Overcoming Regulatory Challenges for Efficient Laboratory Evaluation of Wireless DevicesTCB Workshop, Oct 2024

Niels Kuster, ETH Zurich & IT'IS Foundation

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Outline

- Conflict of Interest
- **Discussion of Scientific Challenges**
	- 1: assessment of IPD in the reactive near-field
	- 2: surface conformal IPD
	- 3: assessment of APD
	- 4: comprehensive but agnostic validation systems
	- 5: evaluation of exposure mitigation features (TA, spatial diversity, proximity, motion, etc.)
- Status Summary of Scientific Challenges

Conflict of Interest

- **F** founder & director of the ITIS Foundation
- founder, direct & indirect shareholder, president of NFT, SPEAG, ZMT, TI Solutions AG
- IT'IS received funds from various wireless and medical device companies
- \bullet collaborations with regulators, e.g., FCC, FDA, NIST, NICT, NIM, CTTL, RRA, etc.
- member of TC106/62209, IEC TC106/62253, ICES TC43/SC2, ICES TC28/SC1, SC2, SC3, SC4, CTIA ERP, ANSI 63.19, ITU SG1, WP-1B, IEC/62/MT40, ISO TS10974 JWG AMID, V&V40 (ASME), MDIC

Recap of Science of mmWave Absorption

presented in detail last year

Bioelectromagnetics 41:348-359 (2020)

Limitations of Incident Power Density as a Proxy for **Induced Electromagnetic Fields**

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The most recent safety guidelines define basic restrictions for electromagnetic field exposure at frequencies more than 6 GHz in terms of spatial- and time-averaged transmitted power density inside the body. To enable easy-to-perform evaluations in situ, the reference levels for the incident power density were derived. In this study, we examined whether compliance with the reference levels always ensures compliance with basic restrictions. This was evaluated at several distances from different antennas (dipole, loop, slot, patch, and helix). Three power density definitions based on integration of the perpendicular real part of the Poynting vector, the real part of its three vector components, and its modulus were compared for averaging areas of $\lambda^2/16$, 4 cm^2 (below 30 GHz) and 1 cm² (30 GHz). In the reactive near-field $(d < \lambda/(2\pi))$, the transmitted power density can be underestimated if an antenna operates at the free space exposure limit. This underestimation may exceed 6 dB (4.0 times) and depends on the field source due to different coupling mechanisms. It is frequency-dependent for fixed-size averaging areas $(4 \text{ and } 1 \text{ cm}^2)$. At larger distances, transmission can be larger than the theoretical plane-wave transmission coefficient due to backscattering between the body and field source. Using the modulus of the incident Poynting vector yields the smallest underestimation. Bioelectromagnetics. 2020;41:348-359. © 2020 Bioelectromagnetics Society.

Keywords: millimeter wave exposure; incident power density; basic restrictions and reference levels: near-field coupling; compliance with exposure limits

Current Standards: IEC/IEEE 63195 Series of Standards

■ IEC/IEEE 63195-2 definitions include surface-normal real components sPDn+, all real components sPDtot+ or the modulus of the Poynting vector sPDmod+

$$
sPD(r_0) = \frac{1}{\hat{A}(r_0)} \int_{A(r_0)} \Re\{S(r)\} \cdot n_A(r) \cdot \Theta\big[\Re\{S(r)\} \cdot n_A(r)\big] d\hat{A}(r)
$$

$$
sPD(r_0) = \frac{1}{\hat{A}(r_0)}\int_{A(r_0)} \left\| \Re \left\{ S(r) \right\} \right\| \cdot \Xi \left\{ \cos^{-1} \left[n_R(r) \cdot n_A(r) \right] \right\} d\hat{A}(r)
$$

$$
sPD(r_0) = \frac{1}{\hat{A}(r_0)} \int_{A(r_0)} \left[\left(\left\| \Re \left\{ S(r) \right\} \right\| \cdot \Xi \left\{ \cos^{-1} \left[n_R(r) \cdot n_A(r) \right] \right\} \right)^2 + \left(\left\| \Im \left\{ S(r) \right\} \right\| \right)^2 \right]^{1/2} d\hat{A}(r)
$$

uncertainties arise due to evaluation of the incident field in free-space, i.e., due to the absence of the dielectric loading of the DUT by the body of the exposed subject

