



6 GHZ RF EXPOSURE EVALUATION

Applicant Name

SAMSUNG ELECTRONICS CO., LTD.
#129 Samsung-Ro, Yeongtong-Gu
Suwon-Si, Gyeonggi-Do
16677, Korea (Republic Of)

Date of Testing

05/30/2023

Test Site/Location

Element, Columbia, MD, USA

Document Serial No:

1M2305260069-03.A3L

FCC ID:

A3LSMF731U

APPLICANT:

SAMSUNG ELECTRONICS CO., LTD.

DUT Type:

Portable Handset

Application Type:

Class II Permissive Change

FCC Rule Part(s):

CFR §2.1093

Model:

SM-F731U

Additional Model(s):

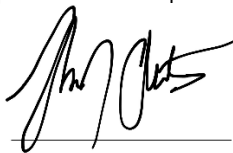
SM-F731U1

Band & Mode	Tx Frequency	SAR	APD
	MHz	1g Head (W/kg)	Head (W/m ²)
WIFI 6 GHz	5935 - 7115	0.11	0.72

Values above represent RF exposure evaluations during MIMO operations.

Only operations relevant to this permissive change were evaluated for compliance. Please see the original compliance evaluation in RF Exposure Technical Report S/N 1M2303100026-26.A3L for complete evaluation of all other operating modes. The operational description includes a description of all changed items.

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



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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Tx Frequency
U-NII-5	5935 - 6415 MHz
U-NII-6	6435 - 6515 MHz
U-NII-7	6535 - 6875 MHz
U-NII-8	6895 - 7115 MHz

1.2 Nominal and Maximum Output Power Specifications

The 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 D01v06.

1.2.1 Reduced MIMO WLAN Output Power

Mode	IEEE 802.11 (in dBm)			
	MIMO			
	a (CDD + STBC)		ax (SU) (CDD + STBC, SDM)	
	Nominal	Maximum	Nominal	Maximum
6 GHz WIFI (20MHz)	12.0	13.0	12.0	13.0
6 GHz WIFI (40MHz)			12.0	13.0
6 GHz WIFI (80MHz)			12.0	13.0
6 GHz WIFI (160MHz)			12.0	13.0

Note: Target powers in the above table represent worst case targets across LPI and SP options.

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IEEE 802.11ax RU (in dBm)								
Mode	MIMO							
Tones	6G 20MHz		6G 40MHz		6G 80MHz		6G 160MHz	
	Nominal	Maximum	Nominal	Maximum	Nominal	Maximum	Nominal	Maximum
26T	12.0	13.0	12.0	13.0	12.0	13.0	12.0	13.0
52T	12.0	13.0	12.0	13.0	12.0	13.0	12.0	13.0
106T	12.0	13.0	12.0	13.0	12.0	13.0	12.0	13.0
242T	12.0	13.0	12.0	13.0	12.0	13.0	12.0	13.0
484T			12.0	13.0	12.0	13.0	12.0	13.0
996T					12.0	13.0	12.0	13.0
2x996T							12.0	13.0

Note: Target powers in the above table represent worst case targets across LPI and SP options.

1.3 DUT Antenna Locations

A diagram showing the location of the device antennas for open configurations can be found in DUT Antenna Diagram and SAR Test Setup Photographs Appendix

**Table 1-1
Device Surfaces for Configuration**

Device Sides/Edges for Testing							
Mode	Form Factor	Back	Front	Top	Bottom	Right	Left
6 GHz WLAN MIMO	Open	Yes	Yes	Yes	No	Yes	Yes
6 GHz WLAN MIMO	Closed	Yes	No	No	No	No	No

Note: Particular DUT edges were not required to be evaluated for phablet SAR if the edges were greater than 2.5 cm from the transmitting antenna according to FCC KDB Publication 648474 D04v01r03. The distances between the transmit antennas and the edges of the device are included in the filing. Wireless router mode is disabled for all 6 GHz WLAN operations.

