

# **TEST REPORT**

**Applicant:** Jiangxi Lianchuang Hongsheng Electronic Co., Ltd.

No. 818, Yaohuxi 6th Road, Nanchang High-Tech

Address: Industries Development Zone, Nanchang City,

Jiangxi, P.R. China(330096)

**Equipment Type:** Bluetooth Earbuds

Model Name: MAK-ME00

Brand Name: LCHSE/HONOR CHOICE

FCC ID: 2BAPQ-MAK-ME00

Test Standard: FCC 47 CFR Part 2.1093

(refer to section 3.1)

Maximum SAR: Head (1 g@0mm): 0.35 W/kg

Sample Arrival Date: Sep. 05, 2024

**Test Date:** Sep. 18, 2024

Date of Issue: Oct. 16, 2024

#### **ISSUED BY:**

Xu Rui

Shenzhen BALUN Technology Co., Ltd.

Tested by: Xu Rui Checked by: Liyao Zong Approved by: Tolan Tu

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(Testing Director)

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## **Revision History**

Version Rev. 01

Issue Date
Oct. 16, 2024

**Revisions Content** 

Initial Issue

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## 1 GENERAL INFORMATION

## 1.1 Test Laboratory

Name	Shenzhen BALUN Technology Co., Ltd.
Addross	Block B, 1/F, Baisha Science and Technology Park, Shahe Xi Road,
Address	Nanshan District, Shenzhen, Guangdong Province, P. R. China
Phone Number	+86 755 6685 0100

## 1.2 Test Location

Name Shenzhen BALUN Technology Co., Ltd.	
	☐ Block B, 1/F, Baisha Science and Technology Park, Shahe Xi
	Road, Nanshan District, Shenzhen, Guangdong Province, P. R.
Location	China
Location	☑ 1/F, Building B, Ganghongji High-tech Intelligent Industrial Park,
	No. 1008, Songbai Road, Yangguang Community, Xili Sub-district,
	Nanshan District, Shenzhen, Guangdong Province, P. R. China
Accreditation	The laboratory is a testing organization accredited by FCC as a
Certificate	accredited testing laboratory. The designation number is CN1196.

## 1.3 Test Environment Condition

Ambient Temperature	18°C to 25°C
Ambient Relative	200/ 1- 700/
Humidity	30% to 70%



## **2 PRODUCT INFORMATION**

## 2.1 Applicant Information

Applicant	Jiangxi Lianchuang Hongsheng Electronic Co., Ltd.	
A dalara a a	No. 818, Yaohuxi 6th Road, High-Tech Industries Development Zone,	
Address	Nanchang City, Jiangxi, P.R. China(330096)	

### 2.2 Manufacturer Information

Manufacturer Jiangxi Lianchuang Hongsheng Electronic Co., Ltd.		Jiangxi Lianchuang Hongsheng Electronic Co., Ltd.
	Address	No. 818, Yaohuxi 6th Road, High-Tech Industries Development Zone,
		Nanchang City, Jiangxi, P.R. China(330096)

## 2.3 General Description for Equipment under Test (EUT)

EUT Name	Bluetooth Earbuds
Model Name Under Test	MAK-ME00
Series Model Name	N/A
Description of Model	N/A
name differentiation	N/A
Hardware Version	V2.2
Software Version	V1.0.2.7
Dimensions (Approx.)	N/A
Weight (Approx.)	N/A

## 2.4 Ancillary Equipment

	Battery	
	Brand Name	N/A
	Model No.	CH1140AA
	Serial No.	N/A
	Capacitance	46mAh
Ancillary Equipment 1	Rated Voltage	3.85V
Anomary Equipment 1	Limited Voltage	4.4V
	Manufacturer	Shenzhen Hynetech Company Limited
		Room 402, No. 3 Plant, Huayilong Park,
	Manufacturer Address	No. 43 Cuijing Road, Zhukeng Community,
		Longtian Street, Pingshan District,
		Shenzhen, P.R. China

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## 2.5 Technical Information

Network and Wireless	Plustooth (PRIEDRIPLE)
connectivity	Bluetooth (BR+EDR+BLE)

The requirement for the following technical information of the EUT was tested in this report:

Operating Mode	Bluetooth	
Frequency Range	Bluetooth	2400 ~ 2483.5 MHz
Antenna Type	FPC Antenna	
Hotspot Function	Not Support	
Exposure Category	General Population/Uncontrolled exposure	
Product Type	Portable Device	
EUT Type   Production unit		☐ Identical prototype



## 3 SUMMARY OF TEST RESULT

## 3.1 Test Standards

No.	Identity	Document Title	
1	47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices	
2	ANSI C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure	
		to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz	
	   IEEE Std. 1528-	IEEE Recommended Practice for Determining the Peak Spatial-	
3	2013	Average Specific Absorption Rate(SAR) in the Human Head from	
	2013	Wireless Communications Devices: Measurement Techniques	
4	KDB 447498 D04	447498 D04 Interim General RF Exposure Guidance v01	
4	v01	447496 D04 IIII General RF Exposure Guidance vo i	
5	KDB 865664 D01	CAD Magazirament 100 MHz to 6 CHz	
3	v01r04	SAR Measurement 100 MHz to 6 GHz	
	KDB 865664 D02	DE Evenesius Deposition	
6	v01r02	RF Exposure Reporting	



## 3.2 Device Category and SAR Limit

This device belongs to portable device category because its radiating structure is allowed to be used within 20 centimeters of the body of the user.

