



TEST REPORT

EUT Description WLAN and BT, 2x2 PCle M.2 1216 adapter card

Brand Name Intel® Wi-Fi 6 AX203

Model Name AX203D2W

FCC ID PD9AX203D2

Date of Test Start/End 2022-08-28 / 2022-08-29

Features 802.11ax, Dual Band, 2x2 Wi-Fi + Bluetooth® 5.2

(see section 5)

Description Platform: Engineering sample + PIFA antenna

Applicant Intel Mobile Communications

Address 100 Center Point Circle, Suite 200 / Columbia, SC 29210 / United States

Contact Person Steven Hackett

Telephone/Fax/ Email steven.c.hackett@intel.com

Reference Standards FCC 47 CFR Part §2.1093

(see section 1)

RF Exposure Environment Portable devices - General population/uncontrolled exposure

Exposure Conditions Body worn

SAR Result SAR Limit

Maximum SAR Result & Limit 0.73 W/kg (1g) 1.6 W/kg (1g)

Min. test separation distance 30mm to phantom

Test Report identification 210209-01. TR53

Rev. 00

Revision Control This test report revision replaces any previous test report revision

(see section 8)

The test results relate only to the samples tested.

Reference to accreditation shall be used only by full reproduction of test report.

Issued by Reviewed by

Akimu DIHISSOU (SAR Test Engineer)

Adel LOUNES (SAR Test Lead Engineer)

Intel Corporation S.A.S – WRF Lab
425 rue de Goa – Le Cargo B6 - 06600 Antibes, France
Tel. +33493001400 / Fax +33493001401



Table of Contents

	ards, reference documents and applicable test methods					
2. Gener	al conditions, competences and guarantees	4				
3. Enviro	onmental Conditions	5				
4. Test s	Test samples5					
5. EUT F	eatures	6				
	rks and comments					
	/erdicts summary					
	nent Revision History					
Annex A.	Test & System Description					
	DEFINITION					
	AG SAR MEASUREMENT SYSTEM					
	SAR Measurement Setup					
	F-Field Measurement Probe					
	SAM Phantom					
	Flat Phantom					
	Device Positioner					
	EVALUATION					
	EM AND LIQUID CHECK					
	System Check					
	iquid Check					
	EQUIPMENT LIST					
	Tissue Simulant Liquid					
	SUREMENT UNCERTAINTY EVALUATION					
	XPOSURE LIMITS					
Annex B.	Test Results					
-	CONDITIONS					
	Fest SAR Test positions relative to the phantom					
	est signal, Output power and Test Frequencies Fivaluation Exclusion and Test Reductions					
	DUCTED POWER MEASUREMENTS					
	VLAN 5GHz (U-NII)					
	JE PARAMETERS MEASUREMENT					
	EM CHECK MEASUREMENTS					
	TEST RESULTS					
	02.11a/n/ac/ax – 5.8 GHz – U-NII-4					
	SAR Measurement Variability					
	Simultaneous Transmission SAR Evaluation					
Annex C.	Test System Plots					
Annex D.	TSL Dielectric Parameters					
D.1 Bod	7 5700MHz-5900MHz					
Annex E.	Calibration Certificates					
Annex F.	Photographs	34				
F.1 TEST	SAMPLE	34				
F.2 TEST	POSITIONS	35				
F.3 ANTE	NNA HOST PLATFORM LOCATION AND ADJACENT EDGE POSITIONS RELATIVE TO THE BODY	36				



Test Report N° 210209-01. TR53

4 PHANTOM LIQUID LEVEL DURING MEASUREMENTS	3	37
--	---	----

FCC

1. Standards, reference documents and applicable test methods

FCC Title 47 CFR Part §2.1093 – Radiofrequency radiation exposure evaluation: portable devices. 2019-10-01 Edition

FCC OET KDB 447498 D04 v01 – RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices.

FCC OET KDB 616217 D04 v01r02 – SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers.

FCC OET KDB 865664 D01 v01r04 - SAR Measurement Requirements for 100 MHz to 6 GHz.

FCC OET KDB 865664 D02 v01r02 – RF Exposure Compliance Reporting and Documentation Considerations. IEEE Std 1528-2013 – IEEE Recommended Practice Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communication Devices: Measurement Techniques...

2. General conditions, competences and guarantees

- ✓ Tests performed under FCC standards identified in section 1 are covered by A2LA accreditation.
- ✓ Intel Corporation SAS Wireless RF Lab (Intel WRF Lab) is an ISO/IEC 17025:2017 laboratory accredited by the American Association for Laboratory Accreditation (A2LA) with the certificate number 3478.01.
- ✓ Intel Corporation SAS Wireless RF Lab (Intel WRF Lab) is an Accredited Test Firm recognized by the FCC, with Designation Number FR0011.
- ✓ Intel WRF Lab only provides testing services and is committed to providing reliable, unbiased test results and interpretations.
- ✓ Intel WRF Lab is liable to the client for the maintenance of the confidentiality of all information related to the item under test and the results of the test.
- ✓ Intel WRF Lab has developed calibration and proficiency programs for its measurement equipment to ensure correlated and reliable results to its customers.
- ✓ This report is only referred to the item that has undergone the test.
- ✓ This report does not imply an approval of the product by the Certification Bodies or competent Authorities.



