

# FCC SAR Test Report

APPLICANT : Fitbit LLC  
EQUIPMENT : Wireless Device  
MODEL NAME : FB424  
FCC ID : XRAFB424  
STANDARD : FCC 47 CFR Part 2 (2.1093)

We, Sporton International Inc. (Kunshan), 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. (Kunshan), the test report shall not be reproduced except in full.



Approved by: Si Zhang



**Sporton International Inc. (Kunshan)**  
No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300  
People's Republic of China



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### Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA232407	Rev. 01	Initial issue of report	Jun. 01, 2022
FA232407	Rev. 02	Corrected Equipment name and removed Brand name	Aug. 11, 2022



### 1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Fitbit LLC, Wireless Device, FB424**, are as follows.

Highest 1g SAR Summary			
Equipment Class	Frequency Band		Body 1g SAR (W/kg) (Separation 0mm)
DTS	Bluetooth	2.4GHz Bluetooth	<b>0.36</b>
Date of Testing:			2022/5/23

Highest 10g SAR Summary			
Equipment Class	Frequency Band		Extremity 10g SAR (W/kg) (Separation 0mm)
DTS	Bluetooth	2.4GHz Bluetooth	<b>0.33</b>
Date of Testing:			2022/5/23

#### 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 10g Extremity 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. (Kunshan) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.02.

Testing Laboratory			
Test Firm	Sporton International Inc. (Kunshan)		
Test Site Location	No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300 People's Republic of China TEL : +86-512-57900158 FAX : +86-512-57900958		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR02-KS	CN1257	314309

Applicant	
Company Name	Fitbit LLC
Address	199 Fremont St., 14th Floor, San Francisco, CA 94105, USA

Manufacturer	
Company Name	Fitbit LLC
Address	199 Fremont St., 14th Floor, San Francisco, CA 94105, USA

## **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 D04 Interim General RF Exposure Guidance v01



#### 4. Equipment Under Test (EUT) Information

##### 4.1 General Information

Product Feature & Specification	
Equipment Name	Wireless Device
Model Name	FB424
FCC ID	XRAFB424
Wireless Technology and Frequency Range	Bluetooth: 2402 MHz ~ 2480 MHz
Mode	Bluetooth LE
HW Version	EVT
SW Version	63.20001.175.1
EUT Stage	Production Unit
<b>Remark:</b>	
<ol style="list-style-type: none"><li>1. The EUT has three configs, they are only Battery suppliers are different, so only choose battery 1 to perform full SAR testing.</li><li>2. This device will be equipped with the back clip pendant or Strap, the back clip pendant and one strap are a metallic wristband and do not contain any electronic circuitry.</li><li>3. When using the back clip, body exposure Condition is considered, and when using the strap, only limb exposure Condition is considered.</li><li>4. The device has two straps, one is with Rubber Band, and another one is with Metal Strap. We chose one with Rubber Band to perform full SAR testing, and considering the material of the strap, with Metal Strap are verified the difference with the Rubber Band.</li></ol>	



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)

Table with 3 columns: Whole-Body, Partial-Body, Hands, Wrists, Feet and Ankles. Values: 0.4, 8.0, 20.0

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

Table with 3 columns: Whole-Body, Partial-Body, Hands, Wrists, Feet and Ankles. Values: 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 ( $\rho$ ). 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)

