

SAR and Power Density Test Report

Report No. : SFBGDGE-WTW-P22120075

Applicant : Qualcomm Technologies, Inc.

Address : 5775 Morehouse Drive, San Diego, CA 92121-1714

Product : Wi-Fi 6E BT 5.2 M.2 2230 Module

FCC ID : J9C-QCNFA765

Brand : Qualcomm

Model No. : QCNFA765

FCC Rule Part : CFR §2.1093

Standards : IEC/IEEE 66209-1528:2020, IEC TR 63170:2018,
KDB 865664 D01 v01r04, KDB 865664 D02 v01r02,
KDB 248227 D01 v02r02, KDB 447498 D01 v06 , KDB 616217 D04 v01r02

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CERTIFICATION: The above equipment have been tested by **Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch-Lin Kou Laboratories**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. It should not be reproduced except in full, without the written approval of our laboratory. The client should not use it to claim product certification, approval, or endorsement by TAF or any government agencies.

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Release Control Record

Report No.	Reason for Change	Date Issued
SFBDGE-WTW-P22120075	Initial release	Feb. 07, 2023

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1. Summary of Maximum SAR and Power Density Value

Equipment Class	Mode	Highest SAR _{1g} Body Tested at 0 mm (W/kg)
DTS	2.4G WLAN	0.33
NII	5.3G WLAN	0.10
	5.6G WLAN	0.06
	5.8G WLAN	0.05
	5.9G WLAN	0.04
6CD	6G WLAN	0.34
DSS	Bluetooth	0

Mode	Highest APD [W/m ²]	Highest PD (W/m ²)
WLAN 6G	2.85	5.26

Highest Simultaneous Transmission	Highest Body SAR _{1g} Tested at 0 mm (W/kg)
	0.67
	Total Exposure Ratio (TER)
	0.73

Note:

1. The SAR criteria (**Head & Body: SAR-1g 1.6 W/kg, and Extremity: SAR-10g 4.0 W/kg**) for general population/uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.
2. According to 47 CFR part 2.1093, the MPE limits specified in part 1.1310 apply to portable devices that transmit at frequencies above 6 GHz. The localized power density limit for general population exposure is **1.0 mW/cm² (equal to 10 W/m²)** for frequency up to 100 GHz.
3. Per FCC guidance in Oct 2022 TCBC workshop, the total exposure ratio calculated by taking ratio of maximum reported SAR divided by SAR limit and adding it to maximum measured power density divided by power density limit. Numerical sum of the ratios should be less than 1.
4. Per FCC interim guidance for near-field power density measurement, the power density was spatially averaged over a circular area of 4 cm².

Test Reference Guidance: IEEE C95.1:1992

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2. Description of Equipment Under Test

EUT Type	Wi-Fi 6E BT 5.2 M.2 2230 Module
FCC ID	J9C-QCNFA765
Brand Name	Qualcomm
Model Name	QCNA765
Tx Frequency Bands (Unit: MHz)	WLAN : 2412 ~ 2472, 5180 ~ 5240, 5250 ~ 5320, 5500 ~ 5720, 5745 ~ 5825, 5815 ~ 5885, 5955 ~ 6415, 6435 ~ 6545, 6555 ~ 6885, 6895 ~ 7115 Bluetooth : 2402 ~ 2480
Uplink Modulations	802.11b : DSSS 802.11a/g/n/ac: OFDM 802.11ax : OFDMA Bluetooth : GFSK, $\pi/4$ -DQPSK, 8DPSK
Maximum Tune-up Conducted Power (Unit: dBm)	Please refer to Appendix D.
Antenna Type	Refer to Note
EUT Stage	Engineering Sample

Note:

- The EUT is authorized for use in specific End-product. Please refer to below for more details.

Product	Brand	Model
Portable Computer	ALIENWARE	P124F

- The antenna information is listed as below.

WLAN/BT Antenna											
Ant. Type				Brand					Model		
PIFA				Wistron					Main: 0VCJ72 Aux: 0VCJ72		
Antenna Peak Gain (dBi)											
Ant.	BT	2.4GHz 2400-2483.5 MHz	5.2GHz 5150-5250MHz	5.3GHz 5250-5350MHz	5.6GHz 5470-5725MHz	5.8GHz 5725-5850MHz	5.9GHz 5850-5895MHz	6.2GHz 5925-6425MHz	6.5GHz 6425-6525MHz	6.7GHz 6525-6875MHz	7.0 GHz 6875-7125MHz
Main	-	1.11	2.60	2.97	3.80	3.11	3.11	1.34	0.23	0.90	2.01
Aux.	1.95	1.95	2.98	2.91	3.48	1.26	1.26	0.55	-1.91	-0.08	2.54

- The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

List of End-product Accessory:

Battery	Brand Name	DELL
	Model Name	69KF2
	Power Rating	11.4 Vdc; 86 Wh; 7167 mAh
	Type	Li-ion

3. SAR Measurement System

3.1 Definition of Specific Absorption Rate (SAR)

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

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

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

SAR measurement can be related to the electrical field in the tissue by

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

3.2 SPEAG DASY6 System

DASY6 system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY6 software defined. The DASY6 software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC.

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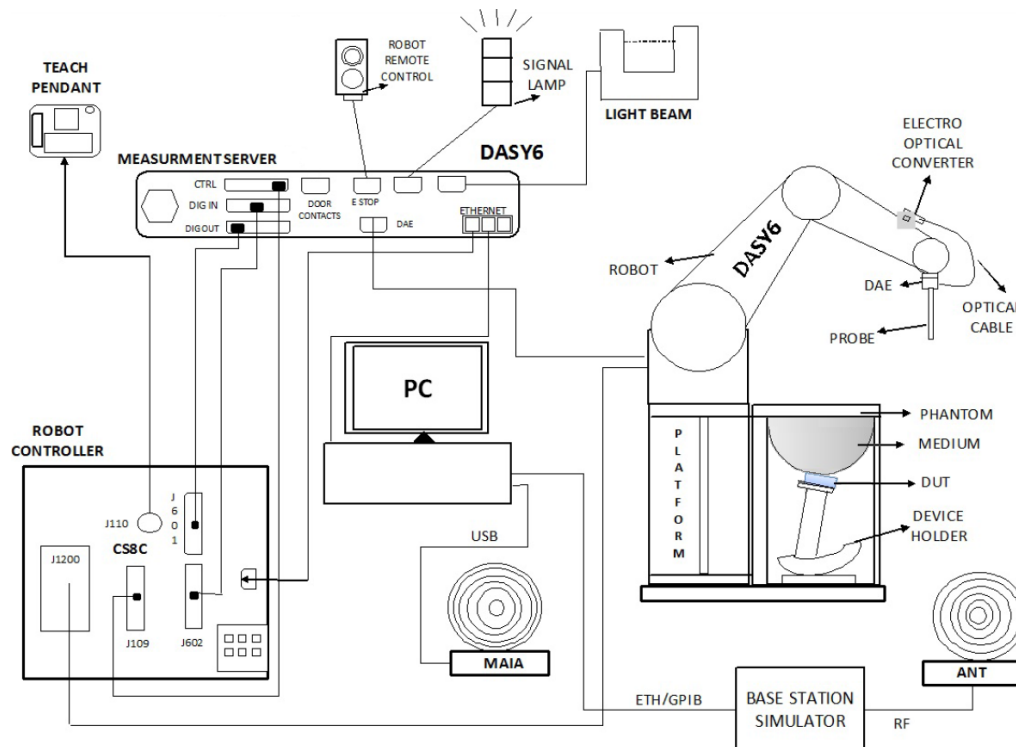


Fig-3.1 SPEAG DASY6 System Setup

3.2.1 Robot

The DASY6 system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version of CS8c from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ± 0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)



Fig-3.2 SPEAG DASY6 System

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3.2.2 Probes

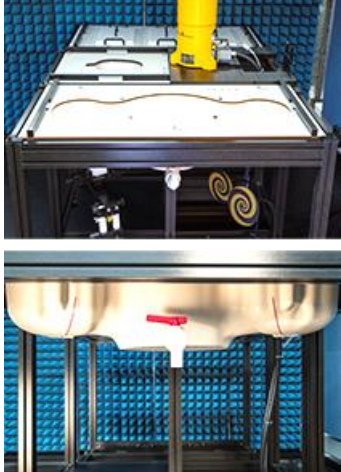
The SAR measurement is conducted with the dosimetric probe. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

Model	EX3DV4	
Construction	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	4 MHz to 10 GHz Linearity: ± 0.2 dB	
Directivity	± 0.1 dB in TSL (rotation around probe axis) ± 0.3 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μ W/g to 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μ W/g)	
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

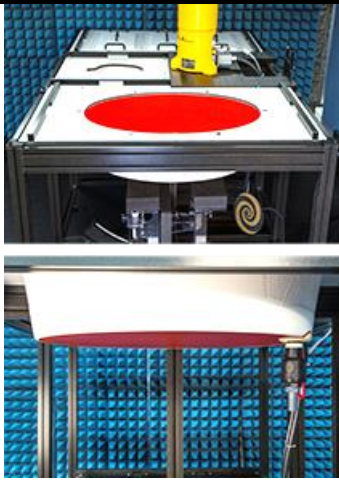
3.2.3 Data Acquisition Electronics (DAE)

