

TEST REPORT

FCC SAR Test for certification of K44501103

APPLICANT

JVCKENWOOD Corporation

REPORT NO.

HCT-SR-2105-FC001

DATE OF ISSUE

May. 14, 2021

Tested by

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Applicant

JVCKENWOOD Corporation
1-16-2 Hakusan Midori-ku Yokohama-shi Kanagawa 226-8525 Japan

Equipment Type

UHF TRANSCEIVER

Model Name

NX-1300-K2, NX-1300-K, NX-1300-K3, NX-1302-K

FCC ID

K44501103

Date of Test

Apr. 08, 2021 ~ Apr. 09, 2021

FCC Rule Part(s)

CFR §2.1093

This device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in FCC KDB procedures and had been tested in accordance with the measurement procedures specified in FCC KDB procedures.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

The result shown in this test report refer only to the sample(s) tested unless otherwise stated.

This test results were applied only to the test methods required by the standard.

REVISION HISTORY

The revision history for this test report is shown in table.

Revision No.	Date of Issue	Description
0	May 14, 2021	Initial Release

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1. Test Regulations

The tests were performed according to the following regulations:

Test Standard	IEEE Standard 1528-2013 & KDB procedures
Test Method	<ul style="list-style-type: none">- FCC KDB Publication 447498 D01 General SAR Guidance v06- FCC KDB Publication 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04- FCC KDB Publication 865664 D02 SAR Reporting v01r02- FCC KDB Publication 643646 D01 SAR Test for PTT Radios v01r03

2. Test Location

2.1 Test Laboratory

Company Name	HCT Co., Ltd.
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Telephone	031-645-6300
Fax.	031-645-6401

3. Information of the EUT

3.1 General Information of the EUT

Model Name	NX-1300-K2, NX-1302-K, NX-1300-K3, NX-P1300-K
Equipment Type	UHF TRANSCEIVER
FCC ID	K44501103
Applicant	JVCKENWOOD Corporation

3.2 DUT description

16 key with LCD



7 key with LCD



non key, non LCD



* Three type of sample comparison result 16 key with LCD type SAR is high, so the entire test is proceeded.

3.3 Attestation of test result of device under test

The Highest Reported SAR (W/Kg)				
Band	Tx. Frequency (MHz)	Equipment Class	Reported 1g SAR SAR (W/kg)	
			Hand-held to Face	Body-Worn Belt clip
UHF (FCC)	450 ~ 512	TNF	4.27	5.74
Simultaneous SAR per KDB 690783 D01v01r03			N/A	
Date(s) of Tests:	Apr. 08, 2021 ~ Apr. 09, 2021			

Note : The Duty Cycle of PTT was 50% applied.

4. Output Power Specifications

This device operates using the following maximum output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB publication 447498 D01v06.

4.1 Maximum Output Power

Band	Frequency	Power
UHF	450 ~ 512 MHz	5 W ($\pm 0.2W$)
	450 ~ 512 MHz	2W

4.2 Output Average Conducted Power

(5W)

Frequency (MHz)	Type	Channel	Power (dBm)
450.05	Analog	1	36.44
465.5	Analog	2	36.31
481.05	Analog	3	36.28
496.5	Analog	4	36.26
511.95	Analog	5	36.38

(2 W)

Frequency (MHz)	Type	Channel	Power (dBm)
450.05	Analog	1	32.84
465.5	Analog	2	33.45
481.05	Analog	3	32.83
496.5	Analog	4	32.48
511.95	Analog	5	32.52

For FCC Band:

Per KDB 447498 D01v06 Page 7 section 6) pages 7-8, the number of channels required to be tested is as follows.

$$F_{\text{high}} = 511.95 \text{ MHz}$$

$$F_c = 481.05 \text{ MHz}$$

$$F_{\text{Low}} = 450.05 \text{ MHz}$$

$$N_c = \text{Round} \{ [100(f_{\text{high}} - f_{\text{low}}) / f_c]^{0.5} \times (f_c / 100)^{0.2} \} = \text{Round} \{ [100(511.95 - 450.05) / 481.05]^{0.5} \times (481.05 / 100)^{0.2} \} = 5$$

Therefore, for the frequency band from 450.05 MHz to 511.95, 5 channels are required for testing.

5. Manufacturer's Accessory List

Part Nol.	Description	Accessory Type	Accessory
KRA-23M	UHF Low Profile Helical Antenna (440-490 MHz)	Antenna	1
KRA-23M2	UHF Low Profile Helical Antenna (470-520 MHz)		2
KRA-27M	UHF Whip Antenna (440-490 MHz)		3
KRA-27M2	UHF Whip Antenna (470-520 MHz)		4
KRA-42M	UHF Stubby Antenna (440-490 MHz)		5
KRA-42M2	UHF Stubby Antenna (470-520 MHz)		6
KNB-45L	Li-Ion Battery Pack (1500mAh)	Battery	1
KNB-53N	Ni-MH Battery Pack (1400mAh)		2
KNB-29N	Ni-MH Battery Pack (1500mAh)		3
KNB-69L	Li-ion Battery Pack (2450mAh)		4
KNB-82LC	Li-ion Battery Pack for IS (2,000mAh)		5
KNB-84L	Li-ion Battery Pack (1900mAh)		6
KWR-1	Water Resistance Bag	Carrying Accessories	1
KBH-10	Belt Clip (with Radio)		2
KLH-187	Nylon Case		3
KLH-178	Leather Case		4
KLH-181PC	Leather Case w/ Integral Belt Clip		5
KLH-182PG	Leather Case w/ Swivel Belt Loop		6
KLH-6SW	Leather Swivel Belt Loop		7
KMC-45D	Speaker Microphone	Microphones & Audio Accessories	1
KMC-45	Speaker Microphone		2
KMC-21	Compact Speaker Microphone		3
KEP-2	25mm Earphone kit for KMC-45		4
KHS-10-BH	Heavy-duty headset		5
KHS-10-OH	Heavy-duty headset		6
KHS-10D-BH	Heavy-duty headset		7
KHS-10D-OH	Heavy-duty headset		8
KHS-7	Single Muff Headset		9
KHS-7A	Single Muff Headset w/in-line PTT		10
KHS-8BL	2-Wire Palm Mic w/ Earphone		11
KHS-8BE	2-Wire Palm Mic w/ Earphone		12
KHS-8NC	2-Wire Palm Mic w/ Earphone, NC		13
KHS-9BL	3-Wire Lapel Mic w/ Earphone		14
KHS-9BE	3-Wire Lapel Mic w/ Earphone		15
KHS-22	Behind-the-head Headset w/PTT		16
KHS-22A	Behind-the-head Headset w/PTT		17
KHS-23	2-Wire Palm Mic		18
KHS-25	D-Ring Ear Headset		19
KHS-26	Ear bund In-line PTT Headset		20
KHS-27	D-Ring In-line PTT Headset		21
KHS-27A	D-Ring In-line PTT Headset		22
KHS-31	C-Ring Headset		23
KHS-31C	C-Ring Headset		24
KHS-1	Headset with PTT/VOX		25
KHS-21	Headset		26
KHS-29F	Headset		27
EMC-11	Clip Microphone with Earphone		28
KHS-35F	Headset		29
EMC-12	Clip Microphone with Earphone		30
KMC-48GPS	GPS Speaker Microphone		31

*** Note: Battery Dimensions**

No.	description	Size (mm)
KNB-45L	Li-Ion Battery Pack (2,000mAh)	WHD 54.0 x 114.7 x 17.7
KNB-53N	Ni-MH Battery Pack (1,400mAh)	WHD 54.0 x 114.7 x 17.7
KNB-29N	Ni-MH Battery Pack (1,500mAh)	WHD 54.0 x 114.7 x 17.7
KNB-69L	Li-ion Battery Pack (2,450mAh)	WHD 54.0 x 114.7 x 21.8
KNB-82LC	Li-ion Battery Pack for IS (2,000mAh)	WHD 54.0 x 114.7 x 17.7
KNB-84L	Li-ion Battery Pack (1,900mAh)	WHD 54.0 x 114.7 x 17.7

This SAR report is the result of a change test for the addition of a battery Since the additional battery has the biggest capacity of the battery, the Head Face SAR test were performed the Full SAR test and the body worn SAR were evaluated under the he thinnest battery of all batteries.

