

# TEST REPORT

Reference No..... : WTX23X10231915W003  
FCC ID ..... : JFZTWX7L  
Applicant ..... : Audio-Technica Corporation  
Address ..... : 2-46-1 Nishi-naruse, Machida, Tokyo 194-8666, Japan  
Manufacturer ..... : The same as Applicant  
Address ..... : The same as Applicant  
Product Name ..... : Wireless Headphones  
Model No..... : ATH-TWX7L  
Standards ..... : FCC Part 2.1093,  
IEEE Std C95.1: 2019  
IEEE Std C95.3: 2002 + Rev. 2008  
IEC/IEEE 62209-1528 Ed. 1.0 (2020-10)  
Date of Receipt sample .... : 2023-10-30  
Date of Test..... : 2023-10-30 to 2023-11-01  
Date of Issue ..... : 2023-11-01  
Test Report Form No. .... : WTX\_Part2\_1093W  
Test Result..... : **Pass**

Remarks:

The results shown in this test report refer only to the sample(s) tested, this test report cannot be reproduced, except in full, without prior written permission of the company. The report would be invalid without specific stamp of test institute and the signatures of approver.

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**Report version**

Version No.	Date of issue	Description
Rev.00	2023-11-01	Original
/	/	/

## 1. General Information

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### 1.1 Product Description for Equipment Under Test (EUT)

General Description of EUT	
Product Name:	Wireless Headphones
Trade Name:	audio-technica
Model No.:	ATH-TWX7L
Adding Model(s):	/
Rated Voltage:	Battery 3.85V
Battery Capacity:	72mAh
Power Adapter Model:	/
<i>Note: The test data is gathered from a production sample provided by the manufacturer.</i>	

Technical Characteristics of EUT:	
Bluetooth	
Bluetooth Version:	Bluetooth V5.3
Frequency Range:	2402-2480MHz
RF Output Power:	12.50dBm (Conducted)
Modulation:	GFSK, $\pi/4$ DQPSK, 8DPSK
Quantity of Channels:	79/40
Channel Separation:	1MHz/2MHz
Antenna Type:	LDS Antenna
Antenna Gain:	-2.1dBi
<i>Note: The Antenna Gain is provided by the customer and can affect the validity of results.</i>	

## 1.2 Test Standards

The following report is accordance with FCC 47 CFR Part 2.1093, IEEE Std C95.1: 2019, IEEE Std C95.3: 2002 + Rev. 2008, IEC/IEEE 62209-1528 Ed. 1.0 (2020-10), and KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02 and KDB 616217 D04 v01r02 and 248227 D01 802 11 Wi-Fi SAR v02r02.

The objective is to determine compliance with FCC Part 2.1093 of the Federal Communication Commissions rules.

**Maintenance of compliance** is the responsibility of the manufacturer. Any modification of the product, which is result in lowering the emission, should be checked to ensure compliance has been maintained.

## 1.3 Test Methodology

All measurements contained in this report were conducted with KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02. The public notice KDB 447498 D01 v06 for Mobile and Portable Devices RF Exposure Procedure also.

## 1.4 Test Facility

Address of the test laboratory

Laboratory: Waltek Testing Group (Shenzhen) Co., Ltd.

Address: 1/F., Room 101, Building 1, Hongwei Industrial Park, Liuxian 2nd Road, Block 70 Bao'an District, Shenzhen, Guangdong, China

### **FCC – Registration No.: 125990**

Waltek Testing Group (Shenzhen) Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the FCC (Federal Communications Commission). The acceptance letter from the FCC is maintained in our files. The Designation Number is CN5010. Test Firm Registration Number is 125990.

### **Industry Canada (IC) Registration No.: 11464A**

The 3m Semi-anechoic chamber of Waltek Testing Group (Shenzhen) Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 11464A.

## 2. Summary of Test Results

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The maximum results of Specific Absorption Rate (SAR) have found during testing are as follows:

Frequency Band	Body (0mm Gap)	SAR <sub>1g</sub> Limit (W/kg)
	Maximum SAR <sub>1g</sub> (W/kg)	
Bluetooth_ Left ear	0.347	1.6
Simultaneous	0.601	1.6

The 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 2.1093 and IEEE Std C95.1: 2019, and had been tested in accordance with the measurement methods and procedure specified in KDB 865664 D01 v01r04, KDB 865664 D02 v01r02 and IEC 62209-2:2010+AMD1 (2019).

### 3. Specific Absorption Rate (SAR)

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#### 3.1 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.

#### 3.2 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:

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

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

SAR measurement can be either related to the temperature elevation in tissue by

$$\text{SAR} = C \left( \frac{\delta T}{\delta t} \right)$$

Where: C is the specific heat capacity,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the electrical field in the tissue by

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

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

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

## 4. SAR Measurement System

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### 4.1 The Measurement System

