



ELEMENT MATERIALS TECHNOLOGY

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SAR EVALUATION REPORT

Applicant Name:
Apple Inc.
One Apple Park Way
Cupertino, CA 95014 USA

Date of Testing:
06/05/2023
Test Report Issue Date:
06/07/2023
Test Site/Location:
Element Morgan Hill, CA, USA
Document Serial No.:
1C2305090018-02.BCG (Rev1)

FCC ID: BCGA2761

APPLICANT: APPLE, INC.

DUT Type: Tablet Device
Application Type: Class II Permissive Change
FCC Rule Part(s): CFR §2.1093
Permissive Change(s): See FCC Change Document
Model: A2761, A2762
Reference FCC ID: BCGA2435
Date of Original Certification: 10/18/2022

Equipment Class	Band & Mode	Tx Frequency	SAR
			1g Body (W/kg)
CBE	NR Band n48	3555.0 - 3694.98 MHz	0.95

Note: This revised Test Report supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

Note: This table above includes test data from RF exposure technical report S/N: 1C2305090017-02.BCG per FCC TCB workshop for data referencing of closely related product FCC ID BCGA2435

Only operations relevant to this permissive change were evaluated for compliance. Please see the original compliance evaluation in RF Exposure Technical Report S/N 1C2205090026-25.BCG (Rev 3) for complete evaluation of all other operating modes. The operational description includes a description of all changed items.

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.9 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

RJ Ortanez

Executive Vice President



The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: sartick@mwfi.info.

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APPENDIX A: SAR TISSUE SPECIFICATIONS

APPENDIX B: DUT ANTENNA DIAGRAM & SAR TEST SETUP PHOTOGRAPHS

APPENDIX C: PROBE AND DIPOLE CALIBRATION CERTIFICATES

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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
UMTS 850	Data	826.40 - 846.60 MHz
UMTS 1750	Data	1712.4 - 1752.6 MHz
UMTS 1900	Data	1852.4 - 1907.6 MHz
LTE Band 71	Voice/Data	665.5 - 695.5 MHz
LTE Band 12	Voice/Data	699.7 - 715.3 MHz
LTE Band 17	Voice/Data	706.5 - 713.5 MHz
LTE Band 13	Voice/Data	779.5 - 784.5 MHz
LTE Band 14	Voice/Data	790.5 - 795.5 MHz
LTE Band 26 (Cell)	Voice/Data	814.7 - 848.3 MHz
LTE Band 5 (Cell)	Voice/Data	824.7 - 848.3 MHz
LTE Band 66 (AWS)	Voice/Data	1710.7 - 1779.3 MHz
LTE Band 4 (AWS)	Voice/Data	1710.7 - 1754.3 MHz
LTE Band 25 (PCS)	Voice/Data	1850.7 - 1914.3 MHz
LTE Band 2 (PCS)	Voice/Data	1850.7 - 1909.3 MHz
LTE Band 30	Voice/Data	2307.5 - 2312.5 MHz
LTE Band 7	Voice/Data	2502.5 - 2567.5 MHz
LTE Band 41	Voice/Data	2498.5 - 2687.5 MHz
LTE Band 48	Voice/Data	3552.5 - 3697.5 MHz
NR Band n71	Data	665.5 - 695.5 MHz
NR Band n12	Data	701.5 - 713.5 MHz
NR Band n14	Data	790.5 - 795.5 MHz
NR Band n5 (Cell)	Data	826.5 - 846.5 MHz
NR Band n26 (Cell)	Data	816.5 - 846.5 MHz
NR Band n70	Data	1697.5 - 1707.5 MHz
NR Band n66 (AWS)	Data	1712.5 - 1777.5 MHz
NR Band n25 (PCS)	Data	1852.5 - 1912.5 MHz
NR Band n2 (PCS)	Data	1852.5 - 1907.5 MHz
NR Band n30	Data	2307.5 - 2312.5 MHz
NR Band n7	Data	2502.5 - 2567.5 MHz
NR Band n41	Data	2506.02 - 2679.99 MHz
NR Band n48	Data	3555.0 - 3694.98 MHz
NR Band n77 DoD	Data	3455.01 - 3544.98 MHz
NR Band n77 C	Data	3705 - 3975 MHz
2.4 GHz WLAN	Voice/Data	2412 - 2472 MHz
U-NII-1	Voice/Data	5180 - 5240 MHz
U-NII-2A	Voice/Data	5260 - 5320 MHz
U-NII-2C	Voice/Data	5500 - 5720 MHz
U-NII-3	Voice/Data	5745 - 5825 MHz
U-NII-5	Voice/Data	5955 - 6415 MHz
U-NII-6	Voice/Data	6435 - 6515 MHz
U-NII-7	Voice/Data	6535 - 6875 MHz
U-NII-8	Voice/Data	6895 - 7115 MHz
Bluetooth	Data	2402 - 2480 MHz
NB UNII-1	Voice/Data	5162 - 5245 MHz
NB UNII-3	Voice/Data	5733 - 5844 MHz

