



# FCC SAR TEST REPORT

**FCC ID** : HLZAX200NG  
**Equipment** : WLAN+Bluetooth module Intel AX200NGW  
**Brand Name** : acer  
**Model Name** : AX200NGW  
**Marketing Name** : AX200  
**Applicant** : Acer Incorporated  
8F., No. 88, Sec. 1, Xintai 5th Rd., Xizhi Dist., New Taipei City  
22181, Taiwan (R.O.C)  
**Manufacturer** : Acer Incorporated  
8F., No. 88, Sec. 1, Xintai 5th Rd., Xizhi Dist., New Taipei City  
22181, Taiwan (R.O.C)  
**Standard** : FCC 47 CFR Part 2 (2.1093)  
ANSI/IEEE C95.1-1992  
IEEE 1528-2013

The product was installed into Notebook computer (Brand Name acer, Model Name: N20H2) during test.

The product was received on Jun. 15, 2020 and testing was started from Jun. 26, 2020 and completed on Jun. 26, 2020. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the test procedures and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory, the test report shall not be reproduced except in full.



Approved by: Cona Huang / Deputy Manager

**SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory**  
No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.)



**Table of Contents**

**1. Statement of Compliance ..... 4**

**2. Guidance Applied..... 4**

**3. Equipment Under Test (EUT) Information ..... 5**

    3.1 General Information ..... 5

**4. RF Exposure Limits..... 6**

    4.1 Uncontrolled Environment..... 6

    4.2 Controlled Environment..... 6

**5. Specific Absorption Rate (SAR)..... 7**

    5.1 Introduction ..... 7

    5.2 SAR Definition..... 7

**6. System Description and Setup ..... 8**

    6.1 Test Side Location..... 8

    6.2 E-Field Probe..... 9

    6.3 Data Acquisition Electronics (DAE) ..... 9

    6.4 Phantom..... 10

    6.5 Device Holder..... 11

**7. Measurement Procedures ..... 12**

    7.1 Spatial Peak SAR Evaluation..... 12

    7.2 Power Reference Measurement..... 13

    7.3 Area Scan ..... 13

    7.4 Zoom Scan..... 14

    7.5 Volume Scan Procedures..... 14

    7.6 Power Drift Monitoring..... 14

**8. Test Equipment List..... 15**

**9. System Verification ..... 16**

    9.1 Tissue Simulating Liquids..... 16

    9.2 Tissue Verification ..... 17

    9.3 System Performance Check Results..... 18

**10. WiFi/Bluetooth Output Power (Unit: dBm) ..... 19**

**11. Antenna Location ..... 35**

**12. SAR Test Results ..... 36**

    12.1 Body SAR ..... 37

**13. Simultaneous Transmission Analysis ..... 39**

    13.1 Body Exposure Conditions ..... 39

**14. Uncertainty Assessment ..... 40**

**15. References ..... 40**

**Appendix A. Plots of System Performance Check**

**Appendix B. Plots of High SAR Measurement**

**Appendix C. DASy Calibration Certificate**

**Appendix D. Test Setup Photos**



### History of this test report

Report No.	Version	Description	Issued Date
FA060401	01	Initial issue of report	Jul. 07, 2020



1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Acer Incorporated, WLAN+Bluetooth module Intel AX200NGW, AX200NGW**, are as follows.

Equipment Class	Frequency Band		Highest SAR Summary	
			Body (Separation 0mm)	Highest Simultaneous Transmission 1g SAR (W/kg)
			1g SAR (W/kg)	
DTS	WLAN	2.4GHz WLAN	0.43	0.70
NII		5GHz WLAN	0.17	0.35
DSS	2.4GHz Band	Bluetooth	0.03	0.35
Date of Testing:			2020/6/26	

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190) and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.(FCC) This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

Reviewed by: Jason Wang  
Report Producer: Daisy Peng

2. Guidance Applied

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 616217 D04 SAR for laptop and tablets v01r02



### 3. Equipment Under Test (EUT) Information

#### 3.1 General Information

Product Feature & Specification	
Equipment Name	WLAN+Bluetooth module Intel AX200NGW
Brand Name	acer
Model Name	AX200NGW
Marketing Name	AX200
FCC ID	HLZAX200NG
S / N	N8HYPWW00101703CAC2N00
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2400 MHz ~ 2483.5 MHz WLAN 5.2GHz Band: 5150 MHz ~ 5250 MHz WLAN 5.3GHz Band: 5250 MHz ~ 5350 MHz WLAN 5.6GHz Band: 5470 MHz ~ 5725 MHz WLAN 5.8GHz Band: 5725 MHz ~ 5825 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz
Mode	WLAN: 802.11a/b/g/n/ac/ax HT20/HT40/VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160 Bluetooth BR/EDR/LE
SW Version	Windows 10 pro 64-bit (10.0 · Build 17763)
<b>Remark:</b>	
1. There are three Samples, RF exposure evaluation is selected SKU1 as the main tested, SKU 2/3 will spot check worst case found in SKU1.	

SKU List			
	SKU1	SKU2	SKU3
CPU	Intel Celeron ICDN402	Intel Celeron Quad-Core ICQN4120	Intel Pentium Quad-Core PQCN5030
LPDDR4	MICRON LPDDR4 3200 1GB	SAMSUNG LPDDR4 3733 2GB	HYNIX LPDDR4 3733 2GB
EMMC	SANDISK NAND 64GB SDINBDA4-64-1220V	SANDISK NAND 128GB SDINBDA4-128-1220V	
SSD	SANDISK SSD NAND 128GB SDAPNUW-128G-1014		HYNIX SSD NAND 256GB M.2 2280 BC511 HFM256GDJJNI-82A0A
Panel	LED LCD Panel CMI 14' FHD None Glare N140HCA-EAC rev C2 LF	LED LCD Panel CMI 14' FHD None Glare N140HCE-EN2 LF	LED LCD Panel AUO 14' FHD None Glare B140HAN04.0 LF
Battery	Battery MURATA Typ.48Wh 4200mAh 3S1P AP18C4K	Battery LGC Typ.50Wh 4470mAh 3S1P AP18C8K	SIMPLO Typ.56Wh 3634mAh 4S1P AP18C7M
WLAN	Wireless LAN Intel 802.11ax Bluetooth FM AX200.NG.WG.NV	Wireless LAN Intel 802.11ax Bluetooth FM AX200.NG.WG.NV	Wireless LAN Intel 802.11ax Bluetooth FM AX200.NG.WG.NV

Host Information	
Equipment Name	Notebook computer
Brand Name	acer
Model Name	N20H2
Marketing Name	Swift 1, SF114-33, SF114-34
EUT Stage	Identical Prototype



## 4. RF Exposure Limits

### 4.1 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.

### 4.2 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. The 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.

