

# **ELEMENT MATERIALS TECHNOLOGY**

Morgan Hill

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## SAR EVALUATION REPORT

**Applicant Name:** Apple Inc. One Apple Park Way Cupertino, CA 95014 USA Date of Testing: 12/14/2022 **Test Site/Location:** Element, Morgan Hill, CA, USA **Document Serial No.:** 1C2211040069-03.BCG

FCC ID: **BCGA2871** 

APPLICANT: APPLE, INC.

**DUT Type:** Wireless Earbud **Application Type:** Certification FCC Rule Part(s): CFR §2.1093 Model: A2871

| Equipment |             |                 | SAR               |                         |
|-----------|-------------|-----------------|-------------------|-------------------------|
| Class     | Band & Mode | Tx Frequency    | 1g Head<br>(W/kg) | 1g Body-<br>Worn (W/kg) |
| DSS/DTS   | Bluetooth   | 2402 - 2480 MHz | 0.92              | 0.46                    |

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE C95.1-1992 and has been tested in accordance with the measurement procedures specified in Section 1.6 of this report; for North American frequency bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.

RJ Ortanez

Executive Vice President







The SAR Tick is an initiative of the Mobile & Wireless Forum (MWF). While a product may be considered eligible, use of the SAR Tick logo requires an agreement with the MWF. Further details can be obtained by emailing: sartick@mwfai.info.

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## **DEVICE UNDER TEST**

### **Device Overview** 1.1

| Band & Mode | Operating Modes | Tx Frequency    |
|-------------|-----------------|-----------------|
| Bluetooth   | Data            | 2402 - 2480 MHz |

### 1.2 **Power Reduction for SAR**

There is no power reduction used for any band/mode implemented in this device for SAR purposes.

### **Nominal and Maximum Output Power Specifications** 1.3

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

1.3.1 **Maximum Output Power** 

| Mode / Band            | Modulated Average (dBm) |       |  |
|------------------------|-------------------------|-------|--|
| 2.4 GHz Bluetooth BDR  | Maximum                 | 14.00 |  |
| 2.4 GHZ BluetOOtil BDK | Nominal                 | 13.00 |  |
| 2.4 GHz Bluetooth EDR  | Maximum                 | 9.00  |  |
| 2.4 GHZ Bluetootii EDK | Nominal                 | 8.00  |  |
| 2.4 GHz Bluetooth BLE  | Maximum                 | 9.00  |  |
| 2.4 GHZ BIUELOOTH BLE  | Nominal                 | 8.00  |  |

### 1.4 **DUT Antenna Locations**

Based on the expected use conditions, Head SAR was evaluated. Per manufacturer request, Body-Worn SAR was evaluated as an additional conservative SAR test condition. The antenna is located inside BCGA2871 which is a wireless Bluetooth earbud for the right ear. A diagram showing the location of the device antenna can be found in Appendix E. More information about the configurations evaluated for SAR can be found in Section 4.2 and Section 4.3.

### 1.5 **Simultaneous Transmission Capabilities**

This Device does not support any Simultaneous transmission Scenarios.

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## 1.6 Guidance Applied

- FCC KDB Publication 447498 D01v06 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)

## 1.7 Device Serial Numbers

Several samples with identical hardware were used to support SAR testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 9.

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### 2 INTRODUCTION

The FCC and Innovation, Science, and Economic Development Canada have adopted the guidelines for evaluating the environmental effects of radio frequency (RF) radiation in ET Docket 93-62 on Aug. 6, 1996, and Health Canada Safety Code 6 to protect the public and workers from the potential hazards of RF emissions due to FCC-regulated portable devices. [1]

The safety limits used for the environmental evaluation measurements are based on the criteria published by the American National Standards Institute (ANSI) for localized specific absorption rate (SAR) in IEEE/ANSI C95.1-1992 Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz [3] and Health Canada RF Exposure Guidelines Safety Code 6 [22]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [4] is used for guidance in measuring the Specific Absorption Rate (SAR) due to the RF radiation exposure from the Equipment Under Test (EUT). These criteria for SAR evaluation are similar to those recommended by the International Committee for Non-Ionizing Radiation Protection (ICNIRP) in Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," Report No. Vol 74. SAR is a measure of the rate of energy absorption due to exposure to an RF transmitting source. SAR values have been related to threshold levels for potential biological hazards.

