



中认信通

CHINA CERTIFICATION ICT CO., LTD (DONGGUAN)



SAR TEST REPORT

Applicant: VTech Telecommunications Ltd

Address: 23/F Tai Ping Ind Center Block 1 57 Ting Kok Rd Tai Po NT, Hong Kong

FCC ID: EW780-0826-00

Product Name: Cordless handset

Model Number: SN5127

Multiple Models: SN512x-ab, SN5107, SN5107-ab, SN5147, SN514x-ab

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

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

Report Number: CR230956632-SA

Date Of Issue: 2023-12-20

Reviewed By: Karl Gong

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Title: SAR Engineer

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

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SAR TEST RESULTS SUMMARY

Operation Frequency Bands	Highest Reported 1g SAR (W/kg)		Limits (W/kg)
	Head SAR	Body SAR (Gap 0mm)	
DECT	0.04	0.11	1.6
EUT Received Date:	2023/09/11		
Tested Date:	2023/10/12		
Tested Result:	Pass		

Test Facility

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

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

Declarations

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

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

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	CR230956632-SA	Original Report	2023-12-20

1. GENERAL INFORMATION

1.1 Product Description for Equipment under Test (EUT)

Device Type:	Portable
Exposure Category:	Population / Uncontrolled
Antenna Type(s):	Internal Antenna
Proximity Sensor:	None
Operation modes:	DECT, Bluetooth
Frequency Band:	DECT: 1921.536-1928.448 MHz; Bluetooth: 2402 MHz-2480 MHz
Conducted RF Power:	DECT:20.52 dBm Bluetooth (BDR/EDR): 7.76 dBm
Power Source:	Rechargeable Battery
Serial Number:	2BPS-8
Normal Operation:	Head and Body-worn
Note: The Multiple models are electrically identical with the test model. Please refer to the declaration letter for more detail, which was provided by manufacturer. All tests were performed with model: SN5127.	

1.2 Test Specification, Methods and Procedures

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

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

TCB Workshop April 2019: RF Exposure Procedures

1.3 SAR Limits

FCC Limit

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

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

Occupational/Controlled Environments are defined as locations where there is exposure that 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 Spatial Peak limit 1.6W/kg for 1g SAR applied to the EUT.

1.4 FACILITIES

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

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

<input checked="" type="checkbox"/> SAR Lab 1	<input type="checkbox"/> SAR Lab 2
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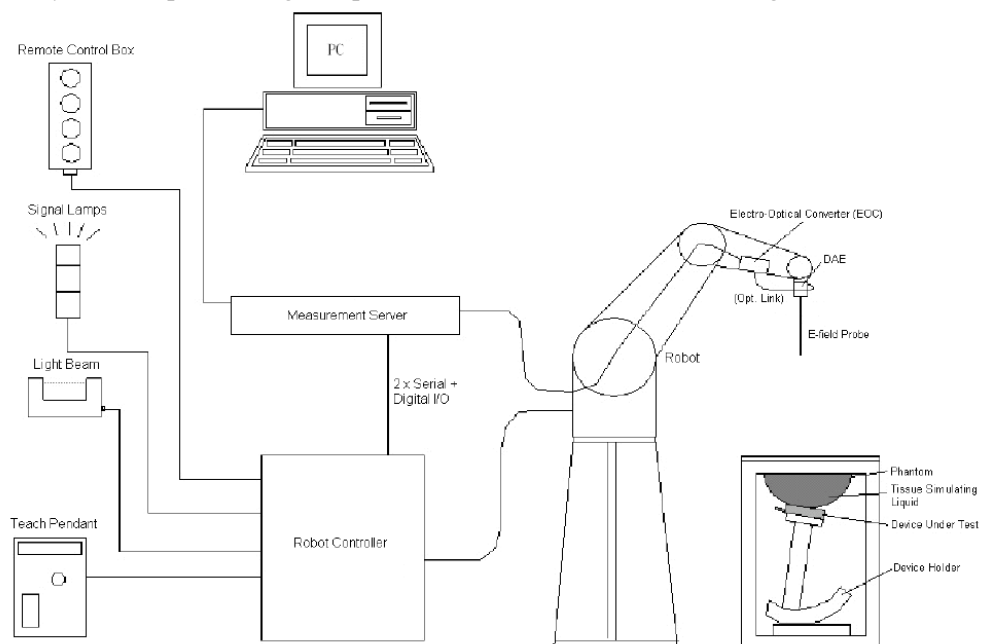
2. SAR MEASUREMENT SYSTEM

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



DASY5 System Description

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal application, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7 professional operating system and the DASY52 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

DASY5 Measurement Server

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



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

Data Acquisition Electronics

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

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

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

ES3DV3 E-Field Probes

Frequency	10 MHz - 4 GHz Linearity: ± 0.2 dB (30 MHz to 4 GHz)
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)
Dynamic Range	5 μ W/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 3.9 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 2.0 mm
Application	General dosimetry up to 4 GHz Dosimetry in strong gradient fields Compliance tests of mobile phones
Compatibility	DASY3, DASY4, DASY52, DASY6, DASY8, EASY6, EASY4/MRI

Calibration Frequency Points for ES3DV3 E-Field Probes SN: 3157 Calibrated: 2023/4/10

Calibration Frequency Point(MHz)	Frequency Range(MHz)		Conversion Factor		
	From	To	X	Y	Z
750 Head	650	850	6.48	6.48	6.48
900 Head	850	1000	6.25	6.25	6.25
1750 Head	1650	1850	5.38	5.38	5.38
1900 Head	1850	2000	5.18	5.18	5.18
2300 Head	2200	2400	4.96	4.96	4.96
2450 Head	2400	2550	4.74	4.74	4.74
2600 Head	2550	2700	4.52	4.52	4.52

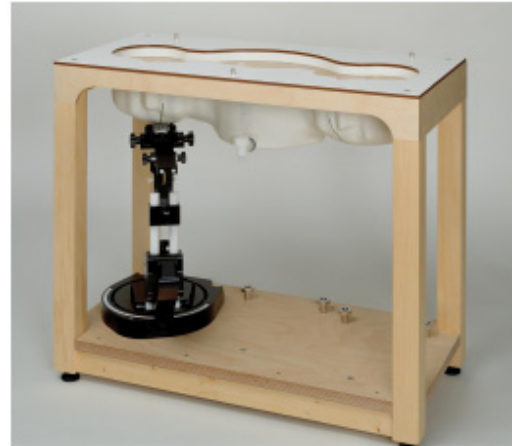
SAM Twin Phantom

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

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

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

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



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

Robots

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

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

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

SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 1.4 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scans

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

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

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm \pm 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm \pm 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 5mm, with the side length of the 10g cube is 21.5mm.

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

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

Step 4: Power Drift Measurement

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

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

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

Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE 1528-2013

Recommended Tissue Dielectric Parameters for Head liquid

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

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

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

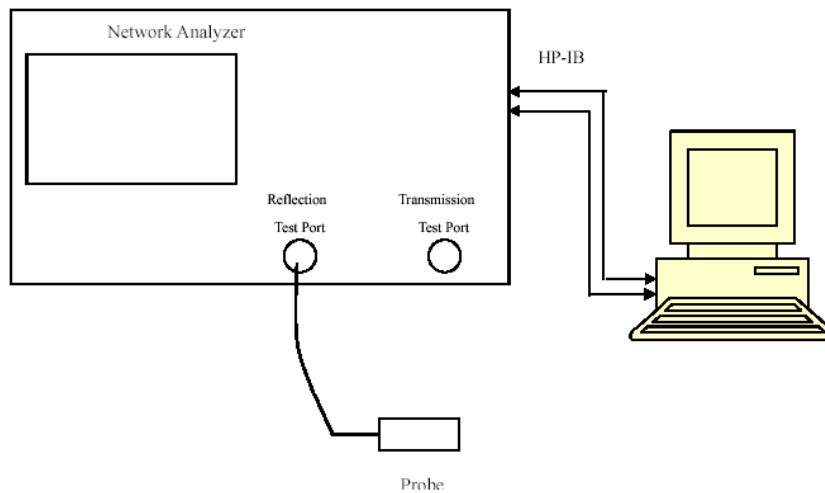
3. EQUIPMENT LIST AND CALIBRATION

3.1 Equipments List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
DASY5 Test Software	DASY52.10	N/A	NCR	NCR
DASY5 Measurement Server	DASY5 4.5.12	1567	NCR	NCR
Data Acquisition Electronics	DAE4	1493	2023/3/17	2024/3/16
E-Field Probe	ES3DV3	3157	2023/4/10	2024/4/9
Mounting Device	MD4HHTV5	BJPCTC0152	NCR	NCR
Twin SAM	Twin SAM V5.0	1412	NCR	NCR
Dipole, 1900 MHz	D1900V2	5d251	2023/3/27	2026/3/26
Simulated Tissue Liquid Head(500-9500 MHz)	HBBL600-10000V6	220420-2	Each Time	/
Network Analyzer	8753B	2828A00170	2022/10/24	2023/10/23
Dielectric assessment kit	1319	SM DAK 040 CA	NCR	NCR
MXG Vector Signal Generator	N5182B	MY51350144	2023/3/31	2024/3/30
Power Meter	EPM-441A/8484A	GB37481494	2023/3/31	2024/3/30
USB Wideband Power Sensor	U2021XA	MY54080015	2023/3/31	2024/3/30
Power Amplifier	ZVE-6W-83+	637202210	NCR	NCR
Directional Coupler	441493	520Z	NCR	NCR
Attenuator	20dB, 100W	LN749	NCR	NCR
Attenuator	6dB, 150W	2754	NCR	NCR
Spectrum Analyzer	FSU26	200120	2023/4/18	2024/4/17
Digital Radio communication Tester	CMD 60M	846956/010	2023/3/31	2024/3/30
Thermometer	DTM3000	3892	2023/3/31	2024/3/30

4. SAR MEASUREMENT SYSTEM VERIFICATION

4.1 Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency (MHz)	Liquid Type	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$ (S/m)	
1900	Simulated Tissue Liquid Head	41.236	1.408	40.00	1.40	3.09	0.57	± 5
1924.99	Simulated Tissue Liquid Head	40.294	1.433	40.00	1.40	0.73	2.36	± 5

*Liquid Verification above was performed on 2023/10/12.