Radio Face Test (Hand-held to Face)

Battery 1					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes
Battery 2					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes
Battery 3					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes
Battery 4					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes
Battery 5					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes
Battery 6					
Ant. 1	Ant. 2	Ant. 3	Ant. 4	Ant. 5	Ant. 6
Yes	Yes	Yes	Yes	Yes	Yes

Radio Body Test (Body-Worn)

Audio Accessory	Battery					
	1	2	3	4	5	6
1	No	No	No	No	No	No
2	No	No	No	No	No	No
3	No	No	No	No	No	No
4	No	No	No	No	No	No
5	No	No	No	No	No	No
6	No	No	No	No	No	No
7	No	No	No	No	No	No
8	No	No	No	No	No	No
9	No	No	No	No	No	No
10	No	No	No	No	No	No
11	No	No	No	No	No	No
12	No	No	No	No	No	No
13	No	No	No	No	No	No
14	No	No	No	No	No	No
15	No	No	No	No	No	No
16	No	No	No	No	No	No
17	No	No	No	No	No	No
18	No	No	No	No	No	No
19	No	No	No	No	No	No
20	No	No	No	No	No	No
21	No	No	No	No	No	No
22	No	No	No	No	No	No
23	No	No	No	No	No	No
24	No	No	No	No	No	No
25	No	No	No	No	No	No
26	No	No	No	No	No	No
27	No	No	No	No	No	No
28	No	No	No	No	No	No
29	No	No	No	No	No	No
30	No	No	No	No	No	No
31	Yes	Yes	Yes	Yes	Yes	Yes

* Manufacture's disclosed accessory listing information provided by Kenwood corporation.

6. Introduction

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

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York 10017. The measurement procedure described in IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in Biological Effects and Exposure Criteria for Radio Frequency Electromagnetic Fields," NCRP Report No. 86 NCRP, 1986, Bethesda, MD 20814. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

SAR Definition

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

$$SAR = \frac{d}{dt} \left(\frac{dW}{dm} \right)$$

Figure 1. SAR Mathematical Equation
SAR is expressed in units of Watts per Kilogram (W/kg)

$$SAR = \sigma E^2 / \rho$$

Where:

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

ρ = mass density of the tissue-simulant material (kg/m³)

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

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

7. Description of test equipment

7.1 SAR MEASUREMENT SETUP

These measurements are performed using the DASY4 automated dosimetric assessment system. It is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland. It consists of high precision robotics system (Staubli), robot controller, Pentium III computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the brain equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Figure.2).

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and remote control, is used to drive the robot motors. The PC with Windows XP or Windows 7 is working with SAR Measurement system DASY4 & DASY5, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC plug-in card.

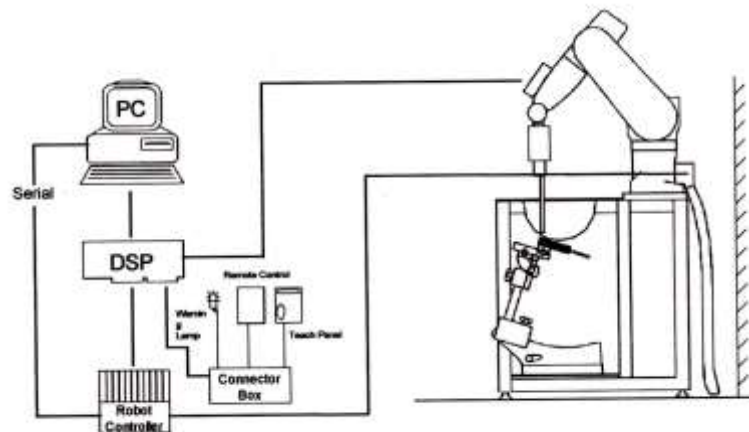


Figure 2. HCT SAR Lab. Test Measurement Set-up

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

7.2 ELI Phantom


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 diametric probes and dipoles.



Figure 6.1 ELI Phantom

Shell Thickness	$2.0 \pm 0.2\text{mm}$
Filling Volume	approx. 30 liters
Dimensions	Major axis: 600 mm, Minor axis: 400 mm


7.3 Device Holder for Transmitters

Device Holder – Mounting Device	
<p>In combination with the SAM Phantom, the Mounting Device enables the rotation of the mounted transmitter in spherical coordinates whereby the rotation points is the ear opening. The devices can be easily, accurately, and repeatably positioned according to the EN 50360:2001/A:2001 and FCC KDB specifications. The device holder can be locked at different phantom locations (left head, right head, flat phantom).</p> <p>Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produced infinite number of configurations. To produce the Worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.</p>	

7.4 Validation Dipole

The reference dipole should have a return loss better than -20 dB (measured in the setup) at the resonant frequency to reduce the uncertainty in the power measurement.

450 Dipole

System Validation Dipole		
Description	ymmetrical dipole with $\lambda/4$ balun. Enables measurement of feedpoint impedance with network analyzer (NWA). Matched for use near flat phantoms filled with tissue simulating liquids.	
Frequency	450 MHz	
Return Loss	> 20 dB at specified validation position	
Power Capability	> 100 W (f < 1GHz), >40 W (f > 1 GHz)	
Dimension	D450V2: dipole length : 272.0 mm ; overall height : 330.0 mm	

7.5 Brain & Muscle Tissue Simulating Mixture Characterization

The brain and muscle mixtures consist of a viscous gel using hydrox-ethyl cellulose (HEC) gelling agent and saline solution (see Table 1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The mixture characterizations used for the brain and muscle tissue simulating liquids are according to the data by C. Gabriel and G. Hartsgrove.

Frequency (MHz)	30	50		144		450		835	900	
Recipe source number	3	3	2	2	3	2	4	2	2	4
Ingredients (% by weight)										
Deionised water	48,30	48,30	53,53	55,12	48,30	48,53	56	50,36	50,31	56
Tween			44,70	43,31		49,51		48,39	48,34	
Oxidised mineral oil							44			44
Diethyleneglycol monohexylether										
Triton X-100										
Diacetin	50,00	50,00			50,00					
DGBE										
NaCl	1,60	1,60	1,77	1,57	1,60	1,96		1,25	1,35	
Additives and salt	0,10	0,10			0,10					
Measured dielectric parameters										
ϵ_r^*	54,2	53,1	54,54	52,81	51,0	43,29	42,3	41,6	41,0	40,6
σ (S/m)	0,75	0,75	0,76	0,76	0,77	0,88	0,84	0,90	0,98	0,98
Temp. (°C)			21	21		21	20	21	21	20
ϵ_{temp_liquid} uncertainty (%)	0,8	0,1			0,1	0,1		0,04	0,04	
σ_{temp_liquid} uncertainty (%)	2,8	2,8			2,6	4,2		1,6	1,6	
Target values (from Table 1)										
ϵ_r^*	55,0	54,5		52,4		43,5		41,5		41,5
σ (S/m)	0,75	0,75		0,76		0,87		0,90		0,97

8. SAR Measurement Procedure

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

1. The SAR distribution at the exposed side of the head or body was measured at a distance no more than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the DUT's head and body area and the horizontal grid resolution was depending on the FCC KDB 865664 D01v01r04 table 4-1 & IEEE 1528-2013.
2. Based on step, the area of the maximum absorption was determined by sophisticated interpolations routines implemented in DASY software. When an Area Scan has measured all reachable point. DASY system computes the field maximal found in the scanned are, within a range of the maximum. SAR at this fixed point was measured and used as a reference value.
3. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB 865664 D01v01r04 table 4-1 and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (reference from the DASY manual.)
 - a. The data at the surface were extrapolated, since the center of the dipoles is no more than 2.7 mm away from the tip of the probe (it is different from the probe type) and the distance between the surface and the lowest measuring point is 1.2 mm. 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.
 - b. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed using the 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions. The volume was integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan. If the value changed by more than 5 %, the SAR evaluation and drift measurements were repeated.

Area scan and zoom scan resolution setting follow KDB 865664 D01v01r04 quoted below.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5±1 mm	1/2·δ·ln(2)±0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30°±1°	20°±1°
Maximum area scan Spatial resolution: Δx _{Area} , Δy _{Area}			≤ 2 GHz: ≤15 mm 2-3 GHz: ≤12 mm	3-4 GHz: ≤12 mm 4-6 GHz: ≤10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan Spatial resolution: Δx _{zoom} , Δy _{zoom}			≤ 2 GHz: ≤8mm 2-3 GHz: ≤5mm*	3-4 GHz: ≤5 mm* 4-6 GHz: ≤4 mm*
Maximum zoom scan Spatial resolution normal to phantom surface	uniform grid: Δz _{zoom} (n)		≤ 5 mm	3-4 GHz: ≤4 mm 4-5 GHz: ≤3 mm 5-6 GHz: ≤2 mm
	graded grid	Δz _{zoom} (1): between 1 st two Points closest to phantom surface	≤ 4 mm	3-4 GHz: ≤3 mm 4-5 GHz: ≤2.5 mm 5-6 GHz: ≤2 mm
		Δz _{zoom} (n>1): between subsequent Points	≤1.5·Δz _{zoom} (n-1)	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3-4 GHz: ≥28 mm 4-5 GHz: ≥25 mm 5-6 GHz: ≥22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.
* When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

9. Description of Test Position

9.1 Body Holster/Belt Clip Configurations

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration. A device with a headset output is tested with a headset connected to the device. Body dielectric parameters are used.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with each accessory. If multiple accessory share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some Devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used.

