



TEST REPORT



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1. Report No : DRRFCC1906-0055(2)
2. Customer
 - Name : SystemBase Co., Ltd.
 - Address : Daerung Post Tower-1 16F, 288, Digital-ro, Guro-gu, Seoul, South Korea
3. Use of Report : FCC Original Grant
4. Product Name / Model Name : Bluetooth USB Adapter / TALUS
FCC ID : PROTALUS2
5. Test Method Used : CFR §2.1093
6. Date of Test : 2019-05-20 ~ 2019-05-21
7. Testing Environment : See appended test report
8. Test Result : Refer to the attached Test Result

Affirmation	Tested by	Technical Manager
	Name : BumJun Park 	Name : HakMin Kim  (Signature)

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2019 .06 .18 .

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Test Report Version

Test Report No.	Date	Description
DRRFCC1906-0055	Jun. 05, 2019	Initial issue
DRRFCC1906-0055(1)	Jun. 11, 2019	Revise of Section 1.1, 1.5, 7.2
DRRFCC1906-0055(2)	Jun. 18, 2019	Revise of Section 1.1, 9.1

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1. DESCRIPTION OF DEVICE

Environmental evaluation measurements of specific absorption rate (SAR) distributions in emulated human head tissues exposed to radio frequency (RF) radiation from wireless portable devices for compliance with the rules and regulations of the U.S. Federal Communications Commission (FCC).

General Information

EUT type	Bluetooth USB Adapter		
FCC ID	PROTALUS2		
Equipment model name	TALUS		
Equipment add model name	N/A		
Equipment serial no.	Identical prototype		
Mode(s) of Operation	Bluetooth		
TX Frequency Range	Band	Mode	Frequency
	DSS	Bluetooth	2402 ~ 2480 MHz
RX Frequency Range	DSS	Bluetooth	2402 ~ 2480 MHz
Band	Mode	Channel	Reported SAR
			1g SAR (W/kg)
			Body
DSS	Bluetooth	39	0.515
FCC Equipment Class	Part 15 Spread Spectrum Transmitter(DSS)		
Date(s) of Tests	2019-05-20 ~ 2019-05-21		
Antenna Type	External Type Antenna		
Functions	<ul style="list-style-type: none"> Bluetooth (2.4GHz) is supported. 		

1.1 Guidance Applied

- IEEE 1528-2013
- IEC 62209-1 2016
- FCC KDB Publication 447498 D01v06 (General RF Exposure Guidance)
- FCC KDB Publication 447498 D02 (SAR Procedures for Dongle Xmtr v02r01)
- FCC KDB Publication 690783 D01 (SAR Listings on Grants v01r03)
- FCC KDB Publication 865664 D01 (SAR Measurement 100 MHz to 6 GHz v01r04)
- FCC KDB Publication 865664 D02 (RF Exposure Reporting v01r02)
- April 2019 TCB Workshop Note (RF Exposure Panel)

1.2 Device Overview

Band	Mode	Operating Modes	Tx Frequency
DSS	Bluetooth	Data	2402 ~ 2480 MHz

1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

Band& Mode			Modulated Frame Average[dBm]		
			Ch. Low	Ch. Mid	Ch. High
DSS	Bluetooth 1Mbps	Maximum	8.5	11.0	11.5
		Nominal	7.5	10.0	10.5
		Minimum	6.5	9.0	9.5
	Bluetooth 2Mbps	Maximum	0.5	3.0	4.0
		Nominal	-0.5	2.0	3.0
		Minimum	-1.5	1.0	2.0
	Bluetooth 3Mbps	Maximum	0.5	3.5	4.0
		Nominal	-0.5	2.5	3.0
		Minimum	-1.5	1.5	2.0
	LE	Maximum	-2.0	1.5	2.5
		Nominal	-3.0	0.5	1.5
		Minimum	-4.0	-0.5	0.5

1.4 DUT Antenna Locations



R-AN2400-1901RS

R-AN2400-5801RS

AN2400-3306RS

Note(s):

1. Exact antenna dimensions and separation distances are shown in the "(TALUS)_Manual.pdf" in the FCC Filing.

1.5 Power Reduction for SAR

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

1.6 Device Serial Numbers

Band & Mode	Serial Number
Bluetooth	FCC #1

2. INTROCUCTION

The FCC and Industry Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996 and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices.

The FCC has adopted the guidelines for evaluating the environmental effects of radio frequency radiation in ET Docket 93-62 on Aug. 6, 1996 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95*.1-2005 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz. 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017. The measurement procedure described in IEEE/ANSI C95.3-1992 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave is used for guidance in measuring SAR due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in Biological Effects and Exposure Criteria for Radio frequency Electromagnetic Fields," NCRP Report No. 86 NCRP, 1986, Bethesda, MD 20814. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ) It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Fig. 2.1)

$$SAR = \frac{d}{dt} \left(\frac{dU}{dm} \right) = \frac{d}{dt} \left(\frac{dU}{\rho dv} \right)$$

Fig. 2.1 SAR Mathematical Equation

SAR is expressed in units of Watts per Kilogram (W/kg).

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

where:

- σ = conductivity of the tissue-simulating material (S/m)
- ρ = mass density of the tissue-simulating material (kg/m^3)
- E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relations to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.

3. DESCRIPTION OF TEST EQUIPMENT

3.1 SAR MEASUREMENT SETUP

Measurements are performed using the DASY5 automated dosimetric assessment system. The DASY5 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland and consists of high precision robotics system (Staubli), robot controller, desktop computer, near-field probe, probe alignment sensor, and the generic twin phantom containing the muscle equivalent material. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF) (see Fig. 3.1).

A cell controller system contains the power supply, robot controller each pendant (Joystick), and a remote control used to drive the robot motors. The PC consists of the Intel Core i7-2600 3.40 GHz desktop computer with Windows 7 system and SAR Measurement Software DASY5, A/D interface card, monitor, mouse, and keyboard. The StaubliRobotis connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit that performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical in to digital electric signal of the DAE and transfers data to the PC plug-in card.

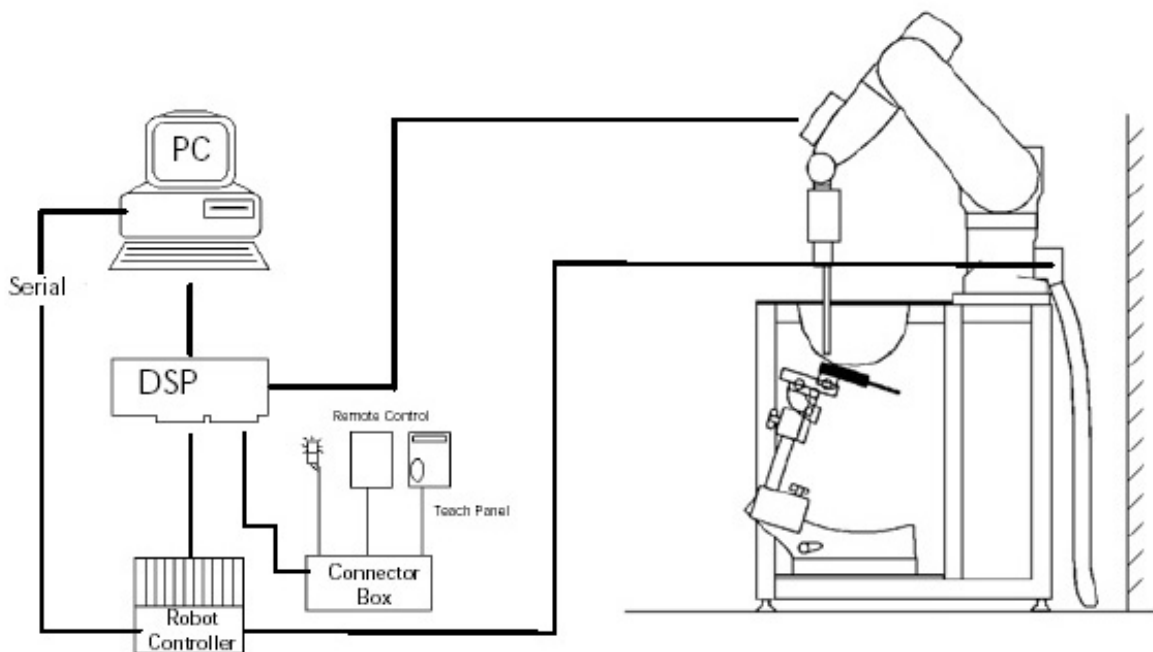


Figure 3.1 SAR Measurement System Setup

The DAE3 consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the PC-card is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe mounting device includes two different sensor systems for frontal and sidewise probe contacts. They are also used for mechanical surface detection and probe collision detection. The robot uses its own controller with a built in VME-bus computer. The system is described in detail.