**Limits for Occupational/Controlled Exposure (W/kg)**

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

**Limits for General Population/Uncontrolled Exposure (W/kg)**

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

1. Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

## **5. Specific Absorption Rate (SAR)**

### **5.1 Introduction**

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

### **5.2 SAR Definition**

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density ( $\rho$ ). The equation description is as below:

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

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

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  is the mass density of the tissue and E is the RMS electrical field strength.

## 6. System Description and Setup

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 WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

### 6.1 Test Side Location

Sporton Lab and below test site location are accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190 and 0007) and the FCC designation No. TW1190 and TW0007 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.


Test Side	SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory			
Test Site Location	TW1190 No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City 333, CHINESE TAIPEI		TW0007 No. 58, Aly. 75, Ln. 564, Wehnuia 3rd, Rd., Guishan Dist., Taoyuan City, CHINESE TAIPEI	
	SAR01-HY	SAR03-HY	SAR08-HY	SAR09-HY
Test Site No.	SAR04-HY	SAR05-HY	SAR11-HY	SAR12-HY
	SAR06-HY	SAR10-HY		




**6.2 E-Field Probe**

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG).The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

**<ES3DV3 Probe>**

<b>Construction</b>	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
<b>Frequency</b>	10 MHz – 4 GHz; Linearity: $\pm 0.2$ dB (30 MHz – 4 GHz)	
<b>Directivity</b>	$\pm 0.2$ dB in TSL (rotation around probe axis) $\pm 0.3$ dB in TSL (rotation normal to probe axis)	
<b>Dynamic Range</b>	5 $\mu$ W/g – >100 mW/g; Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	Overall length: 337 mm (tip: 20 mm) Tip diameter: 3.9 mm (body: 12 mm) Distance from probe tip to dipole centers: 3.0 mm	

**<EX3DV4 Probe>**

<b>Construction</b>	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
<b>Frequency</b>	10 MHz – >6 GHz Linearity: $\pm 0.2$ dB (30 MHz – 6 GHz)	
<b>Directivity</b>	$\pm 0.3$ dB in TSL (rotation around probe axis) $\pm 0.5$ dB in TSL (rotation normal to probe axis)	
<b>Dynamic Range</b>	10 $\mu$ W/g – >100 mW/g Linearity: $\pm 0.2$ dB (noise: typically <1 $\mu$ W/g)	
<b>Dimensions</b>	Overall length: 337 mm (tip: 20 mm) Tip diameter: 2.5 mm (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

**6.3 Data Acquisition Electronics (DAE)**

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.


The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



**Fig 5.1 Photo of DAE**

**6.4 Phantom**

**<SAM Twin Phantom>**

<b>Shell Thickness</b>	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm	
<b>Filling Volume</b>	Approx. 25 liters	
<b>Dimensions</b>	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	
<b>Measurement Areas</b>	Left Hand, Right Hand, Flat Phantom	

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

**<ELI Phantom>**

<b>Shell Thickness</b>	2 ± 0.2 mm (sagging: <1%)	
<b>Filling Volume</b>	Approx. 30 liters	
<b>Dimensions</b>	Major ellipse axis: 600 mm Minor axis: 400 mm	

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

## **6.5 Device Holder**

### **<Mounting Device for Hand-Held Transmitter>**

In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat). And upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.



Mounting Device for Hand-Held Transmitters



Mounting Device Adaptor for Wide-Phones

### **<Mounting Device for Laptops and other Body-Worn Transmitters>**

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Mounting Device for Laptops



## **7. Measurement Procedures**

The measurement procedures are as follows:

### <Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

### <SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

### **7.1 Spatial Peak SAR Evaluation**

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

**7.2 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. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

**7.3 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 found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r04 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.	

**7.4 Zoom Scan**

Zoom scans are used assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube shoes 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 gram and 10 gram and displays these values next to the job's label.

Zoom scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

		≤ 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.				

**7.5 Volume Scan Procedures**

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

**7.6 Power Drift Monitoring**

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASy measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.



**8. Test Equipment List**

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	929	Nov. 21, 2019	Nov. 20, 2020
SPEAG	5GHz System Validation Kit	D5GHzV2	1128	Dec. 16, 2019	Dec. 15, 2020
SPEAG	Data Acquisition Electronics	DAE4	1311	Aug. 27, 2019	Aug. 26, 2020
SPEAG	Dosimetric E-Field Probe	EX3DV4	3642	Apr. 29, 2020	Apr. 28, 2021
RCPTWN	Thermometer	HTC-1	TM560-2	Nov. 12, 2019	Nov. 11, 2020
R&S	BT Base Station	CBT	100815	Feb. 15, 2020	Feb. 14, 2021
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Nov. 20, 2019	Nov. 19, 2020
Agilent	ENA Network Analyzer	E5071C	MY46104758	Sep. 06, 2019	Sep. 05, 2020
SPEAG	Dielectric Probe Kit	DAK-3.5	1126	Sep. 18, 2019	Sep. 17, 2020
LINE SEIKI	Digital Thermometer	DTM3000-spezial	3169	Sep. 10, 2019	Sep. 09, 2020
Anritsu	Power Meter	ML2495A	1036004	Aug. 08, 2019	Aug. 07, 2020
Anritsu	Power Sensor	MA2411B	1027253	Aug. 08, 2019	Aug. 07, 2020
Anritsu	Power Meter	ML2495A	1218006	Oct. 14, 2019	Oct. 13, 2020
Anritsu	Power Sensor	MA2411B	1207363	Oct. 14, 2019	Oct. 13, 2020
Agilent	Spectrum Analyzer	E4408B	MY44211028	Aug. 27, 2019	Aug. 26, 2020
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jun. 27, 2019	Jun. 26, 2020
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 16, 2019	Oct. 15, 2020
Mini-Circuits	Power Amplifier	ZVE-8G+	6382	Aug. 12, 2019	Aug. 11, 2020
ATM	Dual Directional Coupler	C122H-10	P610410z-02	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005-3	N/A	Note 1	

**General Note:**

1. Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.



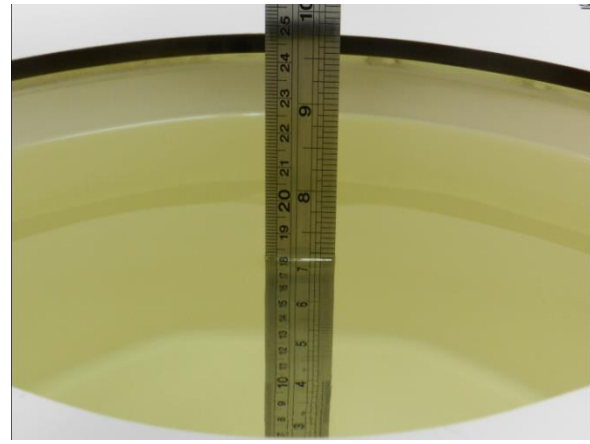
## **9. System Verification**

### **9.1 Tissue Simulating Liquids**

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.1. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.2.



