/kg
FCC Equipment Class	PCS Licensed Transmitter (PCB) Part 15 Spread Spectrum Transmitter (DSS) Part 15 Low Power Communication Device Transmitter1(DXX)			
Operating Mode:	GSM: GPRS/EGPRS Class 12 WCDMA: RMC, HSDPA, HSUPA Release 6 WLAN: 802.11 a/b/g/n20 ISM:OOK			
Antenna Specification:	GSM/WCDMA: SMD Antenna ISM: SMD Antenna WLAN: SMD Antenna			
SIM Card	Built in SIM card.			
Hotspot Mode	Not Support			
DTM Mode	Not Support			
Note: 1. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power				

1.2 Test Environment

Ambient conditions in the SAR laboratory:

Items	Required
Temperature (℃)	18-25
Humidity (%RH)	30-70

1.3 Test Factory

Shenzhen LCS Compliance Testing Laboratory Ltd..

101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Yabianxueziwei, Shajing Street, Baoan District, Shenzhen, 518000, China FCC test Firm Registration No.: 625569

NVLAP Accreditation Code is 600167-0.
FCC Designation Number is CN5024.
CAB identifier is CN0071.
CNAS Registration Number is L4595.

ISED Designation Number is 9642A

2. Test Standards and Limits

No.	Identity	Document Title
1	47 CFR Part 2	Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
2	ANSI/IEEE Std. C95.1-2019	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
3	IEC/IEEE 62209-1528	Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and Limb -mounted wireless communication devices - Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)
4	FCC KDB 447498 D01 v06	Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies
5	FCC KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
6	FCC KDB 865664 D02 v01r02	RF Exposure Reporting
7	FCC KDB 648474 D04 v01r03	SAR Evaluation Considerations for Wireless Handsets

(A). Limits for Occupational/Controlled Exposure (W/kg)

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

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

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

NOTE: Whole-Limb SAR is averaged over the entire Limb , partial-Limb SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

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

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

NOTE

GENERAL POPULATION/UNCONTROLLED EXPOSURE

PARTIAL LIMB LIMIT

4.0 W/kg

PARTIAL BODY LIMIT

2.0 W/kg

3. SAR Measurement System

3.1 SAR Measurement Set-up

The OPENSAR system for performing compliance tests consist of the following items:

A standard high precision 6-axis robot (KUKA) with controller and software.

KUKA Control Panel (KCP)

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with a Video Positioning System(VPS).

The stress sensor is composed with mechanical and electronic when the electronic part detects a change on the electro-mechanical switch,It sends an “Emergency signal” to the robot controller that to stop robot’s moves

A computer operating Windows XP.

OPENSAR software

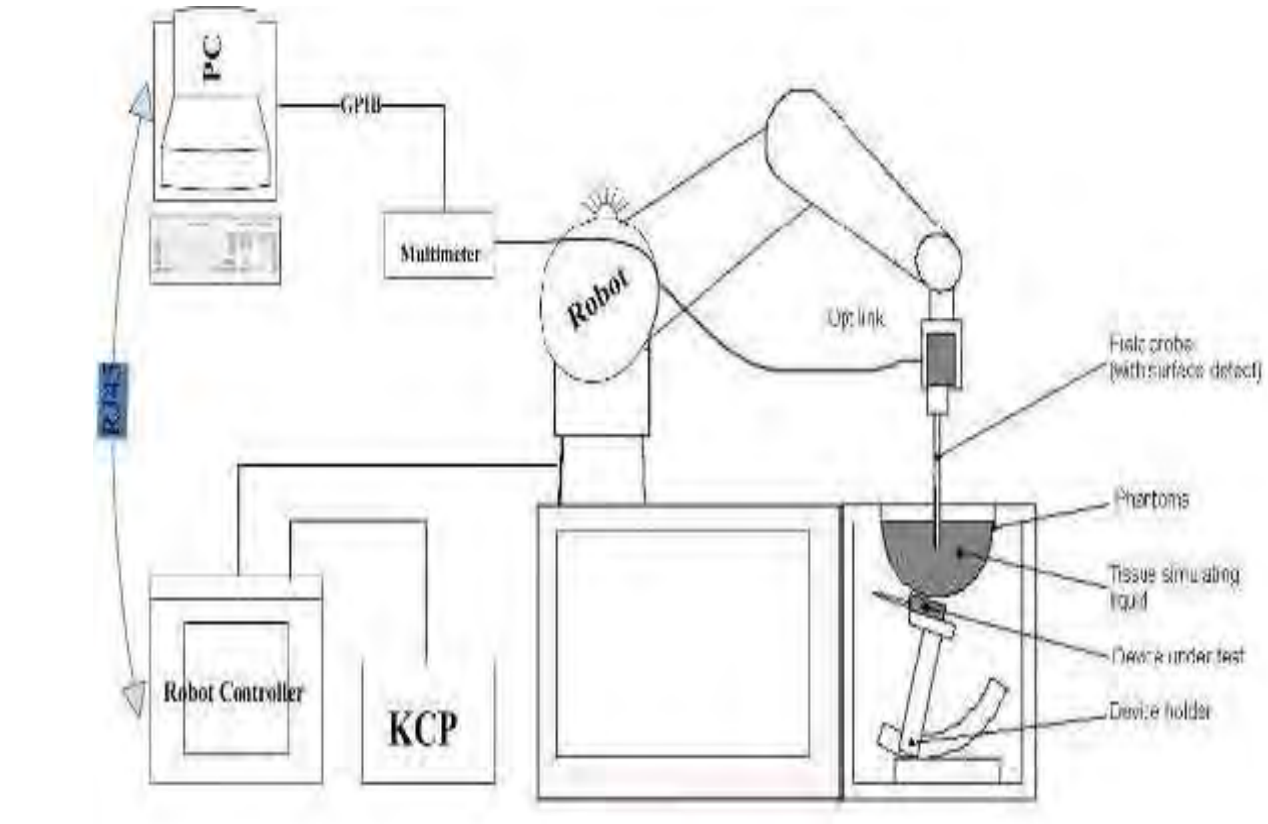
Remote control with teaches pendant and additional circuitry for robot safety such as warning lamps, etc.

The SAM phantom enabling testing left-hand right-hand and Limb usage.

The Position device for handheld EUT

Tissue simulating liquid mixed according to the given recipes .

System validation dipoles to validate the proper functioning of the system.



3.2OPENSAR E-field Probe System

The SAR measurements were conducted with the dosimetric probe EPGO376(manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

Probe Specification

ConstructionSymmetrical design with triangular core
Interleaved sensors
Built-in shielding against static charges
PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

CalibrationISO/IEC 17025 calibration service available.

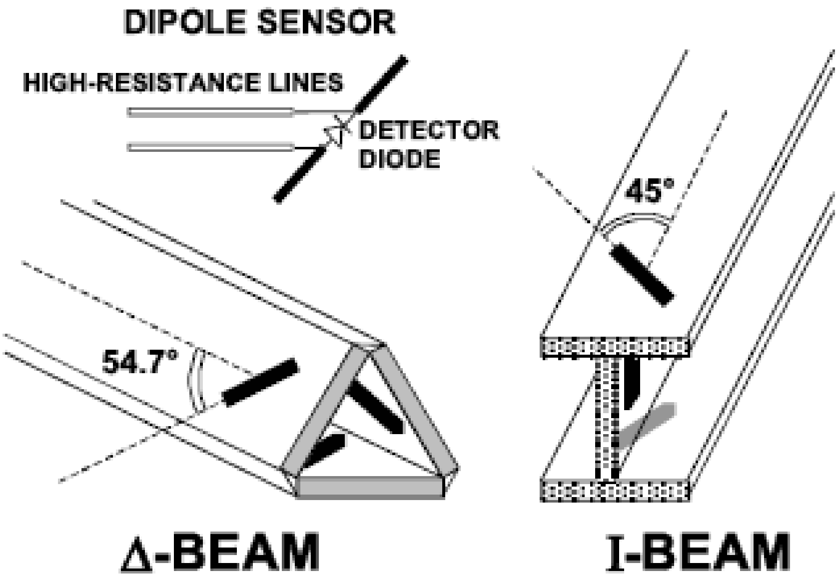
Frequency	450 MHz to 6 GHz; Linearity:0.25dB(450 MHz to 6GHz)
Directivity	0.25 dB in HSL (rotation around probe axis) 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	0.01W/kg to > 100 W/kg; Linearity: 0.25 dB
Dimensions	Overall length: 330 mm (Tip: 16mm)

	Tip diameter: 5 mm (Limb : 8 mm) Distance from probe tip to sensor centers: 2.5 mm
Application	General dosimetry up to 6 GHz Dosimetry in strong gradient fields Compliance tests of Mobile Phones

Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

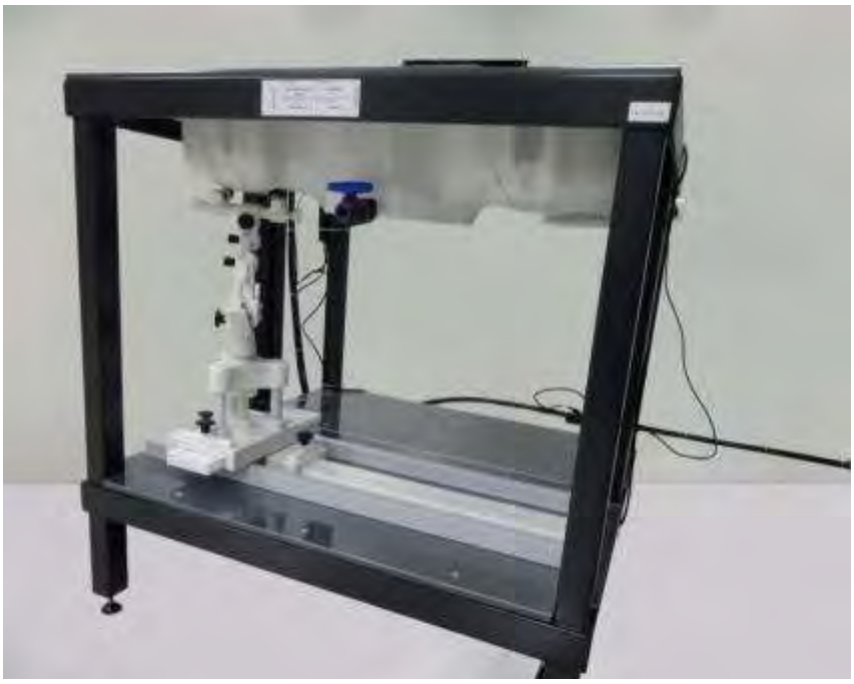
The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



3.3Phantoms

The SAM Phantom SAM117 is constructed of a fiberglass shell ntegrated in a wooden table. The shape of the shell is in compliance with the specification set in IEEE P1528 and CENELEC EN62209-1 , EN62209-2:2010.The phantom enables the dosimetric evaluation of left and right hand phone usage as well as Limb 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 allpredefined phantom positions and measurement grids by manually teaching three points in the robo

System checking was performed using the flat section, whilst Head SAR tests used the left and right head profile sections. Limb SAR testing also used the flat section between the head profiles.



SAM Twin Phantom

3.4Device Holder

In combination with the Generic Twin PhantomSAM117, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatedly positioned according to the FCC and CENELEC specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).

Device holder supplied by SATIMO

3.5Scanning Procedure

The procedure for assessing the peak spatial-average SAR value consists of the following steps

Power Reference Measurement
The reference and drift jobs are useful jobs for monitoring the power drift of the device under test

in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	½·δ·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.	

Zoom Scan
Zoom Scans are used to estimate the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The default Zoom Scan is done by 7x7x7 points within a cube whose base is centered around the maxima found in the preceding area scan.

			≤ 3 GHz	> 3 GHz
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·$\Delta z_{Zoom}(n-1)$ 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 *reported* 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.

Power Drift measurement

The drift job measures the field at the same location as the most recent reference job within the same procedure, and with the same settings. The drift measurement gives the field difference in dB from the reading conducted within the last reference measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test within a batch process. In the properties of the Drift job, the user can specify a limit for the drift and have OPENSAR software stop the measurements if this limit is exceeded.

3.6Data Storage and Evaluation

Data Storage

The OPENSAR software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files . The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

Data Evaluation

The OPENSAR software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	- Sensitivity	Normi, ai0, ai1, ai2
	- Conversion factor	ConvFi
	- Diode compression point	Dcpi
Device parameters:	- Frequency	f
	- Crest factor	cf
Media parameters:	- Conductivity	σ
	- Density	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the OPENSAR components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

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

With Vi = compensated signal of channel i (i = x, y, z)

Ui = input signal of channel i (i = x, y, z)
cf = crest factor of exciting field
dcpi = diode compression point

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

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

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

With Vi = compensated signal of channel i (i = x, y, z)
Normi = sensor sensitivity of channel i (i = x, y, z)
[mV/(V/m)2] for E-field Probes
ConvF = sensitivity enhancement in solution
aij = sensor sensitivity factors for H-field probes
f = carrier frequency [GHz]
Ei = electric field strength of channel i in V/m
Hi = magnetic field strength of channel i in A/m

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

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

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

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

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

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

4. Tissue Simulating Liquids

4.1 Simulating Liquids Parameter Check

The liquid is consisted of water,salt,Glycol,Sugar,Preventol and Cellulose.The liquid has previously been proven to be suited for worst-case.It's satisfying the latest tissue dielectric parameters requirements proposed by the KDB865664.

