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## 1 . Test Standards and Report version

### 1.1. Test Standards

The tests were performed according to following standards:

[FCC 47 Part 2.1093](#): Radiofrequency Radiation Exposure Evaluation:Portable Devices

[IEEE Std C95.1, 1999 Edition](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz

[IEEE Std 1528™-2013](#): IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.

FCC published RF exposure KDB procedures:

[KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04](#): SAR Measurement Requirements for 100 MHz to 6 GHz

[KDB 865664 D02 RF Exposure Reporting v01r02](#): RF Exposure Compliance Reporting and Documentation Considerations

[KDB 447498 D01 General RF Exposure Guidance v06](#): Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

[KDB 248227 D01 802 11 Wi-Fi SAR v02r02](#): SAR Measurement Proceduresfor802.11 a/b/g Transmitters

[KDB 616217 D04 SAR for laptop and tablets v01r02](#): SAR Evaluation Requirements for Laptop, Notebook, Netbook and Tablet Computers

### 1.2. Report version

Revision No.	Date of issue	Description
N/A	2019-06-19	Original

## 2. Summary

### 2.1. Client Information

Applicant:	Alco Electronics Ltd
Address:	11/F Metropole Square, 2 On Yiu Street, Sha Tin, New Territories, Hong Kong
Manufacturer:	Alco Electronics Ltd
Address:	11/F Metropole Square, 2 On Yiu Street, Sha Tin, New Territories, Hong Kong

### 2.2. Product Description

Name of EUT:	Tablet
Trade Mark:	Venturer,RCA
Model No.:	CT9613W23PH6
Listed Model(s):	RCT6613W23
Power supply:	DC 3.7V
Device Category:	Portable
Product stage:	Production unit
RF Exposure Environment:	General Population / Uncontrolled
Hardware version:	V1.2
Software version:	RCT6613W23P-ANDROID9 -Vxx-V1.25.100-A0x
<b>Maximum SAR Value</b>	
Separation Distance:	Body: 0mm
Max Report SAR Value (1g):	Body: <b>0.671 W/kg</b>
<b>WIFI 2.4G</b>	
Supported type:	802.11b/802.11g/802.11n(HT20)
Modulation:	DSSS for 802.11b OFDM for 802.11g/802.11n(HT20)
Operation frequency:	2412MHz~2462MHz
Channel number:	11
Channel separation:	5MHz
Antenna type:	build in

<b>Bluetooth</b>	
Version:	Supported BT4.0+EDR
Modulation:	GFSK, $\pi/4$ DQPSK, 8DPSK
Operation frequency:	2402MHz~2480MHz
Channel number:	79
Channel separation:	1MHz
Antenna type:	build in
<b>Bluetooth</b>	
Version:	Supported BT4.0+BLE
Modulation:	GFSK
Operation frequency:	2402MHz~2480MHz
Channel number:	40
Channel separation:	2MHz
Antenna type:	build in
<i>Remark:</i>	
1. <i>The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power</i>	

### **3. Test Environment**

#### **3.1. Test laboratory**

Laboratory: Shenzhen Huatongwei International Inspection Co., Ltd.

Address: 1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China

#### **3.2. Test Facility**

##### **CNAS-Lab Code: L1225**

Shenzhen Huatongwei International Inspection Co., Ltd. has been assessed and proved to be in compliance with CNAS-CL01 Accreditation Criteria for Testing and Calibration Laboratories (identical to ISO/IEC17025: 2005 General Requirements) for the Competence of Testing and Calibration Laboratories.

##### **A2LA-Lab Cert. No.: 3902.01**

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2005 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

##### **FCC-Registration No.: 762235**

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the FCC (Federal Communications Commission). The acceptance letter from the FCC is maintained in our files. Registration 762235.

##### **IC-Registration No.: 5377B-1**

Two 3m Alternate Test Site of Shenzhen Huatongwei International Inspection Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for the performance of radiated measurements with Registration No. 5377B-1.

##### **ACA**

Shenzhen Huatongwei International Inspection Co., Ltd. EMC Laboratory can also perform testing for the Australian C-Tick mark as a result of our A2LA accreditation.

