

SAR TEST REPORT

Applicant: M5Stack Technology Co., Ltd

Address: 5F, Tangwei Stock Commercial Building Youli Road, Bao'an District,
Shenzhen, Guangdong, China

FCC ID: 2AN3WM5NANOC6

Product Name: M5NanoC6

Model Number: NanoC6

Standard(s): 47 CFR Part 2(2.1093)

The above device has been tested and found compliant with the requirement of the relative standards by China Certification ICT Co., Ltd (Dongguan)

Report Number: CR231274561-SA

Date Of Issue: 2024-02-27

Reviewed By: Ken Zong

Title: SAR Project Engineer

Ken Zong

Approved By: Karl Gong

Title: SAR Engineer

Karl Gong

Test Laboratory: China Certification ICT Co., Ltd (Dongguan)

No. 113, Pingkang Road, Dalang Town, Dongguan,
Guangdong, China
Tel: +86-769-82016888

SAR TEST RESULTSSUMMARY

Operation Frequency Bands	Highest Reported 1g SAR (W/kg)		Limits (W/kg)	
	Head SAR	Body SAR (Gap 5mm)		
WLAN 2.4G	NA	0.07	1.6	
BLE	NA	0.04		
ZigBee/Thread	NA	0.01		
Maximum Simultaneous Transmission SAR				
Items	Head SAR	Body SAR (Gap 5mm)	Hotspot (Gap 5mm)	Limits
Sum SAR(W/kg)	NA	NA	NA	1.6
SPLSR	NA	NA	NA	0.04
EUT Received Date:	2023/12/18			
Tested Date:	2024/01/29			
Tested Result:	Pass			

Test Facility

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No. : 442868, the FCC Designation No. : CN1314.

Declarations

China Certification ICT Co., Ltd (Dongguan) is not responsible for the authenticity of any test data provided by the applicant. Data included from the applicant that may affect test results are marked with a triangle symbol “▲”. Customer model name, addresses, names, trademarks etc. are not considered data.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested.

This report cannot be reproduced except in full, without prior written approval of the Company.

This report is valid only with a valid digital signature. The digital signature may be available only under the Adobe software above version 7.0.

This report may contain data that are not covered by the accreditation scope and shall be marked with an asterisk “★”.

CONTENTS

DOCUMENT REVISION HISTORY	6
1. GENERAL INFORMATION	7
1.1 PRODUCT DESCRIPTION FOR DEVICE UNDER TEST (EUT)	7
1.2 TEST SPECIFICATION, METHODS AND PROCEDURES	8
1.3 SAR LIMITS.....	9
1.4 FACILITIES.....	10
2. SAR MEASUREMENT SYSTEM.....	11
3. EQUIPMENT LIST AND CALIBRATION	18
3.1 EQUIPMENTS LIST & CALIBRATION INFORMATION	18
4. SAR MEASUREMENT SYSTEM VERIFICATION	19
4.1 LIQUID VERIFICATION	19
4.2 SYSTEM ACCURACY VERIFICATION	20
4.3 SAR SYSTEM VALIDATION DATA.....	21
5. EUT TEST STRATEGY AND METHODOLOGY	22
5.1 SIMPLE DONGLE PROCEDURES	22
TEST DISTANCE FOR SAR EVALUATION.....	22
5.6 SAR EVALUATION PROCEDURE	23
6. CONDUCTED OUTPUT POWER MEASUREMENT	24
6.1 TEST PROCEDURE.....	24
6.3 MAXIMUM TARGET OUTPUT POWER.....	24
6.4 TEST RESULTS:	25
7. Standalone SAR test exclusion considerations	27
7.2 STANDALONE SAR TEST EXCLUSION CONSIDERATIONS.....	27
8. SAR MEASUREMENT RESULTS	28
8.1 SAR TEST DATA	28
9. Measurement Variability	31
10. SAR SIMULTANEOUS TRANSMISSION DESCRIPTION	32
11. SAR Plots	33
APPENDIX A MEASUREMENT UNCERTAINTY	34
APPENDIX B EUT TEST POSITION PHOTOS	36

APPENDIX C CALIBRATION CERTIFICATES 37

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	CR231274561-SA	Original Report	2024-02-27

1. GENERAL INFORMATION

1.1 Product Description for device under Test (EUT)

Device Type:	Portable
Exposure Category:	Population / Uncontrolled
Antenna Type(s):	Internal Antenna
Operation modes:	WLAN, Bluetooth and Zigbee
Frequency Band:	WLAN 2.4G: 2412-2472 MHz (TX/RX) BLE: 2402-2480MHz(TX/RX) Zigbee/Thread: 2405-2480 MHz(TX/RX)
Dimensions (L*W*H):	23.5*12*9.5mm
Rated Input Voltage:	DC5V from USB Cable
Serial Number:	2FDS-1
Normal Operation:	Body Worn

1.2 Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE 1528-2013, the following FCC Published RF exposure KDB procedures:

KDB 447498 D01 General RF Exposure Guidance v06
KDB 447498 D02 SAR Procedures for Dongle Xmtr v02r01
KDB865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
KDB865664 D02 RF Exposure Reporting v01r02
KDB 248227 D01 802.11 Wi-Fi SAR v02r02

TCB Workshop April 2019: RF Exposure Procedures

1.3 SAR Limits**FCC Limit**

EXPOSURE LIMITS	SAR (W/kg)	
	(General Population / Uncontrolled Exposure Environment)	(Occupational / Controlled Exposure Environment)
Spatial Average (averaged over the whole body)	0.08	0.4
Spatial Peak (averaged over any 1 g of tissue)	1.60	8.0
Spatial Peak (hands/wrists/feet/ankles averaged over 10 g)	4.0	20.0

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

Occupational/Controlled Environments are defined as locations where there is exposure that maybe incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

General Population/Uncontrolled environments Spatial Peak limit 1.6W/kg for 1g SAR applied to the EUT.

