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6 GHZ RF EXPOSURE EVALUATION

Applicant Name SAMSUNG ELECTRONICS CO., LTD. #129 Samsung-Ro, Yeongtong-Gu Suwon-Si, Gyeonggi-Do 16677, Korea (Republic Of) Date of Testing 05/30/2023 Test Site/Location Element, Columbia, MD, USA Document Serial No: 1M2305260069-03.A3L

FCC ID: A3LSMF731U

APPLICANT: SAMSUNG ELECTRONICS CO., LTD.

DUT Type: Portable Handset

Application Type: Class II Permissive Change

FCC Rule Part(s):CFR §2.1093Model:SM-F731UAdditional Model(s):SM-F731U1

| | Tx Frequency | SAR | APD | |
|-------------|------------------------------|------|-------------|--|
| Band & Mode | MHz 1g Head (W/kg) Head (W/m | | Head (W/m²) | |
| WIFI 6 GHz | 5935 - 7115 | 0.11 | 0.72 | |

Values above represent RF exposure evaluations during MIMO operations.

Only operations relevant to this permissive change were evaluated for compliance. Please see the original compliance evaluation in RF Exposure Technical Report S/N 1M2303100026-26.A3L for complete evaluation of all other operating modes. The operational description includes a description of all changed items.

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 | Tx Frequency |
|-------------|-----------------|
| U-NII-5 | 5935 - 6415 MHz |
| U-NII-6 | 6435 - 6515 MHz |
| U-NII-7 | 6535 - 6875 MHz |
| U-NII-8 | 6895 - 7115 MHz |

1.2 Nominal and Maximum Output Power Specifications

The 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.

1.2.1 Reduced MIMO WLAN Output Power

| | | IEEE 802.1 | 1 (in dBm) | | | | |
|--------------------------|---------|------------|-------------------|---------|--|--|--|
| | MIMO | | | | | | |
| Mode | | | ax ((CDD + S) | * | | | |
| | Nominal | Maximum | Nominal | Maximum | | | |
| 6 GHz WIFI (20MHz | 12.0 | 13.0 | 12.0 | 13.0 | | | |
| 6 GHz WIFI (40MHz | | | 12.0 | 13.0 | | | |
| 6 GHz WIFI (80MHz | | | 12.0 | 13.0 | | | |
| 6 GHz WIFI (160MHz | | | 12.0 | 13.0 | | | |

Note: Target powers in the above table represent worst case targets across LPI and SP options.

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| IEEE 802.11ax RU (in dBm) | | | | | | | | |
|---------------------------|-----------|---------|---------|---------|----------|---------|-----------|---------|
| Mode | Mode MIMO | | | | | | | |
| Tones | 6G 20M | | 6G 4 | 0MHz | 6G 80MHz | | 6G 160MHz | |
| 101165 | Nominal | Maximum | Nominal | Maximum | Nominal | Maximum | Nominal | Maximum |
| 26T | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 |
| 52T | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 |
| 106T | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 |
| 242T | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 |
| 484T | | | 12.0 | 13.0 | 12.0 | 13.0 | 12.0 | 13.0 |
| 996T | | | | | 12.0 | 13.0 | 12.0 | 13.0 |
| 2x996T | | | | | | | 12.0 | 13.0 |

Note: Target powers in the above table represent worst case targets across LPI and SP options.

1.3 DUT Antenna Locations

A diagram showing the location of the device antennas for open configurations can be found in DUT Antenna Diagram and SAR Test Setup Photographs Appendix

Table 1-1
Device Surfaces for Configuration

| Device Sides/Edges for Testing | | | | | | | |
|--------------------------------|-------------|------|-------|-----|--------|-------|------|
| Mode | Form Factor | Back | Front | Тор | Bottom | Right | Left |
| 6 GHz WLAN MIMO | Open | Yes | Yes | Yes | No | Yes | Yes |
| 6 GHz WLAN MIMO | Closed | Yes | No | No | No | No | No |

Note: Particular DUT edges were not required to be evaluated for phablet SAR if the edges were greater than 2.5 cm from the transmitting antenna according to FCC KDB Publication 648474 D04v01r03. The distances between the transmit antennas and the edges of the device are included in the filing. Wireless router mode is disabled for all 6 GHz WLAN operations.

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1.4 Miscellaneous Testing Considerations

Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors for WIFI 6GHz. FCC KDB 648474, FCC KDB 941225 D07 and FCC KDB 248227 were followed for test positions, distances, and modes. Absorbed power density (APD) using a 4cm^2 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 \geq -1dB per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%. Per TCB workshop October 2020 notes, 5 channels were tested for WIFI 6 GHz.

6 GHz WIFI SAR results are used for simultaneous transmission analysis with the other transmitters. Analysis can be found in SAR report.

