



SAR EVALUATION REPORT

FCC 47 CFR § 2.1093

IEEE Std. 1528-2013

For

AXIS W110 BODY WORN CAMERA

FCC ID: PNB-AXISW110

FCC MODEL NUMBER: AXIS W110 BODY WORN CAMERA BLACK

FCC ADDITIONAL MODEL NUMBER: AXIS W110 BODY WORN CAMERA GRAY, AXIS W110 BODY WORN CAMERA, W110

Report Number: 4790752664-SAR-1

Issue Date: May 23, 2023

Prepared for

**AXIS COMMUNICATIONS AB
GRANDEN 1 SE-223 69 LUND SWEDEN**

Prepared by

**UL Verification Services (Guangzhou) Co., Ltd, Song Shan Lake Branch
Building 10, Innovation Technology Park, No. 1, Li Bin Road, Song Shan Lake Hi-Tech
Development Zone Dongguan, People's Republic of China**

Tel: +86 769 22038881

Fax: +86 769 33244054

Website: www.ul.com



Revision History

Rev.	Date	Revisions	Revised By
V1.0	May 23, 2023	Initial Issue	\

Note:

1. The Measurement result for the sample received is<Pass> according to < < IEEE Std. 1528> when <Accuracy Method> decision rule is applied.
2. This report is only published to and used by the applicant, and it is not for evidence purpose in China.



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1. Attestation of Test Results

Applicant Name	AXIS COMMUNICATIONS AB		
Address	GRANDEN 1 SE-223 69 LUND SWEDEN		
Manufacturer	AXIS COMMUNICATIONS AB		
Address	GRANDEN 1 SE-223 69 LUND SWEDEN		
EUT Name	AXIS W110 BODY WORN CAMERA		
Model	AXIS W110 BODY WORN CAMERA BLACK		
Additional Model Number	AXIS W110 BODY WORN CAMERA GRAY, W110, AXIS W110 BODY WORN CAMERA		
Sample Status	Normal		
Sample Received Date	May 4, 2023		
Date of Tested	May 10 ~ May 16, 2023		
Applicable Standards	FCC 47 CFR § 2.1093 IEEE Std. 1528-2013 KDB publication		
SAR Limits (W/Kg)			
Exposure Category	Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)	
General population / Uncontrolled exposure	1.6	4	
The Highest Reported SAR (W/kg)			
RF Exposure Conditions	Equipment Class		
	DSS	DTS	U-NII
Body (1-g)	/	0.676	0.827
Simultaneous Transmission (1-g)	/		
Test Results	Pass		
Prepared By: <i>Burt Hu</i> Burt Hu Laboratory Engineer	Reviewed By: <i>Denny Huang</i> Denny Huang Senior Project Engineer	Approved By: <i>Stephen Guo</i> Stephen Guo Laboratory Manager	



2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with IEEE Std.1528-2013, the following FCC Published RF exposure KDB procedures:

- 248227 D01 802.11 Wi-Fi SAR
- 447498 D01 General RF Exposure Guidance
- 690783 D01 SAR Listings on Grants
- 865664 D01 SAR measurement 100 MHz to 6 GHz
- 865664 D02 RF Exposure Reporting