Model	DAE3, DAE4	
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
Input Offset Voltage	$< 5\mu$ V (with auto zero)	
Input Bias Current	< 50 fA	
Dimensions	60 x 60 x 68 mm	

3.2.4 Phantoms

Model	SAM-Twin Phantom	
Construction	The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE Std 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body-mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.	
Material	Vinylester, fiberglass reinforced (VE-GF)	
Shell Thickness	2 $\pm$ 0.2 mm (6 $\pm$ 0.2 mm at ear point)	
Dimensions	Length: 1000 mm Width: 500 mm Height: adjustable feet	
Filling Volume	approx. 25 liters	

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Model	ELI	
Construction	The ELI phantom is used for compliance testing of handheld and body-mounted wireless devices. 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.	
Material	Vinylester, fiberglass reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	

3.2.5 Device Holder

Model	MD4HHTV5 - Mounting Device for Hand-Held Transmitters	
Construction	In combination with the Twin SAM or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
Material	Polyoxymethylene (POM)	

Model	MDA4WTV5 - Mounting Device Adaptor for Ultra Wide Transmitters	
Construction	An upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.	
Material	Polyoxymethylene (POM)	

Model	MDA4SPV6 - Mounting Device Adaptor for Smart Phones	
Construction	The solid low-density MDA4SPV6 adaptor assuring no impact on the DUT radiation performance and is conform with any DUT design and shape.	
Material	ROHACELL	

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Model	MD4LAPV5 - Mounting Device for Laptops and other Body-Worn Transmitters	
Construction	In combination with the Twin SAM or ELI phantoms, the Mounting Device (Body-Worn) enables testing of transmitter devices according to IEC 62209-2 specifications. The device holder can be locked for positioning at a flat phantom section.	
Material	Polyoxymethylene (POM), PET-G, Foam	

3.2.6 System Validation Dipoles

Model	D-Serial	
Construction	Symmetrical dipole with 1/4 balun. Enables measurement of feed point impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
Frequency	750 MHz to 5800 MHz	
Return Loss	> 20 dB	
Power Capability	> 100 W (f < 1GHz), > 40 W (f > 1GHz)	

3.2.7 Power Source

Model	Powersource1	
Signal Type	Continuous Wave	
Operating Frequencies	600 MHz to 5850 MHz	
Output Power	-5.0 dBm to +17.0 dBm	
Power Supply	5V DC, via USB jack	
Power Consumption	<3 W	
Applications	System performance check and validation with a CW signal.	

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3.2.8 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 10 % are listed in Table-3.1.

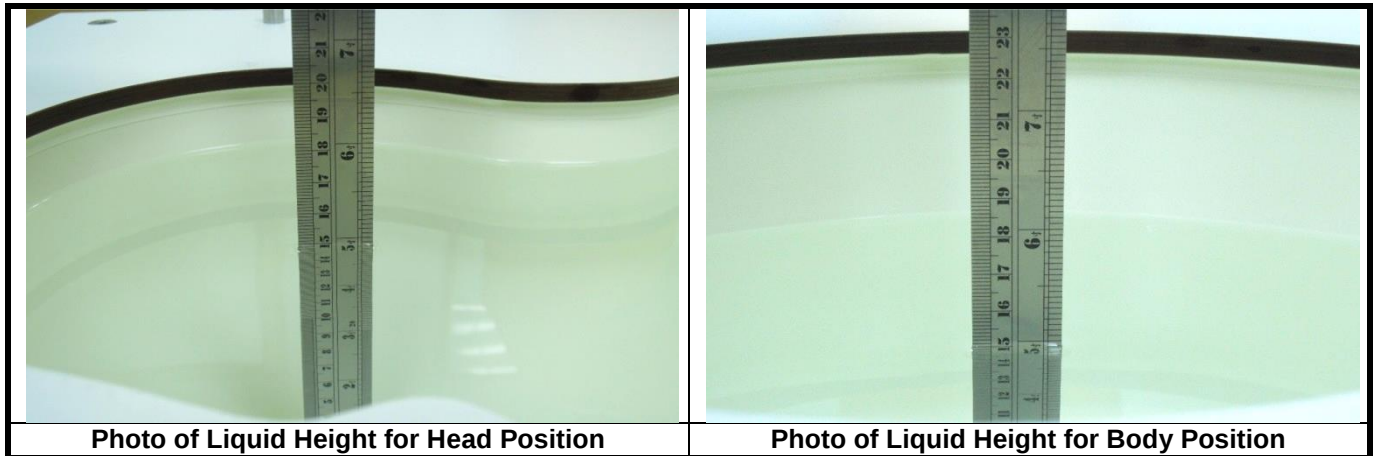


Table-3.1 Targets of Tissue Simulating Liquid

Frequency (MHz)	Target Permittivity	Range of $\pm 10\%$	Target Conductivity	Range of $\pm 10\%$
450	43.5	39.2 ~ 47.9	0.87	0.78 ~ 0.96
750	41.9	37.7 ~ 46.1	0.89	0.80 ~ 0.98
835	41.5	37.4 ~ 45.7	0.90	0.81 ~ 0.99
900	41.5	37.4 ~ 45.7	0.97	0.87 ~ 1.07
1450	40.5	36.5 ~ 44.6	1.20	1.08 ~ 1.32
1500	40.4	36.4 ~ 44.4	1.23	1.11 ~ 1.35
1640	40.2	36.2 ~ 44.2	1.31	1.18 ~ 1.44
1750	40.1	36.1 ~ 44.1	1.37	1.23 ~ 1.51
1800	40.0	36.0 ~ 44.0	1.40	1.26 ~ 1.54
1900	40.0	36.0 ~ 44.0	1.40	1.26 ~ 1.54
2000	40.0	36.0 ~ 44.0	1.40	1.26 ~ 1.54
2100	39.8	35.8 ~ 43.8	1.49	1.34 ~ 1.64
2300	39.5	35.6 ~ 43.5	1.67	1.50 ~ 1.84
2450	39.2	35.3 ~ 43.1	1.80	1.62 ~ 1.98
2600	39.0	35.1 ~ 42.9	1.96	1.76 ~ 2.16
3000	38.5	34.7 ~ 42.4	2.40	2.16 ~ 2.64
3500	37.9	34.1 ~ 41.7	2.91	2.62 ~ 3.20
4000	37.4	33.7 ~ 41.1	3.43	3.09 ~ 3.77
4500	36.8	33.1 ~ 40.5	3.94	3.55 ~ 4.33
5000	36.2	32.6 ~ 39.8	4.45	4.01 ~ 4.90
5200	36.0	32.4 ~ 39.6	4.66	4.19 ~ 5.13
5400	35.8	32.2 ~ 39.4	4.86	4.37 ~ 5.35
5600	35.5	32.0 ~ 39.1	5.07	4.56 ~ 5.58
5800	35.3	31.8 ~ 38.8	5.27	4.74 ~ 5.80
6000	35.1	31.6 ~ 38.6	5.48	4.93 ~ 6.03
6500	34.5	31.1 ~ 38.0	6.07	5.46 ~ 6.68

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The dielectric properties of the tissue simulating liquids are defined in IEC 62209-1 and IEC 62209-2. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

Since the range of $\pm 10\%$ of the required target values is used to measure relative permittivity and conductivity, the SAR correction procedure is applied to correct measured SAR for the deviations in permittivity and conductivity. Only positive correction has been used to scale up the measured SAR, and SAR result would not be corrected if the correction Δ SAR has a negative sign.

The following table gives the recipes for tissue simulating liquids.

Table-3.2 Recipes of Tissue Simulating Liquid

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether	Oxidized Mineral Oil
H750	0.2	-	0.2	1.5	56.0	-	42.1	-	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-	-
H1450	-	43.3	-	0.6	-	-	56.1	-	-
H1640	-	45.8	-	0.5	-	-	53.7	-	-
H1750	-	47.0	-	0.4	-	-	52.6	-	-
H1800	-	44.5	-	0.3	-	-	55.2	-	-
H1900	-	44.5	-	0.2	-	-	55.3	-	-
H2000	-	44.5	-	0.1	-	-	55.4	-	-
H2300	-	44.9	-	0.1	-	-	55.0	-	-
H2450	-	45.0	-	0.1	-	-	54.9	-	-
H2600	-	45.1	-	0.1	-	-	54.8	-	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-	-
H5G	-	-	-	-	-	17.2	65.5	17.3	-
H6G	-	-	-	-	-	-	56.0	-	44.0

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3.3 SAR System Verification

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.

