



SAR TEST REPORT

Applicant Alliedstar Medical Equipment Co., Ltd.
FCC ID 2A8SG-AS200E
Product Intraoral Scanner
Brand AlliedStar
Model AS 200E
Report No. R2203A0251-S1V1
Issue Date November 8, 2022

TA Technology (Shanghai) Co., Ltd. tested the above equipment in accordance with the requirements in **IEEE 1528-2013, ANSI C95.1: 1992, IEEE C95.1: 1991**. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

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Table of Contents

1	Test Laboratory.....	4
1.1	Notes of the Test Report	4
1.2	Test facility	4
1.3	Testing Location.....	4
1.4	Laboratory Environment.....	5
2	Statement of Compliance	6
3	Description of Equipment under Test.....	7
4	Test Specification, Methods and Procedures	9
5	Operational Conditions during Test	10
5.1	Test Positions.....	10
5.1.1	Body Worn Configuration.....	10
5.2	Measurement Variability.....	11
5.3	Test Configuration.....	12
5.3.1	Wi-Fi Test Configuration	12
6	SAR Measurements System Configuration	14
6.1	SAR Measurement Set-up	14
6.2	DASY5 E-field Probe System.....	15
6.3	SAR Measurement Procedure	16
7	Main Test Equipment.....	18
8	Tissue Dielectric Parameter Measurements & System Verification	19
8.1	Tissue Verification	19
8.2	System Performance Check.....	21
8.3	SAR System Validation	24
9	Normal and Maximum Output Power	25
9.1	WLAN Mode.....	25
10	Measured and Reported (Scaled) SAR Results	27
10.1	EUT Antenna Locations	27
10.2	Measured SAR Results.....	28
11	Measurement Uncertainty	29
	ANNEX A: Test Layout.....	30
	ANNEX B: System Check Results.....	32
	ANNEX C: Highest Graph Results.....	34
	ANNEX D: Probe Calibration Certificate (SN: 7543).....	36
	ANNEX E: D5GHzV2 Dipole Calibration Certificate	45
	ANNEX F: DAE4 Calibration Certificate (SN: 1291)	59
	ANNEX G: The EUT Appearance	62
	ANNEX H: Test Setup Photos.....	63



Version	Revision description	Issue Date
Rev.0	Initial issue of report.	October 13, 2022
Rev.1	Update information and description.	November 8, 2022
Note: This revised report (Report No. R2203A0251-S1V1) supersedes and replaces the previously issued report (Report No. R2203A0251-S1). Please discard or destroy the previously issued report and dispose of it accordingly.		



1 Test Laboratory

1.1 Notes of the Test Report

This report shall not be reproduced in full or partial, without the written approval of **TA technology (shanghai) co., Ltd.** The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein .Measurement Uncertainties were not taken into account and are published for informational purposes only. This report is written to support regulatory compliance of the applicable standards stated above.

1.2 Test facility

FCC (Designation number: CN1179, Test Firm Registration Number: 446626)

TA Technology (Shanghai) Co., Ltd. has been listed on the US Federal Communications Commission list of test facilities recognized to perform measurements.

A2LA (Certificate Number: 3857.01)

TA Technology (Shanghai) Co., Ltd. has been listed by American Association for Laboratory Accreditation to perform measurement.

1.3 Testing Location

Company: TA Technology (Shanghai) Co., Ltd.
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1.4 Laboratory Environment

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



2 Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for the EUT are as follows:

Table 1: Highest Reported SAR

Mode	Highest Reported SAR (W/kg)	
	1g SAR Body (Separation 0mm)	Product Specific 10g SAR (Separation 0mm)
Wi-Fi (5G)	<0.1	0.512
Date of Testing: July 29, 2022		
Date of Sample Received: December 6, 2021		
Note:		
1. The device is in compliance with SAR for Uncontrolled Environment /General Population exposure limits (1.6 W/kg and 4.0 W/kg) specified in ANSI C95.1: 1992/IEEE C95.1: 1991, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013.		
2. All indications of Pass/Fail in this report are opinions expressed by TA Technology (Shanghai) Co., Ltd. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only.		

3 Description of Equipment under Test

Client Information

Applicant	Alliedstar Medical Equipment Co., Ltd.
Applicant address	No.1-4, Floor 3, Unit 2, Building 3, No.222, West third section,Waihuan Road, Yanjiang District, Ziyang, 641300, Sichuan, P.R. China
Manufacturer	Alliedstar Medical Equipment Co., Ltd.
Manufacturer address	No.1-4, Floor 3, Unit 2, Building 3, No.222, West third section,Waihuan Road, Yanjiang District, Ziyang, 641300, Sichuan, P.R. China

General Technologies

Application Purpose	Original Grant
EUT Stage	Identical Prototype
Model	AS 200E
SN	EM103
Hardware Version	E
Software Version	1.0.22.1
Antenna Type	Internal Antenna
Device Class	C
EUT Accessory	
Battery	Manufacturer: SHENZHEN RYDER ELECTRONICS CO., LTD. Model: Li-18650-3.6V 3500mAh-PCM-Cap
Note: The EUT is sent from the applicant to TA and the information of the EUT is declared by the applicant.	

**Wireless Technology and Frequency Range**

Wireless Technology		Modulation	Operating mode	Tx (MHz)
Wi-Fi	5G	OFDM	802.11a/n HT20/ HT40/ ac VHT20/ VHT40/ VHT80	5150 ~ 5250 5725 ~ 5850
	Does this device support MIMO ☐ Yes ☒ No			



4 Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE 1528- 2013, ANSI C95.1: 1992, IEEE C95.1: 1991, the following FCC Published RF exposure KDB procedures:

Reference Standards

KDB 248227 D01 802.11Wi-Fi SAR v02r02

KDB 447498 D01 General RF Exposure Guidance v06

KDB 648474 D04 Handset SAR v01r03

KDB 690783 D01 SAR Listings on Grants v01r03

KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04

KDB 865664 D02 RF Exposure Reporting v01r02

5 Operational Conditions during Test

5.1 Test Positions

5.1.1 Body Worn Configuration

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations.

Per FCC KDB Publication 648474 D04, Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in FCC KDB Publication 447498 D04 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for a body-worn accessory, measured without a headset connected to the handset, is $> 1.2 \text{ W/kg}$, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a headset attached to the handset.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do 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 the device with each accessory. If multiple accessories 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. Test position spacing was documented. 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 in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device and positioned against a flat phantom in a normal use configuration.

5.2 Measurement Variability

Per FCC KDB Publication 865664 D01, SAR measurement variability was assessed for each frequency band, which was determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media were required for SAR measurements in a frequency band, the variability measurement procedures were applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. These additional measurements were repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device was returned to ambient conditions (normal room temperature) with the battery fully charged before it was re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR Measurement Variability was assessed using the following procedures for each frequency band:

- 1) When the original highest measured SAR is ≥ 0.80 W/kg, the measurement was repeated once.
- 2) A second repeated measurement was performed only if the ratio of largest to smallest SAR for the original and first repeated measurements was > 1.20 or when the original or repeated measurement was ≥ 1.45 W/kg ($\sim 10\%$ from the 1-g SAR limit).
- 3) A third repeated measurement was performed only if the original, first or second repeated measurement was ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .
- 4) Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg

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

5.3 Test Configuration

5.3.1 Wi-Fi Test Configuration

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; These are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the *initial test position(s)* by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The *initial test position(s)* is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the *reported SAR* for the *initial test position* is:

- ≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- 0.4 W/kg, SAR is repeated using the same wireless mode test configuration tested in the *initial test position* to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the *reported SAR* is ≤ 0.8 W/kg or all required test positions are tested.
 - ✧ For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
 - ✧ When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the *initial test position* and subsequent test positions, when the *reported SAR* is > 0.8 W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the *reported SAR* is ≤ 1.2 W/kg or all required test channels are considered.
 - ✧ The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.

To determine the initial test position, Area Scans were performed to determine the position with the Maximum Value of SAR (measured). The position that produced the highest Maximum Value of SAR is considered the worst case position; thus used as the initial test position.

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel

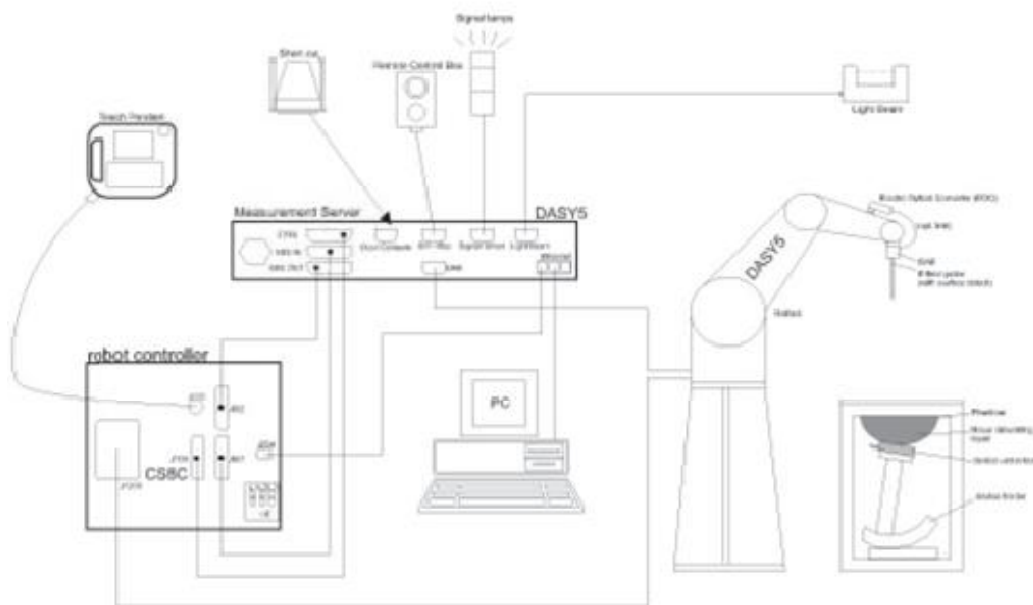


bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement.

6 SAR Measurements System Configuration

6.1 SAR Measurement Set-up

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

6.2 DASY5 E-field Probe System

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation.

