

FCC SAR Test Report

Applicant: NANOGRID LIMITED

EUT Description: Nanoleaf Sense+ Smart Button

Model: NL44

Brand: Nanoleaf

FCC ID: 2AEWY- NL44

Standards: FCC 47CFR §2.1093

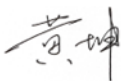
Date of Receipt: 2024/08/01

Date of Test: 2024/08/06

Date of Issue: 2024/08/08

TOWE. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

the results documented in this report apply only the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility assure that additional production units of the model are manufactured with identical electrical and mechanical components. All sample tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise. without written approval of TOWE, the test report shall not be reproduced except in full.



Huang Kun
Approved By:



Li Wei
Reviewed By:

Revision History

Rev.	Issue Date	Description	Revised by
01	2024/08/08	Original	Li Wei

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1 Summary of Test Results

Band	Highest SAR _{1g} (W/kg)
	Body 0mm
BLE	0.12
SAR Limited(W/kg)	1.6

2 Guidance Applied

FCC 47CFR §2.1093

ANSI/IEEE C95.1-1992

IEEE 1528-2013

FCC KDB 447498 D01 General RF Exposure Guidance v06

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04

FCC KDB 865664 D02 RF Exposure Reporting v01r02

3 Lab Information

3.1 Testing Location

These measurements tests were conducted at the Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. facility located at F401 and F101, Building E, Hongwei Industrial Zone, Liuxian 3rd Road, Bao'an District, Shenzhen, China. The measurement facility is compliant with the test site requirements specified in ANSI C63.4-2014

Tel.: +86-755-27212361

Contact Email: info@towewireless.com

3.2 Test Facility / Accreditations

A2LA (Certificate Number: 7088.01)

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 General requirements for the competence of testing and calibration laboratories. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).

FCC Designation No.: CN1353

Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. has been recognized as an accredited testing laboratory. Designation Number: CN1353.

ISED CAB identifier: CN0152

Sushi TOWE Wireless Testing (Shenzhen) Co., Ltd. has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0152

Company Number: 31000

3.3 Ambient Condition

Temperature: 18°C~25°C

Relative Humidity: 30%~75%

4 Client Information

4.1 Applicant

Applicant:	NANOGRID LIMITED
Address:	ROOM 1301, 13/F, EXCEL CENTRE, 483A CASTLE PEAK ROAD, LAI CHI KOK KOWLOON, Hong Kong

4.2 Manufacturer

Applicant:	NANOGRID LIMITED
Address:	ROOM 1301, 13/F, EXCEL CENTRE, 483A CASTLE PEAK ROAD, LAI CHI KOK KOWLOON, Hong Kong

5 Product Information

EUT Description	Nanoleaf Sense+ Smart Button	
Model	NL44	
Brand	Nanoleaf	
Hardware Version	V1.0	
Software Version	V1.0	
SN.	S24040U0060	
Device Capabilities:		
Band	Frequency Range (MHz)	Modulation Type
BLE	2400 ~ 2483.5	GFSK
Thread	2400 ~ 2483.5	OQPSK
Antenna Type	<input type="checkbox"/> External, <input checked="" type="checkbox"/> Integrated	
Battery Information	DC 3V by CR2477 button batteries&Lithium Coin Batteries	
Remark: The above EUT's information was declared by applicant, please refer to the specifications or user manual for more detailed description.		

5.1 Antenna Locations

Refer to Appendix D Test Setup Photos.

6 RF Exposure Limits

Human Exposure	Uncontrolled Environment General Population (W/kg) or (mW/g)	Controlled Environment Occupational (W/kg) or (mW/g)
Spatial Peak SAR¹ (Brain/Trunk)	1.6	8.0
Spatial Average SAR² (Whole Body)	0.08	0.4
Spatial Peak SAR³ (Hands/Feet/Ankle/Wrist)	4.0	20.0

Note:

1, 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.

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

3, 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.

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.

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.

7 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.