1.4 FACILITIES

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The test sites and measurement facilities used to collect data are located at:

<input checked="" type="checkbox"/> SAR Lab 1	<input type="checkbox"/> SAR Lab 2
---	------------------------------------

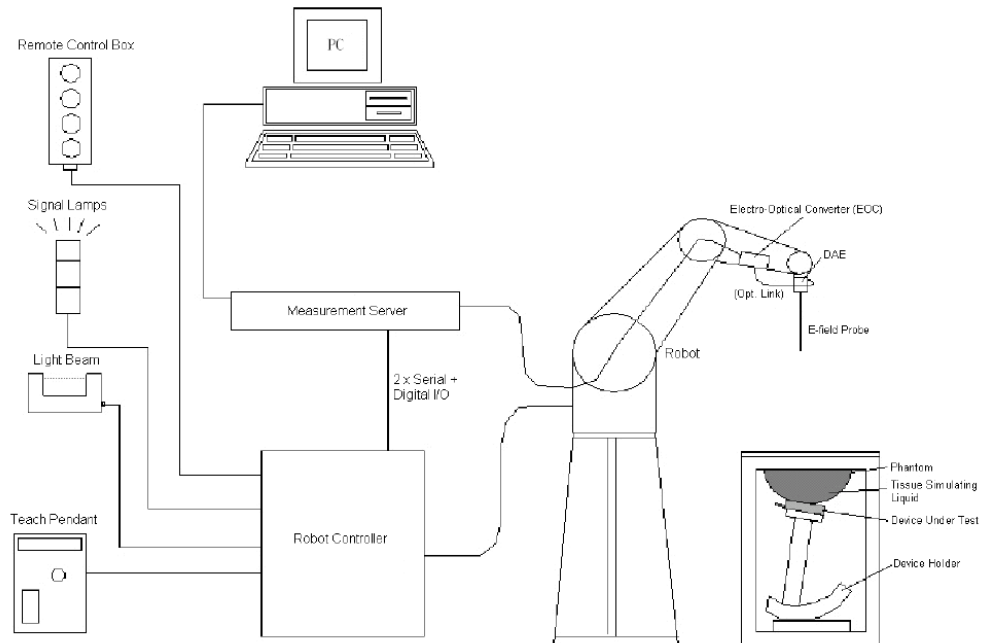
2. SAR MEASUREMENTSYSTEM

These measurements were performed with the automated near-field scanning system DASY5 from Schmid & Partner Engineering AG (SPEAG) which is the Fifth generation of the system shown in the figure hereinafter:



DASY5 System Description

The DASY5 system for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal application, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7 professional operating system and the DASY52 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

DASY5 Measurement Server

The DASY5 measurement server is based on a PC/104 CPU board with a 400MHz Intel ULVCeleron, 128MB chip-disk and 128MB RAM. The necessary circuits for communication with the DAE4 (or DAE3) electronics box, as well as the 16 bit AD-converter system for optical detection and digital I/O interface are contained on the DASY5 I/O board, which is directly connected to the PC/104 bus of the CPU board.



The measurement server performs all real-time data evaluation of field measurements and surface detection, controls robot movements and handles safety operation. The PC operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with an expansion port which is reserved for future applications. Please note that this expansion port does not have a standardized point out, and therefore only devices provided by SPEAG can be connected. Devices from any other supplier could seriously damage the measurement server.

Data Acquisition Electronics

The data acquisition electronics (DAE4) consist 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 with a 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 mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection.

The input impedance of both the DAE4 as well as of the DAE3 box is 200M Ω ; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.

ES3DV3 E-Field Probes

Frequency	10 MHz - 4 GHz Linearity: ± 0.2 dB (30 MHz to 4 GHz)
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)
Dynamic Range	5 μ W/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 3.9 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 2.0 mm
Application	General dosimetry up to 4 GHz Dosimetry in strong gradient fields Compliance tests of mobile phones
Compatibility	DASY3, DASY4, DASY52, DASY6, DASY8 SAR, EASY6, EASY4/MRI

Calibration Frequency Points for ES3DV3 E-Field Probes SN: 3157 Calibrated: 2023/4/10

Calibration Frequency Point(MHz)	Frequency Range(MHz)		Conversion Factor		
	From	To	X	Y	Z
750 Head	650	850	6.48	6.48	6.48
900 Head	850	1000	6.25	6.25	6.25
1750 Head	1650	1850	5.38	5.38	5.38
1900 Head	1850	2000	5.18	5.18	5.18
2300 Head	2200	2400	4.96	4.96	4.96
2450 Head	2400	2550	4.74	4.74	4.74
2600 Head	2550	2700	4.52	4.52	4.52

SAM Twin Phantom

The SAM twin phantom is a fiberglass shell phantom with 2mm shell thickness (except the ear region, where shell thickness increases to 6 mm). The phantom has three measurement areas:

- _ Left Head
- _ Right Head
- _ Flat phantom

The phantom table for the DASY systems based on the robots have the size of 100 x 50 x 85 cm (L x W x H). For easy dislocation these tables have fork lift cut outs at the bottom.

