

FCC SAR Measurement and Test Report

For

Shenzhen Concox Information Technology Co., Ltd.

Floor 4th, Building B, Gaoxinqi Industrial Park, Liuxian 1st Road, District

67, Bao'an, Shenzhen, China

FCC ID: X7I-AT4H

FCC Rules:	FCC Part 2.1093 ANSI / IEEE C95.1 :2005+A1:2010 ANSI / IEEE C95.3 :2002(R2008) <u>IEEE 1528 :2013</u>
Product Description:	<u>Asset GPS tracker</u>
Tested Model:	<u>AT4H</u>
Report No.:	<u>WTX19X06037126W-4</u>
Sample Received Date:	<u>2019-06-06</u>
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TABLE OF CONTENTS

1. General Information	3
1.1 Product Description for Equipment Under Test (EUT).....	3
1.2 Test Standards	5
1.3 Test Methodology.....	5
1.4 Test Facility	5
2. Summary of Test Results	6
3. Specific Absorption Rate (SAR).....	7
3.1 Introduction.....	7
3.2 SAR Definition	7
4. SAR Measurement System	8
4.1 The Measurement System	8
4.2 Probe.....	8
4.3 Probe Calibration Process.....	10
4.4 Phantom	11
4.5 Device Holder.....	11
4.6 Test Equipment List.....	12
5. Tissue Simulating Liquids.....	13
5.1 Composition of Tissue Simulating Liquid.....	13
5.2 Tissue Dielectric Parameters for Head and Body Phantoms.....	14
5.3 Tissue Calibration Result.....	15
6. SAR Measurement Evaluation	16
6.1 Purpose of System Performance Check.....	16
6.2 System Setup	16
6.3 Validation Results.....	17
7. EUT Testing Position	18
7.1 EUT Antenna Position	18
7.2 EUT Testing Position.....	19
8. SAR Measurement Procedures.....	20
8.1 Measurement Procedures	20
8.2 Spatial Peak SAR Evaluation	20
8.3 Area & Zoom Scan Procedures.....	21
8.4 Volume Scan Procedures.....	21
8.5 SAR Averaged Methods	21
8.6 Power Drift Monitoring.....	21
9. SAR Test Result	22
9.1 Conducted RF Output Power	22
9.2 Test Results for Standalone SAR Test.....	24
9.3 Simultaneous Multi-band Transmission SAR Analysis	25
10. Measurement Uncertainty	27
10.1 Uncertainty for EUT SAR Test.....	27
10.2 Uncertainty for System Performance Check.....	28
Annex A. Plots of System Performance Check	30
Annex B. Plots of SAR Measurement.....	38
Annex C. EUT Photos	41
Annex D. Test Setup Photos	45
Annex E. Calibration Certificate.....	48

1. General Information

1.1 Product Description for Equipment Under Test (EUT)

Client Information

Applicant: Shenzhen Concox Information Technology Co., Ltd
Address of applicant: Floor 4th, Building B, Gaoxinqi Industrial Park, Liuxian 1st Road, District 67, Bao'an, Shenzhen, China

Manufacturer: Shenzhen Concox Information Technology Co., Ltd
Address of manufacturer: Floor 4th, Building B, Gaoxinqi Industrial Park, Liuxian 1st Road, District 67, Bao'an, Shenzhen, China

General Description of EUT:	
Product Name:	Asset GPS tracker
Brand Name:	CONCOX
Model No.:	AT4H
Adding Model(s):	/
Rated Voltage:	DC3.7V
Battery:	10000mAh
<i>Note: The test data is gathered from a production sample provided by the manufacturer.</i>	

Technical Characteristics of EUT	
2G	
Support Networks:	GSM, GPRS
Support Band:	GSM850/PCS1900
Uplink Frequency:	GSM/GPRS 850: 824~849MHz GSM/GPRS 1900: 1850~1910MHz
Downlink Frequency:	GSM/GPRS 850: 869~894MHz GSM/GPRS 1900: 1930~1990MHz
Max RF Output Power:	GSM850: 32.54dBm, GSM1900: 30.16dBm
Type of Modulation:	GMSK
Antenna Type:	Internal Antenna
Antenna Gain:	GSM850: :-2dBi; GSM1900: 0dBi
GPRS Class:	Class 12
Bluetooth	
Bluetooth Version:	V5.0(only BDR/EDR)
Frequency Range:	2402-2480MHz
AV Output Power:	-0.276dBm (Conducted)
Data Rate:	1Mbps
Modulation:	GFSK, Pi/4 QDPSK, 8DPSK
Quantity of Channels:	79
Channel Separation:	1MHz
Antenna Type:	Integral Antenna
Antenna Gain:	0.5dBi

1.2 Test Standards

The following report is prepared on behalf of the Shenzhen Concox Information Technology Co., Ltd in accordance with IEEE 1528 :2013, FCC 47 CFR Part 2.1093, ANSI / IEEE C95.1 :2005+A1:2010, ANSI / IEEE C95.3 :2002(R2008)

KDB 865664 D01 v01r04, KDB 865664 D02 v01r02, KDB 447498 D01 v06 and KDB 248227 D01 v02r02.

The objective is to determine compliance with FCC Part 2.1093 of the Federal Communication Commissions rules.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product, which result in lowering the emission, should be checked to ensure compliance has been maintained.

1.3 Test Methodology

All measurements contained in this report were conducted with KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02. The public notice KDB 447498 D01 v06 for Mobile and Portable Devices RF Exposure Procedure also.

1.4 Test Facility

FCC – Registration No.: 125990

Shenzhen SEM Test Technology Co., Ltd. Laboratory has been recognized to perform compliance testing on equipment subject to the Commissions Declaration Of Conformity (DOC). The Designation Number is CN5010, and Test Firm Registration Number is 125990.

Industry Canada (IC) Registration No.: 11464A

The 3m Semi-anechoic chamber of Shenzhen SEM.Test Technology Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 11464A.

2. Summary of Test Results

The maximum results of Specific Absorption Rate (SAR) have found during testing are as follows:

Body(5mm Gap)

Frequency Band	Maximum SAR _{1g} (W/kg)	SAR _{1g} Limit (W/kg)
GSM850	1.425	1.6
GSM1900	0.464	1.6
Simultaneous Transmission	1.446	1.6

*The highest reported SAR values body and Simultaneous Transmission are **1.425W/kg and 1.446W/kg** respectively*

The device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2.1093 and ANSI / IEEE C95.1 :2005+A1:2010, and had been tested in accordance with the measurement methods and procedure specified in KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02

3. Specific Absorption Rate (SAR)

3.1 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.

3.2 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:

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

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

SAR measurement can be either related to the temperature elevation in tissue by

$$\text{SAR} = C \left(\frac{\delta T}{\delta t} \right)$$

Where: C is the specific heat capacity, δT is the temperature rise and δt is the exposure duration, or related to the electrical field in the tissue by

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

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

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

4. SAR Measurement System

4.1 The Measurement System

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

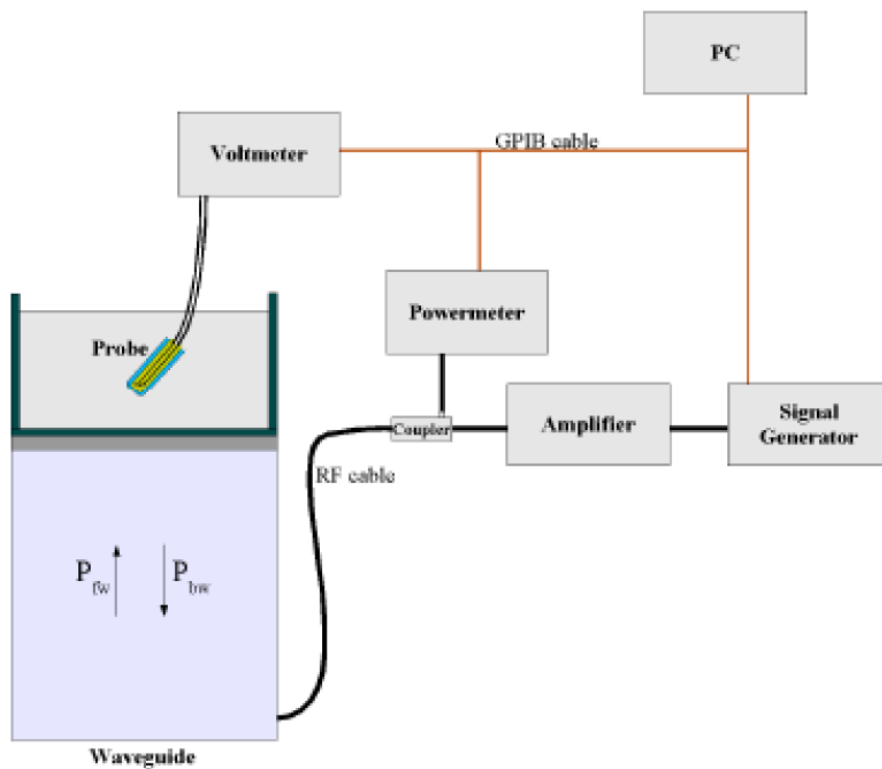
4.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SSE5 SN 09/13 EP168 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Probe Length: 330 mm
- Length of Individual Dipoles: 4.5 mm
- Maximum external diameter: 8 mm
- Probe Tip External Diameter : 5 mm
- Distance between dipoles / probe extremity: 2.7mm

- Probe linearity: <0.25 dB
 - Axial Isotropy: <0.25 dB
 - Spherical Isotropy: <0.50 dB
 - Calibration range: 700 to 3000MHz for head & body simulating liquid.
- Angle between probe axis (evaluation axis) and surface normal line: less than 30°

Probe calibration is realized, in compliance with EN 62209-1 and IEEE 1528 STD, with CALISAR, Antenna proprietary calibration system. The calibration is performed with the EN 62209-1 annexe technique using reference guide at the five frequencies.



$$SAR = \frac{4(P_{fw} - P_{bw})}{ab\delta} \cos^2\left(\pi \frac{y}{a}\right) e^{-2z/\delta}$$

Where :

P_{fw} = Forward Power

P_{bw} = Backward Power

a and b = Waveguide dimensions

δ = Skin depth

Keithley configuration:

Rate = Medium; Filter = ON; RDGS = 10; Filter type = Moving Average; Range auto after each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors, CF(N), for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N)=SAR(N)/V_{lin}(N) \quad (N=1,2,3)$$

The linearised output voltage $V_{lin}(N)$ is obtained from the displayed output voltage $V(N)$ using

$$V_{lin}(N)=V(N)*(1+V(N)/DCP(N)) \quad (N=1,2,3)$$

where DCP is the diode compression point in mV.

4.3 Probe Calibration Process

Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm²) using an with CALISAR, Antenna proprietary calibration system.

Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1mW/cm².

Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

Where:

$$SAR = C \frac{\Delta T}{\Delta t}$$

Δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

ΔT = temperature increase due to RF exposure.

