

# TEST REPORT

Report No.: BCTC2411103360E

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Applicant: Acer India PVT Limited

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Product Name: Notebook

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Test Model: TRAVELLITE TL15-53M

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Tested Date: 2024-11-11 to 2024-11-25

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Issued Date: 2024-11-25


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**Shenzhen BCTC Testing Co., Ltd.**



## FCC ID: 2A94K-TL15-53M

Product Name: Notebook

Trademark: 

Model/Type Ref.: TRAVELLITE TL15-53M  
TRAVELLITE TL15-53M-G2

Applicant: Acer India PVT Limited

Address: Acer India PVT Limited, 6th Floor, Embassy Heights, No.13, Magrath Road, Bangalore, 560025, India

Manufacturer: Acer India PVT Limited

Address: RS No.38/2, Sedarapet Village Villianur Commune, Pondicherry 605111

Prepared By: Shenzhen BCTC Testing Co., Ltd.

Address: 1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China

Sample Received Date: 2024-11-11

Sample tested Date: 2024-11-11 to 2024-11-25

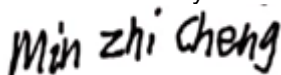
Issue Date: 2024-11-15

Test Standards: IEEE Std C95.1-2019  
IEEE Std 1528-2013  
FCC Part 2.1093

Test Results: PASS

Remark: This is SAR test report

Tested by:



Min Zhi Cheng/ Project Handler

Approved by:



Zero Zhou/Reviewer

The test report is effective only with both signature and specialized stamp. This result(s) shown in this report refer only to the sample(s) tested. Without written approval of Shenzhen BCTC Testing Co., Ltd, this report can't be reproduced except in full. The tested sample(s) and the sample information are provided by the client.

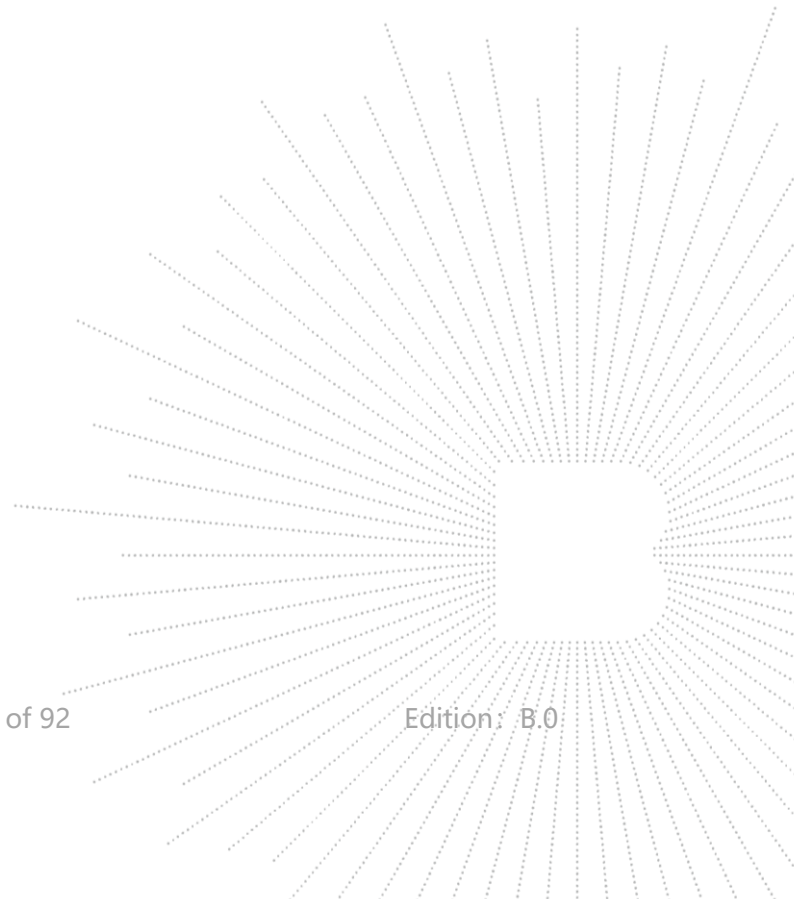
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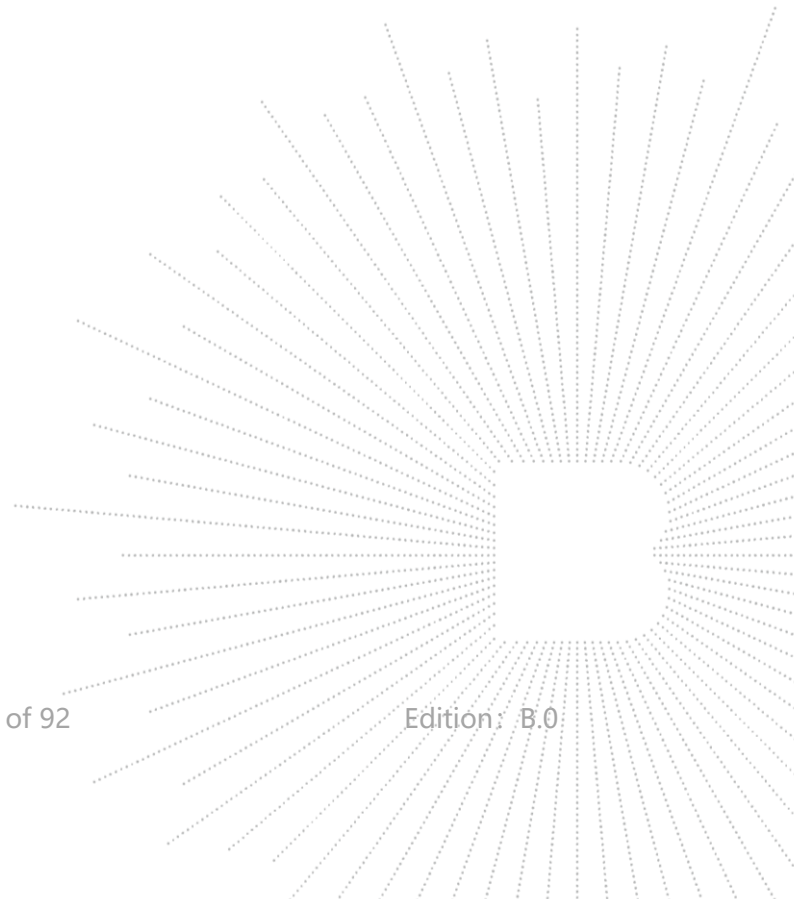
(Note: N/A Means Not Applicable)

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**1. Version**

| Report No.      | Issue Date | Description | Approved |
|-----------------|------------|-------------|----------|
| BCTC2411103360E | 2024-11-25 | Original    | Valid    |
|                 |            |             |          |



## 2. Test Standards

IEEE Std C95.1-2019: IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz. It specifies the maximum exposure limit of 1.6 W/kg as averaged over any 1 gram of tissue for portable devices being used within 20 cm of the user in the uncontrolled environment.

IEEE Std 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.

FCC Part 2.1093 Radiofrequency Radiation Exposure Evaluation: Portable Devices

KDB 447498 D01 General RF Exposure Guidance v06: Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies

KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04: SAR Measurement Requirements for 100 MHz to 6 GHz

KDB 865664 D02 RF Exposure Reporting v01r02: RF Exposure Compliance Reporting and Documentation Considerations

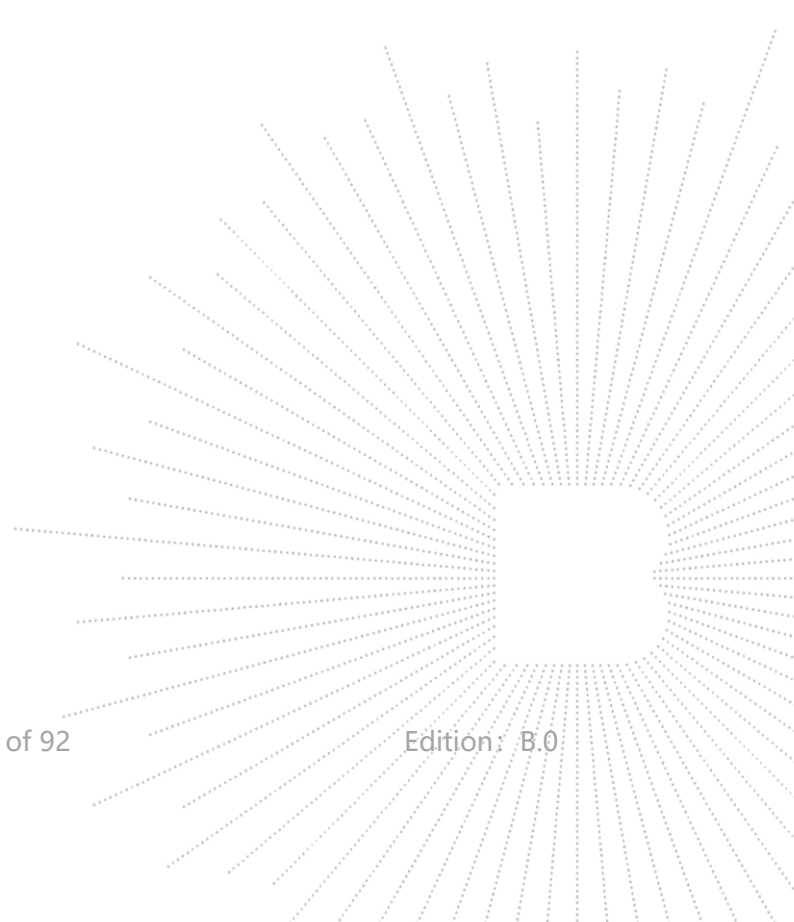
CO., LTD.

### 3. Test Summary

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

| Frequency Band            | Report SAR <sub>1g</sub> (W/kg) | SAR <sub>1g</sub> Limit (W/kg) |
|---------------------------|---------------------------------|--------------------------------|
|                           | Body (0mm Gap)                  |                                |
| Bluetooth                 | 0.075                           | 1.6                            |
| WIFI 2.4G(ANT-A)          | 1.042                           | 1.6                            |
| WIFI 2.4G(ANT-B)          | 0.300                           | 1.6                            |
| WIFI 5G(ANT-A)            | 0.403                           | 1.6                            |
| WIFI 5G(ANT-B)            | 0.532                           | 1.6                            |
| Simultaneous Transmission | 1.574                           | 1.6                            |

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 (2.1093) and ANSI/IEEE C95.1-2019, and had been tested in accordance with the measurement methods and procedure specified in IEEE 1528-2013.

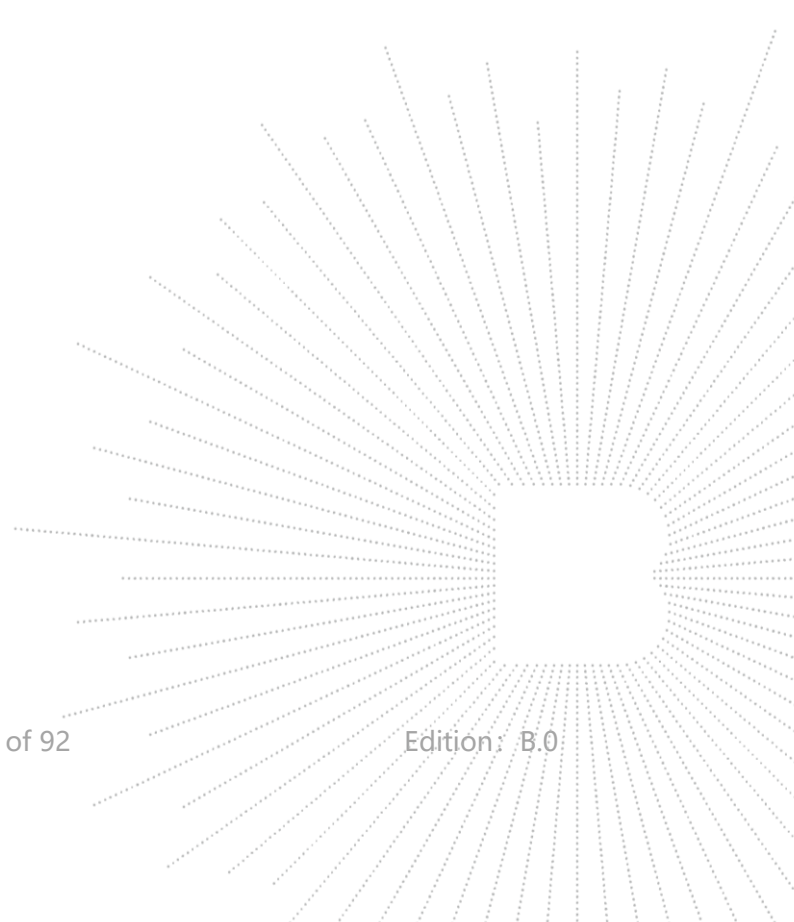


#### 4. SAR Limits

| EXPOSURE LIMITS  | FCC Limit (1g Tissue)  |  |
|--|--|--|
|  | SAR (W/kg)   |  |
|  | (General Population /<br>Uncontrolled Exposure<br>Environment) | (Occupational /<br>Controlled Exposure<br>Environment) |
| Spatial Average(averaged over the<br>whole body)             | 0.08   | 0.4  |
| Spatial Peak(averaged over any 1 g of<br>tissue)             | 1.6  | 8.0  |
| Spatial Peak(hands/wrists/<br>feet/anklesaveraged over 10 g) | 4.0  | 20.0   |

Population/Uncontrolled Environments are defined as locations where there is the exposure of individual who have no knowledge or control of their exposure.

