



SAR EVALUATION REPORT

**FCC 47 CFR § 2.1093
IEEE Std 1528-2013**

For
Mobile Point of Sale Terminal

**FCC ID: B32V240MBW
Model Name: V240m BTWIFI**

**Report Number: 11972366-S1V2
Issue Date: 1/30/2018**

Prepared for
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NVLAP LAB CODE 200065-0

Revision History



Rev.	Date	Revisions	Revised By
V1	11/20/2017	Initial Issue	--
V2	1/30/2018	Section 6.1: Updated device dimensions Appendix A : Updated device dimensions	Coltyce Sanders

Table of Contents

1.	Attestation of Test Results	5
2.	Test Specification, Methods and Procedures.....	6
3.	Facilities and Accreditation	6
4.	SAR Measurement System & Test Equipment	7
4.1.	<i>SAR Measurement System.....</i>	<i>7</i>
4.2.	<i>SAR Scan Procedures.....</i>	<i>8</i>
4.3.	<i>Test Equipment.....</i>	<i>10</i>
5.	Measurement Uncertainty.....	10
6.	Device Under Test (DUT) Information	11
6.1.	<i>DUT Description</i>	<i>11</i>
6.2.	<i>Wireless Technologies.....</i>	<i>11</i>
6.3.	<i>Maximum Output Power from Tune-up Procedure.....</i>	<i>11</i>
6.4.	<i>Duty Cycle Factor Analysis</i>	<i>11</i>
7.	RF Exposure Conditions (Test Configurations).....	12
7.1.	<i>Standalone SAR Test Exclusion Considerations.....</i>	<i>12</i>
7.2.	<i>Required Test Configurations</i>	<i>12</i>
8.	Dielectric Property Measurements & System Check	13
8.1.	<i>Dielectric Property Measurements</i>	<i>13</i>
8.2.	<i>System Check.....</i>	<i>14</i>
9.	Conducted Output Power Measurements.....	15
9.1.	<i>Wi-Fi 2.4GHz (DTS Band)</i>	<i>15</i>
9.2.	<i>Bluetooth</i>	<i>15</i>
10.	Measured and Reported (Scaled) SAR Results.....	16
10.1.	<i>Wi-Fi 2.4GHz Measured SAR Results with Time Based Averaging Applied</i>	<i>17</i>
10.2.	<i>Bluetooth.....</i>	<i>17</i>
11.	SAR Measurement Variability.....	18
12.	Simultaneous Transmission SAR Analysis.....	18
Appendixes		19
	<i>11972366-S1V2 Appendix A: SAR Setup Photos.....</i>	<i>19</i>
	<i>11972366-S1V1 Appendix B: SAR System Check Plots.....</i>	<i>19</i>
	<i>11972366-S1V1 Appendix C: Highest SAR Test Plots</i>	<i>19</i>
	<i>11972366-S1V1 Appendix D: SAR Liquid Tissue Ingredients.....</i>	<i>19</i>

<i>11972366-S1V1 Appendix E: SAR Probe Calibration Certificates</i>	<i>19</i>
<i>11972366-S1V1 Appendix F: SAR Dipole Calibration Certificates.....</i>	<i>19</i>
<i>11972366-S1V1 Appendix G: Duty Cycle Analysis.....</i>	<i>19</i>

1. Attestation of Test Results

Applicant Name	Verifone Inc			
FCC ID	B32V240MBW			
Model Name	V240m BTWIFI			
Applicable Standards	FCC 47 CFR § 2.1093 Published RF exposure KDB procedures IEEE Std 1528-2013			
Exposure Category	SAR Limits (W/Kg)			
	Peak spatial-average(1g of tissue)		Extremities (hands, wrists, ankles, etc.) (10g of tissue)	
General population / Uncontrolled exposure	1.6		4	
RF Exposure Conditions	Equipment Class - Highest Reported SAR (W/kg)			
	PCB	DTS	NII	DSS
Extremity	N/A	0.879	N/A	N/A
Date Tested	10/10/2017 to 10/11/2017			
Test Results	Pass			
<p>UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by UL Verification Services Inc. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.</p> <p>Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government (NIST Handbook 150, Annex A). This report is written to support regulatory compliance of the applicable standards stated above.</p>				
Approved & Released By:		Prepared By:		
				
Dave Weaver Program Manager UL Verification Services Inc.		AJ Newcomer Laboratory Engineer UL Verification Services Inc.		