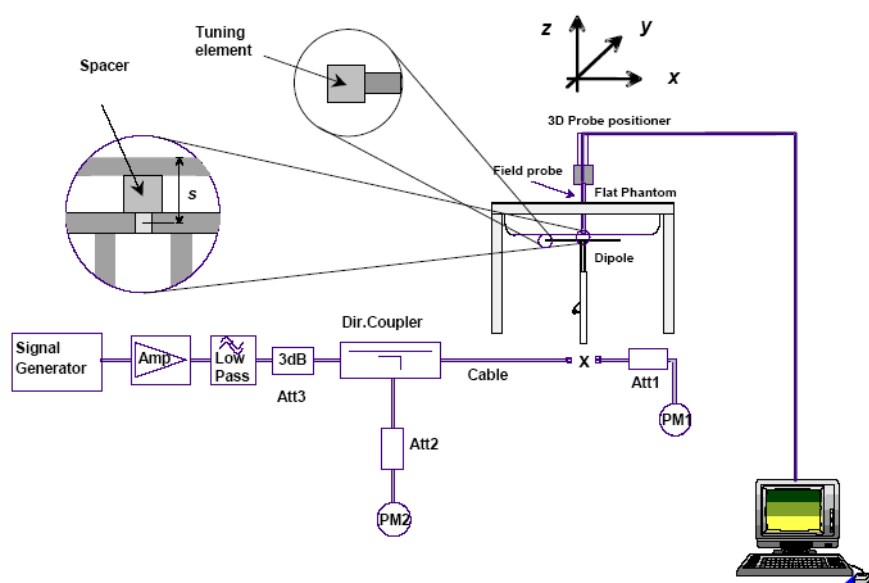
4.2 System Accuracy Verification

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

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

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

System Verification Setup Block Diagram



System Accuracy Check Results

Date	Frequency Band	Liquid Type	Input Power (mW)	Measured SAR (W/kg)	Normalized to 1W (W/kg)	Target Value (W/kg)	Delta (%)	Tolerance (%)
2023/10/12	1900 MHz	Simulated Tissue Liquid Head	100	1g 4.14	41.4	38.9	6.43	± 10

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

4.3 SAR SYSTEM VALIDATION DATA

System Performance 1900MHz Head

DUT: D1900V2; Type: 1900 MHz; Serial: 5d251

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

Medium parameters used: $f = 1900$ MHz; $\sigma = 1.408$ S/m; $\epsilon_r = 41.236$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1900 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Area Scan (7x8x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 6.08 W/kg

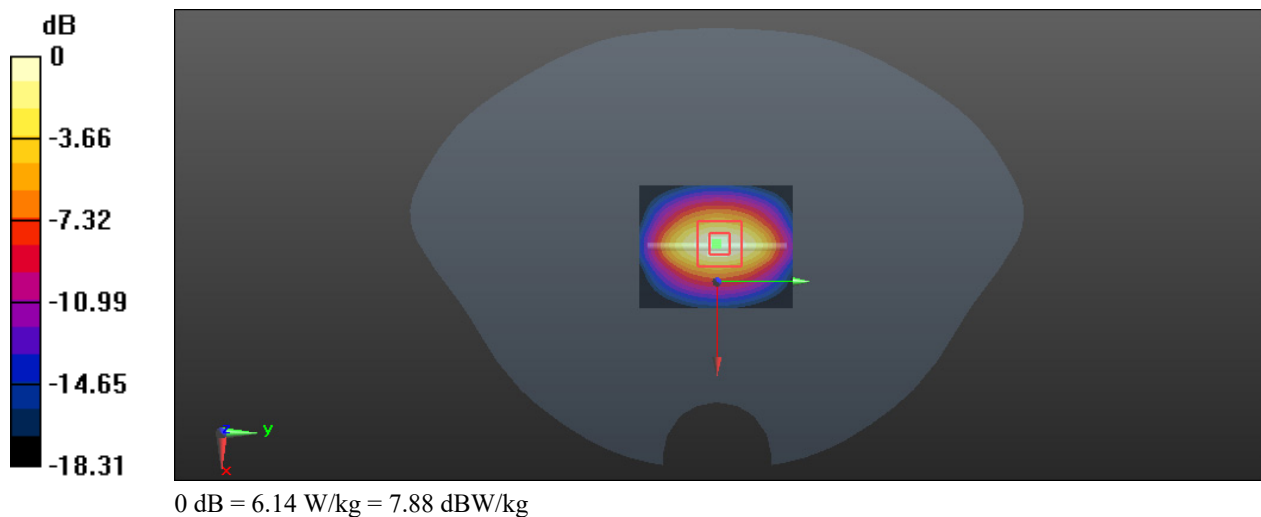
Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 45.24 V/m; Power Drift = 0.15 dB

Peak SAR (extrapolated) = 6.83 W/kg

SAR(1 g) = 4.14 W/kg; SAR(10 g) = 2.18 W/kg

Maximum value of SAR (measured) = 6.14 W/kg

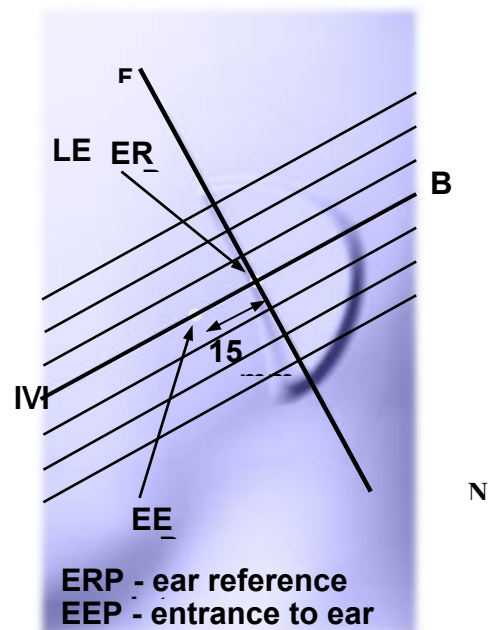
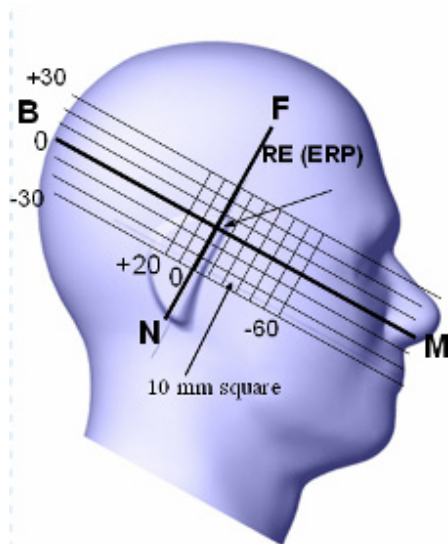


5. EUT TEST STRATEGY AND METHODOLOGY

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

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

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



5.2 Cheek/Touch Position

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

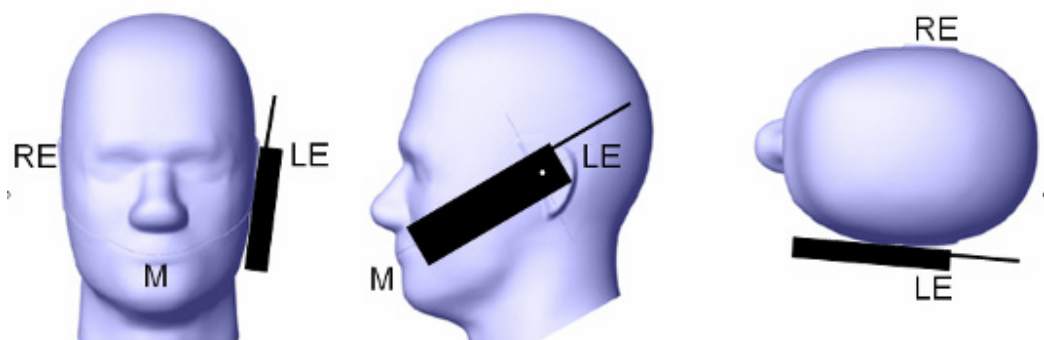
This test position is established:

