

FCC SAR TEST REPORT

FCC ID : TX2-RTL8822CE
Equipment : 802.11a/b/g/n/ac RTL8822CE Combo module
Brand Name : Realtek
Model Name : RTL8822CE
Applicant : Realtek Semiconductor Corp.
No. 2 Innovation Road II, Hsinchu Science
Park Hsinchu 300, Taiwan
Standard : FCC 47 CFR Part 2 (2.1093)

The product was installed into Notebook (Brand Name: Getac, Model Name: S410, S410G4, S410-4012C, S410-4212D, S410-4212E, S410G5, S410Y (Y= 10 characters, Y can be 0-9, a-z, A-Z, “-“, “_” or blank for marketing purpose and no impact safety related critical components and constructions.)) during test.

The product was received on Jul. 19, 2021 and testing was started from Sep. 24, 2024 and completed on Sep. 24, 2024. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample provide by manufacturer and the test data has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has been pass the FCC requirement.

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



Approved by: Cona Huang / Deputy Manager



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History of this test report

Report No.	Version	Description	Issued Date
FA0D1216-04	01	Initial issue of report	Nov. 11, 2024

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) for Realtek Semiconductor Corp., 802.11a/b/g/n/ac RTL8822CE Combo module, RTL8822CE, are as follows.

Equipment Class	Frequency Band		Highest SAR Summary	Highest Simultaneous Transmission 1g SAR (W/kg)
			Body (Separation 0mm)	
			1g SAR (W/kg)	
DTS	WLAN	2.4GHz WLAN	0.13	1.20
NII		5GHz WLAN	0.94	1.20
Date of Testing:			2024/9/24	

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test. This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg for Partial-Body 1g SAR, 4.0 W/kg for Product Specific 10g SAR) 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.

Reviewed by: Jason Wang
Report Producer: Carlie Tsai

2. Guidance Applied

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards, the below KDB standard may not including in the TAF code without accreditation.

- 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 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 616217 D04 SAR for laptop and tablets v01r02

3. Equipment Under Test (EUT) Information

3.1 General Information

Product Feature & Specification	
Equipment Name	802.11a/b/g/n/ac RTL8822CE Combo module
Brand Name	Realtek
Model Name	RTL8822CE
FCC ID	TX2-RTL8822CE
Wireless Technology and Frequency Range	WLAN 2.4 GHz Band: 2400 MHz ~ 2483.5 MHz WLAN 5.2 GHz Band: 5150 MHz ~ 5250 MHz WLAN 5.3 GHz Band: 5250 MHz ~ 5350 MHz WLAN 5.6 GHz Band: 5470 MHz ~ 5725 MHz WLAN 5.8 GHz Band: 5725 MHz ~ 5850 MHz
Mode	WLAN: 802.11a/b/g/n/ac HT20/HT40/VHT20/VHT40/VHT80
Remark:	
1. Variant report includes verification worst case found in original report, Sporton SAR Report, Report No. FA0D1216-02.	

Host Information	
Equipment Name	Notebook
Brand Name	Getac
Model Name	S410, S410G4, S410-4012C, S410-4212D, S410-4212E, S410G5 S410Y (Y= 10 characters, Y can be 0-9, a-z, A-Z, "-", "_" or blank for marketing purpose and no impact safety related critical components and constructions.)
Integrated WWAN module	
Brand Name	Telit
Model Name	LN920A12-WW
Wireless Technology and Frequency Range	WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 14: 788 MHz ~ 798 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 26: 814 MHz ~ 849 MHz LTE Band 30: 2305 MHz ~ 2315 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 66: 1710 MHz ~ 1780 MHz LTE Band 71: 663 MHz ~ 698 MHz
Mode	RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA LTE: QPSK, 16QAM, 64QAM
Integrated WLAN module 2	
Brand Name	Intel
Model Name	AX211NGW
Wireless Technology and Frequency Range	WLAN 2.4 GHz Band: 2400 MHz ~ 2483.5 MHz WLAN 5.2 GHz Band: 5150 MHz ~ 5250 MHz WLAN 5.3 GHz Band: 5250 MHz ~ 5350 MHz WLAN 5.6 GHz Band: 5470 MHz ~ 5725 MHz WLAN 5.8 GHz Band: 5725 MHz ~ 5850 MHz WLAN 5.9 GHz Band: 5850 MHz ~ 5895 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz
Mode	WLAN: 802.11a/b/g/n/ac/ax HT20/HT40/VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160 Bluetooth BR/EDR/LE
EUT Stage	Production Unit
Remark:	
1. This device has seven kinds of configure, the detail information and differences are following table.	
2. The WWAN Telit LN920A12-WW module integrated into the device for this model. The transmit antennas located at the top of panel which the distance of antenna to human body is over 20cm refer to page 19, SAR is not required for WWAN Antenna.	
3. The Intel AX211NGW WLAN/BT module is also integrated into this host, the WLAN/BT maximum output power and evaluation result is referenced from Intel test report, report no.: 200611-01.TR09 and 220915-01.TR01 (FCC ID: PD9AX211NG); the SAR result is used to do simultaneous transmission analysis.	