3.2 Probe Specification

Calibration	In air from 4 MHz to 10 GHz In brain and muscle simulating tissue at Frequencies of 2450 MHz, 2600 MHz, 3500 MHz, 3700 MHz, 5200 MHz, 5300 MHz, 5500 MHz, 5600 MHz, 5800 MHz
Frequency	4 MHz to 10 GHz
Linearity	± 0.2 dB(30 MHz to 10 GHz)
Dynamic	10 µW/g to > 100 mW/g
Range	Linearity : ±0.2 dB
Dimensions	Overall length : 337 mm
Tip length	20 mm
Body diameter	12 mm
Tip diameter	2.5 mm
Distance from probe tip to sensor center	1.0 mm
Application	SAR Dosimetry Testing Compliance tests of mobile phones

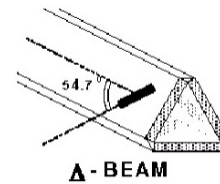


Figure 3.2 Triangular Probe Configurations



Figure 3.3 Probe Thick-Film Technique



DAE System

The SAR measurements were conducted with the dosimetric probe EX3DV4 designed in the classical triangular configuration(see Fig. 3.2) and optimized for dosimetric evaluation. The probe is constructed using the thick film technique; with printed resistive lines on ceramic substrates. The probe is equipped with an optical multitier line ending at the front of the probe tip. It is connected to the EOC box on the robot arm and provides an automatic detection of the phantom surface. Half of the fibers are connected to a pulsed infrared transmitter, the other half to a synchronized receiver. As the probe approaches the surface, the reflection from the surface produces a coupling from the transmitting to the receiving fibers. This reflection increases first during the approach, reaches maximum and then decreases. If the probe is flatly touching the surface, the coupling is zero. The distance of the coupling maximum to the surface is independent of the surface reflectivity and largely independent of the surface to probe angle. The DASY5 software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped at reaching the maximum.

3.3 Probe Calibration Process

3.3.1 E-Probe Calibration

Dosimetric Assessment Procedure

Each probe is calibrated according to a dosimetric assessment procedure with accuracy better than +/- 10%. The spherical isotropy was evaluated with the procedure and found to be better than +/-0.25dB. The sensitivity parameters (Norm X, Norm Y, Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe is tested.

Free Space Assessment

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies below 1 GHz, and in a waveguide above 1GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity at the proper orientation with the field. The probe is then rotated 360 degrees.

Temperature Assessment *

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium, correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent the remits or based temperature probe is used in conjunction with the E-field probe.

$$SAR = C \frac{\Delta T}{\Delta t}$$

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

where:

where:

Δt = exposure time (30 seconds),

σ = simulated tissue conductivity,

C = heat capacity of tissue (brain or muscle),

ρ = Tissue density (1.25 g/cm³ for brain tissue)

ΔT = temperature increase due to RF exposure.

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. Now it's possible to quantify the electric field in the simulated tissue by equating the thermally derived SAR to the E- field;

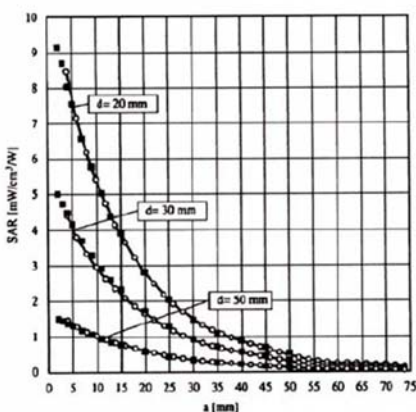


Figure 3.4 E-Field and Temperature Measurements at 900MHz

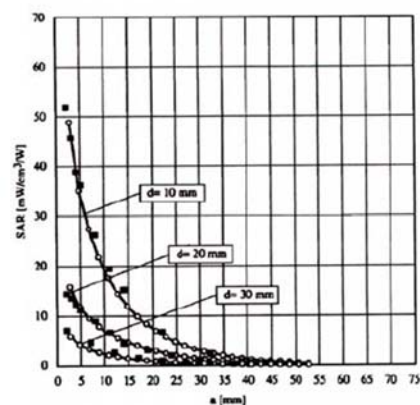


Figure 3.5 E-Field and Temperature Measurements at 1800MHz

3.4 Data Extrapolation

The DASY5 software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given like below;

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i (i=x,y,z)
 U_i = input signal of channel i (i=x,y,z)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:

$$E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with V_i = compensated signal of channel i (i = x,y,z)
 $Norm_i$ = sensor sensitivity of channel i (i = x,y,z)
 $\mu V/(V/m)^2$ for E-field probes
 ConvF = sensitivity of enhancement in solution
 E_i = electric field strength of channel i in V/m

The RSS value of the field components gives the total field strength (Hermetian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.

$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

with SAR = local specific absorption rate in W/g
 E_{tot} = total field strength in V/m
 σ = conductivity in [mho/m] or [Siemens/m]
 ρ = equivalent tissue density in g/cm³

The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{free} = \frac{E_{tot}^2}{3770}$$

with P_{pwe} = equivalent power density of a plane wave in W/cm²
 E_{tot} = total electric field strength in V/m

3.5 ELI 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.

Reference markings on the Phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points in the robot. (see Fig. 3.6)



Figure 3.6 ELI Phantom

ELI Phantom Specification:

Construction	ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure. ELI V6.0, released in August 2014, has the same shell geometry as ELI4 but offers increased long term stability. 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 liquid depth is maintained at a minimum depth of 15cm to minimize reflections from the upper surface.
Shell Thickness	2.0 ± 0.2 mm
Filling Volume	Approx. 30 liters
Dimensions	Major axis: 600 mm Minor axis: 400 mm

3.6 Device Holder for Transmitters

In combination with the Twin SAM Phantom V4.0/V4.0c, V5.0 or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).

Note: A simulating human hand is not used due to the complex anatomical and geometrical structure of the hand that may produce infinite number of configurations. To produce the worst-case condition (the hand absorbs antenna output power), the hand is omitted during the tests.



Figure 3.8 Mounting Device

3.7 Brain Simulation Mixture Characterization

The brain mixtures consist of a viscous gel using hydrox-ethylcellulose (HEC) gelling agent and saline solution (see Table 3.1). Preservation with a bactericide is added and visual inspection is made to make sure air bubbles are not trapped during the mixing process. The mixture is calibrated to obtain proper dielectric constant (permittivity) and conductivity of the desired tissue. The mixture characterizations used for the brain tissue simulating liquids are according to the data by C. Gabriel and G. Harts grove



Figure 3.9 Simulated Tissue

Table3.1 Composition of the Tissue Equivalent Matter

Ingredients (% by weight)	Frequency (MHz)
	2450
Tissue Type	Head
Water	71.88
Salt (NaCl)	0.160
Sugar	-
HEC	-
Bactericide	-
Triton X-100	19.97
DGBE	7.990
Diethylene glycol hexyl ether	-
Polysorbate (Tween) 80	-
Target for Dielectric Constant	39.2
Target for Conductivity (S/m)	1.80

Salt:	99 % Pure Sodium Chloride	Sugar:	98 % Pure Sucrose
Water:	De-ionized, 16M resistivity	HEC:	Hydroxyethyl Cellulose
DGBE:	99 % Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy) ethanol]		
Triton X-100(ultra pure):	Polyethylene glycol mono[4-(1,1,3,3-tetramethylbutyl)phenyl] ether		

