



**中认信通**  
CHINA CERTIFICATION ICT CO., LTD (DONGGUAN)



# FCC SAR TEST REPORT

**Applicant: MAXWEST COMMUNICATION LIMITED**

Address: FLAT/RM 707 7/F, FORTRESS TOWER 250 KING'S ROAD, NORTH POINT, HONG KONG

**FCC ID: 2ASP8NEO8**

**Product Name: Phone**

**Standard(s): 47 CFR Part 2(2.1093)**

The above device has been tested and found compliant with the requirement of the relative standards by China Certification ICT Co., Ltd (Dongguan)

**Report Number: 2503Q17178E-20**

**Date Of Issue: 2025/2/19**

**Reviewed By: Ken Zong**

*Ken Zong*

Title: SAR Engineer

**Approved By: Karl Gong**

*Karl Gong*

Title: SAR Engineer

**Test Laboratory: China Certification ICT Co., Ltd (Dongguan)**

No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China

Tel: +86-769-83085888

[www.ccttt.com.cn](http://www.ccttt.com.cn)

SAR TEST RESULTSSUMMARY

Operation Frequency Bands	Highest Reported 1g SAR (W/kg)		Limits (W/kg)
	Head SAR	Body SAR (Gap 5mm)	
GSM 850	0.49	0.72	1.6
PCS 1900	0.38	0.57	
Maximum Simultaneous Transmission SAR			
Items	Head SAR	Body SAR (Gap 5mm)	Limits
Sum SAR(W/kg)	0.68	0.91	1.6
SPLSR	NA	NA	0.04
EUT Received Date:	2025/02/03		
Tested Date:	2025/02/18		
Tested Result:	Pass		

## **Test Facility**

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No. : 442868, the FCC Designation No. : CN1314.

## **Declarations**

China Certification ICT Co., Ltd (Dongguan) is not responsible for the authenticity of any test data provided by the applicant. Data included from the applicant that may affect test results are marked with a triangle symbol “▲”. Customer model name, addresses, names, trademarks etc. are not considered data.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested.

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Each test item follows the test standard(s) without deviation.

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	2503Q17178E-20	Original Report	2025/2/19

## 1. GENERAL INFORMATION

### 1.1 Product Description for Device under Test (EUT)

<b>EUT Name:</b>	Phone
<b>EUT Model:</b>	NEO 8
<b>Device Type:</b>	Portable
<b>Exposure Category:</b>	Population / Uncontrolled
<b>Antenna Type(s):</b>	Internal Antenna
<b>Body-Worn Accessories:</b>	None
<b>Proximity Sensor:</b>	None
<b>Operation modes:</b>	GSM Voice, GPRS Data, Bluetooth
<b>Frequency Band:</b>	GSM 850: 824-849 MHz(TX); 869-894 MHz(RX) PCS 1900: 1850-1910 MHz(TX); 1930-1990 MHz(RX) Bluetooth: 2402-2480MHz(TX/RX)
<b>Rated Input Voltage:</b>	DC3.7V from Rechargeable Battery
<b>Serial Number:</b>	2Y6U-1
<b>Normal Operation:</b>	Head and Body

## **1.2 Test Specification, Methods and Procedures**

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

KDB 447498 D01 General RF Exposure Guidance v06  
KDB 648474 D04 Handset SAR v01r03  
KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04  
KDB 865664 D02 RF Exposure Reporting v01r02

TCB Workshop April 2019:RF Exposure Procedures



### 1.3 SAR Limits

#### FCC Limit

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	<b>1.60</b>	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

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

Occupational/Controlled Environments are defined as locations where there is exposure that maybe incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

General Population/Uncontrolled environments Spatial Peak limit 1.6W/kg for 1g SAR applied to the EUT.

## 1.4 FACILITIES

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The test sites and measurement facilities used to collect data are located at:

<input checked="" type="checkbox"/> SAR Lab 1	<input type="checkbox"/> SAR Lab 2
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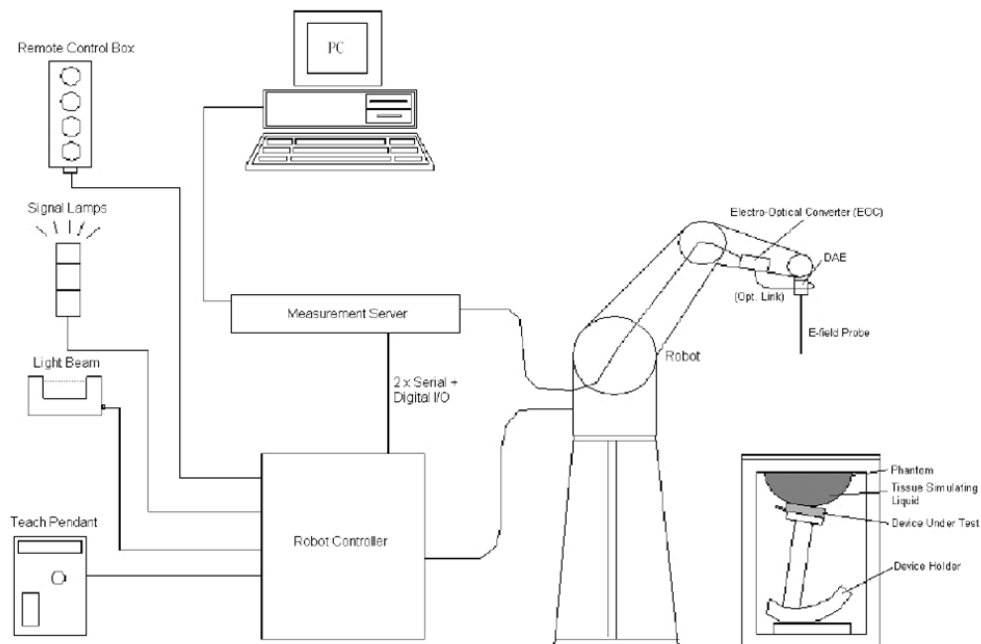
## 2. SAR MEASUREMENTSYSTEM

These measurements were performed with the automated near-field scanning system DASY5 from Schmid & Partner Engineering AG (SPEAG) which is the Fifth generation of the system shown in the figure hereinafter:



### DASY5 System Description

The DASY5 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 application, 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 Win7 professional operating system and the DASY52 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.

### **DASY5 Measurement Server**

The DASY5 measurement server is based on a PC/104 CPU board with a 400MHz Intel ULVCeleron, 128MB chip-disk and 128MB RAM. The necessary circuits for communication with the DAE4 (or DAE3) electronics box, as well as the 16 bit AD-converter system for optical detection and digital I/O interface are contained on the DASY5 I/O board, which is directly connected to the PC/104 bus of the CPU board.



The measurement server performs all real-time data evaluation of field measurements and surface detection, controls robot movements and handles safety operation. The PC operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with an expansion port which is reserved for future applications. Please note that this expansion port does not have a standardized point out, and therefore only devices provided by SPEAG can be connected. Devices from any other supplier could seriously damage the measurement server.

### **Data Acquisition Electronics**

The data acquisition electronics (DAE4) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.

The mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of both the DAE4 as well as of the DAE3 box is 200M $\Omega$ ; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

**EX3DV4 E-Field Probes**

<b>Frequency</b>	4 MHz - 10 GHz Linearity: $\pm 0.2$ dB (30 MHz to 10 GHz)
<b>Directivity</b>	$\pm 0.1$ dB in TSL (rotation around probe axis) $\pm 0.3$ dB in TSL (rotation normal to probe axis)
<b>Dynamic Range</b>	10 $\mu$ W/g to > 100 mW/g Linearity: $\pm 0.2$ dB (noise: typically < 1 $\mu$ W/g)
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
<b>Application</b>	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
<b>Compatibility</b>	DASY3, DASY4, DASY52, DASY6, DASY8 SAR, EASY6, EASY4/MRI

**Calibration Frequency Points for EX3DV4 E-Field Probes SN: 7329 Calibrated: 2024/3/27**

Calibration Frequency Point(MHz)	Frequency Range(MHz)		Conversion Factor		
	From	To	X	Y	Z
750 Head	650	810	8.79	10.07	9.05
900 Head	810	1000	8.42	9.50	8.93
1750 Head	1650	1810	7.56	8.56	7.71
1900 Head	1810	2000	7.37	8.32	7.54
2300 Head	2200	2399	7.21	8.13	7.41
2450 Head	2399	2500	7.05	7.92	7.22
2600 Head	2500	2700	6.91	7.77	7.08
5250 Head	5140	5360	4.96	5.61	5.16
5600 Head	5490	5675	4.38	4.98	4.56
5750 Head	5675	5860	4.54	5.16	4.70

### **SAM Twin Phantom**

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region, where shell thickness increases to 6 mm). The phantom has three measurement areas:

- \_ Left Head
- \_ Right Head
- \_ Flat phantom

The phantom table for the DASY systems based on the robots have the size of 100 x 50 x 85 cm (L x W x H). For easy dislocation these tables have fork lift cut outs at the bottom.