3. Environmental Conditions

✓ At the site where the measurements were performed the following limits were not exceeded during the tests:

Temperature	21.2°C ± 2°C
Humidity	42.2% ± 10%
Liquid Temperature	20.0°C ± 2°C

4. Test samples

Sample	Control #	Description	Model	Serial #	Date of receipt	Note
	200928-02.S05	WLAN and BT, 2x2 PCIe M.2 1216 adapter card	AX203D2W	WFM: 90CCDF735FB9	2020-10-22	
	180000-01.S02	Socket adapter	-	-	2017-08-07	
#01	170509-02.S01	JfP1 Extender	PCB00589	5892016-149	2020-08-27	n/a
	170000-01.S18	Laptop	DELL Latitude E5470	4L1BVF2	2019-05-23	
	200611-03. S22	Reference Antenna	WRF-BR-PIFA- V3.2	-	2020-07-20	



5. EUT Features

The herein information is provided by the customer

Intel WRF Lab declines any responsibility with respect to the identified information provided by the customer and that may affect the validity of results.

Brand Name	Intel® Wi-Fi 6 AX203		
Model Name	AX203D2W		
Software Version	99.3500.51.0-01720		
Driver Version	WLAN 99.0.58.2		
Prototype / Production	Production		
Host Identification	Engineering sample		
	802.11b/g/n/ax 2.4GHz (2400.0 – 2483.5 MHz) 802.11a/n/ac/ax 5.2GHz (5150.0 – 5250.0 MHz) 5.3GHz (5250.0 – 5350.0 MHz)		
Supported Radios		5.6GHz (5470.0 – 5.8GHz (5725.0 –	
	802.11ax	6GHz (5925.0 - 71	125.0MHz)
	Bluetooth	2.4GHz (2400.0 –	2483.5 MHz)
	Transmitter	Main/chain B/Chain 2	Aux/chain A/Chain 1
	Manufacturer	Intel	Intel
Antenna Information	Antenna type	PIFA	PIFA
7 unomia miormanon	Part number	WRF-BR-PIFA-V3.2	WRF-BR-PIFA-V3.2
	See Annex F for more det	tails on antennas location.	
Simultaneous Transmission Configurations	WLAN 2.4GHz Main + BT Aux WLAN 2.4GHz Main + WLAN 2.4GHz Aux WLAN 5GHz Main + BT Aux* WLAN 5GHz Main + WLAN 5GHz Aux* WLAN 5GHz Main + WLAN 5GHz Aux + BT Aux*		
	No WWAN transmitter is o	considered in this report	
Additional Information	5.60-5.65 GHz band (TDV	VR) is supported by the dev	ice
	Band gap is supported by	the device	

^{*}Only the selected configurations are shown as this report is specific to UNII-4 band

UNII-4 Supported Radios

orm + Supported Radios					
Mode	Duty Cycle	Modulation	Band	UL Freq Range (MHz)	Measured Max. Conducted Power (dBm)
802.11a/n/ac/ax	100%	BPSK QPSK 16QAM 64QAM 256QAM	5.8GHz	5815-5895	21.00

NM: Not Measured



Maximum Output pov	SISO	mode		
Equipment Class	Mode	BW (MHz)	Chain A (dBm)	Chain B (dBm)
	802.11a	20	19.50	19.50
	802.11n20	20	20.00	19.50
	802.11ax20	20	19.50	20.00
U-NII-4	802.11n40	40	21.00	21.00
	802.11ax40	40	21.00	21.00
	802.11ac80	80	19.75	19.50
	802.11ax80	80	19.50	20.00



6. Remarks and comments

- 1. This report is limited to UNII-4 band. For all other bands, DTS, UNII-1, UNII-2A, UNII-2C, UNII-3 and BT refer to the following report: 200928-02.TR07 FCC, WLAN Generic SKU, AX203D2W
- 2. Only the plots for the test positions with the highest measured SAR per band/mode are included in Annex C as required per FCC OET KDB 865664 D02, paragraph 2.3.8.

7. Test Verdicts summary

The statement of conformity to applicable standards in the table below are based on the measured values, without taking into account the measurement uncertainties.

Standard	Band	Highest Reported SAR (1g) (W/kg)	Verdict
802.11a/n/ac/ax	5.8GHz	0.73	Pass

P: Pass F: Fail

NM: Not Measured NA: Not Applicable

According to the FCC OET KDB 690783 D01, this is the summary of the values for the Grant Listing:

	Highest Reported SAR (1g) (W/kg)		
Evacuus Condition	Equipment Class		
Exposure Condition	DSS	U-NII	
Body Worn	0.02	0.73	
Simultaneous Tx	Sum-SAR:1.26	Sum-SAR: 1.26	

Considering the results of the performed test according to FCC 47CFR Part 2.1093 is IN COMPLIANCE with the requested specifications specified in Section1. Standards, reference documents and applicable test methods

8. Document Revision History

Revision #	Modified by	Revision Details
Rev. 00	A. Dihissou	Tests performed with WRF-BR-PIFA-V3.2 antenna



Annex A. Test & System Description

A.1 SAR Definition

Specific Absorption rate is defined as the time derivative of the incremental energy (dW) absorbed by (dissipated in) and incremental mass (dm) contained in a volume element (dV) of a given density (p).

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

SAR is expressed in units of watts per kilogram (W/kg). SAR can be related to the electric field at a point by

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

Where: $\sigma = \text{Conductivity of the tissue (S/m)}$

 ρ = Mass density of the tissue (kg/m3)

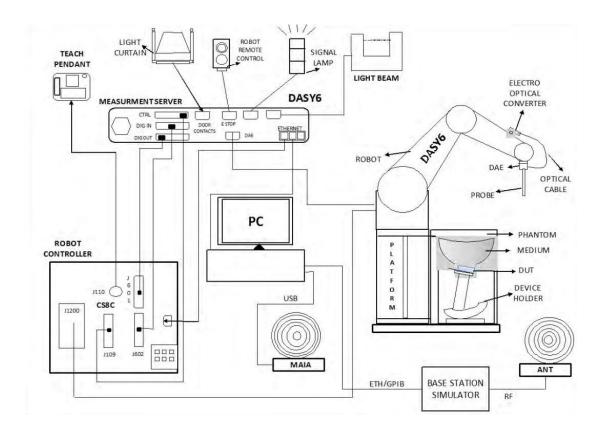
E = RMS electric field strength (V/m)



