# FCC SAR EVALUATION REPORT

# In accordance with the requirements of FCC 47 CFR Part 2(2.1093), ANSI/IEEE C95.1-1992 and IEEE Std 1528-2013

**Product Name:** Mobile Phone

Trademark: Bmobile

Model Name: C216

Family Model: N/A

Report No.: S21020300603001

FCC ID: ZSW-10-037

#### Prepared for

b mobile HK Limited

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#### **TEST RESULT CERTIFICATION**

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Manufacturer's Name ...... b mobile HK Limited

Flat 18; 14/F Block 1; Golden Industrial Building;16-26 Kwai Tak

Report No.: S21020300603001

Street; Kwai Chung; New Territories; Hong Kong

**Product description** 

Product name .....: Mobile Phone

Trademark .....: Bmobile

Model Name .....: C216

Family Model.....: N/A

FCC 47 CFR Part 2(2.1093)

Standards : : : ANSI/IEEE C95.1-1992

Published RF exposure KDB procedures

This device described above has been tested by Shenzhen NTEK. In accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 and KDB 865664 D01. Testing has shown that this device is capable of compliance with localized specific absorption rate (SAR) specified in FCC 47 CFR Part 2(2.1093) and ANSI/IEEE C95.1-1992. The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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#### **Date of Test**

Date (s) of performance of tests...........: Feb. 23, 2021 ~ Feb. 24, 2021

Date of Issue ...... Feb. 25, 2021

Test Result ..... Pass

Prepared By (Test Engineer)

(Cheng Jiawen)

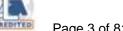
Approved By (Lab Manager)





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REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	Feb. 25, 2021	Cheng Jiawen





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#### 1. General Information

#### 1.1. RF exposure limits

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

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

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

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
80.0	1.6	4.0

NOTE: Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

#### **Occupational/Controlled Environments:**

Are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure, (i.e. as a result of employment or occupation).

#### **General Population/Uncontrolled Environments:**

Are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

NOTE
HEAD AND TRUNK LIMIT
1.6 W/kg
APPLIED TO THIS EUT



#### 1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for C216 are as follows.

RF Exposure Conditions		Equipment Class -Highest Reported SAR (W/kg)				
		PCE	DTS	NII	DSS	
1-g Head		0.033	N/A	N/A	N/A	
1-g Body-Worn		0.115	N/A	N/A	N/A	
(Separation distance of 10mm)		0.113	IN/A	IN/A	IN/A	
	Head	0.269	N/A	N/A	0.269	
Max Simultaneous Tx	Body-Worn	0.233	N/A	N/A	0.233	

Note: The Max Simultaneous Tx is calculated based on the same configuration and test position. This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2(2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 & KDB 865664 D01.

#### 1.3. EUT Description

Device Information						
Product Name	Mobile Phone					
Trade Name	Bmobile					
Model Name	C216					
Family Model	N/A					
FCC ID	ZSW-10-037					
Device Phase	Identical Prototype					
Exposure Category	General population / Unco	ntrolled environme	nt			
Antenna	GSM: PIFA Antenna; BT:	Monopole Antenna				
Battery Information	DC 3.7V, 600mAh					
Device Operating Configurations						
Supporting Mode(s)	GSM 850/1900, Bluetooth					
Test Modulation	GSM(GMSK), Bluetooth(GFSK, π/4-DQPSK, 8DPSK)					
Device Class	В					
	Band	Tx (MHz)	Rx (MHz)			
Operating Frequency Range(s)	GSM 850	824-849	869-894			
Operating Frequency (Varige(3)	GSM 1900	1850-1910	1930-1990			
	Bluetooth	2402	-2480			
	Max Number of Timeslots	in Uplink	4			
GPRS Multislot Class(12)	Max Number of Timeslots	in Downlink	4			
	Max Total Timeslot		5			
Power Class	Power Class 4, tested with power level 5(GSM 850)					



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1, tested with power level 0(GSM 1900)

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# 1.4. Test specification(s)

FCC 47 CFR Part 2(2.1093)
ANSI/IEEE C95.1-1992
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz
KDB 865664 D02 RF Exposure Reporting
KDB 447498 D01 General RF Exposure Guidance
KDB 941225 D01 3G SAR Procedures
KDB 648474 D04 Handset SAR

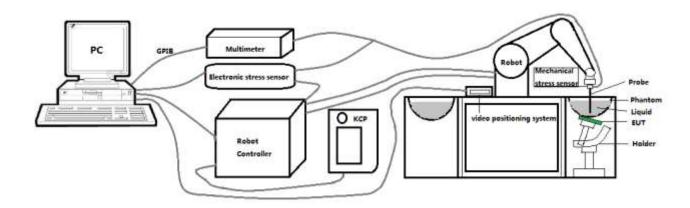
#### 1.5. Ambient Condition

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



### 2. SAR Measurement System

#### 2.1. SATIMO SAR Measurement Set-up Diagram



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

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

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





2.2. Robot

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



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

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#### 2.3. E-Field Probe

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

For the measurements the Specific Dosimetric E-Field Probe SN 41/18 EPGO330 with following specifications is used



- Dynamic range: 0.01-100 W/kg

- Tip Diameter: 2.5 mm

- Distance between probe tip and sensor center: 1 mm

- Distance between sensor center and the inner phantom surface: 2 mm (repeatability better than ±1 mm).

Probe linearity: ±0.10 dBAxial isotropy: 0.06 dB

- Hemispherical Isotropy: 0.09 dB

- Calibration range: 650MHz to 5900MHz for head & body simulating liquid.

- Lower detection limit: 9mW/kg

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

#### 2.3.1. E-Field Probe Calibration

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



# 2.4. SAM phantoms

# Photo of SAM phantom SN 16/15 SAM119

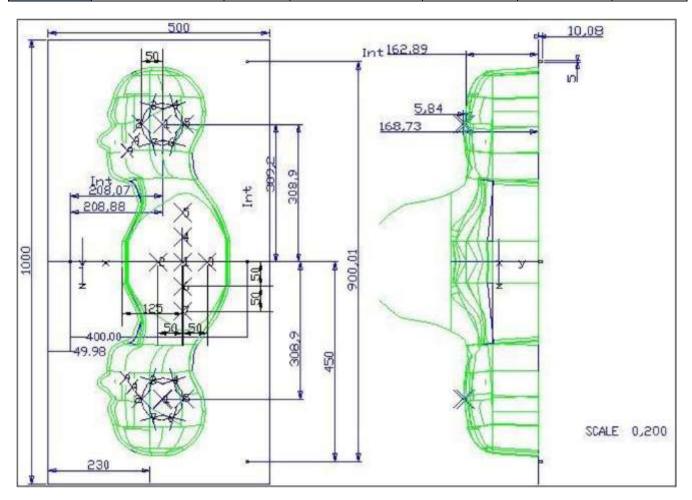


The SAM phantom is used to measure the SAR relative to people exposed to electro-magnetic field radiated by Mobile Phones.



#### 2.4.1. **Technical Data**

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



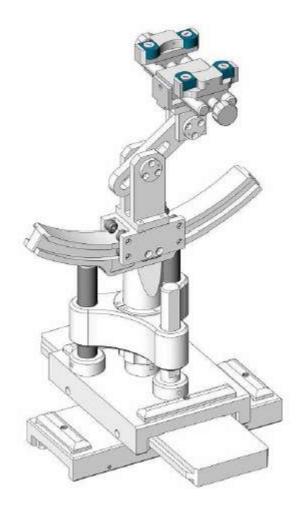
Serial Number	Left Head(mm)		Right Head(mm)		Flat Part(mm)	
	2	2.02	2	2.08	1	2.09
	3	2.05	3	2.06	2	2.06
	4	2.07	4	2.07	3	2.08
	5	2.08	5	2.08	4	2.10
SN 16/15 SAM119	6	2.05	6	2.07	5	2.10
	7	2.05	7	2.05	6	2.07
	8	2.07	8	2.06	7	2.07
	9	2.08	9	2.06	-	-

The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10  $\mu m$ .



# 2.5. Device Holder

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



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





## 2.6. Test Equipment List

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

Devices used during the test described are marked  $\boxtimes$ 

IV	/lanufacturer		Type/Model	Serial Number	Calibration		
		Equipment	i ype/iviodei	Seriai Number	Last Cal.	Due Date	
	MVG	E FIELD PROBE	SSE2	SN 41/18 EPGO330	Sep. 21,	Sep. 20,	
	IVIVO	LTILLDTROBL	OOLZ	014 41/10 E1 00000	2020	2021	
	MVG	750 MHz Dipole	SID750	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	101 0	700 Will 2 Dipole	012700	0G750-355	2018	2021	
	MVG	835 MHz Dipole	SID835	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	0		<b>0.2000</b>	0G835-347	2018	2021	
	MVG	900 MHz Dipole	SID900	SN 03/15 DIP	Apr. 19,	Apr. 18,	
		ooo iiii iz Dipolo	0.2000	0G900-348	2018	2021	
	MVG	1800 MHz Dipole	SID1800	SN 03/15 DIP	Apr. 19,	Apr. 18,	
		1000 WH 12 DIPOID	0.5.1000	1G800-349	2018	2021	
	MVG	1900 MHz Dipole	SID1900	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	101 0	1000 WII IZ DIPOIC	0101000	1G900-350	2018	2021	
	MVG	2000 MHz Dipole	SID2000	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	IVIVO	2000 WII IZ DIPOIC	0102000	2G000-351	2018	2021	
	MVG	2450 MHz Dipole	SID2450	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	IVIVO	2430 WII IZ DIPOIE	31D2430	2G450-352	2018	2021	
	MVG	2600 MHz Dipole	SID2600	SN 03/15 DIP	Apr. 19,	Apr. 18,	
	IVIVO	2000 WII IZ DIPOIC	0102000	2G600-356	2018	2021	
	MVG	5000 MHz Dipole	SWG5500	SN 13/14 WGA 33	Apr. 19,	Apr. 18,	
	IVIVO	3000 WII IZ DIPOIC	0110000	014 10/14 440/4 00	2018	2021	
	MVG	Liquid	SCLMP	ON 04/45 OODO 70	NCR	NCR	
	101 0	measurement Kit	OOLIVII	SN 21/15 OCPG 72	NOIX	NOIX	
$\boxtimes$	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR	
	KEITHLEY	Millivoltmeter	2000	4072790	NCR	NCR	
		Universal radio			lul 40	lul 40	
	R&S	communication	CMU200	117858	Jul. 13,	Jul. 12,	
		tester			2020	2021	
		Wideband radio			lul 40	lul 40	
	R&S	communication	CMW500	103917	Jul. 13,	Jul. 12,	
		tester			2020	2021	
	HP	Nationals Assistan	07505	0440 104400	Jul. 13,	Jul. 12,	
	1 11	Network Analyzer	8753D	3410J01136	2020	2021	
	Agilent	PSG Analog	E0057D	NN/54440440	Jul. 13,	Jul. 12,	
	Aglient	Signal Generator	E8257D	MY51110112	2020	2021	



$\boxtimes$	Agilent	Power meter	E4419B	MY45102538	Jul. 13, 2020	Jul. 12, 2021
$\boxtimes$	Agilent	Power sensor	E9301A	MY41495644	Jul. 13, 2020	Jul. 12, 2021
$\boxtimes$	Agilent	Power sensor	E9301A	US39212148	Jul. 13, 2020	Jul. 12, 2021
$\boxtimes$	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Jul. 17, 2020	Jul. 16, 2023



#### 3. SAR Measurement Procedures

The measurement procedures are as follows:

#### <Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/Bluetooth power measurement, use engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power in each supported wireless interface and frequency band.
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/Bluetooth output power.