3.8 SAR TEST EQUIPMENT

Table 3.2 Test Equipment Calibration

	Type	Manufacturer	Model	Cal.Date	Next.Cal.Date	S/N
<input checked="" type="checkbox"/>	SEMITEC Engineering	SEMITEC	N/A	N/A	N/A	Shield Room
<input checked="" type="checkbox"/>	Robot	SPEAG	TX60L	N/A	N/A	F12/5LP5A1/A/01
<input checked="" type="checkbox"/>	Robot Controller	SPEAG	CS8C	N/A	N/A	F12/5LP5A1/C/01
<input checked="" type="checkbox"/>	Joystick	SPEAG	N/A	N/A	N/A	S-12030401
<input checked="" type="checkbox"/>	IntelCorei7-2600 3.40 GHz Windows 7 Professional	N/A	N/A	N/A	N/A	N/A
<input checked="" type="checkbox"/>	Probe Alignment Unit LB	N/A	N/A	N/A	N/A	SE UKS 030 AA
<input checked="" type="checkbox"/>	Mounting Device	SPEAG	SD000H01KA	N/A	N/A	N/A
<input checked="" type="checkbox"/>	2mm Oval Phantom ELI5	SPEAG	QDOVA002AA	N/A	N/A	1166
<input checked="" type="checkbox"/>	Data Acquisition Electronics	SPEAG	DAE3V1	2019-01-24	2020-01-24	519
<input checked="" type="checkbox"/>	Dosimetric E-Field Probe	SPEAG	EX3DV4	2018-07-26	2019-07-26	3930
<input checked="" type="checkbox"/>	2450 MHz SAR Dipole	SPEAG	D2450V2	2018-08-24	2020-08-24	920
<input checked="" type="checkbox"/>	Network Analyzer	Agilent	E5071C	2018-12-19	2019-12-19	MY46111534
<input checked="" type="checkbox"/>	Signal Generator	Agilent	E4438C	2018-07-04	2019-07-04	US41461520
<input checked="" type="checkbox"/>	Amplifier	EMPOWER	BBS3Q7ELU	2018-07-10	2019-07-10	1020
<input checked="" type="checkbox"/>	Power Meter	HP	EPM-442A	2018-12-19	2019-12-19	GB37170267
<input checked="" type="checkbox"/>	Power Meter	Anritsu	ML2495A	2018-07-04	2019-07-04	1435003
<input checked="" type="checkbox"/>	Power Sensor	Anritsu	MA2490A	2018-07-04	2019-07-04	1409034
<input checked="" type="checkbox"/>	Power Sensor	HP	8481A	2018-12-19	2019-12-19	3318A96566
<input checked="" type="checkbox"/>	Power Sensor	HP	8481A	2018-12-19	2019-12-19	2702A65976
<input checked="" type="checkbox"/>	Dual Directional Coupler	HP	772D	2018-07-03	2019-07-03	2889A01064
<input checked="" type="checkbox"/>	Low Pass Filter 3.0GHz	Micro LAB	LA-30N	2018-07-05	2019-07-05	N/A
<input checked="" type="checkbox"/>	Attenuators (10 dB)	WEINSCHTEL	23-10-34	2018-12-19	2019-12-19	BP4387
<input checked="" type="checkbox"/>	Dielectric Probe kit	SPEAG	DAK-3.5	2018-11-20	2019-11-20	1092

NOTE: The E-field probe was calibrated by SPEAG, by temperature measurement procedure. Dipole Verification measurement is performed by DT&C before each test. The muscle simulating material is calibrated by DT&C using the dielectric probe system and network analyzer to determine the conductivity and permittivity (dielectric constant) of the muscle-equivalent material. Each equipment item was used solely within its respective calibration period.

4. TEST SYSTEM SPECIFICATIONS

Automated TEST SYSTEM SPECIFICATIONS:

Positioner

Robot	StäubliUnimation Corp. Robot Model: TX60L
Repeatability	0.02 mm
No. of axis	6

Data Acquisition Electronic (DAE) System

Cell Controller

Processor	IntelCorei7-2600
Clock Speed	3.40 GHz
Operating System	Windows 7 Professional
Data Card	DASY5 PC-Board

Data Converter

Features	Signal, multiplexer, A/D converter. & control logic
Software	DASY5
Connecting Lines	Optical downlink for data and status info Optical uplink for commands and clock

PC Interface Card

Function	24 bit (64 MHz) DSP for real time processing Link to DAE 3 16 bit A/D converter for surface detection system serial link to robot direct emergency stop output for robot
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E-Field Probes

Model	EX3DV4 S/N: 3930
Construction	Triangular core fiber optic detection system
Frequency	4 MHz to 10 GHz
Linearity	± 0.2 dB (30 MHz to 10 GHz)

Phantom

Phantom	2mm Oval Phantom ELI5
Shell Material	Composite
Thickness	2.0 ± 0.2 mm

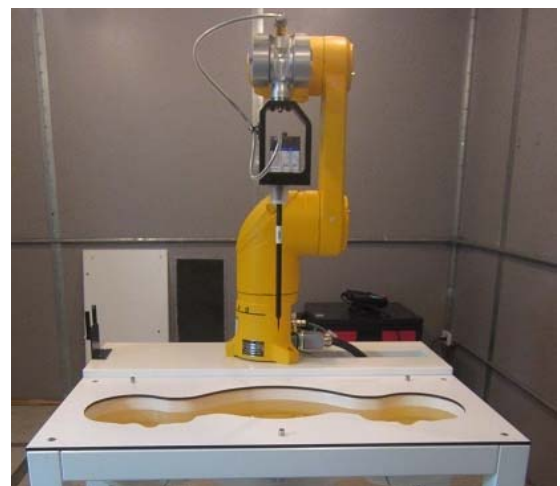


Figure 4.1 DASY5 Test System

5. SAR MEASUREMENT PROCEDURE

5.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

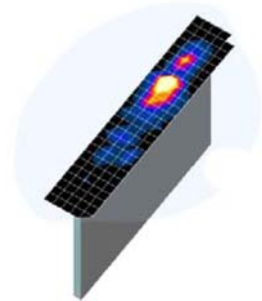


Figure 5.1
Sample SAR Area Scan

1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 5-1) and IEEE1528-2013.
2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.
3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 5-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the DASY manual online for more details):
 - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
 - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the “Not a knot” condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
 - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was found.
4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{area}, \Delta y_{area}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{zoom}, \Delta y_{zoom}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid	Graded Grid		
			$\Delta z_{zoom}(n)$	$\Delta z_{zoom}(1)^*$	$\Delta z_{zoom}(n>1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	$\leq 1.5 * \Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	$\leq 1.5 * \Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	$\leq 1.5 * \Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	$\leq 1.5 * \Delta z_{zoom}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	$\leq 1.5 * \Delta z_{zoom}(n-1)$	≥ 22

Table 5.1 Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04*

*Also compliant to IEEE 1528-2013 Table 6

6. RF EXPOSURE LIMITS

Uncontrolled Environment:

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Controlled Environment:

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Table 6.1.SAR Human Exposure Specified in ANSI/IEEE C95.1-1992

	HUMAN EXPOSURE LIMITS	
	General Public Exposure (W/kg) or (mW/g)	Occupational Exposure (W/kg) or (mW/g)
SPATIAL PEAK SAR * (Brain)	1.60	8.00
SPATIAL AVERAGE SAR ** (Whole Body)	0.08	0.40
SPATIAL PEAK SAR *** (Hands / Feet / Ankle / Wrist)	4.00	20.0

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e.as a result of employment or occupation).

7. FCC MEASUREMENT PROCEDURES

7.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, When SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported SAR. The highest reported SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

7.2 DONGLES WITH EXTERNAL, SWIVEL OR ROTATING ANTENNAS

For dongles with external antennas or antennas that may swivel or rotate, a KDB inquiry should be submitted to the FCC Laboratory to determine the applicable test configurations. The inquiry should identify if the antenna may transmit in its stowed position, and if a swivel or rotating USB connector is also used. Depending on the antenna configurations used in the individual dongle design and its operating configurations, different test separation distances may apply and must be determined on a case-by-case basis.

8. RF CONDUCTED POWERS

8.1 Bluetooth Conducted Powers

Channel	Frequency (MHz)	Frame AVG Output Power (1Mbps)		Frame AVG Output Power (2Mbps)		Frame AVG Output Power (3Mbps)	
		(dBm)	(mW)	(dBm)	(mW)	(dBm)	(mW)
Low	2402	8.13	6.50	10.58	11.43	11.37	13.71
Mid	2441	0.32	1.08	2.95	1.97	3.71	2.35
High	2480	0.39	1.09	3.02	2.00	3.75	2.37

Table 8.1 Bluetooth Frame Average RF Power

Channel	Frequency (MHz)	Frame AVG Output Power (LE)	
		(dBm)	(mW)
Low	2402	-2.21	0.60
Mid	2440	1.30	1.35
High	2480	2.39	1.73

Table 8.2 LE Frame Average RF Power

● Bluetooth Conducted Powers procedures

1. Bluetooth (BDR, EDR)
 - 1) When EUT operating, The EUT is transmitting at maximum power level and duty cycle fixed.
 - 2) Measurement equipment and EUT were connected like Figure 8.1
 - 3) The maximum output powers of BDR(1 Mbps), EDR(2, 3 Mbps) and each frequency were set by a CSR Test PC.
 - 4) Power levels were measured by a Power Meter.

