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FCC SAR Test Report

Product : Learning App Tablet

Trade mark : LeapFrog

Model/Type reference : 6020

Report Number : 180423008SAR-1

Date of Issue : Apr. 28, 2018

FCC ID : G2R-6020

Test Standards : FCC 47 CFR Part 2 §2.1093

ANSI/IEEE C95.1-1992 IEEE Std 1528-2013

Test result : PASS

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Version

Version No.	Date	Description
V1.0	Apr. 28, 2018	Original





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1 General Information

1.1 Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for the EUT are as follows:

The maximum recalls of epocine recorption rate (erar) realist acting to the 201 are as follows.			
		Highest Reported	
Equipment Mode		Body SAR _{1g}	
Class	Mode	(0 cm Gap)	
		(W/kg)	
DTS	2.4G WLAN	0.20	



1.2 EUT Description

1.2.1 General Description

Product Name	Learning App Tablet	
Trade mark	LeapFrog	
Model No.(EUT)	6020	
FCC ID	G2R-6020	
Device Dimension	Overall (Length × Width): 245mm × 150mm	
HW Version	N/A	
SW Version	N/A	
Tx Frequency Bands (Unit: MHz)	WLAN: 2412 ~ 2462	
Antenna Type	Fixed Internal Antenna	
EUT Stage	Production Unit	
This report was verified based on the worst case SAR configuration of		
Declaration of Differences	SAR report with report No. 17040452HKG-001, the differences compared with	
	original report is changing WiFi layout, all the other is the same.	

1.2.2 Wireless Technologies

	802.11b
2.4G WLAN	802.11g
	802.11n (HT20/HT40)

1.2.3 List of Accessory

Rattory	Power Rating	3.7Vdc, 3500mAh
Dattery	Туре	Li-ion Li-ion

1.3 Maximum Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

Mode	2.4G WLAN	
802.11b	11.5	
802.11g	8.5	
802.11n HT20	8.5	
802.11n HT40	8.5	



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1.4 Other Information

Sample Received Date:	Apr. 26, 2018
Sample tested Date:	Apr. 27, 2018

1.5 Testing Location

Shenzhen UnionTrust Quality and Technology Co., Ltd.

Address: Address: 16/F, Block A, Building 6, Baoneng Science and Technology Park, Qingxiang Road No.1,

Longhua New District, Shenzhen, China

Telephone: +86-755-28230888 Fax: +86-755-28230886

Mail: info@uttlab.com Website: Http://www.uttlab.com

1.6 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

CNAS-Lab Code: L9069

The measuring equipment utilized to perform the tests documented in this report has been calibrated once a year or in accordance with the manufacturer's recommendations, and is traceable under the ISO/IEC/EN 17025 to international or national standards. Equipment has been calibrated by accredited calibration laboratories.

IC-Registration No.: 21600-1

The 3m Semi-anechoic chamber of Shenzhen UnionTrust Quality and Technology Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 21600-1.

A2LA-Lab Certificate No.: 4312.01

Shenzhen UnionTrust Quality and Technology Co., Ltd. has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2005 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

FCC Accredited Lab.

Designation Number: CN1194

Test Firm Registration Number: 259480



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1.7 Guidance Standard

The tests documented in this report were performed in accordance with FCC 47 CFR Part 2 §2.1093, IEEE Std 1528-2013, ANSI/IEEE C95.1-1992, the following FCC Published RF exposure KDB procedures:

KDB 865664 D01 v01r04

KDB 865664 D02 v01r02

KDB 248227 D01 v02r02

KDB 447498 D01 v06

KDB 616217 D04 v01r02

The equipment have been tested by **Shenzhen UnionTrust Quality and Technology Co., Ltd.**, and found compliance with the requirement of the above standards.



