# **FCC SAR Test Report**

APPLICANT	: Scituate L.L.C.
EQUIPMENT	: Wireless Device
MODEL NAME	: JK76PL
FCC ID	: 2ACBE-0610
STANDARD	: FCC 47 CFR Part 2 (2.1093) ANSI/IEEE C95.1-1992 IEEE 1528-2003

We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the procedures and had been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC., the test report shall not be reproduced except in full.

Cole huang

Reviewed by: Eric Huang / Deputy Manager

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#### SPORTON INTERNATIONAL INC.

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# **Revision History**

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA4N2858	Rev. 01	Initial issue of report	Dec. 15, 2014
FA4N2858	Rev. 02	<ol> <li>Added SAR tests exclusion in section12, and note3 in section13.</li> </ol>	Dec. 24, 2014

# 1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Scituate L.L.C., Wireless Device, JK76PL** are as follows.

Equipment Frequency Class Band		Highest SAR Summary Extremity (Separation 0mm) 10g SAR (W/kg)	
DTS	1.80		
Date of	12/04/2014		

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2003.

# 2. Administration Data

Test Site       SPORTON INTERNATIONAL INC.         Test Site Location       No. 52, Hwa Ya 1 <sup>st</sup> Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C.         TEL: +886-3-327-3456       FAX: +886-3-328-4978	Testing Laboratory			
Test Site Location         Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C.           TEL: +886-3-327-3456	Test Site SPORTON INTERNATIONAL INC.			
	Test Site Location	Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C. TEL: +886-3-327-3456		

Applicant		
Company Name Scituate L.L.C.		
Address	3100 West Ray Road Suite 201 Chandler, Arizona 85226	

# 3. <u>Guidance Standard</u>

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2003
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r03
- FCC KDB 865664 D02 SAR Reporting v01r01
- FCC KDB 447498 D01 General RF Exposure Guidance v05r02
- FCC KDB 248227 D01 SAR meas for 802 11abg v01r02

# 4. Equipment Under Test (EUT)

### 4.1 General Information

Product Feature & Specification		
Equipment Name	Wireless Device	
Model Name	JK76PL	
FCC ID	2ACBE-0610	
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz	
Mode	• 802.11b/g/n HT20	
EUT Stage	Production Unit	

# 4.2 <u>Maximum Tune-up Limit</u>

Mode / channel	Average Power (dBm)				
	1	2	6	10	11
802.11b	19.5	-	19.5	-	19.5
802.11g	12.5	14.5	17.0	17.0	14.0
802.11n-HT20	12.0	14.5	17.0	17.0	13.0

# 5. <u>RF Exposure Limits</u>

### 5.1 Uncontrolled Environment

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

### 5.2 Controlled Environment

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

#### Limits for Occupational/Controlled Exposure (W/kg)

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

#### Limits for General Population/Uncontrolled Exposure (W/kg)

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

1. 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.

# 6. Specific Absorption Rate (SAR)

#### 6.1 Introduction

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.

#### 6.2 SAR Definition

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:

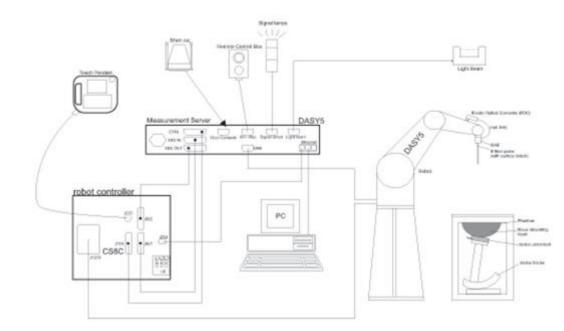
$$SAR = \frac{d}{dt} \left( \frac{dW}{dm} \right) = \frac{d}{dt} \left( \frac{dW}{\rho dv} \right)$$

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

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  is the mass density of the tissue and E is the RMS electrical field strength.

# 7. System Description and Setup



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

- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

### 8. Measurement Procedures

The measurement procedures are as follows:

#### <Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

#### 8.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values form the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

#### 8.2 Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

### 8.3 <u>Area Scan</u>

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0 is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

	$\leq$ 3 GHz	> 3 GHz	
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	$5 \pm 1 \text{ mm}$ $\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$		
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^{\circ} \pm 1^{\circ}$	$20^{\circ} \pm 1^{\circ}$	
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.		

### 8.4 <u>Zoom Scan</u>

Zoom scans are used assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube shoes base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the zoom scan evaluates the averaged SAR for 1 gram and 10 gram and displays these values next to the job's label.

