



REPORT No.: SZ21040408S01

# TEST REPORT

**APPLICANT** : Anker Innovations Limited  
**PRODUCT NAME** : Nebula Capsule II  
**MODEL NAME** : D2421  
**BRAND NAME** : NEBULA  
**FCC ID** : 2AOKB-D2421X  
**STANDARD(S)** : FCC 47 CFR Part 2(2.1093)  
**RECEIPT DATE** : 2018-12-06  
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Change History		
Version	Date	Reason for change
1.0	2022-08-05	First edition



# 1 SAR Results Summary

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

Frequency Band		Highest SAR Summary
		Body (Separation 0mm)
WLAN	2.4GHz WLAN	0.044
	5GHz WLAN	0.093

Max Scaled SAR <sub>1g</sub> (W/Kg)	Body:	0.093W/kg	Limit(W/kg):1.6W/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 IEEE C95.1-1991), 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

<b>Applicant:</b>	Anker Innovations Limited
<b>Applicant Address:</b>	Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, Hong Kong
<b>Manufacturer:</b>	Anker Innovations Limited
<b>Manufacturer Address:</b>	Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, Hong Kong

### 2.2 Equipment under Test (EUT) Description

<b>EUT Type:</b>	Nebula Capsule II
<b>Product Serial No.:</b>	4#
<b>Hardware Version:</b>	A277C
<b>Software Version:</b>	V0.0.06
<b>Operation Frequency:</b>	WLAN 2.4GHz: 2412 MHz~2462 MHz WLAN 5.2GHz: 5180 MHz~5240 MHz WLAN 5.8GHz: 5745 MHz~5825 MHz Bluetooth: 2402 MHz ~2480 MHz
<b>Modulation technology:</b>	802.11 b: DSSS 802.11 a/g/n/ac: OFDM BR+EDR: GFSK, $\pi/4$ -DQPSK, 8-DPSK BLE: GFSK
<b>Antenna Type:</b>	FPC Antenna
<b>Antenna Gain:</b>	2.4G:2.84dBi; 5G:3.04dBi; BT 1:2.84dBi BT 2:1.38dBi



## 2.3 Accessories Information

<b>Battery 1:</b>	Manufacturer:	Anker Innovations Limited
	Brand Name:	N.A
	Model:	INR21700M50T(21CR22/71)
	Capacity:	4850 mAh
	Rated Voltage:	7.26 V
<b>Battery 2:</b>	Manufacturer:	Anker Innovations Limited
	Brand Name:	N.A
	Model:	LR2170SD-2S1P
	Capacity:	4850 mAh
	Rated Voltage:	7.2 V

**Note:**

1. This report was updated on the basis of the original report SZ18110335S01, all of the parameters are the same as the original report except as follow:

- 1) Changed the brand and FCC ID.
- 2) Delete A2014 adapter.
- 3) Modify the company information of the main supplier battery manufacturer.
- 4) Add a new battery.
- 5) Replace the T835 Bluetooth module.
- 6) Modify the hardware version number.

Therefore the new battery SAR measurements of the worst condition should be verified and the latest results recorded in this report. The other test results in this report still refer to the original test report.

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



## 2.4 Environment of Test Site

<b>Temperature:</b>	18°C ~25°C
<b>Humidity:</b>	35%~75% RH
<b>Atmospheric Pressure:</b>	1010 mbar

<b>Normal Temperature (NT):</b>	20 ... 25 °C
<b>Relative Humidity:</b>	30 ... 75 %
<b>Air Pressure:</b>	980 ... 1020 hPa
<b>Test Frequency:</b>	WLAN 2.4GHz; WLAN 5GHz;
<b>Operation Mode:</b>	Call established
<b>Power Level:</b>	WLAN 2.4GHz Maximum output power WLAN 5GHz 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/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

### 3.2 SAR Definition

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

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

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

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

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

Where: C is the specific heat capacity,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the electrical field in the tissue by

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

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

### 4.3 RF Exposure Limits

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

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20





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**Note:**

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





## 4.4 Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Method Determination /Remark
FCC 47CFR Part 2(2.1093)	Radio Frequency Radiation Exposure Evaluation: Portable Devices	No deviation
KDB 447498 D04v01	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 941225 D06v02r01	SAR Evaluation Procedures For Portable Devices With Wireless Router Capabilities	No deviation
<p><b>Note 1:</b> The test item is not applicable.</p> <p><b>Note 2:</b> 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.</p>		



## 5 SAR Measurement System

### 5.1 SAR Measurement System for SATIMO

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.



