



SAR EVALUATION REPORT

Applicant Name:

 TSI Incorporated
 500 Cardigan Road
 Shoreview, Minnesota 55126 USA

Date of Testing:

03/28/23 – 04/05/23

Test Site/Location:

 Element Washington DC LLC,
 Columbia, MD, USA
 Lab Code: 2451B

Document Serial No.:

1M2303240040-01-R2.2A22J

FCC ID:	2A22JOTSTATION
IC:	28101- OTSTATION
APPLICANT:	TSI INCORPORATED

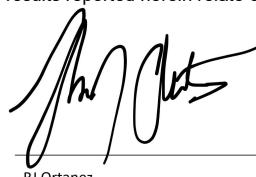
DUT Type/Apparatus/Device:	Portable Handheld Device
Application Type:	Certification
FCC Rule Part(s):	CFR §2.1093
IC Specification(s):	RSS-102 Issue 5 (March 2015), Health Canada Safety Code 6
Additional Standard(s)	IEC/IEEE 62209-1528:2020
Radio Equipment Type(s):	Bluetooth, and Wi-Fi Device
Model(s)/HVIN:	TSI SMART STATION

Equipment Class	Band & Mode	Tx Frequency	SAR	
			1g Body (W/kg)	10g Extremity (W/kg)
DTS	2.4 GHz WLAN	2412 - 2462 MHz	0.32	0.16
DSS/DTS	Bluetooth Low Energy	2402 - 2480 MHz	< 0.1	< 0.1
Simultaneous SAR per KDB 690783 D01v01r03:			0.36	0.17

Note: This revised Test Report (S/N: 1M2303240040-01-R2.2A22J) supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.9 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.



 RJ Ortanez
 Executive Vice President


CERT #2041.01

The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: sartick@mwfai.info.

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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz WLAN	Data	2412 - 2462 MHz
Bluetooth Low Energy	Data	2402 - 2480 MHz

1.2 Power Reduction for SAR

There is no power reduction used for any band mode implemented in this device for SAR purposes.

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1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

1.3.1 2.4 GHz Maximum WLAN Output Power

Mode	Band	IEEE 802.11 (in dBm)					
		b		g		n	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
2.4 GHz WIFI	2.45 GHz	14.0	12.0	14.0	12.0	14.0	12.0

1.3.2 2.4 GHz Maximum Bluetooth Low Energy Output Power

Mode	Single Antenna	
	Maximum	Nominal
Bluetooth LE 1Mbps/2Mbps/125 kbps/500 kbps (in dBm)	-1.5	-3.5

1.4 DUT Antenna Locations

A diagram showing the location of the device antennas can be found in Appendix F

Table 1-1
Device Edges/Sides for SAR Testing

Device Sides/Edges for SAR Testing						
Mode	Back	Front	Top	Bottom	Right	Left
2.4 GHz WLAN	Yes	Yes	Yes	No	No	Yes
Bluetooth Low Energy	Yes	Yes	Yes	No	No	Yes

Note: Particular DUT edges were not required to be evaluated for SAR Per KDB Publication 941225 D07v01r02, UMPC mini-tablet devices must be tested for all surfaces and edges ≤ 25 mm from a transmitting antenna.

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1.5 Simultaneous Transmission Capabilities

According to FCC KDB Publication 447498 D01v06, transmitters are considered to be operating simultaneously when there is overlapping transmission, with the exception of transmissions during network hand-offs with maximum hand-off duration less than 30 seconds.

This device contains multiple transmitters only when used with an accessory device described in Test Report Serial No 1M2303240040-02-R1.2A22J that may operate simultaneously, and therefore requires a simultaneous transmission analysis according to FCC KDB Publication 447498 D01v06 6.4 procedures. See section 12 for simultaneous SAR considerations.

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1.6 Guidance Applied

- IEEE 1528-2013
- IEC/IEEE 62209-1528:2020
- RSS-102 Issue 5 (March 2015), Health Canada Safety Code 6
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)
- FCC KDB Publication 248227 D01v02r02 (SAR Considerations for 802.11 Devices)
- FCC KDB Publication 447498 D01v06 (General SAR Guidance)
- FCC KDB Publication 941225 D07v01r02 (UMPC Mini-Tablet Devices)

1.7 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 11.

