

ELEMENT MATERIALS TECHNOLOGY

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SAR EVALUATION REPORT

Applicant Name:

Apple Inc. One Apple Park Way Cupertino, CA 95014 USA Date of Testing:

08/22/2024 - 08/23/2024

Test Report Issue Date:

08/25/2024

Test Site/Location:

Element, Morgan Hill, CA, USA

Document Serial No.: 1C2404080013-01.BCG

FCC ID: BCG-A3059

APPLICANT: APPLE, INC.

DUT Type: Wireless Earbuds Charging Case

Application Type: Certification
FCC Rule Part(s): CFR §2.1093
Model: A3059

Fauinment			SA	AR
Equipment Class	Band & Mode	Tx Frequency	1g Body-Worn (W/kg)	10g Extremity (W/kg)
DSS/DTS	2.4 GHz Bluetooth	2402 - 2480 MHz	<1.0	<1.0

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

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

RJ Ortanez

Executive Vice President







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

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1 DEVICE UNDER TEST

1.1 Device Overview

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

1.2 Power Reduction for SAR

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

1.3 Nominal and Maximum Output Power Specifications

This device operates using the following maximum and nominal output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D04v01.

1.3.1 Maximum Output Power

Mode / Band	Duty Cycle	Modulated Average (dBm)	
2.4 Plustooth LE	100%	Maximum	5.00
2.4 Bluetooth LE	100%	Nominal	4.00

1.4 DUT Antenna Locations

Based on the expected use conditions and conservative SAR test conditions, Body-worn SAR and Extremity SAR were evaluated. The antenna is located inside BCG-A3059 – which is a wireless earbuds charging case. A diagram showing the location of the device antenna can be found in DUT Antenna Diagram and SAR Test Setup Photographs Appendix. More information about the configurations evaluated for SAR can be found in Section 4.2 and Section 4.3.

1.5 Simultaneous Transmission Capabilities

This Device does not support any Simultaneous transmission Scenarios.

1.6 Guidance Applied

- FCC KDB Publication 447498 D04v01 (General SAR Guidance)
- FCC KDB Publication 865664 D01v01r04, D02v01r02 (SAR Measurements up to 6 GHz)

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1.7 Device Serial Numbers

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

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2 INTRODUCTION

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

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

2.1 SAR Definition

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

Equation 2-1 SAR Mathematical Equation

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

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

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

where:

 σ = conductivity of the tissue-simulating material (S/m) ρ = mass density of the tissue-simulating material (kg/m³)

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

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

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3.1 **Measurement Procedure**

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

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

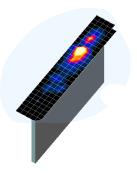


Figure 3-1 Sample SAR Area Scan

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

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

Maximum Area Scan Frequency Resolution (mm)		Maximum Zoom Scan	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan
Frequency	(Δx _{area} , Δy _{area})	Resolution (mm) (Δx _{200m} , Δy _{200m})	Uniform Grid	Gı	raded Grid	Volume (mm) (x,y,z)
	alca yarcay	1 200117	Δz _{zoom} (n)	Δz _{zoom} (1)*	Δz _{zoom} (n>1)*	, ,,, ,
≤ 2 GHz	≤ 15	≤8	≤5	≤4	$\leq 1.5*\Delta z_{zoom}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤5	≤5	≤4	$\leq 1.5*\Delta z_{zoom}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤5	≤4	≤3	$\leq 1.5*\Delta z_{zoom}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤4	≤3	≤2.5	$\leq 1.5*\Delta z_{zoom}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤2	$\leq 1.5*\Delta z_{zoom}(n-1)$	≥ 22

*Also compliant to IEEE 1528-2013 Table 6

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4 TEST CONFIGURATION POSITIONS

4.1 Device Holder

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

4.2 Body-Worn Exposure Conditions

Devices containing one or more wireless transmitters or transceivers with intended use that includes transmitting with any portion of the device being held directly against a user's body. The DUT was evaluated with a separation distance of 0 mm between the front and back sides of the case and the flat phantom. The phantom is filled with head tissue equivalent medium.

