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# TEST REPORT

**Product Name** : Nighthunter C35  
**Model Number** : Nighthunter C35  
**FCC ID** : 2AKU5ZG24

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**Report Number** : ENS2307070248W00502R  
**Date(s) of Tests** : July 7, 2023 to August 6, 2023  
**Date of issue** : August 6, 2023

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# 1. TEST RESULT CERTIFICATION

Applicant : Wuhan Guide Sensmart Tech Co., Ltd  
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 Manufacturer : Wuhan Guide Sensmart Tech Co., Ltd  
 Address : NO.29,Gaoxin 3rd Road Donghu New-tech Development Zone Wuhan China  
 EUT : Nighthunter C35  
 Model Name : Nighthunter C35  
 Trademark : Guide

**Measurement Procedure Used:**

APPLICABLE STANDARDS	
STANDARD	TEST RESULT
FCC 47 CFR Part 2 (2.1093) , IEEE C95.1:1992, IEEE 1528:2013 KDB 865664 D01 v01r04, KDB 865664 D02 v01r02, KDB 248227 D01 v02r02 KDB 447498 D01 v06, KDB 616217 D04 v01r02	PASS

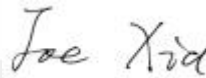
This report is for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence, provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents. Unless specific mention, the uncertainty of measurement has been explicitly taken into account to declare the compliance or non-compliance to the specification.

Prepared by :



Jim Cai/Editor

Reviewer :



Joe Xia/Supervisor

Approve & Authorized Signer :



Lisa Wang/Manager



CERTIFICATION: The above equipment have been tested by EMTEK (SHENZHEN) CO., LTD. Bldg 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. This report shall not be reproduced, except in full, without the written approval of EMTEK (SHENZHEN) CO., LTD.

Equipment Class	Mode	Highest Reported Body SAR <sub>1g</sub> (W/kg)
DTS	2.4G WLAN	0.405

**Note:**

1. The SAR limit (**Head & Body: SAR<sub>1g</sub> 1.6 W/kg, Extremity: SAR<sub>10g</sub> 4.0 W/kg**) for general population/uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.



## 2. Description of Equipment Under Test

<b>EUT Type</b>	Nighthunter C35
<b>Trade Mark</b>	Guide
<b>Model Name</b>	Nighthunter C35
<b>Tx Frequency Bands (Unit: MHz)</b>	WLAN(2.4G) : 2412 ~ 2462
<b>Uplink Modulations</b>	802.11b : DSSS 802.11a/g/n : OFDM
<b>Maximum Tune-up Conducted Power (Unit: dBm)</b>	WLAN 2.4G :
<b>Power supply</b>	DC 5V/2A from Adapter, DC 7.3V from battery
<b>Antenna Type</b>	FPC Antenna
<b>EUT Stage</b>	Identical Prototype



### 3. SAR Measurement System

#### 3.1 Definition of Specific Absorption Rate (SAR)

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

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

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

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

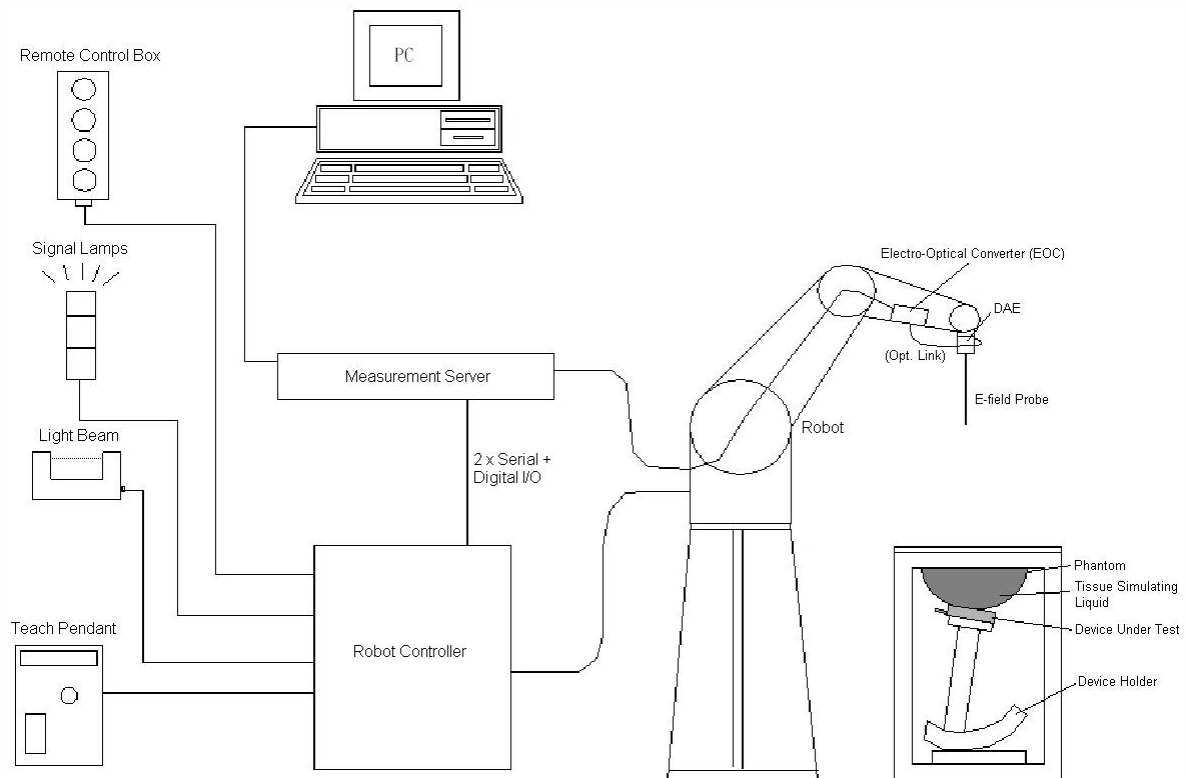
SAR measurement can be related to the electrical field in the tissue by