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

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

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

Cheek /Touch Position



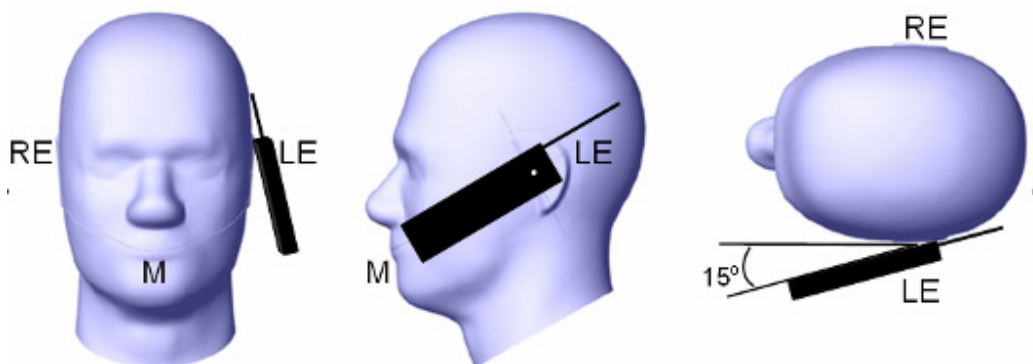
5.3 Ear/Tilt Position

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

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

If a device is also designed to transmit with its keypad cover closed for operating in the head position, such positions should also be considered in the SAR evaluation. The device should be tested on the left and right side of the head phantom in the “Cheek/Touch” and “Ear/Tilt” positions. When applicable, each configuration should be tested with the antenna in its fully extended and fully retracted positions. These test configurations should be tested at the high, middle and low frequency channels of each operating mode; for example, AMPS, CDMA, and TDMA. If the SAR measured at the middle channel for each test configuration (left, right, Cheek/Touch, Tilt/Ear, extended and retracted) is at least 2.0 dB lower than the SAR limit, testing at the high and low channels is optional for such test configuration(s). If the transmission band of the test device is less than 10 MHz, testing at the high and low frequency channels is optional.

Ear /Tilt 15° Position



5.4 Test positions for body-worn and other configurations

Body-worn operating configurations should be tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in normal use configurations. Devices with a headset output should be tested with a headset connected to the device. When multiple accessories that do not contain metallic components are supplied with the device, the device may be tested with only the accessory that dictates the closest spacing to the body. When multiple accessories that contain metallic components are supplied with the device, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component (e.g., the same metallic belt-clip used with different holsters with no other metallic components), only the accessory that dictates the closest spacing to the body must be tested.

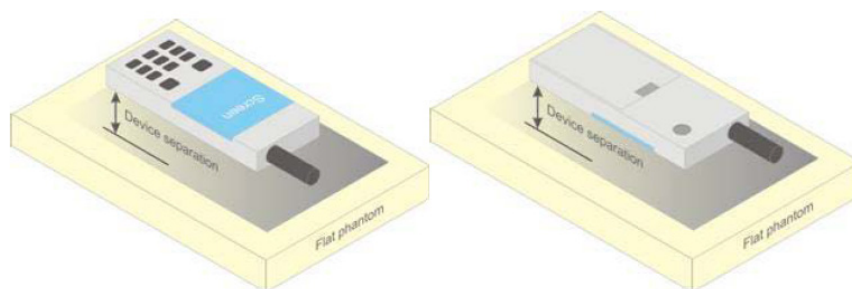


Figure 5 – Test positions for body-worn devices

5.5 Test Distance for SAR Evaluation

In this case the EUT (Equipment Under Test) is set directly against the phantom, the test distance is 0 mm.

5.6 SAR Evaluation Procedure

The evaluation was performed with the following procedure:

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

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

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

- 1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.
- 2) The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the "Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the averages.

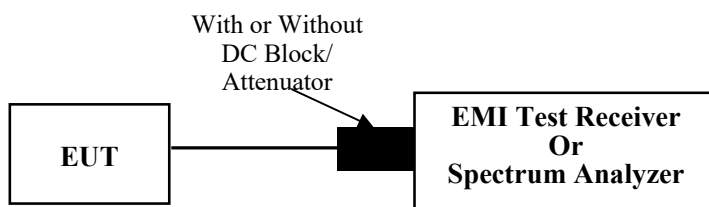
All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

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

6. CONDUCTED OUTPUT POWER MEASUREMENT

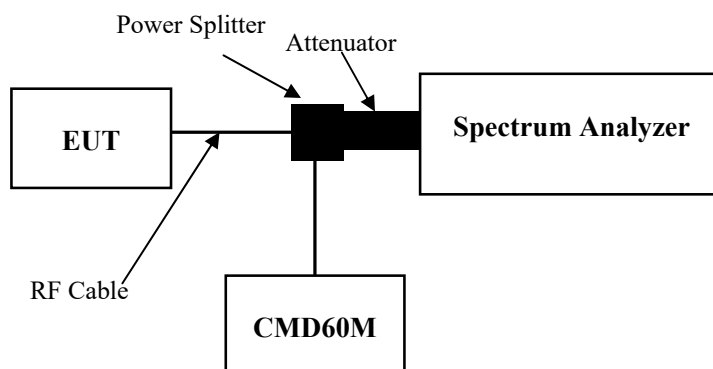
6.1 Test Procedure

The RF output of the transmitter was connected to the input port of the EMI Test Receiver or Spectrum Analyzer through Connector.



Bluetooth

The RF output of the transmitter was connected to the input of the Digital Radio Communication Tester.



DECT

6.2 Maximum Target Output Power

Max Target Power(dBm)			
Mode/Band	Channel		
	Low	Middle	High
DECT	20.7	20.7	20.7
Bluetooth BDR	4.0	5.0	6.0
Bluetooth EDR	6.0	7.0	8.0

6.3 Test Results:

DECT:

Mode	Frequency (MHz)	RF Output Peak Power (dBm)
DECT	1921.536	20.52
	1924.992	20.52
	1928.448	20.35

Bluetooth:

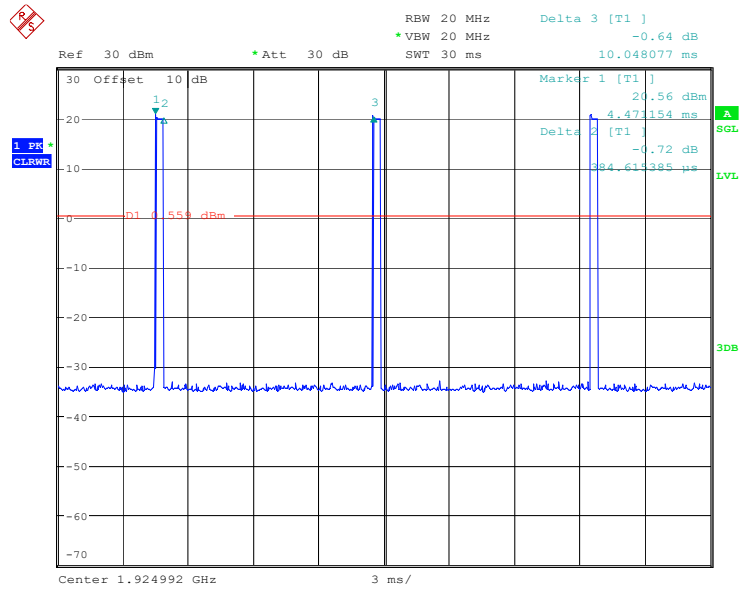
Mode	Channel frequency (MHz)	RF Output Power (dBm)
BDR (GFSK)	2402	2.93
	2441	4.28
	2480	5.43
EDR ($\pi/4$ -DQPSK)	2402	5.00
	2441	6.27
	2480	7.22
EDR (8DPSK)	2402	5.44
	2441	6.80
	2480	7.76

Note:

1. Rohde & Schwarz Radio Communication Tester (CMD60) was used for the measurement of DECT peak output power.
2. The DECT and Bluetooth output peak power is from Radio report.
3. Duty Cycle=1:26.1(0.0383)
4. The EUT belongs to a low duty cycle device.
5. Per IEEE1528:2013, **1 Channel** shall be tested; the middle channel was selected to test:

$$N_c = \text{Round} \left\{ \left[100(f_{\text{high}} - f_{\text{low}}) / f_c \right]^{0.5} \times (f_c / 100)^{0.2} \right\},$$

where f_{high} is the highest frequency in the band and f_{low} is the lowest f_c is the center frequency in the band.

