

# ELEMENT MATERIALS TECHNOLOGY

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# WIFI 6 GHZ RF EXPOSURE EVALUATION

**Applicant Name** 

Sony Corporation 1-7-1 Konan Minato-ku Tokyo, 108-0075, Japan Date of Testing 03/31/2022 – 04/13/2022 Test Site/Location Element, Columbia, MD, USA Document Serial No: 1M2201200003-09.PY7 (Rev 1)

FCC ID:	PY7-57325M
APPLICANT:	SONY CORPORATION

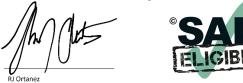
DUT Type:	Portable Handset
Application Type:	Certification
FCC Rule Part(s):	CFR §2.1093

	Tx Frequency		SAR			APD		PD
Band & Mode	MHz	1g Head (W/kg)	1g Body-worn (W/kg)	10g Phablet (W/kg)	Head (W/m <sup>2</sup> )	Body-worn (W/m²)	Phablet (W/m <sup>2</sup> )	psPD (W/m²)
WIFI 6 GHz	5955-7115	0.137	<0.1	0.304	0.807	0.408	6.230	4.444

Values above represent RF exposure evaluations during MIMO operations.

Note: This revised Test Report supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.





Executive Vice President

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# **1** DEVICE UNDER TEST

#### 1.1 Device Overview

Band & Mode	Tx Frequency
U-NII-5	5955 - 6415 MHz
U-NII-6	6435 - 6525 MHz
U-NII-7	6535 - 6875 MHz
U-NII-8	6895 - 7115 MHz

# 1.2 Nominal and Maximum Output Power Specifications

The 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.

1	.2.	1
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# Maximum MIMO WLAN Output Power

	IEEE 802.1	1 (in dBm)		
	MIMO			
Mode	a (CDD + STBC)	ax (SU) (CDD + STBC, SDM)		
	Maximum	Maximum		
6 GHz WIFI (20MHz BW)	12.0	12.0		
	Ch. 233: 6.5	Ch. 233: 6.5		
6 GHz WIFI (40MHz BW)		14.5		
		Ch. 227: 14		
6 GHz WIFI (80MHz BW)		14.5		
6 GHz WIFI (160MHz BW)		14.5		

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# 1.2.2 Reduced MIMO WLAN Output Power

The below table is applicable during Simultaneous Conditions with 2.4 GHz and 6 GHz WLAN.

	IEEE 802.1	1 (in dBm)		
	МІМО			
Mode	a (CDD + STBC)	ax (SU) (CDD + STBC, SDM)		
	Maximum	Maximum		
6 GHz WIFI (20MHz BW)	12.0	12.0		
	Ch. 233: 6.5	Ch. 233: 6.5		
6 GHz WIFI (40MHz BW)		12.5		
6 GHz WIFI (80MHz BW)		12.5		
6 GHz WIFI (160MHz BW)		12.5		

1.2.3	Maximum 802.11ax RU WLAN Output Power
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IEEE 802.11ax RU (in dBm)							
	ΜΙΜΟ						
Tones	6GHz 20MHz	6GHz 40MHz	6GHz 80MHz	6GHz 160MHz			
TOHES	Maximum	Maximum	Maximum	Maximum			
26T	2.0	2.0	2.0	2.0			
52T	5.0	5.0	5.0	5.0			
106T	8.0	8.0	8.0	8.0			
1001	Ch. 233: 7	Ch. 227: 7	Ch. 215: 7	Ch. 207: 7			
242T	12.0	10.0	10.0	12.0			
2421	Ch. 233: 6.5	12.0	12.0	Ch. 207: 11.5			
484T		10.0	10.0	12.0			
404		12.0 12.0	12.0	Ch. 207: 11.5			
996T			12.0	12.0			
3901			12.0	Ch. 207: 11.5			

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# 1.3 DUT Antenna Locations

The overall dimensions of this device are > 9 x 5 cm. A diagram showing the location of the device antennas can be found in SAR Part 1 Report Appendix L. Since the diagonal dimension of this device is > 160 mm and <200 mm, it is considered a "phablet." Exact antenna dimensions and separation distances are shown in the Technical Descriptions in the FCC filing

Tab	le 1-1
Device	Surfaces

Device Sides/Edges for Testing							
Mode Back Front Top Bottom Right Left							
6 GHz WLAN MIMO Yes Yes Yes Yes No Yes							

Note: Particular DUT edges were not required to be evaluated for phablet SAR if the edges were greater than 2.5 cm from the transmitting antenna according to FCC KDB Publication 648474 D04v01r03. The distances between the transmit antennas and the edges of the device are included in the filing. Wireless router mode is disabled for all 6 GHz WLAN operations.

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# 1.4 Miscellaneous Testing Considerations

Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. FCC KDB 648474 and FCC KDB 248227 were followed for test positions, distances, and modes. Per TCB workshop October 2020 notes, 5 channels were tested. Absorbed power density (APD) using a 4cm<sup>2</sup> averaging area is reported based on SAR measurements. Incident power density is evaluated at 2mm ensuring that the resolution is sufficient such that integrated power density (iPD) between d=2mm and d= $\lambda$ /5mm is  $\geq$  -1dB per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%.

Per FCC KDB Publication 648474 D04v01r03, this device is considered a "phablet" since the diagonal dimension is greater than 160mm and less than 200mm. Therefore, phablet SAR tests are required when wireless router mode does not apply or if wireless router 1g SAR > 1.2 W/kg.

6 GHz WIFI SAR results are used for simultaneous transmission analysis with the other transmitters and total exposure ratio (TER). Analysis can be found in SAR report and Near Field PD Report.

To make the most efficient use of the additional available subcarriers (data tones), IEEE 802.11ax can utilize Orthogonal Frequency-Division Multiple Access (OFDMA) which divides the existing 802.11 channels into smaller subchannels called Resource Units (RUs). Possible RU sizes are: 26T, 52T, 106T, 242T, 484T and 996T.

Per FCC Guidance, 802.11ax RU was considered a higher order 802.11 mode when compared to a/b/g/n/ac to apply KDB Publication 248227 D01v02r02 for OFDM mode selection. Therefore, SAR tests were not required for 802.11ax RU based on the maximum allowed output powers of OFDM modes and the reported SAR values. Per FCC Guidance, maximum conducted powers were performed for each RU size to demonstrate that the output powers would not be higher than the other OFDM 802.11 modes. Please see Appendix G for 802.11ax RU output powers.

# 1.5 Guidance Applied

- November 2017, October 2018, April 2019, November 2019, October 2020 TCBC Workshop Notes
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Feb 2022)
- IEEE 1528-2013
- IEC TR 63170:2018
- IEC 62479:2010
- FCC KDB 865664 D02 v01r02
- FCC KDB 648474 D04 v01r03
- FCC KDB 248227 D01 v02r02
- FCC KDB 447498 D01 v06
- FCC KDB 865664 D01 v01r04
- April 2019 TCB Workshop Notes (IEEE 802.11ax)

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# 2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development 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. [15]

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 C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [44] and Health Canada RF Exposure Guidelines Safety Code 6 [35]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [17] is used for guidance in measuring the Specific Absorption Rate (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 International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. 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.

# 2.1 SAR Definition

Specific Absorption Rate 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 ( $\rho$ ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

Equation 2-1 SAR Mathematical Equation

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

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 <sup>3</sup> )
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 relation 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.[20]

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# **3** DASY E-FIELD PROBE SYSTEM

#### 3.1 Probe Measurement System



Figure 4-1 SAR System

The SAR measurements were conducted with the dosimetric probe designed in the classical triangular configuration (see Figure 4-3) 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 DASY5 software reads the reflection during a software approach and looks for the maximum using a 2nd order curve fitting. The approach is stopped at reaching the maximum.

