



FCC SAR TEST REPORT

Application No: ZR/2021/10026
Applicant: VTech Telecommunications Ltd.
Manufacturer: VTech Telecommunications Ltd.
Factory: VTech (Dongguan) Telecommunications Limited.
Product Name: 2.4G WIFI Baby Monitor
Model No.(EUT): VM901 PU, VM901-2 PU, VM901-ab PU
Trade Mark: VTech
FCC ID: EW780-1957-01A
Standards: FCC 47CFR §2.1093
Date of Receipt: 2021-01-19
Date of Test: 2021-02-17 to 2021-02-17
Date of Issue: 2021-02-20
Test conclusion: **PASS ***

* In the configuration tested, the EUT detailed in this report complied with the standards specified above.

Authorized Signature:

Derek Yang

Wireless Laboratory Manager

The manufacturer should ensure that all products in series production are in conformity with the product sample detailed in this report.

If the product in this report is used in any configuration other than that detailed in the report, the manufacturer must ensure the new system complies with all relevant standards. Any mention of SGS International Electrical Approvals or testing done by SGS International Electrical Approvals in connection with, distribution or use of the product described in this report must be approved by SGS International Electrical Approvals in writing.



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Shenzhen Branch Testing Center FCC Laboratory

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REVISION HISTORY

Report Number	Revision	Description	Issue Date
ZR/2021/1002601	01	Original	2021-02-20





TEST SUMMARY

Frequency Band	Maximum Reported SAR(W/kg)
	Body
WI-FI (2.4GHz)	0.51
SAR Limited(W/kg)	1.6

Approved & Released by

Simon Ling

SAR Manager

Tested by

Jackson Li

SAR Engineer



SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing Center (CCC Laboratory)

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1 General Information

1.1 Details of Client

Applicant:	VTech Telecommunications Ltd.
Address:	23/F, Tai Ping Industrial Centre, Block 1,57 Ting Kok Road, Tai Po, Hong Kong.
Manufacturer:	VTech Telecommunications Ltd.
Address:	23/F, Tai Ping Industrial Centre, Block 1,57 Ting Kok Road, Tai Po, Hong Kong.
Factory:	VTech (Dongguan) Telecommunications Limited.
Address:	VTech Science Park, Xia Ling Bei Management Zone, Liaobu, Dongguan, Guangdong, China.

1.2 Test Location

Company: SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch
Address: No. 1 Workshop, M-10, Middle section, Science & Technology Park, Shenzhen, Guangdong, China
Post code: 518057
Telephone: +86 (0) 755 2601 2053
Fax: +86 (0) 755 2671 0594
E-mail: ee.shenzhen@sgs.com



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1.3 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

- **CNAS (No. CNAS L2929)**

CNAS has accredited SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch EMC Lab to ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories (CNAS-CL01 Accreditation Criteria for the Competence of Testing and Calibration Laboratories) for the competence in the field of testing.

- **A2LA (Certificate No. 3816.01)**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

- **VCCI**

The 10m Semi-anechoic chamber and Shielded Room of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-823, R-4188, T-1153 and C-2383 respectively.

- **FCC –Designation Number: CN1178**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1178. Test Firm Registration Number: 406779.

- **Industry Canada (IC)**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006

IC#: 4620C.



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1.4 General Description of EUT

Device Type :	portable device		
Exposure Category:	uncontrolled environment / general population		
Product Name:	2.4G WIFI Baby Monitor		
Model No.(EUT):	VM901 PU, VM901-2 PU, VM901-ab PU		
FCC ID:	EW780-1957-01A		
SN:	A1		
Trade Mark:	VTech		
Product Phase:	production unit		
Hardware Version:	V001		
Firmware version:	V1.3.0.3		
Antenna Type:	Integrated Antenna		
Device Operating Configurations :			
Modulation Mode:	WIFI: DSSS; OFDM		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
	WIFI 2.4G	2412~2462	2412~2462
Battery Information:	Model: I9300		
	Rated capacity: 3.8V, 2100mAh		
	Manufacturer: Zhongshan Tianmao Battery Co., Ltd.		

Declaration of EUT Family Grouping:

Model No.: VM901 PU, VM901-2 PU, VM901-ab PU only the model VM901 PU was tested, since the electrical circuit design, PCB layout, components used, internal wiring and functions were identical for the above models, with only differences on model No and color of appearance.





1.4.1 DUT Antenna Locations(Back View)

Please see the Appendix D.

The test device is a Video Monitor with Remote Access. The overall diagonal dimension of this device is 184mm.

According to the distance between Wifi antennas and the sides of the EUT we can draw the conclusion that:

EUT Sides for SAR Testing						
Mode	Front	Back	Left	Right	Top	Bottom
2.4G WIFI with antenna closed	Yes	Yes	No	No	Yes	No
2.4G WIFI with external antenna	Yes	Yes	No	No	No	No

Table 1: EUT Sides for SAR Testing





1.5 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE Std C95.1 – 1992	Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 248227 D01	SAR Guidance for IEEE 802.11 Wi-Fi SAR v02r02
KDB 941225 D07	SAR Evaluation Procedures for UMPC Mini-Tablet Devices v01r02
KDB 648474 D04	Handset SAR v01r03
KDB 447498 D01	General RF Exposure Guidance v06
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02





1.6 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	1.60 W/kg	8.00 W/kg
Spatial Average SAR** (Whole Body)	0.08 W/kg	0.40 W/kg
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 W/kg	20.00 W/kg

Notes:

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

** The Spatial Average value of the SAR averaged over the whole body.

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

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

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





2 Laboratory Environment

Temperature	Min. = 18°C, Max. = 25 °C
Relative humidity	Min. = 30%, Max. = 70%
Ground system resistance	< 0.5 Ω
Ambient noise is checked and found very low and in compliance with requirement of standards.	
Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

Table 2 : The Ambient Conditions



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3 SAR Measurements System Configuration

3.1 The SAR Measurement System

This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation $SAR = \sigma (|E|^2) / \rho$ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

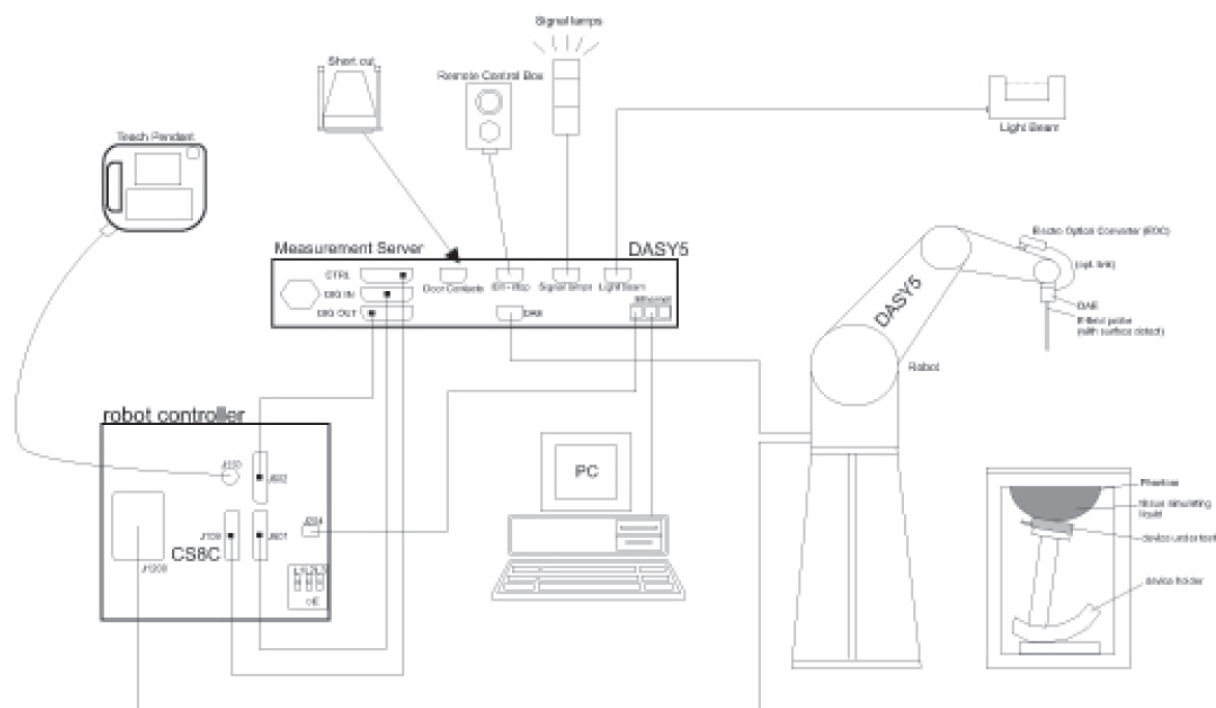
The DASY5 system for performing compliance tests consists of the following items:

A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software .An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.