The bottom plate contains three pairs of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. Only one device holder is necessary if two phantoms are used (e.g., for different liquids)



A white cover is provided to cover the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. Free space scans of devices on top of this phantom cover are possible. Three reference marks are provided on the phantom counter. These reference marks are used to teach the absolute phantom position relative to the robot.

Robots

The DASY5 system uses the high precision industrial robot. The robot offers the same features important for our application:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brushless synchrony motors; no stepper motors)
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)

The above mentioned robots are controlled by the Staubli CS8c robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is contained on the CDs delivered along with the robot. Paper manuals are available upon request direct from Staubli.

SAR Scan Procedures

Step 1: 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. The minimum distance of probe sensors to surface is 1.4 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scans

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 15mm² step integral, with 1.5mm interpolation used to locate the peak SAR area used for zoom scan assessments.

Where the system identifies multiple SAR peaks (which are within 25% of peak value) the system will provide the user with the option of assessing each peak location individually for zoom scan averaging.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
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 ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan (Cube Scan Averaging)

The averaging zoom scan volume utilized in the DASY5 software is in the shape of a cube and the side dimension of a 1 g or 10 g mass is dependent on the density of the liquid representing the 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 1 g cube is 5mm, with the side length of the 10g cube is 21.5mm.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

			≤ 3 GHz	> 3 GHz
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	≤ 1.5 · $\Delta z_{Zoom}(n-1)$ 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.				

Step 4: Power Drift Measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

When the cube intersects with the surface of the phantom, it is oriented so that 3 vertices touch the surface of the shell or the center of a face is tangent to the surface. The face of the cube closest to the surface is modified in order to conform to the tangent surface.

The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications (including FCC) utilize a physical step of 7 x 7 x 7 (5mmx5mmx5mm) providing a volume of 30 mm in the X & Y & Z axis.

Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEC 62209-1:2016

Recommended Tissue Dielectric Parameters for Head liquid

Table A.3 – Dielectric properties of the head tissue-equivalent liquid

Frequency MHz	Relative permittivity ϵ_r	Conductivity (σ) S/m
300	45,3	0,87
450	43,5	0,87
<i>750</i>	<i>41,9</i>	<i>0,89</i>
835	41,5	0,90
900	41,5	0,97
1 450	40,5	1,20
<i>1 500</i>	<i>40,4</i>	<i>1,23</i>
<i>1 640</i>	<i>40,2</i>	<i>1,31</i>
<i>1 750</i>	<i>40,1</i>	<i>1,37</i>
1 800	40,0	1,40
1 900	40,0	1,40
2 000	40,0	1,40
<i>2 100</i>	<i>39,8</i>	<i>1,49</i>
<i>2 300</i>	<i>39,5</i>	<i>1,67</i>
2 450	39,2	1,80
<i>2 600</i>	<i>39,0</i>	<i>1,96</i>
3 000	38,5	2,40
<i>3 500</i>	<i>37,9</i>	<i>2,91</i>
<i>4 000</i>	<i>37,4</i>	<i>3,43</i>
<i>4 500</i>	<i>36,8</i>	<i>3,94</i>
<i>5 000</i>	<i>36,2</i>	<i>4,45</i>
<i>5 200</i>	<i>36,0</i>	<i>4,66</i>
<i>5 400</i>	<i>35,8</i>	<i>4,86</i>
<i>5 600</i>	<i>35,5</i>	<i>5,07</i>
<i>5 800</i>	<i>35,3</i>	<i>5,27</i>
6 000	35,1	5,48

NOTE For convenience, permittivity and conductivity values at those frequencies which are not part of the original data provided by Drossos et al. [33] or the extension to 5 800 MHz are provided (i.e. the values shown *in italics*). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6 000 MHz that were linearly extrapolated from the values at 3 000 MHz and 5 800 MHz.

