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FCC SAR TEST REPORT

SUCR2412000516AT **Application No.:**

Applicant: Hong Kong Future Intelligent Technology Co., Ltd

Room 1450 14/F, Eton Tower, 8 Hysan Avenue, Causeway Bay, Hong Kong, Manufacturer:

China

Product Name: viaim NoteKit Model No.(EUT): XFVI-D95 **Trade Mark:** viaim

FCC ID: 2BKBC-XFVI-D95 FCC 47CFR §2.1093 Standards:

Date of Receipt: 2024-11-11 Date of Test: 2024-12-11 Date of Issue: 2024-12-11 PASS * Test conclusion:

Prepared by: Leon Liu/ Project Manager

Approved by: Nick HU/ Technical Manager

Nick Hu

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In the configuration tested, the EUT detailed in this report complied with the standards specified above.



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Revision Record			
Version	Description	Date	Remark
01	Original	2024/12/11	

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TEST SUMMARY

Fraguency Pand	Maximum Reported SAR(W/kg)	
Frequency Band	Body 5mm	
Bluetooth	0.16	
SAR Limited(W/kg)	1.6	

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1 EUT Antenna Locations

The EUT Antenna Locations can refer to Appendix D.

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SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd.
Wireless Laboratory

South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu) Pilot Free Trade Zone 215000 t (86-512) 62992980 www.sgsgroup.com.cn



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2 General Information

2.1 Details of Client

Applicant:	Hong Kong Future Intelligent Technology Co., Limited
Address:	ROOM 1450 14/F ETON TOWER8 HYSAN AVENUE CAUSEWAY BAY HK
Manufacturer:	Hong Kong Future Intelligent Technology Co., Limited
Address:	ROOM 1450 14/F ETON TOWER8 HYSAN AVENUE CAUSEWAY BAY HK

2.2 Test Location

Company:	SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd.
Address:	South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu) Pilot Free Trade Zone
Post code:	215000
Test Engineer:	Alan-Zhang

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2.3 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

A2LA (Certificate No. 6336.01)

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 6336.01.

Innovation, Science and Economic Development Canada

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0120.

IC#: 27594.

FCC –Designation Number: CN1312

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. has been recognized as an

accredited testing laboratory. Designation Number: CN1312.

Test Firm Registration Number: 717327

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2.4 General Description of EUT

Device Type :	portable device		
Exposure Category:	uncontrolled environment / general population		
Product Name:	viaim NoteKit		
Model No.(EUT):	XFVI-D95		
FCC ID:	2BKBC-XFVI-D95		
Trade Mark:	viaim		
Firmware Version:	V1.1.9		
Device Operating Configuration	ns:		
Modulation Mode:	BT: GFSK, π/4DQPSK,8DPSK BLE: GFSK		
Device Class:	В		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
Trequency bands.	BT	2402~2480	2402~2480
RF Cable:			
Power Supply: By USB or Type-C			
Note: *Since the above data and/or information is provided by the client relevant results or conclusions of this report are only made for these data and/or information, SGS is not responsible for the authenticity, integrity and results of the data			

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2.5 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 447498 D01	General RF Exposure Guidance v06
KDB 447498 D02	SAR Procedures for Dongle Xmtr v02r01
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02

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2.6 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	1.60 mW/g	8.00 mW/g
Spatial Average SAR** (Whole Body)	0.08 mW/g	0.40 mW/g
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 mW/g	20.00 mW/g

Notes:

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

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

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^{*} The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time

^{**} The Spatial Average value of the SAR averaged over the whole body.

^{***} The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.