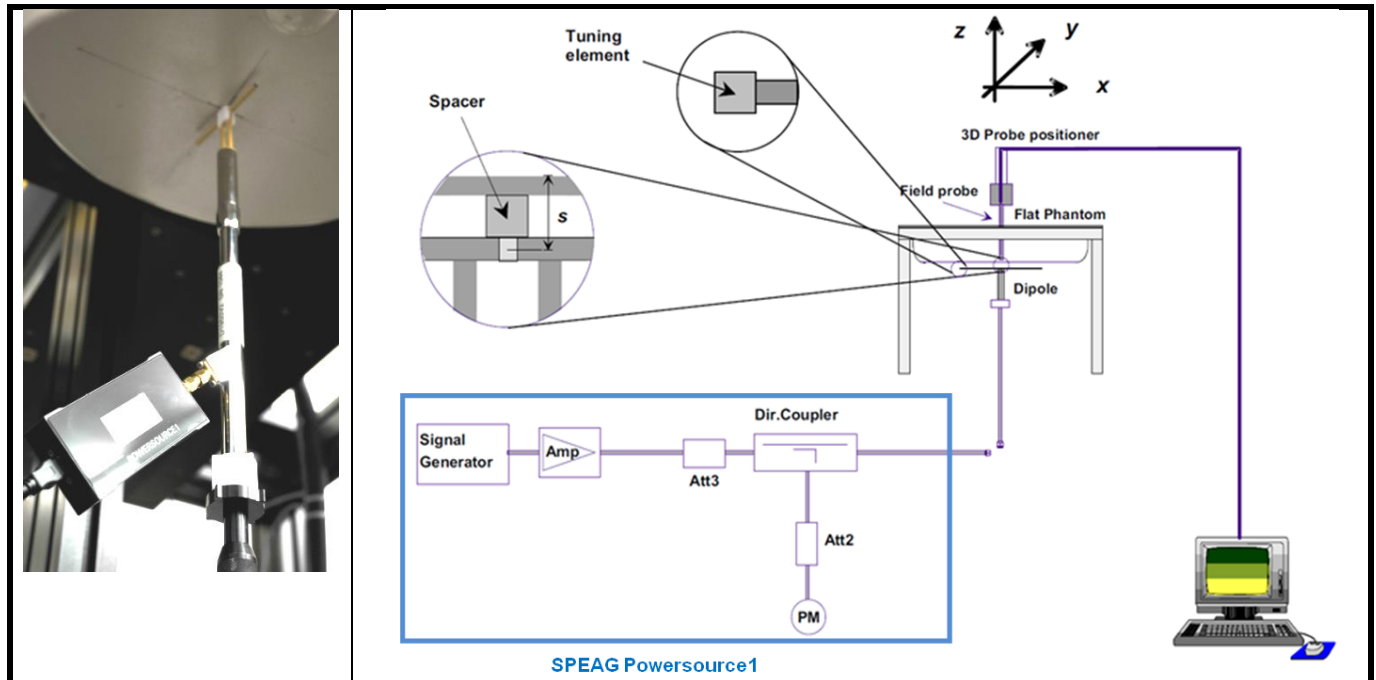


Fig-3.3a System Verification Setup for Frequency ≤ 6 GHz

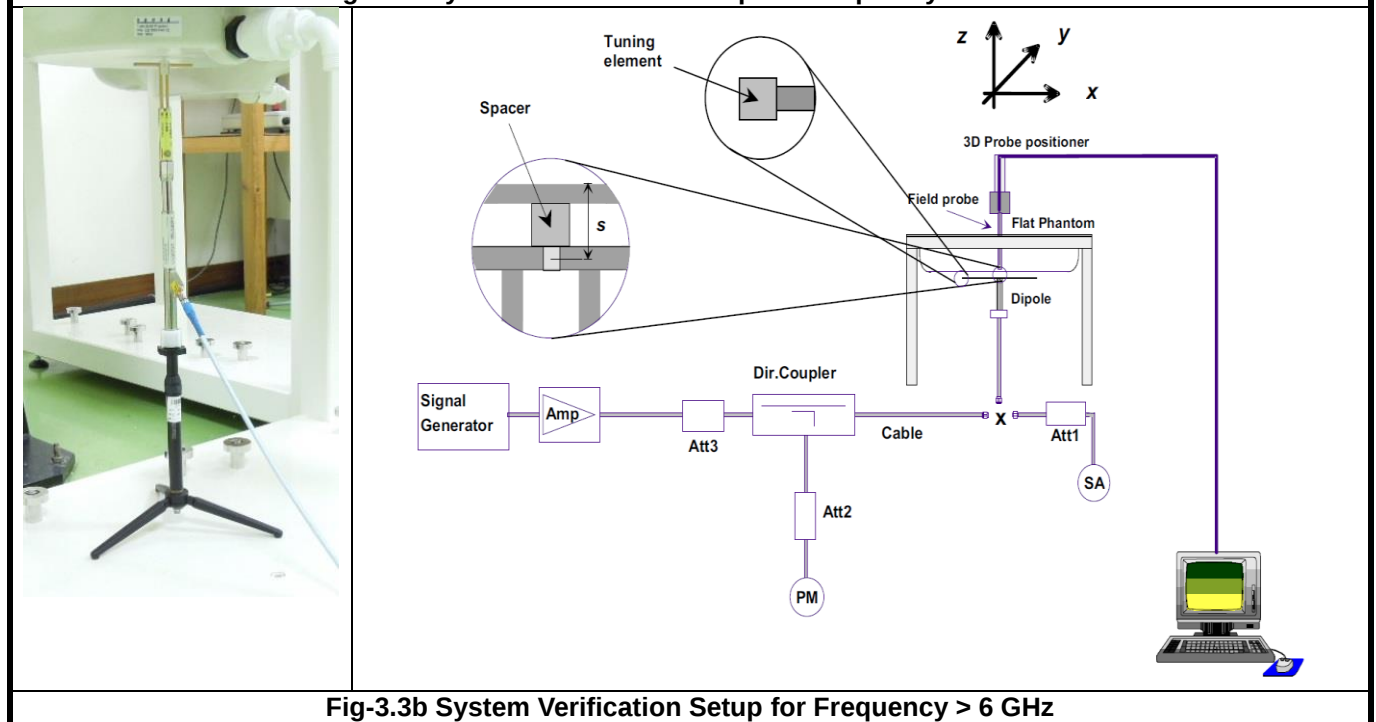


Fig-3.3b System Verification Setup for Frequency > 6 GHz

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For frequency ≤ 6 GHz, the SPEAG Powersource1 is a portable and very stable RF source providing a continuous wave (CW) signal. It is designed for conducting SAR system checks and SAR system validation of DASY and is compatible with IEC/IEEE 62209-1528 and IEEE Std 1528 standards. The Powersource1 has been calibrated by SPEAG's ISO/IEC 17025-accredited calibration center. When using Powersource1, the setup can be simplified, as shown in Fig-3.3a. The signal purity is warranted by design. Since the Powersource1 is calibrated, no additional equipment is needed and the Powersource1 can directly be connected to the SMA connector of the dipole without a cable as all separate components (signal generator, amplifier, coupler and power meter) are built into the unit.

For frequency > 6 GHz, the setup is shown in Fig-3.3b. The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power as 100 mW at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The Powersource1 is adjusted for the desired forward power of 17 dBm or 20 dBm will be set for > 6 GHz at the dipole connector and the RF output power would be turned on. After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

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3.4 SAR Measurement Procedure

According to the SAR test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- Power reference measurement
- Area scan
- Zoom scan
- Power drift measurement

The SAR measurement procedures for each of test conditions are as follows:

- Make EUT to transmit maximum output power
- Measure conducted output power through RF cable
- Place the EUT in the specific position of phantom
- Perform SAR testing steps on the DASY system
- Record the SAR value

3.4.1 Area Scan and Zoom Scan Procedure

First area scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an area scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, zoom scan is required. The zoom scan is performed around the highest E-field value to determine the averaged SAR-distribution.

Measure the local SAR at a test point at 1.4 mm of the inner surface of the phantom recommended by SEPAG. The area scan (two-dimensional SAR distribution) is performed cover at least an area larger than the projection of the EUT or antenna. The measurement resolution and spatial resolution for interpolation shall be chosen to allow identification of the local peak locations to within one-half of the linear dimension of the corresponding side of the zoom scan volume. Following table provides the measurement parameters required for the area scan.

Parameter	$f \leq 3 \text{ GHz}$	$3 \text{ GHz} < f \leq 10 \text{ GHz}$
Maximum distance from closest measurement point to phantom surface	5 ± 1	$\delta \ln(2)/2 \pm 0.5$
Maximum probe angle from probe axis to phantom surface normal at the measurement location	5° for flat phantom 30° for other phantom	5° for flat phantom 20° for other phantom
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	$\leq 2 \text{ GHz: } \leq 15 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 12 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 12 \text{ mm}$ $4 - 6 \text{ GHz: } \leq 10 \text{ mm}$ $6 - 7 \text{ GHz: } \leq 7.5 \text{ mm}$

From the scanned SAR distribution, identify the position of the maximum SAR value, in addition identify the positions of any local maxima with SAR values within 2 dB of the maximum value that will not be within the zoom scan of other peaks. Additional peaks shall be measured only when the primary peak is within 2 dB of the SAR compliance limit (e.g. 1 W/kg for 1.6 W/kg, 1 g limit; or 1.26 W/kg for 2 W/kg, 10 g limit).

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The zoom scan (three-dimensional SAR distribution) is performed at the local maxima locations identified in previous area scan procedure. The zoom scan volume must be larger than the required minimum dimensions. When graded grids are used, which only applies in the direction normal to the phantom surface, the initial grid separation closest to the phantom surface and subsequent graded grid increment ratios must satisfy the required protocols. The 1-g SAR averaging volume must be fully contained within the zoom scan measurement volume boundaries; otherwise, the measurement must be repeated by shifting or expanding the zoom scan volume. The similar requirements also apply to 10-g SAR measurements. Following table provides the measurement parameters required for the zoom scan.

