

## RF Exposure report



The following samples were submitted and identified on behalf of the client as:

|                     |  |
|---------------------|--|
| EUT Description     | Bluetooth USB Adapter (BTD 700)  |
| Brand Name          | SENNHEISER   |
| Model No.           | BTD 700  |
| Applicant           | Sonova Consumer Hearing GmbH<br>Am Labor 1, 30900 Wedemark, Germany                |
| Standards           | IEEE/ANSI C95.1-1992, IEEE 1528-2013 /<br>RSS102 Issue 6, IEC/IEEE 62209-1528:2020 |
| FCC ID              | 2A3ULBTD700  |
| IC                  | 28115-BTD700   |
| Date of EUT Receipt | Oct. 11, 2024  |
| Date of Test(s)     | Oct. 13, 2024 ~ Nov. 19, 2024  |
| Date of Issue       | Jan. 09, 2025  |

In the configuration tested, the EUT complied with the standards specified above.

**Remarks:**

This report details the results of the testing carried out on one sample, the results contained in this test report do not relate to other samples of the same product. The manufacturer should ensure that all products in series production are in conformity with the product sample detailed in this report.

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**Signed on behalf of SGS**

| Clerk / Cindy Chou | PM / Ruby Ou | Approved By / John Yeh |
|--------------------|--------------|------------------------|
|                    |              |                        |

Date: Jan. 09, 2025

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## Revision History

| Report Number    | Revision | Description                  | Issue Date    | Revised By | Remark |
|------------------|----------|------------------------------|---------------|------------|--------|
| TESA2410000640ES | 00       | Initial creation of document | Jan. 09, 2025 | Cindy Chou |        |
|                  |          |                              |               |            |        |
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Note:

1. The mark " \* " is the revised version of the report due to comments submitted by the certification.

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## Contents

|           |  |           |
|-----------|--|-----------|
| <b>1</b>  | <b>GENERAL INFORMATION .....</b>                                   | <b>4</b>  |
| 1.1       | Test Methodology .....   | 4         |
| 1.2       | Description of EUT.....  | 5         |
| 1.3       | Maximum value .....  | 6         |
| <b>2</b>  | <b>MEASUREMENT SYSTEM .....</b>                                    | <b>7</b>  |
| 2.1       | Test Facility .....  | 7         |
| 2.2       | SAR System .....   | 8         |
| <b>3</b>  | <b>SAR SYSTEM VERIFICATION.....</b>                                | <b>11</b> |
| 3.1       | Tissue Simulating Liquid.....                                      | 11        |
| 3.2       | Tissue Simulant Liquid measurement .....                           | 11        |
| 3.3       | Measurement results of Tissue Simulant Liquid.....                 | 11        |
| 3.4       | The composition of the tissue simulating liquid:.....              | 12        |
| 3.5       | System check .....   | 12        |
| 3.6       | System check results .....   | 13        |
| <b>4</b>  | <b>TEST CONFIGURATIONS .....</b>                                   | <b>14</b> |
| 4.1       | Test Environment.....  | 14        |
| 4.2       | Test Note.....   | 14        |
| 4.3       | Test position.....   | 15        |
| 4.4       | FCC Test limit .....   | 16        |
| 4.5       | ISED Test limit .....  | 19        |
| <b>5</b>  | <b>MAXIMUM OUTPUT POWER .....</b>                                  | <b>20</b> |
| 5.1       | Bluetooth .....  | 20        |
| 5.2       | BLE.....   | 20        |
| 5.3       | QHS .....  | 21        |
| <b>6</b>  | <b>DUTY CYCLE .....</b>  | <b>22</b> |
| <b>7</b>  | <b>SUMMARY OF RESULTS .....</b>                                    | <b>23</b> |
| 7.1       | Decision rules .....   | 23        |
| 7.2       | Summary of SAR Results.....  | 23        |
| 7.3       | Reporting statements of conformity .....                           | 23        |
| 7.4       | Conclusion .....   | 23        |
| <b>8</b>  | <b>INSTRUMENTS LIST .....</b>                                      | <b>24</b> |
| <b>9</b>  | <b>UNCERTAINTY BUDGET .....</b>                                    | <b>25</b> |
| <b>10</b> | <b>SAR MEASUREMENT RESULTS .....</b>                               | <b>26</b> |
| <b>11</b> | <b>SAR SYSTEM CHECK RESULTS.....</b>                               | <b>27</b> |
| <b>12</b> | <b>APPENDIXES .....</b>  | <b>28</b> |
| 12.1      | SAR_Appendix A Photographs .....                                   | 28        |
| 12.2      | SAR_Appendix B DAE & Probe Cal. Certificate .....                  | 28        |
| 12.3      | SAR_Appendix C Phantom Description & Dipole Cal. Certificate ..... | 28        |

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## 1 GENERAL INFORMATION

### 1.1 Test Methodology

The SAR testing method and procedure for this device is in accordance with the following standards:

IEEE/ANSI C95.1-1992

IEEE 1528-2013

KDB447498D01v06

KDB447498D02v06

KDB865664D01v01r04

KDB865664D02v01r02

RSS102 Issue 6

IEC/IEEE 62209-1528:2020

RSS-102.SAR.MEAS Issue 1

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## 1.2 Description of EUT

|   |  |
|---|--|
| EUT Description                           | Bluetooth USB Adapter (BTD 700)  |
| Brand Name                                | SENNHEISER   |
| Model No.                                 | BTD 700  |
| FCC ID                                    | 2A3ULBTD700  |
| IC  | 28115-BTD700   |
| Serial Number / Status of EUT             | Engineering sample   |
| Power Ratings                             | 5Vdc, 100mA  |
| Operating Temperature range               | 0°C - +40°C  |
| Modulation Type                           | BDR & EDR: GFSK, $\pi/4$ DQPSK, 8DPSK, BLE 1M/2M: GFSK QHS: $\pi/4$ QPSK (2Mbps, 3Mbps), $\pi/4$ DQPSK (4Mbps), 8PSK (5Mbps), D8PSK(6Mbps) |
| Transmission Technology                   | BDR & EDR / QHS: FHSS, BLE 1M/2M: DSSS   |
| Technology                                | Bluetooth, QHS (HSL-C or HSL-L)  |
| Operating Frequency                       | BDR & EDR: 2402 - 2480MHz, BLE 1M: 2402 - 2480MHz, BLE 2M/QHS: 2404 - 2478MHz (for Frequency Band: 2400-2483.5MHz)                         |
| No. of channels                           | BDR & EDR: 79, BLE: 40, QHS: 38 (HSL-L excluding 2426MHz channel)  |
| Channel Spacing                           | BDR & EDR: 1MHz, BLE/QHS: 2MHz   |
| Channel Bandwidth                         | BDR & EDR: 79MHz, BLE: 80MHz, QHS: 76MHz   |
| Data Transfer Rate                        | BDR: 1Mbps , EDR: 2Mbps/3Mbps<br>BLE 4.0: 1Mbps , BLE 5.4: 2Mbps, QHS: 2/3/4/5/6Mbps   |
| Antenna Type                              | Monopole   |
| Antenna Gain                              | 0.42dBi  |
| Maximum Tune up power - conducted average | 9.5dB  |
| HW Version                                | R2   |
| SW Version                                | V2.02.00   |
| Cable supplied / Device ports             | NA   |

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|  |                        |                              |
|--|------------------------|------------------------------|
| Accessory Device                           | USB-C to USB-A Adapter |                              |
| Duty Cycle                                 | Bluetooth              | Please refer to section 7    |
| Supported radios (TX Frequency Range, MHz) | Bluetooth              | 2.4GHz (2400.0 – 2483.5 MHz) |

### 1.3 Maximum value

| Summary of Maximum SAR |                       |
|------------------------|-----------------------|
| Mode                   | Highest SAR 1g (W/kg) |
| Bluetooth/ QHS         | 0.18                  |

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## 2 MEASUREMENT SYSTEM

### 2.1 Test Facility

| Laboratory  | Test Site Address   | Test Site Name | FCC Designation number | IC CAB identifier |
|---|---|----------------|------------------------|-------------------|
| SGS Taiwan Ltd.<br>Central RF Lab.<br>(TAF code 3702) | 1F, No. 8, Alley 15, Lane 120,<br>Sec. 1, NeiHu Road, NeiHu<br>District, Taipei City, 11493,<br>Taiwan.     | SAR 2          | TW0029                 | TW3702            |
|   |   | SAR 6          |                        |                   |
|   |   | SAR 8          |                        |                   |
|   | No. 2, Keji 1st Rd., Guishan<br>Township, Taoyuan County,<br>33383, Taiwan                                  | SAR 1          | TW0028                 |                   |
|   |   | SAR 4          |                        |                   |
|   | <b>No.134, Wu Kung Road,<br/>New Taipei Industrial Park,<br/>Wuku District, New Taipei<br/>City, Taiwan</b> | SAR 3          | TW0027                 |                   |
|   |   | <b>SAR 7</b>   |                        |                   |

**Note:** Test site name is remarked on the equipment list in each section of this report as an indication where measurements occurred in specific test site and address.

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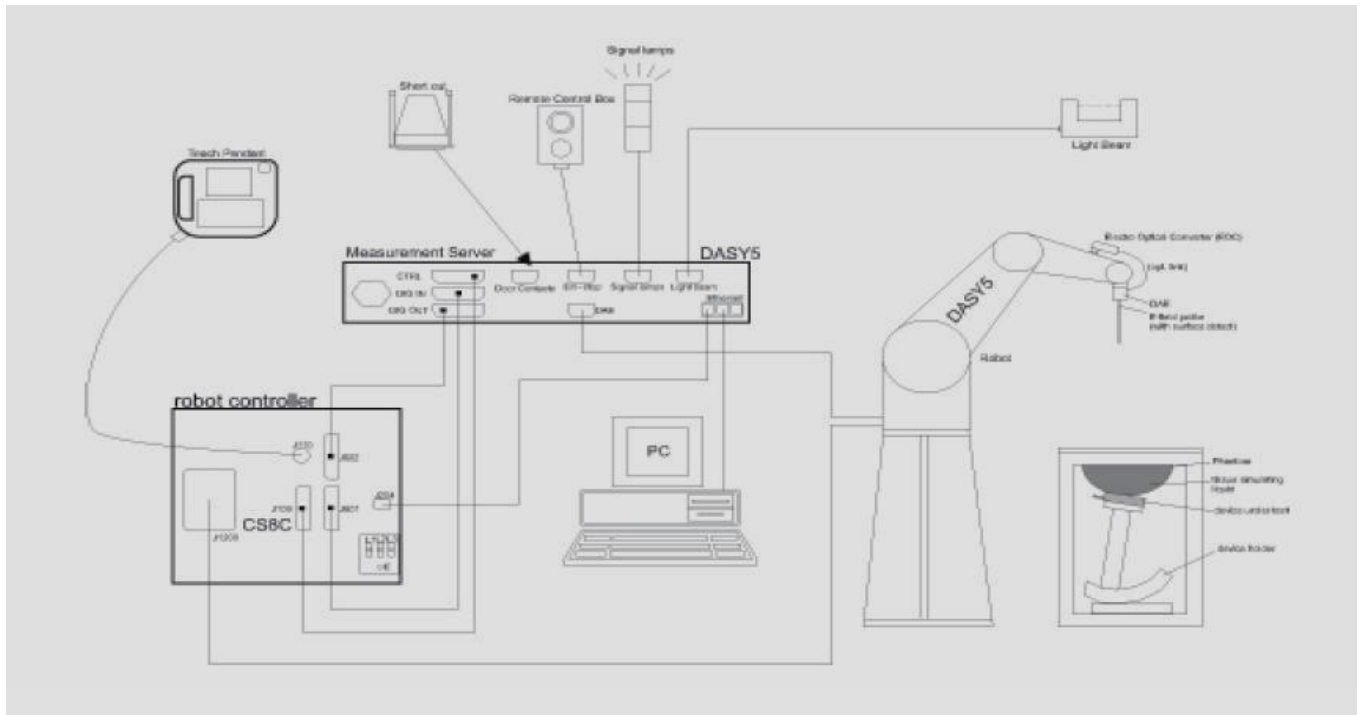
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## 2.2 SAR System

### Block Diagram (DASY5)

A block diagram of the SAR measurement System is given in below. This SAR measurement system uses a computer-controlled 3-D stepper motor system (SPEAG DASY 5 professional system). The model EX3DV4 field probe is used to determine the internal electric fields. The SAR can be obtained from the equation  $SAR = \sigma (|E|)^2 / \rho$  where  $\sigma$  and  $\rho$  are the conductivity and mass density of the tissue-simulant.




