



SAR Test Report

FOR:

Pearl Automation Inc.

Model Name: / Model Number:

RearVision Car Adapter / P120

FCC ID: 2AG6M-P120

Test Report #: SAR-PEARL-040-16001-FCC

Date of Report: 2016-09-26



CETECOM Inc.

411 Dixon Landing Road • Milpitas, CA 95035 • U.S.A.

Phone: + 1 (408) 586 6200 • Fax: + 1 (408) 586 6299 • E-mail: info@cetecom.com • <http://www.cetecom.com>

CETECOM Inc. is a Delaware Corporation with Corporation number: 2905571

TABLE OF CONTENTS

1	Assessment	4
2	Administrative Data	5
2.1	Identification of the Testing Laboratory Issuing the SAR Test Report	5
2.2	Identification of the Client and Manufacturer	5
3	Equipment under Test (EUT)	6
3.1	General Specification of the Equipment under Test	6
3.2	Antenna Information	7
3.3	Technical Specification of Supported Radios.	7
3.4	Identification of the Equipment Under Test (EUT)	8
3.5	Identification of Ancillary Equipment	8
3.6	Maximum SAR values	8
4	Subject of Investigation	9
4.1	The IEEE Standard C95.1 , FCC Exposure Criteria	9
4.2	SAR Limit	9
5	Measurement Procedure.....	10
5.1	General Requirements	10
5.2	Body-worn and Other Configurations	10
5.3	System Check.....	11
5.4	System Check Procedure	11
5.5	Procedure for assessing the peak spatial-average SAR	12
5.6	Determination of the largest peak spatial-average SAR.....	13
5.7	SAR Scaling Using the Tune-Up Scaling Factor	14
6	The Measurement System	15
6.1	Robot system specification.....	15
6.2	Isotropic E-Field Probe for Dosimetric Measurements.....	15
6.3	Data Acquisition Electronics.....	16
6.4	Phantoms	16
6.5	Interpolation and Extrapolation schemes	16
7	Uncertainty Assessment.....	17
8	Test results summary	18
8.1	Measured Conducted Average Output Power	18

8.2	Stand-Alone SAR Evaluation Exclusion.....	20
8.3	Test Positions and Configurations	21
8.4	SAR Results for Body	22
8.5	SAR Measurement Variability	22
8.6	Simultaneous Transmission SAR Evaluation Consideration.....	22
8.7	Dipole verification	23
9	References	24
10	Report History.....	25

Appendices:

Appendix A – Plots

Appendix B – Antenna location, Test Setup Photos

Appendix C – Tissue liquid parameters, Equipment list

1 Assessment

The following device was evaluated against the limits for general population uncontrolled exposure specified in FCC 2.1093 according to measurement procedures specified in FCC regulation as listed in chapter 5, IEEE 1528:2013 and no deviations were ascertained during the course of the tests performed.

Manufacturer	Description	Model #
Pearl Automation Inc.	RearVision Car Adapter	P120

Responsible for Testing Laboratory:

2016-09-26	Compliance	Franz Engert (Compliance Manager)	
Date	Section	Name	Signature

Responsible for the Report:

2016-09-26	Compliance	James Donnellan (Sr. EMC Engineer)	
Date	Section	Name	Signature

The test results of this test report relate exclusively to the test item specified in Section 3.

CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the SAR Test Report

Company Name	CETECOM Inc.
Department	Compliance
Address	411 Dixon Landing Road Milpitas, CA 95035 U.S.A.
Telephone	+1 (408) 586 6200
Fax	+1 (408) 586 6299
Test Lab Manager	Franz Engert
Responsible Project Manager	Ruther Navarro

2.2 Identification of the Client and Manufacturer

	Client	Manufacturer
Company	Pearl Automation Inc.	Dongguan Primax Electronic & Telecommunications Products Co., Ltd
Street Address	100 Enterprise Way, Suite A101	Liu Wu District, Shek Kit Town,
City/Zip Code	Scotts Valley, CA 95066	DongGuan City, Guang Dong,
Country	USA	China