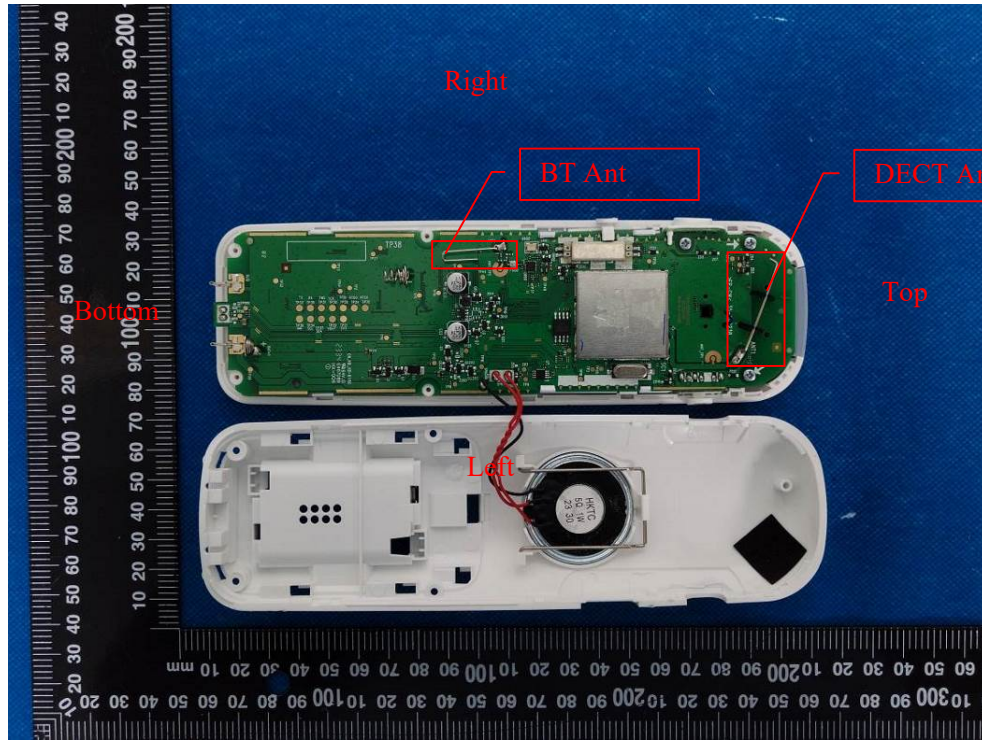


ProjectNo.:CR230956632 Tester:Rod Luo
Date: 9.OCT.2023 13:54:39

Duty Cycle

7. Standalone SAR test exclusion considerations

7.1 Antennas Location:



EUT Back View

7.2 Standalone SAR test exclusion considerations

Mode	Frequency (MHz)	Output Power (dBm)	Output Power (mW)	Distance (mm)	Calculated value	Threshold (1-g)	SAR Test Exclusion
DECT	1928.448	20.7	117.49	0	32.6	3	NO
Bluetooth	2480	8.0	6.31	0	2.0	3	YES

NOTE:

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

$$\left[\frac{(\text{max. power of channel, including tune-up tolerance, mW})}{(\text{min. test separation distance, mm})} \right] \cdot \sqrt{f(\text{GHz})} \leq 3.0$$
 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

1. $f(\text{GHz})$ is the RF channel transmit frequency in GHz.
2. Power and distance are rounded to the nearest mW and mm before calculation.
3. The result is rounded to one decimal place for comparison.
4. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test Exclusion.

8. SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

8.1 SAR Test Data

Environmental Conditions

Temperature:	23.1~23.9℃
Relative Humidity:	36~44 %
ATM Pressure:	101.3 kPa
Test Date:	2023/10/12

Testing was performed by Ken Zong.

DECT Mode:

EUT Position	Frequency (MHz)	Test Mode	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/kg)			
					Scaled Factor	Meas. SAR	Scaled SAR	Plot
Head Left Cheek	1921.536	GFSK	/	/	/	/	/	/
	1924.992	GFSK	20.52	20.7	1.042	0.032	0.04	1#
	1928.448	GFSK	/	/	/	/	/	/
Head Left Tilt	1921.536	GFSK	/	/	/	/	/	/
	1924.992	GFSK	20.52	20.7	1.042	0.024	0.03	2#
	1928.448	GFSK	/	/	/	/	/	/
Head Right Cheek	1921.536	GFSK	/	/	/	/	/	/
	1924.992	GFSK	20.52	20.7	1.042	0.038	0.04	3#
	1928.448	GFSK	/	/	/	/	/	/
Head Right Tilt	1921.536	GFSK	/	/	/	/	/	/
	1924.992	GFSK	20.52	20.7	1.042	0.024	0.03	4#
	1928.448	GFSK	/	/	/	/	/	/
Body Back (0 mm)	1921.536	GFSK	/	/	/	/	/	/
	1924.992	GFSK	20.52	20.7	1.042	0.102	0.11	5#
	1928.448	GFSK	/	/	/	/	/	/

Note:

1. When the 1-g SAR is $\leq 0.8\text{W/Kg}$, testing for other channels are optional.
2. When SAR or MPE is not measured at the maximum power level allowed for production to the individual channels tested to determine compliance.

9. Measurement Variability

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

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 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 .

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

The Highest Measured SAR Configuration in Each Frequency Band

Head

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

Body

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

Note:

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

10. SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

The device does not have simultaneous transmission capability.

11. SAR Plots

Plot: 1#

DUT: Cordless handset; Type: SN5127; Serial: 2BPS-8

Communication System: UID 0, DECT (0); Frequency: 1924.99 MHz; Duty Cycle: 1:26.1

Medium parameters used: $f = 1924.99$ MHz; $\sigma = 1.433$ S/m; $\epsilon_r = 40.294$; $\rho = 1000$ kg/m³

Phantom section: Left Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1924.99 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Head Left Cheek/DECT Mid/Area Scan (8x10x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.0416 W/kg

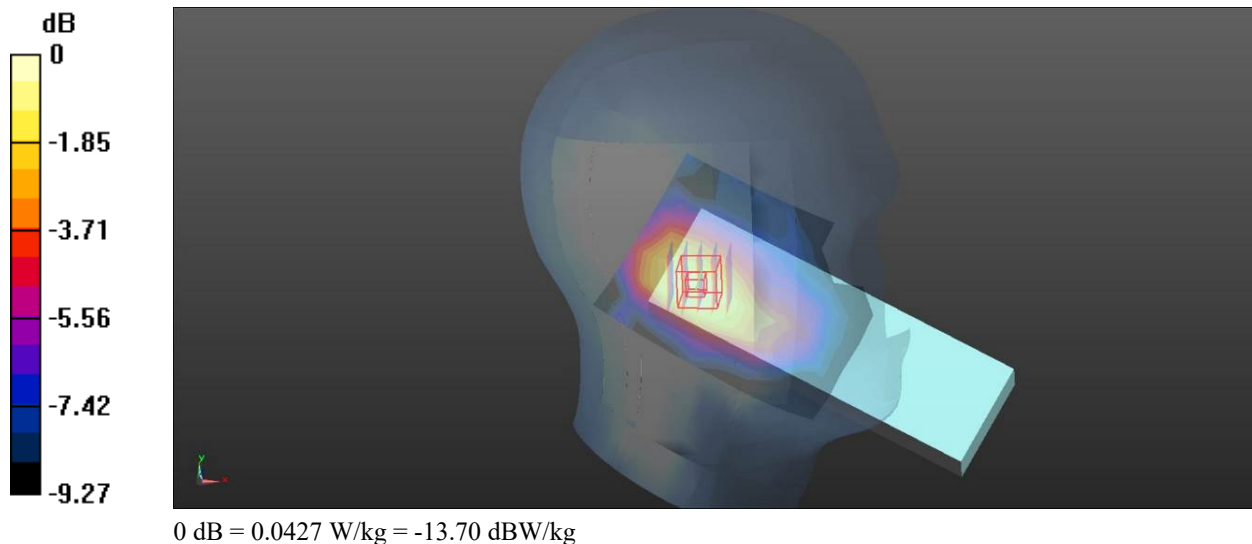
Head Left Cheek/DECT Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.727 V/m; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 0.0480 W/kg

SAR(1 g) = 0.032 W/kg; SAR(10 g) = 0.022 W/kg

Maximum value of SAR (measured) = 0.0427 W/kg



Plot: 2#**DUT: Cordless handset; Type: SN5127; Serial: 2BPS-8**

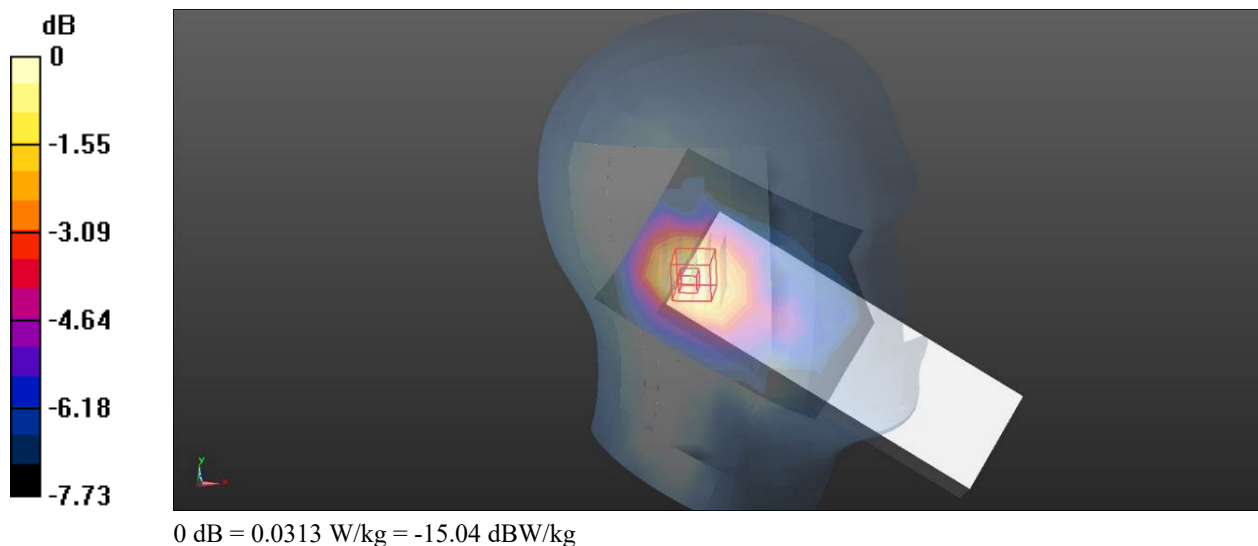
Communication System: UID 0, DECT (0); Frequency: 1924.99 MHz; Duty Cycle: 1:26.1
Medium parameters used: $f = 1924.99$ MHz; $\sigma = 1.433$ S/m; $\epsilon_r = 40.294$; $\rho = 1000$ kg/m³
Phantom section: Left Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1924.99 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Head Left Tilt/DECT Mid/Area Scan (8x10x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 0.0298 W/kg

