

## SAR Evaluation Report

**Applicant** : Winmate Inc.

**Applicant Address** : 9F, No.111-6, Shing-De Rd., San-Chung District, New Taipei City 241, Taiwan

**Product Name** : Intel Wi-Fi 6E AX210 Module

**Trade Name** : Intel

**Model Number** : AX210NGW

**Applicable Standard** : 47 CFR §2.1093

**Received Date** : Jan. 11, 2024

**Test Period** : Jan. 23, 2024

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Taiwan Accreditation Foundation accreditation number: 1330  
Test Firm MRA designation number: TW0010

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**Approved By :**



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## *Revision History*

<i>Rev.</i>	<i>Issued Date</i>	<i>Description</i>	<i>Revised by</i>
00	Feb. 21, 2024	Initial Issue	Rowan Hsieh

# 1. General Information

## 1.1 Reference Testing Standards

Standard	Description	Version
47 CFR §2.1093	Radiofrequency radiation exposure evaluation: portable devices	-
IEC/IEEE 62209-1528	Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)	2020
IEEE 1528	Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques	2013
IEEE C95.1	IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz	1992
KDB 248227 D01	SAR guidance for IEEE 802.11 (Wi-Fi) transmitters	v02r02
KDB 447498 D04	RF exposure procedures and equipment authorization policies for mobile and portable devices	v01
KDB 616217 D04	SAR evaluation considerations for laptop, notebook and tablet computers	v01r02
KDB 865664 D01	SAR measurement requirement for 100 MHz to 6 GHz	v01r04
KDB 865664 D02	RF exposure compliance reporting and documentation considerations	v01r02

## 1.2 Testing Location

### Test Facilities

Company Name: Eurofins E&E Wireless Taiwan Co., Ltd.  
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### Test Site Location

- No. 140-1, Changan Street, Bade District, Taoyuan City 334025, Taiwan
- No. 2, Wuquan 5th Rd. Wugu Dist., New Taipei City, Taiwan

### Laboratory Accreditation

Location	TAF	FCC	ISED
No. 140-1, Changan Street, Bade District, Taoyuan City 334025, Taiwan	Accreditation No.: 1330	Designation No.: TW0010	Company No.: 7381A CAB ID: TW1330
No. 2, Wuquan 5th Rd. Wugu Dist., New Taipei City, Taiwan	Accreditation No.: 1330	Designation No.: TW0034	Company No.: 28922 CAB ID: TW1330

## 2. Description of Device Under Test (DUT)

<b>Applicant</b>	Winmate Inc. 9F, No.111-6, Shing-De Rd., San-Chung District, New Taipei City 241, Taiwan			
<b>Product Name</b>	Intel Wi-Fi 6E AX210 Module			
<b>Trade Name</b>	Intel			
<b>Model Number</b>	AX210NGW			
<b>FCC ID</b>	PX9AX210			
<b>Host Information</b>	Product Name: Rugged Tablet PC Trade Name: Winmate Model Name: M101AD, M101XXXXXXXXXXXX ("X"= A~Z,a~z,0~9,"-" Blank or Slash for marketing purpose only, no impact safety related constructions or critical components) All models are electrically identical, different model names are for marketing purpose.			
<b>Frequency Range</b>	WLAN 2.4 GHz Band : 2412 - 2472 MHz Bluetooth : 2402 - 2480 MHz			
<b>Supported Modulations</b>	WLAN 2.4 GHz : 802.11b / g / n / ax HT20 / HT40 / HE20 / HE40			
	Bluetooth : BR / EDR / LE			
<b>Device Category</b>	Portable			
<b>Module Name</b>	Intel, AX210NGW			
<b>Accessory Information</b>				
<b>Adapter</b>	Trade Name	Chicony Power Technology Co., Ltd.	Model Number	A18-065N3A
	Input: 100-240 V, 1.7 A, 50~60 Hz Output: 19 V, 3.42 A, 65 W			
<b>Power Cord</b>	Trade Name	Phino Electric Co.Ltd	Model Number	PHP-301 PHS-301
<b>Battery</b>	Trade Name	Winmate Inc.	Model Number	BWK101
	DC 11.55 V, 4558 mAh			

**Note:**

1. The above information of DUT was declared by manufacturer. Please refer to the specifications or user's manual for more detailed description.

