FCC SAR Test Report

FCC ID: 2A3TY-5C

Project No.	:	2111C114
Equipment	:	Wireless Probe Type Ultrasound Scanner
Brand Name	:	1) SonoMe 2) SONOFINDER
Test Model	:	1) 5C
Series Model	:	1) 14L 2) SF14L25
Date of Receipt	:	Nov. 16, 2021
Date of Test	:	Mar. 03, 2022
Issued Date	:	May 12, 2022
Report Version	:	R00
Test Sample	:	Engineering Sample No.: DG20220114419.
Standard(s)	:	Please refer to page 2.
Applicant	:	Bionet Co., Ltd.
Address	:	5F, 61 Digital-ro 31-gil, Guro-gu, Seoul 08375, REPUBLIC OF KOREA
Manufacturer	:	Bionet Co., Ltd.
Address	:	5F, 61 Digital-ro 31-gil, Guro-gu, Seoul 08375, REPUBLIC OF KOREA
Factory	:	Bionet Co., Ltd.
Address	:	#401, 34, LS-ro 91beon-gil, Dongan-gu, Anyang-si, Gyeonggi-Do 14119, REPUBLIC OF KOREA

The above equipment has been tested and found compliance with the requirement of the relative standards by BTL Inc.

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TESTING CERT #5123.02

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Standard(s)	:	**FCC 47CFR §2.1093** Radio frequency Radiation Exposure Evaluation: Portable Devices **ANSI Std C95.1-1992** Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz - 300 GHz. (IEEE Std C95.1-1991) **IEEE Std 1528-2013** Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques **KDB616217 D04** SAR for laptop and tablets v01r02 **KDB447498 D04** Interim General RF Exposure Guidance v01 **KDB248227 D01** 802. 11 Wi-Fi SAR v02r02 **KDB865664 D01** SAR measurement 100 MHz to 6 GHz v01r04 **KDB865664 D02** RF Exposure Reporting v01r02 **KDB690783 D01** SAR Listings on Grants v01r03

Declaration

BTL represents to the client that testing is done in accordance with standard procedures as applicable and that test instruments used has been calibrated with standards traceable to international standard(s) and/or national standard(s).

BTL's reports apply only to the specific samples tested under conditions. It is manufacture's responsibility to ensure that additional production units of this model are manufactured with the identical electrical and mechanical components. **BTL** shall have no liability for any declarations, inferences or generalizations drawn by the client or others from **BTL** issued reports.

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BTL's laboratory quality assurance procedures are in compliance with the **ISO/IEC 17025** requirements, and accredited by the conformity assessment authorities listed in this test report.

BTL is not responsible for the sampling stage, so the results only apply to the sample as received.

The information, data and test plan are provided by manufacturer which may affect the validity of results, so it is manufacturer's responsibility to ensure that the apparatus meets the essential requirements of applied standards and in all the possible configurations as representative of its intended use.

Limitation

For the use of the authority's logo is limited unless the Test Standard(s)/Scope(s)/Item(s) mentioned in this test report is (are) included in the conformity assessment authorities acceptance respective.

Please note that the measurement uncertainty is provided for informational purpose only and are not use in determining the Pass/Fail results.

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REPORT ISSUED HISTORY

Report No.	Version	Description	Issued Date	Note
BTL-FCC SAR-1-2111C114	R00	Original Report.	May 12, 2022	Valid

1. GENERAL INFORMATION

1.1 STATEMENT OF COMPLIANCE

Mode	Highest Reported Body SAR-1g (W/kg)
2.4G WiFi	0.037

Note:
1) The device is in compliance with Specific Absorption Rate (SAR) for general population uncontrolled exposure limits according to the FCC rule §2.1093, the ANSI C95.1:1992/IEEE C95.1:1991, the NCRP Report Number 86 for uncontrolled environment and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013.

1.2 LABORATORY ENVIRONMENT

Temperature	Min. = 20ºC, Max. = 24ºC
Relative humidity	Min. = 30%, Max. = 70%
Ground system resistance	< 0.5Ω
Ambient noise is checked and found very low and in compliance with requirement of standards. Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

1.3 GENERAL DESCRIPTION OF EUT

Equipment	Wireless Probe Type Ultrasound Scanner	
Brand Name	1) SonoMe 2) SONOFINDER	
Test Model	1) 5C	
Series Model	1) 14L 2) SF14L25	
Model Difference(s)	The 5C, 14L and SF14L25 have the same structural composition and circuit configuration. The only difference is the probe type and probe software which will not influence the RF characteristics.	
Modulation	WiFi(DSSS/OFDM)	
Operation Frequency Range(s)	Band	TX (MHz)
	2.4G WLAN	2400~2483.5
Test Channels (low-mid-high)	1-6-11 (2.4G WiFi 802.11n HT20)	
Antenna Gain (dBi)	Band	Ant A
	WLAN 2.4G	0.0
Other Information		
Battery	Model Name	SNP-4200
	Power Rating	DC 3.8V, 4200mAh