Occupational/Controlled Environments are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure (i.e. as a result of employment or occupation).

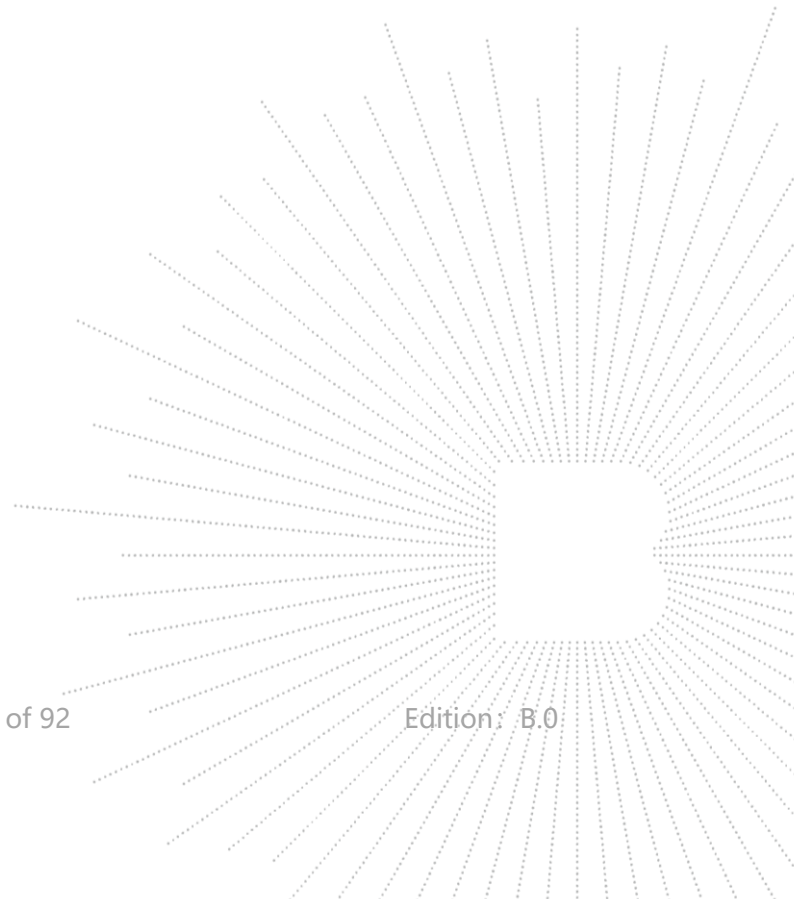




## 5. Measurement Uncertainty

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  $\leq 30\%$ , 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. Product Information and Test Setup

### 6.1 Product Information

|                        |  |
|------------------------|--|
| Test Model:            | TRAVELLITE TL15-53M<br>TRAVELLITE TL15-53M-G2  |
| Model differences:     | All the model are the same circuit and RF module, except model names and appearance of the color.  |
| Hardware Version:      | N/A  |
| Software Version:      | N/A  |
| Ratings:               | DC 20V from adapter or DC 11.4V from battery   |
| Adapter 1 Information: | MODEL: PA-1650-58<br>INPUT: 100-240V~ 1.6A 50-60Hz<br>OUTPUT: 5.0V=3.0A/9.0V=3.0A/12.0V=3.0A/15.0V=3.0A/20.0V=3.25A  |
| Adapter 2 Information: | MODEL: ADP-65KE D<br>INPUT: 100-240V~ 1.7A 50-60Hz<br>OUTPUT: 5.0V=3.0A/9.0V=3.0A/12.0V=3.0A/15.0V=3.0A/20.0V=3.25A  |
| <b>Bluetooth</b>       |  |
| Operation Frequency:   | 2402-2480MHz   |
| Type of Modulation:    | GFSK, $\pi/4$ DQPSK, 8DPSK   |
| Number Of Channel      | 79CH   |
| Antenna installation:  | Internal antenna   |
| Antenna Gain:          | 2.5 dBi<br>Remark:<br><input checked="" type="checkbox"/> The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information.<br><input type="checkbox"/> The antenna gain of the product is provided by the customer, and the test data is affected by the customer information. |
| <b>BLE</b>             |  |
| Operation Frequency:   | 2402-2480MHz   |
| Type of Modulation:    | GFSK   |
| Number Of Channel      | 40CH   |
| Antenna installation:  | Internal antenna   |
| Antenna Gain:          | 2.5 dBi<br>Remark:<br><input checked="" type="checkbox"/> The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information.<br><input type="checkbox"/> The antenna gain of the product is provided by the customer, and the test data is affected by the customer information. |

**WIFI 2.4G**

Operation Frequency: 802.11b/g/n20/ax20 MHz:2412~2462 MHz  
802.11n40/ax40 MHz:2422~2452 MHz

Bit Rate of Transmitter: 802.11b:11/5.5/2/1 Mbps  
802.11g:54/48/36/24/18/12/9/6Mbps  
802.11n Up to 150Mbps  
802.11ax:400Mbps

Type of Modulation: WIFI: OFDM/DSSS

Number Of Channel: 802.11b/g/n20/ax20MHz:11 CH  
802.11n40/ax40MHz: 7 CH

Antenna installation: Internal antenna\*2

Antenna Gain: WIFI(2.4GHz): Antenna A: 2.5 dBi, Antenna B: 2.43 dBi

**Remark:**

- ☒ The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information.
- ☐ The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

**WIFI 5G**

IEEE 802.11 WLAN Mode Supported 802.11a/n/ac/ax(20MHz channel bandwidth)  
802.11n/ac/ax(40MHz channel bandwidth)  
802.11ac/ax(80MHz channel bandwidth)

Operation Frequency: 5180-5240MHz for 802.11a/n/ax(HT20);  
5190-5230MHz for 802.11n/ax(HT40); 5210MHz for 802.11 ac/ax80;  
5745-5825 MHz for 802.11a/n/ax(HT20);  
5755-5795 MHz for 802.11n/ax(HT40); 5775MHz for 802.11 ac/ax80;

Data Rate 802.11a: 6,9,12,18,24,36,48,54Mbps;  
802.11n(HT20/HT40): MCS0-MCS15;  
802.11ac(VHT20): MCS0-MCS8  
802.11ac(VHT40/VHT80): MCS0-MCS9  
802.11ax (HE 20/HE 40/HE 80): MCS0~MCS11

Type of Modulation: OFDM with BPSK/QPSK/16QAM/64QAM for 802.11a/n  
OFDM with BPSK/QPSK/16QAM/64QAM/256QAM for 802.11ac  
OFDMA with BPSK / BPSK\_DCM /QPSK /QPSK\_DCM /QAM16 /QAM16\_DCM  
/QAM64 /QAM256 /QAM1024 for 802.11ax

Number Of Channel 4 channels for 802.11a/n20/ax20 in the 5180-5240MHz band ;  
2 channels for 802.11 n40/ax40 in the 5190-5230MHz band ;  
1 channels for 802.11 ac80/ax80 in the 5210MHz band ;  
5 channels for 802.11a/n20/ax20 in the 5745-5825MHz band ;  
2 channels for 802.11 n40/ax40 in the 5755-5795MHz band ;  
1 channels for 802.11 ac80/ax80 in the 5775MHz band

Antenna installation: Internal antenna

Antenna Gain: WIFI(5.1GHz): Antenna A: 1.96 dBi, Antenna B: 5.42 dBi  
WIFI(5.8GHz): Antenna A: 3.56 dBi, Antenna B: 2.93 dBi

**Remark:**

- ☒ The antenna gain of the product comes from the antenna report provided by the customer, and the test data is affected by the customer information.
- ☐ The antenna gain of the product is provided by the customer, and the test data is affected by the customer information.

## 6.2 Test Setup Configuration

See test photographs attached in EUT TEST SETUP PHOTOGRAPHS for the actual connections between Product and support equipment.

## 6.3 Support Equipment

Cable of Product

| No. | Cable Type | Quantity | Provider  | Length (m) | Shielded | Note |
|-----|------------|----------|-----------|------------|----------|------|
| 1   | --         | --       | Applicant | ---        | Yes/No   | --   |
| 2   | --         | --       | BCTC      | --         | Yes/No   | --   |

| No. | Device Type | Brand | Model | Series No. | Note |
|-----|-------------|-------|-------|------------|------|
| 1.  | ---         | ---   | ---   | ---        | ---  |
| 2.  | --          | --    | --    | --         | --   |

Notes:

1. All the equipment/cables were placed in the worst-case configuration to maximize the emission during the test.
2. Grounding was established in accordance with the manufacturer's requirements and conditions for the intended use.

## 6.4 Test Environment

1. Normal Test Conditions:

|                            |        |
|----------------------------|--------|
| Humidity(%):               | 35-75  |
| Atmospheric Pressure(kPa): | 95-105 |
| Temperature(°C):           | 18-25  |

2. Extreme Test Conditions:

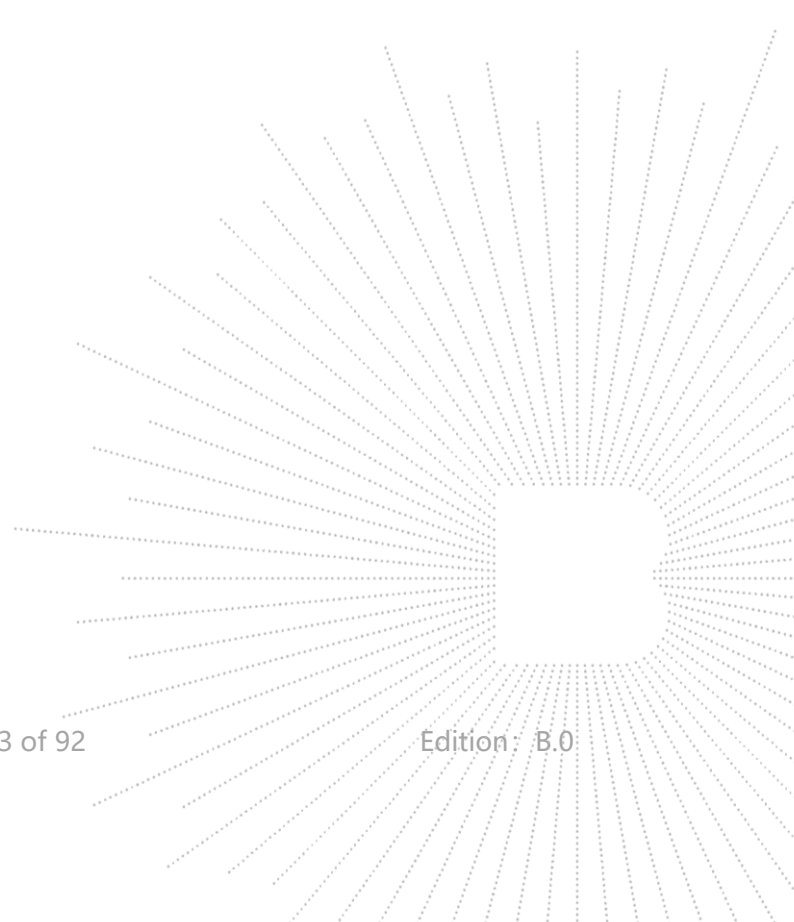
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## 7. Test Facility and Test Instrument Used

### 7.1 Test Facility

All measurement facilities used to collect the measurement data are located at Shenzhen BCTC Testing Co., Ltd. Address: 1-2/F., Building B, Pengzhou Industrial Park, No.158, Fuyuan 1st Road, Zhancheng, Fuhai Subdistrict, Bao'an District, Shenzhen, Guangdong, China. The site and apparatus are constructed in conformance with the requirements of ANSI C63.4 and CISPR 16-1-1 other equivalent standards.

