

Test Report Serial Number: Test Report Date: Project Number: 45461720 R1.0 14 March 2022 1579

# **SAR Test Report - New Application**

Applicant:



Garmin International Inc. 1200 East 151 St. Olathe, KS, 66062 USA

י ורי	
J 11.	

IPH-04211

Product Model Number / HVIN

A04211

Maximum <u>reported</u> SAR						
FCC/ISED	Body (DTS):	0.58				
General P	1.60	W/kg				
FCC/ISED	Extremity (DTS):	0.27	ww/kg			
General P	op. Limit:	4.00				

IC Registration Number

1792A-04211	
Product Name / Pl	MN
A04211	

In Accordance With:

### FCC 47 CFR §2.1093

Radiofrequency Radiation Exposure Evaluation: Portable Devices

### **Health Canada Safety Code 6**

Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3kHz to 300GHz

Approved By:

Ben Hewson, President

Celltech Labs Inc. 21-364 Lougheed Rd. Kelowna, BC, V1X7R8 Canada







Industry Canada



Test Lab Certificate: 2470.01

IC Registration 3874A

FCC Registration: CA3874

This report shall not be reproduced in any form without the expressed written consent of Celltech Labs Inc.

© 2022 Celltech Labs Inc,



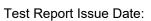
## **Table of Contents**

1.0 DOCUMENT CONTROL	4
2.0 CLIENT AND DEVICE INFORMATION	5
3.0 SCOPE OF EVALUATION	6
4.0 NORMATIVE REFERENCES	7
5.0 STATEMENT OF COMPLIANCE	8
6.0 SAR MEASUREMENT SYSTEM	9
7.0 RF CONDUCTED POWER MEASUREMENT	10
TABLE 7.1 CONDUCTED POWER MEASUREMENTS, WIFI	
8.0 NUMBER OF TEST CHANNELS (Nc)	12
TABLE 8.1 NUMBER OF TEST CHANNELS	12
9.0 ACCESSORIES EVALUATED	13
Table 9.1 Manufacturer's Accessory List	13
10.0 SAR MEASUREMENT SUMMARY	14
TABLE 10.1: MEASURED RESULTS – BODY/EXTREMITY	14
11.0 SCALING OF MAXIMUM MEASURE SAR	15
TABLE 11.1 SAR SCALING 1G  TABLE 11.1 SAR SCALING 1G (CONT.)  TABLE 11.2 SAR SCALING 10G  TABLE 11.2 SAR SCALING 10G (CONT.)	
12.0 SAR EXPOSURE LIMITS	
Table 12.1 Exposure Limits	19
13.0 DETAILS OF SAR EVALUATION	20
13.1 Day Log	
13.2 DUT SETUP AND CONFIGURATION	
13.3 DUT POSITIONING	
13.5 FLUID DIELECTRIC AND SYSTEMS PERFORMANCE CHECK	
13.6 SCAN RESOLUTION 100MHz TO 2GHz	
13.7 SCAN RESOLUTION 2GHz TO 3GHz	
14.0 MEASUREMENT UNCERTAINTIES	
Table 14.1 Measurement Uncertainty	
Table 14.2 Calculation of Degrees of Freedom	
15.0 FLUID DIELECTRIC PARAMETERS	27
TABLE 15.1 FLUID DIELECTRIC PARAMETERS 2450MHz HEAD TSL	27
16.0 SYSTEM VERIFICATION TEST RESULTS	29
TABLE 16.1 SYSTEM VERIFICATION RESULTS 2450MHz HEAD TSL	29

## Test Report Issue Date:

45461720 R1.0 14 March 2022

17.0 SYSTEM VALIDATION SUMMARY	30
Table 17.1 System Validation Summary	30
18.0 MEASUREMENT SYSTEM SPECIFICATIONS	31
Table 18.1 Measurement System Specifications	31
19.0 TEST EQUIPMENT LIST	
Table 19.1 Equipment List and Calibration	33
20.0 FLUID COMPOSITION	34
TABLE 20.1 FLUID COMPOSITION 150MHz HEAD TSL	34
APPENDIX A – SYSTEM VERIFICATION PLOTS	35
APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR	37
APPENDIX C - SETUP PHOTOS	39
APPENDIX D – DUT AND ACCESSORY PHOTOS	43
APPENDIX E – PROBE CALIBRATION	44
APPENDIX F – DIPOLE CALIBRATION	45
APPENDIX G - PHANTOM	46



Celltech
Testing and Engineering Services Lab

45461720 R1.0 14 March 2022

## 1.0 DOCUMENT CONTROL

	Revision History							
Sam	ples Tested By:	s Tested By: Trevor Whillock		revor Whillock Date(s) of Evaluation:				
Report Prepared By:		Trevor Whillock	Re	port Reviewed By:	Art Voss			
Report	Description of Revision		Revised	Revised	Revision Date			
Description of Revision		ription of Revision	Section	Ву	Revision Date			
0.1		Draft	n/a	Trevor Whillock	09 March 2022			
0.2	Revised for Crest Factor		10, 11	Art Voss	14 March 2022			
1.0	Initial Release		n/a	Art Voss	14 March 2022			



## 2.0 CLIENT AND DEVICE INFORMATION

Client Information					
Applicant Name	Garmin International Inc.				
	1200 East 151 St				
Applicant Address	Olathe, KS, 66062				
	USA				
	DUT Information				
Davida Idantifica(a)	FCC ID: IPH-04211				
Device Identifier(s):	ISED ID: 1792A-04211				
Device Model(s) / HVIN:	A04211				
Device Marketing Name / PMN:	A04211				
Test Sample Serial No.:	Conducted:3390944711 OTA: 3390944608				
Device Type:	Low Power Digital Device Transmitter				
FCC Equipment Class:	Digital Transmission System (DTS), Low Power Communication Device Transmitter (DXX)				
ISED Equipment Class:	RSS-247, RSS-210				
Transmit Francisco Dances	WiFi (DTS): 2412-2462MHz				
Transmit Frequency Range:	BT BLE/ANT(DXX): 2402-2480MHz				
	WiFi (DTS): 11.76dBm				
Manuf. Max. Rated Output Power:	ANT GFSK (DXX): 70.7 db <sub>µ</sub> V				
	BT BLE GMSK (DXX): 89.6 dbµV				
Antenna Type and Gain:*	WiFi/BT BLE/ANT: 1 dBi				
Modulation:	WiFi: DSSS, OFDM, CCK, MCS0-7				
Modulation:	BLE: GMSK				
Modulation:	ANT: GFSK				
DUT Power Source:	4.35 VDC Internal Li-lon Battery				
DUT Dimensions [LxWxH]	L x W x H: 43mm x 15.25mm x 20mm				
Deviation(s) from standard/procedure:	None				
Modification of DUT:	None				

<sup>\*</sup> Information on antenna gain provided by applicant.



Test Report Issue Date:

45461720 R1.0 14 March 2022

### 3.0 SCOPE OF EVALUATION

The A04211 is a Low Power Digital Transmitter that may be mounted or handheld, with a Wi-Fi transceiver that is capable of operating in the 2.4GHz WiFi/BLE/ANT frequency bands. The device does not operate with simultaneous Wi-Fi and BLE/ANT transmissions. The device is intended for General Population Use. The product operates from an internal proprietary Li-ion rechargeable battery which can be connected to a compliant USB interface port, AC or DC adapter for charging. Test samples provided by the manufacturer were capable of transmitting at select frequencies and modulations preset by the manufacturer. An additional antenna modification was prepared for one sample allowing the ability to connect test equipment for antenna port conducted power analysis.

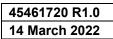
#### Application:

This is an application for a new device certification.

#### Scope:

The scope of this evaluation limited to the evaluation of SAR for intended and non-intended applications. It will include evaluation of the 2.4 GHz transmitters for all required RF exposure configurations including Extremity and Body Configuration as the device may be operational while in hand or on person (ie. pocket).

