SAR EVALUATION REPORT

FCC 47 CFR § 2.1093
IEEE Std 1528-2013

For
MEDICAL BED "PROCUITY"

FCC ID: Z7A-SDMACP(WLAN)
QOQWT32I (BT)
Model Number: 3009

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NVLAP TESTING

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Revision History

Rev.	Date	Revisions	Revised By
--	4/30/2020	Initial Issue	--
1	5/09/2020	Updated BT separation distance. Updated EUT hardware and software versions	Richard Jankovics
2	5/15/2020	Updated calibration due date for probe SN: 3749	Richard Jankovics

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1. Attestation of Test Results

Applicant Name	Stryker Medical, a division of Stryker Corporation		
FCC ID	Z7A-SDMACP (WLAN) QOQWT32I (BT)		
Model Number	3009		
Applicable Standards	Published RF exposure KDB procedures IEEE Std 1528-2013		
Exposure Category	SAR Limits (W/Kg)		
	Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)	
General population / Uncontrolled exposure	1.6	4	
RF Exposure Conditions	Equipment Class - Highest Reported SAR (W/kg)		
	DTS	NII	DSS
Extremity	0.80	0.17	0.10
Simultaneous TX	0.90	0.27	0. 90
Date Tested	2/24/2020 to 3/25/2020		
Test Results	Pass		

UL LLC tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

This document may not be altered or revised in any way unless done so by UL LLC and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL LLC will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of the U.S. government.

Approved & Released By:	Prepared By:
Devin Chang Senior Test Engineer UL LLC	Richard Jankovics Operations Leader UL LLC

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528-2013, ANSI C63.10, the following FCC Published RF exposure KDB procedures:

- 248227 D01 802.11 Wi-Fi SAR v02r02
- 447498 D01 General RF Exposure Guidance v06
- 447498 D03 Supplement C Cross-Reference v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

In addition to the above, the following information was used:

- TCB workshop April 2019; RF Exposure Procedures (Tissue Simulating Liquids (TSL))
- TCB workshop October 2016; RF Exposure Procedures (Bluetooth Duty Factor)
- TCB workshop October 2016; RF Exposure Procedures (DUT Holder Perturbations)
- TCB workshop May 2017; RF Exposure Procedures (Broadband Liquid Above 3 GHz)

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at 2800 Perimeter Park Dr, Morrisville, NC, USA.