### 3. Summary of Maximum Value

<i>Highest Reported SAR</i>		
<i>Equipment Class</i>	<i>Mode</i>	<i>Exposure Condition</i> <i>Body</i> <i>(Separation: 0 mm)</i> <i>SAR<sub>1g</sub> (W/kg)</i>
DTS	WLAN 2.4 GHz	0.86
DSS / DTS	Bluetooth	0.07
<b>SAR Limits</b>		1.60

**Note:**

1. The SAR limit for general population / uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.
2. The test procedures, as described in American National Standards, Institute ANSI/IEEE C95.1 ANSI/IEEE C95.3 (For IC) were employed and they specify the maximum exposure limit of tissue for portable devices being used within 20 cm between user and DUT in the uncontrolled environment. A description of the product and operating configuration, detailed summary of the test results, methodology and procedures used in the equipment used are included within this test report.

## 4. Introduction

### 4.1 SAR Definition

Specific Absorption Rate (SAR) is defined as the time derivative (rate) of the incremental energy (dw) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

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

SAR measurement can be related to the electrical field in the tissue by

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

Where :

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

$\rho$  = mass density of the tissue (kg/m<sup>3</sup>)

$E$  = RMS electric field strength (V/m)

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

### 4.2 RF Exposure Limits

**Table 1 Safety Limits for Controlled / Uncontrolled Environment Exposure**

SAR Exposure Limit		
	General Population / Uncontrolled Exposure 1 (W/kg)	Occupational / Controlled Exposure 2 (W/kg)
Spatial Peak SAR 3 (head or Body)	1.60	8.00
Spatial Peak SAR 4 (Whole Body)	0.08	0.40
Spatial Peak SAR 5 (Hands / Feet / Ankle / Wrist )	4.00	20.00

**Notes :**

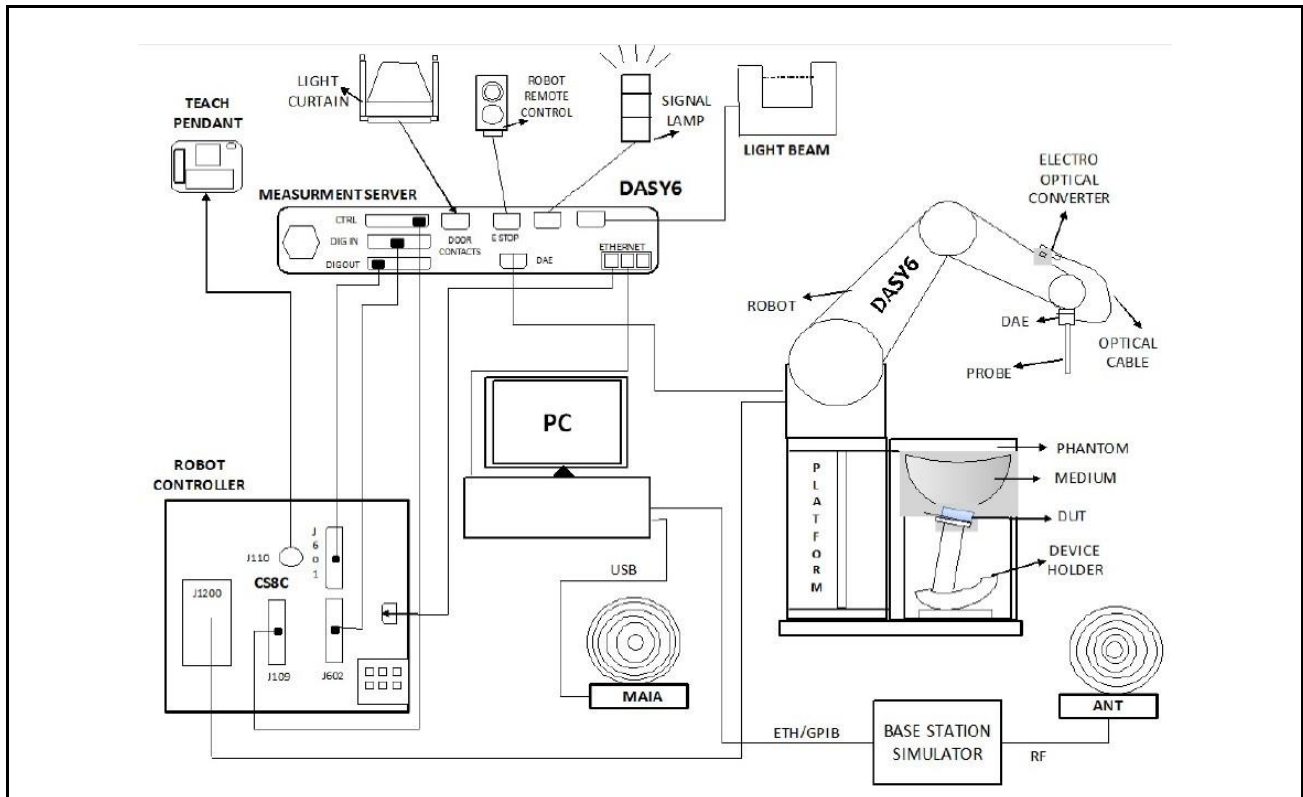
1. **General Population / Uncontrolled Environments** are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.
2. **Occupational / Controlled Environments** are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation).
3. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
4. The Spatial Average value of the SAR averaged over the whole body.
5. 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.