A.2 SPEAG SAR Measurement System

A.2.1 SAR Measurement Setup

The DASY6 system for performing compliance tests consists of the following items:



- ✓ A standard high precision 6-axis robot (Staübli TX/RX family) with controller, teach pendant and software. It includes an arm extension for accommodating the data acquisition electronics (DAE)
- ✓ An isotropic field probe optimized and calibrated for the targeted measurements.
- ✓ A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- ✓ The Electro-optical Converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. The EOC signal is transmitted to the measurement server.
- ✓ The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movements interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- ✓ A computer running Win7 professional operating system and the DASY6 software.
- ✓ Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- ✓ The phantom, the device holder and other accessories according to the targeted measurement.
- ✓ MAIA is a hardware interface (Antenna) used to evaluate the modulation and audio interference characteristics of RF signals.
- ✓ ANT is an ultra-wideband antenna for use with the base station simulators over 698 MHz to 6GHz.
- ✓ The base station simulator is an equipment used for SAR cellular tests in order to emulate the cellular signals characteristics and behavior between a regular base station and the equipment under test.
- ✓ Tissue simulating liquid.
- ✓ System Validation dipoles.
- ✓ Network emulator or RF test tool



A.2.2 E-Field Measurement Probe

The probe is constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probe has built-in shielding against static charges and is contained within a PEEK cylindrical enclosure material at the tip.



The probe's characteristics are:

Frequency Range	30MHz – 6GHz
Length	337 mm
Probe tip external diameter	2.5 mm
Typical distance between dipoles and the probe tip	1 mm
Axial Isotropy (in human-equivalent liquids)	±0.3 dB
Hemispherical Isotropy (in human-equivalent liquids)	±0.5 dB
Linearity	±0.2 dB
Maximum operating SAR	100 W/kg
Lower SAR detection threshold	0.001 W/kg

A.2.3 SAM 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.

The phantom's characteristics are:

Material	Vinylester, glass fiber reinforced (VE-GF)
Shell thickness	2 mm ± 0.2 mm
Shell thickness at ERP	6 ± 0.2 mm
Filling volume	25 Liters
Dimensions	Length: 1000mm / Width: 500mm





A.2.4 Flat Phantom

Phantom 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.

The phantom's characteristics are:

Material	Vinylester, glass fiber reinforced (VE-GF)
Shell thickness	2 mm ± 0.2 mm
Filling volume	30 Liters approx.
Dimensions	Major axis: 600mm / Minor axis: 400mm





A.2.5 Device Positioner

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 5 mm distance, a positioning uncertainty of 0.5 mm would produce a SAR uncertainty of 20%. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.





The DASY device holder is designed to cope with the different positions given in the standard. It has two scales for device rotation (with respect to the body axis) and device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity ϵ =3 and loss tangent δ =0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

A simple but effective and easy-to-use extension for the Mounting Device; facilitates testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.); 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, ELI and other Flat Phantoms.

A.3 Data Evaluation

Power Reference measurement

The robot measures the E field in a specified reference position that can be either the selected section's grid reference point or a user point in this section at 4mm of the inner surface of the phantom, 2mm for frequencies above 3GHz.

Area Scan

Measurement procedures for evaluating SAR from wireless handsets typically start with a coarse measurement grid to determine the approximate location of the local peak SAR values. This is known as the area-scan procedure. The SAR distribution is scanned along the inside surface of one side of the phantom head, at least for an area larger than the projection of the handset and antenna. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (with variation less than ± 1 mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient accuracy. The angle between the probe axis and the surface normal line is recommended but not required to be less than 30°. If this angle is larger than 30° and the closest point on the probe-tip housing to the phantom surface is closer than a probe diameter, the boundary effect may become larger and polarization dependent. This additional uncertainty needs to be analyzed and accounted for. To achieve this, modified test procedures and additional uncertainty analyses not described in this recommended practice may be required. The measurement and interpolation point spacing should be chosen such as to allow identification of the local peak locations to within one-half of the linear dimension of a side of the zoom-scan volume. Because a local peak having specific amplitude and steep gradients may produce a lower peak spatial-average SAR compared to peaks with slightly lower amplitude and less steep gradients, it is necessary to evaluate these other peaks as well. However, since the spatial gradients of local SAR peaks are a function of the wavelength inside the tissue-equivalent liquid and the incident magnetic field strength, it is not necessary to evaluate local peaks that are less than 2 dB or more below the global maximum peak. Two-dimensional spline algorithms (Brishoual et al. 2001; Press et al., 1996) are typically used to determine the peaks and gradients within the scanned area. If a peak is found at a distance from the scan border of less than one-half the edge dimension of the desired 1 g or 10 g cube, the measurement area should be enlarged if possible.

Zoom Scan

To evaluate the peak spatial-average SAR values for 1 g or 10 g cubes, fine resolution volume scans, called zoom scans, are performed at the peak SAR locations identified during the area scan. The minimum zoom scan volume size should extend at least 1.5 times the edge dimension of a 1 g cube in all directions from the center of the scan volume, for both 1 g and 10 g peak spatial-average SAR evaluations. Along the phantom curved surfaces, the front face of the volume facing the tissue/liquid interface conforms to the curved boundary, to ensure that all SAR peaks are captured. The back face should be equally distorted to maintain the correct averaging mass. The flatness and orientation of the four side faces are unchanged from that of a cube whose orientation is within ± 30° of the line normal to the phantom at the center of the cube face next to the phantom surface. The peak local SAR locations that were determined in the area scan (interpolated values) should be used for the centers of the zoom scans. If a scan volume cannot be centered due to proximity of a phantom shape feature, the probe should be tilted to allow scan volume enlargement. If probe tilt is not feasible, the zoom-scan origin may be shifted, but not by more than half of the 1 g or 10 g cube edge dimension.

