TEST REPORT

WTX22X01001654W

FCC ID..... 2A28A-WM Applicant Thesis Ltd. Address..... Retkoz utca 67. fsz. 2., Budapest, Hungary 1112 Product Name **Nucleus** Test Model..... NucleusWM FCC Part 2.1093. Standards IEEE Std C95.1: 2019 IEEE Std C95.3: 2002 + Rev. 2008 Date of Receipt sample Jan. 05, 2022 Date of Test..... Jan. 05, 2022 to Jan. 10, 2022 Date of Issue Jan. 11, 2022 Test Result..... **Pass** Remarks: The results shown in this test report refer only to the sample(s) tested, this test report cannot be reproduced, except in full, without prior written permission of the company. The report would be invalid without specific stamp of test institute and the signatures of compiler and approver. Prepared By: Waltek Testing Group (Shenzhen) Co., Ltd. Address: 1/F., Room 101, Building 1, Hongwei Industrial Park, Liuxian 2nd Road, Block 70 Bao'an District, Shenzhen, Guangdong, China Tel.: +86-755-33663308 Fax.: +86-755-33663309 Tested by: Reviewed By: Approved & Authorized By: Jack Sun / Project Engineer Jason Su / RF Manager Silin Chen / Manager

Reference No.....

TABLE OF CONTENTS

1. General Information	
1.1 Product Description for Equipment Under Test (EUT)	
1.2 Test Standards	
1.3 Test Methodology	
1.4 Test Facility	
2. Summary of Test Results	7
3. Specific Absorption Rate (SAR)	8
3.1 Introduction	8
3.2 SAR Definition	
4. SAR Measurement System	
4.1 The Measurement System	9
4.2 Probe	
4.3 Probe Calibration Process	
4.4 Phantom	
4.5 Device Holder	
4.6 Test Equipment List	
5. Tissue Simulating Liquids	
5.1 Composition of Tissue Simulating Liquid	
5.2 Tissue Dielectric Parameters for Head and Body Phantoms	
5.3 Tissue Calibration Result	
6. SAR Measurement Evaluation	
6.1 Purpose of System Performance Check	
6.2 System Setup	
6.3 Validation Results	
7. EUT Testing Position	
7.1 EUT Antenna Position	
7.2 EUT Testing Position	
8. SAR Measurement Procedures	
8.1 Measurement Procedures	
8.2 Spatial Peak SAR Evaluation	
8.3 Area & Zoom Scan Procedures	
8.4 Volume Scan Procedures	
8.5 SAR Averaged Methods	
9. SAR Test Result	
9.1 Conducted RF Output Power	
9.2 Test Results for Standalone SAR Test	
•	
10. Measurement Uncertainty	
10.1 Uncertainty for SAR Test	
Annex A. Plots of System Performance Check	
Annex B. Plots of SAR Measurement	
Annex C. EUT Photos	
Annex D. Test Setup Photos	35
Anney F. Calibration Certificate	37

Reference No.: WTX22X01001654W Page 3 of 37

Report version

Version No.	Date of issue	Description
Rev.00	Jan. 11, 2022	Original
/	/	/

Reference No.: WTX22X01001654W Page 4 of 37

1. General Information

1.1 Product Description for Equipment Under Test (EUT)

Client Information

Applicant: Thesis Ltd.

Address of applicant: Retkoz utca 67. fsz. 2., Budapest, Hungary 1112

Manufacturer: Thesis Ltd.

Address of manufacturer: Retkoz utca 67. fsz. 2., Budapest, Hungary 1112

General Description of	General Description of EUT:				
Product Name:	Nucleus				
Trade Name:	/				
Model No.:	NucleusWM				
Adding Model:	/				
Rated Voltage:	USB Port:DC5V; Battery:DC3.7V				
Battery capacity:	1100mAh				
Software Version:	/				
Hardware Version:	/				
	•				
Note: The test data is gathere	d from a production sample provided by the manufacturer.				

Reference No.: WTX22X01001654W Page 5 of 37

Technical Characteristics of E	EUT:
WIFI(2.4G)	
Support Standards:	802.11b, 802.11g, 802.11n-HT20/ HT40
Frequency Range:	2412-2462MHz for 802.11b/g/n(HT20),
Frequency Kange.	2422-2452MHz for 802.11n(HT40)
RF Output Power:	18.01dBm (Conducted)
Type of Modulation:	DBPSK,BPSK,DQPSK,QPSK,16QAM,64QAM
Data Rate:	1-11Mbps, 6-54Mbps, up to 150Mbps
Quantity of Channels:	11 for 802.11b/g/n-HT20, 7 for 802.11n-HT40
Channel Separation:	5MHz
Antenna Type:	PCB Antenna
Antenna Gain:	3.7dBi
Bluetooth	
Bluetooth Version:	V5.1(Only BLE)
Frequency Range:	2402-2480MHz
RF Output Power:	0.124dBm (Conducted)
Data Rate:	1Mbps, 2Mbps
Modulation:	GFSK
Quantity of Channels:	40
Channel Separation:	2MHz
Antenna Type:	PCB Antenna
Antenna Gain:	0dBi
Note: The Antenna Gain is prov	ided by the customer.