			$\leq$ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$		$\leq 2$ GHz: $\leq 8$ mm 2 - 3 GHz: $\leq 5$ mm <sup>*</sup>	$3 - 4 \text{ GHz:} \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz:} \le 4 \text{ mm}^*$	
uniform grid: $\Delta z_{Zoom}(n)$ Maximum zoom scan spatial resolution, normal to phantom surface       graded $\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface		$\leq$ 5 mm	$3 - 4$ GHz: $\leq 4$ mm $4 - 5$ GHz: $\leq 3$ mm $5 - 6$ GHz: $\leq 2$ mm	
		1 <sup>st</sup> two points closest	$\leq$ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
g	grid $\Delta z_{Zoom}(n>1)$ : between subsequent points		≤1.5·∆z	<sub>Zoom</sub> (n-1)
Minimum zoom scan volume	an x, y, z		$\geq$ 30 mm	$3 - 4 \text{ GHz}: \ge 28 \text{ mm}$ $4 - 5 \text{ GHz}: \ge 25 \text{ mm}$ $5 - 6 \text{ GHz}: \ge 22 \text{ mm}$

Zoom scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

When zoom scan is required and the <u>reported</u> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is  $\leq$  1.4 W/kg,  $\leq$  8 mm,  $\leq$  7 mm and  $\leq$  5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

#### 8.5 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

### 8.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.

# 9. <u>Test Equipment List</u>

Manufacturer		Turne/Medal	Serial Number	Calib	ration
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	869	Jun. 13, 2014	Jun. 12, 2015
SPEAG	Data Acquisition Electronics	DAE3	577	Oct. 06, 2014	Oct. 05, 2015
SPEAG	Dosimetric E-Field Probe	EX3DV4	3931	Sep. 25, 2014	Sep. 24, 2015
Wisewind	Thermometer	ETP-101	TM560	Oct. 21, 2014	Oct. 20, 2015
SPEAG	Device Holder	N/A	N/A	NCR	NCR
R&S	Signal Generator	SMU200A	102502	Jul. 07, 2014	Jul. 06, 2015
SPEAG	Dielectric Probe Kit	DAKS-3.5	0004	Mar. 04, 2014	Mar. 03, 2015
Agilent	ENA Network Analyzer	E5071C	MY46101588	May. 31, 2014	May. 30, 2015
Anritsu	Power Meter	ML2495A	1036004	Aug. 09, 2014	Aug. 08, 2015
Anritsu	Power Sensor	MA2411B	1027253	Aug. 11, 2014	Aug. 10, 2015
R&S	Spectrum Analyzer	FSP 30	101329	Jun. 14, 2014	Jun. 13, 2015
Agilent	Dual Directional Coupler	778D	50422	No	te1
Woken	Attenuator 1	WK0602-XX	N/A	No	te1
PE	Attenuator 2	PE7005-10	N/A	No	te1
PE	Attenuator 3	PE7005-3	N/A	No	te1
AR	Power Amplifier	5S1G4M2	0328767	No	te1
Mini-Circuits	Power Amplifier	ZVE-3W	162601250	Note1	
Mini-Circuits	Power Amplifier	ZHL-42W+	13440021344	No	te1

General Note:

1. Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.

# 10. System Verification

### 10.1 Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (εr)			
	For Head										
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9			
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5			
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5			
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0			
2450	55.0	0	0	0	0	45.0	1.80	39.2			
2600	54.8	0	0	0.1	0	45.1	1.96	39.0			
				For Body							
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5			
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2			
900	50.8	48.2	0	0.9	0.1	0	1.05	55.0			
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3			
2450	68.6	0	0	0	0	31.4	1.95	52.7			
2600	68.1	0	0	0.1	0	31.8	2.16	52.5			

#### Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

#### <Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Permittivity (ε <sub>r</sub> )	Conductivity Target (σ)	Permittivity Target (ε <sub>r</sub> )	Delta (σ) (%)	Delta (ε <sub>r</sub> ) (%)	Limit (%)	Date
2450	MSL	22.6	1.904	51.836	1.95	52.70	-2.36	-1.64	±5	2014/12/4

### 10.2 System Performance Check Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2014/12/4	2450	MSL	250	D2450V2-869	EX3DV4 - SN3931	DAE3 Sn577	6.02	23.60	24.08	2.03

