



**SAR EVALUATION REPORT**

**IEEE Std 1528-2013**

*For*  
**SMARTPHONE**

**FCC ID: BCG-E8685A, BCG-E8686A, BCG-E8687A**

**Model Name: A3295, A3296, A3297**

**Report Number: 14982480-S1V1**

**Issue Date: 8/2/2024**

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**Revision History**

Rev.	Date	Revisions	Revised By
V1	8/2/2024	Initial Issue	

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# 1. Attestation of Test Results

Applicant Name		APPLE INC.							
FCC ID		BCG-E8685A, BCG-E8686A, BCG-E8687A							
Model Name		A3295, A3296, A3297							
Applicable Standards		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)							
		TNE	PCE	CBE	DTS	NII	6CD	DSS	DXX
Worst Case from <b>BCG-E8684A</b> (A3084)	1g	0.976	0.988	0.968	1.084	1.149	0.486	0.607	N/A
	10g	1.939	N/A	N/A	N/A	N/A	0.486	N/A	0.007
Variant Models		Worst-Case SAR for Variant Models							
<b>BCG-E8685A</b> (A3295)	1g	0.841	0.822	0.640	1.029	0.817	0.500	0.589	N/A
	10g	1.640	N/A	N/A	N/A	N/A	0.115	N/A	0.007
<b>BCG-E8686A</b> (A3296)	1g	0.870	0.672	0.692	1.011	0.796	0.391	0.590	N/A
	10g	1.780	N/A	N/A	N/A	N/A	0.089	N/A	0.007
<b>BCG-E8687A</b> (A3297)	1g	N/A	0.792	0.819	0.942	0.885	0.482	0.524	N/A
	10g	N/A	N/A	N/A	N/A	N/A	0.109	N/A	0.000
Exposure Category		Radiofrequency (RF) Radiation Exposure (above 6GHz)							
		Uncontrol (mW/cm <sup>2</sup> over 4 cm <sup>2</sup> ) 30 min average				Occupational/controlled (mW/cm <sup>2</sup> over 4 cm <sup>2</sup> ) 6 min average			
General population / Uncontrolled exposure		1.0				5			
Worst Case from <b>BCG-E8684A</b> (A3084)		0.694							
Variant Models		Worst-Case SAR for Variant Models							
<b>BCG-E8685A</b> (A3295) PD Result		0.698							
<b>BCG-E8686A</b> (A3296) PD Result		0.669							
<b>BCG-E8687A</b> (A3297) PD Result		0.636							
Date Tested		7/16/2024 to 7/30/2024							
Test Results		Pass							
<p>This application for certification is leveraging the data reuse procedure from TCB workshop April 2021; RF Exposure Procedures (Remarks on Test Reductions via Data Referencing for Closely Related Products) based on reference FCC ID: <b>BCG-E8684A</b> (UL report# 14982479-S1) to cover variants FCC ID: <b>BCG-E8685A, BCG-E8686A and BCG-E8687A</b>. The major difference between the reference model and the variant models is the depopulation of FR2 (mmWave) ANT and that support for some LTE/5G NR bands and MSS is disabled via software in the variant models. All other circuitry and features are identical. The data reuse test plan was approved via manufacturer KDB inquiry.</p> <p>UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested can demonstrate compliance with the requirements as documented in this report.</p> <p>This report contains data provided by the customer which can impact the validity of results. UL Verification Services Inc. is only responsible for the validity of results after the integration of the data provided by the customer.</p> <p>The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not considered unless noted otherwise.</p> <p>This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are 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 A2LA, NIST, any agency of the Federal Government, or any agency of the U.S. government.</p>									
Approved & Released By:					Prepared By:				
									
Devin Chang Senior Test Engineer UL Verification Services Inc.					Truc Tran 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:

### SAR

- 248227 D01 802.11 Wi-Fi SAR v02r02
- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 484596 D01 Referencing Test Data v02r03
- 648474 D04 Handset SAR v01r03
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02
- 941225 D01 3G SAR Procedures v03r01
- 941225 D05 SAR for LTE Devices v02r05
- 941225 D05A LTE Rel.10 KDB Inquiry Sheet v01r02
- 941225 D06 Hotspot Mode v02r01

In addition to the above, the following information was used:

- **TCB workshop** October 2014; RF Exposure Procedures (Other LTE Considerations)
- **TCB workshop** April 2015; RF Exposure Procedures (Overlapping LTE Bands)
- **TCB workshop** October 2015; RF Exposure Procedures (KDB 941225 D05A)
- **TCB workshop** April 2016; RF Exposure Procedures (LTE Carrier Aggregation for DL)
- **TCB workshop** October 2016; RF Exposure Procedures (LTE Carrier Aggregation for UL)
- **TCB workshop** October 2016; RF Exposure Procedures (Bluetooth Duty Factor)
- **TCB workshop** October 2016; RF Exposure Procedures (DUT Holder Perturbations)
- **TCB workshop** May 2017; RF Exposure Procedures (Broadband Liquid Above 3 GHz)
- **TCB workshop** May 2017; RF Exposure Procedures (LTE Band 41 Power Class 2)
- **TCB workshop** November 2017; RF Exposure Procedures (LTE UL/DL Carrier Aggregation SAR)
- **TCB workshop** April 2018; RF Exposure Procedures (LTE DL CA SAR Test Exclusion)
- **TCB workshop** October 2018; RF Exposure Procedures (LTE Inter-Band Uplink Carrier Aggregation – Interim Procedures)
- **TCB workshop** April 2019; RF Exposure Procedures (802.11ax SAR Testing)
- **TCB workshop** November 2019; RF Exposure Policy Updates (5G NR FR1 NSA EN-DCUE SAR Evaluations)
- **TCB workshop** October 2020; 5G and RF Exposure Procedures (U-NII 6-7 GHz SAR Testing)
- **TCB workshop** April 2021; RF Exposure Procedures (Remarks on Test Reductions via Data Referencing for Closely Related Products)
- **TCB workshop** April 2022; RF Exposure Procedures (Sum-Peak Location Separation Ratio)

**PD**

- 447498 D01 General RF Exposure Guidance v06
- 865664 D02 RF Exposure Reporting v01r02
- 388624 D02 Pre-Approval Guidance List v18r05
- 248227 D01 802.11 Wi-Fi SAR v02r02
- SPEAG DASY8 System Handbook; part 4 DASY8 Module mmWave
- SPEAG DASY8 Application Note: SAR, APD & PD at 6 – 10 GHz (Version 5), April 2022
- IEC/IEEE 63195-1:2022 Assessment of power density of human exposure to radio frequency fields from wireless devices in close proximity to the head and body (frequency range of 6 GHz to 300 GHz) - Part 1: Measurement procedure
- [TCB workshop](#) November 2017; RF Exposure Procedures (Power Density Evaluation)
- [TCB workshop](#) October 2018; RF Exposure Procedures (Millimeter Wave Assessment)
- [TCB workshop](#) April 2019; RF Exposure Procedures (Millimeter Wave RF Exposure Evaluation)
- [TCB workshop](#) November 2019; RF Exposure Procedures (Millimeter Wave Scan Requirements)
- [TCB workshop](#) October 2020; RF Exposure Procedures (U NII 6-7 GHz RF Exposure)
- [TCB workshop](#) October 2022; RF Exposure Policies and Procedures (f-above-6 GHz Portable Devices)