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1.4 Miscellaneous Testing Considerations

Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors for WIFI 6GHz. FCC KDB 648474, FCC KDB 941225 D07 and FCC KDB 248227 were followed for test positions, distances, and modes. Absorbed power density (APD) using a 4cm² averaging area is reported based on SAR measurements. Incident power density is evaluated at 2mm ensuring that the resolution is sufficient such that integrated power density (iPD) between d=2mm and d= λ /5mm is ≥ -1 dB per equipment manufacturer guidance. Power density results are scaled up for uncertainty above 30%. Per TCB workshop October 2020 notes, 5 channels were tested for WIFI 6 GHz.

6 GHz WIFI SAR results are used for simultaneous transmission analysis with the other transmitters. Analysis can be found in SAR report.

To make the most efficient use of the additional available subcarriers (data tones), IEEE 802.11ax can utilize Orthogonal Frequency-Division Multiple Access (OFDMA) which divides the existing 802.11 channels into smaller subchannels called Resource Units (RUs). Possible RU sizes are: 26T, 52T, 106T, 242T, 484T, 996T and 2x996T.

Per FCC Guidance, 802.11ax RU was considered a higher order 802.11 mode when compared to a/b/g/n/ac to apply KDB Publication 248227 D01v02r02 for OFDM mode selection. Therefore, SAR tests were not required for 802.11ax RU based on the maximum allowed output powers of OFDM modes and the reported SAR values. Per FCC Guidance, maximum conducted powers were performed for each RU size to demonstrate that the output powers would not be higher than the other OFDM 802.11 modes. Please see Measurement Report SN 1M2303100026-18.A3L for 802.11ax RU output powers.

1.5 Guidance Applied

- November 2017, October 2018, April 2019, November 2019, October 2020 TCBC Workshop Notes
- SPEAG DASY6 System Handbook
- SPEAG DASY6 Application Note (Interim Procedures for Devices Operating at 6-10 GHz) (Nov 2021)
- IEEE 1528-2013
- IEC/IEEE 63195-1:2022
- IEC 62479:2010
- FCC KDB 865664 D02 v01r02
- FCC KDB 648474 D04 v01r03
- FCC KDB 248227 D01 v02r02
- FCC KDB 447498 D04 v01
- FCC KDB 865664 D01 v01r04
- April 2019 TCB Workshop Notes (IEEE 802.11ax)

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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. [15]

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 [44] and Health Canada RF Exposure Guidelines Safety Code 6 [35]. The measurement procedure described in IEEE/ANSI C95.3-2002 Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave [17] 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/m ³)
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.[20]

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3 DOSIMETRIC ASSESSMENT

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 3-1) 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.
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 3-1) 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 DASY 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 3-1. The extrapolation was based on a least-squares algorithm. A polynomial of the fourth order was calculated through the points in the z-axis (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.

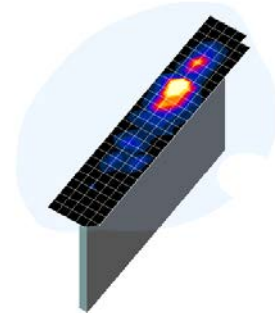


Figure 3-1
Sample SAR Area Scan

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

Frequency	Maximum Area Scan Resolution (mm) ($\Delta x_{\text{area}}, \Delta y_{\text{area}}$)	Maximum Zoom Scan Resolution (mm) ($\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$)	Maximum Zoom Scan Spatial Resolution (mm)			Minimum Zoom Scan Volume (mm) (x,y,z)
			Uniform Grid	Graded Grid		
				$\Delta z_{\text{zoom}}(n)$	$\Delta z_{\text{zoom}}(1)^*$	
≤ 2 GHz	≤ 15	≤ 8	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
2-3 GHz	≤ 12	≤ 5	≤ 5	≤ 4	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 30
3-4 GHz	≤ 12	≤ 5	≤ 4	≤ 3	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 28
4-5 GHz	≤ 10	≤ 4	≤ 3	≤ 2.5	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 25
5-6 GHz	≤ 10	≤ 4	≤ 2	≤ 2	≤ 1.5* $\Delta z_{\text{zoom}}(n-1)$	≥ 22

