



FCC SAR TEST REPORT

Report No: STS1711314H01

Issued for

Trackimo LLC.

350NE 24th Street, Unit 104, Miami, Florida, United States

Product Name:	GPS Tracker		
Brand Name:	trackimo		
Model Name:	TRKM015		
Series Model:	N/A		
FCC ID:	2AAI6-TRKM015		
	ANSI/IEEE Std. C95.1		
Test Standard:	FCC 47 CFR Part 2 (2.1093)		
	IEEE 1528: 2013		
Max. Report SAR (1g):	Body: 1.146 W/kg		

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Test Report Certification

Applicant's name Trackimo LLC.

Manufacture's Name HUIZHOU QIAOWEI INTELLIGENT OVERSEAS CO.,LTD

Address B2 building, ELing phase 2, wuyi village, chenjiang steet, gaoxin

district, Huizhou city, Guangdong Province, China

Product description

Product name: GPS Tracker

Brand name: trackimo

Model name: TRKM015

Series Model.....: N/A

ANSI/IEEE Std. C95.1-1992

Standards FCC 47 CFR Part 2 (2.1093)

IEEE 1528: 2013

The device was tested by Shenzhen STS Test Services Co., Ltd. in accordance with the measurement methods and procedures specified in KDB 865664 The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

Date of Test

Date (s) of performance of tests 26 Dec. 2017

Test Result..... Pass

Testing Engineer : Jan 13u

(Aaron Bu)

Technical Manager:

(John Zou)

Authorized Signatory:

(Vita Li)







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1.General Information

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head and body tissues exposed to radio frequency (RF) radiation from wireless portable devices for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC).

1.1 EUT Description

1.1 LOT Description								
Product Name	GPS Tracker							
Brand Name	trackimo							
Model Name	TRKM015							
Series Model	N/A	N/A						
FCC ID	2AAI6-TRKM015							
Model Difference	N/A							
	Rated Voltage: 3.8V;							
Battery		Charge Limit: 4.3V;						
	Capacity: 800mAh							
Device Category	Portable							
Product stage	Production unit							
RF Exposure Environment	General Population / Uncontrolled	d						
Hardware Version	CC01_V2.0							
Software Version	2.0							
Frequency Range	GSM 850:824.2~848.8MHz PCS1900:1850.2~1909.8MHz WCDMA Band II:1852.4~1907.6 WCDMA Band V:826.4~846.6M Bluetooth:2402~ 2480MHz							
	Mode	Body Worn (W/kg)						
Max. Reported	GSM 850	1.146						
•	GSM 1900	1.112						
SAR(1g):	WCDMA Band II	0.705						
(Limit:1.6W/kg)	WCDMA Band V	0.691						
	Bluetooth Note	0.005						
1-g Sum SAR		1.151						
Operating Mode:	GSM: GSM GPRS; EGPRS Cla WCDMA:RMC,HSDPA,HSUPA BLE							
Antenna Specification:	GSM,WCDMA: PIFA Antenna BT: PIFA Antenna							
SIM Card	Support single card							
Hotspot Mode:	Not Support							
DTM Mode:	Not Support							
Note:								

Note

- 1. Bluetooth SAR was estimated
- 2. The dual SIM card mobile has 2 SIM slots and supports dual SIM dual standby. The WWAN radio transmission will be enabled by either one SIM at a time (Single active)
- 3. After pre-scan two SIM cards power, we found test result of the SIM1 was the worse, so we chose SIM1 card to perform all tests.
- 4. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power



1.2 Test Environment

Ambient conditions in the SAR laboratory:

Items	Required
Temperature (°C)	18-25
Humidity (%RH)	30-70

1.3 Test Factory

Shenzhen STS Test Services Co., Ltd.

Add.: 1/F., Building B, Zhuoke Science Park, No.190, Chongqing Road,

Fuyong Street, Bao'an District, Shenzhen, Guangdong, China

CNAS Registration No.: L7649 FCC Registration No.: 625569 IC Registration No.: 12108A A2LA Certificate No.: 4338.01





2.Test Standards And Limits

No.	Identity	Document Title
1	47 CFR Part 2	Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
2	ANSI/IEEE Std. C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
3	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
4	FCC KDB 447498 D01 v06	GPS Tracker and Portable Device RF Exposure Procedures and Equipment Authorization Policies
5	FCC KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
6	FCC KDB 865664 D02 v01r02	RF Exposure Reporting
7	FCC KDB 941225 D01 v03r01	SAR Measurement Procedures for 3G Devices
8	FCC KDB 648474 D04 v01r03	SAR Evaluation Considerations for Wireless Handsets

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

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

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

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

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

Population/Uncontrolled Environments:

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

Occupational/Controlled Environments:

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

NOTE GENERAL POPULATION/UNCONTROLLED EXPOSURE PARTIAL BODY LIMIT 1.6 W/kg



3. SAR Measurement System

3.1 Definition Of Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

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

SAR is expressed in units of Watts per kilogram (W/kg) SAR measurement can be related to the electrical field in the tissue by

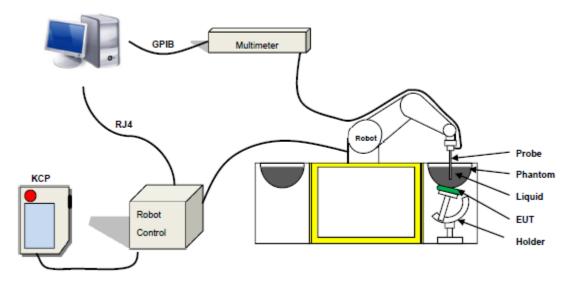
$$SAR = \frac{\sigma E^2}{\rho}$$

Where: σ is the conductivity of the tissue,

 $\boldsymbol{\rho}$ is the mass density of the tissue and E is the RMS electrical field strength.

3.2 SAR System

MVG SAR System Diagram:



Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue



The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

3.2.1 Probe

For the measurements the Specific Dosimetric E-Field Probe SN 14/16 EP309 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter: 5 mm
- Length of Individual Dipoles: 4.5 mm
- Maximum external diameter: 8 mm
- Distance between dipole/probe extremity: 8 mm (repeatability better than +/- 2.7mm)
- Probe linearity: 0±2.27%(±0.10dB)
- Axial Isotropy: < 0.10 dB
- Spherical Isotropy: < 0.10 dB
- Calibration range: 400 MHz to 3 GHz for head & body simulating liquid.
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°



Figure 1-MVG COMOSAR Dosimetric E field Dipole



3.2.2 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.



Figure-SN 32/14 SAM115



Figure-SN 32/14 SAM116

3.2.3 Device Holder



The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of \pm 0.5 mm would produce a SAR uncertainty of \pm 20 %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.