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## EX3DV4 E-Field Probe

|               |  |   |  |
|---------------|--|---|--|
| Construction  | Symmetrical design with triangular core<br>Built-in shielding against static charges<br>PEEK enclosure material (resistant to organic solvents, e.g., DGBE)  |  |  |
| Calibration   | Basic Broad Band Calibration in air Conversion Factors (CF) for HSL<br>2450 MHz Additional CF for other liquids and frequencies upon request   |   |  |
| Frequency     | 10 MHz to > 6 GHz  |   |  |
| Directivity   | ± 0.3 dB in HSL (rotation around probe axis)<br>± 0.5 dB in tissue material (rotation normal to probe axis)  |   |  |
| Dynamic Range | 10 µW/g to > 100 mW/g<br>Linearity: ± 0.2 dB (noise: typically < 1 µW/g)   |   |  |
| Dimensions    | Tip diameter: 2.5 mm   |   |  |
| Application   | High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields). Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%. |   |  |

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## PHANTOM (ELI)

|                 |   |   |
|-----------------|---|---|
| Model           | ELI   |   |
| Construction    | The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles. |   |
| Shell Thickness | 2 ± 0.2 mm  |  |
| Filling Volume  | Approx. 30 liters   |   |
| Dimensions      | Major axis: 600 mm<br>Minor axis: 400 mm  |   |

## DEVICE HOLDER

|              |   |  |
|--------------|---|--|
| Construction | The device holder (Supporter) for Notebook is made by POM (polyoxymethylene resin) , which is non-metal and non-conductive. The height can be adjusted to fit varies kind of notebooks. |  |
|              |   | Device Holder  |

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### 3 SAR SYSTEM VERIFICATION

#### 3.1 Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with homogeneous tissue simulating liquid. For head SAR testing, the liquid height from the ear rint (ERP) of the phantom to the liquid top surface is larger than 15cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15cm.

#### 3.2 Tissue Simulant Liquid measurement

The dielectric properties for this Head-simulant fluid were measured by using the SPEAG Dielectric Assessment Kit (DAKS-3.5)

All dielectric parameters of tissue simulates were measured within 24 hours of SAR measurements. The measured conductivity and permittivity are all within  $\pm 5\%$  of the target values.

#### 3.3 Measurement results of Tissue Simulant Liquid

| Measured Frequency (MHz) | Target Dielectric Constant, $\epsilon_r$ | Target Conductivity, $\sigma$ (S/m) | Measured Dielectric Constant, $\epsilon_r$ | Measured Conductivity, $\sigma$ (S/m) | % dev $\epsilon_r$ | % dev $\sigma$ | Limit     | Measurement Date |
|--------------------------|--|-------------------------------------|--|---------------------------------------|--------------------|----------------|-----------|------------------|
| 2402                     | 39.296                                   | 1.758                               | 40.283                                     | 1.833                                 | 2.51%              | 4.24%          | $\pm 5\%$ | Nov. 19, 2024    |
| 2441                     | 39.218                                   | 1.792                               | 40.203                                     | 1.871                                 | 2.51%              | 4.40%          | $\pm 5\%$ |                  |
| 2450                     | 39.200                                   | 1.800                               | 40.201                                     | 1.882                                 | 2.55%              | 4.56%          | $\pm 5\%$ |                  |
| 2480                     | 39.160                                   | 1.832                               | 40.141                                     | 1.906                                 | 2.51%              | 4.04%          | $\pm 5\%$ |                  |

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### 3.4 The composition of the tissue simulating liquid:

Simulating Liquids for 600 MHz -10 GHz, Manufactured by SPEAG:

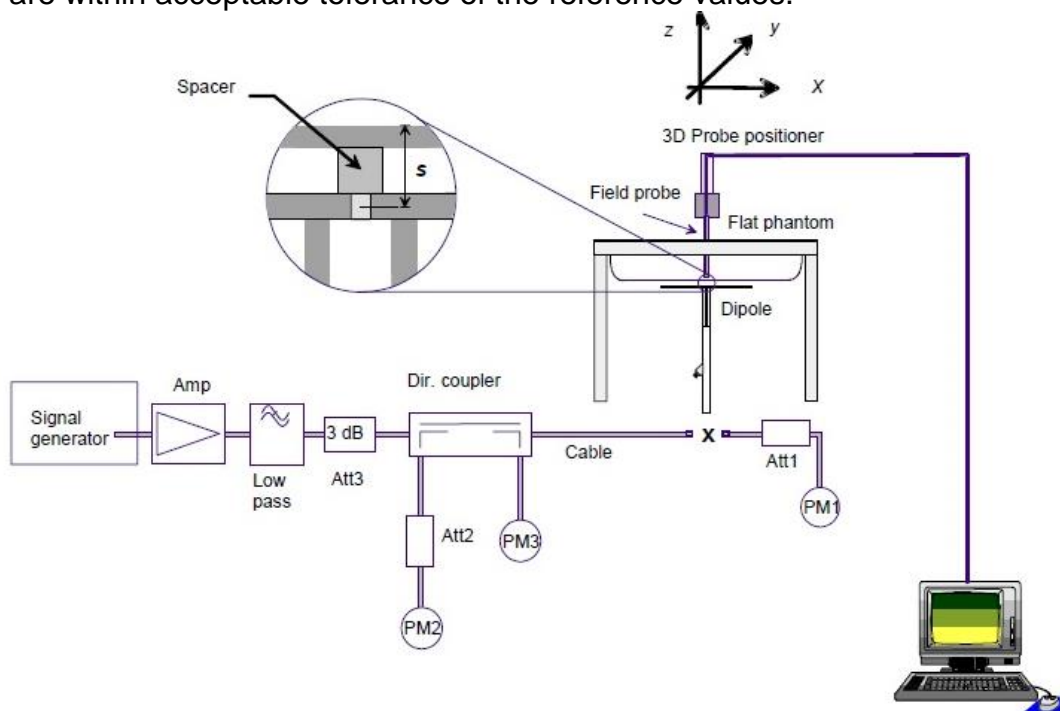
| Broad-band head tissue simulating liquids | SPEAG Product   | Frequency range (MHz) | Main Ingredients |
|---|-----------------|-----------------------|------------------|
|   | HBBL600-10000V6 | 600 - 10000           | Water, Oil       |

### 3.5 System check

The microwave circuit arrangement for system check is sketched in below. The daily system accuracy verification occurs within the flat section of the SAM phantom and ELI phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values.