The composition of the tissue simulating liquid

Ingredient	750MHz		835MHz		1800 MHz		1900 MHz		2450MHz		2600MHz		5000MHz	
(% Weight)	Head	Limb	Head	Limb	Head	Limb	Head	Limb	Head	Limb	Head	Limb	Head	Limb
Water	39.28	51.3	41.45	52.5	54.5	40.2	54.9	40.4	62.7	73.2	60.3	71.4	65.5	78.6
Preventol	0.10	0.10	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HEC	1.00	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DGBE	0.00	0.00	0.00	0.00	45.33	59.31	44.92	59.10	36.80	26.70	39.10	28.40	0.00	0.00
Triton X-100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17.2	10.7

Target Frequency (MHz)	Head	
	ε_r	σ(S/m)
450	43.5	0.87
750	41.9	0.89
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1640	40.2	1.31
1800	40.0	1.40
1900	40.0	1.40
2000	40.0	1.40
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40
5200	36.0	4.66
5800	35.3	5.27

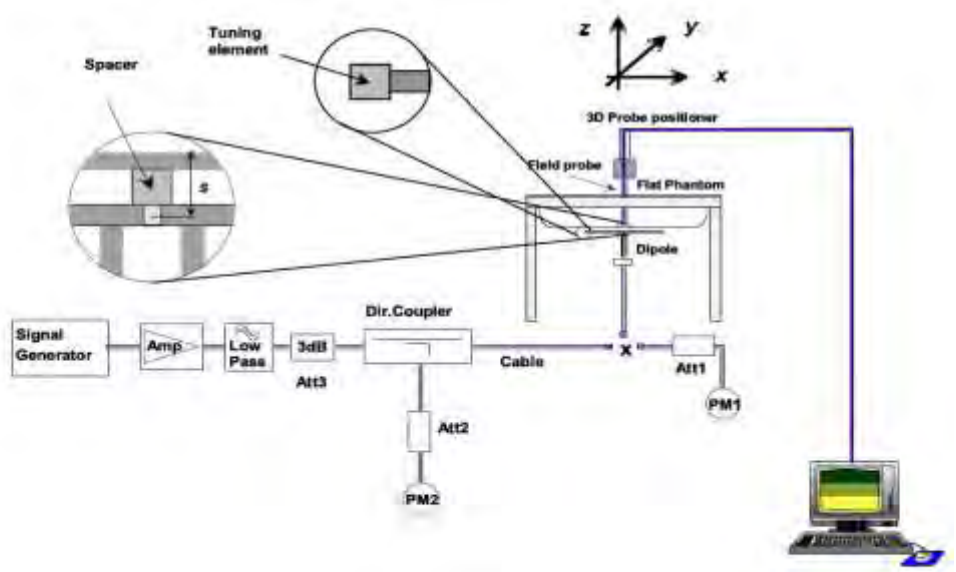
LIQUID MEASUREMENT RESULTS

Date	Ambient		Simulating Liquid		Parameters	Target	Measured	Deviation %	Limited %
	Temp. [°C]	Humidity %	Frequency (MHz)	Temp. [°C]					
2023-12-14	23.0	43	824.2	22.7	Permittivity	41.55	41.37	-0.44	±5
					Conductivity	0.90	0.91	1.25	±5
2023-12-14	23.0	43	826.4	22.7	Permittivity	41.54	41.40	-0.34	±5
					Conductivity	0.90	0.89	-1.00	±5
2023-12-14	23.0	44	835	22.7	Permittivity	41.50	41.67	0.41	±5
					Conductivity	0.90	0.88	-2.22	±5
2023-12-14	23.0	44	836.6	22.7	Permittivity	41.49	41.11	-0.92	±5
					Conductivity	0.90	0.92	2.20	±5
2023-12-14	23.1	44	846.6	22.8	Permittivity	41.45	41.70	0.61	±5
					Conductivity	0.90	0.92	2.07	±5
2023-12-14	23.1	44	848.8	22.8	Permittivity	41.44	40.96	-1.15	±5
					Conductivity	0.90	0.90	-0.18	±5
2023-12-15	20.7	43	1900	20.4	Permittivity	40.00	40.63	1.58	±5
					Conductivity	1.40	1.41	0.71	±5
2023-12-15	20.7	43	1850.2	20.4	Permittivity	40.00	40.52	1.30	±5
					Conductivity	1.40	1.46	4.29	±5
2023-12-15	20.8	43	1852.4	20.5	Permittivity	40.00	40.51	1.28	±5
					Conductivity	1.40	1.37	-2.14	±5
2023-12-15	20.9	44	1880	20.6	Permittivity	40.00	41.39	3.48	±5
					Conductivity	1.40	1.38	-1.43	±5
2023-12-15	21.0	44	1900	20.7	Permittivity	40.00	40.84	2.10	±5
					Conductivity	1.40	1.42	1.43	±5
2023-12-15	21.1	44	1907.6	20.7	Permittivity	40.00	40.08	0.20	±5
					Conductivity	1.40	1.42	1.43	±5
2023-12-15	21.1	44	1909.8	20.9	Permittivity	40.00	40.99	2.48	±5
					Conductivity	1.40	1.36	-2.86	±5
2023-12-18	21.7	52	2412	21.4	Permittivity	39.27	40.04	1.97	±5
					Conductivity	1.77	1.79	1.35	±5
2023-12-18	21.8	52	2437	21.5	Permittivity	39.22	39.92	1.78	±5
					Conductivity	1.79	1.78	-0.47	±5
2023-12-18	21.9	52	2450	21.6	Permittivity	39.20	40.02	2.09	±5
					Conductivity	1.80	1.79	-0.56	±5
2023-12-18	22.0	53	2462	21.7	Permittivity	39.18	40.34	2.96	±5
					Conductivity	1.81	1.83	1.07	±5

5. SAR System Validation

5.1 The purpose of the system check is to verify that the system operates within its specifications at the decice test frequency.The system check is simple check of repeatability to make sure that the system works correctly at the time of the compliance test;

System check results have to be equal or near the values determined during dipole calibration with the relevant liquids and test system (±10 %).



The output power on dipole port must be calibrated to 20 dBm (100mW) before dipole is connected.

Photo of Dipole Setup

Justification for Extended SAR Dipole Calibrations

Referring to KDB 865664D01V01r04, if dipoles are verified in return loss (<-20dB, within 20% of prior calibration), and in impedance (within 5 ohm of prior calibration), the annual calibration is not necessary and the calibration interval can be extended.While calibration intervals not exceed 3 years.

SID835 SN 07/14 DIP 0G835-303 Extend Dipole Calibrations

Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (ohm)	Delta (ohm)
2021-09-29	-24.49		54.9		2.8	
2022-09-29	-24.17	-1.31	54.5	-0.4	2.6	-0.2
2023-09-29	-24.20	-1.18	54.2	-0.7	2.5	-0.3

SID1900 SN 38/18 DIP 1G900-466 Extend Dipole Calibrations

Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (ohm)	Delta (ohm)
2021-09-22	-26.43		50.5		4.7	
2022-09-22	-26.33	-0.38	50.2	-0.3	4.5	-0.2
2023-09-22	-26.40	-0.11	50.1	-0.4	4.6	-0.1

SID2450 SN 07/14 DIP 2G450-306 Extend Dipole Calibrations

Date of Measurement	Return-Loss (dB)	Delta (%)	Real Impedance (ohm)	Delta (ohm)	Imaginary Impedance (ohm)	Delta (ohm)
2021-09-29	-25.59		44.7		-1.1	
2022-09-29	-25.68	0.35	44.8	0.1	-1.0	0.1
2023-09-29	-25.70	0.43	44.5	-0.2	-1.1	0.0

5.2 Validation Result

Comparing to the original SAR value provided by MVG, the validation data should be within its specification of 10 %.

Date	Freq.	Power	Tested Value	Normalized SAR	Target SAR	Tolerance	Limit
	(MHz)	(mW)	(W/Kg)	(W/kg)	1g(W/kg)	(%)	(%)
2023-12-14	835	100	0.597	5.97	6.15	-2.93	10
2023-12-15	1900	100	1.999	19.99	20.20	-1.04	10
2023-12-18	2450	100	2.425	24.25	24.11	0.58	10

Note:

1. The tolerance limit of System validation ±10%.
2. The dipole input power (forward power) was 100 mW.
3. The results are normalized to 1 W input power.

6. SAR Evaluation Procedures

The procedure for assessing the average SAR value consists of the following steps:
The following steps are used for each test position

- 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
- Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
- 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.
- 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.

➢ Area Scan& Zoom Scan

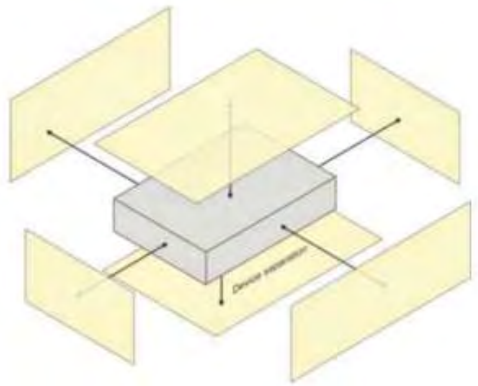
First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01 quoted below. When the 1-g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.

7. EUT Test Position

This EUT was tested Front side, Back Side.

7.1 Limb -worn Position Conditions

Limb -worn Position Conditions:
Limb -worn accessory exposure is typically related to voice mode operations when handsets are carried in Limb -worn accessories. The Limb -worn accessory procedures in KDB Publication 447498 D01 should be used to test for Limb -worn accessory SAR compliance, without a headset connected to it. When the same wireless transmission configuration is used for testing Limb -worn accessory and hotspot mode SAR, respectively, in voice and data mode, SAR results for the most conservative *test separation distance* configuration may be used to support both SAR conditions. When the *reported* SAR for a Limb -worn accessory, measured without a headset connected to the handset, is > 1.2 W/kg, the highest *reported* SAR configuration for that wireless mode and frequency band should be repeated for the Limb -worn accessory with a headset attached to the handset.



7.2 SAR Test Exclusions Applied

Standalone SAR test exclusion applies 447498 D04 Interim General Radio Frequency Exposure Guidelines v01. The available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold Pth (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). Pth is given by:

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

Where

$$x = -\log_{10}\left(\frac{60}{ERP_{20\ cm}\sqrt{f}}\right) \text{ and } f \text{ is in GHz;}$$

and

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

d = the separation distance (cm);

Function	Fre. (GHz)	Separation distance (cm)	Max Turn up power (dBm)	Max Turn up power (mW)	Pth (mW)
ISM	0.9175	0.5	0.5	1.12	8.10

Note: The Maximum power is less than the Pth, complies with the exemption requirements.

8. Uncertainty

8.1 Measurement Uncertainty

Not required as SAR measurement uncertainty analysis is required in SAR reports only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR accoridng to KDB865664D01.

9. Conducted Power Measurement

9.1 Test Result

Burst Average Power (dBm)						
Band	GSM 850			PCS 1900		
Channel	128	190	251	512	661	810
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880.0	1909.8
GPRS (GMSK,1-Slot)	31.71	32.01	32.15	29.26	29.09	28.82
GPRS (GMSK, 2-Slot)	31.53	31.81	31.99	29.16	28.94	28.72
GPRS (GMSK, 3-Slot)	31.32	31.42	31.61	28.88	28.74	28.49
GPRS (GMSK, 4-Slot)	29.89	30.08	30.21	27.80	27.69	27.52
EGPRS(8PSK, 1-Slot)	26.96	26.62	26.54	26.43	26.22	26.27
EGPRS(8PSK, 2-Slot)	26.25	26.69	26.31	26.18	26.25	26.21
EGPRS(8PSK, 3-Slot)	25.30	25.18	25.53	25.80	25.71	25.96
EGPRS(8PSK, 4-Slot)	24.10	23.88	23.66	24.67	24.56	24.19
GPRS (GMSK,1-Slot)	31.71	32.01	32.15	29.26	29.09	28.82

Remark: GPRS, CS4 coding scheme. MCS5 coding scheme.
Multi-Slot Class 8, Support Max 4 downlink, 1 uplink, 5 working link
Multi-Slot Class 10, Support Max 4 downlink, 2 uplink, 5 working link
Multi-Slot Class 12, Support Max 4 downlink, 4 uplink, 5 working link

Fram- Average Power(dBm)						
Band	GSM 850			PCS 1900		
Channel	128	190	251	512	661	810
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880.0	1909.8
GPRS (GMSK,1-Slot)	22.68	22.98	23.12	20.23	20.06	19.79
GPRS (GMSK, 2-Slot)	25.51	25.79	25.97	23.14	22.92	22.70
GPRS (GMSK, 3-Slot)	27.06	27.16	27.35	24.62	24.48	24.23
GPRS (GMSK, 4-Slot)	26.88	27.07	27.20	24.79	24.68	24.51
EGPRS(8PSK, 1-Slot)	17.93	17.59	17.51	17.40	17.19	17.24
EGPRS(8PSK, 2-Slot)	20.23	20.67	20.29	20.16	20.23	20.19
EGPRS(8PSK, 3-Slot)	21.04	20.92	21.27	21.54	21.45	21.70
EGPRS(8PSK, 4-Slot)	21.09	20.87	20.65	21.66	21.55	21.18

Remark :
1. SAR testing was performed on the maximum frame-averaged power mode.
2. The frame-averaged power is linearly proportion to the slot number configured and it is linearly scaled the maximum
Burst - averaged power based on time slots. The calculated method is shown as below:
Frame-averaged power = Burst averaged power (1 TX Slot) – 9.03 dB
Frame-averaged power = Burst averaged power (2 TX Slots) – 6.02 dB
Frame-averaged power = Burst averaged power (3 TX Slots) - 4.26 dB
Frame-averaged power = Burst averaged power (4 TX Slots) – 3.01 dB

WCDMA

Band	WCDMA Band 2			WCDMA Band 5		
Channel	9262	9400	9538	4132	4183	4233
Frequency (MHz)	1852.4	1880	1907.6	826.4	836.6	846.6
RMC 12.2Kbps	21.62	21.77	21.19	22.27	22.47	22.65
HSDPA Subtest-1	20.65	20.36	19.36	21.30	20.80	19.91
HSDPA Subtest-2	19.22	20.57	20.25	19.72	21.56	21.30
HSDPA Subtest-3	19.46	19.44	20.00	20.08	19.80	21.75
HSDPA Subtest-4	19.82	19.07	18.51	21.56	20.45	20.19
HSUPA Subtest-1	19.68	20.48	19.82	20.38	20.96	20.51
HSUPA Subtest-2	20.77	20.07	19.85	21.31	20.43	20.72
HSUPA Subtest-3	20.37	19.88	20.58	21.33	20.91	21.66
HSUPA Subtest-4	19.92	19.22	19.81	20.64	20.85	21.34
HSUPA Subtest-5	19.05	20.08	19.16	20.91	21.71	20.77