**3. Facilities and Accreditation**

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

47173 Benicia Street	47266 Benicia Street
SAR Labs A to I	SAR Labs 1 to 19

UL Verification Services Inc. is accredited by A2LA, Certificate Number 0751.05

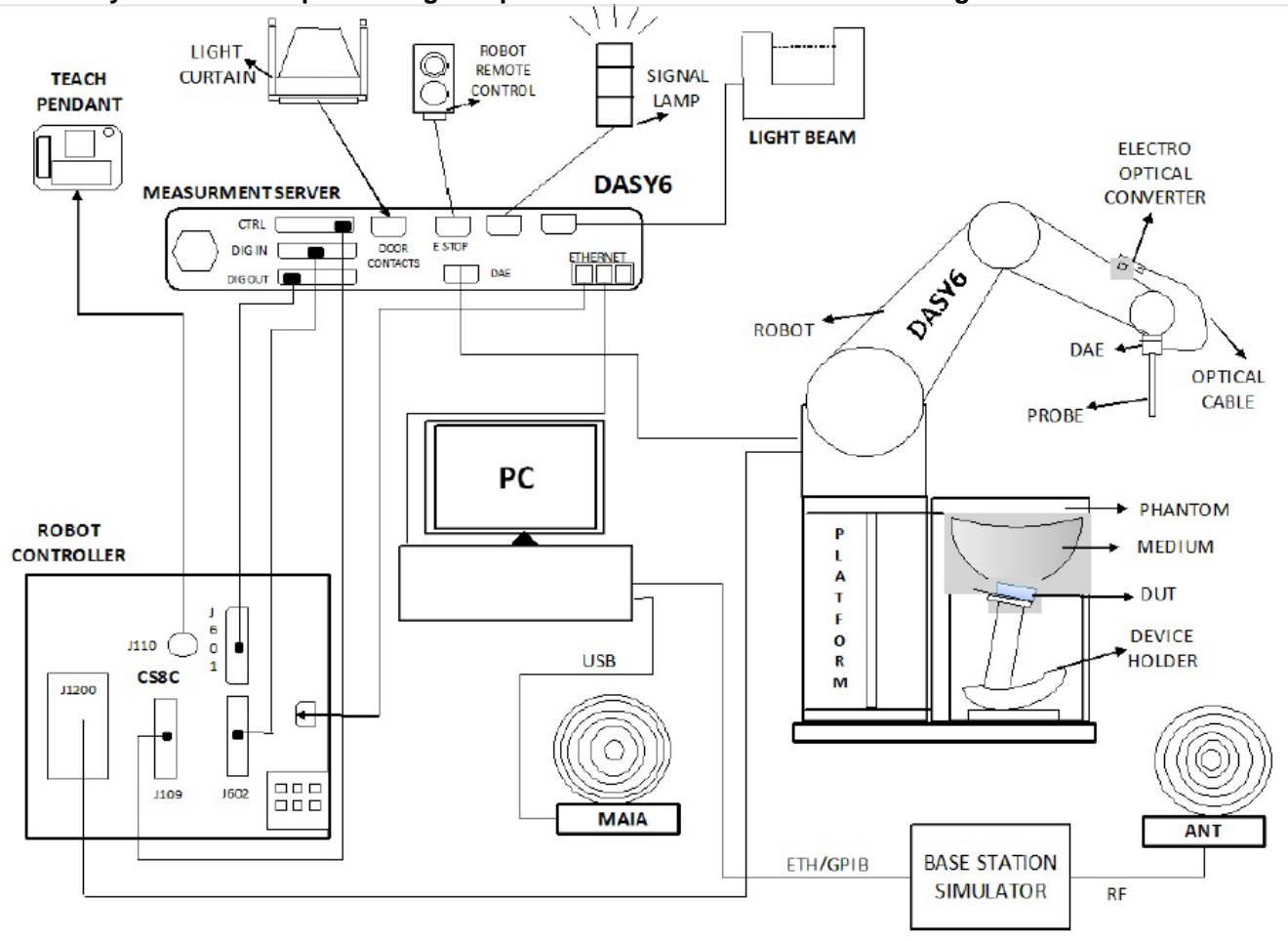
The Test Lab Conformity Assessment Body Identifier (CABID)

Location	CABID	Company Number
47173 Benicia Street, Fremont, CA, 94538 UNITED STATES	US0104	2324A
47266 Benicia Street, Fremont, CA, 94538 UNITED STATES		

## 4. SAR Measurement System & Test Equipment

### 4.1. SAR Measurement System

The DASY 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 DASY6/8<sup>1</sup> 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.

<sup>1</sup> DASY6/8 software used: DASY6.16.2 or DASY8.16.2 and older generations.

## 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 IEC/IEEE 62209-1528, 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° ± 1°	20° ± 1°
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	≤ 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 SAR Measurement 100 MHz to 6 GHz

		$\leq 3$ GHz	$> 3$ GHz	
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}, \Delta y_{Zoom}$		$\leq 2$ GHz: $\leq 8$ mm 2 – 3 GHz: $\leq 5$ mm*	3 – 4 GHz: $\leq 5$ mm* 4 – 6 GHz: $\leq 4$ mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	$\leq 5$ mm	3 – 4 GHz: $\leq 4$ mm 4 – 5 GHz: $\leq 3$ mm 5 – 6 GHz: $\leq 2$ mm	
	graded grid	$\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4$ mm	3 – 4 GHz: $\leq 3$ mm 4 – 5 GHz: $\leq 2.5$ mm 5 – 6 GHz: $\leq 2$ 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	$\geq 30$ mm	3 – 4 GHz: $\geq 28$ mm 4 – 5 GHz: $\geq 25$ mm 5 – 6 GHz: $\geq 22$ mm	
Note: $\delta$ 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 $\leq 1.4$ W/kg, $\leq 8$ mm, $\leq 7$ mm and $\leq 5$ 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.

## 4.3. PD Measurement Procedures

### 4.3.1. System Verification Scan Procedures

DASY8 Module mmWave supports “5G Scan”, a fine resolution scan performed on two different planes which is used to reconstruct the E- and H-fields as well as the power density; the average power density is derived from this measurement.

#### 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 device under test.

#### Step 2: 5G Scan

The steps in the X, Y, and Z directions are specified in terms of fractions of the signal wavelength, lambda. Area Scan Parameters extracted from SPEAG DASY8 System Handbook; part 4 DASY8 Module mmWave.

#### Recommended settings for measurement of verification sources

Frequency [GHz]	Grid step	Grid extent X/Y [mm]	Measurement points
10	0.125 $\left(\frac{\lambda}{8}\right)$	60/60	18×18
30	0.25 $\left(\frac{\lambda}{4}\right)$	60/60	26×26
45	0.25 $\left(\frac{\lambda}{4}\right)$	42/42	28×28
60	0.25 $\left(\frac{\lambda}{4}\right)$	32.5/32.5	28×28
90	0.25 $\left(\frac{\lambda}{4}\right)$	30/30	38×38

The minimum distance of probe sensors to the verification source surface, horn antenna, is 10 mm for 10 GHz and 5.55mm for 30 GHz and above.

#### Step 3: 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.

When the drift is larger than  $\pm 5\%$ , test is repeated from step1.

### 4.3.2. Scan Procedures

#### Step 1: Power Reference Measurement

Same as System Verification Scan Procedures step 1.

#### Step 2: 5G Scan

Same as System Verification Scan Procedures step 2. But measurement area is defined based on TCB workshop April 2019, “A sufficiently large measurement region and proper measurement spatial resolution are required to maintain field reconstruction accuracy”.

–Fields at the measurement region boundary should be ~20-30 dB below the peaks

#### Step 3: Power drift measurement

Same as System Verification Scan Procedures step 3.

When the drift is smaller than  $\pm 5\%$ , it is considered in the uncertainty budget if drifts larger than 5%, uncertainty is re-calculated.