The tests were conducted on the same days as the measurement of the DUT. The obtained results from the system accuracy verification are displayed with SAR values normalized to 1W forward power delivered to the dipole.

During the tests, the liquid depth from the center of the flat phantom to the liquid top surface was 15 cm above in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



The block diagram of system check

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### 3.6 System check results

| Validation Kit | S/N | Frequency (MHz) | 1W Target 1g-SAR (W/kg) | pin=250mW Measured 1g-SAR (W/kg) | Normalized to 1W 1g-SAR (W/kg) | Deviation (%) | Limit | Measurement Date |
|----------------|-----|-----------------|-------------------------|----------------------------------|--------------------------------|---------------|-------|------------------|
| D2450V2        | 727 | 2450            | 52.7                    | 12.4                             | 49.6                           | -5.88         | ± 10% | Nov.19,2024      |

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## 4 TEST CONFIGURATIONS

### 4.1 Test Environment

Ambient Temperature:  $22 \pm 2^{\circ}\text{C}$

Tissue Simulating Liquid:  $22 \pm 2^{\circ}\text{C}$

### 4.2 Test Note

- **General:** Measurements are performed respectively on the lowest, middle and highest channels of the operating band(s).
- **General:** The EUT is set to maximum power level during all tests, and at the beginning of each test the battery is fully charged.
- **General:** During the SAR testing, the DASY system checks power drift by comparing the e-field strength of one specific location measured at the beginning with that measured at the end of the SAR testing.
- **General:** According to KDB447498D01v06, testing of other required channels is not required when the reported 1-g SAR for the highest output channel is  $\leq 0.8\text{ W/kg}$ , when the transmission band is  $\leq 100\text{ MHz}$ .
- **General:** According to KDB865664D01v01r04, SAR measurement variability must be assessed for each frequency band. When the original highest measured SAR is  $\geq 0.8\text{ W/kg}$ , repeated that measurement once. Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is  $> 1.20$  or when the original or repeated measurement is  $\geq 1.45\text{ W/kg}$  ( $\sim 10\%$  from the 1-g SAR limit).

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### 4.3 Test position

SAR is measured for front, back, right, left and top with 5mm distance.

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#### 4.4 FCC Test limit

##### § 2.1093(d)(1)

Applications for equipment authorization of portable RF sources subject to routine environmental evaluation must contain a statement confirming compliance with the limits specified in § 1.1310 as part of their application. Technical information showing the basis for this statement must be submitted to the Commission upon request. The SAR limits specified in § 1.1310(a) through (c) of this chapter shall be used for evaluation of portable devices transmitting in the frequency range from 100 kHz to 6 GHz. Portable devices that transmit at frequencies above 6 GHz shall be evaluated in terms of the MPE limits specified in Table 1 to § 1.1310(e)(1). A minimum separation distance applicable to the operating configurations and exposure conditions of the device shall be used for the evaluation. In general, maximum time-averaged power levels must be used for evaluation. All unlicensed personal communications service (PCS) devices and unlicensed NII devices shall be subject to the limits for general population/uncontrolled exposure.

Radiofrequency radiation exposure limits.

##### § 1.1310(a)

Specific absorption rate (SAR) shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in § 1.1307(b) within the frequency range of 100 kHz to 6 GHz (inclusive).

##### § 1.1310(b)

The SAR limits for occupational/controlled exposure are 0.4 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 8 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit for occupational/controlled exposure is 20 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 6 minutes to determine compliance with occupational/controlled SAR limits.

##### § 1.1310(c)

The SAR limits for general population/uncontrolled exposure are 0.08 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 1.6 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit is 4 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 30 minutes to determine compliance with general population/uncontrolled SAR limits.

Note to paragraphs (a) through (c):

SAR is a measure of the rate of energy absorption due to exposure to RF electromagnetic energy. These SAR limits to be used for evaluation are based generally on criteria published by the American National Standards Institute (ANSI) for localized SAR in Section 4.2 of "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE Std C95.1-1992, copyright 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017. These criteria for SAR evaluation are similar to those recommended by the National Council on Radiation Protection and Measurements (NCRP) in "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," NCRP Report No. 86, Section 17.4.5, copyright 1986 by NCRP, Bethesda, Maryland 20814. Limits for whole body SAR and peak spatial-average SAR are based

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on recommendations made in both of these documents. The MPE limits in Table 1 are based generally on criteria published by the NCRP in "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," NCRP Report No. 86, Sections 17.4.1, 17.4.1.1, 17.4.2 and 17.4.3, copyright 1986 by NCRP, Bethesda, Maryland 20814. In the frequency range from 100 MHz to 1500 MHz, these MPE exposure limits for field strength and power density are also generally based on criteria recommended by the ANSI in [Section 4.1](#) of "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," ANSI/IEEE Std C95.1-1992, copyright 1992 by the Institute of Electrical and Electronics Engineers, Inc., New York, New York 10017.

Portable devices that transmit at frequencies above 6 GHz shall be evaluated in terms of the MPE limits specified in Table 1 to [§ 1.1310\(e\)\(1\)](#).

According to ANSI/IEEE C95.1-1992, the criteria listed in the following Table shall be used to evaluate the environmental impact of human exposure to radio frequency (RF) radiation as specified in §1.1310.

