



## SGS-CSTC Standards Technical Services (Suzhou) Co., Ltd

Report No.: SUCR241200051801

Rev.: 01

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# FCC SAR TEST REPORT

Application No.: SUCR2412000518IT  
Applicant: Wacom Co., Ltd  
Manufacturer: Wacom Co., Ltd  
Product Name: Portable Pad  
Model No.: DTHA116, DTHA116\*\*\*\*\*(" " maybe alphanumeric/symbol or blank)  
Trade Mark: Wacom  
FCC ID: HV4DTHA116  
Standards: FCC 47CFR §2.1093  
Date of Receipt: 2024-12-04  
Date of Test: 2024-12-21 to 2024-12-24  
Date of Issue: 2024-12-27  
Test conclusion: **PASS \***

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

Leon Liu

Nick Hu

Prepared by: Leon Liu/ Project Manager

Approved by: Nick HU/ Technical  
Manager (Title)

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Revision Record			
Version	Description	Date	Remark
01	Original	2024-12-27	

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### TEST SUMMARY

Frequency Band	Maximum Reported SAR(W/kg)
	Body 0mm
WI-FI (2.4GHz)	0.69
WI-FI (5GHz)	<b>1.06</b>
BT	0.10
SAR Limited(W/kg)	1.6
Maximum Simultaneous Transmission SAR (W/kg)	
Scenario	Body 0mm
Sum SAR	1.17
SPLSR	/
SPLSR Limited	0.04

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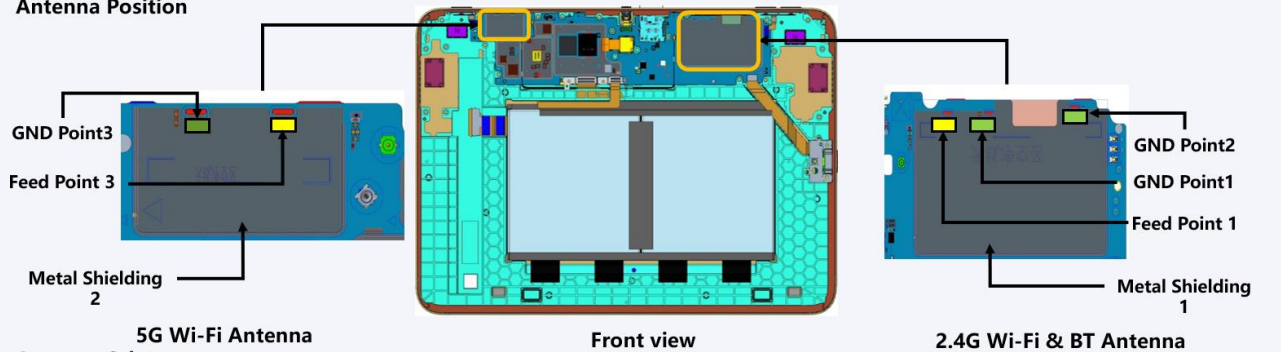
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### 1 DUT Antenna Locations (Back View)

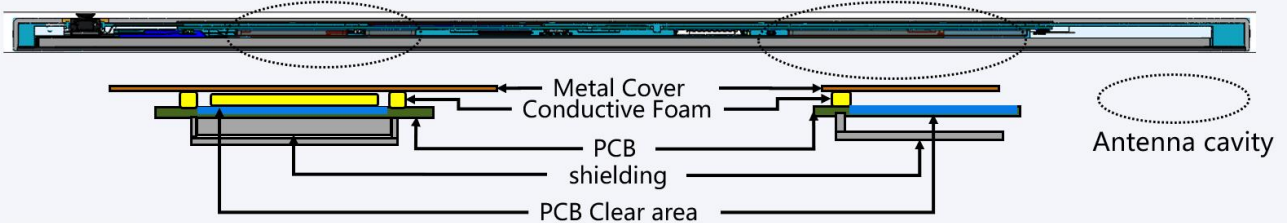
#### ANT Design —Design Overview(ANT Configuration)



##### ■ Antenna Position



##### ■ Antenna Scheme



##### HQ Comments:

The metal cover, conductive foam and shielding cover constitute an open cavity. After the power supply to the cavity, the antenna resonance is generated

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## 2 General Information

### 2.1 Details of Client

Applicant:	Wacom Co., Ltd.
Address:	2-510-1 Toyonodai, Kazo-shi, Saitama 349-1148, Japan
Manufacturer:	Wacom Co., Ltd.
Address:	2-510-1 Toyonodai, Kazo-shi, Saitama 349-1148, Japan

### 2.2 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:	Koller Chen; Liu, Leon-I

### 2.3 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

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### 2.4 General Description of EUT

Device Type :	portable device		
Exposure Category:	uncontrolled environment / general population		
Product Name:	Portable Pad		
Model No.(EUT):	DTHA116, DTHA116*****("*" maybe alphanumeric/symbol or blank)		
Trade Mark:	Wacom		
FCC ID:	HV4DTHA116		
Product Phase:	production unit		
Antenna Type:	Cavity Antenna		
Device Operating Configurations :			
Modulation Mode:	WIFI: DSSS, OFDM, OFDMA; BT: GFSK, $\pi/4$ DQPSK, 8DPSK		
Device Class:	B		
Frequency Bands:	Band	Tx (MHz)	Rx (MHz)
	Wi-Fi 2.4G	2402~2462	2402~2462
	WIFI(5GHz)	5150 - 5250	5150 - 5250
		5725 - 5850	5725 - 5850
BT	2402 - 2480	2402 - 2480	
RF Cable:	<input checked="" type="checkbox"/> Provided by the applicant <input type="checkbox"/> Provided by the laboratory		
Battery Information:	Model:	HQ-7515NA	
	Normal Voltage:	3.86V	
	Typical capacity:	7500mAh/29.85Wh	
	Manufacturer:	Ningde Ampere Technology Limited	
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### 2.5 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE 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	General RF Exposure Guidance v06
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 865664 D02	RF Exposure Reporting v01r02
KDB 690783 D01	SAR Listings on Grants v01r03
KDB 616217 D04	SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers. v01r02

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### 2.6 RF exposure limits

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

#### 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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### 3 Laboratory Environment

Temperature	Min. = 18°C, Max. = 25 °C
Relative humidity	Min. = 30%, Max. = 70%
Ambient noise is checked and found very low and in compliance with requirement of standards. Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

Table 1: The Ambient Conditions

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## 4 SAR Measurements System Configuration

### 4.1 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  $SAR = \sigma (|E|^2) / \rho$  where  $\sigma$  and  $\rho$  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).