#### 2.1 **SAR Definition**

Specific Absorption Rate is defined as the time derivative (rate) of the incremental energy (dU) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dV) of a given density (ρ). It is also defined as the rate of RF energy absorption per unit mass at a point in an absorbing body (see Equation 2-1).

## Equation 2-1 **SAR Mathematical Equation**

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

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

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

where:

 $\sigma$  = conductivity of the tissue-simulating material (S/m)

 $\rho$  = mass density of the tissue-simulating material (kg/m<sup>3</sup>)

E = Total RMS electric field strength (V/m)

NOTE: The primary factors that control rate of energy absorption were found to be the wavelength of the incident field in relation to the dimensions and geometry of the irradiated organism, the orientation of the organism in relation to the polarity of field vectors, the presence of reflecting surfaces, and whether conductive contact is made by the organism with a ground plane.[6]

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#### 3.1 **Measurement Procedure**

The evaluation was performed using the following procedure compliant to FCC KDB Publication 865664 D01v01r04 and IEEE 1528-2013:

- 1. The SAR distribution at the exposed side of the head or body was measured at a distance no greater than 5.0 mm from the inner surface of the shell. The area covered the entire dimension of the device-head and body interface. and the horizontal grid resolution was determined per FCC KDB Publication 865664 D01v01r04 (See Table 3-1) and IEEE 1528-2013.
- 2. The point SAR measurement was taken at the maximum SAR region determined from Step 1 to enable the monitoring of SAR fluctuations/drifts during the 1g/10g cube evaluation. SAR at this fixed point was measured and used as a reference value.

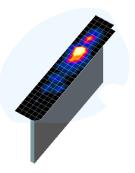


Figure 3-1 Sample SAR Area Scan

- 3. Based on the area scan data, the peak of the region with maximum SAR was determined by spline interpolation. Around this point, a volume was assessed according to the measurement resolution and volume size requirements of FCC KDB Publication 865664 D01v01r04 (See Table 3-1) and IEEE 1528-2013. On the basis of this data set, the spatial peak SAR value was evaluated with the following procedure (see references or the cDASY6 manual online for more details):
  - a. SAR values at the inner surface of the phantom are extrapolated from the measured values along the line away from the surface with spacing no greater than that in Table 3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (normal to the phantom shell).
  - b. After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm. One thousand points (10 x 10 x 10) were obtained through interpolation, in order to calculate the averaged SAR.
  - c. All neighboring volumes were evaluated until no neighboring volume with a higher average value was
- 4. The SAR reference value, at the same location as step 2, was re-measured after the zoom scan was complete to calculate the SAR drift. If the drift deviated by more than 5%, the SAR test and drift measurements were repeated.

Table 3-1 Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v01r04\*

|           | Maximum Area Scan  | Maximum Zoom Scan  | Maximum Zoom Scan Spatial<br>Resolution (mm) |                         | Minimum Zoom Scan               |                        |
|-----------|--|--|--|-------------------------|---------------------------------|------------------------|
| Frequency | Resolution (mm) (Δx <sub>area</sub> , Δy <sub>area</sub> ) | Resolution (mm) (Δx <sub>200m</sub> , Δy <sub>200m</sub> ) | Uniform Grid                                 | Graded Grid             |                                 | Volume (mm)<br>(x,y,z) |
|           | Turcus Furcus  | 1 20011 7 200117   | Δz <sub>zoom</sub> (n)                       | Δz <sub>zoom</sub> (1)* | Δz <sub>zoom</sub> (n>1)*       | , .,, ,                |
| ≤2 GHz    | ≤15  | ≤8   | ≤5   | ≤4                      | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 30                   |
| 2-3 GHz   | ≤12  | ≤5   | ≤5   | ≤4                      | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 30                   |
| 3-4 GHz   | ≤12  | ≤5   | ≤4   | ≤3                      | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 28                   |
| 4-5 GHz   | ≤ 10   | ≤ 4  | ≤3   | ≤2.5                    | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 25                   |
| 5-6 GHz   | ≤ 10   | ≤ 4  | ≤ 2  | ≤2                      | $\leq 1.5*\Delta z_{zoom}(n-1)$ | ≥ 22                   |

<sup>\*</sup>Also compliant to IEEE 1528-2013 Table 6

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### 4 TEST CONFIGURATION POSITIONS

### 4.1 **Device Holder**

The device holder is made out of low-loss POM material having the following dielectric parameters: relative permittivity  $\varepsilon = 3$  and loss tangent  $\delta = 0.02$ .

