TEST REPORT

APPLICANT	:	Shenzhen Xhorse Electronics Co., Ltd.
PRODUCT NAME	:	KEY TOOL MAX PRO
MODEL NAME	:	XDKMP0
BRAND NAME	:	Xhorse
FCC ID	:	2AI4T-XDKMP0
STANDARD(S)	:	FCC 47 CFR Part 2(2.1093) IEEE 1528-2013
RECEIPT DATE	:	2022-07-25
TEST DATE	:	2022-09-02
ISSUE DATE	:	2022-09-26

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Change History		
Version	**Date**	**Reason for change**
1.0	2022-09-26	First edition

1. SAR Results Summary

The maximum results of Specific Absorption Rate (SAR) found during test as bellows:

Frequency Band	Highest SAR Summary
	Body (Separation 0mm)
315MHz	0.006

Highest Simultaneous Transmission SAR1g (W/Kg):	0.672 W/kg	Limit(W/kg):1.6W/kg

Note:

1. This device is in compliance with Specific Absorption Rate (SAR) for general population or uncontrolled exposure limits (1.6W/kg as averaged over any 1 gram of tissue; specified in FCC 47 CFR Part 1 (1.1310) and ANSI/IEEE C95.1-1992), and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013 and FCC KDB publications.
2. When the test result is a critical value, we will use the measurement uncertainty give the judgment result based on the 95% confidence intervals.

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2. Technical Information

Note: Provide by applicant.

2.1 Applicant and Manufacturer Information

Applicant:	Shenzhen Xhorse Electronics Co., Ltd.
Applicant Address:	Floor 28, Block A, Building NO.6, international innovation Valley, Nanshan District, Shenzhen, China
Manufacturer:	Shenzhen Xhorse Electronics Co., Ltd.
Manufacturer Address:	Floor 28, Block A, Building NO.6, international innovation Valley, Nanshan District, Shenzhen, China

2.2 Equipment under Test (EUT) Description

Product Name:	KEY TOOL MAX PRO
EUT NO.:	1#
Hardware Version:	V2.9
Software Version:	V1.1.2
Frequency Bands:	WLAN 2.4GHz: 2412 MHz ~ 2462 MHz Bluetooth: 2402 MHz ~ 2480 MHz NFC: 13.56MHz 125KHz 315MHz 434MHz(RX)
Modulation Mode:	802.11b: DSSS 802.11g/n-HT20: OFDM BR+EDR: GFSK(1Mbps), π/4-DQPSK(2Mbps), 8-DPSK(3Mbps) Bluetooth LE: GFSK NFC: ASK 125KHz: AM 315MHz: ASK 434MHz: ASK
Operation Class:	Class B
Hotspot Mode:	Support
Antenna Type:	WLAN: PCB Antenna Bluetooth: PCB Antenna NFC: Loop Antenna 125KHz: PCB Antenna

	315MHz: Loop Antenna 434MHz: Loop Antenna

Note:

1. Only 315 MHZ SAR measurements are recorded in this report.
2. For more detailed description, please refer to specification or user manual supplied by the applicant and/or manufacturer.

2.3 Environment of Test Site/Conditions

Normal Temperature (°C):	20-25
Relative Humidity (%):	30-75
Air Pressure (hPa):	980-1020

Test Frequency:	315MHz
Operation Mode:	Call established
Power Level:	315MHz

During SAR test, EUT is in Traffic Mode (Channel Allocated) at Normal Voltage Condition. A communication link is set up with a System Simulator (SS) by air link, and a call is established.

The EUT shall use its internal transmitter. The antenna(s), battery and accessories shall be those specified by the Factory. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power output. If a wireless link is used, the antenna connected to the output of the base station simulator shall be placed at least 50 cm away from the handset.
The signal transmitted by the simulator to the antenna feeding point shall be lower than the output power level of the handset by at least 35 dB.

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 techniques 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 Middle 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:

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

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, δT is the temperature rise and δt is the exposure duration, or related to the electrical field in the tissue by

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

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.