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



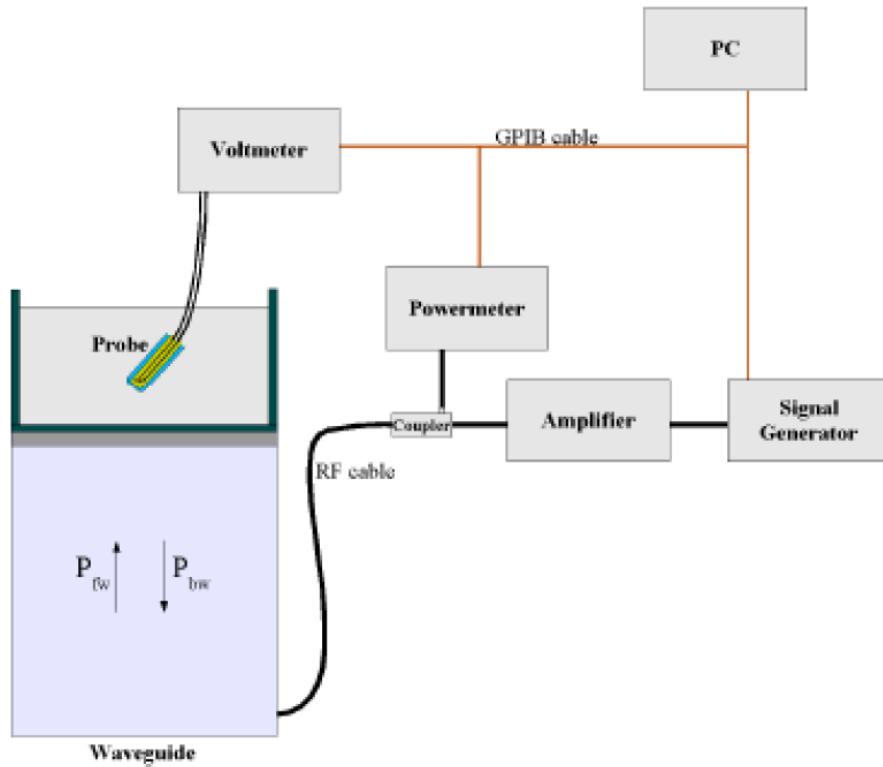
The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

### 4.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SSE2 SN 18/21 EPGO356, and refer to the calibration report for probe parameters.

Probe calibration is realized, in compliance with EN 62209-1 and IEC/IEEE 62209-1528 Ed. 1.0 (2020-10) STD, with CALISAR, Antenna proprietary calibration system. The calibration is performed with the EN 62209-1 annexes technique using reference guide at the five frequencies.





$$SAR = \frac{4(P_{fw} - P_{bw})}{ab\delta} \cos^2\left(\pi \frac{y}{a}\right) e^{-2z/\delta}$$

Where :

$P_{fw}$  = Forward Power

$P_{bw}$  = Backward Power

a and b =Waveguide dimensions

$\delta$  = Skin depth

Keithley configuration:

Rate = Medium; Filter = ON; RDGS = 10; Filter type = Moving Average; Range auto after each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors,  $CF(N)$ , for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N) = SAR(N) / V_{lin}(N) \quad (N=1,2,3)$$

The linearised output voltage  $V_{lin}(N)$  is obtained from the displayed output voltage  $V(N)$  using

$$V_{lin}(N) = V(N) * (1 + V(N) / DCP(N)) \quad (N=1,2,3)$$

where DCP is the diode compression point in mV.

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### 4.3 Probe Calibration Process

#### Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm<sup>2</sup>) using an with CALISAR, Antenna proprietary calibration system.

#### Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1mW/cm<sup>2</sup>.

#### Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$SAR = C \frac{\Delta T}{\Delta t}$$

Where:

- Δ t = exposure time (30 seconds),
- C = heat capacity of tissue (brain or muscle),
- Δ T = temperature increase due to RF exposure.

SAR is proportional to ΔT/Δt, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

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

Where:

- σ = simulated tissue conductivity,
- ρ = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

### 4.4 Phantom

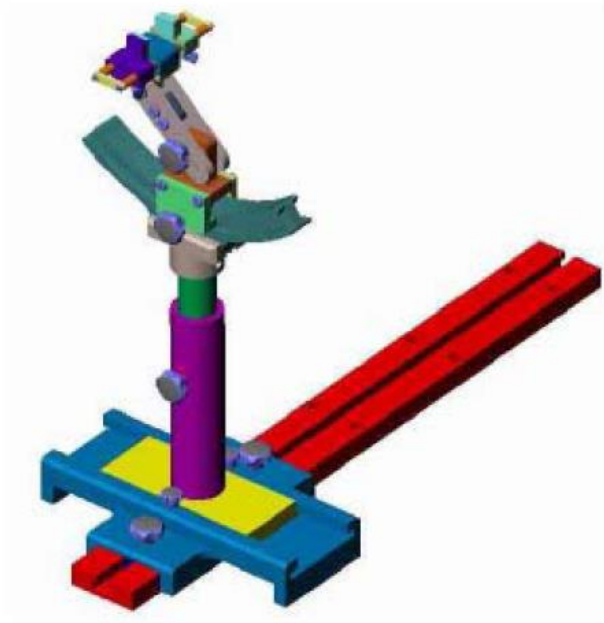
For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a

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cover, which prevents the evaporation of the liquid.