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1.2 Data Referencing

Band & Mode	Reference Model - BCGA2435	Variant Model - BCGA2761
UMTS 850	Fully Evaluated	Referenced
UMTS 1750	Fully Evaluated	Referenced
UMTS 1900	Fully Evaluated	Referenced
LTE Band 71	Fully Evaluated	Referenced
LTE Band 12	Fully Evaluated	Referenced
LTE Band 17	Fully Evaluated	Referenced
LTE Band 13	Fully Evaluated	Referenced
LTE Band 14	Fully Evaluated	Referenced
LTE Band 26 (Cell)	Fully Evaluated	Referenced
LTE Band 5 (Cell)	Fully Evaluated	Referenced
LTE Band 66 (AWS)	Fully Evaluated	Referenced
LTE Band 4 (AWS)	Fully Evaluated	Referenced
LTE Band 25 (PCS)	Fully Evaluated	Referenced
LTE Band 2 (PCS)	Fully Evaluated	Referenced
LTE Band 30	Fully Evaluated	Referenced
LTE Band 7	Fully Evaluated	Referenced
LTE Band 41	Fully Evaluated	Referenced
LTE Band 48	Fully Evaluated	Referenced
NR Band n71	Fully Evaluated	Referenced
NR Band n12	Fully Evaluated	Referenced
NR Band n14	Fully Evaluated	Referenced
NR Band n5 (Cell)	Fully Evaluated	Referenced
NR Band n26 (Cell)	Fully Evaluated	Referenced
NR Band n70	Fully Evaluated	Referenced
NR Band n66 (AWS)	Fully Evaluated	Referenced
NR Band n25 (PCS)	Fully Evaluated	Referenced
NR Band n2 (PCS)	Fully Evaluated	Referenced
NR Band n30	Fully Evaluated	Referenced
NR Band n7	Fully Evaluated	Referenced
NR Band n41	Fully Evaluated	Referenced
NR Band n48	Fully Evaluated	Referenced
NR Band n77 DoD	Fully Evaluated	Referenced
NR Band n77 C	Fully Evaluated	Referenced
2.4 GHz WLAN	Fully Evaluated	Referenced
U-NII-1	Fully Evaluated	Referenced
U-NII-2A	Fully Evaluated	Referenced
U-NII-2C	Fully Evaluated	Referenced
U-NII-3	Fully Evaluated	Referenced
U-NII-5	Fully Evaluated	Referenced
U-NII-6	Fully Evaluated	Referenced
U-NII-7	Fully Evaluated	Referenced
U-NII-8	Fully Evaluated	Referenced
Bluetooth	Fully Evaluated	Referenced
NB UNII-1	Fully Evaluated	Referenced
NB UNII-3	Fully Evaluated	Referenced

Per manufacturer declaration, there are two tablet devices FCC ID: BCGA2435 and FCC ID: BCGA2761, with high degree of similarity, reference model FCC ID: BCGA2435 and variant model FCC ID: BCGA2761. Both models share the same material, form factor, circuit design, and components, including antennas and their locations. The reference and variant models use the same material, form factor, circuit design, and components, including antennas and their locations. The reference and variant models use the same power tables and have same tune-up tolerances.

Per FCC Approved Data Referencing Test Plan, testing was done fully on the reference model FCC ID: BCGA2435, while spot-check verification has been performed on variant model FCC ID: BCGA2761. The reference and variant model comparison data summary is included in section 9. Please see RF exposure technical reports S/N 1C2205090025-26.BCG (Rev 2), S/N 1C2205090025-33.BCG, and 1C2305090017-02.BCG for complete compliance evaluation for the reference model.

Only operations relevant to this permissive change were evaluated for compliance. No other target changes have been made. Targets for all other bands/exposure conditions can be found in the original filing

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1.3 Time-Averaging Algorithm for RF Exposure Compliance

This device is enabled with the Qualcomm® Smart Transmit feature. This feature performs time averaging algorithm in real time to control and manage transmitting power and ensure the time-averaged RF exposure is in compliance with FCC requirements all the time. Refer to Compliance Summary document for detailed description of Qualcomm® Smart Transmit feature (report SN could be found in Section 1.11 – Bibliography).

Note that WLAN operations are not enabled with Smart Transmit.

The Smart Transmit algorithm maintains the time-averaged transmit power, in turn, time-averaged RF exposure of SAR design target, below the predefined time-averaged power limit (i.e., P_{limit} for sub-6 radio), for each characterized technology and band (see reference model RF Exposure Part 0 Test Report, report SN could be found in Section 1.11 - Bibliography).

Only operations relevant to this permissive change were evaluated for compliance. No other target changes have been made. Targets for all other bands/exposure conditions can be found in the original filing.

Exposure Scenario:	Ant 1 Body	Ant 1 Maximum Tune up Output Power*	Ant 2a/2b Body	Ant 2a/2b Maximum Tune up Output Power*	Ant 3 Body	Ant 3 Maximum Tune up Output Power*	Ant 4b Body	Ant 4b Maximum Tune up Output Power*	Manufacturer's Smart Transmit Uncertainty (dB)	Plimit target and UHB Pmax Tolerance (dB)
Averaging Volume:	1g		1g		1g		1g			
Spacing:	0 mm		0 mm		0 mm		0 mm			
DSI:	1		1		1		1			
Technology/Band	Plimit corresponding to 0.8 W/kg	Pmax	Plimit corresponding to 0.8 W/kg	Pmax	Plimit corresponding to 0.8 W/kg	Pmax	Plimit corresponding to 0.8 W/kg	Pmax		
NR Band n48	11.00	22.20	10.50	19.20	11.20	21.00	10.30	22.60	+/- 1.0	+/- 1.0

Smart Transmit allows the device to transmit at higher power instantaneously, as high as P_{max} , when needed, but enforces power limiting to maintain time-averaged transmit power to P_{limit} . Below table shows P_{limit} EFS settings and maximum tune up output power P_{max} configured for this EUT for various transmit conditions (Device State Index DSI). Note that the device uncertainty for sub-6GHz WWAN is +1.0/-1.0 dB for this EUT.

*Maximum tune up output power Pmax is used to configure EUT during RF tune up procedure. The maximum allowed output power is equal to maximum Tune up output power +/-1.0 dB tolerance for UHB.