1.4 MAIN TEST INSTRUMENTS

Item	Equipment	Manufacturer	Model	Serial No.	Cal. Date	Cal. Interval
1	Data Acquisition Electronics	Speag	DAE4	1423	Jan. 21, 2022	1 Year
2	E-field Probe	Speag	EX3DV4	7544	Dec. 29, 2021	1 Year
3	System Validation Dipole	Speag	D2450V2	919	May 28, 2021	3 Years
4	Twin Sam Phantom	Speag	Twin Sam Phantom V5.0	1469	N/A	N/A
5	Power Amplifier	Mini-Circuits	ZHL-42W+	QA1333003	Dec. 26, 2021	1 Year
6	DC Source metter	Iteck	IT6154	0061041267682 01001	Jul. 24, 2021	1 Year
7	Signal Analyzer	R&S	FSV7	103120	Jul. 10, 2021	1 Year
8	Vector Network Analyzer	Agilent	E5071C	MY46102965	Feb. 19, 2022	1 Year
9	Signal Generator	Agilent	N5172B	MY53050758	Feb. 19, 2022	1 Year
10	Smart Power Sensor	R&S	NRP-Z21	102209	Feb. 19, 2022	1 Year
11	3.5mm Economy Calibration Kit	Agilent	85052D	MY43252246	Dec. 14, 2021	1 Year
12	Dielectric Assessment Kit	Speag	DAK-3.5	1226	N/A	N/A
13	Directional Coupler	Woken	TS-PCC0M-05	0107090019	Feb. 19, 2022	1 Year
14	Coupler	Woken	0110A05601O-10	COM5BNW1A2	Feb. 19, 2022	1 Year
15	Digital Themometer	TES	TES-1310	210706071	Dec. 07, 2021	1 Year

Remark:
1. "N/A" denotes no model name, serial No. or calibration specified.
2. 1) Per KDB865664 D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
    a) There is no physical damage on the dipole;
    b) System check with specific dipole is within 10% of calibrated value;
    c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement;
    d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.

   2) Network analyzer probe calibration against air, distilled water and a short block performed before measuring liquid parameters.

2. RF EMISSIONS MEASUREMENT

2.1 TEST FACILITY

The test facilities used to collect the test data in this report is SAR room at the location of Room 108, Building 2, No.1, Yile Road, Songshan Lake Zone, Dongguan City, Guangdong, People's Republic of China.
BTL's Designation Number for FCC: CN1240.

2.2 MEASUREMENT UNCERTAINTY

Uncertainty Budget for Frequency range of 300 MHz to 3 GHz

Error Description	Uncertainty Value (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)	Vi V_{eff}
Measurement System								
Probe Calibration	6.05	Normal	1	1	1	± 6.05 %	± 6.05 %	∞
Axial Isotropy	4.7	Rectangular	$\sqrt{3}$	0.7	0.7	± 1.9 %	± 1.9 %	∞
Hemispherical Isotropy	9.6	Rectangular	$\sqrt{3}$	0.7	0.7	± 3.9 %	± 3.9 %	∞
Boundary Effects	1	Rectangular	$\sqrt{3}$	1	1	± 0.6 %	± 0.6 %	∞
Linearity	4.7	Rectangular	$\sqrt{3}$	1	1	± 2.7 %	± 2.7 %	∞
Detection Limits	1	Rectangular	$\sqrt{3}$	1	1	± 0.6 %	± 0.6 %	∞
Modulation response	2.4	Rectangular	$\sqrt{3}$	1	1	±1.4 %	±1.4 %	∞
Readout Electronics	0.3	Normal	1	1	1	± 0.3 %	± 0.3 %	∞
Response Time	0.8	Rectangular	$\sqrt{3}$	1	1	± 0.5%	± 0.5 %	∞
Integration Time	2.6	Rectangular	$\sqrt{3}$	1	1	± 1.5 %	± 1.5 %	∞
RF Ambient – Noise	3	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	± 1.7 %	∞
RF Ambient – Reflections	3	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	± 1.7 %	∞
Probe Positioner	0.4	Rectangular	$\sqrt{3}$	1	1	± 0.2 %	± 0.2 %	∞
Probe Positioning	2.9	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	±1.7 %	∞
Max.SAR Evaluation	4	Rectangular	$\sqrt{3}$	1	1	± 2.3 %	± 2.3 %	∞
Test Sample Related								
Device Positioning	1.7 1.9	Normal	1	1	1	± 1.8 %	± 1.9 %	145
Device Holder	2.2 2.3	Normal	1	1	1	± 1.7 %	± 1.9 %	5
Power Drift	5.0	Rectangular	$\sqrt{3}$	1	1	± 2.9 %	± 2.9 %	∞
Power Scaling	0	Rectangular	$\sqrt{3}$	1	1	± 0.0 %	± 0.0 %	∞
Phantom and Setup								
Phantom Production Tolerances	6.1	Rectangular	$\sqrt{3}$	1	1	3.5 %	3.5 %	∞
SAR correction	1.9	Rectangular	$\sqrt{3}$	1	0.84	1.1 %	0.9 %	
Liquid Conductivity (mea.)	2.5	Rectangular	$\sqrt{3}$	0.78	0.71	1.1 %	1.0 %	∞
Liquid Permittivity (mea.)	2.5	Rectangular	$\sqrt{3}$	0.26	0.26	0.4 %	0.4 %	∞
Temp. unc. - Conductivity	3.4	Rectangular	$\sqrt{3}$	0.78	0.71	1.5 %	1.4 %	∞
Temp. unc. - Permittivity	0.4	Rectangular	$\sqrt{3}$	0.23	0.26	0.1 %	0.1 %	∞
Combined Standard Uncertainty (K = 1)						± 10.5 %	± 10.5 %	361
Expanded Uncertainty (K = 2)						**± 21.0 %**	**± 21.0 %**	

