

# intel.

## TEST REPORT

EUT Description	WLAN and BT, 2x2 PCIe M.2 1216 ada	pter card	
Brand Name	Intel® Wi-Fi 6 AX204		
Model Name	AX204D2W		
FCC ID	PD9AX204D2		
Date of Test Start/End	2022-04-01 / 2022-04-08		
Features	<b>802.11ax R2, Dual Band, 2x2 Wi-Fi 6 +</b> (see section 5)	Bluetooth® 5.2	
Description	Engineering sample + Skycross anter	nna	
Applicant	Intel Mobile Communications		
Address	100 Center Point Circle, Suite 200 / Co	lumbia, 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	0.72 W/kg (1g)	1.6 W/kg (1g)	
Min. test separation distance	19mm to phantom		
Test Report identification	220225-03.TR12		
Revision Control	Rev. 00 This test report revision replaces any (see section 8)	previous test report revision	
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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

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FCC



#### 1. Standards, reference documents and applicable test methods

- 1. FCC Title 47 CFR Part §2.1093 Radiofrequency radiation exposure evaluation: portable devices. 2019-10-01 Edition
- 2. FCC OET KDB 248227 D01 v02r02 SAR guidance for IEEE 802.11 (Wi-Fi) transmitters.
- 3. FCC OET KDB 447498 D01 v06 –RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices.
- 4. FCC OET KDB 616217 D04 v01r02 SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers.
- 5. FCC OET KDB 865664 D01 v01r04 SAR Measurement Requirements for 100 MHz to 6 GHz.
- 6. 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

- ✓ 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 declines any responsibility with respect to the identified information provided by the customer and that may affect the validity of results.
- 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.
- $\checkmark$  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.
- ✓ Complete or partial reproduction of the report cannot be made without written permission of Intel WRF Lab.

## 3. Environmental Conditions

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

Temperature	22.0°C ± 2°C	
Humidity	40% ± 10%	
Liquid Temperature	22°C ± 2°C	

## 4. Test samples

Sample	Control #	Description	Model	Serial #	Date of receipt	Note
	220225- 03.S10	WLAN and BT, 2x2 PCIe M.2 1216 adapter card	AX204D2W	C8CB9E88C331	2022-03- 15	-
	210611- 02.\$32	NGFF Extender	PCB00651_01	6515219-224 / AS000651-1-502	2021-08- 06	-
#01	170000- 01.S12	Laptop	Latitude 7490	9KWMRQ2	2020-10- 22	-
	200611- 03.S36	Reference Antenna	Sky-Cross	-	2020-12- 07	-
	200611- 03.S37	Reference Antenna	Sky-Cross	-	2022-03- 22	-

## 5. EUT Features

The herein information is provided by the customer

Brand Name	Intel® Wi-Fi 6 AX204			
Model Name	AX204D2W			
Software Version	DRTU.01188.99.0.69			
Driver Version	WLAN 99.0.70.4, BT 22.1	140.51677.22111		
Prototype / Production	Production			
Host Identification	Engineering sample			
Supported Radios	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)       5.6GHz (5470.0 – 5725.0 MHz)         5.8GHz (5725.0 – 5895.0 MHz)       2.4GHz (2400.0 – 2483.5 MHz)			
Antenna Information	Transmitter Manufacturer Antenna type Part number See Annex <i>F</i> for more de	Chain A SkyCross PIFA n/a tails on antennas location.	Chain B SkyCross PIFA n/a	
Simultaneous Transmission Configurations	WLAN 2.4GHz Chain B + BT Chain A WLAN 2.4GHz Chain B + WLAN 2.4GHz Chain A WLAN 5GHz Chain B + BT Chain A WLAN 5GHz Chain B + WLAN 5GHz Chain A WLAN 5GHz Chain B + WLAN 5GHz Chain A + BT Chain A			
Additional Information	No WWAN transmitter is considered in this report5.60-5.65 GHz band (TDWR) is supported by the device			
	Band gap is supported by the device			

## **Supported Radios**

Mode	Duty Cycle	Modulation	Band	UL Freq Range (MHz)	Measured Max. Conducted Power (dBm)
802.11b/g/n/ax	100%	BPSK QPSK 16QAM 64QAM	2.4GHz	2400-2483.5	20.99
	100%	BPSK QPSK 16QAM 64QAM	5.2GHz	5150-5250	NM
000 110/0/00/00			5.3GHz	5250-5350	20.53
802.11a/n/ac/ax			5.6GHz	5475-5725	20.77
		256QAM	5.8GHz	5725-5850	20.87
BDR/EDR v5.2	77%	GFSK π/4 DQPSK 8DPSK	2.4GHz	2400-2483.5	14.68
Bluetooth LE v5.2	33%	GFSK	2.4GHz	2400-2483.5	NM

NM: Not Measured



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Maximum Output pow	SISO	mode		
Equipment Class	Mode	BW (MHz)	Port1 / Aux (dBm)	Port 2 / Main (dBm)
	802.11b	20	21.00	21.00
	802.11g	20	21.00	21.00
DTS	802.11n20	20	21.00	21.00
010	802.11ax20	20	21.00	21.00
	802.11n40	40	21.00	21.00
	802.11ax40	40	21.00	21.00
	802.11a	20	21.00	21.00
	802.11n20	20	21.00	21.00
	802.11ax20	20	21.00	21.00
U-NII-1	802.11n40	40	21.00	21.00
	802.11ax40	40	21.00	21.00
	802.11ac80	80	18.75	19.00
	802.11ax80	80	18.75	19.00
	802.11a	20	21.00	21.00
	802.11n20	20	21.00	21.00
	802.11ax20	20	21.00	21.00
	802.11n40	40	21.00	21.00
U-NII-2A	802.11ax40	40	21.00	21.00
	802.11ac80	80	18.00	18.00
	802.11ax80	80	18.00	18.00
	802.11ac160	160	14.50	15.00
	802.11ax160	160	14.50	15.00
	802.11a	20	21.00	21.00
	802.11n20	20	21.00	21.00
	802.11ax20	20	21.00	21.00
	802.11n40	40	21.00	21.00
U-NII-2C	802.11ax40	40	21.00	21.00
	802.11ac80	80	21.00	21.00
	802.11ax80	80	21.00	21.00
	802.11ac160	160	16.00	16.00
	802.11ax160	160	16.00	16.00
	802.11a	20	21.00	21.00
	802.11n20	20	21.00	21.00
	802.11ax20	20	21.00	21.00
U-NII-3	802.11n40	40	21.00	21.00
	802.11ax40	40	21.00	21.00
	802.11ac80	80	21.00	21.00
	802.11ax80	80	21.00	21.00
	Bluetooth v5.2 BDR	1	10.50	
	Bluetooth v5.2 EDR2	1	9.50	
BT	Bluetooth v5.2 EDR3	1	9.50	
	BLE	2	9.00	

#### 6. Remarks and comments

1. 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.h

#### 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
802.11b/g/n/ax	2.4GHz	0.28	Р
	5.2GHz	NM	NA
000 11 0/0/00/00/	5.3GHz	0.72	Р
802.11a/n/ac/ax	5.6GHz	0.31	Р
	5.8GHz	0.30	Р
Bluetooth	2.4GHz	0.05	Р

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)				
Expedition	Equipment Class			
Exposure Condition	DTS	DSS	U-NII	
Body Worn	0.28	0.05	0.72	
Simultaneous Tx Sum-SAR: 0.51 Sum-SAR: 1.07 Sum-SAR: 1.07				

Considering the results of the performed test according to FCC 47CFR Part 2.1093 the item under test 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	R. LUCIANI	First Issue



## 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 ( $\rho$ ).

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

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:

 $\sigma$  = Conductivity of the tissue (S/m)

 $\rho$  = Mass density of the tissue (kg/m3)