Parameter		$f \leq 3 \text{ GHz}$	$3 \text{ GHz} < f \leq 10 \text{ GHz}$
Maximum zoom scan spatial resolution: $\Delta x_{\text{zoom}}, \Delta y_{\text{zoom}}$		$\leq 2 \text{ GHz: } \leq 8 \text{ mm}$ $2 - 3 \text{ GHz: } \leq 5 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 5 \text{ mm}$ $4 - 6 \text{ GHz: } \leq 4 \text{ mm}$ $6 - 7 \text{ GHz: } \leq 3.4 \text{ mm}$
Maximum zoom scan spatial resolution, normal to phantom surface	<i>uniform grid:</i> $\Delta z_{\text{zoom}}(n)$	$\leq 5 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 4 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 3 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2 \text{ mm}$ $6 - 7 \text{ GHz: } \leq 2 \text{ mm}$
	<i>graded grids:</i> $\Delta z_{\text{zoom}}(1)$	$\leq 4 \text{ mm}$	$3 - 4 \text{ GHz: } \leq 3.0 \text{ mm}$ $4 - 5 \text{ GHz: } \leq 2.5 \text{ mm}$ $5 - 6 \text{ GHz: } \leq 2.0 \text{ mm}$ $6 - 7 \text{ GHz: } \leq 1.7 \text{ mm}$
	$\Delta z_{\text{zoom}}(n>1)$	$\leq 1.5 \cdot \Delta z_{\text{zoom}}(n-1) \text{ mm}$	
Minimum zoom scan volume (x, y, z)		$\geq 30 \text{ mm}$	$3 - 4 \text{ GHz: } \geq 28 \text{ mm}$ $4 - 5 \text{ GHz: } \geq 25 \text{ mm}$ $5 - 6 \text{ GHz: } \geq 22 \text{ mm}$ $6 - 7 \text{ GHz: } \geq 22 \text{ mm}$

Per IEC 62209-2 AMD1, the successively higher resolution zoom scan is required if the zoom scan measured as defined above complies with both of the following criteria, or if the peak spatial-average SAR is below 0.1 W/kg, no additional measurements are needed:

- (1) The smallest horizontal distance from the local SAR peaks to all points 3 dB below the SAR peak shall be larger than the horizontal grid steps in both x and y directions ($\Delta x, \Delta y$). This shall be checked for the measured zoom scan plane conformal to the phantom at the distance z_{M1} .
- (2) The ratio of the SAR at the second measured point (M2) to the SAR at the closest measured point (M1) at the x-y location of the measured maximum SAR value shall be at least 30 %.

If one or both of the above criteria are not met, the zoom scan measurement shall be repeated using a finer resolution. New horizontal and vertical grid steps shall be determined from the measured SAR distribution so that the above criteria are met. Compliance with the above two criteria shall be demonstrated for the new measured zoom scan.

3.4.2 Volume Scan Procedure

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

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3.4.3 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drift more than 5%, the SAR will be retested.

3.4.4 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

3.4.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both based on the modified Quadratic Shepard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.

4. Power Density Measurement System

4.1 Definition of Power Density

The power density for an electromagnetic field represents the rate of energy transfer per unit area. The local power density (i.e. Poynting vector) at a given spatial point is deduced from electromagnetic fields by the following formula:

$$S = \frac{1}{2} \text{Re}\{E \times H^*\} \cdot \vec{n}$$

Where: E is the complex electric field peak phasor and H is the complex conjugate magnetic field peak phasor.

The spatial-average power density distribution on the evaluation surface is determined per the IEC TR 63170. The spatial area, A is specified by the applicable exposure limit or regulatory requirements. The circular shape was used.

$$S_{av} = \frac{1}{2A} \Re \left(\int E \times H^* \cdot \hat{n} dA \right)$$

4.2 SPEAG DASY6 System

The SPEAG DASY6 system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY6 software defined. The DASY6 software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.

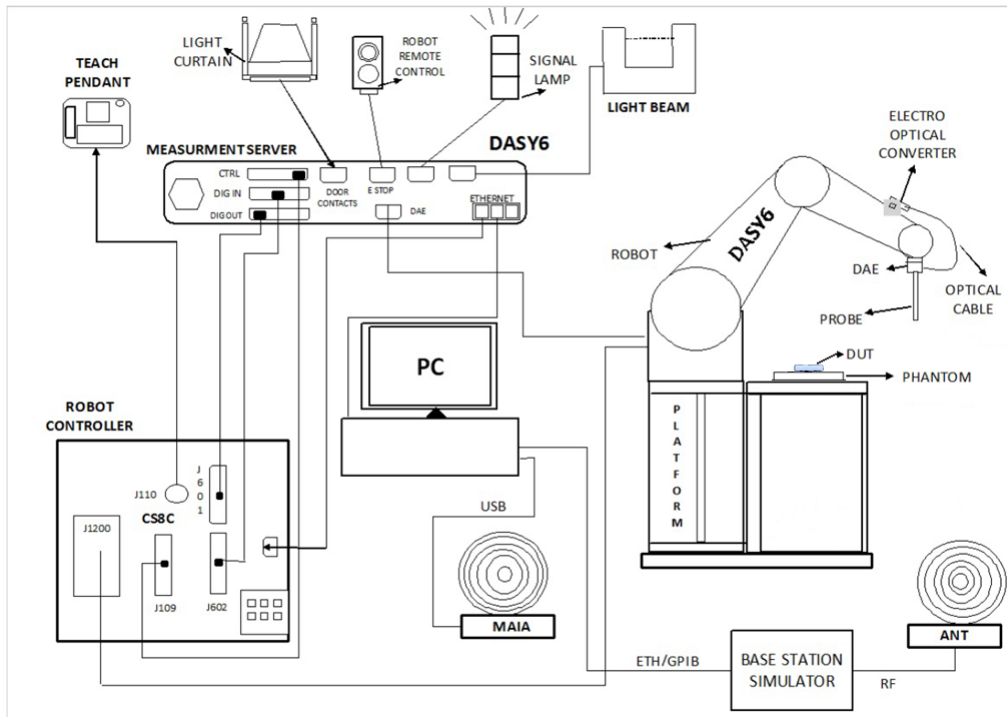


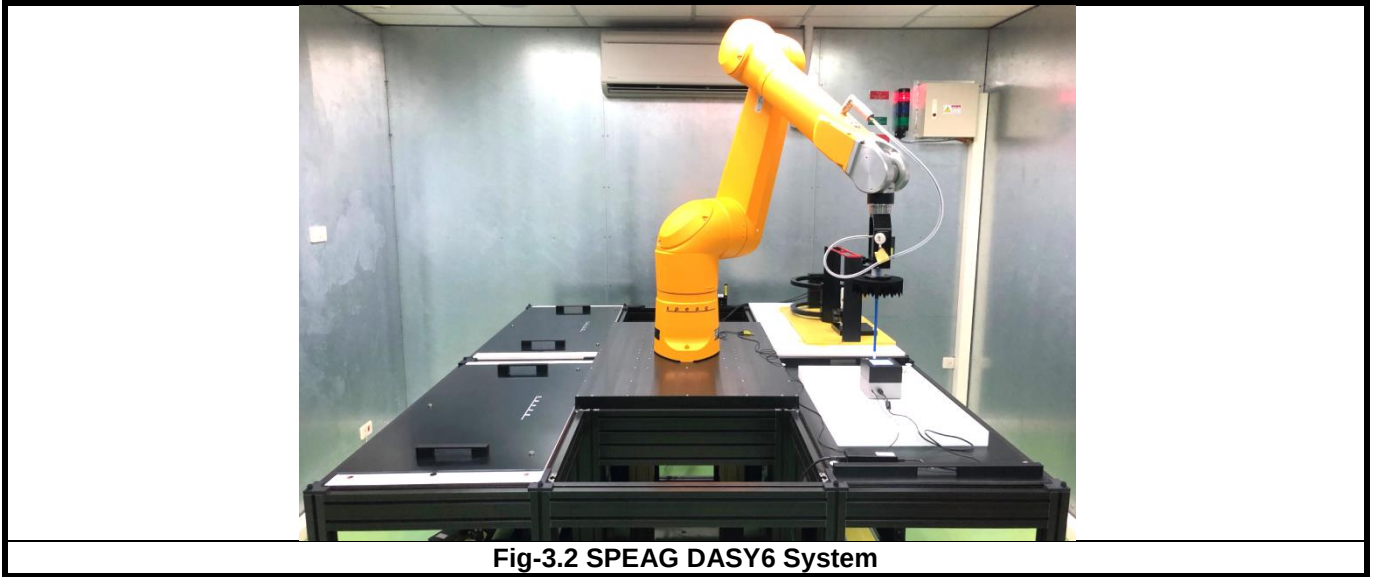
Fig-3.1 SPEAG DASY6 System Configuration

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4.2.1 Robot

The DASY6 system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version of CS8c from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability ± 0.035 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)



4.2.2 EUmWV2 mm-Wave Probe

The EUmWV2 probe is an electric (E) universal (U) field probe with two dipole sensors for field measurements at frequencies up to 110 GHz and as close as 2 mm from any field source or transmitter. The sensors consist of two diode-loaded small dipoles that provide the rectified voltage from the coupled E-field. From the voltages at three different orientations in the field at known angles, both the magnitude of the field component and the field polarization can be calculated. Due to the small size of the sensors, the probe can be used for measurements over an extremely wide frequency range from <1 GHz to 110 GHz. The probe sensors are protected by non-removable 8 mm high-density foam.

