



SAR EVALUATION REPORT

**FCC 47 CFR § 2.1093
IEEE Std 1528-2013**

For
Wireless Smart Scale

**FCC ID: XRAFB202
Model Name: FB202**

**Report Number: 11641559-S1V2
Issue Date: 7/19/2017**

Prepared for
Fitbit
**199 Fremont Street, 14th Floor
San Francisco, CA 94105**

Prepared by
UL VERIFICATION SERVICES INC.
47173 BENICIA STREET
FREMONT, CA 94538, U.S.A.
TEL: (510) 771-1000
FAX: (510) 661-0888



NVLAP LAB CODE 200065-0

Revision History

Rev.	Date	Revisions	Revised By
V1	7/18/2017	Initial Issue	--
V2	7/19/2017	Section 4.3 – Updated test equipment list	Dave Weaver

Table of Contents

1.	Attestation of Test Results	4
2.	Test Specification, Methods and Procedures.....	5
3.	Facilities and Accreditation.....	5
4.	SAR Measurement System & Test Equipment	6
4.1.	<i>SAR Measurement System.....</i>	6
4.2.	<i>SAR Scan Procedures.....</i>	7
4.3.	<i>Test Equipment.....</i>	9
5.	Measurement Uncertainty.....	9
6.	Device Under Test (DUT) Information	10
6.1.	<i>DUT Description</i>	10
6.2.	<i>Wireless Technologies.....</i>	10
6.3.	<i>Maximum Output Power</i>	10
7.	RF Exposure Conditions (Test Configurations).....	10
8.	Dielectric Property Measurements & System Check	11
8.1.	<i>Dielectric Property Measurements</i>	11
8.2.	<i>System Check.....</i>	12
9.	Conducted Output Power Measurements.....	13
9.1.	<i>Wi-Fi 2.4GHz (DTS Band)</i>	13
10.	Measured and Reported (Scaled) SAR Results.....	14
10.1.	<i>Wi-Fi (DTS Band).....</i>	15
10.2.	<i>Standalone SAR Test Exclusion Considerations</i>	15
11.	SAR Measurement Variability.....	16
12.	Simultaneous Transmission SAR Analysis.....	16
Appendixes		17
	<i>11641559-S1V1 SAR_App A Setup Photos</i>	17
	<i>11641559-S1V1 SAR_App B System Check Plots.....</i>	17
	<i>11641559-S1V1 SAR_App C Highest Test Plots.....</i>	17
	<i>11641559-S1V1 SAR_App D Tissue Ingredients.....</i>	17
	<i>11641559-S1V1 SAR_App E Probe Cal. Certificates</i>	17
	<i>11641559-S1V1 SAR_App F Dipole Cal. Certificates.....</i>	17

1. Attestation of Test Results

Applicant Name	Fitbit	
FCC ID	XRAFB202	
Model Name	FB202	
Applicable Standards	FCC 47 CFR § 2.1093 Published RF exposure KDB procedures IEEE Std 1528-2013	
Exposure Category	SAR Limits (W/Kg)	
	Peak spatial-average(1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)
General population / Uncontrolled exposure	1.6	4
RF Exposure Conditions	Equipment Class - Highest Reported SAR (W/kg)	
	DTS	
Extremity	1.151	
Date Tested	6/30/2017 to 7/17/2017	
Test Results	Pass	

UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by UL Verification Services Inc. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government (NIST Handbook 150, Annex A). This report is written to support regulatory compliance of the applicable standards stated above.

Approved & Released By: 	Prepared By: 
David Weaver Program Manager UL Verification Services Inc.	Tony Soares Laboratory Technician UL Verification Services Inc.

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, the following FCC Published RF exposure [KDB](#) procedures:

- 248227 D01 802.11 Wi-Fi SAR v02r02
- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