3 Equipment under Test (EUT)

3.1 General Specification of the Equipment under Test

Model	P120	
FCC ID	2AG6M-P120	
Firmware Version	347	
Product Type	Portable /Vehicle	
Prototype/Production	Prototype.	
RF Exposure Environment	General / Uncontrolled	
Dimensions	L 48mm, W 48mm, H 25mm	
Exposure Conditions	Hands, Wrists, Feet and Ankles (Used Near Limbs)	
Radio Module Information	Murata WLAN + Bluetooth Combo Module	Model number: LBEH5DU1BW-777
Supported Radios	<ul style="list-style-type: none">• Bluetooth LE• Bluetooth Version 2.1 + EDR• 2.4G WLAN• 5G WLAN	
Other Radios	N / A	
Power Back-Off Modes	N / A	
Simultaneous Transmission Configurations	BT and 5 GHz Wlan	
Date of Testing	5/11/2016 – 5/20/2016	

3.2 Antenna Information

Antenna	Type	Internal / External	Frequency (MHz)	Manufacturer Stated Max Peak Gain (dBi)
1	PCB Trace Antenna.	Internal	2.4 GHz	1.0
			5 GHz	2.0

3.3 Technical Specification of Supported Radios.

Signal Type	Worst Case For Time Averaged Power Timeslots / Duty Cycle	Type(s) of Uplink Modulation	Band	Uplink Transmit Frequency Range (MHz)	Measured Maximum Conducted Output Power (dBm)	Declared Maximum Output Power (dBm)
802.11 b/g/n	99%	BPSK, QPSK, 16-QAM, 64-QAM	N/A	2400 – 2483.5	18.9	19
Bluetooth 2.1 + EDR	100%	GFSK, $\pi/4$ DQPSK, 8DPSK	N/A	2400 – 2483.5	9.97	14
Bluetooth 4.0	100%	GFSK	N/A	2400 – 2483.5	6.40	10
802.11 a/n	97%	BPSK, QPSK, 16-QAM, 64-QAM	UNII 1	5150 - 5250	12.4	15
			UNII 3	5725 - 5850	13.5	15

NOTE: See section 8.1 for output power information.

3.4 Identification of the Equipment Under Test (EUT)

EUT #	Serial Number	HW Version	SW Version
1	A1A61006E4	DVT1B	347
2	A1A6100754	DVT1B	347

3.5 Identification of Ancillary Equipment

AE #	Type	Manufacturer	Model	Serial Number	Comments
1	MacBook Air	A1465	Apple	C2QQ606&G4FY	Used to setup channel modes prior to test.
2	Battery	-	-	-	Supply power to EUT

3.6 Maximum SAR values

Equipment Class	Exposure Condition	Operating Mode	Duty Cycle	Measured 10g SAR (W/kg)	Maximum Reported 10g SAR ¹ (W/kg)
DTS	Hands, Wrists, Feet and Ankles. ²	80211b	99%	1.98	2.02

NOTES:

1. Measured 10g SAR scaled to manufacturer stated output power upper tolerance limit.
2. Limb Exposure

4 Subject of Investigation

The objective of the measurements done by CETECOM Inc. was the dosimetric assessment of the EUT described in section 3. The tests were performed in configurations for devices operated next to a person's body. The examinations were carried out with the dosimetric assessment system DASY52 described in Section 6.

4.1 The IEEE Standard C95.1 , FCC Exposure Criteria

The FCC limits are set by CFR 47 FCC rule parts 1.1307 and 2.1093. The limits are derived from the recommendations in IEEE C95.1-1999 (ANSI/IEEE C95.1-1999), "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz."

4.2 SAR Limit

In this report the comparison between the exposure limits and the SAR data is made using the spatial peak SAR.

Having in mind a worst case consideration, the SAR limit is valid for uncontrolled environment and portable transmitters. The SAR values have to be averaged over a mass of 1g (SAR_{1g}) with the shape of a cube.

Standard	Exposure Condition	Average SAR (W/kg)	Mass Average (g)
FCC CFR 47 Part 2.1093 (d)(2)	Hands, Wrists, Feet and Ankles	4.0	10

5 Measurement Procedure

The Federal Communications Commission (FCC) requires routine dosimetric assessment of mobile telecom-communications devices, either by laboratory measurement techniques or by computational modeling, prior to equipment authorization or use. The measurement procedure shall be performed according to IEEE 1528:2013. The following KDB publications have additionally been applied:

447498 D01 V06 – General RF Exposure Guidance
865664 D01 V01R04 – SAR measurement 100 MHz to 6 GHz
248227 D01 V02R02 – SAR GUIDANCE FOR IEEE 802.11 (Wi-Fi) TRANSMITTERS

Additionally the following guideline is used:

5.1 General Requirements

SAR evaluation was performed in a laboratory with an environment which avoids influence on SAR measurements by ambient EM sources and any reflection from the environment itself. The ambient temperature was in the range of 18°C to 25°C and 30-70% humidity. Simulating liquid temperature did not deviate more than 2°C throughout SAR evaluation.