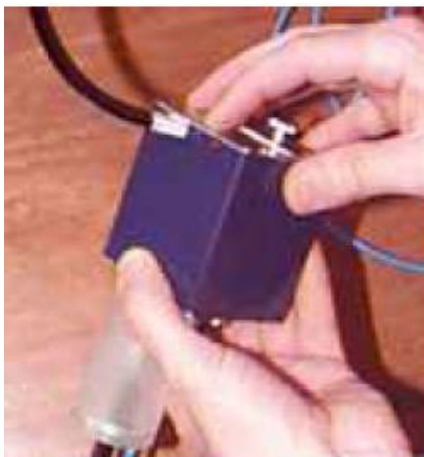
F-1. SAR Measurement System Configuration

- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7.
- DASY5 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

3.2 Isotropic E-field Probe EX3DV4

	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μ W/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

3.3 Data Acquisition Electronics (DAE)

Model	DAE	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)	
Input Offset Voltage	< 5μV (with auto zero)	
Input Bias Current	< 50 f A	
Dimensions	60 x 60 x 68 mm	

3.4 SAM Twin Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	
Wooden Support	SPEAG standard phantom table	

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

3.5 ELI Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)
Liquid	Compatible with all SPEAG tissue
Compatibility	simulating liquids (incl. DGBE type)
Shell Thickness	2.0 ± 0.2 mm (bottom plate)
Dimensions	Major axis: 600 mm Minor axis: 400 mm
Filling Volume	approx. 30 liters
Wooden Support	SPEAG standard phantom table



Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.

ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure.



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3.6 Device Holder for Transmitters



F-2. Device Holder for Transmitters

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon=3$ and loss tangent $\delta=0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.





3.7 Measurement procedure

3.7.1 Scanning procedure

Step 1: Power reference measurement

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: Area scan

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm. Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Zoom scan

Around this point, a volume of 30mm*30mm*30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5x5x7 points ($\leq 2\text{GHz}$) and 7x7x7 points ($\geq 2\text{GHz}$). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification). The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

The area and zoom scan resolutions specified in the table below must be applied to the SAR measurements. Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2003.



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			$\leq 3 \text{ GHz}$	$> 3 \text{ GHz}$
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			$5 \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location			$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$			$\leq 2 \text{ GHz}: \leq 15 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 12 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 12 \text{ mm}$ $4 - 6 \text{ GHz}: \leq 10 \text{ mm}$
			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 $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			$\leq 2 \text{ GHz}: \leq 8 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz}: \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz}: \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 4 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 3 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
	graded grid	$\Delta z_{\text{Zoom}}(1)$: between 1 st two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 3 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$	
Minimum zoom scan volume	x, y, z		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz}: \geq 28 \text{ mm}$ $4 - 5 \text{ GHz}: \geq 25 \text{ mm}$ $5 - 6 \text{ GHz}: \geq 22 \text{ mm}$
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <u>reported</u> SAR from the <u>area scan based 1-g SAR estimation</u> procedures of KDB 447498 is $\leq 1.4 \text{ W/kg}$, $\leq 8 \text{ mm}$, $\leq 7 \text{ mm}$ and $\leq 5 \text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max. $\pm 5 \%$



3.7.2 Data Storage

The DASY 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 with the extension ".DAE". 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], [m W/g], [m W/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.

3.7.3 Data Evaluation by SEMCAD

The SEMCAD 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	ε
- 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 DASY 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:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

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

U_i = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp i = diode compression point (DASY parameter)

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





E-field probes:

$$E_i = (V_i / \text{Norm}_i \cdot \text{ConvF})^{1/2}$$

H-field probes:

$$H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1}f + a_{i2}f^2) / f$$

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

Norm_i = sensor sensitivity of channel i ($i = x, y, z$)

[mV/(V/m)²] for E-field Probes

ConvF = sensitivity enhancement in solution

a_{ij} = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

E_i = electric field strength of channel i in V/m

H_i = magnetic field strength of channel i in A/m

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

$$E_{tot} = (E_x^2 + E_y^2 + E_z^2)^{1/2}$$

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

$$SAR = (E_{tot}^2 \cdot \sigma) / (\epsilon \cdot 1000)$$

with SAR = local specific absorption rate in mW/g

E_{tot} = total field strength in V/m

σ = conductivity in [mho/m] or [Siemens/m]

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

$$P_{pwe} = E_{tot}^2 / 3770 \text{ or } P_{pwe} = H_{tot}^2 \cdot 37.7$$

with P_{pwe} = equivalent power density of a plane wave in mW/cm²

E_{tot} = total electric field strength in V/m

H_{tot} = total magnetic field strength in A/m



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4 SAR measurement variability and uncertainty

4.1 SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.

3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg ($\sim 10\%$ from the 1-g SAR limit).

4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

4.2 SAR measurement uncertainty

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.



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SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing Center EMC Laboratory

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Shenzhen, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgsgroup.com.cn
中国·深圳·科技园中区M-10栋一号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com



5 Description of Test Position

5.1 Body Exposure Condition

The test procedures are applicable to devices with a display and overall diagonal dimension ≤ 20 cm ($\sim 7.9''$). These devices are typically operated like a mini-tablet and are usually designed with certain UMPC features and operating characteristics; therefore, the term "UMPC Mini-Tablet" is used to identify the SAR test requirements for this category of devices. A composite test separation distance of 5 mm is applied to test UMPC mini-tablet transmitters and to maintain RF exposure conservativeness for the interactive operations associated with this type of devices.



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6 SAR System Verification Procedure

6.1 Tissue Simulate Liquid

6.1.1 Recipes for Tissue Simulate Liquid

The following tables give the recipes for tissue simulating liquids to be used in different frequency bands:

Ingredients (% by weight)	Frequency (MHz)				
	450	900	1800-2000	2300-2500	2500-2700
Water	38.56	40.30	55.24	55.00	54.92
Salt (NaCl)	3.95	1.38	0.31	0.2	0.23
Sucrose	56.32	57.90	0	0	0
HEC	0.98	0.24	0	0	0
Bactericide	0.19	0.18	0	0	0
Tween	0	0	44.45	44.80	44.85
Salt: 99+% Pure Sodium Chloride					
Sucrose: 98+% Pure Sucrose					
Water: De-ionized, 16 MΩ ⁺ resistivity					
HEC: Hydroxyethyl Cellulose					
Tween: Polyoxyethylene (20) sorbitan monolaurate					

Table 3 : Recipe of Tissue Simulate Liquid





6.1.2 Measurement for Tissue Simulate Liquid

The dielectric properties for this Tissue Simulate Liquids were measured by using the Agilent Model 85070E Dielectric Probe in conjunction with Agilent E5071C Network Analyzer (300 KHz-8500 MHz). The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was $22 \pm 2^\circ\text{C}$.

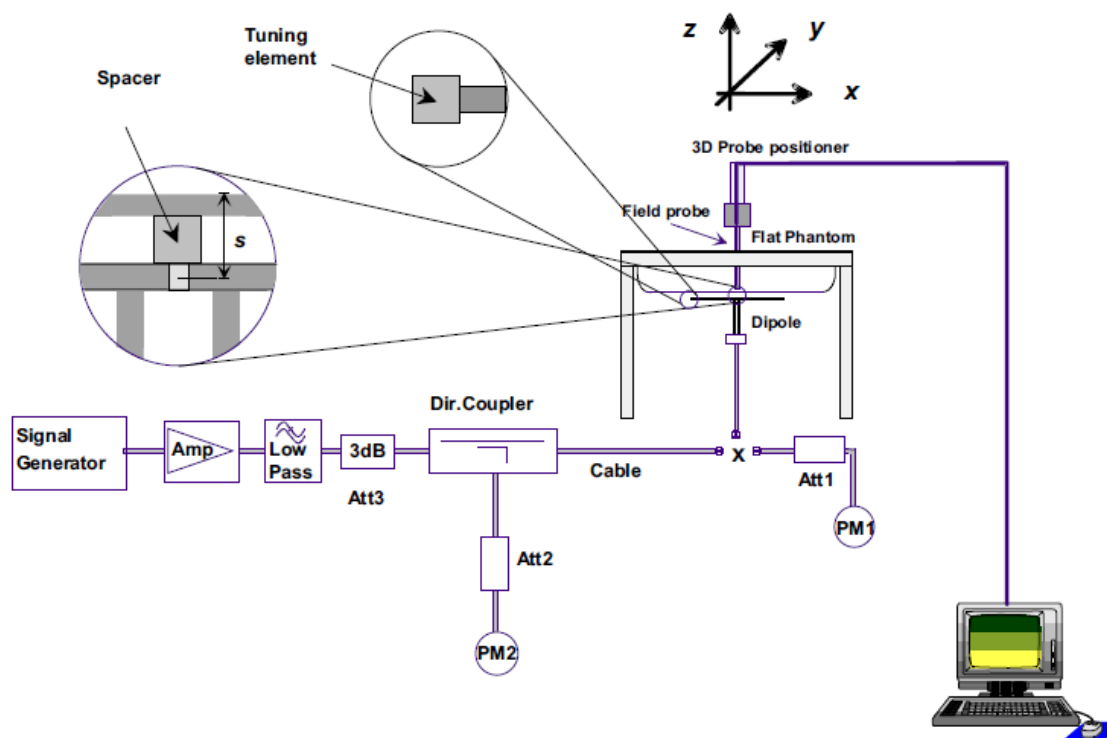
Tissue Type	Measured Frequency (MHz)	Target Tissue ($\pm 5\%$)		Measured Tissue		Liquid Temp. ($^\circ\text{C}$)	Measured Date
		ϵ_r	$\sigma(\text{S/m})$	ϵ_r	$\sigma(\text{S/m})$		
2450 Head	2450	39.2 (37.24~41.16)	1.8 (1.71~1.89)	40.179	1.803	22.1	2021/02/17