The bottom plate contains three pairs of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. Only one device holder is necessary if two phantoms are used (e.g., for different liquids)



A white cover is provided to cover the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on top of this phantom cover are possible. Three reference marks are provided on the phantom counter. These reference marks are used to teach the absolute phantom position relative to the robot.

### **Robots**

The DASY5 system uses the high precision industrial robot. The robot offers the same features important for our application:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchrony motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)

The above mentioned robots are controlled by the Staubli CS8c robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is contained on the CDs delivered along with the robot. Paper manuals are available upon request direct from Staubli.

## SAR Scan Procedures

### Step 1: 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. The minimum distance of probe sensors to surface is 1.4 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

### Step 2: Area Scans

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 15mm<sup>2</sup> step integral, with 1.5mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

Area Scan Parameters extracted from 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 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

### Step 3: Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of  $1000 \text{ kg/m}^3$  is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 5mm, with the side length of the 10g cube is 21.5mm.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

			$\leq 3 \text{ GHz}$	$> 3 \text{ GHz}$
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			$\leq 2 \text{ GHz}: \leq 8 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz}: \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz}: \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 4 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 3 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
	graded grid	$\Delta z_{\text{Zoom}}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 3 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
		$\Delta z_{\text{Zoom}}(n>1)$ : between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1) \text{ mm}$	
Minimum zoom scan volume	x, y, z		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz}: \geq 28 \text{ mm}$ $4 - 5 \text{ GHz}: \geq 25 \text{ mm}$ $5 - 6 \text{ GHz}: \geq 22 \text{ mm}$
Note: $\delta$ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 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 Publication 447498 is $\leq 1.4 \text{ W/kg}$ , $\leq 8 \text{ mm}$ , $\leq 7 \text{ mm}$ and $\leq 5 \text{ mm}$ zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

### Step 4: Power Drift Measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of  $7 \times 7 \times 7$  (5mmx5mmx5mm) providing a volume of 30 mm in the X & Y & Z axis.



### Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEC 62209-1:2016

### Recommended Tissue Dielectric Parameters for Head liquid

**Table A.3 – Dielectric properties of the head tissue-equivalent liquid**

Frequency MHz	Relative permittivity $\epsilon_r$	Conductivity ( $\sigma$ ) S/m
300	45,3	0,87
450	43,5	0,87
<i>750</i>	<i>41,9</i>	<i>0,89</i>
835	41,5	0,90
900	41,5	0,97
1 450	40,5	1,20
<i>1 500</i>	<i>40,4</i>	<i>1,23</i>
<i>1 640</i>	<i>40,2</i>	<i>1,31</i>
<i>1 750</i>	<i>40,1</i>	<i>1,37</i>
1 800	40,0	1,40
1 900	40,0	1,40
2 000	40,0	1,40
<i>2 100</i>	<i>39,8</i>	<i>1,49</i>
<i>2 300</i>	<i>39,5</i>	<i>1,67</i>
2 450	39,2	1,80
<i>2 600</i>	<i>39,0</i>	<i>1,96</i>
3 000	38,5	2,40
<i>3 500</i>	<i>37,9</i>	<i>2,91</i>
<i>4 000</i>	<i>37,4</i>	<i>3,43</i>
<i>4 500</i>	<i>36,8</i>	<i>3,94</i>
<i>5 000</i>	<i>36,2</i>	<i>4,45</i>
<i>5 200</i>	<i>36,0</i>	<i>4,66</i>
<i>5 400</i>	<i>35,8</i>	<i>4,86</i>
<i>5 600</i>	<i>35,5</i>	<i>5,07</i>
<i>5 800</i>	<i>35,3</i>	<i>5,27</i>
<i>6 000</i>	<i>35,1</i>	<i>5,48</i>

NOTE For convenience, permittivity and conductivity values at those frequencies which are not part of the original data provided by Drossos et al. [33] or the extension to 5 800 MHz are provided (i.e. the values shown *in italics*). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6 000 MHz that were linearly extrapolated from the values at 3 000 MHz and 5 800 MHz.

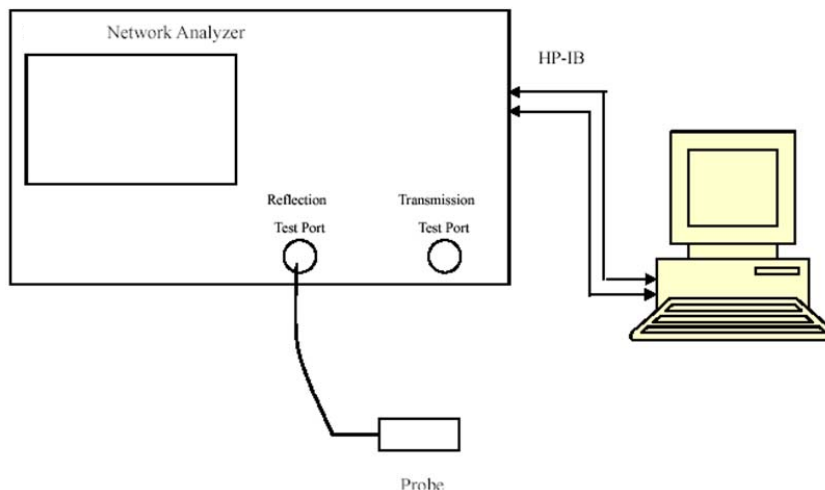
### 3. EQUIPMENT LIST AND CALIBRATION

#### 3.1 Equipments List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
DASY5 Test Software	DASY52.10	N/A	NCR	NCR
DASY5 Measurement Server	DASY5 4.5.12	1567	NCR	NCR
Data Acquisition Electronics	DAE4	1354	2024/12/3	2025/12/2
E-Field Probe	EX3DV4	7329	2024/3/27	2025/3/26
Mounting Device	MD4HHTV5	BJPCTC0152	NCR	NCR
Twin SAM	Twin SAM V5.0	1412	NCR	NCR
Dipole, 900 MHz	D900V2	1d217	2023/3/24	2026/3/23
Dipole, 1900 MHz	D1900V2	5d251	2023/3/27	2026/3/26
Simulated Tissue Liquid Head(500-9500 MHz)	HBBL600-10000V6	220420-2	Each Time	/
Network Analyzer	8753B	2828A00170	2024/10/17	2025/10/16
Dielectric assessment kit	1319	SM DAK 040 CA	NCR	NCR
MXG Vector Signal Generator	N5182B	MY51350144	2024/4/1	2025/3/31
Power Meter	ML2495A	1106009	2024/8/29	2025/8/28
USB Power Sensor	U2001H	MY50000432	2024/4/1	2025/3/31
Power Amplifier	ZHL-5W-202-S+	416402204	NCR	NCR
Power Amplifier	ZVE-6W-83+	637202210	NCR	NCR
Directional Coupler	441493	520Z	NCR	NCR
Attenuator	20dB, 100W	LN749	NCR	NCR
Attenuator	6dB, 150W	2754	NCR	NCR
Thermometer	DTM3000	3892	2024/4/1	2025/3/31
Thermohygrometer	HTC-1	N/A	2024/4/1	2025/3/31
Radio Communication Analyzer	MT8820C	6201181458	2024/4/1	2025/3/31
Spectrum Analyzer	FSU26	100147	2024/4/1	2025/3/31

## 4. SAR MEASUREMENT SYSTEM VERIFICATION

### 4.1 Liquid Verification



Liquid Verification Setup Block Diagram

### Liquid Verification Results

Frequency (MHz)	LiquidType	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
810	Simulated Tissue Liquid Head	42.932	0.886	41.62	0.9	3.15	-1.56	$\pm 5$
820	Simulated Tissue Liquid Head	42.864	0.894	41.57	0.9	3.11	-0.67	$\pm 5$
830	Simulated Tissue Liquid Head	42.834	0.907	41.52	0.9	3.16	0.78	$\pm 5$
840	Simulated Tissue Liquid Head	42.561	0.914	41.5	0.91	2.56	0.44	$\pm 5$
850	Simulated Tissue Liquid Head	42.431	0.926	41.5	0.92	2.24	0.65	$\pm 5$
860	Simulated Tissue Liquid Head	42.426	0.932	41.5	0.93	2.23	0.22	$\pm 5$
870	Simulated Tissue Liquid Head	42.385	0.948	41.5	0.94	2.13	0.85	$\pm 5$
880	Simulated Tissue Liquid Head	42.322	0.959	41.5	0.95	1.98	0.95	$\pm 5$
890	Simulated Tissue Liquid Head	42.156	0.976	41.5	0.96	1.58	1.67	$\pm 5$
900	Simulated Tissue Liquid Head	42.081	0.987	41.5	0.97	1.4	1.75	$\pm 5$

\*Liquid Verification above was performed on 2025/02/18.

