

SAR EVALUATION REPORT

FCC 47 CFR § 2.1093 IEEE Std. 1528-2013

For

Scene controller

FCC ID: K7S-08346 Model Name: WSC010

Report Number: 4790053747-SAR-2

Issue Date: August 24, 2021

Prepared for

Belkin International, Inc.

12045 East Waterfront Dr., Playa Vista, CA, United States

Prepared by

UL Verification Services (Guangzhou) Co., Ltd, Song Shan Lake Branch Building 10, Innovation Technology Park, No. 1, Li Bin Road, Song Shan Lake Hi-Tech Development Zone Dongguan, People's Republic of China

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Revision History

| Rev. | Date | Revisions | Revised By |
|------|-----------------|---------------|------------|
| V1.0 | August 24, 2020 | Initial Issue | \ |
| | | | |
| | | | |
| | | | |

Note:

1. The Measurement result for the sample received is<Pass> according to < IEEE Std. 1528-2013> when <Accuracy Method> decision rule is applied.

2. This test report is only published to and used by the applicant, and it is not for evidence purpose in China.

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1. Attestation of Test Results

| Applicant Name | Belkin International, Inc. | | | | | |
|---|---|--|--|--|--|--|
| Address | 12045 East Waterfront Dr., Playa Vista, CA, United States | | | | | |
| EUT Name | Scene controller | | | | | |
| Model Name | WSC010 | | | | | |
| Sample Status | Normal | | | | | |
| Sample Received Date | August 23, 2021 | | | | | |
| Date of Tested | August 23, 2021~ August 24, 2021 | | | | | |
| Applicable Standards | FCC 47 CFR § 2.1093 IEEE Std. 1528-2013 KDB publication | | | | | |
| SAR Limits (W/Kg) | · · · · | | | | | |
| Exposure Category | Peak spatial-average(1g of tissue) | Extremities (hands, wrists, ankles, etc.) (10g of tissue) | | | | |
| General population / Uncontrolled exposure | 1.6 | 4 | | | | |
| The Highest Reported SAR (W/kg) | | | | | | |
| DE Experiero Conditiono | Equipment Class | | | | | |
| RF Exposure Conditions | DTS | Thread | | | | |
| Extremities (10-g) | 0.014 | 0.014 | | | | |
| Simultaneous Transmission (10-g) | 1 | | | | | |
| Test Results | Pass | | | | | |
| Prepared By: | Reviewed By: | Approved By: | | | | |
| Dean Hua | Shemalien Gephensin | | | | | |
| Dean Hua Engineer Project Associate | Shawn WenStephen GuoLaboratory LeaderLaboratory Manager | | | | | |

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2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with IEEE Std. 1528-2013, the following FCC Published RF exposure KDB procedures:

- 447498 D01 General RF Exposure Guidance V06
- 690783 D01 SAR Listings on Grants v01r03
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

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3. Facilities and Accreditation

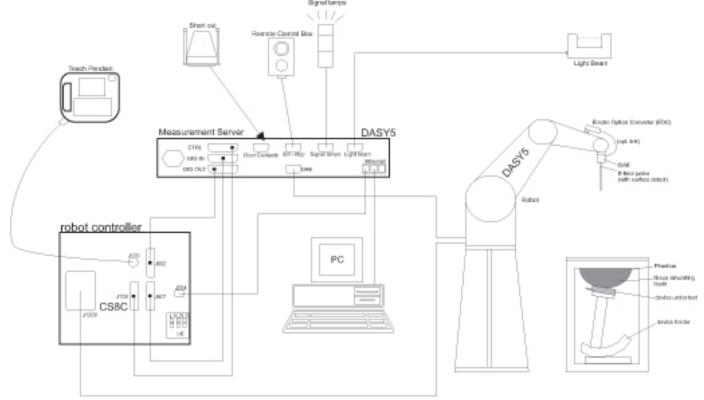
| Test Location | UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. |
|---------------|---|
| Address | Building 10, Innovation Technology Park, Song Shan Lake Hi tech Development Zone, Dongguan, 523808, China |
| | A2LA (Certificate No.: 4102.01) |
| | UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with A2LA. |
| | FCC (FCC Recognized No.: CN1187) |
| | UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been recognized to perform compliance testing on equipment subject to the Commission's Declaration of Conformity (DoC) and Certification rules |
| Accreditation | IC(Company No.: 21320) |
| Certificate | UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been registered and fully described in a report filed with Industry Canada. The Company Number is 21320. |
| | VCCI (Registration No.: G-20019, R-20004, C-20012 and T-20011) |
| | UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with VCCI, the Membership No. is 3793. |
| | Facility Name: Chamber D, the VCCI registration No. is G-20019 and R-20004 Shielding Room B , the VCCI registration No. is C-20012 and T-20011 |
| Description | All measurement facilities use to collect the measurement data are located at Building 10, Innovation Technology Park, Song Shan Lake Hi tech Development Zone, Dongguan, 523808, China |

