SAR Evaluation Report

DUT Information	
Manufacturer	Panasonic Corporation
Brand Name	KX-TGDA66
Model Name	KX-TGDA66
FCC ID	ACJ96NKX-TGDA66
DUT Type	handset
Intended Use	☒ < 20 cm to human body (portable device) ☐ > 20 cm to human body (mobile/fixed device) ☐ - ☒ next to the ear ☐ body-worn ☐ limb-worn ☐ hand-held ☐ front-of-face ☐ body supported ☐ clothing-integrated
Prepared by	
Testing Laboratory	IMST GmbH, Test Center Carl-Friedrich-Gauß-Str. 2 – 4 47475 Kamp-Lintfort Germany
Laboratory Accreditation	The Test Center facility 'Dosimetric Test Lab' within IMST GmbH is accredited by the German National 'Deutsche Akkreditierungsstelle GmbH (DAkkS)' for testing according to the scope as listed in the accreditation certificate: D-PL-12139-01-01. The German Bundesnetzagentur (BNetzA) recognizes IMST GmbH as CAB-EMC on the basis of the Council Decision of 22. June 1998 concerning the conclusion of the MRA between the European Community and the United States of America (1999/178/EC) in accordance with § 4 of the Recognition Ordinance of 11. January 2016. The recognition is valid until 20. July 2021 under the registration number: BNetzA-CAB-16/21-14.
Prepared for	
Manufacturer	Panasonic Corporation 1-62, 4-Chome Minoshima, Hakata-ku 812-8531 Fukuoka Japan
Test Specification	
Applied Standard / Rule	IEEE 1528-2013; FCC CFR 47 § 2.1093
Exposure Category	☒ general public / uncontrolled exposure ☐ occupational / controlled exposure
Test Result	☒ PASS ☐ FAIL
Report Information	
Data Stored	6210313
Issue Date	May 4, 2021
Revision Date	
Revision Number*	
	***A new revision replaces all previous revisions and thus, become invalid herewith.**
Remarks	This report relates only to the item(s) evaluated. This report shall not be reproduced, except in its entirety, without the prior written approval of IMST GmbH. The results and statements contained in this report reflect the evaluation for the certain model described above. The manufacturer is responsible for ensuring that all production devices meet the intent of the requirements described in this report.

Table of Contents

1 Subject of Investigation and Test Results

The KX-TGDA66 is a new handset from Panasonic Corporation operating in DECT UPCS (TDD) standard with one integrated antenna. The objective of the measurements performed by IMST is the dosimetric assessment on one device in the intended use positions.

1.1 Technical Data of DUT

Product Specifications		
Manufacturer	Panasonic Corporation	
Model Name	KX-TGDA66 (refer to chapter 1.2)	
SN / IMST DUT No.	N/A / SAR 01	
Operation Mode	DECT UPCS (TDD)	
Frequency Range	1921.536 – 1928.448 MHz	
Number of Channels	5	
Maximum Active Slots	1	
Maximum Duty Cycle	4.17 % (1/24 crest factor)	
Antenna Type	integrated	
Maximum Output Power	refer chapter 7.3	
Power Supply	2x NiMH 1.2 V (DC 2.4V)	
Used Accessory	-	
DUT Stage	☒ production unit	☐ identical prototype
Notes:		

1.2 Product Family / Model Variants

As declared by the manufacturer, the assessed KX-TGDA66 is technically identical to the product variant KX-TGDA63. Both variants are electrically identical and the only difference is that they are sold with different base stations.

1.3 Antenna Configuration

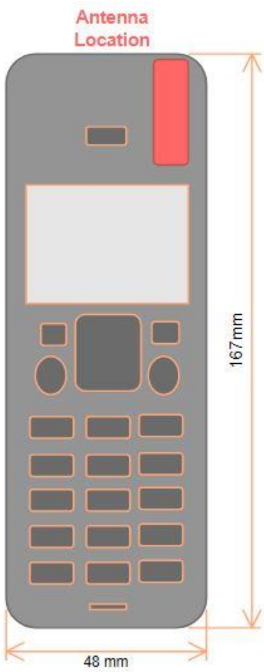

Fig. 1: Sketch of DUT.

1.4 Test Specification / Normative References

The tests documented in this report have been performed according to the standards and rules described below.

Test Specifications			
Test Standard / Rule		Description	Issue Date
☒	IEEE 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.	June 14, 2013
☐	FCC CFR 47 § 2.1091	Code of Federal Regulations; Title 47. Radiofrequency radiation exposure evaluation: **Mobile Devices.**	October 01, 2010
☒	FCC CFR 47 § 2.1093	Code of Federal Regulations; Title 47. Radiofrequency radiation exposure evaluation: **Portable Devices.**	October 01, 2010
☐	RSS-102, Issue 5	Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)	March, 2015
Measurement Methodology KDB			
☒	KDB 865664 D01 v01r04	SAR measurement 100 MHz to 6 GHz	August 07, 2015
☒	KDB 865664 D02 v01r01	Exposure Reporting	October 23, 2015
Product KDB			
☒	KDB 447498 D01 v06	General RF Exposure Guidance	October 23, 2015
☒	KDB 648474 D04 v01r03	Handset SAR	October 23, 2015

1.5 Attestation of Test Results

Highest Reported SAR									
Band	**Equipment Class**	**Freq. [MHz]**	**CH**	**DUT* Position**	**Gap [mm]**	**Pic. No.**	**Highest Reported SAR1g [W/kg]**	**SAR1g Limit [W/kg]**	
DECT	PUE	1924.99	0	Left Cheek	0	5	0.045	1.6	PASS
Notes:	To establish a connection at a specific channel and with maximum output power, engineering test software has been used. All measured SAR results and configurations are shown in chapter 7								

2 Quality Assurance

The responsible test engineer states that all the measurements and evaluations have been performed under the guidelines of the valid quality assurance plan according to DIN EN ISO IEC 17025-2017.

