

SAR Test Report - New Filing

Applicant:



Harris Corporation
221 Jefferson Ridge Parkway
Lynchburg, VA, 24501
USA

Maximum Reported 1g SAR			
FCC	HEAD:	1.00	W/kg
	BODY:	1.82	
ISED	HEAD:	1.00	
	BODY:	1.92	
General Pop. Limit:		8.00	

FCC ID:

OWDTR-0153-E

Product Model Number / HVIN

See Section 2.0

IC Registration Number

3636B-0153

Product Name / PMN

XL-185P

In Accordance With:

FCC 47 CFR §2.1093

Radiofrequency Radiation Exposure Evaluation: Portable Devices

IC RSS-102 Issue 5

Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)

Approved By:



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Test Lab Certificate: 2470.01



**Industry
Canada**

IC Registration 3874A-1



FCC Registration: 714830

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1.0 DOCUMENT CONTROL

Samples Tested By:	Trevor Whillock		
Report Prepared By:	Art Voss		
Report Reviewed By:	Ben Hewson		
Report Issue Number	Description	By	Report Issue Date
R1.0	Initial Release	Art Voss	21 September 2017

2.0 CLIENT AND DEVICE INFORMATION

Client Information	
Applicant Name	Harris Corporation
Applicant Address	221 Jefferson Ridge Parkway
	Lynchburg, VA, 24501
	USA
DUT Information	
Device Identifier(s):	FCC ID: OWDTR-0153-E
	IC: 3636B-0153
Type of Equipment:	Licensed Non-Broadcast Transmitter Held to Face (TNF) FCC Part 90
	Land Mobile Radio Transmitter/Receiver (27.41-960MHz) RSS-119
	Digital Transmission System (DTS) FCC Part 15, RSS 247
	Unlicensed National Information Infrastructure (NII) FCC Part 15
	Spread Spectrum Transmitter (DSS) FCC Part 15
Device Model(s) / HVIN:	XS-PFSVM-C1D1
	XS-PFSVY-C1D1
Device Marketing Name / PMN:	XL-185P
Test Sample Serial No.:	A-40192000001
Transmit Frequency Range:	VHF Band: 136-174MHz
	WLAN: 2412-2462MHz, 5180-5825MHz
	BT/BLE: 2402-2480MHz
Number of Channels:	Programmable
Manuf. Max. Rated Output Power:	VHF Band: 6W, BT: 50mW, BLE: 7mW
	WLAN 2.4G: 234mW / WLAN 5G: 15 mW
Modulation:	LMR: FM
Duty Cycle:	50% PTT Duty Cycle
DUT Power Source:	7.2 VDC Li-Ion 22Wh Rechargeable Battery
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

3.0 SCOPE OF EVALUATION/DATA REUSE

The XL-185P C1D1, FCC ID: OWDTR-0153-E, ISEDC ID: 3636B-0153 is a single-band, Push-To-Talk (PTT) Licensed Mobile Radio (LMR) transceiver intended for Occupational Use. It incorporates WiFi and BlueTooth transmitters. The XL-185P C1D1 is identical in RF circuitry to the XL-200P C1D1 Rebanded, FCC ID: OWDTR-0144-E, ISEDC ID: 3636B-0144 multi-band radio with the exception that it has been modified by removing components to make it a single band radio. It includes the addition of a new battery, P/N 14034-4045-01, which has been designed to meet C1D1 Safety Standards. A metal shield is included and is placed between the battery pack and the DUT .

In this document, the following DUT references are made:

The XL-185P C1D1, FCC ID: OWDTR-0153-E, ISEDC ID: 3636B-0153 is referenced as XL-185P

The XL-200P C1D1 Rebanded, FCC ID: OWDTR-0144-E, ISEDC ID: 3636B-0144 is referenced as XL-200P

The Test Plan developed for this evaluation leverages SAR test data from previous evaluations of the XL-200P, per FCC KDB 484596, and is based on test channels, configurations and accessories which produced the highest (*worst case*) SAR. The previous *worst case* configurations of the XL-200P were re-evaluated during the course of this investigation to establish a base-line for comparison of test data from the XL-185P. The basis for the *worst case* configurations of the XL-185P are as follows:

3.1 Previous XL-200P Test Data

Worst Case Test Data from XL-200P							
Model:	XL-200P						
FCC ID:	OWDTR-0144-E						
Variant:	System Radio						
Date Evaluated:	June 2017						
Reference Report:	45461392 R2.1						
Frequency	Configuration	Antenna	Accessory 1	Accessory 1	SAR (50% PTT)	Band	Spot Check
136	Head	14035-4000-01	n/a	n/a	0.86	LMR	Y
156.8	Body	14035-4000-01	B1	A1	2.15		Y
Frequency	Configuration	Antenna**	Accessory 1	Accessory 1	SAR (100%)	Band	Spot Check
2437	Body	14035-4440-01	B1	A1	0.006	Wifi	Y
5260*	Body	14035-4440-01	B1	A1	0.031		
2480	Body	14035-4440-01	B1	A1	0.006	BT	Y

*The highest reported SAR from this evaluation in the WiFi and BT bands was on the system Variant of the XL-200P in the Body Configuration. As a result spot checks in these bands will be done in the Body configuration.

** The WiFi and BT transmitters do not share the same antenna as the LMR antennas. It has been demonstrated on evaluations of similar variants that the LMR antennas have no impact on the WiFi or BT SAR.

Note: The highest reported SAR in the 5GHz WiFi band occurred at 5260MHz which is not supported by this device. SAR was measured on supported channels in the 5GHz during this evaluation. The highest reported SAR from all variants from all previous evaluations in the WiFi and BlueTooth bands will be used for the purposes of simultaneous transmission.

Note: The four single band C1D1 variants of the XL-185P, FCC IDs: OWDTR-0151-E, -0152-E, -0153-E and -0154-E, ISEDC IDs: 3636B-0151, -1052, -0153, -0154, were all evaluate at the same time. They are identical in all aspects, including RF circuitry, PCB layout and form factor with the exception of component population options to operate in different LMR bands. The WiFi and BlueTooth circuitry, PCB and antenna layouts are identical on all variants. Measurements performed in the WiFi and BlueTooth bands were performed on the LX-185P Non-Rebanded variant, FCC ID OWDTR-0151-E, ISEDC ID: 3636B-0151, and are valid for the other three variants evaluated.

4.0 NORMATIVE REFERENCES

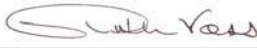

Normative References*	
ANSI / ISO 17025:2005	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2 Title 47: Part 2.1093:	Code of Federal Regulations Telecommunication Radiofrequency Radiation Exposure Evaluation: Portable Devices
Health Canada Safety Code 6 (2015)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3kHz to 300GHz
Industry Canada Spectrum Management & Telecommunications Policy RSS-102 Issue 5:	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
IEEE International Committee on Electromagnetic Safety 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
IEC International Standard IEC 62209-2 2010	Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 2
FCC KDB KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
FCC KDB KDB 643646 D01v01r03	SAR Test Reduction Considerations for Occupational PTT Radios
* When the issue number or issue date is omitted, the latest version is assumed.	

