



TEST REPORT

APPLICANT : Shenzhen Jimi IoT Co., Ltd.
PRODUCT NAME : Smart 4G Employee ID Card
MODEL NAME : PL200
BRAND NAME : JimiIoT
FCC ID : 2AMLF-PL200
STANDARD(S) : FCC 47 CFR Part 2(2.1093)
IEEE 1528-2013
RECEIPT DATE : 2023-09-27
TEST DATE : 2023-11-02 to 2023-11-06
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Changed History		
Version	Date	Reason for Change
1.0	2023-11-20	First edition



1. SAR Results Summary

The maximum results of Specific Absorption Rate (SAR) found during test as bellows:

<Highest Reported SAR Summary>

Frequency Band		Highest SAR Summary	
		Body (Gap 10mm)	
		1g SAR (W/kg)	
GSM	GSM850	0.225	
	GSM1900	0.632	
LTE	LTE Band 2	0.650	
	LTE Band 4	0.420	
	LTE Band 5	0.259	
	LTE Band 7	0.577	
2.4GHz Band	Bluetooth	N/A	

Highest Simultaneous Transmission SAR _{1g} (W/Kg):	0.699 W/kg	Limit(W/kg): 1.6 W/kg
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Note:

1. This device is in compliance with Specific Absorption Rate (SAR) for general population or uncontrolled exposure limits (1.6W/kg as averaged over any 1 gram of tissue; specified in FCC 47 CFR part 1 (1.1310) and ANSI/IEEE C95.1-1992), and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.
2. When the test result is a critical value, we will use the measurement uncertainty give the judgment result based on the 95% confidence intervals.



2. Technical Information

Note: Provide by applicant.

2.1. Applicant and Manufacturer Information

Applicant:	Shenzhen Jimi IoT Co., Ltd.
Applicant Address:	3-4/F, Block A, Building #7, Shenzhen International Innovation Valley, Dashi 1st Road, Nanshan District, Shenzhen, Guangdong, China
Manufacturer:	Shenzhen Jimi IoT Co., Ltd.
Manufacturer Address:	3-4/F, Block A, Building #7, Shenzhen International Innovation Valley, Dashi 1st Road, Nanshan District, Shenzhen, Guangdong, China

2.2. Equipment under Test (EUT) Description

Product Name:	Smart 4G Employee ID Card
EUT IMEI:	868120309999412(E)
Hardware Version:	PL200_MB_V1.0
Software Version:	PL200_PL200_AAHB_ENGLISH_V1.1.0_231110.1900
Frequency Bands:	GSM 850: 824 MHz ~ 849 MHz GSM 1900: 1850 MHz ~ 1910 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Modulation Mode:	GSM/GPRS: GMSK EDGE: 8PSK LTE: QPSK, 16QAM BR+EDR: GFSK(1Mbps), $\pi/4$ -DQPSK(2Mbps), 8-DPSK(3Mbps) Bluetooth LE: GFSK(1Mbps, 2Mbps)
Multi-slot Class:	GPRS: Multi-slot Class 12 EDGE: Multi-slot Class 12
Operation Class:	Class B
Hotspot Mode:	Support
Antenna Type:	WWAN: PIFA Internal Bluetooth: PIFA Antenna
SIM Cards Description:	GSM+LTE



Note: For more detailed description, please refer to specification or user manual supplied by the applicant and/or manufacturer.

2.3. Environment of Test Site/Conditions

Normal Temperature (NT):	20-25 °C
Relative Humidity:	30-75 %
Air Pressure:	980-1020 hPa

Test Frequency:	GSM 850MHz/1900MHz FDD-LTE Band 2/4/5/7
Operation Mode:	Call established
Power Level:	GSM 850 MHz Maximum output power(level 5) GSM 1900MHz Maximum output power(level 0) FDD-LTE Band 2/4/5/7 (Maximum output power)

During SAR test, EUT is in Traffic Mode (Channel Allocated) at Normal Voltage Condition. A communication link is set up with a System Simulator (SS) by air link, and a call is established.

The EUT shall use its internal transmitter. The antenna(s), battery and accessories shall be those specified by the Factory. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power output. If a wireless link is used, the antenna connected to the output of the base station simulator shall be placed at least 50 cm away from the handset.

The signal transmitted by the simulator to the antenna feeding point shall be lower than the output power level of the handset by at least 35 dB.

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 or controlled and general population or uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational or controlled exposure limits are Middle than the limits for general population or 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:

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

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

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

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

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

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

Where σ is the conductivity of the tissue, ρ is the mass density of the tissue and $|E|$ is the rmselectrical field strength.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.



4. RF Exposure Limits

4.1. Uncontrolled Environment

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

4.2. Controlled Environment

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

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

Type Exposure	Uncontrolled Environment Limit
Spatial Peak SAR (1g cube tissue for head and trunk)	1.6 W/kg
Spatial Peak SAR (10g cube tissue for limbs)	4.0 W/kg
Spatial Peak SAR (1g cube tissue for whole body)	0.08 W/kg

Note:

- Occupational/Uncontrolled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).
- Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.



5. Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Method Determination /Remark
FCC 47 CFR Part 2(2.1093)	Radio Frequency Radiation Exposure Evaluation: Portable Devices	No deviation
IEEE 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques	No deviation
KDB 447498 D01v06	General RF Exposure Guidance	No deviation
KDB 248227 D01v02r02	SAR Measurement Procedures for 802.11 Transmitters	No deviation
KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz	No deviation
KDB 865664 D02v01r02	RF Exposure Reporting	No deviation
KDB 648474 D04v01r03	Handset SAR	No deviation
KDB 941225 D01v03r01	3G SAR MEAUREMENT PROCEDURES	No deviation
KDB 941225 D05v02r05	SAR Evaluation Consideration for LTE Devices	No deviation
KDB 941225 D06v02r01	SAR Evaluation Procedures For Portable Devices With Wireless Router Capabilities	No deviation
Note 1: Additions to, deviation, or exclusions from the method shall be judged in the "method determination" column of add, deviate or exclude from the specific method shall be explained in the "Remark" of the above table.		