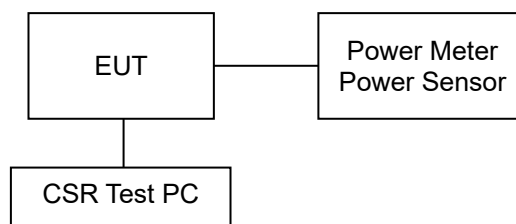


Figure 8.1 Average Power Measurement Setup

The average conducted output powers of Bluetooth were measured using above test setup and a wideband RF power meter when the EUT is transmitting at its maximum power level and duty cycle fixed.

9. SYSTEM VERIFICATION

9.1 Tissue Verification

MEASURED TISSUE PARAMETERS										
Date(s)	Tissue Type	Ambient Temp.[°C]	Liquid Temp.[°C]	Measured Frequency [MHz]	Target Dielectric Constant, ϵ_r	Target Conductivity, σ (S/m)	Measured Dielectric Constant, ϵ_r	Measured Conductivity, σ (S/m)	Er Deviation [%]	σ Deviation [%]
May.20. 2019	2450 Head	21.6	21.7	2402	39.282	1.757	39.169	1.808	-0.29	2.87
				2441	39.215	1.792	39.032	1.853	-0.47	3.40
				2450	39.200	1.800	38.998	1.863	-0.52	3.50
				2480	39.160	1.832	38.885	1.897	-0.70	3.55
May.21 2019	2450 Head	21.2	21.4	2402	39.282	1.757	39.208	1.808	-0.19	2.87
				2441	39.215	1.792	39.072	1.853	-0.37	3.40
				2450	39.200	1.800	39.039	1.864	-0.41	3.56
				2480	39.160	1.832	38.922	1.898	-0.61	3.60

Note1 : The above measured tissue parameters were used in the DASY software. The DASY software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB 865664 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Note2 : The Head Tissue was applied with reference to April 2019 TCB Workshop Note (RF Exposure Panel).

Measurement Procedure for Tissue verification:

- 1) The network analyzer and probe system was configured and calibrated.
- 2) The probe was immersed in the sample which was placed in a nonmetallic container. Trapped air bubbles beneath the flange were minimized by placing the probe at a slight angle.
- 3) The complex admittance with respect to the probe aperture was measured
- 4) The complex relative permittivity , for example from the below equation (Pournaropoulos and Misra):

$$Y = \frac{j2\omega\epsilon_r\epsilon_0}{[\ln(b/a)]^2} \int_a^b \int_a^b \int_0^\pi \cos\phi' \frac{\exp[-j\omega r(\mu_0\epsilon_r'\epsilon_0)^{1/2}]}{r} d\phi'd\rho'd\rho$$

where Y is the admittance of the probe in contact with the sample, the primed and unprimed coordinates refer to source and observation points, respectively, $r^2 = \rho^2 + \rho'^2 - 2\rho\rho'\cos\phi'$, ω is the angular frequency, and $j = \sqrt{-1}$.

9.2 Test System Verification

Prior to assessment, the system is verified to the $\pm 10\%$ of the specifications at 2450 MHz by using the SAR Dipole kit(s). (Graphic Plots Attached)

SYSTEM DIPOLE VERIFICATION TARGET & MEASURED												
SAR System #	Freq. [MHz]	SAR Dipole kits	Date(s)	Tissue Type	Ambient Temp.[°C]	Liquid Temp.[°C]	Probe S/N	Input Power (mW)	1 W Target SAR _{1g} (W/kg)	Measured SAR _{1g} (W/kg)	1 W Normalized SAR _{1g} (W/kg)	Deviation [%]
A	2450	D2450V2, SN: 920	May.20. 2019	Head	21.6	21.7	3930	100	51.90	50.80	5.08	-2.12
A	2450	D2450V2, SN: 920	May.21. 2019	Head	21.2	21.4	3930	100	51.90	50.40	5.08	-2.89

Note1 : System Verification was measured with input 100 mW and normalized to 1W.

Note2 : To confirm the proper SAR liquid depth, the z-axis plots from the system verifications were included since the system verifications were performed using the same liquid, probe and DAE as the SAR tests in the same time period.

Note3: Full system validation status and results can be found in Attachment 3.

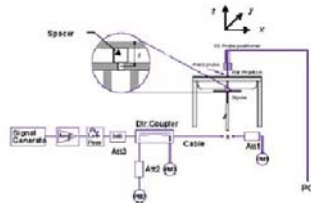


Figure 9.1 Dipole Verification Test Setup Diagram & Photo

10. SAR TEST RESULTS

10.1 Body SAR Results

Table 10.1.1 Bluetooth Body SAR– R-AN2400-1901RS Ant.

MEASUREMENT RESULTS												
FREQUENCY		Mode	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Drift Power [dB]	Phantom Position	Device Serial Number	Data Rate [Mbps]	1g SAR (W/kg)	Scaling Factor	SAR (W/kg)	Plots #
MHz	Ch											
2441	39	Bluetooth	11.00	10.58	-0.040	5 mm [H-Down #1]	FCC #1	1	0.378	1.102	0.417	
2441	39	Bluetooth	11.00	10.58	-0.030	5 mm [H-Down #2]	FCC #1	1	0.391	1.102	0.431	
2441	39	Bluetooth	11.00	10.58	-0.020	5 mm [H-Down #3]	FCC #1	1	0.359	1.102	0.396	
2441	39	Bluetooth	11.00	10.58	-0.040	5 mm [H-Down #4]	FCC #1	1	0.353	1.102	0.389	
2441	39	Bluetooth	11.00	10.58	0.100	5 mm [H-Up #1]	FCC #1	1	0.467	1.102	0.515	A1
2441	39	Bluetooth	11.00	10.58	0.020	5 mm [H-Up #2]	FCC #1	1	0.420	1.102	0.463	
2441	39	Bluetooth	11.00	10.58	0.060	5 mm [H-Up #3]	FCC #1	1	0.433	1.102	0.477	
2441	39	Bluetooth	11.00	10.58	0.080	5 mm [H-Up #4]	FCC #1	1	0.433	1.102	0.477	
2441	39	Bluetooth	11.00	10.58	-0.040	5 mm [V-Back #1]	FCC #1	1	0.200	1.102	0.220	
2441	39	Bluetooth	11.00	10.58	0.010	5 mm [V-Back #2]	FCC #1	1	0.185	1.102	0.204	
2441	39	Bluetooth	11.00	10.58	0.000	5 mm [V-Back #3]	FCC #1	1	0.176	1.102	0.194	
2441	39	Bluetooth	11.00	10.58	0.020	5 mm [V-Back #4]	FCC #1	1	0.195	1.102	0.215	
2441	39	Bluetooth	11.00	10.58	-0.100	5 mm [V-Front #1]	FCC #1	1	0.226	1.102	0.249	
2441	39	Bluetooth	11.00	10.58	-0.090	5 mm [V-Front #2]	FCC #1	1	0.215	1.102	0.237	
2441	39	Bluetooth	11.00	10.58	-0.070	5 mm [V-Front #3]	FCC #1	1	0.236	1.102	0.260	
2441	39	Bluetooth	11.00	10.58	-0.050	5 mm [V-Front #4]	FCC #1	1	0.237	1.102	0.261	
ANSI / IEEE C95.1-2005– SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population Exposure								Body 1.6 W/kg (mW/g) averaged over 1 gram				

Table 10.1.2 DSS Body SAR– R-AN2400-5801RS Ant.