#### 3.2 **Probe Specifications**

Model(s):	ES3DV2, ES3DV3, EX3DV4
Frequency	10 MHz – 6.0 GHz (EX3DV4)
Range:	10 MHz – 4 GHz (ES3DV3, ES3DV2)
Calibration:	In head and body simulating tissue at Frequencies from 300 up to 6000MHz
Linearity:	± 0.2 dB (30 MHz to 6 GHz) for EX3DV4
	± 0.2 dB (30 MHz to 4 GHz) for ES3DV3, ES3DV2
Dynamic Range:	10 mW/kg – 100 W/kg
Probe Length:	330 mm
Probe Tip Length:	20 mm
Body Diameter:	12 mm
Tip Diameter:	2.5 mm for EX3DV4, 3.9mm for ES3DV3, ES3DV2

**Tip-Center:**1 mm for EX3DV4, 2.0 mm for ES3DV3, ES3DV2



Figure 4-2 Near-Field Probe



Figure 4-3 Triangular Probe Configuration

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# 4 DOSIMETRIC ASSESSMENT

#### 4.1 Measurement Procedure

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEC/IEEE 62209-1528:2020:

- 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 4-1) and IEC/IEEE 62209-1528:2020.
- 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.

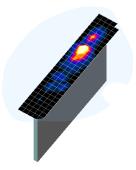


Figure 4-1 Sample SAR Area Scan

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 4-1) and IEC/IEEE 62209-1528:2020. 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 4-1. 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 ( $10 \times 10 \times 10$ ) 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.

-	Maximum Area Scan			Maximum Zoom Scan Spatial Resolution (mm)			
Frequency	Resolution (mm) (Δx <sub>area</sub> , Δy <sub>area</sub> )	Resolution (mm) (Δx <sub>200m</sub> , Δy <sub>200m</sub> )	Uniform Grid	Graded Grid		Volume (mm) (x,y,z)	
			∆z <sub>zoom</sub> (n)	$\Delta z_{zoom}(1)^*$	$\Delta z_{zoom}(n>1)^*$		
≤ 2 GHz	≤ 15	≤8	≤5	≤4	≤ 1.5*Δz <sub>zoom</sub> (n-1)	≥ 30	
2-3 GHz	≤ 12	≤5	≤5	≤4	≤ 1.5*∆z <sub>zoom</sub> (n-1)	≥ 30	
3-4 GHz	≤ 12	≤5	≤ 4	≤3	≤ 1.5*∆z <sub>zoom</sub> (n-1)	≥ 28	
4-5 GHz	≤ 10	≤4	≤3	≤ 2.5	≤1.5*Δz <sub>zoom</sub> (n-1)	≥ 25	
5-6 GHz	≤ 10	≤4	≤2	≤2	≤ 1.5*Δz <sub>zoom</sub> (n-1)	≥ 22	

Table 4-1 Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04\*

\*Also compliant to IEC/IEEE 62209-1528:2020 Table 3 and 4

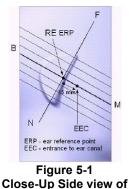
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# 5 DEFINITION OF REFERENCE POINTS

# 5.1 EAR REFERENCE POINT

Figure 5-2 shows the front, back and side views of the SAM Twin Phantom. The point "M" is the reference point for the center of the mouth, "LE" is the left ear reference point (ERP), and "RE" is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 5-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front), also called the Reference Pivoting Line, is not perpendicular to the reference plane (see Figure 5-1). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning **[18]**.



ERP

# 5.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the

acoustic output located along the "vertical centerline" on the front of the device aligned to the "ear reference point" (See Figure 5-3). The acoustic output was than located at the same level as the center of the ear reference point. The test device was positioned so that the "vertical centerline" was bisecting the front surface of the handset at its top and bottom edges, positioning the "ear reference point" on the outer surface of the both the left and right head phantoms on the ear reference point.



Figure 5-2 Front, back and side view of SAM Twin Phantom

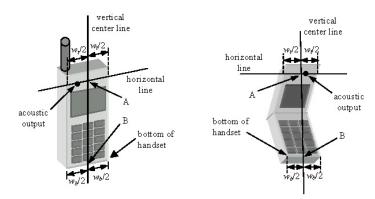


Figure 5-3 Handset Vertical Center & Horizontal Line Reference Points

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# 6 TEST CONFIGURATION POSITIONS

#### 6.1 Device Holder

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\varepsilon$  = 3 and loss tangent  $\delta$  = 0.02.

#### 6.2 **Positioning for Cheek**

1. The test device was positioned with the device close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 6-1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.



Figure 6-1 Front, Side and Top View of Cheek Position

- 2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the pinna.
- 3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the reference plane.
- 4. The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical was respect to the line NF.
- 5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the device contact with the ear, the device was rotated about the NF line until any point on the handset made contact with a phantom point below the ear (cheek) (See Figure 6-2).

# 6.3 Positioning for Ear / 15° Tilt

With the test device aligned in the "Cheek Position":

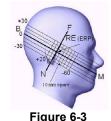
- 1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degrees.
- 2. The phone was then rotated around the horizontal line by 15 degrees.
- 3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the handset touched the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. In this situation, the tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 6-2).

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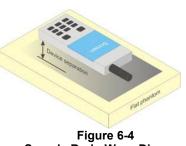
Figure 6-2 Front, Side and Top View of Ear/15° Tilt Position



Side view w/ relevant markings

#### 6.4 **Body-Worn Accessory Configurations**

Body-worn operating configurations are tested with the belt-clips and holsters attached to the device and positioned against a flat phantom in a normal use configuration (see Figure 6-4). Per FCC KDB Publication 648474 D04v01r03, Body-worn accessory exposure is typically related to voice mode operations when handsets are carried in body-worn accessories. The body-worn accessory procedures in FCC KDB Publication 447498 D01v06 should be used to test for body-worn accessory SAR compliance, without a headset connected to it. This enables the test results for such configuration to be compatible with that required for hotspot mode when the body-worn accessory test separation



Sample Body-Worn Diagram

distance is greater than or equal to that required for hotspot mode, when applicable. When the reported SAR for a body-worn accessory, measured without a headset connected to the handset, is > 1.2 W/kg, the highest reported SAR configuration for that wireless mode and frequency band should be repeated for that body-worn accessory with a headset attached to the handset.

Accessories for Body-worn operation configurations are divided into two categories: those that do not contain metallic components and those that do contain metallic components. When multiple accessories that do not contain metallic components are supplied with the device, the device is tested with only the accessory that dictates the closest spacing to the body. Then multiple accessories that contain metallic components are tested with the device with each accessory. If multiple accessories share an identical metallic component (i.e. the same metallic belt-clip used with different holsters with no other metallic components) only the accessory that dictates the closest spacing to the body is tested.

Body-worn accessories may not always be supplied or available as options for some devices intended to be authorized for body-worn use. In this case, a test configuration with a separation distance between the back of the device and the flat phantom is used. Test position spacing was documented.

Transmitters that are designed to operate in front of a person's face, as in push-to-talk configurations, are tested for SAR compliance with the front of the device positioned to face the flat phantom in head fluid. For devices that are carried next to the body such as a shoulder, waist or chest-worn transmitters, SAR compliance is tested with the accessories, including headsets and microphones, attached to the device, and positioned against a flat phantom in a normal use configuration.

