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# FCC SAR EVALUATION REPORT

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

Product Name :SMART PHOTO FRAMETrademark :BYYBUOModel Name :D10Family Model :D20,D30,DF101Report No. :STR220104001003EFCC ID :2AXUI-D10

#### **Prepared for**

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Report No.: STR220104001003E

### **TEST RESULT CERTIFICATION**

Applicant's name: CHITECH SHENZHEN TECHNOLOGY CO., LTD					
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Address	101,NO.48,Xiashijia Road,Gongming Town,Guangming				
Address	Dist.,Shenzhen,China				
Product description					
Product name	: SMART PHOTO FRAME				
Trademark	: BYYBUO				
Model Name	: D10				
Family Model	: D20,D30,DF101				
Ctondordo	ANSI/IEEE C95.1-1992				
วเล่าเนลี่ในร	IEEE Std 1528-2013				
	Published RF exposure KDB procedures				

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

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#### Date of Test

Test Result:	Pass
Date of Issue:	Feb. 17, 2022
Date (s) of performance of tests:	Jan. 13, 2022

Prepared By (Test Engineer)

 $\int_{\alpha} cob$  . Chen (Jacob Chen)

Approved By (Lab Manager)

(Alex Li)



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Report No.: STR220104001003E

## **\*\* \*\* Revision History \*\***

REV.	DESCRIPTION	ISSUED DATE	REMARK
Rev.1.0	Initial Test Report Release	Feb. 17, 2022	Jacob Chen





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## 1. General Information

#### 1.1. RF exposure limits

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

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

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

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

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

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

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

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

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

NOTE TRUNK LIMIT 1.6 W/kg APPLIED TO THIS EUT

#### 

#### 1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for D10 are as follows.

	Max Reported SAR Value(W/kg)	
Band	1-g Body	
	(Separation distance of 0mm)	
WLAN 2.4G	0.785	

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

#### 1.3. EUT Description

Device Information						
Product Name	SMART PHOTO FRAME					
Trade Name	BYYBUO					
Model Name	D10					
Family Model	D20,D30,DF101					
FCC ID	2AXUI-D10					
Device Phase	Identical Prototype					
Exposure Category	General population / Uncontro	lled environment				
Antenna	FPC Antenna					
Battery Information	N/A					
Hardware version:	R100-MB					
Software version	N/A					
Device Operating Configura	tions					
Supporting Mode(s)	WLAN 2.4G					
Test Modulation	WLAN(DSSS/OFDM)					
Device Class	В					
Operating Frequency	Band Tx (MHz) Rx (MHz)					
Range(s)	WLAN 2.4G 2412-2462					

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#### 1.4. Test specification(s)

FCC 47 CFR Part 2(2.1093)

ANSI/IEEE C95.1-1992

IEEE Std 1528-2013

KDB 865664 D01 SAR measurement 100 MHz to 6 GHz

KDB 865664 D02 RF Exposure Reporting

KDB 447498 D01 General RF Exposure Guidance

KDB 248227 D01 802.11 Wi-Fi SAR

KDB 616217 D04 SAR for laptop and tablets

#### 1.5. Ambient Condition

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

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### 2. SAR Measurement System

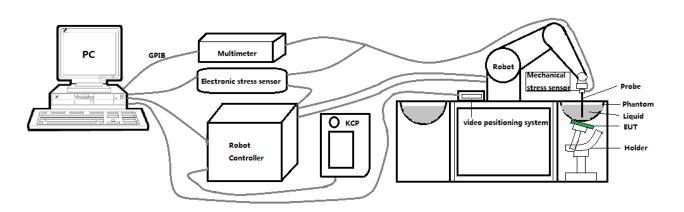
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#### 2.1. SATIMO SAR Measurement Set-up Diagram

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

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

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



#### 2.2. Robot

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



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



#### 2.3. E-Field Probe

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

For the measurements the Specific Dosimetric E-Field Probe SN 08/16 EPGO287 with following specifications is used



- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 2.5 mm
- Distance between probe tip and sensor center: 1 mm

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

- Probe linearity: ±0.08 dB
- Axial isotropy: ±0.01 dB
- Hemispherical Isotropy: ±0.01 dB
- Calibration range: 650MHz to 5900MHz for head & body simulating liquid.
- Lower detection limit: 8mW/kg

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

#### 2.3.1. E-Field Probe Calibration

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





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#### 2.4. SAM phantoms

#### Photo of SAM phantom SN 16/15 SAM119



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

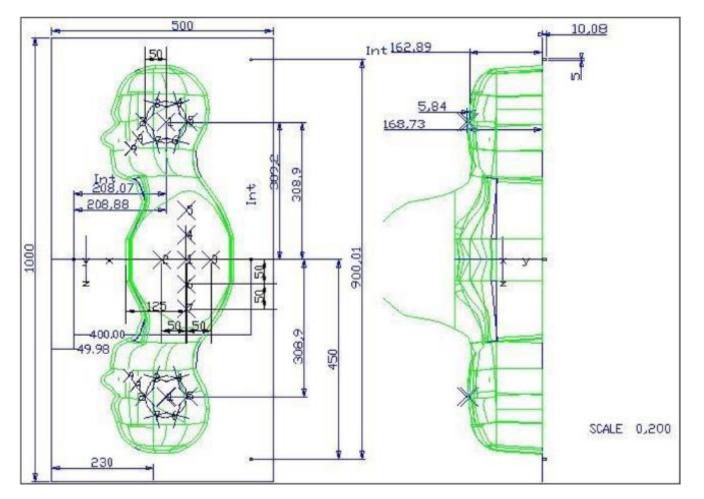




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#### 2.4.1. Technical Data

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



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

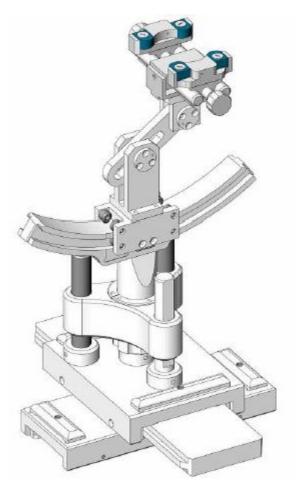
The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10 µm.