WIFI

2.4GWIFI				
Mode	Channel Number	Frequency (MHz)	Average Power (dBm)	Output Power (mW)
802.11b	1	2412	15.12	32.51
	7	2437	15.66	36.81
	11	2462	15.98	39.63
802.11g	1	2412	14.12	25.82
	7	2437	13.76	23.77
	11	2462	13.93	24.72
802.11 n-HT20	1	2412	13.93	24.72
	7	2437	13.82	24.10
	11	2462	13.86	24.32

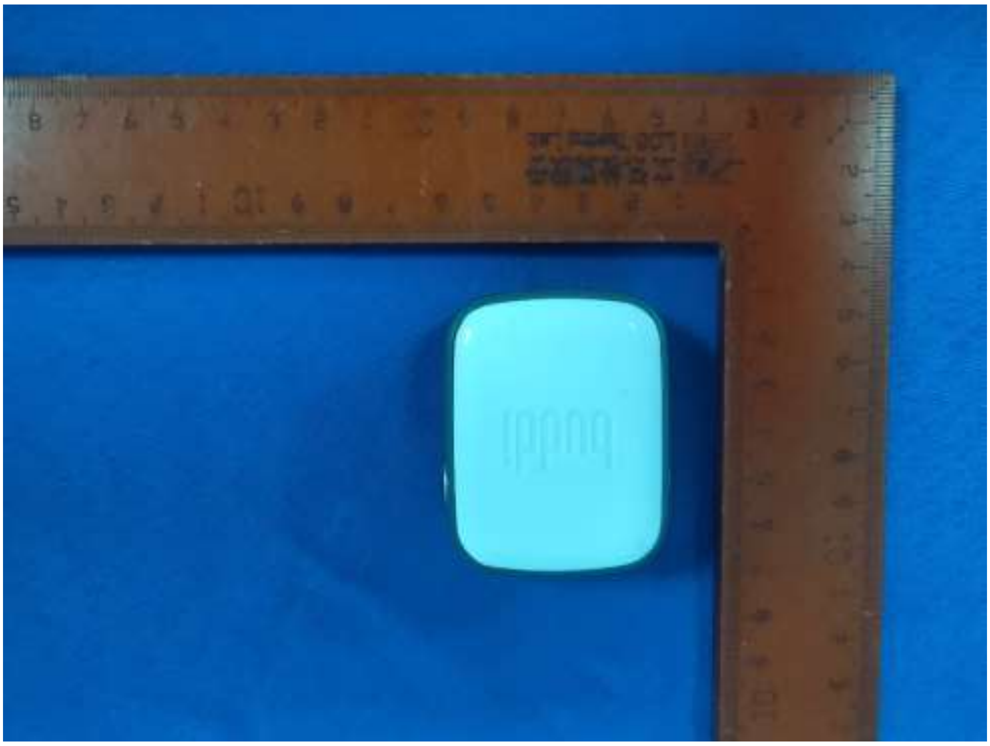
ISM

ISM			
Mode	Channel Number	Frequency (MHz)	Average Power (dBm)
ISM	High	921	-0.58
	Mid	917.5	-0.32
	Low	914.5	0.06

10. EUT and Test Setup Photo

10.1 EUT Photo

Front side

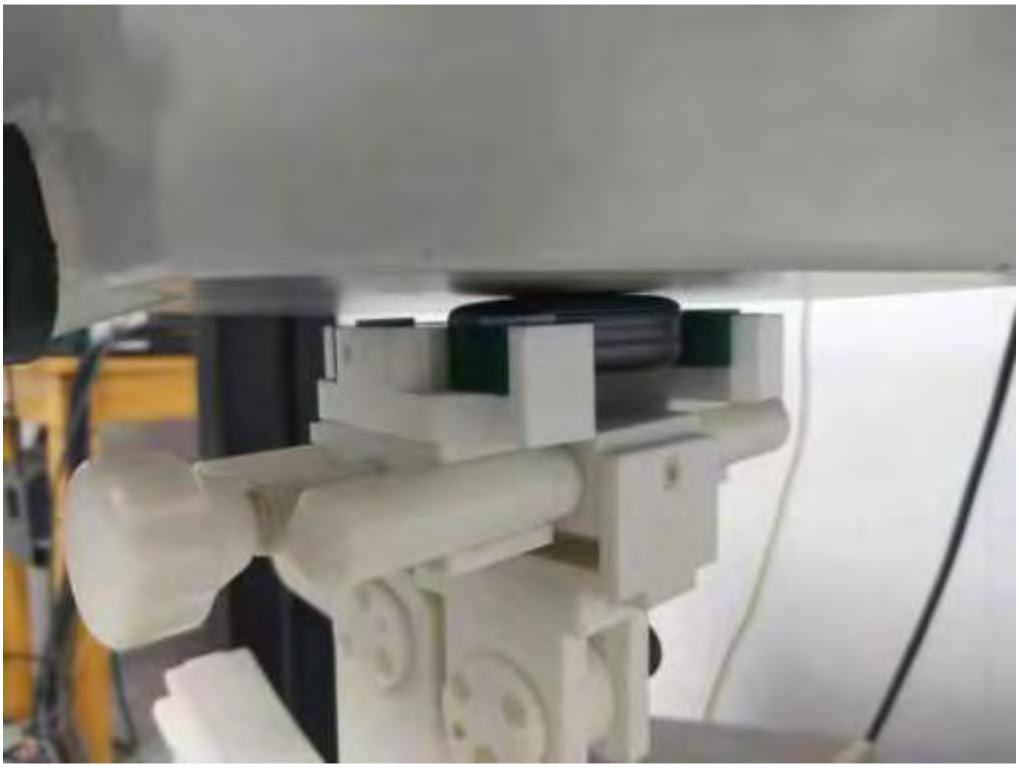


Back side

10.2 Setup Photo

Limb Front Side

Limb Back Side



11. SAR Result Summary

11.1 Limb-worn SAR

Band	Model	Test Position	Freq.	SAR (10g) (W/kg)	SAR (10g) with 0.22% duty cycle (W/kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas.No.
GSM850	GPRS Data-3 Slot	Front Side	824.2	2.008	0.0044	-0.90	32.00	31.32	0.005	/
		Front Side	836.6	2.122	0.0047	2.76	32.00	31.42	0.005	/
		Front Side	848.8	2.432	0.0054	-0.54	32.00	31.61	0.006	1
		Back Side	848.8	0.389	0.0009	1.06	32.00	31.61	0.001	/
GSM1900	GPRS Data-4 Slot	Front Side	1850.2	2.400	0.0053	-1.31	28.00	27.80	0.006	2
		Front Side	1880	1.967	0.0043	-0.46	28.00	27.69	0.005	/
		Front Side	1909.8	2.132	0.0047	2.84	28.00	27.52	0.005	/
		Back Side	1850.2	0.342	0.0008	-0.88	28.00	27.80	0.001	/
WCDMA Band II	RMC	Front Side	1852.4	1.555	0.0034	1.09	22.00	21.62	0.004	/
		Front Side	1880	1.817	0.0040	-2.85	22.00	21.77	0.004	3
		Front Side	1907.6	1.614	0.0036	2.20	22.00	21.19	0.004	/
		Back Side	1880	0.182	0.0004	-2.95	22.00	21.77	0.000	/
WCDMA Band V	RMC	Front Side	826.4	0.985	0.0022	-2.28	23.00	22.27	0.003	/
		Front Side	836.6	1.011	0.0022	2.95	23.00	22.47	0.003	/
		Front Side	846.6	1.276	0.0028	0.32	23.00	22.65	0.003	4
		Back Side	846.6	0.162	0.0004	0.32	23.00	22.65	0.000	/

Band	Model	Test Position	Freq.	SAR (10g) (W/kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas.No.
2.4GHz WLAN	802.11b	Front Side	2412	0.123	-1.61	16.00	15.12	0.151	/
		Front Side	2437	0.115	0.25	16.00	15.66	0.124	/
		Front Side	2462	0.162	1.22	16.00	15.98	0.163	5
		Back Side	2462	0.057	-2.42	16.00	15.98	0.057	/

Note:

1. The test separation of all above table is 0mm.
2. Per KDB 447498 D04, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
   a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
   b. Scaled SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
3. Per KDB 248227- When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to

DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg. (The highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power was **0.106** W/Kg for Limb)

4. When the user enables the personal Wireless router functions for the handsets, actual operations include simultaneous transmission of both the Wi-Fi transmitting frequency and thus cannot be evaluated for SAR under actual use conditions. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.
5. As for 2G/3G function:1 transmission a maximum of every 15 minutes, an uplink average of 2 se conds connected to the
GPRS/3G network for each transmission. Over a 1hour period the transmission is 8 seconds, so duty cycle is 0.22%.

11.3 Body SAR

Band	Model	Test Position	Freq.	SAR (1g) (W/kg)	SAR (1g) with 0.22% duty cycle (W/kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas.No.
GSM850	GPRS Data-3 Slot	Front Side	824.2	3.885	0.0085	-0.90	32.00	31.32	0.010	/
		Front Side	836.6	3.744	0.0082	2.76	32.00	31.42	0.009	/
		Front Side	848.8	4.246	0.0093	-0.54	32.00	31.61	0.010	6
		Back Side	848.8	0.655	0.0014	1.06	32.00	31.61	0.002	/
GSM1900	GPRS Data-4 Slot	Front Side	1850.2	5.406	0.0119	-1.31	28.00	27.80	0.012	7
		Front Side	1880	4.853	0.0107	-0.46	28.00	27.69	0.011	/
		Front Side	1909.8	4.668	0.0103	2.84	28.00	27.52	0.011	/
		Back Side	1850.2	1.223	0.0027	-0.88	28.00	27.80	0.003	/
WCDMA Band II	RMC	Front Side	1852.4	3.665	0.0081	1.09	22.00	21.62	0.009	/
		Front Side	1880	3.913	0.0086	-2.85	22.00	21.77	0.009	8
		Front Side	1907.6	3.557	0.0078	2.20	22.00	21.19	0.009	/
		Back Side	1880	0.458	0.0010	-2.95	22.00	21.77	0.001	/
WCDMA Band V	RMC	Front Side	826.4	1.783	0.0039	-2.28	23.00	22.27	0.005	/
		Front Side	836.6	1.855	0.0041	2.95	23.00	22.47	0.005	/
		Front Side	846.6	2.206	0.0049	0.32	23.00	22.65	0.005	9
		Back Side	846.6	0.353	0.0008	0.55	23.00	22.65	0.001	/

Band	Model	Test Position	Freq.	SAR (10g) (W/kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas.No.
2.4GHz WLAN	802.11b	Front Side	2412	0.194	-1.61	16.00	15.12	0.238	/
		Front Side	2437	0.221	0.25	16.00	15.66	0.239	/
		Front Side	2462	0.254	1.22	16.00	15.98	0.255	10
		Back Side	2462	0.140	-2.42	16.00	15.98	0.141	/

Note:

1. The test separation of all above table is 0mm.
2. Per KDB 447498 D04, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
   a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
   b. Scaled SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
3. Per KDB 248227- When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg. (The highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power was **0.166**W/Kg for Body)
4. When the user enables the personal Wireless router functions for the handsets, actual operations include simultaneous transmission of both the Wi-Fi transmitting frequency and thus cannot be evaluated for SAR under actual use conditions. The “Portable Hotspot” feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.
5. As for 2G/3G function:1 transmission a maximum of every 15 minutes, an uplink average of 2 se conds connected to the
   GPRS/3G network for each transmission. Over a 1hour period the transmission is 8 seconds, so duty cycle is 0.22%.

Simultaneous Multi-band Transmission Evaluation:

Application Simultaneous Transmission information:

Position	Simultaneous State
Limb&Body	1. GSM +2.4GHz WLAN
	2. WCDMA + 2.4GHz WLAN
	3. GSM +ISM
	4. WCDMA + ISM

NOTE:

1. ISM and WLAN can't simultaneous transmission at the same time.
2. For simultaneous transmission at head and body exposure position, 2 transmitters simultaneous transmission was the worst state.
3. If the test separation distance is <5mm, 5mm is used for excluded SAR calculation.
4. KDB 447498 Appendix E, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:
   SAR_{est} =1.6 · Pant / Pth [W/kg].
   P_{ant} is maximum time-averaged power or effective radiated power (ERP), whichever is greater, and P_{th} is defined in Formula KDB 447498 (B.2).

