FCC SAR EVALUATION REPORT

In accordance with the requirements of
FCC 47 CFR Part 2(2.1093) and
IEEE Std 1528-2013

Product Name：	Tablet
Trademark：	OUKITEL
Model Name：	OT9
Family Model：	OT9 S, OT9 Pro, OT9 Ultra
Report No.：	S24071803805001
FCC ID：	2ANMU-OT9

Prepared for

SHENZHEN YUNJI INTELLIGENT TECHNOLOGY CO.,LTD
A2 2F BUILDING ENET NEW INDUSTRIAL PARK, DAFU INDUSTRIAL ZONE, GUANLAN, LONGHUA,SHENZHEN CHINA

Prepared by

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TEST RESULT CERTIFICATION

Applicant's name	SHENZHEN YUNJI INTELLIGENT TECHNOLOGY CO.,LTD
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Manufacturer's Name	SHENZHEN YUNJI INTELLIGENT TECHNOLOGY CO.,LTD
Address	A2 2F BUILDING ENET NEW INDUSTRIAL PARK, DAFU INDUSTRIAL ZONE, GUANLAN, LONGHUA,SHENZHEN CHINA
Product description	
Product name.............	Tablet
Trademark	OUKITEL
Model Name	OT9
Family Model..............	OT9 S, OT9 Pro, OT9 Ultra
Standards..................	FCC 47 CFR Part 2(2.1093) IEEE Std 1528-2013 Published RF exposure KDB procedures

This device described above has been tested by Shenzhen NTEK. In accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 and KDB 865664 D01. Testing has shown that this device is capable of compliance with localized specific absorption rate (SAR) specified in FCC 47 CFR Part 2(2.1093). The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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Test Sample Number S240718038006

Date of Test

Date (s) of performance of tests... Jul. 30, 2024 ~ Aug. 07, 2024

Date of Issue .... Aug. 21, 2024

Test Result .... **Pass**

Prepared By :	Reviewed By :	Approved By :
Joe. Yan Joe Yan (Project Engineer)	Aaron Cheng Aaron Cheng (Supervisor)	Alex Li Alex Li (Manager)

※ ※ Revision History ※ ※

REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	Aug. 21, 2024	Joe Yan

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1. General Information

1.1. RF exposure limits

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

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

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

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

NOTE: ***Whole-Body SAR*** is averaged over the entire body, ***partial-body 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.

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).

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

NOTE
TRUNK LIMIT
1.6 W/kg
APPLIED TO THIS EUT

1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for OT9 are as follows.

Band	Max Reported SAR Value(W/kg) 1-g Body (Separation distance of 0mm)
WLAN 2.4G	0.285
WLAN 5.2G	0.284
WLAN 5.8G	0.786
Max Simultaneous Tx	0.953

Note: This device is in compliance with Specific Absorption Rate (SAR) for general population / uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2(2.1093), and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 & KDB 865664 D01.

1.3. EUT Description

Device Information			
Product Name	Tablet		
Trade Name	OUKITEL		
Model Name	OT9		
Family Model	OT9 S, OT9 Pro, OT9 Ultra		
Model Difference	All models are the same circuit and RF module, except for model names.		
FCC ID	2ANMU-OT9		
Device Phase	Identical Prototype		
Exposure Category	General population / Uncontrolled environment		
Antenna Type	FPCB Antenna		
Battery Information	DC 3.85V, 8000mAh, 30.8Wh		
Hardware version	W30-T606-V1.0		
Software version	V03		
Device Operating Configurations			
Supporting Mode(s)	WLAN 2.4G/5G, BT		
Test Modulation	WLAN(DSSS/OFDM), BT(GFSK, π/4-DQPSK, 8DPSK)		
Device Class	B		
Operating Frequency Range(s)	Band	Tx (MHz)	Rx (MHz)
	WLAN 2.4G	2412-2462	
	WLAN 5.2G	5180-5240	
	WLAN 5.8G	5745-5825	
	BT	2402-2480	

1.4. Test specification(s)

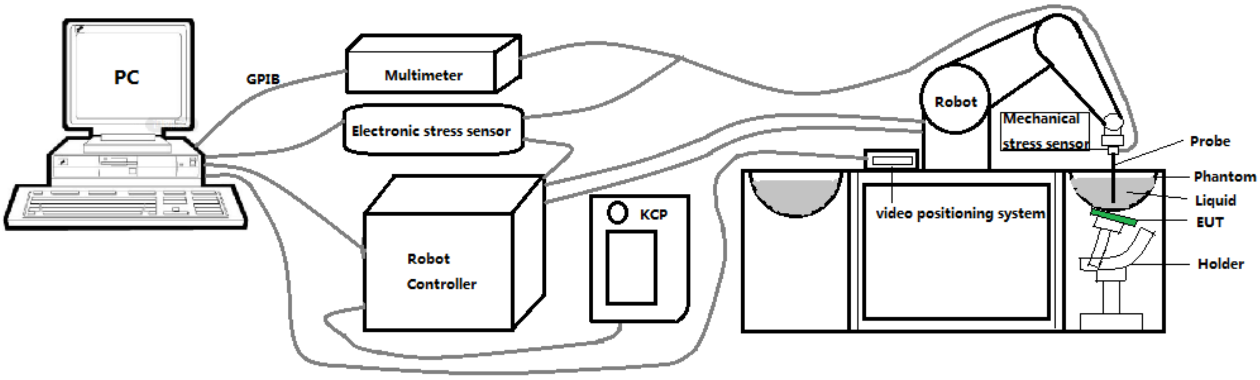
FCC 47 CFR Part 2(2.1093)
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz
KDB 865664 D02 RF Exposure Reporting
KDB 447498 D01 General RF Exposure Guidance
KDB 248227 D01 802.11 Wi-Fi SAR
KDB 616217 D04 SAR for laptop and tablets

1.5. Ambient Condition

Ambient temperature	20°C – 24°C
Relative Humidity	30% – 70%

2. SAR Measurement System

2.1. SATIMO SAR Measurement Set-up Diagram



These measurements were performed with the automated near-field scanning system OPENSAR from SATIMO. The system is based on a high precision robot (working range: 901 mm), which positions the probes with a positional repeatability of better than ±0.03 mm. The SAR measurements were conducted with dosimetric probe (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

The first step of the field measurement is the evaluation of the voltages induced on the probe by the device under test. Probe diode detectors are nonlinear. Below the diode compression point, the output voltage is proportional to the square of the applied E-field; above the diode compression point, it is linear to the applied E-field. The compression point depends on the diode, and a calibration procedure is necessary for each sensor of the probe.

The Keithley multimeter reads the voltage of each sensor and send these three values to the PC. The corresponding E field value is calculated using the probe calibration factors, which are stored in the working directory. This evaluation includes linearization of the diode characteristics. The field calculation is done separately for each sensor. Each component of the E field is displayed on the "Dipole Area Scan Interface" and the total E field is displayed on the "3D Interface"

2.2. Robot

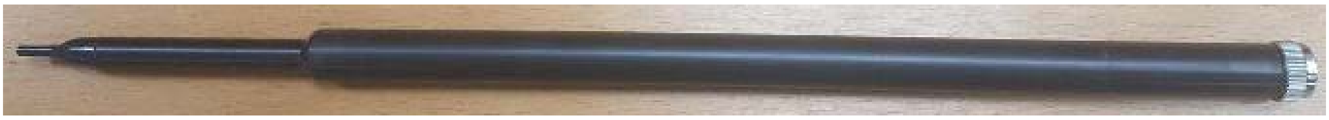
The SATIMO SAR system uses the high precision robots from KUKA. For the 6-axis controller system, the robot controller version (KUKA) from KUKA is used. The KUKA robot series have many features that are important for our application:

- High precision (repeatability ±0.03 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

2.3. E-Field Probe

This E-field detection probe is composed of three orthogonal dipoles linked to special Schottky diodes with low detection thresholds. The probe allows the measurement of electric fields in liquids such as the one defined in the IEEE and CENELEC standards.

For the measurements the Specific Dosimetric E-Field Probe 3423-EPGO-426 with following specifications is used



- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 2.5 mm
- Distance between probe tip and sensor center: 1 mm
- Distance between sensor center and the inner phantom surface: 2 mm (repeatability better than ±1 mm).
- Probe linearity: ±0.06 dB
- Axial isotropy: ±0.01 dB
- Hemispherical Isotropy: ±0.01 dB
- Calibration range: 650MHz to 5900MHz for head & body simulating liquid.
- Lower detection limit: 8mW/kg

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

2.3.1. E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than ±10%. The spherical isotropy shall be evaluated and within ±0.25dB. The sensitivity parameters (Norm X, Norm Y, and Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe are tested. The calibration data can be referred to appendix D of this report.

