FCC SAR TEST REPORT

Application No:	SEWM2210000212RG
Applicant:	VTech Telecommunications Ltd.
Manufacturer:	VTech Telecommunications Ltd.
Product Name:	Baby monitor
Model No.(EUT):	LF1726FHD PU LF1726-2FHD PU
Trade Mark:	Leap frog
FCC ID:	EW780-2950-01
Standards:	FCC 47CFR §2.1093
Date of Receipt:	2022-10-24
Date of Test:	2022-10-27 to 2022-10-27
Date of Issue:	2022-10-28
Test Result:	**PASS ***

* In the configuration tested, the EUT detailed in this report complied with the standards specified above.

Authorized Signature:

Panta Sun

Wireless Laboratory Manager

REVISION HISTORY

Revision Record				
Version	**Chapter**	**Date**	**Modifier**	**Remark**
01		2022-10-28		Original

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TEST SUMMARY

Frequency Band	Test position	Max Report SAR1-g (W/kg)	SAR limit (W/kg)	Verdict
802.11ah	Body	0.71	1.6	PASS

Reviewed by

Well Wei

Well Wei

Prepared by

Nick Hu

Nick Hu

CONTENTS

1 General Information

1.1 Details of Client

Applicant:	VTech Telecommunications Ltd.
Address:	23/F, Tai Ping Industrial Centre, Block 1,57 Ting Kok Road, Tai Po, Hong Kong
Manufacturer:	VTech Telecommunications Ltd.
Address:	23/F, Tai Ping Industrial Centre, Block 1,57 Ting Kok Road, Tai Po, Hong Kong

1.2 Test Location

Company:	SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd.
Address:	South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu) Pilot Free Trade Zone
Post code:	215000
Test Engineer:	Leon-Xu

1.3 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

• A2LA (Certificate No. 6336.01)

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 6336.01.

• Innovation, Science and Economic Development Canada

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0120.

IC#: 27594.

• FCC –Designation Number: CN1312

SGS-CSTC STANDARDS TECHNICAL SERVICES (SUZHOU) CO., LTD. has been recognized as an accredited testing laboratory.

Designation Number: CN1312.

Test Firm Registration Number: 717327

1.4 General Description of EUT

Product Name:	Baby monitor	
Model No.(EUT):	LF1726FHD PU LF1726-2FHD PU	
Trade Mark:	Leap frog	
Product Phase:	production unit	
Device Type:	portable device	
Exposure Category:	uncontrolled environment / general population	
SN:	A1	
FCC ID:	EW780-2950-01	
Hardware Version	V1.1	
Software Version	RC01	
Antenna Type:	FPC Antenna	
Device Operating Configurations:		
Modulation Mode:	**WIFI:** 802.11ah	
Frequency Bands:	Band	Tx (MHz)
	908MHz to 924MHz	908~924
Battery Information:	Model No.:	YB906085-5Ah-3.7V-1S1P
	Normal Voltage:	3.7V
	Rated capacity:	5000mAh 18.5Wh
	Manufacturer:	Guang Dong YungBang New Energy Co.,Ltd

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1.5 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE Std C95.1 – 1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 248227 D01	SAR Guidance for IEEE 802 11 Wi-Fi SAR v02r02
KDB 447498 D01 v06	General RF Exposure Guidance
KDB 616217 D04	SAR for laptop and tablets v01r02
KDB 865664 D01 v01r04	SAR Measurement 100 MHz to 6 GHz
KDB 865664 D02 v01r02	RF Exposure Reporting

1.6 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	**1.60 W/Kg**	8.00 W/Kg
Spatial Average SAR** (Whole Body)	0.08 W/Kg	0.40 W/Kg
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 W/Kg	20.00 W/Kg

Notes:

* 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.

*** 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.

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.)