FCC Test Firm Registration Number: 712850  
A2LA certificate registration number is: CN1212  
ISED Registered No.: 23583  
ISED CAB identifier: CN0017



## 7.2 Test Instrument Used

| Equipment                           | Manufacturer  | Model#   | Serial#                | Last Cal.     | Next Cal.     |
|-------------------------------------|---------------|----------|------------------------|---------------|---------------|
| PC                                  | DELL          | \        | \                      | N/A           | N/A           |
| SAR Measurement system              | SATIMO        | \        | \                      | N/A           | N/A           |
| Signal Generator                    | Keysight      | 83711B   | US37100131             | May 16, 2024  | May 15, 2025  |
| Multimeter                          | Keithley      | 1160271  | \                      | Nov. 10, 2024 | Nov 09, 2025  |
| S-parameter Network Analyzer        | R&S           | ZVB 8    | 101353                 | Dec. 07, 2023 | Dec. 06, 2024 |
| Communication test set              | R&S           | CMW500   | 126173                 | May 16, 2024  | May 15, 2025  |
| E SAR PROBE 6GHz                    | MVG           | SSE2     | 2623-EPGO-420          | July 18, 2024 | July 17, 2025 |
| DIPOLE 2450                         | SATIMO        | SID 2450 | SN 47/21 DIP 2G450-627 | Nov. 25, 2021 | Nov. 24, 2024 |
| DIPOLE 5000                         | SATIMO        | SID5000  | SN 47/21 DIP 2G450-629 | Nov. 25, 2021 | Nov. 24, 2024 |
| COMOSAR OPENCoaxial Probe           | SATIMO        | \        | \                      | Nov. 25, 2021 | Nov. 24, 2024 |
| SAR Locator                         | SATIMO        | \        | \                      | Nov. 25, 2021 | Nov. 24, 2024 |
| Communication Antenna               | SATIMO        | \        | \                      | Nov. 25, 2021 | Nov. 24, 2024 |
| FEATURE PHONEPOSITIONING DEVICE     | SATIMO        | \        | \                      | N/A           | N/A           |
| LIMESAR DIELECTRIC PROBE            | SATIMO        | \        | \                      | N/A           | N/A           |
| SAM Phantom                         | MVG           | \        | SN 13/09 SAM68         | N/A           | N/A           |
| Liquid measurement Kit              | HP            | 85033D   | 3423A08186             | N/A           | N/A           |
| Power meter                         | Keysight      | E4419    | A00065                 | May 16, 2024  | May 15, 2025  |
| Power sensor                        | Keysight      | E9300A   | US39211659             | May 16, 2024  | May 15, 2025  |
| Power sensor                        | Keysight      | E9300A   | US39211305             | May 16, 2024  | May 15, 2025  |
| Directional Coupler                 | Krytar 158020 | 131467   | \                      | Nov. 10, 2024 | Nov 09, 2025  |
| Thermometer                         | BTE           | \        | \                      | Dec. 02, 2023 | Dec. 01, 2024 |
| Broad Band Tissue Simulation Liquid | Schmid        | \        | \                      | N/A           | N/A           |

### Note:

Per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three year extended calibration interval. Each measured dipole is expected to evaluate with following criteria at least on annual interval.

1. There is no physical damage on the dipole;
2. System check with specific dipole is within 10% of calibrated values;
3. The most recent return-loss results, measured at least annually, deviates by no more than 20% from the previous measurement;
4. The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.

Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.

## 8. Specific Absorption Rate (SAR)

### 8.1 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 higher than the limits for general population/uncontrolled.

### 8.2 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 ( $\rho$ ). 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,  $\delta T$  is the temperature rise and  $\delta t$  is the exposure duration, or related to the

electrical field in the tissue by

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  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.



## 9. SAR Measurement System

### 9.1 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.

### 9.2 Probe

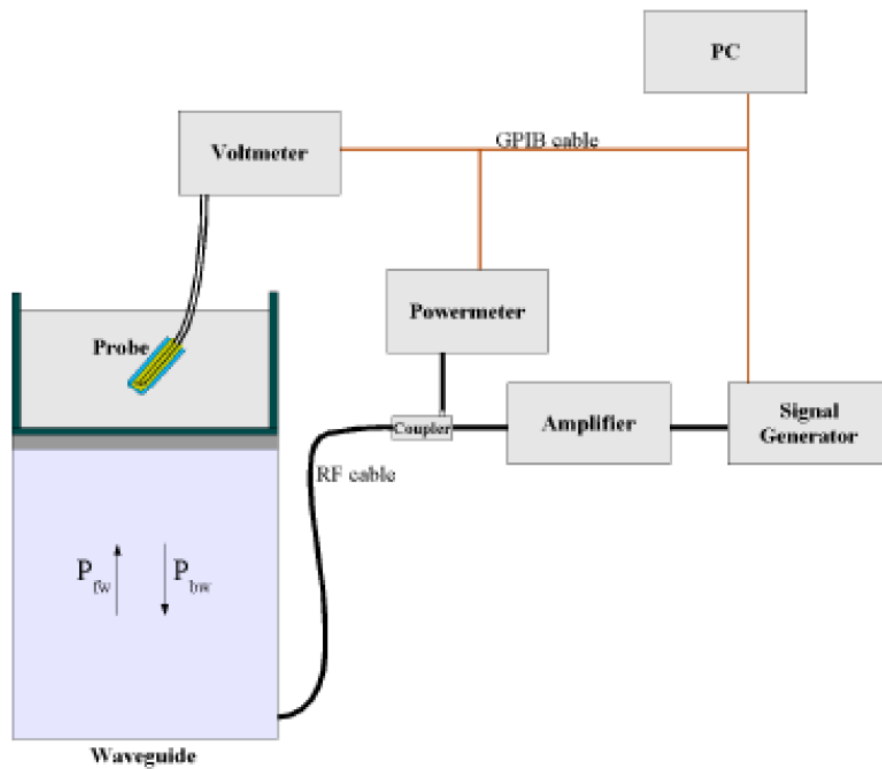
For the measurements the Specific Dosimetric E-Field Probe SN 46/21 EPGO362 with following specifications is used

- Dynamic range: 0.01-100 W/kg
- Tip Diameter : 5 mm
- Distance between probe tip and sensor center: 2.10mm
- 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: <0.50 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 EN 62209-1 and IEEE 1528 STD, with CALISAR, Antennassa proprietary calibration system. The calibration is performed with the EN 62209-1 annex technique using reference guide at the five frequencies.





$$SAR = \frac{4(p_{fw} - p_{pbw})}{ab\delta} \cos^2 \left( \pi \frac{y}{a} \right) c^{(2\pi/\delta)}$$

Where :

P<sub>fw</sub> = Forward Power

P<sub>bw</sub> = Backward Power

a and b = Waveguide dimensions

l = 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:

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

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

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

where DCP is the diode compression point in mV.

### 9.3 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/cm<sup>2</sup>) 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/cm<sup>2</sup>.

#### 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.

Where:

$$SAR = C \frac{\Delta T}{\Delta t}$$

$\Delta t$  = exposure time (30 seconds),

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

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

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

Where:

$\sigma$  = simulated tissue conductivity,

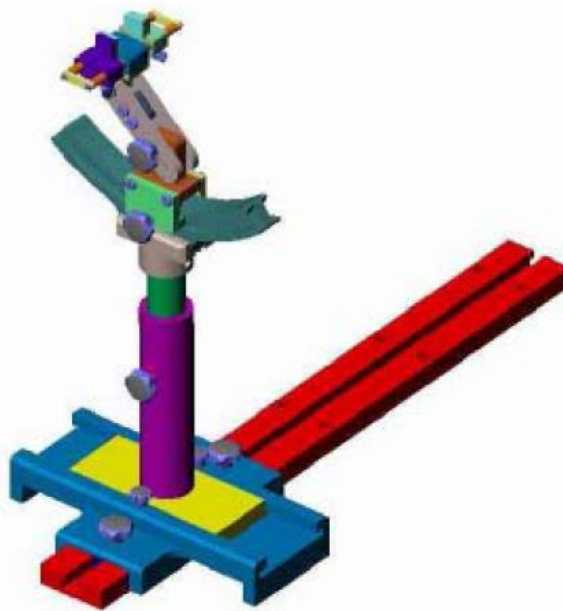
$\rho$  = Tissue density (1.25 g/cm<sup>3</sup> for brain tissue)

#### 9.4 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.

#### 9.5 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        |

## 10. Tissue Simulating Liquids

### 10.1 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 (MHz)  | Water (%) | Salt (%) | 1,2-Propane diol (%) | HEC (%) | Preventol (%) | DGBE (%) |
|------------------|-----------|----------|----------------------|---------|---------------|----------|
| <b>Head/Body</b> |           |          |                      |         |               |          |
| 835              | 40.3      | 1.4      | 57.9                 | 0.2     | 0.2           | 0        |
| 900              | 40.3      | 1.4      | 57.9                 | 0.2     | 0.2           | 0        |
| 1800-2000        | 55.2      | 0.3      | 0                    | 0       | 0             | 44.5     |
| 2450             | 55.0      | 0.1      | 0                    | 0       | 0             | 44.9     |
| 2600             | 54.9      | 0.1      | 0                    | 0       | 0             | 45.0     |

| Frequency (MHz)  | Water (%) | Hexyl Carbitol (%) | Triton X-100 (%) |
|------------------|-----------|--------------------|------------------|
| <b>Head/Body</b> |           |                    |                  |
| 5000-6000        | 65.52     | 17.24              | 17.24            |

## 10.2 Limit

The head tissue dielectric parameters recommended by the IEEE SCC-34/SC-2 in P1528 have been incorporated in the following table. These head parameters are derived from planar layer models simulating the highest expected SAR for the dielectric properties and tissue thickness variations in a human head. Other head and body tissue parameters that have not been specified in P1528 are derived from the tissue dielectric parameters

computed from the 4-Cole-Cole equations described in Reference [12] and extrapolated according to the head parameters specified in P1528.

| Target Frequency (MHz) | Head                      |                               |
|------------------------|---------------------------|-------------------------------|
|                        | Conductivity ( $\sigma$ ) | Permittivity ( $\epsilon_r$ ) |
| 150                    | 0.76                      | 52.3                          |
| 300                    | 0.87                      | 45.3                          |
| 450                    | 0.87                      | 43.5                          |
| 750                    | 0.89                      | 41.9                          |
| 835                    | 0.90                      | 41.5                          |
| 900                    | 0.97                      | 41.5                          |
| 915                    | 0.98                      | 41.5                          |
| 1450                   | 1.20                      | 40.5                          |
| 1610                   | 1.29                      | 40.3                          |
| 1800-2000              | 1.40                      | 40.0                          |
| 2450                   | 1.80                      | 39.2                          |
| 2600                   | 1.96                      | 39.0                          |
| 3000                   | 2.40                      | 38.5                          |
| 5200                   | 4.66                      | 36.0                          |
| 5400                   | 4.86                      | 35.8                          |
| 5600                   | 5.07                      | 35.5                          |
| 5800                   | 5.27                      | 35.3                          |

### 10.3 Tissue Calibration Result

The dielectric parameters of the liquids were verified prior to the SAR evaluation using an R&S ZVB 8. Dielectric Probe Kit and an Agilent Network Analyzer.

Calibration Result for Dielectric Parameters of Tissue Simulating Liquid

| Frequency (MHz) | Liquid | Target ( $\sigma$ ) | Target ( $\epsilon_r$ ) | Measured ( $\sigma$ ) | Measured ( $\epsilon_r$ ) | Delta ( $\sigma$ )% | Delta ( $\epsilon_r$ )% | Limit (%) | Temp. TSL (°C) | Date       |
|-----------------|--------|---------------------|-------------------------|-----------------------|---------------------------|---------------------|-------------------------|-----------|----------------|------------|
| 2450            | Head   | 1.80                | 39.20                   | 1.754                 | 38.182                    | -2.56               | -2.60                   | ±5        | 23.3           | 15/11/2024 |
| 5200            | Head   | 4.66                | 36.00                   | 4.783                 | 36.921                    | 2.64                | 2.56                    | ±5        | 23.3           | 15/11/2024 |
| 5800            | Head   | 5.27                | 35.30                   | 5.175                 | 34.408                    | -1.80               | -2.53                   | ±5        | 23.3           | 15/11/2024 |

**Remark:**

1. The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within  $\pm 2^\circ\text{C}$  of the temperature when the tissue parameters are characterized.
2. 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.

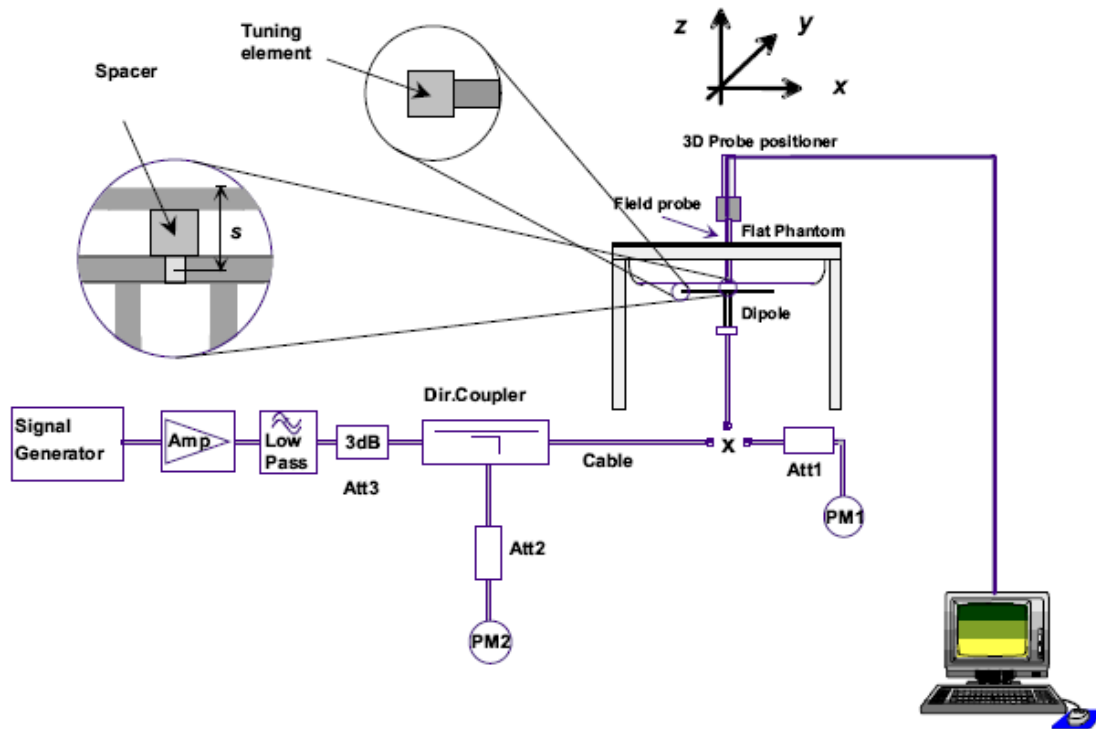
## 11. System Check

### 11.1 Purpose of System Performance Check

At the device test frequencies. System check verifies the measurement repeatability of a SAR system before compliance testing and is not a validation of all system specifications. The latter is not required for testing a device but is mandatory before the system is deployed. The system check detects possible short-term drift and unacceptable measurement errors or uncertainties in the system.