## 5. System Description

### 5.1 SAR Measurement System

The DASY system in SAR Configuration is shown below:



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

1. A standard high precision 6-axis robot (Stäubli TX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
2. An isotropic field probe optimized and calibrated for the targeted measurements.
3. 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.
4. The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
5. The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
6. The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
7. A computer running Win7/Win8/Win10 professional operating system and DASY software.
8. Remote controls with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
9. The phantom, the device holder and other accessories according to the targeted measurement.
10. Tissue simulating liquid mixed according to the given recipes.
11. The validation dipole has been calibrated within and the system performance check has been successful.

**<DASY E-Field Probe System>**

The SAR measurements were conducted with the dosimetric probe (manufactured by SPEAG), designed in the classical triangular configuration 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 multi-fiber 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 DASY software reads the reflection during a software approach and looks for the maximum using a 2nd order fitting. The approach is stopped when reaching the maximum.

<b>Construction</b>	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
<b>Frequency</b>	4 MHz to 10 GHz Linearity: $\pm 0.2$ dB (30 MHz to 10 GHz)
<b>Directivity</b>	$\pm 0.1$ dB in TSL (rotation around probe axis) $\pm 0.3$ dB in TSL (rotation normal to probe axis)
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
<b>Calibration</b>	ISO/IEC 17025 calibration service available




**EX3DV4 E-Field Probe**




**Probe setup on robot**

**<Data Acquisition Electronic (DAE) System>**



<b>Model</b>	DAE4	
<b>Construction</b>	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
<b>Measurement Range</b>	-100 to +300 mV (16 bit resolution and two range settings: 4 mV, 400 mV)	
<b>Input Offset Voltage</b>	< 5 μV (with auto zero)	
<b>Input Bias Current</b>	< 50 fA	
<b>Dimensions</b>	60 x 60 x 68 mm	

**<Robot>**

<b>Positioner</b>	Stäubli Unimation Corp.	
<b>Robot Model</b>	TX90XL	
<b>Number of Axes</b>	6	
<b>Nominal Load</b>	5 kg	
<b>Reach</b>	1450 mm	
<b>Repeatability</b>	± 0.035 mm	


**<Device Holder>**

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity  $\epsilon=3$  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.

	
<i>Device Holder 1</i>	<i>Device Holder 2</i>

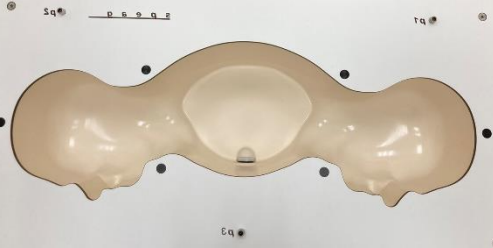
**<Oval Flat Phantom – ELI>**

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (Oval Flat) phantom defined in IEEE 1528, IEC 62209-2 and IEC/IEEE 62209-1528. It enables the dosimetric evaluation of wireless portable device 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 manually teaching three points with the robot.

<b>Shell Thickness</b>	2 ±0.2 mm	
<b>Filling Volume</b>	Approx. 30 liters	
<b>Dimensions</b>	190×600×400 mm (H × L × W)	

**<SAM Phantom>**

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528, IEC 62209-1 and IEC/IEEE 62209-1528. 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.

<b>Shell Thickness</b>	2 ±0.2 mm	
<b>Filling Volume</b>	Approx. 25 liters	
<b>Dimensions</b>	Length: 1000 mm Width: 500 mm Height: adjustable feet	

