

# **SAR Test Report**

# **Test Report No.: 14993588H-A**



**Representative test engineer Approved by** 

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# **REVISION HISTORY**

# **Original Test Report No. 14993588H-A**





### **Reference: Abbreviations (Including words undescribed in this report)**





# **SECTION 0: Introduction**

Purpose of this report is for assessment which is only for replaced the simultaneously transmission WLAN module. This WWAN module has Time-averaging SAR functionality (TAS) described in test report issued by UL Japan, which is not affected to TAS assessment by the change in the WLAN module.

Table. 1 WWAN original certification number

FCC ID	ACJ9TGWW21A	Report number	14131461H-A, B, C
			14809943H-A. B. C
<b>ISED</b> certification number	216H-CFWW21A	Report number	14131461H-D. E. F
			respectively part 0,1,2

# **SECTION 1: Customer information**



#### \*Remarks:

Panasonic Connect Co., Ltd. is on behalf of the applicator: Panasonic Corporation of North America (Company incorporated abroad).

The information provided by the customer is as follows;

- Customer, Description of EUT, Model No., FCC ID on the cover and other relevant pages
- Operating/Test Mode(s) (Mode(s)) on all the relevant pages
- SECTION 1: Customer information
- SECTION 2: Equipment under test (EUT) other than the Receipt Date
- SECTION 6: WWAN exposure level
- SECTION 7: Tune-up tolerance information and software information

# **SECTION 2: Equipment under test (EUT)**

### 2.1 Identification of FUT



<Information of Host device>



# 2.2 Product description

### **General Specification**



### **Radio Specification**

Model: WW21A is a Wireless Module. In this test report, referred to as the *5G module.*





Wireless module (Tested inside of Panasonic Personal Computer FZ-40) Model: WL23B (FCC ID ACJ9TGWL23B / ISED certification number 216H-CFWL23B)

# 2.3 WWAN Antenna configuration

The 5G module antenna configuration consists below combination and supports Tx/Rx configurations.



The WWAN transmitter operates independently of the WLAN/BT wireless transmitter in the device, and it only supports data transmission.



# **SECTION 3: Test standard information**

3.1 Test Specification



# 3.2 Published RF exposure KDB procedures



# 3.3 Work Procedures



# 3.4 Additions or deviations to standard

No addition, exclusion nor deviation has been made from the standard.

### 3.5 References

- [1] Schmid & Partner Engineering AG, DASY Manual
- [2] IEC/IEEE 62209-1528 Edition 1.0 2020-10
- [3] RF Exposure Policies and Procedures: TCB Workshop October 2020

## 3.6 Additions or deviations to standard

Other than above, no addition, exclusion nor deviation has been made from the standard.

# 3.7 Limit

3.7.1 For SAR (FCC)

### (A) Limits for Occupational/Controlled Exposure (W/kg)



(B) Limits for General population/Uncontrolled Exposure (W/kg)



**Occupational/Controlled Environments:** are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure, (i.e. because of employment or occupation).

**General Population/Uncontrolled Environments:** are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

1.6 W/kg limit is applied.

### 3.7.2 For PD (Above 6 GHz) (FCC)



Note: 1.0 mW/cm<sup>2</sup> is 10 W/m<sup>2</sup><br>1.0 mW/cm<sup>2</sup> limit is applied.

# **SECTION 4: Location**

UL Japan, Inc. Ise EMC Lab. Shielded room for SAR testing \*A2LA Certificate Number: 5107.02 / FCC Test Firm Registration Number: 884919 ISED Lab Company Number: 2973C / CAB identifier: JP0002 4383-326 Asama-cho, Ise-shi, Mie-ken 516-0021 JAPAN Telephone : +81-596-24-8999

# **SECTION 5: Definitions, symbols, and abbreviations**

# 5.1 Definitions



Maximum Tune-up tolerance limit : Tolerance power specified by customer.