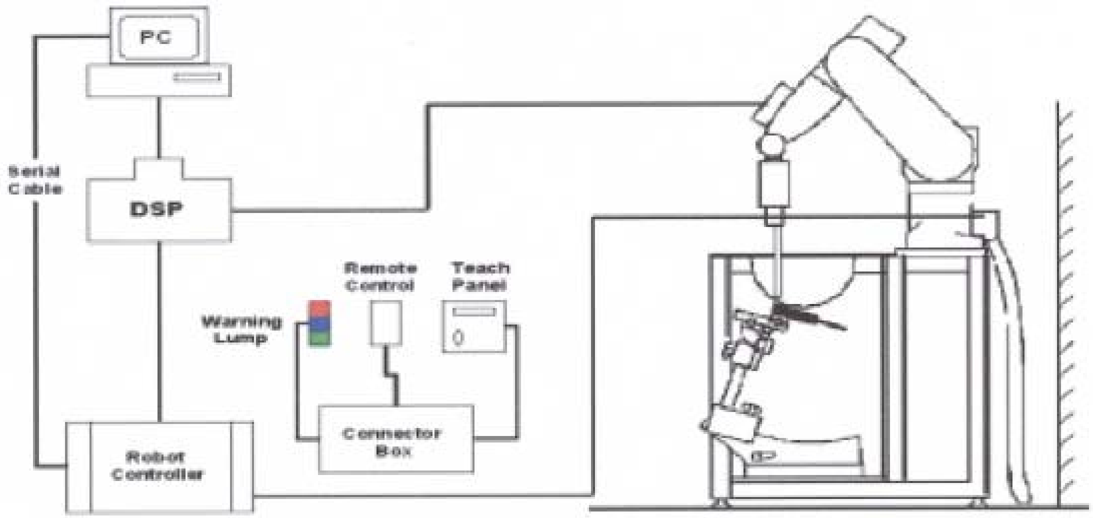
3. SAR MEASUREMENTS SYSTEM CONFIGURATION

3.1 SAR MEASUREMENT SET-UP

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

1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).
2. A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
3. A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
4. A unit to operate the optical surface detector which is connected to the EOC.
5. The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.
6. TheDASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows.
7. DASY5 software and SEMCAD data evaluation software.
8. Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
9. The generic twin phantom enabling the testing of left-hand and right-hand usage.
10. The device holder for handheld mobile phones.
11. Tissue simulating liquid mixed according to the given recipes.
12. System validation dipoles allowing to validate the proper functioning of the system.

3.1.1 TEST SETUP LAYOUT



3.2 DASY5 E-FIELD PROBE SYSTEM

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation.

3.2.1 PROBE SPECIFICATION

EX3DV4

Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available
Frequency	10 MHz to 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 µW/g to > 100 mW/g Linearity:± 0.2dB
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.0 mm

E-field Probe

3.2.2 E-FIELD PROBE CALIBRATION

Each probe is calibrated according to a dosimetric assessment procedure with accuracy better than ±10%. The spherical isotropy was evaluated and found to be better than ± 0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies bellow 1 GHz, and in a wave guide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$\mathrm{SAR} = C\frac{\Delta T}{\Delta t}$$

Where: Δt = Exposure time (30 seconds),
C = Heat capacity of tissue (brain or muscle),
ΔT = Temperature increase due to RF exposure.