5.0 STATEMENT OF COMPLIANCE

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

Applicant: Harris Corporation	Product / PMN XL-185P	
Standard(s) Applied: FCC 47 CFR §2.1093 Health Canada's Safety Code 6	Measurement Procedure(s): FCC KDB 865664, FCC KDB 447498, FCC KDB 643646 Industry Canada RSS-102 Issue 5 IEEE Standard 1528-2013, IEC 62209-2	
Reason For Issue: <input checked="" type="checkbox"/> New Certification <input type="checkbox"/> Class I Permissive Change <input type="checkbox"/> Class II Permissive Change	Use Group: <input type="checkbox"/> General Population / Uncontrolled <input checked="" type="checkbox"/> Occupational / Controlled	Limits Applied: <input type="checkbox"/> 1.6W/kg - 1g Volume <input checked="" type="checkbox"/> 8.0W/kg - 1g Volume <input type="checkbox"/> 4.0W/kg - 10g Volume
Reason for Change: Original Filing	Date(s) Evaluated: 30 Aug 2017 - 5 Sep 2017	

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

<p>I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.</p>	
	<p>Art Voss, P.Eng. Technical Manager Celltech Labs Inc. 21 September 2017 Date</p> 

6.0 RF CONDUCTED POWER MEASUREMENT

Table 6.0 Conducted Power Measurements

Measured Conduced Power					
Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dBm)	SAR Test Channel (Y/N)
136.0000	35.87	37.80	6.00	-1.93	Y
138.0000	35.87	37.80	6.00	-1.93	N
141.0000	35.91	37.80	6.00	-1.89	N
144.0000	35.92	37.80	6.00	-1.88	N
148.0000	35.91	37.80	6.00	-1.89	N
150.0000	35.93	37.80	6.00	-1.87	N
156.8000	35.97	37.80	6.00	-1.83	Y
162.0000	36.00	37.80	6.00	-1.80	Y
174.0000	35.98	37.80	6.00	-1.82	N
Notes:					
The Conducted Power of the DUT was measured at the antenna port, with a fully charged battery and transmitting at 100% duty cycle.					

7.0 NUMBER OF TEST CHANNELS (N_c)

This device is identical to the XL-200P C1D1 Rebanded , FCC ID: OWDTR-0144-E, ISEDC ID: 3636B-0144 multi band radio with the exception that it has been modified by removing components to make it a single band radio.. The number of channels and channel frequencies tested are based on *worst case* configurations from previous test data from the original filing of this device. Reference **Section 3.0 Scope of Evaluation**.

8.0 ACCESSORIES EVALUATED

Table 8.0 Manufacturer's Accessory List

Change History			
Change ID	Date	Change Type	Description of Change
1	15 June 2017	Initial	Initial Filing

Manufacturer's Accessory List							
Test Report ID Number	Manufacturer's Part Number	Description	Change ID ⁽¹⁾	UDC Group ⁽²⁾	Type II Group ⁽³⁾	SAR ⁽⁴⁾ Evaluated	SAR ⁽⁵⁾ Tested
Antenna							
T4	14035-4000-01	Full Spectrum Whip Antenna	1			Y	Y
T5	14035-4420-01	Wideband Whip, UHF, 7/800 MHz	5			Y	Y
T6	14035-4440-01	1/2 Wave Whip Antenna, 7/800 MHz	4			Y	Y
T7	14035-4440-02	1/4 Wave Stub Antenna, 7/800 MHz	4			Y	Y
Battery							
P3	14035-4045-01	Li-Ion Battery 7.2VDC, 3100mAh C1D1	1			Y	Y

Manufacturer's Accessory List							
Test Report ID Number	Manufacturer's Part Number	Description	Change ID ⁽¹⁾	UDC Group ⁽²⁾	Type II Group ⁽³⁾	SAR ⁽⁴⁾ Evaluated	SAR ⁽⁵⁾ Tested
Audio Accessory							
A1	12082-0600-01	Standard Speaker Microphone	1	7A	PB	Y	Y
A2	12082-0600-02	Storm Speaker Microphone	1	7A	PB	Y	Y
A28	12082-0600-03	Storm Speaker Microphone, 18"	6	7A	PB	Y	Y
A16	12082-0650-13	Headset, Heavy Duty, BTH, w/PTT, XG-100P	3	7A	IL	Y	Y
A17	12082-0650-14	Headset, Heavy Duty, OTH, w/PTT, XG-100P	3	7A	IL	Y	-
A26	LS103239V1	Earphone, Lapel MIC, 2.5mm	3	n/a	n/a	Y	Y
A27	LS103239V2	Earphone, Lapel MIC, 2.5mm, Right Angle	4	n/a	n/a	Y	-
A29	12082-0600-04	Storm Speaker Microphone 25.6"	1	7A	PB	Y	Y
A30	12082-0600-05	Storm Speaker Microphone, 30"	6	7A	PB	Y	Y

Manufacturer's Accessory List							
Test Report ID Number	Manufacturer's Part Number	Description	Change ID ⁽¹⁾	UDC Group ⁽²⁾	Type II Group ⁽³⁾	SAR ⁽⁴⁾ Evaluated	SAR ⁽⁵⁾ Tested
Body-Worn Accessory							
B1	12082-1290-01	Metal Belt Clip	1			Y	Y
B2	12082-3230-01	D-Swivel (Used w/ 14002-0218-01 and KRY 1011609/1)	1			Y	Y
B3	14002-0218-01	Premium Belt Loop	1			Y	Y
	12082-1398-01	Side Connector Cover	3			Y	Y
B15	KRY 1011609/1	Leather Belt Loop	1			Y	Y

(1) From Table 6.0 - Indicates which change the item was introduced or tested. A "****" in this column indicates these accessories were evaluated on similar product and are deemed compliant.

(2) UDC Group: 9 = 9 Pin, 7A = 7 Pin, 7B = 7 Pin Modified

(3) Type II Group: PB = Palm Button, IL = In-Line Pushbutton, PT = Pigtail Pushbutton, RB = Ring Pushbutton, BB = Body Button, BT = Bluetooth

(4) Accessories are categorized into groups of similar design and construction. Samples of individual groups are SAR Tested and the SAR results apply to ALL members of the Accessory Group. A "Y" in this column indicates the accessory is deemed acceptable.

(5) Accessories and/or Accessory Group members SAR Tested.

