

FCC SAR TEST REPORT

FCC ID : UZ7-RTL10C1
Equipment : Rugged Tablet
Brand Name : Zebra
Model Name : RTL10C1
Applicant : Zebra Technologies Corporation
1 Zebra Plaza, Holtsville, NY 11742
Manufacturer : Zebra Technologies Corporation
1 Zebra Plaza, Holtsville, NY 11742
Standard : FCC 47 CFR Part 2 (2.1093)

The product was received on Jan. 04, 2022 and testing was started from Aug. 21, 2022 and completed on Aug. 21, 2022. 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
FA181117-06	01	Initial issue of report	Sep. 01, 2022



1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) for Zebra Technologies Corporation, Rugged Tablet, RTL10C1, are as follows.

Equipment Class	Frequency Band		Highest SAR Summary	Highest Simultaneous Transmission 1g SAR (W/kg)	
			Body 1g SAR (W/kg)		
Licensed	WCDMA	WCDMA II	0.99	1.54	
		WCDMA IV	0.94		
		WCDMA V	1.18		
	LTE	LTE Band 7	1.00		
		LTE Band 12	0.99		
		LTE Band 13	1.06		
		LTE Band 14	1.12		
		LTE Band 2 / 25	0.93		
		LTE Band 5 / 26	1.11		
		LTE Band 30	1.00		
		LTE Band 4 / 66	0.98		
		LTE Band 71	0.99		
		LTE Band 38 / 41	1.00		
		LTE Band 48	0.64		
		FR1	FR1 n5		1.09
			FR1 n7		0.93
	FR1 n12		1.18		
	FR1 n2 / n25		0.99		
	FR1 n66		0.98		
	FR1 n71		1.03		
FR1 n41	1.18				
FR1 n77	1.08				
DTS	WLAN	2.4GHz WLAN	0.37	1.54	
NII		5GHz WLAN	0.58	1.50	
6XD		6GHz WLAN	0.27	1.50	
DSS	2.4GHz Band	Bluetooth	0.07	1.50	
Equipment Class	Frequency Band		APD	Reported PD	
			Body 4cm ² (W/m ²)	Body 4cm ² (W/m ²)	
6XD	WLAN	6GHz WLAN	2.12	3.71	
Date of Testing:			2022/8/21		

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) specified in FCC 47 CFR part 2 (2.1093), Human Exposure to RF Radiation Limits (1.0 mW/cm²=10 W/m²) specified in FCC 47 CFR part 1.1310 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. Equipment Under Test (EUT) Information

2.1 General Information

Product Feature & Specification	
Equipment Name	Rugged Tablet
Brand Name	Zebra
Model Name	RTL10C1
FCC ID	UZ7-RTL10C1
S / N	218267490026 219457740018
Integrated WWAN Module	Brand Name: Quectel Model Name: RM505Q-AE
Integrated WLAN Module	Brand Name: Intel Model Name: AX210NGW
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 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 5G NR n2 : 1850 MHz ~ 1910 MHz 5G NR n5 : 824 MHz ~ 849 MHz 5G NR n7 : 2500 MHz ~ 2570 MHz 5G NR n12 : 699 MHz ~ 716 MHz 5G NR n25 : 1850 MHz ~ 1915 MHz 5G NR n41 : 2496 MHz ~ 2690 MHz 5G NR n66 : 1710 MHz ~ 1780 MHz 5G NR n71 : 663 MHz ~ 698 MHz 5G NR n77: 3700 MHz ~ 3980 MHz 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 6E: 5925 MHz ~ 6425 MHz, 6425 MHz ~ 6525 MHz, 6525 MHz ~ 6875 MHz, 6875 MHz ~ 7125 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz NFC : 13.56 MHz
Mode	RMC 12.2Kbps HSDPA HSUPA DC-HSDPA LTE: QPSK, 16QAM, 64QAM, 256QAM 5G NR: DFT-s-OFDM/CP-OFDM, Pi/2 BPSK/QPSK/16QAM/64QAM/256QAM WLAN: 802.11a/b/g/n/ac/ax HT20/HT40/VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160 Bluetooth BR/EDR/LE NFC: ASK
HW Version	DV2
SW Version	Windows 11 Pro
FW Version	LRA04
MFD	07JAN22
EUT Stage	Identical Prototype
Remark:	1. Based on the original filing Sporton SAR report No.: FA181117 to additional WLAN 6GHz RF exposure to do Sim-Tx analysis with WWAN transmitter, the other RF Exposure result also refer to original report.



Accessories Information				
Adaptor with CLA cable	Brand Name	Zebra	Model Number	ADP-65JH HB
Battery	Brand Name	ZEBRA	Model Number	XLBM1
Power cord	Brand Name	Zebra	Model Number	450040

Support unit				
Keyboard	Brand Name	Zebra	Model Number	L10-KB
98 Whr Extended Battery (Certified)	Brand Name	Zebra	Model Number	XLBE1
AEI LONG RANGE RFID MODULE	Brand Name	Zebra	Model Number	M6E-MICRO
PASSIVE SHORT STYLUS	Brand Name	Zebra	Model Number	440007
ET8X MPP 2.0 ACTIVE STYLUS WITH 5 REPLACEMENT TIPS. AAAA BATTERY INCLUDED	Brand Name	Zebra	Model Number	SG-ET8X-STYLUS1-01

3. 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
- IEC/IEEE 62209-1528:2020
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedure for Device Operation at 6GHz-10GHz)

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.



4.3 RF Exposure limit for above 6GHz

According to ANSI/IEEE C95.1-1992, the criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio frequency (RF) radiation as specified in §1.1310.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled Exposures				
0.3-3.0	614	1.63	*(100)	6
3.0-30	1842/f	4.89/f	*(900/f ²)	6
30-300	61.4	0.163	1.0	6
300-1500			f/300	6
1500-100,000			5	6
(B) Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	30
1.34-30	824/f	2.19/f	*(180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500			f/1500	30
1500-100,000			1.0	30

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:

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

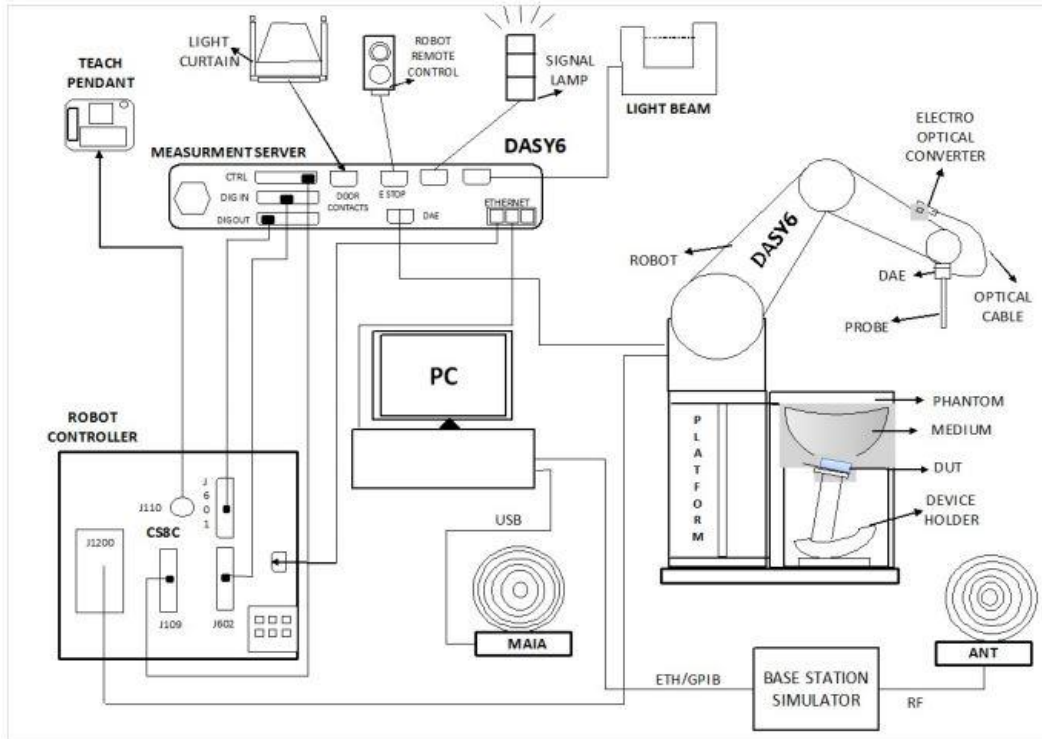
SAR is expressed in units of Watts per kilogram (W/kg)

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

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.

Test Site	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
	SAR04-HY	SAR05-HY	SAR11-HY	SAR12-HY	
	SAR06-HY	SAR10-HY	SAR13-HY	SAR14-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	10 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	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 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

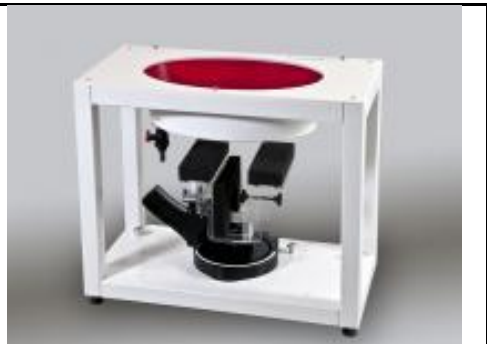
6.4 Phantom

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

7.4 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.

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: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 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: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	$\Delta z_{Zoom}(1)$: between 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
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
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 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.

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	6500MHz System Validation Kit	D6.5GHzV2	1003	Sep. 24, 2021	Sep. 23, 2022
SPEAG	Data Acquisition Electronics	DAE4	778	May. 30, 2022	May. 29, 2023
SPEAG	Dosimetric E-Field Probe	EX3DV4	3925	Apr. 29, 2022	Apr. 28, 2023
SPEAG	5G Verification Source	10GHz	1020	Jan. 18, 2022	Jan. 17, 2023
SPEAG	EUmmWV Probe Tip Protection	EUmmWV4	9441	Nov. 24, 2021	Nov. 23, 2022
RCPTWN	Thermometer	HTC-1	TM560-2	Mar. 15, 2022	Mar. 14, 2023
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Oct. 24, 2021	Oct. 23, 2022
Keysight	ENA Network Analyzer	E5071C	MY46104758	Sep. 19, 2021	Sep. 18, 2022
SPEAG	Dielectric Probe Kit	DAK-3.5	1126	Sep. 24, 2021	Sep. 23, 2022
LINE SEIKI	Digital Thermometer	DTM3000-spezial	2942	Oct. 26, 2021	Oct. 25, 2022
Anritsu	Power Meter	ML2495A	1804003	Oct. 09, 2021	Oct. 08, 2022
Anritsu	Power Meter	ML2496A	2119003	Jun. 22, 2022	Jun. 21, 2023
Anritsu	Power Sensor	MA2411B	1726150	Oct. 09, 2021	Oct. 08, 2022
Anritsu	Power Sensor	MA2411B	1911334	Jun. 22, 2022	Jun. 21, 2023
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jul. 21, 2022	Jul. 20, 2023
Anritsu	Spectrum Analyzer	N9010A	MY53470118	Jan. 12, 2022	Jan. 11, 2023
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 12, 2021	Oct. 11, 2022
Mini-Circuits	Power Amplifier	ZVE-8G+	479102029	Sep. 06, 2021	Sep. 05, 2022
ATM	Dual Directional Coupler	C122H-10	P610410z-02	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 ± 2°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
6500	22.5	6.180	35.300	6.07	34.50	1.81	2.32	±5	2022/8/21

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 (%)
SAR06	2022/8/21	6500	100	D6.5GHzV2-1003	EX3DV4 - SN3925	DAE4 Sn778	30.100	292.000	301	3.08

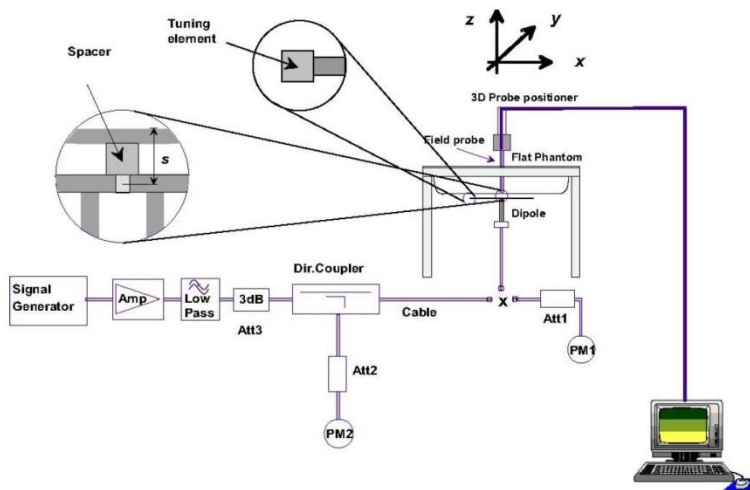


Fig 8.3.1 System Performance Check Setup



Fig 8.3.2 Setup Photo

9.3 PD System Performance Check Results

The system was verified to be within ± 0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user’s manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG’s mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check. The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

Test Location	Frequency (GHz)	5G Verification Source	Probe S/N	DAE S/N	Distance (mm)	Measured 4 cm ² (W/m ²)	Targeted 4 cm ² (W/m ²)	Deviation (dB)	Date
SAR06	10G	10GHz_1020	9441	778	10	55.7	51.7	0.32	2022/8/21

