

FCC SAR REPORT

Authorized Signature:

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2 Version

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4 General Information

4.1 Client Information

4.2 General Description of EUT

4.3 Environment of Test Site

4.4 Test Location

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5 Introduction

5.1 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 generalpopulation/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. Ingeneral, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

5.2 SAR Definition

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

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

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

$$
SAR = C\left(\frac{\partial T}{\partial t}\right)
$$

Where: C is the specific heat capacity, δT is the temperature rise and δt is the exposure duration, or related to theelectrical field in the tissue by

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

6 RF Exposure Limits

6.1 Uncontrolled Environment

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

6.2 Controlled Environment

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

6.3 RF Exposure Limits

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

Note:

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

7 SAR Measurement System

Fig.8.1 SPEAG DASY System Configurations

The DASY system for performance compliance tests is illustrated above graphically. This system consists of thefollowing items:

- \triangleright A standard high precision 6-axis robot with controller, a teach pendant and software
- \triangleright A data acquisition electronic (DAE) attached to the robot arm extension
- \triangleright A dosimetric probe equipped with an optical surface detector system
- \triangleright The electro-optical converter (EOC) performs the conversion between optical and electrical signals
- \triangleright A measurement server performs the time critical tasks such as signal filtering, control of the robot operationand fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning

A computer operating Windows XP
- A computer operating Windows XP
- > DASY software
- \triangleright Remove control with teach pendant and additional circuitry for robot safety such as warming lamps, etc.
- \triangleright The SAM twin phantom
- \triangleright A device holder
- \triangleright Tissue simulating liquid
- \triangleright Dipole for evaluating the proper functioning of the system

Component details are described in the following sub-sections.

7.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

E-Field Probe Specification

E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than \pm 10%. The spherical isotropy shall be evaluated and within \pm 0.25 dB. The sensitivity parameters (Norm X, Norm Y and Norm Z), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data can be referred to appendix E of this report.

7.2 Data Acquisition Electronics (DAE)

The Data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gainswitching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

Fig. 8.3 Photo of DAE

7.3 Robot

The SPEAG DASY system uses the high precision robots (DASY5: TX60XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY5: CS8c) from Stäubliis used. The Stäublirobot series have many features that are important for our application:

- High precision (repeatability 0.02 mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; nobelt drives)
- Jerk-free straight movements
- Low ELF interference (motor control fields shielded via the closed metallic constructionshields)

Fig. 8.4 Photo of Robot

7.4 Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY 5: 400MHz, Intel Celeron), chipdisk (DASY5: 128 MB), RAM (DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.

Fig. 8.5 Photo of Server for DASY5

7.5 Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actualposition of the probe tip with respect to the robot arm is measured, as well as the probe lengthand the horizontal probe offset. The software then corrects all movements, such that the robotcoordinates are valid for the probe tip.

The repeatability of this process is better than0.1 mm. If a position has been taught with analigned probe, the same position will be reachedwith another aligned probe within 0.1 mm, even ifthe other probe has different dimensions. Duringprobe rotations, the probe tip will keep its actualposition.

Fig. 8.6 Photo of Light Beam

7.6 Phantom

<SAM Twin Phantom>

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI4 Phantom>

The ELI4 phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30MHz to 6 GHz. ELI4 is fully compatible with the latest draft of the standard IEC 62209-2 and all known tissue simulating liquids.

ELI4 has been optimized regarding its performance and can be integrated into a SPEAG standardphantom table. A cover prevents evaporation of the liquid. Reference markings on the phantom allowinstallation of the complete setup, including all predefined phantom positions and measurementgrids, by teaching three points The phantom can be used with the following tissue simulating liquids:

- Water-sugar based liquids can be left permanently in the phantom. Always cover the liquid if the system is not in use; otherwise the parameters will change due to water evaporation.
- DGBE based liquids should be used with care. As DGBE is a softener for most plastics, the liquid should be taken out of the phantom and the phantom should be dried when the system is not in use (desirable at least once a week).
- Do not use other organic solvents without previously testing the phantom resistiveness.

