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SAR EVALUATION REPORT

Applicant Name:
Samsung Electronics Co., Ltd.
129, Samsung-ro, Maetan dong,
Yeongtong-gu, Suwon-si
Gyeonggi-do, 16677, Korea

Date of Testing:
08/04/2024-08/19/2024
Test Site/Location:
Element, Columbia, MD, USA
Document Serial No.:
1M2407080057-01.A3L

FCC ID: **A3LNP750XQA**

APPLICANT: **SAMSUNG ELECTRONICS CO., LTD.**

DUT Type: Portable Computing Device
Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Model(s): NP750XQA
Additional Model(s): NP754XQA

Equipment Class	Band & Mode	Tx Frequency	SAR 1g Body (W/kg)
DTS	2.4 GHz WIFI	2412 - 2472 MHz	**0.14**
NII	5 GHz WIFI	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5500 - 5720 MHz U-NII-3: 5745 - 5825 MHz U-NII-4: 5845 - 5885 MHz	**0.74***
6CD	6 GHz WIFI	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6875 MHz U-NII-8: 6895 - 7115 MHz	**0.42***
DSS	2.4 GHz Bluetooth	2402 - 2480 MHz	**0.79**
Simultaneous SAR per KDB 690783 D01v01r03:			**1.53**

Equipment Class	Band & Mode	Tx Frequency	APD (W/m^2)	Reported PD (W/m^2)
			Body	Body
6CD	6 GHz WIFI	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6875 MHz U-NII-8: 6895 - 7115 MHz	2.29*	5.21*

Note: * SAR/APD/PD values represent RF exposure during MIMO operations.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.9 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

RJ Ortanez
Executive Vice President

The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: sartick@mwfai.info.

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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz WIFI	Data	2412 - 2472 MHz
5 GHz WIFI	Data	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5500 - 5720 MHz U-NII-3: 5745 - 5825 MHz U-NII-4: 5845 - 5885 MHz
6 GHz WIFI	Data	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6875 MHz U-NII-8: 6895 - 7115 MHz
2.4 GHz Bluetooth	Data	2402 - 2480 MHz

1.2 Power Reduction for SAR

The only power reduction implemented in this device is when 5GHz WLAN reduces in RSDB/DBS conditions. Due to equipment limitation measurements for the RSDB and DBS scenarios cannot be taken in real time and therefore not available.

1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

Note: Targets for 802.11ax/be RU operations can be found in 802.11ax/be RU SAR Exclusion Appendix.

1.3.1 2.4 GHz SISO/MIMO WLAN Output Power

Band	IEEE 802.11 Modulated Output Power (in dBm)																					
	SISO										MIMO											
	Antenna 2										MIMO											
	b		g		n		ax (SU)		be (SU)		b (CDD + STBC)		g (CDD + STBC)		n (CDD + STBC, SDM)		ax (SU) (CDD + STBC, SDM)		be (SU) (CDD + STBC, SDM)	
Maximum / Nominal Power	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
2.4 GHz WLAN	15.5	14.5	15.5	14.5	15.5	14.5	15.5	14.5	15.5	14.5	18.5	17.5	18.5	17.5	18.5	17.5	18.5	17.5	18.5	17.5
					ch. 1: 14.0 ch. 10: 10.5	13.0 9.5									ch. 1: 17.0 ch. 10: 13.5	16.0 12.5				
	ch. 12: 4.0 ch. 13: 0.0	3.0 -1.0	ch. 11: 14.5 ch. 12: 4.0 ch. 13: 0.0	13.5 3.0 -1.0	ch. 11: 9.0 ch. 12: 1.5 ch. 13: 0.0	8.0 0.5 -1.0	ch. 12: 4.0 ch. 13: 0.0	3.0 -1.0	ch. 12: 4.0 ch. 13: 0.0	3.0 -1.0	ch. 12: 7.0 ch. 13: 3.0	6.0 2.0	ch. 11: 17.5 ch. 12: 7.0 ch. 13: 3.0	16.5 6.0 2.0	ch. 11: 12.0 ch. 12: 4.5 ch. 13: 3.0	11.0 3.5 2.0	ch. 12: 7.0 ch. 13: 3.0	6.0 2.0	ch. 12: 7.0 ch. 13: 3.0	6.0 2.0

1.3.2 5 GHz MIMO WLAN Output Power

The below table is applicable in the following conditions:

- Maximum Power

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)									
		MIMO									
		a (CDD + STBC)		n (CDD + STBC, SDM)		ac (CDD + STBC, SDM)		ax (SU) (CDD + STBC, SDM)		be (SU) (CDD + STBC, SDM)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
5 GHz WIFI (20MHz BW)	UNII-1	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2A	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2C	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-3	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-4	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
5 GHz WIFI (40MHz BW)	UNII-1			15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2A			15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2C			15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-3			15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
	UNII-4			15.0	14.0	15.0	14.0	15.0	14.0	15.0	14.0
5 GHz WIFI (80MHz BW)	UNII-1					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2A					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2C					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-3					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-4					15.0	14.0	15.0	14.0	15.0	14.0
5 GHz WIFI (160MHz BW)	UNII-1/2A					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-2C					15.0	14.0	15.0	14.0	15.0	14.0
	UNII-3/4					15.0	14.0	15.0	14.0	15.0	14.0

The below table is applicable in the following conditions:

- During conditions when 2.4 GHz WLAN is active

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)									
		MIMO									
		a (CDD + STBC)		n (CDD + STBC, SDM)		ac (CDD + STBC, SDM)		ax (SU) (CDD + STBC, SDM)		be (SU) (CDD + STBC, SDM)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
5 GHz WIFI (20MHz BW)	UNII-1	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2A	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2C	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-3	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-4	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
5 GHz WIFI (40MHz BW)	UNII-1			12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2A			12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2C			12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-3			12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
	UNII-4			12.0	11.0	12.0	11.0	12.0	11.0	12.0	11.0
5 GHz WIFI (80MHz BW)	UNII-1					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2A					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2C					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-3					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-4					12.0	11.0	12.0	11.0	12.0	11.0
5 GHz WIFI (160MHz BW)	UNII-1/2A					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-2C					12.0	11.0	12.0	11.0	12.0	11.0
	UNII-3/4					12.0	11.0	12.0	11.0	12.0	11.0

1.3.3 6 GHz MIMO WLAN Output Power

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)					
		MIMO					
		a (CDD + STBC)		ax (SU) (CDD + STBC, SDM)		be (SU) (CDD + STBC, SDM)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
6 GHz WIFI (20MHz BW) - SP	UNII-5/7	12.0 ch. 2: 5.5	11.0 4.5	12.0 ch. 2: 5.5	11.0 4.5	12.0 ch. 2: 5.5	11.0 4.5
6 GHz WIFI (40MHz BW) - SP	UNII-5/7			12.0	11.0	12.0	11.0
6 GHz WIFI (80MHz BW) - SP	UNII-5/7			12.0	11.0	12.0	11.0
6 GHz WIFI (160MHz BW) - SP	UNII-5/7			12.0	11.0	12.0	11.0
6 GHz WIFI (320MHz BW) - SP	UNII-5					12.0	11.0

Mode	Band	IEEE 802.11 Modulated Output Power (in dBm)					
		MIMO					
		a (CDD + STBC)		ax (SU) (CDD + STBC, SDM)		be (SU) (CDD + STBC, SDM)	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.
6 GHz WIFI (20MHz BW) - LPI	UNII-5/6/7/8	7.5 ch. 2: 5.5	6.5 4.5	7.5 ch. 2: 5.5	6.5 4.5	7.5 ch. 2: 5.5	6.5 4.5
6 GHz WIFI (40MHz BW) - LPI	UNII-5/6/7/8			10.0	9.0	10.0	9.0
6 GHz WIFI (80MHz BW) - LPI	UNII-5/6/7/8			12.0	11.0	12.0	11.0
6 GHz WIFI (160MHz BW) - LPI	UNII-5/6/7/8			12.0	11.0	12.0	11.0
6 GHz WIFI (320MHz BW) - LPI	UNII-5/6/7/8					12.0	11.0

1.3.4 2.4 GHz Bluetooth Output Power

Mode	Data Rate	Modulated Output Power (in dBm)							
		Single Antenna				Each Chain in Dual Mode			
		Antenna 1		Antenna 2		Antenna 1 in Dual Mode		Antenna 2 in Dual Mode	
Maximum / Nominal Power		Max	Nom.	Max	Nom.	Max	Nom.	Max	Nom.
Bluetooth	1Mbps	17.5	16.5	17.5	16.5	14.0	13.0	14.0	13.0
Bluetooth EDR	2Mbps	15.5	14.5	15.5	14.5	12.0	11.0	12.0	11.0
Bluetooth EDR	3Mbps	15.5	14.5	15.5	14.5	12.0	11.0	12.0	11.0
Bluetooth LE	1Mbps	16.0	15.0	16.0	15.0	12.0	11.0	12.0	11.0
Bluetooth LE	2Mbps	16.0	15.0	16.0	15.0	12.0	11.0	12.0	11.0
Bluetooth LE	125kbps	8.0	8.0	N/A	N/A	N/A	N/A	N/A	N/A
Bluetooth LE	500kbps	8.0	8.0	N/A	N/A	N/A	N/A	N/A	N/A

1.4 DUT Antenna Locations

The overall dimensions of this device is > 200 mm. A diagram showing the location of the device antennas can be found in the DUT Antenna Diagram and SAR Test Setup Photographs Appendix H. Exact dimensions and separation distances are shown in the Technical Descriptions in the FCC filings.