To make the most efficient use of the additional available subcarriers (data tones), IEEE 802.11ax can utilize Orthogonal Frequency-Division Multiple Access (OFDMA) which divides the existing 802.11 channels into smaller subchannels called Resource Units (RUs). Possible RU sizes are: 26T, 52T, 106T, 242T, 484T, 996T and 2x996T.

Per FCC Guidance, 802.11ax RU was considered a higher order 802.11 mode when compared to a/b/g/n/ac to apply KDB Publication 248227 D01v02r02 for OFDM mode selection. Therefore, SAR tests were not required for 802.11ax RU 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 size to demonstrate that the output powers would not be higher than the other OFDM 802.11 modes. Please see Measurement Report SN 1M2303100026-18.A3L for 802.11ax RU output powers.

1.5 Guidance Applied

- November 2017, October 2018, April 2019, November 2019, October 2020 TCBC Workshop Notes
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)
- IEEE 1528-2013
- IEC/IEEE 63195-1:2022
- IEC 62479:2010
- FCC KDB 865664 D02 v01r02
- FCC KDB 648474 D04 v01r03
- FCC KDB 248227 D01 v02r02
- FCC KDB 447498 D04 v01
- FCC KDB 865664 D01 v01r04
- April 2019 TCB Workshop Notes (IEEE 802.11ax)

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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. [15]

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 [44] and Health Canada RF Exposure Guidelines Safety Code 6 [35]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [17] 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/m³)

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.[20]

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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:

- 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.

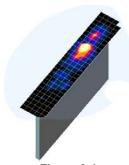


Figure 3-1 Sample SAR Area Scan

- 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*

| | | Maximum Zoom Scan | Maximum Zoom Scan Spatial Resolution (mm) | | | Minimum Zoom Scan |
|-----------|--|---|--|-------------------------|---------------------------------|------------------------|
| Frequency | Resolution (mm) (Δx _{area} , Δy _{area}) | Resolution (mm) (Δx _{zoom} , Δy _{zoom}) | Uniform Grid | Graded Grid | | Volume (mm) (x,y,z) |
| | t died- ydiedy | 7 200117 | Δz _{zoom} (n) | Δz _{zoom} (1)* | Δz _{zoom} (n>1)* | , , , , |
| ≤ 2 GHz | ≤ 15 | ≤8 | ≤5 | ≤4 | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 30 |
| 2-3 GHz | ≤ 12 | ≤5 | ≤5 | ≤4 | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 30 |
| 3-4 GHz | ≤ 12 | ≤5 | ≤ 4 | ≤3 | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 28 |
| 4-5 GHz | ≤ 10 | ≤4 | ≤3 | ≤2.5 | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 25 |
| 5-6 GHz | ≤ 10 | ≤4 | ≤2 | ≤2 | ≤ 1.5*∆z _{zoom} (n-1) | ≥ 22 |

^{*}Also compliant to IEEE 1528:2013 Table 6

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4 DEFINITION OF REFERENCE POINTS

4.1 EAR REFERENCE POINT

Figure 4-2 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 4-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front), also called the Reference Pivoting Line, is not perpendicular to the reference plane (see Figure 4-1). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [18].

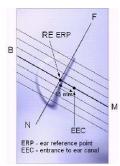


Figure 4-1 Close-Up Side view of ERP

4.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the acoustic output located along the "vertical centerline" on the front of the device aligned to the "ear reference point" (See Figure 4-3). The acoustic output was than located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at its top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.



Figure 4-2
Front, back and side view of SAM Twin Phantom

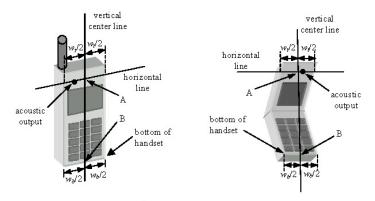


Figure 4-3
Handset Vertical Center & Horizontal Line Reference Points

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5 TEST CONFIGURATION POSITIONS

5.1 Device Holder

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

5.2 Positioning for Cheek

1. The test device was positioned with the device close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 5-1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.



Figure 5-1 Front, Side and Top View of Cheek Position

- 2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the pinna.
- 3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the reference plane.
- 4. The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical was respect to the line NF.
- 5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the device contact with the ear, the device was rotated about the NF line until any point on the handset made contact with a phantom point below the ear (cheek) (See Figure 5-2).

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5.3 Positioning for Ear / 15° Tilt

With the test device aligned in the "Cheek Position":

- 1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degrees.
- 2. The phone was then rotated around the horizontal line by 15 degrees.
- 3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the handset touched the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. In this situation, the tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 5-2).