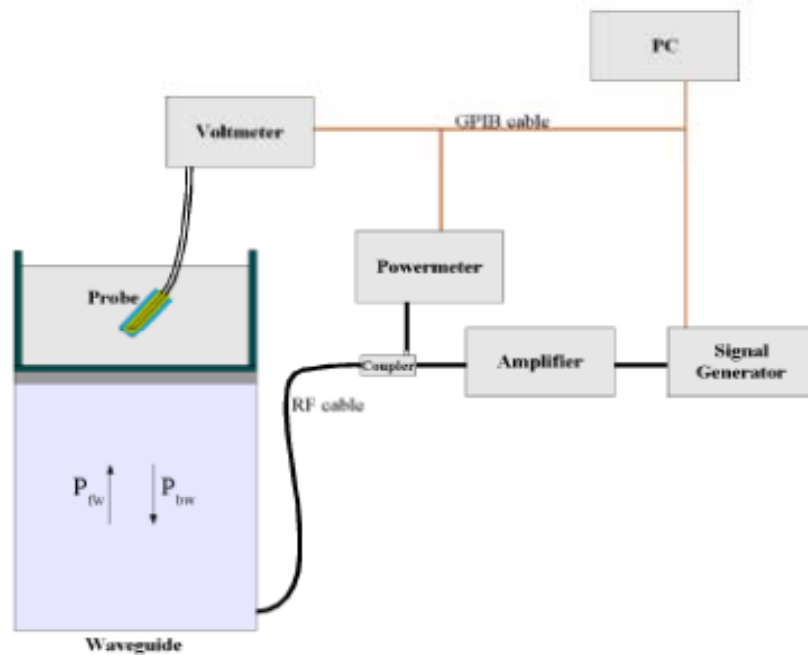
### ➤ E-Field Probe

For the measurements the Specific Dosimetric E-Field Probe SN 37/08 EP80 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 6.5 mm
- Distance between probe tip and sensor center: 2.5mm
- Distance between sensor center and the inner phantom surface: 4 mm
- (repeatability better than +/- 1mm)
- Probe linearity: <0.25 dB
- Axial Isotropy: <0.25 dB
- Spherical Isotropy: <0.25 dB
- Calibration range: 835 to 2500MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and surface normal line: less than 30°

Probe calibration is realized, in compliance with CENELEC EN 62209 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 622091 annexe technique using reference guide at the five frequencies.



$$SAR = \frac{4(P_{fw} - P_{bw})}{ab\delta} \cos^2\left(\pi \frac{y}{a}\right) c^{(2z/\delta)}$$

Where :

P<sub>fw</sub> = Forward Power

P<sub>bw</sub> = Backward Power





a and b = Waveguide dimensions

l = Skin depth

Keithley configuration:

Rate = Medium; Filter =ON; RDGS=10; FILTER TYPE =MOVING AVERAGE; RANGE AUTO

After each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors, CF(N), for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N)=SAR(N)/Vlin(N) \quad (N=1,2,3)$$

The linearised output voltage Vlin(N) is obtained from the displayed output voltage V(N) using

$$Vlin(N)=V(N)*(1+V(N)/DCP(N)) \quad (N=1,2,3)$$

where DCP is the diode compression point in mV.

### Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm<sup>2</sup>) using an with CALISAR, Antenna proprietary calibration system.

### Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1 mW/cm<sup>2</sup>.

### Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulating head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

Where:

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

$\delta t$  = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

$\delta T$  = temperature increase due to RF exposure.

SAR is proportional to  $\Delta T/\Delta t$ , the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.



Where:

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

$\sigma$  = simulated tissue conductivity,

$\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

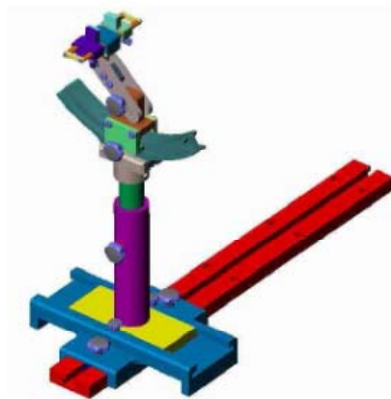
$\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

### ➤ Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

### ➤ Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1°.

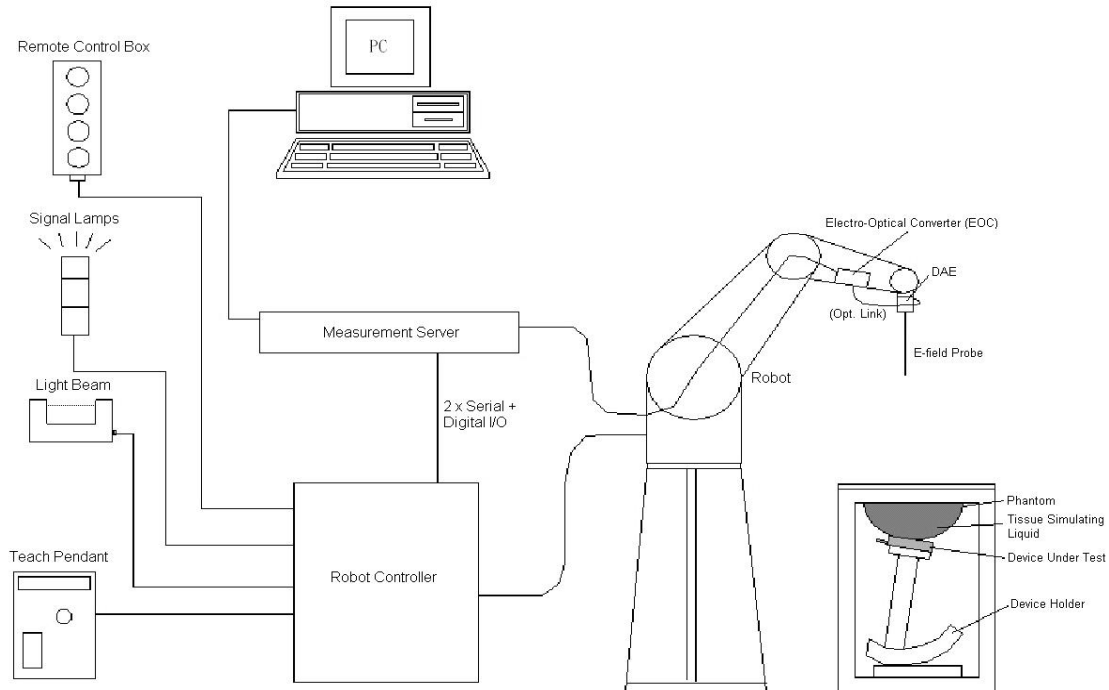


Device holder

System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005



## 5.2 SAR Measurement System for DASY 5



**Fig 5.1 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.





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>


<b>Construction</b>	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)	
<b>Frequency</b>	10 MHz to 3 GHz; Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.2$ dB in HSL (rotation around probe axis) $\pm 0.4$ dB in HSL (rotation normal to probe axis)	
<b>Dynamic Range</b>	5 $\mu$ W/g to 100 mW/g; Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	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 5.2 Photo of ES3DV3

