

ELEMENT MATERIALS TECHNOLOGY

(Formerly PCTEST) 18855 Adams Court, Morgan Hill, CA 95037, USA Tel. 408.538.5600 http://www.element.com



SAR EVALUATION REPORT

Applicant Name: Apple Inc.

One Apple Park Way Cupertino, CA 95014 USA Date of Testing: 09/05/2023 Test Report Issue Date: 10/06/2023 Test Site/Location: Element Materials Technology Morgan Hill, CA, USA Document Serial No.: 1C2308180043-01.BCG (Rev 3)

FCC ID:

BCGA3085

APPLICANT:

APPLE, INC.

DUT Type: Application Type: FCC Rule Part(s): Model: Stylus Pen Certification CFR §2.1093 A3085

Equipment	Band & Mode	Tx Frequency	SAR	
Class	Danu & Moue	TXTTEquency	1g Body (W/kg)	
DTS	Bluetooth LE	2402 - 2480 MHz	0.16	

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.

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 1.6 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.







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@mwfai.info.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 1 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 10121

TABLE OF CONTENTS

1	DEVICE	UNDER TEST	3
2	INTROD	JCTION	5
3	DOSIME	TRIC ASSESSMENT	6
4	TEST CO	ONFIGURATION POSITIONS	7
5	RF EXPO	DSURE LIMITS	8
6	FCC MEA	SUREMENT PROCEDURES	9
7	RF CON	DUCTED POWERS 1	0
8	SYSTEM	VERIFICATION 1	2
9	SAR DAT	TA SUMMARY 1	4
10	MEASUR	EMENT VARIABILITY 1	6
11	EQUIPM	ENT LIST 1	7
12	MEASUR	EMENT UNCERTAINTIES 1	8
13	CONCLU	ISION 1	9
14	REFERE	NCES 2	0
APPEN	IDIX A:	SAR TEST PLOTS	
APPEN	IDIX B:	SAR DIPOLE VERIFICATION PLOTS	
APPEN	IDIX C:	PROBE AND DIPOLE CALIBRATION CERTIFICATES	
APPEN	IDIX D:	SAR TISSUE SPECIFICATIONS	
APPEN	IDIX E:	SAR SYSTEM VALIDATIONS	
APPEN	IDIX F:	DUT ANTENNA DIAGRAM & SAR TEST SETUP PHOTOGRAPHS	

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 2 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 2 01 21

1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
Bluetooth LE	Data	2402 - 2480 MHz

1.2 Power Reduction for SAR

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

1.3 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 D04v01.

1.3.1 Maximum Output Power

Mode / Band	Modulated Average (dBm)		
2.4 Plusteeth LF	Maximum	5.00	
2.4 Bluetooth LE	Nominal	4.00	

1.4 DUT Antenna Locations

Based on the expected use conditions and conservative SAR test conditions, Body SAR was evaluated. The antenna is located inside BCGA3085 – which is a stylus pen. A diagram showing the location of the device antenna can be found in DUT Antenna Diagram and SAR Test Setup Photographs Appendix.

1.5 Simultaneous Transmission Capabilities

This Device does not support any Simultaneous transmission Scenarios.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 3 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 5 01 21

1.6 Guidance Applied

- FCC KDB Publication 447498 D04v01 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)

1.7 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.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 4 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	

2 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.

2.1 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 2-1).

Equation 2-1 SAR Mathematical Equation

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

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]

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 5 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 5 01 21

3 DOSIMETRIC ASSESSMENT

3.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04. Also compliant to IEEE 1528-2013 Table 6.

- 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 3-1) 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.

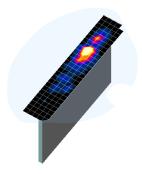


Figure 3-1 Sample SAR Area Scan

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 3-1) 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 cDASY6 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 3-1. 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 ($10 \times 10 \times 10$) 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.