9.0 SAR MEASUREMENT SUMMARY

Table 9.0: Measured Results – BODY

Measured SAR Results (1g) - BODY Configuration (FCC/ISED)															
Date	Plot ID	DUT		Test Frequency (MHz)	Modulation	Accessories				DUT Spacing		Conducted Power (dBm)	Measured SAR (10g)		SAR Drift (dB)
		M/N	Type			Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)		100% DC (W/kg)	50% DC (W/kg)	
VHF Band															
30 Aug 2017	B1*	XL-200P C1D1	0144-E	156.8	CW	4045-01	4000-01	B1	A1	0	22	38.31	3.730	1.865	-0.205
30 Aug 2017	B2*	XL-200P C1D1	0146-E	156.8	CW	4045-01	4000-01	B1	A1	0	22	38.28	3.840	1.920	-0.161
30 Aug 2017	B3	XL-185P C1D1	0153-E	156.8	CW	4045-01	4000-01	B1	A1	0	22	33.97	1.510	0.755	-0.142
30 Aug 2017	B4	XL-185P C1D1	0153-E	162	CW	4045-01	4000-01	B1	A1	0	22	35.83	2.340	1.170	-0.221
2.4GHz WiFi BODY															
13 Sep 2017	B5	XL-185P C1D1	0151-E	2412	CW	4045-01	4440-01	B1	A1	0	30	24	0.000	n/a	(a)
13 Sep 2017	B6	XL-185P C1D1	0151-E	2437	CW	4045-01	4440-01	B1	A1	0	30	24	0.001	n/a	(a)
13 Sep 2017	B7	XL-185P C1D1	0151-E	2462	CW	4045-01	4440-01	B1	A1	0	30	24	0.000	n/a	(a)
2.4GHz BT BODY															
12 Sep 2017	B8*	XL-200P C1D1	0144-E	2480	CW	4045-01	4440-01	B1	A1	0	30	17	0.000	n/a	(a)
12 Sep 2017	B9*	XL-200P C1D1	0146-E	2480	CW	4045-01	4440-01	B1	A1	0	30	17	0.000	n/a	(a)
12 Sep 2017	B10	XL-185P C1D1	0153-E	2480	CW	4045-01	4440-01	B1	A1	0	30	17	0.000	n/a	(a)
5GHz BT BODY															
14 Sep 2017	B11*	XL-200P C1D1	0144-E	5180	CW	4045-01	4440-01	B1	A1	0	30	12	0.001	n/a	(a)
14 Sep 2017	B12*	XL-200P C1D1	0146-E	5180	CW	4045-01	4440-01	B1	A1	0	30	12	0.001	n/a	(a)
14 Sep 2017	B13	XL-185P C1D1	0153-E	5180	CW	4045-01	4440-01	B1	A1	0	30	12	0.001	n/a	(a)
14 Sep 2017	B14	XL-185P C1D1	0151-E	5240	CW	4045-01	4440-01	B1	A1	0	30	12	0.000	n/a	(a)
SAR Limit						Spatial Peak				Head/Body		RF Exposure Category			

Table 9.1: Measured Results – FACE

Measured SAR Results (1g) - FACE Configuration (FCC/ISED)															
Date	Plot ID	DUT		Test Frequency (MHz)	Modulation	Accessories				DUT Spacing		Conducted Power (dBm)	Measured SAR (10g)		SAR Drift (dB)
		M/N	Type			Antenna ID	Battery ID	Body ID	Audio ID	DUT (mm)	Antenna (mm)		100% DC (W/kg)	50% DC (W/kg)	
VHF Band LMR															
05 Sep 2017	F1*	XL-200P C1D1	0144-E	136	CW	4045-01	4000-01	n/a	n/a	25	52	38.42	1.490	0.745	-0.346
05 Sep 2017	F2*	XL-200P C1D1	0146-E	136	CW	4045-01	4000-01	n/a	n/a	25	52	38.41	1.430	0.715	-0.275
05 Sep 2017	F3	XL-185P C1D1	0153-E	136	CW	4045-01	4000-01	n/a	n/a	25	52	34.65	0.513	0.257	-0.269
05 Sep 2017	F4	XL-185P C1D1	0153-E	156.8	CW	4045-01	4000-01	n/a	n/a	25	52	33.97	0.398	0.199	-0.155
05 Sep 2017	F5	XL-185P C1D1	0153-E	162	CW	4045-01	4000-01	n/a	n/a	25	52	35.83	1.260	0.630	-0.002
SAR Limit							Spatial Peak			Head/Body		RF Exposure Category			

* Baseline Measurements

(a) The Bluetooth and WiFi antennas are located on the side of the DUT. Due to the location of the Bluetooth and WiFi antennas, the minimum phantom separation distance in the BODY or FACE configurations that could be achieved is greater than 30mm. The measured SAR values approximated noise floor measurements resulting in inconsistent power drift measurements and are omitted in this table.

Note: The WiFi and Bluetooth channels evaluated on the XL-185P produced worst case SAR in the BODY Configurations.

Note: This device does not support Bluetooth (voice) activated transmission devices therefore 50% PTT is applied.

10.0 ANALYSIS OF SIMULTANEOUS TRANSMISSION

Simultaneous Transmission Analysis

Introduction

The XL-185P incorporates integrated WiFi and BlueTooth transmitters capable of simultaneously transmitting, in any combination, with the LMR transmitter. As per FCC KDB 447498, simultaneous transmission analysis is required for devices capable of simultaneous transmission. The WiFi and BT 1g SAR are subject to General Population limits of 1.6W/kg. The LMR 1g SAR is subject to Occupational of 8.0W/kg. To determine compliance when different SAR limits are applied to the different transmit modes, the Sum-of-the-Ratios of the SAR to the respective SAR limit is applied. When the Sum-of-the-Ratios is ≤ 1.0 , simultaneous SAR test exclusion may be applied.

SAR for each transmission band, transmission mode and/or equipment class was evaluated with Body-Worn and Audio Accessories in the BODY and HEAD configurations. Only the Maximum maximum reported SAR for each is used in the Sum-of-the-Ratios calculation and the worst case of all possible combinations is considered.

Table 10.0 List of Possible Transmitters

List of Possible Transmitters				
Type	Class	Frequency Range		Rated Output Power (dBm)
		Lower (MHz)	Upper (MHz)	
LMR VHF	TNF	136.0	174.0	37.8
BlueTooth	DSS	2402.0	2480.0	17.0
BLE	DTS	2402.0	2480.0	8.5
WiFi 2.4	DTS	2412.0	2462.0	24.0
WiFi 5	NII	5150.0	5850.0	12.0

Table 10.1 List of Possible Transmitters Combinations


Simultaneous Transmitter Combinations					
Configuration Number	Transmitter				
	LMR	BlueTooth	BLE	WiFi 2.4	WiFi 5
1	X	X			
2	X		X		
3	X			X	
4	X				X

 Indicates this configuration is not supported

Note: The WiFi and BlueTooth transmitters share the same antenna and cannot simultaneously transmit.

Table 10.2 Analysis of Sum-of-the-Ratios

Analysis of Sum-of-the-Ratios For All Transmitters and Configurations													
Configuration Number	Configuration	Transmitter Type								Sum of Ratios	Sum of SARs (W/kg)		
		LMR Band		BlueTooth		BLE		WiFi 2.4				WiFi 5	
		<u>stand-alone</u>	Ratio	<u>stand-alone</u>	Ratio	<u>stand-alone</u>	Ratio	<u>stand-alone</u>	Ratio			<u>stand-alone</u>	Ratio
		SAR (W/kg)	to Limit	SAR (W/kg)	to Limit	SAR (W/kg)	to Limit	SAR (W/kg)	to Limit			SAR (W/kg)	to Limit
SAR Limit = 8.0W/kg (Occupational)		SAR Limit = 1.6W/kg (General Population)											
1	HEAD	0.954	0.119	0.006	0.004							0.123	0.960
2		0.954	0.119			0.048	0.030					0.149	1.002
3		0.954	0.119					0.005	0.003			0.122	0.959
4		0.954	0.119							0.031	0.019	0.139	0.985
1	BODY	1.770	0.221	0.006	0.004							0.225	1.776
2		1.770	0.221			0.048	0.030					0.251	1.818
3		1.770	0.221					0.005	0.003			0.224	1.775
4		1.770	0.221							0.031	0.019	0.241	1.801

 Indicates this combination is not supported

Test Exclusion of the BlueTooth Low Energy (BLE) transmitter is evaluated using Max Power = 8.4dBm (7mW), Separation Distance = 30mm*, Transmit Frequency = 2.480GHz.

Per KDB 447498 D01v06 [4.3.1(a)], SAR Test Exclusion is given by:

$$[(\text{Max Power, mW}) / (\text{Separation Distance, mm})] * [\sqrt{f, \text{GHz}}] \leq 3.0 \text{ for } 1\text{g SAR}$$

$$[(7)/(30)] * [\sqrt{2.480}] = 0.362 \leq 3.0$$

Therefore the BlueTooth transmitter meets the SAR Test Exclusion criteria.