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# 6.5 Extremity Exposure Configurations

Devices that are designed or intended for use on extremities or mainly operated in extremity only exposure conditions, i.e., hands, wrists, feet and ankles, may require extremity SAR evaluation. When the device also operates in close proximity to the user's body, SAR compliance for the body is also required. The 1g body and 10g extremity SAR Exclusion Thresholds found in KDB Publication 447498 D01v06 should be applied to determine SAR test requirements.

Per KDB Publication 447498 D01v06, Cell phones (handsets) are not normally designed to be used on extremities or operated in extremity only exposure conditions. The maximum output power levels of handsets generally do not require extremity SAR testing to show compliance. Therefore, extremity SAR was not evaluated for this device.

# 6.6 Phablet Configurations

For smart phones with a display diagonal dimension > 150 mm or an overall diagonal dimension > 160 mm that provide similar mobile web access and multimedia support found in mini-tablets or UMPC mini-tablets that support voice calls next to the ear, the phablets procedures outlined in KDB Publication 648474 D04v01r03 should be applied to evaluate SAR compliance. A device marketed as phablets, regardless of form factors and operating characteristics must be tested as a phablet to determine SAR compliance. In addition to the normally required head and body-worn accessory SAR test procedures required for handsets, the UMPC mini-tablet procedures must also be applied to test the SAR of all surfaces and edges with an antenna <=25 mm from that surface or edge, in direct contact with the phantom, for 10g SAR. The UMPC mini-tablet 1g SAR at 5 mm is not required. When hotspot mode applies, 10g SAR is required only for the surfaces and edges with hotspot mode 1g SAR > 1.2 W/kg.

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# 7 RF EXPOSURE LIMITS

# 7.1 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.

# 7.2 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 applicable to situations in which persons are exposed as a consequence of their 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.

# 7.3 RF Exposure Limits for Frequencies Below 6 GHz

HUMAN EXPOSURE LIMITS				
	UNCONTROLLED ENVIRONMENT General Population (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT Occupational (W/kg) or (mW/g)		
<b>Peak Spatial Average SAR</b> Head	1.6	8.0		
Whole Body SAR	0.08	0.4		
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20		

 Table 7-1

 SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

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.

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#### **RF Exposure Limits for Frequencies Above 6 GHz** 7.4

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m<sup>2</sup> or mW/cm<sup>2</sup>.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm<sup>2</sup> per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Frequency Range [MHz]Power Density [mW/cm²]Average Time [Minutes]					
For Occupational / Controlled E	nvironments				
1,500 – 100,000 5.0 6					
(B) Limits For General Population / Uncontrolled Environments					
1.0	30				
(	[mW/cm²] For Occupational / Controlled E 5.0 General Population / Uncontrolle				

Table 7.2

Note: 1.0 mW/cm<sup>2</sup> is 10 W/m<sup>2</sup>

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# 8 MEASUREMENT PROCEDURES

#### 8.1 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. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. 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.

# 8.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations of 802.11 transmitters are not suitable for SAR measurements. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset-based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 D01v02r02 for more details.

# 8.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters.

A periodic duty factor is required for current generation SAR systems to measure SAR. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

# 8.2.2 Initial Test Position Procedure

For exposure conditions with multiple test positions, such as handset operating next to the ear, devices with hotspot mode or UMPC mini-tablet, procedures for initial test position can be applied. Using the transmission mode determined by the DSSS procedure or initial test configuration, area scans are measured for all positions in an exposure condition. The test position with the highest extrapolated (peak) SAR is used as the initial test position. When reported SAR for the initial test position is  $\leq 0.4$  W/kg, no additional testing for the remaining test positions is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is  $\leq 0.8$  W/kg or all test positions are measured. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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# 8.2.3 OFDM Transmission Mode and SAR Test Channel Selection

When the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11a, 802.11n and 802.11ac or 802.11g and 802.11n with the same channel bandwidth, modulation and data rate etc., the lower order 802.11 mode i.e., 802.11a, then 802.11n and 802.11ac or 802.11g then 802.11n, is used for SAR measurement. Per April 2019 TCB Workshop guidance, 802.11ax was considered the highest order 802.11 mode. When the maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

# 8.2.4 Initial Test Configuration Procedure

For OFDM, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order IEEE 802.11 mode. The channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is  $\leq 0.8$  W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is  $\leq 1.2$  W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements (See Section 8.2.3). When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

# 8.2.5 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is  $\leq 1.2$  W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

# 8.2.6 MIMO SAR Considerations

Per KDB Publication 248227 D01v02r02, the simultaneous SAR provisions in KDB Publication 447498 D01v06 should be applied to determine simultaneous transmission SAR test exclusion for WIFI MIMO. If the sum of 1g single transmission chain SAR measurements is <1.6 W/kg, no additional SAR measurements for MIMO are required. Alternatively, SAR for MIMO can be measured with all antennas transmitting simultaneously at the specified maximum output power of MIMO operation. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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# 9 RF CONDUCTED POWERS

Table 9-16 GHz WLAN Maximum Average RF Power – 802.11a 20 MHz BW6GHz (20MHz) 802.11a Conducted Power [dBm]				
Freq [MHz]	Channel	ANT1	ANT2	MIMO
6075	25	8.48	8.77	11.64
6275	65	8.4	8.76	11.59
6475	105	7.95	8.71	11.36
6675	145	8.09	8.99	11.57
6995	209	8.48	8.99	11.75

Table	9-2
-------	-----

6 GHz WLAN Maximum Average RF Power – 802.11ax 20 MHz BW

6GHZ (20MHZ) 802. That Conducted Power [dBm]							
Freq [MHz]	Channel	ANT1	ANT2	MIMO			
6075	25	8.21	8.52	11.38			
6275	65	8.34	8.68	11.52			
6475	105	8.08	8.53	11.32			
6675	145	8.01	8.94	11.51			
6995	209	8.38	8.95	11.68			

Table	9-3
-------	-----

6 GHz WLAN Maximum Average RF Power – 802.11ax 40 MHz BW

6GHz (40MHz) 802.11ax Conducted Power [dBm]							
Freq [MHz]	Channel	ANT2	MIMO				
6085	27	10.95	11.04	14.01			
6285	67	10.5	11.11	13.83			
6485	107	10.54	11.21	13.90			
6685	147	10.59	11.25	13.94			
7005	211	10.95	11.49	14.24			

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6GH	6GHz (80MHz) 802.11ax Conducted Power [dBm]							
Freq [MHz]	Freq [MHz] Channel ANT1 ANT2							
6065	23	11.17	11.15	14.17				
6305	71	11.11	10.86	14.00				
6545	119	10.97	11.49	14.25				
6785	167	11.32	10.91	14.13				
7025	215	11.03	11.19	14.12				

 Table 9-4

 6 GHz WLAN Maximum Average RF Power – 802.11ax 80 MHz BW

 Table 9-5

 6 GHz WLAN Reduced Average RF Power – 802.11ax 80 MHz BW

 6GHz (80MHz) 802.11ax Conducted Power [dBm]

Freq [MHz]	Channel	ANT1	ANT2	MIMO		
6065	23	9.25	9.3	12.29		
6305	71	9.29	9.4	12.36		
6545	119	9.28	9.27	12.29		
6785	167	9.27	9.2	12.25		
7025	215	9.47	9.45	12.47		

Table 9-6

6 GHz WLAN Maximum Average RF Power – 802.11ax 160 MHz BW

6GHz (160MHz) 802.11ax Conducted Power [dBm]							
Freq [MHz]	Channel	ANT1	ANT2	ΜΙΜΟ			
6025	15	11.29	10.62	13.98			
6345	79	11.46	11.4	14.44			
6505	111	11.37	11.3	14.35			
6825	175	11.27	10.4	13.87			
6985	207	11.09	11.15	14.13			

Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.