After the zoom-scan measurement, extrapolations from the closest measured points to the surface, for example along lines parallel to the zoom-scan centerline, and interpolations to a finer resolution between all measured and extrapolated points are performed. Extrapolation algorithm considerations are described in 6.5.3, and 3-D spline methods (Brishoual et al., 2001; Kreyszig, 1983; Press et al., 1996) can be used for interpolation. The peak spatial-average SAR is finally determined by a numerical averaging of the local SAR values in the interpolation grid, using for example a trapezoidal algorithm for the integration (averaging).

In some areas of the phantom, such as the jaw and upper head regions, the angle of the probe with respect to the line normal to the surface may be relatively large, e.g., greater than \pm 30°, which could increase the boundary effect error to a larger level. In these cases, during the zoom scan a change in the orientation of the probe, the phantom, or both is recommended but not required for the duration of the zoom scan, so that the angle between the probe axis and the line normal to the surface is within 30° for all measurement points.



Power Drift measurement

The robot re-measures the E-Field in the same reference location measured at the Power Reference. The drift measurement gives the field difference in dB from the first to the last reference reading. This allows a user to monitor the power drift of the device under test that must remain within a maximum variation of ±5%.

Post-processing

The procedure for spatial peak SAR evaluation has been implemented according to the IEEE1528 and IEC 62209-1/2 standards. It can be conducted for 1g and 10g.

The software allows evaluations that combine measured data and robot positions, such as:

- ✓ Maximum search
- ✓ Extrapolation
- ✓ Boundary correction
- ✓ Peak search for averaged SAR

Interpolation between the measured points is performed when the resolution of the grid is not fine enough to compute the average SAR over a given mass.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation.



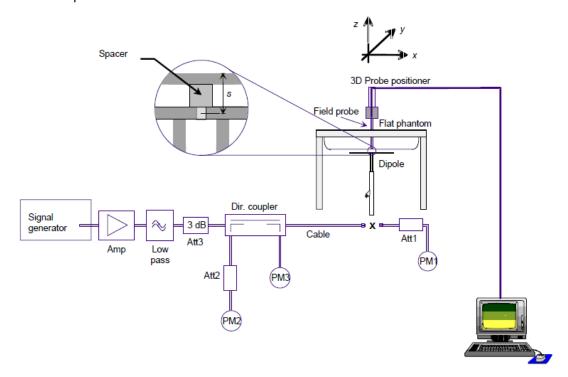
A.4 System and Liquid Check

A.4.1 System Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results.

The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components but indicates situations where the system uncertainty is exceeded due to drift or failure.

In the simplified setup for system check, the EUT is replaced by a calibrated dipole and the power source is replaced by a controlled continuous wave generated by a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the phantom at the correct distance.



The equipment setup is shown below:

- ✓ Signal Generator
- ✓ Amplifier
- ✓ Directional coupler
- ✓ Power meter
- ✓ Calibrated dipole

First, the power meter PM1 (including attenuator Att1) is connected to the cable to measure the forward power at the location of the connector (x) to the system check source. The signal generator is adjusted for the desired forward power at the connector as read by power meter PM1 after attenuation Att1 and also as coupled through Att2 to PM2. After connecting the cable to the source, the signal generator is readjusted for the same reading at power meter PM2.

SAR results are normalized to a forward power of 1W to compare the values with the calibration reports results as described at IEEE/IEC62209 1528 and IEEE 1528 standards.

A.4.2 Liquid Check

The dielectric parameters check is done prior to the use of the tissue simulating liquid. The verification is made by comparing the relative permittivity and conductivity to the values recommended by the applicable standards.

The liquid verification was performed using the following test setup:

- ✓ VNA (Vector Network Analyzer)
- ✓ Open-Short-Load calibration kit
- ✓ RF Cable
- ✓ Open-Ended Coaxial probe
- ✓ DAK software tool
- ✓ SAR Liquid
- ✓ De-ionized water
- √ Thermometer

These are the target dielectric properties of the tissue-equivalent liquid material as defined in FCC OET KDB 865664 D01.

Frequency	Body SAR				
(MHz)	ε _r (F/m)	σ (S/m)			
150	61.9	0.80			
300	58.2	0.92			
450	56.7	0.94			
835	55.2	0.97			
900	55.0	1.05			
1450	54.0	1.30			
1800-2000	53.3	1.52			
2450	52.7	1.95			
3000	52.0	2.73			
5800	48.2	6.00			

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

The measurement system implement a SAR error compensation algorithm as documented in IEEE Std 1528-2013 (equivalent to draft standard IEEE P1528-2011) to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters (applied to only scale up the measured SAR, and not downward) so, according to FCC OET KDB 865664 D01, the tolerance for ϵ_r and σ may be relaxed to \pm 10%.