### 11.2 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 600MHz-6000MHz. 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 output power on dipole port must be calibrated to 20 dBm (100 mW) before dipole is connected.



System Verification Setup Block Diagram





Setup Photo of Dipole Antenna

### 11.3 Validation Results

Comparing to the original SAR value provided by SATIMO, the validation data should be within its specification of 10 %. The following table 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 (MHz) | Power | Measured SAR <sub>1g</sub> (W/Kg) | Normalize to 1 Watt | Drift (%) | 1W Target                | Difference Percentage (%) | Limit (%) | Liquid Temp | Date       |
|-----------------|-------|-----------------------------------|---------------------|-----------|--------------------------|---------------------------|-----------|-------------|------------|
|                 |       |                                   |                     |           | SAR <sub>1g</sub> (W/Kg) |                           |           |             |            |
| 2450            | 250mW | 13.757                            | 55.027              | -0.376    | 55.16                    | -0.241                    | ±10       | 23.4        | 15/11/2024 |
| 5200            | 250mW | 19.449                            | 77.794              | -1.478    | 76.41                    | 1.811                     | ±10       | 23.4        | 15/11/2024 |
| 5800            | 250mW | 19.722                            | 78.888              | -1.006    | 76.49                    | 3.135                     | ±10       | 23.4        | 15/11/2024 |



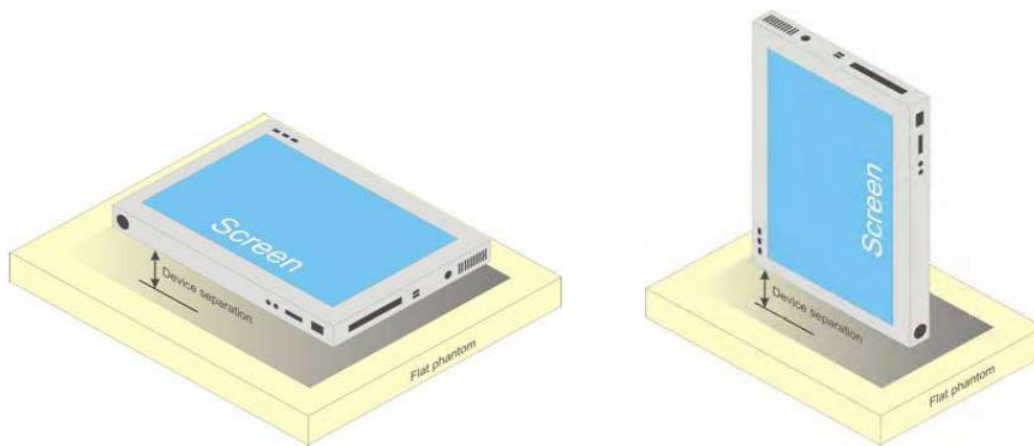
## 12. EUT Testing Position

### Body Position

A typical example of a body supported device is a wireless enabled laptop device that among other orientations may be supported on the thighs of a sitting user. To represent this orientation, the device shall be positioned with its base against the flat phantom. Other orientations may be specified by the manufacturer in the user instructions. If the intended use is not specified, the device shall be tested directly against the flat phantom in all usable orientations.

The example shows a tablet form factor portable computer for which SAR should be separately assessed with

- a). each surface and
- b). the separation distances



Tablet form factor portable computer

## 13. SAR Measurement Procedures

### 13.1 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

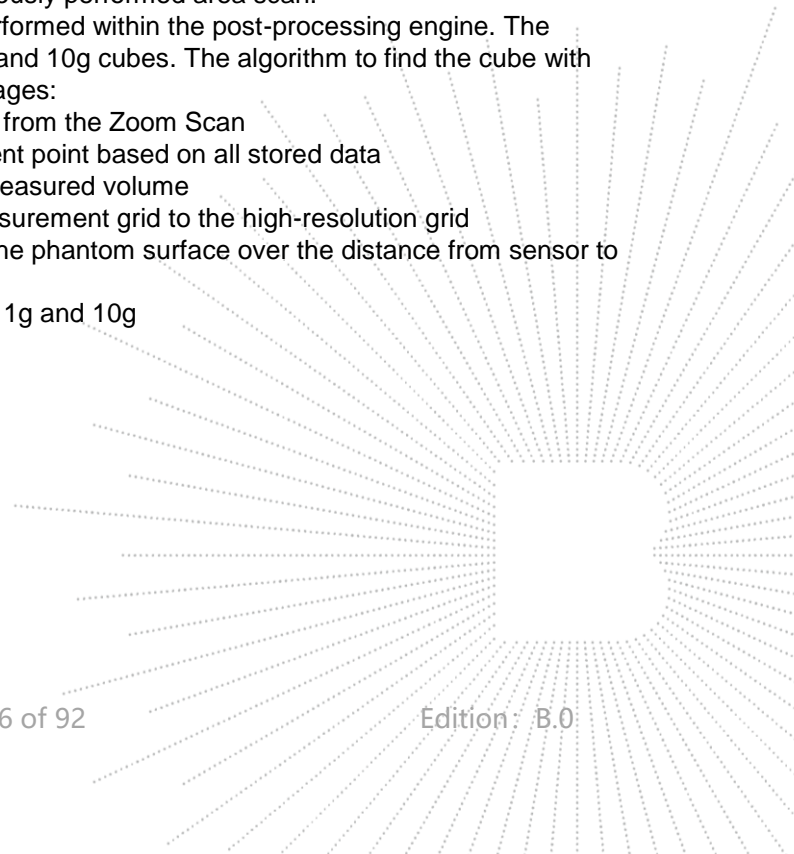
### 13.2 Spatial Peak SAR Evaluation

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 from 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



### 13.3 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.

|   |                                    |  | $\leq 3$ GHz   | $> 3$ GHz   |
|---|------------------------------------|--|--|---|
| Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface  |                                    |  | 5 mm $\pm$ 1 mm  | $\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm $\pm$ 0.5 mm                       |
| Maximum probe angle from probe axis to phantom surface normal at the measurement location   |                                    |  | 30° $\pm$ 1°   | 20° $\pm$ 1°  |
| Maximum area scan spatial resolution: $\Delta x_{Area}$ , $\Delta y_{Area}$   |                                    |  | $\leq 2$ GHz: $\leq 15$ mm<br>2 – 3 GHz: $\leq 12$ mm  | 3 – 4 GHz: $\leq 12$ mm<br>4 – 6 GHz: $\leq 10$ mm                            |
|   |                                    |  | When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device. |   |
| Maximum zoom scan spatial resolution: $\Delta x_{Zoom}$ , $\Delta y_{Zoom}$   |                                    |  | $\leq 2$ GHz: $\leq 8$ mm<br>2 – 3 GHz: $\leq 5$ mm*   | 3 – 4 GHz: $\leq 5$ mm*<br>4 – 6 GHz: $\leq 4$ mm*                            |
| Maximum zoom scan spatial resolution, normal to phantom surface   | uniform grid: $\Delta z_{Zoom}(n)$ |  | $\leq 5$ mm  | 3 – 4 GHz: $\leq 4$ mm<br>4 – 5 GHz: $\leq 3$ mm<br>5 – 6 GHz: $\leq 2$ mm    |
|   | graded grid                        | $\Delta z_{Zoom}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface | $\leq 4$ mm  | 3 – 4 GHz: $\leq 3$ mm<br>4 – 5 GHz: $\leq 2.5$ mm<br>5 – 6 GHz: $\leq 2$ mm  |
|   |                                    | $\Delta z_{Zoom}(n>1)$ : between subsequent points                                   | $\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$ mm   |   |
| Minimum zoom scan volume  | x, y, z                            |  | $\geq 30$ mm   | 3 – 4 GHz: $\geq 28$ mm<br>4 – 5 GHz: $\geq 25$ mm<br>5 – 6 GHz: $\geq 22$ mm |
| Note: $\delta$ 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 <u>area scan based 1-g SAR estimation</u> procedures of KDB Publication 447498 is $\leq 1.4$ W/kg, $\leq 8$ mm, $\leq 7$ mm and $\leq 5$ 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. |                                    |  |  |   |

### 13.4 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.

### 13.5 SAR Averaged Methods

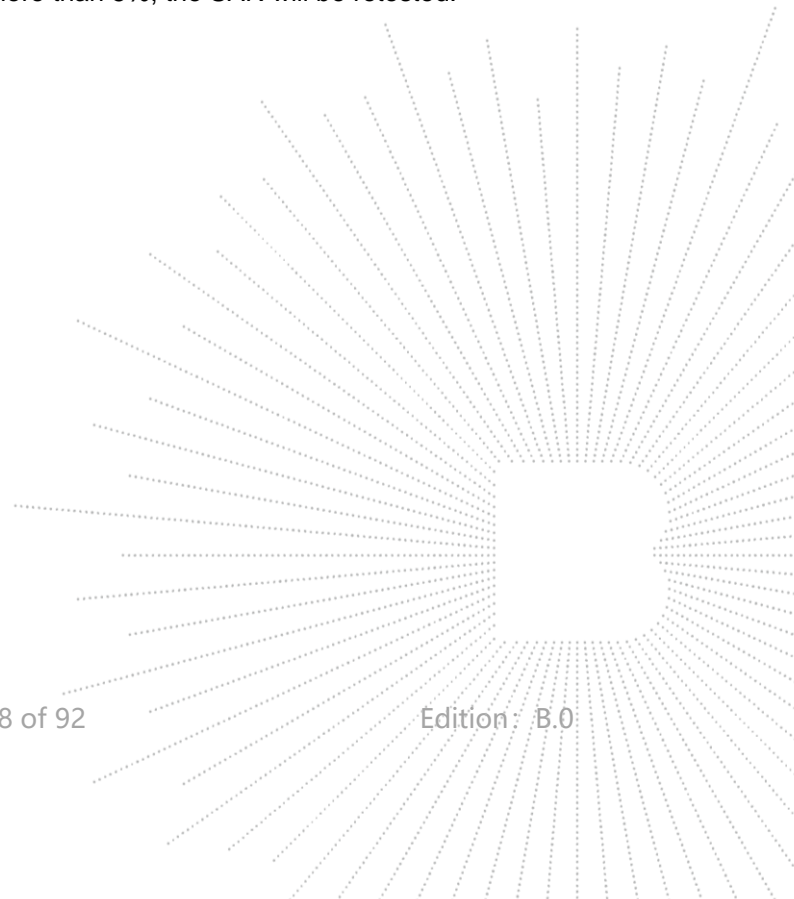
The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimize measurements errors, but the highest local SAR will occur at the surface of the phantom.

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.

### 13.6 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.



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## 14. SAR Test Result

### 14.1 Conducted RF Output Power

| BDR, EDR   |                 |                       |                     |
|------------|-----------------|-----------------------|---------------------|
| Modulation | Frequency (MHz) | Conducted Power (dBm) | Tune-up power (dBm) |
| 1-DH1      | 2402            | -1.43                 | -0.5                |
| 1-DH1      | 2441            | -1.12                 |                     |
| 1-DH1      | 2480            | -0.84                 |                     |
| 2-DH1      | 2402            | -0.46                 | 0.5                 |
| 2-DH1      | 2441            | -0.20                 |                     |
| 2-DH1      | 2480            | 0.16                  |                     |
| 3-DH1      | 2402            | -0.21                 | 0.5                 |
| 3-DH1      | 2441            | 0.09                  |                     |
| 3-DH1      | 2480            | 0.37                  |                     |

| BLE        |                 |                       |                     |
|------------|-----------------|-----------------------|---------------------|
| Modulation | Frequency (MHz) | Conducted Power (dBm) | Tune-up power (dBm) |
| GFSK 1Mbps | 2402            | 1.66                  | 2.5                 |
| GFSK 1Mbps | 2440            | 1.82                  |                     |
| GFSK 1Mbps | 2480            | 2.30                  |                     |
| GFSK 2Mbps | 2402            | 1.69                  | 2.5                 |
| GFSK 2Mbps | 2440            | 1.84                  |                     |
| GFSK 2Mbps | 2480            | 2.30                  |                     |

Note:

Per KDB 447498 D01v06, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm are determined by:

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

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

| Turn up Power (dBm) | Turn up Power (mW) | Separation Distance (mm) | Frequency (MHz) | Result | Exclusion Thresholds |
|---------------------|--------------------|--------------------------|-----------------|--------|----------------------|
| 2.5                 | 1.78               | 5                        | 2450            | 0.56   | 3                    |

Per KDB 447498 D01v06, when the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion.