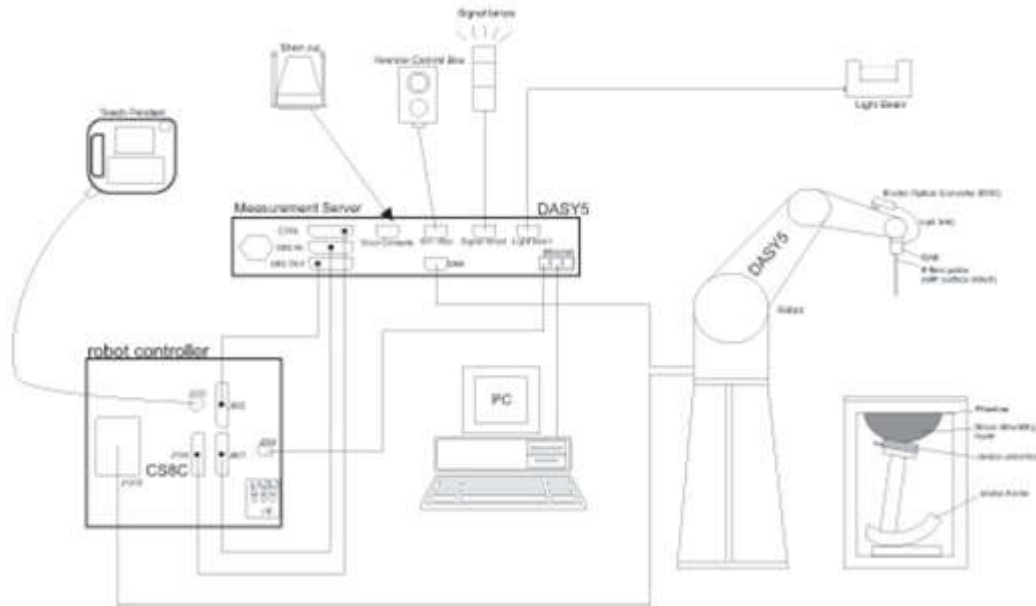
$$SAR = \frac{\sigma |E|^2}{\rho}$$

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  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.

**<ES3DV3 Probe>**

<b>Construction</b>	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
<b>Frequency</b>	10 MHz – 4 GHz; Linearity: ±0.2 dB (30 MHz – 4 GHz)	
<b>Directivity</b>	±0.2 dB in TSL (rotation around probe axis) ±0.3 dB in TSL (rotation normal to probe axis)	
<b>Dynamic Range</b>	5 µW/g – >100 mW/g; Linearity: ±0.2 dB	
<b>Dimensions</b>	Overall length: 337 mm (tip: 20 mm) Tip diameter: 3.9 mm (body: 12 mm) Distance from probe tip to dipole centers: 3.0 mm	

**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>**

<b>Shell Thickness</b>	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm
<b>Filling Volume</b>	Approx. 25 liters
<b>Dimensions</b>	Length: 1000 mm; Width: 500 mm; Height: adjustable feet
<b>Measurement Areas</b>	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>**

<b>Shell Thickness</b>	2 ± 0.2 mm (sagging: <1%)
<b>Filling Volume</b>	Approx. 30 liters
<b>Dimensions</b>	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 dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 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: $\Delta x_{Zoom}, \Delta y_{Zoom}$		$\leq 2$ GHz: $\leq 8$ mm 2 – 3 GHz: $\leq 5$ mm*	3 – 4 GHz: $\leq 5$ mm* 4 – 6 GHz: $\leq 4$ mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	$\leq 5$ mm	3 – 4 GHz: $\leq 4$ mm 4 – 5 GHz: $\leq 3$ mm 5 – 6 GHz: $\leq 2$ mm	
	graded grid	$\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4$ mm	3 – 4 GHz: $\leq 3$ mm 4 – 5 GHz: $\leq 2.5$ mm 5 – 6 GHz: $\leq 2$ 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	$\geq 30$ mm	3 – 4 GHz: $\geq 28$ mm 4 – 5 GHz: $\geq 25$ mm 5 – 6 GHz: $\geq 22$ mm	
Note: $\delta$ 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 $\leq 1.4$ W/kg, $\leq 8$ mm, $\leq 7$ mm and $\leq 5$ 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	2450MHz System Validation Kit	D2450V2	924	2020/9/2	2023/9/1
SPEAG	Data Acquisition Electronics	DAE4	1338	2021/12/1	2022/11/30
SPEAG	Dosimetric E-Field Probe	ES3DV3	3279	2021/8/24	2022/8/23
SPEAG	SAM Twin Phantom	SAM Twin	TP-1842	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Agilent	ENA Series Network Analyzer	E5071C	MY46106933	2021/7/31	2022/7/30
SPEAG	Dielectric Probe Kit	DAK-3.5	1138	2021/6/9	2022/6/8
Anritsu	Vector Signal Generator	MG3710A	6201682672	2022/1/6	2023/1/5
R&S	CBT BLUETOOTH TESTER	CBT	100641	2022/1/5	2023/1/4
EXA	Spectrum Analyzer	FSV7	101631	2021/10/14	2022/10/13
FLUKE	DIGITAC THERMOMETER	51II	97240029	2021/10/23	2022/10/22
Testo	Thermo-Hygrometer	608-H1	1241332126	2022/1/6	2023/1/5
ARRA	Power Divider	A3200-2	N/A	Note 1	
MCL	Attenuation1	BW-S10W5+	N/A	Note 1	
MCL	Attenuation2	BW-S10W5+	N/A	Note 1	
MCL	Attenuation3	BW-S10W5+	N/A	Note 1	
BONN	POWER AMPLIFIER	BLMA 0830-3	087193A	Note 1	
BONN	POWER AMPLIFIER	BLMA 2060-2	087193B	Note 1	
Agilent	Dual Directional Coupler	778D	20500	Note 1	
Agilent	Dual Directional Coupler	11691D	MY48151020	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 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 10.2 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 ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
For Head								
2450	55.0	0	0	0	0	45.0	1.80	39.2

