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Report No.: 1911RSU052-U6 Report Version: V01 Issue Date: 12-26-2019

SAR MEASUREMENT REPORT

FCC ID: O57VR3030S

Applicant: Lenovo (Shanghai) Electronics Technology Co., Ltd.

Application Type: Certification

Product: Standalone VR Headset

Model No.: Lenovo VR-3030S

FCC Classification: Digital Transmission System (DTS)

Unlicensed National Information Infrastructure (UNII)

FCC Rule Part(s): FCC 47 CFR Part 2.1093

Test Procedure(s): IEEE 1528:2013; IEEE C95.1- 2005;

KDB 447498 D01v06; KDB 865664 D01v01r04;

KDB 248227 D01v02r02

Test Date: December 14 ~ 16, 2019

Reviewed By:

Approved By:

(Robin Wu)



The test results relate only to the samples tested.

This equipment has been shown to be capable of compliance with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures specified in IEEE1528, KDB 447498 and KDB 865664. Test results reported herein relate only to the item(s) tested. The test report shall not be reproduced except in full without the written approval of MRT Technology (Suzhou)

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Revision History

Report No.	Version	Description	Issue Date	Note
1911RSU052-U6	Rev. 01	Initial Report	12-26-2019	Valid

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General Information

Applicant:	Lenovo (Shanghai) Electronics Technology Co., Ltd.	
Applicant Address	Section 304-305, Building No. 4, # 222, Meiyue Road, China	
Applicant Address:	(Shanghai) Pilot Free Trade Zone	
Manufacturer:	Lenovo PC HK Limited	
Manufacturer Address:	23/F, Lincoln House, Taikoo Place 979 King's Road, Quarry Bay, Hong	
Manufacturer Address.	Kong, P.R.China	
Test Site:	MRT Technology (Suzhou) Co., Ltd	
Test Site Address:	D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development	
	Zone, Suzhou, China	
Test Device Serial No.:	N/A ☐ Production ☐ Pre-Production ☐ Engineering	

Test Facility / Accreditations

Measurements were performed at MRT Laboratory located in Tian'edang Rd., Suzhou, China.

- MRT facility is a FCC accredited (MRT Designation No. CN1166) test facility with the site description report on file and has met all the requirements specified in ANSI C63.4-2014.
- MRT facility is an IC registered (MRT Reg. No. 11384A-1) test laboratory with the site description on file at Industry Canada.
- MRT facility is a VCCI registered (R-20025, G-20034, C-20020, T-20020) test laboratory with the site description on file at VCCI Council.
- MRT Lab is accredited to ISO 17025 by the American Association for Laboratory Accreditation (A2LA) under the American Association for Laboratory Accreditation Program (A2LA Cert. No. 3628.01) in EMC, Telecommunications, Radio and SAR testing.



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1. Introduction

1.1. Scope

Measurement and determination of specific absorption rate (SAR) of radio frequency devices including intentional and/or unintentional radiators is compliance with the technical rules and regulations of the Federal Communications Commission.

1.2. MRT Test Location

The map below shows the location of the MRT LABORATORY, its proximity to the Taihu Lake. These measurement tests were conducted at the MRT Technology (Suzhou) Co., Ltd. Facility located at D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China. The measurement facility compliant with the test site requirements specified in ANSI C63.4-2014.



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2. Product Information

2.1. General Description for EUT

Product Name	Standalone VR Headset
Model No.	Lenovo VR-3030S
EUT Type	Portable Device
Exposure Category	General Population/Uncontrolled Exposure

2.2. Product Specification Subjective to this Report

WLAN Specification	
Frequency Range	For 2.4GHz WLAN
	802.11b/g/n-HT20: 2412 ~ 2462 MHz
	For 5GHz WLAN
	802.11a /n-HT20/ac-VHT20:
	5180~5240 MHz, 5260~5320 MHz, 5500~5720 MHz, 5745~5825 MHz
	802.11n-HT40/ac-VHT40:
	5190~5230 MHz, 5270~5310 MHz, 5510~5710 MHz, 5755~5795 MHz
	802.11ac-VHT80/ac-VHT80:
	5210 MHz, 5290 MHz, 5530 MHz, 5610 MHz, 5690 MHz, 5775 MHz
Channel Number	For 2.4GHz WLAN
	802.11b/g/n-HT20: 11
	For 5GHz WLAN
	802.11a/n-HT20/ac-VHT20: 25
	802.11n-HT40/ac-VHT40: 12
	802.11ac-VHT80/ac-VHT80: 6
Type of Modulation	802.11b: DSSS
	802.11a/g/n/ac: OFDM
Data Rate	802.11b: 1/2/5.5/11Mbps
	802.11a/g: 6/9/12/18/24/36/48/54Mbps
	802.11n: up to 300Mbps
	802.11ac: up to 866.6Mbps

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Bluetooth Specification		
Frequency Range 2400MHz~ 2483.5MHz		
Channel Number	For Bluetooth: 79	
	For BT-LE: 40	
Channel Spacing	For Bluetooth: 1MHz	
	For BT-LE: 2MHz	
Type of Modulation	1Mbps (GFSK), 2Mbps (Pi/4 DQPSK), 3Mbps (8DPSK)	

2.3. Description of Available Antennas

Operating Condition	2.4GHz WLAN: 802.11b/g/n for antenna 1+2 (2Tx, 2Rx)	
	5GHz WLAN: 802.11a/n/ac for antenna 1+2 (2Tx, 2Rx)	
	Bluetooth BR/EDR/LE for antenna 1 (1Tx, 1Rx)	
Antenna Type	FPC Antenna	
Antenna Gain	Antenna 1	2400 ~ 2483.5MHz: 2.40dBi
		5150 ~ 5850MHz: 4.10dBi
	Antenna 2	2400 ~ 2483.5MHz: 2.25dBi
	5150 ~ 5850MHz: 4.28dBi	
Simultaneously	WLAN (Antenna 1 + 2) transmit simultaneously;	
Transmitting Scenarios	Bluetooth Antenna 1 transmit simultaneously with WLAN Antenna 2	

2.4. Ancillary Equipment

Ancillary Equipment	Charger
Model No.	UC13US
Input	100-240V ~ 50/60Hz, 0.35A
Output	5V-2A

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3. Summary of Test Result

3.1. Test Standards

No.	Identity	Document Title
1	47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices
2	IEEE 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
3	IEEE C95.1-2005	IEEE Standard for Safety Levels with Respect to Human Exposure to
		Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
4	KDB 447498 D01 v06	General RF Exposure Guidance
5	KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
6	KDB 865664 D02 v01r02	RF Exposure Reporting
7	KDB 248227 D01 v02r02	SAR Guidance for IEEE 802.11 (WLAN) Transmitter

3.2. Environment Condition

Ambient Temperature	20.5°C~24.0°C
Temperature of Simulant	20.0°C~23.5°C
Relative Humidity	38%RH ~55%RH

3.3. RF Exposure Limits

Human Exposure	Basic restrictions for electric, magnetic and electromagnetic fields. (Unit in mW/g or W/kg)
Spatial Peak SAR1(Head and Body)	1.60
Spatial Average SAR2(Whole Body)	0.08
Spatial Peak SAR ³ (Arms and Legs)	4.00

Notes:

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

3.4. Test Result Summary

Worst SAR List

Configuration	Highest Stand alone Reported 1g-SAR (W/kg)	Highest Simultaneously 1g-SAR (W/kg)
5GHz WLAN MIMO	N/A	0.22

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4. Specific Absorption Rate (SAR)

4.1. 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.

4.2. Definition

The SAR in the tissue-equivalent liquid can be determined by the rate of temperature increase or by E-field measurements, according to Formulas (1) or (2):

$$SAR = \frac{\sigma E^2}{\rho} \tag{1}$$

$$SAR = c_{h} \frac{dT}{dt} \bigg|_{t=0}$$
 (2)

where

SAR is the specific absorption rate in W/kg;

E is the rms value of the electric field strength in the tissue medium in V/m;

σ is the electrical conductivity of the tissue medium in S/m;

ρ is the mass density of the tissue medium in kg/m³;

ch is the specific heat capacity of the tissue medium in J/(kg K);

 $\frac{dT}{dt}\Big|_{t=0}$ is the initial time derivative of temperature in the tissue medium in K/s.

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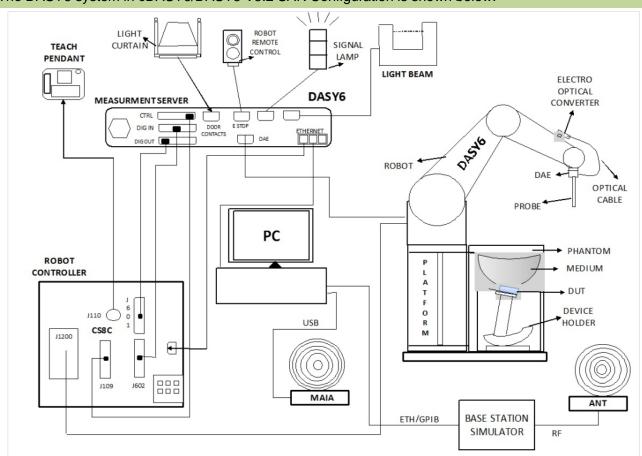
5. DASY6 Measurement System

5.1. Introduction

DASY6 is the latest generation of the Dosimetric Assessment System optimized for specific absorption rate (SAR) measurements, SAR compliance. DASY6 builds on the power of our industry - leading dosimetric and near-field evaluation system, DASY52. Running on a significantly more robust platform and a more powerful measurement server, DASY6 offers much faster scanning with no sacrifice of measurement precision. All hardware and software are fully compatible with DASY52. The new system seamlessly integrates two software solutions, the novel cDASY V6.6 - optimized for SAR compliance testing to significantly reduce SAR assessment costs - and the widely used DASY V5.2 for generalized near-field evaluations with maximized flexibility.