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure [KDB](#) procedures:

- 248227 D01 802.11 Wi-Fi SAR v02r02
- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

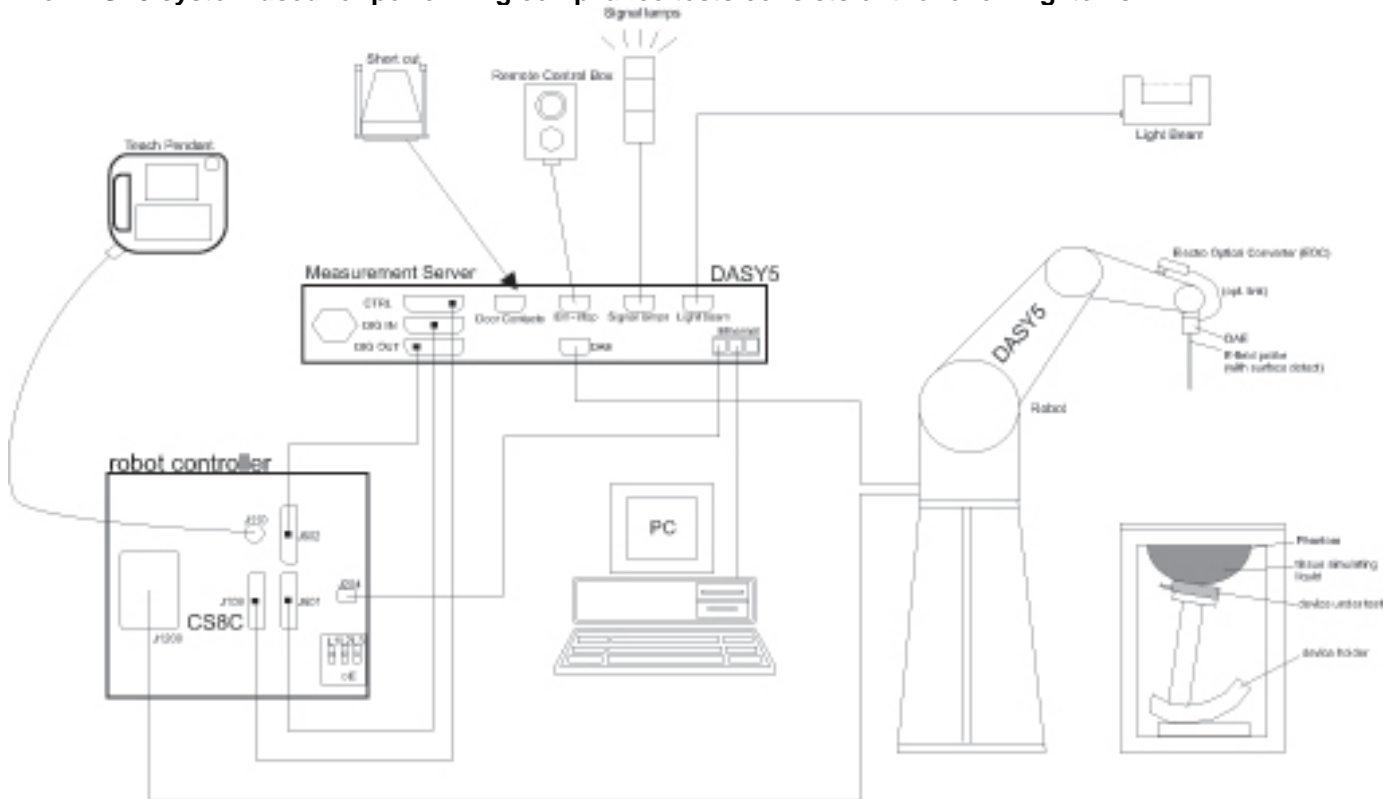
47173 Benicia Street	47266 Benicia Street
SAR Lab A	SAR Lab 1
SAR Lab B	SAR Lab 2
SAR Lab C	SAR Lab 3
SAR Lab D	SAR Lab 4
SAR Lab E	
SAR Lab F	
SAR Lab G	
SAR Lab H	

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

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

Step 3: Zoom Scan

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

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

		≤ 3 GHz	> 3 GHz	
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 4: Power drift measurement

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

Step 5: Z-Scan (FCC only)

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation the extrapolated distance should not be larger than the step size in Z-direction.

4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	Agilent	8753ES	MY40001647	9/15/2018
Dielectric Probe kit	SPEAG	DAK-3.5	1087	11/8/2017
Shorting block	SPEAG	DAK-3.5 Short	SM DAK 200 BA	11/8/2017
Thermometer	Traceable Calibration Control Co.	4242	170064398	1/30/2018

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthesized Signal Generator	Agilent	N5181A	MY50140610	5/31/2018
Power Meter	Agilent	N1912A	MY50001018	10/11/2017
Power Sensor	Agilent	N10149	MY53020038	8/13/2018
Power Sensor	Agilent	N1921A	MY52270022	12/17/2017
Amplifier	MITEQ	AMF-4D-00400600-50-30P	1795093	N/A
Directional coupler	Werlatone	C8060-102	2141	N/A
DC Power Supply	BK PRECISION	1611	21502292	N/A