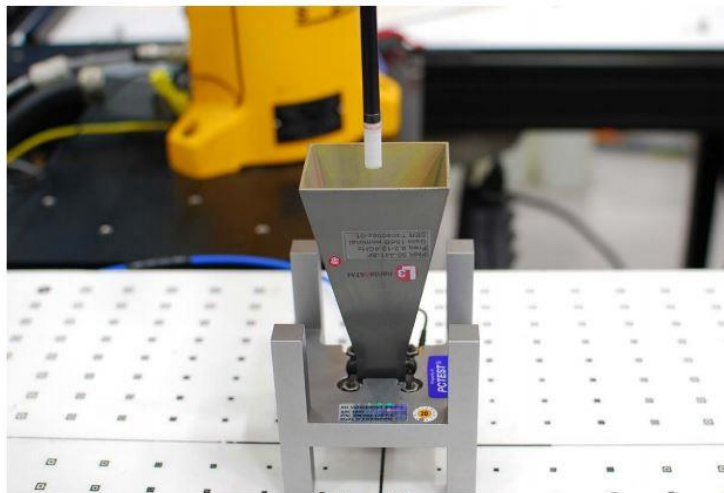


Figure 4-3
System Verification Setup Photo

System Performance Check Setup

10. RF Exposure Positions

10.1 SAR Testing for Tablet

This device can be used also in full sized tablet exposure conditions, due to its size. Per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. The SAR exclusion threshold in KDB 447498 D01v06 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.



11. WiFi/Bluetooth Output Power (Unit: dBm)

General Note:

1. For each antenna, transmit power in SISO operation is larger than (or equal to) the power in MIMO operation, RF exposure compliance of MIMO mode can be deduced from the compliance simultaneous transmission of antennas operating in SISO mode.
2. Per KDB 248227 D01v02r02, the simultaneous SAR provisions in KDB publication 447498 should be applied to determine simultaneous transmission SAR test exclusion for WiFi MIMO. If the sum of 1g single transmission chain SAR measurements is < 1.6W/kg and SAR peak to location ratio ≤ 0.04 , no additional SAR measurements for MIMO.
3. The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures. For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) 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 in the initial test configuration, additional output power measurements were not necessary.
4. 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.
5. 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).
6. 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.
7. DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures. 18 The initial test position procedure is described in the following:
 - a. When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band.
 - b. When the reported SAR of the test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is ≤ 0.8 W/kg or all required test position are tested.
 - c. 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.
8. Per 201904 TCBC workshops, General principles of FCC KDB Publication 248227 D01 can be applied to determine the SAR Initial Test Configurations and test reduction for 802.11ax SAR testing. For the table below the 802.11ax maximum power is SU (non-OFDMA), and the SU maximum power also higher than RU (OFDMA)
9. In applying the test guidance, the IEEE 802.11 mode with the maximum output power (out of all modes) should be considered for testing
10. For modes with the same maximum output power, the guidance from section 5.3.2 a) of FCC KDB Publication 248227 D01 should be applied, with 802.11ax being considered as the highest 802.11 mode for the appropriate frequency bands
11. When SAR testing for 802.11ax is required
 - a. If the maximum output power is highest for OFDMA scenarios, choose the tone size with the maximum number of tones and the highest maximum output power
 - b. Otherwise, consider the fully allocated channel for SAR testing
 - c. When SAR testing is required on RU sizes less than the fully allocated channel, use the RU number closest to the middle of the channel, choosing the higher RU number when two RUs are equidistant to the middle of the channel

