



# TEST REPORT

Report No. .... : **CHTEW20090107** Report verification: 

Project No..... : **SHT2008120603EW**

FCC ID..... : **A2HRCT6T48**

Applicant's name..... : **Alco Electronics Ltd**

Address..... : 11/F Metropole Square, 2 On Yiu Street, Sha Tin, New Territories, Hong Kong

Test item description ..... : **Tablet**

Trade Mark ..... : VENTURER / RCA

Model/Type reference..... : CT9T48

Listed Model(s) ..... : VCT9T48, RCT6T48

Standard ..... : **FCC 47 CFR Part2.1093**  
**IEEE Std C95.1, 1999 Edition**  
**IEEE 1528: 2013**


Date of receipt of test sample..... : Sep.09, 2020


Date of testing..... : Sep.10, 2020- Sep.16, 2020

Date of issue..... : Oct.09, 2020

Result..... : **PASS**

Compiled by  
( position+printedname+signature).... : File administrators: Fanghui Zhu 

Supervised by  
( position+printedname+signature).... : Test Engineer: Patrick Qiu 

Approved by  
( position+printedname+signature).... : Manager: Hans Hu 

**Testing Laboratory Name ..... : Shenzhen Huatongwei International Inspection Co., Ltd**

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

**Shenzhen Huatongwei International Inspection Co., Ltd. All rights reserved.**

This publication may be reproduced in whole or in part for non-commercial purposes as long as the Shenzhen Huatongwei International Inspection Co., Ltd is acknowledged as copyright owner and source of the material. Shenzhen Huatongwei International Inspection Co., Ltd takes no responsibility for and will not assume liability for damages resulting from the reader's interpretation of the reproduced material due to its placement and context.

*The test report merely correspond to the test sample.*

## Contents

<u>1.</u>	<u>Statement of Compliance</u>	<u>3</u>
<u>2.</u>	<u>Test Standards and Report version</u>	<u>4</u>
2.1.	Test Standards	4
2.2.	Report version	4
<u>3.</u>	<u>Summary</u>	<u>5</u>
3.1.	Client Information	5
3.2.	Product Description	5
3.3.	RF Specification Description	5
3.4.	Testing Laboratory Information	6
3.5.	Environmental conditions	6
<u>4.</u>	<u>Equipments Used during the Test</u>	<u>7</u>
<u>5.</u>	<u>Measurement Uncertainty</u>	<u>8</u>
<u>6.</u>	<u>SAR Measurements System Configuration</u>	<u>9</u>
6.1.	SAR Measurement Set-up	9
6.2.	DASY5 E-field Probe System	10
6.3.	Phantoms	11
6.4.	Device Holder	11
<u>7.</u>	<u>SAR Test Procedure</u>	<u>12</u>
7.1.	Scanning Procedure	12
7.2.	Data Storage and Evaluation	14
<u>8.</u>	<u>Dielectric Property Measurements &amp; System Check</u>	<u>16</u>
8.1.	Tissue Dielectric Parameters	16
8.2.	System Check	18
<u>9.</u>	<u>SAR Exposure Limits</u>	<u>21</u>
<u>10.</u>	<u>Conducted Power Measurement Results</u>	<u>22</u>
10.1.	Wi-Fi	22
10.2.	Bluetooth	23
<u>11.</u>	<u>Maximum Tune-up Limit</u>	<u>24</u>
<u>12.</u>	<u>RF Exposure Conditions (Test Configurations)</u>	<u>26</u>
12.1.	Antenna Location	26
12.2.	Standalone SAR test exclusion considerations	27
12.3.	Required Test Configurations	27
<u>13.</u>	<u>Measured and Reported SAR Results</u>	<u>28</u>
<u>14.</u>	<u>SAR Measurement Variability</u>	<u>30</u>
<u>15.</u>	<u>TestSetup Photos</u>	<u>31</u>
<u>16.</u>	<u>External and Internal Photos of the EUT</u>	<u>31</u>

