

TEST REPORT

Applicant: Jiangmen Dascom Computer Peripherals Co., Ltd.

Address: No.399, Jin Xing Road, Jiang Hai District, Jiangmen

City, Guang Dong Province, P.R. China

Equipment Type: Portable receipt and label printer

Model Name: FP641 (refer to section 2.3)

Brand Name: TALLY/DASCOM, DASCOM, PRINTEK

FCC ID: Z70FP641

Test Standard: FCC 47 CFR Part 2.1093

(refer to section 3.1)

Maximum SAR: Extremity 2.4GHz(10 g@0mm): 0.09 W/kg

Sample Arrival Date: Sep. 18, 2023

Test Date: Oct. 07, 2023

Date of Issue: Oct. 16, 2023

ISSUED BY:

Shenzhen BALUN Technology Co., Ltd.

Tested by: Zhang Jiwei Checked by: Xu Rui Approved by: Tolan Tu

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Revision History

VersionIssue DateRevisions ContentRev. 01Oct. 11, 2023Initial IssueRev. 02Oct. 16, 2023Updated FCC IDAdded NFC test exclusion

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1 GENERAL INFORMATION

1.1 Test Laboratory

Name	Shenzhen BALUN Technology Co., Ltd.	
A ddroop	Block B, 1/F, Baisha Science and Technology Park, Shahe Xi Road,	
Address	Nanshan District, Shenzhen, Guangdong Province, P. R. China	
Phone Number	+86 755 6685 0100	

1.2 Test Location

Name	Shenzhen BALUN Technology Co., Ltd.	
	☑ Block B, 1/F, Baisha Science and Technology Park, Shahe Xi	
	Road, Nanshan District, Shenzhen, Guangdong Province, P. R.	
Location	China	
Location	☐ 1/F, Building B, Ganghongji High-tech Intelligent Industrial Park,	
	No. 1008, Songbai Road, Yangguang Community, Xili Sub-district,	
	Nanshan District, Shenzhen, Guangdong Province, P. R. China	
Accreditation	The laboratory is a testing organization accredited by FCC as a	
Certificate	accredited testing laboratory. The designation number is CN1196.	

1.3 Test Environment Condition

Ambient Temperature	18°C to 25°C
Ambient Relative	200/ to 700/
Humidity	30% to 70%



2 PRODUCT INFORMATION

2.1 Applicant Information

Applicant	Jiangmen Dascom Computer Peripherals Co., Ltd.
Addross	No.399, Jin Xing Road, Jiang Hai District, Jiangmen City, Guang
Address	Dong Province, P.R. China

2.2 Manufacturer Information

	Manufacturer	Jiangmen Dascom Computer Peripherals Co., Ltd.	
	A ddroop	No.399, Jin Xing Road, Jiang Hai District, Jiangmen City, Guang	
	Address	Dong Province, P.R. China	

2.3 General Description for Equipment under Test (EUT)

EUT Name	Portable receipt and label printer
Model Name Under Test	FP641
Series Model Name	DP-641
Description of Model Name Differentiation	All models are same with electrical parameters and internal circuit structure, but only differ in model name (this information provided by the applicant).
Hardware Version	N/A
Software Version	N/A
Dimensions (Approx.)	N/A
Weight (Approx.)	N/A

2.4 Ancillary Equipment

Note: Not application.

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2.5 Technical Information

Notwork and Wireless	Bluetooth (BR+EDR+BLE)
Network and Wireless	WIFI 802.11b, 802.11g, 802.11n(HT20/40)
connectivity	NFC

The requirement for the following technical information of the EUT was tested in this report:

Operating Mode	2.4G WLAN, Bluetooth		
Fraguency Banga	802.11b/g/n(HT20/HT40)	2412 MHz ~ 2462 MHz	
Frequency Range	Bluetooth	2402 MHz ~ 2480 MHz	
Antenna Type	Internal Antenna		
Hotspot Function	N/A		
Exposure Category	General Population/Uncontrolled exposure		
Product Type	Portable Device		
EUT Type		☐ Identical prototype	



3 SUMMARY OF TEST RESULT

3.1 Test Standards

No.	Identity	Document Title	
1	47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices	
2	ANSI/IEEE	IEEE Standard for Safety Levels with Respect to Human Exposure	
	Std.C95.1-1992	to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz	
3	FCC KDB 447498	447498 D04 Interim General RF Exposure Guidance v01	
3	D04 v01		
4	FCC KDB 865664	SAR Measurement 100 MHz to 6 GHz	
4	D01 v01r04		
5	FCC KDB 865664	RF Exposure Reporting	
5	D02 v01r02		
6	KDB 248227 D01	SAR Guidance for IEEE 802.11 (Wi-Fi) Transmitters	
0	v02r02		



3.2 Device Category and SAR Limit

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user.

Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

Table of Exposure Limits:

	SAR Value (W/Kg)		
Body Position	General Population/	Occupational/	
	Uncontrolled Exposure	ControlledExposure	
Whole-Body SAR	0.08	0.4	
(averaged over the entire body)	0.08	0.4	
Partial-Body SAR	1.60	8.0	
(averaged over any 1 gram of tissue)	1.00	8.0	
SAR for hands, wrists, feet and			
ankles	4.0	20.0	
(averaged over any 10 grams of tissue)			

NOTE:

General Population/Uncontrolled Exposure: Locations where there is the exposure of individuals who have no knowledge or control of their exposure. 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.

Occupational/Controlled Exposure: Locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, 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. This 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.