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4. RF Exposure Limits

4.1 Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

4.2 Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

4.3 RF Exposure Limits

SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT *General Population* (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT *Occupational* (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20

Note:

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

4.4 Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Method Determination /Remark
FCC 47CFR Part 2(2.1093)	Radio Frequency Radiation Exposure Evaluation: Portable Devices	No deviation
IEEE 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques	No deviation
KDB 447498 D01v06	General RF Exposure Guidance	No deviation
KDB 248227 D01v02r02	SAR Measurement Procedures for 802.11 Transmitters	No deviation
KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz	No deviation
KDB 865664 D02v01r02	RF Exposure Reporting	No deviation
KDB 941225 D06v02r01	SAR Evaluation Procedures For Portable Devices With Wireless Router Capabilities	No deviation
Note 1: The test item is not applicable. **Note 2:** Additions to, deviation, or exclusions from the method shall be judged in the "method determination" column of add, deviate or exclude from the specific method shall be explained in the "Remark" of the above table.		

5. SAR 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.

5.1 E-Field Probe

For the measurements the Specific Dosimetric E-Field Probe SN 37/08 EP80 with following specifications is used.

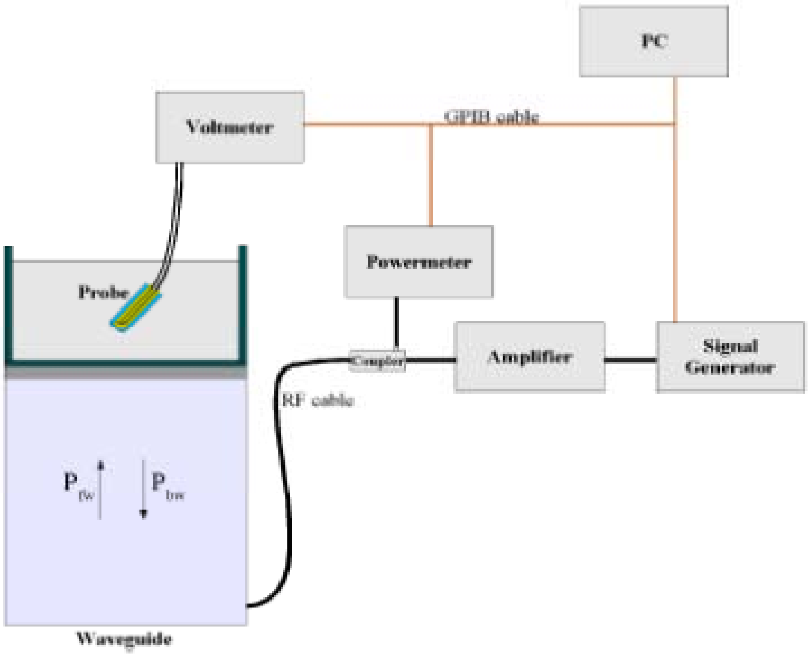
- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 6.5 mm
- Distance between probe tip and sensor center: 2.5mm
- Distance between sensor center and the inner phantom surface: 4 mm

(repeatability better than +/- 1mm)

- Probe linearity: <0.25 dB
- Axial Isotropy: <0.25 dB
- Spherical Isotropy: <0.25 dB
- Calibration range: 835 to 2500MHz for head & body simulating liquid.

Angle between probe axis (evaluation axis) and surface normal line: less than 30°

Probe calibration is realized, in compliance with CENELEC EN 62209 and IEEE 1528 std, with CALISAR, Antennessa proprietary calibration system. The calibration is performed with the EN 622091 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

ı = Skin depth

Keithley configuration:

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.

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 1 mW/cm².

Temperature Assessment Procedure

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulating 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.

Where:

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

δt = exposure time (30 seconds),

C = heat capacity of tissue (brain or muscle),

δT = temperature increase due to RF exposure.

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SAR is proportional to ΔT/Δt, the initial rate of tissue heating, before thermal diffusion takes place. The electric field in the simulated tissue can be used to estimate SAR by equating the thermally derived SAR to that with the E- field component.

