

FCC SAR TEST REPORT

FCC ID : 2AP4W-ALITE
Equipment : mPERS
Brand Name : Belle
Model Name : Belle X ATT
Marketing Name : Belle X
Applicant : Freeus, LLC
640 W 1100 S, Suite 4, Ogden, Utah, United States 84404
Manufacturer : WiBASE Industrial Solutions Inc.
Bldg. G, 17F, No. 3-1, Yuan Qu St., Nan Gang Dist., Taipei City,
115, Taiwan.
Standard : FCC 47 CFR Part 2 (2.1093)

The product was received on Aug 27, 2019 and testing was started from Jul 29, 2021 and completed on Jul 29, 2021. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample provide by manufacturer and the test data has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has been pass the FCC requirement.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory, the test report shall not be reproduced except in full.



Approved by: Cona Huang / Deputy Manager



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History of this test report

Report No.	Version	Description	Issued Date
FA982310-05	01	Initial issue of report	Aug. 27, 2021



1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for Freeus, LLC, mPERS, Belle X ATT, are as follows.

Table with columns: Equipment Class, Frequency Band, Highest SAR Summary (Head, Body-worn, Extremity), Highest Simultaneous Transmission (1g SAR, 10g SAR). Rows include LTE Band 2, 4, 12 and a Date of Testing row.

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190) and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test. This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg for Partial-Body 1g SAR, 4.0 W/kg for Extremity 10g SAR) 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.

Reviewed by: Jason Wang
Report Producer: Carlie Tsai

2. Guidance Applied

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards, the below KDB standard may not including in the TAF code without accreditation.

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



3. Equipment Under Test (EUT) Information

3.1 General Information

Product Feature & Specification	
Equipment Name	mPERS
Brand Name	Belle
Model Name	Belle X ATT
Marketing Name	Belle X
FCC ID	2AP4W-ALITE
Wireless Technology and Frequency Range	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 12: 699 MHz ~ 716 MHz WLAN 2.4 GHz Band: 2400 MHz ~ 2483.5 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz
Mode	LTE: QPSK, 16QAM WLAN: 802.11b/g/n HT20 Bluetooth BR/EDR/LE
HW Version	MP3
SW Version	SW V6.00.210708R
EUT Stage	Identical Prototype
Remark:	
1. Variant report to add Bluetooth RF exposure evaluation and spot check WWAN operation, and spot check WWAN SAR were not higher than original report, so the WWAN SAR results from original Sporton SAR Report No.: FA982310 are using for simultaneous transmission.	



3.2 General LTE SAR Test and Reporting Considerations

Summarized necessary items addressed in KDB 941225 D05 v02r05												
FCC ID	2AP4W-ALITE											
Equipment Name	mPERS											
Operating Frequency Range of each LTE transmission band	LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 12: 699 MHz ~ 716 MHz											
Channel Bandwidth	LTE Band 2: 1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 4: 1.4MHz, 3MHz, 5MHz, 10MHz, 15MHz, 20MHz LTE Band 12: 1.4MHz, 3MHz, 5MHz, 10MHz											
uplink modulations used	QPSK / 16QAM											
LTE Voice / Data requirements	Data only											
LTE MPR permanently built-in by design	Table 6.2.3-1: Maximum Power Reduction (MPR) for Power Class 1, 2 and 3											
	Modulation	Channel bandwidth / Transmission bandwidth (N _{RB})						MPR (dB)				
		1.4 MHz	3.0 MHz	5 MHz	10 MHz	15 MHz	20 MHz					
	QPSK	> 5	> 4	> 8	> 12	> 16	> 18	≤ 1				
	16 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 1				
	16 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 2				
	64 QAM	≤ 5	≤ 4	≤ 8	≤ 12	≤ 16	≤ 18	≤ 2				
64 QAM	> 5	> 4	> 8	> 12	> 16	> 18	≤ 3					
256 QAM	≥ 1						≤ 5					
LTE A-MPR	In the base station simulator configuration, Network Setting value is set to NS_01 to disable A-MPR during SAR testing and the LTE SAR tests was transmitting on all TTI frames (Maximum TTI)											
Spectrum plots for RB configuration	A properly configured base station simulator was used for the SAR and power measurement; therefore, spectrum plots for each RB allocation and offset configuration are not included in the SAR report.											
Transmission (H, M, L) channel numbers and frequencies in each LTE band												
LTE Band 2												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	18607	1850.7	18615	1851.5	18625	1852.5	18650	1855	18675	1857.5	18700	1860
M	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880	18900	1880
H	19193	1909.3	19185	1908.5	19175	1907.5	19150	1905	19125	1902.5	19100	1900
LTE Band 4												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz		Bandwidth 15 MHz		Bandwidth 20 MHz	
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	19957	1710.7	19965	1711.5	19975	1712.5	20000	1715	20025	1717.5	20050	1720
M	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5	20175	1732.5
H	20393	1754.3	20385	1753.5	20375	1752.5	20350	1750	20325	1747.5	20300	1745
LTE Band 12												
	Bandwidth 1.4 MHz		Bandwidth 3 MHz		Bandwidth 5 MHz		Bandwidth 10 MHz					
	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)	Ch. #	Freq. (MHz)
L	23017	699.7	23025	700.5	23035	701.5	23060	704				
M	23095	707.5	23095	707.5	23095	707.5	23095	707.5				
H	23173	715.3	23165	714.5	23155	713.5	23130	711				