1.2 Test Standards

The following report is accordance with FCC 47 CFR Part 2.1093, IEEE Std C95.1: 2019, IEEE Std C95.3: 2002 + Rev. 2008, IEEE 62209-1528: 2020, and KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02 and KDB 616217 D04 v01r02 and 248227 D01 802 11 Wi-Fi SAR v02r02.

The objective is to determine compliance with FCC Part 2.1093 of the Federal Communication Commissions rules.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product, which result in lowering the emission, should be checked to ensure compliance has been maintained.

1.3 Test Methodology

All measurements contained in this report were conducted with KDB 865664 D01 v01r04 and KDB 865664 D02 v01r02. The public notice KDB 447498 D01 v06 for Mobile and Portable Devices RF Exposure Procedure also.

1.4 Test Facility

Address of the test laboratory

Laboratory: Waltek Testing Group (Shenzhen) Co., Ltd.

Address: 1/F., Room 101, Building 1, Hongwei Industrial Park, Liuxian 2nd Road, Block 70 Bao'an District, Shenzhen, Guangdong, China

FCC - Registration No.: 125990

Waltek Testing Group (Shenzhen) Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the FCC (Federal Communications Commission). The acceptance letter from the FCC is maintained in our files. The Designation Number is CN5010. Test Firm Registration Number is 125990.

Industry Canada (IC) Registration No.: 11464A

The 3m Semi-anechoic chamber of Waltek Testing Group (Shenzhen) Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 11464A.

Reference No.: WTX22X01001654W Page 7 of 37

2. Summary of Test Results

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

Frequency Band	Body (0mm Gap) Maximum SAR _{1g} (W/kg)	SAR _{1g} Limit (W/kg)
WLAN 2.4GHz	0.420	1.6
Simultaneous Transmission	0.467	1.6

Remark:

The device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2.1093 and ANSI/IEEE C95.1-2005+A1:2010, and had been tested in accordance with the measurement methods and procedure specified in KDB 865664 D01 v01r04, KDB 865664 D02 v01r02 and IEC 62209-2:2010+AMD1 (2019).

3. Specific Absorption Rate (SAR)

3.1 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 techiques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

3.2 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 either related to the temperature elevation in tissue by

$$SAR = C\left(\frac{\delta T}{\delta t}\right)$$

Where: C is the specific heat capacity, δ T is the temperature rise and δ t is the exposure duration, or 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.

However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

Reference No.: WTX22X01001654W Page 9 of 37

4. SAR Measurement System

4.1 The Measurement System

Comosar is a system that is able to determine the SAR distribution inside a phantom of human being according to different standards. The Comosar system consists of the following items:

- Main computer to control all the system
- 6 axis robot
- Data acquisition system
- Miniature E-field probe
- Phone holder
- Head simulating tissue

The following figure shows the system.



The EUT under test operating at the maximum power level is placed in the phone holder, under the phantom, which is filled with head simulating liquid. The E-Field probe measures the electric field inside the phantom. The OpenSAR software computes the results to give a SAR value in a 1g or 10g mass.

4.2 Probe

For the measurements the Specific Dosimetric E-Field Probe SSE2 SN 45/15 EPGO280 with following specifications is used

- Dynamic range: 0.01-100 W/kg

- Probe Length: 330 mm

Length of Individual Dipoles: 4.5 mmMaximum external diameter: 8 mm

Reference No.: WTX22X01001654W Page 10 of 37

- Probe Tip External Diameter : 5 mm

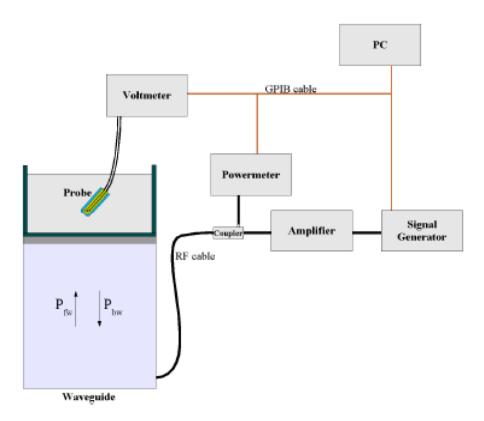
- Distance between dipoles / probe extremity: 2.7mm

- Probe linearity: <0.25 dB
- Axial Isotropy: <0.25 dB
- Spherical Isotropy: <0.50 dB

- Calibration range: 700 to 3000MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and suface normal line:1ess than 30°

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



$$SAR = \frac{4\left(P_{fw} - P_{bw}\right)}{ab\delta}\cos^2\left(\pi\frac{y}{a}\right)e^{-(2z/\delta)}$$

Where:

Pfw = Forward Power Pbw = Backward Power

a and b = Waveguide dimensions

I = Skin depth

Keithley configuration:

Reference No.: WTX22X01001654W Page 11 of 37

Rate = Medium; Filter = ON; RDGS = 10; Filter type = Moving Average; Range auto after each calibration, a SAR measurement is performed on a validation dipole and compared with a NPL calibrated probe, to verify it.