Limit for General Population/Uncontrolled exposure should be applied for this device, it is 1.6 W/kg as averaged over any 1 gram of tissue.

Table of Exposure Limits:

	SAR Valu	ıe (W/Kg)		
Body Position	General Population/	Occupational/		
	Uncontrolled Exposure	Controlled Exposure		
Whole-Body SAR	0.08	0.4		
(averaged over the entire body)	0.08	0.4		
Partial-Body SAR	1.60	8.0		
(averaged over any 1 gram of tissue)	1.00	8.0		
SAR for hands, wrists, feet and				
ankles	4.0	20.0		
(averaged over any 10 grams of tissue)				

#### NOTE:

General Population/Uncontrolled Exposure: Locations where there is the exposure of individuals who have no knowledge or control of their exposure. General population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

Occupational/Controlled Exposure: Locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

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## 3.3 Test Result Summary

## 3.3.1 Highest SAR (1 g Value)

Equipment		Maximum Report SAR
	Dand	(W/kg)
Class	Band	Head (Separation 0mm)
		1g SAR
DSS	Bluetooth	0.35
Limits (W/kg)		1.6
Test Verdict		Pass

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### 3.4 Test Uncertainty

According to KDB 865664 D01, when the highest measured 1 g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis is not required in SAR reports submitted for equipment approval.

The maximum 1 g SAR for the EUT in this report is 0.35 W/kg, which is lower than 1.5 W/kg, so the extensive SAR measurement uncertainty analysis is not required in this report.



### 4 MEASUREMENT SYSTEM

## 4.1 Specific Absorption Rate (SAR) Definition

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 ( $\rho$ ). 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

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

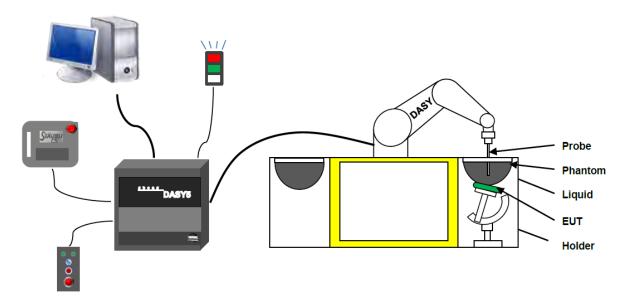
Where:  $\sigma$  is the conductivity of the tissue,

pis the mass density of the tissue and E is the RMS electrical field strength.



## 4.2 DASY SAR System

#### 4.2.1 DASY SAR System Diagram



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

- 1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).
- 2. A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, ADconversion, 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.
- 4. A unit to operate the optical surface detector which is connected to the EOC.
- 5. The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.
- 6. The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation.
- 7. DASY5 software and SEMCAD data evaluation software.
- 8. Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
- 9. The generic twin phantom enabling the testing of left-hand and right-hand usage.
- 10. The device holder for handheld mobile phones.
- 11. Tissue simulating liquid mixed according to the given recipes.
- 12. System validation dipoles allowing to validate the proper functioning of the system.



#### 4.2.2 Robot

The Dasy SAR system uses the high precision robots. Symmetrical design with triangular core Built-in optical fiber for surface detection system For the 6-axis controller system, Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents). The robot series have many features that are important for our application:



- High precision (repeatability ±0.02 mm)
- High reliability (industrial design)
- Low maintenance costs
  (virtually maintenance free due to direct drive gears; no belt drives)
- Jerk-free straight movements
   (brush less synchron motors; no stepper motors)
- Low ELF interference (motor control \_elds shielded via the closed metallic construction shields)



#### 4.2.3 E-Field Probe

The probe is specially designed and calibrated for use in liquids with high permittivities for the measurements the Specific Dosimetric E-Field Probe EX3DV4-SN: 7510 with following specifications is used.