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3.3 Test Result Summary

3.3.1 Highest SAR (10 g Value)

Equipment Class	Band	Maximum Scaled SAR (W/kg)	Maximum Report SAR (W/kg)		
		Extremity (0mm)	Extremity (0mm)		
DTS	2.4G WLAN	0.09	0.00		
DSS	Bluetooth	0.03	0.09		
Limit (W/kg)	4.00			
Ver	dict	Pass			

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3.4 Test Uncertainty

According to KDB 865664 D01, when the highest measured 1 g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis is not required in SAR reports submitted for equipment approval.

The maximum 10 g SAR for the EUT in this report is 0.09 W/kg, which is lower than 3.75 W/kg, so the extensive SAR measurement uncertainty analysis is not required in this report.



4 MEASUREMENT SYSTEM

4.1 Specific Absorption Rate (SAR) Definition

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

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

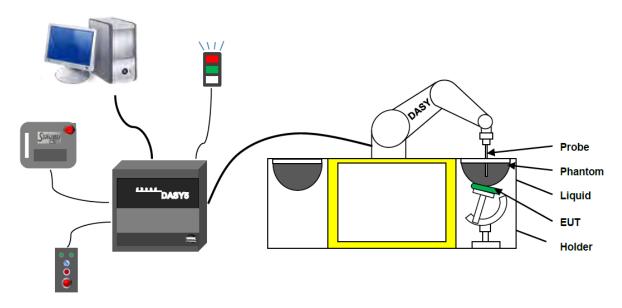
Where: σ is the conductivity of the tissue,

pis the mass density of the tissue and E is the RMS electrical field strength.



4.2 DASY SAR System

4.2.1 DASY SAR System Diagram



The DASY5 system for performing compliance tests consists of the following items:

- 1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).
- 2. A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, ADconversion, 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.
- 4. A unit to operate the optical surface detector which is connected to the EOC.
- 5. The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.
- 6. The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation.
- 7. DASY5 software and SEMCAD data evaluation software.
- 8. Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
- 9. The generic twin phantom enabling the testing of left-hand and right-hand usage.
- 10. The device holder for handheld mobile phones.
- 11. Tissue simulating liquid mixed according to the given recipes.
- 12. System validation dipoles allowing to validate the proper functioning of the system.



4.2.2 Robot

The Dasy SAR system uses the high precision robots. Symmetrical design with triangular core Built-in optical fiber for surface detection system For the 6-axis controller system, Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents). The robot series have many features that are important for our application:



- High precision (repeatability ±0.02 mm)
- High reliability (industrial design)
- Low maintenance costs
 (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements (brush less synchron motors; no stepper motors)
- Low ELF interference (motor control _elds shielded via the closed metallic construction shields)



4.2.3 E-Field Probe

The probe is specially designed and calibrated for use in liquids with high permittivities for the measurements the Specific Dosimetric E-Field Probe EX3DV4-SN: 7510 with following specifications is used.

Construction Symmetrical design with triangular core Built-in optical fiber for surface detection

systemBuilt-in shielding against static charges PEEK enclosure material (resistant to

organic solvents, e.g., glycolether)

Calibration ISO/IEC 17025 calibration service available

Frequency 10 MHz to 6 GHz; Linearity: ± 0.2 dB (30 MHz to 6 GHz)

Directivity ± 0.2 dB in HSL (rotation around probe axis); ± 0.4 dB in HSL (rotation normal to probe

axis)

Dynamic range $5 \mu W/g$ to > 100 mW/g; Linearity: $\pm 0.2 dB$

Dimensions Overall length: 337 mm (Tip: 9 mm) Tip diameter: 2.5 mm (Body: 10 mm) Distance from

probe tip to dipole centers: 1.0 mm

Application General dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic

scanning in arbitrary phantoms (EX3DV4)



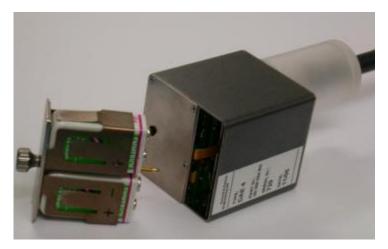
E-Field Probe Calibration Process

Probe calibration is realized, in compliance with CENELEC EN 62209-1/-2 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 62209-1/2 annexe technique using reference guide at the five frequencies.



4.2.4 Data Acquisition Electronics

The data acquisition electronics (DAE) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converte and a command decoder with a 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.



- Input Impedance: 200MOhm
- The Inputs: Symmetrical and Floating
- Commom Mode Rejection: Above 80dB



4.2.5 Phantoms

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



- ·Left hand
- ·Right hand
- ·Flat phantom

Photo of Phantom SN1402



Serial Number	Material	Length	Height
SN 1402 SAM	Vinylester, glass fiber reinforced	1000	500



4.2.6 Device Holder

The DASY5 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. 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. This device holder is used for standard mobile phones or PDA"s only. If necessary an additional support of polystyrene material is used. Larger DUT's (e.g. notebooks) cannot be tested using this device holder. Instead a support of bigger polystyrene cubes and thin polystyrene plates is used to position the DUT in all relevant positions to find and measure spots with maximum SAR values. Therefore those devices are normally only tested at the flat part of the SAM.



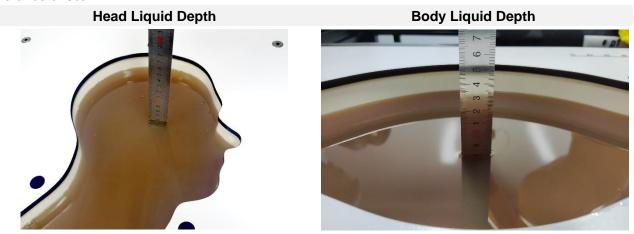
The positioning system allows obtaining cheek and tilting position with a very good accuracy. Incompliance with CENELEC, the tilt angle uncertainty is lower than 1°.