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#### 2.5. Device Holder

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



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

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#### 2.6. Test Equipment List

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

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

	Manufacturor	Name of		Serial Number	Calib	ration
	Manufacturer	Equipment	Type/Model	Senar Number	Last Cal.	Due Date
$\boxtimes$	MVG	E FIELD PROBE	SSE2	SN 08/16 EPGO287	Mar. 01,	Feb. 28,
	IVI V G		33EZ	SN 00/10 EFG0207	2021	2022
	MVG	750 MHz Dipole	SID750	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NV G		310750	0G750-355	2021	2024
	MVG	835 MHz Dipole	SID835	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NV G		310033	0G835-347	2021	2024
	MVG	900 MHz Dipole	SID900	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NV G		310900	0G900-348	2021	2024
	MVG	1800 MHz Dipole	SID1800	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NV G		3101000	1G800-349	2021	2024
	MVG	1900 MHz Dipole	SID1900	SN 03/15 DIP	Mar. 01,	Feb. 28,
	IVI V G		3101900	1G900-350	2021	2024
	MVG	2000 MHz Dipole	SID2000	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NV G		3102000	2G000-351	2021	2024
$\boxtimes$	MVG	2450 MHz Dipole	SID2450	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NIV G		5ID2450	2G450-352	2021	2024
	MVG	2600 MHz Dipole	SID2600	SN 03/15 DIP	Mar. 01,	Feb. 28,
	NIV G		5102000	2G600-356	2021	2024
	MVG	5000 MHz Dipole	SWG5500	SN 13/14 WGA 33	Mar. 01,	Feb. 28,
	NIV G		30000	SN 13/14 WGA 33	2021	2024
$\boxtimes$	MVG	Liquid measurement Kit	SCLMP	SN 21/15 OCPG 72	NCR	NCR
$\square$	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
$\boxtimes$	KEITHLEY	Millivoltmeter	2000	4072790	NCR	NCR
	R&S	Universal radio communication tester	CMU200	117858	Jul. 01, 2021	Jun. 30, 2022
	R&S	Wideband radio communication tester	CMW500	103917	Jul. 01, 2021	Jun. 30, 2022
	HP	Network Analyzer	8753D	3410J01136	Jul. 01, 2021	Jun. 30, 2022
$\boxtimes$	Agilent	PSG Analog Signal Generator	E8257D	MY51110112	Jul. 01, 2021	Jun. 30, 2022



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	$\boxtimes$	Agilent	Dower motor	E4419B	MY45102538	Jul. 01,	Jun. 30,
		/ glion	Power meter	E4419D	101140102000	2021	2022
	Agilent		Dower concer	E9301A	MY41495644	Jul. 01,	Jun. 30,
		Power sensor	E9301A	101141493044	2021	2022	
	$\boxtimes$	Agilent	Dower concer	E9301A	US39212148	Jul. 01,	Jun. 30,
		, ignorit	Agilent Power sensor		0339212140	2021	2022
	MCLI/USA	Directional			Jul. 17,	Jul. 16,	
		MCLI/USA	Coupler	CB11-20	0D2L51502	2020	2023

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#### 3. SAR Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

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(a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.

(b) Read the WWAN RF power level from the base station simulator.

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(c) For WLAN/Bluetooth power measurement, use engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power in each supported wireless interface and frequency band.

(d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/Bluetooth output power.

#### <SAR measurement>

(a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power, in the highest power channel.

- (b) Place the EUT in the positions as Appendix A demonstrates.
- (c) Set scan area, grid size and other setting on the OPENSAR software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band.

(f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

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

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

#### 3.1. Power Reference

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

#### 3.2. Area scan & Zoom scan

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

## 

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

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

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

			$\leq$ 3 GHz	> 3 GHz	
Maximum distance from (geometric center of pr			$5 \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$	
Maximum probe angle from probe axis to phantom surface normal at the measurement location			$30^{\circ} \pm 1^{\circ}$	$20^{\circ} \pm 1^{\circ}$	
			$\leq$ 2 GHz: $\leq$ 15 mm 2 - 3 GHz: $\leq$ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm	
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$			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 $\leq$ the corresponding evice with at least one	
Maximum zoom scan s	spatial reso	lution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$	$\leq 2 \text{ GHz:} \leq 8 \text{ mm}$ 2 - 3 GHz: $\leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz:} \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz:} \le 4 \text{ mm}^*$	
	uniform	grid: $\Delta z_{Zoom}(n)$	$\leq$ 5 mm	$3 - 4$ GHz: $\leq 4$ mm $4 - 5$ GHz: $\leq 3$ mm $5 - 6$ GHz: $\leq 2$ mm	
Maximum zoom scan spatial resolution, normal to phantom surface	graded	$\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq$ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm	
	grid	∆z <sub>Zoom</sub> (n>1): between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$		
Minimum zoom scan volume x, y, z		$ \ge 30 \text{ mm} \qquad \begin{array}{c} 3 - 4 \text{ GHz:} \ge 28 \text{ m} \\ 4 - 5 \text{ GHz:} \ge 25 \text{ m} \\ 5 - 6 \text{ GHz:} \ge 22 \text{ m} \end{array} $			