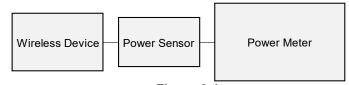


Figure 9-1 Power Measurement Setup

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#### 10 SYSTEM VERIFICATION

#### 10.1 SAR Test System Verification

#### Table 10-1 **Measured Tissue Properties** Calibrated for Tissue Temp TARGET TARGET Measured Measured Measured Tissue Conductivity, Dielectric Conductivity, Dielectric Durina Frequency % dev σ % dev ε Tests Туре Calibration (°C) (MHz) σ (S/m) Constant, ɛ σ (S/m) Constant, Performed on 5935 5.263 34.666 5.411 35.143 -2.74% -1.36% 5.291 34.518 5970 5.448 35.120 -2.88% -1.71% 5985 5.318 34.502 5.464 35.110 -2.67% -1.73% 6000 5.327 34.460 5.480 35.100 -2.79% -1.82% 35.070 -2.96% -1.95% 6025 34.387 5.510 5.347 6065 5.397 34.312 5.557 35.022 -2.88% -2.03% 5.418 34,281 5 569 -2.71% -2.08% 6075 35.010 6085 5.436 34.248 5.580 34.998 -2.58% -2.14% -2.17% -2.33% 6275 5.679 33.959 5.805 34.770 6285 5.682 33.941 5.816 34.758 -2.30% -2.35% 6305 5.700 33.938 5.840 34.734 -2.40% -2.29% 5.754 33.883 5.887 34.686 -2.26% -2.32% 6345 5.913 -2.12% -2.15% 6475 33.788 6.041 34.530 04/04/2022 6500 Head 21.6 6485 5,915 6.052 -2.26% -2.18% 33.766 34.518 -2.44% -2.50% 6500 5.922 33.638 6.070 34.500 5,930 33.622 -2.40% -2.53% 6505 6.076 34.494 6545 5.990 33.466 6.122 34.446 -2.16% -2.85% 6675 6.171 33.324 6.273 34.290 -1.63% -2.82% -1.62% -2.79% 6685 6.285 34.278 6.183 33.322 6715 6.204 33,254 6.319 34.242 -1.82% -2.89% 6785 6.298 33.240 6.400 34.158 -1.59% -2.69% 6825 6.299 33.115 6.447 34.110 -2.30% -2.92% -3.36% -2.11% 6985 6.493 32.777 33.918 6.633 6995 6.494 32.746 6.644 33.906 -2.26% -3.42% 32,723 7000 6.496 6.650 33.900 -2.32% -3.47% 7005 6.497 32.700 6.656 33.894 -2.39% -3.52% 7025 6.502 32.608 6.680 33.870 -2.66% -3.73% 5935 5.440 34.651 5.411 35.143 0.54% -1.40% 5970 5.485 34.596 5.448 35.120 0.68% -1.49% 5985 5.502 34.575 5.464 35.110 0.70% -1.52% 6000 5.527 34.571 5.480 35.100 0.86% -1.51% 0.76% -1.59% 6025 5.552 34.513 5.510 35.070 34.449 35.022 0.88% -1.64% 6065 5.606 5.557 5.622 34 434 5 569 0.95% -1.65% 6075 35.010 6085 5.634 34.401 5.580 34.998 0.97% -1.71% 6275 5.876 34.055 5.805 34.770 1.22% -2.06% -2.10% 5.816 1.05% 6285 5.877 34.029 34.758 6305 34.017 5.840 34.734 0.87% -2.06% 5.891 5.948 -2.08% 33.965 5.887 1.04% 6345 34.686 1.09% -2.17% 6475 6.107 33.782 6.041 34.530 04/07/2022 6500 Head 21.2 0.96% -2.33% 6485 6.110 33.714 6.052 34.518 33.710 6.070 0.74% -2.29% 6500 6.115 34.500 33,707 0.72% -2.28% 6505 6.120 6.076 34.494 6545 6.198 33.607 6.122 34.446 1.24% -2.44% 6675 6.349 33.399 6.273 34.290 1.21% -2.60% 1.19% -2.58% 6685 6.285 34.278 6.360 33.392 6715 6.391 33,293 6.319 34.242 1.14% -2.77% 6785 6.465 33.223 6.400 34.158 1.02% -2.74% 6825 6.490 33.160 6.447 34.110 0.67% -2.79% 1.04% -3.19% 6.702 32.837 6985 6.633 33.918 6.644 -3.19% 6995 6.704 32.823 33.906 0.90% 32.821 0.83% -3.18% 7000 6.705 6.650 33.900 -3.17% 7005 6.706 32.818 6.656 33.894 0.75% -3.20%

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32.787

6.680

33.870

0.67%

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6.725

7025



			Weasureu	Tissue Prop	erties (cont	./			
Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ε	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ε	% dev σ	% dev ε
			5935	5.539	35.030	5.411	35.143	2.37%	-0.32%
			5970	5.568	34.875	5.448	35.120	2.20%	-0.70%
			5985	5.603	34.823	5.464	35.110	2.54%	-0.82%
			6000	5.609	34.819	5.480	35.100	2.35%	-0.80%
			6025	5.617	34.763	5.510	35.070	1.94%	-0.88%
			6065	5.665	34.666	5.557	35.022	1.94%	-1.02%
			6075	5.686	34.625	5.569	35.010	2.10%	-1.10%
			6085	5.709	34.591	5.580	34.998	2.31%	-1.16%
			6275	5.961	34.286	5.805	34.770	2.69%	-1.39%
			6285	5.962	34.278	5.816	34.758	2.51%	-1.38%
			6305	5.991	34.261	5.840	34.734	2.59%	-1.36%
		20.5	6345	6.040	34.213	5.887	34.686	2.60%	-1.36%
			6475	6.196	33.888	6.041	34.530	2.57%	-1.86%
04/11/2022	6500 Head		6485	6.200	33.880	6.052	34.518	2.45%	-1.85%
			6500	6.209	33.823	6.070	34.500	2.29%	-1.96%
			6505	6.213	33.821	6.076	34.494	2.25%	-1.95%
			6545	6.270	33.734	6.122	34.446	2.42%	-2.07%
			6675	6.448	33.575	6.273	34.290	2.79%	-2.09%
			6685	6.456	33.574	6.285	34.278	2.72%	-2.05%
			6715	6.474	33.459	6.319	34.242	2.45%	-2.29%
			6785	6.567	33.438	6.400	34.158	2.61%	-2.11%
			6825	6.569	33.313	6.447	34.110	1.89%	-2.34%
			6985	6.776	32.984	6.633	33.918	2.16%	-2.75%
		6995	6.781	32.956	6.644	33.906	2.06%	-2.80%	
			7000	6.784	32.934	6.650	33.900	2.02%	-2.85%
			7005	6.784	32.911	6.656	33.894	1.92%	-2.90%
			7025	6.788	32.806	6.680	33.870	1.62%	-3.14%
			6065	5.631	34.693	5.557	35.022	1.33%	-0.94%
			6305	5.950	34.252	5.840	34.734	1.88%	-1.39%
04/12/2022		23.5	6500	6.155	33.876	6.070	34.500	1.40%	-1.81%
04/13/2022	6500 Head	23.3	6545	6.219	33.694	6.122	34.446	1.58%	-2.18%
			6785	6.510	33.485	6.400	34.158	1.72%	-1.97%
			7025	6.665	32.641	6.680	33.870	-0.22%	-3.63%

Table 10-2 Measured Tissue Properties (cont.)

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 Publication 865664 D01v01r04 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.

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Prior to SAR assessment, the system is verified to  $\pm 10\%$  of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in Appendix E.