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3 **Laboratory Environment**

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

Table 1: The Ambient Conditions

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4 SAR Measurements System Configuration

4.1 The SAR Measurement System

This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

The DASY5 system for performing compliance tests consists of the following items:

A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software .An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

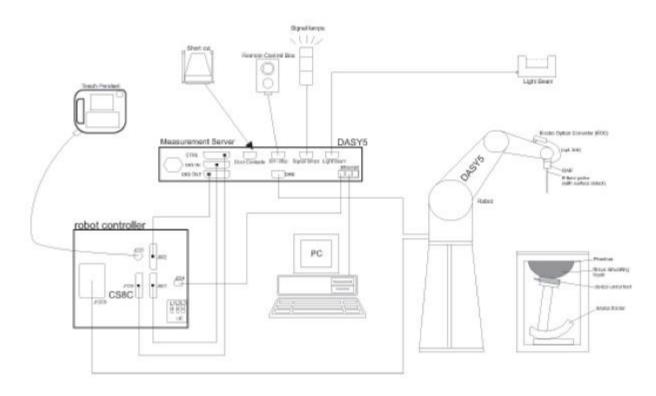
The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.

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F-1. SAR Measurement System Configuration

- 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.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7.
- DASY5 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

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4.2 Isotropic E-field Probe EX3DV4

	Symmetrical design with triangular core
	Built-in shielding against static charges
	PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 <u>calibration service</u> available.
Frequency	10 MHz to > 6 GHz
	Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in TSL (rotation around probe axis)
	± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μW/g to > 100 mW/g
	Linearity: ± 0.2 dB (noise: typically < 1 μW/g)
Dimensions	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
Application	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%.
Compatibility	DASY52 SAR and higher, EASY4/MRI

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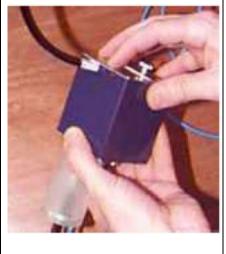


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4.3 Data Acquisition Electronics (DAE)

Model	DAE
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)
Input Offset Voltage	< 5μV (with auto zero)
Input Bias Current	< 50 f A
Dimensions	60 x 60 x 68 mm



4.4 SAM Twin Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet
Filling Volume	approx. 25 liters
Wooden Support	SPEAG standard phantom table



The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

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4.5 ELI Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)
Liquid	Compatible with all SPEAG tissue
Compatibility	simulating liquids (incl. DGBE type)
Shell Thickness	2.0 ± 0.2 mm (bottom plate)
Dimensions	Major axis: 600 mm
	Minor axis: 400 mm
Filling Volume	approx. 30 liters
Wooden Support	SPEAG standard phantom table



The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 4 MHz to 10 GHz. ELI is fully compatible with the IEC/IEEE 62209-1528 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all of SPEAG's dosimetric probes and dipoles.

ELI V5.0 and higher has the same shell geometry and is manufactured from the same material as ELI V4.0 but has a reinforced top structure.

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4.6 Device Holder for Transmitters



F-2. Device Holder for Transmitters

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\varepsilon=3$ and loss tangent $\delta=0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

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Measurement procedure

4.7.1 Scanning procedure

Step 1: Power reference measurement

The "reference" and "drift" measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: Area scan

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm.Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Zoom scan

Around this point, a volume of 32mm*32mm*30mm (f≤2GHz), 30mm*30mm*30mm (f for 2-3GHz) and 24mm*24mm*22mm (f for 5-6GHz) was assessed by measuring 5x5x7 points (f≤2GHz), 7x7x7 points (f for 2-3GHz) and 7x7x12 points (f for 5-6GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification). 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. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

The area and zoom scan resolutions specified in the table below must be applied to the SAR measurements Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.