Where:

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

σ = simulated tissue conductivity,

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

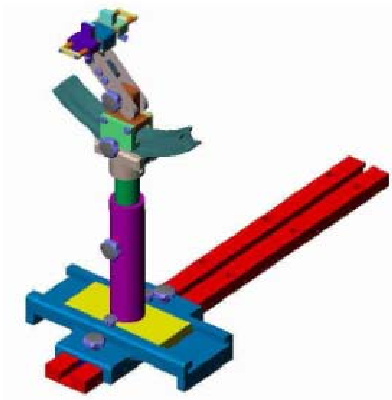
ρ = Tissue density (1.25 g/cm³ for brain tissue)

5.2 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.

5.3 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°.



Device holder

System Material	Permittivity	Loss Tangent
Delrin	3.7	0.005

5.4 Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial No./ SW Version	Calibration	
				Last Cal.	Due Date
SATIMO	300MHz System Validation Kit	300	36/08 DIPB98	2022.05.07	2023.05.07
SATIMO	Dosimetric E-Field Probe	N/A	37/08 EP80	2022.05.07	2023.05.07
SATIMO	SAM Twin Phantom 2	N/A	SN_36_08_SAM62	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Agilent	Network Analyzer	E5071B	MY42404762	2022.03.01	2023.02.28
SPEAG	Dielectric Assessment KIT	DAK-3.5	1279	2021.10.18	2022.10.17
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2022.01.07	2023.01.06
Agilent	Power Senor	N8482A	MY41091706	2021.10.21	2022.10.20
Agilent	Power Meter	E4416A	MY45102093	2021.10.21	2022.10.20
Anritsu	Power Sensor	MA2411B	N/A	2021.10.21	2022.10.20
R&S	Power Meter	NRVD	101066	2021.10.21	2022.10.20
Agilent	Dual Directional Coupler	778D	50422	NA	NA
MCL	Attenuation	351-218-010	N/A	NA	NA
R&S	Spectrum Analyzer	N9030A	MY54170556	2021.10.20	2022.10.19
KTJ	Thermo Meter	TA298	N/A	2021.12.21	2022.12.20
N/A	Tissue Simulating Liquids	Body 800-2600 MHz		Within 24H	

6. Tissue Simulating Liquids

For the measurement of the field distribution inside the phantom, 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, which is shown in Fig. 6.1, for body SAR testing, the liquid height from the centre of the flat phantom to liquid top surface is larger than 15 cm, which is shown in Fig. 6.2.

Fig 6.1 Photo of Liquid Height for Head SAR

Fig 6.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquids

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (εr)
Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
2600	54.8	0	0	0.1	0	45.1	1.96	39.0
Body								
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3
2450	68.6	0	0	0	0	31.4	1.95	52.7
2600	68.1	0	0	0.1	0	31.8	2.16	52.5

Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral Oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

Recipes for Tissue Simulating Liquid

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

The following table shows the measuring results for simulating liquid.

Frequency (MHz)	Real part of the complex relative permittivity, ε′r	Conductivity, σ (S/m)
30	55.0	0.75
150	52.3	0.76
300	45.3	0.87
450	43.5	0.87
835	41.5	0.90
900	41.5	0.97
1450	40.5	1.20
1800	40.0	1.40
1900	40.0	1.40
1950	40.0	1.40
2000	40.0	1.40
2100	39.8	1.49
2450	39.2	1.80
2600	39.0	1.96
3000	38.5	2.40
4000	37.4	3.43
5000	36.2	4.45
5200	36.0	4.65
5400	35.8	4.86
5600	35.5	5.06
5800	35.4	5.27
6000	35.1	5.48

The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using an Agilent 85033E Dielectric Probe Kit and an Agilent Network Analyzer.

The following table shows the measuring results for simulating liquid.