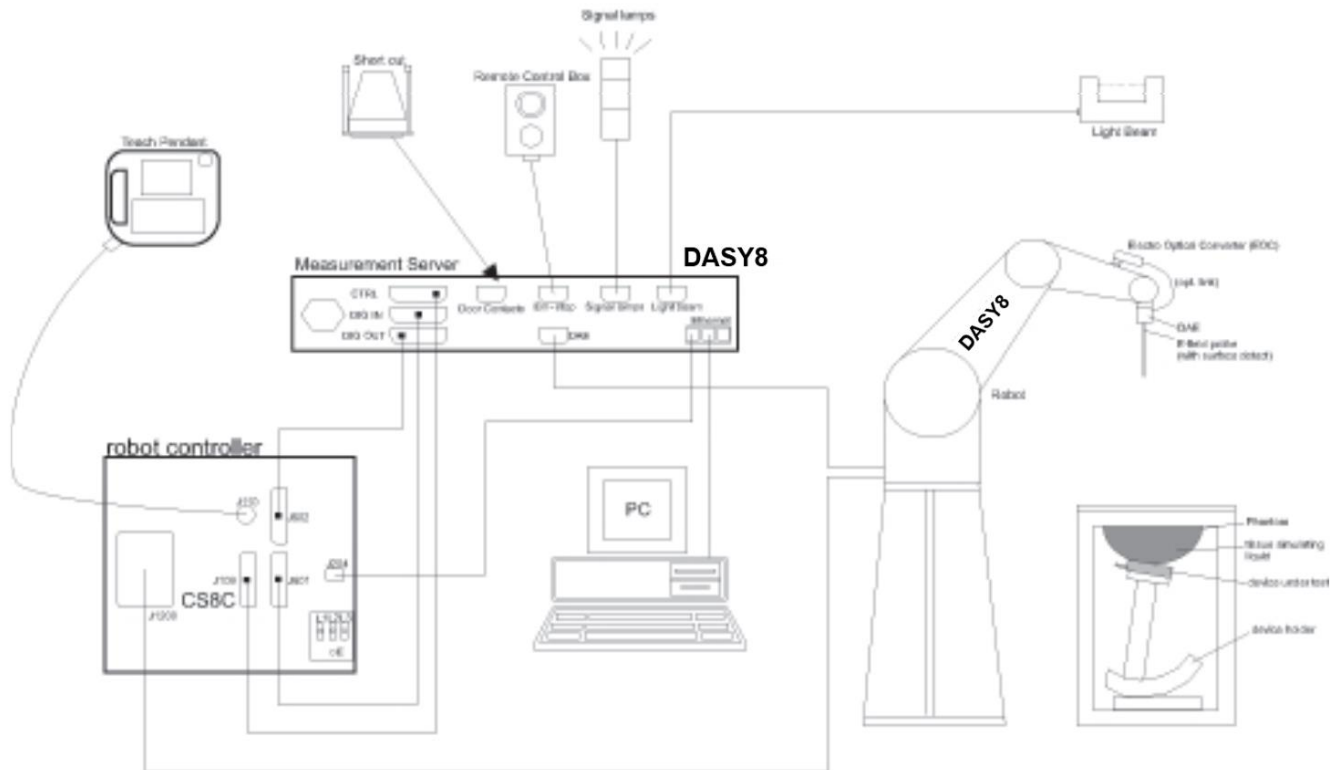
3. Facilities and Accreditation

Test Location	UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch.
Address	Building 10, Innovation Technology Park, Song Shan Lake Hi-tech Development Zone, Dongguan, 523808, China
Accreditation Certificate	<p>A2LA (Certificate No.: 4102.01) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with A2LA.</p> <p>FCC (FCC Recognized No.: CN1187) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been recognized to perform compliance testing on equipment subject to the Commission's Declaration of Conformity (DoC) and Certification rules</p> <p>ISED (Company No.: 21320) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. has been registered and fully described in a report filed with ISED. The Company Number is 21320 and the test lab Conformity Assessment Body Identifier (CABID) is CN0046.</p> <p>VCCI (Registration No.: G-20019, R-20004, C-20012 and T-20011) UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch has been assessed and proved to be in compliance with VCCI, the Membership No. is 3793. Facility Name: Chamber D, the VCCI registration No. is G-20019 and R-20004 Shielding Room B, the VCCI registration No. is C-20012 and T-20011</p>
Description	All measurement facilities use to collect the measurement data are located at Building 10, Innovation Technology Park, Song Shan Lake Hi tech Development Zone, Dongguan, 523808, China

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

The DASY8 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 Win10 and the DASY8 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 v01r04 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 mm \pm 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm \pm 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° \pm 1°	20° \pm 1°
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 v01r04 SAR Measurement 100 MHz to 6 GHz

Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			$\leq 2 \text{ GHz}: \leq 8 \text{ mm}$ $2 - 3 \text{ GHz}: \leq 5 \text{ mm}^*$	$3 - 4 \text{ GHz}: \leq 5 \text{ mm}^*$ $4 - 6 \text{ GHz}: \leq 4 \text{ mm}^*$
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 4 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 3 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
	graded grid	$\Delta z_{\text{Zoom}}(1)$: between 1 st two points closest to phantom surface	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz}: \leq 3 \text{ mm}$ $4 - 5 \text{ GHz}: \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz}: \leq 2 \text{ mm}$
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1) \text{ mm}$	
Minimum zoom scan volume	x, y, z		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz}: \geq 28 \text{ mm}$ $4 - 5 \text{ GHz}: \geq 25 \text{ mm}$ $5 - 6 \text{ GHz}: \geq 22 \text{ mm}$

Step 4: Power 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 greater 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.

