

FCC SAR TEST REPORT

For

iTraq, Inc.

Personal Tracker

Model No.: iTraq 3

Prepared For : iTraq, Inc.

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States

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TEST REPORT

Applicant : iTraq, Inc.

Manufacturer : Minewing (Shenzhen) Electronics Integrated Co., Ltd

Product Name : Personal Tracker

Model No. : iTraq 3

Trade Mark : N/A

Rating(s) : DC 3.7V from battery or DC 5V from USB

Test Standard(s) : IEEE 1528-2013; IEC 62209-2:2010;

ANSI/IEEE C95.1:2005; FCC 47 CFR Part 2 (2.1093:2013);

The device described above is tested by Shenzhen Anbotek Compliance Laboratory Limited to determine the maximum emission levels emanating from the device and the severe levels of the device can endure and its performance criterion. The measurement results are contained in this test report and Shenzhen Anbotek Compliance Laboratory Limited is assumed full of responsibility for the accuracy and completeness of these measurements. Also, this report shows that the EUT (Equipment Under Test) is technically compliant with the IEEE 1528-2013, IEC 62209-2:2010, FCC 47 CFR Part 2 (2.1093:2013), ANSI/IEEE C95.1:2005 requirements.

This report applies to above tested sample only and shall not be reproduced in part without written approval of Shenzhen Anbotek Compliance Laboratory Limited.

Date of Test	Jan. 1/~Feb. 2/, 2019
Prepared By	Dolly Wang
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Anbotek Product Sofety	(Engineer / Bobby Wang)
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	Sally Zhang
Approved & Authorized Signer	Anbotek Anbotek Anbotek Anbote
Anb Lotek Anbotek Anbot Lok Botek	(Manager / Sally Zhang)
	ton alone



Version

	Version No.	Date	Description
potek	01ºotek	2019-02-27	Original
Anbote	k Anboro	Anbotek Anbot	Anbotek Anbotek Anbotek Anbotek
Anb	otek Anbo hote	Anbotek An	Jole Annotek Anbotek Anbotek Anbot
F	"upore. Vup	otek Anbotek	Anbotek Anbotek Anbotek Anbotek An
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Jose otel	k Anbotek	Anbotek Anboe	W Anbotek Anbotek Anbotek Anbotek



1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing are as follows.

Eug gwar ay Dan d	Highest Repor	SAR Test Limit	
FrequencyBand	Body-worn(10mm)	Hotspot(10mm)	(W/Kg)
GSM 850	0.627	0.627	otek Anbotek Anbe
PCS 1900	0.354	0.354	otek Anbotek Al
WCDMA Band 2	0.162	0.162	mbo tek 1 Cabotek
WCDMA Band 5	0.384	0.384	Anbor 1.6 in botek
WIFI 2.4G	0.414	0.414	Anbote Ans Sotek
Simultaneous SAR	1.041	1.041	Anbote. And
Test Result	inhote And Stek	anbotek Anbos An	PASS

<Highest SAR Summary>

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-2005, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and IEC 62209-2:2010



2. General Information

2.1. Client Information

Applicant	:	iTraq, Inc.
Address	:	8201 164th Ave NE, Suite 200, Redmond, Washington, 98052, United States
Manufacturer	:	Minewing (Shenzhen) Electronics Integrated Co., Ltd
Address	:	Floor#2, Building H2,Hongfa-Tech Park,No.32 Tong Tau Road, Shi'yan Town, Bao'an District, Shenzhen, China,518108
Factory	:	Minewing (Shenzhen) Electronics Integrated Co., Ltd
Address	:	Floor#2, Building H2,Hongfa-Tech Park,No.32 Tong Tau Road, Shi'yan Town, Bao'an District, Shenzhen, China,518108

2.2. Testing Laboratory Information

Test Site:	:	Shenzhen Anbotek Compliance Laboratory Limited
Address:	:	1/F, Building D, Sogood Science and Technology Park, Sanwei community,
		Hangcheng Street, Bao'an District, Shenzhen, Guangdong, China.518102

2.3. Description of EquipmentUnder Test (EUT)

Product Name	:	Personal Tracker
Model No.	:	iTraq 3 otek Anbotek Anbotek Anbotek Anbotek Anbotek
Trade Mark	:	N/A Anbotek Anbotek Anbotek Anbotek Anbotek Anbotek Anbotek
Test Power Supply	:	DC 3.7V Battery inside
Test Sample No.	:	S1(Normal Sample), S2(Engineering Sample)
Product Description	:	GPRS 850:



- V	MOLE WILL	App.
	Anbotek Anbot	BLE:1 Mbits/s
	Transfer Rate:	802.11b:11/5.5/2/1Mbps
e	tek abotek Anbot	802.11g:54/48/36/24/18/12/9/6 Mbps
	or VII.	802.11n: up to 150Mbps
0	Number of Channel:	BLE: 40 Channels
6	Number of Chainer.	802.11b/ g/ n(HT20): 11 Channels
r	An Otek Anboten	GPRS: GMSK
	Anbo hotek	WCDMA: BPSK, 16QAM;
	Modulation Type:	BLE:GFSK
2)	otek Anbotek Anbo	802.11b: CCK; 802.11g/n: OFDM
	notek Anhoten Anh	GPRS: PIFA Antenna
	nbe tak mabatak Al	WCDMA: PIFA Antenna
P	Antenna Type:	BLE: PCB Antenna
	Anbotek Anbo	802.11b/ g/ n(HT20): PCB Antenna
	- Aupotes Aupor	GSM850 : 1.71dBi, GSM1900 :2.32dBi,
A	Antenna Gain(Peak):	FDD Band V: 1.71 dBi, FDD Band II:2.32 dBi,
	A Sum (1 Cum).	2.4GWiFi: 1dBi, BLE: 0dBi
C	tak about All	2.70 HII I. IUDI, DEL. VUDI



2.4. Device Category and SAR Limits

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user. Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

2.5. Applied Standard

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

- IEEE 1528-2013
- FCC 47 CFR Part 2 (2.1093:2013)
- ANSI/IEEE C95.1:2005
- IEC 62209-2:2010
- KDB 248227 D01
- KDB 447498 D01
- KDB 616217 D04
- KDB 648474 D04
- KDB 865664 D01
- KDB 941225 D01
- KDB 941225 D06
- KDB 941225 D07

2.6. Environment of Test Site

Items	Required	Actual
Temperature (℃)	18-25	22~23
Humidity (%RH)	30-70	55~65

2.7. Test Configuration

The device was controlled by using a base station emulator. Communication between the device and the emulator was established by air link. The distance between the EUT and the antenna of the emulator is larger than 50 cm and the output power radiated from the emulator antenna is at least 30 dB smaller than the output power of EUT. The EUT was set from the emulator to radiate maximum output power during all tests. For WLAN SAR testing, WLAN engineering testing software installed on the EUT can provide continuous transmitting RF signal.