2 Specific Absorption Rate (SAR)

2.1 Introduction

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, by appropriate techniques, to produce specific absorption rates (SARs) as averaged over the whole-body, any 1 g or any 10 g of tissue (defined as a tissue volume in the shape of a cube). All SAR values are to be averaged over any six-minute period. When portable device was used within 20 cm of the user's body, SAR evaluation of the device will be required. The SAR limit in chapter 2.3.

2.2 SAR Definition

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

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

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

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

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

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

2.3 SAR Limits

(A) Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

(B) Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

Note:

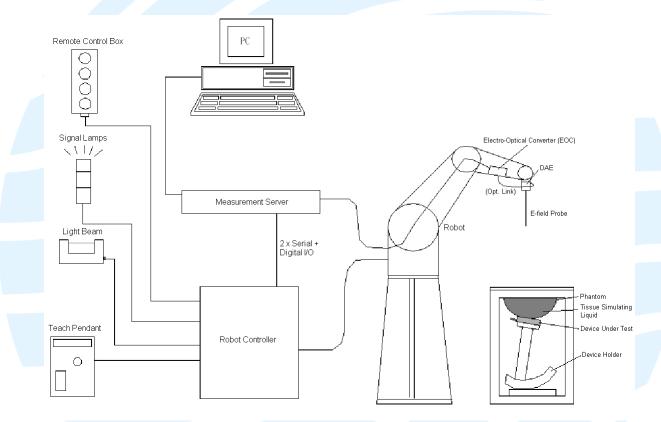
- 1. Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.
- 2. At frequencies above 6.0 GHz, SAR limits are not applicable and MPE limits for power density should be applied at 5 cm or more from the transmitting device.
- 3. The SAR limit is specified in FCC 47 CFR Part 2 §2.1093, ANSI/IEEE C95.1-1992.



3 SAR Measurement System

3.1 SPEAG DASY System

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.



DASY Measurement System

3.1.1 Robot

The DASY system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

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



3.1.2 Probe

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

Model	EX3DV4	
Construction Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).		
Frequency	10 MHz to 6 GHz	
Directivity	birectivity ± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	10 μW/g to 100 mW/g Linearity: ± 0.2 dB (noise: typically < 1 μW/g)	
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	

Model	ES3DV3	
Construction	Symmetrical design with triangular core. Interleaved sensors. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
Frequency	10 MHz to 4 GHz Linearity: ± 0.2 dB	
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.3 dB in tissue material (rotation normal to probe axis)	
Dynamic Range	5 μW/g to 100 mW/g 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: 2.0 mm	Ail

3.1.3 Data Acquisition Electronics (DAE)

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



3.1.4 Phantom

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

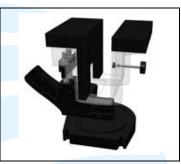
Model	ELI	
Construction	Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.	
Material	Vinylester, glass fiber reinforced (VE-GF)	
Shell Thickness	2.0 ± 0.2 mm (bottom plate)	
Dimensions	Major axis: 600 mm Minor axis: 400 mm	
Filling Volume	approx. 30 liters	



3.1.5 Device Holder

Model	Mounting Device	_
Construction	In combination with the Twin SAM Phantom or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
Material	POM	

Model	Laptop Extensions Kit
Construction	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.
Material	POM, Acrylic glass, Foam



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3.1.6 System Validation Dipoles

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



3.2 SAR Scan Procedure

3.2.1 SAR Reference Measurement (drift)

Prior to the SAR test, local SAR shall be measured at a stationary reference point where the SAR exceeds the lower detection limit of the measurement system.