EX3DV4 Probe Specification

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 μ W/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure Scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.



E-field Probe Calibration

Each probe is calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy was evaluated and found to be better than ± 0.25 dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a wave guide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$\text{SAR} = C \Delta T / \Delta t$$

Where: Δt = Exposure time (30 seconds),

C = Heat capacity of tissue (brain or muscle),

ΔT = Temperature increase due to RF exposure.

Or

$$\text{SAR} = I E I^2 \sigma / \rho$$

Where: σ = Simulated tissue conductivity,

ρ = Tissue density (kg/m^3).

6.3 SAR Measurement Procedure

Power Reference Measurement

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.

Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	≤ 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 $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Zoom Scan

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the zoom scan evaluates the averaged SAR for 1 gram and 10 gram and displays these values next to the job's label.

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

			≤3GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{\text{zoom}}\Delta y_{\text{zoom}}$			≤2GHz: ≤8mm 2 – 3GHz: ≤5mm*	3 – 4GHz: ≤5mm* 4 – 6GHz: ≤4mm*
Maximum zoom scan spatial resolution, normal to phantom surface	Uniform grid: $\Delta z_{\text{zoom}}(n)$		≤5mm	3 – 4GHz: ≤4mm 4 – 5GHz: ≤3mm 5 – 6GHz: ≤2mm
	Graded grid	$\Delta z_{\text{zoom}}(1)$: between 1 st two points closest to phantom surface	≤4mm	3 – 4GHz: ≤3mm 4 – 5GHz: ≤2.5mm 5 – 6GHz: ≤2mm
		$\Delta z_{\text{zoom}}(n>1)$: between subsequent points	≤1.5• $\Delta z_{\text{zoom}}(n-1)$	
Minimum zoom scan volume	X, y, z		≥30mm	3 – 4GHz: ≥28mm 4 – 5GHz: ≥25mm 5 – 6GHz: ≥22mm
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 <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is ≤ 1.4W/kg, ≤8mm, ≤7mm and ≤5mm zoom scan resolution may be applied, respectively, for 2GHz to 3GHz, 3GHz to 4GHz and 4GHz to 6GHz.				

Volume Scan Procedures

The volume scan is used to assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY 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 dB. If the power drifts more than 5%, the SAR will be retested.

7 Main Test Equipment

Name of Equipment	Manufacturer	Type/Model	Serial Number	Last Cal.	Cal. Due Date
Network analyzer	Agilent	E5071B	MY42404014	2022-05-14	2023-05-13
Dielectric Probe Kit	Agilent	85070E	US44020115	/	/
Power meter	Agilent	E4417A	GB41291714	2022-05-14	2023-05-13
Power sensor	Agilent	N8481H	MY50350004	2022-05-14	2023-05-13
Power sensor	Agilent	E9327A	US40441622	2022-05-14	2023-05-13
Power sensor	Agilent	NRP18S	101955	2022-05-14	2023-05-13
Signal Generator	Agilent	N5181A	MY50140143	2022-05-14	2023-05-13
Dual directional coupler	UCL	UCL-DDC0 56G-S	20010600118	/	/
Amplifier	INDEXSAR	TPA-005060 G01	13030502	2022-05-14	2023-05-13
E-field Probe	SPEAG	EX3DV4	7543	2021-12-28	2022-12-27
DAE	SPEAG	DAE4	1291	2022-03-24	2023-03-23
Validation Kit 5GHz	SPEAG	D5GHzV2	1151	2020-02-27	2023-02-26
Software for Tissue	Agilent	85070	/	/	/
Temperature Probe	Tianjin jinming	JM222	381	2022-05-14	2023-05-13
Twin SAM Phantom	SPEAG	SAM1	1667	/	/
Hygrothermograph	Anymetr	HTC - 1	TY2020A003	2022-05-14	2023-05-13
TX90 XL	SPEAG	Staubli TX90 XL	/	/	/
Software for Test	SPEAG	DASY52	52.10.4.1527	/	/

8 Tissue Dielectric Parameter Measurements & System Verification

8.1 Tissue Verification

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ of the temperature when the tissue parameters are characterized. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 24 hours of use; or earlier if the dielectric parameters can become out of tolerance.

Target values

Frequency (MHz)	ϵ_r	$\sigma(\text{s/m})$
5250	35.9	4.71
5750	35.4	5.22

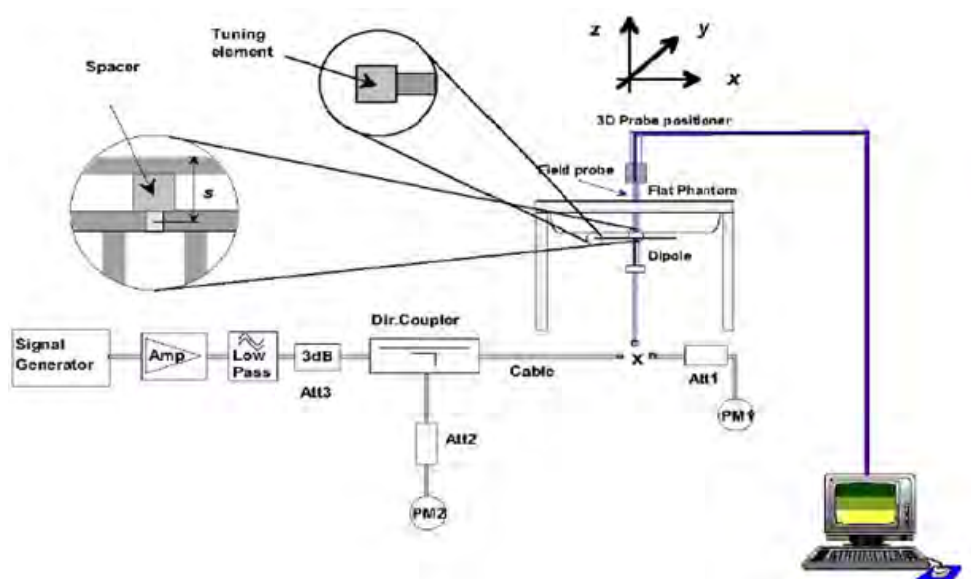
Measurements results

Frequency (MHz)	Test Date	Temp ℃	Measured Dielectric Parameters		Target Dielectric Parameters		Limit (Within ±5%)	
			ϵ_r	σ (s/m)	ϵ_r	σ (s/m)	Dev ϵ_r (%)	Dev σ (%)
5250	2022/7/29	21.5	35.5	4.80	35.9	4.71	-1.11	1.91
5750	2022/7/29	21.5	34.9	5.21	35.4	5.22	-1.41	-0.19
Note: The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.								

8.2 System Performance Check

The manufacturer calibrates the probes annually. Dielectric parameters of the tissue simulates were measured using the dielectric probe kit and the network analyzer. A system check measurement for every day was made following the determination of the dielectric parameters of the Tissue simulates, using the dipole validation kit. The dipole antenna was placed under the flat section of the twin SAM phantom.

System check is performed regularly on all frequency bands where tests are performed with the DASY system.



Picture 1 System Performance Check setup



Picture 2 Setup Photo

Justification for Extended SAR Dipole Calibrations

Usage of SAR dipoles calibrated less than 3 years ago but more than 1 year ago were confirmed in maintaining return loss (< -20 dB, within 20% of prior calibration) and impedance (within 5 ohm from prior calibration) requirements per extended calibrations in KDB 865664 D01:

Dipole		Date of Measurement	Return Loss (dB)	Δ %	Impedance (Ω)			
					Real	$\Delta\Omega$	Imaginary	$\Delta\Omega$
Dipole D5GHzV2 SN: 1151 (5250MHz)	Head Liquid	2/27/2020	23.4	/	52.4	/	-6.47	/
		2/26/2021	23.8	1.7	50.0	-2.4	-6.31	0.16
		2/25/2022	23.9	0.4	49.3	-0.7	-6.42	-0.11
Dipole D5GHzV2 SN: 1151 (5750MHz)	Head Liquid	2/27/2020	25.0	/	55.9	/	0.16	/
		2/26/2021	26.8	-1.8	52.5	-3.4	0.15	-0.01
		2/25/2022	27.1	1.1	52.1	-0.4	0.16	0.01

System Check results

Frequency (MHz)	Test Date	Temp °C	100mW Measured SAR _{1g} (W/kg)	1W Normalized SAR _{1g} (W/kg)	1W Target SAR _{1g} (W/kg)	Δ % (Limit ±10%)	Plot No.
5250	2022/7/29	21.5	7.87	78.70	78.00	0.90	1
5750	2022/7/29	21.5	7.66	76.60	77.40	-1.03	2
Note: Target Values used derive from the calibration certificate Data Storage and Evaluation.							

Frequency (MHz)	Test Date	Temp °C	100mW Measured SAR _{10g}	1W Normalized SAR _{10g} (W/kg)	1W Target SAR _{10g} (W/kg)	Limit (±10%)	Plot No.
5250	2022/7/29	21.5	2.25	22.50	22.30	0.90	1
5750	2022/7/29	21.5	2.27	22.70	21.90	3.65	2
Note: Target Values used derive from the calibration certificate Data Storage and Evaluation.							

8.3 SAR System Validation

Per FCC KDB 865664 D02v01, SAR system verification is required 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 are used with the required tissue-equivalent media for system validation, according to the procedures outlined in FCC KDB 865664 D01 and IEEE 1528-2013. Since SAR probe calibrations are frequency dependent, each probe calibration point must be 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, measurement frequencies, SAR probes, calibrated signal type(s) and tissue dielectric parameters has been included.

Frequency [MHz]	Date	Probe SN	Probe Type	Probe Cal Point		PERM (Er)	COND (Σ)	CW Validation		
								Sensitivity	Probe Linearity	Probe Isotropy
5250	2022/12/28	7543	EX3DV4	5250	Head	35.9	4.71	PASS	PASS	PASS
5750	2022/12/28	7543	EX3DV4	5750	Head	35.4	5.22	PASS	PASS	PASS

NOTE: While the probes have been calibrated for both CW and modulated signals, all measurements were performed using communication systems calibrated for CW signals only. Modulations in the table above represent test configurations for which the measurement system has been validated per FCC KDB Publication 865664D01v01 for scenarios when CW probe calibrations are used with other signal types. SAR systems were validated for modulated signals with a periodic duty cycle, such as GMSK, or with a high peak to average ratio (>5dB), such as OFDM according to KDB 865664.