Sample List							
DVT SKUs	SKU A	SKU B	SKU C	SKU D	SKU E	SKU F	SKU G
CPU	i5	i5	i5	i5	i5	i5	i5
Display Resolution	FHD	FHD	FHD	FHD	FHD	FHD	FHD
Discrete Graphics	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support
Wifi/BT	Support (RTL8822CE) (AX201NGW)	Support (RTL8822CE) (AX201NGW)	Support (RTL8822CE) (AX201NGW)	Support (RTL8822CE) (AX201NGW)	Support (RTL8822CE) (AX201NGW)	Support (RTL8822CE) (AX211NGW)	Support (RTL8822CE) (AX211NGW)
Touch	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support
Sunlight Readable	Support	Support	Support	Support	Support	Support	Support
Main Storage	SSD 1TB	SSD 1 TB	SSD 1TB	SSD 1TB	SSD 1TB	SSD 1TB	SSD 1TB
Battery	Main	Main	Main	Main	Main	Main	Main
2nd Storage	2nd Battery	Not Support	2nd Battery	Not Support	2nd Battery	2nd Battery	2nd Battery
Webcam	Support	Support	Support	Support	Support	Support	Support
Smart Card	Support	Support	Support	Support	Support	Support	Support
Option I/O Ports	RS232 + LAN + Fischer	RS232 + LAN + Fischer	RS232 + LAN + Display	RS232 + LAN + Fischer	RS232 + LAN + Display	RS232 + LAN + Fischer	RS232 + LAN + Fischer
Discrete GPS	Not Support	Not Support	Not Support	Not Support	Not Support	Support	Not Support
Finger Print	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support
Contactless Smart Card (NFC)	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support	Not Support
LTE	Not Support	Support	Not Support	Not Support	Not Support	Support	Not Support

4. RF Exposure Limits

4.1 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.

4.2 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.

5. Specific Absorption Rate (SAR)

5.1 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.

5.2 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 (ρ). The equation description is as below:

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

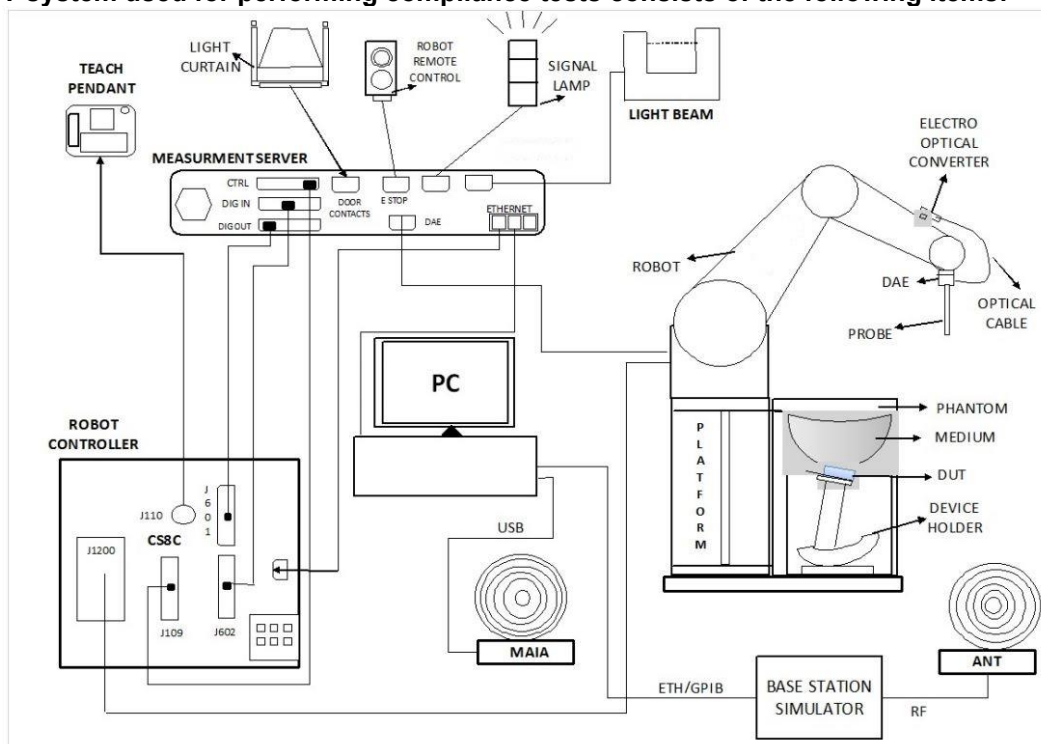
SAR is expressed in units of Watts per kilogram (W/kg)