## 4.4. 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.

### SAR

#### Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Vector Network Analyzer	ROHDE & SCHWARZ	ZNLE6	101274-mn	2/28/2025
Vector Network Analyzer	ROHDE & SCHWARZ	ZNLE6	101273-va	2/28/2025
Vector Network Analyzer	Copper Mountain Tech	R140N	21130078	2/28/2025
Dielectric Probe kit	SPEAG	DAK-3.5	1087	11/1/2024
Dielectric Probe kit	SPEAG	DAK-3.5	1082	4/15/2025
Dielectric Probe kit	SPEAG	DAK-3.5	1103	2/12/2025
Dielectric Probe kit	SPEAG	DAK-12	1128	1/16/2025
Shorting Block	SPEAG	DAK-1.2/3.5 Short	SM DAK 200 DA	11/1/2024
Shorting Block	SPEAG	DAK-12 Short	SM DAK 220 AC	1/16/2025
Thermometer	Fisher Scientific	Traceable	122529162	1/31/2025

#### System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
MXG Analog Signal Generator	Agilent	N5181A	MY50140610	1/31/2025
Power Meter	Keysight	N1911A	MY55196014	1/31/2025
Power Sensor	Agilent	N1921A	MY52270022	1/31/2025
Power Sensor	Agilent	N1921A	MY552260009	1/31/2025
Bi-directional coupler	Werlatone	C8060-102	4062	N/A
DC Power Supply	Sorensen	XT 15-4	1802A01877	N/A
Signal Generator	R&S	SMB 100A	180969-yC	2/21/2025
Power Meter	Keysight	N1912A	MY55196008	1/31/2025
Power Sensor	Agilent	N1912A	MY53260001	1/31/2025
Power Sensor	Agilent	N1912A	MY52200012	1/31/2025
Bi-directional coupler	Mini-Circuits	ZJDC10-183+	1722	N/A
Signal Generator	R&S	SMB 100A	180968-gX	2/16/2025
Power Sensor	R&S	NRP18A	100995-hs	2/28/2025
Power Meter	Keysight	N1912A	MY50001018	2/28/2025
Power Sensor	Agilent	N1912A	MY53260010	2/28/2025
Bi-directional coupler	Werlatone	C8060-102	2149	N/A
Signal Generator	R&S	SMB 100A	180970-zC	2/28/2025
Power Sensor	R&S	NRP18A	100992-iu	2/28/2025
Power Meter	HP	437B	3125U12345	1/31/2025
Power Sensor	HP	8481A	2237A31744	1/31/2025
Bi-directional coupler	Werlatone	C8060-102	2710	N/A
MXG Analog Signal Generator	Agilent	N5181A	MY50140630	1/31/2025
Power Meter	Agilent	N1913A	MY53100006	1/31/2025
Power Meter	HP	437B	3125U11364	1/31/2025
Power Sensor	HP	8481A	3318A92374	1/31/2025
Power Sensor	HP	8487A	3318A03287	1/31/2025
Bi-directional coupler	Werlatone	C8060-102	4063	N/A

**Lab Equipment**

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab G)	SPEAG	EX3DV4	3991	10/12/2024
E-Field Probe (SAR Lab I)	SPEAG	EX3DV4	7335	1/9/2025
E-Field Probe (SAR Lab 1)	SPEAG	EX3DV4	3772	2/7/2025
E-Field Probe (SAR Lab 4)	SPEAG	EX3DV4	7820	5/10/2025
E-Field Probe (SAR Lab 6)	SPEAG	EX3DV4	7587	4/15/2025
E-Field Probe (SAR Lab 7)	SPEAG	EX3DV4	7501	3/14/2025
E-Field Probe (SAR Lab 9)	SPEAG	EX3DV4	3902	3/12/2025
E-Field Probe (SAR Lab 12)	SPEAG	EX3DV4	3989	1/9/2025
E-Field Probe (SAR Lab 18)	SPEAG	EX3DV4	7709	11/30/2024
Data Acquisition Electronics (SAR Lab G)	SPEAG	DAE4	1380	2/9/2025
Data Acquisition Electronics (SAR Lab I)	SPEAG	DAE4ip	1619	4/11/2025
Data Acquisition Electronics (SAR Lab 1)	SPEAG	DAE4	1258	3/12/2025
Data Acquisition Electronics (SAR Lab 4)	SPEAG	DAE4	1544	1/16/2025
Data Acquisition Electronics (SAR Lab 6)	SPEAG	DAE4	1797	5/2/2025
Data Acquisition Electronics (SAR Lab 7)	SPEAG	DAE4	1357	1/9/2025
Data Acquisition Electronics (SAR Lab 9)	SPEAG	DAE4	1799	4/4/2025
Data Acquisition Electronics (SAR Lab 12)	SPEAG	DAE4	1433	2/8/2025
Data Acquisition Electronics (SAR Lab 18)	SPEAG	DAE4	1714	11/22/2024
Thermometer	TRACEABLE	6530CC	181175331	1/31/2025
Thermometer	TRACEABLE	6530CC	181073773	1/31/2025
Thermometer	TRACEABLE	6530CC	181062309	1/31/2025
Thermometer	TRACEABLE	6530CC	160643192	1/31/2025
System Validation Dipole**	SPEAG	D1640V2	324	6/13/2025
System Validation Dipole	SPEAG	D1750V2	1053	10/13/2024
System Validation Dipole**	SPEAG	D2450V2	706	1/20/2025
System Validation Dipole*	SPEAG	D2450V2	748	2/8/2025
System Validation Dipole**	SPEAG	D3500V2	1060	2/7/2025
System Validation Dipole**	SPEAG	D5GHzV2	1003	2/22/2025
System Validation Dipole**	SPEAG	D6.5GHzV2	1033	3/15/2025
System Validation Dipole**	SPEAG	CLA13	1008	1/12/2025

**Note(s):**

\*Equipment not used past calibration due date.

\*\*Dipole Calibration Date has been extended past 1 year. Impedance measurements have been performed to validate Dipole performance.

**Other**

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Keysight	N1911A	MY55196015	1/31/2025
Power Sensor	Agilent	N1921A	MY52270022	1/31/2025
Power Meter	Keysight	N1911A	MY55196009	1/31/2025
Power Sensor	Agilent	N1921A	MY552260009	1/31/2025
Power Meter	Keysight	N1921A	MY55196007	1/31/2025
Power Sensor	Agilent	N1921A	MY53020038	1/31/2025
Power Meter	Keysight	N1911A	MY55196009	1/31/2025
Power Meter	Keysight	N1911A	MY55196009	2/28/2025
Power Sensor	Keysight	N1921A	MY55200004	1/31/2025
Wideband Radio Communication Tester	R&S	CMW500	134853-ud	2/28/2025
Wideband Radio Communication Tester	R&S	CMW500	164541-Ci	2/28/2025
Wideband Radio Communication Tester	R&S	CMW500	171875-WG	2/28/2025
Wideband Radio Communication Tester	R&S	CMW500	18172-XJ	2/28/2025
Spectrum Analyzer	Agilent	E4446A	MY45300064	2/28/2025

**PD****System Check**

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Signal Generator	R&S	SMB 100A	180969-yC	2/21/2025
Power Meter	Keysight	N1912A	MY55196008	1/31/2025
Power Sensor	Agilent	N1912A	MY53260001	1/31/2025
Power Sensor	Agilent	N1912A	MY52200012	1/31/2025
Bi-directional coupler	Mini-Circuits	ZUDC10-183+	1722	N/A

**Lab Equipment**

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab C)	SPEAG	EummWV4	9589	9/5/2024
E-Field Probe (SAR Lab D)	SPEAG	EummWV4	9619	3/8/2025
Data Acquisition Electronics (SAR Lab C)	SPEAG	DAE4	1621	4/12/2025
Data Acquisition Electronics (SAR Lab D)	SPEAG	DAE4	1472	1/16/2025
Thermometer	TRACEABLE	6530CC	181163673	1/31/2025
Thermometer	TRACEABLE	6530CC	181062308	12/31/2024
5G Verification Source	SPEAG	10 GHz	1015	9/5/2024

**Other**

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Keysight	N1911A	MY55196015	1/31/2025
Power Sensor	Agilent	N1921A	MY52270022	1/31/2025
Power Meter	Keysight	N1911A	MY55196009	1/31/2025
Power Sensor	Agilent	N1921A	MY552260009	1/31/2025

## 5. Measurement Uncertainty

### SAR

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.