-	Maximum Area Scan Resolution (mm)	Maximum Zoom Scan Resolution (mm)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan
Frequency	(Δx _{area} , Δy _{area})	(Δx _{200m} , Δy _{200m})	Uniform Grid	G	raded Grid	Volume (mm) (x,y,z)
	a alcar yalcay		∆z _{zoom} (n)	$\Delta z_{zoom}(1)^*$	Δz _{zoom} (n>1)*	
≤2 GHz	≤ 15	≤8	≤ 5	≤4	$\leq 1.5^*\Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤12	≤5	≤5	≤4	$\leq 1.5^*\Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤12	≤5	≤ 4	≤3	$\leq 1.5^*\Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤4	≤3	≤2.5	≤ 1.5*∆z _{zoom} (n-1)	≥ 25
5-6 GHz	≤ 10	≤4	≤2	≤2	$\leq 1.5^*\Delta z_{zoom}(n-1)$	≥ 22

Table 3-1 Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

*Also compliant to IEEE 1528-2013 Table 6

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 6 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 0 01 21

4 TEST CONFIGURATION POSITIONS

4.1 Device Holder

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

4.2 Body Exposure Conditions

Devices containing one or more wireless transmitters or transceivers with intended use that includes transmitting with any portion of the device being held directly against a user's body. The DUT was evaluated with a separation distance of 0 mm between all six sides of the device and the flat phantom. Due to the circular shape of the device, the top flat surface of the device where the antenna is closest to was first evaluated. Then, other surfaces were also tested at 90 degree rotations from that side. The phantom is filled with head tissue equivalent medium.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 7 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage / 0121

5 RF EXPOSURE LIMITS

5.1 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.

5.2 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.

HUMAN EXPOSURE LIMITS									
	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Occupational (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							

Table 5-1 SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

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.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 8 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Faye 0 01 21	

6 MEASUREMENT PROCEDURES

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D04v01, 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.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 9 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Page 9 01 21	

7 RF CONDUCTED POWERS

7.1 Bluetooth Conducted Powers

F	2.4 GHz Blu	Data	Channel	Avg Conducted Power		
Frequency [MHz]	Modulation	Rate [Mbps]	No.	[dBm]	[mW]	
2402	GFSK	1.0	0	3.56	2.270	
2440	GFSK	1.0	19	3.49	2.234	
2480	GFSK	1.0	39	3.41	2.193	

Table 7-1 2.4 GHz Bluetooth Average RF Powe

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 10 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Page 10 of 21	