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

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

#### 3.2 SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC.

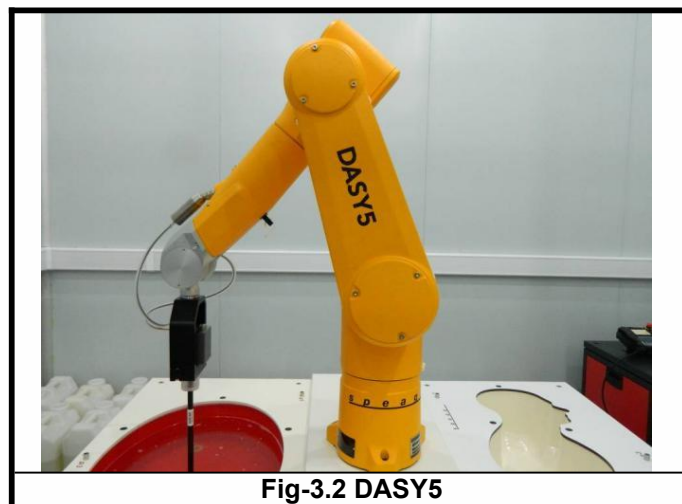


**Fig-3.1 DASY System Setup**

### 3.2.1 Robot

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

- High precision (repeatability  $\pm 0.035$  mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)




**Fig-3.2 DASY5**




### 3.2.2 Probes


The SAR measurement is conducted with the dosimetric probe. 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.


<b>Model</b>	EX3DV4	
<b>Construction</b>	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
<b>Frequency</b>	10 MHz to 6 GHz Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.3$ dB in HSL (rotation around probe axis) $\pm 0.5$ dB in tissue material (rotation normal to probe axis)	
<b>Dynamic Range</b>	10 $\mu$ W/g to 100 mW/g Linearity: $\pm 0.2$ dB (noise: typically $< 1$ $\mu$ W/g)	
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

### 3.2.3 Data Acquisition Electronics (DAE)


<b>Model</b>	DAE4	
<b>Construction</b>	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
<b>Measurement Range</b>	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
<b>Input Offset Voltage</b>	$< 5$ $\mu$ V (with auto zero)	
<b>Input Bias Current</b>	$< 50$ fA	
<b>Dimensions</b>	60 x 60 x 68 mm	

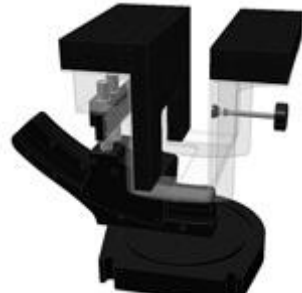
### 3.2.4 Phantoms

<b>Model</b>	Twin SAM	
<b>Construction</b>	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.	
<b>Material</b>	Vinylester, glass fiber reinforced (VE-GF)	
<b>Shell Thickness</b>	2 ± 0.2 mm (6 ± 0.2 mm at ear point)	
<b>Dimensions</b>	Length: 1000 mm Width: 500 mm Height: adjustable feet	
<b>Filling Volume</b>	approx. 25 liters	


<b>Model</b>	ELI	
<b>Construction</b>	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
<b>Material</b>	Vinylester, glass fiber reinforced (VE-GF)	
<b>Shell Thickness</b>	2.0 ± 0.2 mm (bottom plate)	
<b>Dimensions</b>	Major axis: 600 mm Minor axis: 400 mm	
<b>Filling Volume</b>	approx. 30 liters	