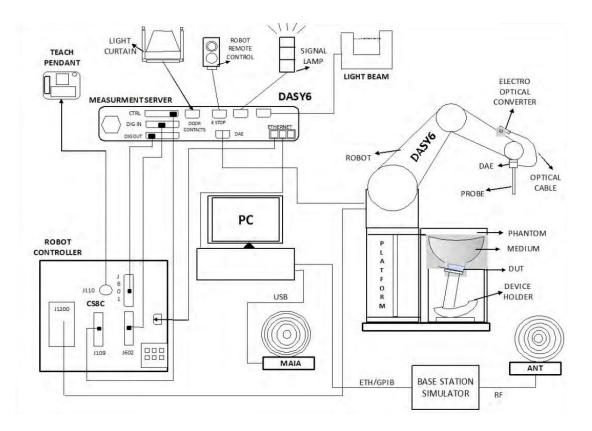
E = RMS electric field strength (V/m)



#### 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.
- $\checkmark$  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

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#### 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



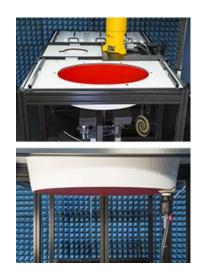


#### A.2.4 Flat Phantom

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:

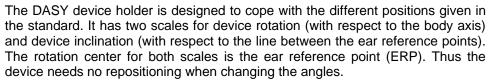
Material	Vinylester, glass fiber reinforced (VE-GF)
Shell thickness	2 mm ± 0.2 mm
Filling volume	30 Liters approx.
Dimensions	Major axis: 600mm / Minor axis: 400mm



#### 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 constructed of low-loss POM material having the following dielectric parameters: relative permittivity  $\varepsilon$ =3 and loss tangent  $\delta$ =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  $\pm 1$  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  $\pm 30^{\circ}$  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  $\pm 30^{\circ}$ , 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  $\pm 5\%$ .

#### 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.



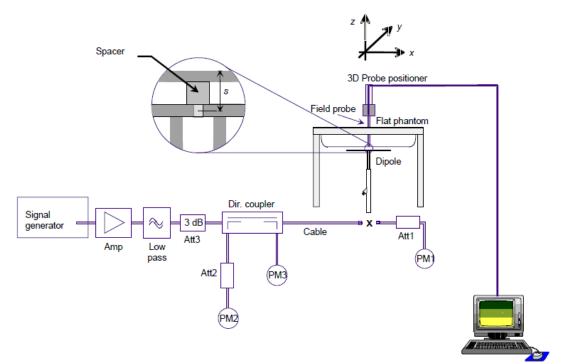
#### A.4 System and Liquid Check

#### 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 1528 and IEC 62209 standards.

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### 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	quency Body SAR						
(MHz)	ε <sub>r</sub> (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					

( $\epsilon_r$  = relative permittivity,  $\sigma$  = conductivity and  $\rho$  = 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  $\epsilon_r$  and  $\sigma$  may be relaxed to  $\pm$  10%.



#### Test Equipment List A.5

#### SAR system #4

ID #	Device	Type/Model	Serial Number	Manufacturer	Cal. Date	Cal. Due Date
004-006	Dosimetric E-field Probe	EX3DV4	7604	7604 SPEAG		2022-08-16
004-007	Data Acquisition Electronics	DAE4	1628	SPEAG	2021-08-06	2022-08-06
004-000	6-axis Robot	is Robot TX90 XL F11/5JL2A1/A/01 STAÜBLI		n/a	n/a	
004-001	Robot Controller	CS8C	F11/5JL2A1/C/01	STAÜBLI	n/a	n/a
004-005	Measurement Server	rement Server DASY6 - P/N: SE UMS 028 BB -		SPEAG	n/a	n/a
004-004	Light Beam Unit	SE UKS 030 AA 1030 Di-sor		Di-soric	n/a	n/a
004-002	Oval Flat Phantom	ELI v8.0	2124	SPEAG	n/a	n/a
004-005	Measurement SW	DASY6 16.0	9-658E90FA	SPEAG	n/a	n/a
004-010	Laptop Holder	P/N SM LH1 001 CD	-	SPEAG	n/a	n/a

## Shared equipment

Shared equi	pment					
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
126-000	Vector Signal Generator	ESG E4438C	MY45092885	Agilent	2021-05-27	2023-05-27
099-000	Liquid measurement SW	DAK-3.5 V3.0.2.3	9-2687B491	SPEAG	NA	NA
069-000	Dielectric Probe Kit	DAK-3.5	1309	SPEAG	2021-03-10	2023-03-10
078-000	RF Cable	ST- 18/SMAm/SMAm/48	1158830	Huber & Suhner	2022-02-01	2022-08-01
079-000	RF Cable	ST- 18/SMAm/SMAm/48	1158831	Huber & Suhner	2022-02-01	2022-08-01
077-000	Coupler	CD0.5-8-20-30	1251-002	Amd-group	2022-02-01	2022-08-01
198-000	0.8-21GHz RF amplifier	TVA-82-213A+	2004003	Mini-Circuits	2022-02-01	2022-08-01
141-000	USB Power Sensor	NRP-Z81	104381	R&S	2020-06-03	2022-06-03
070-000	2.45GHz System Validation Dipole	D2450V2	937	SPEAG	2020-05-12	2022-05-12
068-000	5GHz System Validation Dipole	D5GHzv2	1164	SPEAG	2021-05-18	2023-05-18
398-000	Thermometer	TESTO 922	33622932/208	TESTO	2021-11-09	2023-11-09
327-000	Temp & Humidity Logger	RA32E-TH1-RAS	RA32-F0DEF9	AVTECH	2021-03-09	2023-03-09
451-000	Reflectometer	R140	21190006	Copper Mountain	2021-11-09	2023-11-09

## A.5.1 Tissue Simulant Liquid

TSL	Manufacturer / Model	Freq Range (MHz)	Main Ingredients
Body WideBand	SPEAG MBBL600-6000V6 Batch 160630-1	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 1528-2013 and IEC 62209-1/2016, IEC 62209-2/2010							
Symbol	Error Description	Uncert. Value	Prob Dist.	Div.	(ci) 1g	(ci) 10g	Std Unc. (1g)	Std Unc. (10g)
Measure	ment 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 %	Ν	1	1	1	±1.8 %	±1.8 %
∆sys	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 %	Ν	1	2	2	±4.0 %	±4.0 %
Н	Device Holder	±3.6 %	N	1	1	1	±3.6 %	±3.6 %
MOD	DUT Modulationm	±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 %	Ν	1	1	1	±2.9 %	±2.9 %
Correctio	Correction to the SAR results							
$C(\varepsilon, \sigma)$ Deviation to Target		±1.9 %	N	1	1	0.84	±1.9 %	±1.6 %
Combi	ined Std. Uncertainty						±11.5 %	±11.4 %
Expand	ed 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	F. Heurtematte
SAR measurement	R. LUCIANI

#### **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 AX204 card (Engineering sample) using a set of Sky-Cross antennas. The card was operated utilizing proprietary software (DRTU version DRTU.01188.99.0.69) 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 D01 can be applied to determine SAR test exclusion for adjacent edge configurations. All six sides of the antenna were tested for SAR compliance with the antenna placed at 14mm 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
Position	<ul> <li>Front face</li> <li>Back Face</li> <li>Top edge</li> <li>Bottom edge</li> <li>Left edge</li> <li>Right edge</li> </ul>	<ul> <li>Front face</li> <li>Back Face</li> <li>Top edge</li> <li>Bottom edge</li> <li>Left edge</li> <li>Right edge</li> </ul>

See B.1.3.1 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

#### B.1.3.1 SAR evaluation exclusion

The SAR Test Exclusion Threshold in FCC OET KDB 447498 D01 v06 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:

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

(1)

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:

 $\langle (Power allowed at numeric threshold for 50 mm in (1)) + (test separation distance - 50 mm) \cdot (f_{MHZ}/150) \rangle mW$ , (2) for 100MHz to 1500MHz  $((Power allowed at numeric threshold for 50 mm in (1)) + (test separation distance - 50 mm) \cdot 10))mW$ , (3)

for 1500MHz and  $\leq 6GHz$ 

LAN	Band	Output	t power	Front	Back	Тор	Right	Left	Bottom	Front	Back	Тор	Right	Left	Bottom
Antenna	Name	dBm	МШ	nt Face	k Face	Edge	ıt Edge	Edge	m Edge	it Face	k Face	Edge	it Edge	Edge	m Edge
	DTS	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Т	Т	Т	Т
WLAN	U-NII-1	21.0	125.9	<50	<50	<50	<50	<50	<50	R	R	R	R	R	R
Port 2	U-NII-2A	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Н	Т	Т	Т
Main	U-NII-2C	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Н	Т	Т	Т
	U-NII-3	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Н	Т	Т	Т
	DTS	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Н	Т	Т	Т
	U-NII-1	21.0	125.9	<50	<50	<50	<50	<50	<50	R	R	R	R	R	R
WLAN Port 1	U-NII-2A	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Н	Т	Т	Т
Aux	U-NII-2C	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Т	Т	Т	Т
	U-NII-3	21.0	125.9	<50	<50	<50	<50	<50	<50	Т	Т	Т	Т	Т	Т
T. Tested per	BT	15.0	31.6	<50	<50	<50	<50	<50	<50	Т	Т	Т	Т	Т	Т

T: Tested position

R: Reduced

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



#### B.1.3.2 General SAR test reduction

According to FCC OET KDB 447498 D01, 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:

•  $\leq$  0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq$  100 MHz

•  $\leq$  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

•  $\leq$  0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq$  200 MHz

#### WLAN SAR Test reduction

Transmission Mode	SAR test exclusion/reduction
DSSS	<ul> <li>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:</li> <li>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.</li> <li>When the reported SAR is &gt; 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is &gt; 1.2 W/kg, SAR is required for the third channel.</li> <li>According to FCC OET KDB 248227 D01, SAR is not required for 2.4 GHz OFDM conditions when</li> </ul>
	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.
OFDM	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. 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 <i>initial test configuration</i> 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 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 unitil reported SAR is ≤ 1.2 W/kg or all required channels are tested.

#### **B.2 Conducted Power Measurements**

#### **B.2.1 WLAN 2.4GHz**

					Port 1	/ Aux	Port B	/ Main	SAR																				
Band	Mode	Data Rate	Ch #	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Test?																				
			1	2412	20.96	21.00	20.99	21.00	Yes																				
	802.11b	1Mbps	6	2437	20.77	21.00	20.90	21.00																					
			11	2462	20.90	21.00	20.80	21.00																					
			1	2412	_	19.75		20.00																					
	802.11g	6Mbps	6	2437		21.00		21.00																					
			11	2462		18.75		18.50																					
		HT0	1	2412		19.75		20.00																					
2.4GHz (DTS)	802.11n20		HT0	HT0	HT0	HT0	HT0	НТО	HT0	HT0	HT0	HT0	HT0	HT0	6	2437		21.00		21.00									
GH2			11	2462		18.75		18.50																					
		HE0	1	2412	-	19.75		20.00																					
TS)	802.11ax20		HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0		6	2437	NR <sup>1</sup>	21.00	NR <sup>1</sup>	21.00
			11	2462		18.75		18.50																					
			3	2422		16.25		16.00																					
	802.11n40	НТО	HT0	НТО	НТО	HT0	HT0	нто	нто	HT0	нто	HT0	НТО	НТО	HT0	HT0	HT0	НТ0	нто				21.00		21.00				
	802.11ax40 H		9	2452		17.50		16.00	-																				
			3	2422		16.25		16.00																					
		HE0	6	2437		21.00		21.00																					
Initial test of			9	2452		17.50		16.00																					

Initial test configuration

1.

NR: Not Required As per FCC OET KDB 248227 D01, conducted output power and SAR testing are not required for 802.11g/n/ax channels 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  $\leq$  1.2W/kg. 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  $\leq$  1.2 W/kg or all required channels are tested. 2.

3.



### B.2.2 WLAN 5GHz (U-NII)

#### B.2.2.1 5.2GHz and 5.3GHz (U-NII-1 and U-NII-2A)

					Port 1	/ Aux	Port B	/ Main																			
Band	Mode	Data Rate	Ch #	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	SAR Test?																		
			36 5180			20.00		20.00																			
	802.11a	6Mbpa	40	5200		21.00		21.00																			
	002.11a	UNIDPS	6Mbps	44	5220		21.00		21.00																		
			48	5240		21.00		21.00																			
			HT0 36 5180 20.00 40 5200 21.00	20.00		20.00																					
	802.11n20	што		5200		21.00		21.00																			
(J)	002.11120		44	5220	-	21.00		21.00																			
5.2G			48	5240		21.00		21.00																			
Ηz		ax20 HE0	36	5180		20.00		20.00	N 2																		
ç	802.11ax20		HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0			HEO	HEO	HEO	HEO	HEO	HEO	40	5200	NR <sup>1,3</sup>	21.00	NR <sup>1,3</sup>	21.00	No <sup>2</sup>
5.2GHz (U-NII-1)	002.11ax20												44	5220		21.00		21.00									
<u> </u>			48	5240		21.00	1	21.00																			
	802 11 0 40	802 11p40	902 11p 10	802 11n40	802.11n40				38	5190		19.25		18.25													
	002.111140	HT0	46	5230		21.00		21.00																			
	902 11ov 40		38	5190		19.25		18.25																			
	802.11ax40	HE0 VHT0	46	5230		21.00	-	21.00																			
	802.11ac80		42	5210		18.75		19.00																			
Initial toot o	802.11ax80	HE0	42	5210		18.75		19.00																			

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 §B.5.2 in this document).

 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.



					Port	1 / Aux	Port	B / Main	SAR
Band	Mode	Data Rate	Ch #	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Test?
			52	5260		21.00		21.00	
	802.11a	6Mbps	56	5280		21.00		21.00	
	002.11a	olviops	60	5300		21.00		21.00	
			64	5320	_	21.00		21.00	
			52	5260		21.00		21.00	
	802.11n20	HT0	56	5280	NR <sup>1,3</sup>	21.00	NR <sup>1,3</sup>	21.00	No <sup>2,5</sup>
	802.11120	60         5300         21.00           64         5320         21.00	21.00		21.00	No <sup>2,5</sup>			
വ			64	5320		21.00		21.00	
.3G	5.3GHz (U-NII-2A)	HEO	52	5260		21.00	-	21.00	
Hz	802.11ax20		56	5280		21.00		21.00	
-U)	002.11ax20		60	5300		21.00		21.00	
			64	5320		21.00		21.00	
PA)	802.11n40	HT0	54	5270	20.10	21.00	20.53	21.00	Yes
	802.11140	IIIO	62	5310	17.39	18.00	17.98	18.00	No <sup>4</sup>
	802.11ax40	HE0	54	5270		21.00		21.00	
	002.11ax40	TIEU	62	5310		18.00		18.00	
	802.11ac80	lac80 VHT0	58	5290		18.00		18.00	
	802.11ax80 802.11ac160	HE0	58	5290	NR <sup>1,3</sup>	18.00	NR <sup>1,3</sup>	18.00	No <sup>2,5</sup>
		VHT0	50	5250		14.50	1	15.00	
	802.11ax160	HE0	50	5250		14.50		15.00	1