7.1 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 material (S/m)

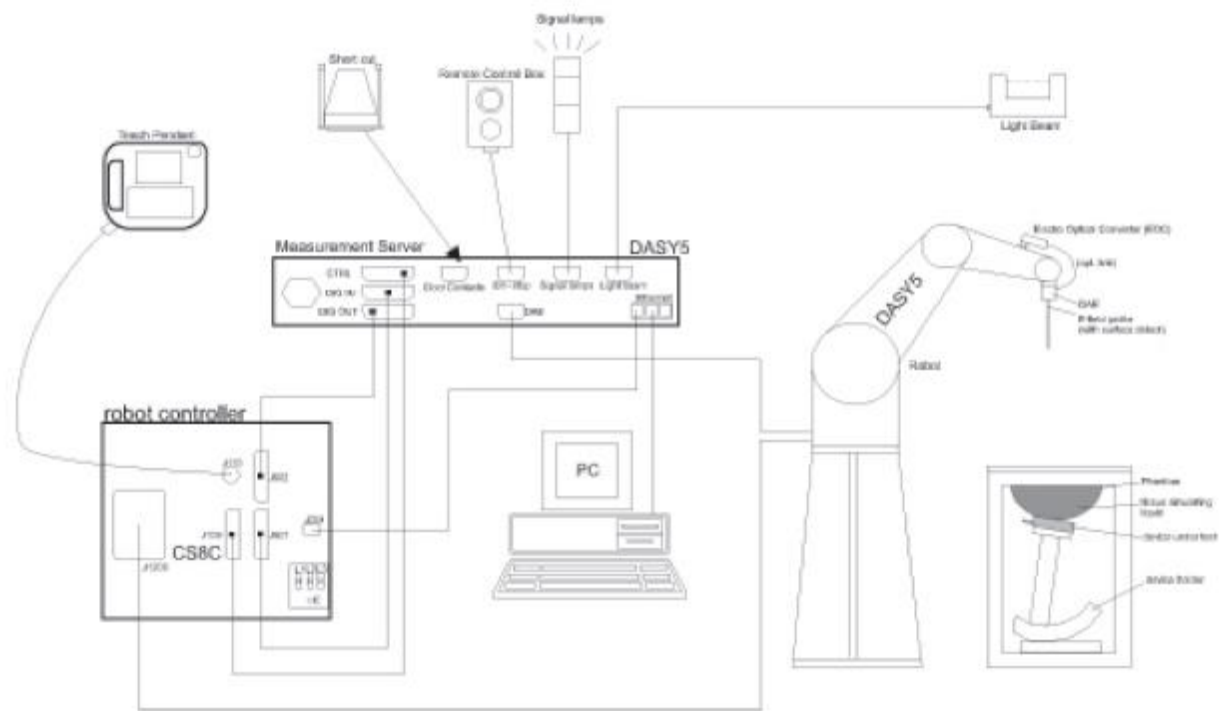
ρ is the mass density of the tissue material (kg/m³)

E is the RMS electrical field strength (V/m)

8 SAR Measurements System

8.1 The SAR Measurement Set-up

The DASY5 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 Windows 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.

8.2 Measurement procedure

8.2.1 Power reference measurement

The Power Reference Measurement and Power Drift Measurement jobs are useful jobs for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

8.2.2 Area scan

Measurement procedures for evaluating SAR from wireless handsets typically start with a coarse measurement grid to determine the approximate location of the local peak SAR values. This is known as the area-scan procedure. In addition, identify the positions of any local maxima with SAR values within 2 dB of the maximum value, and that will not be within the zoom scan of other peaks. Additional zoom scans shall be measured for such peaks only when the primary peak is within 2 dB of the SAR compliance limit.

Area scan parameters extracted from FCC KDB 865664 D01 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	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
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 \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

8.2.3 Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose 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 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz.

			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			≤ 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: $\Delta z_{\text{Zoom}}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$: 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
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm

8.2.4 Power Drift Measurement

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. Several drift measurements are possible for one reference measurement. This allows a user to monitor the power drift of the device under test that must remain within a maximum variation of $\pm 5\%$. Detail power drift measurement refer to appendix B.