Or
$$\mathrm{SAR} = \frac{|E|^2 \sigma}{\rho}$$

Where: σ = Simulated tissue conductivity,
ρ = Tissue density (kg/m3).

3.2.3 OTHER TEST EQUIPMENT

3.2.3.1 Device Holder for Transmitters

Construction: Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices (e.g., laptops, cameras, etc.) It is light weight and fits easily on the upper part of the Mounting Device in place of the phone positioner. The extension is fully compatible with the Twin SAM, ELI and SAM v6.0 Phantoms.
Material: POM, Acrylic glass, Foam

3.2.3.2 Phantom

Model	Twin SAM	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.	
Shell Thickness	2 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length:1000mm; Width: 500mm Height: adjustable feet	
Aailable	Special	

3.2.4 SCANNING PROCEDURE

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max. ± 5 %.

The “surface check” measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above ± 0.1mm). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe. (It does not depend on the surface reflectivity or the probe angle to the surface within ± 30°.)

- Area Scan

The “area scan” measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The standard scan uses large grid spacing for faster measurement. Standard grid spacing for head measurements is 15 mm in x- and y- dimension (≤2GHz), 12 mm in x- and y- dimension (2-4 GHz) and 10mm in x- and y- dimension (4-6GHz). If a finer resolution is needed, the grid spacing can be reduced. Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation.

- Zoom Scan

A “zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous “coarse” scan. This is a fine grid with maximum scan spatial resolution: Δx_{zoom}, Δy_{zoom}≤2GHz -≤8mm, 2-4GHz -≤5 mm and 4-6 GHz-≤4mm; Δz_{zoom}≤3GHz -≤5 mm, 3-4 GHz-≤4mm and 4-6GHz-≤2mm where the robot additionally moves the probe along the z-axis away from the bottom of the Phantom. DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in Appendix B. Test results relevant for the specified standard (see chapter 1.4.) are shown in table form in chapter 7.2.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 2 mm steps. This measurement shows the continuity of the liquid and can - depending in the field strength – also show the liquid depth.

The following table summarizes the area scan and zoom scan resolutions per FCC KDB 865664D01:

Frequency	Maximun Area Scan resolution (Δx_{area}, Δy_{area})	Maximun Zoom Scan spatial resolution (Δx_{Zoom}, Δy_{Zoom})	Maximun Zoom Scan spatial resolution			Minimum zoom scan volume (x,y,z)
			Uniform Grid	Graded Grad		
			$\Delta z_{Zoom}(n)$	$\Delta z_{Zoom}(1)$*	$\Delta z_{Zoom}(n>1)$*	
≤2GHz	≤15mm	≤8mm	≤5mm	≤4mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥30mm
2-3GHz	≤12mm	≤5mm	≤5mm	≤4mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥30mm
3-4GHz	≤12mm	≤5mm	≤4mm	≤3mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥28mm
4-5GHz	≤10mm	≤4mm	≤3mm	≤2.5mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥25mm
5-6GHz	≤10mm	≤4mm	≤2mm	≤2mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥22mm

3.2.5 SPATIAL PEAK SAR EVALUATION

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of 5 x 5 x 7 points (with 8mm horizontal resolution) or 7 x 7 x 7 points (with 5mm horizontal resolution) or 8 x 8 x 7 points (with 4mm horizontal resolution). The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting “Graph Evaluated”.
- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.
- All neighboring volumes are evaluated until no neighboring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computer mathematic, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computer mathematic, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY5 uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

3.2.6 DATA STORAGE AND EVALUATION

3.2.6.1 Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension "DAE". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

3.2.7 DATA EVALUATION BY SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	Sensitivity	$Norm_i$, a_{i0}, a_{i1}, a_{i2}
	Conversion factor	$ConvF_i$
	Diode compression point	Dcp_i
Device parameters:	Frequency	f
	Crest factor	cf
Media parameters:	Conductivity	
	Density	

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY5 components. In the direct measuring mode of the multi meter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

With V_i = compensated signal of channel i (i = x, y, z)

U_i = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp_i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes: $E_i = (V_i \ / \ Norm_i \cdot ConvF \ )^{1/2}$

H-field probes: $H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1} f + a_{i2} f^2) / f$

With V_i = compensated signal of channel i (i = x, y, z)

$Norm_i$ = sensor sensitivity of channel i (i = x, y, z)