Tune up limit or Tune-up limit : same as Maximum Tune-up tolerance limit.

# 5.2 Symbols



# **SECTION 6: Test result**

### 6.1 verdict

Complied

### 6.2 Stand-alone SAR result

The 5G module result for this device is quoted from original report details in SECTION 0. WWAN 0.4 W/kg and 1.0 W/kg respectively 1g and 10g for bottom side and keyboard excluding n41. WWAN 0.06 W/kg and 0.31 W/kg respectively 1g and 10g for bottom side and keyboard for n41.

#### WLAN result





## 6.3 Simultaneous transmission SAR result

Simultaneous Transmission Body: 1.52 W/kg1g Limbs: 3.88 W/kg<sub>10g</sub>

See SECTION 13.

# 6.4 Measurement uncertainty

This measurement uncertainty budget is suggested by IEC/IEEE 62209-1528 and determined by Schmid & Partner Engineering AG (DASY5/6 Uncertainty Budget). Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz Section 2.8.1., when the highest measured SAR(1 g) within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEC/IEEE 62209-1528 is not required in SAR reports submitted for equipment approval.



#### 300 MHz to 6 GHz for SAR

Note: This uncertainty budget for validation is worst-case. Table of uncertainties are listed for ISO/IEC 17025.



This measurement uncertainty budget is suggested by IEC/IEEE 63195 and determined by Schmid & Partner Engineering AG (DASY6 Uncertainty Budget). 6 GHz to 10 GHz for PD

Note: This uncertainty budget for validation is worst-case.

Table of uncertainties are listed for ISO/IEC 17025.

# **SECTION 7: Tune-up tolerance information and software information**













For WLAN Maximum tune-up tolerance limit is defined by a customer as duty100%.

# 7.2 Software setting

#### **Software setting**

\*The power value of the EUT was set for testing as follows (setting value might be different from product specification value); Software: DRTU version 05158.23.10.0<br>Power settings: Shown in SECTION 12 Shown in SECTION 12

\*This setting of software is the worst case.

The test was performed with condition that obtained the maximum average power (Burst) in pre-check.

Any conditions under the normal use do not exceed the condition of setting.

In addition, end users cannot change the settings of the output power of the product.

## 7.3 Duty



# **SECTION 8: SAR Exposure Conditions (Test Configurations)**

# 8.1 SAR test exclusion considerations according to KDB 447498 D01

## 8.1.1 Test Configurations for the WWAN-main



### 8.1.2 Test Configurations for the WWAN-4th



# 8.2 SAR test exclusion considerations for simultaneous transmission

#### 8.2.1 Below 100 MHz

KDB 447498D01(v06) has the following exclusion for portable devices: The SAR test exclusion thresholds for below 100 MHz at test separation distances ≤ 50 mm are determined by step c) 2):

- c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion:
	- 1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by  $[1 + log(100 / f(MHz))]$
	- 2) For test separation distances  $\leq 50$  mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by ½

Numeric exemption threshold:



Radio specification and use-case for this deveice are below:



f [MHz]: Operating frequency

d [mm]: Minimum separation distance

This is less than Pth step c), so SAR test is exemption for this device.

## 8.2.2 Above 100 MHz

### 8.2.3 Test Configurations for the WLAN-main



# 8.2.4 Test Configurations for the WLAN-aux (BT)



# **SECTION 9: SAR System Check**

All reference equipment and value which is calibrated by Speag are listed in appendix.

## 9.1 Dielectric Property

The dielectric parameters were checked prior to assessment using the DAK dielectric probe kit.

According to KDB 865664 D01 or IEC/IEEE 62209-1528, the dielectric constant (εr) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within 5% of the required target values for a range of approximately 50 MHz at frequencies below 300 MHz. At above 3 GHz, 5% tolerance can usually be maintained for  $\pm$  100 MHz or more.

For SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013 or IEC/IEEE 62209-1528, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for εr and  $\sigma$  may be relaxed to  $\pm$  10% ( $\leq$  3 GHz).