Initial test configuration

1. NR: Not Required

- 2. 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)
- 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. 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.
- 5. 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.
- 6. 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.2.2.2 5.6 (U-NII-2C)

					Port	1 / Aux	Port	B / Main																				
Band	Mode	Data Rate	Ch #	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	SAR Test?																			
			100	5500		21.00		21.00																				
			104	5520		21.00		21.00																				
			108	5540		21.00		21.00																				
	802.11a	6Mbps	112	5560		21.00		21.00																				
	002.11a	olviops	116	5580		21.00	-	21.00																				
			120	5600		21.00		21.00																				
			124	5620		21.00		21.00																				
			128	5640	_	21.00		21.00																				
			100	5500		21.00		21.00																				
			104	5520		21.00		21.00																				
			108 5540 21.00		21.00																							
	802.11n20	нто	112	5560		21.00		21.00																				
	002.111120	піо	116	5580		21.00		21.00																				
			120	5600		21.00		21.00																				
								124	5620		21.00		21.00															
			128	5640	- NR <sup>1,3</sup>	21.00	NR <sup>1,3</sup>	21.00	No <sup>4,6</sup>																			
5.6			100 5500 NR <sup>1,3</sup>	21.00	INR',°	21.00																						
5.6GHz (U-NII-2C)		HE0	HE0	HE0	HE0	HE0	HE0	HE0	HE0	104	5520		21.00		21.00													
z (										HE0	HE0	HE0	HE0	HE0				HEO	HEO	HE0	HE0	108	5540		21.00		21.00	
U-7	802.11ax20																					112	5560		21.00		21.00	
III-2	002.118.20														116	5580		21.00		21.00								
lõ)			120	5600		21.00		21.00																				
			124	5620		21.00		21.00																				
			128	5640		21.00		21.00																				
			102	5510		20.75		20.25																				
	802.11n40	нто	110	5550		21.00		21.00																				
	002.111140	піо	118	5590		21.00		21.00																				
			126	5630		21.00		21.00																				
			102	5510		20.75		20.25																				
	802 11av/0	НЕО	110	5550		21.00		21.00																				
	802.11ax40 HE0	TIEU	118	5590		21.00		21.00																				
			126	5630		21.00		21.00																				
	802 112080	ИНТО	106	5530	18.95	19.25	18.68	19.00	No⁵																			
	802.11ac80         VHT0           802.11ax80         HE0           802.11ac160         VHT0	VIIIO	122	5610	20.77	21.00	20.62	21.00	Yes																			
		106	5530		19.00		19.25																					
		122	5610	NR <sup>1,3</sup>	21.00	NR <sup>1,3</sup>	21.00	No <sup>4,6</sup>																				
		VHT0	114	5570	INFX /*	16.00	INFX "	16.00																				
	802.11ax160 configuration	HE0	114	5570		16.00		16.00																				

1. NR: Not Required

 When band gap channels between U-NII-2C and U-NII-3 band are supported channels in U-NII-2C band below 5.65 GHz are considered as one band and channels above 5.65 GHz, together with channels in 5.8 GHz U-NII-3 or §15.247 band, are considered as a separate band

 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



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- 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.2.2.3 5.8GHz (U-NII-3)

					Port 1	/ Aux	Port B	/ Main	SAR
Band	Mode	Data Rate	Ch #	Freq (MHz)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Avg Pwr (dBm)	Tune-up Pwr (dBm)	Test?
			132	5660		21.00		21.00	
			136	5680		21.00		21.00	
			140	5700		20.75		20.75	
	000.44		149	5745		21.00		21.00	
	802.11a	6Mbps	153	5765		21.00		21.00	
			157	5785	-	21.00		21.00	
			161	5805		21.00		21.00	
			165	5825		21.00		21.00	
			132	5660	NR <sup>1</sup>	21.00		21.00	
			136	5680		21.00		21.00	
			140	5700		20.75		20.75	
	000 11=00		149	5745		21.00		21.00	No <sup>4,6</sup>
	802.11n20	HT0	153	5765		21.00	$NR^1$	21.00	INO ","
			5785		21.00		21.00		
сл	တု ၂		161	5805	-	21.00		21.00	
5.6-5.8GHz (U-NII-3)			165	5825		21.00		21.00	
5.8			132	5660		21.00		21.00	
GH			136	5680		21.00		21.00	
z ((			140	5700		20.75		20.75	
-z	802.11ax20	HEO	149	5745		21.00		21.00	
II-3	002.118.20	ΠEU	153	5765		21.00		21.00	
$\sim$			157	5785		21.00		21.00	
			161	5805		21.00		21.00	
			165	5825		21.00		21.00	
			134	5670		21.00		21.00	
	802.11n40	НТО	142	5710		21.00		21.00	
	002.11140	1110	151	5755		21.00		21.00	
			159	5795	NR <sup>1</sup>	21.00	NR <sup>1</sup>	21.00	No <sup>4,6</sup>
			134	5670		21.00	INK	21.00	INO /
	802.11ax40 HE0		142	5710		21.00		21.00	
		ΠEU	151	5755		21.00		21.00	1
			159	5795		21.00		21.00	
		√нто	138	5690	20.83	21.00	20.87	21.00	Yes
	002.118000	802.11ac80 VHT0 802.11ax80 HE0	155	5775	20.74	20.75	20.87	21.00	No <sup>4,5</sup>
	802.11ax80		138	5690	NR <sup>1</sup>	21.00	NR <sup>1</sup>	21.00	No <sup>4,6</sup>
		TILU	155	5775	INIX	20.75	INIX	21.00	- N0 <sup>4,0</sup>

Initial test configuration

NR: Not Required

 When band gap channels between U-NII-2C and U-NII-3 band are supported channels in U-NII-2C band below 5.65 GHz are considered as one band and channels above 5.65 GHz, together with channels in 5.8 GHz U-NII-3 or §15.247 band, are considered as a separate band

 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) 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)

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.



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- 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.
- configuration.
  7. 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.2.3 Bluetooth

Band	Mode	Data Rate	Channel	Frequency (MHz)	Antenna	Avg Pwr (dBm)	Tune-up Pwr (dBm)
			0	2402		14.68	15.00
	Bluetooth v5.2	Basic rate GFSK	39	2441		14.60	15.00
	V0.2		78	2480		14.66	15.00
			0	2402			15.00
	Bluetooth v5.2	Basic rate π/4 DQPSK	39	2441			15.00
2.40	V0.2		78	2480	Chain A		15.00
2.4GHz			0 2402		15.00		
	Bluetooth v5.2	Basic rate 8-DPSK	39	2441		NR <sup>1</sup>	15.00
	V0.2		78	2480			15.00
			0	2412			15.00
	Bluetooth v5.2	Low energy GFSK	20	2442			15.00
1.141.1.4			39	2480			15.00

Initial test configuration 1. NR: Not Required



### B.3 Tissue Parameters Measurement

#### Body TSL

Freq.(MHz)	Target Pa	arameters		red TSL neters	Deviat	ion (%)	Date
	ε'(F/m)	σ(S/m)	ε'(F/m)	σ(S/m)	Deviation ε'	Deviation $\sigma$	
2450	52.70	1.95	49.18	1.99	-6.68	2.05	
5200	49.01	5.30	44.60	5.00	-9.00	-5.66	
5300	48.88	5.42	44.50	5.16	-8.96	-4.80	2022-04-04
5500	48.61	5.65	44.42	5.40	-8.62	-4.42	2022-04-04
5600	48.47	5.77	44.41	5.51	-8.38	-4.51	
5800	48.20	6.00	44.00	5.82	-8.71	-3.00	
2450	52.70	1.95	51.32	1.93	-2.62	-1.03	
5200	49.01	5.30	46.51	5.20	-5.10	-1.89	
5300	48.88	5.42	46.36	5.36	-5.16	-1.11	2022-04-07
5500	48.61	5.65	46.03	5.62	-5.31	-0.53	2022-04-07
5600	48.47	5.77	45.84	5.74	-5.43	-0.52	
5800	48.20	6.00	45.41	6.01	-5.79	0.17	

See 0 for more details

## B.4 System Check Measurements

Frequency (MHz)	Average	Target SAR (W/kg)	Measured SAR (W/kg)	Deviation to target (%)	Limit (%)	Date	
2450	1g	48.60	49.20	1.23		2022-04-08	
2450	10g	23.00	22.40	-2.61		2022-04-08	
5300	1g	71.70	74.20	3.49	± 10		
5300	10g	20.00	20.80	4.00	± 10	2022-04-06	
5600	1g	76.50	78.60	2.75		2022-04-00	
5600	10g	21.20	21.80	2.83			

See Annex C for more details.