3.2.2 Area Scan

Measurement procedures for evaluating the SAR of wireless device start with a coarse measurement grid to determine the approximate location of the local peak SAR values. This is known as the area-scan procedure. All antennas and radiating structures that may contribute to the measured SAR or influence the SAR distribution must be included in the area scan. The area scan measurement resolution must enable the extrapolation algorithms of the SAR system to correctly identify the peak SAR location(s) for subsequent zoom scan measurements to correctly determine the 1-g SAR. Area scans are performed at a constant distance from the phantom surface, determined by the measurement frequencies. When a measured peak is closer than ½ the zoom scan volume dimension (x, y) from the edge of the area scan region, unless the entire peak and gram-averaging volume are both captured within the zoom scan volume, the area scan must be repeated by shifting and expanding the area scan region to ensure all peaks are away from the area scan boundary. The area scan resolutions specified in the table below must be applied to the SAR measurements.

≤ 3 GHz	> 3 GHz
5 mm ± 1 mm	½·δ·ln(2) mm ± 0.5 mm
30° ± 1°	20° ± 1°
≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be \leq the corresponding x or y dimension of the test device with at least one measurement point on the	
h h	30° ± 1° ≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm Then the x or y dimension measurement plane on the above, the measurement plane on the corresponding x or

3.2.3 Zoom Scan

To evaluate the peak spatial-average SAR values with respect to 1 g or 10 g cubes, fine resolution volume scans, called zoom scans, are performed at the peak SAR locations identified during the area scan. If the cube volume within the zoom scan chosen to calculate the peak spatial-average SAR touches any boundary of the zoom-scan volume, the zoom scan shall be repeated with the center of the zoom-scan volume shifted to the new maximum SAR location. For any secondary peaks found in the area scan that are within 2 dB of the maximum peak and are not within this zoom scan, the zoom scan shall be performed for such peaks, unless the peak spatial-average SAR at the location of the maximum peak is more than 2 dB below the applicable SAR limit (i.e., 1 W/kg for a 1.6 W/kg 1 g limit, or 1.26 W/kg for a 2 W/kg 10 g limit). The zoom scan resolutions specified in the table below must be applied to the SAR measurements.

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			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}		≤ 2 GHz: ≤ 8 mm	3 – 4 GHz: ≤ 5 mm*	
		2 – 3 GHz: ≤ 5 mm*	4 – 6 GHz: ≤ 4 mm*	
				3 – 4 GHz: ≤ 4 mm
	uniform g	rid: $\Delta Z_{Zoom}(n)$	≤ 5 mm	4 – 5 GHz: ≤ 3 mm
Marrian				5 – 6 GHz: ≤ 2 mm
Maximum zoom		$\Delta Z_{Zoom}(1)$: between		3 – 4 GHz: ≤ 3 mm
Scan spatial	graded grid	1 ST two points closest	≤ 4 mm	4 – 5 GHz: ≤ 2.5 mm
resolution, normal		to phantom surface		5 – 6 GHz: ≤ 2 mm
to phantom surface		$\Delta Z_{Zoom}(n>1)$:		
		between subsequent	$\leq 1.5 \cdot \Delta Z_{Zoom}(n-1) \text{ mm}$	
		points		
Minimum				3 – 4 GHz: ≥ 28 mm
Minimum zoom	x, y, z		≥ 30 mm	4 – 5 GHz: ≥ 25 mm
scan volume				5 – 6 GHz: ≥ 22 mm

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.

3.2.4 SAR Drift Measurement

The local SAR (or conducted power) shall be measured at exactly the same location as in 3.2.1 section. The absolute value of the measurement drift (the difference between the SAR measured in 3.2.1 and 3.2.4 section) shall be recorded. The SAR drift shall be kept within $\pm 5\%$.

^{*} When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB Publication 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.





