# **FCC SAR Test Report**

**APPLICANT** : TP-LINK TECHNOLOGIES CO., LTD.

**EQUIPMENT** : 300Mbps Wireless N USB Adapter

**BRAND NAME** : TP-LINK

**MODEL NAME** : TL-WN821N

**FCC ID** : TE7WN821NV5

**STANDARD** : FCC 47 CFR Part 2 (2.1093)

**ANSI/IEEE C95.1-1992** 

IEEE 1528-2013

We, SPORTON INTERNATIONAL (SHENZHEN) INC., would like to declare that the tested sample has been evaluated in accordance with the procedures and had been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL (SHENZHEN) INC., the test report shall not be reproduced except in full.

Prepared by: Mark Qu / Manager

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Approved by: Jones Tsai / Manager



Report No.: FA622604

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# **Revision History**

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REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA622604	Rev. 01	Initial issue of report	Mar. 14, 2016

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# 1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **TP-LINK TECHNOLOGIES CO.**, **LTD.**, **300Mbps Wireless N USB Adapter**, **TL-WN821N** are as follows.

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	Frequency Band		Highest SAR Summary
Equipment Class			Body (Separation 5mm)
			1g SAR (W/kg)
DTS	WLAN	2.4GHz WLAN	1.11
	Date of Testing:		2016/1/14

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.

# 2. Administration Data

Testing Laboratory		
Test Site	SPORTON INTERNATIONAL (SHENZHEN) INC.	
Test Site Location	1F & 2F,Building A, Morning Business Center, No. 4003 ShiGu Rd., Xili Town, Nanshan District, Shenzhen, Guangdong, P. R. China	
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Applicant Applicant		
Company Name	TP-LINK TECHNOLOGIES CO.,LTD.	
Address	Building 24 (floors 1,3,4,5) and 28 (floors1-4) Central Science and Technology Park,Shennan Rd, Nanshan, Shenzhen City, Guangdong Province, P.R. China	

Manufacturer		
Company Name	TP-LINK TECHNOLOGIES CO.,LTD.	
Address	Building 24 (floors 1,3,4,5) and 28 (floors1-4) Central Science and Technology Park,Shennan Rd, Nanshan, Shenzhen City, Guangdong Province, P.R. China	

# 3. Guidance Standard

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- · IEEE 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 447498 D02 SAR Procedures for Dongle Xmtr v02r01
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02

# 4. Equipment Under Test (EUT) Information

### 4.1 General Information

Product Feature & Specification		
<b>Equipment Name</b>	300Mbps Wireless N USB Adapter	
Brand Name	TP-LINK	
Model Name	TL-WN821N	
FCC ID	TE7WN821NV5	
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz	
Mode	· 802.11b/g/n HT20/HT40	
EUT Stage	Identical Prototype	

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#### Remark:

- The above EUT's information was declared by manufacturer. Please refer to the specifications or user's manual for more detailed description.
- 2. The EUT has two antennas, antenna 1 and antenna 2, when single antenna transmission, only antenna 1 worked. When simultaneous transmission, antenna 1 and antenna 2 worked together.

## 5. RF Exposure Limits

### 5.1 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.

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#### 5.2 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. The 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.

#### Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

#### Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

1. Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

# 6. Specific Absorption Rate (SAR)

#### 6.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

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#### 6.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (p). The equation description is as below:

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

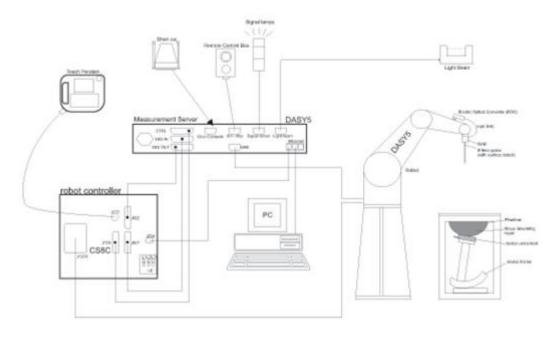
SAR is expressed in units of Watts per kilogram (W/kg)

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  is the mass density of the tissue and E is the RMS electrical field strength.