A.5 Test Equipment List

SAR system #1

ID#	Device	Type/Model	Serial Number	Manufacturer	Cal. Date	Cal. Due Date
001-000	6-Axis Robot	TX60 Lspeag	F12/5MZ3A1/A/01	STAÜBLI	NA	NA
001-002	Light Beam Unit	LB5/80	N/A	Di-soric	NA	NA
001-003	Laptop Holder	N/A	N/A	SPEAG	NA	NA
001-004	Robot Controller	CS8C	F12/5MZ3A1/C/01	STAÜBLI	NA	NA
001-005	Electro Optical Converter	EOC60	1076	SPEAG	NA	NA
003-007	Dosimetric E- Field probe 750- 5800MHz	EX3DV4	7465	SPEAG	2022-07-18	2023-07-18
001-006	Dosimetric E- Field probe 750- 5800MHz	EX3DV4	7325	SPEAG	2021-12-15	2022-12-15
003-016	Data Acquisition Electronics	DAEip	1705	SPEAG	2022-04-28	2023-04-28
001-008	Oval Flat Phantom	ELI V8.0	2059	SPEAG	NA	NA
001-009	Measurement Software	DASY6 v6.12	9-618AE2F1	SPEAG	NA	NA
001-010	MAIA Antenna	MAIA	1255	SPEAG	NA	NA

Shared equipment

ID#	Device	Type/Model	Serial Number	Manufacturer	Cal. Date	Cal. Due Date
123-000	USB Power Sensor	NRP-Z81	102278	R&S	2021-04-13	2023-04-13
124-000	USB Power Sensor	NRP-Z81	102279	R&S	2021-04-13	2023-04-13
099-000	Liquid measurement SW	DAK-3.5 V2.6.0.5	9-2687B491	SPEAG	NA	NA
369-000	Dielectric Probe Kit	DAK-3.5	1309	SPEAG	2021-03-10	2023-03-10
077-000	Coupler	CD0.5-8-20-30	1251-002	Amd-group	2022-02-01	2022-09-01
078-000	RF Cable	ST- 18/SMAm/SMAm/48	-	Huber & Suhner	2022-02-01	2022-09-01
079-000	RF Cable	ST- 18/SMAm/SMAm/48	-	Huber & Suhner	2022-02-01	2022-09-01
126-000	Vector Signal Generator	ESG E4438C	MY45092885	Agilent	2021-05-27	2023-05-27
327-000	Temp & Humidity Logger	RA32E-TH1-RAS	RA32-F0DED9	AVTECH	2021-03-09	2023-03-09
089-000	Vector Reflectometer R140	PLANAR R140	0190616	R&S	2021-09-02	2023-09-02
070-000	2.45GHz System Validation Dipole	D2450V2	0937	SPEAG	2022-05-19	2024-05-19
084-000	5GHz System Validation Dipole	D5GHzv2	1259	SPEAG	2022-03-17	2024-03-17

A.5.1 Tissue Simulant Liquid

TSL	Manufacturer / Model	Freq Range (MHz)	Main Ingredients
Body WideBand System #1	SPEAG MBBL600-6000V6 Batch 180206-04	600-6000	Ethanediol, Sodium petroleum sulfonate, Hexylene Glycol / 2-Methyl-pentane-2.4- diol, Alkoxylated alcohol



A.6 Measurement Uncertainty Evaluation

The system uncertainty evaluation is shown in the table below with a coverage factor of k = 2 to indicate a 95% level of confidence:

	SPEAG DASY6 Uncertainty Budget According to IEC/IEEE 62209-1528 (4 MHz - 6 GHz)							
	including IEEE 152							
Symbol	Error Description	Uncert. Value	Prob Dist.	Div.	(ci) 1g	(ci) 10g	Std Unc. (1g)	Std Unc. (10g)
Measurer	Measurement System Errors							
CF	Probe Calibration	±14.0 %	N	2	1	1	±7.0 %	±7.0 %
CF drif t	Probe Calibration Drift	±1.0 %	N	1	1	1	±1.0 %	±1.0 %
LIN	Probe Linearity	±4.7 %	R	√3	1	1	±2.7 %	±2.7 %
BBS	Broadband Signal	±3.0 %	N	2	1	1	±1.5 %	±1.5 %
ISO	Axial Isotropy	±4.7 %	R	√3	0.5	0.5	±1.4 %	±1.4 %
ISO	Hemispherical Isotropy	±9.6 %	R	√3	0.5	0.5	±2.8 %	±2.8 %
DAE	Data Acquisition	±0.3 %	N	1	1	1	±0.3 %	±0.3 %
AMB	RF Ambient	±1.8 %	N	1	1	1	±1.8 %	±1.8 %
Δsys	Probe Positioning	±0.2 %	N	1	0.33	0.33	±0.1 %	±0.1 %
DAT	Data Processing	±2.3 %	N	1	1	1	±2.3 %	±2.3 %
Phantom	and Device Errors							
LIQ(σ)	Conductivity (meas.)DAK	±2.5 %	N	1	0.78	0.71	±2.0 %	±1.8 %
LIQ(Tσ)	Conductivity (temp.)BB	±3.4 %	R	√3	0.78	0.71	±1.5 %	±1.4 %
EPS	Phantom Permittivity	±14.0 %	R	√3	0.25	0.25	±2.0 %	±2.0 %
DAS	Distance DUT - TSL	±2.0 %	N	1	2	2	±4.0 %	±4.0 %
Н	Device Holder	±3.6 %	N	1	1	1	±3.6 %	±3.6 %
MOD	DUT Modulation _m	±2.4 %	R	√3	1	1	±1.4 %	±1.4 %
TAS	Time-average SAR	±2.6 %	R	√3	1	1	±1.5 %	±1.5 %
RF drif t	DUT drift	±5.0 %	N	1	1	1	±2.9 %	±2.9 %
Correctio	on to the SAR results							
C(ε, σ)	Deviation to Target	±1.9 %	N	1	1	0.84	±1.9 %	±1.6 %
Combi	ined Std. Uncertainty						±11.5 %	±11.4 %
Expand	led STD Uncertainty						±23.1 %	±22.9 %



A.7 RF Exposure Limits

SAR assessments have been made in line with the requirements of FCC 47CFR Part 2.1093 and ISED RSS 102 issue 5 on the limitation of exposure of the general population / uncontrolled exposure for portable devices.