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

6. System Description and Setup

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



- The DASY system in SAR Configuration is shown above
- 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 windows software and the DASY 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.

6.1 Test Site Location


The SAR measurement facilities used to collect data are within both Sporton Lab list below test site location are accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190 and 3786) and the FCC designation No. TW1190 and TW3786 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.

Laboratory	EMC & Wireless Communications Laboratory		Wensan Laboratory				
Test Site Location	TW1190 No.52, Huaya 1st Rd., Guishan Dist., Taoyuan City 333, Taiwan		TW3786 No.58, Aly. 75, Ln. 564, Wenhua 3rd, Rd., Guishan Dist., Taoyuan City 333010, Taiwan				
Test Site No.	SAR01-HY	SAR03-HY	SAR08-HY	SAR09-HY	SAR15-HY	SAR18-HY	SAR21-HY
	SAR04-HY	SAR05-HY	SAR11-HY	SAR12-HY	SAR16-HY	SAR19-HY	SAR22-HY
	SAR06-HY	SAR10-HY	SAR13-HY	SAR14-HY	SAR17-HY	SAR20-HY	


6.2 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.

<ES3DV3 Probe>

Construction	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	4 MHz – 4 GHz; Linearity: ± 0.2 dB (30 MHz – 4 GHz)	
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	5 μ W/g – >100 mW/g; Linearity: ± 0.2 dB	
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 3.9 mm (body: 12 mm) Distance from probe tip to dipole centers: 3.0 mm	

<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	4 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 μ W/g – >100 mW/g Linearity: ± 0.2 dB (noise: typically <1 μ W/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	

6.3 Data Acquisition Electronics (DAE)

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.

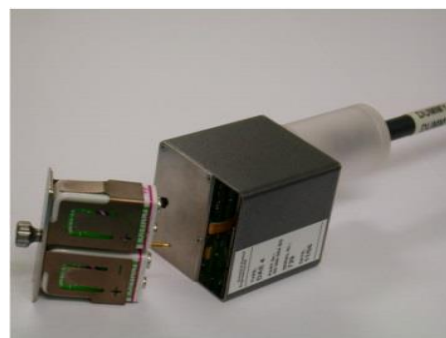



Fig 5.1 Photo of DAE


6.4 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	
Measurement Areas	Left Hand, Right Hand, Flat Phantom	

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>

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

6.5 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.



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

7. Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT 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

7.1 Spatial Peak SAR Evaluation

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 from 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

7.2 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.

7.3 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 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 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	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

7.4 Zoom Scan

Zoom scans are used to 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 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 gram and 10 gram and displays these values next to the job's label.

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

			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$	
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: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> 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.				

7.5 Volume Scan Procedures

The volume scan is used to 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 remains in the same test position for all measurements and all volume scans use the same spatial resolution and grid spacing. When all volume scans were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

7.6 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.

8. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit ⁽²⁾	D2450V2	806	Mar. 24, 2022	Mar. 21, 2025
SPEAG	5GHz System Validation Kit	D5GHzV2	1171	Apr. 19, 2024	Apr. 18, 2025
SPEAG	Data Acquisition Electronics	DAE4	854	Aug. 14, 2024	Aug. 13, 2025
SPEAG	Dosimetric E-Field Probe	EX3DV4	7439	Aug. 21, 2024	Aug. 20, 2025
Testo	Hygro meter	608-H1	45196600	Nov. 02, 2023	Nov. 01, 2024
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Sep. 27, 2023	Sep. 26, 2024
Keysight	ENA Network Analyzer	E5071C	MY46104758	Oct. 30, 2023	Oct. 29, 2024
SPEAG	Dielectric Probe Kit	DAK-3.5	1146	Jul. 15, 2024	Jul. 14, 2025
LINE SEIKI	Digital Thermometer	DTM3000-spezial	3690	Aug. 07, 2024	Aug. 06, 2025
Anritsu	Power Meter	ML2495A	1419002	Aug. 13, 2024	Aug. 12, 2025
Anritsu	Power Sensor	MA2411B	1911176	Aug. 13, 2024	Aug. 12, 2025
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jul. 09, 2024	Jul. 08, 2025
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 16, 2023	Oct. 15, 2024
ATM	Dual Directional Coupler	C122H-10	P610410z-02	Note 1	
Warison	Directional Coupler	WCOU-10-50S-10	WR889BMC4B1	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005- 3	N/A	Note 1	

General Note:

1. 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.
2. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

9. System Verification

9.1 Tissue Verification

The tissue dielectric parameters of tissue-equivalent media used for SAR measurements must be characterized within a temperature range of 18°C to 25°C, measured with calibrated instruments and apparatuses, such as network analyzers and temperature probes. The temperature of the tissue-equivalent medium during SAR measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ of the temperature when the tissue parameters are characterized. The tissue dielectric measurement system must be calibrated before use. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements.

The liquid tissue depth was at least 15cm in the phantom for all SAR testing

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Liquid Temp. (°C)	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Date
2450	22.4	1.790	38.500	1.80	39.20	-0.56	-1.79	± 5	2024/9/24
5800	22.4	5.140	35.400	5.27	35.30	-2.47	0.28	± 5	2024/9/24

9.2 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.

Test Site	Date	Frequency (MHz)	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 (%)
SAR-01	2024/9/24	2450	50	D2450V2-806	EX3DV4 - SN7439	DAE4 Sn854	2.810	52.700	56.2	6.64
SAR-01	2024/9/24	5800	50	D5GHzV2-1171	EX3DV4 - SN7439	DAE4 Sn854	4.160	78.900	83.2	5.45