Name of equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
ENA Network Analyzer	Keysight	E5080A	MY55100583	2023.10.16
Dielectric Probe kit	SPEAG	SM DAK 040 SA	1155	2025.02.27
DC power supply	Keysight	E36103A	MY55350020	2023.10.16
Signal Generator	Rohde & Schwarz	SME06	837633\001	2023.08.14
BI-Directional Coupler	KRYTAR	1850	54733	2023.10.16
Peak and Average Power Sensor	Keysight	E9325A	MY62220002	2023.10.25
Peak and Average Power Sensor	Keysight	E9325A	MY62220003	2023.10.25
Dual Channel PK Power Meter	Keysight	N1912A	MY55416024	2023.10.16
Amplifier	CORAD TECHNOLOGY LTD	AMF-4D-00400600-50-30P	1983561	NCR
Dosimetric E-Field Probe	SPEAG	EX3DV4	7733	2023.08.01
Data Acquisition Electronic	SPEAG	DAE4	1739	2023.07.28
Dipole Kit 2450 MHz	SPEAG	D2450V2	977	2024.12.16
Dipole Kit 5 GHz	SPEAG	D5GHzV2	1231	2024.12.15
Software	SPEAG	DASY8	N/A	NCR
ELI Phantom	SPEAG	ELI V8.0	2178	NCR
Thermometer	/	GX-138	150709653	2023.10.21
Thermometer	VICTOR	ITHX-SD-5	18470005	2023.10.21

Note:

- 1) As per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
 - a) There is no physical damage on the dipole;
 - b) System check with specific dipole is within 10% of calibrated value;
 - c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement.
 - d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.
- 2) Dielectric assessment kit is calibrated against air, distilled water and a shorting block performed before measuring liquid parameters.
- 3) NCR is short for "No Calibration Requirement".



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, the extensive SAR measurement uncertainty analysis described in IEEE Std. 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.



6. Device Under Test (DUT) Information

6.1. DUT Description

DUT is a portable camera with 802.11a/b/g/n/ac radio and 2.4GHz Bluetooth radio.

DUT Dimension	Overall (Length x Width x Height): 74.2mm x 54.8mm x 18.5mm
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6.2. Wireless Technology

Wireless technology	Frequency band
Bluetooth	2.4 GHz
Wi-Fi	2.4 GHz
Wi-Fi	5.2 GHz
Wi-Fi	5.8 GHz

6.3. Antenna Gain

Antenna type	Band	Gain(dBi)
FPC Antenna	2.4 GHz	1.4
FPC Antenna	5.2 GHz	0
FPC Antenna	5.8 GHz	-0.1



7. Conducted Output Power Measurement and tune-up tolerance

7.1. Power measurement result of 2.4GHz Wi-Fi.

Mode	Channel	Frequency (MHz)	Data Rate	Average Power (dBm)	Tune-up Limit (dBm)	Duty Cycle (%)
802.11b	1	2412	1Mbps	16.48	17.0	99.64
	6	2437		16.66		
	11	2462		16.35		
802.11g	1	2412	6Mbps	Not required	16.0	/
	6	2437				
	11	2462				
802.11n20	1	2412	MCS0		15.0	
	6	2437				
	11	2462				
802.11ac20	1	2412	MCS0		15.0	
	6	2437				
	11	2462				

Note:

As per KDB 447498 sec.4.1.d at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit

7.2. Power measurement result of 5GHz Wi-Fi (U-NII-1).

Mode	Channel	Frequency (MHz)	Data Rate	Average Power (dBm)	Tune-up Limit (dBm)	Duty Cycle (%)	
802.11a-20	36	5180	6Mbps	12.21	12.5	98.58	
	40	5200		12.10			
	44	5220		12.00			
	48	5240		12.01			
802.11n-HT20	36	5180	MCS0	Not required	11.5	/	
	40	5200					
	44	5220					
	48	5240					
802.11n-HT40	38	5190			10.5		
	46	5230					
802.11ac-VHT20	36	5180			11.5		
	40	5200					
	44	5220					
	48	5240					
802.11ac-VHT40	38	5190			10.5		
	46	5230					
802.11ac-VHT80	42	5210			11.0		

Note:

- As per KDB 447498 sec.4.1.d at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.