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			≤ 3 GHz	> 3 GHz
Maximum distance from (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°
			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
Maximum area scan sp	atial resolı	ation: ∆x _{Area} , ∆y _{Area}	When the x or y dimension o measurement plane orientation the measurement resolution r x or y dimension of the test d measurement point on the test	on, is smaller than the above, must be ≤ the corresponding levice with at least one
Maximum zoom scan s	patial reso	lution: Δx _{Zoom} , Δy _{Zoom}	\leq 2 GHz: \leq 8 mm 3 - 4 GHz: \leq 5 mm 2 - 3 GHz: \leq 5 mm 4 - 6 GHz: \leq 4 mm	
	uniform	grid: ∆z _{Z∞m} (n)	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
Maximum zoom scan spatial resolution, normal to phantom surface	graded	Δz _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
	grid $\Delta z_{Z_{00m}}(n>1)$: between subsequent points		≤ 1.5·Δz	Zoom(n-1)
Minimum zoom scan volume			≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max. \pm 5 %

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4.7.2 Data Storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension ".DAE4". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated. The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [m W/g], [m W/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

4.7.3 Data Evaluation by SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters: - Sensitivity Normi, ai0, ai1, ai2

Conversion factor
 Diode compression point
 Device parameters: - Frequency

Device parameters: - Frequency f
- Crest factor cf

Media parameters: - Conductivity

- Density ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

3

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

 $V_i = U_i + U_i^2 \cdot c f / d c p_i$

With Vi = compensated signal of channel i (i = x, y, z)

Ui = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated: E-field probes:

 $E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$

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H-field probes:

H-field probes:
$$H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1}f + a_{i2}f^2) / f$$
 With $V_i =$ compensated signal of channel i $(i = x, y, z)$

With Vi = compensated signal of channel i

Normi = sensor sensitivity of channel I

[mV/(V/m)2] for E-field Probes

ConvF = sensitivity enhancement in solution

aij = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

Ei = electric field strength of channel i in V/m

Hi = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = (E_x^2 + E_y^2 + E_z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$SAR = \left(Etot^2 \cdot \sigma \right) / \left(\varepsilon \cdot 1000 \right)$$

SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

 σ = conductivity in [mho/m] or [Siemens/m]

ε= equivalent tissue density in g/cm3

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}^2 \frac{2}{3770} \,_{or} \, P_{pwe} = H_{tot}^2 \cdot 37.7$$

Ppwe = equivalent power density of a plane wave in mW/cm2

Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m

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5 SAR measurement variability and uncertainty

5.1 SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, 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 remounted 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 ≥ 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. The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

5.2 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.

Measurements and results are all in compliance with the standards listed. All measurements and results are recorded and maintained at the laboratory performing the tests and measurement uncertainties are taken into account when comparing measurements to pass/ fail criteria. The expanded uncertainty (95% CONFIDENCE INTERVAL) is 23.01%.

a	b	С	d = f(d,k)	F	i = C*g/e	K
Uncertainty Component	Tol (%)	Prob.Dist.	Div.	Ci (1g)	1g ui (%)	Vi(Veff)
Probe calibration	6.65	N	1	1	6.65	8
Axial isotropy	0.5	R	√3	1	0.29	8
hemispherical isotropy	2.6	R	√3	1	1.50	8
Linearity	0.6	R	√3	1	0.35	8
Probe modulation response	0	R	$\sqrt{3}$	1	0.00	8
Detection limits	0.25	R	$\sqrt{3}$	1	0.14	8

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-						
Boundary effect	1.0	R	√3	1	0.58	∞
Readout electronics	0.3	N	1	1	0.30	∞
Response time	0	R	√3	1	0.00	∞
Integration time	2.6	R	√3	1	1.50	8
RF ambient conditions – noise	3	R	√3	1	1.73	∞
RF ambient conditions – reflections	3	R	√3	1	1.73	∞
Probe positioner mech. restrictions	1.5	R	√3	1	0.87	∞
Probe positioning with respect to phantom shell	2.9	R	√3	1	1.67	∞
Post-processing	1	R	√3	1	0.58	∞
Device holder uncertainty	3.6	N	1	1	3.60	∞
Test sample positioning	3.7	N	1	1	3.70	9
Power scaling	5.0	R	√3	1	2.89	∞
Drift of output power (measured SAR drift)	5	R	√3	1	2.89	∞
Phantom uncertainty (shape and thickness tolerances)	4	R	√3	1	2.31	∞
Algorithm for correcting SAR for deviations in permittivity and conductivity	1.9	N	1	1	1.90	∞
Liquid conductivity (meas.)	5.78	N	1	0.78	4.51	4
Liquid permittivity (meas.)	0.62	N	1	0.23	0.14	5
Liquid permittivity –temperature uncertainty	0.2	R	√3	0.78	0.09	∞
Liquid conductivity –temperature uncertainty	071	∞				
Combined standard uncertainty RSS	11.51	417				
Expanded uncertainty (95% CONFIDENCE INTER	23.01					
Table 1 Magazrament Uncertainty		· · · · · · · · · · · · · · · · · · ·			·	