### PD

a		b	c	d f(d,k)	e	f = bxe/d	g
Error Description		Unc. Value ( $\pm$ dB)	Probab. Distri.	Div.	ci	Std. Unc. ( $\pm$ dB)	vi
<b>Uncertainty terms dependent on the measurement system</b>							
CAL	Calibration Repeatability	0.49	Normal	1	1	0.49	$\infty$
COR	Probe correction	0	Rectangular	1.732	1	0.00	$\infty$
FRS	Frequency response (BW = 1 GHz)	0.20	Rectangular	1.732	1	0.12	$\infty$
SCC	Sensor cross coupling	0	Rectangular	1.732	1	0.00	$\infty$
ISO	Isotropy	0.50	Rectangular	1.732	1	0.29	$\infty$
LIN	Linearity	0.20	Rectangular	1.732	1	0.12	$\infty$
PSC	Probe scattering	0	Rectangular	1.732	1	0.00	$\infty$
PPO	Probe positioning offset	0.30	Rectangular	1.732	1	0.17	$\infty$
PPR	Probe positioning repeatability	0.04	Rectangular	1.732	1	0.02	$\infty$
SMO	Sensor mechanical offset	0	Rectangular	1.732	1	0.00	$\infty$
PSR	Probe spatial resolution	0	Rectangular	1.732	1	0.00	$\infty$
FLD	Field impedance dependence	0	Rectangular	1.732	1	0.00	$\infty$
APD	Amplitude and phase drift	0	Rectangular	1.732	1	0.00	$\infty$
APN	Amplitude and phase noise	0.04	Rectangular	1.732	1	0.02	$\infty$
TR	Measurement area truncation	0	Rectangular	1.732	1	0.00	$\infty$
DAQ	Data acquisition	0.03	Normal	1	1	0.03	$\infty$
SMP	Sampling	0	Rectangular	1.732	1	0.00	$\infty$
REC	Field reconstruction	0.60	Rectangular	1.732	1	0.35	$\infty$
TRA	Forward transformation	0	Rectangular	1.732	1	0.00	$\infty$
SCA	Power density scaling	-	Rectangular	1.732	1	-	$\infty$
SAV	Spatial averaging	0.10	Rectangular	1.732	1	0.06	$\infty$
SDL	System detection limit	0.04	Rectangular	1.732	1	0.02	$\infty$
<b>Uncertainty terms dependent on the DUT and environmental factors</b>							
PC	Probe coupling with DUT	0	Rectangular	1.732	1	0	$\infty$
MOD	Modulation response	0.40	Rectangular	1.732	1	0.23	$\infty$
IT	Integration time	0	Rectangular	1.732	1	0	$\infty$
RT	Response time	0	Rectangular	1.732	1	0	$\infty$
DH	Device holder influence	0.10	Rectangular	1.732	1	0.06	$\infty$
DAQ	DUT alignment	0	Rectangular	1.732	1	0	$\infty$
AC	RF ambient conditions	0.04	Rectangular	1.732	1	0.02	$\infty$
AR	Ambient reflections	0.04	Rectangular	1.732	1	0.02	$\infty$
MSI	Immunity / secondary reception	0	Rectangular	1.732	1	0	$\infty$
DRI	Drift of the DUT	0.21	Rectangular	1.732	1	0.12	$\infty$
Combined Standard Uncertainty $U_c(f) =$			RSS			0.76	$\infty$
Expanded Uncertainty U, Coverage Factor = 2, > 95 % Confidence =						1.52	

## 6. Dielectric Property Measurements & System Check

### 6.1. SAR Dielectric Property Measurements and System Checks

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within  $\pm 2^\circ\text{C}$  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 ( $\epsilon_r$ ) and conductivity ( $\sigma$ ) of typical tissue-equivalent media recipes are expected to be within  $\pm 5\%$  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  $\epsilon_r$  and  $\sigma$  may be relaxed to  $\pm 10\%$ . This is limited to frequencies  $\leq 3$  GHz.

#### Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	$\epsilon_r$	$\sigma$ (S/m)	$\epsilon_r$	$\sigma$ (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

#### System Verification

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:  $2.0 \pm 0.2$  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 for SAR measurements  $\leq 3$  GHz and  $\geq 10.0$  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.



**Liquid and System Check Results**

Liquid Check										System Check																	
SAR Lab	Date	Tissue Type	Band (MHz)	Freq. (MHz)	Relative Permittivity (εr)			Conductivity (σ)			Date	Dipole Type & Serial Number	Dipole Cal. Due Date	Input Power (dBm)	Measured results for 1-g SAR				Measured results for 10-g SAR				Measured results for APD4 cm <sup>2</sup>				Plot No.
					Measured	Target	Delta	Measured	Target	Delta					Meas. Zoom Scan	Normalize to 1 W	Target (Ref. Value)	Delta ±10%	Meas. Zoom Scan	Normalize to 1 W	Target (Ref. Value)	Delta ±10%	Meas. Zoom Scan	Normalize to 1 W	Target (Ref. Value)	Delta ±10%	
SAR G	7/26/2024	Head	13	13	51.94	55.00	-5.66%	0.70	0.75	-6.41%	7/26/2024	CLA13 SN 1008	1/12/2025	30.0	0.492	0.492	0.544	-9.56%	0.309	0.309	0.338	-8.58%	NA	NA	NA	NA	1
				12	51.42	55.00	-6.51%	0.70	0.75	-6.40%																	
				14	52.82	55.00	-3.96%	0.70	0.75	-6.37%																	
SAR I	7/29/2024	Head	3500	3500	38.98	37.93	2.77%	2.73	2.91	-6.27%	7/28/2024	D9500V2 SN 1060	2/7/2025	20.0	6.290	62.900	65.700	-4.26%	2.420	24.200	24.900	-2.81%	NA	NA	NA	NA	2
				3400	39.14	38.04	2.88%	2.64	2.81	-5.95%																	
				3700	38.85	37.70	2.52%	2.90	3.12	-6.97%																	
SAR 1	7/26/2024	Head	2450	2450	39.41	39.20	0.54%	1.73	1.80	-4.11%	7/26/2024	D2450V2 SN 706	1/20/2025	20.0	5.150	51.500	52.300	-1.53%	2.450	24.500	24.500	0.00%	NA	NA	NA	NA	3
				2400	39.47	39.30	0.44%	1.69	1.75	-3.63%																	
				2500	39.32	39.14	0.47%	1.76	1.85	-4.91%																	
SAR 1	7/30/2024	Head	2450	2450	39.56	39.20	0.92%	1.73	1.80	-3.83%	7/30/2024	D2450V2 SN 706	1/20/2025	20.0	5.240	52.400	52.300	0.19%	2.490	24.900	24.500	1.63%	NA	NA	NA	NA	4
				2400	39.64	39.30	0.87%	1.69	1.75	-3.52%																	
				2500	39.46	39.14	0.83%	1.77	1.85	-4.48%																	
SAR 4	7/30/2024	Head	2450	2450	40.53	39.20	3.39%	1.73	1.80	-3.89%	7/30/2024	D2450V2 SN 706	1/20/2025	20.0	5.110	51.100	52.300	-2.29%	2.450	24.500	24.500	0.00%	NA	NA	NA	NA	5
				2400	40.60	39.30	3.32%	1.69	1.75	-3.63%																	
				2500	40.42	39.14	3.28%	1.77	1.85	-4.43%																	
SAR 6	7/26/2024	Head	6500	6500	32.80	34.50	-4.93%	6.08	6.07	0.20%	7/26/2024	D6.5GHV2 SN 1033	3/15/2025	19.0	23.7	298.4	288.0	3.60%	4.27	53.76	53.10	1.24%	104	1309	1300	0.71%	6
				5900	33.97	35.20	-3.49%	5.35	5.38	-0.50%																	
				7200	31.59	33.70	-6.28%	6.83	6.89	-0.94%																	
SAR 7	7/26/2024	Head	6500	6500	33.30	34.50	-3.48%	5.95	6.07	-1.94%	7/26/2024	D6.5GHV2 SN 1033	3/15/2025	20.0	26.8	268.0	288.0	-6.94%	5.00	50.00	53.10	-5.84%	122	1220	1300	-6.15%	7
				5900	34.33	35.20	-2.47%	5.25	5.38	-2.42%																	
				7200	32.31	33.70	-4.12%	6.66	6.89	-3.32%																	
SAR 7	7/30/2024	Head	6500	6500	33.44	34.50	-3.07%	6.19	6.07	2.04%	7/30/2024	D6.5GHV2 SN 1033	3/15/2025	19.0	22.9	288.3	288.0	0.10%	4.26	53.63	53.10	1.00%	104	1309	1300	0.71%	8
				5900	34.60	35.20	-1.70%	5.39	5.38	0.11%																	
				7200	32.12	33.70	-4.69%	6.99	6.89	1.42%																	
SAR 9	7/29/2024	Head	5600	5600	35.28	35.53	-0.71%	4.91	5.06	-2.89%	7/29/2024	D5GHV2 SN 1003 (5.60 GHz)	2/22/2025	20.0	8.290	82.900	83.000	-0.12%	2.390	23.900	23.700	0.84%	NA	NA	NA	NA	9
				5500	35.42	35.85	-0.64%	4.78	4.96	-3.59%																	
				5725	35.02	35.38	-1.05%	5.01	5.19	-3.36%																	
SAR 12	7/29/2024	Head	1640	1640	42.81	40.25	6.35%	1.26	1.31	-3.97%	7/29/2024	D1640V2 SN 324	6/13/2025	20.0	3.290	32.900	33.900	-2.95%	1.850	18.500	18.300	1.09%	NA	NA	NA	NA	10
				1610	42.82	40.30	6.25%	1.24	1.29	-4.03%																	
				1665	42.77	40.22	6.36%	1.27	1.32	-3.79%																	
SAR 12	7/29/2024	Head	1750	1750	42.62	40.08	6.33%	1.32	1.37	-3.43%	7/29/2024	D1750V2 SN 1053	10/13/2024	20.0	3.320	33.200	36.600	-9.29%	1.800	18.000	19.300	-6.74%	NA	NA	NA	NA	11
				1695	42.71	40.17	6.33%	1.29	1.34	-3.58%																	
				1780	42.61	40.04	6.42%	1.33	1.39	-4.39%																	
SAR 18	7/21/2024	Head	2450	2450	40.50	39.20	3.32%	1.76	1.80	-2.50%	7/21/2024	D2450V2 SN 748	2/8/2025	20.0	5.330	53.300	51.700	3.09%	2.530	25.300	24.200	4.55%	NA	NA	NA	NA	12
				2400	40.60	39.30	3.32%	1.72	1.75	-1.69%																	
				2500	40.43	39.14	3.30%	1.79	1.85	-3.56%																	
SAR 18	7/29/2024	Head	2450	2450	40.54	39.20	3.42%	1.80	1.80	0.00%	7/29/2024	D2450V2 SN 748	2/8/2025	20.0	5.470	54.700	51.700	5.80%	2.600	26.000	24.200	7.44%	NA	NA	NA	NA	13
				2400	40.61	39.30	3.34%	1.76	1.75	0.65%																	
				2500	40.46	39.14	3.38%	1.84	1.85	-0.81%																	

