TEST REPORT

Product Name : ATOM Controller iOS

Model Number : ATOM Controller

FCC ID : XGB-ATOMIL

Prepared for	:	Voyetra Turtle Beach, Inc.
Address	:	44 South Broadway, 4th Floor, 10601, White Plains, New York, United States of America
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Report Number	:	ENS2303280001W00804R
Date(s) of Tests	:	Jun 20, 2023 to Jun 20, 2023
Date of Issue	:	Jun 21, 2023

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Modified Information

Version	Report No.	Revision Date	Summary
Ver.1.0	ENS2303280001W00804R	/	Original Report

1. TEST RESULT CERTIFICATION

Applicant	:	Voyetra Turtle Beach, Inc.
Address	:	44 South Broadway, 4th Floor, 10601, White Plains, New York, United States of America
Manufacturer	:	Voyetra Turtle Beach, Inc.
Address	:	44 South Broadway, 4th Floor, 10601, White Plains, New York, United States of America
EUT	:	ATOM Controller iOS
Model Name	:	ATOM Controller
Trademark	:	TURTLE BEACH

Measurement Procedure Used:

APPLICABLE STANDARDS	
STANDARD	**TEST RESULT**
FCC 47 CFR Part 2$2.1093,KDB 865664 D01 v01r04,IEEE Std C95.1-2005 ,KDB 447498 D01 v06,KDB 865664 D02 v01r02	PASS

CERTIFICATION: The above equipment have been tested by EMTEK (SHENZHEN) CO., LTD.Bldg 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. This report shall not be reproduced, except in full, without the written approval of EMTEK (SHENZHEN) CO., LTD.

Date of Test	:	Jun 20, 2023 to Jun 20, 2023
Prepared by	:	Jim Cai Jim Cai/Editor
Reviewer	:	Joe Xia Joe Xia/Supervisor
Approved & Authorized Signer	:	Lisa Wang/Manager

EMTEK (SHENZHEN) CO., LTD. TESTING

Equipment Class	Mode	Highest Reported Body SAR_{1g} (W/kg)
DSS	Bluetooth	0.143

Note:

1. The SAR limit **(Head & Body: SAR_{1g}1.6 W/kg, Extremity: SAR_{10g} 4.0 W/kg)**for general population/uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.

2. Description of Equipment Under Test

EUT Type	ATOM Controller iOS
Trade Mark	TURTLE BEACH
Model Name	ATOM Controller
Tx Frequency Bands (Unit: MHz)	Bluetooth : 2402 ~ 2480
Uplink Modulations	Bluetooth : GFSK, π/4-DQPSK, 8-DPSK, BLE
Maximum Tune-up Conducted Power (Unit: dBm)	BT: 6.5 BLE: 5.5
Power supply	DC 5V from Adapter DC 3.7V from Internal Battery
Antenna Type	Integrated Antenna
EUT Stage	Identical Prototype

3. SAR Measurement System

3.1 Definition of SpecificAbsorptionRate (SAR)

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.

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 measurement can be related to the electrical field in the tissue by

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

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

3.2 SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASYsoftware can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.

