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TEST REPORT

Report No.: CHTEW19120198

Report verificaiton:

Project No.....: SHT1912016906EW

FCC ID.....: 2AVFS-GEO10

Applicant's name.....: Geotechvision Enterprises Limited

Manufacturer...... DBETTER INTERNATIONAL LIMITED

Tsim Sha Tsui, Kowloon

Test item description: Tablet

Trade Mark Geo

Model/Type reference...... GEO10

Listed Model(s) Geo10X

Standard FCC 47 CFR Part2.1093

IEEE Std C95.1, 1999 Edition

IEEE 1528: 2013

Date of receipt of test sample....... Dec. 12, 2019

Date of testing...... Dec. 13, 2019- Dec. 25, 2019

Date of issue...... Dec. 26, 2019

Result.....: PASS

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The test report merely correspond to the test sample.

Report No: CHTEW19120198 Page: 2 of 33 Issued: 2019-12-26

Contents

<u>1.</u>	Test Standards and Report version	3
1.1.	Test Standards	3
1.2.	Report version	3
<u>2.</u>	Summary	4
2.1.	Client Information	4
2.2.	Product Description	4
<u>3.</u>	Test Environment	6
3.1.	Testing Laboratory Information	6
3.2.	Environmental conditions	6
<u>4.</u>	Equipments Used during the Test	
<u>5.</u>	Measurement Uncertainty	8
<u>6.</u>	SAR Measurements System Configuration	9
6.1.	SAR Measurement Set-up	9
6.2.	DASY5 E-field Probe System	10
6.3.	Phantoms	11
6.4.	Device Holder	11
<u>7.</u>	SAR Test Procedure	12
7.1.	Scanning Procedure	12
7.2.	Data Storage and Evaluation	14
<u>8.</u>	Dielectric Property Measurements & System Check	16
8.1.	Tissue Dielectric Parameters	16
8.2.	System Check	18
<u>9.</u>	SAR Exposure Limits	23
<u>10.</u>	Conducted Power Measurement Results	24
10.1.	WiFi	24
10.2.	Bluetooth	25
<u>11.</u>	Maximum Tune-up Limit	26
<u>12.</u>	RF Exposure Conditions (Test Configurations)	28
12.1.	Antenna Location	28
12.2.	Standalone SAR test exclusion considerations	29
12.3.	Required Test Configurations	30
<u>13.</u>	Measured and Reported SAR Results	31
<u>14.</u>	TestSetup Photos	33
<u>15.</u>	External and Internal Photos of the EUT	33

Report No: CHTEW19120198 Page: 3 of 33 Issued: 2019-12-26

1. Test Standards and Report version

1.1. Test Standards

The tests were performed according to following standards:

FCC 47 Part 2.1093: Radiofrequency radiation exposure evaluation: portable devices.

<u>IEEE Std C95.1, 1999 Edition:</u> IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz

<u>IEEE Std 1528™-2013:</u> IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques.

FCC published RF exposure KDB procedures:

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

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

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

248227 D01 802 11 Wi-Fi SAR v02r02: SAR Measurement Proceduresfor802.11 a/b/g Transmitters KDB 616217 D04 SAR for laptop and tablets v01r02: SAR Evaluation Requirements for Laptop, Notebook, Netbook and Tablet Computers

TCB workshop April, 2019; Page 19, Tissue Simulating Liquids (TSL)

1.2. Report version

Revision No.	Date of issue	Description
N/A	2019-12-26	Original

Report No: CHTEW19120198 Page: 4 of 33 Issued: 2019-12-26

2. **Summary**

2.1. Client Information

Applicant:	Geotechvision Enterprises Limited
Address:	44 Cowper Drive, Kingston 20, Jamaica W.I. JMK0020
Manufacturer:	DBETTER INTERNATIONAL LIMITED
Address:	Room803 6F., Chevalier House, 45-51 Chatham Road South, Tsim Sha Tsui, Kowloon

2.2. Product Description

Name of EUT:	Tablet				
Trade Mark:	Geo				
Model No.:	GEO10				
Listed Model(s):	Geo10X				
Power supply:	DC 3.7V				
Device Category:	Portable				
Product stage:	Production unit				
RF Exposure Environment:	General Population/Uncontrolled				
Hardware version:	PC62_H_IPD				
Software version:	andriid version 9				
Device Dimension:	Overall (Length x Width x Thickness):265 x 168 x 9mm				
Maximum SAR Value					
Separation Distance:	0mm				
Max Report SAR Value(1g):	0.346 W/kg				
WiFi 2.4G					
Operating Mode:	802.11b 802.11g 802.11n(HT20) 802.11n(HT40)				
Modulation Type:	802.11b: DSSS				
Modulation Type.	802.11g/802.11n(HT20)/802.11n(HT40): OFDM				
Operation Frequency:	802.11b/802.11g/802.11n(HT20): 2412MHz~2462MHz				
Operation Frequency.	802.11n(HT40): 2422MHz~2452MHz				
Channel Number:	802.11b/802.11g/802.11n(HT20): 11				
Chaine Number.	802.11n(HT40): 7				
Antenna Type:	FPCB				