Table 4 : Measurement result of Tissue electric parameters



6.2 SAR System Check

The microwave circuit arrangement for system check is sketched in below figure. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table (A power level of 250mW (below 3GHz) or 100mW (3-6GHz) was input to the dipole antenna). During the tests, the ambient temperature of the laboratory was in the range $22\pm 2^{\circ}\text{C}$, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above $15\pm 0.5\text{ cm}$ in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



F-3. the microwave circuit arrangement used for SAR system check



6.2.1 Summary System Check Result(s)

Validation Kit		Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1W)	Measured SAR (normalized to 1W)	Target SAR (normalized to 1W) (±10%)	Target SAR (normalized to 1W) (±10%)	Liquid Temp. (°C)	Measured Date
		1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)		
D2450V2	Head	12.90	6.06	51.60	24.24	51.9 (46.71~57.09)	23.8 (21.42~26.18)	22.1	2021/02/17

Table 5 : SAR System Check Result

6.2.2 Detailed System Check Results

Please see the Appendix A



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7 Test Configuration

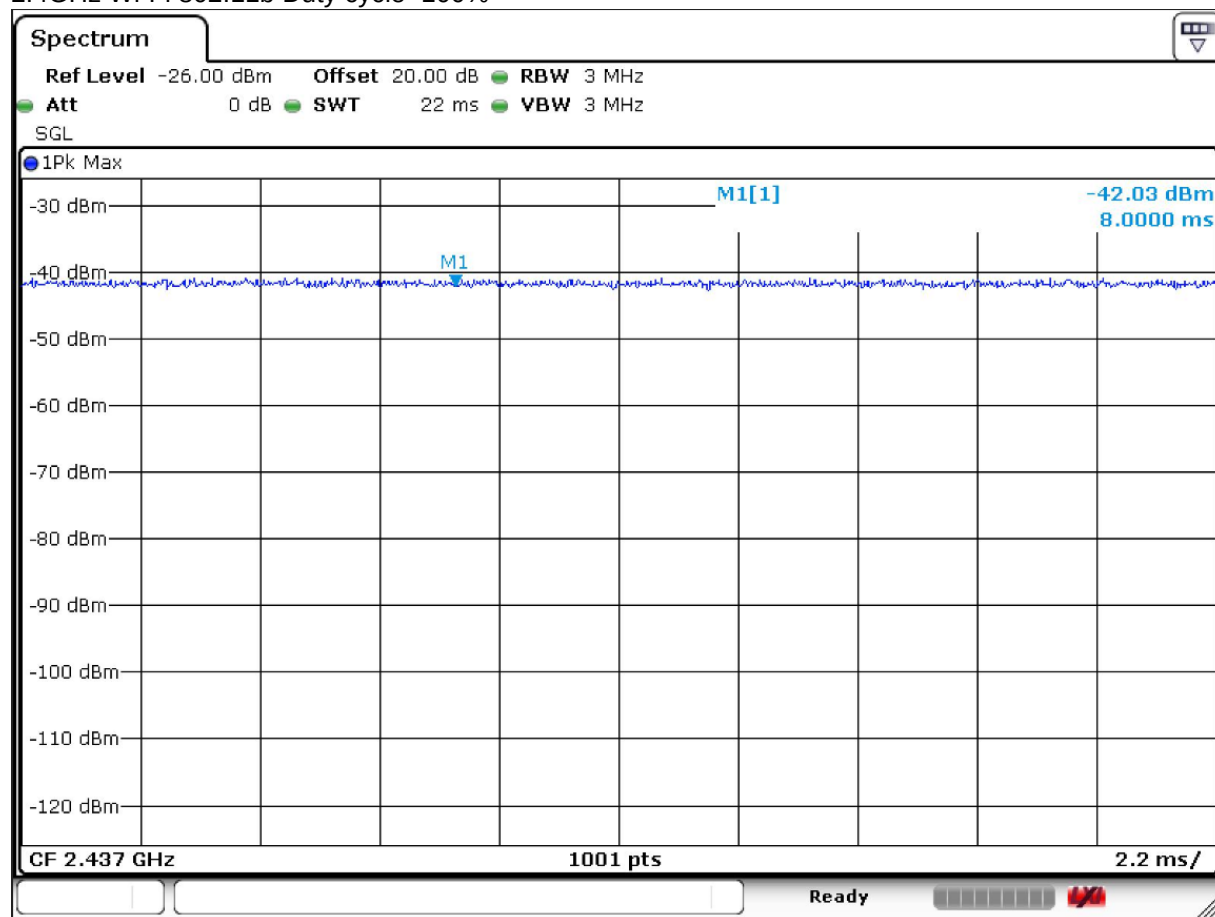
7.1 Operation Configurations

7.1.1 WiFi Test Configuration

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement.

7.1.1.1 Duty cycle

2.4GHz Wi-Fi 802.11b Duty cycle=100%





7.1.1.2 Initial Test Position SAR Test Reduction Procedure

DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures. The initial test position procedure is described in the following:

- 1) . When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band. SAR is also not required for that exposure configuration in the subsequent test configuration(s).
- 2) . When the reported SAR of the initial test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position using subsequent highest extrapolated or estimated 1-g SAR conditions determined by area scans or next closest/smallest test separation distance and maximum RF coupling test positions based on manufacturer justification, on the highest maximum output power channel, until the reported SAR is ≤ 0.8 W/kg or all required test positions (left, right, touch, tilt or subsequent surfaces and edges) are tested.
- 3) . For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested. a) Additional power measurements may be required for this step, which should be limited to those necessary for identifying the subsequent highest output power channels.

7.1.1.3 Initial Test Configuration Procedures

An initial test configuration is determined for OFDM transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. For configurations with the same specified or measured maximum output power, additional transmission mode and test channel selection procedures are required. SAR test reduction for subsequent highest output test channels is determined according to *reported* SAR of the initial test configuration. For next to the ear, hotspot mode and UMC mini-tablet exposure configurations where multiple test positions are required, the initial test position procedure is applied to minimize the number of test positions required for SAR measurement using the initial test configuration transmission mode. For fixed exposure conditions that do not have multiple SAR test positions, SAR is measured in the transmission mode determined by the initial test configuration.

When the *reported* SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until *reported* SAR is ≤ 1.2 W/kg or all required channels are tested.

7.1.1.4 Subsequent Test Configuration Procedures

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. The initial test position procedure is applied to next to the ear, UMPC mini-tablet and hotspot mode configurations. When the same maximum output power is specified for multiple transmission modes, additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. The subsequent test configuration and SAR measurement procedures are described in the following.

- 1) . When SAR test exclusion provisions of KDB Publication 447498 are applicable and SAR measurement is not required for the initial test configuration, SAR is also not required for the next highest maximum output power transmission mode subsequent test configuration(s) in that frequency band or aggregated band and exposure configuration.