<sup>\*</sup> When zoom scan is required and the <u>reported</u> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is  $\leq$  1.4 W/kg,  $\leq$  8 mm,  $\leq$  7 mm and  $\leq$  5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

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

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

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

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

#### 3.4. Volumetric Scan

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

#### 3.5. Power Drift

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

## 4. System Verification Procedure

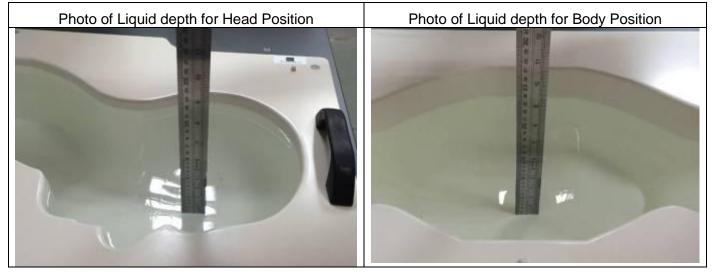
#### 4.1. Tissue Verification

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

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

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





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#### 4.1.1. Tissue Dielectric Parameter Check Results

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

	Measured	Target T	issue	Measure	d Tissue			
Tissue Type	Frequency (MHz)	εr (±5%)	σ (S/m) (±5%)	εr	σ (S/m)	Liquid Temp.	Test Date	
Head	2450	39.20	1.80	40.57	1.79	21.7 °C	Jan. 13, 2022	
2450	2430	(37.24~41.16)	(1.71~1.89)	40.57	1.75	21.7 0	Jan. 13, 2022	

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

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#### 4.2. System Verification Procedure

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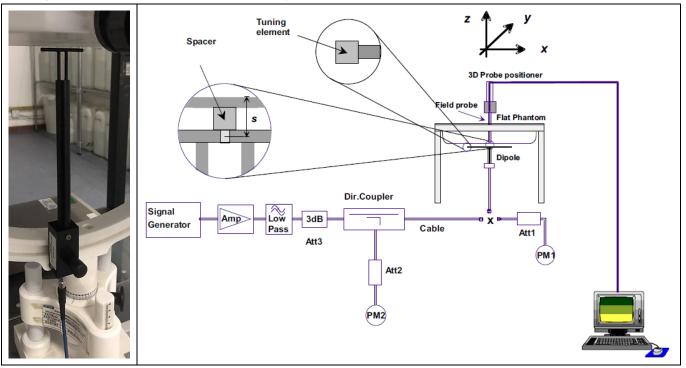
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The system verification is performed for verifying the accuracy of the complete measurement system and performance of the software. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler,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

The system verification is shown as below picture:



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#### 4.2.1. System Verification Results

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

System Verification	Target SA (±10	. ,	Measure (Normalize		Liquid	Test Date	
	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)	Temp.		
2450MHz	53.69 (48.33~59.05)	23.94 (21.55~26.33)	52.23	22.55	21.7 °C	Jan. 13, 2022	

#### Report No.: STR220104001003E



#### 5. SAR Measurement variability and uncertainty

#### 5.1. SAR measurement variability

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

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

2) When the original highest measured SAR is  $\geq$  0.80 W/kg, repeat that measurement once.

3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is  $\geq$  1.45 W/kg (~ 10% from the 1-g SAR limit).

4) Perform a third repeated measurement only if the original, first or second repeated measurement is  $\geq$ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

#### 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.

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## 6. **RF Exposure Positions**

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#### 6.1. SMART PHOTO FRAME host platform exposure conditions

Refer to KDB616217 D04, when the modular approach is used, transmitters and modules must be initially tested for standalone operations in generic host conditions according to the following minimum test separation distance and antenna installation requirements for incorporation in the tablet platform. The separation distance required for incorporation in qualified hosts is described in KDB 447498; item 5) of section 4.1 and item 1) of section 5.2.2 etc.

•  $\leq$  5 mm between the antenna and user for both back surface and edge exposure conditions

ertificate #4298.01

- the antennas used by the host must have been tested for equipment approval or qualify for SAR test exclusion
- the antenna polarization, physical orientation, rotation and installation configurations used by the host must have been tested for compliance or qualify for test exclusion
- when the *SAR Test Exclusion Threshold* in KDB 447498 applies, a *test separation distance* of 5 mm is required to determine test exclusion for the tablet platform

The antennas embedded in tablets are typically  $\leq 5$ mm from the outer housing. The required antenna to user test separation distance is a "not to exceed test" distance required to apply the modular approach. Instead of the typical zero gap tablet edge test requirement between the edge of a tablet and the user, when an antenna has been tested at  $\leq 5$  mm according to the modular approach it can be incorporated into tablets with at least twice the tested distance from the outer housing of the tablet edge; otherwise, the tablet edge zero gap test requirement applies. When the dedicated host approach is applied, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom.



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## 7. RF Output Power

#### 7.1. WLAN & Bluetooth Output Power

Mode	Channel	Frequency (MHz)	Tune-up	Output Power (dBm)
	1	2412	16.50	16.28
802.11b	6	2437	16.50	15.42
	11	2462	16.50	15.35
	1	2412	11.00	10.85
802.11g	6	2437	11.00	10.77
	11	2462	11.00	10.84
	1	2412	11.00	10.68
802.11n HT20	6	2437	11.00	10.73
	11	2462	11.00	10.81