Peak Spatially Averaged Power Density was evaluated over a circular area of 4cm<sup>2</sup> per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes

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| Frequency range (MHz)                                    | Electric field strength (V/m) | Magnetic field strength (A/m) | Power density (mW/cm <sup>2</sup> ) | Averaging time (minutes) |
|--|-------------------------------|-------------------------------|-------------------------------------|--------------------------|
| (i) Limits for Occupational/Controlled Exposure          |                               |                               |                                     |                          |
| 0.3-3.0  | 614                           | 1.63                          | *(100)                              | ≤6                       |
| 3.0-30   | 1842/f                        | 4.89/f                        | *(900/f <sup>2</sup> )              | <6                       |
| 30-300   | 61.4                          | 0.163                         | 1.0                                 | <6                       |
| 300-1,500  |                               |                               | f/300                               | <6                       |
| 1,500-100,000  |                               |                               | 5                                   | <6                       |
| (ii) Limits for General Population/Uncontrolled Exposure |                               |                               |                                     |                          |
| 0.3-1.34   | 614                           | 1.63                          | *(100)                              | <30                      |
| 1.34-30  | 824/f                         | 2.19/f                        | *(180/f <sup>2</sup> )              | <30                      |
| 30-300   | 27.5                          | 0.073                         | 0.2                                 | <30                      |
| 300-1,500  |                               |                               | f/1500                              | <30                      |
| 1,500-100,000  |                               |                               | 1.0                                 | <30                      |

f = frequency in MHz. \* = Plane-wave equivalent power density.

Table 1 to § 1.1310(e)(1) - Limits for Maximum Permissible Exposure (MPE)

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#### 4.5 ISED Test limit

The SAR limits are summarized in table 3.

**Table 3: SAR basic restrictions limits (100 kHz to 6 GHz)**

| Body region                    | Uncontrolled environment average SAR (W/kg) | Controlled environment average SAR (W/kg) | Averaging time (minutes) | Averaging mass (g) |
|--------------------------------|---|---|--------------------------|--------------------|
| Whole body                     | 0.08  | 0.4                                       | 6                        | whole body         |
| Localized head, neck and trunk | 1.6   | 8   | 6                        | 1                  |
| Localized limbs                | 4   | 20  | 6                        | 10                 |

The localized APD limits are summarized in table 4.

**Table 4: Localized APD basic restrictions limits (6 GHz-300 GHz)**

| Exposure scenario        | Local APD (W/m <sup>2</sup> ) | Exposure duration (minutes) |
|--------------------------|-------------------------------|-----------------------------|
| Uncontrolled environment | 20                            | 6                           |
| Controlled environment   | 100                           | 6                           |

Local APD shall be averaged over a square 4 cm<sup>2</sup> surface area of the body.

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## 5 MAXIMUM OUTPUT POWER

### 5.1 Bluetooth

| Mode   | Channel | Frequency (MHz) | 1Mbps  |                     | 2Mbps  |                     | 3Mbps  |                     |
|--------|---------|-----------------|--|---------------------|--|---------------------|--|---------------------|
|        |         |                 | Max. Rated Avg. Power + Max. Tolerance (dBm) | Average power (dBm) | Max. Rated Avg. Power + Max. Tolerance (dBm) | Average power (dBm) | Max. Rated Avg. Power + Max. Tolerance (dBm) | Average power (dBm) |
| BR/EDR | CH 00   | 2402            | 9.50   | 8.93                | 7.00   | 6.93                | 7.00   | 6.96                |
|        | CH 39   | 2441            |  | 8.47                |  | 6.71                |  | 6.73                |
|        | CH 78   | 2480            |  | 8.75                |  | 6.86                |  | 6.89                |

### 5.2 BLE

| Mode   | Channel | Frequency (MHz) | GFSK   |                            |
|--------|---------|-----------------|--|----------------------------|
|        |         |                 | Max. Rated Avg. Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| BLE_1M | CH 00   | 2402            | 9.50   | 8.89                       |
|        | CH 19   | 2440            |  | 8.44                       |
|        | CH 39   | 2480            |  | 8.81                       |
| Mode   | Channel | Frequency (MHz) | GFSK   |                            |
|        |         |                 | Max. Rated Avg. Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| BLE_2M | CH 00   | 2402            | 9.50   | 8.64                       |
|        | CH 19   | 2440            |  | 8.36                       |
|        | CH 39   | 2480            |  | 8.51                       |

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### 5.3 QHS

| Mode       | Channel | Frequency (MHz) | GFSK  |                            |
|------------|---------|-----------------|---|----------------------------|
|            |         |                 | Max. Rated Avg.Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| QHS(2Mbps) | CH 00   | 2402            | 8.5   | 8.05                       |
|            | CH 19   | 2440            |   | 7.77                       |
|            | CH 39   | 2480            |   | 7.95                       |
| Mode       | Channel | Frequency (MHz) | GFSK  |                            |
|            |         |                 | Max. Rated Avg.Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| QHS(3Mbps) | CH 00   | 2402            | 8.5   | 8.07                       |
|            | CH 19   | 2440            |   | 7.90                       |
|            | CH 39   | 2480            |   | 7.99                       |
| Mode       | Channel | Frequency (MHz) | GFSK  |                            |
|            |         |                 | Max. Rated Avg.Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| QHS(4Mbps) | CH 00   | 2402            | 8.5   | 8.07                       |
|            | CH 19   | 2440            |   | 7.83                       |
|            | CH 39   | 2480            |   | 8.04                       |
| Mode       | Channel | Frequency (MHz) | GFSK  |                            |
|            |         |                 | Max. Rated Avg.Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| QHS(5Mbps) | CH 00   | 2402            | 8.5   | 8.08                       |
|            | CH 19   | 2440            |   | 7.86                       |
|            | CH 39   | 2480            |   | 8.02                       |
| Mode       | Channel | Frequency (MHz) | GFSK  |                            |
|            |         |                 | Max. Rated Avg.Power + Max. Tolerance (dBm) | Average Output Power (dBm) |
| QHS(6Mbps) | CH 00   | 2402            | 8.5   | 8.09                       |
|            | CH 19   | 2440            |   | 7.92                       |
|            | CH 39   | 2480            |   | 8.06                       |