#### <SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix A demonstrates.
- (c) Set scan area, grid size and other setting on the OPENSAR software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band.
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

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

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

#### 3.1. Power Reference

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

#### 3.2. Area scan & Zoom scan

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



Measurement of the SAR distribution with a grid of 8 to 16 mm \* 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme. Around this point, a cube of 30 \* 30 \*30 mm or 32 \* 32 \* 32 mm is assessed by measuring 5 or 8 \* 5 or 8 \* 4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

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

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

			≤ 3 GHz	> 3 GHz
Maximum distance fro (geometric center of pr			5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle surface normal at the n			30° ± 1°	20° ± 1°
			$\leq$ 2 GHz: $\leq$ 15 mm 2 – 3 GHz: $\leq$ 12 mm	$3 - 4 \text{ GHz: } \le 12 \text{ mm}$ $4 - 6 \text{ GHz: } \le 10 \text{ mm}$
Maximum area scan sp	atial resolu	ntion: $\Delta x_{Area}$ , $\Delta y_{Area}$	When the x or y dimension o measurement plane orientation the measurement resolution x or y dimension of the test dimeasurement point on the test	on, is smaller than the above, must be $\leq$ the corresponding evice with at least one
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$			$\leq$ 2 GHz: $\leq$ 8 mm 2 – 3 GHz: $\leq$ 5 mm <sup>*</sup>	$3 - 4 \text{ GHz: } \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \le 4 \text{ mm}^*$
	uniform	grid: Δz <sub>Zoom</sub> (n)	≤ 5 mm	$3 - 4 \text{ GHz}: \le 4 \text{ mm}$ $4 - 5 \text{ GHz}: \le 3 \text{ mm}$ $5 - 6 \text{ GHz}: \le 2 \text{ mm}$
Maximum zoom scan spatial resolution, normal to phantom surface	graded	Δz <sub>Zoom</sub> (1): between 1 <sup>st</sup> two points closest to phantom surface	≤ 4 mm	$3 - 4 \text{ GHz: } \le 3 \text{ mm}$ $4 - 5 \text{ GHz: } \le 2.5 \text{ mm}$ $5 - 6 \text{ GHz: } \le 2 \text{ mm}$
	grid	Δz <sub>Zoom</sub> (n>1): between subsequent points	≤ 1.5·Δz	Zoom(n-1)
Minimum zoom scan volume	x, y, z		≥ 30 mm	$3 - 4 \text{ GHz: } \ge 28 \text{ mm}$ $4 - 5 \text{ GHz: } \ge 25 \text{ mm}$ $5 - 6 \text{ GHz: } \ge 22 \text{ mm}$

Note:  $\delta$  is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

<sup>\*</sup> When zoom scan is required and the <u>reported</u> SAR from the <u>area scan based 1-g SAR estimation</u> procedures of KDB 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.



#### 3.3. Description of interpolation/extrapolation scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimise measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1 mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

#### 3.4. Volumetric Scan

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

#### 3.5. Power Drift

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



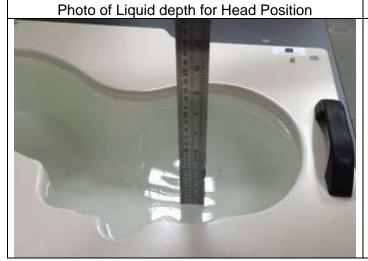
# 4. System Verification Procedure

#### 4.1. Tissue Verification

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

Ingredients (% of weight)		Head Tissue								
Frequency Band (MHz)	750	835	900	1800	1900	2000	2450	2600	5200	5800
Water	34.40	34.40	34.40	55.36	55.36	57.87	57.87	57.87	65.53	65.53
NaCl	0.79	0.79	0.79	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	64.81	64.81	64.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23

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





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#### 4.1.1. Tissue Dielectric Parameter Check Results

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

		•	' <del>-</del>					
	Measured	Target T	Measure	d Tissue				
Tissue Type	Frequency (MHz)	εr (±5%)	σ (S/m) (±5%)	εr	σ (S/m)	Liquid Temp.	Test Date	
Head	925	41.50	0.90	42.18	0.00	21.5 °C	Fab 22 2024	
850	835	(39.43~43.58)	(0.86~0.95)	42.10	0.89	21.5 C	Feb. 23, 2021	
Head	1900	40.00	1.40	39.72	1.39	21.5 °C	Fob 24 2021	
1900	1900	(38.00~42.00)	(1.33~1.47)	39.72	1.39	21.5 C	Feb. 24, 2021	

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

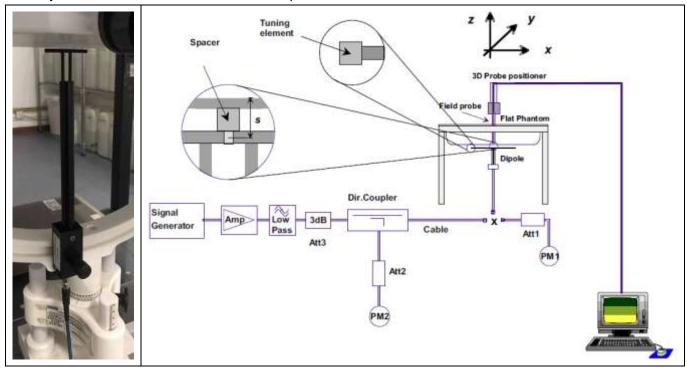




#### 4.2. System Verification Procedure

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

The system verification is shown as below picture:





4.2.1. System Verification Results

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

	Target SA	• •	Measure			
System	(±10	1%)	(Normalize	ed to 1VV)	Liquid	T( D-(-
Verification	1-g (W/Kg)	10-g (W/Kg)	1-g	10-g	Temp.	Test Date
	1-g (vv/kg)	10-g (vv/kg)	(W/Kg)	(W/Kg)		
835MHz	9.55 (8.60~10.51)	6.10 (5.49~6.71)	9.61	5.86	21.5 °C	Feb. 23, 2021
1900MHz	38.92 (35.03~42.81)	20.09 (18.08~22.10)	39.87	20.77	21.5 °C	Feb. 24, 2021



## 5. SAR Measurement variability and uncertainty

#### 5.1. SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

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

#### 5.2. SAR measurement uncertainty

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

## 6. RF Exposure Positions

#### 6.1. Ear and handset reference point

Figure 6.1.1 shows the front, back, and side views of the SAM phantom. The center-of-mouth reference point is labeled "M", the left ear reference point (ERP) is marked "LE", and the right ERP is marked "RE".



Fig 6.1.1 Front, back, and side views of SAM phantom

#### 6.2. Definition of the cheek position

- 1. Define two imaginary lines on the handset, the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width w<sub>t</sub> of the handset at the level of the acoustic output (point A in Figure 6.2.1 and Figure 6.2.2), and the midpoint of the width w<sub>b</sub> of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Figure 6.2.1). The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset (see Figure 6.2.2), especially for clamshell handsets, handsets with flip covers, and other irregularly-shaped handsets.
- 2. Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 6.2.3), such that the plane defined by the vertical centerline and the horizontal line of the handset is approximately parallel to the sagittal plane of the phantom.
- 3. Translate the handset towards the phantom along the line passing through RE and LE until handset point A touches the pinna at the ERP
- 4. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to the plane containing B-M and N-F lines, i.e., the Reference Plane.
- 5. Rotate the handset around the vertical centerline until the handset (horizontal line) is parallel to the N-F line.

6. While maintaining the vertical centerline in the Reference Plane, keeping point A on the line passing through RE and LE, and maintaining the handset contact with the pinna, rotate the handset about the N-F line until any point on the handset is in contact with a phantom point below the pinna on the cheek. See Figure 6.2.3. The actual rotation angles should be documented in the test report.

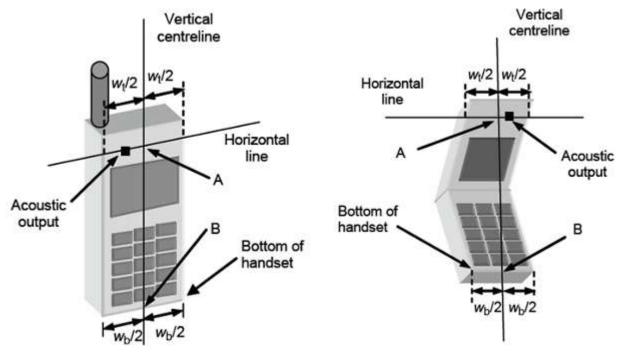


Fig 6.2.1 Handset vertical and horizontal reference lines—"fixed case

Fig 6.2.2 Handset vertical and horizontal reference lines—"clam-shell case"

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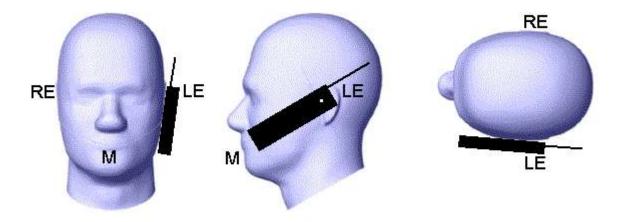


Fig 6.2.3 cheek or touch position. The reference points for the right ear (RE), left ear (LE), and mouth (M), which establish the Reference Plane for handset positioning, are indicated.