The Test Plan developed for this evaluation is based on the required test channels and configurations which produced the highest worst case SAR and where applicable, SAR test reduction and/or SAR test exclusion may be utilized. The DUT was evaluated for SAR at the maximum tune up tolerance and conducted output power level, preset by the manufacturer and in accordance with the procedures described in IEC/IEEE 62209-1528, IEC 62209-1, IEC 62209-2, FCC KDB 447498 and ISED RSS-102.





## **4.0 NORMATIVE REFERENCES**

	Normative References*
ANSI / ISO 17025:2005	General Requirements for competence of testing and calibration laboratories
FCC CFR Title 47 Part 2	Code of Federal Regulations
Title 47:	Telecommunication
Part 2.1093:	Radiofrequency Radiation Exposure Evaluation: Portable Devices
Health Canada	
Safety Code 6 (2015)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3kHz to 300GHz
Industry Canada Spectrum	Management & Telecommunications Policy
RSS-102 Issue 5:	Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
IEEE International Committee	ee on Electromagnetic Safety
IEEE 1528-2013:	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
IEC International Standard	
IEC 62209-2 2010	Human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 2
IEC International Standard /	IEEE International Committee on Electromagnetic Safety
IEC/IEEE 62209-1528	Measurement procudeure for the assessment of sepcific absorption rate of human expoure to radio frequency fields from hand-held and body-mounted wireless communication devices -
	Part 1528; Human models, insturmentation, and procedures (Frequency range of 4 MHz to 10 GHz)
FCC KDB	
KDB 865664 D01v01r04	SAR Measurement Requirements for 100MHz to 6GHz
FCC KDB	
KDB 447498 D01v06	Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies
* When the issue number	or issue date is omitted, the latest version is assumed.

Test Report Issue Date:

45461720 R1.0 14 March 2022

### **5.0 STATEMENT OF COMPLIANCE**

This measurement report demonstrates that samples of the product model(s) were evaluated for Specific Absorption Rate (SAR) on the date(s) shown, in accordance with the Measurement Procedures cited and were found to comply with the Standard(s) Applied based on the Exposure Limits of the Use Group indicated for which the product is intended to be used.

Applicant:	Model / HVIN:	
Garmin International Inc.	A04211	
Standard(s) Applied:	Measurement Procedure(s):	
FCC 47 CFR §2.1093	FCC KDB 865664, FCC KDB 447498, FC	C KDB 248227
Health Canada's Safety Code 6	Industry Canada RSS-102 Issue 5	
	IEC/IEEE Standard 62209-1528, IEC 6220	9-2
Reason For Issue:	Use Group:	Limits Applied:
x New Certification	x General Population / Uncontrolled	x 1.6W/kg - 1g Volume
Class I Permissive Change		8.0W/kg - 1g Volume
Class II Permissive Change	Occupational / Controlled	x 4.0W/kg - 10g Volume
Reason for Change:		Date(s) Evaluated:
		February 28, 2022

The results of this investigation are based solely on the test sample(s) provided by the applicant which was not adjusted, modified or altered in any manner whatsoever except as required to carry out specific tests or measurements. A description of the device, operating configuration, detailed summary of the test results, methodologies and procedures used during this evaluation, the equipment used and the various provisions of the rules are included in this test report.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.

Trevor Whillock
Test Lab Engineer
Celltech Labs Inc.

09 March 2022 Date



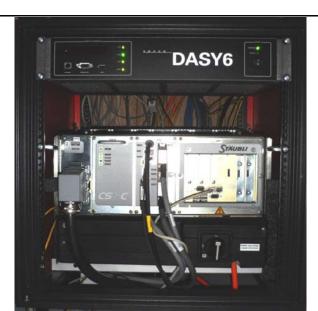
### **6.0 SAR MEASUREMENT SYSTEM**

## **SAR Measurement System**

Celltech Labs Inc. SAR measurement facility employs a Dosimetric Assessment System (DASY™) manufactured by Schmid & Partner Engineering AG (SPEAG™) of Zurich, Switzerland. The DASY6 measurement system is comprised of the measurement server, a robot controller, a computer, a near-field probe, a probe alignment sensor, an Elliptical Planar Phantom (ELI) phantom and a specific anthropomorphic mannequin (SAM) phantom for Head and/or Body SAR evaluations. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF). A cell controller system contains the power supply, robot controller and a teach pendant (Joystick) to control the robot's servo motors. The Staubli robot is connected to the cell controller to allow software manipulation of the robot. A data acquisition electronic (DAE) circuit performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. is connected to the Electro-optical coupler (EOC). The EOC performs the conversion from the optical form the DAE to digital electronic signal and transfers data to the DASY6 measurement server. The DAE4 utilizes a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gainswitching multiplexer, a fast 16-bit AD-converter, a command decoder and a control logic unit. Transmission to the DASY6 measurement server is accomplished through an optical downlink for data and status information and an optical uplink for commands and clock lines. The mechanical probe-mounting device includes two different sensor systems for frontal and sidewise probe contacts. The sensor systems are also used for mechanical surface detection and probe collision detection. The robot utilizes a controller with built in VME-bus computer.



**DASY 6 SAR System** 



**DASY 6 Measurement Controller** 



## 7.0 RF CONDUCTED POWER MEASUREMENT

Table 7.1 Conducted Power Measurements, WiFi

	A04211 - Conducted Power Measurements								
Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)	Rated Power (W)	Delta (dB)	SAR Test Channel (Y/N)	Mode	Modulati	on
6	2437	11.46	11.76	0.0150	-0.30	-		CCK-1 Mbps	
6	2437	11.47	11.76	0.0150	-0.29			CCK-2Mbps	
6	2437	11.48	11.76	0.0150	-0.28			DSSS-5.5Mbps	
6	2437	11.76	11.76	0.0150	0.00	Υ		DSSS-11Mbps	
1	2412	4.98	11.76	0.0150	-6.78			DSSS-11Mbps	
2	2417	7.36	11.76	0.0150	-4.40			DSSS-11Mbps	
3	2422	9.61	11.76	0.0150	-2.15			DSSS-11Mbps	000 441
4	2427	11.46	11.76	0.0150	-0.30			DSSS-11Mbps	802.11b
5	2432	11.76	11.76	0.0150	0.00			DSSS-11Mbps	
7	2442	9.83	11.76	0.0150	-1.93			DSSS-11Mbps	
8	2447	8.82	11.76	0.0150	-2.94			DSSS-11Mbps	
9	2452	5.62	11.76	0.0150	-6.14			DSSS-11Mbps	
10	2457	4.26	11.76	0.0150	-7.50			DSSS-11Mbps	
11	2462	0.91	11.76	0.0150	-10.85			DSSS-11Mbps	
1	2412	5.26	11.25	0.0133	-5.99		WLAN 2.4G	OFDM-6Mbps	
4	2427	10.86	11.25	0.0133	-0.39			OFDM-6Mbps	
5	2432	10.72	11.25	0.0133	-0.53			OFDM-6Mbps	
6	2437	10.61	11.25	0.0133	-0.64			OFDM-6Mbps	
7	2442	9.01	11.25	0.0133	-2.24			OFDM-6Mbps	
4	2427	11.25	11.25	0.0133	0.00			OFDM-9Mbps	802.11g
4	2427	11.05	11.25	0.0133	-0.20			OFDM-12Mbps	602.11g
4	2427	11.04	11.25	0.0133	-0.21			OFDM-18Mbps	
4	2427	10.98	11.25	0.0133	-0.27			OFDM-24Mbps	
4	2427	10.97	11.25	0.0133	-0.28			OFDM-36Mbps	
4	2427	10.97	11.25	0.0133	-0.28		]	OFDM-48Mbps	
4	2427	11.10	11.25	0.0133	-0.15			OFDM-54Mbps	
4	2427	10.56	10.73	0.0118	-0.17			MCS-0	
4	2427	10.73	10.73	0.0118	0.00			MCS-3	802.11n
4	2427	10.71	10.73	0.0118	-0.02			MCS-7	

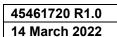




Table 7.2 Conducted Power Measurements, BLE, ANT

	Conducted Power Measurements								
Channel	Frequency	Measured Power	SAR Test Channel	Mode	Modulation				
	(M Hz)	(dBm)	(Y/N)						
2	2402	-0.62	-						
40	2440	1.58	-	ANT	GFSK				
80	2480	-1.03	-						
0	2404	-2.50	-						
17	2440	1.61	-	BLE	GMSK				
36	2480	-1.90	-						

The rated power and tolerance are stated for typical transmission modes and data rates. Some modes and data rates may produce lower than rated conducted power levels. Power measurements taken across the various channels, modes and data rates did not produce levels in excess of the Rated Power plus Tolerance. SAR was evaluated using the power level setting specified by the manufacture to be the max output power and produce the most conservative SAR. SAR was evaluated at the <u>maximum average</u> tune up tolerance. See section 2.0 Client and Device Information for details. The <u>reported</u> SAR was not scaled down.

