

FCC SAR Test Report

APPLICANT : Shenzhen Tinno Mobile Technology Corp.
EQUIPMENT : Watch
MODEL NAME : UW538AA
FCC ID : XD6UW538AA
STANDARD : FCC 47 CFR Part 2 (2.1093)

We, Sporton International Inc. (Shenzhen), would like to declare that the tested sample has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of Sporton International Inc. (Shenzhen), the test report shall not be reproduced except in full.



Approved by: Si Zhang

Sporton International Inc. (Shenzhen)

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People's Republic of China



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Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA431213	Rev. 01	Initial issue of report	Jun. 17, 2024

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Shenzhen Tinnno Mobile Technology Corp., Watch, UW538AA**, are as follows.

Next to Mouth 1g SAR

Equipment Class	Frequency Band	Highest SAR Summary		
		Next to Mouth SAR (Separation 10mm)	Highest Simultaneous Transmission 1g SAR (W/kg)	
Licensed	LTE	Band 12	0.27	1.47
		Band 5	0.64	
		Band 66/Band 4	1.07	
		Band 2	0.94	
DTS	WLAN	2.4GHz WLAN	0.34	1.47
DSS	Bluetooth	2.4GHz Bluetooth	<0.10	1.47

Extremity 10g SAR

Equipment Class	Frequency Band	Highest SAR Summary		
		Extremity SAR (Separation 0mm)	Highest Simultaneous Transmission 10g SAR (W/kg)	
Licensed	LTE	Band 12	0.48	2.56
		Band 5	0.74	
		Band 66/Band 4	1.77	
		Band 2	1.45	
DTS	WLAN	2.4GHz WLAN	0.66	2.56
DSS	Bluetooth	2.4GHz Bluetooth	0.14	2.56
Date of Testing:		2024/5/17~ 2024/6/11		

Remark:

- This device supports LTE B4 and B66. Since the supported frequency span for LTE B4 falls completely within the supports frequency span for LTE B66, both LTE bands have the same target power, and both LTE bands share the same transmission path; therefore, SAR was only assessed for LTE B66.

Declaration of Conformity:

The test results with all measurement uncertainty excluded are 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.

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled 1g SAR exposure limits (1.6 W/kg) and Extremity 10g SAR (4.0 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.



2. Administration Data

Sporton International Inc. (Shenzhen) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.01.

Testing Laboratory			
Test Firm	Sporton International Inc. (Shenzhen)		
Test Site Location	1/F, 2/F, Bldg 5, Shiling Industrial Zone, Xinwei Village, Xili, Nanshan, Shenzhen, 518055 People's Republic of China TEL: +86-755-86379589 FAX: +86-755-86379595		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR02-SZ	CN1256	421272

Applicant	
Company Name	Shenzhen Tinno Mobile Technology Corp.
Address	27-001, South Side of Tianlong Mobile Headquarters Building, Tongfa South Road, Xili Community, Xili Street, Nanshan District, Shenzhen ,PRC

Manufacturer	
Company Name	Shenzhen Tinno Mobile Technology Corp.
Address	27-001, South Side of Tianlong Mobile Headquarters Building, Tongfa South Road, Xili Community, Xili Street, Nanshan District, Shenzhen ,PRC

3. Guidance Applied

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

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 447498 D01 General RF Exposure Guidance v06
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 941225 D05 SAR for LTE Devices v02r05



4. Equipment Under Test (EUT) Information

4.1 General Information

Product Feature & Specification	
Equipment Name	Watch
Model Name	UW538AA
FCC ID	XD6UW538AA
IMEI Code	Sample 1: 864796070002728 Sample 2: 864796070013196
Wireless Technology and Frequency Range	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 66: 1710 MHz ~ 1780 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	LTE: QPSK WLAN 2.4GHz 802.11b/g/n HT20 Bluetooth BR/EDR/LE
HW Version	V1.0
SW Version	UW538AAV01.08.10
EUT Stage	Identical Prototype
Remark:	
<ol style="list-style-type: none"> 1. This device supports voice function. 2. This device supports VoIP in LTE (e.g. for 3rd-party VoIP), LTE supports VoLTE operation. 3. There are two samples, the different between them is sample materials: sample 1 is 1st source materials, Sample 2 is 2nd source materials. According to the differences, sample 1 was chosen to perform full SAR testing and sample 2 verified the worst case of sample 1. 	