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4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

The DASY5 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, ADconversion, 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 Win7 and the DASY52 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.

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4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in 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.

| | \leq 3 GHz | > 3 GHz | |
|---|--|---|--|
| Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface | $5 \pm 1 \text{ mm}$ | $\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$ | |
| Maximum probe angle from probe axis to phantom surface normal at the measurement location | $30^{\circ} \pm 1^{\circ}$ | $20^{\circ} \pm 1^{\circ}$ | |
| | \leq 2 GHz: \leq 15 mm 2 – 3 GHz: \leq 12 mm | $\begin{array}{l} 3-4 \ \mathrm{GHz:} \leq 12 \ \mathrm{mm} \\ 4-6 \ \mathrm{GHz:} \leq 10 \ \mathrm{mm} \end{array}$ | |
| Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area} | 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 \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device. | | |

Area Scan Parameters extracted from KDB 865664 D01 v01r04 SAR Measurement 100 MHz to 6 GHz

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Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

| Zoom Scan Parameters extracted from KDB 865664 D01 | 1 v01r04 SAR Measurement 100 MHz to 6 GHz |
|--|---|
|--|---|

| | | | \leq 3 GHz | > 3 GHz |
|---|------------------------------------|---|---|---|
| Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom} | | | $\leq 2 \text{ GHz:} \leq 8 \text{ mm}$ 2 - 3 GHz: $\leq 5 \text{ mm}^*$ | $3 - 4 \text{ GHz:} \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz:} \le 4 \text{ mm}^*$ |
| | uniform grid: $\Delta z_{Zoom}(n)$ | | \leq 5 mm | $3 - 4 \text{ GHz:} \le 4 \text{ mm}$ $4 - 5 \text{ GHz:} \le 3 \text{ mm}$ $5 - 6 \text{ GHz:} \le 2 \text{ mm}$ |
| Maximum zoom scan spatial resolution, normal to phantom surface | graded | $\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface | \leq 4 mm | $3 - 4$ GHz: ≤ 3 mm $4 - 5$ GHz: ≤ 2.5 mm $5 - 6$ GHz: ≤ 2 mm |
| | grid | Δz _{Zoom} (n>1): between subsequent points | $\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ | |
| Minimum zoom scan volume x, y, z | | $\geq 30 \text{ mm} \qquad \begin{array}{c} 3 - 4 \text{ GHz:} \geq 28 \\ 4 - 5 \text{ GHz:} \geq 25 \\ 5 - 6 \text{ GHz:} \geq 22 \end{array}$ | | |

Note: δ 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 <u>reported</u> SAR from the area scan based *1-g SAR estimation* procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

Step 5: Z-Scan (FCC only)

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation the extrapolated distance should not be greater than the step size in Z-direction.

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4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