Table 1-1
Device Edges/Sides for SAR Testing Laptop Mode

Antenna	Back	Front	Top	Bottom	Right	Left
1	No	No	No	Yes	No	No
2	No	No	No	Yes	No	No
MIMO	No	No	No	Yes	No	No

Note: Per FCC KDB Publication 616217 D04v01r01, particular edges were not required to be evaluated for SAR based on the SAR exclusion threshold in KDB 447498 D01v06. Additional edges may have been evaluated for simultaneous transmission analysis.

1.5 Simultaneous Transmission Capabilities

According to FCC KDB Publication 447498 D01v06, transmitters are considered to be operating simultaneously when there is overlapping transmission, with the exception of transmissions during network hand-offs with maximum hand-off duration less than 30 seconds.

This device contains multiple transmitters that may operate simultaneously, and therefore requires a simultaneous transmission analysis according to FCC KDB Publication 447498 D01v06 4.3.2 procedures.

Table 1-2
Simultaneous Transmission Scenarios

No.	Capable Transmit Configuration
1	2.4 GHz Bluetooth Ant 1
2	2.4 GHz Bluetooth Ant 2
3	2.4 GHz Bluetooth Dual
4	2.4 GHz WLAN Ant 2
5	2.4 GHz WLAN MIMO
6	5 GHz WLAN MIMO
7	6 GHz WLAN MIMO
8	2.4 GHz WLAN MIMO + 5 GHz WLAN MIMO
9	2.4 GHz WLAN MIMO + 6 GHz WLAN MIMO
10	2.4 GHz WLAN Ant 2 + 5 GHz WLAN MIMO
11	2.4 GHz WLAN Ant 2 + 6 GHz WLAN MIMO
12	2.4 GHz Bluetooth Ant 1 + 2.4 GHz WLAN Ant 2
13	2.4 GHz Bluetooth Ant 1 + 5 GHz WLAN MIMO
14	2.4 GHz Bluetooth Ant 1 + 6 GHz WLAN MIMO
15	2.4 GHz Bluetooth Ant 2 + 5 GHz WLAN MIMO
16	2.4 GHz Bluetooth Ant 2 + 6 GHz WLAN MIMO
17	2.4 GHz Bluetooth Dual + 5 GHz WLAN MIMO
18	2.4 GHz Bluetooth Dual + 6 GHz WLAN MIMO
19	2.4 GHz Bluetooth Ant 1 + 2.4 GHz WLAN Ant 2 + 5 GHz WLAN MIMO
20	2.4 GHz Bluetooth Ant 1 + 2.4 GHz WLAN Ant 2 + 6 GHz WLAN MIMO

1. This device supports 2x2 MIMO Tx for WLAN 802.11b/a/g/n/ac/ax/be. 802.11b/a/g/n/ac/ax/be supports CDD and STBC and 802.11n/ac/ax/be additionally supports SDM.
2. This device supports Bluetooth Tethering.
3. 2.4 GHz WLAN Antenna 2 and 2.4 GHz Bluetooth Antenna 2 share the same antenna path and cannot transmit simultaneously.
4. 5 GHz WLAN and 6 GHz WLAN share the same antenna path and cannot transmit simultaneously.

1.6 Miscellaneous SAR Test Considerations

(A) WIFI/BT

Since U-NII-1 and U-NII-2A bands have the same maximum output power and the highest reported SAR for U-NII-2A is less than 1.2 W/kg, SAR is not required for U-NII-1 band according to FCC KDB Publication 248227 D01v02r02.

This device supports IEEE 802.11ac with the following features:

a) Up to 160 MHz Bandwidth only
b) No aggregate channel configurations
c) 2 Tx antenna output
d) 256 QAM is supported
e) TDWR and Band gap channels are supported

This device supports IEEE 802.11ax/be with the following features:

a) Up to 320 MHz Bandwidth only for 6 GHz
b) Up to 160 MHz Bandwidth only for 5/6 GHz
c) Up to 20 MHz Bandwidth only for 2.4GHz
d) 2 Tx antenna output
e) Up to 1024 QAM is supported
f) TDWR and Band gap channels are supported for 5/6 GHz
g) MU-MIMO UL Operations are not supported

Per FCC Guidance, 802.11ax/be RU/MRU was considered a higher order 802.11 mode when compared to a/b/g/n/ac/be to apply KDB Publication 248227 D01v02r02 for OFDM mode selection. Therefore, SAR tests were not required for 802.11ax/be RU/MRU based on the maximum allowed output powers of OFDM modes and the reported SAR values. Per FCC Guidance, maximum conducted powers were performed for each RU/MRU size to demonstrate that the output powers would not be higher than the other OFDM 802.11 modes. Please see Measurement Reports SNs: 1M2407080057-05.A3L, 1M2407080057-07.A3L, 1M2407080057-09.A3L for 802.11ax/be RU/MRU output powers.

This device supports channel 1-13 for 2.4 GHz WLAN. However, because channel 12/13 targets are not higher than that of channels 1-11, channels 1, 6, and 11 were considered for SAR testing per FCC KDB 248227 D01V02r02.

Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. FCC KDB 648474 and FCC KDB 248227 were followed for test positions, distances, and modes. Per TCB workshop October 2020 notes, 5 channels were tested. Absorbed power density (APD) using a 4cm2 averaging area is reported based on SAR measurements. Incident power density is evaluated at 2mm ensuring that the resolution is sufficient such that integrated power density (iPD) between d=2mm and d=λ/5mm is ≥ -1dB per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%.

1.7 Guidance Applied

- IEEE 1528-2013
- FCC KDB Publication 248227 D01v02r02 (SAR Considerations for 802.11 Devices)
- FCC KDB Publication 447498 D01v06 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)
- April 2019 TCB Workshop Notes (IEEE 802.11ax/be)
- FCC KDB 648474 D04 (Accessories)
- FCC KDB Publication 616217 D04v01r02 (Laptop)
- IEC 62479:2010
- SPEAG DASY6 System Handbook
- IEC/IEEE 63195-1:2022

- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)
- November 2017, October 2018, April 2019, November 2019, October 2020 TCBC Workshop Notes

1.8 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 9 and Section 10.

2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

2.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

Equation 2-1
SAR Mathematical Equation

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

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

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

where:

σ = conductivity of the tissue-simulating material (S/m)
ρ = mass density of the tissue-simulating material (kg/m^3)
E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

3 DOSIMETRIC ASSESSMENT

3.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

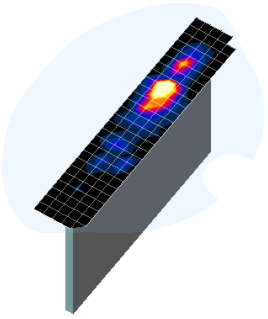

Figure 3-1
Sample SAR Area Scan

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 3-1) and IEEE 1528-2013.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 3-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):

   a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).

   b. 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. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.

   c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

Table 3-1
Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

Frequency	Maximum Area Scan Resolution (mm) (Δx_{area}, Δy_{area})	Maximum Zoom Scan Resolution (mm) (Δx_{zoom}, Δy_{zoom})	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid	Graded Grid		
			$\Delta z_{zoom}(n)$	$\Delta z_{zoom}(1)$*	$\Delta z_{zoom}(n>1)$*	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5*$\Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5*$\Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5*$\Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5*$\Delta z_{zoom}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5*$\Delta z_{zoom}(n-1)$	≥ 22

*Also compliant to IEEE 1528-2013 Table 6

4 TEST CONFIGURATION POSITIONS

4.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity ε = 3 and loss tangent δ = 0.02.

4.2 SAR Testing for Laptop per KDB Publication 616217 D04v01r02

Per FCC KDB Publication 616217 D04v01r02, When antennas are incorporated in the keyboard section of a laptop computer, SAR is required for the bottom surface of the keyboard. The SAR Exclusion Threshold in KDB 447498 D01v06 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent laptop edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.

5 RF EXPOSURE LIMITS

5.1 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.

5.2 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.

5.3 RF Exposure Limits for Frequencies Below 6 GHz

Table 5-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT *General Population* (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT *Occupational* (W/kg) or (mW/g)
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

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.

5.4 RF Exposure Limits for Frequencies Above 6 GHz

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m^2 or mW/cm^2.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm^2 per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Table 5-2
Human Exposure Limits Specified in FCC 47 CFR §1.1310

Human Exposure to Radiofrequency (RF) Radiation Limits		
Frequency Range [MHz]	**Power Density** [mW/cm^2]	**Average Time** [Minutes]
(A) Limits For Occupational / Controlled Environments		
1,500 – 100,000	5.0	6
(B) Limits For General Population / Uncontrolled Environments		
1,500 – 100,000	1.0	30

Note: 1.0 mW/cm^2 is 10 W/m^2

6 FCC MEASUREMENT PROCEDURES

Power measurements for licensed transmitters are performed using a base station simulator under digital average power.

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

6.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations of 802.11 transmitters are not suitable for SAR measurements. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 D01v02r02 for more details.

6.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters.