Prepared by: ....

Dessislava Patrishkova
Test Engineer

Reviewed by: ....

Alexander Rahn
Quality Assurance

3 Exposure Criteria and Limits

3.1 SAR Limits

Human Exposure Limits				
Condition	Uncontrolled Environment (General Population)		Controlled Environment (Occupational)	
	SAR Limit [W/kg]	Mass Avg.	SAR Limit [W/kg]	Mass Avg.
SAR averaged over the whole body mass	0.08	whole body	0.4	whole body
Peak spatially-averaged SAR for the head, neck & trunk	1.6	1g of tissue*	8.0	1g of tissue*
Peak spatially-averaged SAR in the limbs	4.0	10g of tissue*	20.0	10g of tissue*
Note: *Defined as a tissue volume in the shape of a cube				

Table 1: SAR limits specified in IEEE Standard C95.1-2005 and Health Canada's Safety Code 6.

In this report the comparison between the exposure limits and the measured data is made using the spatial peak SAR; the power level of the device under test guarantees that the whole body averaged SAR is not exceeded.

3.2 Exposure Categories

General Public / Uncontrolled Exposure
General population comprises individuals of all ages and of varying health status, and may include particularly susceptible groups or individuals. In many cases, members of the public are unaware of their exposure to electromagnetic fields. Moreover, individual members of the public cannot reasonably be expected to take precautions to minimize or avoid exposure.
Occupational / Controlled Exposure
The occupationally exposed population consists of adults who are generally exposed under known conditions and are trained to be aware of potential risk and to take appropriate precautions.

Table 2: RF exposure categories.

3.3 Distinction between Maximum Permissible Exposure and SAR Limits

The biological relevant parameter describing the effects of electromagnetic fields in the frequency range of interest is the specific absorption rate SAR (dimension: power/mass). It is a measure of the power absorbed per unit mass. The SAR may be spatially averaged over the total mass of an exposed body or its parts. The SAR is calculated from the r.m.s. electric field strength E inside the human body, the conductivity σ and the mass density ρ of the biological tissue:

$$SAR = \sigma \frac{E^2}{\rho} = c \left.\frac{\partial T}{\partial t}\right|_{t \to 0+} \quad . \tag{1}$$

The specific absorption rate describes the initial rate of temperature rise $\partial T / \partial t$ as a function of the specific heat capacity c of the tissue. A limitation of the specific absorption rate prevents an excessive heating of the human body by electromagnetic energy.

As it is sometimes difficult to determine the SAR directly by measurement (e.g. whole body averaged SAR), the standard specifies more readily measurable maximum permissible exposures in terms of external electric E and magnetic field strength H and power density S, derived from the SAR limits. The limits for E, H and S have been fixed so that even under worst case conditions, the limits for the specific absorption rate SAR are not exceeded.

4 The Measurement System

DASY is an abbreviation of „Dosimetric Assessment System“ and describes a system that is able to determine the SAR distribution inside a phantom of a human being according to different standards. The DASY4 system consists of the following items as shown in Fig: 2. Additionally, Fig: 3 shows the equipment, similar to the installations in other laboratories.

- Fully compliant with all current measurement standards as stated in Fig. 9
- High precision robot with controller
- Measurement server (for surveillance of the robot operation and signal filtering)
- Data acquisition electronics DAE (for signal amplification and filtering)
- Field probes calibrated for use in liquids
- Electro-optical converter EOC (conversion from the optical into a digital signal)
- Light beam (improving of the absolute probe positioning accuracy)
- Two SAM phantoms filled with tissue simulating liquid
- DASY4 software
- SEMCAD

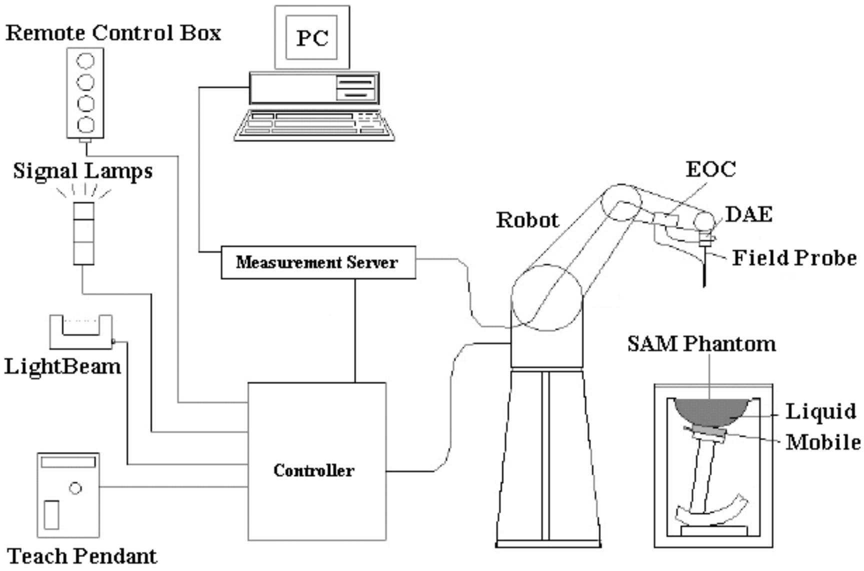

Fig. 2: The DASY4 measurement system.