Frequency (MHz)	**Tissue Type**	**Liquid Temp. (℃)**	**Conductivity (σ)**	**Conductivity Target (σ)**	**Delta (σ) (%)**	**Limit (%)**	**Date**
300	HSL	21.8	0.904	0.87	3.87	±5	2022.09.02

Frequency (MHz)	**Tissue Type**	**Liquid Temp. (℃)**	**Permittivity (ε_r)**	**Permittivity Target (ε_r)**	**Delta (ε_r) (%)**	**Limit (%)**	**Date**
300	HSL	21.8	45.097	45.30	-0.45	±5	2022.09.02

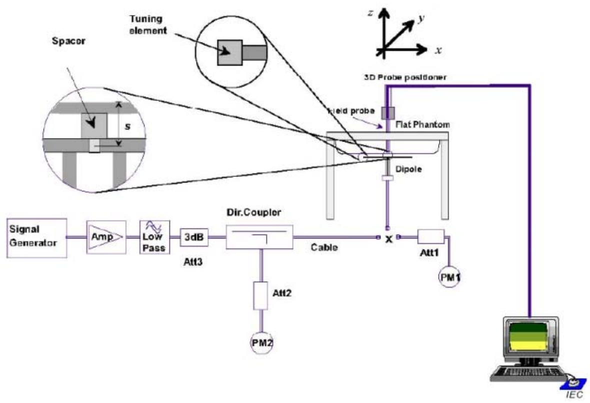
7. SAR System Verification

- **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.

- **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 that comes from a signal generator. 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. The equipment setup is shown below:



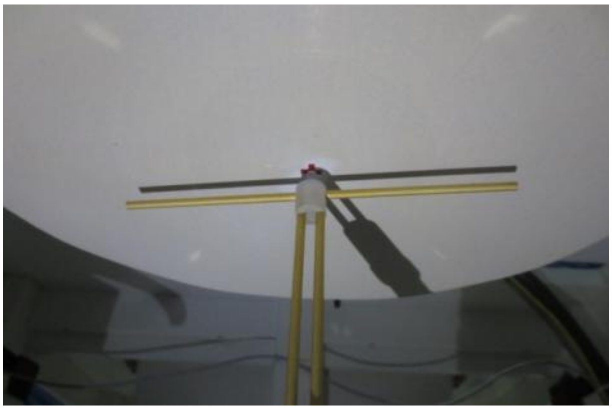


Fig.7.1 Photo of Dipole setup

- **System Verification Results**

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

<Validation Setup>

Frequency (MHz)	Tissue Type	Input Power(mW)	Dipole S/N	Probe S/N
300	HSL	100	36/08 DIPB98	37/08 EP80

<1g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2022.09.02	300	HSL	100	0.28	2.85	2.85	-0.08

<10g SAR>

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2022.09.02	300	HSL	100	0.21	1.94	2.08	7.02

Note: System checks the specific test data please see Annex C

8. EUT Testing Position

This EUT was tested in ten different positions. They are right cheek/right tilted/left cheek/left tilted for head, Front/Back/Right Side/Top Side/Bottom Side of the EUT with phantom 10 mm gap, as illustrated below, please refer to Appendix B for the test setup photos.

8.1 SAR Evaluations near the Mouth/Jaw Regions of the SAM Phantom

Antennas located near the bottom of a phone may require SAR measurements around the mouth and jaw regions of the SAM head phantom. This typically applies to clam-shell style phones that are generally longer in the unfolded normal use positions or to certain older style long rectangular phones.
Under these circumstances, the following procedures apply, adopted from the FCC guidance on SAR handsets document FCC KDB Publication 648474 D04v01r03. The SAR required in these regions of SAM should be measured using a flat phantom. The phone should be positioned with a separation distance of 4 mm between the ear reference point (ERP) and the outer surface of the flat phantom shell. While maintaining this distance at the ERP location, the low (bottom) edge of the phone should be lowered from the phantom to establish the same separation distance between the peak SAR locations identified by the truncated partial SAR distribution measured with the SAM phantom. The distance from the peak SAR location to the phone is determined by the straight line passing perpendicularly through the phantom surface. When it is not feasible to maintain 4 mm separation at the ERP while also establishing the required separation at the peak SAR location, the top edge of the phone will be allowed to touch the phantom with a separation < 4 mm at the ERP. The phone should not be tilted to the left or right while placed in this inclined position to the flat phantom.

