

# FCC SAR TEST REPORT

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# Report No.: STS2005254H01

Issued for

Trackimo INC.

450 Seventh Avenue, Suite 1408, New York, United States

Product Name:	GPS Tracker			
Brand Name:	trackimo			
Model Name:	TRKM110			
Series Model:	N/A			
FCC ID:	2AAI6-TRKM110			
	ANSI/IEEE Std. C95.1			
Test Standard:	FCC 47 CFR Part 2 ( 2.1093)			
	IEEE 1528: 2013			
Max. Report SAR (1g):	Body: 1.321W/kg			

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Bao'an District

henzhen.

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# **Test Report Certification**

Applicant's name:	Trackimo INC.
Address:	450 Seventh Avenue, Suite 1408, New York, United States
Manufacture's Name	Trackimo INC.
Address	450 Seventh Avenue, Suite 1408, New York, United States
Product description	
Product name:	GPS Tracker
Brand name:	trackimo
Model name:	TRKM110
Series Model:	N/A
Standards	ANSI/IEEE Std. C95.1-1992 FCC 47 CFR Part 2 ( 2.1093) IEEE 1528: 2013
themeasurement methodsand reportapply only to the term	Shenzhen STS Test Services Co., Ltd. in accordance with procedures specified in KDB 865664 The test results in this sted sample of thestated device/equipment. Other similar sarily produce the same results due toproduction tolerance and
Date of Test	
Date (s) of performance of tests	: 01 June 2020~02 June 2020
Date of Issue	: 05 June 2020
Test Result	Pass

Testing Engineer :	Aann 13u
	( Aaron Bu)
Technical Manager :	Juson Ju APPROVAL
	(Jason Lu)
Authorized Signatory :	Vitati
	(Vita Li)

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### **Revision History**

Rev.	Issue Date	Report No.	Effect Page	Contents			
00	05 June 2020	STS2005254H01	ALL	Initial Issue			
Note: Format version of the report-V01							



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### **1. General Information**

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head andbody 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 EUT Description									
Product Name		GPS Tracker							
Brand Name		trackimo							
Model Name		TRKM110							
Series Model	N/A								
Model Difference	N/A								
		Rated Voltage: 3.6V							
Battery		Charge Limit: 4.2V							
		/: 10000mAh							
Device Category	Portable								
Product stage	Producti	on unit							
RF Exposure Environment	General	Population / Uncontrolle	d						
	0.04.00								
Hardware Version		76_2.0(05.14)							
Software Version	V1.0								
	7 -	0:824.2~848.8MHz							
		0:1850.2~1909.8MHz							
Frequency Range		Band II:1852.4~1907.							
		Band V:826.4~846.6N	/Hz						
	Bluetoo	h:2402~2480MHz	De sk M/ s se						
	Band	Mode	BodyWorn						
Max. Reported	PCE	CSM 950	(W/kg) 1.321						
•	PCE	GSM 850 GSM 1900	1.080						
SAR(1g):	PCE	WCDMA Band II	1.221						
(Limit:1.6W/kg)	PCE	WCDMA Band N WCDMA Band V	0.596						
	DSS	Bluetooth <sup>Note</sup>	0.014						
1-g Sum SAR	000	Didctooth	1.335						
	Liconco	d Portable Transmitter							
FCCEquipment Class									
		ransmission System (D	DTS)						
		SM Voice; GPRS							
Operating Mode:		A:RMC,HSDPA,HSUPA	Release 6						
	BLE								
Antenna Specification:		CDMA: PIFA Antenna							
•	BT: PIFA Antenna								
SIM Card	Only sin	Only single card							
Hotspot Mode:	Not Support								
DTM Mode:	Not Support								
Note: 1.Bluetooth SAR was esti 2. The EUT battery mu uniformpower		y charged and checke	ed periodically during the test to ascertain						

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### **1.2 Test Environment**

Ambient conditions in the SAR laboratory:

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

# 1.3 Test Factory

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A 1/F, Building B, Zhuoke Science Park, No.190 Chongqing Road, HepingShequ, Fuyong Sub-District, Bao'an District, Shenzhen, Guang Dong, China

FCC test Firm Registration No.: 625569

IC Registration No.: 12108A

A2LA Certificate No.: 4338.01



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# 2. Test Standardsand 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 D01v06	GPS Tracker and Portable Device RF Exposure Procedures and Equipment Authorization Policies
5	FCC KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz
6	FCC KDB 865664 D02 v01r02	RF Exposure Reporting
7	FCC KDB 941225 D01v03r01	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

NOTE: Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram 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.

4.0

#### 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

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# 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 andgeneral 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 ( $\rho$ ). 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

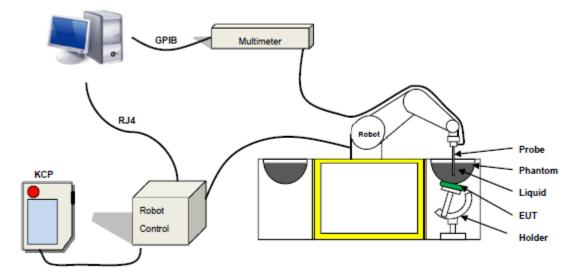
 $SAR = \frac{\sigma E^2}{\rho}$ 

Where:  $\sigma$  is the conductivity of the tissue,

ρ 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

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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 14/16EP309 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter: 5 mm
- Length of Individual Dipoles: 4.5mm
- 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 MHzto 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.

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# 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.