MEASUREMENT RESULTS												
FREQUENCY		Mode	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Drift Power [dB]	Phantom Position	Device Serial Number	Data Rate [Mbps]	1g SAR (W/kg)	Scaling Factor	SAR (W/kg)	Plots #
MHz	Ch											
2441	39	Bluetooth	11.00	10.58	-0.010	5 mm [H-Down #1]	FCC #1	1	0.391	1.102	0.431	
2441	39	Bluetooth	11.00	10.58	-0.050	5 mm [H-Down #2]	FCC #1	1	0.327	1.102	0.360	
2441	39	Bluetooth	11.00	10.58	-0.030	5 mm [H-Down #3]	FCC #1	1	0.294	1.102	0.324	
2441	39	Bluetooth	11.00	10.58	-0.050	5 mm [H-Down #4]	FCC #1	1	0.280	1.102	0.309	
2441	39	Bluetooth	11.00	10.58	-0.100	5 mm [H-Down #5]	FCC #1	1	0.186	1.102	0.205	
2441	39	Bluetooth	11.00	10.58	-0.020	5 mm [H-Down #6]	FCC #1	1	0.111	1.102	0.122	
2441	39	Bluetooth	11.00	10.58	0.110	5 mm [H-Down #7]	FCC #1	1	0.058	1.102	0.064	
2441	39	Bluetooth	11.00	10.58	-0.060	5 mm [H-Up #1]	FCC #1	1	0.399	1.102	0.440	A2
2441	39	Bluetooth	11.00	10.58	-0.060	5 mm [H-Up #2]	FCC #1	1	0.388	1.102	0.428	
2441	39	Bluetooth	11.00	10.58	-0.060	5 mm [H-Up #3]	FCC #1	1	0.328	1.102	0.361	
2441	39	Bluetooth	11.00	10.58	-0.050	5 mm [H-Up #4]	FCC #1	1	0.354	1.102	0.390	
2441	39	Bluetooth	11.00	10.58	0.050	5 mm [H-Up #5]	FCC #1	1	0.089	1.102	0.098	
2441	39	Bluetooth	11.00	10.58	-0.110	5 mm [H-Up #6]	FCC #1	1	0.167	1.102	0.184	
2441	39	Bluetooth	11.00	10.58	0.070	5 mm [H-Up #7]	FCC #1	1	0.044	1.102	0.048	
2441	39	Bluetooth	11.00	10.58	0.010	5 mm [V-Back #1]	FCC #1	1	0.183	1.102	0.202	
2441	39	Bluetooth	11.00	10.58	-0.010	5 mm [V-Back #2]	FCC #1	1	0.160	1.102	0.176	
2441	39	Bluetooth	11.00	10.58	0.000	5 mm [V-Back #3]	FCC #1	1	0.141	1.102	0.155	
2441	39	Bluetooth	11.00	10.58	-0.030	5 mm [V-Back #4]	FCC #1	1	0.131	1.102	0.144	
2441	39	Bluetooth	11.00	10.58	-0.040	5 mm [V-Back #6]	FCC #1	1	0.059	1.102	0.065	
2441	39	Bluetooth	11.00	10.58	0.060	5 mm [V-Back #7]	FCC #1	1	0.039	1.102	0.043	
2441	39	Bluetooth	11.00	10.58	-0.000	5 mm [V-Back #8]	FCC #1	1	0.034	1.102	0.037	
2441	39	Bluetooth	11.00	10.58	0.030	5 mm [V-Front #1]	FCC #1	1	0.169	1.102	0.186	
2441	39	Bluetooth	11.00	10.58	0.020	5 mm [V-Front #2]	FCC #1	1	0.183	1.102	0.202	
2441	39	Bluetooth	11.00	10.58	0.050	5 mm [V-Front #3]	FCC #1	1	0.182	1.102	0.201	
2441	39	Bluetooth	11.00	10.58	0.020	5 mm [V-Front #4]	FCC #1	1	0.160	1.102	0.176	
2441	39	Bluetooth	11.00	10.58	-0.140	5 mm [V-Front #5]	FCC #1	1	0.041	1.102	0.045	
2441	39	Bluetooth	11.00	10.58	-0.180	5 mm [V-Front #6]	FCC #1	1	0.175	1.102	0.193	
2441	39	Bluetooth	11.00	10.58	-0.040	5 mm [V-Front #8]	FCC #1	1	0.030	1.102	0.033	
ANSI / IEEE C95.1-2005– SAFETY LIMIT												
Spatial Peak												
Uncontrolled Exposure/General Population Exposure								Body				
								1.6 W/kg (mW/g)				
								averaged over 1 gram				

Table 10.1.3 DSS Body SAR - AN2400-3306RS Ant.

MEASUREMENT RESULTS												
FREQUENCY		Mode	Maximum Allowed Power [dBm]	Conducted Power [dBm]	Drift Power [dB]	Phantom Position	Device Serial Number	Data Rate [Mbps]	1g SAR (W/kg)	Scaling Factor	SAR (W/kg)	Plots #
MHz	Ch											
2441	39	Bluetooth	11.00	10.58	0.070	5 mm [H-Down]	FCC #1	1	0.257	1.102	0.283	A3
2441	39	Bluetooth	11.00	10.58	0.050	5 mm [H-up]	FCC #1	1	0.230	1.102	0.253	
2441	39	Bluetooth	11.00	10.58	0.140	5 mm [V-Back]	FCC #1	1	0.126	1.102	0.139	
2441	39	Bluetooth	11.00	10.58	0.010	5 mm [V-Front]	FCC #1	1	0.138	1.102	0.152	
2441	39	Bluetooth	11.00	10.58	-0.130	5 mm [Tip]	FCC #1	1	0.022	1.102	0.024	
ANSI / IEEE C95.1-2005- SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population Exposure								Body 1.6 W/kg (mW/g) averaged over 1 gram				

10.2 SAR Test Notes

General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
2. Batteries are fully charged at the beginning of the SAR measurements. A standard battery was used for all SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.

11. MEASUREMENT UNCERTAINTIES

2450 MHz Head

Error Description	Uncertainty value $\pm\%$	Probability Distribution	Divisor	(Ci) 1g	(Ci) 10g	Standard (1g)	Standard (10g)	vi 2 or Veff
Measurement System								
Probe calibration	± 6.0	Normal	1	1	1	$\pm 6.0 \%$	$\pm 6.0 \%$	∞
Isotropy	± 1.3	Normal	1	1	1	$\pm 1.3 \%$	$\pm 1.3 \%$	∞
Boundary Effects	± 2.0	Rectangular	$\sqrt{3}$	1	1	$\pm 1.2 \%$	$\pm 1.2 \%$	∞
Probe Linearity	± 0.3	Normal	1	1	1	$\pm 0.3 \%$	$\pm 0.3 \%$	∞
Probe modulation response	± 0.0	Rectangular	$\sqrt{3}$	1	1	$\pm 0.0 \%$	$\pm 0.0 \%$	∞
Detection limits	± 0.25	Rectangular	$\sqrt{3}$	1	1	$\pm 0.14 \%$	$\pm 0.14 \%$	∞
Readout Electronics	± 0.3	Normal	1	1	1	$\pm 0.3 \%$	$\pm 0.3 \%$	∞
Response time	± 0.8	Rectangular	$\sqrt{3}$	1	1	$\pm 0.46 \%$	$\pm 0.46 \%$	∞
Integration time	± 2.6	Rectangular	$\sqrt{3}$	1	1	$\pm 1.5 \%$	$\pm 1.5 \%$	∞
RF Ambient Conditions – Noise	± 3.0	Rectangular	$\sqrt{3}$	1	1	$\pm 1.7 \%$	$\pm 1.7 \%$	∞
RF Ambient Conditions – Reflections	± 3.0	Rectangular	$\sqrt{3}$	1	1	$\pm 1.7 \%$	$\pm 1.7 \%$	∞
Probe Positioner	± 0.8	Rectangular	$\sqrt{3}$	1	1	$\pm 0.46 \%$	$\pm 0.46 \%$	∞
Probe Positioning	± 6.7	Rectangular	$\sqrt{3}$	1	1	$\pm 3.9 \%$	$\pm 3.9 \%$	∞
Algorithms for Max. SAR Eval.	± 4.0	Rectangular	$\sqrt{3}$	1	1	$\pm 2.3 \%$	$\pm 2.3 \%$	∞
Test Sample Related								
Device Positioning	± 2.9	Normal	1	1	1	$\pm 2.9 \%$	$\pm 2.9 \%$	145
Device Holder	± 3.6	Normal	1	1	1	$\pm 3.6 \%$	$\pm 3.6 \%$	5
Power Drift	± 5.0	Rectangular	$\sqrt{3}$	1	1	$\pm 2.9 \%$	$\pm 2.9 \%$	∞
SAR Scaling	± 0.0	Rectangular	$\sqrt{3}$	1	1	$\pm 0.0 \%$	$\pm 0.0 \%$	∞
Physical Parameters								
Phantom Shell	± 7.6	Rectangular	$\sqrt{3}$	1	1	$\pm 4.4 \%$	$\pm 4.4 \%$	∞
SAR correction	± 0.0	Normal	1	1	0.84	$\pm 0.0 \%$	$\pm 0.0 \%$	∞
Liquid conductivity (Target)	± 5.0	Rectangular	$\sqrt{3}$	0.64	0.43	$\pm 1.8 \%$	$\pm 1.2 \%$	∞
Liquid conductivity (Meas.)	± 4.0	Normal	1	0.78	0.71	$\pm 3.0 \%$	$\pm 2.7 \%$	10
Liquid permittivity (Target)	± 5.0	Rectangular	$\sqrt{3}$	0.60	0.49	$\pm 1.7 \%$	$\pm 1.4 \%$	∞
Liquid permittivity (Meas.)	± 4.2	Normal	1	0.23	0.26	$\pm 0.9 \%$	$\pm 1.0 \%$	10
Temp. unc. - Conductivity	± 1.9	Rectangular	$\sqrt{3}$	0.78	0.71	$\pm 0.9 \%$	$\pm 0.8 \%$	∞
Temp. unc. - Permittivity	± 1.8	Rectangular	$\sqrt{3}$	0.23	0.26	$\pm 0.2 \%$	$\pm 0.3 \%$	∞
Combined Standard Uncertainty						$\pm 11.9 \%$	$\pm 11.7 \%$	330
Expanded Uncertainty (k=2)						$\pm 23.8 \%$	$\pm 23.5 \%$	