4. Tissue Simulating Liquids

4.1 Simulating Liquids Parameter Check

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Frequency	Bactericide	DGBE	HEC	NaCl	Sucrose	1,2-Propan ediol	X100	Water	Conductivity	Permittivity
(MHz)	%	%	%	%	%	%	%	%	σ	εr
750	/	/	/	0.79	/	64.81	/	34.40	0.97	41.8
835	/	/	/	0.79	/	64.81	/	34.40	0.97	41.8
900	/	/	/	0.79		64.81	/	34.40	0.97	41.8
1800	/	13.84	1	0.35	1	/	30.45	55.36	1.38	41.0
1900	/	13.84	1	0.35	/	1	30.45	55.36	1.38	41.0
2000	/	7.99	1	0.16	/	/	19.97	71.88	1.55	41.1
2450	/	7.99	/	0.16	/	/	19.97	71.88	1.88	40.3
2600	/	7.99	/	0.16	1	/	19.97	71.88	1.88	40.3

Tissue dielectric parameters for head and body phantoms								
ε _τ σ								
Frequency		r	S	S/m				
, ,	Head	Body	Head	Body				
300	45.3	58.2	0.87	0.92				
450	43.5	58.7	0.87	0.94				
900	41.5	55.0	0.97	1.05				
1450	40.5	54.0	1.20	1.30				
1800	40.0	53.3	1.40	1.52				
2450	39.2	52.7	1.80	1.95				
3000	38.5	52.0	2.40	2.73				
5800	35.3	48.2	5.27	6.00				



LIQUID MEASUREMENT RESULTS

Date			oient dition	Body Simu Liquid	•		Torgot	Measured	Deviation	Limited
Date		Temp. [°C]	Humidity [%]	Frequency	Temp. [°C]	Parameters	Target	ivieasured	[%]	[%]
2017 12	26	22.6	44	OOF MILE	00.4	Permittivity:	55.20	55.18	-0.03	± 5
2017-12-	-20	22.6	41	835 MHz	22.1	Conductivity	0.97	0.96	-1.03	± 5
2017-12-	26	22.6	41	1900 MHz	22.1	Permittivity:	53.30	53.78	0.90	± 5
2017-12-	-20	22.0	41	1900 MIDZ	22.1	Conductivity	1.52	1.54	1.33	± 5



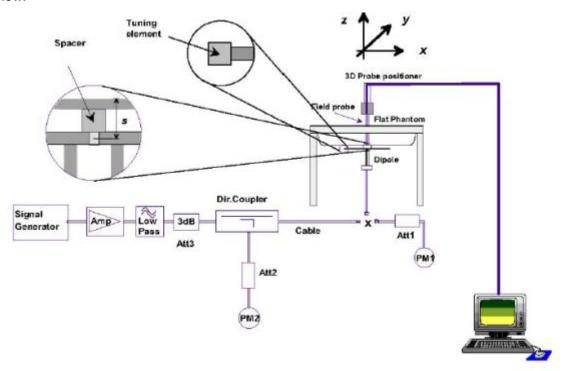


5. SAR System Validation

5.1 Validation System

Each MVG system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the MVG software, enable the user to conduct the system performance check and system validation. System kit includes a dipole, and dipole device holder

The system check verifies that the system operates within its specifications. It's performed daily or before every SAR measurement. The system check uses normal SAR measurement in the flat section of the phantom with a matched dipole at a specified distance. The system validation setup is shown as below.



5.2 Validation Result

Comparing to the original SAR value provided by MVG, the validation data should be within its specification of 10 %.

Freq.(MHz)	Power(mW)	Tested Value (W/Kg)	Normalized SAR (W/kg)	Target(W/Kg)	Tolerance(%)	Date
835 Body	100	0.957	9.57	9.56	0.09	2017-12-26
1900 Body	100	3.991	39.91	39.7	0.54	2017-12-26

Note: The tolerance limit of System validation ±10%.





6. SAR Evaluation Procedures

The procedure for assessing the average SAR value consists of the following steps:

The following steps are used for each test position

- Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface
- Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
- Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
- Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

Area Scan& Zoom Scan:

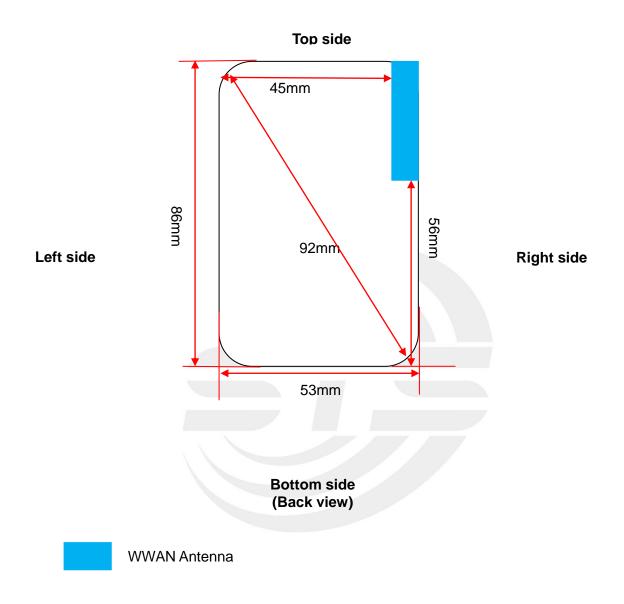
First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR -distribution over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r01 quoted below.

When the 1-g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.



7. EUT Antenna Location Sketch

It is a GPS Tracker, support GSM/WCDMA mode.





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7.1 SAR test exclusion consider table

According with FCC KDB 447498 D01, appendix A, <SAR test exclusion thresholds for 100MHz ~ 6GHz and≤50mm>table, this device SAR test configurations consider as following:

	Test position configurations									
Band	Front	Back	Right edge	Left edge	Top edge	Bottom edge				
WWAN	<5mm	<5mm	<5mm	45mm	<5mm	56mm				
VVVVAIN	Yes	Yes	Yes	No	Yes	No				

Note:

- maximum power is the source-based time-average power and represents the maximum RF output power among production units.
- 2. per KDB 447498 D01, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
- 3. per KDB 447498 D01, standalone SAR test exclusion threshold is applied; if the distance of the antenna to the user is <5mm, 5mm is user to determine SAR exclusion threshold
- 4. per KDB 447498 D01, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distance ≤50mm are determined by: [(max.power of channel, including tune-up tolerance, Mw)/(min. test separation distance, mm)]*[√f(GHZ))≤3.0 for 1-g SAR and≤7.5 for10-g extremity SAR ,f(GHz) is the RF channel transmit frequency in GHz. Power and distance are rounded to the nearest mW and mm before calculation. The result is rounded to one decimal place for comparison For <50mm distance, we just calculate mW of the exclusion threshold value(3.0)to do compare</p>
- per KDB 447498 D01, at 100 MHz to 6GHz and for test separation distances >50mm, the SAR test exclusion threshold is determined according to the following

 a)[threshold at 50mm in step 1]+(test separation distance -50mm)*(f (MHz)/150)]Mw, at 100 MHz to 1500 MHz
 b) [threshold at 50mm in step1]+(test separation distance -50mm) *10]mW at> 1500MHz and≤6GHz
- 6. Per KDB 447498 D02, RMC 12.2kbps setting is used to evaluate SAR. If HSDPA/HSUPA/DC-HSDPA output power is<0.25db higher than RMC 12.2kbps,or reported SAR with RMC 12.2kbps setting is ≤1.2W/Kg, HSDPA/HSUPA/DC-HSDPA SAR evaluation can be excluded.
- 7. Per KDB 248227 D01, choose the highest output power channel to test SAR and determine further SAR exclusion 8.for each frequency band ,testing at higher data rates and higher order modulations is not required when the maximum average output power for each of each of these configurations is less than 1/4db higher than those measured at the lower data rate than 11b mode ,thus the SAR can be excluded.