9 Test Equipment list

Manufacturer	Equipment Name	Model	Serial Number	Calibration Date	Due Date of calibration
SPEAG	Twin Phantom	SAM	2168	NCR	NCR
SPEAG	E-Field Probe	EX3DV4	7858	2024/01/09	2025/01/08
SPEAG	Data Acquisition Electronics	DAE4	1846	2023/11/29	2024/11/28
SPEAG	System Validation Kits	D2450V2	1099	2023/02/02	2026/02/01
SPEAG	Dielectric parameter probes	DAK3.5	1341	2024/07/15	2025/07/14
R&S	Vector network analyzer	ZNB8	101413	2024/07/17	2025/07/16
R&S	Signal Generator	SMR20	100621	2024/03/25	2025/03/24
R&S	AVG Power Sensor	NRP-Z21	101651	2024/03/25	2025/03/24
R&S	AVG Power Sensor	NRP-Z21	104189	2024/03/25	2025/03/24
HAISIDIKE	Thermometer	TP300	TOWE-EQ-SR-023	2024/03/27	2025/03/26
BingYu	Temperature and Humidity Indicator	HTC-1	TOWE-EQ-SR-024	2024/03/26	2025/03/25
Talent Microwave	Directional Coupler	TC-05180-10S	220420003	NCR	NCR
QiJi	Amplifier	YX28982301	TOWE-EQ-SR-020	NCR	NCR

Note:

1. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged or repaired during the interval.
2. The justification data of dipole can be found in Appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

10 SAR measurement variability

SAR measurement variability must be 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.

The following procedures are applied to determine if repeated measurements are required.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only 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 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

11 Description of Test Position

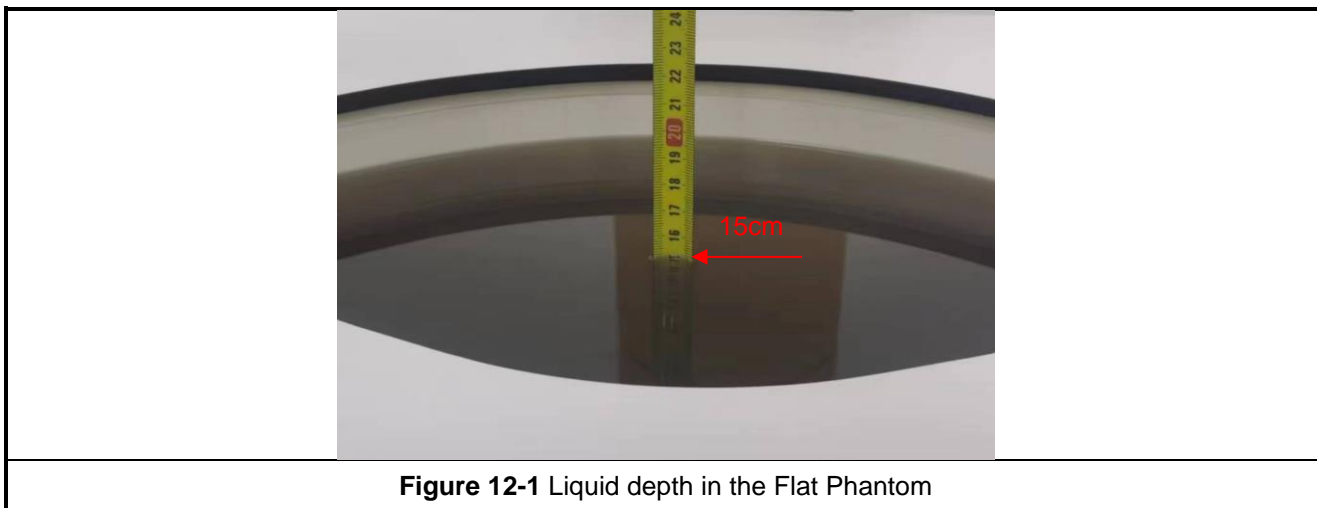
11.1 Body exposure conditions

SAR can test the sides near the antenna, the surface of the device should be tested for SAR compliance with the device touching the phantom. The SAR Exclusion Threshold in KDB 447498 D01 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent device surface is used to determine if SAR testing is required for the adjacent surfaces, with the adjacent surface positioned against the phantom and the surface containing the antenna positioned perpendicular to the phantom.