## 5.2 Tissue Simulating Liquids (TSL)

### <Tissue Dielectric Parameters in IEEE 1528-2013 and IEC/IEEE 62209-1528>

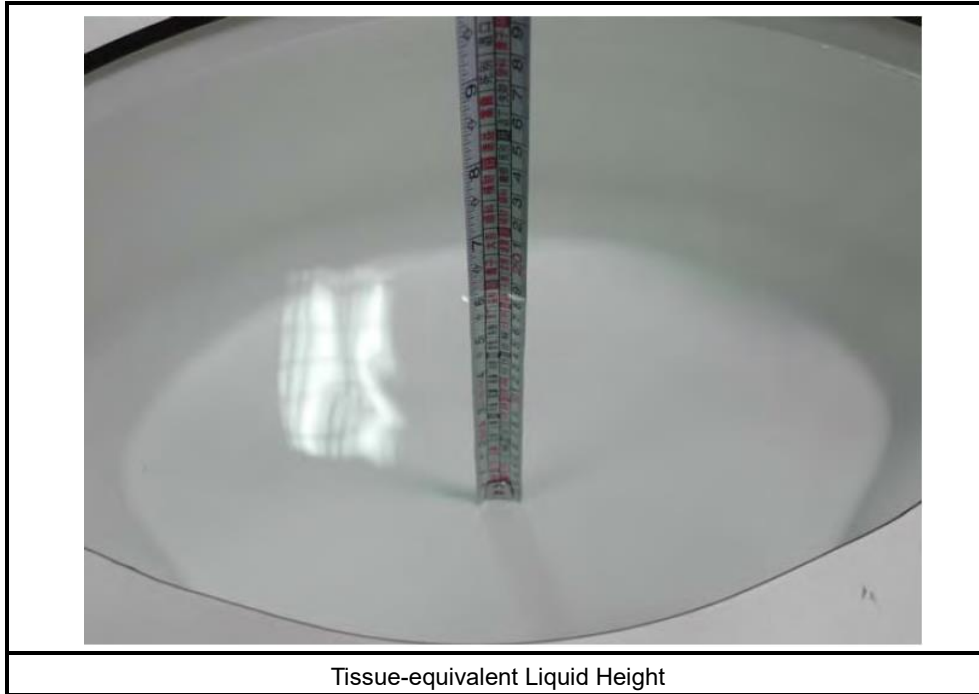
The following table incorporates the tissue dielectric parameters of head recommended by IEEE 1528-2013 and IEC/IEEE 62209-1528. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in human head. Other head and body tissue parameters that have not been specified are derived from the tissue dielectric parameters which computed by the 4-Cole-Cole equation according to the above-mentioned standards.

**Table 2 Dielectric properties of the tissue-equivalent liquid material**

Frequency (MHz)	Relative Permittivity ( $\epsilon_r$ )	Conductivity ( $\sigma$ )
30	55.0	0.75
150	52.3	0.76
300	45.3	0.87
450	43.5	0.87
750	41.9	0.89
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1800	40.0	1.40
1900	40.0	1.40
1950	40.0	1.40
2000	40.0	1.40
2100	39.8	1.49
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40
3500	37.9	2.91
4000	37.4	3.43
4500	36.8	3.94
5000	36.2	4.45
5200	36.0	4.66
5400	35.8	4.86
5600	35.5	5.07
5800	35.3	5.27
6000	35.1	5.48
6500	34.5	6.07
7000	33.9	6.65
7500	33.3	7.24
8000	32.7	7.84
8500	32.1	8.46
9000	31.6	9.08
9500	31.0	9.71
10000	30.4	10.4

**<Liquid Depth>**

The depth of tissue-equivalent liquid in a phantom must be  $\geq 15.0$  cm to ensure that the probe is immersed sufficiently in the tissue medium.



**<Test Site Environment>**

Item	Requirement	Actual
Temperature (°C)	18 - 25	21 - 23

**<Liquid Check>**

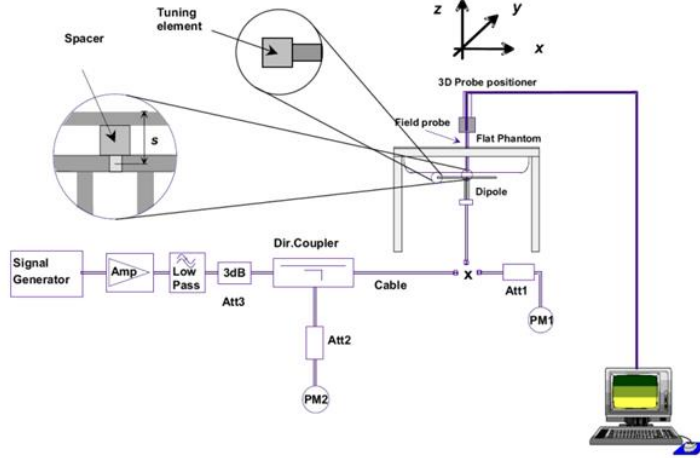

1. The dielectric parameters of the liquids were verified prior to the SAR evaluation using a DAKS 3.5 Probe Kit.
2. The SAR testing with IEC tissue parameters as an alternative option to Head and body parameters. The head TSL were applied to body SAR tests with restrictions below:

Frequency (MHz)	Ambient Temp. (°C)	Tissue Temp. (°C)	Permittivity ( $\epsilon_r$ )	Conductivity ( $\sigma$ )	Targeted Permittivity ( $\epsilon_r$ )	Targeted Conductivity ( $\sigma$ )	Deviation Permittivity ( $\epsilon_r$ ) (%)	Deviation Conductivity ( $\sigma$ ) (%)	Date
2450	21.6	21.2	39.2	1.80	39.2	1.8	0.00	0.00	Jan. 23, 2024

## 6. System Verification

### 6.1 SAR System Verification

#### <Symmetric Dipoles for SAR System Verification>

<b>Construction</b>	Symmetrical dipole with $\lambda/4$ balun enables measurement of feed point impedance with NWA matched for use near flat phantoms filled with head simulating solutions Includes distance holder and tripod adaptor Calibration Calibrated SAR value for specified position and input power at the flat phantom in head simulating solutions.
<b>Return Loss</b>	> 20 dB at specified verification position.
<b>Options</b>	Dipoles for other frequencies or solutions and other calibration conditions are available upon request.
	
	
<div style="display: flex; justify-content: space-around;"> <span><b>System Verification Setup Diagram</b></span> <span><b>Validation Kit</b></span> </div>	

#### 6.1.1 SAR Verification Summary

Prior to the assessment, the validation data compared to the original value provided by SPEAG should be within its specifications of  $\pm 10\%$ . The measured SAR will be normalized to 1 W input power. The result indicates the system check can meet the variation criterion and plots can be referred to Appendix B of this report.

Date	Frequency (MHz)	Targeted 1g SAR (W/kg)	Measured 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N	Output Power (dBm)
Jan. 23, 2024	2450	52.5	2.38	47.49	-9.55	1087	7757	1742	17

## 7. Test Equipment List

### 7.1 SAR Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Cal. Date	Cal.Period
SPEAG	2450 MHz System Validation Kit	D2450V2	1087	Aug. 18, 2023	1 year
SPEAG	Dosimetric E-Field Probe	EX3DV4	7757	Aug. 22, 2023	1 year
SPEAG	Data Acquisition Electronics	DAE4	1742	Aug. 17, 2023	1 year
R&S	Spectrum Analyzer	FSV3044	101255	Nov. 30, 2023	1 year
Anritsu	Radio Communication Analyzer	MT8870A	6272488631	Sep. 11, 2023	1 year
SPEAG	Dielectric Probe Kit	DAKS-3.5	1101	May. 23, 2023	1 year
SPEAG	Dielectric Probe Kit	DAKS_VNA R140B	22420002	Dec. 05, 2023	1 year
SPEAG	POWERSOURCE1	SE UMS 160 CA	4283	Aug. 16, 2023	1 year
HILA	Digital Thermometer	TM-905A	2202675	Sep. 19, 2023	1 year
Testo	Thermometer	608-H1	83837935	Dec. 08, 2023	1 year

Testing Engineer: Ida Chen



## 8. Measurement Procedure

### 8.1 SAR Measurement Procedure

The measurement procedures are as follows:

1. The DUT is installed engineering testing software that provides continuous transmitting signal.
2. Measure output power through RF cable and power meter
3. Set scan area, grid size and other setting on the DASY software
4. Find out the largest SAR result on these testing positions of each band
5. Measure SAR results for other channels in worst SAR testing position if the SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

1. Power reference measurement
2. Area scan
3. Zoom scan
4. Power drift measurement

### 8.1.1 Area & Zoom Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures points and step size follow as below. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution.

The measure settings are referred to KDB 865664 D01v01r04 :

		≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location		30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$		≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
		When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	Graded grid	$\Delta z_{Zoom}(1)$ : between 1st two points closest to phantom surface	≤ 4 mm 3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$ : between subsequent points	≤ 1.5 · $\Delta z_{Zoom}(n-1)$ mm
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

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

\* When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB Publication 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

### **8.1.2 Volume Scan Procedures**

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1 g aggregate SAR, the DUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

### **8.1.3 Power Drift Monitoring**

All SAR testing is under the DUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of DUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5 %, the SAR will be retested.