#### Head Tissue

Frequency	cellulose	DGBE	HEC	NaCl	Preventol	Sugar	X100	Water	Conductivity	Permittivity
(MHz)	%	%	%	%	%	%	%	%	σ	٤r
750	0.2	/	/	1.4	0.2	57.0	/	41.1	0.89	41.9
835	0.2	/	/	1.4	0.2	57.9	/	40.3	0.90	41.5
900	0.2	/	/	1.4	0.2	57.9	/	40.3	0.97	41.5
1800	/	44.5	/	0.3	/	1	30.45	55.2	1.4	40.0
1900	/	44.5	/	0.3	1	1	30.45	55.2	1.4	40.0
2000	/	44.5	/	0.3	1	1	/	55.2	1.4	40.0
2450	/	44.9	1	0.1	/	1	/	55.0	1.80	39.2
2600	/	45.0	1	0.1	1	1	/	54.9	1.96	39.0

#### **Body Tissue**

Frequency	cellulose	DGBE	HEC	NaCl	Preventol	Sugar	X100	Water	Conductivity	Permittivity
(MHz)	%	%	%	%	%	%	%	%	σ	٤r
750	0.2	/	/	0.9	0.1	47.2	/	51.7	0.96	55.5
835	0.2	/	/	0.9	0.1	48.2	1	50.8	0.97	55.2
900	0.2	1	1	0.9	0.1	48.2	1	50.8	1.05	55.0
1800	/	29.4	1	0.4	1	1	30.45	70.2	1.52	53.3
1900	/	29.4	1	0.4	1	1	30.45	70.2	1.52	53.3
2000	/	29.4	1	0.4	1	1	/	70.2	1.52	53.3
2450	/	31.3	/	0.1	1	/	/	68.6	1.95	52.7
2600	/	31.7	/	0.1	/	/	/	68.2	2.16	52.3

Tissue dielectric parameters for head and body phantoms								
Frequency	з	r	σ S/m					
	Head	Head Body		Body				
300	45.3	58.2	0.87	0.92				
450	43.5	56.7	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				

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#### LIQUID MEASUREMENT RESULTS

Date		bient dition	Head Simulatir Liquid		Parameters	Target	Measured	Deviation	Limited	
Dale	Temp. [°C]	Humidity [%]	Frequency	Temp. [°C]	Farameters	Target	Measured	[%]	[%]	
2020-06-01	22.9	63	925 MU-	835 MHz 22.6	Permittivity:	41.50	42.05	1.32	±5	
2020-00-01	22.9	03		22.0	Conductivity:	0.90	0.93	2.96	± 5	
2020-06-02	22.5	60	1900 MHz		Permittivity:	40.00	38.34	-4.15	± 5	
2020-06-02	22.5	00		22.3	Conductivity:	1.40	1.35	-3.29	± 5	



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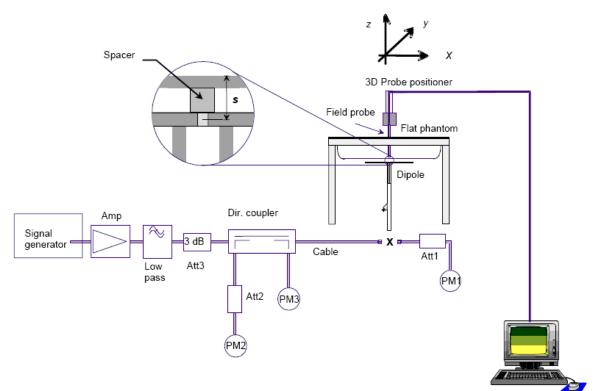


# 5. SAR System Validation

#### 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)	TestedV alue(W/ Kg)	Normalized SAR (W/kg)	Target(W/Kg)	Tolerance(%)	Date
835 Head	100	0.940	9.40	9.63	-2.39	2020-06-01
1900 Head	100	3.926	39.26	39.84	-1.46	2020-06-02

Note:

1. The tolerance limit of System validation ±10%.

2. The dipole input power (forward power) was 100 mW.

3. The results are normalized to 1 W input power.

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# 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 isrequired. 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 forother 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.



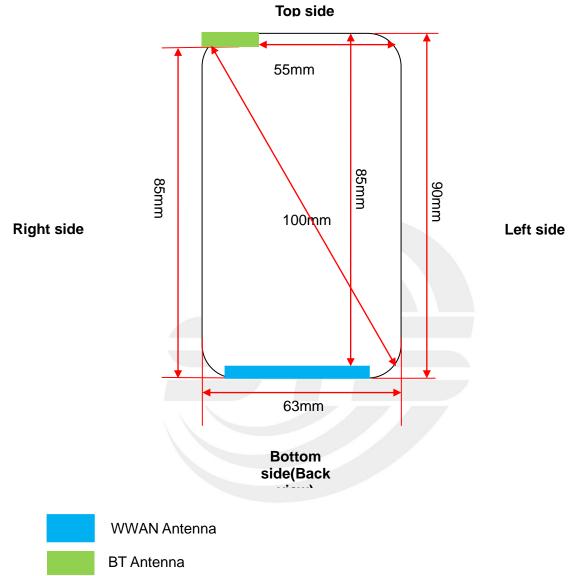


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# 7. EUT Antenna Location Sketch

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



Note 1: The antenna information refer the manufacturer provide report, applicable only to the tested sample identified in the report.

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#### 7.1 SAR testexclusion consider table

According with FCC KDB 447498 D01, appendix A, <SAR test exclusion thresholds for100MHz~6GHz and≤50mm>table, this device SAR test configurations consider as following:

David		Test position configurations										
Band	Front	Back	Right edge	Left edge	Top edge	Bottom edge						
WWAN	<5mm	<5mm	<5mm	55mm	<5mm	85mm						
VVVAIN	Yes	Yes	Yes	Yes	No	Yes						
рт	<5mm	<5mm	<5mm	<5mm	85mm	<5mm						
BT	Yes	Yes	No	Yes	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 edgeconfiguration 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. testseparation 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>
- 5. 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
- 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

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the lower data rate than 11b mode ,thus the SAR can be excluded.

# 8. EUT Test Position

This EUT was tested in Front Face and Rear Face.

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.