	Table 10-3	
System	Verification	Results
	System Varification	

	System Verification																			
	TARGET & MEASURED																			
SAR System #	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Source SN	Probe SN	Measured SAR19 (W/kg)	1 W Target SAR <sub>1g</sub> (W/kg)	1 W Normalized SAR <sub>1g</sub> (W/kg)	Deviation <sub>1g</sub> (%)	Measured SAR <sub>10g</sub> (W/kg)	1 W Target SAR <sub>10g</sub> (W/kg)	1 W Normalized SAR <sup>10g</sup> (W/kg)	Deviation <sub>10g</sub> (%)	Measured 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	1W Target 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	1 W Normalized 4cm <sup>2</sup> APD (W/m <sup>2</sup> )	Deviation 4cm <sup>2</sup> APD (%)
м	6500	Head	04/04/2022	21.9	21.5	0.050	1018	7551	13.700	290.000	274.000	-5.52%	2.550	53.200	51.000	-4.14%	62.1000	1310.0000	1242.000	-5.19%
М	6500	Head	04/07/2022	22.5	21.5	0.050	1018	7551	14.000	290.000	280.000	-3.45%	2.600	53.200	52.000	-2.26%	63.3000	1310.0000	1266.000	-3.36%
М	6500	Head	04/11/2022	21.7	20.8	0.050	1018	7551	13.700	290.000	274.000	-5.52%	2.540	53.200	50.800	-4.51%	61.9000	1310.0000	1238.000	-5.50%
М	6500	Head	04/13/2022	23.5	23.5	0.050	1018	7551	14.300	290.000	286.000	-1.38%	2.630	53.200	52.600	-1.13%	64.5000	1310.0000	1290.000	-1.53%

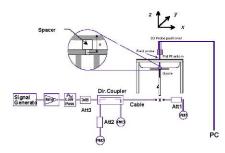


Figure 10-1 System Verification Setup Diagram



Figure 10-2 System Verification Setup Photo

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# 10.2 Power Density Test System Verification

The system was verified to be within  $\pm 0.66$  dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

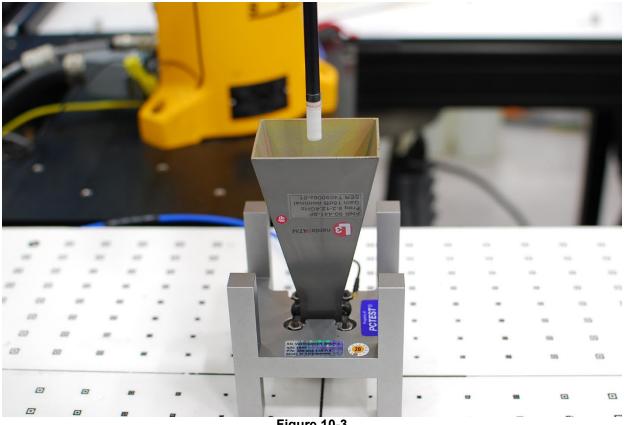


Figure 10-3 System Verification Setup Photo

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Table 10-4
<b>10 GHz Verifications</b>

	System Verification												
System	Frequency	Date	Source	Probe	Prad	Normal psPD (W/m <sup>2</sup> over 4 cm <sup>2</sup> ) Deviation (dB) Total psPD (W/m <sup>2</sup> over 4 cm <sup>2</sup> ) Deviation			Normal psPD (W/m <sup>2</sup> over 4 cm <sup>2</sup> ) Deviation (dB) Total psPD (W/m <sup>2</sup> over 4		Deviation (dB)		
System	(GHz)	Dute	S/N	S/N	(mW)	Measured	Target	Deviation (ub)	Measured	Target	Deviation (ub)		
Q	10	03/31/2022	1004	9389	86.1	47.40	50.70 -0.29 48.30 50.70		50.70	-0.21			
R	10	04/05/2022	1004	9407	86.1	51.50	50.70	0.07	51.70	50.70	0.08		
R	10	04/07/2022	1004	9407	86.1	49.00	50.70	-0.15	49.30	50.70	-0.12		

Note: A 10 mm distance spacing was used from the reference horn antenna aperture to the probe element.

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# 11 DATA SUMMARY

# 11.1 SAR and Absorbed Power Density Results

#### Table 11-1 6 GHz WLAN Head MIMO SAR

	MEASUREMENT RESULTS																			
FREQU	IENCY	Mode	Service	Bandwidth [MHz]	Maximum Allowed Power	Conducted Power (Ant 1) [dBm]	Maximum Allowed Power (Ant 2) [dBm]	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Side	Test Position	Antenna Config.	Device Serial Number	Data Rate (Mbps)	Duty Cycle	SAR (1g)	Scaling Factor (Power)	Scaling Factor (Duty	Reported SAR (1g)	Piot#
MHz	Ch.				(Ant 1) [dBm]		(Ant 2) [dBm]					-				(W/kg)	(Power)	Cycle)	(W/kg)	
6065.00	23	802.11ax	OFDM	80	11.5	11.17	11.5	11.15	0.15	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.126	1.084	1.003	0.137	A1
6305.00	71	802.11ax	OFDM	80	11.5	11.11	11.5	10.86	0.09	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.096	1.159	1.003	0.112	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.16	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.065	1.130	1.003	0.074	
6785.00	167	802.11ax	OFDM	80	11.5	11.32	11.5	10.91	0.19	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.027	1.146	1.003	0.031	
7025.00	215	802.11ax	OFDM	80	11.5	11.03	11.5	11.19	-0.13	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.007	1.114	1.003	0.008	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.03	Right	Tilt	MIMO	QV77001XAZ	68.1	99.7	0.014	1.130	1.003	0.016	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.06	0.06 Left Cheek MIMO QV77001XAZ 68.1 99.7 0.024 1.130 1.003 0.02								0.027		
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.06	Left	Tilt	MIMO	QV77001XAZ	68.1	99.7	0.016	1.130	1.003	0.018	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT									Head										
					Spatial Peak									1.6 \	V/kg (mW/g	)				
	Uncontrolled Exposure/General Population averaged over 1 gram																			

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

# Table 11-2 6 GHz WLAN Head MIMO SAR Reduced for simultaneous conditions with 2.4 GHz WLAN

	MEASUREMENT RESULTS																			
FREQU	ENCY	Mode	Service	Bandwidth [MHz]	Maximum Allowed Power	Conducted Power (Ant 1) [dBm]	Allowed Power	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Side	Test Position	Antenna Config.	Device Serial Number	Data Rate (Mbps)	Duty Cycle	SAR (1g)	Scaling Factor	Scaling Factor (Duty	Reported SAR (1g)	Plot #
MHz	Ch.				(Ant 1) [dBm]		(Ant 2) [dBm]									(W/kg)	(Power)	Cycle)	(W/kg)	
7025.00	215	802.11ax	OFDM	80	9.5	9.47	9.5	9.45	0.13	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.000	1.012	1.003	0.000	
7025.00	215	802.11ax	OFDM	80	9.5	9.47	9.5	9.45	-0.11	Right	Tilt	MIMO	QV77001XAZ	68.1	99.7	0.000	1.012	1.003	0.000	
7025.00	215	802.11ax	OFDM	80	9.5	9.47	9.5	9.45	0.00	Left	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.002	1.012	1.003	0.002	
7025.00	215	802.11ax	OFDM	80	9.5	9.47	9.5	9.45	0.13	0.13 Left Tilt MIMO QV77001XAZ 68.1 99.7 0.003 1.012 1.003 0.003							0.003			
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Hoad																				
					Spatial Peak					1.6 W/kg (mW/g)										
			U	ncontrolled	Exposure/Gene	ral Population				averaged over 1 gram										

Note: To achieve the 12.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 9.5 dBm.

