



SAR EVALUATION REPORT

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

**For
Bluetooth Headset**

FCC ID: BCE-OTE180

Model: OTE180L, OTE180R

Report Number: 4790716111-SAR-1

Issue Date: Mar 10, 2023

Prepared for

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Revision History

Rev.	Date	Revisions	Revised By
V1.0	Mar 10, 2023	Initial Issue	\

Note:

1. The Measurement result for the sample received is<Pass> according to < IEEE Std. 1528-2013> when <Accuracy Method> decision rule is applied.
2. This report is only published to and used by the applicant, and it is not for evidence purpose in China.



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1. Attestation of Test Results

Applicant Name	GN Audio USA Inc.	
Address	900 Chelmsfort St, Tower 2, Floor 8 Lowell, Massachusetts United States 01851	
Manufacturer	GN Audio A/S	
Address	Lautrupbjerg 7, 2570 Ballerup, Denmark	
EUT Name	Bluetooth Headset	
Model	OTE180L,OTE180R	
Sample Status	Normal	
Sample Received Date	Mar 1, 2023	
Date of Tested	Mar 6, 2023	
Applicable Standards	FCC 47 CFR § 2.1093 IEEE Std. 1528-2013 KDB publication	
SAR Limits (W/Kg)		
Exposure Category	Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)
General population / Uncontrolled exposure	1.6	4
The Highest Reported SAR (W/kg)		
RF Exposure Conditions	Equipment Class	
	DSS	
	L ear	R ear
Head (1-g)	0.672	0.662
Simultaneous Transmission (1-g)	1.209	
Test Results	Pass	
Prepared By: <i>Burt Hu</i> Burt Hu Laboratory Engineer	Reviewed By: <i>Denny Huang</i> Denny Huang Senior Project Engineer	Approved By: <i>Stephen Guo</i> Stephen Guo Laboratory Manager



2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with IEEE Std.1528-2013, the following FCC Published RF exposure KDB procedures:

- 447498 D01 General RF Exposure Guidance v06
- 690783 D01 SAR Listings on Grants v01r03
- 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02