| Name of equipment | Manufacturer | Type/Model | Serial No. | Cal. Due Date |
|----------------------------------|-------------------------|----------------------------|------------|------------------|
| ENA Network Analyzer | Keysight | E5080A | MY55100583 | 2021.12.04 |
| Dielectric Probe kit | SPEAG | SM DAK 040 SA | 1155 | NCR |
| DC power supply | Keysight | E36103A | MY55350020 | 2021.12.04 |
| Signal Generator | Rohde & Schwarz | SME06 | 837633\001 | 2021.12.04 |
| BI-Directional Coupler | WERLATONE | C8060-102 | 3423 | 2021.12.04 |
| Peak and Average Power Sensor | Keysight | E9323A | MY55440013 | 2021.12.05 |
| Peak and Average Power Sensor | Keysight | E9323A | MY55420006 | 2021.12.05 |
| Dual Channel PK Power Meter | Keysight | N1912A | MY55416024 | 2021.12.05 |
| Amplifier | CORAD TECHNOLOGY LTD | AMF-4D-00400600-50- 30P | 1983561 | NCR |
| Dosimetric E-Field Probe | SPEAG | EX3DV4 | 7383 | 2021.11.30 |
| Data Acquisition Electronic | SPEAG | DAE3 | 427 | 2022.4.8 |
| Dipole Kit 2450 MHz | • | | 977 | 2021.12.04 |
| Software | SPEAG | DASY52 | N/A | NCR |
| Twin Phantom | SPEAG | SAM V5.0 | 1805 | NCR |
| ELI Phantom | SPEAG | ELI V5.0 | 1235 | NCR |
| Thermometer | / | GX-138 150709653 | | 2021.12.09 |
| Thermometer | VICTOR | ITHX-SD-5 | 18470005 | 2021.12.10 |

Note:

 As per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix D.

- a) There is no physical damage on the dipole;
- b) System check with specific dipole is within 10% of calibrated value;
- c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement. Refer to App E Dipole calibration record.
- d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement. Refer to App E Dipole calibration record.
- 2) Dielectric assessment kit is calibrated against air, distilled water and a shorting block performed before measuring liquid parameters.
- 3) NCR is short for "No Calibration Requirement".

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5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std. 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

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6. Device Under Test (DUT) Information

6.1. DUT Description

The DUT is a remote controller with Bluetooth and Thread radio.

EUT Dimension Overall (Length x Width x Height): 66mm x 33 mm x 8mm

6.2. Wireless Technology

| Wireless technology | Frequency band | |
|---------------------|----------------|--|
| Bluetooth | 2.4GHz | |
| Thread | 2.4GHz | |

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7. Conducted Output Power Measurement and tune-up tolerance

General note:

1) As per KDB 447498 sec.4.1.d) at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.

7.1. Power measurement result of Bluetooth.

| Bond | Mode | Avera | Tung un | | |
|----------|------------|-------|---------|------|---------|
| Band | | 0CH | 19CH | 39CH | Tune-up |
| | GFSK 1Mbps | 7.12 | 7.32 | 7.21 | 8 |
| 2.4G BLE | GFSK 2Mbps | NMR | NMR | NMR | 6 |

Note:

- 1) NMR is short for "No measurement requirement".
- 2) The output power of the device was set to transmit at maximum power for all tests.
- 3) The maximum output power of mode 1M of BLE was selected as the primary mode to test SAR for 2.4G Bluetooth modes. SAR measurement is not required for other modes, when the secondary mode is ≤0.25 dB higher than the primary mode.

7.2. Power measurement result of Thread.

| Pand | Mode | Avera | Turne un | | |
|------|--------|-------|----------|------|---------|
| Band | wode | 11CH | 19CH | 26CH | Tune-up |
| 2.4G | Thread | 7.35 | 7.67 | 7.71 | 8 |

Note:

1) The output power of the device was set to transmit at maximum power for all tests.

7.3. Duty Factor Measured Results

| Test Mode | On Time (msec) | Period (msec) | Duty Cycle x (Linear) | Duty Cycle (%) | Duty Cycle Correction Factor (dB) | 1/T Minimum VBW (kHz) | Final setting For VBW (kHz) |
|-----------|-------------------|------------------|-----------------------------|-------------------|--|--------------------------------|-----------------------------------|
| BLE_1M | 2.15 | 2.50 | 0.8600 | 86.00 | 0.66 | 0.47 | 0.5 |