For reference only, per KDB 447498 D01v06 [4.3.2(b)], the estimated BlueTooth SAR is given by:

$$[(\text{Max Power, mW}) / (\text{Separation Distance, mm})] * [(\sqrt{f, \text{GHz}}) / (x)], \text{ where } x = 7.5 \text{ for } 1\text{g SAR}$$

$$[(7)/(30)] * [(\sqrt{2.480}) / (7.5)] = 0.048\text{W/kg}$$

From Table 10.2, the Sum-of-the-Ratios for any given simultaneous transmission combination, when applied to their respective SAR limit, does not exceed 1.0. No further analysis is required.

Note: The WiFi and BlueTooth SAR values shown in this table are the highest *worst case* SAR values from all configurations and transmission modes from all variants of the XL-185P series of radios. They are applied in this table to illustrate the most conservative ratio.

* Due to the location of the BlueTooth and WiFi antennas, the minimum phantom separation distance in the BODY or FACE configurations that could be achieved is greater than 30mm.

11.0 SCALING OF MAXIMUM MEASURE SAR

Table 11.0 SAR Scaling

Scaling of Maximum Measured SAR ⁽¹⁾									
Plot ID	Configuration	Freq (MHz)	Measured Fluid Deviation		Measured Conducted Power (dBm)	Measured Drift (dB)	Measured SAR (1g) (W/kg)		
			Permittivity	Conductivity					
F5	Face	162	-3.22%	2.86%	36.0	-0.002	0.630		
B4	Body	162	-1.18%	-0.25%	36.0	-0.221	1.170		
Step 1									
Fluid Sensitivity Adjustment									
Plot ID	Scale Factor (%)		x	Measured SAR (W/kg)	=	Step 1 Adjusted SAR (1g) (W/kg)			
	F5	1.000%				0.630	=	0.630	
B4	1.000%		x	1.170	=	1.170			
Step 2									
Manufacturer's Tune-Up Tolerance									
Plot ID	Measured Conducted Power (dBm)		Rate d Power (dBm)		Delta (dB)	+	Step 1 Adjusted SAR (W/kg)	=	Step 2 Adjusted SAR (1g) (W/kg)
	F5	36.0		37.8					
B4	36.0		37.8		1.800	+	1.170	=	1.770
Step 3									
Simultaneous Transmission - Bluetooth and/or WiFi									
Plot ID	Rated Output Power (Pmax) (mW)	Freq (MHz)	Separation Distance (m m)		Estimated SAR (W/kg)	+	Step 2 Adjusted SAR (W/kg)	=	Step 3 Adjusted SAR (1g) (W/kg)
	F5								
B4					0.05	+	1.770	=	1.820
Step 4									
Drift Adjustment									
Plot ID	Measured Drift (dB)		+	Step 3 Adjusted SAR (W/kg)		=	Step 4 Adjusted SAR (1g) (W/kg)		
	F5	-0.002		1.004			=	1.004	
B4	-0.221		+	1.820		=	1.915		
Step 5									
Reported SAR									
Plot ID	FCC From Steps 1 through 3 1g SAR (W/kg)				IC From Steps 1 through 4 1g SAR (W/kg)				
	F5	1.00				1.00			
B4	1.82				1.92				

NOTES to Table 10.0

(1) Scaling of the Maximum Measured SAR is based on the highest, 100% duty cycle, Face, Body and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters apply only to deviation of the tissue equivalent fluids used at the frequencies which produced the highest measured SAR. The Measured Conducted Power applies to the Conducted Power measured at the frequencies producing the highest Face and Body SAR. The Measured Drift is the SAR drift associated with that specific SAR measurement. The Reported SAR is the accumulation of all SAR Adjustments from the applicable Steps 1 through 4. The Plot ID is for identification of the SAR Measurement Plots in Annex A of this report.

NOTE: Some of the scaling factors in Steps 1 through 4 may not apply and are identified by light gray text.

Step 1

Per IEC-62209-1 and FCC KDB 865664. Scaling required only when Measured Fluid Deviation is greater than 5%. If the Measured Fluid Deviation is greater than 5%, Table 10.1 will be shown and will indicate the SAR scaling factor in percent (%). SAR is MULTIPLIED by this scaling factor only when the scaling factor is positive (+).

Step 2

Per KDB 447498. Scaling required only when the difference (Delta) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative. The absolute value of Delta is ADDED to the SAR.

Step 3

Per KDB 447498 4.3.2. The SAR, either measured or calculated, of ANY and ALL simultaneous transmitters must be added together and includes all contributors.

Step 4

Per IEC 62209-1. Scaling required only when Measured Drift is (-) Negative. The absolute value of Measured Drift is added to Reported or Simultaneous Reported SAR.

Step 5

The Reported SAR is the Maximum Final Adjusted Cumulative SAR from the applicable Steps 1 through 4 and are reported on Page 1 of this report.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.



Trevor Whillock
Test Lab Engineer
Celltech Labs Inc.

21 September 2017
Date

12.0 SAR EXPOSURE LIMITS

Table 12.0 Exposure Limits

SAR RF EXPOSURE LIMITS			
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population / Uncontrolled Exposure⁽⁴⁾	Occupational / Controlled Exposure⁽⁵⁾
Spatial Average⁽¹⁾ (averaged over the whole body)		0.08 W/kg	0.4 W/kg
Spatial Peak⁽²⁾ (Head and Trunk averaged over any 1 g of tissue)		1.6 W/kg	8.0 W/kg
Spatial Peak⁽³⁾ (Hands/Wrists/Feet/Ankles averaged over 10 g)		4.0 W/kg	20.0 W/kg
(1) The Spatial Average value of the SAR averaged over the whole body.			
(2) The Spatial Peak value of the SAR averaged over any 1 gram of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.			
(3) The Spatial Peak value of the SAR averaged over any 10 grams of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.			
(4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.			
(5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.			

13.0 DETAILS OF SAR EVALUATION

13.1 Day Log

DAY LOG					Fluid Dielectric	SPC	Test
Date	Ambient Temp °C	Fluid Temp °C	Humidity	TSL			
29 Aug 2017	28	24.3	29%	150B	X	X	
30 Aug 2017	25	23.5	30%	150B			X
5 Sep 2017	27	22.8	27%	150H	X	X	X

13.2 DUT Setup and Configuration

DUT Setup and Configuration	
Overview	<p>The XL-185P is identical in electronic circuitry to the XL-200P with the exception that it had been designed to be a Single Band Radio.</p> <p>The number of test channels and test configurations performed on this device were based on the antenna and accessory combinations which produced the highest, or worst case, SAR from previous SAR evaluations of the XL-200P, FCC ID: OWDTR-0144-E, ISEDC ID: 3636B-0144. Section 3.0 identifies those test channels and each channel was tested in the BODY and FACE configuration.</p> <p>Sample measurements of the original XL-200P in the worst case configurations were made and compared to previous measurement data taken from the same XL-200P in the same configurations from the original filing and used to establish a base-line. Measurements from the XL-185P in the same configurations were compared to the base-line measurements and were found to be within 5% of the base-line. From this, justification is made for the determination of test channels, configurations and accessory combinations.</p> <p>The XL-185P was evaluated at the maximum conducted output power level, preset by the manufacturer, with a fully charged battery in unmodulated continuous transmit operation (Continuous Wave mode at 100% duty cycle) with the transmit key continuously depressed. For a Push-To-Talk (PTT) device with a manually operated transmit pushbutton, a 50% duty cycle compensation for the <u>reported SAR</u> was used, as per FCC KDB 447498 (6.1). This was applied only to the LMR bands.</p> <p>The test procedures outlined in FCC KDB 643646 "SAR Test Reduction Considerations for Occupational PTT Radios" as well as FCC KDB 865664, ISEDC RSS-102 and IEEE 1528 were used throughout the evaluation of this device in the LMR bands.</p>