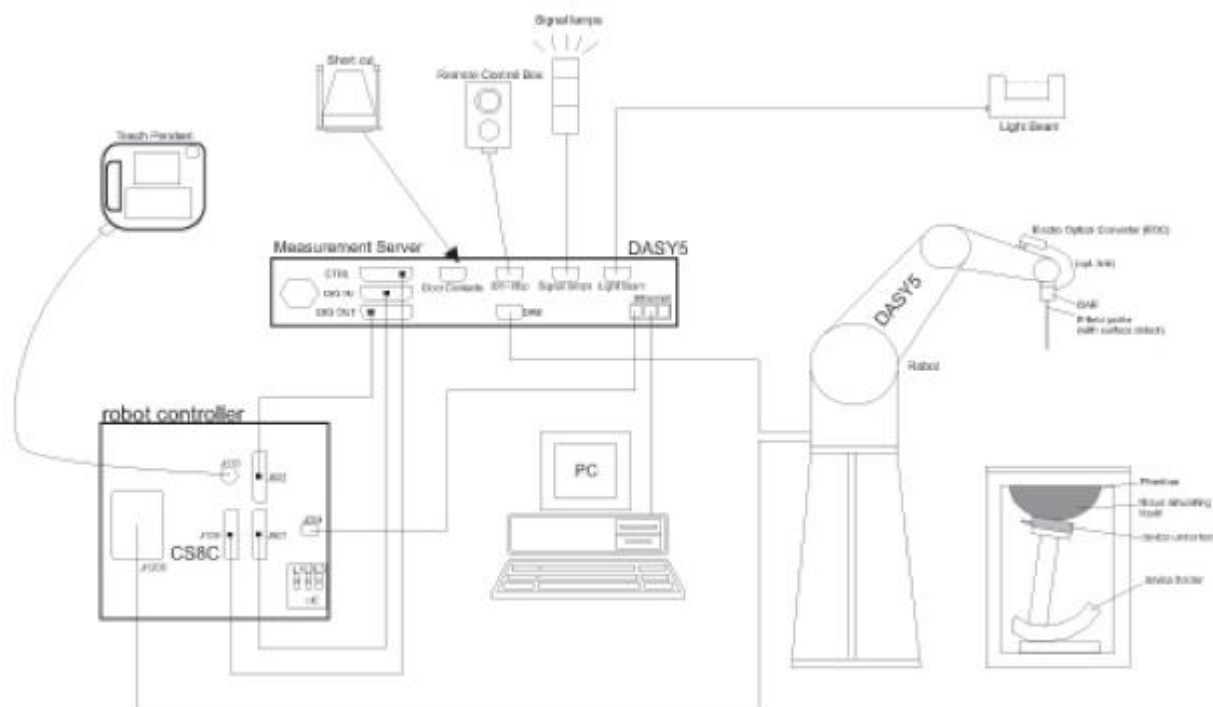
A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

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.

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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.

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### 4.2 Isotropic E-field Probe EX3DV4

	<p>Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)</p>
<b>Calibration</b>	ISO/IEC 17025 <a href="#">calibration service</a> available.
<b>Frequency</b>	10 MHz to > 6 GHz Linearity: $\pm 0.2$ dB (30 MHz to 6 GHz)
<b>Directivity</b>	$\pm 0.3$ dB in TSL (rotation around probe axis) $\pm 0.5$ dB in TSL (rotation normal to probe axis)
<b>Dynamic Range</b>	10 $\mu$ W/g to > 100 mW/g Linearity: $\pm 0.2$ dB (noise: typically < 1 $\mu$ W/g)
<b>Dimensions</b>	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
<b>Application</b>	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%.
<b>Compatibility</b>	DASY52 SAR and higher, EASY4/MRI


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## 4.3 Data Acquisition Electronics (DAE)

<b>Model</b>	DAE	
<b>Construction</b>	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.	
<b>Measurement Range</b>	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
<b>Input Offset Voltage</b>	< 5μV (with auto zero)	
<b>Input Bias Current</b>	< 50 f A	
<b>Dimensions</b>	60 x 60 x 68 mm	

## 4.4 SAM Twin Phantom

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

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## 4.5 ELI Phantom

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

The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 4 MHz to 10 GHz. ELI is fully compatible with the IEC/IEEE 62209-1528 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 of SPEAG's dosimetric probes and dipoles.

ELI V5.0 and higher has the same shell geometry and is manufactured from the same material as ELI V4.0 but has a reinforced top structure.

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## 4.6 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  $\epsilon=3$  and loss tangent  $\delta=0.02$ . 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.

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### 4.7 Measurement procedure

#### 4.7.1 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 32mm\*32mm\*30mm ( $f \leq 2\text{GHz}$ ), 30mm\*30mm\*30mm ( $f$  for 2-3GHz) and 24mm\*24mm\*22mm ( $f$  for 5-6GHz) was assessed by measuring 5x5x7 points ( $f \leq 2\text{GHz}$ ), 7x7x7 points ( $f$  for 2-3GHz) and 7x7x12 points ( $f$  for 5-6GHz). 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.