3.3 Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Cal. Interval
System Validation Dipole	SPEAG	D2450V2	809	Mar. 22, 2018	3 Year
Dosimetric E-Field Probe	SPEAG	ES3DV3	3240	Mar. 28, 2018	1 Year
Data Acquisition Electronics	SPEAG	DAE3	420	Mar. 22, 2018	1 Year
Wideband Radio Communication Tester	R&S	CMW500	116254	Dec. 10, 2017	1 Year
ENA Series Network Analyzer	Agilent	8753ES	MY40000519	Sep. 28, 2017	1 Year
EXG-B RF Analog Signal Generator	KEYSIGHT	N5171B	MY53051777	Dec. 10, 2017	1 Year
USB Wideband Power Sensor	KEYSIGHT	U2021XA	MY55430035	Dec. 10, 2017	1 Year
USB Wideband Power Sensor	KEYSIGHT	U2021XA	MY55430023	Dec. 10, 2017	1 Year
Thermometer	Shanghai Gao Zhi Precision Instrument Co., Ltd.	HB6801	120100323	Mar. 29, 2018	1 Year



3.4 Measurement Uncertainty

Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.





3.5 Tissue Dielectric Parameter Measurement & System Verification

3.5.1 Tissue Simulating Liquids

The temperature of the tissue-equivalent medium used during measurement must also be within 18 °C to 25 °C and within ± 2 °C of the temperature when the tissue parameters are characterized. The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 - 4 days of use; or earlier if the dielectric parameters can become out of tolerance.

The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm with ≤ ± 0.5 cm variation for SAR measurements ≤ 3 GHz and ≥ 10.0 cm with ≤ ± 0.5 cm variation for measurements > 3 GHz. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.



Photo of Liquid Height

Table-3.1 Tissue Dielectric Parameters for Head and Body

Target Frequency		ead		ody
(MHz)	Er	σ (S/m)	Er	σ (S/m)
750	41.9	0.89	55.5	0.96
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
1450	40.5	1.20	54.0	1.30
1640	40.3	1.29	53.8	1.40
1750	40.1	1.37	53.4	1.49
1800	40.0	1.40	53.3	1.52
1900	40.0	1.40	53.3	1.52
2000	40.0	1.40	53.3	1.52
2300	<i>39.5</i>	1.67	52.9	1.81
2450	39.2	1.80	52.7	1.95
2600	39.0	1.96	52.5	2.16
3500	37.9	2.91	51.3	3.31
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5800	35.3	5.27	48.2	6.00
	(εr = relative perm	ittivity, σ = conductivity an	$d \rho = 1000 \text{ kg/m3}$	·



The following table gives the recipes for tissue simulating liquids.

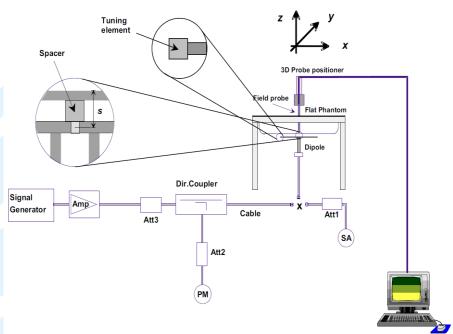
Table-3.2 Recipes of Tissue Simulating Liquid

Table-3.2 Recipes of Tissue Simulating Liquid										
Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono- hexylether		
H750	0.2	-	0.2	1.4	57.0	-	41.1	-		
H835	0.1	-	1.0	1.4	57.0	-	40.5	-		
H900	0.1	-	1.0	1.5	56.5	-	40.9	-		
H1450	-	45.5	-	0.7	-	-	53.8	-		
H1640	-	45.8	-	0.5	-	-	53.7	-		
H1750	-	44.5	-	0.3	-	-	55.2	-		
H1800	-	44.9	-	0.2	-	-	54.9	-		
H1900	-	44.9	-	0.2	-	-	54.9	-		
H2000	-	50	-	_	-	-	50	-		
H2300	-	44.9	-	0.1	-	-	55.0	-		
H2450	-	45.0	-	0.1	-	_	54.9	-		
H2600	-	45.1	-	0.1	-	-	54.8	-		
H3500	-	8.0	-	0.2	-	20.0	71.8	-		
H5G	-	-	-	-	-	17.2	65.52	17.3		
B750	0.2	-	0.2	0.8	48.8	-	50.0	-		
B835	0.2	-	0.2	0.9	48.5	-	50.2	-		
B900	0.2	-	0.2	0.9	48.2	-	50.5	-		
B1450	-	34.0	-	0.3	-	-	65.7	-		
B1640	-	32.5	-	0.3	-	-	67.2	-		
B1750	-	29.4	-	0.4	-	-	70.2	_		
B1800	-	29.5	-	0.4	-	-	70.1	-		
B1900	-	29.5	-	0.3	-	-	70.2	-		
B2000	-	30.0	-	0.2	-	-	69.8	-		
B2300	-	31.0	-	0.1	-	-	68.9	-		
B2450	-	31.4	-	0.1	-	-	68.5	-		
B2600	-	31.8	-	0.1	-	-	68.1	-		
B3500	-	28.8	-	0.1	-	-	71.1	-		
B5G	-	-	-	-	-	10.7	78.6	10.7		