*Note all P_{limit} EFS and maximum tune up output power P_{max} levels entered in above Table correspond to average power levels after accounting for duty cycle in the case of TDD modulation schemes (for e.g., LTE TDD).

1.4 Power Reduction for SAR

This device additionally utilizes a power reduction mechanism for Bluetooth and WLAN operations. When WLAN/Bluetooth is operating simultaneously with certain combinations of 3G/4G/5G and 5 GHz WLAN antennas, the output power of is permanently reduced. SAR evaluations were additionally performed at the maximum allowed output power for these scenarios to evaluate simultaneous transmission compliance.

Additionally, this device uses an independent mechanism that limits WIFI powers to a time-averaged output power. For the purposes of this test report, all SAR measurements were performed with the algorithm disabled at the maximum time-averaged output power level. See the original filing for all other operations that were not evaluated in this permissive change.

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1.5 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

Only operations relevant to this permissive change were evaluated for compliance. No other target changes have been made. Targets for all other bands/exposure conditions can be found in the original filing.

1.5.1 5G Output Power for Portable Use Conditions

Table 1-1
NR Bands

Mode / Band		Modulated Average Output Power (in dBm)			
		Ant 1	Ant 2a	Ant 3	Ant 4b
NR TDD Band n48 [Burst Averaged]	Max allowed power	12.00	11.50	12.20	11.30
	Nominal	11.00	10.50	11.20	10.30

Note: For NR TDD, the above powers listed are TDD burst average and framed average values.

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1.6 DUT Antenna Locations

The overall diagonal dimension of the device is > 200 mm. A diagram showing the location of the device antennas can be found in the Antenna Diagram and Test Setup Photos Appendix. Exact antenna dimensions and separation distances are shown in the Technical Descriptions in the FCC filings.

Note: See the original filing for all other operations that were not evaluated in this permissive change.

Table 1-2
Device Edges/Sides for SAR Testing

Mode	Back	Front	Top	Bottom	Right	Left
NR Band n48 Antenna 1	Yes	No	No	Yes	No	Yes
NR Band n48 Antenna 2a	Yes	No	No	Yes	Yes	No
NR Band n48 Antenna 3	Yes	No	Yes	No	Yes	No
NR Band n48 Antenna 4b	Yes	No	Yes	No	No	No

Note: Per FCC KDB Publication 616217 D04v01r01, particular edges were not required to be evaluated for SAR based on the SAR exclusion threshold in KDB 447498 D01V06. Additional edges may have been evaluated for simultaneous transmission analysis.

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1.7 Simultaneous Transmission Capabilities

According to FCC KDB Publication 447498 D01v06, transmitters are considered to be operating simultaneously when there is overlapping transmission, with the exception of transmissions during network hand-offs with maximum hand-off duration less than 30 seconds.

This device contains multiple transmitters that may operate simultaneously, and therefore requires a simultaneous transmission analysis according to FCC KDB Publication 447498 D01v06 4.3.2 procedures.

Table 1-3
Simultaneous Transmission Scenarios

No.	Capable Transmit Configuration	Body
1	Cellular Band + 2.4 GHz WIFI	Yes
2	Cellular Band + 5/6 GHz WIFI	Yes
3	Cellular Band + 2.4 GHz Bluetooth	Yes
4	Cellular Band+ 2.4 GHz WIFI MIMO	Yes
5	Cellular Band+ 5/6 GHz WIFI MIMO	Yes
6	Cellular Band + 2.4 GHz Bluetooth + 5/6 GHz WIFI	Yes
7	Cellular Band + 2.4 GHz Bluetooth + 5/6 GHz WIFI MIMO	Yes
8	2.4 GHz Bluetooth + 5/6 GHz WIFI	Yes
9	2.4 GHz Bluetooth + 5/6 GHz WIFI MIMO	Yes
10	Cellular Band + 2.4 GHz Bluetooth(TXBF) + 5/6 GHz WIFI	Yes
11	Cellular Band + 2.4 GHz Bluetooth(TXBF) + 5/6 GHz WIFI MIMO	Yes
12	2.4 GHz Bluetooth(TXBF) + 5/6 GHz WIFI	Yes
13	2.4 GHz Bluetooth (TXBF) + 5/6 GHz WIFI MIMO	Yes
14	Cellular Band + NB UNII	Yes
15	Cellular Band + NB UNII + 2.4 GHz WIFI	Yes
16	Cellular Band + NB UNII + 2.4 GHz WIFI MIMO	Yes
17	NB UNII + 2.4 GHz WIFI	Yes
18	NB UNII + 2.4 GHz WIFI MIMO	Yes
19	Cellular Band + NB UNII(TXBF) + 2.4 GHz WIFI	Yes
20	Cellular Band + NB UNII(TXBF) + 2.4 GHz WIFI MIMO	Yes
21	Cellular Band + NB UNII(TXBF)	Yes
22	Cellular Band + 2.4 GHz Bluetooth(TXBF)	Yes
23	NB UNII(TXBF) + 2.4 GHz WIFI	Yes
24	NB UNII(TXBF) + 2.4 GHz WIFI MIMO	Yes
25	2.4 GHz WIFI + 2.4 GHz Bluetooth	Yes
26	Cellular Band + 2.4 GHz WIFI + 2.4 GHz Bluetooth	Yes