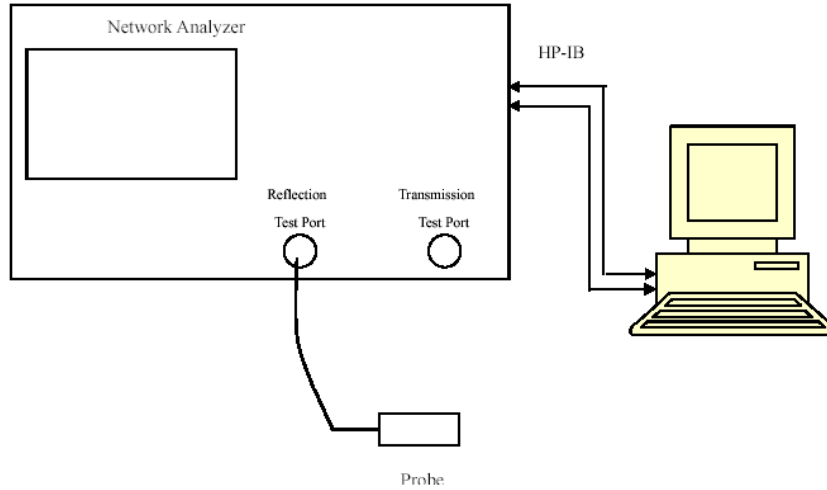
3. EQUIPMENT LIST AND CALIBRATION

3.1 Equipments List & Calibration Information

Equipment	Model	S/N	Calibration Date	Calibration Due Date
DASY5 Test Software	DASY52.10	N/A	NCR	NCR
DASY5 Measurement Server	DASY5 4.5.12	1567	NCR	NCR
Data Acquisition Electronics	DAE4	1493	2023/3/17	2024/3/16
E-Field Probe	ES3DV3	3157	2023/04/10	2024/04/09
Mounting Device	MD4HHTV5	BJPCTC0152	NCR	NCR
Twin SAM	Twin SAM V5.0	1412	NCR	NCR
Dipole, 2450 MHz	D2450V2	1102	2023/3/27	2026/3/26
Simulated Tissue Liquid Head(500-9500 MHz)	HBBL600-10000V6	220420-2	Each Time	/
Network Analyzer	8753B	2828A00170	2023/10/24	2024/10/23
Dielectric assessment kit	1319	SM DAK 040 CA	NCR	NCR
MXG Vector Signal Generator	N5182B	MY51350144	2023/3/31	2024/3/30
Power Meter	ML2495A	1106009	2023/8/4	2024/8/3
Pulse Power Sensor	MA2411A	10780	2023/8/4	2024/8/3
Power Amplifier	ZHL-5W-202-S+	416402204	NCR	NCR
Power Amplifier	ZVE-6W-83+	637202210	NCR	NCR
Directional Coupler	441493	520Z	NCR	NCR
Attenuator	20dB, 100W	LN749	NCR	NCR
Attenuator	6dB, 150W	2754	NCR	NCR
Thermometer	DTM3000	3892	2023/3/31	2024/3/30
Spectrum Analyzer	FSV40	101943	2023/3/31	2024/3/30

4. SAR MEASUREMENT SYSTEM VERIFICATION

4.1 Liquid Verification



Liquid Verification Setup Block Diagram

Liquid Verification Results

Frequency (MHz)	LiquidType	Liquid Parameter		Target Value		Delta (%)		Tolerance (%)
		ϵ_r	σ (S/m)	ϵ_r	σ (S/m)	$\Delta\epsilon_r$	$\Delta\sigma$	
2402	Simulated Tissue Liquid Head	40.392	1.767	39.26	1.75	2.88	0.97	± 5
2405	Simulated Tissue Liquid Head	40.142	1.783	39.26	1.75	2.25	1.89	± 5
2412	Simulated Tissue Liquid Head	40.491	1.765	39.25	1.76	3.16	0.28	± 5
2440	Simulated Tissue Liquid Head	40.192	1.777	39.21	1.79	2.5	-0.73	± 5
2442	Simulated Tissue Liquid Head	40.192	1.778	39.21	1.79	2.5	-0.67	± 5
2450	Simulated Tissue Liquid Head	40.133	1.779	39.20	1.80	2.38	-1.17	± 5
2472	Simulated Tissue Liquid Head	40.012	1.787	39.17	1.82	2.15	-1.81	± 5
2480	Simulated Tissue Liquid Head	40.102	1.813	39.09	1.867	2.59	-2.89	± 5

*Liquid Verification above was performed on 2024/01/29.

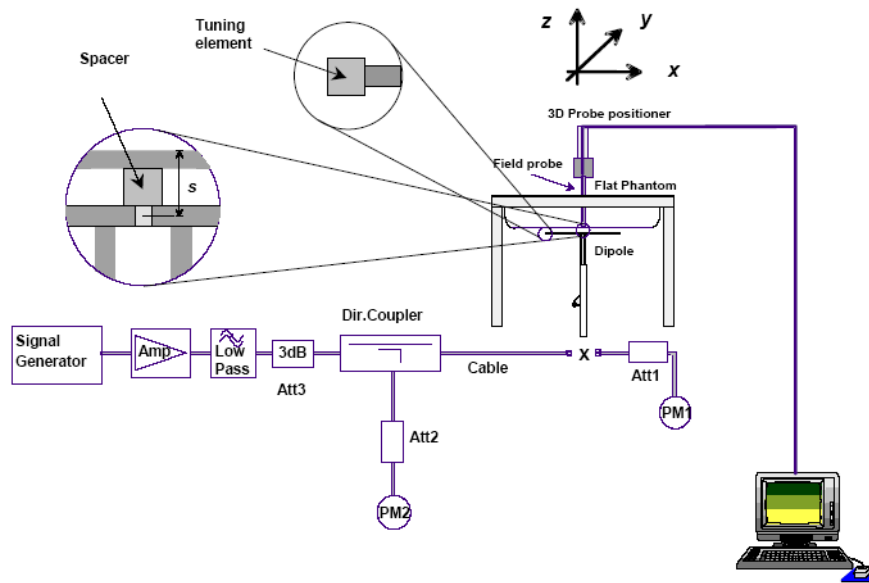
4.2 System Accuracy Verification

Prior to the assessment, the system validation kit was used to test whether the system was operating within its specifications of $\pm 10\%$. The validation results are tabulated below. And also the corresponding SAR plot is attached as well in the SAR plots files.