5.2 Body-worn and Other Configurations

Test Position

The body-worn configurations shall be tested with the supplied accessories (belt-clips, holsters, etc.) attached to the device in normal use configuration. Devices with a headset output shall be tested with a connected headset.

Test to be Performed

For purpose of determining test requirements, accessories may be divided into two categories: those that do not contain metallic components and those that do. For multiple accessories that do not contain metallic components, the device may be tested only with that accessory which provides the closest spacing to the body. For multiple accessories that contain metallic components, the device must be tested with each accessory that contains a unique metallic component. If multiple accessories share an identical metallic component, only the accessory that provides the closest spacing to the body must be tested. If the manufacturer provides none body-worn accessories a separation distance of 1.5 cm between the back of the device and the flat phantom is recommended. Other separation distances may be used, but they shall not exceed 2.5 cm. In these cases, the device may use body-worn accessories that provide a separation distance greater than that tested for the device provided however that the accessory contains no metallic components.

For devices with retractable antenna the SAR test shall be performed with the antenna fully extended and fully retracted. Other factors that may affect the exposure shall also be tested. For example, optional antennas or optional battery packs which may significantly change the volume, lengths, flip open/closed, etc. of the device, or any other accessories which might have the potential to considerably increase the peak spatial-average SAR value.

5.3 System Check

The purpose of the system check is to verify that the system operates within its specifications. System check is performed within 24 hours prior to compliance testing for each liquid type and frequency band. The system check result is verified to be within $\pm 10\%$ of the reference dipole source as measured during calibration of the dipole.

Phantom Set-Up

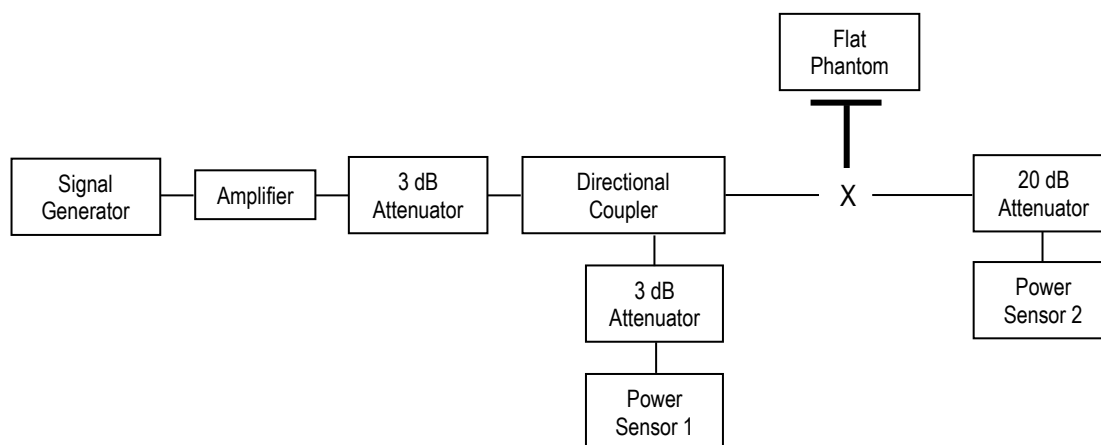
A flat phantom is used with the same tissue-equivalent liquid that will be used during compliance testing. The dipole feed point is placed at the center of the flat phantom and the dipole arms are aligned with the major axis.

Standard Source

A reference dipole source is used to irradiate the phantom. The dipole is placed under the bottom of the phantom and centred with its axis parallel to the longest dimension of the phantom. A low loss spacer is used to establish the correct distance between the top surface of the dipole and the bottom surface of the phantom. For frequencies below 1 GHz, a spacing of 15 mm is used. For frequencies above 1 GHz, a spacing of 10 mm is used. The dipole has a return loss of less than -20 dB at the resonant frequency.