Add: Block B, 1/F, Baisha Science and Technology Park, Shahe Xi Road, Nanshan District, Shenzhen, Guangdong Province, P. R. China



4.2.7 Simulating Liquid

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%.



The following table gives the recipes for tissue simulating liquid.

TSL	Manufacturer / Model	Freq Range (MHz)	Main Ingredients
Head WideBand	SPEAG HBBL600- 10000V6	600-10000	Ethanediol, Sodium petroleum sulfonate, Hexylene Glycol / 2-Methyl-pentane-2.4- diol, Alkoxylated alcohol



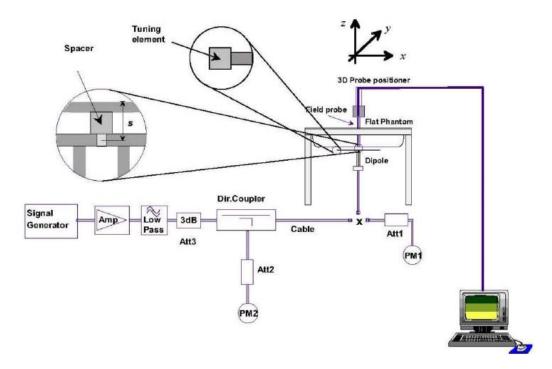
5 SYSTEM VERIFICATION

5.1 Purpose of System Check

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

5.2 System Check Setup

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





6 TEST POSITION CONFIGURATIONS

6.1 Product Specific 10g Exposure Consideration

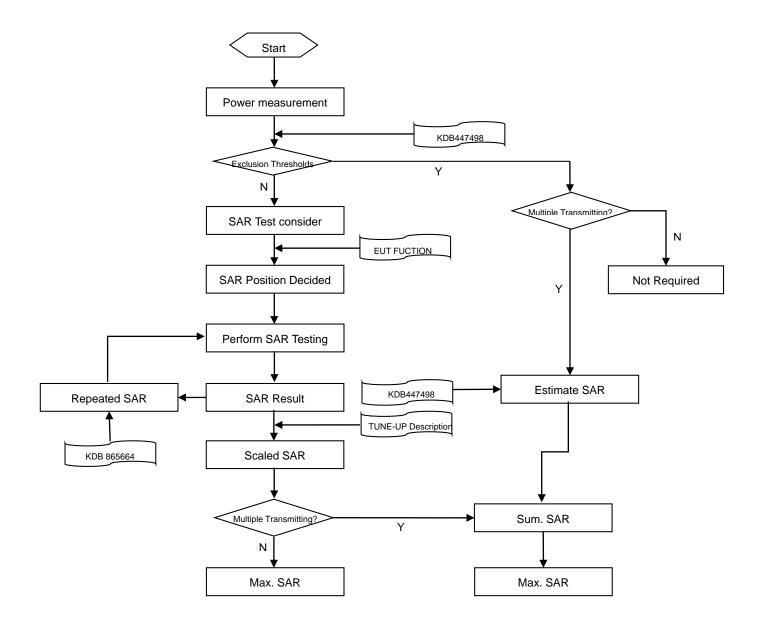
According with FCC KDB 648474 D04, for smart phones with a display diagonal dimension > 15.0 cm or an overall diagonal dimension > 16.0 cm that provide similar mobile web access and multimedia support found in mini-tablets or UMPC mini-tablets that support voice calls next to the ear, unless it is confirmed otherwise through KDB inquiries, the following phablet procedures should be applied to evaluate SAR compliance for each applicable wireless modes and frequency band. Devices marketed as phablets, regardless of form factors and operating characteristics must be tested as a phablet to determine SAR compliance;

The UMPC mini-tablet procedures must also be applied to test the SAR of all surfaces and edges with an antenna located at \leq 25 mm from that surface or edge, in direct contact with a flat phantom, for 10-g extremity SAR according to the body-equivalent tissue dielectric parameters in KDB 865664 to address interactive hand use exposure conditions. The UMPC mini-tablet 1-g SAR at 5 mm is not required. When hotspot mode applies, 10-g extremity SAR is required only for the surfaces and edges with hotspot mode 1-g reported SAR > 1.2 W/kg.



MEASUREMENT PROCEDURE

7.1 Measurement Process Diagram





7.2 SAR Scan General Requirement

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Boththe probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1 g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std 1528-2013.

			≤3GHz	>3GHz	
Maximum distance from		•	5±1 mm	½·δ·ln(2)±0.5 mm	
(geometric center of prob Maximum probe angle fro normal at the measurement	om probe ax		30°±1° 20°±1°		
Maximum area scan spat	iial resolution	n: Δx Area , Δy Area	$ \leq 2 \text{ GHz:} \leq 15 \text{ mm} \\ 2-3 \text{ GHz:} \leq 12 \text{ mm} \\ 4-6 \text{ GHz:} \leq 10 \text{ mm} \\ \\ \text{When the x or y dimension of the test device, in the} \\ \text{measurement plane orientation, is smaller than the above,} \\ \text{the measurement resolution must be } \leq \text{the corresponding x or} \\ \text{y dimension of the test device with at least one measurement} $		
Maximum zoom scan spatial resolution: Δx Zoom , Δy Zoom			point on the test device. $ \leq 2 \text{ GHz: } \leq 8 \text{ mm} \qquad \qquad 3-4 \text{ GHz: } \leq 5 \text{ mm*} $ $ 2-3 \text{ GHz: } \leq 5 \text{ mm*} \qquad \qquad 4-6 \text{ GHz: } \leq 4 \text{ mm*} $ $ 3-4 \text{ GHz: } \leq 4 \text{ mm} $		
	unifor	m grid: Δz Zoom (n)	≤ 5 mm	4–5 GHz: ≤ 3 mm 5–6 GHz: ≤ 2 mm	
Maximum zoom scan spatial resolution, normal to phantom surface	olution, nantom	Δz Zoom (1): between 1st two points closest to phantom surface	≤ 4 mm	3–4 GHz: ≤ 3 mm 4–5 GHz: ≤ 2.5 mm 5–6 GHz: ≤ 2 mm	
grid Δz Zoom (n>1): between subsequent points		≤ 1.5·Δz Zoom (n-1)			
Minimum zoom x, y, z scan volume			≥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 reported SAR from the area scan based 1 g SAR estimation 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 3GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