Construction Symmetrical design with triangular core Built-in optical fiber for surface detection

systemBuilt-in shielding against static charges PEEK enclosure material (resistant to

organic solvents, e.g., glycolether)

Calibration ISO/IEC 17025 calibration service available

Frequency 10 MHz to 6 GHz; Linearity: ± 0.2 dB (30 MHz to 6 GHz)

Directivity ± 0.2 dB in HSL (rotation around probe axis); ± 0.4 dB in HSL (rotation normal to probe

axis)

Dynamic range  $5 \mu W/g$  to > 100 mW/g; Linearity:  $\pm 0.2 dB$ 

Dimensions Overall length: 337 mm (Tip: 9 mm) Tip diameter: 2.5 mm (Body: 10 mm) Distance from

probe tip to dipole centers: 1.0 mm

Application General dosimetry up to 3 GHz Compliance tests of mobile phones Fast automatic

scanning in arbitrary phantoms (EX3DV4)



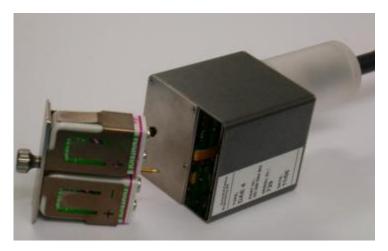
#### **E-Field Probe Calibration Process**

Probe calibration is realized, in compliance with CENELEC EN 62209-1/-2 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 62209-1/2 annexe technique using reference guide at the five frequencies.



#### 4.2.4 Data Acquisition Electronics

The data acquisition electronics (DAE) consist of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converte and a command decoder with a control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information, as well as an optical uplink for commands and the clock.



- · Input Impedance: 200MOhm
- · The Inputs: Symmetrical and Floating
- · Commom Mode Rejection: Above 80dB



#### 4.2.5 Phantoms

For the measurements the Specific Anthropomorphic Mannequin (SAM) defined by the IEEE SCC-34/SC2 group is used. The phantom is a polyurethane shell integrated in a wooden table. The thickness of the phantom amounts to 2mm +/- 0.2mm. It enables the dosimetric evaluation of left and right phone usage and includes an additional flat phantom part for the simplified performance check. The phantom set-up includes a cover, which prevents the evaporation of the liquid.



- ·Left hand
- ·Right hand
- ·Flat phantom

#### **Photo of Phantom SN1576**



Serial Number	Material	Length	Height
SN 1576 SAM	Vinylester, glass fiber reinforced	1000	500



#### 4.2.6 Device Holder

The DASY5 device holder has two scales for device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear openings). The plane between the ear openings and the mouth tip has a rotation angle of 65°. The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. This device holder is used for standard mobile phones or PDA"s only. If necessary an additional support of polystyrene material is used. Larger DUT"s (e.g. notebooks) cannot be tested using this device holder. Instead a support of bigger polystyrene cubes and thin polystyrene plates is used to position the DUT in all relevant positions to find and measure spots with maximum SAR values. Therefore those devices are normally only tested at the flat part of the SAM.

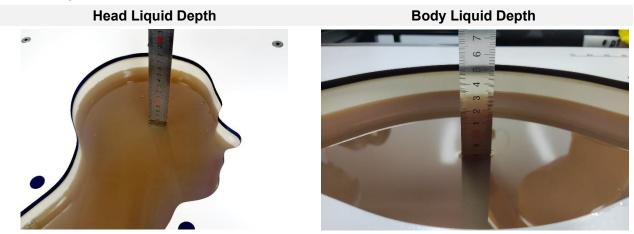


The positioning system allows obtaining cheek and tilting position with a very good accuracy. Incompliance with CENELEC, the tilt angle uncertainty is lower than 1°.



#### 4.2.7 Simulating Liquid

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 5%.



The following table gives the recipes for tissue simulating liquid.

TSL	Manufacturer / Model	Freq Range (MHz)	Main Ingredients
Head WideBand	SPEAG HBBL600- 10000V6	600-10000	Ethanediol, Sodium petroleum sulfonate, Hexylene Glycol / 2-Methyl-pentane-2.4- diol, Alkoxylated alcohol



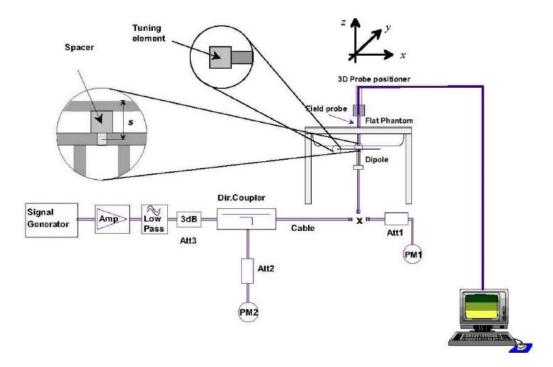
### 5 SYSTEM VERIFICATION

## 5.1 Purpose of System Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

## 5.2 System Check Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:





### **6 TEST POSITION CONFIGURATIONS**

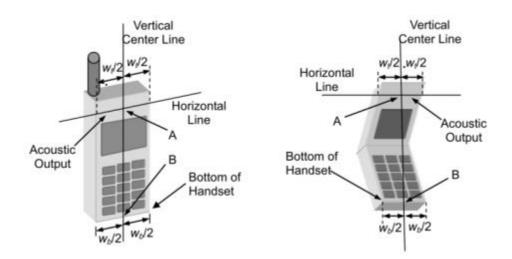
According to KDB 648474 D04 Handset, handsets are tested for SAR compliance in head, body-worn accessory and other use configurations described in the following subsections.