Estimated SAR		Antenna to user(cm)	Pant	Pth	Stand Alone SAR(1g) [W/kg]
ISM	Limb&Body	≤0.5	1.12	8.1	0.221

Limb

Simultaneous Mode	Position	Mode	Max. 10-g SAR (W/kg)	10-g Sum SAR (W/kg)
GSM + 2.4G WLAN	Limb	GSM	0.006	0.169
		2.4G WLAN	0.163	
WCDMA + 2.4G WLAN	Limb	WCDMA	0.004	0.167
		2.4G WLAN	0.163	
GSM +ISM	Limb	GSM	0.006	0.227
		ISM	0.221	
WCDMA + ISM	Limb	WCDMA	0.004	0.225
		ISM	0.221	

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

Body

Simultaneous Mode	Position	Mode	Max. 1-g SAR (W/kg)	1-g Sum SAR (W/kg)
GSM + 2.4G WLAN	Body	GSM	0.012	0.267
		2.4G WLAN	0.255	
WCDMA + 2.4G WLAN	Body	WCDMA	0.009	0.264
		2.4G WLAN	0.255	
GSM +ISM	Body	GSM	0.012	0.233
		ISM	0.221	
WCDMA + ISM	Body	WCDMA	0.009	0.230
		ISM	0.221	

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

12. Equipment List

Item	Equipment	Manufacturer	Model No.	Serial No.	Cal Date	Due Date
1	PC	Lenovo	G5005	MY42081102	N/A	N/A
2	SAR Measurement system	SATIMO	4014_01	SAR_4014_01	N/A	N/A
3	Signal Generator	Agilent	E4438C	MY49072627	2023-06-09	2024-06-08
4	S-parameter Network Analyzer	Agilent	8753ES	US38432944	2023-06-09	2024-06-08
5	Wideband Radio Communication Tester	R&S	CMW500	103818-1	2023-10-25	2024-10-24
6	E-Field PROBE	MVG	SSE2	SN 25/22 EPGO376	2023-06-22	2024-06-21
7	DIPOLE 835	SATIMO	SID 835	SN 07/14 DIP 0G835-303	2021-09-29	2024-09-28
8	DIPOLE 1900	SATIMO	SID 1900	SN 38/18 DIP 1G900-466	2021-09-22	2024-09-21
9	DIPOLE 2450	SATIMO	SID 2450	SN 07/14 DIP 2G450-306	2021-09-29	2024-09-28
10	COMOSAR OPENCoaxial Probe	SATIMO	OCPG 68	SN 40/14 OCPG68	2023-10-25	2024-10-24
11	Communication Antenna	SATIMO	ANTA57	SN 39/14 ANTA57	2023-10-25	2024-10-24
12	FEATURE PHONEPOSITIONING DEVICE	SATIMO	MSH98	SN 40/14 MSH98	N/A	N/A
13	DUMMY PROBE	SATIMO	DP60	SN 03/14 DP60	N/A	N/A
14	SAM PHANTOM	SATIMO	SAM117	SN 40/14 SAM117	N/A	N/A
15	Liquid measurement Kit	HP	85033D	3423A03482	N/A	N/A
16	Power meter	Agilent	E4419B	MY45104493	2023-10-25	2024-10-24
17	Power meter	Agilent	E4419B	MY45100308	2023-10-25	2024-10-24
18	Power sensor	Agilent	E9301H	MY41495616	2023-10-25	2024-10-24
19	Power sensor	Agilent	E9301H	MY41495234	2023-10-25	2024-10-24
20	Directional Coupler	MCLI/USA	4426-20	03746	2023-06-09	2024-06-08

Appendix A. System Validation Plots

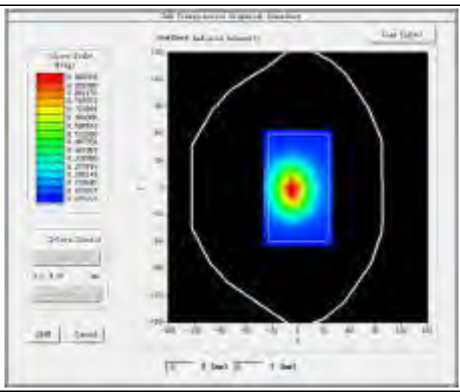
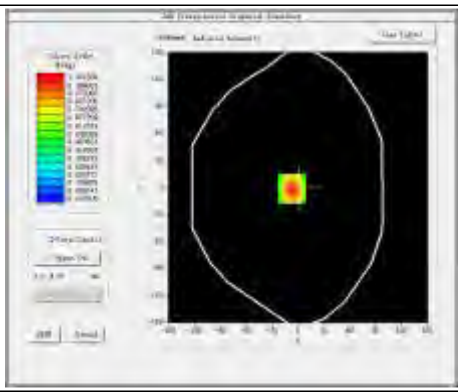
System Performance Check Data (835MHz)

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm, dy=8mm
Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm
Date of measurement: 2023-12-14

Experimental conditions

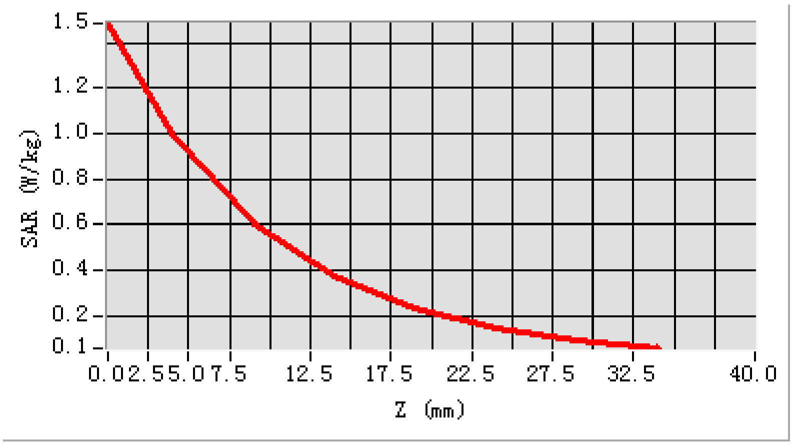
Phantom	Validation plane
Device Position	-
Band	835MHz
Channels	-
Signal	CW
Frequency (MHz)	835MHz
Relative permittivity	41.67
Conductivity (S/m)	0.88
Probe	SN 25/22 EPGO376
ConvF:	1.57
Crest factor:	1:1

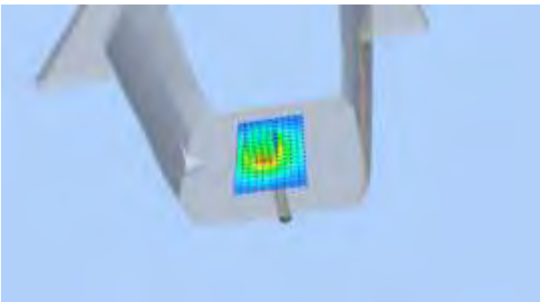
SURFACE SAR	VOLUME SAR
	

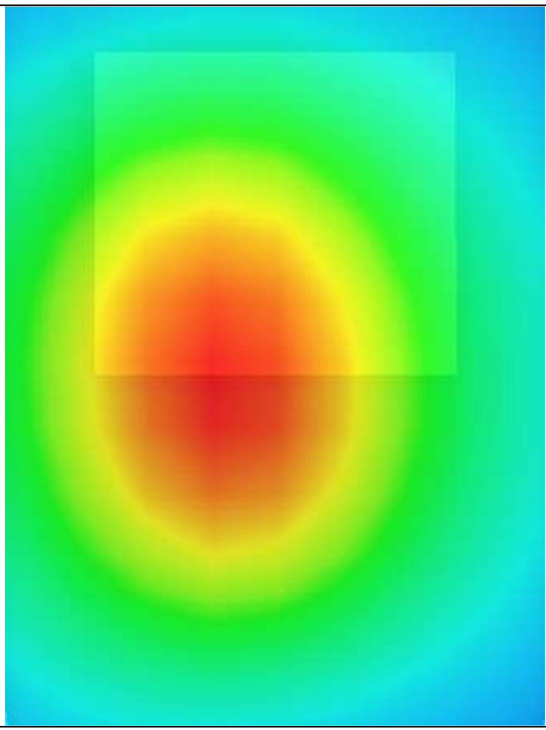
Maximum location: X=-6.00, Y=-2.00

SAR 10g (W/Kg)	0.596858
SAR 10g (W/Kg)	0.934079

Z Axis Scan


SAR (W/kg)
1.5
1.2
1.0
0.8
0.6
0.4
0.2
0.1
0.0 2.5 5.0 7.5 12.5 17.5 22.5 27.5 32.5 40.0
Z (mm)



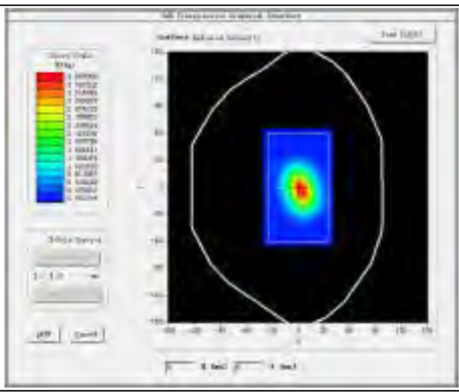
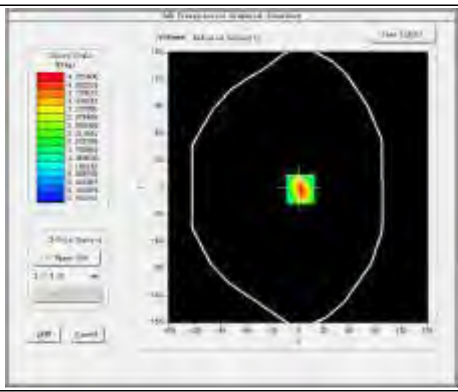


System Performance Check Data (1900MHz)

Type: Phone measurement (Complete)
Area scan resolution: dx=8mm, dy=8mm
Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm
Date of measurement: 2023-12-15

Experimental conditions.

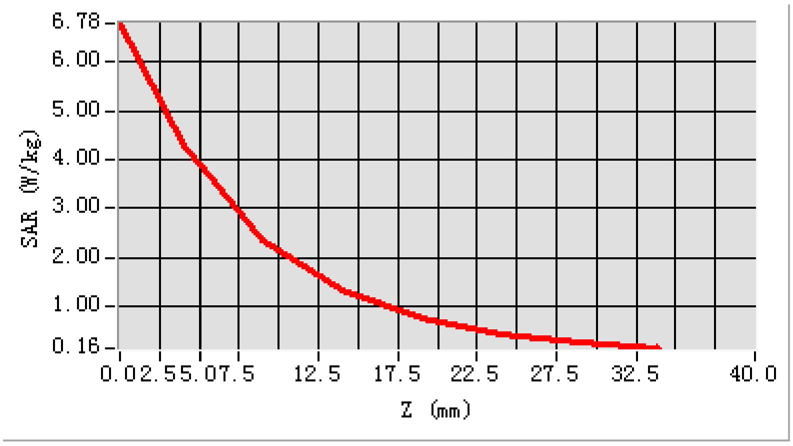
Phantom	Validation plane
Device Position	-
Band	1900MHz
Channels	-
Signal	CW
Frequency (MHz)	1900MHz
Relative permittivity	40.63
Conductivity (S/m)	1.41
Probe	SN 25/22 EPGO376
ConvF:	1.78
Crest factor:	1:1

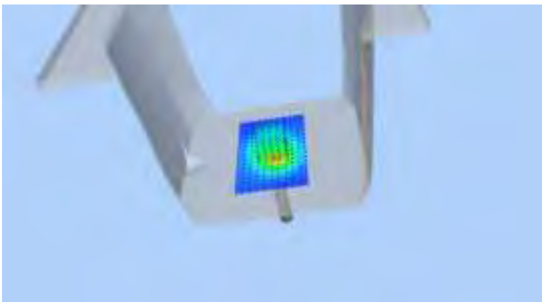
SURFACE SAR	VOLUME SAR
	

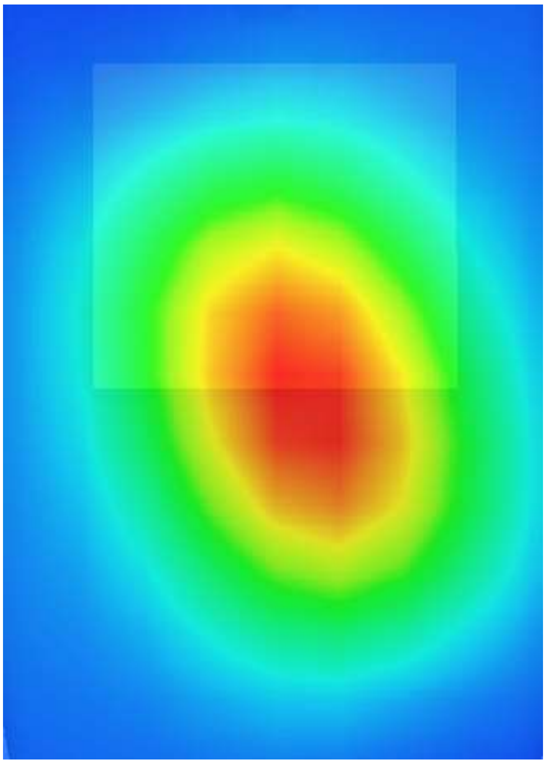
Maximum location: X=5.00, Y=-3.00

SAR 10g (W/Kg)	1.999094
SAR 10g (W/Kg)	4.079337

Z Axis Scan


6.78
6.00
5.00
4.00
3.00
2.00
1.00
0.16
SAR (W/kg)
0.0
2.5
5.0
7.5
12.5
17.5
22.5
27.5
32.5
40.0
Z (mm)



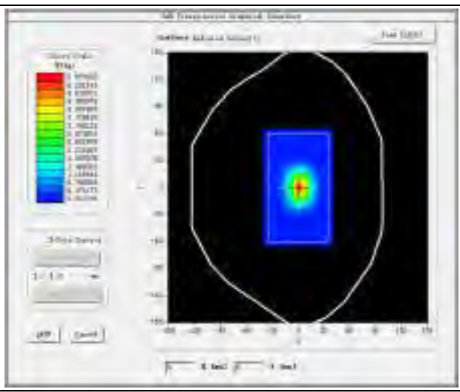
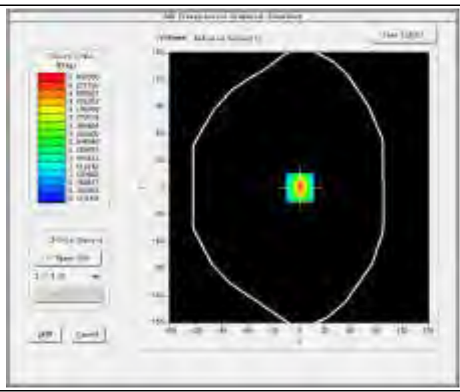


System Performance Check Data (2450MHz)

Type: Phone measurement (Complete)
Area scan resolution: dx=8mm,dy=8mm
Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm
Date of measurement: 2023-12-18

Experimental conditions.