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# 9.Uncertainty

### 9.1Measurement 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.

Uncertainty Component	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System								
Probe calibration	5.831	N	1	1	1	5.83	5.83	∞
Axial Isotropy	0.695	R	$\sqrt{3}$	√0.5	√0.5	0.28	0.28	∞
Hemispherical Isotropy	1.045	R	$\sqrt{3}$	√0.5	√0.5	0.43	0.43	∞
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	8
Linearity	0.685	R	$\sqrt{3}$	1	1	0.40	0.40	∞
System detection limits	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	8
Modulation response	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Readout Electronics	0.021	Ν	1	1	1	0.021	0.021	∞
Response Time	0	R	$\sqrt{3}$	1	1	0	0	∞
Integration Time	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
RF ambient	2.0							
conditions-Noise	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
conditions-reflections			10					
Probe positioner mechanical tolerance	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with								
respect to phantom shell	1.4	R	√3	1	1	0.81	0.81	∞
Post-processing	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	∞
Test sample Related	N		<u>v-</u>	1.1	7			
Test sample positioning	2.6	Ν	1	1	1	2.6	2.6	∞
Device holder uncertainty	3	Ν	1	1	1	3	3	∞
SAR drift measurement	5	R	$\sqrt{3}$	1	1	2.89	2.89	8
SAR scaling	5	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Phantom and tissue parame	eters							
Phantom uncertainty(shape	4	R	5	1	1	2.31	2.31	∞
and thickness uncertainty)	4	ĸ	√3	1	I	2.31	2.31	~
Uncertainty in SAR								
correction for deviations in	1.9	N	1	1	0.84	1.90	1.60	∞
permittivity and conductivity								
Liquid conductivity	2.5	R	$\sqrt{3}$	0.78	0.71	1.13	1.02	∞
(temperature uncertainty)			v					
Liquid conductivity (measured)	4	Ν	1	0.78	0.71	3.12	2.84	Μ
Liquid permittivity								
(temperature uncertainty)	2.5	R	$\sqrt{3}$	0.23	0.26	0.33	0.38	∞
Liquid permittivity								
(measured)	5	Ν	1	0.23	0.26	1.15	1.30	М
Combined Standard		<b>D</b> 00				0.70	0.50	
Uncertainty		RSS				9.79	9.59	
Expanded Uncertainty		K=2				19.58	19.18	
(95% Confidence interval)		2				10.00	10110	



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# 9.2 System validation Uncertainty

Uncertainty Component	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	vi
Measurement System	-							
Probe calibration	5.831	N	1	1	1	5.83	5.83	∞
Axial Isotropy	0.695	R	$\sqrt{3}$	1	1	0.40	0.40	∞
Hemispherical Isotropy	1.045	R	$\sqrt{3}$	0	0	0.00	0.00	8
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	8
Linearity	0.685	R	$\sqrt{3}$	1	1	0.40	0.40	8
System detection limits	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	8
Modulation response	3.0	R	$\sqrt{3}$	0	0	0.00	0.00	8
Readout Electronics	0.021	N	1	1	1	0.021	0.021	8
Response Time	0.0	R	$\sqrt{3}$	0	0	0.00	0.00	8
Integration Time	1.4	R	$\sqrt{3}$	0	0	0.00	0.00	8
RF ambient conditions-Noise	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	8
RF ambient conditions-reflections	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	8
Probe positioner mechanical tolerance	1.4	R	$\sqrt{3}$	1	1	0.81	0.81	∞
Probe positioning with respect to phantom shell	1.4	R	√3	1	1	0.81	0.81	8
Post-Processing	2.3	R	$\sqrt{3}$	1	1	1.33	1.33	8
System validation source		•						
Deviation of experimental dipole from numerical dipole	5.0	N	1	1	1	5.00	5.00	8
Input power and SAR drift measurement	5.0	R	√3	1	1	2.89	2.89	8
Other source contribution Uncertainty	2.0	R	√3	1	1	1.15	1.15	8
Phantom and set-up						r	1	
Phantom uncertainty (shape and thickness uncertainty)	4.0	R	√3	1	1	2.31	2.31	8
Uncertainty in SAR correction for deviations in permittivity and conductivity	1.9	N	1	1	0.84	1.90	1.60	8
Liquid conductivity (temperature uncertainty)	2.5	R	√3	0.78	0.71	1.13	1.02	∞
Liquid conductivity (measured)	4	N	1	0.78	0.71	3.12	2.84	М
Liquid permittivity (temperature uncertainty)	2.5	R	$\sqrt{3}$	0.23	0.26	0.33	0.38	8
Liquid permittivity (measured)	5	N	1	0.23	0.26	1.15	1.30	М
Combined Standard Uncertainty		RSS				9.718	9.517	
Expanded Uncertainty (95% Confidence interval)		K=2				19.44	19.04	

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### **10. Conducted Power Measurement**

#### **10.1Test Result**

	Bui	st Average I	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					
GSM(GMSK, 1-Slot)	31.16	31.46	31.36	27.85	27.82	27.80					
GPRS (GMSK, 1-Slot)	30.83	31.07	31.27	27.82	27.75	27.70					
GPRS (GMSK, 2-Slot)	30.38	30.59	30.82	27.41	27.31	27.29					
GPRS (GMSK, 3-Slot)	27.00	26.85	26.86								
GPRS (GMSK, 4-Slot)	29.48	29.73	29.88	26.53	26.38	26.36					
EGPRS(8PSK, 1-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 2-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 3-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 4-Slot)	-	-	-	-	-	-					
Multi-Slot Class 8 , Suppor Multi-Slot Class 10 , Suppor	Remark: GPRS, CS4 coding scheme. EGPRS, MCS5 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	512 661						
Frequency (MHz)	824.2	836.6	848.8	1850.2	1880.0	1909.8					
GSM(GMSK, 1-Slot)	22.13	22.43	22.33	18.82	18.79	18.77					
GPRS (GMSK, 1-Slot)	21.80	22.04	22.24	18.79	18.72	18.67					
GPRS (GMSK, 2-Slot)	24.36	24.57	24.80	21.39	21.29	21.27					
GPRS (GMSK, 3-Slot)	25.67	25.93	26.08	22.74	22.59	22.60					
GPRS (GMSK, 4-Slot)	26.47	26.72	26.87	23.52	23.37	23.35					
EGPRS(8PSK, 1-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 2-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 3-Slot)	-	-	-	-	-	-					
EGPRS(8PSK, 4-Slot)	-	-	-	-	-	-					
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