## 8.0 NUMBER OF TEST CHANNELS (Nc)

#### **Table 8.1 Number of Test Channels**

The intended use of the device is to be mounted on a bike; or optionally hand held. Due to the small form factor, the device may be worn within a user's apparel and was evaluated for body SAR limits. The Front Side (Screen) of the device was found to be the worst-case setup configuration and produced the highest SAR.

#### Wi-FI SAR Evaluation:

SAR was evaluated in DSSS mode with a sample rate of 11Mbps at the maximum duty cycle. The power level setting selected was specified by the manufacturer to be the max output power and produce the most conservative SAR.

As per FCC KDB 248227, the required 802.11 test channels are Ch1, Ch 6 and Ch 11; The highest conducted output power was found on Channel 6 at 11 Mbps in DSSS. As a result, this channel was selected for initial SAR evaluation.

SAR test reduction methodology was applied to reduce the total number of required test channels from the SAR test evaluation.

When applicable, SAR test reduction methods may be utilized.

802.11b DSSS SAR test reduction is determined according to the following:

- a) When the <u>reported</u> SAR of the highest measured maximum output power channel is ≤ to 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration.
- b) When the <u>reported</u> SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest output power channel. When any <u>reported</u> SAR is > 1.2 W/Kg, SAR is required for the third channel.

#### 2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements

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

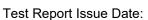
See 13.1 for details.

#### **BLE/ANT SAR Test Evaluation:**

BLE and ANT was not evaluated for SAR.

Per FCC KDB 447498 4.3.1 the BLE/ANT transmitter meets the standalone SAR test exclusion criteria.

NOTE: This device does not operate with simultaneous transmission of the BLE/ANT and WiFi transmissions.





## 9.0 ACCESSORIES EVALUATED

## **Table 9.1 Manufacturer's Accessory List**

	Manufacturer's Accessory List							
Test Report ID Number	· I Manufacturer's Part Number I Description							
P1	362-00087-00	AC Adapter, 5.0V, 1.0A, USB-A Recpt, Fixed AC Plug, US	n/a	n/a				
P2	-	USB-A to USB-C Cable	n/a	n/a				

Test Report Issue Date: 14 March 2022

45461720 R1.0

## **10.0 SAR MEASUREMENT SUMMARY**

### Table 10.1: Measured Results - BODY/EXTREMITY

	Measured SAR Results (1/10g) - Body/Extremity Configuration (FCC/ISED)															
			DI	DUT Test				Accessories			DUT	Spacing	Conducted	Measur	ed SAR	SAR
Date	Plot	Test Type	D	<i>3</i> 1	Frequency	Modulation	Antenna	Battery	Body	Audio	DUT	Antenna	Power	1g	10g	Drift
	ID		M/N	Type	(MHz)		ID	ID	ID	ID	(mm)	(mm)	(dBm)	(W/kg)	(W/kg)	(dB)
28 Feb 2022	B1	Back side	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.143	0.081	0.170
28 Feb 2022	B2	Front side	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.432	0.203	-0.490
28 Feb 2022	В3	Left Side	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.431	0.157	-0.450
28 Feb 2022	B4	Right Side	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.0414	0.026	1.090
28 Feb 2022	B5	Bottom	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.0934	0.047	0.680
28 Feb 2022	В6	Тор	A04211	tx only	2437	DSSS-11mbps	Fixed	Li-ion	n/a	n/a	0	0	11.76	0.0187	0.010	2.740
SAR Limit Spatial Peak Head/Body R					RF Ex	posure (	Category									
	FCC	47 CFR 2.10	093		Health C	anada Safety (	Code 6	1/10 G	ram Av	erage	1.6/4	l.0 W/kg	Gen	eral Popl	ulation	



## 11.0 SCALING OF MAXIMUM MEASURE SAR

### Table 11.1 SAR Scaling 1g

	Scaling of Maximum Measured SAR (1g)						
D/	leasured Parameters		Configuration				
IV	leasured Parameters	Face	Body	Extremity			
	Plot ID		B2				
Maximum Measured SAR <sub>M</sub>			0.432		(W/k		
Frequency			2437		(MHz		
	Power Drift		-0.490		(dB)		
	Conducted Power		11.760		(dBn		
•	Transmit Duty Cycle		83.2		(%)		
Fluid Deviation from Target							
Δе	Permitivity		-3.34%				
Δσ	Conductivity		7.26%				

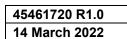
Flu	id Sensitivity Calculation	IEC 62209-2 Annex F		
	Delta SAR = Ce * Δe + Cσ * Δσ			
$Ce = (-0.0007854*f^{3}) + (0.009402*f^{2}) - (0.02742*f) - 0.2026 $ (F.2)				
	$C\sigma = (0.009804*f^3) - (0.08)$	661*f <sup>2</sup> ) + (0.0298	1*f) + 0.7829	(F.3)
f	Frequency (GHz)		2.437	
	Ce		-0.225	
	Сσ		0.483	
	Ce * Δe		0.008	
	Cσ * Δσ		0.035	
	ΔSAR		0.043 (3)	

Note(3): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISED Notice 2012-DRS0529

Manufacturer's Tuneup Tolerance						
Measured Conducted Power 11.760						
Rated Conducted Power		11.760		(dBm)		
ΔΡ		0.000 (4)		(dB)		

Note(4): SAR was Evaluated at the Maximum Tuneup Tolerance. SAR Adjustment is not Required.

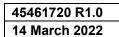
Crest Factor					
Transmit Duty Cycle (DC)		83.2		(%)	
CF (1/DC)		1.20			





## Table 11.1 SAR Scaling 1g (Cont.)

SAR Adjustment for Fluid Sensitivity						
$SAR_1 = SAR_M * \Delta SAR$		0.432		(W/kg)		
SAR Adjus	tment for Tuneu	p Tolerance				
$SAR_2 = SAR_1 + [\Delta P]$		0.432		(W/kg)		
SAR Adjustment for Drift						
SAR <sub>3</sub> = SAR <sub>2</sub> + Drift		0.484		(W/kg)		
SAR Ad	justment for Cre	st Factor				
SAR <sub>4</sub> = SAR <sub>3</sub> x CF		0.581		(W/kg)		
<u>reported</u> SAR						
SAR₄		0.58		(W/kg)		





## Table 11.2 SAR Scaling 10g

	Scaling of Ma	aximum Measu	red SAR (10g)		
D.	Measured Parameters		Configuration		
IV	ileasureu Parameters	Face	Body	Extremity	
	Plot ID			B2	
Max	ximum Measured SAR <sub>M</sub>			0.203	(W/k
	Frequency			2437	(MHz
	Power Drift			-0.490	(dB)
	Conducted Power			11.760	(dBm
	Transmit Duty Cycle			83.2	(%)
	Fluid	Deviation from 7	Target Target		
Δe	Permitivity			-3.34%	
Δσ	Conductivity			7.26%	
Flui	d Sensitivity Calculation (	(10g)	IEC 62209	-2 Annex F	Ī
	Delta SAR = 0	Ce * Δe + Cσ * Δα	J	(F.1)	
	$Ce = (0.003456*f^3) - (0.03456*f^3)$	3531*f <sup>2</sup> ) + (0.0767	75*f) - 0.186	(F.4)	
	$C\sigma = (0.004479*f^3) - (0.0$	1586*f <sup>2</sup> )- (0.1972	*f) + 0.7717	(F.5)	
f	Frequency (GHz)		-	2.437	
	Ce			-0.159	
	Сσ			0.262	
	Ce * Δe			0.005	
	Cσ * Δσ			0.019	
	ΔSAR			0.024 (3)	(%)

Note(3): Delta SAR is Positive, SAR Adjustment for Fluid Sensitivity is not Required, in accordance with ISED Notice 2012-DRS0529

Manufacturer's Tuneup Tolerance					
Measured Conducted Power 11.760					
Rated Conducted Power			11.760	(dBm)	
ΔΡ			0.000 (4)	(dB)	

Note(4): SAR was Evaluated at the Maximum Tuneup Tolerance. SAR Adjustment is not Required.