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2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

2.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

Equation 2-1
SAR Mathematical Equation

$$SAR = \frac{d}{dt} \left(\frac{dU}{dm} \right) = \frac{d}{dt} \left(\frac{dU}{\rho dv} \right)$$

SAR is expressed in units of Watts per Kilogram (W/kg).

$$SAR = \frac{\sigma \cdot E^2}{\rho}$$

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m³)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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3 SAR MEASUREMENT SETUP

3.1 Robotic System

Measurements are performed using the DASY5 automated dosimetric assessment system. The DASY5 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of a high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the SAM phantom containing the head or body equivalent material. The robot is a six-axis industrial robot, performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Figure 3-1).

3.2 System Hardware

A cell controller system contains the power supply, robot controller, teach pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the SAR Measurement Software DASY52, A/D interface card, monitor, mouse, and keyboard. The Staubli Robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, A/D conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal from the DAE and transfers data to the PC card.

3.3 System Electronics

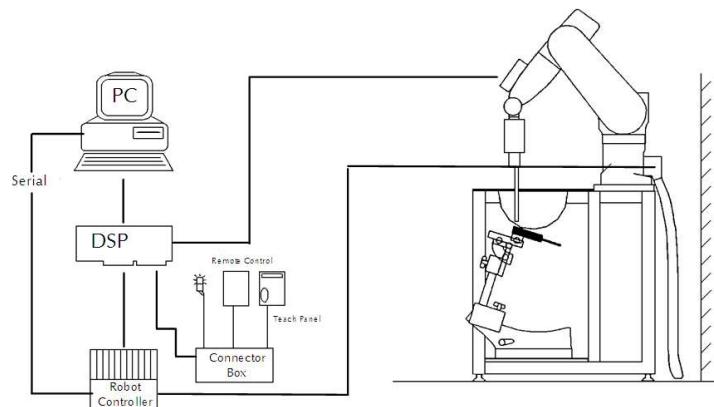


Figure 3-1
SAR Measurement System Setup

The DAE consists of a highly sensitive electrometer-grade auto-zeroing preamplifier, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer.

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3.4 Automated Test System Specifications

Test Software: SPEAG DASY52 version 52.8 Measurement Software and SPEAG DASY6 version 6.16 Measurement Software
 Robot: Stäubli Unimation Corp. Robot RX60L, Robot TX90XL
 Repeatability: 0.02 mm
 No. of Axes: 6

Data Acquisition Electronic System (DAE)

Data Converter

Features: Signal Amplifier, multiplexer, A/D converter & control logic
 Software: SEMCAD X software
 Connecting Lines: Optical Downlink for data and status info
 Optical upload for commands and clock

PC Interface Card

Function: Link to DAE
 16-bit A/D converter for surface detection system
 Two Serial & Ethernet link to robotics
 Direct emergency stop output for robot

Phantom

Type: SAM Twin Phantom (V4.0/5.0)/ ELI V4.0/5.0/6.0
 Shell Material: Composite

Thickness: 2.0 ± 0.2 mm



Figure 3-2
SAM Phantoms

The SAM Twin Phantom V4.0 and V5.0 is constructed of a fiberglass shell integrated in a table. The shape of the shell is based on data from an anatomical study designed to represent the 90th percentile of the population. The phantom enables the dosimetric evaluation of SAR for both left and right handed handset usage, as well as body-worn usage using the flat phantom region. Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. The shell phantom has a 2 mm shell thickness (except the ear region where shell thickness increases to 6 mm).

ELI is constructed of a fiberglass shell and can be integrated into standard phantom tables. ELI Phantom is made for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC/IEEE 62209-1528:2020 standard and all known tissue simulating liquids. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The shell phantom has a 2 mm shell thickness.



Figure 3-3
ELI Phantoms

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4 DOSIMETRIC ASSESSMENT

4.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04, IEC/IEEE 62209-1528:2020, and IEEE 1528-2013:

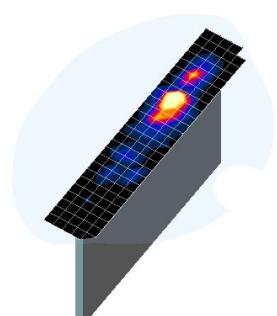
1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 4-1) and, IEC/IEEE 62209-1528:2020, IEEE 1528-2013.
 