### 4.2 **Positioning for Head**

This device is a wireless Bluetooth earbud for the right ear which is designed to be used in the ear canal. The antenna is located inside the earbud. SAR was evaluated with a separation distance of 0 mm between the earbud (the ear tip facing the phantom) and the flat phantom. The phantom is filled with head tissue equivalent medium.

### **Body-Worn Exposure Conditions** 4.3

Per manufacturer request, Body-Worn SAR was evaluated as an additional conservative SAR test condition for the right earbud. The DUT was evaluated with a separation distance of 0 mm between the back side of the earbud and the flat phantom. The phantom is filled with head tissue equivalent medium.

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### 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. 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.

Table 5-1 SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

| HUMAN EXPOSURE LIMITS  |   |   |  |  |  |  |  |  |  |
|--|---|---|--|--|--|--|--|--|--|
|  | UNCONTROLLED<br>ENVIRONMENT<br>General Population<br>(W/kg) or (mW/g) | CONTROLLED<br>ENVIRONMENT<br>Occupational<br>(W/kg) or (mW/g) |  |  |  |  |  |  |  |
| Peak Spatial Average SAR<br>Head                             | 1.6   | 8.0   |  |  |  |  |  |  |  |
| Whole Body SAR   | 0.08  | 0.4   |  |  |  |  |  |  |  |
| Peak Spatial Average SAR<br>Hands, Feet, Ankle, Wrists, etc. | 4.0   | 20  |  |  |  |  |  |  |  |

<sup>1.</sup> The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

The Spatial Average value of the SAR averaged over the whole body.

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The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

## 6 FCC MEASUREMENT PROCEDURES

## 6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

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## 7 RF CONDUCTED POWERS

## 7.1 Bluetooth Conducted Powers

Table 7-1
Bluetooth Average RF Power

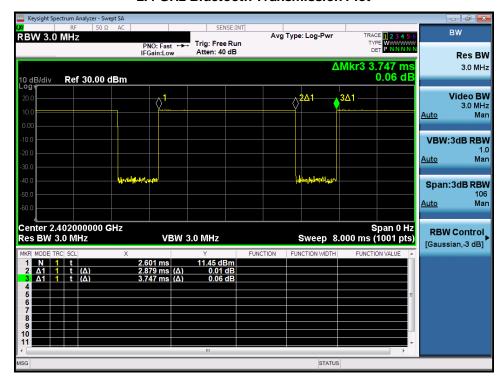
| _                  |            | Data           |                | Avg Conducted<br>Power |        |  |  |
|--------------------|------------|----------------|----------------|------------------------|--------|--|--|
| Frequency<br>[MHz] | Modulation | Rate<br>[Mbps] | Channel<br>No. | [dBm]                  | [mW]   |  |  |
| 2402               | GFSK       | GFSK 1.0 0     |                | 12.81                  | 19.099 |  |  |
| 2441               | GFSK       | 1.0            | 39             | 12.49                  | 17.742 |  |  |
| 2480               | GFSK       | 1.0            | 78             | 12.59                  | 18.155 |  |  |

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## 7.2 Bluetooth Duty Cycle

## 7.2.1 Maximum Bluetooth Transmission

Figure 7-1
2.4 GHz Bluetooth Transmission Plot



Equation 7-1
2.4 GHz Bluetooth Duty Cycle Calculation

$$Duty\ Cycle = \frac{Pulse\ Width}{Period}*100\% = \frac{2.879\ ms}{3.747\ ms}*100\% = 76.8\%$$