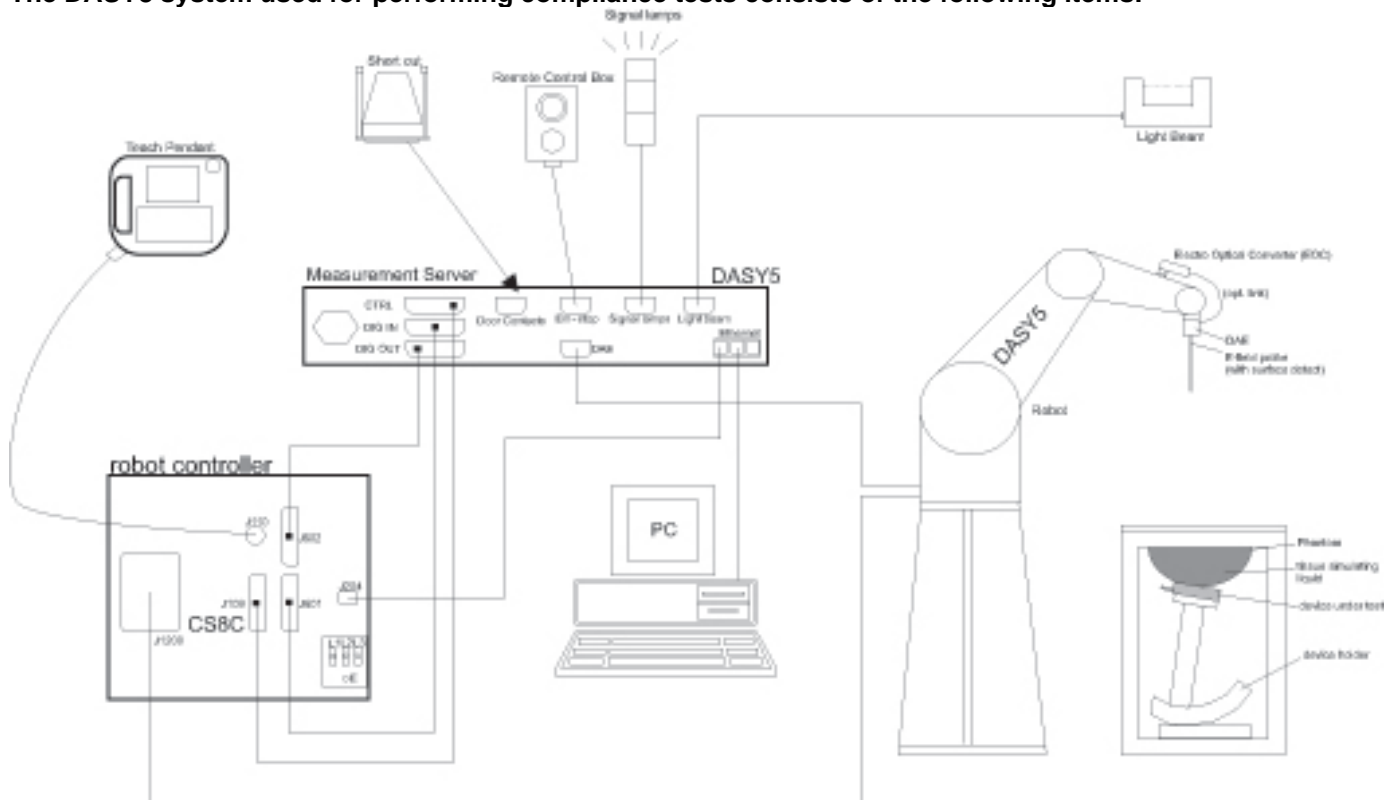
3. Facilities and Accreditation

Test Location	UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch.
Address	Building 10, Innovation Technology Park, Song Shan Lake Hi-tech Development Zone, Dongguan, 523808, China
Accreditation Certificate	<p>A2LA (Certificate No.: 4102.01) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with A2LA.</p> <p>FCC (FCC Recognized No.: CN1187) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been recognized to perform compliance testing on equipment subject to the Commission's Declaration of Conformity (DoC) and Certification rules</p> <p>ISED (Company No.: 21320) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. has been registered and fully described in a report filed with ISED. The Company Number is 21320 and the test lab Conformity Assessment Body Identifier (CABID) is CN0046.</p> <p>VCCI (Registration No.: G-20019, R-20004, C-20012 and T-20011) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with VCCI, the Membership No. is 3793. Facility Name: Chamber D, the VCCI registration No. is G-20019 and R-20004 Shielding Room B, the VCCI registration No. is C-20012 and T-20011</p>
Description	All measurement facilities use to collect the measurement data are located at Building 10, Innovation Technology Park, Song Shan Lake Hi tech Development Zone, Dongguan, 523808, China

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

The DASY8 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 Win10 and the DASY8 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 v01r04 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 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: 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 ≤ 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 v01r04 SAR Measurement 100 MHz to 6 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	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

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 greater 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.

Name of equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
ENA Network Analyzer	Keysight	E5080A	MY55100583	2023.10.16
Dielectric Probe kit	SPEAG	SM DAK 040 SA	1155	2025.02.27
DC power supply	Keysight	E36103A	MY55350020	2023.10.16
Signal Generator	Rohde & Schwarz	SME06	837633\001	2023.08.14
BI-Directional Coupler	KRYTAR	1850	54733	2023.10.16
Peak and Average Power Sensor	Keysight	E9325A	MY62220002	2023.10.25
Peak and Average Power Sensor	Keysight	E9325A	MY62220003	2023.10.25
Dual Channel PK Power Meter	Keysight	N1912A	MY55416024	2023.10.16
Amplifier	CORAD TECHNOLOGY LTD	AMF-4D-00400600-50-30P	1983561	NCR
Dosimetric E-Field Probe	SPEAG	EX3DV4	7733	2023.08.01
Data Acquisition Electronic	SPEAG	DAE4	1739	2023.07.28
Dipole Kit 2450 MHz	SPEAG	D2450V2	977	2024.12.16
Software	SPEAG	DASY8	N/A	NCR
ELI Phantom	SPEAG	ELI V8.0	2178	NCR
Thermometer	/	GX-138	150709653	2023.10.21
Thermometer	VICTOR	ITHX-SD-5	18470005	2023.10.21

Note:

- 1) As per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
 - a) There is no physical damage on the dipole;
 - b) System check with specific dipole is within 10% of calibrated value;
 - c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement.
 - d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.
- 2) Dielectric assessment kit is calibrated against air, distilled water and a shorting block performed before measuring liquid parameters.
- 3) NCR is short for "No Calibration Requirement".