Table 1: Measurement Uncertainty.

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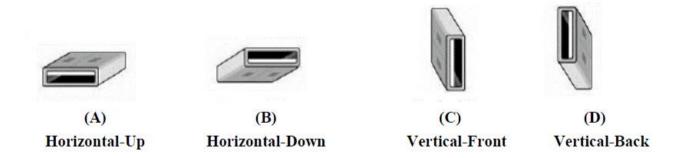
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Description of Test Position

6.1 USB dongle device

Test all USB orientations [see figure below: (A) Horizontal-Up, (B) Horizontal-Down, (C) Vertical-Front, and (D) Vertical-Back] with a device-to-phantom separation distance of 5 mm or less, according to KDB Publication 447498 D01 requirements. These test orientations are intended for the exposure conditions found in typical laptop/notebook/netbook or tablet computers with either horizontal or vertical USB connector configurations at various locations in the keyboard section of the computer. Current generation portable host computers should be used to establish the required SAR measurement separation distance. The same test separation distance must be used to test all frequency bands and modes in each USB orientation. The typical Horizontal-Up USB connection (A), found in the majority of host computers, must be tested using an appropriate host computer. A host computer with either Vertical-Front (C) or Vertical-Back (D) USB connection should be used to test one of the vertical USB orientations. If a suitable host computer is not available for testing the Horizontal-Down (B) or the remaining Vertical USB orientation, a high quality USB cable, 12 inches or less, may be used for testing these other orientations. It must be documented that the USB cable does not influence the radiating characteristics and output power of the transmitter.

The 5 mm test separation distance used for testing simple dongles has been established based on the overall host platform (laptop/notebook/netbook) and device variations, and varying user operating configurations and exposure conditions expected for a peripheral device. The same test distance should generally apply to dongles with swivel or rotating connectors. The procedures described for simple dongles should be used to position the four surfaces of the dongle at 5 mm from the phantom to evaluate SAR. At least one of the horizontal and one of the vertical positions should be tested using an applicable host computer.



F-3. USB Connector Orientations Implemented on Laptop Computers

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7 SAR System Verification Procedure

7.1 Tissue Simulate Liquid

7.1.1 Recipes for Tissue Simulate Liquid

The bellowing tables give the recipes for tissue simulating liquids to be used in different frequency bands:

Ingredients	Frequency (MHz)										
(% by weight)	450	700-900	1750-2000	2300-2500	2500-2700						
Water	38.56	40.30	55.24	55.00	54.92						
Salt (NaCl)	3.95	1.38	0.31	0.2	0.23						
Sucrose	56.32	57.90	0	0	0						
HEC	0.98	0.24	0	0	0						
Bactericide	0.19	0.18	0	0	0						
Tween	0	0	44.45	44.80	44.85						

Sucrose: 98+% Pure Sucrose

HEC: Hydroxyethyl Cellulose

Salt: 99+% Pure Sodium Chloride Water: De-ionized, 16 MΩ+ resistivity

Tween: Polyoxyethylene (20) sorbitan monolaurate

HSL13MHz is composed of the following ingredients:

Water: 50-90%

Non-ionic detergents: 5-50%

Nacl: 0-2%

Preservative: 0.03-0.1%

HSL5GHz is composed of the following ingredients:

Water: 50-65%
Mineral oil: 10-30%
Emulsifiers: 8-25%
Sodium salt: 0-1.5%

Table 2: Recipe of Tissue Simulate Liquid

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7.1.2 Measurement for Tissue Simulate Liquid

The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was 22±2°C.