#### 4.5 Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1°.



System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

#### 4.6 Test Equipment List

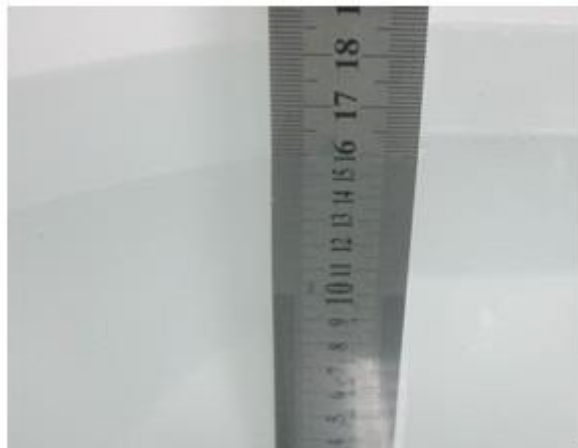
Fixed asset Number	Description	Manufacturer	Model	Serial Number	Cal. Date	Due. Date
WTXE1053A1006	E-Field Probe	MVG	SSE2	SN 18/21 EPGO356	2023-07-07	2024-07-06
WTXE1053A1001-007	2450MHz Dipole	MVG	SID2450	SN 13/15 DIP 2G450-364	2023-08-20	2026-08-19
WTXE1053A1001-010	Dielectric Probe	SATIMO	SCLMP	SN 47/12 OCPG49	2023-02-25	2024-02-24
WTXE1075A1003	Power meter	Keithley	3500	1232959	2023-02-25	2024-02-24
WTXE1075A1001	Power meter	Keithley	3500	1162591	2023-02-25	2024-02-24
WTXE1104A1003	EXG Analog Signal Generator	KEYSIGHT	N5173B	MY61252892	2023-02-25	2024-02-24
WTXE1022A1002	GSM Tester	Rohde & Schwarz	CMU200	114403	2023-02-25	2024-02-24
WTXE1041A1002	Communications Tester	Rohde & Schwarz	CMW500	148650	2023-02-25	2024-02-24
WTXE1036A1001	Network Analyzer	HP	85047A	2901A00831	2023-02-25	2024-02-24

## 5. Tissue Simulating Liquids

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### 5.1 Composition of Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with SMTIMO, 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. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. Please see the following photos for the liquid height.



Liquid Height for Body SAR

### The Composition of Tissue Simulating Liquid

Frequency (MHz)	Water (%)	Salt (%)	1,2-Propane diol (%)	HEC (%)	Preventol (%)	DGBE (%)
<b>Head</b>						
2450	55.0	0.1	0	0	0	44.9

## 5.2 Tissue Dielectric Parameters for Head and Body Phantoms

According to FCC KDBs, IEC/IEEE 62209-1528 Ed. 1.0 (2020-10) and CEI/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

Target Frequency (MHz)	Head		Body	
	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
150	0.76	52.3	0.80	61.9
300	0.87	45.3	0.92	58.2
450	0.87	43.5	0.94	56.7
750	0.89	41.9	0.96	55.5
835	0.90	41.5	0.97	55.2
900	0.97	41.5	1.05	55.0
915	0.98	41.5	1.06	55.0
1450	1.20	40.5	1.30	54.0
1610	1.29	40.3	1.40	53.8
1800-2000	1.40	40.0	1.52	53.3
2300	1.67	39.5	1.81	52.9
<b>2450</b>	<b>1.80</b>	<b>39.2</b>	<b>1.95</b>	<b>52.7</b>
2600	1.96	39.0	2.16	52.5
3000	2.40	38.5	2.73	52.0
5200	4.66	36.0	5.30	49.0
5400	4.86	35.8	5.53	48.7
5600	5.07	35.5	5.77	48.5
5800	5.27	35.3	6.00	48.2

### 5.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using COMOSAR Dielectric Probe Kit and an Agilent Network Analyzer.

#### Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

Head Tissue Simulating Liquid									
Freq. MHz.	Temp. (°C)	Conductivity			Permittivity			Limit (%)	Date
		Reading ( $\sigma$ )	Target ( $\sigma$ )	Delta (%)	Reading ( $\epsilon_r$ )	Target ( $\epsilon_r$ )	Delta (%)		
2450	21.2	1.83	1.80	1.67	40.06	39.2	2.19	±5	2023-10-31

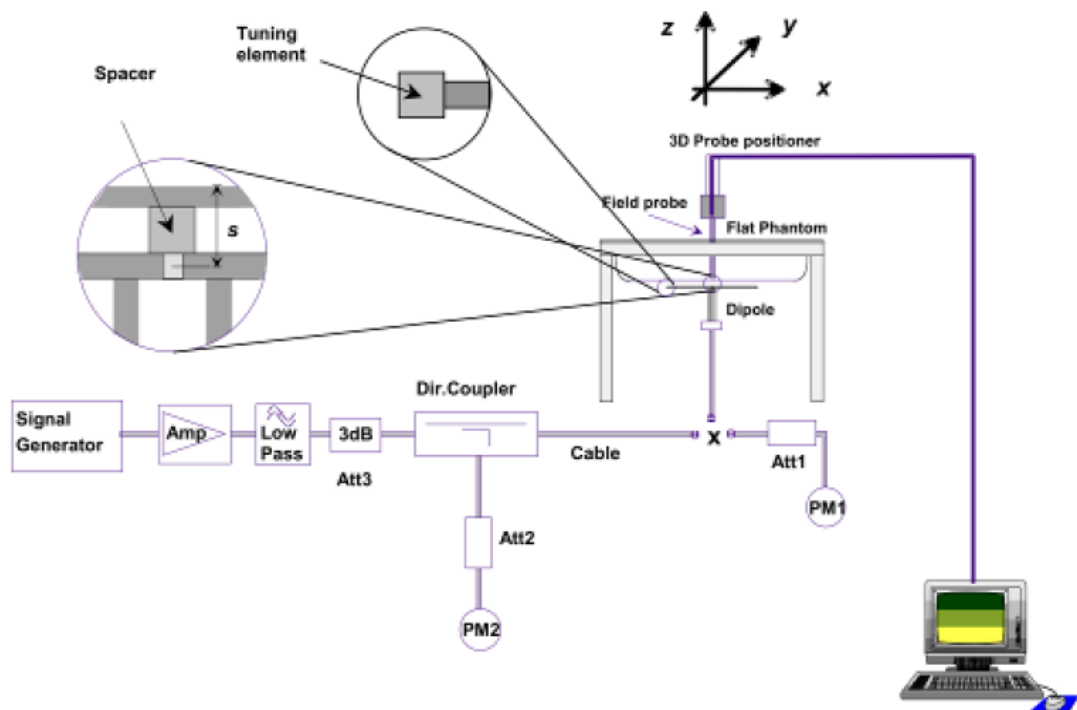
## 6. SAR Measurement Evaluation

### 6.1 Purpose of System Performance Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

### 6.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 2450MHz and 5000MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom.



