

RF Exposure report



The following samples were submitted and identified on behalf of the client as:

Product Name PRO X
Brand Name MiTAC, Bridgestone Mobility Solutions
Model No. N727
Applicant Mitac Digital Technology Corporation
4F., No. 1, R&D Road 2, Hsinchu Science Park, Hsinchu
30076 Taiwan
Standards IEEE/ANSI C95.1-1992, IEEE 1528-2013
FCC ID P4Q-PROX
Date of EUT Receipt Jul. 02, 2024
Date of Test(s) Jul. 03, 2024 ~ Jul. 09, 2024
Date of Issue Aug. 29, 2024

In the configuration tested, the EUT complied with the standards specified above.

Remarks:

This report details the results of the testing carried out on one sample, the results contained in this test report do not relate to other samples of the same product. The manufacturer should ensure that all products in series production are in conformity with the product sample detailed in this report.

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Signed on behalf of SGS

Clerk / Cindy Chou	PM / Bond Tsai	Approved By / John Yeh
Cindy Chou	Bond Tsai	John Yeh

Date: Aug. 29, 2024

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Revision History

Report Number	Revision	Description	Issue Date	Revised By	Remark
TESA2407000436E5	00	Initial creation of document	Aug. 29, 2024	Cindy Chou	

Note:

1. The mark " * " is the revised version of the report due to comments submitted by the certification.

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Contents

1	GENERAL INFORMATION	4
1.1	Test Methodology	4
1.2	Description of EUT.....	5
1.3	Maximum value	5
2	MEASUREMENT SYSTEM	6
2.1	Test Facility	6
2.2	SAR System	7
3	SAR SYSTEM VERIFICATION.....	10
3.1	Tissue Simulating Liquid.....	10
3.2	Tissue Simulant Liquid measurement	10
3.3	Measurement results of Tissue Simulant Liquid.....	10
3.4	The composition of the tissue simulating liquid:.....	11
3.5	System check	11
3.6	System check results	12
4	TEST CONFIGURATIONS	13
4.1	Test Environment.....	13
4.2	Test Note.....	13
4.3	Test position.....	14
4.4	Test limit	15
5	SUMMARY OF RESULTS	18
5.1	Decision rules	18
5.2	Summary of SAR Results.....	18
5.3	Reporting statements of conformity	18
5.4	Conclusion	18
6	INSTRUMENTS LIST	19
7	UNCERTAINTY BUDGET	20
8	SAR MEASUREMENT RESULTS.....	21
9	SAR SYSTEM CHECK RESULTS	22
10	APPENDIXES	23
10.1	SAR_Appendix A Photographs.....	23
10.2	SAR_Appendix B DAE & Probe Cal. Certificate	23
10.3	SAR_Appendix C Phantom Description & Dipole Cal. Certificate	23

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1 GENERAL INFORMATION

1.1 Test Methodology

The SAR testing method and procedure for this device is in accordance with the following standards:

IEEE/ANSI C95.1-1992

IEEE 1528-2013

KDB447498D01v06

KDB865664D01v01r04

KDB865664D02v01r02

KDB616217D04v01r02

IEC/IEEE 62209-1528:2020

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1.2 Description of EUT

Product Name	PRO X
Brand Name	MiTAC, Bridgestone Mobility Solutions
Model No.	N727
FCC ID	P4Q-PROX

1.3 Maximum value

Summary of Maximum SAR Value	
Mode	Highest SAR 1g (W/kg)
NFC	0.008

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2 MEASUREMENT SYSTEM

2.1 Test Facility

Laboratory	Test Site Address	Test Site Name	FCC Designation number	IC CAB identifier
SGS Taiwan Ltd. Central RF Lab. (TAF code 3702)	1F, No. 8, Alley 15, Lane 120, Sec. 1, NeiHu Road, NeiHu District, Taipei City, 11493, Taiwan.	SAR 2	TW0029	TW3702
		SAR 6		
		SAR 8		
	No. 2, Keji 1st Rd., Guishan Township, Taoyuan County, 33383, Taiwan	SAR 1	TW0028	
		SAR 4		
	No.134, Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan	SAR 3	TW0027	
		SAR 7		

Note: Test site name is remarked on the equipment list in each section of this report as an indication where measurements occurred in specific test site and address.