9 Normal and Maximum Output Power

KDB 447498 D04 at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.

9.1 WLAN Mode

Wi-Fi 5G (U-NII-1)	Channel /Frequency(MHz)	Maximum Output Power (dBm)	
		Tune-up	Meas.
Mode			
802.11a (6M)	36/5180	15.00	13.72
	40/5200	15.00	13.66
	44/5220	15.00	14.22
	48/5240	15.00	14.26
802.11n-HT20 (MCS0)	36/5180	15.00	13.99
	40/5200	15.00	12.93
	44/5220	15.00	13.90
	48/5240	15.00	12.80
802.11n-HT40 (MCS0)	38/5190	15.00	12.40
	46/5230	15.00	12.58
802.11ac-VHT20 (MCS0)	36/5180	15.00	14.09
	40/5200	15.00	12.59
	44/5220	15.00	12.37
	48/5240	15.00	13.12
802.11ac-VHT40 (MCS0)	38/5190	15.00	9.39
	46/5230	15.00	11.96
802.11ac-VHT80 (MCS0)	42/5210	12.00	10.61
Note. Initial test configuration is 802.11a mode, since the highest maximum output power.			



Wi-Fi 5G (U-NII-3)	Channel /Frequency(MHz)	Maximum Output Power (dBm)	
		Tune-up	Meas.
Mode			
802.11a (6M)	149/5745	11.00	9.70
	157/5785	11.00	10.49
	165/5825	11.00	10.07
802.11n-HT20 (MCS0)	149/5745	11.00	10.45
	157/5785	11.00	10.44
	165/5825	11.00	10.41
802.11n-HT40 (MCS0)	151/5755	11.00	10.47
	159/5795	11.00	10.45
802.11ac-VHT20 (MCS0)	149/5745	11.00	10.08
	157/5785	11.00	10.40
	165/5825	11.00	10.27
802.11ac-VHT40 (MCS0)	151/5755	11.00	10.06
	159/5795	11.00	9.71
802.11ac-VHT80 (MCS0)	155/5775	6.00	3.97
Note. Initial test configuration is 802.11a mode, since the highest maximum output power.			

10 Measured and Reported (Scaled) SAR Results

10.1 EUT Antenna Locations

The Detailed Antenna Locations refer to *Antenna Locations*.

Overall (Length x Width): 247mm x 47.6 mm						
Distance of the Antenna to the EUT surface/edge						
Antenna	Back Side	Front side	Left Edge	Right Edge	Top Edge	Bottom Edge
Wi-Fi Antenna	<25mm	<25mm	<25mm	>25mm	>25mm	>25mm
Positions for SAR tests						
Antenna	Back Side	Front side	Left Edge	Right Edge	Top Edge	Bottom Edge
Wi-Fi Antenna	Yes	Yes	Yes	N/A	N/A	N/A
Note: 1. SAR is measured for all sides and surfaces with a transmitting antenna located within 25 mm from that surface or edge. 2. The other Frequencies were measured at the worst position 3. The SAR test shall be performed at the mid-band or highest output power channel of each operating mode for each exposure position, and when the reported 10-g SAR is 3.0 dB lower than the SAR limit, testing of other required channels within the operating mode of a frequency band is not required						



10.2 Measured SAR Results

Note:

- The value with blue color is the maximum SAR Value of each test band.

Body SAR

Band	Test Position	Dist. (mm)	Mode	Duty Cycle	Ch./Freq. (MHz)	Tune-up (dBm)	Measured power (dBm)	Measured SAR1g (W/kg)	Power Drift (dB)	Scaling Factor	Report SAR1g (W/kg)	Plot No.
Wi-Fi U-NII-1	Top Edge	0	802.11a	92.0%	48/5240	15.00	14.26	0.003	0.025	1.29	0.003	/
Wi-Fi U-NII-3	Top Edge	0	802.11a	92.0%	157/5785	11.00	10.49	0.009	0.114	1.22	0.011	3

Product-specific 10g SAR

Band	Test Position	Dist. (mm)	Mode	Duty Cycle	Ch./Freq. (MHz)	Tune-up (dBm)	Measured power (dBm)	Measured SAR10g (W/kg)	Power Drift (dB)	Scaling Factor	Report SAR10g (W/kg)	Plot No.
Wi-Fi U-NII-1	Back Side	0	802.11a	92.0%	48/5240	15.00	14.26	0.119	0.009	1.29	0.153	/
	Front Side	0	802.11a	92.0%	48/5240	15.00	14.26	0.008	0.010	1.29	0.010	/
	Left Edge	0	802.11a	92.0%	48/5240	15.00	14.26	0.397	0.040	1.29	0.512	4
	Right Edge	0	802.11a	92.0%	48/5240	15.00	14.26	0.007	-0.065	1.29	0.009	/
	Top Edge	0	802.11a	92.0%	48/5240	15.00	14.26	0.001	0.025	1.29	0.001	/
	Bottom Edge	0	802.11a	92.0%	48/5240	15.00	14.26	0.009	-0.062	1.29	0.012	/
Wi-Fi U-NII-3	Back Side	0	802.11a	92.0%	157/5785	11.00	10.49	0.108	-0.190	1.22	0.132	/
	Front Side	0	802.11a	92.0%	157/5785	11.00	10.49	0.007	0.011	1.22	0.009	/
	Left Edge	0	802.11a	92.0%	157/5785	11.00	10.49	0.266	-0.060	1.22	0.325	/
	Right Edge	0	802.11a	92.0%	157/5785	11.00	10.49	0.013	0.022	1.22	0.016	/
	Top Edge	0	802.11a	92.0%	157/5785	11.00	10.49	0.006	0.114	1.22	0.007	/
	Bottom Edge	0	802.11a	92.0%	157/5785	11.00	10.49	0.004	-0.045	1.22	0.005	/



11 Measurement Uncertainty

Per KDB 865664 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. This also applies to the 10-g SAR required for phablets in KDB Publication 648474.

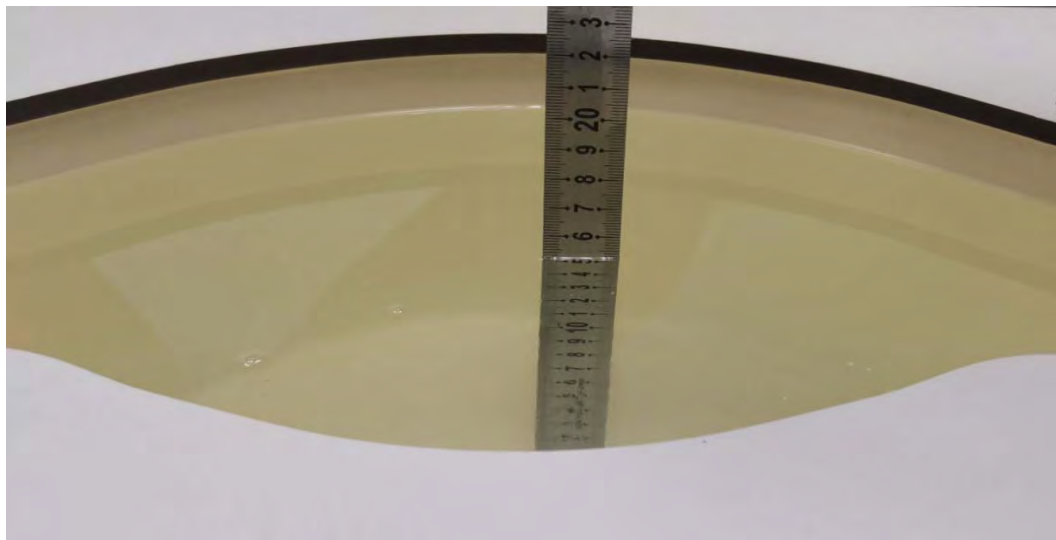
*****END OF REPORT *****

ANNEX A: Test Layout



Tissue Simulating Liquids

For the measurement of the field distribution inside the flat phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For Head and Body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Picture 3.



Picture 3: Liquid depth in the flat Phantom

ANNEX B: System Check Results

Plot 1 System Performance Check at 5250 MHz TSL

DUT: Dipole 5250 MHz; Type: D5GHzV2; Serial: 1151

Date: 2022/7/29

Communication System: CW; Frequency: 5250 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 5250 \text{ MHz}$; $\sigma = 4.80 \text{ S/m}$; $\epsilon_r = 35.5$; $\rho = 1000 \text{ kg/m}^3$

Ambient Temperature: 22.3°C Liquid Temperature: 21.5°C

Phantom section: Flat Section

DASY5 Configuration:

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Probe: EX3DV4 - SN7543; ConvF(5.44, 5.44, 5.44); Calibrated: 2021/12/28

Electronics: DAE4 SN1291; Calibrated: 2022/3/24

Phantom: SAM 1; Type: QD 000 P40 CD; Serial: 1667

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

d=10mm, Pin=100mW/Area Scan (6x10x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 9.14 mW/g

d=10mm, Pin=100mW/Zoom Scan (7x7x12)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 33.6 V/m; Power Drift = -0.095 dB