#### 6.3. Definition of the tilt position

- 1. While maintaining the orientation of the handset, retract the handset parallel to the reference plane far enough away from the phantom to enable a rotation of the device by 15 degree.
- 2. Rotate the Handset around the horizontal line by 15 degree (see Figure 6.3.1).
- 3. While maintaining the orientation of the handset, move the handset towards the phantom on a line passing through RE and LE until any part of the handset touches the ear. The tilt position is obtained when the contact is on the pinna. If the contact is at any location other than the pinna, e.g., the antenna with the back of the phantom head, the angle of the handset shall be reduced. In this case, the tilt position is obtained if any part of the handset is in contact with the pinna as well as a second part of the handset is in contact with the phantom, e.g., the antenna with the back of the head.



Figure 6.3.1 – Tilt position of the wireless device on the left side of SAM

#### 6.4. Body Worn Accessory

- 1. Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 6.4.1). Per KDB 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 447498 D01 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 body-worn accessory, measured without a headset connected to the handset is < 1.2 W/kg, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a handset attached to the handset.</p>
- 2. 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 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 test with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-chip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

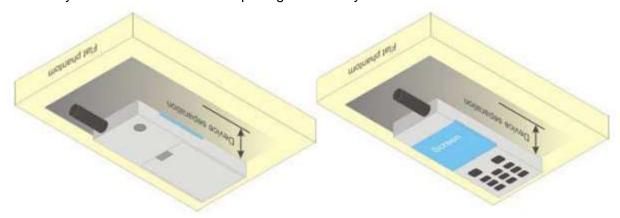


Figure 6.4.1 – Test positions for body-worn devices

# 7. RF Output Power

#### 7.1. GSM Conducted Power

Band GSM850	Burst-Av	eraged ou	tput Powe	r (dBm)	Frame-Averaged output Power (dBm)			
Tx Channel	Tune-up	128	189	251	Tune-up	128	189	251
Frequency (MHz)	(dBm)	824.2	836.4	848.8	(dBm)	824.2	836.4	848.8
GSM (GMSK)	33.50	33.42	33.23	33.17	24.47	24.39	24.20	24.14
Band GSM1900	Burst-Av	eraged ou	tput Powe	r (dBm)	Frame-Averaged output Power (dBm)			
Tx Channel	Tune-up	512	661	810	Tune-up	512	661	810
Frequency (MHz)	(dBm)	1850.2	1880.0	1909.8	(dBm)	1850.2	1880.0	1909.8
GSM (GMSK)	31.50	30.08	30.80	31.33	22.47	21.05	21.77	22.30

Note: The frame-averaged power is linearly scaled the maximum burst averaged power over 8 time slots. The calculated method are shown as below:

Frame-averaged power = Maximum burst averaged power (1 TS) - 9.03 dB

#### 7.2. Bluetooth Output Power

#### 7.2.1. **Output Power Results Of Bluetooth**

	Output Power (dBm)								
	D . D .	+	Channel						
	Data Rates	Tune-up	0CH	39CH	78CH				
BR+EDR	1M	7.50	5.52	7.11	6.80				
	2M	7.50	6.61	6.21	6.34				
	3M	7.50	6.04	7.04	7.05				

#### 8. Stand-alone SAR test exclusion

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

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

- f<sub>(GHZ)</sub> is the RF channel transmit frequency in GHz
- · Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

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

Mode	P <sub>max</sub>	P <sub>max</sub>	Distance	f	Calculation	SAR Exclusion	SAR test
ivioue	(dBm)	(mW)	(mm)	(GHz)	Result	threshold	exclusion
Bluetooth	7.50	5.62	5	2.480	1.77	3.0	Yes

NOTE: Standalone SAR test exclusion for Bluetooth

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

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

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

Mode	Position	P <sub>max</sub> (dBm)	P <sub>max</sub> (mW)	Distance (mm)	f (GHz)	х	Estimated SAR (W/Kg)
Bluetooth	Head	7.50	5.62	5	2.480	7.5	0.236
Bluetooth	Body	7.50	5.62	10	2.480	7.5	0.118

NOTE: Estimated SAR calculation for Bluetooth



## 9. SAR Results

#### 9.1. SAR measurement results

#### 9.1.1. SAR measurement Result of GSM850

Test	Position channel		SAR Value (W/kg)		Power Drift	Conducted	Tune-up	Scaled SAR	Date
of Head	/Freq.	Mode	1g	10g	(±5%)	(dBm)	(dBm)	1g (W/Kg)	Bato
Left Cheek	189/836.4	GSM Voice	0.031	0.026	3.37	33.23	33.50	0.033	2021/2/23
Left Tilt 15 Degree	189/836.4	GSM Voice	0.017	0.015	-2.50	33.23	33.50	0.018	2021/2/23
Right Cheek	189/836.4	GSM Voice	0.029	0.028	3.71	33.23	33.50	0.031	2021/2/23
Right Tilt 15 Degree	189/836.4	GSM Voice	0.014	0.013	-4.99	33.23	33.50	0.015	2021/2/23

NOTE: Head SAR test results of GSM850.

Test Position of	Test channel	Test		Value ⁄kg)	Power Drift	Conducted	Tune-up	Scaled SAR	Date
Body-Worn with 10mm	/Freq.	Mode	1g	10g	(±5%)	(dBm)	(dBm)	1g (W/Kg)	Date
Front Side	189/836.4	GSM Voice	0.026	0.017	-1.19	33.23	33.50	0.028	2021/2/23
Back Side	189/836.4	GSM Voice	0.033	0.025	0.05	33.23	33.50	0.035	2021/2/23

NOTE: Body-Worn SAR test results of GSM850

#### 9.1.2. SAR measurement Result of GSM1900

Test Position of Head	Test channel /Freq.	Test Mode		Value ′kg) 10g	Power Drift (±5%)	Conducted power (dBm)	Tune-up power (dBm)	Scaled SAR 1g (W/Kg)	Date
Left Cheek	661/1880	GSM Voice	0.023	0.020	0.13	30.80	31.50	0.027	2021/2/24
Left Tilt 15 Degree	661/1880	GSM Voice	0.015	0.014	-2.69	30.80	31.50	0.018	2021/2/24
Right Cheek	661/1880	GSM Voice	0.021	0.019	-2.43	30.80	31.50	0.025	2021/2/24
Right Tilt 15 Degree	661/1880	GSM Voice	0.013	0.012	0.62	30.80	31.50	0.015	2021/2/24

NOTE: Head SAR test results of GSM1900

Test Position of	Test	Test		Value ′kg)	Power Drift	Conducted	Tune-up	Scaled SAR	Date
Body-Worn with 10mm	channel /Freq.	Mode	1g	10g	(±5%)	(dBm)	power (dBm)	1g (W/Kg)	Dale



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Front Side	661/1880	GSM Voice	0.075	0.058	1.42	30.80	31.50	0.088	2021/2/24
Back Side	661/1880	GSM Voice	0.098	0.072	3.97	30.80	31.50	0.115	2021/2/24

NOTE: Body-Worn SAR test results of GSM1900

#### 9.2. SAR Summation Scenario

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

- 1) Scalar SAR summation < 1.6W/kg.
- 2) SPLSR =  $(SAR_1 + SAR_2)^{1.5}$ / (min. separation distance, mm), and the peak separation distance is determined from the square root of  $[(x_1-x_2)^2 + (y_1-y_2)^2 + (z_1-z_2)^2]$ , where  $(x_1, y_1, z_1)$  and  $(x_2, y_2, z_2)$  are the coordinates of the extrapolated peak SAR locations in the zoom scan. If SPLSR  $\leq$  0.04, simultaneously transmission SAR measurement is not necessary.

Test Position		Scaled	Scaled SAR <sub>MAX</sub>		0DI 0D	
		WWAN	Bluetooth	(W/Kg)	SPLSR	Remark
	Left Cheek	0.033	0.236	0.269	N/A	N/A
	Left Tilt 15 Degree	0.018	0.236	0.254	N/A	N/A
Head	Right Cheek	0.031	0.236	0.267	N/A	N/A
	Right Tilt 15 Degree	0.015	0.236	0.251	N/A	N/A
D 1 14/	Front Side	0.088	0.118	0.206	N/A	N/A
Body-Worn	Back Side	0.115	0.118	0.233	N/A	N/A

# 10. Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR

# 11. Appendix B. System Check Plots

Table of contents
MEASUREMENT 1 System Performance Check - 835MHz
MEASUREMENT 2 System Performance Check - 1900MHz



# **MEASUREMENT 1**

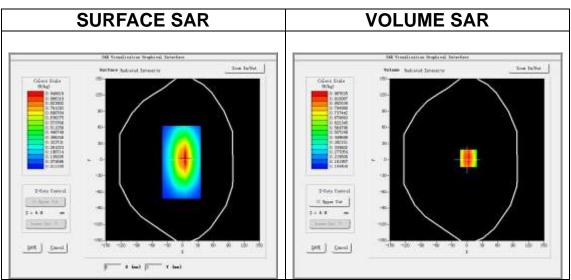
Date of measurement: 23/2/2021

A. Experimental conditions.

71: Experimental conditions	<u>*•</u>		
Area Scan	dx=15mm dy=15mm, h= 5.00 mm		
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm		
<u>Phantom</u>	<u>Validation plane</u>		
Device Position	Dipole		
<u>Band</u>	<u>CW835</u>		
Channels	<u>Middle</u>		
Signal	CW (Crest factor: 1.0)		

# **B. SAR Measurement Results**

835.000000
42.183541
19.280613
0.891742
2.190000

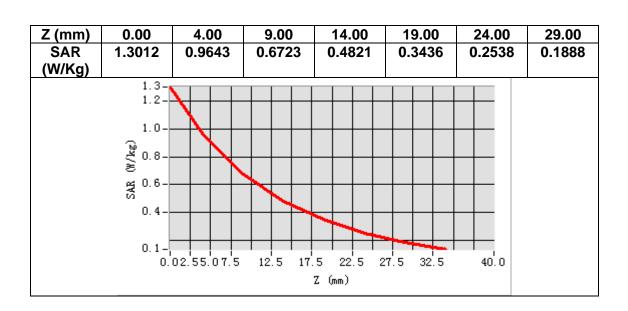


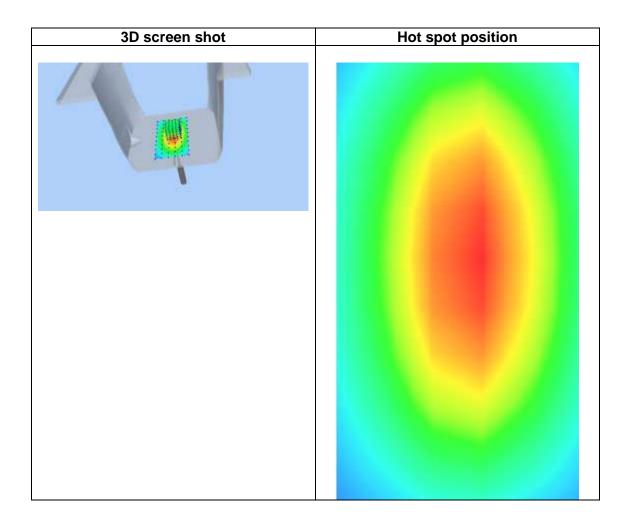
Maximum location: X=3.00, Y=3.00 SAR Peak: 1.30 W/kg