#### **3.3. Environmental conditions**

During the measurement the environmental conditions were within the listed ranges:

Ambient temperature	18 °C to 25 °C
Ambient humidity	30%RH to 70%RH
Air Pressure	950-1050mbar

#### 4. Equipments Used during the Test

Used	Test Equipment	Manufacturer	Model No.	Serial No.	Cal. date (YY-MM-DD)	Due date (YY-MM-DD)
●	Data Acquisition Electronics DAEx	SPEAG	DAE4	1549	2019/03/19	2020/03/18
●	E-field Probe	SPEAG	EX3DV4	7494	2019/03/25	2020/03/24
○	Universal Radio Communication Tester	R&S	CMW500	137681	2018/07/11	2019/07/10
<b>● Tissue-equivalent liquids Validation</b>						
●	Dielectric Assessment Kit	SPEAG	DAK-3.5	1267	N/A	N/A
○	Dielectric Assessment Kit	SPEAG	DAK-12	1130	N/A	N/A
●	Network analyzer	Keysight	E5071C	MY46733048	2018/09/19	2019/09/18
<b>● System Validation</b>						
○	System Validation Antenna	SPEAG	CLA-150	4024	2018/02/21	2021/02/20
○	System Validation Dipole	SPEAG	D450V3	1102	2018/02/23	2021/02/22
○	System Validation Dipole	SPEAG	D750V3	1180	2018/02/07	2021/02/06
○	System Validation Dipole	SPEAG	D835V2	4d238	2018/02/19	2021/02/18
○	System Validation Dipole	SPEAG	D1750V2	1164	2018/02/06	2021/02/05
○	System Validation Dipole	SPEAG	D1900V2	5d226	2018/02/22	2021/02/21
●	System Validation Dipole	SPEAG	D2450V2	1009	2018/02/05	2021/02/04
○	System Validation Dipole	SPEAG	D2600V2	1150	2018/02/05	2021/02/04
○	System Validation Dipole	SPEAG	D5GHzV2	1273	2018/02/21	2021/02/20
●	Signal Generator	R&S	SMB100A	114360	2018/08/21	2019/08/20
●	Power Viewer for Windows	R&S	N/A	N/A	N/A	N/A
●	Power sensor	R&S	NRP18A	101010	2018/08/21	2019/08/20
●	Power sensor	R&S	NRP18A	101011	2018/08/21	2019/08/20
●	Power Amplifier	BONN	BLWA 0160-2M	1811887	2018/11/15	2019/11/14
●	Dual Directional Coupler	Mini-Circuits	ZHDC-10-62-S+	F975001814	2018/11/15	2019/11/14
●	Attenuator	Mini-Circuits	VAT-3W2+	1819	2018/11/15	2019/11/14
●	Attenuator	Mini-Circuits	VAT-10W2+	1741	2018/11/15	2019/11/14

**Note:**

1. The DAE ,Probe and Dipole calibration reference to the Appendix B and C.
2. Referring to KDB865664 D01, the dipole calibration interval can be extended to 3 years with justification. The dipole are also not physically damaged or repaired during the interval.

## **5. Measurement Uncertainty**

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is  $< 1.5$  W/kg. The expanded SAR measurement uncertainty must be  $\leq 30\%$ , for a confidence interval of  $k = 2$ . If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.



## 6. SAR Measurements System Configuration

### 6.1. SAR Measurement Set-up

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

A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).

A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronic (DAE) which performs the signal amplification, 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.

A unit to operate the optical surface detector which is connected to the EOC.

The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.

The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows 2003.

DASY5 software and SEMCAD data evaluation software.

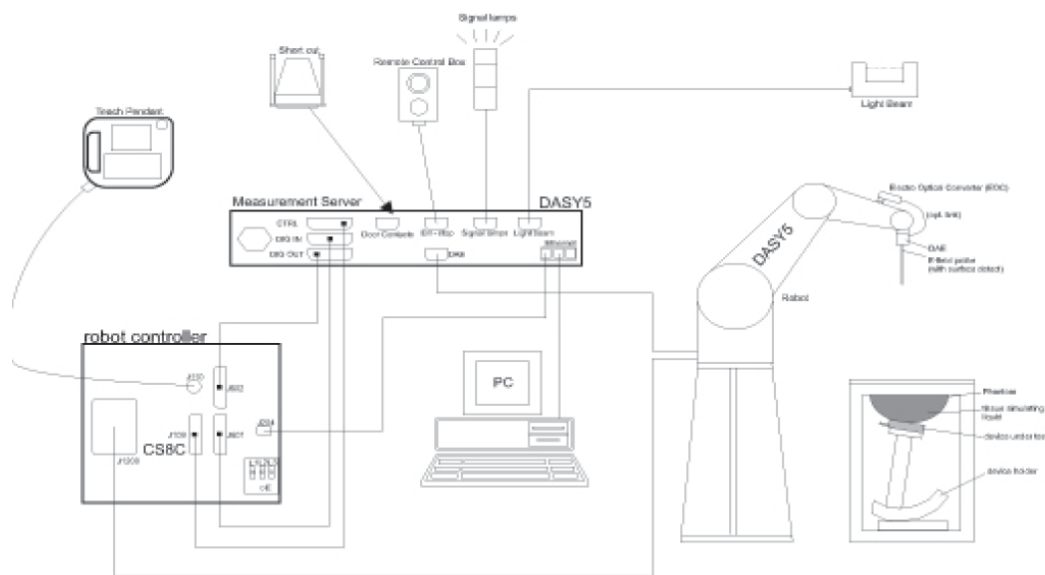
Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.