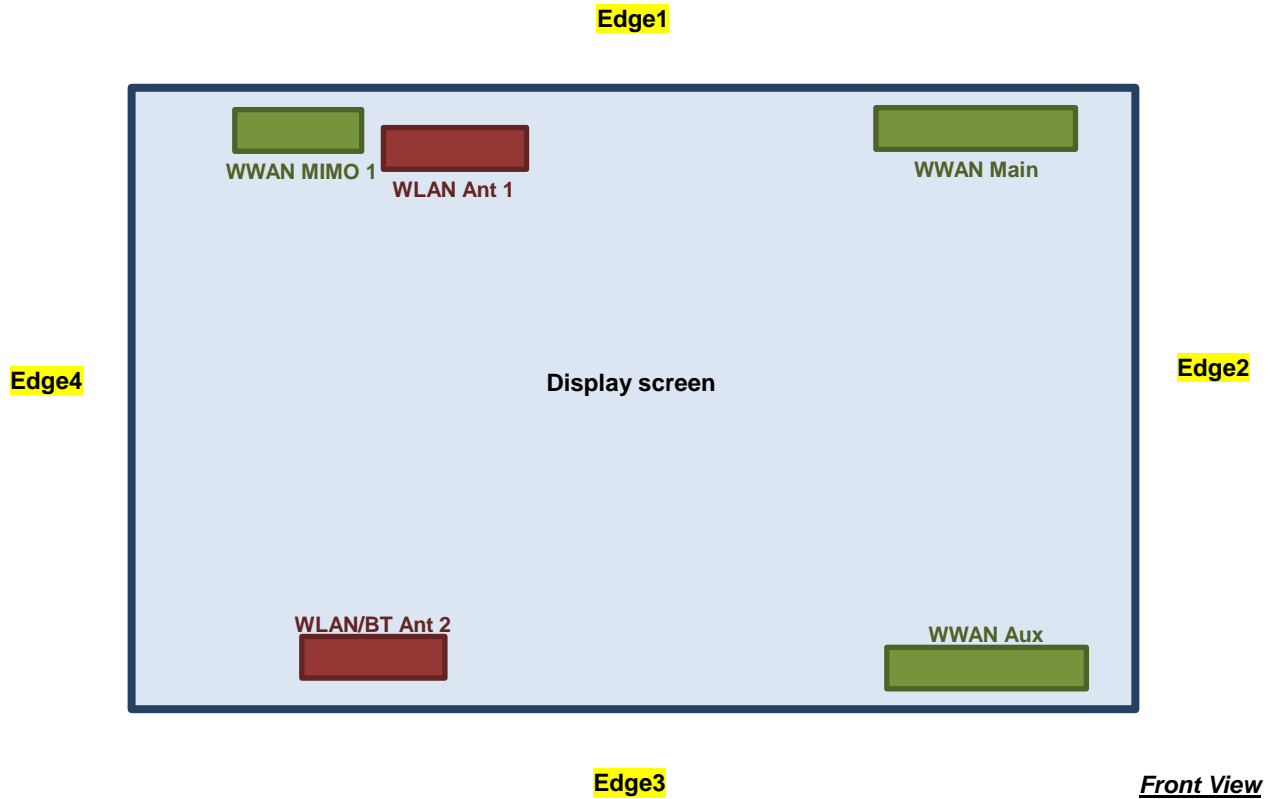


<6GHz WLAN>

WiFi 6E				Ant 1			Ant 2			Ant 1+2									
WiFi 6E	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %	Average power (dBm)	Tune-Up Limit	Duty Cycle %	Average power (dBm)	Tune-Up Limit	Duty Cycle %							
	WiFi 6E	802.11ax-HE20 MCS0	1	5955	Not required	12.00	Not required	Not required	12.00	Not required	Not required	12.00	Not required						
57			6235	12.00		12.00													
113			6515	12.00		12.00													
173			6815	12.00		12.00													
233			7115	12.00		12.00													
802.11ax-HE40 MCS0		3	5965	12.00		12.00													
		59	6245	12.00		12.00													
		107	6485	12.00		12.00													
		171	6805	12.00		12.00													
		227	7085	12.00		12.00													
802.11ax-HE80 MCS0		7	5985	12.00		12.00													
		71	6305	12.00		12.00													
		119	6545	12.00		12.00													
		167	6785	12.00		12.00													
		215	7025	12.00		12.00													
802.11ax-HE160 MCS0		15	6025	11.80		12.00			97.70			11.90		12.00	97.70	12.00	Not required	12.00	Not required
		47	6185	11.70		12.00						11.80		12.00		12.00			
		111	6505	11.70		12.00						11.80		12.00		12.00			
		175	6825	11.70		12.00						11.80		12.00		12.00			
		207	6985	11.70		12.00						11.80		12.00		12.00			

12. Antenna Location

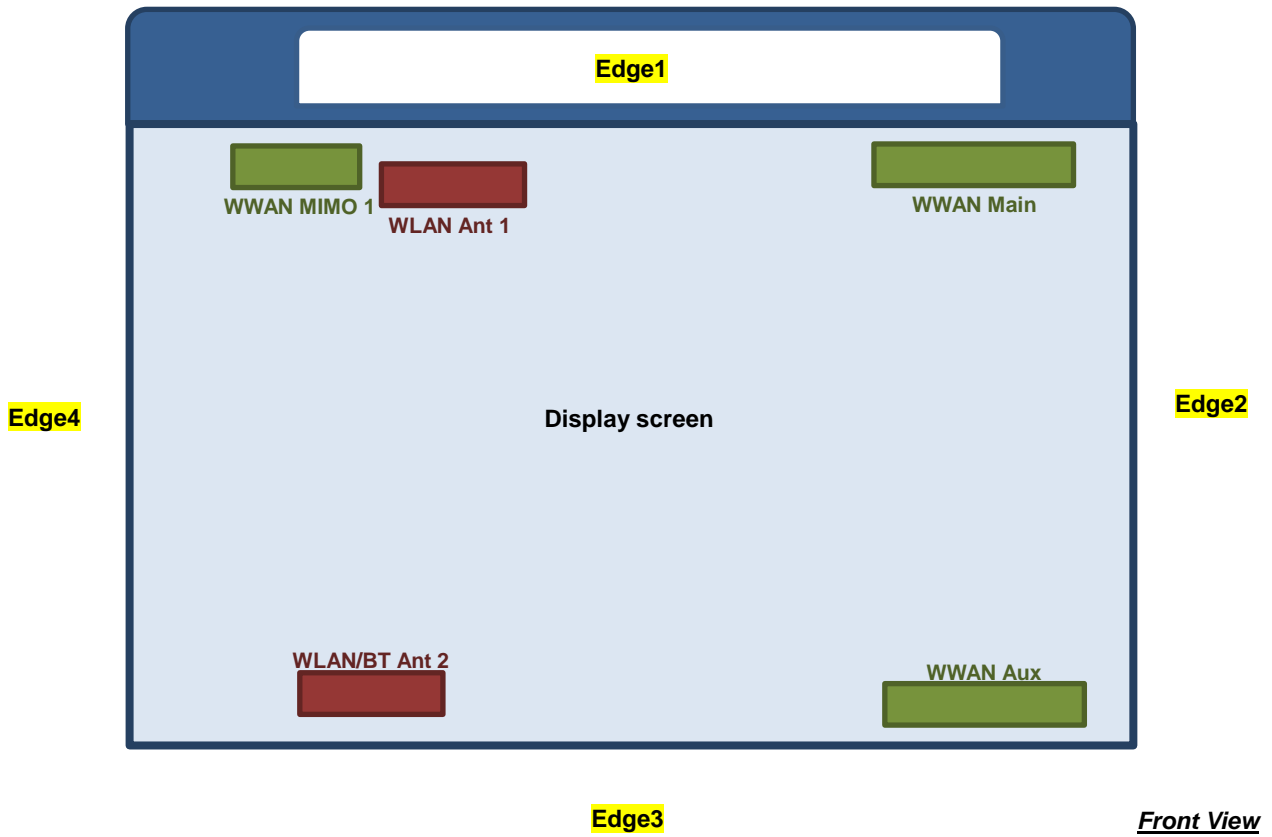
<Xslate>



The separation distance for antenna to edge :

Antenna	To Edge1 (mm)	To Edge2 (mm)	To Edge3 (mm)	To Edge4 (mm)
WWAN Main Antenna	7.76	24.45	178.98	179.16
WWAN Aux Antenna	182.2	22.01	7.02	178.16
WWAN MIMO 1 Antenna	7.38	198.15	183.97	39.25
WLAN Antenna 1	12.28	177.5	182.57	89.16
WLAN/BT Antenna 2	186.63	209.66	13.25	57.14

<Xpad>



The separation distance for antenna to edge :

Antenna	To Edge1 (mm)	To Edge2 (mm)	To Edge3 (mm)	To Edge4 (mm)
WWAN Main Antenna	67.93	27.22	180.28	181.93
WWAN Aux Antenna	242.1	23.06	8.86	179.2
WWAN MIMO 1 Antenna	66.97	200.93	185.27	42.03
WLAN Antenna 1	72.18	179.92	183.87	91.93
WLAN/BT Antenna 2	246.53	210.6	14.55	58.3



<SAR test exclusion table>

General Note:

1. SAR test exclusion table was using Xslate sample consideration.
2. The below table, when the distance is < 50 mm exclusion threshold is "Ratio", when the distance is > 50 mm exclusion threshold is "mW"
3. Maximum power is the source-based time-average power and represents the maximum RF output power among production units
4. 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.
5. 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.
6. 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:
 - $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot \sqrt{f(\text{GHz})} \leq 3.0$ for 1-g SAR and ≤ 7.5 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
7. 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	6GHz WLAN ANT 1	6GHz WLAN ANT 2
	Calculated Frequency (MHz)	6985	6985
	Maximum power (dBm)	12.0	12.0
	Maximum rated power(mW)	15.85	15.85
Bottom Face	Separation distance(mm)	5.0	5.0
	exclusion threshold	8.4	8.4
	Testing required?	Yes	Yes
Edge 1	Separation distance(mm)	12.3	186.6
	exclusion threshold	3.4	1423.0
	Testing required?	Yes	No
Edge 2	Separation distance(mm)	177.5	209.7
	exclusion threshold	1332.0	1653.0
	Testing required?	No	No
Edge 3	Separation distance(mm)	182.6	13.3
	exclusion threshold	1382.0	3.2
	Testing required?	No	Yes
Edge 4	Separation distance(mm)	89.2	57.1
	exclusion threshold	448.0	128.0
	Testing required?	No	No



13. SAR Test Results

General Note:

- Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - 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.
 - 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)"
 - For WLAN: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor
- Per KDB 447498 D01v06, for 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
- Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/kg.