SAR 10g (W/Kg)	0.586266
SAR 1g (W/Kg)	0.961235













# **MEASUREMENT 2**

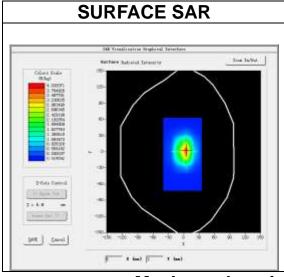
Date of measurement: 24/2/2021

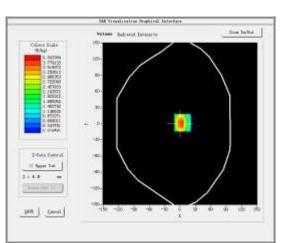
A. Experimental conditions.

dx=15mm dy=15mm, h= 5.00 mm
5x5x7,dx=8mm dy=8mm dz=5mm
Validation plane
<u>Dipole</u>
<u>CW1900</u>
<u>Middle</u>
CW (Crest factor: 1.0)

# **B. SAR Measurement Results**

Att modern om out troodite	
Frequency (MHz)	1900.000000
Relative permittivity (real part)	39.721287
Relative permittivity (imaginary part)	13.193008
Conductivity (S/m)	1.390336
Variation (%)	-1.450000

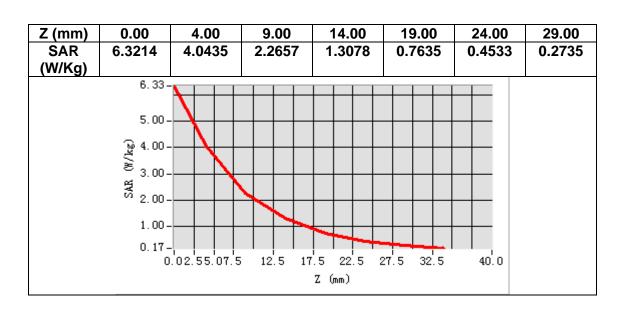


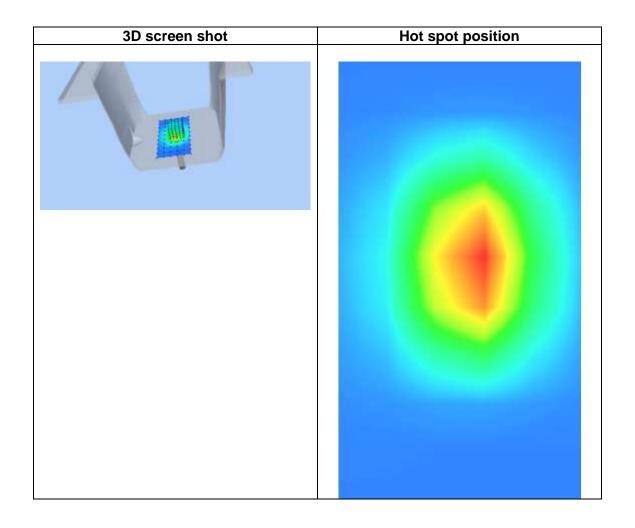


**VOLUME SAR** 

Maximum location: X=5.00, Y=2.00 SAR Peak: 6.70 W/kg

SAR 10g (W/Kg)	2.077456
SAR 1g (W/Kg)	3.987365







# 12. Appendix C. Plots of High SAR Measurement

Table of contents	
MEASUREMENT 1 GSM 850 Head	
MEASUREMENT 2 GSM 850 Body	
MEASUREMENT 3 GSM 1900 Head	
MEASUREMENT 4 GSM 1900 Body	



# **MEASUREMENT 1**

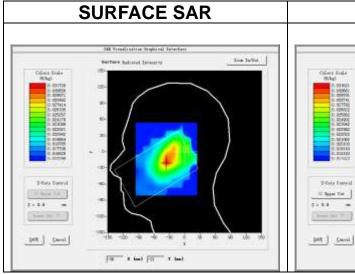
Date of measurement: 23/2/2021

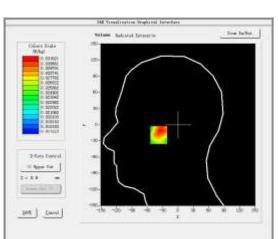
A. Experimental conditions.

7 tr =2tp-01111011ta1 0011a1ta01101	
Area Scan	dx=15mm dy=15mm, h= 5.00 mm
<u>ZoomScan</u>	5x5x7,dx=8mm dy=8mm dz=5mm
<u>Phantom</u>	<u>Left head</u>
<u>Device Position</u>	<u>Cheek</u>
<u>Band</u>	<u>GSM850</u>
Channels	<u>Middle</u>
Signal	TDMA (Crest factor: 8.0)

# **B. SAR Measurement Results**

tit modear omorit recarte	
Frequency (MHz)	836.400000
Relative permittivity (real part)	42.088448
Relative permittivity (imaginary part)	19.307841
Conductivity (S/m)	0.897171
Variation (%)	3.370000



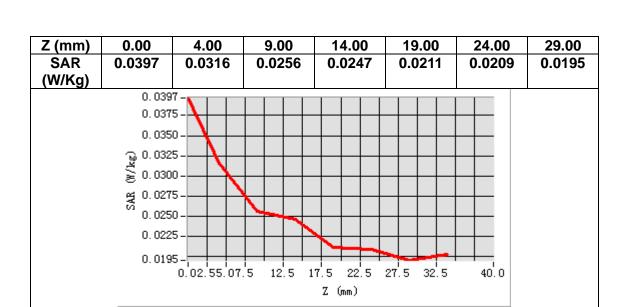


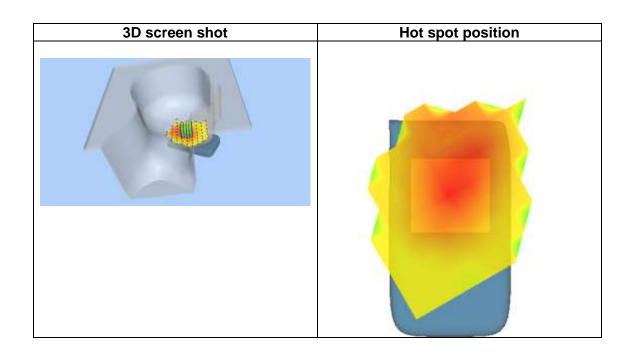
**VOLUME SAR** 

Maximum location: X=-35.00, Y=-19.00

SAR Peak: 0.04 W/kg

SAR 10g (W/Kg)	0.026224
SAR 1g (W/Kg)	0.031227







# **MEASUREMENT 2**

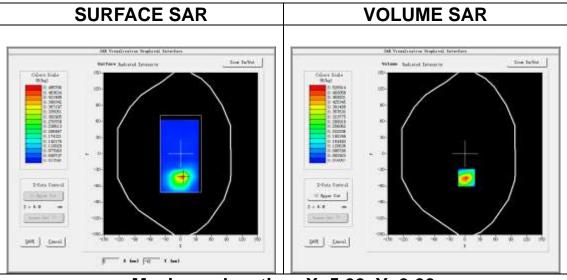
Date of measurement: 23/2/2021

A. Experimental conditions.

<u>Area Scan</u>	dx=15mm dy=15mm, h= 5.00 mm
<u>ZoomScan</u>	5x5x7,dx=8mm dy=8mm dz=5mm
<u>Phantom</u>	Validation plane
<b>Device Position</b>	<u>Body</u>
<u>Band</u>	<u>GSM850</u>
<u>Channels</u>	<u>Middle</u>
Signal	TDMA (Crest factor: 8.0)

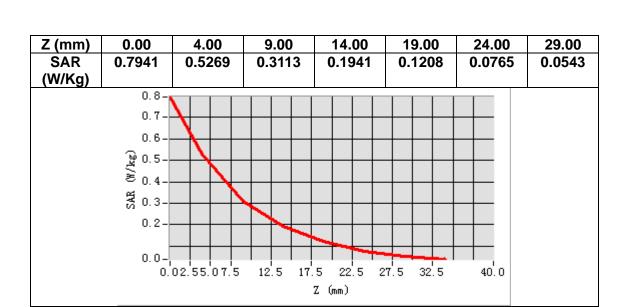
# **B. SAR Measurement Results**

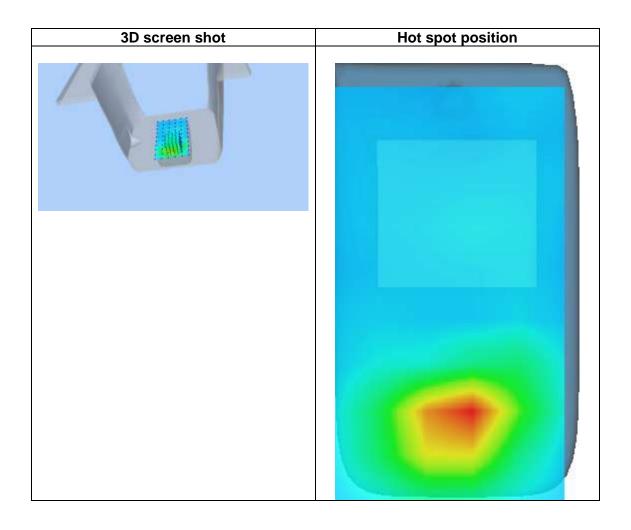
<u> </u>	
Frequency (MHz)	836.400000
Relative permittivity (real part)	42.088448
Relative permittivity (imaginary part)	19.307841
Conductivity (S/m)	0.897171
Variation (%)	0.050000