System Verification Setup Block Diagram





**Setup Photo of Dipole Antenna**

The output power on dipole port must be calibrated to 24 dBm(250 mW) before dipole is connected.

### 6.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. Table 6.1 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.

Frequency	Targeted SAR <sub>1g</sub>	Measured SAR <sub>1g</sub>	Normalized SAR <sub>1g</sub>	Tolerance	Date
MHz	(W/kg)	(W/kg)	(W/kg)	(%)	
Head					
250	50.33	12.126	48.504	-3.63	2023-10-31

Targeted and Measurement SAR

***Please refer to Annex A for the plots of system performance check.***

## 7. EUT Testing Position

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### 7.1 DUTs with alternative form factor

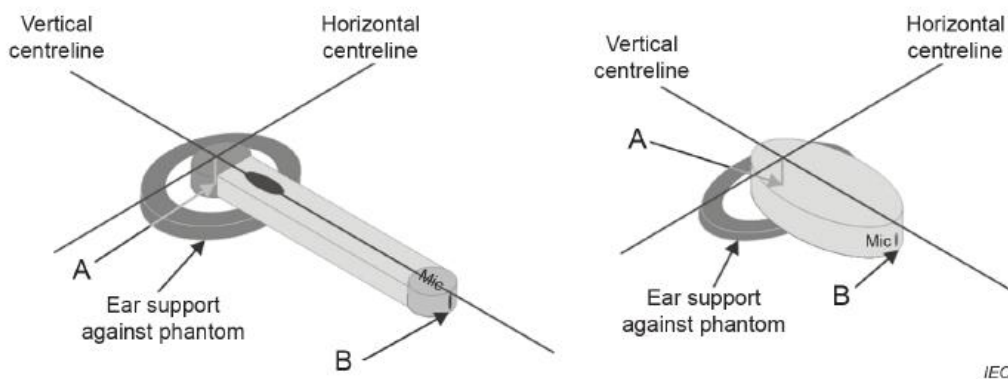
Referring to IEC-IEEE 62209-1528-2020:

The basic principles identified and specified in 7.2.4 may be applied to devices with similar form factors. Wireless headsets (e.g. connected by Bluetooth) are examples of head-mounted devices that may be evaluated by applying these principles.

The geometry and coordinate mapping system shown in Figure 18 is applicable. Point A, being the acoustic output, is located at the mid-point of the width, and point B, being the primary microphone, is located at the bottom of the device (the end closest to the mouth). Note that for the purpose of applying the positioning procedures, the DUT is considered to be a conventional bar type (rectangular, cuboid) form factor.

Prior to using 7.2.7, consideration shall be made of the available operating modes and the maximum operating power levels, because some devices might not require testing.

All details relating to alternative form factor DUTs shall be fully documented in the measurement report, including diagrams or photographs. Sound engineering practice shall be applied to implement the mapping of an alternate form factor device.



**Figure 18 – An alternative form factor DUT with reference points and reference lines**

## 7.2 EUT Testing Position

Body mode SAR assessments are required for this device. This EUT was tested in different positions for different SAR test modes, more information as below:

Body SAR tests, Test distance: 0mm						
Antennas	Front	Back	Right Side	Left Side	Top Side	Bottom Side
Bluetooth	Yes	Yes	Yes	Yes	Yes	Yes

**Remark:**

1. Referring to KDB 447498 D01 v06, this device is overall diagonal dimension(>20cm) tablet, tested in direct contact (no gap) with flat phantom.

***Please refer to Annex for the SAR test setup photos.***

## 8. SAR Measurement Procedures

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### 8.1 Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the highest power channel.
- (b) Keep EUT to radiate maximum output power or 100% factor (if applicable)
- (c) Measure output power through RF cable and power meter.
- (d) Place the EUT in the positions as Annex D demonstrates.
- (e) Set scan area, grid size and other setting on the SATIMO software.
- (f) Measure SAR results for the highest power channel on each testing position.
- (g) Find out the largest SAR result on these testing positions of each band
- (h) Measure SAR results for other channels in worst SAR testing position if the 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

### 8.2 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 SATIMO 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. 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
- (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 3D 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

### **8.3 Area & Zoom Scan Procedures**

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures 5x5x7 points with step size 8, 8 and 5 mm for 300 MHz to 3 GHz, and 8x8x8 points with step size 4, 4 and 2.5 mm for 3 GHz to 6 GHz. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g.

### **8.4 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 (step-size is 4, 4 and 2.5 mm). When all volume scan were completed, the software can combine and subsequently superpose these measurement data to calculating the multiband SAR.

### **8.5 SAR Averaged Methods**

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10g and 1 g requires a very fine resolution in the three dimensional scanned data array.

### **8.6 Power Drift Monitoring**

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In SATIMO 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 drift more than 5%, the SAR will be retested.