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7.3 Measurement Procedure

The following steps are used for each test position

- a. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface
- b. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
- c. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
- d. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 *32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

7.4 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. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r04 quoted below.

When the 1 g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.



CONDUCTED RF OUPUT POWER

8.1 WIFI

8.1.1 2.4G WIFI

Band	Mada	Chamal	Freq.	Conducted	Tune-up Power	SAR Test
(GHz)	Mode	Channel	(MHz)	Power (dBm)	Limit (dBm)	Require.
		1	2412	21.25	22.00	Yes
	802.11b	6	2437	20.75	22.00	Yes
		11	2462	20.52	22.00	Yes
		1	2412	23.04	23.50	No
	802.11g	6	2437	22.52	23.50	No
2.4		11	2462	22.22	23.50	No
(2.4~2.4835)		1	2412	22.63	23.50	No
	802.11n(HT20)	6	2437	22.19	23.50	No
		11	2462	21.88	23.50	No
		3	2422	22.58	23.50	No
	802.11n(HT40)	6	2437	22.39	23.50	No
<u></u>	-	9	2452	22.15	23.50	No

Note: According KDB 248227 D01 SAR is not required for the following 2.4 GHz OFDM conditions. 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. when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

Adjusted SAR = Report SAR * (max power (OFDM)/ max power (DSSS)) = 0.086 * (223.87 mw)/(158.49 mw) = 0.121 W/kg, so the 2.4GHz OFDM SAR test is not required.



8.2 Bluetooth

Mode		GFSK		π/4-DQPSK			
Channel	0	39	78	0	39	78	
Frequency (MHz)	2402	2441	2480	2402	2441	2480	
Conducted Power (dBm)	4.41	3.80	3.72	3.31	2.60	2.38	
Tune-Up Limit (dBm)	5.00	5.00	5.00	4.00	4.00	4.00	
SAR Test Require	Yes	Yes	Yes	No	No	No	
Mode		8-DPSK			/		
Channel	0	39	78	/	/	/	
Frequency (MHz)	2402	2441	2480	/	/	/	
Conducted Power (dBm)	3.67	2.89	2.81	/	/	/	
Tune-Up Limit (dBm)	4.00	4.00	4.00	/	/	/	
SAR Test Require	No	No	No	/	/	/	
Mode		BLE-1Mbps			BLE-2Mbps		
Channel	0	19	39	0	19	39	
Frequency (MHz)	2402	2440	2480	2402	2440	2480	
Conducted Power (dBm)	4.31	3.81	3.63	4.46	4.00	3.84	
Tune-Up Limit (dBm)	5.00	5.00	5.00	5.00	5.00	5.00	
SAR Test Require	No	No	No	No	No	No	

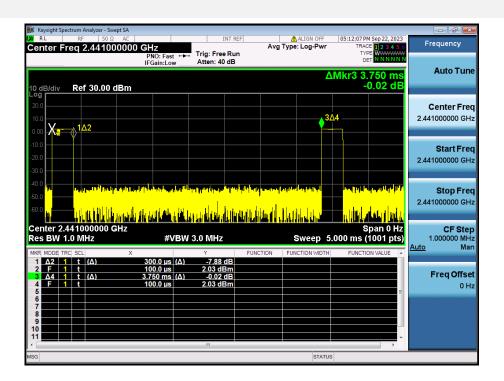
Note: Since Bluetooth BR mode is the maximum output power mode, SAR measurements were performed with test software using DH5 modulation, and SAR measurement is not required for the EDR and LE. When the secondary mode is ≤ $^{1\!\!/_{\!\!4}}$ dB higher than the primary mode.



Duty Cycle

Note: The Bluetooth duty DH5 cycle is 8%,as following figure, according to 2016 Oct. TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation.

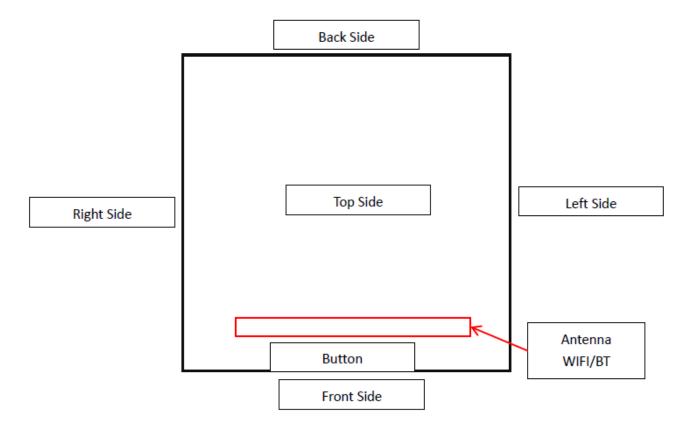
GFSK





9 TEST EXCLUSION CONSIDERATION

9.1 Antenna location sketch





9.2 SAR Test Consideration Table

According with FCC KDB 447498 D04, Appendix B, The SAR-based exemption formula applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold Pth (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). The following table shows the power threshold from 5mm to 50mm.