Fig. 3: The measurement set-up with a DASY system and phantoms containing tissue simulating liquid.

The DUT operating at the maximum power level is placed by a non-metallic device holder (delivered from Schmid & Partner) in the above described positions at a shell phantom of a human being. The distribution of the electric field strength *E* is measured in the tissue simulating liquid within the shell phantom. For this miniaturised field probes with high sensitivity and low field disturbance are used. Afterwards the corresponding SAR values are calculated with the known electrical conductivity σ and the mass density ρ of the tissue in the SEMCAD FDTD software. The software is able to determine the averaged SAR values (averaging region 1 g or 10 g) for compliance testing.

The measurements are done by two scans: first a coarse scan determines the region of the maximum SAR, afterwards the averaged SAR is measured in a second scan within the shape of a cube.

4.1 Phantoms

TWIN SAM PHANTOM V4.0	
	Specific Anthropomorphic Mannequin defined in IEEE 1528 and IEC 62209-1 and delivered by Schmid & Partner Engineering AG. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. The details and the Certificate of conformity can be found in Fig. 10 on page 28.
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions	Length: 1000 mm; Width: 500 mm Height: adjustable feet
Filling Volume	approx. 25 liters

ELI PHANTOM V4.0	
	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. The details and the Certificate of conformity can be found in Fig. 11 on page 29.
Shell Thickness	2.0 ± 0.2 mm (bottom plate)
Dimensions	Major axis: 600 mm Minor axis: 400 mm
Filling Volume	approx. 30 liters

4.2 E-Field-Probes

For the measurements the Dosimetric E-Field Probes ET3DV6R or EX3DV4 with following specifications are used. They are manufactured and calibrated in accordance with FCC and IEEE 1528-2013 recommendations annually by Schmid & Partner Engineering AG.

ET3DV6R	
Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection system (ET3DV6 only) Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Dimensions	Overall length: 337 mm (Tip: 16 mm) Tip diameter: 6.8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.7 mm
Frequency	10 MHz to 2.3 GHz Linearity: ± 0.2 dB (30 MHz to 2.3 GHz)
Directivity	Axial isotropy: ± 0.2 dB in TSL (rotation around probe axis) Spherical isotropy: ± 0.4 dB in TSL (rotation normal to probe axis)
Dynamic Range	5 µW/g to > 100 mW/g; Linearity: ± 0.2 dB
Calibration Range	450 MHz / 750 MHz / 835 MHz / 1750 MHz / 1900 MHz

EX3DV4	
Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	Axial isotropy: ± 0.3 dB in TSL (rotation around probe axis) Spherical isotropy: ± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 µW/g)
Calibration Range	2450 MHz / 2600 MHz / 5250 MHz / 5600 MHz / 5800 MHz

5 Measurement Procedure

5.1 General Requirement

The test shall be performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature shall be in the range of 20°C to 26°C and 30-70% humidity. All tests have been conducted according the latest version of all relevant KDBs.

5.2 Test Position of DUT operating next to the Human Ear

5.2.1 Phantom Requirements

The phantom is a simplified representation of the human anatomy and comprised of material with electrical properties similar to the corresponding tissues. The physical characteristics of the phantom model shall resemble the head and the neck of a user since the shape is a dominant parameter for exposure.

5.2.2 Reference Points

As it cannot be expected that the user will hold the mobile phone exactly in one well defined position, different operational conditions shall be tested. The standards require two test positions. For an exact description helpful geometrical definitions are introduced and shown in Fig. 4 - 6. There are two imaginary lines on the mobile, the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset: the midpoint of the width w_t of the handset at the level of the acoustic output (point A on Fig. 4 and 6), and the midpoint of the width w_b of the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output (see Fig. 4). The horizontal line is also tangential to the face of the handset at point A. The two lines intersect at point A.

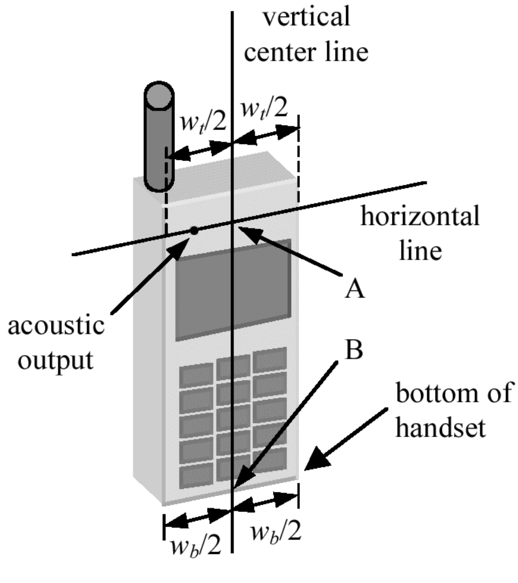

Fig. 4: Geometrical definitions on the telephone (bar phone).