Crest Factor					
Transmit Duty Cycle (DC)			83.2	(%)	
CF (1/DC)			1.20		



### Table 11.2 SAR Scaling 10g (Cont.)

SAR Adjustment for Fluid Sensitivity						
SAR <sub>1</sub> = SAR <sub>M</sub> * ASAR			0.203	(W/kg)		
SAR Adjus	tment for Tuneu	p Tolerance		ĺ		
$SAR_2 = SAR_1 + [\Delta P]$			0.203	(W/kg)		
SAR Adjustment for Drift						
SAR <sub>3</sub> = SAR <sub>2</sub> + Drift			0.227	(W/kg)		
SAR Adj	ustment for Cre	st Factor				
SAR <sub>4</sub> = SAR <sub>3</sub> x CF			0.272	(W/kg)		
reported SAR						
SAR₄			0.27	(W/kg)		

#### **NOTES to Table**

Scaling of the Maximum Measured SAR is based on the highest Face, Body and/or Head SAR measured of ALL test channels, configurations and accessories used during THIS evaluation. The Measured Fluid Deviation parameters apply only to deviation of the tissue equivalent fluids used at the frequencies which produced the highest measured SAR. The Measured Conducted Power applies to the Conducted Power measured at the frequencies producing the highest Face, Body and/or Head SAR. The Measured Drift is the SAR drift associated with that specific SAR measurement. The Reported SAR is the accumulation of all SAR Adjustments from the applicable Steps 1 through 4. The Plot ID is for indentification of the SAR Measurement Plots in the Annexes of this report.

NOTE: Some of the scaling factors in Steps 1 through 4may not apply and are identified by grayed fields.

#### Step 1

Per IEC/IEEE 62209-1528, FCC KDB 865664, ISED RSS-102 and ISED Notice 2012-DRS0529. Scaling required only when Measured Fluid Deviation is greater than 5%. If the Measured Fluid Deviation is greater than 5%,

Table 10.1 will be shown and will indicate the SAR scaling factor in percent (%). SAR is MULTIPLIED by this scaling factor only when the scaling factor is positive (+).

#### Step 2

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISED RSS-102. Scaling required only when the difference (Delta) between the Measured Conducted Power and the Manufacturer's Rated Conducted Power is (-) Negative.

The absolute value of Delta is ADDED to the SAR.

#### Step 3

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISED RSS-102. Scaling required only when Measured Drift is (-) Negative. The absolute value of Measured Drift is added to Reported.

#### Step 4

Per IEC/IEEE 62209-1528, FCC KDB 865664 and ISED RSS-102. When the transmit Duty Cyle (DC) is less than 100%, the <u>reported</u> SAR must be scaled to 100% by the Crest Factor (CF). CF = 1/DC where DC is in decimal.

#### Step 5

The Reported SAR is the Maximum Final Adjusted SAR from the applicable Steps 1 through 4and are reported on Page 1 of this report.

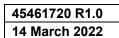


## **12.0 SAR EXPOSURE LIMITS**

## **Table 12.1 Exposure Limits**

	SAR RF EXPOSURE LIMITS					
FCC 47 CFR§2.1093	Health Canada Safety Code 6	General Population /	Occupational /			
100 47 011(32:1000	Thousan Gunda Gunday Godd G	Uncontrolled Exposure (4)	Controlled Exposure <sup>(5)</sup>			
Spa	tial Average <sup>(1)</sup>	0.08 W/kg	0.4 W/kg			
(averaged	over the whole body)	0.00 <b>W</b> /Ng	o.i wing			
Sp	oatial Peak <sup>(2)</sup>	1.6 W/kg	8.0 W/kg			
(Head and Trunk av	eraged over any 1 g of tissue)	1.0 Wing	0.0 W/Ng			
Sp	oatial Peak <sup>(3)</sup>	4.0 W/kg	20.0 W/kg			
(Hands/Wrists/Fee	t/Ankles averaged over 10 g)	4.0 W/Ng	20.0 W/kg			

- (1) The Spatial Average value of the SAR averaged over the whole body.
- (2) The Spatial Peak value of the SAR averaged over any 1 gram of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.
- (3) The Spatial Peak value of the SAR averaged over any 10 grams of tissue, defined as a tissue volume in the shape of a cube and over the appropriate averaging time.
- (4) Uncontrolled environments are defined as locations where there is potential exposure to individuals who have no knowledge or control of their potential exposure.
- (5) Controlled environments are defined as locations where there is potential exposure to individuals who have knowledge of their potential exposure and can exercise control over their exposure.





## 13.0 DETAILS OF SAR EVALUATION

## 13.1 Day Log

	D	AY LOG			lectric			
	Ambient	Fluid	Relative					
Date	Temp	Temp	Humidity	Pressure	nig	ပ္	est	
	(° C)	(° C)	(%)	(kPa)	F	SPC	Te	Task
28 Feb 2022	21.5	22.2	22%	101.5	Х	Х	Х	2450H Fluid, SPC, SAR Testing



### 13.2 DUT Setup and Configuration

<b>DUT Setu</b>	p and Confi	guration
-----------------	-------------	----------

#### Overview

The A04211 was evaluated for Extremity SAR at the maximum conducted output power level, preset by the manufacturer, with a fully charged battery in unmodulated continuous transmit operation (Maximum duty cycle), as provided by the manufacturer with a unit set up and pre-installed with Compliance Test Mode.

## 13.3 DUT Positioning

### **DUT Positioning**

### Positioning

The DUT Positioner was securely fastened to the Phantom Platform to ensure consistent positioning of the DUT for each test evaluation.

#### **FACE Configuration**

This device is not capable of voice communication and was not tested in the FACE configuration.

#### **BODY Configuration**

There are no Body-Worn and Audio Accessories for this device and was not evaluated for BODY configuration.

### **HEAD Configuration**

This device is not intended to be held to the ear and was not tested in the HEAD configuration.

### EXTREMITY

#### Configuration

The DUT, was securely clamped into the device holder with the surface of the DUT normally in contact with the body (hand) in direct contact with the bottom of the phantom, or 0mm separation from the DUT to the phantom resembling that for which it was intended to be used.



Test Report Issue Date:

45461720 R1.0 14 March 2022

#### 13.4 General Procedures and Report

#### **General Procedures and Reporting**

#### General Procedures

The fluid dielectric parameters of the Active Tissue Simulating Liquid (TSL) were measured as described in this Section, recorded and entered into the DASY Measurement Server. Active meaning the TSL used during the SAR evaluation of the DUT. The temperature of the Active TSL was measured and recorded prior to performing a System Performance Check (SPC). An SPC was performed with the Active TSL prior to the start of the test series. The temperature of the Active TSL was measured throughout the day and the Active TSL temperature was maintained to  $\pm 0.5^{\circ}$ C. The Active TSL temperature was maintained to within  $\pm 2.0^{\circ}$ C throughout the test series. The liquid parameters shall be measured within 24 hours before the start of a test series and if it takes longer than 48 hours, the liquid parameters shall also be measured at the end of the test series.