**Fig 10.1** Photo of Liquid Height for Head SAR



**Fig 10.2** Photo of Liquid Height for Body SAR





**9.2 Tissue Verification**

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
2600	54.8	0	0	0.1	0	45.1	1.96	39.0

**Simulating Liquid for 5GHz, Manufactured by SPEAG**

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

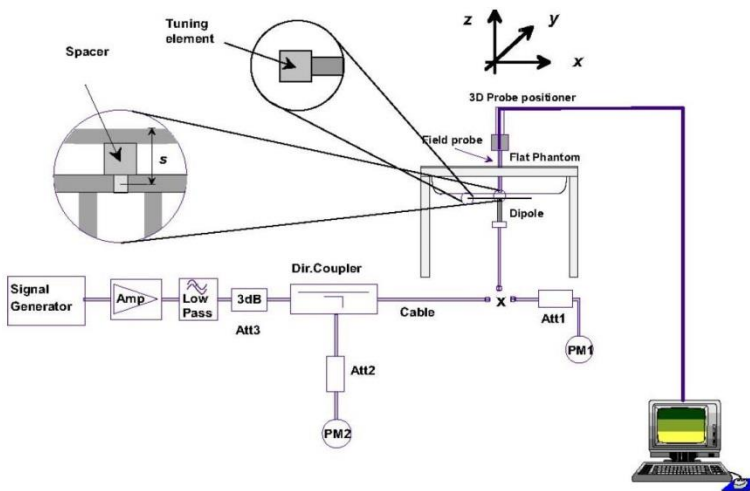
**<Tissue Dielectric Parameter Check Results>**

Frequency (MHz)	Liquid Temp. (°C)	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	Conductivity Target ( $\sigma$ )	Permittivity Target ( $\epsilon_r$ )	Delta ( $\sigma$ ) (%)	Delta ( $\epsilon_r$ ) (%)	Limit (%)	Date
2450	22.2	1.837	38.658	1.80	39.20	2.06	-1.38	±5	2020/6/26
5250	22.3	4.562	36.169	4.71	35.95	-3.14	0.61	±5	2020/6/26
5600	22.3	4.917	35.687	5.07	35.50	-3.02	0.53	±5	2020/6/26
5750	22.3	5.066	35.411	5.22	35.35	-2.95	0.17	±5	2020/6/26

**9.3 System Performance Check Results**

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz) <sup>2</sup>	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2020/6/26	2450	250	D2450V2-929	EX3DV4 - SN3642	DAE4 Sn1311	13.00	53.10	52	-2.07
2020/6/26	5250	100	D5GHzV2-1128-5250	EX3DV4 - SN3642	DAE4 Sn1311	8.62	80.00	86.2	7.75
2020/6/26	5600	100	D5GHzV2-1128-5600	EX3DV4 - SN3642	DAE4 Sn1311	8.72	82.40	87.2	5.83
2020/6/26	5750	100	D5GHzV2-1128-5750	EX3DV4 - SN3642	DAE4 Sn1311	7.56	79.10	75.6	-4.42



**Fig 8.3.1 System Performance Check Setup**



**Fig 8.3.2 Setup Photo**



## 10. WiFi/Bluetooth Output Power (Unit: dBm)

### General Note:

1. For each antenna, transmit power in SISO operation is larger than (or equal to) the power in MIMO operation, RF exposure compliance of MIMO mode can be deduced from the compliance simultaneous transmission of antennas operating in SISO mode.
2. Per KDB 248227 D01v02r02, the simultaneous SAR provisions in KDB publication 447498 should be applied to determine simultaneous transmission SAR test exclusion for WiFi MIMO. If the sum of 1g single transmission chain SAR measurements is  $< 1.6\text{W/kg}$  and SAR peak to location ratio  $\leq 0.04$ , no additional SAR measurements for MIMO.
3. The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures. For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) 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/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band. Additional output power measurements were not deemed necessary
4. Per KDB 248227 D01v02r02, SAR test reduction is determined according to 802.11 transmission mode configurations and certain exposure conditions with multiple test positions. In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. For OFDM, in both 2.4 and 5 GHz bands, an initial test configuration must be determined for each standalone and aggregated frequency band, according to the transmission mode configuration with the highest maximum output power specified for production units to perform SAR measurements. If the same highest maximum output power applies to different combinations of channel bandwidths, modulations and data rates, additional procedures are applied to determine which test configurations require SAR measurement. When applicable, an initial test position may be applied to reduce the number of SAR measurements required for next to the ear, UMPC mini-tablet or hotspot mode configurations with multiple test positions.
5. For 2.4 GHz 802.11b DSSS, either the initial test position procedure for multiple exposure test positions or the DSSS procedure for fixed exposure position is applied; these are mutually exclusive. For 2.4 GHz and 5 GHz OFDM configurations, the initial test configuration is applied to measure SAR using either the initial test position procedure for multiple exposure test position configurations or the initial test configuration procedures for fixed exposure test conditions. Based on the reported SAR of the measured configurations and maximum output power of the transmission mode configurations that are not included in the initial test configuration, the subsequent test configuration and initial test position procedures are applied to determine if SAR measurements are required for the remaining OFDM transmission configurations. In general, the number of test channels that require SAR measurement is minimized based on maximum output power measured for the test sample(s).
6. For OFDM transmission configurations in the 2.4 GHz and 5 GHz bands, 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/g/n/ac mode is used for SAR measurement, on the highest measured output power channel for each frequency band.
7. DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures. 18 The initial test position procedure is described in the following:
  - a. When the reported SAR of the initial test position is  $\leq 0.4\text{ W/kg}$ , further SAR measurement is not required for the other test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band.
  - b. When the reported SAR of the test position is  $> 0.4\text{ W/kg}$ , SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is  $\leq 0.8\text{ W/kg}$  or all required test position are tested.
  - c. For all positions/configurations, when the reported SAR is  $> 0.8\text{ W/kg}$ , SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2\text{ W/kg}$  or all required channels are tested.
8. Per 201904 TCBC workshops, General principles of FCC KDB Publication 248227 D01 can be applied to determine the SAR Initial Test Configurations and test reduction for 802.11ax SAR testing. For the table below the 802.11ax maximum power is SU (non-OFDMA), and the SU maximum power also higher than RU (OFDMA)
9. In applying the test guidance, the IEEE 802.11 mode with the maximum output power (out of all modes) should be considered for testing
10. For modes with the same maximum output power, the guidance from section 5.3.2 a) of FCC KDB Publication 248227 D01 should be applied, with 802.11ax being considered as the highest 802.11 mode for the appropriate frequency bands
11. When SAR testing for 802.11ax is required
  - a. If the maximum output power is highest for OFDMA scenarios, choose the tone size with the maximum number of tones and the highest maximum output power
  - b. Otherwise, consider the fully allocated channel for SAR testing
  - c. When SAR testing is required on RU sizes less than the fully allocated channel, use the RU number closest to the middle of the channel, choosing the higher RU number when two RUs are equidistant to the middle of the channel