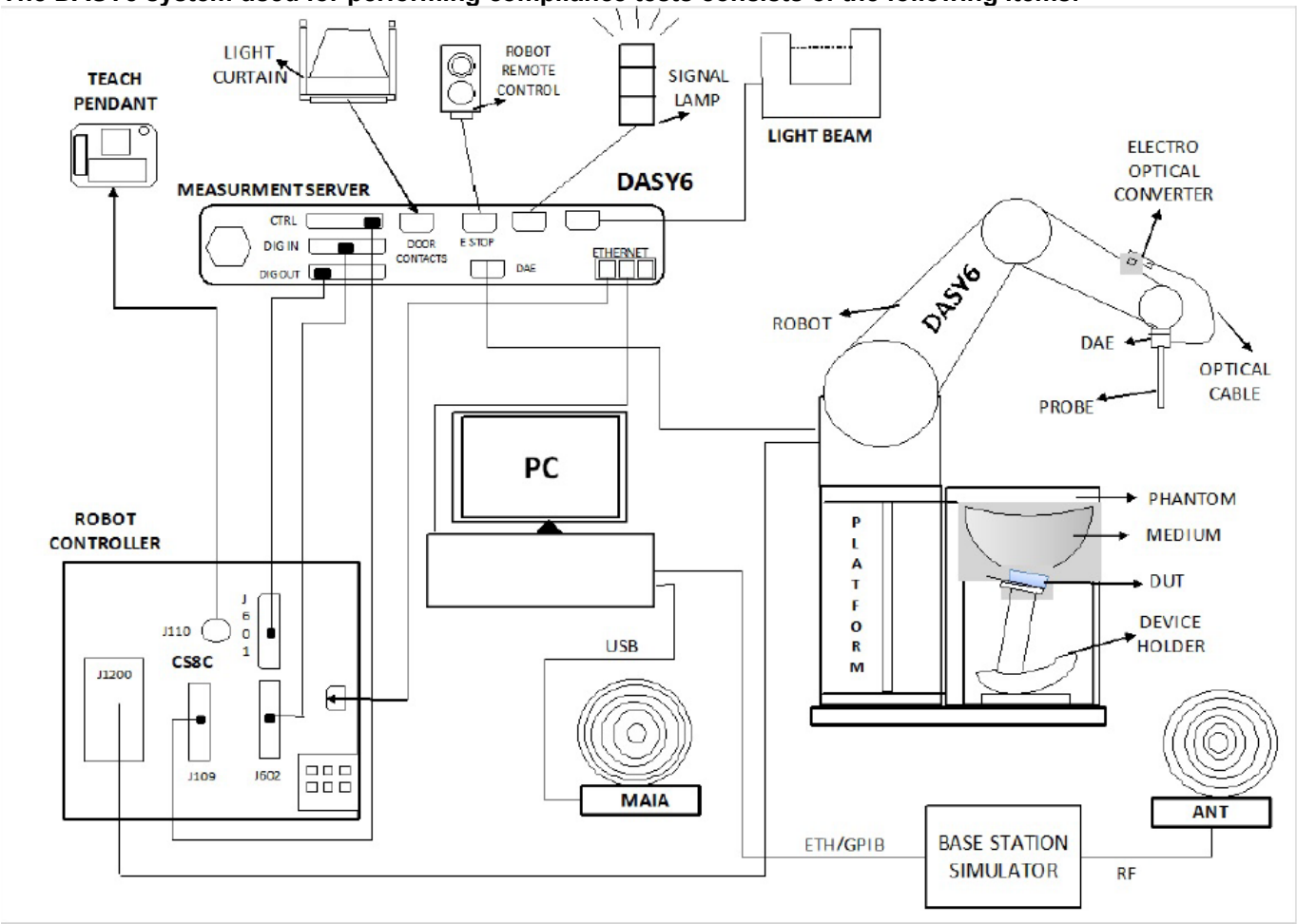
- SAR Lab 1A

UL LLC (RTP) is accredited by NVLAP, Laboratory Code 200246-0. The full scope of accreditation can be viewed at http://ts.nist.gov/standards/scopes/2002460.htm.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

4.2. SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. The minimum distance of probe sensors to surface is 2.1 mm. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

Step 2: Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly.

Area Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	½·δ·ln(2) ± 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}	≤ 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 ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

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

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

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

Step 4: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement within the same procedure, and with the same settings. The Power Drift Measurement gives the field difference in dB from the reading conducted within the last Power Reference Measurement. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

4.3. Test Equipment

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

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Reflectometer (VNA)	Copper Mountain Technologies	R140	190514	11/21/2020
Dielectric Probe	SPEAG	DAKS-3.5	1051	11/12/2020
Shorting block	SPEAG	DAK-1.2/3.5 Short	SM DAK 200 CA	NA
Thermometer	Fisher Scientific	Traceable	192539139	10/31/2020

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Signal Generator	Keysight	N5181A	MY50140788	10/22/2020
Power Meter	Keysight	N1912A	MY55136012	06/14/2020
Power Sensor	Keysight	N1921A	MY55090030	05/06/2020
Power Sensor	Keysight	N1921A	MY55090047	06/10/2020
Amplifier	Amplical	AMP0.4G-34-27	150507	N/A
Bi-directional coupler	Werlatone, Inc.	C8060-102	3266	N/A
DC Power Supply	GW	Dual Tracking Power Supply	B900219	N/A

Lab Equipment

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
E-Field Probe (SAR Lab 1A)	SPEAG	EX3DV4	7335	02/21/2021
E-Field Probe (SAR Lab 1A)	SPEAG	EX3DV4	3749	01/23/2021
Data Acquisition Electronics (SAR Lab 1A)	SPEAG	DAE4	1434	11/15/2020
System Validation Dipole	SPEAG	D2450V2	963	11/12/2020
System Validation Dipole	SPEAG	D5GHzV2	1213	11/19/2020
Environmental Monitor (SAR Lab 1A)	Fisher Scientific	Traceable	161024885	06/17/2020

5. 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 and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be ≤ 30%, for a confidence interval of k = 2. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.

