

### **SAR EVALUATION REPORT**

FCC 47 CFR § 2.1093 IEEE Std 1528-2013

For

802.11a/b/g/n Portable Touch Screen Device

FCC ID: R33C4TT75G Model Name: C4-TT7

Report Number: 12016468-S1V3 Issue Date: 2/5/2018

Prepared for
CONTROL4 CORP.
11724 S. ELECTION RD.
SALT LAKE CITY, UT 84020 U.S.A.

Prepared by

UL VERIFICATION SERVICES INC. 47173 BENICIA STREET FREMONT, CA 94538, U.S.A. TEL: (510) 771-1000

TEL: (510) 771-1000 FAX: (510) 661-0888



## **Revision History**

Rev.	Date	Revisions	Revised By
V1	12/8/2017	Initial Issue	
V2	12/14/2017	Section 1: Removed DTS Appendix A: Updated illustrations Appendix C: Updated test plots	Coltyce Sanders
V3	2/5/2018	Appendix A: Updated Device dimensions	Coltyce Sanders

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### 1. Attestation of Test Results

Applicant Name	CONTROL4 CORP.				
FCC ID	R33C4TT75G				
Model Name	C4-TT7				
Applicable Standards	FCC 47 CFR § 2.1093 Published RF exposure KDB procedures IEEE Std 1528-2013				
	SAR Limits (W/Kg)				
Exposure Category	Peak spatial-average(1g of tissue)		Extremities (hands, wrists, ankles, etc.) (10g of tissue)		
General population / Uncontrolled exposure	1.6 4		4		
DE Evenosura Conditiona	Equ	ipment Class - High	est Reported SAR (W/kg)		
RF Exposure Conditions	PCB	DTS	U-NII	DSS	
Standalone	N/A N/A 0.751		0.751	N/A	
Date Tested	11/27/2017 to 12/4/2017				
Test Results	Pass				

**Note:** SAR testing was performed for the enabled U-NII band 5.2GHz. See section 6.3. The SAR measurement results from the original filing can be found in FCC SAR report (FCC ID: R33C4TT7). This report only contains the SAR measurements for the added U-NII Band.

UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by UL Verification Services Inc. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

**Note:** The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government (NIST Handbook 150, Annex A). This report is written to support regulatory compliance of the applicable standards stated above.

Approved & Released By:	Prepared By:
	Fre
Dave Weaver	Remi Rodberg
Operations Leader	Laboratory Technician
UL Verification Services Inc.	UL Verification Services Inc.

## 2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure KDB procedures:

- o 248227 D01 802.11 Wi-Fi SAR v02r02
- o 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- o 616217 D04 SAR for laptop and tablets v01r02
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

### 3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

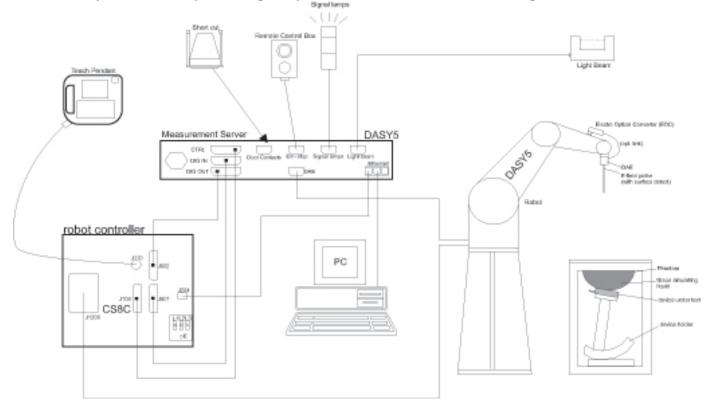
47173 Benicia Street	47266 Benicia Street
SAR Lab A	SAR Lab 1
SAR Lab B	SAR Lab 2
SAR Lab C	SAR Lab 3
SAR Lab D	SAR Lab 4
SAR Lab E	
SAR Lab F	
SAR Lab G	
SAR Lab H	

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

## 4. SAR Measurement System & Test Equipment

### 4.1. SAR Measurement System

The DASY5 system used for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

### 4.2. SAR Scan Procedures

### **Step 1: Power Reference Measurement**

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

#### Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	When the x or y dimension o measurement plane orientation the measurement resolution is x or y dimension of the test dimeasurement point on the test	on, is smaller than the above, must be ≤ the corresponding device with at least one

#### Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

			≤3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$			$\leq$ 2 GHz: $\leq$ 8 mm 2 – 3 GHz: $\leq$ 5 mm <sup>*</sup>	$3 - 4 \text{ GHz: } \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \le 4 \text{ mm}^*$
	uniform	grid: Δz <sub>Zoom</sub> (n)	≤ 5 mm	$3 - 4 \text{ GHz: } \le 4 \text{ mm}$ $4 - 5 \text{ GHz: } \le 3 \text{ mm}$ $5 - 6 \text{ GHz: } \le 2 \text{ mm}$
Maximum zoom scan spatial resolution, normal to phantom surface	$\begin{array}{c} \Delta z_{Zoom}(1)\text{: between} \\ 1^{st} \text{ two points closest} \\ \text{to phantom surface} \\ \\ \Delta z_{Zoom}(n>1)\text{:} \\ \\ \text{between subsequent} \\ \text{points} \end{array}$	1st two points closest	≤ 4 mm	$3 - 4 \text{ GHz: } \le 3 \text{ mm}$ $4 - 5 \text{ GHz: } \le 2.5 \text{ mm}$ $5 - 6 \text{ GHz: } \le 2 \text{ mm}$
		$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$		
Minimum zoom scan volume	x, y, z	x, y, z $\geq 30 \text{ mm}$ $4-5 \text{ GHz}: \geq 25 \text{ r}$		$3 - 4 \text{ GHz:} \ge 28 \text{ mm}$ $4 - 5 \text{ GHz:} \ge 25 \text{ mm}$ $5 - 6 \text{ GHz:} \ge 22 \text{ mm}$

Note:  $\delta$  is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

#### Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

### Step 5: Z-Scan (FCC only)

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation the extrapolated distance should not be larger than the step size in Z-direction.

When zoom scan is required and the <u>reported</u> SAR from the <u>area scan based 1-g SAR estimation</u> procedures of KDB 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.

### 4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	Agilent	8753ES	MY40001647	9/15/2018
Dielectric Probe kit	SPEAG	DAK-3.5	1103	2/16/2018
Shorting block	SPEAG	DAK-3.5 Short	SM DAK 200 BA	11/8/2018
Thermometer	Traceable Calibration Control Co.	4242	150378159	5/26/2018

**System Check** 

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthesized Signal Generator	Agilent	N5181A	MY50140610	5/31/2018
Power Meter	Keysight	N1912A	MY55196008	5/12/2018
Power Sensor	Agilent	N1921A	MY52260009	1/5/2018
Power Sensor	Agilent	N1921A	MY55570C22	12/17/2017
DC Power Supply	BK PRECISION	E3610A	215-02292	N/A
Amplifier	MITEQ	AMF-4D-00400600-50-30P	1795093	N/A
Directional coupler	Werlatone	C8060-102	2149	N/A

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab F)	SPEAG	EX3DV4	3773	4/21/2018
Data Acquisition Electronics (SAR Lab F)	SPEAG	DAE4	1259	1/20/2018
System Validation Dipole	SPEAG	D5GHzV2	1138	10/26/2018

#### **Other**

Name of Equipment	Manufacturer	Type/Model	T Number	Serial No.	Cal. Due Date
Power Sensor	Agilent	N1921A	T 748	MY53020038	4/13/2018
Power Meter	Agilent	N1912A	T 733	MY50001018	10/17/2019

# 5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be  $\leq$  30%, for a confidence interval of k = 2. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. Therefore, the measurement uncertainty is not required.

## 6. Device Under Test (DUT) Information

## 6.1. DUT Description

Device Dimension	Overall (Length x Width): 1: Overall Diagonal: 215 mm Display Diagonal: 180 mm	78.71 mm x 130.11 mm								
Back Cover		The rechargeable battery is not user accessible.								
Battery Options		The rechargeable battery is not user accessible.								
	S/N	IMEI	Notes							
Test sample information	000FFF81AAA3	N/A	Radiated							
	000FFF81AAA38	N/A	Conducted							
Hardware Version rk3188										
Software Version	4.4.2	·								

## 6.2. Wireless Technologies

Frequency bands	Operating mode	Duty Cycle used for SAR testing
2.4 GHz	802.11b 802.11g 802.11n (HT20)	N/A
5.2 GHz	802.11a	97% 97%
	2.4 GHz	802.11b 802.11g 802.11n (HT20) 5.2 GHz 802.11a

### 6.3. Differences between FCC ID: R33C4TT7 and FCC ID: R33C4TT75G

The DUT hardware is physically identical to FCC ID: R33C4TT7 and uses the same model number. FCC ID: R33C4TT7 supported 2.4 GHz Wi-Fi only. The difference between FCC ID: R33C4TT7 and the DUT assessed in this report is that the 5.2 GHz Wi-Fi has been enabled. This test report covers the 5.2 GHz testing only.