Table 1-4
Simultaneous Transmission Scenarios of Inter-Band ULCA

No.	Capable Transmit Configuration	Body	Notes
1	Cellular Ant 1 LB + Cellular Ant 3 MB/HB	Yes	LTE Bands transmitting from Ant 1 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 3 MB/HB: LTE B2/4/7/66/30
2	Cellular Ant 1 LB + Cellular Ant 2b MB/HB	Yes	LTE Bands transmitting from Ant 1 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 2b MB/HB: LTE B2/4/7/66/30
3	Cellular Ant 1 LB + Cellular Ant 4b MB/HB	Yes	LTE Bands transmitting from Ant 1 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 4b MB/HB: LTE B2/4/7/66/30
4	Cellular Ant 3 LB + Cellular Ant 1 MB/HB	Yes	LTE Bands transmitting from Ant 3 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 1 MB/HB: LTE B2/4/7/66/30
5	Cellular Ant 3 LB + Cellular Ant 2b MB/HB	Yes	LTE Bands transmitting from Ant 3 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 2b MB/HB: LTE B2/4/7/66/30
6	Cellular Ant 3 LB + Cellular Ant 4b MB/HB	Yes	LTE Bands transmitting from Ant 3 LB: LTE B5/12/13/14 LTE Bands transmitting from Ant 4b MB/HB: LTE B2/4/7/66/30

Note: The technical description includes all the possible Inter-band ULCA combinations.

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Table 1-5
Simultaneous Transmission Scenarios with Inter-Band ULCA Active

No.	Capable Transmit Configuration	Body
1	LTE Inter-Band ULCA + 2.4 GHz WI-FI	Yes
2	LTE Inter-Band ULCA + 5/6 GHz WI-FI	Yes
3	LTE Inter-Band ULCA + 2.4 GHz Bluetooth	Yes
4	LTE Inter-Band ULCA + 2.4 GHz WI-FI MIMO	Yes
5	LTE Inter-Band ULCA + 5/6 GHz WI-FI MIMO	Yes
6	LTE Inter-Band ULCA + 2.4 GHz Bluetooth + 5/6 GHz WI-FI	Yes
7	LTE Inter-Band ULCA + 2.4 GHz Bluetooth + 5/6 GHz WI-FI MIMO	Yes
8	LTE Inter-Band ULCA + 2.4 GHz Bluetooth(TXBF) + 5/6 GHz WI-FI	Yes
9	LTE Inter-Band ULCA + 2.4 GHz Bluetooth(TXBF) + 5/6 GHz WI-FI MIMO	Yes
10	LTE Inter-Band ULCA + NB UNII	Yes
11	LTE Inter-Band ULCA + UNII NB + 2.4 GHz WI-FI	Yes
12	LTE Inter-Band ULCA + UNII NB + 2.4 GHz WI-FI MIMO	Yes
13	LTE Inter-Band ULCA + UNII NB(TXBF) + 2.4 GHz WI-FI	Yes
14	LTE Inter-Band ULCA + UNII NB(TXBF) + 2.4 GHz WI-FI MIMO	Yes
15	LTE Inter-Band ULCA + UNII NB(TXBF)	Yes
16	LTE Inter-Band ULCA + 2.4 GHz Bluetooth(TXBF)	Yes
17	LTE Inter-Band ULCA + 2.4 GHz WI-FI + 2.4 GHz Bluetooth	Yes

Note: LTE inter-band ULCA can operate in any of the combinations in Table 1-9

1. There are no limitations in the above listed simultaneous transmission scenarios between cellular antennas and BT/WI-FI antennas.
2. Wi-Fi 2.4GHz and Bluetooth 2.4 GHz can transmit simultaneously on separate antennas. 2.4 GHz WLAN Antenna 4a can only transmit simultaneously with 2.4GHz Bluetooth Antenna 2a. In this scenario Wi-Fi max power will not exceed minimum of (13.5dBm, SAR max cap, Reg max cap) power.
3. This device supports 2x2 MIMO Tx for WLAN 802.11a/g/n/ac/ax. 802.11a/g/n/ac/ax supports CDD and STBC and 802.11n/ac/ax additionally supports SDM. Each WLAN antenna can transmit independently or together when operating with MIMO.
4. EN-DC operation is supported with LTE + 5G NR FR1 scenarios. The LTE anchor bands are shown in the NR FR1 checklist.
5. This device supports VoWIFI.
6. This device supports VoLTE.

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1.8 Miscellaneous SAR Test Considerations

(A) WIFI/BT

There were no changes made to the WIFI and BT operations within this device. Please see original filing for complete evaluation of these operating modes.

(B) Licensed Transmitter(s)

NR implementation supports SA and NSA mode. In EN-DC mode, NR operates with the LTE Bands shown in the NR FR1 checklist acting as anchor bands. Per FCC guidance, SAR tests for NR Bands and LTE Anchors Bands were performed separately due to limitations in SAR probe calibration factors.

This device supports LTE/NR capabilities with overlapping transmission frequency ranges. When the supported frequency range of an LTE/NR Band falls completely within an LTE/NR band with a larger transmission frequency range, both LTE/NR bands have the same target power (or the band with the larger transmission frequency range has a higher target power), and both LTE/NR bands share the same transmission path and signal characteristics, SAR was only assessed for the band with the larger transmission frequency range.

Only operations relevant to this permissive change were evaluated for compliance. Please see original filing for complete evaluation for all other operating modes. The operational description includes a description of all changed items.

1.9 Guidance Applied

- FCC KDB Publication 447498 D01v06 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)
- FCC KDB Publication 616217 D04v01r02 (Tablet)

1.10 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 9.