Normal Component is Poor Proxy of Exposure

- \blacksquare ratio of the transmitted to the incident psPD in homogeneous skin vs. free space calculated
- \blacksquare confinement of EM energy between the antenna and the exposed body leads to increased or lower exposure

Challenge 1:IPD in the Reactive Near-Field

Equivalent Source Reconstruction (ESR) Algorithm

- Implementation V3.x
	- based on distinct dipole sources
	- dipoles distributed in DUT based on field distribution and noise level
	- implemented in Python.
- Implementation V4.x \blacksquare
	- based on continuous dipole distribution
	- represented in a FEM mesh
	- refines mesh from corse parametrisation
	- implemented fully in C++

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Optimize (complex) amplitudes

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Measured E-field amplitudes ($|E_{pol}|$)

ESR V4.0

- Continuous dipole distribution represented by FEM mesh
- \blacksquare Starts with a corse parametrisation (corse and regular FEM mesh)
- \blacksquare Iterative approach:
	- Optimise parameters of mesh (same optimiser as ESRV1.x)
	- Refine FEM mesh (refinement techniques: Kelly, etc)
	- Use refined FEM mesh parameters as starting point for next optimisation
- No penalty in optimiser-cost-function for points below noise-threshold
- \blacktriangleright Solution can be propagated anywhere the FEM mesh surface.

IFA Antenna 6 GHz (2 min vs > ¹⁵ min)

2 mm from DUT

TargetpsPDn+: 934 W/m2/W

MeasuredpsPDn+: 1053.8 W/m2/W

Difference: 0.50 dB

5 mm from DUT

TargetpsPDn+: 672.5 W/m2/W

MeasuredpsPDn+: 599.1 W/m2/W

Difference: -0.50 dB

Slot Antenna 10GHz (4:25min vs > 15min)

2 mm from DUT

TargetpsPDn+: 1028 W/m2/W

5 mm from DUT

TargetpsPDn+: 762.2 W/m2/W

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MeasuredpsPDn+: 981 W/m2/W

Difference: -0.20 dB

MeasuredpsPDn+: 543.2 W/m2

Difference: -1.4 dB

Challenge 2: Device Conformal SAR, IPD

Challenge 2: Description

■ SAR phantom does not conform with device form factor

Specific Phantoms

- IEC/IEEE 62209-1528
- validation procedure is also defined

Challenge 2: Description

- \bullet evaluation of IPD in 2 mm distance from the device
- \blacksquare evaluation on the location of the phantom
- \bullet device surface is generally not a plane, e.g., camera module
- **none-flat phantoms, e.g., SAM phantom**

• Present guidance: RF Exposure scan on flat surface following the DUT profile

• New guidance tailored for consistency among several cases of devices with protrusions; includes Power Density test following protrusion profile at a given "probe safe" distance.

Interim Solution

- **EX measurement on planes above the camerally** module
- \blacksquare ESR in the phone
- susing advanced forward propagation
- evaluate IPD on each plane

Final Solution

- import CAD data
- ϵ evaluate IPD on the conformal surface

Challenge 3:Assessment of APD

Challenge 3: Recap of Science of mmWave Absorption

presented in detail last year

Basic Restrictions > 6 GHz

Notes to table:

- $-f_G$, A_{avg} , and t_{avg} are the frequency in GHz, the averaging area in cm² and the averaging time in minutes, respectively.
- The averaging area A_{avg} is in the shape of a square.
- $-$ * For IEEE, the 1 cm² psAPD limit applies only if the 3 dB contours around the peak are less than 1 cm^2 in size.
- Both the 4 cm² and 1 cm² psAPD limits apply above 30 GHz.
- for IEEE and ICNIRP, the whole body SAR limit of 0.08 W/kg (gen. public) or 0.4 W/kg (occup.) must be met at frequencies from 6 GHz to 300 GHz.
- For Canada, both the psAPD limits and psSAR limits (e.g., 1.6 W/kg for 1-gram average, for general public exposure at the head or torso) must be met if the frequency range of the communication system crosses 6 GHz (i.e., it has both a minimum frequency below 6 GHz and a maximum frequency above 6 GHz).
- EU does not presently have psAPD limits but is expected to adopt ICNIRP limits in the near future.
- USA does not presently have psAPD limits. However, it extends SAR measurements to frequencies up to 8.5 GHz including an IPD measurement at the configuration with the highest psSAR [16].
- Overcoming Regulatory Challenges, TCB Workshop, Baltimore, Oct 202423

Skin Anatomy

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Absorbed Power Density

- \geq > 6 GHz, EM energy is more localized in superficial tissues
	- SAR in 10-gram mass does not correlate well with temperature rise
	- APD is a better representation of temperature rise in superficial tissues
- \bullet definition of APD
	- energy flow per unit area directly under the body surface
	- based on Poynting vector

$$
S_{ab} = \iint_A \text{Re}[S] \cdot ds / A = \iint_A \text{Re}[E \times H^*] \cdot ds / A
$$

Research Projects to Solve Challenge 3

- **partners**
	- ETH Zurich
	- IT'IS Foundation
	- SPEAG
- \blacksquare Funding
	- Innosuisse
	- SEAWave
- *s* objectives
	- development of the basic science (appropriate skin model)
	- dosimetric scanning techniques (10 45 GHz)
	- fast techniques (10 300 GHz)

Proposed APD Assessment Methods

Challenge 3: Phantom for Skin

Sound Representation of the Skin in APD Assessment

*Christ A, Aeschbacher A, Rouholahnejad F, Samaras T, Tarigan B, Kuster N. Reflection properties of the human skin from 40 to 110 GHz: a confirmation study. Bioelectromagnetics. 2021 Oct;42(7):562-74.

FR2 APD Phantom

validated skin target modelmmW silicon phantom (CTIA)

 δ >5 mm (@30 GHz)

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PHA-30G Phantom 24 – ³⁰ GHz

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Challenge 3: Dosimetric Probe

Probe Design

- **E** vector field measurement in TSL
- frequency range: 10 GHz → 40 GHz
- \blacktriangleright isotropy error: < 0.8 dB
- linearity error: < 0.4 dB
- spatial resolution << penetration depth (0.5 mm^3)
- \bullet calibrated in TSL; calibration unc. \leq 0.6 dB
- wideband ≥ 800 MHz (modulation bandwidth)
- **Deta** low field perturbation (matched to TSL)

SPEAG's Implementation

- DASY8 Module APD of SPEAG
- PHA-30G APD phantom
- SSL-30G skin simulating liquid
- \bullet MD4APDV5 mounting device
- EUAPDV2 dosimetric mmW APD Probe
- **Module APD V1 software**
- *Verification Source 30 GHz V2*
- **probe/system support 10 45 GHz**
- \bullet band-specific phantoms to emulate skin
- \blacktriangleright FR2 24 30 GHz released in 4Q23
- FR3 10 15 (24) GHz release $4Q24$

APD Uncertainty Budget

Challenge 3: Validation

Validation Test Setup

- **pt63195-3 validation sources:**
	- horn slot array (HSA)
	- cavity back dipole array (CDA)
- ϵ d = 2 mm from skin
- **target data generated for mmW skin model**
- **E** measurements on SPEAG's PHA-30G

APD Validation Summary 6.5 – 30 GHz

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$$
|E_n| = \left| \frac{(psAPD_{meas}/psAPD_{sim} - 1)}{\sqrt{U_{sim}^2 + U_{meas}^2}}
$$

Absorbed Power Density Measurement System

Fariba Karimi, Member IEEE, Ninad Chitnis, Sven Kühn, Arya Fallahi, Senior Member IEEE, Andreas Christ, Member IEEE, and Niels Kuster, Fellow IEEE