## 1. Statement of Compliance

Maximum Reported SAR (W/kg @1g)	
RF Exposure Conditions	DTS
Body(Dist.= 0mm)	0.005

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

## 2 . Test Standards and Report version

### 2.1. 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:

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

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

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

[248227 D01 802.11 Wi-Fi SAR v02r02](#): SAR Measurement Procedures for 802.11 a/b/g Transmitters

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

[TCB workshop](#) April, 2019; Page 19, Tissue Simulating Liquids (TSL)

### 2.2. Report version

Revision No.	Date of issue	Description
N/A	2020-10-09	Original

### 3. Summary

#### 3.1. 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

#### 3.2. Product Description

Main unit	
Name of EUT:	Tablet
Trade Mark:	VENTURER / RCA
Model No.:	CT9T48
Listed Model(s):	VCT9T48, RCT6T48
Power supply:	DC 7.4V
Device Category:	Portable
Product stage:	Production unit
RF Exposure Environment:	General Population/Uncontrolled
HTW test sample No.:	YPHT20081206006
Hardware version:	EM8168-1409 V02
Software version:	V06
Device Dimension:	Overall (Length x Width x Thickness): 335x215x20mm

#### 3.3. RF Specification Description

Wi-Fi 2.4G	
Operating Mode:	802.11b 802.11g 802.11n(HT20) 802.11n(HT40)
Antenna Type:	FPC Antenna
Wi-Fi 5G	
Operation Band:	U-NII-3
Operating Mode:	802.11a 802.11n(HT20) 802.11n(HT40) 802.11ac(VHT20) 802.11ac(VHT40) 802.11ac(VHT80)
Antenna Type:	FPC Antenna

Bluetooth	
Bluetooth version:	V4.1
Support function:	EDR
Operating Mode:	GFSK π/4DQPSK 8DPSK
Antenna Type:	FPC Antenna
Bluetooth	
Bluetooth version:	V4.1
Support function:	BLE
Operating Mode:	GFSK
Antenna Type:	FPC Antenna
<i>Remark:</i>	
1. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power.	

### 3.4. Testing Laboratory Information

Laboratory Name	Shenzhen Huatongwei International Inspection Co., Ltd.	
Laboratory Location	1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China	
Qualifications	Type	Accreditation Number
	CNAS	L1225
	A2LA	3902.01
	FCC	762235
	Canada	5377A

### 3.5. 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	2020/04/04	2021/04/03
●	E-field Probe	SPEAG	EX3DV4	7494	2020/04/01	2021/03/31
●	Universal Radio Communication Tester	R&S	CMW500	137681	2020/06/18	2021/06/17
● Tissue-equivalent liquids Validation						
●	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	2019/10/19	2020/10/18
● System Validation						
○	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	2020/08/11	2021/08/10
●	Power Viewer for Windows	R&S	N/A	N/A	N/A	N/A
●	Power sensor	R&S	NRP18A	101010	2020/08/11	2021/08/10
●	Power sensor	R&S	NRP18A	101386	2020/06/08	2021/06/07
●	Power Amplifier	BONN	BLWA 0160-2M	1811887	2019/11/14	2020/11/13
●	Dual Directional Coupler	Mini-Circuits	ZHDC-10-62-S+	F975001814	2019/11/14	2020/11/13
●	Attenuator	Mini-Circuits	VAT-3W2+	1819	2019/11/14	2020/11/13
●	Attenuator	Mini-Circuits	VAT-10W2+	1741	2019/11/14	2020/11/13

**Note:**

1. The Probe, Dipole and DAE 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 and the measured 10-g SAR within a frequency band is < 3.75 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.

Therefore, the measurement uncertainty is not required.