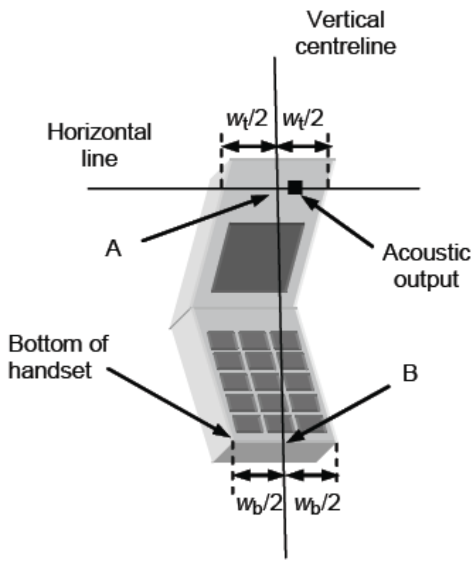

Fig. 5: Geometrical definitions on the telephone (clam shell or flip).

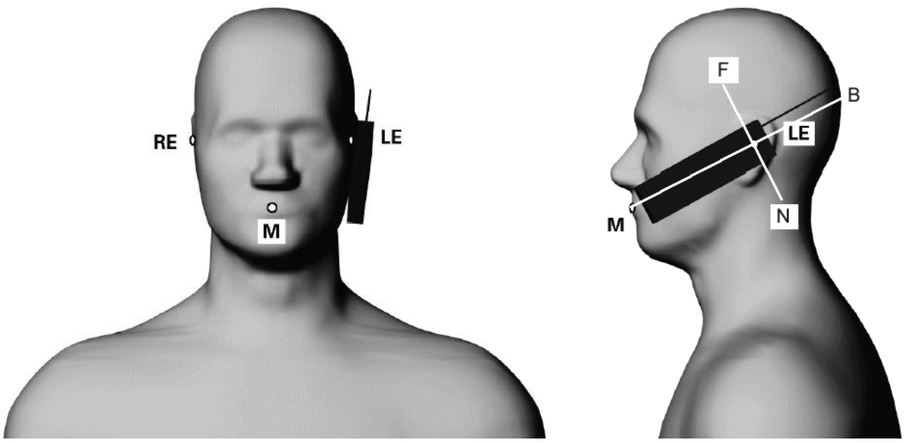

Fig. 6: Phantom reference points.

According to Fig. 6 the human head position is given by means of the following three reference points: auditory canal opening of both ears (RE and LE) and the center of the closed mouth (M). The ear reference points are 15 - 17 mm above the entrance to the ear canal along the BM line (back-mouth), as shown in Fig. 6. The plane passing through the two ear canals and M is defined as the reference plane. The line NF (Neck-Front) perpendicular to the reference plane and passing through the RE (or LE) is called the reference pivoting line. Line BM is perpendicular to the NF line. With this definitions the test positions are given by

5.2.3 Cheek Position:

Position the handset close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Fig. 6), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom. Translate the handset towards the phantom along the line passing through RE and LE until the handset touches the ear. While maintaining the handset in this plane, rotate it around the LE-RE line until the vertical centerline is in the plane normal to MB-NF including the line MB (called the reference plane). Rotate the phone around the vertical centerline until the phone (horizontal line) is symmetrical with respect to the line NF. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the phone contact with the ear, rotate the handset about the line NF until any point on the handset is in contact with a phantom point below the ear.

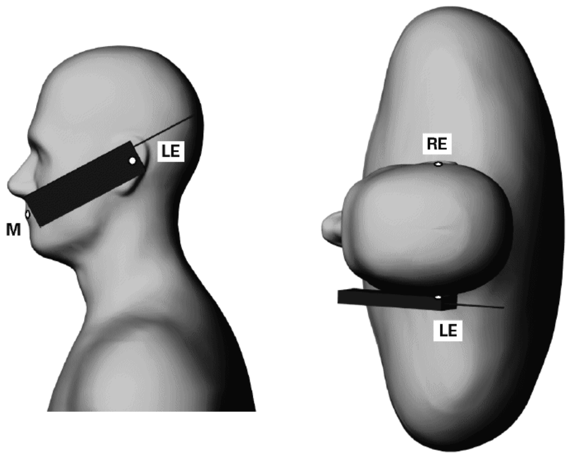

Fig. 7: The cheek position.

5.2.4 Tilted Position:

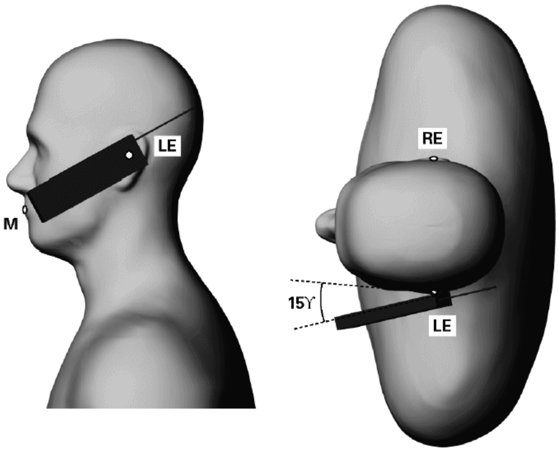

Fig. 8: The tilted position.