Abstract-In this study, a new complete solution for the experimental assessment of the absorbed power density (APD) is developed that includes several novel components (i) probe, (ii) phantom, (iii) reconstruction, (iv) calibration and (v) validation. The described solution is optimized for the frequency range from 24 to 30 GHz, but can be extended to all frequency bands betwe 10 GHz and 45 GHz. The phantom emulates the reflection transmission coefficient of human skin for both proevanescent modes while increasing the penetration depth skin-simulating liquid (SSL) to enable the measureme the induced electromagnetic fields (EMFs) with a ne w miniaturized dosimetric broadband probe. The APD at the mantom surface is reconstructed from the measured field at 1mm distrnace from the surface. The calibration For the validation of the measurement system, a set of reference antennas with known numerical target values for the APD has also been designed. The validation demonstrates that the uncertainty is less than 1.x dB $(k = 2)$, the dynamic range is between $\langle 1\% \rangle$ and 500 times the general public exposure limits and the spatial resolution is < 0.5 mm³.

in the millimeter-wave (mmW) range, near-field exposure the absorption is confined to superficial which tissu tle at first, incident power density (IPD) [5] was nscudo dosimetric limit, IPD neglects the effects of use the hyman body on the transmitter (coupling, backscattering, etc.) and is a poor metric to assess the exposure in the near-field of sources [6]. Therefore, absorbed power density (APD) [1] or epithelial PD [2] averaged over a square area of 4 cm^2 for frequencies between $6 -30 \text{ GHz}$ and 1 cm^2 for frequencies above 30 GHz was introduced in the most recent safety guidelines in order to limit the maximum tissue heating (see Table ??). The relation of tissue heating as functions of peak APD, beam width, pulse repetition rate, environmental parameters and skin composition has recently be investigated by Neufeld et al. [7] showing that the proposed guidelines are not generally consistent but for all forseenable exposure szerarios of $5G$ and $6G$.

Challenge 3: Remaining Issues

- \bullet enhanced human study < 45 GHz
- \bullet skin model > 110 GHz
- phantoms for 40 GHz including validation sources
- **s** fast techniques

∆T Sensitivity

$t = 0.1 s$

- \blacksquare T-distribution correlates well with APD
- standing waves appear in phantom \blacksquare
- $\triangle T \leq$ thermal camera sensitivity

t = 60 s

- $\triangle T$ > thermal camera sensitivity
- **but lacks correlation with APD**

Challenge 3: APD Regulatory Update

IEC TC106 WG12

- IEC PAS 63446:2022 (6 10 GHz)
	- published
- \blacksquare IEC/IEEE TR 63572:2024 ED1 (6 300 GHz)
	- CD circulated, comments due 2024-05-17
	- inter-laboratory comparison:
	- inter-laboratory equipment and procedures available
	- planned start postponed from 05/2024 to 09/2024
- \blacksquare IEC/IEEE pt63195-3 (6 300 GHz)
	- development started in 1Q24
	- very first draft discussed in Kista meeting (05/24)

China

- ICNIRP 2020 APD adoption
- domestic product test standard under development
- planned release by end 2025

Canada, Australia, Japan

 \blacksquare ICNIRP2020 APD adoption $(6 - 10 \text{ GHz})$

Challenge 4:Comprehensive but Agnostic Validation

Regulatory / Standardization Gap

- **EXEC/IEEE 62209-1528**
	- performance standard
	- defines the performance requirements of the system
	- defines the performance requirements of subcomponents (probe, liquid, phantom and scanning procedure)
	- defines rigorous validation of each subcomponent
	- $-$ tight compliance criteria (deviation from target $\leq \pm 10\%)$
- **new IEC/IEEE 62209-3**
	- only a few tests (while system degree of freedom is high)
	- $-$ soft compliance criteria (deviation from target \pm 45%)
	- system can be tuned to meet criteria for only test conditions
- validation is not comparable / equivalence cannot be demonstrated

Equivalence

- **F** if validation system is common and measurement system agnostic and
- **F** if the validation procedures is comprehensive to ensure that all systems provides results within \pm 30% of the true value
- the systems are equivalent with respect to the requirement of \pm 30%
- open issue: configuration dependent offsets between system type – regulators interpretation issue