Frequency (MHz)	LiquidType	Liquid Parameter		Target Value		Delta (%)		Toleran ce (%)
		$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
1850	Simulated Tissue Liquid Head	40.975	1.352	40	1.4	2.44	-3.43	$\pm 5$
1860	Simulated Tissue Liquid Head	40.684	1.361	40	1.4	1.71	-2.79	$\pm 5$
1870	Simulated Tissue Liquid Head	40.607	1.366	40	1.4	1.52	-2.43	$\pm 5$
1880	Simulated Tissue Liquid Head	40.546	1.382	40	1.4	1.37	-1.29	$\pm 5$
1890	Simulated Tissue Liquid Head	40.343	1.387	40	1.4	0.86	-0.93	$\pm 5$
1900	Simulated Tissue Liquid Head	40.165	1.399	40	1.4	0.41	-0.07	$\pm 5$
1910	Simulated Tissue Liquid Head	40.116	1.408	40	1.4	0.29	0.57	$\pm 5$
1920	Simulated Tissue Liquid Head	39.717	1.413	40	1.4	-0.71	0.93	$\pm 5$
1930	Simulated Tissue Liquid Head	39.658	1.417	40	1.4	-0.85	1.21	$\pm 5$
1940	Simulated Tissue Liquid Head	39.55	1.425	40	1.4	-1.13	1.79	$\pm 5$
1950	Simulated Tissue Liquid Head	39.356	1.433	40	1.4	-1.61	2.36	$\pm 5$

\*Liquid Verification above was performed on 2025/02/18.

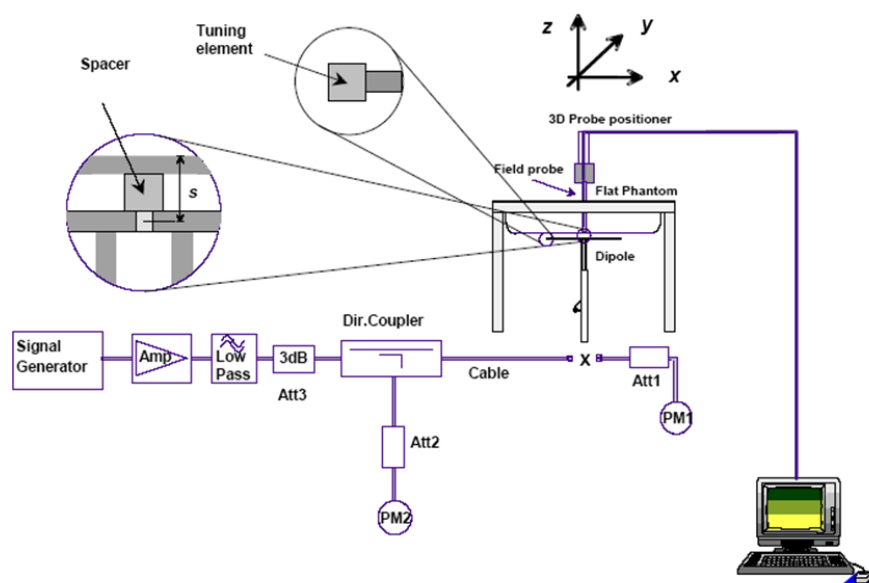
## 4.2 System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of  $\pm 10\%$ . The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

The spacing distances in the **System Verification Setup Block Diagram** is given by the following:

- $s = 15 \text{ mm} \pm 0,2 \text{ mm}$  for  $300 \text{ MHz} \leq f \leq 1\,000 \text{ MHz}$ ;
- $s = 10 \text{ mm} \pm 0,2 \text{ mm}$  for  $1\,000 \text{ MHz} < f \leq 3\,000 \text{ MHz}$ ;
- $s = 10 \text{ mm} \pm 0,2 \text{ mm}$  for  $3\,000 \text{ MHz} < f \leq 6\,000 \text{ MHz}$ .

### System Verification Setup Block Diagram



### System Accuracy Check Results

Date	Frequency Band	Liquid Type	Input Power (mW)	Measured SAR (W/kg)		Normalized to 1W (W/kg)	Target Value (W/kg)	Delta (%)	Tolerance (%)
2025/02/18	900	Simulated Tissue Liquid Head	100	1g	1.16	11.6	10.9	6.42	$\pm 10$
2025/02/18	1900	Simulated Tissue Liquid Head	100	1g	4.15	41.5	38.9	6.68	$\pm 10$

\*The SAR values above are normalized to 1 Watt forward power.

### 4.3 SAR SYSTEM VALIDATION DATA

#### System Performance 900MHz

**DUT: D900V2; Type: 900 MHz; Serial: 1d217**

Communication System: CW; Frequency: 900 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 900$  MHz;  $\sigma = 0.987$  S/m;  $\epsilon_r = 42.081$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(8.42, 9.5, 8.93) @900 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2023/11/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (5x10x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 1.48 W/kg

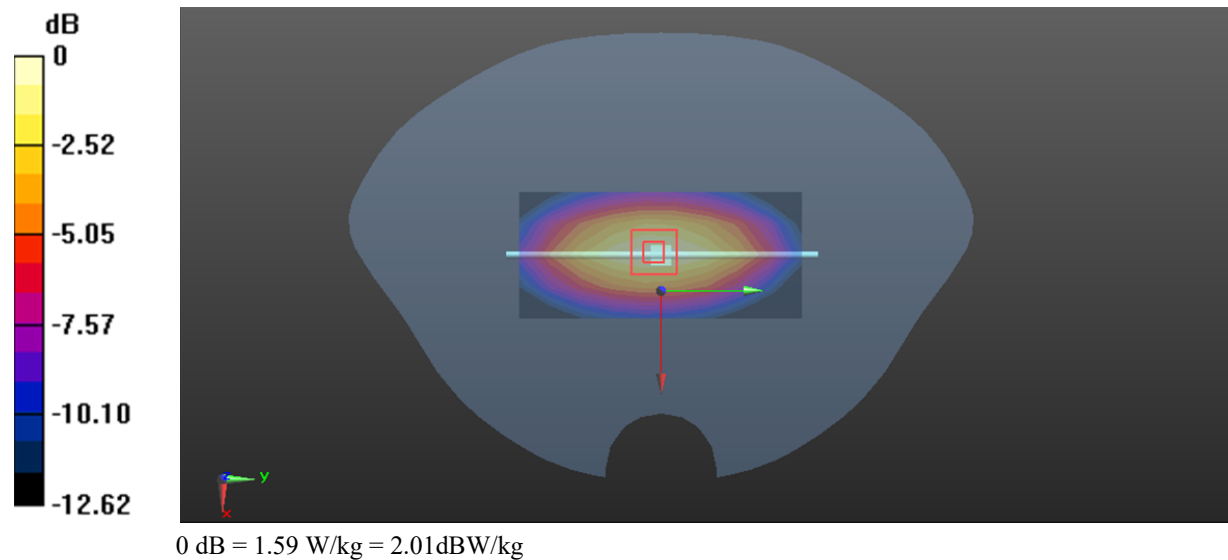
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 35.26 V/m; Power Drift = 0.18 dB

Peak SAR (extrapolated) = 1.74 W/kg

**SAR(1 g) = 1.16 W/kg; SAR(10 g) = 0.744 W/kg**

Maximum value of SAR (measured) = 1.59 W/kg



**System Performance 1900MHz Head****DUT: D1900V2; Type: 1900 MHz; Serial: 5d251**

Communication System: CW; Frequency: 1900 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 1900$  MHz;  $\sigma = 1.399$  S/m;  $\epsilon_r = 40.165$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.37, 8.32, 7.54) @1900 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2023/11/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (5x6x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 6.82 W/kg

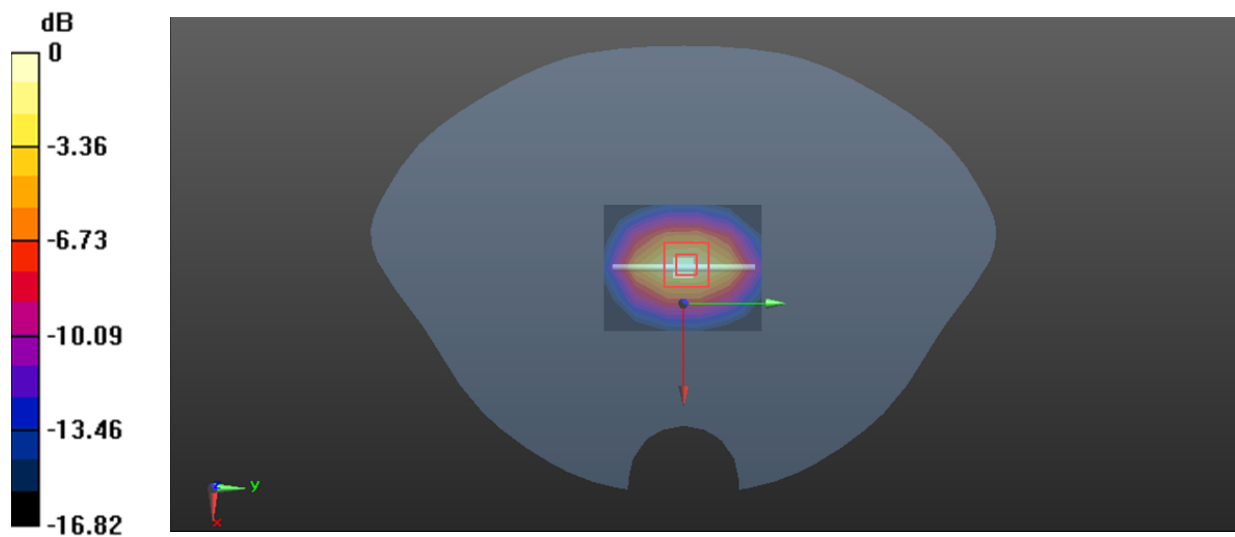
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 56.74 V/m; Power Drift = -0.06 dB