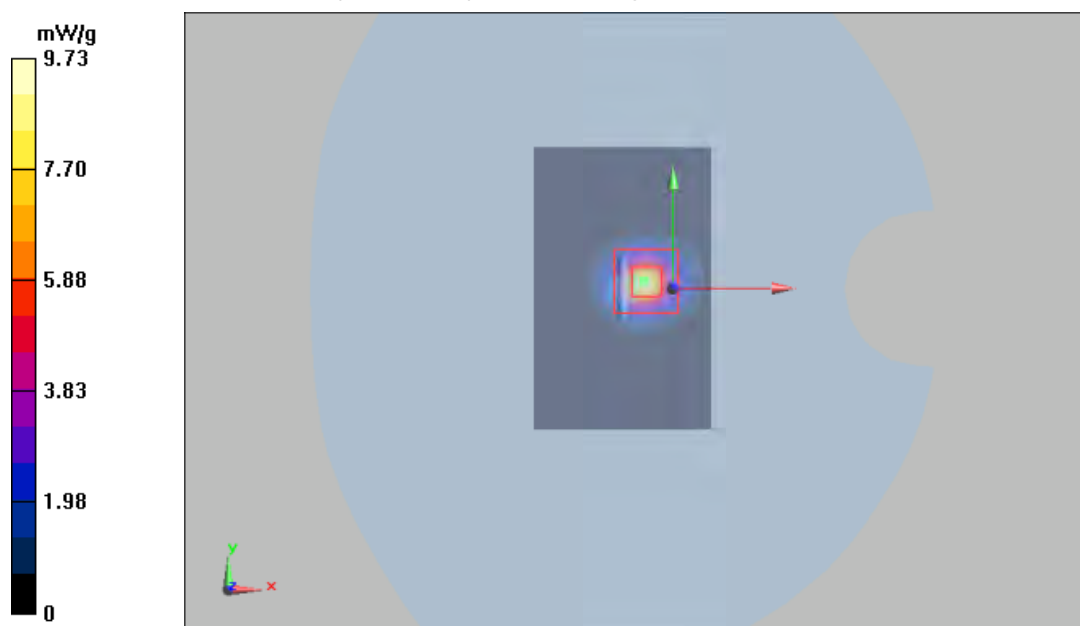
Peak SAR (extrapolated) = 52.2 W/kg

SAR(1 g) = 7.87 mW/g; SAR(10 g) = 2.25 mW/g

Smallest distance from peaks to all points 3 dB below = 12mm

Ratio of SAR at M2 to SAR at M1 = 65.4%

Maximum value of SAR (measured) = 9.73 mW/g



Plot 2 System Performance Check at 5750 MHz TSL

DUT: Dipole 5750 MHz; Type: D5GHzV2; Serial: 1151

Date: 2022/7/29

Communication System: CW; Frequency: 5750 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 5750$ MHz; $\sigma = 5.21$ S/m; $\epsilon_r = 34.9$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.3 °C Liquid Temperature: 21.5 °C

Phantom section: Flat Section

DASY5 Configuration:

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Probe: EX3DV4 - SN7543; ConvF(4.94, 4.94, 4.94); Calibrated: 2021/12/28

Electronics: DAE4 SN1291; Calibrated: 2022/3/24

Phantom: SAM 1; Type: QD 000 P40 CD; Serial: 1667

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

d=10mm, Pin=100mW/Area Scan (6x10x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 8.31 mW/g

d=10mm, Pin=100mW/Zoom Scan (7x7x12)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 23.1 V/m; Power Drift = 0.044 dB

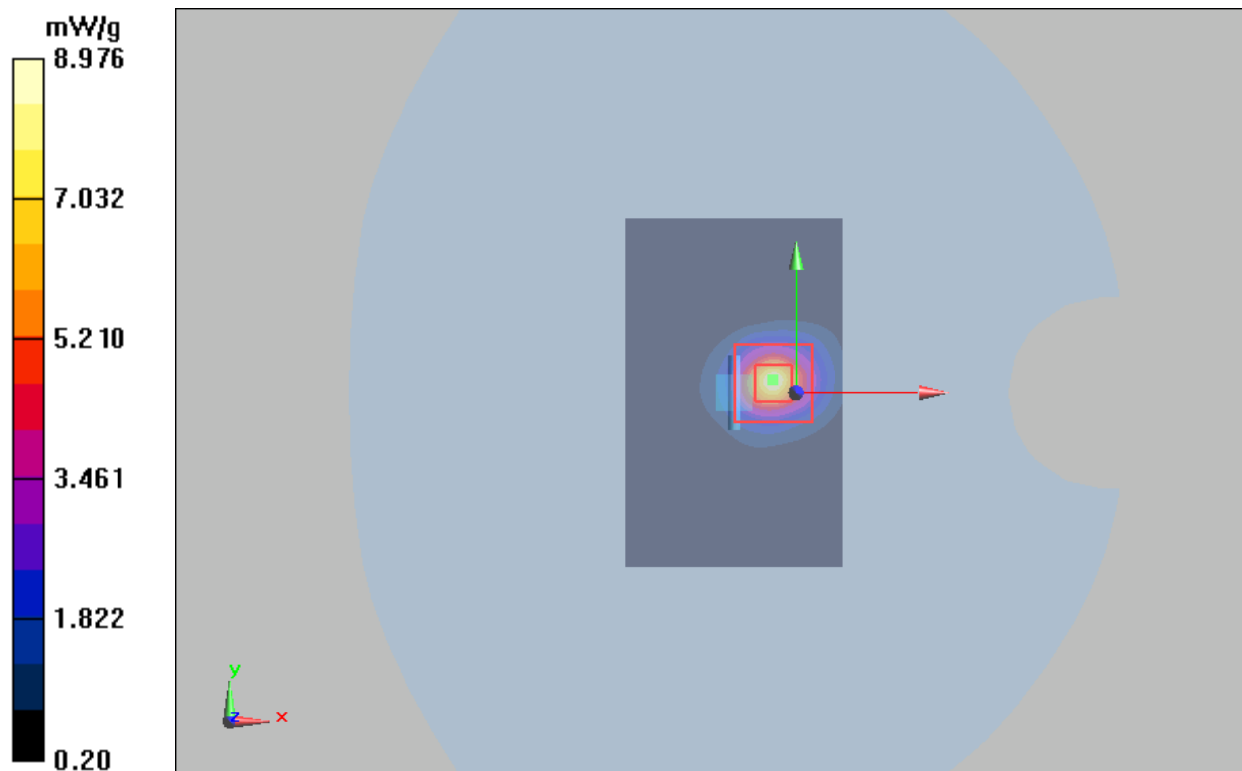
Peak SAR (extrapolated) = 23.4 W/kg

SAR(1 g) = 7.66 mW/g; SAR(10 g) = 2.27 mW/g

Smallest distance from peaks to all points 3 dB below = 8.8mm

Ratio of SAR at M2 to SAR at M1 = 31.8%

Maximum value of SAR (measured) = 8.976 mW/g



ANNEX C: Highest Graph Results

Plot 3 802.11a U-NII-3 Top Edge Middle (Distance 0mm)

Date: 2022/7/29

Communication System: UID 0, 802.11a (0); Frequency: 5785 MHz; Duty Cycle: 1:1.08

Medium parameters used: $f = 5785$ MHz; $\sigma = 5.436$ S/m; $\epsilon_r = 34.587$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.3 °C Liquid Temperature: 21.5 °C

Phantom section: Flat Section

DASY5 Configuration:

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Probe: EX3DV4 - SN7543; ConvF(4.94, 4.94, 4.94); Calibrated: 2021/12/28

Electronics: DAE4 SN1291; Calibrated: 2022/3/24

Phantom: SAM 1; Type: QD 000 P40 CD; Serial: 1667

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

Top Edge Middle /Area Scan (11x11x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 0.0103 W/kg

Top Edge Middle /Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 0.3420 V/m; Power Drift = 0.114 dB

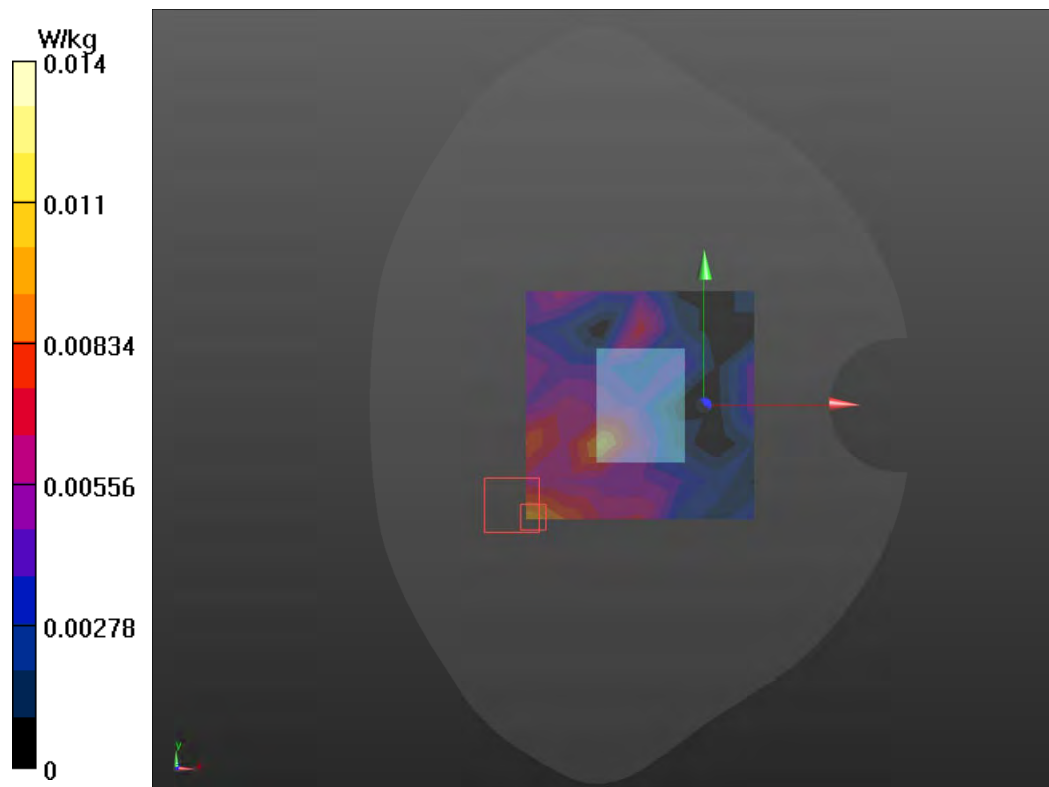
Peak SAR (extrapolated) = 0.0160 W/kg

SAR(1 g) = 0.009 W/kg; SAR(10 g) = 0.006 W/kg

Smallest distance from peaks to all points 3 dB below = 12mm

Ratio of SAR at M2 to SAR at M1 = 65.4%

Maximum value of SAR (measured) = 0.014 W/kg



Plot 4 802.11a U-NII-1 Left Edge High (Distance 0mm)