#### <EX3DV4 Probe>


<b>Construction</b>	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
<b>Frequency</b>	10 MHz to 6 GHz; Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.3$ dB in HSL (rotation around probe axis) $\pm 0.5$ dB in tissue material (rotation normal to probe axis)	
<b>Dynamic Range</b>	10 $\mu$ W/g to 100 mW/g; Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	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 5.3 Photo of EX3DV4



- **E-Field Probe Calibration**

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

- **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 fast16 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 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



**Fig 5.4 Photo of DAE**

- **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  $\pm 0.035$  mm)

High reliability (industrial design)

Jerk-free straight movements

Low ELF interference (the closed metallic construction shields against motor control fields)



**Fig 5.5 Photo of DASY5**

- **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 5.6 Photo of Server for DASY5**

### ● 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. 5.7 Photo of Light Beam**

### ➤ Phantom

#### <SAM Twin Phantom>

<b>Shell Thickness</b>	2 ± 0.2 mm (sagging: <1%) Center ear point: 6 ± 0.2 mm
<b>Filling Volume</b>	Approx. 25 liters
<b>Dimensions</b>	Length: 1000 mm; Width: 500 mm; Height: adjustable feet
<b>Measurement Areas</b>	Left Head, Right Head, Flat Phantom



**Fig. 5.8 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.



## ➤ Device Holder

### <Device Holder for SAM Twin Phantom>

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of  $\pm 0.5$  mm would produce a SAR uncertainty of  $\pm 20$  %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (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 5.9 Device Holder

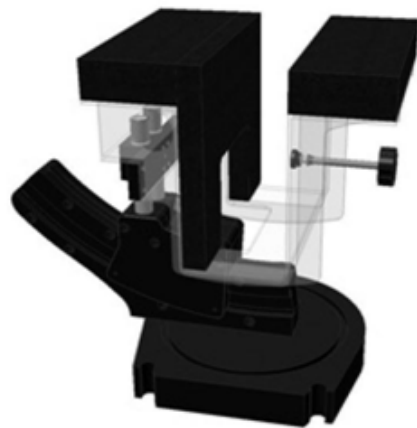


Fig 5.10 Laptop Extension Kit

## ➤ 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.

<b>Probe parameters:</b>	- Sensitivity	Normi, ai0, ai1, ai2
	- Conversion factor	ConvFi
	- Diode compression point	dcpi
<b>Device parameters:</b>	- Frequency	f
	- Crest factor	cf
<b>Media parameters:</b>	- Conductivity	$\sigma$
	- Density	$\rho$

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<sub>i</sub> = 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  $i$ , ( $i = x, y, z$ )  
 $\text{Norm}_i$  = sensor sensitivity of channel  $i$ , ( $i = x, y, z$ ),  $\mu\text{V}/(\text{V/m})^2$  for E-field Probes  $\text{ConvF}$  = 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  $\text{SAR}$  = local specific absorption rate in mW/g  
 $E_{\text{tot}}$  = total field strength in V/m  
 $\sigma$  = conductivity in [mho/m] or [Siemens/m]  
 $\rho$  = equivalent tissue density in g/cm<sup>3</sup>

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







### 5.3 Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial No./ SW Version	Calibration	
				Last Cal.	Due Date
SATIMO	2450MHz System Validation Kit	D2450V2	30/13 DIP2G450-263	2018.05.10	2019.05.09
SATIMO	5000-6000MHz System Validation Kit	D5GHz	41/12 WGA21	2018.05.10	2019.05.09
SPEAG	5000MHz System Validation Kit	D5GHzV2	1176	2021.12.19	2024.12.18
SPEAG	DOSIMETRIC ASSESSMENT SYSTEM	DASY52	52.10.4.1527	NCR	NCR
SATIMO	Dosimetric E-Field Probe	N/A	37/08 EP80	2018.05.10	2019.05.09
SATIMO	Dosimetric E-Field Probe	N/A	37/13 EPG193	2018.05.10	2019.05.09
SPEAG	Dosimetric E-Field Probe	EX3DV4	3753	2021.07.26	2022.07.25
SPEAG	Data Acquisition Electronics	DAE4	1643	2021.12.30	2022.12.29
Keithley	Voltmeter	2000	1000572	2018.05.10	2019.05.09
SATIMO	SAM Twin Phantom 2	N/A	SN_36_08_SAM62	NCR	NCR
SPEAG	SAM Twin Phantom 2	QD 000 P40 CB	TP-1464	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Agilent	Network Analyzer	E5071B	MY42404762	2022.03.01	2023.02.28
Speag	Dielectric Assessment KIT	DAK-3.5	1279	2021.10.18	2022.10.17
R&S	Network Emulator	CMW500	124534	2018.04.17	2019.04.16
Agilent	Network Emulator	8960	10752	2018.04.17	2019.04.16
Agilent	Network Analyzer	E5071B	MY42404762	2018.04.17	2019.04.16
Agilent	Dielectric Probe Kit	85033E	N/A	2018.04.17	2019.04.16
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
mini-circuits	Amplifier	ZVE-8G+	754401735	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2018.04.17	2019.04.16
Agilent	Power Meter	E4416A	MY45102093	2018.04.17	2019.04.16
Agilent	Power Sensor	N8482A	MY41090849	2018.04.17	2019.04.16
R&S	Power Meter	NRVD	101066	2018.04.17	2019.04.16
Anritsu	Power Sensor	MA2411B	N/A	2018.04.17	2019.04.16
Agilent	Dual Directional Coupler	778D	50422	NA	NA
Agilent	Dual Directional Coupler	778D	50422	NA	NA
Agilent	Dual Directional Coupler	778D	50422	NA	NA