## 7. System Description and Setup

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



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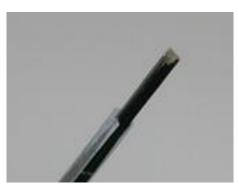
- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the 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,
- The phantom, the device holder and other accessories according to the targeted measurement.

### 7.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

#### <EX3DV4 Probe>

Construction	Symmetric design with triangular core	
	Built-in shielding against static charges	
	PEEK enclosure material (resistant to organic	
	solvents, e.g., DGBE)	
Frequency	10 MHz – >6 GHz	
	Linearity: ±0.2 dB (30 MHz – 6 GHz)	
Directivity	±0.3 dB in TSL (rotation around probe axis)	
	±0.5 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μW/g – >100 mW/g	
	Linearity: ±0.2 dB (noise: typically <1 µW/g)	
Dimensions	Overall length: 337 mm (tip: 20 mm)	
	Tip diameter: 2.5 mm (body: 12 mm)	
	Typical distance from probe tip to dipole centers: 1	
	mm	



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### 7.2 <u>Data Acquisition Electronics (DAE)</u>

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.

The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



Fig 5.1 Photo of DAE

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### 7.3 Phantom

#### <SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm;	
	Center ear point: 6 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	7 4
Measurement Areas	Left Hand, Right Hand, Flat Phantom	

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The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

#### <ELI Phantom>

2 ± 0.2 mm (sagging: <1%)	
Approx. 30 liters	
Major ellipse axis: 600 mm Minor axis: 400 mm	
	Approx. 30 liters Major ellipse axis: 600 mm

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

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#### 7.4 Device Holder

#### <Mounting Device for Hand-Held Transmitter>

In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat). And upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.





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Mounting Device for Hand-Held Transmitters

Mounting Device Adaptor for Wide-Phones

### <Mounting Device for Laptops and other Body-Worn Transmitters>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Mounting Device for Laptops

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### 8. Measurement Procedures

The measurement procedures are as follows:

#### <Conducted power measurement>

(a) For WLAN power measurement, use engineering software to configure EUT WLAN continuously transmission, at maximum RF power in each supported wireless interface and frequency band

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(b) Connect EUT RF port through RF cable to the power meter, and measure WLAN output power

#### <SAR measurement>

- (a) Engineering software to configure EUT WLAN continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

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

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

#### 8.1 Spatial Peak SAR Evaluation

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

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

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

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

#### 8.2 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. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

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#### 8.3 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 found in the scanned area, within a range of the global maximum. The range (in dB0 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 FCC KDB 865664 D01v01r04 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°
	$\leq$ 2 GHz: $\leq$ 15 mm 2 – 3 GHz: $\leq$ 12 mm	$3 - 4 \text{ GHz:} \le 12 \text{ mm}$ $4 - 6 \text{ GHz:} \le 10 \text{ mm}$
Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$	When the x or y dimension of measurement plane orientation the measurement resolution in x or y dimension of the test of measurement point on the test	on, is smaller than the above, must be ≤ the corresponding levice with at least one

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#### 8.4 Zoom Scan

Zoom scans are used assess the peak spatial SAR values within a cubic averaging volume containing 1 gram and 10 gram of simulated tissue. The zoom scan measures points (refer to table below) within a cube shoes 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 gram and 10 gram and displays these values next to the job's label.

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Zoom scan parameters extracted from FCC KDB 865664 D01v01r04 SAR measurement 100 MHz to 6 GHz.