5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std. 1528-2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.



6. Device Under Test (DUT) Information

6.1. DUT Description

The DUT is an In-ear headphones with 2.4 GHz Bluetooth radio	
DUT Dimension	Overall (Length x Width x Height): 26.5mm x 21.2mm x 17.9mm

6.2. Wireless Technology

Wireless technology	Frequency band
Bluetooth	2.4 GHz

6.3. Antenna Gain

Antenna type	Band	Gain(dBi)
LDS antenna (L ear)	2.4 GHz	-2.33
LDS antenna (R ear)	2.4 GHz	-2.08



7. Conducted Output Power Measurement and tune-up tolerance

7.1. Power measurement result of BT

L ear						
Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2441MHz	2480MHz		
Classic	DH5	15.04	15.12	15.09	15.5	76.8
	3DH5	Not Required			12.5	/
Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2440MHz	2480MHz		
BLE	1M	Not Required			6.0	/
BLE	2M	Not Required			6.0	/

R ear						
Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2441MHz	2480MHz		
Classic	DH5	15.01	15.16	14.87	15.5	76.8
	3DH5	Not Required			12.5	/
Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2440MHz	2480MHz		
BLE	1M	Not Required			6.0	/
BLE	2M	Not Required			6.0	/

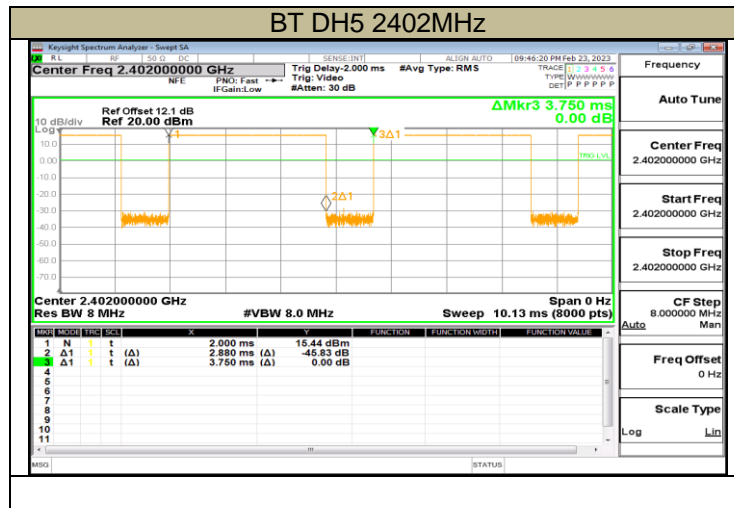
Note:

- 1) The output power of the device was set to transmit at maximum power for all tests.
- 2) The maximum output power mode DH5 was selected as the primary mode to test SAR for Bluetooth mode. SAR measurement is not required for the other modes, when the secondary mode is ≤ 0.25 dB higher than the primary mode.



7.2. Duty Cycle

Test Mode	On Time (msec)	Period (msec)	Duty Cycle x (Linear)	Duty Cycle (%)
BT DH5	2.88	3.75	0.7680	76.80