4.2 General LTE SAR Test and Reporting Considerations

Summarized necessary items addressed in KDB 941225 D05 v02r05																																																															
FCC ID	XD6UW538AA																																																														
Equipment Name	Watch																																																														
Operating Frequency Range of each LTE transmission band	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 66: 1710 MHz ~ 1780 MHz																																																														
Channel Bandwidth	LTE Band 2: 1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 4: 1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 5: 1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 12: 1.4MHz, 3MHz, 5MHz, 10MHz LTE Band 66: 1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz																																																														
uplink modulations used	QPSK																																																														
LTE Voice / Data requirements	Voice and Data																																																														
LTE Release Version	R9, Cat1																																																														
LTE CA supported	Not supported																																																														
LTE MPR permanently built-in by design	<p style="text-align: center;">Table 6.2.3-1: Maximum Power Reduction (MPR) for Power Class 1, 2 and 3</p> <table border="1"> <thead> <tr> <th rowspan="2">Modulation</th> <th colspan="6">Channel bandwidth / Transmission bandwidth (N_{RB})</th> <th rowspan="2">MPR (dB)</th> </tr> <tr> <th>1.4 MHz</th> <th>3.0 MHz</th> <th>5 MHz</th> <th>10 MHz</th> <th>15 MHz</th> <th>20 MHz</th> </tr> </thead> <tbody> <tr> <td>QPSK</td> <td>> 5</td> <td>> 4</td> <td>> 8</td> <td>> 12</td> <td>> 16</td> <td>> 18</td> <td>≤ 1</td> </tr> <tr> <td>16 QAM</td> <td>≤ 5</td> <td>≤ 4</td> <td>≤ 8</td> <td>≤ 12</td> <td>≤ 16</td> <td>≤ 18</td> <td>≤ 1</td> </tr> <tr> <td>64 QAM</td> <td>> 5</td> <td>> 4</td> <td>> 8</td> <td>> 12</td> <td>> 16</td> <td>> 18</td> <td>≤ 2</td> </tr> <tr> <td>256 QAM</td> <td>≤ 5</td> <td>≤ 4</td> <td>≤ 8</td> <td>≤ 12</td> <td>≤ 16</td> <td>≤ 18</td> <td>≤ 2</td> </tr> <tr> <td></td> <td>> 5</td> <td>> 4</td> <td>> 8</td> <td>> 12</td> <td>> 16</td> <td>> 18</td> <td>≤ 3</td> </tr> <tr> <td></td> <td colspan="6" style="text-align: center;">≥ 1</td> <td>≤ 5</td> </tr> </tbody> </table>	Modulation	Channel bandwidth / Transmission bandwidth (N _{RB})						MPR (dB)	1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz	QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1	16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1	64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2	256 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2		> 5	> 4	> 8	> 12	> 16	> 18	≤ 3		≥ 1						≤ 5
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	≥ 1						≤ 5																																																								
LTE A-MPR	In the base station simulator configuration, Network Setting value is set to NS_01 to disable A-MPR during SAR testing and the LTE SAR tests was transmitting on all TTI frames (Maximum TTI)																																																														
Spectrum plots for RB configuration	A properly configured base station simulator was used for the SAR and power measurement; therefore, spectrum plots for each RB allocation and offset configuration are not included in the SAR report.																																																														

Transmission (H, M, L) channel numbers and frequencies in each LTE band												
LTE Band 2												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	18607	1850.7	18615	1851.5	18625	1852.5	18650	1855	18675	1857.5	18700	1860
M	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880
H	19193	1909.3	19185	1908.5	19175	1907.5	19150	1905	19125	1902.5	19100	1900
LTE Band 4												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	19957	1710.7	19965	1711.5	19975	1712.5	20000	1715	20025	1717.5	20050	1720
M	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5
H	20393	1754.3	20385	1753.5	20375	1752.5	20350	1750	20325	1747.5	20300	1745
LTE Band 5												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz					
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	20407	824.7	20415	825.5	20425	826.5	20450	829				
M	20525	836.5	20525	836.5	20525	836.5	20525	836.5	20525	836.5	20525	836.5
H	20643	848.3	20635	847.5	20625	846.5	20600	844				
LTE Band 12												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz					
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	23017	699.7	23025	700.5	23035	701.5	23060	704				
M	23095	707.5	23095	707.5	23095	707.5	23095	707.5	23095	707.5	23095	707.5
H	23173	715.3	23165	714.5	23155	713.5	23130	711				
LTE Band 66												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	131979	1710.7	131987	1711.5	131997	1712.5	132022	1715	132047	1717.5	132072	1720
M	132322	1745	132322	1745	132322	1745	132322	1745	132322	1745	132322	1745
H	132665	1779.3	132657	1778.5	132647	1777.5	132622	1775	132597	1772.5	132572	1770

<For LTE Overlap Bands Description>

1) LTE Bands BW

Band	1.4 MHz	3 MHz	5 MHz	10 MHz	15 MHz	20 MHz
LTE Band 4	Yes	Yes	Yes	Yes	Yes	Yes
LTE Band 66	Yes	Yes	Yes	Yes	Yes	Yes

2) LTE Bands tune up:

Band	Full Tune-up Limit
LTE Band 4	22.5
LTE Band 66	22.5

5. RF Exposure Limits

5.1 Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

5.2 Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Limits for Occupational/Controlled Exposure (W/kg)