5.2. DASY6 Measurement System Diagram

The DASY6 system in cDASY6/DASY5 V5.2 SAR Configuration is shown below:



The System consist of the following components:

DASY6 Measurement Server, Data Acquisition Electronics (DAE), Probes, Light-Beam Unit, Phantoms, Media, Device Holder for SAM-Twin Phantom, Laptop Extension Kit to Mounting Device, Robot System Platform & Pedestal, Verification of the Parameters with the Dielectric Assessment Kit (DAK), Modulation and Interference Analyzer (MAIA), Omni-Directional Ultra-Wideband Antenna (ANT), cDASY6 software, DASY5 NEO software and SEMCAD data evaluation software.

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5.3. System Components Details

DASY6 Platforms MP6E-TX60L

MP6E-TX60L platform is a compact cost-effective platform based on TX60L. It consists of:

- a stable non-metalic platform for the TX60L robot
- a frame for two standard-size phantoms (1.0 x 0.5 m)
- a frame for one half-size phantom (0.5 × 0.5 m)

It includes two easily moveable trolleys for the phone and tablet/computer positioner and two platforms for positioning dipoles and other antennas.



Material The beams consist of a composite of wood and epoxy (permittivity of 3.3 and loss tangent

of < 0.07)

Size The footprint of the platform is 1590 mm \times 1060 mm.

Robots -TX60L

The MRT DASY6 system uses the high-precision industrial robots TX60L from Staubli SA (France). The TX robot family - the successor of the well-known RX robot family - continues to offer the features important for DASY6 applications:

- High precision (repeatability 0.02mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance-free as all gears are direct drive, no belt drives)
- Jerk-free straight movements (brushless synchron motors, no stepper motors)
- Low extremely low frequency (ELF) interference (motor control fields are shielded by the closed metallic construction)

The robots are controlled by the Staubli CS8c robot controllers. All information regarding the use and maintenance of the robot arm and the robot controller is provided on CDs delivered with the robot. Paper manuals are available directly from Staubli upon request.





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DASY6 Measurement Server

The DASY6 measurement server is based on a PC/104 CPU board with a 400MHz intel ULV Celeron, 128MB chip-disk and 128MB RAM. The necessary circuits for communication with the DAE4 electronics box, as well as the 16-bit AD converter system for optical detection and digital I/O interface are contained on the DASY6 I/O board, which is directly connected to the PC/104 bus of the CPU board. The measurement server performs all real-time data evaluations of field measurements and surface detection, controls robot movements, and handles safety operations.



Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE4) consist 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 with a 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.



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Probes

E-Field Probe(EX3DV4)

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. SPEAG conducts the probe calibration in compliance with international and national standards (e.g. IEEE 1528, EN 62209-1, IEC 62209, etc.) under ISO 17025.

Construction:

Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

Frequency: 4 MHz ~ 10 GHz Linearity: ±0.2 dB (30 MHz ~ 10 GHz)

Directivity:

±0.1 dB in TSL (rotation around probe axis)

±0.3 dB in TSL (rotation normal to probe axis)

Dynamic Range: 10 μ W/g to 100 mW/g; Linearity: \pm 0.2 dB (noise: typically < 1 μ W/g)

Dimensions:

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

Applications:

High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better than 30%.



MSTV1 (Mother Scan Teaching V1) Electronics & TP6V2 (Teaching Probe 6V2) Probe

MSTV1 (Mother Scan Teaching V1) electronics together with the TP6V2 (Teaching Probe 6V2) probe is used for mother scan of DASY6 system. This probe uses a 3D Renishaw LP2 sensor which ensures accurate detection of any shape and a measurement repeatability of 8 μ m.



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Light-Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm, as well as the probe length and the horizontal probe offset, are measured. The software then corrects all movements within the measurement jobs, such that the robot coordinates are valid for the probe tip.



The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.

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Phantoms

SAM-Twin Phantom

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body-mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

SAM-Twin V5.0 and higher has the same shell geometry and is manufactured from the same material as SAM-Twin V4.0, but with the top structure reinforced.

Material Vinyl ester, fiberglass reinforced (VE-GF)

Liquid Compatibility The phantom shell is compatible with

SPEAG tissue simulating liquids (sugar and oil based). Use of other liquids may render the phantom warranty void (see note or

consult SPEAG support).

Shell Thickness $2 \pm 0.2 \text{ mm}$ (6 ± 0.2 mm at ear point)

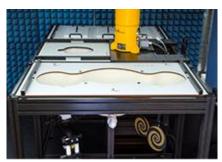
Dimensions Length: 1000 mm (incl. Wooden Width: 500 mm

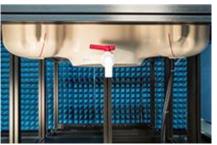
Support) Height: adjustable feet

Filling Volume approx. 25 liters

Support DASY6: standard-size platform slot

DASY52 stand-alone: SPEAG standard phantom table





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ELI phantom

The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.

ELI V5.0 and higher has the same shell geometry and is manufactured from the same material as ELI V4.0, but has reinforced top structure. ELI V6.0, released in August 2014, has the same shell geometry as ELI V4.0 but offers increased longterm stability.

Material Vinyl ester, fiberglass reinforced (VE-GF)

Liquid Compatibility The phantom shell is compatible with

SPEAG tissue simulating liquids (sugar and oil based). Use of other liquids may render the phantom warranty void (see note or

consult SPEAG support).

Shell Thickness $2.0 \pm 0.2 \text{ mm}$ (bottom plate)

Dimensions Major axis: 600 mm

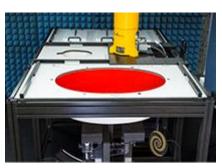
Minor axis: 400 mm

Filling Volume approx. 30 liters

Support DASY6: standard-size platform slot

DASY52 stand-alone: SPEAG standard

phantom table





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SAM Face Down Phantom

The SAM Face Down Phantom V10 allows assessment of the exposure of the face and in particular the eyes for handheld devices operated in front of the face. e.g., video phones, cameras, organizers, etc. It is manufactured from high precision injection molded polypropylene. The Mounting Device for Transmitters including extensions kit can be used to position the device.

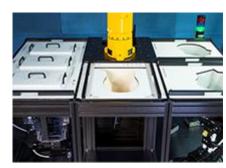
Material Epoxy based

Liquid Compatibility The phantom shell is compatible with

SPEAG tissue simulating liquids (sugar and oil based). Use of other liquids may render the phantom warranty void (see

note or consult SPEAG support).

Shell Thickness 2 ± 0.2 mm (6 mm at ear point) Head Shape Standard compatible SAM head.





SAM Head Stand Phantom

The SAM Head Stand Phantom V10 allows assessment of the exposure of the top-head or around-the-head wireless accessories, e.g., head-belts, etc. It is manufactured from high precision injection molded polypropylene. The Mounting Device for Transmitters including extensions kit can be used to position the device.

Material Epoxy based

Liquid Compatibility The phantom shell is compatible with

SPEAG tissue simulating liquids (sugar and oil based). Use of other liquids may render the phantom warranty void (see

note or consult SPEAG support).

Shell Thickness 2 ± 0.2 mm (6 mm at ear point) Head Shape Standard compatible SAM head.





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Wrist Phantom

The Wrist Phantom V10 is shape-compatible with the CTIA approved OTA GFPC-V1 and optimized for SAR evaluation of watches and other wireless hand accessories.

Material Epoxy based

Liquid Compatibility The phantom shell is compatible

with SPEAG tissue simulating liquids (sugar and oil based). Use of other liquids may render the phantom warranty void (see note or consult SPEAG support).

Shell Thickness Shell Thickness

Wrist Shape Design compatible with CTIA

forearm.





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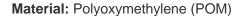


Device Holder for SAM-Twin Phantom

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5mm distance, a positioning uncertainty of ±0.5mm would produce uncertainty in the SAR of ±20%. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions at which the devices must be measured are defined by the standards.

MD4HHTV5 - Mounting Device for Hand-Held Transmitters

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).





MDA4WTV5 - Mounting Device Adaptor for Ultra Wide Transmitters

An 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.

Material: Polyoxymethylene (POM)



MDA4SPV6 - Mounting Device Adaptor for Smart Phones

The solid low-density MDA4SPV6 adaptor assuring no impact on the DUT radiation performance and is conform with any DUT design and shape.

Material: ROHACELL



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MD4LAPV5 - Mounting Device for Laptops and other Body-Worn Transmitters

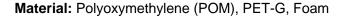
In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device (Body-Worn) enables testing of transmitter devices according to IEC 62209-2 specifications. The device holder can be locked for positioning at a flat phantom section.

Material: Polyoxymethylene (POM), PET-G, Foam



MDA4LAP - Mounting Device Adaptor for Laptops

A simple but effective and easy-to-use extension for the Mounting Device; facilitates testing of larger devices (e.g., laptops, cameras, etc.) according to IEC 62209-2; lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner. The extension is fully compatible with the Twin SAM as well as ELI and other Flat Phantoms.