3. Specific Absorption Rate (SAR)

3.1. Introduction

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

3.2. SAR Definition

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

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

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

SAR measurement can be either related to the temperature elevation in tissue by

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

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

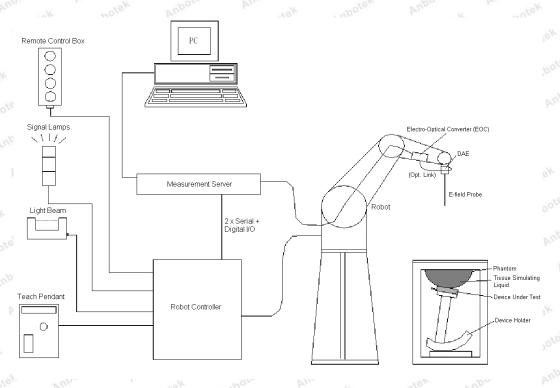
$$SAR = \frac{\sigma |E|^2}{\rho}$$

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.



4. SAR Measurement System



DASY System Configurations

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

- A standard high precision 6-axis robot with controller, a teach pendant and software
- A data acquisition electronic (DAE) attached to the robot arm extension
- A dosimetric probe equipped with an optical surface detector system
- The electro-optical converter (EOC) performs the conversion between optical and electrical signals
- A measurement server performs the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning
- A computer operating Windows XP
- DASY software
- Remove control with teach pendant and additional circuitry for robot safety such as warming lamps, etc.
- The SAM twin phantom
- ➤ A device holder
- > Tissue simulating liquid
- Dipole for evaluating the proper functioning of the system

components are described in details in the following sub-sections.



4.1. 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

<EX3DV4 Probe>

Construction	Symmetrical design with triangular core
	Built-in shielding against static charges
	PEEK enclosure material (resistant to
	organic solvents, e.g., DGBE)
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB
Directivity	± 0.3 dB in HSL (rotation around probe
	axis)
	\pm 0.5 dB in tissue material (rotation
	normal to probe axis)
Dynamic Range	$10 \mu \text{W/g}$ to 100 mW/g ; Linearity: $\pm 0.2 \text{ dB}$
	(noise: typically $< 1 \mu W/g$)
Dimensions	Overall length: 330 mm (Tip: 20 mm)
	Tip diameter: 2.5 mm (Body: 12 mm)
	Typical distance from probe tip to dipole
	centers: 1 mm



Photo of EX3DV4

> 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 0.25dB. The sensitivity parameters (NormX, NormY, and NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data can be referred to appendix C of this report.

4.2. Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching 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 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80dB.





Photo of DAE

4.3. Robot

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

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



Photo of DASY5

4.4. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY5: 400 MHz, 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.



Photo of Server for DASY5

4.5. Phantom

<SAM Twin Phantom>

Shell Thickness	$2 \pm 0.2 \text{ mm}$;
	Center ear point: 6 ± 0.2 mm
Filling Volume	Approx. 25 liters
Dimensions	Length: 1000 mm; Width: 500 mm;
	Height: adjustable feet
Measurement Areas	Left Hand, Right Hand, Flat Phantom
	hotek Anboten Anbo tek
	no tek nbotek Anbote K Ani
Y	Anbot Anbotek Anboten A rek nbot An
	Photo of SAM 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>

Shell Thickness	2 ± 0.2 mm (sagging: <1%)	1
Filling Volume	Approx. 30 liters	
Dimensions	Major ellipse axis: 600 mm Minor axis:400 mm	
×	Photo of ELI4 Phantom	

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



4.6. Device Holder

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ± 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-loss POM material having the following dielectric parameters: relative permittivity $\varepsilon = 3$ and loss tangent $\delta = 0.02$. 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.



Device Holder



4.7. 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 verification 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], [A/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:

Probe parameters:	- Sensitivity	$Norm_i, a_{i0}, a_{i1}, a_{i2}$
--------------------------	---------------	----------------------------------

- Conversion factor $ConvF_i$ - Diode compression point dcp_i

Device parameters: - Frequency f

- Crest factor cf

Media parameters: - Conductivity σ

- Density ρ

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)

 $dcp_i = diode compression point (DASY parameter)$

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

E-field Probes:
$$\mathbf{E_i} = \sqrt{\frac{\mathbf{V_i}}{\mathbf{Norm_i \cdot ConvF}}}$$

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= sensor sensitivity of channel i, (i = x, y, z), $\mu V/(V/m)^2$ for E-field Probes

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

H_i= magnetic field strength of channel i in A/m

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

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

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

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

with SAR = local specific absorption rate in mW/g

E_{tot}= total field strength in V/m

 $\sigma = \text{conductivity in [mho/m] or [Siemens/m]}$

 ρ = equivalent 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.



5. Test Equipment List

Manufacture	N. CE.	T /Mr. 1.1	C. LINI	Calib	ration
r	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	835MHz System Validation Kit	D835V2	4d154	Jun. 16,2018	Jun. 15,2021
SPEAG	1750MHz System Validation Kit	D1750V2	1021	Jul. 1,2016	Jun. 30,2019
SPEAG	1900MHz System Validation Kit	D1900V2	5d175	Jun. 15, 2016	Jun. 14, 2019
SPEAG	2450MHz System Validation Kit	D2450V2	910	Jun. 15,2018	Jun. 14,2021
SPEAG	Data Acquisition Electronics	DAE4	387	Sept.06,2018	Sept.05,2019
SPEAG	Dosimetric E-Field Probe	EX3DV4	7396	May 12,2018	May 11,2019
Agilent	ENA Series Network Analyzer	E5071C	MY46317418	Jun.12,2018	Jun.11, 2019
SPEAG	DAK	DAK-3.5	1226	NCR	NCR
SPEAG	ELI Phantom	QDOVA004AA	2058	NCR	NCR
AR	Amplifier	ZHL-42W	QA1118004	NCR	NCR
Agilent	Power Meter	N1914A	MY50001102	Nov. 22, 2018	Nov. 06, 2019
Agilent	Power Sensor	N8481H	MY51240001	Nov. 22, 2018	Nov. 06, 2019
R&S	Spectrum Analyzer	N9020A	MY51170037	May.23, 2018	May. 22, 2019
Agilent	Signal Generation	N5182A	MY48180656	May.23, 2018	May. 22, 2019
Worken	Directional Coupler	0110A05601O-10	COM5BNW1A2	May.23, 2018	May. 22, 2019

Note:

- 1. The calibration certificate of DASY can be referred to appendix C of this report.
- 2. The dipole calibration interval can be extended to 3 years with justification. The dipoles 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 network analyzer and compensated during system check.
- 4. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in pure water) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure and calibration kit are provided by Agilent.
- 5. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to have precise power level to the dipole; the measured SAR will be normalized to 1W input power according to the ratio of 1W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not critically required for correct measurement; the power meter is critical and we do have calibration for it



6. 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. 6.1. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown as followed:



Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquid.