Agilent	Dual Directional Coupler	778D	50422	NA	NA
Giga-tronics	Directional coupler	N/A	1829112	NA	NA
MCL	Attenuation1	6dBm	351-218-010	NA	NA
MCL	Attenuation 1	351-218-010	N/A	NA	NA
R&S	Spectrum Analyzer	N9030A	MY54170556	2021.10.20	2022.10.19
KTJ	Thermo meter	TA298	N/A	2021.12.21	2022.12.20
N/A	Tissue Simulating Liquids	Body 800-2600 MHz		Within 24H	
SPEAG	Tissue Simulating Liquids	HBBL600-10000V6		24H	
THERMOME TER	Thermo meter	Mode-01	N/A	2018.04.25	2019.04.24

**Note:**

1. The calibration certificate of DASY can be referred to appendix E 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.





## 6 Tissue Simulating Liquids

For the measurement of the field distribution inside the phantom, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 6.1, for body SAR testing, the liquid height from the center of the flat phantom to liquid top surface is larger than 15 cm, which is shown in Fig. 6.2.

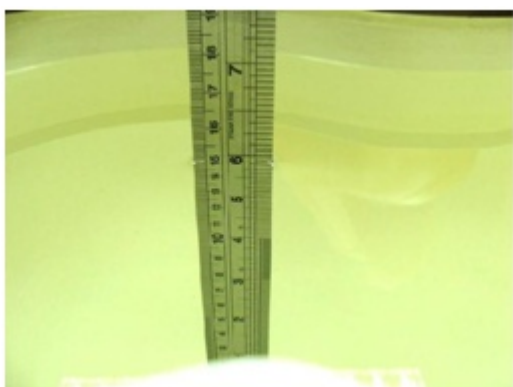


Fig 6.1 Photo of Liquid Height for Head SAR



Fig 6.2 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 ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
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%





## Recipes for Tissue Simulating Liquid

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

The following table shows the measuring results for simulating liquid.

Frequency (MHz)	Real part of the complex relative permittivity, $\epsilon'$	Conductivity, $\sigma$ (S/m)
30	55.0	0.75
150	52.3	0.76
300	45.3	0.87
450	43.5	0.87
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1800	40.0	1.40
1900	40.0	1.40
1950	40.0	1.40
2000	40.0	1.40
2100	39.8	1.49
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40
4000	37.4	3.43
5000	36.2	4.45
5200	36.0	4.65
5400	35.8	4.86
5600	35.5	5.06
5800	35.4	5.27
6000	35.1	5.48





The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using an Agilent 85033E Dielectric Probe Kit and an Agilent Network Analyzer.

The following table shows the measuring results for simulating liquid.

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Conductivity ( $\sigma$ )	Conductivity Target ( $\sigma$ )	Delta ( $\sigma$ ) (%)	Limit (%)	Date
2450	MSL	22.2	1.965	1.95	0.77	±5	2019.03.18
5200	MSL	22.8	5.543	5.30	4.58	±5	2019.03.18
5800	MSL	22.8	5.943	6.00	-0.95	±5	2019.03.18
5750	HSL	22.1	5.011	5.22	-4.00	±5	2022.06.29

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Permittivity ( $\epsilon_r$ )	Permittivity Target ( $\epsilon_r$ )	Delta ( $\epsilon_r$ ) (%)	Limit (%)	Date
2450	MSL	22.2	52.874	52.70	0.33	±5	2019.03.18
5200	MSL	22.8	48.993	49.00	-0.01	±5	2019.03.18
5800	MSL	22.8	48.093	48.20	-0.22	±5	2019.03.18
5750	HSL	22.1	36.158	35.35	2.29	±5	2022.06.29



## 7 SAR System Verification

### ➤ Purpose of System Performance check

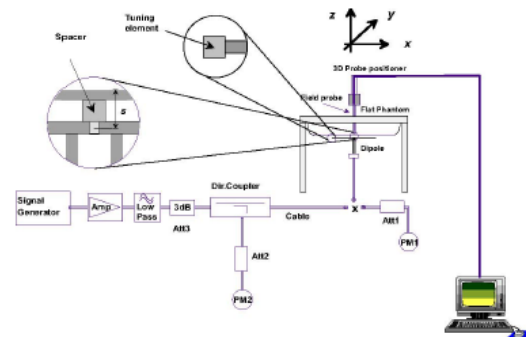
The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system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

## ➤ System Setup

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 7.1 Photo of Dipole Setup**



**Fig 7.2 System Setup for System Evaluation**



**➤ 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
2450	MSL	100	30/13 DIP2G450-263	37/08 EP80	N/A
5200	MSL	100	SN 41/12 WGA21-5200	37/13 EPG193	N/A
5750	HSL	100	D5GHzV2-1176-5750	3753	1643
5800	MSL	100	SN 41/12 WGA21-5800	37/13 EPG193	N/A

**<System Validation>**

Frequency (MHz)	Tissue Type	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	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

Frequency (MHz)	Tissue Type	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	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





## &lt;Validation Results&gt;

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2019.03.18	2450	MSL	100	5.08	50.93	50.83	-0.20
2019.03.18	5200	MSL	100	16.29	163.36	162.85	-0.31
2019.03.18	5800	MSL	100	17.69	177.10	176.85	-0.14
2022.06.28	5750	HSL	100	8.24	78.70	82.4	4.70

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2019.03.18	2450	MSL	100	2.38	23.26	23.78	2.24
2019.03.18	5200	MSL	100	5.63	57.09	56.32	-1.35
2019.03.18	5800	MSL	100	5.97	59.95	59.73	-0.37
2022.06.28	5750	HSL	100	2.31	22.50	23.1	2.67

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



## 8 EUT Testing Position

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

### 8.1 SAR Evaluations near the Mouth/Jaw Regions of the SAM Phantom

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

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

### 8.2 Body Worn Accessory Configurations

- To position the device parallel to the phantom surface with either keypad up or down.
- To adjust the device parallel to the flat phantom.
- To adjust the distance between the device surface and the flat phantom to 10 mm or holster surface and the flat phantom to 0 mm.