Modulation and Interference Analyzer(MAIA)

MAIA is a hardware interface used to evaluate the modulation and audio interference characteristics of RF signals in the frequency range 698 - 6000 MHz. DASY6 evaluates the time-domain and frequency domain properties of the uplink signal transmitted by the DUT during SAR measurement with MAIA. MAIA uses USB powered active electronics to identify the modulation of the DUT. It can be operated over the air interface using the built-in ultra-broadband planar log spiral antenna (698 - 6000 MHz) or in conducted mode using the coaxial SMA 50 Ohm connector (300 - 6000 MHz).



To prevent damage in conducted mode due to high peak power, an external RF attenuator may be mounted. The LED on the MAIA hardware also indicates whether it is connected.

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DAK-3.5 (200MHz - 20GHz)

This precision dielectric measurement system is designed to cover the 200MHz – 20GHz frequency range with a single open-ended coaxial dielectric probe. The system uses advanced algorithms and novel hardware to measure the dielectric properties of liquids, solids, and semi-solids over a broad range of parameters. The measurement method is fast and non-destructive to the material under test.



Evaluation of reference liquids over a broad frequency range for specific absorption rate (SAR) measurements, in accordance with IEC 62209, IEEE 1528, and several federal regulations.

Evaluating Software: DAK software version 2.0

MRT simulating liquid		
Product	Test Frequency (MHz)	Main Ingredients
HSL450	400 – 500	Water, Sucrose, NaCl
MSL450	400 – 500	Water, Sucrose, NaCl

Speag Broad-Band simulating liquid	d	
Product	Test Frequency (MHz)	Main Ingredients
HBBL600-10000V6	600 – 10000	Water, Oil
MBBL600-6000V6	600 – 6000	Water, Oil

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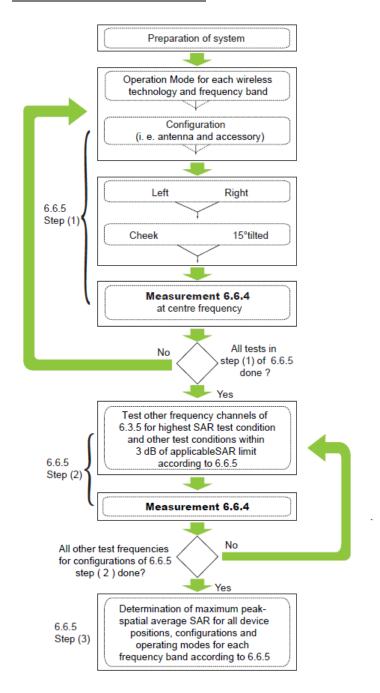


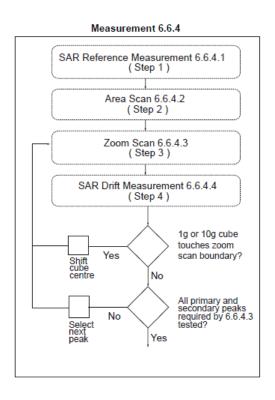
6. The SAR Measurement Procedure

6.1. Measurement Process Diagram

General Procedure

For IEEE1528-2013 Head SAR





For Body SAR

SAR scan procedures described in section 2.7 of KDB 865664 D01 v01r04 should be applied to body SAR test.

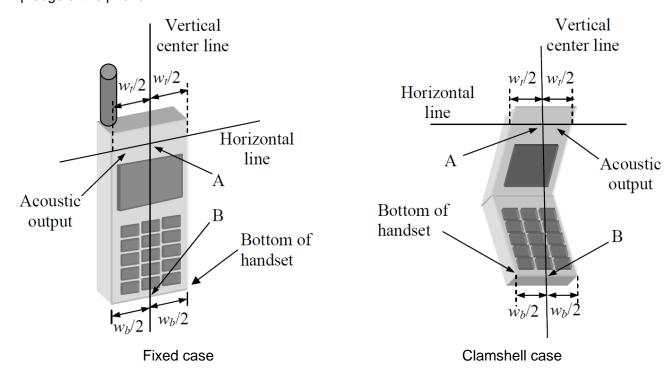
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6.2. Test Position Definition

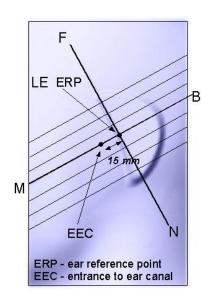
Head SAR Test Position

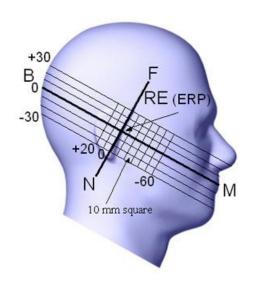
Define two imaginary lines on the handset—the vertical centerline and the horizontal line. The vertical centerline passes through two points on the front side of the handset—the midpoint of the width wt of the handset at the level of the acoustic output [point A in Fixed case and Clamshell case], and the midpoint of the width w_b at the bottom of the handset (point B). The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output [see Fixed case]. The horizontal line is also tangential to the face of the handset at point A. The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical centerline is not necessarily parallel to the front face of the handset [see Clamshell case], especially for clamshell handsets, handsets with flip covers, and other irregularly-shaped handsets, the vertical centerline passes through point A but not the tip edge of the phone.



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ney	
В	Direction of B-M line back endpoint
F	Direction of N-F line front endpoint
N	Direction of N-F line neck endpoint
М	Mouth reference point
LE	Left ear reference point (ERP)

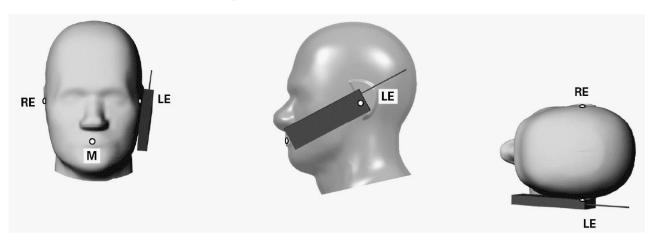
Key B Line B-M back endpoint M Line B-M front endpoint N Line N-F neck endpoint F Line N-F front endpoint RE Right ear reference point (ERP)

Cheek Position

Kov

The cheek position has the following characteristics, based on the geometrical lines described above:

- The N-F line (see above) is in the plane defined by the handset vertical centerline and horizontal line
- Handset touches the pinna
- The handset vertical centerline is aligned with the Reference Plane.



Key

M Mouth reference pointLE Left ear reference pointRE Right ear reference point

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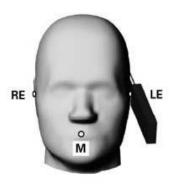
Report No.: 1911RSU052-U6



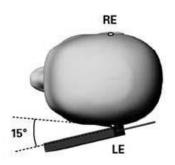
Tilt Position

The tilt position is established as follows:

- -Repeat the steps to place the device in the cheek position.
- -While maintaining the orientation of the handset, move the handset away from the pinna along the line passing through RE and LE far enough to allow a rotation of the handset away from the cheek by 15°.
- -Rotate the handset around the horizontal line by 15°.
- -While maintaining the orientation of the handset, move the handset towards the phantom on the line passing through RE and LE until any part of the handset touches the ear. The tilt position is obtained when the contact point is on the pinna. If contact occurs at any location other than the pinna, e.g., the antenna at the back of the phantom head, the angle of the handset shall be reduced. In this case, the tilt position is obtained if any point on the handset is in contact with the pinna and a second point on the handset is in contact with the phantom, e.g., the antenna with the back of the head.







Key

M Mouth reference point

LE Left ear reference point

RE Right ear reference point

■ Body SAR Test Position

For body-worn accessory, hotspot mode and other exposure conditions to human body should be conducted pursuant to the test position requirements of SAR KDBs for certain product.

6.3. Test Procedure

Step 1 Setup a Connection

First, engineer should record the conducted power before the test. Then establish a call in handset at the maximum power level with a base station simulator via air interface, or make the EUT establish transmission by itself in testing band. Place the EUT to certain test position.

Step 2 Power Reference Measurements

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To measure the local E-field value at a fixed location which value will be taken as a reference value for calculating a possible power drift.

Step 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 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.

Area Scan Parameters extracted from KDB 865664 D01v01r04

	≤ 3 GHz	> 3 GHz		
Maximum distance from closest measurement				
point (geometric center of probe sensors) to	5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \text{ mm } \pm 0.5 \text{ mm}$		
phantom surface				
Maximum probe angle from probe axis to				
phantom surface normal at the measurement	30° ± 1°	20° ± 1°		
location				
	≤ 2 GHz: ≤ 15 mm	3 - 4 GHz: ≤ 12 mm		
	2 - 3 GHz: ≤ 12 mm	4 - 6 GHz: ≤ 10 mm		
Maximum area seen english resolution:	When the x or y dimension of the test device, in the			
Maximum area scan spatial resolution:	measurement plane orientation, is smaller than the			
Δ XArea, Δ YArea	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.			

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

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Step 4 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 v01r04

			≤ 3 GHz	> 3 GHz	
Maximum zoom scan	enatial ree	olution: Av- Av-	≤ 2 GHz: ≤ 8 mm	3 - 4 GHz: ≤ 5 mm*	
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}			2 - 3 GHz: ≤ 5 mm*	4 - 6 GHz: ≤ 4 mm*	
				3 - 4 GHz: ≤ 4 mm	
	uniform (grid: ∆z _{Zoom} (n)	≤ 5 mm	4 - 5 GHz: ≤ 3 mm	
Maximum zoom				5 - 6 GHz: ≤ 2 mm	
		$\Delta z_{Zoom}(1)$: between		3 - 4 GHz: ≤ 3 mm	
scan spatial resolution, normal to		1st two points closest	≤ 4 mm	4 - 5 GHz: ≤ 2.5 mm	
phantom surface	graded	to phantom surface		5 - 6 GHz: ≤ 2 mm	
phantom surface	grid	$\Delta z_{Zoom}(n>1)$:			
		between subsequent	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1) \text{ mm}$		
		points			
Minimum zoom				3-4 GHz: ≥ 28 mm	
scan volume		x, y, z	≥ 30 mm	4-5 GHz: ≥ 25 mm	
Scari volume				5-6 GHz: ≥ 22 mm	

Note: * When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB Publication 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.

