

# PERMISSIVE CHANGE

FCC 47 CFR § 20.19 ANSI C63.19-2011

For GSM/WCDMA/LTE Phone with BT, DTS/UNII a/b/g/n/ac & NFC

FCC ID: PY7-54264J

Report Number: 12371499-S2V2 Issue Date: 8/7/2018

Prepared for

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## **Revision History**

Rev.	Date	Revisions	Revised By
V1	8/6/2018	Initial Issue	
V2	8/7/2018	Updated Section 1 Note	Lance Fleischer

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### 1. Attestation of Test Results

Applicant Name	SONY MOBILE COMMUNICATIONS INC.
FCC ID	PY7-54264J
Applicable Standards	FCC 47 CFR § 20.19 ANSI C63.19-2011
HAC Rating	M4
Date Tested	7/10/2018
Test Results	Pass

**Note:** The proposed Permissive Change requires HAC RF Emission testing for LTE Bands 7 and 41 due to antenna gain differences from the original model. The RF Emissions results from the original filing can be found in FCC HAC RF report PY7-26828G. This report only contains the RF Emission results for the modified LTE Bands.

UL Verification Services Inc. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by UL Verification Services Inc. based on interpretations and/or observations of test results. Measurement Uncertainties were not taken into account and are published for informational purposes only. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

**Note:** The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL Verification Services Inc. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL Verification Services Inc. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government (NIST Handbook 150, Annex A). This report is written to support regulatory compliance of the applicable standards stated above.

Approved & Released By:	Prepared By:
A.	Lamythis
David Weaver	Lance Fleischer
Program Manager	Laboratory Engineer
UL Verification Services Inc	UL Verification Services Inc

## 2. Test Methodology

The tests documented in this report were performed in accordance with ANSI C63.19-2011 Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids and FCC Published procedures:

- KDB 285076 D01 HAC Guidance v05
- KDB 285076 D03 HAC FAQ v01
- TCB workshop updates

## 3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

47173 Benicia Street	47266 Benicia Street	
SAR Lab C	SAR Lab 2	
	SAR Lab 7	

UL Verification Services Inc. is accredited by NVLAP, Laboratory Code 200065-0.

# 4. Calibration and Uncertainty

## 4.1. Measuring Instrument Calibration

The measuring equipment utilized to perform the tests documented in this report has been calibrated in accordance with the manufacturer's recommendations, and is traceable to recognized national standards.

		<del>_</del>		
Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Synthezised Signal Generator	Agilent	N5181A	MY50140630	5/25/2019
Power Meter	HP	437B	3125U12345	8/10/2018
Power Meter	HP	437B	3125U11347	8/15/2018
Power Sensor	HP	8481A	1926A27048	8/10/2018
Power Sensor	HP	8481A	3318A92374	8/15/2018
Amplifier	MITEQ	AMF-4D-00400600-50-30P	1795092	N/A
Bi-directional coupler	Werlatone, Inc.	C8060-102	2141	N/A
DC Power Supply	BK Precision	1611	215-02292	N/A
Data Acquisition Electronics (SAR Lab 7)	SPEAG	DAE4	1547	5/3/2019
E-Field Probe*	SPEAG	EF3DV3	4041	3/18/2019
Calibration Dipole	SPEAG	CD2600V3	1014	8/18/2018
Radio Communication Tester	R &S	CMW 500	147543-Bg	2/19/2019

#### Note(s):

\*: According to SPEAG's Technical Report, "MIF Verification", Doc # TR-FB-12.09.04-1, issued date: 9/4/2012. E-field probes are calibrated with specified uncertainty according to ISO 17025 as described in their calibration certificate. The MIF according to the definition in ANSI C63.19 is specific for a modulation and can therefore be used as a constant value if the probe has been PMR calibrated.