## 6.1 Head Exposure Conditions

Head exposure is limited to next to the ear voice mode operations. Head SAR compliance is tested according to the test positions defined in IEEE Std 1528-2013 using the SAM phantom illustrated as below.

#### 6.1.1 Two Imaginary Lines on the Handset

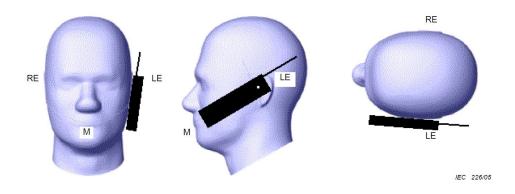
- (a) The vertical center line passes through two points on the front side of the handset the midpoint of the width w t of the handset at the level of the acoustic output, and the midpoint of the width w b of the bottom of the handset.
- (b) The horizontal line is perpendicular to the vertical centerline and passes through the center of the acoustic output. The horizontal line is also tangential to the face of the handset at point A.
- (c) The two lines intersect at point A. Note that for many handsets, point A coincides with the center of the acoustic output; however, the acoustic output may be located elsewhere on the horizontal line. Also note that the vertical center line is not necessarily parallel to the front face of the handset, especially for clamshell handsets, handsets with flip covers, and other irregularly shaped handsets.





#### 6.1.2 Cheek Position

- (a) To position the device with the vertical center line of the body of the device and the horizontal line crossing the center piece in a plane parallel to the sagittal plane of the phantom. While maintaining the device in this plane, align the vertical center line with the reference plane containing the three ear and mouth reference point (M: Mouth, RE: Right Ear, and LE: Left Ear) and align the center of the ear piece with the line RE-LE.
- (b) To move the device towards the phantom with the ear piece aligned with the line LE-RE until the phone touched the ear. While maintaining the device in the reference plane and maintaining the phone contact with the ear, move the bottom of the phone until any point on the front side is in contact with the cheek of the phantom or until contact with the ear is lost.

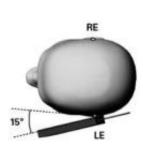


#### 6.1.3 Tilted Position

- (a) To position the device in the "cheek" position described above.
- (b) While maintaining the device the reference plane described above and pivoting against the ear, moves it outward away from the mouth by an angle of 15 degrees or until contact with the ear is lost.



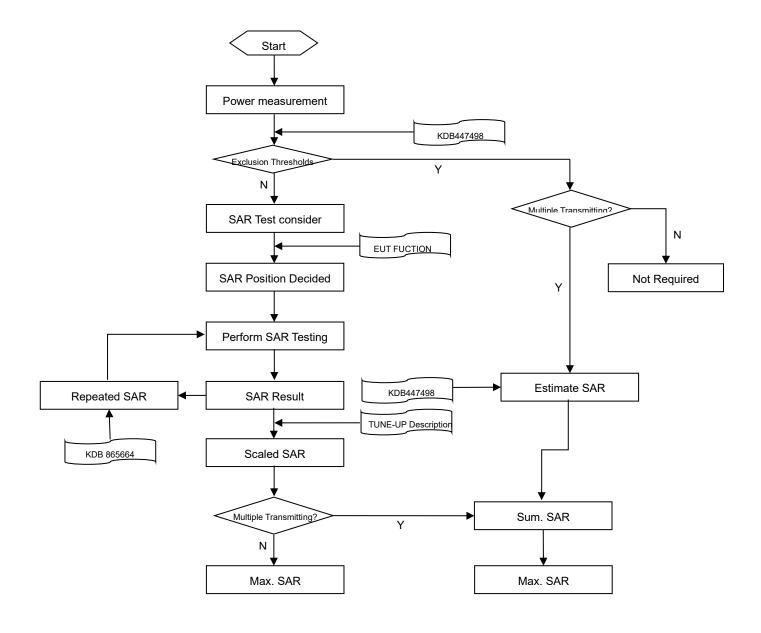






## 7 MEASUREMENT PROCEDURE

## 7.1 Measurement Process Diagram





## 7.2 SAR Scan General Requirement

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1 g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std 1528-2013.