Exposure Type	General Population / Uncontrolled Environment
Peak spatial-average SAR (averaged over any 1 gram of tissue)	1.6 W/kg
Whole body average SAR	0.08 W/kg
Peak spatial-average SAR (extremities) (averaged over any 10 grams of tissue)	4.0 W/kg



Annex B. Test Results

The herein test results were performed by:

Test case measurement	Test Personnel
Conducted measurement	T. Mathieu
SAR measurement	A.Dihissou

B.1 Test Conditions

B.1.1 Test SAR Test positions relative to the phantom

The device under test was an Intel® Wi-Fi 6 AX203 card inside an extender host platform (Engineering sample) using a set of PIFA antennas. The card was operated utilizing proprietary software (DRTU version 99.3500.51.0-01720) and each channel was measured using a broadband power meter to determine the maximum average power.

The SAR Test Exclusion Threshold in FCC OET KDB 447498 D04 can be applied to determine SAR test exclusion for adjacent edge configurations. All sides (except back face) of the antenna were tested in both chains for SAR compliance with the antenna placed at 30mm beneath the phantom. The adjacent edges of the antenna were positioned perpendicular to the phantom

Considering the antenna location diagrams in Annex F and the test exclusions described before, the surfaces/edges to be measured for each antenna are:

Antenna	Chain A	Chain B
	Front face	Front face
	Top edge	Top edge
Position	Bottom edge	Bottom edge
	Left edge	Left edge
	Right edge	Right edge

See B. 1.3(i) for a more detailed list of the applied reductions.

See F.2 Test positions section for more information on the tested positions

B.1.2 Test signal, Output power and Test Frequencies

For 802.11 transmission modes the device was put into operation by using an own control software to program the test mode required to select the continuous transmission with 100% duty cycle.

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

B.1.3 Evaluation Exclusion and Test Reductions

(i) SAR evaluation exclusion

The SAR Test Exclusion Threshold in FCC OET KDB 447498 D04 v01 can be applied to determine SAR test exclusion for adjacent edge configurations. For 100MHz to 6GHz and test separation distances ≤50mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following formula:

[(max. power of channel, including tune – up tolerance, mW)/(min. test separation distance, mm)]
$$\cdot \left[\sqrt{f_{(GHz)}} \right]$$
 (1) $\leq 3.0 \ for \ 1g \ SAR, \ and \ \leq 7.5 \ for \ 10g \ extremity \ SAR$

Where:

f(GHz) is the RF channel transmit frequency in GHz Power and distance are rounded to the nearest mW and mm before calculation The result is rounded to one decimal place for comparison The values 3.0 and 7.5 are referred to as numeric thresholds

The test exclusions are applicable only when the minimum test separation distance is \leq 50 mm, and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

For test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined using the following formulas:

$$\langle \left(Power \ allowed \ at \ numeric \ threshold \ for \ 50 \ mm \ in \ (1) \right) + (test \ separation \ distance - 50 \ mm) \cdot (f_{MHz}/150) \rangle mW,$$
 (2)
$$\langle \left(Power \ allowed \ at \ numeric \ threshold \ for \ 50 \ mm \ in \ (1) \right) + (test \ separation \ distance - 50 \ mm) \cdot 10) \rangle mW,$$
 for $1500MHz \ and \ \leq 6GHz$ (3)

LANI	Rand	Output	power Top		Right	Front	Left	Bottom
LAN Antenna	Band Name	dBm	mW	Edge	ıt Edge	nt Face	Edge	m Edge
WLAN Aux	UNII-4	21	125.9	<50	<50	<50	<50	<50
WLAN Main	UNII-4	21	125.9	<50	<50	<50	<50	<50

Top Edge	Right Edge	Left Edge	Front Face	Bottom Edge
Т	Т	Т	Т	Η
Т	Т	Т	Т	Т

See Annex F for a more detailed explanation of the separation distance related to the platform.

T: Tested position

R: Reduced



(ii) General SAR test reduction

According to FCC OET KDB 447498 D04, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- \bullet ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

WLAN SAR Test reduction

Transmission Mode	SAR test exclusion/reduction
DSSS	 According to FCC OET KDB 248227 D01, SAR is measured for 2.4 GHz 802.11b, SAR test reduction is determined according to the following: When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration. When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel.
	According to FCC OET KDB 248227 D01, SAR is not required for 2.4 GHz OFDM conditions when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is \leq 1.2 W/kg.
	According to FCC OET KDB 248227 D01, 802.11a/g/n/ac modes have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n.
OFDM	According to FCC OET KDB 248227 D01, an <i>initial test configuration</i> is determined for OFDM and DSSS transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. SAR test reduction for subsequent highest output test channels is determined according to reported SAR of the initial test configuration.
	The <u>initial test configuration</u> for 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures.
	According to FCC OET KDB 248227 D01, when the reported SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is ≤ 1.2 W/kg or all required channels are tested.