12 System Verification

12.1 Tissue Verification

The Conductivity (σ) and Permittivity (ρ) are listed in bellow table. The temperature variation of the Tissue Simulate Liquids was $22\pm 2^{\circ}\text{C}$, the liquid depth of the ear reference point or the flat phantom was at least 15 cm (which is shown in Figure 12-1).



Frequency (MHz)	Tissue Type	Liquid Temp. ($^{\circ}\text{C}$)	Target Tissue		Measured Tissue		Deviation (Limit $\pm 5\%$)		Date
			Permittivity ϵ_r	Conductivity $\sigma(\text{S/m})$	Permittivity ϵ_r	Conductivity $\sigma(\text{S/m})$	$\Delta\epsilon_r$	$\Delta\sigma$	
2450	Head	22.8	39.20	1.80	39.800	1.830	1.53%	1.67%	2024/08/06

Table 1: Measurement Tissue Parameters

12.2 SAR System Check

Prior to SAR assessment, a SAR system Check measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. The System Performance Check Setup in Figure 12-3.

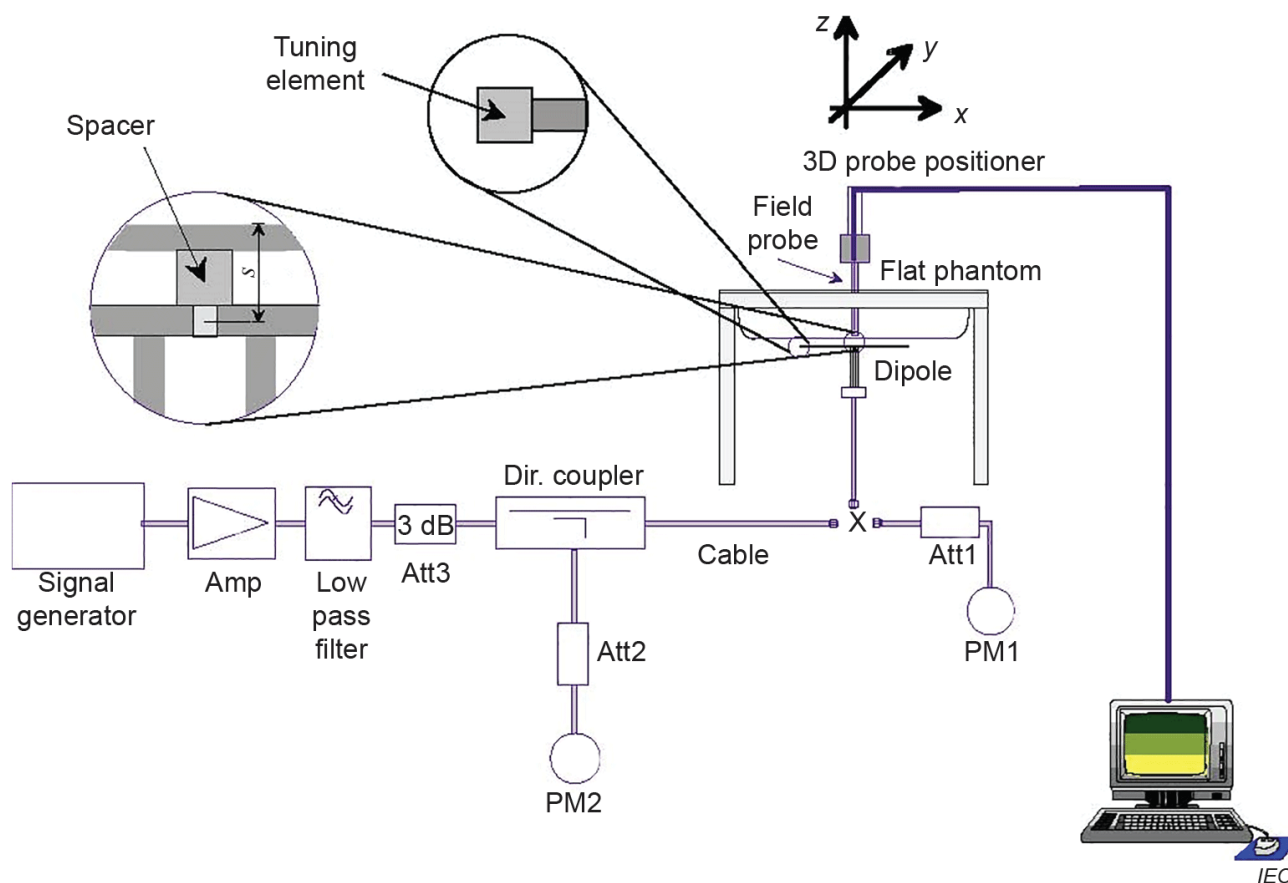


Figure 12-3 System Performance Check Setup

12.2.1 System Check Result

Frequency (MHz)	Tissue Type	Dipole	S/N	Target SAR (1W)		Measured SAR (250mW)		Measured SAR (normalized to 1W)		Deviation (Limit $\pm 10\%$)		Date
				1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	$\Delta 1g$	$\Delta 10g$	
2450	Head	D2450V2	1099	51.40	23.90	13.70	6.43	54.80	25.72	6.61%	7.62%	2024/08/06