Date: 7/29/2022

Communication System: UID 0, 802.11a (0); Frequency: 5240 MHz; Duty Cycle: 1:1.08

Medium parameters used: $f = 5240$ MHz; $\sigma = 4.662$ S/m; $\epsilon_r = 36.143$; $\rho = 1000$ kg/m³

Ambient Temperature: 22.3 °C Liquid Temperature: 21.5 °C

Phantom section: Flat Section

DASY5 Configuration:

Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Probe: EX3DV4 - SN7543; ConvF(5.44, 5.44, 5.44); Calibrated: 2021/12/28

Electronics: DAE4 SN1291; Calibrated: 2022/3/24

Phantom: SAM 1; Type: QD 000 P40 CD; Serial: 1667

Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

Left Edge High/Area Scan (8x20x1): Measurement grid: dx=10mm, dy=10mm

Maximum value of SAR (measured) = 3.29 W/kg

Left Edge High/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=2mm

Reference Value = 1.400 V/m; Power Drift = 0.040 dB

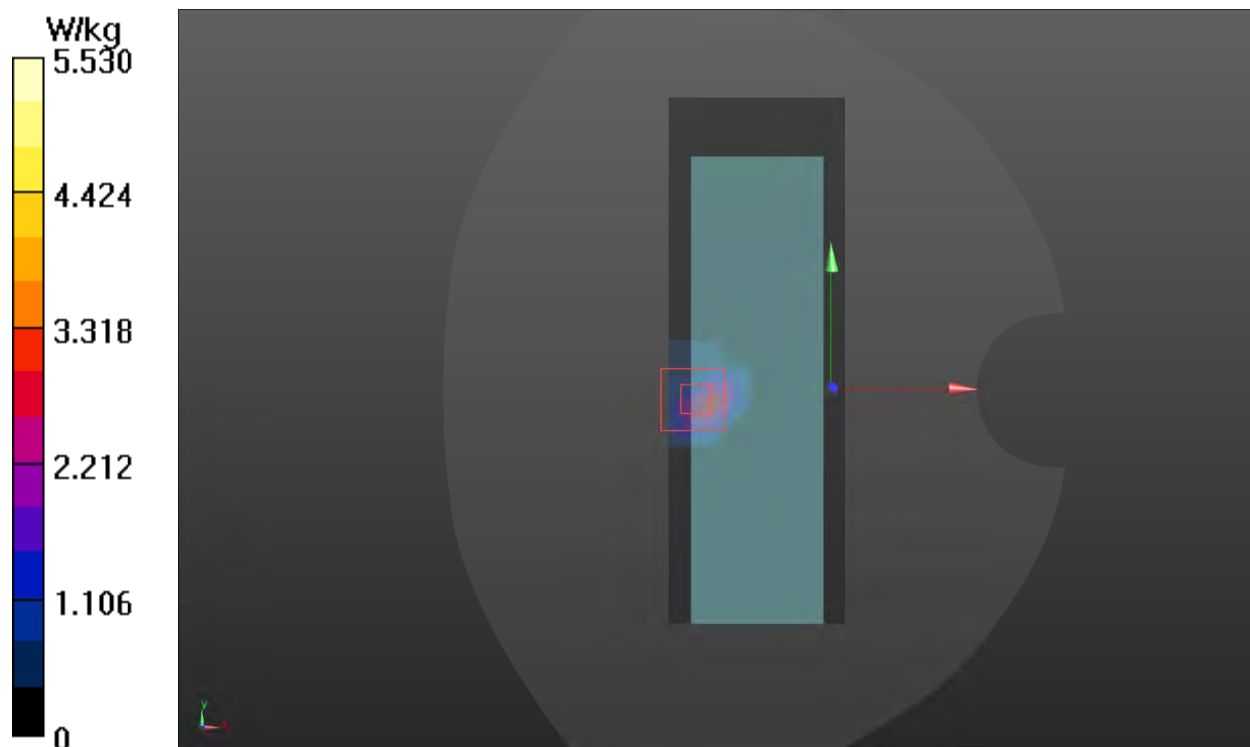
Peak SAR (extrapolated) = 10.8 W/kg

SAR(1 g) = 1.61 W/kg; SAR(10 g) = 0.397 W/kg

Smallest distance from peaks to all points 3 dB below = 8.8mm

Ratio of SAR at M2 to SAR at M1 = 31.8%

Maximum value of SAR (measured) = 5.53 W/kg





ANNEX D: Probe Calibration Certificate (SN: 7543)



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Client **TA(Shanghai)**Certificate No: **Z21-60417****CALIBRATION CERTIFICATE**Object **EX3DV4 - SN : 7543**

Calibration Procedure(s) **FF-Z11-004-02**
Calibration Procedures for Dosimetric E-field Probes

Calibration date: **December 28, 2021**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	101919	15-Jun-21(CTTL, No.J21X04466)	Jun-22
Power sensor NRP-Z91	101547	15-Jun-21(CTTL, No.J21X04466)	Jun-22
Power sensor NRP-Z91	101548	15-Jun-21(CTTL, No.J21X04466)	Jun-22
Reference 10dBAttenuator	18N50W-10dB	10-Feb-20(CTTL, No.J20X00525)	Feb-22
Reference 20dBAttenuator	18N50W-20dB	10-Feb-20(CTTL, No.J20X00526)	Feb-22
Reference Probe EX3DV4	SN 3617	27-Jan-21(SPEAG, No.EX3-3617_Jan21)	Jan-22
DAE4	SN 1555	20-Aug-21(SPEAG, No.DAE4-1555_Aug21/2)	Aug-22
Secondary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
SignalGenerator MG3700A	6201052605	16-Jun-21(CTTL, No.J21X04467)	Jun-22
Network Analyzer E5071C	MY46110673	21-Jan-21(CTTL, No.J20X00515)	Jan-22

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

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

Issued: December 30, 2021

Certificate No: Z21-60417

Page 1 of 9



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Glossary:

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

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

Calibration is Performed According to the Following Standards:

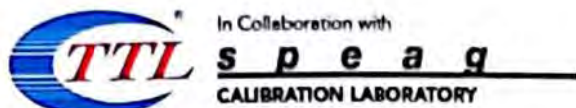
- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR)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

Methods Applied and Interpretation of Parameters:

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

Certificate No:Z21-60417

Page 2 of 9



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:7543

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm($\mu V/(V/m)^2$) ^A	0.62	0.69	0.55	±10.0%
DCP(mV) ^B	100.4	104.2	102.3	

Modulation Calibration Parameters

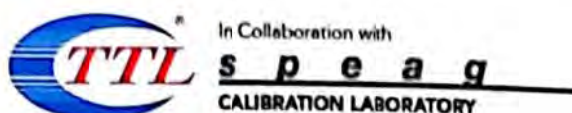
UID	Communication System Name		A dB	B dB μV	C	D dB	VR mV	Unc ^E (k=2)
0	CW	X	0.0	0.0	1.0	0.00	197.2	±2.7%
		Y	0.0	0.0	1.0		206.6	
		Z	0.0	0.0	1.0		180.8	

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

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

^B Numerical linearization parameter; uncertainty not required.

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



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:7543

Calibration Parameter Determined in Head Tissue Simulating Media

f [MHz] ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unct. (k=2)
750	41.9	0.89	10.27	10.27	10.27	0.17	1.26	±12.1%
835	41.5	0.90	9.89	9.89	9.89	0.14	1.62	±12.1%
1750	40.1	1.37	8.42	8.42	8.42	0.28	0.95	±12.1%
1900	40.0	1.40	8.20	8.20	8.20	0.28	1.03	±12.1%
2000	40.0	1.40	8.23	8.23	8.23	0.26	1.08	±12.1%
2300	39.5	1.67	7.68	7.68	7.68	0.62	0.70	±12.1%
2450	39.2	1.80	7.49	7.49	7.49	0.68	0.69	±12.1%
2600	39.0	1.96	7.24	7.24	7.24	0.50	0.81	±12.1%
3300	38.2	2.71	6.94	6.94	6.94	0.41	1.05	±13.3%
3500	37.9	2.91	6.79	6.79	6.79	0.43	1.03	±13.3%
3700	37.7	3.12	6.51	6.51	6.51	0.44	1.01	±13.3%
3900	37.5	3.32	6.40	6.40	6.40	0.35	1.35	±13.3%
4100	37.2	3.53	6.49	6.49	6.49	0.40	1.15	±13.3%
4400	36.9	3.84	6.32	6.32	6.32	0.35	1.35	±13.3%
4600	36.7	4.04	6.22	6.22	6.22	0.45	1.20	±13.3%
4800	36.4	4.25	6.16	6.16	6.16	0.45	1.20	±13.3%
4950	36.3	4.40	5.95	5.95	5.95	0.45	1.25	±13.3%
5250	35.9	4.71	5.44	5.44	5.44	0.45	1.25	±13.3%
5600	35.5	5.07	4.81	4.81	4.81	0.55	1.20	±13.3%
5750	35.4	5.22	4.94	4.94	4.94	0.55	1.25	±13.3%

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

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

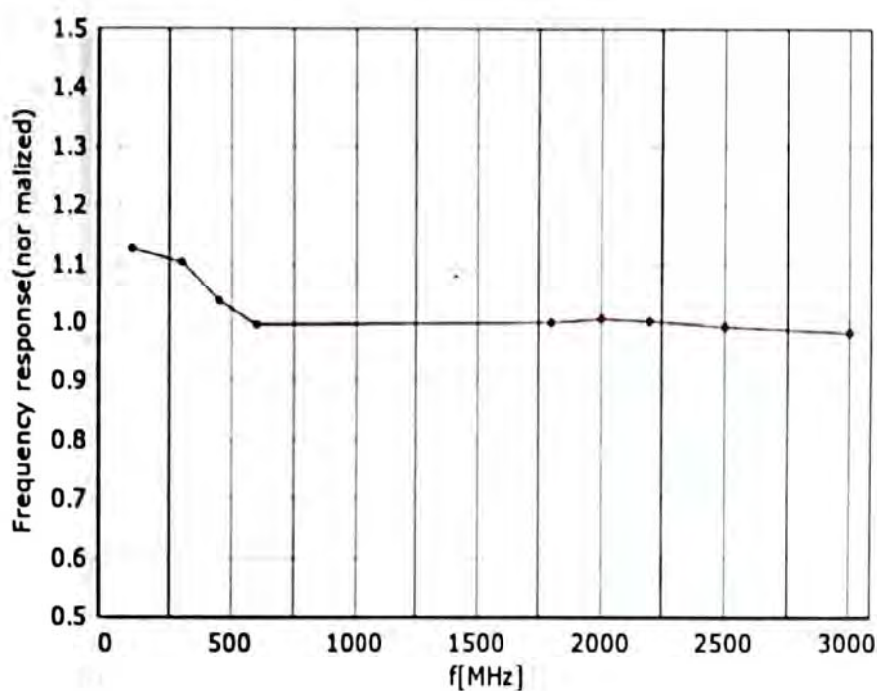
^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for the frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from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