Step 5 Power Drift Measurements

Repetition of the E-field measurement at the fixed location mentioned in Step 1 to make sure the two results differ by less than \pm 0.2 dB.

Step 6 Test Data

After the test, SAR test data should be exported by SEMCAD.

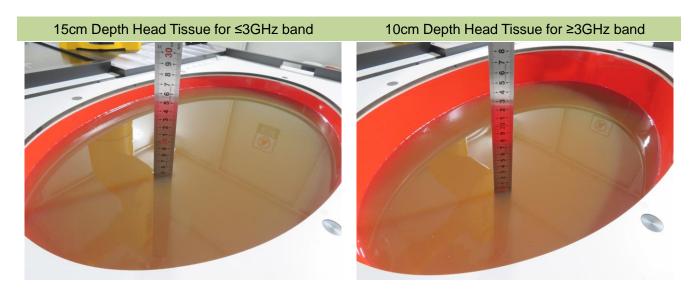
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7. System Verificaiton

7.1. Tissue Check

Refer to KDB 865664 D01 v01r04, the depth of tissue-equivalent liquid in a phantom must be \geq 15.0 cm with \leq ± 0.5 cm variation for SAR measurements \leq 3 GHz and \geq 10.0 cm with \leq ± 0.5 cm variation for measurements > 3 GHz.



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Tissue Dielectric Parameters

Frequency	Head						
(MHz)	ϵ_{r}	σ (S/m)					
300	45.3	0.87					
450	43.5	0.87					
750	41.9	0.89					
835	41.5	0.90					
900	41.5	0.97					
1 450	40.5	1.20					
1 500	40.4	1.23					
1 640	40.2	1.31					
1 750	40.1	1.37					
1 800	40.0	1.40					
1 900	40.0	1.40					
2 000	40.0	1.40					
2 100	39.8	1.49					
2 300	39.5	1.67					
2 450	39.2	1.80					
2 600	39.0	1.96					
3 000	38.5	2.40					
3 500	37.9	2.91					
4 000	37.4	3.43					
4 500	36.8	3.94					
5 000	36.2	4.45					
5 200	36.0	4.66					
5 400	35.8	4.86					
5 600	35.5	5.07					
5 800	35.3	5.27					
6 000	35.1	5.48					

(ε_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

Note:

- 1. FCC has permitted the use of single head-tissue simulating liquid specified in IEC62209-1 for all SAR tests, as described in TCB workshop April 2019.
- 2. For convenience, permittivity and conductivity values at those frequencies which are not part of the original data provided by Drossos et al. [33] or the extension to 5800MHz are provided (i.e. the values shown in italics). These values were linearly interpolated between the values in this table that are immediately above and below these values, except the values at 6000MHz that

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were linearly extrapolated from the values at 3000MHz and 5800MHz.

■ Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using DASY6 Dielectric Assessment Kit and keysight PNA-L Network Analyzer N5234B.

Tissue parameter for head											
Freq.	Dorm	Cond	Target	Target	Deviation	Deviation	Tissue	Test Date			
(MHz)	Perm. Cond	Cond.	Perm.	Cond.	Cond. Perm. % Cond. % Tempera		Temperature	resi Dale			
2450	40.39	1.86	39.20	1.80	3.04	3.33	22.5°C	2019.12.14			
5250	35.39	4.64	4 35.93 4.		-1.50	-1.49	22.5°C	2019.12.16			
5600	34.75	5.03	35.53	5.07	-2.20	-0.79	22.5°C	2019.12.16			
5750	34.47	5.21	35.36	5.22	-2.52	-0.19	22.5°C	2019.12.16			

Note: The ±5% deviation of tissue parameter is recommended.

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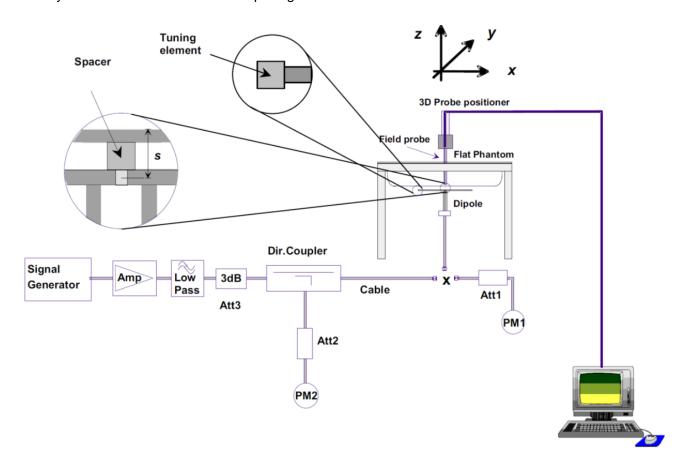


7.2. System Check

Purpose

The purpose of the system check is to verify that the system operates within its specifications at the device test frequencies. System check verifies the measurement repeatability of a SAR system before compliance testing and is not a validation of all system specifications. The latter is not required for testing a device but is mandatory before the system is deployed.

System Performance Check Setup Diagram



System Check Procedure

The system check procedure is a complete 1g and 10g peak spatial-average SAR measurement using a source having a previously determined system check target value. The measured 1g and 10g SAR are normalized to the target input power of the specific source and compared to their respective target values.

A description of the different measurement tasks to be performed is given below, together with the information that can be deduced from their results:

a. The Power Reference Measurement and Power Drift Measurement are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the amplifier output power. If it is too high (above

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±0.1 dB), the system check should be repeated; some amplifiers have very high drift during warm-up. A stable amplifier gives drift results in the DASY6 system below ±0.02 dB.

- b. The second step is optional. For probes with integrated optical surface detection sensor this step must be conducted, otherwise the step can be skipped. The Surface Check tests the optical surface detection system of the DASY6 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above ±0.1 mm). In that case it is better to abort the system check and stir the liquid.
- c. The Area Scan measures the SAR above the dipole on a plane parallel to the surface. It is used to locate the approximate location of the peak SAR. The proposed scan uses large grid spacing for faster measurement; due to the symmetric field, the peak detection is reliable. If a finer graphic is desired, the grid spacing can be reduced. Grid spacing and orientation have no influence on the SAR result.
- d. The Zoom Scan measures the field in a volume around the peak SAR value assessed in the previous Area Scan.

If the system check gives reasonable results, the SAR peak, 1 g and 10 g spatial average SAR values normalized to 1 W dipole input power give reference data for comparisons. The next sections analyze the expected uncertainties of these values, as well as additional checks for further information or troubleshooting.

■ Result of System Performance Check

System check for head											
Freq.	1g SAR	10g SAR	Target	Target	Deviation	Deviation	Tissue	Test Date			
(MHz)	(W/kg)	(W/kg)	1g SAR	10g SAR	1g SAR	10g SAR	Temp.				
			(W/kg)	(W/kg)	(%)	(%)					
2450	55.60	25.96	52.10	24.40	6.72	6.39	22.5°C	2019.12.14			
5250	86.30	24.60	81.70	23.30	5.63	5.58	22.5°C	2019.12.16			
5600	86.60	24.50	85.40	24.30	1.41	0.82	22.5°C	2019.12.16			
5750	82.20	23.30	79.10	22.50	3.92	3.56	22.5°C	2019.12.16			

Note:

- 1. The ±10% deviation of system check result is required.
- 2. System check value listed above has been harmonized to 1W.

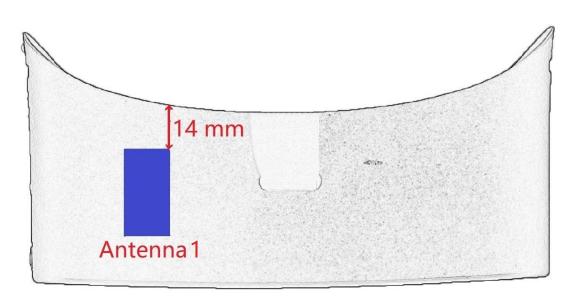
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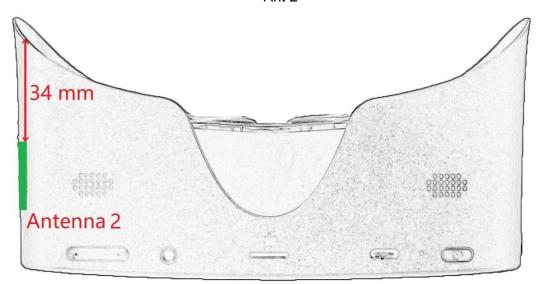
8. Analysis and Results

8.1. Antenna Location

Ant 1



Ant 2



Antenna Distance to forehead (mm)					
Ant 1	Ant 2				
14	34				

Note: The closest distance between the antenna and forehead is 14mm. During the SAR test, part of plastic frame was cut off to get the closest usage distance. See more details in Annex C.