7.3. Power measurement result of 5GHz Wi-Fi (U-NII-3).

Mode	Channel	Frequency (MHz)	Data Rate	Average Power (dBm)	Tune-up Limit (dBm)	Duty Cycle (%)
802.11a-20	149	5745	6Mbps	12.46	12.5	98.58
	153	5765		12.23		
	157	5785		12.06		
	161	5805		12.11		
	165	5825		12.08		
802.11n-HT20	149	5745	MCS0	Not required	12.0	/
	153	5765				
	157	5785				
	161	5805				
	165	5825				
802.11n-HT40	151	5755			11.0	
	159	5795				
802.11ac-VHT20	149	5745			12.0	
	153	5765				
	157	5785				
	161	5805				
	165	5825				
802.11ac-VHT40	151	5755			11.0	
	159	5795				
802.11ac-VHT80	155	5775			11.5	

Note:

1. As per KDB 447498 sec.4.1.d at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.

7.4. Power measurement result of Bluetooth

Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2441MHz	2480MHz		
BT	DH5	Not Required			3.0	/
BT	2DH5	Not Required			0.5	
BT	3DH5	Not Required			0	

Type	Mode	Average Conducted Power (dBm)			Tune-up	Duty Cycle (%)
		2402MHz	2440MHz	2480MHz		
BLE	1M	Not Required			2.5	/

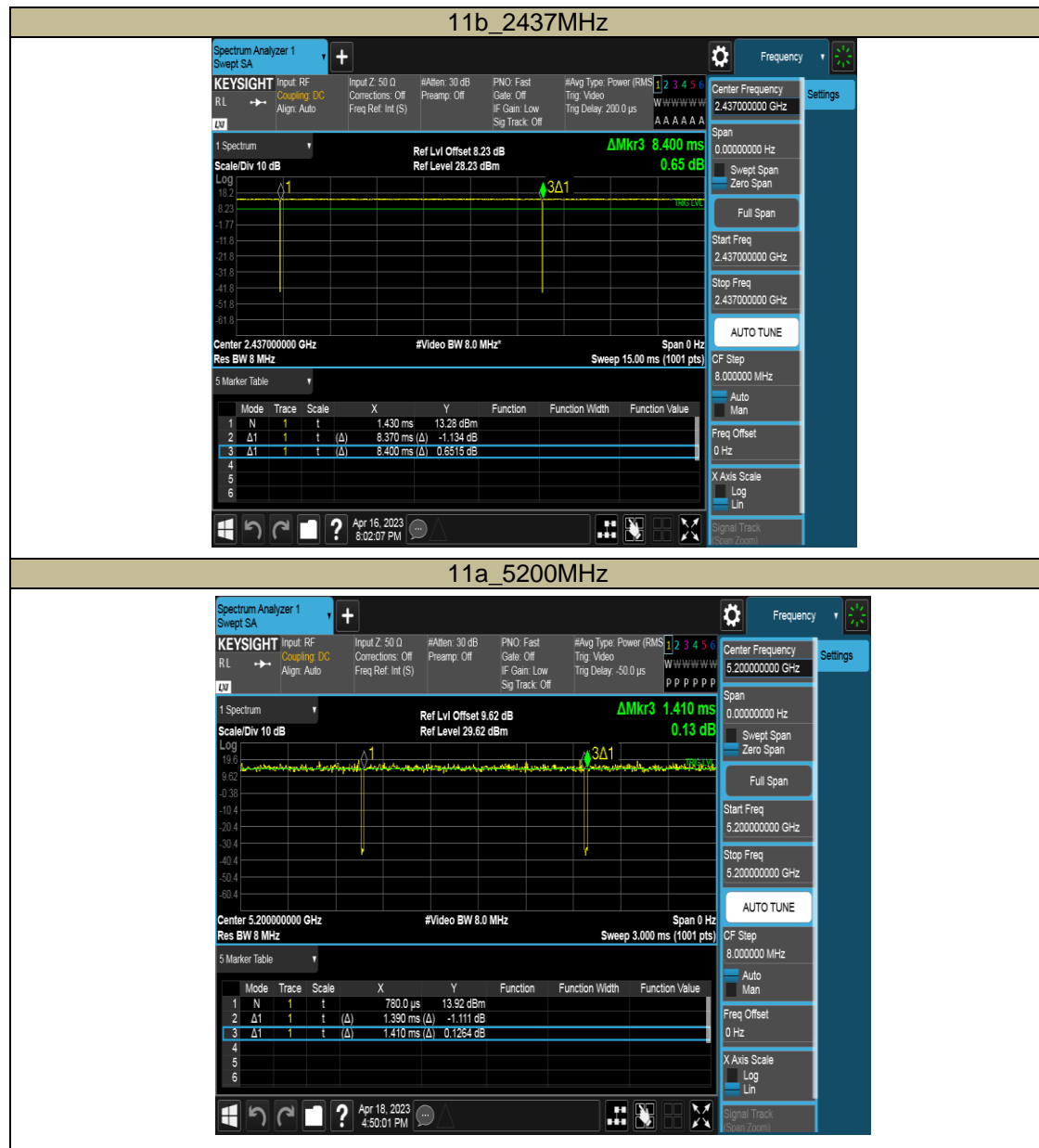
Note:

- 1) The output power of the device was set to transmit at maximum power for all tests.
- 2) As per KDB 447498 D01 sec.4.1.d) at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.