6. Device Under Test (DUT) Information

6.1. DUT Description

Summary	The EUT is a medical patient bed. The Wi-Fi radio is contained with the footboard section of the bed, which was removed from the metal frame of the bed for testing. The Bluetooth radio is contained within a portion of the lower frame below the headboard. The separation distance and output power yielded exemption for this radio.
Device Dimension	Overall (Length x Width): 2298.7 mm x 1054.1 mm Wi-Fi enclosure (Length x Width x Height): 155 mm x 65 mm x 18 mm Footboard (Length x Width): 929.64 mm x 482.6 mm Bluetooth enclosure (Length x Width x Height): 500 mm x 422 mm x 224 mm
Hardware Version	WiFi: P/N 300900680910 REV AA containing Gateway PCBA 521206010900 Rev AB BT: P/N 300900380920 REV AF
Software Version	WiFi: GW_QDART_LINUX_V1, //depot/R&D/Projects/Gateway4.1/Tools/Wi-Fi/Certification/WiFiCertificationImage/ BT: Pace_BT_Cert_Test, //IMS-157-PACE_task_streams/200121_RIB_BluetoothTest/

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing
Wi-Fi	2.4 GHz	802.11b 802.11g 802.11n (HT20) 802.11n (HT40)	98.8% (802.11b)
	5 GHz	802.11a 802.11n (HT20) 802.11n (HT40) 802.11ac (VHT20) 802.11ac (VHT40) 802.11ac (VHT80)	94.5% (802.11nHT20)
	Does this device support bands 5.60 ~ 5.65 GHz? ☒ Yes ☐ No		
	Does this device support Band gap channel(s)? ☐ Yes ☒ No		
Bluetooth	2.4 GHz	BR, EDR, and LE	N/A[1]

Notes:

1. Measured Duty Cycle is not required due to SAR test exemption.

7. RF Exposure Conditions (Test Configurations)

Refer to Appendix A for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

7.1. Standalone SAR Test Exclusion Considerations

Since the *Dedicated Host Approach* is applied, the standalone SAR test exclusion procedure in KDB 447498 § 4.3.1 (RSS-102 Issue 5 § 2.5.1) is applied to determine the minimum test separation distance:

- When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.
- When the separation distance from the antenna to an adjacent edge is > 5 mm, the actual antenna-to-edge separation distance is applied to determine SAR test exclusion.

SAR Test Exclusion Calculations for WLAN

Antennas < 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value					
		dBm	mW	Rear	Edge 1	Edge 2	Edge 3	Edge 4	Front	Rear	Edge 1	Edge 2	Edge 3	Edge 4	Front
Wi-Fi Main Antenna															
Wi-Fi 2.4 GHz	2462	20.50	112	12	350	390	124	492	49	14.6 -MEASURE-	> 50 mm	> 50 mm	> 50 mm	> 50 mm	3.6 -MEASURE-
Wi-Fi 5.2 GHz	5240	13.50	22	12	350	390	124	492	49	4.2 -EXEMPT-	> 50 mm	> 50 mm	> 50 mm	> 50 mm	1 -EXEMPT-
Wi-Fi 5.3 GHz	5320	13.50	22	12	350	390	124	492	49	4.2 -EXEMPT-	> 50 mm	> 50 mm	> 50 mm	> 50 mm	1 -EXEMPT-
Wi-Fi 5.5 GHz	5700	13.50	22	12	350	390	124	492	49	4.4 -EXEMPT-	> 50 mm	> 50 mm	> 50 mm	> 50 mm	1.1 -EXEMPT-
Wi-Fi 5.8 GHz	5825	13.50	22	12	350	390	124	492	49	4.4 -EXEMPT-	> 50 mm	> 50 mm	> 50 mm	> 50 mm	1.1 -EXEMPT-
Bluetooth	2480	8.00	6	61					116	> 50 mm					> 50 mm

Note(s):

According to KDB 447498 (RSS-102 Issue 5 § 2.5.1), if the calculated threshold value is >3 then SAR testing is required, except for the rear surface which is subject to a threshold of 7.5 (extremity limit).