13.3 DUT Positioning

DUT Positioning	
Positioning	<p>The DUT Positioner was securely fastened to the Phantom Platform. Registration marks were placed on the DUT and the Positioner to ensure consistent positioning of the DUT for each test evaluation.</p>
FACE Configuration	<p>The DUT was securely clamped into the device holder with the surface of the DUT normally held to the user's face facing the phantom. The device holder was adjusted to ensure that the horizontal axis of the DUT was parallel to the bottom of the phantom. A 25mm spacer block was used to set the separation distance between the DUT and the phantom to 25mm. When applicable and unless by design, the antenna of the DUT was prevented from sagging away from the phantom. The spacer block was removed before testing.</p>
BODY Configuration	<p>Body-Worn and Audio Accessories were affixed to the DUT in the manner in which they are intended to be used. The DUT, with its accessories, were securely clamped into the device holder with the surface of the DUT normally in contact with the body in direct contact with the bottom of the phantom, or 0mm separation from the DUT's accessory to the phantom. Body-Worn Accessory straps, linkages, etc. were positioned in a fashion resembling that for which they were intended to be used. Audio Accessory cables, etc., were positioned in a fashion resembling that for which they were intended to be used.</p>
HEAD Configuration	<p>This device is not intended to be held to the ear and was not tested in the HEAD configuration.</p>

13.4 General Procedures and Report

General Procedures and Reporting	
General Procedures	<p>The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to $\pm 0.5^{\circ}\text{C}$. The Active TSL temperature was maintained to within $\pm 1.0^{\circ}\text{C}$ throughout the test series. TSL analysis and SPC were repeated when the Active TSL use exceeded 84 hours.</p> <p>An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the <u>Maximum Distance to Phantom Surface</u> to the fluid surface was performed following the power drift measurement.</p>
Reporting	<p>The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the 100% DC (Duty Cycle) column are the SAR values reported by the SAR Measurement Server with the DUT operating at 100% transmit duty cycle. The SAR values in the 50% DC column have been scaled by 50% for 50% Push-To-Talk duty cycle compensation. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance.</p> <p>In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY and FACE configurations, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are <u>ONLY</u> scaled up, not down. The final results of this scaling is the <u>reported SAR</u> which appears on the Cover Page of this report.</p>

13.5 Fluid Dielectric and Systems Performance Check

Fluid Dielectric and Systems Performance Check	
Fluid Dielectric Measurement Procedure	<p>The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running Aprel Dielectric Property Measurement System. A frequency range of $\pm 100\text{MHz}$ for frequencies $> 300\text{MHz}$ and $\pm 50\text{MHz}$ for frequencies $\leq 300\text{MHz}$ with frequency step size of 10MHz is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at 23°C in a 300ml beaker) method. A sample of the TSL is placed in a 300ml beaker and the open-ended coax is submerged approximately 8mm below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the FCC OET Bulletin 65 Supplement C targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are $> 5\%$ in range that the DUT is to be tested. If the adjustments fail to bring the parameters to $\leq 5\%$ but are $< 10\%$, the SAR Fluid Sensitivity as per IEC 62201-1 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters $> 10\%$ in the DUT test frequency range are not used.</p>
Systems Performance Check	<p>The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the 10MHz step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the 10MHz step intervals.</p> <p>A Systems Performance Check (SPC) is performed in accordance with IEEE 1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the 1g and 10g SAR is measured. The measured 1g and 10g SAR is compared to the 1g and 10g SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to 1.0W and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is $\leq 10\%$ of the measured and normalize SAR of the validation source's Calibration Certificate.</p> <p>The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than 84 hours or if the Active TSL temperature has exceed $\pm 1^\circ\text{C}$ of the initial fluid analysis.</p>

13.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	$4 \pm 1 \text{ mm}$
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	$5^\circ \pm 1^\circ$
Area Scan Spatial Resolution $\Delta X, \Delta Y$	15 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	7.5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	$150 \pm 5 \text{ mm}$
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

13.7 Scan Resolution 2GHz to 3GHz

Scan Resolution 2GHz to 3GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	12 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	5 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	5 mm
Zoom Scan Volume X, Y, Z	30 mm
Phantom	ELI
Fluid Depth	150 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

13.8 Scan Resolution 5GHz to 6GHz

Scan Resolution 5GHz to 6GHz	
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°
Area Scan Spatial Resolution $\Delta X, \Delta Y$	10 mm
Zoom Scan Spatial Resolution $\Delta X, \Delta Y$	4 mm
Zoom Scan Spatial Resolution ΔZ (Uniform Grid)	2 mm
Zoom Scan Volume X, Y, Z	22 mm
Phantom	ELI
Fluid Depth	100 ± 5 mm
An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.	
A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR	

14.0 MEASUREMENT UNCERTAINTIES

Table 14.0 Measurement Uncertainty

UNCERTAINTY BUDGET FOR DEVICE EVALUATION (IEEE 1528-2013 Table 9)									
Uncertainty Component	IEEE 1528 Section	Uncertainty Value ±%	Probability Distribution	Divisor	ci 1g	ci 10g	Uncertainty Value ±% (1g)	Uncertainty Value ±% (10g)	V _i or V _{eff}
Measurement System									
Probe Calibration*	E.2.1	6.6	Normal	1	1	1	6.60	6.60	∞
Axial Isotropy*	E.2.2	4.7	Rectangular	1.732050808	0.7	0.7	1.9	1.9	∞
Hemispherical Isotropy*	E.2.2	9.6	Rectangular	1.732050808	0.7	0.7	3.9	3.9	∞
Boundary Effect*	E.2.3	8.3	Rectangular	1.732050808	1	1	4.8	4.8	∞
Linearity*	E.2.4	4.7	Rectangular	1.732050808	1	1	2.7	2.7	∞
System Detection Limits*	E.2.4	1.0	Rectangular	1.732050808	1	1	0.6	0.6	∞
Modulation Response	E.2.5	4.0	Rectangular	1.732050808	1	1	2.3	2.3	∞
Readout Electronics*	E.2.6	1.0	Normal	1	1	1	1.0	1.0	∞
Response Time*	E.2.7	0.8	Rectangular	1.732050808	1	1	0.5	0.5	∞
Integration Time*	E.2.8	1.4	Rectangular	1.732050808	1	1	0.8	0.8	∞
RF Ambient Conditions - Noise	E.6.1	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
RF Ambient Conditions - Reflection	E.6.1	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
Probe Positioner Mechanical Tolerance*	E.6.2	0.4	Rectangular	1.732050808	1	1	0.2	0.2	∞
Probe Positioning wrt Phantom Shell*	E.6.3	2.9	Rectangular	1.732050808	1	1	1.7	1.7	∞
Extrapolation, interpolation & integration algorithms for max. SAR evaluation*	E.5	3.9	Rectangular	1.732050808	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	0.3	Normal	1	1	1	0.3	0.3	5
Device Holder Uncertainty*	E.4.1	3.6	Normal	1	1	1	3.6	3.6	∞
SAR Drift Measurement**	E.2.9	0.0	Rectangular	1.732050808	1	1	0.0	0.0	∞
SAR Scaling***	E.6.5	2.0	Rectangular	1.732050808	1	1	1.2	1.2	∞
Phantom and Tissue Parameters									
Phantom Uncertainty*	E.3.1	4.0	Rectangular	1.732050808	1	1	2.3	2.3	∞
SAR Correction Uncertainty	E.3.2	1.2	Normal	1	1	0.84	1.2	1.0	∞
Liquid Conductivity (measurement)	E.3.3	6.8	Normal	1	0.78	0.71	5.3	4.8	10
Liquid Permittivity (measurement)	E.3.3	5.3	Normal	1	0.23	0.26	1.2	1.4	10
Liquid Conductivity (Temperature)	E.3.2	0.1	Rectangular	1.732050808	0.78	0.71	0.1	0.0	∞
Liquid Permittivity Temperature)	E.3.2	0.0	Rectangular	1.732050808	0.23	0.26	0.0	0.0	∞
Effective Degrees of Freedom⁽¹⁾								V_{eff} =	873.2
Combined Standard Uncertainty			RSS				12.59	12.40	
Expanded Uncertainty (95% Confidence Interval)			k=2				25.18	24.80	