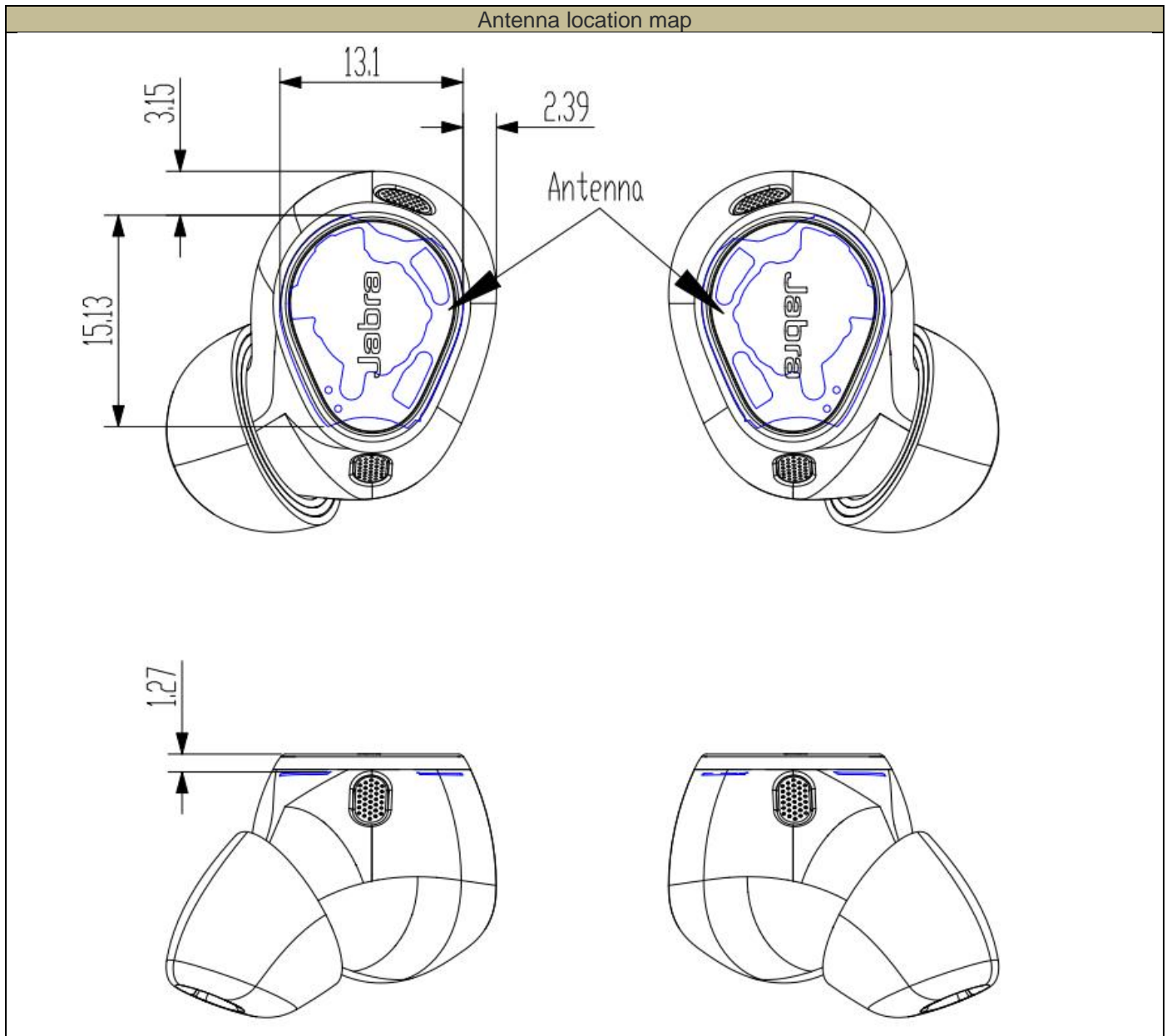


8. RF Exposure Conditions

8.1. Exemption Limits for Routine Evaluation

As per KDB 447498 D01 v06 sec.4.3.1,a), SAR evaluation for Bluetooth is required.

Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Calculation Result	Threshold	SAR Test
2480	16.00	39.81	5.00	12.5	3.0	Required





9. SAR Test Configuration

The EUT is an In-ear headphones, and it may extreme close to the human's head when used, so 1-g head SAR(0mm) evaluation is considered.



10. Dielectric Property Measurements & System Check

10.1. 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.

Tissue Dielectric Parameters

FCC KDB 865664 D01 v01r04 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:

Liquid	Freq.	Liquid Parameters				Deviation(%)		Limit (%)	Temp. (°C)	Test Date
		Measured		Target		ϵ_r	σ			
		ϵ_r	σ	ϵ_r	σ					
Head 2450	2360	40.00	1.66	39.36	1.72	1.63	-3.49	±5	22.8	2023.3.6
	2450	39.90	1.77	39.20	1.80	1.79	-1.67			
	2540	39.40	1.87	39.09	1.90	0.79	-1.58			