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 4-1), IEC/IEEE 62209-1528:2020, and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):
 - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 4-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points ($10 \times 10 \times 10$) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

Table 4-1
Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{area}, \Delta y_{area}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{zoom}, \Delta y_{zoom}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid		Graded Grid	
			$\Delta z_{zoom}(n)$	$\Delta z_{zoom}(1)^*$	$\Delta z_{zoom}(n>1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5* $\Delta z_{zoom}(n-1)$	≥ 22

*Also compliant to IEEE 1528-2013 Table 6 and IEC/IEEE 62209-1528:2020 Table 4

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5 DASY E-FIELD PROBE SYSTEM

5.1 Probe Measurement System



Figure 5-1
SAR System

The SAR measurements were conducted with the dosimetric probe designed in the classical triangular configuration (see Figure 5-3) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multi-fiber line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY5 software reads the reflection during a software approach and looks for the maximum using a 2nd order curve fitting. The approach is stopped at reaching the maximum.

5.2 Probe Specifications

Model(s):	ES3DV2, ES3DV3, EX3DV4
Frequency Range:	10 MHz – 6.0 GHz (EX3DV4) 10 MHz – 4 GHz (ES3DV3, ES3DV2)
Calibration:	In head and body simulating tissue at Frequencies from 300 up to 6000MHz
Linearity:	± 0.2 dB (30 MHz to 6 GHz) for EX3DV4 ± 0.2 dB (30 MHz to 4 GHz) for ES3DV3, ES3DV2
Dynamic Range:	10 mW/kg – 100 W/kg
Probe Length:	330 mm
Probe Tip Length:	20 mm
Body Diameter:	12 mm
Tip Diameter:	2.5 mm for EX3DV4, 3.9mm for ES3DV3, ES3DV2



Figure 5-2
Near-Field Probe



Figure 5-3
Triangular Probe Configuration

Tip-Center: 1 mm for EX3DV4, 2.0 mm for ES3DV3, ES3DV2

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6 TEST CONFIGURATION POSITIONS

6.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$. phantom in a normal use configuration.

6.2 UMPC Mini-Tablet Configurations

Small hand-held tablets (and devices of similar form factors that are designed primarily for interactive hand-held use next to or near the body of users) require body SAR and extremity SAR evaluation. These types of mini-tablets are normally optimized for mobile web access and multimedia use. UMPC test procedures are applicable for devices with displays and overall diagonal dimension ≤ 20 cm. Devices are to be set up according to KDB publication 941225 D07v01r02 requirements and are configured with maximum output power during SAR assessment for a worst case SAR evaluation.

Per KDB Publication 941225 D07v01r02, UMPC mini-tablet devices must be tested for all surfaces and edges ≤ 25 mm from a transmitting antenna. A test separation distance of 0 mm was used for 1g SAR and 10g SAR to address hand and body exposure.

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7 RF EXPOSURE LIMITS

7.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

7.2 Controlled Environment

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 7-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population (W/kg) or (mW/g)</i>	CONTROLLED ENVIRONMENT <i>Occupational (W/kg) or (mW/g)</i>
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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8 MEASUREMENT PROCEDURES

8.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

8.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations of 802.11 transmitters are not suitable for SAR measurements. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 D01v02r02 for more details.

8.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters.

A periodic duty factor is required for current generation SAR systems to measure SAR. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

8.2.2 2.4 GHz SAR Test Requirements

SAR is measured for 2.4 GHz 802.11b DSSS using either the fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:

- 1) When the reported SAR of the highest measured maximum output power channel for the exposure configuration is $\leq 0.8 \text{ W/kg}$, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- 2) When the reported SAR is $> 0.8 \text{ W/kg}$, SAR is required for that position using the next highest measured output power channel. When any reported SAR is $> 1.2 \text{ W/kg}$, SAR is required for the third channel; i.e., all channels require testing.