## 6.4. Maximum Output Power from Tune-up Procedure

RF Air interface	Mode	Max. RF Output Pow er (dBm)
	802.11b	11.5
WiFi 2.4 GHz	802.11g	13.5
	802.11n HT20	12.5
WiFi 5 GHz	802.11a	12.5
WIFI 5 GHZ	802.11n HT20	10.5

## 7. RF Exposure Conditions (Test Configurations)

Refer to Appendix A for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

### 7.1. Standalone SAR Test Exclusion Considerations

Since the *Dedicated Host Approach* is applied, the standalone SAR test exclusion procedure in KDB 447498 § 4.3.1 is applied in conjunction with KDB 616217 § 4.3 to determine the minimum test separation distance:

- o When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.
- When the separation distance from the antenna to an adjacent edge is > 5 mm, the actual antenna-to-edge separation distance is applied to determine SAR test exclusion.

### **SAR Test Exclusion Calculations for WLAN**

Antennas < 50mm to adjacent edges

Tx					Separation Distances (mm)					Calculated Threshold Value					
Interface	(MHz)	dBm	mW	Rear	Edge 1	Edge 1 Slant	Edge 2	Edge 3	Edge 4	Rear	Edge 1	Edge 1 Slant	Edge 2	Edge 3	Edge 4
Wi-Fi 5.2 GHz	5240	12.50	18	15.06	5	5	120.26	105.0	25.77	2.7 -EXEMPT-	8.2 -MEASURE-	8.2 -MEASURE-	> 50 mm	> 50 mm	1.6 -EXEMPT-

#### Note(s):

According to KDB 447498, if the calculated threshold value is >3, SAR testing is required.

Antennas > 50mm to adjacent edges

Tx	Frequency	ency Output Power Separation Distances (mm)					Calculated Threshold Value								
Interface	(MHz)	dBm	m W	Rear	Edge 1	Edge 1 Slant	Edge 2	Edge 3	Edge 4	Rear	Edge 1	Edge 1 Slant	Edge 2	Edge 3	Edge 4
Wi-Fi 5.2 GHz	5240	12.50	18	15.06	5	5	120.26	105.0	25.77	< 50 mm	< 50 mm	< 50 mm	768.1 mW -EXEMPT-	615.5 mW -EXEMPT-	< 50 mm

#### Note(s):

According to KDB 447498, if the calculated threshold value is >3, SAR testing is required.

### 7.2. Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 7.1:

Test Configurations	Rear	Edge 1 Edge 1 Slant		Edge 2	Edge 3	Edge 4
rest configurations	Real	(Top Edge)	(Top Edge)	(Right Edge)	(Bottom Edge)	(Left Edge)
Wi-Fi 5.2 GHz	No	Yes	Yes	No	No	No

### Note(s):

Yes = Testing is required.

No = Testing is not required.

## 8. Dielectric Property Measurements & System Check

### 8.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within  $18^{\circ}$ C to  $25^{\circ}$ C and within  $\pm 2^{\circ}$ C of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3-4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

The dielectric constant ( $\epsilon$ r) and conductivity ( $\sigma$ ) of typical tissue-equivalent media recipes are expected to be within  $\pm$  5% of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for  $\epsilon$ r and  $\sigma$  may be relaxed to  $\pm$  10%. This is limited to frequencies  $\leq$  3 GHz.

### **Tissue Dielectric Parameters**

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Н	lead	Boo	dy
raiget Frequency (Miriz)	$\epsilon_{\rm r}$	σ (S/m)	$\varepsilon_{\rm r}$	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

### IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

**Dielectric Property Measurements Results:** 

SAR		Band	Tissue Type	Frequency	Relat	ive Permittivi	ty (er)	Conductivity (σ)			
Lab	Date	(MHz)		(MHz)	Measured	Target	Delta (%)	Measured	Target	Delta (%)	
				5200	49.23	49.02	0.43	5.20	5.29	-1.86	
F	11/28/2017	5200	Body	5150	49.31	49.09	0.45	5.13	5.24	-2.01	
				5350	49.02	48.82	0.42	5.43	5.47	-0.81	
				5200	48.15	49.02	-1.77	5.39	5.29	1.74	
F	12/4/2017	5200	Body	5150	48.23	49.09	-1.75	5.31	5.24	1.41	
				5350	47.87	48.82	-1.94	5.59	5.47	2.27	

## 8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

### **System Performance Check Measurement Conditions:**

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center
  marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the
  phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole
  center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole. For 5 GHz band The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
   For 5 GHz band Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

#### **System Check Results**

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within 10% of the manufacturer calibrated dipole SAR target.