## 9. SAR Test Result

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### 9.1 Conducted RF Output Power

#### Bluetooth\_ BR/EDR mode - Maximum Average Power

Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Duty Factor (dB)	Total Conducted Power (dBm)	Total Conducted Power (mW)
NVNT	1-DH5	2402	Ant1	11.39	0	11.39	13.77
NVNT	1-DH5	2441	Ant1	<b>12.28</b>	0	12.28	16.9
NVNT	1-DH5	2480	Ant1	12.28	0	12.28	16.9
NVNT	2-DH5	2402	Ant1	7.31	0	7.31	5.38
NVNT	2-DH5	2441	Ant1	8.21	0	8.21	6.62
NVNT	2-DH5	2480	Ant1	8.31	0	8.31	6.78
NVNT	3-DH5	2402	Ant1	7.25	0	7.25	5.31
NVNT	3-DH5	2441	Ant1	8.2	0	8.2	6.61
NVNT	3-DH5	2480	Ant1	8.33	0	8.33	6.81

#### Bluetooth\_ BR/EDR mode Maximum Peak Conducted Output Power

Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Duty Factor (dB)	Total Conducted Power (dBm)	Total Conducted Power (mW)
NVNT	1-DH5	2402	Ant1	11.71	0	11.71	14.83
NVNT	1-DH5	2441	Ant1	12.46	0	12.46	17.62
NVNT	1-DH5	2480	Ant1	12.5	0	12.5	17.78
NVNT	2-DH5	2402	Ant1	9.91	0	9.91	9.79
NVNT	2-DH5	2441	Ant1	10.74	0	10.74	11.86
NVNT	2-DH5	2480	Ant1	10.94	0	10.94	12.42
NVNT	3-DH5	2402	Ant1	10.45	0	10.45	11.09
NVNT	3-DH5	2441	Ant1	11.24	0	11.24	13.3
NVNT	3-DH5	2480	Ant1	11.35	0	11.35	13.65

**Bluetooth\_ BLE mode - Maximum Average Power**

Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Duty Factor (dB)	Total Conducted Power (dBm)	Total Conducted Power (mW)
NVNT	BLE 1M	2402	Ant1	0.17	2.01	2.18	1.65
NVNT	BLE 1M	2440	Ant1	0.73	2.01	2.74	1.88
NVNT	BLE 1M	2480	Ant1	0.68	1.97	2.65	1.84
NVNT	BLE 2M	2402	Ant1	-2.58	4.77	2.19	1.66
NVNT	BLE 2M	2440	Ant1	-1.88	4.77	2.89	1.95
NVNT	BLE 2M	2480	Ant1	-1.97	4.77	2.8	1.91

**Bluetooth\_ BLE mode - Maximum Peak Conducted Output Power**

Condition	Mode	Frequency (MHz)	Antenna	Conducted Power (dBm)	Duty Factor (dB)	Total Conducted Power (dBm)	Total Conducted Power (mW)
NVNT	BLE 1M	2402	Ant1	2.67	0	2.67	1.85
NVNT	BLE 1M	2440	Ant1	3.27	0	3.27	2.12
NVNT	BLE 1M	2480	Ant1	3.07	0	3.07	2.03
NVNT	BLE 2M	2402	Ant1	2.64	0	2.64	1.84
NVNT	BLE 2M	2440	Ant1	3.14	0	3.14	2.06
NVNT	BLE 2M	2480	Ant1	2.86	0	2.86	1.93

## 9.2 Test Results for Standalone SAR Test

### Body SAR

Bluetooth–Body SAR Test(0mm)									
Plot No.	Mode	Test Position	Frequency		Output Power (dBm)	Rated Limit (dBm)	Scaling Factor	SAR1g (W/kg)	Scaled SAR1g (W/kg)
			CH.	MHz					
1.	1-DH5	Back Side	39	2441	12.28	13.0	1.180	0.294	<b>0.347</b>
	1-DH5	Front Side	39	2441	12.28	13.0	1.180	0.015	0.018
	1-DH5	Right Side	39	2441	12.28	13.0	1.180	0.204	0.241
	1-DH5	Left Side	39	2441	12.28	13.0	1.180	0.185	0.218
	1-DH5	Top Side	39	2441	12.28	13.0	1.180	0.100	0.118
	1-DH5	Bottom Side	39	2441	12.28	13.0	1.180	0.011	0.013

#### Remark:

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is  $\geq 1.45$  W/kg (~ 10% from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is  $\geq 1.5$  W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.



### 9.3 Simultaneous Multi-band Transmission SAR Analysis

#### List of Mode for Simultaneous Multi-band Transmission

No.	Configurations	Body SAR
1	Bluetooth_ Right ear (Data) + Bluetooth_ Left ear (Data)	Yes

#### Remark:

1. According to the KDB 447498 D01 v06, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

$(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \cdot [\sqrt{f(\text{GHz})} / x]$

W/kg for test separation distances  $\leq 50$  mm;

where  $x = 7.5$  for 1-g SAR, and  $x = 18.75$  for 10-g SAR.