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8.2. Conducted Power

■ DTS Band WLAN

Band (GHz)			CH Freq. (MHz)		Average Po	ower (dB	Total	Total	Duty	
	Mode			Ant 1	Ant1 Tune-up Limit	Ant 2	Ant2 Tune-up Limit	Power (dBm)	Tune-up Limit Power (dBm)	Cycle %
		1	2412	11.12	12.0	11.32	12.0	14.23	15.0	
	802.11b	6	2437	11.18	12.0	11.30	12.0	14.25	15.0	99.20
		11	2462	11.28	12.0	10.55	12.0	13.94	15.0	
2.4	802.11g	1	2412	10.58	12.0	11.24	12.0	13.93	15.0	
2.4		6	2437	11.19	12.0	11.45	12.0	14.33	15.0	95.12
(2.4~2.4835)		11	2462	10.93	12.0	10.66	12.0	13.81	15.0	
	000.44	1	2412	10.69	12.0	11.03	12.0	13.87	15.0	
	802.11n	6	2437	11.11	12.0	11.37	12.0	14.25	15.0	94.82
	(HT20)	11	2462	11.39	12.0	11.02	12.0	14.22	15.0	

■ U-NII-1 Band WLAN

					Average Po	ower (dB	m)	Total	Total	Duti
Band (GHz)	Mode	CH	(MILI-)	Ant 1	Ant1 Tune-up Limit	Ant 2	Ant2 Tune-up Limit	Power (dBm)	Tune-up Limit Power (dBm)	Duty Cycle %
		36	5180	10.67	11.0	10.03	11.0	13.37	14.0	
	а	44	5220	10.62	11.0	10.15	11.0	13.40	14.0	95.60
		48	5240	10.82	11.0	10.42	11.0	13.63	14.0	
		36	5180	10.51	11.0	9.66	10.0	13.12	13.5	
	n(HT20)	44	5220	10.58	11.0	9.86	10.0	13.25	13.5	95.06
		48	5240	10.54	11.0	9.73	10.0	13.16	13.5	
5.2	n(HT40)	38	5190	10.61	11.0	9.78	10.0	13.23	13.5	91.19
(5.15~5.25)		46	5230	10.46	11.0	9.78	10.0	13.14	13.5	
(5.15~5.25)		36	5180	10.35	11.0	9.18	10.0	12.81	13.5	
	ac (VHT20)	44	5220	10.53	11.0	9.64	10.0	13.12	13.5	95.07
	(VH120)	48	5240	10.31	11.0	9.76	10.0	13.05	13.5	
	ac	38	5190	10.54	11.0	9.29	10.0	12.97	13.5	04.00
	(VHT40)	46	5230	10.48	11.0	9.79	10.0	13.16	13.5	91.20
	ac (VHT80)	42	5210	10.24	11.0	9.63	10.0	12.96	13.5	84.12

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■ U-NII-2A Band WLAN

	Mode	CH	Freq. (MHz)	Average Power (dBm)				Total	Total	Duty
Band (GHz)				Ant 1	Ant1 Tune-up Limit	Ant 2	Ant2 Tune-up Limit	Power (dBm)	Limit Power	Duty Cycle %
5.3 (5.25~5.35)	а	52	5260	10.46	11.0	10.02	10.5	13.26	13.5	95.60
		60	5300	10.73	11.0	9.73	10.5	13.27	13.5	
		64	5320	10.56	11.0	9.76	10.5	13.19	13.5	
	n(HT20)	52	5260	10.28	11.0	10.01	10.5	13.16	13.5	95.06
		60	5300	10.14	11.0	10.22	10.5	13.19	13.5	
		64	5320	10.18	11.0	9.91	10.5	13.06	13.5	
	n(HT40)	54	5270	10.55	11.0	10.23	10.5	13.40	13.5	91.19
		62	5310	10.38	11.0	10.34	10.5	13.37	13.5	
	ac (VHT20)	52	5260	10.66	11.0	9.98	10.5	13.34	13.5	95.07
		60	5300	10.43	11.0	10.15	10.5	13.30	13.5	
		64	5320	10.52	11.0	10.14	10.5	13.34	13.5	
	ac	54	5270	10.28	11.0	10.36	10.5	13.33	13.5	91.20
	(VHT40)	62	5310	10.28	11.0	10.13	10.5	13.22	13.5	
	ac (VHT80)	58	5290	10.37	11.0	10.40	10.5	13.40	13.5	84.12

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■ U-NII-2C Band WLAN

					Average Po	ower (dB	m)	Total	Total	Duty
Band (GHz)	Mode	CH	Freq. (MHz)	Ant 1	Ant1 Tune-up Limit	Ant 2	Ant2 Tune-up Limit	Total Power (dBm)	Tune-up Limit Power (dBm)	Duty Cycle %
		100	5500	10.58	11.0	9.78	10.0	13.21	13.5	
		120	5600	10.81	11.0	9.68	10.0	13.29	13.5	95.60
	а	140	5700	10.23	11.0	9.82	10.0	13.04	13.5	93.60
		144	5720	10.36	10.5	10.42	10.5	13.40	13.5	
		100	5500	10.87	11.0	10.36	11.0	13.63	14.0	
	n	120	5600	10.68	11.0	9.36	11.0	13.08	14.0	95.06
	(HT20)	140	5700	10.44	11.0	9.84	11.0	13.16	14.0	95.00
		144	5720	10.23	11.0	10.02	11.0	13.14	14.0	
	n (HT40)	102	5510	10.47	11.0	9.38	10.0	12.97	13.5	91.19
		118	5590	10.94	11.0	9.84	10.0	13.44	13.5	
5.5		134	5670	10.71	11.0	9.75	10.0	13.27	13.5	
(5.47~5.725)		142	5710	10.45	11.0	9.83	10.0	13.16	13.5	
(3.47~3.723)		100	5500	10.31	11.0	9.88	10.0	13.11	13.5	
	ac	120	5600	10.26	11.0	8.27	10.0	12.39	13.5	95.07
	(VHT20)	140	5700	10.78	11.0	9.19	10.0	13.07	13.5	95.07
		144	5720	10.58	11.0	10.02	10.5	13.32	13.5	
		102	5510	10.73	11.0	10.06	10.5	13.42	13.5	
	ac	118	5590	10.69	11.0	10.10	10.5	13.42	13.5	04.20
	(VHT40)	134	5670	10.63	11.0	10.08	10.5	13.37	13.5	91.20
		142	5710	10.42	11.0	9.89	10.0	13.17	13.5	
	0.5	106	5530	10.45	11.0	9.23	10.0	12.89	13.5	
	ac (\/UTen\	122	5610	10.68	11.0	9.67	10.0	13.21	13.5	84.12
	(VHT80)	138	5690	10.43	11.0	9.54	10.0	13.02	13.5	

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■ U-NII-3 Band WLAN

					Average Po	wer (dB	m)	Total	Total	Duty
Band (GHz)	Mode	CH	Freq. (MHz)	Ant 1	Ant1 Tune-up Limit	Ant 2	Ant2 Tune-up Limit	Total Power (dBm)	Tune-up Limit Power (dBm)	Duty Cycle %
		149	5745	10.13	10.5	10.58	11.0	13.37	13.5	
	а	157	5785	10.14	10.5	10.43	11.0	13.30	13.5	95.60
		165	5825	10.40	10.5	10.24	11.0	13.33	13.5	
	n(HT20)	149	5745	10.25	10.5	10.57	11.0	13.42	13.5	
		157	5785	10.45	10.5	10.15	11.0	13.31	13.5	95.06
		165	5825	9.73	10.5	10.54	11.0	13.16	13.5	
5.8	n/UT40)	151	5755	10.15	10.5	10.25	11.0	13.21	13.5	91.19
(5.725~5.85)	n(HT40)	159	5795	10.04	10.5	10.23	11.0	13.15	13.5	91.19
(3.723~3.63)		149	5745	10.11	11.0	10.41	11.0	13.27	14.0	
	ac (\/UT20\	157	5785	10.42	11.0	10.63	11.0	13.54	14.0	95.07
	(VHT20)	165	5825	9.91	11.0	10.33	11.0	13.14	14.0	
	ac	151	5755	10.06	10.5	10.53	11.0	13.31	13.5	04.20
	(VHT40)	159	5795	10.03	10.5	10.56	11.0	13.31	13.5	91.20
	ac (VHT80)	155	5775	10.46	10.5	9.97	11.0	13.23	13.5	84.12

■ Bluetooth

Band (GHz)	Mode	CH.	Freq. (MHz)	Average Power (dBm)	Tune-up Limit Power (dBm)
		0	2402	1.94	2.5
	DH5	39	2441	1.58	2.5
		78	2480	1.91	2.5
		0	2402	-0.83	-0.5
	2DH5	39	2441	-2.12	-0.5
2.4		78	2480	-1.25	-0.5
(2.4~2.4835)		0	2402	-1.18	-0.5
	3DH5	39	2441	-1.82	-0.5
		78	2480	-0.96	-0.5
		0	2402	1.94	2.5
	BLE	19	2440	1.61	2.5
		39	2480	1.89	2.5

Note: The power above is conducted power tested via RF cable.