### **8.1.4 Spatial Peak SAR Evaluation**

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1 g and 10 g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1 g and 10 g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1 g and 10 g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

1. Extraction of the measured data (grid and values) from the Zoom Scan
2. Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
3. Generation of a high-resolution mesh within the measured volume
4. Interpolation of all measured values form the measurement grid to the high-resolution grid
5. Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
6. Calculation of the averaged SAR within masses of 1 g and 10 g

## 9. Measurement Uncertainty

### 9.1 SAR Measurement Uncertainty

<b>Measurement Uncertainty (0.3-6 GHz)</b>								
<b>Uncertainty Component</b>	<b>Tol.</b>	<b>Prob. Dist.</b>	<b>Div.</b>	<b>Ci - 1g</b>	<b>Ci - 10g</b>	<b>ui - 1g (%)</b>	<b>ui - 10g (%)</b>	<b>vi</b>
<b>Measurement System</b>								
Probe calibration	12.0	N	2	1	1	6.0	6.0	∞
Probe Calibration Drift	1.7	R	1.732	1	1	1.0	1.0	∞
Other Probe+Electronic	0.7	N	1	1	1	0.7	0.7	∞
Probe Linearity	4.7	R	1.732	1	1	2.7	2.7	∞
Broadband Signal	3.0	R	1.732	1	1	1.7	1.7	∞
Probe Isotropy	7.6	R	1.732	1	1	4.4	4.4	∞
RF Ambient	1.8	N	1	1	1	1.8	1.8	∞
Probe Positioning	0.006 mm	N	1	0.14	0.14	0.1	0.1	∞
Data Processing	1.2	N	1	1	1	1.2	1.2	∞
<b>Phantom and Device Errors</b>								
Conductivity (meas.)DAK	2.5	N	1	0.78	0.71	2.0	1.8	∞
Conductivity (temp.)	3.3	R	1.732	0.78	0.71	1.5	1.4	∞
Phantom Shell Permittivity	14	R	1.732	0	0	0.0	0.0	∞
Distance DUT - TSL	2	N	1	2	2	4.0	4.0	∞
Device Positioning	1	N	1	1	1	1.0	1.0	∞
Device Holder	3.6	N	1	1	1	3.6	3.6	∞
DUT Modulation	2.4	R	1.732	1	1	1.4	1.4	∞
Time-average SAR	1.7	R	1.732	1	1	1.0	1.0	∞
DUT Drift	2.5	N	1	1	1	2.5	2.5	∞
<b>Correction to the SAR Results</b>								
Deviation to Target	1.9	N	1	1	0.84	1.9	1.6	∞
SAR scaling	0.0	R	1.732	1	1	0.0	0.0	∞
<b>Combined Standard Uncertainty</b>					RSS	11.0	10.9	
<b>Expanded Uncertainty (95% confidence interval)</b>					k =2	21.9	21.7	

<b>Measurement Uncertainty (3-6 GHz)</b>								
<b>Uncertainty Component</b>	<b>Tol.</b>	<b>Prob. Dist.</b>	<b>Div.</b>	<b>Ci - 1g</b>	<b>Ci - 10g</b>	<b>ui - 1g (%)</b>	<b>ui - 10g (%)</b>	<b>vi</b>
<b>Measurement System</b>								
Probe Calibration	13.1	N	2	1	1	6.55	6.55	∞
Probe Calibration Drift	1.7	R	1.732	1	1	1.0	1.0	∞
Other Probe+Electronic	1.2	N	1	1	1	1.2	1.2	∞
Probe Linearity	4.7	R	1.732	1	1	2.7	2.7	∞
Broadband Signal	2.6	R	1.732	1	1	1.5	1.5	∞
Probe Isotropy	7.6	R	1.732	1	1	4.4	4.4	∞
RF Ambient	1.8	N	1	1	1	1.8	1.8	∞
Probe Positioning	0.005 mm	N	1	0.29	0.29	0.15	0.15	∞
Data Processing	2.3	N	1	1	1	2.3	2.3	∞
<b>Phantom and Device Errors</b>								
Conductivity (meas.)DAK	2.5	N	1	0.78	0.71	2.0	1.8	∞
Conductivity (temp.)	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Phantom Shell Permittivity	14	R	1.732	0.25	0.25	2.0	2.0	∞
Distance DUT - TSL	2	N	1	2	2	4.0	4.0	∞
Device Positioning	1	N	1	1	1	1.0	1.0	∞
Device Holder	3.6	N	1	1	1	3.6	3.6	∞
DUT Modulation	2.4	R	1.732	1	1	1.4	1.4	∞
Time-average SAR	1.7	R	1.732	1	1	1.0	1.0	∞
DUT Drift	2.5	N	1	1	1	2.5	2.5	∞
<b>Correction to the SAR Results</b>								
Deviation to Target	1.9	N	1	1	0.84	1.9	1.6	∞
SAR scaling	0.0	R	1.732	1	1	0.0	0.0	∞
<b>Combined Standard Uncertainty</b>					RSS	11.6	11.6	
<b>Expanded Uncertainty (95% confidence interval)</b>					k =2	23.2	23.0	