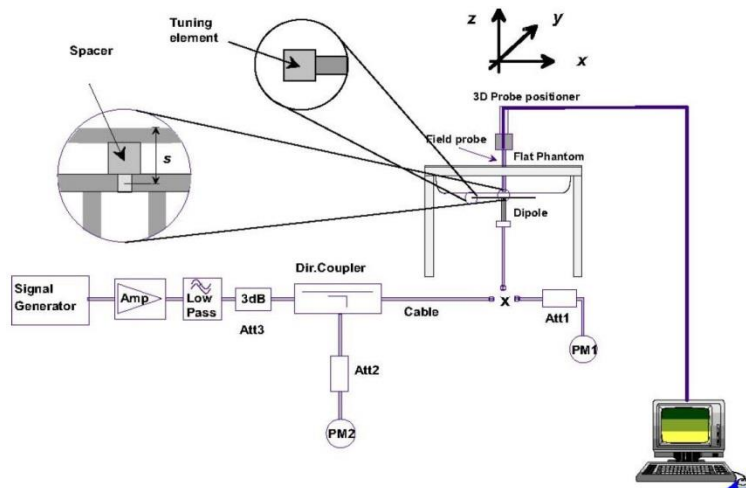


Fig 8.3.1 System Performance Check Setup



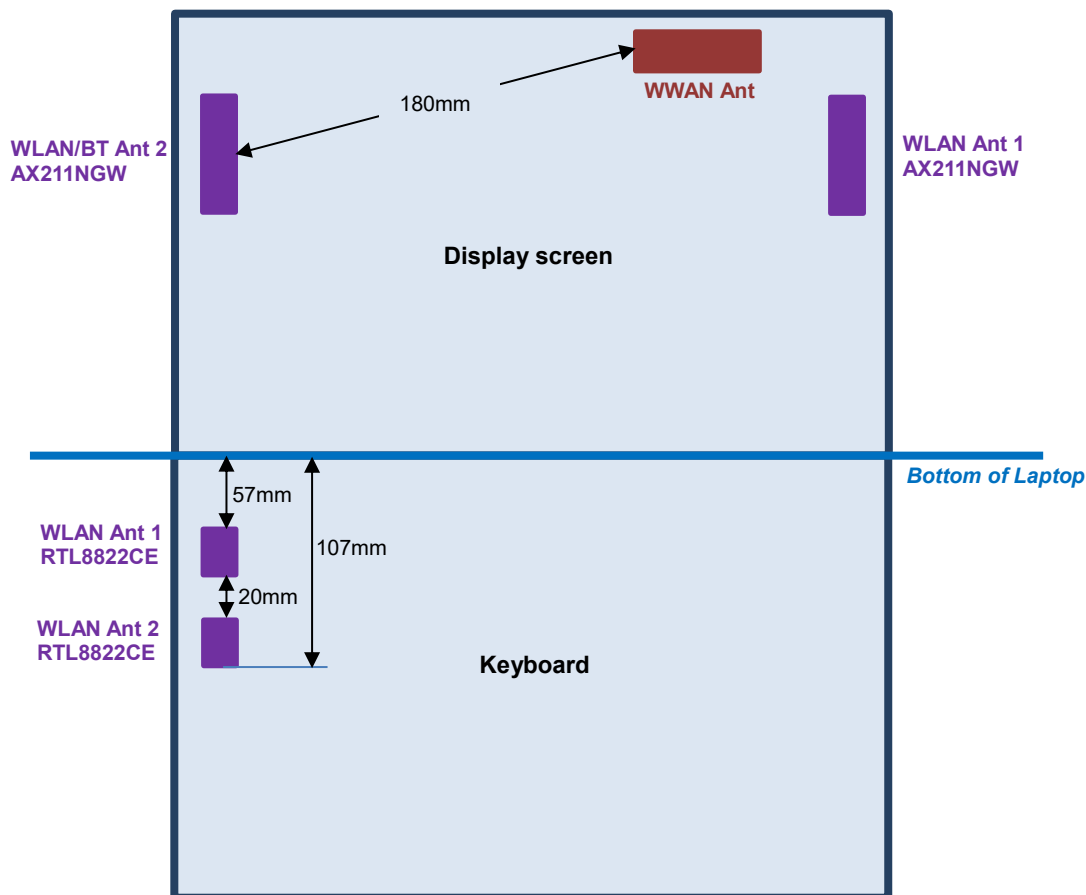
Fig 8.3.2 Setup Photo

10. WiFi Output Power (Unit: dBm)

				Ant 2			Ant 1+2 (1)		Ant 1+2 (2)		Ant 1+2		
	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %	Average power (dBm)	Tune-Up Limit	Average power (dBm)	Tune-Up Limit	Average power (dBm)	Tune-Up Limit	Duty Cycle %
2.4GHz WLAN	802.11b 1Mbps	1	2412			100.00						23.00	100.00
		6	2437	21.20	21.50		20.60	21.50	20.52	21.50	23.57	24.50	
		11	2462									22.50	
		12	2467									18.00	
		13	2472									16.50	

				Ant 1			Ant 1+2 (1)		Ant 1+2 (2)		Ant 1+2		
	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %	Average power (dBm)	Tune-Up Limit	Average power (dBm)	Tune-Up Limit	Average power (dBm)	Tune-Up Limit	Duty Cycle %
5.8GHz WLAN	802.11a 6Mbps	149	5745	21.50	22.00	100.00	21.36	22.00	21.10	22.00	24.24	25.00	100.00
		157	5785					22.00		22.00		25.00	
		165	5825					22.00		22.00		25.00	

11. Antenna Location



The separation distance for antenna to edge :