10.2. 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 10mm (above 1GHz) and 15mm (below 1GHz) from dipole center to the simulating liquid surface.
- For area scan, standard grid spacing for head measurements is 15 mm in x- and y- dimension(≤2GHz), 12 mm in x- and y-dimension (2-4 GHz) and 10mm in x- and y- dimension(4-6GHz).
- For zoom scan, ΔX_{zoom} , $\Delta Y_{zoom} \leq 2\text{GHz} - \leq 8\text{mm}$, 2-4GHz - $\leq 5\text{ mm}$ and 4-6 GHz- $\leq 4\text{ mm}$; $\Delta Z_{zoom} \leq 3\text{GHz} - \leq 5\text{ mm}$, 3-4 GHz- $\leq 4\text{ mm}$ and 4-6 GHz- $\leq 2\text{ mm}$.
- Distance between probe sensors and phantom surface was set to 3 mm except for 5 GHz band. For 5GHz band, Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was set to 100 mW or 250 mW depend on the certificate of the dipoles.
- 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.

T.S. Liquid	Measured Results		Target (Ref. value)	Delta (%)	Limit (%)	Temp. (°C)	Test Date
	Zoom Scan (W/Kg)	Normalize to 1W (W/Kg)					
Head 2450	1-g	13.200	52.80	-0.75	±10	22.8	2023.3.6
	10-g	6.390	25.56	24.20			



11. Measured and Reported (Scaled) SAR Results

As per KDB 447498 D01 v06 sec.4.1.e), When SAR or MPE is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported.

Scaled SAR calculation formula:

Scaled SAR = Tune-up in mW / Conducted power in mW * Duty cycle (if available) * SAR value

SAR Test Reduction criteria are as follows:

KDB 447498 D01 v06 General RF Exposure Guidance:

A) Per KDB447498 D01 v06, all SAR measurement results are scaled to the maximum tune-up tolerance limit to demonstrate SAR compliance.

B) 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.

Per KDB865664 D01 v01r04:

For each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/Kg; if the deviation among the repeated measurement is $\leq 20\%$, and the measured SAR < 1.45 W/Kg, only one repeated measurement is required.

When the highest reported SAR for the initial test configuration, according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.



11.1. SAR Test Results

Scenario and Distance (Head 0mm)	Test Mode	Frequency	Power (dBm)		SAR Value	Power Drift	Duty Factor (%)	Scaled (W/Kg)
			Tune-up	Meas.	1-g (W/kg)			
L ear								
Cochlea Side	BT DH5	39/2441	15.5	15.12	0.150	0.02	76.80	0.213
Back Side	BT DH5	39/2441	15.5	15.12	0.240	-0.03	76.80	0.341
Left Side	BT DH5	39/2441	15.5	15.12	0.473	-0.05	76.80	0.672
Right Side	BT DH5	39/2441	15.5	15.12	0.385	-0.09	76.80	0.547
Top Side	BT DH5	39/2441	15.5	15.12	0.047	-0.06	76.80	0.067
Bottom Side	BT DH5	39/2441	15.5	15.12	0.247	-0.03	76.80	0.351
R ear								
Cochlea Side	BT DH5	39/2441	15.5	15.16	0.100	0.02	76.80	0.141
Back Side	BT DH5	39/2441	15.5	15.16	0.377	0.01	76.80	0.531
Left Side	BT DH5	39/2441	15.5	15.16	0.152	-0.01	76.80	0.214
Right Side	BT DH5	39/2441	15.5	15.16	0.470	0.03	76.80	0.662
Top Side	BT DH5	39/2441	15.5	15.16	0.183	-0.05	76.80	0.258
Bottom Side	BT DH5	39/2441	15.5	15.16	0.307	-0.04	76.80	0.432

Note:

The SAR testing was set to transmit at maximum power for all tests.



12. Simultaneous Transmission SAR Analysis

The EUT contains a individual antenna in each unit, and may transmit simultaneously, so the simultaneous transmission analysis should be considered.

Simultaneous Transmission Combination Head				
Test Position	L ear	R ear	Σ SAR 1-g (W/kg)	Limit (W/kg)
Cochlea Side	0.213	0.141	0.354	1.6
Back Side	0.341	0.531	0.872	
Left Side	0.672	0.214	0.886	
Right Side	0.547	0.662	1.209	
Top Side	0.067	0.258	0.325	
Bottom Side	0.351	0.432	0.783	



Appendixes

Refer to separated files for the following appendixes.

4790716111-SAR-1_App A Photo

4790716111-SAR-1_App B System Check Plots

4790716111-SAR-1_App C Highest Test Plots

4790716111-SAR-1_App D Cal. Certificates

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