8.2 Body Worn Accessory Configurations

- To position the device parallel to the phantom surface with either keypad up or down.
- To adjust the device parallel to the flat phantom.
- To adjust the distance between the device surface and the flat phantom to 10 mm or holster surface and the flat phantom to 0 mm.

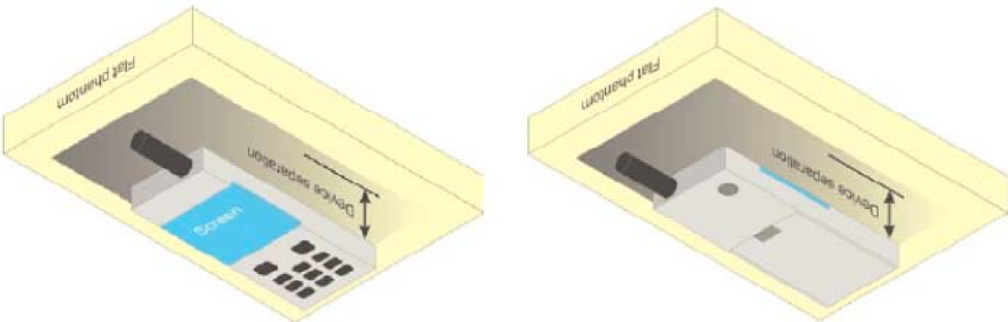


Fig.8.5 Illustration for Body Worn Position

8.3 Hotspot Mode Exposure Position Conditions

For handsets that support hotspot mode operations, with wireless router capabilities and various web browsing functions, the relevant hand and body exposure conditions are tested according to the hotspot SAR procedures in KDB 941225. A test separation distance of 10 mm is required between the phantom and all surfaces and edges with a transmitting antenna located within 25 mm from that surface or edge. When the form factor of a handset is smaller than 9 cm x 5 cm, a test separation distance of 5 mm (instead of 10 mm) is required for testing hotspot mode. When the separation distance required for body-worn accessory testing is larger than or equal to that tested for hotspot mode, in the same wireless mode and for the same surface of the phone, the hotspot mode SAR data may be used to support body-worn accessory SAR compliance for that particular configuration (surface).

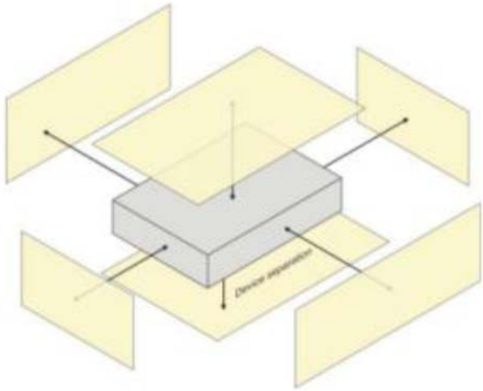


Fig 8.6 Illustration for Hotspot Position

9. Measurement Procedures

The measurement procedures are as bellows:

<Conducted power measurement>

- For WWAN power measurement, use base station simulator to configure EUT WWAN transition in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- Read the WWAN RF power level from the base station simulator.
- For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band.
- Connect EUT RF port through RF cable to the power meter or spectrum analyzer, and measure WLAN/BT output power.

<Conducted power measurement>

- Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- Place the EUT in positions as Appendix B demonstrates.
- Measure SAR results for the highest power channel on each testing position.
- Find out the largest SAR result on these testing positions of each band.
- Measure SAR results for other channels in worst SAR testing position if the Reported SAR or 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:

- Power reference measurement
- Area scan
- Zoom scan

9.1 Power Reference Measurement

The Power Reference Measurement and Power Drift Measurement 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. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

9.2 Area Scan Procedures

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a10mm^2 step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.
When an Area Scan has measured all reachable points, it computes the field maxima 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 IEEE1528-2003, EN 50361 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan).