The generic twin phantom enabling the testing of left-hand and right-hand usage.

The device holder for handheld Mobile Phones.

Tissue simulating liquid mixed according to the given recipes.

System validation dipoles allowing to validate the proper functioning of the system.



## 6.2. DASY5 E-field Probe System

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation.

### ● Probe Specification

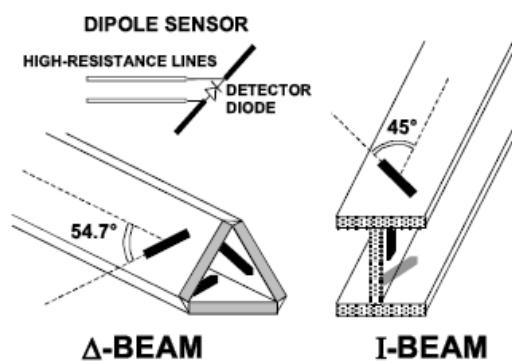
Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	4 MHz to 10 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 10 GHz)
Directivity	$\pm 0.1$ dB in HSL (rotation around probe axis) $\pm 0.3$ dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 $\mu$ W/g to > 100 W/kg; Linearity: $\pm 0.2$ dB (noise: typically <1 $\mu$ W/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.0 mm
Application	General dosimetry up to 6 GHz Dosimetry in strong gradient fields Compliance tests of Mobile Phones
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI



### ● Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



### 6.3. Phantoms

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with standard and all known tissue-simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.



ELI4 Phantom

### 6.4. Device Holder

The device was placed in the device holder (illustrated below) that is supplied by SPEAG as an integral part of the DASY system.

The DASY device holder is designed to cope with the different positions given in the standard. It has two scales for device rotation (with respect to the body axis) and device inclination (with respect to the line between the ear reference points). The rotation centers for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.



Device holder supplied by SPEAG

## 7. SAR Test Procedure

### 7.1. Scanning Procedure

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max.  $\pm 5\%$ .

The “surface check” measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above  $\pm 0.1\text{mm}$ ). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe (It does not depend on the surface reflectivity or the probe angle to the surface within  $\pm 30^\circ$ .)

#### **Area Scan**

The Area Scan is used as a fast scan in two dimensions to find the area of high field values before running a detailed measurement around the hot spot. Before starting the area scan a grid spacing of 15 mm x 15 mm is set. During the scan the distance of the probe to the phantom remains unchanged. After finishing area scan, the field maxima within a range of 2 dB will be ascertained.

#### **Zoom Scan**

After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 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 then integrated with the trapezoidal algorithm.

#### **Spatial Peak Detection**

The procedure for spatial peak SAR evaluation has been implemented and can determine values of masses of 1g and 10g, as well as for user-specific masses. The DASY5 system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- boundary correction
- peak search for averaged SAR

During a maximum search, global and local maxima searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard’s method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

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. Several measurements at different distances are necessary for the extrapolation. Extrapolation routines require at least 10 measurement points in 3-D space.

They are used in the Zoom Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard’s method for extrapolation.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 5mm steps.

**Table 1: Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v04**

		$\leq 3$ 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: $\Delta x_{Area}$ , $\Delta y_{Area}$		$\leq 2$ 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: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$		$\leq 2$ 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: $\Delta z_{Zoom}(n)$	$\leq 5$ mm	3 – 4 GHz: $\leq 4$ mm 4 – 5 GHz: $\leq 3$ mm 5 – 6 GHz: $\leq 2$ mm
	graded grid $\Delta z_{Zoom}(1)$ : 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
	$\Delta z_{Zoom}(n>1)$ : between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ 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.			

## 7.2. Data Storage and Evaluation

### Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors),s together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “.DA4”. The 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 incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [W/kg], [mW/cm<sup>2</sup>], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

### Data Evaluation

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	Sensitivity:	Normi, ai0, ai1, ai2
	Conversion factor:	ConvFi
	Diode compression point:	Dcpi
Device parameters:	Frequency:	f
	Crest factor:	cf
Media parameters:	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 DASY5 components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

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

Vi:	compensated signal of channel ( i = x, y, z )
Ui:	input signal of channel ( 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:

$$E - \text{fieldprobes} : \quad E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

$$H - \text{fieldprobes} : \quad H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

Vi:	compensated signal of channel ( i = x, y, z )
Norm <sub>i</sub> :	sensor sensitivity of channel ( i = x, y, z ), [mV/(V/m) <sup>2</sup> ] for E-field Probes
ConvF:	sensitivity enhancement in solution
a <sub>ij</sub> :	sensor sensitivity factors for H-field probes
f:	carrier frequency [GHz]
E <sub>i</sub> :	electric field strength of channel i in V/m
H <sub>i</sub> :	magnetic field strength of channel i in A/m