7.5. Duty Cycle

Test Mode	On Time (msec)	Period (msec)	Duty Cycle x (Linear)	Duty Cycle (%)
11b	8.37	8.40	0.9964	99.64
11a	1.39	1.41	0.9858	98.58



8. Test Configuration

8.1. Wi-Fi Test Configuration

For Wi-Fi SAR testing, a communication link is set up with the testing software for Wi-Fi mode test. During the test, at each test frequency channel, the EUT is operated at the RF continuous emission mode. The test procedures in KDB 248227D01 are applied.

8.1.1. Initial Test Position Procedure

For exposure condition with multiple test position, such as handsets 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 position 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 $\leq 0.4\text{W/kg}$, no additional testing for the remaining test position is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR position until the reported SAR result is $\leq 0.8\text{W/kg}$ or all test position are measured. For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is $> 0.8\text{ W/kg}$, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is $\leq 1.2\text{ W/kg}$ or all required channels are tested.

8.1.2. Initial Test Configuration Procedure

An initial test configuration is determined for OFDM transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. For configurations with the same specified or measured maximum output power, additional transmission mode and test channel selection procedures are required (see section 5.3.2 of KDB 248227D01). SAR test reduction of subsequent highest output test channels is based on the reported SAR of the initial test configuration.

For next to the ear, hotspot mode and UMC mini-tablet exposure configurations where multiple test positions are required, the initial test position procedure is applied to minimize the number of test positions required for SAR measurement using the initial test configuration transmission mode. For fixed exposure conditions that do not have multiple SAR test positions, SAR is measured in the transmission mode determined by the initial test configuration. When the reported SAR of the initial test configuration is $> 0.8\text{ W/kg}$, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until the reported SAR is $\leq 1.2\text{ W/kg}$ or all required channels are tested.

8.1.3. Sub Test Configuration Procedure

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units.

When the highest reported SAR for the initial test configuration, according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is $\leq 1.2\text{ W/kg}$, SAR is not required for that subsequent test configuration.

8.1.4. 2.4GHz Wi-Fi SAR Test Procedures

Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band to simplify DSSS test requirements. For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions.



A) 802.11b DSSS SAR Test Requirements

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

- 1) When the reported SAR of the highest measured maximum output power channel (section 3.1 of KDB 248227D01) for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- 2) When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.

B) 2.4GHz 802.11g/n OFDM SAR Test Exclusion Requirements

When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied (section 5.3 of KDB 248227D01). SAR is not required for the following 2.4 GHz OFDM conditions.