6. SAR Measurement System

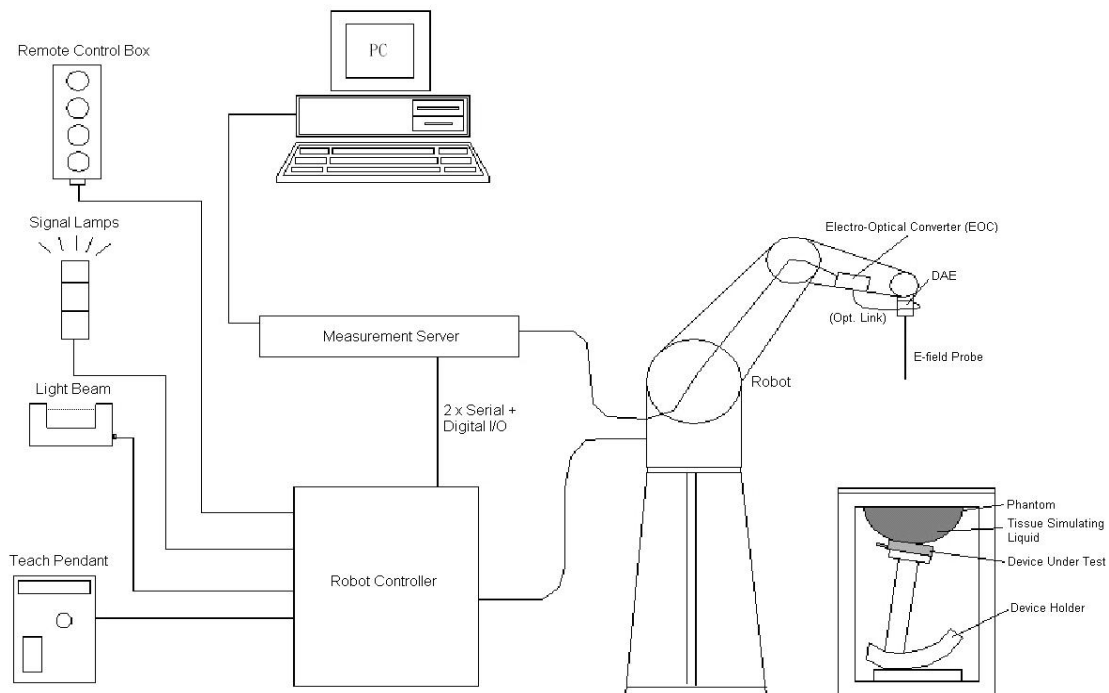


Fig 6.1 SPEAG DASY System Configurations

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 (ECO) 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.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom.
- A device holder.
- Tissue simulating liquid.
- Dipole for evaluating the proper functioning of the system.
- Some of the components are described in details in the following sub-sections.

6.1. 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

<ES3DV3 Probe>


Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection system. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz to 3 GHz; Linearity: ± 0.2 dB	
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.4 dB in HSL (rotation normal to probe axis)	
Dynamic Range	5 μ W/g to 100 mW/g; Linearity: ± 0.2 dB	
Dimensions	Overall length: 330 mm (Tip: 16 mm) Tip diameter: 6.8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.7 mm	

Fig 6.2 Photo of ES3DV3

<EX3DV4 Probe>

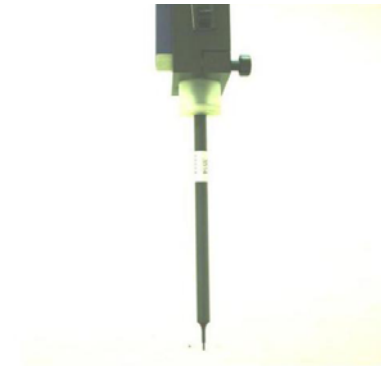
Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB	
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	10 μ W/g to 100 mW/g; Linearity: ± 0.2 dB	
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	

Fig 6.3 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 ± 0.25 dB. 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.

6.2. 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. 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 200M Ω ; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

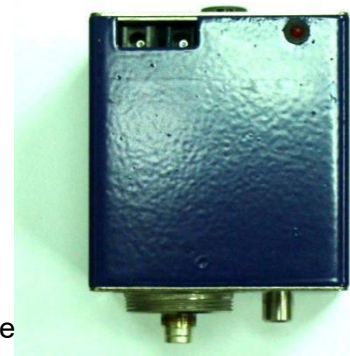


Fig 6.4 Photo of DAE

6.3. Robot

The SPEAG DASY system uses the high precision robots (DASY4: RX90BL; DASY5: TX90XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY4: CS7MB; DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

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)



Fig 6.5 Photo of DASY5

6.4. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY4: 166 MHz, Intel Pentium; DASY5: 400 MHz, Intel Celeron), chip disk (DASY4: 32 MB; DASY5: 128 MB), RAM (DASY4: 64 MB, DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board. The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.



Fig 6.6 Photo of Server for DASY5

6.5. Light Beam Unit

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

The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.



Fig. 6.7 Photo of Light Beam

6.6. Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%) 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 Head, Right Head, Flat Phantom



Fig. 6.8 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.

6.7. Device Holder

<Device Holder for SAM Twin Phantom>

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ± 0.5 mm would produce a SAR uncertainty of ± 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 (EPR). 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 $\epsilon = 3$ 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.

<Laptop Extension Kit>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Fig 6.9 Device Holder

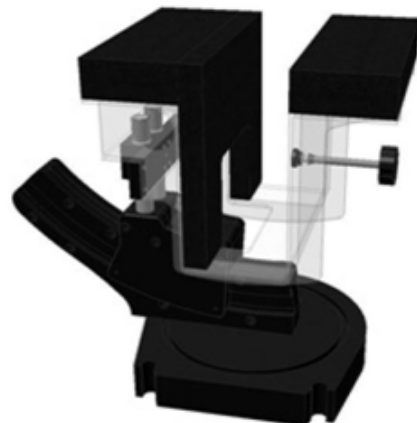


Fig 6.10 Laptop Extension Kit



6.8. Data Storage and Evaluation

➤ Data Storage

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The post-processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows 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	$dcpi$
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:

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

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:

$$\text{E-field Probes: } E_i = \sqrt{\frac{V_i}{\text{Norm}_i \times \text{ConvF}}}$$

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

With V_i = compensated signal of channel i, (i = x, y, z)
 Norm_i = sensor sensitivity of channel i, (i = x, y, z), $\mu\text{V}/(\text{V}/\text{m})^2$ for E-field
 Probes ConvF = sensitivity enhancement in solution
 a_{ij} = 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):

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

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

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

with SAR = local specific absorption rate in mW/g

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

σ = conductivity in [mho/m] or [Siemens/m]