7.2 Bluetooth Duty Cycle

7.2.1 Maximum Bluetooth Transmission

10.0	Keysight Spectrun								
IFGain:Low Atten: 10 dB Detriction Indextart Ref 0.00 dBm Indextart Indextart <th>XU F</th> <th>RF 50 Ω</th> <th>AC</th> <th>PNO: Fast</th> <th></th> <th>A</th> <th>vg Type: Log-Pwr</th> <th>TRACE 1 2 3 4 5 TYPE WWWW</th> <th>6 Marker</th>	XU F	RF 50 Ω	AC	PNO: Fast		A	vg Type: Log-Pwr	TRACE 1 2 3 4 5 TYPE WWWW	6 Marker
0.0 EV.div Ref 0.00 dBm 0.0 Image: display in the second								DETPNNNN	Marker Tabl
All Markers		ef () ()() d	Bm						<u>On</u> Of
200 200 400 400 400 400 400 400	-og								Marker Count
40 0									[Off]
S00 Mark Senter 2.440000000 GHz Span 0 Hz S00 Y S00 Mark S00 Mar									Coup
700									Marker
NO.0 Span 0 Hz Senter 2.440000000 GHz Span 0 Hz Stenter 2.440000000 GHz Span 0 Hz Stenter 2.440000000 GHz Span 0 Hz Reverse BW 3.0 MHz VBW 3.0 MHz Y FUNCTION FUNCTION FUNCTION WDTH FUNCTION FUNCTION WDTH FUNCTION FUNCTION WDTH FUNCTION FUNCTION WDTH FUNCTION FUNCTION MODE FUNCTION FUNCTION FUNCTION WDTH FUNCTION FUNCTION WDTH FUNCTION FUNCTION MODE FUNCTION FUNCTION FUNCTION WDTH FUNCTION FUNCTION MODE FUNCTION FUNCTION FUNCTION									
Senter 2.440000000 GHz Span 0 Hz tes BW 3.0 MHz VBW 3.0 MHz Sweep 1.000 ms (1001 pts) Image: Senter 2.440000000 GHz Y FUNCTION FUNCTION width Image: Senter 2.440000000 GHz Y FUNCTION FUNCTION width FUNCTION value Image: Senter 2.4400000000 GHz Y FUNCTION FUNCTION width FUNCTION value FUNCTION width Image: Senter 2.4400000000 GHz Y FUNCTION FUNCTION width FUNCTION value FUNCTION Image: Senter 2.4400000000 GHz Y FUNCTION FUNCTION width FUNCTION width FUNCTION Image: Senter 2.4400000000 GHz Y FUNCTION FUNCTION FUNCTION Image: Senter 2.4400000000000000000000000000000000000	30.0								
Res BW 3.0 MHz VBW 3.0 MHz Sweep 1.000 ms (1001 pts) 1 Y FUNCTION FUNCTION WIDTH FUNCTION VALUE All Markers 1 Y FUNCTION FUNCTION WIDTH FUNCTION VALUE MIX	90.0								
1 Image: Constraint of the second s			GHz	VB	W 3.0 MHz		Sweep	Span 0 H 1.000 ms (1001 pts	z S)
3 All Markers 6 Image: Sector		5L	Х		Y	FUNCTION	FUNCTION WIDTH	H FUNCTION VALUE	
	3								All Markers O
	5								
	8								Mo
	10								2 of
III STATUS					III		STAT	10	

Figure 7-1 2.4 GHz Bluetooth Transmission Plot

Equation 7-1 2.4 GHz Bluetooth Duty Cycle Calculation

Duty Cycle = 100%

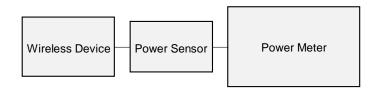


Figure 7-2 Power Measurement Setup

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 11 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage IT 0121

SYSTEM VERIFICATION 8

Tissue Verification 8.1

	Measured Head 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		
			2300	1.744	40.544	1.670	39.500	4.43%	2.64%		
			2310	1.751	40.526	1.679	39.480	4.29%	2.65%		
			2320	1.759	40.508	1.687	39.460	4.27%	2.66%		
			2400	1.823	40.392	1.756	39.289	3.82%	2.81%		
			2450	1.864	40.291	1.800	39.200	3.56%	2.78%		
			2480	1.889	40.251	1.833	39.162	3.06%	2.78%		
			2500	1.903	40.215	1.855	39.136	2.59%	2.76%		
09/05/2023	2450 Head	20.5	2510	1.910	40.194	1.866	39.123	2.36%	2.74%		
			2535	1.931	40.145	1.893	39.092	2.01%	2.69%		
			2550	1.944	40.121	1.909	39.073	1.83%	2.68%		
			2560	1.953	40.108	1.920	39.060	1.72%	2.68%		
			2600	1.986	40.048	1.964	39.009	1.12%	2.66%		
			2650	2.026	39.973	2.018	38.945	0.40%	2.64%		
			2680	2.052	39.925	2.051	38.907	0.05%	2.62%		
			2700	2.069	39.890	2.073	38.882	-0.19%	2.59%		

Table 8-1

The above measured tissue parameters were used in the cDASY6 software. The cDASY6 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). 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.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 12 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 12 01 21	

Test System Verification

Prior to SAR assessment, the system is verified to $\pm 10\%$ of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in SAR System Validation Appendix.