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- 2) . When the highest *reported* SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.
- 3) . The number of channels in the initial test configuration and subsequent test configuration can be different due to differences in channel bandwidth. When SAR measurement is required for a subsequent test configuration and the channel bandwidth is smaller than that in the initial test configuration, all channels in the subsequent test configuration that overlap with the larger bandwidth channel tested in the initial test configuration should be used to determine the highest maximum output power channel. This step requires additional power measurement to identify the highest maximum output power channel in the subsequent test configuration to determine SAR test reduction.
 - a) SAR should first be measured for the channel with highest measured output power in the subsequent test configuration.
 - b) SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the *reported* SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is > 1.2 W/kg or until all required channels are tested. i) For channels with the same measured maximum output power, SAR should be measured using the channel closest to the center frequency of the larger channel bandwidth channel in the initial test configuration.
- 4) . SAR measurements for the remaining highest specified maximum output power OFDM transmission mode configurations that have not been tested in the initial test configuration (highest maximum output) or subsequent test configuration(s) (subsequent next highest maximum output power) is determined by recursively applying the subsequent test configuration procedures in this section to the remaining configurations according to the following:
 - a) replace "subsequent test configuration" with "next subsequent test configuration" (i.e., subsequent next highest specified maximum output power configuration)
 - b) replace "initial test configuration" with "all tested higher output power configurations"

7.1.1.5 2.4 GHz WiFi SAR Procedures

Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band to simplify DSSS test requirements. For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions. When SAR measurement is required for an OFDM configuration, the initial test configuration, subsequent test configuration and initial test position procedures are applied. The SAR test exclusion requirements for 802.11g/n OFDM configurations are described in following.

• 802.11b DSSS SAR Test Requirements

SAR is measured for 2.4 GHz 802.11b DSSS using either a fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:

- 1) . When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- 2) . When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.

• 2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements

When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied (section 5.3, including sub-sections). SAR is not required for the following 2.4 GHz OFDM conditions.

- 1) . When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
- 2) . 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.



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8 Test Result

8.1 Measurement of RF Conducted Power

8.1.1 Conducted Power of WIFI

Mode	Channel	Frequency(MHz)	Data Rate (Mbps)	Tune up	Average Power (dBm)	SAR Test
802.11b	1	2412	1	15.5	15.3	Yes
	2	2417		16.0	15.1	Yes
	6	2437		16.0	15.9	Yes
	10	2457		16.0	15.2	Yes
	11	2462		15.5	15.0	Yes
802.11g	1	2412	6	15.0	11.2	No
	6	2437		15.0	12.5	No
	11	2462		15.0	11.6	No
802.11n HT20	1	2412	6.5	15.0	11.9	No
	6	2437		15.0	11.1	No
	11	2462		15.0	11.0	No

Table 6: Conducted Power of WIFI

Note:

- a) Power must be measured at each transmit antenna port according to the DSSS and OFDM transmission configurations in each standalone and aggregated frequency band.
- b) Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units.
- 1) When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.
 - 2) When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.





8.2 Stand-alone SAR test evaluation

Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.

Freq. Band	Frequency (GHz)	Position	Average Power		Test Separation (mm)	Calculate Value	Exclusion Threshold	Exclusion (Y/N)
			dBm	mW				
Wi-Fi	2.462	Body	16	39.81	5	12.49	3	N

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

- 1) $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$ mW, for 100 MHz to 1500 MHz
- 2) $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$ mW, for > 1500 MHz and ≤ 6 GHz

1) Standalone SAR exclusion calculation (Antenna to adjacent side <50 mm)

7) Standards CEM exclusion calculation (x-antenna to adjacent class 30mm)												
Band	WIFI 2.4G antenna closed						WIFI 2.4G external antenna					
Frequency	2.462GHz											
Max Power	16dBm											
Position	Front	Back	Left	Right	Top	Bottom	Front	Back	Left	Right	Top	Bottom
Separation distances	15	5	35	35	5	78	15	5	120	35	83	78
Calculate Value	4.16	12.49	1.78	1.78	12.49	>50mm	4.16	12.49	>50mm	1.78	>50mm	>50mm
SAR Test	Yes	Yes	No	No	Yes	>50mm	Yes	Yes	>50mm	No	>50mm	>50mm

2) Standalone SAR exclusion calculation (Antenna to adjacent side >50 mm)

Band	WIFI 2.4G antenna closed						WIFI 2.4G external antenna					
Frequency	2.462GHz											
Max Power	16dBm											
Position	Front	Back	Left	Right	Top	Bottom	Front	Back	Left	Right	Top	Bottom
Separation distances	15	5	35	35	5	78	15	5	120	35	83	78
Calculate Value	<50mm	<50mm	<50mm	<50mm	<50mm	375.83	<50mm	<50mm	795.83	<50mm	425.83	375.83
SAR Test	<50mm	<50mm	<50mm	<50mm	<50mm	No	<50mm	<50mm	No	<50mm	No	No





8.3 Measurement of SAR Data

8.3.1 SAR Result of 2.4GHz WIFI

Test position	Test mode	Test Ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg) 1-g	Power drift(dB)	Conducted power (dBm)	Tune up Limit (dBm)	Scaled factor	Scaled SAR (W/kg)	SAR limit (W/kg)	Liquid Temp. (°C)
Body Test data with antenna closed (Separate 5mm)												
Front side	802.11b	6/2437	100.00%	1	0.034	-0.03	15.90	16.00	1.023	0.035	1.6	22.1
Back side	802.11b	6/2437	100.00%	1	0.285	0.06	15.90	16.00	1.023	0.292	1.6	22.1
Top side	802.11b	6/2437	100.00%	1	0.116	-0.15	15.90	16.00	1.023	0.119	1.6	22.1
Body Test data with external antenna (Separate 5mm)												
Front side	802.11b	6/2437	100.00%	1	0.162	0.03	15.90	16.00	1.023	0.166	1.6	22.1
Back side	802.11b	6/2437	100.00%	1	0.419	-0.06	15.90	16.00	1.023	0.429	1.6	22.1
Back side	802.11b	1/2412	100.00%	1	0.485	-0.09	15.30	15.50	1.047	0.508	1.6	22.1
Back side	802.11b	2/2417	100.00%	1	0.409	0.11	15.10	16.00	1.230	0.503	1.6	22.1
Back side	802.11b	10/2457	100.00%	1	0.417	-0.07	15.20	16.00	1.202	0.501	1.6	22.1
Back side	802.11b	11/2462	100.00%	1	0.261	0.08	15.00	15.50	1.122	0.293	1.6	22.1

Table 7: SAR of 2.4GHz WIFI for Body.

Note:

- 1) The maximum Scaled SAR value is marked in **bold**. Graph results refer to Appendix B
- 2) If the reported (scaled) SAR measured at the middle channel or highest output power channel for each test configuration is ≤ 0.8 W/kg then testing at the other channels is not required for such test configuration(s).
- 3) Each channel was tested at the lowest data rate.
- 4) 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, 802.11g/n OFDM SAR Test is not required.

Mode	Tune-up (dBm)	Tune-up (mw)	Max Reported SAR1-g(W/kg)	Adjusted SAR1-g(W/kg)	SAR test
802.11b	16.00	39.81	0.508	/	Yes
802.11g	15.00	31.62	/	0.404	No
802.1n 20M	15.00	31.62	/	0.404	No





9 Equipment list

Test Platform		SPEAG DASY5 Professional				
Description		SAR Test System (Frequency range 300MHz-6GHz)				
Software Reference		DASY52; SEMCAD				
Hardware Reference						
Equipment		Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	Twin Phantom	SPEAG	SAM 3	1912	NCR	NCR
☒	DAE	SPEAG	DAE4	1327	2020-10-20	2021-10-19
☒	E-Field Probe	SPEAG	EX3DV4	3793	2020-05-09	2021-05-08
☒	Validation Kits	SPEAG	D2450V2	733	2019-12-17	2022-12-16
☒	Agilent Network Analyzer	Agilent	E5071C	MY46523591	2020-04-16	2021-04-15
☒	Dielectric Probe Kit	Agilent	85070E	US01440210	NCR	NCR
☒	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR
☒	Signal Generator	Agilent	N5171B	MY53050736	2020-04-15	2021-04-14
☒	Preamplifier	Mini-Circuits	ZHL-42W	15542	NCR	NCR
☒	Power Meter	Agilent	E4416A	GB41292095	2020-04-15	2021-04-14
☒	Power Sensor	Agilent	8481H	MY41091234	2020-04-15	2021-04-14
☒	Power Sensor	R&S	NRP-Z92	100025	2020-04-16	2021-04-15
☒	Attenuator	SHX	TS2-3dB	30704	NCR	NCR
☒	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR
☒	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR
☒	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR
☒	Speed reading thermometer	MingGao	T809	NA	2020-04-21	2021-04-20
☒	Humidity and Temperature Indicator	KIMTOKA	KIMTOKA	NA	2020-04-21	2021-04-20

Note: All the equipments are within the valid period when the tests are performed.