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#### WCDMA

Band	WC	DMA Bar	nd V	W	CDMA Ban	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	22.32	22.56	22.34	21.52	21.75	21.89
RMC 12.2Kbps	22.35	22.59	22.37	21.59	21.81	21.90
HSDPA Subtest-1	22.30	22.37	22.28	20.16	19.67	20.08
HSDPA Subtest-2	21.80	21.96	21.80	19.69	19.24	19.68
HSDPA Subtest-3	21.38	21.53	21.47	19.26	18.78	19.32
HSDPA Subtest-4	20.89	21.07	21.07	18.91	18.40	18.98
HSUPA Subtest-1	22.07	22.28	22.15	19.67	19.72	19.93
HSUPA Subtest-2	21.22	21.29	21.21	18.72	18.82	18.95
HSUPA Subtest-3	21.11	20.85	20.73	18.65	18.39	18.56
HSUPA Subtest-4	20.74	20.53	20.40	18.24	17.97	18.22
HSUPA Subtest-5	19.30	19.03	18.93	16.77	16.52	16.77

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	0≤ CM≤3.5	MAX(CM-1,0)
HS-DPDCH, E-DPDCH and E-DPCCH	0 < 010 < 0.5	

Note: CM=1 for  $\beta c/\beta d=12/15$ ,  $\beta hs/\beta c=24/15$ . 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 andprovides 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 thepower under the allowed limit. If the beta gains are lowered as far as possible, then a hard limiting is applied atthe 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 maximumoutput 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	-4.85		
GFSK(1Mbps)	19	2440	-5.46		
	39	2480	-6.05		



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## **10.2SAR 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  $\leq$  50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]  $\left[\sqrt{f(GHZ)}\right] \leq 3.0$  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.

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

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

Bluetooth Head SAR was not required;  $[(0.331/5)^* \sqrt{2.480}] = 0.10 < 3.0.$ 



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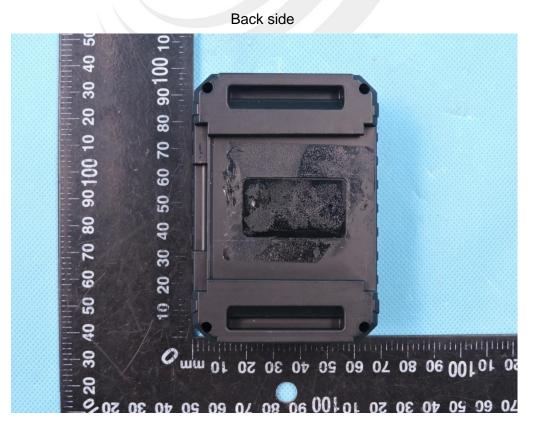


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# 11. EUT And Test Setup Photo

# 11.1 EUT Photo





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### Top side



### Bottom side



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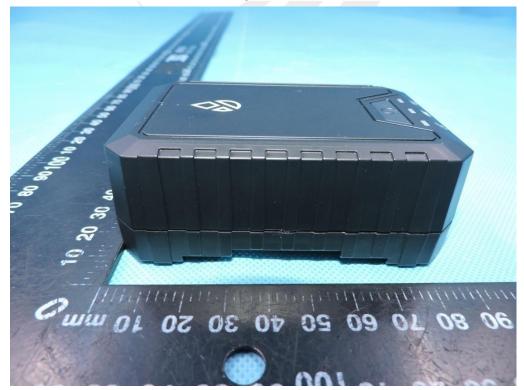


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#### Left side



### **Right side**



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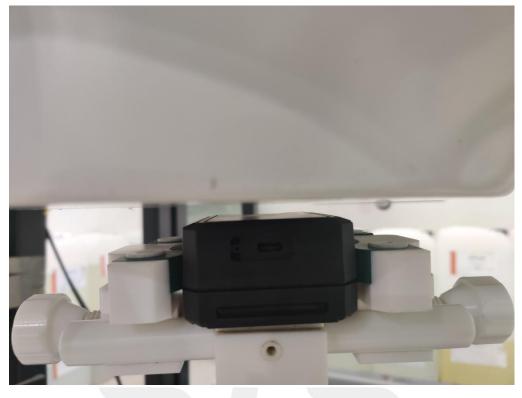
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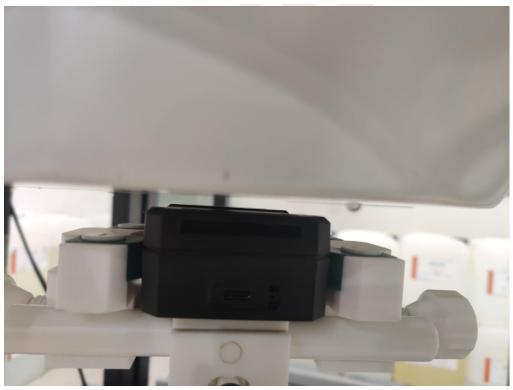
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# 11.2 Setup Photo

#### Body Front side(separation distance is 5mm)



### Body Back side(separation distance is 5mm)



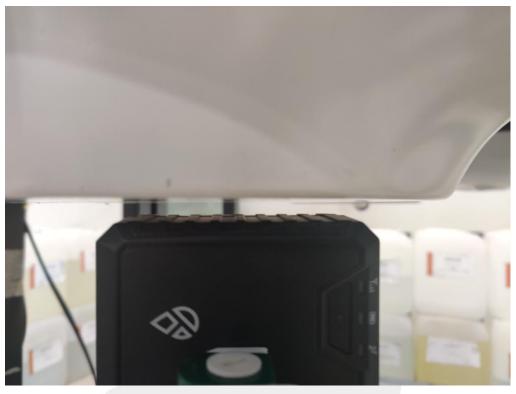
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Body left side(separation distance is 5mm)