		Power Thres	sholds (mW)		
Fraguency	At separation				
Frequency	distance of				
(MHz)	≤5 mm	10 mm	15 mm	20 mm	25 mm
300	39 mW	65 mW	88 mW	110 mW	129 mW
450	22 mW	44 mW	67 mW	89 mW	112 mW
835	9 mW	25 mW	44 mW	66 mW	90 mW
1900	3 mW	12 mW	26 mW	44 mW	66 mW
2450	3 mW	10 mW	22 mW	38 mW	59 mW
3600	2 mW	8 mW	18 mW	32 mW	49 mW
5800	1 mW	6 mW	14 mW	25 mW	40 mW
	At separation				
Frequency	distance of				
(MHz)	30 mm	35 mm	40 mm	45 mm	50 mm
300	148 mW	166 mW	184 mW	201 mW	217 mW
450	135 mW	158 mW	180 mW	203 mW	226 mW
835	116 mW	145 mW	175 mW	207 mW	240 mW
1900	92 mW	122 mW	157 mW	195 mW	236 mW
2450	83 mW	111 mW	143 mW	179 mW	219 mW
3600	71 mW	96 mW	125 mW	158 mW	195 mW
5800	58 mW	80 mW	106 mW	136 mW	169 mW



This host is a notebook computer, under normal use the RF exposure scenarios are shown in the table below:

RF exposure Position	RF exposure scenarios
Front Side	Extremity
Back Side	Extremity
Left Side	Extremity
Right Side	Extremity
Top Side	Extremity
Bottom Side	Extremity

Extremity RF exposure scenarios

Positon	Mode	Calculated Frequency (Ghz)	Distance to User (mm)	Exclusion Threshold (mW)	Max. Peak Power (dBm)	Max. Peak Power (mW)	SAR Test Required
Front Side	DTS	2.462	10	10.22	23.50	223.87	Yes
Fiorit Side	DSS	2.48	10	10.17	5.00	3.16	Yes
Book Cido	DTS	2.462	90	669.44	23.50	223.87	Yes
Back Side	DSS	2.48	90	668.59	5.00	3.16	Yes
Left Side	DTS	2.462	30	82.73	23.50	223.87	Yes
Left Side	DSS	2.48	30	82.48	5.00	3.16	Yes
Right Side	DTS	2.462	30	82.73	23.50	223.87	Yes
Right Side	DSS	2.48	30	82.48	5.00	3.16	Yes
Tan Cida	DTS	2.462	10	10.22	23.50	223.87	Yes
Top Side	DSS	2.48	10	10.17	5.00	3.16	Yes
Bottom Side	DTS	2.462	40	143.03	23.50	223.87	Yes
Bottom Side	DSS	2.48	40	142.67	5.00	3.16	Yes



Note:

- Maximum power is the source-based time-average power and represents the maximum RF output power including tuneup tolerance among production units
- 2. Per KDB 447498 D04, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
- Per KDB 447498 D04, standalone SAR test exclusion threshold is applied; If the distance of the antenna to the user is
 5mm, 5mm is used to determine SAR exclusion threshold
- 4. Per KDB 447498 D04, for separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive), the threshold Pth (mW) is given by Following:

$$P_{th}(mW) = \begin{cases} ERP_{20cm}(d/20cm)^x & d \le 20cm \\ ERP_{20cm} & 20cm < d \le 40cm \end{cases}$$

where

$$x = -log_{10} \left(\frac{60}{ERP_{20cm} \sqrt{f}} \right)$$

- a. f(GHz) is the RF channel transmit frequency in GHz
- b. d is the separation distance (cm), The result is rounded to one decimal place for comparison
- c. ERP_{20cm} are determined by:

$$ERP_{20cm}(mW) = f(x) = \begin{cases} 2040f & 0.3GHz \le f < 1.5GHz \\ 3060 & 1.5GHz \le f \le 6GHz \end{cases}$$

- 5. Per KDB 248227 D01, choose the highest output power channel to test SAR and determine further SAR exclusion.8. For each frequency band, testing at higher data rates and higher order modulations is not required when the maximum average output power for each of these configurations is less than 1/4dB higher than those measured at the lowest data rate
- 6. Per KDB 248227 D01 SAR is not required for the following 2.4 GHz OFDM conditions.
 - a. When KDB Publication 447498 D04 SAR test exclusion applies to the OFDM configuration.
 - b. 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 \leq 1.2 W/kg.



10 TEST RESULT

10.1 WIFI 2.4GHz

Mode	Position	Dist. (mm)	Ch.	Freq. (MHz)	Power Drift (dB)	10g Meas SAR (W/kg)	Meas. Power (dBm)	Max. tune-up power (dBm)	Scaling Factor	Duty cycle (%)	Duty cycle Factor	10g Scaled SAR (W/kg)	Meas. No.
Extremity													
	Front Side	0	1	2412	0.16	0.062	21.25	22.00	1.189	92.50	1.081	0.080	/
	Back Side	0	1	2412	0.00	0.001	21.25	22.00	1.189	92.50	1.081	0.001	/
	Left Side	0	1	2412	-0.14	0.017	21.25	22.00	1.189	92.50	1.081	0.022	/
802.11b	Right Side	0	1	2412	-0.12	0.006	21.25	22.00	1.189	92.50	1.081	0.008	/
002.110	Top Side	0	1	2412	0.02	0.067	21.25	22.00	1.189	92.50	1.081	0.086	1#
	Bottom Side	0	1	2412	-0.05	0.003	21.25	22.00	1.189	92.50	1.081	0.004	/
	Top Side	0	6	2437	-0.04	0.059	20.75	22.00	1.334	92.50	1.081	0.085	/
	Top Side	0	11	2462	-0.15	0.045	20.52	22.00	1.406	92.50	1.081	0.068	/
Note: Refer to	ANNEX C for the	detailed tes	t data for ea	ach test conf	figuration.						·	·	