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Block Diagram (DASY6)

[illegible]

- 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 Windows 10 and the DASY6 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.

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EX3DV4 E-Field Probe

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Calibration	Basic Broad Band Calibration in air Conversion Factors (CF) for HSL 13 MHz Additional CF for other liquids and frequencies upon request	
Frequency	10 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 μW/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μW/g)	
Dimensions	Tip diameter: 2.5 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%.	

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PHANTOM (ELI)

Model	ELI	
Construction	The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
Shell Thickness	2 ± 0.2 mm	
Filling Volume	Approx. 30 liters	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	

DEVICE HOLDER

Construction	The device holder (Supporter) for Notebook is made by POM (polyoxymethylene resin) , which is non-metal and non-conductive. The height can be adjusted to fit varies kind of notebooks.	
		Device Holder

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3 SAR SYSTEM VERIFICATION

3.1 Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with homogeneous tissue simulating liquid. For head SAR testing, the liquid height from the ear rint (ERP) of the phantom to the liquid top surface is larger than 15cm. For body SAR testing, the liquid height from reference point of the center of the flat phantom to the liquid top surface is larger than 15cm.

3.2 Tissue Simulant Liquid measurement

The dielectric properties for this Head-simulant fluid were measured by using the SPEAG Dielectric Assessment Kit (DAKS-12)

All dielectric parameters of tissue simulates were measured within 24 hours of SAR measurements. The measured conductivity and permittivity are all within $\pm 5\%$ of the target values.

3.3 Measurement results of Tissue Simulant Liquid

Measured Frequency (MHz)	Target Dielectric Constant, ϵ_r	Target Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ_r	Measured Conductivity, σ (S/m)	% dev ϵ_r	% dev σ	Limit	Measurement Date
13	55.000	0.750	55.208	0.728	0.38%	-2.93%	$\pm 5\%$	Jul. 09, 2024
13.56	55.000	0.750	55.096	0.737	0.17%	-1.73%	$\pm 5\%$	Jul. 09, 2024

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3.4 The composition of the tissue simulating liquid:

Simulating Liquids for 600 MHz -10 GHz, Manufactured by SPEAG:

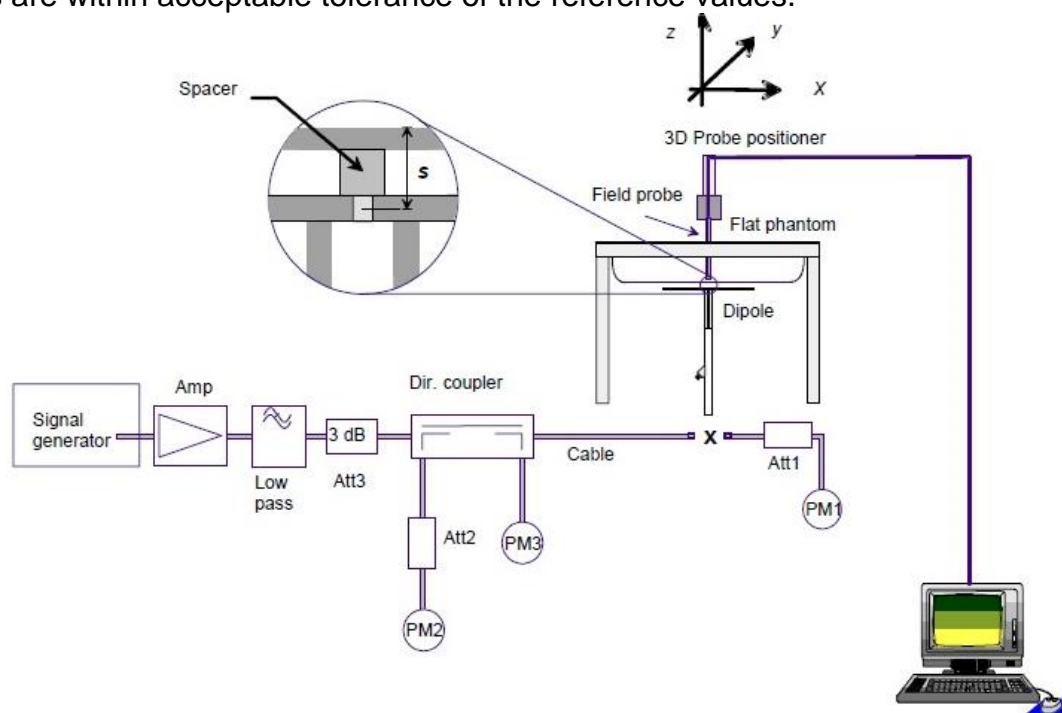
Broad-band head tissue simulating liquids	SPEAG Product	Frequency range (MHz)	Main Ingredients
	HBBL600-10000V6	600 - 10000	Water, Oil