4. RF Exposure Limits

4.1 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.

4.2 Controlled Environment

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

Limits for Occupational/Controlled Exposure (W/kg)

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

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

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

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

5. Specific Absorption Rate (SAR)

5.1 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.

5.2 SAR Definition

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

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

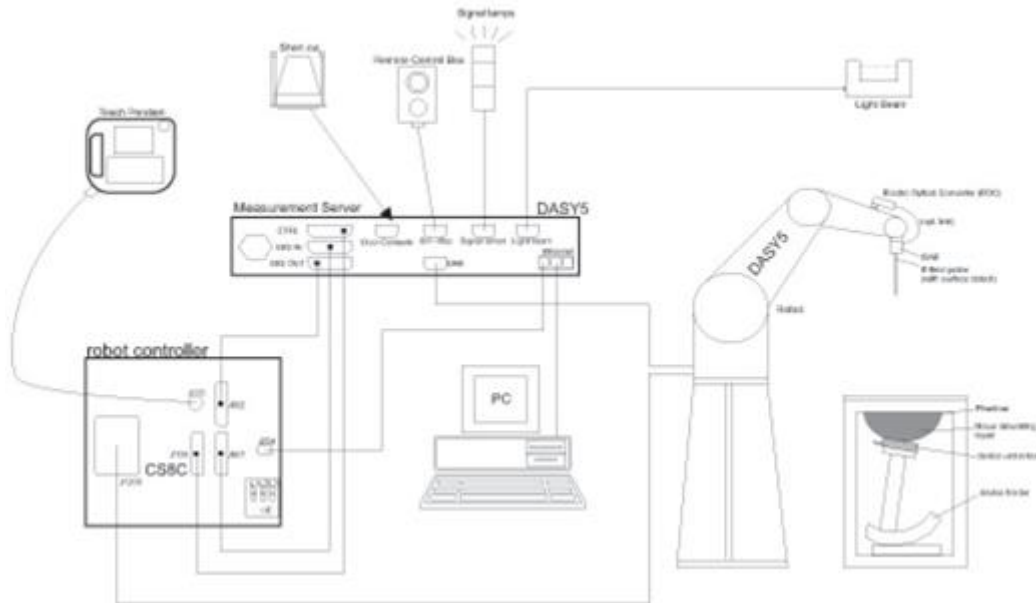
SAR is expressed in units of Watts per kilogram (W/kg)

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

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

6. 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.

6.1 Test Site Location


The SAR measurement facilities used to collect data are within both Sporton Lab list below test site location are accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190 and 3786) and the FCC designation No. TW1190 and TW3786 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.