An Area Scan exceeding the length and width of the DUT projection was performed and the locations of all maximas within 2dB of the Peak SAR recorded. A Zoom Scan centered over the Peak SAR location(s) was performed and the 1g and 10g SAR values recorded. The resolutions of the Area Scan and Zoom Scan are described in the Scan Resolution table(s) in this Section. A Power Reference Measurement was taken at the phantom reference point immediately prior to the Area Scan. A Power Drift measurement was taken at the phantom reference point immediately following the Zoom Scan to determine the power drift. A Z-Scan from the Maximum Distance to Phantom Surface to the fluid surface was performed following the power drift measurement.

#### Reporting

The 1g SAR, 10g SAR and power drift measurements are recorded in the SAR Measurement Summary tables in the SAR Measurement Summary Section of this report. The SAR values shown in the SAR column are the SAR values reported by the SAR Measurement Server with the DUT operating at maximum transmit duty cycle. These tables also include other information such as transmit channel and frequency, modulation, accessories tested and DUT-phantom separation distance.

In the Scaling of Maximum Measured SAR Section of this report, the highest measured SAR in the BODY configuration, within the entire scope of this assessment, are, when applicable, scaled for Fluid Sensitivity, Manufacturer's Tune-Up Tolerance, Simultaneous Transmission and Drift. With the exception of Duty Cycle correction/compensation, SAR values are ONLY scaled up, not down. The final results of this scaling is the reported SAR which appears on the Cover Page of this report.



### 13.5 Fluid Dielectric and Systems Performance Check

#### Fluid Dielectric and Systems Performance Check

#### Fluid Dielectric Measurement Procedure

The fluid dielectric parameters of the Tissue Simulating Liquid (TSL) are measured using the Open-Ended Coax Method connected to an Agilent 8753ET Network Analyzer connected to a measurement server running Aprel Dielectric Property Measurement System. A frequency range of ± 100MHz for frequencies > 300MHz and ± 50MHz for frequencies ≤ 300MHz with frequency step size of 10MHz is used. The center frequency is centered around the SAR measurement probe's calibration point for that TSL frequency range. A calibration of the setup is performed using a short-open-deionized water (at 23°C in a 300ml beaker) method. A sample of the TSL is placed in a 300ml beaker and the open-ended coax is submerged approximately 8mm below the fluid surface in the approximate center of the beaker. A check of the setup is made to ensure no air is trapped under the open-ended coax. The sample of TSL is measured and compared to the FCC KDB 865664 targets for HEAD or BODY for the entire fluid measurement range. Fluid adjustment are made if the dielectric parameters are > 5% in range that the DUT is to be tested. If the adjustments fail to bring the parameters to ≤ 5% but are < 10%, the SAR Fluid Sensitivity as per IEC 62201-1 and FCC KDB 865664 are applied to the highest measured SAR. A TSL with dielectric parameters > 10% in the DUT test frequency range are not used.

#### Systems Performance Check

The fluid dielectric parameters of the Active TSL are entered into the DASY Measurement Server at each of the 10MHz step size intervals. Active meaning the TSL used during the SAR evaluation of the DUT. The DASY Measurement System will automatically interpolate the dielectric parameters for DUT test frequencies that fall between the 10MHz step intervals.

A Systems Performance Check (SPC) is performed in accordance with IEEE 1528 "System Check" and FCC KDB 865664 "System Verification". A validation source, dipole or Confined Loop Antenna (CLA), is placed under the geometric center of the phantom and separated from the phantom in accordance to the validation source's Calibration Certificate data. A CW signal set to the frequency of the validate source's and SAR measurement probe's calibration frequency with a forward power set to the validation source's Calibration Certificate data power setting is applied to the validation source. An Area Scan is centered over the projection of the validation source's feed point and an Area Scan is taken. A Zoom Scan centered over the Peak SAR measurement of the Area Scan and the 1g and 10g SAR is measured. The measured 1g and 10g SAR is compared to the 1g and 10g SAR measurements from the validation source's Calibration Certificate. When required, the measured SAR is normalized to 1.0W and compared to the normalized SAR indicated on the validation source's Calibration Certificate. The SPC is considered valid when the measured and normalized SAR is 10% of the measured and normalize SAR of the validation source's Calibration Certificate.

The fluid dielectric parameters of the Active TSL and SPC are repeated when the Active TSL has been in use for greater than 84 hours or if the Active TSL temperature has exceed ± 1°C of the initial fluid analysis.

#### 13.6 Scan Resolution 100MHz to 2GHz

Scan Resolution 100MHz to 2GHz				
Maximum distance from the closest measurement point to phantom surface: (Geometric Center of Probe Center)	4 ± 1 mm			
Maximum probe angle normal to phantom surface. (Flat Section ELI Phantom)	5° ± 1°			
Area Scan Spatial Resolution ΔX, ΔY	15 mm			
Zoom Scan Spatial Resolution $\Delta X$ , $\Delta Y$	7.5 mm			
Zoom Scan Spatial Resolution ∆Z (Uniform Grid)	5 mm			
Zoom Scan Volume X, Y, Z	30 mm			
Phantom	ELI			
Fluid Depth	150 ± 5 mm			

An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.

A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR



### 13.7 Scan Resolution 2GHz to 3GHz

Scan Resolution 2GHz to 3GHz				
Maximum distance from the closest measurement point to phantom surface:	4 ± 1 mm			
(Geometric Center of Probe Center)	4 = 1 111111			
Maximum probe angle normal to phantom surface.	5° ± 1°			
(Flat Section ELI Phantom)	3 I I			
Area Scan Spatial Resolution ΔX, ΔΥ	12 mm			
Zoom Scan Spatial Resolution $\Delta X$ , $\Delta Y$	5 mm			
Zoom Scan Spatial Resolution ∆Z	5 mm			
(Uniform Grid)	5 111111			
Zoom Scan Volume X, Y, Z	30 mm			
Phantom	ELI			
Fluid Depth	150 ± 5 mm			

An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.

A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR

#### 13.8 Scan Resolution 5GHz to 6GHz

Scan Resolution 5GHz to 6GHz				
Maximum distance from the closest measurement point to phantom surface:	4 ± 1 mm			
(Geometric Center of Probe Center)				
Maximum probe angle normal to phantom surface.	5° ± 1°			
(Flat Section ELI Phantom)	3 1 1			
Area Scan Spatial Resolution $\Delta X$ , $\Delta Y$	10 mm			
Zoom Scan Spatial Resolution ΔX, ΔΥ	4 mm			
Zoom Scan Spatial Resolution ∆Z	2 mm			
(Uniform Grid)	2 111111			
Zoom Scan Volume X, Y, Z	22 mm			
Phantom	ELI			
Fluid Depth	100 ± 5 mm			

An Area Scan with an area extending beyond the device was used to locate the candidate maximas within 2dB of the global maxima.