The dielectric parameters were linearly interpolated between the closest pair of target frequencies defined in KDB 865664D01 to determine the applicable dielectric parameters corresponding to the device test frequency for measurement.

Listed conductivity and relative permittivity values including the target are rounded one or two decimal places due to significant digit, so some differences might be observed, and actual SAR calculation is done four decimal places.



Table 9-1 standard parameters on the KDB 865664 D01

Table 9-2 Directric Property Measurements Result:



# 9.2 SAR System check

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

The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters. The depth of tissue-equivalent liquid in a phantom must be  $\geq 15.0$  cm  $\pm 0.5$  cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm  $±$  0.5 cm for measurements > 3 GHz.

The DASY system with an E-Field Probe was used for the measurements.

The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom).

The standard measuring distance was 10 mm (above 1 GHz to 6 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.

The coarse grid with a grid spacing of 15 mm (below 2 GHz), 12 mm (2 GHz to 4 GHz) and 10 mm (4 GHz to 6 GHz) was aligned with the dipole.

Around this point found in the coarse grid, a volume of 30 mm x 30 mm x 30 mm or more was assessed by measuring 7 x 7 x 7 points at least for below 3 GHz, a volume of 28 mm x 28 mm x 34 mm or more was assessed by measuring 8 x 8 x 8(ratio step method) points at least for 3 GHz to 5 GHz and a volume of 28 mm x 28 mm x 24 mm or more was assessed by measuring 8 x 8 x 8(ratio step method) points at least for 5 GHz to 6 GHz.

Distance between probe sensors and phantom surface was set to 1.4 mm.

The dipole input power (forward power) was 100 mW or 250 mW.

The results are normalized to 1 W input power.

The target(reference) SAR values can be obtained from the calibration certificate of system validation dipoles(Refer to Appendix ). The target SAR values are SAR measured value in the calibration certificate scaled to 1 W.

# 9.3 System Check Results

# 9.3.1 SAR



# **SECTION 10: IPD System Check**

# 10.1 Dielectric Property

Media is air so Relative Permittivity (єr) and Conductivity (σ) are 1 and 0 respectively.

# 10.2 System Check

System validation is required before a system is deployed for measurement

Peak and spatially averaged power density at the peak location(s) must be compared to calibrated results according to the defined test conditions

- the same spatial resolution and measurement region used in the waveguide calibration should be applied to system validation and system check
- power density distribution should also be verified, both spatially (shape) and numerically (level) through visual inspection for noticeable differences
- the measured results should be within 0.66 dB\* of the calibrated targets
- \* Within 0.66 dB is recommended by SPEAG(Schmid & Partner Engineering AG).

## 10.3 Setting

Then create a measurement file with a test distance of 10mm for 10 GHz and 5.55mm for 30 GHz and above (the later will account for the retracted location of the horn aperture towards the top surface of a verification source). Use the scan settings defined in below table.



Table 10-1 Grid setting

### 10.4 Radiating source description and PD distribution for each frequency band.

System verification device consists of a 10 GHz, 30 GHz, 60 GHz, 90 GHz band horn antenna with corresponding Gunn oscillator packaged within a cube-shaped housing. Power supply provided.

ISO 17025 calibrated frequency: 10 GHz, 30 GHz, 60 GHz, 90 GHz at 10mm from the antenna (5.55 mm from the case surface) Frequency accuracy: ±100 MHz E-field polarization: linear Total radiated power: 14 dBm (typ) Power stability: 0.15 dB (after 30 min warmup) Power consumption: 20 W (10 GHz) / 5 W (max) (30 GHz, 60 GHz, 90 GHz) Size: 100 x 100 x 100 mm (30 GHz, 60 GHz, 90 GHz) Weight: 700 g (10 GHz) / 1 kg (30 GHz, 60 GHz, 90 GHz)

# 10.5 System Check

System verification is required before a system is deployed for measurement.