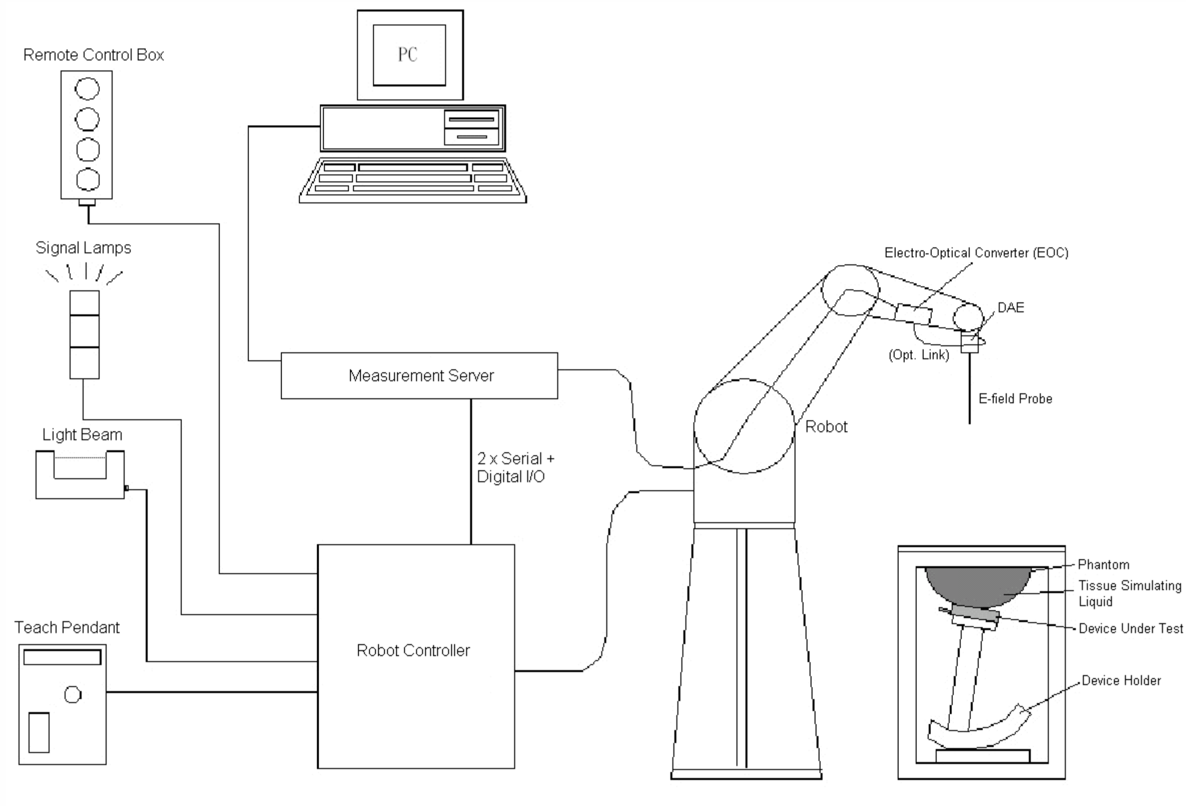


Fig-3.1 DASY System Setup

3.2.1 Robot

The DASYsystem uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ±0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

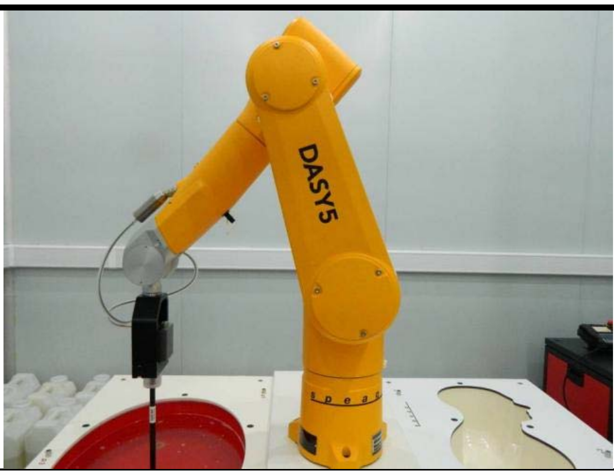


Fig-3.2 DASY5

3.2.2 Probes

The SAR measurement is conducted with the dosimetricprobe.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.

Model	EX3DV4
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).
Frequency	10 MHz to 6 GHz Linearity: ± 0.2 dB
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 μW/g to 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

3.2.3 Data Acquisition Electronics (DAE)

Model	DAE3
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)
Input Offset Voltage	< 5μV (with auto zero)
Input Bias Current	< 50 fA
Dimensions	60 x 60 x 68 mm

3.2.4 Phantoms

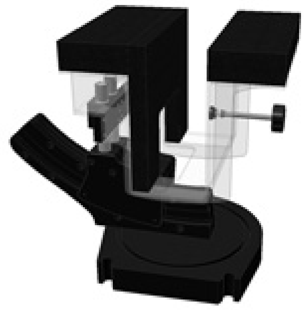
Model	Twin SAM
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.
Material	Vinylester, glass fiber reinforced (VE-GF)
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet
Filling Volume	approx. 25 liters

Model	ELI
Construction	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.
Material	Vinylester, glass fiber reinforced (VE-GF)
Shell Thickness	2.0 ± 0.2 mm (bottom plate)
Dimensions	Major axis: 600 mm Minor axis: 400 mm
Filling Volume	approx. 30 liters