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

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

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

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

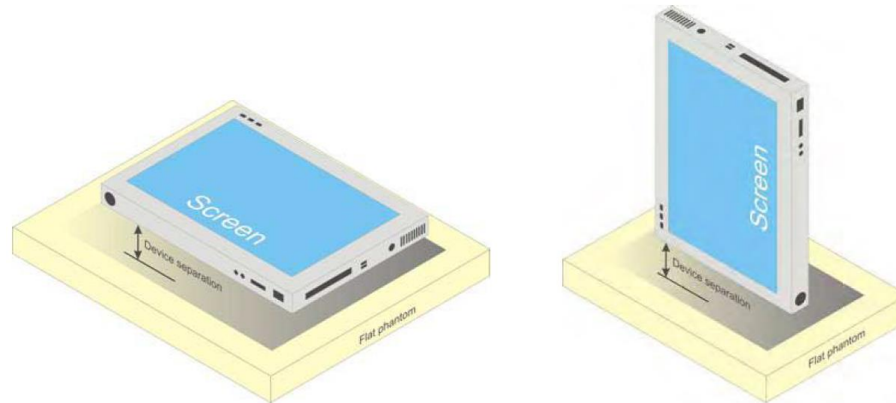
SAR: local specific absorption rate in W/kg  
Etot: total field strength in V/m  
 $\sigma$ : conductivity in [mho/m] or [Siemens/m]  
 $\rho$ : equivalent tissue density in g/cm<sup>3</sup>

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

## 8. Position of the wireless device in relation to the phantom

### 8.1. Body-supported device

Other devices that fall into this category include tablet type portable computers and credit card transaction authorisation terminals, point-of-sale and/or inventory terminals. Where these devices may be torso or limb-supported, the same principles for body-supported devices are applied.



b) Tablet form factor portable computer



## 9. System Check

### 9.1. Tissue Dielectric Parameters

The liquid has previously been proven to be suited for worst-case. It's satisfying the latest tissue dielectric parameters requirements proposed by the KDB865664.

Tissue dielectric parameters for head and body phantoms		
Target Frequency	Body	
(MHz)	$\epsilon_r$	$\sigma$ (s/m)
2450	52.7	1.95

#### Check Result:

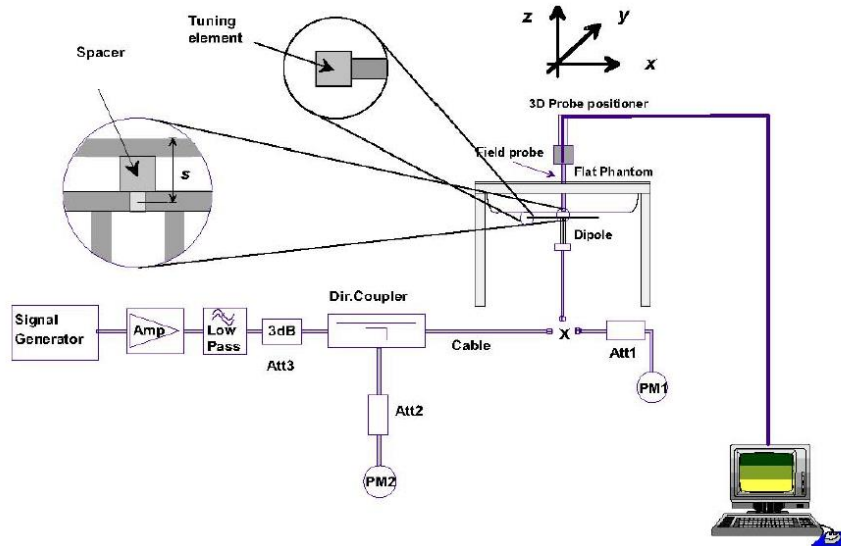
Dielectric performance of Body tissue simulating liquid									
Frequency (MHz)	$\epsilon_r$		$\sigma$ (s/m)		Delta ( $\epsilon_r$ )	Delta ( $\sigma$ )	Limit	Temp (°C)	Date
	Target	Measured	Target	Measured					
2450	52.70	53.03	1.95	2.00	0.63%	2.56%	±5%	22.5	2019-06-13

### 9.2. SAR System Check

The purpose of the system check is to verify that the system operates within its specifications at the device test frequency. The system check is simple check of repeatability to make sure that the system works correctly at the time of the compliance test;

System check results have to be equal or near the values determined during dipole calibration with the relevant liquids and test system ( $\pm 10\%$ ).

System check is performed regularly on all frequency bands where tests are performed with the DASY5 system.