			≤ 3 GHz	> 3 GHz		
Maximum zoom scan s	spatial reso	lution: Δx <sub>Zoom</sub> , Δy <sub>Zoom</sub>	$\leq$ 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: $\Delta z_{Zoom}(n)$	≤ 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	graded	Δz <sub>Zoom</sub> (1): between 1 <sup>st</sup> two points closest to phantom surface	ints closest $\leq 4 \text{ mm}$ $4-5 \text{ GHz}: \leq 2.5 \text{ mm}$			
	grid  AZZ bety poir		≤ 1.5·∆z	Z <sub>Zoom</sub> (n-1)		
Minimum zoom scan volume x, y, z			≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm		

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

#### 8.5 Volume Scan Procedures

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

#### 8.6 Power Drift Monitoring

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

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When zoom scan is required and the <u>reported</u> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is  $\leq 1.4 \text{ W/kg}$ ,  $\leq 8 \text{ mm}$ ,  $\leq 7 \text{ mm}$  and  $\leq 5 \text{ mm}$  zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

# 9. Test Equipment List

Marie Contract	No. of Edition of	T (88 . 1 . 1	Serial	Calib	ration	
Manufacturer	Name of Equipment	Type/Model	Number	Last Cal.	Due Date	
SPEAG	2450MHz System Validation Kit	D2450V2	926	Jul. 24, 2015	Jul. 23, 2016	
SPEAG	Data Acquisition Electronics	DAE4	1386	Feb. 19, 2015	Feb. 18, 2016	
SPEAG	Dosimetric E-Field Probe	EX3DV4	3958	Feb. 26, 2015	Feb. 25, 2016	
SPEAG	SAM Twin Phantom	QD 000 P40 CD	TP-1670	NCR	NCR	
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR	
R&S	Network Analyzer	ZVB8	100106	Oct. 20, 2015	Oct. 19, 2016	
Speag	Dielectric Assessment KIT	DAK-3.5	1071	Nov. 24, 2015	Nov. 23, 2016	
R&S	Signal Generator	SMBV100A	258305	Jan. 23, 2015	Jan. 22, 2016	
Anritsu	Power Sensor	MA2411B	1207253	Jan. 28, 2015	Jan. 27, 2016	
Anritsu	Power Meter	ML2495A	1218010	Jan. 28, 2015	Jan. 27, 2016	
Anritsu	Power Senor	MA2411B	917070	Jan. 23, 2015	Jan. 22, 2016	
Anritsu	Power Meter	ML2495A	1005002	Jan. 23, 2015	Jan. 22, 2016	
R&S	Spectrum Analyzer	FSP7	101634	Aug. 07, 2015	Aug. 06, 2016	
ARRA	Power Divider	A3200-2	N/A	No	te1	
AR	Amplifier	5S1G4	333096	No	te1	
mini-circuits	Amplifier	ZVE-3W-83+	162601250	No	te1	
Agilent	Dual Directional Coupler	778D	50422	No	te1	
PASTERNACK	Dual Directional Coupler	PE2214-10	N/A	No	te1	
MCL	Attenuation1	BW-S10W5	N/A	Note1		
Weinschel	Attenuation2	3M-20	N/A	Note1		
Zhongjilianhe	Attenuation3	MVE2214-03	N/A	No	te1	

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#### **General Note:**

Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.

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# 10. System Verification

# 10.1 Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

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Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (εr)	
For Body									
2450	68.6	0	0	0	0	31.4	1.95	52.7	

#### <Tissue Dielectric Parameter Check Results>

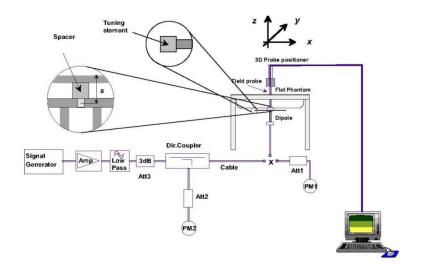
Frequency (MHz)	Tissue Type	Liquid Temp. (℃)	Conductivity (σ)	Permittivity (ε <sub>r</sub> )	Conductivity Target (σ)	Permittivity Target (ε <sub>r</sub> )	Delta (σ) (%)	Delta (ε <sub>r</sub> ) (%)	Limit (%)	Date
2450	Body	22.6	1.913	50.974	1.95	52.70	-1.90	-3.28	±5	2016/1/14

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### 10.2 System Performance Check Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)2	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2016/1/14	2450	Body	250	926	3958	1386	12.70	51.70	50.8	-1.74