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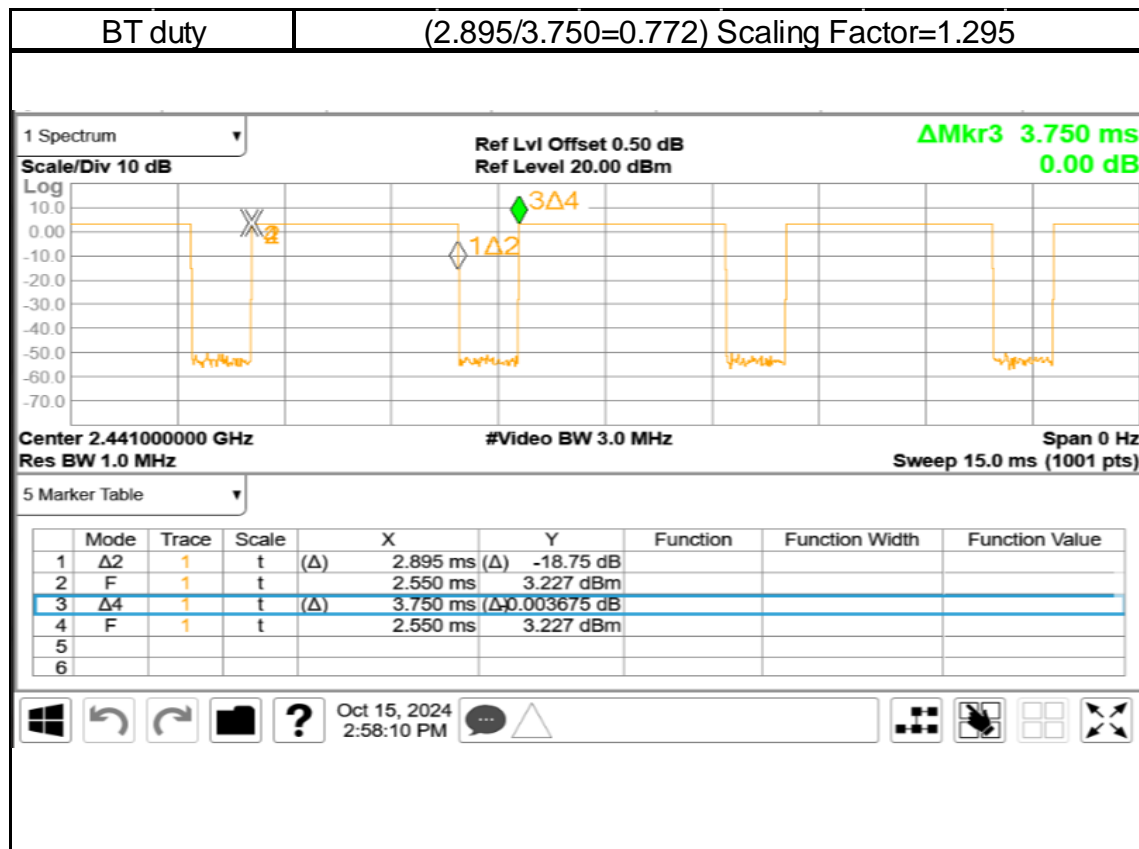
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## 6 DUTY CYCLE



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## 7 SUMMARY OF RESULTS

### 7.1 Decision rules

Reported measurement data comply with Test Methodology in section 1.1.

Determining compliance shall be based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.

### 7.2 Summary of SAR Results

| Band            | Antenna | Position      | Distance (mm) | Channel | Freq. (MHz) | Max. Rated Avg. Power + Max. Tolerance (dBm) | Measured Avg. Power (dBm) | Duty cycle scaling | Power scaling | Averaged SAR over 1g (W/kg) |          | ID  |
|-----------------|---------|---------------|---------------|---------|-------------|--|---------------------------|--------------------|---------------|-----------------------------|----------|-----|
|                 |         |               |               |         |             |  |                           |                    |               | Measured                    | Reported |     |
| Bluetooth(GFSK) | Antenna | Front Surface | 5             | 00      | 2402        | 9.50   | 8.93                      | 1.30               | 113.92%       | 0.121                       | 0.179    | 001 |
| Bluetooth(GFSK) | Antenna | Front Surface | 5             | 39      | 2441        | 9.50   | 8.47                      | 1.30               | 126.65%       | 0.093                       | 0.153    | -   |
| Bluetooth(GFSK) | Antenna | Front Surface | 5             | 78      | 2480        | 9.50   | 8.75                      | 1.30               | 118.75%       | 0.103                       | 0.158    | -   |
| Bluetooth(GFSK) | Antenna | Back Surface  | 5             | 00      | 2402        | 9.50   | 8.93                      | 1.30               | 113.92%       | 0.101                       | 0.149    | -   |
| Bluetooth(GFSK) | Antenna | Top Edge      | 5             | 00      | 2402        | 9.50   | 8.93                      | 1.30               | 113.92%       | 0.018                       | 0.027    | -   |
| Bluetooth(GFSK) | Antenna | Right Edge    | 5             | 00      | 2402        | 9.50   | 8.93                      | 1.30               | 113.92%       | 0.062                       | 0.091    | -   |
| Bluetooth(GFSK) | Antenna | Left Edge     | 5             | 00      | 2402        | 9.50   | 8.93                      | 1.30               | 113.92%       | 0.086                       | 0.127    | -   |

#### Note:

Reported SAR = measured SAR \* Power scaling \* Duty cycle scaling

### 7.3 Reporting statements of conformity

The conformity statement in this report is based solely on the test results, measurement uncertainty is excluded.

### 7.4 Conclusion

The device is compliant because all the standalone results are less than their corresponding criteria.