4.3 Extremity Exposure Conditions

Devices that designed or intended for use on extremities or mainly operated in extremity only exposure conditions; i.e., hands, wrists, feet and ankles, may require extremity SAR evaluation. Based on the expected use conditions. Extremity SAR was evaluated with the device touching the flat phantom. The phantom is filled with head tissue-equivalent medium.

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5 RF EXPOSURE LIMITS

5.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

5.2 Controlled Environment

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

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

	MAN EXPOSURE LIMITS	en e
	UNCONTROLLED ENVIRONMENT	CONTROLLED ENVIRONMENT
	General Population (W/kg) or (mW/g)	Occupational (W/kg) or (mW/g)
Peak Spatial Average SAR _{Head}	1.6	8.0
Whole Body SAR	0.08	0.4
Peak Spatial Average SAR Hands, Feet, Ankle, Wrists, etc.	4.0	20

- 1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
- 2. The Spatial Average value of the SAR averaged over the whole body.
- 3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

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6 FCC MEASUREMENT PROCEDURES

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D04v01, when SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as *reported* SAR. The highest *reported* SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

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RF CONDUCTED POWERS

Bluetooth Conducted Powers 7.1

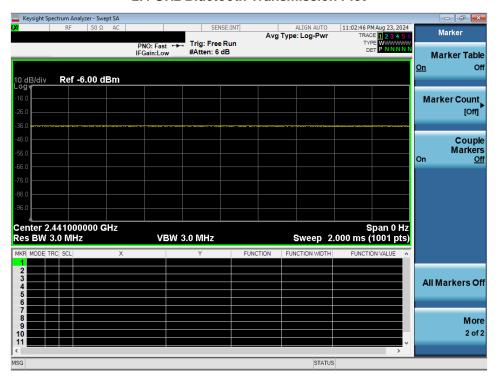
Table 7-1 **Bluetooth Average RF Power**

Frequency [MHz]	Modulation	Data Rate	Channel	Avg Conducted Power			
	Modulation	[Mbps]	No.	[dBm]	[mW]		
2402	LE1M	1.0	0	3.08	2.032		
2441	LE1M	1.0	39	3.04	2.014		
2480	LE1M	1.0	78	3.05	2.018		

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7.2 Bluetooth Duty Cycle Plots