10.2Bluetooth

Mode	Position	Dist. (mm)	Ch.	Freq. (MHz)	Power Drift (dB)	10g Meas SAR (W/kg)	Meas. Power (dBm)	Max. tune-up power (dBm)	Scaling Factor	Duty cycle (%)	Duty cycle Factor	10g Scaled SAR (W/kg)	Meas. No.
Extremity	1			ı	1	ı	ı	1	1		ı	ı	
	Front Side	0	0	2402	-0.06	0.001	4.41	5.00	1.146	8.00	12.500	0.014	/
	Back Side	0	0	2402	0.10	0.000	4.41	5.00	1.146	8.00	12.500	0.000	/
	Left Side	0	0	2402	0.14	0.000	4.41	5.00	1.146	8.00	12.500	0.000	/
DUE	Right Side	0	0	2402	0.05	0.000	4.41	5.00	1.146	8.00	12.500	0.000	/
DH5	Top Side	0	0	2402	0.13	0.002	4.41	5.00	1.146	8.00	12.500	0.029	2#
	Bottom Side	0	0	2402	-0.09	0.000	4.41	5.00	1.146	8.00	12.500	0.000	/
	Top Side	0	39	2441	0.11	0.001	3.80	5.00	1.318	8.00	12.500	0.016	/
	Top Side	0	78	2480	0.19	0.001	3.72	5.00	1.343	8.00	12.500	0.017	/
Note: Refer to	ANNEX C for the	detailed tes	t data for ea	ach test con	figuration.	•	•	•			•		



11 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10, the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR repeated measurement procedure:

- 1. When the highest measured SAR is < 0.80 W/kg, repeated measurement is not required.
- 2. When the highest measured SAR is >= 0.80 W/kg, repeat that measurement once.
- 3. If the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20, or when the original or repeated measurement is >= 1.45 W/kg, perform a second repeated measurement.
- 4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20, and the original, first or second repeated measurement is >= 1.5 W/kg, perform a third repeated measurement.

Note: For product specific 10g SAR, the highest measured 10g SAR is 0.067 < 2.0 W/kg, repeated measurement is not required.

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12 SIMULTANEOUS TRANSMISSION

Note: This product has only one antenna for WLAN and Bluetooth, WLAN and Bluetooth antenna can't simultaneous transmission at same time, so simultaneous transmission evaluation is not required in this report.



12.1 NFC SAR test instructions

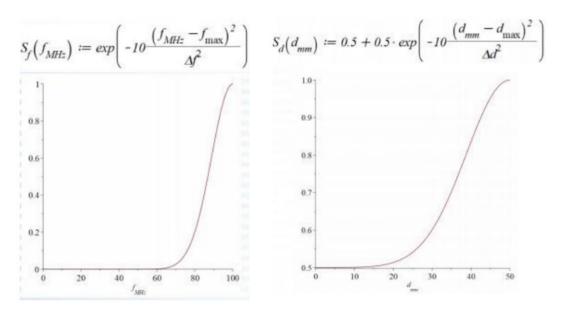
1.1 According to the 2022.04 TCBC Workshop meeting, the power threshold is ≤ 100MHz, refer to P6s.

$$P_{7X}(d_{mm}, f_{MHz}) := \begin{cases} P_{6S}(d_{mm}, f_{MHz}) & f_{MHz} \leq 100 \\ P_{6to7}(d_{mm}, f_{MHz}) & 100 < f_{MHz} \leq 300 \\ P_{7}(d_{mm}, f_{MHz}) & 300 < f_{MHz} \end{cases}$$

1.2 For portable products, when using a distance of ≤ 50mm, such as mobile phone NFC, P6s is calculated with the following formula calculate.

$$S_{f}\!\left(f_{M\!Hz}\right) \cdot P_{431a}\!\left(d_{mm'}f_{M\!Hz}\right) + \left(1 - S_{f}\!\left(f_{M\!Hz}\right)\right) \cdot S_{d}\!\left(d_{mm}\right) P_{431b1}\!\left(50.,\ 100.\right) \\ \cdot \left(1. + \log 10\!\left(\frac{100.}{f_{M\!Hz}}\right)\right) \\ d_{mm} \leq 50 \text{ and } f_{M\!Hz} \leq 1000 \cdot \left(1. + \log 10\right) \cdot$$

1.3 The smoothing functions Sf and Sd in P6s calculate the limits based on KDB 447498 V06 and are calculated as follows.



d≤50mm									
f Max(MHz)	100	100 d Max(mm) 50							
f MHz	13.56	d(mm)	5						
△f(MHz)	100	100 △d 50							
S _f (f _{MHz})	0.000568861	S _d (dmm)	0.50015177						
P6s(mW) 443.1257378									
Note: SAR testing is re	quired when the distance is 5	5mm and the power	is greater than 443.13mW.						