Device Position	Validation plane
Band	2450 MHz
Channels	-
Signal	CW
Frequency (MHz)	2450
Relative permittivity	40.02
Conductivity (S/m)	1.79
Probe	SN 25/22 EPGO376
ConvF	1.63
Crest factor:	1:1

SURFACE SAR	**VOLUME SAR**
	

Maximum location: X=3.00, Y=-1.00

SAR 10g (W/Kg)	2.425024
SAR 10g (W/Kg)	5.366586

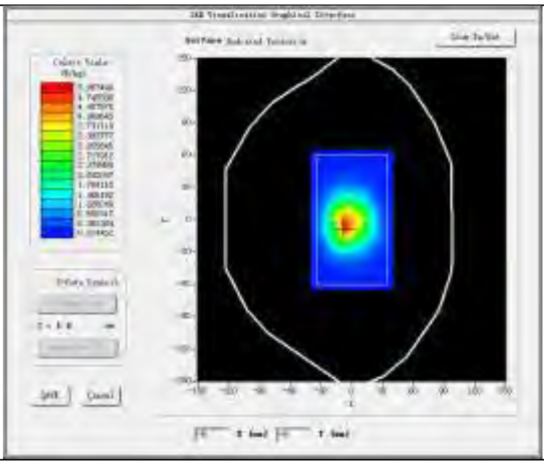
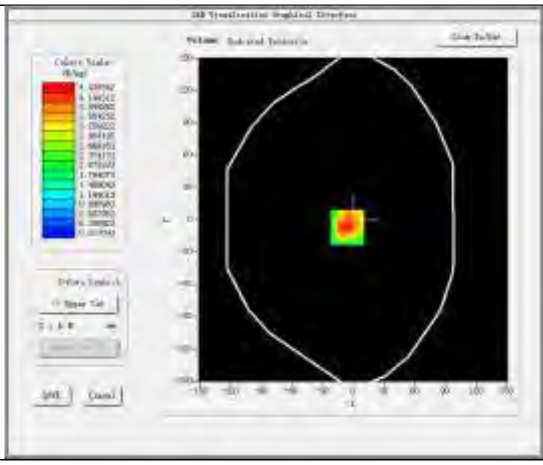
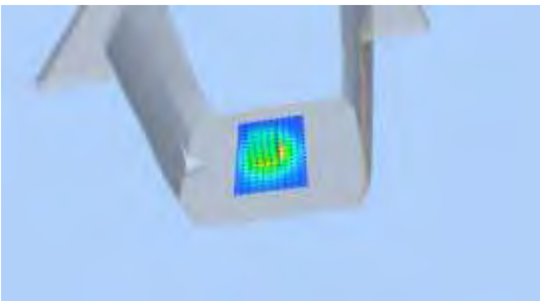
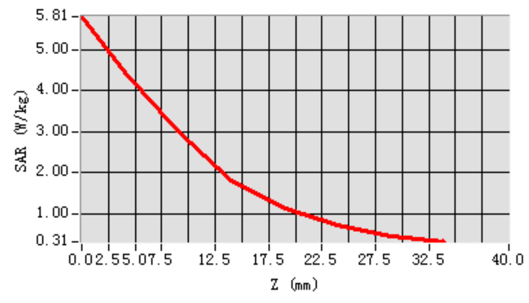
Appendix B. SAR Test Plots

Plot 1: DUT: Clip V3; EUT Model: 3530003

Test Date	2023-12-14
Probe	SN 25/22 EPGO376
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Front Side
Band	GPRS 850
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)
Frequency (MHz)	848.8
Relative permittivity (real part)	41.36
Conductivity (S/m)	0.92

Maximum location: X=-6.00, Y=-7.00
SAR Peak: 6.64 W/kg

SAR 10g (W/Kg)	2.422860
SAR 10g (W/Kg)	4.246222

SURFACE SAR	VOLUME SAR
	
3D screen shot	**Z Axis Scan**
	

Plot 2: DUT: Clip V3; EUT Model: 3530003

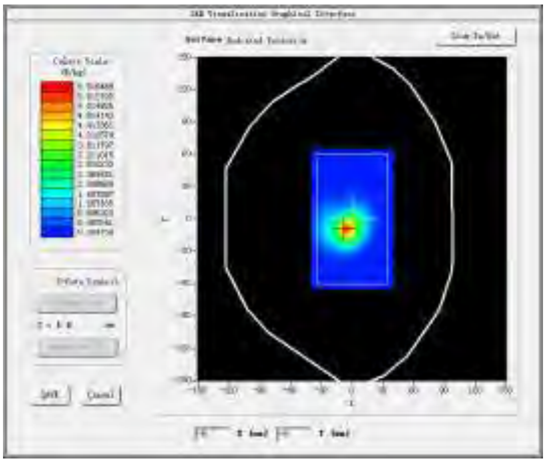
Test Date	2023-12-15
Probe	SN 25/22 EPGO376
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Front Side
Band	GPRS 1900
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)
Frequency (MHz)	1880
Relative permittivity (real part)	39.91
Conductivity (S/m)	1.38

Maximum location: X=-6.00, Y=-9.00

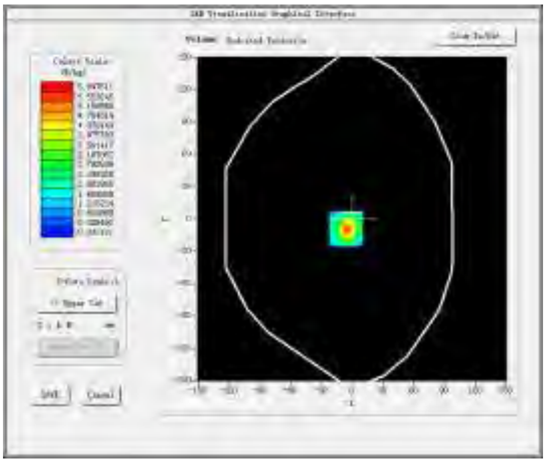
SAR Peak: 10.06 W/kg

SAR 10g (W/Kg)	2.399515
SAR 10g (W/Kg)	5.405863

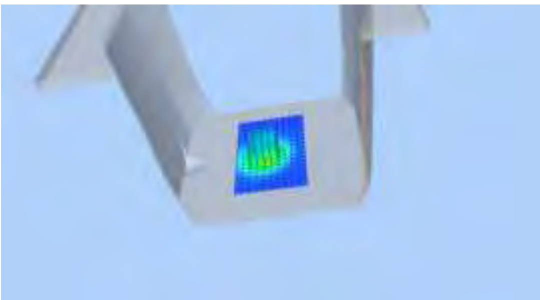
SURFACE SAR



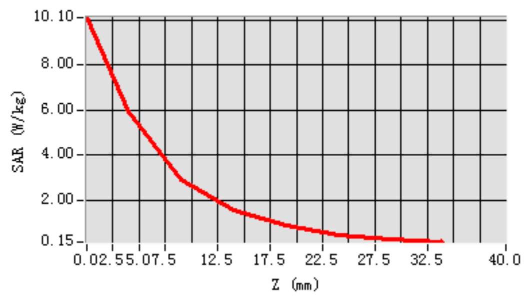
VOLUME SAR



3D screen shot



Z Axis Scan



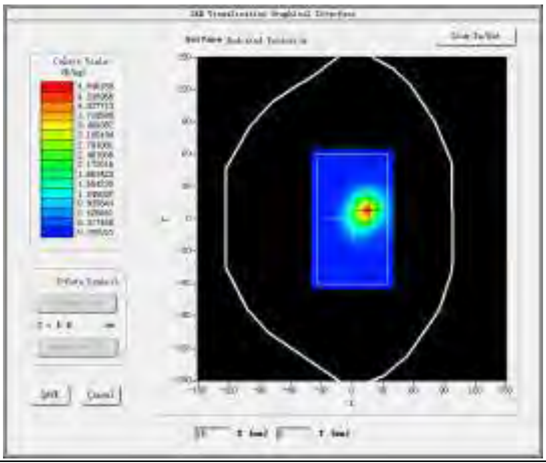
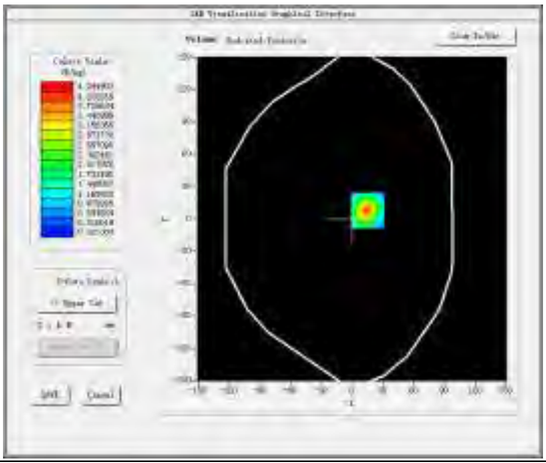
Plot 3: DUT: Clip V3; EUT Model: 3530003

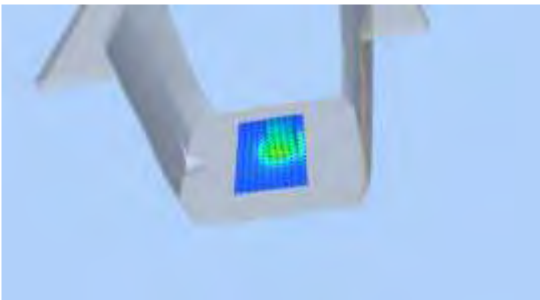
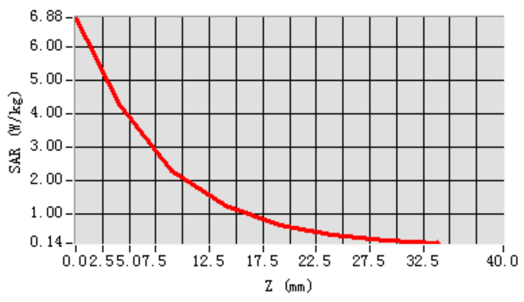
Test Date	2023-12-15
Probe	SN 25/22 EPGO376
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Front Side
Band	WCDMA Band II
Signal	WCDMA (Crest factor: 1.0)
Frequency (MHz)	1880
Relative permittivity (real part)	41.39
Conductivity (S/m)	1.38

Maximum location: X=15.00, Y=8.00

SAR Peak: 6.84 W/kg

SAR 10g (W/Kg)	1.817490
SAR 10g (W/Kg)	3.912815

SURFACE SAR	VOLUME SAR
	

3D screen shot	Z Axis Scan
	

Plot 4: DUT: Clip V3; EUT Model: 3530003

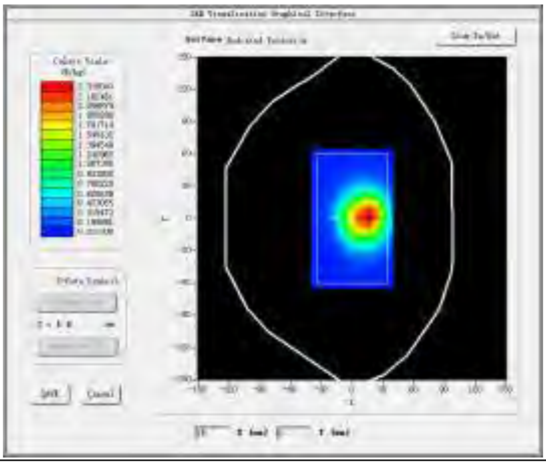
Test Date	2023-12-14
Probe	SN 25/22 EPGO376
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Front Side
Band	WCDMA Band V
Signal	WCDMA (Crest factor: 1.0)
Frequency (MHz)	846.6
Relative permittivity (real part)	41.70
Conductivity (S/m)	0.92

Maximum location: X=15.00, Y=2.00

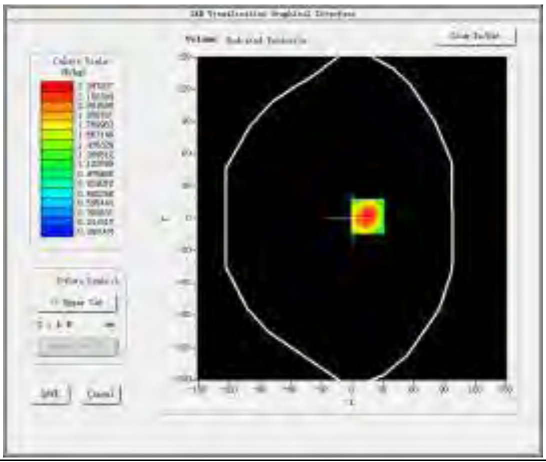
SAR Peak: 3.51 W/kg

SAR 10g (W/Kg)	1.276190
SAR 10g (W/Kg)	2.205813

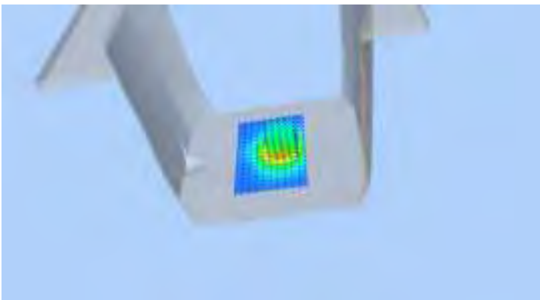
SURFACE SAR



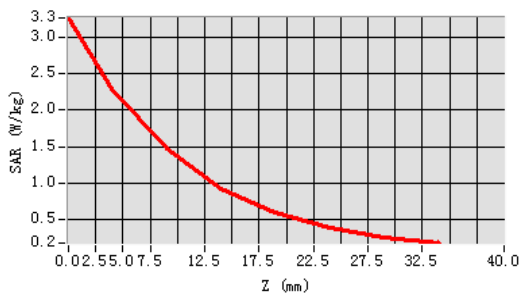
VOLUME SAR



3D screen shot



Z Axis Scan



Plot 5: DUT: Clip V3; EUT Model: 3530003

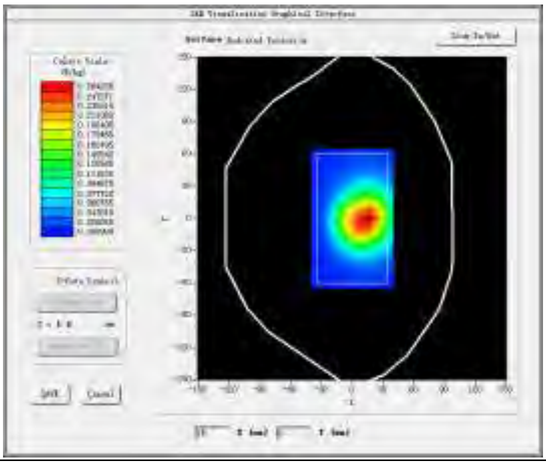
Test Date	2023-12-14
Probe	SN 25/22 EPGO376
Area Scan	dx=8mm dy=8mm
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Front Side
Band	2.4GHz WLAN
Signal	IEEE802.b (Crest factor: 1.0)
Frequency (MHz)	2462
Relative permittivity (real part)	40.34
Conductivity (S/m)	1.83