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8.3. SAR Exclusion Analysis

Per FCC KDB 447498 D01v06, the SAR exclusion threshold for distances<50mm is defined by the following equation:

$$\frac{\textit{Max Power of Channel(mW)}}{\textit{Test Separation Distance(mm)}} \times \sqrt{\textit{Frequency(GHz)}} \leq 3.0 \ ;$$

For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

- 1) {[Power allowed at numeric threshold for 50 mm in step a)] + [(test separation distance 50 mm) * (f(MHz)/150)]} mW, for 100 MHz to 1500 MHz
- 2) {[Power allowed at numeric threshold for 50 mm in step a)] + [(test separation distance 50 mm)*10]}
 mW, for > 1500 MHz and ≤ 6 GHz

Antenna Distance to	Ant 1	14
forehead (mm)	Ant 2	34

14mm Antenna 1

Band	Mode	CH.	Freq.	Ant-to-user	Thresholds	Tune-up	o Power	SAR Test
Danu	Mode	5	(MHz)	distance (mm)	(mW)	dBm	mW	(Y/N)
		1	2412	14	27.04	12.0	15.85	N
DTS	802.11b	6	2437	14	26.90	12.0	15.85	N
		11	2462	14	26.77	12.0	15.85	N
		36	5180	14	18.45	11.0	12.59	N
U-NII-1	802.11a	44	5220	14	18.38	11.0	12.59	N
		48	5240	14	18.35	11.0	12.59	N
		52	5260	14	18.31	11.0	12.59	N
U-NII-2A	802.11a	60	5300	14	18.24	11.0	12.59	N
		64	5320	14	18.21	11.0	12.59	N
		100	5500	14	17.91	11.0	12.59	N
U-NII-2C	802.11n	120	5600	14	17.75	11.0	12.59	N
U-MII-2C	(HT20)	140	5700	14	17.59	11.0	12.59	N
		144	5720	14	17.56	11.0	12.59	N
	000 11	149	5745	14	17.52	11.0	12.59	N
U-NII-3	802.11ac	157	5785	14	17.46	11.0	12.59	N
	(VHT20)	165	5825	14	17.40	11.0	12.59	N
		0	2402	14	27.10	2.5	1.78	N
Bluetooth	Bluetooth	39	2441	14	26.88	2.5	1.78	N
		78	2480	14	26.67	2.5	1.78	N

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34mm Antenna 2

Dand	Mada	CLI	Freq.	Ant-to-user	Thresholds	Tune-up	o Power	SAR Test
Band	Mode	CH.	(MHz)	distance (mm)	(mW)	dBm	mW	(Y/N)
		1	2412	34	65.68	12.0	15.85	N
DTS	802.11b	6	2437	34	65.34	12.0	15.85	N
		11	2462	34	65.01	12.0	15.85	N
		36	5180	34	44.82	11.0	12.59	N
U-NII-1	802.11a	44	5220	34	44.64	11.0	12.59	N
		48	5240	34	44.56	11.0	12.59	N
		52	5260	34	44.47	11.0	12.59	N
U-NII-2A	802.11a	60	5300	34	44.31	11.0	12.59	N
		64	5320	34	44.22	11.0	12.59	N
		100	5500	34	43.49	11.0	12.59	N
U-NII-2C	802.11n	120	5600	34	43.10	11.0	12.59	N
U-MII-2C	(HT20)	140	5700	34	42.72	11.0	12.59	N
		144	5720	34	42.65	11.0	12.59	N
	802.11ac	149	5745	34	42.56	11.0	12.59	N
U-NII-3	(VHT20)	157	5785	34	42.41	11.0	12.59	N
	(11120)	165	5825	34	42.26	11.0	12.59	N

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8.4. Required Configurations of SAR Test

Antenna Co	nfiguration	Ant 1	Ant 2
	DTS	Yes*	Yes*
	U-NII-1	Yes*	Yes*
Test Band	U-NII-2A	Yes*	Yes*
lest ballu	U-NII-2C	Yes*	Yes*
	U-NII-3	Yes*	Yes*
	Bluetooth	No	N/A

Note:

- 1. " * ", marked configuration SAR test is required, which is to get more conservative SAR values.
- 2. Antenna 2 is also tasted at 0mm to get more conservative SAR values.

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8.5. SAR Test Results

General Notes:

- 1. Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band, per KDB 248227 D01 v02r02.
- 2. Testing of other required channels within the operating mode of a frequency band is not required if the reported 1-g SAR for the highest output power channel is: a) \leq 0.8 W/kg when the transmission band is \leq 100MHz; b) \leq 0.6 W/kg when the transmission band is between 100 MHz and 200MHz; c) \leq 0.4 W/kg when the transmission band is \geq 200MHz, per KDB 447498 D01 v06.
- 3. When the same maximum output power is specified for U-NII-1 and U-NII-2A bands, begin SAR measurement in U-NII-2A band. If the highest reported SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band, per KDB 248227 D01 v02r02.

Antenna 1													
Test Band	Test Mode	CH	Freq.	Test Position	Dist.	Cond. Power (dBm)	Max.Tune -up Power (dBm)	Scaling Factor	Duty Cycle %	Duty Cycle Factor	Meas. SAR-1g (W/kg)	Reported SAR-1g (W/kg)	SAR Plot #
DTS Band WLAN	b	1	2412	Towards Eyes	0	11.12	12.0	1.22	99.20	1.01	0.03	0.04	
U-NII-1 Band WLAN	а	48	5240	Towards Eyes	0	10.82	11.0	1.04	95.60	1.05	0.04	0.04	
U-NII-2C Band WLAN	n (HT20)	100	5500	Towards Eyes	0	10.87	11.0	1.03	95.06	1.05	0.04	0.04	
U-NII-3 Band WLAN	ac (VHT20)	157	5785	Towards Eyes	0	10.42	11.0	1.14	95.07	1.05	0.07	0.08	1

Antenna 2													
Test Band	Test Mode	CH	Freq.	Test Position	Dist.	Cond. Power (dBm)	Max.Tune -up Power (dBm)	Scaling Factor	Duty Cycle %	Duty Cycle Factor	Meas. SAR-1g (W/kg)	Reported SAR-1g (W/kg)	SAR Plot #
DTS Band WLAN	b	1	2412	Towards Eyes	0	11.32	12.0	1.17	99.20	1.01	0.02	0.02	
U-NII-1 Band WLAN	а	48	5240	Towards Eyes	0	10.42	11.0	1.14	95.60	1.05	0.08	0.10	
U-NII-2C Band WLAN	n (HT20)	100	5500	Towards Eyes	0	10.36	11.0	1.16	95.06	1.05	0.05	0.06	
U-NII-3 Band WLAN	ac (VHT20)	157	5785	Towards Eyes	0	10.63	11.0	1.09	95.07	1.05	0.12	0.14	2

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8.6. Estimated SAR Calculation

Per FCC KDB 447498 D01v06 section 4.3.2 b) 1), when an antenna qualifies for the standalone SAR test exclusion of 4.3.1 and also transmits simultaneously with other antennas, the standalone SAR value was estimated according to the following formula to result in substantially conservative SAR values of ≤0.4W/kg for test separation distance ≤50mm to determine the simultaneous transmission SAR test exclusion criteria:

Estimated SAR =
$$\frac{\sqrt{f(GHz)}}{7.5} * \frac{(Max\ Power\ of\ channel\ ,\ mW\)}{Min.\ Separation\ ,\ mm}$$
, for 1-g SAR

When the test separation distance is > 50 mm, estimated 1g-SAR 0.4W/kg is used for simultaneous evaluation.

I	Test Mode	Frequency	Body Position	Ant-to-user	Tune-up	Tune-up	Estimated
		(MHz)		distance	Power	Power	SAR
				(mm)	(dBm)	(mW)	(W/kg)
	Bluetooth	2480	Towards Eyes	14	2.5	1.8	0.03

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9. Simultaneous Transmission Analysis

		Stand	Summed SAR								
Test	1	2	3	4	5	(W/kg)					
Position	WLAN	WLAN	WLAN 5G	WLAN 5G	DT Ant 1	4.0	2.4	2.5	4.5		
	2.4G Ant 1	2.4G Ant 2	Ant 1	Ant 2	BT Ant 1	1+2	3+4	2+5	4+5		
Forehead	0.04	0.02	0.08	0.14	0.03	0.06	0.22	0.05	0.17		

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

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10. Test Equipment Used

SAR - SR3					
Instrument	Manufacturer	Type No.	Asset No.	Cali. Interval	Cali. Due Date
Stäubli Robot TX60L	Stäubli	TX60L	MRTSUE06412	only once	only once
Robot Controller	Stäubli	CS8C	MRTSUE06412	only once	only once
Dipole Validation Kits	Speag	D2450V2	MRTSUE06430	3 year	2021/05/08
Dipole Validation Kits	Speag	D5GHzV2	MRTSUE06434	3 year	2022/04/15
ELI Phantom Shell	Speag	V8	MRTSUE06420	N/A	N/A
DAK	Speag	DAK-3.5	MRTSUE06435	N/A	N/A
DAE4	Speag	SD 000 D04 BN	MRTSUE06414	1 year	2020/05/22
E-Field Probe	Speag	EX3DV4	MRTSUE06438	1 year	2020/04/17
Network Analyzer	Keysight	N5234B	MRTSUE06454	1 year	2020/07/11
Directional Coupler	Agilent	778D	MRTSUE06083	1 year	2020/03/26
Directional Coupler	Agilent	87301D OPT 292	MRTSUE06082	1 year	2020/03/26
Signal Generator	Keysight	N5183B	MRTSUE06197	1 year	2020/04/15
Power Sensor	Keysight	U2021XA	MRTSUE06447	1 year	2020/06/30
Thermohygrometer	Testo	622	MRTSUE06361	1 year	2020/05/06