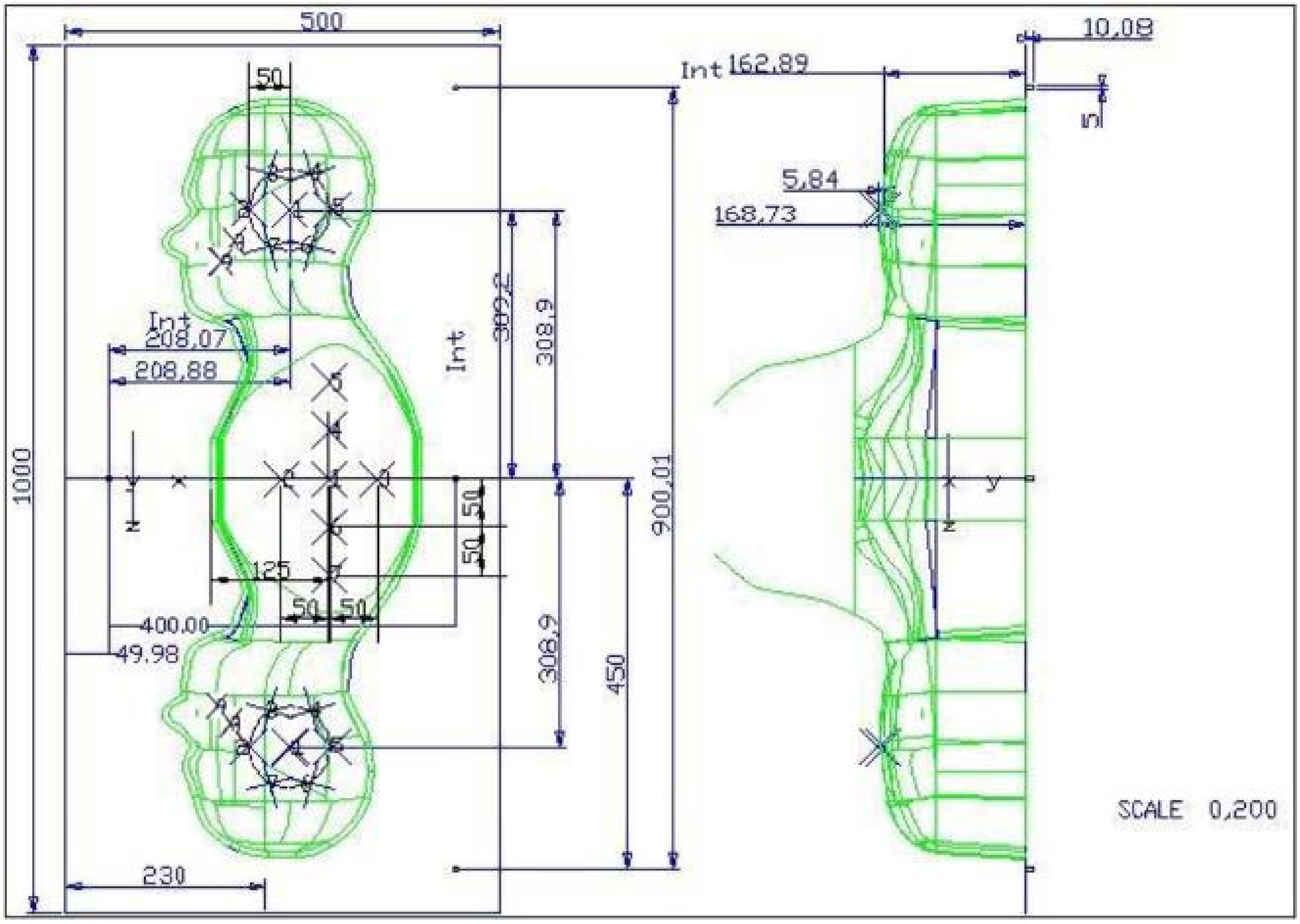
2.4. SAM phantoms

Photo of SAM phantom SN 16/15 SAM119

The SAM phantom is used to measure the SAR relative to people exposed to electro-magnetic field radiated by mobile phones.

2.4.1. Technical Data

Serial Number	Shell thickness	Filling volume	Dimensions	Positionner Material	Permittivity	Loss Tangent
SN 16/15 SAM119	2 mm ±0.2 mm	27 liters	Length:1000 mm Width:500 mm Height:200 mm	Gelcoat with fiberglass	3.4	0.02

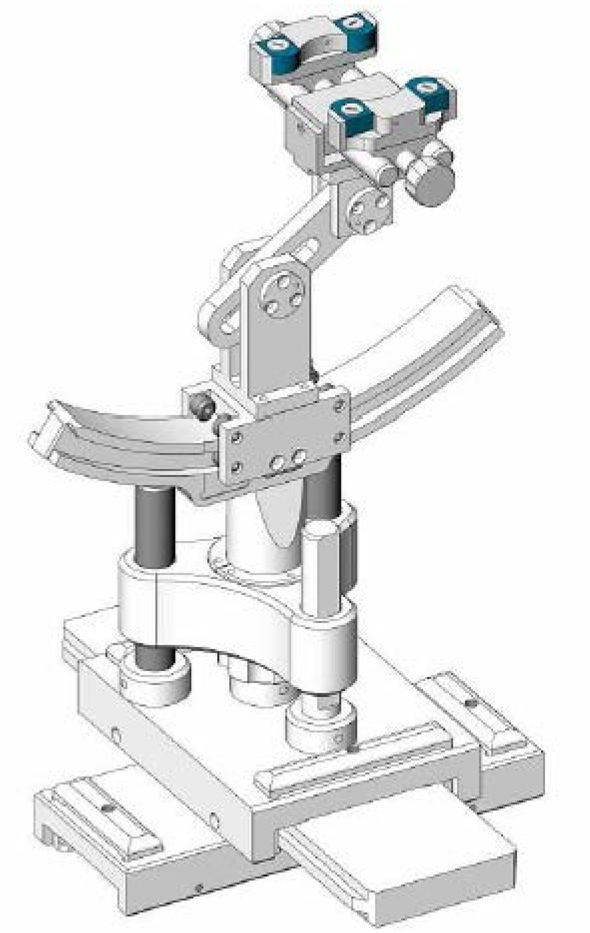


Serial Number	Left Head(mm)		Right Head(mm)		Flat Part(mm)	
SN 16/15 SAM119	2	2.02	2	2.08	1	2.09
	3	2.05	3	2.06	2	2.06
	4	2.07	4	2.07	3	2.08
	5	2.08	5	2.08	4	2.10
	6	2.05	6	2.07	5	2.10
	7	2.05	7	2.05	6	2.07
	8	2.07	8	2.06	7	2.07
	9	2.08	9	2.06	-	-

The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10 µm.

2.5. Device Holder

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



Serial Number	Holder Material	Permittivity	Loss Tangent
SN 16/15 MSH100	Delrin	3.7	0.005

2.6. Test Equipment List

This table gives a complete overview of the SAR measurement equipment.

Devices used during the test described are marked ☒

	Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
					Last Cal.	Due Date
☒	MVG	E FIELD PROBE	SSE2	3423-EPGO-426	Sep. 18, 2023	Sep. 17, 2024
☐	MVG	750 MHz Dipole	SID750	SN 03/15 DIP 0G750-355	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	835 MHz Dipole	SID835	SN 03/15 DIP 0G835-347	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	900 MHz Dipole	SID900	SN 03/15 DIP 0G900-348	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	1800 MHz Dipole	SID1800	SN 03/15 DIP 1G800-349	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	1900 MHz Dipole	SID1900	SN 03/15 DIP 1G900-350	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2000 MHz Dipole	SID2000	SN 03/15 DIP 2G000-351	Feb. 21, 2024	Feb. 20, 2027
☒	MVG	2450 MHz Dipole	SID2450	SN 03/15 DIP 2G450-352	Feb. 21, 2024	Feb. 20, 2027
☐	MVG	2600 MHz Dipole	SID2600	SN 03/15 DIP 2G600-356	Feb. 21, 2024	Feb. 20, 2027
☒	MVG	5000 MHz Dipole	SWG5500	SN 13/14 WGA 33	Feb. 21, 2024	Feb. 20, 2027
☒	MVG	Liquid measurement Kit	SCLMP	SN 21/15 OCPG 72	NCR	NCR
☒	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
☒	KEITHLEY	Millivoltmeter	2000	4072790	NCR	NCR
☐	R&S	Universal radio communication tester	CMU200	105747	Apr. 26, 2024	Apr. 25, 2025
☐	R&S	Wideband radio communication tester	CMW500	103917	Apr. 26, 2024	Apr. 25, 2025
☒	HP	Network Analyzer	8753D	3410J01136	Apr. 26, 2024	Apr. 25, 2025
☒	Agilent	MXG Vector	N5182A	MY47070317	Apr. 25,	Apr. 24,

		Signal Generator			2024	2025
☒	Agilent	Power meter	E4419B	MY45102538	Apr. 25, 2024	Apr. 24, 2025
☒	Agilent	Power sensor	E9301A	MY41495644	Apr. 25, 2024	Apr. 24, 2025
☒	Agilent	Power sensor	E9301A	US39212148	Apr. 25, 2024	Apr. 24, 2025
☒	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Apr. 26, 2024	Apr. 25, 2024
☒	N/A	Thermometer	N/A	LES-085	Mar. 27, 2023	Mar. 26, 2026
☒	MVG	SAM Phantom	SSM2	SN 16/15 SAM119	NCR	NCR
☒	MVG	Device Holder	SMPPD	SN 16/15 MSH100	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 2450	Head 2450	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 5200	Head 5200	NCR	NCR
☒	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 5800	Head 5800	NCR	NCR

Measurement Software

Manufacturer	Software Name	Software Version
SATIMO	OpenSAR	V4_02_31

3. SAR Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.

(b) Read the WWAN RF power level from the base station simulator.

(c) For WLAN/Bluetooth power measurement, use engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power in each supported wireless interface and frequency band.

(d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/Bluetooth output power.

<SAR measurement>

(a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power, in the highest power channel.

(b) Place the EUT in the positions as Appendix A demonstrates.

(c) Set scan area, grid size and other setting on the OPENSAR software.

(d) Measure SAR results for the highest power channel on each testing position.

(e) Find out the largest SAR result on these testing positions of each band.

(f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

(a) Power reference measurement

(b) Area scan

(c) Zoom scan

(d) Power drift measurement

3.1. Power Reference

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

3.2. Area scan & Zoom scan

The area scan is a 2D scan to find the hot spot location on the DUT. The zoom scan is a 3D scan above the hot spot to calculate the 1g and 10g SAR value.

Measurement of the SAR distribution with a grid of 8 to 16 mm * 8 to 16 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.

From the scanned SAR distribution, identify the position of the maximum SAR value, in addition identify the positions of any local maxima with SAR values within 2 dB of the maximum value that will not be within the zoom scan of other peaks; additional peaks shall be measured only when the primary peak is within 2 dB of the SAR compliance limit (e.g., 1 W/kg for 1,6 W/kg 1 g limit, or 1,26 W/kg for 2 W/kg, 10 g limit).