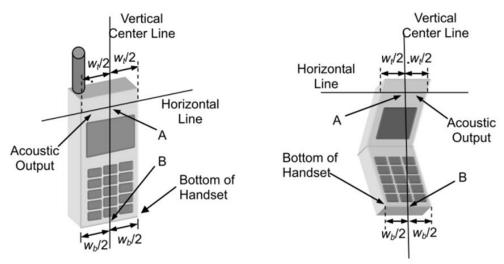


8. EUT Test Position

This EUT was tested in Right Cheek, Right Titled, Left Cheek, Left Titled, Front Face and Rear Face.

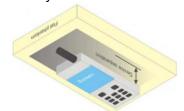
8.1 Define Two Imaginary Lines On The Handset

- (1)The vertical centerline passes through two points on the front side of the handset the midpoint of the width wt of the handset at the level of the acoustic output, and the midpoint of the width wb of the handset.
- (2) The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output. The horizontal line is also tangential to the face of the handset at point A.
- (3)The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily to the front face of the handset, especially for clamshell handsets, handsets with flip covers, and other irregularly shaped handsets.



Body-worn Position Conditions:

Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in KDB Publication 447498 D01 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. When the same wireless transmission configuration is used for testing body-worn accessory and hotspot mode SAR, respectively, in voice and data mode, SAR results for the most conservative *test separation distance* configuration may be used to support both SAR conditions. When the *reported* SAR for a body-worn accessory, measured without a headset connected to the handset, is > 1.2 W/kg, the highest *reported* SAR configuration for that wireless mode and frequency band should be repeated for the body-worn accessory with a headset attached to the handset.







9. Uncertainty

9.1 Measurement Uncertainty

The following measurement uncertainty levels have been estimated for tests performed on the EUT as specified in IEEE 1528: 2013. This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

NO	Source	Tol(%)	Prob. Dist.	Div. k	ci (1g)	ci (10g)	1gUi	10gUi	Veff
Measi	urement System□								
1	Probe calibration	5.8	N	1	1	1	5.8	5.8	8
2	Axial isotropy	3.5	R	√3	(1-cp) ^{1/2}	(1-cp) ^{1/2}	1.43	1.43	8
3	Hemispherical isotropy	5.9	R	√3	√Cp	√Cp	2.41	2.41	8
4	Boundary effect	1.0	R	√3	1	1	0.58	0.58	8
5	Linearity	4.7	R	√3	1	1	2.71	2.71	8
6	System Detection limits	1.0	R	√3	1	1	0.58	0.58	8
7	Readout electronics	0.5	N	1	1	1	0.50	0.50	8
8	Response time	0	R	√3	1	1	0	0	8
9	Integration time	1.4	R	√3	1	1	0.81	0.81	8
10	Ambient noise	3.0	R	√3	1	1	1.73	1.73	8
11	Ambient reflections	3.0	R	√3	1	1	1.73	1.73	8
12	Probe positioner mech. restrictions	1.4	R	√3	1	1	0.81	0.81	8
13	Probe positioning with respect to phantom shell	1.4	R	√3	1	1	0.81	0.81	8
14	Max.SAR evaluation	1.0	R	√3	1	1	0.6	0.6	8
Test s	ample related								
15	Device positioning	2.6	N	1	1	1	2.6	2.6	11



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16	Device holder	3	N	1	1	1	3.0	3.0	7
17	Drift of output power	5.0	R	√3	1	1	2.89	2.89	∞
Phantom and set-up									
18	Phantom uncertainty	4.0	R	√3	1	1	2.31	2.31	8
19	Liquid conductivity (target)	2.5	N	1	0.78	0.71	1.95	1.78	5
20	Liquid conductivity (meas)	4	N	1	0.23	0.26	0.92	1.04	5
21	Liquid Permittivity (target)	2.5	N	1	0.78	0.71	1.95	1.78	8
22	Liquid Permittivity (meas)	5.0	N	1	0.23	0.26	1.15	1.30	8
Comb	nined standard	2	$U_{c} = \sqrt{\sum_{i=1}^{n} C_{i}^{2} U_{i}^{2}}$				10.63%	10.54%	
Expai (P=95	nded uncertainty 5%)	U = k $U_{\scriptscriptstyle C}$,k=2					21.26%	21.08%	



9.2 System validation Uncertainty

		Γ				Т	ı		1
NO	Source	Tol(%)	Prob. Dist.	Div. k	ci (1g)	ci (10g)	1gUi	10gUi	Veff
Meas	urement System□								
1	Probe calibration	5.8	N	1	1	1	5.8	5.8	&
2	Axial isotropy	3.5	R	√3	(1-cp) ^{1/2}	(1-cp) ^{1/2}	1.43	1.43	8
3	Hemispherical isotropy	5.9	R	√3	$\sqrt{C_p}$	√Cp	2.41	2.41	8
4	Boundary effect	1.0	R	√3	1	1	0.58	0.58	8
5	Linearity	4.7	R	√3	1	1	2.71	2.71	8
6	System Detection limits	1.0	R	√3	1	1	0.58	0.58	8
7	Modulation response	0	N	1	1	1	0	0	8
8	Readout electronics	0.5	N	1	1	1	0.50	0.50	8
9	Response time	0	R	√3	1	1	0	0	8
10	Integration time	1.4	R	√3	1	1	0.81	0.81	80
11	Ambient noise	3.0	R	√3	1	1	1.73	1.73	8
12	Ambient reflections	3.0	R	√3	1	1	1.73	1.73	8
13	Probe positioner mech. restrictions	1.4	R	√3	1	1	0.81	0.81	8
14	Probe positioning with respect to phantom shell	1.4	R	√3	1	1	0.81	0.81	8
15	Max.SAR evaluation	1.0	R	√3	1	1	0.6	0.6	8
Dipole	9								
16	Deviation of experimental source from	4	N	1	1	1	4.00	4.00	8



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17	Input power and SAR drit measurement	5	R	√3	1	1	2.89	2.89	8
18	Dipole Axis to liquid Distance	2	R	√3	1	1			8
Phant	Phantom and set-up								
19	Phantom uncertainty	4.0	R	√3	1	1	2.31	2.31	∞
20	Uncertainty in SAR correction for deviation(in	2.0	N	1	1	0.84	2	1.68	80
21	Liquid conductivity (target)	2	N	1	1	0.84	2.00	1.68	8
22	Liquid conductivity (temperature uncertainty)	2.5	N	1	0.78	0.71	1.95	1.78	5
23	Liquid conductivity (meas)	4	N	1	0.23	0.26	0.92	1.04	5
24	Liquid Permittivity (target)	2.5	N	1	0.78	0.71	1.95	1.78	8
25	Liquid Permittivity (temperature uncertainty)	2.5	N	1	0.78	0.71	1.95	1.78	5
26	Liquid Permittivity (meas)	5.0	N	1	0.23	0.26	1.15	1.30	8
Comb	nined standard		RSS	U	$C_C = \sqrt{\sum_{i=1}^n C_i^2 U_i}$	2	10.15%	10.05%	