$[mV/(V/m)^2]$ for E-field Probes

ConvF = sensitivity enhancement in solution

aij = sensor sensitivity factors for H-field probes

f = carrier frequency [GHz]

E_i = electric field strength of channel i in V/m

H_i = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = (E_X^2 + E_Y^2 + E_Z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$SAR = (E_{tot})^2 \cdot \boldsymbol{\sigma} / (\boldsymbol{\rho} \cdot 1000)$$

With SAR = local specific absorption rate in mW/g

E_{tot} = total field strength in V/m

= conductivity in [mho/m] or [Siemens/m]

= equivalent tissue density in g/cm^3

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}^2 / 3770 \text{ or } P_{pwe} = H_{tot}^2 \cdot 37.7$$

With P_{pwe} = equivalent power density of a plane wave in mW/cm^2

E_{tot} = total field strength in V/m

H_{tot} = total magnetic field strength in A/m

4. SYSTEM VERIFICATION PROCEDURE

4.1 TISSUE VERIFICATION

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

The following materials are used for producing the tissue-equivalent materials.

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
Head 2450	-	45.0	-	0.1	-	-	54.9	-

Salt: 99+% Pure Sodium Chloride; Sugar: 98+% Pure Sucrose; Water: De-ionized, 16M + resistivity HEC: Hydroxyethyl Cellulose; DGBE: 99+% Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy)ethanol] Triton X-100(ultra pure): Polyethylene glycol mono [4-(1,1,3,3-tetramethylbutyl)phenyl]ether

Tissue Verification									
Tissue Type	Frequency (MHz)	Liquid Temp. (℃)	Conductivity (σ)	Permittivity (εr)	Targeted Conductivity (σ)	Targeted Permittivity (εr)	Deviation Conductivity (σ) (%)	Deviation Permittivity (εr) (%)	Date
Head	2450	22.5	1.758	38.592	1.80	39.2	-2.33	-1.55	Mar. 03, 2022

Note:
1) The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.
2) KDB 865664 was ensured to be applied for probe calibration frequencies greater than or equal to 50MHz of the EUT frequencies.
3) The above measured tissue parameters were used in the DASY software to perform interpolation via the DASY software to determine actual dielectric parameters at the test frequencies. The SAR test plots may slightly differ from the table above since the DASY rounds to three significant digits.

4.2 SYSTEM CHECK

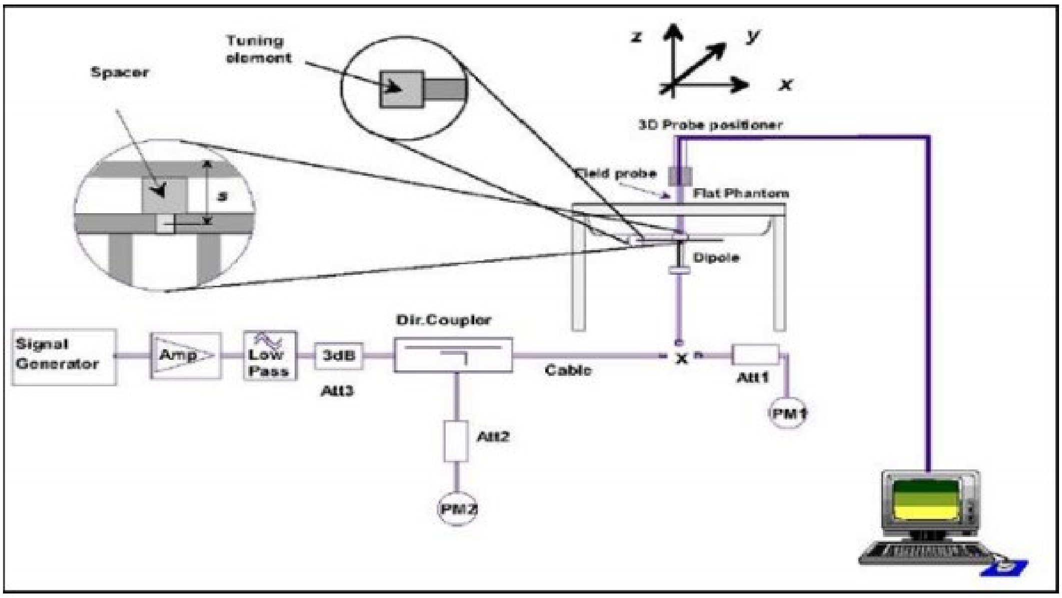
The system check is performed for verifying the accuracy of the complete measurement system and performance of the software. The system check is performed with tissue equivalent material according to IEEE P1528 (described above). The following table shows system check results for all frequency bands and tissue liquids used during the tests.