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Fig 8.3.1 System Performance Check Setup

Fig 8.3.2 Setup Photo

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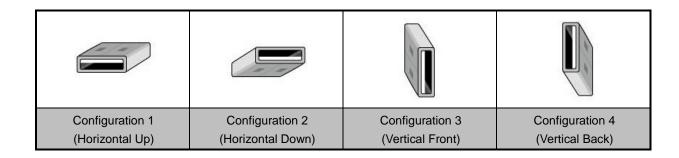
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## 11. RF Exposure Positions

### 11.1 SAR Testing for USB Dongle

This EUT was tested in five different USB configurations. They are "direct laptop plug-in for configuration 1 and 3", "USB cable plug-in for configuration 2, 4", and "USB cable plug-in for Tip Mode (the tip of the EUT)" shown as below. Both direct laptop plug-in and USB cable plug-in test configurations are tested with 5 mm separation between the particular dongle orientation and the flat phantom. Please refer to Appendix D for the test setup photos.

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# 12. Conducted RF Output Power (Unit: dBm)

#### <WLAN Conducted Power>

#### **General Note:**

1. Per KDB 248227 D01v02r02, SAR test reduction is determined according to 802.11 transmission mode configurations and certain exposure conditions with multiple test positions. In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. For OFDM, in both 2.4 and 5 GHz bands, an initial test configuration must be determined for each standalone and aggregated frequency band, according to the transmission mode configuration with the highest maximum output power specified for production units to perform SAR measurements. If the same highest maximum output power applies to different combinations of channel bandwidths, modulations and data rates, additional procedures are applied to determine which test configurations require SAR measurement. When applicable, an initial test position may be applied to reduce the number of SAR measurements required for next to the ear, UMPC mini-tablet or hotspot mode configurations with multiple test positions.

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- 2. For 2.4 GHz 802.11b DSSS, either the initial test position procedure for multiple exposure test positions or the DSSS procedure for fixed exposure position is applied; these are mutually exclusive. For 2.4 GHz and 5 GHz OFDM configurations, the initial test configuration is applied to measure SAR using either the initial test position procedure for multiple exposure test position configurations or the initial test configuration procedures for fixed exposure test conditions. Based on the reported SAR of the measured configurations and maximum output power of the transmission mode configurations that are not included in the initial test configuration, the subsequent test configuration and initial test position procedures are applied to determine if SAR measurements are required for the remaining OFDM transmission configurations. In general, the number of test channels that require SAR measurement is minimized based on maximum output power measured for the test sample(s).
- 3. For OFDM transmission configurations in the 2.4 GHz and 5 GHz bands, When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel for each frequency band.
- 4. For all positions/configurations, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.

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### <2.4GHz WLAN ANT 1>

	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Tune-Up Limit	Duty Cycle %
2.4GHz		CH 1	2412		19.33	20.50	
WLAN ANT	802.11b	CH 6	2437	1Mbps	19.64	20.50	100.00
, I		CH 11	2462		18.73	20.00	
		CH 1	2412		16.68	17.50	
	802.11g	CH 6	2437	6Mbps	16.58	17.50	100.00
		CH 11	2462		16.73	17.50	

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### <2.4GHz WLAN ANT 1+2>

	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Tune-Up Limit	Duty Cycle %
2.4GHz		CH 1	2412		18.05	19.00	
WLAN ANT	802.11n-HT20	CH 6	2437	MCS8	19.45	20.50	100.00
1+2		CH 11	2462		19.17	20.50	
		CH 3	2422		17.72	19.50	
	802.11n-HT40	CH 6	2437	MCS8	18.67	19.50	100.00
		CH 9	2452		18.99	19.50	

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### 13. SAR Test Results

#### **General Note:**

- 1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
  - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.