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		$\leq 3 \text{ GHz}$	$> 3 \text{ GHz}$
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		$5 \pm 1 \text{ mm}$	$\frac{1}{4} \cdot \delta \cdot \ln(2) \pm 0.5 \text{ mm}$
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: $\Delta x_{Area}$ , $\Delta y_{Area}$		$\leq 2 \text{ GHz: } \leq 15 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 12 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 12 \text{ mm}$ $4 - 6 \text{ GHz: } \leq 10 \text{ mm}$
		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.	
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$		$\leq 2 \text{ GHz: } \leq 8 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz: } \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 4 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 3 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$
	graded grid $\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 3 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$
	$\Delta z_{Zoom}(n>1)$ : between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z	$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz: } \geq 28 \text{ mm}$ $4 - 5 \text{ GHz: } \geq 25 \text{ mm}$ $5 - 6 \text{ GHz: } \geq 22 \text{ mm}$

### 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.  $\pm 5\%$

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Wireless Laboratory

South of No. 6 Plant, No. 1, Runsheng Road, Suzhou Industrial Park, Suzhou Area, China (Jiangsu) Pilot Free Trade Zone 215000 t (86-512) 62992980 [www.sgsgroup.com.cn](http://www.sgsgroup.com.cn)

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### 4.7.2 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 ".DAE4". 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.

### 4.7.3 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  $V_i$  = compensated signal of channel  $i$  ( $i = x, y, z$ )

$U_i$  = 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:

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

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H-field probes:

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

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

Normi = sensor sensitivity of channel  $i$  ( $i = x, y, z$ )

[mV/(V/m)<sup>2</sup>] for E-field Probes

ConvF = sensitivity enhancement in solution

$a_{ij}$  = sensor sensitivity factors for H-field probes

$f$  = carrier frequency [GHz]

$E_i$  = electric field strength of channel  $i$  in V/m

$H_i$  = 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.

$$SAR = (E_{tot}^2 \cdot \sigma) / (\epsilon \cdot 1000)$$

with SAR = local specific absorption rate in mW/g

$E_{tot}$  = total field strength in V/m

$\sigma$  = conductivity in [mho/m] or [Siemens/m]

$\epsilon$  = equivalent tissue density in g/cm<sup>3</sup>

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.

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

with  $P_{pwe}$  = equivalent power density of a plane wave in mW/cm<sup>2</sup>

$E_{tot}$  = total electric field strength in V/m

$H_{tot}$  = total magnetic field strength in A/m

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## 5 SAR measurement variability and uncertainty

### 5.1 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  $\geq 0.80$  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  $\geq 1.45$  W/kg ( $\sim 10\%$  from the 1-g SAR limit).
  - 4) Perform a third repeated measurement only if the original, first or second repeated measurement is  $\geq 1.5$  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.

### 5.2 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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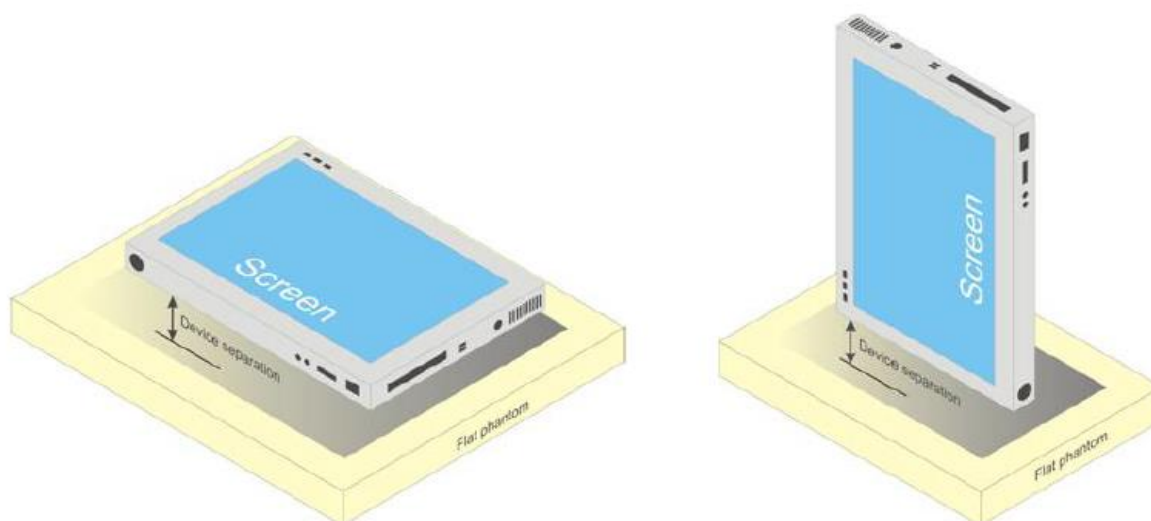
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## 6 Description of Test Position

### 6.1 Exposure Condition

#### 6.1.1 The Body Test Position

The overall diagonal dimension of the display section of a tablet is > 20 cm, Per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. SAR evaluation for the front surface of tablet display screens are generally not necessary. 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 tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.



F-3. Tablet form factor portable computer.

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## 7 SAR System Verification Procedure

### 7.1 Tissue Simulate Liquid

#### 7.1.1 Recipes for Tissue Simulate Liquid

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

Ingredients (% by weight)	Frequency (MHz)				
	450	700-900	1750-2000	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 Water: De-ionized, 16 MΩ <sup>+</sup> resistivity Tween: Polyoxyethylene (20) sorbitan monolaurate					
Sucrose: 98+% Pure Sucrose HEC: Hydroxyethyl Cellulose					
HSL5GHz is composed of the following ingredients: Water: 50-65% Mineral oil: 10-30% Emulsifiers: 8-25% Sodium salt: 0-1.5%					

Table 2: Recipe of Tissue Simulate Liquid

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### 7.1.2 Measurement for Tissue Simulate Liquid

The Conductivity ( $\sigma$ ) and Permittivity ( $\rho$ ) are listed in bellow table. For the SAR measurement given in this report. The temperature variation of the Tissue Simulate Liquids was  $22\pm 2^{\circ}\text{C}$ .