#### B.5 SAR Test Results

Ant.	Mode Data rate	BW (MHz)	Ch #	Freq (MHz)	Position	Correct. Factor (dB)	SAR 1g (W/kg)	Reported SAR 1g (W/kg)	Plot #
					Back Face		0.04	0.05	
					Bottom Edge		0.01	0.02	
Port 1	802.15	1	0	2402	Front Face	0.32	0.04	0.05	
Aux	DH5	1			Left Edge	0.32	0.03	0.04	
					Right Edge	]	0.01	0.01	
					Top Edge		0.01	0.02	
					Back Face		0.28	0.28	1
				Bottom Edge		0.08	0.08		
Port 2			1	2412	Front Face	0.01	0.28	0.28	
Main			1		Left Edge	0.01	0.17	0.17	
					Right Edge		0.04	0.04	
	802.11b	20			Top Edge		0.06	0.06	
	1Mbps	20			Back Face		0.23	0.23	
					Bottom Edge		0.08	0.08	
Port 1			1	2412	Front Face	0.04	0.21	0.22	
Aux			1	2412	Left Edge	0.04	0.15	0.15	
					Right Edge		0.06	0.06	
					Top Edge		0.06	0.06	

## B.5.1 Bluetooth & 802.11b/g/n/ax – 2.4GHz – DTS – BT (DSS)

## B.5.2 802.11a/n/ac/ax - 5.3 GHz - U-NII-2A

Ant.	Mode Data rate	BW (MHz)	Ch #	Freq (MHz)	Position	Correct. Factor (dB)	SAR 1g (W/kg)	Reported SAR 1g (W/kg)	Plot #
					Back Face		0.30	0.33	
		40			Bottom Edge		0.16	0.18	
Port 2	802.11n		54	5270	Front Face	0.47	0.24	0.26	
Main HT0	40	54	5270	Left Edge	0.47	0.28	0.31		
				Right Edge		0.02	0.02		
					Top Edge		0.22	0.25	
					Back Face	-	0.34	0.42	
					Bottom Edge		0.21	0.26	
Port 1	802.11n	40	E A	5270	Front Face	0.90	0.25	0.31	
Aux	HT0	40	54	5270	Left Edge	0.90	0.58	0.72	2
					Right Edge	_	0.02	0.02	
					Top Edge		0.26	0.32	



## B.5.3 802.11a/n/ac/ax - 5.6 GHz - U-NII-2C

Ant.	Mode Data rate	BW (MHz)	Ch #	Freq (MHz)	Position	Correct. Factor (dB)	SAR 1g (W/kg)	Reported SAR 1g (W/kg)	Plot #
				5610	Back Face		0.22	0.24	
			122		Bottom Edge		0.22	0.24	
Port 2	Port 2 802.11ac Main VHT0	80			Front Face	0.38	0.24	0.26	
Main VHT0	VHT0	00		0010	Left Edge	0.00	0.14	0.15	
					Right Edge		0.02	0.02	
					Top Edge		0.14	0.16	
					Back Face	-	0.16	0.16	
					Bottom Edge		0.08	0.09	
Port 1	802.11ac	80	122	5610	Front Face	0.23	0.16	0.17	
Aux	VHT0	00	122	5010	Left Edge	0.23	0.29	0.31	3
					Right Edge		0.01	0.01	
					Top Edge		0.15	0.15	

## B.5.4 802.11a/n/ax - 5.8 GHz - U-NII-3

Ant.	Mode Data rate	BW (MHz)	Ch #	Freq (MHz)	Position	Correct. Factor (dB)	SAR 1g (W/kg)	Reported SAR 1g (W/kg)	Plot #
					Back Face		0.18	0.19	
			400		Bottom Edge		0.05	0.05	
Port 2		80		5000	Front Face	0.42	0.20	0.20	
Main VHT0	80	138	5690	Left Edge	0.13	0.14	0.14		
					Right Edge		0.01	0.02	
					Top Edge		0.11	0.11	
					Back Face	-	0.17	0.18	
					Bottom Edge		0.09	0.09	
Port 1	802.11ac	80	138	5690	Front Face	0.17	0.18	0.18	
Aux	VHT0				Left Edge		0.29	0.30	4
					Right Edge		0.01	0.01	
					Top Edge		0.16	0.17	

#### **B.5.5 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.5.6 Simultaneous Transmission SAR Evaluation**

According to FCC OET KDB 447498 D01, 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

Antenna	Position	Highest Reported SAR (1g) (W/Kg)					
Antenna	POSITION	WLAN 2.4GHz	WLAN 5GHz	Bluetooth			
	Back Face	0.23	0.42	0.05			
	Bottom Edge	0.08	0.26	0.02			
Port 1	Front Face	0.22	0.31	0.05			
Aux	Left Edge	0.15	0.72	0.04			
	Right Edge	0.06	0.02	0.01			
	Top Edge	0.06	0.32	0.02			
	Back Face	0.28	0.33				
	Bottom Edge	0.08	0.24				
Port 2	Front Face	0.28	0.26				
Main	Left Edge	0.17	0.31				
	Right Edge	0.04	0.02				
	Top Edge	0.06	0.25				

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Position	Simultaneous Tx A	ntenna Combination	Σ SAR 1g (W/kg)	Limit (W/kg)	
	Port 1 / Aux	Port 2 / Main			
	WLAN 5GHz	WLAN 5GHz	0.57		
	WLAN 5GHz + BT	WLAN 5GHz	0.62		
Front Face	BT	WLAN 5GHz	0.31		
	WLAN 2.4GHz	WLAN 2.4GHz	0.50		
	BT	WLAN 2.4GHz	0.33		
	WLAN 5GHz	WLAN 5GHz	0.75		
	WLAN 5GHz + BT	WLAN 5GHz	0.80		
Back Face	BT	WLAN 5GHz	0.38		
	WLAN 2.4GHz	WLAN 2.4GHz	0.51		
	BT	WLAN 2.4GHz	0.33		
	WLAN 5GHz	WLAN 5GHz	0.57		
	WLAN 5GHz + BT	WLAN 5GHz	0.59		
Top Edge	BT	WLAN 5GHz	0.27		
	WLAN 2.4GHz	WLAN 2.4GHz	0.12		
	BT	WLAN 2.4GHz	0.08	1.6	
	WLAN 5GHz	WLAN 5GHz	0.50	1.0	
	WLAN 5GHz + BT	WLAN 5GHz	0.52	]	
Bottom Edge	BT	WLAN 5GHz	0.26		
	WLAN 2.4GHz	WLAN 2.4GHz	0.16		
	BT	WLAN 2.4GHz	0.10		
	WLAN 5GHz	WLAN 5GHz	1.03		
	WLAN 5GHz + BT	WLAN 5GHz	1.07	7	
Left Edge	BT	WLAN 5GHz	0.35	7	
	WLAN 2.4GHz	WLAN 2.4GHz	0.32	7	
	BT	WLAN 2.4GHz	0.21	7	
	WLAN 5GHz	WLAN 5GHz	0.04	7	
Right Edge	WLAN 5GHz + BT	WLAN 5GHz	0.05		
	BT	WLAN 5GHz	0.03	7	
	WLAN 2.4GHz	WLAN 2.4GHz	0.10	7	
	BT	WLAN 2.4GHz	0.05	7	

Considering the results described above and according to the simultaneous transmission SAR test exclusion considerations described in FCC OET KDB 447498 D01, no SAR to Peak Location Separation Ratio is required.