Peak and spatially averaged power density at the peak location(s) must be compared to calibrated results according to the defined test conditions:

- the same spatial resolution and measurement region used in the waveguide calibration should be applied to system validation and system check.
- power density distribution should also be verified, both spatially (shape) and numerically (level) through visual inspection for noticeable differences.
- the measured results should be within 0.66B of the calibrated targets.

**Criteria** 

$$
\Delta psPD_{tgt} = \left| 10 \times \log \left\{ \frac{psPD_{meas}}{psPD_{tgt}} \right\} \right| < \min(2 \times |u_c|, 2 \, dB)
$$

$$
u_{relative} = \sqrt{u^{2}antentena\_cal + u^{2power} + u^{2meas}}
$$
  
2 ×  $u_{relative} = \sqrt{0.64^2 + 0.635^2 + 0.21^2} = 1.85 dB$ 

*Where* 



But Speag declares that difference is expected to be below 0.66 dB.

# 10.6 System Check Results

Table 10-2 PD system check result



# **SECTION 11: SAR / IPD Measurements**

### 11.1 Measurement configuration for SAR

11.1.1 SAR evaluation procedure

#### **The evaluation was performed with the following procedure:**

**Step 1:** Measurement of the E-field at a fixed location above the ear point or central position of flat phantom was used as a reference value for assessing the power drop.

**Step 2:** The SAR distribution at the exposed side of head or body position was measured at a distance of each device from the inner surface of the shell. The area covered the entire dimension of the antenna of EUT and the horizontal grid spacing was 15 mm x 15 mm, 12 mm x 12 mm**,** 10 mm x 10 mm or 8.5 mm x 8.5 mm. Based on these data, the area of the maximum absorption was determined by spline interpolation.

**Step 3:** Around this point found in the Step 2 (area scan), a volume of 30 mm x 30 mm x 30 mm or more was assessed by measuring 7 x 7 x 7 points at least for below 3 GHz, a volume of 28 mm x 28 mm x 34 mm or more was assessed by measuring 8 x 8 x 8(ratio step method (\*1)) points at least for 3 GHz to 5 GHz, a volume of 28 mm x 28 mm x 24 mm or more was assessed by measuring 8 x 8 x 8(ratio step method) points at least for 5 GHz to 6 GHz and a volume of 22 mm x 22 mm x 22 mm

And for any secondary peaks found in the Step2 which are within 2 dB of maximum peak and not with this Step3 (Zoom scan) is repeated. On the basis of this data set, the spatial peak SAR value was evaluated under the following procedure:

(1). The data at the surface were extrapolated, since the center of the dipoles is 1 mm(EX3DV4) away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.3 mm. The extrapolation was based on a least square algorithm [4]. A polynomial of the fourth order was calculated through the points in z-axes.

This polynomial was then used to evaluate the points between the surface and the probe tip.

(2). The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1 g or 10 g) were computed by the 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 integrated with the trapezoidal-algorithm. One thousand points (10 x 10 x 10) were interpolated to calculate the average.

(3). All neighboring volumes were evaluated until no neighboring volume with a higher average value was found

#### **\*1. Ratio step method parameters used;**

### **The first measurement point: 1.4 mm from the phantom surface, the initial grid separation: 1.4 mm, subsequent graded grid ratio: 1.4**

#### **These parameters comply with the requirement of the KDB 865664 D01.**

**Step 4**: Re-measurement of the E-field at the same location as in Step 1. Confirmation after SAR testing

It was checked that the power drift [W] is within +/-5 %. The verification of power drift during the SAR test is that DASY system calculates the power drift by measuring the e-filed at the same location at beginning and the end of the scan measurement for each test position.