A Zoom Scan centered over the peak SAR location(s) determined by the Area Scan was used to determine the 1-gram and 10-gram peak spatial-average SAR



## 14.0 MEASUREMENT UNCERTAINTIES

**Table 14.1 Measurement Uncertainty** 

							Stand	Stand	Vi
Source of Uncertainty	IEEE	Toler	Prob	Div	Ci	Ci	Unct	Unct	or
,	1528 Section	±%	Dist				±%	±%	V <sub>eff</sub>
Magaurament System	Section	± /6	Dist		(1g)	(10g)	(1g)	(10g)	♥ eff
Measurement System	F 2.4	6.7	N	1	1	1			
EX3DV4 Probe Calibration** (k=1)	E.2.1		R	√3	0.7	0.7	6.7 0.2	6.7	8
Axial Isotropy** (k=1)	E.2.2	0.6						0.2	
Hemispherical Isotropy** (k=1)	E.2.2	3.2	R	√3	0.7	0.7	1.3	1.3	8
Boundary Effect*	E.2.3	1.0	R	√3	1	1	0.6	0.6	∞
Linearity** (k=1)	E.2.4	0.5	R	√3	1	1	0.3	0.3	∞
System Detection Limits*	E.2.4	1.0	R	√3	1	1	0.6	0.6	∞
Modulation Response** (k=1)	E.2.5	8.3	R	√3	1	1	4.8	4.8	∞
Readout Electronics*	E.2.6	0.3	N	1 /2	1	1	0.3	0.3	8
Response Time*	E.2.7	0.8	R	√3	1	1	0.5	0.5	∞
Integration Time*	E.2.8	2.6	R	√3	1	1	1.5	1.5	∞
RF Ambient Conditions - Noise	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
RF Ambient Conditions - Reflection Probe Positioner Mechanical	E.6.1	0.0	R	√3	1	1	0.0	0.0	10
Tolerance*	E.6.2	0.0	R	√3	1	1	0.0	0.0	8
Probe Positioning wrt Phantom Shell*	E.6.3	0.4	R	√3	1	1	0.2	0.2	8
Post-processing*	E.5	2.0	R	√3	1	1	1.2	1.2	8
Test Sample Related									
Test Sample Positioning	E.4.2	2.2	Ν	1	1	1	2.2	2.2	5
Device Holder Uncertainty*	E.4.1	3.6	Ν	1	1	1	3.6	3.6	8
SAR Drift Measurement <sup>(2)</sup>	E.2.9	0.0	R	√3	1	1	0.0	0.0	∞
SAR Power Scaling <sup>(3)</sup>	E.6.5	0.0	R	√3	1	1	0.0	0.0	8
Phantom and Tissue Parameters									
Phantom Uncertainty*	E.3.1	6.1	R	√3	1	1	3.5	3.5	8
SAR Correction Uncertainty	E.3.2	1.6	Ν	1	1	0.84	1.6	1.3	8
Liquid Conductivity (measurement)	E.3.3	5.0	N	1	0.78	0.71	3.9	3.6	10
Liquid Permittivity (measurement)	E.3.3	5.0	N	1	0.23	0.26	1.2	1.3	10
Liquid Conductivity (Temperature)	E.3.2	0.4	R	√3	0.78	0.71	0.2	0.2	10
Liquid Permittivity Temperature) E.3.2 0.2		R	√3	0.23	0.26	0.0	0.0	10	
Effective Degrees of Freedom <sup>(*)</sup>		V.=	.,		0.20	0.20	J.J		
								V <sub>eff</sub> =	1141
Combined Standard Uncertainty  Expanded Uncertainty (95% Confiden			RSS				11.1	11.0	

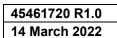
<sup>(1)</sup> The Effective Degrees of Freedom is > 30

Therefore a coverage factor of k=2 represents an approximate confidence level of 95%.

<sup>(2)</sup> The SAR Value is compensated for Drift

<sup>(3)</sup> SAR Power Scaling not Required

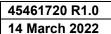
<sup>\*</sup> Provided by SPEAG for DASY4





## **Table 14.2 Calculation of Degrees of Freedom**

Calculation of the Degrees and Effective Degrees of Freedom							
v <sub>i</sub> = n - 1	V <sub>eff</sub> =	$\frac{u_c^4}{m}$ $\sum_{i=1}^{\infty} \frac{c_i^A u_i^A}{v_i}$					





### 15.0 FLUID DIELECTRIC PARAMETERS

### Table 15.1 Fluid Dielectric Parameters 2450MHz HEAD TSL

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

Aprel Laboratory
Test Result for UIM Dielectric Parameter
Mon 28/Feb/2022 11:26:19

Freq Frequency(GHz)
FCC\_eHFCC OET 65 Supplement C (June 2001) Limits for Head Epsilon
FCC\_sHFCC OET 65 Supplement C (June 2001) Limits for Head Sigma

Test\_e Epsilon of UIM
Test\_s Sigma of UIM

Freq FCC eHFCC sHTest e Test s 2.3500 39.38 1.71 38.22 1.80 2.3600 39.36 1.72 38.14 1.80 39.34 38.18 1.79 2.3700 1.73 39.32 38.00 1.78 2.3800 1.74 2.3900 39.31 1.75 37.91 1.79 2.4000 39.29 1.76 37.73 1.80 2.4100 39.27 37.67 1.82 1.76 2.4200 39.25 37.58 1.87 1.77 1.88 2.4300 39.24 1.78 37.63 2.4400 39.22 1.79 37.91 1.92 2.4500 39.20 37.83 1.93 1.80 2.4600 39.19 1.81 38.19 1.95 2.4700 39.17 1.82 38.10 1.94 2.4800 39.16 1.83 38.16 1.93 2.4900 39.15 1.84 37.98 1.92 2.5000 37.76 39.14 1.85 1.91 37.49 2.5100 39.12 1.93 1.87 37.28 1.95 2.5200 39.11 1.88 2.5300 37.32 2.00 39.10 1.89 2.5400 39.09 37.47 2.02 1.90 2.5500 39.07 1.91 37.58 2.03



	FLUID DIELECTRIC PARAMETERS							
Date: 28 Feb	20	22 Fluid Te	emp: 23.6	Frequency:	2450MHz	Tissue:	Head	
Freq (MHz)		Test_e	Test_s	Target_e	Target_s	Deviation Permittivity	Deviation Conductivity	
2350.0000		38.2200	1.8000	39.3800	1.71	-2.95%	5.26%	
2360.0000		38.1400	1.8000	39.3600	1.72	-3.10%	4.65%	
2370.0000		38.1800	1.7900	39.3400	1.73	-2.95%	3.47%	
2380.0000		38.0000	1.7800	39.3200	1.74	-3.36%	2.30%	
2390.0000		37.9100	1.7900	39.3100	1.75	-3.56%	2.29%	
2400.0000		37.7300	1.8000	39.2900	1.76	-3.97%	2.27%	
2410.0000		37.6700	1.8200	39.2700	1.76	-4.07%	3.41%	
2420.0000		37.5800	1.8700	39.2500	1.77	-4.25%	5.65%	
2430.0000		37.6300	1.8800	39.2400	1.78	-4.10%	5.62%	
2440.0000		37.9100	1.9200	39.2200	1.79	-3.34%	7.26%	
2450.0000		37.8300	1.9300	39.2000	1.80	-3.49%	7.22%	
2460.0000		38.1900	1.9500	39.1900	1.81	-2.55%	7.73%	
2470.0000		38.1000	1.9400	39.1700	1.82	-2.73%	6.59%	
2480.0000		38.1600	1.9300	39.1600	1.83	-2.55%	5.46%	
2490.0000		37.9800	1.9200	39.1500	1.84	-2.99%	4.35%	
2500.0000		37.7600	1.9100	39.1400	1.85	-3.53%	3.24%	
2510.0000		37.4900	1.9300	39.1200	1.87	-4.17%	3.21%	
2520.0000		37.2800	1.9500	39.1100	1.88	-4.68%	3.72%	
2530.0000		37.3200	2.0000	39.1000	1.89	-4.55%	5.82%	
2540.0000		37.4700	2.0200	39.0900	1.90	-4.14%	6.32%	
2550.0000		37.5800	2.0300	39.0700	1.91	-3.81%	6.28%	

\*Channel Frequency Tested



### 16.0 SYSTEM VERIFICATION TEST RESULTS

Table 16.1 System Verification Results 2450MHz HEAD TSL

System Verification Test Results							
Data		Frequency	Valid	Validation Sour			
Date		(MHz)	P/N	l	S/N		
28 Feb 2	022	2450	D2450	V2	825		
	Fluid	Ambient	Ambient Forward		Source		
Fluid Type	Temp	Temp	Humidity	Power	Spacing		
	°C	°C	(%)	(mW)	(mm)		
Head	22.2	22	22% 250		10		
Fluid Parameters							
P	ermittivity	/	Conductivity				
Measured	Target	Deviation	Measured	Target	Deviation		
37.83	39.20	-3.49%	1.93	1.80	7.22%		
		Measu	red SAR				
	1 gram		10 gram				
Measured	Target	Deviation	Measured	Target	Deviation		
14.00	13.18	6.22%	6.32	6.01	5.25%		
	Mea	sured SAR N	ormalized to 1	.0W			
	1 gram			10 gram			
Normalized	Target	Deviation	Normalized	Target	Deviation		
56.00	52.72	6.22%	25.28	24.02	5.27%		
Driar to the CAD evaluations, evator about a ware nerformed							

Prior to the SAR evaluations, system checks were performed on the planar section of the phantom and a SPEAG validation dipole in accordance with the procedures described in IEEE 1528-2013, FCC KDB 846224, IEC 62209-1 and IEC 62209-1528.