*Also compliant to IEEE 1528:2013 Table 6

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4 DEFINITION OF REFERENCE POINTS

4.1 EAR REFERENCE POINT

Figure 4-2 shows the front, back and side views of the SAM Twin Phantom. The point “M” is the reference point for the center of the mouth, “LE” is the left ear reference point (ERP), and “RE” is the right ERP. The ERP is 15mm posterior to the entrance to the ear canal (EEC) along the B-M line (Back-Mouth), as shown in Figure 4-1. The plane passing through the two ear canals and M is defined as the Reference Plane. The line N-F (Neck-Front), also called the Reference Pivoting Line, is not perpendicular to the reference plane (see Figure 4-1). Line B-M is perpendicular to the N-F line. Both N-F and B-M lines are marked on the external phantom shell to facilitate handset positioning [18].

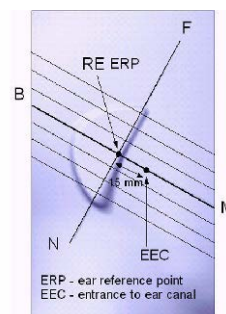


Figure 4-1
Close-Up Side view of
ERP

4.2 HANDSET REFERENCE POINTS

Two imaginary lines on the handset were established: the vertical centerline and the horizontal line. The test device was placed in a normal operating position with the acoustic output located along the “vertical centerline” on the front of the device aligned to the “ear reference point” (See Figure 4-3). The acoustic output was then located at the same level as the center of the ear reference point. The test device was positioned so that the “vertical centerline” was bisecting the front surface of the handset at its top and bottom edges, positioning the “ear reference point” on the outer surface of the both the left and right head phantoms on the ear reference point.



Figure 4-2
Front, back and side view of SAM Twin Phantom

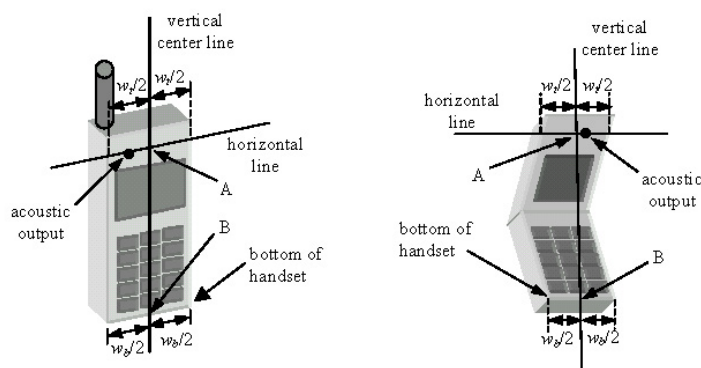


Figure 4-3
Handset Vertical Center & Horizontal Line Reference Points

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5 TEST CONFIGURATION POSITIONS

5.1 Device Holder

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

5.2 Positioning for Cheek

1. The test device was positioned with the device close to the surface of the phantom such that point A is on the (virtual) extension of the line passing through points RE and LE on the phantom (see Figure 5-1), such that the plane defined by the vertical center line and the horizontal line of the phone is approximately parallel to the sagittal plane of the phantom.