A periodic duty factor is required for current generation SAR systems to measure SAR. 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 is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

6.2.2 U-NII-1 and U-NII-2A

For devices that operate in both U-NII-1 and U-NII-2A bands, when the same maximum output power is specified for both bands, SAR measurement using OFDM SAR test procedures is not required for U-NII-1 unless the highest reported SAR for U-NII-2A is > 1.2 W/kg. When different maximum output powers are specified for the bands, SAR measurement for the U-NII band with the lower maximum output power is not required unless the highest reported SAR for the U-NII band with the higher maximum output power, adjusted by the ratio of lower to higher specified maximum output power for the two bands, is > 1.2 W/kg. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.2.3 U-NII-2C and U-NII-3

The frequency range covered by U-NII-2C and U-NII-3 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, the channels at 5.60 – 5.65 GHz in U-NII-2C band must be disabled with acceptable mechanisms and documented in the equipment certification. Unless band gap channels are permanently disabled, SAR must be considered for these channels. Each band is tested independently according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

6.2.4 2.4 GHz SAR Test Requirements

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:

1) When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.

2) 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.

2.4 GHz 802.11 g/n/ax 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. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.2.5 OFDM Transmission Mode and SAR Test Channel Selection

When the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11a, 802.11n and 802.11ac or 802.11g and 802.11n with the same channel bandwidth, modulation and data rate etc., the lower order 802.11 mode i.e., 802.11a, then 802.11n and 802.11ac or 802.11g then 802.11n, is used for SAR measurement. Per April 2019 TCB Workshop guidance, 802.11ax was considered the highest order 802.11 mode. When the maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

6.2.6 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is ≤ 1.2 W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.2.7 MIMO SAR considerations

Per KDB Publication 248227 D01v02r02, the simultaneous SAR provisions in KDB Publication 447498 D01v06 should be applied to determine simultaneous transmission SAR test exclusion for WIFI MIMO. If the sum of 1g single transmission chain SAR measurements is <1.6 W/kg, no additional SAR measurements for MIMO are required. Alternatively, SAR for MIMO can be measured with all antennas transmitting simultaneously at the specified maximum output power of MIMO operation. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7 RF CONDUCTED POWERS

7.1 WLAN Conducted Powers

Table 7-1
2.4 GHz WLAN Maximum Average RF Power – Antenna 2

2.4GHz WIFI (20MHz 802.11b SISO ANT2)			
Freq. [MHz]	**Channel**	**Detector**	**Conducted Power [dBm]**
2412	1	Average	14.76
2437	6		14.88
2462	11		14.77
2467	12		3.87
2472	13		-0.64
2.4GHz WIFI (20MHz 802.11g SISO ANT2)			
Freq. [MHz]	**Channel**	**Detector**	**Conducted Power [dBm]**
2412	1	Average	14.92
2437	6		15.04
2462	11		13.86
2467	12		3.48
2472	13		-0.62
2.4GHz WIFI (20MHz 802.11n SISO ANT2)			
Freq. [MHz]	**Channel**	**Detector**	**Conducted Power [dBm]**
2412	1	Average	13.91
2437	6		15.05
2457	10		10.22
2462	11		8.79
2467	12		1.47
2472	13		-0.69
2.4GHz WIFI (20MHz 802.11ax SISO ANT2)			
Freq. [MHz]	**Channel**	**Detector**	**Conducted Power [dBm]**
2412	1	Average	14.80
2437	6		14.89
2462	11		14.90
2467	12		3.53
2472	13		-0.49
2.4GHz WIFI (20MHz 802.11be SISO ANT2)			
Freq. [MHz]	**Channel**	**Detector**	**Conducted Power [dBm]**
2412	1	Average	14.95
2437	6		14.98
2462	11		14.91
2467	12		3.59
2472	13		-0.45

Table 7-2
2.4 GHz WLAN Maximum Average RF Power – MIMO

2.4GHz WIFI (20MHz 802.11b MIMO)					
Freq [MHz]	Channel	Detector	Conducted Power [dBm]		
			ANT1	ANT2	MIMO
	1	Average	14.28	15.17	17.76
	6		14.38	15.39	17.92
	11		14.63	15.31	17.99
	12		2.96	3.82	6.42
	13		-1.03	-0.25	2.39
2.4GHz WIFI (20MHz 802.11g MIMO)					
Freq [MHz]	Channel	Detector	Conducted Power [dBm]		
			ANT1	ANT2	MIMO
	1	Average	14.43	15.22	17.85
	6		14.01	14.96	17.52
	11		13.13	13.82	16.50
	12		2.99	3.87	6.46
	13		-1.12	-0.31	2.31
2.4GHz WIFI (20MHz 802.11n MIMO)					
Freq [MHz]	Channel	Detector	Conducted Power [dBm]		
			ANT1	ANT2	MIMO
	1	Average	13.14	13.99	16.60
	6		14.02	14.98	17.54
	10		9.14	10.26	12.75
	11		8.33	8.82	11.59
	12		1.11	1.49	4.31
	13		-1.16	-0.35	2.27
2.4GHz WIFI (20MHz 802.11ax MIMO)					
Freq [MHz]	Channel	Detector	Conducted Power [dBm]		
			ANT1	ANT2	MIMO
	1	Average	14.42	15.29	17.89
	6		14.04	14.99	17.55
	11		14.01	14.93	17.50
	12		2.95	3.85	6.43
	13		-1.40	-0.63	2.01
2.4GHz WIFI (20MHz 802.11be MIMO)					
Freq [MHz]	Channel	Detector	Conducted Power [dBm]		
			ANT1	ANT2	MIMO
	1	Average	14.49	15.37	17.96
	6		13.97	14.98	17.51
	11		14.01	14.92	17.50
	12		3.12	3.98	6.58
	13		-1.41	-0.58	2.04

Table 7-3
5 GHz WLAN Maximum Average RF Power – MIMO

5GHz WIFI (80MHz 802.11ac MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	11.82	11.72	14.78
UNII-2A	5290	58	11.99	11.50	14.76
UNII-2C	5530	106	11.69	10.91	14.33
	5610	122	11.78	11.39	14.60
	5690	138	11.91	11.02	14.50
UNII-3	5775	155	11.79	11.07	14.46
UNII-4	5855	171	11.68	11.02	14.37
5GHz WIFI (80MHz 802.11ax MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	11.57	11.56	14.58
UNII-2A	5290	58	11.71	11.38	14.56
UNII-2C	5530	106	11.85	11.20	14.55
	5610	122	11.98	11.62	14.81
	5690	138	11.61	10.91	14.28
UNII-3	5775	155	11.53	10.85	14.21
UNII-4	5855	171	11.97	11.38	14.70
5GHz WIFI (80MHz 802.11be MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	11.64	11.59	14.63
UNII-2A	5290	58	11.74	11.43	14.60
UNII-2C	5530	106	11.81	11.25	14.55
	5610	122	11.95	11.64	14.81
	5690	138	11.57	10.97	14.29
UNII-3	5775	155	11.58	10.87	14.25
UNII-4	5855	171	11.48	10.93	14.22

Table 7-4
5 GHz WLAN Reduced Average RF Power with 2.4 GHz WLAN Active – MIMO

5GHz WIFI (80MHz 802.11ac MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	8.32	7.49	10.94
UNII-2A	5290	58	8.22	7.58	10.92
UNII-2C	5530	106	8.98	7.34	11.25
	5610	122	8.81	7.91	11.39
	5690	138	8.90	7.30	11.18
UNII-3	5775	155	8.89	7.52	11.27
UNII-4	5855	171	8.78	7.28	11.10
5GHz WIFI (80MHz 802.11ax MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	8.39	7.94	11.18
UNII-2A	5290	58	8.45	8.00	11.24
UNII-2C	5530	106	8.44	7.80	11.14
	5610	122	8.54	7.73	11.16
	5690	138	8.79	7.16	11.06
UNII-3	5775	155	8.58	7.45	11.06
UNII-4	5855	171	8.51	7.01	10.83
5GHz WIFI (80MHz 802.11be MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-1	5210	42	8.63	8.01	11.34
UNII-2A	5290	58	8.55	8.06	11.32
UNII-2C	5530	106	8.48	7.87	11.20
	5610	122	8.52	7.78	11.18
	5690	138	8.82	7.16	11.08
UNII-3	5775	155	8.64	7.50	11.12
UNII-4	5855	171	8.53	7.04	10.86

Table 7-5
6 GHz WLAN Maximum Average RF Power - MIMO

6GHz WIFI (80MHz 802.11ax MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-5	5985	7	8.63	7.99	11.33
	6145	39	8.82	8.69	11.77
	6305	71	8.57	8.66	11.63
	6385	87	8.15	8.58	11.38
UNII-6	6465	103	8.49	8.82	11.67
UNII-7	6545	119	8.58	8.97	11.79
	6705	151	8.69	8.35	11.53
	6785	167	8.77	8.56	11.68
	6865	183	8.93	8.76	11.86
UNII-8	6945	199	8.68	7.99	11.36
	7025	215	8.54	7.97	11.27
6GHz WIFI (80MHz 802.11be MIMO)					
Band	Freq [MHz]	Channel	Avg. Conducted Powers [dBm]		
			ANT1	ANT2	MIMO
UNII-5	5985	7	8.80	7.80	11.34
	6145	39	8.40	8.22	11.32
	6305	71	8.22	8.11	11.18
	6385	87	8.30	8.50	11.41
UNII-6	6465	103	8.35	8.27	11.32
UNII-7	6545	119	8.32	8.36	11.35
	6705	151	8.80	8.32	11.58
	6785	167	8.70	8.20	11.47
	6865	183	8.80	8.33	11.58
UNII-8	6945	199	8.99	8.01	11.54
	7025	215	8.90	8.23	11.59

Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with the same maximum output power specification, powers were measured for the largest channel bandwidth, lowest order modulation and lowest data rate.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.
- For each transmission mode configuration, powers were measured for the highest and lowest channels; and at the mid-band channel(s) when there were at least 3 channels supported. For configurations with multiple mid-band channels, due to an even number of channels, both channels were measured.