3.5 System check

The microwave circuit arrangement for system check is sketched in below. The daily system accuracy verification occurs within the flat section of the SAM phantom and ELI phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values.

The tests were conducted on the same days as the measurement of the DUT. The obtained results from the system accuracy verification are displayed with SAR values normalized to 1W forward power delivered to the dipole.

During the tests, the liquid depth from the center of the flat phantom to the liquid top surface was 15 cm above in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



The block diagram of system check

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3.6 System check results

Validation Kit	S/N	Frequency (MHz)	1W Target 1g-SAR (W/kg)	pin=250mW Measured 1g-SAR (W/kg)	Normalized to 1W 1g-SAR (W/kg)	Deviation (%)	Limit	Measurement Date
CLA13	1027	13	0.52	0.124	0.496	-4.62	± 10%	Jul.09,2024

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4 TEST CONFIGURATIONS

4.1 Test Environment

Ambient Temperature: $22 \pm 2^{\circ}\text{C}$

Tissue Simulating Liquid: $22 \pm 2^{\circ}\text{C}$

4.2 Test Note

1. Measurements are performed respectively on the lowest, middle and highest channels of the operating band(s).
2. The EUT is set to maximum power level during all tests, and at the beginning of each test the battery is fully charged.
3. During the SAR testing, the DASY system checks power drift by comparing the e-field strength of one specific location measured at the beginning with that measured at the end of the SAR testing.
4. According to KDB447498D01v06, testing of other required channels is not required when the reported 1-g SAR for the highest output channel is $\leq 0.8\text{ W/kg}$, when the transmission band is $\leq 100\text{MHz}$.
5. According to KDB865664D01v01r04, SAR measurement variability must be assessed for each frequency band. When the original highest measured SAR is $\geq 0.8\text{ W/kg}$, repeated that measurement once. Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is $\geq 1.45\text{ W/kg}$ ($\sim 10\%$ from the 1-g SAR limit).

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4.3 Test position

Tablet mode SAR test position (0mm)

For full-size tablet, according to KDB 616217 D04, SAR evaluation is required for back surface and edges of the devices. The back surface and edges of the tablet are tested with the tablet touching the phantom. Exposures from antennas through the front surface of the display section of a tablet are generally limited to the user's hands. Exposures to hands for typical consumer transmitters used in tablets are not expected to exceed the extremity SAR limit; therefore, SAR evaluation for the front surface of tablet display screens are generally not necessary. When voice mode is supported on a tablet and it is limited to speaker mode or headset operations only, additional SAR testing for this type of voice use is not required.