#### **Measurement Uncertainty** 4.2.

Error Description	Uncertainty value (±%)	Probe Dist.	Div.	(Ci) E	Std. Unc.(±%) E
Measurement System					
Probe Calibration	5.1	N	1	1	5.1
Axial Isotropy	4.7	R	1.732	1	2.7
Sensor Displacement	16.5	R	1.732	1	9.5
Boundary Effects	2.4	R	1.732	1	1.4
Phantom Boundary Effects	7.2	R	1.732	1	4.1
Linearity	4.7	R	1.732	1	2.7
Scaling to PMR Calibration	10.0	R	1.732	1	5.8
System Detection Limit	1.0	R	1.732	1	0.6
Readout Electronics	0.3	N	1	1	0.3
Response Time	0.8	R	1.732	1	0.5
Integration Time	2.6	R	1.732	1	1.5
RF Ambient Conditions	3.0	R	1.732	1	1.7
RF Reflections	12.0	R	1.732	1	6.9
Probe Positioner	1.2	R	1.732	1	0.7
Probe Positioning	4.7	R	1.732	1	2.7
Extrapolation and Interpolation	1.0	R	1.732	1	0.6
Test sample Related					
Test Positioning Vertical	4.7	R	1.732	1	2.7
Test Positioning Lateral	1.0	R	1.732	1	0.6
Device Holder and Phantom	2.4	R	1.732	1	1.4
Phantom and Setup Related					
Phantom Thickness	2.4	R	1.732	1	1.4
Combined Std. Uncertainty	16.3				
Expanded Std. Uncertainty on Power (Cov	32.6				
Expanded Std. Uncertainty on Field	16.3				
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Notesfor table

<sup>1.</sup> N - Nomal

<sup>2.</sup> R - Rectangular

Div. - Divisor used to obtain standard uncertainty
 Ci - is te sensitivity coefficient

## 5. System Specifications

E-field measurements are performed using the DASY52 automated dosimetric assessment system. The DASY52 is made by Schmid & Partner Engineering AG (SPEAG) in Zurich, Switzerland.

The DASY52 HAC Extension consists of the following parts:

#### **Test Arch Phantom**

The specially designed Test Arch allows high precision positioning of both the device and any of the validation dipoles.

#### **EF3DV3 Isotropic E-Field Probe**

Construction: One dipole parallel, two dipoles normal to probe axis

Interleaved sensors

Built-in shielding against static charges

PEEK enclosure material

Calibration: In air from 100 MHz to 3.0 GHz (absolute accuracy ±6.0%, k=2)

ISO/IEC 17025 calibration service available.

Frequency: 40 MHz - > 6 GHz (can be extended to < 20 MHz);

Linearity: ±0.2 dB (100 MHz – 3 GHz)

Directivity:  $\pm$  0.2 dB in air (rotation around probe axis)

± 0.4 dB in air (rotation normal to probe axis)

Dynamic Range: 2 V/m to > 1000 V/m; Linearity: ± 0.2 dB

Dimensions: Overall length: 337 mm (Tip: 20 mm)

Tip diameter: 3.9 mm (Body: 12 mm)

Distance from probe tip to dipole centers: 1.5 mm

Sensor displacement to probe's calibration point: <0.7 mm

Application: General near-field measurements up to 6 GHz

HAC measurements up to 6 GHz Field component measurements Fast automatic scanning in phantoms

## 6. System Validation

The test setup was validated when first configured and verified periodically thereafter to ensure proper function. The procedure provided in this section is a validation procedure using dipole antennas for which the field levels were computed by numeric modeling.

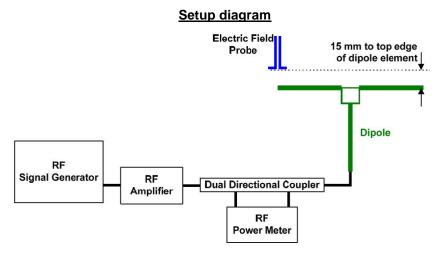
#### Procedure:

Place a dipole antenna meeting the requirements given in ANSI C63.19 in the normally occupied by the WD.

The dipole antenna serves as a known source for an electrical and magnetic output. Position the E-field probe so that the following occurs:

- The probes and their cables are parallel to the coaxial feed of the dipole antenna
- The probe cables and the coaxial feed of the dipole antenna approach the measurement area from opposite directions
- The center point of the probe element(s) is 15 mm from the closest surface of the dipole elements.