While maintaining the orientation of the phone retract the phone parallel to the reference plane far enough to enable a rotation of the phone by 15°. Rotate the phone around the horizontal line by 15°. While maintaining the orientation of the phone, move the phone parallel to the reference plane until any part of the phone touches the head. In this position, point A will be located on the line RE-LE.

5.2.5 Test to be Performed

The SAR test shall be performed with both phone positions described above, on the left and right side of the phantom. The device shall be measured for all modes operating when the device is next to the ear, even if the different modes operate in the same frequency band.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value.

The SAR test shall be performed at the high, middle and low frequency channels of each operating mode. If the SAR measured at the middle channel for each test configuration is at least 3.0 dB lower than the SAR limit, testing at the high and low channels is optional.

5.3 Measurement Procedure

The following steps are used for each test position:

- Establish a call with the maximum output power with a base station simulator. The connection between the mobile phone and the base station simulator is established via air interface.
- Measurement of the local E-field value at a fixed location (P1). This value serves as a reference value for calculating a possible power drift.
- Measurement of the SAR distribution with resolution settings for area scan and zoom scan according KDB 865664 D01 as shown in Table *3*.
- The used extrapolation and interpolation routines are all based on the modified Quadratic Shepard´s method [DASY4].
- Repetition of the E-field measurement at the fixed location (P1) and repetition of the whole procedure if the two results differ by more than ± 0.21dB.

<table>
<tr><th colspan="3"></th><th>≤ 3 GHz</th><th>≥ 3 GHz</th></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5 ± 1 mm</td><td>½·δ·ln(2) ± 0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30° ± 1°</td><td>20° ± 1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}</td><td>≤ 2 GHz: ≤ 15 mm
2 - 3 GHz: ≤ 12 mm</td><td>3 - 4 GHz: ≤ 12 mm
4 - 6 GHz: ≤ 10 mm</td></tr>
<tr><td colspan="2">When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: ΔX_{Zoom}, ΔY_{Zoom}</td><td>≤ 2 GHz: ≤ 8 mm
2 - 3 GHz: ≤ 5 mm*</td><td>3 - 4 GHz: ≤ 5 mm*
4 - 6 GHz: ≤ 4 mm*</td></tr>
<tr><td rowspan="3">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2">Uniform grid: $\Delta Z_{Zoom}(n)$</td><td>≤ 5 mm</td><td>3 - 4 GHz: ≤ 4 mm
4 - 5 GHz: ≤ 3 mm
5 - 6 GHz: ≤ 2 mm</td></tr>
<tr><td rowspan="2">graded grid</td><td>$\Delta Z_{Zoom}(1)$: between 1st two points closest to phantom surface</td><td>≤ 4 mm</td><td>3 - 4 GHz: ≤ 3 mm
4 - 5 GHz: ≤ 2.5 mm
5 - 6 GHz: ≤ 2 mm</td></tr>
<tr><td>$\Delta Z_{Zoom}(n>1)$: between subsequent points</td><td colspan="2">≤ 1.5· $\Delta Z_{Zoom}(n-1)$</td></tr>
<tr><td>Minimum zoom scan volume</td><td colspan="2">x, y, z</td><td>≥ 30 mm</td><td>3 - 4 GHz: ≥ 28 mm
4 - 5 GHz: ≥ 25 mm
5 - 6 GHz: ≥ 22 mm</td></tr>
<tr><td colspan="5">Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium: see draft standard IEEE P1528-2011 for details.
* When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 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</td></tr>
</table>

Table 3: Parameters for SAR scan procedures.

6 System Verification and Test Conditions

6.1 Date of Testing

Date of Testing				
Band	**Test Position**	**Frequency [MHz]**	**Date of System Check**	**Date of SAR Measurement**
DECT	Head	1900	April 28, 2021	April 28, 2021

Table 4: Date of testing.

6.2 Environment Conditions

Environment Conditions		
Ambient Temperature[°C]	**Liquid Temperature [°C]**	**Humidity [%]**
22.0 ± 2	22.0 ± 2	40.0 ± 10
Notes: To comply with the required noise level (less than 12 mW/kg) periodically measurements without a DUT were conducted.		

Table 5: Environment Conditions.

6.3 Tissue Simulating Liquid Recipes

Tissue Simulating Liquid								
Frequency Range		**Water**	**Tween 20**	**Tween 80**	**Salt**	**Preventol**	**DGME**	**Triton X/100**
[MHz]		**[%]**	**[%]**	**[%]**	**[%]**	**[%]**	**[%]**	**[%]**
Head Tissue								
☐	450	50.8	47.5	-	1.6	0.1	-	-
☐	700 - 1000	52.8	46.0	-	1.1	0.1	-	-
☐	1600 - 1800	55.4	44.1	-	0.4	0.1	-	-
☒	1850 - 1980	55.2	44.5	-	0.2	0.1	-	-
☐	2000 - 2700	55.7	45.2	-	-	0.1	-	-
☐	5000 - 6000	65.5	-	-	-	-	17.25	17.25

Table 6: Recipes of the tissue simulating liquid.

6.4 Tissue Simulating Liquid Parameters

For the measurement of the following parameters the Speag DAK-3.5 dielectric probe kit is used, representing the open-ended coaxial probe measurement procedure.