Maximum location: X=5.00, Y=3.00 SAR Peak: 0.06 W/kg

SAR 10g (W/Kg)	0.025265
SAR 1g (W/Kg)	0.032753







# **MEASUREMENT 3**

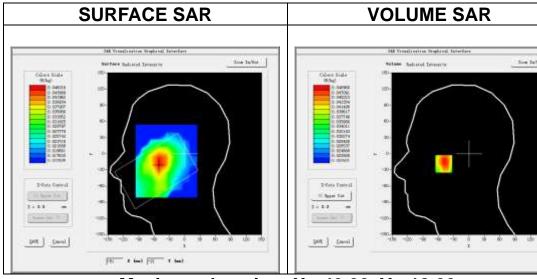
Date of measurement: 24/2/2021

A. Experimental conditions.

	<del></del>
Area Scan	dx=12mm dy=12mm, h= 5.00 mm
<u>ZoomScan</u>	7x7x7,dx=5mm dy=5mm dz=5mm
<u>Phantom</u>	<u>Left head</u>
<u>Device Position</u>	<u>Cheek</u>
<u>Band</u>	<u>GSM1900</u>
<u>Channels</u>	<u>Middle</u>
Signal	TDMA (Crest factor: 8.0)

# **B. SAR Measurement Results**

Wit modediomonic recoding	
Frequency (MHz)	1880.000000
Relative permittivity (real part)	40.090386
Relative permittivity (imaginary part)	12.835669
Conductivity (S/m)	1.340614
Variation (%)	0.130000



Maximum location: X=-49.00, Y=-18.00 SAR Peak: 0.04 W/kg

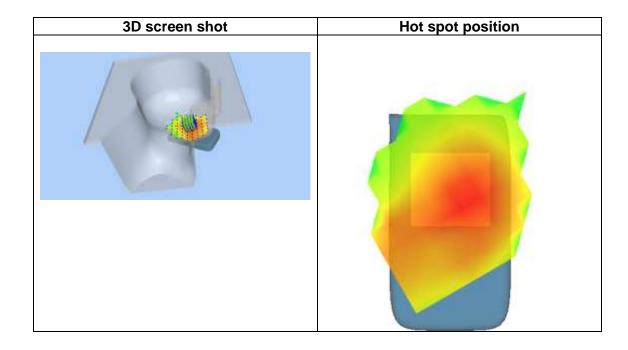
 SAR 10g (W/Kg)
 0.020350

 SAR 1g (W/Kg)
 0.023239





Z (mm) 0.00 4.00 9.00 14.00 19.00 24.00 29.00 SAR 0.0284 0.0249 0.0216 0.0198 0.0191 0.0183 0.0172 (W/Kg) 0.028 0.026 (a) 0.024 (b) 0.022 ₩ 0.020 0.018-0.016-40.0 0.02.55.07.5 12.5 17.5 22.5 27.5 Z (mm)





**MEASUREMENT 4** 

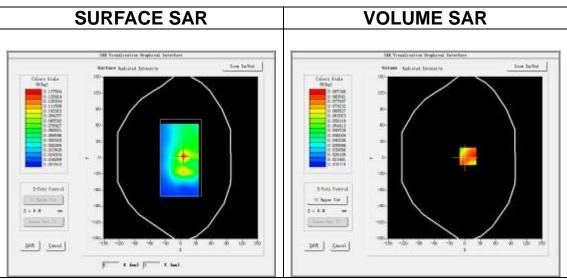
Date of measurement: 24/2/2021

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
<u>ZoomScan</u>	5x5x7,dx=8mm dy=8mm dz=5mm
<u>Phantom</u>	Validation plane
<b>Device Position</b>	<u>Body</u>
<u>Band</u>	<u>GSM1900</u>
Channels	<u>Middle</u>
<u>Signal</u>	TDMA (Crest factor: 8.0)

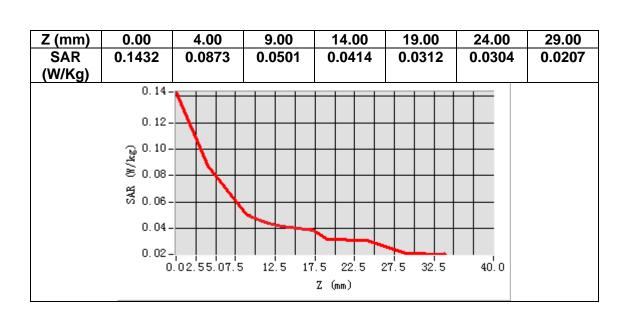
**B. SAR Measurement Results** 

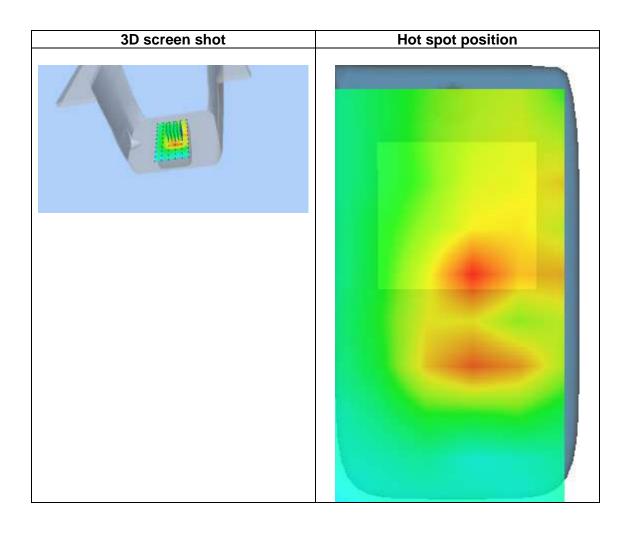
1880.00000	
40.090386	
12.835669	
1.340614	
3.970000	



Maximum location: X=6.00, Y=3.00 SAR Peak: 0.13 W/kg

SAR 10g (W/Kg)	0.072451
SAR 1g (W/Kg)	0.098172







13. Appendix D. Calibration Certificate

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E Field Probe - SN 41/18 EPGO330	
835 MHz Dipole - SN 03/15 DIP 0G835-347	
1900 MHz Dipole - SN 03/15 DIP 1G900-350	
Extended Calibration Certificate	





# COMOSAR E-Field Probe Calibration Report

Ref: ACR.142.6.20.SATU.B

Report No.: S21020300603001

SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.
BUILDING E, FENDA SCIENCE PARK, SANWEI
COMMUNITY, XIXIANG STREET,
BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: SN 41/18 EPGO330

Calibrated at MVG US 2105 Barrett Park Dr. - Kennesaw, GA 30144



Calibration Date: 09/21/20

# Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed in MVG USA using the CALISAR / CALIBAIR test bench, for use with a COMOSAR system only. All calibration results are traceable to national metrology institutions.



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Report No.: S21020300603001



## COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR 142.6.20.SATU.B

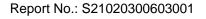
	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	9/22/2020	75
Checked by :	Jérôme LUC	Product Manager	9/22/2020	JS
Approved by :	Kim RUTKOWSKI	Quality Manager	9/22/2020	ALM PRETAMENTAL

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

Issue	Date	Modifications	
A	9/22/2020	Initial release	
В	9/27/2020	Change customer name and address	









Ref. ACR.142.6.20.SATU.B

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Ref. ACR.142.6.20.SATU.B

Report No.: S21020300603001

#### 1 DEVICE UNDER TEST

Device Under Test				
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE			
Manufacturer	MVG			
Model	SSE2			
Serial Number	SN 41/18 EPGO330			
Product Condition (new / used)	Used			
Frequency Range of Probe	0.15 GHz-6GHz			
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.186 MΩ			
500 1000 100 100 100 100 100 100 100 100	Dipole 2: R2=0.191 MΩ			
	Dipole 3: R3=0.201 MΩ			

A yearly calibration interval is recommended.

## 2 PRODUCT DESCRIPTION

# 2.1 GENERAL INFORMATION

MVG's COMOSAR E field Probes are built in accordance to the IEEE 1528, OET 65 Bulletin C and CEI/IEC 62209 standards.



Figure 1 - MVG COMOSAR Dosimetric E field Dipole

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

# 3 MEASUREMENT METHOD

The IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

# 3.1 LINEARITY

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

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Ref: ACR.142.6.20.SATU.B

#### 3.2 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards.

# 3.3 LOWER DETECTION LIMIT

The lower detection limit was assessed using the same measurement set up as used for the linearity measurement. The required lower detection limit is 10 mW/kg.

# 3.4 ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 - 360 degrees in 15 degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis  $(0^{\circ}-180^{\circ})$  in  $15^{\circ}$  increments. At each step the probe is rotated about its axis  $(0^{\circ}-360^{\circ})$ .

# 3.5 BOUNDARY EFFECT

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

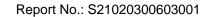
# 4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEEE 1528, OET 65 Bulletin C, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty associated with an E-field probe calibration using the waveguide technique. All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

ERROR SOURCES	Uncertainty value (%)	Probability Distribution	Divisor	ci	Standard Uncertainty (%)
Incident or forward power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Reflected power	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Liquid conductivity	5.00%	Rectangular	$\sqrt{3}$	1	2.887%
Liquid permittivity	4.00%	Rectangular	√3	1	2.309%
Field homogeneity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Field probe positioning	5.00%	Rectangular	$\sqrt{3}$	1	2.887%









Ref. ACR 142.6.20.SATU.B

Field probe linearity	3.00%	Rectangular	$\sqrt{3}$	1	1.732%
Combined standard uncertainty					5.831%
Expanded uncertainty 95 % confidence level k = 2					12.0%

# 5 CALIBRATION MEASUREMENT RESULTS

	Calibration Parameters	
Liquid Temperature	21 °C	
Lab Temperature	21 °C	
Lab Humidity	45 %	

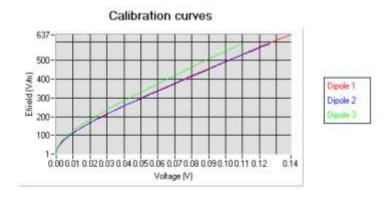
# 5.1 SENSITIVITY IN AIR

	Normy dipole 2 (μV/(V/m) <sup>2</sup> )	
0.92	0.79	0.63

DCP dipole 1	DCP dipole 2	DCP dipole 3
(mV)	(mV)	(mV)
90	97	92

Calibration curves ei=f(V) (i=1,2,3) allow to obtain H-field value using the formula:

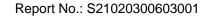
$$E = \sqrt{E_1^2 + E_2^2 + E_3^2}$$



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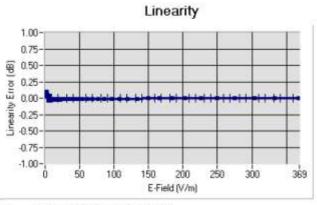