2.4 GHz 802.11 g/n OFDM are additionally evaluated for SAR if the highest reported SAR for 802.11b, adjusted by the ratio of the OFDM to DSSS specified maximum output power, is $> 1.2 \text{ W/kg}$. When SAR is required for OFDM modes in 2.4 GHz band, the Initial Test Configuration Procedures should be followed. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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8.2.3 OFDM Transmission Mode and SAR Test Channel Selection

When the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11n or 802.11g and 802.11n with the same channel bandwidth, modulation and data rate etc., the lower order 802.11 mode i.e., 802.11g then 802.11n, is used for SAR measurement. When the maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

8.2.4 Initial Test Configuration Procedure

For OFDM, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order IEEE 802.11 mode. The channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is ≤ 0.8 W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is ≤ 1.2 W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements (See Section 8.2.3). When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

8.2.5 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is ≤ 1.2 W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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9 RF CONDUCTED POWERS

9.1 WLAN Conducted Powers

Table 9-1
2.4 GHz WLAN Maximum Average RF Power

2.4GHz Conducted Power [dBm]					
Freq [MHz]	Channel	IEEE Transmission Mode			
		802.11b	802.11g	802.11n	
		Average	Average	Average	
2412	1	12.21	12.08	11.64	
2437	6	12.19	11.60	11.12	
2462	11	12.20	11.89	11.40	

Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with the same maximum output power specification, powers were measured for the largest channel bandwidth, lowest order modulation and lowest data rate.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.
- For each transmission mode configuration, powers were measured for the highest and lowest channels; and at the mid-band channel(s) when there were at least 3 channels supported. For configurations with multiple mid-band channels, due to an even number of channels, both channels were measured.

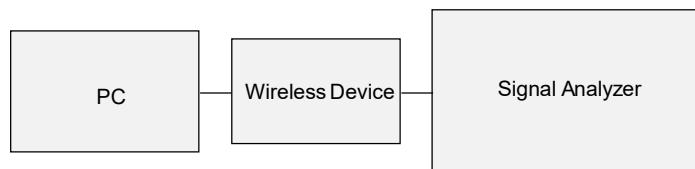


Figure 9-1
Power Measurement Setup

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9.2 Bluetooth Conducted Powers

Table 9-2
Bluetooth Maximum Average RF Power

Frequency [MHz]	Data Rate [Mbps]	Channel No.	Bluetooth Mode	Peak Conducted Power	
				[dBm]	[mW]
2402	125 kbps	0	LE	-3.43	0.454
2440	125 kbps	19	LE	-3.20	0.479
2480	125 kbps	39	LE	-3.07	0.493
2402	500 kbps	0	LE	-3.46	0.451
2440	500 kbps	19	LE	-3.20	0.479
2480	500 kbps	39	LE	-3.03	0.498
2402	1 Mbps	0	LE	-3.49	0.448
2440	1 Mbps	19	LE	-3.25	0.473
2480	1 Mbps	39	LE	-3.04	0.497
2402	2 Mbps	0	LE	-3.43	0.454
2440	2 Mbps	19	LE	-3.29	0.469
2480	2 Mbps	39	LE	-3.09	0.491

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Figure 9-2
Bluetooth Transmission Plot



Equation 9-1
Bluetooth Duty Cycle Calculation

$$Duty\ Cycle = \frac{Pulse\ Width}{Period} * 100\% = \frac{0.725ms}{1.245ms} * 100\% = 58.2\%$$