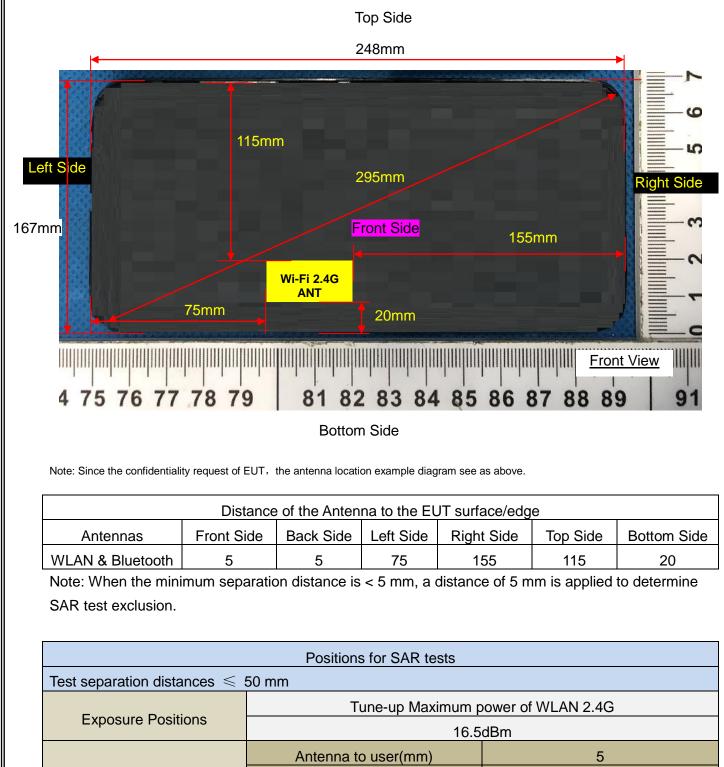
NOTE: Power measurement results of WLAN 2.4G.

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## 8. Antenna Location



Positions for SAR tests								
Fest separation distances $\leqslant$ 50 mm								
Tune-up Maximum power of WLAN 2.4G								
Exposure Positions	16.5	dBm						
	Antenna to user(mm)	5						
Front Side	SAR exclusion threshold	14						
	SAR testing required?	YES						
	Antenna to user(mm)	5						
Back Side	SAR exclusion threshold	14						
	SAR testing required?	YES						
Bottom Side	n Side Antenna to user(mm) 20							





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SAR exclusion threshold	3.5
SAR testing required?	YES

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

Positions for SAR tests								
Test separation distances > 50 mm								
	Tune-up Maximum p	power of WLAN 2.4G						
Exposure Positions	16.5dBm	44.67mW						
	Antenna to user(mm)	75						
Left Side	SAR exclusion threshold(mW)	346						
	SAR testing required?	NO						
	Antenna to user(mm)	155						
Right Side	SAR exclusion threshold(mW)	1146						
	SAR testing required?	NO						
	Antenna to user(mm)	115						
Top Side	SAR exclusion threshold(mW)	746						
	SAR testing required?	NO						

NOTE: Refer to section 4.3.1 of KDB 447498 D01.

### 9. SAR Results

#### 9.1. SAR measurement results

#### 9.1.1. SAR measurement Result of WLAN 2.4G

Test Position of	Test channel	Test		Value /kg)	Power Drift	Conducted	Tune-up	Scaled SAR	Date
Body with 0mm	/Freq.	Mode	1g	10g	(±5%)	power (dBm)	power (dBm)	10g (W/Kg)	Date
Front Side	6/2437	802.11b	0.396	0.161	0.58	15.42	16.50	0.508	2022/1/13
Back Side	6/2437	802.11b	0.612	0.249	-3.39	15.42	16.50	0.785	2022/1/13
Bottom Side	6/2437	802.11b	0.195	0.075	-1.93	15.42	16.50	0.250	2022/1/13

NOTE: Body SAR test results of WLAN 2.4G

## 10. Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR



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## 11. Appendix B. System Check Plots

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MEASUREMENT 1 System Performance Check - 2450MHz





# **MEASUREMENT 1**

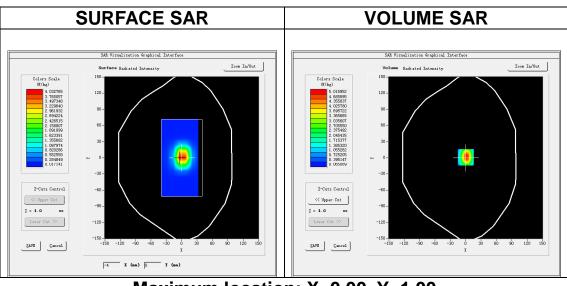
Date of measurement: 13/1/2022

## A. Experimental conditions.

Area Scan	<u>dx=12mm dy=12mm, h= 5.00 mm</u>
ZoomScan	7x7x7,dx=5mm dy=5mm dz=5mm
<b>Phantom</b>	Validation plane
Device Position	Dipole
Band	<u>CW2450</u>
<u>Channels</u>	Middle
<u>Signal</u>	CW (Crest factor: 1.0)

## **B. SAR Measurement Results**

Frequency (MHz)	2450.000000
Relative permittivity (real part)	40.570611
Relative permittivity (imaginary part)	13.182964
Conductivity (S/m)	1.794348
Variation (%)	-3.350000



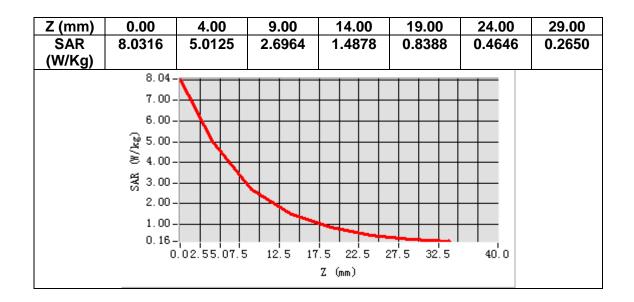
### Maximum location: X=0.00, Y=1.00 SAR Peak: 8.14 W/kg

