

OVER6G CheckList

FCC ID: 2A9LJ-CIAO

1. For frequencies up to 8500 MHz provide spatial peak SAR evaluation based on IEC/IEEE 62209-1528:2020, along with applicable product-specific procedures among KDB Pubs. 648474, 616217, 941225. SAR test data shall account for device tune-up tolerance (that is referred to as "*Reported SAR*" in KDB 447498).

Reply: The frequency range is 5955 MHz to 7125 MHz. The SAR test data had account for device tune-up tolerance. The SAR report number is TCWA24060010403.

2. This policy considers a device compliant for Equipment Authorization purposes, so long as the SAR evaluation of step 1. is within the same SAR limits that have been established for frequencies below 6000 MHz (e.g., 1.6 W/kg for 1-g average SAR). In this case, the SAR evaluations are taken as a conservative compliance demonstration to the MPE power density limits of 47 CFR 1.1310(d)(3).

Reply: The SAR evaluations is less than 1.6 W/kg for 1-g average SAR , so the MPE power density limits had been evaluated, the SAR report number is TCWA24060010403.

3. Documentation is required to support evaluation with MPE limits providing power density data in accordance with the following:

3.1 For the test configurations of step 1 having the highest SAR, evaluate Incident Power Density (IPD), using a suitable near-field probe and a total-field/power-density reconstruction method (e.g., as per methods in [Pfeiffer, 2019])

Reply: the SAR report number is TCWA24060010403, please see page 11.

3.2 Report estimated IPD measurement uncertainty (e.g., per methods of IEC/IEEE 63195-1:2022)

Reply: the SAR report number is TCWA24060010403, please see page 26.

3.3 Power density test data shall account for device tune-up tolerance

Reply: the SAR report number is TCWA24060010403, please see page 23-24.

3.4 If supported by the test system, also report estimated Absorbed (epithelial) Power Density (APD) (e.g., as per method in [Samaras, 2021])

Reply: the SAR report number is TCWA24060010403, please see page 23-24.

4. The process of steps 1 to 4 shall be repeated for at least five channels, at the channel center frequency, selected to cover uniformly the largest frequency ranges used in the device, between 5925 MHz and 8500 MHz, and consistent with KDB Publication 248227 test configuration provisions.

Reply: the SAR report number is TCWA24060010403.

5. For the purpose of SAR test exemption, analyses of simultaneous transmission combinations of RF sources with frequencies from 4 MHz and 8500 MHz (where the lowest frequency is per KDB Publication 447498-D01 SAR evaluation requirements¹⁰), may be performed according to the SPLSR approach (*id.*). Accordingly, no further compliance evaluation is needed for all antenna pairs for which the SPLSR exemption is applicable.

Reply: The SAR evaluations had been tested, please see SAR Simultaneous Transmission Analysis.pdf.

6. For evaluations and test exemption analyses of simultaneous-transmission combinations of different RF sources, the procedure outlined above, for a single source between 6000 and 8500 MHz shall be included in the calculation of total exposure ratio (TER) as in KDB Pub. 447498-D01-Appendix C.

Reply: It had been tested, please see SAR Simultaneous Transmission Analysis.pdf.

7. Any source above 8500 MHz shall be evaluated via incident power density measurements.

Reply: The highest frequency is not up to 8500MHz.