Body right side(separation distance is 5mm)



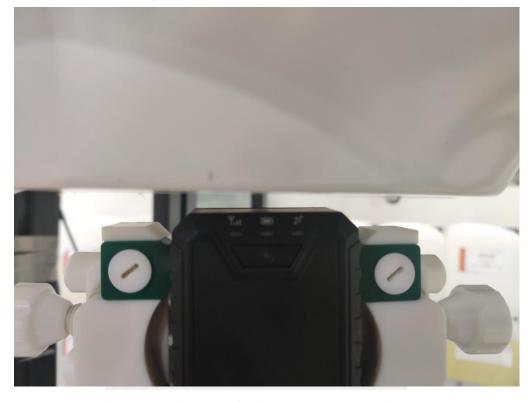
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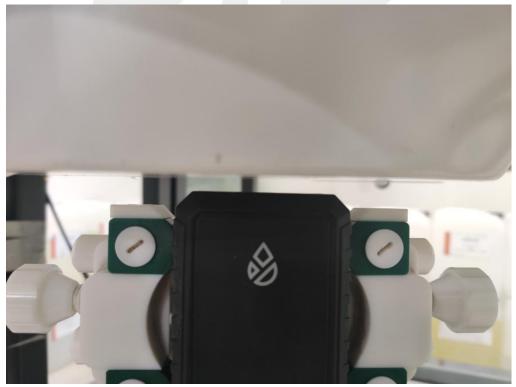
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### Body top side(separation distance is 5mm)



Body Bottom side(separation distance is 5mm)



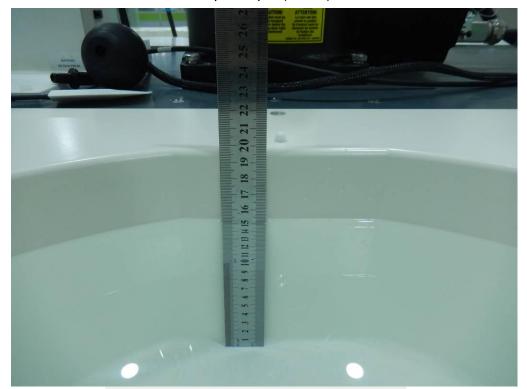
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# Liquid depth (15 cm)





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# 12. SAR Result Summary

### 12.1Body-worn 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	0.829	0.17	30	29.48	0.934	/
		Front side	190	1.062	-1.05	30	29.73	1.130	/
		Front side	251	1.285	-2.26	30	29.88	1.321	1
GSM 850	GSM 850 GPRS Data-4 Slot	Back side	251	0.310	1.04	30	29.88	0.319	/
		Left side	251	0.107	2.83	30	29.88	0.110	/
		Right side	251	0.383	2.75	30	29.88	0.394	/
		Bottom side	251	0.086	1.50	30	29.88	0.088	/
	Front side	512	0.969	0.94	27	26.53	1.080	2	
		Front side	661	0.913	3.59	27	26.38	1.053	/
		Front side	810	0.827	3.92	27	26.36	0.958	/
GSM1900	GPRS Data-4 Slot	Back side	512	0.273	3.58	27	26.53	0.304	/
	Data Polot	Left side	512	0.074	3.62	27	26.53	0.082	/
		Right side	512	0.197	-3.82	27	26.53	0.220	/
		Bottom side	512	0.041	-2.97	27	26.53	0.046	/
		Front side	9262	0.764	3.22	22	21.59	0.840	/
		Front side	9400	1.122	0.10	22	21.81	1.172	/
		Front side	9538	1.193	-2.98	22	21.90	1.221	3
WCDMA II	RMC	Back side	9538	0.296	-1.85	22	21.90	0.303	/
		Leftside	9538	0.102	-0.58	22	21.90	0.104	/
		Right side	9538	0.411	-1.23	22	21.90	0.421	/
		Bottom side	9538	0.081	-0.48	22	21.90	0.083	/
		Front side	4183	0.542	-1.80	23	22.59	0.596	4
		Back side	4183	0.193	-3.52	23	22.59	0.212	/
WCDMA V	RMC	Leftside	4183	0.072	3.87	23	22.59	0.079	/
•		Right side	4183	0.121	3.26	23	22.59	0.133	/
		Bottom side	4183	0.050	3.68	23	22.59	0.055	/

#### Note:

- 1. The test separation of all above table is 5mm.
- 2. Per KDB 447498 D01, the reported SAR is the measured SAR value adjusted for maximumtune-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. 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.



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#### **Repeated SAR**

Band	BW (MHz)	Test Position	Ch.	Result 1g (W/Kg)	Power Drift(%)	Max.Turn-up Power(dBm)	Meas.Output Power(dBm)	Scaled SAR (W/Kg)	Meas. No.
GSM 850	GPRS Data-4 Slot	Front side	251	1.276	1.51	30	29.88	1.312	/
GSM1900	GPRS Data-4 Slot	Front side	512	0.952	2.63	27	26.53	1.061	/
WCDMA II	RMC	Front side	9538	1.179	3.97	22	21.90	1.206	/

#### 12.2 repeated SAR measurement

Band	BW (MHz)	Test Positior	Ch.	Original Measured SAR 1g(mW/g)	1st Repeated SAR 1g	Ratio	Original Measured SAR 1g(mW/g)	2nd Repeated SAR 1g	Ratio
GSM 850	GPRS Data-4 Slot	Front side	251	1.285	1.276	1.01	-	-	-
GSM1900	GPRS Data-4 Slot	Front side	512	0.969	0.952	1.02	-	-	-
WCDMA II	RMC	Front side	9538	1.193	1.179	1.01	-	-	-

Note:

- 1. Per KDB 865664 D01,for each frequency band ,repeated SAR measurement is required only when the measured SAR is≥0.8W/Kg.
- 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.
- 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. For simultaneous transmission at head and body exposure position, 2transmitters simultaneoustransmission was the worst state.