System Performance Check Setup

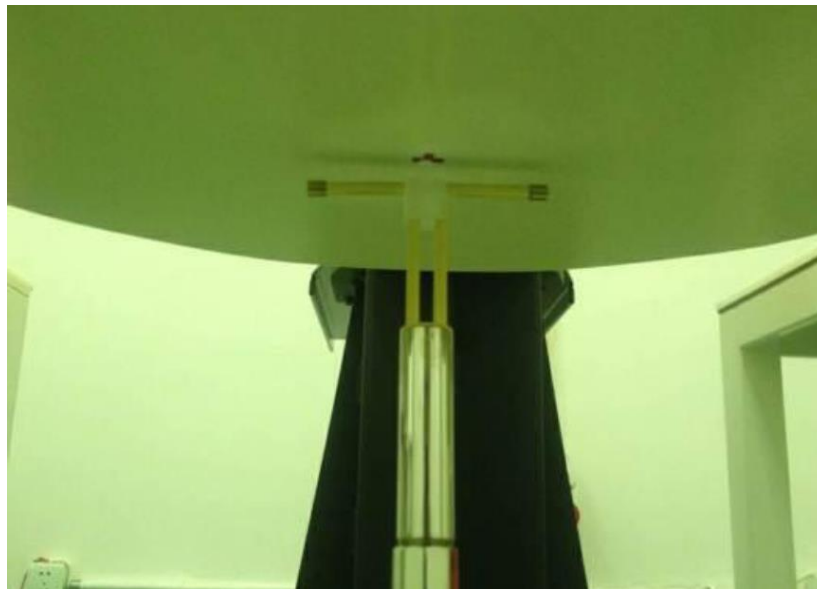


Photo of Dipole Setup

**Check Result:**

Bdoy											
Frequency (MHz)	1g SAR			10g SAR			Delta (1g)	Delta (10g)	Limit	Temp (°C)	Date
	Target 1W	Normalize to 1W	Measured 250mW	Target 1W	Normalize to 1W	Measured 250mW					
2450	49.40	50.00	12.50	23.30	23.32	5.83	1.21%	0.09%	±10%	22.5	2019-06-13

## Plots of System Performance Check

### SystemPerformanceCheck-Body 2450MHz

DUT: D2450V2; Type: D2450V2; Serial: 1009

Date:2019-06-13

Communication System: UID 0, CW (0); Frequency: 2450 MHz

Medium parameters used:  $f = 2450$  MHz;  $\sigma = 2.001$  S/m;  $\epsilon_r = 53.03$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

#### DASY5 Configuration:

- Probe: EX3DV4 - SN7494; ConvF(8, 8, 8); Calibrated: 3/25/2019;
- Sensor-Surface: 1.4mm (Mechanical Surface Detection),  $z = 1.0, 31.0$
- Electronics: DAE4 Sn1549; Calibrated: 3/19/2019
- Phantom: ELI V8.0 ; Type: QD OVA 004 AA ; Serial: 2078
- DASY52 52.10.0(1446); SEMCAD X 14.6.10(7417)

**Body/d=10mm,Pin=250mW/Area Scan (71x71x1):** Interpolated grid:  $dx=1.200$  mm,  $dy=1.200$  mm

Maximum value of SAR (interpolated) = 21.1 W/kg

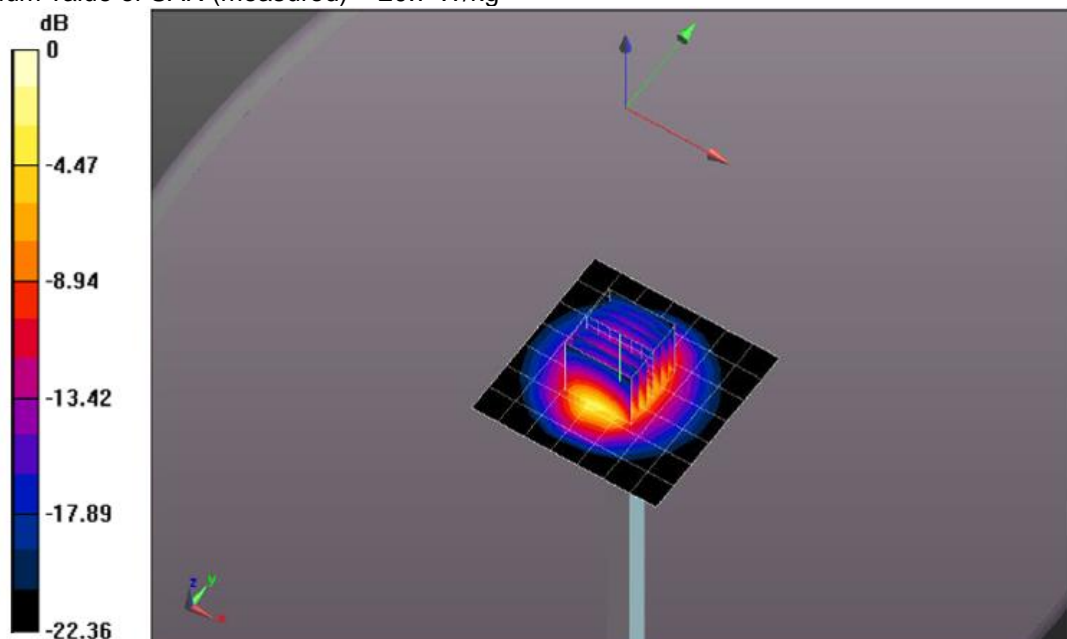
**Body/d=10mm,Pin=250mW/Zoom Scan (7x7x7)/Cube 0:** Measurement grid:  $dx=5$ mm,  $dy=5$ mm,  $dz=5$ mm