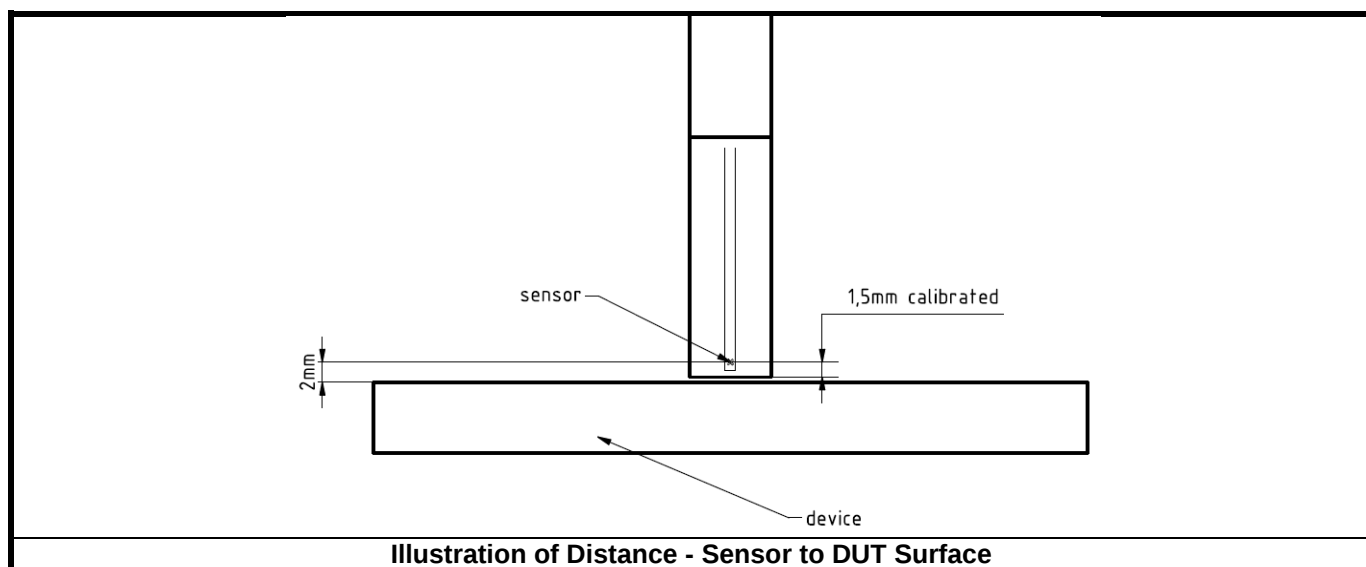
The EUmWV2 probe is based on the pseudo-vector probe design, which not only measures the field magnitude but also derives its polarization ellipse. This probe concept also has the advantage that the sensor angle errors or distortions of the field by the substrate can be largely nullified by calibration. This is particularly important as, at these very high frequencies, field distortions by the substrate are dependent on the wavelength. The design entails two small 0.8 mm dipole sensors mechanically protected by high-density foam, printed on both sides of a 0.9 mm wide and 0.12 mm thick glass substrate. The body of the probe is specifically constructed to minimize distortion by the scattered fields.

SAR and Power Density Test Report

The probe consists of two sensors with different angles arranged in the same plane in the probe axis. Three or more measurements of the two sensors are taken for different probe rotational angles to derive the amplitude and polarization information. These probes are the most flexible and accurate probes currently available for measuring field amplitude.

The probe design allows measurements at distances as small as 2 mm from the sensors to the surface of the device under test (DUT). The typical sensor to probe tip distance is 1.5 mm. The exact distance is calibrated.

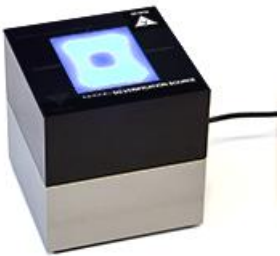
Model	EUmmWV2	
Frequency	750 MHz to 110 GHz	
Dynamic Range	< 20 V/m - 10000 V/m with PRE-10 < 50 V/m - 3000 V/m minimum	
Linearity	< ±0.2 dB	
Hemispherical Isotropy	< 0.5 dB	
Position Precision	< 0.2 mm	
Dimensions	Overall length: 337 mm (tip: 20 mm) Tip diameter: encapsulation 8 mm (internal sensor < 1mm) Distance from probe tip to dipole centers: < 2 mm Sensor displacement to probe's calibration point: < 0.3 mm	

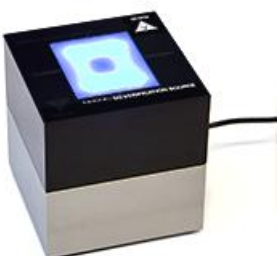


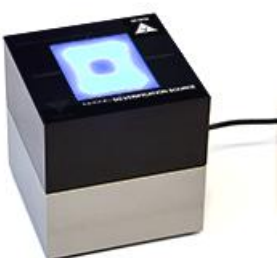
SAR and Power Density Test Report

4.2.3 System Verification Sources

System verification device consists of a horn antenna with corresponding gun oscillator packaged within a cube-shaped housing and power supply provided.

Model	System Verification for Ka-band	
Calibrated Frequency	30 GHz at 10mm from the case surface	
Frequency Accuracy	± 100 MHz	
E-field Polarization	Linear	
Harmonics	-20 dBc	
Total Radiated Power	14 dBm	
Power Stability	0.05 dB	
Power Consumption	5 W	
Size	100 x 100 x 100 mm	
Weight	1 kg	

Model	System Verification for V-band	
Calibrated Frequency	60 GHz at 10mm from the case surface	
Frequency Accuracy	± 100 MHz	
E-field Polarization	Linear	
Harmonics	-20 dBc	
Total Radiated Power	20 dBm	
Power Stability	0.1 dB	
Power Consumption	5 W	
Size	100 x 100 x 100 mm	
Weight	1 kg	

Model	System Verification for W-band	
Calibrated Frequency	90 GHz at 10mm from the case surface	
Frequency Accuracy	± 150 MHz	
E-field Polarization	Linear	
Harmonics	-20 dBc	
Total Radiated Power	16 dBm	
Power Stability	0.15 dB	
Power Consumption	5 W	
Size	100 x 100 x 100 mm	
Weight	1 kg	

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4.3 Power Density System Verification

System check provides a fast and reliable method to routinely verify that the measurement system is operational with no system component failures, including probe defects, drifts or deviation from target performance requirements. A system check also verifies the repeatability of the measurement system before compliance testing.

The measurement of a verification source is started from 5G probe installed and the phantom taught. The verification source is placed on the 5G phantom. Due to the internal distance from the horn to the outer surface of the verification source, the measurement distance set in the software should be offset by -4.45 mm; e.g., for measurement of the verification source at 10 mm, the measurement distance set in the software should be 5.55 mm (10mm - 4.45 mm).

The system check is a complete measurement using simple well-defined reference sources. According to the DASY6 specification in the user's manual and SPEAG's recommendation, the deviation threshold of ± 0.66 dB represents the expanded standard uncertainty for system performance check. The system check is successful if the measured results are within ± 0.66 dB tolerances to the target value shown in the calibration certificate of the verification source. The instrumentation and procedures used for system check should ensure the system is ready for performing compliance tests.

System check using 10 GHz source to support 6-7GHz incident-PD results done with EUmWV probe, the test procedure was following by the SPEAG AppNote Procedures for Device Operating at 6 – 10GHz.

Frequency [GHz]	Grid Step	Grid Extent X/Y [mm]	Measurement Points
10	0.25 ($\lambda/4$)	120 / 120	16 x 16