3.5.2 System Check Description

The system check procedure provides a simple, fast, and reliable test method that can be performed daily or before every SAR measurement. The objective here is to ascertain that the measurement system has acceptable accuracy and repeatability. This test requires a flat phantom and a radiating source. The system verification setup is shown as below.



System Verification Setup



3.5.3 Tissue Verification

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

Test Date	Tissue Type	Frequency (MHz)	Liquid Temp. (°C)	Measured Conductivity (σ)	Measured Permittivity (ε _r)	Target Conductivity (σ)	Target Permittivity (ε _r)	Conductivity Deviation (%)	Permittivity Deviation (%)
Apr. 27, 2018	Body	2450	22.6	1.971	51.743	1.95	52.70	1.08	-1.82

Note:

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within \pm 5% of the target values. The variation of the liquid temperature must be within \pm 2 °C during the test.

3.5.4 System Verification

The measuring result for system verification is tabulated as below.

Test Date	Tissue Type	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Apr. 27, 2018	Body	2450	50.70	0.48	47.80	-5.72	809	3240	420

Note:

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



4 SAR Measurement Evaluation

4.1 EUT Configuration and Setting

4.1.1 WLAN Configuration and Testing

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

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

Initial Test Configuration

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

Subsequent Test Configuration

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. When the highest reported SAR for the initial test configuration according to the initial test position or fixed exposure position requirements, is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

SAR Test Configuration and Channel Selection

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



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maximum output power, the channel chosen for SAR measurement is determined according to the following.

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





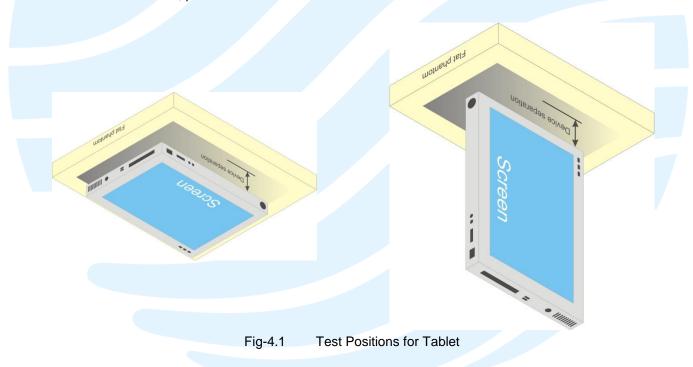
4.2 EUT Testing Position

4.2.1 Body Exposure Conditions

RF Exposure Conditions	Test Position	Separation Distance	SAR test exclusion
	Rear Face		
	Left Side		
Body	Right Side	0 cm	Note 4
-	Top Side		
	Bottom Side		

Note:

- Exposures from antennas through the front surface of the display section of a tablet are generally limited to
 the user's hands. Exposures to hands for typical consumer transmitters used in tablets are not expected to
 exceed the extremity SAR limit; therefore, SAR evaluation for the front surface of tablet display screens are
 generally not necessary.
- 2. When voice mode is supported on a tablet and it is limited to speaker mode or headset operations only, additional SAR testing for this type of voice use is not required.
- 3. Next to the ear operation is generally not expected for tablets with overall diagonal dimension > 20 cm. However, when next to the ear voice mode is supported, regardless of the overall dimension, phablets must be tested according to the requirements described in KDB Publication 648474 D04.
- 4. For SAR test exclusion, please refer to section 4.4.