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| n Spa | | .00 | RF 000 | 50 0000 H | | | Fast n:Low | • • | Trig Delay-2.00 Trig: Video #Atten: 40 dB | Oms #Av | align a g Type: RMS | | TF | AM Aug 09, 202 RACE 1 2 3 4 5 TYPE WMMMM DET P P P P P | 6 | Span Spar |
|--------------|-----------|----------|------------|--------------------------------------|-----------|-------|---------------|-----|---|----------|------------------------|--------|---------|---|-----|------------------|
| | B/di | v | Ref Ref | Offset 1 5 30.00 | dB dBm | | | | | | | ΔN | /kr3 | 2.500 ms -0.10 dE | | 0.00000000 H |
| 20.0 | | | | | | | | | | | | | | | | |
| 10.0 | | | | | | | | _0 | 1 | | | | | 3∆1 | | |
| 0.00 | ⊨ | | - | | - | - | - | - | | | | - | _ | TRIG LVI | | |
| 10.0 | ⊢ | | - | | - | | - | - | | | | | | | | |
| -20.0 | ⊢ | | - | | | | - | - | | | | | _ | | 1 | Full Spa |
| -30.0 | ⊢ | | - | | - | | Laudi d | - | | | | | 201 | | | |
| -40.0 | | | - | | - | | 100 | | | | | | lipinje | 1 | | |
| -50.0 | | | - | | - | | | - | | | | | | | 1 | Zero Spa |
| -60.0 | | | - | | - | | | - | | | | | | | ∎⊢ | |
| | ter BV | | | 00000 z | GHz | | #VE | зw | 8.0 MHz | | Swee | ep 5.0 | | Span 0 Hz 6 (8000 pts | | LastSpa |
| NKE 1 | MODE N | TRC 1 | sci t | | × | 2.000 | | | 7.90 dBm | FUNCTION | FUNCTION | MDTH | FUNC | TION VALUE | | |
| 2 | Δ1 Δ1 | | t | (Δ) (Δ) | | 2.150 | | | -44.88 dB -0.10 dB | | | | | | | |
| 4 | | | ` | (11) | | 2.000 | | ., | 0.10 02 | | | | | | | |
| 67 | | | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | | | Signal Trac |
| 8 9 10 | | | | | | | | | | | | | | _ | On | (Span Zoom Ol |
| 11 | | | | | | | | | | | | | | | I 0 | 0 |
| 15G | | | | | | | | | | | | STATUS | | | | |

| Test Mode | On Time (msec) | Period (msec) | Duty Cycle x (Linear) | Duty Cycle (%) | Duty Cycle Correction Factor (dB) | 1/T Minimum VBW (kHz) | Final setting For VBW (kHz) |
|-----------|-------------------|------------------|-----------------------------|-------------------|--|--------------------------------|-----------------------------------|
| Thread | 100 | 100 | 1 | 100 | 0 | 0.01 | 0.01 |

| | | | | | um Analyzer - Swept SA | |
|------------------------------------|--|-----------|------------|------------|----------------------------------|-----------|
| Frequency | 02:33:40 PM Aug 09, 2021 TRACE 1 2 3 4 5 6 TYPE WWWWWWW DET P N N N N N | ALIGNAUTO | SENS | GHz | RF 50 R AC req 2.445000000 | Center F |
| Auto Tune | Mkr1 22.00 ms 7.66 dBm | | #Atten: 30 | IFGain:Low | Ref Offset 1 dB Ref 21.00 dBm | 10 dB/div |
| Center Freq 2.445000000 GHz | | | | | • ¹ | 11.0 |
| Start Freq 2.445000000 GHz | | | | | | 9.00 |
| Stop Free 2.445000000 GHz | | | | | | -19.0 |
| CF Step 8.000000 MH Auto Mar | | | | | | -49.0 |
| Freq Offse | | | | | | 59.0 |
| | Span 0 Hz | | | | 145000000 GHz | |
| | 00.0 ms (1001 pts) | Sweep 1 | 8.0 MHz | #VBW | WHZ | Res BW |

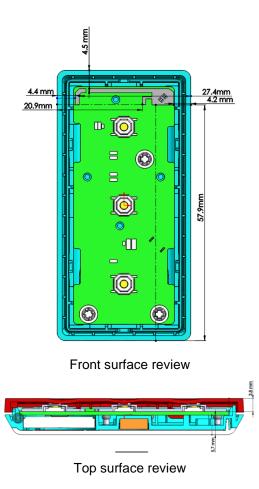
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8. SAR Test Configuration

The EUT is a remote control, the EUT will be held in the hand when used, so 10-g Extremities SAR(0mm) evaluation is considered.