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2 SAR Measurements System Configuration

2.1 The SAR Measurement System

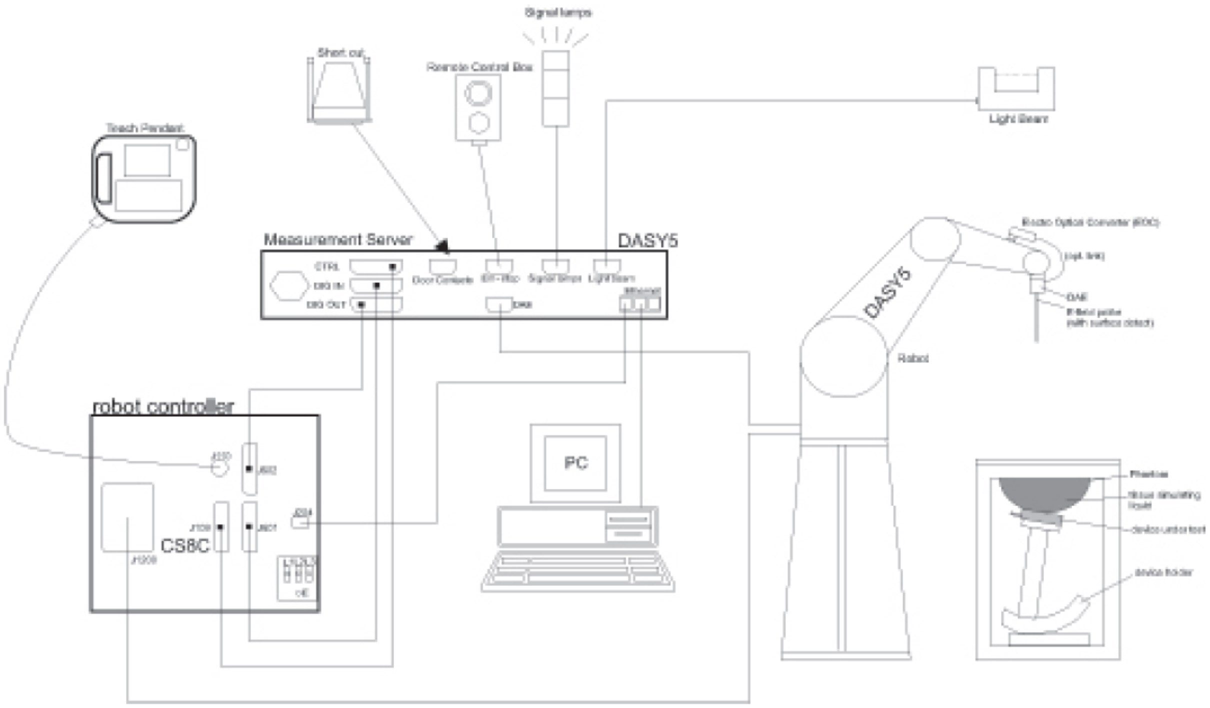
This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY5 professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

The DASY5 system for performing compliance tests consists of the following items:
A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software .An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition 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 between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.



F-1. SAR Measurement System Configuration

- 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.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7.
- DASY5 software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.

2.2 Isotropic E-field Probe EX3DV4

	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available.
Frequency	10 MHz to > 6 GHz Linearity: ± 0.2 dB (30 MHz to 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 µW/g to > 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 µW/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
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
Compatibility	DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

2.3 Data Acquisition Electronics (DAE)

Model	DAE
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)
Input Offset Voltage	< 5μV (with auto zero)
Input Bias Current	< 50 f A
Dimensions	60 x 60 x 68 mm

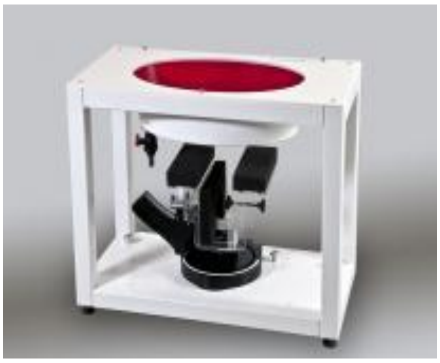
2.4 SAM Twin Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet
Filling Volume	approx. 25 liters
Wooden Support	SPEAG standard phantom table

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.

2.5 ELI Phantom

Material	Vinylester, glass fiber reinforced (VE-GF)	
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	
Wooden Support	SPEAG standard phantom table	

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.

ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4, but has reinforced top structure.

2.6 Device Holder for Transmitters

F-2. **Device Holder for Transmitters**

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity ε=3 and loss tangent δ=0.02. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

2.7 Measurement procedure

2.7.1 Scanning procedure

Step 1: Power reference measurement

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure.