U = k $U_{\scriptscriptstyle C}$,k=2

20.29%

20.10%

Expanded uncertainty (P=95%)



10. Conducted Power Measurement

10.1 Test Result

	Burst Average Power (dBm)						
Band		GSM 850			PCS 1900		
Channel	128	190	251	512	661	810	
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880.0	1909.8	
GPRS (GMSK, 1-Slot)	31.48	31.42	31.34	27.96	27.93	27.91	
GPRS (GMSK, 2-Slot)	31.07	30.96	30.94	27.50	27.45	27.50	
GPRS (GMSK, 3-Slot)	30.67	30.50	30.48	27.00	26.97	27.03	
GPRS (GMSK, 4-Slot)	30.23	30.08	29.98	26.52	26.49	26.63	
EGPRS(8PSK, 1-Slot)	31.42	31.39	31.31	27.93	27.91	27.88	
EGPRS(8PSK, 2-Slot)	30.86	30.75	30.65	27.30	27.22	27.22	
EGPRS(8PSK, 3-Slot)	30.44	30.25	30.20	26.73	26.77	26.77	
EGPRS(8PSK, 4-Slot)	29.95	29.88	29.77	26.23	26.29	26.37	

Remark: GPRS, CS4 coding scheme. EGPRS, MCS9 coding scheme.

Multi-Slot Class 8, Support Max 4 downlink, 1 uplink, 5 working link

Multi-Slot Class 10, Support Max 4 downlink, 2 uplink, 5 working link

Multi-Slot Class 12, Support Max 4 downlink, 4 uplink, 5 working link

	Fram- Average Power(dBm)						
Band		GSM 850	PCS 1900				
Channel	128	190	251	512	661	810	
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880.0	1909.8	
GPRS (GMSK, 1-Slot)	22.45	22.39	22.31	18.93	18.90	18.88	
GPRS (GMSK, 2-Slot)	22.04	21.93	21.91	18.47	18.42	18.47	
GPRS (GMSK, 3-Slot)	24.65	24.48	24.46	20.98	20.95	21.01	
GPRS (GMSK, 4-Slot)	25.97	25.82	25.72	22.26	22.23	22.37	
EGPRS(8PSK, 1-Slot)	28.41	28.38	28.30	24.92	24.90	24.87	
EGPRS(8PSK, 2-Slot)	21.83	21.72	21.62	18.27	18.19	18.19	
EGPRS(8PSK, 3-Slot)	24.42	24.23	24.18	20.71	20.75	20.75	
EGPRS(8PSK, 4-Slot)	25.69	25.62	25.51	21.97	22.03	22.11	

Remark:

- 1. SAR testing was performed on the maximum frame-averaged power mode.
- 2. The frame-averaged power is linearly proportion to the slot number configured and it is linearly scaled the maximum

burst-averaged power based on time slots. The calculated method is shown as below:

Frame-averaged power = Burst averaged power (1 Tx Slot) – 9.03 dB

Frame-averaged power = Burst averaged power (2 Tx Slots) - 6.02 dB

Frame-averaged power = Burst averaged power (3 Tx Slots) - 4.26 dB

Frame-averaged power = Burst averaged power (4 Tx Slots) – 3.01 dB



WCDMA

Band	WC	DMA Ban	id V	W	CDMA Band	d II
Channel	4132	4183	4233	9262	9400	9538
Frequency (MHz)	826.4	836.6	846.6	1852.4	1880.0	1907.6
AMR 12.2Kbps	22.78	22.76	22.75	21.48	21.58	21.37
RMC 12.2Kbps	22.97	22.96	22.95	22.69	22.74	22.62
HSDPA Subtest-1	22.95	22.93	22.91	22.65	22.72	22.59
HSDPA Subtest-2	22.52	22.51	22.42	22.23	22.31	22.12
HSDPA Subtest-3	22.13	22.08	22.02	21.78	21.86	21.68
HSDPA Subtest-4	21.75	21.69	21.56	21.29	21.37	21.32
HSUPA Subtest-1	22.87	22.86	22.45	22.64	22.68	22.12
HSUPA Subtest-2	21.89	21.89	21.51	21.81	21.73	21.18
HSUPA Subtest-3	21.84	21.46	21.15	21.67	21.30	20.69
HSUPA Subtest-4	21.44	21.12	20.75	21.35	20.82	20.25
HSUPA Subtest-5	19.94	19.62	19.26	19.87	19.39	18.81

According to 3GPP 25.101 sub-clause 6.2.2, the maximum output power is allowed to be reduced by following the table.

Table 6.1A: UE maximum output power with HS-DPCCH and E-DCH

UE Transmit Channel Configuration	CM(db)	MPR(db)
For all combinations of ,DPDCH,DPCCH HS-DPDCH,E-DPDCH and E-DPCCH	0≤ CM≤3.5	MAX(CM-1,0)

Note: CM=1 for β c/ β d=12/15, β hs/ β c=24/15.For all other combinations of DPDCH, DPCCH, HS-DPCCH,

E-DPDCH and E-DPCCH the MPR is based on the relative CM difference.

The device supports MPR to solve linearity issues (ACLR or SEM) due to the higher peak-to average ratios (PAR) of the HSUPA signal. This prevents saturating the full range of the TX DAC inside of device and provides a reduced power output to the RF transceiver chip according to the Cubic Metric (a function of the combinations of DPDCH, DPCCH, HS-DPCCH, E-DPDCH and E-DPCCH).

When E-DPDCH channels are present the beta gains on those channels are reduced firsts to try to get the power under the allowed limit. If the beta gains are lowered as far as possible, then a hard limiting is applied at the maximum allowed level.

The SW currently recalculates the cubic metric every time the beta gains on the E-DPDCH are reduced. The cubic metric will likely get lower each time this is done .However, there is no reported reduction of maximum output power in the HSUPA mode since the device also provides a compensation for the power back-off by increasing the gain of TX_AGC in the transceiver (PA) device.

The end effect is that the DUT output power is identical to the case where there is no MPR in the device.