Figure 5-2 Front, Side and Top View of Ear/15º Tilt Position

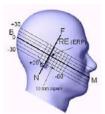


Figure 5-3
Side view w/ relevant markings

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6 RF EXPOSURE LIMITS

6.1 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.

6.2 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.

6.3 RF Exposure Limits for Frequencies Below 6 GHz

Table 6-1
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 | |

- 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.

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6.4 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/m² or mW/cm².

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Table 6-2
Human Exposure Limits Specified in FCC 47 CFR §1.1310

| Human Exposure to Radiofrequency (RF) Radiation Limits | | | | |
|---|------------------------------------|-------------|--|--|
| Frequency Range Power Density Average Time [MHz] [mW/cm²] [Minutes] | | | | |
| (A) Limi | ts For Occupational / Controlled E | nvironments | | |
| 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/cm² is 10 W/m²

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7 MEASUREMENT PROCEDURES

7.1 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.

7.2 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.

7.3 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.

7.4 Initial Test Position Procedure

For exposure conditions with multiple test positions, such as handset operating next to the ear, devices with hotspot mode or UMPC mini-tablet, procedures for initial test position can be applied. Using the transmission mode determined by the DSSS procedure or initial test configuration, area scans are measured for all positions in an exposure condition. The test position with the highest extrapolated (peak) SAR is used as the initial test position. When reported SAR for the initial test position is ≤ 0.4 W/kg, no additional testing for the remaining test positions is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7.5 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

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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.

7.6 Initial Test Configuration Procedure

For OFDM, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order IEEE 802.11 mode. The channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is \leq 0.8 W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is \leq 1.2 W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements (See Section 7.2.3). When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7.7 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.

7.8 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.

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8 RF CONDUCTED POWERS

Table 8-1
RCV Reduced 6 GHz WLAN Maximum Average RF Power – 802.11ax 80 MHz BW

| 6GHz (80MHz) 802.11ax Conducted Power [dBm] | | | | | |
|---|---------|------|------|-------|--|
| Freq [MHz] | Channel | ANT1 | ANT2 | MIMO | |
| 5985 | 7 | 9.54 | 9.41 | 12.49 | |
| 6305 | 71 | 9.33 | 9.44 | 12.40 | |
| 6545 | 119 | 9.81 | 9.76 | 12.80 | |
| 6785 | 167 | 9.32 | 9.58 | 12.46 | |
| 7025 | 215 | 9.41 | 9.50 | 12.47 | |

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 identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.

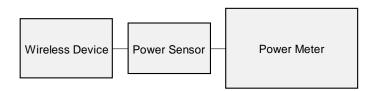


Figure 8-1
Power Measurement Setup

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9 SYSTEM VERIFICATION

9.1 SAR Test System Verification

Table 9-1 Measured 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 | | | | | | | | | | | | | | | | | | | | | |
|--|-------------|---|--------------------------------|--------------------------------------|---------------------------------------|------------------------------------|-------------------------------------|---------|---------|-----|--|---|------|-------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--|------|-------|--------|-------|--------|-------|
| | | | 6000 | 5.701 | 35.244 | 5.480 | 35.100 | 4.03% | 0.41% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6025 | 5.734 | 35.188 | 5.510 | 35.070 | 4.07% | 0.34% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6065 | 5.786 | 35.105 | 5.557 | 35.022 | 4.12% | 0.24% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6075 | 5.799 | 35.085 | 5.569 | 35.010 | 4.13% | 0.21% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6085 | 5.811 | 35.064 | 5.580 | 34.998 | 4.14% | 0.19% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6185 | 5.936 | 34.861 | 5.698 | 34.878 | 4.18% | -0.05% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6275 | 6.047 | 34.684 | 5.805 | 34.770 | 4.17% | -0.25% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6285 | 6.059 | 34.665 | 5.816 | 34.758 | 4.18% | -0.27% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6305 | 6.084 | 34.627 | 5.840 | 34.734 | 4.18% | -0.31% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6345 | 6.134 | 34.557 | 5.887 | 34.686 | 4.20% | -0.37% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6475 | 6.290 | 34.335 | 6.041 | 34.530 | 4.12% | -0.56% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6485 | 6.302 | 34.317 | 6.052 | 34.518 | 4.13% | -0.58% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6500 | 6.320 | 34.291 | 6.070 | 34.500 | 4.12% | -0.61% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6505 | 6.327 | 34.282 | 6.076 | 34.494 | 4.13% | -0.61% | | | | | | | | | | | | | | | | | | | | | |
| 5/30/2023 | 6500 Head | 21.2 | 6545 | 6.376 | 34.203 | 6.122 | 34.446 | 4.15% | -0.71% | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | - | 6665 | 6.526 | 33.958 | 6.265 | 34.302 | 4.17% | -1.00% | | | | | | | | | | | |
| | | | | | | | | | | | | | - | 6675 | 6.538 | 33.938 | 6.273 | 34.290 | 4.22% | -1.03% | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | 6685 | 6.551 | 33.918 | 6.285 | 34.278 | 4.23% | -1.05% | | | | | | | |
| | | | | | | | | | | | | | | | | 6715 | 6.589 | 33.861 | 6.319 | 34.242 | 4.27% | -1.11% | | | | | | | | |
| | | | 6785 | 6.674 | 33.740 | 6.400 | 34.158 | 4.28% | -1.22% | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | l E | | | | 6825 | 6.723 | 33.675 | 6.447 | 34.110 | 4.28% | -1.28% | | | | | | | | | | |
| | | | 6985 | 6.912 | 33.423 | 6.633 | 33.918 | 4.21% | -1.46% | | | | | | | | | | | | | | | | | | | | | |
| | | | 6995 | 6.923 | 33.407 | 6.644 | 33.906 | 4.20% | -1.47% | | | | | | | | | | | | | | | | | | | | | |
| | | | 7000 | 6.929 | 33.398 | 6.650 | 33.900 | 4.20% | -1.48% | | | | | | | | | | | | | | | | | | | | | |
| | | | 7005 | 6.935 | 33.389 | 6.656 | 33.894 | 4.19% | -1.49% | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | 7025 | 6.958 | 33.352 | 6.680 | 33.870 | 4.16% |
| | | | 7500 | 7.553 | 32.505 | 7.240 | 33.300 | 4.32% | -2.39% | | | | | | | | | | | | | | | | | | | | | |
| | | | 7980 | 8.133 | 31.674 | 7.816 | 32.724 | 4.06% | -3.21% | | | | | | | | | | | | | | | | | | | | | |
| | | | 8000 | 8.160 | 31.652 | 7.840 | 32.700 | 4.08% | -3.20% | | | | | | | | | | | | | | | | | | | | | |