Table-3.1 Settings for Measurement of Verification Sources

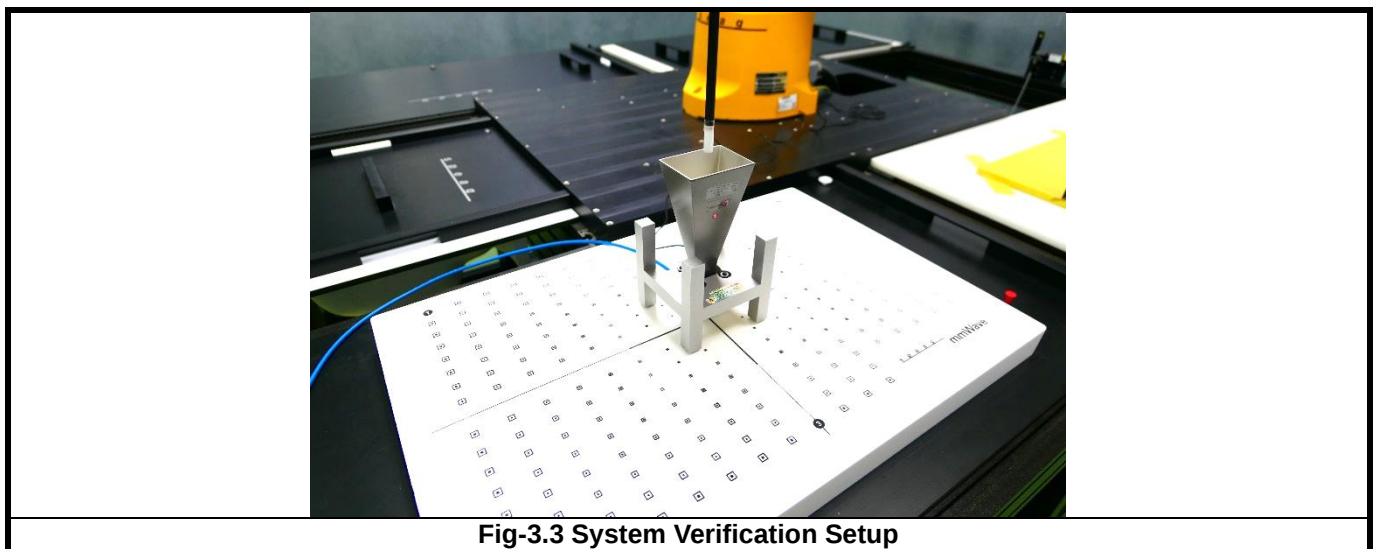


Fig-3.3 System Verification Setup

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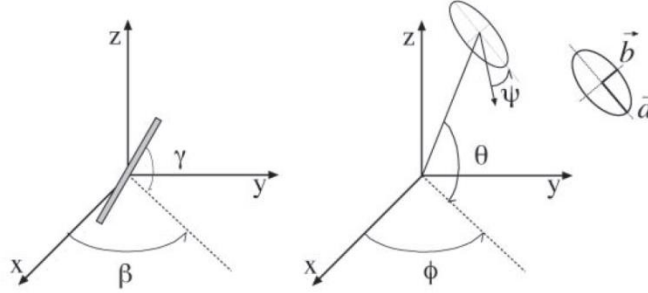
4.4 Power Density Measurement Procedure

Within a short distance from the transmitting source, power density is determined based on both electric and magnetic fields. Generally, the magnitude and phase of two components of either the E-field or H-field are needed on a sufficiently large surface to fully characterize the total E-field and H-field distributions. Nevertheless, solutions based on direct measurement of E-field and H-field can be used to compute power density. When the measurement surface does not correspond to the evaluation surface, reconstruction algorithms are necessary to project or transform the fields from the measurement surface to the evaluation surface. The general measurement approach is summarized in following:

- (a) Measure the E-field on the measurement surface at a reference location where the field is well above the noise level. This reference level will be used at the end of this procedure to assess output power drift of the DUT during the measurement.
- (b) Scan the electric field on the measurement surface. The requirements of measurement surface dimensions and spatial resolution are dependent on the measurement system and assessment methodology applied. Measurements are therefore conducted according to the instructions provided by the measurement system manufacturer.
- (c) Measurement spatial resolution can depend on the measured field characteristic and measurement methodology used by the system. Planar scanners typically require a step size of less than $\lambda / 2$. When measurements are acquired in regions where evanescent modes are not negligible, smaller spatial resolution may be required. Similar criteria also apply to cylindrical scanning systems where the spatial resolution in the vertical direction should be less than $\lambda / 2$.
- (d) Since only E-field is measured on the measurement system, the H-field is calculated from the measured field using a reconstruction algorithm. As power density requires knowledge of both amplitude and phase, reconstruction algorithms can also be used to obtain field information from the measured data (e.g. the phase from the amplitude if only the amplitude is measured). The measurement involves two planes with three different probe rotations on two measurement planes separated by $\lambda / 4$. The grid steps are optimized by the software based on the test frequency. The location of the lowest measurement plane is defined by the distance of first measurement layer from device under test entered by the user. In addition, when the measurement surface does not correspond to the evaluation surface, reconstruction algorithms are employed to project or transform the fields from the measurement surface to the evaluation surface. In substance, reconstruction algorithms are the set of algorithms, mathematical techniques and procedures that are applied to the measured field on the measurement surface to determine E- and H-field (amplitude and phase) on the evaluation surface.
- (e) To determine the spatial-average power density distribution on the evaluation surface. The spatial averaging area, A, is specified by the applicable exposure limits or regulatory requirements. If the shape of the area is not provided by the relevant regulatory requirements, a circular shape is recommended.
- (f) Measure the E-field on the measurement surface position at the reference location chosen in step (a). The power drift of the DUT is estimated as the difference between the squared amplitude of the field values taken in steps (a) and (f). When the drift is smaller than $\pm 5 \%$, this term should be considered in the uncertainty budget. Drifts larger than 5% due to the design and operating characteristics of the device should be accounted for or addressed according to regulatory requirements to determine compliance.

4.4.1 Computation of the Electric Field Polarization Ellipse

For the numerical description of an arbitrarily oriented ellipse in three-dimensional space, five parameters are needed: the semi-major axis (a), the semi-minor axis (b), two angles describing the orientation of the normal vector of the ellipse (Φ , θ), and one angle describing the tilt of the semi-major axis (ψ). For the two extreme cases, i.e., circular and linear polarizations, three parameters only (a , Φ , and θ) are sufficient for the description of the incident field.



For the reconstruction of the ellipse parameters from measured data, the problem can be reformulated as a nonlinear search problem. The semi-major and semi-minor axes of an elliptical field can be expressed as functions of the three angles (Φ , θ , and ψ). The parameters can be uniquely determined towards minimizing the error based on least-squares for the given set of angles and the measured data. In this way, the number of free parameters is reduced from five to three, which means that at least three sensor readings are necessary to gain sufficient information for the reconstruction of the ellipse parameters. However, to suppress the noise and increase the reconstruction accuracy, it is desirable that the system of equations be over-determined. The solution use a probe consisting of two sensors angled by γ_1 and γ_2 toward the probe axis and to perform measurements at three angular positions of the probe, i.e., at β_1 , β_2 , and β_3 , results in over-determinations by a factor of two. If there is a need for more information or increased accuracy, more rotation angles can be added.

The reconstruction of the ellipse parameters can be separated into linear and non-linear parts that are best solved by the givens algorithm combined with a downhill simplex algorithm. To minimize the mutual coupling, sensor angles are set with a shift of 90° ($\gamma_2 = \gamma_1 + 90^\circ$), and, to simplify, the first rotation angle of the probe (β_1) can be set to 0° .

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4.4.2 Total Field and Power Flux Density Reconstruction

Computation of the power density in general requires knowledge of the electric (E-) and magnetic (H-) field amplitudes and phases in the plane of incidence. Reconstruction of these quantities from pseudo-vector E-field measurements is feasible, as they are constrained by Maxwell's equations. The SPEAG have developed a reconstruction approach based on the Gerchberg-Saxton algorithm, which benefits from the availability of the E-field polarization ellipse information obtained with the EUmmWV2 probe. This reconstruction algorithm, together with the ability of the probe to measure extremely close to the source without perturbing the field, permits reconstruction of the E- and H-fields, as well as of the power density, on measurement planes located as near as $\lambda / 5$ away.

4.4.3 Power Flux Density Averaging

The average of the reconstructed power density is evaluated over a circular area in each measurement plane. The area of the circle is defined by the user; the default is 1 cm². The computed peak average value is displayed in the box at the top right. Note that the average is evaluated only for grid points where the averaging circle is completely filled with values; for points at the edge where the averaging circle is only partly filled with values, the average power density is set to zero. Two average power density values are computed:

- 1) $|\text{Re}(S)|$ is the average total power density.
- 2) $\vec{n} \cdot \text{Re}(S)$ is the average incident power density.

5. SAR Measurement Evaluation

5.1 EUT Configuration and Setting

<Considerations Related to WLAN for Setup and Testing>

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. A Wi-Fi device must be 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 for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies. 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. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

According to KDB 248227 D01, this device has installed WLAN engineering testing software which can provide continuous transmitting RF signal. During WLAN SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

Initial Test Configuration

An initial test configuration is determined for OFDM transmission modes in 2.4 GHz and 5 GHz bands 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. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

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Subsequent Test Configuration

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. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. 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.

SAR Test Configuration and Channel Selection

When multiple channel bandwidth configurations in a frequency band have the same specified maximum output power, the initial test configuration is using largest channel bandwidth, lowest order modulation, lowest data rate, and lowest order 802.11 mode (i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n). After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following.

- 1) The channel closest to mid-band frequency is selected for SAR measurement.
- 2) For channels with equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

Test Reduction for U-NII-1 (5.2 GHz) and U-NII-2A (5.3 GHz) Bands

For devices that operate in both U-NII bands using the same transmitter and antenna(s), SAR test reduction is determined according to the following.

- 1) When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest reported SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band for that configuration (802.11 mode and exposure condition).
- 2) When different maximum output power is specified for the bands, begin SAR measurement in the band with higher specified maximum output power. The highest reported SAR for the tested configuration is adjusted by the ratio of lower to higher specified maximum output power for the two bands. When the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for the band with lower maximum output power in that test configuration.