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10 Calibration certificate

Please see the Appendix C

11 Photographs

Please see the Appendix D

Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs

---END---



Appendix A

Detailed System Check Results

1. System Performance Check
System Performance Check 2450 MHz Head

Test Laboratory: SGS-SAR Lab

System Performance Check 2450MHz Head

DUT: D2450V2; Type: D2450V2; Serial: 733

Communication System: UID 0, CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium: HSL2450; Medium parameters used: $f = 2450$ MHz; $\sigma = 1.803$ S/m; $\epsilon_r = 40.179$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY 5 Configuration:

- Probe: EX3DV4-SN 3793; ConvF(7.06, 7.06, 7.06); Calibrated: 2020-05-09;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1327; Calibrated: 2020-10-20
- Phantom: SAM 3; Type: SAM; Serial: 1912
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

Body/d=10mm, Pin=250mW/Area Scan (9x15x1): Measurement grid: dx=12mm, dy=12mm
Maximum value of SAR (measured) = 20.5 W/kg

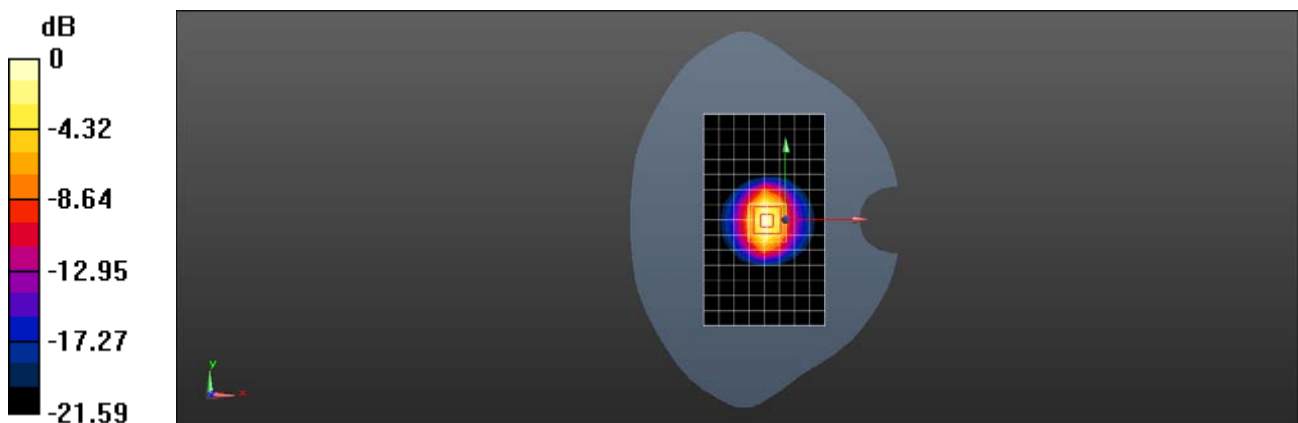
Body/d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 90.03 V/m; Power Drift = -0.01 dB

Peak SAR (extrapolated) = 25.6 W/kg

SAR(1 g) = 12.9 W/kg; SAR(10 g) = 6.06 W/kg

Maximum value of SAR (measured) = 21.1 W/kg



0 dB = 21.1 W/kg = 13.24 dBW/kg

Appendix B

Detailed Test Results

1. WIFI
WIFI 2.4G for Body

Test Laboratory: SGS-SAR Lab

VM901 WIFI 2.4G 802.11b 1CH Back side with external antenna 5mm

DUT: VM901; Type: 2.4G WIFI Baby Monitor; Serial: A1

Communication System: UID 0, WI-FI(2.4GHz) (0); Frequency: 2412 MHz; Duty Cycle: 1:1

Medium: HSL2450; Medium parameters used: $f = 2412$ MHz; $\sigma = 1.759$ S/m; $\epsilon_r = 40.247$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY 5 Configuration:

- Probe: EX3DV4-SN 3793; ConvF(7.06, 7.06, 7.06); Calibrated: 2020-05-09;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1327; Calibrated: 2020-10-20
- Phantom: SAM 3; Type: SAM; Serial: 1912
- DASY52 52.8.8(1222); SEMCAD X 14.6.10(7331)

Configuration/Body/Area Scan (11x17x1): Measurement grid: dx=12mm, dy=12mm
Maximum value of SAR (measured) = 0.832 W/kg

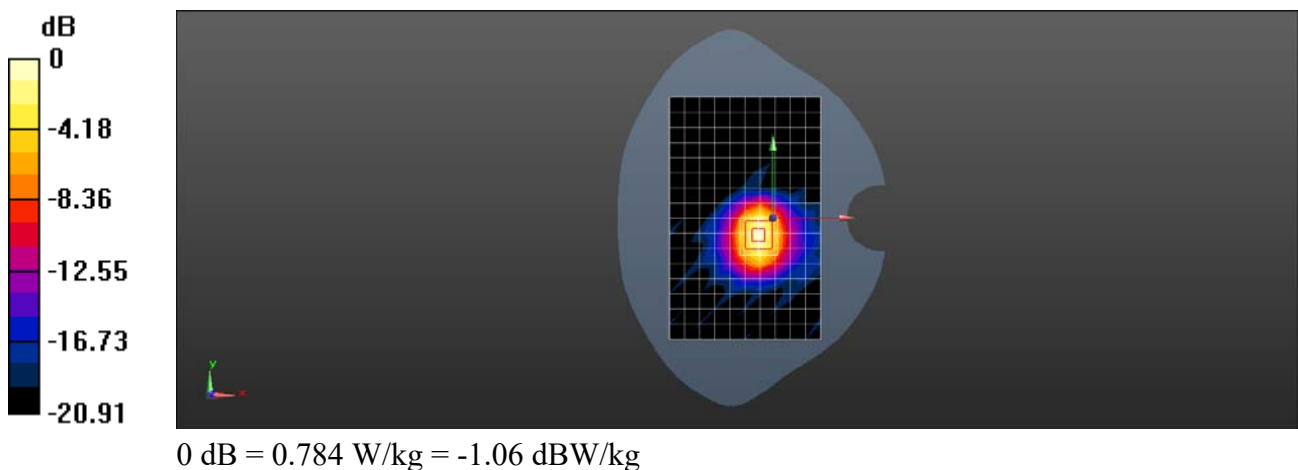
Configuration/Body/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 13.06 V/m; Power Drift = -0.09 dB

Peak SAR (extrapolated) = 0.969 W/kg

SAR(1 g) = 0.485 W/kg; SAR(10 g) = 0.233 W/kg

Maximum value of SAR (measured) = 0.784 W/kg



Appendix C

Calibration certificate

1. Dipole
D2450V2-SN 733(2019-12-17)
2. DAE
DAE4-SN 1327(2020-10-20)
3. Probe
EX3DV4-SN 3793(2020-05-09)



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Client

SGS

Certificate No: **Z19-60474**

CALIBRATION CERTIFICATE

Object

D2450V2 - SN: 733

Calibration Procedure(s)

FF-Z11-003-01

Calibration Procedures for dipole validation kits

Calibration date:

December 17, 2019

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	106276	11-Apr-19 (CTTL, No.J19X02605)	Apr-20
Power sensor NRP6A	101369	11-Apr-19 (CTTL, No.J19X02605)	Apr-20
Reference Probe EX3DV4	SN 3617	31-Jan-19(SPEAG,No.EX3-3617_Jan19)	Jan-20
DAE4	SN 1555	22-Aug-19(CTTL-SPEAG,No.Z19-60295)	Aug-20
Secondary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Signal Generator E4438C	MY49071430	23-Jan-19 (CTTL, No.J19X00336)	Jan-20
NetworkAnalyzer E5071C	MY46110673	24-Jan-19 (CTTL, No.J19X00547)	Jan-20

	Name	Function	Signature
Calibrated by:	Zhao Jing	SAR Test Engineer	
Reviewed by:	Lin Hao	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: December 23, 2019

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Glossary:

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

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices- Part 1: Device used next to the ear (Frequency range of 300MHz to 6GHz)", July 2016
- IEC 62209-2, "Procedure to measure the Specific Absorption Rate (SAR) For wireless communication devices used in close proximity to the human body (frequency range of 30MHz to 6GHz)", March 2010
- KDB865664, SAR Measurement Requirements for 100 MHz to 6 GHz

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions:** Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL:** The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss:** These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay:** One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured:** SAR measured at the stated antenna input power.
- SAR normalized:** SAR as measured, normalized to an input power of 1 W at the antenna connector.
- SAR for nominal TSL parameters:** The measured TSL parameters are used to calculate the nominal SAR result.