Step 2: *Area scan*

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm.Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: *Zoom scan*

Around this point, a volume of 30mm*30mm*30mm (fine resolution volume scan, zoom scan) was assessed by measuring 5x5x7 points (≤2GHz) and 7x7x7 points (≥2GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification).The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straight-forward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

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

<table>
<tr><td colspan="3"></td><td>≤ 3 GHz</td><td>> 3 GHz</td></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5 ± 1 mm</td><td>½·δ·ln(2) ± 0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30° ± 1°</td><td>20° ± 1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}</td><td>≤ 2 GHz: ≤ 15 mm
2 – 3 GHz: ≤ 12 mm</td><td>3 – 4 GHz: ≤ 12 mm
4 – 6 GHz: ≤ 10 mm</td></tr>
<tr><td colspan="2">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.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}</td><td>≤ 2 GHz: ≤ 8 mm
2 – 3 GHz: ≤ 5 mm*</td><td>3 – 4 GHz: ≤ 5 mm*
4 – 6 GHz: ≤ 4 mm*</td></tr>
<tr><td rowspan="3">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2">uniform grid: $\Delta z_{Zoom}(n)$</td><td>≤ 5 mm</td><td>3 – 4 GHz: ≤ 4 mm
4 – 5 GHz: ≤ 3 mm
5 – 6 GHz: ≤ 2 mm</td></tr>
<tr><td rowspan="2">graded grid</td><td>$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface</td><td>≤ 4 mm</td><td>3 – 4 GHz: ≤ 3 mm
4 – 5 GHz: ≤ 2.5 mm
5 – 6 GHz: ≤ 2 mm</td></tr>
<tr><td>$\Delta z_{Zoom}(n>1)$: between subsequent points</td><td colspan="2">≤ 1.5·$\Delta z_{Zoom}(n-1)$</td></tr>
<tr><td>Minimum zoom scan volume</td><td colspan="2">x, y, z</td><td>≥ 30 mm</td><td>3 – 4 GHz: ≥ 28 mm
4 – 5 GHz: ≥ 25 mm
5 – 6 GHz: ≥ 22 mm</td></tr>
<tr><td colspan="5">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 <u>reported</u> SAR from the area scan based 1-g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.</td></tr>
</table>

Step 4: Power reference measurement (drift)

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 indicated drift is mainly the variation of the DUT's output power and should vary max. ± 5 %

2.7.2 Data Storage

The DASY software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “DAE”. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated. The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [m W/g], [m W/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

2.7.3 Data Evaluation by SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters: - Sensitivity Normi, ai0, ai1, ai2
- Conversion factor ConvFi
- Diode compression point Dcpi
Device parameters: - Frequency f
- Crest factor cf
Media parameters: - Conductivity ε
- Density ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power.

The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

With Vi = compensated signal of channel i (i = x, y, z)

Ui = input signal of channel i (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp i = diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes:

$$E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$$

H-field probes:

$$H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1} f + a_{i2} f^2) / f$$

With Vi = compensated signal of channel i (i = x, y, z)
Normi = sensor sensitivity of channel I (i = x, y, z)
[mV/(V/m)2] for E-field Probes
ConvF = sensitivity enhancement in solution
aij = sensor sensitivity factors for H-field probes
f = carrier frequency [GHz]
Ei = electric field strength of channel i in V/m

Hi = magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = (E_x^2 + E_Y^2 + E_z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$SAR = (Etot^2 \cdot \sigma) / (\varepsilon \cdot 1000)$$

with SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

σ= conductivity in [mho/m] or [Siemens/m]

ε= equivalent tissue density in g/cm3

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}{}^2{}_2 / 3770 \quad \text{or} \quad P_{pwe} = H_{tot}{}^2 \cdot 37.7$$

with Ppwe = equivalent power density of a plane wave in mW/cm2
Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m

3 Description of Test Position

3.1 Body Exposure Condition

The overall diagonal dimension of the tablet is > 20 cm.

Per FCC KDB 616217 D04, a composite test separation distance of 0 mm is applied to test tablet transmitters and to maintain RF exposure conservativeness for the interactive operations associated with this type of devices.