Area scan & Zoom scan scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

<table>
<tr><th colspan="3"></th><th>$\leq$ 3 GHz</th><th>> 3 GHz</th></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5 ± 1 mm</td><td>½·δ·ln(2) ± 0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30° ± 1°</td><td>20° ± 1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}</td><td>$\leq$ 2 GHz: $\leq$ 15 mm
2 – 3 GHz: $\leq$ 12 mm</td><td>3 – 4 GHz: $\leq$ 12 mm
4 – 6 GHz: $\leq$ 10 mm</td></tr>
<tr><td colspan="2">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.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}</td><td>$\leq$ 2 GHz: $\leq$ 8 mm
2 – 3 GHz: $\leq$ 5 mm*</td><td>3 – 4 GHz: $\leq$ 5 mm*
4 – 6 GHz: $\leq$ 4 mm*</td></tr>
<tr><td rowspan="3">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2">uniform grid: $\Delta z_{Zoom}(n)$</td><td>$\leq$ 5 mm</td><td>3 – 4 GHz: $\leq$ 4 mm
4 – 5 GHz: $\leq$ 3 mm
5 – 6 GHz: $\leq$ 2 mm</td></tr>
<tr><td rowspan="2">graded grid</td><td>$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface</td><td>$\leq$ 4 mm</td><td>3 – 4 GHz: $\leq$ 3 mm
4 – 5 GHz: $\leq$ 2.5 mm
5 – 6 GHz: $\leq$ 2 mm</td></tr>
<tr><td>$\Delta z_{Zoom}(n>1)$: between subsequent points</td><td colspan="2">$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$</td></tr>
<tr><td>Minimum zoom scan volume</td><td colspan="2">x, y, z</td><td>$\geq$ 30 mm</td><td>3 – 4 GHz: $\geq$ 28 mm
4 – 5 GHz: $\geq$ 25 mm
5 – 6 GHz: $\geq$ 22 mm</td></tr>
<tr><td colspan="5">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 area scan based 1-g SAR estimation procedures of KDB 447498 is $\leq$ 1.4 W/kg, $\leq$ 8 mm, $\leq$ 7 mm and $\leq$ 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.</td></tr>
</table>

3.3. Description of interpolation/extrapolation scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimise measurements errors, but the highest local SAR will occur at the surface of the phantom.
An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1 mm step.
The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

3.4. Volumetric Scan

The volumetric scan consists to a full 3D scan over a specific area. This 3D scan is useful form multi Tx SAR measurement. Indeed, it is possible with OpenSAR to add, point by point, several volumetric scan to calculate the SAR value of the combined measurement as it is define in the standard IEEE1528 and IEC62209.

3.5. Power Drift

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In OpenSAR measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in V/m. If the power drifts more than ±5%, the SAR will be retested.

4. System Verification Procedure

4.1. Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients (% of weight)	Head Tissue									
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	34.40	34.40	34.40	55.36	55.36	57.87	57.87	57.87	65.53	65.53
NaCl	0.79	0.79	0.79	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	64.81	64.81	64.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23
Ingredients (% of weight)	Body Tissue									
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	50.30	50.30	50.30	69.91	69.91	71.88	71.88	71.88	79.54	79.54
NaCl	0.60	0.60	0.60	0.13	0.13	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	49.10	49.10	49.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	9.99	9.99	19.97	19.97	19.97	11.24	11.24
DGBE	0.00	0.00	0.00	19.97	19.97	7.99	7.99	7.99	9.22	9.22

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid depth from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm.

Photo of Liquid depth for Head Position	Photo of Liquid depth for Body Position
	

4.1.1. Tissue Dielectric Parameter Check Results

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectric parameter are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within ±5% of the target values.

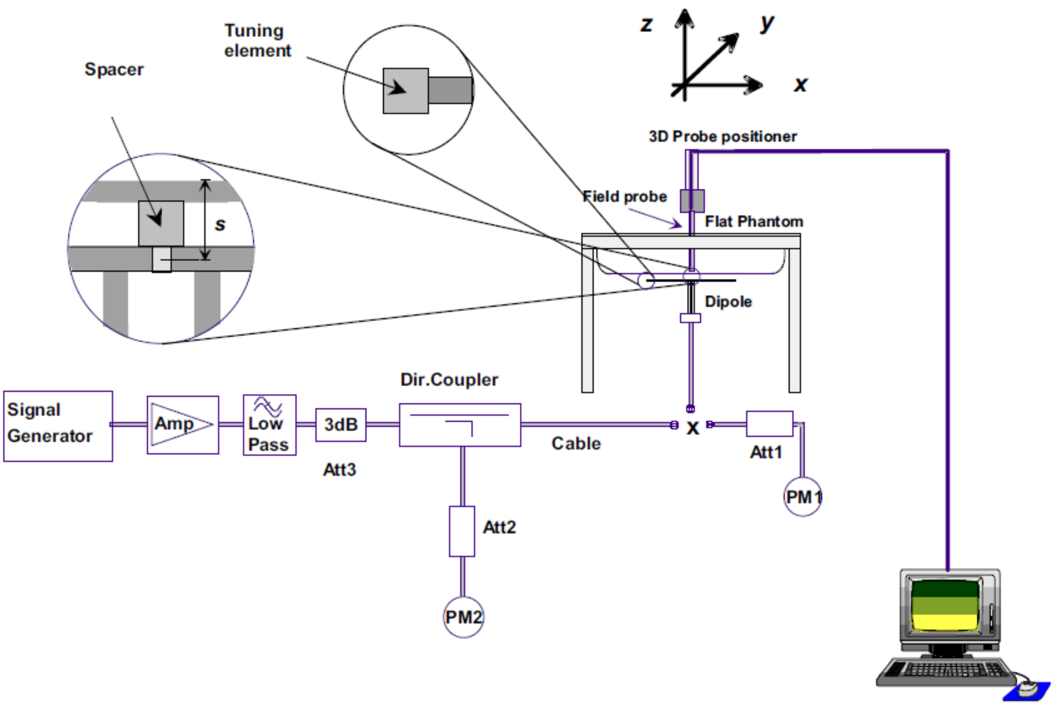
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue		Liquid Temp.	Test Date
		εr (±5%)	σ (S/m) (±5%)	εr	σ (S/m)		
Head 2450	2450	39.20 (37.24~41.16)	1.80 (1.71~1.89)	37.91	1.79	21.7 °C	Aug. 07, 2024
Head 5200	5200	36.00 (34.20~37.80)	4.66 (4.43~4.89)	34.48	4.50	21.4 °C	Jul. 30, 2024
Head 5800	5800	35.30 (33.54~37.07)	5.27 (5.01~5.53)	33.91	5.14	21.2 °C	Jul. 31, 2024

NOTE: The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.

4.2. System Verification Procedure

The system verification is performed for verifying the accuracy of the complete measurement system and performance of the software. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 100mW (below 5GHz) or 100mW (above 5GHz). To adjust this power a power meter is used. The power sensor is connected to the cable before the system verification to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system verification to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test (result on plot).

The system verification is shown as below picture:



4.2.1. System Verification Results

Comparing to the original SAR value provided by SATIMO, the verification data should be within its specification of ±10%. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance verification can meet the variation criterion and the plots can be referred to Appendix B of this report.

System Verification	Target SAR (1W) (±10%)		Measured SAR (Normalized to 1W)		Liquid Temp.	Test Date
	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)		
2450MHz	50.05 (45.05~55.06)	23.80 (21.42~26.18)	50.72	23.91	21.7 °C	Aug. 07, 2024
5200MHz	162.59 (146.33~178.85)	56.21 (50.59~61.83)	170.42	60.50	21.4 °C	Jul. 30, 2024
5800MHz	182.20 (163.98~200.42)	61.32 (55.19~67.45)	188.28	55.25	21.2 °C	Jul. 31, 2024

5. SAR Measurement variability and uncertainty

5.1. SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz, 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 (~ 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.

5.2. 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.

6. RF Exposure Positions

6.1. Tablet PC host platform exposure conditions

Refer to KDB616217 D04, when the modular approach is used, transmitters and modules must be initially tested for standalone operations in generic host conditions according to the following minimum test separation distance and antenna installation requirements for incorporation in the tablet platform. The separation distance required for incorporation in qualified hosts is described in KDB 447498; item 5) of section 4.1 and item 1) of section 5.2.2 etc.

- ≤ 5 mm between the antenna and user for both back surface and edge exposure conditions
- the antennas used by the host must have been tested for equipment approval or qualify for SAR test exclusion
- the antenna polarization, physical orientation, rotation and installation configurations used by the host must have been tested for compliance or qualify for test exclusion
- when the *SAR Test Exclusion Threshold* in KDB 447498 applies, a *test separation distance* of 5 mm is required to determine test exclusion for the tablet platform

The antennas embedded in tablets are typically ≤ 5mm from the outer housing. The required antenna to user test separation distance is a “not to exceed test” distance required to apply the modular approach. Instead of the typical zero gap tablet edge test requirement between the edge of a tablet and the user, when an antenna has been tested at ≤ 5 mm according to the modular approach it can be incorporated into tablets with at least twice the tested distance from the outer housing of the tablet edge; otherwise, the tablet edge zero gap test requirement applies. When the dedicated host approach is applied, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom.

7. RF Output Power

7.1. WLAN & Bluetooth Output Power

7.1.1. Output Power Results Of WLAN

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)
802.11b	1	2412	15.50	15.45
	6	2437	15.50	14.83
	11	2462	15.50	14.52
802.11g	1	2412	15.50	14.98
	6	2437	15.50	15.35
	11	2462	15.50	15.25
802.11n HT20	1	2412	15.50	15.15
	6	2437	15.50	15.39
	11	2462	15.50	15.20
802.11n HT40	3	2422	15.50	14.72
	6	2437	15.50	15.41
	9	2452	15.50	15.10

NOTE: Power measurement results of WLAN 2.4G.

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)
802.11a	36	5180	13.00	12.07
	40	5200	13.00	12.20
	48	5240	13.00	12.50
802.11n HT20	36	5180	12.50	11.86
	40	5200	12.50	12.12
	48	5240	12.50	12.41
802.11n HT40	38	5190	13.00	12.47
	46	5230	13.00	12.79
802.11ac VHT20	36	5180	12.50	12.07
	40	5200	12.50	12.26
	48	5240	12.50	12.42
802.11ac VHT40	38	5190	13.00	12.48
	46	5230	13.00	12.75
802.11ac VHT80	42	5210	13.00	12.50

NOTE: Power measurement results of WLAN 5.2G.

Mode	Channel	Frequency (MHz)	Tune-up (dBm)	Output Power (dBm)
802.11a	149	5745	13.00	11.94
	157	5785	13.00	11.84
	165	5825	13.00	11.97
802.11n HT20	149	5745	13.00	11.84
	157	5785	13.00	11.92
	165	5825	13.00	11.89
802.11n HT40	151	5755	13.00	12.09
	159	5795	13.00	12.66
802.11ac VHT20	149	5745	13.00	11.92
	157	5785	13.00	11.94
	165	5825	13.00	12.00
802.11ac VHT40	151	5755	13.00	12.15
	159	5795	13.00	12.68
802.11ac VHT80	155	5775	13.00	12.24

NOTE: Power measurement results of WLAN 5.8G.