Antennas > 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value					
		dBm	mW	Rear	Edge 1	Edge 2	Edge 3	Edge 4	Front	Rear	Edge 1	Edge 2	Edge 3	Edge 4	Front
Wi-Fi Main Antenna															
Wi-Fi 2.4 GHz	2462	20.50	112	12	350	390	124	492	49	< 50 mm	3095.6 mW -EXEMPT-	3495.6 mW -EXEMPT-	835.6 mW -EXEMPT-	4515.6 mW -EXEMPT-	< 50 mm
Wi-Fi 5.2 GHz	5240	13.50	22	12	350	390	124	492	49	< 50 mm	3065.5 mW -EXEMPT-	3465.5 mW -EXEMPT-	805.5 mW -EXEMPT-	4485.5 mW -EXEMPT-	< 50 mm
Wi-Fi 5.3 GHz	5320	13.50	22	12	350	390	124	492	49	< 50 mm	3065 mW -EXEMPT-	3465 mW -EXEMPT-	805 mW -EXEMPT-	4485 mW -EXEMPT-	< 50 mm
Wi-Fi 5.5 GHz	5700	13.50	22	12	350	390	124	492	49	< 50 mm	3062.8 mW -EXEMPT-	3462.8 mW -EXEMPT-	802.8 mW -EXEMPT-	4482.8 mW -EXEMPT-	< 50 mm
Wi-Fi 5.8 GHz	5825	13.50	22	12	350	390	124	492	49	< 50 mm	3062.2 mW -EXEMPT-	3462.2 mW -EXEMPT-	802.2 mW -EXEMPT-	4482.2 mW -EXEMPT-	< 50 mm
Bluetooth	2480	8.00	6	61					116	205.3 mW -EXEMPT-					755.3 mW -EXEMPT-

Note(s):

According to KDB 447498 (RSS-102 Issue 5 § 2.5.1), if the calculated Power threshold is less than the output power then SAR testing is required.

7.2. Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 7.1:

Test Configurations	Rear	Edge 1 (Top Edge)	Edge 2 (Right Edge)	Edge 3 (Bottom Edge)	Edge 4 (Left Edge)	Front
Wi-Fi 2.4 GHz SISO (Main Antenna)	Yes	No	No	No	No	Yes
Wi-Fi 5 GHz SISO (Main Antenna)	No†	No	No	No	No	No
Bluetooth	No†	No	No	No	No	No

Note(s):

Yes = Testing is required.

No = Testing is not required.

† Exposure condition is extremity, therefore exclusion threshold is 7.5 per KDB 447498

8. Dielectric Property Measurements & System Check

8.1. Dielectric Property Measurements

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; for example, when the parameters are marginal at the beginning of the measurement series.
Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.
The dielectric constant (εr) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within ± 5% of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for εr and σ may be relaxed to ± 10%. This is limited to frequencies ≤ 3 GHz.

Tissue Dielectric Parameters
FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	ε_r	σ (S/m)	ε_r	σ (S/m)
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

IEEE Std 1528-2013
Refer to Table 3 within the IEEE Std 1528-2013

IEC 62209-1
Refer to Table A.3 within the IEC 62209-1

Dielectric Property Measurements Results:

SAR Lab	Date	Band (MHz)	Tissue Type	Frequency (MHz)	Relative Permittivity (εr)			Conductivity (σ)		
					Measured	Target	Delta (%)	Measured	Target	Delta (%)
1A	02/24/2020	2450	Head	2450	39.48	39.20	0.71	1.89	1.80	4.89
				2400	39.64	39.30	0.87	1.83	1.75	4.70
				2480	39.39	39.16	0.58	1.92	1.83	4.94
1A	03/23/2020	5250	Head	5250	34.70	35.93	-3.43	4.49	4.70	-4.49
				5150	34.95	36.05	-3.04	4.44	4.60	-3.45
				5350	34.59	35.82	-3.43	4.71	4.80	-2.01
1A	03/23/2020	5600	Head	5600	34.29	35.53	-3.50	4.86	5.06	-3.92
				5500	34.49	35.65	-3.25	4.84	4.96	-2.42
				5725	33.98	35.39	-3.99	5.07	5.19	-2.32
1A	03/23/2020	5750	Head	5750	33.97	35.36	-3.94	5.08	5.21	-2.53
				5700	34.04	35.42	-3.90	5.06	5.16	-2.04
				5850	33.95	35.30	-3.82	5.08	5.27	-3.61
1A	03/24/2020	2450	Head	2450	39.01	39.20	-0.48	1.88	1.80	4.33
				2400	39.20	39.30	-0.25	1.83	1.75	4.19
				2480	38.93	39.16	-0.59	1.91	1.83	4.34

8.2. System Check

SAR system verification is required to confirm measurement accuracy, according to the tissue dielectric media, probe calibration points and other system operating parameters required for measuring the SAR of a test device. The system verification must be performed for each frequency band and within the valid range of each probe calibration point required for testing the device. The same SAR probe(s) and tissue-equivalent media combinations used with each specific SAR system for system verification must be used for device testing. When multiple probe calibration points are required to cover substantially large transmission bands, independent system verifications are required for each probe calibration point. A system verification must be performed before each series of SAR measurements using the same probe calibration point and tissue-equivalent medium. Additional system verification should be considered according to the conditions of the tissue-equivalent medium and measured tissue dielectric parameters, typically every three to four days when the liquid parameters are re-measured or sooner when marginal liquid parameters are used at the beginning of a series of measurements.