The above measurement uncertainties are according to IEEE Std1528 (2013)

12. CONCLUSION

Measurement Conclusion

The SAR measurement indicates that the EUT complies with the RF radiation exposure limits of the FCC. These measurements are taken to simulate the RF effects exposure under the worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters subject to the test. The test results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are every complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role impossible biological effect are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease).

Because innumerable factors may interact to determine the specific biological outcome of an exposure to electromagnetic fields, any protection guide shall consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.

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Attachment 1. – Probe Calibration Data

Calibration Laboratory of
Schmid & Partner
Engineering AG
 Zeughausstrasse 43, 8004 Zurich, Switzerland



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C Service suisse d'étalonnage
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Accreditation No.: SCS 0108

 Client **DT&C (Dymstec)**

 Certificate No: **EX3-3930_Jul18**

CALIBRATION CERTIFICATE

Object **EX3DV4 - SN:3930**

Calibration procedure(s) **QA CAL-01.v9, QA CAL-14.v4, QA CAL-23.v5, QA CAL-25.v6
 Calibration procedure for dosimetric E-field probes**



Calibration date: **July 26, 2018**

This calibration certificate documents the traceability to national standards, which realize the physical units of measurements (SI).
 The measurements and the uncertainties with confidence probability are given on the following pages and are part of the certificate.

All calibrations have been conducted in the closed laboratory facility: environment temperature (22 ± 3)°C and humidity < 70%.

Calibration Equipment used (M&TE critical for calibration)

Primary Standards	ID	Cal Date (Certificate No.)	Scheduled Calibration
Power meter NRP	SN: 104778	04-Apr-18 (No. 217-02672/02673)	Apr-19
Power sensor NRP-Z91	SN: 103244	04-Apr-18 (No. 217-02672)	Apr-19
Power sensor NRP-Z91	SN: 103245	04-Apr-18 (No. 217-02673)	Apr-19
Reference 20 dB Attenuator	SN: S5277 (20x)	04-Apr-18 (No. 217-02682)	Apr-19
Reference Probe ES3DV2	SN: 3013	30-Dec-17 (No. ES3-3013_Dec17)	Dec-18
DAE4	SN: 660	21-Dec-17 (No. DAE4-660_Dec17)	Dec-18
Secondary Standards	ID	Check Date (in house)	Scheduled Check
Power meter E4419B	SN: GB41293874	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: MY41498087	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
Power sensor E4412A	SN: 000110210	06-Apr-16 (in house check Jun-18)	In house check: Jun-20
RF generator HP 8648C	SN: US3642U01700	04-Aug-99 (in house check Jun-18)	In house check: Jun-20
Network Analyzer E8358A	SN: US41080477	31-Mar-14 (in house check Oct-17)	In house check: Oct-18

Calibrated by:	Name Michael Weber	Function Laboratory Technician	Signature 
Approved by:	Name Katja Pokovic	Technical Manager	

Issued: July 28, 2018

This calibration certificate shall not be reproduced except in full without written approval of the laboratory.

Calibration Laboratory of
Schmid & Partner
Engineering AG
 Zeughausstrasse 43, 8004 Zurich, Switzerland



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Accreditation No.: **SCS 0108**

Glossary:

TSL	tissue simulating liquid
NORM _{x,y,z}	sensitivity in free space
ConvF	sensitivity in TSL / NORM _{x,y,z}
DCP	diode compression point
CF	crest factor (1/duty_cycle) of the RF signal
A, B, C, D	modulation dependent linearization parameters
Polarization ϕ	ϕ rotation around probe axis
Polarization ϑ	ϑ rotation around an axis that is in the plane normal to probe axis (at measurement center), i.e., $\vartheta = 0$ is normal to probe axis
Connector Angle	information used in DASY system to align probe sensor X to the robot coordinate system

Calibration is Performed According to the Following Standards:

- IEEE Std 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Averaged Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", June 2013
- IEC 62209-1, "Measurement procedure for the assessment of Specific Absorption Rate (SAR) from hand-held and body-mounted devices used next to the ear (frequency range of 300 MHz to 6 GHz)", July 2016
- IEC 62209-2, "Procedure to determine the Specific Absorption Rate (SAR) for wireless communication devices used in close proximity to the human body (frequency range of 30 MHz to 6 GHz)", March 2010
- KDB 865664, "SAR Measurement Requirements for 100 MHz to 6 GHz"

Methods Applied and Interpretation of Parameters:

- NORM_{x,y,z}**: Assessed for E-field polarization $\vartheta = 0$ ($f \leq 900$ MHz in TEM-cell; $f > 1800$ MHz: R22 waveguide). NORM_{x,y,z} are only intermediate values, i.e., the uncertainties of NORM_{x,y,z} does not affect the E²-field uncertainty inside TSL (see below ConvF).
- NORM(f)_{x,y,z}** = NORM_{x,y,z} * frequency_response (see Frequency Response Chart). This linearization is implemented in DASY4 software versions later than 4.2. The uncertainty of the frequency response is included in the stated uncertainty of ConvF.
- DCP_{x,y,z}**: DCP are numerical linearization parameters assessed based on the data of power sweep with CW signal (no uncertainty required). DCP does not depend on frequency nor media.
- PAR**: PAR is the Peak to Average Ratio that is not calibrated but determined based on the signal characteristics
- A_{x,y,z}; B_{x,y,z}; C_{x,y,z}; D_{x,y,z}; VR_{x,y,z}**: A, B, C, D are numerical linearization parameters assessed based on the data of power sweep for specific modulation signal. The parameters do not depend on frequency nor media. VR is the maximum calibration range expressed in RMS voltage across the diode.
- ConvF and Boundary Effect Parameters**: Assessed in flat phantom using E-field (or Temperature Transfer Standard for $f \leq 800$ MHz) and inside waveguide using analytical field distributions based on power measurements for $f > 800$ MHz. The same setups are used for assessment of the parameters applied for boundary compensation (alpha, depth) of which typical uncertainty values are given. These parameters are used in DASY4 software to improve probe accuracy close to the boundary. The sensitivity in TSL corresponds to NORM_{x,y,z} * ConvF whereby the uncertainty corresponds to that given for ConvF. A frequency dependent ConvF is used in DASY version 4.4 and higher which allows extending the validity from ± 50 MHz to ± 100 MHz.
- Spherical isotropy (3D deviation from isotropy)**: in a field of low gradients realized using a flat phantom exposed by a patch antenna.
- Sensor Offset**: The sensor offset corresponds to the offset of virtual measurement center from the probe tip (on probe axis). No tolerance required.
- Connector Angle**: The angle is assessed using the information gained by determining the NORM_x (no uncertainty required).