The calibration factors, CF(N), for the 3 sensors corresponding to dipole 1, dipole 2 and dipole 3 are:

$$CF(N)=SAR(N)/Vlin(N)$$
 (N=1,2,3)

The linearised output voltage Vlin(N) is obtained from the displayed output voltage V(N) using

$$Vlin(N)=V(N)*(1+V(N)/DCP(N)) (N=1,2,3)$$

where DCP is the diode compression point in mV.

4.3 Probe Calibration Process

Dosimetric Assessment Procedure

Each E-Probe/Probe Amplifier combination has unique calibration parameters. SATIMO Probe calibration procedure is conducted to determine the proper amplifier settings to enter in the probe parameters. The amplifier settings are determined for a given frequency by subjecting the probe to a known E-field density (1 mW/cm2) using an with CALISAR, Antenna proprietary calibration system.

Free Space Assessment Procedure

The free space E-field from amplified probe outputs is determined in a test chamber. This calibration can be performed in a TEM cell if the frequency is below 1 GHz and in a waveguide or other methodologies above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is rotated 360 degrees until the three channels show the maximum reading. The power density readings equates to 1mW/cm2.

Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated head tissue. The E-field in the medium correlates with the temperature rise in the dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

SAR =
$$C\frac{\Delta T}{\Delta t}$$
 $\Delta t = \text{exposure time (30 seconds)},$ $C = \text{heat capacity of tissue (brain or muscle)},$ $\Delta T = \text{temperature increase due to RF exposure}.$

SAR is proportional to $\Delta T/\Delta t$, the initial rate of tissue heating, before thermal diffusion takes place. The electric

Reference No.: WTX22X01001654W Page 12 of 37

field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

SAR =
$$\frac{|\mathbf{E}|^2 \cdot \sigma}{\rho}$$
Where:
$$\sigma = \text{simulated tissue conductivity,}$$

$$\rho = \text{Tissue density (1.25 g/cm3 for)}$$

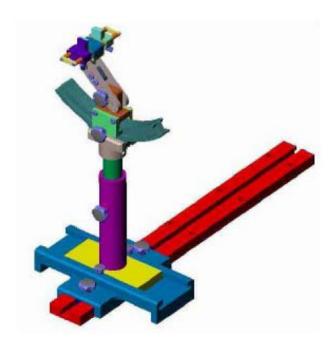
 ρ = Tissue density (1.25 g/cm3 for brain tissue)

4.4 Phantom

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

4.5 Device Holder

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



System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

Reference No.: WTX22X01001654W Page 13 of 37

4.6 Test Equipment List

Description	Manufacturer	Model	Serial Number	Cal. Date	Due. Date
E-Field Probe	MVG	SSE5	SN 09/13 EP168	2020-05-22	2022-05-21
E-Field Probe	MVG	SSE2	SN 18/21 EPGO356	2021-07-16	2022-07-15
835MHz Dipole	MVG	SID835	SN 47/12 DIP 0G835-204	2020-03-11	2022-03-10
1800MHz Dipole	MVG	SID1800	SN 47/12 DIP 1G800-206	2020-03-11	2022-03-10
1900MHz Dipole	MVG	SID1900	SN 47/12 DIP 1G900-207	2020-03-11	2022-03-10
2450MHz Dipole	MVG	SID2450	SN 13/15 DIP 2G450-364	2020-03-11	2022-03-10
2600MHz Dipole	MVG	SID2600	SN 28/21 DIP 2G600-590	2021-07-16	2024-07-15
3300MHz Dipole	MVG	SID3300	SN 28/21 DIP 3G300-591	2021-07-19	2024-07-18
3500MHz Dipole	MVG	SID3500	SN 28/21 DIP 3G500-592	2021-07-19	2024-07-18
3700MHz Dipole	MVG	SID3700	SN 28/21 DIP 3G700-593	2021-07-19	2024-07-18
3900MHz Dipole	MVG	SID3900	SN 28/21 DIP 3G900-594	2021-07-19	2024-07-18
4200MHz Dipole	MVG	SID4200	SN 28/21 DIP 4G200-595	2021-07-19	2024-07-18
4600MHz Dipole	MVG	SID4600	SN 28/21 DIP 4G600-596	2021-07-19	2024-07-18
4900MHz Dipole	MVG	SID4900	SN 28/21 DIP 4G900-597	2021-07-19	2024-07-18
5 GHz Dipole	MVG	SWG5500	SN 49/16 WGA45	2020-07-03	2022-07-02
Dielectric Probe	SATIMO	SCLMP	SN 47/12 OCPG49	2020-03-11	2022-03-10
SAM Phantom	SATIMO	SAM	SN/ 47/12 SAM95	N/A	N/A
Multi Meter	Keithley	Keithley 2000	4006367	2021-03-27	2022-03-26
Power meter	Keithley	3500	JC-2017-09-001	2021-03-27	2022-03-26
Power meter	Keithley	3500	JC-2017-09-001	2021-03-27	2022-03-26
Power Sensor	HP	11636B	JC-2017-10-002	2021-03-27	2022-03-26
MXG X-Series RF Vector Signal Generato	KEYSIGHT	N5182B	MY57300664	2021-04-14	2022-04-13
Universal Tester	Rohde & Schwarz	CMU200	112315	2021-03-27	2022-03-26
Communications Tester	Rohde & Schwarz	CMW500	148650	2021-03-27	2022-03-26
Network Analyzer	HP	8753C	2901A00831	2021-03-27	2022-03-26
Directional Couplers	Agilent	778D	20160	2021-03-27	2022-03-26