(1) The Effective Degrees of Freedom is > 30 therefore a coverage factor of k=2 represents an approximate confidence level of 95%.

* Provided by SPEAG

Table 14.1 Calculation of Degrees of Freedom

Table 13.1	
Calculation of the Degrees and Effective Degrees of Freedom	
$v_i = n - 1$	$v_{\text{eff}} = \frac{u_c^4}{m \sum_{i=1} \frac{c_i^4 u_i^4}{v_i}}$

15.0 FLUID DIELECTRIC PARAMETERS

Table 15.0 Fluid Dielectric Parameters 150MHz BODY TSL

 Aprel Laboratory
 Test Result for UIM Dielectric Parameter
 Tue 29/Aug/2017 13:37:31
 Freq Frequency(GHz)
 FCC_eHFCC Bulletin 65 Supplement C (June 2001) Limits for Head Epsilon
 FCC_sHFCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma
 FCC_eB FCC Limits for Body Epsilon
 FCC_sB FCC Limits for Body Sigma
 Test_e Epsilon of UIM
 Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
0.1000	63.13	0.76	64.18	0.79
0.1100	62.89	0.77	62.94	0.78
0.1200	62.64	0.78	65.19	0.78
0.1300	62.39	0.78	63.70	0.78
0.1400	62.15	0.79	63.58	0.78
0.1500	61.90	0.80	63.29	0.82
0.1600	61.65	0.81	60.32	0.82
0.1700	61.41	0.82	63.10	0.79
0.1800	61.16	0.82	64.52	0.80
0.1900	60.91	0.83	61.34	0.79
0.2000	60.67	0.84	62.48	0.81

FLUID DIELECTRIC PARAMETERS							
Date:	29 Aug 2017	Fluid Temp:	24	Frequency:	150MHz	Tissue:	Body
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
100.0000	64.1800	0.7900	63.1300	0.76	1.66%	3.95%	
110.0000	62.9400	0.7800	62.8900	0.77	0.08%	1.30%	
120.0000	65.1900	0.7800	62.6400	0.78	4.07%	0.00%	
130.0000	63.7000	0.7800	62.3900	0.78	2.10%	0.00%	
136.0000	*	63.6280	62.2460	0.79	2.22%	-0.76%	
140.0000	63.5800	0.7800	62.1500	0.79	2.30%	-1.27%	
150.0000	63.2900	0.8200	61.9000	0.80	2.25%	2.50%	
156.8000	*	61.2704	61.7300	0.81	-0.74%	1.64%	
160.0000	60.3200	0.8200	61.6500	0.81	-2.16%	1.23%	
162.0000	*	60.8760	61.6020	0.81	-1.18%	0.25%	
170.0000	63.1000	0.7900	61.4100	0.82	2.75%	-3.66%	
180.0000	64.5200	0.8000	61.1600	0.82	5.49%	-2.44%	
190.0000	61.3400	0.7900	60.9100	0.83	0.71%	-4.82%	
200.0000	62.4800	0.8100	60.6700	0.84	2.98%	-3.57%	

*Channel Frequency Tested

Table 15.1 Fluid Dielectric Parameters 150MHz HEAD TSL

 Aprel Laboratory
 Test Result for UIM Dielectric Parameter
 Tue 05/Sep/2017 11:23:24
 Freq Frequency(GHz)
 FCC_eHFCC OET 65 Supplement C (June 2001) Limits for Head Epsilon
 FCC_sHFCC OET 65 Supplement C (June 2001) Limits for Head Sigma
 Test_e Epsilon of UIM
 Test_s Sigma of UIM

Freq	FCC_eHFCC_sH	Test_e	Test_s
0.1000	54.63	0.72	55.74
0.1100	54.17	0.73	56.78
0.1200	53.70	0.74	53.53
0.1300	53.23	0.75	51.31
0.1400	52.77	0.75	51.56
0.1500	52.30	0.76	49.84
0.1600	51.83	0.77	49.60
0.1700	51.37	0.77	51.97
0.1800	50.90	0.78	50.11
0.1900	50.43	0.79	48.69
0.2000	49.97	0.80	47.81

FLUID DIELECTRIC PARAMETERS							
Date:	5 Sep 2017	Fluid Temp:	22.8	Frequency:	150MHz	Tissue:	Head
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
100.0000	55.7400	0.7200	54.6300	0.72	2.03%	0.00%	
110.0000	56.7800	0.7500	54.1700	0.73	4.82%	2.74%	
120.0000	53.5300	0.7600	53.7000	0.74	-0.32%	2.70%	
130.0000	51.3100	0.7500	53.2300	0.75	-3.61%	0.00%	
136.0000	*	51.4600	52.9540	0.75	-2.82%	-0.80%	
140.0000	51.5600	0.7400	52.7700	0.75	-2.29%	-1.33%	
150.0000	49.8400	0.7700	52.3000	0.76	-4.70%	1.32%	
156.8000	*	49.6768	51.9804	0.77	-4.43%	2.19%	
160.0000	49.6000	0.7900	51.8300	0.77	-4.30%	2.60%	
162.0000	*	50.0740	51.7380	0.77	-3.22%	2.86%	
170.0000	51.9700	0.8000	51.3700	0.77	1.17%	3.90%	
180.0000	50.1100	0.7900	50.9000	0.78	-1.55%	1.28%	
190.0000	48.6900	0.7900	50.4300	0.79	-3.45%	0.00%	
200.0000	47.8100	0.8200	49.9700	0.80	-4.32%	2.50%	