	SAR	Data	Tissue	Dinala Tuna	Dipole	Me	easured Resul	ts for 1g SAR		Measured Results for 10g SAR				Plot
	Lab	Date	Type	Dipole Type _Serial #	Cal. Due Data	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	No.
ſ	F	11/28/2017	Body	D5GHzV2 SN:1138 (5.2 GHz)	10/26/2018	7.270	72.70	73.40	-0.95	2.060	20.60	20.60	0.00	1,2
ſ	F	12/4/2017	Body	D5GHzV2 SN:1138 (5.2 GHz)	10/26/2018	7.820	78.20	73.40	6.54	2.220	22.20	20.60	7.77	3,4

## 9. Conducted Output Power Measurements

# 9.1. Wi-Fi 2.4 GHz (DTS Band)

Refer to the original filling, FCC SAR report R33C4TT7, for DTS conducted output power measurements.

## 9.2. Wi-Fi 5GHz (U-NII Bands)

### **Measured Results**

Band	Mode	Data Rate	Ch#	Freq.	Meas. Avg Pwr	Max Output	SAR Test
(GHz)	Mode	Data Nate	OII#	(MHz)	(dBm)	Power (dBm)	(Yes/No)
			36	5180	10.6		
	802.11a	6 Mbps	40	5200	10.6	12.5	Yes
			44	5220	10.5	12.5	
5.2			48	5240	10.5		
(U-NII 1)			36	5180	9.3		
	802.11n	6.5 Mbps	40	5200	9.4	10.5	No
	(HT20)	e.o	44	5220	9.3	10.5	INO
			48	5240	9.1		

### Note(s):

<sup>1.</sup> When transmission mode configurations have the same maximum output power on the same channel for the 802.11 a/g/n/ac modes, the channel in the lower order/sequence 802.11 mode (i.e. a, g, n then ac) is selected for testing per KDB 248227.

## 10. Measured and Reported (Scaled) SAR Results

#### SAR Test Reduction criteria are as follows:

#### KDB 447498 D01 General RF Exposure Guidance:

Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

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

#### KDB 248227 D01 SAR meas for 802.11:

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 <u>initial test position(s)</u> by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The <u>initial test position(s)</u> is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the <u>reported SAR</u> for the <u>initial test position</u> is:

- ≤ 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 <u>initial test position</u> 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 ≤ 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 <u>initial test position</u> and subsequent test positions, when the <u>reported</u> 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 <u>reported</u> SAR is ≤ 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.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII
  2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is ≤ 1.2 W/kg, SAR is not
  required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has
  the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is ≤
  1.2 W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands
  independently for SAR.

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

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## 10.1.Wi-Fi- (DTS Band)

Refer to the original filling, FCC SAR report R33C4TT7, for DTS SAR Test Results.

## 10.2. Wi-Fi (U-NII Bands)

Frequency		Dist.			Freq.	Power (dBm)		1-g SAR (W/kg)		Plot
Band	Mode	(mm)	Test Position	Ch #.	(MHz)	Tune-up limit	Meas.	Meas.	Scaled	No.
5.2 GHz	802.11a	0	Edge 1	40	5200.0	12.5	10.6	0.451	0.699	1
U-NII 1	6 Mbps	0	Edge 1 Slant	40	5200.0	12.5	10.6	0.485	0.751	2

## 11. SAR Measurement Variability

In accordance with published RF Exposure KDB 865664 D01 SAR measurement 100 MHz to 6 GHz. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

- Repeated measurement is not required when the original highest measured SAR is <0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.</li>
- 2) When the original highest measured SAR is ≥ 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first, or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

Ba	uency and Hz)	Air Interface	RF Exposure Conditions	Test Position	Repeated SAR (Yes/No)	Highest Measured SAR (W/kg)
52	200	Wi-Fi 802.11a/n/ac	Standalone	Edge 1 Slant	No	0.485

#### Note(s):

Repeated Measurement is not required since measured SAR is < 0.8 W/kg.

## 12. Simultaneous Transmission SAR Analysis

Device does not support simultaneous transmission.

## **Appendixes**

Refer to separated files for the following appendixes.

12016468-S1V3 Appendix A: SAR Setup Photos

12016468-S1V1 Appendix B: SAR System Check Plots

12016468-S1V2 Appendix C: Highest SAR Test Plots

12016468-S1V1 Appendix D: SAR Liquid Tissue Ingredients

12016468-S1V1 Appendix E: SAR Probe Calibration Certificates

12016468-S1V1 Appendix F: SAR Dipole Calibration Certificates

**END OF REPORT**