2. The maximum SAR summation is calculated based on the same configuration and test position.

#### Body SAR

Position	Bluetooth_ Right ear	Bluetooth_ Left ear	Summed SAR (W/kg)
	Scaled SAR (W/kg)	Scaled SAR (W/kg)	
Back Side	0.254	0.347	0.601
Front Side	0.072	0.018	0.090
Right Side	0.056	0.241	0.297
Left Side	0.181	0.218	0.399
Top Side	0.052	0.118	0.170
Bottom Side	0.016	0.013	0.029

## 10. Measurement Uncertainty

### 10.1 Uncertainty for SAR Test

a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
<b>Measurement System</b>									
Probe calibration	E.2.1	7.0	N	1	1	1	7.00	7.00	$\infty$
Axial Isotropy	E.2.2	2.5	R	$\sqrt{3}$	$(1_{Cp})^{1/2}$	$(1_{Cp})^{1/2}$	1.02	1.02	$\infty$
Hemispherical Isotropy	E.2.2	4.0	R	$\sqrt{3}$	$(Cp)^{1/2}$	$(Cp)^{1/2}$	1.63	1.63	$\infty$
Boundary effect	E.2.3	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	$\infty$
Linearity	E.2.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	$\infty$
System detection limits	E.2.5	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	$\infty$
Readout Electronics	E.2.6	0.02	N	1	1	1	0.02	0.02	$\infty$
Reponse Time	E.2.7	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	$\infty$
Integration Time	E.2.8	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	$\infty$
RF ambient Conditions – Noise	E.6.1	0	R	$\sqrt{3}$	1	1	1.73	1.73	$\infty$
RF ambient Conditions - Reflections	E.6.1	0	R	$\sqrt{3}$	1	1	1.73	1.73	$\infty$
Probe positioner Mechanical Tolerance	E.6.2	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	$\infty$
Probe positioning with respect to Phantom Shell	E.6.3	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	$\infty$
Extrapolation, interpolation and integration Algorithms for Max. SAR Evaluation	E.5	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	$\infty$
<b>Test Sample Related</b>									
Test sample positioning	E.4.2	0.03	N	1	1	1	0.03	0.03	N-1
Device Holder Uncertainty	E.4.1	5.00	N	1	1	1	5.00	5.00	
Output power Variation - SAR drift measurement	E.2.9	12.02	R	$\sqrt{3}$	1	1	6.94	6.94	$\infty$
SAR scaling	E6.5	0.0	R	$\sqrt{3}$	1	1	0.0	0.0	$\infty$
<b>Phantom and Tissue Parameters</b>									
Phantom Uncertainty (Shape and thickness tolerances)	E.3.1	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	$\infty$
Uncertainty in SAR correction for deviations in permittivity and conductivity	E3.2	1.9	R	$\sqrt{3}$	1	0.84	1.10	0.90	$\infty$

Liquid conductivity - deviation from target value	E.3.2	0	R	$\sqrt{3}$	0	0.43	0	0	$\infty$
Liquid conductivity - measurement uncertainty	E.3.3	4.00	N	1	0.64	0.43	1.10	1.10	$\infty$
Liquid permittivity - deviation from target value	E.3.2	0	R	$\sqrt{3}$	0	0.49	0	0	$\infty$
Liquid permittivity - measurement uncertainty	E.3.3	5.00	N	1	0.6	0.49	1.47	1.47	$\infty$
Combined Standard Uncertainty			RSS				10.20	10.00	
Expanded Uncertainty (95% Confidence interval)			K=2				20.40	20.00	

## Annex A. Plots of System Performance Check

# MEASUREMENT 1

Type: Validation measurement (Fast, 75.00 %)

Date of measurement: 2023-10-31

Measurement duration: 12 minutes 21 seconds

E-field Probe: SSE2 - SN 18/21 EPGO356; ConvF: 2.29; Calibrated: 2023-07-07

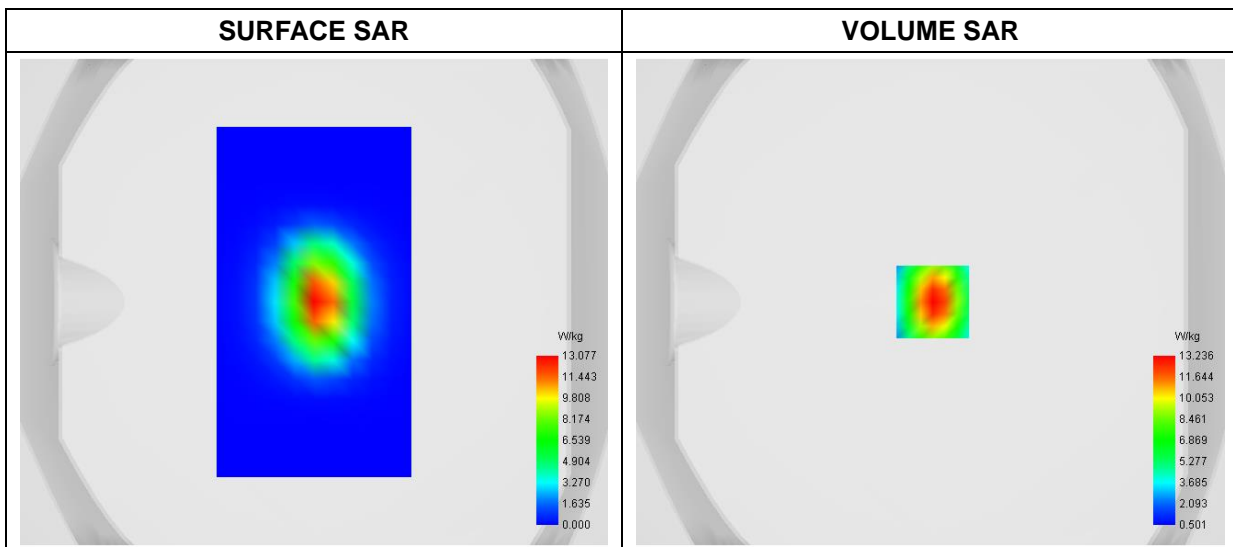
### A. Experimental conditions

<b>Area Scan</b>	dx=8mm dy=8mm
<b>Zoom Scan</b>	dx=5mm dy=5mm dz=4mm
<b>Phantom</b>	Validation plane
<b>Device Position</b>	Dipole
<b>Band</b>	CW2450
<b>Signal</b>	CW (Crest factor: 1.0)