Reference No.: WTX22X01001654W Page 14 of 37

5. Tissue Simulating Liquids

5.1 Composition of Tissue Simulating Liquid

For the measurement of the field distribution inside the SAM phantom with SMTIMO, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. Please see the following photos for the liquid height.



Liquid Height for Body SAR

The Composition of Tissue Simulating Liquid

Frequency	Water	Salt	Sugar	HEC	Preventol	DGBE
(MHz)	(%)	(%)	(%)	(%)	(%)	(%)
Body						
2450	68.6	0.1	0	0	0	31.3

Reference No.: WTX22X01001654W Page 15 of 37

5.2 Tissue Dielectric Parameters for Head and Body Phantoms

The IEEE Std. 1528, FCC KDBs and CEI/IEC 62209 standards state that the system validation measurements must be performed using a reference dipole meeting the fore mentioned return loss and mechanical dimension requirements. The validation measurement must be performed against a liquid filled flat phantom, with the phantom constructed as outlined in the fore mentioned standards. Per the standards, the dipole shall be positioned below the bottom of the phantom, with the dipole length centered and parallel to the longest dimension of the flat phantom, with the top surface of the dipole at the described distance from the bottom surface of the phantom.

To and Europe	Body				
Target Frequency	Conductivity	Permittivity			
(MHz)	(σ)	(\mathcal{E}_{r})			
150	0.80	61.9			
300	0.92	58.2			
450	0.94	56.7			
750	0.96	55.5			
835	0.97	55.2			
900	1.05	55.0			
915	1.06	55.0			
1450	1.30	54.0			
1610	1.40	53.8			
1800-2000	1.52	53.3			
2450	1.95	52.7			
3000	2.73	52.0			
5200	5.30	49.0			
5400	5.53	48.7			
5600	5.77	48.5			
5800	6.00	48.2			

Reference No.: WTX22X01001654W Page 16 of 37

5.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using COMOSAR Dielectric Probe Kit and an Agilent Network Analyzer.

Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

	Body Tissue Simulating Liquid										
Emag	Тотт	Conductivity		Permittivity			T ::4				
Freq. MHz.	Temp.	Reading	Target	Delta	Reading	Target	Delta	Limit (%)	Date		
MITIZ.	(0)	(σ)	(σ)	(%)	$(\mathcal{E}\mathbf{r})$	$(\mathcal{E}\mathbf{r})$	(%)	(70)			
2450	21.3	1.93	1.95	-1.03	52.61	52.7	-0.17	±5	2022-01-10		

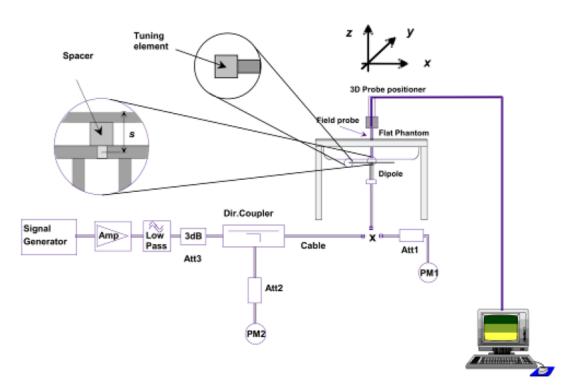
6. SAR Measurement Evaluation

6.1 Purpose of System Performance Check

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

6.2 System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator at frequency 2450MHz and 5000MHz. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom.



System Verification Setup Block Diagram



Setup Photo of Dipole Antenna

The output power on dipole port must be calibrated to 24 dBm(250 mW) before dipole is connected. The output power on 5 GHz Waveguide must be calibrated to 20 dBm (100 mW) before 5 GHz Waveguide is connected.

6.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. Table 6.1 shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion.

Frequency	Power	Targeted SAR _{1g}	Measured SAR _{1g}	Normalized SAR _{1g}	Tolerance	Date
MHz	(mw)	(W/kg)	(W/kg)	(W/kg)	(%)	
	Body					
2450	50.33	12.59	50.36	0.06	2450	2022-01-10

Targeted and Measurement SAR

Please refer to Annex A for the plots of system performance check.