Frequency	Water	Sugar	Cellulose	Salt	Preventol	DGBE	Conductivity	Permittivity
(MHz)	(%)	(%)	(%)	(%)	(%)	(%)	(σ)	(er)
				For Hea	ıd			
900	40.3	57.9	0.2	1.4	ok 0.2 pho	0	0.97	41.5
1750	55.2	Opote	0×upor	0.3	potek 0 A	44.5	1.37	40.1
1800,1900,2000	55.2	0 ,,,,,	stek O Anbr	0.3	not 0	44.5	1.40	40.0
2450	55.0	lek 0	upotek O A	ipor 0	Otek	45.0	1.80	39.2
				For Bod	ly			
900	50.8	48.2	Ootek	0.9	0.1	ok 0 M	0.97	55.2
1750	70.2	Ame O tek	Onbotek	0.4	0	29.4	1.49 An	53.4
1800,1900,2000	70.2	0	tek 0 anbo	0.4	0	29.4	1.52	53.3
2450	68.6	0 800	0 1/6/2	ode 0	Pupor 0	31.4	1.95	52.7



The following table shows the measuring results for simulating liquid.

Tiggue	Measured	Target	Tissue		Measur	ed Tissue		Liquid		
Tissue Type	Frequency (MHz)	$\mathbf{\epsilon_r}$	σ	ε _r	Dev. (%)	σ	Dev. (%)	Liquid Temp.	Test Data	
900B	850	55.00	1.05	55.57	1.03	1.06	0.95	21.6	02/25/2019	
1750B	1750	53.40	1.49	53.17	-0.43	1.52	2.01	21.4	02/26/2019	
1900B	1900	53.30	1.52	53.28	-0.04	1.54	1.32	22.1	02/27/2019	
2450B	2450	52.70	1.95	51.89	-1.54	1.97	1.03	22.3	02/27/2019	



7. System Verification Procedures

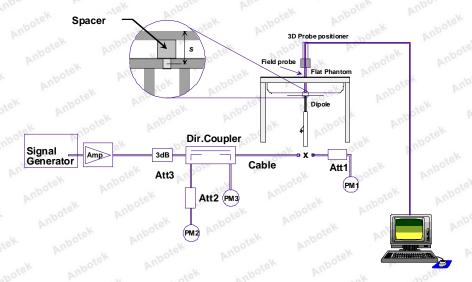
Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix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



System Setup for System Evaluation





Photo of Dipole Setup

> Validation Results

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

	Date	Frequency (MHz)	Liquid Type	Power fed onto reference dipole (mW)	Targeted SAR (W/kg)	Measured SAR (W/kg)	Normalized SAR (W/kg)	Deviation (%)
Ī	02/25/2019	850	Body	250	9.52	2.53	10.12	6.30
	02/26/2019	1750	Body	250	36.70	9.06	36.24	-1.25
	02/27/2019	1900	Body	250	39.60	9.26	37.04	-6.46
ſ	02/27/2019	2450	Body	250	51.10	12.10	48.40	-5.28

Target and Measurement SAR after Normalized

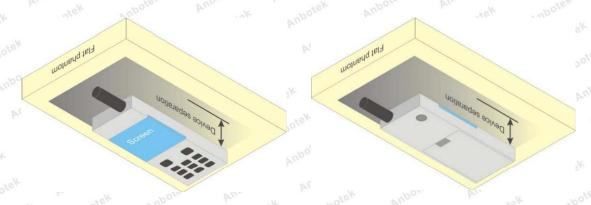


8. EUT Testing Position

8.1. Body Worn Position

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positionedagainst a flat phantom in a normal use configuration. Per KDB 648474 D04, body-worn accessoryexposure is typically related to voice mode operations when handsets are carried in body-worn accessories. Thebody-worn accessory procedures in FCC KDB 447498 D01 should be used to test for body-worn accessory SARcompliance, without a headset connected to it. This enables the test results for such configuration to be compatible withthat required for hotspot mode when the body-worn accessory test separation distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for body-worn accessory, measured without aheadset connected to the handset is < 1.2 W/kg, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a handset attached to the handset.

Accessories for body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components and those that do contain metallic components are supplied with the device, the device is tested with onlythe accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are test with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-chip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.



Body Worn Position



9. Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the middle channel.
- (b) Keep EUT to radiate maximum output power or 100% duty factor (if applicable)
- (c) Measure output power through RF cable and power meter.
- (d) Place the EUT in the positions as setup photos demonstrates.
- (e) Set scan area, grid size and other setting on the DASY software.
- (f) Measure SAR transmitting at the middle channel for all applicable exposure positions.
- (g) Identify the exposure position and device configuration resulting the highest SAR
- (h) Measure SAR at the lowest and highest channels atthe worst exposure position and device configuration if applicable.

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

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

9.1. Spatial Peak SAR Evaluation

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

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

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

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



9.2. Power Reference Measurement

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

9.3. Area Scan Procedures

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

Area scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

		187
	≤3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
יס יס	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	$3 - 4 \text{ GHz:} \le 12 \text{ mm}$ $4 - 6 \text{ GHz:} \le 10 \text{ mm}$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	When the x or y dimension of measurement plane orientation the measurement resolution measurement of the test demeasurement point on the test	n, is smaller than the above, nust be ≤ the corresponding evice with at least one



9.4. Zoom Scan Procedures

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

Zoom scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

A A A A A A A A A A A A A A A A A A A		V. V.	707		
Arr	3/4	100° A'	≤ 3 GHz	> 3 GHz	
Maximum zoom scan s	spatial reso	lution: Δx_{Zoom} , Δy_{Zoom}	\leq 2 GHz: \leq 8 mm 2 – 3 GHz: \leq 5 mm [*]	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: < 4 mm*	
	uniform	grid: Δz _{Zoom} (n)	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
Maximum zoom scan spatial resolution, normal to phantom surface	graded	Δz _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm	
	grid 4	Δz _{Zoom} (n>1): between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$		
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	

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

When zoom scan is required and the <u>reported</u> SAR from the <u>area scan based 1-g SAR estimation</u> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 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.



9.5. Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregateSAR, 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.