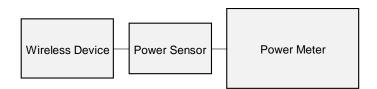


Figure 7-2 Power Measurement Setup

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### 8.1 Tissue Verification

Table 8-1
Measured Head Tissue Properties

| incasured riedu rissue i roperties       |             |   |                                |                                      |                                       |                                    |                                     |         |         |  |  |  |  |
|--|-------------|---|--------------------------------|--------------------------------------|---------------------------------------|------------------------------------|-------------------------------------|---------|---------|--|--|--|--|
| Calibrated for<br>Tests Performed<br>on: | Tissue Type | Tissue Temp<br>During Calibration<br>(°C) | Measured<br>Frequency<br>(MHz) | Measured<br>Conductivity,<br>σ (S/m) | Measured<br>Dielectric<br>Constant, ε | TARGET<br>Conductivity,<br>σ (S/m) | TARGET<br>Dielectric<br>Constant, ε | % dev σ | % dev ε |  |  |  |  |
|  |             |   | 2300                           | 1.651                                | 38.814                                | 1.670                              | 39.500                              | -1.14%  | -1.74%  |  |  |  |  |
|  |             |   | 2310                           | 1.659                                | 38.799                                | 1.679                              | 39.480                              | -1.19%  | -1.72%  |  |  |  |  |
|  |             |   | 2320                           | 1.667                                | 38.783                                | 1.687                              | 39.460                              | -1.19%  | -1.72%  |  |  |  |  |
|  |             |   | 2400                           | 1.724                                | 38.658                                | 1.756                              | 39.289                              | -1.82%  | -1.61%  |  |  |  |  |
|  |             |   | 2450                           | 1.762                                | 38.576                                | 1.800                              | 39.200                              | -2.11%  | -1.59%  |  |  |  |  |
|  |             |   | 2480                           | 1.784                                | 38.536                                | 1.833                              | 39.162                              | -2.67%  | -1.60%  |  |  |  |  |
| 12/14/2022                               | 2450 Head   | 20.0                                      | 2500                           | 1.798                                | 38.514                                | 1.855                              | 39.136                              | -3.07%  | -1.59%  |  |  |  |  |
|  |             |   | 2510                           | 1.806                                | 38.499                                | 1.866                              | 39.123                              | -3.22%  | -1.59%  |  |  |  |  |
|  |             |   | 2535                           | 1.827                                | 38.453                                | 1.893                              | 39.092                              | -3.49%  | -1.63%  |  |  |  |  |
|  |             |   | 2550                           | 1.839                                | 38.424                                | 1.909                              | 39.073                              | -3.67%  | -1.66%  |  |  |  |  |
|  |             |   | 2560                           | 1.847                                | 38.404                                | 1.920                              | 39.060                              | -3.80%  | -1.68%  |  |  |  |  |
|  |             |   | 2600 1.878                     |                                      | 38.350                                | 1.964                              | 39.009                              | -4.38%  | -1.69%  |  |  |  |  |
|  |             |   | 2650                           | 1.921                                | 38.254                                | 2.018                              | 38.945                              | -4.81%  | -1.77%  |  |  |  |  |

The above measured tissue parameters were used in the cDASY6 software. The cDASY6 software was used to perform interpolation to determine the dielectric parameters at the SAR test device frequencies (per KDB Publication 865664 D01v01r04 and IEEE 1528-2013 6.6.1.2). The tissue parameters listed in the SAR test plots may slightly differ from the table above due to significant digit rounding in the software.

Per April 2019 TCB Workshop Notes, single head-tissue simulating liquid specified in IEC 62209-1 is permitted to use for all SAR tests.

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## 8.2 Test System Verification

Prior to SAR assessment, the system is verified to  $\pm 10\%$  of the SAR measurement on the reference dipole at the time of calibration by the calibration facility. Full system validation status and result summary can be found in Appendix D.