Head Left Tilt/DECT Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 3.721 V/m; Power Drift = 0.03 dB
Peak SAR (extrapolated) = 0.0360 W/kg
SAR(1 g) = 0.024 W/kg; SAR(10 g) = 0.016 W/kg
Maximum value of SAR (measured) = 0.0313 W/kg



Plot: 3#**DUT: Cordless handset; Type: SN5127; Serial: 2BPS-8**

Communication System: UID 0, DECT (0); Frequency: 1924.99 MHz; Duty Cycle: 1:26.1

Medium parameters used: $f = 1924.99$ MHz; $\sigma = 1.433$ S/m; $\epsilon_r = 40.294$; $\rho = 1000$ kg/m³

Phantom section: Right Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1924.99 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Head Right Cheek/DECT Mid/Area Scan (8x10x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.0463 W/kg

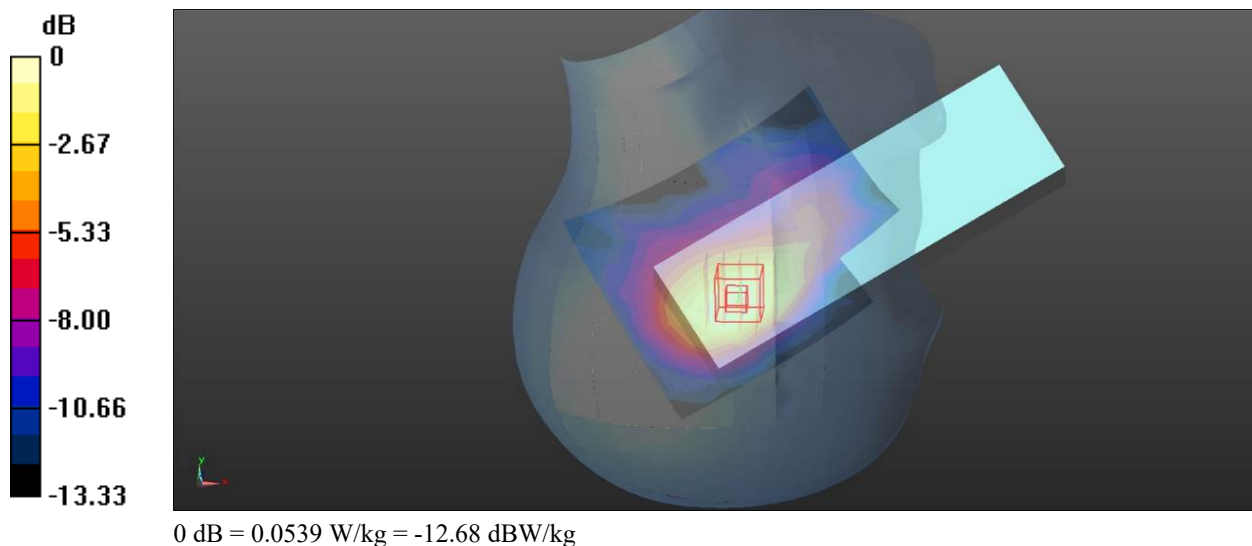
Head Right Cheek/DECT Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.743 V/m; Power Drift = -0.08 dB

Peak SAR (extrapolated) = 0.0630 W/kg

SAR(1 g) = 0.038 W/kg; SAR(10 g) = 0.023 W/kg

Maximum value of SAR (measured) = 0.0539 W/kg



Plot: 4#**DUT: Cordless handset; Type: SN5127; Serial: 2BPS-8**

Communication System: UID 0, DECT (0); Frequency: 1924.99 MHz; Duty Cycle: 1:26.1

Medium parameters used: $f = 1924.99$ MHz; $\sigma = 1.433$ S/m; $\epsilon_r = 40.294$; $\rho = 1000$ kg/m³

Phantom section: Right Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1924.99 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Head Right Tilt/DECT Mid/Area Scan (8x10x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.0309 W/kg

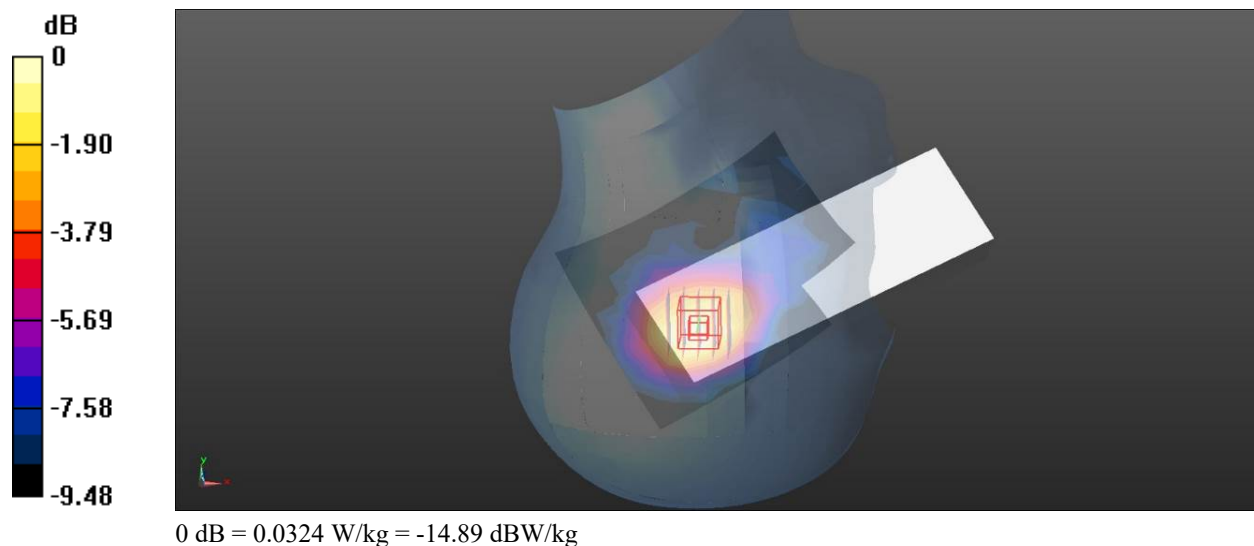
Head Right Tilt/DECT Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.404 V/m; Power Drift = -0.08 dB

Peak SAR (extrapolated) = 0.0380 W/kg

SAR(1 g) = 0.024 W/kg; SAR(10 g) = 0.016 W/kg

Maximum value of SAR (measured) = 0.0324 W/kg



Plot: 5#**DUT: Cordless handset; Type: SN5127; Serial: 2BPS-8**

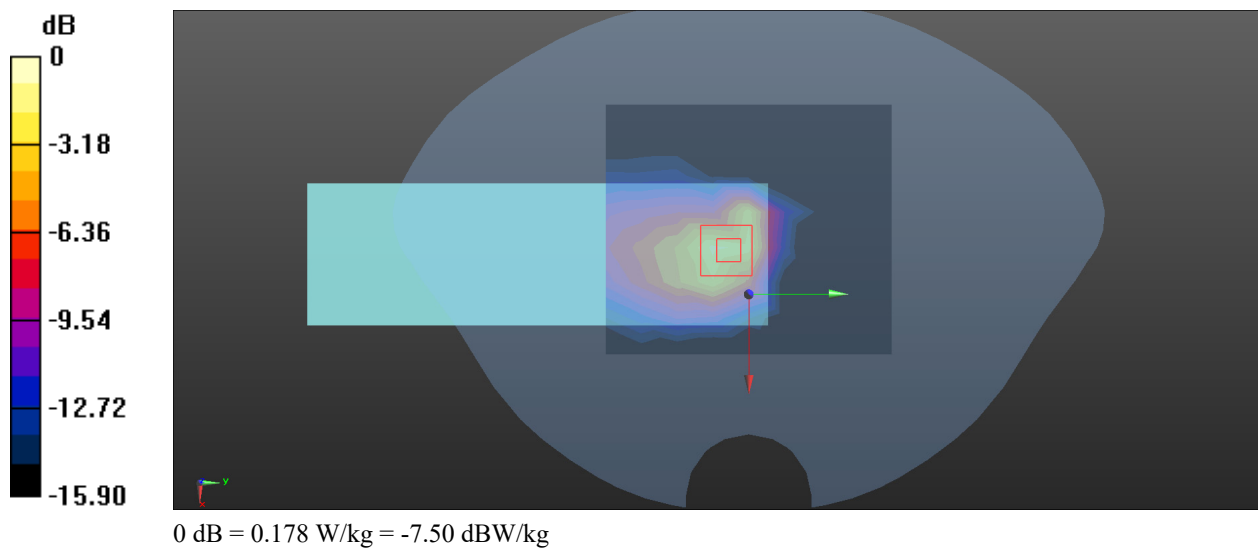
Communication System: UID 0, DECT (0); Frequency: 1924.99 MHz; Duty Cycle: 1:26.1
Medium parameters used: $f = 1924.99$ MHz; $\sigma = 1.433$ S/m; $\epsilon_r = 40.294$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(5.18, 5.18, 5.18) @ 1924.99 MHz;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Body Back/DECT Mid/Area Scan (8x9x1): Measurement grid: dx=15mm, dy=15mm
Maximum value of SAR (measured) = 0.119 W/kg