Figure 7-1
2.4 GHz Bluetooth Transmission Plot



Equation 7-1 2.4 GHz Bluetooth Duty Cycle Calculation

Duty Cycle = **100**%

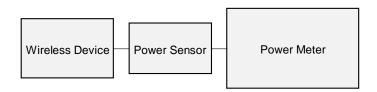


Figure 7-2
Power Measurement Setup

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8.1 Tissue Verification

Table 8-1
Measured Head Tissue Properties

Calibrated for Tests Performed on:	Tissue Type	Tissue Temp During Calibration (°C)	Measured Frequency (MHz)	Measured Conductivity, σ (S/m)	Measured Dielectric Constant, ε	TARGET Conductivity, σ (S/m)	TARGET Dielectric Constant, ε	% dev σ	% dev ε	
			2300	1.593	40.564	1.670	39.500	-4.61%	2.69%	
			2310	1.601	40.550	1.679	39.480	-4.65%	2.71%	
08/22/2024	08/22/2024 2450 Head	19.0	2320	1.608	40.537	1.687	39.460	-4.68%	2.73%	
			2400	1.670	40.443	1.756	39.289	-4.90%	2.94%	
			2450	1.711	40.371	1.800	39.200	-4.94%	2.99%	
			2300	1.621	38.939	1.670	39.500	-2.93%	-1.42%	
			2310	1.633	38.901	1.679	39.480	-2.74%	-1.47%	
			2320	1.644	38.863	1.687	39.460	-2.55%	-1.51%	
			2400	1.731	38.582	1.756	39.289	-1.42%	-1.80%	
				2450	1.788	38.386	1.800	39.200	-0.67%	-2.08%
			2480	1.820	38.278	1.833	39.162	-0.71%	-2.26%	
			2500	1.843	38.199	1.855	39.136	-0.65%	-2.39%	
08/23/2024	2450 Head	24.9	2510	1.854	38.160	1.866	39.123	-0.64%	-2.46%	
			2535	1.883	38.066	1.893	39.092	-0.53%	-2.62%	
			2550	1.901	38.014	1.909	39.073	-0.42%	-2.71%	
			2560	1.912	37.981	1.920	39.060	-0.42%	-2.76%	
			2600	1.957	37.835	1.964	39.009	-0.36%	-3.01%	
			2650	2.016	37.631	2.018	38.945	-0.10%	-3.37%	
			2680	2.050	37.521	2.051	38.907	-0.05%	-3.56%	
			2700	2.072	37.437	2.073	38.882	-0.05%	-3.72%	

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

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

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8.2 Test System Verification

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

Table 8-2 System Verification Results

	System Verification TARGET & MEASURED																
SAR System Frequency (MHz) Tissue Tissue (MHz) Type Date Type Date Temp. (C) Date SN DAE									Deviation 10g (%)								
AM10	2450	HEAD	08/22/2024	20.4	20.5	0.10	750	7546	1402	5.170	52.600	51.700	-1.71%	2.440	24.500	24.400	-0.41%
AM7	2450	HEAD	08/23/2024	20.5	23.1	0.10	750	7421	604	5.120	52.600	51.200	-2.66%	2.290	24.500	22.900	-6.53%

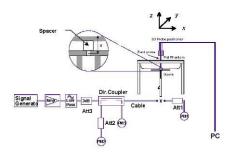


Figure 8-1
System Verification Setup Diagram



Figure 8-2
System Verification Setup Photo

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9 SAR DATA SUMMARY

9.1 2.4 GHz Bluetooth SISO Standalone Body-Worn SAR

Table 9-1

Exposure	Band / Mode	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #		Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 1g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 1g SAR [W/kg]	Plot#	
Body	2.4 GHz Bluetooth	C30N19QKY4	100.00	-0.03	2402	0	1	5.00	3.08	Back	0	0.034	1.556	1.000	0.053		
Body	2.4 GHz Bluetooth	C30N19QKY4	100.00	-0.13	2402	0	1	5.00	3.08	Front	0	0.044	1.556	1.000	0.068		
Body	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.03	2441	39	1	5.00	3.04	Front	0	0.052	1.570	1.000	0.082	A1	
Body	Body 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2480 78 1 5.00 3.05										0	0.045	1.567	1.000	0.071		
	ANSI/IEEE C95.1 1992 - SAFETY LIMIT										Body						
	Spatial Peak Uncontrolled Exposure/General Population											1.6 W/kg (mW/g) averaged over 1 gram					