4 SAR System Verification Procedure

4.1 Tissue Simulate Liquid

4.1.1 Recipes for Tissue Simulate Liquid

The bellowing tables give the recipes for tissue simulating liquids to be used in different frequency bands：

Ingredients (% by weight)	Frequency (MHz)				
	450	700-900	1800-2000	2300-2500	2500-2700
Water	38.56	40.30	55.24	55.00	54.92
Salt (NaCl)	3.95	1.38	0.31	0.2	0.23
Sucrose	56.32	57.90	0	0	0
HEC	0.98	0.24	0	0	0
Bactericide	0.19	0.18	0	0	0
Tween	0	0	44.45	44.80	44.85

Salt: 99^{+}% Pure Sodium Chloride

Sucrose: 98^{+}% Pure Sucrose

Water: De-ionized, 16 MΩ^{+} resistivity

HEC: Hydroxyethyl Cellulose

Tween: Polyoxyethylene (20) sorbitan monolaurate

HSL5GHz is composed of the following ingredients：

Water：50-65%

Mineral oil：10-30%

Emulsifiers：8-25%

Sodium salt：0-1.5%

Table 1： Recipe of Tissue Simulate Liquid

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4.1.2 Measurement for Tissue Simulate Liquid

The Conductivity (σ) and Permittivity (ρ) are listed in Table 2. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was 22±2°C.

Tissue Type	Measured Frequency（MHz）	Target Tissue (±5%)		Measured Tissue		Liquid Temp.	Test Date
		ε_r	σ(S/m)	ε_r	σ(S/m)	(℃)	
835 Head	835	41.5 (39.43~43.58)	0.90 (0.86~0.95)	41.767	0.909	22.6	2022/10/27

Table 2： Measurement result of Tissue electric parameters

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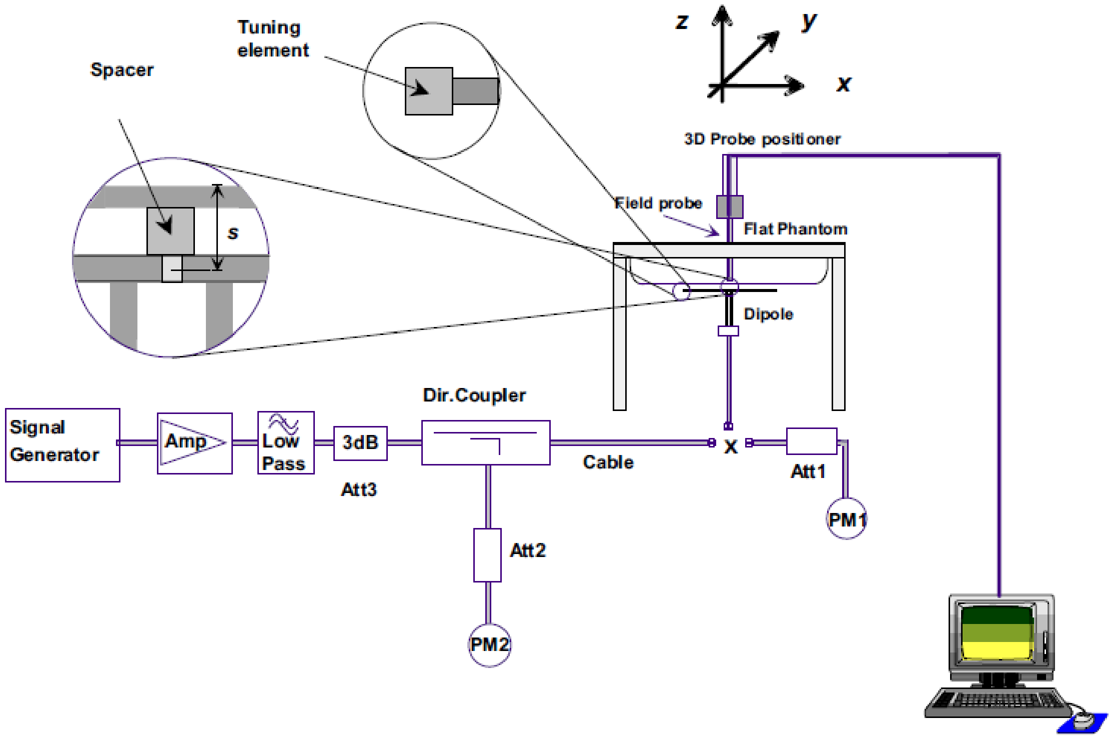
4.2 SAR System Check

The microwave circuit arrangement for system Check is sketched in F-3. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table (A power level of 250mW (below 3GHz) or 100mW (3-6GHz) was input to the dipole antenna). During the tests, the ambient temperature of the laboratory was in the range 22±2°C, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above 15±0.5 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



F-3. the microwave circuit arrangement used for SAR system check

4.2.1 Justification for Extended SAR Dipole Calibrations

1) Referring to KDB865664 D01 requirements for dipole calibration, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
a) There is no physical damage on the dipole;
b) System check with specific dipole is within 10% of calibrated value;
c) Return-loss is within 10% of calibrated measurement;
d) Impedance is within 5Ω from the previous measurement.

2) Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

4.2.2 Summary System Check Result(s)

Validation Kit		Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1W)	Measured SAR (normalized to 1W)	Target SAR (normalized to 1W)	Target SAR (normalized to 1W)	Deviation (Within ±10%)		Liquid Temp. (℃)	Test Date
		1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)	1-g(W/kg)	10-g(W/kg)		
D835V2	Head	2.26	1.48	9.04	5.92	9.64	6.29	-6.22%	-5.88%	22.6	2022/10/27

Table 3： SAR System Check Result

4.2.3 Detailed System Check Results

Please see the Appendix A

5 Test results and Measurement Data

5.1 Operation Configurations

5.1.1 WiFi 802.11ah Test Configuration

For 802.11ah Band operation does not have the fixed UL/DL frame structure, but during the transmitting/ receiving it can be operated in the slot structure of 100% UL duty cycle, we are proposing the conservative way to evaluate SAR at 100% duty cycle. For the purpose of test 802.11ah Band standalone SAR, and also test SAR level at 100% TX duty cycle.

5.1.1.1 Subsequent Test Configuration Procedures

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. The initial test position procedure is applied to next to the ear, UMPC mini-tablet and hotspot mode configurations. When the same maximum output power is specified for multiple transmission modes, additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. The subsequent test configuration and SAR measurement procedures are described in the following.

1）. When SAR test exclusion provisions of KDB Publication 447498 are applicable and SAR measurement is not required for the initial test configuration, SAR is also not required for the next highest maximum output power transmission mode subsequent test configuration(s) in that frequency band or aggregated band and exposure configuration.

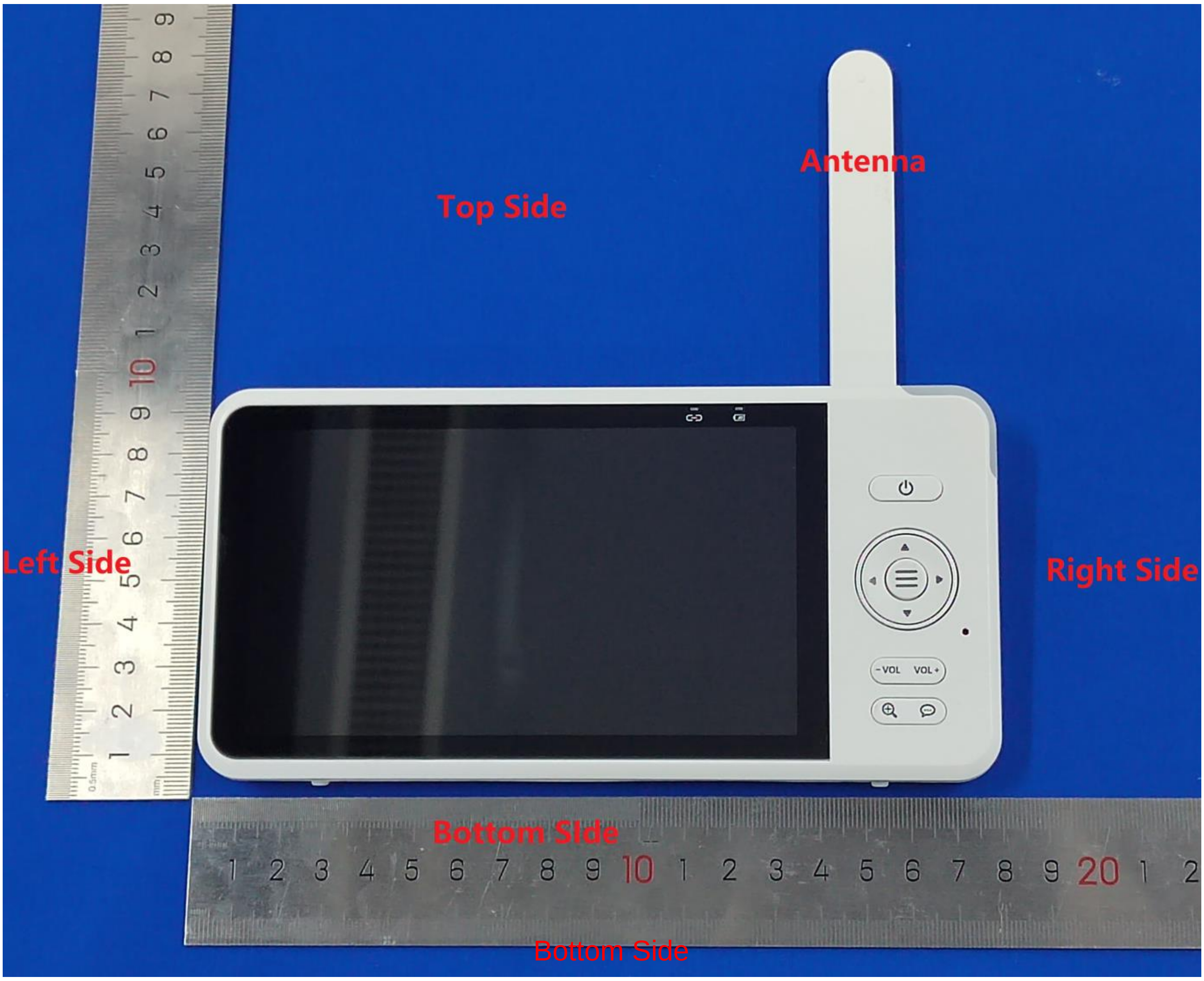
2）. When the highest *reported* SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