Since this EUT does not supply any body worn accessory to the end user a distance of 0 cm from the EUT back surface to the liquid interface is configured for the generic test.

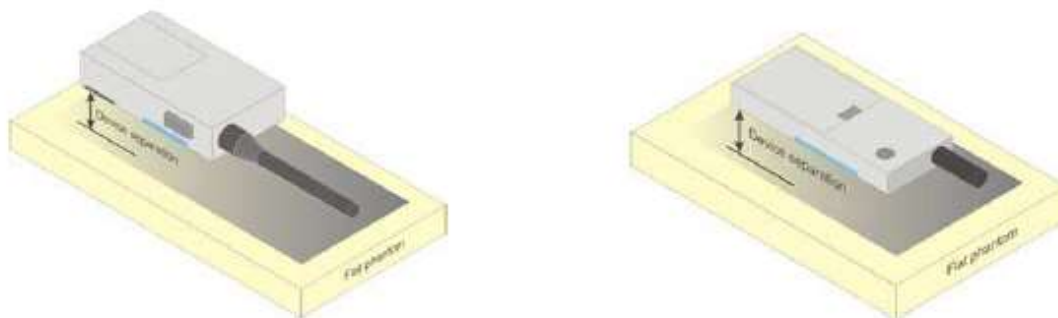
"See the Test SET-UP Photo"

Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessory(ies), Including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.

In all cases SAR measurements are performed to investigate the worst-case positioning. Worst case positioning is then documented and used to perform Body SAR testing.

9.2 Hand-held to Face device

A typical example of a front-of-face device is a two-way radio that is held at a distance from the face of the user when transmitting. In these cases the device under test shall be positioned at the distance to the phantom surface that corresponds to the intended use as specified by the manufacturer in the user instructions. If the intended use is not specified, a separation distance of 25 mm⁵ between the phantom surface and the device shall be used.



10. RF Exposure Limits

HUMAN EXPOSURE	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Occupational (W/kg) or (mW/g)
SPATIAL PEAK SAR * (Brain)	1.60	8.00
SPATIAL AVERAGE SAR ** (Whole Body)	0.08	0.40
SPATIAL PEAK SAR *** (Hands / Feet / Ankle / Wrist)	4.00	20.00

Table 8.1 Safety Limits for Partial Body Exposure

NOTES:

* The Spatial Peak value of the SAR averaged over any 1 g 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 g 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. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

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

11. System Verification

11.1 Tissue Verification

The Head /body simulating material is calibrated by HCT using the DAKS 3.5 to determine the conductivity and permittivity.

Table for Head Tissue Verification									
Date of Tests	Tissue Temp. (°C)	Tissue Type	Freq. (MHz)	Measured Conductivity σ (S/m)	Measured Dielectric Constant, ϵ	Target Conductivity σ (S/m)	Target Dielectric Constant, ϵ	% dev σ	% dev ϵ
04/08/2021	21.2	450H	430	0.829	43.842	0.870	43.740	-4.71	0.23
			450	0.851	43.343	0.870	43.500	-2.18	-0.36
			500	0.894	41.918	0.874	43.240	2.29	-3.06
04/09/2021	20.6	450H	430	0.829	43.832	0.870	43.740	-4.71	0.21
			450	0.851	43.333	0.870	43.500	-2.18	-0.38
			500	0.894	41.911	0.874	43.240	2.29	-3.07

11.2 System Verification

Prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at 450 MHz by using the system Verification kit. (Graphic Plots Attached)

* Input Power: 50 mW

Freq. [MHz]	Date	Probe (S/N)	Dipole (S/N)	Liquid	Amb. Temp. [°C]	Liquid Temp. [°C]	1 W Target SAR _{1g} (SPEAG) [W/kg]	50mW Measured SAR _{1g} [W/kg]	1 W Normalized SAR _{1g} [W/kg]	Deviation [%]	Limit [%]
450	04/08/2021	3302	1007	Head	21.3	21.2	4.76	0.243	4.86	+ 2.10	± 10
450	04/09/2021	3302	1007	Head	20.7	20.6	4.76	0.244	4.88	+ 2.52	± 10

11.3 System Verification Procedure

SAR measurement was prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at each frequency band by using the system verification kit. (Graphic Plots Attached)

- Cabling the system, using the verification kit equipment.
- Generate about 50 mW Input level from the signal generator to the Dipole Antenna.
- Dipole antenna was placed below the flat phantom.
- The measured one-gram SAR at the surface of the phantom above the dipole feed-point should be within 10 % of the target reference value.
- The results are normalized to 1 W input power.

Note;

SAR Verification was performed according to the FCC KDB 865664 D01v01r04.

12. SAR Test Data Summary

12.1 Hand-held to Face SAR Results

Frequency	Ch.	Tune-Up Limit	Conducted Power	Power Drift	Battery	Antenna	Separation Distance	Measured SAR	50% Duty	Reported SAR	Plot No.
450.05	1	37.2	36.44	-0.20	KNB-69L	KRA-23M	25	5.55	2.78	3.46	-
450.05	1	37.2	36.44	-0.29	KNB-69L	KRA-27M	25	5.09	2.55	3.24	-
450.05	1	37.2	36.44	-0.08	KNB-69L	KRA-42M	25	5.79	2.90	3.51	-
465.50	2	37.2	36.31	-0.31	KNB-69L	KRA-42M	25	3.32	1.66	2.19	-
511.95	5	37.2	36.38	-0.43	KNB-69L	KRA-23M2	25	4.00	2.00	2.67	-
511.95	5	37.2	36.38	-0.10	KNB-69L	KRA-27M2	25	5.32	2.66	3.29	-
511.95	5	37.2	36.38	-0.47	KNB-69L	KRA-42M2	25	2.00	1.00	1.35	-
450.05	1	37.2	36.44	-0.39	KNB-45L	KRA-42M	25	6.38	3.19	4.16	-
450.05	1	37.2	36.44	-0.62	KNB-53N	KRA-42M	25	5.54	2.77	3.81	-
450.05	1	37.2	36.44	-0.32	KNB-29N	KRA-42M	25	6.66	3.33	4.27	1
496.50	4	37.2	36.26	-0.11	KNB-82LC	KRA-42M	25	6.03	3.02	3.68	-
496.50	4	37.2	36.26	-0.48	KNB-84L	KRA-42M	25	5.74	2.87	3.82	-
496.50	4	37.2	36.26	-0.35	KNB-29N	KRA-42M	25	0.059	0.03	0.04	-
ANSI/ IEEE C95.1 - 2005 – Safety Limit Spatial Peak Controlled Exposure/ Occupational							Head 8 W/kg (mW/g) Averaged over 1 gram				