<2.4GHz WLAN ANT 1>

Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %	
2.4GHz WLAN	802.11b 1Mbps	1	2412	19.30	19.50	100.00
		6	2437	20.90	21.00	
		11	2462	19.30	19.50	
	802.11g 6Mbps	1	2412	Not required	17.00	Not required
		6	2437		21.00	
		11	2462		15.00	
	802.11n-HT20 MCS0	1	2412		17.50	
		6	2437		20.50	
		11	2462		17.00	
802.11n-HT40 MCS0	3	2422	17.50			
	6	2437	17.00			
	9	2452	15.50			
802.11ax-HE20 MCS0	1	2412	17.00			
	6	2437	19.50			
	11	2462	16.50			
802.11ax-HE40 MCS0	3	2422	17.50			
	6	2437	17.00			
	9	2452	15.00			

<2.4GHz WLAN ANT 2>

Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %	
2.4GHz WLAN	802.11b 1Mbps	1	2412	19.70	20.00	100.00
		6	2437	20.60	21.00	
		11	2462	18.90	19.00	
	802.11g 6Mbps	1	2412	Not required	17.00	Not required
		6	2437		20.50	
		11	2462		15.50	
	802.11n-HT20 MCS0	1	2412		17.00	
		6	2437		20.50	
		11	2462		17.00	
802.11n-HT40 MCS0	3	2422	16.50			
	6	2437	17.00			
	9	2452	16.00			
802.11ax-HE20 MCS0	1	2412	17.00			
	6	2437	19.50			
	11	2462	16.50			
802.11ax-HE40 MCS0	3	2422	17.00			
	6	2437	16.50			
	9	2452	15.50			



<2.4GHz WLAN ANT 1+2>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
2.4GHz WLAN	802.11n-HT20 MCS0	1	2412	Not required	19.00	Not required
		6	2437		22.50	
		11	2462		17.50	
	802.11n-HT40 MCS0	3	2422		17.50	
		6	2437		18.00	
		9	2452		18.00	
	802.11ax-HE20 MCS0	1	2412		19.00	
		6	2437		19.50	
		11	2462		17.00	
	802.11ax-HE40 MCS0	3	2422		18.00	
		6	2437		18.00	
		9	2452		17.50	



<5GHz WLAN ANT1>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.2GHz WLAN	802.11a 6Mbps	36	5180	Not required	19.00	Not required
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11n-HT20 MCS0	36	5180		19.00	
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11n-HT40 MCS0	38	5190		18.50	
		46	5230		20.50	
	802.11ac-VHT20 MCS0	36	5180		19.00	
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11ac-VHT40 MCS0	38	5190		18.50	
		46	5230		20.50	
	802.11ac-VHT80 MCS0	42	5210		19.00	
	802.11ax-HE20 MCS0	36	5180		19.00	
		40	5200		21.00	
		44	5220		21.00	
48		5240	21.00			
802.11ax-HE40 MCS0	38	5190	18.50			
	46	5230	20.50			
802.11ax-HE80 MCS0	42	5210	19.00			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.3GHz WLAN	802.11a 6Mbps	52	5260	20.90	21.00	97.90
		56	5280	20.80	21.00	
		60	5300	20.90	21.00	
		64	5320	18.40	18.50	
	802.11n-HT20 MCS0	52	5260	Not required	21.00	Not required
		56	5280		21.00	
		60	5300		21.00	
		64	5320		18.00	
	802.11n-HT40 MCS0	54	5270		20.50	
		62	5310		17.50	
	802.11ac-VHT20 MCS0	52	5260		21.00	
		56	5280		21.00	
		60	5300		21.00	
		64	5320		18.00	
	802.11ac-VHT40 MCS0	54	5270		20.50	
		62	5310		17.50	
	802.11ac-VHT80 MCS0	58	5290		18.50	
	802.11ac-VHT160 MCS0	50	5250		14.50	
	802.11ax-HE20 MCS0	52	5260		21.00	
		56	5280		21.00	
60		5300	21.00			
64		5320	17.50			
802.11ax-HE40 MCS0	54	5270	20.50			
	62	5310	17.00			
802.11ax-HE80 MCS0	58	5290	18.00			
802.11ax-HE160 MCS0	50	5250	15.00			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.5GHz WLAN	802.11a 6Mbps	100	5500	Not required	19.00	Not required
		116	5580		21.00	
		124	5620		21.00	
		132	5660		21.00	
		144	5720		21.00	
	802.11n-HT20 MCS0	100	5500		19.00	
		116	5580		21.00	
		124	5620		21.00	
		132	5660		21.00	
		144	5720		21.00	
	802.11n-HT40 MCS0	102	5510		18.50	
		110	5550		21.00	
		126	5630		21.00	
		134	5670		19.50	
		142	5710		21.00	
	802.11ac-VHT20 MCS0	100	5500		19.00	
		116	5580		21.00	
		124	5620		21.00	
		132	5660		21.00	
		144	5720		21.00	
	802.11ac-VHT40 MCS0	102	5510		18.50	
		110	5550		21.00	
		126	5630		21.00	
		134	5670		19.50	
		142	5710		21.00	
	802.11ac-VHT80 MCS0	106	5530		18.70	
		122	5610		19.90	
		138	5690		20.80	
	802.11ac-VHT160 MCS0	114	5570		15.50	
	802.11ax-HE20 MCS0	100	5500		19.00	
		116	5580		21.00	
		124	5620		21.00	
132		5660	21.00			
144		5720	21.00			
802.11ax-HE40 MCS0	102	5510	18.50			
	110	5550	21.00			
	126	5630	21.00			
	134	5670	19.00			
	142	5710	21.00			
802.11ax-HE80 MCS0	106	5530	19.00			
	122	5610	19.50			
	138	5690	21.00			
802.11ax-HE160 MCS0	114	5570	15.50			