4.3 Measured Conducted Power Result

4.3.1 Conducted Power of WLAN

Mo	ode	Channel	Frequency (MHz)	Average Power (dBm)	
	1		2412	9.25	
	802.11b	6	2437	9.87	
		11	2462	9.80	
		1	2412	6.98	
	802.11g	6	2437	7.23	
0.40		11	2462	7.14	
2.4G	000.44	1	2412	7.11	
	802.11n	6	2437	7.23	
	(HT20)	11	2462	6.82	
	000 44 =	3	2422	6.99	
	802.11n	6	2437	7.12	
	(HT40)	9	2452	6.89	



4.4 SAR Test Exclusion Evaluations

4.4.1 Standalone SAR Test Exclusion Considerations

According to KDB 447498 D01, the SAR test exclusion condition is based on source-based time-averaged maximum conducted output power, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The 1-g and 10-g SAR test exclusion thresholds are determined by the following:

a) For 100 MHz to 6 GHz and test separation distances ≤ 50 mm:

$$\frac{\textit{Max.Tune up Power}_{(\textit{mW})}}{\textit{Min.Test Separation Distance}_{(\textit{mm})}} \times \sqrt{f_{(GHz)}} \leq 3.0 \text{ for SAR-1g, } \leq 7.5 \text{ for SAR-10g}$$

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

b) For 100 MHz to 1500 MHz and test separation distances > 50 mm:

{[Threshold for 50 mm in step a)] + [(test separation distance – 50 mm) \cdot (f_(MHz)/150)]} mW

c) For > 1500 MHz and ≤ 6 GHz and test separation distances > 50 mm:

{[Threshold for 50 mm in step a)] + [(test separation distance - 50 mm) ·10]} mW

When the calculated result in step a) is <= 3.0 for SAR-1g exposure condition, or <= 7.5 for SAR-10g exposure condition, the SAR testing exclusion is applied.

When the device output power is less than the calculated result (power threshold, mW) shown in in step b) and c), the SAR testing exclusion is applied.

4.4.2 Estimated SAR Calculation

According to KDB 447498 D01, when an antenna qualifies for the standalone SAR test exclusion and also transmits simultaneously with other antennas, the standalone SAR value must be estimated according to the following to determine the simultaneous transmission SAR test exclusion criteria:

a) For test separation distances ≤ 50 mm:

Estimated SAR =
$$\frac{Max.Tune\ up\ Power_{(mW)}}{Min.Test\ Separation\ Distance_{(mm)}} \times \frac{\sqrt{f(_{GHz})}}{x}$$

Where x = 7.5 for 1-g SAR and x = 18.75 for 10-g SAR.

b) For test separation distances > 50 mm, 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR.



4.5 SAR Testing Results

4.5.1 SAR Test Reduction Considerations

KDB 447498 D01 General RF Exposure Guidance

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

- a) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- b) ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- c) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

KDB 248227 D01 Wi-Fi SAR

- a) For handsets operating next to ear, hotspot mode or mini-tablet configurations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When the reported SAR of initial test position is <= 0.4 W/kg, SAR testing for remaining test positions is not required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is <= 0.8 W/kg or all test positions are measured.
- b) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is <= 0.8 W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n), SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is <= 1.2 W/kg.