Per FCC KDB 447498D01:

1. The 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances \leq 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $\left[\sqrt{f(GHz)}\right] \le 3.0$ for 1-g SAR and ≤ 7.5 for product specific 10-g SAR, where:

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

2. The SAR exclusion threshold for distances >50mm is defined by the following equation, as illustrated in KDB 447498 D01 Appendix B:

a) at 100 MHz to 1500 MHz

[Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) \cdot (f(MHz)/150)] mW b) at > 1500 MHz and ≤ 6 GHz

[Power allowed at numeric Threshold at 50 mm in step 1) + (test separation distance - 50 mm) 10] mW

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3. The test separation distances required for a device to demonstrate SAR or MPE compliance must be sufficiently conservative to support the operational separation distances required by the device and its antennas and radiating structures. For devices such as tablets and transmitters embedded in keyboard sections of laptop computers that are typically used in close proximity to users, the test separation distance is determined by the smallest distance between the outer surface of the device and the user. For larger devices, as the antenna operational separation distance increases to where the SAR characteristics of the device and its antennas are not directly influenced by the user, such as antennas along the top and upper side edges of laptop computer displays or opposite and adjacent edges of tablets, the test separation distance is normally determined by the closest separation between the antenna and the user.

Note:

1) The same procedure is applied to extremity SAR evaluation, and the corresponding limitation is 2.5 times of 1-g SAR.

| Position | Frequency | Power (dBm) | Power (mW) | Separation Distance (mm) | Calculated Result | Threshold | SAR Test |
|---------------|-----------|----------------|---------------|-----------------------------|-------------------|-----------|----------|
| Top edge | 2480 | 8 | 6.31 | 5 | 1.987 | 7.5 | Excluded |
| Bottom edge | 2480 | 8 | 6.31 | \ | \ | ١ | ١ |
| Left edge | 2480 | 8 | 6.31 | 5 | \ | ١ | ١ |
| Right edge | 2480 | 8 | 6.31 | 5 | 1.987 | 7.5 | Excluded |
| Front surface | 2480 | 8 | 6.31 | 5 | 1.987 | 7.5 | Excluded |
| Rear surface | 2480 | 8 | 6.31 | 5.7 | 1.743 | 7.5 | Excluded |

For Thread/BLE 10-g SAR (antenna to edges separation distance less than 50mm)

| Position | Frequency | Power (dBm) | Power (mW) | Power allowed at 50mm | Separation Distance (mm) | Calculated Result(mW) | SAR Test |
|---------------|-----------|----------------|---------------|-----------------------|--------------------------------|--------------------------|-------------|
| Top edge | 2480 | 8 | 6.31 | ١ | ١ | ١ | ١ |
| Bottom edge | 2480 | 8 | 6.31 | 238.13 | 57.9 | 317.13 | Excluded |
| Left edge | 2480 | 8 | 6.31 | \ | / | ١ | ١ |
| Right edge | 2480 | 8 | 6.31 | \ | / | ١ | ١ |
| Front surface | 2480 | 8 | 6.31 | \ | / | ١ | ١ |
| Rear surface | 2480 | 8 | 6.31 | \ | \ | ١ | ١ |

Although all the surfaces have been exempted for SAR measured, however we still test all surface to evaluate the impact of RF radiation as customer's request.

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9. Dielectric Property Measurements & System Check

9.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18° C to 25° C and within $\pm 2^{\circ}$ C of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 - 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