5.4 System Check Procedure

The test set-up is as follows:



1. The cable at the output of the directional coupler is connected to the 20 dB attenuator.
2. The signal generator is adjusted until the desired input power to the dipole is measured at power sensor 2. The forward power of the directional coupler is measured with power sensor 1 and noted for step 4.
3. The cable at the output of the directional coupler is connected to the dipole source.
4. The signal generator is adjusted until power sensor 1 measures the same power as in step 2.
5. A SAR measurement is performed with the dipole source radiating.
6. During the system check test, the power measured by power sensor 1 is monitored to ensure the power does not drift.
7. At the conclusion of the SAR measurement, the SAR result is normalized to a dipole input power of 1 W and compared to the 1 W reference SAR value in the dipole calibration report. The difference between the measured SAR and the reference SAR is verified to be within $\pm 10\%$.

5.5 Procedure for assessing the peak spatial-average SAR

Step 1: Power reference measurement:

Prior to the SAR test, a local SAR measurement should be taken at a user-selected spatial reference point to monitor power variations during testing.

Step 2: Area scan

The measurement procedures for evaluating SAR associated with wireless handsets typically start with a coarse measurement grid in order to determine the approximate location of the local peak SAR values. This is referred to as the "area scan" procedure. The SAR distribution is scanned along the inside surface of typically half of the head of the phantom but at least larger than the areas projected (normal to the phantom's surface) by the handset and antenna. An example grid is given in Figure 4. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (variation less than ± 1 mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient precision. The distance between the measurement points should enable the detection of the location of local maximum with an accuracy of better than half the linear dimension of the tissue cube after interpolation. The approximate locations of the peak SARs should be determined from area scan. Since a given amplitude local peak with steep gradients may produce lower spatial-average SAR than slightly lower amplitude peaks with less steep gradients, it is necessary to evaluate the other peaks as well. However, since the spatial gradients of local SAR peaks are a function of wavelength inside the tissue simulating liquid and incident magnetic field strength, it is not necessary to evaluate peaks that are less than -2dB of the local maximum. Two-dimensional spline algorithms [Press, et al, 1996], [Brishoual, 2001] are typically used to determine the peaks and gradients within the scanned area. If the peak is closer than one-half of the linear dimension of the 1 g or 10 g tissue cube to the scan border, the measurement area should be enlarged if possible, e.g., by tilting the probe or the phantom (see Figure 5).

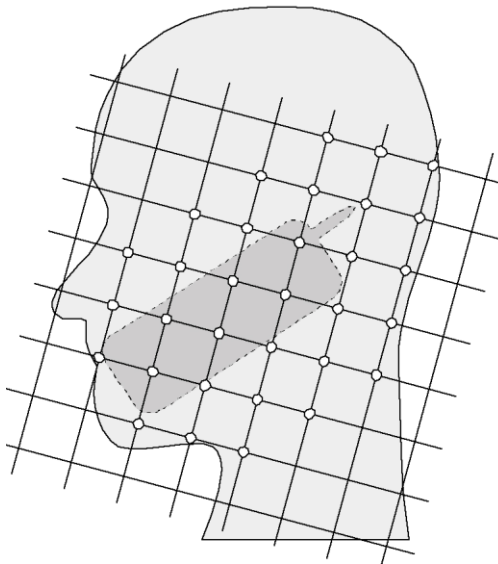


Figure 4 – Example of an area scan including the position of the handset. The scanned area (white dots) should be larger than the area projected by the handset and antenna.

The SPEAG DASY SAR system uses a mechanical sensor detection to find the phantom surface. To decrease test time, the DASY software allows the operator to choose an option where the SAR probe will reuse measurement locations from a previous identical area scan. With this option enabled, the DASY system will not use mechanical sensor detection to find the phantom surface. Locations of each measurement point of the area scan is taken at the same locations as an identical area scan if one is available. Area scans that reused location of measurement points is noted in the result plots under DASY Configuration > Sensor-Surface.

Step 3: Zoom scan

In order to assess the peak spatial SAR values averaged over a 1 g and 10 g cube, fine resolution volume scans, called "zoom scans", are performed at the peak SAR locations determined during the "area scan." The zoom scan volume should have at least 1.5 times the linear dimension of either a 1 g or a 10 g tissue cube for whichever peak spatial-average SAR is being evaluated. The peak local SAR locations that were determined in the area scan (interpolated value) should be on the centerline of the zoom scans. The centerline is the line that is normal to the surface and in the center of the volume scan. If this is not possible, the zoom scan can be shifted but not by more than half the dimension of the 1 g or a 10 g tissue cube.