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- b. For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
- c. For WLAN: Reported SAR(W/kg)= Measured SAR(W/kg)\* Duty Cycle scaling factor \* Tune-up scaling factor
- 2. each exposure position, 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

#### **WLAN Note:**

- 1. Per KDB 248227 D01v02r02, for 2.4GHz 802.11g SAR testing is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.
- Per KDB 248227 D01v02r02, for 2.4GHz 802.11n(MIMO) SAR, n-HT20MHz turn-up power is higher than n-HT40MHz, so chose n-HT20MHz for SAR evaluated.
- 3. For all positions / configurations, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions / configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.
- During SAR testing the WLAN transmission was verified using a spectrum analyzer.

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# 13.1 Body SAR

# <WLAN SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WLAN2.4GHz	802.11b 1Mbps	Horizontal Up	5	Ant 1	6	2437	19.64	20.50	1.219	100	1.000	-0.09	0.828	1.009
	WLAN2.4GHz	802.11b 1Mbps	Horizontal Down	5	Ant 1	6	2437	19.64	20.50	1.219	100	1.000	-0.09	0.521	0.635
	WLAN2.4GHz	802.11b 1Mbps	Vertical Front	5	Ant 1	6	2437	19.64	20.50	1.219	100	1.000	-0.08	0.276	0.336
	WLAN2.4GHz	802.11b 1Mbps	Vertical Back	5	Ant 1	6	2437	19.64	20.50	1.219	100	1.000	-0.02	0.2	0.244
	WLAN2.4GHz	802.11b 1Mbps	Tip Mode	5	Ant 1	6	2437	19.64	20.50	1.219	100	1.000	0.12	0.131	0.160
01	WLAN2.4GHz	802.11b 1Mbps	Horizontal Up	5	Ant 1	1	2412	19.33	20.50	1.309	100	1.000	-0.09	0.844	1.105
	WLAN2.4GHz	802.11n-HT20 MCS 8	Horizontal Up	5	Ant 1+2	6	2437	19.45	20.50	1.274	100	1.000	-0.01	0.772	0.984
	WLAN2.4GHz	802.11n-HT20 MCS 8	Horizontal Down	5	Ant 1+2	6	2437	19.45	20.50	1.274	100	1.000	-0.06	0.513	0.654
	WLAN2.4GHz	802.11n-HT20 MCS 8	Vertical Front	5	Ant 1+2	6	2437	19.45	20.50	1.274	100	1.000	-0.04	0.134	0.171
	WLAN2.4GHz	802.11n-HT20 MCS 8	Vertical Back	5	Ant 1+2	6	2437	19.45	20.50	1.274	100	1.000	-0.07	0.245	0.312
	WLAN2.4GHz	802.11n-HT20 MCS 8	Tip Mode	5	Ant 1+2	6	2437	19.45	20.50	1.274	100	1.000	-0.06	0.147	0.187
02	WLAN2.4GHz	802.11n-HT20 MCS 8	Horizontal Up	5	Ant 1+2	11	2462	19.17	20.50	1.360	100	1.000	-0.01	0.737	1.002

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### 13.2 Repeated SAR Measurement

	No.	Band	Mode	Test Position	Gap (mm)	Antenna	Ch.	Fred	Power		Tune-up Scaling Factor		Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)		Reported 1g SAR (W/kg)
	1st	WLAN2.4GHz	802.11b 1Mbps	Horizontal Up	5	Ant 1	1	2412	19.33	20.50	1.309	100	1.000	-0.09	0.844	1	1.105
2	2nd	WLAN2.4GHz	802.11b 1Mbps	Horizontal Up	5	Ant 1	1	2412	19.33	20.50	1.309	100	1.000	-0.11	0.832	1.015	1.089

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#### **General Note:**

- 1. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.
- 2. Per KDB 865664 D01v01r04, if the ratio among the repeated measurement is ≤ 1.2 and the measured SAR <1.45W/kg, only one repeated measurement is required.
- 3. The ratio is the difference in percentage between original and repeated measured SAR.
- 4. All measurement SAR result is scaled-up to account for tune-up tolerance and is compliant.

Test Engineer: Luke Lu

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## 14. Uncertainty Assessment

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type An evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

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A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacture's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor <sup>(a)</sup>	1/k <sup>(b)</sup>	1/√3	1/√6	1/√2

- (a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity
- (b)  $\kappa$  is the coverage factor

#### Table 15.1. Standard Uncertainty for Assumed Distribution

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.