Scan the length of the dipole with the E-field probe and record the two maximum values found near the dipole ends. Average the two readings and compare the reading to the expected value in the calibration certificate or the expected value in this standard.



## 6.1. System Validation Results

				Max. measured from		Average	Target (V/m)	Deviation	Plot
SAR Lab	Date	Dipole Type_Serial #_Freq.	Dipole Cal. Due Data	above high end (V/m)	above low end (V/m)	max. above arm (V/m)	(From SPEAG)	(note 1) ± %	No.
7	7/10/2018	CD2600V3_SN:1014_(2600 MHz)	8/18/2018	92.88	98.99	95.94	87.30	9.89	1

#### Notes:

- 1) Delta (Deviation) % = 100 \* (Measured value minus Target value) divided by the Target value. Deltas within ±25% are acceptable, of which 12% is deviation and 13% is measurement uncertainty.
- The maximum E-field or were evaluated and compared to the target values provided by SPEAG in the calibration certificate of specific dipoles.
- Please refer to the appendix for detailed measurement data and plots.

## 7. Average Antenna Input Power & Evaluation for Low-power Exemption

An RF air interface technology of a device is exempt from testing when its average antenna input power plus its MIF is ≤17 dBm for any of its operating modes. If a device supports multiple RF air interfaces, each RF air interface shall be evaluated individually.

Air-Interface	Average Antenna Input Power (dBm) <sup>1</sup>	Worst Case MIF (dB)	Input Power plus its MIF (dBm)	HAC Tested
LTE Band 7	20.50	-9.76	10.74	No
LTE Band 41	24.50	-1.44	23.06	Yes

#### Note(s):

- 1. Max tune-up limit
- 2. This report only contains RFE test results for the modified LTE Bands. The RF Emissions results for all technologies can be found in the original filling under FCC HAC RF report PY7-26828G

## 8. Device Under Test

Normal operation	Held to head				
Back Cover	The Back Cover is not removable				
	S/N	IMEI	Notes		
Test sample information	BH94001ZD5	004402458822362	HAC LTE		

# 8.1. Air Interfaces and Operating Mode

Air Interface	Bands (MHz)	Туре	C63.19 Tested	Simultaneous Transmitter	Over-The-Top (OTT)	GSM 1900 MHz Power Reduction
	850					NA
GSM	1900	VO	No	Wi-Fi and BT	NA	No
	GPRS/EDGE	VD	No	Wi-Fi and BT	Yes	NA
	850					
W-CDMA	1700	VO	No <sup>1</sup>	Wi-Fi and BT	NA	NA
(UNTS)	1900					
	HSPA	VD	No	Wi-Fi and BT	Yes	NA
	700		No <sup>1</sup>	Wi-Fi and BT	Yes	
	850					NA
LTE - FDD	1700	VD				
	1900					
	2500					
LTE - TDD	2600	VD	Yes <sup>2</sup>	Wi-Fi and BT	Yes	NA
Wi-Fi	2450	VD	No	WWAN and BT	Yes	NA
	5200 (U-NII-1)					
	5300 (U-NII-2A)				Yes	NA
Wi-Fi	5500 (U-NII-2C)	VD	No <sup>1</sup>	WWAN and BT		
	5800 (U-NII-3)					
ВТ	2450	DT	NA	WWAN and Wi-Fi	NA	NA
DT: Digital	Cellular Voice Service Transport only (no voice	•		Note: 1. Evaluated for MIF and lov 2. This report only contains Bands. The RF Emission	RFE test results for t	

VD: IP Voice Service over Digital Transport

BT: Bluetooth

 This report only contains RFE test results for the modified LTE Bands. The RF Emissions results for all technologies can be found in the original filling under FCC HAC RF report for PY7-26828G

## 9. Modulation Interference Factor (MIF)

The HAC Standard ANSI C63.19 defines a new scaling using the Modulation Interference Factor (MIF) which replaces the need for the Articulation Weighting Factor (AWF) during the evaluation and is applicable to any modulation scheme.