## 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.

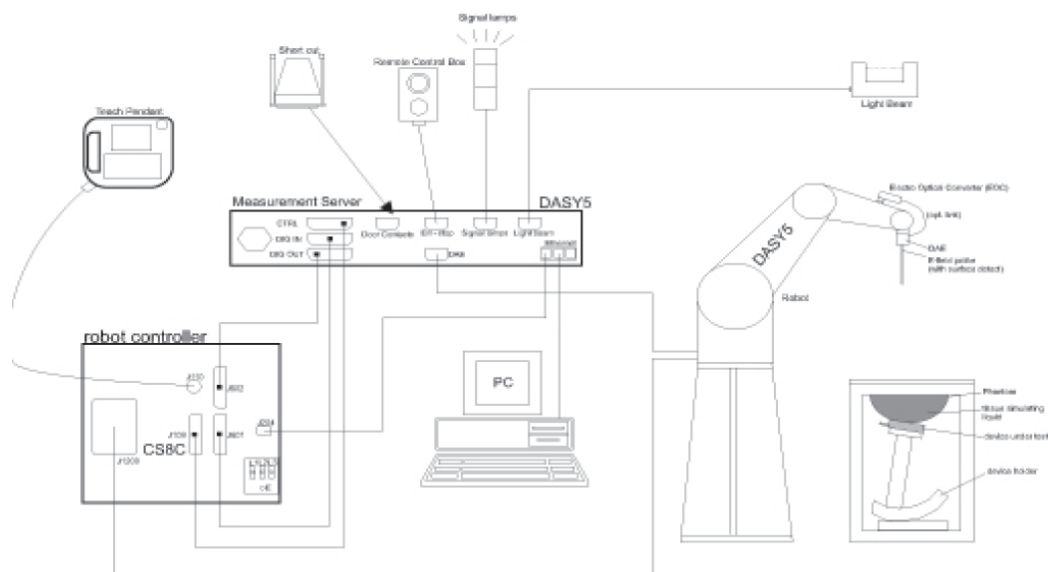
Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.

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

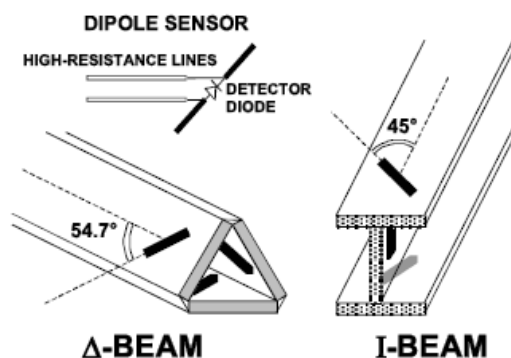
Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	4 MHz to 10 GHz; Linearity: $\pm 0.2$ dB (30 MHz to 6 GHz)
Directivity	$\pm 0.3$ dB in HSL (rotation around probe axis) $\pm 0.5$ dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 $\mu$ W/g to > 100 W/kg; Linearity: $\pm 0.2$ dB
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.



ELI 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

#### Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. Measure the local SAR at a test point within 8 mm of the phantom inner surface that is closest to the DUT. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

#### Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASYS software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal 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 IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

#### Area Scan Resolutions per FCC KDB Publication 865664 D01v04

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

**Step 3: Zoom Scan**

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

**Zoom Scan Resolutions per FCC KDB Publication 865664 D01v04**

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	
<p>Note: <math>\delta</math> is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.</p> <p>* 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 <math>\leq 1.4</math> W/kg, <math>\leq 8</math> mm, <math>\leq 7</math> mm and <math>\leq 5</math> 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.</p>				

**Step 4: Power drift measurement**

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1. The SAR drift shall be kept within  $\pm 5$  %.

## 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:	σ
	Density:	ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the 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. Dielectric Property Measurements & System Check

### 8.1. Tissue Dielectric Parameters

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within  $\pm 2^\circ\text{C}$  of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3-4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

The dielectric constant ( $\epsilon_r$ ) and conductivity ( $\sigma$ ) of typical tissue-equivalent media recipes are expected to be within  $\pm 5\%$  of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for  $\epsilon_r$  and  $\sigma$  may be relaxed to  $\pm 10\%$ . This is limited to frequencies  $\leq 3$  GHz.

#### Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Tissue dielectric parameters for Head and Body				
Target Frequency (MHz)	Head		Body	
	$\epsilon_r$	$\sigma(\text{S/m})$	$\epsilon_r$	$\sigma(\text{S/m})$
2450	39.2	1.80	52.7	1.95

#### IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013



**Dielectric Property Measurements Results:**

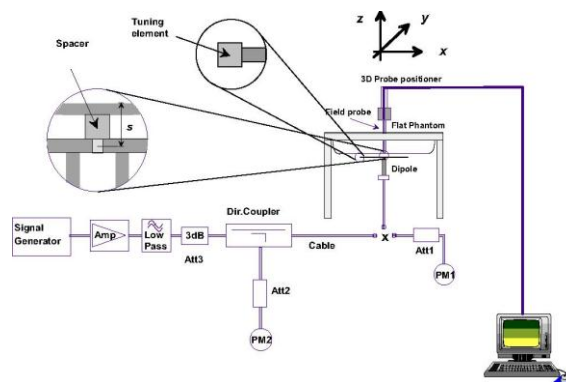
Dielectric performance of Head tissue simulating liquid									
Frequency (MHz)	$\epsilon_r$		$\sigma$ (S/m)		Delta ( $\epsilon_r$ )	Delta ( $\sigma$ )	Limit	Temp (°C)	Date
	Target	Measured	Target	Measured					
2450	39.20	37.44	1.800	1.737	-4.49%	-3.50%	±5%	22.5	2020-09-16

## 8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

### System Performance Check Measurement Conditions:

- ◆ The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness:  $2.0 \pm 0.2$  mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- ◆ The depth of tissue-equivalent liquid in a phantom must be  $\geq 15.0$  cm for SAR measurements  $\leq 3$  GHz and  $\geq 10.0$  cm for measurements  $> 3$  GHz.
- ◆ The DASY system with an E-Field Probe was used for the measurements.
- ◆ The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- ◆ The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
- ◆ For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- ◆ Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- ◆ The results are normalized to 1 W input power.



System Performance Check Setup

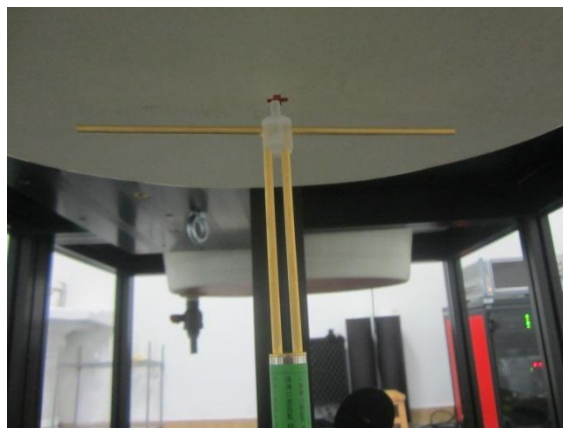


Photo of Dipole Setup

**System Check Result:**

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within  $\pm 10\%$  of the manufacturer calibrated dipole SAR target.

Head											
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	51.50	54.40	13.60	24.10	25.32	6.33	5.63%	5.06%	$\pm 10\%$	22.5	2020-09-16

## Plots of System Performance Check

### SystemPerformanceCheck-Head 2450MHz

DUT: D2450V2; Type: D2450V2; Serial: 1009

Date: 2020-09-16

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

Medium parameters used (interpolated):  $f = 2450$  MHz;  $\sigma = 1.737$  S/m;  $\epsilon_r = 37.442$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient Temperature: 22.1 °C; Liquid Temperature: 21.9 °C;