3.2.5 Device Holder

Model	Mounting Device
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).
Material	POM

Model	Laptop Extensions Kit
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.
Material	POM, Acrylic glass, Foam



3.2.6 System Validation Dipoles

Model	D-Serial
Construction	Symmetrical dipole with l/4 balun. Enables measurement of feedpoint impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.
Frequency	750 MHz to 5800 MHz
Return Loss	> 20 dB
Power Capability	> 100 W (f < 1GHz),> 40 W (f > 1GHz)

3.2.7 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm.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. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.

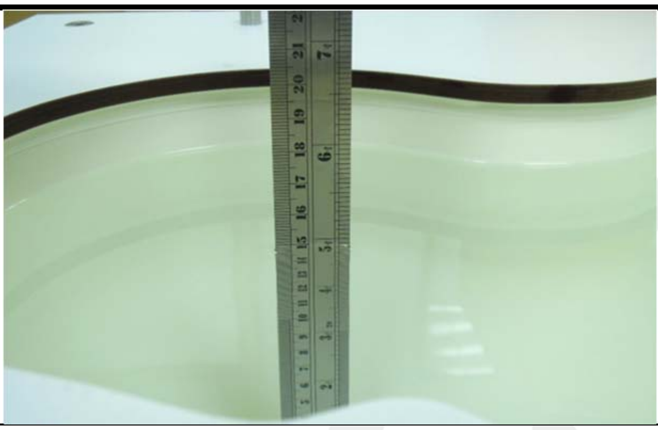
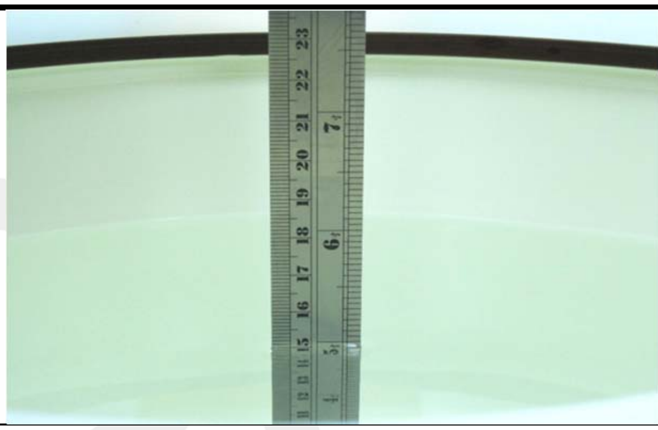
	

Photo of Liquid Height for Head Position	**Photo of Liquid Height for Body Position**

The dielectric properties of the head tissue simulating liquids are defined in IEEE1528,and KDB 865664 D01 Appendix A. For the body tissue simulating liquids, the dielectric properties are defined in KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

Table-3.1Targets of Tissue Simulating Liquid

Frequency (MHz)	Target Permittivity	Range of ±5%	Target Conductivity	Range of ±5%
For Head				
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53

The following table gives the recipes for tissue simulating liquids.

Table-3.2Recipes of Tissue Simulating Liquid

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

3.3 SAR System Verification

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.