Measurement for Tissue Simulate Liquid						
Tissue Type	Measured Frequency (MHz)	Target Tissue ( $\pm 5\%$ )		Measured Tissue		Liquid Temp. ( $^{\circ}\text{C}$ )
		$\epsilon_r$	$\sigma(\text{S/m})$	$\epsilon_r$	$\sigma(\text{S/m})$	
2450 Head	2450	39.20 (37.24~41.16)	1.80 (1.71~1.89)	38.563	1.824	22.2
5250 Head	5250	35.9 (34.11~37.70)	4.71 (4.47~4.95)	36.536	4.857	22.1
5600 Head	5600	35.5 (33.73~37.30)	5.07 (4.82~5.32)	35.668	5.249	22.1
5750 Head	5750	35.4 (33.63~37.17)	5.22 (4.96~5.48)	35.487	5.446	22.1

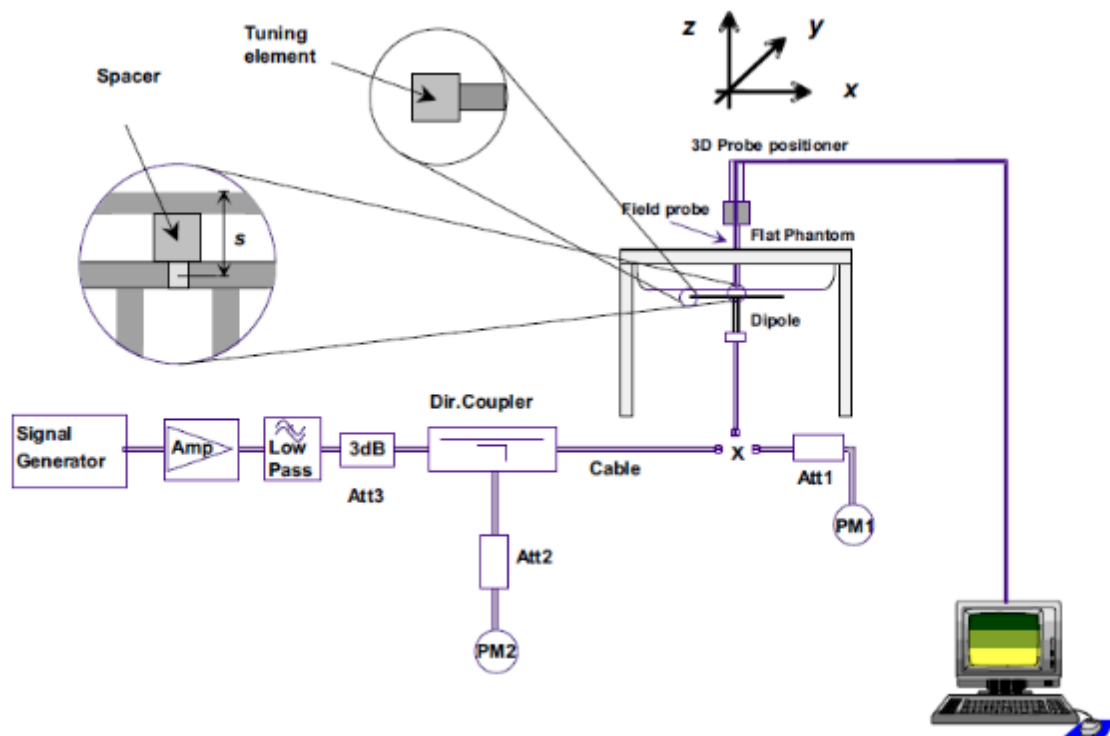
Table 3: Measurement result of Tissue electric parameters.

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### 7.2 SAR System Check

The microwave circuit arrangement for system Check is sketched in F-4. 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  $\pm 10\%$  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  $22 \pm 2^\circ\text{C}$ , the relative humidity was in the range 60% and the liquid depth above the ear reference points was above  $15 \pm 0.5\text{ cm}$  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-4. the microwave circuit arrangement used for SAR system check.

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### 7.2.1 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.

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### 7.2.2 Summary System Check Result(s)

SAR System Validation 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 $\pm 10\%$ )		Liquid Temp. ( $^{\circ}\text{C}$ )
		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)	
D2450V2	Head	13.40	6.43	53.60	25.72	52.70	24.60	1.71%	4.55%	22.2
Validation Kit		Measured SAR 100mW	Measured SAR 100mW	Measured SAR (normalized to 1W)	Measured SAR (normalized to 1W)	Target SAR (normalized to 1W)	Target SAR (normalized to 1W)	Deviation (Within $\pm 10\%$ )		Liquid Temp. ( $^{\circ}\text{C}$ )
		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)	
D5GHzV2	Head(5.25GHz)	7.56	2.12	75.60	21.20	77.20	21.90	-2.07%	-3.20%	22.1
	Head(5.6GHz)	7.88	2.18	78.80	21.80	81.10	22.80	-2.84%	-4.39%	22.1
	Head(5.75GHz)	7.84	2.17	78.40	21.70	77.80	21.70	0.77%	0.00%	22.1

Table 4: SAR System Check Result.

### 7.2.3 Detailed System Check Results

Please see the Appendix A

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## 8 Test Configuration

### 8.1 WiFi Test Configuration

A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement.

#### 8.1.1.1 Duty cycle

Wi-Fi 2.4GHz 802.11b:

Duty cycle=99.64%

Wi-Fi 5GHz 802.11a:

Duty cycle=97.48%

BT DH5

Duty cycle=77.20%

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### Initial Test Position SAR Test Reduction Procedure

DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures. The initial test position procedure is described in the following:

- 1) . When the reported SAR of the initial test position is  $\leq 0.4$  W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band. SAR is also not required for that exposure configuration in the subsequent test configuration(s).
- 2) . When the reported SAR of the initial test position is  $> 0.4$  W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position using subsequent highest extrapolated or estimated 1-g SAR conditions determined by area scans or next closest/smallest test separation distance and maximum RF coupling test positions based on manufacturer justification, on the highest maximum output power channel, until the reported SAR is  $\leq 0.8$  W/kg or all required test positions (left, right, touch, tilt or subsequent surfaces and edges) are tested.
- 3) . For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is  $> 0.8$  W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required channels are tested. a) Additional power measurements may be required for this step, which should be limited to those necessary for identifying the subsequent highest output power channels.