**Uncertainty** Standard Standard (Ci) (Ci) Value **Error Description Probability Divisor** Uncertainty Uncertainty 10g 1g (±%) (1g) (±%) (10g) (±%) **Measurement System Probe Calibration** 6.0 6.0 Ν 1 6.0 **Axial Isotropy** 4.7 R 1.732 0.7 0.7 1.9 1.9 Hemispherical Isotropy 9.6 R 1.732 0.7 0.7 3.9 3.9 **Boundary Effects** 1.0 R 1.732 0.6 1 1 0.6 4.7 R 2.7 Linearity 1.732 1 1 2.7 System Detection Limits R 1.732 1.0 1 1 0.6 0.6 Modulation Response 3.2 R 1.732 1 1 1.8 1.8 Ν 1 0.3 Readout Electronics 0.3 1 0.3 1 Response Time 0.0 R 1.732 1 1 0.0 0.0 R 1.732 1 Integration Time 2.6 1 1.5 1.5 **RF** Ambient Noise 3.0 R 1.732 1 1 1.7 1.7 1 **RF Ambient Reflections** R 1.732 1 1.7 1.7 3.0 Probe Positioner 0.4 R 1.732 1 0.2 0.2 1 **Probe Positioning** 2.9 R 1.732 1 1 1.7 1.7 1 1 Max. SAR Eval. 2.0 R 1.732 1.2 1.2 **Test Sample Related** Device Positioning 3.0 Ν 1 1 1 3.0 3.0 Device Holder 3.6 Ν 1 3.6 3.6 1.732 Power Drift R 2.9 5.0 1 2.9 1 **Power Scaling** 0.0 R 1.732 1 1 0.0 0.0 **Phantom and Setup Phantom Uncertainty** 6.1 R 1.732 1 1 3.5 3.5 R SAR correction 0.0 1.732 1 0.84 0.0 0.0 Liquid Conductivity Repeatability 0.2 Ν 0.78 0.71 0.1 0.1 R Liquid Conductivity (target) 5.0 1.732 0.78 0.71 2.3 2.0 Liquid Conductivity (mea.) 2.5 R 1.732 0.78 0.71 1.1 1.0 Temp. unc. - Conductivity 3.4 R 1.732 0.78 0.71 1.4 1.5 Liquid Permittivity Repeatability 0.15 Ν 0.23 0.26 0.0 0.0 1 Liquid Permittivity (target) 5.0 0.7 R 1.732 0.23 0.26 8.0 Liquid Permittivity (mea.) 2.5 R 1.732 0.23 0.26 0.3 0.4 Temp. unc. - Permittivity 0.83 R 1.732 0.23 0.26 0.1 0.1 Combined Std. Uncertainty 11.4% 11.4% Coverage Factor for 95 % K=2 K=2 **Expanded STD Uncertainty** 22.9% 22.7%

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Table 15.2. Uncertainty Budget for frequency range 300 MHz to 3 GHz

### 15. References

[1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"

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- [2] ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3] IEEE Std. 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v02r02, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Oct 2015.
- [6] FCC KDB 447498 D01 v06, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Oct 2015
- [7] FCC KDB 447498 D02 v02r01, "SAR Measurement Procedures for USB Dongle Transmitters", Oct 2015.
- [8] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [9] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.

# Appendix A. Plots of System Performance Check

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The plots are shown as follows.

SPORTON INTERNATIONAL (SHENZHEN) INC.