WLAN Note:

- When the reported SAR of the test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is ≤ 0.8 W/kg or all required test position are tested.
- 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.
- For WLAN SAR testing was performed on single antenna RF power in SISO mode is larger or equal to the single antenna RF power in MIMO mode, and for RF exposure assessment of MIMO mode simultaneous transmission exclusion analysis was performed with SAR test results of each antenna in SISO mode.
- Per KDB 248227 D01v02r02, the simultaneous SAR provisions in KDB publication 447498 should be applied to determine simultaneous transmission SAR test exclusion for WiFi MIMO. If the sum of 1g single transmission chain SAR measurements is < 1.6W/kg and SAR peak to location ratio ≤ 0.04, no additional SAR measurements for MIMO.
- During SAR testing the WLAN transmission was verified using a spectrum analyzer.

WLAN PD Note:

- The manufacturer has confirmed that the devices tested have the same physical, mechanical and thermal characteristics and are within operational tolerances expected for production units.
- Absorbed power density (APD) using a 4cm² averaging area is reported based on SAR measurements.
- Power density was calculated by repeated E-field measurements on two measurement planes separated by λ/4.
- The device was configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools.
- Per FCC guidance and equipment manufacturer guidance, power density results were scaled according to IEC 62479:2010 for the portion of the measurement uncertainty > 30%. Total expanded uncertainty of 2.68 dB (85.4%) was used to determine the psPD measurement scaling factor.
- The measurement procedure consists of measuring the PDinc at two different distances: 2 mm (compliance distance) and λ/5. The grid extents should be large enough to fully capture the transmitted energy. The grid step should be fine enough to demonstrate that the integrated Power Density iPDn fulfill the criterion described below. Since iPD ratio between the two distances is ≥ -1dB, the grid step (0.0625) was sufficient for determining compliance at d=2mm.

$$10 \cdot \log_{10} \frac{iPD_n(2mm)}{iPD_n(\lambda/5)} \geq -1$$



13.1 Body SAR

<WLAN SAR>

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Ch.	Freq. (MHz)	Sample	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)	Measured APD (W/m ²)
	WLAN6GHz	802.11ax-HE160 MCS0	Bottom Face	0mm	Ant 1	15	6025	Xslate	11.80	12.00	1.047	97.7	1.024	0.11	0.134	0.144	0.991
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	15	6025	Xslate	11.80	12.00	1.047	97.7	1.024	-0.16	0.236	0.253	1.950
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	47	6185	Xslate	11.70	12.00	1.072	97.7	1.024	-0.1	0.222	0.244	1.930
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	111	6505	Xslate	11.70	12.00	1.072	97.7	1.024	-0.05	0.167	0.183	1.790
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	175	6825	Xslate	11.70	12.00	1.072	97.7	1.024	-0.12	0.187	0.205	1.900
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	207	6985	Xslate	11.70	12.00	1.072	97.7	1.024	-0.19	0.190	0.208	1.860
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	0mm	Ant 1	15	6025	Xpad	11.80	12.00	1.047	97.7	1.024	0.03	0.087	0.093	0.716
	WLAN6GHz	802.11ax-HE160 MCS0	Bottom Face	0mm	Ant 2	15	6025	Xslate	11.90	12.00	1.023	97.7	1.024	0.03	0.176	0.184	1.350
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	15	6025	Xslate	11.90	12.00	1.023	97.7	1.024	-0.01	0.245	0.257	1.940
01	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	47	6185	Xslate	11.80	12.00	1.047	97.7	1.024	-0.08	0.253	0.271	2.120
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	111	6505	Xslate	11.80	12.00	1.047	97.7	1.024	0	0.224	0.240	1.680
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	175	6825	Xslate	11.80	12.00	1.047	97.7	1.024	-0.06	0.212	0.227	1.530
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	207	6985	Xslate	11.80	12.00	1.047	97.7	1.024	0.02	0.179	0.192	1.460
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	0mm	Ant 2	47	6185	Xpad	11.80	12.00	1.047	97.7	1.024	0.07	0.231	0.248	2.030

13.2 6GHz PD Test Result

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Sample	Ch.	Freq. (MHz)	Average Power (dBm)	Grid Step (λ)	iPDn	iPD ratio (≥ -1)	Normal psPD (W/m ²)	Total psPD (W/m ²)
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	15	6025	11.80	0.0625	1.97	0.56420123	2.13	2.23
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	10mm	Ant 1	Xslate	15	6025	11.80	0.25	1.73		1.2	1.9
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	207	6985	11.70	0.0625	2.15	-0.25496387	1.79	1.94
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	8.59mm	Ant 1	Xslate	207	6985	11.70	0.25	2.28		1.17	1.25

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Sample	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Grid Step (λ)	Scaling Factor for Measurement Uncertainty	Power Drift (dB)	Normal psPD (W/m ²)	Scaled Normal psPD (W/m ²)	Total psPD (W/m ²)	Scaled Total psPD (W/m ²)
02	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	15	6025	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	-0.14	2.13	3.55	2.23	3.71
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	47	6185	11.70	12.00	1.072	97.70	1.024	0.0625	1.5535	0.07	1.66	2.83	1.85	3.15
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	111	6505	11.70	12.00	1.072	97.70	1.024	0.0625	1.5535	0.16	1.66	2.83	1.73	2.95
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	175	6825	11.70	12.00	1.072	97.70	1.024	0.0625	1.5535	-0.02	1.8	3.07	1.94	3.31
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xslate	207	6985	11.70	12.00	1.072	97.70	1.024	0.0625	1.5535	-0.01	1.79	3.05	1.94	3.31
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 1	2mm	Ant 1	Xpad	15	6025	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	0.03	0.315	0.52	0.325	0.54
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xslate	15	6025	11.90	12.00	1.023	97.70	1.024	0.0625	1.5535	0.02	1.39	2.26	1.51	2.46
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xslate	47	6185	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	-0.18	1.58	2.63	1.62	2.70
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xslate	111	6505	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	-0.03	1.51	2.52	1.83	3.05
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xslate	175	6825	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	0.02	1.41	2.35	1.72	2.87
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xslate	207	6985	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	-0.04	1.38	2.30	1.61	2.68
	WLAN6GHz	802.11ax-HE160 MCS0	Edge 3	2mm	Ant 2	Xpad	111	6505	11.80	12.00	1.047	97.70	1.024	0.0625	1.5535	-0.06	1.67	2.78	1.68	2.80

14. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Body
1.	WWAN + 2.4GHz WLAN Ant 1 + 2.4GHz WLAN Ant 2	Yes
2.	WWAN + 2.4GHz WLAN Ant 1 + Bluetooth Ant 2	Yes
3.	WWAN + 5/6GHz WLAN Ant 1 + 5/6GHz WLAN Ant 2 + Bluetooth Ant 2	Yes

General Note:

1. Based on the original filing Sporton SAR report No.: FA181117 to additional WLAN 6GHz RF exposure to do Sim-Tx analysis with WWAN transmitter, the other RF Exposure result also refer to original report.
2. WLAN RF exposure assessment of MIMO mode simultaneous transmission exclusion analysis was performed with SAR test results of each antenna in SISO mode. Therefore SPLSR calculation was choose worst case with SAR test results of each antenna in SISO mode perform evaluation.
3. The Scaled SAR summation is calculated based on the same configuration and test position from each transmit antenna.
4. Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
 - i) Scalar SAR summation < 1.6W/kg.
 - ii) $SPLSR = (SAR1 + SAR2)^{1.5} / (\text{min. separation distance, mm})$, 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 $SPLSR \leq 0.04$, 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 14.2.

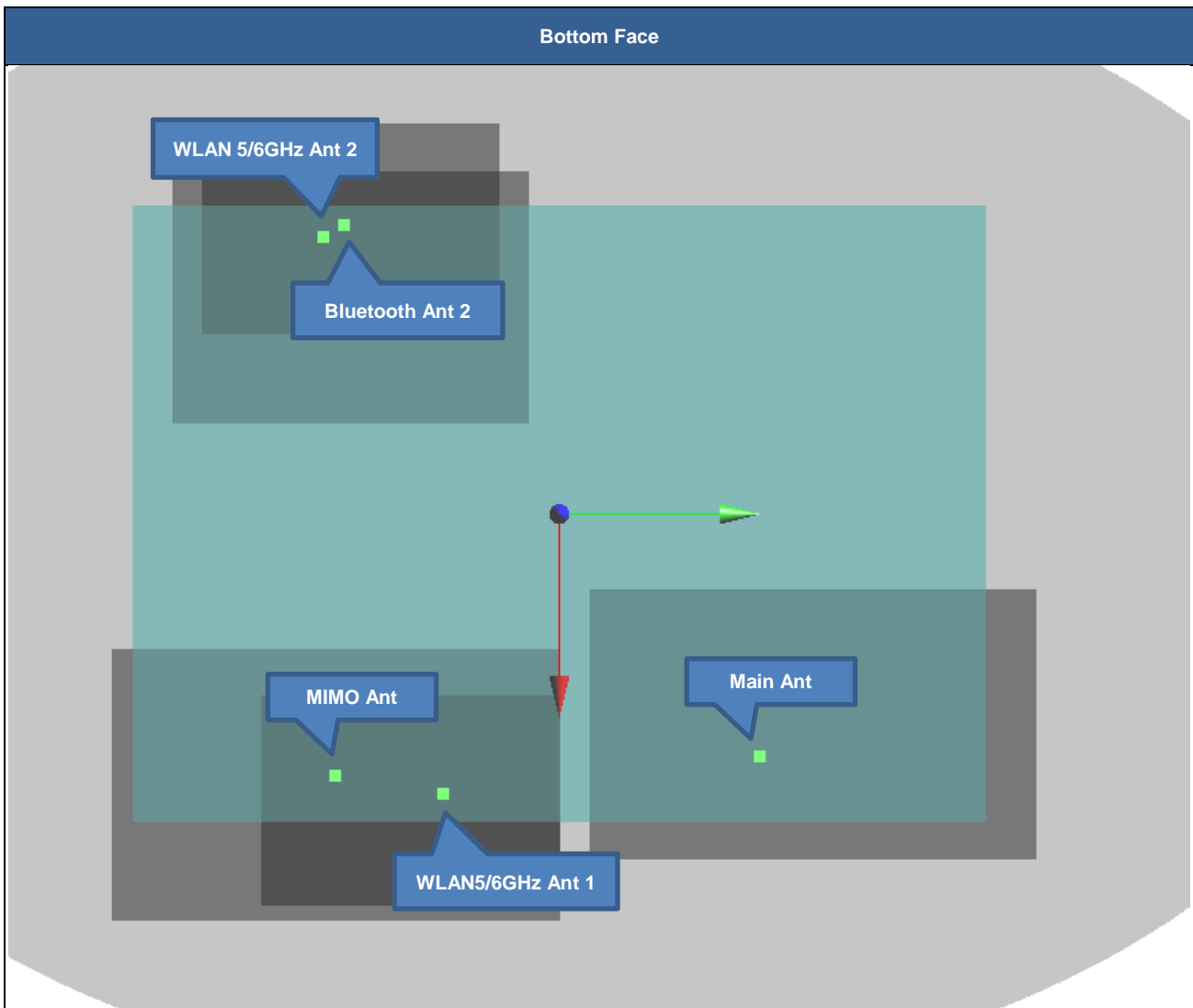
14.1 Body Exposure Conditions

WWAN Band	Exposure Position	1	2	3	4	5	6	1+2+3 Summed 1g SAR (W/kg)	1+2+6 Summed 1g SAR (W/kg)	1+4+5+6 Summed 1g SAR (W/kg)	SPLSR	Case No
		WWAN 1g SAR (W/kg)	WLAN2.4GHz Ant 1 1g SAR (W/kg)	WLAN2.4GHz Ant 2 1g SAR (W/kg)	WLAN5/6GHz Ant 1 1g SAR (W/kg)	WLAN5/6GHz Ant 2 1g SAR (W/kg)	Bluetooth Ant 2 1g SAR (W/kg)					
MAX MAIN ANT	Bottom Face at 0mm	1.181	0.162	0.124	0.252	0.213	0.019	1.467	1.362	1.665	0.02	Case1
	Edge 1 at 0mm	1.180	0.322		0.506			1.502	1.502	1.686	0.02	Case2
	Edge 2 at 0mm	0.232						0.232	0.232	0.232		
	Edge 3 at 0mm			0.365		0.580	0.071	0.365	0.071	0.651		
	Edge 4 at 0mm							0.000	0.000	0.000		
MAX MIMO ANT	Bottom Face at 0mm	0.993	0.162	0.124	0.252	0.213	0.019	1.279	1.174	1.477	0.04	
	Edge 1 at 0mm	0.997	0.322		0.506			1.319	1.319	1.503		
	Edge 2 at 0mm							0.000	0.000	0.000		
	Edge 3 at 0mm			0.365		0.580	0.071	0.365	0.071	0.651		
	Edge 4 at 0mm	0.281						0.281	0.281	0.281		
MAX AUX ANT	Bottom Face at 0mm	0.412	0.162	0.124	0.252	0.213	0.019	0.698	0.593	0.896		
	Edge 1 at 0mm		0.322		0.506			0.322	0.322	0.506		
	Edge 2 at 0mm	0.124						0.124	0.124	0.124		
	Edge 3 at 0mm	1.179		0.365		0.580	0.071	1.544	1.250	1.830	0.02	Case3
	Edge 4 at 0mm							0.000	0.000	0.000		