#### 8.1.1.2 Initial Test Configuration Procedures

An initial test configuration is determined for OFDM transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. For configurations with the same specified or measured maximum output power, additional transmission mode and test channel selection procedures are required. SAR test reduction for subsequent highest output test channels is determined according to *reported* SAR of the initial test configuration. For next to the ear, hotspot mode and UMC mini-tablet exposure configurations where multiple test positions are required, the initial test position procedure is applied to minimize the number of test positions required for SAR measurement using the initial test configuration transmission mode. For fixed exposure conditions that do not have multiple SAR test positions, SAR is measured in the transmission mode determined by the initial test configuration.

When the *reported* SAR of the initial test configuration is  $> 0.8$  W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until *reported* SAR is  $\leq 1.2$  W/kg or all required channels are tested.

#### 8.1.1.3 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

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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  $\leq 1.2$  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.
- 4) . SAR measurements for the remaining highest specified maximum output power OFDM transmission mode configurations that have not been tested in the initial test configuration (highest maximum output) or subsequent test configuration(s) (subsequent next highest maximum output power) is determined by recursively applying the subsequent test configuration procedures in this section to the remaining configurations according to the following:
  - a) replace "subsequent test configuration" with "next subsequent test configuration" (i.e., subsequent next highest specified maximum output power configuration)
  - b) replace "initial test configuration" with "all tested higher output power configurations"

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### 8.1.1.4 2.4 GHz WiFi SAR Procedures

Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band to simplify DSSS test requirements. For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions. When SAR measurement is required for an OFDM configuration, the initial test configuration, subsequent test configuration and initial test position procedures are applied. The SAR test exclusion requirements for 802.11g/n OFDM configurations are described in following.

- **802.11b DSSS SAR Test Requirements**

SAR is measured for 2.4 GHz 802.11b DSSS using either a fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:

- 1) . When the reported SAR of the highest measured maximum output power channel for the exposure configuration is  $\leq 0.8$  W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- 2) . When the reported SAR is  $> 0.8$  W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is  $> 1.2$  W/kg, SAR is required for the third channel; i.e., all channels require testing.

- **2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements**

When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied (section 5.3, including sub-sections). SAR is not required for the following 2.4 GHz OFDM conditions.

- 1) . When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration.
- 2) . When the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.

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### 8.1.1.5 WiFi 5G SAR Test Procedures

#### 8.1.1.5.1 U-NII-1 and U-NII-2A Bands

For devices that operate in only one of the U-NII-1 and U-NII-2A bands, the normally required SAR procedures for OFDM configurations are applied. For devices that operate in both U-NII bands using the same transmitter and antenna(s), SAR test reduction is determined according to the following:

- 1) When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest *reported* SAR for a test configuration is  $\leq 1.2$  W/kg, SAR is not required for U-NII-1 band for that configuration (802.11 mode and exposure condition); otherwise, both bands are tested independently for SAR.
- 2) When different maximum output power is specified for the bands, begin SAR measurement in the band with higher specified maximum output power. The highest *reported* SAR for the tested configuration is adjusted by the ratio of lower to higher specified maximum output power for the two bands. When the adjusted SAR is  $\leq 1.2$  W/kg, SAR is not required for the band with lower maximum output power in that test configuration; otherwise, both bands are tested independently for SAR.
- 3) The two U-NII bands may be aggregated to support a 160 MHz channel on channel number 50. Without additional testing, the maximum output power for this is limited to the lower of the maximum output power certified for the two bands. When SAR measurement is required for at least one of the bands and the highest *reported* SAR adjusted by the ratio of specified maximum output power of aggregated to standalone band is  $> 1.2$  W/kg, SAR is required for the 160 MHz channel. This procedure does not apply to an aggregated band with maximum output higher than the standalone band(s); the aggregated band must be tested independently for SAR. SAR is not required when the 160 MHz channel is operating at a reduced maximum power and also qualifies for SAR test exclusion.

#### 8.1.1.5.2 U-NII-2C and U-NII-3 Bands

The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. when Terminal Doppler Weather Radar (TDWR) restriction applies, all channels that operate at 5.60 – 5.65 GHz must be included to apply the SAR test reduction and measurement procedures.

When the same transmitter and antenna(s) are used for U-NII-2C band and U-NII-3 band or 5.8 GHz band of §15.247, the bands may be aggregated to enable additional channels with 20, 40 or 80 MHz bandwidth to span across the band gap, as illustrated in Appendix B. The maximum output power for the additional band gap channels is limited to the lower of those certified for the bands. Unless band gap channels are permanently disabled, they must be considered for SAR testing. The frequency range covered by these bands is 380 MHz (5.47 – 5.85 GHz), which requires a minimum of at least two SAR probe calibration frequency points to support SAR measurements. To maintain SAR measurement accuracy and to facilitate test reduction, the channels in U-NII-2C band above 5.65 GHz may be grouped with the 5.8 GHz channels in U-NII-3 or §15.247 band to enable two SAR probe calibration frequency points to cover the bands, including the band gap channels. When band gap channels are supported and the bands are not aggregated for SAR testing, band gap channels must be considered independently in each band according to the normally required OFDM SAR measurement and probe calibration frequency points requirements.

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### 8.1.1.5.3 OFDM Transmission Mode SAR Test Configuration and Channel Selection Requirements

The initial test configuration for 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple configurations in a frequency band have the same specified maximum output power, the initial test configuration is determined according to the following steps applied sequentially.