#### **<Tissue Dielectric Parameter Check Results>**

Frequency (MHz)	Tissue Type	Liquid Temp. ( $^{\circ}\text{C}$ )	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	Conductivity Target ( $\sigma$ )	Permittivity Target ( $\epsilon_r$ )	Delta ( $\sigma$ ) (%)	Delta ( $\epsilon_r$ ) (%)	Limit (%)	Date
2450	Head	22.7	1.809	38.523	1.80	39.20	0.50	-1.73	$\pm 5$	2022/5/23

**10.3 System Performance Check Results**

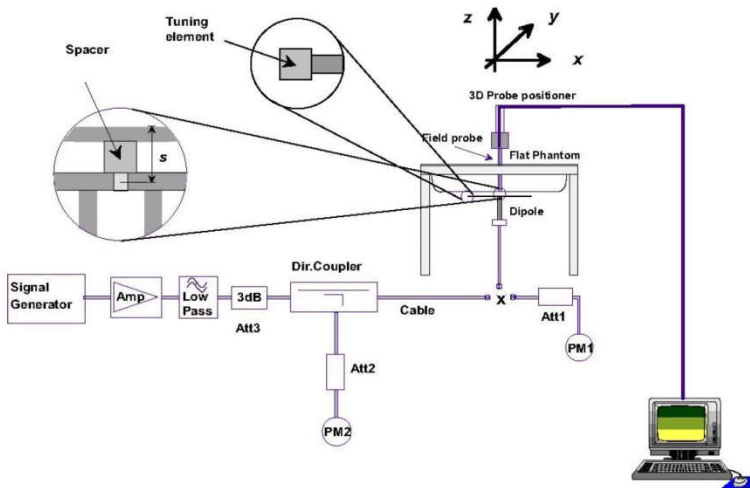
Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the 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 (%)
2022/5/23	2450	Head	50	924	3279	1338	2.560	51.40	51.2	-0.39

**<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 (%)
2022/5/23	2450	Head	50	924	3279	1338	1.230	24.00	24.6	2.50



**Fig 10.3.1 System Performance Check Setup**



**Fig 10.3.2 Setup Photo**



## **11. RF Exposure Positions**

### **11.1 Body 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.

- (a) The device shall be placed directly against the flat phantom, for those sides of the device that are in contact with the hand during intended use.
- (b) To adjust the device parallel to the flat phantom.
- (c) To adjust the distance between the device surface and the flat phantom to 0 cm.

#### **<EUT Setup Photos>**

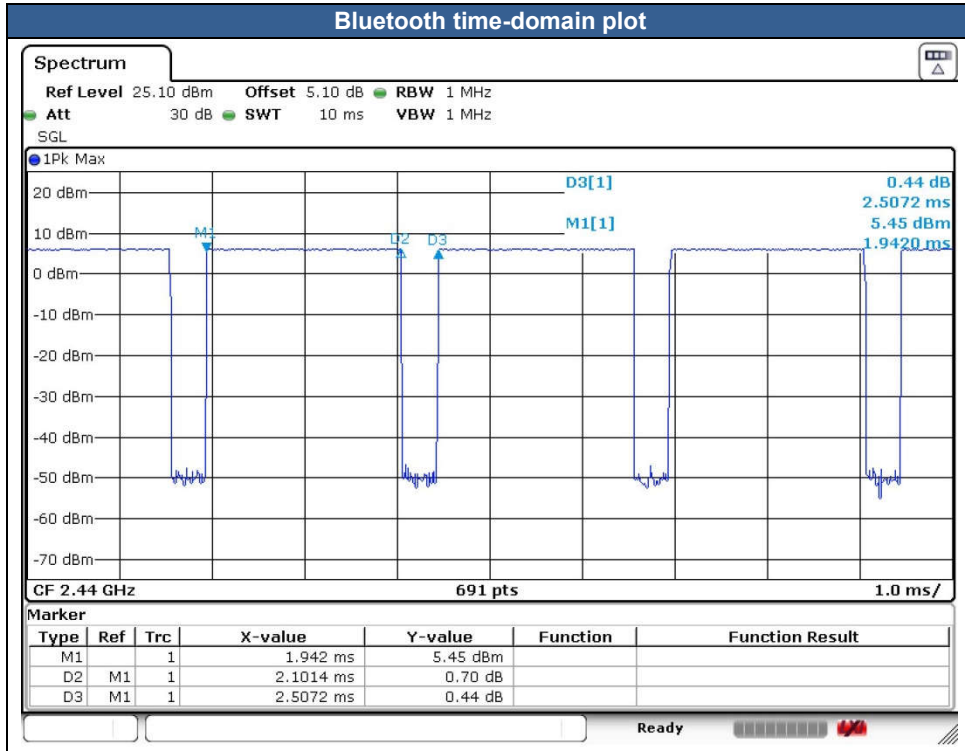
Please refer to the test setup photos.