9.3 Zoom Scan Procedures

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. A density of 1000 kg/m^3 is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 10mm, with the side length of the 10 g cube 21,5mm.The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5x5x7 (8mmx8mmx5mm)providing a volume of 32mm in the X & Y axis, and 30mm in the Z axis.

9.4 SAR Averaged Methods

In SATIMO, the interpolation and extrapolation are both based on the modified Quadratic Sheppard's method. The interpolation scheme combines a least-square fitted function method and a weighted average method which are the two basic types of computational interpolation and approximation.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1g and 10g cubes, the extrapolation distance should not be larger than 5 mm.

10. SAR Test Procedure

10.1 General Scan Requirements

Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.

<table>
<tr><th colspan="3"></th><th>≤ 3 GHz</th><th>> 3 GHz</th></tr>
<tr><td colspan="3">Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface</td><td>5 mm ± 1 mm</td><td>$\frac{1}{2}\cdot\delta\cdot\ln(2)$ mm ± 0.5 mm</td></tr>
<tr><td colspan="3">Maximum probe angle from probe axis to phantom surface normal at the measurement location</td><td>30° ± 1°</td><td>20° ± 1°</td></tr>
<tr><td colspan="3" rowspan="2">Maximum area scan spatial resolution: Δx_{Area}, Δy_{Area}</td><td>≤ 2 GHz: ≤ 15 mm
2 – 3 GHz: ≤ 12 mm</td><td>3 – 4 GHz: ≤ 12 mm
4 – 6 GHz: ≤ 10 mm</td></tr>
<tr><td colspan="2">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.</td></tr>
<tr><td colspan="3">Maximum zoom scan spatial resolution: Δx_{Zoom}, Δy_{Zoom}</td><td>≤ 2 GHz: ≤ 8 mm
2 – 3 GHz: ≤ 5 mm*</td><td>3 – 4 GHz: ≤ 5 mm*
4 – 6 GHz: ≤ 4 mm*</td></tr>
<tr><td rowspan="3">Maximum zoom scan spatial resolution, normal to phantom surface</td><td colspan="2">uniform grid: $\Delta z_{Zoom}(n)$</td><td>≤ 5 mm</td><td>3 – 4 GHz: ≤ 4 mm
4 – 5 GHz: ≤ 3 mm
5 – 6 GHz: ≤ 2 mm</td></tr>
<tr><td rowspan="2">graded grid</td><td>$\Delta z_{Zoom}(1)$: between 1st two points closest to phantom surface</td><td>≤ 4 mm</td><td>3 – 4 GHz: ≤ 3 mm
4 – 5 GHz: ≤ 2.5 mm
5 – 6 GHz: ≤ 2 mm</td></tr>
<tr><td>$\Delta z_{Zoom}(n>1)$: between subsequent points</td><td colspan="2">$\leq 1.5\cdot\Delta z_{Zoom}(n-1)$ mm</td></tr>
<tr><td>Minimum zoom scan volume</td><td colspan="2">x, y, z</td><td>≥ 30 mm</td><td>3 – 4 GHz: ≥ 28 mm
4 – 5 GHz: ≥ 25 mm
5 – 6 GHz: ≥ 22 mm</td></tr>
<tr><td colspan="5">Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.
* When zoom scan is required and the <u>reported</u> 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.</td></tr>
</table>

10.2 Test Procedure

The Following steps are used for each test position

1. Establish a call with the maximum output power with a base station simulator. The connection between the mobile and the base station simulator is established via air interface.
2. Measurement of the local E-field value at a fixed location. This value serves as a reference value for calculating a possible power drift.
3. Measurement of the SAR distribution with a grid of 8 to 16mm * 8 to16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme.
4. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8*4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

10.3 Description of Interpolation/Extrapolation Scheme

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 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