## Annex C. Test System Plots

1.	DTS - 802.11b20, CH1, Main Antenna – Back Face - Skycross	
2.	UNII-2A - 802.11n40, CH54, Aux Antenna – Left Edge - Skycross	
3.	UNII-2C - 802.11ac80, CH122, Aux Antenna – Left Edge - Skycross	40
4.	UNII-3 - 802.11ac80, CH138, Aux Antenna – Left Edge - Skycross	41
5.	System Check Body Liquid 2450.0MHz	42
6.	System Check Body Liquid 5300.0MHz	43
7.	System Check Body Liquid 5600.0MHz	44

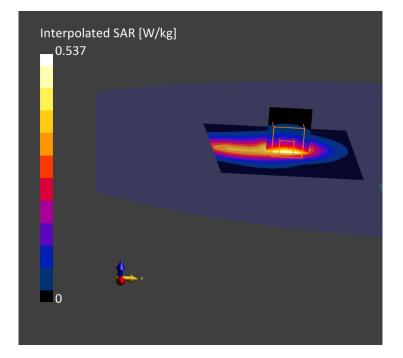


## 1. DTS - 802.11b20, CH1, Main Antenna – Back Face - Skycross

Model, Manufa	cturer	Dimensions [	mm] IN	/EI	DUT Typ	е		
AX204D2W, IN	ITEL	40.0 x 70.0 x	1.0 C	8CB9E88C331	Module			
Exposure Co	nditions							
Phantom Section, TSL	Position, T Distance [m		Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Perm	ittivity
Flat,	BACK,	WLAN	WLAN,	2412.0,	8.26	1.89	51.4	
MSL	19.00	2.4GHz	10415-AAA	1				
Phantom ELI V8.0 (20de 2124	eg probe tilt) -	TSL, Measure MBBL-600-60	00, 2022-Apr-07	Probe, Calib EX3DV4 - St	N7604, 2021-08-16	DAE, Calibra DAE4 Sn1628		
Scan Setup				Measuren	nent Results			
Grid Extents [n	nml 1	Area Scan	<b>Zoom Sca</b> 30.0 x 30.0 x 30.0			Area S	Scan	Zoon Scar
Grid Steps [mr		10.0 x 10.0	5.0 x 5.0 x 1.	-		2022-04-07, 1	5:04	2022
	face	3.0	1.			,		04-07 15:14
Graded Grid		Yes	Ye	s psSAR1g [\	W/Kg]	0	.275	0.279
Crading Datia		1 5	1		$\left[ \frac{1}{2} \right]$	0	150	0 1 5 9

	Area Scan	Zoom Scan
Grid Extents [mm]	120.0 x 160.0	30.0 x 30.0 x 30.0
Grid Steps [mm]	10.0 x 10.0	5.0 x 5.0 x 1.5
Sensor Surface	3.0	1.4
[mm]		
Graded Grid	Yes	Yes
Grading Ratio	1.5	1.5
MAIA	Confirmed by MAIA	Confirmed by MAIA
Surface Detection	VMS + 6p	VMS + 6p
Scan Method	Measured	Measured

	Area Scan	Scan
Date	2022-04-07, 15:04	2022-
		04-07,
		15:14
psSAR1g [W/Kg]	0.275	0.279
psSAR10g [W/Kg]	0.153	0.158
Power Drift [dB]	0.00	0.07
Power Scaling Scaling Factor [dB]	Disabled	Disabled
TSL Correction	Positive Only	Positive Only

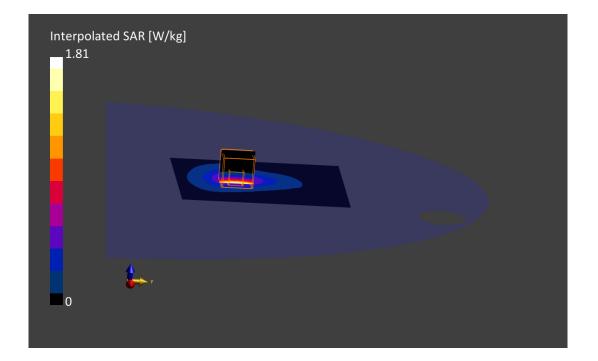




## 2. UNII-2A - 802.11n40, CH54, Aux Antenna – Left Edge - Skycross

Model, Manufact	urer	<b>Dimensions</b> [	mm] II	MEI	DUT Typ	е	
AX204D2W, INT	EL	40.0 x 70.0 x	1.0 C	8CB9E88C331	Module		
xposure Con	ditions						
Phantom Section, TSL	Position, Te Distance [mn		Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, MSL	EDGE LEFT, 19.00	WLAN 5GHz	WLAN, 10427-AAC	5270.0, 54	4.7	5.12	44.5
lardware Setu	р	TSL, Measure	ad Data	Probe, Calib	ration Data	DAE, Calib	ration Data
ELI V8.0 (20deg 2124	probe tilt) -	,	00, 2022-Apr-04	,	17604, 2021-08-16	,	28, 2021-08-06
Scan Setup				Measurem	ent Results		
		Area Scan	Zoom Sca	n	Are	a Scan	Zoom Scan
Grid Extents [mn	n] 10	0.0 x 160.0	22.0 x 22.0 x 22.	.0 Date	2022-04-05	5, 12:00 2	2022-04-05, 12:11
Grid Steps [mm]		10.0 x 10.0	4.0 x 4.0 x 1.	.4 psSAR1g [V	V/Kg]	0.575	0.585

	100.0 x 100.0	ZZ.0 X ZZ.0 X ZZ.0	Date	2022-04-03, 12.00	2022-04-03, 12.11
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4	psSAR1g [W/Kg]	0.575	0.585
Sensor Surface	3.0	1.4	psSAR10g	0.248	0.253
[mm]			[W/Kg]		
Graded Grid	Yes	Yes	Power Drift [dB]	-0.17	-0.07
Grading Ratio	1.5	1.4	Power Scaling	Disabled	Disabled
MAIA	Confirmed by MAIA	Confirmed by MAIA	Scaling Factor		
Surface Detection	VMS + 6p	VMS + 6p	[dB]		
Scan Method	Measured	Measured	TSL Correction	Positive Only	Positive Only

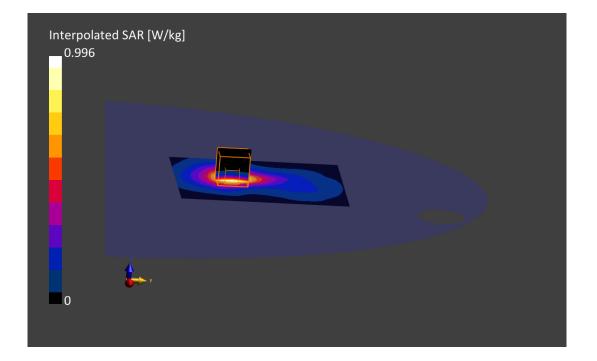




## 3. UNII-2C - 802.11ac80, CH122, Aux Antenna – Left Edge - Skycross

Model, Manufac	cturer	Dimensions [	mm] II	MEI	DUT Typ	e	
AX204D2W, IN	ITEL	40.0 x 70.0 x	1.0 C	8CB9E88C331	Module		
Exposure Co	nditions						
Phantom Section, TSL	Position, Te Distance [mr		Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, MSL	EDGE LEFT, 19.00	WLAN 5GHz	WLAN, 10402-AAE	5610.0, 122	4.3	5.52	44.4
lardware Set	up						
Phantom	-	TSL, Measure	ed Date	Probe, Calib	oration Date	DAE, Calibr	ation Date
ELI V8.0 (20de 2124	g probe tilt) -	MBBL-600-60	00, 2022-Apr-04	EX3DV4 - SM	N7604, 2021-08-16	DAE4 Sn162	28, 2021-08-06
Scan Setup					nent Results	_	
		Area Scan	Zoom Sca		Are	a Scan	Zoom Scan
Grid Extents [m	nm] 10	00.0 x 120.0	22.0 x 22.0 x 22.	0 Date	2022-04-05	5, 12:41 2	022-04-05, 12:51