ρ = equivalent tissue density in g/cm^3

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



6.9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial No./ SW Version	Calibration	
				Last Cal.	Due Date
SPEAG	900MHz System Validation Kit	D900V2	1d064	2021.12.17	2024.12.16
SPEAG	1800MHz System Validation Kit	D1800V2	2d158	2021.12.17	2024.12.16
SPEAG	2000MHz System Validation Kit	D2000V2	1050	2021.12.18	2024.12.17
SPEAG	2600MHz System Validation Kit	D2600V2	1198	2022.08.17	2025.08.16
SPEAG	DOSIMETRIC ASSESSMENT SYSTEM	DASY52	52.10.4.1527	NCR	NCR
SPEAG	Dosimetric E-Field Probe	EX3DV4	3823	2023.09.14	2024.09.13
SPEAG	Data Acquisition Electronics	DAE3	373	2022.12.28	2023.12.27
SPEAG	Twin-SAM	QD000P41Ax	2020	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Network Emulator	MT8820C	6201274521	2023.02.09	2024.02.08
Agilent	Network Analyzer	E5071B	MY42404762	2023.02.09	2024.02.08
Speag	Dielectric Assessment KIT	DAK-3.5	1279	2023.08.03	2024.08.02
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2023.09.19	2024.09.18
R&S	Power Sensor	NRP8S	103215	2023.02.09	2024.02.08
Agilent	Power Meter	E4416A	MY45102093	2023.09.19	2024.09.18
R&S	Power Sensor	NRP8S	103240	2023.02.09	2024.02.08
Anritsu	Power Meter	E4418B	GB43318055	2023.06.21	2024.06.20
Agilent	Dual Directional Coupler	778D	50422	NA	NA
MCL	Attenuation 1	351-218-010	N/A	NA	NA
R&S	Spectrum Analyzer	N9030A	MY54170556	2023.10.07	2024.10.06
KTJ	Thermo meter	TA298	N/A	2022.12.08	2023.12.07
SPEAG	Tissue Simulating Liquids	HBBL600-10000V6		24H	

Note:

1. The calibration certificate of DASY can be referred to appendix F of this report.
2. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via the network analyzer and compensated during system check.
3. 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 Speag.
4. 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.

5. Attenuator insertion loss is calibrated by the network Analyzer, which the calibration is valid, before system check.
6. N.C.R means No Calibration Requirement.

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 15cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm, which is shown in Fig. 7.1. 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 in Fig. 7.2. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in below table.

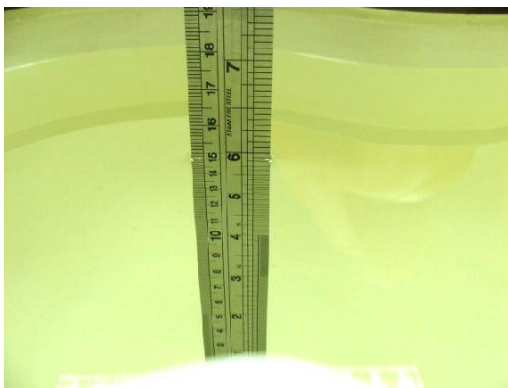


Fig 7.1 Photo of Liquid Height for Head SAR



Fig 7.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquids

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

Simulating Liquid for 5GHz, Manufactured by SPEAG.

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



Note: Please refer to the validation results for dielectric parameters of each frequency band. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a SPEAG Dielectric Assessment KIT and an Agilent Network Analyzer.

Table 1: Dielectric Performance of Tissue Simulating Liquid

Frequency (MHz)	Tissue Type	Liquid Temp.(°C)	Conductivity (σ)	Conductivity Target (σ)	Delta (σ) (%)	Limit (%)	Date
900	HSL	22.4	1.006	0.97	3.71	±5	2023.11.02
1800	HSL	22.2	1.357	1.40	-3.07	±5	2023.11.03
2000	HSL	22.5	1.394	1.40	-0.43	±5	2023.11.04
2600	HSL	22.1	1.948	1.96	-0.61	±5	2023.11.06

Frequency (MHz)	Tissue Type	Liquid Temp.(°C)	Permittivity (ϵ_r)	Permittivity Target (ϵ_r)	Delta (ϵ_r) (%)	Limit (%)	Date
900	HSL	22.4	42.371	41.50	2.10	±5	2023.11.02
1800	HSL	22.2	40.034	40.00	0.08	±5	2023.11.03
2000	HSL	22.5	39.958	40.00	-0.11	±5	2023.11.04
2600	HSL	22.1	39.262	39.00	0.67	±5	2023.11.06

8. SAR System Verification

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

8.1. 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.

8.2. System Setup

The output power on dipole port must be calibrated to 24 dBm (250 mW) before dipole is connected. In the simplified setup for system evaluation, the DUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which 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 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 8.1 Photo of Dipole Setup

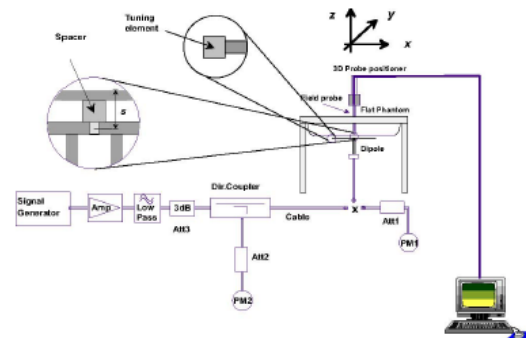


Fig 8.2 System Setup for System Evaluation



8.3. Validation Results

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%.

<Validation Setup>

Frequency (MHz)	Tissue Type	Input Power(mW)	Dipole S/N	Probe S/N	DAE S/N
900	HSL	250	D900V2-1d064	3823	373
1800	HSL	250	D1800V2-2d158	3823	373
2000	HSL	250	D2000V2-1050	3823	373
2600	HSL	250	D2600V2-1198	3823	373

<System Validation>

Frequency (MHz)	Tissue Type	Conductivity (σ)	Permittivity (ϵ_r)	CW Signal Validation		
				Sensitivity	Probe Linearity	Probe Isotropy
750	HSL	0.851	42.43	PASS	PASS	PASS
835	HSL	0.898	41.88	PASS	PASS	PASS
1750	HSL	1.386	39.91	PASS	PASS	PASS
1800	HSL	1.449	41.26	PASS	PASS	PASS
1900	HSL	1.435	39.65	PASS	PASS	PASS
2000	HSL	1.451	39.42	PASS	PASS	PASS
2300	HSL	1.764	38.99	PASS	PASS	PASS
2450	HSL	1.863	38.85	PASS	PASS	PASS
2600	HSL	1.973	38.58	PASS	PASS	PASS
3400	HSL	2.88	38.10	PASS	PASS	PASS
3500	HSL	2.91	37.90	PASS	PASS	PASS
3700	HSL	3.05	37.70	PASS	PASS	PASS
3900	HSL	3.15	37.50	PASS	PASS	PASS
4100	HSL	3.25	37.20	PASS	PASS	PASS
4200	HSL	3.34	37.00	PASS	PASS	PASS
4400	HSL	3.58	36.70	PASS	PASS	PASS
4600	HSL	3.70	36.60	PASS	PASS	PASS
4800	HSL	3.82	36.40	PASS	PASS	PASS
4900	HSL	3.96	36.20	PASS	PASS	PASS
5250	HSL	4.528	35.32	PASS	PASS	PASS
5600	HSL	4.905	34.89	PASS	PASS	PASS