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.
  For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- Distance between probe sensors and phantom surface was set to 3 mm.
  For 5 GHz band - Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was 100 mW.
- The results are normalized to 1 W input power.

System Check Results

The 1-g and 10-g SAR measured with a reference dipole, using the required tissue-equivalent medium at the test frequency, must be within ±10% of the manufacturer calibrated dipole SAR target. Refer to Appendix B for the SAR System Check Plots.

SAR Lab	Date	Tissue Type	Dipole Type _Serial #	Dipole Cal. Due Date	Measured Results for 1g SAR				Measured Results for 10g SAR				Plot No.
					Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	Zoom Scan to 100 mW	Normalize to 1 W	Target (Ref. Value)	Delta ±10 %	
1A	02/24/2020	Head	D2450V2 SN: 963	2020-11-12	5.630	56.30	52.70	6.83	2.590	25.90	24.50	5.71	1,2
1A	03/23/2020	Head	D5GHzV2 SN: 1213 (5.25 GHz)	2020-11-19	7.980	79.80	82.20	-2.92	2.320	23.20	23.20	0.00	3,4
1A	03/23/2020	Head	D5GHzV2 SN: 1213 (5.60 GHz)	2020-11-19	8.560	85.60	85.30	0.35	2.470	24.70	24.20	2.07	5,6
1A	03/23/2020	Head	D5GHzV2 SN: 1213 (5.75 GHz)	2020-11-19	7.840	78.40	81.30	-3.57	2.260	22.60	22.90	-1.31	7,8
1A	03/25/2020	Head	D2450V2 SN: 963	2020-11-12	5.360	53.60	52.70	1.71	2.480	24.80	24.50	1.22	9,10

9. Conducted Output Power Measurements

9.1. Wi-Fi 2.4GHz (DTS Band)

Maximum Output Power (Tune-up Limit) for Wi-Fi 2.4 GHz

The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures.

For “Not required”, SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) 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 802.11b/g/n mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band. Additional output power measurements were not deemed necessary.

SAR testing is not required for OFDM mode(s) 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.

Wi-Fi 2.4GHz Measured Results

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Chain 0 Average Power (dBm)		
					Meas Pwr	Tune-up	SAR Test (Yes/No)
DSSS 2.4 GHz	802.11b	1 Mbps	1	2412	19.52	20.50	Yes
			6	2437	19.82	20.50	
			11	2462	19.93	20.50	
OFDM 2.4 GHz	802.11g	6 Mbps	1	2412	17.33	19.00	No
			6	2437	17.58	19.00	
			11	2462	17.71	19.00	
	802.11n (HT20)	6.5 Mbps	1	2412	17.21	19.00	No
			6	2437	17.31	19.00	
			11	2462	17.44	19.00	
	802.11n (HT40)	13.5 Mbps	3	2422	16.68	19.00	No
			6	2437	16.97	19.00	
			9	2452	16.75	19.00	

9.2. Wi-Fi 5GHz (U-NII Bands)

Maximum Output Power (Tune-up Limit) for Wi-Fi 5 GHz

When the same transmission mode configurations have the same maximum output power on the same channel for the 802.11 a/g/n/ac modes, the channel in the lower order/sequence 802.11 transmission mode is selected.

The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures.

For “Not required”, SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) 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. Additional output power measurements were not deemed necessary.

When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is ≤ 1.2 W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.

Wi-Fi 5 GHz Measured Results

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Chain 0 Average Power (dBm)		
					Meas Pwr	Tune-up	SAR Test (Yes/No)
UNII-1 5.2 GHz	802.11a	6 Mbps	36	5180	9.85	12.50	No
			40	5200	10.09	12.50	
			44	5220	10.50	12.50	
			48	5240	10.01	12.50	
	802.11n (HT20)	6.5 Mbps	36	5180	12.12	13.50	Yes
			40	5200	12.31	13.50	
			44	5220	12.41	13.50	
			48	5240	12.29	13.50	
	802.11ac (VHT20)	6.5 Mbps	36	5180	12.02	13.50	No
			40	5200	12.44	13.50	
			44	5220	12.50	13.50	
			48	5240	12.14	13.50	
	802.11n (HT40)	13.5 Mbps	38	5190	9.27	12.50	No
			46	5230	9.53	12.50	
	802.11ac (VHT40)	13.5 Mbps	38	5190	10.31	12.50	No
			46	5230	10.27	12.50	
	802.11ac (VHT80)	29.3 Mbps	42	5210	8.13	11.50	No