			≤3GHz	>3GHz	
Maximum distance from (geometric center of prob		•	5±1 mm	½·δ·ln(2)±0.5 mm	
	-	s to phantom surface	30°±1° 20°±1°		
			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm When the x or y dimension of t	3–4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm	
Maximum area scan spat	tial resolution	n: Δx Area , Δy Area	measurement plane orientation the measurement resolution m		
Maximum zoom scan spa	atial resolutio	on: Δx Zoom , Δy Zoom	≤ 2 GHz: ≤ 8 mm 2 –3 GHz: ≤ 5 mm*	3–4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface  Minimum zoom scan spatial resolution, normal to phantom surface  Minimum zoom scan scan spatial resolution, normal to phantom surface	unifor	m grid: Δz Zoom (n)	≤ 5 mm	3–4 GHz: ≤ 4 mm 4–5 GHz: ≤ 3 mm 5–6 GHz: ≤ 2 mm	
spatial resolution, normal to phantom	graded	Δz Zoom (1): between 1st two points closest to phantom surface	≤ 4 mm	3–4 GHz: ≤ 3 mm 4–5 GHz: ≤ 2.5 mm 5–6 GHz: ≤ 2 mm	
cunace	grid	Δz Zoom (n>1): between subsequent points	≤ 1.5·Δz 2	Zoom (n-1)	
		x, y, z	≥30 mm	3–4 GHz: ≥ 28 mm 4–5 GHz: ≥ 25 mm 5–6 GHz: ≥ 22 mm	

#### Note:

- 1. δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.
- 2. \* When zoom scan is required and the reported SAR from the area scan based 1 g SAR estimation procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

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#### 7.3 Measurement Procedure

The following steps are used for each test position

- a. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface
- b. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
- c. Measurement of the SAR distribution with a grid of 8 to 16mm \* 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
- d. Around this point, a cube of 30 \* 30 \* 30 mm or 32 \* 32 \*32 mm is assessed by measuring 5 or 8 \* 5 or 8\*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

#### 7.4 Area & 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 over 10 g. Area scan and zoom scan resolution setting follows KDB 865664 D01v01r04 quoted below.

When the 1 g SAR of the highest peak is within 2 dB of the SAR limit, additional zoom scans are required for other peaks within 2 dB of the highest peak that have not been included in any zoom scan to ensure there is no increase in SAR.



## 8 CONDUCTED RF OUPUT POWER

### 8.1 Bluetooth

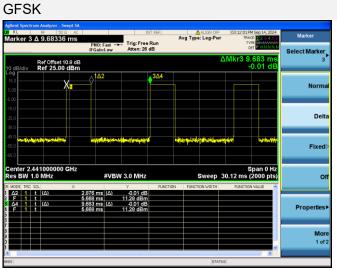
Mode		GFSK		π/4-DQPSK			
Channel	0	39	78	0	39	78	
Frequency (MHz)	2402	2441	2480	2402	2441	2480	
Conducted Power (dBm)	10.72	10.92	10.86	9.56	9.98	9.84	
Tune-Up Limit (dBm)	12.00	12.00	12.00	11.00	11.00	11.00	
SAR Test Require	No	Yes	No	No	No	No	
Mode		8-DPSK		/			
Channel	0	39	78	1	1	1	
Frequency (MHz)	2402	2441	2480	1	1	1	
Conducted Power (dBm)	8.65	9.16	8.80	1	1	1	
Tune-Up Limit (dBm)	10.00	10.00	10.00	1	1	1	
SAR Test Require	No	No	No	1	1	1	
Mode		BLE-1Mbps			BLE-2Mbps		
Channel	0	19	39	1	19	38	
Frequency (MHz)	2402	2440	2480	2404	2440	2478	
Conducted Power (dBm)	9.37	9.91	9.64	7.03	7.94	7.54	
Tune-Up Limit (dBm)	11.00	11.00	11.00	8.50	8.50	8.50	
SAR Test Require	No	Yes	No	No	No	No	

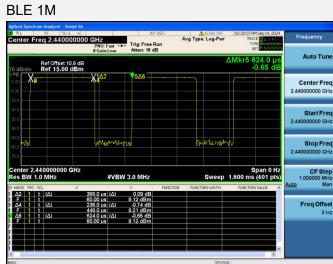
Note: Since Bluetooth BR and BLE-1Mbps mode is the maximum output power mode, SAR measurements were performed with test software using DH5 and BLE modulation, and SAR measurement is not required for the EDR and BLE-2Mbps. When the secondary mode is  $\leq \frac{1}{4}$  dB higher than the primary mode.



Note 1: The Bluetooth BT DH5 duty cycle is 29.7% as following figure, according to 2016 Oct. TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation. Note 2: The Bluetooth BLE 1M duty cycle is 62.18% as following figure, according to 2016 Oct. TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to 100% for Bluetooth reported SAR calculation.