System Check	Date	Frequency (MHz)	Targeted SAR 1g (W/kg)	Measured SAR 1g (W/kg)	normalized SAR 1g (W/kg)	Deviation 1g (%)	Dipole S/N
Head	Mar. 03, 2022	2450	52.10	12.90	51.60	-0.96	919

4.3 SYSTEM CHECK PROCEDURE

The system check is performed by using a system check dipole which is positioned parallel to the planar part of the SAM phantom at the reference point. The distance of the dipole to the SAM phantom is determined by a plexiglass spacer. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 250mW (below 3GHz) or 100mW (3-6GHz). To adjust this power a power meter is used.
The power sensor is connected to the cable before the system check to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system check to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test.

System check results have to be equal or near the values determined during dipole calibration (target SAR in table above) with the relevant liquids and test system (±10 %).



5. SAR MEASUREMENT VARIABILITY AND UNCERTAINTY

5.1 SAR MEASUREMENT VARIABILITY

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

1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

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

The detailed repeated measurement results are shown in Section 7.2.

6. OPERATIONAL CONDITIONS DURING TEST

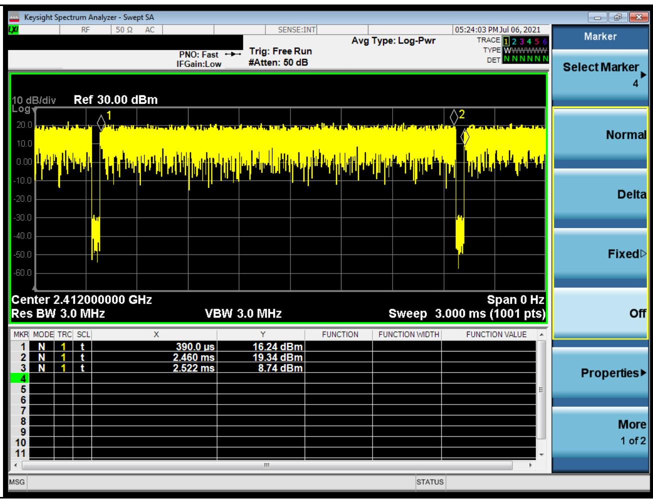
6.1 TEST CONFIGURATION

6.1.1 WIFI TEST CONFIGURATION

For WLAN SAR testing, WLAN engineering testing software installed on the DUT can provide continuous transmitting RF signal.

For WiFi SAR testing, a communication link is set up with the test mode software for WiFi mode test. During the test, at the each test frequency channel, the EUT is operated at the RF continuous emission mode. The test procedures in KDB 248227 D01 are applied.

Duty Cycle
WiFi 2.4G
97.09%



6.1.1.1 2.4G SAR Test Requirements

802.11b DSSS SAR Test Requirements
SAR is measured for 2.4 GHz 802.11b DSSS using either a 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 ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
2) When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.

2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements
When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied. SAR is not required for the following 2.4 GHz OFDM conditions.
1) When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
2) When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

SAR Test Requirements for OFDM configurations
When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, each standalone
And frequency aggregated band is considered separately for SAR test reduction. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

6.2 TEST POSITION

6.2.1 BODY TEST CONFIGURATION

The overall diagonal dimension of the display section of a tablet is 27.3cm>20cm, per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the Tablet touching the phantom. SAR evaluation for the front surface of tablet display screens is generally not necessary. The SAR Exclusion Threshold in KDB 447498 D01 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned adjacent the phantom and the edge containing the antenna positioned perpendicular to the phantom.

SAR test reduction and exclusion guidance

(1) The SAR exclusion threshold for distances<50mm is defined by the following equation:

$$\frac{\text{(max. power of channel, including tune-up tolerance, mW)}}{\text{(min. test separation distance, mm)}} \cdot \sqrt{\text{Frequency (GHz)}} \leq 3.0$$

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

(2) The SAR exclusion threshold for distances>50mm is defined by the following equation, as illustrated in KDB 447498 D01 Appendix B:

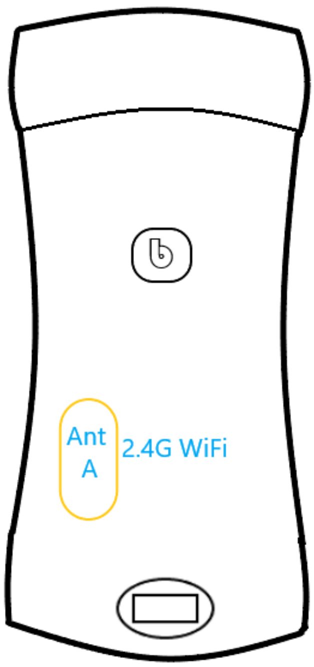
a) at 100 MHz to1500 MHz

[Power allowed at numeric Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · (f $_{(MHz)}$/150)] mW

b) at >1500MHz and ≤6GHz

[Power allowed at numeric Threshold at 50 mm in step 1) + (test separation distance - 50 mm) ·10] mW