Table 8-2
System Verification Results – 1q

|               | System Verification TARGET & MEASURED |      |            |                      |                        |                       |              |          |                          |                           |                                |                    |  |
|---------------|---------------------------------------|------|------------|----------------------|------------------------|-----------------------|--------------|----------|--------------------------|---------------------------|--------------------------------|--------------------|--|
| SAR<br>System | Frequency Date                        |      |            | Amb.<br>Temp.<br>(C) | Liquid<br>Temp.<br>(C) | Input<br>Power<br>(W) | Source<br>SN | Probe SN | Measured SAR1g<br>(W/kg) | 1W Target SAR1g<br>(W/kg) | 1W Normalized<br>SAR 1g (W/kg) | Deviation1g<br>(%) |  |
| AM1           | 2450                                  | HEAD | 12/14/2022 | 21.5                 | 20.6                   | 0.10                  | 750          | 7420     | 5.300                    | 52.60                     | 53.000                         | 0.76%              |  |

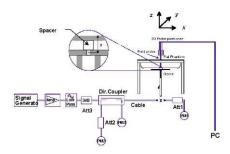


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

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## 9 SAR DATA SUMMARY

### 9.1 Standalone Head SAR Data

# Table 9-1 Bluetooth Head SAR

|       | MEASUREMENT RESULTS |                |          |                    |             |             |                 |                      |              |        |               |          |                         |                         |                      |       |
|-------|---------------------|----------------|----------|--------------------|-------------|-------------|-----------------|----------------------|--------------|--------|---------------|----------|-------------------------|-------------------------|----------------------|-------|
| FREQU | REQUENCY            | Mode           | Service  | Maximum<br>Allowed |             | Power Drift | Spacing         | Device Serial Number | Data<br>Rate | Earbud | Duty<br>Cycle | SAR (1g) | Scaling<br>Factor (Cond | Scaling<br>Factor (Duty | Reported SAR<br>(1g) | Plot# |
| MHz   | Ch.                 | <b>–</b>       |          | Power [dBm]        | Power [dBm] | [dB]        |                 |                      | (Mbps)       |        | (%)           | (W/kg)   | Power)                  | Cycle)                  | (W/kg)               |       |
| 2402  | 0                   | Bluetooth      | FHSS     | 14.00              | 12.81       | 0.00        | 0 mm            | FL6JN0P424FH         | 1            | Right  | 76.8          | 0.576    | 1.315                   | 1.009                   | 0.764                |       |
| 2441  | 39                  | Bluetooth      | FHSS     | 14.00              | 12.49       | 0.00        | 0 mm            | FL6JN0P424FH         | 1            | Right  | 76.8          | 0.610    | 1.416                   | 1.009                   | 0.872                |       |
| 2480  | 78                  | Bluetooth      | FHSS     | 14.00              | 12.59       | 0.00        | 0 mm            | FL6JN0P424FH         | 1            | Right  | 76.8          | 0.662    | 1.384                   | 1.009                   | 0.924                | A1    |
|       |                     | ANSI / IEEE C  | 5.1 1992 | - SAFETY LI        | MIT         |             | Head            |                      |              |        |               |          |                         |                         |                      |       |
|       | Spatial Peak        |                |          |                    |             |             | 1.6 W/kg (mW/g) |                      |              |        |               |          |                         |                         |                      |       |
|       | Ur                  | ncontrolled Ex | posure/G | eneral Popul       | ation       |             |                 | averaged over 1 gram |              |        |               |          |                         |                         |                      |       |

Note: The reported SAR was scaled to 77.5% transmission duty factor to determine compliance since the duty factor of the device is permanently limited to 77.5% per the manufacturer.