According to the calculation results in the table above, Bluetooth SAR does not need to be tested.

| WIFI 2.4G  |                 |                       |       |       |                     |       |       |
|------------|-----------------|-----------------------|-------|-------|---------------------|-------|-------|
| Modulation | Frequency (MHz) | Conducted Power (dBm) |       |       | Tune-up power (dBm) |       |       |
|            |                 | ANT A                 | ANT B | Total | ANT A               | ANT B | Total |
| b          | 2412            | 11.18                 | 13.48 | /     | 11.5                | 13.5  | /     |
| b          | 2437            | 11.40                 | 13.41 | /     |                     |       |       |
| b          | 2462            | 11.34                 | 13.37 | /     |                     |       |       |
| g          | 2412            | 10.15                 | 11.35 | /     | 10.5                | 11.5  | /     |
| g          | 2437            | 10.43                 | 11.31 | /     |                     |       |       |
| g          | 2462            | 10.27                 | 11.25 | /     |                     |       |       |
| n20        | 2412            | 9.01                  | 10.19 | 12.65 | 9.5                 | 10.5  | 13.0  |
| n20        | 2437            | 9.20                  | 10.22 | 12.75 |                     |       |       |
| n20        | 2462            | 9.17                  | 10.24 | 12.75 |                     |       |       |
| n40        | 2422            | 7.40                  | 8.34  | 10.91 | 8.0                 | 8.5   | 11.5  |
| n40        | 2437            | 7.58                  | 8.43  | 11.04 |                     |       |       |
| n40        | 2452            | 7.48                  | 8.37  | 10.96 |                     |       |       |
| ax20       | 2412            | 8.89                  | 10.11 | 12.55 | 9.5                 | 10.5  | 13.0  |
| ax20       | 2437            | 9.11                  | 10.03 | 12.60 |                     |       |       |
| ax20       | 2462            | 8.96                  | 9.98  | 12.51 |                     |       |       |
| ax40       | 2422            | 6.96                  | 8.04  | 10.54 | 7.5                 | 8.5   | 11.0  |
| ax40       | 2437            | 7.21                  | 8.06  | 10.67 |                     |       |       |
| ax40       | 2452            | 7.13                  | 8.08  | 10.64 |                     |       |       |



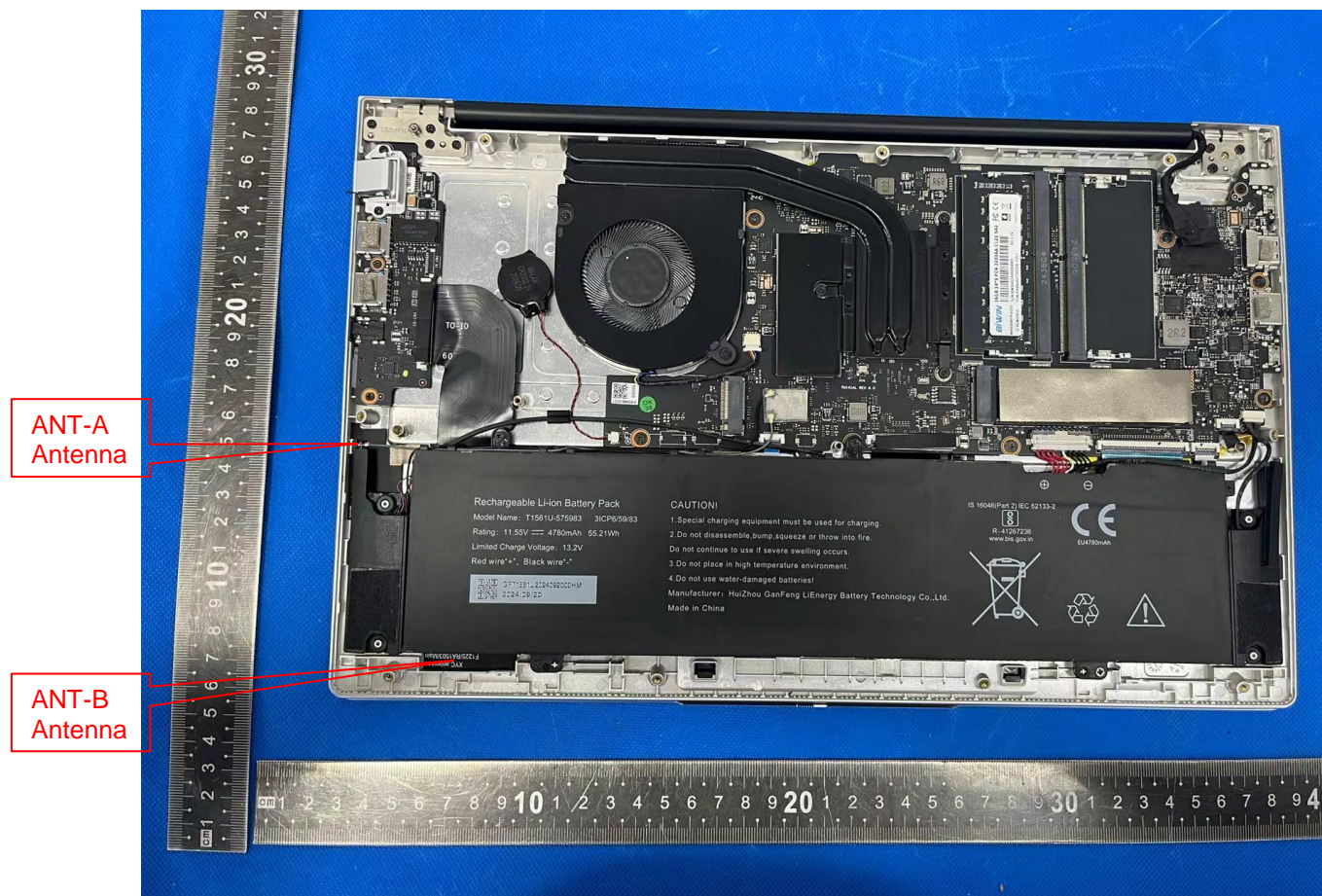
| WIFI 5.2G  |                 |                       |       |       |                     |       |       |
|------------|-----------------|-----------------------|-------|-------|---------------------|-------|-------|
| Modulation | Frequency (MHz) | Conducted Power (dBm) |       |       | Tune-up power (dBm) |       |       |
|            |                 | ANT A                 | ANT B | Total | ANT A               | ANT B | Total |
| a          | 5180            | 13.00                 | 13.28 | /     | 13.5                | 14.0  | /     |
| a          | 5200            | 12.89                 | 12.76 | /     |                     |       |       |
| a          | 5240            | 12.33                 | 13.78 | /     |                     |       |       |
| n20        | 5180            | 11.71                 | 12.55 | 15.16 | 12.0                | 13.0  | 15.5  |
| n20        | 5200            | 11.21                 | 11.92 | 14.59 |                     |       |       |
| n20        | 5240            | 11.88                 | 12.26 | 15.08 |                     |       |       |
| n40        | 5190            | 9.63                  | 10.08 | 12.87 | 10.5                | 11.0  | 14.0  |
| n40        | 5230            | 10.41                 | 10.69 | 13.56 |                     |       |       |
| ac20       | 5180            | 11.90                 | 12.65 | 15.30 | 12.0                | 13.0  | 15.5  |
| ac20       | 5200            | 11.38                 | 11.97 | 14.70 |                     |       |       |
| ac20       | 5240            | 11.74                 | 12.43 | 15.11 |                     |       |       |
| ac40       | 5190            | 9.51                  | 10.10 | 12.83 | 10.5                | 11.0  | 13.5  |
| ac40       | 5230            | 10.28                 | 10.68 | 13.49 |                     |       |       |
| ac80       | 5210            | 8.55                  | 8.93  | 11.75 | 9.0                 | 9.0   | 12.0  |
| ax20       | 5180            | 11.87                 | 12.89 | 15.42 | 12.0                | 13.0  | 15.5  |
| ax20       | 5200            | 11.50                 | 12.37 | 14.97 |                     |       |       |
| ax20       | 5240            | 11.51                 | 11.97 | 14.76 |                     |       |       |
| ax40       | 5190            | 9.06                  | 9.86  | 12.49 | 10.0                | 10.5  | 13.5  |
| ax40       | 5230            | 9.84                  | 10.28 | 13.08 |                     |       |       |
| ax80       | 5210            | 8.23                  | 8.51  | 11.38 | 8.5                 | 9.0   | 11.5  |

| WIFI 5.8G  |                    |                       |       |       |                     |       |       |
|------------|--------------------|-----------------------|-------|-------|---------------------|-------|-------|
| Modulation | Frequency<br>(MHz) | Conducted Power (dBm) |       |       | Tune-up power (dBm) |       |       |
|            |                    | ANT A                 | ANT B | Total | ANT A               | ANT B | Total |
| a          | 5745               | 10.21                 | 10.36 | /     | 10.5                | 10.5  | /     |
| a          | 5785               | 9.89                  | 9.95  | /     |                     |       |       |
| a          | 5825               | 9.74                  | 9.74  | /     |                     |       |       |
| n20        | 5745               | 9.20                  | 9.34  | 12.28 | 9.5                 | 9.5   | 12.5  |
| n20        | 5785               | 8.94                  | 9.06  | 12.01 |                     |       |       |
| n20        | 5825               | 8.75                  | 8.72  | 11.75 |                     |       |       |
| n40        | 5755               | 8.50                  | 8.52  | 11.52 | 9.0                 | 9.0   | 12.0  |
| n40        | 5795               | 8.22                  | 8.19  | 11.22 |                     |       |       |
| ac20       | 5745               | 9.23                  | 9.35  | 12.30 | 9.5                 | 9.5   | 12.5  |
| ac20       | 5785               | 8.98                  | 9.06  | 12.03 |                     |       |       |
| ac20       | 5825               | 8.78                  | 8.74  | 11.77 |                     |       |       |
| ac40       | 5755               | 8.46                  | 8.52  | 11.50 | 8.5                 | 9.0   | 12.0  |
| ac40       | 5795               | 8.22                  | 8.13  | 11.19 |                     |       |       |
| ac80       | 5775               | 7.50                  | 7.55  | 10.54 | 8.0                 | 8.0   | 11.0  |
| ax20       | 5745               | 9.01                  | 9.28  | 12.16 | 9.5                 | 9.5   | 12.5  |
| ax20       | 5785               | 8.77                  | 8.99  | 11.89 |                     |       |       |
| ax20       | 5825               | 8.56                  | 8.54  | 11.56 |                     |       |       |
| ax40       | 5755               | 8.27                  | 8.28  | 11.29 | 8.5                 | 8.5   | 11.5  |
| ax40       | 5795               | 7.85                  | 7.92  | 10.90 |                     |       |       |
| ax80       | 5775               | 7.19                  | 7.36  | 10.29 | 7.5                 | 7.5   | 10.5  |



## 14.2 Transmit Antennas and SAR Measurement Position

### EUT Antenna Location:



| Antenna information |                  |
|---------------------|------------------|
| Antenna             | Function         |
| ANT-A               | WIFI + Bluetooth |
| ANT-B               | WIFI             |

| Body mode: Positions for SAR tests |            |           |          |             |           |            |
|------------------------------------|------------|-----------|----------|-------------|-----------|------------|
| Mode                               | Front Face | Back Face | Top Side | Bottom Side | Left Side | Right Side |
| ANT-A                              | /          | <25       | 124      | 63          | 331       | <25        |
| ANT-B                              | /          | <25       | 203      | <25         | 288       | 33         |

### 14.3 Measured and Reported (Scaled) SAR Results

| WIFI 2.4G (ANT-A)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11b | Back Face     | 2437        | 11.40              | 11.5          | 1.023                  | 0.417        | 0.427        | 1        |
|                        | 802.11b | Right Side    | 2437        | 11.40              | 11.5          | 1.023                  | 0.520        | <b>0.532</b> |          |

| WIFI 2.4G (ANT-B)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11b | Back Face     | 2412        | 13.48              | 13.5          | 1.005                  | 0.513        | 0.515        | 2        |
|                        | 802.11b | Bottom Side   | 2412        | 13.48              | 13.5          | 1.005                  | 0.559        | <b>0.562</b> |          |

| WIFI 5.2G (ANT-A)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11a | Back Face     | 5180        | 13.00              | 13.5          | 1.122                  | 0.353        | 0.396        | 3        |
|                        | 802.11a | Right Side    | 5180        | 13.00              | 13.5          | 1.122                  | 0.678        | <b>0.761</b> |          |

| WIFI 5.2G (ANT-B)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11a | Back Face     | 5240        | 13.78              | 14.0          | 1.052                  | 0.496        | 0.522        | 4        |
|                        | 802.11a | Bottom Side   | 5240        | 13.78              | 14.0          | 1.052                  | 0.551        | <b>0.580</b> |          |

| WIFI 5.8G (ANT-A)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11a | Back Face     | 5745        | 10.21              | 10.5          | 1.069                  | 0.279        | 0.298        | 5        |
|                        | 802.11a | Right Side    | 5745        | 10.21              | 10.5          | 1.069                  | 0.583        | <b>0.623</b> |          |

| WIFI 5.8G (ANT-B)      |         |               |             |                    |               |                        |              |              |          |
|------------------------|---------|---------------|-------------|--------------------|---------------|------------------------|--------------|--------------|----------|
| RF Exposure Conditions | Mode    | Test Position | Freq. (MHz) | Output Power (dBm) | Turn up (dBm) | Turn-up Scaling Factor | SAR1g (W/kg) |              | Plot No. |
|                        |         |               |             |                    |               |                        | Meas.        | Scaled       |          |
| Body (0mm)             | 802.11a | Back Face     | 5745        | 10.36              | 10.5          | 1.033                  | 0.393        | 0.406        | 6        |
|                        | 802.11a | Bottom Side   | 5745        | 10.36              | 10.5          | 1.033                  | 0.419        | <b>0.433</b> |          |