Maximum location: X=14.00, Y=-1.00

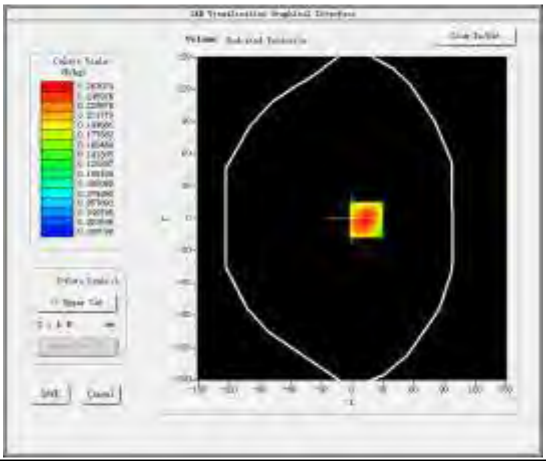
SAR Peak: 0.37 W/kg

SAR 10g (W/Kg)	0.162106
SAR 10g (W/Kg)	0.254314

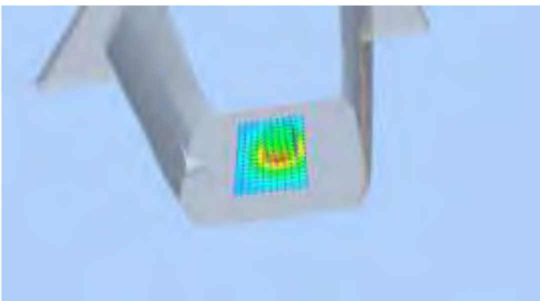
SURFACE SAR



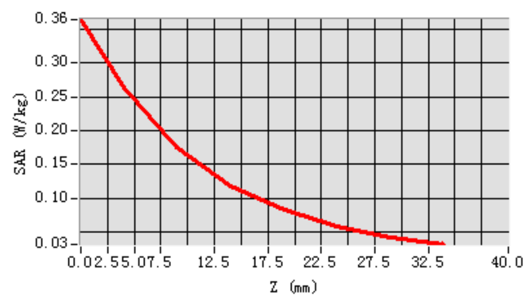
VOLUME SAR



3D screen shot



Z Axis Scan



CALIBRATION CERTIFICATES

Probe-EPGO376 Calibration Certificate

COMOSAR E-Field Probe Calibration Report

Ref : ACR.180.4.22.BES.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.
1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD
BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: SN 25/22 EPGO376

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

Calibration date: 06/29/2022

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

Summary:

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

	Name	Function	Date	Signature
Prepared by :	Jérôme Le Gall	Measurement Responsible	6/30/2022	
Checked & approved by:	Jérôme Luc	Technical Manager	6/30/2022	
Authorized by:	Yann Toutain	Laboratory Director	6/30/2022	

2022.06.30
13:37:53 +02'00'

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	*Name*	*Date*	*Modifications*
A	Jérôme Le Gall	6/30/2022	Initial release

TABLE OF CONTENTS

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	SN 25/22 EPGO376
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-6GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.193 MΩ Dipole 2: R2=0.188 MΩ Dipole 3: R3=0.198 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

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

Figure 1 – *MVG COMOSAR Dosimetric E field Probe*

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

3 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their 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 to 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°).

3.1 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.

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

$$\mathrm{SAR}_{uncertainty}[\%] = \delta\mathrm{SAR}_{be}\frac{(d_{be}+d_{step})^2}{2d_{step}}\frac{(e^{-d_{be}/(\delta/2)})}{\delta/2} \quad \text{for } (d_{be}+d_{step})<10\ \text{mm}$$

where

$\mathrm{SAR}_{uncertainty}$	is the uncertainty in percent of the probe boundary effect
d_{be}	is the distance between the surface and the closest *zoom-scan* measurement point, in millimetre
Δ_{step}	is the separation distance between the first and second measurement points that are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible
δ	is the minimum penetration depth in millimetres of the head tissue-equivalent liquids defined in this standard, i.e., $\delta \approx$ 14 mm at 3 GHz;
$\Delta\mathrm{SAR}_{be}$	in percent of SAR is the deviation between the measured SAR value, at the distance d_{be} from the boundary, and the analytical SAR value.

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

4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with 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 (%)**
Expanded uncertainty 95 % confidence level k = 2					14 %

5 CALIBRATION MEASUREMENT RESULTS

Calibration Parameters	
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

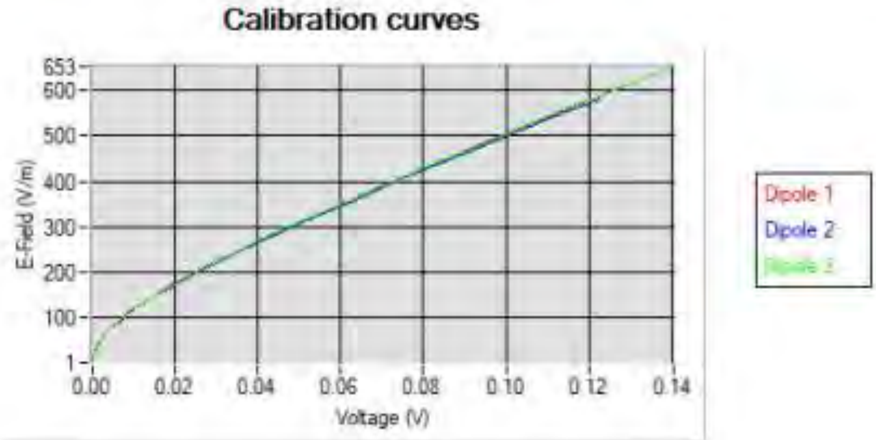
5.1 SENSITIVITY IN AIR

Normx dipole 1 (μV/(V/m)²)	Normy dipole 2 (μV/(V/m)²)	Normz dipole 3 (μV/(V/m)²)
0.76	0.78	0.76

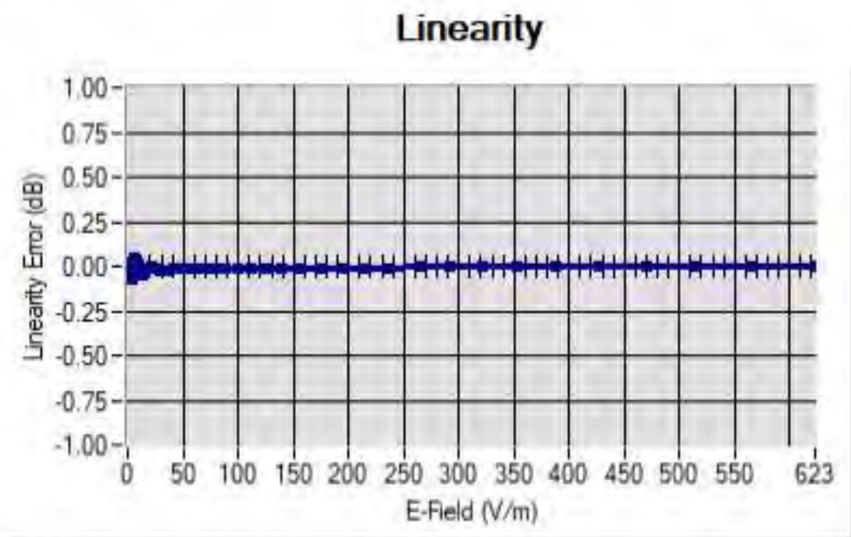
DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
106	107	108

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

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



5.2 LINEARITY



Linearity:+/-1.81% (+/-0.08dB)

5.3 SENSITIVITY IN LIQUID

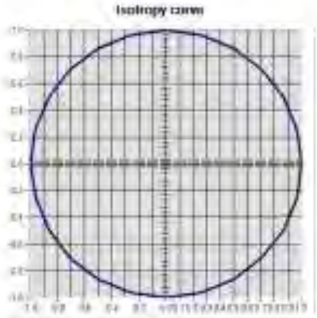
Liquid	Frequency (MHz +/- 100MHz)	ConvF
HL450*	450*	1.74*
BL450*	450*	1.67*
HL750	750	1.69
BL750	750	1.73
HL850	835	1.75
BL850	835	1.80
HL900	900	1.87
BL900	900	1.85
HL1800	1800	2.09
BL1800	1800	2.15
HL1900	1900	2.14
BL1900	1900	2.27
HL2000	2000	2.31
BL2000	2000	2.34
HL2300	2300	2.46
BL2300	2300	2.51
HL2450	2450	2.60
BL2450	2450	2.70
HL2600	2600	2.39
BL2600	2600	2.50
HL5200	5200	1.85
BL5200	5200	1.81
HL5400	5400	2.07
BL5400	5400	2.00
HL5600	5600	2.19
BL5600	5600	2.11
HL5800	5800	2.01
BL5800	5800	1.97

* Frequency not cover by COFRAC scope, calibration not accredited

LOWER DETECTION LIMIT: 7mW/kg

5.4 ISOTROPY

HL1800 MHz



6 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
CALIPROBE Test Bench	Version 2	NA	Validated. No cal required.	Validated. No cal required.
Network Analyzer	Rohde & Schwarz ZVM	100203	08/2021	08/2024
Network Analyzer	Agilent 8753ES	MY40003210	10/2019	10/2022
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Multimeter	Keithley 2000	1160271	02/2020	02/2023
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2024
Power Meter	Rohde & Schwarz NRVD	832839-056	11/2019	11/2022
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.

Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2021	06/2024

SID835Dipole Calibration Ceriticate

SATIMO
The microwave vision company

SAR Reference Dipole Calibration Report

Ref : ACR.287.4.14.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.
1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD
BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA
SATIMO COMOSAR REFERENCE DIPOLE
FREQUENCY: 835 MHZ
SERIAL NO.: SN 07/14 DIP 0G835-303

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

ilac-MRA
ACCREDITED

09/29/2021

Summary:

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

	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	10/12/2021	
Checked by :	Jérôme LUC	Product Manager	10/12/2021	
Approved by :	Kim RUTKOWSKI	Quality Manager	10/12/2021	

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	Date	Modifications
A	10/12/2021	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, OET 65 Bulletin C 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 835 MHz REFERENCE DIPOLE
Manufacturer	Satimo
Model	SID835
Serial Number	SN 07/14 DIP 0G835-303
Product Condition (new / used)	New

A yearly calibration interval is recommended.

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

Satimo's COMOSAR Validation Dipoles are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards. The product is designed for use with the COMOSAR test bench only.

Figure 1 – *Satimo COMOSAR Validation Dipole*

4 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C 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

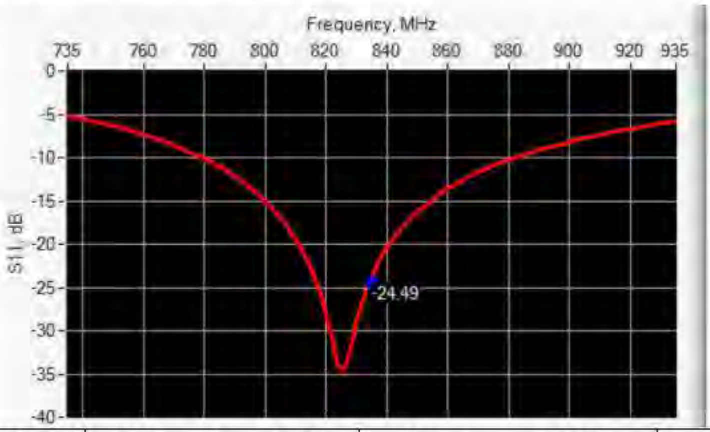
5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, 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



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
835	-24.49	-20	54.9 Ω + 2.8 jΩ

6.2 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 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.	PASS	89.8 ±1 %.	PASS	3.6 ±1 %.	PASS
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, OET 65 Bulletin C 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 %		0.87 ±5 %	
750	41.9 ±5 %		0.89 ±5 %	
835	41.5 ±5 %	PASS	0.90 ±5 %	PASS
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 %	

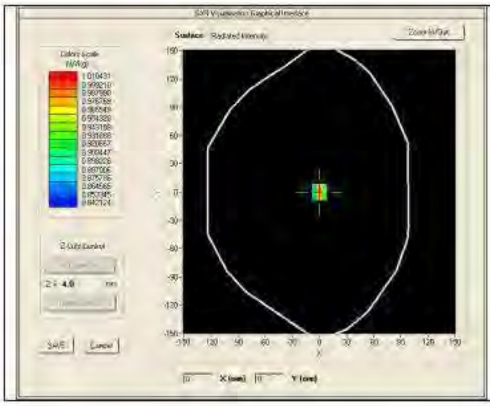
7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

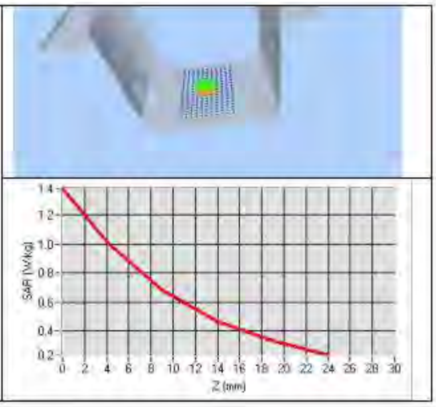
The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is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

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Head Liquid Values: eps' : 42.3 sigma : 0.92
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm

Zoon Scan Resolution	dx=8mm/dy=8m/dz=5mm
Frequency	835 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		3.06	
750	8.49		5.55	
835	9.56	9.60 (0.96)	6.22	6.20 (0.62)
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	