Table 2: SAR System Check Result

12.2.2 Detailed System Check Result

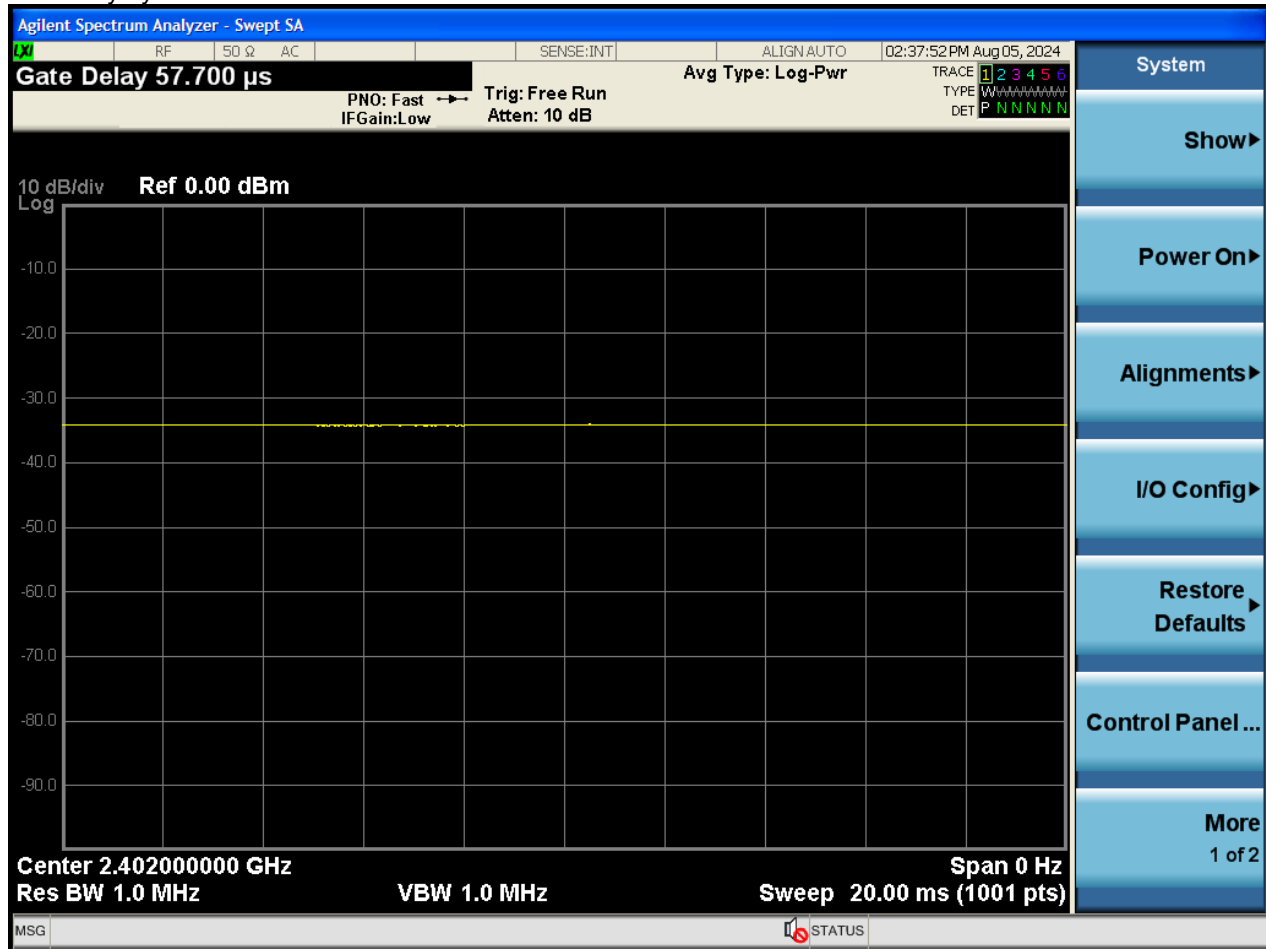
Please see the Appendix A

13 SAR General Measurement Procedures

13.1 SAR Measurement Conditions for BLE

For the BLE SAR tests, a communication link is set up with the test mode software for BLE mode test.

BLE Duty cycle=100%



14 Conducted Power

14.1 Conducted Power of BLE and Thread

Band	Ch./Freq. (MHz)	Average Conducted Power(dBm)	Tune up (dBm)
BLE 1M	0/2402	9.29	10.00
	19/2440	4.92	6.00
	39/2480	5.35	6.00

Band	Ch./Freq. (MHz)	Average Conducted Power(dBm)	Tune up (dBm)
Thread	11/2405	4.94	6.00
	18/2440	4.91	6.00
	26/2480	5.33	6.00

Note: The power of BLE is greater than the power of Thread, so only SAR tests are performed on BLE.

15 SAR Data Summary

General Notes:

- 1) The Highest Reported SAR Plot refer to Appendix B.
- 2) Per KDB 447498 D01, testing of other required channels within the operating mode of a frequency band is not required when the reported 1g or 10g SAR for the mid-band or highest output power channel is:
 - $\leq 0.8\text{W/kg}$ for 1g or 2.0W/kg for 10g respectively, when the transmission band is $\leq 100\text{MHz}$.
 - $\leq 0.6\text{ W/kg}$ or 1.5 W/kg , for 1g or 10g respectively, when the transmission band is between 100 MHz and 200MHz.