### DASY5 Configuration:

- Probe: EX3DV4 - SN7494; ConvF(7.91, 7.91, 7.91) @ 2450 MHz; Calibrated: 4/1/2020
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1549; Calibrated: 4/4/2020
- Phantom: Twin-SAM V8.0 ; Type: QD 000 P41 AA; Serial: 1974
- DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

**Head/d=10mm, Pin=250mW/Area Scan (41x61x1):** Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 23.6 W/kg

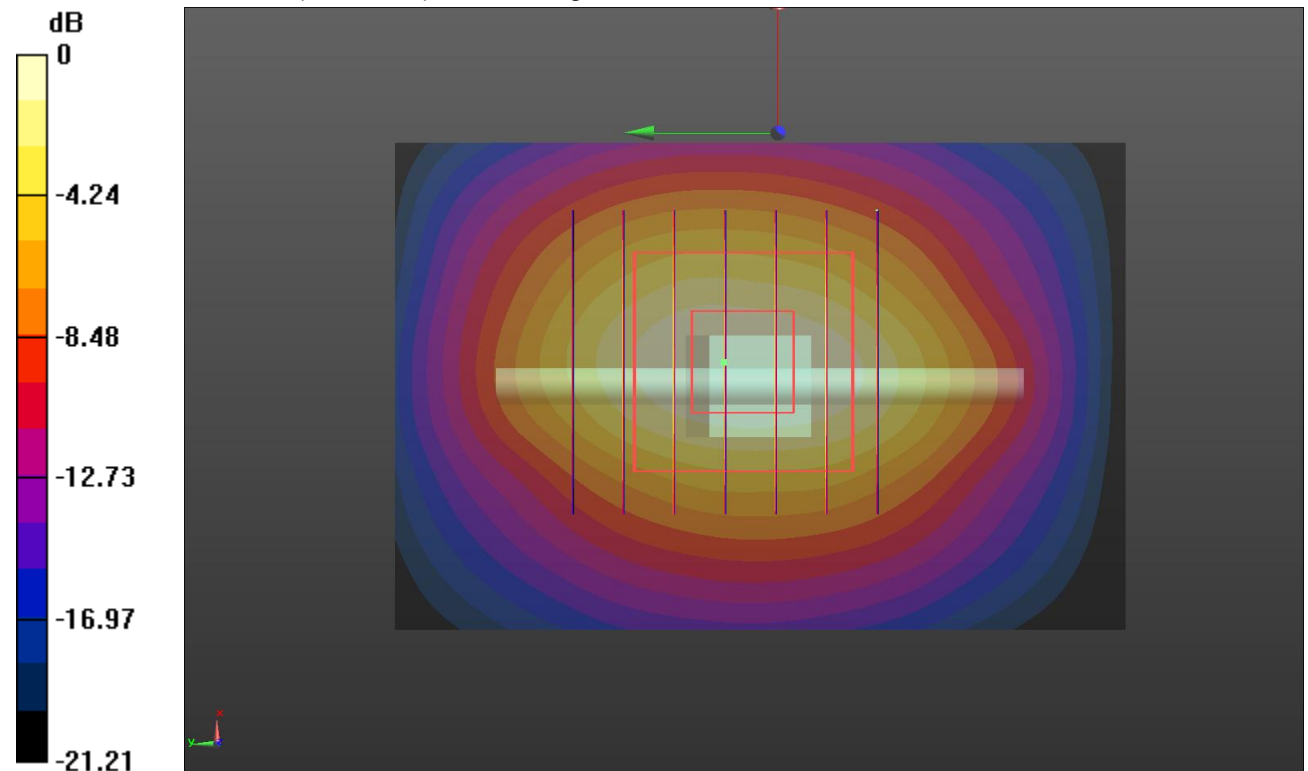
**Head/d=10mm, Pin=250mW/Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 115.8 V/m; Power Drift = -0.16 dB

Peak SAR (extrapolated) = 28.0 W/kg

**SAR(1 g) = 13.6 W/kg; SAR(10 g) = 6.33 W/kg**

Maximum value of SAR (measured) = 22.6 W/kg



0 dB = 22.6 W/kg = 13.54 dBW/kg

## 9. 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).

## 10. Conducted Power Measurement Results

### 10.1. Wi-Fi

For 2.4GHz Wi-Fi SAR testing, highest average RF output power channel for the lowest data rate for 802.11b were for SAR evaluation.