The spacing distances in the **System Verification Setup Block Diagram** is given by the following:

- a) $s = 15 \text{ mm} \pm 0,2 \text{ mm}$ for $300 \text{ MHz} \leq f \leq 1\,000 \text{ MHz}$;
- b) $s = 10 \text{ mm} \pm 0,2 \text{ mm}$ for $1\,000 \text{ MHz} < f \leq 3\,000 \text{ MHz}$;
- c) $s = 10 \text{ mm} \pm 0,2 \text{ mm}$ for $3\,000 \text{ MHz} < f \leq 6\,000 \text{ MHz}$.

System Verification Setup Block Diagram



System Accuracy Check Results

Date	Frequency Band	Liquid Type	Input Power (mW)	Measured SAR (W/kg)	Normalized to 1W (W/kg)	Target Value (W/kg)	Delta (%)	Tolerance (%)
2024/01/29	2450	Simulated Tissue Liquid Head	100	1g 5.34	53.4	50.9	4.912	± 10

*The SAR values above are normalized to 1 Watt forward power.

4.3 SAR SYSTEM VALIDATION DATA

System Performance 2450MHz was performed on 2024/01/29

DUT: D2450V2; Type: 2450 MHz; Serial: 1102

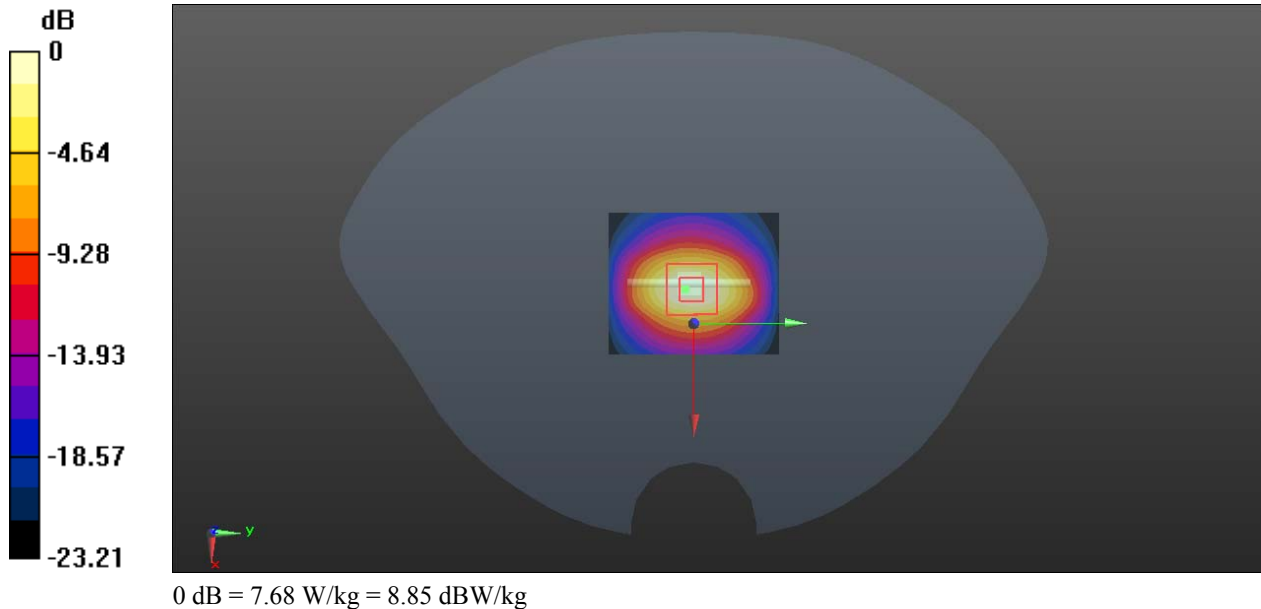
Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1
Medium parameters used: $f = 2450$ MHz; $\sigma = 1.779$ S/m; $\epsilon_r = 40.133$; $\rho = 1000$ kg/m³
Phantom section: Flat Section

DASY5 Configuration:

- Probe: ES3DV3 - SN3157; ConvF(4.74, 4.74, 4.74) @ 2450 MHz; Calibrated: 2023/4/10
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1493; Calibrated: 2023/3/17
- Phantom: Twin SAM; Type: Twin SAM V5.0; Serial: TP:1412
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7470)

Area Scan (6x7x1): Measurement grid: dx=12mm, dy=12mm
Maximum value of SAR (measured) = 8.36 W/kg

Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm
Reference Value = 53.24 V/m; Power Drift = 0.01 dB
Peak SAR (extrapolated) = 9.18 W/kg
SAR(1 g) = 5.34 W/kg; SAR(10 g) = 2.45 W/kg
Maximum value of SAR (measured) = 7.68 W/kg