Reference No.: WTX22X01001654W Page 19 of 37

7. EUT Testing Position

7.1 EUT Antenna Position

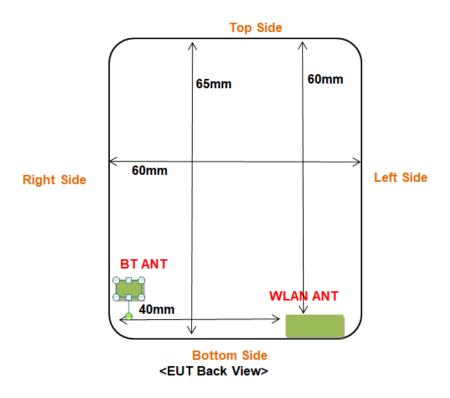


Fig 7.1 Block Diagram for EUT Antenna Position

7.2 EUT Testing Position

Distance of EUT antenna-to-edge/surface(mm),									
	Test distance:0mm								
Antennas	Antennas Back side Front side Left Edge Right Edge Top Edge Bottom Edge								
WLAN	<25	<25	<25	40	60	<25			

Remark:

- 1. Referring to KDB 447498 D01v06, the distance of the antennas to all adjacent edges SAR test exclusion for adjacent edges.
- 2. For tablet with overall diagonal dimension >20cm, SAR testing for front surface of the display section is exempted according to KDB616217 D04.

Body mode SAR assessments are required for this device. This EUT was tested in different positions for different SAR test modes, more information as below:

Reference No.: WTX22X01001654W Page 20 of 37

Body SAR tests, Test distance: 0mm								
Antennas Front Back Left Right Top Side Bottom								
WLAN(2.4G) No Yes Yes No No No								

Remark:

- 1. Referring to KDB 616217 D04 v01r02, KDB 248227 D01 v02r02 and KDB 447498 D01 v06, this device is overall diagonal dimension(>20cm) tablet, tested in direct contact (no gap) with flat phantom.
- 2. Referring to KDB 616217 D04 v01r02, Exposures from antennas through the front (top) surface of the display section of a full-size tablet, away from the edges, 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.

Please refer to Annex D for the EUT test setup photos.

Reference No.: WTX22X01001654W Page 21 of 37

8. SAR Measurement Procedures

8.1 Measurement Procedures

The measurement procedures are as follows:

- (a) Use base station simulator (if applicable) or engineering software to transmit RF power continuously (continuous Tx) in the highest power channel.
- (b) Keep EUT to radiate maximum output power or 100% factor (if applicable)
- (c) Measure output power through RF cable and power meter.
- (d) Place the EUT in the positions as Annex D demonstrates.
- (e) Set scan area, grid size and other setting on the SATIMO software.
- (f) Measure SAR results for the highest power channel on each testing position.
- (g) Find out the largest SAR result on these testing positions of each band
- (h) Measure SAR results for other channels in worst SAR testing position if the SAR of highest power channel is larger than 0.8 W/kg

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

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

8.2 Spatial Peak SAR Evaluation

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

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

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

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

Reference No.: WTX22X01001654W Page 22 of 37

8.3 Area & Zoom Scan Procedures

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan measures 5x5x7 points with step size 8, 8 and 5 mm for 300 MHz to 3 GHz, and 8x8x8 points with step size 4, 4 and 2.5 mm for 3 GHz to 6 GHz. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g.

8.4 Volume Scan Procedures

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing (step-size is 4, 4 and 2.5 mm). When all volume scan were completed, the software can combine and subsequently superpose these measurement data to calculating the multiband SAR.

8.5 SAR Averaged Methods

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is using to determinate this highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10g and 1 g requires a very fine resolution in the three dimensional scanned data array.

8.6 Power Drift Monitoring

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

9. SAR Test Result

9.1 Conducted RF Output Power

	WLAN(2.4G) - Conducted Power										
Test Mode	Data Rate	Channel	Frequency (MHz)	Average Power (dBm)	Tune-up power (dBm)						
		CH 01	2412	17.64	18.0						
802.11b	1Mbps	CH 06	2437	18.01	18.5						
		CH 11	2462	17.99	18.0						
		CH 01	2412	17.85	18.0						
802.11g	6Mbps	CH 06	2437	17.67	18.0						
		CH 11	2462	17.77	18.0						
902.11		CH 01	2412	16.77	17.0						
802.11n	MCS0	CH 06	2437	18.00	18.5						
(20MHz)		CH 11	2462	17.76	18.0						
902 11n		CH 03	2422	16.06	16.5						
802.11n	MCS0	CH 06	2437	17.66	18.0						
(40MHz)		CH 09	2452	17.19	17.5						

Remark:

- 1. Per KDB 248227 D01 v02r02, For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions.
- 2. Per KDB 248227 D01 v02r02, For 802.11b DSSS SAR measurements ,when the reported SAR of the highest measured maximum output power channel (see 3.1) for the exposure configuration is \leq 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration. When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel; i.e., all channels require testing.
- 3 .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 <= 1.2W/kg.