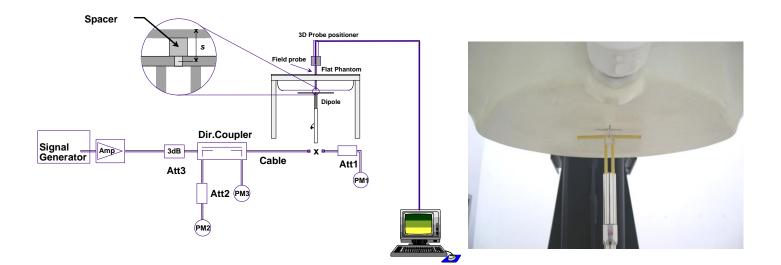


Fig 8.3.1 System Performance Check Setup

Fig 8.3.2 Setup Photo

# 11. Conducted RF Output Power (Unit: dBm)

#### <WLAN Conducted Power>

#### **General Note:**

1. For 2.4GHz WLAN SAR testing, highest average RF output power channel for the lowest data rate for 802.11b were selected for SAR evaluation. 802.11g/n HT20 were not investigated since the average output powers over all channels and data rates were not more than 0.25 dB higher than the tested channel in the lowest data rate of 802.11b mode.

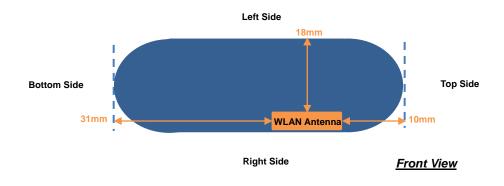
#### <2.4GHz WLAN>

WLAN 2.4GHz 802.11b Average Power (dBm)								
Power vs. Channel								
Channel	Frequency	Data Rate						
Channel	(MHz)	1Mbps						
CH 1	2412	19.14						
CH 6	2437	18.40						
CH 11	CH 11 2462 17.67							

WLAN 2.4GHz 802.11g Average Power (dBm) Power vs. Channel								
Channel Frequency Data Rate (MHz) 6Mbps								
CH 1	2412	12.03						
CH 6	2437	16.75						
CH 11	2462	13.86						

WLAN 2.4GHz 802.11n-HT20 Average Power (dBm) Power vs. Channel								
Channel Frequency MCS Index (MHz) MCS0								
CH 1	2412	11.94						
CH 6	2437	16.63						
CH 11	2462	12.71						

# 12. Antenna Location



### <SAR test exclusion table>

#### General Note:

- Maximum power is the source-based time-average power and represents the maximum RF output power among production units
   Per KDB 447498 D01v05r02, for larger devices, the separation distance of adjacent edge configuration is determined by the closest
- Per KDB 447498 D01v05r02, standalone SAR test exclusion threshold is applied; If the separation distance is < 5mm, 5mm is used</li>
- to determine SAR exclusion threshold. 4. Per KDB 447498 D01v05r02, the 1-g 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. separation distance, mm)]  $\left[\sqrt{f(GHz)}\right] \le 3.0$  for 1-g SAR and  $\le 7.5$  for 10-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

	Wireless Interface	802.11b
Exposure Position	Calculated Frequency	2462MHz
	Maximum power (dBm)	19.5
	Maximum rated power(mW)	89.0
	Separation distance(mm)	5.0
Front	exclusion threshold	28.0
	Testing required?	Yes
	Separation distance(mm)	5.0
Back	exclusion threshold	28.0
	Testing required?	Yes
	Separation distance(mm)	18.0
Left Side	exclusion threshold	8.0
	Testing required?	Yes
	Separation distance(mm)	5.0
Right Side	exclusion threshold	28.0
	Testing required?	Yes
	Separation distance(mm)	31.0
Bottom Side	exclusion threshold	5.0
	Testing required?	No
	Separation distance(mm)	10.0
Top Side	exclusion threshold	14.0
	Testing required?	Yes

# 13. <u>SAR Test Results</u>

#### **General Note:**

- 1. Per KDB 447498 D01v05r02, 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 WLAN: Reported SAR(W/kg)= Measured SAR(W/kg)\* Duty Cycle scaling factor \* Tune-up scaling factor
- 2. Per KDB 447498 D01v05r02, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
  - $\leq$  0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq$  100 MHz
  - · ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
  - ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
- 3. Since bottom side of the EUT connects wires to DC power supply, therefore this position can't be direct contacted the phantom, and antenna to bottom side distance is >2.5cm that it is compliance SAR exemption thresholds.
- 4. During SAR testing the WLAN transmission was verified using a spectrum analyzer.