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## 8 INSTRUMENTS LIST

| Equipment List |                              |                              |               |                          |                          |
|----------------|------------------------------|------------------------------|---------------|--------------------------|--------------------------|
| Manufacturer   | Device                       | Type                         | Serial number | Date of last calibration | Date of next calibration |
| SPEAG          | Data acquisition Electronics | DAE4                         | 1665          | Feb/15/2024              | Feb/14/2025              |
| SPEAG          | Dosimetric E-Field Probe     | EX3DV4                       | 7686          | Oct/07/2024              | Oct/06/2025              |
| SPEAG          | System Validation Dipole     | D2450V2                      | 727           | Apr/22/2024              | Apr/21/2025              |
| SPEAG          | Dielectric Assessment Kit    | DAKS-3.5                     | 1053          | Feb/21/2024              | Feb/20/2025              |
| Keysight       | EXA Signal Analyzer          | N9010B                       | MY63440390    | Feb/16/2024              | Feb/15/2025              |
| R&S            | MXG Analog Signal Generator  | SMB100A03                    | 182012        | May/21/2024              | May/20/2025              |
| Agilent        | Dual-directional coupler     | 772D                         | MY52180142    | Oct/30/2024              | Oct/29/2025              |
| Agilent        | Dual-directional coupler     | 778D                         | MY52180302    | Nov/06/2024              | Nov/05/2025              |
| EMCI           | Amplifier                    | ZHL-42                       | 980189        | Calibration not required | Calibration not required |
| EMCI           | Amplifier                    | ZVE-8G                       | 980190        | Calibration not required | Calibration not required |
| R&S            | Power Sensor                 | NRP18S                       | 101973        | Feb/27/2024              | Feb/26/2025              |
| R&S            | Power Meter                  | NRX                          | 102191        | Feb/27/2024              | Feb/26/2025              |
| R&S            | Power Sensor                 | NRP18S                       | 109065        | Aug/28/2024              | Aug/27/2025              |
| SPEAG          | Software                     | DASY 52<br>V52.10.4.152<br>7 | N/A           | Calibration not required | Calibration not required |
| SPEAG          | Phantom                      | ELI                          | N/A           | Calibration not required | Calibration not required |
| LKM            | Digital thermometer          | DTM3000                      | 3896          | Dec/26/2023              | Dec/25/2024              |
| TECPEL         | Digital thermometer          | DTM-303A                     | TP131515      | May/23/2024              | May/22/2025              |

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## 9 UNCERTAINTY BUDGET

Measurement Uncertainty evaluation template for DUT SAR test (0.3-3G)

| A   | c                         | D                          | e          |           | f       | g        | $h=c * f / e$           | $i=c * g / e$           | k           |
|---|---------------------------|----------------------------|------------|-----------|---------|----------|-------------------------|-------------------------|-------------|
| Source of Uncertainty                                       | Tolerance/<br>Uncertainty | Probability<br>Distributio | Div        | Div Value | ci (1g) | ci (10g) | Standard<br>uncertainty | Standard<br>uncertainty | vi, or Veff |
| <b>Measurement system</b>                                   |                           |                            |            |           |         |          |                         |                         |             |
| Probe calibration   | 6.00%                     | N                          | 1          | 1         | 1       | 1        | 6.00%                   | 6.00%                   | ∞           |
| <i>Isotropy, Axial</i>                                      | 3.50%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 2.02%                   | 2.02%                   | ∞           |
| <i>Isotropy, Hemispherical</i>                              | 9.60%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 5.54%                   | 5.54%                   | ∞           |
| Modulation Response   | 2.40%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.40%                   | 1.40%                   | ∞           |
| Boundary Effect   | 1.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.58%                   | 0.58%                   | ∞           |
| Linearity   | 4.70%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 2.71%                   | 2.71%                   | ∞           |
| Detection Limits  | 1.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.58%                   | 0.58%                   | ∞           |
| Readout Electronics   | 0.30%                     | N                          | 1          | 1         | 1       | 1        | 0.30%                   | 0.30%                   | ∞           |
| Response time   | 0.80%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.46%                   | 0.46%                   | ∞           |
| Integration Time  | 2.60%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.50%                   | 1.50%                   | ∞           |
| <b>Measurement drift<br/>(class A evaluation)</b>           | 1.75%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.01%                   | 1.01%                   | ∞           |
| RF ambient condition -<br>noise                             | 3.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.73%                   | 1.73%                   | ∞           |
| RF ambient conditions -<br>reflections                      | 3.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.73%                   | 1.73%                   | ∞           |
| Probe positioner<br>Mechanical restrictions                 | 0.40%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.23%                   | 0.23%                   | ∞           |
| Probe Positioning with<br>respect to phantom shell          | 2.90%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 1.67%                   | 1.67%                   | ∞           |
| Post-processing   | 1.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.58%                   | 0.58%                   | ∞           |
| Max SAR Eval  | 1.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 0.58%                   | 0.58%                   | ∞           |
| <b>Test Sample related</b>                                  |                           |                            |            |           |         |          |                         |                         |             |
| Test sample positioning                                     | 2.90%                     | N                          | 1          | 1         | 1       | 1        | 2.90%                   | 2.90%                   | M-1         |
| Device Holder Uncertainty                                   | 3.60%                     | N                          | 1          | 1         | 1       | 1        | 3.60%                   | 3.60%                   | M-1         |
| Drift of output power                                       | 5.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 2.89%                   | 2.89%                   | ∞           |
| <b>Phantom and Setup</b>                                    |                           |                            |            |           |         |          |                         |                         |             |
| Phantom Uncertainty   | 4.00%                     | R                          | $\sqrt{3}$ | 1.732     | 1       | 1        | 2.31%                   | 2.31%                   | ∞           |
| Liquid permittivity (mea.)                                  | 2.55%                     | N                          | 1          | 1         | 0.64    | 0.43     | 1.63%                   | 1.10%                   | M           |
| Liquid Conductivity (mea.)                                  | 4.56%                     | N                          | 1          | 1         | 0.6     | 0.49     | 2.74%                   | 2.23%                   | M           |
| Liquid conductivity $\sigma$ —<br>temperature uncertainty   | 2.60%                     | R                          | $\sqrt{3}$ | 1.732     | 0.78    | 0.71     | 1.17%                   | 1.07%                   | ∞           |
| Liquid permittivity $\epsilon$ —<br>temperature uncertainty | 1.80%                     | R                          | $\sqrt{3}$ | 1.732     | 0.23    | 0.26     | 0.24%                   | 0.27%                   | ∞           |
| Combined standard<br>uncertainty                            |                           | RSS                        |            |           |         |          | 11.85%                  | 11.68%                  |             |
| Expan uncertainty (95%<br>confidence interval), K=2         |                           |                            |            |           |         |          | 23.71%                  | 23.35%                  |             |

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## 10 SAR MEASUREMENT RESULTS

Date: 2024/11/19

ID: 001

Report No. :TESA2410000640ES

Bluetooth(GFSK)\_Body\_Front Surface\_CH 00\_5mm

Communication System: Bluetooth; Frequency: 2402 MHz; Duty Cycle: 1:1.295

Medium parameters used:  $f = 2402$  MHz;  $\sigma = 1.833$  S/m;  $\epsilon_r = 40.283$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient temperature: 22.4°C; Liquid temperature: 22.2°C