Fig.8.8 Photo of ELI4 Phantom

7.7 Device Holder

<Device Holder for SAM Twin Phantom>

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. The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-low POM material having the following dielectric parameters: relative permittivity $ε = 3$ and loss tangent $δ = 0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

Fig. 8.9Photo of Device Holder

7.8 Data storage and Evaluation

Data Storage

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

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

Data Evaluation

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

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

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

The formula for each channel can be given as:

$$
V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}
$$

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

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

cf = crest factor of exciting field (DASY parameter)

dcpⁱ = diode compression point (DASY parameter)

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

E- Field Probes:
$$
E_i = \sqrt{\frac{v_i}{Norm_iConvF}}
$$

H-Field Probes: $H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$

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

Norm_i= senor sensitivity of channel i, $(i = x, y, z)$, $\mu V / (V/m)^2$

ConvF = sensitivity enhancement in solution

 a_{ii} = sensor sensitivity factors for H-field probes

 $f =$ carrier frequency (GHz)

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

 $Hi = magnetic field strength of channel i in A/m$

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

$$
E_{\text{tot}} = \sqrt{E_x^2 + E_y^2 + E_z^2}
$$

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

$$
\mathsf{SAR} = E_{\text{tot}}^2 \cdot \frac{\sigma}{\rho \cdot 1000}
$$

With SAR = local specific absorption rate in mW/g E_{tot} = total field strength in V/m

σ = conductivity in (mho/m) or (Siemens/m)

 $p=$ equipment tissue density in g/cm³

Note that the density is set to 1, to account for actual head tissue density rather than the density of the tissue simulating liquid.

7.9 Test Equipment List

Note:

- 1. The calibration certificate of DASY can be referred to appendix C of this report.
- 2. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. Thedipoles are also not physically damaged, or repaired during the interval.
- 3. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via the networkanalyzer and compensated during system check.
- 4. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in purewater) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure andcalibration kit are provided by Speag.
- 5. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to haveprecise power level to the dipole; the measured SAR will be normalized to 1W input power according to the ratio of1W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not criticallyrequired for correct measurement; the power meter is critical and we do have calibration for it

6. Attenuator insertion loss is calibrated by the network Analyzer, which the calibration is valid, before systemcheck.

7. N.C.R means No Calibration Requirement.

8 Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 9.1, for body SAR testing, the liquid height from the center of the flat phantom to liquid top surface is larger than 15 cm, which is shown in Fig. 9.2.

Fig. 9.2 Photo of Liquid Height for Body SAR of (700MHz~1000MHz) (depth>15cm)

The relative permittivity and conductivity of the tissue material should be within±5% of the values given in the table below recommended by the FCC OET 65supplement C and RSS 102 Issue 5.

(ϵ r = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

The dielectric parameters of liquids were verified prior to the SAR evaluation using a SpeagDielectric Probe Kit and an Agilent Network Analyzer.

The following table shows the measuring results for simulating liquid.

9 SAR System Verification

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder.

Purpose of System Performance check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

Fig.10.1 System Verification Setup Diagram

Fig.10.2 Photo of Dipole setup

System Verification Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10%. The table as below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix C of this report.

10 EUT Testing Position

This EUT was tested in two different positions. They are Front/Back Side of the EUT with phantom 0 mm gap, as illustrated below, please refer to Appendix B for the test setup photos.

10.1 SAR Evaluations near the Mouth/Jaw Regions of the SAM Phantom

Antennas located near the bottom of a phone may require SAR measurements around the mouth and jawregions of the SAM head phantom. This typically applies to clam-shell style phones that are generallylonger in the unfolded normal use positions or to certain older style long rectangular phones.

Under these circumstances, the following procedures apply, adopted from the FCC guidance on SARhandsets document FCC KDB Publication 648474 D04v01r03. The SAR required in these regions of SAMshould be measured using a flat phantom. The phone should be positioned with a separation distance of4 mm between the ear reference point (ERP) and the outer surface of the flat phantom shell. Whilemaintaining this distance at the ERP location, the low (bottom) edge of the phone should be lowered fromthe phantom to establish the same separation distance between the peak SAR locations identified by thetruncated partial SAR distribution measured with the SAM phantom. The distance from the peak SARlocation to the phone is determined by the straight line passing perpendicularly through the phantomsurface. When it is not feasible to maintain 4 mm separation at the ERP while also establishing therequired separation at the peak SAR location, the top edge of the phone will be allowed to touch thephantom with a separation < 4 mm at the ERP. The phone should not be tilted to the left or right whileplaced in this inclined position to the flat phantom.