### B. SAR Measurement Results

<b>Frequency (MHz)</b>	2450.000000
<b>Relative Permittivity (real part)</b>	40.062289
<b>Conductivity (S/m)</b>	1.831828
<b>Power Variation (%)</b>	1.475200
<b>Ambient Temperature</b>	21.2
<b>Liquid Temperature</b>	21.2

### C. SAR Surface and Volume

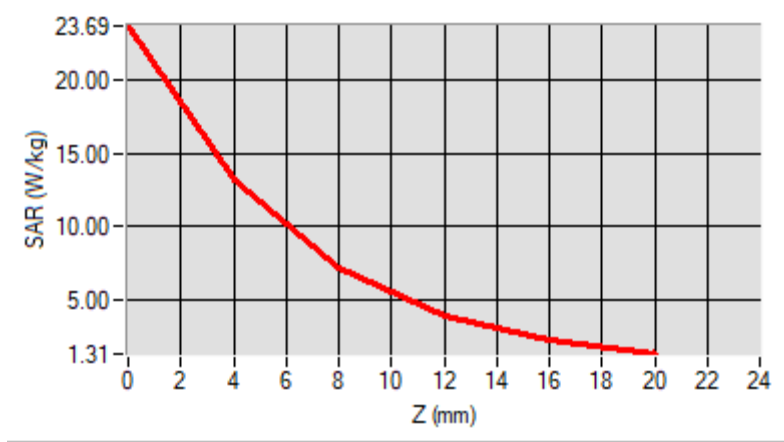


**Maximum location: X=1.00, Y=0.00  
D. SAR 1g & 10g**

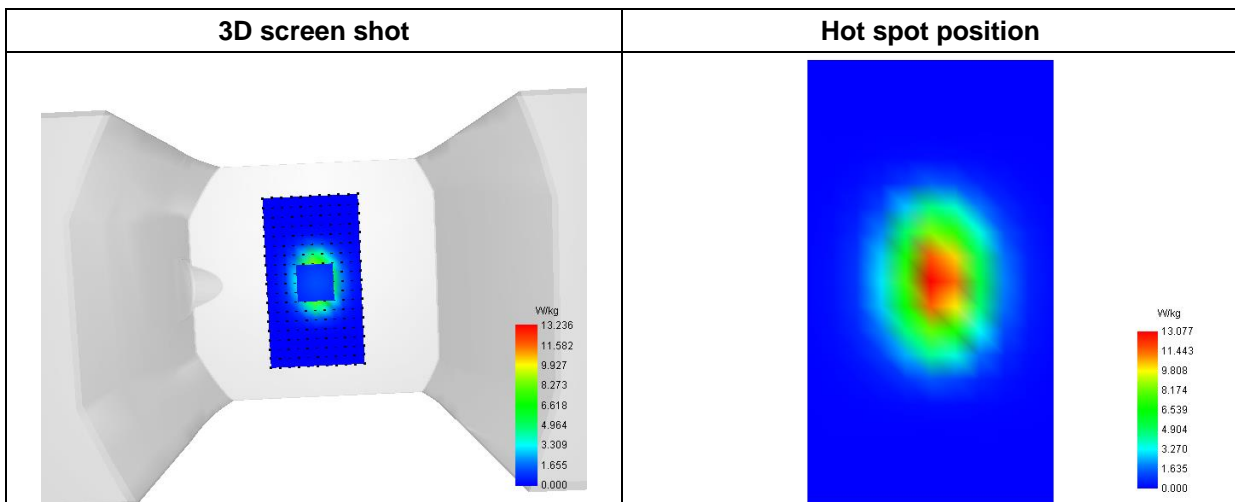
<b>SAR 10g (W/Kg)</b>	<b>5.846344</b>
<b>SAR 1g (W/Kg)</b>	<b>12.126085</b>

**E. Z Axis Scan**

<b>Z (mm)</b>	<b>0.00</b>	<b>4.00</b>	<b>8.00</b>	<b>12.00</b>	<b>16.00</b>
<b>SAR (W/Kg)</b>	<b>23.6924</b>	<b>13.2363</b>	<b>7.1523</b>	<b>3.9032</b>	<b>2.2625</b>



**F. 3D Image**



## Annex B. Plots of SAR Measurement

# MEASUREMENT 1

Type: Measurement (Complete)