Grid Extents [mm]	100.0 x 120.0	22.0 x 22.0 x 22.0	Date	2022-04-05, 12:41	2022-04-05, 12:51
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4	psSAR1g [W/Kg]	0.284	0.293
Sensor Surface	3.0	1.4	psSAR10g	0.118	0.121
[mm]			[W/Kg]		
Graded Grid	Yes	Yes	Power Drift [dB]	-0.20	-0.20
Grading Ratio	1.5	1.4	Power Scaling	Disabled	Disabled
MAIA	Confirmed by MAIA	Confirmed by MAIA	Scaling Factor		
Surface Detection	VMS + 6p	VMS + 6p	[dB]		
Scan Method	Measured	Measured	TSL Correction	Positive Only	Positive Only





## 4. UNII-3 - 802.11ac80, CH138, Aux Antenna – Left Edge - Skycross

#### **Device under Test Properties**

	Model, Manufacturer	Dimensions [mm]	IMEI	DUT Type				
	AX204D2W, INTEL	40.0 x 70.0 x 1.0	C8CB9E88C331	Module				
	Exposure Conditions							

#### Exposure Conditions

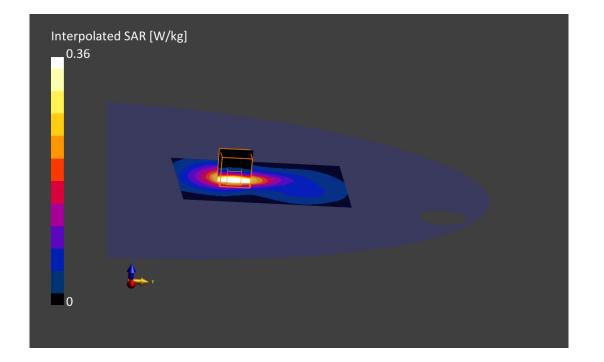
Phantom Section, TSL	Position, Test Distance [mm]	Band	Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, MSL	EDGE LEFT, 19.00	WLAN 5GHz	WLAN, 10402-AAE	5690.0, 138	4.3	5.64	44.3

#### Hardware Setup

Phantom	TSL, Measured Date	Probe, Calibration Date	DAE, Calibration Date
ELI V8.0 (20deg probe tilt) -	MBBL-600-6000, 2022-Apr-04	EX3DV4 - SN7604, 2021-08-16	DAE4 Sn1628, 2021-08-06
2124			

#### Scan Setup

Scan Setup	Measurement Results						
•	Area Scan	Zoom Scan		Area Scan	Zoom Scan		
Grid Extents [mm]	100.0 x 120.0	22.0 x 22.0 x 22.0	Date	2022-04-05, 12:59	2022-04-05, 13:09		
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4	psSAR1g [W/Kg]	0.273	0.286		
Sensor Surface [mm]	3.0	1.4	psSAR10g [W/Kg]	0.115	0.121		
Graded Grid	Yes	Yes	Power Drift [dB]	-0.21	-0.19		
Grading Ratio MAIA Surface Detection	1.5 Confirmed by MAIA VMS + 6p	1.4 Confirmed by MAIA VMS + 6p	Power Scaling Scaling Factor [dB]	Disabled	Disabled		
Scan Method	Measured	Measured	TSL Correction	Positive Only	Positive Only		

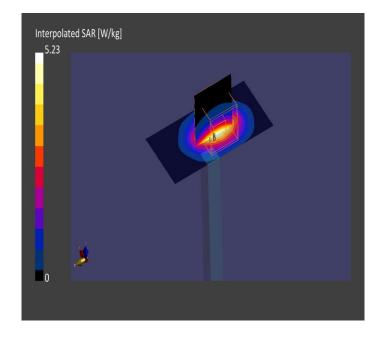


## intel

Rev. 00

## 5. System Check Body Liquid 2450.0MHz

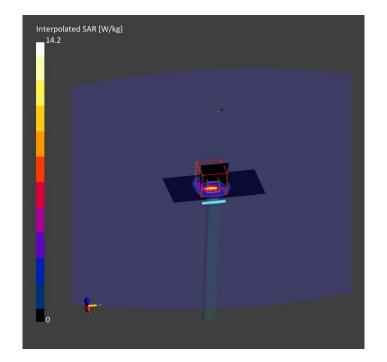
Name, Manufactu	Name, Manufacturer Di		[mm] Se	rial Number	DUT Typ	DUT Type	
D2.45GHzV2, SP	EAG	50.0 x 10.0 x	8.0 93	7	Validation Dipole		
Exposure Con	ditions						
Phantom Section, TSL	Position, Te Distance [mr		Group, UID		Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat				2450.0	8.26	1.93	51.3
Hardware Setu	in						
Phantom ELI V8.0 (20deg p	•	TSL, Measu MBBL-600-6	red Date 000 2022-Apr-07	Probe, Calibrati EX3DV4 - SN760		DAE, Calil DAE4 Sn1	628
Phantom	•			•	04		
Phantom ELI V8.0 (20deg p	•			EX3DV4 - SN760	o4 nt Results		
Phantom ELI V8.0 (20deg p	brobe tilt)2124	MBBL-600-6	000 2022-Apr-07	EX3DV4 - SN760	o4 nt Results	DAE4 Sn1	628
Phantom ELI V8.0 (20deg p Scan Setup Grid Extents [mm] Grid Steps [mm]	n]	MBBL-600-6 Area Scan 40.0 10.0	000 2022-Apr-07 <b>Zoom Scan</b>	EX3DV4 - SN760 Measuremer Date psSAR1g [W/kg	04 ht Results Arc 2022-04-0	DAE4 Sn1 ea Scan 8, 15:20 2.45	628 <b>Zoom Scan</b> 2022-04-08, 15:28 2.42
Phantom ELI V8.0 (20deg p Scan Setup Grid Extents [mr	n]	MBBL-600-6 Area Scan 40.0	000 2022-Apr-07 <b>Zoom Scan</b> 30.030.030.0	EX3DV4 - SN760 Measuremer Date	04 ht Results Arc 2022-04-0	DAE4 Sn1 ea Scan 8, 15:20	628 <b>Zoom Scan</b> 2022-04-08, 15:28
Phantom ELI V8.0 (20deg p Scan Setup Grid Extents [mr Grid Steps [mm] Sensor Surfa	n]	MBBL-600-6 Area Scan 40.0 10.0	000 2022-Apr-07 <b>Zoom Scan</b> 30.030.030.0 5.05.01.5	EX3DV4 - SN760 Measuremen Date psSAR1g [W/kg psSAR10g	04 <b>ht Results</b> 2022-04-0 9]	DAE4 Sn1 ea Scan 8, 15:20 2.45	628 <b>Zoom Scan</b> 2022-04-08, 15:28 2.42
Phantom ELI V8.0 (20deg p Scan Setup Grid Extents [mr Grid Steps [mm] Sensor Surfa [mm]	n] ace Confirm	MBBL-600-6 Area Scan 40.0 10.0 3.0	000 2022-Apr-07 <b>Zoom Scan</b> 30.030.030.0 5.05.01.5 1.4	EX3DV4 - SN760 Measuremer Date psSAR1g [W/kg [W/kg]	04 <b>ht Results</b> 2022-04-0 9] ]	DAE4 Sn1 ea Scan 8, 15:20 2.45 1.12	628 <b>Zoom Sca</b> r 2022-04-08, 15:28 2.42 1.11