Peak SAR (extrapolated) = 7.84 W/kg

**SAR(1 g) = 4.15 W/kg; SAR(10 g) = 2.18 W/kg**

Maximum value of SAR (measured) = 6.47 W/kg



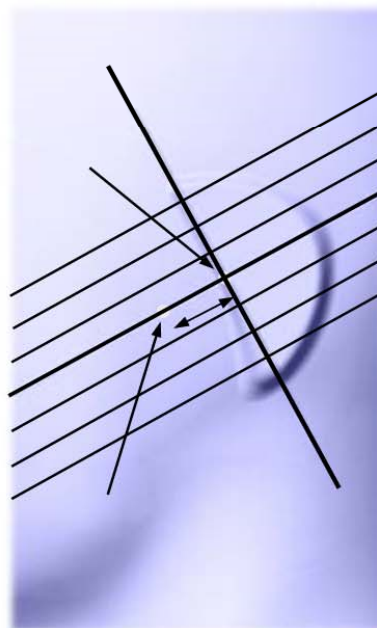
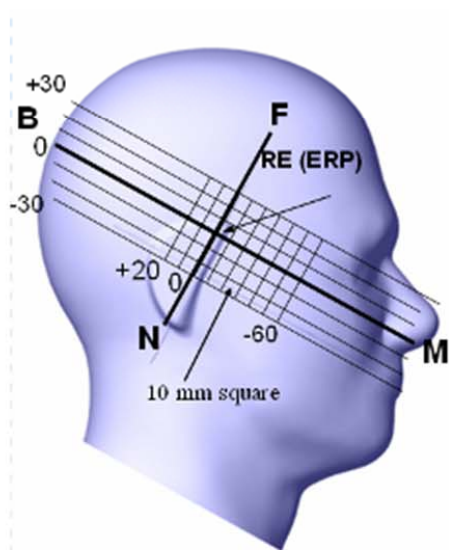
0 dB = 6.47 W/kg = 8.11dBW/kg

## 5. EUT TEST STRATEGY AND METHODOLOGY

### 5.1 Test Positions for Device Operating Next to a Person's Ear

This category includes most wireless handsets with fixed, retractable or internal antennas located toward the top half of the device, with or without a foldout, sliding or similar keypad cover. The handset should have its earpiece located within the upper ¼ of the device, either along the centerline or off-centered, as perceived by its users. This type of handset should be positioned in a normal operating position with the “test device reference point” located along the “vertical centerline” on the front of the device aligned to the “ear reference point”. The “test device reference point” should be located at the same level as the center of the earpiece region. The “vertical centerline” should bisect the front surface of the handset at its top and bottom edges. A “ear reference point” is located on the outer surface of the head phantom on each ear spacer. It is located 1.5 cm above the center of the ear canal entrance in the “phantom reference plane” defined by the three lines joining the center of each “ear reference point” (left and right) and the tip of the mouth.

A handset should be initially positioned with the earpiece region pressed against the ear spacer of a head phantom. For the SCC-34/SC-2 head phantom, the device should be positioned parallel to the “N-F” line defined along the base of the ear spacer that contains the “ear reference point”. For interim head phantoms, the device should be positioned parallel to the cheek for maximum RF energy coupling. The “test device reference point” is aligned to the “ear reference point” on the head phantom and the “vertical centerline” is aligned to the “phantom reference plane”. This is called the “initial ear position”. While maintaining these three alignments, the body of the handset is gradually adjusted to each of the following positions for evaluating SAR:





## 5.2 Cheek/Touch Position

The device is brought toward the mouth of the head phantom by pivoting against the “ear reference point” or along the “N-F” line for the SCC-34/SC-2 head phantom.

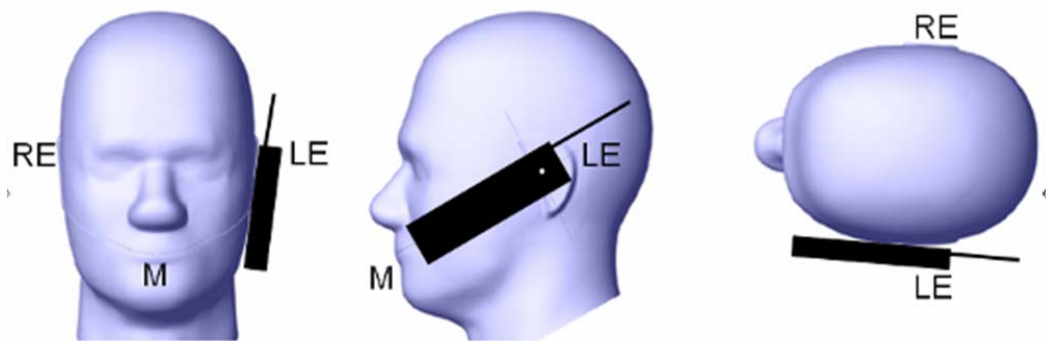
This test position is established:

When any point on the display, keypad or mouthpiece portions of the handset is in contact with the phantom.

(or) When any portion of a foldout, sliding or similar keypad cover opened to its intended self-adjusting normal use position is in contact with the cheek or mouth of the phantom.

For existing head phantoms – when the handset loses contact with the phantom at the pivoting point, rotation should continue until the device touches the cheek of the phantom or breaks its last contact from the ear spacer.

### Cheek /Touch Position



## 5.3 Ear/Tilt Position

With the handset aligned in the “Cheek/Touch Position”:

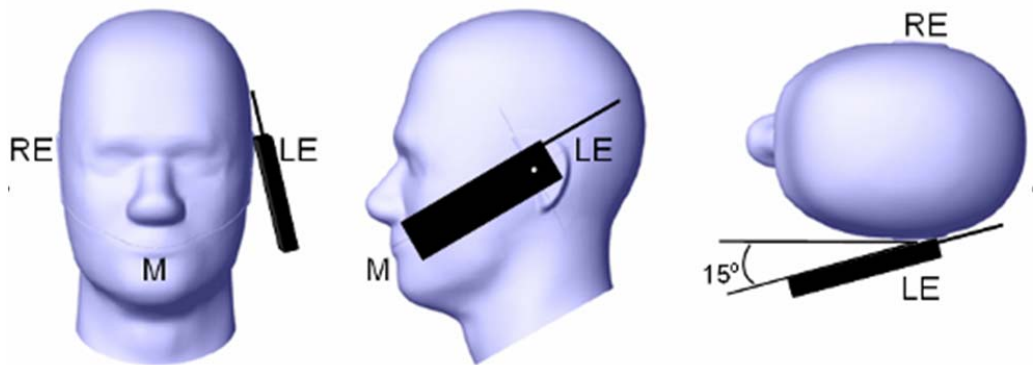
1) If the earpiece of the handset is not in full contact with the phantom’s ear spacer (in the “Cheek/Touch position”) and the peak SAR location for the “Cheek/Touch” position is located at the ear spacer region or corresponds to the earpiece region of the handset, the device should be returned to the “initial ear position” by rotating it away from the mouth until the earpiece is in full contact with the ear spacer.

2) (otherwise) The handset should be moved (translated) away from the cheek perpendicular to the line passes through both “ear reference points” (note: one of these ear reference points may not physically exist on a split head model) for approximate 2-3 cm. While it is in this position, the device handset is tilted away from the mouth with respect to the “test device reference point” until the inside angle between the vertical centerline on the front surface of the Phone and the horizontal line passing through the ear reference point is by 15° to 80°. After the tilt, it is then moved (translated) back toward the head perpendicular to the line passes through both “ear reference points” until the device touches the phantom or the ear spacer. If the antenna touches the head first, the positioning process should be repeated with a tilt angle less than 15° so that the device and its antenna would touch the phantom simultaneously. This test position may require a device holder or positioner to achieve the translation and tilting with acceptable positioning repeatability.

If a device is also designed to transmit with its keypad cover closed for operating in the head position, such positions should also be considered in the SAR evaluation. The device should be tested on the left and right side of the head phantom in the “Cheek/Touch” and “Ear/Tilt” positions. When applicable, each configuration should be tested with the antenna in its fully extended and fully retracted positions. These

test configurations should be tested at the high, middle and low frequency channels of each operating mode; for example, AMPS, CDMA, and TDMA. If the SAR measured at the middle channel for each test configuration (left, right, Cheek/Touch, Tilt/Ear, extended and retracted) is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

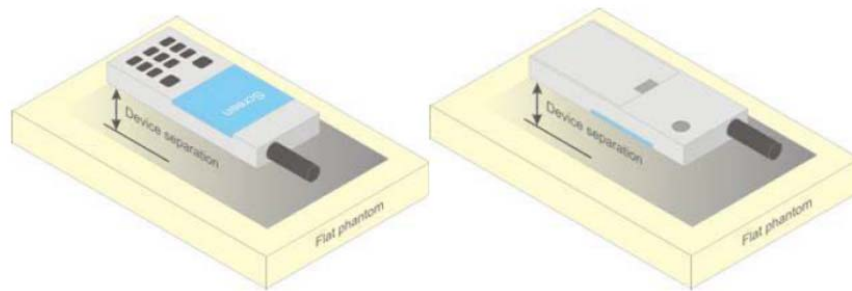
#### **Ear /Tilt 15° Position**



#### **5.4 Test positions for body-worn and other configurations**

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. Devices with a headset output should be tested with a headset connected to the device. When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., 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 must be tested.