* Note : KMC-48GPS

12.2 Body-worn Belt clip SAR Results

Frequency	Ch.	Tune-Up Limit	Conducted Power	Power Drift	Battery	Antenna	Separation Distance	Measured SAR	50% Duty	Reported SAR	Plot No.
450.05	1	37.2	36.44	-0.22	KNB-45L	KRA-23M	0	8.37	4.19	5.24	-
465.50	2	37.2	36.31	-0.38	KNB-45L	KRA-23M	0	7.85	3.93	5.26	-
381.04	3	37.2	36.28	-0.68	KNB-45L	KRA-23M	0	4.26	2.13	3.08	-
450.05	1	37.2	36.44	-0.30	KNB-45L	KRA-27M	0	7.52	3.76	5.00	-
465.50	2	37.2	36.31	-0.25	KNB-45L	KRA-27M	0	8.25	4.13	5.21	-
481.05	3	37.2	36.28	-0.26	KNB-45L	KRA-27M	0	6.96	3.48	4.54	-
450.05	1	37.2	36.44	-0.22	KNB-45L	KRA-42M	0	7.16	3.58	4.68	-
465.50	2	37.2	36.31	-0.25	KNB-45L	KRA-42M	0	4.28	2.14	2.70	-
481.05	3	37.2	36.28	-0.20	KNB-45L	KRA-42M	0	1.88	0.94	1.21	-
511.95	5	37.2	36.38	-0.28	KNB-45L	KRA-23M2	0	4.80	2.40	3.09	-
511.95	5	37.2	36.38	-0.58	KNB-45L	KRA-27M2	0	7.54	3.77	5.33	-
496.50	4	37.2	36.26	-0.23	KNB-45L	KRA-27M2	0	8.21	4.11	5.23	-
511.95	5	37.2	36.38	-0.59	KNB-45L	KRA-42M2	0	2.43	1.22	1.72	-
511.95	5	37.2	36.38	-0.59	KNB-82LC	KRA-27M2	0	7.50	3.75	5.31	-
511.95	5	37.2	36.38	-0.31	KNB-29N	KRA-27M2	0	8.65	4.33	5.74	2
511.95	5	37.2	36.38	-0.36	KNB-53N	KRA-27M2	0	7.57	3.79	5.09	-
511.95	5	37.2	36.38	-0.15	KNB-69L	KRA-27M2	0	8.52	4.26	5.45	-
511.95	5	37.2	36.38	-0.29	KNB-84L	KRA-27M2	0	8.35	4.18	5.52	-
511.95	5	37.2	36.38	-0.88	KNB-29N	KRA-27M2	0	0.093	0.05	0.07	-
ANSI/ IEEE C95.1 - 2005 – Safety Limit Spatial Peak Controlled Exposure/ Occupational							Body 8 W/kg (mW/g) Averaged over 1 gram				

* Note : KMC-48GPS

12.3 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, FCC KDB Procedure.
2. Batteries are fully charged at the beginning of the SAR measurements. A standard battery was used for all SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB 447498 D01v06.
6. Test signal call mode is Manual test cord.
7. The EUT was tested for face-held SAR with a 2.5 cm separation distance between the front of the EUT and the outer surface of the planar phantom.
8. The Body-worn SAR evaluation was performed with the Balt-clip body-worn accessory attached to the DUT and touching the outer surface of the planar phantom.
9. The adjusted SAR value was calculated by first scaling the SAR value up by the drift. This value was then scaled up based on the difference of the upper end the tolerance (37.2 dBm) and the measured conducted power. The resultant value is then multiplied by 0.5 to give the SAR value at 50% duty cycle.
10. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB 447498 D01v06. Test Procedures applied in accordance with FCC KDB 643646 D01v01r03.
11. When the SAR for all antennas tested using the default battery is ≤ 3.5 W/kg, testing of all other required channels is not necessary.
12. When the SAR of an antenna tested on the highest output power using the default battery is > 3.5 W/Kg and ≤ 4.0 W/Kg, testing of the immediately adjacent channel(s) is not necessary, but testing of other required channels may still be required.
13. When the SAR for all antennas tested using the default battery ≤ 4.0 W/kg, test additional batteries using the antenna and channel configuration that resulted in the highest SAR.
14. When the SAR of an antenna tested on the highest output power channel using the default battery is > 4.0 W/kg and ≤ 6.0 W/kg, testing of the required immediately adjacent channel(s) is necessary. For the remaining channels that cannot be excluded, this rule may be applied recursively with respect to the highest output power channel among the remaining channels.
15. Based on the SAR measured in the body-worn test sequence with default audio accessory, if the SAR for the antenna, body-worn accessory and battery combination(s) applicable to an audio accessory is/are > 4.0 W/kg and < 6.0 W/kg, test that audio accessory using the highest body-worn SAR combination (antenna, battery and body-worn accessory) and channel configuration previously identified that is applicable to the audio accessory.
16. When the SAR of an antenna tested is > 6.0 W/kg, test that battery and antenna combination with the default body-worn and audio accessory on the required immediately adjacent channels.
17. If the SAR measured > 7.0 W/kg, test that battery, antenna, body-worn and audio accessory combination on all required channels.

13. Measurement Uncertainty

Measurement Uncertainty for DUT SAR test								
<i>a</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	$h = \frac{c \times f}{e}$	$i = \frac{c \times g}{e}$	<i>k</i>
Source of uncertainty	Uncertainty ± %	Probability distribution	Div.	<i>c</i> / (1 g)	<i>c</i> / (10 g)	Standard Uncertainty ± % (1 g)	Standard Uncertainty ± % (10 g)	<i>v</i> _i or <i>v</i> _{eff}
Measurement system								
Probe calibration	6.65	N	1	1	1	6.65	6.65	∞
Axial isotropy	4.70	R	1.73	0.71	0.71	1.92	1.92	∞
Hemispherical isotropy	9.60	R	1.73	0.71	0.71	3.92	3.92	∞
Boundary effect	2.00	R	1.73	1	1	1.15	1.15	∞
Linearity	4.70	R	1.73	1	1	2.71	2.71	∞
Detection limits	1.00	R	1.73	1	1	0.58	0.58	∞
Readout electronics	0.30	N	1	1	1	0.30	0.30	∞
Response time	0.80	R	1.73	1	1	0.46	0.46	∞
Integration time	2.60	R	1.73	1	1	1.50	1.50	∞
RF ambient conditions - noise	3.00	R	1.73	1	1	1.73	1.73	∞
RF ambient conditions - reflections	3.00	R	1.73	1	1	1.73	1.73	∞
Probe positioner mechanical tolerance	0.80	R	1.73	1	1	0.46	0.46	∞
Probe positioning with respect to phantom shell	6.70	R	1.73	1	1	3.87	3.87	∞
Max. SAR Evaluation	4.00	R	1.73	1	1	2.31	2.31	∞
Test sample related								
Test sample positioning	5.51	N	1	1	1	5.51	5.51	47
Device holder uncertainty	2.99	N	1	1	1	2.99	2.99	5
SAR drift measurement	5.00	R	1.73	1	1	2.89	2.89	∞
SAR scaling	0.00	R	1.73	1	1	0.00	0.00	∞
Phantom and set-up								
Phantom uncertainty (shape and thickness uncertainty)	7.60	R	1.73	1	1	4.39	4.39	∞
Liquid conductivity (measured)	1.54	N	1	0.78	0.71	1.20	1.09	∞
Liquid permittivity (measured)	1.17	N	1	0.23	0.26	0.22	0.25	∞
Liquid conductivity (temperature uncertainty)	2.93	R	1.73	0.78	0.71	1.32	1.20	∞
Liquid permittivity (temperature uncertainty)	0.95	R	1.73	0.23	0.26	0.13	0.14	∞
Liquid conductivity - deviation from target	5.00	R	1.73	0.64	0.43	1.85	1.24	∞
Liquid permittivity - deviation from target	5.00	R	1.73	0.6	0.49	1.73	1.41	∞
Combined standard uncertainty		RSS				13.34	13.21	∞
Expanded uncertainty (95% confidence interval)		<i>k</i> = 2				26.68	26.42	

14. SAR Test Equipment

Manufacturer	Type / Model	S/N	Calib. Date	Calib.Interval	Calib.Due
SPEAG	ELI Phantom	-	N/A	N/A	N/A
HP	SAR System Control PC	-	N/A	N/A	N/A
Staubli	CS8Cspeag-TX90	F/20/0018446/C/001	N/A	N/A	N/A
Staubli	TX60 XLspeag	F/20/0018446/A/001	N/A	N/A	N/A
Staubli	Teach Pendant (Joystick)	D21142608A	N/A	N/A	N/A
Staubli	Light Alignment Sensor	1159	N/A	N/A	N/A
SPEAG	DAE4	1629	08/11/2020	Annual	08/11/2021
SPEAG	E-Field Probe EX3DV4	3302	05/29/2020	Annual	05/29/2021
SPEAG	Dipole D450V2	1007	05/22/2020	Annual	05/22/2021
Agilent	Power Meter E4419B	MY41291386	10/23/2020	Annual	10/23/2021
Agilent	Power Meter N1911A	MY45101406	08/31/2020	Annual	08/31/2021
Agilent	Power Sensor 8481A	SG1091286	10/05/2020	Annual	10/05/2021
Agilent	Power Sensor 8481A	MY41090873	10/05/2020	Annual	10/05/2021
Agilent	Power Sensor N1921A	MY55220026	08/31/2020	Annual	08/31/2021
SPEAG	DAK 3.5	1031	04/28/2020	Annual	04/28/2021
SPEAG	DAKS_VNA R140	0141013	04/07/2021	Annual	04/07/2022
Agilent	Signal Generator N5182A	MY47070230	05/06/2020	Annual	05/06/2021
ROHDE&SCHWARZ	Signal Generator	SMB100A	07/13/2020	Annual	07/13/2021
Agilent	11636B/Power Divider	58698	02/26/2021	Annual	02/26/2022
TESTO	175-H1/Thermometer	44606559906	01/26/2021	Annual	01/26/2022
EMPOWER	RF Power Amplifier	1084	07/01/2020	Annual	07/01/2021
MICRO LAB	LP Filter / LA-15N	10453	10/05/2020	Annual	10/05/2021
WEINSCHTEL	30dB Attenuator	CE6106	11/17/2020	Annual	11/17/2021
Apitech	Attenuator (3dB) 18B-03	1	06/04/2020	Annual	06/04/2021
Agilent	Attenuator (20dB) 33340C	18214	03/23/2021	Annual	03/23/2022
Agilent	Directional Bridge	3140A03878	06/08/2020	Annual	06/08/2021
HP	Network Analyzer 8753ES	JP39240221	01/11/2021	Annual	01/11/2022
Agilent	MXA Signal Analyzer N9020A	MY50510407	10/23/2020	Annual	10/23/2021

1. The E-field probe was calibrated by SPEAG, by the waveguide technique procedure. Dipole Verification measurement is performed by HCT Lab. before each test. The brain/body simulating material is calibrated by HCT using the DAK-12 to determine the conductivity and permittivity (dielectric constant) of the brain/body-equivalent material.

15. Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the ANSI/IEEE C95.1-2005.

These measurements are taken to simulate the RF effects exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests.

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

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Attachment 1. – SAR Test Plots

Test Laboratory: HCT CO., LTD
 EUT Type: UHF TRANSCEIVER
 Liquid Temperature: 21.2 °C
 Ambient Temperature: 21.3 °C
 Test Date: 04/08/2021
 Plot No.: 1

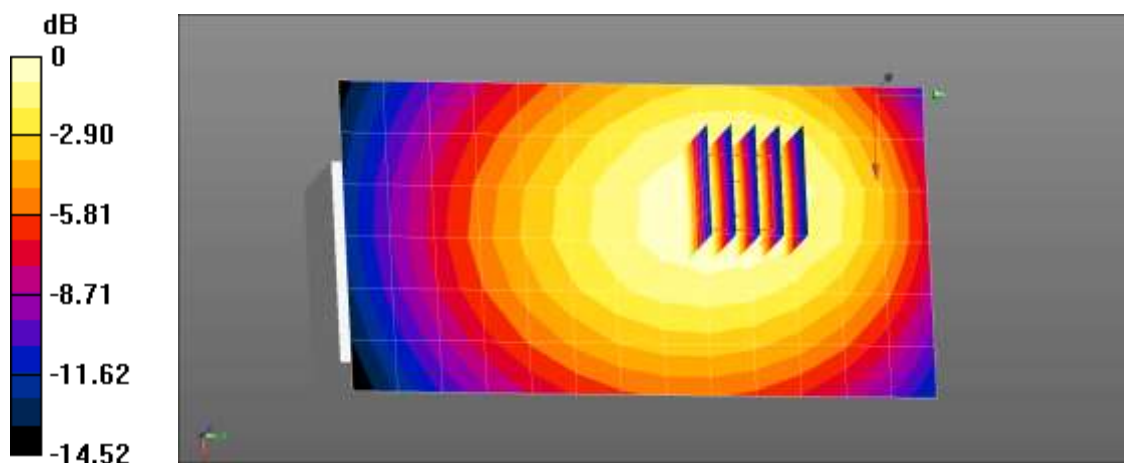
Communication System: UID 0, 450 (0); Frequency: 450.05 MHz; Duty Cycle: 1:1
 Medium parameters used (interpolated): $f = 450.05$ MHz; $\sigma = 0.851$ S/m; $\epsilon_r = 43.341$; $\rho = 1000$ kg/m³
 Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3302; ConvF(6.41, 6.41, 6.41) @ 450.05 MHz; Calibrated: 2020-05-29
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1629; Calibrated: 2020-08-11
- Phantom: ELI V4.0 (20deg probe tilt)
- Measurement SW: DASY52, Version 52.10 (4)

Head Front 1ch KNB-29N KRA-42M/Area Scan (7x14x1): Measurement grid: dx=15mm, dy=15mm
 Maximum value of SAR (measured) = 7.50 W/kg

Head Front 1ch KNB-29N KRA-42M/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
 Reference Value = 94.44 V/m; Power Drift = -0.32 dB
 Peak SAR (extrapolated) = 9.39 W/kg
SAR(1 g) = 6.66 W/kg; SAR(10 g) = 4.88 W/kg
 Maximum value of SAR (measured) = 7.47 W/kg



0 dB = 7.50 W/kg = 8.75 dBW/kg

Test Laboratory: HCT CO., LTD
 EUT Type: UHF TRANSCEIVER
 Liquid Temperature: 20.6 °C
 Ambient Temperature: 20.7 °C
 Test Date: 04/09/2021
 Plot No.: 2

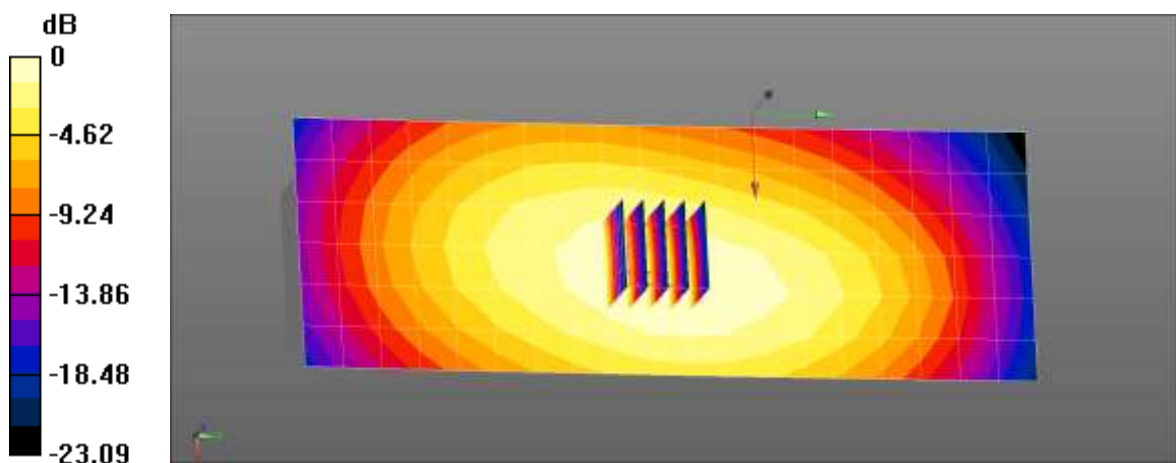
Communication System: UID 0, 450 (0); Frequency: 511.95 MHz; Duty Cycle: 1:1
 Medium parameters used (interpolated): $f = 511.95 \text{ MHz}$; $\sigma = 0.908 \text{ S/m}$; $\epsilon_r = 41.631$; $\rho = 1000 \text{ kg/m}^3$
 Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3302; ConvF(6.41, 6.41, 6.41) @ 511.95 MHz; Calibrated: 2020-05-29
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1629; Calibrated: 2020-08-11
- Phantom: ELI V4.0 (20deg probe tilt)
- Measurement SW: DASY52, Version 52.10 (4)

Body Rear 5ch KNB-29N KRA-27M2/Area Scan (7x20x1): Measurement grid: $dx=15\text{mm}$, $dy=15\text{mm}$
 Maximum value of SAR (measured) = 9.66 W/kg

Body Rear 5ch KNB-29N KRA-27M2/Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$
 Reference Value = 107.2 V/m; Power Drift = -0.31 dB
 Peak SAR (extrapolated) = 13.1 W/kg
SAR(1 g) = 8.65 W/kg; SAR(10 g) = 6.07 W/kg
 Maximum value of SAR (measured) = 9.79 W/kg



0 dB = 9.66 W/kg = 9.85 dBW/kg

Attachment 2. – Dipole Verification Plots

■ Verification Data (450 MHz Head)

Test Laboratory: HCT CO., LTD
 Input Power 50 mW
 Liquid Temp: 21.2 °C
 Test Date: 04/08/2021

DUT: Dipole 450 MHz D450V2; Type: D450V2;