*Channel Frequency Tested

Table 15.2 Fluid Dielectric Parameters 2450MHz BODY TSL

 Aprel Laboratory
 Test Result for UIM Dielectric Parameter
 Mon 11/Sep/2017 13:44:13
 Freq Frequency(GHz)
 FCC_eHFCC Bulletin 65 Supplement C (June 2001) Limits for Head Epsilon
 FCC_sHFCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma
 FCC_eBFCC Limits for Body Epsilon
 FCC_sBFCC Limits for Body Sigma
 Test_e Epsilon of UIM
 Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
2.3500	52.83	1.85	49.94	1.82
2.3600	52.82	1.86	50.13	1.86
2.3700	52.81	1.87	50.00	1.84
2.3800	52.79	1.88	49.83	1.86
2.3900	52.78	1.89	49.70	1.88
2.4000	52.77	1.90	49.82	1.89
2.4100	52.75	1.91	49.69	1.90
2.4200	52.74	1.92	49.59	1.92
2.4300	52.73	1.93	49.71	1.92
2.4400	52.71	1.94	49.34	1.98
2.4500	52.70	1.95	49.50	1.97
2.4600	52.69	1.96	49.47	2.00
2.4700	52.67	1.98	49.48	2.00
2.4800	52.66	1.99	49.54	1.98
2.4900	52.65	2.01	49.39	2.02
2.5000	52.64	2.02	49.25	2.04
2.5100	52.62	2.04	49.29	2.04
2.5200	52.61	2.05	49.35	2.07
2.5300	52.60	2.06	49.29	2.09
2.5400	52.59	2.08	49.31	2.10
2.5500	52.57	2.09	49.28	2.11

FLUID DIELECTRIC PARAMETERS

Date:	11 Sep 2017	Fluid Temp:	23.1	Frequency:	2450MHz	Tissue:	Body
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
2350.0000	49.9400	1.8200	52.8300	1.85	-5.47%	-1.62%	
2360.0000	50.1300	1.8600	52.8200	1.86	-5.09%	0.00%	
2370.0000	50.0000	1.8400	52.8100	1.87	-5.32%	-1.60%	
2380.0000	49.8300	1.8600	52.7900	1.88	-5.61%	-1.06%	
2390.0000	49.7000	1.8800	52.7800	1.89	-5.84%	-0.53%	
2400.0000	49.8200	1.8900	52.7700	1.90	-5.59%	-0.53%	
2410.0000	49.6900	1.9000	52.7500	1.91	-5.80%	-0.52%	
2420.0000	49.5900	1.9200	52.7400	1.92	-5.97%	0.00%	
2430.0000	49.7100	1.9200	52.7300	1.93	-5.73%	-0.52%	
2440.0000	49.3400	1.9800	52.7100	1.94	-6.39%	2.06%	
2450.0000	49.5000	1.9700	52.7000	1.95	-6.07%	1.03%	
2460.0000	49.4700	2.0000	52.6900	1.96	-6.11%	2.04%	
2470.0000	49.4800	2.0000	52.6700	1.98	-6.06%	1.01%	
2480.0000	49.5400	1.9800	52.6600	1.99	-5.92%	-0.50%	
2490.0000	49.3900	2.0200	52.6500	2.01	-6.19%	0.50%	
2500.0000	49.2500	2.0400	52.6400	2.02	-6.44%	0.99%	
2510.0000	49.2900	2.0400	52.6200	2.04	-6.33%	0.00%	
2520.0000	49.3500	2.0700	52.6100	2.05	-6.20%	0.98%	
2530.0000	49.2900	2.0900	52.6000	2.06	-6.29%	1.46%	
2540.0000	49.3100	2.1000	52.5900	2.08	-6.24%	0.96%	
2550.0000	49.2800	2.1100	52.5700	2.09	-6.26%	0.96%	

*Channel Frequency Tested

Table 15.3 Fluid Dielectric Parameters 5250MHz BODY TSL

 Aprel Laboratory
 Test Result for UIM Dielectric Parameter
 Wed 13/Sep/2017 14:13:43
 Freq Frequency(GHz)
 FCC_eH FCC Bulletin 65 Supplement C (June 2001) Limits for Head Epsilon
 FCC_sH FCC Bulletin 65 Supplement C (June 2001) Limits for Head Sigma
 FCC_eB FCC Limits for Body Epsilon
 FCC_sB FCC Limits for Body Sigma
 Test_e Epsilon of UIM
 Test_s Sigma of UIM

Freq	FCC_eB	FCC_sB	Test_e	Test_s
5.1500	49.08	5.24	48.11	5.64
5.1600	49.07	5.25	48.59	5.66
5.1700	49.06	5.26	48.33	5.72
5.1800	49.04	5.28	48.41	5.66
5.1900	49.03	5.29	48.14	5.73
5.2000	49.01	5.30	48.38	5.70
5.2100	49.00	5.31	48.03	5.72
5.2200	48.99	5.32	48.17	5.71
5.2300	48.97	5.33	48.41	5.71
5.2400	48.96	5.35	48.09	5.81
5.2500	48.95	5.36	48.06	5.73
5.2600	48.93	5.37	48.01	5.85
5.2700	48.92	5.38	48.16	5.85
5.2800	48.91	5.39	47.95	5.86
5.2900	48.89	5.40	48.01	5.92
5.3000	48.88	5.42	47.92	5.82
5.3100	48.87	5.43	47.91	5.94
5.3200	48.85	5.44	47.71	5.93
5.3300	48.84	5.45	47.66	5.91
5.3400	48.82	5.46	47.71	5.96
5.3500	48.81	5.47	47.95	5.94

FLUID DIELECTRIC PARAMETERS

Date:	13 Sep 2017	Fluid Temp:	23	Frequency:	5250MHz	Tissue:	Body
Freq (MHz)	Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
5150.0000	48.1100	5.6400	49.0800	5.24	-1.98%	7.63%	
5160.0000	48.5900	5.6600	49.0700	5.25	-0.98%	7.81%	
5170.0000	48.3300	5.7200	49.0600	5.26	-1.49%	8.75%	
5180.0000	48.4100	5.6600	49.0400	5.28	-1.28%	7.20%	
5190.0000	48.1400	5.7300	49.0300	5.29	-1.82%	8.32%	
5200.0000	48.3800	5.7000	49.0100	5.30	-1.29%	7.55%	
5210.0000	48.0300	5.7200	49.0000	5.31	-1.98%	7.72%	
5220.0000	48.1700	5.7100	48.9900	5.32	-1.67%	7.33%	
5230.0000	48.4100	5.7100	48.9700	5.33	-1.14%	7.13%	
5240.0000	48.0900	5.8100	48.9600	5.35	-1.78%	8.60%	
5250.0000	48.0600	5.7300	48.9500	5.36	-1.82%	6.90%	
5260.0000	48.0100	5.8500	48.9300	5.37	-1.88%	8.94%	
5270.0000	48.1600	5.8500	48.9200	5.38	-1.55%	8.74%	
5280.0000	47.9500	5.8600	48.9100	5.39	-1.96%	8.72%	
5290.0000	48.0100	5.9200	48.8900	5.40	-1.80%	9.63%	
5300.0000	47.9200	5.8200	48.8800	5.42	-1.96%	7.38%	
5310.0000	47.9100	5.9400	48.8700	5.43	-1.96%	9.39%	
5320.0000	47.7100	5.9300	48.8500	5.44	-2.33%	9.01%	
5330.0000	47.6600	5.9100	48.8400	5.45	-2.42%	8.44%	
5340.0000	47.7100	5.9600	48.8200	5.46	-2.27%	9.16%	
5350.0000	47.9500	5.9400	48.8100	5.47	-1.76%	8.59%	

*Channel Frequency Tested

16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.0 System Verification Results 150MHz BODY TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
29 Aug 2017		150	P/N		S/N
			CLA-150		4007
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	24.3	28	29%	1000	0
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
63.29	61.90	2.25%	0.82	0.80	2.50%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
4.22	4.08	3.43%	2.86	2.70	5.93%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
4.22	4.01	5.24%	2.86	2.65	7.92%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