The dielectric parameters of the simulated tissue mixture were measured prior to the system performance check using a Dielectric Probe Kit and a Network Analyzer.

The forward power was applied to the dipole and the system was verified to a tolerance of +10% from the system manufacturer's dipole calibration target SAR value.

The forward power applied was same forward power applied by the calibration lab during the calibration of this validation source.



Test Report Issue Date: 14 March 2022

45461720 R1.0

## 17.0 SYSTEM VALIDATION SUMMARY

## **Table 17.1 System Validation Summary**

	System Validation Summary										
Frequency	Validation	Probe	Probe	Validation	Source	Tissue	Tissue Dielectrics Validation Results			ılts	
(MHz)	Date	Model	S/N	Source	S/N	iissue	Permitivity	Conductivity	Sensitivity	Linearity	Isotropy
30	31-May-21	EX3DV4	3600	CLA-30	1005	Head	52.40	0.75	Pass	Pass	Pass
1640	12-Jun-21	EX3DV4	3600	1620-S-2	207-00102	Head	39.87	1.27	Pass	Pass	Pass
2450	29-Jun-21	EX3DV4	3600	D2450V2	825	Head	38.53	1.85	Pass	Pass	Pass
5250	25-May-21	EX3DV4	3600	D5GHzV2	1031	Head	33.74	4.9	Pass	Pass	Pass
5750	28-May-21	EX3DV4	3600	D5GHzV2	1031	Head	34.99	5.10	Pass	Pass	Pass



## **18.0 MEASUREMENT SYSTEM SPECIFICATIONS**

## **Table 18.1 Measurement System Specifications**

	Measurement System Specification					
Specifications						
Positioner	Stäubli Unimation Corp. Robot Model: TX90XL					
Repeatability	+/- 0.035 mm					
No. of axis	6.0					
Data Acquisition Electronic (	DAE) System					
Cell Controller						
Processor	Intel(R) Core(TM) i7-7700					
Clock Speed	3.60 GHz					
Operating System	Windows 10 Professional					
Data Converter						
Features	Signal Amplifier, multiplexer, A/D converter, and control logic					
Software	Measurement Software: DASY6, V 6.4.0.12171 / DASY52 V52.10.0.1446					
Joitwale	Postprocessing Software: SEMCAD X, V14.6.10( Deployment Build )					
Connecting Lines	Optical downlink for data and status info., Optical uplink for commands and clock					
DASY Measurement Server						
Function	Real-time data evaluation for field measurements and surface detection					
Hardware	Intel ULV Celeron CPU 400 MHz; 128 MB chip disk; 128 MB RAM					
Connections	COM1, COM2, DAE, Robot, Ethernet, Service Interface					
E-Field Probe						
Model	EX3DV4					
Serial No.	3600					
Construction	Triangular core fiber optic detection system					
Frequency	10 MHz to 6 GHz					
Linearity	±0.2 dB (30 MHz to 3 GHz)					
Phantom						
Туре	ELI Elliptical Planar Phantom					
Shell Material	Fiberglass					
Thickness	2mm +/2mm					
Volume	> 30 Liter					



	Measurement System Specification	Measurement System Specification				
	Probe Specification					
	Symmetrical design with triangular core;					
Construction:	Built-in shielding against static charges					
	PEEK enclosure material (resistant to organic solvents, glycol)					
	In air from 10 MHz to 2.5 GHz					
Calibration:	In head simulating tissue at frequencies of 900 MHz					
	and 1.8 GHz (accuracy $\pm$ 8%)					
Frequency:	10 MHz to > 6 GHz; Linearity: ± 0.2 dB (30 MHz to 3 GHz)					
Directivity:	± 0.2 dB in head tissue (rotation around probe axis)					
Directivity.	$\pm0.4$ dB in head tissue (rotation normal to probe axis)					
Dynamic Range:	5 μW/g to > 100 mW/g; Linearity: ± 0.2 dB					
Surface Detect:	$\pm0.2$ mm repeatability in air and clear liquids over diffuse reflecting surfaces					
	Overall length: 330 mm; Tip length: 16 mm;					
Dimensions:	Body diameter: 12 mm; Tip diameter: 6.8 mm					
	Distance from probe tip to dipole centers: 2.7 mm	11-0				
Application:	General dosimetry up to 3 GHz; Compliance tests of mobile phone	EX3DV4 E-Field Probe				
	Phantom Specification					

The ELI V5.0 phantom is an elliptical planar fiberglass shell phantom with a shell thickness of 2.0mm +/- .2mm at the planar area. This phantom conforms to OET Bulletin 65, Supplement C, IEEE 1528-2013, IEC 62209-1 and IEC 62209-2.



#### **Device Positioner Specification**

The DASY device positioner 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.



**Device Positioner** 



## **19.0 TEST EQUIPMENT LIST**

**Table 19.1 Equipment List and Calibration** 

T	est Equipm	ent List			
DESCRIPTION	ASSET NO.	SERIAL NO.	DATE CALIBRATED	CALIBRATION DUE	
Schmid & Partner DASY 6 System	-	-	-	-	
-DASY Measurement Server	00158	1078	CNR	CNR	
-Robot	00046	599396-01	CNR	CNR	
-DAE4	00019	353	22-Apr-21	22-Apr-22	
-EX3DV4 E-Field Probe	00213	3600	20-Apr-21	20-Apr-22	
-CLA 30 Validation Dipole	00300	1005	18-Mar-20	18-Mar-23	
-CLA150 Validation Dipole	00251	4007	18-Mar-20	18-Mar-23	
-D450V3 Validation Dipole	00221	1068	27-Apr-21	27-Apr-24	
-D750V3 Validation Dipole	00238	1061	21-Mar-19	21-Mar-22	
-D835V2 Validation Dipole	00217	4D075	27-Apr-21	27-Apr-24	
-D900V2 Validation Dipole	00020	54	16-Mar-20	16-Mar-23	
ALS-D-01640-S-2	00299	207-00102	15-Dec-20	15-Dec-23	
-D1800V2 Validation Dipole	00222	247	16-Mar-20	16-Mar-23	
-D1900V2 Validation Dipole	00218	5d107	16-Mar-20	16-Mar-23	
ALS-D-2300-S-2	00328	218-00201	26-Feb-19	26-Feb-22	
-D2450V2 Validation Dipole	00219	825	24-Apr-21	24-Apr-24	
ALS-D-2600-S-2	00327	225-00926	26-Feb-19	26-Feb-22	
-D5GHzV2 Validation Dipole	00126	1031	27-Apr-21	27-Apr-24	
ELI Phantom	00247	1234	CNR	CNR	
SAM Phantom	00154	1033	CNR	CNR	
HP 85070C Dielectric Probe Kit	00033	none	CNR	CNR	
Gigatronics 8652A Power Meter	00007	1835801	26-Mar-19	26-Mar-22	
Gigatronics 80701A Power Sensor	00186	1837002	COU	COU	
Gigatronics 80334A Power Sensor	00237	1837001	26-Mar-19	26-Mar-22	
HP 8753ET Network Analyzer	00134	US39170292	6-Jan-21	6-Jan-24	
Rohde & Schwarz SMR20 Signal Generator	00006	100104	11-Aug-20	11-Aug-23	
Amplifier Research 10W1000C Power Amplifier	00041	27887	CNR	CNR	
Amplifier Research 5S1G4 Power Amplifier	00106	26235	CNR	CNR	
Narda Directional Coupler 3020A	00064	-	CNR	CNR	
Kangaroo VWR Humidity/Thermometer	00334	192385455	5-Aug-19	6-Aug-22	
Digital Multi Meter DMR-1800	00250	TE182	23-Jun-20	23-Jun-23	
Bipolar Power Supply 6299A	00086	1144A02155	CNR	CNR	
DC-18G 10W 30db Attenuator	00102	-	COU	COU	
R&S FSP40 Spectrum Analyzer	00241	100500	9-Aug-21	9-Aug-24	
HP 8566B Spectrum Analyzer	00051	2747A055100	29-Jun-20	29-Jun-23	
RF Cable-SMA	00311	-	CNR	CNR	
HP Calibration Kit	00145	-	CNR	CNR	