SAR and Power Density Test Report

<Considerations Related to Bluetooth for Setup and Testing>

This device has installed Bluetooth engineering testing software which can provide continuous transmitting RF signal. During Bluetooth SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

The Bluetooth call box has been used during SAR measurement and the EUT was set to DH5 mode at the maximum output power. Its duty factor was calculated as below and the measured SAR for Bluetooth would be scaled to the 100% transmission duty factor to determine compliance.



Time-domain plot for Bluetooth transmission signal

The duty factor of Bluetooth signal has been calculated as following.

$$\text{Duty Factor} = \text{Pulse Width} / \text{Total Period} = (9.87 - 6.97) / (10.73 - 6.97) = 77.13 \%$$

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5.2 EUT Testing Position

For laptop PC, according to KDB 616217 D04, SAR evaluation is required for the bottom surface of the keyboard. This EUT was tested in the base of EUT directly against the flat phantom. The required minimum test separation distance for incorporating transmitters and antennas into laptop computer display is determined with the display screen opened at an angle of 90° to the keyboard compartment.

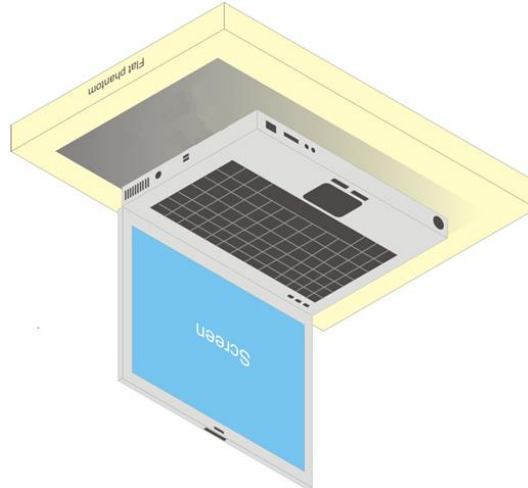


Fig-4.1 Illustration for Laptop Setup

5.3 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Plot No.	Test Date	Frequency (MHz)	Liquid Temp. (°C)	Measured Conductivity (σ)	Measured Permittivity (ϵ_r)	Target Conductivity (σ)	Target Permittivity (ϵ_r)	Conductivity Deviation (%)	Permittivity Deviation (%)
S07	Dec. 26, 2022	2450	22.5	1.807	39.297	1.8	39.2	0.39	0.25
S08	Feb. 24, 2023	5250	20.5	4.58	37.58	4.71	35.9	-2.76	4.68
S09	Feb. 24, 2023	5600	20.5	4.981	36.98	5.07	35.5	-1.76	4.17
S10	Dec. 27, 2022	5750	21.5	5.12	36.673	5.22	35.4	-1.92	3.60
S11a	Mar. 02, 2023	5750	21.1	4.88	34	5.22	35.4	-6.51	-3.95
S11b	Mar. 02, 2023	6500	21.1	5.97	34.4	6.07	34.5	-1.65	-0.29
S12	Dec. 26, 2022	2450	22.5	1.807	39.297	1.8	39.2	0.39	0.25
S14	Dec. 27, 2022	6500	21.5	5.97	33.7	6.07	34.5	-1.65	-2.32
S15	Feb. 24, 2023	6500	21.2	6.07	35.5	6.07	34.5	0.00	2.90

Note:

The dielectric properties of the tissue simulating liquid have been measured within 24 hours before the SAR testing and within ± 10 % of the target values. Liquid temperature during the SAR testing has kept within ± 2 °C.

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5.4 System Validation

The SAR measurement system was validated according to procedures in KDB 865664 D01. The validation status in tabulated summary is as below.

Plot No.	Test Date	Probe S/N	Calibration Point	Measured Conductivity (σ)	Measured Permittivity (ϵ_r)	Validation for CW			Validation for Modulation		
						Sensitivity Range	Probe Linearity	Probe Isotropy	Modulation Type	Duty Factor	PAR
S07	Dec. 26, 2022	7472	2450	1.807	39.297	Pass	Pass	Pass	OFDM	N/A	Pass
S08	Feb. 24, 2023	7472	5250	4.58	37.58	Pass	Pass	Pass	OFDM	N/A	Pass
S09	Feb. 24, 2023	7472	5600	4.981	36.98	Pass	Pass	Pass	OFDM	N/A	Pass
S10	Dec. 27, 2022	7537	5750	5.12	36.673	Pass	Pass	Pass	OFDM	N/A	Pass
S11a	Mar. 02, 2023	7554	5750	4.88	34	Pass	Pass	Pass	OFDM	N/A	Pass
S11b	Mar. 02, 2023	7554	6500	5.97	34.4	Pass	Pass	Pass	OFDM	N/A	Pass
S12	Dec. 26, 2022	7472	2450	1.807	39.297	Pass	Pass	Pass	OFDM	N/A	Pass
S14	Dec. 27, 2022	7537	6500	5.97	33.7	Pass	Pass	Pass	OFDM	N/A	Pass
S15	Feb. 24, 2023	7472	6500	6.07	35.5	Pass	Pass	Pass	OFDM	N/A	Pass

5.5 System Verification

The measuring result for system verification is tabulated as below.

Plot No.	Test Date	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
S07	Dec. 26, 2022	2450	52.60	2.43	48.48	-7.82	737	7472	579
S08	Feb. 24, 2023	5250	80.60	3.72	74.22	-7.91	1019	7472	579
S09	Feb. 24, 2023	5600	82.40	4.14	82.60	0.25	1019	7472	579
S10	Dec. 27, 2022	5750	79.40	3.89	77.62	-2.25	1019	7537	1585
S11a	Mar. 02, 2023	5750	79.40	3.77	75.22	-5.26	1019	7554	1341
S11b	Mar. 02, 2023	6500	289.00	29.7	297.00	2.77	1008	7554	1341
S12	Dec. 26, 2022	2450	52.60	2.43	48.48	-7.82	737	7472	579
S14	Dec. 27, 2022	6500	289.00	29.3	293.00	1.38	1008	7537	1585
S15	Feb. 24, 2023	6500	289.00	28.6	286.00	-1.04	1008	7472	579

Plot No.	Test Date	Frequency [GHz]	mmWave Probe S/N	Verification Source S/N	Averaging Area [cm ²]	Distance [mm]	Target Power Density [W/m ²]	Measured Power Density [W/m ²]	Deviation [%]
S14	Dec. 29, 2022	10	9438	1025	4	10.0	51.3	52.4	2.14%
S15	Mar. 01, 2023	10	9438	1025	4	10.0	53.6	56.1	4.66%

Note:

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.

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5.6 Maximum Output Power

5.6.1 Maximum Target Conducted Power

Refer to Appendix D.

5.6.2 Measured Conducted Power Result

Refer to Appendix E.

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5.7 SAR Testing Results

5.7.1 SAR Test Reduction Considerations

<KDB 447498 D01, General RF Exposure Guidance>

Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:

- (1) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- (2) ≤ 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
- (3) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

When SAR is not measured at the maximum power level allowed for production units, the measured SAR will be scaled to the maximum tune-up tolerance limit to determine compliance. The scaling factor for the tune-up power is defined as maximum tune-up limit (mW) / measured conducted power (mW). The reported SAR would be calculated by measured SAR x tune-up power scaling factor.

The SAR has been measured with highest transmission duty factor supported by the test mode tools for WLAN and/or Bluetooth. When the transmission duty factor could not achieve 100%, the reported SAR will be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up power. The scaling factor for the duty factor is defined as 100% / transmission duty cycle (%). The reported SAR would be calculated by measured SAR x tune-up power scaling factor x duty cycle scaling factor.

<KDB 248227 D01, SAR Guidance for Wi-Fi Transmitters>

- (1) For handsets operating next to ear, hotspot mode or mini-tablet configurations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When the reported SAR of initial test position is ≤ 0.4 W/kg, SAR testing for remaining test positions is not 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.
- (2) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is ≤ 0.8 W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n), SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is ≤ 1.2 W/kg.
- (3) For WLAN 5GHz, the initial test configuration was selected according to the transmission mode with the highest maximum output power. When the reported SAR of initial test configuration is > 0.8 W/kg, SAR is required for the subsequent highest measured output power channel until the reported SAR result is ≤ 1.2 W/kg or all required channels are measured. For other transmission modes, SAR is not required when the highest reported SAR for initial test configuration is adjusted by the ratio of subsequent test configuration to initial test configuration specified maximum output power and it is ≤ 1.2 W/kg.
- (4) For WLAN MIMO mode, the power-based standalone SAR test exclusion or the sum of SAR provision in KDB 447498 to determine simultaneous transmission SAR test exclusion should be applied. Otherwise, SAR for MIMO mode will be measured with all applicable antennas transmitting simultaneously at the specified maximum output power of MIMO operation.

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5.7.2 SAR Test Results for Body Exposure Condition

Refer to Appendix F.

5.7.3 Power Density Test Results for Body Exposure Condition

Refer to Appendix F.

5.7.4 SAR Measurement Variability

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10 , the highest SAR configuration for either head or body tissue-equivalent medium maybe used to perform the repeated measurement. These additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR repeated measurement procedure:

1. When the highest measured SAR is < 0.80 W/kg, repeated measurement is not required.
2. When the highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
3. If the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 , or when the original or repeated measurement is ≥ 1.45 W/kg, perform a second repeated measurement.
4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 , and the original, first or second repeated measurement is ≥ 1.5 W/kg, perform a third repeated measurement.