 - $\leq 0.4\text{ W/kg}$ or 1.0 W/kg , for 1g or 10g respectively, when the transmission band is $\geq 200\text{MHz}$.

15.1 SAR Measurement Result of BLE

BLE Test Results										
Test position	Mode	Ch./Freq. (MHz)	SAR (W/kg) 1g	Power Drift (dB)	Duty Cycle	Duty Cycle Scaling Factor	Conducted Power (dBm)	Tune up Limit(dBm)	Scaling Factor	Reported 1g SAR (W/kg)
Body 0mm										
Front side	BLE 1M	0/2402	0.060	-0.010	100.00%	1.000	9.29	10.00	1.178	0.071
Back side	BLE 1M	0/2402	0.035	-0.020	100.00%	1.000	9.29	10.00	1.178	0.041
Left side	BLE 1M	0/2402	0.099	-0.100	100.00%	1.000	9.29	10.00	1.178	0.117
Right side	BLE 1M	0/2402	0.009	-0.070	100.00%	1.000	9.29	10.00	1.178	0.011
Top side	BLE 1M	0/2402	0.052	-0.060	100.00%	1.000	9.29	10.00	1.178	0.061
Bottom side	BLE 1M	0/2402	< 0.001	0.000	100.00%	1.000	9.29	10.00	1.178	< 0.001
Left side	BLE 1M	19/2440	0.048	-0.170	100.00%	1.000	4.92	6.00	1.282	0.062
Left side	BLE 1M	39/2480	0.041	0.030	100.00%	1.000	5.35	6.00	1.161	0.048

Table 3: SAR of BLE.

16 Measurement Uncertainty

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.

17 Calibration Certificate

Please see the Appendix C

18 Test Setup Photos

Please see the Appendix D

Appendix A: System Check Plots

Appendix B: SAR Test Plots

Appendix C: Calibration certificate

Appendix D: Test Setup Photos

--- The End ---