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

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

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

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

6. Specific Absorption Rate (SAR)

6.1 Introduction

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

6.2 SAR Definition

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

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

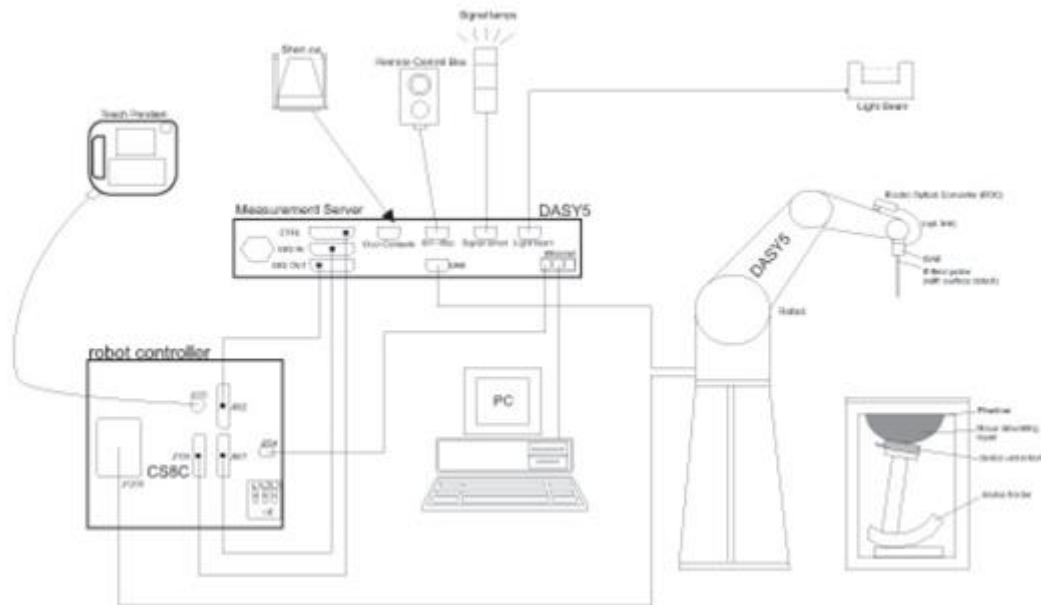
SAR is expressed in units of Watts per kilogram (W/kg)

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

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

7. System Description and Setup

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




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

7.1 E-Field Probe

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

<EX3DV4 Probe>

Construction	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	4 MHz – >10 GHz Linearity: ±0.2 dB (30 MHz – 10 GHz)	
Directivity	±0.3 dB in TSL (rotation around probe axis) ±0.5 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 µW/g – >100 mW/g Linearity: ±0.2 dB (noise: typically <1 µW/g)	
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: 2.5 mm (body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

7.2 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 7.1 Photo of DAE

7.3 Phantom

<SAM Twin Phantom>

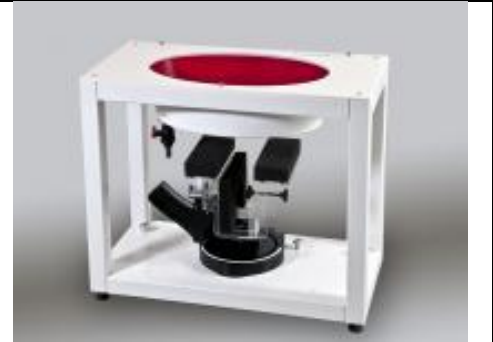
Shell Thickness	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm
Filling Volume	Approx. 25 liters
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet
Measurement Areas	Left Hand, Right Hand, Flat Phantom



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.

7.4 Device Holder

<Mounting Device for Hand-Held Transmitter>

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



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

8. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

- (a) For BT power measurement, use engineering software to configure EUT BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (b) Connect EUT RF port through RF cable to the power meter, and measure BT output power

<SAR measurement>

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

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

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

8.1 Spatial Peak SAR Evaluation

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

8.2 Power Reference Measurement

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

8.3 Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0 is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ 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.	

8.4 Zoom Scan

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

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.				