Indian TestLab Phone Study (2 Array Systems vs Scanning System)

- **probe scanning system compared to two** commercially-available vector measurementbased systems
- \blacksquare array system 1 (blue) vs probe scanning system
	- min: -1.0 dB
	- max: +1.0 dB
	- std. dev.: 0.4 dB
	- average: -0.1 dB
	- 100% of results within combined uncertainty
- **E** array system 2 (red) vs probe scanning system
	- min: -5.9 dB
	- max: +2.2 dB
	- std. dev.: 1.2 dB
	- average: -1.3 dB
	- 44% of results within combined uncertainty
- organized by IT'IS

T. Nagaoka et al., BioEM, 2024 (NICT Japan)

- DASY 6, cSAR3D, ART-MAN v2
- 3 smartphones capable of transmitting in test mode
- **s** only LTE bands
- ≈ 400 conditions
- **s** one fast SAR measurement system is generally within the expanded uncertainty of the full SAR and fast SAR measurement systems
- \bullet the other fast SAR measurement system has many conditions that are outside of its expanded uncertainty range
- \bullet we are continuing the SAR measurements in this study for more DUTs and conditions

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Comparison of Measured SARs between Full and Fast SAR Measurement Systems Using Various Smartphones

Dr Tomoaki Nagaoka, Dr Yuto Shimizu, Mr Hiroshi Kawakami National Institute of Information and Communications Technology, Koganei, Japan

Abstract Subject Area(s)

["RF/Microwave","Standards and public health policy"]

Summary

Fast SAR measurment systems are currently used primarily for screening, but are expected to be adopted for compliance testing in the future. Recent research comparing SAR values from over 8,000 conditions on 80 different commercially availablesmartphones using two fast SAR measurement systems revealed significant differences likely influenced by the DUTs. In this study, SAR values from both conventional and fast systems were compared using smartphones in test mode in order to climinate DUT-induced discrepancies.

Is the work in progress?

yes

Full abstract

Download file

T. Nagaoka et al., BioEM, 2024 (NICT Japan)

Regulatory / Standardization Gap

- **EXEC/IEEE** standard
	- performance standard without method and specifying component specifications (incl. open and blackbox systems)
	- only performance requirements: all configurations must be assessed within \pm 30% of the true value
	- how can this be demonstrated / validated?!

Objectives of Validation Concept

- **EX** common validation procedure for any system
- conclusive demonstration that SAR measurement system performs within manufacturer's stated measurement uncertainty $-$ not exceeding \pm 30%
- **Paramed by the user at least annually**
	- including after hardware or software changes, recalibration, or installation of new system
- ensures reliable and reproducible measurements
- any system passing this validation can be considered equivalent

Validation Requirements

- **E** universally applicable to any SAR measurement system
	- agnostic to measurement methodology, implementation and system
	- reduced scope (e.g., frequency)
- **EXECUTE:** tests shall be equivalent to evaluating all exposure conditions
	- millions of tests
- **a** affordability (max $2 3$ days)
- \blacksquare statistical approach
	- based on latest from surrogate modeling
	- $-$ reduction to \sim 200 400 randomly selected cases
	- critical data space search based on model validation results
- \bullet test reduction
	- test not falling within the scope of the system (e.g., frequency)
	- redundant tests can be skipped, if it can be demonstrated that tests are equivalent
- open software available to support selection and interpretation

Received 15 February 2024, accepted 6 April 2024, date of publication 25 April 2024, date of current version 3 May 2024. Digital Object Identifier 10.1109/ACCESS.2024.3393778

RESEARCH ARTICLE

A Gaussian Process Based Approach for Validation of Multi-Variable **Measurement Systems: Application to SAR Measurement Systems**

CÉDRIC BUJARD^{®1}, ESRA NEUFELD^{®1}, MARK DOUGLAS^{®1}, (Senior Member, IEEE), JOE WIART^{®2}, (Senior Member, IEEE), AND NIELS KUSTER^{®1,3}, (Fellow, IEEE) ¹IT'IS Foundation, 8004 Zürich, Switzerland ²Laboratoire de Traitement et Communication de l'Information (LTCI), C2M, Télécom Paris, 91120 Paris, France

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This work was supported by the European Union's Horizon Europe Framework Programme under Grant Agreement number 101057622 (Project "Scientific-based Exposure and risk Assessment of radiofrequency and mm-Wave systems from children to elderly (5G and Beyond)"-SEAWave), and by the Swiss State Secretariat for Education, Research and Innovation (SERI).