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



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Measurement Conditions

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

DASY Version	DASY52	V52.10.3
Extrapolation	Advanced Extrapolation	
Phantom	Triple Flat Phantom 5.1C	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	2450 MHz $\pm$ 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	39.2	1.80 mho/m
Measured Head TSL parameters	(22.0 $\pm$ 0.2) °C	39.0 $\pm$ 6 %	1.77 mho/m $\pm$ 6 %
Head TSL temperature change during test	<1.0 °C	---	---

SAR result with Head TSL

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	12.9 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	51.9 W/kg $\pm$ 18.8 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Head TSL	Condition	
SAR measured	250 mW input power	5.92 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	23.8 W/kg $\pm$ 18.7 % (k=2)



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Appendix (Additional assessments outside the scope of CNAS L0570)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	52.2Ω+ 3.88 jΩ
Return Loss	- 27.2dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.018 ns
----------------------------------	----------

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

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
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DASY5 Validation Report for Head TSL

Date: 12.17.2019

Test Laboratory: CTTL, Beijing, China

DUT: Dipole 2450 MHz; Type: D2450V2; Serial: D2450V2 - SN: 733

Communication System: UID 0, CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.772$ S/m; $\epsilon_r = 39.01$; $\rho = 1000$ kg/m³

Phantom section: Right Section

DASY5 Configuration:

- Probe: EX3DV4 - SN3617; ConvF(7.62, 7.62, 7.62) @ 2450 MHz; Calibrated: 1/31/2019
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1555; Calibrated: 8/22/2019
- Phantom: MFP_V5.1C ; Type: QD 000 P51CA; Serial: 1062
- Measurement SW: DASY52, Version 52.10 (3); SEMCAD X Version 14.6.13 (7474)

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

Reference Value = 100.5 V/m; Power Drift = -0.07 dB

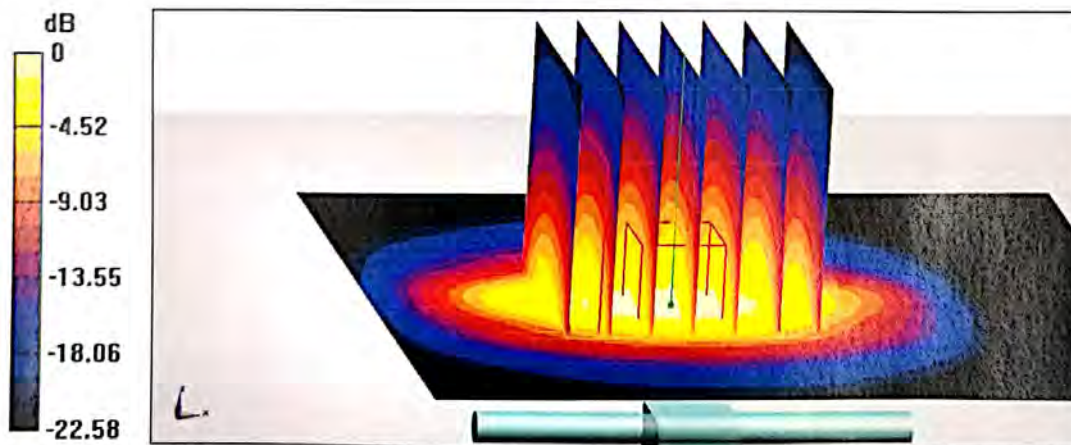
Peak SAR (extrapolated) = 27.3 W/kg

SAR(1 g) = 12.9 W/kg; SAR(10 g) = 5.92 W/kg

Smallest distance from peaks to all points 3 dB below = 9 mm

Ratio of SAR at M2 to SAR at M1 = 47.5%

Maximum value of SAR (measured) = 21.8 W/kg



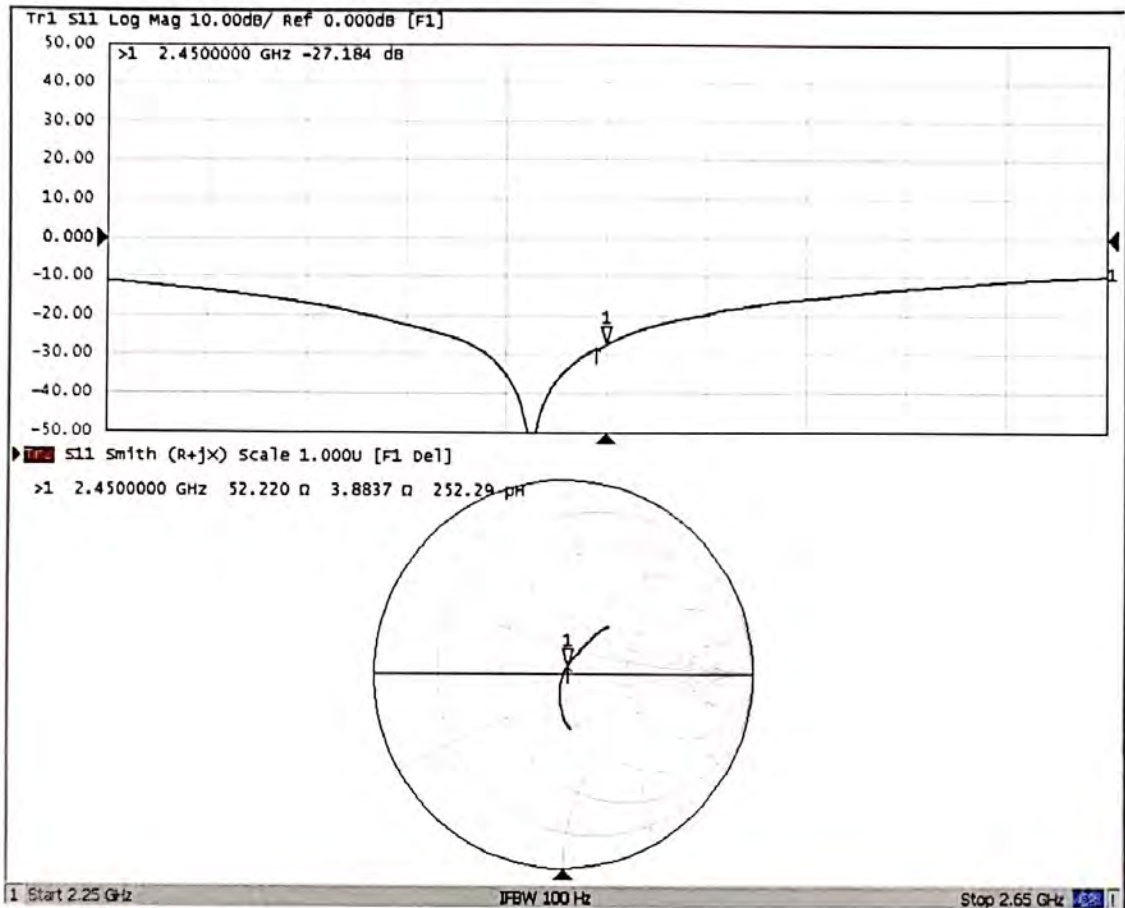
0 dB = 21.8 W/kg = 13.38 dBW/kg



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Impedance Measurement Plot for Head TSL





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Certificate No: Z20-60414

CALIBRATION CERTIFICATE

Object

DAE4 - SN: 1327

Calibration Procedure(s)

FF-Z11-002-01

Calibration Procedure for the Data Acquisition Electronics
(DAEx)

Calibration date:

October 20, 2020

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Process Calibrator 753	1971018	16-Jun-20 (CTTL, No.J20X04342)	Jun-21

	Name	Function	Signature
Calibrated by:	Yu Zongying	SAR Test Engineer	
Reviewed by:	Lin Hao	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: October 22, 2020

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Glossary:

DAE data acquisition electronics
Connector angle information used in DASY system to align probe sensor X to the robot coordinate system.

Methods Applied and Interpretation of Parameters:

- *DC Voltage Measurement:* Calibration Factor assessed for use in DASY system by comparison with a calibrated instrument traceable to national standards. The figure given corresponds to the full scale range of the voltmeter in the respective range.
- *Connector angle:* The angle of the connector is assessed measuring the angle mechanically by a tool inserted. Uncertainty is not required.
- The report provide only calibration results for DAE, it does not contain other performance test results.