DASY system calculation Power drift value[dB] = 20log(Ea)/(Eb) Before SAR testing : Eb [V/m] After SAR testing : Ea [V/m]

Limit of power drift[W] =  $+/$ - 5 %  $X[dB] = 10log[P] = 10log(1.05/1) = 10log(1.05) - 10log(1) = 0.212 dB$ 

from E-filed relations with power. p=E^2/η Therefore, The correlation of power and the E-filed

 $X$  dB = 10log(P) = 10log(E)^2 = 20log(E)

Therefore,

The calculated power drift of DASY System must be the less than +/- 0.212 dB.



Stop size

#### 11.1.2 IPD evaluation procedure

#### 11.1.2.1 Computation of the Electric Field Polarization Ellipse

For the numerical description of an arbitrarily oriented ellipse in three-dimensional space, five parameters are needed: the semi-major axis (a), the semi-minor axis (b), two angles describing the orientation of the normal vector of the ellipse (ϕ, θ), and one angle describing the tilt of the semi-major axis (ψ). For the two extreme cases, i.e., circular and linear polarizations, only three parameters (a, ϕ, and θ) are sufficient for the description of the incident field.

For the reconstruction of the ellipse parameters from measured data, the problem can be reformulated as a nonlinear search problem. The semi-major and semi-minor axes of an elliptical field can be expressed as functions of the three angles ( $\phi$ ,  $\theta$ , and  $\psi$ ). The parameters can be uniquely determined to minimize the error based on least-squares for the given set of angles and the measured data. In this way, the number of free parameters is reduced from five to three, which means that at least three sensor readings are necessary to gain sufficient information for the reconstruction of the ellipse parameters. However, to suppress the noise and increase the reconstruction accuracy, it is desirable to overdetermine the system of equations. The solution to use a probe consisting of two sensors angled by γ1 and γ2 toward the probe axis and to perform measurements at three angular positions of the probe, i.e., at β1, β2, and β3, results in overdeterminations by a factor of two. If more information or increased accuracy is required, more rotation angles can be added.

The reconstruction of the ellipse parameters can be separated into linear and non-linear parts that are best solved by the Givens algorithm combined with a downhill simplex algorithm. To minimize the mutual coupling, sensor angles are set with a shift of 90 $\degree$  (γ2 = γ1 + 90 $\degree$ ), and, for simplification, the first rotation angle of the probe ( $β1$ ) can be set to 0°. More details can be found in [1]



Figure 1 Numerical algorithm for reconstructing the ellipse parameters

11.1.3 Total Field and Power Flux Density Reconstruction

### 11.1.3.1 Plane-to-Plane Phase Reconstruction (PTP-PR)

Computation of the PD in general requires knowledge of the electric (E-) and magnetic (H-) field amplitudes and phases in the plane of incidence. Reconstruction of these quantities from pseudo-vector E-field measurements is feasible, as they are constrained by Maxwell's equations. The Plane-to-Plane Phase Reconstruction (PTP-PR) reconstruction approach based on the Gerchberg-Saxton algorithm [2] [3], which benefits from the availability of the E-field polarization ellipse information obtained with the EUmmWVx probe. This reconstruction algorithm, together with the ability of the probe to measure extremely close to the source without perturbing the field, permits reconstruction of the E- and H-fields and the PD on measurement planes located as near as  $\lambda/2\pi$  [3]. At closer distances, the uncertainty might be larger.

### 11.1.3.2 Equivalent Source Reconstruction (ESR)

In order to overcome the main limitations of PTP-PR at distances  $d \leq \lambda/2\pi$  from the EUT, i.e., in the reactive near-field and beyond planar evaluation surfaces, SPEAG and the IT'IS Foundation (Zurich, Switzerland) have joined forces in a research collaboration to develop a novel equivalent source reconstruction (ESR) algorithm, that models an unknown and inaccessible transmitter not anymore in terms of plane waves but as a set of distributed known auxiliary sources below the surface of the device enclosure. The locations, amplitudes, and phases of these sources are then determined to reconstruct the measured near-fields optimally. As a result, the transmitters inside any enclosure can be replaced with these equivalent sources in any radiation problem, including exposure assessment scenarios. ESR even enables back transformation within a limited range. This approach has three main advantages:

- lower reconstruction errors in the reactive near-field regions, which ease compliance testing of EUT operating in the 6 to 24 GHz frequency range
- evaluation of phones with non-planar surfaces, e.g., a flat surface with a protruding camera module
- possibility to perform phase reconstruction in any parts of the radiation region without any limitation to planar measurement domains. In other words, measurements can be done on a conformal surface or even on scattered points in the radiation domain and still obtain reliable data on the phase variations. This opens the way for evaluations on non-planar device surfaces (e.g., virtualreality goggles) and enables full-wave simulations using measurement results only, i.e., without requiring models for the transmitters.

### 11.1.3.3 Power Flux Density Averaging

The average of the reconstructed power density is evaluated on the measurement plane. Two averaging geometries are available: a circle and a rotating square. The averaging area is defined by the user; typical values are 1 cm<sup>2</sup> and 4 cm<sup>2</sup>. The three variants of the spatial-average Power Density (sPD) defined in the IEC 63195 standard draft are computed by integration of the Poynting vector:

- *sPDn+:* surface normal propagating power flux density into the phantom
- *sPDtot+:* total propagating power flux density into the phantom
- *sPDmod+*: total power flux density into the phantom considering near-field exposure.

### 11.1.4 Scan method(s)

The system moves over and measures the area that encompasses the radiational source with specified scan set up. After acquiring the data, the system calculates the power density.

Scan setup: The details such as steps, sensor surface distance and grid extent are included in the plot data.

Algorithm: the ESR algorithm will be used for measurements ≤ 24 GHz and the PTP-PR algorithm above > 24 GHz

Step size: The default grid step is calculated from the measurement distance and test frequency. The grid extents should not be less than 2λ, or 16x16 points.

#### Scan dimension



#### 11.1.5 Laboratory Requirements



a) b) values are conformed annually.

# **SECTION 12: WLAN additional testing for simultaneous measurement**

# 12.1 Output Power and SAR test required

According to KDB 248227 D01, the initial test configuration for 2.4 GHz, 5 GHz, 6 GHz OFDM or OFDMA transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple configurations in a frequency band have the same specified maximum output power, the initial test configuration is determined according to the following steps applied sequentially.

- 1. The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
- 2. If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
- 3. If multiple configurations have the same specified maximum output power, largest channel bandwidth and lowest order modulation, the lowest data rate configuration among these configurations is selected.
- 4. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n.

# 12.1.1 WLAN power results



## 12.1.2 BT power results



# 12.2 KDB 248227 D01 (SAR Guidance for 802.11(Wi-Fi) Transmitters):

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

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

- $\leq$   $\leq$  0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- > 0.4 W/kg, SAR is repeated using the same wireless mode test configuration tested in the *initial test position* to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the *reported* SAR is ≤ 0.8 W/kg or all required test positions are tested.
	- o For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
	- When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the *initial test position* and subsequent test positions, when the *reported* SAR is > 0.8 W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the *reported* SAR is ≤ 1.2 W/kg or all required test channels are considered.
	- The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- $\diamond$  When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is ≤ 1.2 W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is ≤ 1.2 W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