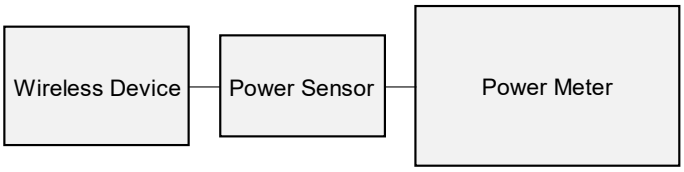

Figure 7-1
Power Measurement Setup

7.2 Bluetooth Conducted Powers

Table 7-6
Bluetooth Maximum Average RF Power – Antenna 1

Frequency [MHz]	Data Rate [Mbps]	Channel No.	Avg Conducted Power	
			[dBm]	[mW]
2402	1.0	0	16.54	45.051
2441	1.0	39	17.30	53.716
2480	1.0	78	16.23	42.015
2402	2.0	0	14.91	30.946
2441	2.0	39	15.45	35.051
2480	2.0	78	14.62	29.000
2402	3.0	0	14.92	31.017
2441	3.0	39	15.46	35.116
2480	3.0	78	14.69	29.444

Table 7-7
Bluetooth Maximum Average RF Power – Antenna 2

Frequency [MHz]	Data Rate [Mbps]	Channel No.	Avg Conducted Power	
			[dBm]	[mW]
2402	1.0	0	16.32	42.815
2441	1.0	39	16.85	48.384
2480	1.0	78	15.98	39.610
2402	2.0	0	14.82	30.353
2441	2.0	39	15.43	34.914
2480	2.0	78	14.33	27.108
2402	3.0	0	14.85	30.535
2441	3.0	39	15.43	34.930
2480	3.0	78	14.35	27.227

Table 7-9
Bluetooth Maximum Average RF Power – Antenna Dual Mode

Frequency [MHz]	Data Rate [Mbps]	Channel No.	Avg Conducted Power Ant 1		Avg Conducted Power Ant 2		Avg Conducted Power MIMO	
			[dBm]	[mW]	[dBm]	[mW]	[dBm]	[mW]
2402	1.0	0	13.39	21.822	12.92	19.606	16.17	41.429
2441	1.0	39	13.71	23.469	12.55	17.997	16.18	41.466
2480	1.0	78	12.38	17.286	11.63	14.555	15.03	31.841
2402	2.0	0	11.62	14.528	11.47	14.022	14.56	28.549
2441	2.0	39	11.99	15.827	10.91	12.320	14.49	28.147
2480	2.0	78	10.88	12.246	9.95	9.887	13.45	22.134
2402	3.0	0	11.67	14.679	11.28	13.412	14.49	28.091
2441	3.0	39	11.99	15.802	11.08	12.817	14.57	28.619
2480	3.0	78	10.97	12.508	9.96	9.901	13.50	22.409

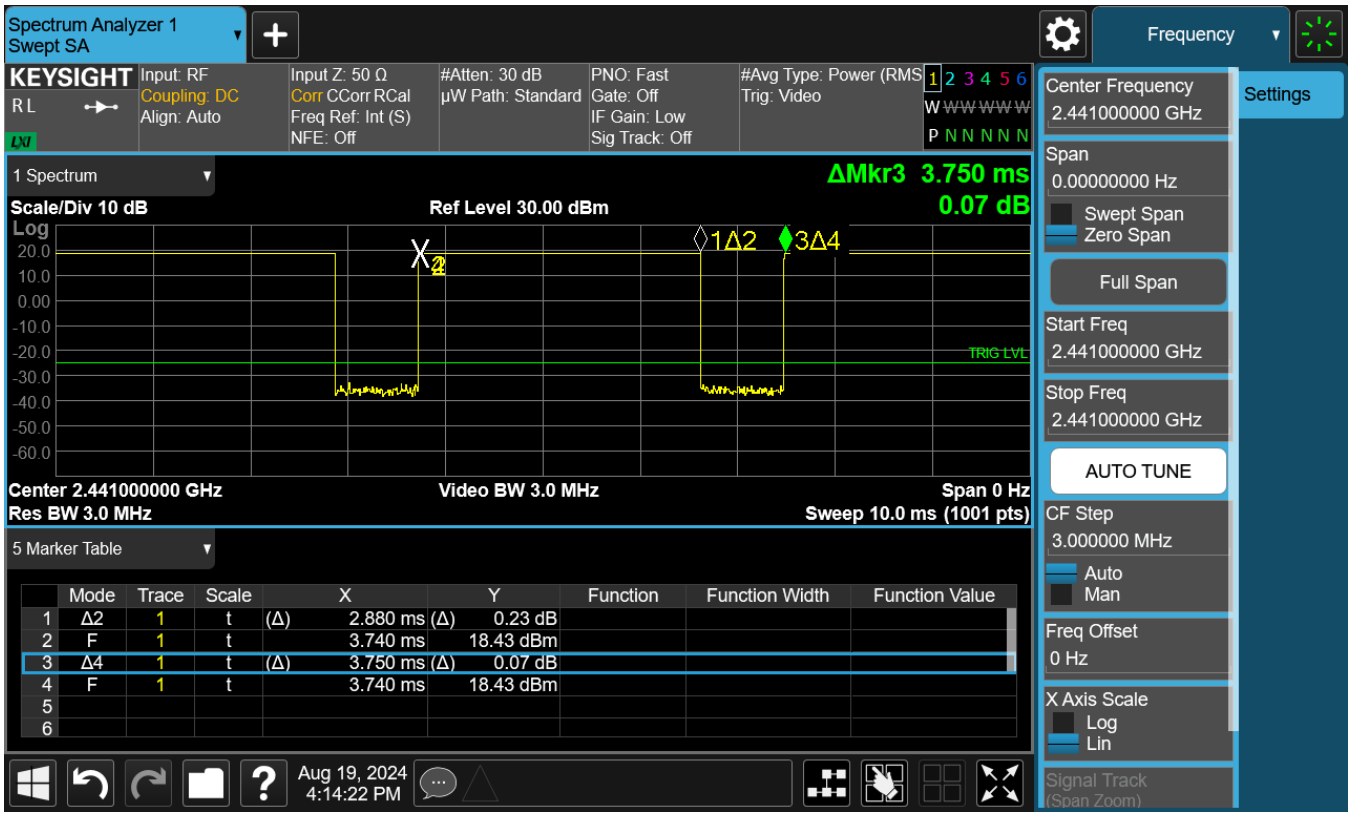

Figure 7-2
Bluetooth Transmission Plot – Antenna 1

Equation 7-1
Bluetooth Antenna 1 Duty Cycle Calculation

$$Duty\ Cycle = \frac{Pulse\ Width}{Period} * 100\% = \frac{2.88ms}{3.75ms} * 100\% = 76.8\%$$