10.2 Body Worn Accessory Configurations

- \triangleright To position the device parallel to the phantom surface with either keypad up or down.
- \geq To adjust the device parallel to the flat phantom.
 \geq To adjust the distance between the device surface
- To adjust the distance between the device surface and the flat phantom to 1.5 cm or holster surface and the flat phantom to 0 cm.

Fig.11.5 Illustration for Body Worn Position

10.3 Wireless Router (Hotspot) Configurations

Some battery-operated handsets have the capability to transmit and receive internet connectivity throughsimultaneous transmission of WIFI in conjunction with a separate licensed transmitter. The FCC hasprovided guidance in KDB Publication 941225 D06 where SAR test considerations for handsets (L x W ≥ 9 cm x 5 cm) are based on a composite test separation distance of 10 mm from the front, back and edgesof the device with antennas 2.5 cm or closer to the edge of the device, determined from general mixeduse conditions for this type of devices. Since the hotspot SAR results may overlap with the body-wornaccessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

When the user enables the personal wireless router functions for the handset, actual operations includesimultaneous transmission of both the WIFI transmitter and another licensed transmitter. Bothtransmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated forSAR under actual use conditions. Therefore, SAR must be evaluated for each frequency transmissionand mode separately and summed with the WIFI transmitter according to KDB 648474 publicationprocedures. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SARmeasurements were evaluated for a single transmission frequency RF signal.

Fig.11.6 Illustration for Hotspot Position

11 Measurement Procedures

The measurement procedures are as bellows:

<Conducted power measurement>

- For WWAN power measurement, use base station simulator to configure EUT WWAN transition in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- \triangleright Read the WWAN RF power level from the base station simulator.
- 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.
- Connect EUT RF port through RF cable to the power meter or spectrum analyzer, and measure WLAN/BT output power.

<Conducted power measurement>

- \triangleright 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.
- \triangleright Place the EUT in positions as Appendix B demonstrates.
- \triangleright Set scan area, grid size and other setting on the DASY software.
- \triangleright Measure SAR results for the highest power channel on each testing position.
- \triangleright Find out the largest SAR result on these testing positions of each band.
- > Measure SAR results for other channels in worst SAR testing position if the Reported SAR or 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:

- \triangleright Power reference measurement
- \triangleright Area scan
- \triangleright 700m scan
- \triangleright Power drift measurement

11.1 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 10 g 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 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

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

11.2 Power Reference Measurement

The Power Reference Measurement and Power Drift Measurement 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.

11.3 Area & Zoom Scan Procedures

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 10g. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r04 quoted below.

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.

11.4 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 post-processor scan combine and subsequently superpose these measurement data to calculating the multiband SAR.

11.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1g and 10g cubes, the extrapolation distance should not be larger than 5 mm.

11.6 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.

12 Conducted RF Output Power

Note:

- 1. Per KDB 447498 D01v06, the 1-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*)] ·[√f(GHz)] ≤ 3.0 for 1 g 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

- 2. Base on the result of note1, RF exposure evaluation of 915MHz mode is required.
- 3. Per 2016-10-12-4.3 RF Exposure General Issues 101216 KC, the maximum permissible duty cycle of this device determined by the handset manufacturer is 75%, the actual duty cycle is 61.2%, so the duty cycle factor is 1.23.

13 Exposure Positions Consideration

13.1 EUT Antenna Locations

Antenna of TR2650A

Antenna of TR2652AX

14 SAR Test Results Summary

14.1 Extremity (Hands) SAR

 \geq 10-g extremity SAR

TR2650A:

Note:

- 1. Extremity SAR testing was performed at 0mm separation, and this distance is determined by the handset manufacturer.
- 2. Per KDB 447498 D01v06, for each exposure position, if the highest output channel Reported SAR ≤2.0W/kg, other channels SAR testing is not necessary.
- 3. Per KDB 447498 D01v06, the extremity condition requires 10-g extremity SAR.