The Modulation Interference factor (MIF, in dB) is added to the measured average E-field (in dBV/m) and converts it to the RF Audio Interference level (in dBV/m). This level considers the audible amplitude modulation components in the RF E-field. CW fields without amplitude modulation are assumed to not interfere with the hearing aid electronics. Modulations without time slots and low fluctuations at low frequencies have low MIF values, TDMA modulations with narrow transmission and repetition rates of few 100 Hz have high MIF values and give similar classifications as ANSI C63.19.

#### Definitions

E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the "indirect" measurement method according to ANSI C63.19 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by probe modulation response (PMR) calibration in order to not overestimate the field reading.

The evaluation method or the MIF is defined in ANSI C63.19 section D.7. An RMS demodulated RF signal is fed to a spectral filter (similar to an A weighting filter) and forwarded to a temporal filter acting as a quasi-peak detector. The averaged output of these filtering is called to a 1 kHz 80% AM signal as reference. MIF measurement requires additional instrumentation and is not well suited for evaluation by the end user with reasonable uncertainty It may alternatively be determined through analysis and simulation, because it is constraint and characteristic for a communication signal. DASY52 uses well defined signals for PMR calibration. The MIF of these signals has been determined by simulation and is automatically applied.

MIF values were not tested by a probe or as specified in the standards but are based on analysis provided by SPEAG for all the air interfaces (GSM, WCDMA, CDMA, LTE). The data included in this report are for the worst case operating modes. The UIDs used are listed below:

UID	Communication System Name	MIF (dB)
10021-DAB	GSM-FDD (TDMA, GMSK)	3.63
10011-CAB	UMTS-FDD (WCDMA)	-27.23
10170-CAB	LTE-FDD (SC-FDMA, 1 RB, 20 MHz, 16QAM)	-9.76
10182-CAB	LTE-FDD (SC-FDMA, 1 RB, 15 MHz, 16QAM)	-9.76
10176-CAB	LTE-FDD (SC-FDMA, 1 RB, 10 MHz, 16QAM)	-9.76
10178-CAB	LTE-FDD (SC-FDMA, 1 RB, 5 MHz, 16QAM)	-9.76
10173-CAB	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 16QAM)	-1.44
10061-CAA	IEEE 802.11b WiFi 2.4 GHz (DSSS, 11 Mbps)	-2.02
10077-CAA	IEEE 802.11g WiFi 2.4 GHz (DSSS/OFDM, 54 Mbps)	0.12
10069-CAA	IEEE 802.11a/n WiFi 5 GHz (OFDM, 54 Mbps)	-3.15
10030-CAA	IEEE 802.15.1 Bluetooth (GFSK, DH1)	1.02

A PMR calibrated probe is linearized for the selected waveform over the full dynamic range within the uncertainty specified in its calibration certificate. E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the \indirect" measurement method according to ANSI C63.19 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by PMR calibration in order to not overestimate the field reading.

The MIF measurement uncertainty is estimated as follows, for modulation frequencies from slotted waveforms with fundamental frequency and at least 2 harmonics within 10 kHz:

- 0.2 dB for MIF -7 to +5 dB,
- 0.5 dB for MIF -13 to +11 dB
- 1 dB for MIF > -20 dB

#### 10. HAC RF Emissions Test Procedure

The following are step-by-step test procedures.