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.

SAR testing is not required for OFDM mode(s) 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.

Wi-Fi 2.4G				
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)
802.11b	1	2412	16.90	14.33
	6	2437	17.82	15.37
	11	2462	17.77	15.25
802.11g	1	2412	15.26	13.02
	6	2437	16.05	13.67
	11	2462	16.24	13.84
802.11n (HT20)	1	2412	15.05	12.72
	6	2437	15.98	14.00
	11	2462	16.16	14.38
802.11n (HT40)	3	2422	14.16	11.81
	6	2437	14.12	11.76
	9	2452	14.47	12.07

Wi-Fi 5G U-NII-3			
Mode	Channel	Frequency (MHz)	Conducted Average Power (dBm)
802.11ac (VHT20)	149	5745	5.35
	157	5785	5.13
	165	5825	4.96
802.11n (HT20)	149	5745	5.25
	157	5785	5.28
	165	5825	4.87
802.11a	149	5745	5.44
	157	5785	5.47
	165	5825	5.02
802.11ac (VHT40)	151	5755	5.31
	159	5795	5.01
802.11n (HT40)	151	5755	4.48
	159	5795	4.32
802.11ac (VHT80)	155	5775	4.36

## 10.2. Bluetooth

Bluetooth				
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)
GFSK	0	2402	3.34	3.31
	39	2441	<b>3.75</b>	<b>3.73</b>
	78	2480	3.43	3.42
$\pi/4$ QPSK	0	2402	2.69	2.65
	39	2441	3.26	3.20
	78	2480	3.06	3.02
8DPSK	0	2402	2.73	2.68
	39	2441	3.28	3.23
	78	2480	3.07	3.02
BLE	0	2402	-5.19	-5.20
	19	2440	-4.50	-4.53
	39	2480	-4.68	-4.70

## 11. Maximum Tune-up Limit

Wi-Fi 2.4G		
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power
802.11b	1	14.50
	6	15.50
	11	15.50
802.11g	1	13.50
	6	14.00
	11	14.00
802.11n(HT20)	1	13.00
	6	14.00
	11	14.50
802.11n(HT40)	3	12.00
	6	12.00
	9	12.50