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.

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Prior to SAR assessment, the system is verified to $\pm 10\%$ 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 SAR System Validation Appendix.

Table 9-2
System Verification Results

| | System Verification | | | | | | | | | | | | | | | | | | | |
|-----------------|------------------------------|----------------|------------|----------------------|------------------------|-----------------------|--------------|-------------|---|--|--|-----------------------------|--|---|---|------------------------------|---|--|--|------------------------------|
| | | | | | | | | | | TARGE | T & MEASURI | ED | | | | | | | | |
| SAR System # | Tissue Frequency (MHz) | Tissue Type | Date | Amb. Temp (°C) | Liquid Temp (°C) | Input Power (W) | Source SN | Probe SN | Measured SAR ₁₉ (W/kg) | 1 W Target SAR _{1g} (W/kg) | 1 W Normalized SAR _{1g} (W/kg) | Deviation _{1g} (%) | Measured SAR _{10g} (W/kg) | 1 W Target SAR _{10g} (W/kg) | 1 W Normalized SAR _{10g} (W/kg) | Deviation _{10g} (%) | Measured 4cm ² APD (W/m ²) | 1W Target 4cm ² APD (W/m ²) | 1 W Normalized 4cm ² APD (W/m ²) | Deviation 4cm² APD (%) |
| AM2 | 6500 | Head | 05/30/2023 | 21.8 | 20.7 | 0.025 | 1019 | 7308 | 7.870 | 295.000 | 314.800 | 6.71% | 1.420 | 54.000 | 56.800 | 5.19% | 34.8000 | 1310.0000 | 1392.000 | 6.26% |