8.5 Volume Scan Procedures

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

8.6 Power Drift Monitoring

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



9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	750MHz System Validation Kit	D750V3	1099	Dec. 15, 2021	Dec. 13, 2024
SPEAG	835MHz System Validation Kit	D835V2	4d162	Dec. 17, 2021	Dec. 15, 2024
SPEAG	1750MHz System Validation Kit	D1750V2	1137	Oct. 19, 2021	Oct. 17, 2024
SPEAG	1900MHz System Validation Kit	D1900V2	5d182	Dec. 20, 2021	Dec. 18, 2024
SPEAG	2450MHz System Validation Kit	D2450V2	924	Nov. 03, 2023	Nov. 02, 2024
SPEAG	Data Acquisition Electronics	DAE4	1437	Mar. 14, 2024	Mar. 13, 2025
SPEAG	Dosimetric E-Field Probe	EX3DV4	3819	Jun. 06, 2023	Jun. 05, 2024
SPEAG	Dosimetric E-Field Probe	EX3DV4	7576	Aug. 23, 2023	Aug. 22, 2024
SPEAG	SAM Twin Phantom	QD 000 P40 CD	1670	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Radio communication analyzer	MT8821C	6262314715	Jul. 05, 2023	Jul. 04, 2024
Anritsu	Radio communication analyzer	MT8821C	6272278319	Jul. 05, 2023	Jul. 04, 2024
Keysight	Network Analyzer	E5071C	MY46523671	Oct. 16, 2023	Oct. 15, 2024
Speag	Dielectric Assessment KIT	DAK-3.5	1071	Feb. 19, 2024	Feb. 18, 2025
Agilent	Signal Generator	N5181A	MY50145381	Dec. 28, 2023	Dec. 27, 2024
R&S	Signal Generator	SMB100A	175779	Dec. 28, 2023	Dec. 27, 2024
Anritsu	Power Sensor	MA2411B	1306099	Oct. 16, 2023	Oct. 15, 2024
Anritsu	Power Meter	ML2495A	1349001	Oct. 16, 2023	Oct. 15, 2024
Anritsu	Power Sensor	MA2411B	1542004	Dec. 28, 2023	Dec. 27, 2024
Anritsu	Power Meter	ML2495A	1339473	Dec. 28, 2023	Dec. 27, 2024
R&S	CBT BLUETOOTH TESTER	CBT	100963	Dec. 28, 2023	Dec. 27, 2024
R&S	Spectrum Analyzer	FSP7	100818	Jul. 05, 2023	Jul. 04, 2024
TES	Hygrometer	1310	200505600	Jul. 08, 2023	Jul. 07, 2024
Anymetre	Thermo-Hygrometer	JR593	2015102801	Jan. 02, 2024	Jan. 01, 2025
SPEAG	Device Holder	N/A	N/A	N/A	N/A
AR	Amplifier	5S1G4	0333096	Note 1	
Mini-Circuits	Amplifier	ZVE-3W-83+	599201528	Note 1	
Mini-Circuits	Amplifier	ZVA-183W-S+	726202215	Note 1	
ARRA	Power Divider	A3200-2	N/A	Note 1	
ET Industries	Dual Directional Coupler	C-058-10	N/A	Note 1	
Jinkexinhua	Attenuator	10db-8G	N/A	Note 1	

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. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval.
3. The justification data of dipole can be found in appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

10. System Verification

10.1 Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, 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, which is shown in Fig. 10.1. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.2.

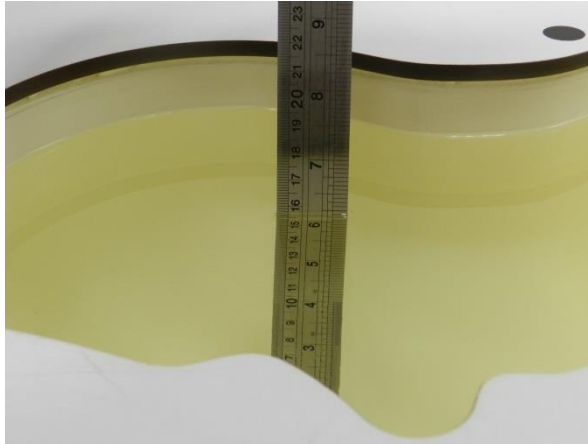


Fig 10.1 Photo of Liquid Height for Head SAR

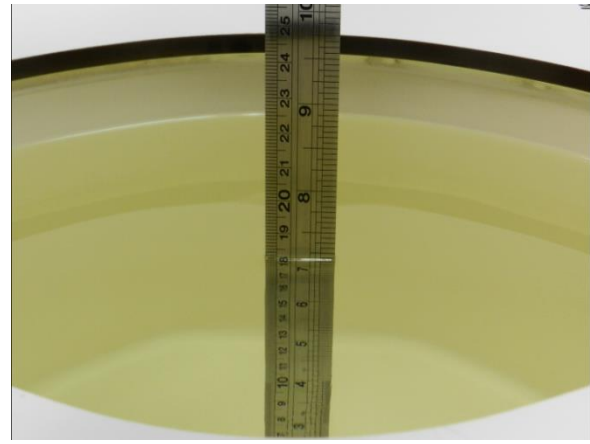


Fig 10.2 Photo of Liquid Height for Body SAR

10.2 Tissue Verification

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

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (ϵ_r)
For Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Tissue Type	Liquid Temp. ($^{\circ}$ C)	Conductivity (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Date
750	Head	22.5	0.894	41.019	0.89	41.90	0.45	-2.10	± 5	2024/5/17
835	Head	22.3	0.924	40.195	0.90	41.50	2.67	-3.14	± 5	2024/5/19
1750	Head	22.5	1.372	38.890	1.37	40.10	0.15	-3.02	± 5	2024/5/23
1900	Head	22.6	1.451	40.249	1.40	40.00	3.64	0.62	± 5	2024/5/25
2450	Head	22.4	1.810	39.280	1.80	39.20	0.56	0.20	± 5	2024/6/11

10.3 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.