Ref. ACR 142.6.20.SATU.B

# 5.2 LINEARITY



Linearity: I+/-2.36% (+/-0.10dB)

# 5.3 SENSITIVITY IN LIQUID

Liquid	Frequency (MHz +/- 100MHz)	Permittivity	Epsilon (S/m)	ConvF
HL750	750	40.76	0.93	1.54
BL750	750	56.70	0.98	1.59
HL850	835	40.86	0.92	1.60
BL850	835	56.35	0.99	1.64
HL900	900	42.84	0.95	1.61
BL900	900	53,25	1.05	1.65
HL1800	1800	39.56	1.40	1.74
BL1800	1800	52.84	1.45	1.81
HL1900	1900	39.67	1.38	2.03
BL1900	1900	52.84	1.59	2.08
HL2000	2000	38.71	1.42	1.86
BL2000	2000	52.03	1.52	1.92
HL2450	2450	38.72	1.80	2.05
BL2450	2450	54.91	1.97	2.12
HL2600	2600	39.98	1.89	2.06
BL2600	2600	54.42	2.18	2.11
HL5200	5200	36.68	4.45	1.85
BL5200	5200	49.02	5.46	1.92
HL5400	5400	36.08	4.69	1.75
BL5400	5400	49.55	5.53	1.83
HL5600	5600	35.34	4.95	1.88
BL5600	5600	47.60	5.77	1.95
HL5800	5800	34.81	5.08	1.89
BL5800	5800	47.81	6.12	1.94

LOWER DETECTION LIMIT: 9mW/kg



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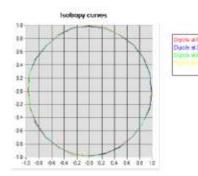
## COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR.142.6.20.SATU.B

# 5.4 ISOTROPY

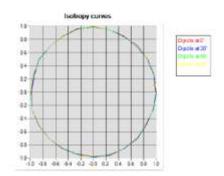
# HL900 MHz

- Axial isotropy: 0.05 dB - Hemispherical isotropy: 0.07 dB



# HL1800 MHz

- Axial isotropy: 0.06 dB - Hemispherical isotropy: 0.07 dB





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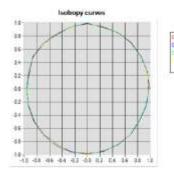


## COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR.142.6.20.SATU.B

# HL5600 MHz

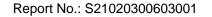
- Axial isotropy: 0.06 dB - Hemispherical isotropy: 0.09 dB













Ref. ACR 142.6.20.SATU.B

# 6 LIST OF EQUIPMENT

Equipment Summary Sheet					
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date	
Flat Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.	
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No ca required.	
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2019	02/2022	
Reference Probe	MVG	EP 94 SN 37/08	10/2019	10/2020	
Multimeter	Keithley 2000	1188656	01/2020	01/2023	
Signal Generator	Agilent E4438C	MY49070581	01/2020	01/2023	
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.	
Power Meter	HP E4418A	US38261498	01/2020	01/2023	
Power Sensor	HP ECP-E26A	US37181460	01/2020	01/2023	
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.	
Waveguide	Mega Industries	069Y7-158-13-712	Validated. No cal required.	Validated. No cal required.	
Waveguide Transition	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.	
Waveguide Termination	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.	
Temperature / Humidity Sensor	Control Company	150798832	11/2020	11/2023	







# **SAR Reference Dipole Calibration Report**

Ref: ACR.109.2.18.SATU.A

# SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET, BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA MVG COMOSAR REFERENCE DIPOLE

> FREQUENCY: 835 MHZ SERIAL NO.: SN 03/15 DIP 0G835-347

Calibrated at MVG US 2105 Barrett Park Dr. - Kennesaw, GA 30144





Calibration Date: 04/19/2018

## Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG USA using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.



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## SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.109.2.18.SATU.A

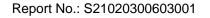
	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	4/19/2018	25
Checked by :	Jérôme LUC	Product Manager	4/19/2018	JES
Approved by :	Kim RUTKOWSKI	Quality Manager	4/19/2018	ALM Puthocoshi

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

Issue	Date	Modifications	
A	4/19/2018	Initial release	







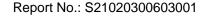


Ref: ACR.109.2.18.SATU.A

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Ref: ACR.109.2.18.SATU.A.

## 1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, FCC KDBs and CEL/IEC 62209 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

## 2 DEVICE UNDER TEST

Device Under Test			
Device Type	COMOSAR 835 MHz REFERENCE DIPOLE		
Manufacturer	MVG		
Model	SID835		
Serial Number	SN 03/15 DIP 0G835-347		
Product Condition (new / used) Used			

A yearly calibration interval is recommended.

# 3 PRODUCT DESCRIPTION

# 3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEEE 1528, FCC KDBs and CEI/IEC 62209 standards. The product is designed for use with the COMOSAR test bench only.



Figure 1 - MVG COMOSAR Validation Dipole

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## 4 MEASUREMENT METHOD

The IEEE 1528, FCC KDBs and CEI/IEC 62209 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

# 4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards.

## 4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimensions frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness.

## 5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

# 5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss	
400-6000MHz	0.1 dB	

# 5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length
3 - 300	0.05 mm

# 5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty
1 g	20.3 %

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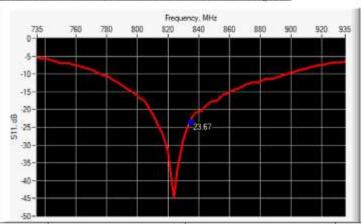
#### SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref. ACR.109.2.18.SATU.A.

10 g	20.1 %

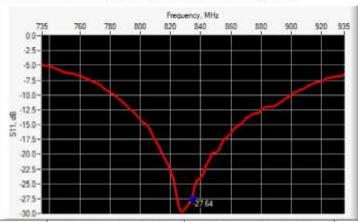
# 6 CALIBRATION MEASUREMENT RESULTS

# 6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
835	-23.67	-20	56.8 Ω - 1.5 jΩ

# 6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
835	-27.64	-20	$53.5 \Omega + 2.3 i\Omega$

# 6.3 MECHANICAL DIMENSIONS

Frequency MHz	Ln	Lmm hmm dmm		h mm		nm
	required	measured	required	measured	required	measured
300	420.0 ±1 %.		250.0 ±1 %.		6.35 ±1 %.	

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Ref: ACR.109.2,18.SATU,A

450	290.0 ±1 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.	PASS	89.8 ±1 %.	PASS	3.6 ±1 %.	PAS
900	149.0 ±1 %.		83,3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.		39.5 ±1 %.		3.6 ±1 %,	
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.		30.4 ±1 %.		3.6 ±1 %.	
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %.		3.6 ±1 %.	
3500	37.0±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7±1 %.		26.4 ±1 %.		3.6 ±1 %.	

## 7 VALIDATION MEASUREMENT

The IEEE Std. 1528, FCC KDBs and CEI/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

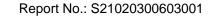
# 7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative permittivity ( $\epsilon_{r}$ ')		Conductivity (a) S/m	
	required	measured	required	measured
300	45.3 ±5 %		0.87 ±5 %	
450	43.5 ±5 %		0.87 ±5 %	
750	41.9 ±5 %		0.89 ±5 %	
835	41.5 ±5 %	PASS	0.90 ±5 %	PASS
900	41.5 ±5 %		0.97 ±5 %	
1450	40.5 ±5 %		1.20 ±5 %	
1500	40.4 ±5 %		1.23 ±5 %	
1640	40.2 ±5 %		1.31 ±5 %	
1750	40.1 ±5 %		1.37 ±5 %	

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Ref. ACR 109,2:18.SATU.A

1800	40.0 ±5 %	1.40 ±5 %
1900	40.0 ±5 %	1.40 ±5 %
1950	40.0 ±5 %	1.40 ±5 %
2000	40.0 ±5 %	1.40 ±5 %
2100	39.8 ±5 %	1.49 ±5 %
2300	39.5 ±5 %	1.67 ±5 %
2450	39.2 ±5 %	1.80 ±5 %
2600	39.0 ±5 %	1.96 ±5 %
3000	38.5 ±5 %	2.40 ±5 %
3500	37.9 ±5 %	2.91 ±5 %

# 7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

Software	OPENSAR V4		
Phantom	SN 20/09 SAM71		
Probe	SN 18/11 EPG122		
Liquid	Head Liquid Values: eps': 40.0 sigma: 0.90		
Distance between dipole center and liquid	15.0 mm		
Area scan resolution	dx=8mm/dy=8mm		
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm		
Frequency	835 MHz		
Input power	20 dBm		
Liquid Temperature	21 °C		
Lab Temperature	21 °C		
Lab Humidity	45 %		

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56	9.55 (0.95)	6.22	6.10 (0.61
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	

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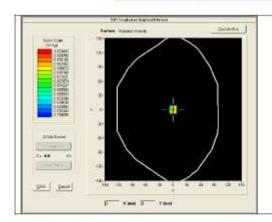


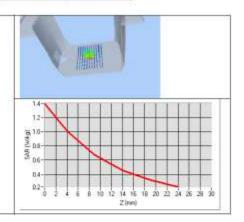


## SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref. ACR.109.2.18.SATU.A

10.00000		500 m = 1
1900	39.7	20.5
1950	40.5	20.9
2000	41.1	21.1
2100	43.6	21.9
2300	48.7	23.3
2450	52.4	24
2600	55.3	24.6
3000	63.8	25.7
3500	67.1	25
3700	67.4	24.2





# 7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity $(\epsilon_{r}')$		Conductivity (a) S/m	
-2.00000	required	measured	required	measured
150	61.9 ±5 %		0.80 ±5 %	
300	58.2 ±5 %		0.92 ±5 %	
450	56.7 ±5 %		0.94 ±5 %	
750	55.5 ±5 %		0.96 ±5 %	
835	55.2 ±5 %	PASS	0.97 ±5 %	PASS
900	55.0 ±5 %		1.05 ±5 %	
915	55.0 ±5 %		1.06 ±5 %	
1450	54.0 ±5 %		1.30 ±5 %	
1610	53.8 ±5 %		1.40 ±5 %	
1800	53.3 ±5 %		1.52 ±5 %	
1900	53.3 ±5 %		1.52 ±5 %	
2000	53.3 ±5 %		1.52 ±5 %	
2100	53.2 ±5 %		1.62 ±5 %	