Table 8-2

	System Verification Results – 1g											
	System Verification TARGET & MEASURED											
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 (%)
AM9	2450	HEAD	09/05/2023	20.0	20.3	0.10	921	7427	5.160	54.20	51.600	-4.80%

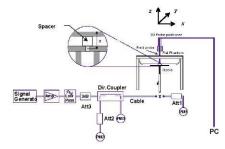


Figure 8-1 System Verification Setup Diagram



Figure 8-2 System Verification Setup Photo

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 13 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Page 13 01 21	

9 SAR DATA SUMMARY

9.1 Standalone Body SAR Data

Table 9-1 Bluetooth 2450 Body SAR

	MEASUREMENT RESULTS																		
FREQ	JENCY	Mode	Service	Maximum Allowed	Conducted	Power Drift	Side	Spacing	Device Serial Number	Data Rate	Duty Cycle	SAR (1g)	Scaling Factor	Scaling Factor (Duty Cycle)	Factor Scaling Factor	Reported SAR (1g)	SAR (10g)	Reported SAR (10g)	Plot #
MHz	Ch.			Power [dBm]	Power [dBm]	[dB]				(Mbps)	(%)	(W/kg)	(Power)		(W/kg)	(W/kg)	(W/kg)		
2402.00	0	Bluetooth	DHSS	5.00	3.56	-0.01	back	0 mm	JPMHW22DY4	1	100	0.002	1.393	1.000	0.003	0.002	0.003		
2402.00	0	Bluetooth	DHSS	5.00	3.56	0.00	front	0 mm	JPMHW22DY4	1	100	0.003	1.393	1.000	0.004	0.002	0.003		
2402.00	0	Bluetooth	DHSS	5.00	3.56	0.00	top	0 mm	JPMHW22DY4	1	100	0.112	1.393	1.000	0.156	0.037	0.052	A1	
2402.00	0	Bluetooth	DHSS	5.00	3.56	0.10	bottom	0 mm	JPMHW22DY4	1	100	0.014	1.393	1.000	0.020	0.005	0.007		
2402.00	0	Bluetooth	DHSS	5.00	3.56	0.02	left	0 mm	JPMHW22DY4	1	100	0.087	1.393	1.000	0.121	0.028	0.039		
2402.00	0	Bluetooth	DHSS	5.00	3.56	-0.06	right	0 mm	JPMHW22DY4	1	100	0.047	1.393	1.000	0.065	0.016	0.022		
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT					Body													
		Uncontrollo		al Peak Ire/General Popu	lation		1.6 W/kg (mW/g) averaged over 1 gram												
		Uncontrolle	u Exposi	re/General Popu	lation			-				avera	ged over i gran	1					

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 14 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 14 01 21	

9.2 SAR Test Notes

General Notes:

- 1. Batteries are fully charged at the beginning of the SAR measurements.
- 2. Liquid tissue depth was at least 15.0 cm for all frequencies.
- 3. 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.
- 4. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01 and IEEE 1528-2013.
- 5. SAR testing was performed on a flat phantom filled with head tissue equivalent medium.
- 6. Body SAR was evaluated as a conservative SAR test condition for the stylus pen (BCGA3085).
- 7. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg.
- 8. The orange highlights throughout the report represent the highest scaled SAR per Equipment class.
- 9. The DUT was evaluated with a separation distance of 0 mm between all six sides of the device and the flat phantom. Due to the circular shape of the device, the top flat surface of the device where the antenna is closest to was first evaluated. Then, other surfaces were also tested at 90 degree rotations from that side.

Bluetooth Notes

1. Bluetooth SAR was evaluated with a test mode with hopping disabled. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. See section 7.2 for the time domain plot and calculation for the duty factor of the device.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 15 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 15 01 21	

10 MEASUREMENT VARIABILITY

10.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01, SAR measurement variability was not assessed for each frequency band since all measured SAR values are < 0.8 W/kg for 1g SAR and < 2.0 W/kg for 10g SAR.