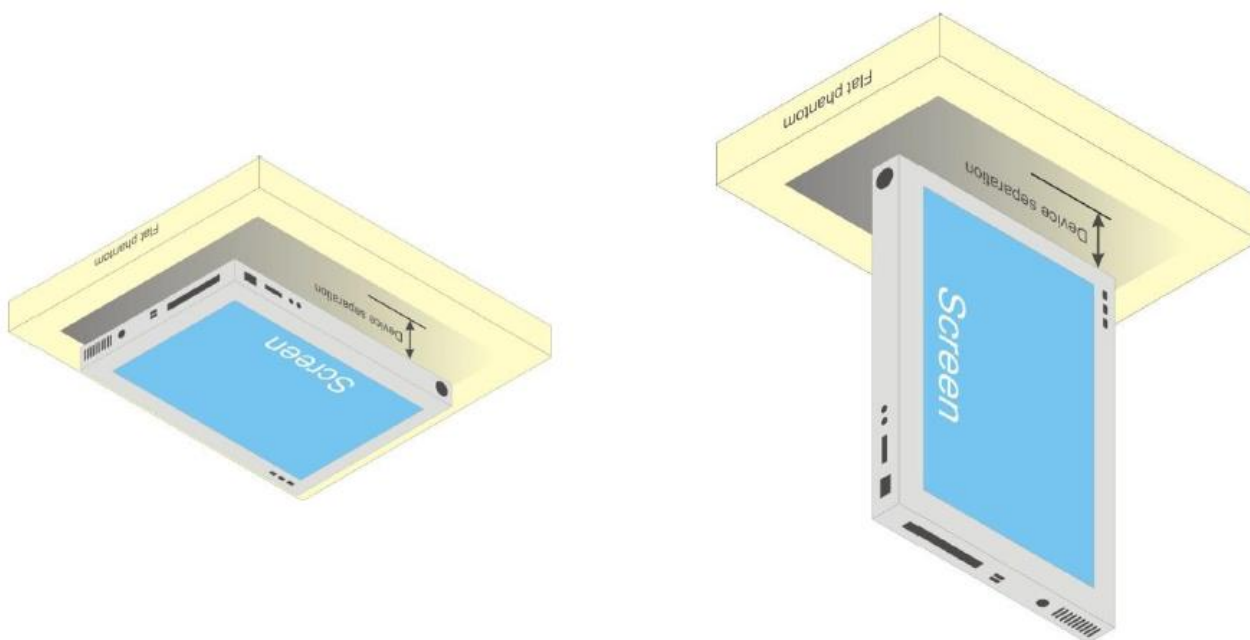


Illustration for Tablet Setup

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4.4 Test limit

§ 2.1093(d)(1)

Applications for equipment authorization of portable RF sources subject to routine environmental evaluation must contain a statement confirming compliance with the limits specified in § 1.1310 as part of their application. Technical information showing the basis for this statement must be submitted to the Commission upon request. The SAR limits specified in § 1.1310(a) through (c) of this chapter shall be used for evaluation of portable devices transmitting in the frequency range from 100 kHz to 6 GHz. Portable devices that transmit at frequencies above 6 GHz shall be evaluated in terms of the MPE limits specified in Table 1 to § 1.1310(e)(1). A minimum separation distance applicable to the operating configurations and exposure conditions of the device shall be used for the evaluation. In general, maximum time-averaged power levels must be used for evaluation. All unlicensed personal communications service (PCS) devices and unlicensed NII devices shall be subject to the limits for general population/uncontrolled exposure.

Radiofrequency radiation exposure limits.

§ 1.1310(a)

Specific absorption rate (SAR) shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in § 1.1307(b) within the frequency range of 100 kHz to 6 GHz (inclusive).

§ 1.1310(b)

The SAR limits for occupational/controlled exposure are 0.4 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 8 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit for occupational/controlled exposure is 20 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 6 minutes to determine compliance with occupational/controlled SAR limits.

§ 1.1310(c)

The SAR limits for general population/uncontrolled exposure are 0.08 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 1.6 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit is 4 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 30 minutes to determine compliance with general population/uncontrolled SAR limits.

Note to paragraphs (a) through (c):

SAR is a measure of the rate of energy absorption due to exposure to RF electromagnetic energy. These SAR limits to be used for evaluation are based generally on criteria published by the American National Standards Institute (ANSI) for localized SAR in Section 4.2 of "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE Std C95.1-1992, copyright 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017. 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 Radiofrequency Electromagnetic Fields," NCRP Report No. 86, Section 17.4.5, copyright 1986 by NCRP, Bethesda, Maryland 20814. Limits for whole body SAR and peak spatial-average SAR are based

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on recommendations made in both of these documents. The MPE limits in Table 1 are based generally on criteria published by the NCRP in "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," NCRP Report No. 86, Sections 17.4.1, 17.4.1.1, 17.4.2 and 17.4.3, copyright 1986 by NCRP, Bethesda, Maryland 20814. In the frequency range from 100 MHz to 1500 MHz, these MPE exposure limits for field strength and power density are also generally based on criteria recommended by the ANSI in [Section 4.1](#) of "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE Std C95.1-1992, copyright 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.