- a) Confirm proper operation of the field probe, probe measurement system and other instrumentation and the positioning system.
- b) Position the WD in its intended test position.
- c) Set the WD to transmit a fixed and repeatable combination of signal power and modulation characteristic that is representative of the worst case (highest interference potential) encountered in normal use. Transiently occurring start-up, changeover, or termination conditions, or other operations likely to occur less than 1% of the time during normal operation, may be excluded from consideration.
- d) The center sub-grid shall be centered on the T-Coil mode perpendicular measurement point or the acoustic output, as appropriate. Locate the field probe at the initial test position in the 50 mm by 50 mm grid, which is contained in the measurement plane, refer to illustrated in Figure 1. If the field alignment method is used, align the probe for maximum field reception.
- e) Record the reading at the output of the measurement system
- f) Scan the entire 50 mm by 50 mm region in equally spaced increments and record the reading at each measurement point. The distance between measurement points shall be sufficient to assure the identification of the maximum reading.
- g) Identify the five contiguous sub-grids around the center sub-grid whose maximum reading is the lowest of all available choices. This eliminates the three sub-grids with the maximum readings. Thus, the six areas to be used to determine the WD's highest emissions are identified.
- h) Identify the maximum reading within the non-excluded sub-grids identified in step g).
- i) Convert the highest field reading within identified in step h) to RF audio interference level, in V/m, by taking the square root of the reading and then dividing it by the measurement system transfer function, established in 5.5.1.1 Convert this result to dB(V/m) by taking the base-10 logarithm and multiplying by 20.
  - Indirect measurement method
  - Replacing step i), the RF audio interference level in dB (V/m) is obtained by adding the MIF (in dB) to the maximum steady-state rms field-strength reading, in dB (V/m), from step h). Use this result to determine the category rating
- j) Compare this RF audio interference level with the categories in Clause 8 (ANSI C63.19) and record the resulting WD category rating
- k) For the T-Coil mode M-rating assessment, determine whether the chosen perpendicular measurement point is contained in an included sub-grid of the first scan. If so, then a second scan is not necessary. The first scan and resultant category rating may be used for the T-Coil mode M rating.
  - Otherwise, repeat step a) through step i), with the grid shifted so that it is centered on the perpendicular measurement point. Record the WD category rating.

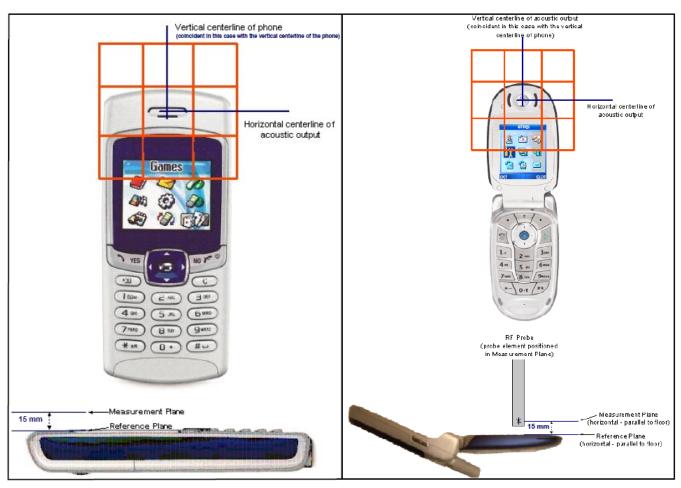


Figure 1 - WD reference and plane for RF emission measurements

#### Test flowchart Per ANSI-PC63.19 2011

Confirm proper operation of probes and instrumentation

- Position WD
- Configure WD TX operation

Per 5.4.1.2 (1-3)

- Initialize field probe
- Scan Area

Per 5.4.1.2 (4-6)

- > Identify exclusion area.
- Rescan or reanalyze open area to determine maximum
- Direct method: Record RF Audio Interference Level, in dB(V/m)
- Indirect method: Add the MIF to the maximum steady state rms field strength and record RF Audio Interference Level, in dB(V/m)

Per 5.4.1.2 (7-9) & 5.4.1.3

Identify and record the category

Per 5.4.1.2 (9-10)

## 11. RF Emissions Measurement Criteria

WD RF audio interference level caterories in logarithmic units

	E-field emissions			
Emission Categories	< 960 MHz	> 960 MHz		
Category M1	50 to 55 dB (V/m)	40 to 45 dB (V/m)		
Category M2	45 to 50 dB (V/m)	35 to 40 dB (V/m)		
Category M3	40 to 45 dB (V/m)	30 to 35 dB (V/m)		
Category M4	<40 dB (V/m)	<30 dB (V/m)		

# 12. HAC (RF Emissions) Test Results

MIF values were not tested by a probe or as specified in the standards but are based on analysis provided by SPEAG for the following User Identifiers and air interfaces.