The maximum spatial-average SAR is determined by a numerical analysis of the SAR values obtained in the volume of the zoom scan, whereby interpolation (between measured points) and extrapolation (between surface and closest measured points) routines should be applied. A 3-D-spline algorithm [Press, et al, 1996], [Kreyszig, 1983], [Brishoual, 2001] can be used for interpolation and a trapezoidal algorithm for the integration (averaging). Scan resolutions of larger than 2 mm can be used provided the uncertainty is evaluated according to E (see E.5).

In some areas of the phantom, such as the jaw and upper head region, the angle of the probe with respect to the line normal to the surface might become large, e.g., at angles larger than $\pm 30^\circ$ (see Figure 5), which may increase the boundary effect to an unacceptable level. In these cases, a change in the orientation of the probe and/or the phantom is recommended during the zoom scan so that the angle between the probe housing tube and the line normal to the surface is significantly reduced ($<30^\circ$).

Step 4: Power reference measurement

The local SAR should be measured at exactly the same location as in Step 1. The absolute value of the measurement drift (the difference between the SAR measured in Step 4 and Step 1) should be recorded in the uncertainty budget. It is recommended that the drift be kept within $\pm 5\%$. If this is not possible, even with repeat testing, additional information may be used to demonstrate the power stability during the test. Power reference measurements can be taken after each zoom scan, if more than one zoom scan is needed. However, the drift should always be referred to the initial state with fully charged battery.

5.6 Determination of the largest peak spatial-average SAR

In order to determine the largest value of the peak spatial-average SAR of a handset, all device positions, configurations and operational modes should be tested for each frequency band according to steps 1 to 3 below.

Step 1: The tests of 6.4 should be conducted at the channel that is closest to the center of the transmit frequency band (f_c) for:

- a) all device positions (cheek and tilt, for both left and right sides of the SAM phantom,
- b) all configurations for each device position in (a), e.g. antenna extended and retracted, and
- c) all operational modes for each device position in (a) and configuration in (b) in each frequency band, e.g. analog and digital.

If more than three frequencies need to be tested, (i.e., $N_c > 3$), then all frequencies, configurations and modes must be tested for all of the above positions.

Step 2: For the condition providing highest spatial peak SAR determined in Step 1 conduct all tests of 6.4 at all other test frequencies, e.g. lowest and highest frequencies. In addition, for all other conditions (device position, configuration and operational mode) where the spatial peak SAR value determined in Step 1 is within 3dB of the applicable SAR limit, it is recommended that all other test frequencies should be tested as well.

Step 3: Examine all data to determine the largest value of the peak spatial-average SAR found in Steps 1 to 2.

5.7 SAR Scaling Using the Tune-Up Scaling Factor

Conducted output power is tested to check if the EUT is transmitting at the maximum power allowed according to the declared maximum power including tune-up power tolerances. When the conducted output power is less than the maximum output power including tolerance, the measured SAR values are scaled up to the maximum output power including tolerance to ensure all production units are within SAR limits.

The tune-up power scaling factor is a multiplicative factor. The tune-up power scaling factor is calculated as:

$$10^{[(\text{Maximum Output Power Including Tolerance} - \text{Measured Conducted Output Power}) / 10]}$$

Where

Maximum Output Power Including Tolerance: dBm

Measured Conducted Output Power: dBm

Example SAR scaling calculation:

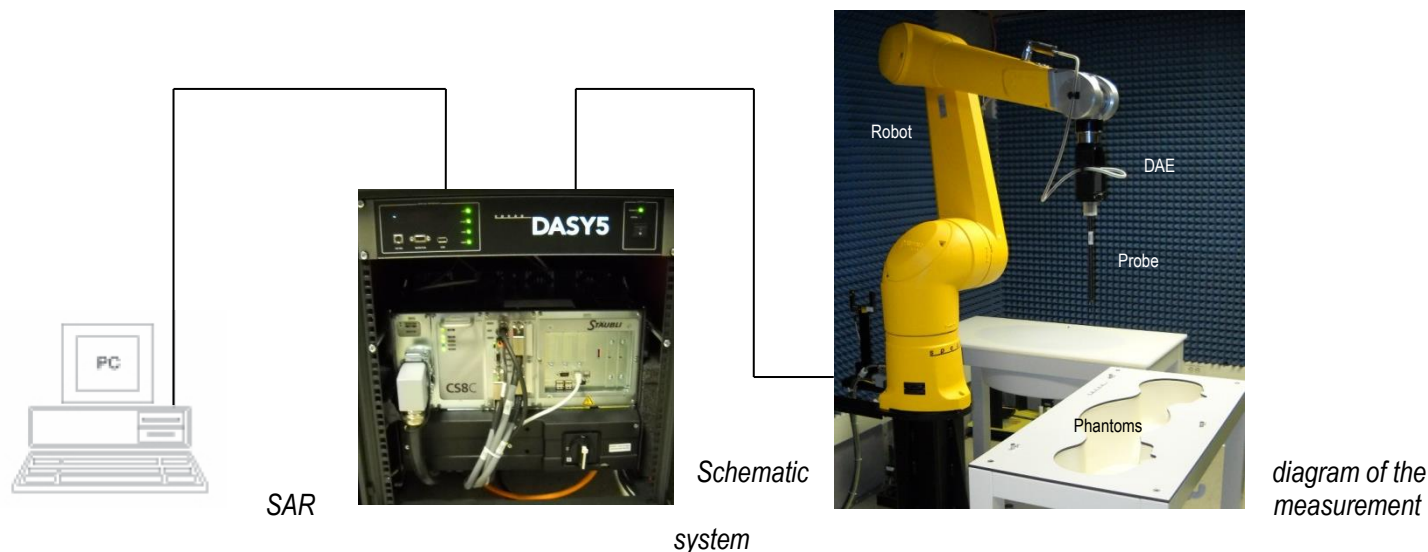
Measured Conducted Output Power (dBm)	Maximum Output Power Including Tolerance (dBm)	Tune-Up Power Scaling Factor	Measured 1g SAR (W/kg)	Scaled/Reported SAR value (W/kg)
32.0	32.5	1.12	1.0	1.12

6 The Measurement System

6.1 Robot system specification

The SAR measurement system being used is the SPEAG DASY52 system, which consists of a Stäubli TX90XL 6-axis robot arm and CS8c controller, SPEAG SAR Probe, Data Acquisition Electronics, and SAM Twin Phantom. The robot is used to articulate the probe to programmed positions inside the phantom to obtain the SAR readings from the EUT.

The system is controlled remotely from a PC, which contains the software to control the robot and data acquisition equipment. The software also displays the data obtained from test scans.



In operation, the system first does an area (2D) scan at a fixed depth within the liquid from the inside wall of the phantom. When the maximum SAR point has been found, the system will then carry out a 3D scan centered at that point to determine volume averaged SAR level.

6.2 Isotropic E-Field Probe for Dosimetric Measurements

The probes are constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probes have built-in shielding against static charges and are contained within a PEEK cylindrical enclosure material at the tip. Probe calibration is described in the probe's calibration certificate.

6.3 Data Acquisition Electronics

The DAE contains a signal amplifier, multiplexer, 16bit A/D converter and control logic. It uses an optical link for communication with the DASY5 system. The DAE has a dynamic range of -100 to 300 mV. It also contains a two step probe touch detector for mechanical surface detection and emergency robot stop.

6.4 Phantoms

The Twin SAM V4.0 Phantom is designed to specifications defined in IEEE 1528. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. The material shell thickness is 2mm +/- 0.2 mm at the flat section and 6mm +/- 0.2 mm at the ear reference point. The relative permattivity is 3.5 +/- 0.5 and the loss tangent is ≤ 0.05 for frequencies ≤ 6 GHz.

Additionally, the Oval Flat ELI V4.0 Phantom is designed to specification defined in IEEE 1528. It enables the dosimetric evaluation of body mounted usage. The material thickness is 2mm +/- 0.2 mm. For frequencies ≤ 6 GHz, the relative permittivity is 4 +/- 1 and the loss tangent is ≤ 0.05 . The bottom plate is 600 x 400 mm elliptical shape with a depth of 190 mm.

6.5 Interpolation and Extrapolation schemes

The interpolation, extrapolation and maximum search routines are all based on the modified Quadratic Shepard'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. The routines construct a once-continuously differentiable function that interpolates the measurement values.