10.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g and <3.75 W/kg for 10g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 was not required.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 16 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 16 01 21	

11 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Rohde & Schwarz	FSP-7	Spectrum Analyzer	2/8/2023	Annual	2/8/2024	100990
Agilent	E4438C	ESG Vector Signal Generator	4/25/2023	Annual	4/25/2024	US41460739
Agilent	N5182A	MXG Vector Signal Generator	4/1/2023	Annual	4/1/2024	MY47420837
Agilent	8753ES	S-Parameter Vector Network Analyzer	6/2/2023	Annual	6/2/2024	MY40003841
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	343972
Anritsu	ML2496A	Power Meter	4/4/2023	Annual	4/4/2024	1840005
Anritsu	MA2411B	Pulse Power Sensor	10/21/2022	Annual	10/21/2023	1207364
Anritsu	MA24106A	USB Power Sensor	4/21/2023	Annual	4/21/2024	1244515
Anritsu	MA24106A	USB Power Sensor	3/10/2023	Annual	3/10/2024	2018527
Control Company	4040	Therm/ Clock/ Humidity Monitor	1/17/2023	Annual	1/17/2024	160574418
Mitutoyo	500-196-30	CD-6"ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N9020A	MXA Signal Analyzer	3/15/2023	Annual	3/15/2024	US46470561
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Huber + Suhner	74Z-0-021	Torque Wrench	4/6/2022	Biennial	4/6/2024	83881
SPEAG	DAK-3.5	Dielectric Assessment Kit	10/17/2022	Annual	10/17/2023	1091
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1243
SPEAG	D2450V2	2450 MHz SAR Dipole	11/9/2021	Biennial	11/9/2023	921
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/15/2023	Annual	2/15/2024	1403
SPEAG	EX3DV4	SAR Probe	2/13/2023	Annual	2/13/2024	7427

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. Each equipment item was used solely within its respective calibration period.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 17 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 17 0121	

12 MEASUREMENT UNCERTAINTIES

			r			1			<u> </u>
а	b	С	d	e=	f	g	h =	i =	k
				f(d,k)			c x f/e	c x g/e	
	IEEE	Tol.	Prob.		c	C _i	1gm	10gms	
Uncertainty Component	1528 Sec.	(± %)	Dist.	Div.	1gm	10 gms	u	u _i	v
							(± %)	(± %)	
Measurement System									
Probe Calibration	E.2.1	7	Ν	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	Ν	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	Ν	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	Ν	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.732	1	1	0.1	0.1	8
Modulation Response	E.2.5	4.8	R	1.732	1	1	2.8	2.8	8
Readout Electronics	E.2.6	0.3	Ν	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.732	1	1	1.5	1.5	8
RF Ambient Conditions - Noise	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.732	1	1	1.7	1.7	8
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.732	1	1	0.5	0.5	8
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.732	1	1	3.9	3.9	8
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.732	1	1	2.3	2.3	8
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	Ν	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	Ν	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.732	1	1	0.0	0.0	8
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	8
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	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Unceritainty	E.3.4	0.6	R	1.732	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	1		I	12.2	12.0	191
Expanded Uncertainty			k=2				24.4	24.0	
(95% CONFIDENCE LEVEL)								-	
· · · · · · · · · · · · · · · · · · ·								1	

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

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 18 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Page 18 01 21

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]

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager
Document S/N:	DUT Type:	Page 19 of 21
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 19 01 21