4.5.2 SAR Results for Body Exposure Condition (Separation Distance is 0 cm)

Plot No.	Band	Mode	Test Position	Ch.	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Power Drift (dB)	Measured SAR-1g (W/kg)	Scaling Factor	Scaled SAR-1g (W/kg)
P01	802.11b	-	Rear Face	6	11.5	9.87	0.01	0.134	1.46	0.20

4.6 SAR Measurement Variability

4.6.1 Repeated Measurement

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are ≤ 1.45 W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is ≤ 1.10, the highest SAR configuration for either head or body tissue-equivalent medium 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.
- 3. If the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20, or when the original or repeated measurement is >= 1.45 W/kg, perform a second repeated measurement.
- 4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20, and the original, first or second repeated measurement is >= 1.5 W/kg, perform a third repeated measurement.

All the measured SAR are less than 0.8 W/kg, so the repeated measurement is not required.

4.6.2 DUT Holder Perturbations

Depending on antenna locations, buttons locations on phones or device, form factor (e.g. dongles etc.), the measured SAR could be influenced by the relative positions of the test device and its holder.

When the highest reported SAR of an antenna is > 1.2 W/kg, holder perturbation verification is required, using the highest SAR configuration among all applicable frequency bands with and without the device holder.

All the measured SAR are less than 1.2 W/kg, so the holder perturbation verification is not required.



4.7 Simultaneous Multi-band Transmission Evaluation

4.7.1 Simultaneous Transmission SAR Test Exclusion Considerations

a) Sum of SAR

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

b) SAR to Peak Location Separation Ratio

The simultaneous transmitting antennas in each operating mode and exposure condition combination are considered one pair at a time to determine the SPLSR.

$$SPLSR = (SAR_1 + SAR_2)^{1.5}/R_i$$

The ratio is rounded to two decimal digits, and must be ≤ 0.04 for all antenna pairs in the configuration to qualify for 1-g SAR test exclusion. When 10-g SAR applies, the ratio must be ≤ 0.10 .

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

peak location separation distance =
$$\sqrt{(x_1 - x_2)^2 + (y_1 - y_2)^2 + (z_1 - z_2)^2}$$

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

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

When SAR is estimated for both antennas, the peak location separation should be determined by the closest physical separation of the antennas, according to the feed-point or geometric center of the antennas.

c) Volume Scan

When the SPLSR is <= 0.04 for 1-g SAR and <= 0.10 for 10-g SAR, the simultaneous transmission SAR is not required. Otherwise, the enlarged zoom scan and volume scan post-processing procedures will be performed.

4.7.2 Simultaneous Transmission Possibilities

The WLAN and Bluetooth cannot transmit simultaneously, so there is no co-location test requirement for WLAN and Bluetooth.



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*** End of Report ***

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Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.



System Check B2450

DUT: Dipole 2450 MHz D2450V2

Communication System: UID 0, CW (0); Frequency: 2450 MHz; Duty Cycle: 1:1 Medium: MSL2450 Medium parameters used: f = 2450 MHz; $\sigma = 1.971$ S/m; $\epsilon_r = 51.743$; $\rho = 1000$ kg/m³

DASY5 Configuration:

- Probe: ES3DV3 SN3240; ConvF(4.57, 4.57, 4.57); Calibrated: 3/28/2018;
- Sensor-Surface: 3mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn420; Calibrated: 3/22/2018
- Phantom: SAM 1; Type: QD000P40CC; Serial: TP:1469
- Measurement SW: DASY52, Version 52.8 (8); SEMCAD X Version 14.6.10 (7373)

Configuration/Configuration/Area Scan (81x81x1): Interpolated grid: dx=1.200 mm, dy=1.200 mm

Maximum value of SAR (interpolated) = 0.596 W/kg

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

Reference Value = 17.51 V/m; Power Drift = 0.02 dB

Peak SAR (extrapolated) = 0.981 W/kg

SAR(1 g) = 0.478 W/kg; SAR(10 g) = 0.202 W/kg

Maximum value of SAR (measured) = 0.598 W/kg