1.11 Bibliography

Report Type	Report Serial Number
RF Exposure Part 0 Test Report	1C2305090017-03.BCG
Original RF Exposure Part 1 Test Report	Original Filing

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LTE Information					
Form Factor	Tablet Device				
Frequency Range of each LTE transmission band	LTE Band 71 (665.5 - 696.5 MHz)				
	LTE Band 12 (698.7 - 715.3 MHz)				
	LTE Band 17 (706.5 - 713.5 MHz)				
	LTE Band 13 (779.5 - 784.5 MHz)				
	LTE Band 14 (790.5 - 795.5 MHz)				
	LTE Band 26 (Cell) (814.7 - 848.3 MHz)				
	LTE Band 5 (Cell) (824.7 - 848.3 MHz)				
	LTE Band 66 (AWS) (1710.7 - 1779.3 MHz)				
	LTE Band 4 (AWS) (1710.7 - 1754.3 MHz)				
	LTE Band 25 (PCS) (1850.7 - 1914.3 MHz)				
	LTE Band 2 (PCS) (1850.7 - 1909.3 MHz)				
	LTE Band 30 (2307.5 - 2312.5 MHz)				
	LTE Band 7 (2502.5 - 2567.5 MHz)				
	LTE Band 41 (2498.5 - 2687.5 MHz)				
	LTE Band 48 (3532.5 - 3697.5 MHz)				
	LTE Band 71: 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 12: 1.4 MHz, 3 MHz, 5 MHz, 10 MHz				
	LTE Band 17: 5 MHz, 10 MHz				
	LTE Band 13: 5 MHz, 10 MHz				
	LTE Band 14: 5 MHz, 10 MHz				
Channel Bandwidths	LTE Band 26 (Cell): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz				
	LTE Band 5 (Cell): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz				
	LTE Band 66 (AWS): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 4 (AWS): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 25 (PCS): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 2 (PCS): 1.4 MHz, 3 MHz, 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 30: 5 MHz, 10 MHz				
	LTE Band 7: 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 41: 5 MHz, 10 MHz, 15 MHz, 20 MHz				
	LTE Band 48: 5 MHz, 10 MHz, 15 MHz, 20 MHz				
Channel Numbers and Frequencies (MHz)	Low	Low-Mid	Mid	Mid-High	High
LTE Band 71: 5 MHz	665.5 (133147)	680.5 (133297)	695.5 (133447)		
LTE Band 71: 10 MHz	668 (133172)	680.5 (133297)	693 (133422)		
LTE Band 71: 15 MHz	670.5 (133197)	680.5 (133297)	690.5 (133397)		
LTE Band 71: 20 MHz	673 (133222)	680.5 (133297)	688 (133372)		
LTE Band 12: 1.4 MHz	699.7 (23017)	707.5 (23095)	715.3 (23173)		
LTE Band 12: 3 MHz	700.5 (23025)	707.5 (23095)	714.5 (23165)		
LTE Band 12: 5 MHz	701.5 (23035)	707.5 (23095)	713.5 (23155)		
LTE Band 12: 10 MHz	704 (23060)	707.5 (23095)	711 (23130)		
LTE Band 17: 5 MHz	706.5 (23755)	710 (23790)	713.5 (23825)		
LTE Band 17: 10 MHz	709 (23780)	710 (23790)	711 (23800)		
LTE Band 13: 5 MHz	779.5 (23205)	782 (23230)	784.5 (23255)		
LTE Band 13: 10 MHz	N/A	782 (23230)	N/A		
LTE Band 14: 5 MHz	790.5 (23305)	793 (23330)	795.5 (23355)		
LTE Band 14: 10 MHz	N/A	793 (23330)	N/A		
LTE Band 26 (Cell): 1.4 MHz	814.7 (26997)	831.5 (26865)	848.3 (27033)		
LTE Band 26 (Cell): 3 MHz	815.5 (26705)	831.5 (26865)	847.5 (27025)		
LTE Band 26 (Cell): 5 MHz	816.5 (26715)	831.5 (26865)	846.5 (27015)		
LTE Band 26 (Cell): 10 MHz	819 (26740)	831.5 (26865)	844 (26990)		
LTE Band 5 (Cell): 1.4 MHz	824.7 (20407)	836.5 (20525)	848.3 (20643)		
LTE Band 5 (Cell): 3 MHz	825.5 (20415)	836.5 (20525)	847.5 (20635)		
LTE Band 5 (Cell): 5 MHz	826.5 (20425)	836.5 (20525)	846.5 (20625)		
LTE Band 5 (Cell): 10 MHz	829 (20450)	836.5 (20525)	844 (20600)		
LTE Band 66 (AWS): 1.4 MHz	1710.7 (131979)	1745 (132322)	1779.3 (132665)		
LTE Band 66 (AWS): 3 MHz	1711.5 (131987)	1745 (132322)	1778.5 (132657)		
LTE Band 66 (AWS): 5 MHz	1712.5 (131997)	1745 (132322)	1777.5 (132647)		