SAR is proportional to $\Delta T / \Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

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

Where:

σ = simulated tissue conductivity,

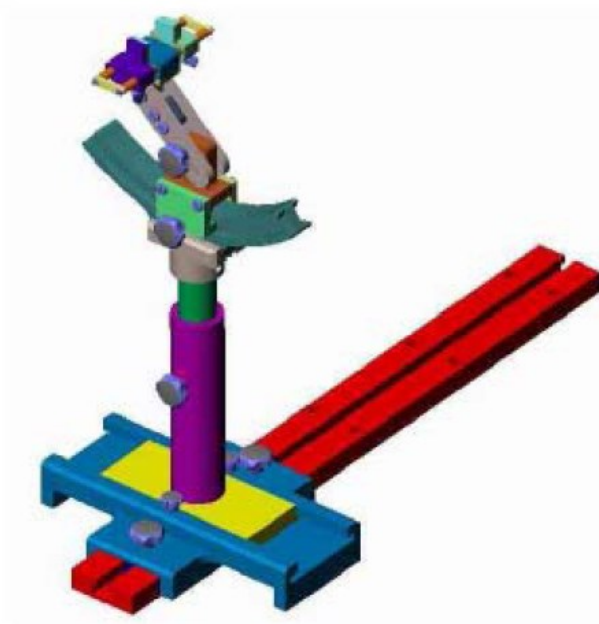
ρ = Tissue density (1.25 g/cm³ for brain tissue)

4.4 Phantom

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.

4.5 Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1°.



System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

4.6 Test Equipment List

Description	Manufacturer	Model	Serial Number	Cal. Date	Due. Date
E-Field Probe	SATIMO	SSE5	SN 09/13 EP168	2019-05-22	2020-05-21
835MHz Dipole	SATIMO	SID835	SN 47/12 DIP 0G835-204	2019-03-16	2020-03-15
1900MHz Dipole	SATIMO	SID1900	SN 47/12 DIP 1G900-207	2019-03-16	2020-03-15
Dielectric Probe Kit	SATIMO	SCLMP	SN 47/12 OCPG49	2019-03-16	2020-03-15
SAM Phantom	SATIMO	SAM	SN/ 47/12 SAM95	N/A	N/A
MULTIMETER	KEITHLEY	Keithley 2000	4006367	2019-04-30	2020-04-29
Signal Generator	Rohde & Schwarz	SMR20	100047	2019-04-30	2020-04-29
Universal Tester	Rohde & Schwarz	CMU200	112012	2019-04-30	2020-04-29
Network Analyzer	HP	8753C	2901A00831	2019-04-30	2020-04-29
Directional Couplers	Agilent	778D	20160	2019-04-30	2020-04-29

5. Tissue Simulating Liquids

5.1 Composition of Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with SMTIMO, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. Please see the following photos for the liquid height.



Liquid Height for Head SAR



Liquid Height for Body SAR

The Composition of Tissue Simulating Liquid

Frequency (MHz)	Water (%)	Salt (%)	Sugar (%)	HEC (%)	Preventol (%)	DGBE (%)
Body						
835	50.8	0.9	48.1	0.1	0.1	0
1900	70.2	0.4	0	0	0	29.4

5.2 Tissue Dielectric Parameters for Head and Body Phantoms

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

Target Frequency (MHz)	Head		Body	
	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity (σ)	Permittivity (ϵ_r)
150	0.76	52.3	0.80	61.9
300	0.87	45.3	0.92	58.2
450	0.87	43.5	0.94	56.7
835	0.90	41.5	0.97	55.2
900	0.97	41.5	1.05	55.0
915	0.98	41.5	1.06	55.0
1450	1.20	40.5	1.30	54.0
1610	1.29	40.3	1.40	53.8
1800-2000	1.40	40.0	1.52	53.3
2450	1.80	39.2	1.95	52.7
3000	2.40	38.5	2.73	52.0
5800	5.27	35.3	6.00	48.2

5.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using COMOSAR Dielectric Probe Kit and an Agilent Network Analyzer.

Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

Body Tissue Simulating Liquid									
Freq. MHz.	Temp. (°C)	Conductivity			Permittivity			Limit (%)	Date
		Reading (σ)	Target (σ)	Delta (%)	Reading (ϵ_r)	Target (ϵ_r)	Delta (%)		
835	21.2	0.96	0.97	-1.03	54.99	55.20	-0.38	±5	2019-06-24
1900	21.3	1.46	1.52	-3.95	52.38	53.30	-1.73	±5	2019-06-25

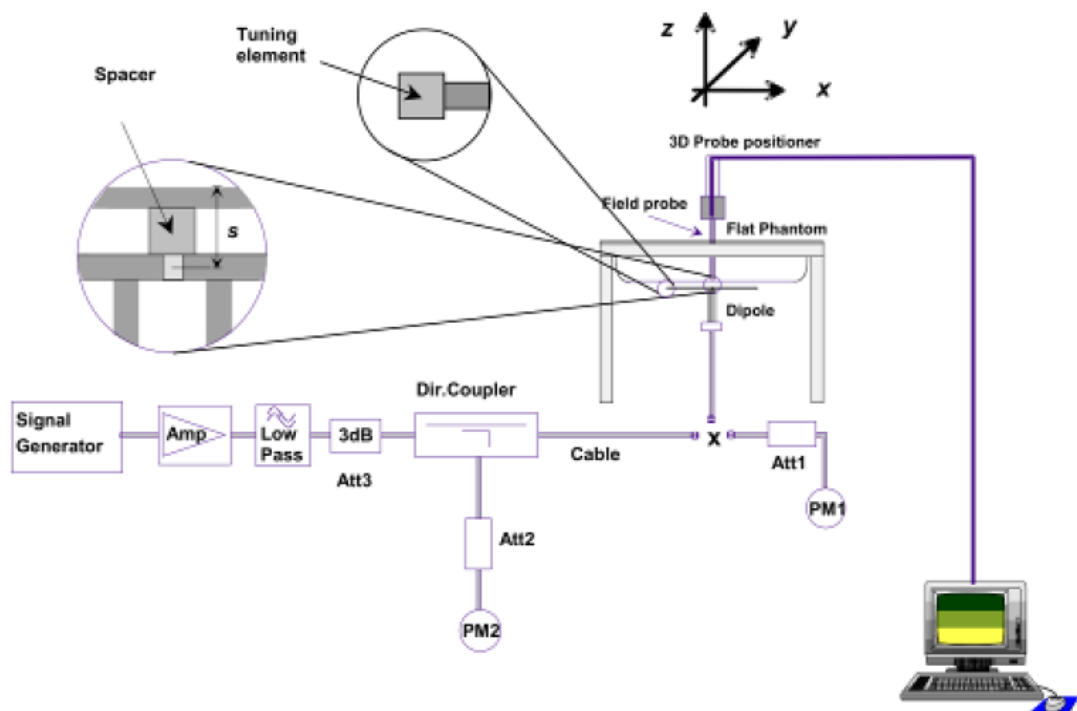
6. SAR Measurement Evaluation

6.1 Purpose of System Performance Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

6.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 835 MHz, 1900 MHz and 2450 MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom.



System Verification Setup Block Diagram



Setup Photo of Dipole Antenna

The output power on dipole port must be calibrated to 24 dBm (250 mW) before dipole is connected.

6.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. Table 6.1 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.

Frequency	Targeted SAR _{1g}	Measured SAR _{1g}	Normalized SAR _{1g}	Tolerance
MHz	(W/kg)	(W/kg)	(W/kg)	(%)
Head				
835	9.65	2.41	9.64	-0.10
1900	39.59	9.98	39.92	0.83

Frequency	Targeted SAR _{1g}	Measured SAR _{1g}	Normalized SAR _{1g}	Tolerance
MHz	(W/kg)	(W/kg)	(W/kg)	(%)
Body				
835	9.36	2.38	9.52	1.71
1900	39.01	9.85	39.4	1.00

Targeted and Measurement SAR

Please refer to Annex A for the plots of system performance check.

7. EUT Testing Position

7.1 EUT Antenna Position



Block Diagram for EUT Antenna Position

7.2 EUT Testing Position

Body/ Front of face SAR assessments are required for this device. This EUT was tested in different positions for different SAR test modes, more information as below:

Body SAR tests, Test distance: 5mm						
Antennas	Front	Back	Right Side	Left Side	Top Side	Bottom Side
WWAN	Yes	Yes	Yes	Yes	Yes	No

Remark:

1. Referring to KDB 447498 D01,v06, Devices that are designed to operate on the body of users using lanyards and straps or without requiring additional body-worn accessories must be tested for SAR compliance using a conservative minimum test separation distance ≤ 5 mm to support compliance, so the test separation distances is 5 mm.

Please refer to Annex D for the EUT test setup photos.

8. SAR Measurement Procedures

8.1 Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the highest power channel.
- (b) Keep EUT to radiate maximum output power or 100% factor (if applicable)
- (c) Measure output power through RF cable and power meter.
- (d) Place the EUT in the positions as Annex E demonstrates.
- (e) Set scan area, grid size and other setting on the SATIMO software.
- (f) Measure SAR results for the highest power channel on each testing position.
- (g) Find out the largest SAR result on these testing positions of each band
- (h) Measure SAR results for other channels in worst SAR testing position if the SAR of highest power channel is larger than 0.8 W/kg

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

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

8.2 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 SATIMO 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. 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
- (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 3D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

8.3 Area & Zoom Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures 5x5x7 points with step size 8, 8 and 5 mm for 300 MHz to 3 GHz, and 8x8x8 points with step size 4, 4 and 2.5 mm for 3 GHz to 6 GHz. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g.

8.4 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 (step-size is 4, 4 and 2.5 mm). When all volume scan were completed, the software can combine and subsequently superpose these measurement data to calculating the multiband SAR.

8.5 SAR Averaged Methods

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10g and 1 g requires a very fine resolution in the three dimensional scanned data array.

8.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In SATIMO 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 drift more than 5%, the SAR will be retested.