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



10. Conducted Power

<GSM Conducted power>

Band GSM850	Burst A	verage Powe	er (dBm)	Frame-A	verage Pow	er (dBm)
TX Channel	128	190	251	128	190	251
Frequency (MHz)	824.2	836.6	848.6	824.2	836.6	848.6
GSM (GMSK, 1 Tx slot)	, P.,	tek / Na	jotek / Ar	1/4	-polek	Anbyte
GPRS (GMSK, 1 Tx slot) – CS1	31.90	31.33	31.49	22.87	22.3	22.46
GPRS (GMSK, 2 Tx slots) – CS1	30.58	30.04	30.17	24.56	24.02	24.15
GPRS (GMSK, 3 Tx slots) – CS1	29.37	29.74	30.00	25.11	25.48	25.74
GPRS (GMSK, 4 Tx slots) – CS1	29.17	29.50	29.71	26.16	26.49	26.7
EDGE (8PSK, 1 Tx slot) – MCS5	27.23	27.31	27.30	18.20	18.28	18.27
EDGE (8PSK, 2 Tx slots) – MCS5	26.38	26.95	26.85	20.36	20.93	20.83
EDGE (8PSK, 3 Tx slots) – MCS5	25.69	26.15	26.03	21.43	21.89	21.77
EDGE (8PSK, 4 Tx slots) – MCS5	25.31	25.86	25.48	22.30	22.85	22.47
Band GSM1900	Burst A	verage Powe	er (dBm)	Frame-A	verage Pow	er (dBm)
TX Channel	512	661	810	512	661	810
Frequency (MHz)	1850.2	1880.0	1909.8	1850.2	1880.0	1909.8
GSM (GMSK, 1 Tx slot)	7	ek / nnb	oten / Ani	1	hotel	Anbole
GPRS (GMSK, 1 Tx slot) – CS1	30.36	30.11	30.11	21.33	21.08	21.08
GPRS (GMSK, 2 Tx slots) – CS1	29.95	29.66	29.72	23.93	23.64	23.7
GPRS (GMSK, 3 Tx slots) – CS1	29.79	29.55	29.54	25.53	25.29	25.28
GPRS (GMSK, 4 Tx slots) – CS1	29.60	29.36	29.51	26.59	26.35	26.5
EDGE (8PSK, 1 Tx slot) – MCS5	26.12	26.09	26.23	17.09	17.06	17.2
EDGE (8PSK, 2 Tx slots) – MCS5	25.89	25.67	25.79	19.87	19.65	19.77
EDGE (8PSK, 3 Tx slots) – MCS5	25.36	25.48	25.56	21.1	21.22	21.3
EDGE (8PSK, 4 Tx slots) – MCS5	25.32	25.16	25.14	22.31	22.15	22.13

Remark: The frame-averaged power is linearly scaled the maximum burst averaged power over 8 time slots.

The calculated method are shown as below:

Frame-averaged power = Maximum burst averaged power (1 Tx Slot) - 9.03 dB

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

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

Frame-averaged power = Maximum burst averaged power (4 Tx Slots) - 3.01 dB

Note:

- Per KDB 447498 D01, the maximum output power channel is used for SAR testing and for further SAR test reduction
- For Head SAR testing, GSM should be evaluated, therefore the EUT was set in GSM Voice for GSM850and GSM1900.
- For Hotspot mode SAR testing, GPRS and EDGE should be evaluated, therefore the EUT was set in GPRS 4 Tx slots for GSM850and GSM1900 due to its highest frame-average power.



<WCDMA Conducted Power>

The following tests were conducted according to the test requirements outlines in 3GPP TS 34.121 specification. A summary of these settings are illustrated below:

HSDPA Setup Configuration:

- a. The EUT was connected to Base Station Agilent E5515C referred to the Setup Configuration
- b. The RF path losses were compensated into the measurements.
- c. A call was established between EUT and Base Station with following setting:
 - i. Set Gain Factors (β_c and β_d) and parameters were set according to each
 - ii. Specific sub-test in the following table, C10.1.4, quoted from the TS 34.121
 - iii. Set RMC 12.2Kbps + HSDPA mode.
 - iv. Set Cell Power = -86 dBm
 - v. Set HS-DSCH Configuration Type to FRC (H-set 1, QPSK)
 - vi. Select HSDPA Uplink Parameters
 - vii. Set Delta ACK, Delta NACK and Delta CQI = 8
 - viii. Set Ack-Nack Repetition Factor to 3
 - ix. Set CQI Feedback Cycle (k) to 4 ms
 - x. Set CQI Repetition Factor to 2
 - xi. Power Ctrl Mode = All Up bits
- d. The transmitted maximum output power was recorded.

Table C.10.1.4: β values for transmitter characteristics tests with HS-DPCCH

Ī	Sub-test	β _c	βd	β _d (SF)	β₀/βd	βнs (Note1.	CM (dB) (Note 3)	MPR (dB) (Note 3)
				(0/)		Note 2)	(.1010 0)	(
I	1	2/15	15/15	64	2/15	4/15	0.0	0.0
I	2	12/15	15/15	64	12/15	24/15	1.0	0.0
		(Note 4)	(Note 4)		(Note 4)			
I	3	15/15	8/15	64	15/8	30/15	1.5	0.5
Ι	4	15/15	4/15	64	15/4	30/15	1.5	0.5

Note 1: \triangle_{ACK} , \triangle_{NACK} and $\triangle_{CQI} = 30/15$ with $\beta_{hs} = 30/15 * \beta_c$.

Note 2: For the HS-DPCCH power mask requirement test in clause 5.2C, 5.7A, and the Error Vector Magnitude (EVM) with HS-DPCCH test in clause 5.13.1A, and HSDPA EVM with phase discontinuity in clause 5.13.1AA, \triangle ACK and \triangle NACK = 30/15 with β_{hs} = 30/15 * β_c , and \triangle CQI = 24/15 with β_{hs} = 24/15 * β_c .

Note 3: CM = 1 for β_o/β_d =12/15, β_{hs}/β_c =24/15. For all other combinations of DPDCH, DPCCH and HSDPCCH the MPR is based on the relative CM difference. This is applicable for only UEs that support HSDPA in release 6 and later releases.

Note 4: For subtest 2 the β_c/β_d ratio of 12/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to β_c = 11/15 and β_d = 15/15.

Setup Configuration



HSUPA Setup Configuration:

- a. The EUT was connected to Base Station Agilent E5515C referred to the Setup Configuration.
- b. The RF path losses were compensated into the measurements.
- c. A call was established between EUT and Base Station with following setting *:
 - i. Call Configs = 5.2B, 5.9B, 5.10B, and 5.13.2B with QPSK
 - ii. Set the Gain Factors (β_c and β_d) and parameters (AG Index) were set according to each specific sub-test in the following table, C11.1.3, quoted from the TS 34.121
 - iii. Set Cell Power = -86 dBm
 - iv. Set Channel Type = 12.2k + HSPA
 - v. Set UE Target Power
 - vi. Power Ctrl Mode= Alternating bits
 - vii. Set and observe the E-TFCI
 - viii. Confirm that E-TFCI is equal to the target E-TFCI of 75 for sub-test 1, and other subtest's E-TFCI
- d. The transmitted maximum output power was recorded.

Table C.11.1.3: β values for transmitter characteristics tests with HS-DPCCH and E-DCH

Ŋ	Sub- test	βς	βa	β _d (SF)	βε/βα	βнs (Note1)	βес	β _{ed} (Note 5) (Note 6)	β _{ed} (SF)	β _{ed} (Codes)	CM (dB) (Note 2)	MPR (dB) (Note 2)	AG Index (Note 6)	E- TFCI
S	1	11/15 (Note 3)	15/15 (Note 3)	64	11/15 (Note 3)	22/15	209/2 25	1309/225	4	1	1.0	0.0	20	75
	2	6/15	15/15	64	6/15	12/15	12/15	94/75	4	1	3.0	2.0	12	67
1	3	15/15	9/15	64	15/9	30/15	30/15	β _{ed} 1: 47/15 β _{ed} 2: 47/15	4	2	2.0	1.0	15	92
	4	2/15	15/15	64	2/15	4/15	2/15	56/75	4	1	3.0	2.0	17	71
	5	15/15 (Note 4)	15/15 (Note 4)	64	15/15 (Note 4)	30/15	24/15	134/15	4	1	1.0	0.0	21	81

Note 1: Δ_{ACK} , Δ_{NACK} and Δ_{CQI} = 30/15 with β_{hs} = 30/15 * β_c .