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



* TEM

* R22

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

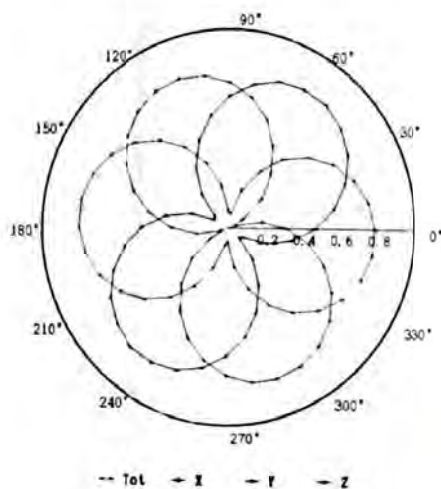


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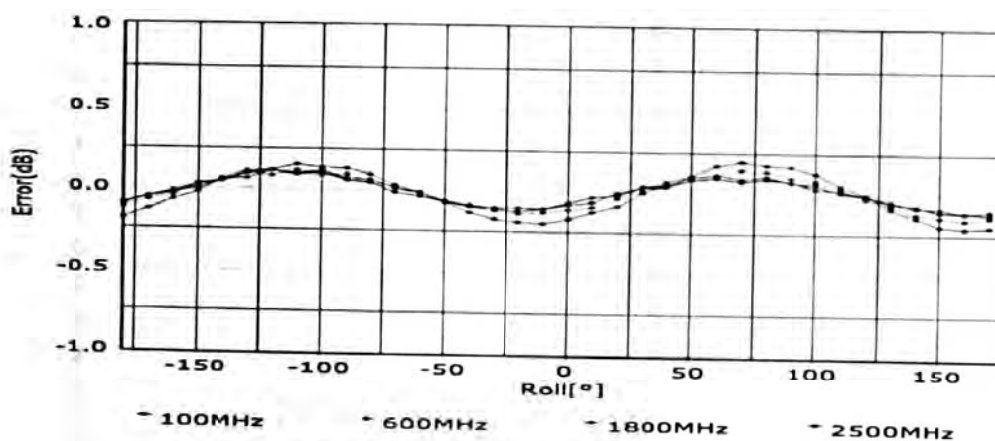
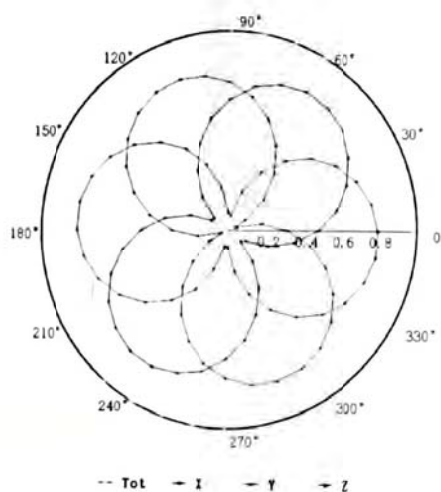
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Receiving Pattern (Φ), $\theta=0^\circ$

f=600 MHz, TEM



f=1800 MHz, R22



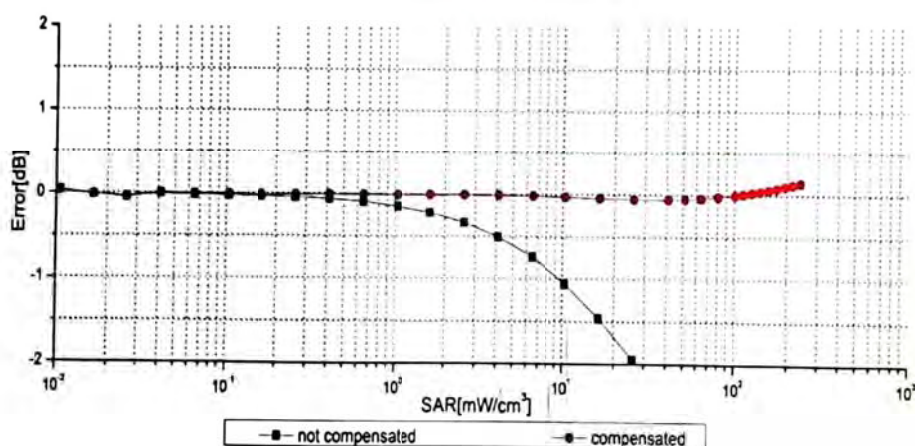
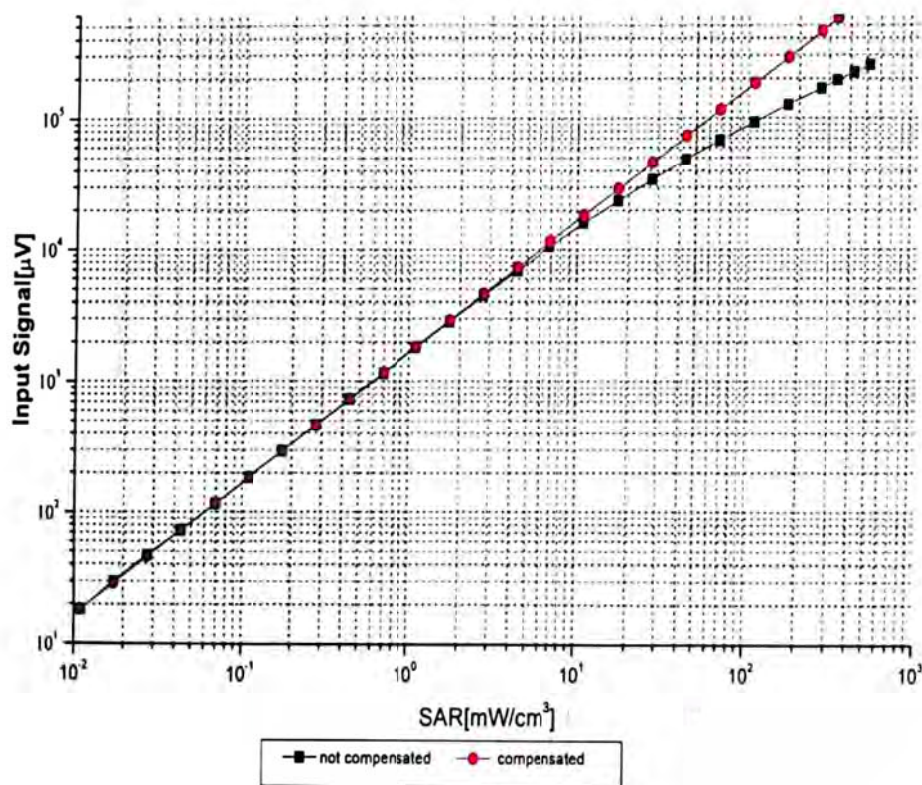
Uncertainty of Axial Isotropy Assessment: $\pm 1.2\%$ ($k=2$)



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Dynamic Range f(SAR_{head}) (TEM cell, f = 900 MHz)



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



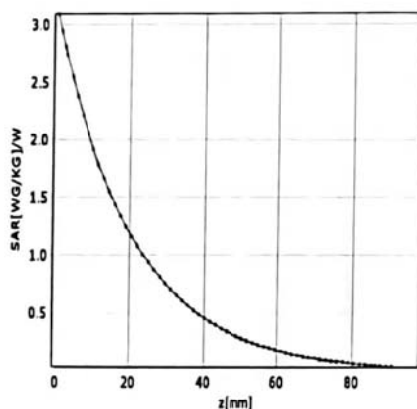
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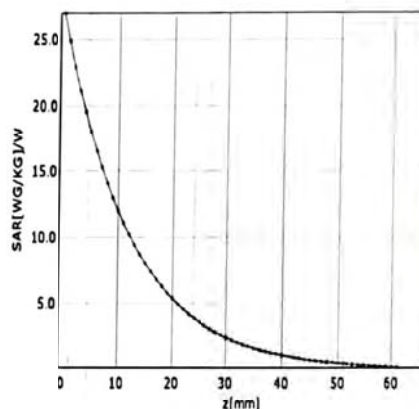
Conversion Factor Assessment

f=750 MHz,WGLS R9(H_convF)

f=1750 MHz,WGLS R22(H_convF)

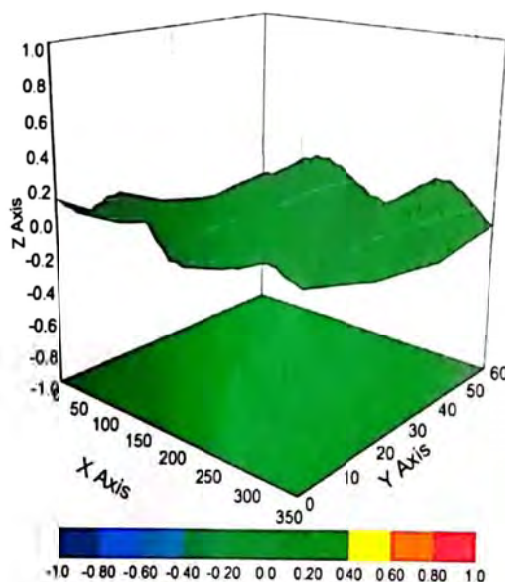


* analytical * measured



* analytical * measured

Deviation from Isotropy in Liquid



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



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DASY/EASY – Parameters of Probe: EX3DV4 – SN:7543