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Chain 0 Average Power (dBm)		
					Meas Pwr	Tune-up	SAR Test (Yes/No)
UNII-2A 5.3 GHz	802.11a	6 Mbps	52	5260	9.94	12.50	No
			56	5280	10.43	12.50	
			60	5300	10.14	12.50	
			64	5320	9.82	12.50	
	802.11n (HT20)	6.5 Mbps	52	5260	12.03	13.50	Yes
			56	5280	12.41	13.50	
			60	5300	12.15	13.50	
			64	5320	12.02	13.50	
	802.11ac (VHT20)	6.5 Mbps	52	5260	11.93	13.50	No
			56	5280	12.21	13.50	
			60	5300	12.24	13.50	
			64	5320	11.91	13.50	
	802.11n (HT40)	13.5 Mbps	54	5270	9.22	12.50	No
			62	5310	9.29	12.50	
	802.11ac (VHT40)	13.5 Mbps	54	5270	9.77	12.50	No
			62	5310	10.40	12.50	
	802.11ac (VHT80)	29.3 Mbps	58	5290	8.16	11.50	No

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Chain 0 Average Power (dBm)		
					Meas Pwr	Tune-up	SAR Test (Yes/No)
UNII-2C 5.5 GHz	802.11a	6 Mbps	100	5500	9.87	12.50	No
			116	5580	10.48	12.50	
			124	5620	11.01	12.50	
			144	5720	11.07	12.50	
	802.11n (HT20)	6.5 Mbps	100	5500	12.10	13.50	Yes
			116	5580	13.13	13.50	
			124	5620	11.63	13.50	
			144	5720	11.69	13.50	
	802.11ac (VHT20)	6.5 Mbps	100	5500	12.45	13.50	No
			116	5580	11.80	13.50	
			124	5620	11.84	13.50	
			144	5720	11.54	13.50	
	802.11n (HT40)	13.5 Mbps	102	5510	9.09	12.50	No
			118	5590	10.88	12.50	
			126	5630	11.50	12.50	
			142	5710	10.70	12.50	
	802.11ac (VHT40)	13.5 Mbps	102	5510	9.89	12.50	No
			118	5590	10.81	12.50	
			126	5630	11.01	12.50	
			142	5710	10.40	12.50	
	802.11ac (VHT80)	29.3 Mbps	106	5530	8.93	11.50	No
			122	5610	8.40	11.50	
			138	5690	9.47	11.50	

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Chain 0 Average Power (dBm)		
					Meas Pwr	Tune-up	SAR Test (Yes/No)
UNII-3 5.8 GHz	802.11a	6 Mbps	149	5745	9.73	12.50	No
			157	5785	10.82	12.50	
			165	5825	10.38	12.50	
	802.11n (HT20)	6.5 Mbps	149	5745	12.05	13.50	Yes
			157	5785	11.78	13.50	
			165	5825	12.13	13.50	
	802.11ac (VHT20)	6.5 Mbps	149	5745	12.16	13.50	No
			157	5785	12.55	13.50	
			165	5825	12.33	13.50	
	802.11n (HT40)	13.5 Mbps	151	5755	11.26	12.50	No
			159	5795	10.50	12.50	
	802.11ac (VHT40)	13.5 Mbps	151	5755	11.44	12.50	No
			159	5795	11.41	12.50	
	802.11ac (VHT80)	29.3 Mbps	155	5775	10.85	11.50	No

10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

- Reported SAR(W/kg) for Wi-Fi and Bluetooth = Measured SAR * Tune-up scaling factor * Duty Cycle scaling factor
- Duty Cycle scaling factor = 1 / Duty cycle (%)

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 1-g or 10-g SAR for the mid-band or highest output power channel is:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- ≤ 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
- ≤ 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 SAR meas for 802.11:

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the *initial test position(s)* by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The *initial test position(s)* is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the *reported* SAR for the *initial test position* is:

- ≤ 0.4 W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- > 0.4 W/kg, SAR is repeated using the same wireless mode test configuration tested in the *initial test position* to measure the subsequent next closet/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the *reported* SAR is ≤ 0.8 W/kg or all required test positions are tested.
  - For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
  - When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the *initial test position* and subsequent test positions, when the *reported* SAR is > 0.8 W/kg, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the *reported* SAR is ≤ 1.2 W/kg or all required test channels are considered.
  - The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is ≤ 1.2 W/kg, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is ≤ 1.2 W/kg, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

To determine the *initial test position*, Area Scans were performed to determine the position with the *Maximum Value of SAR (measured)*. The position that produced the highest *Maximum Value of SAR* is considered the worst case position; thus used as the *initial test position*.