- 2. Based upon KDB 447498 D01, BT SAR is excluded as below table.
- 3. If the test separation distance is <5mm, 5mm is used for excluded SAR calculation.
- 4. 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
- 5. The reported SAR summation is calculated based on the same configuration and test position.

6. KDB 447498 / 4.3.2 (2) when standalone SAR test exclusion applies to an antenna that transmitssimultaneously with other antennas, the standalone SAR must be estimated according to following todetermine simultaneous transmission SAR test exclusion:

a) (max. power of channel, including tune-up tolerance, mW)/(min. test

separation distance, mm)]  $\left[\sqrt{f} (GHz) / x\right] W/kg$  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.

Estimat	ed SAR	Maximu dBm	ım Power mW	Antenna to user(mm)	Frequency(GHz)	Stand alone SAR(1g) [W/kg]
BT	Body	-4.8	0.331	5	2.480	0.014



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Simultaneous Mode	Position	Mode	Max. 1-g SAR (W/kg)	1-g Sum SAR (W/kg)	
COM - Divetesth		GSM Data	1.321	1 225	
GSM + Bluetooth	Body	Bluetooth	0.014	1.335	
WCDMA + Bluetooth	Pody	WCDMARMC	1.221	1.235	
	Body	Bluetooth	0.014	1.235	

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposurecondition 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 exposurecondition combination is within the SAR limit (SAR-1g 1.6 W/kg), the simultaneoustransmission 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.



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# 13. Equipment List

Kind of Equipment	Manufacturer	Type No.	Serial No.	Last Calibration	Calibrated Until
835MHz Dipole	MVG	SID835	SN 30/14	2017.08.15	2020.08.14
1900MHz Dipole	MVG	SID1900	DIP0G835-332 SN 30/14 DIP1G900-333	2017.08.15	2020.08.14
E-Field Probe	MVG	SSE5	SN 14/16EP309	2019.12.02	2020.12.01
Dielectric Probe Kit	MVG	SCLMP	SN 32/14 OCPG67	2019.11.25	2020.11.24
Antenna	MVG	ANTA3	SN 07/13 ZNTA52	N/A	N/A
Phantom1	MVG	SAM	SN 32/14 SAM115	N/A	N/A
Phantom2	MVG	SAM	SN 32/14 SAM116	N/A	N/A
Phone holder	MVG	N/A	SN 32/14 MSH97	N/A	N/A
Laptop holder	MVG	N/A	SN 32/14 LSH29	N/A	N/A
Attenuator	Agilent	99899	DC-18GHz	N/A	N/A
Directional coupler	Narda	4226-20	3305	N/A	N/A
Network Analyzer	Agilent	8753ES	US38432810	2019.10.11	2020.10.10
Multi Meter	Keithley	Multi Meter 2000	4050073	2019.10.11	2020.10.10
Signal Generator	Agilent	N5182A	MY50140530	2019.10.09	2020.10.08
Wireless Communication Test Set	Agilent	8960-E5515C	MY48360751	2019.10.09	2020.10.08
Wireless Communication Test Set	R&S	CMW500	117239	2019.10.09	2020.10.08
Power Amplifier	DESAY	ZHL-42W	9638	2019.10.09	2020.10.08
Power Meter	R&S	NRP	100510	2019.10.16	2020.10.15
Power Meter	Agilent	E4419B	QB43312265	2019.10.12	2020.10.11
Power Sensor	R&S	NRP-Z11	101919	2019.10.12	2020.10.11
Power Sensor	HP	E9300A	US39210170	2019.10.09	2020.10.08
Temperature hygrometer	SuWei	SW-108	N/A	2019.10.13	2020.10.12
Thermograph	Elitech	RC-4	S/N EF7176501537	2019.10.11	2020.10.10

Note:

Per KDB 865664 D01, Dipole SAR Validation Verification, STS LAB has adopted 3 years calibration intervals. On annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

1. There is no physical damage on the dipole

2. System validation with specific dipole is within 10% of calibrated value

Return-loss in within 20% of calibrated measurement

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# **Appendix A. System Validation Plots**

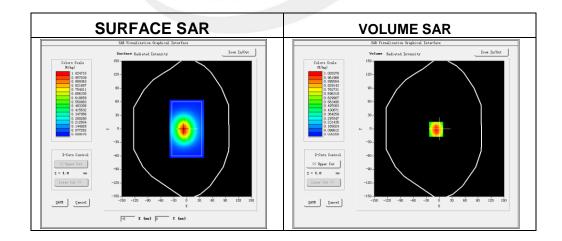
### System Performance Check Data(835MHz)

Type: Phone measurement (Complete)

Area scan resolution: dx=8mm,dy=8mm Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm Date of measurement: 2020-06-01 Measurement duration: 13 minutes 27 seconds

#### **Experimental conditions**

Phantom	Validation plane		
Device Position	-		
Band	835MHz		
Channels			
Signal	CW		
Frequency (MHz)	835MHz		
Relative permittivity	42.05		
Conductivity (S/m)	0.93		
Power drift (%)	-0.14		
Probe	SN 14/16 EP309		
ConvF:	5.74		
Crest factor:	1:1		