5750	HSL	5.077	34.28	PASS	PASS	PASS
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Frequency (MHz)	Tissue Type	Conductivity (σ)	Permittivity (ϵ_r)	Modulation Signal Validation		
				Mod. Type	Duty Factor	PAR
750	HSL	0.851	42.43	N/A	N/A	N/A
835	HSL	0.898	41.88	GMSK	PASS	N/A
1750	HSL	1.386	39.91	N/A	N/A	N/A
1800	HSL	1.449	41.26	N/A	N/A	N/A
1900	HSL	1.435	39.65	GMSK	PASS	N/A
2000	HSL	1.451	39.42	GMSK	PASS	N/A
2300	HSL	1.764	38.99	OFDM	PASS	PASS
2450	HSL	1.863	38.85	OFDM	PASS	PASS
2600	HSL	1.973	38.58	TDD	PASS	N/A
3400	HSL	2.88	38.10	OFDM	PASS	PASS
3500	HSL	2.91	37.90	OFDM	PASS	PASS
3700	HSL	3.05	37.70	OFDM	PASS	PASS
3900	HSL	3.15	37.50	OFDM	PASS	PASS
4100	HSL	3.25	37.20	OFDM	PASS	PASS
4200	HSL	3.34	37.00	OFDM	PASS	PASS
4400	HSL	3.58	36.70	OFDM	PASS	PASS
4600	HSL	3.70	36.60	OFDM	PASS	PASS
4800	HSL	3.82	36.40	OFDM	PASS	PASS
4900	HSL	3.96	36.20	OFDM	PASS	PASS
5250	HSL	4.528	35.32	OFDM	N/A	PASS
5600	HSL	4.905	34.89	OFDM	N/A	PASS
5750	HSL	5.077	34.28	OFDM	N/A	PASS



<Validation Results>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2023.11.02	900	HSL	250	2.91	11.20	11.64	3.93
2023.11.03	1800	HSL	250	10.29	39.20	41.16	5.00
2023.11.04	2000	HSL	250	10.43	41.60	41.72	0.29
2023.11.06	2600	HSL	250	13.59	57.00	54.36	-4.63

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2023.11.02	900	HSL	250	1.82	7.19	7.28	1.25
2023.11.03	1800	HSL	250	5.33	20.10	21.32	6.07
2023.11.04	2000	HSL	250	5.47	20.70	21.88	5.70
2023.11.06	2600	HSL	250	6.71	25.70	26.84	4.44

Note: System checks the specific test data please see Annex C.

9. EUT Testing Position

This EUT was tested in six different positions. They are Front/Back/Right/Left/Right/Top/Bottom of the EUT with phantom 10 mm gap, as illustrated below, please refer to Appendix B for the test setup photos.

9.1. Body-worn Configurations

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration.

For body-worn and other configurations a flat phantom shall be used which is comprised of material with electrical properties similar to the corresponding tissues.

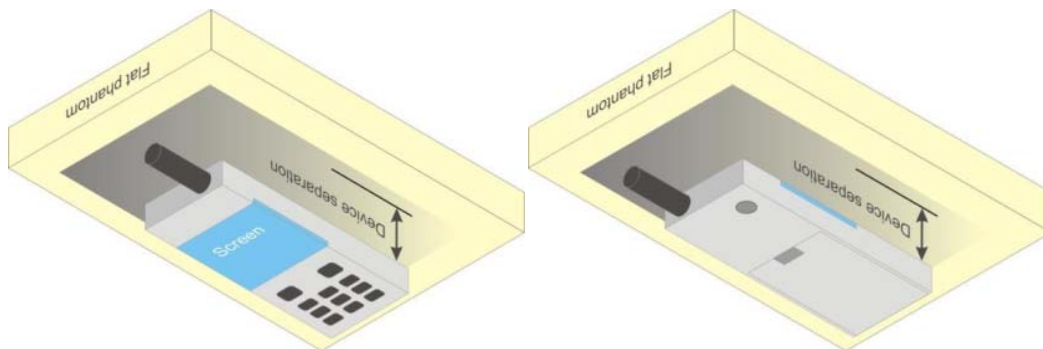


Fig 9.5 Illustration for Body Worn Position

9.2. Hotspot Mode Exposure Position Conditions

For handsets that support hotspot mode operations, with wireless router capabilities and various web browsing functions, the relevant hand and body exposure conditions are tested according to the hotspot SAR procedures in KDB 941225. A test separation distance of 10 mm is required between the phantom and all surfaces and edges with a transmitting antenna located within 25 mm from that surface or edge. When the form factor of a handset is smaller than 9 cm x 5 cm, a test separation distance of 5 mm (instead of 10 mm) is required for testing hotspot mode. When the separation distance required for body-worn accessory testing is larger than or equal to that tested for hotspot mode, in the same wireless mode and for the same surface of the phone, the hotspot mode SAR data may be used to support body-worn accessory SAR compliance for that particular configuration (surface).

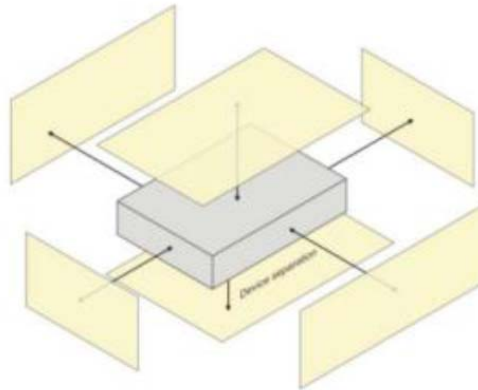


Fig 9.6 Illustration for Hotspot Position

10. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

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

<SAR measurement>

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

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

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

10.1. 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 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.

10.2. 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.

10.3. Area Scan Procedures

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.

When an Area Scan has measured all reachable points, it computes the field maxima founding the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE1528-2003.

10.4. Zoom Scan Procedures

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 10mm, with the side



length of the 10 g cube 21,5mm. The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5x5x7 (8mmx8mmx5mm) providing a volume of 32mm in the X & Y axis, and 30mm in the Z axis.