Reference No.: WTX22X01001654W Page 24 of 37

	Bluetooth - Maximum Average Power										
Test Mode	Data Rate	Channel	Frequency (MHz)	Average Power (dBm)							
		CH 00	2402	-1.688							
	1Mbps	CH 19	2440	-0.956							
BLE		CH 39	2480	-0.085							
DLE		CH 00	2402	-1.645							
	2Mbps	CH 19	2440	-0.926							
		CH 39	2480	0.124							

Remark:

Bluetooth maximum output power is 0.124dBm, Maximum Tune-Up output power is 0.5dBm. Per KDB 447498 D01 V06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] \cdot [$\sqrt{f(GHz)}$] \leq 3.0 for 1-g SAR and \leq 7.5 for 10-g extremity SAR,16 where

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation17
- The result is rounded to one decimal place for comparison

Bluetooth:

Tune-Up Power (dBm)	Max. Power (mW)	Distance (mm)	Frequency (GHz)	Result	Limit
0.5	1.12	5	2.480	0.35	3

The exclusion thresholds is 0.35<3, therefore, the RF exposure evaluation is not required.

Reference No.: WTX22X01001654W Page 25 of 37

9.2 Test Results for Standalone SAR Test

Body SAR

	WLAN 2.4GHz– Body SAR Test(0 mm)										
Plot		Test	Fre	quency	Output	Rated	Scaling	SAR1g	Scaled		
No.	Mode	Position	СН.	MHz	Power	Limit	Factor	(W/kg)	SAR1g		
110.		Body	CII.	WIIIZ	(dBm)	(dBm)	ractor	(W/Kg)	(W/kg)		
	802.11b	Back Face	06	2437	18.01	18.5	1.119	0.111	0.124		
1.	802.11b	Front Face	06	2437	18.01	18.5	1.119	0.375	0.420		
	802.11b	Left Side	06	2437	18.01	18.5	1.119	0.134	0.150		
	802.11b	Bottom Side	06	2437	18.01	18.5	1.119	0.267	0.299		

Remark:1. Per KDB 447498 D01 v06, if the highest output channel SAR for each exposure position ≤ 0.8 W/kg other channels SAR tests are not necessary.

- 2. Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg;steps 3) through 5) do not apply.
- 3. When the original highest measured SAR is $\, \geq \, 0.80 \, \text{W/kg}$, repeat that measurement once.
- 4. Perform a second repeated measurement only 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 (~ 10% from the 1-g SAR limit).
- 5. Perform a third repeated measurement only if the original, first or second repeated measurement is \geq 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

Reference No.: WTX22X01001654W Page 26 of 37

9.3 Simultaneous Multi-band Transmission SAR Analysis

List of Mode for Simultaneous Multi-band Transmission

No.	Configurations	Body SAR
1	WLAN(2.4G)(Data)+ Bluetooth(Data)	Yes

Remark:

1. According to the KDB 447498 D01 v06, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR must be estimated according to following to determine simultaneous transmission SAR test exclusion:

(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[$\sqrt{f(GHz)/x}$] W/kg for test separation distances \leq 50 mm;

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

For simultaneous transmission analysis, Bluetooth SAR is estimated per KDB 447498 D01 v06 as below:

Bluetooth:

Tune-Up	Max. Power	Distance (mm)	Frequency	×	SAR(1g)	SAR(1g)
Power (dBm)	(mW)	Distance (IIIII)	(GHz)	^	5mm	10mm
0.5	1.12	5/10	2.48	7.5	0.047	0.024

Body SAR WLAN(2.4G) and Bluetooth

	WLAN(2.4G)	Bluetooth	Summed SAR
Position	Scaled SAR	Scaled SAR	(W/kg)
rosition	(W/kg)	(W/kg)	(W/Kg)
Back	0.124	0.047	0.171
Front	0.420	0.047	0.467
Right side		0.047	0.047
Left side	0.150	0.047	0.197
Bottom side	0.299	0.047	0.346
Top side		0.047	0.047