Recommended values for the dielectric parameters of the tissue simulating liquids are given in IEEE 1528 and FCC published RF Exposure KDB Procedures. All tests were carried out using liquids with dielectric parameters within +/- 5% of the recommended values. The dielectric properties of the tissue simulating liquid have been measured within 24 h before SAR testing. The depth of the tissue simulant was at least 15.0 cm for all system check and device tests, measured from the ear reference point in case of the SAM phantom and from the inner surface of the flat phantom.

Tissue Simulating Liquids Parameters									
Ambient Temperature(C) : 22.0 ± 2				Liquid Temperature(C) : 22.0 ± 2			Humidity(%) : 40.0 ± 5		
Band	Date	Frequency	Channel	Permittivity			Conductivity		
				Measured	Target	Delta	Measured	Target	Delta
		[MHz]		ε'	ε'	+/- 5 [%]	σ [S/m]	σ [S/m]	+/- 5 [%]
DECT 1900 MHz	April 28, 2021	*1900.0*	*System Check*	*39.7*	*40.0*	*-0.7*	*1.39*	*1.40*	*-0.8*
		1921.536	4	39.6	40.0	-0.9	1.41	1.40	0.5
		1924.992	2	39.6	40.0	-0.9	1.41	1.40	0.7
		1928.448	0	39.6	40.0	-1.0	1.42	1.40	1.1

Table 7: Parameters of the head tissue simulating liquid.

6.5 Simplified Performance Checking

The simplified performance check was realized using the dipole validation kit. The input power of the dipole antenna was 250 mW (CW) and it was placed under the flat part of the SAM phantom. The target and measured results are listed in the table 8 and shown in Appendix C - System Verification Plots. The target values were adopted from the calibration certificates found also in the appendix.

System Check Results										
Frequency [MHz]	Dipole #SN	Measured				Target		Delta		Date
		with 250 mW		scaled to 1 W		normalized to 1 W		+/- 10 [%]		
		1g	10g	1g	10g	1g	10g	1g	10g	
1900	D1900V2 #535	9.17	4.88	36.68	19.52	39.20	20.50	-6.43	-4.78	April 28, 2021

Table 8: Dipole target and measured results.

7 SAR Measurement Conditions and Results

7.1 Test Conditions

Test Conditions				
Band	**TX Range [MHz]**	**Used Channels**	**Crest Factor**	**Phantom**
DECT	1921.536 - 1928.448	04, 02, 00	24	SAM Twin Phantom V4.0
Notes:				

Table 9: Used channels and crest factors during the test.

7.2 Tune-Up Information

Tune-Up Output Power			
Band	**Frequency [MHz]**	**CH**	**Max. Tune-Up Limit [dBm]**
DECT	1921.536	04	20.0
	1924.992	02	20.0
	1928.448	00	20.0
Notes: According to the manufacturer both antennas have the same tune-up output values.			

Table 10: Maximum transmitting output power values for DECT declared by the manufacturer.

7.3 Measured Output Power

Max. Averaged Output Power				
Antenna	**Mode**	**Frequency [MHz]**	**CH**	**Measured Output Power [dBm]**
DECT	GFSK	1921.536	04	19.8
		1924.992	02	19.9
		1928.448	00	19.9
Notes: -				

Table 11: Conducted output power values for DECT.

7.4 Standalone SAR Test Exclusion according to KDB 447498

SAR test exclusion is determined for the DUT according to KDB 447498 D01 with 1g SAR exclusion thresholds for 100 MHz to 6GHz at test separation distances ≤ 50 mm determined by:

*[(max power of channel. incl. tune-up tolerance. mW) / (min test separation distance. mm)] * [√f(GHz)]*

≤ 3.0 for 1g SAR and ≤ 7.5 for 10g extremity SAR, where

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

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

Standalone SAR Test Exclusion Consideration (FCC)												
Mode	Freq.	Distance	Output Power (peak)		Maximum Duty Cycle	Output Power (average)		Threshold Comparison Value	Exclusion Threshold SAR 1g	SAR Testing Exclusion	Estimated SAR Values	SAR Testing Required
	[MHz]	[mm]	[dBm]	[mW]	[%]	[dBm]	[mW]					
DECT	1925	5	20.0	100.00	4.17	6.20	4.17	1.2	≤ 3.0	YES	measured	NO
Notes:												

Table 12: SAR test exclusion for the applicable transmitter according to KDB 447498.

When the standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas the standalone SAR must be estimated according to KDB 447498 in order to determine simultaneous transmission SAR test exclusion:

- *(max. power of channel. including tune-up tolerance. mW)/(min. test separation distance. mm)]·[√f(GHz)/x] W/kg for test separation distances ≤ 50 mm;*

where x = 7.5 for 1-g SAR and x = 18.75 for 10-g SAR

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

- *0.4 W/kg for 1g SAR and 1.0 W/kg for 10g SAR. when the test separation distance is > 50 mm*

7.5 SAR Measurement Results

SAR assessment was conducted in the worst case configuration with output power values according to the tables in Chapter 7.3. According to KDB 447498 D01, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance limit shown in Table 10.

Reported SAR is calculated by the following formulas:

- Scaling factor tune up limit = tune-up limit power (mW) / RF power (mW)
- Scaling factor max. duty cycle = max. possible duty cycle / used duty cycle for SAR measurement
- Reported SAR = measured SAR * scaling factor tune up limit * scaling factor max. duty cycle

The plots with the highest measured SAR values are shown in Appendix B - SAR Distribution Plots.