Body Back/DECT Mid/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm
Reference Value = 7.546 V/m; Power Drift = 0.11 dB
Peak SAR (extrapolated) = 0.223 W/kg
SAR(1 g) = 0.102 W/kg; SAR(10 g) = 0.050 W/kg
Maximum value of SAR (measured) = 0.178 W/kg



APPENDIX A MEASUREMENT UNCERTAINTY

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

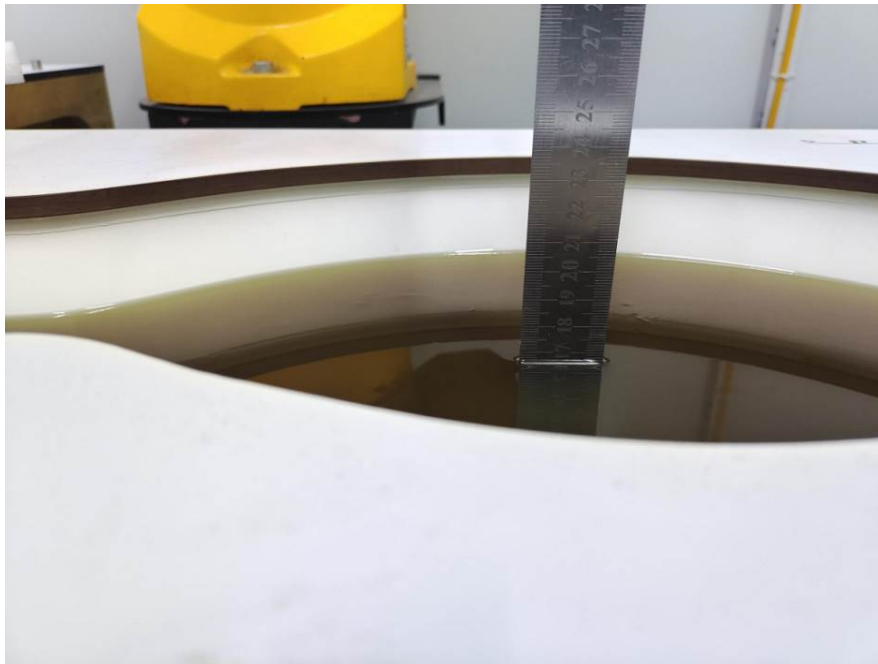
Measurement uncertainty evaluation for IEEE1528-2013 SAR test

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

APPENDIX B EUT TEST POSITION PHOTOS

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

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



Body Back Setup Photo (0 mm)



Head Left Cheek Setup Photo (0 mm)



Head Left Tilt Setup Photo (0 mm)



Head Right Cheek Setup Photo (0 mm)



Head Right Tilt Setup Photo (0 mm)



APPENDIX C PROBE CALIBRATION CERTIFICATES



Add: No.52 HuaYuanBei Road, Haidian District, Beijing, 100191, China
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CNAS L0570

Client **CCICT**Certificate No: **Z23-60188**

CALIBRATION CERTIFICATE

Object **ES3DV3 - SN : 3157**

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

Calibration date: **April 10, 2023**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
Power Meter NRP2	101919	14-Jun-22(CTTL, No.J22X04181)	Jun-23
Power sensor NRP-Z91	101547	14-Jun-22(CTTL, No.J22X04181)	Jun-23
Power sensor NRP-Z91	101548	14-Jun-22(CTTL, No.J22X04181)	Jun-23
Reference 10dBAttenuator	18N50W-10dB	19-Jan-23(CTTL, No.J23X00212)	Jan-25
Reference 20dBAttenuator	18N50W-20dB	19-Jan-23(CTTL, No.J23X00211)	Jan-25
Reference Probe EX3DV4	SN 3846	20-May-22(SPEAG, No.EX3-3846_May22)	May-23
DAE4	SN 1555	25-Aug-22(SPEAG, No.DAE4-1555_Aug22)	Aug-23
DAE4	SN 549	24-Jan-23(SPEAG, No.DAE4-549_Jan23)	Jan-24
Secondary Standards	ID #	Cal Date(Calibrated by, Certificate No.)	Scheduled Calibration
SignalGenerator MG3700A	6201052605	14-Jun-22(CTTL, No.J22X04182)	Jun-23
Network Analyzer E5071C	MY46110673	10-Jan-23(CTTL, No.J23X00104)	Jan-24

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

Issued: April 15, 2023

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Certificate No: Z23-60188

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**Glossary:**

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

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

Calibration is Performed According to the Following Standards:

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

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}: Assessed for E-field polarization $\theta=0$ ($f \leq 900\text{MHz}$ in TEM-cell; $f > 1800\text{MHz}$: waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not effect the E^2 -field uncertainty inside TSL (see below ConvF).
- NORM(f)_{x,y,z} = NORM_{x,y,z} * frequency_response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP_{x,y,z}: DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- PAR: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics.
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; VR_{x,y,z}; A,B,C are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800\text{MHz}$) and inside waveguide using analytical field distributions based on power measurements for $f > 800\text{MHz}$. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty valued are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from $\pm 50\text{MHz}$ to $\pm 100\text{MHz}$.
- Spherical isotropy (3D deviation from isotropy): in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle: The angle is assessed using the information gained by determining the NORM_x (no uncertainty required).



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DASY/EASY – Parameters of Probe: ES3DV3 – SN:3157

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc ($k=2$)
Norm($\mu V/(V/m)^2$) ^A	0.97	1.14	0.96	$\pm 10.0\%$
DCP(mV) ^B	102.2	102.6	103.6	

Modulation Calibration Parameters

UID	Communication System Name		A dB	B dB $\sqrt{\mu V}$	C	D dB	VR mV	Unc ^E ($k=2$)
0	CW	X	0.0	0.0	1.0	0.00	224.4	$\pm 2.0\%$
		Y	0.0	0.0	1.0		247.0	
		Z	0.0	0.0	1.0		223.9	

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

^A The uncertainties of Norm X, Y, Z do not affect the E²-field uncertainty inside TSL (see Page 4).

^B Numerical linearization parameter: uncertainty not required.

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



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DASY/EASY – Parameters of Probe: ES3DV3 – SN:3157

Calibration Parameter Determined in Head Tissue Simulating Media

f [MHz] ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unct. (k=2)
750	41.9	0.89	6.48	6.48	6.48	0.35	1.53	± 12.7%
900	41.5	0.97	6.25	6.25	6.25	0.37	1.53	± 12.7%
1750	40.1	1.37	5.38	5.38	5.38	0.60	1.31	± 12.7%
1900	40.0	1.40	5.18	5.18	5.18	0.65	1.26	± 12.7%
2300	39.5	1.67	4.96	4.96	4.96	0.90	1.10	± 12.7%
2450	39.2	1.80	4.74	4.74	4.74	0.90	1.10	± 12.7%
2600	39.0	1.96	4.52	4.52	4.52	0.90	1.16	± 12.7%

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

^F At frequency up to 6 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ±10% if liquid compensation formula is applied to measured SAR values. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