9. SAR Test Result

9.1 Conducted RF Output Power

GSM - Burst Average Power (dBm)								
Band	GSM850			Tune-up power (dBm)	PCS1900			Tune-up power (dBm)
Channel	128	190	251		512	661	810	
Frequency (MHz)	824.2	836.6	848.8		1850.2	1880	1909.8	
GSM	32.54	32.46	32.46	33.0	30.16	30.00	30.03	30.5
GPRS (1 slot)	32.24	32.27	32.37	32.5	30.16	29.94	30.01	30.5
GPRS (2 slots)	31.12	30.95	31.07	31.5	29.58	29.37	29.08	30.0
GPRS (3 slots)	28.82	28.88	28.98	29.0	28.02	27.68	27.40	28.5
GPRS (4 slots)	27.66	27.76	27.72	28.0	27.22	26.69	27.29	27.5

GSM - Source-Based Time-Average Power (dBm)								
Band	GSM850			Tune-up power (dBm)	PCS1900			Tune-up power (dBm)
Channel	128	190	251		512	661	810	
Frequency (MHz)	824.2	836.6	848.8		1850.2	1880	1909.8	
GSM	23.54	23.46	23.46	24.5	21.16	21.00	21.03	21.5
GPRS (1 slot)	23.24	23.27	23.37	23.5	21.16	20.94	21.01	21.5
GPRS (2 slots)	25.12	24.95	25.07	25.5	23.58	23.37	23.08	24.0
GPRS (3 slots)	24.57	24.63	24.73	25.0	23.77	23.43	23.15	24.0
GPRS (4 slots)	24.66	24.76	24.72	25.0	24.22	23.69	24.29	24.5

Note: The source-based time-averaged power is linearly scaled the maximum burst averaged power based on time slots. The calculated method are shown as below:

Source based time-average power = Burst averaged power - Duty cycle factor in dB

Duty cycle factor = 9 dB for 1 Tx slot, 6 dB for 2 Tx slots, 4.25 dB for 3 Tx slots, 3 dB for 4 Tx slots

Remark:

1. For Front of face SAR testing, GSM should be evaluated, therefore the EUT was set in GSM for GSM850 and GSM1900 due to its highest source-based time-average power.
2. For Body SAR testing, GPRS should be evaluated, therefore the EUT was set in GPRS (2Tx slots) for GSM850 and GPRS (4Tx slots) for GSM1900 due to its highest source-based time-average power.
3. Per KDB 447498 D01 v06, the maximum output power channel is used for SAR testing and for further SAR test reduction.
4. The DUT do not support DTM function.

Bluetooth - Maximum Average Power					
Test Mode	Data Rate	Channel	Frequency (MHz)	Average Power (dBm)	Tune-up power (dBm)
BLE	1Mbps	CH 00	2402	-1.218	0
		CH 19	2440	-0.679	0
		CH 39	2480	-0.276	0

Remark:

Bluetooth maximum output power is -0.276dBm, and Tune-Up output power is 0dBm. Per KDB 447498 D01 v06, 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,16 where

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation¹⁷
- The result is rounded to one decimal place for comparison

Tune-Up Power (dBm)	Max. Power (mW)	Distance (mm)	Frequency (GHz)	Result	Limit
0	1.0	5	2.480	0.315	3

The exclusion thresholds is $0.315 < 3$, therefore, the RF exposure evaluation is not required.

9.2 Test Results for Standalone SAR Test

Body SAR

GSM850 – Body SAR Test (Gap: 5mm)									
Plot No.	Mode	Test Position Body	Frequency		Output Power (dBm)	Rated Limit (dBm)	Scaling Factor	SAR _{1g} (W/kg)	Scaled SAR _{1g} (W/kg)
			CH.	MHz					
1.	GPRS_2TX	Back Side	128	824.2	31.12	31.5	1.091	1.099	1.199
2.	GPRS_2TX	Back Side	190	836.6	30.95	31.5	1.135	1.012	1.149
3.	GPRS_2TX	Back Side	251	848.8	31.07	31.5	1.104	0.766	0.846
4.	GPRS_2TX	Front Side	128	824.2	31.12	31.5	1.091	1.204	1.314
5.	GPRS_2TX	Front Side	190	836.6	30.95	31.5	1.135	1.231	1.397
6.	GPRS_2TX	Front Side	251	848.8	31.07	31.5	1.104	1.023	1.129
7.	GPRS_2TX	Right side	128	824.2	31.12	31.5	1.091	1.306	1.425
8.	GPRS_2TX	Right side	190	836.6	30.95	31.5	1.135	0.938	1.065
9.	GPRS_2TX	Right side	251	848.8	31.07	31.5	1.104	0.794	0.877
10.	GPRS_2TX	Left side	128	824.2	31.12	31.5	1.091	0.728	0.795
11.	GPRS_2TX	Top Side	128	824.2	31.12	31.5	1.091	0.267	0.291

GSM1900 – Body SAR Test (Gap: 5mm)									
Plot No.	Mode	Test Position Body	Frequency		Output Power (dBm)	Rated Limit (dBm)	Scaling Factor	SAR _{1g} (W/kg)	Scaled SAR _{1g} (W/kg)
			CH.	MHz					
12.	GPRS_4TX	Back Side	810	1909.8	27.29	27.5	1.050	0.442	0.464
13.	GPRS_4TX	Front Side	810	1909.8	27.29	27.5	1.050	0.286	0.300
14.	GPRS_4TX	Right side	810	1909.8	27.29	27.5	1.050	0.235	0.247
15.	GPRS_4TX	Left side	810	1909.8	27.29	27.5	1.050	0.070	0.073
16.	GPRS_4TX	Top Side	810	1909.8	27.29	27.5	1.050	0.409	0.429

Remark: Per KDB447498 D01 v06, if the highest output channel SAR for each exposure position ≤ 0.8 W/kg other channels SAR tests are not necessary.

9.3 Simultaneous Multi-band Transmission SAR Analysis

List of Mode for Simultaneous Multi-band Transmission

No.	Configurations	Front-of-face SAR	Body SAR
1	GSM(Voice/Data) + Bluetooth (Data)	Yes	Yes

Remark:

1. According to the KDB 447498 D01 v06, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm) 2 ·[\sqrt{f} (GHz)/x] W/kg for test separation distances \leq 50 mm;

where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.

For simultaneous transmission analysis, Bluetooth SAR is estimated per KDB 447498 D01 v06 as below:

Bluetooth:

Tune-Up Power (dBm)	Max. Power (mW)	Distance (mm)	Frequency (GHz)	X	SAR(1g) 5mm	SAR(1g) 10mm
0	1	5/10	2.480	7.5	0.042	0.021

2. The maximum SAR summation is calculated based on the same configuration and test position.

WWAN and Bluetooth
Body SAR

Position	WWAN		Bluetooth	Summed SAR (W/kg)
	Band	Scaled SAR (W/kg)	Scaled SAR (W/kg)	
Back	GSM850	1.199	0.021	1.220
Front	GSM850	1.397	0.021	1.418
Right side	GSM850	1.425	0.021	1.446
Left side	GSM850	0.795	0.021	0.816
Top side	GSM850	0.291	0.021	0.312
Bottom side	GSM850	--	0.021	0.021
Back	GSM1900	0.464	0.021	0.485
Front	GSM1900	0.300	0.021	0.321
Right side	GSM1900	0.247	0.021	0.268
Left side	GSM1900	0.073	0.021	0.094
Top side	GSM1900	0.429	0.021	0.450
Bottom side	GSM1900	--	0.021	0.021

10. Measurement Uncertainty

10.1 Uncertainty for EUT SAR Test

a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol (+- %)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System									
Probe calibration	E.2.1	7.0	N	1	1	1	7.00	7.00	∞
Axial Isotropy	E.2.2	2.5	R	$\sqrt{3}$	$(1_{Cp})^{1/2}$	$(1_{Cp})^{1/2}$	1.02	1.02	∞
Hemispherical Isotropy	E.2.2	4.0	R	$\sqrt{3}$	$(Cp)^{1/2}$	$(Cp)^{1/2}$	1.63	1.63	∞
Boundary effect	E.2.3	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	E.2.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞
System detection limits	E.2.5	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Readout Electronics	E.2.6	0.02	N	1	1	1	0.02	0.02	∞
Reponse Time	E.2.7	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Integration Time	E.2.8	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
RF ambient Conditions – Noise	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	E.6.2	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Probe positioning with respect to Phantom Shell	E.6.3	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	∞
Extrapolation, interpolation and integration Algorithms for Max. SAR Evaluation	E.5	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞
Test Sample Related									
Test sample positioning	E.4.2	0.03	N	1	1	1	0.03	0.03	N-1
Device Holder Uncertainty	E.4.1	5.00	N	1	1	1	5.00	5.00	
Output power Variation - SAR drift measurement	E.2.9	12.02	R	$\sqrt{3}$	1	1	6.94	6.94	∞
SAR scaling	E6.5	0.0	R	$\sqrt{3}$	1	1	0.0	0.0	∞
Phantom and Tissue Parameters									
Phantom Uncertainty (Shape and thickness tolerances)	E.3.1	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E3.2	1.9	R	$\sqrt{3}$	1	0.84	1.10	0.90	∞

Liquid conductivity - deviation from target value	E.3.2	5.00	R	$\sqrt{3}$	0.64	0.43	1.85	1.24	∞
Liquid conductivity - measurement uncertainty	E.3.3	5.00	N	1	0.64	0.43	3.20	2.15	∞
Liquid permittivity - deviation from target value	E.3.2	0.37	R	$\sqrt{3}$	0.6	0.49	0.13	0.10	∞
Liquid permittivity - measurement uncertainty	E.3.3	10.00	N	1	0.6	0.49	6.00	4.90	∞
Combined Standard Uncertainty			RSS				12.98	12.53	
Expanded Uncertainty (95% Confidence interval)			K=2				25.32	24.43	

10.2 Uncertainty for System Performance Check

a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol (+-%)	Prob. Dist.	Div.	Ci (1g)	Ci (10g)	1g Ui (+-%)	10g Ui (+-%)	Vi
Measurement System									
Probe calibration	E.2.1	7.0	N	1	1	1	7.00	7.00	∞
Axial Isotropy	E.2.2	2.5	R	$\sqrt{3}$	$(1_{-Cp})^{1/2}$	$(1_{-Cp})^{1/2}$	1.02	1.02	∞
Hemispherical Isotropy	E.2.2	4.0	R	$\sqrt{3}$	$(Cp)^{1/2}$	$(Cp)^{1/2}$	1.63	1.63	∞
Boundary effect	E.2.3	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Linearity	E.2.4	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞
System detection limits	E.2.5	1.0	R	$\sqrt{3}$	1	1	0.58	0.58	∞
Modulation response	E.2.5	0	R	$\sqrt{3}$	0	0	0.0	0.0	∞
Readout Electronics	E.2.6	0.02	N	1	1	1	0.02	0.02	∞
Reponse Time	E.2.7	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Integration Time	E.2.8	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
RF ambient Conditions – Noise	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
RF ambient Conditions - Reflections	E.6.1	3.0	R	$\sqrt{3}$	1	1	1.73	1.73	∞
Probe positioner Mechanical Tolerance	E.6.2	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	∞
Probe positioning with respect to Phantom Shell	E.6.3	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	∞
Extrapolation, interpolation and	E.5.2	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	∞

integration Algorithms for Max. SAR Evaluation									
Dipole									
Dipole axis to liquid Distance	8,E.4.2	1.00	N	$\sqrt{3}$	1	1	0.58	0.58	N-1
Input power and SAR drift measurement	8,6.6.2	12.02	R	$\sqrt{3}$	1	1	6.94	6.94	∞
Deviation of experimental dipole from numerical dipole	E.6.4	5.5	R	$\sqrt{3}$	1	1	3.20	3.20	∞
Phantom and Tissue Parameters									
Phantom Uncertainty (Shape and thickness tolerances)	E.3.1	0.05	R	$\sqrt{3}$	1	1	0.03	0.03	∞
Uncertainty in SAR correction for deviations in permittivity and conductivity	E3.2	2.0	R	$\sqrt{3}$	1	0.84	1.10	1.10	∞
Liquid conductivity - deviation from target value	E.3.2	5.00	R	$\sqrt{3}$	0.64	0.43	1.85	1.24	
Liquid conductivity - measurement uncertainty	E.3.3	5.00	N	1	0.64	0.43	3.20	2.15	
Liquid permittivity - deviation from target value	E.3.2	0.37	R	$\sqrt{3}$	0.6	0.49	0.13	0.10	
Liquid permittivity - measurement uncertainty	E.3.3	10.00	N	1	0.6	0.49	6.00	4.90	M
Combined Standard Uncertainty			RSS				12.00	11.50	
Expanded Uncertainty (95% Confidence interval)			K=2				23.39	22.43	