<b>Measurement Uncertainty (6-10 GHz)</b>								
<b>Uncertainty Component</b>	<b>Tol.</b>	<b>Prob. Dist.</b>	<b>Div.</b>	<b>Ci - 1g</b>	<b>Ci - 10g</b>	<b>ui - 1g (%)</b>	<b>ui - 10g (%)</b>	<b>vi</b>
<b>Measurement System</b>								
Probe calibration	18.6	N	2	1	1	9.3	9.3	∞
Probe Calibration Drift	1.7	R	1.732	1	1	1.0	1.0	∞
Other Probe+Electronic	2.4	N	1	1	1	2.4	2.4	∞
Probe Linearity	4.7	R	1.732	1	1	2.7	2.7	∞
Broadband Signal	2.8	R	1.732	1	1	1.6	1.6	∞
Probe Isotropy	7.6	R	1.732	1	1	4.4	4.4	∞
RF Ambient Condition	1.8	N	1	1	1	1.8	1.8	∞
Probe Positioning	0.005mm	N	1	0.50	0.50	0.25	0.25	∞
Data Processing	3.5	N	1	1	1	3.5	3.5	∞
<b>Phantom and Device Errors</b>								
Conductivity (meas.)DAK	2.5	N	1	0.78	0.71	2.0	1.8	∞
Conductivity (temp.)	2.4	R	1.732	0.78	0.71	1.1	1.0	∞
Phantom Shell Permittivity	14.0	R	1.732	0.5	0.5	4.0	4.0	∞
Distance DUT - TSL	2	N	1	2	2	4.0	4.0	∞
Device Positioning	1	N	1	1	1	1.0	1.0	∞
Device Holder	3.6	N	1	1	1	3.6	3.6	∞
DUT Modulation	2.4	R	1.732	1	1	1.4	1.4	∞
Time-average SAR	1.7	R	1.732	1	1	1.0	1.0	∞
DUT Drift	2.5	N	1	1	1	2.5	2.5	∞
<b>Correction to the SAR Results</b>								
Deviation to Target	1.9	N	1	1	0.84	1.9	1.6	∞
SAR scaling	0.0	R	1.732	1	1	0.0	0.0	∞
<b>Combined Standard Uncertainty</b>					RSS	14.2	14.1	
<b>Expanded Uncertainty (95% confidence interval)</b>					k =2	28.4	28.3	

## 10. Measurement Evaluation

### 10.1 Positioning of the DUT in Relation to the Phantom

According to KDB 616217 D04:

1. SAR evaluation is required for back (bottom) surface and side edges of the devices.
2. Some 2-in-1 tablets may operate with the display folded on top of the keyboard. Most recent tablets are designed with an interactive display that may not require a physical keyboard. Both configurations are used in similar manners and require SAR evaluation for the back surface and edges of the tablet. For keyboards that can be unfolded like a laptop, SAR evaluation is required for the bottom surface of the keyboard.
3. SAR evaluation for the front surface of tablet display screens are generally not necessary, except for tablets that are designed to require continuous operations with the hand(s) next to the antenna.
4. When voice mode is supported on a tablet and it is limited to speaker mode or headset operations only, additional SAR testing for this type of voice use is not required.

## 10.2 SAR Testing Consideration

### 10.2.1 SAR Testing with WLAN

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies.

For WLAN SAR testing, the DUT has installed WLAN engineering testing software which can provide continuous transmitting RF signal. And the RF signal utilized in SAR measurement has almost 100 % duty cycle and crest factor is 1.

- The cards was operated utilizing proprietary software (DRTU) and each channel was measured using a broadband power meter to determine the maximum average power.

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

- $\leq 0.4$  W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- $> 0.4$  W/kg, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is  $\leq 0.8$  W/kg or all required test positions are tested.
  - ✘ For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
  - ✘ When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is  $> 0.8$  W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required test channels are considered.
  - ✘ The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.

To determine the initial test position, Area Scans were performed to determine the position with the Maximum Value of SAR (measured). The position that produced the highest Maximum Value of SAR is considered as the worst case position; thus used as the initial test position.

- After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following:
  - (1) The channel closest to mid-band frequency is selected for SAR measurement.
  - (2) For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.
 These channel selection procedures apply to both the initial test configuration and subsequent test configuration(s) selection.



### **10.3 Conducted Power Measurements**

Refer to Appendix A

### **10.4 Antenna location**

Refer to Appendix E.