### 3.2.5 Device Holder

<b>Model</b>	Mounting Device	
<b>Construction</b>	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
<b>Material</b>	POM	

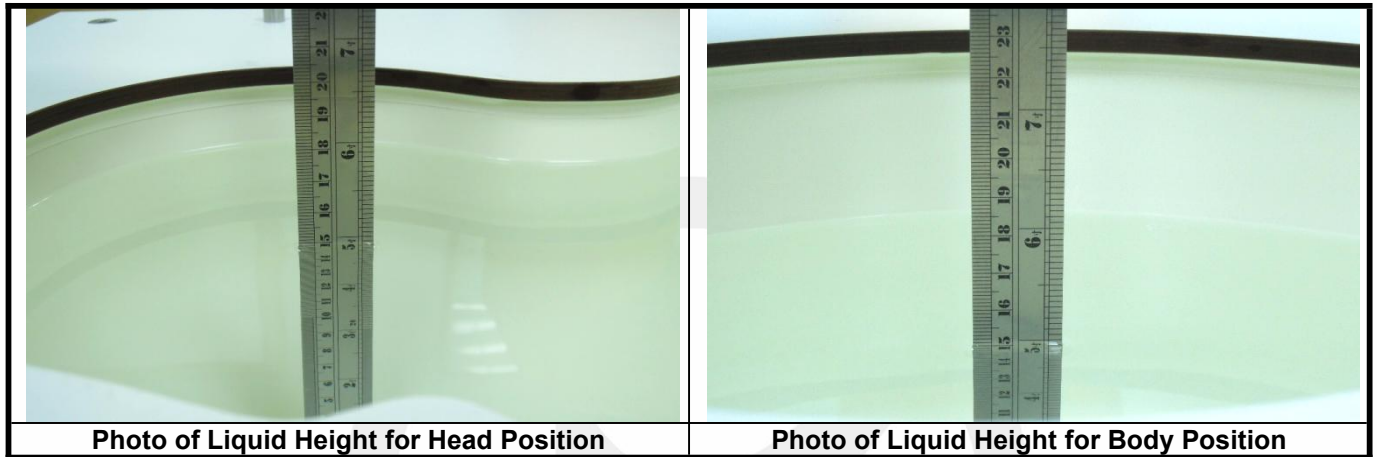
<b>Model</b>	Laptop Extensions Kit	
<b>Construction</b>	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
<b>Material</b>	POM, Acrylic glass, Foam	

### 3.2.6 System Validation Dipoles

<b>Model</b>	D-Serial	
<b>Construction</b>	Symmetrical dipole with 1/4 balun. Enables measurement of feedpoint impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
<b>Frequency</b>	750 MHz to 5800 MHz	
<b>Return Loss</b>	> 20 dB	
<b>Power Capability</b>	> 100 W (f < 1GHz), > 40 W (f > 1GHz)	

### 3.2.7 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. 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. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.



The dielectric properties of the head tissue simulating liquids are defined in IEEE1528, and KDB 865664 D01 Appendix A. For the body tissue simulating liquids, the dielectric properties are defined in KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

**Table-3.1 Targets of Tissue Simulating Liquid**

Frequency (MHz)	Target Permittivity	Range of $\pm 5\%$	Target Conductivity	Range of $\pm 5\%$
<b>For Head</b>				
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53