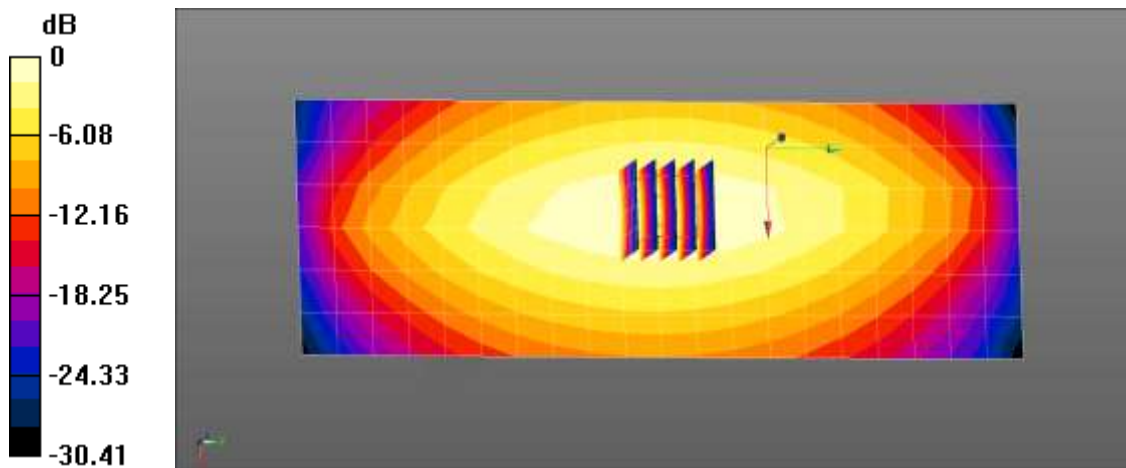
Communication System: UID 0, CW (0); Frequency: 450 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 450 \text{ MHz}$; $\sigma = 0.851 \text{ S/m}$; $\epsilon_r = 43.343$; $\rho = 1000 \text{ kg/m}^3$
 Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3302; ConvF(6.41, 6.41, 6.41) @ 450 MHz; Calibrated: 2020-05-29
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1629; Calibrated: 2020-08-11
- Phantom: ELI V4.0 (20deg probe tilt)
- Measurement SW: DASY52, Version 52.10 (4)

450MHz Head Verification/Area Scan (7x21x1): Measurement grid: $dx=15\text{mm}$, $dy=15\text{mm}$
 Maximum value of SAR (measured) = 0.267 W/kg

450MHz Head Verification/Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$
 Reference Value = 18.33 V/m; Power Drift = 0.06 dB
 Peak SAR (extrapolated) = 0.382 W/kg
SAR(1 g) = 0.243 W/kg; SAR(10 g) = 0.162 W/kg
 Maximum value of SAR (measured) = 0.283 W/kg



0 dB = 0.267 W/kg = -5.73 dBW/kg

■ Verification Data (450 MHz Head)

Test Laboratory: HCT CO., LTD
 Input Power: 50 mW
 Liquid Temp: 20.6 °C
 Test Date: 04/09/2021

DUT: Dipole 450 MHz D450V2; Type: D450V2;

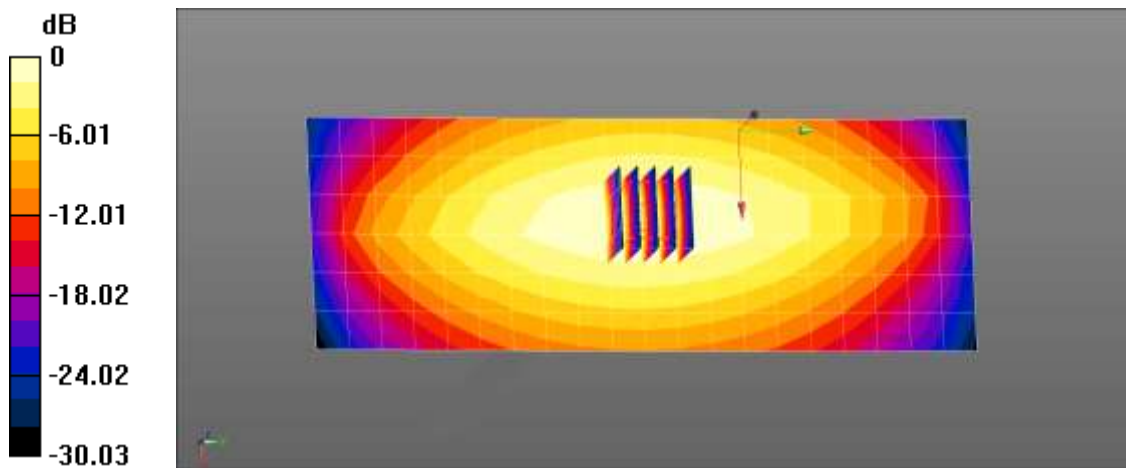
Communication System: UID 0, CW (0); Frequency: 450 MHz; Duty Cycle: 1:1
 Medium parameters used: $f = 450 \text{ MHz}$; $\sigma = 0.851 \text{ S/m}$; $\epsilon_r = 43.333$; $\rho = 1000 \text{ kg/m}^3$
 Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3302; ConvF(6.41, 6.41, 6.41) @ 450 MHz; Calibrated: 2020-05-29
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1629; Calibrated: 2020-08-11
- Phantom: ELI V4.0 (20deg probe tilt)
- Measurement SW: DASY52, Version 52.10 (4)

450MHz Body Verification/Area Scan (7x21x1): Measurement grid: $dx=15\text{mm}$, $dy=15\text{mm}$
 Maximum value of SAR (measured) = 0.268 W/kg

450MHz Body Verification/Zoom Scan (5x5x7)/Cube 0: Measurement grid: $dx=8\text{mm}$, $dy=8\text{mm}$, $dz=5\text{mm}$
 Reference Value = 18.38 V/m; Power Drift = -0.01 dB
 Peak SAR (extrapolated) = 0.383 W/kg
SAR(1 g) = 0.244 W/kg; SAR(10 g) = 0.163 W/kg
 Maximum value of SAR (measured) = 0.285 W/kg



0 dB = 0.268 W/kg = -5.72 dBW/kg

Attachment 3. – SAR Tissue Characterization

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

Ingredients (% by weight)	Frequency (MHz)
	450
Tissue Type	Head
Water	38.91 %
Salt (NaCl)	3.79 %
Sugar	56.93 %
HEC	0.25 %
Bactericide	0.12 %
Triton X-100	-
DGBE	-
Diethylene glycol hexyl ether	-

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

Composition of the Tissue Equivalent Matter

Attachment 4. – SAR System Validation

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

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

SAR System No.	Probe	Probe Type	Probe Calibration Point		Dipole	Date	Dielectric Parameters		CW Validation			Modulation Validation		
							Measured Permittivity	Measured Conductivity	Sensitivity	Probe Linearity	Probe Isotropy	MOD. Type	Duty Factor	PAR
8	3302	ES3DV3	Head	450	1007	2021-04-07	43.3	0.85	PASS	PASS	PASS	N/A	N/A	N/A

SAR System Validation Summary 1g

Note;

All measurement were performed using probes calibrated for CW signal only. Modulations in the table above represent test configurations for which the measurement system has been validated per FCC KDB Publication 865664 D01v01r04. SAR system were validated for modulated signals with a periodic duty cycle, such as GMSK, or with a high peak to average ratio (>5 dB), such as OFDM according to KDB 865664 D01v01r04.

Attachment 5. – Probe Calibration Data

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Multilateral Agreement for the recognition of calibration certificates

Accreditation No.: **SCS 0108**

Client **KCTL (Dymstec)**

Certificate No: **ES3-3302_May20**

CALIBRATION CERTIFICATE

Object **ES3DV3 - SN:3302**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-12.v9, QA CAL-23.v5, QA CAL-25.v7
Calibration procedure for dosimetric E-field probes**



Calibration date: **May 29, 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 $(22 \pm 3)^{\circ}\text{C}$ and humidity $< 70\%$.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104776	01-Apr-20 (No. 217-03100/03101)	Apr-21
Power sensor NRP-Z91	SN: 103244	01-Apr-20 (No. 217-03100)	Apr-21
Power sensor NRP-Z91	SN: 103245	01-Apr-20 (No. 217-03101)	Apr-21
Reference 20 dB Attenuator	SN: CC2552 (20x)	31-Mar-20 (No. 217-03106)	Apr-21
DAE4	SN: 660	27-Dec-19 (No. DAE4-660_Dec19)	Dec-20
Reference Probe ES3DV2	SN: 3013	31-Dec-19 (No. ES3-3013_Dec19)	Dec-20
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
RF generator HP 8648C	SN: US3642UD1700	04-Aug-99 (in house check Jun-18)	In house check: Jun-20
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-19)	In house check: Oct-20

Calibrated by:	Name Claudio Leubler	Function Laboratory Technician	Signature 
Approved by:	Katja Pokovic	Technical Manager	
This calibration certificate shall not be reproduced except in full without written approval of the laboratory.			Issued: June 1, 2020

Certificate No: ES3-3302_May20

Page 1 of 9

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Accreditation No.: **SCS 0108**

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), i.e., $\vartheta = 0$ 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 $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not affect 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 with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; D_{x,y,z}; VR_{x,y,z}**: A, B, C, D are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ 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 values 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).