7 Uncertainty Assessment

The uncertainty budget is included as required for the FCC when

The highest measured SAR in a band is $\geq 1.5\text{W/kg}$ for 1g SAR or the equivalent (1.5/1.6) ratio applied to
Extremity and occupational exposure conditions per KDB 865664 section 2.8.2.

SAR measurement uncertainty analysis is therefore not needed in this instance.

8 Test results summary

8.1 Measured Conducted Average Output Power

Measurement uncertainty for conducted measurements is ± 0.5 dB

Upper Power Tolerance Limits are from Manufacturer Specification RF Module Tune-Up Information

Document Revision A September 21, 2016

2.4 GHz WLAN – 802.11 b/g/n HT20

Power measured using a power meter.

Channel	Frequency [MHz]	Average Power [dBm]		
		802.11b	802.11g	802.11n, HT20
1	2412	18.79	14.74	13.67
6	2437	18.91	14.76	13.65
7	2442	18.84	14.71	13.66
11	2462	18.84	14.72	13.64
13	2472	18.25	14.72	13.67
Upper Power Tolerance Limit		19	15	14

Bluetooth v2.1 + EDR

Power measured using a power meter.

Channel	Frequency [MHz]	Average Power [dBm]		
		GFSK	$\pi/4$ DQPSK	8-DPSK
0	2402	9.97	7.36	7.38
39	2441	9.91	7.63	7.65
78	2480	9.88	7.7	7.69
Upper Power Tolerance Limit		14	14	14

Bluetooth v4.0 – Low Energy

Power measured using a power meter..

Channel	Frequency [MHz]	Average Power [dBm]
		GFSK
0	2402	6.29
19	2440	6.33
39	2480	6.4
Upper Power Tolerance Limit		10

5 GHz WLAN – 802.11 a/n HT20

Power measured using a power meter..

Channel	Frequency [MHz]	Average Power [dBm]	
		802.11a	802.11n, HT20
36	5180	12.44	11.5
40	5200	12.3	11.5
44	5220	12.3	11.44
48	5240	12.38	11.43
149	5745	13.47	12.55
153	5765	13.54	12.62
157	5785	13.5	12.6
161	5805	13.45	12.6
165	5825	13.49	12.56
Upper Power Tolerance Limit		15	14

5 GHz WLAN – 802.11 n HT40

Power measured using a power meter.

Channel	Frequency [MHz]	Average Power [dBm]
		802.11n, HT40
38	5190	11.59
46	5230	11.53
151	5755	12.77
159	5795	12.69
Upper Power Tolerance Limit		14

8.2 Stand-Alone SAR Evaluation Exclusion

Antenna	Operation Mode	SAR Evaluation Exclusion Reason
Bluetooth	$\pi/4$ DQPSK 8DPSK	<p>According to KDB 447498, SAR evaluation can be excluded if the following equation is satisfied:</p> $[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ <p>BT BDR SAR measurements were done. With BT EDR the maximum average measured power was equal or less than BDR.</p>

8.3 Test Positions and Configurations

Exposure Condition	Distance	Position	Positioning Photo (Appendix B)
Body SAR	0 mm	Top	Photo 2
Body SAR	0 mm	Front	Photo 3
Body SAR	0 mm	Right side	Photo 4
Body SAR	0 mm	Left side	Photo 5

FCC only requires high and low channels be evaluated when the SAR value on the middle channel is less than 3 dB below the limit.

Measured SAR values are scaled up to the manufacturer's stated output power. These SAR values are the reported SAR values as described in FCC KDB 447498.

Configurations with multiple SAR values have at least one peak SAR within 2 dB of the primary peak.