9.2 2.4 GHz Bluetooth SISO Standalone Extremity SAR

Table 9-2

Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 -0.03 2402 0 1 5.00 3.08 Back 0 0.014 1.556 1.000 0.022	Exposure	Band / Mode	Serial Number	Duty Cycle [%]	Power Drift [dB]	Frequency [MHz]	Channel #		Max Allowed Power [dBm]	Conducted Power [dBm]	Test Position	Spacing [mm]	Measured 10g SAR [W/kg]	Power Scaling Factor	Duty Cycle Scaling Factor	Reported 10g SAR [W/kg]	Plot#
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2441 39 1 5.00 3.04 Front 0 0.024 1.570 1.000 0.038 A2 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2480 78 1 5.00 3.05 Front 0 0.020 1.567 1.000 0.031 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.05 2402 0 1 5.00 3.08 Top 0 0.003 1.556 1.000 0.005 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2402 0 1 5.00 3.08 Bottom 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 Extremity 8.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 0.000 Extremity 8.4 GHz Bluetooth C30N19QKY4 100.00 0.000 0	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	-0.03	2402	0	1	5.00	3.08	Back	0	0.014	1.556	1.000	0.022	
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2480 78 1 5.00 3.05 Front 0 0.020 1.567 1.000 0.031 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.05 2402 0 1 5.00 3.08 Top 0 0.003 1.556 1.000 0.005 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2402 0 1 5.00 3.08 Bottom 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2402 0 1 5.00 3.08 Bottom 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 Extremity 4.0 W/g (mW/g)	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	-0.13	2402	0	1	5.00	3.08	Front	0	0.020	1.556	1.000	0.031	
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.05 2402 0 1 5.00 3.08 Top 0 0.003 1.556 1.000 0.005 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2402 0 1 5.00 3.08 Bottom 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.009 Extremity Spatial Peak	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.03	2441	39	1	5.00	3.04	Front	0	0.024	1.570	1.000	0.038	A2
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.18 2402 0 1 5.00 3.08 Bottom 0 0.000 1.556 1.000 0.000 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.009 Extremity Spatial Peak Spatial Peak 4.0 W/kg (mw/g)	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.18	2480	78	1	5.00	3.05	Front	0	0.020	1.567	1.000	0.031	
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.01 2402 0 1 5.00 3.08 Right 0 0.006 1.556 1.000 0.009 Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 SET 1.500 1.500 1.556 1.000 0.000 1.000 1.000 0.000 1.000 0.0	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.05	2402	0	1	5.00	3.08	Тор	0	0.003	1.556	1.000	0.005	
Extremity 2.4 GHz Bluetooth C30N19QKY4 100.00 0.03 2402 0 1 5.00 3.08 Left 0 0.000 1.556 1.000 0.000 ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Extremity 4.0 W/kg (mW/g)	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.18	2402	0	1	5.00	3.08	Bottom	0	0.000	1.556	1.000	0.000	
ANSI/IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak 4.0 W/kg (mW/g)	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.01	2402	0	1	5.00	3.08	Right	0	0.006	1.556	1.000	0.009	
Spatial Peak 4.0 W/kg (mW/g)	Extremity	2.4 GHz Bluetooth	C30N19QKY4	100.00	0.03	2402	0	1	5.00	3.08	Left	0	0.000	1.556	1.000	0.000	
, , , , , ,		ANSI/IEEE C95.1 1992 - SAFETY LIMIT											Ex	tremity			
Uncontrolled Exposure/General Population averaged over 10 grams				Spati	ial Peak								4.0 W/	kg (mW/g)			
			Uncont	rolled Exposu	re/General	Population							averaged	over 10 gra	ms		

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9.3 **SAR Test Notes**

General Notes:

- 1. Batteries are fully charged at the beginning of the SAR measurements.
- 2. Liquid tissue depth was at least 15.0 cm for all frequencies.
- The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics and are within operational tolerances expected for production units.
- 4. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D04v01.
- To demonstrate compliance for Head, SAR testing was performed on a flat phantom filled with head tissue equivalent medium.
- Per manufacturer request, Body-Worn SAR was additionally evaluated as a conservative SAR test condition for the wireless earbuds charging case (BCG-A3059).
- 7. Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg and 2.0 W/kg for 10g SAR.
- 8. Unless otherwise noted, when 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds below.
- 9. The orange highlights throughout the report represents the highest scaled SAR per Equipment Class.

Bluetooth Notes

1. Bluetooth SAR was evaluated with a test mode with hopping disabled with DH5 operation. The reported SAR was scaled to the 100% transmission duty factor to determine compliance for a more conservative exposure analysis. See section 7.2 for the time domain plot and calculation for the duty factor of the device.