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	50.7
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disable
Probe Overall Length	337mm
Probe Body Diameter	10mm
Tip Length	9mm
Tip Diameter	2.5mm
Probe Tip to Sensor X Calibration Point	1mm
Probe Tip to Sensor Y Calibration Point	1mm
Probe Tip to Sensor Z Calibration Point	1mm
Recommended Measurement Distance from Surface	1.4mm



ANNEX E: D5GHzV2 Dipole Calibration Certificate



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Client TA(Shanghai)

Certificate No: Z20-60080

CALIBRATION CERTIFICATE

Object D5GHzV2 - SN: 1151

Calibration Procedure(s) FF-Z11-003-01
Calibration Procedures for dipole validation kits

Calibration date: February 27, 2020

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	106276	11-Apr-19 (CTTL, No.J19X02605)	Apr-20
Power sensor NRP6A	101369	11-Apr-19 (CTTL, No.J19X02605)	Apr-20
ReferenceProbe EX3DV4	SN 3846	25-Mar-19(CTTL-SPEAG,No.Z19-60064)	Mar-20
DAE4	SN 1555	22-Aug-19(CTTL-SPEAG,No.Z19-60295)	Aug-20
Secondary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Signal Generator E4438C	MY49071430	10-Feb-20 (CTTL, No.J20X00516)	Feb-21
NetworkAnalyzerE5071C	MY46110673	10-Feb-20 (CTTL, No.J20X00515)	Feb-21

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

Issued: February 29, 2019

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

Certificate No: Z20-60080

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Glossary:

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

Calibration is Performed According to the Following Standards:

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

Additional Documentation:

- DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

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

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



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Measurement Conditions

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

DASY Version	DASY52	V52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Triple Flat Phantom 5.1C	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy = 4 mm, dz = 1.4 mm	Graded Ratio = 1.4 (Z direction)
Frequency	5250 MHz $\pm$ 1 MHz 5600 MHz $\pm$ 1 MHz 5750 MHz $\pm$ 1 MHz	

Head TSL parameters at 5250 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	35.9	4.71 mho/m
Measured Head TSL parameters	(22.0 $\pm$ 0.2) °C	36.9 $\pm$ 6 %	4.59 mho/m $\pm$ 6 %
Head TSL temperature change during test	<1.0 °C	----	----

SAR result with Head TSL at 5250 MHz

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	100 mW input power	7.76 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	78.0 W/kg $\pm$ 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Head TSL	Condition	
SAR measured	100 mW input power	2.22 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	22.3 W/kg $\pm$ 24.2 % (k=2)



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Head TSL parameters at 5600 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	35.5	5.07 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	36.3 ± 6 %	4.96 mho/m ± 6 %
Head TSL temperature change during test	<1.0 °C	----	----

SAR result with Head TSL at 5600 MHz

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	100 mW input power	8.02 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	80.5 W/kg ± 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Head TSL	Condition	
SAR measured	100 mW input power	2.29 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	23.0 W/kg ± 24.2 % (k=2)

Head TSL parameters at 5750 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	35.4	5.22 mho/m
Measured Head TSL parameters	(22.0 ± 0.2) °C	36.1 ± 6 %	5.12 mho/m ± 6 %
Head TSL temperature change during test	<1.0 °C	----	----

SAR result with Head TSL at 5750 MHz

SAR averaged over 1 cm ³ (1 g) of Head TSL	Condition	
SAR measured	100 mW input power	7.72 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	77.4 W/kg ± 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Head TSL	Condition	
SAR measured	100 mW input power	2.18 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	21.9 W/kg ± 24.2 % (k=2)



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Body TSL parameters at 5250 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	48.9	5.36 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	48.1 ± 6 %	5.27 mho/m ± 6 %
Body TSL temperature change during test	<1.0 °C	----	----

SAR result with Body TSL at 5250 MHz

SAR averaged over 1 cm ³ (1 g) of Body TSL	Condition	
SAR measured	100 mW input power	7.37 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	73.4 W/kg ± 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Body TSL	Condition	
SAR measured	100 mW input power	2.09 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	20.8 W/kg ± 24.2 % (k=2)

Body TSL parameters at 5600 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	48.5	5.77 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	47.4 ± 6 %	5.74 mho/m ± 6 %
Body TSL temperature change during test	<1.0 °C	----	----

SAR result with Body TSL at 5600 MHz

SAR averaged over 1 cm ³ (1 g) of Body TSL	Condition	
SAR measured	100 mW input power	7.78 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	77.4 W/kg ± 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Body TSL	Condition	
SAR measured	100 mW input power	2.21 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	22.0 W/kg ± 24.2 % (k=2)



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Body TSL parameters at 5750 MHz

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Body TSL parameters	22.0 °C	48.3	5.94 mho/m
Measured Body TSL parameters	(22.0 ± 0.2) °C	47.1 ± 6 %	5.96 mho/m ± 6 %
Body TSL temperature change during test	<1.0 °C	---	---

SAR result with Body TSL at 5750 MHz

SAR averaged over 1 cm ³ (1 g) of Body TSL	Condition	
SAR measured	100 mW input power	7.38 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	73.5 W/kg ± 24.4 % (k=2)
SAR averaged over 10 cm ³ (10 g) of Body TSL	Condition	
SAR measured	100 mW input power	2.07 W/kg
SAR for nominal Body TSL parameters	normalized to 1W	20.6 W/kg ± 24.2 % (k=2)



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Appendix (Additional assessments outside the scope of CNAS L0570)

Antenna Parameters with Head TSL at 5250 MHz

Impedance, transformed to feed point	52.4Ω - 6.47jΩ
Return Loss	- 23.4dB

Antenna Parameters with Head TSL at 5600 MHz

Impedance, transformed to feed point	57.0Ω - 3.86jΩ
Return Loss	- 22.6dB

Antenna Parameters with Head TSL at 5750 MHz

Impedance, transformed to feed point	55.9Ω + 0.16jΩ
Return Loss	- 25.0dB

Antenna Parameters with Body TSL at 5250 MHz

Impedance, transformed to feed point	51.6Ω - 5.33jΩ
Return Loss	- 25.3dB

Antenna Parameters with Body TSL at 5600 MHz

Impedance, transformed to feed point	57.6Ω - 2.15jΩ
Return Loss	- 22.7dB

Antenna Parameters with Body TSL at 5750 MHz

Impedance, transformed to feed point	55.4Ω + 1.94jΩ
Return Loss	- 25.2dB



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General Antenna Parameters and Design

Electrical Delay (one direction)	1.066 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

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DASY5 Validation Report for Head TSL

Date: 02.24.2020

Test Laboratory: CTTL, Beijing, China

DUT: Dipole 5GHz; Type: D5GHzV2; Serial: D5GHzV2 - SN: 1151

Communication System: CW; Frequency: 5250 MHz, Frequency: 5600 MHz,
Frequency: 5750 MHz,

Medium parameters used: $f = 5250$ MHz; $\sigma = 4.592$ S/m; $\epsilon_r = 36.91$; $\rho = 1000$ kg/m³, Medium parameters used: $f = 5600$ MHz; $\sigma = 4.963$ S/m; $\epsilon_r = 36.29$; $\rho = 1000$ kg/m³, Medium parameters used: $f = 5750$ MHz; $\sigma = 5.123$ S/m; $\epsilon_r = 36.06$; $\rho = 1000$ kg/m³,

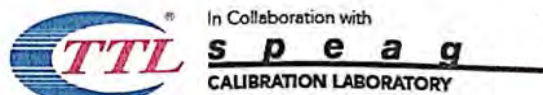
Phantom section: Center Section

DASY5 Configuration:

- Probe: EX3DV4 - SN3846; ConvF(5.4, 5.4, 5.4) @ 5250 MHz; ConvF(4.64, 4.64, 4.64) @ 5300 MHz; ConvF(4.92, 4.92, 4.92) @ 5750 MHz; Calibrated: 2019-03-25
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1555; Calibrated: 2019-08-22
- Phantom: MFP_V5.1C (20deg probe tilt); Type: QD 000 P51 Cx; Serial: 1062
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

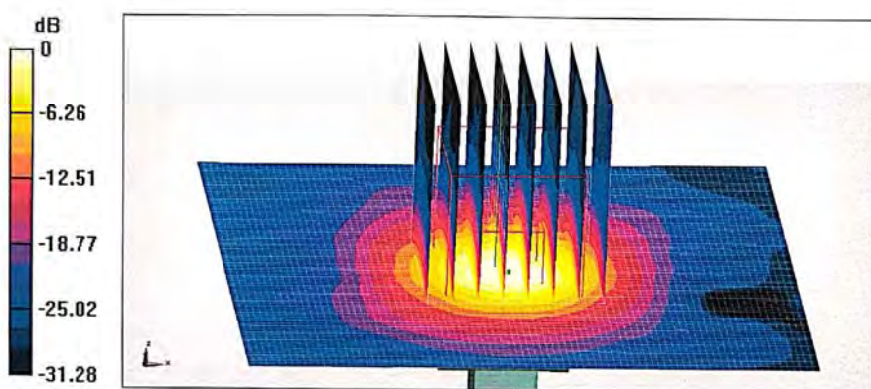
Dipole Calibration /Pin=100mW, d=10mm, f=5250 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 70.08 V/m; Power Drift = -0.07 dB
Peak SAR (extrapolated) = 33.7 W/kg
SAR(1 g) = 7.76 W/kg; SAR(10 g) = 2.22 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 63%
Maximum value of SAR (measured) = 18.7 W/kg

Dipole Calibration /Pin=100mW, d=10mm, f=5600 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 70.02 V/m; Power Drift = -0.07 dB
Peak SAR (extrapolated) = 36.2 W/kg
SAR(1 g) = 8.02 W/kg; SAR(10 g) = 2.29 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 61.4%
Maximum value of SAR (measured) = 19.7 W/kg



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Dipole Calibration /Pin=100mW, d=10mm, f=5750 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 68.01 V/m; Power Drift = -0.08 dB
Peak SAR (extrapolated) = 37.0 W/kg
SAR(1 g) = 7.72 W/kg; SAR(10 g) = 2.18 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 59.9%
Maximum value of SAR (measured) = 19.2 W/kg