8.4 SAR Results for Body

Band	Operation Mode	Ch #	Freq.	Position / Distance mm	Measured SAR	Tune Up Power Scaling Factor ¹	Power Drift	Reported SAR	Results (Appendix A)
			(MHz)		1g (W/kg)		(dB)	10g (W/kg)	
UNII-1	80211.a	48	5240	Front / 0mm	0.36	1.83	-0.20	0.66	Plot 1
UNII-1	80211.a	48	5240	Bottom / 0mm	0.308	1.83	0.08	0.56	Plot 2
UNII-1	80211.a	48	5240	Top / 0mm	0.097	1.83	0.02	0.18	Plot 3
UNII-1	80211.a	48	5240	Left Edge / 0mm	0.096	1.83	0.20	0.18	Plot 4
UNII-1	80211.a	48	5240	Right Edge / 0mm	0.120	1.83	0.19	0.22	Plot 5
UNII-3	80211.a	157	5785	Front / 0mm	0.484	1.40	0.01	0.68	Plot 6
UNII-3	80211.a	157	5785	Bottom / 0mm	0.113	1.40	-0.13	0.16	Plot 7
UNII-3	80211.a	157	5785	Top / 0mm	0.126	1.40	0.18	0.18	Plot 8
UNII-3	80211.a	157	5785	Left Edge / 0mm	0.071	1.40	0.07	0.10	Plot 9
UNII-3	80211.a	157	5785	Right Edge / 0mm	0.059	1.40	0.13	0.08	Plot 10
2.4 GHz	80211.b	6	2437	Front / 0mm	1.98	1.02	0.03	2.02	Plot 11
2.4 GHz	80211.b	6	2437	Bottom / 0mm	0.779	1.02	0.04	0.80	Plot 12
2.4 GHz	80211.b	6	2437	Top / 0mm	1.11	1.02	-0.03	1.13	Plot 13
2.4 GHz	80211.b	6	2437	Left Edge / 0mm	0.375	1.02	0.05	0.38	Plot 14
2.4 GHz	80211.b	6	2437	Right Edge / 0mm	0.234	1.02	0.37	0.24	Plot 15
2.4 GHz	80211.g	6	2437	Front / 0mm	0.701	1.06	-0.11	0.72	Plot 16
2.4 GHz	80211.n	6	2437	Front / 0mm	0.54	1.08	-0.03	0.55	Plot 17
2.4 GHz	BT	39	2441	Front / 0mm	0.141	2.56	-0.16	0.36	Plot 18
2.4 GHz	BT-LE	19	2440	Front / 0mm	0.096	2.33	0.11	0.22	Plot 19

Notes: The tune up power scaling factor is a multiplicative factor. See section 5.7 of this report for more details.

8.5 SAR Measurement Variability

SAR measurement variability is assessed when the initial measured 10g SAR is ≥ 2.0 W/kg for extremities. Since this is not the case for this project repeatability analysis is not required

8.6 Simultaneous Transmission SAR Evaluation Consideration

It is theoretically possible for WLAN 5G and BT 2.4 G to transmit concurrently therefore simultaneous Transmission SAR Evaluation is provided below

Position	WLAN 5G	Bluetooth	Simultaneous 10g W/Kg SAR
Front	0.68	0.36	1.04
Bottom	0.56	0.36	0.92
Top	0.18	0.36	0.54
Left Edge	0.18	0.36	0.54
Right Edge	0.22	0.36	0.58

8.7 Dipole verification

Prior to formal testing at each frequency band, system verification was performed in accordance with IEEE 1528. The 1 Watt reference SAR value is taken from the SPEAG dipole calibration report. All of the testing described in this report was performed within 24 hours of the system verification. The following results were obtained:

Date	Liquid Type	Frequency (MHz)	CW input at dipole feed (Watts)	1g SAR (W/kg) ¹	1 Watt reference SAR value (W/kg)	Difference reference SAR value to normalized SAR	Results (Appendix A)
03/31/2016	MSL	835	1	9.82	9.72	1.03%	Plot 22
03/31/2016	MSL	1900	1	37.9	40.4	-6.19%	Plot 23
04/04/2016	MSL	835	1	9.53	9.72	-1.95%	Plot 24
04/05/2016	MSL	1750	1	35.1	37.64	-6.75%	Plot 25
04/04/2016	MSL	1900	1	38.00	40.40	-6.19%	Plot 26
04/01/2016	MSL	1900	1	37.90	40.40	-6.19%	Plot 27

9 References

1. [IEEE 1999] IEEE Std C95.1-1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz, Inst. of Electrical and Electronics Engineers, Inc., December 1998.
2. [IEEE 2013] 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. Inst. of Electrical and Electronics Engineers, Inc., June 2013.
3. [NIST 1994] NIST: Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results, Technical Note 1297 (TN1297), United States Department of Commerce Technology Administration, National Institute of Standards and Technology, September 1994.
4. [FCC 20XX] Various FCC KDB Publications,
< <http://transition.fcc.gov/oet/ea/eameasurements.html#sar> >

10 Report History

Date	Report Name –	Changes to Report	Report prepared by
2016/09/26	SAR-PEARL-040-16001-FCC	Initial Release	James Donnellan