	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11a 6Mbps	149	5745	Not required	21.00	Not required
		157	5785		21.00	
		165	5825		21.00	
	802.11n-HT20 MCS0	149	5745		21.00	
		157	5785		21.00	
		165	5825		21.00	
	802.11n-HT40 MCS0	151	5755	20.90	21.00	98.15
		159	5795	20.60	21.00	
	802.11ac-VHT20 MCS0	149	5745	Not required	21.00	Not required
		157	5785		21.00	
		165	5825		21.00	
	802.11ac-VHT40 MCS0	151	5755		21.00	
		159	5795		21.00	
	802.11ac-VHT80 MCS0	155	5775		19.00	
	802.11ax-HE20 MCS0	149	5745		21.00	
		157	5785		21.00	
		165	5825		21.00	
	802.11ax-HE40 MCS0	151	5755		21.00	
159		5795	21.00			
802.11ax-HE80 MCS0	155	5775	19.00			



<5GHz WLAN ANT2>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.2GHz WLAN	802.11a 6Mbps	36	5180	Not required	19.00	Not required
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11n-HT20 MCS0	36	5180		19.00	
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11n-HT40 MCS0	38	5190		18.50	
		46	5230		20.50	
	802.11ac-VHT20 MCS0	36	5180		19.00	
		40	5200		21.00	
		44	5220		21.00	
		48	5240		21.00	
	802.11ac-VHT40 MCS0	38	5190		18.50	
		46	5230		20.50	
	802.11ac-VHT80 MCS0	42	5210		19.00	
	802.11ax-HE20 MCS0	36	5180		19.00	
		40	5200		21.00	
44		5220	21.00			
48		5240	21.00			
802.11ax-HE40 MCS0	38	5190	18.50			
	46	5230	20.50			
802.11ax-HE80 MCS0	42	5210	19.00			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.3GHz WLAN	802.11a 6Mbps	52	5260	20.80	21.00	97.44
		56	5280	20.80	21.00	
		60	5300	20.90	21.00	
		64	5320	18.40	18.50	
	802.11n-HT20 MCS0	52	5260	Not required	21.00	Not required
		56	5280		21.00	
		60	5300		21.00	
		64	5320		18.00	
	802.11n-HT40 MCS0	54	5270		20.50	
		62	5310		17.50	
	802.11ac-VHT20 MCS0	52	5260		21.00	
		56	5280		21.00	
		60	5300		21.00	
		64	5320		18.00	
	802.11ac-VHT40 MCS0	54	5270		20.50	
		62	5310		17.50	
	802.11ac-VHT80 MCS0	58	5290		18.50	
	802.11ac-VHT160 MCS0	50	5250		14.50	
	802.11ax-HE20 MCS0	52	5260		21.00	
		56	5280		21.00	
60		5300	21.00			
64		5320	18.00			
802.11ax-HE40 MCS0	54	5270	20.50			
	62	5310	17.50			
802.11ax-HE80 MCS0	58	5290	18.50			
802.11ax-HE160 MCS0	50	5250	14.50			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %		
5.5GHz WLAN	802.11a 6Mbps	100	5500	Not required	19.00	Not required		
		116	5580		21.00			
		124	5620		21.00			
		132	5660		21.00			
		144	5720		21.00			
	802.11n-HT20 MCS0	100	5500		19.00			
		116	5580		21.00			
		124	5620		21.00			
		132	5660		21.00			
		144	5720		21.00			
	802.11n-HT40 MCS0	102	5510		18.50			
		110	5550		21.00			
		126	5630		21.00			
		134	5670		19.00			
		142	5710		21.00			
	802.11ac-VHT20 MCS0	100	5500		19.00			
		116	5580		21.00			
		124	5620		21.00			
		132	5660		21.00			
		144	5720		21.00			
	802.11ac-VHT40 MCS0	102	5510		18.50			
		110	5550		21.00			
		126	5630		21.00			
		134	5670		19.00			
		142	5710		21.00			
	802.11ac-VHT80 MCS0	106	5530		18.30		18.50	98.75
		122	5610		19.40		19.50	
		138	5690		20.90		21.00	
	802.11ac-VHT160 MCS0	114	5570		Not required		15.00	Not required
	802.11ax-HE20 MCS0	100	5500				19.00	
		116	5580				21.00	
		124	5620				21.00	
132		5660	21.00					
144		5720	21.00					
802.11ax-HE40 MCS0	102	5510	18.50					
	110	5550	21.00					
	126	5630	21.00					
	134	5670	18.50					
	142	5710	20.50					
802.11ax-HE80 MCS0	106	5530	18.50					
	122	5610	19.00					
	138	5690	21.00					
802.11ax-HE160 MCS0	114	5570	15.00					



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11a 6Mbps	149	5745	Not required	21.00	Not required
		157	5785		21.00	
		165	5825		21.00	
	802.11n-HT20 MCS0	149	5745		21.00	
		157	5785		21.00	
		165	5825		21.00	
	802.11n-HT40 MCS0	151	5755	20.70	21.00	98.51
		159	5795	20.80	21.00	
	802.11ac-VHT20 MCS0	149	5745	Not required	21.00	Not required
		157	5785		21.00	
		165	5825		21.00	
	802.11ac-VHT40 MCS0	151	5755		21.00	
		159	5795		21.00	
	802.11ac-VHT80 MCS0	155	5775		19.00	
	802.11ax-HE20 MCS0	149	5745		21.00	
		157	5785		21.00	
165		5825	21.00			
802.11ax-HE40 MCS0	151	5755	20.50			
	159	5795	21.00			
802.11ax-HE80 MCS0	155	5775	18.50			



<5GHz WLAN ANT1+2>

	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.2GHz WLAN	802.11n-HT20 MCS0	36	5180	Not required	21.00	Not required
		40	5200		22.50	
		44	5220		22.50	
		48	5240		22.50	
	802.11n-HT40 MCS0	38	5190		20.50	
		46	5230		22.00	
	802.11ac-VHT20 MCS0	36	5180		21.00	
		40	5200		22.50	
		44	5220		22.50	
	802.11ac-VHT40 MCS0	48	5240		22.50	
		38	5190		20.50	
	802.11ac-VHT80 MCS0	46	5230		22.00	
		42	5210		20.00	
	802.11ax-HE20 MCS0	36	5180		21.00	
		40	5200		22.50	
		44	5220		23.00	
48		5240	23.00			
802.11ax-HE40 MCS0	38	5190	20.50			
	46	5230	22.00			
802.11ax-HE80 MCS0	42	5210	20.00			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.3GHz WLAN	802.11n-HT20 MCS0	52	5260	Not required	22.50	Not required
		56	5280		22.50	
		60	5300		22.50	
		64	5320		20.00	
	802.11n-HT40 MCS0	54	5270		22.00	
		62	5310		17.50	
	802.11ac-VHT20 MCS0	52	5260		22.50	
		56	5280		22.50	
		60	5300		22.50	
		64	5320		20.00	
	802.11ac-VHT40 MCS0	54	5270		22.00	
		62	5310		17.50	
	802.11ac-VHT80 MCS0	58	5290		19.00	
	802.11ac-VHT160 MCS0	50	5250		16.5	
	802.11ax-HE20 MCS0	52	5260		22.50	
		56	5280		22.50	
		60	5300		22.50	
		64	5320		20.00	
802.11ax-HE40 MCS0	54	5270	22.00			
	62	5310	18.00			
802.11ax-HE80 MCS0	58	5290	19.00			
802.11ax-HE160 MCS0	50	5250	16.5			