CNR = Calibration Not Required

COU = Calibrate on Use



## 20.0 FLUID COMPOSITION

Table 20.1 Fluid Composition 150MHz HEAD TSL

Table 20.1			2450MHz Head		
Tissue Simulating Liquid (TSL) Composition					
Component by Percent Weight					
Water	Glycol	Salt <sup>(1)</sup>	HEC <sup>(2)</sup>	Bacteriacide <sup>(3)</sup>	
52.0	48.0	0.0	0.0	0.0	

- (1) Non-lodinized
- (2) HydroxyEthyl-Cellulose: Sigma-Aldrich P/N 54290-500g
- (3) Dow Chemical Dowicil 75 Antimicrobial Perservative

Note: 150MHz HEAD TSL formulation was used during this evaluation.



### **APPENDIX A - SYSTEM VERIFICATION PLOTS**

DUT: Dipole 2450 MHz D2450V2; Type: D2450V2; Serial: D2450V2 - SN:825 Procedure Name: SPC 2450H\_Input=250mw, Target=[11.86]13.18][14.50]W/kg\_ 2

Communication System: UID 0, CW (0); Frequency: 2450 MHz; Duty Cycle: 1:1 Medium parameters used: f = 2450 MHz;  $\sigma = 1.93$  S/m;  $\epsilon_f = 37.83$ ;  $\rho = 1000$  kg/m<sup>3</sup>

Phantom section: Flat Section

Date/Time: 2/28/2022 12:10:38 PM

#### **DASY5** Configuration:

Probe: EX3DV4 - SN3600; ConvF(6.45, 6.45, 6.45) @ 2450 MHz; Calibrated: 4/28/2021

• Sensor-Surface: 4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn353; Calibrated: 4/22/2021

Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234

Measurement SW: DASY52, Version 52.10 (3); SEMCAD X Version 14.6.13 (7474)

SPC/SPC 2450H\_Input=250mw, Target=[11.86]13.18][14.50]W/kg\_ 2/Area Scan (4x9x1): Measurement grid: dx=12mm, dy=12mm Maximum value of SAR (measured) = 13.8 W/kg

SPC/SPC 2450H\_Input=250mw, Target=[11.86]13.18][14.50]W/kg\_ 2/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 89.66 V/m; Power Drift = 0.04 dB

Peak SAR (extrapolated) = 30.6 W/kg

SAR(1 g) = 14 W/kg; SAR(10 g) = 6.32 W/kg

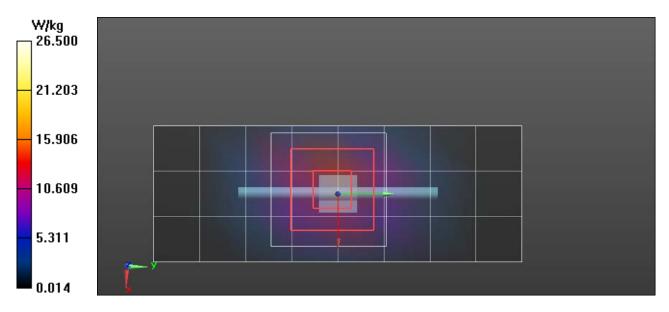
Smallest distance from peaks to all points 3 dB below = 10 mm

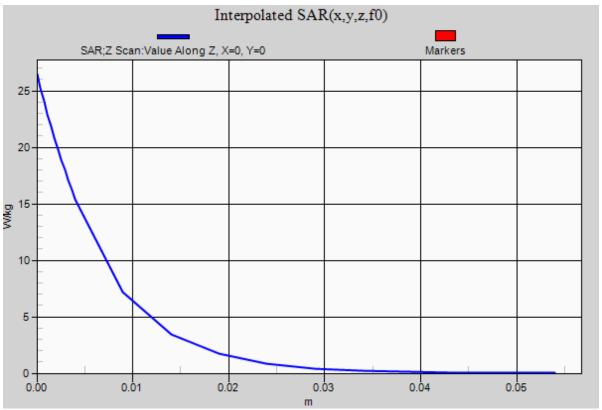
Ratio of SAR at M2 to SAR at M1 = 46.6%

Maximum value of SAR (measured) = 15.9 W/kg

**SPC/SPC 2450H\_Input=250mw, Target=[11.86]13.18][14.50]W/kg\_ 2/Z Scan (1x1x22):** Measurement grid: dx=20mm, dy=20mm, dz=5mm

Penetration depth = 6.821 (6.593, 7.008) [mm] Maximum value of SAR (interpolated) = 26.5 W/kg







#### APPENDIX B – MEASUREMENT PLOTS OF MAXIMUM MEASURED SAR

#### Plot B2

DUT: A04211; Type: Transmitter; Serial: 3390944608

Procedure Name: B2-A04211, Body- Front Side, 2437MHz, 11 bits WIFI

Communication System: UID 0, CW (0); Frequency: 2437 MHz

Medium parameters used (interpolated): f = 2437 MHz;  $\sigma = 1.908 \text{ S/m}$ ;  $\epsilon_r = 37.826$ ;  $\rho = 1000 \text{ kg/m}^3$ 

Phantom section: Flat Section

Date/Time: 2/28/2022 5:35:50 PM

#### **DASY5** Configuration:

Probe: EX3DV4 - SN3600; ConvF(6.45, 6.45, 6.45) @ 2437 MHz; Calibrated: 4/28/2021

 Sensor-Surface: 4mm (Mechanical Surface Detection (Locations From Previous Scan Used)), Sensor-Surface: 4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn353; Calibrated: 4/22/2021

Phantom: ELI V5.0 (20deg probe tilt); Type: QD OVA 002 Ax; Serial: 1234

Measurement SW: DASY52, Version 52.10 (3); SEMCAD X Version 14.6.13 (7474)

2450H/B2-A04211, Body- Front Side, 2437MHz, 11 bits WIFI/Area Scan (8x13x1): Measurement grid: dx=12mm, dy=12mm

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 0.416 W/kg

2450H/B2-A04211, Body- Front Side, 2437MHz, 11 bits WIFI/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 5.074 V/m; Power Drift = -0.49 dB

Peak SAR (extrapolated) = 1.18 W/kg

SAR(1 g) = 0.432 W/kg; SAR(10 g) = 0.203 W/kg

Smallest distance from peaks to all points 3 dB below = 11 mm

Ratio of SAR at M2 to SAR at M1 = 43.9%

Info: Interpolated medium parameters used for SAR evaluation.

Maximum value of SAR (measured) = 0.470 W/kg

2450H/B2-A04211, Body- Front Side, 2437MHz, 11 bits WIFI/Z Scan (1x1x22): Measurement grid: dx=20mm, dy=20mm, dz=5mm

Info: Interpolated medium parameters used for SAR evaluation.

Penetration depth = 110.5 (24.72, 154.5) [mm] Maximum value of SAR (interpolated) = 0.0715 W/kg