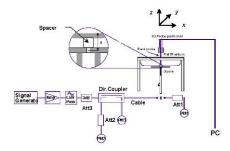


Figure 9-1
System Verification Setup Diagram



Figure 9-2
System Verification Setup Photo

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10 DATA SUMMARY

10.1 SAR and Absorbed Power Density Results

Table 10-1 6 GHz WLAN Head MIMO SAR

| | O OTE WEAR HOLD INNIO OAK | | | | | | | | | | | | | | | | | |
|---------|--|----------|---------|--------------------|----------------------------------|--------------------------|----------------------------------|---------------------|----------|---------------|--------------------|---------------------|-------------|------------|-------------------|-------------------------|----------------------|--------|
| | | | | | | | MEA | ASUREME | NT RESUL | _TS | | | | | | | | |
| FREQU | FREQUENCY | | Service | Bandwidth [MHz] | Conducted Power (Ant 1) [dBm] | Maximum Allowed Power | Conducted Power (Ant 2) [dBm] | Power Drift [dB] | Side | Test Position | Antenna Config. | Data Rate (Mbps) | Duty Cycle | SAR (1g) | Scaling Factor | Scaling Factor (Duty | Reported SAR (1g) | Plot # |
| MHz | Ch. | | | | , ,,, | (Ant 2) [dBm] | | | | | _ | | | (W/kg) | (Power) | Cycle) | (W/kg) | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 9.81 | 10.00 | 9.76 | -0.04 | Right | Cheek | MIMO | 68.1 | 99.70 | 0.070 | 1.057 | 1.003 | 0.074 | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 9.81 | 10.00 | 9.76 | -0.04 | Right | Tilt | MIMO | 68.1 | 99.70 | 0.052 | 1.057 | 1.003 | 0.055 | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 9.81 | 10.00 | 9.76 | -0.04 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.108 | 1.057 | 1.003 | 0.114 | A1 |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 9.81 | 10.00 | 9.76 | 0.15 | Left | Tilt | MIMO | 68.1 | 99.70 | 0.053 | 1.057 | 1.003 | 0.056 | |
| 5985.00 | 7 | 802.11ax | OFDM | 80 | 9.54 | 10.00 | 9.41 | -0.02 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.057 | 1.146 | 1.003 | 0.066 | |
| 6305.00 | 71 | 802.11ax | OFDM | 80 | 9.33 | 10.00 | 9.44 | 0.02 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.093 | 1.167 | 1.003 | 0.109 | |
| 6785.00 | 167 | 802.11ax | OFDM | 80 | 9.32 | 10.00 | 9.58 | -0.08 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.096 | 1.169 | 1.003 | 0.113 | |
| 7025.00 | 215 | 802.11ax | OFDM | 80 | 9.41 | 10.00 | 9.50 | 0.10 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.083 | 1.146 | 1.003 | 0.095 | |
| | ANSI / IEEE C95.1 1992 - SAFETY LIMIT | | | | | | | | | | | | Hea | ad | | | | |
| | Spatial Peak | | | | | | | 1.6 W/kg (mW/g) | | | | | | | | | | |
| | Uncontrolled Exposure/General Population | | | | | | | | | | | | averaged ov | ver 1 gram | | | | |

Note: To achieve the 13 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 10 dBm.

Table 10-2
6 GHz WLAN Head MIMO Absorbed Power Density

| FREQU | JENCY | Mode | Service | Bandwidth | Maximum Allowed Power | Conducted Power | Maximum Allowed Power | Conducted Power | Power Drift | Side | Test Position | Antenna | Data Rate | Duty Cycle | Measured APD | Scaling Factor | Scaling | Scaled APD | Plot# |
|---------|-------|----------|---------|-----------|--------------------------|-----------------|--------------------------|-----------------|-------------|-------|---------------|---------|-----------|------------|-----------------|-------------------|------------------------|-------------|-------|
| MHz | Ch. | Mode | Service | [MHz] | (Ant 1) [dBm] | (Ant 1) [dBm] | (Ant 2) [dBm] | (Ant 2) [dBm] | [dB] | Side | lest Position | Config. | (Mbps) | (%) | W/m² (4cm²) | (Power) | Factor (Duty Cycle) | W/m² (4cm²) | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 10.00 | 9.81 | 10.00 | 9.76 | -0.04 | Right | Cheek | MIMO | 68.1 | 99.70 | 0.402 | 1.057 | 1.003 | 0.426 | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 10.00 | 9.81 | 10.00 | 9.76 | -0.04 | Right | Tilt | MIMO | 68.1 | 99.70 | 0.247 | 1.057 | 1.003 | 0.262 | |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 10.00 | 9.81 | 10.00 | 9.76 | -0.04 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.677 | 1.057 | 1.003 | 0.718 | A1 |
| 6545.00 | 119 | 802.11ax | OFDM | 80 | 10.00 | 9.81 | 10.00 | 9.76 | 0.15 | Left | Tilt | MIMO | 68.1 | 99.70 | 0.265 | 1.057 | 1.003 | 0.281 | |
| 5985.00 | 7 | 802.11ax | OFDM | 80 | 10.00 | 9.54 | 10.00 | 9.41 | -0.02 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.184 | 1.146 | 1.003 | 0.211 | |
| 6305.00 | 71 | 802.11ax | OFDM | 80 | 10.00 | 9.33 | 10.00 | 9.44 | 0.02 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.580 | 1.167 | 1.003 | 0.679 | |
| 6785.00 | 167 | 802.11ax | OFDM | 80 | 10.00 | 9.32 | 10.00 | 9.58 | -0.08 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.536 | 1.169 | 1.003 | 0.628 | |
| 7025.00 | 215 | 802.11ax | OFDM | 80 | 10.00 | 9.41 | 10.00 | 9.50 | 0.10 | Left | Cheek | MIMO | 68.1 | 99.70 | 0.429 | 1.146 | 1.003 | 0.493 | |

Note: To achieve the 13 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 10 dBm.