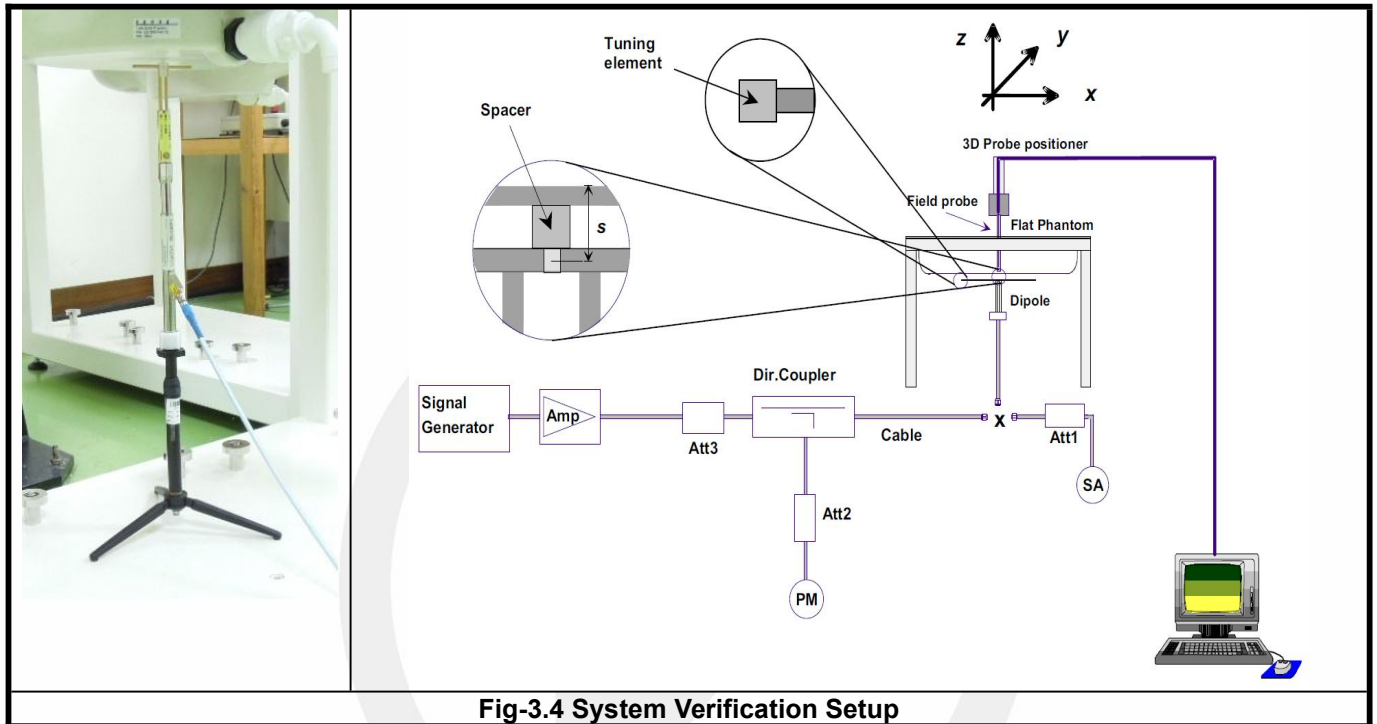
The following table gives the recipes for tissue simulating liquids.

**Table-3.2 Recipes of Tissue Simulating Liquid**

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

### 3.3 SAR System Verification

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



**Fig-3.4 System Verification Setup**

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 3 GHz, 100 mW is used for 3.5 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.



### 3.4 SAR Measurement Procedure

According to the SAR 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

The SAR measurement procedures for each of test conditions are as follows:

- (a) Make EUT to transmit maximum output power
- (b) Measure conducted output power through RF cable
- (c) Place the EUT in the specific position of phantom
- (d) Perform SAR testing steps on the DASY system
- (e) Record the SAR value

#### 3.4.1 Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664D01, the resolution for Area and Zoom scan is specified in the table below.

Items	≤ 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan ( $\Delta x, \Delta y$ )	≤ 15 mm	≤ 12 mm	≤ 12 mm	≤ 10 mm	≤ 10 mm
Zoom Scan ( $\Delta x, \Delta y$ )	≤ 8 mm	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 4 mm
Zoom Scan ( $\Delta z$ )	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 3 mm	≤ 2 mm
Zoom Scan Volume	≥ 30 mm	≥ 30 mm	≥ 28 mm	≥ 25 mm	≥ 22 mm

**Note:**

When zoom scan is required and report SAR is  $\leq 1.4$  W/kg, the zoom scan resolution of  $\Delta x / \Delta y$  (2-3GHz:  $\leq 8$  mm, 3-4GHz:  $\leq 7$  mm, 4-6GHz:  $\leq 5$  mm) may be applied.

#### 3.4.2 VolumeScan Procedure

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.

### 3.4.3 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 drift more than 5%, the SAR will be retested.

### 3.4.4 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 from 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

### 3.4.5 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 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.



## 4. SAR Measurement Evaluation

### 4.1 Applicable Standards

KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04

KDB 865664 D02 RF Exposure Reporting v01r02

KDB 248227 D01 802.11 Wi-Fi SAR v02r02

KDB 447498 D01 General RF Exposure Guidance v06

FCC 47 CFR Part 2 (2.1093)

### 4.2 EUT Configuration and Setting

#### <Considerations Related to WLAN for Setup and Testing>

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

According to KDB 248227 D01, this device has installed WLAN engineering testing software which can provide continuous transmitting RF signal. During WLAN SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

#### Initial Test Configuration

An initial test configuration is determined for OFDM transmission modes in 2.4 GHz and 5 GHz bands according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

#### Subsequent Test Configuration

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. When the highest reported SAR for the initial test configuration according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the

subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg, SAR is not required for that subsequent test configuration.

### **SAR Test Configuration and Channel Selection**

When multiple channel bandwidth configurations in a frequency band have the same specified maximum output power, the initial test configuration is using largest channel bandwidth, lowest order modulation, lowest data rate, and lowest order 802.11 mode (i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n). After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following.

- 1) The channel closest to mid-band frequency is selected for SAR measurement.
- 2) For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.