7.5.1 SAR Measurement Results for DECT

SAR Measurement Results in Head Configuration (DECT)												
Band	**Freq. [MHz]**	**CH**	**DUT* Position**	**Gap [mm]**	**Pic. No.**	**Measured SAR1g [W/kg]**	**Power Drift [dB]**	**Power [dBm]**		**Tune-Up SF**	**Reported SAR1g [W/kg]**	**Plot No.**
								Measured	**Limit**			
DECT	1924.99	2	LC	0	3	0.042	-0.025	19.9	20.0	1.023	0.043	-
			LT	0	4	0.022	-0.046	19.9		1.023	0.023	-
			RC	0	5	0.034	-0.061	19.9		1.023	0.035	-
			RT	0	6	0.021	-0.200	19.9		1.023	0.021	-
	1921.54	4	LC	0	5	0.039	-0.195	19.8		1.023	0.040	-
	1924.99	0	LC	0	5	0.043	-0.063	19.9		1.047	0.045	1
Notes:	* LC – Left Cheek; LT – Left Tilted; RC-Right Cheek; RT – Right Tilted;											

Table 13: SAR measurement results in head configuration.

8 Administrative Measurement Data

8.1 Calibration of Test Equipment

Test Equipment Overview						
	Test Equipment	**Manufacturer**	**Model**	**Serial Number**	**Last Calibration**	**Next Calibration**
DASY System Components						
☒	Software Versions DASY4	SPEAG	V4.7	N/A	N/A	N/A
☒	Software Versions SEMCAD	SPEAG	V1.8	N/A	N/A	N/A
☐	Dosimetric E-Field Probe	SPEAG	ET3DV6R	1579	02/2020	02/2022
☒	Dosimetric E-Field Probe	SPEAG	ET3DV6R	1669	03/2021	03/2023
☐	Dosimetric E-Field Probe	SPEAG	EX3DV4	3536	08/2020	08/2022
☐	Dosimetric E-Field Probe	SPEAG	EX3DV4	3860	10/2019	10/2021
☒	Data Acquisition Electronics	SPEAG	DAE 3	335	03/2021	03/2022
☐	Data Acquisition Electronics	SPEAG	DAE 4	631	08/2020	08/2021
☐	Phantom	SPEAG	SAM	1059	N/A	N/A
☐	Phantom	SPEAG	SAM	1176	N/A	N/A
☒	Phantom	SPEAG	SAM	1340	N/A	N/A
☐	Phantom	SPEAG	SAM	1341	N/A	N/A
☐	Phantom	SPEAG	ELI4	1004	N/A	N/A
Dipoles						
☐	System Validation Dipole	SPEAG	D450V2	1014	03/2021	03/2024
☐	System Validation Dipole	SPEAG	D835V2	470	03/2021	03/2024
☐	System Validation Dipole	SPEAG	D1640V2	311	09/2018	09/2021
☐	System Validation Dipole	SPEAG	D1750V2	1005	03/2021	03/2024
☒	System Validation Dipole	SPEAG	D1900V2	535	03/2021	03/2024
☐	System Validation Dipole	SPEAG	D2450V2	709	11/2018	11/2021
☐	System Validation Dipole	SPEAG	D2600V2	1019	11/2018	11/2021
☐	System Validation Dipole	SPEAG	D5GHzV2	1028	04/2020	04/2023
Material Measurement						
☒	Network Analyzer	Agilent	E5071C	MY46103220	08/2019	08/2021
☒	Dielectric Probe Kit	SPEAG	DAK-3.5	1234	02/2020	02/2022
☒	Thermometer	LKMelectronic	DTM3000	3511	02/2020	02/2022
Power Meters and Sensors						
☒	Power Meter	Anritsu	ML2487A	6K00002319	07/2020	07/2022
☒	Power Sensor	Anritsu	MA2472A	990365	07/2020	07/2022
☒	Power Meter	Anritsu	ML2488A	6K00002078	07/2020	07/2022
☒	Power Sensor	Anritsu	MA2472A	002122	07/2020	07/2022
☒	Spectrum Analyzer	Rohde & Schwarz	FSP7	100433	01/2021	01/2023
RF Sources						
☒	Network Analyzer	Agilent	E5071C	MY46103220	08/2019	08/2021
☐	RF Generator	Rohde & Schwarz	SM300	100142	N/A	N/A
Amplifiers						
☒	Amplifier 10 MHz – 4200 MHz	Mini Circuits	ZHL-42-42W	D080504-1	N/A	N/A
☐	Amplifier 2 GHz – 6 GHz	Ciao Wireless	CA26-451	37452	N/A	N/A
Radio Tester						
☐	Radio Communication Tester	Anritsu	MT8815B	6200576536	06/2020	06/2022
☐	Radio Communication Tester	Anritsu	MT8820C	6200918336	05/2020	05/2022
Notes: Used test equipment for measurement is checked above.						

Table 14: Calibration of test equipment.