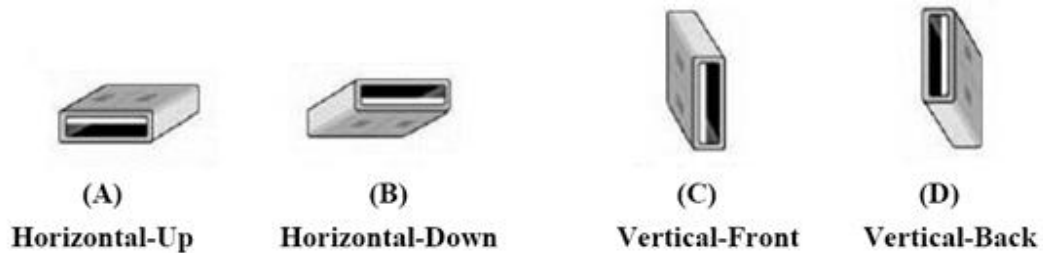


5. EUT TEST STRATEGY AND METHODOLOGY

5.1 SIMPLE DONGLE PROCEDURES

Test all USB orientations [see figure below: (A) Horizontal-Up, (B) Horizontal-Down, (C) Vertical-Front, and (D) Vertical-Back] with a device-to-phantom separation distance of 5 mm or less, according to KDB Publication 447498 D02 requirements. These test orientations are intended for the exposure conditions found in typical laptop/notebook/netbook or tablet computers with either horizontal or vertical USB connector configurations at various locations in the keyboard section of the computer. Current generation portable host computers should be used to establish the required SAR measurement separation distance. The same test separation distance must be used to test all frequency bands and modes in each USB orientation. The typical Horizontal-Up USB connection (A), found in the majority of host computers, must be tested using an appropriate host computer. A host computer with either Vertical-Front (C) or Vertical-Back (D) USB connection should be used to test one of the vertical USB orientations. If a suitable host computer is not available for testing the Horizontal-Down (B) or the remaining Vertical USB orientation, a high quality USB cable, 12 inches or less, may be used for testing these other orientations. It must be documented that the USB cable does not influence the radiating characteristics and output power of the transmitter.

When the antenna is located near the tip of a dongle, it may operate at closer proximity to users in certain connector orientations where dongle tip testing may be required.



Test Distance for SAR Evaluation

For this case the EUT(Equipment Under Test) is set 5mm away from the phantom, the test distance is 5mm.

5.6 SAR Evaluation Procedure

The evaluation was performed with the following procedure:

Step 1: Measurement of the SAR value at a fixed location above the ear point or central position was used as a reference value for assessing the power drop. The SAR at this point is measured at the start of the test and then again at the end of the testing.

Step 2: The SAR distribution at the exposed side of the head was measured at a distance of 4 mm from the inner surface of the shell. The area covered the entire dimension of the head or radiating structures of the EUT, the horizontal grid spacing was 15 mm x 15 mm, and the SAR distribution was determined by integrated grid of 1.5mm x 1.5mm. Based on these data, the area of the maximum absorption was determined by spline interpolation. The first Area Scan covers the entire dimension of the EUT to ensure that the hotspot was correctly identified.

Step 3: Around this point, a volume of 30 mm x 30 mm x 30 mm was assessed by measuring 7x 7 x 7 points. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

1) The data at the surface were extrapolated, since the center of the dipoles is 1.2 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip.

2) The maximum Measured value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 3D-Spline interpolation algorithm. The 3D-Spline is composed of three one dimensional splines with the "Not a knot"-condition (in x, y and z-directions). The volume was integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were Measured to calculate the averages.

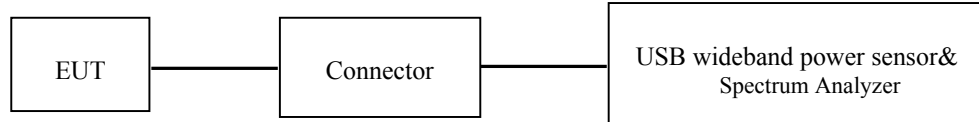
All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.

Step 4: Re-measurement of the SAR value at the same location as in Step 1. If the value changed by more than 5%, the evaluation was repeated.

6. CONDUCTED OUTPUT POWER MEASUREMENT

6.1 Test Procedure

The RF output of the transmitter was connected to the input of the Wireless Communication through Connector.



WLAN/ Bluetooth/Zigbee

6.3 Maximum Target Output Power

Max Target Power(dBm)			
Mode/Band	Channel		
	Low	Middle	High
2.4G WiFi	16.0	16.0	16.0
BLE	12.0	12.0	12.0
Zigbee/Thread	10.0	10.0	10.0

6.4 Test Results:**WLAN 2.4G:**

Mode	Channel frequency (MHz)	Duty cycle (%)	Maximum Conducted Average Output Power (dBm)
802.11b	2412	100	13.68
	2442		15.42
	2472		15.90
802.11g	2412		12.24
	2442		14.12
	2472		14.62
802.11n ht20	2412		11.14
	2442		12.88
	2472		13.55
802.11n ht40	2422		12.88
	2442		13.97
	2462		15.11
802.11ax20	2412		12.24
	2442		14.04
	2472		14.67