Table 11-3	
6 GHz WLAN Body-worn MIMO SA	R

	MEASUREMENT RESULTS																			
FREQU	JENCY	Mode	Service	Bandwidth [MHz]	Maximum Allowed Power (Ant 1) [dBm]	Conducted Power (Ant 1) [dBm]	Maximum Allowed Power (Ant 2) [dBm]	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Spacing (mm)	Antenna Config.	Device Serial Number	Data Rate (Mbps)	Side	Duty Cycle	SAR (1g)	Scaling Factor (Power)	Scaling Factor (Duty	Reported SAR (1g)	Plot#
MHz	Ch.				(Ant 1) [dBm]		(Ant 2) [dBm]				-					(W/kg)	(Power)	Cycle)	(W/kg)	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.16	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.054	1.130	1.003	0.061	A2
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.00	10	MIMO	QV77001XAZ	68.1	Front	99.7	0.007	1.130	1.003	0.008	
				ANSI / IEEE	C95.1 1992 - SA	AFETY LIMIT	-	•		Body										
	Spatial Peak									1.6 W/kg (mW/g)										l l
	Uncontrolled Exposure/General Population										averaged over 1 gram									

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

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 Table 11-4

 6 GHz WLAN Body-worn MIMO SAR Reduced for simultaneous conditions with 2.4 GHz WLAN

ERECUE								M	EASUREN	ENT RESU	JLTS									
FREQUE	FREQUENCY Mode Service Bandwidth Maximum (Ant 1)G6m) (Ant 1)G6m) (Ant 1)G6m) (Ant 2)G6m) (								Power Drift [dB]	Spacing (mm)	Antenna Config.	Device Serial Number	Data Rate (Mbps)	Side	Duty Cycle	SAR (1g)	Scaling Factor	Scaling Factor (Duty	Reported SAR (1g)	Plot #
MHz	Ch.				(Ant 1) [dBm]		(Ant 2) [dBm]		• •						1.1	(W/kg)	(Power)	Cycle)	(W/kg)	
6065.00	6065.00 23 802.11ax OFDM 80 9.5 9.25 9.5 9.30									10	MIMO	QV77001XAZ	68.1	Back	99.7	0.031	1.059	1.003	0.033	
6305.00	71	802.11ax	OFDM	80	9.5	9.29	9.5	9.40	0.00	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.025	1.050	1.003	0.026	
6545.00	119	802.11ax	OFDM	80	9.5	9.28	9.5	9.27	0.02	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.030	1.054	1.003	0.032	
6785.00	167	802.11ax	OFDM	80	9.5	9.27	9.5	9.20	0.05	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.030	1.072	1.003	0.032	
7025.00	215	802.11ax	OFDM	80	9.5	9.47	9.5	9.45	0.13	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.023	1.012	1.003	0.023	
7025.00	00 215 802.11ax OFDM 80 9.5 9.47 9.5 9.45 -0.1									10	MIMO	QV77001XAZ	0.0	Front	99.7	0.001	1.012	1.003	0.001	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolice Exposure/General Population													1.6 W	Body //kg (mW/g) ed over 1 gran					

Note: To achieve the 12.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 9.5 dBm.

Table 11-5
6 GHz WLAN Phablet MIMO SAR

								ME	ASUREM	EMENT RESULTS										
FREQU	IENCY	Mode	Service	Bandwidth [MHz]	Maximum Allowed Power	Conducted Power (Ant 1) [dBm]	Maximum Allowed Power	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Spacing (mm)	Antenna Config.	Device Serial Number	Data Rate (Mbps)	Side	Duty Cycle (%)	SAR (10g)	Scaling Factor	Scaling Factor (Duty	Reported SAR (10g)	Plot #
MHz	Ch.			[	(Ant 1) [dBm]	(,) ( <u>,</u>	(Ant 2) [dBm]	(,	11		8-		(		(74	(W/kg)	(Power)	Cycle)	(W/kg)	
6065.00	23	802.11ax	OFDM	80	11.5	11.17	11.5	11.15	-0.01	0	MIMO	QV77001XAZ	68.1	Back	99.7	0.221	1.084	1.003	0.240	
6305.00	71	802.11ax	OFDM	80	11.5	11.11	11.5	10.86	-0.05	0	MIMO	QV77001XAZ	68.1	Back	99.7	0.220	1.159	1.003	0.256	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.03	0	MIMO	QV77001XAZ	68.1	Back	99.7	0.268	1.130	1.003	0.304	A3
6785.00	167	802.11ax	OFDM	80	11.5	11.32	11.5	10.91	0.00	0	MIMO	QV77001XAZ	68.1	Back	99.7	0.233	1.146	1.003	0.268	
7025.00	215	802.11ax	OFDM	80	11.5	11.03	11.5	11.19	0.05	0	MIMO	QV77001XAZ	68.1	Back	99.7	0.179	1.114	1.003	0.200	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.20	0	MIMO	QV77001XAZ	68.1	Front	99.7	0.035	1.130	1.003	0.040	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.07	0	MIMO	QV77001XAZ	68.1	Тор	99.7	0.016	1.130	1.003	0.018	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.05	0	MIMO	QV77001XAZ	68.1	Bottom	99.7	0.002	1.130	1.003	0.002	
6545.00	00 119 802.11ax OFDM 80 11.5 10.97 11.5 11.49 0.00										MIMO	QV77001XAZ	68.1	Left	99.7	0.176	1.130	1.003	0.199	
	ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population									Phablet 4 Wikg (mW/g) averaged over 10 gram										

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

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							MEAS		ESULTS								
FREQU	JENCY		Service	Bandwidth	Maximum	Conducted Power	Maximum	Conducted Power	Power Drift			Antenna	Device Serial	Data Rate	Duty Cycle	Measured APD	
MHz	Ch.	Mode	Service	[MHz]	Allowed Power (Ant 1) [dBm]	(Ant 1) [dBm]	Allowed Power (Ant 2) [dBm]	(Ant 2) [dBm]	[dB]	Side	Test Position	Config.	Number	(Mbps)	(%)	W/m <sup>2</sup> (4cm <sup>2</sup> )	Plot #
6065.00	23	802.11ax	OFDM	80	11.5	11.17	11.5	11.15	0.15	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.807	A1
6305.00	71	802.11ax	OFDM	80	11.5	11.11	11.5	10.86	0.09	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.451	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.16	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.260	
6785.00	167	802.11ax	OFDM	80	11.5	11.32	11.5	10.91	0.19	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.129	
7025.00	215	802.11ax	OFDM	80	11.5	11.03	11.5	11.19	-0.13	Right	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.000	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.03	Right	Tilt	MIMO	QV77001XAZ	68.1	99.7	0.031	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.06	Left	Cheek	MIMO	QV77001XAZ	68.1	99.7	0.164	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.06	Left	Tilt	MIMO	QV77001XAZ	68.1	99.7	0.133	

 Table 11-6

 6 GHz WLAN Head MIMO Absorbed Power Density

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

Table 11-7
6 GHz WLAN Body-worn MIMO Absorbed Power Density

	MEASUREMENT RESULTS																
FREQU	JENCY	Mode	Service	Bandwidth	Maximum Allowed Power	Conducted Power	Maximum Allowed Power	Conducted Power		Spacing (mm)	Antenna	Device Serial	Data Rate	Side	Duty Cycle	Measured APD	Plot #
MHz	Ch.	wode	Service	[MHz]	(Ant 1) [dBm]	(Ant 1) [dBm]	(Ant 2) [dBm]	(Ant 2) [dBm]	[dB]	Spacing (mm)	Config.	Number	(Mbps)	Side	(%)	W/m <sup>2</sup> (4cm <sup>2</sup> )	PIOL#
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.16	10	MIMO	QV77001XAZ	68.1	Back	99.7	0.408	A2
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.00	10.0	MIMO	QV77001XAZ	68.1	Front	99.7	0.046	