10.5. SAR Averaged Methods

In DASYS, the interpolation and extrapolation are both based on the modified Quadratic Sheppard'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.

10.6. Power Drift Monitoring

All SAR testing is under the DUT install full charged battery and transmit maximum output power. In DASYS measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of DUT 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.

11. SAR Test Procedure

11.1. General Scan Requirements

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.

		≤ 3 GHz	> 3 GHz	
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		5 mm \pm 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm \pm 0.5 mm	
Maximum probe angle from probe axis to phantom surface normal at the measurement location		$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$	
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}		≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm	
		When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.		
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	$\Delta z_{Zoom}(1)$: 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
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm	
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 IEEE Std 1528-2013 for details. * When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB Publication 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.				

11.2. Test Procedure

The Following steps are used for each test position

1. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface.
2. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
3. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
4. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

11.3. Description of Interpolation/Extrapolation Scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

11.4. Wireless Router

Some battery-operated handsets have the capability to transmit and receive user through simultaneous transmission of WIFI simultaneously with a separate licensed transmitter. The FCC has provided guidance in FCC KDB Publication 941225 D06 v02r01 where SAR test considerations for handsets ($L \times W \geq 9 \text{ cm} \times 5 \text{ cm}$) are based on a composite test separation distance of 10 from the front, back and edges of the device containing transmitting antennas within 2.5cm of their edges,



determined from general mixed use conditions for this type of devices. Since the hotspot SAR results may overlap with the body-worn accessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of both the WIFI transmitter and another licensed transmitter. Both transmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated for SAR under actual use conditions due to the limitations of the SAR assessment probes. Therefore, SAR must be evaluated for each frequency transmission and mode separately and spatially summed with the WIFI transmitter according to FCC KDB Publication 447498 D01v06 publication procedures. The "Portable Hotspot" feature on the handset was NOT activated during SAR assessments, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal at a time.



12. SAR Test Configuration

<GSM Mode>

A summary of these settings are illustrated below:

For GSM850 frequency band, the power control is set to 5 for GSM/GPRS mode (GSMK-CS1) and set to 8 for EDGE mode (MCS5); For GSM1900 frequency band, the power control is set to 0 for GSM/GPRS mode (GSMK-CS1) and set to 2 for EDGE mode (MCS5).

1. Per KDB 447498 D01v06, the maximum output power channel is used for SAR testing and for further SAR test reduction.
2. Per KDB 941225 D01v03r01, SAR test reduction for GSM / GPRS / EDGE modes is determined by the source-based time-averaged output power including tune-up tolerance. The mode with highest specified time-averaged output power should be tested for SAR compliance in the applicable exposure conditions. For modes with the same specified maximum output power and tolerance, the higher number time-slot configuration should be tested. Therefore, the GPRS (4Tx slots) for GSM850/GSM1900 is considered as the primary mode.
3. Other configurations of GSM / GPRS / EDGE are considered as secondary modes.

Timeslot consignations:

Remark:

1. The frame-averaged power is linearly reported the maximum burst averaged power over 8 time slots. The calculated method are shown as below:
The duty cycle "x" of different time slots as below:
1 TX slot is 1/8, 2 TX slots is 2/8, 3 TX slots is 3/8 and 4 TX slots is 4/8
Based on the calculation formula:
Frame-averaged power = Burst averaged power + 10 log (x)
So,
Frame-averaged power (1 TX slot) = Burst averaged power (1 TX slot) – 9.03
Frame-averaged power (2 TX slots) = Burst averaged power (2 TX slots) – 6.02
Frame-averaged power (3 TX slots) = Burst averaged power (3 TX slots) – 4.26
Frame-averaged power (4 TX slots) = Burst averaged power (4 TX slots) – 3.01
2. CS1 coding scheme was used in GPRS conducted power measurements and SAR testing, MCS5 coding scheme was used in EGPRS conducted power measurements and SAR testing (if necessary).

No. of Slots:	Slot 1	Slot 2	Slot 3	Slot 4
Slot Consignation:	1Up 4Down	2Up 3Down	3Up 2Down	4Up 1Down
Duty Cycle:	1:8.3	1:4.15	1:2.77	1:2.08
Correct Factor:	-9.03dB	-6.02dB	-4.26dB	-3.01dB

**<LTE Mode>****LTE Target MPR level**

The device implements maximum power reduction per 3GPP 36.101 requirements where the MPR target is as below table. The MPR settings are implemented configured into firmware and cannot be disabled by the end user or LTE carrier network.

Modulation	Channel bandwidth / Transmission bandwidth configuration [RB]						MPR	3GPP
	1.4	3.0	5	10	15	20	Target	MPR
	MHz	MHz	MHz	MHz	MHz	MHz	(dB)	(dB)
QPSK	> 5	> 4	> 8	> 12	> 16	> 18	1	≤ 1
16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	1	≤ 1

Note: The measurement result showed some difference from the target MPR level, due to expected 0.5dB measurement tolerance

LTE Bands

LTE Bands	Channel bandwidth / Transmission bandwidth configuration [RB]					
	1.4	3.0	5	10	15	20
	MHz	MHz	MHz	MHz	MHz	MHz
2	√	√	√	√	√	√
4	√	√	√	√	√	√
5	√	√	√	√	N/A	N/A
7	N/A	N/A	√	√	√	√

Note:

1. Per KDB 941225 D05v02r05, when a properly configured base station simulator is used for the SAR and power measurements, spectrum plots for each RB allocation and offset configuration is not required.
2. Per KDB 941225 D05v02r05, start with the largest channel bandwidth and measure SAR for QPSK with 1 RB allocation, using the RB offset and required test channel combination with the highest maximum output power for RB offsets at the upper edge, middle and lower edge of each required test channel.
3. Per KDB 941225 D05v02r05, 50% RB allocation for QPSK SAR testing follows 1RB QPSK allocation procedure.
4. Per KDB 941225 D05v02r05, for QPSK with 100% RB allocation, SAR is not required when the highest maximum output power for 100 % RB allocation is less than the highest maximum output power in 50% and 1 RB allocations and the highest reported SAR for 1 RB and 50% RB allocation are ≤ 0.8 W/kg. Otherwise, SAR is measured for the highest output power channel; and if the reported SAR is > 1.45 W/kg, the remaining required test channels must also be tested.
5. Per KDB 941225 D05v02r05, 16QAM/64QAM output power for each RB allocation configuration is > not ½ dB higher than the same configuration in QPSK and the reported SAR for the QPSK configuration is ≤ 1.45 W/kg; Per KDB941225 D05v02r05, 16QAM/64QAM SAR testing is not



required.