Since all the measured SAR_{1g} are less than 0.8 W/kg, the repeated measurement is not required.

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5.7.5 Simultaneous Multi-band Transmission Evaluation

<Possibilities of Simultaneous Transmission>

The simultaneous transmission possibilities for this device are listed as below.

Simultaneous TX Combination	Capable Transmit Configurations	Body Exposure Condition
A	MAX WLAN 5G + BT_Ant 1	Yes
B	MAX WLAN 2.4G + MAX WLAN 5G	Yes
C	MAX WLAN 6G + BT_Ant 1	Yes
D	MAX WLAN 2.4G + MAX WLAN 6G	Yes

Note

- The WLAN 2.4G, WLAN 5G and WLAN 6G cannot transmit simultaneously.

<SAR Summation Analysis>

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna. When the sum of SAR_{1g} of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit (SAR_{1g} 1.6 W/kg), the simultaneous transmission SAR is not required. When the sum of SAR_{1g} is greater than the SAR limit (SAR_{1g} 1.6 W/kg), SAR test exclusion is determined by the SPLSR.

Position	1	2	3	4	A(2+4)	B(1+2)	C(3+4)	D(1+3)
	Max WLAN 2.4GHz 1g SAR W/kg	Max WLAN 5GHz 1g SAR W/kg	Max WLAN 6GHz 1g SAR W/kg	Max BT Ant 1 1g SAR W/kg	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg	Summing result 1g SAR W/kg
Bottom of Laptop	0.33	0.10	0.34	0.00	0.10	0.43	0.34	0.67

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<SAR to Peak Location Separation Ratio Analysis>

The simultaneous transmitting antennas in each operating mode and exposure condition combination are considered one pair at a time to determine the SPLSR. When SAR is measured for both antennas in the pair, the peak location separation distance is computed by the following formula.

$$\text{Peak Location Separation Distance} = \sqrt{(x_1 - x_2)^2 + (y_1 - y_2)^2 + (z_1 - z_2)^2}$$

Where (x_1, y_1, z_1) and (x_2, y_2, z_2) are the coordinates of the extrapolated peak SAR locations in the area or zoom scans.

When standalone test exclusion applies, SAR is estimated; the peak location is assumed to be at the feed-point or geometric center of the antenna. Due to curvatures on the SAM phantom, when SAR is estimated for one of the antennas in an antenna pair, the measured peak SAR location will be translated onto the test device to determine the peak location separation for the antenna pair.

The SPLSR is determined by the following formula.

$$\text{SPLSR} = \frac{(\text{SAR}_1 + \text{SAR}_2)^{1.5}}{R_i}$$

Where SAR_1 and SAR_2 are the highest reported or estimated SAR for each antenna in the pair, and R_i is the separation distance between the peak SAR locations for the antenna pair in mm.

When the SPLSR is ≤ 0.04 , the simultaneous transmission SAR is not required. Otherwise, the enlarged zoom scan and volume scan post-processing procedures will be performed.

Since sum of simultaneous transmission SAR is less than the SAR limit for Body : SAR1g 1.6 W/kg .
There is no requirement for SAR to Peak Location Separation Ratio Analysis.

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<Total Exposure Ratio Analysis>

The fields generated by the antennas can be correlated or uncorrelated. At different frequencies, fields are always uncorrelated, and the aggregate power density contributions can be summed according to spatially averaged values of corresponding sources at any point in space, r , to determine the total exposure ratio (TER). Assuming I sources, the TER at each point in space is equal to

$$TER^{uncorr}(r) = \sum_{i=1}^I ER_i = \sum_{i=1}^I \frac{S_{av,i}(r, f_i)}{S_{lim}(f_i)}$$

where $S_{av,i}$ is the power density for the source i operating at a frequency f_i , and S_{lim} is the power density limit as specified by the relevant standard.

Exposure from transmitters operating above and below 6 GHz, where 6 GHz denotes the transition frequency where the basic restrictions change from being defined in terms of SAR to being defined in terms of power density, are therefore uncorrelated and the TER is determined as

$$TER^{uncorr}(r) = TER(r)_{f \leq 6GHz} + TER(r)_{f > 6GHz}$$

According to the FCC guidance in Oct. 2022 TCB workshop and IEC TR 63170, the total exposure ratio calculated by taking ratio of maximum reported SAR divided by SAR limit and adding it to maximum measured power density divided by power density limit. Numerical sum of the ratios should be less than 1.

The TER analysis for this device are listed as below.

Position	1	2	3	C(2+3)	D(1+2)
	Max WLAN 2.4GHz 1g SAR W/kg	Max WLAN 6GHz 4cm ² W/m ²	Max BT Ant 1 1g SAR W/kg	Total Exposure Ratio	Total Exposure Ratio
Bottom of Laptop	0.33	5.26	0.00	0.53	0.73

Test Engineer : Dean Tsai

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6. Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	737	Aug. 25, 2022	1 Year
System Validation Dipole	SPEAG	D5GHzV2	1019	Mar. 18, 2022	1 Year
System Validation Dipole	SPEAG	D6.5GHzV2	1008	Aug. 29, 2022	1 Year
System Verification Source	SPEAG	5G Verification Source 10 GHz	1025	Jan. 17, 2022	1 Year
System Verification Source	SPEAG	5G Verification Source 10 GHz	1025	Jan. 19, 2023	1 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	7472	May. 27, 2022	1 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	7537	Apr. 27, 2022	1 Year
Dosimetric E-Field Probe	SPEAG	EX3DV4	7554	Jul. 28, 2022	1 Year
E-Field Probe	SPEAG	EUmmWV4	9438	Jul. 18, 2022	1 Year
Data Acquisition Electronics	SPEAG	DAE3	579	Jun. 01, 2022	1 Year
Data Acquisition Electronics	SPEAG	DAE4	1585	Apr. 21, 2022	1 Year
Data Acquisition Electronics	SPEAG	DAE4	1341	Jul. 19, 2022	1 Year
Analog Signal Generator	R&S	SMA100B	104417	Oct. 21, 2022	1 Year
Mini-Circuits Wideband Amplifier	Mini-Circuits	ZVA-183-S+	434502031A	Jul. 09, 2022	1 Year
Universal Wireless Test Set	Anritsu	MT8870A	6201699387	Sep. 22, 2022	1 Year
Thermometer	YFE	YF-160A	120702365	Aug. 09, 2022	1 Year
Dielectric Assessment Kit	SPEAG	DAKS-3.5	1092	May. 23, 2022	1 Year
Dielectric Assessment Kit	SPEAG	DAKS_VNA R140	0010917	May. 23, 2022	1 Year
Powersource1	SPEAG	SE_UMS_160 BA	4010	Jul. 25, 2022	1 Year

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7. Measurement Uncertainty

According to KDB 865664 D01, SAR measurement uncertainty analysis is required in SAR reports only when the highest measured SAR in a frequency band is ≥ 1.5 W/kg for 1-g SAR, and ≥ 3.75 W/kg for 10-g SAR. The procedures described in IEEE Std 1528-2013 should be applied. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. When the highest measured SAR within a frequency band is < 1.5 W/kg for 1-g and < 3.75 W/kg for 10-g, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. Hence, the measurement uncertainty analysis for SAR is not required in this SAR report because the test result met the condition. The uncertainty analysis for power density tabulated as below.

Source of Uncertainty	Uncertainty ($\pm$ dB)	Probability Distribution	Divisor	Ci	Standard Uncertainty ($\pm$ dB)	Vi
Measurement System						
Probe Calibration	0.49	Normal	1	1	0.49	∞
Hemispherical Isotropy	0.50	Rectangular	$\sqrt{3}$	1	0.29	∞
Linearity	0.20	Rectangular	$\sqrt{3}$	1	0.12	∞
System Detection Limits	0.04	Rectangular	$\sqrt{3}$	1	0.02	∞
Modulation Response	0.40	Rectangular	$\sqrt{3}$	1	0.23	∞
Readout Electronics	0.03	Normal	1	1	0.03	∞
Response Time	0.00	Rectangular	$\sqrt{3}$	1	0.00	∞
Integration Time	0.00	Rectangular	$\sqrt{3}$	1	0.00	∞
RF Ambient Conditions – Noise	0.20	Rectangular	$\sqrt{3}$	1	0.12	∞
RF Ambient Conditions – Reflections	0.20	Rectangular	$\sqrt{3}$	1	0.12	∞
Probe Positioner Mechanical Tolerance	0.04	Rectangular	$\sqrt{3}$	1	0.02	∞
Probe Positioning with Respect to Phantom	0.30	Rectangular	$\sqrt{3}$	1	0.17	∞
S _{avg} Reconstruction	2.00	Rectangular	$\sqrt{3}$	1	1.15	∞
Test Sample Related						
Power Drift of Measurement	0.20	Rectangular	$\sqrt{3}$	1	0.12	∞
Input Power	0.00	Normal	1	1	0.00	∞
Combined Standard Uncertainty					± 1.34	
Expanded Uncertainty (K=2)					± 2.68	

Uncertainty Budget for Power Density Measurement for Frequency Range of 6 GHz to 10 GHz

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8. Information of the Testing Laboratories

We, Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch, were founded in 1988 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

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The road map of all our labs can be found in our web site also.

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