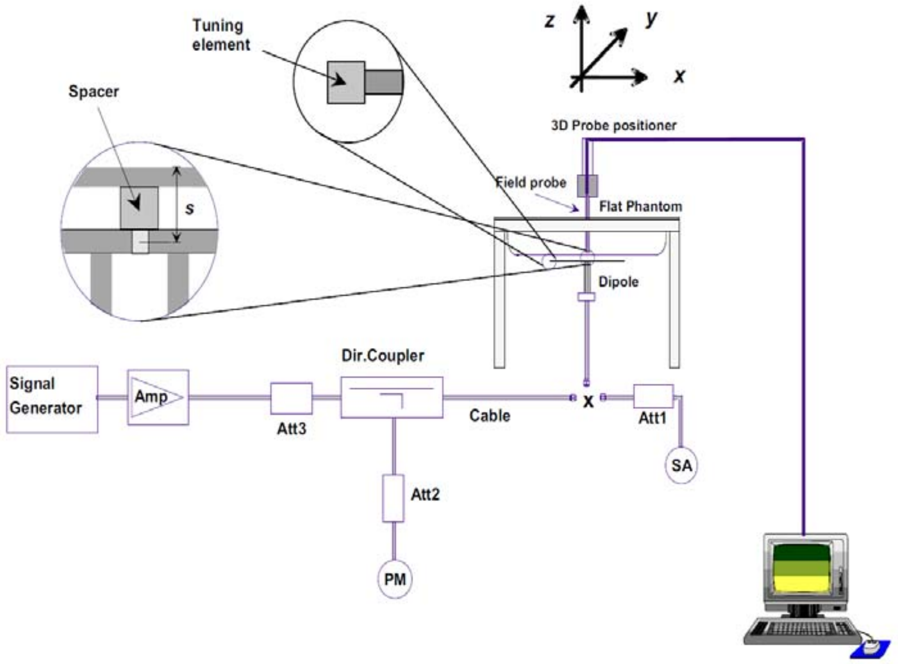


Fig-3.4 System Verification Setup

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power (250 mW is used for 700 MHz to 3 GHz, 100 mW is used for 3.5 GHz to 6 GHz) at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

3.4 SAR Measurement Procedure

According to the SAR 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

The SAR measurement procedures for each of test conditions are as follows:

(a) Make EUT to transmit maximum output power
(b) Measure conducted output power through RF cable
(c) Place the EUT in the specific position of phantom
(d) Perform SAR testing steps on the DASY system
(e) Record the SAR value

3.4.1 Area & Zoom Scan Procedure

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 is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664D01, the resolution for Area and Zoom scan is specified in the table below.

Items	≤ 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan (Δx, Δy)	≤ 15 mm	≤ 12 mm	≤ 12 mm	≤ 10 mm	≤ 10 mm
Zoom Scan (Δx, Δy)	≤ 8 mm	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 4 mm
Zoom Scan (Δz)	≤ 5 mm	≤ 5 mm	≤ 4 mm	≤ 3 mm	≤ 2 mm
Zoom Scan Volume	≥ 30 mm	≥ 30 mm	≥ 28 mm	≥ 25 mm	≥ 22 mm

Note:

When zoom scan is required and report SAR is ≤1.4 W/kg, the zoom scan resolution of Δx / Δy (2-3GHz: ≤ 8 mm, 3-4GHz: ≤ 7 mm, 4-6GHz: ≤ 5 mm) may be applied.

3.4.2 VolumeScan Procedure

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.

3.4.3 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 drift more than 5%, the SAR will be retested.

3.4.4 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 form the measurement grid to the high-resolution grid
(e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
(f) Calculation of the averaged SAR within masses of 1g and 10g

3.4.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

4. SARMeasurement Evaluation

4.1 Applicable Standards

FCC 47 CFR Part 2$2.1093
KDB 865664 D01 v01r04
IEEE Std C95.1-2005
KDB 447498 D01 v06
KDB 865664 D02 v01r02

4.2 EUT Testing Position

4.2.1 Hand-held usage of the device, not at the head or torso

When SAR measurement is necessary for hand-held devices that do not transmit while at the head or torso, a flat phantom may be used. To assess this type of device, the device shall be placed directly against the flat phantom as shown in Figure 11, for the sides of the device that are in contact with the hand for the intended use.

NOTE Concerning a measurement phantom representing the hand, there are practical difficulties in specifying a unique hand holding position that is applicable to all devices. Additional studies are needed for devising a representative method for evaluating SAR in the hand of hand-held devices (whether or not they are hand-operated devices). Future versions of this document are intended to contain a test method based on scientific data and rationale.