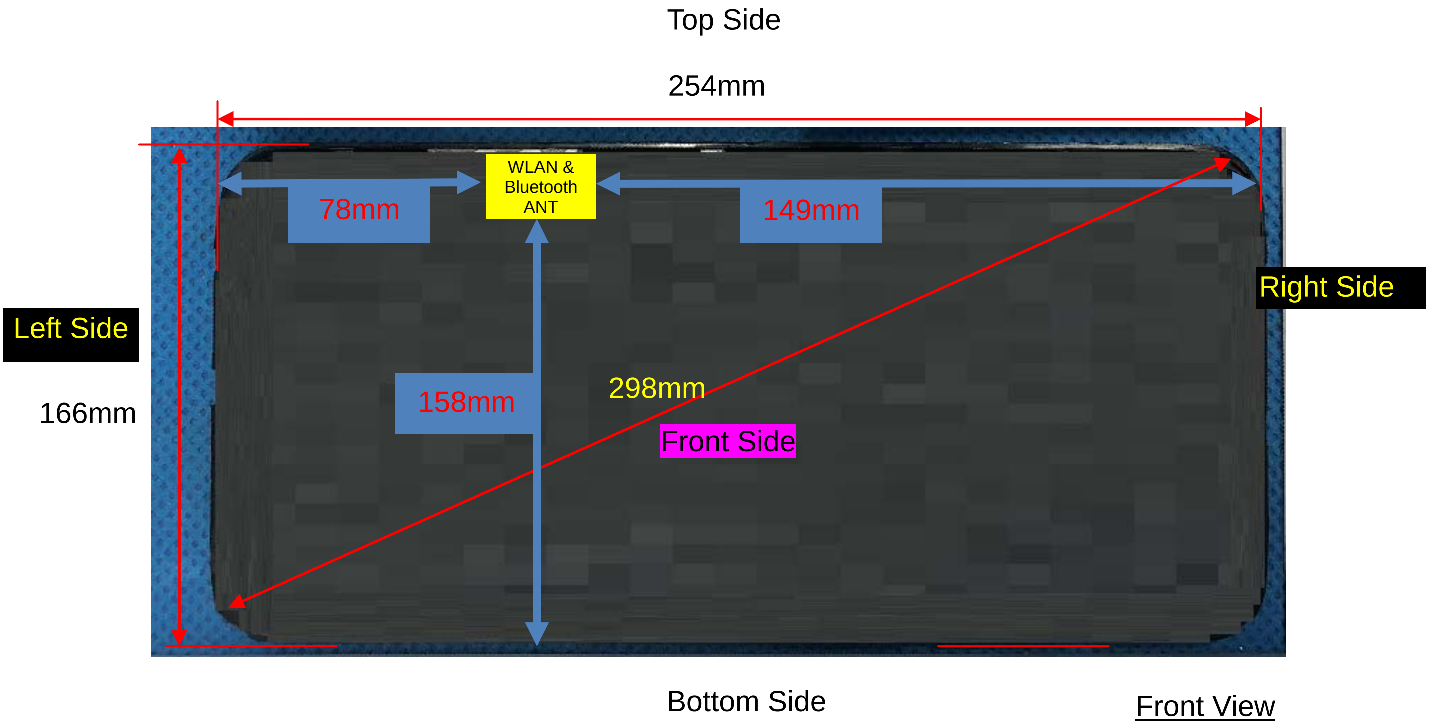
7.1.2. Output Power Results Of BT

BR+EDR	Output Power (dBm)				
	Channel	Tune-up (dBm)	Data Rates		
			1M	2M	3M
	0CH	5.00	3.26	4.03	3.66
	39CH	6.00	4.62	5.62	5.48
	78CH	5.00	4.22	4.84	4.68

BLE	Channel	Tune-up	Output Power (dBm)	
			1M	2M
	0CH	1.00	-0.50	-0.65
	19CH	1.50	1.26	1.07
	39CH	1.50	0.87	0.70

NOTE: Power measurement results of BT.

8. Antenna Location



Note: Since the confidentiality request of EUT，the antenna location example diagram see as above.

Distance of the Antenna to the EUT surface/edge						
Antennas	Front Side	Back Side	Left Side	Right Side	Top Side	Bottom Side
WLAN & BT	5	5	78	149	5	158

Note: When the minimum separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Positions for SAR tests		
Test separation distances ≤ 50 mm		
Exposure Positions	Tune-up Maximum power of WLAN 2.4G 15.50 dBm	
Front Side	Antenna to user(mm)	5
	SAR exclusion threshold	10
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold	10
	SAR testing required?	YES
Top Side	Antenna to user(mm)	5
	SAR exclusion threshold	10
	SAR testing required?	YES
Exposure Positions	Tune-up Maximum power of WLAN 5.2G 13.00 dBm	

Front Side	Antenna to user(mm)	5
	SAR exclusion threshold	8.45
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold	8.45
	SAR testing required?	YES
Top Side	Antenna to user(mm)	5
	SAR exclusion threshold	8.45
	SAR testing required?	YES
Exposure Positions	Tune-up Maximum power of WLAN 5.8G	
	13.00 dBm	
Front Side	Antenna to user(mm)	5
	SAR exclusion threshold	7.78
	SAR testing required?	YES
Back Side	Antenna to user(mm)	5
	SAR exclusion threshold	7.78
	SAR testing required?	YES
Top Side	Antenna to user(mm)	5
	SAR exclusion threshold	7.78
	SAR testing required?	YES

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

Positions for SAR tests		
Test separation distances > 50 mm		
Exposure Positions	Tune-up Maximum power of WLAN 2.4G	
	15.50 dBm	35.48 mW
Left Side	Antenna to user(mm)	78
	SAR exclusion threshold(mW)	296
	SAR testing required?	NO
Right Side	Antenna to user(mm)	149
	SAR exclusion threshold(mW)	996
	SAR testing required?	NO
Bottom Side	Antenna to user(mm)	158
	SAR exclusion threshold(mW)	1096
	SAR testing required?	NO
Exposure Positions	Tune-up Maximum power of WLAN 5.2G	
	13.00 dBm	19.95 mW
Left Side	Antenna to user(mm)	78
	SAR exclusion threshold(mW)	266
	SAR testing required?	NO
Right Side	Antenna to user(mm)	149

	SAR exclusion threshold(mW)	966
	SAR testing required?	NO
Bottom Side	Antenna to user(mm)	158
	SAR exclusion threshold(mW)	1066
	SAR testing required?	NO
Exposure Positions	Tune-up Maximum power of WLAN 5.8G	
	13.00 dBm	19.95 mW
Left Side	Antenna to user(mm)	78
	SAR exclusion threshold(mW)	262
	SAR testing required?	NO
Right Side	Antenna to user(mm)	149
	SAR exclusion threshold(mW)	962
	SAR testing required?	NO
Bottom Side	Antenna to user(mm)	158
	SAR exclusion threshold(mW)	1062
	SAR testing required?	NO

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

9. Stand-alone SAR test exclusion

Refer to FCC KDB 447498D01, the 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

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

- $f_{(GHZ)}$ 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

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Mode	P_{max} (dBm)	P_{max} (mW)	Distance (mm)	f (GHz)	Calculation Result	SAR Exclusion threshold	SAR test exclusion
BT	6.00	3.98	5	2.480	1.25	3	Yes

NOTE: Standalone SAR test exclusion for BT

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:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] * [$\sqrt{f_{(GHZ)}}$/x] W/kg for test separation distances ≤ 50mm, where x = 7.5 for 1-g SAR and x = 18.75 for 10-g SAR.

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Mode	Position	P_{max} (dBm)	P_{max} (mW)	Distance (mm)	f (GHz)	x	Estimated SAR (W/Kg)
BT	Body	6.00	3.98	5	2.48	7.5	0.167

NOTE: Estimated SAR calculation for BT

10. SAR Results

10.1. SAR measurement results

10.1.1. SAR measurement Result of WLAN 2.4G

Test Position of Body with 0mm	Test channel /Freq.	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date	Plot
			1-g	10-g						
Front Side	6/2437	802.11b	0.174	0.071	2.25	14.83	15.50	0.203	2024/8/07	

Back Side	6/2437	802.11b	0.244	0.102	-3.70	14.83	15.50	0.285	2024/8/07	3#
Top Side	6/2437	802.11b	0.189	0.076	-3.42	14.83	15.50	0.221	2024/8/07	

NOTE: Body SAR test results of WLAN 2.4G

10.1.2. SAR measurement Result of WLAN 5.2G

Test Position of Body with 0mm	Test channel /Freq	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date	Plot
			1-g	10-g						
Front Side	40/5200	802.11a	0.156	0.058	0.07	12.20	13.00	0.188	2024/7/30	
Back Side	40/5200	802.11a	0.236	0.092	4.26	12.20	13.00	0.284	2024/7/30	1#
Top Side	40/5200	802.11a	0.196	0.076	-3.46	12.20	13.00	0.236	2024/7/30	

NOTE: Body SAR test results of WLAN 5.2G

10.1.3. SAR measurement Result of WLAN 5.8G

Test Position of Body with 0mm	Test channel /Freq	Mode	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date	Plot
			1-g	10-g						
Front Side	157/5785	802.11a	0.414	0.140	0.43	11.84	13.00	0.541	2024/7/31	
Back Side	157/5785	802.11a	0.602	0.220	1.88	11.84	13.00	0.786	2024/7/31	2#
Top Side	157/5785	802.11a	0.476	0.158	-2.08	11.84	13.00	0.622	2024/7/31	

NOTE: Body SAR test results of WLAN 5.8G

10.2. Simultaneous Transmission Analysis

Per KDB 447498 D01, simultaneous transmission SAR is compliant if,

1) Scalar SAR summation < 1.6W/kg.