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



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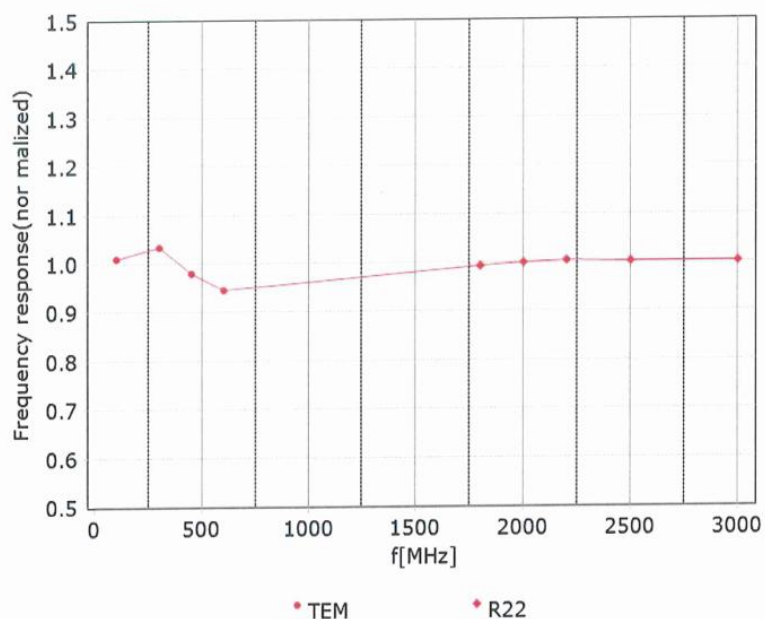
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Frequency Response of E-Field (TEM-Cell: ifi110 EXX, Waveguide: R22)

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

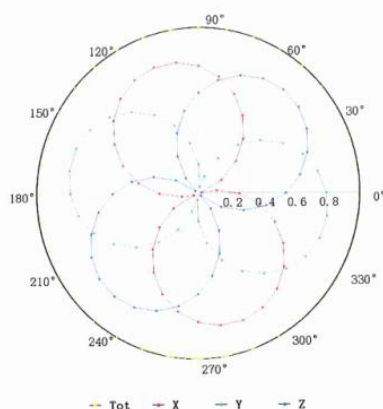


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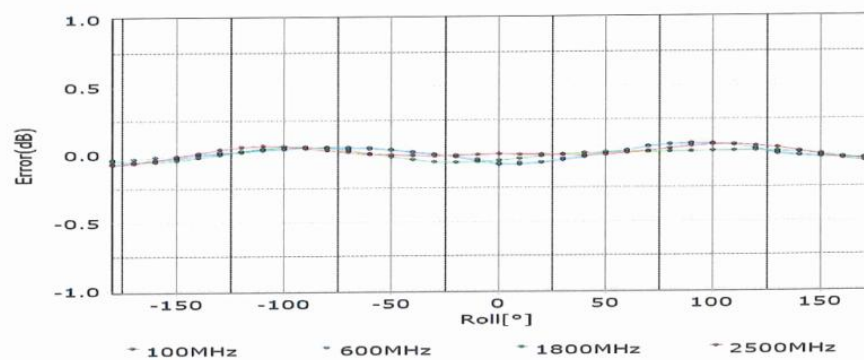
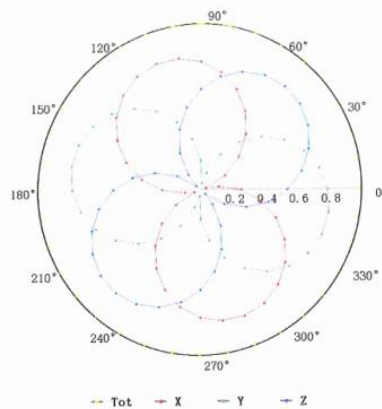


Receiving Pattern (Φ), $\theta=0^\circ$

f=600 MHz, TEM



f=1800 MHz, R22



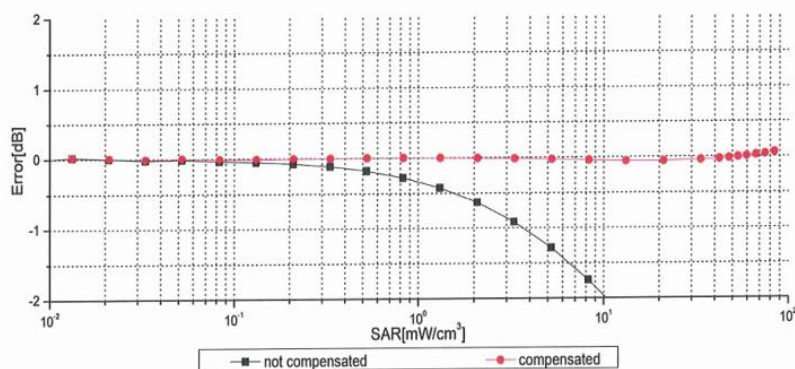
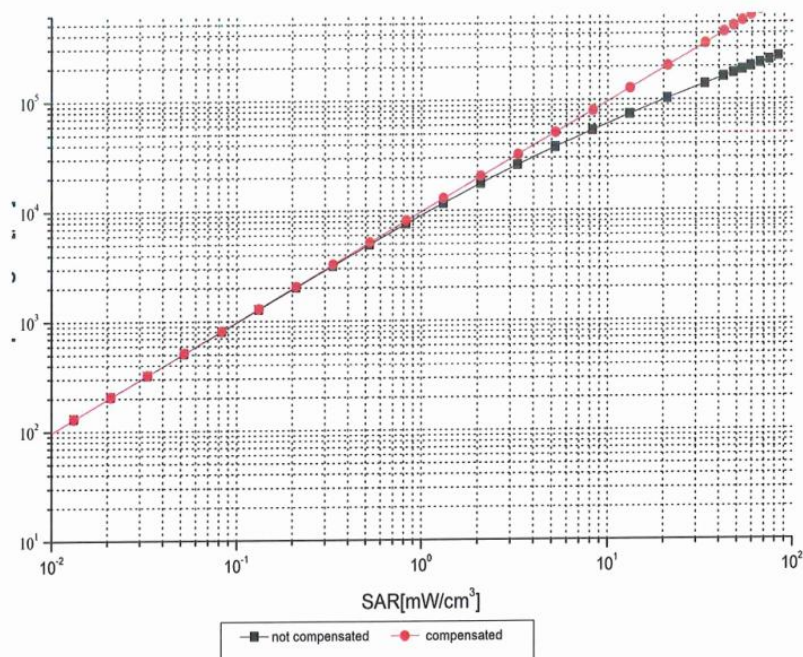
Uncertainty of Axial Isotropy Assessment: $\pm 1.2\%$ ($k=2$)



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



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



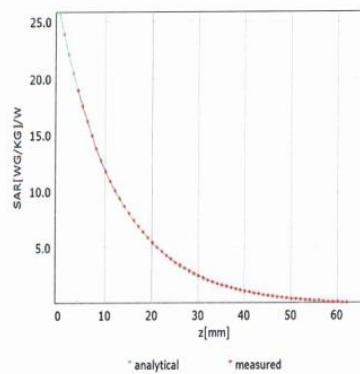
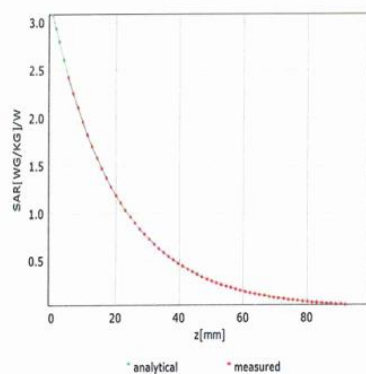
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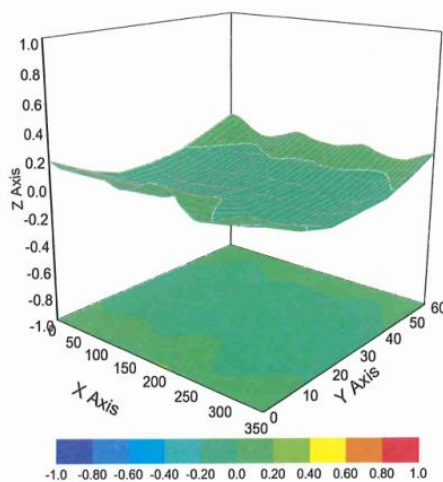
Conversion Factor Assessment

f=750 MHz,WGLS R9(H_convF)

f=1750 MHz,WGLS R22(H_convF)



Deviation from Isotropy in Liquid



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



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DASY/EASY – Parameters of Probe: ES3DV3 – SN:3157**Other Probe Parameters**

Sensor Arrangement	Triangular
Connector Angle (°)	56.2
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disable
Probe Overall Length	337mm
Probe Body Diameter	10mm
Tip Length	10mm
Tip Diameter	4mm
Probe Tip to Sensor X Calibration Point	2mm
Probe Tip to Sensor Y Calibration Point	2mm
Probe Tip to Sensor Z Calibration Point	2mm
Recommended Measurement Distance from Surface	3mm

APPENDIX D DIPOLE CALIBRATION CERTIFICATES

**Calibration Laboratory of
Schmid & Partner
Engineering AG**
Zeughausstrasse 43, 8004 Zurich, Switzerland



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C Service suisse d'étalonnage
S Servizio svizzero di taratura
S Swiss Calibration Service

Accreditation No.: **SCS 0108**

Accredited by the Swiss Accreditation Service (SAS)
The Swiss Accreditation Service is one of the signatories to the EA
Multilateral Agreement for the recognition of calibration certificates

Client **BACL**
Sunnyvale, USA

Certificate No. **D1900V2-5d251_Mar23**

CALIBRATION CERTIFICATE

Object **D1900V2 - SN:5d251**

Calibration procedure(s) **QA CAL-05.v12**
Calibration Procedure for SAR Validation Sources between 0.7-3 GHz