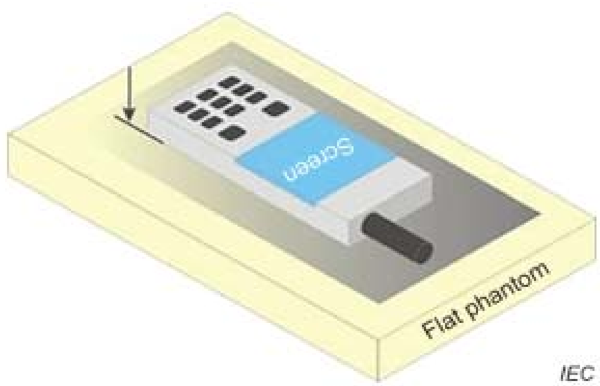
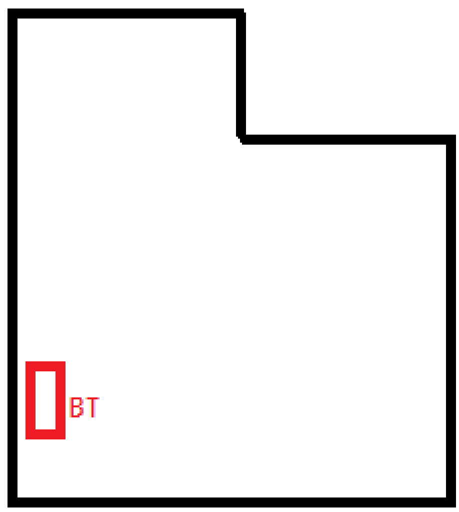


Fig-4.1 Test position for hand-held devices, not used at the head or torso

<Antenna Location>

EUT Top Side

EUT Left Side



EUT Right Side

EUT Bottom Side

<EUT Front View>

The separation distance for antenna to edge:

Antenna	To Left Side (mm)	To Right Side (mm)	To Top Side (mm)	To Rear Face (mm)	To Bottom Side (mm)	To Front Face (mm)
BT/BLE	5	80	75	25	20	5

4.2.2 SAR Test Exclusion Evaluations

According to KDB 447498 D01, the SAR test exclusion condition is based on source-based time-averaged maximumconducted output power, adjusted for tune-up tolerance, and theminimum test separation distance required for the exposure conditions. The SAR exclusion threshold is determined by the following formula.

1. For the test separation distance ≤ 50 mm

$$\frac{\textbf{Max. Tune up Power}_{(mW)}}{\textbf{Min. Test Separation Distance}_{(mm)}} \times \sqrt{f_{(GHz)}} \leq 3.0 \text{ for SAR-1g}, \leq 7.5 \text{ for SAR-10g}$$

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

2. For the test separation distance > 50 mm, and the frequency at 100 MHz to 1500 MHz

$$\left[(\text{Threshold at 50 mm in Step 1}) + (\text{Test Separation Distance} - 50 \text{ mm}) \times \left(\frac{f_{(MHz)}}{150}\right)\right]_{(mW)}$$

3. For the test separation distance > 50 mm, and the frequency at > 1500 MHz to 6 GHz

$$[(\text{Threshold at 50 mm in Step 1}) + (\text{Test Separation Distance} - 50 \text{ mm}) \times 10]_{(mW)}$$

<BT >

Mode	Max. Tune-up Power (dBm)	Max. Tune-up Power (mW)	LeftSide			RightSide			TopSide			BottomSide		
			Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?
BT	6.5	4.47	5	2.717	YES	80	395 mW	No	75	345 mW	No	20	38.100	No

<BLE >

Mode	Max. Tune-up Power (dBm)	Max. Tune-up Power (mW)	LeftSide			RightSide			TopSide			BottomSide		
			Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calcu24late d Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?
BLE	5.5	3.55	5	2.788	YES	80	397 mW	No	75	347 mW	No	20	38.714	No

Note:

1. When separation distance ≤ 50 mm and the calculated result shown in above table is ≤ 3.0 for SAR-1g exposure condition, or ≤ 7.5 for SAR-10g exposure condition, the SAR testing exclusion is applied.
2. When separation distance > 50 mm and the device output power is less than the calculated result (power threshold, mW) shown in above table, the SAR testing exclusion is applied.

4.3 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Liquid Temp. (℃)	Measured Conductivity (σ)	Measured Permittivity (ε_r)	Target Conductivity (σ)	Target Permittivity (ε_r)	Conductivity Deviation (%)	Permittivity Deviation (%)
Jun. 20, 2023	Head	2450	22.4	1.79	40.11	1.80	39.20	-0.56	2.32

Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within ±5% of the target values. Liquid temperature during the SAR testing must be within ±2 ℃.

4.4 System Validation

The SAR measurement system was validated according to procedures in KDB 865664 D01. The validation status in tabulated summary is as below.