2) SPLSR = $(SAR_1 + SAR_2)^{1.5}$ / (min. separation distance, mm), and the peak separation distance is determined from the square root of $[(x_1-x_2)^2 + (y_1-y_2)^2 + (z_1-z_2)^2]$, where (x_1, y_1, z_1) and (x_2, y_2, z_2) are the coordinates of the extrapolated peak SAR locations in the zoom scan. If SPLSR ≤ 0.04, simultaneously transmission SAR measurement is not necessary.

Test Position		Scaled SAR_{MAX}		Σ1-g SAR (W/Kg)	SPLSR	Remark
		NII	DSS			
Body	Front Side	0.541	0.167	0.708	N/A	N/A
	Back Side	0.786	0.167	0.953	N/A	N/A
	Left Side	/	/	/	N/A	N/A
	Right Side	/	/	/	N/A	N/A
	Top Side	0.622	0.167	0.789	N/A	N/A

	Bottom Side	/	/	/	N/A	N/A

1. NO simultaneous transmissions are possible for this device of BT and 2.4G Wi-Fi.
2. NO simultaneous transmissions are possible for this device of 2.4G Wi-Fi and 5G Wi-Fi.

11. Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR

12. Appendix B. System Check Plots

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MEASUREMENT 1

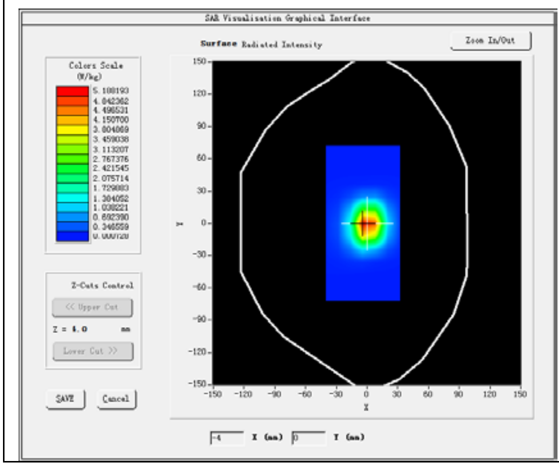
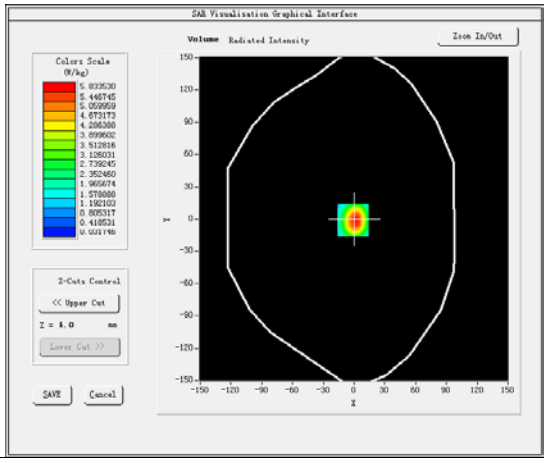
Date of measurement: 7/8/2024

A. Experimental conditions.

Area Scan	dx=12mm dy=12mm, h= 5.00 mm
ZoomScan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW2450
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.85

B. SAR Measurement Results

Frequency (MHz)	2450.000000
Relative permittivity (real part)	37.910986
Relative permittivity (imaginary part)	13.158279
Conductivity (S/m)	1.790988
Variation (%)	-3.640000

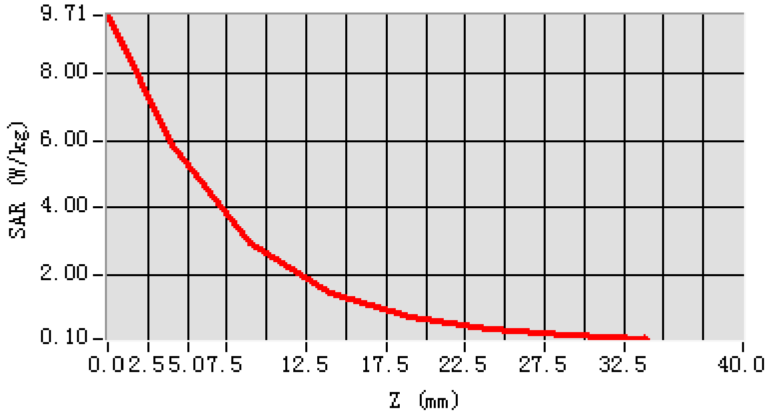
SURFACE SAR	VOLUME SAR
	

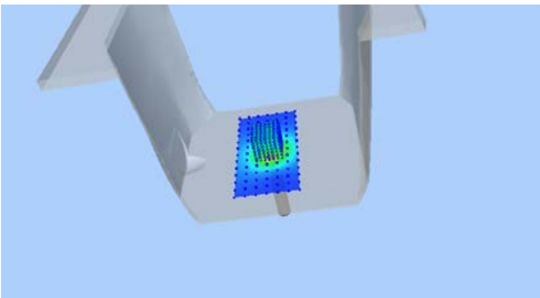
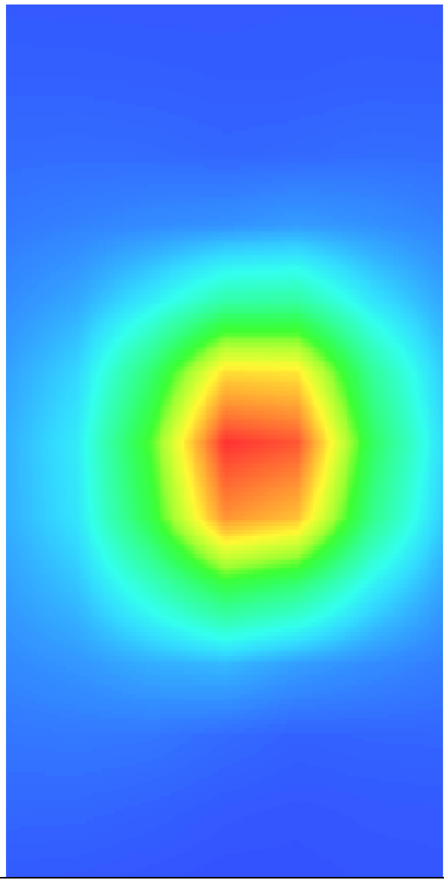
Maximum location: X=-1.00, Y=-1.00

SAR Peak: 9.83 W/kg

SAR 10g (W/Kg)	2.391231
SAR 1g (W/Kg)	5.072129

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	9.7142	5.8385	2.9279	1.4635	0.7406	0.3749	0.1919



3D screen shot	Hot spot position
	

MEASUREMENT 2

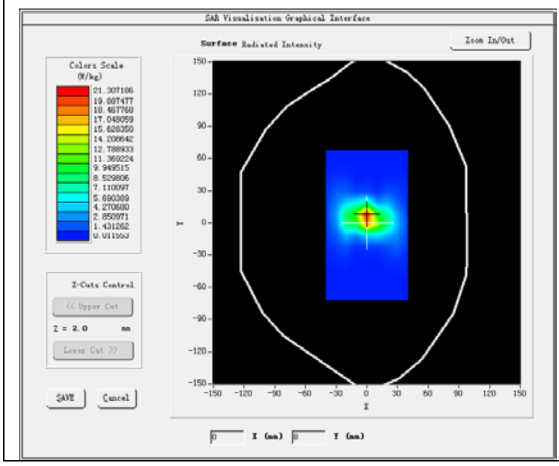
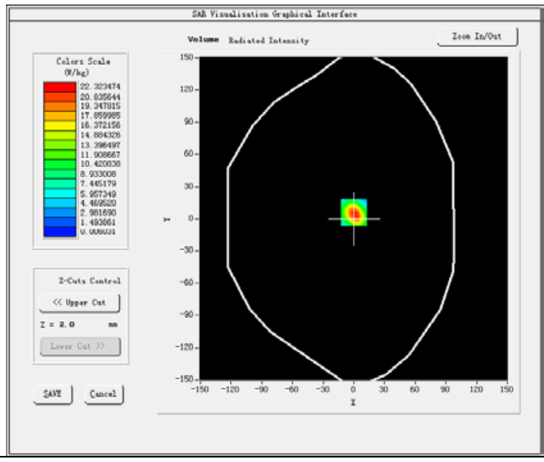
Date of measurement: 30/7/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Dipole
Band	CW5200
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.07

B. SAR Measurement Results

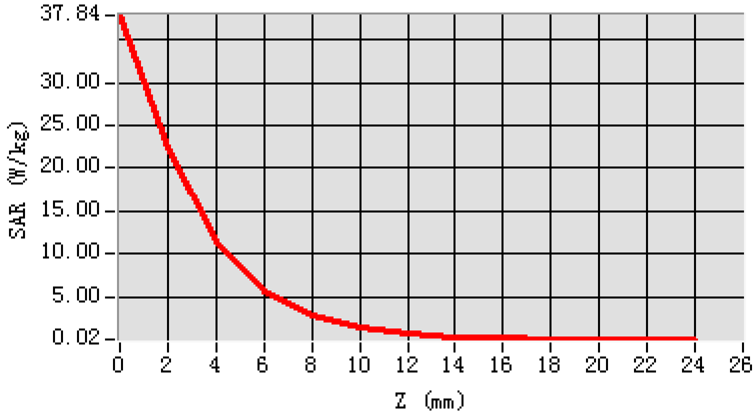
Frequency (MHz)	5200.000000
Relative permittivity (real part)	34.481364
Relative permittivity (imaginary part)	15.578307
Conductivity (S/m)	4.500400
Variation (%)	-2.960000