LTE Band 66 (AWS): 10 MHz	1715 (132022)	1745 (132322)	1775 (132622)		
LTE Band 66 (AWS): 15 MHz	1717.5 (132047)	1745 (132322)	1772.5 (132597)		
LTE Band 66 (AWS): 20 MHz	1720 (132072)	1745 (132322)	1770 (132572)		
LTE Band 4 (AWS): 1.4 MHz	1710.7 (19957)	1732.5 (20175)	1754.3 (20393)		
LTE Band 4 (AWS): 3 MHz	1711.5 (19965)	1732.5 (20175)	1753.5 (20385)		
LTE Band 4 (AWS): 5 MHz	1712.5 (19975)	1732.5 (20175)	1752.5 (20375)		
LTE Band 4 (AWS): 10 MHz	1715 (20000)	1732.5 (20175)	1750 (20350)		
LTE Band 4 (AWS): 15 MHz	1717.5 (20025)	1732.5 (20175)	1747.5 (20325)		
LTE Band 4 (AWS): 20 MHz	1720 (20050)	1732.5 (20175)	1745 (20300)		
LTE Band 25 (PCS): 1.4 MHz	1850.7 (26047)	1882.5 (26365)	1914.3 (26683)		
LTE Band 25 (PCS): 3 MHz	1851.5 (26055)	1882.5 (26365)	1913.5 (26675)		
LTE Band 25 (PCS): 5 MHz	1852.5 (26065)	1882.5 (26365)	1912.5 (26665)		
LTE Band 25 (PCS): 10 MHz	1855 (26090)	1882.5 (26365)	1910 (26640)		
LTE Band 25 (PCS): 15 MHz	1857.5 (26115)	1882.5 (26365)	1907.5 (26615)		
LTE Band 25 (PCS): 20 MHz	1860 (26140)	1882.5 (26365)	1905 (26590)		
LTE Band 2 (PCS): 1.4 MHz	1850.7 (18607)	1880 (18900)	1909.3 (19193)		
LTE Band 2 (PCS): 3 MHz	1851.5 (18615)	1880 (18900)	1908.5 (19185)		
LTE Band 2 (PCS): 5 MHz	1852.5 (18625)	1880 (18900)	1907.5 (19175)		
LTE Band 2 (PCS): 10 MHz	1855 (18650)	1880 (18900)	1905 (19150)		
LTE Band 2 (PCS): 15 MHz	1857.5 (18675)	1880 (18900)	1902.5 (19125)		
LTE Band 2 (PCS): 20 MHz	1860 (18700)	1880 (18900)	1900 (19100)		
LTE Band 30: 5 MHz	2307.5 (27895)	2310 (27710)	2312.5 (27735)		
LTE Band 30: 10 MHz	N/A	2310 (27710)	N/A		
LTE Band 7: 5 MHz	2502.5 (20775)	2535 (21100)	2567.5 (21425)		
LTE Band 7: 10 MHz	2505 (20800)	2535 (21100)	2565 (21400)		
LTE Band 7: 15 MHz	2507.5 (20825)	2535 (21100)	2562.5 (21375)		
LTE Band 7: 20 MHz	2510 (20850)	2535 (21100)	2560 (21350)		
LTE Band 41: 5 MHz	2506 (39750)	2549.5 (40185)	2593 (40620)	2636.5 (41055)	2680 (41490)
LTE Band 41: 10 MHz	2506 (39750)	2549.5 (40185)	2593 (40620)	2636.5 (41055)	2680 (41490)
LTE Band 41: 15 MHz	2506 (39750)	2549.5 (40185)	2593 (40620)	2636.5 (41055)	2680 (41490)
LTE Band 41: 20 MHz	2506 (39750)	2549.5 (40185)	2593 (40620)	2636.5 (41055)	2680 (41490)
LTE Band 48: 5 MHz	3552.5 (55265)	3600.8 (55748)	N/A	3649.2 (56232)	3697.5 (56715)
LTE Band 48: 10 MHz	3555 (55290)	3601.7 (55757)	N/A	3648.3 (56223)	3695 (56690)
LTE Band 48: 15 MHz	3557.5 (55315)	3602.8 (55768)	N/A	3647.5 (56215)	3692.5 (56665)
LTE Band 48: 20 MHz	3560 (55340)	3603.3 (55773)	N/A	3646.7 (56207)	3690 (56640)
UE Category	DL UE Cat 20 (QPSK, 16QAM, 64QAM, 256 QAM) , UL UE Cat 18 (QPSK, 16QAM, 64QAM, 256QAM)				
Modulations Supported in UL	QPSK, 16QAM, 64QAM, 256QAM				
LTE MPR Permanently implemented per 3GPP TS 36.101 section 6.2.3-6.2.57 (manufacturer attestation to be provided)	YES				
A-MPR (Additional MPR) disabled for SAR Testing?	YES				
LTE Carrier Aggregation Possible Combinations	The technical description includes all the possible carrier aggregation combinations				
LTE Additional Information	This device does not support full CA features on 3GPP Release 15. All uplink communications are identical to the Release 8 Specifications. Relay communications are done on the PCC. The following LTE Release 15 Features are not supported: Relay, HetNet, Enhanced MIMO, eICIC, WiFi Offloading, eMBMS, Cross-Carrier Scheduling, Enhanced SC-FDMA.				