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab G)	SPEAG	EX3DV4	3686	7/28/2018
Data Acquisition Electronics (SAR Lab G)	SPEAG	DAE4	1352	11/11/2017
System Validation Dipole	SPEAG	D2450V2	748	2/8/2018
Thermometer (SAR Lab E, F, G, H)	EXTECH	445703	NSN	6/13/2018

Other

Name of Equipment	Manufacturer	Type/Model	T Number	Serial No.	Cal. Due Date
Power Meter	Keysight	N1911A	T1244	MY55196008	5/12/2018
Power Sensor	Keysight	N1921A	T734	MY52200012	10/17/2017

5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

6. Device Under Test (DUT) Information

6.1. DUT Description

Device Dimension	Overall (Length x Width x Height): 162.9 mm x 75.3 mm x 53.4 mm Overall Diagonal: 140.32 mm Display Diagonal: 89.65 mm		
Back Cover	<input checked="" type="checkbox"/> Normal Battery Cover		
Battery Options	<input checked="" type="checkbox"/> Standard – Lithium-ion battery, Rating 3.7Vdc, 9.1Wh		
Test sample information	S/N	IMEI	Notes
	313-856-472	N/A	SAR Conducted unit
	313-856-448	N/A	SAR Radiated unit
Hardware Version	DVT 2		
Software Version	VOS2 30640XXX		

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating Mode	Duty Cycle used for SAR testing
Wi-Fi	2.4 GHz	802.11b 802.11g 802.11n (HT20)	100%
Bluetooth	2.4 GHz	Version 4.1 LE	N/A

6.3. Maximum Output Power from Tune-up Procedure

RF Air interface	Mode	Max. RF Output Power (dBm)
WiFi 2.4 GHz	802.11b	17.0
	802.11g	15.0
	802.11n HT20	13.0
Bluetooth	GFSK, EDR	8.0
	LE	8.0

6.4. Duty Cycle Factor Analysis

The duty cycle factor analysis was the subject of a KDB enquiry and accepted by the FCC. Refer to Appendix G for the specific details on maximum transaction time of the device.

7. RF Exposure Conditions (Test Configurations)

Refer to Appendix A for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

7.1. Standalone SAR Test Exclusion Considerations

Since the *Dedicated Host Approach* is applied, the standalone SAR test exclusion procedure in KDB 447498 § 4.3.1 is applied to determine the minimum test separation distance:

- When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.
- When the separation distance from the antenna to an adjacent edge is > 5 mm, the actual antenna-to-edge separation distance is applied to determine SAR test exclusion.

SAR Test Exclusion Calculations for WLAN

Antennas < 50mm to adjacent edges

Antenna	Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value							
			dBm	mW	Rear	Rear Slant	Edge 1	Edge 2	Edge 3	Edge 4	Front	Rear	Rear Slant	Edge 1	Edge 2	Edge 3	Edge 4	Front
WLAN	Wi-Fi 2.4 GHz	2462	17.00	50	5.00	5.00	152.63	58.21	3.30	4.00	10.00	15.7	15.7	> 50 mm	> 50 mm	15.7	15.7	7.8
	Bluetooth	2480	8.00	6	5.00	5.00	152.63	58.21	3.30	4.00	10.00	1.9	1.9	> 50 mm	> 50 mm	1.9	1.9	0.9
												-EXEMPT-	-EXEMPT-			-EXEMPT-	-EXEMPT-	-EXEMPT-

Note(s):

According to KDB 447498, if the calculated threshold value is >7.5 , then SAR testing is required.

Antennas > 50mm to adjacent edges

Antenna	Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value							
			dBm	mW	Rear	Rear Slant	Edge 1	Edge 2	Edge 3	Edge 4	Front	Rear	Rear Slant	Edge 1	Edge 2	Edge 3	Edge 4	Front
WLAN	Wi-Fi 2.4 GHz	2462	17.00	50	5.00	5.00	152.63	58.21	3.30	4.00	10.00	< 50 mm	< 50 mm	1121.9 mW	177.7 mW	< 50 mm	< 50 mm	< 50 mm
	Bluetooth	2480	8.00	6	5.00	5.00	152.63	58.21	3.30	4.00	10.00	< 50 mm	< 50 mm	1121.6 mW	177.4 mW	< 50 mm	< 50 mm	< 50 mm
												-EXEMPT-	-EXEMPT-	-EXEMPT-	-EXEMPT-			

Note(s):

According to KDB 447498, if the calculated Power threshold is less than the output power then SAR testing is required.