## 6.2. Power Density Measurement System Validation & System Check

Per Nov 2017, TCB Workshop

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

System check is also required before each series of continuous measurement and as applicable, repeated at least weekly.

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.
- 1 cm<sup>2</sup> and 4 cm<sup>2</sup> spatial averaging have been recommended in the AHG10 draft TR with reference targets available for specific waveguide.
- 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 16% (0.66 dB) of the calibrated targets.

The system components, software settings and other system parameters shall be the same as those used for the compliance tests. The system check shall be performed at closest probe calibration frequency point as in the compliance tests, e.g., if the EUT operates at 35 GHz, it is recommended to perform the validation at 30 GHz.

### PD System Validation Results

SAR Lab	Test Date	SG Probe SN	Probe Cal. Due Date	DAESN	DAE Cal. Due Date	Frequency (GHz)	SG Verification Source SN	Source Cal. Due Date	Averaging Type	Input Power Source Cal. (dBm)	Input Power System Cart (dBm)	Measured psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to Input Power Source Cal. (W/m <sup>2</sup> )	Target psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta	Measured psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to Input Power Source Cal. (W/m <sup>2</sup> )	Target psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	63.9	62.4	56.1	0.47	11%	64.2	62.7	56.1	0.49	12%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	62.9	61.5	56.1	0.40	10%	63.4	62.0	56.1	0.43	10%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	60.2	58.8	56.1	0.21	5%	60.4	59.0	56.1	0.22	5%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	59.1	57.8	56.1	0.13	3%	59.3	58.0	56.1	0.14	3%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	59.4	58.0	56.1	0.15	3%	60.0	58.6	56.1	0.19	5%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	59.4	58.0	56.1	0.15	3%	59.6	58.2	56.1	0.16	4%
C	5/21/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	59.2	57.9	56.1	0.13	3%	59.4	58.0	56.1	0.15	3%
C	5/22/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	60.0	58.6	56.1	0.19	5%	60.4	59.0	56.1	0.22	5%
C	5/22/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	58.2	56.9	56.1	0.06	1%	58.4	57.1	56.1	0.07	2%
C	5/22/2024	9589	9/5/2024	1621	4/12/2025	10	1015	9/5/2024	Square	19.9	20.00	59.1	57.8	56.1	0.13	3%	59.4	58.0	56.1	0.15	3%
Average												60.1	58.8	56.1	0.20	5%	60.5	59.1	56.1	0.22	5%

SAR Lab	Test Date	SG Probe SN	Probe Cal. Due Date	DAESN	DAE Cal. Due Date	Frequency (GHz)	SG Verification Source SN	Source Cal. Due Date	Averaging Type	Input Power Source Cal. (dBm)	Input Power System Cart (dBm)	Measured psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to Input Power Source Cal. (W/m <sup>2</sup> )	Target psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta	Measured psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to Input Power Source Cal. (W/m <sup>2</sup> )	Target psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.6	58.2	56.1	0.16	4%	59.9	58.5	56.1	0.18	4%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.1	57.8	56.1	0.13	3%	59.3	58.0	56.1	0.14	3%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	58.2	56.9	56.1	0.06	1%	58.5	57.2	56.1	0.08	2%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.3	58.0	56.1	0.14	3%	59.7	58.3	56.1	0.17	4%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.3	58.0	56.1	0.14	3%	59.5	58.1	56.1	0.16	4%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	58.8	57.5	56.1	0.10	2%	59.0	57.7	56.1	0.12	3%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.0	57.7	56.1	0.12	3%	59.2	57.9	56.1	0.13	3%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	58.6	57.3	56.1	0.09	2%	58.9	57.6	56.1	0.11	3%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	59.3	58.0	56.1	0.14	3%	59.6	58.2	56.1	0.16	4%
D	5/20/2024	9619	3/8/2025	1472	1/16/2025	10	1015	9/5/2024	Square	19.9	20.00	58.2	56.9	56.1	0.06	1%	58.5	57.2	56.1	0.08	2%
Average												58.9	57.6	56.1	0.11	3%	59.2	57.9	56.1	0.13	3%

### PD System Check Results

SAR Lab	Date	Frequency (GHz)	SG Verification Source SN	Source Cal. Due Date	Input Power (dBm)	Prad (mW)	Ohmic & Mismatch Loss (dB)	Measured psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to 20 dBm W/m <sup>2</sup>	Target psPDn (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta ±16 %	Measured psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Normalized to 20 dBm W/m <sup>2</sup>	Target psPDtot (W/m <sup>2</sup> ) over 4cm <sup>2</sup>	Deviation (dB)	Delta ±16 %	Plot
C	7/22/2024	10	1015	9/5/2024	17.00	93.30	0.30	29.2	58.2	58.8	-0.04	-1%	29.3	58.4	59.1	-0.05	-1%	14
D	7/16/2024	10	1015	9/5/2024	17.00	93.30	0.30	29.2	58.2	57.6	0.05	0.01	29.3	58.4	57.9	0.04	0.01	15

## 7. SAR Measurements

### 7.1. Test Rationale

This application for certification is leveraging the data reuse procedure from TCB workshop April 2021; RF Exposure Procedures (Remarks on Test Reductions via Data Referencing for Closely Related Products) based on reference FCC ID: **BCG-E8684A** (UL report# 14982479-S1) to cover variants FCC ID: **BCG-E8685A, BCG-E8686A and BCG-E8687A**. The major difference between the reference model and the variant models is the depopulation of FR2 (mmWave) ANT and that support for some LTE/5GNR bands and MSS is disabled via software in the variant models. All other circuitry and features are identical.