- 1) The largest channel bandwidth configuration is selected among the multiple configurations with the same specified maximum output power.
- 2) If multiple configurations have the same specified maximum output power and largest channel bandwidth, the lowest order modulation among the largest channel bandwidth configurations is selected.
- 3) If multiple configurations have the same specified maximum output power, largest channel bandwidth and lowest order modulation, the lowest data rate configuration among these configurations is selected.
- 4) When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n. After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following. These channel selection procedures apply to both the initial test configuration and subsequent test configuration(s), with respect to the default power measurement procedures or additional power measurements required for further SAR test reduction. The same procedures also apply to subsequent highest output power channel(s) selection.
  - The channel closest to mid-band frequency is selected for SAR measurement.
  - For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

### 8.1.1.5.4 SAR Test Requirements for OFDM configurations

When SAR measurement is required for 802.11 a/n/ac OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. When the same transmitter and antenna(s) are used for U-NII-1 and U-NII-2A bands, additional SAR test reduction applies. When band gap channels between U-NII-2C band and 5.8 GHz U-NII-3 or §15.247 band are supported, the highest maximum output power transmission mode configuration and maximum output power channel across the bands must be used to determine SAR test reduction, according to the initial test configuration and subsequent test configuration requirements. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

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## 9 Test Result

### 9.1 Measurement of RF Conducted Power

- 1) . The frame-averaged power is linearly proportion to the slot number configured and it is linearly scaled the maximum burst-averaged power based on time slots. The calculated method is shown as below:  
Frame-averaged power =  $10 \times \log (\text{Burst-averaged power mW} \times \text{Slot used} / 8)$
- 2) . When the maximum output power variation across the required test channels is  $> 1/2$  dB, instead of the middle channel, the highest output power channel must be used.
- 3) . For conducted power of WIFI must be measured at each transmit antenna port according to the DSSS and OFDM transmission configurations in each standalone and aggregated frequency band. For each transmission mode configuration, power must be measured for the highest and lowest channels; and at the mid-band channel(s) when there are at least 3 channels. For configurations with multiple mid-band channels, due to an even number of channels, both channels should be measured. Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units.
  - 1) When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.
  - 2) When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.
- 4) . The conducted power of BT is measured with RMS detector.

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### 9.1.1 Conducted Power of WIFI

WIFI 2.4G					
Mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11b	1	2412	1	16.61	18.50
	6	2437		16.95	18.50
	11	2462		17.04	18.50
802.11g	1	2412	6	16.99	18.50
	6	2437		17.15	18.50
	11	2462		16.93	18.50
802.11n HT20	1	2412	MCS0	14.81	16.50
	6	2437		15.17	16.50
	11	2462		14.98	16.50

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WIFI 5G						
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11a	U-NII-1	36	5180	6	13.43	14.50
		40	5200		13.42	14.50
		44	5220		13.38	14.50
		48	5240		13.39	14.50
	U-NII-2A	52	5260		13.46	14.50
		56	5280		13.42	14.50
		60	5300		13.45	14.50
		64	5320		13.50	14.50
	U-NII-2C	100	5500		13.64	14.50
		104	5520		13.53	14.50
		108	5540		13.44	14.50
		112	5560		13.34	14.50
		116	5580		13.59	14.50
		120	5600		13.13	14.50
		124	5620		13.14	14.50
		128	5640		13.28	14.50
		132	5660		13.35	14.50
		136	5680		13.42	14.50
		140	5700		13.54	14.50
		144	5720		13.52	14.50
	U-NII-3	149	5745		12.38	13.50
		153	5765		12.35	13.50
		157	5785		12.42	13.50
		161	5805		12.25	13.50
		165	5825		12.44	13.50
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11n-HT20	U-NII-1	36	5180	MCS0	13.31	14.50
		40	5200		13.33	14.50
		44	5220		13.39	14.50
		48	5240		13.36	14.50
	U-NII-2A	52	5260		13.37	14.50
		56	5280		12.91	14.50
		60	5300		13.10	14.50
		64	5320		13.21	14.50
	U-NII-2C	100	5500		13.31	14.50
		104	5520		13.17	14.50
		108	5540		13.03	14.50
		112	5560		13.23	14.50
		116	5580		13.19	14.50

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		132	5660		13.03	14.50
		136	5680		13.29	14.50
		140	5700		13.33	14.50
		144	5720		13.49	14.50
	U-NII-3	149	5745		12.37	13.50
		153	5765		12.32	13.50
		157	5785		12.40	13.50
		161	5805		12.33	13.50
		165	5825		12.39	13.50
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11n-HT40	U-NII-1	38	5190	MCS0	13.39	14.00
		46	5230		13.35	14.00
	U-NII-2A	54	5270		13.31	14.00
		62	5310		13.45	14.00
	U-NII-2C	102	5510		13.34	14.00
		110	5550		13.26	14.00
		134	5670		13.27	14.00
		142	5710		13.26	14.00
	U-NII-3	151	5755		12.48	13.00
		159	5795		12.37	13.00
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11ac-20	U-NII-1	36	5180	MCS0	13.14	14.50
		40	5200		13.07	14.50
		44	5220		13.17	14.50
		48	5240		13.14	14.50
	U-NII-2A	52	5260		13.09	14.50
		56	5280		13.14	14.50
		60	5300		13.20	14.50
		64	5320		13.04	14.50
	U-NII-2C	100	5500		13.33	14.50
		104	5520		13.26	14.50
		108	5540		13.16	14.50
		112	5560		13.30	14.50
		116	5580		13.37	14.50
		132	5660		13.23	14.50
		136	5680		13.21	14.50
		140	5700		13.14	14.50
	U-NII-3	144	5720		12.61	14.50
		149	5745		12.43	13.50
		153	5765		12.38	13.50
		157	5785		12.50	13.50