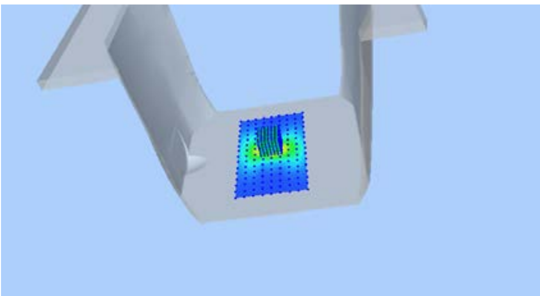
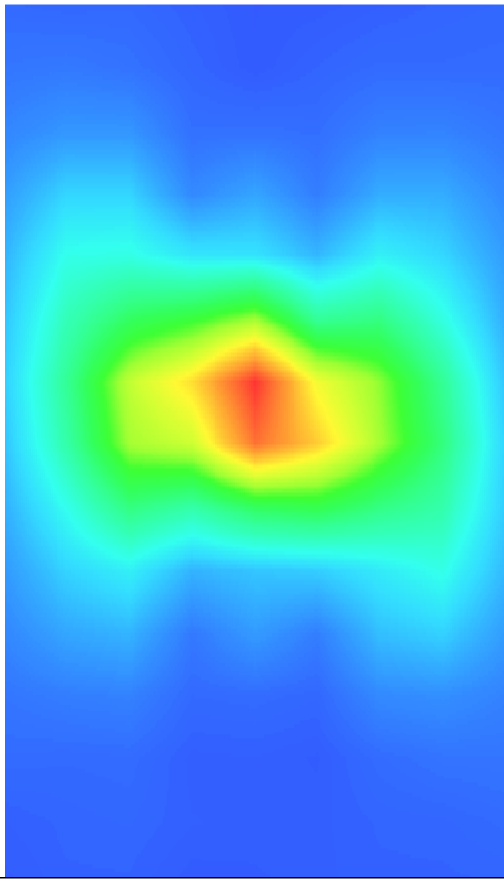
SURFACE SAR	VOLUME SAR
	

Maximum location: X=0.00, Y=6.00
SAR Peak: 40.06 W/kg

SAR 10g (W/Kg)	6.050168
SAR 1g (W/Kg)	17.042132

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	37.803	22.359	11.354	5.6688	2.8267	1.4093	0.7144	0.3661	0.1845	0.1085	0.0545	0.0326



3D screen shot	Hot spot position
	

MEASUREMENT 3

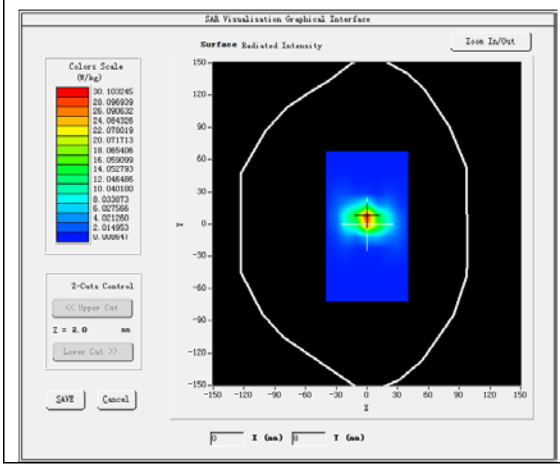
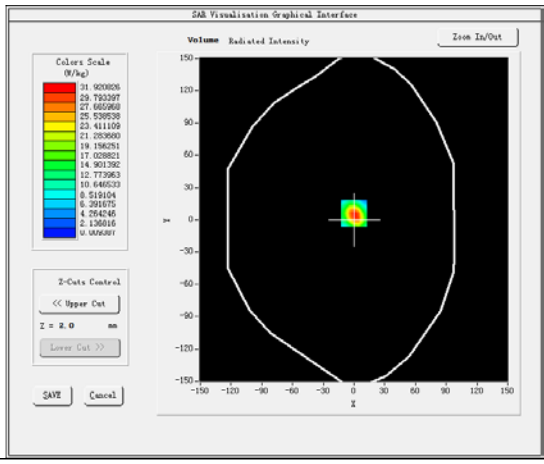
Date of measurement: 31/7/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Dipole
Band	CW5800
Channels	Middle
Signal	CW (Crest factor: 1.0)
ConvF	2.04

B. SAR Measurement Results

Frequency (MHz)	5800.000000
Relative permittivity (real part)	33.912514
Relative permittivity (imaginary part)	15.965078
Conductivity (S/m)	5.144303
Variation (%)	-2.800000

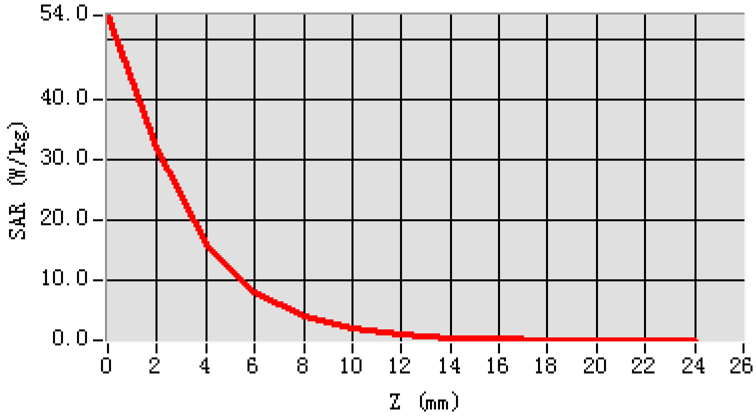
SURFACE SAR	VOLUME SAR
	

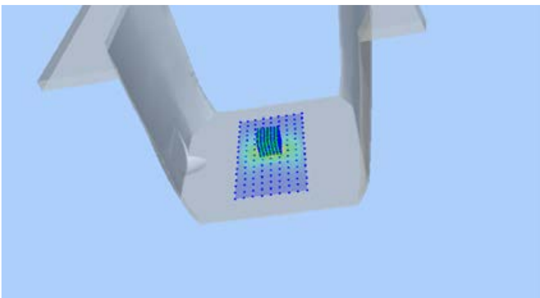
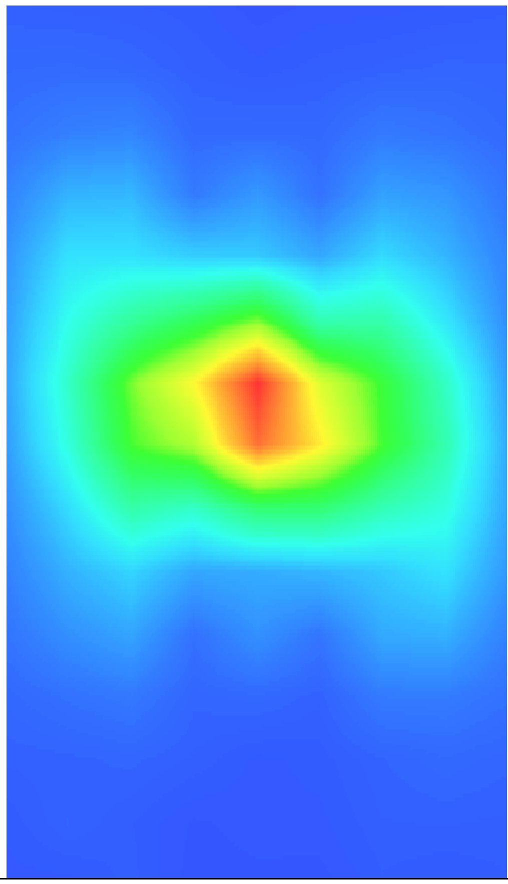
Maximum location: X=0.00, Y=6.00

SAR Peak: 57.37 W/kg

SAR 10g (W/Kg)	5.525255
SAR 1g (W/Kg)	18.828047

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	54.052	31.953	16.184	8.1716	4.0876	2.0571	1.0382	0.5190	0.2707	0.1534	0.0711	0.0410



3D screen shot	Hot spot position
	

13. Appendix C. Plots of High SAR Measurement

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MEASUREMENT 1

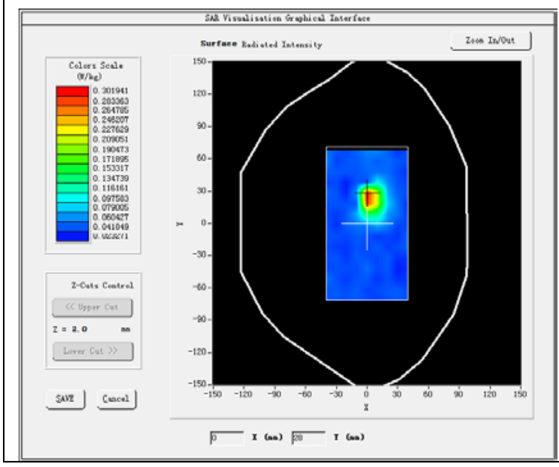
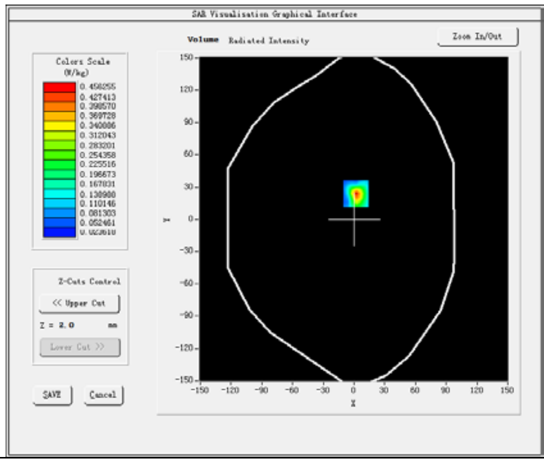
Date of measurement: 30/7/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11a U-NII
Channels	Mid
Signal	IEEE802.11a (Crest factor: 1.0)
ConvF	2.07

B. SAR Measurement Results

Frequency (MHz)	5200.000000
Relative permittivity (real part)	34.481364
Relative permittivity (imaginary part)	15.578307
Conductivity (S/m)	4.500400
Variation (%)	4.260000