7.2. Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 7.1:

Antenna	Test Configurations	Rear	Rear Slant	Edge 1	Edge 2	Edge 3	Edge 4	Front
				(Top Edge)	(Right Edge)	(Bottom Edge)	(Left Edge)	
WLAN	Wi-Fi 2.4 GHz	Yes	Yes	No	No	Yes	Yes	Yes
	Bluetooth	No	No	No	No	No	No	No

Note(s):

Yes = Testing is required.

No = Testing is not required.

8. Dielectric Property Measurements & System Check

8.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within ± 2°C of the temperature when the tissue parameters are characterized.

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

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

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

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

SAR Lab	Date	Band (MHz)	Tissue Type	Frequency (MHz)	Relative Permittivity (ϵ_r)			Conductivity (σ)		
					Measured	Target	Delta (%)	Measured	Target	Delta (%)
G	10/10/2017	2450	Body	2450	51.00	52.70	-3.23	1.95	1.95	-0.10
				2400	51.15	52.77	-3.07	1.88	1.90	-0.74
				2480	50.89	52.66	-3.37	1.99	1.99	-0.16

8.2. System Check

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

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±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 ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

System Check Results

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

SAR Lab	Date	Tissue Type	Dipole Type _Serial #	Dipole Cal. Due Data	Measured Results for 1g SAR				Measured Results for 10g SAR				Plot No.
					Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	
G	10/10/2017	Body	D2450V2 SN:748	2/8/2018	5.250	52.50	51.30	2.34	2.400	24.00	23.90	0.42	1,2

9. Conducted Output Power Measurements

9.1. Wi-Fi 2.4GHz (DTS Band)

Measured Results

Band (GHz)	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)	Max Output Power (dBm)	SAR Test (Yes/No)
2.4	802.11b	1 Mbps	1	2412	16.9	17.0	Yes
			6	2437	16.8		
			11	2462	16.9		
	802.11g	6 Mbps	1	2412	Not Required	15.0	No
			6	2437			
			11	2462			
	802.11n (HT20)	6.5 Mbps	1	2412	Not Required	13.0	No
			6	2437			
			11	2462			

Note(s):

- SAR not required for 802.11g/n modes when the adjusted SAR for 802.11b is < 3.0 W/kg (10-g Extremity).

9.2. Bluetooth

Maximum tune-up tolerance limit is 8.00 dBm. This power level qualifies for exclusion of SAR testing. Refer to §7.1 for Standalone SAR Test Exclusion Considerations.

10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

KDB 447498 D01 General RF Exposure Guidance:

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

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

KDB 248227 D01 SAR guidance for 802.11:

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

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

- ≤ 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 closest/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.
 - 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.
- 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.

10.1. Wi-Fi 2.4GHz Measured SAR Results with Time Based Averaging Applied

Frequency Band	Mode	RF Exposure	Dist. (mm)	Test Position	Ch #.	Freq. (MHz)	Power (dBm)		10-g SAR (W/kg)		Duty Cycle	Final Reported SAR	Plot No.
							Tune-up limit	Meas.	Meas.	Scaled			
2.4GHz	802.11b 1 Mbps	Extremity	0	Rear	11	2462.0	17.0	16.9	0.642	0.657	68.75%	0.452	
				Rear Slant	11	2462.0	17.0	16.9	1.250	1.279	68.75%	0.879	1
				Front	11	2462.0	17.0	16.9	0.118	0.121	68.75%	0.083	
				Edge 3	11	2462.0	17.0	16.9	0.557	0.570	68.75%	0.392	
				Edge 4	11	2462.0	17.0	16.9	0.568	0.581	68.75%	0.400	

Note(s):

A Duty Cycle of 68.75% was used to determine Final Reported SAR with Time Based Average

10.2. Bluetooth

Maximum tune-up tolerance limit is 8.00 dBm. This power level qualifies for exclusion of SAR testing. Refer to §7.1 for Standalone SAR Test Exclusion Considerations.

11. SAR Measurement Variability

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

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

Frequency Band (MHz)	Air Interface	RF Exposure Conditions	Test Position	Repeated SAR (Yes/No)	Highest Measured SAR (W/kg)
2400	Wi-Fi 802.11b/g/n	Extremity	Rear Slant	No	1.250

Note(s):

Repeated measurement not required since measured SAR is < 2.0 W/kg.

12. Simultaneous Transmission SAR Analysis

This device does not support Simultaneous Transmission.

Appendixes

Refer to separated files for the following appendixes.

11972366-S1V2 Appendix A: SAR Setup Photos

11972366-S1V1 Appendix B: SAR System Check Plots

11972366-S1V1 Appendix C: Highest SAR Test Plots

11972366-S1V1 Appendix D: SAR Liquid Tissue Ingredients

11972366-S1V1 Appendix E: SAR Probe Calibration Certificates

11972366-S1V1 Appendix F: SAR Dipole Calibration Certificates

11972366-S1V1 Appendix G: Duty Cycle Analysis

END OF REPORT