	Measurement for Tissue Simulate Liquid													
T' T	Measured	Target Tis	sue (±5%)	Measure	d Tissue	Liquid								
Tissue Type	Frequency (MHz)	ε _r	σ(S/m)	ε _r	σ(S/m)	Temp. (℃)	Test Date							
2450 Head	2450	39.20	1.80	38.744	1.809	22.9	2024/12/11							

Table 3: Measurement result of Tissue electric parameters.

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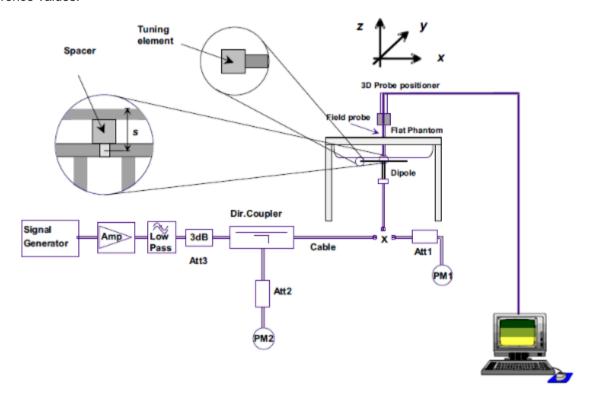


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7.2 SAR System Check

The microwave circuit arrangement for system Check is sketched in F-12. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table (A power level of 250mW (below 3GHz) or 100mW (3-6GHz) was input to the dipole antenna). During the tests, the ambient temperature of the laboratory was in the range 22±2°C, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above 15±0.5 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



F-4. the microwave circuit arrangement used for SAR system check

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7.2.1 **Justification for Extended SAR Dipole Calibrations**

- 1) Referring to KDB865664 D01 requirements for dipole calibration, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
- a) There is no physical damage on the dipole;
- b) System check with specific dipole is within 10% of calibrated value;
- c) Return-loss is within 10% of calibrated measurement;
- d) Impedance is within 5Ω from the previous measurement.
- 2) Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

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7.2.2 Summary System Check Result(s)

	SAR System Validation Result(s)																
Validation	n Kit	Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1W)	SAR	Target SAR (normalized to 1W) (±10%)				Deviation		Deviation (Within ±10%)		normalized Deviation to 1W) (Within ±10%)		Liquid Temp.	Test Date
		1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)			(℃)							
D2450V2	Head	13.00	6.08	52.00	24.32	52.7	24.6	-1.33%	-1.14%	22.9	2024/12/11						

Table 4: SAR System Check Result.

7.2.3 Detailed System Check Results

Please see the Appendix A

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Test Result 8

8.1 Measurement of RF Conducted Power

- 1) . The frame-averaged power is linearly proportion to the slot number configured and it is linearly scaled the maximum burst-averaged power based on time slots. The calculated method is shown as below: Frame-averaged power = 10 x log (Burst-averaged power mW x Slot used / 8
- 2) . When the maximum output power variation across the required test channels is > ½ dB, instead of the middle channel, the highest output power channel must be used.

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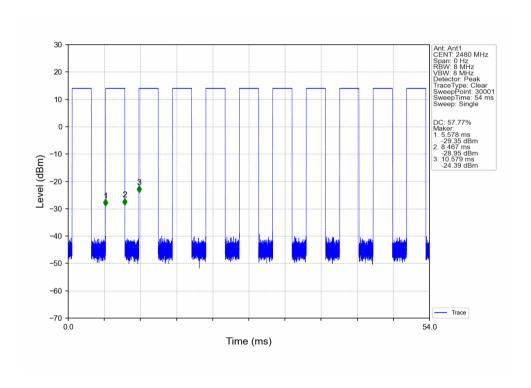
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8.1.1 Conducted Power of BT