10.1. Wi-Fi (DTS Band)

RF Exposure Conditions	Mode	Antenna	Dist. (mm)	Test Position	Ch #.	Freq. (MHz)	Area Scan Max. SAR (W/kg)	Duty Cycle	Power (dBm)		10-g SAR (W/kg)		Plot No.
									Tune-up Limit	Meas.	Meas.	Scaled	
Extemity	802.11b	Chain 0	0	Rear	11	2462	2.2	98.8%	20.5	19.9	0.70	0.80	1

10.2. Wi-Fi (U-NII Band)

RF Exposure Conditions	Mode	Antenna	Dist. (mm)	Test Position	Ch #.	Freq. (MHz)	Area Scan Max. SAR (W/kg)	Duty Cycle	Power (dBm)		10-g SAR (W/kg)		Plot No.
									Tune-up Limit	Meas.	Meas.	Scaled	
Extremity	802.11nHT20	Chain 0	0	Rear	56	5280	0.7	94.5%	13.5	12.4	0.13	0.17	3
Extremity	802.11nHT20	Chain 0	0	Rear	116	5580	0.6	94.5%	13.5	13.1	0.11	0.12	4
Extremity	802.11nHT20	Chain 0	0	Rear	149	5745	0.6	94.5%	13.5	12.1	0.10	0.15	5

10.3. Standalone SAR Test Exclusion Considerations & Estimated SAR

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)]·[√f(GHz)] ≤ 3.0, for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

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

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

When the standalone SAR test exclusion is applied 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)]·[√$f_{(GHz)}$/x]* W/kg for test separation distances ≤ 50 mm;
  where x = 7.5 for 1-g SAR, and x = 18.75 for 10-g SAR.
- 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distances is > 50 mm.

RF Air interface	RF Exposure Conditions	Frequency (GHz)	Max. tune-up tolerance Power		Min. test separation distance (mm)	SAR test exclusion Result*	Estimated 10-g SAR (W/kg)
			(dBm)	(mW)			
Bluetooth	Body-worn	2.480	8.0	6	5	1.9	0.101

Conclusion:

*: The computed value is ≤ 7.5; therefore, this qualifies for Standalone SAR test exclusion.

11. SAR Measurement Variability

In accordance with published RF Exposure KDB 865664 D01 SAR measurement 100 MHz to 6 GHz. 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.

1) Repeated measurement is not required when the original highest measured SAR is < 0.8 or 2 W/kg (1-g or 10-g respectively); steps 2) through 4) do not apply.
2) When the original highest measured SAR is ≥ 0.8 or 2 W/kg (1-g or 10-g respectively), repeat that measurement once.
3) 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 or 3.6 W/kg (~ 10% from the 1-g or 10-g respective SAR limit).
4) Perform a third repeated measurement only if the original, first, or second repeated measurement is ≥ 1.5 or 3.75 W/kg (1-g or 10-g respectively) and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

Note(s):

Repeated measurement is not required since the original highest measured SAR is <0.8 W/kg (1-g) or 2 W/kg (10-g) .

12. Simultaneous Transmission Conditions

12.1. Simultaneous transmission SAR test exclusion considerations

KDB 447498 D01 General RF Exposure Guidance provides two procedures for determining simultaneous transmission SAR test exclusion: Sum of SAR and SAR to Peak Location Ratio (SPLSR)

Sum of SAR

To qualify for simultaneous transmission SAR test exclusion based upon Sum of SAR the sum of the reported standalone SARs for all simultaneously transmitting antennas shall be below the applicable standalone SAR limit. If the sum of the SARs is above the applicable limit then simultaneous transmission SAR test exclusion may still apply if the requirements of the SAR to Peak Location Ratio (SPLSR) evaluation are met.