## 9.2 Standalone Body-Worn SAR Data

Table 9-2 Bluetooth Body-Worn SAR

|       | MEASUREMENT RESULTS                   |                |          |                    |                          |                     |         |                      |                        |        |                      |          |                         |                         |                      |        |
|-------|---------------------------------------|----------------|----------|--------------------|--------------------------|---------------------|---------|----------------------|------------------------|--------|----------------------|----------|-------------------------|-------------------------|----------------------|--------|
| FREQU | FREQUENCY                             | Mode Servi     | Service  | Maximum<br>Allowed | Conducted<br>Power [dBm] | Power Drift<br>[dB] | Spacing | Device Serial Number | Data<br>Rate<br>(Mbps) | Earbud | Duty<br>Cycle<br>(%) | SAR (1g) | Scaling<br>Factor (Cond | Scaling<br>Factor (Duty | Reported SAR<br>(1g) | Plot # |
| MHz   | Ch.                                   |                |          | Power [dBm]        | Power [abm]              |                     |         |                      |                        |        |                      | (W/kg)   | Power)                  | Cycle)                  | (W/kg)               |        |
| 2402  | 0                                     | Bluetooth      | FHSS     | 14.00              | 12.81                    | 0.05                | 0 mm    | FL6JN0P424FH         | 1                      | Right  | 76.8                 | 0.280    | 1.315                   | 1.009                   | 0.372                |        |
| 2441  | 39                                    | Bluetooth      | FHSS     | 14.00              | 12.49                    | 0.05                | 0 mm    | FL6JN0P424FH         | 1                      | Right  | 76.8                 | 0.322    | 1.416                   | 1.009                   | 0.460                |        |
| 2480  | 78                                    | Bluetooth      | FHSS     | 14.00              | 12.59                    | 0.03                | 0 mm    | FL6JN0P424FH         | 1                      | Right  | 76.8                 | 0.323    | 1.384                   | 1.009                   | 0.451                | A2     |
|       | ANSI / IEEE C95.1 1992 - SAFETY LIMIT |                |          |                    |                          |                     | Body    |                      |                        |        |                      |          |                         |                         |                      |        |
|       | Spatial Peak                          |                |          |                    |                          | 1.6 W/kg (mW/g)     |         |                      |                        |        |                      |          |                         |                         |                      |        |
|       | Ur                                    | ncontrolled Ex | nosure/G | eneral Popul       | ation                    |                     |         | averaged over 1 gram |                        |        |                      |          |                         |                         |                      |        |

Note: The reported SAR was scaled to 77.5% transmission duty factor to determine compliance since the duty factor of the device is permanently limited to 77.5% per the manufacturer.

### 9.3 SAR Test Notes

### General Notes:

- 1. Batteries are fully charged at the beginning of the SAR measurements.
- 2. Liquid tissue depth was at least 15.0 cm for all frequencies.
- 3. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
- 4. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
- 5. To demonstrate compliance for Head, SAR testing was performed on a flat phantom filled with head tissue equivalent medium.
- 6. Per manufacturer request, Body-Worn SAR was additionally evaluated as a conservative SAR test condition for the right earbud (BCGA2871).
- 7. Per FCC KDB 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg. Please see section 10 for variability analysis.
- 8. The orange highlights throughout the report represents the highest scaled SAR per Equipment Class.

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### **Bluetooth Notes**

1. Bluetooth SAR was evaluated with a test mode with hopping disabled with DH5 operation. The reported SAR was scaled to the 77.5% transmission duty factor to determine compliance for a more conservative exposure analysis. See section 7.2 for the time domain plot and calculation for the duty factor of the device.

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## 10 SAR MEASUREMENT VARIABILITY

## 10.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was not assessed for each frequency band since all measured SAR values are <0.8W/kg for 1g SAR.

## 10.2 Measurement Uncertainty

The measured SAR was <1.5 W/kg for 1g and <3.75 W/kg for 10g for all frequency bands. Therefore, per KDB Publication 865664 D01v01r04, the extended measurement uncertainty analysis per IEEE 1528-2013 was not required.