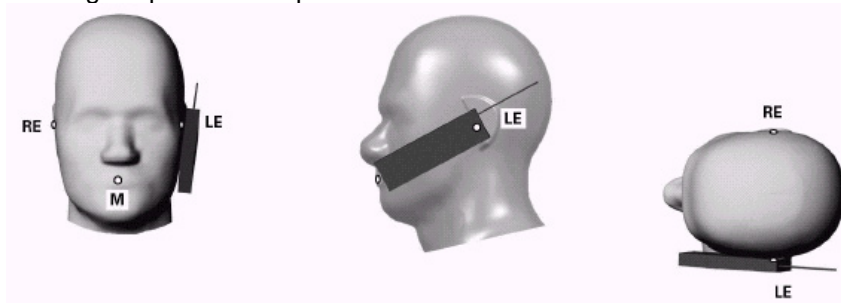


Figure 5-1 Front, Side and Top View of Cheek Position

2. The handset was translated towards the phantom along the line passing through RE & LE until the handset touches the pinna.
3. While maintaining the handset in this plane, the handset was rotated around the LE-RE line until the vertical centerline was in the reference plane.
4. The phone was then rotated around the vertical centerline until the phone (horizontal line) was symmetrical with respect to the line NF.
5. While maintaining the vertical centerline in the reference plane, keeping point A on the line passing through RE and LE, and maintaining the device contact with the ear, the device was rotated about the NF line until any point on the handset made contact with a phantom point below the ear (cheek) (See Figure 5-2).

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5.3 Positioning for Ear / 15° Tilt

With the test device aligned in the “Cheek Position”:

1. While maintaining the orientation of the phone, the phone was retracted parallel to the reference plane far enough to enable a rotation of the phone by 15degrees.
2. The phone was then rotated around the horizontal line by 15 degrees.
3. While maintaining the orientation of the phone, the phone was moved parallel to the reference plane until any part of the handset touched the head. (In this position, point A was located on the line RE-LE). The tilted position is obtained when the contact is on the pinna. If the contact was at any location other than the pinna, the angle of the phone would then be reduced. In this situation, the tilted position was obtained when any part of the phone was in contact of the ear as well as a second part of the phone was in contact with the head (see Figure 5-2).

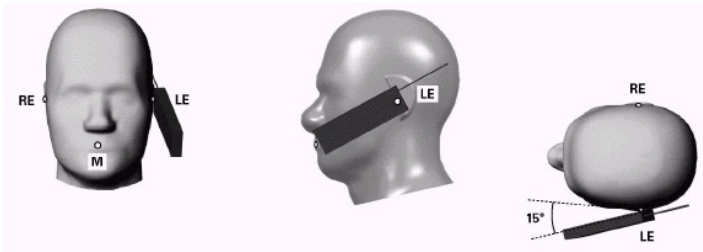


Figure 5-2 Front, Side and Top View of Ear/15° Tilt Position

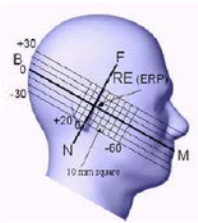


Figure 5-3
Side view w/ relevant markings

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6 RF EXPOSURE LIMITS

6.1 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.

6.2 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.

6.3 RF Exposure Limits for Frequencies Below 6 GHz

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

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (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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6.4 RF Exposure Limits for Frequencies Above 6 GHz

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m² or mW/cm².

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

Table 6-2
Human Exposure Limits Specified in FCC 47 CFR §1.1310

Human Exposure to Radiofrequency (RF) Radiation Limits		
Frequency Range [MHz]	Power Density [mW/cm ²]	Average Time [Minutes]
(A) Limits For Occupational / Controlled Environments		
1,500 – 100,000	5.0	6
(B) Limits For General Population / Uncontrolled Environments		
1,500 – 100,000	1.0	30

Note: 1.0 mW/cm² is 10 W/m²

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7 MEASUREMENT PROCEDURES

7.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, 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.

7.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations of 802.11 transmitters are not suitable for SAR measurements. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset-based test mode software to ensure the results are consistent and reliable. See KDB Publication 248227 D01v02r02 for more details.

7.3 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters.

A periodic duty factor is required for current generation SAR systems to measure SAR. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

7.4 Initial Test Position Procedure

For exposure conditions with multiple test positions, such as handset operating next to the ear, devices with hotspot mode or UMPC mini-tablet, procedures for initial test position can be applied. Using the transmission mode determined by the DSSS procedure or initial test configuration, area scans are measured for all positions in an exposure condition. The test position with the highest extrapolated (peak) SAR is used as the initial test position. When reported SAR for the initial test position is ≤ 0.4 W/kg, no additional testing for the remaining test positions is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is ≤ 0.8 W/kg or all test positions are measured. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7.5 OFDM Transmission Mode and SAR Test Channel Selection