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

# 12.3 Result of SAR

Below 6 GHz: SAR Above 6 GHz: IPD

# 12.4 Result of bottom (FCC)

### 12.4.1 WLAN 2.4 GHz



### 12.4.2 WLAN 5.3 GHz



### 12.4.3 WLAN 5.6 GHz



### 12.4.4 WLAN 5.8 GHz



### 12.4.5 WLAN 5.9 GHz



### 12.4.6 WLAN 6.2 GHz



#### 12.4.7 WLAN 6.5 GHz



#### 12.4.8 WLAN 6.7 GHz



### 12.4.9 WLAN 7 GHz



# 12.5 Keyboard

### 12.5.1 WLAN 2.4 GHz



#### 12.5.2 WLAN 5.3 GHz



## 12.5.3 WLAN 5.6 GHz



### 12.5.4 WLAN 5.8 GHz



### 12.5.5 WLAN 5.9 GHz



### 12.5.6 WLAN 6.2 GHz



#### 12.5.7 WLAN 6.5 GHz



#### 12.5.8 WLAN 6.7 GHz



## 12.5.9 WLAN 7 GHz



# **SECTION 13: Simultaneous transmission SAR test exclusion considerations**

NFC exposure information is quoted from ACJ9TGRI21A or ACJ9TGRI23A submission documents.

### 13.1 Sum and SPLSR

KDB 447498 D01 General RF Exposure Guidance provides two procedures for determining simultaneous transmission SAR test exclusion: Sum of SAR and SAR to Peak Location Ratio (SPLSR)

### **Sum of SAR**

To qualify for simultaneous transmission SAR test exclusion based on sum of SAR, the sum of the reported standalone SARs for all simultaneously transmitting antennas shall be below the applicable standalone SAR limit. If the sum of the SARs is above the applicable limit, then simultaneous transmission SAR test exclusion may still apply if the requirements of the SAR to Peak Location Ratio (SPLSR) evaluation are met. When a pair of the summation is above 1.58 W/kg for 1g SAR, then SAR to Peak Location Ratio (SPLSR) is performed, as conservative even though applicable limit is 1.6 W/kg. finally sum of SAR value is convert to TER, see next section.

Simultaneous transmission for ENDC mode is treated on part2 test report.

### **SAR to Peak Location Ratio (SPLSR)**

KDB 447498 D01 General RF Exposure Guidance explains how to calculate the SAR to Peak Location Ratio (SPLSR) between pairs of simultaneously transmitting antennas:

$$
SPLSR = (SAR_1 + SAR_2)^{1.5}/Ri
$$

Where:

**SAR<sub>1</sub>** is the highest reported or estimated SAR for the first of a pair of simultaneous transmitting antennas, in a specific test operating mode and exposure condition

**SAR<sub>2</sub>** is the highest reported or estimated SAR for the second of a pair of simultaneous transmitting antennas, in the same test operating mode and exposure condition as the first

*Ri* is the separation distance between the pair of simultaneous transmitting antennas. When the SAR is measured, for both antennas in the pair, it is determined by the actual x, y and z coordinates in the 1-g SAR for each SAR peak location, based on the extrapolated and interpolated result in the zoom scan measurement, using the formula of

 $[(x_1-x_2)^2 + (y_1-y_2)^2 + (z_1-z_2)^2]$ 

In order for a pair of simultaneous transmitting antennas with the sum of 1-g SAR > 1.6 W/kg to qualify for exemption from Simultaneous Transmission SAR measurements, it has to satisfy the condition of: *(SAR1 + SAR2) 1.5 /Ri ≤ 0.04* 

When an individual antenna transmits at on two bands simultaneously, the sum of the highest *reported* SAR for the frequency bands should be used to determine *SAR1*.or *SAR2*. When SPLSR is necessary, the smallest distance between the peak SAR locations for the antenna pair with respect to the peaks from each antenna should be used.

The antennas in all antenna pairs that do not qualify for simultaneous transmission SAR test exclusion must be tested for SAR compliance, according to the enlarged zoom scan and volume scan post-processing procedures in KDB Publication 865664 D01

13.1.1 Simultaneous transmission consideration.

To calculate, output power is quoted from highest tune up limit for each band. Calculations are worst case of all combinations for compliance.