6. Per KDB 941225 D05v02r05, smaller bandwidth output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ Db higher than the same configuration in the largest supported bandwidth, and the reported SAR for the largest supported band width is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, smaller bandwidth SAR testing is not required.
7. For LTE B4 / B5 / B7 / B17 the maximum bandwidth does not support three non-overlapping channels, per KDB941225 D05v02r05, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.
8. LTE band 2 / 12 SAR test was covered by Band 25 / 17; according to April 2015 TCB workshop, SAR test for overlapping LTE bands can be reduced if
 - a. The maximum output power, including tolerance, for the smaller band is \leq the larger band to qualify for the SAR test exclusion.
 - b. The channel bandwidth and other operating parameters for the smaller band are fully supported by the larger band.
9. According to 2017 TCB workshop, for 64 QAM and 16 QAM should be verified by checking the signal constellation with a call box to avoid incorrect maximum power levels due to MPR and other requirements associated with signal modulation, and the following figure is taken from the "Fundamental Measurement >> Modulation Analysis >> constellation" mode of the device connect to the CMW500 base station, therefore, the device 64QAM and 16QAM signal modulation are correct. Identify if Maximum Power Reduction (MPR) is optional or mandatory, i.e. built-in by design: only mandatory MPR may be considered during SAR testing, when the maximum output power is permanently limited by the MPR implemented within the UE; and only for the applicable RB (resource block) configurations specified in LTE standards: b) A-MPR (additional MPR) must be disabled.
10. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
 - c. For WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
 - d. For WLAN/Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor
11. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is: ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or



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10-g respectively, when the transmission band is ≥ 200 MHz

12. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/kg.
13. Per KDB 648474 D04v01r03, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.



13. Conducted Power List

Remark: The output power of GSM/LTE/Bluetooth was recorded in annex E of this report.

14. Hotspot Mode Evaluation Procedure

➤ EUT Antenna Location

The location of antenna was recorded in annex B
GSM/LTE Antenna: TX/RX: GSM850/1900, LTE Band 2/4/5/7
BT & GPS Antenna: TX/RX: Bluetooth RX: GPS

➤ EUT Antenna Distance

Antenna Location	Front	Back	Left	Right	Top	Bottom
WWAN Main Antenna	<5mm	<5mm	<25mm	<5mm	>25mm	<5mm
WLAN/BT Antenna	<5mm	<5mm	<5mm	<25mm	<5mm	>25mm

➤ Hotspot Evaluation

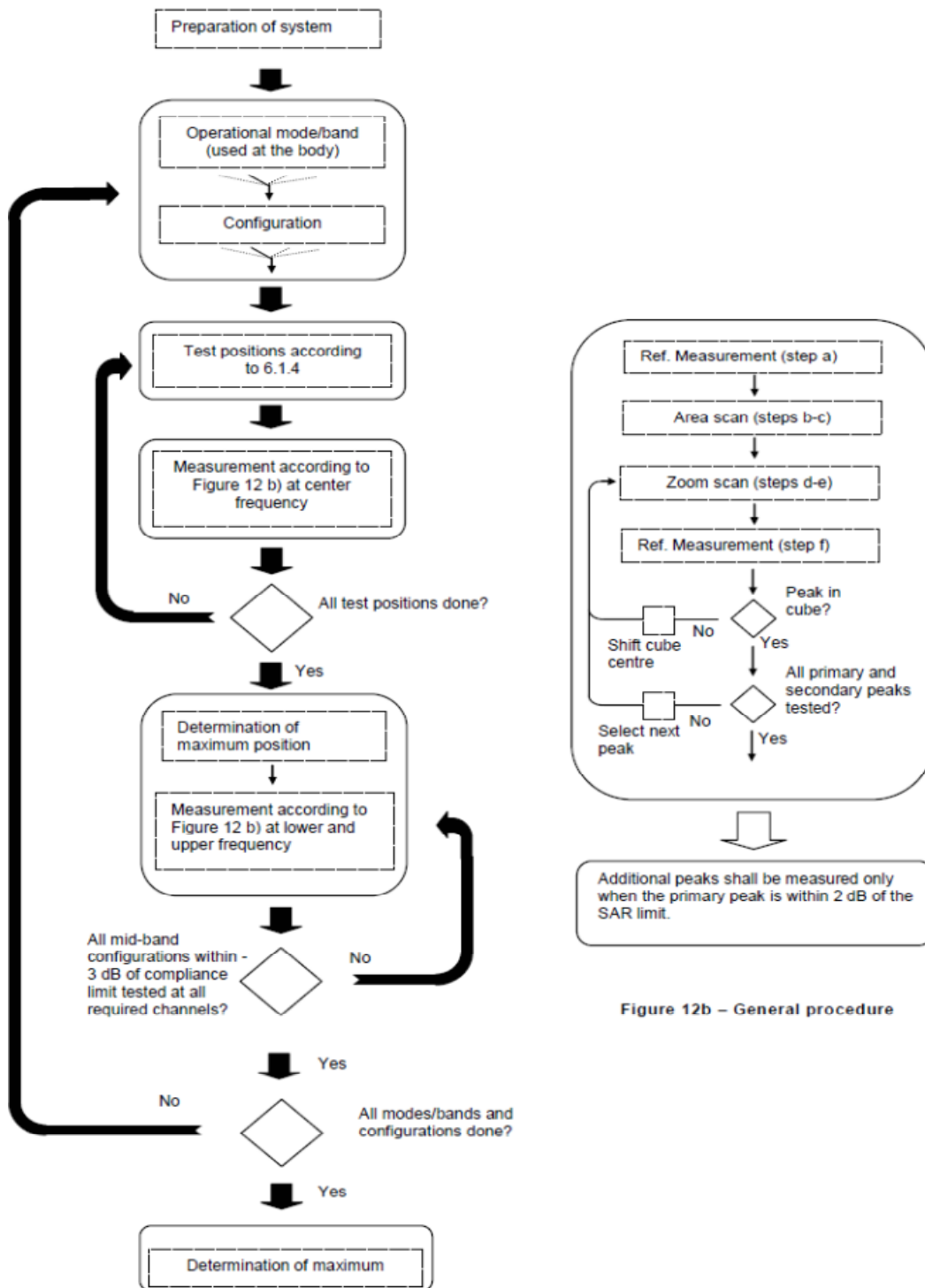
Assessment	Hotspot Side for SAR Test Distance: 10mm					
Antennas	Front	Back	Left	Right	Top	Bottom
Main Antenna	Yes	Yes	Yes	Yes	No	Yes
GPS/WIFI Antenna	Yes	Yes	Yes	Yes	Yes	No

Note :

1. The SAR evaluation procedures for Portable Devices with Wireless Router function is according to KDB 941225 D06 Hotspot SAR v02r01.
2. Head/Body-worn/Hotspot mode SAR assessments are required.
3. Referring to KDB 941225 D06, when the overall device length and width are $\geq 9\text{cm} \times 5\text{cm}$, the test distance is 10 mm. SAR must be measured for all sides and surfaces with a transmitting antenna located within 25mm from that surface or edge.