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## 11 EQUIPMENT LIST

| Manufacturer       | Model         | Description                                | Cal Date   | Cal Interval | Cal Due    | Serial Number |
|--------------------|---------------|--|------------|--------------|------------|---------------|
| Agilent            | E4440A        | PSA Series Spectrum Analyzer               | 3/22/2022  | Annual       | 3/22/2023  | MY46186272    |
| Agilent            | N5182A        | MXG Vector Signal Generator                | 1/12/2022  | Annual       | 1/12/2023  | MY47420837    |
| Agilent            | N9020A        | MXA Signal Analyzer                        | 3/22/2022  | Annual       | 3/22/2023  | MY50200571    |
| Amplifier Research | 15S1G6        | Amplifier                                  | CBT        | N/A          | CBT        | 343972        |
| Anritsu            | MA24106A      | USB Power Sensor                           | 3/2/2022   | Annual       | 3/2/2023   | 1827532       |
| Anritsu            | MA24106A      | USB Power Sensor                           | 3/2/2022   | Annual       | 3/2/2023   | 1827533       |
| Anritsu            | MA2411B       | Pulse Power Sensor                         | 3/2/2022   | Annual       | 3/2/2023   | 1126066       |
| Anritsu            | ML2495A       | Power Meter                                | 3/17/2022  | Annual       | 3/17/2023  | 941001        |
| Control Company    | 4352          | Long Stem Thermometer                      | 9/10/2021  | Biennial     | 9/10/2023  | 210774685     |
| Control Company    | 4040          | Therm./ Clock/ Humidity Monitor            | 3/12/2021  | Biennial     | 3/12/2023  | 210202151     |
| HEWLETT PACKARD    | 8753E         | Network Analyzer                           | 12/30/2021 | Annual       | 12/30/2022 | US38161081    |
| Keysight           | 772D          | Dual Directional Coupler                   | CBT        | N/A          | CBT        | MY52180215    |
| MCL                | BW-N10W5+     | 10dB Attenuator                            | CBT        | N/A          | CBT        | 1611          |
| MCL                | BW-N3W5+      | 3dB Attenuator                             | CBT        | N/A          | CBT        | 1812          |
| MCL                | BW-N6W5+      | 6dB Attenuator                             | CBT        | N/A          | CBT        | N/A           |
| Mini-Circuits      | NLP-2950+     | Low Pass Filter                            | CBT        | N/A          | CBT        | N/A           |
| Mini-Circuits      | ZHDC-16-63-S+ | 50-6000MHz Bidirectional Coupler           | CBT        | N/A          | CBT        | N/A           |
| Pasternack         | PE5011-1      | Torque Wrench                              | 12/21/2021 | Biennial     | 12/21/2023 | N/A           |
| SPEAG              | D2450V2       | 2450 MHz SAR Dipole                        | 5/11/2022  | Annual       | 5/11/2023  | 750           |
| SPEAG              | DAE4          | Dasy Data Acquisition Electronics          | 10/13/2022 | Annual       | 10/13/2023 | 1333          |
| SPEAG              | EX3DV4        | SAR Probe                                  | 10/20/2022 | Annual       | 10/20/2023 | 7420          |
| SPEAG              | MAIA          | Modulation and Audio Interference Analyzer | CBT        | N/A          | CBT        | 1237          |
| SPEAG              | DAK-3.5       | Dielectric Assessment Kit                  | 11/14/2022 | Annual       | 11/14/2023 | 1121          |

Note: CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler, or filter were connected to a calibrated source (i.e., a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.

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# 12 MEASUREMENT UNCERTAINTIES