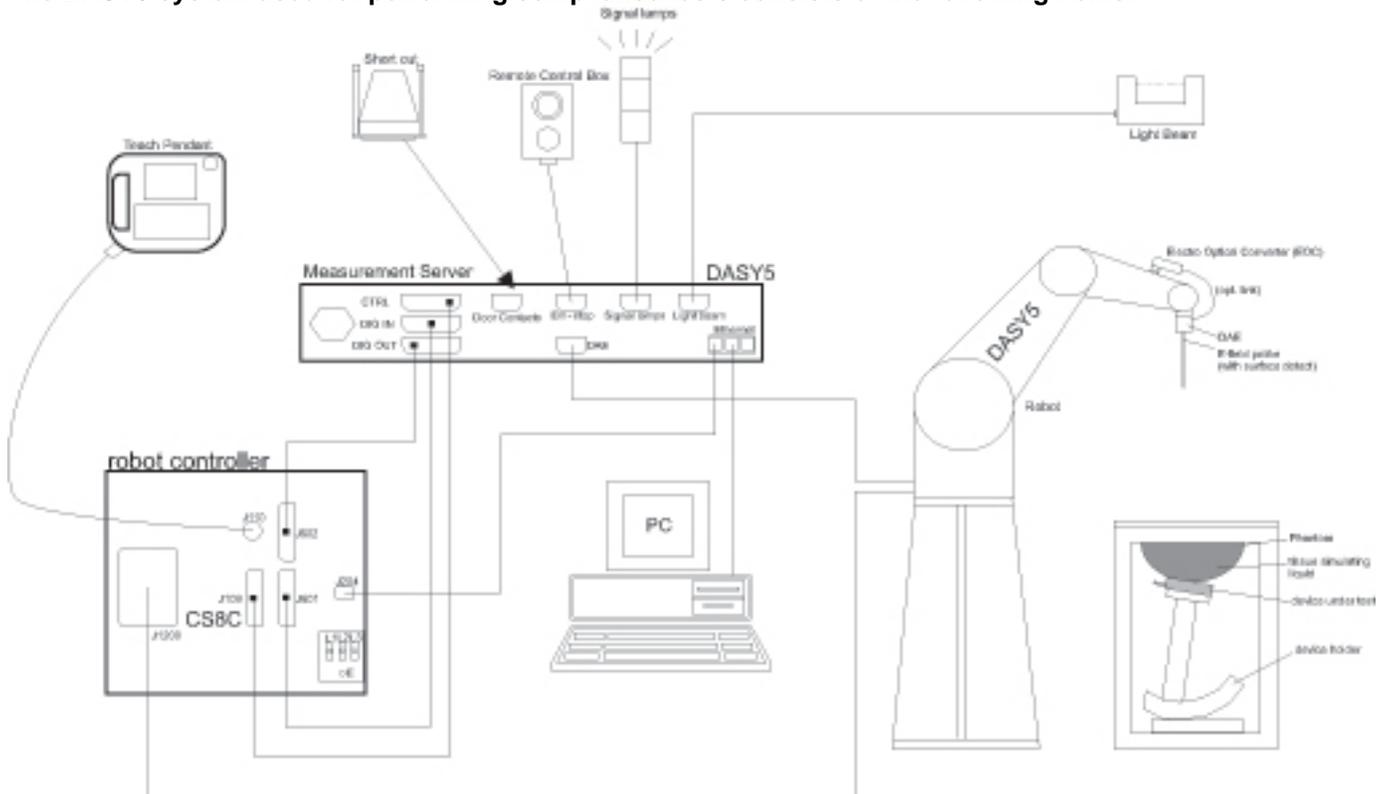
47173 Benicia Street	47266 Benicia Street
SAR Lab A	SAR Lab 1
SAR Lab B	SAR Lab 2
SAR Lab C	SAR Lab 3
SAR Lab D	SAR Lab 4
SAR Lab E	
SAR Lab F	
SAR Lab G	
SAR Lab H	

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

The DASY5 system used for performing compliance tests consists of the following items:



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running WinXP or Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

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

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

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

		≤ 3 GHz	> 3 GHz	
Maximum zoom scan spatial resolution: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{Zoom}(n)$	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	$\Delta z_{Zoom}(1)$: between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		$\Delta z_{Zoom}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$	
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

Step 5: Z-Scan (FCC only)

The Z Scan measures points along a vertical straight line. The line runs along the Z-axis of a one-dimensional grid. In order to get a reasonable extrapolation the extrapolated distance should not be larger than the step size in Z-direction.