14.2 Measurement Uncertainty

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 A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation istermed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by anestimated 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; orcarrying 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 behaviorand properties of relevant materials and instruments, manufacture's specification, data provided in calibration reportsand uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is eitherobtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution,rectangular or triangular distributions indicated in below Table.

Standard Uncertainty for Assumed Distribution

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

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

Uncertainty Budget for frequency range 300 MHz to 3 GHz according to IEEE1528-2013

14.3 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Industry Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested. Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.

15 Reference

- [1]. FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules andRegulations"
- [2]. ANSI/IEEE Std. C95.1-2005, "IEEE Standard for Safety Levels with Respect to Human Exposureto Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3]. IEEE Std. 1528-2013, "Recommended Practice for Determining the Peak Spatial-AverageSpecific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices:Measurement Techniques", September2013
- [4]. SPEAG DASY52 System Handbook
- [5]. FCC KDB 447498 D01 v06, "RF EXPOSURE PROCEDURES AND EQUIPMENT AUTHORIZATION POLICIES FOR MOBILE AND PORTABLE DEVICES", October 2015
- [6]. FCC KDB 648474 D04 v01r03, "SAR EVALUATION CONSIDERATIONS FOR WIRELESS HANDSETS", October 2015
- [7]. FCC KDB 941225 D06 v02r01, "SAR EVALUATION PROCEDURES FOR PORTABLE DEVICES WITH WIRELESS ROUTER CAPABILITIES", October 2015
- [8]. FCC KDB 865664 D01 v01r04, "SAR MEASUREMENT REQUIREMENTS FOR 100 MHz TO 6 GHz", August2015

Appendix A: EUT Photos

TR2650A

TR2652AX

Appendix B: Test Setup Photos

Body

Front side (0mm)

Back side(0mm)

Appendix C: Plots of SAR System Check

Test Laboratory: CCIS Date/Time: 07.03.2017 22:44:29

DUT: Dipole 835 MHz; Type: D835V2; Serial: SN:4d154

Communication System: UID 0, CW (0); Frequency: 835 MHz; Duty Cycle: 1:1 Medium parameters used (interpolated): $f = 835 \text{ MHz}$; $\sigma = 1.001 \text{ S/m}$; $\varepsilon_r = 54.126$; $\rho = 1000$ $kg/m³$ Phantom section: Flat Section Measurement Standard: DASY5 (IEEE/IEC/ANSI C63.19-2007)

DASY Configuration:

- Probe: EX3DV4 SN3924; ConvF(9.79, 9.79, 9.79); Calibrated: 06.27.2017;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1373; Calibrated: 02.09.2017
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1208
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

System Performance Check at Frequency 835 MHz Body Tissue/d=15mm, Pin=80 mW, dist=2.0mm (EX-Probe)/Area Scan (41x131x1): Interpolated grid:

 $dx=1.500$ mm, $dy=1.500$ mm

Maximum value of SAR (interpolated) = 1.01 W/kg

System Performance Check at Frequency 835 MHz Body Tissue/d=15mm, Pin=80 mW, dist=2.0mm (EX-Probe)/Zoom Scan (7x7x7) (5x5x7)/Cube 0:

Measurement grid: dx=8mm, dy=8mm, dz=5mm Reference Value = 33.11 V/m; Power Drift = -0.07 dB Peak SAR (extrapolated) = 1.18 W/kg **SAR(1 g) = 0.802 W/kg; SAR(10 g) = 0.491 W/kg**

Maximum value of SAR (measured) = 1.01 W/kg

Appendix D: Plots of SAR Test Data

Test Laboratory: CCIS Date/Time: 07.03.2017 23:40:32

DUT: CAR ALARM(TWO WAY); Type: TR2650A; Serial: 1#

Communication System: UID 0, LoRa (0);Frequency: 914.8 MHz; Duty Cycle: 1:1 Medium parameters used: f = 915 MHz; σ = 1.024 S/m; ε_r = 53.374; ρ = 1000 kg/m³ Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 SN3924; ConvF(9.7, 9.7, 9.7); Calibrated: 06.27.2017;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1373; Calibrated: 02.09.2017
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1208
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Extremity Front/Middle Channel/Area Scan (31x51x1): Interpolated grid:

 $dx=1.500$ mm, $dy=1.500$ mm Maximum value of SAR (interpolated) = 0.0394 W/kg

Extremity Front/Middle Channel/Zoom Scan (5x5x7)/Cube 0: Measurement grid:

 $dx=8$ mm, $dy=8$ mm, $dz=5$ mm Reference Value = 5.35 V/m; Power Drift = 0.30 dB Peak SAR (extrapolated) = 0.0780 W/kg **SAR(1 g) = 0.015 W/kg; SAR(10 g) = 0.00659 W/kg** Maximum value of SAR (measured) = 0.0432 W/kg

Test Laboratory: CCIS Date/Time: 07.03.2017 23:22:24

DUT: CAR ALARM(TWO WAY); Type: TR2650A; Serial: 1#

Communication System: UID 0, LoRa (0); Frequency: 914.8 MHz; Duty Cycle: 1:1 Medium parameters used: f = 915 MHz; σ = 1.024 S/m; ε_r = 53.374; ρ = 1000 kg/m³ Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 SN3924; ConvF(9.7, 9.7, 9.7); Calibrated: 06.27.2017;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1373; Calibrated: 02.09.2017
- Phantom: ELI v5.0; Type: QDOVA002AA; Serial: TP:1208
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Extremity Back/Middle Channel/Area Scan (31x51x1): Interpolated grid: dx=1.500 mm, dy=1.500 mm

Maximum value of SAR (interpolated) = 0.482 W/kg

Extremity Back/Middle Channel/Zoom Scan (5x5x7)/Cube 0: Measurement grid:

 $dx=8$ mm, $dy=8$ mm, $dz=5$ mm Reference Value = 18.89 V/m; Power Drift = -0.04 dB Peak SAR (extrapolated) = 1.13 W/kg **SAR(1 g) = 0.090 W/kg; SAR(10 g) = 0.037 W/kg** Maximum value of SAR (measured) = 0.303 W/kg

Appendix E: System Calibration Certificate

Certificate No: Z17-97078

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Glossary:

Connector Angle information used in DASY system to align probe sensor X to the robot coordinate system Calibration is Performed According to the Following Standards:

- a) IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013.
- b) IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)". **July 2016**
- c) IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)". March 2010

d) KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- NORMx, y, z: Assessed for E-field polarization 0=0 (fs900MHz in TEM-cell; f>1800MHz: waveguide). NORMx, y, z are only intermediate values, i.e., the uncertainties of NORMx, y, z does not effect the $E²$ -field uncertainty inside TSL (see below ConvF).
- $NORM(f)x, y, z = NORMx, y, z^* frequency$ requency response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCPx, y, z: DCP are numerical linearization parameters assessed based on the data of power sweep (no uncertainty required). DCP does not depend on frequency nor media.
- PAR: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics.
- Ax, y, z; Bx, y, z; Cx, y, z; VRx, y, z: A, B, C are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters: Assessed in flat phantom using E-field (or Temperature Transfer Standard for f≤800MHz) and inside waveguide using analytical field distributions based on power measurements for f >800MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty valued are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORMx, y.z* ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from±50MHz to±100MHz.
- Spherical isotropy (3D deviation from isotropy): in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle: The angle is assessed using the information gained by determining the NORMx (no uncertainty required).

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Probe EX3DV4

SN: 3924

Calibrated: June 27, 2017

Calibrated for DASY/EASY Systems

(Note: non-compatible with DASY2 system!)

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DASY/EASY - Parameters of Probe: EX3DV4 - SN: 3924

Basic Calibration Parameters

Modulation Calibration Parameters

The reported uncertainty of measurement is stated as the standard uncertainty of Measurement multiplied by the coverage factor k=2, which for a normal distribution Corresponds to a coverage probability of approximately 95%.

 A The uncertainties of Norm X, Y, Z do not affect the E^2 -field uncertainty inside TSL (see Page 5 and Page 6). B Numerical linearization parameter: uncertainty not required.