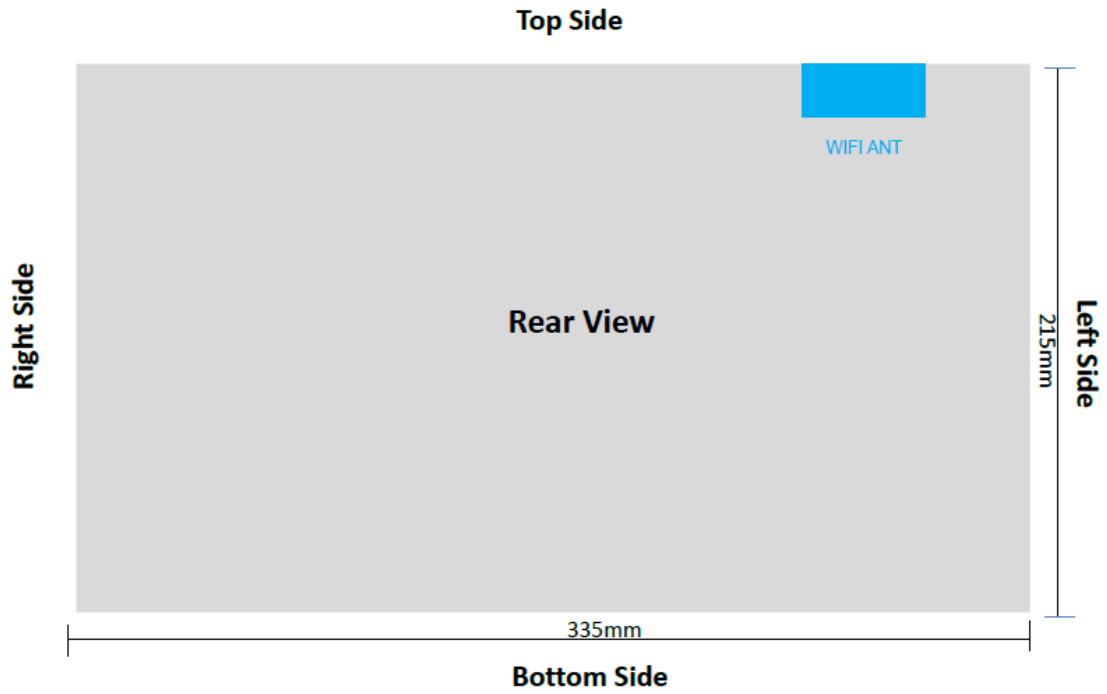
Wi-Fi 5G U-NII-3		
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power
802.11ac (VHT20)	149	5.50
	157	5.50
	165	5.00
802.11n (HT20)	149	5.50
	157	5.50
	165	5.00
802.11a	149	5.50
	157	5.50
	165	5.50
802.11ac (VHT40)	151	5.50
	159	5.50
802.11n (HT40)	151	4.50
	159	4.50
802.11ac (VHT80)	155	4.50



Bluetooth		
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power
GFSK	0	3.50
	39	4.00
	78	3.50
$\pi/4$ QPSK	0	3.00
	39	3.50
	78	3.50
8DPSK	0	3.00
	39	3.50
	78	3.50
BLE	0	-5.00
	19	-4.50
	39	-4.50

## 12. RF Exposure Conditions (Test Configurations)

### 12.1. Antenna Location



## 12.2. Standalone SAR test exclusion considerations

KDB 447498 with KDB 616217:

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

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$  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)  $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$  mW, for 100 MHz to 1500 MHz

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

### Antennas $\leq 50$ mm 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	2437	15.50	35	5	45	250	5	198	11.1 MEASURE	1.2 EXEMPT	$> 50$ mm	11.1 MEASURE	$> 50$ mm
WIFI 5G U-NII-3	5785	5.50	4	5	45	250	5	198	1.7 EXEMPT	0.2 EXEMPT	$> 50$ mm	1.7 EXEMPT	$> 50$ mm
Bluetooth	2441	4.00	3	5	45	250	5	198	0.8 EXEMPT	0.1 EXEMPT	$> 50$ mm	0.8 EXEMPT	$> 50$ mm

### Antennas $> 50$ mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		Power allowed at numeric threshold for 50 mm	separation distances (mm)					Calculated Threshold Value				
		dBm	mW		Rear	Left	Right	Top	Bottom	Rear	Left	Right	Top	Bottom
WIFI 2.4G	2437	15.50	35	96.1	5	45	250	5	198	$\leq 50$ mm	$\leq 50$ mm	2096 mW EXEMPT	$\leq 50$ mm	1576 mW EXEMPT
WIFI 5G U-NII-3	5785	5.50	4	62.4	5	45	250	5	198	$\leq 50$ mm	$\leq 50$ mm	2062 mW EXEMPT	$\leq 50$ mm	1542 mW EXEMPT
Bluetooth	2441	4.00	3	96.0	5	45	250	5	198	$\leq 50$ mm	$\leq 50$ mm	2096 mW EXEMPT	$\leq 50$ mm	1576 mW EXEMPT

## 12.3. 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	Yes	No	No	Yes	No
WIFI 5G U-NII-3	No	No	No	No	No
Bluetooth	No	No	No	No	No

## 13. Measured and Reported SAR 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.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is  $\leq 1.2$  W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is  $\leq 1.2$  W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

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.