When the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11a, 802.11n and 802.11ac or 802.11g and 802.11n with the same channel bandwidth, modulation and data rate etc., the

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lower order 802.11 mode i.e., 802.11a, then 802.11n and 802.11ac or 802.11g then 802.11n, is used for SAR measurement. Per April 2019 TCB Workshop guidance, 802.11ax was considered the highest order 802.11 mode. When the maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

7.6 Initial Test Configuration Procedure

For OFDM, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order IEEE 802.11 mode. The channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is ≤ 0.8 W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is ≤ 1.2 W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements (See Section 7.2.3). When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7.7 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is ≤ 1.2 W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

7.8 MIMO SAR Considerations

Per KDB Publication 248227 D01v02r02, the simultaneous SAR provisions in KDB Publication 447498 D01v06 should be applied to determine simultaneous transmission SAR test exclusion for WIFI MIMO. If the sum of 1g single transmission chain SAR measurements is <1.6 W/kg, no additional SAR measurements for MIMO are required. Alternatively, SAR for MIMO can be measured with all antennas transmitting simultaneously at the specified maximum output power of MIMO operation. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

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8 RF CONDUCTED POWERS

Table 8-1
RCV Reduced 6 GHz WLAN Maximum Average RF Power – 802.11ax 80 MHz BW

6GHz (80MHz) 802.11ax Conducted Power [dBm]				
Freq [MHz]	Channel	ANT1	ANT2	MIMO
5985	7	9.54	9.41	12.49
6305	71	9.33	9.44	12.40
6545	119	9.81	9.76	12.80
6785	167	9.32	9.58	12.46
7025	215	9.41	9.50	12.47

Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.

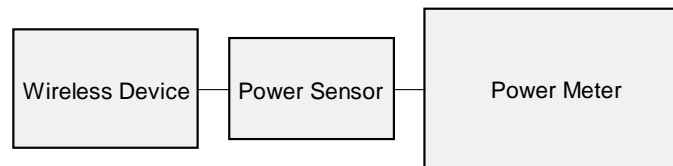


Figure 8-1
Power Measurement Setup

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9 SYSTEM VERIFICATION

9.1 SAR Test System Verification

Table 9-1
Measured 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
5/30/2023	6500 Head	21.2	6000	5.701	35.244	5.480	35.100	4.03%	0.41%
			6025	5.734	35.188	5.510	35.070	4.07%	0.34%
			6065	5.786	35.105	5.557	35.022	4.12%	0.24%
			6075	5.799	35.085	5.569	35.010	4.13%	0.21%
			6085	5.811	35.064	5.580	34.998	4.14%	0.19%
			6185	5.936	34.861	5.698	34.878	4.18%	-0.05%
			6275	6.047	34.684	5.805	34.770	4.17%	-0.25%
			6285	6.059	34.665	5.816	34.758	4.18%	-0.27%
			6305	6.084	34.627	5.840	34.734	4.18%	-0.31%
			6345	6.134	34.557	5.887	34.686	4.20%	-0.37%
			6475	6.290	34.335	6.041	34.530	4.12%	-0.56%
			6485	6.302	34.317	6.052	34.518	4.13%	-0.58%
			6500	6.320	34.291	6.070	34.500	4.12%	-0.61%
			6505	6.327	34.282	6.076	34.494	4.13%	-0.61%
			6545	6.376	34.203	6.122	34.446	4.15%	-0.71%
			6665	6.526	33.958	6.265	34.302	4.17%	-1.00%
			6675	6.538	33.938	6.273	34.290	4.22%	-1.03%
			6685	6.551	33.918	6.285	34.278	4.23%	-1.05%
			6715	6.589	33.861	6.319	34.242	4.27%	-1.11%
			6785	6.674	33.740	6.400	34.158	4.28%	-1.22%
			6825	6.723	33.675	6.447	34.110	4.28%	-1.28%
			6985	6.912	33.423	6.633	33.918	4.21%	-1.46%
			6995	6.923	33.407	6.644	33.906	4.20%	-1.47%
			7000	6.929	33.398	6.650	33.900	4.20%	-1.48%
			7005	6.935	33.389	6.656	33.894	4.19%	-1.49%
			7025	6.958	33.352	6.680	33.870	4.16%	-1.53%
			7500	7.553	32.505	7.240	33.300	4.32%	-2.39%
			7980	8.133	31.674	7.816	32.724	4.06%	-3.21%
			8000	8.160	31.652	7.840	32.700	4.08%	-3.20%