The location of the antenna inside the EUT is shown as below picture:



7. TEST RESULT

7.1 CONDUCTED POWER RESULTS

7.1.1 CONDUCTED POWER MEASUREMENTS OF WIFI 2.4G

Band	Mode	Channel	Frequency (MHz)	Data Rate (Mbps)	Max. Tune up	Average Power(dBm)
2.4G WIFI	802.11n HT20	1	2412	6.5	7.00	5.84
		6	2437		7.00	6.30
		11	2462		7.00	**6.42**

Note:
1) The Average conducted power of WiFi 2.4GHz is measured with RMS detector.
2) The tested channel results are marks in bold.

7.2 SAR TEST RESULTS

General Notes:
1) Per KDB447498 D04, all measurement SAR results are scaled to the maximum tune-up tolerance limit to demonstrate compliant.
2) Per KDB447498 D04, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is: ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz. When the maximum output power variation across the required test channels is > ½ dB, instead of the middle channel, the highest output power channel must be used.
3) Per KDB865664 D01, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8W/kg; if the deviation among the repeated measurement is ≤ 20%, and the measured SAR < 1.45W/kg, only one repeated measurement is required.
4) Per KDB865664 D02, SAR plot is only required for the highest measured SAR in each exposure configuration, wireless mode and frequency band combination; Plots are also required when the measured SAR is > 1.5 W/kg, or > 7.0 W/kg for occupational exposure. The published RF exposure KDB procedures may require additional plots; for example, to support SAR to peak location separation ratio test exclusion and/or volume scan post-processing.

WLAN Notes:
1. For exposure conditions with multiple test positions, such as handset operating next to the ear, devices with hotspot mode, procedures for initial test position can be applied. Using the transmission mode determined by the DSSS procedure or initial test configuration, area scans are measured for all positions in an exposure condition. The test position with the highest extrapolated (peak) SAR is used as the initial test position. When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other (remaining) test positions. Otherwise, SAR is evaluated at the subsequent highest peak SAR position until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured.
2. Justification for test configurations for WLAN per KDB Publication 248227 for 2.4GHZ WIFI single transmission chain operations, the highest measured maximum output power Channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4GHz 802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSS SAR. See Section 6.1.4 for more information.

7.2.1 SAR MEASUREMENT RESULT

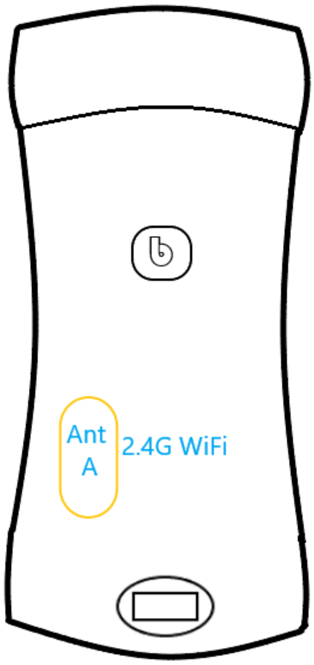
Test No.	Band	Channel	Test Position	Separation Distance (cm)	Ant	Data Rate	Duty Cycle (%)	Maximum Tune-up (dBm)	Conducted Power (dBm)	Power Drift (dB)	SAR 1g (W/kg)	SAR 10g (W/kg)	Reported 10g SAR (W/kg)
W01	802.11n HT20	11	Front Face	0	A	6.5	97.09	7.00	6.42	0.12	<0.001	<0.001	<0.001
W02	802.11n HT20	11	Rear Face	0	A	6.5	97.09	7.00	6.42	0	**0.031**	**0.008**	**0.037**
W03	802.11n HT20	11	Left Side	0	A	6.5	97.09	7.00	6.42	-0.16	<0.001	<0.001	<0.001
W04	802.11n HT20	11	Right Side	0	A	6.5	97.09	7.00	6.42	0.03	<0.001	<0.001	<0.001
W05	802.11n HT20	11	Top Side	0	A	6.5	97.09	7.00	6.42	-0.1	<0.001	<0.001	<0.001
W06	802.11n HT20	11	Bottom Side	0	A	6.5	97.09	7.00	6.42	-0.05	<0.001	<0.001	<0.001

Note: The value with boldface is the maximum SAR Value of each test band.