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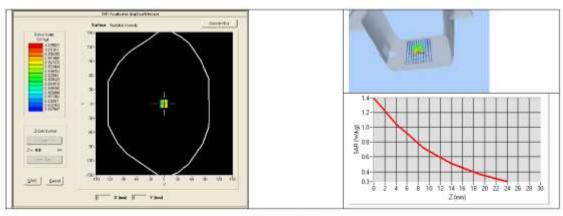
Ref. ACR.109.2.18.SATU.A

2300	52.9 ±5 %	1.81 ±5 %
2450	52.7 ±5 %	1.95 ±5 %
2600	52.5 ±5 %	2.16 ±5 %
3000	52.0 ±5 %	2.73 ±5 %
3500	51.3 ±5 %	3.31 ±5 %
3700	51.0 ±5 %	3.55 ±5 %
5200	49.0 ±10 %	5.30 ±10 %
5300	48.9 ±10 %	5.42 ±10 %
5400	48.7 ±10 %	5.53 ±10 %
5500	48.6 ±10 %	5.65 ±10 %
5600	48.5 ±10 %	5.77 ±10 %
5800	48.2 ±10 %	6.00 ±10 %

# 7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V4		
Phantom	SN 20/09 SAM71		
Probe	SN 18/11 EPG122		
Liquid	Body Liquid Values: eps'; 57.5 sigma: 0.96		
Distance between dipole center and liquid	15.0 mm		
Area scan resolution	dx=8mm/dy=8mm		
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm		
Frequency	835 MHz		
Input power	20 dBm		
Liquid Temperature	21 °C		
Lab Temperature	21 °C		
Lab Humidity	45 %		

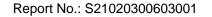
Frequency MHz	1 g SAR (W/kg/W)	10 g SAR (W/kg/W)	
	measured	measured	
835	9.83 (0.98)	6.45 (0.64)	



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Ref. ACR 109.2.18.SATU.A

# 8 LIST OF EQUIPMENT

Equipment Summary Sheet						
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date		
SAM Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No ca required.		
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No ca required.		
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2016	02/2019		
Calipers	Carrera	CALIPER-01	01/2017	01/2020		
Reference Probe	MVG	EPG122 SN 18/11	10/2017	10/2018		
Multimeter	Keithley 2000	1188656	01/2017	01/2020		
Signal Generator	Agilent E4438C	MY49070581	01/2017	01/2020		
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.		
Power Meter	HP E4418A	US38261498	01/2017	01/2020		
Power Sensor	HP ECP-E26A	US37181460	01/2017	01/2020		
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.		
Temperature and Humidity Sensor	Control Company	150798832	11/2017	11/2020		







# SAR Reference Dipole Calibration Report

Ref: ACR.109.5.18.SATU.A

# SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET, BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA MVG COMOSAR REFERENCE DIPOLE

> FREQUENCY: 1900 MHZ SERIAL NO.: SN 03/15 DIP 1G900-350

Calibrated at MVG US 2105 Barrett Park Dr. - Kennesaw, GA 30144



Calibration Date: 04/19/2018

## Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed in MVG USA using the COMOSAR test bench. All calibration results are traceable to national metrology institutions.



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Report No.: S21020300603001



# SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref. ACR.109.5.18.SATU.A

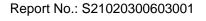
	Name	Function	Date	Signature
Prepared by :	Jérôme LUC	Product Manager	4/19/2018	25
Checked by :	Jérôme LUC	Product Manager	4/19/2018	JES
Approved by :	Kim RUTKOWSKI	Quality Manager	4/19/2018	mem theethoustu

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

Issue	Date	Modifications
A	4/19/2018	Initial release
	-17 (0.5.2 700 500	









Ref: ACR,109.5.18.SATU.A

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# 1 INTRODUCTION

This document contains a summary of the requirements set forth by the IEEE 1528, FCC KDBs and CEI/IEC 62209 standards for reference dipoles used for SAR measurement system validations and the measurements that were performed to verify that the product complies with the fore mentioned standards.

## 2 DEVICE UNDER TEST

Device Under Test				
Device Type	COMOSAR 1900 MHz REFERENCE DIPOLE			
Manufacturer	MVG			
Model	SID1900			
Serial Number	SN 03/15 DIP 1G900-350			
Product Condition (new / used)	Used			

A yearly calibration interval is recommended.

## 3 PRODUCT DESCRIPTION

# 3.1 GENERAL INFORMATION

MVG's COMOSAR Validation Dipoles are built in accordance to the IEEE 1528, FCC KDBs and CEI/IEC 62209 standards. The product is designed for use with the COMOSAR test bench only.



Figure 1 - MVG COMOSAR Validation Dipole

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## 4 MEASUREMENT METHOD

The IEEE 1528, FCC KDBs and CEI/IEC 62209 standards provide requirements for reference dipoles used for system validation measurements. The following measurements were performed to verify that the product complies with the fore mentioned standards.

# 4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards.

# 4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimensions frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness.

#### 5 MEASUREMENT UNCERTAINTY

All uncertainties listed below represent an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2, traceable to the Internationally Accepted Guides to Measurement Uncertainty.

## 5.1 RETURN LOSS

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Los		
400-6000MHz	0.1 dB		

# 5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length		
3 - 300	0.05 mm		

## 5.3 VALIDATION MEASUREMENT

The guidelines outlined in the IEEE 1528, FCC KDBs, CENELEC EN50361 and CEI/IEC 62209 standards were followed to generate the measurement uncertainty for validation measurements.

Scan Volume	Expanded Uncertainty		
1 g	20.3 %		

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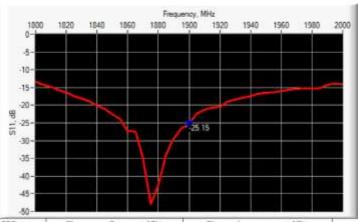
## SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR 109,5.18.SATU.A.

10 g	20.1 %
L. C.	

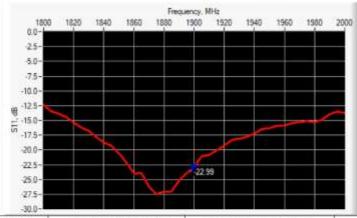
## 6 CALIBRATION MEASUREMENT RESULTS

# 6.1 RETURN LOSS AND IMPEDANCE IN HEAD LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-25.15	-20	$52.6 \Omega + 5.1 j\Omega$

# 6.2 RETURN LOSS AND IMPEDANCE IN BODY LIQUID



Frequency (MHz)	Return Loss (dB)	Requirement (dB)	Impedance
1900	-22.99	-20	$47.6 \Omega + 6.5 j\Omega$

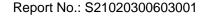
# 6.3 MECHANICAL DIMENSIONS

Frequency MHz	Lm	m	h m	m.	d n	nm
	required	measured	required	measured	required	measured
300	420.0 ±1 %.		250.0 ±1 %.		6.35 ±1 %.	

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			- 1			
450	290.0 ±1 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.	PASS	39.5 ±1 %.	PASS	3.6 ±1 %.	PASS
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.		30.4 ±1 %.		3.6 ±1 %.	
2600	48.5 ±1 %.		28.8 ±1 %.		3.6 ±1 %.	
3000	41.5 ±1 %.		25.0 ±1 %		3.6 ±1 %.	
3500	37.0±1 %.		26.4 ±1 %.		3.6 ±1 %.	
3700	34.7±1 %.		26.4 ±1 %.		3.6 ±1 %.	

# 7 VALIDATION MEASUREMENT

The IEEE Std. 1528, FCC KDBs and CEI/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

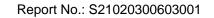
# 7.1 HEAD LIQUID MEASUREMENT

Frequency MHz	Relative per	mittivity (ε,′)	Conductivity (a) S/m		
	required	measured	required	measured	
300	45.3 ±5 %		0.87 ±5 %		
450	43.5 ±5 %		0.87 ±5 %		
750	41.9 ±5 %		0.89 ±5 %		
835	41.5 ±5 %		0.90 ±5 %		
900	41.5 ±5 %		0.97 ±5 %		
1450	40.5 ±5 %		1.20 ±5 %		
1500	40.4 ±5 %		1.23 ±5 %		
1640	40.2 ±5 %	1.31 ±5 %			
1750	40.1 ±5 %		1,37 ±5 %		

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1800	40.0 ±5 %		1.40 ±5 %	
1900	40.0 ±5 %	PASS	1.40 ±5 %	PASS
1950	40.0 ±5 %		1.40 ±5 %	
2000	40.0 ±5 %		1.40 ±5 %	
2100	39.8 ±5 %		1.49 ±5 %	
2300	39.5 ±5 %		1.67 ±5 %	
2450	39.2 ±5 %		1.80 ±5 %	
2600	39.0 ±5 %		1.96 ±5 %	
3000	38.5 ±5 %		2.40 ±5 %	
3500	37.9 ±5 %		2.91 ±5 %	

# 7.2 SAR MEASUREMENT RESULT WITH HEAD LIQUID

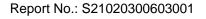
The IEEE Std. 1528 and CEI/IEC 62209 standards state that the system validation measurements should produce the SAR values shown below (for phantom thickness of 2 mm), within the uncertainty for the system validation. All SAR values are normalized to 1 W forward power. In bracket, the measured SAR is given with the used input power.