Annex A. Plots of System Performance Check

MEASUREMENT 1

For Head Liquid

Type: Validation measurement (Fast, 75.00 %)

Date of measurement: 06/24/2019

Measurement duration: 7 minutes 21 seconds

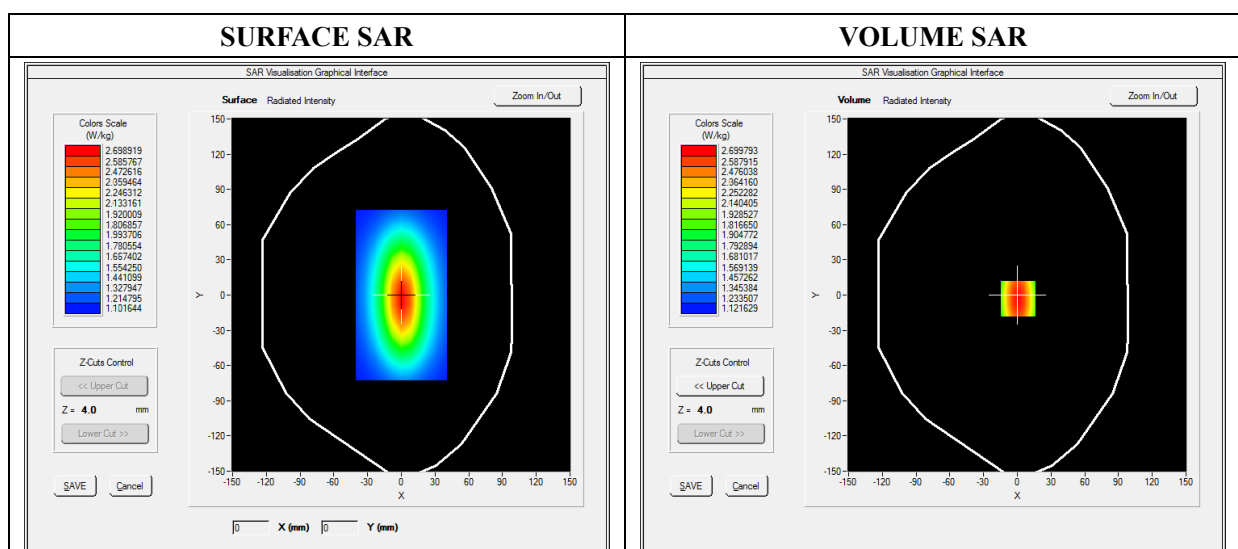
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 6.93; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW835
Signal	Duty Cycle 1:1

B. SAR Measurement Results

Frequency (MHz)	835.000000
Relative Permittivity (real part)	41.431392
Conductivity (S/m)	0.890937
Power Variation (%)	0.738437
Ambient Temperature	21.1
Liquid Temperature	21.3

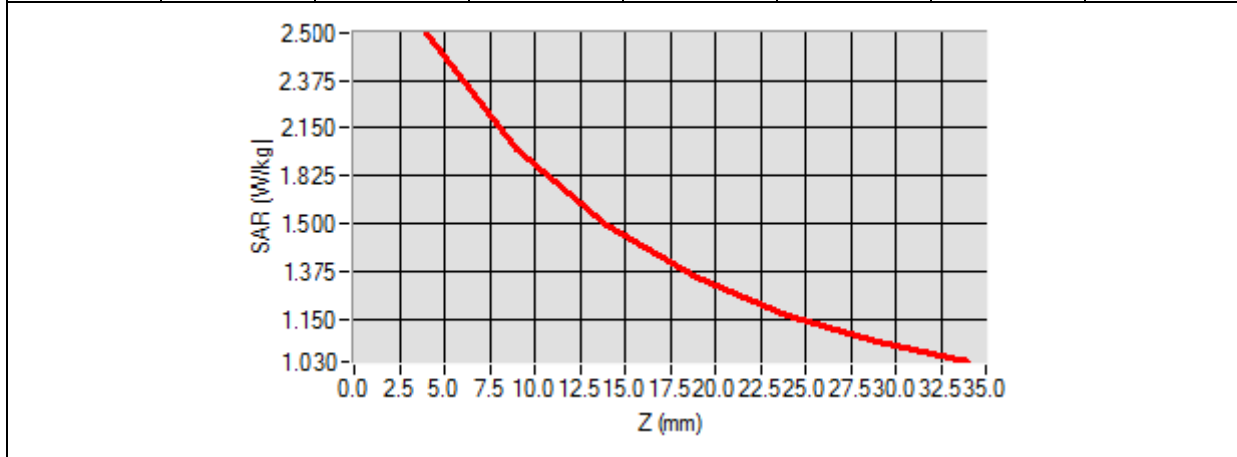


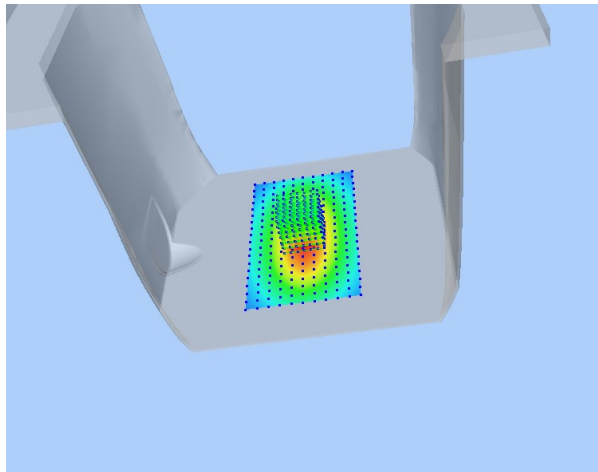
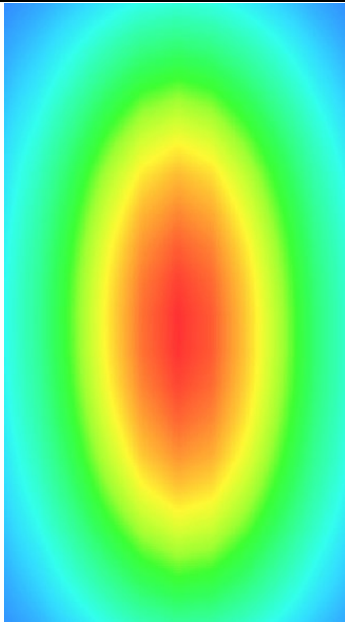
Maximum location: X=0.00, Y=0.00

SAR 10g (W/Kg)	1.137221
SAR 1g (W/Kg)	2.410943

Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.0000	2.4897	1.8968	1.4816	1.3553	1.1137	1.0543



3D screen shot	Hot spot position
	

MEASUREMENT 2

For Head Liquid

Type: Validation measurement (Fast, 75.00 %)

Date of measurement: 06/25/2019

Measurement duration: 12 minutes 21 seconds

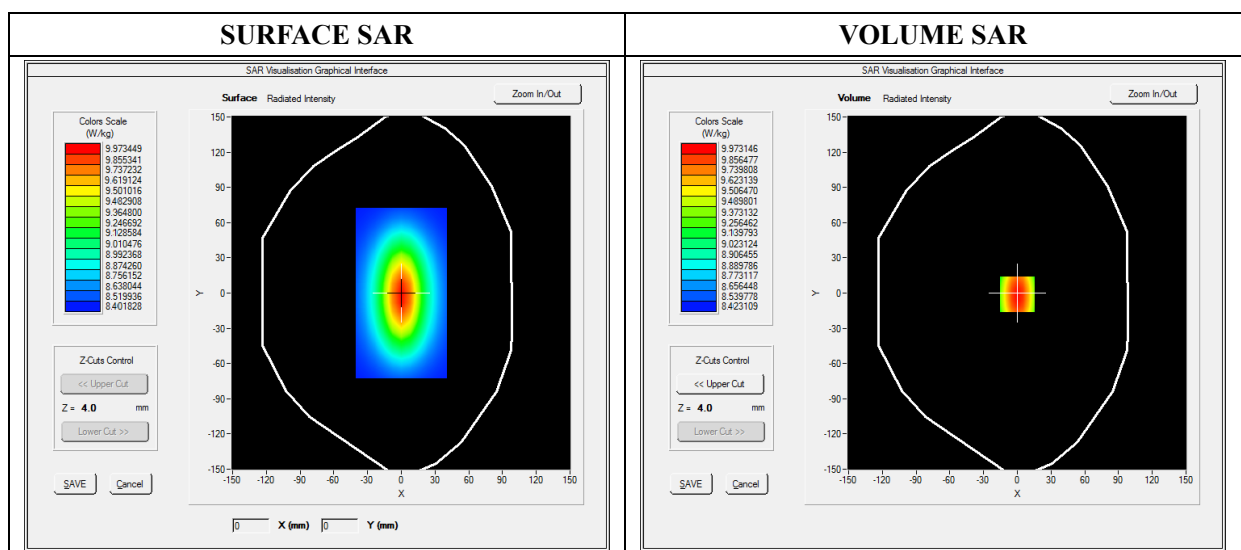
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 6.35; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW1900
Signal	Duty Cycle 1:1

B. SAR Measurement Results

Frequency (MHz)	1900.000000
Relative Permittivity (real part)	39.521049
Conductivity (S/m)	1.372412
Power Variation (%)	0.822540
Ambient Temperature	21.1
Liquid Temperature	21.3