The data included in this report are for the modified LTE bands. Refer to Appendix D and G for the MIF vales that represent the worst case operation modes.

Air-Interface	Ch. No.	Freq. (MHz)	Results* (dB V/m)	Results plus 0.2dB uncertaninty (dB V/m)	Margin (dB)	M-Rating	Plots Page #
LTE-TDD Band 41	39750	2506.00	13.79	13.99	16.01	M4	1
	40185	2549.50	14.31	14.51	15.49	M4	2
	40620	2593.00	14.75	14.95	15.05	M4	3
	41055	2636.50	15.73	15.93	14.07	M4	4
	41490	2680.00	15.46	15.66	14.34	M4	5

#### Note(s)

<sup>\*:</sup> Measured Audio Interference level in dB (V/m): indirect method (max rms field strength Plus MIF)

Date: 7/11/2018

#### 12.1. Worst Case RF Emission Test Plot

Test Laboratory: UL Verification Services Inc. SAR Lab 7

#### **HAC-RF Emission**

Communication System: UID 10173 - CAC, LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM); Frequency: 2636.5 MHz; Duty

Cycle: 1:8.87156

Phantom section: RF Section

DASY5 Configuration:

- Probe: ER3DV6 SN2509; ConvF(1, 1, 1) @ 2636.5 MHz; Calibrated: 5/22/2018
- Sensor-Surface: (Fix Surface)
- Electronics: DAE4 Sn1547; Calibrated: 5/3/2018
- Phantom: HAC Test Arch with AMCC; Type: SD HAC P01 BB
- Measurement SW: DASY52, Version 52.10 (1); SEMCAD X Version 14.6.11 (7439)

## LTE Band 41 E-Field measurement/16QAM\_RB 1/50\_ch 41055/Hearing Aid

Compatibility Test (101x101x1): Interpolated grid: dx=0.5000 mm, dy=0.5000 mm

Device Reference Point: 0, 0, -6.3 mm

Reference Value = 5.441 V/m; Power Drift = -0.22 dB

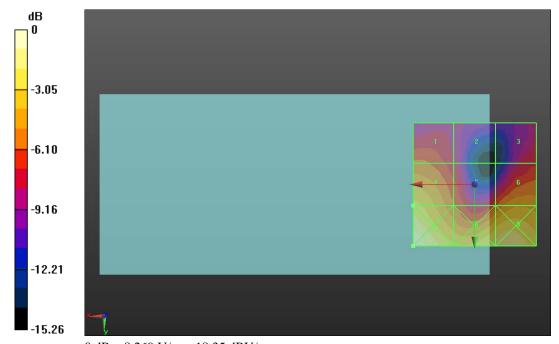
Applied MIF = -1.44 dB

RF audio interference level = 15.73 dBV/m

Emission category: M4

MIF scaled E-field

Grid 1 <b>M4</b>	Grid 2 <b>M4</b>	Grid 3 <b>M4</b>
12.56 dBV/m	10.49 dBV/m	11.02 dBV/m
Grid 4 <b>M4</b>	Grid 5 <b>M4</b>	Grid 6 <b>M4</b>
15.73 dBV/m	12.4 dBV/m	14.16 dBV/m
Grid 7 <b>M4</b>	Grid 8 <b>M4</b>	Grid 9 <b>M4</b>
18.35 dBV/m	17.11 dBV/m	17.41 dBV/m



0 dB = 8.269 V/m = 18.35 dBV/m

## **Appendixes**

## Refer to separated files for the following appendixes

12371499-S2V1 HAC\_RF\_App A Setup Photo

12371499-S2V1 HAC\_RF\_App B System Validation Plots

12371499-S2V1 HAC\_RF\_App C RF Emissions Test Plots

12371499-S2V1 HAC\_RF\_App D MIF Attestation Letter

12371499-S2V1 HAC\_RF\_App E Probe Cal. Certificate

12371499-S2V1 HAC\_RF\_App F Dipole Cal. Certificates

12371499-S2V1 HAC\_RF\_App G UID Specification

**END OF REPORT**