Test Site	EMC & Wireless Communications Laboratory		Wensan Laboratory		
Test Site Location	TW1190 No.52, Huaya 1st Rd., Guishan Dist., Taoyuan City 333, Taiwan		TW3786 No.58, Aly. 75, Ln. 564, Wenhua 3rd, Rd., Guishan Dist., Taoyuan City 333010, Taiwan		
Test Site No.	SAR01-HY	SAR03-HY	SAR08-HY	SAR09-HY	SAR15-HY
	SAR04-HY	SAR05-HY	SAR11-HY	SAR12-HY	
	SAR06-HY	SAR10-HY	SAR13-HY	SAR14-HY	


6.2 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>

Construction	Symmetric design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz – 4 GHz; Linearity: ± 0.2 dB (30 MHz – 4 GHz)	
Directivity	± 0.2 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	5 μ W/g – >100 mW/g; Linearity: ± 0.2 dB	
Dimensions	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	

<EX3DV4 Probe>

Construction	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	10 MHz – >6 GHz Linearity: ± 0.2 dB (30 MHz – 6 GHz)	
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μ W/g – >100 mW/g Linearity: ± 0.2 dB (noise: typically <1 μ W/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	

6.3 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 5.1 Photo of DAE

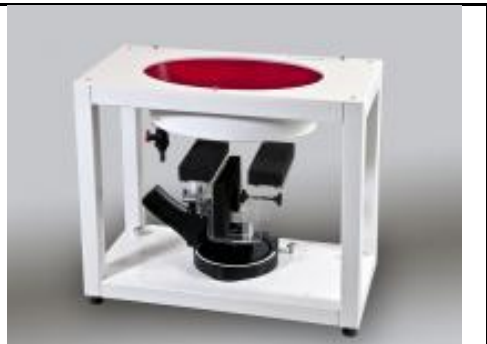
6.4 Phantom

<SAM Twin Phantom>

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

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%)	
Filling Volume	Approx. 30 liters	
Dimensions	Major ellipse axis: 600 mm Minor axis: 400 mm	

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with standard and all known tissue simulating liquids.

6.5 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

7. Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D 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

7.1 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



7.2 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.

7.3 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: Δx_{Area} , Δy_{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.	

7.4 Zoom Scan

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

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

		≤ 3 GHz	> 3 GHz	
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details. * When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

7.5 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.

7.6 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.



8. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	750MHz System Validation Kit ⁽²⁾	D750V3	1107	Mar. 08, 2019	Mar. 05, 2022
SPEAG	1750MHz System Validation Kit ⁽²⁾	D1750V2	1112	Mar. 07, 2019	Mar. 04, 2022
SPEAG	1900MHz System Validation Kit ⁽²⁾	D1900V2	5d041	Sep. 11, 2018	Sep. 08, 2021
SPEAG	Data Acquisition Electronics	DAE4	699	Feb. 16, 2021	Feb. 15, 2022
SPEAG	Dosimetric E-Field Probe	EX3DV4	3976	Jan. 27, 2021	Jan. 26, 2022
Testo	Hygro meter	608-H1	45196600	Nov. 10, 2020	Nov. 09, 2021
Anritsu	Radio Communication Analyzer	MT8821C	6201341950	Nov. 10, 2020	Nov. 09, 2021
Keysight	Wireless Communication Test Set	E5515C	MY50266977	May. 12, 2021	May. 11, 2022
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Anritsu	Signal Generator	MG3710A	6201502524	Nov. 11, 2020	Nov. 10, 2021
Keysight	ENA Network Analyzer	E5071C	MY46104758	Sep. 03, 2020	Sep. 02, 2021
SPEAG	Dielectric Probe Kit	DAK-3.5	1126	Sep. 16, 2020	Sep. 15, 2021
LINE SEIKI	Digital Thermometer	DTM3000-spezial	2942	Nov. 06, 2020	Nov. 05, 2021
Anritsu	Power Meter	ML2495A	1419002	Aug. 19, 2020	Aug. 18, 2021
Anritsu	Power Sensor	MA2411B	1911176	Aug. 18, 2020	Aug. 17, 2021
Anritsu	Power Meter	ML2495A	1804003	Oct. 21, 2020	Oct. 20, 2021
Anritsu	Power Sensor	MA2411B	1726150	Oct. 21, 2020	Oct. 20, 2021
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jul. 16, 2021	Jul. 15, 2022
Anritsu	Spectrum Analyzer	N9010A	MY53470118	Jan. 15, 2021	Jan. 14, 2022
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 21, 2020	Oct. 20, 2021
Mini-Circuits	Power Amplifier	ZVE-8G+	479102029	Aug. 26, 2020	Aug. 25, 2021
ATM	Dual Directional Coupler	C122H-10	P610410z-02	Note 1	
Warison	Directional Coupler	WCOU-10-50S-10	WR889BMC4B1	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005- 3	N/A	Note 1	