Tissue Dielectric Parameters

FCC KDB 865664 D01 v01r04 SAR Measurement 100 MHz to 6 GHz

| Target Frequency (MHz) | H | lead | Bo | dy |
|------------------------|----------------|---------|----------------|---------|
| raiger requency (Minz) | ۶ _r | σ (S/m) | ۶ _r | σ (S/m) |
| 150 | 52.3 | 0.76 | 61.9 | 0.80 |
| 300 | 45.3 | 0.87 | 58.2 | 0.92 |
| 450 | 43.5 | 0.87 | 56.7 | 0.94 |
| 835 | 41.5 | 0.90 | 55.2 | 0.97 |
| 900 | 41.5 | 0.97 | 55.0 | 1.05 |
| 915 | 41.5 | 0.98 | 55.0 | 1.06 |
| 1450 | 40.5 | 1.20 | 54.0 | 1.30 |
| 1610 | 40.3 | 1.29 | 53.8 | 1.40 |
| 1800 – 2000 | 40.0 | 1.40 | 53.3 | 1.52 |
| 2450 | 39.2 | 1.80 | 52.7 | 1.95 |
| 3000 | 38.5 | 2.40 | 52.0 | 2.73 |
| 5000 | 36.2 | 4.45 | 49.3 | 5.07 |
| 5100 | 36.1 | 4.55 | 49.1 | 5.18 |
| 5200 | 36.0 | 4.66 | 49.0 | 5.30 |
| 5300 | 35.9 | 4.76 | 48.9 | 5.42 |
| 5400 | 35.8 | 4.86 | 48.7 | 5.53 |
| 5500 | 35.6 | 4.96 | 48.6 | 5.65 |
| 5600 | 35.5 | 5.07 | 48.5 | 5.77 |
| 5700 | 35.4 | 5.17 | 48.3 | 5.88 |
| 5800 | 35.3 | 5.27 | 48.2 | 6.00 |

IEEE Std 1528-2013 Refer to Table 3 within the IEEE Std 1528-2013

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Dielectric Property Measurements Results:

| | | | Liquid Pa | arameter | s | Deviati | Deviation(%) | | Temp. | | |
|-----------|-------|----------|-----------|----------|------|--------------|--------------|--------------|-------|-----------|--|
| Liquid | Freq. | Measured | | Target | | Deviation(%) | | Limit (%) | (°C) | Test Date | |
| | | €r | σ | €r | σ | €r | σ | (70) | (C) | | |
| | 2360 | 40.9 | 1.76 | 39.36 | 1.72 | 3.91 | 2.33 | | | 2021.8.23 | |
| Head 2450 | 2450 | 40.8 | 1.83 | 39.2 | 1.80 | 4.08 | 1.67 | ±5 | 23.2 | | |
| | 2540 | 40.7 | 1.88 | 39.09 | 1.90 | 4.12 | -1.05 | | | | |

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9.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10mm (above 1GHZ) and 15mm (below 1GHz) from dipole center to the simulating liquid surface.
- For area scan, standard grid spacing for head measurements is 15 mm in x- and y- dimension(≤2GHz), 12 mm in x- and y-dimension(2-4 GHz) and 10mm in x- and y- dimension(4-6GHz).
- For zoom scan, Δx_{zoom} , $\Delta y_{zoom} \le 2$ GHz ≤ 8 mm, 2-4GHz ≤ 5 mm and 4-6 GHz- ≤ 4 mm; $\Delta z_{zoom} \le 3$ GHz ≤ 5 mm, 3-4 GHz- ≤ 4 mm and 4-6GHz- ≤ 2 mm.
- Distance between probe sensors and phantom surface was set to 3 mm except for 5 GHz band. For 5GHz band, Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was set to 100 mW or 250 mW depend on the certificate of the dipoles.
- The results are normalized to 1 W input power.

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System Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within 10% of the manufacturer calibrated dipole SAR target.

| | | | ed Results | Target | Delta | Limit | Temp. | | |
|-----------|------|------------------------|------------|--------------|-------|-------|-------|-----------|--|
| T.S. Liqu | bid | Zoom Scan (W/Kg) | | (Ref. value) | (%) | (%) | (℃) | Test Date | |
| Head 2450 | 1-g | 5.420 | 54.20 | 53.70 | 0.93 | ±10 | 23.2 | 2021.8.23 | |
| Head 2450 | 10-g | 2.630 26.30 | | 25.00 | 5.20 | ±10 | 23.2 | 2021.0.23 | |

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10. Measured and Reported (Scaled) SAR Results

As per KDB 447498 sec.4.1.e), When SAR or MPE is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported.

Scaled SAR calculation formula:

Scaled SAR = Tune-up in mW / Conducted power in mW * Duty cycle (if available) * SAR value

SAR Test Reduction criteria are as follows:

KDB 447498 D01 General RF Exposure Guidance:

A) Per KDB447498 D01 v06, all SAR measurement results are scaled to the maximum tune-up tolerance limit to demonstrate SAR compliance.