<1g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2024/5/17	750	Head	250	1099	3819	1437	2.210	8.540	8.84	3.51
2024/5/19	835	Head	250	4d162	3819	1437	2.370	9.640	9.48	-1.66
2024/5/23	1750	Head	250	1137	3819	1437	9.370	36.500	37.48	2.68
2024/5/25	1900	Head	250	5d182	3819	1437	9.130	39.600	36.52	-7.78
2024/6/11	2450	Head	250	924	7576	1437	13.400	52.300	53.6	2.49

<10g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2024/5/17	750	Head	250	1099	3819	1437	1.370	5.650	5.48	-3.01
2024/5/19	835	Head	250	4d162	3819	1437	1.560	6.260	6.24	-0.32
2024/5/23	1750	Head	250	1137	3819	1437	4.970	19.200	19.88	3.54
2024/5/25	1900	Head	250	5d182	3819	1437	4.760	20.200	19.04	-5.74
2024/6/11	2450	Head	250	924	7576	1437	6.190	24.500	24.76	1.06

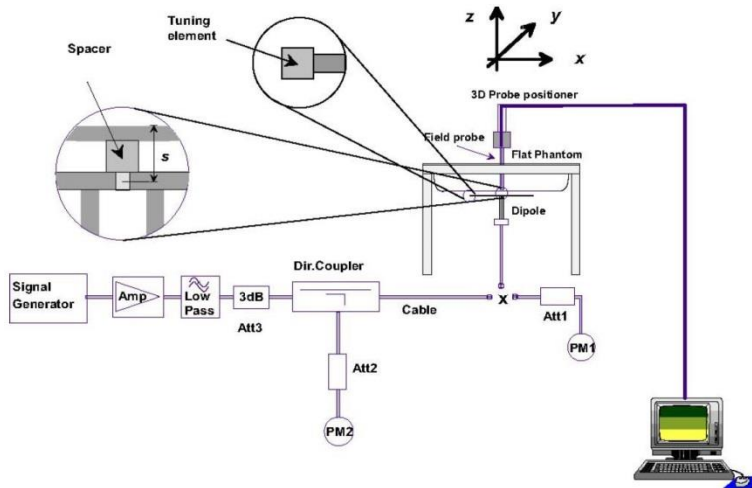


Fig 10.3.1 System Performance Check Setup



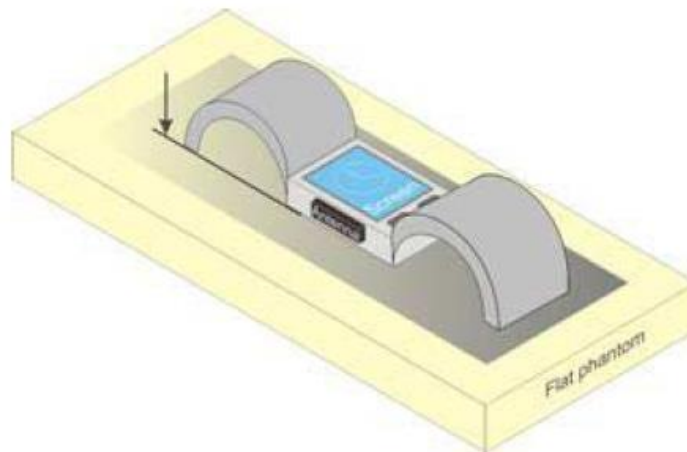
Fig 10.3.2 Setup Photo

11. RF Exposure Positions

11.1 Next to the Mouth and extremity Exposure Condition

A limb-worn device is a unit whose intended use includes being strapped to the arm of the user while transmitting. The strap shall be opened so that it is divided into two parts as following picture. The device shall be positioned directly against the phantom surface with the strap straightened as much as possible and the back of the device towards the phantom. If the strap cannot normally be opened to allow placing in direct contact with the phantom surface, it may be necessary to break the strap of the device but ensuring to not damage the antenna.

The device can use speak to Mouth mode, So this SAR test should be evaluated too. Adjust the distance between the device surface and the flat phantom to 10mm.





12. Conducted RF Output Power (Unit: dBm)

The detailed conducted power table can refer to Appendix E.

<LTE Conducted Power>

General Note:

1. Anritsu MT8820C base station simulator was used to setup the connection with EUT; the frequency band, channel bandwidth, RB allocation configuration, modulation type are set in the base station simulator to configure EUT transmitting at maximum power and at different configurations which are requested to be reported to FCC, for conducted power measurement and SAR testing.
2. Per KDB 941225 D05v02r05, when a properly configured base station simulator is used for the SAR and power measurements, spectrum plots for each RB allocation and offset configuration is not required.
3. Per KDB 941225 D05v02r05, start with the largest channel bandwidth and measure SAR for QPSK with 1 RB allocation, using the RB offset and required test channel combination with the highest maximum output power for RB offsets at the upper edge, middle and lower edge of each required test channel.
4. Per KDB 941225 D05v02r05, 50% RB allocation for QPSK SAR testing follows 1RB QPSK allocation procedure.
5. Per KDB 941225 D05v02r05, for QPSK with 100% RB allocation, SAR is not required when the highest maximum output power for 100 % RB allocation is less than the highest maximum output power in 50% and 1 RB allocations and the highest reported SAR for 1 RB and 50% RB allocation are ≤ 0.8 W/kg. Otherwise, SAR is measured for the highest output power channel; and if the reported SAR is > 1.45 W/kg, the remaining required test channels must also be tested.
6. Per KDB 941225 D05v02r05, 16QAM output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in QPSK and the reported SAR for the QPSK configuration is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, 16QAM SAR testing is not required.
7. Per KDB 941225 D05v02r05, smaller bandwidth output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in the largest supported bandwidth, and the reported SAR for the largest supported bandwidth is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, smaller bandwidth SAR testing is not required.
8. For LTE 4 / B5 / B12 the maximum bandwidth does not support three non-overlapping channels, per KDB 941225 D05v02r05, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.
9. LTE B4 SAR test was covered by B66; according to April 2015 TCB workshop, SAR test for overlapping LTE bands can be reduced if
 - a. the maximum output power, including tolerance, for the smaller band is \leq the larger band to qualify for the SAR test exclusion
 - b. the channel bandwidth and other operating parameters for the smaller band are fully supported by the larger band