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

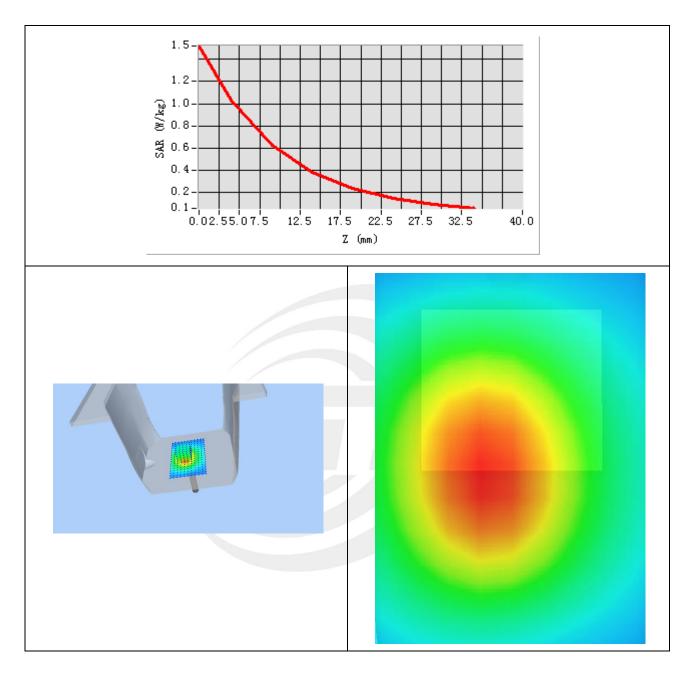
SAR 10g (W/Kg)	0.641078
SAR 1g (W/Kg)	0.940214



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Z Axis Scan



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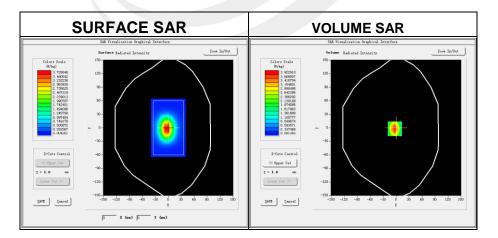


### System Performance Check Data(1900MHz)

Type: Phone measurement (Complete) Area scan resolution: dx=8mm,dy=8mm Zoom scan resolution: dx=8mm, dy=8mm, dz=5mm Date of measurement: 2020-06-02 Measurement duration: 14 minutes 12 seconds

#### Experimental conditions.

Phantom	Validation plane	
Device Position	-	
Band	1900MHz	
Channels	-	
Signal	CW	
Frequency (MHz)	1900MHz	
Relative permittivity	38.34	
Conductivity (S/m)	1.35	
Power drift (%)	1.18	
Probe	SN 14/16 EP309	
ConvF:	5.46	
Crest factor:	1:1	



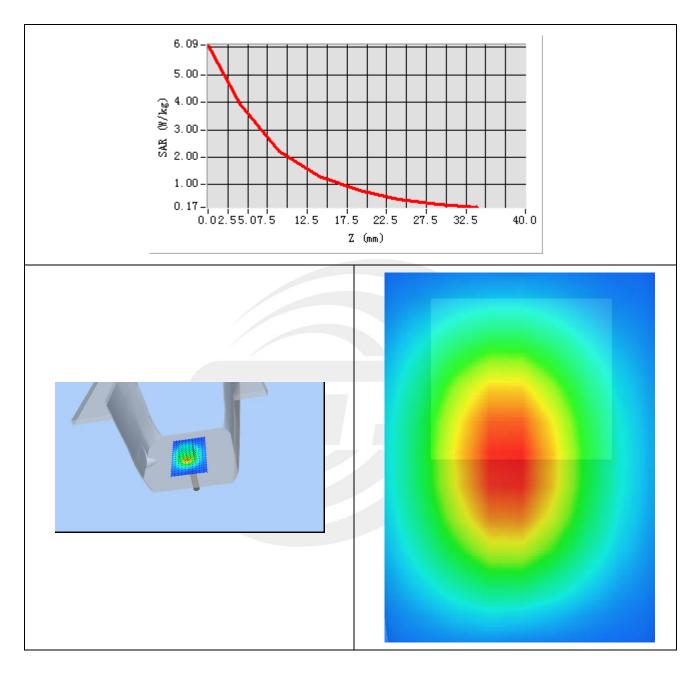
#### Maximum location: X=-3.00, Y=-2.00

SAR 10g (W/Kg)	2.177015
SAR 1g (W/Kg)	3.925801



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Z Axis Scan

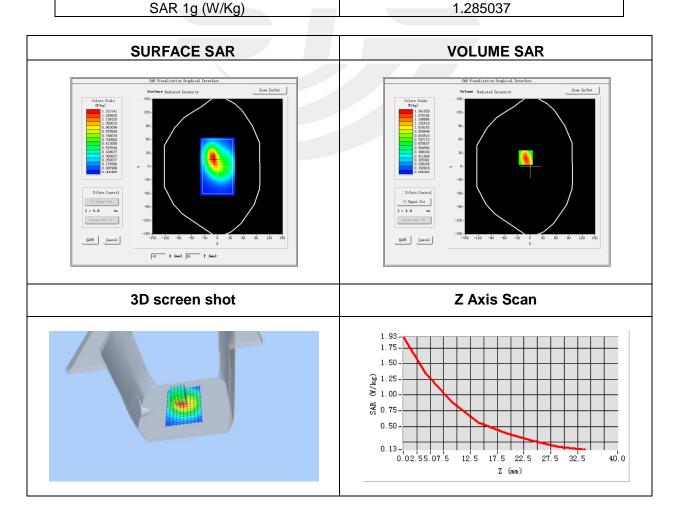


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# Appendix B. SAR Test Plots Plot 1: DUT: GPS Tracker; EUT Model: TRKM110

· ·		
Test Date	2020-06-01	
Probe	SN 14/16 EP309	
ConvF	5.74	
Area Scan	dx=8mm dy=8mm, h= 5.00 mm	
Zoom Scan	5x5x7,dx=8mm dy=8mm dz=5mm,Complete/ndx=8mm dy=8mm, h= 5.00 mm	
Phantom	Validation plane	
Device Position	Bodyfront side	
Band	GPRS 850	
Channels	High	
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)	
Frequency (MHz)	848.8	
Relative permittivity (real part)	41.50	
Conductivity (S/m)	0.90	
	X=-10.00, Y=20.00 : 1.95W/kg	
SAR 10g (W/Kg)	0.781453	