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

Table 11-8
6 GHz WLAN Phablet MIMO Absorbed Power Density

							MEA	SUREMENT I	RESULTS								
FREQU	JENCY	Mode	Service	Bandwidth	Maximum Allowed Power	Conducted Power	Maximum Allowed Power	Conducted Power	Power Drift	Spacing (mm)	Antenna	Device Serial	Data Rate	Side	Duty Cycle	Measured APD	Plot#
MHz	Ch.	mode	Service	[MHz]	(Ant 1) [dBm]	(Ant 1) [dBm]	(Ant 2) [dBm]	(Ant 2) [dBm]	[dB]	Spacing (mm)	Config.	Number	(Mbps)	Side	(%)	W/m <sup>2</sup> (4cm <sup>2</sup> )	FIOC#
6065.00	23	802.11ax	OFDM	80	11.5	11.17	11.5	11.15	-0.01	0	MIMO	QV77001XAZ	68.1	Back	99.7	5.110	
6305.00	71	802.11ax	OFDM	80	11.5	11.11	11.5	10.86	-0.05	0	MIMO	QV77001XAZ	68.1	Back	99.7	5.110	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.03	0	MIMO	QV77001XAZ	68.1	Back	99.7	6.230	A3
6785.00	167	802.11ax	OFDM	80	11.5	11.32	11.5	10.91	0.00	0	MIMO	QV77001XAZ	68.1	Back	99.7	5.500	
7025.00	215	802.11ax	OFDM	80	11.5	11.03	11.5	11.19	0.05	0	MIMO	QV77001XAZ	68.1	Back	99.7	4.270	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.20	0	MIMO	QV77001XAZ	68.1	Front	99.7	0.829	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	-0.07	0	MIMO	QV77001XAZ	68.1	Тор	99.7	0.352	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.05	0	MIMO	QV77001XAZ	68.1	Bottom	99.7	0.057	
6545.00	119	802.11ax	OFDM	80	11.5	10.97	11.5	11.49	0.00	0	MIMO	QV77001XAZ	68.1	Left	99.7	4.250	

Note: To achieve the 14.5 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 11.5 dBm.

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SAR and Absorbed Power Density 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.
- 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.
- 6. Device was tested using a fixed spacing for body-worn accessory testing. A separation distance of 10mm was considered because the manufacturer has determined that there will be body-worn accessories available in the marketplace for users to support this separation distance.
- 7. Per FCC KDB Publication 648474 D04v01r03, body-worn SAR was evaluated without a headset connected to the device. Since the standalone reported body-worn SAR was ≤ 1.2 W/kg, no additional body-worn SAR evaluations using a headset cable were required.
- Per FCC KDB Publication 648474 D04v01r03, this device is considered a "phablet" since the diagonal dimension is > 160 mm and < 200 mm. Therefore, phablet SAR tests are required when wireless router mode does not apply or if wireless router 1g SAR > 1.2 W/kg.
- 9. Unless otherwise noted, when 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds below.
- 10. Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. Per October 2020 TCB Workshop notes, 5 channels were tested. Absorbed power density (APD) using a 4cm2 averaging area is reported based on SAR measurements.
- 11. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg for 1g SAR and less than 2.0 W/kg for 10g SAR.

#### WLAN Notes:

- WIFI 6 GHz operations are limited to MIMO operations only (does not support stand-alone mode). Per KDB Publication 248227 D01v02r02, SAR for MIMO was evaluated by following the simultaneous SAR provisions from KDB Publication 447498 D01v06 by making a SAR measurement with both antennas transmitting simultaneously.
- When the maximum reported 1g averaged SAR is ≤0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was ≤ 1.20 W/kg for 1g evaluations or all test channels were measured.
- 3. The device was 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. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated EMC test reports.

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# 11.2 Power Density Results

							0.01	TZ WLAN WIIWO POWEI DENSILY											
									MEASU	REMENT RES	BULTS								
Frequency (MHz)	Channel	Mode	Service	Bandwidth [MHz]	Power Drift (dB)	Spacing (mm)	Antenna Config.	DUT Serial Number	Data Rate (Mbps)	Side	Duty Cycle (%)	Grid Step (λ)	iPD (W/m²)	Scaling Factor for Measurement Uncertainty per IEC 62479	Normal psPD (W/m²)	Scaled Normal psPD (W/m²)	Total psPD (W/m²)	Scaled Total psPD (W/m²)	Plot #
6065.00	23	802.11ax	OFDM	80	0.20	2	MIMO	QV77005PAZ	68.1	Back	99.7	0.0625	-	1.554	0.536	0.833	0.831	1.291	
6305.00	71	802.11ax	OFDM	80	-0.20	2	MIMO	QV77005PAZ	68.1	Back	99.7	0.0625	-	1.554	0.709	1.102	0.953	1.481	
6545.00	119	802.11ax	OFDM	80	0.05	2	MIMO	QV77005PAZ	68.1	Back	99.7	0.0625		1.554	2.280	3.543	2.860	4.444	A4
6785.00	167	802.11ax	OFDM	80	0.20	2	MIMO	QV77005PAZ	68.1	Back	99.7	0.0625	-	1.554	0.629	0.977	0.909	1.413	
7025.00	215	802.11ax	OFDM	80	0.13	2	MIMO	QV77005PAZ	68.1	Back	99.7	0.0625	-	1.554	1.160	1.803	1.580	2.455	
6545.00	119	802.11ax	OFDM	80	0.15	2	MIMO	QV77001XAZ	68.1	Front	99.7	0.0625		1.554	0.560	0.870	0.673	1.046	
6545.00	119	802.11ax	OFDM	80	0.08	2	MIMO	QV77001XAZ	68.1	Тор	99.7	0.0625		1.554	0.380	0.591	0.408	0.634	
6545.00	119	802.11ax	OFDM	80	-0.14	2	МІМО	QV77001XAZ	68.1	Bottom	99.7	0.0625	-	1.554	0.126	0.196	0.173	0.269	
6545.00	119	802.11ax	OFDM	80	0.19	2	MIMO	QV77001XAZ	68.1	Left	99.7	0.0625	0.950	1.554	1.880	2.922	2.340	3.636	
6545.00	119	802.11ax	OFDM	80	0.00	9.16	MIMO	QV77001XAZ	68.1	Left	99.7	0.0625	0.332	1.554	0.218	0.339	0.249	0.387	
	47 CFR §1.1310 - SAFETY LIMIT Spatial Average Uncontrolled Exposure / General Population							Power Density 10 W/m <sup>2</sup> averaged over 4 cm <sup>2</sup>											

Table 11-9 6 GHz WLAN MIMO Power Density

#### Power Density General Notes

- 1. The manufacturer has confirmed that the devices tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
- 2. Batteries are fully charged at the beginning of the measurements. The DUT was connected to a wall charger for some measurements due to the test duration. It was confirmed that the charger plugged into this DUT did not impact the near-field PD test results.
- 3. Power density was calculated by repeated E-field measurements on two measurement planes separated by  $\lambda/4$ .
- 4. The device was 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.
- Per FCC guidance and equipment manufacturer guidance, power density results were scaled according to IEC 62479:2010 for the portion of the measurement uncertainty > 30%. Total expanded uncertainty of 2.68 dB (85.4%) was used to determine the psPD measurement scaling factor.
- 6. Per equipment manufacturer guidance, power density was measured at d=2mm and d=λ/5mm using the same grid size and grid step size for some frequencies and surfaces. The integrated Power Density (iPD) was calculated based on these measurements. Since iPD ratio between the two distances is ≥ -1dB, the grid step was sufficient for determining compliance at d=2mm.
- 7. WIFI 6 GHz operations are limited to MIMO operations only (does not support stand-alone mode). psPD for MIMO was evaluated by making a measurement with both antennas transmitting simultaneously.
- 8. PTP-PR algorithm was used during psPD measurement and calculations.