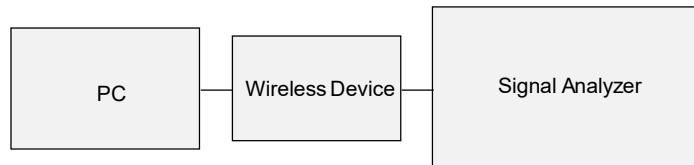


Figure 9-3
Power Measurement Setup

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10 SYSTEM VERIFICATION

10.1 Tissue Verification

Table 10-1
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ϵ	% dev σ	% dev ϵ
03/28/2023	2450 Head	20.9	2300	1.700	39.241	1.670	39.500	1.80%	-0.66%
			2310	1.707	39.224	1.679	39.480	1.67%	-0.65%
			2320	1.714	39.204	1.687	39.460	1.60%	-0.65%
			2400	1.775	39.088	1.756	39.289	1.08%	-0.51%
			2450	1.816	39.012	1.800	39.200	0.89%	-0.48%
			2480	1.839	38.977	1.833	39.162	0.33%	-0.47%
			2500	1.855	38.947	1.855	39.136	0.00%	-0.48%
			2510	1.863	38.930	1.866	39.123	-0.16%	-0.49%
			2535	1.885	38.890	1.893	39.092	-0.42%	-0.52%
			2550	1.899	38.870	1.909	39.073	-0.52%	-0.52%
			2560	1.908	38.859	1.920	39.060	-0.63%	-0.51%
			2600	1.938	38.817	1.964	39.009	-1.32%	-0.49%
			2650	1.977	38.718	2.018	38.945	-2.03%	-0.58%
			2680	2.000	38.664	2.051	38.907	-2.49%	-0.62%
			2700	2.015	38.619	2.073	38.882	-2.80%	-0.68%
04/05/2023	2450 Head	22.4	2300	1.721	39.097	1.670	39.500	3.05%	-1.02%
			2310	1.727	39.083	1.679	39.480	2.86%	-1.01%
			2320	1.734	39.064	1.687	39.460	2.79%	-1.00%
			2400	1.792	38.936	1.756	39.289	2.05%	-0.90%
			2450	1.830	38.826	1.800	39.200	1.67%	-0.95%
			2480	1.854	38.792	1.833	39.162	1.15%	-0.94%
			2500	1.869	38.779	1.855	39.136	0.75%	-0.91%
			2510	1.875	38.766	1.866	39.123	0.48%	-0.91%
			2535	1.893	38.712	1.893	39.092	0.00%	-0.97%
			2550	1.906	38.675	1.909	39.073	-0.16%	-1.02%
			2560	1.915	38.655	1.920	39.060	-0.26%	-1.04%
			2600	1.946	38.630	1.964	39.009	-0.92%	-0.97%
			2650	1.982	38.520	2.018	38.945	-1.78%	-1.09%
			2680	2.009	38.476	2.051	38.907	-2.05%	-1.11%
			2700	2.026	38.474	2.073	38.882	-2.27%	-1.05%

Note: All frequencies were measured to be within 5% of targets listed in IEC/IEEE 62209-1528:2020. Per IEC/IEEE 62209-1528:2020, since the dielectric properties of the tissue simulating are all equal or less than 5% of the target values, SAR was not scaled. The measurement uncertainty of 5% for deviation of conductivity and liquid permittivity from the target was added to the uncertainty budget in Section 13.2

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Per April 2019 TCB Workshop notes, single head-tissue simulating liquid specified in IEC 62209-1 is permitted to use for all SAR tests.

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10.2 Test System Verification

Prior to SAR assessment, the system is verified to $\pm 10\%$ of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in the SAR System Validation Appendix E.

Table 10-2
System Verification Results

System Verification TARGET & MEASURED																	
SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	DAE	Measured SAR 1g (W/kg)	1W Target SAR 1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation 1g (%)	Measured SAR 10g (W/kg)	1W Target SAR 10g (W/kg)	1W Normalized SAR 10g (W/kg)	Deviation 10g (%)
O	2450	HEAD	03/28/2023	20.5	20.9	0.10	981	7570	1558	5.060	53.900	50.600	-6.12%	2.360	25.400	23.600	-7.09%
O	2450	HEAD	04/05/2023	22.9	22.4	0.10	981	7570	1558	4.950	53.900	49.500	-8.16%	2.310	25.400	23.100	-9.06%