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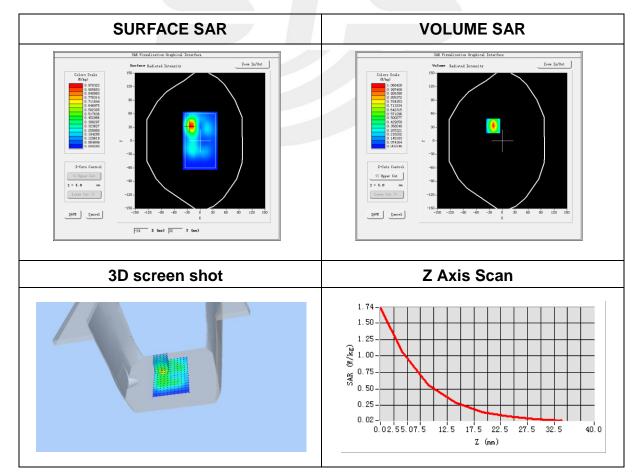
Report No.: STS2005254H01

#### Plot 2: DUT: GPS Tracker; EUT Model: TRKM110

Test Date	2020-06-02		
Probe	SN 14/16 EP309		
ConvF	5.46		
Area Scan	dx=8mm dy=8mm, h= 5.00 mm		
Zoom Scan	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	Low		
Signal	Duty Cycle: 2.00 (Crest factor: 2.0)		
Frequency (MHz)	1850.2		
Relative permittivity (real part)	40.00		
Conductivity (S/m)	1.40		
Maximum location:	Maximum location:X=-21.00, Y=33.00		

# SAR Peak:1.78W/kg

SAR 10g (W/Kg)	0.438084
SAR 1g (W/Kg)	0.968879



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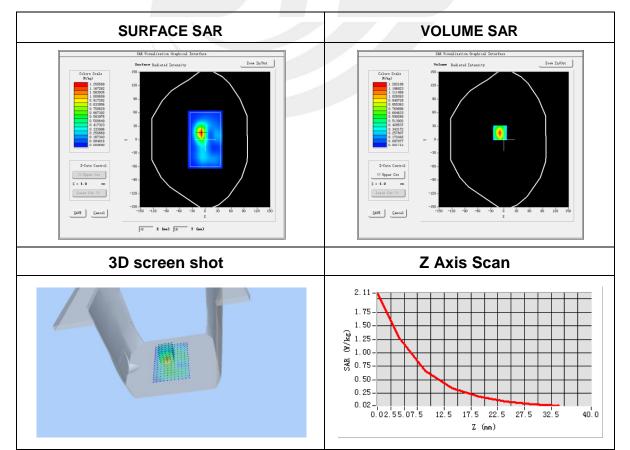
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### Plot 3: DUT: GPS Tracker; EUT Model: TRKM110

,		
Test Date	2020-06-02	
Probe	SN 14/16 EP309	
ConvF	5.46	
Area Scan	dx=8mm dy=8mm, h= 5.00 mm	
	5x5x7,dx=8mm dy=8mm	
Zoom Scan	dz=5mm,Complete/ndx=8mm dy=8mm, h=	
	5.00 mm	
Phantom	Validation plane	
Device Position	Bodyfront side	
Band	WCDMA II	
Channels	High	
Signal	WCDMA (Crest factor: 1.0)	
Frequency (MHz)	1907.6	
Relative permittivity (real part)	40.00	
Conductivity (S/m)	1.40	
Maximum location: X=-9.00, Y=15.00		
SAR Peak: 2.09W/kg		
SAR 10g (W/Kg)	0.541190	

SAR 10g (W/Kg)	0.541190
SAR 1g (W/Kg)	1.193415



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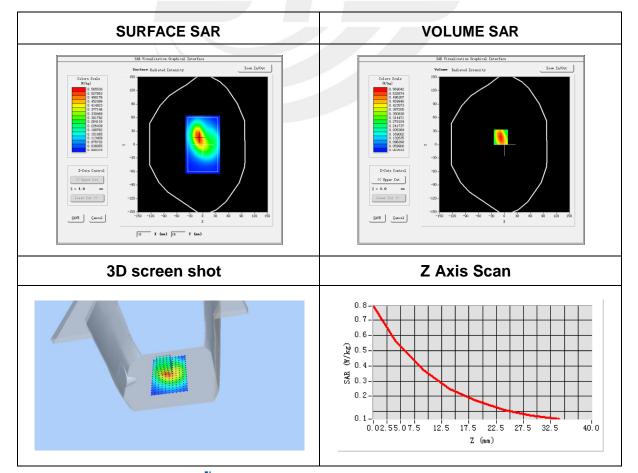


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### Plot 4: DUT: GPS Tracker; EUT Model: TRKM110

,		
Test Date	2020-06-01	
Probe	SN 14/16 EP309	
ConvF	5.74	
Area Scan	dx=8mm dy=8mm, h= 5.00 mm	
Zoom Scan	5x5x7,dx=8mm dy=8mm	
	dz=5mm,Complete/ndx=8mm dy=8mm, h=	
	5.00 mm	
Phantom	Validation plane	
Device Position	Bodyfront side	
Band	WCDMA V	
Channels	Middle	
Signal	WCDMA (Crest factor: 1.0)	
Frequency (MHz)	836.6	
Relative permittivity (real part)	41.50	
Conductivity (S/m)	0.90	
Maximum location: X=-9.00, Y=17.00		
SAR Peak: 0.79W/kg		
SAR 10g (W/Kg)	0.333853	

SAR 10g (W/Kg)	0.333853
SAR 1g (W/Kg)	0.542360



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# Appendix C. Probe Calibration And Dipole Calibration Report

Refer the appendix Calibration Report.





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