Body-worn accessories may not always be supplied or available as options for some devices that are intended to be authorized for body-worn use. A separation distance of 1.5 cm between the back of the device and a flat phantom is recommended for testing body-worn SAR compliance under such circumstances. Other separation distances may be used, but they should not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.



**Figure 5 – Test positions for body-worn devices**

### **5.5 Test Distance for SAR Evaluation**

For Body mode the EUT(Equipment Under Test) is set 5mm away from the phantom, the test distance is 5mm.

## 5.6 SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or radiating structures of the EUT, the horizontal grid spacing was 15 mm x 15 mm, and the SAR distribution was determined by integrated grid of 1.5mm x 1.5mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 30 mm x 30 mm x 30 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.

2) The maximum Measured value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the "Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were Measured to calculate the averages.

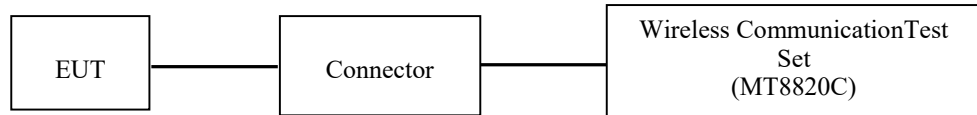
All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

## 6. CONDUCTED OUTPUT POWER MEASUREMENT

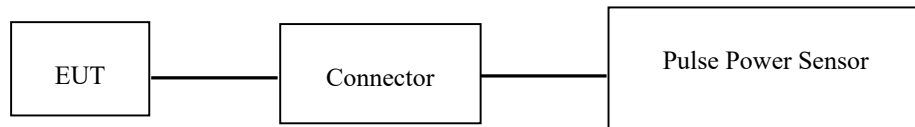
### 6.1 Test Procedure

The RF output of the transmitter was connected to the input of the Wireless Communication Test Set through Connector.



#### GSM/GPRS

The RF output of the transmitter was connected to the input port of the Pulse Power Sensor through Connector.



#### BT

## 6.2 Description of Test Configuration

### EUT Operation Condition:

<b>EUT Operation Mode:</b>	The system was configured for testing in each operation mode.
<b>Equipment Modifications:</b>	No
<b>EUT Exercise Software:</b>	No
The maximum power was configured per 3GPP Standard for each operation modes as below setting:	
GSM/GPRS	
Function: Menu select > GSM Mobile Station > GSM 850/1900	
Press Connection control to choose the different menus	
Press RESET > choose all the reset all settings	
Connection Press Signal Off to turn off the signal and change settings	
Network Support > GSM + GPRS	
Main Service > Packet Data	
Service selection > Test Mode A – Auto Slot Config. off	
MS Signal Press Slot Config Bottom on the right twice to select and change the number of time slots and power setting	
> Slot configuration > Uplink/Gamma	
> 33 dBm for GPRS 850	
> 30 dBm for GPRS 1900	
BS Signal Enter the same channel number for TCH channel (test channel) and BCCH channel	
Frequency Offset > + 0 Hz	
Mode > BCCH and TCH	
BCCH Level > -85 dBm (May need to adjust if link is not stable)	
BCCH Channel > choose desire test channel [Enter the same channel number for TCH channel (test channel) and BCCH channel]	
Channel Type > Off	
P0 > 4 dB	
Slot Config> Unchanged (if already set under MS signal)	
TCH > choose desired test channel	
Hopping > Off	
Main Timeslot > 3	
Network Coding Scheme > CS4 (GPRS)	
Bit Stream > 2E9-1 PSR Bit Stream	
AF/RF Enter appropriate offsets for Ext. Att. Output and Ext. Att. Input	
Connection Press Sign	

### 6.3 Maximum Target Output Power

Max Target Power(dBm)			
Mode/Band	Channel		
	Low	Middle	High
GSM 850	30.7	30.7	30.7
GPRS 1 TX Slot	30.7	30.7	30.7
GPRS 2 TX Slot	30.2	30.2	30.2
GPRS 3 TX Slot	26.5	26.5	26.5
GPRS 4 TX Slot	24.6	24.6	24.6
PCS 1900	27.7	27.7	27.7
GPRS 1 TX Slot	27.6	27.6	27.6
GPRS 2 TX Slot	27.5	27.5	27.5
GPRS 3 TX Slot	23.5	23.5	23.5
GPRS 4 TX Slot	21.2	21.2	21.2
Bluetooth BDR	5.0	4.5	4.0
Bluetooth EDR	6.5	6.0	5.0

**6.4 Test Results:****GSM:**

Band	Channel No.	Frequency (MHz)	RF Output Power (dBm)
GSM 850	128	824.2	30.36
	190	836.6	30.38
	251	848.8	<b>30.57</b>
PCS 1900	512	1850.2	27.30
	661	1880	27.34
	810	1909.8	<b>27.57</b>

**GPRS:**

Band	Channel No.	Frequency (MHz)	RF Output Power (dBm)			
			1 slot	2 slots	3 slots	4 slots
GSM 850	128	824.2	30.21	29.91	25.98	24.04
	190	836.6	30.25	30.00	26.11	24.19
	251	848.8	30.56	30.10	26.37	24.49
PCS 1900	512	1850.2	27.18	26.89	22.89	20.63
	661	1880	27.36	27.32	23.00	20.81
	810	1909.8	27.52	27.36	23.41	21.12

For SAR, the time based average power is relevant, the difference in between depends on the duty cycle of the TDMA signal.

Number of Time slot	1	2	3	4
Duty Cycle	1:8	1:4	1:2.66	1:2
Time based Ave. power compared to slotted Ave. power	-9 dB	-6 dB	-4.25 dB	-3 dB
Crest Factor	8	4	2.66	2



**The time based average power for GPRS**

Band	Channel No.	Frequency (MHz)	Time based average Power (dBm)			
			1 slot	2 slot	3 slots	4 slots
GSM 850	128	824.2	21.21	23.91	21.73	21.04
	190	836.6	21.25	24	21.86	21.19
	251	848.8	21.56	<b>24.1</b>	22.12	21.49
PCS 1900	512	1850.2	18.18	20.89	18.64	17.63
	661	1880	18.36	21.35	18.75	17.81
	810	1909.8	18.52	<b>21.36</b>	19.16	18.12

**Note:**

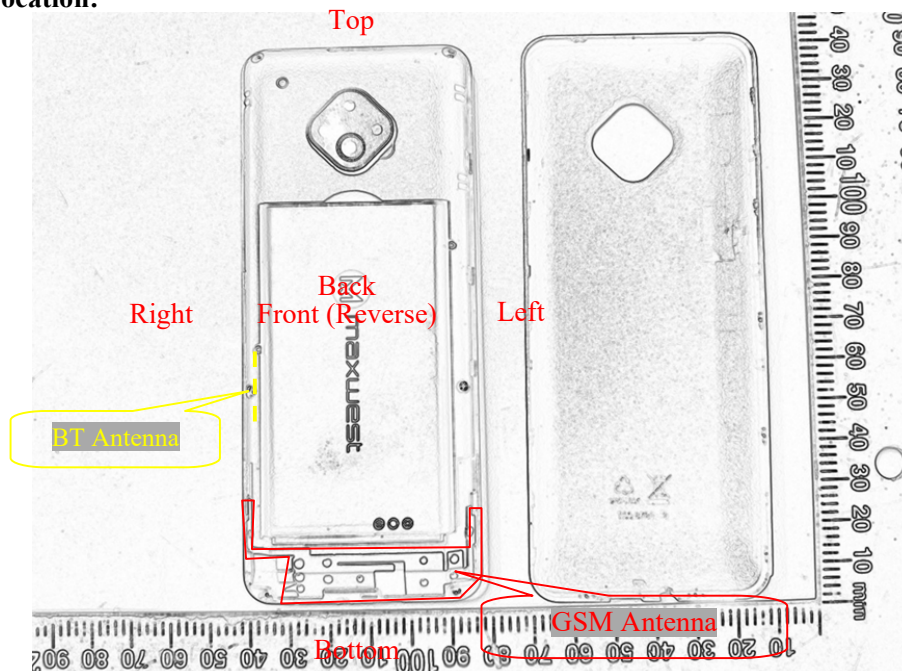
1. Radio Communication Analyzer (MT8820C) was used for the measurement of GSM peak and average output power for active timeslots.
2. For GSM voice, 1 timeslot has been activated with power level 5 (850 MHz band) and 0 (1900 MHz band).
3. For GPRS, 1, 2, 3 and 4 timeslots has been activated separately with power level 3(850 MHz band) and 3(1900 MHz band).