3）. The number of channels in the initial test configuration and subsequent test configuration can be different due to differences in channel bandwidth. When SAR measurement is required for a subsequent test configuration and the channel bandwidth is smaller than that in the initial test configuration, all channels in the subsequent test configuration that overlap with the larger bandwidth channel tested in the initial test configuration should be used to determine the highest maximum output power channel. This step requires additional power measurement to identify the highest maximum output power channel in the subsequent test configuration to determine SAR test reduction.

   a) SAR should first be measured for the channel with highest measured output power in the subsequent test configuration.

   b) SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the *reported* SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is > 1.2 W/kg or until all required channels are tested. i) For channels with the same measured maximum output power, SAR should be measured using the channel closest to the center frequency of the larger channel bandwidth channel in the initial test configuration.

5.1.2 DUT Antenna Locations(Front View)



5.1.3 Stand-alone SAR test evaluation

Unless specifically required by the published RF exposure KDB procedures, standalone 1-g body SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.

Freq. Band	Frequency (GHz)	Position	Average Power		Test Separation (mm)	Calculate Value	Exclusion Threshold	Exclusion (Y/N)
			dBm	mW				
WiFi 802.11ah	942	Body	28.5	707.95	5	136.10	3	N

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:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] · [√f(GHz)] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- 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

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

1) {[Power allowed at numeric threshold for 50 mm in step a)] + [(test separation distance – 50 mm)·(f(MHz)/150)]} mW, for 100 MHz to 1500 MHz

2) {[Power allowed at numeric threshold for 50 mm in step a)] + [(test separation distance – 50 mm)·10]} mW, for > 1500 MHz and ≤ 6 GHz

1) Standalone SAR exclusion calculation

Exposure Position	Wireless Interface	802.11ah
	Calculated Frequency	924MHz
	Maximum power (dBm)	28.50
	Maximum rated power(mW)	708.0
Front Side	Separation distance(mm)	5.0
	exclusion threshold	136.1
	Testing required?	Yes
Back Side	Separation distance(mm)	5.0
	exclusion threshold	136.1
	Testing required?	Yes
Top Side	Separation distance(mm)	5.0
	exclusion threshold	136.1
	Testing required?	Yes
Right Side	Separation distance(mm)	20.0
	exclusion threshold	34.0
	Testing required?	Yes
Bottom Side	Separation distance(mm)	71.0

	exclusion threshold	285.0
	Testing required?	Yes
Left Side	Separation distance(mm)	51.0
	exclusion threshold	162.0
	Testing required?	Yes

5.2 Measurement of RF conducted Power

5.2.1 Conducted Power of 802.11ah

DUT Frequency (MHz)	Gated Level (dBm)	Tune Up
908	27.00	28.50
916	27.30	28.50
924	27.20	28.50