## 14.4 SAR Measurement Variability

According to KDB865664, Repeated measurements are required only when the measured SAR is  $\geq 0.80$  W/kg. If the measured SAR value of the initial repeated measurement is  $< 1.45$  W/kg with  $\leq 20\%$  variation, only one repeated measurement is required to reaffirm that the results are not expected to have substantial variations, which may introduce significant compliance concerns. A second repeated measurement is required only if the measured result for the initial repeated measurement is within 10% of the SAR limit and vary by more than 20%, which are often related to device and measurement setup difficulties. The following procedures are applied to determine if repeated measurements are required. The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.<sup>19</sup> The repeated measurement results must be clearly identified in the SAR report. All measured SAR, including the repeated results, must be considered to determine compliance and for reporting according to KDB 690783. Repeated measurement is not required when the original highest measured SAR is  $< 0.80$  W/kg; steps 2) through 4) do not apply.

- 1) When the original highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
- 2) 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  $\geq 1.45$  W/kg ( $\sim 10\%$  from the 1-g SAR limit).
- 3) 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  $> 1.20$ .
- 4) 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  $> 1.20$ .

| Test Mode | Frequency Band (MHz) | RF Exposure Configuration | Test Position | Repeated SAR (yes/no) | Highest Measured SAR1-g (W/Kg) | First Repeated         |                               |
|-----------|----------------------|---------------------------|---------------|-----------------------|--------------------------------|------------------------|-------------------------------|
|           |                      |                           |               |                       |                                | Measured SAR1-g (W/Kg) | Largest to Smallest SAR Ratio |
| /         | /                    | /                         | /             | /                     | /                              | /                      | /                             |
| /         | /                    | /                         | /             | /                     | /                              | /                      | /                             |
| /         | /                    | /                         | /             | /                     | /                              | /                      | /                             |





## 14.5 Simultaneous Transmission Evaluation

Simultaneous transmission SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneous transmitting antenna.

Application Simultaneous Transmission information:

| No. | Configurations | Body SAR |
|-----|----------------|----------|
| 1   | ANT-A + ANT-B  | 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) · [√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

| Estimated stand alone SAR |                 |                     |                    |                          |     |                         |
|---------------------------|-----------------|---------------------|--------------------|--------------------------|-----|-------------------------|
| Communication system      | Frequency (MHz) | Maximum Power (dBm) | Maximum Power (mW) | Separation Distance (mm) | X   | Estimated SAR1-g (W/kg) |
| Bluetooth                 | 2480            | 2.5                 | 1.78               | 5                        | 3.0 | 0.075                   |
| Bluetooth                 | 2480            | 2.5                 | 1.78               | 10                       | 7.5 | 0.037                   |

Note:

1. Maximum average power including tune-up tolerance;
2. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion

2. Per FCC KD B447498 D01, simultaneous transmission SAR test exclusion may be applied when the sum of the 1-g SAR for all the transmitting antenna in a specific a physical test configuration is ≤1.6 W/Kg. When the sum is greater than the SAR limit, SAR test exclusion is determined by the SAR to peak location separation ratio.

$$\text{Ratio} = \frac{(\text{SAR}_1 + \text{SAR}_2)^{1.5}}{(\text{peak location separation, mm})} < 0.04$$

3. Simultaneous transmission of maximum SAR sum calculation.

| RF Exposure Conditions | Test Position | Standalone SAR (W/kg) |       | Summed SAR (W/kg) |
|------------------------|---------------|-----------------------|-------|-------------------|
|                        |               | ANT-A                 | ANT-B |                   |
| Body                   | Front Face    | /                     | /     | /                 |
|                        | Back Face     | 0.427                 | 0.522 | 0.949             |
|                        | Left Side     | /                     | /     | /                 |
|                        | Right Side    | 0.761                 | /     | 0.761             |
|                        | Top Side      | /                     | /     | /                 |
|                        | Bottom Side   | /                     | 0.580 | 0.580             |

## 15. Test Plots

### 15.1 System Performance Check

#### System check at 2450 MHz

Date of measurement: 6/9/2024

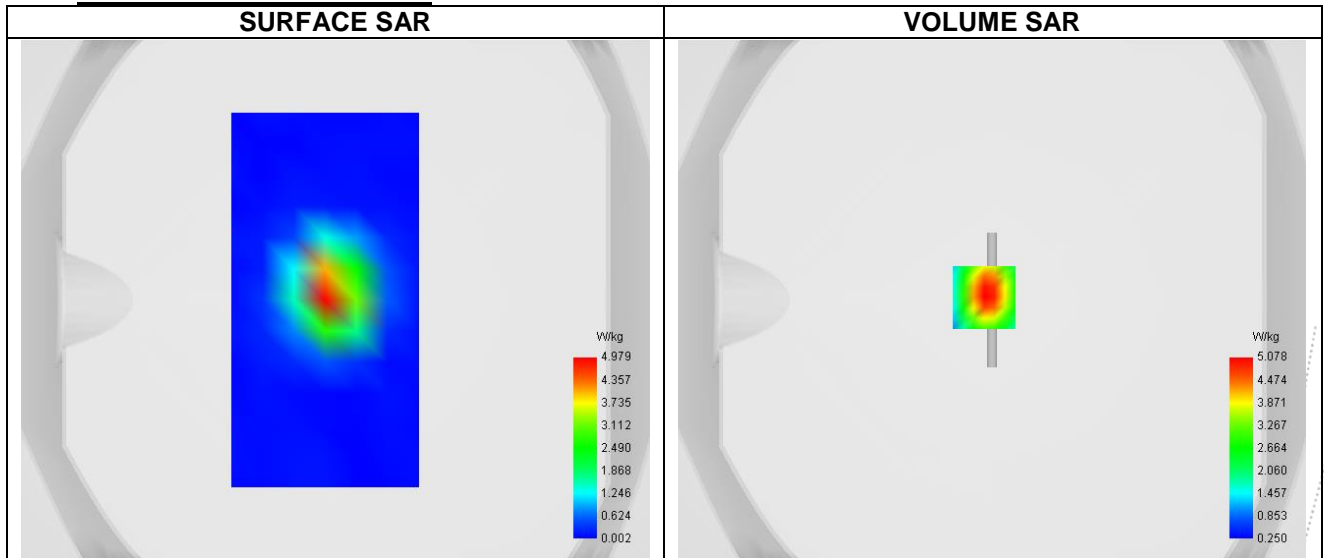
##### A. Experimental conditions.

|                 |                             |
|-----------------|-----------------------------|
| Probe           | SN 26/23 EPG0420            |
| ConvF           | 1.32                        |
| Area Scan       | surf_sam_plan.txt           |
| Zoom Scan       | 7x7x12,dx=8mm dy=8mm dz=5mm |
| Phantom         | Validation plane            |
| Device Position | Dipole                      |
| Band            | CW2450                      |
| Signal          | CW                          |

##### B. Permittivity

|  |          |
|--|----------|
| Frequency (MHz)                        | 2450.000 |
| Relative permittivity (real part)      | 38.066   |
| Relative permittivity (imaginary part) | 14.330   |
| Conductivity (S/m)                     | 1.769    |

##### C. SAR Surface and Volume

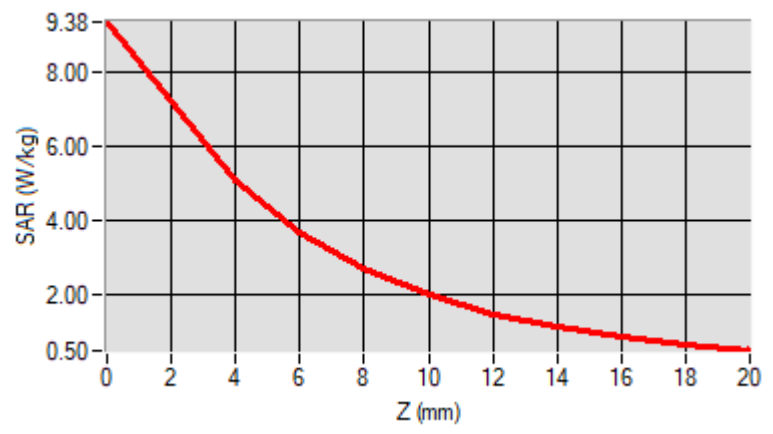


##### D. SAR 1g & 10g

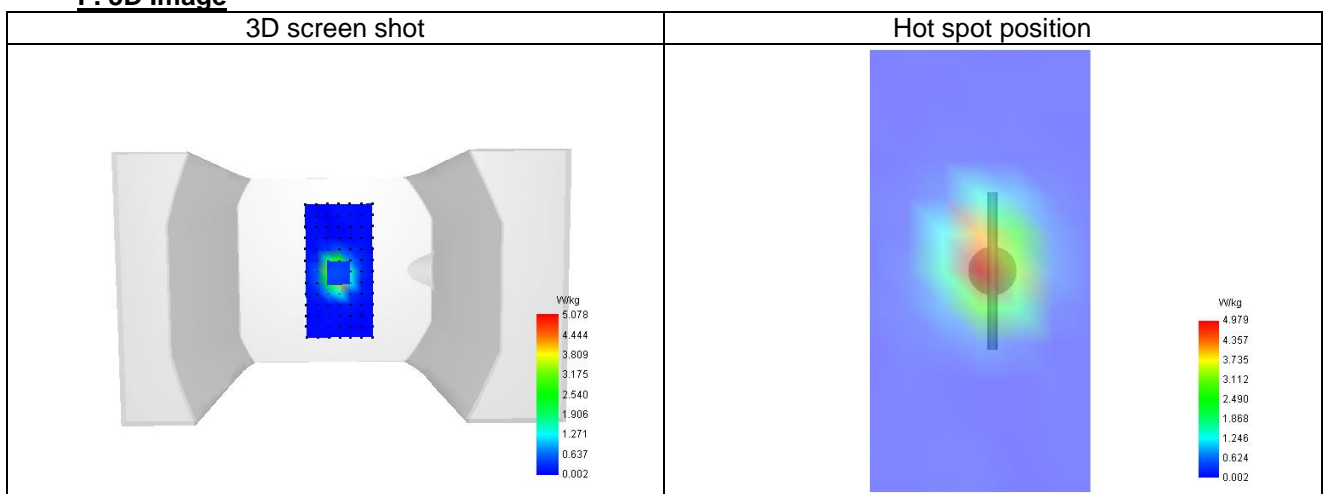
|   |          |
|---|----------|
| SAR 10g (W/Kg)  | 6.361    |
| SAR 1g (W/Kg)   | 14.281   |
| Variation (%)   | -2.282   |
| Horizontal validation criteria: minimum distance (mm) | 0.000000 |
| Vertical validation criteria: SAR ratio M2/M1 (%)     | 0.000000 |

##### E. Z Axis Scan

|            |       |       |       |       |       |       |       |       |       |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Z (mm)     | 0.00  | 4.00  | 6.00  | 8.00  | 10.00 | 12.00 | 14.00 | 16.00 | 18.00 |
| SAR (W/Kg) | 9.380 | 5.078 | 3.712 | 2.709 | 2.001 | 1.499 | 1.138 | 0.871 | 0.667 |