**<WLAN Conducted Power>****General Note:**

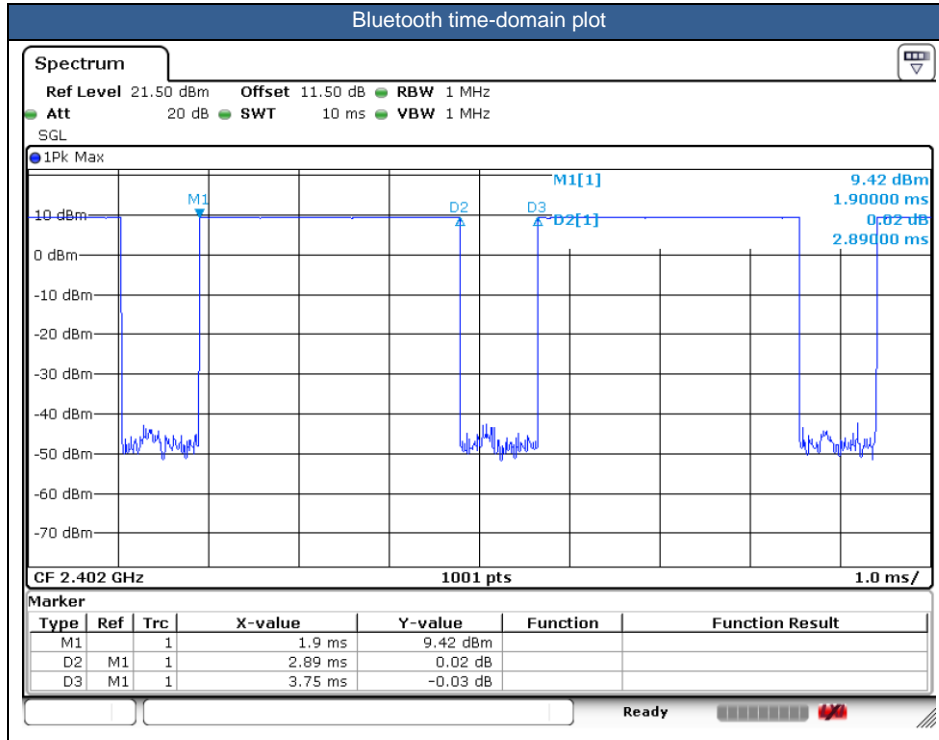
1. The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default 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.
2. 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.
3. 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).
4. 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.
5. 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.



<2.4GHz Bluetooth>

General Note:

1. For 2.4GHz Bluetooth SAR testing was selected 1Mbps, due to its highest average power.
2. The Bluetooth duty cycle are 77.07% as following figure, for Bluetooth SAR scaling need further consideration and the theoretical duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation





13. Antenna Location

The detailed antenna location information can refer to SAR Test Setup Photos.

14. SAR Test Results

General Note:

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For SAR testing of WLAN/Bluetooth signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)"
 - c. For WWAN: Reported SAR(W/kg)= Measured SAR(W/kg)*Tune-up Scaling Factor
 - d. For WLAN/Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)* Duty Cycle scaling factor * Tune-up scaling factor
2. 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
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/kg. Per KDB 865664 D01v01r04, if the extremity repeated SAR is necessary, the same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.
4. Head SAR is evaluated with the front of device and positioned at 10mm from a flat phantom filled with head tissue-equivalent medium for the SAR test.
5. Extremity SAR is evaluated with the back of the device positioned in direct contact against a flat phantom filled with head tissue-equivalent medium.

LTE Note:

1. Per KDB 941225 D05v02r05, start with the largest channel bandwidth and measure SAR for QPSK with 1 RB allocation, using the RB offset and required test channel combination with the highest maximum output power for RB offsets at the upper edge, middle and lower edge of each required test channel.
2. Per KDB 941225 D05v02r05, 50% RB allocation for QPSK SAR testing follows 1RB QPSK allocation procedure.
3. Per KDB 941225 D05v02r05, for QPSK with 100% RB allocation, SAR is not required when the highest maximum output power for 100 % RB allocation is less than the highest maximum output power in 50% and 1 RB allocations and the highest reported SAR for 1 RB and 50% RB allocation are ≤ 0.8 W/kg. Otherwise, SAR is measured for the highest output power channel; and if the reported SAR is > 1.45 W/kg, the remaining required test channels must also be tested.
4. Per KDB 941225 D05v02r05, 16QAM output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in QPSK and the reported SAR for the QPSK configuration is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, 16QAM SAR testing is not required.
5. Per KDB 941225 D05v02r05, smaller bandwidth output power for each RB allocation configuration is $>$ not $\frac{1}{2}$ dB higher than the same configuration in the largest supported bandwidth, and the reported SAR for the largest supported bandwidth is ≤ 1.45 W/kg; Per KDB 941225 D05v02r05, smaller bandwidth SAR testing is not required.
6. For LTE B4 / B5 / B12 the maximum bandwidth does not support three non-overlapping channels, per KDB 941225 D05v02r05, when a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.
7. LTE B4 SAR test was covered by B66; according to April 2015 TCB workshop, SAR test for overlapping LTE bands can be reduced if
 - a. the maximum output power, including tolerance, for the smaller band is \leq the larger band to qualify for the SAR test exclusion
 - b. the channel bandwidth and other operating parameters for the smaller band are fully supported by the larger band