Table 4： Conducted Power of 802.11ah

5.3 Measurement of SAR Data

5.3.1 SAR Result of 802.11ah

Test Record										
Test position	**Test mode**	**Test Freq.**	**Duty Cycle**	**SAR (W/kg) 1-g**	**Power drift (dB)**	**Conducted Power(dBm)**	**Tune up Limit(dBm)**	**Scaled factor**	**Scaled SAR 1-g (W/kg)**	**Liquid Temp.(℃)**
Body Test data With antenna closed(Separate 0mm)										
Front side	802.11ah	916	1:1	0.010	0.02	27.30	28.50	1.318	0.013	22.6
Back side	802.11ah	916	1:1	0.541	-0.07	27.30	28.50	**1.318**	**0.713**	22.6
Back side	802.11ah	908	1:1	0.401	0.09	27.00	28.50	1.413	0.566	22.6
Back side	802.11ah	924	1:1	0.528	0.01	27.20	28.50	1.349	0.712	22.6
Left side	802.11ah	916	1:1	0.010	0.08	27.30	28.50	1.318	0.013	22.6
Rightt side	802.11ah	916	1:1	0.010	-0.16	27.30	28.50	1.318	0.013	22.6
Top side	802.11ah	916	1:1	0.114	0.02	27.30	28.50	1.318	0.150	22.6
Bottom side	802.11ah	916	1:1	0.010	0.04	27.30	28.50	1.318	0.013	22.6
Body Test data With external antenna(Separate 0mm)										
Front side	802.11ah	916	1:1	0.061	0.09	27.30	28.50	1.318	0.080	22.6
Back side	802.11ah	916	1:1	0.303	0.04	27.30	28.50	1.318	0.399	22.6
Back side	802.11ah	908	1:1	0.235	0.02	27.00	28.50	1.413	0.332	22.6
Back side	802.11ah	924	1:1	0.289	-0.11	27.20	28.50	1.349	0.390	22.6
Left side	802.11ah	916	1:1	0.010	0.02	27.30	28.50	1.318	0.013	22.6
Right side	802.11ah	916	1:1	0.010	-0.10	27.30	28.50	1.318	0.013	22.6
Bottom side	802.11ah	916	1:1	0.010	0.03	27.30	28.50	1.318	0.013	22.6

Table 5： SAR of 802.11ah

Note:

1) The maximum Scaled SAR value is marked in **bold**. Graph Results refer to Appendix B

6 Equipment list

Test Platform		SPEAG DASY Professional				
Description		SAR Test System				
Software Reference		DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)				
Hardware Reference						
Equipment		Manufacturer	Model	Serial Number	Calibration Date	Due date of calibration
☒	Twin Phantom	SPEAG	SAM2	1563	NCR	NCR
☒	DAE	SPEAG	DAE4	1374	2021-11-05	2022-11-04
☒	E-Field Probe	SPEAG	EX3DV4	7735	2022-08-09	2023-08-08
☒	Validation Kits	SPEAG	D835V2	4d256	2020-04-15	2023-04-14
☒	Dielectric parameter probes	SPEAG	DAKS-3.5	1120	2022-05-30	2023-05-29
☒	Vector Network Analyzer and Vector Reflectometer	SPEAG	DAKS_VNA R140	0050920	2022-05-23	2023-05-22
☒	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR
☒	Signal Generator	R&S	SMB100A	182393	2022-02-14	2023-02-13
☒	Preamplifier	Qiji	YX28980933	202104001	NCR	NCR
☒	Power Meter	Anritsu	ML2495A	2136003	2021-12-04	2022-12-03
☒	Power Sensor	Anritsu	MA2411B	1911376	2021-12-04	2022-12-03
☒	Power Sensor	Keysight	U2002H	MY5639004	2022-9-16	2023-9-15
☒	Attenuator	SHX	TS2-3dB	30704	NCR	NCR
☒	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR
☒	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR
☒	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR
☒	Speed reading thermometer	LKM	DTM3000	SUW201-30-01	2022-09-19	2023-09-18
☒	Humidity and Temperature Indicator	MingGao	MingGao	NA	2022-09-19	2023-09-18

Note: All the equipments are within the valid period when the tests are performed.

7 SAR measurement variability and uncertainty

7.1 SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, 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. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.

2) When the original highest measured SAR is ⩾ 0.80 W/kg, 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 W/kg (~ 10% from the 1-g SAR limit).

4) Perform a third repeated measurement only if the original, first or second repeated measurement is ⩾1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

7.1 SAR measurement uncertainty

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

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8 Calibration certificate

Please see the Appendix C

9 Photographs

Please see the Appendix D

Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs

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