	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.5GHz WLAN	802.11n-HT20 MCS0	100	5500	Not required	21.00	Not required
		116	5580		21.00	
		124	5620		21.00	
		132	5660		21.00	
		144	5720		23.00	
	802.11n-HT40 MCS0	102	5510		21.00	
		110	5550		22.00	
		126	5630		22.00	
		134	5670		22.00	
	802.11ac-VHT20 MCS0	142	5710		23.00	
		100	5500		21.00	
		116	5580		21.00	
		124	5620		21.00	
	802.11ac-VHT40 MCS0	132	5660		21.00	
		144	5720		23.00	
		102	5510		21.00	
		110	5550		22.00	
	802.11ac-VHT80 MCS0	126	5630		22.00	
		134	5670		22.00	
		142	5710		23.00	
		106	5530		21.00	
	802.11ac-VHT160 MCS0	122	5610		22.00	
		138	5690		23.00	
	802.11ax-HE20 MCS0	114	5570		17.00	
		100	5500		21.00	
		116	5580		21.00	
		124	5620		21.00	
		132	5660		21.00	
802.11ax-HE40 MCS0	144	5720	23.00			
	102	5510	21.00			
	110	5550	21.50			
	126	5630	21.50			
802.11ax-HE80 MCS0	134	5670	21.50			
	142	5710	23.00			
	106	5530	20.50			
802.11ax-HE160 MCS0	122	5610	22.00			
	138	5690	23.00			
		114	5570	17.00		





	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11n-HT20 MCS0	149	5745	Not required	23.00	Not required
		157	5785		23.00	
		165	5825		23.00	
	802.11n-HT40 MCS0	151	5755		23.00	
		159	5795		23.00	
	802.11ac-VHT20 MCS0	149	5745		23.00	
		157	5785		23.00	
		165	5825		23.00	
	802.11ac-VHT40 MCS0	151	5755		23.00	
		159	5795		23.00	
	802.11ac-VHT80 MCS0	155	5775		20.50	
	802.11ax-HE20 MCS0	149	5745		23.00	
		157	5785		23.00	
		165	5825		23.00	
802.11ax-HE40 MCS0	151	5755	22.50			
	159	5795	23.00			
802.11ax-HE80 MCS0	155	5775	20.50			



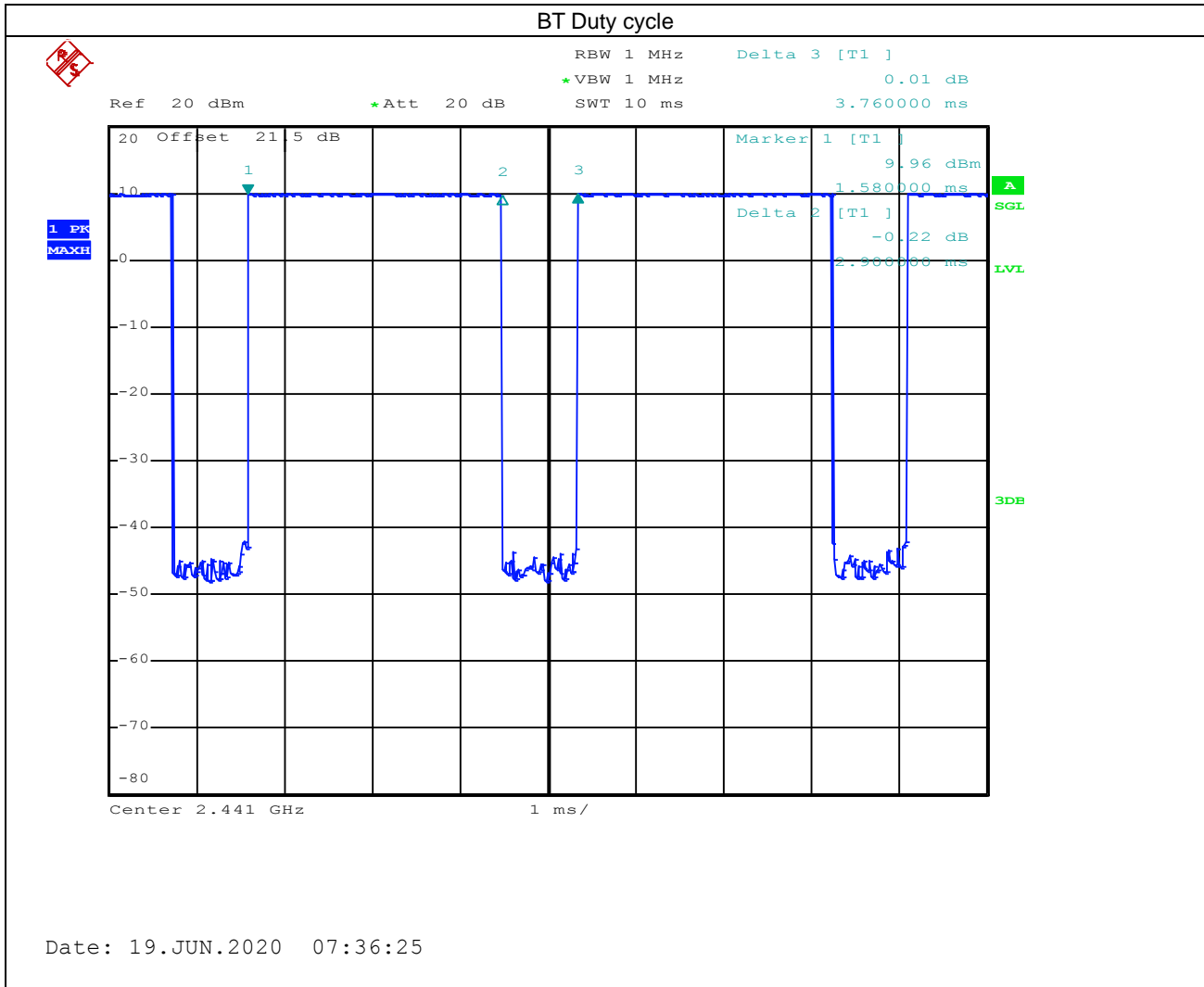
<2.4GHz Bluetooth>

Mode	Channel	Frequency (MHz)	Average power (dBm)		
			1Mbps	2Mbps	3Mbps
BR / EDR	CH 00	2402	10.01	8.59	8.67
	CH 39	2441	10.13	8.66	8.75
	CH 78	2480	10.33	8.69	8.71
Tune-up Limit			11.00	10.50	10.50