Bluetooth:

Mode	Channel frequency (MHz)	Duty cycle (%)	RF Output Power (dBm)
BLE 1M	2402	100	10.44
	2440		11.01
	2480		11.44
BLE 2M	2402		10.57
	2440		11.14
	2480		11.61

Zigbee/Thread:

Mode	Channel frequency (MHz)	Duty cycle (%)	RF Output Power (dBm)
Zigbee	2405	97.26	8.64
	2440		9.77
	2480		9.58
Thread	2405	97.5	9.04
	2440		9.77
	2480		9.92

7. Standalone SAR test exclusion considerations

7.2 Standalone SAR test exclusion considerations

Mode	Frequency (MHz)	Output Power (dBm)	Output Power (mW)	Distance (mm)	Calculated value	Threshold (1-g)	SAR Test Exclusion
WLAN 2.4G	2472	16.0	39.81	0	12.5	3.0	No
BLE	2480	12.0	15.85	0	5.0	3.0	No
Zigbee/Thread	2480	10.0	10.00	0	3.1	3.0	No

Note: The Wi-Fi based average power for calculation, The bluetooth based peak power for calculation.

NOTE:

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot$

$[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

1. $f(\text{GHz})$ is the RF channel transmit frequency in GHz.

2. Power and distance are rounded to the nearest mW and mm before calculation.

3. The result is rounded to one decimal place for comparison.

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

According to KDB 447498 D01 General RF Exposure Guidance v06, clause 4.3. General SAR test exclusion guidance:

c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):

- 1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100/f(\text{MHz}))]$
- 2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$
- 3) SAR measurement procedures are not established below 100 MHz.

8. SAR MEASUREMENT RESULTS

This page summarizes the results of the performed dosimetric evaluation.

8.1 SAR Test Data

Environmental Conditions

Temperature:	22.5-23.8°C
Relative Humidity:	58%
ATM Pressure:	100.9kPa
Test Date:	2024/01/29

Testing was performed by Wen Chen, Leo Lu, Aixlee Li.

2.4G Wi-Fi:

Test Mode	EUT Position	Frequency (MHz)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/Kg), Limited=1.6 W/kg				
					Scaled Factor	Duty Cycle (%)	Meas.	Scaled SAR	Plot
802.11b	Horizontal-UP (5mm)	2412	/	/	/	/	/	/	/
		2442	15.42	16.0	1.143	100	0.023	0.03	1#
		2472	/	/	/	/	/	/	/
	Horizontal-Down (5mm)	2412	/	/	/	/	/	/	/
		2442	15.42	16.0	1.143	100	0.016	0.02	2#
		2472	/	/	/	/	/	/	/
	Vertical-Front (5mm)	2412	/	/	/	/	/	/	/
		2442	15.42	16.0	1.143	100	0.057	0.07	3#
		2472	/	/	/	/	/	/	/
	Vertical-Back (5mm)	2412	/	/	/	/	/	/	/
		2442	15.42	16.0	1.143	100	0.038	0.04	4#
		2472	/	/	/	/	/	/	/
	Tip (5mm)	2412	/	/	/	/	/	/	/
		2442	15.42	16.0	1.143	100	0.038	0.04	5#
		2472	/	/	/	/	/	/	/

BLE:

Test Mode	EUT Position	Frequency (MHz)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/Kg), Limited=1.6 W/kg				
					Scaled Factor	Duty Cycle (%)	Meas.	Scaled SAR	Plot
BLE	Horizontal-UP (5mm)	2402	/	/	/	/	/	/	/
		2440	11.01	12.0	1.256	100	0.022	0.03	6#
		2480	/	/	/	/	/	/	/
	Horizontal-Down (5mm)	2402	/	/	/	/	/	/	/
		2440	11.01	12.0	1.256	100	0.033	0.04	7#
		2480	/	/	/	/	/	/	/
	Vertical-Front (5mm)	2402	/	/	/	/	/	/	/
		2440	11.01	12.0	1.256	100	0.031	0.04	8#
		2480	/	/	/	/	/	/	/
	Vertical-Back (5mm)	2402	/	/	/	/	/	/	/
		2440	11.01	12.0	1.256	100	0.017	0.02	9#
		2480	/	/	/	/	/	/	/
	Tip (5mm)	2402	/	/	/	/	/	/	/
		2440	11.01	12.0	1.256	100	0.025	0.03	10#
		2480	/	/	/	/	/	/	/

Zigbee/Thread:

Test Mode	EUT Position	Frequency (MHz)	Max. Meas. Power (dBm)	Max. Rated Power (dBm)	1g SAR (W/Kg), Limited=1.6 W/kg				
					Scaled Factor	Duty Cycle (%)	Meas.	Scaled SAR	Plot
Thread	Horizontal-UP (5mm)	2405	/	/	/	/	/	/	/
		2440	9.77	10.0	1.054	97.26	0.00891	0.01	11#
		2480	/	/	/	/	/	/	/
	Horizontal-Down (5mm)	2405	/	/	/	/	/	/	/
		2440	9.77	10.0	1.054	97.26	0.014	0.01	12#
		2480	/	/	/	/	/	/	/
	Vertical-Front (5mm)	2405	/	/	/	/	/	/	/
		2440	9.77	10.0	1.054	97.26	0.011	0.01	13#
		2480	/	/	/	/	/	/	/
	Vertical-Back (5mm)	2405	/	/	/	/	/	/	/
		2440	9.77	10.0	1.054	97.26	0.010	0.01	14#
		2480	/	/	/	/	/	/	/
	Tip (5mm)	2405	/	/	/	/	/	/	/
		2440	9.77	10.0	1.054	97.26	0.00275	0.01	15#
		2480	/	/	/	/	/	/	/