Antenna	To Bottom of Laptop (mm)
AX201NGW WLAN Antenna 1	162
AX201NGW WLAN/BT Antenna 2	162
RTL8822CE WLAN Antenna 1	<5
RTL8822CE WLAN Antenna 2	<5

<SAR test exclusion table>
General Note:

1. The below table, when the distance is < 50 mm exclusion threshold is "Ratio", when the distance is > 50 mm exclusion threshold is "mW"
2. Maximum power is the source-based time-average power and represents the maximum RF output power among production units
3. Per KDB 447498 D01v06, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
4. Per KDB 447498 D01v06, standalone SAR test exclusion threshold is applied; If the test separation distance is < 5mm, 5mm is used to determine SAR exclusion threshold.
5. Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at *test separation distances* ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR}$$
 - f(GHz) is the RF channel transmit frequency in GHz
 - Power and distance are rounded to the nearest mW and mm before calculation
 - The result is rounded to one decimal place for comparison
6. Per KDB 447498 D01v06, at 100 MHz to 6 GHz and for *test separation distances* > 50 mm, the SAR test exclusion threshold is determined according to the following
 - a) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · (f(MHz)/150)] mW, at 100 MHz to 1500 MHz
 - b) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

Exposure Position	Wireless Interface	WCDMA Band V	WCDMA Band IV	WCDMA Band II	LTE Band 71	LTE Band 12	LTE Band 13	LTE Band 14	LTE Band 17	LTE Band 5	LTE Band 26	LTE Band 4	LTE Band 66	LTE Band 2	LTE Band 25	LTE Band 30	LTE Band 7	LTE Band 38	LTE Band 41	LTE Band 48
	Calculated Frequency (MHz)	846	1750	1907	695	715	784	795	713	848	848	1754	1779	1909	1914	2312	2567	2617	2687	3697
	Maximum power (dBm)	24.5	24.5	24.5	23.5	23.5	23.5	23.5	23.5	23.5	23.5	23.5	23.5	23.5	23.5	23.0	23.5	23.5	26.5	22.0
	Maximum rated power(mW)	281.84	281.84	281.84	223.87	223.87	223.87	223.87	223.87	223.87	223.87	223.87	223.87	223.87	223.87	199.53	223.87	223.87	446.68	158.49
Bottom of Laptop	Separation distance(mm)	235.0																		
	exclusion threshold	1206.0	1963.0	1959.0	1037.0	1059.0	1136.0	1149.0	1057.0	1209.0	1209.0	1963.0	1962.0	1959.0	1958.0	1949.0	1944.0	1943.0	1942.0	1928.0
	Testing required?	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No

12. 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.
 - 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

12.1 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	Bottom Side	0mm	Ant 2	6	2437	21.20	21.50	1.072	100	1.000	0.01	0.110	0.118
01	WLAN2.4GHz	802.11b 1Mbps	Bottom Side	0mm	Ant 1+2	6	2437	23.57	24.50	1.239	100	1.000	-0.02	0.105	0.130
02	WLAN5GHz	802.11a 6Mbps	Bottom Side	0mm	Ant 1	149	5745	21.50	22.00	1.122	100	1.000	0.04	0.792	0.889
	WLAN5GHz	802.11a 6Mbps	Bottom Side	0mm	Ant 1+2	149	5745	24.24	25.00	1.191	100	1.000	0.02	0.632	0.753

13. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Body
1.	WWAN + AX211NGW + RTL8822CE	Yes

General Note:

1. For WWAN Ant transmit antenna to bottom of laptop is higher than 200mm, when the separation distance is > 50mm, an estimated 1g SAR 0.4W/kg for each transmit antenna is using for Sim-Tx analysis.
2. The Intel AX211NGW WLAN/BT module is also integrated into this host, the WLAN/BT maximum output power and evaluation result is referenced from Intel test report, report no.: 200611-01.TR09 and 220915-01.TR01 (FCC ID: PD9AX211NG).
3. The worst case WLAN reported SAR for each configuration was used for SAR summation. Therefore, the following summations represent the absolute worst cases for simultaneous transmission with WLAN.
4. The Scaled SAR summation is calculated based on the same configuration and test position.
5. Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
 - i) Scalar SAR summation < 1.6W/kg.
 - ii) SPLSR = (SAR1 + SAR2)^{1.5} / (min. separation distance, mm), and the peak separation distance is determined from the square root of [(x1-x2)² + (y1-y2)² + (z1-z2)²], where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.
 - iii) If SPLSR ≤ 0.04, simultaneously transmission SAR measurement is not necessary.
 - iv) Simultaneously transmission SAR measurement, and the reported multi-band SAR < 1.6W/kg.
 - v) The SPLSR calculated results please refer to section 13.2.