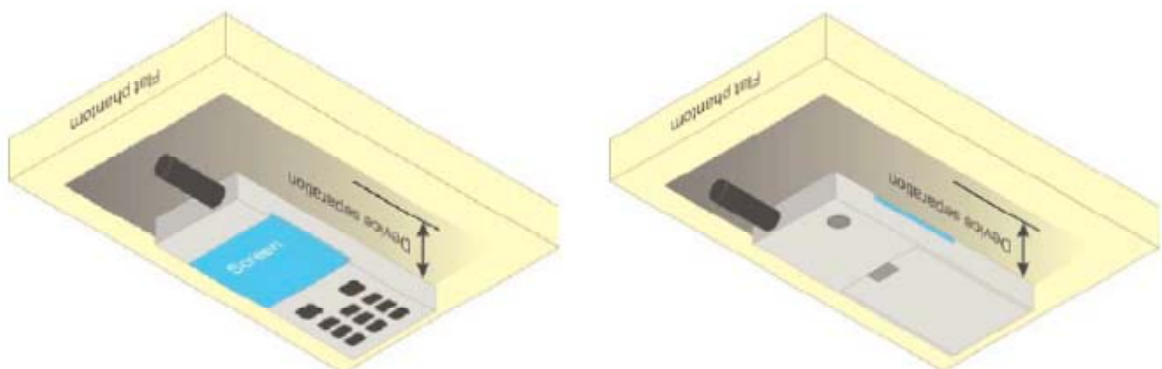


Fig.9.5 Illustration for Body Worn Position





## 9 Measurement Procedures

The measurement procedures are as follows:

### <Conducted power measurement>

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

### <Conducted power measurement>

- 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.
- Place the EUT in positions as Appendix B demonstrates.
- Measure SAR results for the highest power channel on each testing position.
- Find out the largest SAR result on these testing positions of each band.
- Measure SAR results for other channels in worst SAR testing position if the Reported SAR or highest power channel is larger than 0.8 W/kg.

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

- Power reference measurement
- Area scan
- Zoom scan

### 9.1 Power Reference Measurement

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



## 9.2 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  $10\text{mm}^2$  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 found in 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, EN 50361 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan).

## 9.3 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  $1000\text{ kg/m}^3$  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  $5\text{mm} \times 7\text{mm} \times 5\text{mm}$  providing a volume of 32mm in the X & Y axis, and 30mm in the Z axis.

## 9.4 SAR Averaged Methods

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



## 10 SAR Test Procedure

### 10.1 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.

			$\leq 3$ 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: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$			$\leq 2$ GHz: $\leq 15$ mm 2 – 3 GHz: $\leq 12$ mm	3 – 4 GHz: $\leq 12$ mm 4 – 6 GHz: $\leq 10$ 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: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			$\leq 2$ GHz: $\leq 8$ mm 2 – 3 GHz: $\leq 5$ mm*	3 – 4 GHz: $\leq 5$ mm* 4 – 6 GHz: $\leq 4$ mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		$\leq 5$ mm	3 – 4 GHz: $\leq 4$ mm 4 – 5 GHz: $\leq 3$ mm 5 – 6 GHz: $\leq 2$ mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4$ mm	3 – 4 GHz: $\leq 3$ mm 4 – 5 GHz: $\leq 2.5$ mm 5 – 6 GHz: $\leq 2$ mm
		$\Delta z_{\text{Zoom}}(n>1)$ : between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$ mm	
Minimum zoom scan volume	x, y, z		$\geq 30$ mm	3 – 4 GHz: $\geq 28$ mm 4 – 5 GHz: $\geq 25$ mm 5 – 6 GHz: $\geq 22$ mm
Note: $\delta$ 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 $\leq 1.4$ W/kg, $\leq 8$ mm, $\leq 7$ mm and $\leq 5$ mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				



## 10.2 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.

## 10.3 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.

## 10.4 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 form 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.



## 11 SAR Test Configuration

### <WLAN 2.4GHz>

1. SAR is measured for 2.4 GHz 802.11b DSSS using either the fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:
  - a. When the reported SAR of the highest measured maximum output power channel for the exposure configuration is  $\leq 0.8$  W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
  - b. When the reported SAR is  $> 0.8$  W/kg, SAR is required for that position using the next highest measured output power channel. When any reported SAR is  $> 1.2$  W/kg, SAR is required for the third channel; i.e., all channels require testing.
2. 2.4 GHz 802.11 g/n OFDM are additionally evaluated for SAR if the highest reported SAR for 802.11b, adjusted by the ratio of the OFDM to DSSS specified maximum output power, is  $> 1.2$  W/kg. When SAR is required for OFDM modes in 2.4 GHz band, the Initial Test configuration Procedures should be followed.
3. For held-to-ear and hotspot operations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When reported SAR for the initial test position is  $\leq 0.4$  W/kg, no additional testing for the remaining test positions was required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is  $\leq 0.8$  W/kg or all test positions are measured.
4. Justification for test configurations for WLAN per KDB Publication 248227 D02DR02-41929 for 2.4 GHz Wi-Fi single transmission chain operations, the highest measured maximum output power channel for DSSS was selected for SAR measurement. SAR for OFDM modes (2.4 GHz 802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSS SAR.
5. A fixed level power reduction is applied for WiFi when handset operates "held to the body" condition or "held to the ear" condition, the power reduction triggered by audio receiver detection and call establish status.
6. Per KDB 248227 D01v02r02, In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. SAR is not required for the following 2.4 GHz OFDM conditions:
  - a. When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
  - b. When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.