## 6. System Check Body Liquid 5300.0MHz

Name, Manufacti	urer	Dim	ensions [m	m] S	erial Number	DUT Typ	Т Туре	
D5.0GHzV2, SPE	AG	50.	0 x 10.0 x 8.	0 1	164	Validation	n Dipole	
Exposure Con	ditions							
Phantom Section, TSL	Position, Distance [		Band	Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, MSL	,			, 0	5300.0, 0	4.7	5.16	44.5
Hardware Setu	р							
Phantom	•	TSI	L, Measured	Date	Probe, Calib	pration Date	DAE, Calibra	ation Date
ELI V8.0 (20deg 2124	probe tilt) ·	- MB	BL-600-6000	) , 2022-Apr-04	EX3DV4 - SI	N7604, 2021-08-16	DAE4 Sn162	8, 2021-08-06
Scan Setup					Measurer	nent Results		
		Are	a Scan	Zoom Sca	n	Are	ea Scan	Zoom Scan

	Area Scan	Zoom Scan		Area Scan	Zoom Scan
Grid Extents [mm]	40.0 x 80.0	22.0 x 22.0 x 22.0	Date	2022-04-06, 08:26	2022-04-06, 08:34
Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4	psSAR1g [W/kg]	3.49	3.71
Sensor Surface	3.0	1.4	psSAR10g	1.01	1.04
[mm]			[W/kg]		
Graded Grid	Yes	Yes	Power Drift [dB]	0.01	0.01
Grading Ratio	1.5	1.4	Power Scaling	Disabled	Disabled
MAIA	Confirmed by MAIA	Confirmed by MAIA	Scaling Factor		
Surface Detection	VMS + 6p	VMS + 6p	[dB]		
Scan Method	Measured	Measured	TSL Correction	Positive Only	Positive Only
Grading Ratio MAIA Surface Detection	1.5 Confirmed by MAIA VMS + 6p	1.4 Confirmed by MAIA VMS + 6p	Power Scaling Scaling Factor [dB]	Disabled	

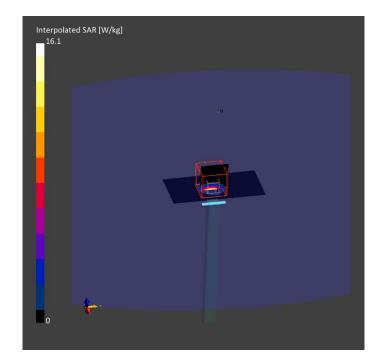




## 7. System Check Body Liquid 5600.0MHz

Name, Manufac	turer	Dimensions [	mm] Se	rial Number	DUT Type		
D5.0GHzV2, SP	EAG	50.0 x 10.0 x	8.0 11	64	Validation Dipole		
Exposure Co	nditions						
Phantom Section, TSL	Position, Te Distance [mn		Group, UID	Frequency [MHz], Channel Number	Conversion Factor	TSL Conductivity [S/m]	TSL Permittivity
Flat, MSL	,		, 0	5600.0, 0	4.3	5.51	44.4
Hardware Set	up						
Phantom		TSL, Measure	ed Date	Probe, Calibr	ation Date	DAE, Calibi	ration Date
ELI V8.0 (20de 2124	g probe tilt) -	MBBL-600-60	00, 2022-Apr-04	EX3DV4 - SN	7604, 2021-08-16	DAE4 Sn16	28, 2021-08-06
Scan Setup				Measurem	ent Results		
		Area Scan	Zoom Scan		Are	a Scan	Zoom Scar
Grid Extents [m	nm]	40.0 x 80.0	22.0 x 22.0 x 22.0	Date	2022-04-06	6, 08:11 2	2022-04-06, 08:19
Grid Steps Imn	nl	$10.0 \times 10.0$	40x40x14	nsSAR1a [W	//kal	3 64	3 91

Grid Steps [mm]	10.0 x 10.0	4.0 x 4.0 x 1.4	psSAR1g [W/kg]	3.64	3.93
Sensor Surface	3.0	1.4	psSAR10g	1.04	1.09
[mm]			[W/kg]		
Graded Grid	Yes	Yes	Power Drift [dB]	0.04	0.03
Grading Ratio	1.5	1.4	Power Scaling	Disabled	Disabled
MAIA	Confirmed by MAIA	Confirmed by MAIA	Scaling Factor		
Surface Detection	VMS + 6p	VMS + 6p	[dB]		
Scan Method	Measured	Measured	TSL Correction	Positive Only	Positive Only



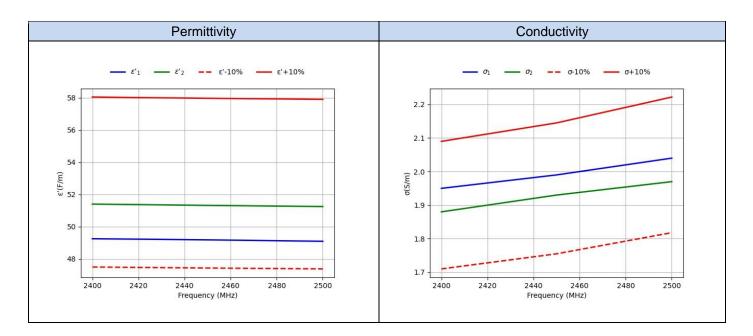




# Annex D. TSL Dielectric Parameters

## D.1 Body DTS 2450MHz

Freq.(MHz)	Target		Meas 2022-		Measured 2022-04-07	
	ε'(F/m)	σ(S/m)	ε'1(F/m)	σ1(S/m)	ε'2(F/m)	σ2(S/m)
2400	52.77	1.90	49.25	1.95	51.40	1.88
2450	52.70	1.95	49.18	1.99	51.32	1.93
2500	52.64	2.02	49.09	2.04	51.25	1.97



## D.2 Body 5180MHz-5900MHz

Freq.(MHz)	Target			sured 04-04	Measured 2022-04-07	
	ε'(F/m)	σ(S/m)	ε'1(F/m)	σ1(S/m)	ε'2(F/m)	σ2(S/m)
5100	49.15	5.18	44.76	4.85	46.69	5.04
5150	49.08	5.24	44.68	4.92	46.59	5.12
5200	49.01	5.30	44.60	5.00	46.51	5.20
5250	48.95	5.36	44.54	5.09	46.43	5.28
5300	48.88	5.42	44.50	5.16	46.36	5.36
5350	48.81	5.47	44.47	5.23	46.28	5.44
5400	48.74	5.53	44.45	5.30	46.19	5.51
5450	48.67	5.59	44.42	5.35	46.11	5.56
5500	48.61	5.65	44.42	5.40	46.03	5.62
5550	48.54	5.71	44.41	5.44	45.95	5.68
5600	48.47	5.77	44.41	5.51	45.84	5.74
5650	48.40	5.82	44.35	5.58	45.75	5.81
5700	48.34	5.88	44.25	5.66	45.63	5.88
5750	48.27	5.94	44.14	5.74	45.51	5.95
5800	48.20	6.00	44.00	5.82	45.41	6.01
5850	48.13	6.06	43.84	5.89	45.30	6.08
5900	48.06	6.12	43.67	5.97	45.18	6.15



## Test Report N° 220225-03.TR12