**Bluetooth:**

Mode	Channel frequency (MHz)	RF Output Power(dBm)
BDR(GFSK)	2402	4.92
	2441	4.11
	2480	3.85
EDR( $\pi/4$ -DQPSK)	2402	5.89
	2441	5.12
	2480	4.47
EDR(8DPSK)	2402	<b>6.38</b>
	2441	5.62
	2480	4.81

## 7. Standalone SAR test exclusion considerations

### Antennas Location:



### 7.1 Standalone SAR test exclusion considerations

Mode	Frequency (MHz)	Output Power (dBm)	Output Power (mW)	Distance (mm)	Calculated value	Threshold (1-g)	SAR Test Exclusion
Bluetooth	2480	6.5	4.47	0	1.4	3.0	YES

**Note:** The bluetooth based peak power for calculation.

### NOTE:

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

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot$

$[\sqrt{f(\text{GHz})}] \leq 3.0$  for 1-g SAR and  $\leq 7.5$  for 10-g extremity SAR, where

1.  $f(\text{GHz})$  is the RF channel transmit frequency in GHz.

2. Power and distance are rounded to the nearest mW and mm before calculation.

3. The result is rounded to one decimal place for comparison.

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

### 7.2 Standalone SAR estimation:

Mode	Frequency (MHz)	Output Power (dBm)	Output Power (mW)	Distance (mm)	Estimated 1-g (W/kg)
BT Head	2480	6.5	4.47	0	0.19
BT Body	2480	6.5	4.47	5	0.19

**Note:** The bluetooth based peak power for calculation.

When standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

$$\left[ \frac{\text{max. power of channel, including tune-up tolerance, mW}}{\text{min. test separation distance, mm}} \right] \cdot \left[ \sqrt{f(\text{GHz})} / x \right]$$

W/kg for test separation distances  $\leq 50$  mm;

where  $x = 7.5$  for 1-g SAR.

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

## 8. SAR MEASUREMENT RESULTS

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This page summarizes the results of the performed dosimetric evaluation.

### 8.1 SAR Test Data

#### Environmental Conditions

Temperature:	22.1-23.3℃
Relative Humidity:	52%
ATM Pressure:	101.4kPa
Test Date:	2025/02/18

*Testing was performed by Wen Cheng, Aixlee Li.*

**GSM 850:**

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)			
					Scaled Factor	Meas. SAR	Scaled SAR	Plot
Head Left Cheek	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.458	0.49	1#
	848.8	GSM	/	/	/	/	/	/
Head Left Tilt	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.19	0.20	/
	848.8	GSM	/	/	/	/	/	/
Head Right Cheek	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.439	0.47	/
	848.8	GSM	/	/	/	/	/	/
Head Right Tilt	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.245	0.26	/
	848.8	GSM	/	/	/	/	/	/
Body Worn Front (5mm)	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.626	0.67	/
	848.8	GSM	/	/	/	/	/	/
Body Worn Back (5mm)	824.2	GSM	/	/	/	/	/	/
	836.6	GSM	30.38	30.7	1.076	0.665	0.72	2#
	848.8	GSM	/	/	/	/	/	/
Body Front (5mm)	824.2	GPRS	/	/	/	/	/	/
	836.6	GPRS	30	30.2	1.047	0.276	0.29	/
	848.8	GPRS	/	/	/	/	/	/
Body Back (5mm)	824.2	GPRS	/	/	/	/	/	/
	836.6	GPRS	30	30.2	1.047	0.499	0.52	/
	848.8	GPRS	/	/	/	/	/	/
Body Bottom (5mm)	824.2	GPRS	/	/	/	/	/	/
	836.6	GPRS	30	30.2	1.047	0.101	0.11	/
	848.8	GPRS	/	/	/	/	/	/

*The data above was performed on 2025/02/18.*

**Note:**

1. When the 1-g SAR is  $\leq 0.8\text{W/Kg}$ , testing for other channels are optional.
2. The EUT transmit and receive through the same GSM antenna while testing SAR.
3. When SAR or MPE is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance.
4. When the maximum output power variation across the required test channels is  $> 0.5\text{ dB}$ , instead of the middle channel, the highest output power channel must be used.
5. The Multi-slot Classes of EUT is Class 12 which has maximum 4 Downlink slots and 4 Uplink slots, the maximum active slots is 5, when perform the multiple slots scan, 3DL+2UL is the worst case.

**PCS 1900:**

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)			
					Scaled Factor	Meas. SAR	Scaled SAR	Plot
Head Left Cheek	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.354	0.38	3#
	1909.8	GSM	/	/	/	/	/	/
Head Left Tilt	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.079	0.09	/
	1909.8	GSM	/	/	/	/	/	/
Head Right Cheek	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.329	0.36	/
	1909.8	GSM	/	/	/	/	/	/
Head Right Tilt	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.107	0.12	/
	1909.8	GSM	/	/	/	/	/	/
Body Worn Front (5mm)	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.314	0.34	/
	1909.8	GSM	/	/	/	/	/	/
Body Worn Back (5mm)	1850.2	GSM	/	/	/	/	/	/
	1880	GSM	27.34	27.7	1.086	0.458	0.50	/
	1909.8	GSM	/	/	/	/	/	/
Body Front (5mm)	1850.2	GPRS	/	/	/	/	/	/
	1880	GPRS	27.32	27.5	1.042	0.311	0.32	/
	1909.8	GPRS	/	/	/	/	/	/
Body Back (5mm)	1850.2	GPRS	/	/	/	/	/	/
	1880	GPRS	27.32	27.5	1.042	0.551	0.57	4#
	1909.8	GPRS	/	/	/	/	/	/
Body Bottom (5mm)	1850.2	GPRS	/	/	/	/	/	/
	1880	GPRS	27.32	27.5	1.042	0.313	0.33	/
	1909.8	GPRS	/	/	/	/	/	/

*The data above was performed on 2025/02/18.*

**Note:**

1. When the 1-g SAR is  $\leq 0.8\text{W/Kg}$ , testing for other channels are optional.
2. The EUT transmit and receive through the same GSM antenna while testing SAR.
3. When SAR or MPE is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance.
4. When the maximum output power variation across the required test channels is  $> 0.5\text{ dB}$ , instead of the middle channel, the highest output power channel must be used.
5. The Multi-slot Classes of EUT is Class 12 which has maximum 4 Downlink slots and 4 Uplink slots, the maximum active slots is 5, when perform the multiple slots scan, 3DL+2UL is the worst case.

## 9. Measurement Variability

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz v01. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results

- 1) Repeated measurement is not required when the original highest measured SAR is  $< 0.80$  W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is  $> 1.20$  or when the original or repeated measurement is  $\geq 1.45$  W/kg ( $\sim 10\%$  from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is  $\geq 1.5$  W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is  $> 1.20$ .

*Note: 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.*

### The Highest Measured SAR Configuration in Each Frequency Band

#### Head

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		Largest toSmallestS ARRatio
				Original	Repeated	
/	/	/	/	/	/	/

#### Body

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		Largest toSmallestS ARRatio
				Original	Repeated	
/	/	/	/	/	/	/

#### Note:

1. Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not  $> 1.20$ .
2. The measured SAR results **do not** have to be scaled to the maximum tune-up tolerance to determine if repeated measurements are required.
3. SAR measurement variability must be assessed for each frequency band, which is determined by the **SAR probe calibration point and tissue-equivalent medium** used for the device measurements.



## 10. DUT HOLDER PERTURBATIONS

In accordance with TCB workshop October 2016:

- 1) SAR perturbation due to test device holders, depending on antenna locations, buttons locations on phones or device, form factor (e.g. dongles etc.), the measured SAR could be influenced by the relative positions of the test device and its holder
- 2) SAR measurement standards have included protocols to evaluate this with a flat phantom, with and without the device holder
- 3) When the highest reported SAR of an antenna is  $> 1.2$  W/kg, holder perturbation verification is required for each antenna, using the highest SAR configuration among all applicable frequency bands in the same exact device and holder positions used for head and body SAR measurements; i.e. same device/button locations in the holder

Per IEEE 1528: 2013/Annex E/E.4.1.1: Device holder perturbation tolerance for a specific test device: Type B

When it is unknown if a device holder perturbs the fields of a test device, the SAR uncertainty shall be assessed with a flat phantom (see Clause 5) by comparing the SAR with and without the device holder according to the following tests:

The SAR tolerance for device holder disturbance is computed using Equation (E.21) and entered in the corresponding row of the appropriate uncertainty table with an assumed rectangular probability distribution and  $\nu = \infty$  degrees of freedom:

$$SAR_{\text{tolerance}} [\%] = 100 \times \left( \frac{SAR_{\text{w/holder}} - SAR_{\text{w/o holder}}}{SAR_{\text{w/o holder}}} \right) \quad (\text{E.21})$$

### The Highest Measured SAR Configuration among all applicable Frequency Band

Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		The Device holder perturbation uncertainty
			With holder	Without holder	
/	/	/	/	/	/

## 11. SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

### Simultaneous Transmission:

Description of Simultaneous Transmit Capabilities		
Transmitter Combination	Simultaneous?	Hotspot?
WWAN GSM + Bluetooth	√	×

### Simultaneous SAR test exclusion considerations:

Mode(SAR1+SAR2)	Position	Reported SAR(W/kg)		$\Sigma$ SAR < 1.6W/kg
		SAR1	SAR2	
WWAN GSM +Bluetooth	Head	0.49	0.19	0.68
	Body	0.72	0.19	0.91

### Conclusion:

Sum of SAR:  $\Sigma$ SAR  $\leq$  1.6 W/kg therefore simultaneous transmission SAR with Volume Scans is **not required**.