Note:

1. When the SAR value is less than half of the limit, testing for other channels are optional.
2. When SAR or MPE is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance.
3. According 2016 Oct. TCB, for SAR testing of 802.11b 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)".
4. The USB cable used for test does not affect the radiation characteristics and transmitting power of the transmitter, and the USB cable used for the test was less than 12 inches.
5. Need to test the tip of the dongle if antenna is 1cm or closer to the tip.

9. Measurement Variability

In accordance with published RF Exposure KDB procedure 865664 D01 SAR measurement 100 MHz to 6 GHz v01. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

Note: The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

The Highest Measured SAR Configuration in Each Frequency Band

Body

SAR probe calibration point	Frequency Band	Freq.(MHz)	EUT Position	Meas. SAR (W/kg)		Largest to Smallest SAR Ratio
				Original	Repeated	
/	/	/	/	/	/	/

Note:

1. Second Repeated Measurement is not required since the ratio of the largest to smallest SAR for the original and first repeated measurement is not > 1.20 .
2. The measured SAR results **do not** have to be scaled to the maximum tune-up tolerance to determine if repeated measurements are required.
3. SAR measurement variability must be assessed for each frequency band, which is determined by the **SAR probe calibration point and tissue-equivalent medium** used for the device measurements.

10. SAR SIMULTANEOUS TRANSMISSION DESCRIPTION

Simultaneous Transmission:

Description of Simultaneous Transmit Capabilities	
Transmitter Combination	Simultaneous?
WLAN + BLE + Zigbee	×

Note:

SAR simultaneous transmission does not exist

11. SAR Plots

Please Refer to the Attachment.

APPENDIX A MEASUREMENT UNCERTAINTY

The uncertainty budget has been determined for the measurement system and is given in the following Table.

Measurement uncertainty evaluation for IEEE1528-2013 SAR test

Source of uncertainty	Tolerance/uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
Measurement system							
Probe calibration	6.55	N	1	1	1	6.3	6.3
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
RF ambient conditions – reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
Test sample related							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	6.3	N	1	1	1	6.3	6.3
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
Phantom and set-up							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Liquid conductivity target)	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2
Liquid conductivity meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity target)	5.0	R	$\sqrt{3}$	0.6	0.49	1.7	1.4
Liquid permittivity meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.1	23.7

Measurement uncertainty evaluation for IEC62209-1 SAR test

Source of uncertainty	Tolerance/uncertainty ± %	Probability distribution	Divisor	ci (1 g)	ci (10 g)	Standard uncertainty ± %, (1 g)	Standard uncertainty ± %, (10 g)
Measurement system							
Probe calibration	6.55	N	1	1	1	6.3	6.3
Axial Isotropy	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Hemispherical Isotropy	9.6	R	$\sqrt{3}$	0	0	0.0	0.0
Boundary effect	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Linearity	4.7	R	$\sqrt{3}$	1	1	2.7	2.7
Detection limits	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Readout electronics	0.3	N	1	1	1	0.3	0.3
Response time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
Integration time	0.0	R	$\sqrt{3}$	1	1	0.0	0.0
RF ambient conditions – noise	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Probe positioning with respect to phantom shell	6.7	R	$\sqrt{3}$	1	1	3.9	3.9
Probe positioner mech. Restrictions	0.8	R	$\sqrt{3}$	1	1	0.5	0.5
RF ambient conditions– reflections	1.0	R	$\sqrt{3}$	1	1	0.6	0.6
Post-processing	2.0	R	$\sqrt{3}$	1	1	1.2	1.2
Test sample related							
Test sample positioning	2.8	N	1	1	1	2.8	2.8
Device holder uncertainty	6.3	N	1	1	1	6.3	6.3
Drift of output power	5.0	R	$\sqrt{3}$	1	1	2.9	2.9
Phantom and set-up							
Phantom uncertainty (shape and thickness tolerances)	4.0	R	$\sqrt{3}$	1	1	2.3	2.3
Liquid conductivity target)	5.0	R	$\sqrt{3}$	0.64	0.43	1.8	1.2
Liquid conductivity meas.)	2.5	N	1	0.64	0.43	1.6	1.1
Liquid permittivity target)	5.0	R	$\sqrt{3}$	0.6	0.49	1.7	1.4
Liquid permittivity meas.)	2.5	N	1	0.6	0.49	1.5	1.2
Combined standard uncertainty		RSS				12.2	12.0
Expanded uncertainty 95 % confidence interval)						24.0	23.6

APPENDIX B EUT TEST POSITION PHOTOS

Please Refer to the Attachment.

APPENDIX C CALIBRATION CERTIFICATES

Please Refer to the Attachment.

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