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		161	5805		12.55	13.50
		165	5825		12.41	13.50
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11ac-40	U-NII-1	38	5190	MCS0	12.79	14.00
		46	5230		12.73	14.00
	U-NII-2A	54	5270		12.84	14.00
		62	5310		12.77	14.00
	U-NII-2C	102	5510		12.72	14.00
		110	5550		12.75	14.00
		134	5670		12.62	14.00
		142	5710		12.65	14.00
	U-NII-3	151	5755		12.23	13.00
		159	5795		12.19	13.00
5GHz	mode	Channel	Frequency(MHz)	Data Rate(Mbps)	Average Power (dBm)	Tune up
802.11ac 80M	U-NII-1	42	5210	MCS0	11.76	13.00
	U-NII-2A	58	5290		11.65	13.00
	U-NII-2C	106	5530		12.19	13.00
		138	5690		12.29	13.00
	U-NII-3	155	5775		12.47	13.00

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### 9.1.2 Conducted Power of BT

BT		Average Conducted Power(dBm)			
Band	Channel	0	39	78	Tune up
BT	GFSK	11.69	11.52	11.56	12.50
	$\pi/4$ DQPSK	9.23	9.67	9.87	10.50
	8DPSK	9.34	9.60	9.91	10.50
Band	Channel	0	19	39	Tune up
BLE 1M	GFSK	4.57	4.83	5.01	5.50
Band	Channel	1	19	38	Tune up
BLE 2M	GFSK	4.67	4.89	5.11	5.50

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### 9.2 Measurement of SAR Data

#### Note:

- 1) Graph results refer to Appendix B.
- 2) Per KDB447498 D01, testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:
  - $\leq 0.8\text{W/kg}$  for 1-g or  $2.0\text{W/kg}$  for 10-g respectively, when the transmission band is  $\leq 100\text{MHz}$ .
  - $\leq 0.6\text{ W/kg}$  or  $1.5\text{ W/kg}$ , for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz.
  - $\leq 0.4\text{ W/kg}$  or  $1.0\text{ W/kg}$ , for 1-g or 10-g respectively, when the transmission band is  $\geq 200\text{ MHz}$ .
- 3) Maximum bandwidth does not support at least three non-overlapping channels in certain channel bandwidths. When a device supports overlapping channel assignment in a channel bandwidth configuration, the middle channel of the group of overlapping channels should be selected for testing.

#### WiFi 2.4G:

- 1) When the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2\text{ W/kg}$ , SAR test for the other 802.11 modes are not required.

#### WiFi 5G:

- 1) When the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2\text{ W/kg}$ , SAR test for the other 802.11 modes are not required.

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### 9.2.1 SAR Result of WIFI 2.4G

Wi-Fi 2.4G SAR Test Record											
Test Record											
Test position	Test mode	Test ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	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 (Separate 0mm)											
Back side	802.11b	6/2437	99.64%	1.004	0.116	0.05	16.95	18.50	1.429	0.166	22.2
Left side	802.11b	6/2437	99.64%	1.004	0.001	0.09	16.95	18.50	1.429	0.001	22.2
Right side	802.11b	6/2437	99.64%	1.004	0.001	0.14	16.95	18.50	1.429	0.001	22.2
Top side	802.11b	6/2437	99.64%	1.004	0.479	-0.02	16.95	18.50	1.429	0.687	22.2
Bottom side	802.11b	6/2437	99.64%	1.004	0.001	0.01	16.95	18.50	1.429	0.001	22.2

Table 5: SAR of WIFI 2.4G for Body.

Note:

1) Per KDB 248227 D01, for Body SAR test of WiFi 2.4G, SAR is measured for 2.4 GHz 802.11b DSSS using the initial test position procedure. As the 802.11b highest reported SAR is smaller than 1.2 W/kg, and the tune-up of the other 802.11 modes are not higher than 802.11b, therefore the adjusted SAR is  $\leq 1.2$  W/kg for other 802.11 modes, SAR test for the other 802.11 modes are not required.

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### 9.2.1 SAR Result of WIFI 5G

Wi-Fi 5G SAR Test Record											
Test Record											
Test position	Test mode	Test ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	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.(°C)
Body Test data of U-NII-2A(Separate 0mm)											
Back side	802.11a	64/5320	97.48%	1.026	0.081	0.09	13.50	14.50	1.259	0.105	22.1
Left side	802.11a	64/5320	97.48%	1.026	0.048	-0.13	13.50	14.50	1.259	0.062	22.1
Right side	802.11a	64/5320	97.48%	1.026	0.006	0.06	13.50	14.50	1.259	0.008	22.1
Top side	802.11a	64/5320	97.48%	1.026	0.750	-0.02	13.50	14.50	1.259	0.969	22.1
Top side	802.11a	52/5260	97.48%	1.026	0.682	0.03	13.46	14.50	1.271	0.889	22.1
Top side	802.11a	60/5300	97.48%	1.026	0.677	0.13	13.45	14.50	1.274	0.884	22.1
Bottom side	802.11a	64/5320	97.48%	1.026	0.005	0.01	13.50	14.50	1.259	0.006	22.1
Body Test data of U-NII-2C(Separate 0mm)											
Back side	802.11a	100/5500	97.48%	1.026	0.123	0.03	13.64	14.50	1.219	0.154	22.1
Left side	802.11a	100/5500	97.48%	1.026	0.066	0.14	13.64	14.50	1.219	0.083	22.1
Right side	802.11a	100/5500	97.48%	1.026	0.013	0.05	13.64	14.50	1.219	0.016	22.1
Top side	802.11a	100/5500	97.48%	1.026	0.851	-0.02	13.64	14.50	1.219	1.064	22.1
Top side	802.11a	116/5580	97.48%	1.026	0.816	0.01	13.59	14.50	1.233	1.032	22.1
Top side	802.11a	140/5700	97.48%	1.026	0.794	0.08	13.54	14.50	1.247	1.016	22.1
Bottom side	802.11a	100/5500	97.48%	1.026	0.011	0.07	13.64	14.50	1.219	0.014	22.1
Body Test data of U-NII-3(Separate 0mm)											
Back side	802.11a	165/5825	97.48%	1.026	0.091	0.12	12.44	13.50	1.276	0.119	22.1
Left side	802.11a	165/5825	97.48%	1.026	0.025	-0.04	12.44	13.50	1.276	0.033	22.1
Right side	802.11a	165/5825	97.48%	1.026	0.004	0.03	12.44	13.50	1.276	0.005	22.1
Top side	802.11a	165/5825	97.48%	1.026	0.811	-0.01	12.44	13.50	1.276	1.062	22.1
Top side	802.11a	157/5785	97.48%	1.026	0.735	0.06	12.42	13.50	1.282	0.967	22.1
Top side	802.11a	149/5745	97.48%	1.026	0.747	0.02	12.38	13.50	1.294	0.992	22.1
Bottom side	802.11a	165/5825	97.48%	1.026	0.033	0.04	12.44	13.50	1.276	0.043	22.1

Table 6: SAR of WIFI 5G for Body.