The above measured tissue parameters were used in the DASY software. The DASY 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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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 SAR System Validation Appendix.

Table 9-2
System Verification Results

System Verification TARGET & MEASURED																				
SAR System #	Tissue Frequency (MHz)	Tissue Type	Date	Amb. Temp (°C)	Liquid Temp (°C)	Input Power (W)	Source SN	Probe SN	Measured SAR _{10g} (W/kg)	1 W Target SAR _{10g} (W/kg)	1 W Normalized SAR _{10g} (W/kg)	Deviation _{10g} (%)	Measured SAR _{10g} (W/kg)	1 W Target SAR _{10g} (W/kg)	1 W Normalized SAR _{10g} (W/kg)	Deviation _{10g} (%)	Measured 4cm ² APD (W/m ²)	1W Target 4cm ² APD (W/m ²)	1 W Normalized 4cm ² APD (W/m ²)	Deviation 4cm ² APD (%)
AM2	6500	Head	05/30/2023	21.8	20.7	0.025	1019	7308	7.870	295.000	314.800	6.71%	1.420	54.000	56.800	5.19%	34.8000	1310.0000	1392.000	6.26%

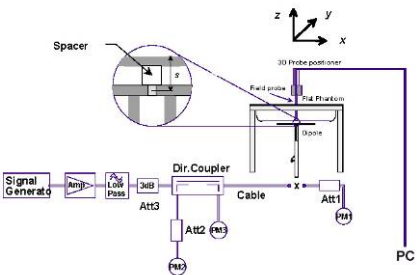


Figure 9-1
System Verification Setup Diagram



Figure 9-2
System Verification Setup Photo

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10 DATA SUMMARY

10.1 SAR and Absorbed Power Density Results

Table 10-1
6 GHz WLAN Head MIMO SAR

MEASUREMENT RESULTS																		
FREQUENCY		Mode	Service	Bandwidth [MHz]	Conducted Power (Ant 1) [dBm]	Maximum Allowed Power (Ant 2) [dBm]	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Side	Test Position	Antenna Config.	Data Rate (Mbps)	Duty Cycle (%)	SAR (1g)	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Reported SAR (1g)	Plot #
MHz	Ch.													(W/kg)			(W/kg)	
6545.00	119	802.11ax	OFDM	80	9.81	10.00	9.76	-0.04	Right	Cheek	MIMO	68.1	99.70	0.070	1.057	1.003	0.074	
6545.00	119	802.11ax	OFDM	80	9.81	10.00	9.76	-0.04	Right	Tilt	MIMO	68.1	99.70	0.052	1.057	1.003	0.055	
6545.00	119	802.11ax	OFDM	80	9.81	10.00	9.76	-0.04	Left	Cheek	MIMO	68.1	99.70	0.108	1.057	1.003	0.114	A1
6545.00	119	802.11ax	OFDM	80	9.81	10.00	9.76	0.15	Left	Tilt	MIMO	68.1	99.70	0.053	1.057	1.003	0.056	
5985.00	7	802.11ax	OFDM	80	9.54	10.00	9.41	-0.02	Left	Cheek	MIMO	68.1	99.70	0.057	1.146	1.003	0.066	
6305.00	71	802.11ax	OFDM	80	9.33	10.00	9.44	0.02	Left	Cheek	MIMO	68.1	99.70	0.093	1.167	1.003	0.109	
6785.00	167	802.11ax	OFDM	80	9.32	10.00	9.58	-0.08	Left	Cheek	MIMO	68.1	99.70	0.096	1.169	1.003	0.113	
7025.00	215	802.11ax	OFDM	80	9.41	10.00	9.50	0.10	Left	Cheek	MIMO	68.1	99.70	0.083	1.146	1.003	0.095	
ANSI / IEEE C95.1 1992 - SAFETY LIMIT Spatial Peak Uncontrolled Exposure/General Population										Head 1.6 W/kg (mW/g) averaged over 1 gram								

Note: To achieve the 13 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 10 dBm.