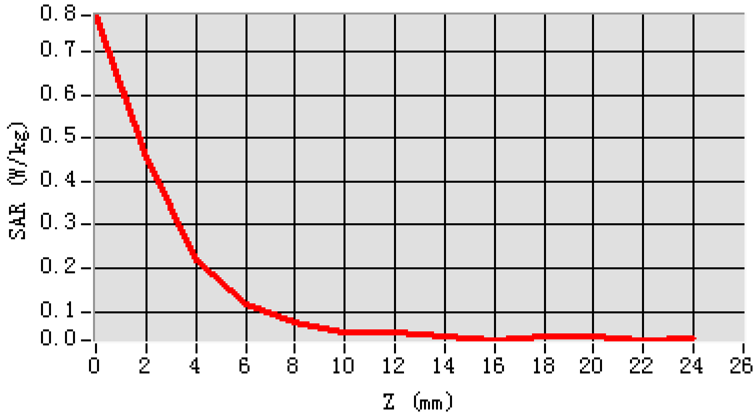
SURFACE SAR	VOLUME SAR
	

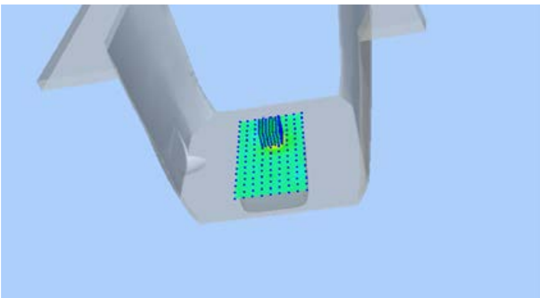
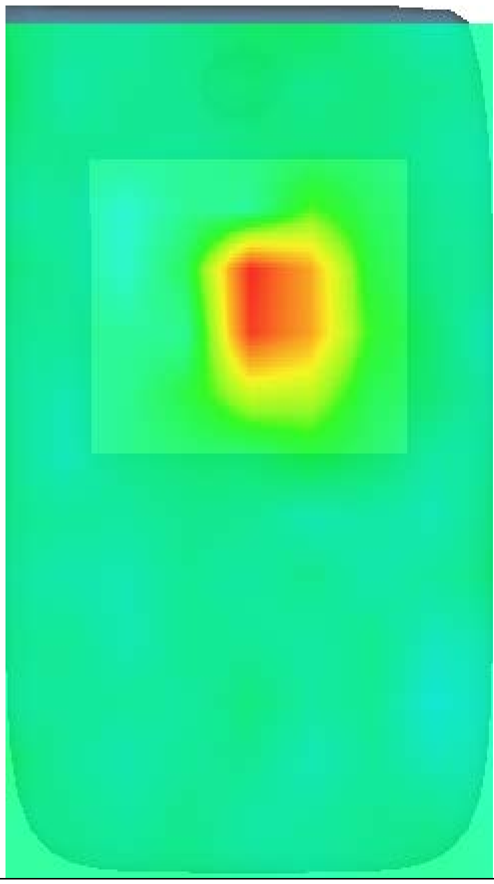
Maximum location: X=2.00, Y=24.00

SAR Peak: 0.82 W/kg

SAR 10g (W/Kg)	0.092370
SAR 1g (W/Kg)	0.236176

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	0.7831	0.4563	0.2187	0.1183	0.0737	0.0515	0.0503	0.0426	0.0340	0.0417	0.0443	0.0349



3D screen shot	Hot spot position
	

MEASUREMENT 2

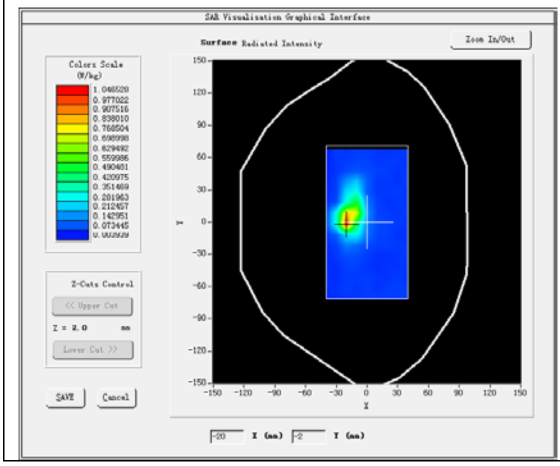
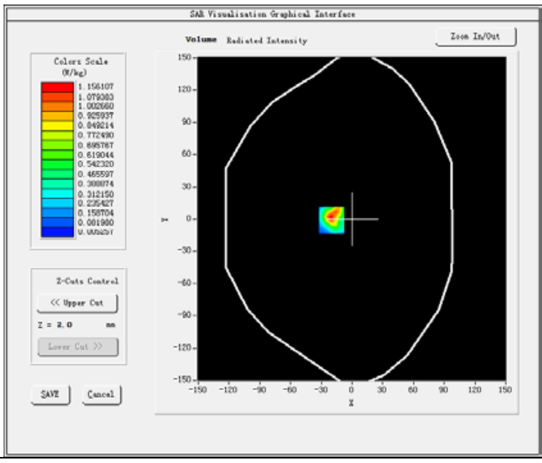
Date of measurement: 31/7/2024

A. Experimental conditions.

Area Scan	dx=10mm dy=10mm, h= 2.00 mm
ZoomScan	7x7x12,dx=4mm dy=4mm dz=2mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11a U-NII
Channels	Mid
Signal	IEEE802.11a (Crest factor: 1.0)
ConvF	2.04

B. SAR Measurement Results

Frequency (MHz)	5785.000000
Relative permittivity (real part)	33.988465
Relative permittivity (imaginary part)	15.840635
Conductivity (S/m)	5.091004
Variation (%)	1.880000

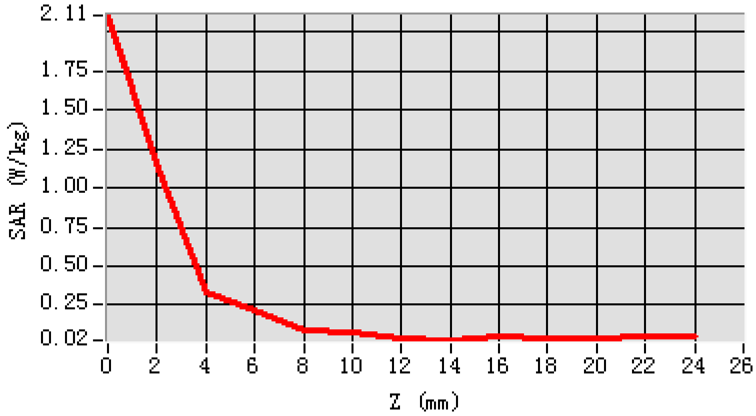
SURFACE SAR	VOLUME SAR
	

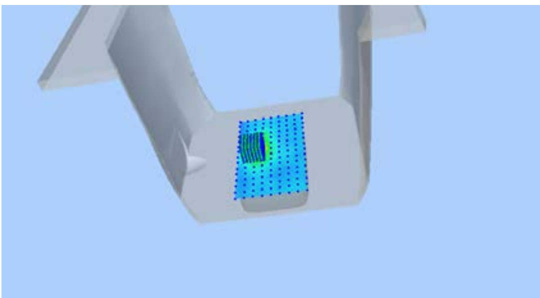
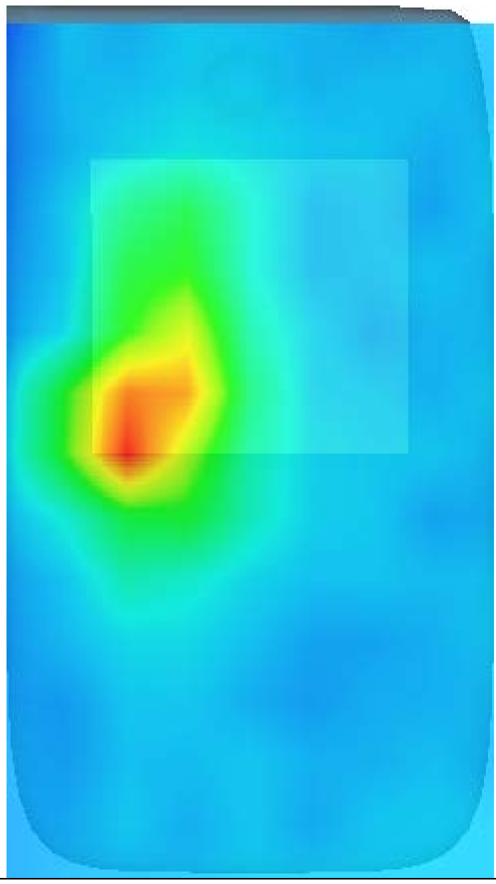
Maximum location: X=-20.00, Y=-1.00

SAR Peak: 2.23 W/kg

SAR 10g (W/Kg)	0.220459
SAR 1g (W/Kg)	0.602177

Z (mm)	0.00	2.00	4.00	6.00	8.00	10.00	12.00	14.00	16.00	18.00	20.00	22.00
SAR (W/Kg)	2.1092	1.1561	0.3360	0.2229	0.0862	0.0789	0.0401	0.0248	0.0451	0.0318	0.0321	0.0486



3D screen shot	Hot spot position
	

MEASUREMENT 3

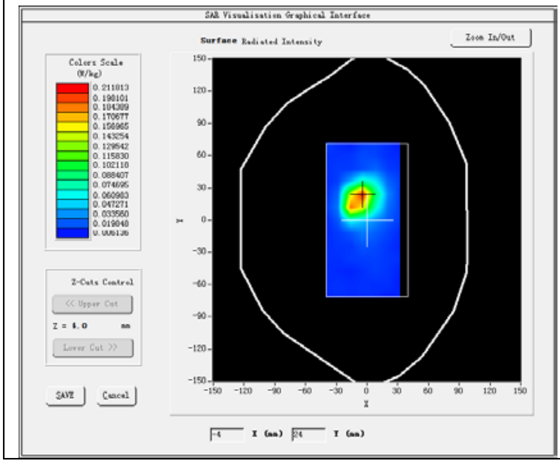
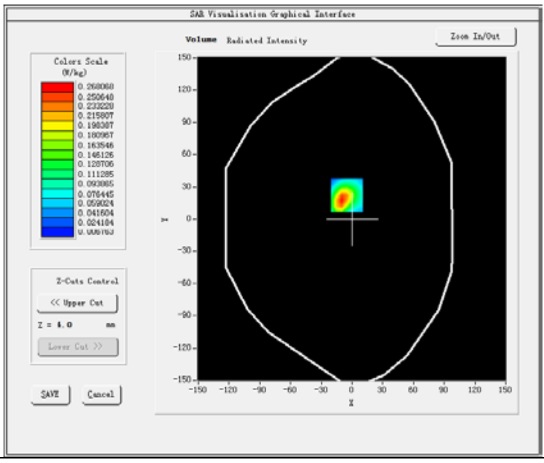
Date of measurement: 7/8/2024

A. Experimental conditions.

Area Scan	dx=12mm dy=12mm, h= 5.00 mm
ZoomScan	7x7x7,dx=5mm dy=5mm dz=5mm
Phantom	Validation plane
Device Position	Body
Band	IEEE 802.11b ISM
Channels	Low
Signal	IEEE802.11b (Crest factor: 1.0)
ConvF	2.85