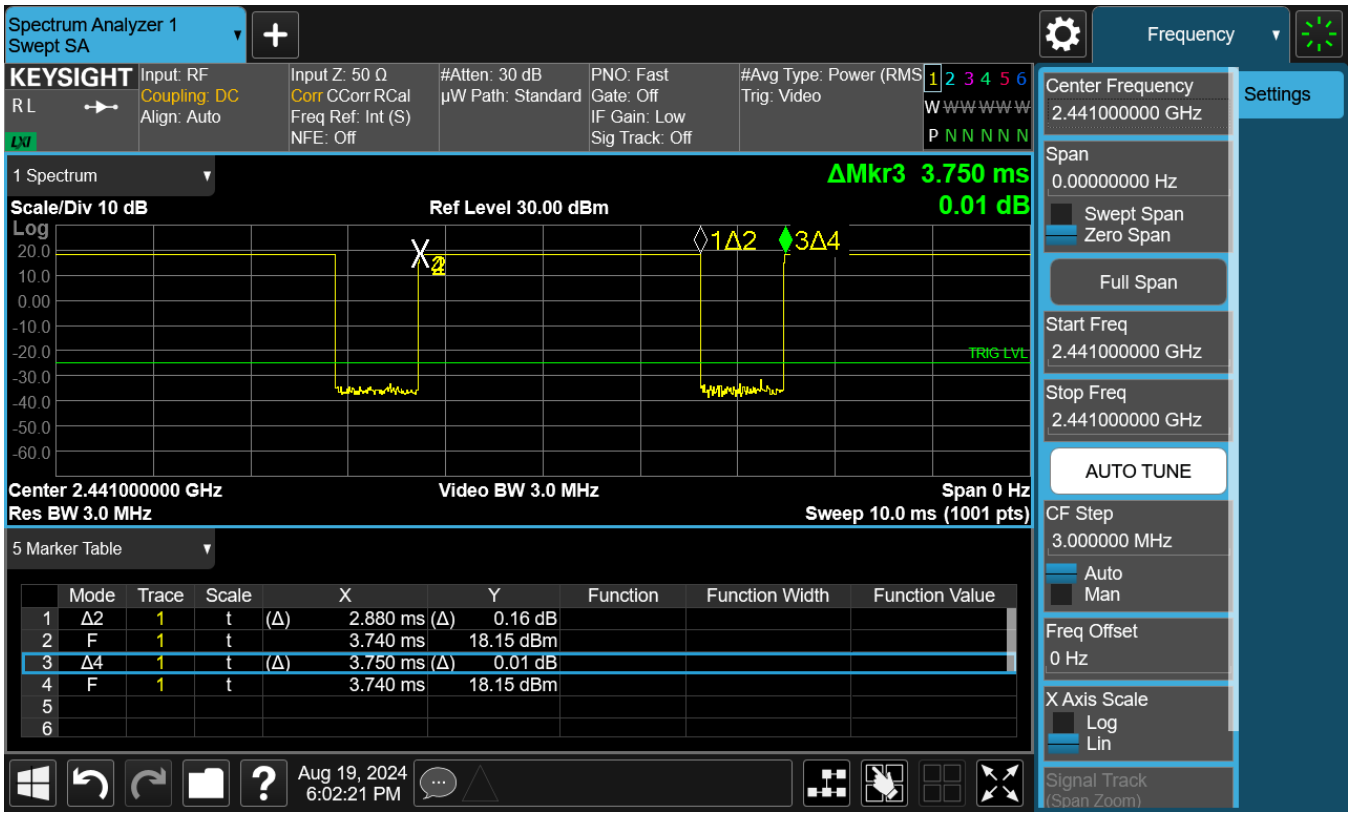

Figure 7-3
Bluetooth Transmission Plot – Antenna 2

Equation 7-2
Bluetooth Antenna 2 Duty Cycle Calculation

$$Duty\ Cycle = \frac{Pulse\ Width}{Period} * 100\% = \frac{2.88ms}{3.75ms} * 100\% = 76.8\%$$

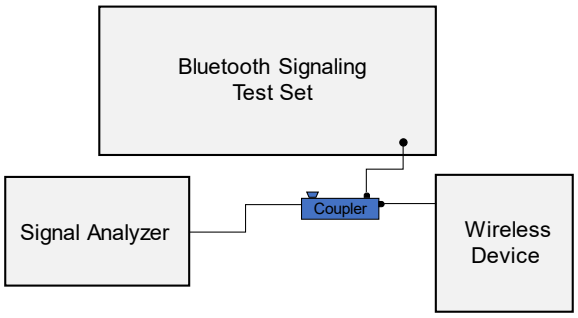

Figure 7-4
Power Measurement Setup

8 SYSTEM VERIFICATION

8.1 Tissue Verification

Table 8-1
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ε	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ε	% dev σ	% dev ε
08/08/2024	2450 Head	23.4	2300	1.700	40.228	1.670	39.500	1.80%	1.84%
			2310	1.707	40.214	1.679	39.480	1.67%	1.86%
			2320	1.715	40.201	1.687	39.460	1.66%	1.88%
			2400	1.772	40.107	1.756	39.289	0.91%	2.08%
			2450	1.810	40.035	1.800	39.200	0.56%	2.13%
			2480	1.832	40.002	1.833	39.162	-0.05%	2.14%
			2500	1.847	39.980	1.855	39.136	-0.43%	2.16%
			2510	1.855	39.968	1.866	39.123	-0.59%	2.16%
			2535	1.875	39.934	1.893	39.092	-0.95%	2.15%
			2550	1.887	39.918	1.909	39.073	-1.15%	2.16%
			2560	1.895	39.906	1.920	39.060	-1.30%	2.17%
			2600	1.927	39.852	1.964	39.009	-1.88%	2.16%
			2650	1.968	39.775	2.018	38.945	-2.48%	2.13%
			2680	1.992	39.726	2.051	38.907	-2.88%	2.11%
			2700	2.008	39.689	2.073	38.882	-3.14%	2.08%
08/19/2024	2450 Head	20.4	2300	1.685	38.397	1.670	39.500	0.90%	-2.79%
			2310	1.692	38.370	1.679	39.480	0.77%	-2.81%
			2320	1.700	38.349	1.687	39.460	0.77%	-2.82%
			2400	1.759	38.270	1.756	39.289	0.17%	-2.59%
			2450	1.800	38.158	1.800	39.200	0.00%	-2.66%
			2480	1.824	38.140	1.833	39.162	-0.49%	-2.61%
			2500	1.838	38.113	1.855	39.136	-0.92%	-2.61%
			2510	1.845	38.089	1.866	39.123	-1.13%	-2.64%
			2535	1.862	38.011	1.893	39.092	-1.64%	-2.77%
			2550	1.875	37.972	1.909	39.073	-1.78%	-2.82%
			2560	1.885	37.953	1.920	39.060	-1.82%	-2.83%
			2600	1.919	37.922	1.964	39.009	-2.29%	-2.79%
			2650	1.953	37.782	2.018	38.945	-3.22%	-2.99%
			2680	1.980	37.726	2.051	38.907	-3.46%	-3.04%
			2700	1.997	37.714	2.073	38.882	-3.67%	-3.00%
08/04/2024	5200-5800 Head	23.1	5180	4.531	35.451	4.635	36.009	-2.24%	-1.55%
			5190	4.541	35.435	4.645	35.998	-2.24%	-1.56%
			5200	4.549	35.408	4.655	35.986	-2.28%	-1.61%
			5210	4.561	35.388	4.666	35.975	-2.28%	-1.63%
			5220	4.572	35.372	4.676	35.963	-2.22%	-1.64%
			5240	4.597	35.325	4.696	35.940	-2.11%	-1.71%
			5250	4.606	35.308	4.706	35.929	-2.12%	-1.73%
			5260	4.616	35.293	4.717	35.917	-2.14%	-1.74%
			5270	4.631	35.272	4.727	35.906	-2.03%	-1.77%
			5280	4.643	35.251	4.737	35.894	-1.98%	-1.79%
			5290	4.653	35.230	4.748	35.883	-2.00%	-1.82%
			5300	4.662	35.215	4.758	35.871	-2.02%	-1.83%
			5310	4.671	35.199	4.768	35.860	-2.03%	-1.84%
			5320	4.684	35.180	4.778	35.849	-1.97%	-1.87%
			5500	4.876	34.853	4.963	35.643	-1.75%	-2.22%
			5510	4.888	34.835	4.973	35.632	-1.71%	-2.24%
			5520	4.899	34.810	4.983	35.620	-1.69%	-2.27%
			5530	4.911	34.789	4.994	35.609	-1.66%	-2.30%
			5540	4.921	34.760	5.004	35.597	-1.66%	-2.35%
			5550	4.935	34.744	5.014	35.586	-1.58%	-2.37%
			5560	4.945	34.730	5.024	35.574	-1.57%	-2.37%
			5580	4.968	34.702	5.045	35.551	-1.53%	-2.39%
			5600	4.993	34.654	5.065	35.529	-1.42%	-2.46%
			5610	5.004	34.634	5.076	35.518	-1.42%	-2.49%
			5620	5.013	34.627	5.086	35.506	-1.44%	-2.48%
			5640	5.033	34.585	5.106	35.483	-1.43%	-2.53%
			5660	5.058	34.538	5.127	35.460	-1.35%	-2.60%
			5670	5.071	34.523	5.137	35.449	-1.28%	-2.61%
			5680	5.082	34.507	5.147	35.437	-1.26%	-2.62%
			5690	5.094	34.494	5.158	35.426	-1.24%	-2.63%
			5700	5.108	34.479	5.168	35.414	-1.16%	-2.64%
			5710	5.118	34.463	5.178	35.403	-1.16%	-2.66%
			5720	5.129	34.441	5.188	35.391	-1.14%	-2.68%
			5745	5.156	34.379	5.214	35.363	-1.11%	-2.78%
			5750	5.161	34.373	5.219	35.357	-1.11%	-2.78%
			5755	5.167	34.365	5.224	35.351	-1.09%	-2.79%
			5765	5.180	34.343	5.234	35.340	-1.03%	-2.82%
			5775	5.191	34.325	5.245	35.329	-1.03%	-2.84%
			5785	5.203	34.306	5.255	35.317	-0.99%	-2.86%
			5795	5.214	34.296	5.265	35.305	-0.97%	-2.86%
			5805	5.223	34.289	5.275	35.294	-0.99%	-2.85%
			5825	5.244	34.252	5.296	35.271	-0.98%	-2.89%
			5835	5.253	34.230	5.305	35.230	-0.98%	-2.84%
			5845	5.262	34.202	5.315	35.210	-1.00%	-2.86%
			5850	5.268	34.189	5.320	35.200	-0.98%	-2.87%
			5855	5.274	34.181	5.325	35.197	-0.96%	-2.89%
			5875	5.300	34.172	5.347	35.183	-0.88%	-2.87%
			5885	5.309	34.155	5.357	35.177	-0.90%	-2.91%
			5905	5.332	34.105	5.379	35.163	-0.87%	-3.01%
08/05/2024	6000 Head	21.7	5935	5.432	34.493	5.411	35.143	0.39%	-1.85%
			5970	5.459	34.443	5.448	35.120	0.20%	-1.93%
			5985	5.470	34.405	5.464	35.110	0.11%	-2.01%
			6000	5.487	34.306	5.480	35.100	0.13%	-2.26%
			6025	5.561	34.319	5.510	35.070	0.93%	-2.14%
			6065	5.585	34.269	5.557	35.022	0.50%	-2.15%
			6075	5.580	34.222	5.569	35.010	0.20%	-2.25%
			6085	5.594	34.181	5.580	34.998	0.25%	-2.33%
			6185	5.731	34.054	5.698	34.878	0.58%	-2.36%
			6275	5.868	33.848	5.805	34.770	1.09%	-2.65%
			6285	5.864	33.860	5.816	34.758	0.83%	-2.58%
			6305	5.881	33.822	5.840	34.734	0.70%	-2.63%
			6345	5.952	33.729	5.887	34.686	1.10%	-2.76%
			6475	6.117	33.523	6.041	34.530	1.26%	-2.92%
			6485	6.141	33.527	6.052	34.518	1.47%	-2.87%
			6500	6.131	33.480	6.070	34.500	1.00%	-2.96%
			6505	6.122	33.471	6.076	34.494	0.76%	-2.97%
			6545	6.174	33.297	6.122	34.446	0.85%	-3.34%
			6665	6.300	33.128	6.265	34.302	0.56%	-3.42%
			6675	6.327	33.078	6.273	34.290	0.86%	-3.53%
			6685	6.349	33.051	6.285	34.278	1.02%	-3.58%
			6715	6.384	33.135	6.319	34.242	1.03%	-3.23%
			6785	6.444	32.867	6.400	34.158	0.69%	-3.78%
			6825	6.513	32.878	6.447	34.110	1.02%	-3.61%
			6985	6.650	32.665	6.633	33.918	0.26%	-3.69%
			6995	6.645	32.601	6.644	33.906	0.02%	-3.85%
			7000	6.647	32.559	6.650	33.900	-0.05%	-3.96%
			7005	6.651	32.521	6.656	33.894	-0.08%	-4.05%
			7025	6.713	32.407	6.680	33.870	0.49%	-4.32%