Date of measurement: 2023-10-31

Measurement duration: 12 minutes 3 seconds

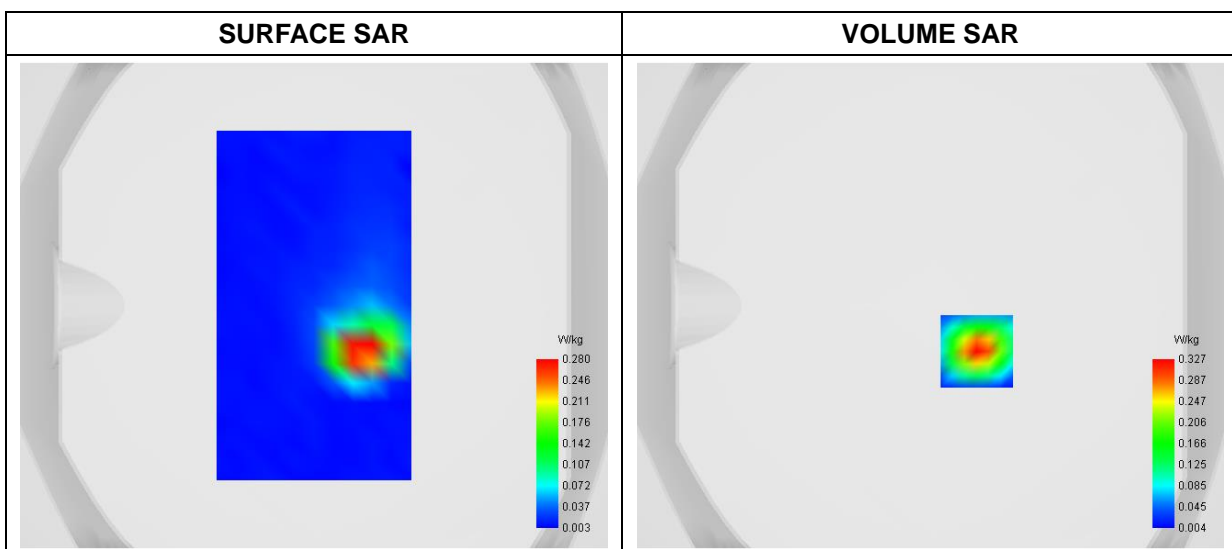
### A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=5mm dy=5mm dz=4mm
Phantom	Flat Plane
Device Position	Back
Band	Bluetooth_1-DH5
Channels	Middle
Signal	Duty Cycle 1:1

### B. SAR Measurement Results

Frequency (MHz)	2441.000000
Relative Permittivity (real part)	40.061645
Conductivity (S/m)	1.831275
Power Variation (%)	1.415500
Ambient Temperature	21.2
Liquid Temperature	21.2

### C. SAR Surface and Volume

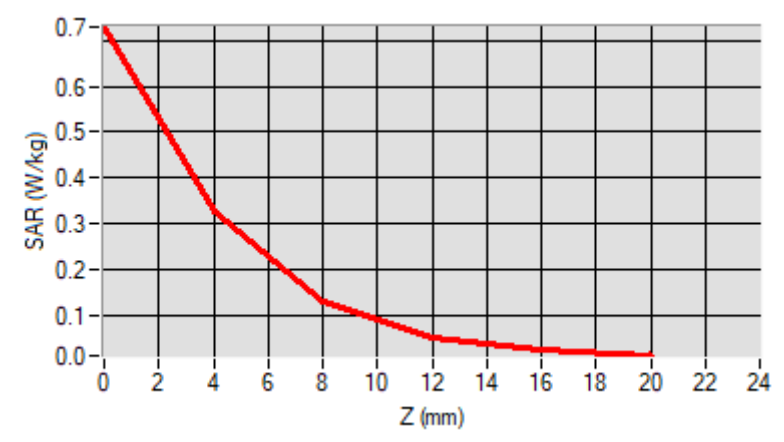


Maximum location: X=19.00, Y=-19.00  
 D. SAR 1g & 10g

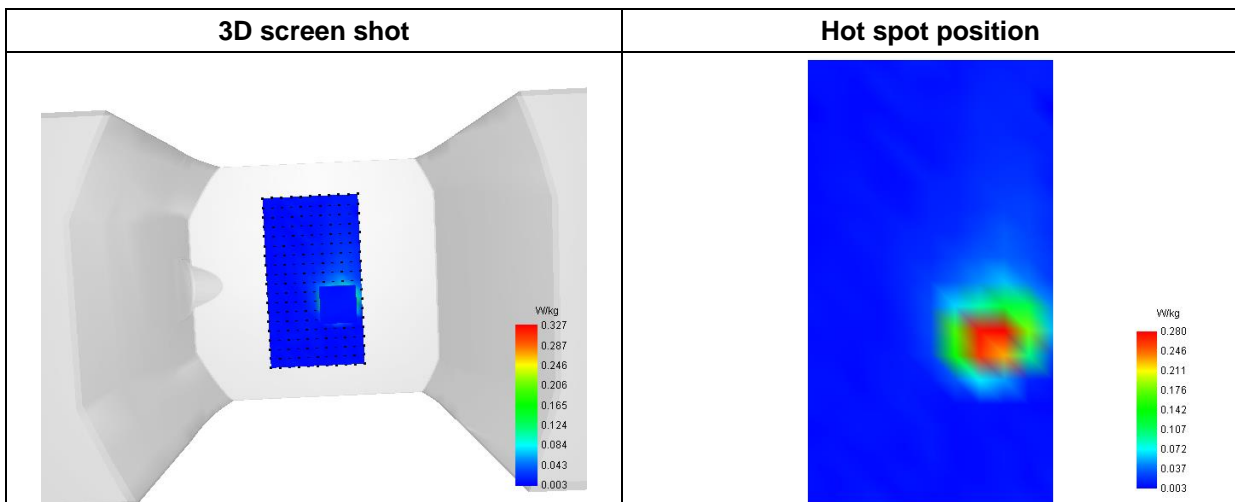
SAR 10g (W/Kg)	0.110804
SAR 1g (W/Kg)	0.294336

E. Z Axis Scan

Z (mm)	0.00	4.00	8.00	12.00	16.00
SAR (W/Kg)	0.7298	0.3274	0.1312	0.0506	0.0225



F. 3D Image



## **Annex D. Calibration Certificate**

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*Please refer to the exhibit for the calibration certificate*

**\*\*\*\*\* END OF REPORT \*\*\*\*\***