BLE

Mode	Channel Number	Frequency (MHz)	Average Power (dBm)
	0	2402	-9.98
GFSK(1Mbps)	19	2440	-10.33
	39	2480	-10.20





10.2 Tune-up Power

Mode	GSM850(AVG)	GSM1900(AVG)
GPRS (1 Slot)	31±1dBm	27±1dBm
GPRS (2 Slot)	31±1dBm	27±1dBm
GPRS (3 Slot)	30±1dBm	27±1dBm
GPRS (4 Slot)	30±1dBm	26±1dBm
EDGE (1 Slot)	31±1dBm	27±1dBm
EDGE (2 Slot)	30±1dBm	27±1dBm
EDGE (3 Slot)	30±1dBm	26±1dBm
EDGE (4 Slot)	29±1dBm	26±1dBm

Mode	WCDMA Band V(AVG)	WCDMA Band II(AVG)
AMR	22±1dBm	21±1dBm
RMC	22±1dBm	22±1dBm
HSDPA Subtest-1	22±1dBm	22±1dBm
HSDPA Subtest-2	22±1dBm	22±1dBm
HSDPA Subtest-3	22±1dBm	21±1dBm
HSDPA Subtest-4	21±1dBm	21±1dBm
HSUPA Subtest-1	22±1dBm	22±1dBm
HSUPA Subtest-2	21±1dBm	21±1dBm
HSUPA Subtest-3	21±1dBm	21±1dBm
HSUPA Subtest-4	21±1dBm	21±1dBm
HSUPA Subtest-5	19±1dBm	19±1dBm

Mode	BLE(AVG)
GFSK	-10±1dBm





10.3 SAR Test Exclusions Applied

Per FCC KDB 447498D01, the 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[$\sqrt{f(GHZ)}$] \leq 3.0 for 1-g SAR and \leq 7.5 for 10-g extremity SAR, where:

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

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

$$\frac{\textit{Max Power of Channel (mW)}}{\textit{Test Separation Dist (mm)}} * \sqrt{\textit{Frequency(GHz)}} \le 3.0$$

Based on the maximum conducted power of **Bluetooth Body** (rounded to the nearest mW) and the antenna to user separation distance,

Bluetooth Body SAR was not required; $[0.126/5)^* \sqrt{2.480} = 0.04 < 3.0$.

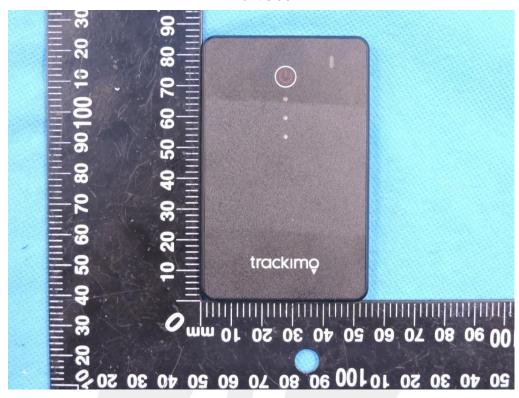




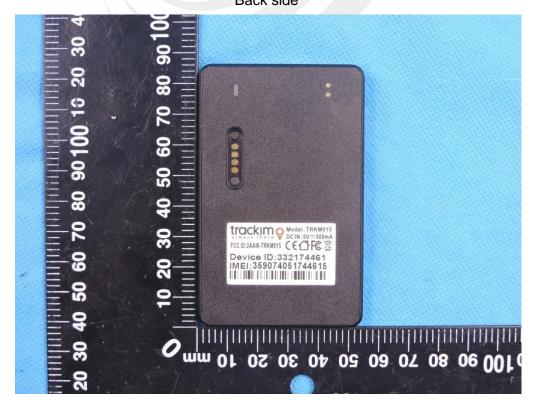
11. EUT And Test Setup Photo

11.1 EUT Photo





Back side





Top side

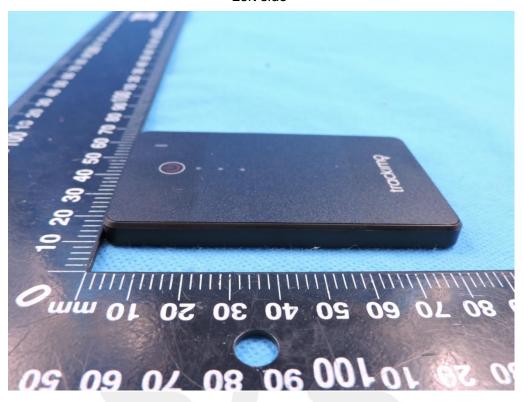


Bottom side





Left side

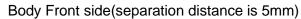


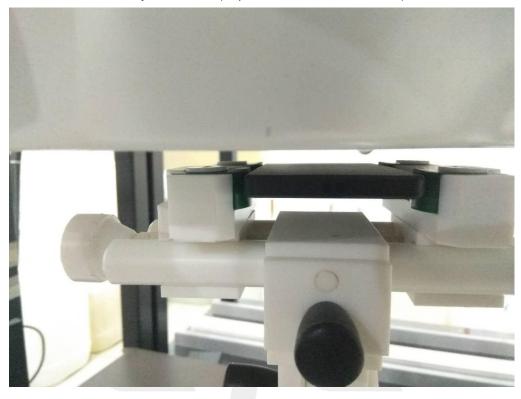
Right side



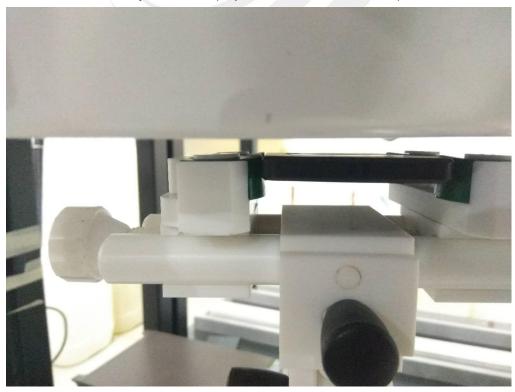


11.2 Setup Photo





Body Back side(separation distance is 5mm)

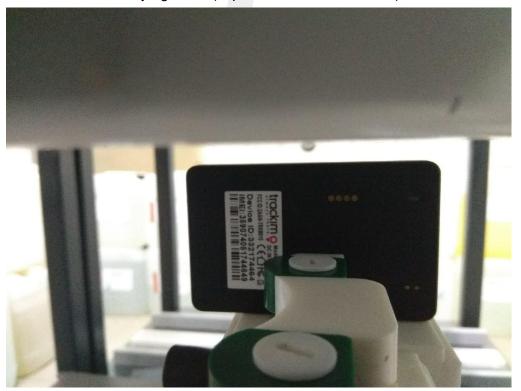




Body left side(separation distance is 5mm)



Body right side(separation distance is 5mm)





Body top side(separation distance is 5mm)



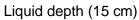
Body Bottom side(separation distance is 5mm)