## 12. SAR Plots

### Plot 1#: GSM 850 Mid\_Head Left Cheek

**DUT: Phone; Type: NEO 8; Serial: 2Y6U-1**

Communication System: UID 0, Generic GSM (0); Frequency: 836.6 MHz; Duty Cycle: 1:8

Medium parameters used (interpolated):  $f = 836.6$  MHz;  $\sigma = 0.912$  S/m;  $\epsilon_r = 42.654$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Left Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(8.42, 9.5, 8.93) @ 836.6 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2024/12/3
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (7x9x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.532 W/kg

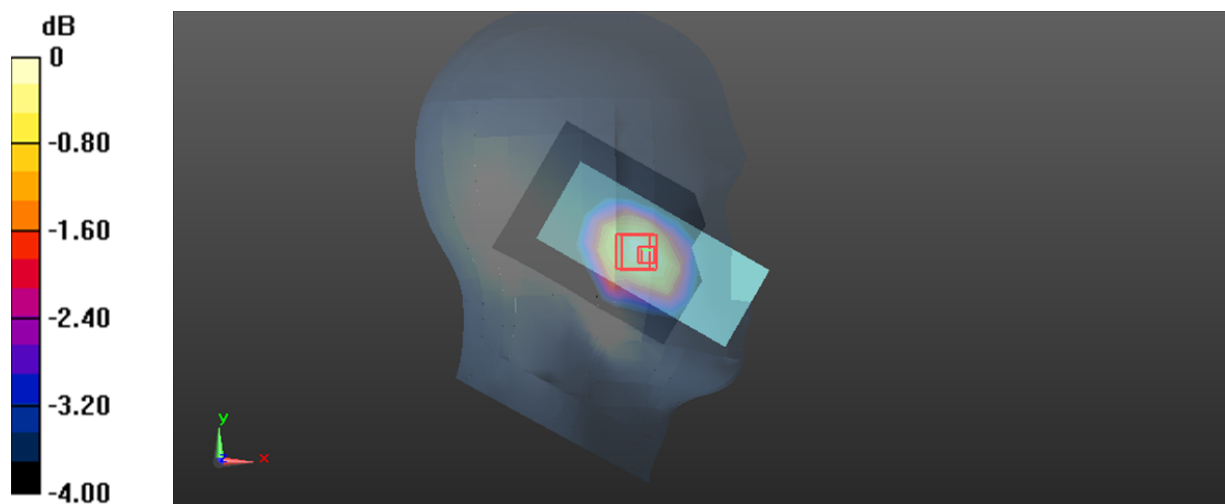
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 9.342 V/m; Power Drift = 0.14 dB

Peak SAR (extrapolated) = 0.563 W/kg

**SAR(1 g) = 0.458 W/kg; SAR(10 g) = 0.337 W/kg**

Maximum value of SAR (measured) = 0.540 W/kg



**Plot 2#: GSM 850 Mid\_Body Worn Back****DUT: Phone; Type: NEO 8; Serial: 2Y6U-1**

Communication System: UID 0, Generic GSM (0); Frequency: 836.6 MHz; Duty Cycle: 1:8  
Medium parameters used (interpolated):  $f = 836.6$  MHz;  $\sigma = 0.912$  S/m;  $\epsilon_r = 42.654$ ;  $\rho = 1000$  kg/m<sup>3</sup>  
Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(8.42, 9.5, 8.93) @ 836.6 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2024/12/3
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (7x12x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.928 W/kg

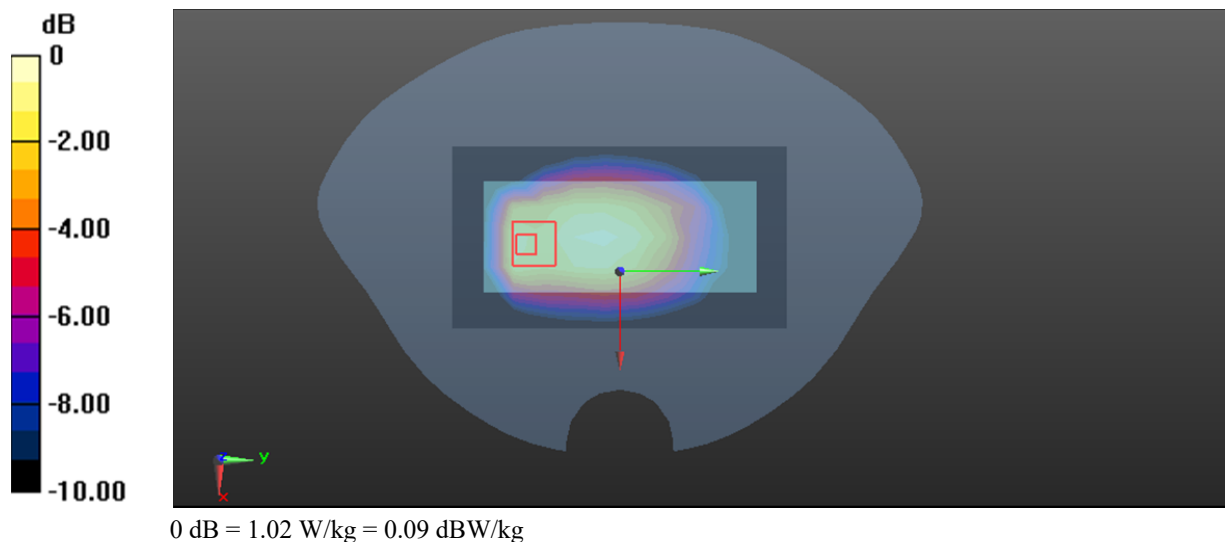
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 35.10 V/m; Power Drift = -0.12 dB

Peak SAR (extrapolated) = 1.22 W/kg

**SAR(1 g) = 0.665 W/kg; SAR(10 g) = 0.435 W/kg**

Maximum value of SAR (measured) = 1.02 W/kg



**Plot 3#: PCS 1900 Mid\_Head Left Cheek****DUT: Phone; Type: NEO 8; Serial: 2Y6U-1**

Communication System: UID 0, Generic GSM (0); Frequency: 1880 MHz; Duty Cycle: 1:8

Medium parameters used:  $f = 1880$  MHz;  $\sigma = 1.382$  S/m;  $\epsilon_r = 40.546$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Left Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.37, 8.32, 7.54) @ 1880 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2024/12/3
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (7x11x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.469 W/kg

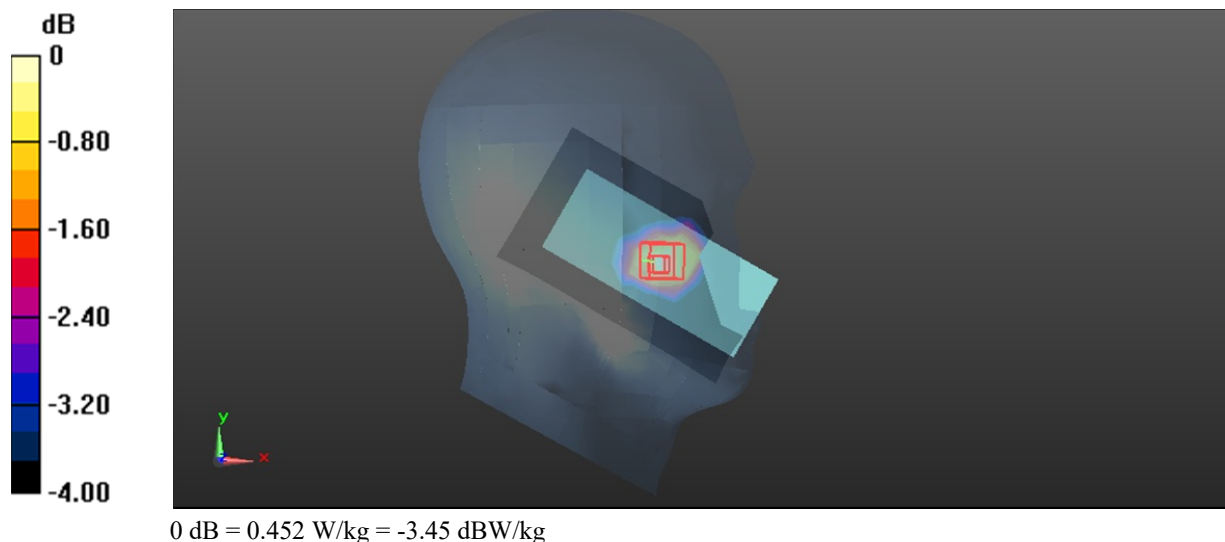
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 6.799 V/m; Power Drift = -0.00 dB