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July 26, 2018

Probe EX3DV4

SN:3930

Manufactured: July 24, 2013
Calibrated: July 26, 2018

Calibrated for DASY/EASY Systems
(Note: non-compatible with DASY2 system!)

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July 26, 2018

DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Basic Calibration Parameters

	Sensor X	Sensor Y	Sensor Z	Unc (k=2)
Norm ($\mu\text{V}/(\text{V}/\text{m})^2$) ^A	0.41	0.47	0.43	$\pm 10.1 \%$
DCP (mV) ^B	106.4	99.1	104.4	

Modulation Calibration Parameters

UID	Communication System Name		A dB	B dB $\sqrt{\mu\text{V}}$	C	D dB	VR mV	Unc ^E (k=2)
0	CW	X	0.0	0.0	1.0	0.00	147.9	$\pm 3.3 \%$
		Y	0.0	0.0	1.0		154.7	
		Z	0.0	0.0	1.0		156.4	

The reported uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k=2$, which for a normal distribution corresponds to a coverage probability of approximately 95%.

^A The uncertainties of Norm X,Y,Z do not affect the E²-field uncertainty inside TSL (see Pages 5 and 6).

^B Numerical linearization parameter: uncertainty not required.

^E Uncertainty is determined using the max. deviation from linear response applying rectangular distribution and is expressed for the square of the field value.

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July 26, 2018

DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Calibration Parameter Determined in Head Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth ^G (mm)	Unc (k=2)
2450	39.2	1.80	7.85	7.85	7.85	0.33	0.92	± 12.0 %
2600	39.0	1.96	7.71	7.71	7.71	0.34	0.92	± 12.0 %
3500	37.9	2.91	7.25	7.25	7.25	0.25	1.20	± 13.1 %
3700	37.7	3.12	7.06	7.06	7.06	0.23	1.20	± 13.1 %
5200	36.0	4.66	5.28	5.28	5.28	0.40	1.80	± 13.1 %
5300	35.9	4.76	5.10	5.10	5.10	0.40	1.80	± 13.1 %
5500	35.6	4.96	4.94	4.94	4.94	0.40	1.80	± 13.1 %
5600	35.5	5.07	4.85	4.85	4.85	0.40	1.80	± 13.1 %
5800	35.3	5.27	4.69	4.69	4.69	0.40	1.80	± 13.1 %

^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

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DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Calibration Parameter Determined in Body Tissue Simulating Media

f (MHz) ^C	Relative Permittivity ^F	Conductivity (S/m) ^F	ConvF X	ConvF Y	ConvF Z	Alpha ^G	Depth (mm) ^G	Unc (k=2)
2450	52.7	1.95	7.89	7.89	7.89	0.29	1.02	± 12.0 %
2600	52.5	2.16	7.65	7.65	7.65	0.32	0.98	± 12.0 %
3500	51.3	3.31	6.87	6.87	6.87	0.23	1.25	± 13.1 %
3700	51.0	3.55	6.93	6.93	6.93	0.25	1.25	± 13.1 %
5200	49.0	5.30	4.61	4.61	4.61	0.50	1.90	± 13.1 %
5300	48.9	5.42	4.47	4.47	4.47	0.50	1.90	± 13.1 %
5500	48.6	5.65	4.19	4.19	4.19	0.50	1.90	± 13.1 %
5600	48.5	5.77	4.09	4.09	4.09	0.50	1.90	± 13.1 %
5800	48.2	6.00	4.14	4.14	4.14	0.50	1.90	± 13.1 %

^C Frequency validity above 300 MHz of ± 100 MHz only applies for DASY v4.4 and higher (see Page 2), else it is restricted to ± 50 MHz. The uncertainty is the RSS of the ConvF uncertainty at calibration frequency and the uncertainty for the indicated frequency band. Frequency validity below 300 MHz is ± 10, 25, 40, 50 and 70 MHz for ConvF assessments at 30, 64, 128, 150 and 220 MHz respectively. Above 5 GHz frequency validity can be extended to ± 110 MHz.

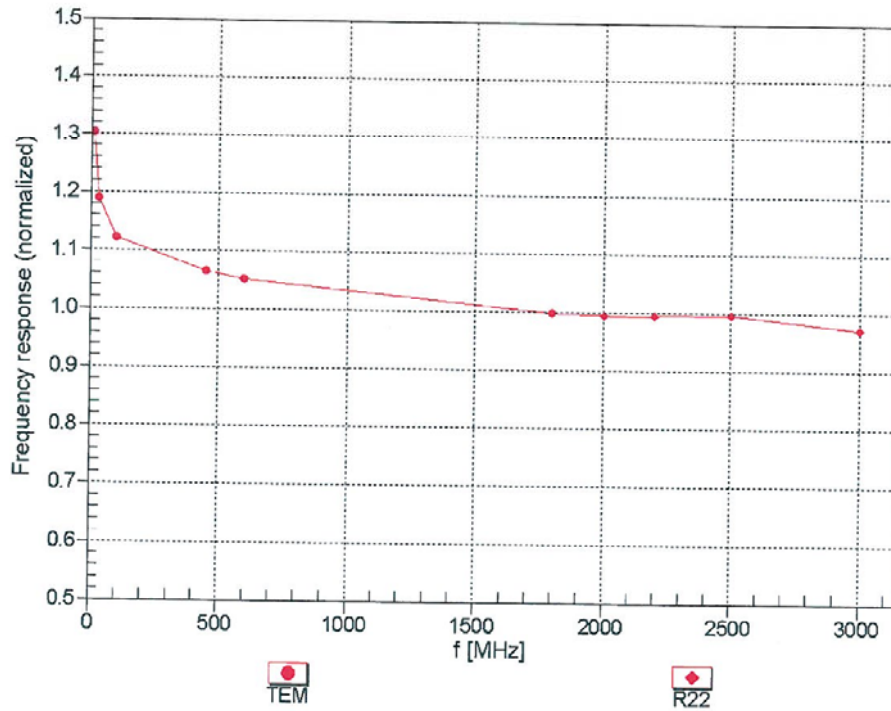
^F At frequencies below 3 GHz, the validity of tissue parameters (ϵ and σ) can be relaxed to ± 10% if liquid compensation formula is applied to measured SAR values. At frequencies above 3 GHz, the validity of tissue parameters (ϵ and σ) is restricted to ± 5%. The uncertainty is the RSS of the ConvF uncertainty for indicated target tissue parameters.

^G Alpha/Depth are determined during calibration. SPEAG warrants that the remaining deviation due to the boundary effect after compensation is always less than ± 1% for frequencies below 3 GHz and below ± 2% for frequencies between 3-6 GHz at any distance larger than half the probe tip diameter from the boundary.

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Frequency Response of E-Field (TEM-Cell:ifi110 EXX, Waveguide: R22)

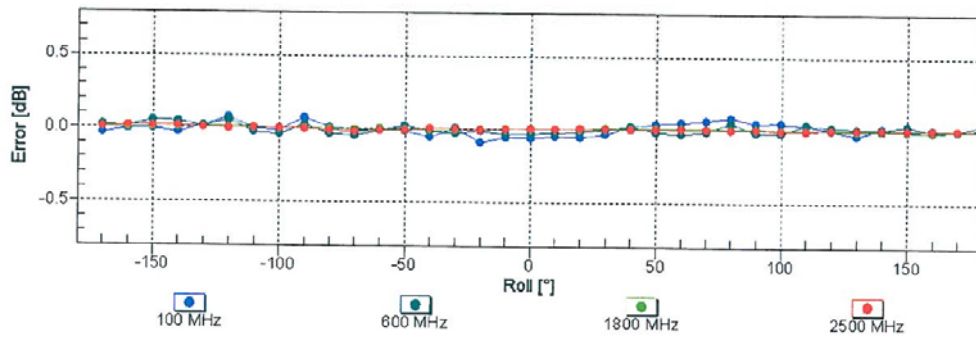
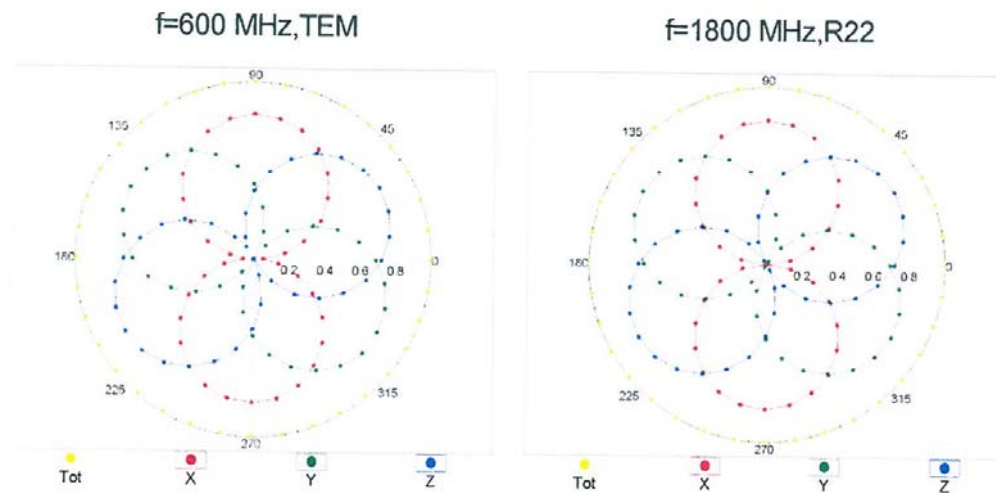