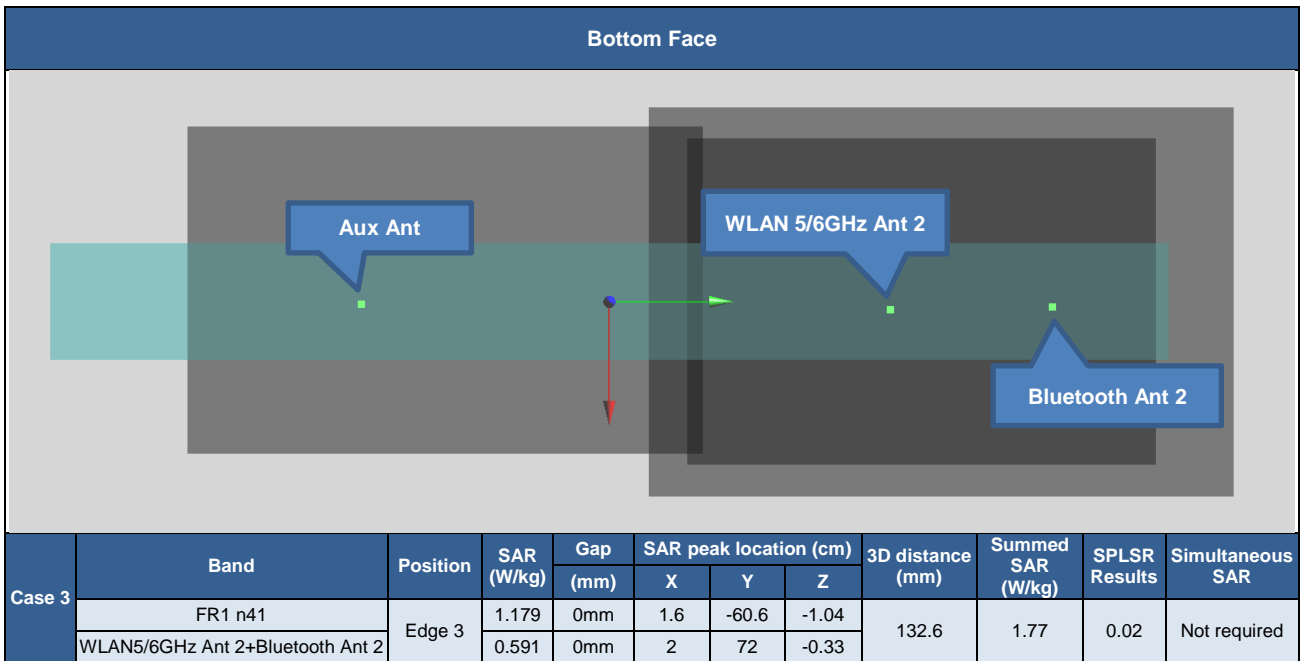
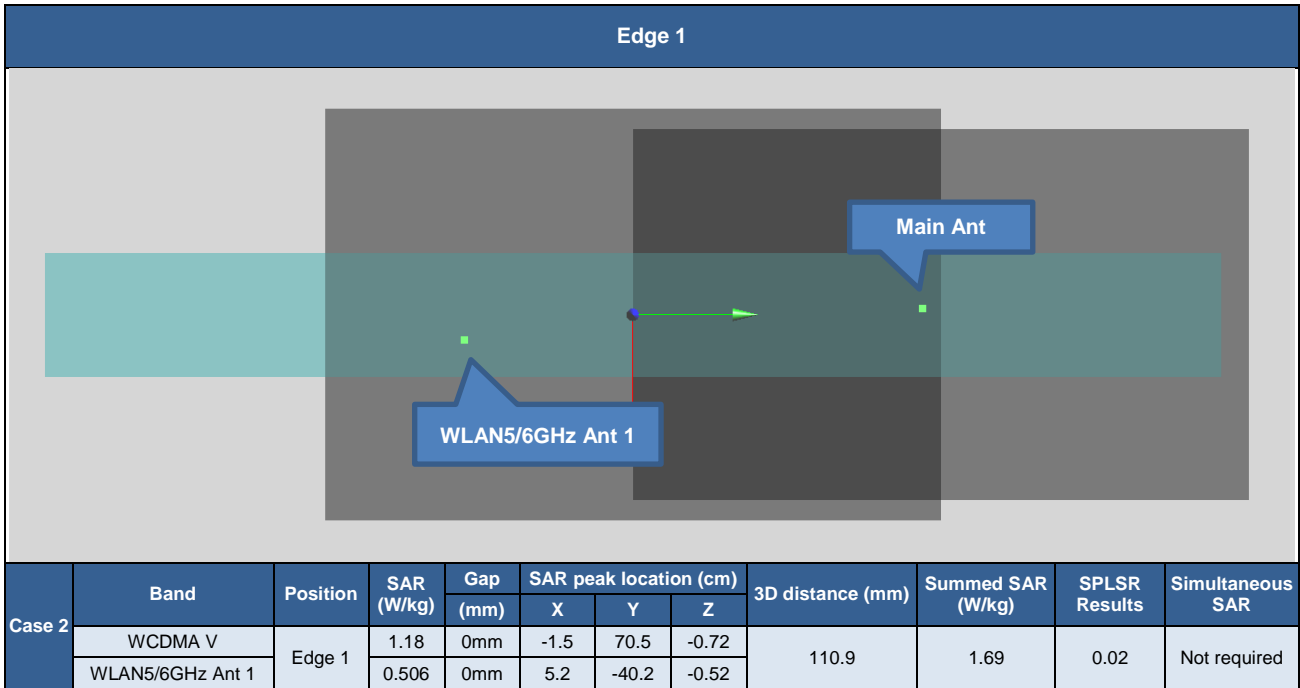
14.2 SPLSR Evaluation and Analysis

General Note:

1. $SPLSR = (SAR_1 + SAR_2)^{1.5} / (min. \text{ separation distance, mm})$. If $SPLSR \leq 0.04$, simultaneously transmission SAR measurement is not necessary
2. The hotspot point in each exposure condition are showing as below figure and the minimum 3D distance for each sum combination is used for SPLSR analysis.
3. 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.