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3 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields,” Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

3.1 SAR Definition

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 3-1).

Equation 3-1
SAR Mathematical Equation

$$SAR = \frac{d}{dt} \left(\frac{dU}{dm} \right) = \frac{d}{dt} \left(\frac{dU}{\rho dv} \right)$$

SAR is expressed in units of Watts per Kilogram (W/kg).

$$SAR = \frac{\sigma \cdot E^2}{\rho}$$

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m³)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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4 DOSIMETRIC ASSESSMENT

4.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 4-1) and IEEE 1528-2013.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 4-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):
 - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 4-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

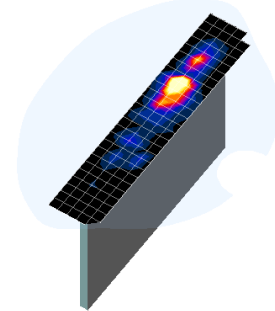


Figure 4-1
Sample SAR Area Scan

Table 4-1
Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{\text{area}}, \Delta y_{\text{area}}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid	Graded Grid		
			$\Delta z_{\text{zoom}}(n)$	$\Delta z_{\text{zoom}}(1)^*$	$\Delta z_{\text{zoom}}(n>1)^*$	
≤2 GHz	≤15	≤8	≤5	≤4	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥30
2-3 GHz	≤12	≤5	≤5	≤4	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥30
3-4 GHz	≤12	≤5	≤4	≤3	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥28
4-5 GHz	≤10	≤4	≤3	≤2.5	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥25
5-6 GHz	≤10	≤4	≤2	≤2	≤1.5* $\Delta z_{\text{zoom}}(n-1)$	≥22

*Also compliant to IEEE 1528-2013 Table 6

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5 TEST CONFIGURATION POSITIONS

5.1 Device Holder

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

5.2 SAR Testing for Tablet per KDB Publication 616217 D04v01r02

Per FCC KDB Publication 616217 D04v01r02, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. The SAR Exclusion Threshold in KDB 447498 D01v06 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.

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6 RF EXPOSURE LIMITS

6.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

6.2 Controlled Environment

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 6-1
SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
Peak Spatial Average SAR Head	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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7 FCC MEASUREMENT PROCEDURES

7.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

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8 SYSTEM VERIFICATION

8.1 Tissue Verification

Table 8-1
Measured Tissue Properties

Calibrated for Tests Performed on	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ	Target Conductivity, σ (s/M)	Target Dielectric Constant, ϵ	% dev σ	% dev ϵ
06/05/2023	3600 Head	22	3300	2.656	38.700	2.708	38.157	-1.92%	1.42%
			3350	2.704	38.635	2.759	38.100	-1.99%	1.40%
			3450	2.794	38.471	2.861	37.986	-2.34%	1.28%
			3500	2.839	38.360	2.913	37.929	-2.54%	1.14%
			3550	2.883	38.285	2.964	37.871	-2.73%	1.09%
			3560	2.893	38.262	2.974	37.860	-2.72%	1.06%
			3600	2.935	38.204	3.015	37.814	-2.65%	1.03%
			3650	2.975	38.107	3.066	37.757	-2.97%	0.93%
			3690	3.018	38.052	3.107	37.711	-2.86%	0.90%
			3700	3.026	38.034	3.117	37.700	-2.92%	0.89%
			3750	3.071	37.949	3.169	37.643	-3.09%	0.81%
			3900	3.226	37.711	3.323	37.471	-2.92%	0.64%
			3930	3.249	37.676	3.353	37.437	-3.10%	0.64%
			4100	3.431	37.386	3.528	37.243	-2.75%	0.38%
			4150	3.487	37.319	3.579	37.186	-2.57%	0.36%

The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Note: Per April 2019 TCB Workshop Notes, single head-tissue simulating liquid specified in IEC 62209-1 is permitted to use for all SAR tests.

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8.2 Test System Verification

Test System Verification

Prior to SAR assessment, the system is verified to +/- 10% of the SAR measurement on the reference dipole at the time of calibration by the calibration facility.

Table 8-2
System Verification Results – 1g

SAR System	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp. (C)	Liquid Temp. (C)	Input Power (W)	Source SN	Probe SN	Measured SAR1g (W/kg)	1W Target SAR1g (W/kg)	1W Normalized SAR 1g (W/kg)	Deviation1g (%)
AM6	3500	HEAD	06/05/2023	20.1	22.0	0.10	1126	7638	6.900	67.00	69.000	2.99%
AM6	3700	HEAD	06/05/2023	20.1	22.0	0.10	1097	7638	6.620	68.10	66.200	-2.79%

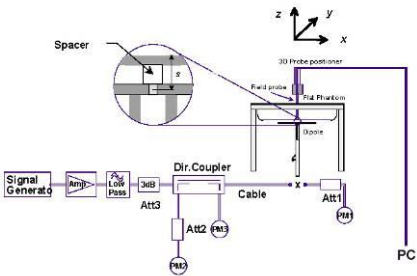


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

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9.1 Standalone Body SAR Data

Table 9-1
CBE Spot-check Verification for Data Referencing

MEASUREMENT RESULTS																						
FREQUENCY			Mode	Bandwidth [MHz]	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Power Drift [dB]	MPR [dB]	Antenna Config.	Device Serial Number	Modulation	RB Size	RB Offset	Spacing	Side	Duty Cycle	SAR (1g)	Scaling Factor	Reported SAR (1g)	SAR (10g)	Reported SAR (10g)	Reported SAR for Reference Model (1g)
MHz	Ch.																(W/kg)		(W/kg)	(W/kg)	(W/kg)	(W/kg)
3570.00	638000	Low	NR Band N48	40	11.50	10.93	-0.10	0	Ant.2a	LGWYDQC7TL	QPSK	100	0	0 mm	right	1:1	0.820	1.140	0.935	0.239	0.272	0.945
ANSI / IEEE C95.1 1992 - SAFETY LIMIT								Body														
Spatial Peak								1.6 W/kg (mW/g)														
Uncontrolled Exposure/General Population								averaged over 1 gram														

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in FCC KDB Publication 616217 D04v01r02 and FCC KDB Publication 447498 D01v06.
2. Batteries are fully charged at the beginning of the SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
6. FCC KDB Publication 616217 D04v01r02 Section 4.3, SAR tests are required for the back surface and edges of the tablet with the tablet touching the phantom. The SAR Exclusion Threshold in FCC KDB 447498 D01v06 was applied to determine SAR test exclusion for adjacent edge configurations.
7. This device is the depopulated version of the fully populated reference model FCC ID: BCGA2435. The worst-case configurations of reference model for each equipment class and antenna was selected for spot-check verification with the variant model. The spot-check verification results showed negligible impact of RF exposure from the depopulation therefore, the RF exposure data was referenced based on the reference model test results
8. See the original filing for all other operations that were not evaluated in this permissive change.