2. According to the ANSI C63.10 clause 11.12.2.2:

The value of maximum peak output power is according to the method described in ANSI C63.10 clause 11.12.2.2 General procedure for conducted measurements in restricted bands:

- a) Measure the conducted output power (in dBm) using the detector specified (see guidance regarding measurement procedures for determining quasi-peak, peak, and average conducted output power, respectively).
- b) Add the maximum transmit antenna gain (in dBi) to the measured output power level to determine the ERP level (see guidance on determining the applicable antenna gain)
- c) Add the appropriate maximum ground reflection factor to the EIRP level (6 dB for frequencies ≤ 30 MHz, 4.7 dB for frequencies between 30 MHz and 1000 MHz, inclusive and 0 dB for frequencies > 1000 MHz).
- d) For devices with multiple antenna-ports, measure the power of each individual chain and sum the ERP of all chains in linear terms (e.g., Watts, mW).
- e) Convert the resultant ERP level to an equivalent electric field strength using the following relationship: E = EIRP 20log D + 104.8

where:

 $E = electric field strength in dB\mu V/m$,

ERP = equivalent isotropic radiated power in dBm

D = specified measurement distance in meters.

Mode	f (MHz)	f (MHz) Max. E-Field strength (dBuV/m)		Ground reflection factor (dB)	EIRP (dBm)
NFC (13.56MHz)	13.56	64.25	3	6	-25.01

Note:

2.EIRP= 64.25+20*Log(3) - 104.8 + 6 =-25.01 (dBm)

According to the FCC KDB 447498 D04

Estimated SAR: SAR test =1.6 · Pant / Pth [W/kg]

Estimated SAR	1.6 ·Pant / Pth [W/kg]				
Pmeas.(dBm)	-25.01	-25.01 Pmeas.(mW)			
Pth.(mW)	443.13				
NFC Estimated 1g SAR [W/kg]	< 0.001				

^{1.} Add the appropriate maximum ground reflection factor to the EIRP level (6 dB for frequencies \leq 30 MHz).



Results:

- 1. The NFC power is -25.01dBm, the power threshold is P6s=443.13mW, Therefore, the NFC SAR test is excluded.
- 2. NFC multi-transmit requires the use of the TER formula:

$$TER = \sum_{k=1}^{N_s} \left(\frac{SAR_k}{SAR_{\lim}} \right) + \sum_{k=1}^{N_f} \left(\frac{MPE_{field, k}}{MPE_{field, \lim}} \right)^2 + \sum_{k=1}^{N_{PD}} \left(\frac{MPE_{PD, k}}{MPE_{PD, \lim}} \right)$$

The maximum SAR value for WLAN and BT is 0.086 [W/kg], SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds. Therefore, the worst TER =(0.086+0.001)/4.0 = 0.022 < 1, the NFC SAR transmit simultaneously Pass.



13 TEST EQUIPMENTS LIST

Description	Manufacturer	Model	Serial No./Version	Cal. Date	Cal. Due
PC	Dell	N/A	N/A	N/A	N/A
Test Software	Speag	DASY5	52.8.8.1222	N/A	N/A
2450MHz Validation Dipole	Speag	D2450V2	SN: 952	2021/05/19	2024/05/18
E-Field Probe	Speag	EX3DV4 SN: 7510		2023/01/19	2024/01/18
Data Acquisition Electronicsr	Speag	DAE4	SN: 1710	2023/01/30	2024/01/29
Signal Generator	R&S	SMB100A	177746	2023/05/10	2024/05/09
Power Meter	R&S	NRVD-B2	835843/014	2023/09/05	2024/09/04
Power Sensor	R&S	NRV-Z4	100381	2023/09/05	2024/09/04
Power Sensor	R&S	NRV-Z2	100211	2023/09/05	2024/09/04
Network Analyzer	Agilent	E5071C	MY46103472	2022/12/06	2023/12/05
Thermometer	Elitech	RC-4HC	EF720B004811	2022/11/25	2023/11/24
Thermometer	Elitech	RC-4HC	EF720B004817	2022/11/18	2023/11/17
Power Amplifier	SATIMO	6552B	22374	N/A	N/A
Dielectric Probe Kit	Speag	DAK3.5	SN: 1312	N/A	N/A
Phantom	Speag	SAM	SN: 1402	N/A	N/A
Attenuator	COM-MW	ZA-S1-31	1305003187	N/A	N/A
Directional coupler	AA-MCS	AAMCS-UDC	000272	N/A	N/A

Note: For dipole antennas, BALUN has adopted 3 years as calibration intervals, and on annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

- 1. There is no physical damage on the dipole;
- 2. System validation with specific dipole is within 10% of calibrated value;
- 3. Return-loss in within 20% of calibrated measurement.
- 4. Impedance (real or imaginary parts) in within 5 Ohms of calibrated measurement.



ANNEX A SIMULATING LIQUID VERIFICATION RESULT

The dielectric parameters of the liquids were verified prior to the SAR evaluation using a DAK3.5 Dielectric Probe Kit.

Date	Liquid Type	Fre. (MHz)	Temp. (°C)	Meas. Conductivity (σ) (S/m)	Meas. Permittivity (ε)	Target Conductivity (σ) (S/m)	Target Permittivity (ε)	Conductivity Tolerance (%)	Permittivity Tolerance (%)
2023.10.07	Head	2450	21.5	1.83	39.28	1.80	39.20	1.67	0.20
Note: The tolerance limit of Conductivity and Permittivity is± 5%.									

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ANNEX B SYSTEM CHECK RESULT

Comparing to the original SAR value provided by SPEAG, the validation data should be within its specification of 10 %(for 10 g).