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DC Voltage Measurement

A/D - Converter Resolution nominal

High Range: 1LSB = 6.1 μ V, full range = -100...+300 mV
Low Range: 1LSB = 61nV, full range = -1.....+3mV

DASY measurement parameters: Auto Zero Time: 3 sec; Measuring time: 3 sec

Calibration Factors	X	Y	Z
High Range	404.909 $\pm$ 0.15% (k=2)	404.772 $\pm$ 0.15% (k=2)	404.955 $\pm$ 0.15% (k=2)
Low Range	3.99242 $\pm$ 0.7% (k=2)	3.99109 $\pm$ 0.7% (k=2)	3.99644 $\pm$ 0.7% (k=2)

Connector Angle

Connector Angle to be used in DASY system	186.5° $\pm$ 1 °
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CNAS L0570

Client **SGS**

Certificate No: **Z20-60146**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN : 3793**

Calibration Procedure(s) **FF-Z11-004-01**
Calibration Procedures for Dosimetric E-field Probes

Calibration date: **May 09, 2020**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	101919	18-Jun-19(CTTL, No.J19X05125)	Jun-20
Power sensor NRP-Z91	101547	18-Jun-19(CTTL, No.J19X05125)	Jun-20
Power sensor NRP-Z91	101548	18-Jun-19(CTTL, No.J19X05125)	Jun-20
Reference 10dBAttenuator	18N50W-10dB	10-Feb-20(CTTL, No.J20X00525)	Feb-22
Reference 20dBAttenuator	18N50W-20dB	10-Feb-20(CTTL, No.J20X00526)	Feb-22
Reference Probe EX3DV4	SN 3617	30-Jan-20(SPEAG, No.EX3-3617_Jan20/2)	Jan-21
DAE4	SN 1556	4-Feb-20(SPEAG, No.DAE4-1556_Feb20)	Feb-21

Secondary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
SignalGenerator MG3700A	6201052605	18-Jun-19(CTTL, No.J19X05127)	Jun-20
Network Analyzer E5071C	MY46110673	10-Feb-20(CTTL, No.J20X00515)	Feb-21

	Name	Function	Signature
Calibrated by:	Yu Zongying	SAR Test Engineer	
Reviewed by:	Lin Hao	SAR Test Engineer	
Approved by:	Qi Dianyuan	SAR Project Leader	

Issued: May 11, 2020

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



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Glossary:

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConvF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A,B,C,D	modulation dependent linearization parameters
Polarization Φ	Φ rotation around probe axis
Polarization θ	θ rotation around an axis that is in the plane normal to probe axis (at measurement center), $\theta=0$ is normal to probe axis

Connector Angle information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

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



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3793

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	0.49	0.47	0.47	±10.0%
DCP(mV) ^B	101.8	104.6	103.9	

Modulation Calibration Parameters

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Unc ^E (k=2)
0	CW	X	0.0	0.0	1.0	0.00	161.2	±2.0%
		Y	0.0	0.0	1.0		154.8	
		Z	0.0	0.0	1.0		161.8	

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

^A The uncertainties of Norm X, Y, Z do not affect the E^2 -field uncertainty inside TSL (see Page 4).

^B Numerical linearization parameter: uncertainty not required.

^E Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3793

Calibration Parameter Determined in Head Tissue Simulating Media

f [MHz] ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unct. (k=2)
750	41.9	0.89	9.34	9.34	9.34	0.40	0.80	±12.1%
835	41.5	0.90	9.05	9.05	9.05	0.14	1.28	±12.1%
1750	40.1	1.37	7.81	7.81	7.81	0.24	1.04	±12.1%
1900	40.0	1.40	7.61	7.61	7.61	0.26	1.01	±12.1%
2300	39.5	1.67	7.30	7.30	7.30	0.60	0.69	±12.1%
2450	39.2	1.80	7.06	7.06	7.06	0.40	0.91	±12.1%
2600	39.0	1.96	6.88	6.88	6.88	0.50	0.80	±12.1%
3300	38.2	2.71	6.54	6.54	6.54	0.44	0.93	±13.3%
3500	37.9	2.91	6.51	6.51	6.51	0.44	0.94	±13.3%
3700	37.7	3.12	6.30	6.30	6.30	0.46	0.95	±13.3%

^C Frequency validity above 300 MHz of ±100MHz only applies for DASY v4.4 and higher (Page 2), else it is restricted to ±50MHz. The uncertainty is the RSS of ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequency below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ±10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ±5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

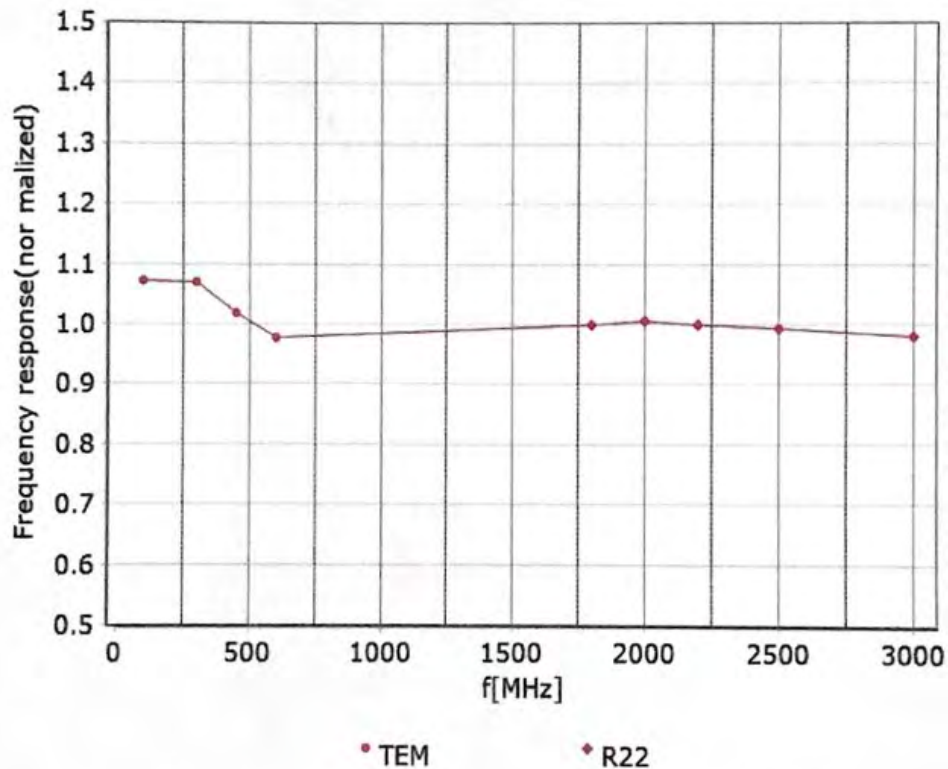
^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for the frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.



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



Uncertainty of Frequency Response of E-field: $\pm 7.4\%$ ($k=2$)



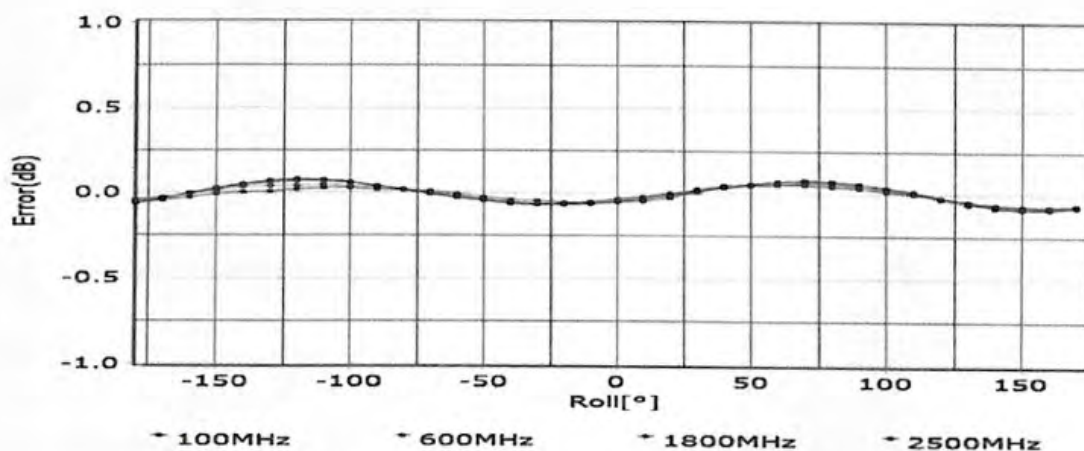
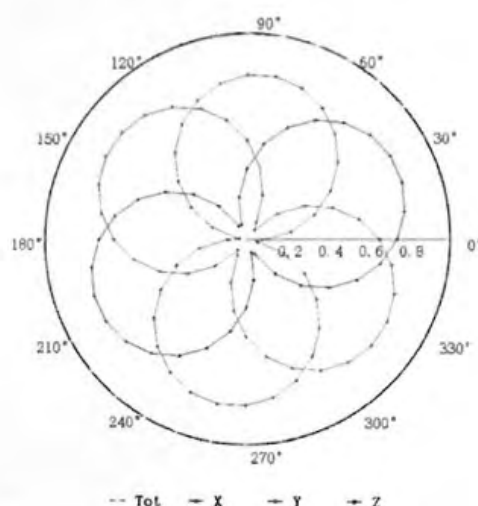
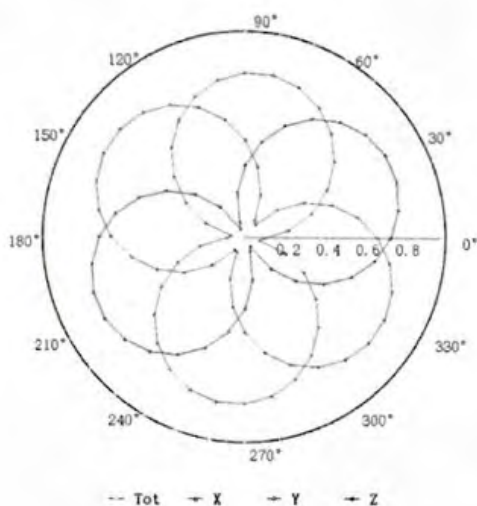
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Receiving Pattern (Φ), $\theta=0^\circ$