B) 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:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz.
- ≤ 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.
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz.

Per KDB865664 D01 v01r04:

For each frequency band, repeated SAR measurement is required only when the measured SAR is \geq 0.8W/Kg; if the deviation among the repeated measurement is \leq 20%, and the measured SAR <1.45W/Kg, only one repeated measurement is required.

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10.1. SAR Test Results of Thread

| | | | Power | (dBm) | SAR Value | | Duty | | |
|-------------------------------|-----------|-----------------------|---------|-------|----------------|----------------|---------------|------------------|--|
| Scenario and Distance(0mm) | Test Mode | Channel/ Frequency | Tune-up | Meas. | 10-g (W/kg) | Power Drift | Factor (%) | Scaled (W/Kg) | |
| Top Side | Thread | 26/2480 | 8.00 | 7.71 | 0.003 | -0.13 | 100.00 | 0.003 | |
| Front Side | Thread | 26/2480 | 8.00 | 7.71 | 0.009 | 0.00 | 100.00 | 0.009 | |
| Back side | Thread | 26/2480 | 8.00 | 7.71 | 0.008 | -0.02 | 100.00 | 0.008 | |
| left side | Thread | 26/2480 | 8.00 | 7.71 | 0.004 | -0.10 | 100.00 | 0.004 | |
| Right side | Thread | 26/2480 | 8.00 | 7.71 | 0.002 | -0.11 | 100.00 | 0.003 | |
| Bottom Side | Thread | 26/2480 | 8.00 | 7.71 | <0.001 | -1.50 | 100.00 | <0.001 | |
| Front Side | Thread | 11/2405 | 8.00 | 7.35 | 0.008 | 0.12 | 100.00 | 0.010 | |
| Front Side | Thread | 19/2445 | 8.00 | 7.67 | 0.013 | -0.14 | 100.00 | 0.014 | |

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10.2. SAR Test Results of BLE

| | | | Power | (dBm) | SAR Value | | | |
|-------------------------------|-----------|-----------------------|---------|-------|----------------|----------------|-----------------------|------------------|
| Scenario and Distance(0mm) | Test Mode | Channel/ Frequency | Tune-up | Meas. | 10-g (W/kg) | Power Drift | Duty Factor (%) | Scaled (W/Kg) |
| Top Side | 1M | 19/2440 | 8.00 | 7.32 | 0.001 | 0.13 | 86.00 | 0.002 |
| Front Side | 1M | 19/2440 | 8.00 | 7.32 | 0.009 | -0.06 | 86.00 | 0.012 |
| Back side | 1M | 19/2440 | 8.00 | 7.32 | 0.005 | -0.10 | 86.00 | 0.007 |
| left side | 1M | 19/2440 | 8.00 | 7.32 | 0.001 | -0.12 | 86.00 | 0.002 |
| Right side | 1M | 19/2440 | 8.00 | 7.32 | 0.001 | -0.09 | 86.00 | 0.001 |
| Bottom Side | 1M | 19/2440 | 8.00 | 7.32 | <0.001 | -0.11 | 86.00 | <0.001 |
| Front Side | 1M | 0/2402 | 8.00 | 7.12 | 0.006 | 0.10 | 86.00 | 0.009 |
| Front Side | 1M | 39/2480 | 8.00 | 7.21 | 0.010 | -0.15 | 86.00 | 0.014 |

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11. Simultaneous Transmission SAR Analysis

Per FCC KDB 447498D01, SAR compliance for simultaneous transmission must be considered when the maximum duration of overlapping transmissions, including network hand-offs, is greater than 30 seconds. This device could not contain multiple transmitters that may operate simultaneously, and therefore no requires a simultaneous transmission analysis.

Appendixes

Refer to separated files for the following appendixes.

4790053747-SAR-2_App A Photo

4790053747-SAR-2_App B System Check Plots

4790053747-SAR-2_App C Highest Test Plots

- 4790053747-SAR-2_App D Cal. Certificates
- 4790053747-SAR-2_App E Dipole calibration record

-----End of Report-----

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