8.2 Uncertainty Assessment

Uncertainty Budget for SAR Measurements according to IEEE 1528-2013 (300 MHz - 6 GHz)								
Error Sources	**Uncertainty Value [± %]**	**Probability Distribution**	**Divisor**	**ci**	**ci**	**Standard Uncertainty [± %]**		**vi² or veff**
Measurement System				1g	10g	1g	10g	
Probe calibration	6.7	Normal	1	1	1	6.7	6.7	∞
Axial isotropy	0.3	Rectangular	√3	√0.5	√0.5	0.1	0.1	∞
Hemispherical isotropy	1.3	Rectangular	√3	√0.5	√0.5	0.5	0.5	∞
Boundary effects	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Linearity	0.3	Rectangular	√3	1	1	0.2	0.2	∞
System detection limit	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Modulation response	4.0	Rectangular	√3	1	1	2.3	2.3	∞
Readout electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response time	0.8	Rectangular	√3	1	1	0.5	0.5	∞
Integration time	1.4	Rectangular	√3	1	1	0.8	0.8	∞
RF ambient conditions - noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF ambient conditions - refl.	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe positioner mech. tol.	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe positioning	2.9	Rectangular	√3	1	1	1.7	1.7	∞
Algorithms for max SAR eval.	4.0	Rectangular	√3	1	1	2.3	2.3	∞
Test Sample Related								
Test sample positioning	2.9	Normal	1	1	1	2.9	2.9	145
Device holder uncertainty	3.6	Normal	1	1	1	3.6	3.6	5
SAR drift measurement (< 0.2 dB)	4.7	Rectangular	√3	1	1	2.7	2.7	∞
SAR scaling	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Phantom and Set-up								
Phantom uncertainty	4.0	Rectangular	√3	1	1	2.3	2.3	∞
SAR correction for perm./cond.	1.9	Normal	1	1	0.84	1.9	1.6	∞
Liquid conductivity (meas.)	5.0	Normal	1	0.78	0.71	3.9	3.6	∞
Liquid permittivity (meas.)	5.0	Normal	1	0.23	0.26	1.2	1.3	∞
Liquid conductivity temp. unc.	2.9	Rectangular	√3	0.78	0.71	1.3	1.2	∞
Liquid permittivity temp. unc.	1.8	Rectangular	√3	0.23	0.26	0.2	0.3	∞
Combined Standard Uncertainty						11.1	11.0	
Coverage Factor for 95%						kp=2		
Expanded Standard Uncertainty						**22.2**	**21.9**	
Notes: *Worst case probe calibration uncertainty has been applied for all available probes and frequencies.*								

Table 15: Uncertainty budget for SAR measurements.

Uncertainty Budget for SAR System Validation according to IEEE 1528-2013 (300 MHz - 6 GHz)								
Error Sources	**Uncertainty Value [± %]**	**Probability Distribution**	**Divisor**	**ci**	**ci**	**Standard Uncertainty [± %]**		**vi² or veff**
Measurement System				1g	10g	1g	10g	
Probe calibration	6.7	Normal	1	1	1	6.7	6.7	∞
Axial isotropy	0.3	Rectangular	√3	1	1	0.1	0.1	∞
Hemispherical isotropy	1.3	Rectangular	√3	0	0	0.0	0.0	∞
Boundary effects	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Linearity	0.3	Rectangular	√3	1	1	0.2	0.2	∞
System detection limit	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Modulation response	0.0	Rectangular	√3	0	0	0.0	0.0	∞
Readout electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response time	0.0	Rectangular	√3	0	0	0.0	0.0	∞
Integration time	0.0	Rectangular	√3	0	0	0.0	0.0	∞
RF ambient conditions - noise	1.0	Rectangular	√3	1	1	0.6	0.6	∞
RF ambient conditions - refl.	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Probe positioner mech. tol.	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe positioning	2.9	Rectangular	√3	1	1	1.7	1.7	∞
Algorithms for max SAR eval.	4.0	Rectangular	√3	1	1	2.3	2.3	∞
Validation Dipole								
Dev. of exp. dipole from num.	5.0	Normal	1	1	1	5.0	5.0	∞
Input power and SAR drift (< 0.2 dB)	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Dipole axis to liquid distance (< 2deg)	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Phantom and Set-up								
Phantom uncertainty	4.0	Rectangular	√3	1	1	2.3	2.3	∞
SAR correction for perm./cond.	1.9	Normal	1	1	0.84	1.9	1.6	∞
Liquid conductivity (meas.)	5.0	Normal	1	0.78	0.71	3.9	3.6	∞
Liquid permittivity (meas.)	5.0	Normal	1	0.23	0.26	1.2	1.3	∞
Liquid conductivity temp. unc.	2.9	Rectangular	√3	0.78	0.71	1.3	1.2	∞
Liquid permittivity temp. unc.	1.8	Rectangular	√3	0.23	0.26	0.2	0.3	∞
Combined Standard Uncertainty						10.7	10.6	
Coverage Factor for 95%						kp=2		
Expanded Standard Uncertainty						**21.5**	**21.2**	
Notes: *Worst case probe calibration uncertainty has been applied for all available probes and frequencies.*								

Table 16: Uncertainty budget for SAR system validation.

9 Report History

Revision History				
Revision	**Description of Revision**	**Date**	**Revised Page**	**Revised By**
/	Initial Release	May 4, 2021	-	-

END OF THE SAR REPORT

Please refer to separated appendix file for the following data:

- Appendix A - Pictures
- Appendix B - SAR Distribution Plots
- Appendix C - System Verification Plots
- Appendix D – Certificates of Conformity
- Appendix E – Calibration Certificates for DAEs
- Appendix F – Calibration Certificates for E-Field Probes
- Appendix G – Calibration Certificates for Dipoles