Reference Value = 105.6 V/m; Power Drift = -0.01 dB

Peak SAR (extrapolated) = 25.7 W/kg

**SAR(1 g) = 12.5 W/kg; SAR(10 g) = 5.83 W/kg**

Maximum value of SAR (measured) = 20.7 W/kg



## 10. SAR Exposure Limits

SAR assessments have been made in line with the requirements of FCC 47 CFR § 2.1093.

Type Exposure	Limit (W/kg)	
	General Population / Uncontrolled Exposure Environment	Occupational / Controlled Exposure Environment
Spatial Average SAR (whole body)	0.08	0.4
Spatial Peak SAR (1g cube tissue for head and trunk)	1.6	8.0
Spatial Peak SAR (10g for limb)	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 may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

## 11. Conducted Power Measurement Results

### WLAN Conducted Power

For 2.4GHz WLAN SAR testing, highest average RF output power channel for the lowest data rate for 802.11b were for SAR evaluation. 802.11g/n were not investigated since the average putput powers over all channels and data rates were not more than 0.25dB higher than the tested channel in the lowest data rate of 802.11b mode.

The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures.

WIFI 2.4G				
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)
802.11b 1Mbps	1	2412	13.56	10.72
	6	2437	13.76	11.63
	11	2462	14.36	12.01
802.11g 6Mbps	1	2412	16.29	12.39
	6	2437	16.40	12.68
	11	2462	16.55	12.76
802.11n (HT20) MCS0	1	2412	15.91	11.91
	6	2437	16.51	12.48
	11	2462	16.69	12.65

### Bluetooth Conducted Power

Bluetooth				
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)
GFSK	0	2402	3.52	3.12
	39	2441	3.54	3.24
	78	2480	3.22	2.91
$\pi/4$ QPSK	0	2402	3.36	2.42
	39	2441	3.44	2.53
	78	2480	3.12	2.17
8DPSK	0	2402	3.43	2.35
	39	2441	3.55	2.50
	78	2480	3.28	2.15
GFSK(BLE)	0	2402	3.29	2.98
	19	2440	3.44	3.18
	39	2480	3.08	2.79

## 12. Maximum Tune-up Limit

WLAN 2.4G	
Mode	Maximum Tune-up (dBm) Conducted Average Power
802.11b	12.50
802.11g	13.00
802.11n(HT20)	13.00