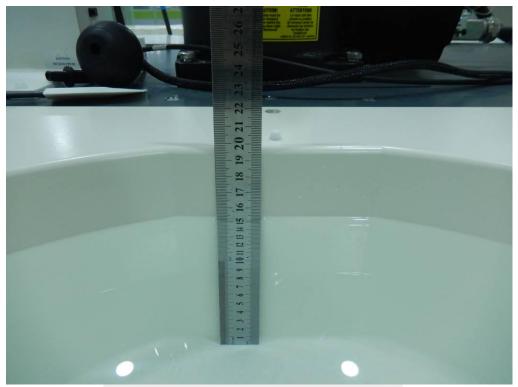
















12. SAR Result Summary

12.1 Body-worn and Hotspot SAR

Band	Mode	Test Position	Ch.	Result 1g (W/Kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas. No.
		Front side	128	0.960	3.07	31	30.23	1.146	1
		Front side	190	0.879	2.21	31	30.08	1.086	/
		Front side	251	0.768	3.72	31	29.98	0.971	/
GSM 850	GPRS	Back side	128	0.928	0.69	31	30.23	1.108	/
GSIVI 650	Data-4 Slot	Back side	128	0.843	3.05	31	30.08	1.042	/
		Back side	190	0.783	-1.69	31	29.98	0.990	/
		Right side	128	0.617	-0.11	31	30.23	0.737	/
		Top side	128	0.762	-3.82	31	30.23	0.910	/
		Front side	512	0.927	2.92	27	26.52	1.035	/
		Front side	661	0.842	-2.86	27	26.49	0.947	/
		Front side	810	1.021	3.37	27	26.63	1.112	2
GSM1900	GPRS	Back side	512	0.875	-0.07	27	26.52	0.977	/
GSW1900	Data-4 Slot	Back side	661	0.798	-2.04	27	26.49	0.897	/
		Back side	810	0.969	1.38	27	26.63	1.055	/
		Right side	810	0.509	0.31	27	26.63	0.554	/
		Top side	810	0.697	1.25	27	26.63	0.759	/
		Front side	9400	0.595	-2.93	23	22.72	0.635	/
WCDMA	RMC	Back side	9400	0.661	-0.02	23	22.72	0.705	3
II	RIVIC	Right side	9400	0.351	2.88	23	22.72	0.374	/
		Top side	9400	0.489	-3.99	23	22.72	0.522	/
		Front side	4132	0.560	3.37	23	22.95	0.566	/
WCDMA	RMC	Back side	4132	0.683	0.54	23	22.95	0.691	4
V	KIVIC	Right side	4132	0.366	0.89	23	22.95	0.370	/
		Top side	4132	0.520	0.85	23	22.95	0.526	/

Note:

- 1. The test separation of all above table is 5mm.
- 2. Per KDB 447498 D01v05r01, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For WWAN: Scaled SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
- 3. When the user enables the personal Wireless router functions for the handsets, actual operations include simultaneous transmission of both the Wi-Fi transmitting frequency and thus cannot be evaluated for SAR under actual use conditions. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.





Repeated SAR

Band	Mode	Test Position	Ch.	Result 1g (W/Kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)
GSM 850	GPRS Data-4 Slot	Front side	128	0.913	1.69	31	30.23	1.090
GSM 850	GPRS Data-4 Slot	Back side	128	0.899	-2.46	31	30.23	1.073
GSM 1900	GPRS Data-4 Slot	Front side	810	0.978	2.31	27	26.63	1.065
GSM 1900	GPRS Data-4 Slot	Back side	810	0.937	-3.43	27	26.63	1.020

12.2 repeated SAR measurement

Band	Mode	Test Position	Ch.	Original Measured SAR 1g(mW/g)	1 st Repeated SAR 1g	Ratio	Original Measured SAR 1g(mW/g)	2nd Repeated SAR 1g	Ratio
GSM 850	GPRS Data-4 Slot	Front side	128	0.960	0.913	1.05	-	-	-
GSM 850	GPRS Data-4 Slot	Back side	128	0.928	0.899	1.03	-	-	-
GSM 1900	GPRS Data-4 Slot	Front side	810	1.021	0.978	1.04	-	-	-
GSM 1900	GPRS Data-4 Slot	Back side	810	0.969	0.937	1.03	-	-	-

Note:

- 1. Per KDB 865664 D01,for each frequency band ,repeated SAR measurement is required only when the measured SAR is ≥0.8W/Kg.
- 2. Per KDB 865664 D01,if the ratio of largest to smallest SAR for the original and first repeated measurement is≤1.2and the measured SAR<1.45W/Kg, only one repeated measurement is required.
- 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 ≥ 1.45W/Kg
- 4. The ratio is the difference in percentage between original and repeated measured SAR.





Simultaneous Multi-band Transmission Evaluation:

Application Simultaneous Transmission information:

Position	Simultaneous state	
	1. GSM + Bluetooth	
Body	2. WCDMA + Bluetooth	

NOTE:

- 1. Bluetooth and WLAN can't simultaneous transmission at the same time.
- 2. For simultaneous transmission at head and body exposure position, 2 transmitters simultaneous transmission was the worst state.
- 3. Based upon KDB 447498 D01, BT SAR is excluded as below table.
- 4. If the test separation distance is <5mm, 5mm is used for excluded SAR calculation.
- 5. For minimum test separation distance \leq 50mm,Bluetooth standalone SAR is excluded according to [(max. power of channel, including tune-up tolerance, mW)/ (min. test separation distance, mm) $\cdot [\sqrt{f} (GHz)/x] \leq 3.0$ for 1-g SAR and \leq 7.5 for 10-g extremity SAR
- 6. The reported SAR summation is calculated based on the same configuration and test position.
- 7. KDB 447498 / 4.3.2 (2) when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:
 - a) (max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[\sqrt{f} (GHz) /x] W/kg for test separation distances \leq 50 mm; Where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.
 - b) 0.4W/Kg for 1-g SAR and 1.0W/Kg for 10-g SAR, when the separation distance is >50mm.

Estimated SAR		Maximu	ım Power	Antenna	Frequency(GHz)	Stand alone	
		dBm	mW	to user(mm)	1 7()	SAR(1g) [W/kg]	
ВТ	Body	-9	0.631	5	2.480	0.005	

Simultaneous Mode	Position	Mode	Max. 1-g SAR (W/kg)	1-g Sum SAR (W/kg)
	Pody	GSM Data	1.146	1.151
GSM + Bluetooth	Body	Bluetooth	0.005	1.131
	D. J.	WCDMA RMC	0.705	0.710
	Body	Bluetooth	0.005	0.710

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

When the sum of SAR 1g of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit (SAR-1g 1.6 W/kg), the simultaneous transmission SAR is not required. When the sum of SAR 1g is greater than the SAR limit (SAR-1g 1.6 W/kg), SAR test exclusion is determined by the SPLSR.