14 **REFERENCES**

- [1] Federal Communications Commission, ET Docket 93-62, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, Aug. 1996.
- [2] ANSI/IEEE C95.1-2005, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, 2006.
- [3] ANSI/IEEE C95.1-1992, American National Standard safety levels with respect to human exposure to radio frequency electromagnetic fields, 3kHz to 300GHz, New York: IEEE, Sept. 1992.
- [4] ANSI/IEEE C95.3-2002, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields RF and Microwave, New York: IEEE, December 2002.
- [5] IEEE Standards Coordinating Committee 39 Standards Coordinating Committee 34 IEEE Std. 1528-2013, IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.
- [6] NCRP, National Council on Radiation Protection and Measurements, Biological Effects and Exposure Criteria for RadioFrequency Electromagnetic Fields, NCRP Report No. 86, 1986. Reprinted Feb. 1995.
- [7] T. Schmid, O. Egger, N. Kuster, Automated E-field scanning system for dosimetric assessments, IEEE Transaction on Microwave Theory and Techniques, vol. 44, Jan. 1996, pp. 105-113.
- [8] K. Pokovic, T. Schmid, N. Kuster, Robust setup for precise calibration of E-field probes in tissue simulating liquids at mobile communications frequencies, ICECOM97, Oct. 1997, pp. 1 -124.
- [9] K. Pokovic, T. Schmid, and N. Kuster, E-field Probe with improved isotropy in brain simulating liquids, Proceedings of the ELMAR, Zadar, Croatia, June 23-25, 1996, pp. 172-175.
- [10] Schmid & Partner Engineering AG, Application Note: Data Storage and Evaluation, June 1998, p2.
- [11] V. Hombach, K. Meier, M. Burkhardt, E. Kuhn, N. Kuster, The Dependence of EM Energy Absorption upon Human Modeling at 900 MHz, IEEE Transaction on Microwave Theory and Techniques, vol. 44 no. 10, Oct. 1996, pp. 1865-1873.
- [12] N. Kuster and Q. Balzano, Energy absorption mechanism by biological bodies in the near field of dipole antennas above 300MHz, IEEE Transaction on Vehicular Technology, vol. 41, no. 1, Feb. 1992, pp. 17-23.
- [13] G. Hartsgrove, A. Kraszewski, A. Surowiec, Simulated Biological Materials for Electromagnetic Radiation Absorption Studies, University of Ottawa, Bioelectromagnetics, Canada: 1987, pp. 29-36.
- [14] Q. Balzano, O. Garay, T. Manning Jr., Electromagnetic Energy Exposure of Simulated Users of Portable Cellular Telephones, IEEE Transactions on Vehicular Technology, vol. 44, no.3, Aug. 1995.
- [15] W. Gander, Computermathematick, Birkhaeuser, Basel, 1992.
- [16] W.H. Press, S.A. Teukolsky, W.T. Vetterling, and B.P. Flannery, Numerical Recipes in C, The Art of Scientific Computing, Second edition, Cambridge University Press, 1992.
- [17] N. Kuster, R. Kastle, T. Schmid, Dosimetric evaluation of mobile communications equipment with known precision, IEEE Transaction on Communications, vol. E80-B, no. 5, May 1997, pp. 645-652.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 20 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 20 01 2 1	

- [18] CENELEC CLC/SC111B, European Prestandard (prENV 50166-2), Human Exposure to Electromagnetic Fields Highfrequency: 10kHz-300GHz, Jan. 1995.
- [19] Prof. Dr. Niels Kuster, ETH, Eidgenössische Technische Hoschschule Zürich, Dosimetric Evaluation of the Cellular Phone.
- [20] IEC/IEEE 62209-1528-1, Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 1: Devices used next to the ear (Frequency range of 300 MHz to 6 GHz), July 2016.
- [21] Innovation, Science, Economic Development Canada RSS-102 Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands) Issue 5, March 2015.
- [22] Health Canada Safety Code 6 Limits of Human Exposure to Radio Frequency Electromagnetic Fields in the Frequency Range from 3 kHz 300 GHz, 2015
- [23] FCC SAR Test Procedures for 2G-3G Devices, Mobile Hotspot and UMPC Devices KDB Publications 941225, D01-D07
- [24] SAR Measurement Guidance for IEEE 802.11 Transmitters, KDB Publication 248227 D01
- [25] FCC SAR Considerations for Handsets with Multiple Transmitters and Antennas, KDB Publications 648474 D03-D04
- [26] FCC SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers, FCC KDB Publication 616217 D04
- [27] FCC SAR Measurement and Reporting Requirements for 100MHz 6 GHz, KDB Publications 865664 D01-D02
- [28] FCC General RF Exposure Guidance and SAR Procedures for Dongles, KDB Publication 447498, D01-D02
- [29] Anexo à Resolução No. 533, de 10 de Septembro de 2009.

FCC ID: BCGA3085	SAR EVALUATION REPORT	Approved by: Technical Manager	
Document S/N:	DUT Type:	Page 21 of 21	
1C2308180043-01.BCG (Rev 3)	Stylus Pen	Fage 21 01 21	