NR Notes:

1. NR implementation supports SA and NSA modes. NR implementation in EN-DC mode operates with the LTE Bands shown in the NR FR1 checklist acting as anchor bands. Per FCC guidance, SAR tests for NR Bands and LTE Anchors Bands were performed separately due to limitations in SAR probe calibration factors.
2. Due to test setup limitations, SAR testing for NR was performed using test mode software to establish the connection.
3. This device additionally supports some EN-DC conditions where additional LTE carriers are added on the downlink only.
4. Per FCC Guidance, NR modulations and RB Sizes/Offsets were selected for testing such that configurations with the highest output power were evaluated for SAR tests.

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10 FCC MULTI-TX AND ANTENNA SAR CONSIDERATIONS

10.1 Introduction

The following procedures adopted from FCC KDB Publication 447498 D01v06 are applicable to devices with built-in unlicensed transmitters such as 802.11 and Bluetooth devices which may simultaneously transmit with the licensed transmitter.

10.2 Simultaneous Transmission Procedures

This device contains transmitters that may operate simultaneously. Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication 447498 D01v06 4.3.2 and IEEE 1528-2013 Section 6.3.4.1.2, simultaneous transmission SAR test exclusion may be applied when the sum of the 1g SAR for all the simultaneous transmitting antennas in a specific physical test configuration is ≤ 1.6 W/kg. The different test positions in an exposure condition may be considered collectively to determine SAR test exclusion according to the sum of 1g or 10g SAR.

Please see complete compliance evaluation of reference FCC ID BCGA2435 in RF Exposure Technical Report S/N: 1C2205090025-26.BCG (Rev 2), S/N 1C2205090025-33.BCG, and 1C2305090017-02.BCG for standalone reported SAR for models and bands not evaluated for variant models.

10.3 Simultaneous Transmission Conclusion

The above numerical summed SAR results for all the worst-case simultaneous transmission conditions were below the SAR limit. Therefore, the above analysis is sufficient to determine that simultaneous transmission cases will not exceed the SAR limit and therefore no measured volumetric simultaneous SAR summation is required per FCC KDB Publication 447498 D01v06 and IEEE 1528-2013 Section 6.3.4.1.2.

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11 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	8753ES	S-Parameter Vector Network Analyzer	6/14/2022	Annual	6/14/2023	US39170118
Agilent	E4438C	ESG Vector Signal Generator	1/18/2023	Annual	1/18/2024	MY47270002
Agilent	N5182A	MXG Vector Signal Generator	7/4/2022	Annual	7/4/2023	MY48180366
Agilent	SMF100A	Signal Generator	3/28/2022	Biennial	3/28/2024	101590
Agilent	N9020A	MXA Signal Analyzer	3/15/2023	Annual	3/15/2024	US46470561
Amplifier Research	1551G6	Amplifier	CBT	N/A	CBT	343972
Amplifier Research	1551G6	Amplifier	CBT	N/A	CBT	343971
Anritsu	MA24106A	USB Power Sensor	2/9/2023	Annual	2/9/2024	1520505
Control Company	4040	Therm./Clock/Humidity Monitor	3/27/2023	Biennial	3/27/2025	230208311
Control Company	4353	Long Stem Thermometer	10/21/2022	Annual	10/21/2023	200645912
Insize	1108-150	Digital Caliper	4/5/2022	Biennial	4/5/2024	409193536
Keysight Technologies	N9030A	3Hz-44GHz PXA Signal Analyzer	8/18/2022	Annual	8/18/2023	MY49430494
MCL	BW-N10W5+	10dB Attenuator	CBT	N/A	CBT	1611
MCL	BW-N3W5+	3dB Attenuator	CBT	N/A	CBT	1812
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1311
Mini-Circuits	VLF-6000+	Low Pass Filter	CBT	N/A	CBT	N/A
Mini-Circuits	ZHDC-16-63-S+	50-6000MHz Bidirectional Coupler	CBT	N/A	CBT	N/A
MiniCircuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Pasternack	PE2208-6	Bidirectional Coupler	CBT	N/A	CBT	N/A
Rohde & Schwarz	NRX	Power Meter	1/11/2023	Annual	1/11/2024	102583
Huber + Suhner	74Z-0-0-21	Torque Wrench	4/6/2022	Biennial	4/6/2024	83881
SPEAG	DAKS-3.5	Portable DAK	9/19/2022	Annual	9/19/2023	1045
SPEAG	D3500V2	3500 MHz SAR Dipole	6/9/2021	Biennial	6/9/2023	1126
SPEAG	D3700V2	3700 MHz SAR Dipole	10/21/2022	Annual	10/21/2023	1097
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/13/2023	Annual	3/13/2024	1408
SPEAG	EX3DV4	SAR Probe	3/16/2023	Annual	3/16/2023	7638
SPEAG	MAIA	Modulation and Audio Interference Analyzer	CBT	N/A	CBT	1601

*All equipment was used solely within its respective calibration period

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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12 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E.2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.73	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.73	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.73	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.73	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.73	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.73	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.73	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.73	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.73	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.73	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.73	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.73	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Uncertainty	E.3.4	0.6	R	1.73	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)							RSS	12.2	12.0
Expanded Uncertainty (95% CONFIDENCE LEVEL)							k=2	24.4	24.0

The above measurement uncertainties are according to IEEE Std. 1528-2013

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13 CONCLUSION

13.1 Measurement Conclusion

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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