### 7.2. Data Reuse Approach

The data reuse test plan was approved via manufacturer KDB inquiry. Full RF exposure testing was performed on the reference model. The configurations with the highest SAR results for each equipment class were identified. These configurations were tested on the variant models.

The variation in SAR results was well within the uncertainty budget of the SAR test equipment. The variant SAR results and worst-case reference model SAR results are summarized in § 1.

### 7.3. Measured and Reported (Scaled) SAR Results

#### 7.3.1. A3295 Spot Check Results

Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
TNE	5G NR (FR1)	n53	ANT 2	Hotspot	DFTs-OFDM n/2 BPSK	Mode B	5	Edge Left	497860	2489.3	1	1		18.4	18.20	0.803	<b>0.841</b>	0.351	0.368	1
TNE	MSS	L-Band	ANT 1	Extremity	1-PRB SC-FDMA	Mode B	0	Edge Right	262391	1617.6				24.5	23.50	3.35	4.22	1.30	<b>1.64</b>	2
PCE	WCDMA	IV	ANT 1	Hotspot	Rel. 99	Mode B	5	Edge Bottom	1312	1712.4				20.8	19.9	0.668	<b>0.822</b>	0.288	0.354	3
CBE	5G NR (FR1)	n48	ANT 8	Body & Hotspot	DFTs-OFDM n/2 BPSK	Mode B	5	Back	642890	3643.4	50	28		20.0	19.4	0.557	<b>0.640</b>	0.204	0.234	4
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
DTS	WLAN 2.4GHz	DTS	ANT 3	Hotspot	802.11b	Power State 1 Mode B	5	Edge Left	6	2437.0			99.91%	20.0	18.4	0.711	<b>1.029</b>	0.332	0.480	5
NI	WLAN 5GHz	UNI-2C	ANT 6	Body & Hotspot	802.11ac (VHT160)	Power State 1 Mode B	5	Back	114	5570.0			92.54%	14.0	13.5	0.669	<b>0.817</b>	0.203	0.248	6
DSS	Bluetooth	2.4GHz	ANT 3	Hotspot	GFSK (BDR)	Standalone Mode B	5	Edge Left	39	2441.0				20.0	19.4	0.508	<b>0.589</b>	0.230	0.267	7
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
DXX	NFC	NFC	Primary	Extremity	Type A	N/A	0	Edge Top		13.56					0.021				<b>0.007</b>	8
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	APD Meas. (W/m <sup>2</sup> )	APD Scaled (W/m <sup>2</sup> )	Plot No.	
6CD	WLAN	UNI-8	ANT 5	Body-w/orn & Extremity	802.11ax (HE160)	Power State 1 Mode B	5	Back	207	6985.0	97.88%	10.5	8.8	0.327	<b>0.500</b>	0.075	0.115	1.780	2.721	9

**Note(s):**

For reference model FCC ID: BCG-E8684A, both MSS Antennas, ANT 1 and ANT 4 were evaluated for RF Exposure. Per manufacturer, only ANT 4 will be enabled and used for MSS transmissions in production units. ANT 1 will be disabled in production units. For variant models FCC IDs: BCG-E8685A (A3295) and BCG-E8686A (A3296), spot checks were performed on the MSS ANT that yielded the Highest SAR from reference model FCC ID: BCG-E8684A.

#### 7.3.2. A3296 Spot Check Results

Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
TNE	5G NR (FR1)	n53	ANT 2	Hotspot	DFTs-OFDM n/2 BPSK	Mode B	5	Edge Left	497860	2489.3	1	1		18.4	18.20	0.831	0.870	0.363	0.380	10
TNE	MSS	L-Band	ANT 1	Extremity	1-PRB SC-FDMA	Mode B	0	Edge Right	262391	1617.6				24.5	23.50	3.86	4.86	1.41	<b>1.78</b>	11
PCE	WCDMA	IV	ANT 1	Hotspot	Rel. 99	Mode B	5	Edge Bottom	1312	1712.4				20.8	19.9	0.546	<b>0.672</b>	0.234	0.288	12
CBE	5G NR (FR1)	n48	ANT 8	Body & Hotspot	DFTs-OFDM n/2 BPSK	Mode B	5	Back	642890	3643.4	50	28		20.0	19.4	0.603	<b>0.692</b>	0.211	0.242	13
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
DTS	WLAN 2.4GHz	DTS	ANT 3	Hotspot	802.11b	Power State 1 Mode B	5	Edge Left	6	2437.0			99.91%	20.0	18.4	0.699	<b>1.011</b>	0.324	0.469	14
NI	WLAN 5GHz	UNI-2C	ANT 6	Body & Hotspot	802.11ac (VHT160)	Power State 1 Mode B	5	Back	114	5570.0			92.54%	14.0	13.5	0.652	<b>0.796</b>	0.196	0.239	15
DSS	Bluetooth	2.4GHz	ANT 3	Hotspot	GFSK (BDR)	Standalone Mode B	5	Edge Left	39	2441.0				20.0	19.4	0.509	<b>0.590</b>	0.236	0.273	16
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.
DXX	NFC	NFC	Primary	Extremity	Type A	N/A	0	Edge Top		13.56					0.020				<b>0.007</b>	17
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	APD Meas. (W/m <sup>2</sup> )	APD Scaled (W/m <sup>2</sup> )	Plot No.
6CD	WLAN	UNI-8	ANT 5	Body-w/orn & Extremity	802.11ax (HE160)	Power State 1 Mode B	5	Back	207	6985.0	97.88%	10.5	8.8	0.256	<b>0.391</b>	0.058	0.089	1.380	2.110	18

**Note(s):**

For reference model FCC ID: BCG-E8684A, both MSS Antennas, ANT 1 and ANT 4 were evaluated for RF Exposure. Per manufacturer, only ANT 4 will be enabled and used for MSS transmissions in production units. ANT 1 will be disabled in production units. For variant models FCC IDs: BCG-E8685A (A3295) and BCG-E8686A (A3296), spot checks were performed on the MSS ANT that yielded the Highest SAR from reference model FCC ID: BCG-E8684A.