SAR to Peak Location Ratio (SPLSR)

KDB 447498 D01 General RF Exposure Guidance explains how to calculate the SAR to Peak Location Ratio (SPLSR) between pairs of simultaneously transmitting antennas:

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

Where:

SAR_1 is the highest reported or estimated SAR for the first of a pair of simultaneous transmitting antennas, in a specific test operating mode and exposure condition

SAR_2 is the highest reported or estimated SAR for the second of a pair of simultaneous transmitting antennas, in the same test operating mode and exposure condition as the first

Ri is the separation distance between the pair of simultaneous transmitting antennas. When the SAR is measured, for both antennas in the pair, it is determined by the actual x, y and z coordinates in the 1-g SAR for each SAR peak location, based on the extrapolated and interpolated result in the zoom scan measurement, using the formula of $[(x_1-x_2)^2 + (y_1-y_2)^2 + (z_1-z_2)^2]$

In order for a pair of simultaneous transmitting antennas with the sum of 1-g SAR > 1.6 W/kg to qualify for exemption from Simultaneous Transmission SAR measurements, it has to satisfy the condition of:

$$(SAR_1 + SAR_2)^{1.5} / Ri \leq 0.04$$

When an individual antenna transmits at on two bands simultaneously, the sum of the highest *reported* SAR for the frequency bands should be used to determine SAR_1.or SAR_2. When SPLSR is necessary, the smallest distance between the peak SAR locations for the antenna pair with respect to the peaks from each antenna should be used.

The antennas in all antenna pairs that do not qualify for simultaneous transmission SAR test exclusion must be tested for SAR compliance, according to the enlarged zoom scan and volume scan post-processing procedures in KDB Publication 865664 D01

Simultaneous transmission SAR measurement

When simultaneous transmission SAR measurements are required in different frequency bands not covered by a single probe calibration point then separate tests for each frequency band are performed. The tests are performed using enlarged zoom scans which are processed, by means of superposition, using the DASY5 volume scan post-processing procedures to determine the 1-g SAR for the aggregate SAR distribution.

The spatial resolution used for all enlarged zoom scans is the same as used for the most stringent zoom scans. I.E. the scan parameters required for the highest frequency assessed are used for all enlarged zoom scans. The scans cover the complete area of the device to ensure all transmitting antennas and radiating structures are assessed.

DASY5 provides the ability to perform Multiband Evaluations according to the latest standards using the Volume Scan job as well as appropriate routines for the Post-processing.

In order to extract and process measurements within different frequency bands, the SEMCAD X Post-processor performs the combination and subsequent superposition of these measurement data via DASY5= Combined MultiBand Averaged SAR.

Combined Multi Band Averaged SAR allows - in addition to the data extraction - an evaluation of the 1 g, 10 g and/or arbitrary averaged mass SAR.
Power Scaling Factor is used to allow the volume scans to be scaled by a value other than "1", this is important when the results need to be scaled to different maximum power levels. The Power Scaling Factor is applied to each individual point of the scan. When power scaling is used in multi-band combinations the scaling factor is applied to each individual point of the first scan, the second factor is then applied to each individual point of the second scan and so on. The scans are then combined.

12.2. Estimated SAR for Simultaneous Transmission SAR Analysis

Considerations for SAR estimation

1. When standalone SAR test exclusion applies, standalone SAR must also be estimated to determine simultaneous transmission SAR test exclusion.
2. Dedicated Host Approach criteria for SAR test exclusion is likewise applied to SAR estimation, with certain distinctions between test exclusion and SAR estimation:
   - When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied for SAR estimation; this is the same between test exclusion and SAR estimation calculations.
   - When the separation distance from the antenna to an adjacent edge is > 5 mm but ≤ 50 mm, the actual antenna-to-edge separation distance is applied for SAR estimation.
   - When the minimum test separation distance is > 50 mm, the estimated SAR value is 0.4 W/kg
3. Please refer to Estimated SAR Tables to see which test positions are inherently compliant as they consist of only estimated SAR values for all applicable transmitters and consequently will always have sum of SAR values < 1.2 W/kg. Simultaneous transmission SAR analysis was therefore not performed for these test positions.

12.3. Sum of the SAR for Wi-Fi & BT

RF Exposure conditions	Test Position	Standalone SAR (W/kg)			∑ 1-g SAR (W/kg)	
		1	2	3	1+3	2+3
		Wi-Fi 2.4G	Wi-Fi 5G	BT		
Standalone	Front	0.803	0.170	0.101	0.904	0.271

Appendixes

Refer to separated files for the following appendixes.

Appendix A: SAR Setup Photos

Appendix B: SAR System Check Plots

Appendix C: SAR Highest Test Plots

Appendix D: SAR Tissue Ingredients

Appendix E: SAR Probe Certificates

Appendix F: SAR Dipole Certificates

END OF REPORT