Portable devices that transmit at frequencies above 6 GHz shall be evaluated in terms of the MPE limits specified in Table 1 to [§ 1.1310\(e\)\(1\)](#).

According to ANSI/IEEE C95.1-1992, the criteria listed in the following Table shall be used to evaluate the environmental impact of human exposure to radio frequency (RF) radiation as specified in §1.1310.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes

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Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(i) Limits for Occupational/Controlled Exposure				
0.3-3.0	614	1.63	*(100)	≤6
3.0-30	1842/f	4.89/f	*(900/f ²)	<6
30-300	61.4	0.163	1.0	<6
300-1,500			f/300	<6
1,500-100,000			5	<6
(ii) Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	<30
1.34-30	824/f	2.19/f	*(180/f ²)	<30
30-300	27.5	0.073	0.2	<30
300-1,500			f/1500	<30
1,500-100,000			1.0	<30

f = frequency in MHz. * = Plane-wave equivalent power density.

Table 1 to § 1.1310(e)(1) - Limits for Maximum Permissible Exposure (MPE)

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5 SUMMARY OF RESULTS

5.1 Decision rules

Reported measurement data comply with Test Methodology in section 1.1.

Determining compliance shall be based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.

5.2 Summary of SAR Results

Band	Position	Distance (mm)	Freq. (MHz)	Averaged SAR over 1g (W/kg)	ID
				Measured	
NFC	Front Surface	0	13.56	0.008	001
NFC	Back Surface	0	13.56	0.001	-
NFC	Top Edge	0	13.56	0.001	-
NFC	Bottom Edge	0	13.56	0.001	-
NFC	Left Edge	0	13.56	0.002	-
NFC	Right Edge	0	13.56	0.001	-

Note:

Reported SAR = measured SAR * Power scaling * Duty cycle scaling

5.3 Reporting statements of conformity

The conformity statement in this report is based solely on the test results, measurement uncertainty is excluded.

5.4 Conclusion

The device is compliant because all the standalone results are less than their corresponding criteria.

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6 INSTRUMENTS LIST

Equipment List					
Manufacturer	Device	Type	Serial number	Date of last calibration	Date of next calibration
SPEAG	Data acquisition Electronics	DAE4	547	Jan/18/2024	Jan/17/2025
SPEAG	Dosimetric E-Field Probe	EX3DV4	7466	Jan/22/2024	Jan/21/2025
SPEAG	Verification Source 13MHz	CLA13	1027	Sep/21/2023	Sep/20/2024
SPEAG	Dielectric Assessment Kit	DAKS-12	1039	Sep/21/2023	Sep/20/2024
Keysight	EXA Signal Analyzer	N9010B	MY59071571	Jun/04/2024	Jun/03/2025
Agilent	Dual-directional coupler	772D	MY52180142	Oct/23/2023	Oct/22/2024
EMCI	Amplifier	ZHL-42	980189	Calibration not required	Calibration not required
R&S	Power Sensor	NRP18S	101973	Feb/27/2024	Feb/26/2025
R&S	Power Meter	NRX	102191	Feb/27/2024	Feb/26/2025
SPEAG	Software	DASY 8 V16.0.2.83	N/A	Calibration not required	Calibration not required
SPEAG	Phantom	ELI	N/A	Calibration not required	Calibration not required
LKM	Digital thermometer	DTM3000	EC14010603	Sep/27/2023	Sep/26/2024
TECEP	Digital thermometer	DTM-303A	TP190085	Dec/19/2023	Dec/18/2024

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7 UNCERTAINTY BUDGET

Measurement Uncertainty evaluation template for DUT SAR test (0.3-3G)