### 7.3.3. A3297 Spot Check Results

Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.		
PCE	WCDMA	I	ANT 1	Hotspot	Rel. 99	Mode B	5	Edge Bottom	1312	1712.4				20.8	19.9	0.644	<b>0.792</b>	0.279	0.343	19		
CBE	5G NR (FR1)	n48	ANT 8	Body & Hotspot	DFTs-OFDM π/2 BPSK	Mode B	5	Back	642890	3643.4	50	28		20.0	19.4	0.713	<b>0.819</b>	0.248	0.285	20		
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.		
DTS	WLAN 2.4GHz	DTS	ANT 3	Hotspot	802.11b	Power State 1 Mode B	5	Edge Left	6	2437.0			99.91%	20.0	18.4	0.651	<b>0.942</b>	0.307	0.444	21		
NI	WLAN 5GHz	UNII-2C	ANT 6	Body & Hotspot	802.11ac (VHT160)	Power State 1 Mode B	5	Back	114	5570.0			92.54%	14.0	13.5	0.725	<b>0.885</b>	0.219	0.267	22		
DSS	Bluetooth	2.4GHz	ANT 3	Hotspot	GFSK (BDR)	Pastandalone Mode B	5	Edge Left	39	2441.0				20.0	19.4	0.452	<b>0.524</b>	0.206	0.239	23		
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	Plot No.		
DXX	NFC	NFC	Primary	Extremity	Type A	NA	0	Edge Top		13.56					0.000				<b>0.000</b>	24		
Equipment Class	Technology	Band	Antenna	RF Exposure Condition	Mode	Power Mode(s)	Dist (mm)	Test Position	Channel	Freq. (MHz)	RB Allocation	RB Offset	Duty Cycle (%)	Max Output Pwr (dBm)	Meas. (dBm)	1-g Meas. (W/kg)	1-g Scaled (W/kg)	10-g Meas. (W/kg)	10-g Scaled (W/kg)	APD Meas. (W/m <sup>2</sup> )	APD Scaled (W/m <sup>2</sup> )	Plot No.
6CD	WLAN	UNII-8	ANT 5	Body-worn & Extremity	802.11ax (HE160)	Power State 1 Mode B	5	Back	207	6985.0			97.88%	10.5	8.8	0.315	<b>0.482</b>	0.071	0.109	1.690	2.583	25

## 8. Measured and Reported (Scaled) PD Results

Per TCB workshop October 2018, 4 cm<sup>2</sup> averaging area is considered.

psPD value (mW/cm<sup>2</sup>) used the psPD<sub>tot+</sub> avg value (W/m<sup>2</sup>) of test result plot.

### Wi-Fi 6GHz Test Rationale:

- Following KDB 388624 D02 Pre-Approval Guidance List v18r05, Appendix OVER6G Step 4:
  - The process of steps 3.1 to 3.4 shall be repeated for at least five channels, at the channel center frequency, selected to cover uniformly the largest frequency ranges used in the device, between 5925 MHz and 7125 MHz, and consistent with KDB Publication 248227 test configuration provisions.
- Following KDB 248227 D01 802.11 Wi-Fi SAR v02r02, §4:
  - When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/ax/be mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.
- No channels that could transmit below 6GHz were selected for testing to use the PTP-PR Test Methodology.
- The initial test position for iPD was determined using the worst-case 1-g SAR, please refer to FCC ID: BCG-E8684A (UL report# 14982479-S1) §10.39.

## 8.1. A3295 PTP-PR PD Results

### iPDn Investigation Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	UNII Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuPLimit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	PD <sub>i</sub>	Meas. psPD <sub>i</sub> (W/m <sup>2</sup> )	Scaled psPD <sub>i</sub> (W/cm <sup>2</sup> )	Grid Step Size (λ)	Dist. (mm)	PD <sub>i</sub>	Meas. psPD <sub>i</sub> (W/m <sup>2</sup> )	Scaled psPD <sub>i</sub> (W/cm <sup>2</sup> )	Criterion 1: 2-1	Criterion 2: 10% of Limit
Body & Hotspot	ANT 6	Power State 1	Back	UNII-5	47	6185.0	802.11ax (HE160)	93.86%	9.50	8.40	1.581	0.0410	2	3.310	2.330	4.745	0.2500	9.694	1.410	1.140	2.322	3.706	Continue to 2: Full Testing
Body & Hotspot	ANT 6	Power State 1	Back	UNII-8	187	6885.0	802.11ax (HE160)	93.86%	9.00	7.80	1.566	0.0410	2	4.26	3.580	7.391	0.2500	8.709	3.660	1.730	3.572	0.659	Continue to 2: Full Testing

#### Note(s):

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).

### PTP-PR PD Measured Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	UNII Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuPLimit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	Meas. psPD <sub>i</sub> (W/m <sup>2</sup> )	Scaled psPD <sub>i</sub> (W/cm <sup>2</sup> )	Meas. psPD <sub>tot+</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>tot+</sub> (W/cm <sup>2</sup> )	Plot No.
Body & Hotspot	ANT 5	Power State 1	Back	UNII-5	15	6025.0	802.11ax (160 MHz)	97.88%	11.25	9.70	1.584	0.0410	2	0.235	0.532	0.289	0.654	
Body & Hotspot	ANT 5	Power State 1	Back	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.274	0.591	0.322	0.695	
Body & Hotspot	ANT 5	Power State 1	Back	UNII-6	111	6505.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.574	0.0410	2	0.236	0.525	0.288	0.640	
Body & Hotspot	ANT 5	Power State 1	Back	UNII-7	143	6665.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.571	0.0410	2	0.236	0.524	0.283	0.628	
Body & Hotspot	ANT 5	Power State 1	Back	UNII-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.263	0.581	0.304	0.672	
Body & Hotspot	ANT 5	Power State 1	Front	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.131	0.283	0.137	0.296	
Body & Hotspot	ANT 5	Power State 1	Edge Top	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.022	0.048	0.023	0.050	
Body & Hotspot	ANT 5	Power State 1	Edge Right	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.032	0.069	0.033	0.072	
Body & Hotspot	ANT 5	Power State 1	Edge Bottom	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.051	0.109	0.061	0.131	
Body & Hotspot	ANT 5	Power State 1	Edge Left	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.169	0.365	0.176	0.380	
Body & Hotspot	ANT 6	Power State 1	Back	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.283	0.583	0.339	<b>0.698</b>	26
Body & Hotspot	ANT 6	Power State 1	Back	UNII-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.267	0.562	0.329	0.692	
Body & Hotspot	ANT 6	Power State 1	Back	UNII-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.25	1.574	0.0410	2	0.238	0.529	0.310	0.689	
Body & Hotspot	ANT 6	Power State 1	Back	UNII-7	119	6545.0	802.11ax (80 MHz)	98.87%	8.75	7.25	1.573	0.0410	2	0.231	0.513	0.295	0.656	
Body & Hotspot	ANT 6	Power State 1	Back	UNII-8	187	6885.0	802.11ax (40 MHz)	99.48%	8.00	6.90	1.566	0.0410	2	0.162	0.327	0.312	0.629	
Body & Hotspot	ANT 6	Power State 1	Front	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.015	0.032	0.016	0.032	
Body & Hotspot	ANT 6	Power State 1	Edge Top	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.040	0.082	0.042	0.085	
Body & Hotspot	ANT 6	Power State 1	Edge Right	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.021	0.043	0.022	0.045	
Body & Hotspot	ANT 6	Power State 1	Edge Bottom	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.011	0.023	0.012	0.025	
Body & Hotspot	ANT 6	Power State 1	Edge Left	UNII-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.85	1.581	0.0410	2	0.082	0.168	0.107	0.220	

#### Note(s):

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).
- Testing was performed at the most conservative Grid Step Size of 0.041 lambda.

## 8.2. A3296 PTP-PR PD Results

### iPDn Investigation Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	U-NI Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuPLimit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	psPD <sub>sc</sub>	Meas. psPD <sub>sc</sub> (W/m <sup>2</sup> )	Scaled psPD <sub>sc</sub> (W/m <sup>2</sup> )	Grid Step Size (λ)	Dist. (mm)	psPD <sub>sc</sub>	Meas. psPD <sub>sc</sub> (W/m <sup>2</sup> )	Scaled psPD <sub>sc</sub> (W/m <sup>2</sup> )	Criterion 1: z-1	Criterion 2: 10% of Limit
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	47	6185.0	802.11ax (HE160)	93.86%	9.50	8.40	1.581	0.0410	2	3.310	2.330	4.745	0.2500	9.694	1.410	1.140	2.322	3.706	Continue to 2. Full Testing
Body & Hotspot	ANT 6	Power State 1	Back	UNI-8	187	6885.0	802.11ax (HE40)	93.86%	9.00	7.80	1.566	0.0410	2	4.26	3.580	7.391	0.2500	8.709	3.660	1.730	3.572	0.659	Continue to 2. Full Testing

**Note(s):**

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).