**<WLAN 5GHz>****A) U-NII-1 and U-NII-2A Bands**

For devices that operate in only one of the U-NII-1 and U-NII-2A bands, the normally required SAR procedures for OFDM configurations are applied. For devices that operate in both U-NII bands using the same transmitter and antenna(s), SAR test reduction is determined according to the following:

1. When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest reported SAR for a test configuration is  $\leq 1.2$  W/kg, SAR is not required for U-NII-1 band for that configuration (802.11 mode and exposure condition); otherwise, both bands are tested independently for SAR.
2. When different maximum output power is specified for the bands, begin SAR measurement in the band with higher specified maximum output power. The highest reported SAR for the tested configuration is adjusted by the ratio of lower to higher specified maximum output power for the two bands. When the adjusted SAR is  $\leq 1.2$  W/kg, SAR is not required for the band with lower maximum output power in that test configuration; otherwise, both bands are tested independently for SAR.
3. The two U-NII bands may be aggregated to support a 160 MHz channel on channel number 50.
4. Without additional testing, the maximum output power for this is limited to the lower of the maximum output power certified for the two bands. When SAR measurement is required for at least one of the bands and the highest reported SAR adjusted by the ratio of specified maximum output power of aggregated to standalone band is  $> 1.2$  W/kg, SAR is required for the 160 MHz channel. This procedure does not apply to an aggregated band with maximum output higher than the standalone band(s); the aggregated band must be tested independently for SAR. SAR is not required when the 160 MHz channel is operating at a reduced maximum power and also qualifies for SAR test exclusion.

**B) U-NII-2C and U-NII-3 Bands**

The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. When Terminal Doppler Weather Radar (TDWR) restriction applies, all channels that operate at 5.60 – 5.65 GHz must be included to apply the SAR test reduction and measurement procedures.

When the same transmitter and antenna(s) are used for U-NII-2C band and U-NII-3 band or 5.8 GHz band of §15.247, the bands may be aggregated to enable additional channels with 20, 40 or 80 MHz bandwidth to span across the band gap, as illustrated in Appendix B. The maximum output power for the additional band gap channels is limited to the lower of those certified for the bands. Unless band gap channels are permanently disabled, they must be considered for SAR testing. The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. To maintain SAR measurement accuracy and to facilitate test reduction, the channels in U-NII-2C band above 5.65 GHz may be grouped with the 5.8 GHz channels in U-NII-3 or §15.247 band to enable two SAR probe calibration frequency points to cover the bands, including the band gap channels. When band gap channels are supported and the bands are not aggregated for SAR





testing, band gap channels must be considered independently in each band according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

### C) OFDM Transmission Mode SAR Test Configuration and Channel Selection Requirements

The initial test configuration for 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple configurations in a frequency band have the same specified maximum output power, the initial test configuration is determined according to the following steps applied sequentially.

1. The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
2. If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
3. If multiple configurations have the same specified maximum output power, largest channel band width and lowest order modulation, the lowest data rate configuration among these configurations is selected.
4. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n. After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following. These channel selection procedures apply to both the initial test configuration and subsequent test configuration(s), with respect to the default power measurement procedures or additional power measurements required for further SAR test reduction. The same procedures also apply to subsequent highest output power channel(s) selection.
5. The channel closest to mid-band frequency is selected for SAR measurement.
6. For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

### D) SAR Test Requirements for OFDM configurations

When SAR measurement is required for 802.11 a/n/ac OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. When the same transmitter and antenna(s) are used for U-NII-1 and U-NII-2A bands, additional SAR test reduction Vapplies. When band gap channels between U-NII-2C band and 5.8 GHz U-NII-3 or §15.247 band are supported, the highest maximum output power transmission mode configuration and maximum output power channel across the bands must be used to determine SAR test reduction, according to the initial test configuration and subsequent test configuration requirements. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a







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testconfiguration with the highest measured maximum output power should be clearly distinguished toapply the procedures.



## 12 Conducted RF Output Power

### <WLAN 2.4GHz>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
2.4GHz WLAN	802.11b 1Mbps	CH 1	2412	13.32	14.00	100.00
		CH 6	2437	13.40	14.00	
		CH 11	2462	<b>13.62</b>	<b>14.00</b>	
	802.11g 6Mbps	CH 1	2412	12.54	13.00	100.00
		CH 6	2437	12.60	13.00	
		CH 11	2462	12.88	13.00	
	802.11n-H T20 MCS0	CH 1	2412	12.20	13.00	100.00
		CH 6	2437	12.30	13.00	
		CH 11	2462	12.37	13.00	