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

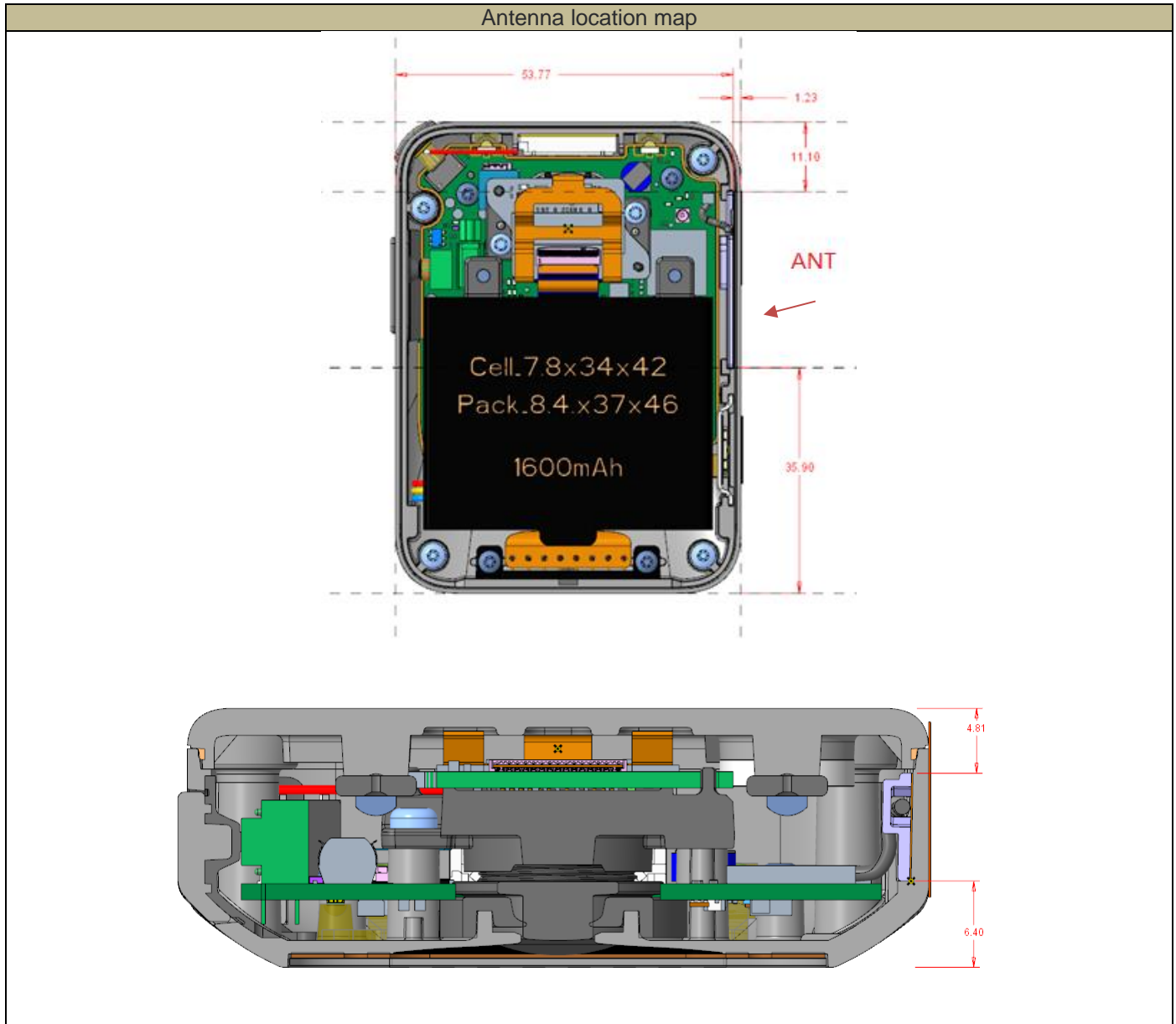
C) SAR Test Requirements for OFDM configurations

When SAR measurement is required for 802.11 g/n OFDM configurations, each standalone and frequency aggregated band is considered separately for SAR test reduction. In applying the initial test configuration and subsequent test configuration procedures, the 802.11 transmission configuration with the highest specified maximum output power and the channel within a test configuration with the highest measured maximum output power should be clearly distinguished to apply the procedures.

9. RF Exposure Conditions

9.1. Antenna location map

Refer to the diagram inside the device which attached below for the specific details of the antenna-to-edges distances. As per KDB 941225 D06, when the antenna to-edge-distance is greater than 2.5 cm, SAR evaluation is not required for the corresponding position.



Ant	Test Position	antenna to-edge-distance	Test required
	Front Surface	<25mm	Yes
	Back Surface	<25mm	Yes
	Left Edge	<25mm	Yes
	Right Edge	>25mm	No
	Top Edge	<25mm	Yes
	Bottom Edge	>25mm	No



9.2. Evaluation

For 2.4GHz Wi-Fi 1-g SAR

Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Calculation Result	Threshold	SAR Test
2462	17.00	50.12	5.00	15.7	3.0	Required

For 5.2GHz Wi-Fi 1-g SAR

Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Calculation Result	Threshold	SAR Test
5200	12.50	17.78	5.00	8.1	3.0	Required

For 5.8GHz Wi-Fi 1-g SAR

Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Calculation Result	Threshold	SAR Test
5825	12.50	17.78	5.00	8.6	3.0	Required

For 2.4GHz BT 1-g SAR

Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Calculation Result	Threshold	SAR Test
2480	3.00	2.00	5.00	0.6	3.0	Excluded



10. SAR Test Configuration

EUT is a portable camera and can carry accessories, which may be very close to the human body when used, so 1g body SAR (5mm) evaluation is considered.



11. Dielectric Property Measurements & System Check

11.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within $\pm 2^\circ\text{C}$ 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.