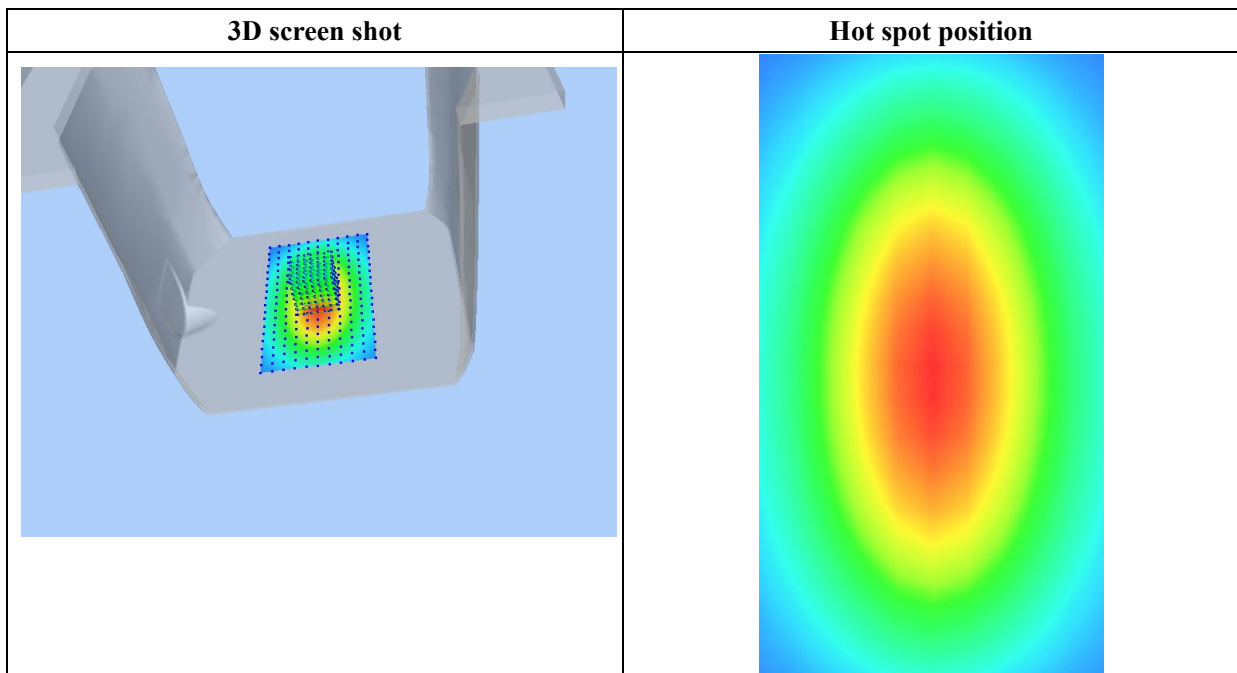
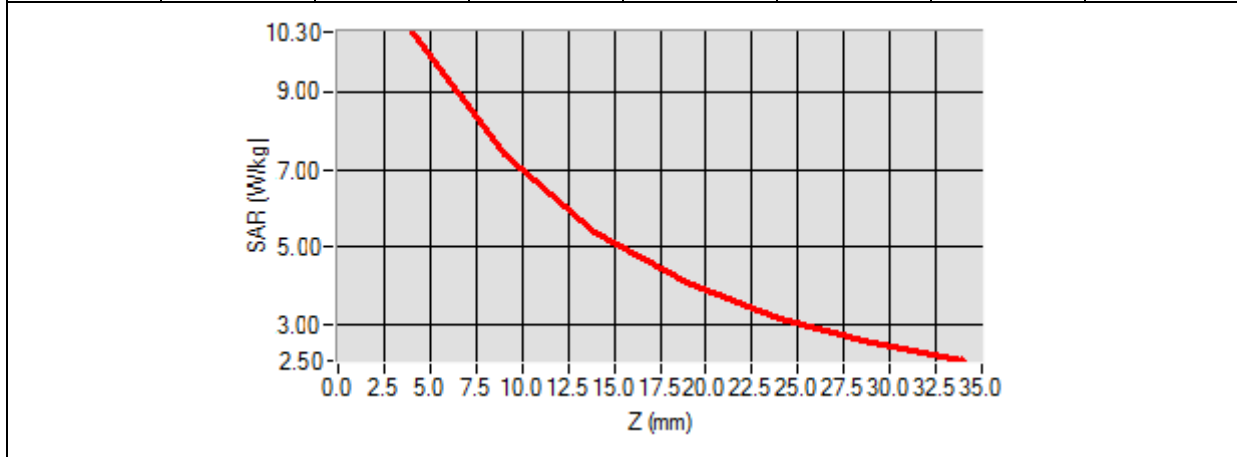


Maximum location: X=0.00, Y=0.00

SAR 10g (W/Kg)	7.173892
SAR 1g (W/Kg)	9.980521

Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.0000	10.2349	6.8398	5.0121	4.1196	3.0534	2.8399



MEASUREMENT 3

For Body Liquid

Type: Validation measurement (Fast, 75.00 %)

Date of measurement: 06/24/2019

Measurement duration: 12 minutes 21 seconds

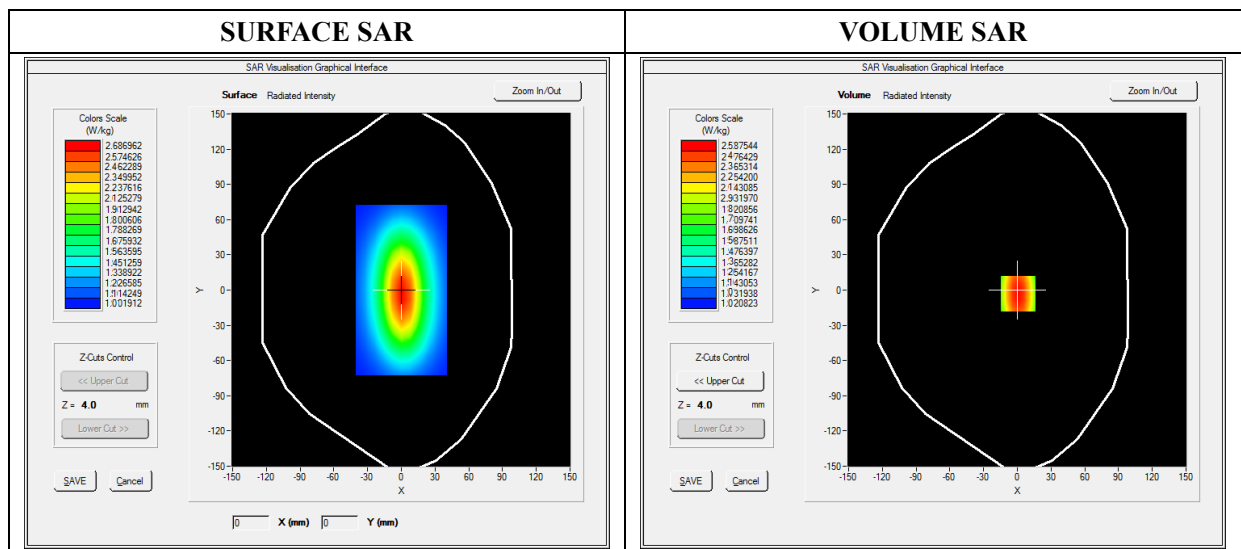
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 7.13; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW835
Signal	Duty Cycle 1:1

B. SAR Measurement Results

Frequency (MHz)	835.000000
Relative Permittivity (real part)	54.990182
Conductivity (S/m)	0.962563
Power Variation (%)	0.851711
Ambient Temperature	21.1
Liquid Temperature	21.3

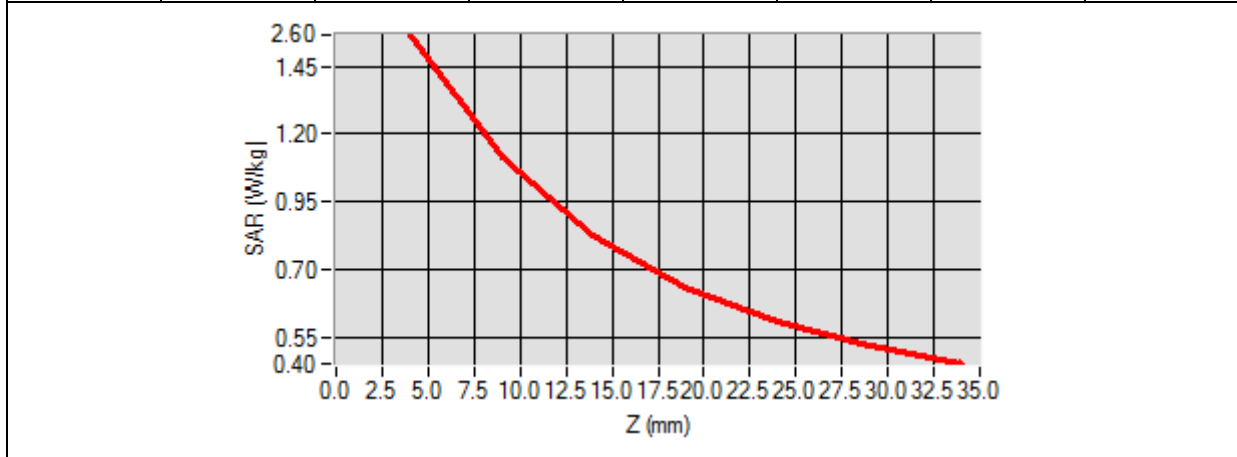


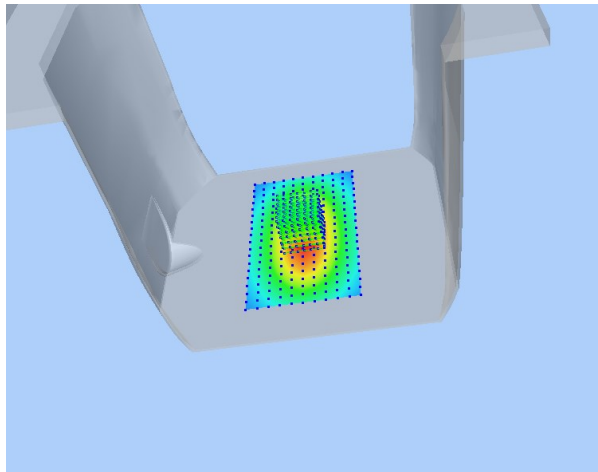
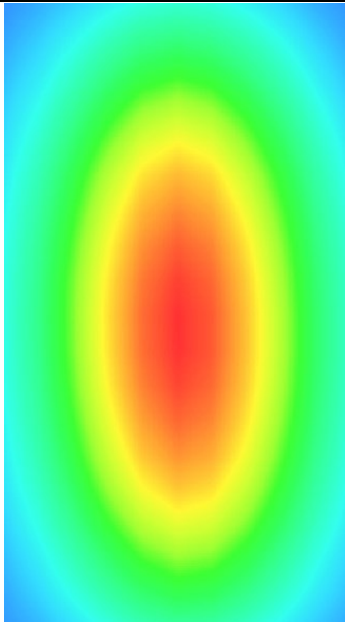
Maximum location: X=0.00, Y=0.00