#### **Duty Cycle**

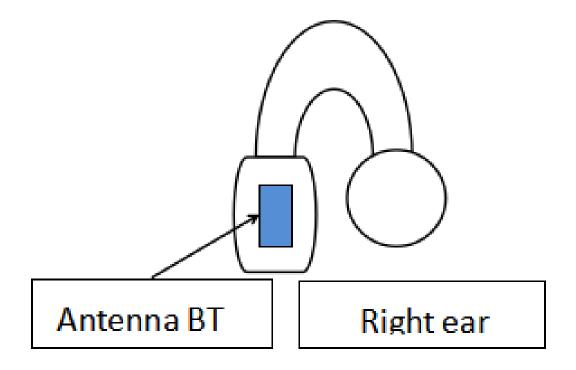






## 9 TEST EXCLUSION CONSIDERATION

### 9.1 Antenna Location Sketch



Antenna	Support Bands
Antenna BT	Bluetooth



### 9.2 SAR Test Consideration Table

According with FCC KDB 447498 D04, Appendix B, The SAR-based exemption formula applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold Pth (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). The following table shows the power threshold from 5mm to 50mm.

	Power Thresholds (mW)									
Fraguency	At separation	At separation	At separation	At separation	At separation					
Frequency	distance of	distance of	distance of	distance of	distance of					
(MHz)	≤5 mm	10 mm	15 mm	20 mm	25 mm					
300	39 mW 65 mW 88 mW		88 mW	110 mW	129 mW					
450	22 mW	44 mW	67 mW	89 mW	112 mW					
835	9 mW	25 mW	44 mW	66 mW	90 mW					
1900	3 mW	12 mW	26 mW	44 mW	66 mW					
2450 3 mW		10 mW	22 mW	38 mW	59 mW					
3600 2 mW		8 mW	18 mW	32 mW	49 mW					
5800	5800 1 mW 6 mW		14 mW 25 mW		40 mW					
	At separation	At separation	At separation	At separation	At separation					
Frequency	distance of	distance of	distance of	distance of	distance of					
(MHz)	30 mm	35 mm	40 mm	45 mm	50 mm					
300	148 mW	166 mW	184 mW	201 mW	217 mW					
450	135 mW	158 mW	180 mW	203 mW	226 mW					
835	116 mW	145 mW	175 mW	207 mW	240 mW					
1900	92 mW	122 mW	157 mW	195 mW	236 mW					
2450	83 mW	111 mW	143 mW	179 mW	219 mW					
3600	71 mW	96 mW	125 mW	158 mW	195 mW					
5800	58 mW	80 mW	106 mW	136 mW	169 mW					



#### 9.2.1 SAR Test Consideration

This host is an earphone, under normal use the RF exposure scenarios are shown in the table below:

RF exposure Position	RF exposure scenarios
Front Side	Body
Back Side	Body
Left Edge	Body
Right Edge	Body
Top Edge	Body
Bottom Edge	Body

#### Body RF exposure scenarios

Test Position Configurations	Mode	Bluetooth
Calculated I	Frequency (MHz)	2480
	Distance to User (mm)	5.00
	Max. Peak Power (dBm)	12.00
Front Side	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72
	SAR Test Required	Yes
	Distance to User (mm)	5.00
	Max. Peak Power (dBm)	12.00
Back Side	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72
	SAR Test Required	Yes
	Distance to User (mm)	5.00
	Max. Peak Power (dBm)	12.00
Left Edge	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72
	SAR Test Required	Yes
	Distance to User (mm)	5.00
	Max. Peak Power (dBm)	12.00
Right Edge	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72
	SAR Test Required	Yes
	Distance to User (mm)	5.00
	Max. Peak Power (dBm)	12.00
Top Edge	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72
	SAR Test Required	Yes
	Distance to User (mm)	5.00
Potton: Edica	Max. Peak Power (dBm)	12.00
Bottom Edge	Max. Peak Power (mW)	15.85
	Exclusion Threshold (mW)	2.72



|--|

#### Note:

- Maximum power is the source-based time-average power and represents the maximum RF output power including tuneup tolerance among production units
- 2. Per KDB 447498 D04, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
- 3. Per KDB 447498 D04, standalone SAR test exclusion threshold is applied; If the distance of the antenna to the user is < 5mm, 5mm is used to determine SAR exclusion threshold
- 4. Per KDB 447498 D04, for separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive), the threshold Pth (mW) is given by Following:

$$P_{th}(mW) = \begin{cases} ERP_{20cm}(d/20cm)^x & d \le 20cm \\ ERP_{20cm} & 20cm < d \le 40cm \end{cases}$$

where

$$x = -log_{10} \left( \frac{60}{ERP_{20cm} \sqrt{f}} \right)$$

- a. f(GHz) is the RF channel transmit frequency in GHz
- b. d is the separation distance (cm), The result is rounded to one decimal place for comparison
- c.  $ERP_{20cm}$  are determined by:

$$ERP_{20cm}(mW) = f(x) = \begin{cases} 2040f & 0.3GHz \le f < 1.5GHz \\ 3060 & 1.5GHz \le f \le 6GHz \end{cases}$$