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2. The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

8.2 Test System Verification

Prior to SAR assessment, the system is verified to ±10% of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in the SAR System Validation Appendix.

Table 8-2
System Verification Results

SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	DAE	Measured SAR 1g (W/kg)	1W Target SAR 1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation 1g (%)	Measured SAR 10g (W/kg)	1W Target SAR 10g (W/kg)	1W Normalized SAR 10g (W/kg)	Deviation 10g (%)	Measured 4cm² APD (W/m²)	1W Target 4cm² APD (W/m²)	1W Normalized 4cm² APD	Deviation 4cm² APD (%)
K6	2450	HEAD	08/08/2024	23.2	23.4	0.10	882	7402	1502	5.16	53.00	51.60	-2.64%	2.41	24.90	24.10	-3.21%	N/A	N/A	N/A	N/A
O	2450	HEAD	08/19/2024	21.9	20.4	0.10	981	3914	728	5.41	53.90	54.10	0.37%	2.53	25.40	25.30	-0.39%	N/A	N/A	N/A	N/A
G	5250	HEAD	08/04/2024	23.2	23.2	0.05	1191	7713	1530	3.90	78.90	78.00	-1.14%	1.12	22.70	22.40	-1.32%	N/A	N/A	N/A	N/A
G	5600	HEAD	08/04/2024	23.2	23.2	0.05	1191	7713	1530	4.08	83.00	81.60	-1.69%	1.15	23.90	23.00	-3.77%	N/A	N/A	N/A	N/A
G	5750	HEAD	08/04/2024	23.2	23.2	0.05	1191	7713	1530	4.11	78.90	82.20	4.18%	1.17	22.40	23.40	4.46%	N/A	N/A	N/A	N/A
G	5850	HEAD	08/04/2024	23.2	23.2	0.05	1191	7713	1530	3.92	78.80	78.40	-0.51%	1.09	22.50	21.80	-3.11%	N/A	N/A	N/A	N/A
C	6500	HEAD	08/05/2024	23.0	21.7	0.03	1111	7659	1407	7.30	291.00	292.00	0.34%	1.36	53.50	54.40	1.68%	33.00	1300.00	1320.00	1.54%

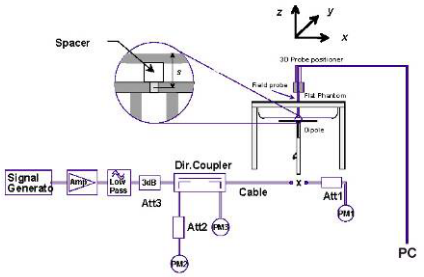

Figure 8-1
System Verification Setup Diagram

Figure 8-2
System Verification Setup Photo

8.3 Power Density Test System Verification

The system was verified to be within ±0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

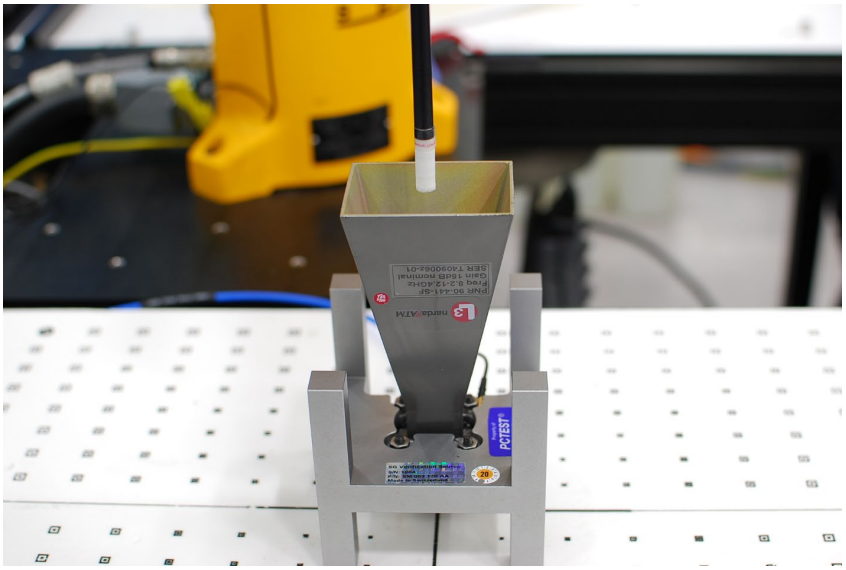

Figure 8-3
System Verification Setup Photo

Table 8-3
10 GHz Verifications

System Verification											
System	Frequency (GHz)	Date	Source S/N	Probe S/N	Prad (mW)	Normal psPD (W/m² over 4 cm²)		Deviation (dB)	Total psPD (W/m² over 4 cm²)		Deviation (dB)
						Measured	Target		Measured	Target	
Q	10	08/05/2024	1002	9622	93.3	49.70	54.60	-0.41	49.90	54.90	-0.41

Note: A **10 mm distance spacing** was used from the reference horn antenna aperture to the probe element.

9 SAR DATA SUMMARY

9.1 2.4 GHz WLAN SISO Standalone SAR

Table 9-1
2.4 GHz WLAN Antenna 2 Body

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz WIFI/ IEEE 802.11b	20	DSSS	2	0721L	99.85	-0.17	2437.00	6	1	15.5	14.88	Bottom	0	0.120	1.153	1.002	0.139	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population													Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-2
2.4 GHz WLAN MIMO Body

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Max Allowed Power (2nd ant) [dBm]	Conducted Power (2nd ant) [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz WIFI/ IEEE 802.11b	20	DSSS	MIMO	0677B	99.84	-0.02	2462.00	11	1	15.5	14.63	15.5	15.31	Bottom	0	0.391	1.222	1.002	0.479	A1
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population															Body 1.6 W/kg (mW/g) averaged over 1 gram						

Note: To achieve the 18.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 15.5 dBm.

9.2 5 GHz WLAN Standalone SAR

Table 9-3
5 GHz WLAN MIMO Body Max Power

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	U-NII band	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Max Allowed Power (2nd ant) [dBm]	Conducted Power (2nd ant) [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	-0.03	5290.00	58	U-NII-2A	58.5	12.0	11.99	12.0	11.50	Bottom	0	0.657	1.122	1.004	0.740	A2
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	0.01	5610.00	122	U-NII-2C	58.5	12.0	11.78	12.0	11.39	Bottom	0	0.546	1.151	1.004	0.631	
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	-0.08	5775.00	155	U-NII-3	58.5	12.0	11.79	12.0	11.07	Bottom	0	0.433	1.239	1.004	0.539	
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	-0.05	5855.00	171	U-NII-4	58.5	12.0	11.68	12.0	11.02	Bottom	0	0.426	1.253	1.004	0.536	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																Body 1.6 W/kg (mW/g) averaged over 1 gram						

Note: To achieve the 15 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 12 dBm.