General 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. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

9. System Verification

9.1 Tissue Verification

The tissue dielectric parameters of tissue-equivalent media used for SAR measurements must be characterized within a temperature range of 18°C to 25°C, measured with calibrated instruments and apparatuses, such as network analyzers and temperature probes. The temperature of the tissue-equivalent medium during SAR measurement must also be within 18°C to 25°C and within ± 2°C of the temperature when the tissue parameters are characterized. The tissue dielectric measurement system must be calibrated before use. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements.

The liquid tissue depth was at least 15cm in the phantom for all SAR testing

<Tissue Dielectric Parameter Check Results>

Frequency (MHz)	Liquid Temp. (°C)	Conductivity (σ)	Permittivity (ε _r)	Conductivity Target (σ)	Permittivity Target (ε _r)	Delta (σ) (%)	Delta (ε _r) (%)	Limit (%)	Date
750	22.5	0.883	43.146	0.89	41.90	-0.79	2.97	±5	2021/7/29
1750	22.5	1.376	40.984	1.37	40.10	0.44	2.20	±5	2021/7/29
1900	22.5	1.392	40.731	1.40	40.00	-0.57	1.83	±5	2021/7/29

9.2 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.

Test Site	Date	Frequency (MHz)	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 (%)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
SAR08	2021/7/29	750	50	D750V3-1107	EX3DV4 - SN3976	DAE4 Sn699	0.388	8.320	7.760	-6.73	0.256	5.610	5.120	-8.73
SAR08	2021/7/29	1750	50	D1750V2-1112	EX3DV4 - SN3976	DAE4 Sn699	1.840	36.700	36.800	0.27	0.991	19.400	19.820	2.16
SAR08	2021/7/29	1900	50	D1900V2-5d041	EX3DV4 - SN3976	DAE4 Sn699	1.960	40.200	39.200	-2.49	1.040	21.200	20.800	-1.89

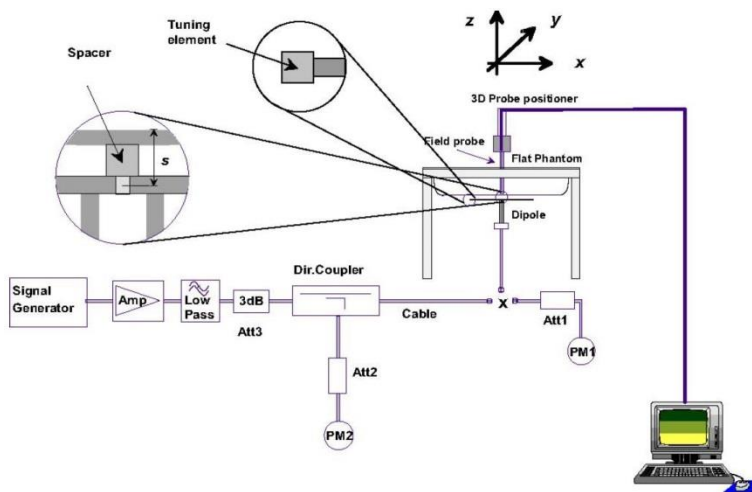


Fig 8.3.1 System Performance Check Setup



Fig 8.3.2 Setup Photo



10. LTE Output Power (Unit: dBm)

<LTE Conducted Power>

General Note:

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

<LTE Band 2>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Middle Ch. / Freq.	Power High Ch. / Freq.	Tune-up limit (dBm)	MPR (dB)
Channel				18700	18900	19100		
Frequency (MHz)				1860	1880	1900		
20	QPSK	1	0	22.96	22.99	22.96	23	0

<LTE Band 4>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Middle Ch. / Freq.	Power High Ch. / Freq.	Tune-up limit (dBm)	MPR (dB)
Channel				20050	20175	20300		
Frequency (MHz)				1720	1732.5	1745		
20	QPSK	1	0	22.91	22.98	22.95	23	0

<LTE Band 12>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Middle Ch. / Freq.	Power High Ch. / Freq.	Tune-up limit (dBm)	MPR (dB)
Channel				23060	23095	23130		
Frequency (MHz)				704	707.5	711		
10	QPSK	1	0	23.77	23.98	23.91	24	0



11. Test Exclusions Applied

<WLAN>

Mode	Maximum Average power (dBm)
802.11b	2.0
802.11g	2.0
802.11n	1.0

Note:

- Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at *test separation distances* ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$
 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR
 - f(GHz) is the RF channel transmit frequency in GHz
 - Power and distance are rounded to the nearest mW and mm before calculation
 - The result is rounded to one decimal place for comparison

Exposure Position	Max Power (dBm)	Separation Distance (mm)	Frequency (GHz)	exclusion thresholds	exclusion Limit	SAR testing
Head	3	< 10	2.48	0.31	3	No
Body-worn	3	< 5	2.48	0.63	3	No
Extremity	3	< 5	2.48	0.63	7.5	No

<Bluetooth>

Mode	Channel	Frequency (MHz)	Average power (dBm)
			GFSK
LE	CH 00	2402	1.60
	CH 19	2440	2.20
	CH 39	2480	2.40
Tune-up Limit			3

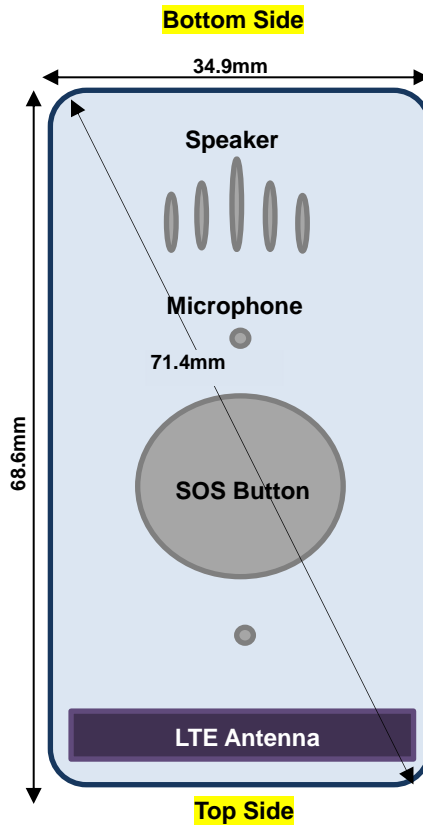
Note:

- Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at *test separation distances* ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$
 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR
 - f(GHz) is the RF channel transmit frequency in GHz
 - Power and distance are rounded to the nearest mW and mm before calculation
 - The result is rounded to one decimal place for comparison

Exposure Position	Max Power (dBm)	Separation Distance (mm)	Frequency (GHz)	exclusion thresholds	exclusion Limit	SAR testing
Head	3	< 10	2.48	0.31	3	No
Body-worn	3	< 5	2.48	0.63	3	No
Extremity	3	< 5	2.48	0.63	7.5	No

12. Antenna Location



Front View



13. SAR Test Results

General Note:

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b. For WWAN Head and Extremity condition: Reported SAR(W/kg)= Measured SAR(W/kg) * Tune-up Scaling Factor
 - c. For WWAN Body-worn condition: Reported SAR(W/kg)= Measured SAR(W/kg) * Tune-up Scaling Factor * Transmission Scaling Factor
2. According to the SAR analysis exhibit, LTE B2/B4/B12 maximum tune-up power scaled down with the transmission factor is applied in body-worn reported SAR calculation.