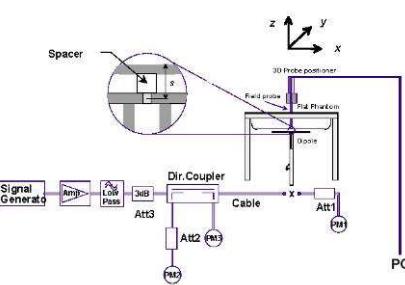


Figure 10-1
System Verification Setup Diagram



Figure 10-2
System Verification Setup Photo

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11 SAR DATA SUMMARY

11.1 Standalone Body/Extremity SAR Data

Table 11-1
DTS WLAN Body/Extremity SAR

MEASUREMENT RESULTS																			
FREQUENCY		Side	Spacing	Mode	Service	Device Serial Number	Bandwidth [MHz]	Data Rate (Mbps)	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Power Drift [dB]	Duty Cycle (%)	SAR (1g)	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Reported SAR (1g)	SAR (10g)	Reported SAR (10g)	Plot #
MHz	Ch.												(W/kg)	(W/kg)	(W/kg)	(W/kg)			
2412	1	back	0 mm	802.11b	DSSS	00070	22	1	14.0	12.21	-0.03	100.00	0.147	1.510	1.000	0.222	0.078	0.118	
2412	1	front	0 mm	802.11b	DSSS	00070	22	1	14.0	12.21	0.03	100.00	0.103	1.510	1.000	0.156	0.054	0.082	
2412	1	top	0 mm	802.11b	DSSS	00070	22	1	14.0	12.21	0.02	100.00	0.035	1.510	1.000	0.053	0.020	0.030	
2412	1	left	0 mm	802.11b	DSSS	00070	22	1	14.0	12.21	-0.03	100.00	0.202	1.510	1.000	0.305	0.101	0.153	
2437	6	left	0 mm	802.11b	DSSS	00070	22	1	14.0	12.19	0.02	100.00	0.211	1.517	1.000	0.320	0.105	0.159	A1
2462	11	left	0 mm	802.11b	DSSS	00070	22	1	14.0	12.20	-0.01	100.00	0.189	1.514	1.000	0.286	0.093	0.141	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population										Body 1.6 W/kg (mW/g), 4.0 W/kg (mW/g) averaged over 1 gram, 10 gram									

Table 11-2
DSS Body/Extremity SAR

MEASUREMENT RESULTS																			
FREQUENCY		Side	Spacing	Mode	Service	Device Serial Number	Data Rate (kbps)	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Power Drift [dB]	Maximum Duty Cycle (%)	Duty Cycle (%)	SAR (1g)	Scaling Factor (Cond Power)	Scaling Factor (Duty Cycle)	Reported SAR (1g)	SAR (10g)	Reported SAR (10g)	Plot #
MHz	Ch.												(W/kg)	(W/kg)	(W/kg)	(W/kg)	(W/kg)		
2480	39	back	0 mm	Bluetooth LE	DSSS	00070	125	-1.50	-3.07	0.03	100.00	58.20	0.000	1.436	1.718	0.000	0.000	0.000	
2480	39	front	0 mm	Bluetooth LE	DSSS	00070	125	-1.50	-3.07	0.00	100.00	58.20	0.000	1.436	1.718	0.000	0.000	0.000	
2480	39	top	0 mm	Bluetooth LE	DSSS	00070	125	-1.50	-3.07	0.07	100.00	58.20	0.000	1.436	1.718	0.000	0.000	0.000	
2480	39	left	0 mm	Bluetooth LE	DSSS	00070	125	-1.50	-3.07	0.03	100.00	58.20	0.000	1.436	1.718	0.000	0.000	0.000	A2
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population										Body 1.6 W/kg (mW/g), 4.0 W/kg (mW/g) averaged over 1 gram, 10 gram									

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11.2 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
2. Per RSS-102, Issue 5 Section 3, SAR evaluations were made in accordance with the latest version of IEC/IEEE 62209-1528:2020. FCC KDB Publications listed in RSS-102 were used to supplement the limited technology specific testing protocols described in the international standards.
3. Batteries are fully charged at the beginning of the SAR measurements.
4. Liquid tissue depth was at least 15.0 cm for all frequencies.
5. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
6. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
7. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg for 1g SAR and less than 2.0 W/kg for 10g SAR. Please see Section 12 for variability analysis.
8. Unless otherwise noted, when 10g SAR measurement is considered, a factor of 2.5 is applied to the 1g thresholds for the equivalent test cases.
9. Per FCC KDB Publication 941225 D07v01r02, this device is considered a "UMPC mini-tablet". UMPC body 1g SAR tests are required on all surfaces and edges \leq 25 mm from a transmitting antenna. Therefore, to address hand exposure, UMPC extremity 10g SAR tests are required at a test separation distance of 0 mm.

WLAN Notes:

1. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 2.4 GHz WIFI single transmission chain operations, the highest measured maximum output power channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4 GHz 802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSS SAR. See Section 8.2.2 for more information.
2. When the maximum reported 1g averaged SAR is \leq 0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was \leq 1.20 W/kg for 1g evaluations or all test channels were measured.
3. The device was configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated EMC test reports.
4. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

Bluetooth Notes

1. Per October 2016 TCB Workshop Notes, the reported SAR was scaled to the 100% transmission duty factor to determine compliance. See Section 9 for the time domain plot and calculation for the duty factor of the device.