A	c	D	e		f	g	$h=c * f / e$	$i=c * g / e$	k
Source of Uncertainty	Tolerance/ Uncertainty	Probability Distributio	Div	Div Value	ci (1g)	ci (10g)	Standard uncertainty	Standard uncertainty	vi, or Veff
Measurement system									
Probe calibration	6.00%	N	1	1	1	1	6.00%	6.00%	∞
<i>Isotropy, Axial</i>	3.50%	R	$\sqrt{3}$	1.732	1	1	2.02%	2.02%	∞
<i>Isotropy, Hemispherical</i>	9.60%	R	$\sqrt{3}$	1.732	1	1	5.54%	5.54%	∞
Modulation Response	2.40%	R	$\sqrt{3}$	1.732	1	1	1.40%	1.40%	∞
Boundary Effect	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Linearity	4.70%	R	$\sqrt{3}$	1.732	1	1	2.71%	2.71%	∞
Detection Limits	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Readout Electronics	0.30%	N	1	1	1	1	0.30%	0.30%	∞
Response time	0.80%	R	$\sqrt{3}$	1.732	1	1	0.46%	0.46%	∞
Integration Time	2.60%	R	$\sqrt{3}$	1.732	1	1	1.50%	1.50%	∞
Measurement drift (class A evaluation)	1.75%	R	$\sqrt{3}$	1.732	1	1	1.01%	1.01%	∞
RF ambient condition - noise	3.00%	R	$\sqrt{3}$	1.732	1	1	1.73%	1.73%	∞
RF ambient conditions - reflections	3.00%	R	$\sqrt{3}$	1.732	1	1	1.73%	1.73%	∞
Probe positioner Mechanical restrictions	0.40%	R	$\sqrt{3}$	1.732	1	1	0.23%	0.23%	∞
Probe Positioning with respect to phantom shell	2.90%	R	$\sqrt{3}$	1.732	1	1	1.67%	1.67%	∞
Post-processing	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Max SAR Eval	1.00%	R	$\sqrt{3}$	1.732	1	1	0.58%	0.58%	∞
Test Sample related									
Test sample positioning	2.90%	N	1	1	1	1	2.90%	2.90%	M-1
Device Holder Uncertainty	3.60%	N	1	1	1	1	3.60%	3.60%	M-1
Drift of output power	5.00%	R	$\sqrt{3}$	1.732	1	1	2.89%	2.89%	∞
Phantom and Setup									
Phantom Uncertainty	4.00%	R	$\sqrt{3}$	1.732	1	1	2.31%	2.31%	∞
Liquid permittivity (mea.)	0.38%	N	1	1	0.64	0.43	0.24%	0.16%	M
Liquid Conductivity (mea.)	2.93%	N	1	1	0.6	0.49	1.76%	1.44%	M
Combined standard uncertainty		RSS					11.55%	11.50%	
Expant uncertainty (95% confidence interval), K=2							23.11%	23.00%	

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8 SAR MEASUREMENT RESULTS

ID: 001

Report No. : TESA2407000436E5

Measurement Report_NFC_Front Surface_0mm

Ambient temperature: 22.4°C; Liquid temperature: 21.5°C

Exposure Conditions

Phantom Section, TSL	Position, Test Distance [mm]	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, HSL	Front Surface, 0.00	13.56,13.56	18.48	0.737	55.096

Hardware Setup

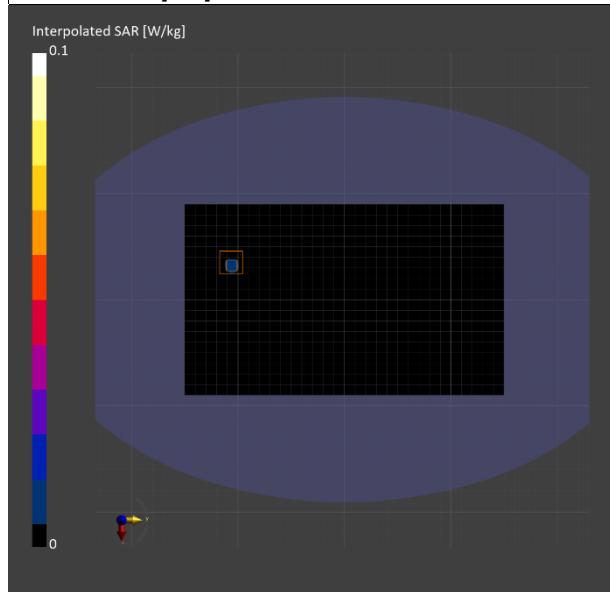
Phantom	Probe, Calibration Date	DAE, Calibration Date
ELI	EX3DV4 - SN7466, 2024-01-22	DAE4 Sn547, 2024-01-18