Software	Version	Function
DASY NEO	52.10.2.1495	SAR Test Software

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11. Measurement Uncertainty

DASY5 Uncertainty Budget, according to IEEE 1528 (0.3 - 3 GHz range)								
Error Description	Uncert.	Prob.	Div.	(ci)	(ci)	Std. Unc.	Std. Unc.	(vi)
	value	Dist.		1g	10g	(1g)	(10g)	veff
Measurement System			•	•			•	
Probe Calibration	±6.0 %	N	1	1	1	±6.0 %	±6.0 %	∞
Axial Isotropy	±4.7 %	R	.√3.	0.7	0.7	±1.9 %	±1.9 %	∞
Hemispherical Isotropy	±9.6 %	R	.√3.	0.7	0.7	±3.9 %	±3.9 %	∞
Boundary Effects	±1.0 %	R	.√3.	1	1	±0.6 %	±0.6 %	∞
Linearity	±4.7 %	R	.√3.	1	1	±2.7 %	±2.7 %	∞
System Detection Limits	±1.0 %	R	.√3.	1	1	±0.6 %	±0.6 %	∞
Modulation Response	±2.4 %	R	.√3.	1	1	±1.4 %	±1.4 %	∞
Readout Electronics	±0.3 %	N	1	1	1	±0.3 %	±0.3 %	∞
Response Time	±0.8 %	R	.√3.	1	1	±0.5 %	±0.5 %	∞
Integration Time	±2.6 %	R	.√3.	1	1	±1.5 %	±1.5 %	∞
RF Ambient Noise	±3.0 %	R	.√3.	1	1	±1.7 %	±1.7 %	∞
RF Ambient Reflections	±3.0 %	R	.√3.	1	1	±1.7 %	±1.7 %	∞
Probe Positioner	±0.02 %	R	.√3.	1	1	±0.0 %	±0.0 %	∞
Probe Positioning	±0.4 %	R	.√3.	1	1	±0.2 %	±0.2 %	∞
Max. SAR Eval.	±2.0 %	R	.√3.	1	1	±1.2 %	±1.2 %	∞
Test Sample Related		1	1		1	1		•
Device Positioning	±2.9%	N	1	1	1	±2.9 %	±2.9 %	145
Device Holder	±3.6%	N	1	1	1	±3.6 %	±3.6 %	5
Power Drift	±5.0%	R	.√3.	1	1	±2.9 %	±2.9 %	∞
Power Scaling	±0%	R	:√3.	1	1	±0.0 %	±0.0 %	∞
Phantom and Setup				•				•
Phantom Uncertainty	±6.1%	R	.√3.	1	1	±3.5 %	±3.5 %	∞
SAR correction	±1.9%	N	1	1	0.84	±1.9 %	±1.6 %	∞
Liquid Cond. (mea.)DAK	±2.5%	N	1	0.78	0.71	±2.0 %	±1.8 %	∞
Liquid Perm. (mea.)DAK	±2.5%	N	1	0.23	0.26	±0.6 %	±0.7 %	∞
Temp. unc. – Conductivity	±3.4%	R	:√3.	0.78	0.71	±1.5 %	±1.4 %	∞
Temp. unc. – Permittivity	±0.4%	R	.√3.	0.23	0.26	±0.1 %	±0.1 %	∞
Combined Std. Uncertainty					±11.3%	±11.2%	459	
Expanded STD Uncertainty					±22.6%	±22.4%		

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DASY5 Uncertainty Budge	et, accordin	to IEEE	1528 (3	- 6 GHz	range)			
Error Description	Uncert.	Prob.	Div.	(ci)	(ci)	Std. Unc.	Std. Unc.	(vi)
	value	Dist.	DIV.	1g	10g	(1g)	(10g)	veff
Measurement System								
Probe Calibration	±6.55 %	N	1	1	1	±6.55 %	±6.55 %	∞
Axial Isotropy	±4.7 %	R	.√ 3 .	0.7	0.7	±1.9 %	±1.9 %	∞
Hemispherical Isotropy	±9.6 %	R	:√3:	0.7	0.7	±3.9 %	±3.9 %	∞
Boundary Effects	±2.0 %	R	:√3:	1	1	±1.2 %	±1.2 %	∞
Linearity	±4.7 %	R	:√3:	1	1	±2.7 %	±2.7 %	∞
System Detection Limits	±1.0 %	R	:√3:	1	1	±0.6 %	±0.6 %	∞
Modulation Response	±2.4 %	R	:√3:	1	1	±1.4 %	±1.4 %	∞
Readout Electronics	±0.3 %	N	1	1	1	±0.3 %	±0.3 %	∞
Response Time	±0.8 %	R	.√ 3 .	1	1	±0.5 %	±0.5 %	∞
Integration Time	±2.6 %	R	:√3:	1	1	±1.5 %	±1.5 %	∞
RF Ambient Noise	±3.0 %	R	.√ 3 .	1	1	±1.7 %	±1.7 %	∞
RF Ambient Reflections	±3.0 %	R	.√3.	1	1	±1.7 %	±1.7 %	∞
Probe Positioner	±0.04 %	R	.√ 3 .	1	1	±0.0 %	±0.0 %	∞
Probe Positioning	±0.8 %	R	.√ 3 .	1	1	±0.5 %	±0.5 %	∞
Max. SAR Eval.	±4.0 %	R	.√ 3 .	1	1	±2.3 %	±2.3 %	∞
Test Sample Related			•	•	•			
Device Positioning	±2.9%	N	1	1	1	±2.9 %	±2.9 %	145
Device Holder	±3.6%	N	1	1	1	±3.6 %	±3.6 %	5
Power Drift	±5.0%	R	:√3:	1	1	±2.9 %	±2.9 %	∞
Power Scaling	±0%	R	:√3:	1	1	±0.0 %	±0.0 %	∞
Phantom and Setup								
Phantom Uncertainty	±6.6%	R	:√3:	1	1	±3.8 %	±3.8 %	∞
SAR correction	±1.9%	N	1	1	0.84	±1.9 %	±1.6 %	∞
Liquid Cond. (mea.)DAK	±2.5%	N	1	0.78	0.71	±2.0 %	±1.8 %	∞
Liquid Perm. (mea.) ^{DAK}	±2.5%	N	1	0.23	0.26	±0.6 %	±0.7 %	∞
Temp. unc. – Conductivity	±3.4%	R	:√3:	0.78	0.71	±1.5 %	±1.4 %	∞
Temp. unc. – Permittivity	±0.4%	R	:√3:	0.23	0.26	±0.1 %	±0.1 %	∞
Combined Std. Uncertainty				±11.9%	±11.8%	569		
Expanded STD Uncertainty					±23.8%	±23.6%		

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Report No.: 1911RSU052-U6



Annex A - System Check Result

Test Date: 12/14/2019

SystemPerformanceCheck-SAM2-D2450HSL

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used: f = 2450 MHz; $\sigma = 1.86 \text{ S/m}$; $\epsilon_r = 40.39$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

DASY5 Configuration:

Probe: EX3DV4 - SN7524; ConvF(7.5, 7.5, 7.5) @ 2450 MHz; Calibrated: 4/18/2019

Sensor-Surface: 4mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn1552; Calibrated: 5/23/2019

Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089

Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

configuration/d=10mm, Pin=250mW, dist=4mm (EX-Probe)/Area Scan (7x9x1): Measurement grid:

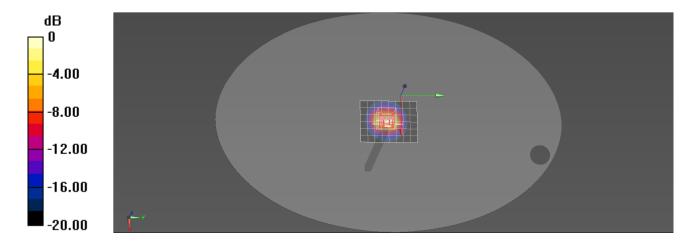
dx=12mm, dy=12mm; Maximum value of SAR (measured) = 14.9 W/kg

configuration/d=10mm, Pin=250mW, dist=4mm (EX-Probe)/Zoom Scan (7x7x7)/Cube

0: Measurement grid: dx=5mm, dy=5mm, dz=5mm; Reference Value = 106.2 V/m; Power Drift = -0.07 dB

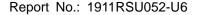
Peak SAR (extrapolated) = 28.9 W/kg

SAR(1 g) = 13.9 W/kg; SAR(10 g) = 6.49 W/kg Maximum value of SAR (measured) = 15.8 W/kg



0 dB = 15.8 W/kg = 11.99 dBW/kg

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Test Date: 12/16/2019

SystemPerformanceCheck-SAM2-D5250HSL

DUT: Dipole D5GHzV2; Type: D5GHzV2

Communication System: CW; Frequency: 5250 MHz; Duty Cycle: 1:1

Medium parameters used: f = 5250 MHz; σ = 4.64 S/m; ε_r = 35.39; ρ = 1000 kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 SN7524; ConvF(5.19, 5.19, 5.19) @ 5250 MHz; Calibrated: 4/18/2019
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1552; Calibrated: 5/23/2019
- Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

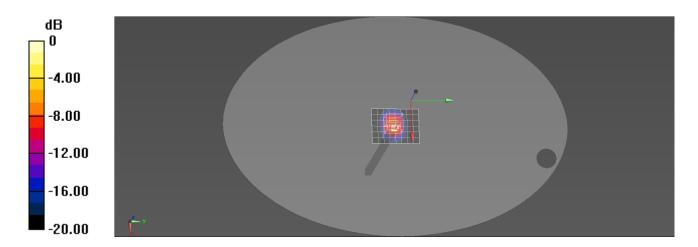
Configuration/d=10mm, Pin=100 mW, dist=2mm (EX-Probe)/Area Scan (7x9x1): Measurement grid: dx=10mm, dy=10mm; Maximum value of SAR (measured) = 14.2 W/kg