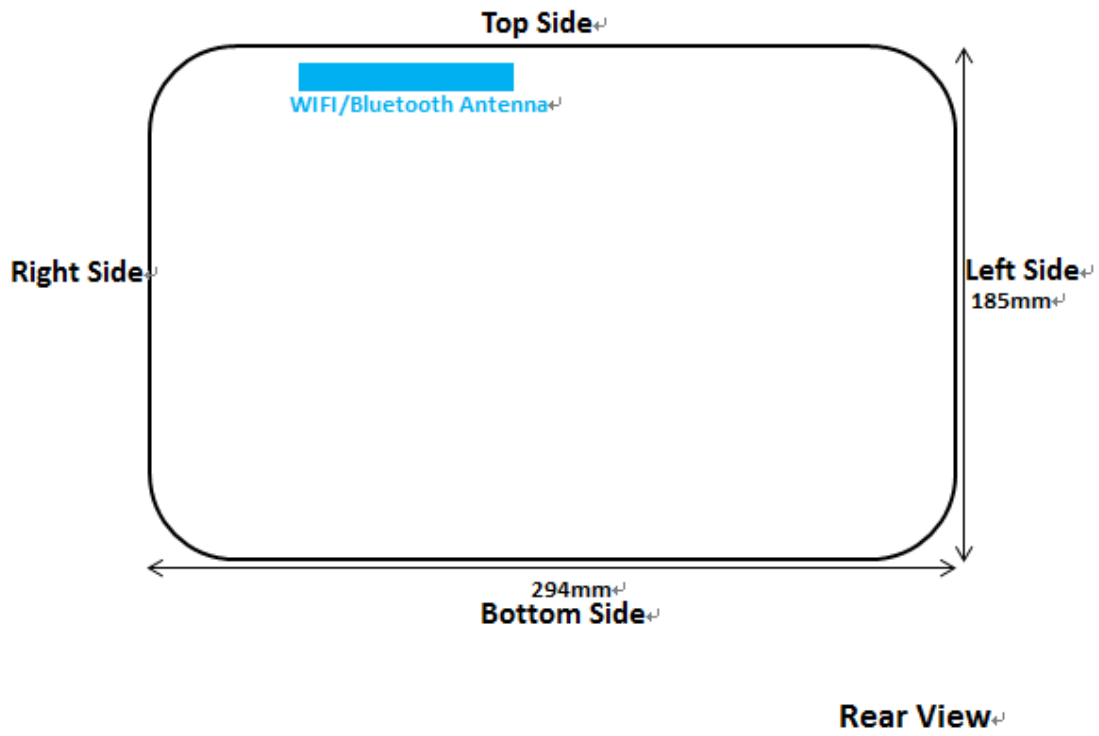
**Note:**

When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

Bluetooth	
Mode	Maximum Tune-up (dBm) Conducted Average Power
GFSK	3.50
$\pi/4$ QPSK	3.00
8DPSK	2.50
GFSK(BLE)	3.50

### 13. RF Exposure Conditions (Test Configurations)

#### 13.1. Antenna Location





### 13.2. Standalone SAR test exclusion considerations

KDB 447498 with KDB 616217:

a) For 100 MHz to 6 GHz and *test separation distances* ≤ 50 mm, the 1-g SAR test exclusion thresholds are determined by the following:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR}$$

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

b) For 100 MHz to 6 GHz and *test separation distances* > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following :

1) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance - 50 mm)·(f(MHz)/150)]} mW, for 100 MHz to 1500 MHz

2) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance - 50 mm)·10]} mW, for > 1500 MHz and ≤6 GHz

#### Antennas ≤ 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		separation distances (mm)					Calculated Threshold Value				
		dBm	mW	Rear	Left	Right	Top	Bottom	Rear	Left	Right	Top	Bottom
WiFi 2.4G 802.11b	2462	12.50	17.78	5	175	43	7	173	5.6 MEASURE	> 50 mm	0.6 EXEMPT	4.0 MEASURE	> 50 mm
Bluetooth	2441	3.50	2.24	5	175	43	7	173	0.7 EXEMPT	> 50 mm	0.1 EXEMPT	0.5 EXEMPT	> 50 mm

#### Antennas > 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		separation distances (mm)					Calculated Threshold Value				
		dBm	mW	Rear	Left	Right	Top	Bottom	Rear	Left	Right	Top	Bottom
WiFi 2.4G	2462	12.50	17.78	5	175	43	7	173	≤ 50mm	1346 mW EXEMPT	≤ 50mm	≤ 50mm	1326 mW EXEMPT
Bluetooth	2441	3.50	2.24	5	175	43	7	173	≤ 50mm	1346 mW EXEMPT	≤ 50mm	≤ 50mm	1326 mW EXEMPT

### 13.3. Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 13.2:

Test Configurations	Rear	Left	Right	Top	Bottom
WiFi 2.4G 802.11b	Yes	No	No	Yes	No
Bluetooth	No	No	No	No	No

## 14. SAR Measurement Results

### SAR Test Reduction criteria are as follows:

- Reported SAR(W/kg) for WWAN = Measured SAR \*Tune-up Scaling Factor
- Reported SAR(W/kg) for Wi-Fi and Bluetooth = Measured SAR \* Tune-up scaling factor \* Duty Cycle scaling factor
- Duty Cycle scaling factor = 1 / Duty cycle (%)

### KDB 447498 D01 General RF Exposure Guidance:

Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

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

### KDB 248227 D01 SAR meas for 802.11:

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. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