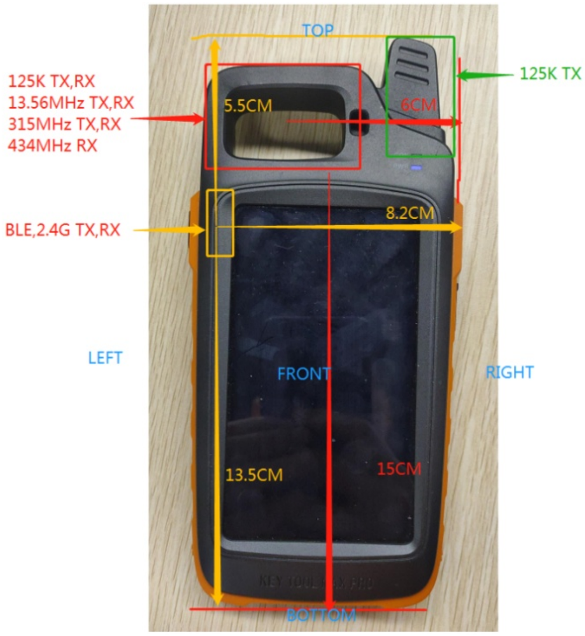
10.4 Wireless Router

Some battery-operated handsets have the capability to transmit and receive user through simultaneous transmission of WIFI simultaneously with a separate licensed transmitter. The FCC has provided guidance in FCC KDB Publication 941225 D06 v02r01 where SAR test considerations for handsets (L x W ≥ 9 cm x 5 cm) are based on a composite test separation distance of 10 from the front, back and edges of the device containing transmitting antennas within 2.5cm of their edges, determined form general mixed use conditions for this type of devices. Since the hotspot SAR results may overlap with the body-worn accessory SAR requirements, the more conservative configurations can be considered, thus excluding some body-worn accessory SAR tests.

When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of both the WIFI transmitter and another licensed transmitter. Both transmitters often do not transmit at the same transmitting frequency and thus cannot be evaluated for SAR under actual use conditions due to the limitations of the SAR assessment probes. Therefore, SAR must be evaluated for each frequency transmission and mode separately and spatially summed with the WIFI transmitter according to FCC KDB Publication 447498 D01v06 publication procedures. The “Portable Hotspot” feature on the handset was NOT activated during SAR assessments, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal at a time.

11. Hotspot Mode Evaluation Procedure

➢ EUT Antenna Location

	BLE/2.4Gwifi Antenna: TX/RX WLAN 2.4GHz/ Bluetooth NFC: TX/RX 125KHz: TX/RX 315MHz: TX/RX 434MHz:RX

➢ EUT Antenna Distance

Antenna Location	Front	Back	Left	Right	Top	Bottom
BLE/2.4Gwifi Antenna	＜5mm	＜5mm	＜5mm	＞25mm	＞25mm	＞25mm
315MHz	＜5mm	＜5mm	＜5mm	＞25mm	＜5mm	＞25mm

➢ Hotspot Evaluation

Assessment	Hotspot side for SAR Test distance: 0mm					
Antennas	Front	Back	Left	Right	Top	Bottom
BLE/2.4Gwifi Antenna	Yes	Yes	Yes	No	No	No
315MHz	Yes	Yes	Yes	No	Yes	No

Note:

1. The SAR evaluation procedures for Portable Devices with Wireless Router function is according to KDB 941225 D06 Hotspot SAR v02r01.
2. Head/Body-worn/Hotspot mode SAR assessments are required.
3. Referring to KDB 941225 D06, when the overall device length and width are ≤ 9cm*5cm, the test distance is 0 mm for the smaller SAR. SAR must be measured for all sides and surfaces with a transmitting antenna located within 25mm from that surface or edge.

12. SAR Test Results Summary

12.1 Standalone Body SAR

➢ **315 MHz Body SAR**

Plot No.	Band/Mode	Test Position	Freq. (MHz)	Measured SAR_{1g} (W/kg)	Reported SAR_{1g} (W/kg)
	315MHz	Front Side	315	0.003	0.003
	315MHz	Back Side	315	0.002	0.002
	315MHz	Left Side	315	0.004	0.004
1#	315MHz	Top Side	315	0.006	0.006