13. Equipment List

Kind of Equipment	Manufacturer	Type No.	Serial No.	Last Calibration	Calibrated Until
835MHz Dipole	MVG	SID835	SN 30/14 DIP0G835-332	2017.08.15	2020.08.14
1900MHz Dipole	MVG	SID1900	SN 30/14 DIP1G900-333	2017.08.15	2020.08.14
E-Field Probe	MVG	SSE5	SN 14/16 EP309	2017.12.15	2018.12.14
Dielectric Probe Kit	MVG	SCLMP	SN 32/14 OCPG67	2017.12.03	2018.12.02
Antenna	MVG	ANTA3	SN 07/13 ZNTA52	N/A	N/A
Phantom1	MVG	SAM	SN 32/14 SAM115	2014.09.01	N/A
Phantom2	MVG	SAM	SN 32/14 SAM116	2014.09.01	N/A
Phone holder	MVG	N/A	SN 32/14 MSH97	2014.09.01	N/A
Laptop holder	MVG	N/A	SN 32/14 LSH29	2014.09.01	N/A
Network Analyzer	Agilent	8753ES	US38432810	2017.03.16	2018.03.15
Multi Meter	Keithley	Multi Meter 2000	4050073	2017.10.15	2018.10.14
Signal Generator	Agilent	N5182A	MY50140530	2017.10.15	2018.10.14
Wireless Communication Test Set	Agilent	8960-E5515C	MY48360751	2017.10.15	2018.10.14
Wireless Communication Test Set	R&S	CMW500	117239	2017.10.15	2018.10.14
Power Amplifier	DESAY	ZHL-42W	9638	2017.10.15	2018.10.14
Power Meter	R&S	NRP	100510	2017.10.15	2018.10.14
Power Meter	Agilent	E4418B	GB43312526	2017.10.15	2018.10.14
Power Sensor	R&S	NRP-Z11	101919	2017.10.15	2018.10.14
Power Sensor	Agilent	E9301A	MY41497725	2017.10.15	2018.10.14
9dB Attenuator	Agilent	99899	DC-18GHz	2017.05.10	2018.05.09
11dB Attenuator	Agilent	8494B	DC-18GHz	2017.05.10	2018.05.09
110dB Attenuator	Agilent	8494B	DC-18GHz	2017.05.10	2018.05.09
Directional coupler	Narda	4226-20	3305	2017.10.15	2018.10.14
hygrothermograph	MiEO	HH660	N/A	2017.10.18	2018.10.17
Thermograph	Elitech	RC-4	S/N EF7176501537	2017.11.10	2018.11.09



Appendix A. System Validation Plots

System Performance Check Data (835MHz Body)

Type: Phone measurement (Complete)
Area scan resolution: dx=8mm,dy=8mm

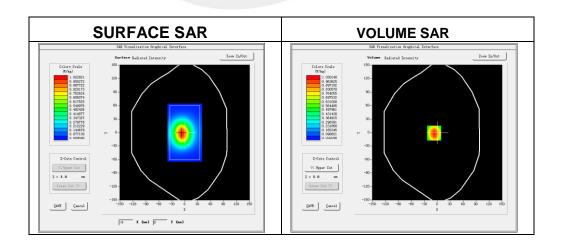
Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2017-12-26

Measurement duration: 14 minutes 13 seconds

Experimental conditions.

Probe			
Phantom	Validation plane		
Device Position	-		
Band	835MHz		
Channels			
Signal	CW		
Frequency (MHz)	835MHz		
Relative permittivity	55.18		
Conductivity (S/m)	0.96		
Power drift (%)	1.34		
Probe	SN 14/16 EP309		
ConvF:	5.90		
Crest factor:	1:1		

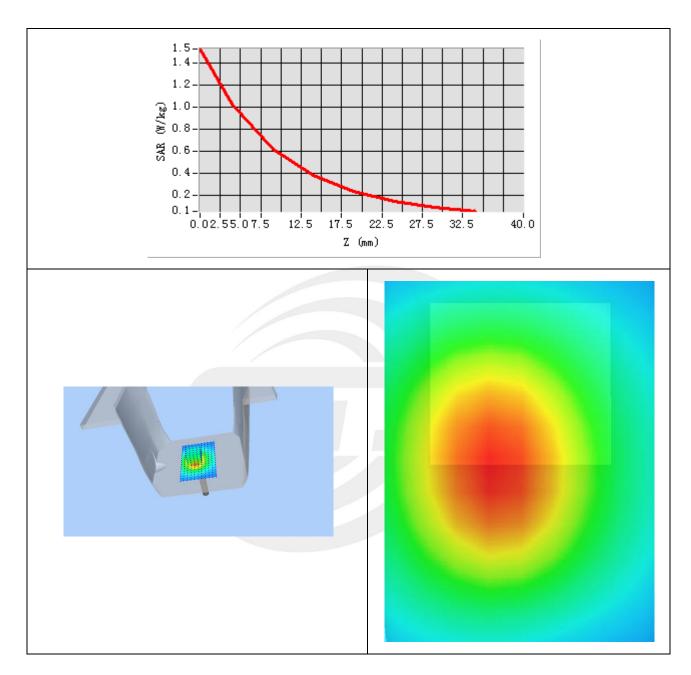


Maximum location: X=-7.00, Y=-1.00

SAR 10g (W/Kg)	0.5987145
SAR 1g (W/Kg)	0.957407



Z Axis Scan





System Performance Check Data (1900MHz Body)

Type: Phone measurement (Complete)
Area scan resolution: dx=8mm,dy=8mm

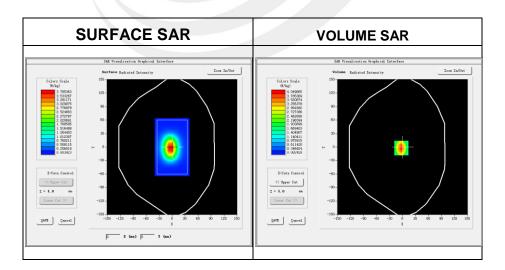
Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm

Date of measurement: 2017-12-26

Measurement duration: 14 minutes 46 seconds

Experimental conditions.

Device Position	-		
Band	1900MHz		
Channels	-		
Signal	CW		
Frequency (MHz)	1900		
Relative permittivity	53.78		
Conductivity (S/m)	1.54		
Power drift (%)	-0.10		
Probe	SN 14/16 EP309		
ConvF:	5.67		
Crest factor:	1:1		

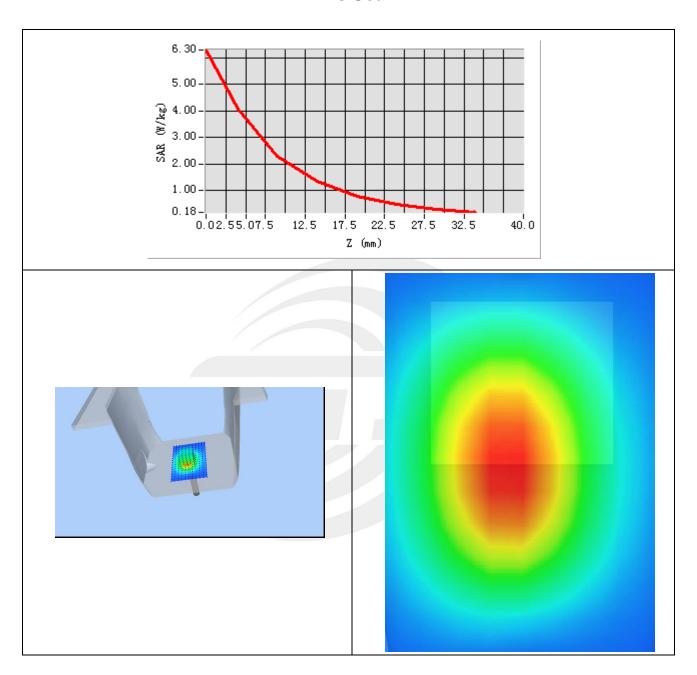


Maximum location: X=-3.00, Y=-2.00

SAR 10g (W/Kg)	2.117007
SAR 1g (W/Kg)	3.991378



Z Axis Scan







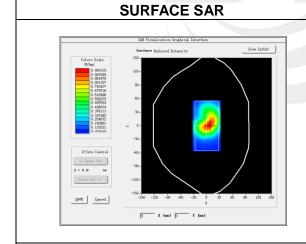
Appendix B. SAR Test Plots

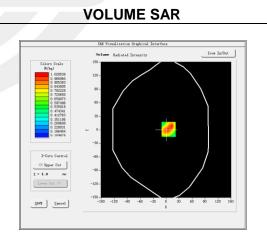
Plot 1: DUT: GPS Tracker; EUT Model: TRKM015