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12 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

12.1 Introduction

The following procedures adopted from FCC KDB Publication 447498 D01v06 are applicable to devices with after-market accessories. Separate equipment approval is required for accessories containing transmitter(s) that are available from the host manufacturer. If the transmitter in the accessory supports standalone operations, with or without the host equipment, both conditions must be evaluated for RF exposure compliance. The connection between the two devices is mechanical and does not have an electrical component. This device (TSI Smart Station) is intended to be used with the device associated in Test Report Serial No 1M2303240040-02-R1.2A22J (7591-04). When simultaneous transmission applies, all transmitter combinations must be addressed for the accessory alone and also with the accessory operating in conjunction with the host equipment.

12.2 Simultaneous Transmission Procedures

This device (TSI Smart Station) contains transmitters that may operate simultaneously with after-market accessories (7591-04). Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication, 447498 D01v06 4.3.2, IEEE 1528-2013 Section 6.3.4.1.2, and IEC/IEEE 62209-1528:2020 Section 7.4.4 simultaneous transmission SAR test exclusion may be applied when the sum of the 1g SAR for all the simultaneous transmitting antennas in a specific physical test configuration is ≤ 1.6 W/kg for 1g SAR and ≤ 4.0 W/kg for 10g SAR. The different test positions in an exposure condition may be considered collectively to determine SAR test exclusion according to the sum of 1g or 10g SAR.

12.3 Body SAR Simultaneous Transmission Analysis

Table 12-1
Simultaneous Transmission Scenario with 2.4 GHz WLAN and Bluetooth Low Energy Body - 1g

Configuration	TSI Smart Station WLAN (W/kg)	PM +tVOC-PID BLE (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Body SAR	0.320	0.037	0.357

Table 12-2
Simultaneous Transmission Scenario with Bluetooth Low Energy Body - 1g

Configuration	TSI Smart Station BLE (W/kg)	PM +tVOC-PID BLE (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Body SAR	0.000	0.037	0.037

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12.4 Extremity SAR Simultaneous Transmission Analysis

Table 12-3
Simultaneous Transmission Scenario with 2.4 GHz WLAN and Bluetooth Low Energy 12.4 Extremity - 10g

Configuration	TSI Smart Station WLAN (W/kg)	PM +tVOC-PID BLE (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Extremity SAR	0.159	0.012	0.171

Table 12-4
Simultaneous Transmission Scenario with Bluetooth Low Energy 12.4 Extremity - 10g

Configuration	TSI Smart Station BLE (W/kg)	PM +tVOC-PID BLE (W/kg)	Σ SAR (W/kg)
	1	2	1+2
Extremity SAR	0.000	0.012	0.012

12.5 Simultaneous Transmission Conclusion

The above numerical summed SAR results analysis are sufficient to determine that simultaneous transmission cases will not exceed the SAR limit and therefore no measured volumetric simultaneous SAR summation is required per FCC KDB Publication 447498 D01v06, IEEE 1528- 2013 Section 6.3.4.1, and IEC/IEEE 62209-1528:2020 Section 7.4.4.2.

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13 SAR MEASUREMENT VARIABILITY

13.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was assessed for each frequency band, since all measured SAR values are < 0.80 W/kg for 1g SAR and < 2.0 W/kg for 10g SAR.

13.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g and <3.75 W/kg for 10g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 and IEC/IEEE 62209-1528:2020 was not required.

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14 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	E4404B	Spectrum Analyzer	N/A	N/A	N/A	MY45113242
Agilent	N5182A	MXG Vector Signal Generator	7/4/2022	Annual	7/4/2023	MY48180366
Agilent	8753ES	S-Parameter Vector Network Analyzer	6/14/2022	Annual	6/14/2023	US39170118
Amplifier Research	150A100C	Amplifier	CBT	N/A	CBT	350132
Anritsu	MA2411B	Pulse Power Sensor	10/20/2022	Annual	10/20/2023	1339018
Mini-Circuits	PWR-4GHS	USB Power Sensor	11/11/2022	Annual	11/11/2023	11710030062
Control Company	4352	Long Stem Thermometer	9/10/2021	Biennial	9/10/2023	210774678
Control Company	4352	Long Stem Thermometer	9/10/2021	Biennial	9/10/2023	210774685
Mitutoyo	500-196-30	CD-6"ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N6705B	DC Power Analyzer	5/5/2021	Triennial	5/5/2024	MY53004059
Keysight Technologies	N9020A	MXA Signal Analyzer	3/15/2023	Annual	3/15/2024	US46470561
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2111
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Seekonk	TSF-100	Torque Wrench	7/11/2022	Annual	7/11/2023	47639-29
SPEAG	DAK-3.5	Dielectric Assessment Kit	12/15/2022	Annual	12/15/2023	1278
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	8/15/2022	Annual	8/15/2023	1041
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	7/5/2022	Annual	7/5/2023	1039
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1379
SPEAG	CLA-13	Confined Loop Antenna	9/13/2022	Annual	9/13/2023	1002
SPEAG	D2450V2	2450 MHz SAR Dipole	11/25/2021	Biennial	11/25/2023	981
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/17/2023	Annual	1/17/2024	1558
SPEAG	EX3DV4	SAR Probe	1/11/2023	Annual	1/11/2024	7570