## 12. Conducted RF Output Power (Unit: dBm)

### <Bluetooth Conducted Power>

**General Note:**

1. For Bluetooth SAR testing chose the mode with highest output power, which is 1Mbps at middle channel to test SAR and determine the worst configuration for further high/low channel testing.
2. The Bluetooth duty cycle is 83.81 %, Bluetooth SAR scaling need further consideration and the theoretical duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% of Bluetooth reported SAR calculation.



Mode	Channel	Frequency (MHz)	Average power (dBm)
LE_1M	CH 00	2402	2.72
	CH 19	2440	2.82
	CH 39	2480	2.94
Tune-up Limit			4.50

Mode	Channel	Frequency (MHz)	Average power (dBm)
LE_2M	CH 00	2402	2.78
	CH 19	2440	2.82
	CH 39	2480	2.86
Tune-up Limit			4.50



### **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 D04v01, 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 Bluetooth: Reported SAR(W/kg)= Measured SAR(W/kg)\* Duty Cycle scaling factor \* Tune-up scaling factor
2. Per KDB 447498 D04v01, 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:
  - $\leq 0.8$  W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
  - $\leq 0.6$  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
  - $\leq 0.4$  W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is  $\geq 0.8$ 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. This device will be equipped with the back clip pendant or Strap, the back clip pendant and one strap are a metallic wristband and do not contain any electronic circuitry.
5. When using the back clip, body exposure Condition is considered, and when using the strap, only limb exposure Condition is considered.
6. The device has two straps, one is with Rubber Band, and another one is with Metal Strap. We chose one with Rubber Band to perform full SAR testing, and considering the material of the strap, with Metal Strap are verified the difference with the Rubber Band.
7. When using the back clip, the EUT is inserted into the back clip with the antenna close to the right, as Clip-Ant Right mode, and the EUT is inserted upside down into the back clip with the antenna close to the left, as Clip-Ant left mode, chose Clip-Ant Right mode to perform full SAR testing, and Clip-Ant left mode are verified the difference with the Clip-Ant Right mode.

### 14.1 Body SAR

Plot No.	Band	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Accessory	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)
	Bluetooth	Back	0mm	0	2402	Clip-Ant Right	2.72	4.50	1.508	83.81	1.193	0.01	0.194	0.349
02	Bluetooth	Back	0mm	19	2440	Clip-Ant Right	2.82	4.50	1.473	83.81	1.193	-0.05	0.202	<b>0.355</b>
	Bluetooth	Back	0mm	39	2480	Clip-Ant Right	2.94	4.50	1.433	83.81	1.193	0.06	0.171	0.292
	Bluetooth	Back	0mm	19	2440	Clip-Ant Left	2.82	4.50	1.473	83.81	1.193	-0.17	0.092	0.162

### 14.2 Extremity SAR

Plot No.	Band	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Accessory	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)
01	Bluetooth	Back	0mm	0	2402	Rubber Band	2.72	4.50	1.508	83.81	1.193	0.17	0.183	<b>0.329</b>
	Bluetooth	Back	0mm	19	2440	Rubber Band	2.82	4.50	1.473	83.81	1.193	0.01	0.176	0.309
	Bluetooth	Back	0mm	39	2480	Rubber Band	2.94	4.50	1.433	83.81	1.193	0.06	0.151	0.258
	Bluetooth	Back	0mm	0	2402	Metal Strap	2.72	4.50	1.508	83.81	1.193	0.01	0.084	0.151



### 15. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations
1.	None

Note: Due to this device only supports Bluetooth Transmit antenna, so there is no need to evaluate the simultaneous transmission.

Test Engineer: Martin Li, Varus Wang, Light Wang

### 16. Uncertainty Assessment

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, when the highest 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 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 D04 v01, “Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies”, Nov 2021

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