ES3DV3 – SN:3302

May 29, 2020

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3302

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	1.25	1.35	1.21	$\pm 10.1 \%$
DCP (mV) ^B	102.6	101.6	104.9	

Calibration Results for Modulation Response

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Max dev.	Unc ^C (k=2)
0	CW	X	0.0	0.0	1.0	0.00	210.3	$\pm 3.5 \%$	$\pm 4.7 \%$
		Y	0.0	0.0	1.0		224.7		
		Z	0.0	0.0	1.0		213.2		

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 E²-field uncertainty inside TSL (see Page 5).

^B Numerical linearization parameter: uncertainty not required.

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

ES3DV3- SN:3302

May 29, 2020

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3302**Other Probe Parameters**

Sensor Arrangement	Triangular
Connector Angle (°)	74.2
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	10 mm
Tip Diameter	4 mm
Probe Tip to Sensor X Calibration Point	2 mm
Probe Tip to Sensor Y Calibration Point	2 mm
Probe Tip to Sensor Z Calibration Point	2 mm
Recommended Measurement Distance from Surface	3 mm

ES3DV3- SN:3302

May 29, 2020

DASY/EASY - Parameters of Probe: ES3DV3 - SN:3302

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) ^c	Relative Permittivity ^f	Conductivity (S/m) ^f	ConvF X	ConvF Y	ConvF Z	Alpha ^g	Depth ^g (mm)	Unc (k=2)
300	45.3	0.87	6.75	6.75	6.75	0.11	1.30	± 13.3 %
450	43.5	0.87	6.41	6.41	6.41	0.17	1.45	± 13.3 %
1640	40.2	1.31	5.08	5.08	5.08	0.44	1.52	± 12.0 %
2000	40.0	1.40	4.81	4.81	4.81	0.50	1.45	± 12.0 %

^c Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Validity of ConvF assessed at 6 MHz is 4-9 MHz, and ConvF assessed at 13 MHz is 9-19 MHz. Above 5 GHz frequency validity can be extended to ± 110 MHz.

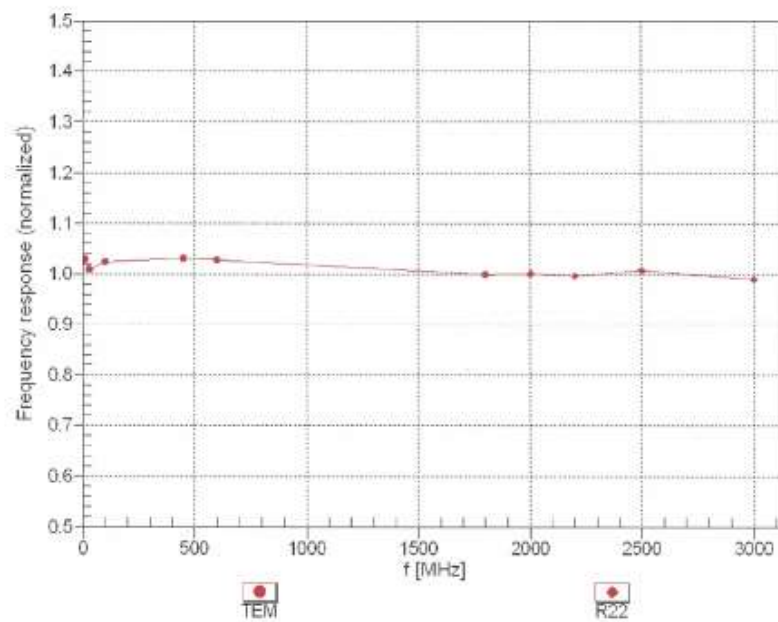
^f At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty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

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

ES3DV3- SN:3302

May 29, 2020

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

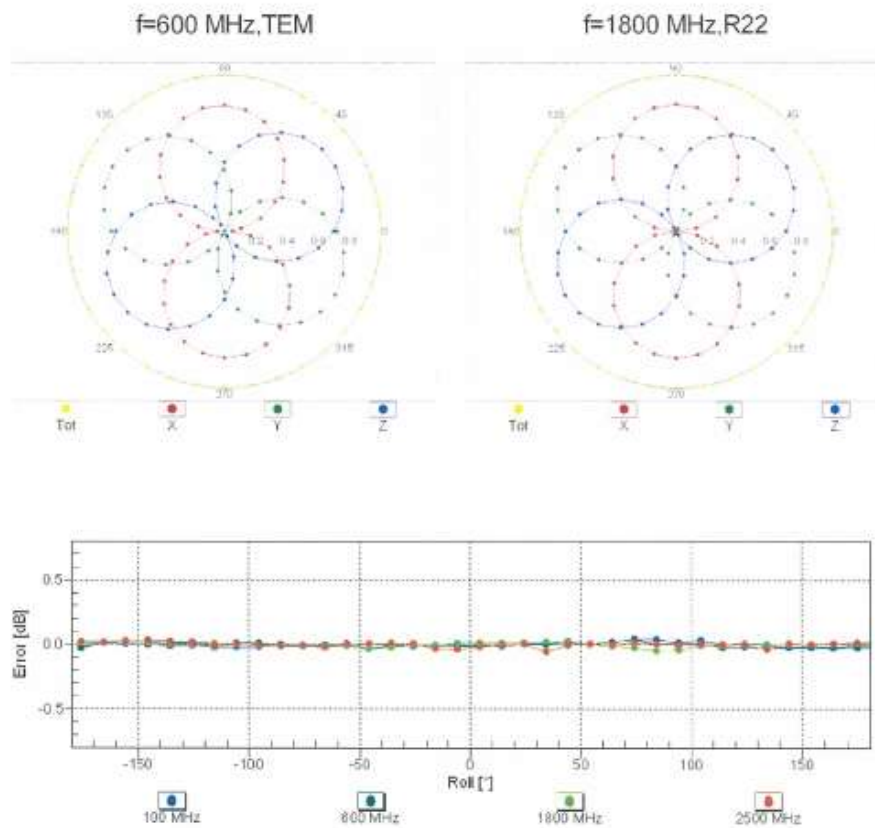


Uncertainty of Frequency Response of E-field: $\pm 6.3\%$ ($k=2$)

ES3DV3-- SN:3302

May 29, 2020

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

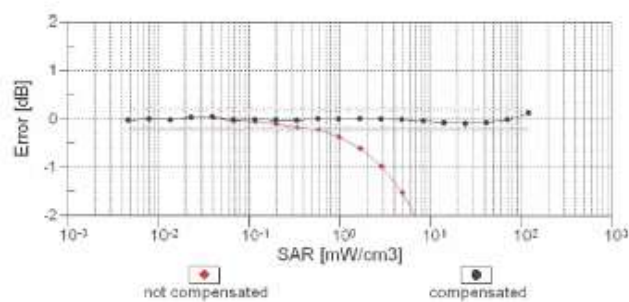
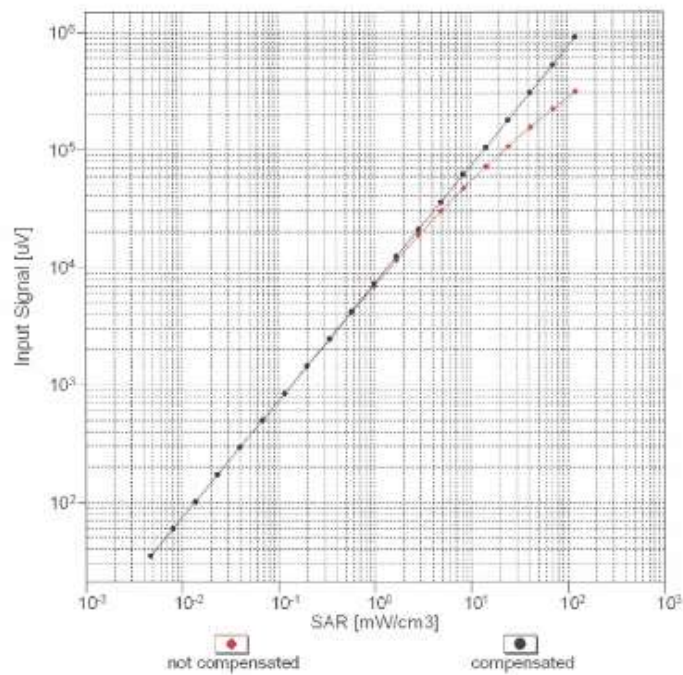