Date	Liquid	Freq.	Power	Measured	Normalized	Dipole SAR	Tolerance		
	Туре	(MHz)	(mW)	SAR (W/kg)	SAR (W/kg)	(W/kg)	(%)		
2023.10.07 Head 2450 100 2.36 23.60						24.10	-2.07		
Note: The tolerance limit of System validation ±10%.									



System Performance Check Data (2450MHz)

Date: 2023.10.07

Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz; Duty Cycle: 1:1 Medium parameters used: f = 2450 MHz; $\sigma = 1.831$ S/m; $\varepsilon_r = 39.281$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Ambient Temperature:22.1°C Liquid Temperature:21.5°C

DASY5 Configuration:

- Probe: EX3DV4 SN7510; ConvF(7.78, 7.78, 7.78); Calibrated: 2023.01.19;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1710; Calibrated: 2023.01.30
- Phantom: SAM Left 1402; Serial: TP1402
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

CW 2450 100mW/Area Scan (101x101x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm Maximum value of SAR (interpolated) = 6.58 W/kg

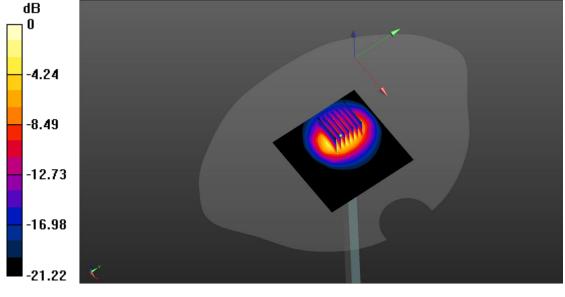
CW 2450 100mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 51.23 V/m; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 11.3 W/kg

SAR(1 g) = 5.43 W/kg; SAR(10 g) = 2.36 W/kg

Maximum value of SAR (measured) = 6.56 W/kg



0 dB = 6.56 W/kg



ANNEX C TEST DATA

Meas.1 Extremity Plane with Top Side 0mm on 1 Channel in IEEE802.b mode

Date: 2023.10.07

Communication System Band: WLAN(b); Frequency: 2412 MHz; Duty Cycle: 1:1.081

Medium parameters used (interpolated): f = 2412 MHz; σ = 1.783 S/m; ϵ_r = 39.835; ρ = 1000 kg/m³

Phantom section: Flat Section

Ambient Temperature:22.1°C Liquid Temperature:21.5°C

DASY5 Configuration:

Probe: EX3DV4 - SN7510; ConvF(7.78, 7.78, 7.78); Calibrated: 2023.01.19;

• Sensor-Surface: 4mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn1710; Calibrated: 2023.01.30

Phantom: SAM Left 1402; Serial: TP1402

Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Ch1/Area Scan (91x141x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 0.189 W/kg

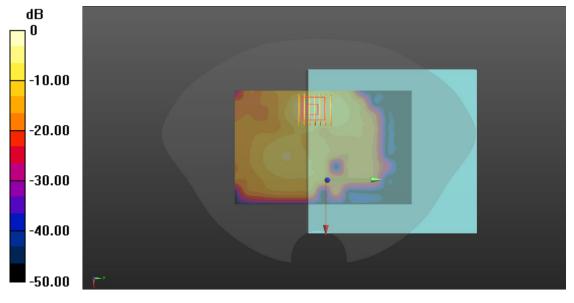
Ch1/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 1.778 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 0.306 W/kg

SAR(1 g) = 0.149 W/kg; SAR(10 g) = 0.067 W/kg

Maximum value of SAR (measured) = 0.171 W/kg



0 dB = 0.171 W/kg



Meas.2 Extremity Plane with Top Side 0mm on 0 Channel in Bluetooth mode

Date: 2023.10.07

Communication System Band: BT; Frequency: 2402 MHz; Duty Cycle: 1:12.5

Medium parameters used (interpolated): f = 2402 MHz; σ = 1.772 S/m; ϵ_r = 39.915; ρ = 1000 kg/m³

Phantom section: Flat Section

Ambient Temperature:22.1 °C Liquid Temperature:21.5 °C

DASY5 Configuration:

Probe: EX3DV4 - SN7510; ConvF(7.78, 7.78, 7.78); Calibrated: 2023.01.19;

Sensor-Surface: 4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1710; Calibrated: 2023.01.30

Phantom: SAM Left 1402; Serial: TP1402

Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

Ch0/Area Scan (101x141x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 0.0192 W/kg

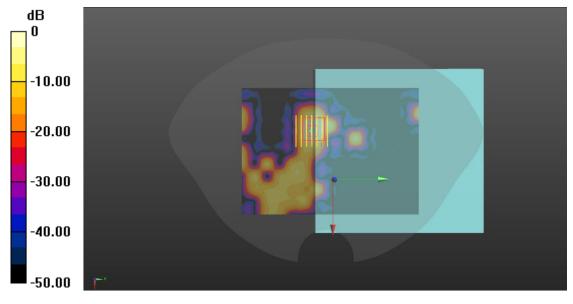
Ch0/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 0 V/m; Power Drift = 0.13 dB

Peak SAR (extrapolated) = 0.0140 W/kg

SAR(1 g) = 0.00601 W/kg; SAR(10 g) = 0.00207 W/kg

Maximum value of SAR (measured) = 0.0075 W/kg



0 dB = 0.0075 W/kg



ANNEX D SAR TEST SETUP PHOTOS

Please refer the document "BL-SZ2390686-AS.pdf".

ANNEX E CALIBRATION REPORT

Please refer the document "BL-SZ2390686-AC-1.pdf".

ANNEX F TUNE-UP PROCEDURE

Please refer the document "BL-SZ2390686-AT.pdf".



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