Note: 1) All equipment was used solely within its respective calibration period. 2) CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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15 MEASUREMENT UNCERTAINTIES

a			c	d	e = f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Symbol	Uncertainty Component	IEC/IEEE 62209-1528 ref.	Tol. (± %)*	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v
Measurement System Errors										
CF	Probe Calibration	8.4.1.1	18.6	N	2	1.0	1.0	9.3	9.3	∞
CFdrift	Probe Calibration Drift	8.4.1.2	1.7	R	1.73	1.0	1.0	1.0	1.0	∞
LIN	Probe Linearity	8.4.1.3	4.7	R	1.73	1.0	1.0	2.7	2.7	∞
BBS	Broadband Signal	8.4.1.4	2.8	R	1.73	1.0	1.0	1.6	1.6	∞
ISO	Probe Isotropy	8.4.1.5	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
DAE	Other Probe and data acquisition errors	8.4.1.6	0.3	N	1	1.0	1.0	0.3	0.3	∞
AMB	RF ambient and noise	8.4.1.7	1.8	N	1	1.0	1.0	1.8	1.8	∞
Δxyz	Probe Positioning errors	8.4.1.8	±0.005 mm	N	1	0.50	0.50	0.25	0.25	∞
DAT	Data processing errors	8.4.1.9	3.5	N	1	1.0	1.0	3.5	3.5	∞
Phantom and Device Errors										
LIQ(σ)	Conductivity (Meas.)	8.4.2.1	2.5	N	1	0.78	0.71	2.0	1.8	∞
LIQ(T _g)	Conductivity (Temp.)	8.4.2.2	2.4	R	1.73	0.78	0.71	1.1	1.0	∞
EPS	Phantom Permittivity	8.4.2.3	14.0	R	1.73	0.50	0.50	4.0	4.0	∞
DIS	Distance DUT - TSL	8.4.2.4	2.0	N	1	2.00	2.00	4.0	4.0	∞
Dxyz	Test Sample Positioning	8.4.2.5	3.1	N	1	1.0	1.0	3.1	3.1	35
H	Device Holder Uncertainty	8.4.2.6	1.7	N	1	1.0	2.0	1.7	3.4	5
MOD	Modulation Response	8.4.2.7	4.8	R	1.73	1.0	1.0	2.8	2.8	∞
TAS	Time-average SAR	8.4.2.8	1.7	R	1.73	1.0	1.0	1.0	1.0	∞
RFdrift	Output Power Variation - SAR drift measurement	8.4.2.9	2.5	N	1	1.0	1.0	2.5	2.5	∞
Corrections to the SAR result										
C(ε', σ)	Deviations to TSL targets	8.4.3.1	0.0	N	1	1.00	0.84	0.0	0.0	∞
C(ε', σ)	Deviations to TSL targets	8.4.3.1	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
C(R)	SAR Scaling	8.4.3.2	0.0	R	1.73	1.0	1.0	0.0	0.0	∞
Combined Standard Uncertainty (k=1)								RSS	14.2	14.4
Expanded Uncertainty (95% CONFIDENCE LEVEL)								k=2	28.3	28.8

The above measurement uncertainties are according to IEC/IEEE Std.62209-1528:2020

* Unit for Probe Positioning Errors is as indicated per IEC/IEEE Std.62209-1528:2020

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a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E.2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemispherical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.732	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.732	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.732	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.732	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E.3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)							RSS	12.2	12.0
Expanded Uncertainty							k=2	24.4	24.0
(95% CONFIDENCE LEVEL)									

The above measurement uncertainties are according to IEEE Std. 1528-2013

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16 CONCLUSION

16.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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