SAR 10g (W/Kg)	2.255178
SAR 1g (W/Kg)	5.223456



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3D screen shot	Hot spot position



## **12. Appendix C. Plots of High SAR Measurement**

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MEASUREMENT 1 WLAN 2.4G Body





# **MEASUREMENT 1**

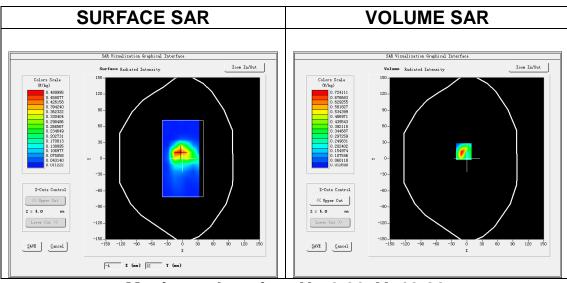
Date of measurement: 13/1/2022

## A. Experimental conditions.

Area Scan	<u>dx=12mm dy=12mm, h= 5.00 mm</u>
<u>ZoomScan</u>	<u>7x7x7,dx=5mm dy=5mm dz=5mm</u>
Phantom Phantom	Validation plane
<b>Device Position</b>	Body
Band	IEEE 802.11b ISM
<u>Channels</u>	Middle
<u>Signal</u>	IEEE802.11b (Crest factor: 1.0)

## **B. SAR Measurement Results**

Frequency (MHz)	2437.000000
Relative permittivity (real part)	40.622711
Relative permittivity (imaginary part)	13.101464
Conductivity (S/m)	1.773793
Variation (%)	-3.390000



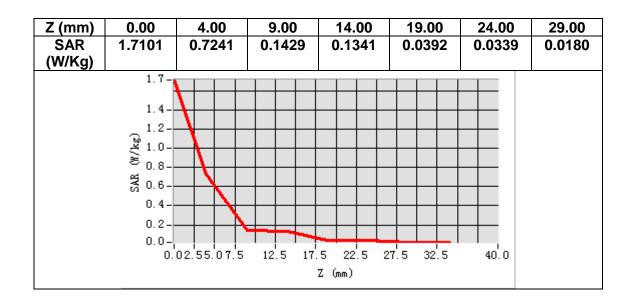
#### Maximum location: X=-6.00, Y=13.00 SAR Peak: 1.41 W/kg

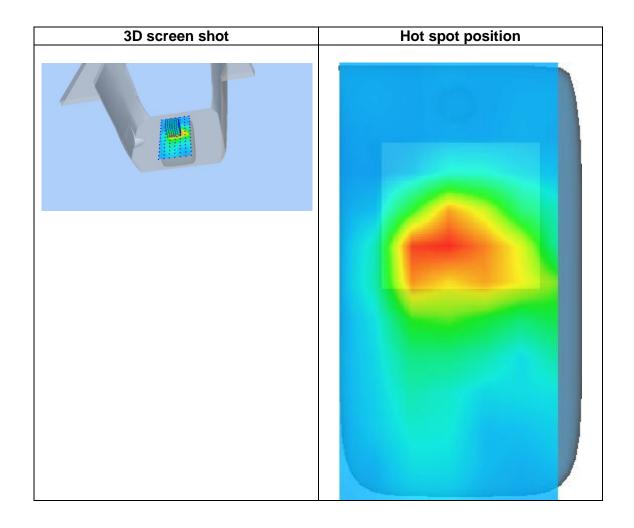
SAR 10g (W/Kg)	0.249066
SAR 1g (W/Kg)	0.611765



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## 13. Appendix D. Calibration Certificate

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E Field Probe - SN 08/16 EPGO287

2450 MHz Dipole - SN 03/15 DIP 2G450-352



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## **COMOSAR E-Field Probe Calibration Report**

Ref: ACR.60.1.21.MVGB.A

## SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

## BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET, BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA MVG COMOSAR DOSIMETRIC E-FIELD PROBE

SERIAL NO.: SN 08/16 EPGO287

#### Calibrated at MVG

Z.I. de la pointe du diable Technopôle Brest Iroise – 295 avenue Alexis de Rochon 29280 PLOUZANE - FRANCE

Calibration date: 03/01/2021



Accreditations #2-6789 and #2-6814 Scope available on www.cofrac.fr

#### Summary:

This document presents the method and results from an accredited COMOSAR E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).







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Report No.: STR220104001003E



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

	Name	Function	Date	Signature
Prepared by :	Jérôme Luc	Technical Manager	3/1/2021	Jes
Checked by :	Jérôme Luc	Technical Manager	3/1/2021	JES
Approved by :	Yann Toutain	Laboratory Director	3/1/2021	Gann Toutau

d'emplei 2021.03.0 1 13:07:12 +01'00'

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

Issue	Name	Date	Modifications
А	Jérôme Luc	3/1/2021	Initial release

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Report No.: STR220104001003E



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

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1

COMOSAR E-FIELD PROBE CALIBRATION REPORT

# DEVICE UNDER TEST

Device Under Test		
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE	
Manufacturer	MVG	
Model	SSE2	
Serial Number	SN 08/16 EPGO287	
Product Condition (new / used)	Used	
Frequency Range of Probe	0.15 GHz-6GHz	
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.211 MΩ	
	Dipole 2: R2=0.199 MΩ	
	Dipole 3: R3=0.199 MΩ	

# 2 **PRODUCT DESCRIPTION**

# 2.1 <u>GENERAL INFORMATION</u>

MVG's COMOSAR E field Probes are built in accordance to the IEEE 1528, FCC KDB865664 D01, CENELEC EN62209 and CEI/IEC 62209 standards.