Test Date	2017-12-26
Probe	SN 14/16 EP309
ConvF	5.90
Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm, Complete/ndx=8mm dy=8mm, h= 5.00 mm
Phantom	Validation plane
Device Position	Body front side
Band	GPRS 850
Channels	Low
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)
Frequency (MHz)	824.2
Relative permittivity (real part)	55.20
Conductivity (S/m)	0.97
Variation (%)	3.07

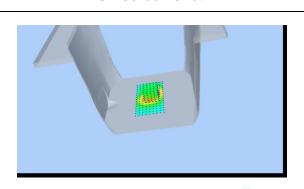
Maximum location: X=6.00, Y=1.00 SAR Peak: 1.58 W/kg

SAR 10g (W/Kg)	0.602046
SAR 1g (W/Kg)	0.960106

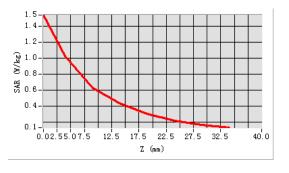




3D screen shot



Z Axis Scan



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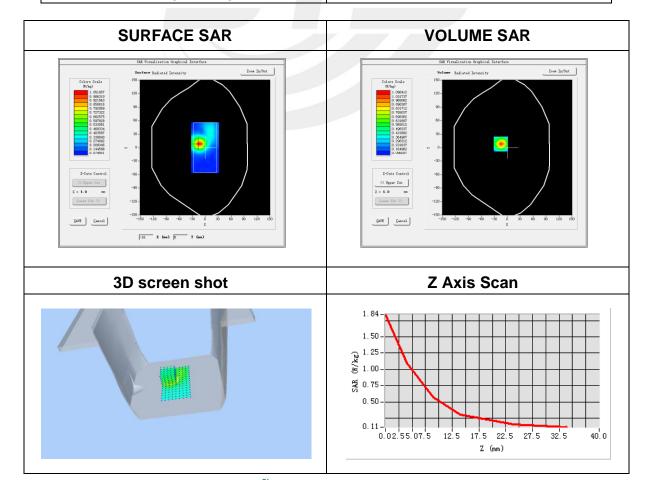


Plot 2: DUT: GPS Tracker; EUT Model: TRKM015

Test Date	2017-12-26
Probe	SN 14/16 EP309
ConvF	5.67
Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm, Complete/ndx=8mm dy=8mm, h= 5.00 mm
Phantom	Validation plane
Device Position	Body front side
Band	GPRS 1900
Channels	High
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)
Frequency (MHz)	1909.8
Relative permittivity (real part)	53.30
Conductivity (S/m)	1.52
Variation (%)	3.37

Maximum location: X=-15.00, Y=8.00 SAR Peak:1.82 W/kg

SAR 10g (W/Kg) 0.513802 SAR 1g (W/Kg) 1.021019



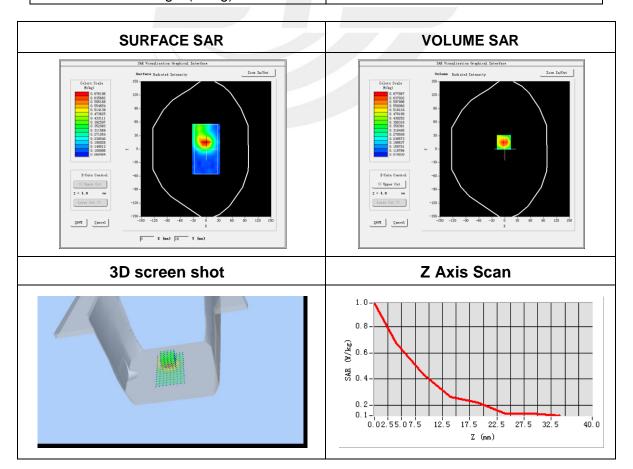


Plot 3: DUT: GPS Tracker; EUT Model: TRKM015

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Test Date	2017-12-26
Probe	SN 14/16 EP309
ConvF	5.67
Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,
	Complete/ndx=8mm dy=8mm, h= 5.00 mm
Phantom	Validation plane
Device Position	Body back side
Band	WCDMA II
Channels	Middle
Signal	WCDMA (Crest factor: 1.0)
Frequency (MHz)	1880.0
Relative permittivity (real part)	53.30
Conductivity (S/m)	1.52
Variation (%)	-0.02

Maximum location: X=-2.00, Y=15.00 SAR Peak: 1.05 W/kg

SAR 10g (W/Kg)	0.384459
SAR 1g (W/Kg)	0.660862



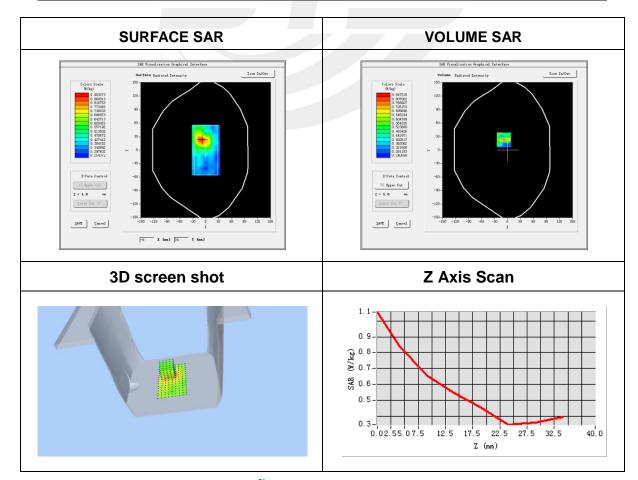


Plot 4: DUT: GPS Tracker; EUT Model: TRKM015

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Test Date	2017-12-26
Probe	SN 14/16 EP309
ConvF	5.90
Area Scan	dx=8mm dy=8mm, h= 5.00 mm
ZoomScan	5x5x7,dx=8mm dy=8mm dz=5mm,
	Complete/ndx=8mm dy=8mm, h= 5.00 mm
Phantom	Validation plane
Device Position	Body back side
Band	WCDMA V
Channels	Low
Signal	WCDMA (Crest factor: 1.0)
Frequency (MHz)	826.4
Relative permittivity (real part)	55.20
Conductivity (S/m)	0.97
Variation (%)	0.54

Maximum location: X=-9.00, Y=23.00 SAR Peak: 1.05 W/kg

SAR 10g (W/Kg)	0.504740
SAR 1g (W/Kg)	0.682607







Appendix C. Probe Calibration And Dipole Calibration Report

Refer the appendix Calibration Report.