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# 12 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
-	WL25-1	Conducted Cable Set (25GHz)	12/19/2021	Annual	12/19/2022	WL25-1
Agilent	N9038A	MXE EMI Receiver	N/A	N/A	N/A	MY51210133
Rohde & Schwarz	FSW67	Signal / Spectrum Analyzer	N/A	N/A	N/A	103200
Sunol	JB5	Bi-Log Antenna (30M - 5GHz)	N/A	N/A	N/A	A051107
Emco	3115	Horn Antenna (1-18GHz)	N/A	N/A	N/A	9704-5182
Amplifier Research	15S1G6	Amplifier	СВТ	N/A	СВТ	433975
Keysight Technologies	N9030A	3Hz-44GHz PXA Signal Analyzer	7/21/2021	Annual	7/21/2022	MY49430494
SPEAG	EUmmWV3	EUmmWV3 Probe	11/11/2021	Annual	11/11/2022	9389
SPEAG	EUmmWV3	EUmmWV3 Probe	12/13/2021	Annual	12/13/2022	9407
SPEAG	SM 003 100 AA	10 GHz System Verification Antenna	8/12/2021	Annual	8/12/2022	1004
SPEAG	DAE4ip	Dasy Data Acquisition Electronics	11/11/2021	Annual	11/11/2022	1638
SPEAG	DAE4ip	Dasy Data Acquisition Electronics	1/21/2022	Annual	1/21/2023	1639
SPEAG	EX3DV4	SAR Probe	10/26/2021	Annual	10/26/2022	7551
SPEAG	DAE4	Dasy Data Acquisition Electronics	9/15/2021	Annual	9/15/2022	1449
SPEAG	D6.5GHzV2	6.5GHz SAR Dipole	12/13/2021	Annual	12/13/2022	1018
Control Company	4352	Long Stem Thermometer	5/16/2020	Biennial	5/16/2022	200294604
Control Company	4040	Therm./Clock/Humidity Monitor	3/12/2021	Biennial	3/12/2023	210202100
Agilent	SMF100A	Signal Generator	5/7/2020	Biennial	5/7/2022	101590
SPEAG	DAK-3.5	Dielectric Assessment Kit	5/12/2021	Annual	5/12/2022	1070
Mitutoyo	500-196-30	CD-6"ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Anritsu	MS2038C	20 GHz Vector Network Analyzer	2/18/2022	Annual	2/18/2023	1214109
MCL	BW-N6W5+	6dB Attenuator	СВТ	N/A	СВТ	1139
Narda	BW-S3W2	Attenuator (3dB)	СВТ	N/A	СВТ	120
MiniCircuits	VLF-6000+	Low Pass Filter	CBT	N/A	СВТ	N/A
MiniCircuits	ZUDC10-83-S+	Directional Coupler	9/15/2021	Annual	9/15/2022	2111
Seekonk	NC-100	Torque Wrench	8/5/2020	Biennial	8/5/2022	N/A
Anritsu	MA2411B	Pulse Power Sensor	8/10/2021	Annual	8/10/2022	1207364
Anritsu	MA2411B	Pulse Power Sensor	8/10/2021	Annual	8/10/2022	1339018
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1520

Note:

- 1. Each equipment item was used solely within its respective calibration period.
- 2. CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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# **13** MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements:

a	b	с	d	e=	f	8	h =	i =	k
				f(d,k)			c x f/e	cxg/e	
	IEEE	Tol.	Prob.		Ci	Ci	1gm	10gms	
Uncertainty Component	1528 Sec.	(±%)	Dist.	Div.	1gm	10 gms	ц	ui	vi
							(± %)	(± %)	
Measurement System									
Probe Calibration	E.2.1	9.3	N	1	1	1	9.3	9.3	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.4	R	1.732	1	1	0.2	0.2	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E.5	4	R	1.732	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	2.70	N	1	1	1	2.7	2.7	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.732	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.2	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	4.1	N	1	0.23	0.26	0.9	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Unceritainty	E.3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)			RSS	1	L	1	13.3	13.1	191
Expanded Uncertainty			k=2				26.5	26.1	
(95% CONFIDENCE LEVEL)			N= 2				20.5	20.1	

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Applicable for Power Density Measurements:

a	b	с	d	е	f =	g
					c x f/e	
	Unc.	Prob.			ui	
Uncertainty Component	$(\pm dB)$	Dist.	Div.	c <sub>i</sub>	(± dB)	Vi
Measurement System		<u> </u>				
Calibration	0.49	Ν	1	1	0.49	∞
Probe Correction	0.00	R	1.73	1	0.00	8
Frequency Response	0.20	R	1.73	1	0.12	∞
Sensor Cross Coupling	0.00	R	1.73	1	0.00	∞
Isotropy	0.50	R	1.73	1	0.29	8
Linearity	0.20	R	1.73	1	0.12	∞
Probe Scattering	0.00	R	1.73	1	0.00	80
Probe Positioning offset	0.30	R	1.73	1	0.17	∞
Probe Positioning Repeatability	0.04	R	1.73	1	0.02	∞
Sensor MechanicalOffset	0.00	R	1.73	1	0.00	∞
Probe Spatial Resolution	0.00	R	1.73	1	0.00	∞
Field Impedence Dependance	0.00	R	1.73	1	0.00	8
Amplitude and Phase Drift	0.00	R	1.73	1	0.00	00
Amplitude and Phase Noise	0.04	R	1.73	1	0.02	∞
Measurement Area Truncation	0.00	R	1.73	1	0.00	8
Data Acquisition	0.03	N	1	1	0.03	8
Sampling	0.00	R	1.73	1	0.00	8
Field Reconstruction	2.00	R	1.73	1	1.15	80
Forward Transformation	0.00	R	1.73	1	0.00	80
Power Density Scaling	0.00	R	1.73	1	0.00	80
Spatial Averaging	0.10	R	1.73	1	0.06	∞
System Detection Limit	0.04	R	1.73	1	0.02	8
Test Sample Related			•			
Probe Coupling with DUT	0.00	R	1.73	1	0.00	ø
Modulation Response	0.40	R	1.73	1	0.23	8
Integration Time	0.00	R	1.73	1	0.00	8
Response Time	0.00	R	1.73	1	0.00	8
Device Holder Influence	0.10	R	1.73	1	0.06	8
DUT alignment	0.00	R	1.73	1	0.00	8
RF Ambient Conditions	0.04	R	1.73	1	0.02	8
Ambient Reflections	0.04	R	1.73	1	0.02	8
Immunity/Secondary Reception	0.00	R	1.73	1	0.00	8
Drift of DUT	0.21	R	1.73	1	0.12	8
Combined Standard Uncertainty (k=1)	· · · · · · · · · · · · · · · · · · ·	RSS			1.34	8
Expanded Uncertainty		k=2			2.68	
(95% CONFIDENCE LEVEL)						

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# 15 CONCLUSION

#### 15.1 Measurement Conclusion

The SAR and power density measurements indicate that the DUT complies with the RF radiation exposure limits of the FCC, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the RF Exposure and distribution of electromagnetic energy in the body are very 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 in possible biological effects 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 various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables.

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