### <WLAN 5GHz>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.2GHz WLAN	802.11a 6Mbps	CH 36	5180	11.69	12.50	97.21
		CH 40	5200	11.95	12.50	
		CH 48	5240	12.02	12.50	
	802.11n-HT20 MCS0	CH 36	5180	11.82	12.50	97.03
		CH 40	5200	12.08	12.50	
		CH 48	5240	12.15	12.50	
	802.11n-HT40 MCS0	CH 38	5190	11.95	12.50	97.05
		CH 46	5230	11.89	12.50	
	802.11ac-VH T20 MCS0	CH 36	5180	11.92	12.50	93.62
		CH 40	5200	12.08	12.50	
		CH 48	5240	<b>12.16</b>	<b>12.50</b>	
	802.11ac-VH T40 MCS0	CH 38	5190	11.96	12.00	93.97
		CH 46	5230	11.85	12.00	
	802.11ac-VH T80 MCS0	CH 42	5210	11.53	12.00	88.22



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11a MCS0	CH 149	5745	12.83	13.50	97.21
		CH 157	5785	12.95	13.50	
		CH 165	5825	<b>13.49</b>	<b>14.00</b>	
	802.11n-HT20 MCS0	CH 149	5745	12.45	13.00	97.03
		CH 157	5785	12.66	13.00	
		CH 165	5825	13.18	13.50	
	802.11n-HT40 MCS0	CH 151	5755	12.58	13.00	97.05
		CH 159	5795	12.90	13.50	
	802.11ac-VHT20 MCS0	CH 149	5745	12.48	13.00	93.82
		CH 157	5785	12.78	13.00	
		CH 165	5825	13.14	13.50	
	802.11ac-VHT40 MCS0	CH 151	5755	12.50	13.00	93.97
		CH 159	5795	12.80	13.00	
	802.11ac-VHT80 MCS0	CH 155	5775	12.11	13.00	88.22

### <Bluetooth 1>

Mode	Channel	Frequency (MHz)	Peak power (dBm)		
			1Mbps	2Mbps	3Mbps
BR / EDR	CH 00	2402	6.43	<b>7.65</b>	6.41
	CH 39	2441	6.35	7.36	6.29
	CH 78	2480	5.75	7.02	5.75
Tune-up Limit			6.50	8.00	7.00

Mode	Channel	Frequency (MHz)	Peak power (dBm)
			GFSK
LE	CH 00	2402	6.26
	CH 19	2440	<b>6.98</b>
	CH 39	2480	6.55
Tune-up Limit			7.00





## &lt;Bluetooth 2&gt;

Mode	Channel	Frequency (MHz)	Peak power (dBm)		
			1Mbps	2Mbps	3Mbps
BR / EDR	CH 00	2402	-3.28	-2.53	-2.17
	CH 39	2441	-2.83	-2.07	<b>-1.72</b>
	CH 78	2480	-2.95	-2.21	-1.85
Tune-up Limit			-3.00	-2.00	-1.00