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10 SAR MEASUREMENT VARIABILITY

10.1 Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, variability SAR tests were not required since measured SAR results for all frequency bands were less than 0.8 W/kg and 2.0 W/kg for 10g SAR.

10.2 Measurement Uncertainty

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

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	ls Charging Case

11 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	E4404B	Spectrum Analyzer	N/A	N/A	N/A	MY45113242
Agilent	E4438C	ESG Vector Signal Generator	11/14/2023	Annual	11/14/2024	MY45093852
Agilent	E4438C	ESG Vector Signal Generator	11/15/2023	Annual	11/15/2024	MY45092078
Agilent	N5182A	MXG Vector Signal Generator	10/12/2023	Annual	10/12/2024	MY47400015
Agilent	N5182A	MXG Vector Signal Generator	3/7/2024	Annual	3/7/2025	MY47420603
Agilent	8753ES	S-Parameter Vector Network Analyzer	1/10/2024	Annual	1/10/2025	MY40001472
Agilent	E5515C	Wireless Communications Test Set	CBT	N/A	CBT	GB46310798
Agilent	E5515C	Wireless Communications Test Set	CBT	N/A	CBT	US41140256
Agilent	N4010A	Wireless Connectivity Test Set	N/A	N/A	N/A	GB46170464
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433973
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433974
Amplifier Research	150A100C	Amplifier	CBT	N/A	CBT	350132
Anritsu	MN8110B	I/O Adaptor	CBT	N/A	CBT	6261747881
Anritsu	ML2496A	Power Meter	6/24/2024	Annual	6/24/2025	1840005
Anritsu	ML2495A	Power Meter	7/8/2024	Annual	7/8/2025	1039008
Anritsu	MA2411B	Pulse Power Sensor	8/22/2023	Annual	8/22/2024	1726262
Anritsu	MA2411B	Pulse Power Sensor	11/8/2023	Annual	11/8/2024	1027293
Anritsu	MA24106A	USB Power Sensor	12/4/2023	Annual	12/4/2024	1520501
Anritsu	MA24106A	USB Power Sensor	4/15/2024	Annual	4/15/2025	1827528
Mini-Circuits	PWR-4GHS	USB Power Sensor	6/12/2024	Annual	6/12/2025	12001070013
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240174346
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171096
Control Company	4052	Long Stem Thermometer	2/27/2024	Biennial	2/27/2026	240171059
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310280
Control Company	4040	Therm./ Clock/ Humidity Monitor	4/15/2024	Biennial	4/15/2026	240310282
Control Company	S66279	Therm./ Clock/ Humidity Monitor	2/16/2024	Biennial	2/16/2026	240140051
Mitutoyo	500-196-30	CD-6"ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Keysight Technologies	N9020A	MXA Signal Analyzer	4/11/2024	Annual	4/11/2025	MY54500644
Agilent	N9020A	MXA Signal Analyzer	6/14/2024	Annual	6/14/2025	MY56470202
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini-Circuits	VLF-6000+	Low Pass Filter DC to 6000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-1200+	Low Pass Filter DC to 1000 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	NLP-2950+	Low Pass Filter DC to 2700 MHz	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Mini-Circuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Narda	4772-3	Attenuator (3dB)	CBT	N/A	CBT	9406
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
Seekonk	NC-100	Torque Wrench	CBT	N/A	CBT	22217
Seekonk	NC-100	Torque Wrench	4/2/2024	Biennial	4/2/2026	1262
SPEAG	DAK-3.5	Dielectric Assessment Kit	11/13/2023	Annual	11/13/2024	1277
SPEAG	DAKS-3.5	Portable Dielectric Assessment Kit	7/8/2024	Annual	7/8/2025	1039
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1237
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1331
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1390
SPEAG	D2450V2	2450 MHz SAR Dipole	5/11/2022	Triennial	5/11/2025	750
SPEAG	DAE4	Dasy Data Acquisition Electronics	4/10/2024	Annual	4/10/2025	1402
SPEAG	DAE4	Dasy Data Acquisition Electronics	3/6/2024	Annual	3/6/2025	604
SPEAG	EX3DV4	SAR Probe	3/11/2024	Annual	3/11/2025	7421
SPEAG	EX3DV4	SAR Probe	4/16/2024	Annual	4/16/2025	7546
SPEAG	A IIi	SAR Probe	4/16/2024		4/16/2025	/540

All equipment was used solely within its respective calibration period.