Note 2: CM = 1 for β_c/β_d =12/15, β_{ns}/β_c =24/15. For all other combinations of DPDCH, DPCCH, HS- DPCCH, E-DPDCH and E-DPCCH the MPR is based on the relative CM difference.

Note 3: For subtest 1 the β_c/β_d ratio of 11/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to β_c = 10/15 and β_d = 15/15.

Note 4: For subtest 5 the β_c/β_d ratio of 15/15 for the TFC during the measurement period (TF1, TF0) is achieved by setting the signalled gain factors for the reference TFC (TF1, TF1) to β_c = 14/15 and β_d = 15/15.

Note 5: In case of testing by UE using E-DPDCH Physical Layer category 1, Sub-test 3 is omitted according to TS25.306 Table 5.1g.

Note 6: β_{ed} can not be set directly, it is set by Absolute Grant Value

Setup Configuration



<WCDMA Conducted Power>

Band		WCDMA I	I		WCDMA V	
TX Channel	9262	9400	9538	4132	4183	4233
Frequency (MHz)	1852.4	1880.0	1907.6	826.4	836.6	846.6
AMR 12.2Kbps	23.38	22.92	23.30	23.52	23.23	23.94
RMC 12.2Kbps	23.59	23.49	23.47	23.8	23.74	24.14
HSDPA Subtest-1	23.25	23.35	23.41	23.74	23.43	23.93
HSDPA Subtest-2	22.98	23.16	22.82	23.34	23.17	23.8
HSDPA Subtest-3	22.88	22.82	22.23	22.9	23.17	23.78
HSDPA Subtest-4	22.34	22.16	22.06	22.9	22.83	23.28
HSUPA Subtest-1	22.68	22.67	22.59	22.58	22.63	22.99
HSUPA Subtest-2	22.67	22.53	22.2	22.34	21.87	22.42
HSUPA Subtest-3	22.36	22.27	22.08	22.12	21.61	22.35
HSUPA Subtest-4	21.65	22.04	21.81	21.52	21.51	22
HSUPA Subtest-5	21.35	21.33	21.11	23.74	23.43	23.93

General Note

- Per KDB 941225 D01 v02, RMC 12.2kbps setting is used to evaluate SAR. If AMR 12.2kbps power is < 0.25dB higher than RMC 12.2kbps, SAR tests with AMR 12.2kbps can be excluded.
- 2. By design, AMR and HSDPA/HSUPA RF power will not be larger than RMC 12.2kbps, detailed information is included in Tune-up Procure exhibit.
- 3. It is expected by the manufacturer that MPR for some HSDPA/HSUPA subtests may differ from the specification of 3GPP, according to the chipset implementation in this model. The implementation and expected deviation are detailed in tune-up procedure exhibit.



<WIFI 2.4GHz Conducted Power>

Mode	Channel	Frequency (MHz)	Conducted Output Power(dBm)	Test Rate Data
	Anbote 1 An	2412	12.70	1 Mbps
802.11b	6.0h	2437	12.09	1 Mbps
	k 11 otek	2462	12.34	1 Mbps
	1 hotek	2412	11.92	6 Mbps
802.11g	6	2437	11.40	6 Mbps
	Anboter 11 Anb	2462	11.69	6 Mbps
S	Anbotek Ani	2412	11.55	MCS0
802.11n(20MHz)	6	2437	11.28	MCS0
	x 11 otek	2462	11.33	MCS0

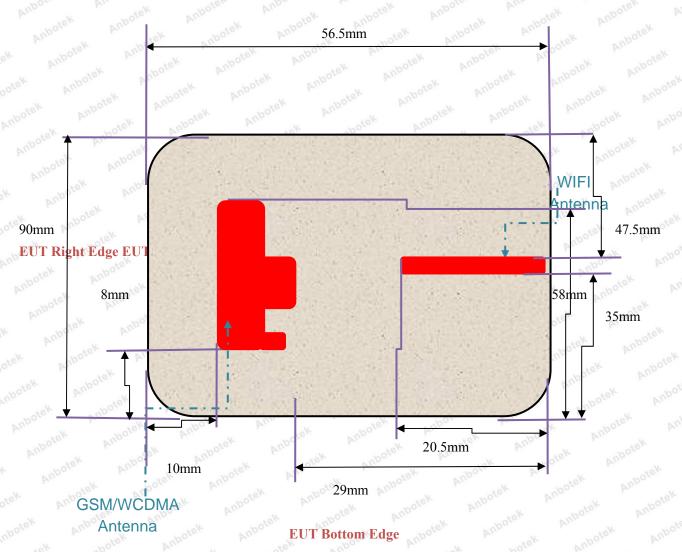
Note:

- 1. WIFl power was test and only Maximum Power was provide here.
- 2 SAR Test Exclusion Threshold for WIFI is about 9.6mW, the maximum tune up power of WIFI is 13dBm=19.95mW. WIFI stand-alone SAR is required.



11. Antenna Location





EUT BACK VIEW

Distance of The Antenna to the EUT surface and edge										
Antennas	Front	Back	Top Side	Bottom Side	Left Side	Right Side				
WIFI	sk / Anbor	/ P	47.5mm	35mm	1mm	36mm				
GSM, WCMDA	otek / Anb	Ans / Ans	32mm	8mm	29mm	10mm				



12.SAR Test Results Summary

General Note:

1. Per KDB 447498 D01v05r01, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.

Scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.

Reported SAR(W/kg) = Measured SAR(W/kg) * Scaling Factor

2. Per KDB 447498 D01v05r01, for each exposure position, if the highest output channel reported SAR≤0.8W/kg other channels SAR testing are not necessary

12.1. Body SAR Results

<GSM>

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz)	Power	Tune-Up Limit (dBm)	Scaling Factor	Power Drift (dB)	Measured SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
Born	GSM850	GPRS(4 Tx slots)	Front	1	251	848.6	29.71°	30.00	1.01	0.08	0.431	0.435
#1	GSM850	GPRS(4 Tx slots)	Back	1	251	848.6	29.71	30.00	1.01	0.02	0.621	0.627
20/	GSM850	GPRS(4 Tx slots)	Left Side	up of e	251	848.6	N/A	N/A	N/A	N/A	N/A	N/A
	GSM850	GPRS(4 Tx slots)	Right Side	Albot	251	848.6	29.71	30.00	1.01	-0.03	0.254	0.257
N.	GSM850	GPRS(4 Tx slots)	Top Side	1	251	848.6	N/A	N/A	N/A	N/A	N/A	N/A
otek	GSM850	GPRS(4 Tx slots)	Bottom Side	1	251	848.6	29.71	30.00	1.01	0.01	0.316	0.319
nbote	GSM1900	GPRS(4 Tx slots)	Front	1	512	1850.2	29.60	30.00	1.01	0.03	0.166	0.168
#2	GSM1900	GPRS(4 Tx slots)	Back	bolek	512	1850.2	29.60	30.00	1.01	0.05	0.350	0.354
be.	GSM1900	GPRS(4 Tx slots)	Left Side	Lot	512	1850.2	N/A	N/A	N/A	N/A	N/A	N/A
	GSM1900	GPRS(4 Tx slots)	Right Side	1	512	1850.2	29.60	30.00	1.01	-0.04	0.173	0.175
Str	GSM1900	GPRS(4 Tx slots)	Top Side	1^{p_n}	512	1850.2	N/A	N/A	N/A	N/A	N/A	N/A
otek -bote	GSM1900	GPRS(4 Tx slots)	Bottom Side	_{ce} ×1	512	1850.2	29.60	30.00	1.01	0.06	0.215	0.217