Tissue Dielectric Parameters

FCC KDB 865664 D01 v01r04 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:

Liquid	Freq.	Liquid Parameters				Deviation(%)		Limit (%)	Temp. (°C)	Test Date
		Measured		Target						
		ϵ _r	σ	ϵ _r	σ	ϵ _r	σ			
Head 2450	2360	40.30	1.73	39.36	1.72	2.39	0.58	±5	21.9	2023.5.9
	2450	40.20	1.84	39.20	1.80	2.55	2.22			
	2540	39.70	1.95	39.09	1.90	1.56	2.63			
Head 5250	5160	34.70	4.44	36.03	4.61	-3.69	-3.69	±5	22.1	2023.5.16
	5250	34.60	4.53	35.93	4.71	-3.70	-3.82			
	5340	34.50	4.61	35.83	4.80	-3.71	-3.96			
Head 5250	5660	35.40	4.99	35.46	5.13	-0.17	-2.73	±5	21.6	2023.5.10
	5750	35.30	5.05	35.36	5.22	-0.17	-3.26			
	5840	35.20	5.16	35.27	5.30	-0.20	-2.64			



11.2. 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 \pm 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 \geq 15.0 cm for SAR measurements \leq 3 GHz and \geq 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 10mm (above 1GHz) and 15mm (below 1GHz) from dipole center to the simulating liquid surface.
- For area scan, standard grid spacing for head measurements is 15 mm in x- and y- dimension (\leq 2GHz), 12 mm in x- and y-dimension (2-4 GHz) and 10mm in x- and y- dimension (4-6GHz).
- For zoom scan, ΔX_{zoom} , $\Delta Y_{\text{zoom}} \leq$ 2GHz - \leq 8mm, 2-4GHz - \leq 5 mm and 4-6 GHz - \leq 4 mm; $\Delta Z_{\text{zoom}} \leq$ 3GHz - \leq 5 mm, 3-4 GHz - \leq 4 mm and 4-6 GHz - \leq 2 mm.
- Distance between probe sensors and phantom surface was set to 3 mm except for 5 GHz band. For 5GHz band, Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was set to 100 mW or 250 mW depend on the certificate of the dipoles.
- 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.

T.S. Liquid		Measured Results		Target (Ref. value)	Delta (%)	Limit (%)	Temp. (°C)	Test Date
		Zoom Scan (W/Kg)	Normalize to 1W (W/Kg)					
Head 2450	1-g	14.100	56.40	53.20	6.02	\pm 10	21.6	2023.5.10
	10-g	6.620	26.48	24.20	9.42			
Head 5250	1-g	8.010	80.10	77.90	2.82	\pm 10	22.1	2023.5.16
	10-g	2.340	23.40	22.60	3.54			
Head 5750	1-g	7.650	76.50	78.30	-2.30	\pm 10	21.6	2023.5.10
	10-g	2.220	22.20	22.40	-0.89			



12. Measured and Reported (Scaled) SAR Results

As per KDB 447498 D01 v06 sec.4.1.e), When SAR or MPE is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported.

Scaled SAR calculation formula:

Scaled SAR = Tune-up in mW / Conducted power in mW * Duty cycle (if available) * SAR value

SAR Test Reduction criteria are as follows:

KDB 447498 D01 v06 General RF Exposure Guidance:

A) Per KDB447498 D01 v06, all SAR measurement results are scaled to the maximum tune-up tolerance limit to demonstrate SAR compliance.

B) 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.

Per KDB865664 D01 v01r04:

For each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/Kg; if the deviation among the repeated measurement is $\leq 20\%$, and the measured SAR < 1.45 W/Kg, only one repeated measurement is required.

When the highest reported SAR for the initial test configuration, according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.



13. Measured SAR Results

13.1. 2.4GHz Wi-Fi DTS Band

Test Position (Body 5mm)	Test Mode	Frequency	Power (dBm)		SAR Value	Power Drift	Duty Factor (%)	Scaled (W/Kg)
			Tune-up	Meas.	1-g (W/kg)			
Front surface	11b	2437	17.0	16.66	0.513	0.01	99.64	0.557
Back surface	11b	2437	17.0	16.66	0.366	-0.05	99.64	0.397
Left Edge	11b	2437	17.0	16.66	0.580	-0.04	99.64	0.629
Top Edge	11b	2437	17.0	16.66	0.508	0.06	99.64	0.551
Left Edge	11b	2412	17.0	16.48	0.559	0.03	99.64	0.632
Left Edge	11b	2462	17.0	16.35	0.580	0.01	99.64	0.676
Parts								
Left Edge	11b	2462	17.0	16.35	0.440	-0.02	99.64	0.513

Note:

The SAR testing was set to transmit at maximum power for all tests.