13.1 Head SAR

<FDD LTE SAR>

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
01	LTE Band 2	20M	QPSK	1	0	Front	10mm	18700	1860	22.96	23.00	1.009	0.07	0.669	0.675
02	LTE Band 4	20M	QPSK	1	0	Front	10mm	20175	1732.5	22.98	23.00	1.005	-0.1	1.030	1.035
03	LTE Band 12	10M	QPSK	1	0	Front	10mm	23095	707.5	23.98	24.00	1.005	0.03	0.347	0.349

13.2 Body Worn Accessory SAR

<FDD LTE SAR>

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Transmission Cycle %	Transmission Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
04	LTE Band 2	20M	QPSK	1	0	Back	0mm	19100	1900	22.96	23.00	1.009	8.1	0.081	-0.03	4.360	0.356
05	LTE Band 4	20M	QPSK	1	0	Back	0mm	20175	1732.5	22.98	23.00	1.005	8.1	0.081	0.07	4.070	0.331
06	LTE Band 12	10M	QPSK	1	0	Back	0mm	23095	707.5	23.98	24.00	1.005	8.1	0.080	-0.06	0.669	0.054

13.3 Extremity SAR

<FDD LTE SAR>

Plot No.	Band	BW (MHz)	Modulation	RB Size	RB offset	Test Position	Gap (mm)	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 10g SAR (W/kg)	Reported 10g SAR (W/kg)
07	LTE Band 2	20M	QPSK	1	0	Back	0mm	18700	1860	22.96	23.00	1.009	-0.03	1.980	1.998
08	LTE Band 4	20M	QPSK	1	0	Back	0mm	20175	1732.5	22.98	23.00	1.005	0.07	1.920	1.929
09	LTE Band 12	10M	QPSK	1	0	Back	0mm	23095	707.5	23.98	24.00	1.005	-0.06	0.376	0.378

14. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Head	Body-worn	Extremity
1.	WWAN + WLAN 2.4GHz	Yes	Yes	Yes
2.	WWAN + BT	Yes	Yes	Yes

General Note:

1. The Scaled SAR summation is calculated based on the same configuration and test position.
2. Per KDB 447498 D01v06, simultaneous transmission SAR is compliant if,
 - i) Scalar SAR summation < 1.6W/kg.
 - ii) $SPLSR = (SAR1 + SAR2)^{1.5} / (\text{min. separation distance, mm})$, and the peak separation distance is determined from the square root of $[(x1-x2)^2 + (y1-y2)^2 + (z1-z2)^2]$, where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.
 - iii) If $SPLSR \leq 0.04$, simultaneously transmission SAR measurement is not necessary.
 - iv) Simultaneously transmission SAR measurement, and the reported multi-band SAR < 1.6W/kg.
3. For simultaneous transmission analysis, WLAN/Bluetooth SAR is estimated per KDB 447498 D01v06 based on the formula below.
 - i) $(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \cdot [\sqrt{f(\text{GHz})} / x] \text{ W/kg}$ for test separation distances $\leq 50 \text{ mm}$; where $x = 7.5$ for 1-g SAR, and $x = 18.75$ for 10-g SAR.
 - ii) When the minimum separation distance is < 5mm, the distance is used 5mm to determine SAR test exclusion.
 - iii) 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

WLAN Max Power	Exposure Position	Head	Body worn	Extremity
	Test separation	10 mm	0 mm	0 mm
3 dBm	Estimated SAR (W/kg)	0.042 W/kg	0.084 W/kg	0.034 W/kg

Bluetooth Max Power	Exposure Position	Head	Body worn	Extremity
	Test separation	10 mm	0 mm	0 mm
3 dBm	Estimated SAR (W/kg)	0.042 W/kg	0.084 W/kg	0.034 W/kg