Peak SAR (extrapolated) = 0.521 W/kg

**SAR(1 g) = 0.354 W/kg; SAR(10 g) = 0.243 W/kg**

Maximum value of SAR (measured) = 0.452 W/kg



**Plot 4#: PCS 1900 Mid\_Body Back****DUT: Phone; Type: NEO 8; Serial: 2Y6U-1**

Communication System: UID 0, Generic GPRS-2 slots (0); Frequency: 1880 MHz; Duty Cycle: 1:4

Medium parameters used:  $f = 1880$  MHz;  $\sigma = 1.382$  S/m;  $\epsilon_r = 40.546$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7329; ConvF(7.37, 8.32, 7.54) @ 1880 MHz; Calibrated: 2024/3/27
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1354; Calibrated: 2024/12/3
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

**Area Scan (7x12x1):** Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.711 W/kg

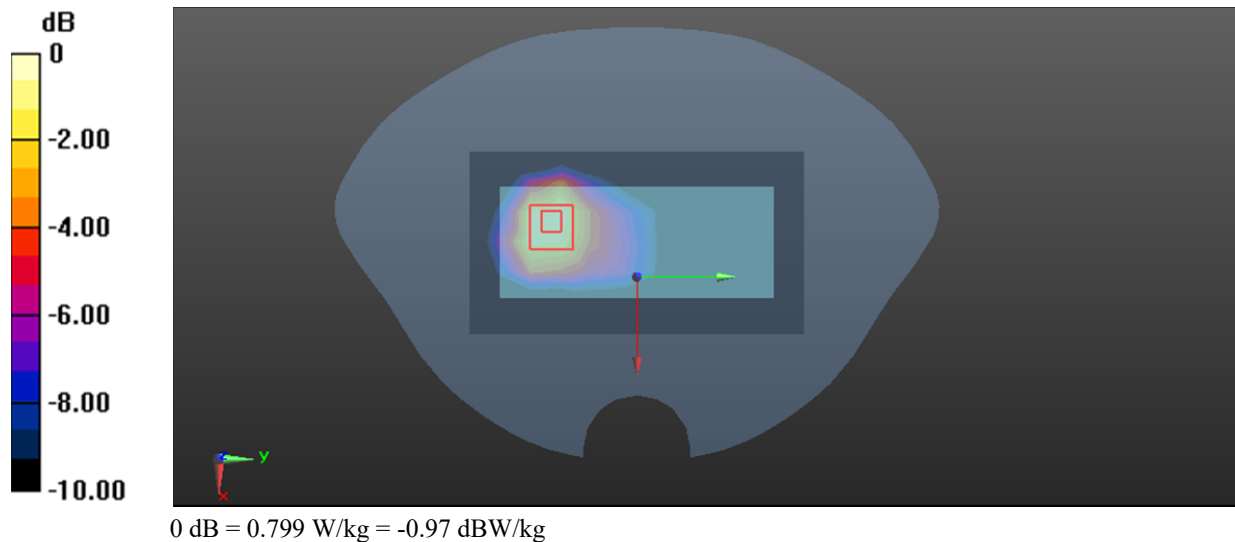
**Zoom Scan (5x5x7)/Cube 0:** Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 11.42 V/m; Power Drift = -0.20 dB

Peak SAR (extrapolated) = 0.960 W/kg

**SAR(1 g) = 0.551 W/kg; SAR(10 g) = 0.327 W/kg**

Maximum value of SAR (measured) = 0.799 W/kg



## APPENDIX A MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

### Measurement uncertainty evaluation for IEEE1528-2013 SAR test

Source of uncertainty	Tolerance/uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
<b>Measurement system</b>							
Probe calibration	6.55	N	1	1	1	6.3	6.3
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions – reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
<b>Test sample related</b>							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	3.8	N	1	1	1	3.8	3.8
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
<b>Phantom and set-up</b>							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Liquid conductivity target)	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2
Liquid conductivity meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity target)	5.0	R	$\sqrt{3}$	0.6	0.49	1.7	1.4
Liquid permittivity meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.1	23.7

## Measurement uncertainty evaluation for IEC62209-1 SAR test

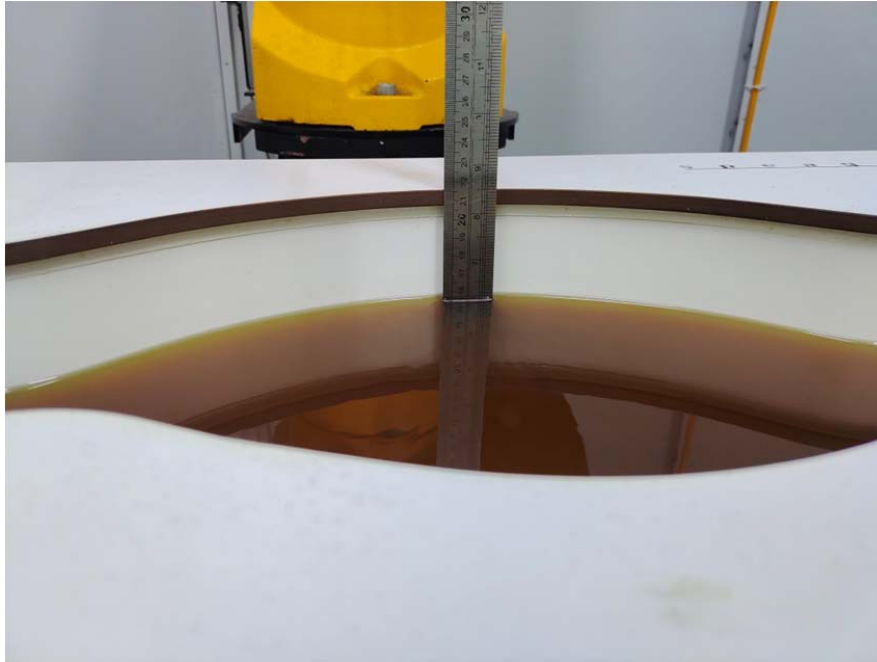
Source of uncertainty	Tolerance/ uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
<b>Measurement system</b>							
Probe calibration	6.55	N	1	1	1	6.3	6.3
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
RF ambient conditions– reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
<b>Test sample related</b>							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	3.8	N	1	1	1	3.8	3.8
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
<b>Phantom and set-up</b>							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Liquid conductivity target)	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2
Liquid conductivity meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity target)	5.0	R	$\sqrt{3}$	0.6	0.49	1.7	1.4
Liquid permittivity meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.0	23.6



## APPENDIX B EUT TEST POSITION PHOTOS

**Liquid depth  $\geq 15\text{cm}$**

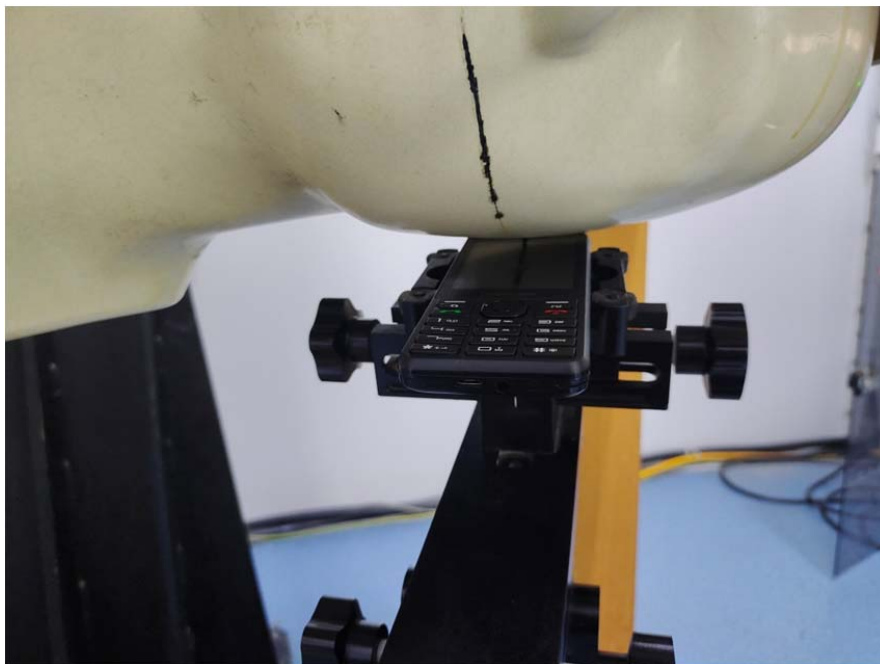
Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412



**Head Left Cheek Setup Photo(0mm)**



**Head Left Tilt Setup Photo (0mm)**



**Head Right Cheek Setup Photo(0mm)**



**Head Right Tilt Setup Photo (0mm)**



**Body(Worn) Front Setup Photo(5mm)**



**Body(Worn) Back Setup Photo(5mm)**



**BodyBottom Setup Photo(5mm)**



## **APPENDIX C CALIBRATION CERTIFICATES**

**Please Refer to the Attachment.**

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