E Uncertainly is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

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DASY/EASY - Parameters of Probe: EX3DV4 - SN: 3924

Calibration Parameter Determined in Head Tissue Simulating Media

^C Frequency validity above 300 MHz of ±100MHz only applies for DASY v4.4 and higher (Page 2), else it is restricted to ±50MHz. The uncertainty is the RSS of ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

F At frequency below 3 GHz, the validity of tissue parameters (ε and σ) can be relaxed to ±10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ±5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters. ^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for the frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

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DASY/EASY - Parameters of Probe: EX3DV4 - SN: 3924

Calibration Parameter Determined in Body Tissue Simulating Media

^C Frequency validity above 300 MHz of ±100MHz only applies for DASY v4.4 and higher (Page 2), else it is restricted to ±50MHz. The uncertainty is the RSS of ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

FAt frequency below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ±10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ε and σ) is restricted to ±5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters. ^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary

effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for the frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

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Uncertainty of Frequency Response of E-field: ±7.4% (k=2)

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DASY/EASY - Parameters of Probe: EX3DV4 - SN: 3924

Other Probe Parameters

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Calibration information for Dipole

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Glossary⁻

Calibration is Performed According to the Following Standards:

- a) IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- b) IEC 62209-1, "Procedure to measure the Specific Absorption Rate (SAR) For hand-held devices used in close proximity to the ear (frequency range of 300MHz to 3GHz)", February 2005
- c) IEC 62209-2, "Procedure to measure the Specific Absorption Rate (SAR) For wireless communication devices used in close proximity to the human body (frequency range of 30MHz to 6GHz)", March 2010
- d) KDB865664, SAR Measurement Requirements for 100 MHz to 6 GHz

Additional Documentation:

e) DASY4/5 System Handbook

Methods Applied and Interpretation of Parameters:

- Measurement Conditions: Further details are available from the Validation Report at the end of the certificate. All figures stated in the certificate are valid at the frequency indicated.
- Antenna Parameters with TSL: The dipole is mounted with the spacer to position its feed point exactly below the center marking of the flat phantom section, with the arms oriented parallel to the body axis.
- Feed Point Impedance and Return Loss: These parameters are measured with the dipole positioned under the liquid filled phantom. The impedance stated is transformed from the measurement at the SMA connector to the feed point. The Return Loss ensures low reflected power. No uncertainty required.
- Electrical Delay: One-way delay between the SMA connector and the antenna feed point. No uncertainty required.
- SAR measured: SAR measured at the stated antenna input power.
- SAR normalized: SAR as measured, normalized to an input power of 1 W at the antenna connector
- SAR for nominal TSL parameters: The measured TSL parameters are used to calculate the nominal SAR result.

The reported uncertainty of measurement is stated as the standard uncertainty of Measurement multiplied by the coverage factor $k=2$, which for a normal distribution Corresponds to a coverage probability of approximately 95%.

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Measurement Conditions

DASY system configuration, as far as not given on page 1.

Head TSL parameters

S.

The following parameters and calculations were applied

normalized to 1W

250 mW input power

normalized to 1W

6.02 mW /g ± 20.4 % (k=2)

1.61 mW / g 6.36 mW /g ± 20.4 % (k=2)

Body TSL parameters

The following parameters and calculations were applied

SAR for nominal Head TSL parameters

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SAR measured

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HHR

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Dipole Impedance and Return Loss calibration Report

Environment of Test Site

Test Data

Comparison with Original report

Result

Compliance

Shenzhen Zhongjian Nanfang Testing Co., Ltd. Project No.: CCISE1708061

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Glossary: DAE Connector angle

data acquisition electronics information used in DASY system to align probe sensor X to the robot coordinate system.

Methods Applied and Interpretation of Parameters:

- DC Voltage Measurement: Calibration Factor assessed for use in DASY system by comparison with a calibrated instrument traceable to national standards. The figure given corresponds to the full scale range of the voltmeter in the respective range.
- Connector angle: The angle of the connector is assessed measuring the angle mechanically by a tool inserted. Uncertainty is not required.
- The report provide only calibration results for DAE, it does not contain other α performance test results.

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DC Voltage Measurement

Connector Angle

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------End of Report------