<WCDMA>

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq.	Power	Tune-Up Limit (dBm)	Scaling Factor	Drift	Measured SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
otel	WCDMA Band II	RMC 12.2K	Front	e* 1	9262	1852.4	23.59	24	1.02	0.07	0.108	0.110
#3	WCDMA Band II	RMC 12.2K	Back	J.	9262	1852.4	23.59	24	1.02	-0.04	0.159	0.162
Anb	WCDMA Band II	RMC 12.2K	Left Side	1	9262	1852.4	N/A	N/A	N/A	N/A	N/A	N/A
P	WCDMA Band II	RMC 12.2K	Right Side	AUBO.	9262	1852.4	23.59	24	1.02	0.03	0.113	0.115
6	WCDMA Band II	RMC 12.2K	Top Side	Tup,	9262	1852.4	N/A	N/A	N/A	N/A	N/A	N/A
lek Lek	WCDMA Band II	RMC 12.2K	Bottom Side	1 P	9262	1852.4	23.59	24	1.02	0.02	0.121	0.123



	No.	O. Dr.			18	- 43			3.6	017	0111	177
	WCDMA Band V	RMC 12.2K	Front	Anb.	4132	826.4	23.80	24	1.01	0.11	0.206	0.208
#4	WCDMA Band V	RMC 12.2K	Back	1	4132	826.4	23.80	24	1.01	-0.06	0.380	0.384
ie ^K	WCDMA Band V	RMC 12.2K	Left Side	× 1	4132	826.4	N/A	N/A	N/A	N/A	N/A	N/A
00	WCDMA Band V	RMC 12.2K	Right Side	lel.	4132	826.4	23.80	24	1.01	0.08	0.183	0.185
Anbo	WCDMA Band V	RMC 12.2K	Top Side	1	4132	826.4	N/A	N/A	N/A	N/A	N/A	N/A
A	WCDMA Band V	RMC 12.2K	Bottom Side	Anbot Anbot	4132	826.4	23.80	24	1.01	-0.03	0.252	0.255

<WIFI 2.4GHz>

Plot No.	Band	Mode	Test Position	Gap (cm)	Ch.	Freq. (MHz	Average Power (dBm)	Tune-Up Limit (dBm)	Scaling Factor	Driit	Measured SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
Am	WIFI2.4GHz	802.11b	Front	1	No.	2412	12.70	13.00	1.02	0.06	0.324	0.330
#7	WIFI2.4GHz	802.11b	Back	Tro	lek	2412	12.70	13.00	1.02	-0.07	0.406	0.414
O. K.	WIFI2.4GHz	802.11b	Left Side	1 🕅	1	2412	12.70	13.00	1.02	0.05	0.311	0.317
notek	WIFI2.4GHz	802.11b	Right Side	1	Mpo	2412	N/A	N/A	N/A	N/A	N/A	N/A
1000	WIFI2.4GHz	802.11b	Top Side	otel	$1_{\mathbb{N}^7}$	2412	N/A	N/A	N/A	N/A	N/A	N/A
YUN	WIFI2.4GHz	802.11b	Bottom Side	1,tek	1	2412	N/A	N/A	N/A	N/A	N/A	N/A



13. Simultaneous Transmission Analysis

13.1. Simultaneous TX SAR Considerations

No.	Applicable Simultaneous Tra	nsmission		
ich.	GSM+WIFI 2.4GHz	Anbote	Ano	nbotek
2.	WCDMA+WIFI2.4GHz	Anbotek	Aupo	k abotek

Note:

1. WIFI 2.4GHz and Bluetoothshare the same antenna, and can not transmit simultaneously.

13.2. Evaluation of Simultaneous SAR

<GSM>

Test Position	WiFi SAR _{1-g} (W/Kg)	GSM 850 _{1-g} (W/Kg)	PCS 1900 _{1-g} (W/Kg)	MAX. ΣSAR _{1-g} (W/Kg)	SAR _{1-g} Limit (W/Kg)	Simut. Meas. Required
Front	0.330	0.435	0.168	0.765	1.6	N/A
Back	0.414	0.627	0.354	1.041	1.6	N/A
Left Side	0.317	N/A	N/A	0.317	1.6 Am	N/A
Right Side	N/A	0.257	0.175	0.257	1.6	N/A
Top side	N/A	N/A	N/A	N/A	1.6	N/A
Bottom Side	N/A	0.319	0.217	0.319	1.6 notek	N/A

<WCDMA>

Test Position	WiFi SAR _{1-g} (W/Kg)	WCDMA Band 2 1-g (W/Kg)	WCDMA Band 5 1-g (W/Kg)	MAX. ΣSAR _{1-g} (W/Kg)	SAR _{1-g} Limit (W/Kg)	Simut. Meas. Required
Front	0.330	0.110	0.208	0.538	1.6	N/A
Back	0.414	0.162	0.384	0.798	1.6	N/A
Left Side	0.317	N/A	N/A	0.317	1.6	N/A
Right Side	N/A	0.115	0.185	0.185	1.6	N/A
Top side	N/A	N/A	N/A	N/A	1.6	N/A
Bottom Side	N/A	0.123	0.255	0.255	1.6	N/A



14. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a fr equency band is< 1.5 W/Kg, the extensive SAR measurement uncertainty analysis described in IEC 62209-2:2010 is not required in SAR reports submitted for equipment approval.