4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
S-Parameter Network Analyzer	Agilent	8753ES	MY40000980	5/10/2018
Dielectric Probe kit	SPEAG	DAK-3.5	2052	2/16/2018
Shorting block	SPEAG	DAK-3.5 Short	SM DAK 200 BA	11/8/2017
Thermometer	Control Company	Traceable 4242	122529162	11/11/2017

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthesized Signal Generator	Agilent	N5181A	MY50140610	5/31/2018
Power Meter	HP	437B	3125U11364	8/30/2017
Power Meter	HP	437B	3125U09248	9/14/2017
Power Sensor	Agilent	8481A	3318A95392	9/29/2017
Power Sensor	Agilent	8481A	2349A36506	9/29/2017
Amplifier	MITEQ	AMF-4D-00400600-50-30P	1795093	N/A
Bi-directional coupler	Werlatone, Inc.	C8060-102	2710	N/A
DC Power Supply	HP	6296A	2841A-05955	N/A

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab 2)	SPEAG	EX3DV4	3991	5/30/2018
E-Field Probe (SAR Lab 3)	SPEAG	EX3DV4	3871	8/25/2017
Data Acquisition Electronics (SAR Lab 2)	SPEAG	DAE4	1433	3/8/2018
Data Acquisition Electronics (SAR Lab 3)	SPEAG	DAE4	1343	8/15/2017
System Validation Dipole	SPEAG	D2450V2	899	3/10/2018
Thermometer (SAR Lab 2)	Traceable	15557603	160643193	7/25/2017
Thermometer (SAR Lab 3)	Traceable	15557603	160643167	7/25/2017

Other

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Power Meter	Agilent	N1912A	MY55196007	7/8/2017*
Power Sensor	Agilent	N1921A	MY52260009	1/5/2018

*Equipment was used prior to the Cal. Due Date

5. Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

6. Device Under Test (DUT) Information

6.1. DUT Description

Device Dimension	Overall (Length x Width): 313 mm x 313 mm Overall Diagonal: 445 mm Display Diameter: 56 mm		
Back Cover	<input checked="" type="checkbox"/> Normal Battery Cover		
Battery Options	<input checked="" type="checkbox"/> Exchangeable AA batteries		
Test sample information	S/N 1704262408316A4617	Notes SAR Unit	
Hardware Version	DVT2.1		
Software Version	10.2		

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing
Wi-Fi	2.4 GHz	802.11b 802.11g 802.11n (HT20)	100%
BLE	2.4 GHz	BLE (Chain 0 only)	NA

6.3. Maximum Output Power

RF Air interface	Mode	Max. RF Output Power (dBm)	
		Chain 0	Chain 1
WiFi 2.4 GHz	802.11b	19.5	19.5
	802.11g	19.5	19.5
	802.11n HT20	19.5	19.5
BLE		7.5	NA

7. RF Exposure Conditions (Test Configurations)

Refer to Appendix A for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

Wireless technologies	RF Exposure Conditions	DUT-to-User Separation	Test Position	SAR Required
WLAN (Chain 0)	Extremity	0 mm	Top	Yes
WLAN (Chain 1)				Yes
BLE (Chain 0)	Extremity	0 mm	Top	No

The normal use condition is with the user standing on the DUT. Therefore only the top surface was assessed. BLE is excluded from SAR testing (see Section 10.2).

8. Dielectric Property Measurements & System Check

8.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within ± 2°C of the temperature when the tissue parameters are characterized.

The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

The dielectric constant (ϵ_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within ± 5% of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ϵ_r and σ may be relaxed to ± 10%. This is limited to frequencies ≤ 3 GHz.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

SAR Lab	Date	Band (MHz)	Tissue Type	Frequency (MHz)	Relative Permittivity (ϵ_r)			Conductivity (σ)		
					Measured	Target	Delta (%)	Measured	Target	Delta (%)
3	6/30/2017	2450	Body	2450	50.92	52.70	-3.38	2.01	1.95	3.03
				2400	51.06	52.77	-3.25	1.96	1.90	3.16
				2480	50.85	52.66	-3.44	2.05	1.99	2.70
2	7/17/2017	2450	Body	2450	50.22	52.70	-4.71	1.95	1.95	-0.26
				2400	50.28	52.77	-4.72	1.87	1.90	-1.27
				2480	50.11	52.66	-4.85	1.96	1.99	-1.61

8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

System Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within 10% of the manufacturer calibrated dipole SAR target.