WLAN/Bluetooth Note:

1. Per KDB 248227 D01v02r02, for 2.4GHz 802.11g/n SAR testing is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.
2. 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.
3. For all positions / configurations, when the reported SAR is > 0.8 W/kg, SAR is measured for these test positions / configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required channels are tested.
4. During SAR testing the WLAN transmission was verified using a spectrum analyzer.

14.1 Next to Mouth SAR

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Sample	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
1	LTE Band 12	10M	QPSK	1	25	Front	10mm	23095	707.5	1	22.21	23.00	1.199	-0.12	0.226	0.271
	LTE Band 12	10M	QPSK	25	12	Front	10mm	23095	707.5	1	21.31	22.00	1.172	-0.09	0.170	0.199
2	LTE Band 5	10M	QPSK	1	25	Front	10mm	20525	836.5	1	22.55	23.00	1.109	0.17	0.580	0.643
	LTE Band 5	10M	QPSK	25	12	Front	10mm	20525	836.5	1	21.35	22.00	1.161	-0.08	0.448	0.520
3	LTE Band 66	20M	QPSK	1	49	Front	10mm	132322	1745	1	22.18	22.50	1.076	-0.08	0.996	1.072
	LTE Band 66	20M	QPSK	1	49	Front	10mm	132322	1745	2	22.18	22.50	1.076	-0.08	0.884	0.952
	LTE Band 66	20M	QPSK	1	49	Front	10mm	132072	1720	1	21.89	22.50	1.151	-0.01	0.801	0.922
	LTE Band 66	20M	QPSK	1	49	Front	10mm	132572	1770	1	22.11	22.50	1.094	0.13	0.735	0.804
	LTE Band 66	20M	QPSK	50	24	Front	10mm	132322	1745	1	21.11	21.50	1.094	0.01	0.766	0.838
	LTE Band 66	20M	QPSK	50	24	Front	10mm	132072	1720	1	20.78	21.50	1.180	0.16	0.789	0.931
	LTE Band 66	20M	QPSK	50	24	Front	10mm	132572	1770	1	21.05	21.50	1.109	-0.05	0.741	0.822
	LTE Band 66	20M	QPSK	100	0	Front	10mm	132322	1745	1	20.53	21.50	1.250	0.15	0.665	0.831
	LTE Band 2	20M	QPSK	1	49	Front	10mm	18900	1880	1	22.20	22.50	1.072	-0.05	0.843	0.903
4	LTE Band 2	20M	QPSK	1	49	Front	10mm	18700	1860	1	22.17	22.50	1.079	0.18	0.871	0.940
	LTE Band 2	20M	QPSK	1	49	Front	10mm	19100	1900	1	22.05	22.50	1.109	0.03	0.787	0.873
	LTE Band 2	20M	QPSK	50	24	Front	10mm	18900	1880	1	21.15	21.50	1.084	-0.15	0.694	0.752
	LTE Band 2	20M	QPSK	100	0	Front	10mm	18900	1880	1	20.50	21.50	1.259	-0.02	0.610	0.768

Plot No.	Band	Mode	Test Position	Gap (mm)	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)
5	Bluetooth	DH5 1Mbps	Front	10mm	39	2441	1	9.10	10.00	1.230	77.07	1.298	-0.17	0.036	0.058
6	WLAN2.4GHz	802.11b 1Mbps	Front	10mm	11	2462	1	15.70	16.00	1.072	97.62	1.024	-0.13	0.305	0.335
	WLAN2.4GHz	802.11b 1Mbps	Front	10mm	11	2462	1	15.70	16.00	1.072	97.62	1.024	-0.13	0.191	0.210

14.2 Extremity SAR

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Sample	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 10g SAR (W/kg)	Reported 10g SAR (W/kg)
7	LTE Band 12	10M	QPSK	1	25	Back	0mm	23095	707.5	1	22.21	23.00	1.199	0.11	0.402	0.482
	LTE Band 12	10M	QPSK	25	12	Back	0mm	23095	707.5	1	21.31	22.00	1.172	-0.03	0.310	0.363
8	LTE Band 5	10M	QPSK	1	25	Back	0mm	20525	836.5	1	22.55	23.00	1.109	-0.13	0.664	0.736
	LTE Band 5	10M	QPSK	25	12	Back	0mm	20525	836.5	1	21.35	22.00	1.161	0.07	0.488	0.567
9	LTE Band 66	20M	QPSK	1	49	Back	0mm	132322	1745	1	22.18	22.50	1.076	0.13	1.640	1.765
	LTE Band 66	20M	QPSK	1	49	Back	0mm	132322	1745	2	22.18	22.50	1.076	0.13	1.470	1.582
	LTE Band 66	20M	QPSK	50	24	Back	0mm	132322	1745	1	21.11	21.50	1.094	0.05	1.230	1.346
10	LTE Band 2	20M	QPSK	1	49	Back	0mm	18900	1880	1	22.20	22.50	1.072	-0.09	1.350	1.447
	LTE Band 2	20M	QPSK	50	24	Back	0mm	18900	1880	1	21.15	21.50	1.084	-0.17	1.020	1.106