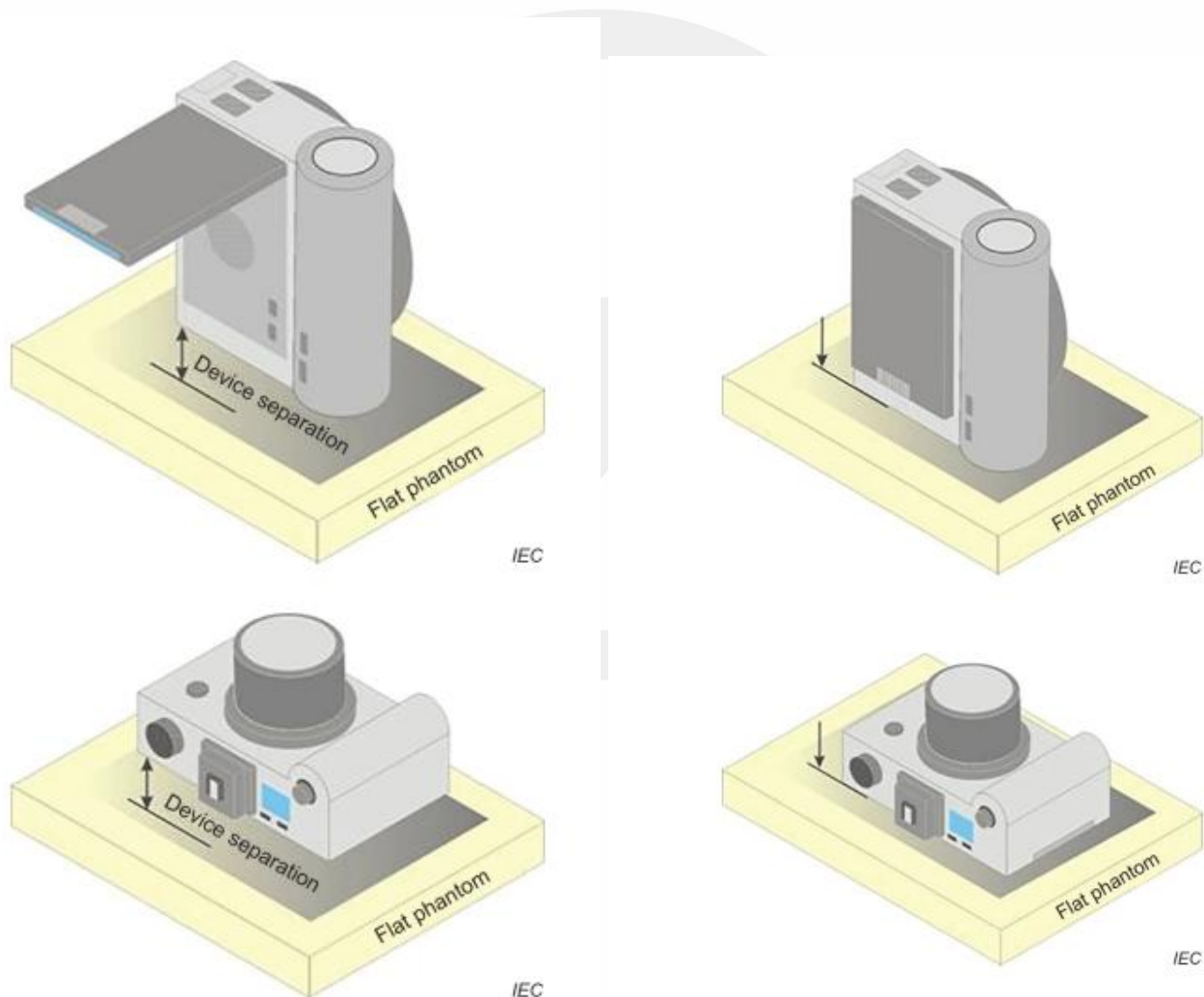
## 4.3 EUT Testing Position

### 4.3.1 Front-of-face device

typical example of a front-of-face device is a two-way radio that is held at a close distance from the face of the user while transmitting. Other devices that fall into this category include wireless-enabled still cameras and video cameras capable of sending data to a network or other device (Figure 10 a)).

To assess this type of device, the following apply:

- The DUT shall be positioned at a test separation distance to the phantom surface in accordance with the conditions of 7.2.4.1.2.
- For a device with intended use that requires contact with the user's face (e.g. device with an optical viewfinder), such a device shall be placed directly against the phantom (Figure 10 a), right side).



**Fig-4.1 Still cameras and video cameras**

**<Antenna Location>**

**EUT Top Side**

**EUT Left Side**

**EUT Right Side**



**<EUT Front View>**

The separation distance for antenna to edge:

Antenna	To Left Side (mm)	To Right Side (mm)	To Top Side (mm)	To Rear Face (mm)	To Bottom Side (mm)	To Front Face (mm)
WLANAntenna A	10	65	110	45	25	30

### 4.3.2 SAR Test Exclusion Evaluations

According to KDB 447498 D01, the SAR test exclusion condition is based on source-based time-averaged maximum conducted output power, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The SAR exclusion threshold is determined by the following formula.