Calibration Date	Probe S/N	Calibration Point		Measured Conductivity (σ)	Measured Permittivity (ε_r)	Validation for CW			Validation for Modulation		
						Sensitivity Range	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
Jun. 20, 2023	3970	Head	2450	1.79	40.11	Pass	Pass	Pass	OFDM	N/A	Pass

4.5 System Verification

The measuring result for system verification istabulated as below.

Test Date	Mode	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Jun. 20, 2023	Head	2450	52.10	13.60	54.40	4.41	927	3970	1418

Note:

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

4.6 Maximum Output Power

4.6.1 Maximum Conducted Power

The maximum conducted averagepower (Unit: dBm) including tune-up tolerance is shown as below.

Mode	Bluetooth
GFSK	5.00
π/4-DQPSK	6.50
8-DPSK	5.50
LE1M	5.50

4.6.2 Measured Conducted Power Result

The measuring conducted power (Unit: dBm) is shown as below.

<Bluetooth>

Mode	Bluetooth GFSK		
Channel / Frequency (MHz)	0 (2402)	39 (2441)	78 (2480)
conducted power	4.65	3.54	4.47
Mode	Bluetoothπ/4-DQPSK		
Channel / Frequency (MHz)	0 (2402)	39 (2441)	78 (2480)
conducted power	5.87	5.03	6.05
Mode	Bluetooth 8-DPSK		
Channel / Frequency (MHz)	0 (2402)	39 (2441)	78 (2480)
conducted power	5.22	4.38	5.24
Mode	BLE 1M		
Channel / Frequency (MHz)	0 (2402)	19 (2440)	39 (2480)
conducted power	5.27	4.15	4.55

4.7 SAR Testing Results

4.7.1 SAR Test Reduction Considerations

<KDB 447498 D01, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

(1) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz

(2) ≤ 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

(3) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

4.7.2 SAR Results for Body Exposure Condition

Plot No.	Band	Mode	Test Position	Antenna	Ch.	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Power Drift (dB)	Measured SAR-1g (W/kg)	Scaling Factor	Scaled SAR-1g (W/kg)
1	Bluetooth	DH5	Rear Face	-	78	5.00	4.47	-0.10	0.012	1.130	0.014
	Bluetooth	DH5	Front Face	-	78	5.00	4.47	0.01	0.038	1.130	0.043
	Bluetooth	DH5	Left Side	-	78	5.00	4.47	-0.16	0.055	1.130	0.062
	Bluetooth	2DH5	Rear Face	-	78	6.50	6.05	0.01	0.020	1.109	0.022
	Bluetooth	2DH5	Front Face	-	78	6.50	6.05	0.05	0.069	1.109	0.077
	Bluetooth	2DH5	Left Side	-	78	6.50	6.05	-0.12	0.129	1.109	0.143
	Bluetooth	3DH5	Rear Face	-	78	5.50	5.24	-0.18	0.015	1.062	0.016
	Bluetooth	3DH5	Front Face	-	78	5.50	5.24	0.13	0.040	1.062	0.042
	Bluetooth	3DH5	Left Side	-	78	5.50	5.24	-0.16	0.083	1.062	0.088
	Bluetooth	BLE 1M	Rear Face	-	0	5.50	5.27	-0.12	<0.001	1.054	<0.001
	Bluetooth	BLE 1M	Front Face	-	0	5.50	5.27	0.15	0.014	1.054	0.015
	Bluetooth	BLE 1M	Left Side	-	0	5.50	5.27	-0.17	0.115	1.054	0.121

Note:

1.SAR tests use the same power level as RF tests

2.Due the antenna location and antenna performance results much lower SAR result ,and lower than the lowest system limit, then we show “<0.001W/Kg” in the report

3.The scaled sar calculation takes into account the values including the Bluetooth duty cycle during the test,Has been configured in software testing,Therefore, the final sar value includes the Bluetooth duty cycle calculation

4.7.3 Estimated SAR Calculation

According to KDB 447498 D01, when standalone SAR test exclusion applies to an antenna, the standalone SAR was estimated according to following formula to result in substantially conservative SAR values of ≤ 0.4 W/kg to determine SAR test exclusion.

$$\text{Estimated SAR} = \frac{\text{Max. Tune up Power}_{(mW)}}{\text{Min. Test Separation Distance}_{(mm)}} \times \frac{\sqrt{f_{(GHz)}}}{7.5}$$

If the minimum test separation distance is < 5 mm, a distance of 5 mm is used for estimated SAR calculation. When the test separation distance is > 50 mm, the 0.4 W/kg is used for SAR-1g.