10. Measurement Uncertainty

10.1 Uncertainty for SAR Test

a	b	c	d	e= f(d,k)	f	g	h= c*f/e	i= c*g/e	k
Uncertainty Component	Sec.	Tol	Prob.	Div.	Ci (1g)	Ci (10g)	1g Ui	10g Ui	Vi
		(+- %)	Dist.				(+-%)	(+-%)	
Measurement System									
Probe calibration	E.2.1	7.0	N	1	1	1	7.00	7.00	×
Axial Isotropy	E.2.2	2.5	R	√3	(1_Cp)^1/2	(1_Cp)^1/2	1.02	1.02	œ
Hemispherical Isotropy	E.2.2	4.0	R	√3	(Cp)^1/2	(Cp)^1/2	1.63	1.63	8
Boundary effect	E.2.3	1.0	R	√3	1	1	0.58	0.58	8
Linearity	E.2.4	5.0	R	√3	1	1	2.89	2.89	8
System detection limits	E.2.5	1.0	R	√3	1	1	0.58	0.58	œ
Readout Electronics	E.2.6	0.02	N	1	1	1	0.02	0.02	œ
Reponse Time	E.2.7	3.0	R	√3	1	1	1.73	1.73	œ
Integration Time	E.2.8	2.0	R	√3	1	1	1.15	1.15	œ
RF ambient Conditions – Noise	E.6.1	0	R	√3	1	1	1.73	1.73	œ
RF ambient Conditions -	E.6.1	0	R	√3	1	1	1.73	1.73	œ
Reflections									
Probe positioner Mechanical	E.6.2	2.0	R	$\sqrt{3}$	1	1	1.15	1.15	œ
Tolerance				1					
Probe positioning with respect to	E.6.3	0.05	R	√3	1	1	0.03	0.03	∞
Phantom Shell				1-			• 00	• 00	
Extrapolation, interpolation and	E.5	5.0	R	$\sqrt{3}$	1	1	2.89	2.89	œ
integration Algoritms for Max.									
SAR Evaluation									
Test Sample Related		1	ı		1		T		
Test sample positioning	E.4.2	0.03	N	1	1	1	0.03	0.03	N-1
Device Holder Uncertainty	E.4.1	5.00	N	1	1	1	5.00	5.00	
Output power Variation - SAR	E.2.9	12.02	R	$\sqrt{3}$	1	1	6.94	6.94	œ
drift measurement									
SAR scaling	E6.5	0.0	R	√3	1	1	0.0	0.0	×
Phantom and Tissue Parameters									
Phantom Uncertainty (Shape and	E.3.1	0.05	R	√3	1	1	0.03	0.03	8
thickness tolerances)									

Reference No.: WTX22X01001654W Page 28 of 37

Uncertainty in SAR correction for	E3.2	1.9	R	√3	1	0.84	1.10	0.90	œ
deviations in permittivity and									
conductivity									
Liquid conductivity - deviation	E.3.2	5.00	R	√3	0.64	0.43	1.85	1.24	×
from target value									
Liquid conductivity -	E.3.3	5.00	N	1	0.64	0.43	3.20	2.15	×
measurement uncertainty									
Liquid permittivity - deviation	E.3.2	0.37	R	√3	0.6	0.49	0.13	0.10	×
from target value									
Liquid permittivity -	E.3.3	10.00	N	1	0.6	0.49	6.00	4.90	œ
measurement uncertainty									
Combined Standard Uncertainty			RSS				10.20	10.00	
Expanded Uncertainty			K=2				20.40	20.00	
(95% Confidence interval)									

Annex A. Plots of System Performance Check

MEASUREMENT 1

Type: Validation measurement (Fast, 75.00 %) Measurement duration: 12 minutes 21 seconds

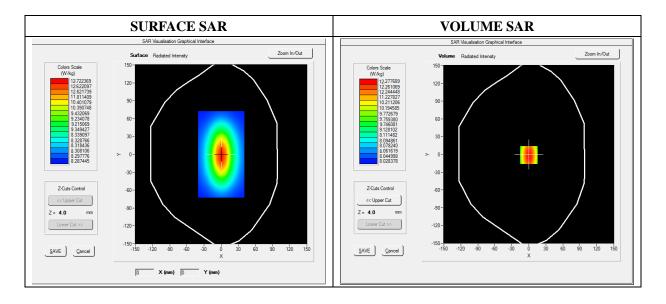
E-field Probe: SSE2 - SN 18/21 EPGO356; ConvF: 2.62; Calibrated: 2021-07-16

A. Experimental conditions

Area Scan	dx=8mm dy=8mm
Zoom Scan	dx=8mm dy=8mm dz=5mm
Phantom	Validation plane
Device Position	Dipole
Band	CW2450
Signal	Duty Cycle 1:1

B. SAR Measurement Results

Frequency (MHz)	2450.000000
Relative Permittivity (real part)	52.6102164
Conductivity (S/m)	1.930215
Power Variation (%)	1.369745
Ambient Temperature	21.1
Liquid Temperature	21.2

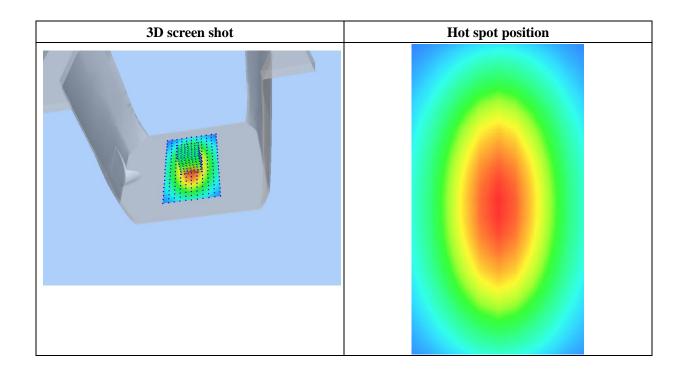


Maximum location: X=0.00, Y=0.00

SAR 10g (W/Kg)	6.119522
SAR 1g (W/Kg)	12.592360

Z Axis Scan

Z (mm)	0.00	4.00	9.00	14.00	19.00	24.00	29.00
SAR	0.0000	13.1911	11.7951	9.2945	8.5400	6.3712	4.6225
(W/Kg)							
	13.27	1					
	12.25						
	_ 7.60)- 	$\overline{}$				
	SAB (Wkg)	,	$ \setminus $				
	AB (
	4.50)-		+			
	2 01						
3.05-2.03-							
0.0 2.5 5.0 7.5 10.0 12.5 15.0 17.520.0 22.5 25.0 27.5 30.0 32.5 35.0 Z (mm)							
_ ,,							