| а   | b                        | С     | d     | e=     | f    | g      | h =            | i =            | k   |
|---|--------------------------|-------|-------|--------|------|--------|----------------|----------------|-----|
|   |                          |       |       | f(d,k) |      |        | c x f/e        | c x g/e        |     |
|   | IEEE                     | Tol.  | Prob. |        | Ci   | Ci     | 1gm            | 10gms          |     |
| Uncertainty Component   | 1528<br>Sec.             | (± %) | Dist. | Div.   | 1gm  | 10 gms | u <sub>i</sub> | u <sub>i</sub> | Vi  |
|   | 360.                     | , ,,  |       |        | 3    |        | (± %)          | (± %)          |     |
| Measurement System  |                          |       |       |        |      |        |                |                |     |
| Probe Calibration   | E.2.1                    | 7     | Ν     | 1      | 1    | 1      | 7.0            | 7.0            | ∞   |
| Axial Isotropy  | E.2.2                    | 0.25  | Ν     | 1      | 0.7  | 0.7    | 0.2            | 0.2            | ∞   |
| Hemishperical Isotropy  | E.2.2                    | 1.3   | Ν     | 1      | 0.7  | 0.7    | 0.9            | 0.9            | ∞   |
| Boundary Effect   | E.2.3                    | 2     | R     | 1.732  | 1    | 1      | 1.2            | 1.2            | ∞   |
| Linearity   | E.2.4                    | 0.3   | Ν     | 1      | 1    | 1      | 0.3            | 0.3            | ∞   |
| System Detection Limits   | E.2.4                    | 0.25  | R     | 1.732  | 1    | 1      | 0.1            | 0.1            | ∞   |
| Modulation Response   | E.2.5                    | 4.8   | R     | 1.732  | 1    | 1      | 2.8            | 2.8            | ∞   |
| Readout Electronics   | E.2.6                    | 0.3   | Ν     | 1      | 1    | 1      | 0.3            | 0.3            | ∞   |
| Response Time   | E.2.7                    | 0.8   | R     | 1.732  | 1    | 1      | 0.5            | 0.5            | ∞   |
| Integration Time  | E.2.8                    | 2.6   | R     | 1.732  | 1    | 1      | 1.5            | 1.5            | ∞   |
| RF Ambient Conditions - Noise   | E.6.1                    | 3     | R     | 1.732  | 1    | 1      | 1.7            | 1.7            | ∞   |
| RF Ambient Conditions - Reflections   | E.6.1                    | 3     | R     | 1.732  | 1    | 1      | 1.7            | 1.7            | ∞   |
| Probe Positioner Mechanical Tolerance   | E.6.2                    | 0.8   | R     | 1.732  | 1    | 1      | 0.5            | 0.5            | ∞   |
| Probe Positioning w/ respect to Phantom                                       | E.6.3                    | 6.7   | R     | 1.732  | 1    | 1      | 3.9            | 3.9            | ∞   |
| Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation | E.5                      | 4     | R     | 1.732  | 1    | 1      | 2.3            | 2.3            | ∞   |
| Test Sample Related   |                          |       |       |        |      |        |                |                |     |
| Test Sample Positioning   | E.4.2                    | 3.12  | Ν     | 1      | 1    | 1      | 3.1            | 3.1            | 35  |
| Device Holder Uncertainty   | E.4.1                    | 1.67  | Ν     | 1      | 1    | 1      | 1.7            | 1.7            | 5   |
| Output Power Variation - SAR drift measurement                                | E.2.9                    | 5     | R     | 1.732  | 1    | 1      | 2.9            | 2.9            | ∞   |
| SAR Scaling   | E.6.5                    | 0     | R     | 1.732  | 1    | 1      | 0.0            | 0.0            | ∞   |
| Phantom & Tissue Parameters   |                          |       |       |        |      |        |                |                |     |
| Phantom Uncertainty (Shape & Thickness tolerances)                            | E.3.1                    | 7.6   | R     | 1.73   | 1.0  | 1.0    | 4.4            | 4.4            | ∞   |
| Liquid Conductivity - measurement uncertainty                                 | E.3.3                    | 4.3   | Ν     | 1      | 0.78 | 0.71   | 3.3            | 3.0            | 76  |
| Liquid Permittivity - measurement uncertainty                                 | E.3.3                    | 4.2   | Ν     | 1      | 0.23 | 0.26   | 1.0            | 1.1            | 75  |
| Liquid Conductivity - Temperature Uncertainty                                 | E.3.4                    | 3.4   | R     | 1.732  | 0.78 | 0.71   | 1.5            | 1.4            | ∞   |
| Liquid Permittivity - Temperature Unceritainty                                | E.3.4                    | 0.6   | R     | 1.732  | 0.23 | 0.26   | 0.1            | 0.1            | ∞   |
| Liquid Conductivity - deviation from target values                            | E.3.2                    | 5.0   | R     | 1.73   | 0.64 | 0.43   | 1.8            | 1.2            | ∞   |
| Liquid Permittivity - deviation from target values                            | E.3.2                    | 5.0   | R     | 1.73   | 0.60 | 0.49   | 1.7            | 1.4            | ∞   |
| Combined Standard Uncertainty (k=1)   | 1                        |       | RSS   | 1      |      | 1      | 12.2           | 12.0           | 191 |
| Expanded Uncertainty  | Expanded Uncertainty k=2 |       |       |        |      |        | 24.4           | 24.0           |     |
| 95% CONFIDENCE LEVEL)   |                          |       |       |        |      |        |                |                |     |

The above measurement uncertainties are according to IEEE Std. 1528-2013

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### 13 CONCLUSION

#### 13.1 **Measurement Conclusion**

The SAR evaluation indicates that the EUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g., ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g., age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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