ABSTRACT Resource-efficient and robust validation of systems designed to measure a multi-dimensional parameter space is an unsolved problem as it would require millions of test permutations for comprehensive validation coverage. In the paper, an efficient and comprehensive validation approach based on a Gaussian

Compliant and Equivalence

- a system is declared non-compliant if it fails validation
	- if multiple validations are performed to achieve a better coverage of the parameters space, all of them must pass
- all systems that pass are compliant and equivalent
- system provider problem
	- as tests performed by the lab is not known, they have to make sure that the system passes all of the million of tests

[1] Bujard C, Neufeld E, Douglas M, Wiart J, Kuster N. A Gaussian process based approach for validation of multi-variable measurement systems: application to SAR measurement systems. IEEE Access. 2024 Apr 25.

Implementation by 62209-5

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Challenge 4: Remaining Issues

- solution known
- \bullet deadlock for fast SAR system within reach
- **F** implementation not done yet
- challenge to define test reduction to make it affordable

Challenge 5: Evaluation of Exposure Mitigation Features

Regulatory / Standardization Gap

- communication requirements for smart phones increasing
	- high data rate, lower latency, higher reliability
	- more bands
	- more simultaneous transmission
- **F** more demanding test conditions
	- separation distance (d) = 0 mm
	- hand SAR (ISED)
- smart phones are getting much smarter
	- time average SAR
	- proximity sensors
	- motion sensors
	- position sensors
	- use case differentiation

Research Project TyProxi

- **Filter** IT'IS Foundation
- **Partners**
	- ETH Zurich
	- SEMTECH
- **F**unding
	- InnoSuisse

Results

- *m* human study
- surrogate phantoms for capacitance-based sensors determined
- **EXECUTE: EVALUATION OF FINGERY STARK** PHANTOM
- procedures of the latest IEC standards
	- IEC TR 63424-1
	- IEC/IEEE 62209-1528 Amendment 1
- 6 test sequences defined in standards
	- **continuous: away from phantom**
	- continuous: toward phantom
	- stepwise: away from phantom
	- stepwise: toward phantom
	- quasi-static
	- dynamic

Sequence — Continuous Away

Sequence — Continuous Toward

Sequence — In Steps

Sequence — Quasi-Static Test

Challenge 5: Remaining Issues

- **PEDICITE:** proximity sensors evaluation according to standard
	- automated system
	- efficient and comprehensive
	- also when combined w/ TAS
	- different angles
	- prepared to measure power control for approaching fingers (standardization lacking)
- **F** motion sensors
- \blacksquare testing of combinations of multiple features

Status Summary of Scientific Challenges

- 1: assessment of IPD in the reactive near-field – novel, robust ESR close to completion
- 2: surface conformal IPD
	- fundamentals solved, waiting for 1
- 3: assessment of APD
	- 24 30 GHz done
	- 10 20 GHz fundamentals resolved
	- 40 GHz within reach
	- fast APD fundamentals still being addressed
- 4: comprehensive but agnostic validation systems
	- scientifically solved, now within IEC
- 5: evaluation of exposure mitigation features (TA, spatial diversity, proximity, motion, etc.)
	- automated testing of proximity sensors combined with TA according to standard resolved
	- major challenges for motion sensors and further techniques for exposure mitigations still unresolved

- **For female scientists** in the fields of electromagnetics and information technology
- Deadline: **April 30, 2025**, 23:59h Swiss local time
- Contact: <u>kpresearchfund@itis.swiss</u>

ellowships/katia-pokovicresearch-fund/ research-fellowships