Plot No.	Band	Mode	Test Position	Gap (mm)	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 10g SAR (W/kg)	Reported 10g SAR (W/kg)
11	Bluetooth	DH5 1Mbps	Back	0mm	39	2441	1	9.10	10.00	1.230	77.07	1.298	-0.14	0.087	0.139
12	WLAN2.4GHz	802.11b 1Mbps	Back	0mm	11	2462	1	15.70	16.00	1.072	97.62	1.024	-0.04	0.600	0.658
	WLAN2.4GHz	802.11b 1Mbps	Back	0mm	11	2462	2	15.70	16.00	1.072	97.62	1.024	-0.04	0.425	0.466

14.3 Repeated SAR Measurement

<1g>

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Ratio	Reported 1g SAR (W/kg)
1st	LTE Band 66	20M	QPSK	1	49	Front	10mm	132322	1745	22.18	22.50	1.076	-0.08	0.996	1	1.072
2nd	LTE Band 66	20M	QPSK	1	49	Front	10mm	132322	1745	22.18	22.50	1.076	0.01	0.991	1.005	1.067
1st	LTE Band 2	20M	QPSK	1	49	Front	10mm	18700	1860	22.17	22.50	1.079	0.18	0.871	1	0.940
2nd	LTE Band 2	20M	QPSK	1	49	Front	10mm	18700	1860	22.17	22.50	1.079	0.09	0.864	1.008	0.932

General Note:

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

15. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Next to Mouth	Extremity
1.	WWAN + WLAN2.4GHz	Yes	Yes
2.	WWAN + Bluetooth	Yes	Yes
3.	WWAN + WLAN2.4GHz + Bluetooth	Yes	Yes

General Note:

- This device supported VoIP in LTE (e.g. 3rd party VoIP), LTE supports VoLTE operation.
- According to the EUT characteristic, WLAN 2.4GHz and Bluetooth can transmit simultaneously.
- All licensed modes share the same antenna part and cannot transmit simultaneously.
- The Scaled SAR summation is calculated based on the same configuration and test position.
- For standalone WWAN, always choose the highest SAR among all WWAN bands within the selected antenna per each exposure position to perform simultaneous transmission analysis with WLAN/BT. This is the worst co-located analysis and can represent each band.
- Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
 - Scalar SAR summation < 1.6W/kg and 10g Scalar SAR summation < 4.0W/kg.
 - $SPLSR = (SAR1 + SAR2)^{1.5} / (\text{min. separation distance, mm})$, 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.
 - If $SPLSR \leq 0.04$ for 1g SAR, $SPLSR \leq 0.10$ for 10g SAR simultaneously transmission SAR measurement is not necessary.
 - Simultaneously transmission SAR measurement, and the reported multi-band 1g SAR < 1.6W/kg and 10g SAR < 4.0W/kg.

15.1 Next to Mouth Exposure Conditions

WWAN Band	Exposure Position	1	2	3	1+2	1+3	1+2+3
		WWAN	WLAN2.4GHz	Bluetooth	Summed	Summed	Summed
		1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)
All bands	Front at 10mm	1.072	0.335	0.058	1.41	1.13	1.47

15.2 Extremity Exposure Conditions

WWAN Band	Exposure Position	1	2	3	1+2	1+3	1+2+3
		WWAN	WLAN2.4GHz	Bluetooth	Summed	Summed	Summed
		10g SAR (W/kg)	10g SAR (W/kg)	10g SAR (W/kg)	10g SAR (W/kg)	10g SAR (W/kg)	10g SAR (W/kg)
All band	Back at 0mm	1.765	0.139	0.658	1.90	2.42	2.56

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16. Uncertainty Assessment

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



17. References

- [1] FCC 47 CFR Part 2 “Frequency Allocations and Radio Treaty Matters; General Rules and Regulations”
- [2] ANSI/IEEE Std. C95.1-1992, “IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz”, September 1992
- [3] IEEE Std. 1528-2013, “IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques”, Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [6] FCC KDB 865664 D02 v01r02, “RF Exposure Compliance Reporting and Documentation Considerations” Oct 2015.
- [7] FCC KDB 447498 D01 v06, “Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies”, Oct 2015
- [8] FCC KDB 248227 D01 v02r02, “SAR Guidance for IEEE 802.11 (WiFi) Transmitters”, Oct 2015.
- [9] FCC KDB 941225 D05 v02r05, “SAR Evaluation Considerations for LTE Devices”, Dec 2015

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