Configuration/d=10mm, Pin=100 mW, dist=2mm (EX-Probe)/Zoom Scan (8x8x8) (8x8x6)/Cube

0: Measurement grid: dx=4mm, dy=4mm, dz=2mm; Reference Value = 59.56 V/m; Power Drift = -0.01 dB

Peak SAR (extrapolated) = 35.1 W/kg

SAR(1 g) = 8.63 W/kg; SAR(10 g) = 2.46 W/kg Maximum value of SAR (measured) = 16.9 W/kg



0 dB = 16.9 W/kg = 12.28 dBW/kg

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Report No.: 1911RSU052-U6



Test Date: 12/16/2019

SystemPerformanceCheck-SAM2-D5600HSL

DUT: Dipole D5GHzV2; Type: D5GHzV2

Communication System: CW; Frequency: 5600 MHz; Duty Cycle: 1:1

Medium parameters used: f = 5600 MHz; σ = 5.03 S/m; ε_r = 34.75; ρ = 1000 kg/m³

Phantom section: Flat Section

DASY5 Configuration:

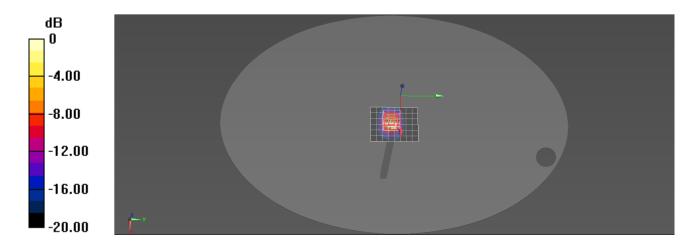
- Probe: EX3DV4 SN7524; ConvF(4.85, 4.85, 4.85) @ 5600 MHz; Calibrated: 4/18/2019
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1552; Calibrated: 5/23/2019
- Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Configuration/d=10mm, Pin=100mW, dist=2mm (EX-Probe)/Area Scan (7x9x1): Measurement grid: dx=10mm, dy=10mm; Maximum value of SAR (measured) = 13.1 W/kg

Configuration/d=10mm, Pin=100mW, dist=2mm (EX-Probe)/Zoom Scan (8x8x8) (8x8x6)/Cube

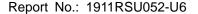
0: Measurement grid: dx=4mm, dy=4mm, dz=2mm; Reference Value = 52.26 V/m; Power Drift = 0.01 dB Peak SAR (extrapolated) = 38.2 W/kg

SAR(1 g) = 8.66 W/kg; SAR(10 g) = 2.45 W/kg Maximum value of SAR (measured) = 17.1 W/kg



0 dB = 17.1 W/kg = 12.33 dBW/kg

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Test Date: 12/16/2019

SystemPerformanceCheck-SAM2-D5750HSL

DUT: Dipole D5GHzV2; Type: D5GHzV2

Communication System: CW; Frequency: 5750 MHz; Duty Cycle: 1:1

Medium parameters used: f = 5750 MHz; σ = 5.21 S/m; ε_r = 34.47; ρ = 1000 kg/m³

Phantom section: Flat Section

DASY5 Configuration:

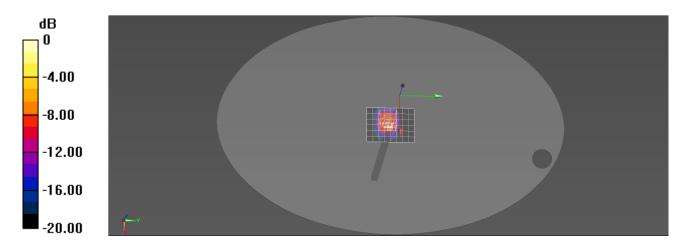
- Probe: EX3DV4 SN7524; ConvF(4.95, 4.95, 4.95) @ 5750 MHz; Calibrated: 4/18/2019
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1552; Calibrated: 5/23/2019
- Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Configuration/d=10mm, Pin=100 mW, dist=2mm (EX-Probe)/Area Scan (7x9x1): Measurement grid: dx=10mm, dy=10mm; Maximum value of SAR (measured) = 12.0 W/kg

Configuration/d=10mm, Pin=100 mW, dist=2mm (EX-Probe)/Zoom Scan (8x8x8) (8x8x6)/Cube

0: Measurement grid: dx=4mm, dy=4mm, dz=2mm; Reference Value = 47.70 V/m; Power Drift = 0.01 dB Peak SAR (extrapolated) = 37.4 W/kg

SAR(1 g) = 8.22 W/kg; SAR(10 g) = 2.33 W/kg Maximum value of SAR (measured) = 16.2 W/kg



0 dB = 16.2 W/kg = 12.10 dBW/kg

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Annex B - Test Data Plots

Plot 1#

Test Date: 12/16/2019

DUT: Standalone VR Headset; Type: Lenovo VR-3030S

Procedure Name: 802.11ac-VHT20 5785MHzMHz Towards Eyes

Communication System: 802.11ac; Frequency: 5785 MHz; Duty Cycle: 1:1

Medium parameters used: f = 5785 MHz; $\sigma = 5.26$ S/m; $\varepsilon_r = 34.41$; $\rho = 1000$ kg/m³; Tissue

Temp (celsius)-22.5°C; Phantom section: Flat Section

DASY5 Configuration:

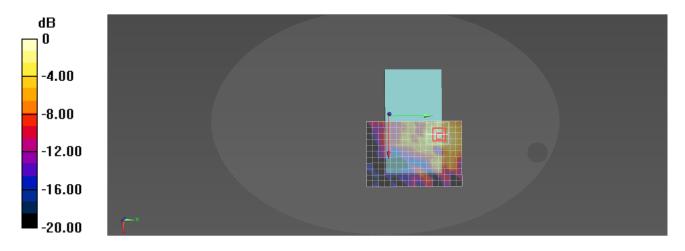
- Probe: EX3DV4 SN7524; ConvF(4.95, 4.95, 4.95) @ 5785 MHz; Calibrated: 4/18/2019
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1552; Calibrated: 5/23/2019
- Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Configuration/802.11ac-VHT20 5785MHzMHz Face Towards/Area Scan (12x17x1): Measurement grid: dx=10mm, dy=10mm; Maximum value of SAR (measured) = 0.138 W/kg

Configuration/802.11ac-VHT20 5785MHzMHz Face Towards/Zoom Scan (10x10x6)/Cube

0: Measurement grid: dx=4mm, dy=4mm, dz=2mm; Reference Value = 2.202 V/m; Power Drift = 0.12 dB Peak SAR (extrapolated) = 0.546 W/kg

SAR(1 g) = 0.068 W/kg; SAR(10 g) = 0.028 W/kg Maximum value of SAR (measured) = 0.153 W/kg



0 dB = 0.153 W/kg = -8.15 dBW/kg

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Plot 2#

Test Date: 12/16/2019

DUT: Standalone VR Headset; Type: Lenovo VR-3030S

Procedure Name: 802.11ac-VHT20 5785MHzMHz Towards Eyes

Communication System: 802.11ac; Frequency: 5785 MHz; Duty Cycle: 1:1

Medium parameters used: f = 5785 MHz; σ = 5.26 S/m; ε_r = 34.41; ρ = 1000 kg/m³; Tissue

Temp (celsius)-22.5°C; Phantom section: Flat Section

DASY5 Configuration:

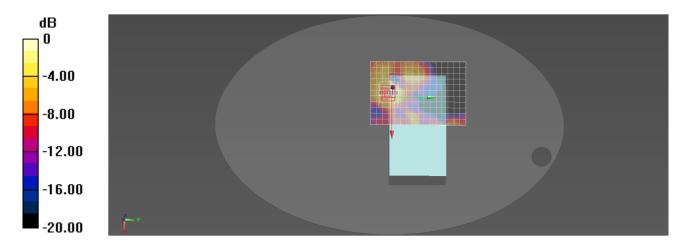
- Probe: EX3DV4 SN7524; ConvF(4.95, 4.95, 4.95) @ 5785 MHz; Calibrated: 4/18/2019
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1552; Calibrated: 5/23/2019
- Phantom: SAM2; Type: QD OVA 004 AA; Serial: 2089
- Measurement SW: DASY52, Version 52.10 (2); SEMCAD X Version 14.6.12 (7450)

Configuration/802.11ac-VHT20 5785MHzMHz Face Towards/Area Scan (12x17x1): Measurement grid: dx=10mm, dy=10mm; Maximum value of SAR (measured) = 0.183 W/kg

Configuration/802.11ac-VHT20 5785MHzMHz Face Towards/Zoom Scan (10x9x6)/Cube

0: Measurement grid: dx=4mm, dy=4mm, dz=2mm; Reference Value = 2.080 V/m; Power Drift = 0.09 dB Peak SAR (extrapolated) = 1.31 W/kg

SAR(1 g) = 0.121 W/kg; SAR(10 g) = 0.046 W/kg Maximum value of SAR (measured) = 0.194 W/kg



0 dB = 0.194 W/kg = -7.12 dBW/kg

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Annex C - SAR Test Setup Photos

Please refer to document "1911RSU052-UT".

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Annex D - EUT External Photos

Please refer to document "1911RSU052-UE".

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Annex E - Equipment Calibration Report

Please refer to document "Annex E - Equipment Calibration Report.pdf".

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The End