Uncertainty of Frequency Response of E-field: $\pm 6.3\%$ (k=2)

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Receiving Pattern (ϕ), $\vartheta = 0^\circ$

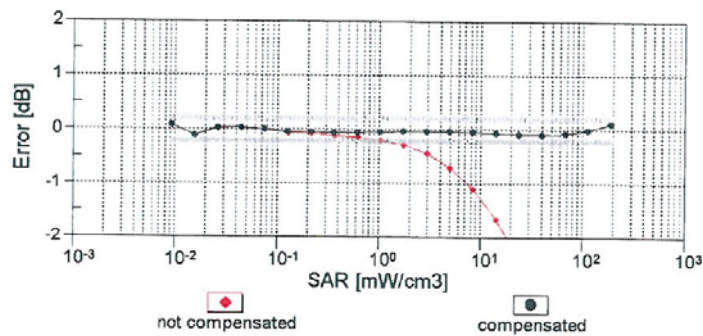
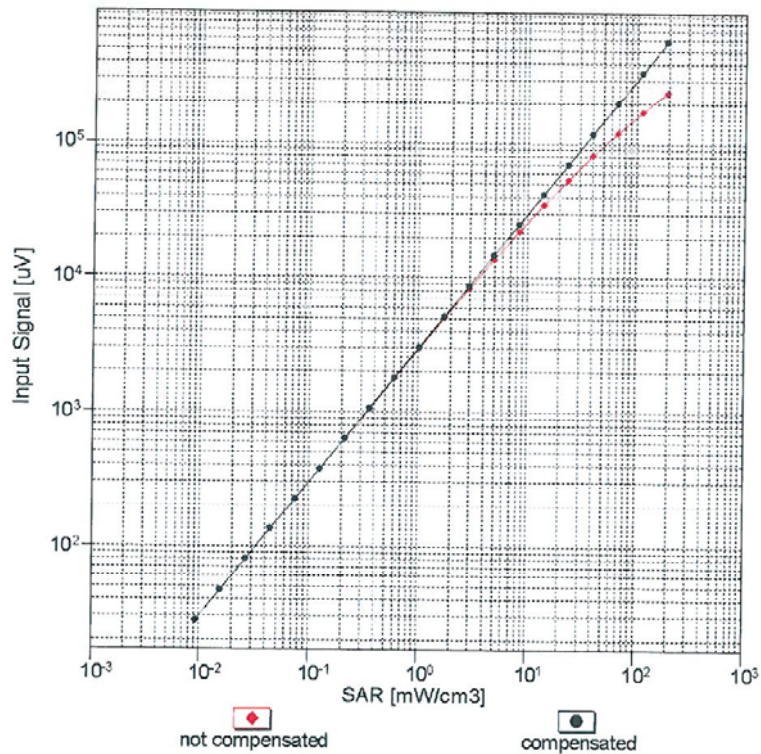


Uncertainty of Axial Isotropy Assessment: $\pm 0.5\%$ (k=2)

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Dynamic Range $f(SAR_{head})$ (TEM cell, $f_{eval} = 1900$ MHz)

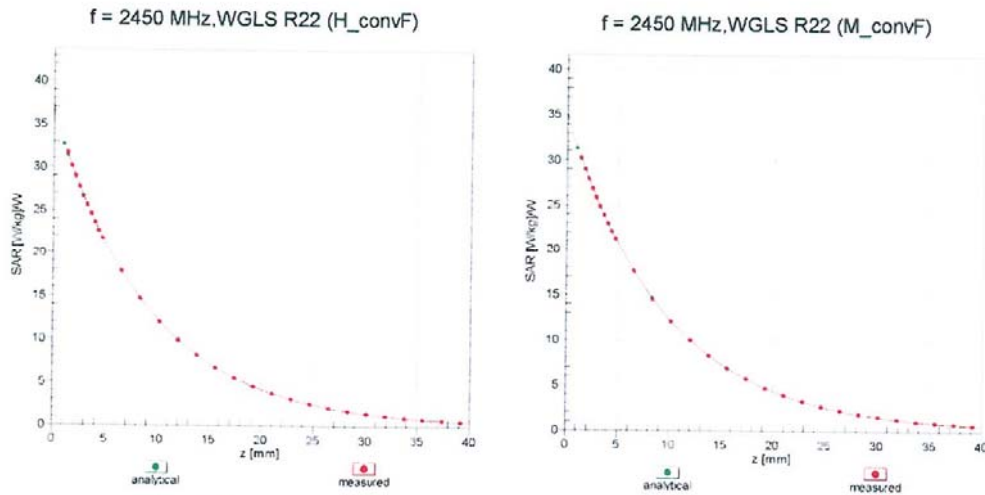


Uncertainty of Linearity Assessment: $\pm 0.6\%$ (k=2)

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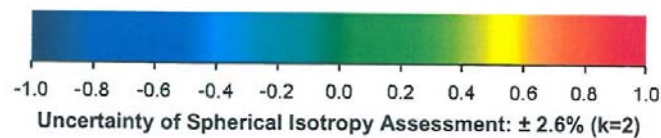
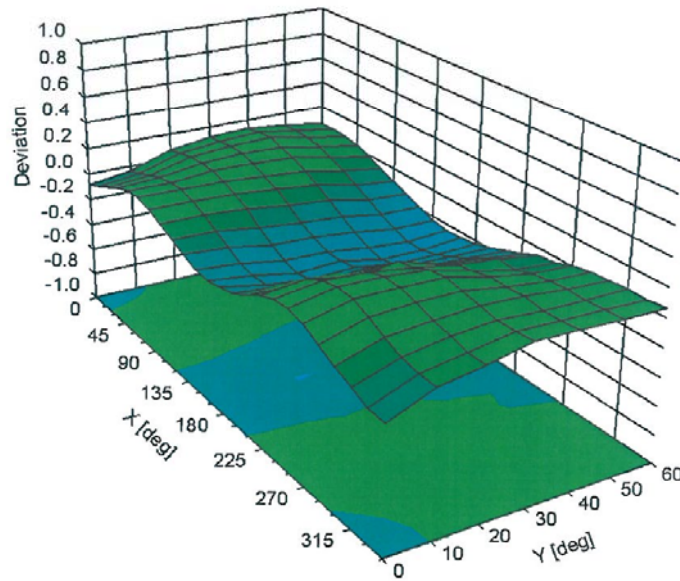
July 26, 2018

Conversion Factor Assessment



Deviation from Isotropy in Liquid

Error (ϕ, θ), f = 900 MHz



EX3DV4- SN:3930

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DASY/EASY - Parameters of Probe: EX3DV4 - SN:3930

Other Probe Parameters

Sensor Arrangement	Triangular
Connector Angle (°)	119.8
Mechanical Surface Detection Mode	enabled
Optical Surface Detection Mode	disabled
Probe Overall Length	337 mm
Probe Body Diameter	10 mm
Tip Length	9 mm
Tip Diameter	2.5 mm
Probe Tip to Sensor X Calibration Point	1 mm
Probe Tip to Sensor Y Calibration Point	1 mm
Probe Tip to Sensor Z Calibration Point	1 mm
Recommended Measurement Distance from Surface	1.4 mm