Appendix A. EUT Photos and Test Setup Photos



Body Front(10mm)

Body Back(10mm)



Bottom (10mm)



Left(10mm)

Right(10mm)



Appendix B. Plots of SAR System Check

Date: 02/25/2019

835MHz Body System Check

DUT: Dipole 835 MHz; Type: D835V2; Serial: D835V2 - SN:4d160

Communication System: UID 0, CW; Frequency: 835 MHz; Duty Cycle: 1:1 Medium parameters used: f = 835 MHz; $\sigma = 1.06$ S/m; $\varepsilon_r = 55.57$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5Configuration:

• Probe: EX3DV4 – SN7396; ConvF(9.88, 9.88, 9.88); Calibrated: 12.5.2018;

• Sensor-Surface: 2mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn387; Calibrated: 6.9.2018

Phantom: SAM1; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

Configuration/Pin=250mW/Area Scan (7x7x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 2.97 W/kg

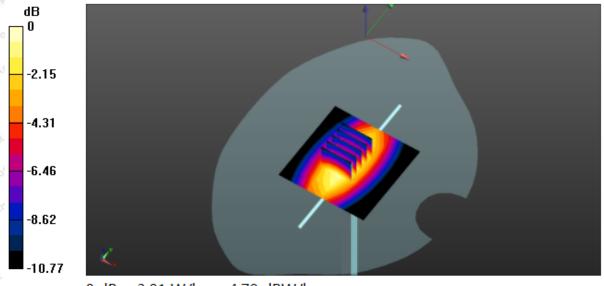
Configuration/Pin=250mW/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 60.007 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 4.02 W/kg

SAR(1 g) = 2.53 W/kg; SAR(10 g) = 1.75 W/kg

Maximum value of SAR (measured) = 3.58 W/kg



0 dB = 3.01 W/kg = 4.79 dBW/kg



Date: 02/26/2019

1750MHz Body System Check

DUT: Dipole 1750 MHz; Type: D1750V2; Serial: D1750V2 - SN:1021

Communication System: UID 0, CW; Frequency: 1750 MHz; Duty Cycle: 1:1

Medium parameters used: f = 1750 MHz; $\sigma = 1.522$ S/m; $\varepsilon_r = 53.173$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 SN7396; ConvF(8.24, 8.24, 8.24); Calibrated: 12.5.2018;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn387; Calibrated: 6.9.2018
- Phantom: SAM; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

Configuration/Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm Maximum value of SAR (interpolated) = 10.9 W/kg

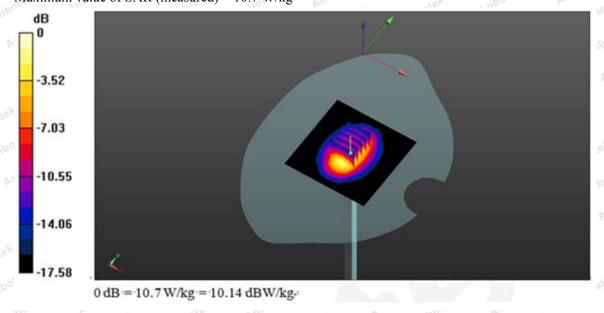
Configuration/Pin=250mW/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 87.593 V/m; Power Drift = 0.08 dB

Peak SAR (extrapolated) = 17.9 W/kg

SAR(1 g) = 9.06 W/kg; SAR(10 g) = 4.75W/kg

Maximum value of SAR (measured) = 10.7 W/kg





Date: 02/27/2019

1900MHz Body System Check

DUT: Dipole 1900 MHz; Type: D1900V2; Serial: D1900V2 - SN:5d179

Communication System: UID 0, CW; Frequency: 1900 MHz;Duty Cycle: 1:1 Medium parameters used: f = 1880 MHz; σ = 1.54 S/m; ϵ_r = 53.28; ρ = 1000 kg/m³

Phantom section: Flat Section

DASY5Configuration:

- Probe: EX3DV4 SN7396; ConvF(7.97, 7.97, 7.97); Calibrated: 12.5.2018;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn387; Calibrated: 6.9.2018
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

Configuration/Pin=250mW/Area Scan (7x7x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 10.7 W/kg

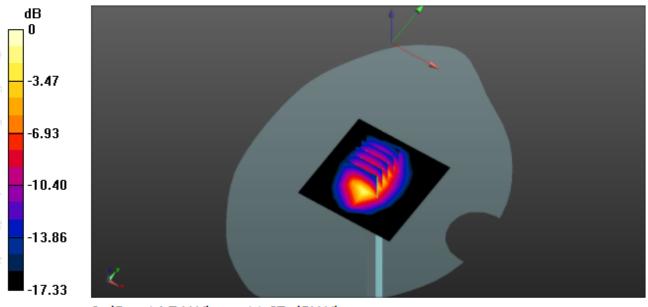
Configuration/Pin=250mW/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 86.92 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 17.0 W/kg

SAR(1 g) = 9.26 W/kg; SAR(10 g) = 4.84 W/kg

Maximum value of SAR (measured) = 10.4 W/kg



0 dB = 14.7 W/kg = 11.67 dBW/kg



Date: 02/27/2019

2450MHz Body System Check

Communication System: UID 0, CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: f = 2450 MHz; $\sigma = 1.836$ S/m; $\varepsilon_r = 38.968$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

• Probe: EX3DV4 – SN7396; ConvF(7.57, 7.57, 7.57); Calibrated: 12.5.2018;

• Sensor-Surface: 2mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn387; Calibrated: 6.9.2018

• Phantom: SAM; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

Configuration/Pin=250mW/Area Scan (81x81x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm Maximum value of SAR (interpolated) = 17.2 W/kg

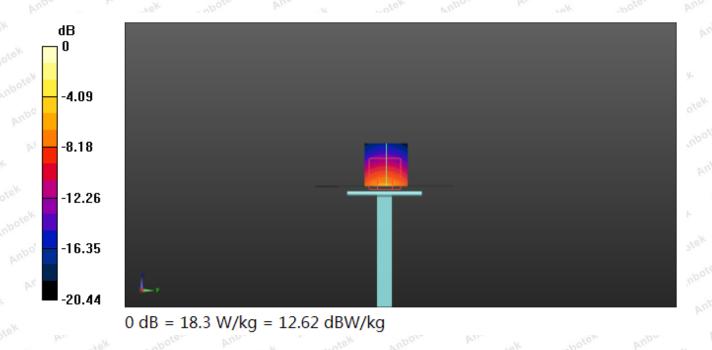
Configuration/Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 82.205 V/m; Power Drift = -0.01 dB

Peak SAR (extrapolated) = 24.5 W/kg

SAR(1 g) = 12.1 W/kg; SAR(10 g) = 5.68 W/kg

Maximum value of SAR (measured) = 18.3 W/kg





Appendix C. Plots of SAR Test Data

#1Date: 02/25/2019

GSM850_GPRS_4TX_Body Back_Ch251

Communication System: UID 0, GPRS(4 Tx slots) (0); Frequency: 848.6 MHz; Duty Cycle: 1:1.99986 Medium parameters used (interpolated): f = 848.6 MHz; σ = 0.96 S/m; ϵ_r = 55.858; ρ = 1000 kg/m³

DASY5 Configuration:

Phantom section: Flat Section

- Probe: EX3DV4 SN7396; ConvF(9.88, 9.88, 9.88); Calibrated: 12.5.2018;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn387; Calibrated: 6.9.2018
- Phantom: SAM; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

BODY/4ST-BACK/Area Scan (9x15x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) = 0.723 W/kg