Uncertainty of Axial Isotropy Assessment: $\pm 0.5\%$ ($k=2$)

ES3DV3- SN:3302

May 29, 2020

Dynamic Range f(SAR_{head}) (TEM cell , f_{eval}= 1900 MHz)

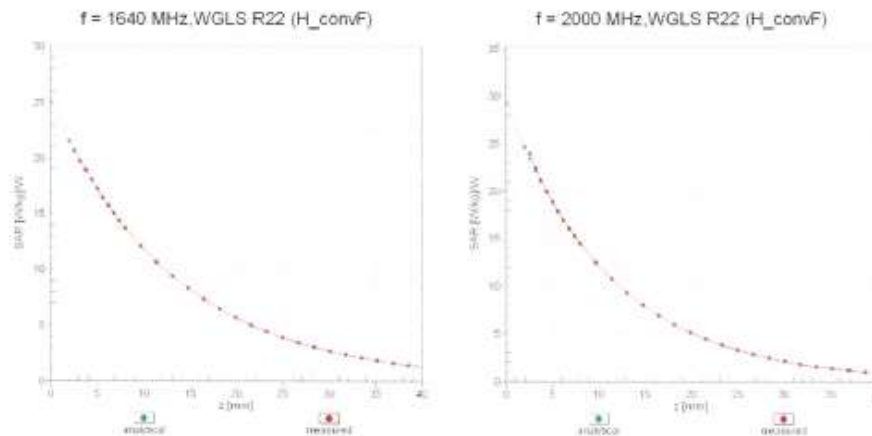


Uncertainty of Linearity Assessment: $\pm 0.6\%$ (k=2)

ES3DV3- SN:3302

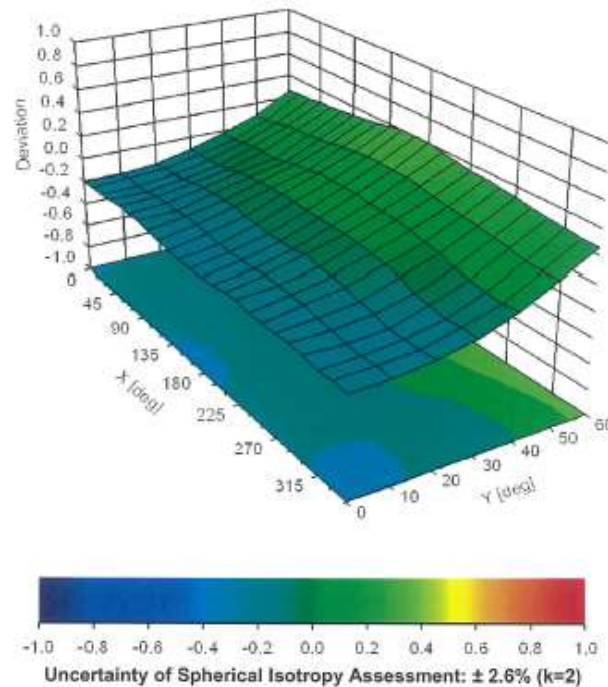
May 29, 2020

Conversion Factor Assessment



Deviation from Isotropy in Liquid

Error (ϕ, θ), $f = 900 \text{ MHz}$



Attachment 6. – Dipole Calibration Data

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Accreditation No.: **SCS 0108**

Client **HCT (Dymstec)**

Certificate No: **D450V2-1007_May20**

CALIBRATION CERTIFICATE

Object **D450V2 - SN: 1007**

Calibration procedure(s) **QA CAL-15.v9
Calibration Procedure for SAR Validation Sources below 700 MHz**

Calibration date: **May 22, 2020**

결	담당자	확인자
재	<i>[Signature]</i>	<i>[Signature]</i>
취위/상명	SW 12/10/20	SW 12/15/20
일자	2020 1 6 16	2020 1 6 16

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 $(22 \pm 3)^\circ\text{C}$ and humidity $< 70\%$.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	01-Apr-20 (No. 217-03100/03101)	Apr-21
Power sensor NRP-Z91	SN: 103244	01-Apr-20 (No. 217-03100)	Apr-21
Power sensor NRP-Z91	SN: 103245	01-Apr-20 (No. 217-03101)	Apr-21
Reference 20 dB Attenuator	SN: CC2552 (20x)	31-Mar-20 (No. 217-03105)	Apr-21
Type-N mismatch combination	SN: 310982 / 06327	31-Mar-20 (No. 217-03104)	Apr-21
Reference Probe EX3DV4	SN: 3877	31-Dec-19 (No. EX3-3877_Dec19)	Dec-20
DAE4	SN: 654	27-Jun-19 (No. DAE4-654_Jun19)	Jun-20
Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-18)	In house check: Jun-20
Network Analyzer Agilent E8358A	SN: US41060477	31-Mar-14 (in house check Oct-19)	In house check: Oct-20

Calibrated by: **Jeton Kasrati** **Laboratory Technician** *[Signature]*

Approved by: **Katja Pokovic** **Technical Manager** *[Signature]*

Issued: May 22, 2020

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

Certificate No: D450V2-1007_May20

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Accreditation No.: **SCS 0108**

Glossary:

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

Calibration is Performed According to the Following Standards:

- 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"

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%.

Measurement Conditions

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

DASY Version	DASY5	V52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Flat Phantom V4.4	Shell thickness: 6 ± 0.2 mm
Distance Dipole Center - TSL	15 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	450 MHz \pm 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	43.5	0.87 mho/m
Measured Head TSL parameters	(22.0 \pm 0.2) °C	43.4 \pm 6 %	0.87 mho/m \pm 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	1.19 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	4.76 W/kg \pm 18.1 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	0.796 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	3.18 W/kg \pm 17.6 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)

Antenna Parameters with Head TSL

Impedance, transformed to feed point	55.4 Ω - 8.6 $\mu\Omega$
Return Loss	- 20.4 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.390 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: 22.05.2020

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 450 MHz; Type: D450V2; Serial: D450V2 - SN: 1007

Communication System: UID 0 - CW; Frequency: 450 MHz

Medium parameters used: $f = 450 \text{ MHz}$; $\sigma = 0.87 \text{ S/m}$; $\epsilon_r = 43.4$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN3877; ConvF(10.58, 10.58, 10.58) @ 450 MHz; Calibrated: 31.12.2019
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn654; Calibrated: 27.06.2019
- Phantom: Flat Phantom 4.4 ; Type: Flat Phantom 4.4; Serial: 1002
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

Dipole Calibration for Head Tissue/ $d=15\text{mm}$, $\text{Pin}=250\text{mW}$ /Zoom Scan (7x7x7)/Cube 0:

Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$

Reference Value = 44.12 V/m; Power Drift = -0.04 dB

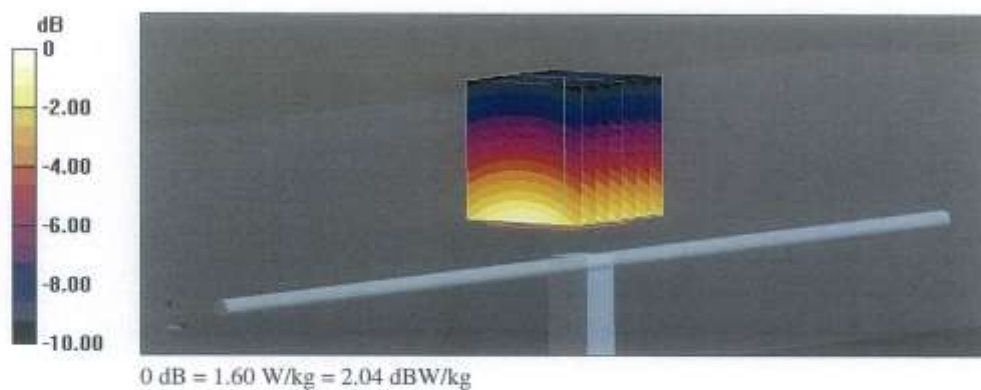
Peak SAR (extrapolated) = 1.84 W/kg

SAR(1 g) = 1.19 W/kg; SAR(10 g) = 0.796 W/kg

Smallest distance from peaks to all points 3 dB below: Larger than measurement grid (>30 mm)

Ratio of SAR at M2 to SAR at M1 = 64.9%

Maximum value of SAR (measured) = 1.60 W/kg



Impedance Measurement Plot for Head TSL