### F. 3D Image



**System check at 5800 MHz**  
Date of measurement: 6/9/2024

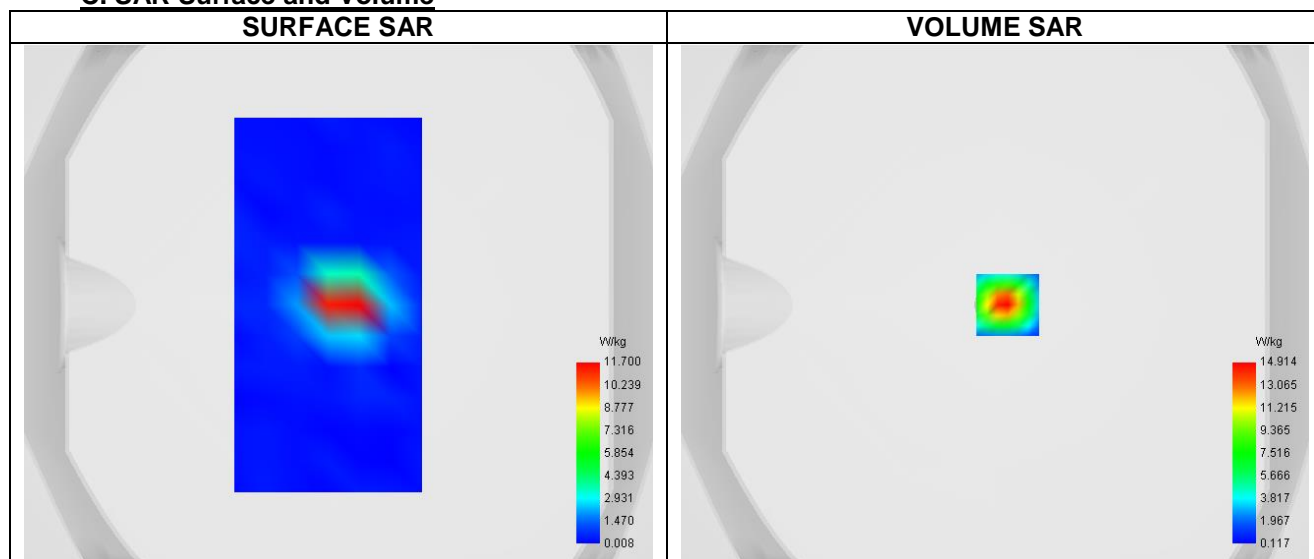
### A. Experimental conditions.

|                 |                               |
|-----------------|-------------------------------|
| Probe           | SN 26/23 EPGO420              |
| ConvF           | 1.05                          |
| Area Scan       | surf_sam_plan.txt             |
| Zoom Scan       | 7x7x12,dx=4mm dy=4mm dz=2.0mm |
| Phantom         | Validation plane              |
| Device Position | Dipole                        |
| Band            | CW5800                        |
| Signal          | CW                            |

### B. Permittivity

|  |          |
|--|----------|
| Frequency (MHz)                        | 5800.000 |
| Relative permittivity (real part)      | 35.695   |
| Relative permittivity (imaginary part) | 18.620   |
| Conductivity (S/m)                     | 5.382    |

### C. SAR Surface and Volume



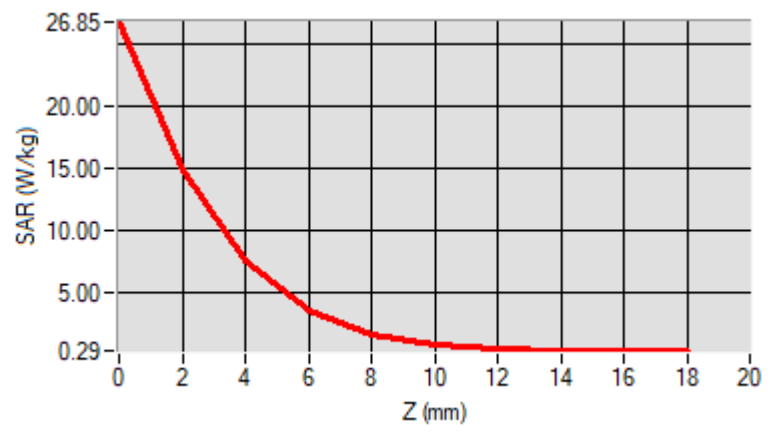
Maximum location: X=5.00, Y=0.00 ; SAR Peak: 28.22 W/kg

### D. SAR 1g & 10g

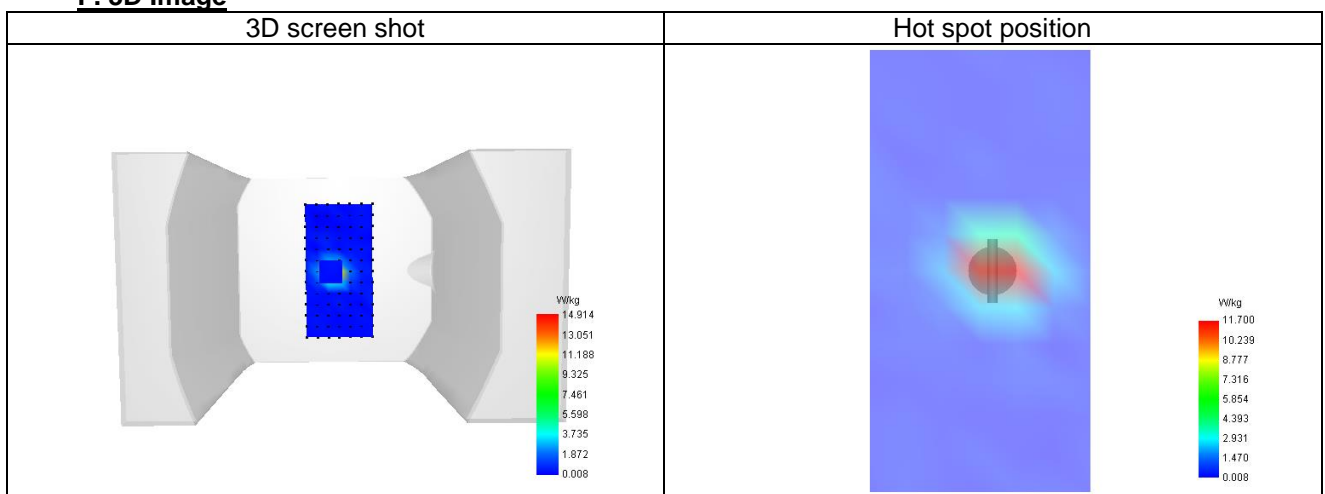
|   |          |
|---|----------|
| SAR 10g (W/Kg)  | 8.117    |
| SAR 1g (W/Kg)   | 19.298   |
| Variation (%)   | 2.509    |
| Horizontal validation criteria: minimum distance (mm) | 0.000000 |
| Vertical validation criteria: SAR ratio M2/M1 (%)     | 0.000000 |

### E. Z Axis Scan

|            |        |        |       |       |       |       |       |       |       |
|------------|--------|--------|-------|-------|-------|-------|-------|-------|-------|
| Z (mm)     | 0.00   | 2.00   | 4.00  | 6.00  | 8.00  | 10.00 | 12.00 | 14.00 | 16.00 |
| SAR (W/Kg) | 26.852 | 14.914 | 7.581 | 3.559 | 1.627 | 0.770 | 0.423 | 0.303 | 0.288 |



### F. 3D Image



TEST  
TO  
OVER  
t See



## 15.2 SAR Test Graph Results

### Plot 1

Date of measurement: 6/9/2024

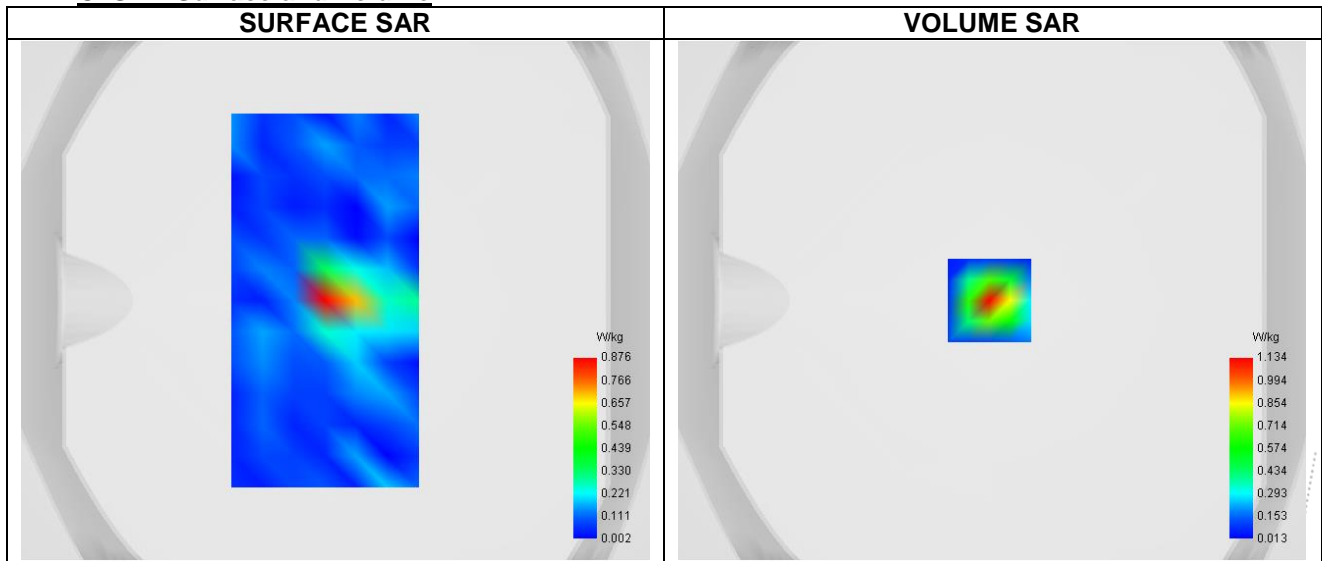
#### A. Experimental conditions.

|                 |                              |
|-----------------|------------------------------|
| Probe           | SN 26/23 EPGO420             |
| ConvF           | 1.11                         |
| Area Scan       | surf_sam_plan.txt            |
| Zoom Scan       | 5x5x7,dx=8mm dy=8mm dz=5.0mm |
| Phantom         | Validation plane             |
| Device Position | Body                         |
| Band            | ISM                          |
| Signal          | IEEE 802.11 b                |

#### B. Permittivity

|  |          |
|--|----------|
| Frequency (MHz)                        | 2412.000 |
| Relative permittivity (real part)      | 38.066   |
| Relative permittivity (imaginary part) | 13.182   |
| Conductivity (S/m)                     | 1.769    |

#### C. SAR Surface and Volume



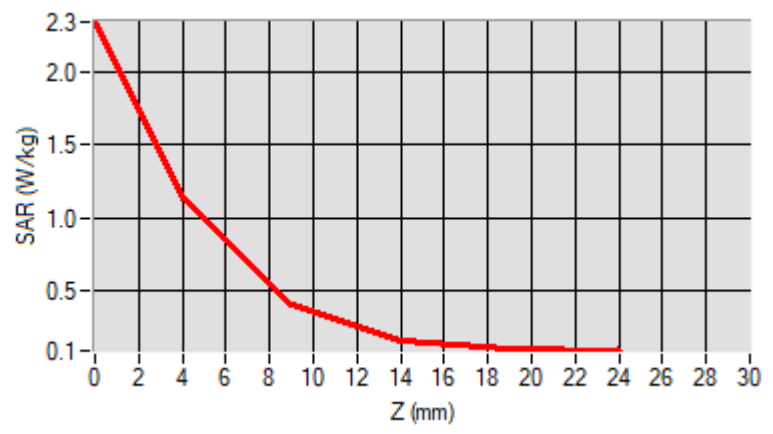
Maximum location: X=-1.00, Y=0.00 ; SAR Peak: 2.35 W/kg

#### D. SAR 1g & 10g

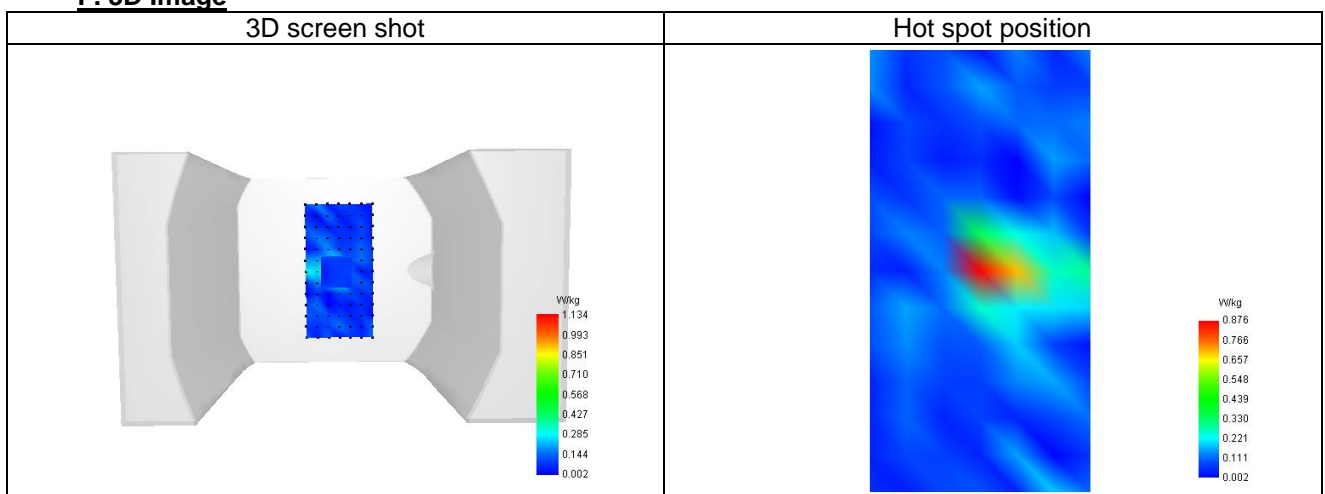
|   |          |
|---|----------|
| SAR 10g (W/Kg)  | 0.382    |
| SAR 1g (W/Kg)   | 0.979    |
| Variation (%)   | -0.750   |
| Horizontal validation criteria: minimum distance (mm) | 0.000000 |
| Vertical validation criteria: SAR ratio M2/M1 (%)     | 0.000000 |