Annex B. Plots of SAR Measurement

MEASUREMENT 1

Type: Phone measurement (Complete)
Date of measurement: 2022-01-10

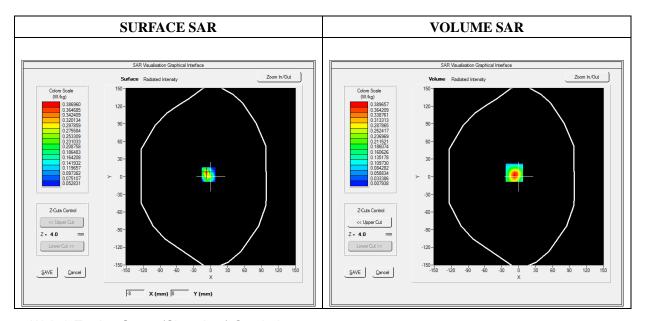
Measurement duration: 12 minutes 3 seconds

A. Experimental conditions

Area Scan	dx=8mm dy=8mm		
Zoom Scan	dx=8mm dy=8mm dz=5mm		
Phantom	Flat Plane		
Device Position	Front		
Band	WiFi_802.11b		
Channels	Middle		
Signal	Duty Cycle 1:1		

B. SAR Measurement Results

Frequency (MHz)	2437.000000
Relative Permittivity (real part)	52.610511
Conductivity (S/m)	1.932651
Power Variation (%)	2.403721
Ambient Temperature	21.1
Liquid Temperature	21.2

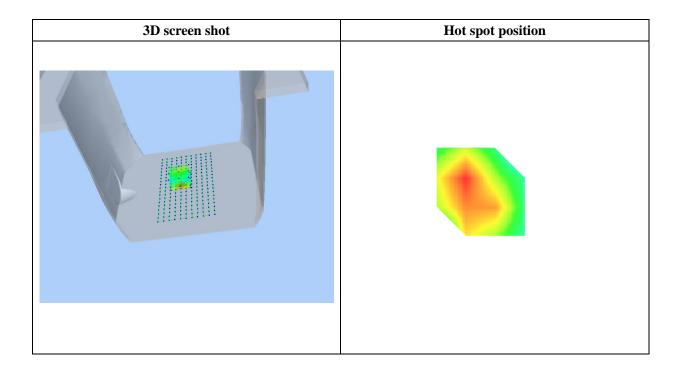


Maximum location: X=-8.00, Y=7.00

SAR Peak: 0.86 W/kg

SAR 10g (W/Kg)	0.187104
SAR 1g (W/Kg)	0.375174

0.3897	0.1429	0.0603	0.1093
		 -	
$\overline{}$			
		_	
9 10 12 14	16 19 20 22	24 26 29 20	
0 10 12 14		24 20 20 30	
		8 10 12 14 16 18 20 22 Z (mm)	



Annex C. EUT Photos

EUT View_1

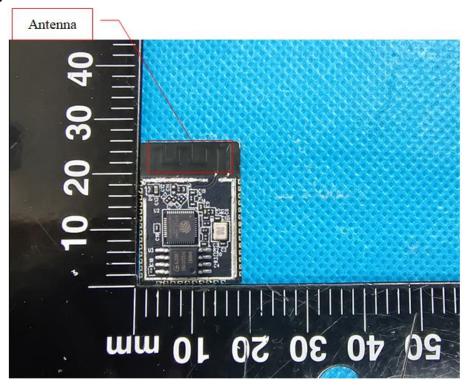


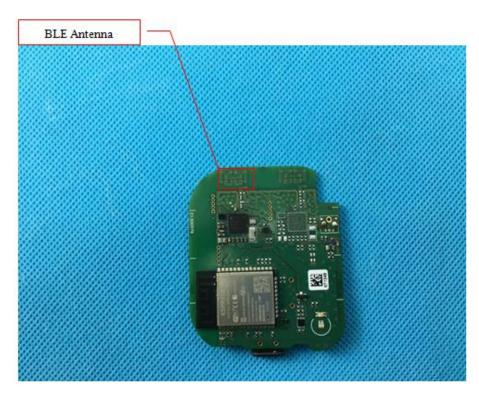
EUT View_2



Reference No.: WTX22X01001654W Page 34 of 37

Antenna View:





Reference No.: WTX22X01001654W	Page 37 of 37	
Annex E. Calibration Certificate		
Please refer to the exhibit for the calibration	on certificate	
***** END OF REPORT ****		