14.1 Head Exposure Conditions

WWAN Band		Exposure Position	1	2	3	1+2 Summed 1g SAR (W/kg)	1+3 Summed 1g SAR (W/kg)
			WWAN 1g SAR (W/kg)	2.4GHz WLAN Estimated 1g SAR (W/kg)	Bluetooth Estimated 1g SAR (W/kg)		
LTE	LTE Band 2	Front	1.091	0.042	0.042	1.133	1.133
		Bottom Side	0.121	0.042	0.042	0.163	0.163
	LTE Band 4	Front	1.320	0.042	0.042	1.362	1.362
		Bottom Side	0.077	0.042	0.042	0.119	0.119
	LTE Band 12	Front	0.434	0.042	0.042	0.476	0.476
		Bottom Side	0.057	0.042	0.042	0.099	0.099

14.2 Body-Worn Accessory Exposure Conditions

WWAN Band		Exposure Position	1	2	3	1+2 Summed 1g SAR (W/kg)	1+3 Summed 1g SAR (W/kg)
			WWAN 1g SAR (W/kg)	2.4GHz WLAN Estimated 1g SAR (W/kg)	Bluetooth Estimated 1g SAR (W/kg)		
LTE	LTE Band 2	Front	0.483	0.084	0.084	0.567	0.567
		Back	0.273	0.084	0.084	0.357	0.357
		Left side	0.319	0.084	0.084	0.403	0.403
		Right side	0.054	0.084	0.084	0.138	0.138
		Top side	0.403	0.084	0.084	0.487	0.487
		Bottom side	0.025	0.084	0.084	0.109	0.109
	LTE Band 4	Front	0.402	0.084	0.084	0.486	0.486
		Back	0.257	0.084	0.084	0.341	0.341
		Left side	0.338	0.084	0.084	0.422	0.422
		Right side	0.047	0.084	0.084	0.131	0.131
		Top side	0.204	0.084	0.084	0.288	0.288
		Bottom side	0.013	0.084	0.084	0.097	0.097
	LTE Band 12	Front	0.078	0.084	0.084	0.162	0.162
		Back	0.079	0.084	0.084	0.163	0.163
		Left side	0.078	0.084	0.084	0.162	0.162
		Right side	0.074	0.084	0.084	0.158	0.158
		Top side	0.042	0.084	0.084	0.126	0.126
		Bottom side	0.028	0.084	0.084	0.112	0.112



14.3 Extremity Exposure Conditions

WWAN Band		Exposure Position	1	2	3	1+2 Summed 10g SAR (W/kg)	1+3 Summed 10g SAR (W/kg)
			WWAN 10g SAR (W/kg)	2.4GHz WLAN Estimated 10g SAR (W/kg)	Bluetooth Estimated 10g SAR (W/kg)		
LTE	LTE Band 2	Front	2.600	0.034	0.034	2.634	2.634
		Back	1.812	0.034	0.034	1.846	1.846
		Left side	1.749	0.034	0.034	1.783	1.783
		Right side	0.326	0.034	0.034	0.360	0.360
		Top side	1.937	0.034	0.034	1.971	1.971
		Bottom side	0.166	0.034	0.034	0.200	0.200
	LTE Band 4	Front	2.330	0.034	0.034	2.364	2.364
		Back	1.930	0.034	0.034	1.964	1.964
		Left side	1.850	0.034	0.034	1.884	1.884
		Right side	0.296	0.034	0.034	0.330	0.330
		Top side	0.950	0.034	0.034	0.984	0.984
		Bottom side	0.082	0.034	0.034	0.116	0.116
	LTE Band 12	Front	0.539	0.034	0.034	0.573	0.573
		Back	0.634	0.034	0.034	0.668	0.668
		Left side	0.463	0.034	0.034	0.497	0.497
		Right side	0.273	0.034	0.034	0.307	0.307
		Top side	0.178	0.034	0.034	0.212	0.212
		Bottom side	0.129	0.034	0.034	0.163	0.163

Test Engineer : Willie Huang and Ken Lin



15. Uncertainty Assessment

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

Declaration of Conformity:

The test results with all measurement uncertainty excluded is 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.

16. 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 248227 D01 v02r02, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Oct 2015.
- [6] FCC KDB 447498 D01 v06, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Oct 2015
- [7] FCC KDB 941225 D05 v02r05, "SAR Evaluation Considerations for LTE Devices", Dec 2015
- [8] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [9] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.