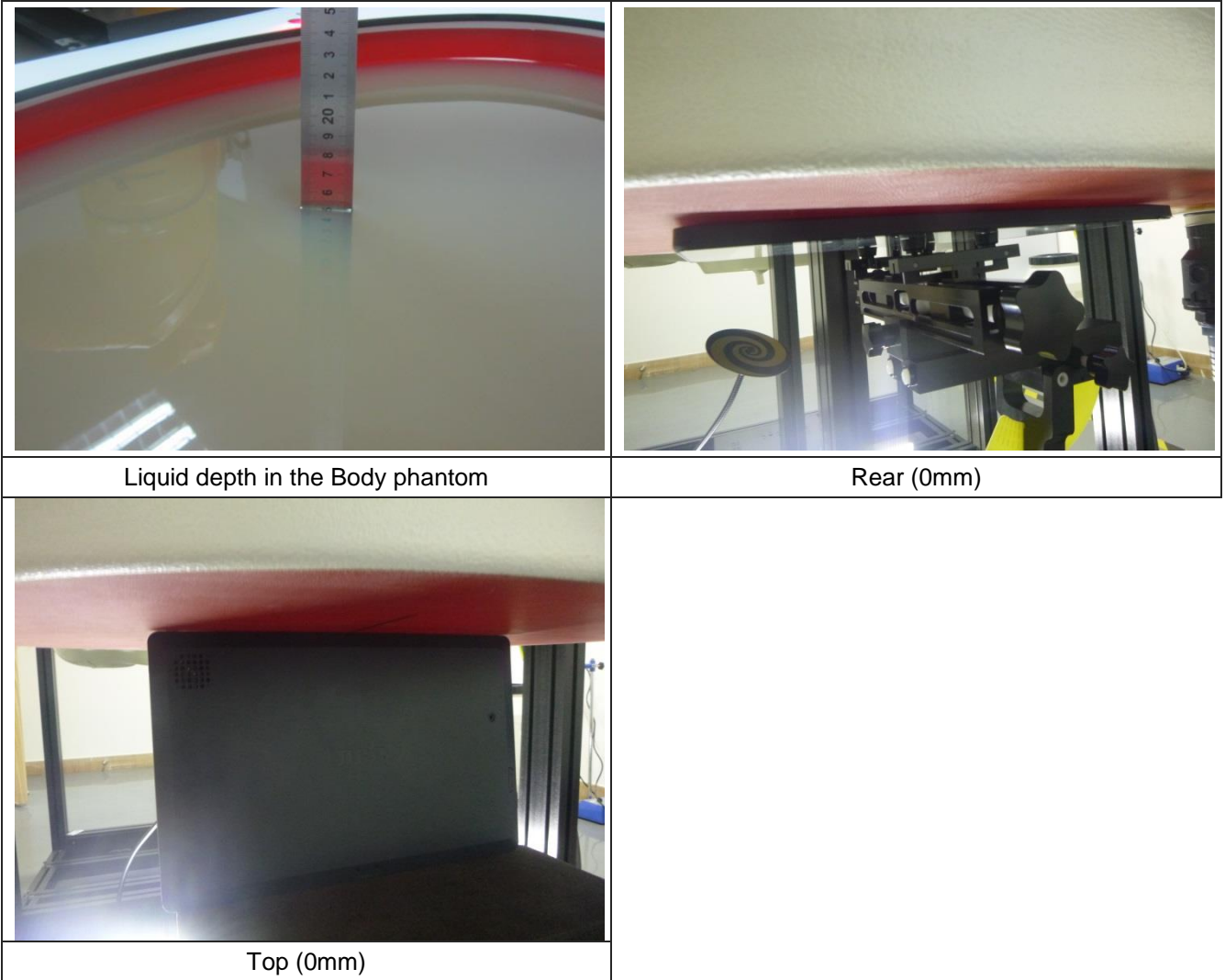
- $\leq 0.4$  W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- $> 0.4$  W/kg, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is  $\leq 0.8$  W/kg or all required test positions are tested.
  - For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
  - When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is  $> 0.8$  W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required test channels are considered.
  - The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.

To determine the initial test position, Area Scans were performed to determine the position with the Maximum Value of SAR (measured). The position that produced the highest Maximum Value of SAR is considered the worst case position; thus used as the initial test position.

WiFi 2.4G												
Mode	Test Position	Frequency		Conducted Power (dBm)	Tune-up limit (dBm)	Tune-up scaling factor	Duty Cycle	Duty Cycle Scaling Factor	Power Drift (dB)	Measured SAR(1g) (W/kg)	Report SAR(1g) (W/kg)	Plot No.
		CH	MHz									
802.11b	Rear	1	2412	10.72	12.50	1.51	100%	1.00	-0.10	0.285	0.429	-
		6	2437	11.63	12.50	1.22	100%	1.00	-0.18	0.428	0.523	-
		11	2462	12.01	12.50	1.12	100%	1.00	-0.07	0.599	0.671	1
	Left	11	2462	12.01	12.50	1.12	100%	1.00	-	-	-	-
	Right	11	2462	12.01	12.50	1.12	100%	1.00	-	-	-	-
	Top	11	2462	12.01	12.50	1.12	100%	1.00	-0.17	0.088	0.098	-
	Bottom	11	2462	12.01	12.50	1.12	100%	1.00	-	-	-	-

SAR Test Data Plots to the Appendix A.

### 15. TestSetup Photos



### 16. External and Internal Photos of the EUT

Please reference to the report No.: CHTEW19060114

**-----End of Report-----**