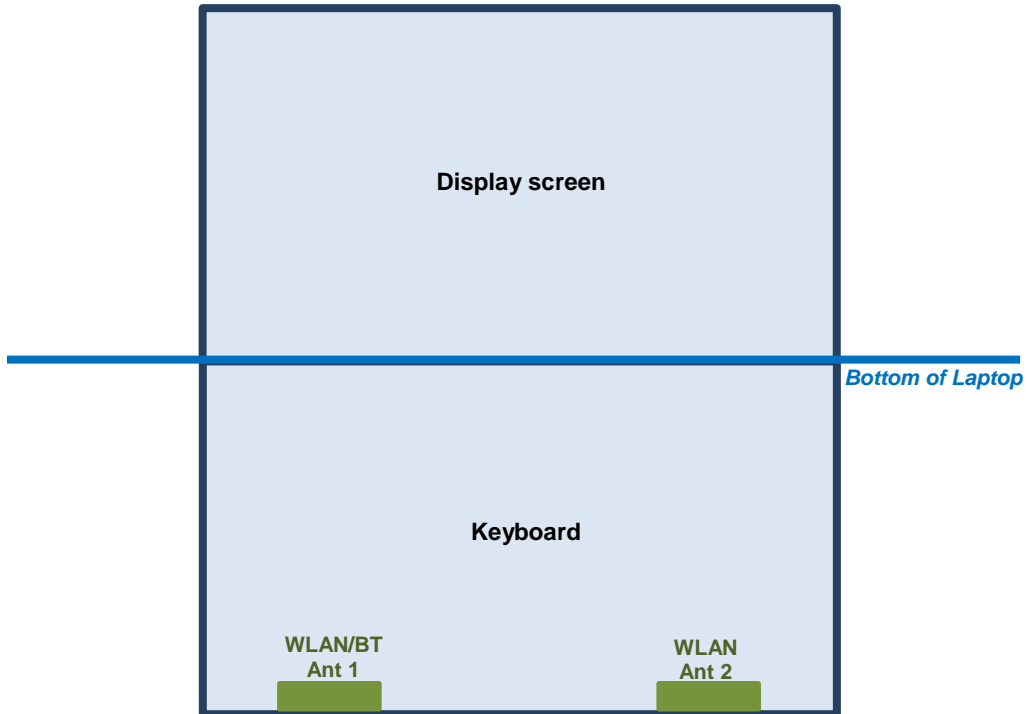
Mode	Channel	Frequency (MHz)	Average power (dBm)
			GFSK
LE	CH 00	2402	5.80
	CH 19	2440	5.60
	CH 39	2480	5.50
Tune-up Limit			6.00

General Note:

- For 2.4GHz Bluetooth SAR testing was selected 1Mbps due to its highest average power and duty cycle is 77.13% considered in SAR testing, and the duty cycle would be scaled to theoretical 83.3% in reported SAR calculation.



**11. Antenna Location**



The separation distance for antenna to edge :

Antenna	To Bottom of Laptop (mm)
WLAN/BT Antenna 1	<5
WLAN Antenna	<5



## 12. SAR Test Results

### General Note:

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
  - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
  - b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
  - c. For WLAN/Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)\* Duty Cycle scaling factor \* Tune-up scaling factor
2. Per KDB 447498 D01v06, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
  - $\leq 0.8$  W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
  - $\leq 0.6$  W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
  - $\leq 0.4$  W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is  $\geq 0.8$ W/kg.

### WLAN Note:

1. Per KDB 248227 D01v02r02, for 2.4GHz 802.11g/n SAR testing is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.
2. Per KDB 248227 D01v02r02, U-NII-1 SAR testing is not required when the U-NII-2A band highest reported SAR for a test configuration is  $\leq 1.2$  W/kg, SAR is not required for U-NII-1 band.
3. When the reported SAR of the test position is  $> 0.4$  W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is  $\leq 0.8$  W/kg or all required test position are tested.
4. For all positions / configurations, when the reported SAR is  $> 0.8$  W/kg, SAR is measured for these test positions / configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required channels are tested.
5. For WLAN SAR testing was performed on single antenna RF power in SISO mode is larger or equal to the single antenna RF power in MIMO mode, and for RF exposure assessment of MIMO mode simultaneous transmission exclusion analysis was performed with SAR test results of each antenna in SISO mode.
6. Per KDB 248227 D01v02r02, the simultaneous SAR provisions in KDB publication 447498 should be applied to determine simultaneous transmission SAR test exclusion for WiFi MIMO. If the sum of 1g single transmission chain SAR measurements is  $< 1.6$ W/kg and SAR peak to location ratio  $\leq 0.04$ , no additional SAR measurements for MIMO.
7. During SAR testing the WLAN transmission was verified using a spectrum analyzer.