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

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MEASUREMENT UNCERTAINTIES

а	b	С	d	e=	f	g	h =	i =	k
				f(d,k)			c x f/e	c x q/e	
	IEEE	Tol.	Prob.	.(۵,)	C _i	C _i	1gm	10gms	
Uncertainty Component	1528			Div					
Chook taking Companions	Sec.	(± %)	Dist.	Div.	1gm	10 gms	u _i (± %)	u _i (± %)	V _i
Measurement System							(± /0)	(± /6)	
Probe Calibration	E.2.1	7	N	1	1	1	7.0	7.0	∞
Axial Isotropy	E.2.2	0.25	N	1	0.7	0.7	0.2	0.2	∞
Hemishperical Isotropy	E.2.2	1.3	N	1	0.7	0.7	0.9	0.9	∞
Boundary Effect	E.2.3	2	R	1.732	1	1	1.2	1.2	∞
Linearity	E.2.4	0.3	N	1	1	1	0.3	0.3	∞
System Detection Limits	E.2.4	0.25	R	1.732	1	1	0.1	0.1	∞
Modulation Response	E.2.5	4.8	R	1.732	1	1	2.8	2.8	∞
Readout Electronics	E.2.6	0.3	N	1	1	1	0.3	0.3	∞
Response Time	E.2.7	0.8	R	1.732	1	1	0.5	0.5	∞
Integration Time	E.2.8	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
RF Ambient Conditions - Reflections	E.6.1	3	R	1.732	1	1	1.7	1.7	∞
Probe Positioner Mechanical Tolerance	E.6.2	0.8	R	1.732	1	1	0.5	0.5	∞
Probe Positioning w/ respect to Phantom	E.6.3	6.7	R	1.732	1	1	3.9	3.9	∞
Extrapolation, Interpolation & Integration algorithms for Max. SAR Evaluation	E5	4	R	1.732	1	1	2.3	2.3	∞
Test Sample Related									
Test Sample Positioning	E.4.2	3.12	N	1	1	1	3.1	3.1	35
Device Holder Uncertainty	E.4.1	1.67	N	1	1	1	1.7	1.7	5
Output Power Variation - SAR drift measurement	E.2.9	5	R	1.732	1	1	2.9	2.9	∞
SAR Scaling	E.6.5	0	R	1.732	1	1	0.0	0.0	∞
Phantom & Tissue Parameters									
Phantom Uncertainty (Shape & Thickness tolerances)	E3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	8
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E3.3	4.2	N	1	0.23	0.26	1.0	1.1	75
Liquid Conductivity - Temperature Uncertainty	E.3.4	3.4	R	1.732	0.78	0.71	1.5	1.4	∞
Liquid Permittivity - Temperature Unceritainty	E.3.4	0.6	R	1.732	0.23	0.26	0.1	0.1	∞
Liquid Conductivity - deviation from target values	E.3.2	5.0	R	1.73	0.64	0.43	1.8	1.2	∞
Liquid Permittivity - deviation from target values	E.3.2	5.0	R	1.73	0.60	0.49	1.7	1.4	∞
Combined Standard Uncertainty (k=1)					I.	12.2	12.0	191	
Expanded Uncertainty k=2					24.4	24.0			
(95% CONFIDENCE LEVEL)									

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

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13 CONCLUSION

13.1 Measurement Conclusion

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

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

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