SAR 10g (W/Kg)	1.428956
SAR 1g (W/Kg)	2.383671

Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.0000	2.5798	1.1343	0.8799	0.5964	0.5032	0.5121



3D screen shot	Hot spot position
	

MEASUREMENT 4

For Body Liquid

Type: Validation measurement (Fast, 75.00 %)

Date of measurement: 06/25/2019

Measurement duration: 12 minutes 21 seconds

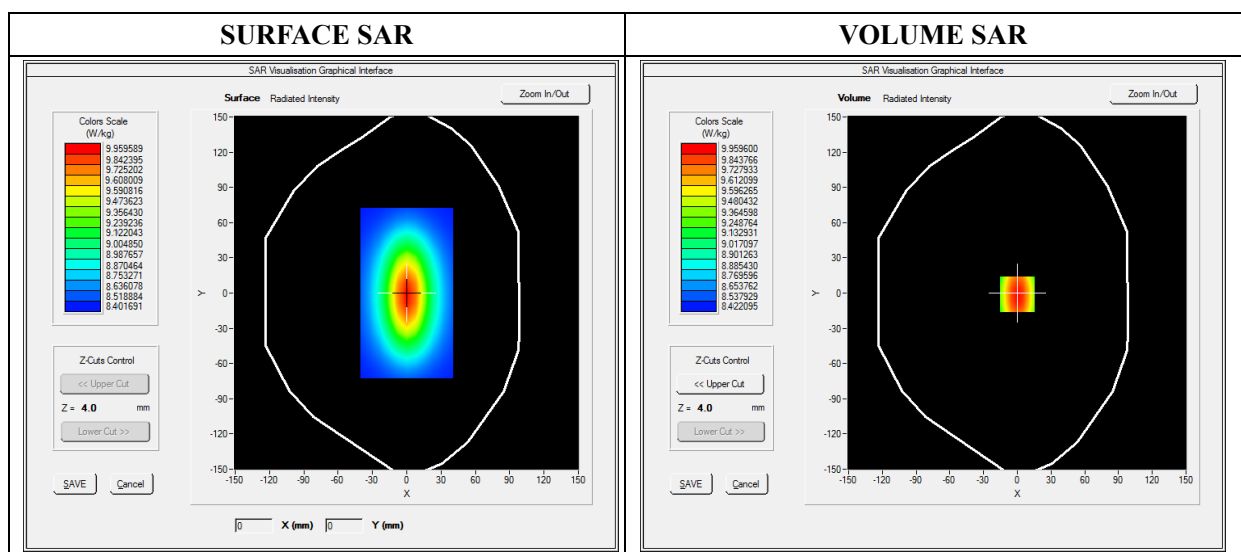
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 6.55; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW1900
Signal	Duty Cycle 1:1

B. SAR Measurement Results

Frequency (MHz)	1900.000000
Relative Permittivity (real part)	52.382176
Conductivity (S/m)	1.461366
Power Variation (%)	0.743921
Ambient Temperature	21.1
Liquid Temperature	21.3

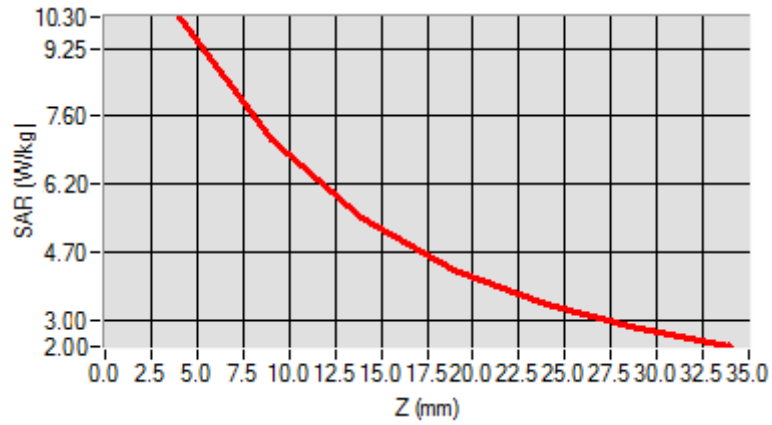


Maximum location: X=0.00, Y=0.00

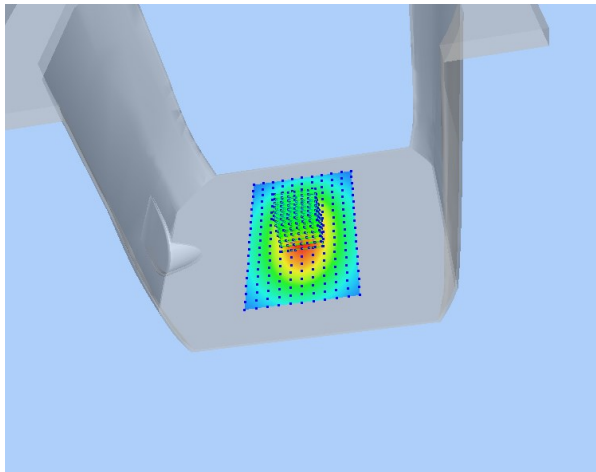
SAR 10g (W/Kg)	5.134651
SAR 1g (W/Kg)	9.850833

Z Axis Scan

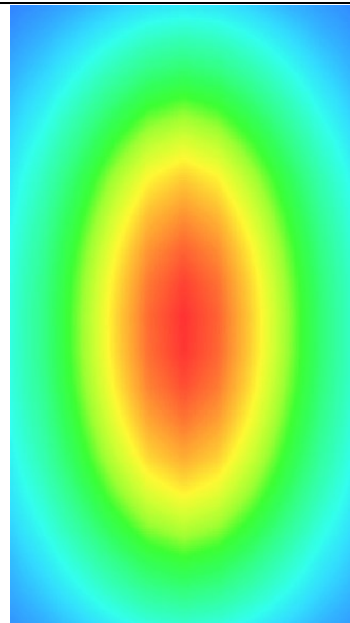
Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR (W/Kg)	0.0000	10.2045	6.4319	4.9010	4.5319	3.1204	2.5042



3D screen shot



Hot spot position



Annex B. Plots of SAR Measurement

<u>BAND</u>	<u>PARAMETERS</u>
GPRS850_2TX	<u>Measurement 7:</u> Flat Plane with Right device position on Low Channel in GPRS mode
GPRS1900_4TX	<u>Measurement 12:</u> Flat Plane with Back device position on High Channel in GPRS mode

Remark: SAR plot is showed the highest measured SAR in each exposure configuration, wireless mode and frequency band combination.

MEASUREMENT 7

Type: Phone measurement (Complete)

Date of measurement: 06/24/2019

Measurement duration: 12 minutes 3 seconds

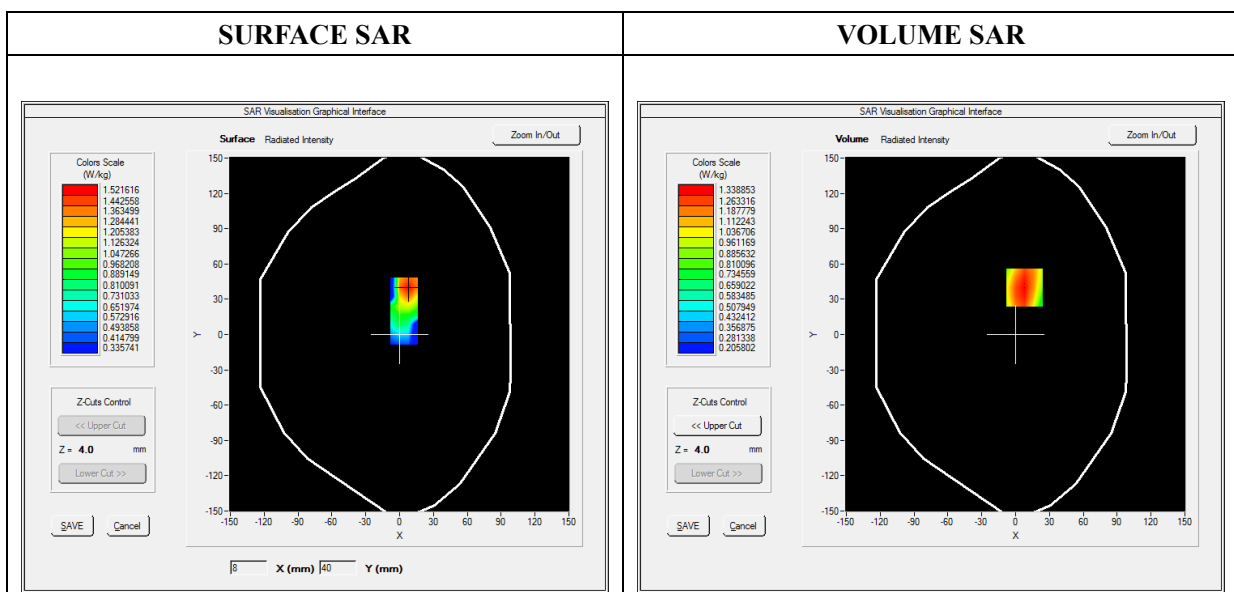
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 7.13; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Flat plane
Device Position	Right
Band	GPRS850_2TX
Channels	Low
Signal	Duty Cycle: 1:4

B. SAR Measurement Results

Frequency (MHz)	824.200000
Relative Permittivity (real part)	54.990182
Conductivity (S/m)	0.962563
Power Variation (%)	0.867221
Ambient Temperature	21.1
Liquid Temperature	21.3