## 10.5 Test Results

### 10.5.1 SAR Test Result

Index.	Band	Modulation	Test Position	Spacing (mm)	Channel	Antenna	Power Drift	Meas. Conducted Power (dBm)	Tune-up (dBm)	Duty Cycle (%)	SAR <sub>1g</sub> (W/kg)	Reported SAR <sub>1g</sub> (W/kg)
	WLAN 2.4G	802.11b	Rear Face	0	6	Ant 1	-0.19	21.34	21.5	99.11	0.436	0.46
	WLAN 2.4G	802.11b	Left Side	0	6	Ant 1	0.14	21.34	21.5	99.11	0.602	0.63
	WLAN 2.4G	802.11b	Right Side	0	6	Ant 1	0	21.34	21.5	99.11	0.001	0.00
	WLAN 2.4G	802.11b	Top Side	0	6	Ant 1	0	21.34	21.5	99.11	0.001	0.00
	WLAN 2.4G	802.11b	Bottom Side	0	6	Ant 1	-0.14	21.34	21.5	99.11	0.099	0.10
	WLAN 2.4G	802.11b	Rear Face	0	6	Ant 2	0.16	21.37	21.5	99.11	0.291	0.30
	WLAN 2.4G	802.11b	Left Side	0	6	Ant 2	0	21.37	21.5	99.11	0.001	0.00
	WLAN 2.4G	802.11b	Right Side	0	6	Ant 2	-0.02	21.37	21.5	99.11	0.454	0.47
	WLAN 2.4G	802.11b	Top Side	0	6	Ant 2	0	21.37	21.5	99.11	0.001	0.00
	WLAN 2.4G	802.11b	Bottom Side	0	6	Ant 2	0.11	21.37	21.5	99.11	0.305	0.32
	WLAN 2.4G	802.11n HT20	Rear Face	0	6	Ant 1+2	0.06	23.79	24	99.37	0.331	0.35
	WLAN 2.4G	802.11n HT20	Left Side	0	6	Ant 1+2	0.04	23.79	24	99.37	0.599	0.63
	WLAN 2.4G	802.11n HT20	Right Side	0	6	Ant 1+2	-0.02	23.79	24	99.37	0.587	0.62
	WLAN 2.4G	802.11n HT20	Top Side	0	6	Ant 1+2	0	23.79	24	99.37	0.001	0.00
	WLAN 2.4G	802.11n HT20	Bottom Side	0	6	Ant 1+2	0.04	23.79	24	99.37	0.228	0.24
1	WLAN 2.4G	802.11b	Left Side	0	1	Ant 1	-0.01	20.69	21	99.11	0.792	0.86
	WLAN 2.4G	802.11b	Left Side	0	11	Ant 1	0.18	21.29	21.5	99.11	0.564	0.60
	WLAN 2.4G	802.11b	Left Side	0	12	Ant 1	-0.06	19.28	19.5	99.11	0.435	0.46
	WLAN 2.4G	802.11b	Left Side	0	13	Ant 1	0.19	17.34	17.5	99.11	0.278	0.29
	Bluetooth	BDR	Rear Face	0	0	Ant 2	0	9.38	9.75	76.91	0.001	0.00
	Bluetooth	BDR	Left Side	0	0	Ant 2	0	9.38	9.75	76.91	0.001	0.00
	Bluetooth	BDR	Right Side	0	0	Ant 2	0.04	9.38	9.75	76.91	0.041	0.06
	Bluetooth	BDR	Top Side	0	0	Ant 2	0	9.38	9.75	76.91	0.001	0.00
	Bluetooth	BDR	Bottom Side	0	0	Ant 2	0	9.38	9.75	76.91	0.001	0.00
	Bluetooth	BDR	Right Side	0	39	Ant 2	-0.03	9.11	9.75	76.91	0.043	0.06
2	Bluetooth	BDR	Right Side	0	78	Ant 2	0.08	8.36	10	76.91	0.038	0.07

## 10.6 Measurement Variability

According to KDB 865664 D01v01r04, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium.

The following procedures are applied to determine if repeated measurements are required:

1. The original highest measured Reported SAR 1-g is  $\geq 0.80$  W/kg, repeated that measurement once.
2. Perform a second repeated measurement the ratio of the largest to the smallest SAR for the original and first repeated measurements is  $< 1.2$  W/kg, or when the original or repeated measurement is  $\geq 1.45$  W/kg (~10% from the 1-g SAR limit).

Since all measured values are under limits, no variability is required.

## 10.7 Requirements on the Uncertainty Evaluation

Decision Rule

- Uncertainty is not included.
- Uncertainty is included.

The highest measured 1-g SAR is less than 1.5 W/kg and the highest measured 10-g SAR is less than 3.75 W/kg.

Therefore, per KDB Publication 865664 D01, the extended measurement uncertainty analysis described in IEEE 1528-2013 and IEC/IEEE 62209-1528 is not required.

## 11. Conclusion

The SAR test values found for the device are separately below the maximum limit of 1.6 W/kg.

\*\*\*\*\* End of Report \*\*\*\*\*