Figure 1 – MVG COMOSAR Dosimetric E field Dipole

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

# **3 MEASUREMENT METHOD**

The IEEE 1528, FCC KDB865664 D01, CENELEC EN62209 and CEI/IEC 62209 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their affect. All calibrations / measurements performed meet the fore mentioned standards.

# 3.1 <u>LINEARITY</u>

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

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

# 3.2 <u>SENSITIVITY</u>

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

# 3.3 LOWER DETECTION LIMIT

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

#### 3.4 <u>ISOTROPY</u>

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

#### 3.1 BOUNDARY EFFECT

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

The boundary effect uncertainty can be estimated according to the following uncertainty approximation formula based on linear and exponential extrapolations between the surface and  $d_{be} + d_{step}$  along lines that are approximately normal to the surface:

$$\text{SAR}_{\text{uncertainty}} [\%] = \delta \text{SAR}_{\text{be}} \frac{\left(d_{\text{be}} + d_{\text{step}}\right)^2}{2d_{\text{step}}} \frac{\left(e^{-d_{\text{be}}/\delta/2}\right)}{\delta/2} \quad \text{for } \left(d_{\text{be}} + d_{\text{step}}\right) < 10 \text{ mm}$$

where	
SARuncertainty	is the uncertainty in percent of the probe boundary effect
dbe	is the distance between the surface and the closest zoom-scan measurement
	point, in millimetre
$\Delta_{\text{step}}$	is the separation distance between the first and second measurement points that
	are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible
δ	is the minimum penetration depth in millimetres of the head tissue-equivalent
	liquids defined in this standard, i.e., $\delta \approx 14 \text{ mm}$ at 3 GHz;
⊿SAR <sub>be</sub>	in percent of SAR is the deviation between the measured SAR value, at the
	distance $d_{be}$ from the boundary, and the analytical SAR value.

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

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The measured worst case boundary effect SARuncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).

# 4 MEASUREMENT UNCERTAINTY

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

Uncertainty analysis of the probe calibration in waveguide					
ERROR SOURCES	Uncertainty value (%)	Probability Distribution	Divisor	ci	Standard Uncertainty (%)
<b>Expanded uncertainty</b> 95 % confidence level k = 2					14 %

# 5 CALIBRATION MEASUREMENT RESULTS

Calibration Parameters		
Liquid Temperature	20 +/- 1 °C	
Lab Temperature	20 +/- 1 °C	
Lab Humidity	30-70 %	

### 5.1 SENSITIVITY IN AIR

Normx dipole		
$1 (\mu V / (V/m)^2)$	$2 (\mu V / (V/m)^2)$	$3 (\mu V/(V/m)^2)$
0.72	0.66	0.77

DCP dipole 1	DCP dipole 2	DCP dipole 3
(mV)	(mV)	(mV)
107	110	110

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

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

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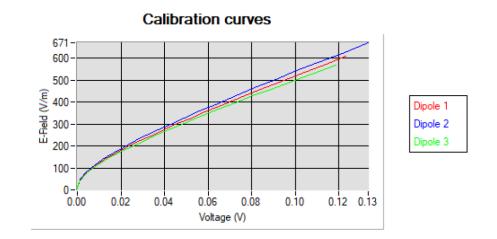
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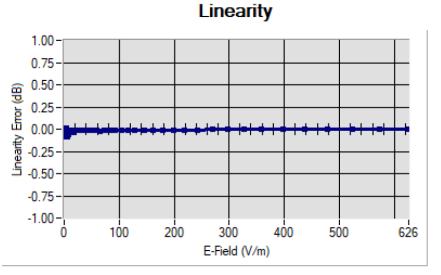


COMOSAR E-FIELD PROBE CALIBRATION REPORT

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# 5.2 <u>LINEARITY</u>



# Linearity:+/-1.90% (+/-0.08dB)

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

# 5.3 SENSITIVITY IN LIQUID

Liquid	Frequency (MHz +/-	ConvF
	$\frac{100 \text{MHz}}{100 \text{MHz}}$	
HL750	750	1.49
HL850	835	1.50
HL900	900	1.61
HL1800	1800	1.73
HL1900	1900	1.91
HL2000	2000	1.97
HL2300	2300	1.92
HL2450	2450	1.98
HL2600	2600	1.87
HL3300	3300	1.79
HL3500	3500	1.85
HL3700	3700	1.79
HL3900	3900	2.07
HL4200	4200	2.21
HL4600	4600	2.25
HL4900	4900	2.05
HL5200	5200	1.80
HL5400	5400	2.05
HL5600	5600	2.16
HL5800	5800	2.07

# LOWER DETECTION LIMIT: 8mW/kg

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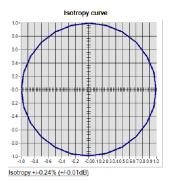


COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

# 5.4 <u>ISOTROPY</u>

# HL1800 MHz



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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.60.1.21.MVGB.A

# 6 LIST OF EQUIPMENT

Equipment Summary Sheet									
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date					
Flat Phantom	MVG	SN-20/09-SAM71	Validated. No cal required.	Validated. No cal required.					
COMOSAR Test Bench	Version 3	NA	Validated. No cal required.	Validated. No cal required.					
Network Analyzer	Rohde & Schwarz ZVM	100203	05/2019	05/2022					
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	05/2019	05/2022					
Multimeter	Keithley 2000	1160271	02/2020	02/2023					
Signal Generator	Rohde & Schwarz SMB	106589	04/2019	04/2022					
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.						
Power Meter	NI-USB 5680	170100013	05/2019	05/2022					
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.					
Waveguide	Mega Industries	069Y7-158-13-712	Validated. No cal required.	Validated. No cal required.					
Waveguide Transition	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.					
Waveguide Termination	Mega Industries	069Y7-158-13-701	Validated. No cal required.	Validated. No cal required.					
Temperature / Humidity Sensor	Testo 184 H1	44220687	05/2020	05/2023					