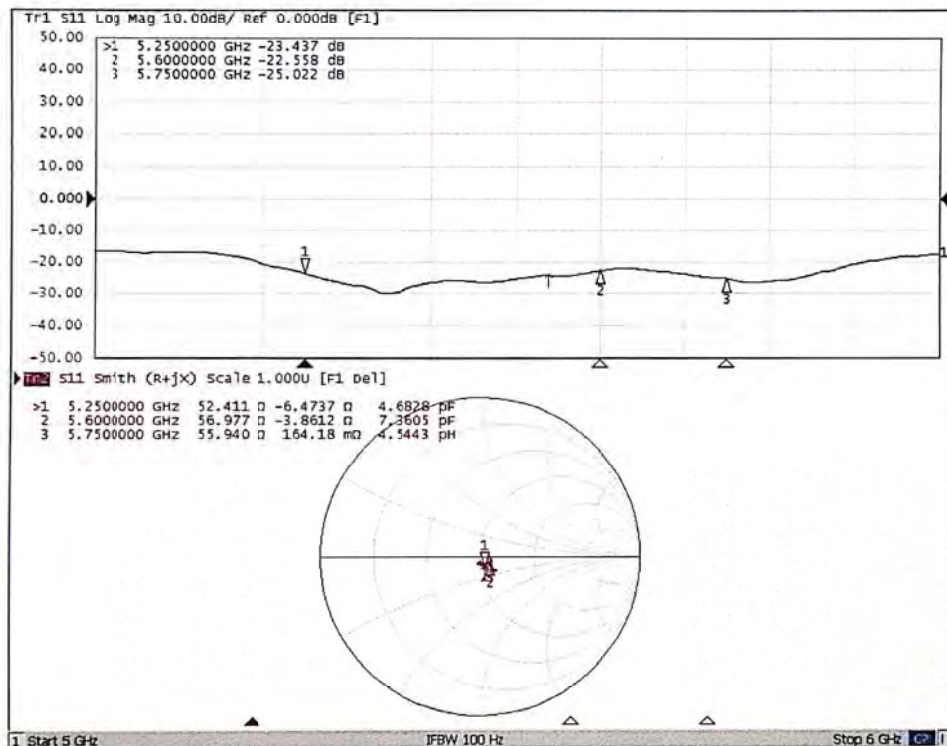
0 dB = 19.2 W/kg = 12.83 dBW/kg



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Impedance Measurement Plot for Head TSL





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DASY5 Validation Report for Body TSL

Date: 02.27.2020

Test Laboratory: CTTL, Beijing, China

DUT: Dipole 5GHz; Type: D5GHzV2; Serial: D5GHzV2 - SN: 1151

Communication System: CW; Frequency: 5250 MHz, Frequency: 5600 MHz,
Frequency: 5750 MHz,

Medium parameters used: $f = 5250$ MHz; $\sigma = 5.267$ S/m; $\epsilon_r = 48.1$; $\rho = 1000$ kg/m³,
Medium parameters used: $f = 5600$ MHz; $\sigma = 5.736$ S/m; $\epsilon_r = 47.44$; $\rho = 1000$
kg/m³, Medium parameters used: $f = 5750$ MHz; $\sigma = 5.963$ S/m; $\epsilon_r = 47.11$; $\rho =$
1000 kg/m³,

Phantom section: Right Section

DASY5 Configuration:

- Probe: EX3DV4 - SN3846; ConvF(5.01, 5.01, 5.01) @ 5250 MHz; ConvF(4.29, 4.29, 4.29) @ 5600 MHz; ConvF(4.32, 4.32, 4.32) @ 5750 MHz; Calibrated: 2019-03-25,
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1555; Calibrated: 2019-08-22
- Phantom: MFP_V5.1C (20deg probe tilt); Type: QD 000 P51 Cx; Serial: 1062
- Measurement SW: DASY52, Version 52.10 (4); SEMCAD X Version 14.6.14 (7483)

Dipole Calibration /Pin=100mW, d=10mm, f=5250 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 62.50 V/m; Power Drift = 0.03 dB
Peak SAR (extrapolated) = 30.1 W/kg
SAR(1 g) = 7.37 W/kg; SAR(10 g) = 2.09 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 64.9%
Maximum value of SAR (measured) = 17.2 W/kg

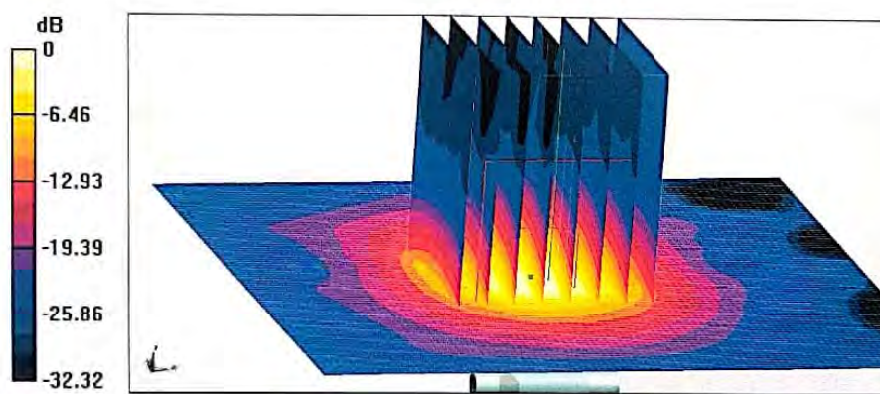
Dipole Calibration /Pin=100mW, d=10mm, f=5600 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 63.00 V/m; Power Drift = 0.07 dB
Peak SAR (extrapolated) = 33.3 W/kg
SAR(1 g) = 7.78 W/kg; SAR(10 g) = 2.21 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 63.4%
Maximum value of SAR (measured) = 18.6 W/kg



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Dipole Calibration /Pin=100mW, d=10mm, f=5750 MHz/Zoom Scan,
dist=1.4mm (8x8x7)/Cube 0: Measurement grid: dx=4mm, dy=4mm, dz=1.4mm
Reference Value = 62.00 V/m; Power Drift = -0.02 dB
Peak SAR (extrapolated) = 33.5 W/kg
SAR(1 g) = 7.38 W/kg; SAR(10 g) = 2.07 W/kg
Smallest distance from peaks to all points 3 dB below = 7.2 mm
Ratio of SAR at M2 to SAR at M1 = 61.1%
Maximum value of SAR (measured) = 17.8 W/kg



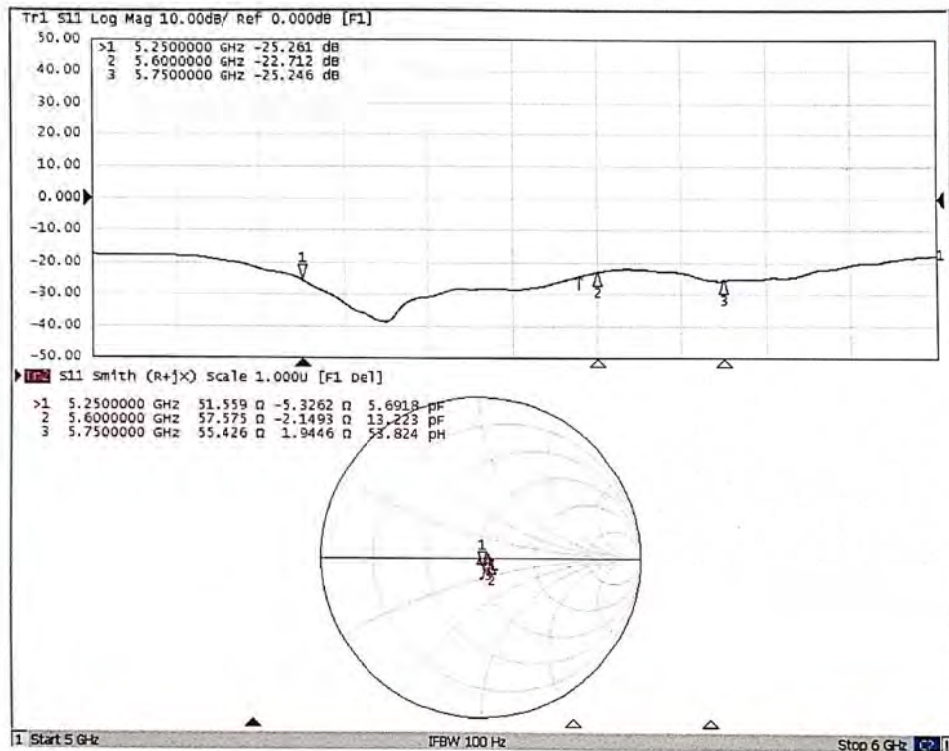
0 dB = 17.8 W/kg = 12.50 dBW/kg



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Impedance Measurement Plot for Body TSL



**ANNEX F: DAE4 Calibration Certificate (SN: 1291)**

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中国认可
国际互认
校准
CALIBRATION
CNAS L0570

Client : **TA(Shanghai)**Certificate No: **Z22-60098****CALIBRATION CERTIFICATE**

Object

DAE4 - SN: 1291

Calibration Procedure(s)

FF-Z11-002-01

Calibration Procedure for the Data Acquisition Electronics (DAEx)

Calibration date:

March 24, 2022

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Process Calibrator 753	1971018	15-Jun-21 (CTTL, No.J21X04465)	Jun-22

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

Issued: March 28, 2022

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

Certificate No: Z22-60098

Page 1 of 3



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Glossary:

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

Methods Applied and Interpretation of Parameters:

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



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DC Voltage Measurement

A/D - Converter Resolution nominal

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

Low Range: 1LSB = 61nV, full range = -1.....+3mV

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

Calibration Factors	X	Y	Z
High Range	402.577 $\pm$ 0.15% (k=2)	403.249 $\pm$ 0.15% (k=2)	403.164 $\pm$ 0.15% (k=2)
Low Range	3.97371 $\pm$ 0.7% (k=2)	3.97778 $\pm$ 0.7% (k=2)	3.97281 $\pm$ 0.7% (k=2)

Connector Angle

Connector Angle to be used in DASY system	167° $\pm$ 1 °
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ANNEX G: The EUT Appearance

The EUT Appearance are submitted separately.



ANNEX H: Test Setup Photos

The Test Setup Photos are submitted separately.