8. MULTIPLE TRANSMITTER EVALUATION

The following tables list information which is relevant for the decision if a simultaneous transmit evaluation is necessary according to FCC KDB447498 D04 Interim General RF Exposure Guidance v01.

The location of the antenna inside the EUT is shown as below picture:

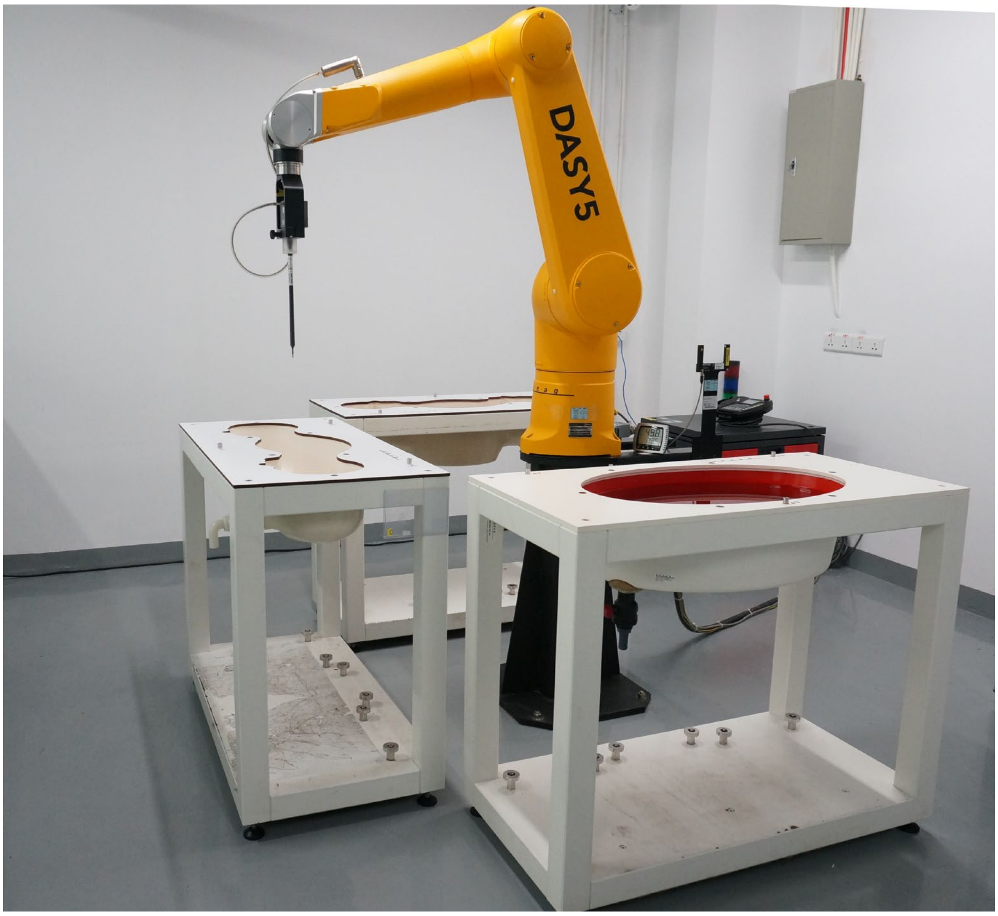


Note: The EUT only has one antenna and does not have synchronous transmission function.

APPENDIX

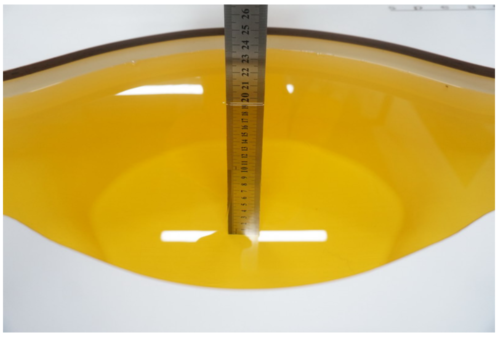
1. TEST LAYOUT

Specific Absorption Rate Test Layout



Liquid depth in the flat Phantom (≥15cm depth)

HSL_2300MHz-2700MHz_Body_19.5cm



Appendix A. SAR Plots of System Verification

(Pls See BTL-FCC SAR-1-2111C114_Appendix A.)

Appendix B. SAR Plots of SAR Measurement

(Pls See BTL-FCC SAR-1-2111C114_Appendix B.)

Appendix C. Calibration Certificate

(Pls See BTL-FCC SAR-1-2111C114_Appendix C.)

Appendix D. Photographs of the Test Set-Up

(Pls See BTL-FCC SAR-1-2111C114_Appendix D.)

End of Test Report