1. For the test separation distance  $\leq 50$  mm

$$\frac{\text{Max. Tune up Power}_{(mW)}}{\text{Min. Test Separation Distance}_{(mm)}} \times \sqrt{f_{(GHz)}} \leq 3.0 \text{ for SAR-1g, } \leq 7.5 \text{ for SAR-10g}$$

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

2. For the test separation distance  $> 50$  mm, and the frequency at 100 MHz to 1500 MHz

$$\left[ (\text{Threshold at 50 mm in Step 1}) + (\text{Test Separation Distance} - 50 \text{ mm}) \times \left( \frac{f_{(MHz)}}{150} \right) \right]_{(mW)}$$

3. For the test separation distance  $> 50$  mm, and the frequency at  $> 1500$  MHz to 6 GHz

$$[(\text{Threshold at 50 mm in Step 1}) + (\text{Test Separation Distance} - 50 \text{ mm}) \times 10]_{(mW)}$$

#### <For Antenna A for WLAN >

Mode	Max. Tune-up Power (dBm)	Max. Tune-up Power (mW)	LeftSide			RightSide			TopSide			BottomSide		
			Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?
2.4GWIFI	17.00	50.12	10	7.9	Yes	65	246 mW	No	110	696 mW	No	25	3.1	Yes

#### Note:

- When separation distance  $\leq 50$  mm and the calculated result shown in above table is  $\leq 3.0$  for SAR-1g exposure condition, or  $\leq 7.5$  for SAR-10g exposure condition, the SAR testing exclusion is applied.
- When separation distance  $> 50$  mm and the device output power is less than the calculated result (power threshold, mW) shown in above table, the SAR testing exclusion is applied.

#### 4.4 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Liquid Temp. (°C)	Measured Conductivity ( $\sigma$ )	Measured Permittivity ( $\epsilon_r$ )	Target Conductivity ( $\sigma$ )	Target Permittivity ( $\epsilon_r$ )	Conductivity Deviation (%)	Permittivity Deviation (%)
Aug.4, 2023	Head	2450	22.4	1.78	39.70	1.80	39.20	-1.11	1.28

**Note:**

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within  $\pm 5\%$  of the target values. Liquid temperature during the SAR testing must be within  $\pm 2$  °C.

#### 4.5 System Validation

The SAR measurement system was validated according to procedures in KDB 865664 D01. The validation status in tabulated summary is as below.

Calibration Date	Probe S/N	Calibration Point		Measured Conductivity ( $\sigma$ )	Measured Permittivity ( $\epsilon_r$ )	Validation for CW			Validation for Modulation		
						Sensitivity Range	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
Aug.4, 2023	3970	Head	2450	1.78	39.70	Pass	Pass	Pass	OFDM	N/A	Pass

## 4.6 System Verification

The measuring result for system verification is tabulated as below.

Test Date	Mode	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Aug.4, 2023	Head	2450	52.10	13.08	52.32	0.42	927	3970	1418

**Note:**

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.



## 4.7 Maximum Output Power

### 4.7.1 Maximum Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

Mode	2.4G WLAN
802.11b	17.00
802.11g	16.50
802.11a	N/A
802.11n HT20	17.00
802.11n HT40	N/A
802.11ac VHT20	N/A
802.11ac VHT40	N/A
802.11ac VHT80	N/A

### 4.7.2 Measured Conducted Power Result

The measuring conducted power (Unit: dBm) is shown as below.

#### <WLAN 2.4G>

Mode	802.11b		
Channel / Frequency (MHz)	1 (2412)	6 (2437)	11 (2462)
Average Power (Ant-A)	14.74	15.73	16.82
Mode	802.11g		
Channel / Frequency (MHz)	1 (2412)	6 (2437)	11 (2462)
Average Power (Ant-A)	13.85	15.70	16.32
Mode	802.11n (HT20)		
Channel / Frequency (MHz)	1 (2412)	6 (2437)	11 (2462)
Average Power (Ant-A)	14.70	15.07	16.68



## 4.8 SAR Testing Results

### 4.8.1 SAR Test Reduction Considerations

#### <KDB 447498 D01, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

- (1)  $\leq 0.8$  W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
- (2)  $\leq 0.6$  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
- (3)  $\leq 0.4$  W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz

#### <KDB 248227 D01, SAR Guidance for Wi-Fi Transmitters>

- (1) For handsets operating next to ear, hotspot mode or mini-tablet configurations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When the reported SAR of initial test position is  $\leq 0.4$  W/kg, SAR testing for remaining test positions is not required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is  $\leq 0.8$  W/kg or all test positions are measured.
- (2) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is  $\leq 0.8$  W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is  $>1.2$  W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n), SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is  $\leq 1.2$  W/kg.