13. Simultaneous Transmission Evaluation

13.1 Simultaneous Transmission Consideration

No.	Simultaneous Transmission Consideration	Body
1	WLAN 2.4GHz/Bluetooth+NFC	Yes
2	WLAN 2.4GHz/Bluetooth+315MHz	Yes
3	WLAN 2.4GHz/Bluetooth+125 kHz	Yes

Note:

1. When the user enables the personal wireless router functions for the handset, actual operations include simultaneous transmission of the WWAN and WLAN transmitters. The "Portable Hotspot" feature on the handset was NOT activated, to ensure the SAR measurements were evaluated for a single transmission frequency RF signal.
2. The hotspot SAR result may overlap with the body-worn accessory SAR requirements, per KDB 941225 D06, the more conservative configurations can be considered, thus excluding some unnecessary body-worn accessory SAR tests.
3. Simultaneous Transmission SAR evaluation is not required for BT and WLAN, because the software mechanism have been incorporated to guarantee that the WLAN and Bluetooth transmitters would not simultaneously operate.
   Per KDB 447498D01v06, simultaneous transmission SAR evaluation procedures is as followed:
   Step 1: If sum of 1 g SAR < 1.6 W/kg, Simultaneous SAR measurement is not required.
   Step 2: If sum of 1 g SAR > 1.6 W/kg, ratio of SAR to peak separation distance for pair of transmitters calculated.
   Step 3: If the ratio of SAR to peak separation distance is ≤ 0.04, Simultaneous SAR measurement is not required.
   Step 4: If the ratio of SAR to peak separation distance is > 0.04, Simultaneous SAR measurement is required and simultaneous transmission SAR value is calculated.
   (The ratio is determined by: (SAR1 + SAR2) ^ 1.5/Ri ≤ 0.04,
   Ri is the separation distance between the peak SAR locations for the antenna pair in mm.
4. The test results of WLAN 2.4GHz/Bluetooth SAR were referred to the SAR report SZ22070187S01.

➢ **Total Exposure Radio Analysis**

The fields generated by the antennas can be correlated or uncorrelated. At different frequencies, fields are always uncorrelated, and the aggregate exposure contributions can be summed according to spatially averaged values of corresponding sources at any point in space, r, to determine the total exposure ratio (TER).

➢ **Simultaneous Transmission Analysis**

The worst case of the E-Field/H-Field + Bluetooth mode will be calculated for transmitting simultaneously.

$$\mathrm{TER} = \sum_{\mathrm{i=1}}^{\mathrm{400kHz}} \frac{\mathrm{Ei/Hi}}{\mathrm{MPEi}} + \sum_{\mathrm{i=1}}^{\mathrm{6GHz}} \frac{\mathrm{SAR}}{\mathrm{SARlimit}} < 1$$

13.2 Simultaneous Transmission Analysis

➢ **Body Simultaneous Transmission for WLAN 2.4GHz/Bluetooth+315MHz**

Band	Exposure Position	1	2	3	1+2 Summed 1g SAR (W/kg)	1+3 Summed 1g SAR (W/kg)
		315MHz	2.4GHz WLAN	Bluetooth		
		1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)		
N/A	Front Side	0.003	0.536	0.027	0.539	0.030
	Back Side	0.002	0.181	0.022	0.183	0.024
	Left Side	0.004	0.668	0.038	0.672	0.042
	Top Side	0.006			0.006	0.006

14. Uncertainty Assessment

According to KDB 865664 D01 SAR measurement 100 MHz to 6GHz, when the highest measured 1-g SAR is less than 1.5 W/kg and 10-g extremity SAR less than 3.75 W/kg, the expanded SAR measurement uncertainty must be less than 30% with a confidence interval of k=2. When these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE 1528-2013 is not required in the SAR report and submitted for equipment approval. For this device, both the 1-g SAR is less than 1.5 W/kg. Therefore the measurement uncertainty table is not required in this report.

Annex A General Information

1. Identification of the Responsible Testing Laboratory

Laboratory Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Laboratory Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China
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2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Address:	FL.3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China

Note：

The main report is end here and the other appendix (B,C,D,E) will be submitted separately.

****** END OF MAIN REPORT ******