Mode / Band	Frequency (GHz)	Max.Tune-up Power (dBm)	Test Position	Separation Distance (mm)	Estimated SAR (W/kg)
/	/	/	/	/	/

Note:

1. The separation distance is determined from the outer housing of the EUT to the user.
2. When standalone SAR testing is not required, an estimated SAR can be applied to determine simultaneous transmission SAR test exclusion.

5. Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	927	Feb. 16, 2022	3 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	7336	Dec. 02, 2022	1 Year
Data Acquisition Electronics	SPEAG	DAE3	373	Dec. 28, 2022	1 Year
ENA Series Network Analyzer	Agilent	E5071B	MY42404246	May. 14, 2022	1 Year
Signal Analyzer	Agilent	N9010A	MY53470879	May. 14, 2022	1Year
Signal Generator	Agilent	SMM100A	17-1050100-C	May. 9, 2022	1 Year
Power Sensor	Agilent	E9304A H18	MY52050011	May. 17, 2022	1 Year
Power Meter	BOONTON	4232A	10539	May. 14, 2022	1 Year
Power Sensor	BOONTON	51011EMC	36164	May. 14, 2022	1 Year
Electronic Thermometer	Hegao	HTC-1	\	May. 17, 2022	1 Year
Directional Coupler	MILMEGA	DC6180AM1	0340463	May. 14, 2022	1 Year

6. Measurement Uncertainty

Source of Uncertainty	Tolerance (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (± %, 1g)	Standard Uncertainty (± %, 10g)	Vi
Measurement System								
Probe Calibration	6.0	Normal	1	1	1	6.05	6.05	∞
Axial Isotropy	4.7	Rectangular	√3	0.7	0.7	1.9	1.9	∞
Hemispherical Isotropy	9.6	Rectangular	√3	0.7	0.7	3.9	3.9	∞
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Probe Modulation Response	2.4	Rectangular	√3	1	1	1.4	1.4	∞
Detection Limits	0.25	Rectangular	√3	1	1	0.14	0.14	∞
Boundary Effect	1.0	Rectangular	√3	1	1	0.6	0.6	∞
Readout Electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response Time	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Integration Time	1.7	Rectangular	√3	1	1	1.0	1.0	∞
RF Ambient Conditions – Noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF Ambient Conditions – Reflections	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe Positioner Mech. Restrictions	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe Positioning with Respect to Phantom Shell	2.9	Rectangular	√3	1	1	1.7	1.7	∞
Post-processing	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Test Sample Related								
Device Holder Uncertainty	4.2 / 1.8	Normal	1	1	1	4.2	1.8	32
Test Sample Positioning	1.5 / 0.7	Normal	1	1	1	1.5	0.7	32
Power Scaling	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Power Drift of Measured SAR	5.0	Rectangular	√3	1	1	2.9	2.9	∞
Phantom and Setup								
Phantom Uncertainty (Shape and Thickness Tolerances)	7.2	Rectangular	√3	1	1	4.2	4.2	∞
Algorithm for Correcting SAR for	1.2 / 0.97	Normal	1	1	0.84	1.2	0.8	∞

Deviations in Permittivity and Conductivity								
Liquid Conductivity (Meas.)	1.0	Normal	1	0.78	0.71	0.8	0.7	25
Liquid Permittivity (Meas.)	0.5	Normal	1	0.23	0.26	0.1	0.1	25
Liquid Conductivity– Temperature Uncertainty	2.2	Rectangular	√3	0.78	0.71	1.0	0.9	∞
Liquid Permittivity– Temperature Uncertainty	1.9	Rectangular	√3	0.23	0.26	0.3	0.3	∞
Combined Standard Uncertainty						±12.1%	± 11.4 %	
Expanded Uncertainty (K=2)						**±24.2%**	**±22.8%**	