Table 9-4
5 GHz WLAN MIMO Body with 2.4 GHz WLAN Active

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	U-NII band	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Max Allowed Power (2nd ant) [dBm]	Conducted Power (2nd ant) [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	-0.07	5290.00	58	U-NII-2A	58.5	9.0	8.22	9.0	7.58	Bottom	0	0.414	1.387	1.004	0.577	
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	-0.02	5610.00	122	U-NII-2C	58.5	9.0	8.81	9.0	7.91	Bottom	0	0.370	1.285	1.004	0.477	
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	0.01	5775.00	155	U-NII-3	58.5	9.0	8.89	9.0	7.52	Bottom	0	0.365	1.406	1.004	0.515	
Body	5 GHz WIFI/ IEEE 802.11ac	80	OFDM	MIMO	0677B	99.63	0.02	5855.00	171	U-NII-4	58.5	9.0	8.78	9.0	7.28	Bottom	0	0.356	1.486	1.004	0.531	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population																Body 1.6 W/kg (mW/g) averaged over 1 gram						

Note: To achieve the 12 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 9 dBm.

9.3 6 GHz Standalone SAR and APD

Table 9-5
6 GHz WLAN MIMO Body Max Power

Exposure	Band / Mode	Bandwidth [MHz]	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Max Allowed Power (2nd ant) [dBm]	Conducted Power (2nd ant) [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	0.14	5985.00	7	68.1	9.0	8.63	9.0	7.99	Bottom	0	0.230	1.262	1.003	0.291	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.02	6305.00	71	68.1	9.0	8.57	9.0	8.66	Bottom	0	0.198	1.104	1.003	0.219	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.06	6465.00	103	68.1	9.0	8.49	9.0	8.82	Bottom	0	0.201	1.125	1.003	0.227	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	0.06	6705.00	151	68.1	9.0	8.69	9.0	8.35	Bottom	0	0.358	1.161	1.003	0.417	A3
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.12	7025.00	215	68.1	9.0	8.54	9.0	7.97	Bottom	0	0.209	1.268	1.003	0.266	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population															Body 1.6 W/kg (mW/g) averaged over 1 gram						

Note: To achieve the 12 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 9 dBm.

Exposure	Band/ Mode	Bandwidth [MHz]	Service/ Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Max Allowed Power (2nd ant) [dBm]	Conducted Power (2nd ant) [dBm]	Test Position	Spacing [mm]	Measured APD [W/m² (4cm²)]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported APD [W/m² (4cm²)]	Plot #
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	0.14	5985.00	7	68.1	9.0	8.63	9.0	7.99	Bottom	0	1.410	1.262	1.003	1.785	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.02	6305.00	71	68.1	9.0	8.57	9.0	8.66	Bottom	0	1.220	1.104	1.003	1.351	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.06	6465.00	103	68.1	9.0	8.49	9.0	8.82	Bottom	0	1.190	1.125	1.003	1.343	
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	0.06	6705.00	151	68.1	9.0	8.69	9.0	8.35	Bottom	0	1.970	1.161	1.003	2.294	A3
Body	6 GHz WIFI/ IEEE 802.11ax	80	OFDM	MIMO	0671Z	99.67	-0.12	7025.00	215	68.1	9.0	8.54	9.0	7.97	Bottom	0	1.280	1.268	1.003	1.628	

9.4 Bluetooth SISO Standalone SAR

Table 9-6
Bluetooth Antenna 1 Body

Exposure	Band / Mode	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz Bluetooth	FHSS	1	0720R	76.80	0.02	2441.00	39	1	17.5	17.30	Bottom	0	0.741	1.047	1.016	0.788	A4
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-7
Bluetooth Antenna 2 Body

Exposure	Band / Mode	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz Bluetooth	FHSS	2	0720R	76.80	0.02	2441.00	39	1	17.5	16.85	Bottom	0	0.494	1.161	1.016	0.583	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-8
Bluetooth Antenna 1 in Dual Mode Body

Exposure	Band / Mode	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz Bluetooth	FHSS	1	0720R	76.80	0.11	2441.00	39	1	14.0	13.71	Bottom	0	0.334	1.069	1.016	0.363	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram						

Table 9-9
Bluetooth Antenna 2 in Dual Mode Body

Exposure	Band / Mode	Service / Modulation	Ant.	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #	Data Rate [Mbps]	Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot #
Body	2.4 GHz Bluetooth	FHSS	2	0720R	76.80	-0.04	2402.00	39	1	14.0	12.55	Bottom	0	0.165	1.396	1.016	0.234	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population												Body 1.6 W/kg (mW/g) averaged over 1 gram						

9.5 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, FCC KDB Publication 447498 D01v06, and FCC KDB Publication 616217 D04v01r02.
2. Batteries are fully charged at the beginning of the SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
6. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg. Please see Section 11 for variability analysis.
7. FCC KDB Publication 616217 D04v01r02 Section 4.2, When antennas are incorporated in the keyboard section of a laptop computer, SAR is required for the bottom surface of the keyboard. Provided tablet use conditions are not supported by the laptop computer, SAR tests for bystander exposure from the edges of the keyboard and display screen of laptop computers are generally not required. The SAR Exclusion Threshold in FCC KDB 447498 D01v06 was applied to determine SAR test exclusion for adjacent edge configurations.
8. The orange highlights throughout the report represent the highest scaled SAR per Equipment Class.

WLAN Notes:

1. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 2.4 GHz WIFI 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/ax/be) was not required due to the maximum allowed powers and the highest reported DSSS SAR. See Section 6.2.4 for more information.
2. Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02 for 5 GHz WIFI operations, the initial test configuration was selected according to the transmission mode with the highest maximum allowed powers. Other transmission modes were not investigated since the highest reported SAR for initial test configuration adjusted by the ratio of maximum output powers is less than 1.2 W/kg for 1g evaluations. See Section 6.2.5 for more information.
3. Per KDB Publication 248227 D01v02r02, SAR for MIMO was evaluated by following the simultaneous SAR provisions from KDB Publication 447498 D01v06 by either evaluating the sum of the 1g SAR values of each antenna transmitting independently or making a SAR measurement with both antennas transmitting simultaneously. Please see the Multi-Tx and Antenna SAR Considerations Appendix for complete analysis.
4. When the maximum reported 1g averaged SAR is ≤0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was ≤ 1.20 W/kg for 1g evaluations or all test channels were measured.
5. The device was 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. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated EMC test reports.
6. Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. Per October 2020 TCB Workshop notes, 5 channels were tested.

Bluetooth Notes

1. Bluetooth SAR was measured with the device connected to a call box with hopping disabled with DH5 operation and Tx Tests test mode type. Per October 2016 TCB Workshop Notes, the reported SAR was scaled to the 78% transmission duty factor for Bluetooth Antenna 1 and 78% transmission duty factor for Bluetooth Antenna 2 to determine compliance. See RF Conducted Power Section for the time domain plot and calculation for the duty factor of the device.

10 POWER DENSITY DATA SUMMARY

10.1 6 GHz WIFI Power Density Results

Table 10-1
6 GHz WLAN Laptop

MEASUREMENT RESULTS																								
Frequency (MHz)	Channel	Mode	Service	Bandwidth (MHz)	Maximum Allowed Power (Ant 1) (dBm)	Conducted Power (Ant 1) (dBm)	Maximum Allowed Power (Ant 2) (dBm)	Conducted Power (Ant 2) (dBm)	Power Drift (dB)	Spacing (mm)	Antenna Config.	DUT Serial Number	Data Rate (Mbps)	Side	Duty Cycle (%)	Grid Step (λ)	iPD (W/m²)	Scaling Factor for Measurement Uncertainty per IEC 62479	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Normal psPD (W/m²)	Scaled Normal psPD (W/m²)	Total psPD (W/m²)	Scaled Total psPD (W/m²)	Plot #
5985.00	7	802.11ax	OFDM	80	9.00	8.63	9.00	7.99	-0.11	2	MIMO	0721L	MSC0	Bottom	99.67	0.125	1.410	1.554	1.262	1.003	1.320	2.596	1.490	2.931	
5985.00	7	802.11ax	OFDM	80	9.00	8.63	9.00	7.99	0.17	10.02	MIMO	0721L	MSC0	Bottom	99.67	0.125	1.150	1.554	1.262	1.003	0.553	1.088	0.611	1.202	
6305.00	71	802.11ax	OFDM	80	9.00	8.57	9.00	8.66	0.12	2	MIMO	0721L	MSC0	Bottom	99.67	0.125	-	1.554	1.104	1.003	1.080	1.858	1.380	2.375	
6465.00	103	802.11ax	OFDM	80	9.00	8.49	9.00	8.82	-0.12	2	MIMO	0721L	MSC0	Bottom	99.67	0.125	-	1.554	1.125	1.003	1.660	2.911	1.930	3.384	
6705.00	151	802.11ax	OFDM	80	9.00	8.69	9.00	8.35	0.10	2	MIMO	0721L	MSC0	Bottom	99.67	0.125	-	1.554	1.161	1.003	2.440	4.415	2.880	5.212	A5
7025.00	215	802.11ax	OFDM	80	9.00	8.54	9.00	7.97	0.10	2	MIMO	0721L	MSC0	Bottom	99.67	0.125	-	1.554	1.268	1.003	1.730	3.419	2.060	4.071	
47 CFR §1.1310 - SAFETY LIMIT Spatial Average Uncontrolled Exposure / General Population															Power Density 10 W/m² averaged over 4 cm²									

Power Density General Notes

1. The manufacturer has confirmed that the devices tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
2. Batteries are fully charged at the beginning of the measurements. The DUT was connected to a wall charger for some measurements due to the test duration. It was confirmed that the charger plugged into this DUT did not impact the near-field PD test results.
3. Power density was calculated by repeated E-field measurements on two measurement planes separated by λ/4.
4. The device was 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.
5. Per FCC guidance and equipment manufacturer guidance, power density results were scaled according to IEC 62479:2010 for the portion of the measurement uncertainty > 30%. Total expanded uncertainty of 2.68 dB (85.4%) was used to determine the psPD measurement scaling factor.
6. Per equipment manufacturer guidance, power density was measured at d=2mm and d=λ/5mm using the same grid size and grid step size for some frequencies and surfaces. The integrated Power Density (iPD) was calculated based on these measurements. Since iPD ratio between the two distances is ≥ -1dB, the grid step was sufficient for determining compliance at d=2mm.
7. PTP-PR algorithm was used during psPD measurement and calculations.
8. PD results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04.
9. Per October 2020 TCB Workshop notes, 5 channels were tested.