13.1 Body Exposure Conditions

Exposure Position	LN920A12-WW	AX211NGW							RTL8822CE													
	0	1	2	3	4	5	6	7	8	9	10	11	12	13								
	Maximum WWAN	2.4GHz WLAN Ant 1	2.4GHz WLAN Ant 2	2.4GHz WLAN Ant 1+2	5GHz WLAN Ant 1	5GHz WLAN Ant 2	5GHz WLAN Ant 1+2	Bluetooth Ant 2	2.4GHz WLAN Ant 1	2.4GHz WLAN Ant 2	2.4GHz WLAN Ant 1+2	5GHz WLAN Ant 1	5GHz WLAN Ant 2	5GHz WLAN Ant 1+2	0+3+10 Summed 1g SAR (W/kg)	0+3+13 Summed 1g SAR (W/kg)	0+1+7+10 Summed 1g SAR (W/kg)	0+1+7+13 Summed 1g SAR (W/kg)	0+6+7+10 Summed 1g SAR (W/kg)	0+6+7+13 Summed 1g SAR (W/kg)	SPLSR	Case No
Bottom of Laptop at 0mm	0.400	0.440	0.400	0.440	0.650	0.680	0.680	0.160	0.260	0.363	0.130	0.905	0.686	0.753	0.970	1.593	1.130	1.753	1.370	1.993	0.020	Case.1

13.2 SPLSR Evaluation and Analysis

General Note:

1. According to antenna location the minimum distance between each transmit antenna is using for SPLSR analysis.
2. Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneously transmitting antenna. When the sum of 1-g or 10-g SAR of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit, SAR test exclusion applies to that simultaneous transmission configuration. Therefore, the adjacent transmit antennas will be summed first, and then the SPLSR calculation will be evaluated with the farther transmitted antennas.
3. $SPLSR = (SAR_1 + SAR_2)^{1.5} / (min. \text{ separation distance, mm})$. If $SPLSR \leq 0.04$, simultaneously transmission SAR measurement is not necessary

Case 1	Band	Position	SAR (W/kg)	Gap (mm)	Minimum distance (mm)	Summed SAR (W/kg)	SPLSR Results	Simultaneous SAR
	WWAN Antenna + Intel WLAN2.4G Ant 1	Bottom Side	0.84	0mm	180.0	1.99	0.02	Not required
	Intel WLAN2.4G Ant 2 + RTL8822CE 5GMIMO		1.153	0mm				
Case 2	Band	Position	SAR (W/kg)	Gap (mm)	Minimum distance (mm)	Summed SAR (W/kg)	SPLSR Results	Simultaneous SAR
	WWAN Antenna + Intel WLAN2.4G Ant 1	Bottom Side	0.84	0mm	180.0	1.75	0.01	Not required
	Intel BT Ant 2 + RTL8822CE 5GMIMO		0.913	0mm				
Case 3	Band	Position	SAR (W/kg)	Gap (mm)	Minimum distance (mm)	Summed SAR (W/kg)	SPLSR Results	Simultaneous SAR
	WWAN Antenna + Intel WLAN5G Ant 1	Bottom Side	1.05	0mm	180.0	2.64	0.02	Not required
	Intel BT Ant 2 + Intel WLAN5G Ant 2+ RTL8822CE 5GMIMO		1.593	0mm				

Test Engineer : Carter Jhuang and Putzie Chen

14. Uncertainty Assessment

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, 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. For this device, the highest measured 1-g SAR is less 1.5W/kg. Therefore, the measurement uncertainty table is not required in this report.

Declaration of Conformity:

The test results with all measurement uncertainty excluded is presented in accordance with the regulation limits or requirements declared by manufacturers.

Comments and Explanations:

The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.

15. References

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [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 616217 D04 v01r02, "SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers", 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.