B.2 Conducted Power Measurements

B.2.1 WLAN 5GHz (U-NII)

(i) 5.8 (U-NII-4)

				Chain A		Chain B			
Band	Mode	Data Rate	Ch#	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	SAR Test?
			169	5845		19.50		19.50	
	802.11a	6Mbps	173	5865		19.50		19.50	
			177	5885		19.50		19.50	
		HT0	169	5845		20.00	NR ^{1,3}	19.50	No ^{4,6}
			173	5865	NR ^{1,3}	20.00		19.50	
			177	5885		20.00		19.50	
_			169	5845		19.50		20.00	
U-NII-4	802.11ax20	HE0	173	5865		19.50		20.00	
4			177	5885		19.50		20.00	
	802.11n40	HT0	167	5835	21.00	21.00	21.00	21.00	Yes
	002.111140	піо	175	5875	20.50	21.20	20.92	21.00	No
	902 11ov 10	ЦΕО	167	5835		21.00		21.00	
	802.11ax40 HE0	пЕО	175	5875	NR ^{1,3}	21.00	NR ^{1,3}	21.00	No ^{4,6}
	802.11ac80	VHT0	171	5855	INK',º	19.75		19.50	
	802.11ax80	HE0	171	5855		19.50		20.00	

Initial test configuration

- 1. NR: Not Required
- When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest reported SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band (see §Error! Reference s ource not found. in this document).
- 3. Additional conducted power measurement is required when reported SAR is > 1.2W/kg. In case the subsequent test configuration and the channel bandwidth is smaller than the initial test configuration, all channels that overlap with the larger channel bandwidth in the initial configuration should be tested.
- 4. The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple transmission modes (802.11a/g/n/ac/ax) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, lowest order 802.11 mode is selected (i.e. a, g, n, ac then ax)
- 5. When the reported SAR of the initial test configuration is > 0.8W/kg, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is =1.2W/kg or all required channels are tested.
- 6. When the highest reported SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure requirements, is adjusted by the ratio of the subsequent test configuration to the initial test configuration specified maximum output power and the adjusted SAR is ≤1.2 W/Kg, SAR is not required for that subsequent test configuration
- SAR for subsequent highest measured maximum output power channels in the <u>subsequent test configuration</u> is required only when the reported SAR of the preceding higher maximum output power channel(s) in the <u>subsequent test configuration</u> is >1.2 W/Kg or until all required channels are tested.



B.3 Tissue Parameters Measurement

Body TSL

Freq. (MHz)	Target Parameters		Measured TSL Parameters		Devia	Date	
	ε' (F/m)	σ (S/m)	ε' (F/m)	σ (S/m)	ε'	σ	
5800	48.20	6.00	46.44	6.18	-3.65	3.00	2022-08-29

See Annex D for more details

B.4 System Check Measurements

Body Measurements

Frequency (MHz)	Average	Target SAR (W/Kg)	Measured SAR (W/Kg)	Forwarded Power (mW)	Deviation to target (%)	Limit (%)	Date
5800	1g	74.8	68.40	50	-8.56	±10	2022-08-29
3000	10g	20.2	20.80	50	2.97	±10	2022-00-29

See Annex C for more details.



B.5 SAR Test Results

B.5.1 802.11a/n/ac/ax - 5.8 GHz - U-NII-4

Ant.	Mode Data rate	BW (MHz)	Ch #	Freq (MHz)	Position	Correct. Factor (dB)	SAR 1g (W/kg)	Reported SAR 1g (W/kg)	Plot #
				167 5835	Front face	0.00	0.73	0.73	1
	802.11n				Top edge	0.00	0.21	0.21	
Aux	Aux HT0	40	167		Bottom edge	0.00	0.13	0.13	
					Left edge	0.00	0.30	0.31	
					Right edge	0.00	0.10	0.10	
					Front face	0.00	0.51	0.51	
	000 44:				Top edge	0.00	0.21	0.21	
Main	802.11n HT0	40	167	5835	Bottom edge	0.00	0.12	0.12	
					Left edge	0.00	0.24	0.24	
					Right edge	0.00	0.09	0.09	



B.5.2 SAR Measurement Variability

According to FCC OET KDB 865664, SAR Measurement variability is assessed when the maximum initial measured SAR is >=0.8 W/kg for a certain band/mode.

As all measured SAR results are below 0.8W/kg, therefore SAR variability is not required



B.5.3 Simultaneous Transmission SAR Evaluation

According to FCC OET KDB 447498 D04, when the sum of 1g SAR for all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit, SAR test exclusion applies to that simultaneous transmission configuration.

All the values stated in the table below are the worst case found for standalone measurement with disregard of the transmission mode or channel where the worst case was found

Antonno	Decition	Highest Reported SAR (1g) (W/Kg)			
Antenna	Position	WLAN 5GHz	Bluetooth*		
	Front face	0.51			
	Top edge	0.21			
Main	Bottom edge	0.12			
	Left edge	0.24			
	Right edge	0.09			
	Front face	0.73	0.02		
	Top edge	0.21	0.00		
Aux	Bottom edge	0.13	0.01		
	Left edge	0.31	0.02		
	Right edge	0.10	0.01		

^{*} For BT values refer to the following report: 200928-02.TR07 - FCC, WLAN Generic SKU, AX203D2W

Position	Simultaneous Tx A	ntenna Combination	Σ SAR 1g (W/kg)	Limit (W/kg)
	Aux	Main		
	WLAN 5GHz	WLAN 5GHz	1.24	
Front Face	WLAN 5GHz + BT	WLAN 5GHz	1.26	
	BT	WLAN 5GHz	0.53	
	WLAN 5GHz	WLAN 5GHz	0.42	
Top Edge	WLAN 5GHz + BT	WLAN 5GHz	0.42	
	BT	WLAN 5GHz	0.21	
	WLAN 5GHz	WLAN 5GHz	0.25	
Bottom Edge	WLAN 5GHz + BT	WLAN 5GHz	0.26	1.6
	BT	WLAN 5GHz	0.13	
	WLAN 5GHz	WLAN 5GHz	0.55	
Left Edge	WLAN 5GHz + BT	WLAN 5GHz	0.57	
	BT	WLAN 5GHz	0.14	
	WLAN 5GHz	WLAN 5GHz	0.19	
Right Edge	WLAN 5GHz + BT	WLAN 5GHz	0.20	7
	BT	WLAN 5GHz	0.10	

Considering the results described above and according to the simultaneous transmission SAR test exclusion considerations described in FCC OET KDB 447498 D04 interim, no SAR to Peak Location Separation Ratio is required.