Calibration date: **March 27, 2023**

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

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

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID #	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-22 (No. 217-03525/03524)	Apr-23
Power sensor NRP-Z91	SN: 103244	04-Apr-22 (No. 217-03524)	Apr-23
Power sensor NRP-Z91	SN: 103245	04-Apr-22 (No. 217-03525)	Apr-23
Reference 20 dB Attenuator	SN: BH9394 (20k)	04-Apr-22 (No. 217-03527)	Apr-23
Type-N mismatch combination	SN: 310982 / 06327	04-Apr-22 (No. 217-03528)	Apr-23
Reference Probe EX3DV4	SN: 7349	10-Jan-23 (No. EX3-7349_Jan23)	Jan-24
DAE4	SN: 601	19-Dec-22 (No. DAE4-601_Dec22)	Dec-23

Secondary Standards	ID #	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB39512475	30-Oct-14 (in house check Oct-22)	In house check: Oct-24
Power sensor HP 8481A	SN: US37292783	07-Oct-15 (in house check Oct-22)	In house check: Oct-24
Power sensor HP 8481A	SN: MY41093315	07-Oct-15 (in house check Oct-22)	In house check: Oct-24
RF generator R&S SMT-06	SN: 100972	15-Jun-15 (in house check Oct-22)	In house check: Oct-24
Network Analyzer Agilent E8358A	SN: US41080477	31-Mar-14 (in house check Oct-22)	In house check: Oct-24

Calibrated by: **Jeton Kastrati** Name
Function **Laboratory Technician**

Approved by: **Sven Kühn** Name
Function **Technical Manager**

Signature

Issued: March 27, 2023

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Certificate No: D1900V2-5d251_Mar23

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Accreditation No.: **SCS 0108**

Glossary:

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

Calibration is Performed According to the Following Standards:

- a) IEC/IEEE 62209-1528, "Measurement Procedure For The Assessment Of Specific Absorption Rate Of Human Exposure To Radio Frequency Fields From Hand-Held And Body-Worn Wireless Communication Devices - Part 1528: Human Models, Instrumentation And Procedures (Frequency Range of 4 MHz to 10 GHz)", October 2020.
- b) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Additional Documentation:

- c) DASY System Handbook

Methods Applied and Interpretation of Parameters:

- *Measurement Conditions:* Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- *Antenna Parameters with TSL:* The source is mounted in a touch configuration below the center marking of the flat phantom.
- *Return Loss:* This parameter is measured with the source positioned under the liquid filled phantom (as described in the measurement condition clause). The Return Loss ensures low reflected power. No uncertainty required.
- *SAR measured:* SAR measured at the stated antenna input power.
- *SAR normalized:* SAR as measured, normalized to an input power of 1 W at the antenna connector.
- *SAR for nominal TSL parameters:* The measured TSL parameters are used to calculate the nominal SAR result.

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

Measurement Conditions

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

DASY Version	DASY52	V52.10.4
Extrapolation	Advanced Extrapolation	
Phantom	Modular Flat Phantom	
Distance Dipole Center - TSL	10 mm	with Spacer
Zoom Scan Resolution	dx, dy, dz = 5 mm	
Frequency	1900 MHz \pm 1 MHz	

Head TSL parameters

The following parameters and calculations were applied.

	Temperature	Permittivity	Conductivity
Nominal Head TSL parameters	22.0 °C	40.0	1.40 mho/m
Measured Head TSL parameters	(22.0 \pm 0.2) °C	39.0 \pm 6 %	1.36 mho/m \pm 6 %
Head TSL temperature change during test	< 0.5 °C	----	----

SAR result with Head TSL

SAR averaged over 1 cm³ (1 g) of Head TSL	Condition	
SAR measured	250 mW input power	9.61 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	38.9 W/kg \pm 17.0 % (k=2)

SAR averaged over 10 cm³ (10 g) of Head TSL	condition	
SAR measured	250 mW input power	5.04 W/kg
SAR for nominal Head TSL parameters	normalized to 1W	20.3 W/kg \pm 16.5 % (k=2)

Appendix (Additional assessments outside the scope of SCS 0108)**Antenna Parameters with Head TSL**

Impedance, transformed to feed point	$49.5 \Omega + 6.5 j\Omega$
Return Loss	- 23.7 dB

General Antenna Parameters and Design

Electrical Delay (one direction)	1.191 ns
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After long term use with 100W radiated power, only a slight warming of the dipole near the feedpoint can be measured.

The dipole is made of standard semirigid coaxial cable. The center conductor of the feeding line is directly connected to the second arm of the dipole. The antenna is therefore short-circuited for DC-signals. On some of the dipoles, small end caps are added to the dipole arms in order to improve matching when loaded according to the position as explained in the "Measurement Conditions" paragraph. The SAR data are not affected by this change. The overall dipole length is still according to the Standard.

No excessive force must be applied to the dipole arms, because they might bend or the soldered connections near the feedpoint may be damaged.

Additional EUT Data

Manufactured by	SPEAG
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DASY5 Validation Report for Head TSL

Date: 27.03.2023

Test Laboratory: SPEAG, Zurich, Switzerland

DUT: Dipole 1900 MHz; Type: D1900V2; Serial: D1900V2 - SN:5d251

Communication System: UID 0 - CW; Frequency: 1900 MHz

Medium parameters used: $f = 1900$ MHz; $\sigma = 1.36$ S/m; $\epsilon_r = 39$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2011)

DASY52 Configuration:

- Probe: EX3DV4 - SN7349; ConvF(8.35, 8.35, 8.35) @ 1900 MHz; Calibrated: 10.01.2023
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn601; Calibrated: 19.12.2022
- Phantom: Flat Phantom 5.0 (front); Type: QD 000 P50 AA; Serial: 1001
- DASY52 52.10.4(1535); SEMCAD X 14.6.14(7501)

Dipole Calibration for Head Tissue/Pin=250 mW, d=10mm/Zoom Scan (7x7x7)/Cube 0:

Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 108.9 V/m; Power Drift = -0.01 dB

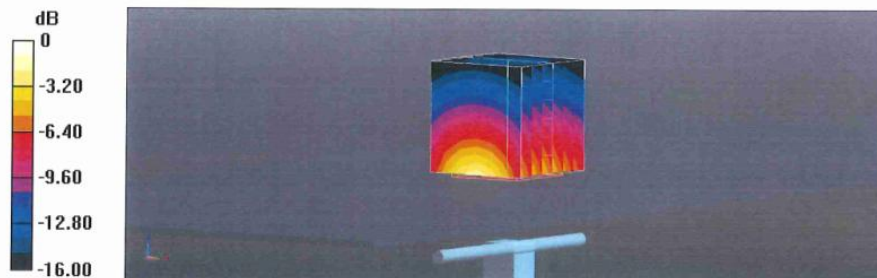
Peak SAR (extrapolated) = 17.4 W/kg

SAR(1 g) = 9.61 W/kg; SAR(10 g) = 5.04 W/kg

Smallest distance from peaks to all points 3 dB below = 10 mm

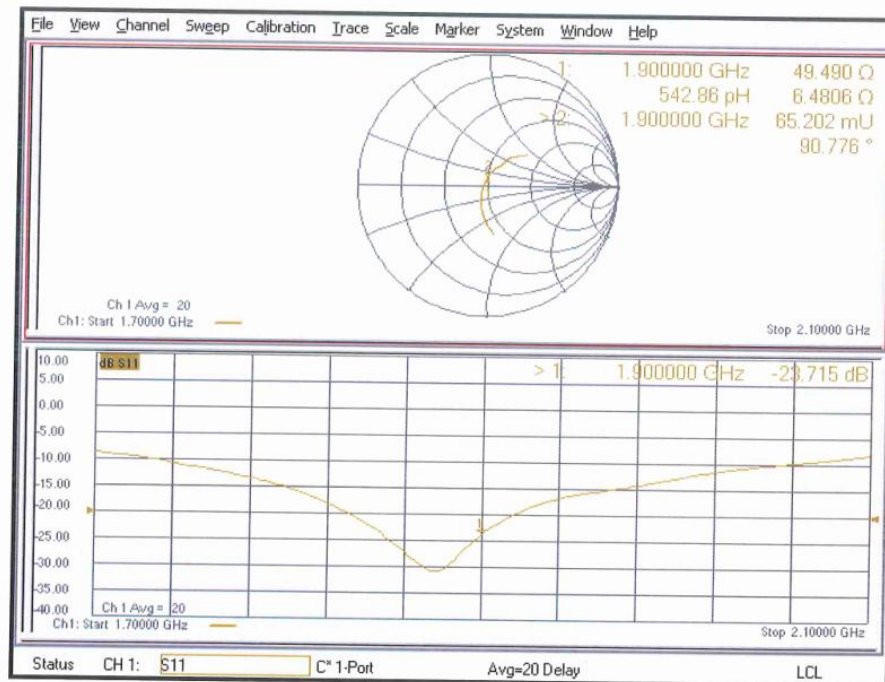
Ratio of SAR at M2 to SAR at M1 = 55.4%

Maximum value of SAR (measured) = 14.8 W/kg



0 dB = 14.8 W/kg = 11.70 dBW/kg

Impedance Measurement Plot for Head TSL



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