## **10 TEST RESULT**

### 10.1 Bluetooth

Mode	Position	Dist. (mm)	Ch.	Freq. (MHz)	Power Drift (dB)	1 g Meas SAR (W/kg)	Meas. Power (dBm)	Max. tune-up power (dBm)	Scaling Factor	Duty cycle (%)	Duty cycle Factor	1g Scaled SAR (W/kg)	Meas. No.
Right Headse				T			40.00			00.70			
	Front Side	0	39	2441	-0.10	0.082	10.92	12.00	1.282	29.70	3.367	0.354	1#
	Back Side	0	39	2441	0.06	0.062	10.92	12.00	1.282	29.70	3.367	0.268	/
Bluetooth	Left Edge	0	39	2441	0.03	0.001	10.92	12.00	1.282	29.70	3.367	0.004	/
GFSK-DH5	Right Edge	0	39	2441	-0.08	0.058	10.92	12.00	1.282	29.70	3.367	0.250	/
	Top Edge	0	39	2441	-0.12	0.034	10.92	12.00	1.282	29.70	3.367	0.147	/
	Bottom Edge	0	39	2441	0.00	0.024	10.92	12.00	1.282	29.70	3.367	0.104	/
	Front Side	0	19	2440	0.03	0.043	9.91	11.00	1.285	62.18	1.608	0.089	/
	Back Side	0	19	2440	0.02	0.051	9.91	11.00	1.285	62.18	1.608	0.105	/
Bluetooth	Left Edge	0	19	2440	-0.02	0.001	9.91	11.00	1.285	62.18	1.608	0.002	/
BLE 1M	Right Edge	0	19	2440	0.00	0.042	9.91	11.00	1.285	62.18	1.608	0.087	/
	Top Edge	0	19	2440	0.05	0.001	9.91	11.00	1.285	62.18	1.608	0.002	/
	Bottom Edge	0	19	2440	-0.10	0.001	9.91	11.00	1.285	62.18	1.608	0.002	/



## 11 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  $\leq$  1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is  $\leq$  1.10, the highest SAR configuration for either head or body tissue-equivalent medium may be 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.
- 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.

Note: For 1g SAR, the highest measured 1g SAR is 0.08 < 0.80 W/kg, repeated measurement is not required.

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## 12 SIMULTANEOUS TRANSMISSION

Note: The product has only one antenna for Bluetooth, so simultaneous transmission evaluation is not required in this report.



## 13 TEST EQUIPMENTS LIST

Description	Manufacturer	Model	Serial No./Version	Cal. Date	Cal. Due
PC	Dell	N/A	N/A	N/A	N/A
Test Software	Speag	DASY5	DASY5 52.8.8.1222		N/A
2450MHz Validation Dipole	Speag	D2450V2	SN: 952	2024/05/07	2027/05/06
Data Acquisition Electronicsr	Speag	DAE4	SN: 1711	2024/03/18	2025/03/17
E-Field Probe	Speag	EX3DV4	SN: 7510	2024/06/25	2025/06/24
Signal Generator	R&S	SMB100A	177746	2024/04/24	2025/04/23
Power Meter	R&S	NRVD-B2	835843/014	2024/08/08	2025/08/07
Power Sensor	R&S	NRV-Z4	100381	2024/08/08	2025/08/07
Power Sensor	R&S	NRV-Z2	100211	2024/08/08	2025/08/07
Network Analyzer	Agilent	E5071C	MY46103472	2023/11/14	2024/11/13
Thermometer	Elitech	RC-4	EF5238001628	2023/10/09	2024/10/08
Thermometer	Elitech	RC-4HC	EF7239002652	2023/11/17	2024/11/16
Power Amplifier	SATIMO	6552B	22374	N/A	N/A
Dielectric Probe Kit	Speag	DAK3.5	SN: 1312	N/A	N/A
Phantom	Speag	SAM	SN: 1576	N/A	N/A
Attenuator	COM-MW	ZA-S1-31	1305003187	N/A	N/A
Directional coupler	AA-MCS	AAMCS-UDC	000272	N/A	N/A

Note: For dipole antennas, BALUN has adopted 3 years as calibration intervals, and on annual basis, every measurement dipole has been evaluated and is in compliance with the following criteria:

- 1. There is no physical damage on the dipole;
- 2. System validation with specific dipole is within 10% of calibrated value;
- 3. Return-loss in within 20% of calibrated measurement.
- 4. Impedance (real or imaginary parts) in within 5 Ohms of calibrated measurement.



## ANNEX A SIMULATING LIQUID VERIFICATION RESULT

The dielectric parameters of the liquids were verified prior to the SAR evaluation using a DAK3.5 Dielectric Probe Kit.