12.1 Body SAR

<WLAN SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Ch.	Freq. (MHz)	configure	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
01	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 1	6	2437	SKU1	20.90	21.00	1.023	100	1.000	-0.03	0.422	0.432
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 1	6	2437	SKU2	20.90	21.00	1.023	100	1.000	0.05	0.331	0.339
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 1	6	2437	SKU3	20.90	21.00	1.023	100	1.000	0.09	0.359	0.367
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 1	1	2412	SKU1	19.30	19.50	1.047	100	1.000	-0.02	0.224	0.235
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 1	11	2462	SKU1	19.30	19.50	1.047	100	1.000	0.05	0.226	0.237
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 2	6	2437	SKU1	20.60	21.00	1.096	100	1.000	-0.13	0.241	0.264
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 2	6	2437	SKU2	20.60	21.00	1.096	100	1.000	-0.13	0.218	0.239
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 2	6	2437	SKU3	20.60	21.00	1.096	100	1.000	-0.13	0.222	0.243
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 2	1	2412	SKU1	19.70	20.00	1.072	100	1.000	0.05	0.176	0.189
	WLAN2.4GHz	802.11b 1Mbps	Bottom of Laptop	0mm	Ant 2	11	2462	SKU1	18.90	19.00	1.023	100	1.000	0.17	0.144	0.147
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	52	5260	SKU1	20.90	21.00	1.023	97.9	1.021	-0.12	0.110	0.115
02	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	56	5280	SKU1	20.80	21.00	1.047	97.9	1.021	-0.07	0.145	0.155
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	56	5280	SKU2	20.80	21.00	1.047	97.9	1.021	0.02	0.110	0.118
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	56	5280	SKU3	20.80	21.00	1.047	97.9	1.021	-0.02	0.135	0.144
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	60	5300	SKU1	20.90	21.00	1.023	97.9	1.021	0.05	0.135	0.141
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 1	64	5320	SKU1	18.40	18.50	1.023	97.9	1.021	-0.07	0.075	0.078
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	60	5300	SKU1	20.90	21.00	1.023	97.44	1.026	0.08	0.111	0.117
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	60	5300	SKU2	20.90	21.00	1.023	97.44	1.026	0.02	0.097	0.102
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	60	5300	SKU3	20.90	21.00	1.023	97.44	1.026	0.11	0.105	0.110
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	52	5260	SKU1	20.80	21.00	1.047	97.44	1.026	0.01	0.094	0.101
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	56	5280	SKU1	20.80	21.00	1.047	97.44	1.026	-0.03	0.094	0.101
	WLAN5GHz	802.11a 6Mbps	Bottom of Laptop	0mm	Ant 2	64	5320	SKU1	18.40	18.50	1.023	97.44	1.026	0.02	0.069	0.072
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 1	138	5690	SKU1	20.80	21.00	1.047	98.76	1.013	0.05	0.152	0.161
03	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 1	106	5530	SKU1	18.70	19.00	1.072	98.76	1.013	-0.11	0.156	0.169
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 1	106	5530	SKU2	18.70	19.00	1.072	98.76	1.013	-0.04	0.122	0.132
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 1	106	5530	SKU3	18.70	19.00	1.072	98.76	1.013	0.09	0.118	0.128
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 1	122	5610	SKU1	19.90	20.00	1.023	98.76	1.013	-0.09	0.153	0.159
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 2	138	5690	SKU1	20.90	21.00	1.023	98.75	1.013	0.07	0.153	0.159
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 2	138	5690	SKU2	20.90	21.00	1.023	98.75	1.013	0.06	0.132	0.137
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 2	138	5690	SKU3	20.90	21.00	1.023	98.75	1.013	-0.12	0.129	0.134
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 2	106	5530	SKU1	18.30	18.50	1.047	98.75	1.013	0.01	0.080	0.085
	WLAN5GHz	802.11ac-VHT80 MCS0	Bottom of Laptop	0mm	Ant 2	122	5610	SKU1	19.40	19.50	1.023	98.75	1.013	0.12	0.121	0.125
04	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 1	151	5755	SKU1	20.90	21.00	1.023	98.15	1.019	0.05	0.088	0.092
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 1	151	5755	SKU2	20.90	21.00	1.023	98.15	1.019	0.09	0.051	0.053
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 1	151	5755	SKU3	20.90	21.00	1.023	98.15	1.019	0.12	0.068	0.071
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 1	159	5795	SKU1	20.60	21.00	1.096	98.15	1.019	0.15	0.081	0.091
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 2	159	5795	SKU1	20.80	21.00	1.047	98.51	1.015	-0.03	0.054	0.057
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 2	159	5795	SKU2	20.80	21.00	1.047	98.51	1.015	-0.1	0.043	0.046
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 2	159	5795	SKU3	20.80	21.00	1.047	98.51	1.015	0.06	0.038	0.040
	WLAN5GHz	802.11n-HT40 MCS0	Bottom of Laptop	0mm	Ant 2	151	5755	SKU1	20.70	21.00	1.072	98.51	1.015	0.18	0.050	0.054



<Bluetooth SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Ch.	Freq. (MHz)	configure	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
05	Bluetooth	1Mbps	Bottom of Laptop	0mm	Ant 1	78	2480	SKU1	10.33	11.00	1.167	77.13	1.080	0.04	0.020	0.025
	Bluetooth	1Mbps	Bottom of Laptop	0mm	Ant 1	78	2480	SKU2	10.33	11.00	1.167	77.13	1.080	-0.06	0.009	0.011
	Bluetooth	1Mbps	Bottom of Laptop	0mm	Ant 1	78	2480	SKU3	10.33	11.00	1.167	77.13	1.080	0.05	0.015	0.019
	Bluetooth	1Mbps	Bottom of Laptop	0mm	Ant 1	0	2402	SKU1	10.01	11.00	1.256	77.13	1.297	-0.08	0.013	0.021
	Bluetooth	1Mbps	Bottom of Laptop	0mm	Ant 1	39	2441	SKU1	10.13	11.00	1.222	77.13	1.297	0.04	0.015	0.024

**13. Simultaneous Transmission Analysis**

NO.	Simultaneous Transmission Configurations	Body
1.	2.4GHz WLAN Ant 1 + 2.4GHz WLAN Ant 2	Yes
2.	2.4GHz WLAN Ant 2 + Bluetooth Ant 1	Yes
3.	5GHz WLAN Ant 1 + 5GHz WLAN Ant 2 + Bluetooth Ant 1	Yes

**General Note:**

- For SAR testing was performed on single antenna RF power in SISO mode is larger or equal to the single antenna RF power in MIMO mode, and for RF exposure assessment of MIMO mode simultaneous transmission exclusion analysis was performed with SAR test results of each antenna in SISO mode.
- WLAN and Bluetooth share the same antenna 1, and cannot transmit simultaneously.
- EUT will choose either WLAN 2.4GHz or WLAN 5GHz according to the network signal condition; therefore, 2.4GHz WLAN and 5GHz WLAN will not operate simultaneously at any moment.
- The Scaled SAR summation is calculated based on the same configuration and test position.
- Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
  - Scalar SAR summation < 1.6W/kg.
  - $SPLSR = (SAR1 + SAR2)^{1.5} / (\text{min. separation distance, mm})$ , and the peak separation distance is determined from the square root of  $[(x1-x2)^2 + (y1-y2)^2 + (z1-z2)^2]$ , where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.
  - If  $SPLSR \leq 0.04$ , simultaneously transmission SAR measurement is not necessary.
  - Simultaneously transmission SAR measurement, and the reported multi-band SAR < 1.6W/kg.

**13.1 Body Exposure Conditions**

Exposure Position	1	2	3	4	5	1+2 Summed 1g SAR (W/kg)	2+5 Summed 1g SAR (W/kg)	3+4+5 Summed 1g SAR (W/kg)
	2.4GHz WLAN Ant 1	2.4GHz WLAN Ant 2	5GHz WLAN Ant 1	5GHz WLAN Ant 2	Bluetooth Ant 1			
	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)			
Bottom of Laptop at 0mm	0.432	0.264	0.169	0.159	0.025	<b>0.696</b>	<b>0.289</b>	<b>0.353</b>

**Test Engineer :** Thomas Wang and Bob Cheng



## **14. Uncertainty Assessment**

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, 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. For this device, the highest measured 1-g SAR is less 1.5W/kg. Therefore, the measurement uncertainty table is not required in this report.

## **15. References**

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [2] ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3] 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", Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v02r02, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Oct 2015.
- [6] FCC KDB 447498 D01 v06, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Oct 2015
- [7] FCC KDB 616217 D04 v01r02, "SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers", Oct 2015
- [8] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [9] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.