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Report No.: STR220104001003E



# SAR Reference Dipole Calibration Report

Ref: ACR.60.8.21.MVGB.A

# SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

BUILDING E, FENDA SCIENCE PARK, SANWEI COMMUNITY, XIXIANG STREET, BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA MVG COMOSAR REFERENCE DIPOLE FREQUENCY: 2450 MHZ

SERIAL NO.: SN 03/15 DIP2G450-352

# Calibrated at MVG

Z.I. de la pointe du diable Technopôle Brest Iroise – 295 avenue Alexis de Rochon 29280 PLOUZANE - FRANCE

Calibration date: 03/01/2021



Accreditations #2-6789 and #2-6814 Scope available on www.cofrac.fr

# Summary:

This document presents the method and results from an accredited SAR reference dipole calibration performed at MVG, using the COMOSAR test bench. The test results covered by accreditation are traceable to the International System of Units (SI).

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Report No.: STR220104001003E



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.60.8.21.MVGB.A

	Name	<b>Function</b>	Date	Signature
Prepared by :	Jérôme LUC	Technical Manager	3/1/2021	JS
Checked by :	Jérôme LUC	Technical Manager	3/1/2021	JS
Approved by :	Yann Toutain	Laboratory Director	3/1/2021	Gann Toutain
	•		-	2021.03.0



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

Issue	Name	Date	Modifications
А	Jérôme LE GALL	3/1/2021	Initial release

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Report No.: STR220104001003E



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.60.8.21.MVGB.A

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Report No.: STR220104001003E



SAR REFERENCE DIPOLE CALIBRATION REPORT

Ref: ACR.60.8.21 MVGB.A

#### INTRODUCTION 1

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

#### DEVICE UNDER TEST 2

Device Under Test					
Device Type	COMOSAR 2450 MHz REFERENCE DIPOLE				
Manufacturer	MVG				
Model	SID2450				
Serial Number	SN 03/15 DIP2G450-352				
Product Condition (new / used)	Used				

#### 3 PRODUCT DESCRIPTION

#### GENERAL INFORMATION 3.1

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



Figure 1 - MVG COMOSAR Validation Dipole

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# 4 MEASUREMENT METHOD

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

# 4.1 RETURN LOSS REQUIREMENTS

The dipole used for SAR system validation measurements and checks must have a return loss of -20 dB or better. The return loss measurement shall be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. A direct method is used with a network analyser and its calibration kit, both with a valid ISO17025 calibration.

### 4.2 MECHANICAL REQUIREMENTS

The IEEE Std. 1528 and CEI/IEC 62209 standards specify the mechanical components and dimensions of the validation dipoles, with the dimension's frequency and phantom shell thickness dependent. The COMOSAR test bench employs a 2 mm phantom shell thickness therefore the dipoles sold for use with the COMOSAR test bench comply with the requirements set forth for a 2 mm phantom shell thickness. A direct method is used with a ISO17025 calibrated caliper.

# 5 MEASUREMENT UNCERTAINTY

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

# 5.1 <u>RETURN LOSS</u>

The following uncertainties apply to the return loss measurement:

Frequency band	Expanded Uncertainty on Return Loss				
400-6000MHz	0.08 LIN				

### 5.2 DIMENSION MEASUREMENT

The following uncertainties apply to the dimension measurements:

Length (mm)	Expanded Uncertainty on Length			
0 - 300	0.20 mm			
300 - 450	0.44 mm			

### 5.3 VALIDATION MEASUREMENT

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

Scan Volume Expanded Uncertainty
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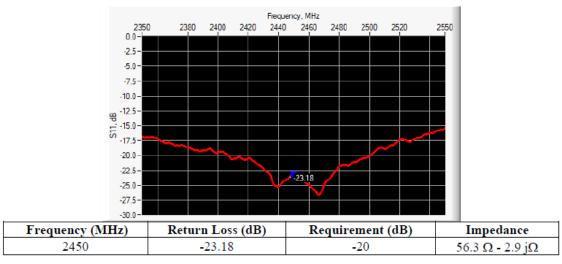
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1 g	19 % (SAR)
10 g	19 % (SAR)

# 6 CALIBRATION MEASUREMENT RESULTS

# 6.1 RETURN LOSS AND IMPEDANCE



# 6.2 MECHANICAL DIMENSIONS

Frequency MHz	Lmm		h mm		d mm	
	required	measured	required	measured	required	measured
300	420.0 ±1 %.		250.0 ±1 %.		6.35 ±1 %.	
450	290.0 ±1 %.		166.7 ±1 %.		6.35 ±1 %.	
750	176.0 ±1 %.		100.0 ±1 %.		6.35 ±1 %.	
835	161.0 ±1 %.		89.8 ±1 %.		3.6 ±1 %.	
900	149.0 ±1 %.		83.3 ±1 %.		3.6 ±1 %.	
1450	89.1 ±1 %.		51.7 ±1 %.		3.6 ±1 %.	
1500	80.5 ±1 %.		50.0 ±1 %.		3.6 ±1 %.	
1640	79.0 ±1 %.		45.7 ±1 %.		3.6 ±1 %.	
1750	75.2 ±1 %.		42.9 ±1 %.		3.6 ±1 %.	
1800	72.0 ±1 %.		41.7 ±1 %.		3.6 ±1 %.	
1900	68.0 ±1 %.		39.5 ±1 %.		3.6 ±1 %.	
1950	66.3 ±1 %.		38.5 ±1 %.		3.6 ±1 %.	
2000	64.5 ±1 %.		37.5 ±1 %.		3.6 ±1 %.	
2100	61.0 ±1 %.		35.7 ±1 %.		3.6 ±1 %.	
2300	55.5 ±1 %.		32.6 ±1 %.		3.6 ±1 %.	
2450	51.5 ±1 %.	-	30.4 ±1 %.	-	3.6 ±1 %.	-

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2600	48.5 ±1 %.	28.8 ±1 %	i.	3.6 ±1 %.	
3000	41.5 ±1 %.	25.0 ±1 %	i.	3.6 ±1 %.	
3500	37.0±1 %.	26.4 ±1 %	i.	3.6 ±1 %.	
3700	34.7±1 %.	26.4 ±1 %	i	3.6 ±1 %.	