11 SAR MEASUREMENT VARIABILITY

11.1 Measurement Variability

FCC KDB Publication 865664 D01v01, SAR measurement variability was not assessed for each frequency band since all measured SAR values are < 0.80 W/kg for 1g SAR.

11.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 was not required.

12 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	E4404B	Spectrum Analyzer	N/A	N/A	N/A	MY45113242
Agilent	E4438C	ESG Vector Signal Generator	11/14/2023	Annual	11/14/2024	MY45093852
Agilent	E4438C	ESG Vector Signal Generator	11/15/2023	Annual	11/15/2024	MY45092078
Agilent	N5182A	MXG Vector Signal Generator	10/12/2023	Annual	10/12/2024	MY47400015
Agilent	N5182A	MXG Vector Signal Generator	3/7/2024	Annual	3/7/2025	MY47420603
Agilent	8753ES	S-Parameter Vector Network Analyzer	3/6/2024	Annual	3/6/2025	MY40000670
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/10/2024	Annual	1/10/2025	MY40001472
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	343972
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433971
Amplifier Research	150A100C	Amplifier	CBT	N/A	CBT	350132
Anritsu	MA24408A	Power Sensor	4/10/2024	Annual	4/10/2025	12798
Anritsu	MA2411B	Pulse Power Sensor	8/22/2023	Annual	8/22/2024	1726262
Anritsu	MA2411B	Pulse Power Sensor	11/8/2023	Annual	11/8/2024	1027293
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Anritsu	MA24106A	USB Power Sensor	4/15/2024	Annual	4/15/2025	1827528
Mini-Circuits	PWR-4GHS	USB Power Sensor	6/12/2024	Annual	6/12/2025	12001070013
Control Company	4040	Therm./ Clock/ Humidity Monitor	1/15/2024	Annual	1/15/2025	160574418
Mitutoyo	500-196-30	CD-6"ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N9020A	MXA Signal Analyzer	10/17/2023	Annual	10/17/2024	MY51240479
Keysight Technologies	N9020A	MXA Signal Analyzer	4/11/2024	Annual	4/11/2025	MY54500644
Agilent	N9020A	MXA Signal Analyzer	6/14/2024	Annual	6/14/2025	MY56470202
Mini-Circuits	VLF-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	VLF-6000+	Low Pass Filter DC to 6000 MHz	CBT	N/A	CBT	31634
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Seekonk	NC-100	Torque Wrench	CBT	N/A	CBT	22217
Seekonk	NC-100	Torque Wrench	4/2/2024	Biennial	4/2/2026	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/13/2023	Annual	11/13/2024	1277
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	7/8/2024	Annual	7/8/2025	1039
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1379
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1243
SPEAG	5G Verification Source 10GHz	10GHz System Verification Antenna	3/5/2024	Annual	3/5/2025	1002
SPEAG	D2450V2	2450 MHz SAR Dipole	2/8/2024	Annual	2/8/2025	882
SPEAG	D2450V2	2450 MHz SAR Dipole	11/25/2021	Triennial	11/25/2024	981
SPEAG	D5GHzV2	5 GHz SAR Dipole	1/17/2024	Annual	1/17/2025	1191
SPEAG	D6.5GHzV2	6.5 GHz SAR Dipole	2/22/2024	Annual	2/22/2025	1111
SPEAG	DAE4	Dasy Data Acquisition Electronics	5/8/2024	Annual	5/8/2025	1502
SPEAG	DAE4	Dasy Data Acquisition Electronics	5/8/2024	Annual	5/8/2025	728
SPEAG	DAE4	Dasy Data Acquisition Electronics	1/16/2024	Annual	1/16/2025	1530
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/18/2024	Annual	4/18/2025	1407
SPEAG	DAE4ip	Dasy Data Acquisition Electronics	11/15/2023	Annual	11/15/2024	1639
SPEAG	EX3DV4	SAR Probe	5/10/2024	Annual	5/10/2025	7402
SPEAG	EX3DV4	SAR Probe	5/10/2024	Annual	5/10/2025	3914
SPEAG	EX3DV4	SAR Probe	1/17/2024	Annual	1/17/2025	7713
SPEAG	EX3DV4	SAR Probe	4/17/2024	Annual	4/17/2025	7659
SPEAG	EUmmWV4	EUmmWV4 Probe	2/2/2024	Annual	2/2/2025	9622

Note: 1) All equipment was used solely within its respective calibration period. 2) CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

13 MEASUREMENT UNCERTAINTIES

Applicable for SAR Measurements < 6 GHz:

Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	f(d,k) Div.	c_i 1gm	c_i 10 gms	c x f/e 1gm u_i (± %)	c x g/e 10gms u_i (± %)	v_i
Measurement System									
Probe Calibration	E.2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.73	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.73	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.73	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.73	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.73	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.73	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.73	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.73	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.73	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Unceritainty	E.3.4	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)			RSS				12.2	12.0	191
Expanded Uncertainty (95% CONFIDENCE LEVEL)			k=2				24.4	24.0	

The above measurement uncertainties are according to IEEE Std. 1528-2013

Applicable for SAR Measurements > 6 GHz:

Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	f(d,k) Div.	c_i 1gm	c_i 10 gms	c x f/e 1gm u_i (± %)	c x g/e 10gms u_i (± %)	v_i
Measurement System									
Probe Calibration	E.2.1	9.3	N	1	1	1	9.3	9.3	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.73	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.73	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.73	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.73	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.73	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.73	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.73	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.73	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.73	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Unceritainty	E.3.4	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)			RSS				13.8	13.6	191
Expanded Uncertainty (95% CONFIDENCE LEVEL)			k=2				27.6	27.1	

The above measurement uncertainties are according to IEEE Std. 1528-2013

Applicable for Power Density Measurements:

a	b	c	d	e	f = c x f/e	g
Uncertainty Component	Unc. (± dB)	Prob. Dist.	Div.	c_i	u_i (± dB)	v_i
Measurement System						
Calibration	0.49	N	1	1	0.49	∞
Probe Correction	0.00	R	1.73	1	0.00	∞
Frequency Response	0.20	R	1.73	1	0.12	∞
Sensor Cross Coupling	0.00	R	1.73	1	0.00	∞
Isotropy	0.50	R	1.73	1	0.29	∞
Linearity	0.20	R	1.73	1	0.12	∞
Probe Scattering	0.00	R	1.73	1	0.00	∞
Probe Positioning offset	0.30	R	1.73	1	0.17	∞
Probe Positioning Repeatability	0.04	R	1.73	1	0.02	∞
Sensor MechanicalOffset	0.00	R	1.73	1	0.00	∞
Probe Spatial Resolution	0.00	R	1.73	1	0.00	∞
Field Impedence Dependance	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Drift	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Noise	0.04	R	1.73	1	0.02	∞
Measurement Area Truncation	0.00	R	1.73	1	0.00	∞
Data Acquisition	0.03	N	1	1	0.03	∞
Sampling	0.00	R	1.73	1	0.00	∞
Field Reconstruction	2.00	R	1.73	1	1.15	∞
Forward Transformation	0.00	R	1.73	1	0.00	∞
Power Density Scaling	0.00	R	1.73	1	0.00	∞
Spatial Averaging	0.10	R	1.73	1	0.06	∞
System Detection Limit	0.04	R	1.73	1	0.02	∞
Test Sample Related						
Probe Coupling with DUT	0.00	R	1.73	1	0.00	∞
Modulation Response	0.40	R	1.73	1	0.23	∞
Integration Time	0.00	R	1.73	1	0.00	∞
Response Time	0.00	R	1.73	1	0.00	∞
Device Holder Influence	0.10	R	1.73	1	0.06	∞
DUT alignment	0.00	R	1.73	1	0.00	∞
RF Ambient Conditions	0.04	R	1.73	1	0.02	∞
Ambient Reflections	0.04	R	1.73	1	0.02	∞
Immunity/Secondary Reception	0.00	R	1.73	1	0.00	∞
Drift of DUT	0.21	R	1.73	1	0.12	∞
Combined Standard Uncertainty (k=1)		RSS			1.34	∞
Expanded Uncertainty (95% CONFIDENCE LEVEL)		k=2				

14 CONCLUSION

14.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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