Note:

- 1) When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. As the highest reported SAR for a test configuration is  $\leq 1.2$  W/kg, SAR is not required for U-NII-1 band for that configuration;
- 2) Per KDB248227D01, as the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg, SAR test for the other 802.11 modes are not required.

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### 9.2.1 SAR Result of BT

Bluetooth SAR Test Record											
SAR Test Record											
Test position	Test mode	Test ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	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.(°C)
Body Test data (Separate 0mm)											
Back side	DH5	0/2402	77.20%	1.295	0.003	0.03	11.69	12.50	1.205	0.005	22.2
Left side	DH5	0/2402	77.20%	1.295	0.001	0.11	11.69	12.50	1.205	0.002	22.2
Right side	DH5	0/2402	77.20%	1.295	0.003	0.04	11.69	12.50	1.205	0.005	22.2
Top side	DH5	0/2402	77.20%	1.295	0.065	-0.01	11.69	12.50	1.205	0.102	22.2
Bottom side	DH5	0/2402	77.20%	1.295	0.001	0.06	11.69	12.50	1.205	0.002	22.2

Table 7: SAR of BT for Body.

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### 9.3 Multiple Transmitter Evaluation

#### 9.3.1 Simultaneous SAR SAR test evaluation

- Simultaneous Transmission Possibilities

NO	Simultaneous Tx Combination	Body
1	WLAN 5GHz + BT	Y

**Note:**

- 1) Per FCC KDB Publication 648474 D04 Handset SAR, Phablet SAR tests were not required it wireless router 1g SAR(Scaled to the maximum output power ,including tolerance) < 1.2 W/Kg. Therefore, no further analysis beyond tables included in this section was required to determine that possible Simultaneous transmission scenarios would not exceed the SAR limit.

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### 9.3.2 Simultaneous Transmission SAR Summation Scenario

#### Body:

Test position	WiFi 2.4G	WiFi 5G	Bluetooth	Summed SAR
	1	2	3	2+3
Back side	0.166	0.154	0.005	0.159
Left side	0.001	0.083	0.002	0.085
Right side	0.001	0.016	0.005	0.021
Top side	0.687	1.064	0.102	1.166
Bottom side	0.001	0.043	0.002	0.045

#### Note:

1)  $\text{MAX. } \Sigma \text{SAR}_{10g} = \text{Unlicensed SAR}_{\text{MAX}} + \text{Licensed SAR}_{\text{MAX}}$

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### 10 Equipment list

Test Platform		SPEAG DASY5 Professional				
Description		SAR Test System (Frequency range 4MHz-7.25GHz)				
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
<input checked="" type="checkbox"/>	Twin Phantom	SPEAG	SAM 8	1824	NCR	NCR
<input checked="" type="checkbox"/>	DAE	SPEAG	DAE4	1484	2024-10-15	2025-10-14
<input checked="" type="checkbox"/>	E-Field Probe	SPEAG	EX3DV4	3982	2024-04-29	2025-04-28
<input checked="" type="checkbox"/>	Validation Kits	SPEAG	D2450V2	922	2023-08-28	2026-08-27
<input checked="" type="checkbox"/>	Validation Kits	SPEAG	D5GHzV2	1174	2023-08-23	2026-08-22
<input checked="" type="checkbox"/>	Agilent Network Analyzer	Agilent	E5071C	103535	2024-02-04	2025-02-03
<input checked="" type="checkbox"/>	Universal Radio Communication Tester	R&S	CMW500	111637	2024-09-12	2025-09-11
<input checked="" type="checkbox"/>	DAKS-3.5 probes	SPEAG	DAKS-3.5	1122	NA	NA
<input checked="" type="checkbox"/>	RF Bi-Directional Coupler	Agilent	86205-60001	MY31400031	NCR	NCR
<input checked="" type="checkbox"/>	Signal Generator	R&S	SMB100A	182393	2024-02-05	2025-02-04
<input checked="" type="checkbox"/>	Preamplifier	Qiji	YX28980933	202104001	NCR	NCR
<input checked="" type="checkbox"/>	Power Sensor	Keysight	U2002H	121251	2024-09-12	2025-09-11
<input checked="" type="checkbox"/>	Attenuator	SHX	TS2-3dB	30704	NCR	NCR
<input checked="" type="checkbox"/>	Coaxial low pass filter	Mini-Circuits	VLF-2500(+)	NA	NCR	NCR
<input checked="" type="checkbox"/>	Coaxial low pass filter	Microlab Fxr	LA-F13	NA	NCR	NCR
<input checked="" type="checkbox"/>	DC POWER SUPPLY	SAKO	SK1730SL5A	NA	NCR	NCR
<input checked="" type="checkbox"/>	Speed reading thermometer	LKM	DTM3000	NA	2024-09-13	2025-09-12
<input checked="" type="checkbox"/>	Humidity and Temperature Indicator	Anymetre	Anymetre 1964	NA	2024-02-18	2025-02-17

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

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### 11 Calibration certificate

Please see the Appendix C

### 12 Photographs

Please see the Appendix D

## Appendix A: Detailed System Check Results

## Appendix B: Detailed Test Results

## Appendix C: Calibration certificate

## Appendix D: Photographs

---END---

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