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SAR and Absorbed Power Density General Notes:

- 1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
- 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 October 2020 TCB Workshop notes, absorbed power density (APD) using a 4cm2 averaging area is reported based on SAR measurements.
- 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 for 1g SAR and less than 2.0 W/kg for 10g SAR.

WLAN Notes:

- 1. Per KDB Publication 248227 D01v02r02, SAR for MIMO was evaluated by following the simultaneous SAR provisions from KDB Publication 447498 D01v06 by making a SAR measurement with both antennas transmitting simultaneously.
- 2. 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.
- 3. 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.
- 4. Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. Per October 2020 TCB Workshop notes, 5 channels were tested.

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11 EQUIPMENT LIST

| Manufacturer | Model | Description | Cal Date | Cal Interval | Cal Due | Serial Number |
|-----------------------|--------------|--|------------|--------------|------------|---------------|
| - | WL25-1 | Conducted Cable Set (25GHz) | 7/29/2022 | Annual | 7/29/2023 | WL25-1 |
| Agilent | N9038A | MXE EMI Receiver | N/A | N/A | N/A | MY51210133 |
| Rohde & Schwarz | FSW67 | Signal / Spectrum Analyzer | N/A | N/A | N/A | 103200 |
| Sunol | JB5 | Bi-Log Antenna (30M - 5GHz) | N/A | N/A | N/A | A051107 |
| Emco | 3115 | Horn Antenna (1-18GHz) | N/A | N/A | N/A | 9704-5182 |
| Amplifier Research | 15S1G6 | Amplifier | СВТ | N/A | СВТ | 433975 |
| Keysight Technologies | N9030A | 3Hz-44GHz PXA Signal Analyzer | 8/18/2022 | Annual | 8/18/2023 | MY49430494 |
| SPEAG | EX3DV4 | SAR Probe | 2/13/2023 | Annual | 2/13/2024 | 7308 |
| SPEAG | DAE4 | Dasy Data Acquisition Electronics | 2/15/2023 | Annual | 2/15/2024 | 467 |
| SPEAG | D6.5GHzV2 | 6.5GHz SAR Dipole | 12/7/2022 | Annual | 12/7/2023 | 1019 |
| Control Company | 4352 | Long Stem Thermometer | 9/10/2021 | Biennial | 9/10/2023 | 210774678 |
| Control Company | 4040 | Therm./Clock/Humidity Monitor | 1/17/2023 | Biennial | 1/17/2025 | 160574418 |
| Agilent | SMF100A | Signal Generator | 3/28/2022 | Biennial | 3/28/2024 | 101590 |
| SPEAG | DAK-3.5 | Dielectric Assessment Kit | 8/15/2022 | Annual | 8/15/2023 | 1041 |
| Mitutoyo | 500-196-30 | CD-6"ASX 6Inch Digital Caliper | 2/16/2022 | Triennial | 2/16/2025 | A20238413 |
| Rohde & Schwarz | ZNB40 | Vector Network Analyzer | 10/12/2022 | Annual | 10/12/2023 | 101412 |
| MCL | BW-N6W5+ | 6dB Attenuator | СВТ | N/A | СВТ | 1139 |
| Narda | BW-S3W2 | Attenuator (3dB) | СВТ | N/A | СВТ | 120 |
| MiniCircuits | ZUDC10-83-S+ | Directional Coupler | СВТ | N/A | СВТ | 2050 |
| Pasternack | PE5011-1 | Torque Wrench | 12/21/2021 | Biennial | 12/21/2023 | 82475 |
| Anritsu | MA2411B | Pulse Power Sensor | 1/10/2023 | Annual | 1/10/2024 | 1315051 |
| Anritsu | MA2411B | Pulse Power Sensor | 10/21/2022 | Annual | 10/21/2023 | 1207364 |
| SPEAG | MAIA | Modulation and Audio Interference Analyzer | N/A | N/A | N/A | 1520 |
| Pasternack | PE87FL1017 | Low Pass Filter | СВТ | N/A | СВТ | N/A |

Note:

- 1. Each equipment item 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.