### PTP-PR PD Measured Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	U-NI Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuPLimit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	Meas. psPD <sub>sc</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>sc</sub> (W/cm <sup>2</sup> )	Meas. psPD <sub>sc</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>sc</sub> (W/cm <sup>2</sup> )	Plot No.
Body & Hotspot	ANT 5	Power State 1	Back	UNI-5	15	6025.0	802.11ax (160 MHz)	97.88%	11.25	9.70	1.584	0.0410	2	0.232	0.525	0.284	0.643	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.220	0.475	0.261	0.563	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.574	0.0410	2	0.237	0.527	0.273	0.607	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-7	143	6665.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.571	0.0410	2	0.228	0.506	0.267	0.592	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.263	0.581	0.303	<b>0.669</b>	27
Body & Hotspot	ANT 5	Power State 1	Front	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.029	0.064	0.034	0.076	
Body & Hotspot	ANT 5	Power State 1	Edge Top	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.008	0.018	0.009	0.019	
Body & Hotspot	ANT 5	Power State 1	Edge Right	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.012	0.027	0.013	0.028	
Body & Hotspot	ANT 5	Power State 1	Edge Bottom	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.030	0.066	0.035	0.076	
Body & Hotspot	ANT 5	Power State 1	Edge Left	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.091	0.201	0.102	0.225	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.83	1.581	0.0410	2	0.236	0.488	0.316	0.654	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.193	0.406	0.286	0.602	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.234	0.469	0.346	0.694	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-7	119	6545.0	802.11ax (80 MHz)	98.87%	8.75	7.70	1.573	0.0410	2	0.240	0.481	0.338	0.677	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-8	187	6885.0	802.11ax (40 MHz)	99.48%	8.00	6.90	1.566	0.0410	2	0.185	0.373	0.324	0.654	
Body & Hotspot	ANT 6	Power State 1	Front	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.038	0.076	0.044	0.088	
Body & Hotspot	ANT 6	Power State 1	Edge Top	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.012	0.024	0.014	0.028	
Body & Hotspot	ANT 6	Power State 1	Edge Right	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.018	0.035	0.019	0.037	
Body & Hotspot	ANT 6	Power State 1	Edge Bottom	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.013	0.025	0.013	0.026	
Body & Hotspot	ANT 6	Power State 1	Edge Left	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.70	1.574	0.0410	2	0.073	0.146	0.104	0.208	

**Note(s):**

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).
- Testing was performed at the most conservative Grid Step Size of 0.041 lambda.

### 8.3. A3297 PTP-PR PD Results

#### iPDn Investigation Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	U-NI Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuP Limit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	μD <sub>1</sub>	Meas. psPD <sub>1</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>1</sub> (W/cm <sup>2</sup> )	Grid Step Size (λ)	Dist. (mm)	μD <sub>2</sub>	Meas. psPD <sub>2</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>2</sub> (W/cm <sup>2</sup> )	Criterion 1: z-1	Criterion 2: 10% of Link
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	47	6185.0	802.11ax (HE16Q)	93.86%	9.50	8.40	1.581	0.0410	2	3.310	2.330	4.745	0.2500	9.694	1.410	1.140	2.322	3.706	Continue to 2: Full Testing
Body & Hotspot	ANT 6	Power State 1	Back	UNI-8	187	6885.0	802.11ax (HE4Q)	93.86%	9.00	7.80	1.566	0.0410	2	4.26	3.580	7.391	0.2500	8.709	3.660	1.730	3.572	0.659	Continue to 2: Full Testing

**Note(s):**

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).

#### PTP-PR PD Measured Results

RF Exposure Conditions	Transmitter	Power Mode	Test Position	U-NI Band	Ch No.	Freq. (MHz)	Mode	Duty Cycle (%)	TuP Limit (dBm)	Meas. (dBm)	Uncertainty Scaling Factor	Grid Step Size (λ)	Dist. (mm)	Meas. psPD <sub>1</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>1</sub> (W/cm <sup>2</sup> )	Meas. psPD <sub>2</sub> (W/cm <sup>2</sup> )	Scaled psPD <sub>2</sub> (W/cm <sup>2</sup> )	Plot No.
Body & Hotspot	ANT 5	Power State 1	Back	UNI-5	15	6025.0	802.11ax (160 MHz)	97.88%	11.25	9.70	1.584	0.0410	2	0.227	0.514	0.260	0.589	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-5	47	6185.0	802.11ax (160 MHz)	97.88%	11.25	9.90	1.581	0.0410	2	0.249	0.537	0.280	0.604	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.574	0.0410	2	0.227	0.505	0.261	0.580	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-7	143	6665.0	802.11ax (160 MHz)	97.88%	10.25	8.75	1.571	0.0410	2	0.239	0.530	0.282	0.626	
Body & Hotspot	ANT 5	Power State 1	Back	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.235	0.519	0.288	<b>0.636</b>	28
Body & Hotspot	ANT 5	Power State 1	Front	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.038	0.084	0.043	0.095	
Body & Hotspot	ANT 5	Power State 1	Edge Top	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.019	0.042	0.019	0.042	
Body & Hotspot	ANT 5	Power State 1	Edge Right	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.024	0.052	0.024	0.052	
Body & Hotspot	ANT 5	Power State 1	Edge Bottom	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.030	0.066	0.036	0.079	
Body & Hotspot	ANT 5	Power State 1	Edge Left	UNI-8	207	6985.0	802.11ax (160 MHz)	97.88%	10.50	9.00	1.564	0.0410	2	0.116	0.256	0.127	0.281	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	47	6185.0	802.11ax (160 MHz)	97.88%	10.00	8.83	1.581	0.0410	2	0.268	0.555	0.312	0.646	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.284	0.597	0.332	0.698	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-6	111	6505.0	802.11ax (160 MHz)	97.88%	8.75	7.25	1.574	0.0410	2	0.219	0.487	0.314	0.698	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-7	119	6545.0	802.11ax (80 MHz)	98.87%	8.75	7.25	1.573	0.0410	2	0.239	0.531	0.313	0.696	
Body & Hotspot	ANT 6	Power State 1	Back	UNI-8	187	6885.0	802.11ax (40 MHz)	99.48%	8.00	6.90	1.566	0.0410	2	0.250	0.504	0.344	0.694	
Body & Hotspot	ANT 6	Power State 1	Front	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.003	0.007	0.004	0.008	
Body & Hotspot	ANT 6	Power State 1	Edge Top	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.052	0.109	0.053	0.112	
Body & Hotspot	ANT 6	Power State 1	Edge Right	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.003	0.007	0.004	0.008	
Body & Hotspot	ANT 6	Power State 1	Edge Bottom	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.006	0.012	0.006	0.012	
Body & Hotspot	ANT 6	Power State 1	Edge Left	UNI-5	79	6345.0	802.11ax (160 MHz)	97.88%	10.00	8.75	1.577	0.0410	2	0.063	0.133	0.069	0.146	

**Note(s):**

- MU scaling applied due to total uncertainty (1.52 dB, 41.9%) exceeds the 30% budget. Scaling applied for the amount exceeding the 30% budget (11.9%).
- Testing was performed at the most conservative Grid Step Size of 0.041 lambda.

## **Appendixes**

**Refer to separated files for the following appendixes.**

**Appendix A: Setup Photos**

**Appendix B: System Check Plots**

**Appendix C: Highest Test Plots**

**Appendix D: SAR Tissue Ingredients**

**Appendix E: Probe Certificates**

**Appendix F: Dipole & 5G Source Certificates**

**END OF REPORT**