## #System Check\_Body\_2450MHz\_160114

#### **DUT: D2450V2-SN:926**

Communication System: UID 0, CW; Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: MSL\_2450\_160114 Medium parameters used: f = 2450 MHz;  $\sigma = 1.913$  S/m;  $\epsilon_r = 50.974$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Date: 2016.01.14

Ambient Temperature: 23.3  $^{\circ}$ C; Liquid Temperature: 22.6  $^{\circ}$ C

### DASY5 Configuration:

-21.70

0 dB = 19.5 W/kg

- Probe: EX3DV4 SN3958; ConvF(7.55, 7.55, 7.55); Calibrated: 2015.02.26;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1386; Calibrated: 2015.02.19
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

**Pin=250mW/Area Scan (81x81x1):** Interpolated grid: dx=12mm, dy=12mm Maximum value of SAR (interpolated) = 19.5 W/kg

Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm Reference Value = 87.47 V/m; Power Drift = -0.06 dB Peak SAR (extrapolated) = 26.0 W/kg SAR(1 g) = 12.7 W/kg; SAR(10 g) = 5.84 W/kg Maximum value of SAR (measured) = 19.4 W/kg

-4.34 -8.68 -13.02 -17.36

# Appendix B. Plots of High SAR Measurement

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The plots are shown as follows.

SPORTON INTERNATIONAL (SHENZHEN) INC.

Communication System: UID 0, WIFI (0); Frequency: 2412 MHz; Duty Cycle: 1:1

Medium: MSL\_2450\_160114 Medium parameters used: f = 2412 MHz;  $\sigma = 1.864$  S/m;  $\varepsilon_r = 51.412$ ;

Date: 2016.01.14

 $\rho = 1000 \text{ kg/m}^3$ 

Ambient Temperature: 23.3 °C; Liquid Temperature: 22.6 °C

### DASY5 Configuration:

- Probe: EX3DV4 SN3958; ConvF(7.55, 7.55, 7.55); Calibrated: 2015.02.26;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1386; Calibrated: 2015.02.19
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Ch1/Area Scan (41x71x1): Interpolated grid: dx=12mm, dy=12mm

Maximum value of SAR (interpolated) = 1.21 W/kg

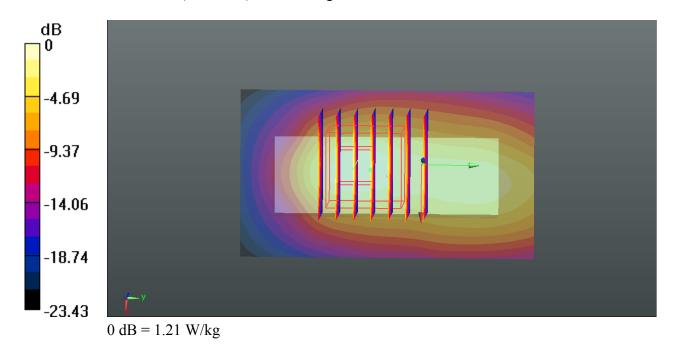
Ch1/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 3.404 V/m; Power Drift = -0.09 dB

Peak SAR (extrapolated) = 1.81 W/kg

SAR(1 g) = 0.844 W/kg; SAR(10 g) = 0.362 W/kg

Maximum value of SAR (measured) = 1.33 W/kg



Communication System: UID 0, WIFI (0); Frequency: 2462 MHz; Duty Cycle: 1:1

Medium: MSL\_2450\_160114 Medium parameters used: f = 2462 MHz;  $\sigma = 1.932$  S/m;  $\varepsilon_r = 50.908$ ;

Date: 2016.01.14

 $\rho = 1000 \text{ kg/m}^3$ 

Ambient Temperature: 23.3  $^{\circ}$ C; Liquid Temperature: 22.6  $^{\circ}$ C

### DASY5 Configuration:

- Probe: EX3DV4 SN3958; ConvF(7.55, 7.55, 7.55); Calibrated: 2015.02.26;
- Sensor-Surface: 2mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1386; Calibrated: 2015.02.19
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1670
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

### Ch11/Area Scan (41x71x1): Interpolated grid: dx=12mm, dy=12mm

Maximum value of SAR (interpolated) = 1.22 W/kg

### Ch11/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 2.890 V/m; Power Drift = -0.01 dB

Peak SAR (extrapolated) = 1.57 W/kg

SAR(1 g) = 0.737 W/kg; SAR(10 g) = 0.310 W/kg

Maximum value of SAR (measured) = 1.16 W/kg