2004 20 40 11 1 2450 244 4 20 20 27 4 20 20 20 444 4 20	Date	Liquid Type	Fre. (MHz)	Temp. (°C)	Meas. Conductivity (σ) (S/m)	Meas. Permittivity (ε)	Target Conductivity (σ) (S/m)	Target Permittivity (ε)	Conductivity Tolerance (%)	Permittivity Tolerance (%)
2024.09.18   Head   2450   21.4   1.82   39.67   1.80   39.20   1.11   1.20	2024.09.18	Head	2450	21.4	1.82	39.67	1.80	39.20	1.11	1.20

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## ANNEX B SYSTEM CHECK RESULT

Comparing to the original SAR value provided by SPEAG, the validation data should be within its specification of 10 %(for 1 g).

Date	Liquid	Freq.	Power	Measured	Normalized SAR	Dipole SAR	Tolerance
	Туре	(MHz)	(mW)	SAR (W/kg)	(W/kg)	(W/kg)	(%)
2024.09.18 Head 2450 100 5.320 53.20 52.60 1.1						1.14	
Note: The tolerance limit of System validation ±10%.							



## System Performance Check Data (2450MHz)

Date: 2024.09.18

Communication System Band: D2450 (2450.0 MHz); Frequency: 2450 MHz; Duty Cycle: 1:1 Medium parameters used: f = 2450 MHz;  $\sigma$  = 1.821 S/m;  $\epsilon_r$  = 39.671;  $\rho$  = 1000 kg/m³

Phantom section: Flat Section

Ambient Temperature:22.5℃ Liquid Temperature:21.4℃

#### **DASY5** Configuration:

- Probe: EX3DV4 SN7510; ConvF(7.75, 7.75, 7.75); Calibrated: 2024.06.25;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1711; Calibrated: 2024.03.18
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1576
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

CW 2450/Area Scan (101x101x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm

Maximum value of SAR (interpolated) = 6.34 W/kg

CW 2450/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 58.01 V/m; Power Drift = 0.01 dB

Peak SAR (extrapolated) = 11.5 W/kg

SAR(1 g) = 5.32 W/kg; SAR(10 g) = 2.47 W/kg Maximum value of SAR (measured) = 6.11 W/kg

-4.41 -8.83 -13.24 -17.66

0 dB = 6.11 W/kg



### ANNEX C TEST DATA

#### Meas.1 Body Plane with Front Side 0mm on 39 Channel in Bluetooth mode

Date: 2024.09.18

Communication System Band: BT; Frequency: 2441 MHz; Duty Cycle: 1:3.367

Medium parameters used (interpolated): f = 2441 MHz;  $\sigma$  = 1.804 S/m;  $\epsilon_r$  = 39.873;  $\rho$  = 1000 kg/m<sup>3</sup>

Phantom section: Flat Section

Ambient Temperature:22.5℃ Liquid Temperature:21.4℃

#### DASY5 Configuration:

- Probe: EX3DV4 SN7510; ConvF(7.75, 7.75, 7.75); Calibrated: 2024.06.25;
- Sensor-Surface: 4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1711; Calibrated: 2024.03.18
- Phantom: SAM1; Type: QD000P40CD; Serial: TP:1576
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7331)

CH39/Area Scan (61x61x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 0.0695 W/kg

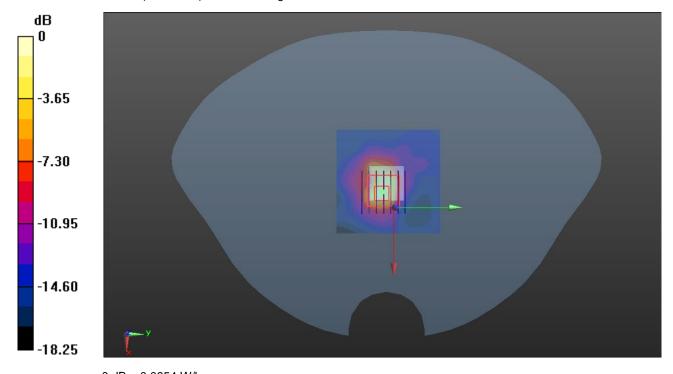
CH39/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 5.419 V/m; Power Drift = -0.10 dB

Peak SAR (extrapolated) = 0.322 W/kg

SAR(1 g) = 0.082 W/kg; SAR(10 g) = 0.026 W/kg

Maximum value of SAR (measured) = 0.0954 W/kg



0 dB = 0.0954 W/kg



## ANNEX D EUT EXTERNAL PHOTOS

Please refer the document "BL-SZ2490227-AW.pdf".

## ANNEX E SAR TEST SETUP PHOTOS

Please refer the document "BL-SZ2490227-AS-2.pdf".

## ANNEX F CALIBRATION REPORT

Please refer the document "BL-SZ2490227-AC.pdf".

### ANNEX G TUNE-UP PROCEDURE

Please refer the document "BL-SZ2490227-AT-2.pdf".

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