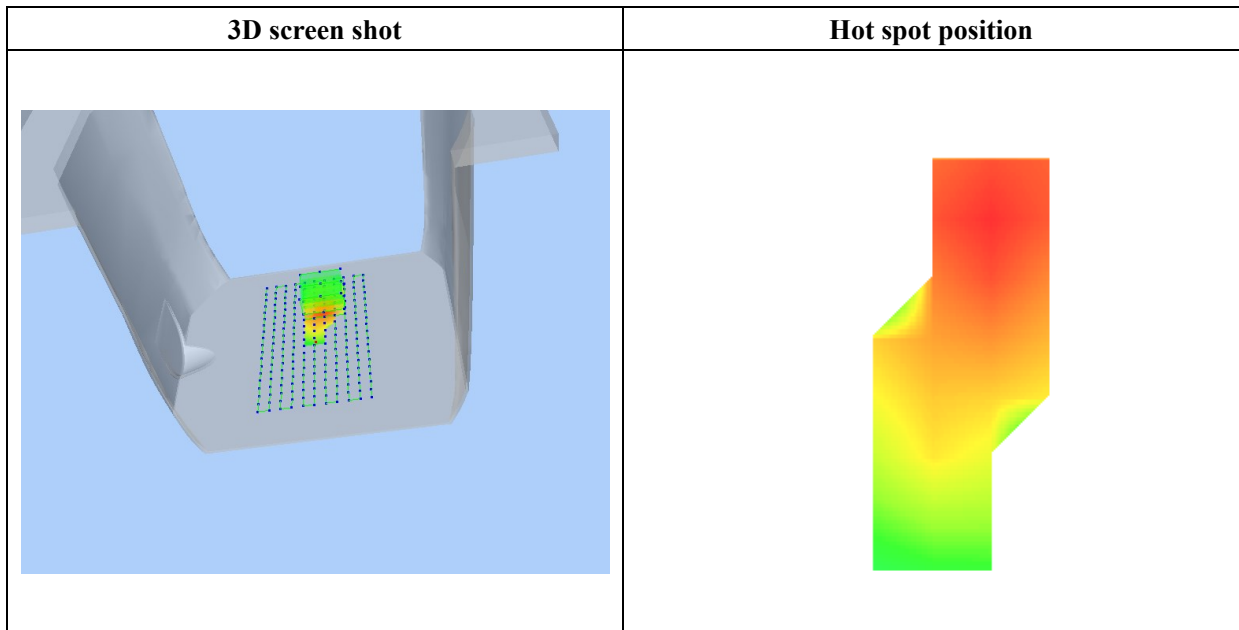
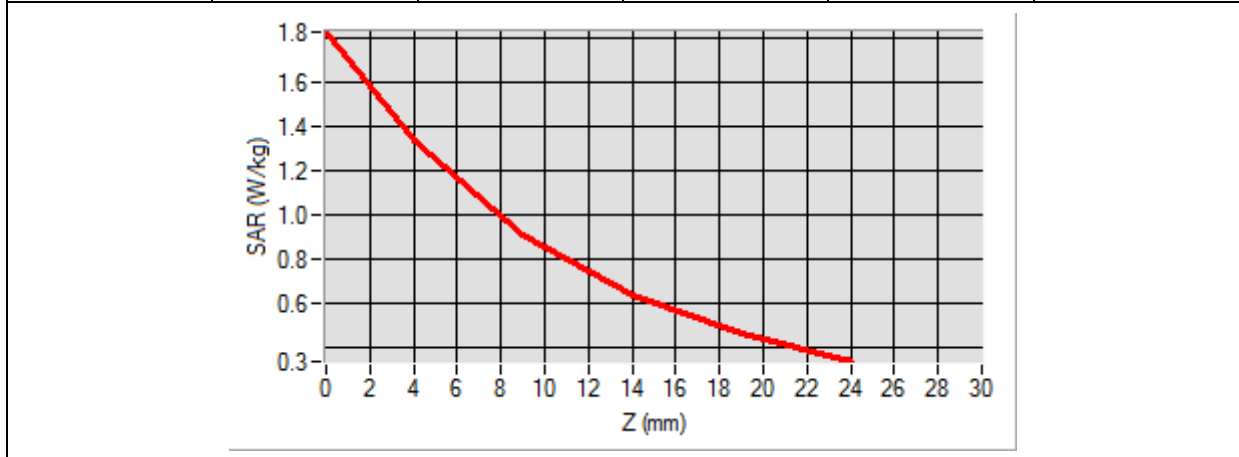


Maximum location: X=8.00, Y=40.00

SAR Peak: 1.90 W/kg

SAR 10g (W/Kg)	0.876317
SAR 1g (W/Kg)	1.305652

Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	1.8283	1.3389	0.9095	0.6332	0.4581



MEASUREMENT 12

Type: Phone measurement (Complete)

Date of measurement: 06/25/2019

Measurement duration: 12 minutes 3 seconds

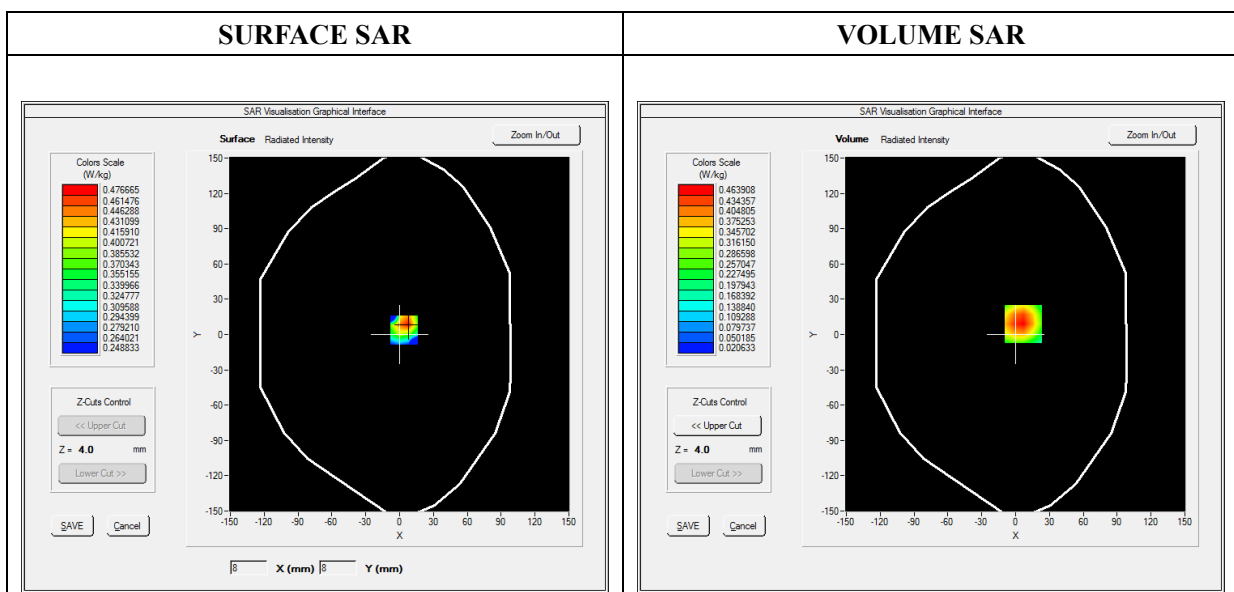
E-field Probe: SSE5 - SN 09/13 EP168; ConvF: 6.55; Calibrated: 05/22/2019

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Flat plane
Device Position	Back side
Band	GPRS1900_4TX
Channels	High
Signal	Duty Cycle: 1:2

B. SAR Measurement Results

Frequency (MHz)	1909.800000
Relative Permittivity (real part)	52.382176
Conductivity (S/m)	1.461366
Power Variation (%)	0.903822
Ambient Temperature	21.1
Liquid Temperature	21.3

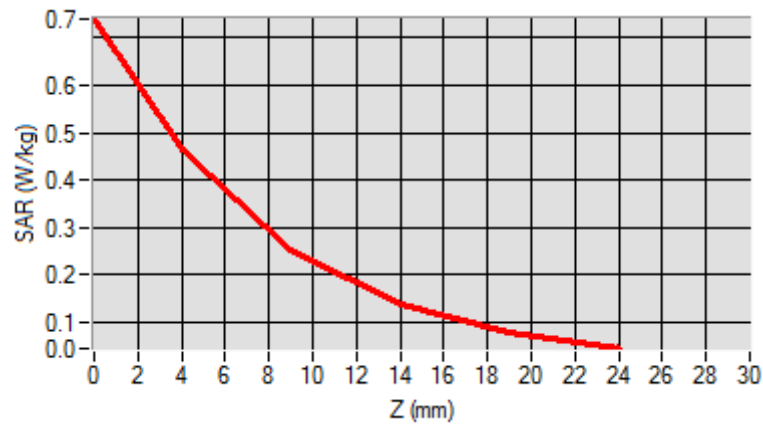


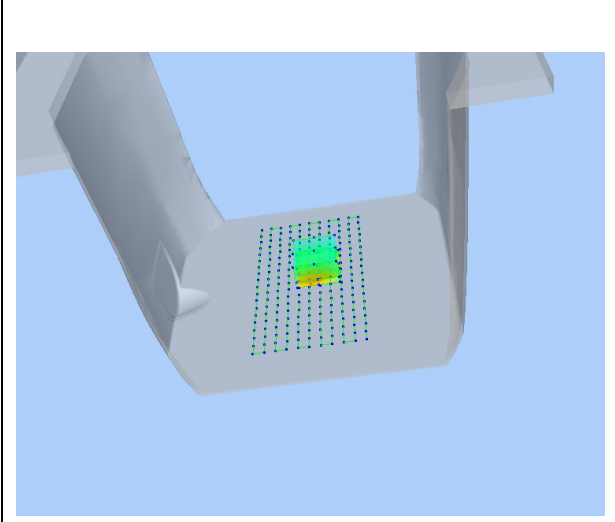

Maximum location: X=7.00, Y=9.00

SAR Peak: 0.75 W/kg

SAR 10g (W/Kg)	0.246350
SAR 1g (W/Kg)	0.442389

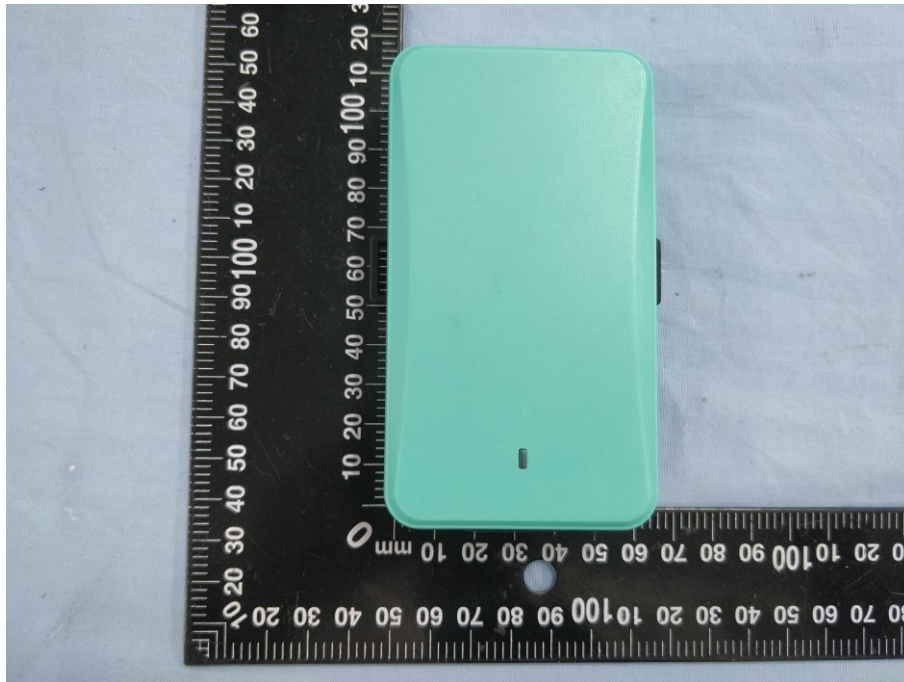
Z (mm)	0.00	4.00	9.00	14.00	19.00
SAR (W/Kg)	0.7394	0.4639	0.2516	0.1373	0.0791