### 13.1 Extremity SAR

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 10g SAR (W/kg)	Reported 10g SAR (W/kg)
	WLAN2.4GHz	802.11b 1Mbps	Front	0cm	1	2412	19.14	19.50	1.086	-0.13	0.912	0.991
01	WLAN2.4GHz	802.11b 1Mbps	Back	0cm	1	2412	19.14	19.50	1.086	0.07	1.660	<mark>1.803</mark>
	WLAN2.4GHz	802.11b 1Mbps	Left Side	0cm	1	2412	19.14	19.50	1.086	-0.07	0.389	0.423
	WLAN2.4GHz	802.11b 1Mbps	Right Side	0cm	1	2412	19.14	19.50	1.086	-0.14	0.826	0.897
	WLAN2.4GHz	802.11b 1Mbps	Top Side	0cm	1	2412	19.14	19.50	1.086	-0.16	0.310	0.337

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### 14. Uncertainty Assessment

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type An evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor <sup>(a)</sup>	1/k <sup>(b)</sup>	1/√3	1/√6	1/√2

- (a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity
- (b)  $\kappa$  is the coverage factor

#### Table 14.1. Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.

Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)
Measurement System						•	•
Probe Calibration	6.0	Normal	1	1	1	± 6.0 %	± 6.0 %
Axial Isotropy	4.7	Rectangular	√3	0.7	0.7	± 1.9 %	± 1.9 %
Hemispherical Isotropy	9.6	Rectangular	√3	0.7	0.7	± 3.9 %	± 3.9 %
Boundary Effects	1.0	Rectangular	√3	1	1	± 0.6 %	± 0.6 %
Linearity	4.7	Rectangular	√3	1	1	± 2.7 %	± 2.7 %
System Detection Limits	1.0	Rectangular	√3	1	1	± 0.6 %	± 0.6 %
Readout Electronics	0.3	Normal	1	1	1	± 0.3 %	± 0.3 %
Response Time	0.8	Rectangular	√3	1	1	± 0.5 %	± 0.5 %
Integration Time	2.6	Rectangular	√3	1	1	± 1.5 %	± 1.5 %
RF Ambient Noise	3.0	Rectangular	√3	1	1	± 1.7 %	± 1.7 %
RF Ambient Reflections	3.0	Rectangular	√3	1	1	± 1.7 %	± 1.7 %
Probe Positioner	0.4	Rectangular	√3	1	1	± 0.2 %	± 0.2 %
Probe Positioning	2.9	Rectangular	√3	1	1	± 1.7 %	± 1.7 %
Max. SAR Eval.	1.0	Rectangular	√3	1	1	± 0.6 %	± 0.6 %
Test Sample Related							
Device Positioning	2.9	Normal	1	1	1	± 2.9 %	± 2.9 %
Device Holder	3.6	Normal	1	1	1	± 3.6 %	± 3.6 %
Power Drift	5.0	Rectangular	√3	1	1	± 2.9 %	± 2.9 %
Phantom and Setup							
Phantom Uncertainty	4.0	Rectangular	√3	1	1	± 2.3 %	± 2.3 %
Liquid Conductivity (Target)	5.0	Rectangular	√3	0.64	0.43	± 1.8 %	± 1.2 %
Liquid Conductivity (Meas.)	2.5	Normal	1	0.64	0.43	± 1.6 %	± 1.1 %
Liquid Permittivity (Target)	5.0	Rectangular	√3	0.6	0.49	± 1.7 %	± 1.4 %
Liquid Permittivity (Meas.)	2.5	Normal	1	0.6	0.49	± 1.5 %	± 1.2 %
Combined Standard Uncertaint	V				•	± 11.0 %	± 10.8 %
Coverage Factor for 95 %						K	=2
Expanded Uncertainty						± 22.0 %	± 21.5 %

Table 14.2. Uncertainty Budget for frequency range 300 MHz to 3 GHz

### 15. <u>References</u>

- [1] FCC 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", September 1992
- [3] IEEE Std. 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v01r02, "SAR Measurement Procedures for 802.11 a/b/g Transmitters", May 2007
- [6] FCC KDB 447498 D01 v05r02, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Feb 2014
- [7] FCC KDB 865664 D01 v01r03, "SAR Measurement Requirements for 100 MHz to 6 GHz", Feb 2014.
- [8] FCC KDB 865664 D02 v01r01, "RF Exposure Compliance Reporting and Documentation Considerations" May 2013.