B. SAR Measurement Results

Frequency (MHz)	2437.000000
Relative permittivity (real part)	37.963086
Relative permittivity (imaginary part)	13.076779
Conductivity (S/m)	1.770450
Variation (%)	-3.700000

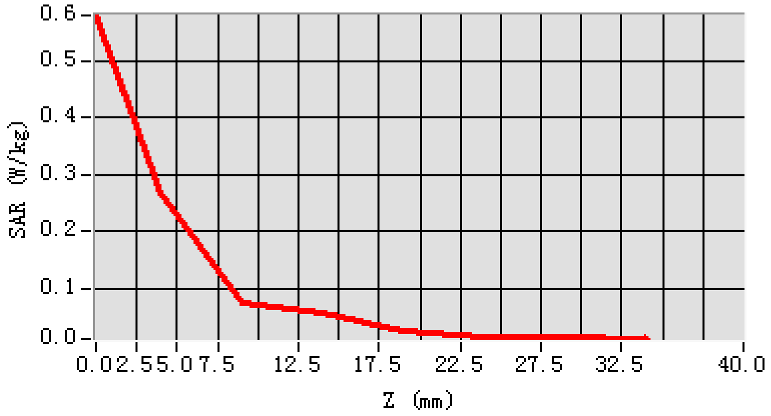
SURFACE SAR	VOLUME SAR
	

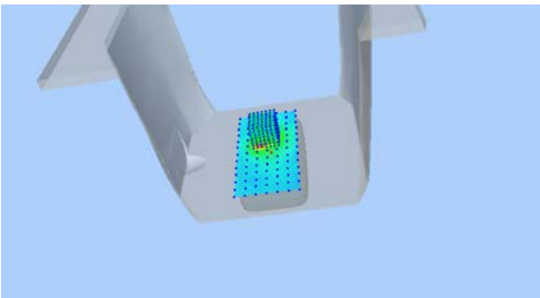
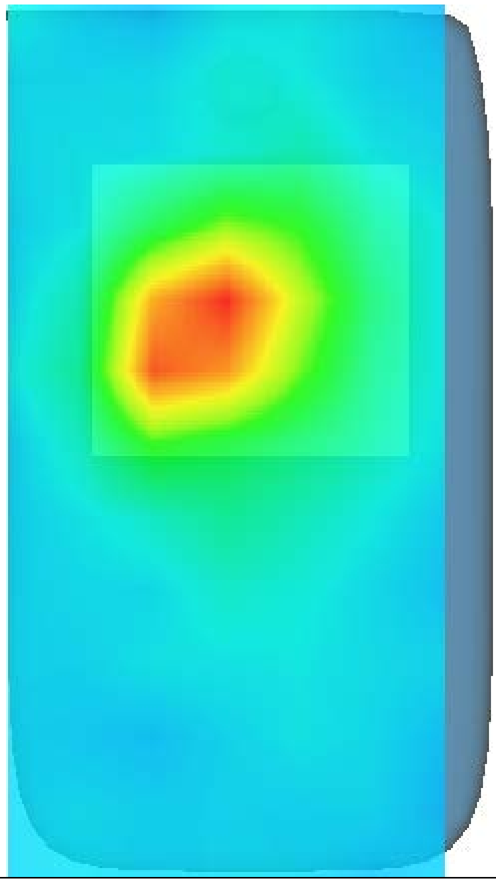
Maximum location: X=-5.00, Y=22.00

SAR Peak: 0.48 W/kg

SAR 10g (W/Kg)	0.101674
SAR 1g (W/Kg)	0.244014

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.5808	0.2681	0.0755	0.0559	0.0243	0.0142	0.0130



3D screen shot	Hot spot position
	

14. Appendix D. Calibration Certificate

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COMOSAR E-Field Probe Calibration Report

Ref : ACR.261.11.23.BES.A

SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.
BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET,
BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: 3423-EPGO-426

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

Calibration date: 09/18/2023

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 :	Cyrille ONNEE	Measurement Responsible	9/18/2023	
Checked & approved by:	Jérôme Luc	Technical Manager	9/18/2023	
Authorized by:	Yann Toutain	Laboratory Director	9/19/2023	Yann TOUTAIN

Yann Toutain ID Signature numérique de Yann Toutain ID Date : 2023.09.19 09:08:14 +02'00'

	Customer Name
Distribution :	SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

Issue	Name	Date	Modifications
A	Cyrille ONNEE	9/18/2023	Initial release

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1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	3423-EPGO-426
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.261 MΩ Dipole 2: R2=0.213 MΩ Dipole 3: R3=0.233 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

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

Figure 1 – *MVG COMOSAR Dosimetric E field Probe*

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

3 MEASUREMENT METHOD

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

3.1 SENSITIVITY

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

3.2 LINEARITY

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

3.3 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°).

3.4 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:

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

where

$\mathrm{SAR}_{\mathrm{uncertainty}}$	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;
$\Delta\mathrm{SAR}_{\mathrm{be}}$	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 SARuncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).

4 MEASUREMENT UNCERTAINTY

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

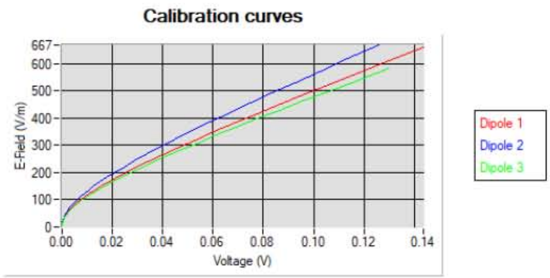
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

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

5.1 CALIBRATION IN AIR

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



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

$$E^2 = \sum_{i=1}^{3} \frac{V_i \left(1 + {V_i}/{DCP_i}\right)}{Norm_i}$$

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

Normx dipole 1 (μV/(V/m)²)	Normy dipole 2 (μV/(V/m)²)	Normz dipole 3 (μV/(V/m)²)
0.78	0.62	0.85

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
105	108	107

5.2 CALIBRATION IN LIQUID

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

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

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

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

where
σ=the conductivity of the liquid
ρ=the volumetric density of the liquid
SAR=the SAR measured from the formula that depends on the setup used. The SAR formulas are given below

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

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

where
c=the specific heat for the liquid
dT/dt=the temperature rises over the time

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

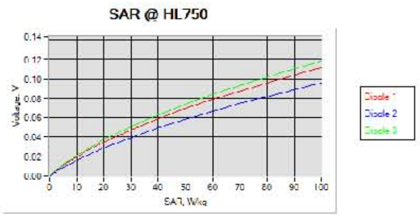
$$SAR = \frac{4P_W}{ab\delta}e^{\frac{-2z}{\delta}}$$

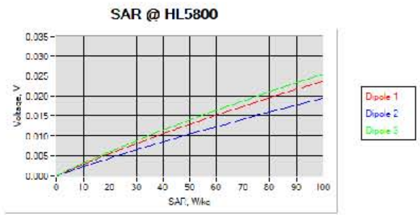
where
a=the larger cross-sectional of the waveguide
b=the smaller cross-sectional of the waveguide
δ=the skin depth for the liquid in the waveguide
Pw=the power delivered to the liquid

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

Liquid	Frequency (MHz*)	ConvF
HL750	750	2.37
HL850	835	2.32
HL900	900	2.23
HL1800	1800	2.45
HL1900	1900	2.63
HL2000	2000	2.83
HL2300	2300	2.81
HL2450	2450	2.85
HL2600	2600	2.65
HL3300	3300	2.21
HL3500	3500	2.20
HL3700	3700	2.11
HL3900	3900	2.40
HL4200	4200	2.40
HL4600	4600	2.33
HL4900	4900	2.37
HL5200	5200	2.07
HL5400	5400	2.11
HL5600	5600	2.20
HL5800	5800	2.04

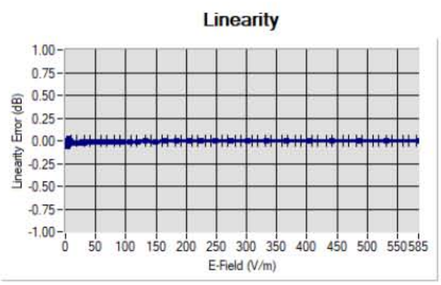
(*) Frequency validity is +/-50MHz below 600MHz, +/-100MHz from 600MHz to 6GHz and +/-700MHz above 6GHz



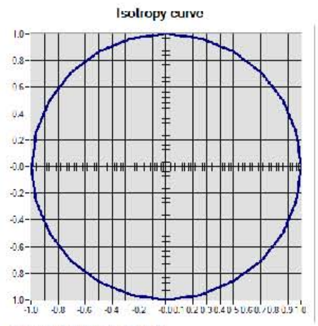


6 VERIFICATION RESULTS

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



Linearity:+/-1.42% (+/-0.06dB)



Isotropy +/-0.21% (+/-0.01dB)

7 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	10/2023
Network Analyzer – Calibration kit	HP 85033D	3423A08186	06/2021	06/2027
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	07/2022	07/2025
Multimeter	Keithley 2000	4013982	02/2023	02/2026
Signal Generator	Rohde & Schwarz SMB	106589	03/2022	03/2025
Amplifier	MVG	MODU-023-C-0002	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Power Meter	NI-USB 5680	170100013	06/2021	06/2024
Power Meter	Keysight U2000A	SN: MY62340002	10/2022	10/2025
Directional Coupler	Krytar 158020	131467	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.
Fluoroptic Thermometer	LumaSense Luxtron 812	94264	09/2022	09/2025
Coaxial cell	MVG	SN 32/16 COAXCELL_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG2_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G600_1	Validated. No cal required.	Validated. No cal required.

Waveguide	MVG	SN 32/16 WG4_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_0G900_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG6_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG8_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800B_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_1G800H_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG10_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_3G500_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG12_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_5G000_1	Validated. No cal required.	Validated. No cal required.
Waveguide	MVG	SN 32/16 WG14_1	Validated. No cal required.	Validated. No cal required.
Liquid transition	MVG	SN 32/16 WGLIQ_7G000_1	Validated. No cal required.	Validated. No cal required.
Temperature / Humidity Sensor	Testo 184 H1	44225320	06/2021	06/2024