Software	OPENSAR V4		
Phantom	SN 20/09 SAM71		
Probe	SN 18/11 EPG122		
Liquid	Head Liquid Values: eps' : 38.5 sigma : 1.45		
Distance between dipole center and liquid	10.0 mm		
Area scan resolution	dx=8mm/dy=8mm		
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm		
Frequency	1900 MHz		
Input power	20 dBm		
Liquid Temperature	21 °C		
Lab Temperature	21 °C		
Lab Humidity	45 %		

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR (W/kg/W)	
	required	measured	required	measured
300	2,85		1.94	
450	4.58		3.06	
750	8,49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30,5		16,8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4	38.4		

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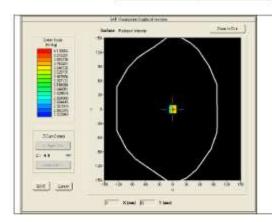


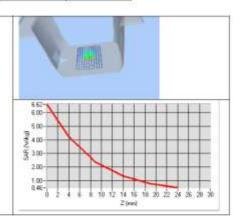




Ref. ACR.109.5.18.SATU.A

1900	39.7	38.92 (3.89)	20.5	20.09 (2.01)
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4		24	
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	
3700	67.4		24.2	





# 7.3 BODY LIQUID MEASUREMENT

Frequency MHz	Relative permittivity (ε,')		Conductivity (a) S/m		
. M. A. M. Marris	required	measured	required	measured	
150	61.9 ±5 %		0.80 ±5 %		
300	58.2 ±5 %		0.92 ±5 %		
450	56.7 ±5 %		0.94 ±5 %		
750	55.5 ±5 %		0.96 ±5 %		
835	55.2 ±5 %		0.97 ±5 %		
900	55.0 ±5 %		1.05 ±5 %		
915	55.0 ±5 %		1.06 ±5 %		
1450	54.0 ±5 %		1.30 ±5 %		
1610	53.8 ±5 %		1.40 ±5 %		
1800	53.3 ±5 %		1.52 ±5 %	-	
1900	53.3 ±5 %	PASS	1.52 ±5 %	PASS	
2000	53,3 ±5 %	1.52 ±5 %			
2100	53.2 ±5 %		1.62 ±5 %		

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## SAR REFERENCE DIPOLE CALIBRATION REPORT

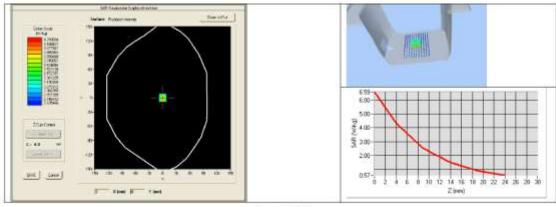
Ref. ACR.109.5.18.SATU.A

2300	52.9 ±5 %	1.81 ±5 %
2450	52.7 ±5 %	1.95 ±5 %
2600	52.5 ±5 %	2.16 ±5 %
3000	52.0 ±5 %	2.73 ±5 %
3500	51.3 ±5 %	3.31 ±5 %
3700	51.0 ±5 %	3.55 ±5 %
5200	49.0 ±10 %	5.30 ±10 %
5300	48.9 ±10 %	5.42 ±10 %
5400	48.7 ±10 %	5,53 ±10 %
5500	48.6 ±10 %	5.65 ±10 %
5600	48.5 ±10 %	5.77 ±10 %
5800	48.2 ±10 %	6.00 ±10 %

# 7.4 SAR MEASUREMENT RESULT WITH BODY LIQUID

Software	OPENSAR V4			
Phantom	SN 20/09 SAM71			
Probe	SN 18/11 EPG122			
Liquid	Body Liquid Values: eps' : 53.3 sigma : 1.56			
Distance between dipole center and liquid	10.0 mm			
Area scan resolution	dx=8mm/dy=8mm			
Zoon Scan Resolution	dx=8mm/dy=8mm/dz=5mm			
Frequency	1900 MHz			
Input power	20 dBm			
Liquid Temperature	21 °C			
Lab Temperature	21 °C			
Lab Humidity	45 %			

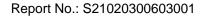
Frequency MHz	1 g SAR (W/kg/W)	10 g SAR (W/kg/W)
	measured	measured
1900	39.02 (3.90)	20.57 (2.06)



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Ref: ACR.109.5.18.SATU.A

# 8 LIST OF EQUIPMENT

Equipment Summary Sheet						
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date		
SAM Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.		
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.		
Network Analyzer	Rhode & Schwarz ZVA	SN100132	02/2016	02/2019		
Calipers	Carrera	CALIPER-01	01/2017	01/2020		
Reference Probe	MVG	EPG122 SN 18/11	10/2017	10/2018		
Multimeter	Keithley 2000	1188656	01/2017	01/2020		
Signal Generator	Agilent E4438C	MY49070581	01/2017	01/2020		
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.		
Power Meter	HP E4418A	US38261498	01/2017	01/2020		
Power Sensor	HP ECP-E26A	US37181460	01/2017	01/2020		
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.		
Temperature and Humidity Sensor	Control Company	150798832	11/2017	11/2020		



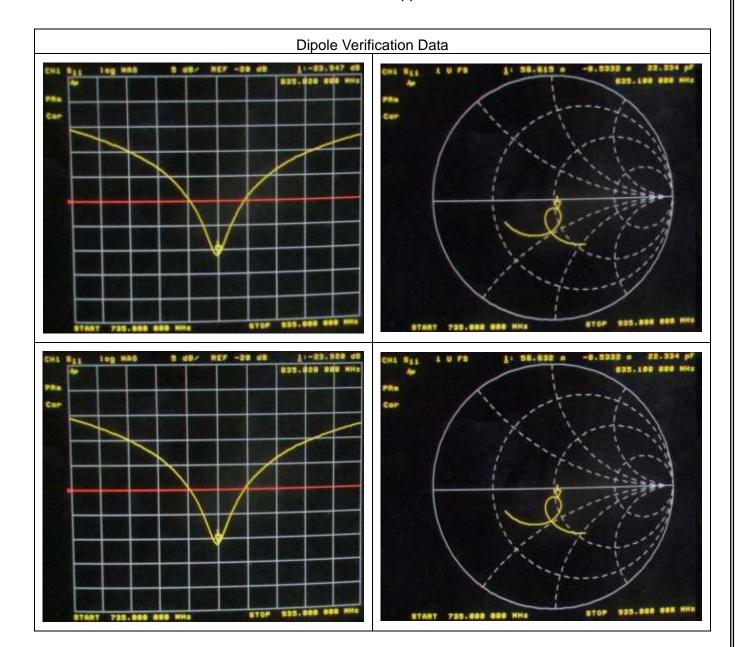
# <Justification of the extended calibration>

If dipoles are verified in return loss (<-20dB, within 20% of prior calibration for below 3GHz, and <-8dB, within 20% of prior calibration for 5GHz to 6GHz), and in impedance (within 5 ohm of prior calibration), the annual calibration is not necessary and the calibration interval can be extended.

# <Head 835MHz>

Return Loss (dB)	Delta (%)	Impedance	Delta(ohm)	Date of Measurement
-23.67	-	56.8	-	Apr. 19, 2018
-23.947	1.17	56.615	0.185	Apr. 18, 2019
-23.920	1.056	56.632	0.168	Apr. 17, 2020

The return loss is <-20dB, within 20% of prior calibration; the impedance is within 5 ohm of prior calibration. Therefore the verification result should support extended calibration.

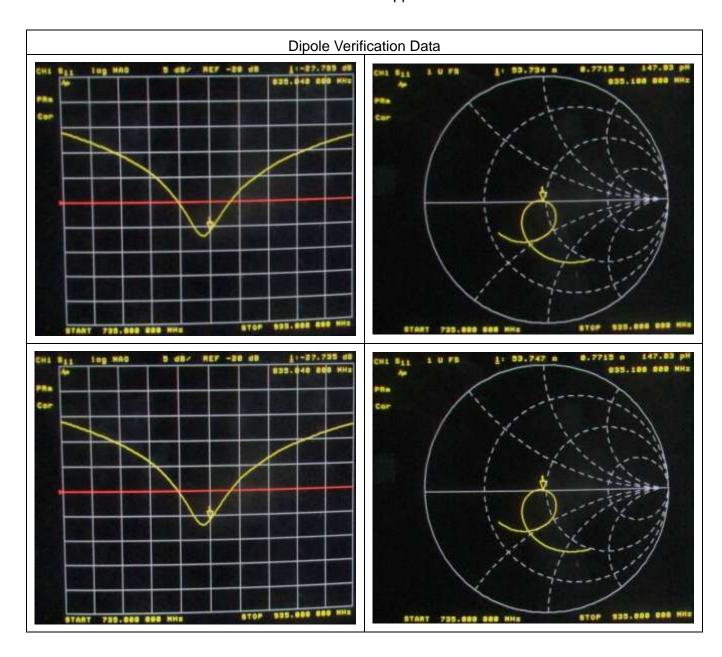




<Body 835MHz>

Return Loss (dB)	Delta (%)	Impedance	Delta(ohm)	Date of Measurement
-27.64	-	53.5	-	Apr. 19, 2018
-27.789	0.54	53.734	0.234	Apr. 18, 2019
-27.735	0.344	53.747	0.247	Apr. 17, 2020

The return loss is <-20dB, within 20% of prior calibration; the impedance is within 5 ohm of prior calibration. Therefore the verification result should support extended calibration.

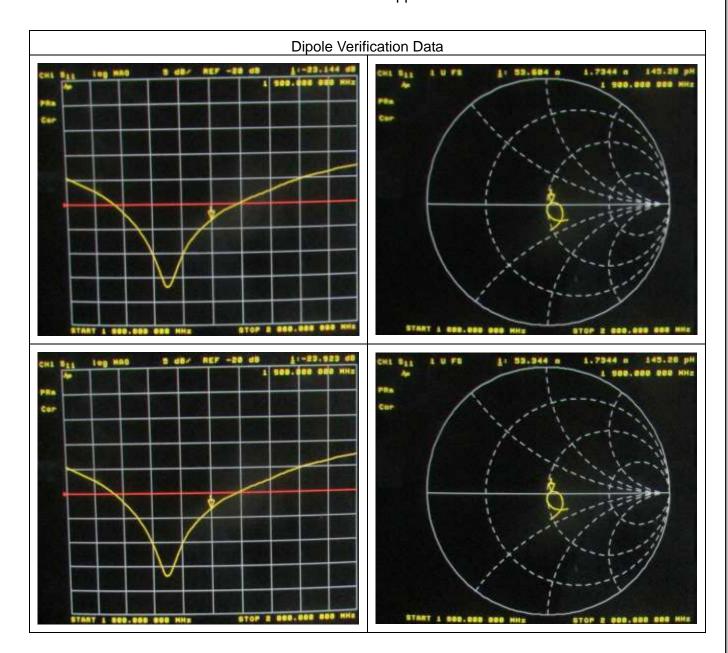




# <Head 1900MHz>

Return Loss (dB)	Delta (%)	Impedance	Delta(ohm)	Date of Measurement
-25.15	-	52.6	-	Apr. 19, 2018
-23.144	7.976	53.604	1.004	Apr. 18, 2019
-23.923	4.879	53.344	0.744	Apr. 17, 2020

The return loss is <-20dB, within 20% of prior calibration; the impedance is within 5 ohm of prior calibration. Therefore the verification result should support extended calibration.





<Body 1900MHz>

Return Loss (dB)	Delta (%)	Impedance	Delta(ohm)	Date of Measurement
-22.99	-	47.6	-	Apr. 19, 2018
-22.679	1.353	49.311	1.711	Apr. 18, 2019
-22.690	1.305	49.385	1.785	Apr. 17, 2020

The return loss is <-20dB, within 20% of prior calibration; the impedance is within 5 ohm of prior calibration. Therefore the verification result should support extended calibration.