#### E. Z Axis Scan

|            |       |       |       |       |       |
|------------|-------|-------|-------|-------|-------|
| Z (mm)     | 0.00  | 4.00  | 9.00  | 14.00 | 19.00 |
| SAR (W/Kg) | 2.347 | 1.134 | 0.405 | 0.152 | 0.089 |



### F. 3D Image



CO., LTD

**Plot 2**

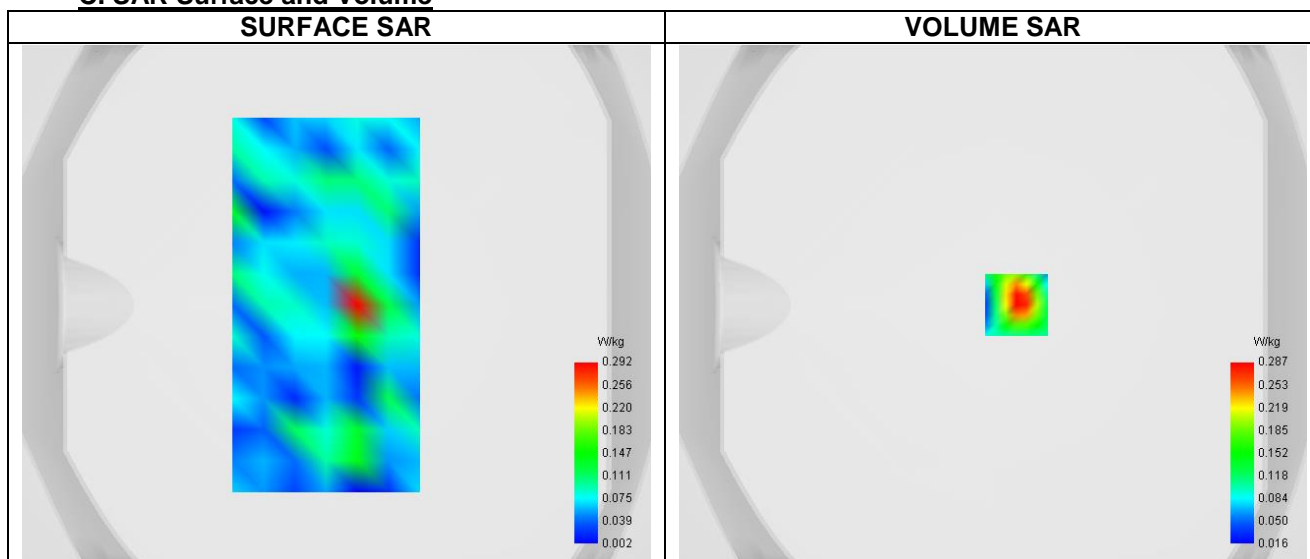
Date of measurement: 6/9/2024

**A. Experimental conditions.**

|                 |                              |
|-----------------|------------------------------|
| Probe           | SN 26/23 EPGO420             |
| ConvF           | 1.11                         |
| Area Scan       | surf_sam_plan.txt            |
| Zoom Scan       | 5x5x7,dx=8mm dy=8mm dz=5.0mm |
| Phantom         | Validation plane             |
| Device Position | Body                         |
| Band            | ISM                          |
| Signal          | IEEE 802.11 b                |

**B. Permittivity**

|  |          |
|--|----------|
| Frequency (MHz)                        | 2412.000 |
| Relative permittivity (real part)      | 38.066   |
| Relative permittivity (imaginary part) | 13.207   |
| Conductivity (S/m)                     | 1.769    |

**C. SAR Surface and Volume**


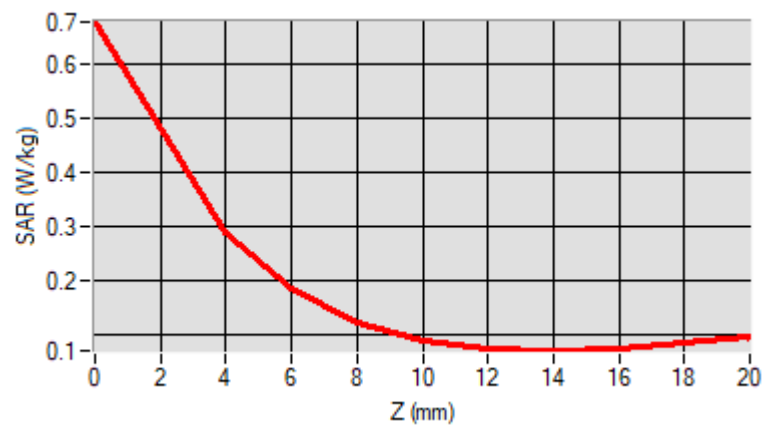
Maximum location: X=9.00, Y=0.00 ; SAR Peak: 0.73 W/kg

**D. SAR 1g & 10g**

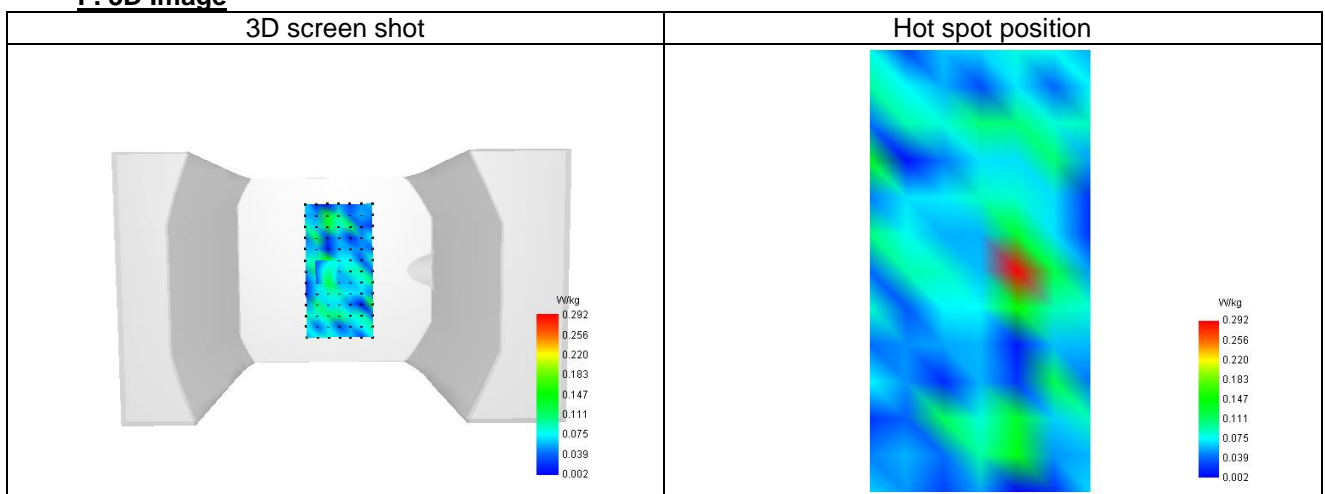
|   |          |
|---|----------|
| SAR 10g (W/Kg)  | 0.118    |
| SAR 1g (W/Kg)   | 0.281    |
| Variation (%)   | 2.350    |
| Horizontal validation criteria: minimum distance (mm) | 0.000000 |
| Vertical validation criteria: SAR ratio M2/M1 (%)     | 0.000000 |

**E. Z Axis Scan**

|            |       |       |       |       |       |       |       |       |       |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Z (mm)     | 0.00  | 4.00  | 6.00  | 8.00  | 10.00 | 12.00 | 14.00 | 16.00 | 18.00 |
| SAR (W/Kg) | 0.678 | 0.287 | 0.184 | 0.122 | 0.089 | 0.074 | 0.070 | 0.074 | 0.084 |



### F. 3D Image



BCTC  
BC  
APPR  
Report

**Plot 3**

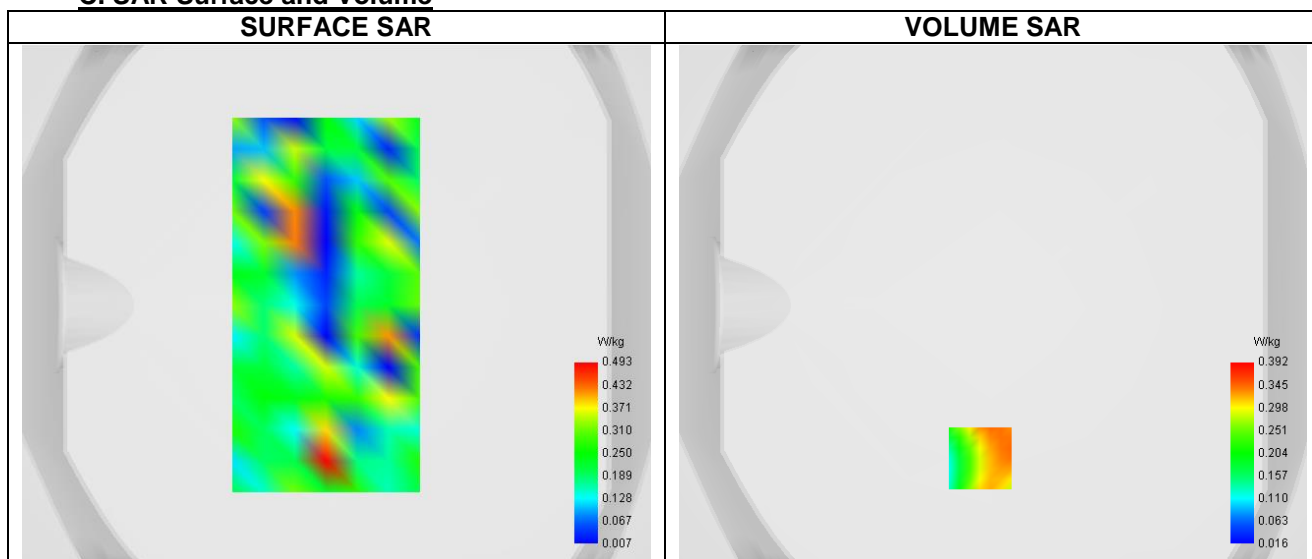
Date of measurement: 6/9/2024

**A. Experimental conditions.**

|                 |                               |
|-----------------|-------------------------------|
| Probe           | SN 26/23 EPGO420              |
| ConvF           | 1.15                          |
| Area Scan       | surf_sam_plan.txt             |
| Zoom Scan       | 7x7x12,dx=4mm dy=4mm dz=2.0mm |
| Phantom         | Validation plane              |
| Device Position | Body                          |
| Band            | 5800                          |
| Signal          | --                            |

**B. Permittivity**

|  |          |
|--|----------|
| Frequency (MHz)                        | 5825.000 |
| Relative permittivity (real part)      | 35.695   |
| Relative permittivity (imaginary part) | 16.355   |
| Conductivity (S/m)                     | 5.382    |

**C. SAR Surface and Volume**


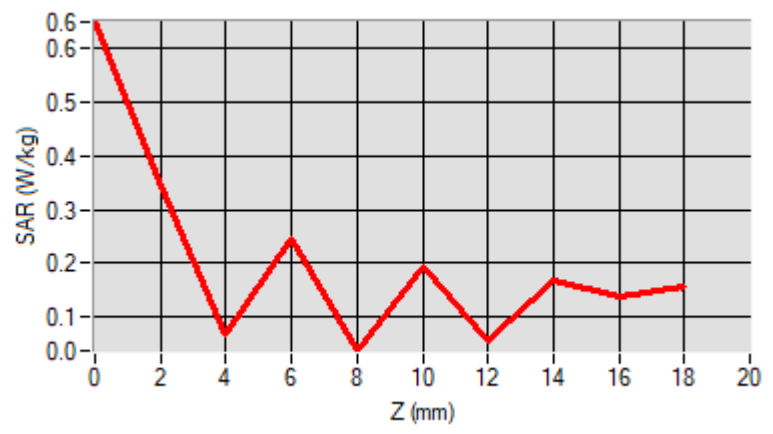
Maximum location: X=-5.00, Y=-59.00 ; SAR Peak: 0.88 W/kg

**D. SAR 1g & 10g**

|   |          |
|---|----------|
| SAR 10g (W/Kg)  | 0.214    |
| SAR 1g (W/Kg)   | 0.397    |
| Variation (%)   | -1.560   |
| Horizontal validation criteria: minimum distance (mm) | 0.000000 |
| Vertical validation criteria: SAR ratio M2/M1 (%)     | 0.000000 |

**E. Z Axis Scan**

|            |       |       |       |       |       |       |       |       |       |
|------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Z (mm)     | 0.00  | 2.00  | 4.00  | 6.00  | 8.00  | 10.00 | 12.00 | 14.00 | 16.00 |
| SAR (W/Kg) | 0.649 | 0.345 | 0.067 | 0.247 | 0.037 | 0.195 | 0.054 | 0.169 | 0.137 |



### F. 3D Image