#### 4.8.2 SAR Results for Body Exposure Condition

Plot No.	Band	Mode	Test Position	Antenna	Ch.	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Power Drift (dB)	Measured SAR-1g (W/kg)	Scaling Factor	Scaled SAR-1g (W/kg)
1	802.11b	-	Rear Face	A	6	16.00	15.73	0.08	0.002	1.064	0.002
	802.11b	-	Front Face	A	6	16.00	15.73	0.16	0.012	1.064	0.013
	802.11b	-	Left Side	A	6	16.00	15.73	-0.10	0.381	1.064	0.405
	802.11b	-	Bottom Side	A	6	16.00	15.73	0.11	0.067	1.064	0.071

Note:

SAR tests use the same power level as RF tests.

Due the antenna location and antenna performance results much lower SAR result ,and lower than the lowest system limit, then we show “<0.001W/Kg” in the report

#### 4.8.3 2.4GHz 802.11g/n OFDM SAR Test Exclusion Consideration:

Modulation Mode	P <sub>avg</sub> (dBm)	P <sub>avg</sub> (mW)	Reported SAR (W/Kg)	Adjusted SAR (W/kg)	Limit (W/Kg)	SAR Test Exclusion
802.11b(DSSS)	17.00	50.12	0.405	/	/	/
802.11g(OFDM)	16.50	44.67	/	0.393	1.2	Yes
802.11n(OFDM)	17.00	50.12	/	0.405	1.2	Yes

Note:

When the highest *reported* SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.

#### 4.8.4 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probecalibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are  $\leq 1.45$  W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is  $\leq 1.10$ , the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR repeated measurement procedure:

1. When the highest measured SAR is  $< 0.80$  W/kg, repeated measurement is not required.
2. When the highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
3. 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  $\geq 1.45$  W/kg, perform a second repeated measurement.
4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is  $> 1.20$ , and the original, first or second repeated measurement is  $\geq 1.5$  W/kg, perform a third repeated measurement.

Band	Test Position	Fr.	Original Measured SAR-1g (W/kg)	1st Repeated SAR-1g (W/kg)	L/S Ratio	2nd Repeated SAR-1g (W/kg)	L/S Ratio	3rd Repeated SAR-1g (W/kg)	L/S Ratio
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	927	Feb. 16, 2022	3 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	3970	May. 17, 2023	1 Year
Data Acquisition Electronics	SPEAG	DAE4	1418	Apr. 25, 2023	1 Year
ENA Series Network Analyzer	Agilent	E5071B	MY42404246	May. 14, 2023	1 Year
Signal Analyzer	Agilent	N9010A	MY53470879	May. 14, 2023	1Year
Signal Generator	Agilent	SMM100A	17-1050100-C	May. 9, 2023	1 Year
Power Sensor	Agilent	E9304A H18	MY52050011	May. 17, 2023	1 Year
Power Meter	BOONTON	4232A	10539	May. 14, 2023	1 Year
Power Sensor	BOONTON	51011EMC	36164	May. 14, 2023	1 Year
Electronic Thermometer	Hegao	HTC-1	\	May. 17, 2023	1 Year
Directional Coupler	MILMEGA	DC6180AM1	0340463	May. 14, 2023	1 Year



## 5. Measurement Uncertainty

Source of Uncertainty	Tolerance (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (± %, 1g)	Standard Uncertainty (± %, 10g)	Vi
<b>Measurement System</b>								
Probe Calibration	6.0	Normal	1	1	1	6.05	6.05	∞
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	∞
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Probe Modulation Response	2.4	Rectangular	√3	1	1	1.4	1.4	∞
Detection Limits	0.25	Rectangular	√3	1	1	0.14	0.14	∞
Boundary Effect	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Readout Electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response Time	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Integration Time	1.7	Rectangular	√3	1	1	1.0	1.0	∞
RF Ambient Conditions – Noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF Ambient Conditions – Reflections	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe Positioner Mech. Restrictions	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe Positioning with Respect to Phantom Shell	2.9	Rectangular	√3	1	1	1.7	1.7	∞
Post-processing	2.0	Rectangular	√3	1	1	1.2	1.2	∞
<b>Test Sample Related</b>								
Device Holder Uncertainty	4.2 / 1.8	Normal	1	1	1	4.2	1.8	32
Test Sample Positioning	1.5 / 0.7	Normal	1	1	1	1.5	0.7	32
Power Scaling	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Power Drift of Measured SAR	5.0	Rectangular	√3	1	1	2.9	2.9	∞
<b>Phantom and Setup</b>								
Phantom Uncertainty (Shape and Thickness Tolerances)	7.2	Rectangular	√3	1	1	4.2	4.2	∞
Algorithm for Correcting SAR for	1.2 / 0.97	Normal	1	1	0.84	1.2	0.8	∞