Uncertainty budget for frequency range 300 MHz to 3 GHz

Source of Uncertainty	Tolerance (± %)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (± %, 1g)	Standard Uncertainty (± %, 10g)	Vi
Measurement System								
Probe Calibration	6.55	Normal	1	1	1	6.65	6.65	∞
Axial Isotropy	4.7	Rectangular	√3	0.7	0.7	1.9	1.9	∞
Hemispherical Isotropy	9.6	Rectangular	√3	0.7	0.7	3.9	3.9	∞
Linearity	4.7	Rectangular	√3	1	1	2.7	2.7	∞
Probe Modulation Response	2.4	Rectangular	√3	1	1	1.4	1.4	∞
Detection Limits	0.25	Rectangular	√3	1	1	0.14	0.14	∞
Boundary Effect	2.0	Rectangular	√3	1	1	1.2	1.2	∞
Readout Electronics	0.3	Normal	1	1	1	0.3	0.3	∞
Response Time	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Integration Time	1.7	Rectangular	√3	1	1	1.0	1.0	∞
RF Ambient Conditions – Noise	3.0	Rectangular	√3	1	1	1.7	1.7	∞
RF Ambient Conditions – Reflections	3.0	Rectangular	√3	1	1	1.7	1.7	∞
Probe Positioner Mech. Restrictions	0.4	Rectangular	√3	1	1	0.2	0.2	∞
Probe Positioning with Respect to Phantom Shell	6.7	Rectangular	√3	1	1	3.9	3.9	∞
Post-processing	4.0	Rectangular	√3	1	1	2.3	2.3	∞
Test Sample Related								
Device Holder Uncertainty	4.2 / 1.8	Normal	1	1	1	4.2	1.8	32
Test Sample Positioning	1.5 / 0.7	Normal	1	1	1	1.5	0.7	32
Power Scaling	0.0	Rectangular	√3	1	1	0.0	0.0	∞
Power Drift of Measured SAR	5.0	Rectangular	√3	1	1	2.9	2.9	∞
Phantom and Setup								
Phantom Uncertainty (Shape and Thickness Tolerances)	7.6	Rectangular	√3	1	1	4.4	4.4	∞
Algorithm for Correcting SAR for Deviations in Permittivity and Conductivity	1.2 / 0.97	Normal	1	1	0.84	1.2	0.8	∞

Liquid Conductivity (Meas.)	1.0	Normal	1	0.78	0.71	0.8	0.7	25
Liquid Permittivity (Meas.)	0.5	Normal	1	0.23	0.26	0.1	0.1	25
Liquid Conductivity– Temperature Uncertainty	2.2	Rectangular	√3	0.78	0.71	1.0	0.9	∞
Liquid Permittivity– Temperature Uncertainty	1.9	Rectangular	√3	0.23	0.26	0.3	0.3	∞
Combined Standard Uncertainty						±13.2%	±12.5	
Expanded Uncertainty (K=2)						**±26.4%**	**±25.0%**	

Uncertainty budget for frequency range 3 GHz to 6 GHz

7. Information on the Testing Laboratories

We, EMTEK (SHENZHEN) CO., LTD., were founded in 2000 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

Site Description
EMC Lab. : **Accredited by CNAS**
The Certificate Registration Number is L2291.
The Laboratory has been assessed and proved to be in compliance with CNAS-CL01 (identical to ISO/IEC 17025:2017)

Accredited by FCC
Designation Number: CN1204
Test Firm Registration Number: 882943

Accredited by A2LA
The Certificate Number is 4321.01.

Accredited by Industry Canada
The Conformity Assessment Body Identifier is CN0008

Name of Firm : EMTEK (SHENZHEN) CO., LTD.
Site Location : Building 69, Majialong Industry Zone, Nanshan District, Shenzhen, Guangdong, China

If you have any comments, please feel free to contact us at the following:

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TEL: 86-755-26954280
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Email: csg@emtek.com.cn
Web Site: www.emtek.com.cn

The road map of all our labs can be found in our web site also.

--- End of Report ---

Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.

Appendix B. SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination are shown as follows.

Appendix C. Calibration Certificate for Probe and Dipole

The calibration certificates are shown as follows.

Appendix D. Photographs of EUT and Setup