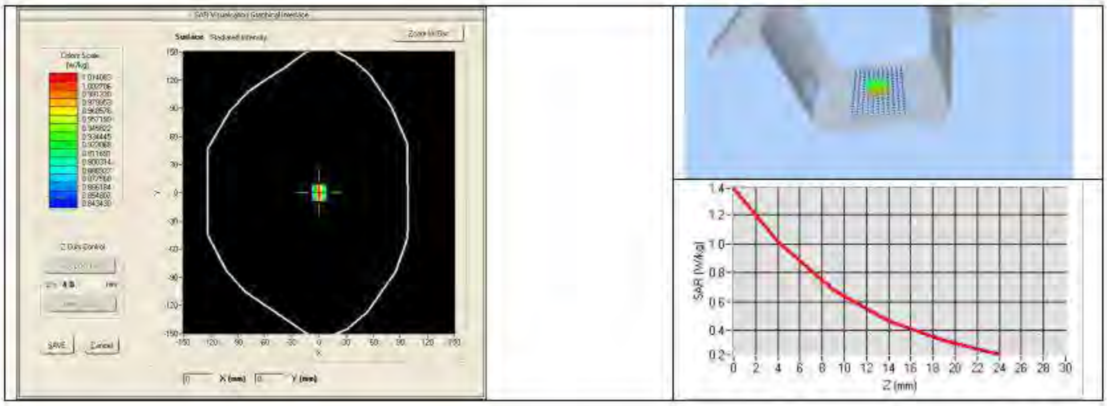
7.3 BODY LIQUID MEASUREMENT

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 %		0.94 ±5 %	
750	55.5 ±5 %		0.96 ±5 %	
835	55.2 ±5 %	PASS	0.97 ±5 %	PASS
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' : 54.1 sigma : 0.97
Distance between dipole center and liquid	15.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8m/dz=5mm
Frequency	835 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
835	9.90 (0.99)	6.39 (0.64)



8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	Satimo	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	02/2021	02/2024
Calipers	Carrera	CALIPER-01	12/2018	12/2021
Reference Probe	Satimo	EPG122 SN 18/11	10/2021	10/2022
Multimeter	Keithley 2000	1188656	12/2018	12/2021
Signal Generator	Agilent E4438C	MY49070581	12/2018	12/2021
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	12/2018	12/2021
Power Sensor	HP ECP-E26A	US37181460	12/2018	12/2021
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	11-661-9	8/2021	8/2024

SID1900 Dipole Calibration Certificate

SAR Reference Dipole Calibration Report

Ref : ACR.273.2.18.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.
1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD
BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA
MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 1900 MHZ
SERIAL NO.: SN 38/18 DIP 1G900-466

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

Calibration Date: 09/22/2021

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*
Prepared by :	Jérôme LUC	Product Manager	09/28/2021	
Checked by :	Jérôme LUC	Product Manager	09/28/2021	
Approved by :	Kim RUTKOWSKI	Quality Manager	09/28/2021	

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	*Date*	*Modifications*
A	09/28/2021	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 1900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1900
Serial Number	SN 38/18 DIP 1G900-466
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 constructed 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

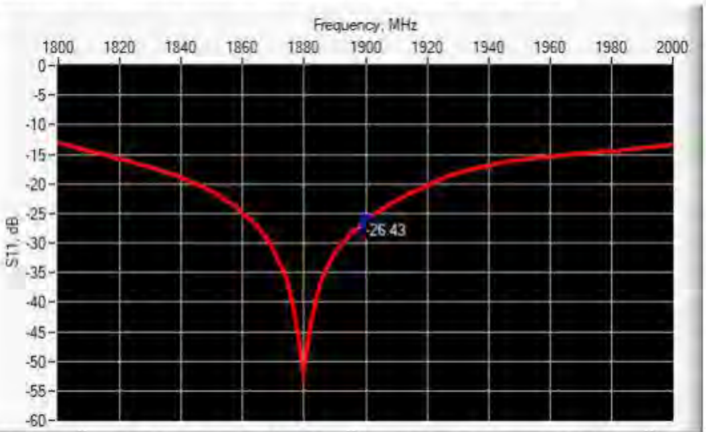
The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %

10 g	20.1 %

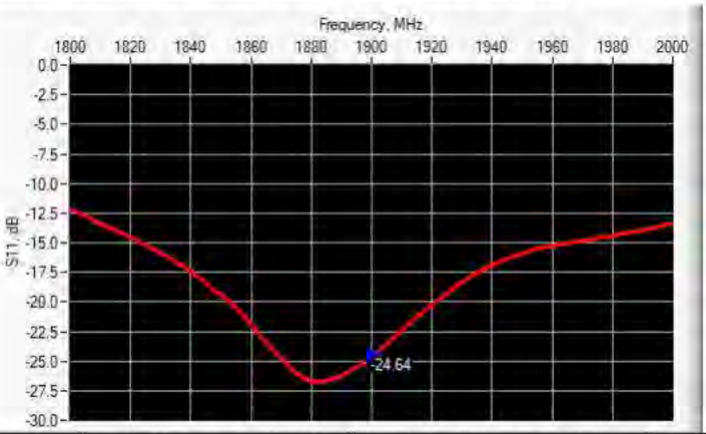
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-26.43	-20	50.5 Ω + 4.7 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-24.64	-20	46.2 Ω + 4.4 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 %.		166.7 ±1 %.		6.35 ±1 %.	
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 %.	PASS	39.5 ±1 %.	PASS	3.6 ±1 %.	PASS
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 %		0.87 ±5 %	
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 %	PASS	1.40 ±5 %	PASS
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 %	

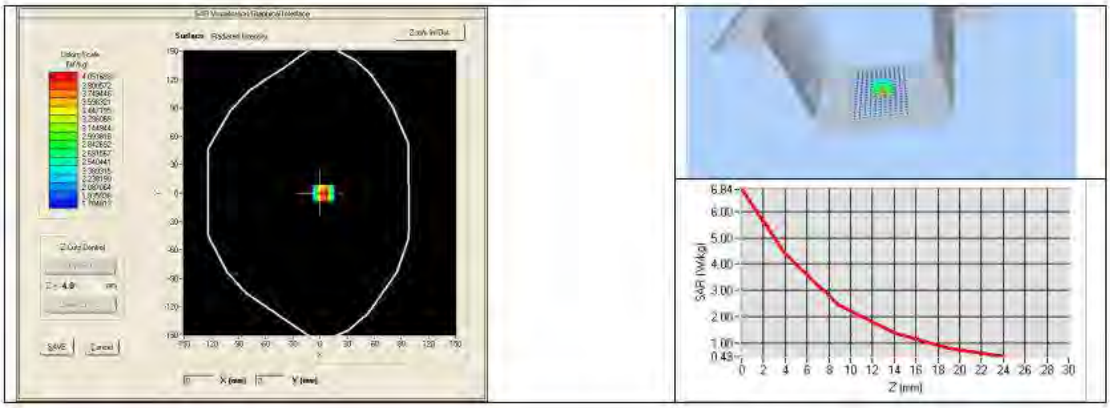
7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

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' : 38.5 sigma : 1.45
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 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		3.06	
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	40.03 (4.00)	20.5	20.55 (2.06)
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	
3700	67.4		24.2	



7.3 BODY LIQUID MEASUREMENT

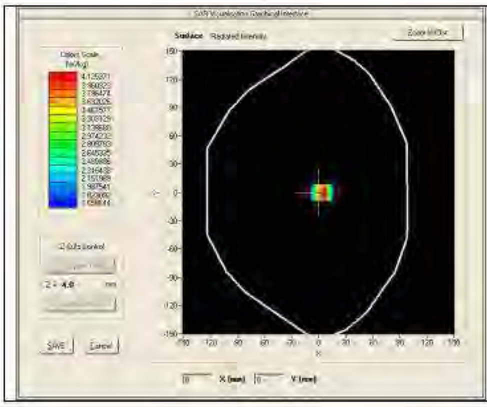
Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 ±5 %		0.80 ±5 %	
300	58.2 ±5 %		0.92 ±5 %	
450	56.7 ±5 %		0.94 ±5 %	
750	55.5 ±5 %		0.96 ±5 %	
835	55.2 ±5 %		0.97 ±5 %	
900	55.0 ±5 %		1.05 ±5 %	
915	55.0 ±5 %		1.06 ±5 %	
1450	54.0 ±5 %	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

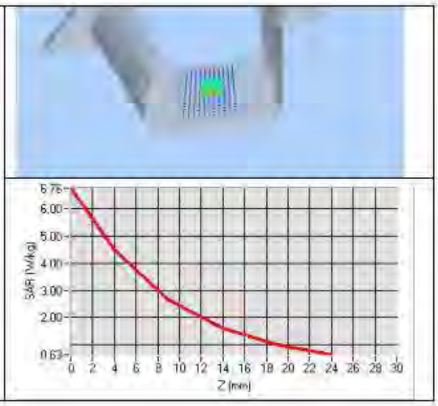
2300	52.9 ±5 %		1.81 ±5 %	
2450	52.7 ±5 %		1.95 ±5 %	
2600	52.5 ±5 %		2.16 ±5 %	
3000	52.0 ±5 %		2.73 ±5 %	
3500	51.3 ±5 %		3.31 ±5 %	
3700	51.0 ±5 %		3.55 ±5 %	
5200	49.0 ±10 %		5.30 ±10 %	
5300	48.9 ±10 %		5.42 ±10 %	
5400	48.7 ±10 %		5.53 ±10 %	
5500	48.6 ±10 %		5.65 ±10 %	
5600	48.5 ±10 %		5.77 ±10 %	
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' : 53.3 sigma : 1.56
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 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
1900	40.91 (4.09)	21.40 (2.14)





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	06/2021	06/2024
Calipers	Carrera	CALIPER-01	01/2023	01/2026
Reference Probe	MVG	EPG122 SN 18/11	08/2023	08/2024
Multimeter	Keithley 2000	1188656	01/2023	01/2026
Signal Generator	Agilent E4438C	MY49070581	01/2023	01/2026
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	11/2023	11/2026
Power Sensor	HP ECP-E26A	US37181460	01/2023	01/2026
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	11/2023	11/2026

SID2450 Dipole Calibration Ceriticate

SAR Reference Dipole Calibration Report

Ref : ACR.287.8.14.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.
1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD
BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA
SATIMO COMOSAR REFERENCE DIPOLE
FREQUENCY: 2450 MHZ
SERIAL NO.: SN 07/14 DIP 2G450-306

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

09/29/2021

Summary:

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

	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	10/12/2021	
Checked by :	Jérôme LUC	Product Manager	10/12/2021	
Approved by :	Kim RUTKOWSKI	Quality Manager	10/12/2021	

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	Date	Modifications
A	10/12/2021	Initial release

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1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, OET 65 Bulletin C 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 2450 MHz REFERENCE DIPOLE
Manufacturer	Satimo
Model	SID2450
Serial Number	SN 07/14 DIP 2G450-306
Product Condition (new / used)	New

A yearly calibration interval is recommended.

3 PRODUCT DESCRIPTION

3.1 GENERAL INFORMATION

Satimo's COMOSAR Validation Dipoles are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards. The product is designed for use with the COMOSAR test bench only.

Figure 1 – *Satimo COMOSAR Validation Dipole*

4 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C 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

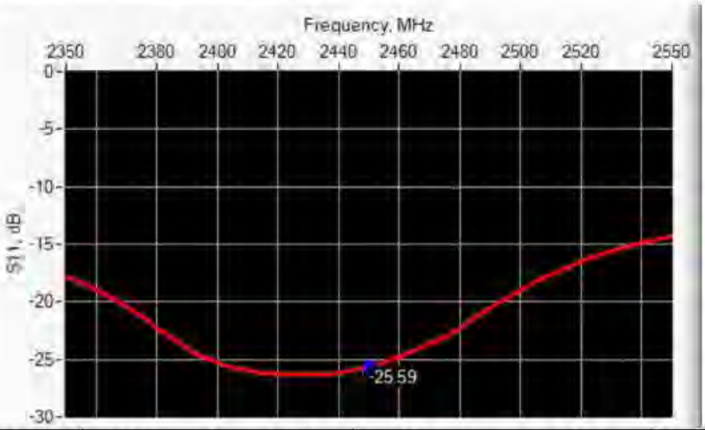
5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, 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



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
2450	-25.59	-20	44.7 Ω - 1.1 jΩ

6.2 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 %.		166.7 ±1 %.		6.35 ±1 %.	
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 %.	PASS	30.4 ±1 %.	PASS	3.6 ±1 %.	PASS
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, OET 65 Bulletin C 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 %		0.87 ±5 %	
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 %	PASS	1.80 ±5 %	PASS
2600	39.0 ±5 %		1.96 ±5 %	
3000	38.5 ±5 %		2.40 ±5 %	
3500	37.9 ±5 %		2.91 ±5 %	

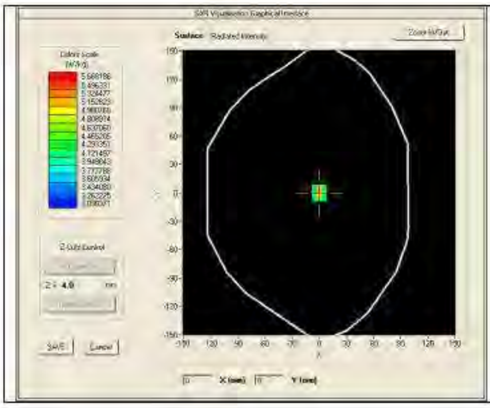
7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

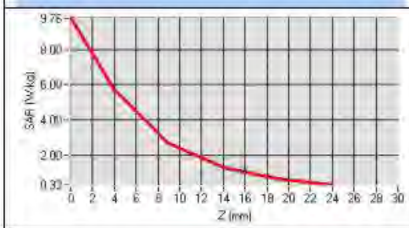
The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is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

Software	OPENSAR V4
Phantom	SN 20/09 SAM71
Probe	SN 18/11 EPG122
Liquid	Head Liquid Values: eps' : 39.0 sigma : 1.77
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm

Zoom Scan Resolution	dx=8mm/dy=8m/dz=5mm
Frequency	2450 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		3.06	
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	53.89 (5.39)	24	24.15 (2.42)
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	





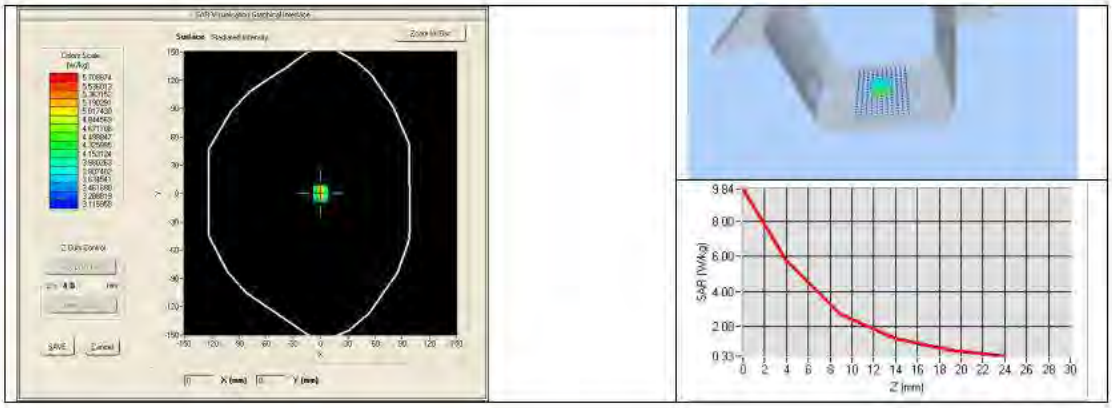
7.3 BODY LIQUID MEASUREMENT

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 %		0.94 ±5 %	
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 %	PASS	1.95 ±5 %	PASS
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' : 53.0 sigma : 1.93
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8m/dz=5mm
Frequency	2450 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
2450	54.65 (5.46)	24.58 (2.46)



8 LIST OF EQUIPMENT

Equipment Summary Sheet				
Equipment Description	**Manufacturer / Model**	**Identification No.**	**Current Calibration Date**	**Next Calibration Date**
SAM Phantom	Satimo	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	02/2021	02/2024
Calipers	Carrera	CALIPER-01	12/2018	12/2021
Reference Probe	Satimo	EPG122 SN 18/11	10/2021	10/2022
Multimeter	Keithley 2000	1188656	12/2018	12/2021
Signal Generator	Agilent E4438C	MY49070581	12/2018	12/2021
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	12/2018	12/2021
Power Sensor	HP ECP-E26A	US37181460	12/2018	12/2021
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	11-661-9	8/2021	8/2024

SAR Reference Dipole Calibration Report

Ref : ACR.273.2.18.SATU.A

SHENZHEN LCS COMPLIANCE TESTING LABORATORY LTD.
1F., XINGYUAN INDUSTRIAL PARK, TONGDA ROAD, BAO'AN BLVD
BAO'AN DISTRICT, SHENZHEN, GUANGDONG, CHINA
MVG COMOSAR REFERENCE DIPOLE
FREQUENCY: 1900 MHZ
SERIAL NO.: SN 38/18 DIP 1G900-466

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

Calibration Date: 09/22/2021

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
Prepared by :	Jérôme LUC	Product Manager	09/28/2021	
Checked by :	Jérôme LUC	Product Manager	09/28/2021	
Approved by :	Kim RUTKOWSKI	Quality Manager	09/28/2021	

	Customer Name
Distribution :	Shenzhen LCS Compliance Testing Laboratory Ltd.

Issue	Date	Modifications
A	09/28/2021	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 1900 MHz REFERENCE DIPOLE
Manufacturer	MVG
Model	SID1900
Serial Number	SN 38/18 DIP 1G900-466
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 constructed 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

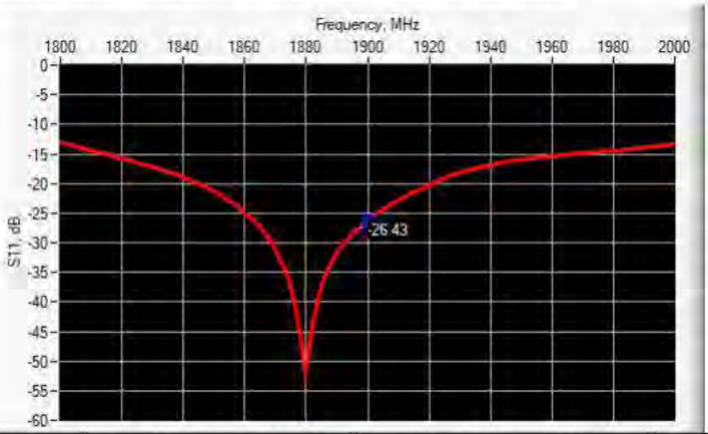
The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %

10 g	20.1 %

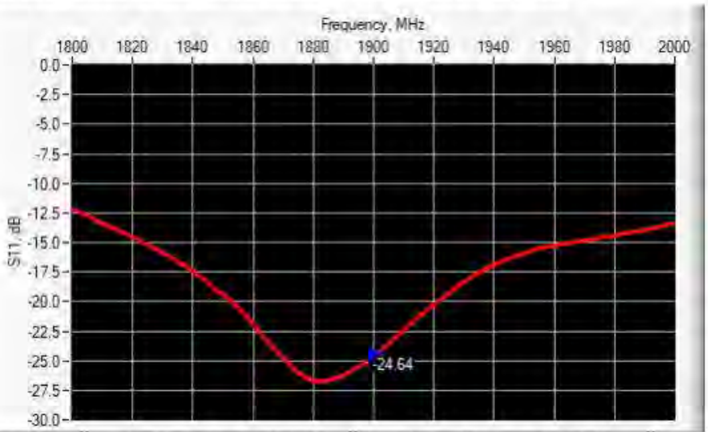
6 CALIBRATION MEASUREMENT RESULTS

6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-26.43	-20	50.5 Ω + 4.7 jΩ

6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-24.64	-20	46.2 Ω + 4.4 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 %.		166.7 ±1 %.		6.35 ±1 %.	
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 %.	PASS	39.5 ±1 %.	PASS	3.6 ±1 %.	PASS
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 %		0.87 ±5 %	
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 %	PASS	1.40 ±5 %	PASS
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 %	

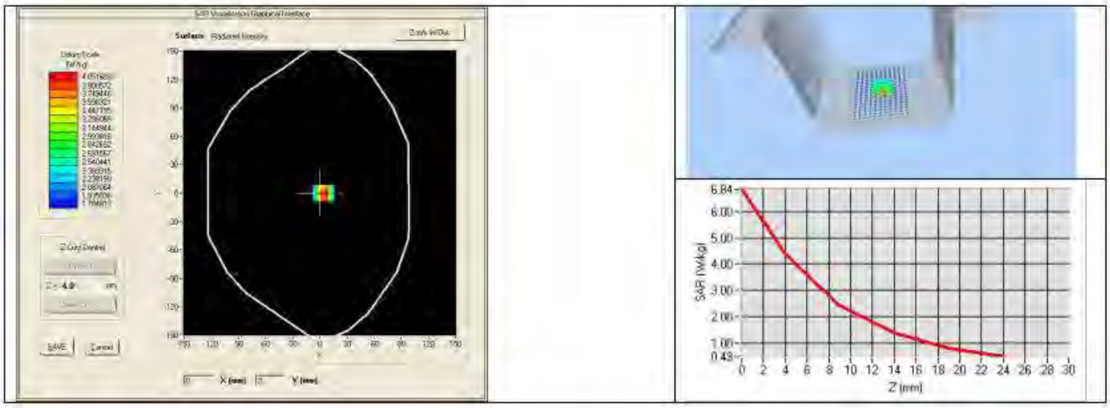
7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

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' : 38.5 sigma : 1.45
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 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		3.06	
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	40.03 (4.00)	20.5	20.55 (2.06)
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	
3700	67.4		24.2	



7.3 BODY LIQUID MEASUREMENT

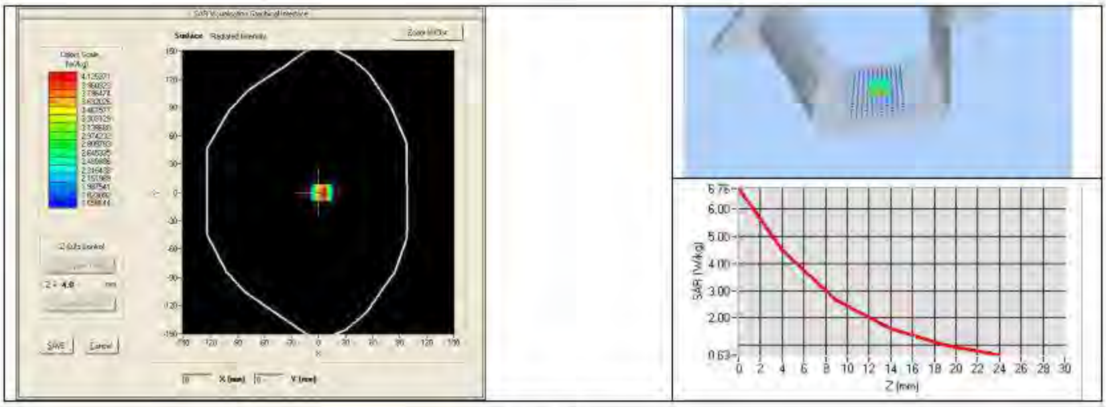
Frequency MHz	Relative permittivity (ε_r')		Conductivity (σ) S/m	
	required	measured	required	measured
150	61.9 ±5 %		0.80 ±5 %	
300	58.2 ±5 %		0.92 ±5 %	
450	56.7 ±5 %		0.94 ±5 %	
750	55.5 ±5 %		0.96 ±5 %	
835	55.2 ±5 %		0.97 ±5 %	
900	55.0 ±5 %		1.05 ±5 %	
915	55.0 ±5 %		1.06 ±5 %	
1450	54.0 ±5 %	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

2300	52.9 ±5 %		1.81 ±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 %	
3700	51.0 ±5 %		3.55 ±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' : 53.3 sigma : 1.56
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm
Frequency	1900 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
1900	40.91 (4.09)	21.40 (2.14)

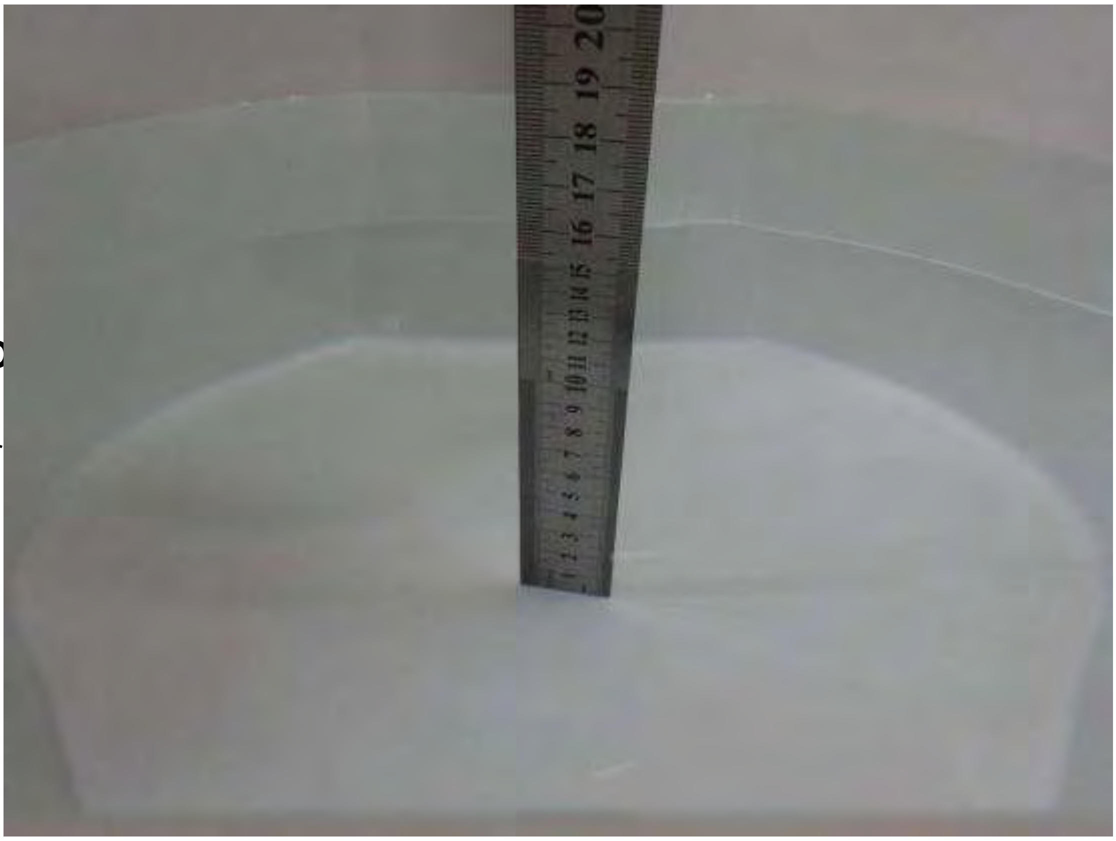


8 LIST OF EQUIPMENT

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	06/2021	06/2024
Calipers	Carrera	CALIPER-01	01/2020	01/2023
Reference Probe	MVG	EPG122 SN 18/11	08/2021	08/2022
Multimeter	Keithley 2000	1188656	01/2020	01/2023
Signal Generator	Agilent E4438C	MY49070581	01/2020	01/2023
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	HP E4418A	US38261498	11/2020	11/2023
Power Sensor	HP ECP-E26A	US37181460	01/2020	01/2023
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	11/2020	11/2023

SAR System PHOTOGRAPHS

Liquid depth≧15cm



SETUP PHO

Please refer

EUT PHOTOGRAPHS

Please refer to separated files for Test Setup Photos of SAR

.....................The End of Test Report.........................