DASY5 Configuration:

- Probe: EX3DV4 - SN7686; ConvF(7.73, 7.08, 7.39) @ 2402 MHz; Calibrated: 2024/10/07
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1665; Calibrated: 2024/02/15
- Phantom: ELI
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**Area Scan (51x61x1):** Interpolated grid: dx=12 mm, dy=12 mm

Maximum value of SAR (interpolated) = 0.188 W/kg

**Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 9.572 V/m; Power Drift = 0.02 dB

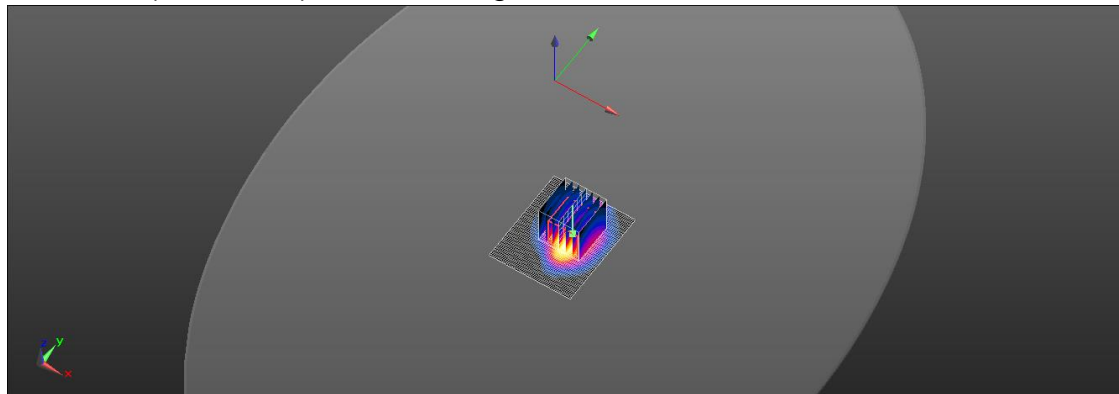
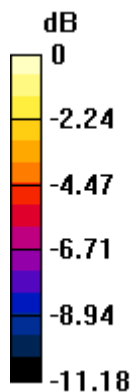
Peak SAR (extrapolated) = 0.199 W/kg

**SAR(1 g) = 0.121 W/kg; SAR(10 g) = 0.065 W/kg**

Smallest distance from peaks to all points 3 dB below = 10 mm

Ratio of SAR at M2 to SAR at M1 = 63.1%

Maximum value of SAR (measured) = 0.166 W/kg



0 dB = 0.166 W/kg = -7.80 dBW/kg

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## 11 SAR SYSTEM CHECK RESULTS

Date: 2024/11/19

Report No.: TESA2410000640ES

Dipole 2450 MHz\_SN:727

Communication System: CW; Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used:  $f = 2450$  MHz;  $\sigma = 1.882$  S/m;  $\epsilon_r = 40.201$ ;  $\rho = 1090$  kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient temperature: 22.4°C; Liquid temperature: 22.2°C

DASY5 Configuration:

- Probe: EX3DV4 - SN7686; ConvF(7.73, 7.08, 7.39) @ 2450 MHz; Calibrated: 2024/10/07
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1665; Calibrated: 2024/02/15
- Phantom: ELI
- DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)

**Area Scan (71x91x1):** Interpolated grid: dx=12 mm, dy=12 mm

Maximum value of SAR (interpolated) = 17.5 W/kg

**Zoom Scan (7x7x7)/Cube 0:** Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 99.11 V/m; Power Drift = 0.02 dB

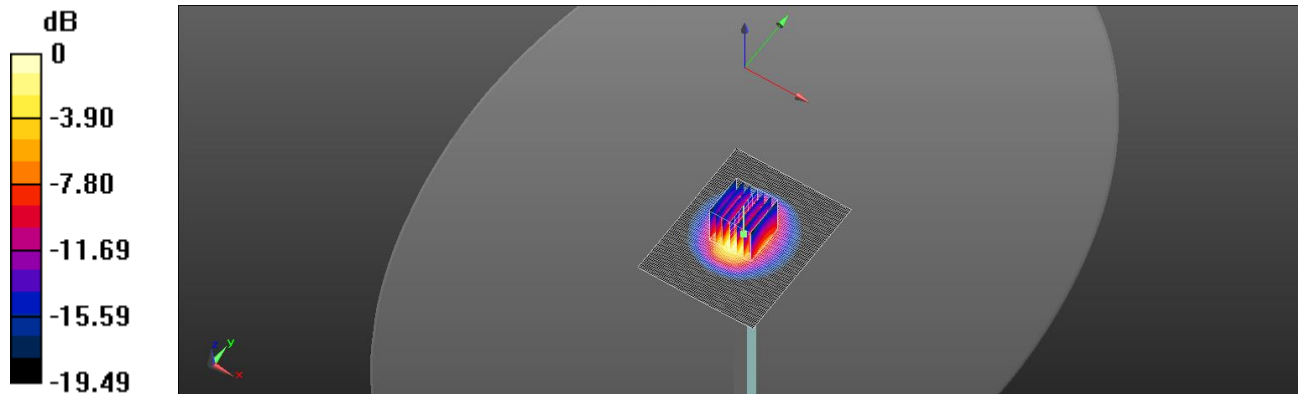
Peak SAR (extrapolated) = 21.5 W/kg

**SAR(1 g) = 12.4 W/kg; SAR(10 g) = 5.99 W/kg**

Smallest distance from peaks to all points 3 dB below = 9.6 mm

Ratio of SAR at M2 to SAR at M1 = 53.5%

Maximum value of SAR (measured) = 17.1 W/kg



0 dB = 17.1 W/kg = 12.76 dBW/kg

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**Refer to separated files for the following appendixes.**

**12.1 SAR\_Appendix A Photographs**

**12.2 SAR\_Appendix B DAE & Probe Cal. Certificate**

**12.3 SAR\_Appendix C Phantom Description & Dipole Cal. Certificate**

**- End of report -**

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