15. Block Diagram of the Tests to be Performed

15.1. Body



16. Test Results List

16.1. Test Guidance

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor.
 - c. For Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor.
2. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
 - a. ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
 - b. ≤ 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
 - c. ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/kg.
4. Per KDB 648474 D04v01r03, when the reported SAR for a body-worn accessory measured without a headset connected to the handset is ≤ 1.2 W/kg, SAR testing with a headset connected to the handset is not required.
5. Per KDB648474 D04v01r03, for smart phones with a display diagonal dimension > 15.0 cm or an overall diagonal dimension > 16.0 cm, when hotspot mode applies, 10-g extremity SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg, however, when power reduction applies to hotspot mode the measured SAR must be scaled to the maximum output power, including tolerance, allowed for tablet modes to compare with the 1.2 W/kg SAR test reduction threshold.



16.2. Body SAR Data

> GSM Body SAR

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
1#	GPRS 850(3 TX slots)	Front Side	190	29.87	30.50	1.156	0.195	0.225
	GPRS 850(3 TX slots)	Back Side	190	29.87	30.50	1.156	0.182	0.210
	GPRS 850(3 TX slots)	Left Side	190	29.87	30.50	1.156	0.129	0.149
	GPRS 850(3 TX slots)	Right Side	190	29.87	30.50	1.156	0.051	0.059
	GPRS 850(3 TX slots)	Bottom Side	190	29.87	30.50	1.156	0.156	0.180
2#	GPRS 1900(3 TX slots)	Front Side	661	26.38	27.00	1.153	0.173	0.200
	GPRS 1900(3 TX slots)	Back Side	661	26.38	27.00	1.153	0.548	0.632
	GPRS 1900(3 TX slots)	Left Side	661	26.38	27.00	1.153	0.167	0.193
	GPRS 1900(3 TX slots)	Right Side	661	26.38	27.00	1.153	0.161	0.186
	GPRS 1900(3 TX slots)	Bottom Side	661	26.38	27.00	1.153	0.374	0.431

> LTE QPSK Body SAR

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
3#	LTE Band 2/1RB#0 20M	Front Side	18900	22.72	23.50	1.197	0.153	0.183
	LTE Band 2/1RB#0 20M	Back Side	18900	22.72	23.50	1.197	0.543	0.650
	LTE Band 2/1RB#0 20M	Left Side	18900	22.72	23.50	1.197	0.025	0.030
	LTE Band 2/1RB#0 20M	Right Side	18900	22.72	23.50	1.197	0.030	0.036
	LTE Band 2/1RB#0 20M	Bottom Side	18900	22.72	23.50	1.197	0.343	0.410
	LTE Band 2/50RB#0 20M	Front Side	18900	21.78	22.50	1.180	0.103	0.122
	LTE Band 2/50RB#0 20M	Back Side	18900	21.78	22.50	1.180	0.349	0.412
	LTE Band 2/50RB#0 20M	Left Side	18900	21.78	22.50	1.180	0.018	0.021
	LTE Band 2/50RB#0 20M	Right Side	18900	21.78	22.50	1.180	0.026	0.031
	LTE Band 2/50RB#0 20M	Bottom Side	18900	21.78	22.50	1.180	0.185	0.218
4#	LTE Band 4/1RB#0 20M	Front Side	20175	22.93	23.50	1.140	0.141	0.161
	LTE Band 4/1RB#0 20M	Back Side	20175	22.93	23.50	1.140	0.368	0.420
	LTE Band 4/1RB#0 20M	Left Side	20175	22.93	23.50	1.140	0.027	0.031
	LTE Band 4/1RB#0 20M	Right Side	20175	22.93	23.50	1.140	0.029	0.033
	LTE Band 4/1RB#0 20M	Bottom Side	20175	22.93	23.50	1.140	0.145	0.165
	LTE Band 4/50RB#0 20M	Front Side	20175	21.96	22.50	1.132	0.100	0.113
	LTE Band 4/50RB#0 20M	Back Side	20175	21.96	22.50	1.132	0.202	0.229



	LTE Band 4/50RB#0 20M	Left Side	20175	21.96	22.50	1.132	0.034	0.039
	LTE Band 4/50RB#0 20M	Right Side	20175	21.96	22.50	1.132	0.038	0.043
	LTE Band 4/50RB#0 20M	Bottom Side	20175	21.96	22.50	1.132	0.122	0.138
5#	LTE Band 5/1RB#0 10M	Front Side	20525	23.29	24.00	1.178	0.220	0.259
	LTE Band 5/1RB#0 10M	Back Side	20525	23.29	24.00	1.178	0.188	0.221
	LTE Band 5/1RB#0 10M	Left Side	20525	23.29	24.00	1.178	0.175	0.206
	LTE Band 5/1RB#0 10M	Right Side	20525	23.29	24.00	1.178	0.082	0.097
	LTE Band 5/1RB#0 10M	Bottom Side	20525	23.29	24.00	1.178	0.178	0.210
	LTE Band 5/25RB#0 10M	Front Side	20525	22.27	23.00	1.183	0.204	0.241
	LTE Band 5/25RB#0 10M	Back Side	20525	22.27	23.00	1.183	0.169	0.200
	LTE Band 5/25RB#0 10M	Left Side	20525	22.27	23.00	1.183	0.128	0.151
	LTE Band 5/25RB#0 10M	Right Side	20525	22.27	23.00	1.183	0.060	0.071
	LTE Band 5/25RB#0 10M	Bottom Side	20525	22.27	23.00	1.183	0.136	0.161
	LTE Band 7/1RB#0 20M	Front Side	21100	22.32	23.00	1.169	0.233	0.272
6#	LTE Band 7/1RB#0 20M	Back Side	21100	22.32	23.00	1.169	0.493	0.577
	LTE Band 7/1RB#0 20M	Left Side	21100	22.32	23.00	1.169	0.181	0.212
	LTE Band 7/1RB#0 20M	Right Side	21100	22.32	23.00	1.169	0.393	0.460
	LTE Band 7/1RB#0 20M	Bottom Side	21100	22.32	23.00	1.169	0.219	0.256
	LTE Band 7/50RB#0 20M	Front Side	21100	21.45	22.00	1.135	0.168	0.191
	LTE Band 7/50RB#0 20M	Back Side	21100	21.45	22.00	1.135	0.344	0.390
	LTE Band 7/50RB#0 20M	Left Side	21100	21.45	22.00	1.135	0.123	0.140
	LTE Band 7/50RB#0 20M	Right Side	21100	21.45	22.00	1.135	0.145	0.165
	LTE Band 7/50RB#0 20M	Bottom Side	21100	21.45	22.00	1.135	0.145	0.165