<p>3D screen shot</p>	<p>Hot spot position</p>
	

Annex C. EUT Photos

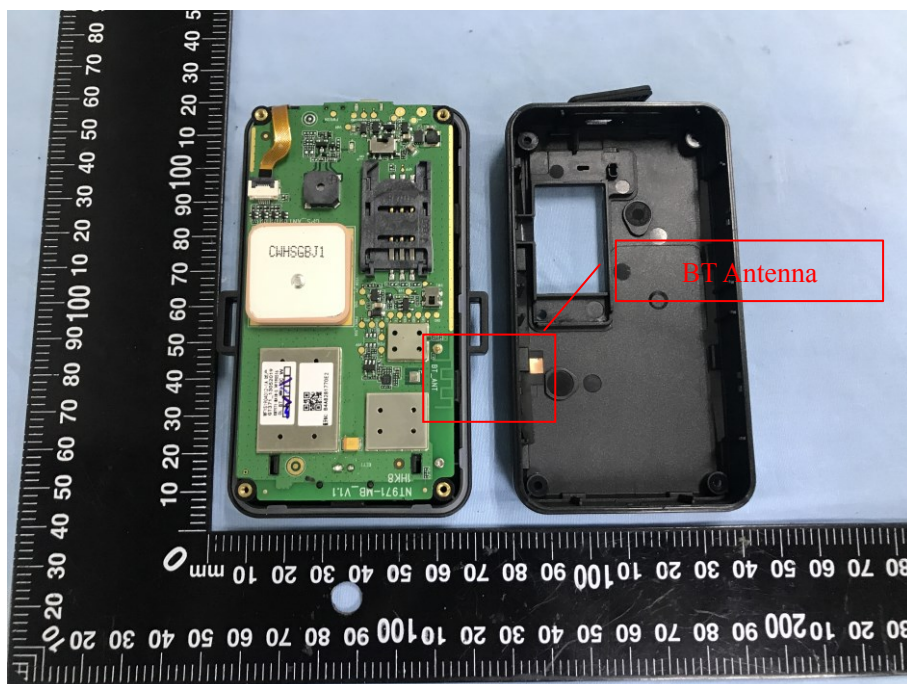
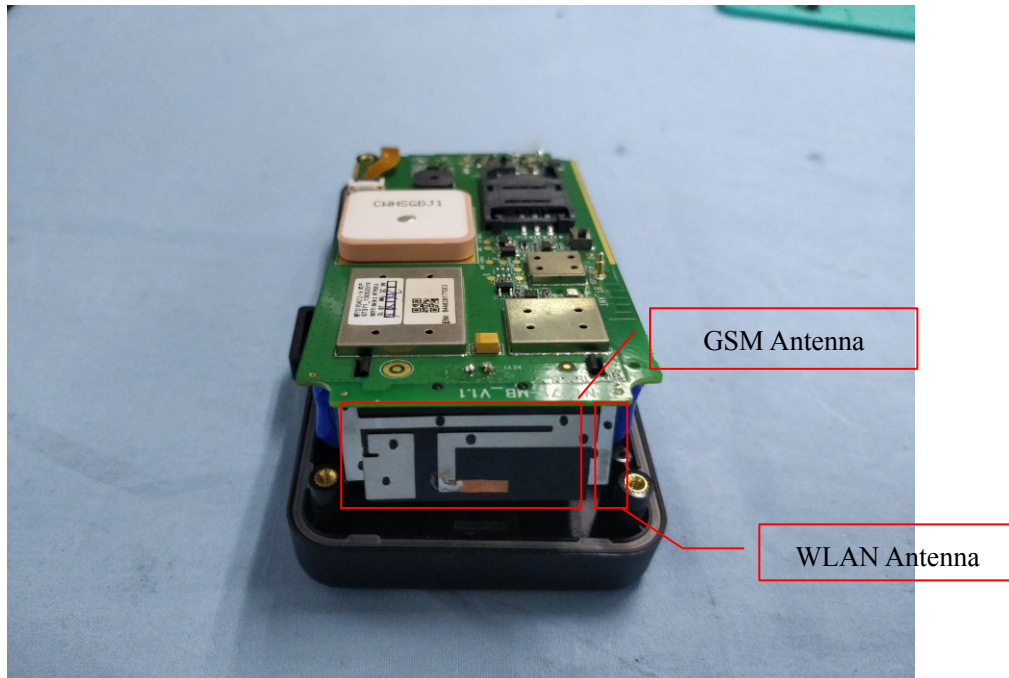
EUT View Front



EUT View Back



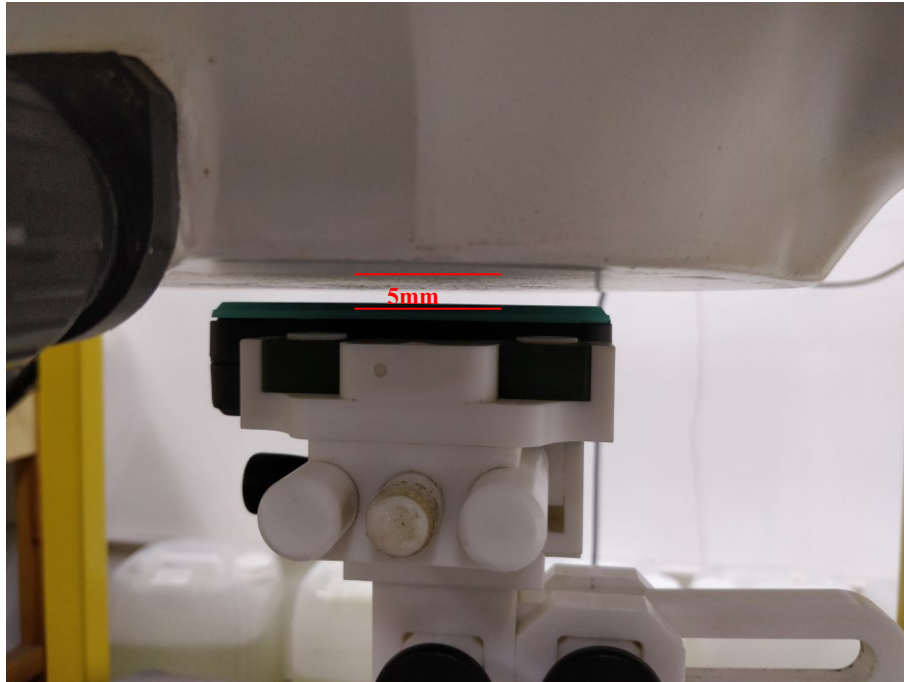
Antenna View



Annex D. Test Setup Photos

Body mode Exposure Conditions

Body Front



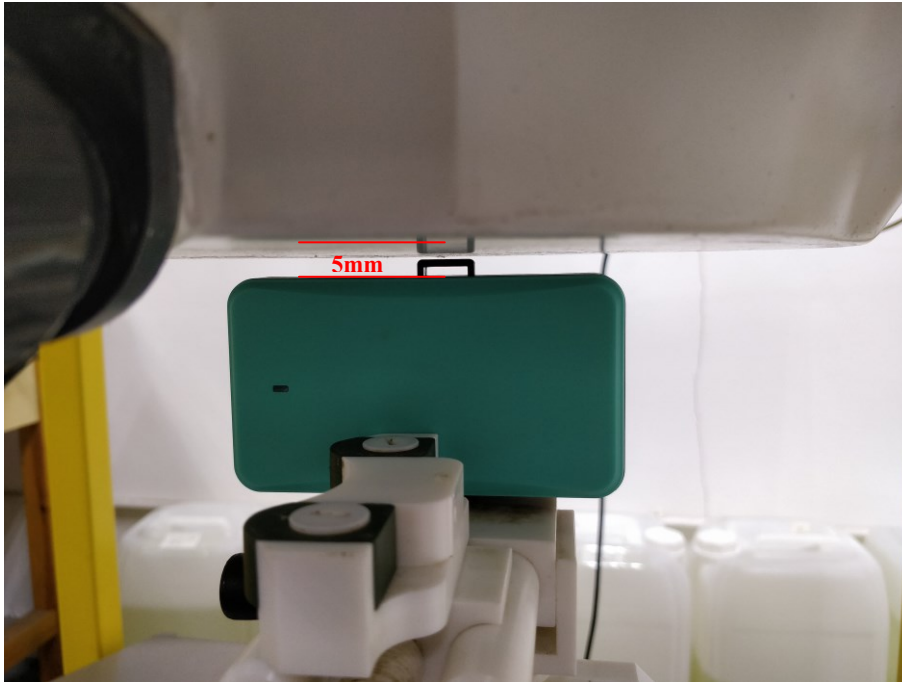
Body Back



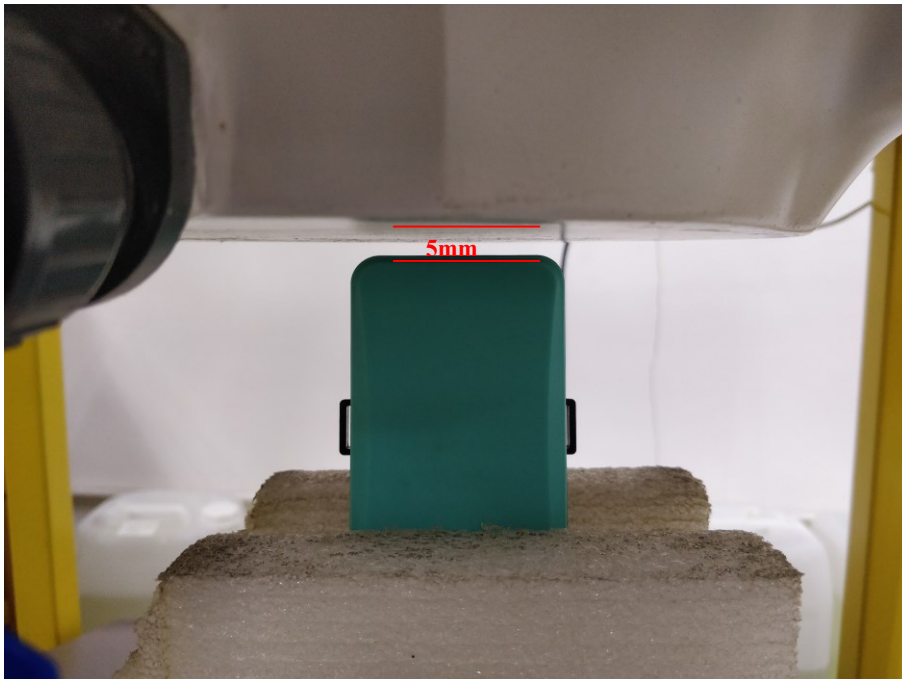
Body Right



Body Left



Body Top



Annex E. Calibration Certificate

Please refer to the Exhibit for the Calibration Certificate

******* END OF REPORT *******