Table 16.1 System Verification Results 150MHz HEAD TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
			P/N	S/N	
05 Sep 2017		150	CLA-150		4007
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Head	22.8	27	27%	1000	0
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
49.84	52.30	-4.70%	0.77	0.76	1.32%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
3.64	3.90	-6.67%	2.44	2.58	-5.43%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
3.64	3.87	-5.94%	2.44	2.56	-4.69%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

Table 16.2 System Verification Results 2450MHz BODY TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
12 Sep 2017		2450	P/N		S/N
			D2450V2		825
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	23.3	27	33%	250	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
49.50	52.70	-6.07%	1.97	1.95	1.03%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
12.40	13.00	-4.62%	5.64	6.05	-6.78%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
49.60	50.70	-2.17%	22.56	23.80	-5.21%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					


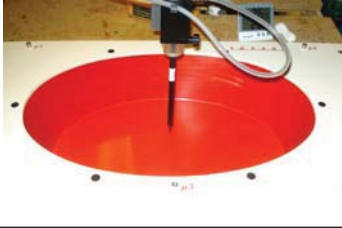

Table 16.3 System Verification Results 5250MHz BODY TSL

System Verification Test Results					
Date		Frequency (MHz)	Validation Source		
13 Sep 2017		5250	P/N		S/N
			D5GHzV2		1031
Fluid Type	Fluid Temp °C	Ambient Temp °C	Ambient Humidity (%)	Forward Power (mW)	Source Spacing (mm)
Body	23.0	28	32%	100	10
Fluid Parameters					
Permittivity			Conductivity		
Measured	Target	Deviation	Measured	Target	Deviation
48.06	48.95	-1.82%	5.73	5.36	6.90%
Measured SAR					
1 gram			10 gram		
Measured	Target	Deviation	Measured	Target	Deviation
7.10	7.26	-2.20%	1.96	2.04	-3.92%
Measured SAR Normalized to 1.0W					
1 gram			10 gram		
Normalized	Target	Deviation	Normalized	Target	Deviation
71.00	72.20	-1.66%	19.60	20.30	-3.45%
<p>Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224 and IEC 62209-1.</p> <p>The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.</p> <p>The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.</p> <p>The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.</p>					

17.0 MEASUREMENT SYSTEM SPECIFICATIONS

Table 17.0 Measurement System Specifications

Measurement System Specification	
Specifications	
Positioner	Stäubli Unimation Corp. Robot Model: RX60L
Repeatability	0.02 mm
No. of axis	6
Data Acquisition Electronic (DAE) System	
Cell Controller	
Processor	AMD Athlon XP 2400+
Clock Speed	2.0 GHz
Operating System	Windows XP Professional
Data Converter	
Features	Signal Amplifier, multiplexer, A/D converter, and control logic
Software	Measurement Software: DASYS
	Postprocessing Software: SEMCAD, V1.8 Build 186
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock
DASY Measurement Server	
Function	Real-time data evaluation for field measurements and surface detection
Hardware	PC/104 166MHz Pentium CPU; 32 MB chipdisk; 64 MB RAM
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface
E-Field Probe	
Model	EX3DV4
Serial No.	3600
Construction	Triangular core fiber optic detection system
Frequency	10 MHz to 6 GHz
Linearity	±0.2 dB (30 MHz to 3 GHz)
Phantom	
Type	ELI Elliptical Planar Phantom
Shell Material	Fiberglass
Thickness	2mm +/- .2mm
Volume	> 30 Liter

Measurement System Specification		
Probe Specification		
Construction:	Symmetrical design with triangular core; Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, glycol)	 <p>EX3DV4 E-Field Probe</p>
Calibration:	In air from 10 MHz to 2.5 GHz In head simulating tissue at frequencies of 900 MHz and 1.8 GHz (accuracy $\pm 8\%$)	
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)	
Directivity:	± 0.2 dB in head tissue (rotation around probe axis) ± 0.4 dB in head tissue (rotation normal to probe axis)	
Dynamic Range:	5 μ W/g to > 100 mW/g; Linearity: ± 0.2 dB	
Surface Detect:	± 0.2 mm repeatability in air and clear liquids over diffuse reflecting surfaces	
Dimensions:	Overall length: 330 mm; Tip length: 16 mm; Body diameter: 12 mm; Tip diameter: 6.8 mm Distance from probe tip to dipole centers: 2.7 mm	
Application:	General dosimetry up to 3 GHz; Compliance tests of mobile phone	
Phantom Specification		
<p>The SAM V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEEE 1528-2013, IEC 62209-1 and IEC 62209-2.</p>		 <p>ELI Phantom</p>
Device Positioner Specification		
<p>The DASY device positioner has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections.</p>		 <p>Device Positioner</p>

18.0 TEST EQUIPMENT LIST

Table 18.0 Equipment List and Calibration

Test Equipment List				
DESCRIPTION	ASSET NO.	SERIAL NO.	DATE CALIBRATED	CALIBRATION INTERVAL
Schmid & Partner DASY System	-	-	-	-
-DASY Measurement Server	158	1078	CNR	CNR
-Robot	46	599396-01	CNR	CNR
-DAE4	19	353	24-Apr-17	Annual
-EX3DV4 E-Field Probe	213	3600	27-Apr-17	Annual
-CLA150 Validation Source	251	4007	27-Apr-17	Triennial
-D835V2 Validation Dipole	217	4D075	23-Apr-15	Triennial
-D450V3 Validation Dipole	221	1068	21-Apr-15	Triennial
-D2450V2 Validation Dipole	219	825	23-Apr-15	Triennial
-D5GHzV2 Validation Dipole	126	1031	20-Apr-15	Triennial
ELI Phantom	247	-	CNR	CNR
HP 85070C Dielectric Probe Kit	33	none	CNR	CNR
Gigatronics 8652A Power Meter	110	1835801	29-Feb-16	Triennial
Gigatronics 80701A Power Sensor	248	1833687	29-Feb-16	Triennial
HP 8753ET Network Analyzer	134	US39170292	22-Oct-14	Triennial
Rohde & Schwarz SMR20 Signal Generator	6	100104	29-May-17	Triennial
Amplifier Research 5S1G4 Power Amplifier	106	26235	CNR	CNR

CNR = Calibration Not Required

19.0 FLUID COMPOSITION

Table 19.1 Fluid Composition 150MHz HEAD TSL

150		150MHz Head		
Tissue Simulating Liquid (TSL) Composition				
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
38.35	55.5	5.15	0.9	0.1

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Perservative

Table 19.2 Fluid Composition 150MHz BODY TSL

150		150MHz Body		
Tissue Simulating Liquid (TSL) Composition				
Component by Percent Weight				
Water	Sugar	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
46.6	49.7	2.6	1.0	0.1

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Perservative

Table 19.3 Fluid Composition 2450MHz BODY TSL

2450		2450MHz Body		
Tissue Simulating Liquid (TSL) Composition				
Component by Percent Weight				
Water	Glycol	Salt ⁽¹⁾	HEC ⁽²⁾	Bacteriacide ⁽³⁾
69.98	30.0	0.02	0.0	0.0

(1) Non-Iodinized

(2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g

(3) Dow Chemical Dowicil 75 Antimicrobial Perservative

Table 19.4 Fluid Composition 5250MHz BODY TSL

This is a proprietary composition by SPEAG.