13.1.2 Below 6 GHz for bottom side

WWAN / NFC / WLAN-BT aux antenna (Below 6GHz) is estimated value, 0.4 W/kg. WWAN + NFC + WLAN-BT aux antenna (Below 6GHz) + WLAN main antenna (Below 6GHz)  $= (0.4 + 0.4 + 0.4 + 0.318)$  W/kg = 1.52 W/kg

13.1.3 Below 6 GHz for keyboard side

WWAN / NFC / WLAN-BT aux antenna (Below 6GHz) is estimated value, 1.0 W/kg. WWAN + NFC + WLAN-BT aux antenna (Below 6GHz) + WLAN main antenna (Below 6GHz)  $= (1.0 + 1.0 + 1.0 + 0.881)$  W/kg = 3.88 W/kg

13.1.4 Above 6 GHz

According to the FCC section § 1.1310, the following information provides the minimum separation distance for the highest gain antenna provided with the EUT calculated from (B) Limits for General Population / Uncontrolled Exposure of TABLE 1- LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE) of §1.1310 Radiofrequency radiation exposure limits.

Power Density =  $\frac{Power[mW] \times Gain[numeric]}{4 \pi (Separation distance: 20 cm)^2}$ 

Power Density Result = 0.01537 mW / cm2

For WLAN-BT Antenna, 0.02 for calculation.

13.1.5 Above 6 GHz for bottom side

WWAN + NFC + WLAN-BT aux antenna (Above 6GHz) + WLAN main antenna (Above 6GHz)  $=(0.4 + 0.4) / 1.6 + 0.02 + 0.03 = 0.56 < 1$ 

13.1.6 Above 6 GHz for keyboard side WWAN + NFC + WLAN-BT aux antenna (Above 6GHz) + WLAN main antenna (Above 6GHz)  $=$  (1.0 + 1.0) / 4.0 + 0.02 + 0.236 = 0.76 < 1

13.2 Conclusion

Complied.

# **SECTION 14: Test instrument**

# 14.1 For power measurement



## 14.2 For SAR and PD





Lims ID 213581 is used within due date.

\*Hyphens for Last Calibration Date and Cal Int (month) are instruments that Calibration is not required (e.g.

software), or instruments checked in advance before use.

The expiration date of the calibration is the end of the expired month.

As for some calibrations performed after the tested dates, those test equipment have been controlled by means of an unbroken chains of calibrations.

All equipment is calibrated with valid calibrations. Each measurement data is traceable to the national or international standards.

# 14.3 Test system



### 14.3.2 Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE4 or DAE3) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16-bit AD-converter, and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.

#### 14.3.3 Probes (SAR)

Dosimetric Probes: These probes are specially designed and calibrated for use in liquids with high permittivities. They should not be used in air, since the spherical isotropy in air is poor (+/- 2 dB). The dosimetric probes are specially calibrated in various liquids at different frequencies.

#### 14.3.4 Probes (mmWave)

Dimensions and spatial resolutions: Overall length: 320 mm (tip: 20 mm) Tip diameter: encapsulation 8 mm (internal sensor <1mm) Distance from probe tip to dipole centers: <2 mm Sensor displacement to probe's calibration point: <0.3 mm linearity error and isotropy: included by calibration data dynamic range: <50 – 10'000 V/m with PRE-10 (min <50 – 3000 V/m)

#### 14.3.5 EOC

The electrooptical converter (EOC), which is mounted on the robot arm. An internal data link is used from the EOC to the robot back panel. From there, a 10-meter cable connects to the measurement server DAE input.

### 14.3.6 Robot

The DASY6 system uses the high precision industrial robots TX60L from Stuaubli SA (France).

### 14.3.7 Simulated Tissues (Liquid)

series of tissue simulating liquids are available for various testing applications. The dielectric parameters of these liquids are matched to the target tissue parameters over a certain frequency range. A summary of available liquids is as follows:



### 14.3.8 Others

The SAR phantom, mmW phantom, the device holder and other accessories according to the targeted measurement.

# **SECTION 15: Appendixes**

Refer to separated files for the following appendixes.

- Appendix A: DUT and SAR Setup Photos
- Appendix B: SAR Measurement data

Appendix C: System Check

Appendix D: Calibration data

Appendix E: Antenna location

End of Report