Table 10-2
6 GHz WLAN Head MIMO Absorbed Power Density

FREQUENCY		Mode	Service	Bandwidth [MHz]	Maximum Allowed Power (Ant 1) [dBm]	Conducted Power (Ant 1) [dBm]	Maximum Allowed Power (Ant 2) [dBm]	Conducted Power (Ant 2) [dBm]	Power Drift [dB]	Side	Test Position	Antenna Config.	Data Rate (Mbps)	Duty Cycle (%)	Measured APD	Scaling Factor (Power)	Scaling Factor (Duty Cycle)	Scaled APD	Plot #
MHz	Ch.														W/m² (4cm²)			W/m² (4cm²)	
6545.00	119	802.11ax	OFDM	80	10.00	9.81	10.00	9.76	-0.04	Right	Cheek	MIMO	68.1	99.70	0.402	1.057	1.003	0.426	
6545.00	119	802.11ax	OFDM	80	10.00	9.81	10.00	9.76	-0.04	Right	Tilt	MIMO	68.1	99.70	0.247	1.057	1.003	0.262	
6545.00	119	802.11ax	OFDM	80	10.00	9.81	10.00	9.76	-0.04	Left	Cheek	MIMO	68.1	99.70	0.677	1.057	1.003	0.718	A1
6545.00	119	802.11ax	OFDM	80	10.00	9.81	10.00	9.76	0.15	Left	Tilt	MIMO	68.1	99.70	0.265	1.057	1.003	0.281	
5985.00	7	802.11ax	OFDM	80	10.00	9.54	10.00	9.41	-0.02	Left	Cheek	MIMO	68.1	99.70	0.184	1.146	1.003	0.211	
6305.00	71	802.11ax	OFDM	80	10.00	9.33	10.00	9.44	0.02	Left	Cheek	MIMO	68.1	99.70	0.580	1.167	1.003	0.679	
6785.00	167	802.11ax	OFDM	80	10.00	9.32	10.00	9.58	-0.08	Left	Cheek	MIMO	68.1	99.70	0.536	1.169	1.003	0.628	
7025.00	215	802.11ax	OFDM	80	10.00	9.41	10.00	9.50	0.10	Left	Cheek	MIMO	68.1	99.70	0.429	1.146	1.003	0.493	

Note: To achieve the 13 dBm maximum allowed MIMO power shown in the documentation, each antenna transmits at a maximum allowed power of 10 dBm.

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SAR and Absorbed Power Density General Notes:

1. The test data reported are the worst-case SAR values according to test procedures specified in IEEE 1528-2013, and FCC KDB Publication 447498 D01v06.
2. Batteries are fully charged at the beginning of the SAR measurements.
3. Liquid tissue depth was at least 15.0 cm for all frequencies.
4. 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.
5. SAR results were scaled to the maximum allowed power to demonstrate compliance per FCC KDB Publication 447498 D01v06.
6. Per October 2020 TCB Workshop notes, absorbed power density (APD) using a 4cm² averaging area is reported based on SAR measurements.
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 for 1g SAR and less than 2.0 W/kg for 10g SAR.

WLAN Notes:

1. Per KDB Publication 248227 D01v02r02, SAR for MIMO was evaluated by following the simultaneous SAR provisions from KDB Publication 447498 D01v06 by making a SAR measurement with both antennas transmitting simultaneously.
2. When the maximum reported 1g averaged SAR is ≤ 0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was ≤ 1.20 W/kg for 1g evaluations or all test channels were measured.
3. The device was 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. The reported SAR was scaled to the 100% transmission duty factor to determine compliance. Procedures used to measure the duty factor are identical to that in the associated EMC test reports.
4. Per FCC guidance, SAR was performed using 6.5 GHz SAR probe calibration factors. Per October 2020 TCB Workshop notes, 5 channels were tested.