➤ **Bluetooth Body SAR**

When standalone SAR is not required to be measured, per FCC KDB 447498 D01v06 4.3.2), the following equation must be used to estimate the standalone 1g SAR.

$$\text{Estimated SAR} = \frac{\sqrt{f(\text{GHz})}}{7.5} \cdot \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}}$$

Channel	Frequency (GHz)	Max. Tune-up Power (dBm)	Max. Power(mW)	Test Distance (mm)	Result	Exclusion Thresholds for 1-g/10g SAR
CH 39	2.441	2.5	1.78	10	0.28	3.0

Mode	Max. Tune-up Power (dBm)	Exposure Position	Body
		Test Distance (mm)	10
Bluetooth	2.5	Estimated SAR (W/kg)	0.037

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-up Limit (dBm)	Tune-up Scaling Factor	Meas. SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
	Bluetooth/DH5	Front Side	39	1.55	2.50	1.245	0.037	0.049
	Bluetooth/DH5	Back Side	39	1.55	2.50	1.245	0.037	0.049
	Bluetooth/DH5	Left Side	39	1.55	2.50	1.245	0.037	0.049
	Bluetooth/DH5	Right Side	39	1.55	2.50	1.245	0.037	0.049
	Bluetooth/DH5	Top Side	39	1.55	2.50	1.245	0.037	0.049

Note:

1. According to 2016 Oct. TCB workshop for Bluetooth SAR consideration and the theoretical duty cycle is 83.3%, therefore the actual duty cycle will be scaled up to the theoretical value of Bluetooth reported SAR calculation. The duty cycle of Bluetooth is 77.81 %, Therefore the duty cycle scaling factor 1.071 should be used to calculating the reported SAR.
2. The estimated SAR is used only to determine simultaneous transmission SAR test exemption; it shall not be reported as the standalone SAR.



17. Simultaneous Transmission Evaluation

17.1. Simultaneous Transmission Consideration

No.	Simultaneous Transmission Consideration	Body
1	WWAN+Bluetooth	Yes

Note:

1. When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of the WWAN transmitters. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.
2. The hotspot SAR result may overlap with the body-worn accessory SAR requirements, per KDB 941225 D06, the more conservative configurations can be considered, thus excluding some unnecessary body-worn accessory SAR tests.
3. Per KDB 447498D01v06, simultaneous transmission SAR evaluation procedures is as followed:
Step 1: If sum of 1 g SAR < 1.6 W/kg, Simultaneous SAR measurement is not required.
Step 2: If sum of 1 g SAR > 1.6 W/kg, ratio of SAR to peak separation distance for pair of transmitters calculated.
Step 3: If the ratio of SAR to peak separation distance is ≤ 0.04 , Simultaneous SAR measurement is not required.
Step 4: If the ratio of SAR to peak separation distance is > 0.04 , Simultaneous SAR measurement is required and simultaneous transmission SAR value is calculated.
(The ratio is determined by: $(SAR1 + SAR2) \wedge 1.5/Ri \leq 0.04$,
Ri is the separation distance between the peak SAR locations for the antenna pair in mm.

17.2. Simultaneous Transmission Analysis

➤ Body Simultaneous Transmission for WWAN+Bluetooth

WWAN Band	Exposure Position	1	2	1+2 Summed 1g SAR (W/kg)
		WWAN	Bluetooth	
		1g SAR (W/kg)	1g SAR (W/kg)	
GSM 850	Front Side	0.225	0.049	0.274
	Back Side	0.210	0.049	0.259
	Left Side	0.149	0.049	0.198
	Right Side	0.059	0.049	0.108
	Top Side	/	0.049	0.049
	Bottom Side	0.180	/	0.180
GSM 1900	Front Side	0.200	0.049	0.249
	Back Side	0.632	0.049	0.681
	Left Side	0.193	0.049	0.242
	Right Side	0.186	0.049	0.235
	Top Side	/	0.049	0.049
	Bottom Side	0.431	/	0.431
LTE Band 2	Front Side	0.183	0.049	0.232
	Back Side	0.650	0.049	0.699
	Left Side	0.030	0.049	0.079
	Right Side	0.036	0.049	0.085
	Top Side	/	0.049	0.049
	Bottom Side	0.410	/	0.410
LTE Band 4	Front Side	0.161	0.049	0.210
	Back Side	0.420	0.049	0.469
	Left Side	0.039	0.049	0.088
	Right Side	0.043	0.049	0.092
	Top Side	/	0.049	0.049
	Bottom Side	0.165	/	0.165
LTE Band 5	Front Side	0.259	0.049	0.308
	Back Side	0.221	0.049	0.270
	Left Side	0.206	0.049	0.255
	Right Side	0.097	0.049	0.146
	Top Side	/	0.049	0.049
	Bottom Side	0.210	/	0.210
LTE Band 7	Front Side	0.272	0.049	0.321



	Back Side	0.577	0.049	0.626
	Left Side	0.212	0.049	0.261
	Right Side	0.460	0.049	0.509
	Top Side	/	0.049	0.049
	Bottom Side	0.256	/	0.256

18. Uncertainty Assessment

According to KDB 865664 D01 SAR measurement 100 MHz to 6GHz, when the highest measured 1-g SAR is less than 1.5 W/kg and 10-g extremity SAR less than 3.75 W/kg, the expanded SAR measurement uncertainty must be less than 30% with a confidence interval of $k=2$. When these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE 1528-2013 is not required in the SAR report and submitted for equipment approval. For this device, both the 1-g SAR is less than 1.5 W/kg. Therefore the measurement uncertainty table is not required in this report.



Annex A General Information

1. Identification of the Responsible Testing Laboratory

Laboratory Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Laboratory Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, Guangdong Province, P. R. China
Telephone:	+86 755 36698555
Facsimile:	+86 755 36698525

2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, Guangdong Province, P. R. China

3. Facilities and Accreditations

The FCC designation number is CN1192, the test firm registration number is 226174.

Note:

The main report is end here and the other Annex (B,C,D,E,F) will be submitted separately.

***** END OF MAIN REPORT *****