Scans Setup

	Area Scan	Zoom Scan
Grid Extents [mm]	180.0 x 300.0	30.0 x 30.0 x 30.0
Grid Steps [mm]	15.0 x 15.0	6.0 x 6.0 x 1.5
Sensor Surface [mm]	3.0	1.4

Measurement Results

	Area Scan	Zoom Scan
Date	2024-07-09	2024-07-09
psSAR1g [W/kg]	0.009	0.008
psSAR8g [W/kg]	0.007	0.004
psSAR10g [W/kg]	0.007	0.003
Power Drift [dB]	-0.03	0.05
M2/M1 [%]		55.8
Dist 3dB Peak [mm]		8.1



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9 SAR SYSTEM CHECK RESULTS

Report No. :TESA2407000436E5

Measurement Report

Dipole_CLA13-SN: 1027

Ambient temperature: 22.4°C; Liquid temperature: 21.5°C

Exposure Conditions

Phantom Section, TSL	Position, Test Distance [mm]	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, HSL	FRONT, 0.00	18.48	0.728	55.208

Hardware Setup

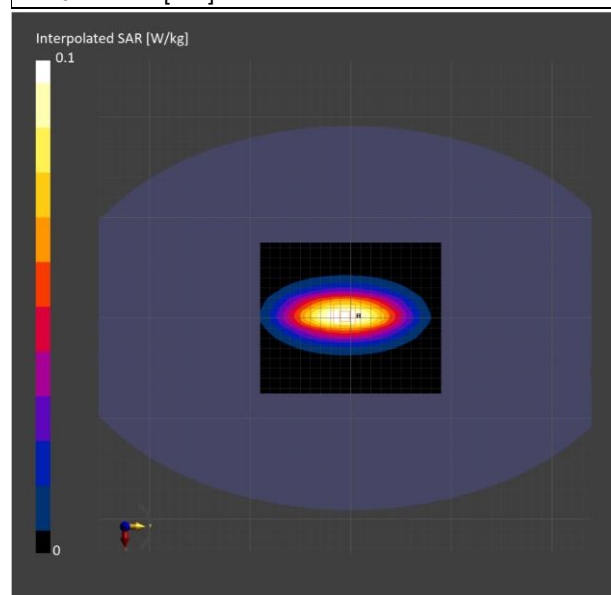
Phantom	Probe, Calibration Date	DAE, Calibration Date
ELI	EX3DV4 - SN7466, 2024-01-22	DAE4 Sn547, 2024-01-18

Scans Setup

	Area Scan	Zoom Scan
Grid Extents [mm]	270.0 x 270.0	32.0 x 32.0 x 30.0
Grid Steps [mm]	15.0 x 15.0	8.0 x 8.0 x 5.0
Sensor Surface [mm]	3.0	1.4

Measurement Results

	Area Scan	Zoom Scan
Date	2024-07-09	2024-07-09
psSAR1g [W/kg]	0.121	0.124
psSAR8g [W/kg]	0.082	0.078
psSAR10g [W/kg]	0.077	0.074
Power Drift [dB]	-0.02	0.02
M2/M1 [%]		54.3
Dist 3dB Peak [mm]		16.0



Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.

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Refer to separated files for the following appendixes.

10.1 SAR_Appendix A Photographs

10.2 SAR_Appendix B DAE & Probe Cal. Certificate

10.3 SAR_Appendix C Phantom Description & Dipole Cal. Certificate

- End of report -

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