Deviations in Permittivity and Conductivity								
Liquid Conductivity (Meas.)	1.0	Normal	1	0.78	0.71	0.8	0.7	25
Liquid Permittivity (Meas.)	0.5	Normal	1	0.23	0.26	0.1	0.1	25
Liquid Conductivity– Temperature Uncertainty	2.2	Rectangular	$\sqrt{3}$	0.78	0.71	1.0	0.9	$\infty$
Liquid Permittivity– Temperature Uncertainty	1.9	Rectangular	$\sqrt{3}$	0.23	0.26	0.3	0.3	$\infty$
<b>Combined Standard Uncertainty</b>						<b>±12.1%</b>	<b>± 11.4 %</b>	
<b>Expanded Uncertainty (K=2)</b>						<b>±24.2%</b>	<b>±22.8%</b>	

**Uncertainty budget for frequency range 300 MHz to 3 GHz**



Source of Uncertainty	Tolerance (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (± %, 1g)	Standard Uncertainty (± %, 10g)	Vi
<b>Measurement System</b>								
Probe Calibration	6.55	Normal	1	1	1	6.65	6.65	∞
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	∞
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Probe Modulation Response	2.4	Rectangular	√3	1	1	1.4	1.4	∞
Detection Limits	0.25	Rectangular	√3	1	1	0.14	0.14	∞
Boundary Effect	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Readout Electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response Time	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Integration Time	1.7	Rectangular	√3	1	1	1.0	1.0	∞
RF Ambient Conditions – Noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF Ambient Conditions – Reflections	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe Positioner Mech. Restrictions	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe Positioning with Respect to Phantom Shell	6.7	Rectangular	√3	1	1	3.9	3.9	∞
Post-processing	4.0	Rectangular	√3	1	1	2.3	2.3	∞
<b>Test Sample Related</b>								
Device Holder Uncertainty	4.2 / 1.8	Normal	1	1	1	4.2	1.8	32
Test Sample Positioning	1.5 / 0.7	Normal	1	1	1	1.5	0.7	32
Power Scaling	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Power Drift of Measured SAR	5.0	Rectangular	√3	1	1	2.9	2.9	∞
<b>Phantom and Setup</b>								
Phantom Uncertainty (Shape and Thickness Tolerances)	7.6	Rectangular	√3	1	1	4.4	4.4	∞
Algorithm for Correcting SAR for Deviations in Permittivity and Conductivity	1.2 / 0.97	Normal	1	1	0.84	1.2	0.8	∞

Liquid Conductivity (Meas.)	1.0	Normal	1	0.78	0.71	0.8	0.7	25
Liquid Permittivity (Meas.)	0.5	Normal	1	0.23	0.26	0.1	0.1	25
Liquid Conductivity– Temperature Uncertainty	2.2	Rectangular	$\sqrt{3}$	0.78	0.71	1.0	0.9	$\infty$
Liquid Permittivity– Temperature Uncertainty	1.9	Rectangular	$\sqrt{3}$	0.23	0.26	0.3	0.3	$\infty$
<b>Combined Standard Uncertainty</b>						<b>±13.2%</b>	<b>±12.5</b>	
<b>Expanded Uncertainty (K=2)</b>						<b>±26.4%</b>	<b>±25.0%</b>	

Uncertainty budget for frequency range 3 GHz to 6 GHz





## **6. Information on the Testing Laboratories**

We, EMTEK (SHENZHEN) CO., LTD., were founded in 2000 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

Site Description

EMC Lab.

: **Accredited by CNAS**

The Certificate Registration Number is L2291.

The Laboratory has been assessed and proved to be in compliance with CNAS-CL01 (identical to ISO/IEC 17025:2017)

**Accredited by FCC**

Designation Number: CN1204

Test Firm Registration Number: 882943

**Accredited by A2LA**

The Certificate Number is 4321.01.

**Accredited by Industry Canada**

The Conformity Assessment Body Identifier is CN0008

Name of Firm

: EMTEK (SHENZHEN) CO., LTD.

Site Location

: Building 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China

If you have any comments, please feel free to contact us at the following:

Add: Bldg 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China

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**Web Site:** [www.emtek.com.cn](http://www.emtek.com.cn)

The road map of all our labs can be found in our web site also.

--- End of Report ---

## Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.



## Appendix B. SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination are shown as follows.



## Appendix C. Calibration Certificate for Probe and Dipole

The calibration certificates are shown as follows.



## Appendix D. Photographs of EUT and Setup