E	ЗТ	Average Conducted Power(dBm)						
Band	Channel	0	39	78	Tune up			
	GFSK	12.16	12.09	12.43	13.00			
BT	π/4DQPSK	12.11	12.16	12.29	13.00			
	8DPSK	12.29	12.31	12.35	13.00			
Band	Band Channel		19	39	Tune up			
BLE 1M	GFSK	5.51	5.57	6.23	7.00			

Note: The conducted power of BT is measured with RMS detector. BT DH5 Duty Cycle=57.77%



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8.2 Measurement of SAR Data

Note:

- 1) This report. Graph results refer to Appendix B.
- 2) Per KDB447498 D01, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:
 - ≤ 0.8W/kg for 1-g or 2.0W/kg for 10-g respectively, when the transmission band is ≤ 100MHz.
 - ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz.
 - ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz.

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8.2.1 SAR Result of BT

	Bluetooth SAR Test Record														
Test position	Test mode	Test ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg) 1-g	Power drift (dB)	Conducted Power(dBm)	-	Scaled factor	Scaled SAR 1-g (W/kg)	Liquid Temp.(℃)				
				Body [*]	Test data	(Separa	ate 5mm)								
Horizontal-Up	DH5	78/2480	57.77%	1.731	0.082	-0.02	12.43	13.00	1.140	0.162	22.9				
Horizontal-Up With USB	DH5	78/2480	57.77%	1.731	0.078	0.15	12.43	13.00	1.140	0.153	22.9				
Horizontal-Down	DH5	78/2480	57.77%	1.731	0.046	0.06	12.43	13.00	1.140	0.091	22.9				
Vertical-Front	DH5	78/2480	57.77%	1.731	0.028	0.14	12.43	13.00	1.140	0.055	22.9				
Vertical-Back	DH5	78/2480	57.77%	1.731	0.010	0.02	12.43	13.00	1.140	0.020	22.9				
Tip Mode	DH5	78/2480	57.77%	1.731	0.001	0.03	12.43	13.00	1.140	0.002	22.9				

Table 5: SAR of BT for Body.

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9 Equipment list

	Test Platform	SPEAG DASY5 Professional											
	Description	SAR Test System	m (Frequency range	10MHz-6GHz)									
	Software Reference DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)												
	Hardware Reference												
	Equipment	Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration							
\boxtimes	Twin Phantom	SPEAG	SAM7	1702	NCR	NCR							
\boxtimes	DAE	SPEAG	DAE4	1245	2024-06-05	2025-06-04							
\boxtimes	E-Field Probe	SPEAG	EX3DV4	3793	2024-03-04	2025-03-03							
\boxtimes	Validation Kits	SPEAG	D2450V2	922	2023-08-28	2026-08-27							
\boxtimes	Agilent Network Analyzer	Agilent	E5071C	103535	2024-02-04	2025-02-03							
\boxtimes	DAKS-3.5 probes	SPEAG	DAKS-3.5	1122	NA	NA							
	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR							
\boxtimes	Signal Generator	R&S	SMB100A	182393	2024-02-05	2025-02-04							
\boxtimes	Preamplifier	Qiji	YX28980933	202104001	NCR	NCR							
	Power Sensor	Keysight	U2002H	121251	2024-09-12	2025-09-11							
	Attenuator	SHX	TS2-3dB	30704	NCR	NCR							
	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR							
\boxtimes	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR							
	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR							
\boxtimes	Speed reading thermometer	LKM	DTM3000	NA	2024-09-13	2025-09-12							
\boxtimes	Humidity and Temperature Indicator	Anymetre	Anymetre 1964	NA	2024-02-18	2025-02-17							

Note: All the equipments are within the valid period when the tests are performed.

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10 Calibration certificate

Please see the Appendix C

11 Photographs

Please see the Appendix D

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Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs



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