# 7 VALIDATION MEASUREMENT

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

# 7.1 MEASUREMENT CONDITION

Software	OPENSAR V5
Phantom	SN 13/09 SAM68
Probe	SN 41/18 EPGO333
Liquid	Head Liquid Values: eps' : 41.9 sigma : 1.88
Distance between dipole center and liquid	10.0 mm
Area scan resolution	dx=8mm/dy=8mm
Zoon Scan Resolution	dx=5mm/dy=5mm/dz=5mm
Frequency	24502450 MHz
Input power	20 dBm
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

Frequency MHz	Relative permittivity (ɛ,')		Conductiv	it <mark>y (</mark> σ) S/m
	required	measured	required	measured
300	45.3 ±10 %		0.87 ±10 %	
450	43.5 ±10 %		0.87 ±10 %	
750	41.9 ±10 %		0.89 ±10 %	
835	41.5 ±10 %		0.90 ±10 %	
900	41.5 ±10 %		0.97 ±10 %	
1450	40.5 ±10 %		1.20 ±10 %	
1500	40.4 ±10 %		1.23 ±10 %	
1640	40.2 ±10 %		1.31 ±10 %	
1750	40.1 ±10 %		1.37 ±10 %	
1800	40.0 ±10 %		1.40 ±10 %	
1900	40.0 ±10 %		1.40 ±10 %	
1950	40.0 ±10 %		1.40 ±10 %	
2000	40.0 ±10 %		1.40 ±10 %	

## 7.2 HEAD LIQUID MEASUREMENT

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39.8 ±10 %		1.49 ±10 %	
39.5 ±10 %		1.67 ±10 %	
39.2 ±10 %	41.9	1.80 ±10 %	1.88
39.0 ±10 %		1.96 ±10 %	
38.5 ±10 %		2.40 ±10 %	
37.9 ±10 %		2.91 ±10 %	
	39.5 ±10 % 39.2 ±10 % 39.0 ±10 % 38.5 ±10 %	39.5 ±10 %       39.2 ±10 %       41.9       39.0 ±10 %       38.5 ±10 %	39.5 ±10 %         1.67 ±10 %           39.2 ±10 %         41.9         1.80 ±10 %           39.0 ±10 %         1.96 ±10 %         2.40 ±10 %

# 7.3 MEASUREMENT RESULT

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

Frequency MHz	1 g SAR (W/kg/W)		10 g SAR	(W/kg/W)
	required	measured	required	measured
300	2.85		1.94	
450	4.58		3.06	
750	8.49		5.55	
835	9.56		6.22	
900	10.9		6.99	
1450	29		16	
1500	30.5		16.8	
1640	34.2		18.4	
1750	36.4		19.3	
1800	38.4		20.1	
1900	39.7		20.5	
1950	40.5		20.9	
2000	41.1		21.1	
2100	43.6		21.9	
2300	48.7		23.3	
2450	52.4	53.69 (5.37)	24	23.94 (2.39)
2600	55.3		24.6	
3000	63.8		25.7	
3500	67.1		25	

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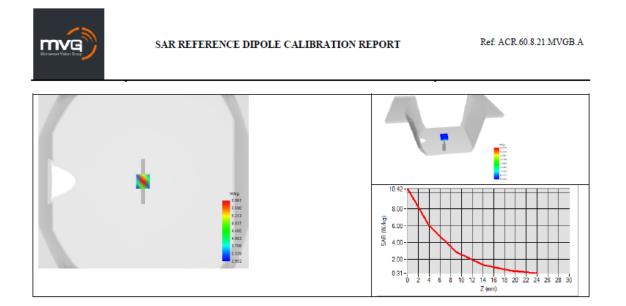
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# 8 LIST OF EQUIPMENT

Equipment Summary Sheet					
Equipment Description	Manufacturer / Model	Identification No.	Current Calibration Date	Next Calibration Date	
SAM Phantom	MVG	SN-13/09-SAM68	Validated. No cal required.	Validated. No cal required.	
COMOSAR Test Bench	Version 3	NA		Validated. No cal required.	
Network Analyzer	Rohde & Schwarz ZVM	100203	05/2019	05/2022	
Network Analyzer – Calibration kit	Rohde & Schwarz ZV-Z235	101223	05/2019	05/2022	
Calipers	Mitutoyo	SN 0009732	10/2019	10/2022	
Reference Probe	MVG	EPGO333 SN 41/18	05/2020	05/2021	
Multimeter	Keithley 2000	1160271	02/2020	02/2023	
Signal Generator	Rohde & Schwarz SMB	106589	04/2019	04/2022	
Amplifier	Aethercomm	SN 046	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.	
Power Meter	NI-USB 5680	170100013	05/2019	05/2022	
Directional Coupler	Narda 4216-20	01386	Characterized prior to test. No cal required.	Characterized prior to test. No cal required.	
Temperature / Humidity Sensor	Testo 184 H1	44220687	05/2020	05/2023	

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