Annex C. Test System Plots

1.	U-NII-4 - 802.11n40, CH167, Aux Antenna – Position Front Face	. 29
2.	System Check Body Liquid 5800MHz	. 30



1. U-NII-4 - 802.11n40, CH167, Aux Antenna - Position Front Face

Device under Test Properties

Model, Manufacturer	Dimensions [mm]	IMEI	DUT Type
AX203NGW	86.0 x 52.0 x 8.0	90CCDF735FB9	WLAN module + Reference antenna

Exposure Conditions

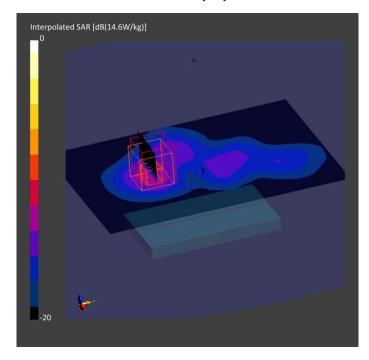
Phantom Section, TSL	Position, Test Distance [mm]	Band	Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat,	FRONT FACE,	Custom	CW,	5835,	4.0	6.23	46.3
MSL	30.00	Band	10425-AAC	167			

Hardware Setup

Phantom	TSL, Measured Date	Probe, Calibration Date	DAE, Calibration Date
ELI V8.0 (20deg probe tilt)	MBBL-600-6000, 2022-Aug-29	EX3DV4 - SN7325, 2021-12-15	DAE4 Sn1705, 2022-04-28

Scan Setup		
•	Area Scan	Zoom Scan
Grid Extents [mm]	120.0 x 160.0	22.0 x 22.0 x 22.0
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4
Sensor Surface	3.0	1.4
[mm]		
Graded Grid	No	Yes
Grading Ratio	n/a	1.4
MAIA	Confirmed by MAIA	Confirmed by MAIA
Surface Detection	VMS + 6p	VMS + 6p
Scan Method	Measured	Measured

Measurement Resu	lts	
	Area Scan	Zoom Scan
Date	2022-08-29, 10:33	2022-08-29, 10:52
psSAR1g [W/Kg]	0.700	0.729
psSAR10g	0.296	0.316
[W/Kg]		
Power Drift [dB]	0.01	-0.14
Power Scaling	Disabled	Disabled
Scaling Factor		
[dB]		
TSL Correction	Positive Only	Positive Only
M2/M1 [%]		60.5
Dist 3dB Peak		15.2
[mm]		





Rev. 00

2. System Check Body Liquid 5800MHz

Device under Test Properties

Model, Manufacturer	Dimensions [mm]	S/N	DUT Type
D5GHzV2, SPEAG	50.0 x 10.0 x 8.0	1259	Validation Dipole

Exposure Conditions

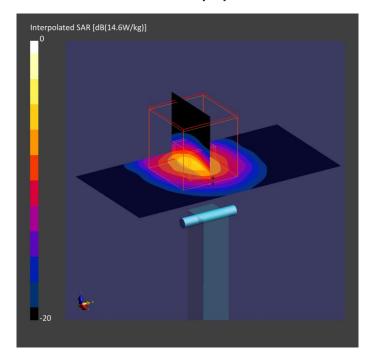
Phantom Section, TSL	Position, Test Band Distance [mm]	Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat,	,	,	5800.0,	4.0	6.18	46.4
MSI		0	0			

Hardware Setup

Phantom	TSL, Measured Date	Probe, Calibration Date	DAE, Calibration Date
ELI V8.0 (20deg probe tilt)	MBBL-600-6000, 2022-Aug-29	EX3DV4 - SN7325, 2021-12-15	DAE4ip Sn1705, 2022-04-28

Scan Setup	Area Scan	Zoom Scan
Grid Extents [mm]	40.0 x 80.0	22.0 x 22.0 x 22.0
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4
Sensor Surface	3.0	1.4
[mm]		
Graded Grid	No	Yes
Grading Ratio	n/a	1.4
MAIA	Confirmed by MAIA	Confirmed by MAIA
Surface Detection	VMS + 6p	VMS + 6p
Scan Method	Measured	Measured

Measurement Results Area Scan Zoom Scan Date 2022-08-29, 09:27 2022-08-29, 09:34 psSAR1g [W/Kg] psSAR10g 2.94 3.42 0.939 1.04 [W/Kg] Power Drift [dB] 0.20 -0.19 Power Scaling Disabled Disabled Scaling [dB] TSL Correction Positive Only Positive Only M2/M1 [%] Dist 3dB Peak 59.4 8.2 [mm]





Annex D. TSL Dielectric Parameters

D.1 Body 5700MHz-5900MHz

Freq.(MHz)	Target		Measured 2022-08-29	
	ε'(F/m)	σ(S/m)	ε'1(F/m)	σ1(S/m)
5100	49.15	5.18	47.76	5.17
5150	49.08	5.24	47.66	5.25
5200	49.01	5.30	47.56	5.33
5250	48.95	5.36	47.48	5.41
5300	48.88	5.42	47.41	5.49
5350	48.81	5.47	47.33	5.57
5400	48.74	5.53	47.25	5.64
5450	48.67	5.59	47.17	5.71
5500	48.61	5.65	47.09	5.77
5550	48.54	5.71	47.01	5.83
5600	48.47	5.77	46.93	5.90
5650	48.40	5.82	46.81	5.97
5700	48.34	5.88	46.70	6.04
5750	48.27	5.94	46.56	6.11
5800	48.20	6.00	46.44	6.18
5850	48.13	6.06	46.29	6.25
5900	48.06	6.12	46.13	6.31