f=600 MHz, TEM

f=1800 MHz, R22



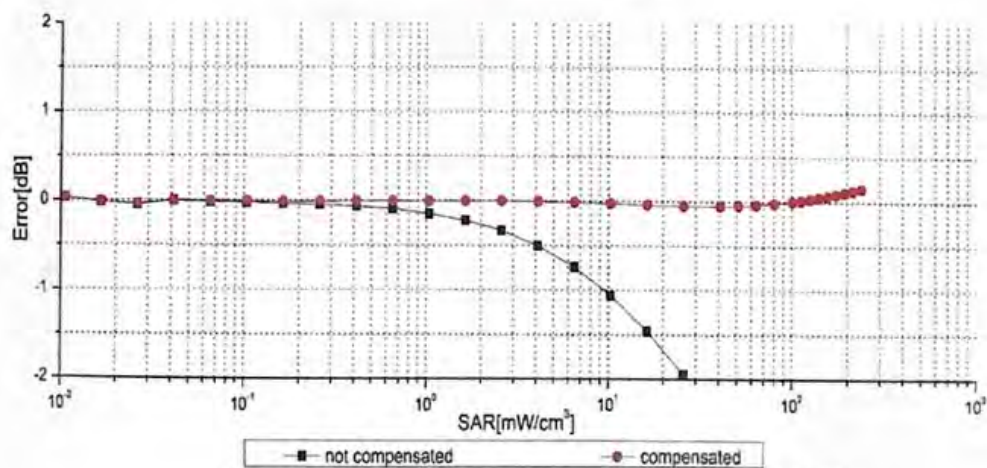
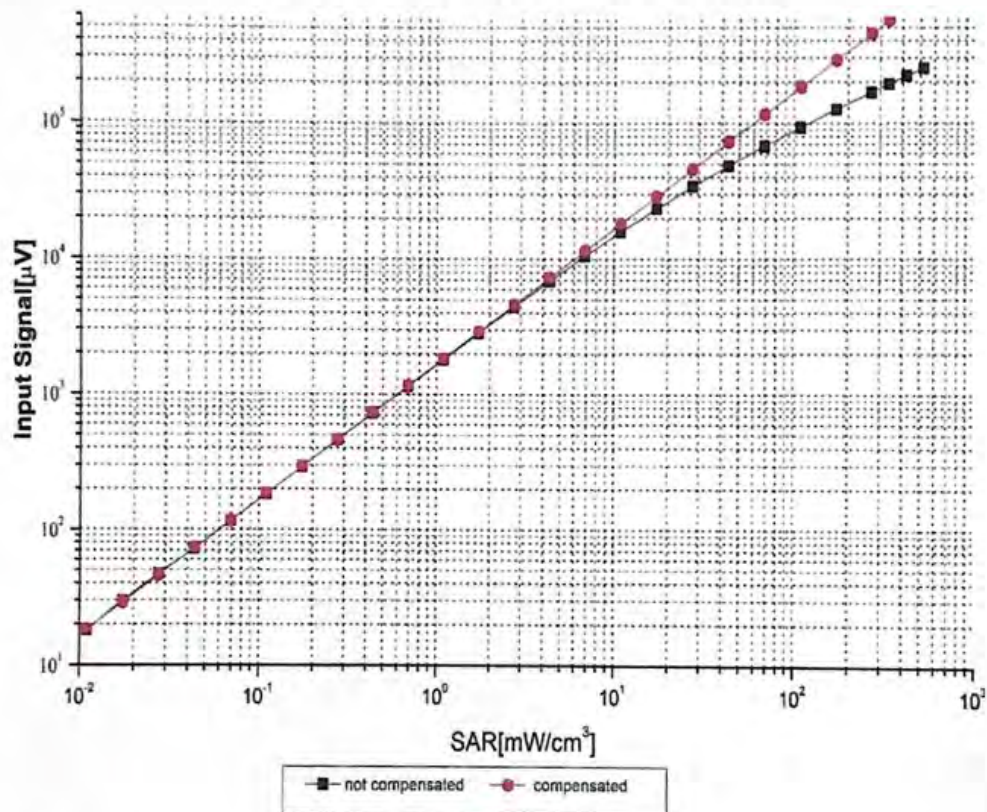
Uncertainty of Axial Isotropy Assessment: $\pm 1.2\%$ ($k=2$)



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Dynamic Range $f(\text{SAR}_{\text{head}})$ (TEM cell, $f = 900 \text{ MHz}$)



Uncertainty of Linearity Assessment: $\pm 0.9\%$ ($k=2$)



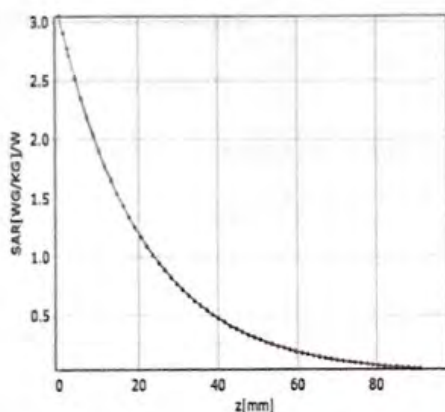
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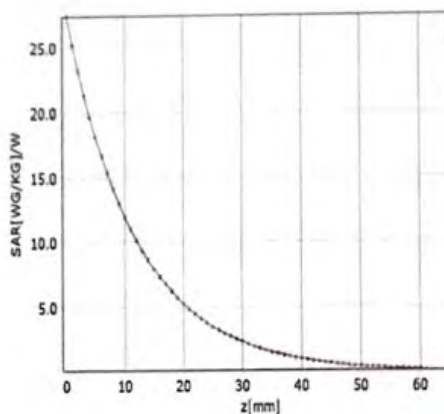
Conversion Factor Assessment

f=750 MHz,WGLS R9(H_convF)

f=1750 MHz,WGLS R22(H_convF)

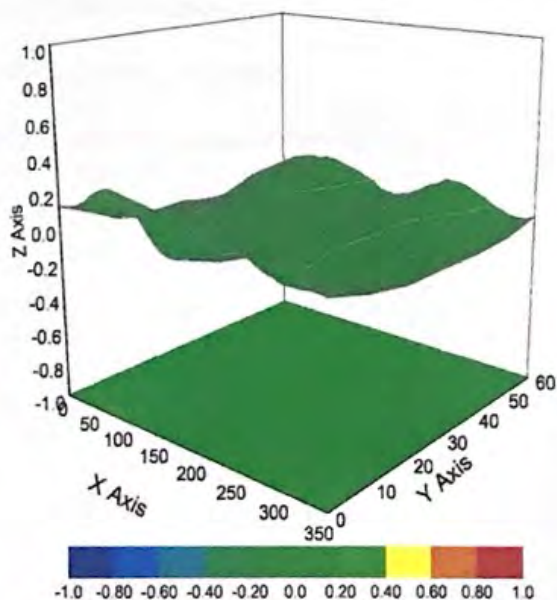


* analytical * measured



* analytical * measured

Deviation from Isotropy in Liquid



Uncertainty of Spherical Isotropy Assessment: $\pm 3.2\%$ ($k=2$)



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:3793

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	115.7
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disable
Probe Overall Length	337mm
Probe Body Diameter	10mm
Tip Length	10mm
Tip Diameter	2.5mm
Probe Tip to Sensor X Calibration Point	1mm
Probe Tip to Sensor Y Calibration Point	1mm
Probe Tip to Sensor Z Calibration Point	1mm
Recommended Measurement Distance from Surface	1.4mm

Dipole D2450V2 SN 733				
Head Liquid				
Date of Measurement	Return Loss(dB)	Δ %	Impedance (Ω)	$\Delta\Omega$
2019-12-17	-27.2	/	52.2	/
2020-12-16	-27.8	2.21%	53.4	1.2 Ω