SAR Lab	Date	Tissue Type	Dipole Type _Serial #	Dipole Cal. Due Date	Measured Results for 1g SAR				Measured Results for 10g SAR				Plot No.
					Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	
3	6/30/2017	Body	D2450V2 SN:899	3/10/2018	5.300	53.00	50.30	5.37	2.440	24.40	23.70	2.95	1,2
2	7/17/2017	Body	D2450V2 SN:899	3/10/2018	5.030	50.30	50.30	0.00	2.310	23.10	23.70	-2.53	3,4

9. Conducted Output Power Measurements

9.1. Wi-Fi 2.4GHz (DTS Band)

Measured Results

Band (GHz)	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)		Max Output Power (dBm)		SAR Test (Yes/No)
					Chain 0	Chain 1	Chain 0	Chain 1	
2.4	802.11b	1 Mbps	1	2412	18.3	18.2	19.5	19.5	Yes
			6	2437	18.2	18.3			
			11	2462	18.4	18.5			
	802.11g	6 Mbps	1	2412	Not Required	Not Required	19.5	19.5	No
			6	2437					
			11	2462					
	802.11n (HT20)	6.5 Mbps	1	2412	Not Required	Not Required	19.5	19.5	No
			6	2437					
			11	2462					

Note(s):

- For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) when the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band. Additional output power measurements were not deemed necessary

10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

KDB 447498 D01 General RF Exposure Guidance:

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:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

KDB 248227 D01 SAR meas for 802.11:

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

- ≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- > 0.4 W/kg, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is ≤ 0.8 W/kg or all required test positions are tested.
 - For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
 - When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is > 0.8 W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is ≤ 1.2 W/kg or all required test channels are considered.
 - The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is ≤ 1.2 W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is ≤ 1.2 W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

To determine the initial test position, Area Scans were performed to determine the position with the *Maximum Value of SAR (measured)*. The position that produced the highest *Maximum Value of SAR* is considered the worst case position; thus used as the initial test position.

10.1. Wi-Fi (DTS Band)

Frequency Band	Antenna	Mode	Dist. (mm)	Test Position	Ch #.	Freq. (MHz)	Power (dBm)		10-g SAR (W/kg)		Plot No.
							Tune-up limit	Meas.	Meas.	Scaled	
2.4GHz	SISO (Chain 0)	802.11b 1 Mbps	0	Top	1	2412.0	19.5	18.3	0.853	1.124	1
					6	2437.0	19.5	18.2	0.767	1.035	
					11	2462.0	19.5	18.4	0.777	1.001	
	SISO (Chain 1)	802.11b 1 Mbps	0	Top	1	2412.0	19.5	18.2	0.807	1.089	
					6	2437.0	19.5	18.3	0.873	1.151	2
					11	2462.0	19.5	18.5	0.839	1.056	

10.2. Standalone SAR Test Exclusion Considerations

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$, for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- $f_{(\text{GHz})}$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

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

When the standalone SAR test exclusion is applied to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

- $(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm}) \cdot [\sqrt{f_{(\text{GHz})}}/x] \text{ W/kg}$ for test separation distances ≤ 50 mm; where $x = 7.5$ for 1-g SAR, and $x = 18.75$ for 10-g SAR.
- 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

RF Air interface	RF Exposure Conditions	Frequency (GHz)	Max. tune-up tolerance Power		Min. test separation distance (mm)	SAR test exclusion Result*
			(dBm)	(mW)		
BLE	Extremity	2.480	7.5	6	11	0.9

Conclusion:

*: The computed value is ≤ 7.5; therefore, this qualifies for Standalone SAR test exclusion.

11. SAR Measurement Variability

In accordance with published RF Exposure KDB 865664 D01 SAR measurement 100 MHz to 6 GHz. These 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 <0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
- 4) Perform a third repeated measurement only if the original, first, or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

Frequency Band (GHz)	Air Interface	RF Exposure Conditions	Test Position	Repeated SAR (Yes/No)	Highest Measured SAR (W/kg)	First Repeated		Second Repeated		Third Repeated
						Measured SAR (W/kg)	Largest to Smallest SAR Ratio	Measured SAR (W/kg)	Largest to Smallest SAR Ratio	Measured SAR (W/kg)
2.4	Wi-Fi 802.11b/g/n	Extremity	Top	No	0.873	N/A	N/A	N/A	N/A	N/A

12. Simultaneous Transmission SAR Analysis

Simultaneous SAR is not supported for this device.

Appendixes

Refer to separated files for the following appendixes.

11641559-S1V2 SAR_App A Setup Photos

11641559-S1V2 SAR_App B System Check Plots

11641559-S1V2 SAR_App C Highest Test Plots

11641559-S1V2 SAR_App D Tissue Ingredients

11641559-S1V2 SAR_App E Probe Cal. Certificates

11641559-S1V2 SAR_App F Dipole Cal. Certificates

END OF REPORT