OFDM mode SAR evaluation exclusion analysis

Mode	Tune-up (dBm)	Tune-up (mW)	Highest Reported SAR (W/Kg)	Adjusted SAR (W/Kg)	SAR Test
802.11b	17	50.12	0.676	\	\
802.11g	16	39.81	\	0.537	Excluded
802.11n20	15	31.62	\	0.427	Excluded
802.11ac20	15	31.62	\	0.427	Excluded

Note:

- 1) The highest reported SAR for DSSS adjusted by the ratio of OFDM 802.11g/n/ac to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, so SAR evaluation for 802.11g/n/ac is not required.



13.2. SAR Test Results of 5GHz Wi-Fi (U-NII-1)

Test Position (Body 5mm)	Test Mode	Frequency	Power (dBm)		SAR Value	Power Drift	Duty Factor (%)	Scaled (W/Kg)
			Tune-up	Meas.	1-g (W/kg)			
Front surface	11A	5180	12.5	12.21	0.197	-0.06	98.58	0.214
Back surface	11A	5180	12.5	12.21	0.201	-0.02	98.58	0.218
Left Edge	11A	5180	12.5	12.21	0.763	-0.11	98.58	0.827
Top Edge	11A	5180	12.5	12.21	0.189	-0.09	98.58	0.205
Left Edge	11A	5200	12.5	12.10	0.680	0.00	98.58	0.756
Left Edge	11A	5240	12.5	12.01	0.555	-0.02	98.58	0.630
Parts								
Left Edge	11A	5180	12.5	12.21	0.633	-0.06	98.58	0.686

Note:

The SAR testing was set to transmit at maximum power for all tests.

Subsequent test configuration SAR evaluation exclusion analysis for U-NII-I band

Mode	Tune-up (dBm)	Tune-up (mW)	Highest Reported SAR (W/Kg)	Adjusted SAR (W/Kg)	SAR Test
802.11a	12.5	17.78	0.827	\	\
802.11n 20M	11.5	14.13	\	0.657	Excluded
802.11n 40M	10.5	11.22	\	0.522	Excluded
802.11ac 20M	11.5	14.13	\	0.657	Excluded
802.11ac 40M	11.5	14.13	\	0.657	Excluded
802.11ac 80M	11	12.59	\	0.585	Excluded

Note:

- 1) The 802.11a mode is selected as Initial Test Configuration for SAR test according to the specified maximum output power. As the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR test for the other 802.11 modes is not required.

13.3. SAR Test Results of 5GHz Wi-Fi (U-NII-3)

Test Position (Body 5mm)	Test Mode	Frequency	Power (dBm)		SAR Value	Power Drift	Duty Factor (%)	Scaled (W/Kg)
			Tune-up	Meas.	1-g (W/kg)			
Front surface	11A	5745	12.5	12.46	0.109	0.03	98.58	0.112
Back surface	11A	5745	12.5	12.46	0.159	-0.06	98.58	0.163
Left Edge	11A	5745	12.5	12.46	0.302	-0.04	98.58	0.309
Top Edge	11A	5745	12.5	12.46	0.084	0.01	98.58	0.086
Left Edge	11A	5785	12.5	12.23	0.298	-0.02	98.58	0.322
Left Edge	11A	5825	12.5	12.08	0.298	-0.19	98.58	0.333
Parts								
Left Edge	11A	5745	12.5	12.46	0.296	-0.04	98.58	0.303



Note:

The SAR testing was set to transmit at maximum power for all tests.

Subsequent test configuration SAR evaluation exclusion analysis for U-NII-3 band

Mode	Tune-up (dBm)	Tune-up (mW)	Highest Reported SAR (W/Kg)	Adjusted SAR (W/Kg)	SAR Test
802.11a	12.5	17.78	0.333	\	\
802.11n 20M	12	15.85	\	0.297	Excluded
802.11n 40M	11	12.59	\	0.236	Excluded
802.11ac 20M	12	15.85	\	0.297	Excluded
802.11ac 40M	11	12.59	\	0.236	Excluded
802.11ac 80M	11.5	14.13	\	0.265	Excluded

Note:

- 2) The 802.11a mode is selected as Initial Test Configuration for SAR test according to the specified maximum output power. As the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR test for the other 802.11 modes is not required.



14. Simultaneous Transmission SAR Analysis

Per KDB 447498D01, SAR compliance for simultaneous transmission must be configured when the maximum duration of overlapping transmissions, including network hand-offs, is greater than 30 seconds. This device could not contain multiple transmitters that may operate simultaneously, and therefore no requires a simultaneous transmission analysis.



Appendixes

Refer to separated files for the following appendixes.

4790752664-SAR-1_App A Photo

4790752664-SAR-1_App B System Check Plots

4790752664-SAR-1_App C Highest Test Plots

4790752664-SAR-1_App D Cal. Certificates

-----End of Report-----