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11 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
-	WL25-1	Conducted Cable Set (25GHz)	7/29/2022	Annual	7/29/2023	WL25-1
Agilent	N9038A	MXE EMI Receiver	N/A	N/A	N/A	MY51210133
Rohde & Schwarz	FSW67	Signal / Spectrum Analyzer	N/A	N/A	N/A	103200
Sunol	JB5	Bi-Log Antenna (30M - 5GHz)	N/A	N/A	N/A	A051107
Emco	3115	Horn Antenna (1-18GHz)	N/A	N/A	N/A	9704-5182
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433975
Keysight Technologies	N9030A	3Hz-44GHz PXA Signal Analyzer	8/18/2022	Annual	8/18/2023	MY49430494
SPEAG	EX3DV4	SAR Probe	2/13/2023	Annual	2/13/2024	7308
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/15/2023	Annual	2/15/2024	467
SPEAG	D6.5GHzV2	6.5GHz SAR Dipole	12/7/2022	Annual	12/7/2023	1019
Control Company	4352	Long Stem Thermometer	9/10/2021	Biennial	9/10/2023	210774678
Control Company	4040	Therm./Clock/Humidity Monitor	1/17/2023	Biennial	1/17/2025	160574418
Agilent	SMF100A	Signal Generator	3/28/2022	Biennial	3/28/2024	101590
SPEAG	DAK-3.5	Dielectric Assessment Kit	8/15/2022	Annual	8/15/2023	1041
Mitutoyo	500-196-30	CD-6" ASX 6Inch Digital Caliper	2/16/2022	Triennial	2/16/2025	A20238413
Rohde & Schwarz	ZNB40	Vector Network Analyzer	10/12/2022	Annual	10/12/2023	101412
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Narda	BW-S3W2	Attenuator (3dB)	CBT	N/A	CBT	120
MiniCircuits	ZUDC10-83-S+	Directional Coupler	CBT	N/A	CBT	2050
Pasternack	PE5011-1	Torque Wrench	12/21/2021	Biennial	12/21/2023	82475
Anritsu	MA2411B	Pulse Power Sensor	1/10/2023	Annual	1/10/2024	1315051
Anritsu	MA2411B	Pulse Power Sensor	10/21/2022	Annual	10/21/2023	1207364
SPEAG	MAIA	Modulation and Audio Interference Analyzer	N/A	N/A	N/A	1520
Pasternack	PE87FL1017	Low Pass Filter	CBT	N/A	CBT	N/A

Note:

- Each equipment item was used solely within its respective calibration period.
- 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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12 MEASUREMENT UNCERTAINTIES

Applicable for SAR measurements:

a	b	c	d	e= f(d,k)	f	g	h = c x f/e	i = c x g/e	k
Uncertainty Component	IEEE 1528 Sec.	Tol. (± %)	Prob. Dist.	Div.	c _i 1gm	c _i 10 gms	1gm u _i (± %)	10gms u _i (± %)	v _i
Measurement System									
Probe Calibration	E.2.1	9.3	N	1	1	1	9.3	9.3	∞
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	E.5	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)	E.3.1	7.6	R	1.73	1.0	1.0	4.4	4.4	∞
Liquid Conductivity - measurement uncertainty	E.3.3	4.3	N	1	0.78	0.71	3.3	3.0	76
Liquid Permittivity - measurement uncertainty	E.3.3	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 Uncertainty	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)							RSS	13.8	13.6
Expanded Uncertainty (95% CONFIDENCE LEVEL)							k=2	27.6	27.1

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14 CONCLUSION

14.1 Measurement Conclusion

The SAR and power density measurements indicate that the DUT complies with the RF radiation exposure limits of the FCC, 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 RF Exposure 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.

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