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12 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements:

| a | b | С | d | e= | f | g | h = | i = | k |
|---|--------------|-------|-------|--------|------|--------|----------------|----------------|----------------|
| | | | | f(d,k) | | | c x f/e | c x g/e | |
| | IEEE | Tol. | Prob. | | Ci | Ci | 1gm | 10gms | |
| Uncertainty Component | 1528 Sec. | (± %) | Dist. | Div. | 1gm | 10 gms | u _i | u _i | V _i |
| | 000. | | | |) | Ü | (± %) | (± %) | |
| Measurement System | | | | | | | | | |
| Probe Calibration | E.2.1 | 9.3 | N | 1 | 1 | 1 | 9.3 | 9.3 | ∞ |
| Axial Isotropy | E.2.2 | 0.25 | Ν | 1 | 0.7 | 0.7 | 0.2 | 0.2 | ∞ |
| Hemishperical Isotropy | E.2.2 | 1.3 | Ν | 1 | 0.7 | 0.7 | 0.9 | 0.9 | ∞ |
| Boundary Effect | E.2.3 | 2 | R | 1.732 | 1 | 1 | 1.2 | 1.2 | ∞ |
| Linearity | E.2.4 | 0.3 | Ν | 1 | 1 | 1 | 0.3 | 0.3 | ∞ |
| System Detection Limits | E.2.4 | 0.25 | R | 1.732 | 1 | 1 | 0.1 | 0.1 | ∞ |
| Modulation Response | E.2.5 | 4.8 | R | 1.732 | 1 | 1 | 2.8 | 2.8 | ∞ |
| Readout Electronics | E.2.6 | 0.3 | Ν | 1 | 1 | 1 | 0.3 | 0.3 | ∞ |
| Response Time | E.2.7 | 0.8 | R | 1.732 | 1 | 1 | 0.5 | 0.5 | ∞ |
| Integration Time | E.2.8 | 2.6 | R | 1.732 | 1 | 1 | 1.5 | 1.5 | ∞ |
| RF Ambient Conditions - Noise | E.6.1 | 3 | R | 1.732 | 1 | 1 | 1.7 | 1.7 | ∞ |
| RF Ambient Conditions - Reflections | E.6.1 | 3 | R | 1.732 | 1 | 1 | 1.7 | 1.7 | ∞ |
| Probe Positioner Mechanical Tolerance | E.6.2 | 0.8 | R | 1.732 | 1 | 1 | 0.5 | 0.5 | ∞ |
| Probe Positioning w/ respect to Phantom | E.6.3 | 6.7 | R | 1.732 | 1 | 1 | 3.9 | 3.9 | ∞ |
| Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation | E.5 | 4 | R | 1.732 | 1 | 1 | 2.3 | 2.3 | 80 |
| 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 | Ν | 1 | 1 | 1 | 1.7 | 1.7 | 5 |
| Output Power Variation - SAR drift measurement | E.2.9 | 5 | R | 1.732 | 1 | 1 | 2.9 | 2.9 | ∞ |
| SAR Scaling | E.6.5 | 0 | R | 1.732 | 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 | 8 |
| Liquid Conductivity - measurement uncertainty | E.3.3 | 4.3 | Ν | 1 | 0.78 | 0.71 | 3.3 | 3.0 | 76 |
| Liquid Permittivity - measurement uncertainty | E.3.3 | 4.2 | Ν | 1 | 0.23 | 0.26 | 1.0 | 1.1 | 75 |
| Liquid Conductivity - Temperature Uncertainty | E.3.4 | 3.4 | R | 1.732 | 0.78 | 0.71 | 1.5 | 1.4 | ∞ |
| Liquid Permittivity - Temperature Unceritainty | E.3.4 | 0.6 | R | 1.732 | 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 | | | k=2 | | | | 27.6 | 27.1 | |
| (95% CONFIDENCE LEVEL) | | | | | | | | | |

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14 CONCLUSION

14.1 Measurement Conclusion

The SAR and power density measurements indicate that the DUT complies with the RF radiation exposure limits of the FCC, 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 RF Exposure 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.