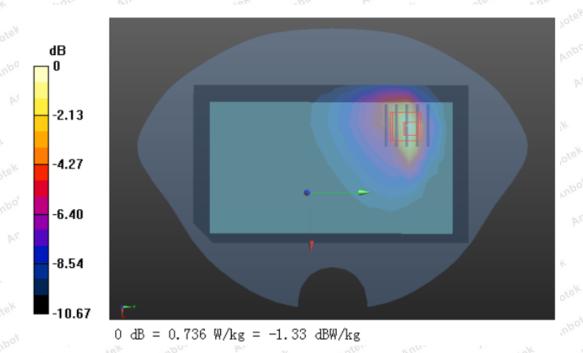
BODY/4ST-BACK/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 21.251 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 0.840 W/kg

SAR(1 g) = 0.621 W/kg; SAR(10 g) = 0.444 W/kg

Maximum value of SAR (measured) = 0.736 W/kg





#2Date: 02/27/2019

GSM1900 GPRS 4TX Body Back Ch512

Communication System: UID 0, GPRS(4 Tx slots) (0); Frequency: 1850.2 MHz; Duty Cycle: 1:1.99986

Medium parameters used: f = 1850.2 MHz; $\sigma = 1.57$ S/m; $\varepsilon_r = 51.14$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

Probe: EX3DV4 – SN7396; ConvF(7.97, 7.97, 7.97); Calibrated: 12.5.2018;

Sensor-Surface: 2mm (Mechanical Surface Detection)

Electronics: DAE4 Sn387; Calibrated: 6.9.2018

Phantom: SAM; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

BODY/4ST-BACK/Area Scan (9x15x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) =0.426 W/kg

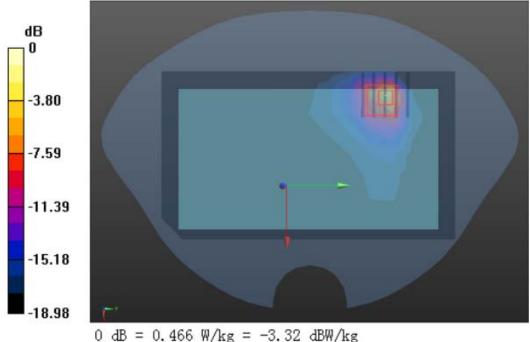
BODY/4ST-BACK/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 6.276 V/m; Power Drift = 0.05 dB

Peak SAR (extrapolated) = 0.602 W/kg

SAR(1 g) = 0.350 W/kg; SAR(10 g) = 0.200 W/kg

Maximum value of SAR (measured) = 0.466 W/kg





#3Date: 02/27/2019

WCDMA 1900 RMC 12.2K Body Back Ch9262

Communication System: UID 0, Generic WCDMA (0); Frequency: 1852.4 MHz; Duty Cycle: 1:1

Medium parameters used: f = 1852.4 MHz; $\sigma = 1.57$ S/m; $\varepsilon_r = 51.14$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

Probe: EX3DV4 – SN7396; ConvF(7.97, 7.97, 7.97); Calibrated: 12.5.2018;

Sensor-Surface: 2mm (Mechanical Surface Detection)

Electronics: DAE4 Sn387; Calibrated: 6.9.2018

Phantom: SAM; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

BODY/BACK/Area Scan (9x15x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) =0.183 W/kg

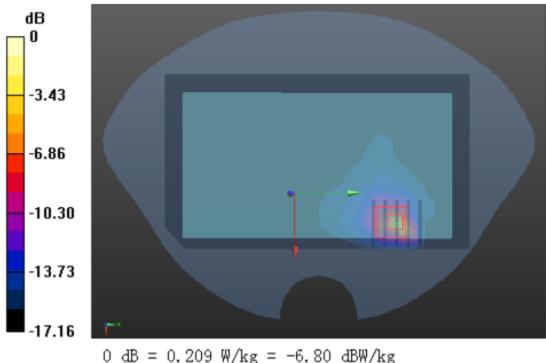
BODY/BACK/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 7.081 V/m; Power Drift = -0.04 dB

Peak SAR (extrapolated) = 0.258 W/kg

SAR(1 g) = 0.159 W/kg; SAR(10 g) = 0.093 W/kg

Maximum value of SAR (measured) = 0.209 W/kg





#4Date: 02/25/2019

WCDMA 850 RMC 12.2K Body Back Ch4132

Communication System: UID 0, Generic WCDMA (0); Frequency: 826.4 MHz; Duty Cycle: 1:1 Medium parameters used (interpolated): f = 826.4 MHz; $\sigma = 0.96$ S/m; $\varepsilon_r = 55.858$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

• Probe: EX3DV4 – SN7396; ConvF(9.88, 9.88, 9.88); Calibrated: 12.5.2018;

• Sensor-Surface: 2mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn387; Calibrated: 6.9.2018

• Phantom: SAM; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

BODY/BACK/Area Scan (9x15x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) =0.436 W/kg

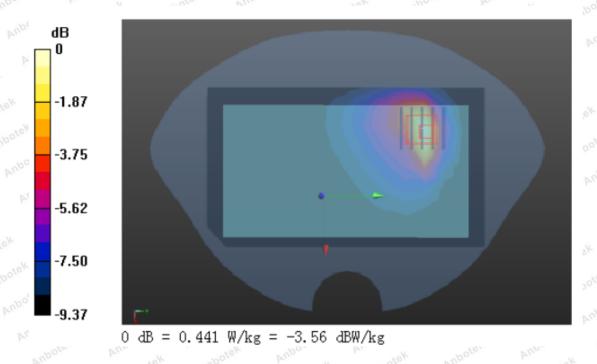
BODY/BACK/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 3.663 V/m; Power Drift = -0.06 dB

Peak SAR (extrapolated) = 0.479 W/kg

SAR(1 g) = 0.380 W/kg; SAR(10 g) = 0.280 W/kg

Maximum value of SAR (measured) = 0.441 W/kg





Date: 02/27/2019

WIFI 2.4G Body Back Ch1

Communication System: UID 0, wifi (fcc) (0); Frequency: 2412 MHz; Duty Cycle: 1:1

Medium parameters used (interpolated): f = 2412 MHz; $\sigma = 1.963$ S/m; $\epsilon r = 52.013$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

Probe: EX3DV4 - SN7396; ConvF(7.53, 7.53, 7.53); Calibrated: 12.5.2018;

Sensor-Surface: 2mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1303; Calibrated: 6.9.2018

Phantom: SAM; Type: QD000P40CD; Serial: TP:1670

Measurement SW: DASY52, Version 52.8 (2); SEMCAD X Version 14.6.10 (7164)

BODY/BACK/Area Scan (9x15x1): Measurement grid: dx=15mm, dy=15mm

Maximum value of SAR (measured) =0.484 W/kg

BODY/BACK/Zoom Scan (5x5x7)/Cube 0: Measurement grid: dx=8mm, dy=8mm, dz=5mm

Reference Value = 19.134 V/m; Power Drift = -0.07 dB

Peak SAR (extrapolated) = 0.522 W/kg

SAR(1 g) = 0.406 W/kg; SAR(10 g) = 0.305 W/kg

Maximum value of SAR (measured) = 0.479 W/kg