Wi-Fi 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	6	2437	15.37	15.50	1.030	100%	1.00	-0.18	0.005	0.005	1
	Left	6	2437	15.37	15.50	1.030	100%	1.00	-	-	-	-
	Right	6	2437	15.37	15.50	1.030	100%	1.00	-	-	-	-
	Top	6	2437	15.37	15.50	1.030	100%	1.00	-0.08	0.004	0.004	-
	Bottom	6	2437	15.37	15.50	1.030	100%	1.00	-	-	-	-

SAR Test Data Plots to the Appendix A.

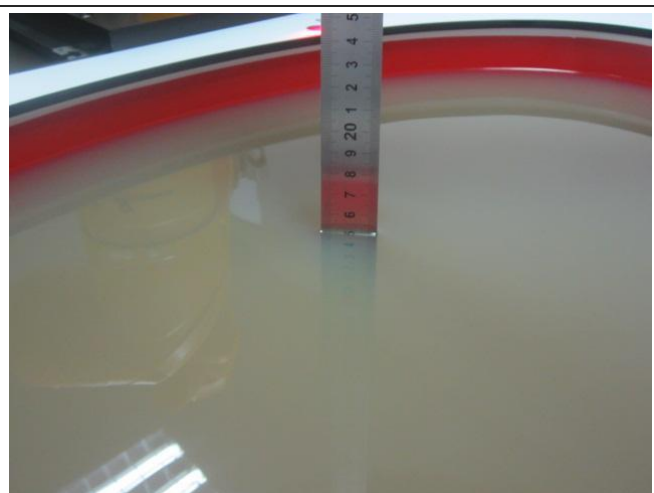
## 14. SAR Measurement Variability

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

- 1) Repeated measurement is not required when the original highest measured SAR is  $<0.8$  or  $2$  W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is  $\geq 0.8$  or  $2$  W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is  $> 1.20$  or when the original or repeated measurement is  $\geq 1.45$  or  $3.6$  W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first, or second repeated measurement is  $\geq 1.5$  or  $3.75$  W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is  $> 1.20$ .

Band	Test Position	Frequency		Highest Measured SAR (W/kg)	First Repeated		Second Repeated	
		CH	MHz		Measured SAR(W/kg)	Largest to Smallest SAR Ratio	Measured SAR(W/kg)	Largest to Smallest SAR Ratio
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

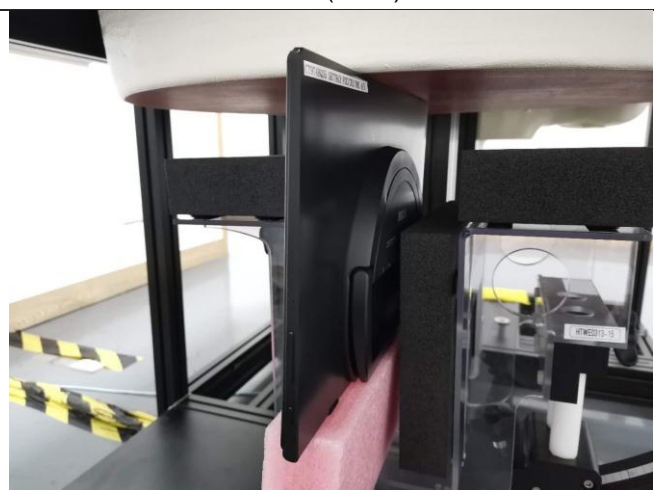
## 15. TestSetup Photos



Liquid depth in the Body phantom



Rear (0mm)



Top Side (0mm)

## 16. External and Internal Photos of the EUT

Please reference to the report No.: CHTEW20090156

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