## 13 Block Diagram of the Tests to be Performed

### 13.1 Body

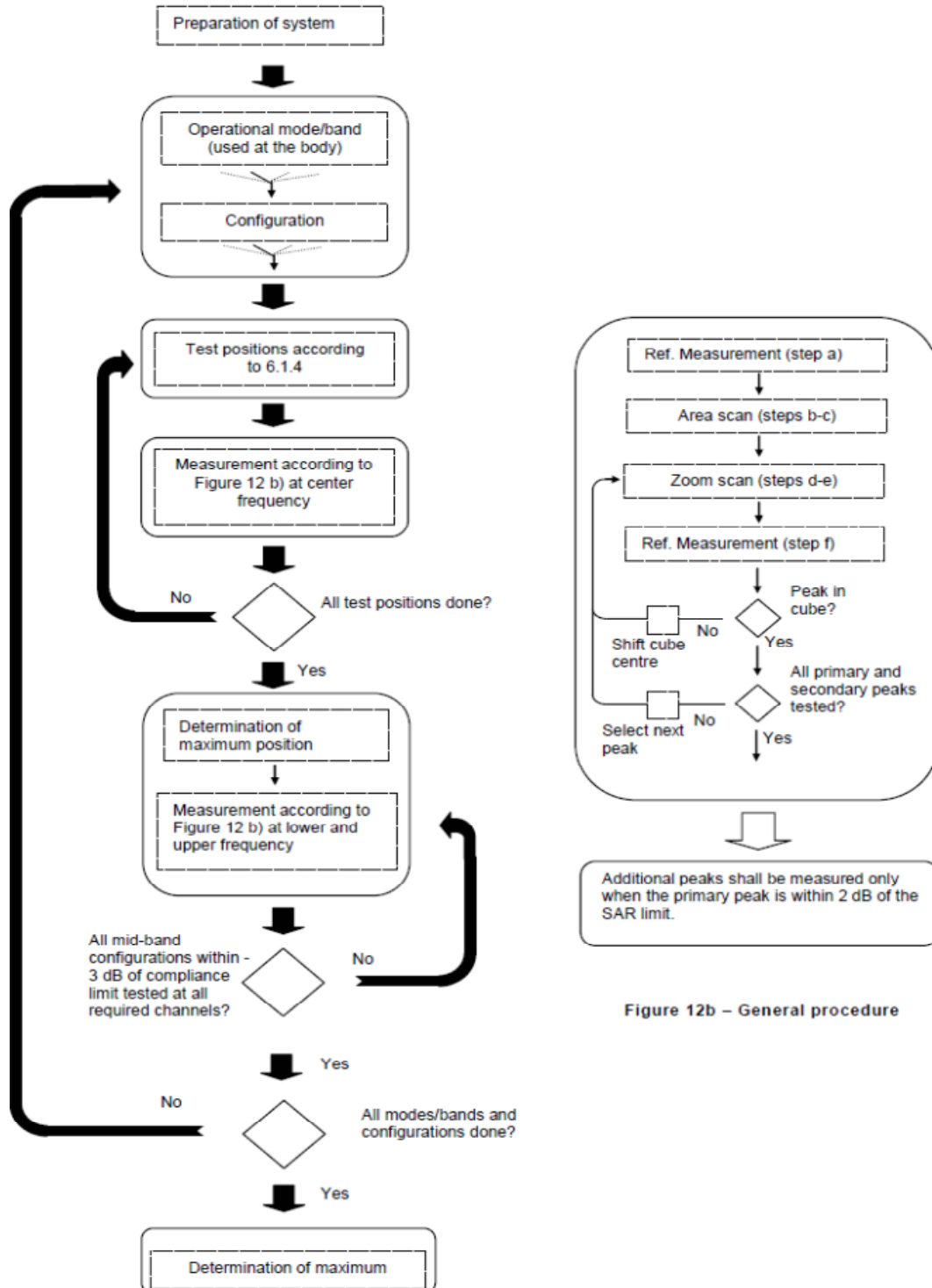


Figure 12b – General procedure



## 14 Test Results List

### 14.1 Test Guidance

1. Per KDB 447498 D04v01, 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 WLAN/Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)\* Duty Cycle scaling factor \* Tune-up scaling factor.
2. Per KDB 447498 D04v01, 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:
  - d.  $\leq 0.8$  W/kg or  $2.0$  W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
  - e.  $\leq 0.6$  W/kg or  $1.5$  W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
  - f.  $\leq 0.4$  W/kg or  $1.0$  W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is  $\geq 0.8$ W/kg.
4. Per KDB248227 D01v02r02, a Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies required for operations in the U.S. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. Unless it is permitted by specific KDB procedures or continuous transmission is specifically restricted by the device, the reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit. When a device is not capable of sustaining continuous transmission or the output can become nonlinear, and it is limited by hardware design and unable to transmit at higher than 85% duty factor, a periodic duty factor within 15% of the maximum duty factor the device is capable of transmitting should be used. The reported SAR must be scaled to the maximum transmission duty factor to determine compliance. Descriptions of the procedures applied to establish the specific duty factor used for SAR testing are required in SAR reports to support the test results.
5. There are two types of battery in this report, the first one was used to testing all of exposure conditions,





and the others were verified the worst condition of body exposure.

## 14.2 Standalone Body SAR

### ➤ WLAN Body SAR

Plot No.	Band/Mode	Test Position	Ch.	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WLAN2.4GHz/802.11b	Section	11	13.62	14.00	1.091	0.020	0.022
1#	WLAN2.4GHz/802.11b	Top	11	13.62	14.00	1.091	0.040	0.044
	WLAN5GHz 802.11ac-VHT20	Section	48	12.16	12.50	1.081	0.027	0.031
2#	WLAN5GHz/802.11ac-VHT20	Top	48	12.16	12.50	1.081	0.036	0.042
	WLAN5GHz 802.11ac-VHT20	Section	165	13.49	14.00	1.125	0.065	0.075
	WLAN5GHz/802.11ac-VHT20	Top	165	13.49	14.00	1.125	0.076	0.088
3#	WLAN5GHz/802.11ac-VHT20	Top 2 <sup>st</sup> battery	165	13.49	14.00	1.125	0.080	0.093

#### Note:

1. Body SAR testing was performed at 0mm separation, and this distance is determined by the handset manufacturer that there will be body-worn accessories that users may acquire at the time of equipment certification, to enable users to purchase aftermarket body-worn accessories with the required minimum separation.
2. Per KDB 648474 D04v01r03, when the *Reported* SAR for a body accessory measured without a headset connected to the handset is  $\leq 1.2$  W/kg, SAR testing with a headset connected to the handset is not required.
3. Per KDB 447498 D01v06, for each exposure position, if the highest output channel Reported SAR  $\leq 0.8$ W/kg, other channels SAR testing is not necessary.
4. The 2.4GHz WLAN reported 1g SAR (W/kg) should be scaled with the duty cycle scaling factor 1.029 and 5GHz WLAN with 1.029.



### 14.3 Stand-alone SAR test Exclusion

- Per KDB 447498 D01v06, the 1-g SAR test exclusion thresholds for 100 MHz to 6 GHz at *test separation distances*  $\leq 50$  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, where

- $f(\text{GHz})$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

#### <Bluetooth Estimated SAR>

Band	Channel	Frequency (GHz)	Max. tune-up Power (dBm)	Max. Power (mW)	Test distance (mm)	Result	exclusion thresholds for 1-g SAR
Bluetooth 1	CH 39	2.402	8.00	6.31	5.00	1.96	3.0
Bluetooth 2	CH 39	2.441	-1.00	0.79	5.00	0.25	3.0

- The max. tune-up power was provided by manufacturer, base on the result of note 1, RF exposure evaluation is not required.
- The output power of all data rate were pre-scan, just the worst case of all mode were shown in report.
- When the minimum *test separation distance* is  $< 5$  mm, a distance of 5 mm according is applied to determine SAR test exclusion.
- When the standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to the following to determine simultaneous transmission SAR test exclusion

$(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \cdot [\sqrt{f(\text{GHz})} / x] \text{ W/kg}$  for test separation distances  $\leq 50$  mm, where  $x = 7.5$  for 1-g SAR.

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

#### <Bluetooth Body SAR>

Band	Channel	Frequency (GHz)	Max. tune-up Power (dBm)	Max. Power (mW)	Test distance (mm)	Test threshold
Bluetooth 1	CH 39	2.402	8.00	6.31	5.00	0.261
Bluetooth 2	CH 39	2.441	-1.00	0.79	5.00	0.033







## 15 Simultaneous Transmission Evaluation

Remark: Both the WLAN and Bluetooth transmitter share the same antenna and cannot transmit simultaneously.

## 16 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 appendix (B,C,D,E) will be submitted separately.

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