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15 REFERENCES

- [1] ANSI/IEEE C95.1-1992, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, Sept. 1992.
- [2] IEC/IEEE 63195-1:2022, Assessment of power density of human exposure to radio frequency fields from wireless devices in close proximity to the head and body (frequency range of 6 GHz to 300 GHz)
- [3] IEC TR 62630: 2010, Guidance for Evaluating Exposure from Multiple Electromagnetic Sources
- [4] K. Pokovic, T. Schmid, J. Frohlich, and N. Kuster. Novel Probes and Evaluation Procedures to Assess Field Magnitude and Polarization. IEEE Transactions on Electromagnetic Compatibility 42(2): 240 -244, 2000
- [5] R. W. Gerchberg and W. O. Saxton. A Practical Algorithm for the Determination of Phase from Image and Diffraction Plane Pictures. Optik 35(2): 237 246, 1972
- [6] A. P. Anderson and S. Sali. New Possibilities for Phaseless Microwave Diagnostics. Part 1: Error Reduction Techniques. IEE Proceedings H – Microwaves, Antennas and Propagation 132(5): 290 – 298, 1985
- [7] FCC KDB 865664 D02 v01r04: SAR Measurement Requirements for 100 MHz to 6 GHz. Federal Communications Commission – Office of Engineering and Technology, Laboratory Division.
- [8] FCC KDB 447498 D01 v02r01: RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices. Federal Communications Commission – Office of Engineering and Technology, Laboratory Division.
- [9] November 2017 Telecommunications Certification Body Council (TCBC) Workshop Notes
- [10] October 2018 Telecommunications Certification Body Council (TCBC) Workshop Notes
- [11] April 2019 Telecommunications Certification Body Council (TCBC) Workshop Notes
- [12] November 2019 Telecommunications Certification Body Council (TCBC) Workshop Notes
- [13] SPEAG DASY6 System Handbook (September 2019)
- [14] SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz)
- [15] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.
- [16] ANSI/IEEE C95.1-2005, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, 2006.
- [17] ANSI/IEEE C95.3-2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields RF and Microwave, New York: IEEE, December 2002.
- [18] IEEE Standards Coordinating Committee 39 –Standards Coordinating Committee 34 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 ID: A3LSMF731U | 6 GHZ RF EXPOSURE EVALUATION | Approved by: Technical Manager |
|--------------------------------------|------------------------------|-----------------------------------|
| Document S/N: 1M2305260069-03.A3L | DUT Type: Portable Handset | Page 23 of 25 |



- [19] NCRP, National Council on Radiation Protection and Measurements, Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields, NCRP Report No. 86, 1986. Reprinted Feb. 1995.
- [20] T. Schmid, O. Egger, N. Kuster, Automated E-field scanning system for dosimetric assessments, IEEE Transaction on Microwave Theory and Techniques, vol. 44, Jan. 1996, pp. 105-113.
- [21] K. Pokovic, T. Schmid, N. Kuster, Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies, ICECOM97, Oct. 1997, pp. 1 -124.
- [22] K. Pokovic, T. Schmid, and N. Kuster, E-field Probe with improved isotropy in brain simulating liquids, Proceedings of the ELMAR, Zadar, Croatia, June 23-25, 1996, pp. 172-175.
- [23] Schmid & Partner Engineering AG, Application Note: Data Storage and Evaluation, June 1998, p2.
- [24] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, The Dependence of EM Energy Absorption upon Human Modeling at 900 MHz, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.
- [25] N. Kuster and Q. Balzano, Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.
- [26] G. Hartsgrove, A. Kraszewski, A. Surowiec, Simulated Biological Materials for Electromagnetic Radiation Absorption Studies, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.
- [27] Q. Balzano, O. Garay, T. Manning Jr., Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.
- [28] W. Gander, Computermathematick, Birkhaeuser, Basel, 1992.
- [29] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.
- [30] N. Kuster, R. Kastle, T. Schmid, Dosimetric evaluation of mobile communications equipment with known precision, IEEE Transaction on Communications, vol. E80-B, no. 5, May 1997, pp. 645-652.
- [31] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields High-frequency: 10kHz-300GHz, Jan. 1995.
- [32] Prof. Dr. Niels Kuster, ETH, Eidgenössische Technische Hoschschule Zürich, Dosimetric Evaluation of the Cellular Phone.
- [33] IEC 62209-1, Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices Part 1: Devices used next to the ear (Frequency range of 300 MHz to 6 GHz), July 2016.
- [34] Innovation, Science, Economic Development Canada RSS-102 Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands) Issue 5, March 2015.
- [35] Health Canada Safety Code 6 Limits of Human Exposure to Radio Frequency Electromagnetic Fields in the Frequency Range from 3 kHz – 300 GHz, 2015
- [36] FCC SAR Test Procedures for 2G-3G Devices, Mobile Hotspot and UMPC Devices KDB Publications 941225, D01-D07

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|--|------------------------------|-----------------------------------|
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- [37] SAR Measurement Guidance for IEEE 802.11 Transmitters, KDB Publication 248227 D01
- [38] FCC SAR Considerations for Handsets with Multiple Transmitters and Antennas, KDB Publications 648474 D03-D04
- [39] FCC SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers, FCC KDB Publication 616217 D04
- [40] FCC SAR Measurement and Reporting Requirements for 100MHz 6 GHz, KDB Publications 865664 D01-D02
- [41] FCC General RF Exposure Guidance and SAR Procedures for Dongles, KDB Publication 447498, D01-D02
- [42] Anexo à Resolução No. 533, de 10 de Septembro de 2009.
- [43] IEC 62209-2, Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices Human models, instrumentation, and procedures Part 2: Procedure to determine the specific absorption rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz), Mar. 2010.
- [44] ANSI/IEEE C95.1-1992, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, Sept. 1992.

| FCC ID: A3LSMF731U | 6 GHZ RF EXPOSURE EVALUATION | Approved by: Technical Manager |
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