Case 1	Band	Position	SAR (W/kg)	Gap (mm)	SAR peak location (mm)			3D distance (mm)	Summed SAR (W/kg)	SPLSR Results	Simultaneous SAR
					X	Y	Z				
	FR1 n12	Bottom Face	1.181	0mm	82.1	67	-0.12	106.6	1.56	0.02	Not required
	WLAN5/6GHz Ant 1	Bottom Face	0.383	0mm	93	-39	-0.1				
	FR1 n12	Bottom Face	1.181	0mm	82.1	67	-0.12	224.3	1.41	0.01	Not required
	WLAN5/6GHz Ant 2+Bluetooth Ant 2	Bottom Face	0.232	0mm	-88.8	-78.2	-0.05				
	WLAN5/6GHz Ant 1	Bottom Face	0.383	0mm	93	-39	-0.1	186.0	0.62	0.00	Not required
	WLAN5/6GHz Ant 2+Bluetooth Ant 2	Bottom Face	0.232	0mm	-88.8	-78.2	-0.05				



Test Engineer : Jay Chien and Bevis Chang

15. Uncertainty Assessment

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.

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A 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.

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 ^(a)	1/k ^(b)	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) κ is the coverage factor

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.

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.



Applicable for SAR Measurements:

Uncertainty Budget (4 MHz - 10 GHz range)							
Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)
Measurement System							
Probe Calibration	18.60	N	2	1	1	9.3	9.3
Axial Isotropy	4.70	R	1.732	0.7	0.7	1.9	1.9
Hemispherical Isotropy	9.60	R	1.732	0.7	0.7	3.9	3.9
Linearity	4.70	R	1.732	1	1	2.7	2.7
Modulation Response	4.68	R	1.732	1	1	2.7	2.7
System Detection Limits	1.00	R	1.732	1	1	0.6	0.6
Boundary Effects	2.00	R	1.732	1	1	1.2	1.2
Readout Electronics	0.30	N	1	1	1	0.3	0.3
Response Time	0.00	R	1.732	1	1	0.0	0.0
Integration Time	2.60	R	1.732	1	1	1.5	1.5
RF Ambient Noise	3.00	R	1.732	1	1	1.7	1.7
RF Ambient Reflections	3.00	R	1.732	1	1	1.7	1.7
Probe Positioner	0.40	R	1.732	1	1	0.2	0.2
Probe Positioning	6.70	R	1.732	1	1	3.9	3.9
Post-processing	4.00	R	1.732	1	1	2.3	2.3
Test Sample Related							
Device Holder	3.60	N	1	1	1	3.6	3.6
Test sample Positioning	3.03	N	1	1	1	3.0	3.0
Power Scaling	0.00	R	1.732	1	1	0.0	0.0
Power Drift	5.00	R	1.732	1	1	2.9	2.9
Phantom and Setup							
Phantom Uncertainty	7.60	R	1.732	1	1	4.4	4.4
SAR correction	0.00	R	1.732	1	0.84	0.0	0.0
Liquid Conductivity Repeatability	0.03	N	1	0.78	0.77	0.0	0.0
Liquid Conductivity (target)	5.00	R	1.732	0.78	0.77	2.3	2.2
Liquid Conductivity (mea.)	2.50	R	1.732	0.78	0.77	1.1	1.1
Temp. unc. - Conductivity	3.68	R	1.732	0.78	0.77	1.7	1.6
Liquid Permittivity Repeatability	0.02	N	1	0.23	0.26	0.0	0.0
Liquid Permittivity (target)	5.00	R	1.732	0.23	0.26	0.7	0.8
Liquid Permittivity (mea.)	2.50	R	1.732	0.23	0.26	0.3	0.4
Temp. unc. - Permittivity	0.84	R	1.732	0.23	0.26	0.1	0.1
Combined Std. Uncertainty						14.5%	14.2%
Coverage Factor for 95 %						K=2	K=2
Expanded STD Uncertainty						29.0%	28.4%



Applicable for Power Density Measurements:

Error Description	Uncertainty Value (±dB)	Probability	Divisor	(Ci)	Standard Uncertainty (±dB)
Probe Calibration	0.49	N	1	1	0.49
Probe correction	0.00	R	1.732	1	0.00
Frequency response (BW ≤ 1 GHz)	0.20	R	1.732	1	0.12
Sensor cross coupling	0.00	R	1.732	1	0.00
Isotropy	0.50	R	1.732	1	0.29
Linearity	0.20	R	1.732	1	0.12
Probe scattering	0.00	R	1.732	1	0.00
Probe positioning offset	0.30	R	1.732	1	0.17
Probe positioning repeatability	0.04	R	1.732	1	0.02
Sensor mechanical offset	0.00	R	1.732	1	0.00
Probe spatial resolution	0.00	R	1.732	1	0.00
Field impedance dependence	0.00	R	1.732	1	0.00
Amplitude and phase drift	0.00	R	1.732	1	0.00
Amplitude and phase noise	0.04	R	1.732	1	0.02
Measurement area truncation	0.00	R	1.732	1	0.00
Data acquisition	0.03	N	1	1	0.03
Sampling	0.00	R	1.732	1	0.00
Field reconstruction	2.00	R	1.732	1	1.15
Forward transformation	0.00	R	1.732	1	0.00
Power density scaling	0.00	R	1.732	1	0.00
Spatial averaging	0.10	R	1.732	1	0.06
System detection limit	0.04	R	1.732	1	0.02
Uncertainty terms dependent on the DUT and environmental factors					
Probe coupling with DUT	0.00	R	1.732	1	0.0
Modulation response	0.40	R	1.732	1	0.2
Integration time	0.00	R	1.732	1	0.0
Response time	0.00	R	1.732	1	0.0
Device holder influence	0.10	R	1.732	1	0.1
DUT alignment	0.00	R	1.732	1	0.0
RF ambient conditions	0.04	R	1.732	1	0.0
Ambient reflections	0.04	R	1.732	1	0.0
Immunity / secondary reception	0.00	R	1.732	1	0.0
Drift of the DUT		R	1.732	1	
Combined Std. Uncertainty					1.34
Expanded STD Uncertainty (95%)					2.68



16. References

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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 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.
- [10] IEC/IEEE 62209-1528:2020, “Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices – Part 1528: Human models, instrumentation, and procedures (Frequency range of 4 MHz to 10 GHz)”, Oct. 2020
- [11] SPEAG DASY6 System Handbook
- [12] SPEAG DASY6 Application Note (Interim Procedure for Device Operation at 6GHz-10GHz)