Report No: CHTEW19120198 Page: 5 of 33 Issued: 2019-12-26

WiFi 5G				
Operation Band:	U-NII-1 U-NII-3			
Operating Mode:	802.11a 802.11n(HT20) 802.11n(HT40) 802.11ac(VHT20) 802.11ac(VHT40) 802.11ac(VHT80)			
Modulation Type:	BPSK, QPSK, 16QAM, 64QAM			
Operation Frequency:	U-NII-1: 5150MHz~5250MHz U-NII-3: 5725MHz~5850MHz			
Antenna Type: FPCB				
Bluetooth				
Version:	BT4.0+EDR			
Operating Mode:	GFSK π/4DQPSK 8DPSK			
Operation Frequency:	2402MHz~2480MHz			
Channel Number:	79			
Antenna Type:	FPCB			
Bluetooth				
Version:	BT4.0+BLE			
Operating Mode:	GFSK			
Operation Frequency:	2402MHz~2480MHz			
Channel Number:	40			
Antenna Type:	FPCB			
Remark: The EUT battery must be t	iully charged and checked periodically during the test to ascertain uniform power.			

Report No: CHTEW19120198 Page: 6 of 33 Issued: 2019-12-26

3. Test Environment

3.1. Testing Laboratory Information

Laboratory Name	Shenzhen Huatongwei International Inspection Co., Ltd.					
Laboratory Location	1/F, Bldg 3, Hongfa Hi-tech Industrial Park, Genyu Road, Tianliao, Gongming, Shenzhen, China					
	Туре	Accreditation Number				
	CNAS	L1225				
Qualifications	A2LA	3902.01				
	FCC	762235				
	Canada	5377A				

3.2. Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

Ambient temperature	18 °C to 25 °C
Ambient humidity	30%RH to 70%RH
Air Pressure	950-1050mbar

Report No: CHTEW19120198 Page: 7 of 33 Issued: 2019-12-26

4. Equipments Used during the Test

Used	Test Equipment	Manufacturer	Model No.	Serial No.	Cal. date (YY-MM-DD)	Due date (YY-MM-DD)
•	Data Acquisition Electronics DAEx	SPEAG	DAE4	1549	2019/03/19	2020/03/18
•	E-field Probe	SPEAG	EX3DV4	7494	2019/03/25	2020/03/24
0	Universal Radio Communication Tester	R&S	CMW500	137681	2019/06/27	2020/06/26
● Ti	ssue-equivalent liquids Va	llidation				
•	Dielectric Assessment Kit	SPEAG	DAK-3.5	1267	N/A	N/A
0	Dielectric Assessment Kit	SPEAG	DAK-12	1130	N/A	N/A
•	Network analyzer	Keysight	E5071C	MY46733048	2019/10/19	2020/10/18
• S	ystem Validation					
0	System Validation Antenna	SPEAG	CLA-150	4024	2018/02/21	2021/02/20
0	System Validation Dipole	SPEAG	D450V3	1102	2018/02/23	2021/02/22
0	System Validation Dipole	SPEAG	D750V3	1180	2018/02/07	2021/02/06
0	System Validation Dipole	SPEAG	D835V2	4d238	2018/02/19	2021/02/18
0	System Validation Dipole	SPEAG	D1750V2	1164	2018/02/06	2021/02/05
0	System Validation Dipole	SPEAG	D1900V2	5d226	2018/02/22	2021/02/21
•	System Validation Dipole	SPEAG	D2450V2	1009	2018/02/05	2021/02/04
0	System Validation Dipole	SPEAG	D2600V2	1150	2018/02/05	2021/02/04
•	System Validation Dipole	SPEAG	D5GHzV2	1273	2018/02/21	2021/02/20
•	Signal Generator	R&S	SMB100A	114360	2019/08/15	2020/08/14
•	Power Viewer for Windows	R&S	N/A	N/A	N/A	N/A
•	Power sensor	R&S	NRP18A	101010	2019/08/15	2020/08/14
•	Power sensor	R&S	NRP18A	101011	2019/08/15	2020/08/14
•	Power Amplifier	BONN	BLWA 0160-2M	1811887	2019/11/14	2020/11/13
•	Dual Directional Coupler	Mini-Circuits	ZHDC-10-62-S+	F975001814	2019/11/14	2020/11/13
•	Attenuator	Mini-Circuits	VAT-3W2+	1819	2019/11/14	2020/11/13
•	Attenuator	Mini-Circuits	VAT-10W2+	1741	2019/11/14	2020/11/13

Note:

^{1.} The Probe, Dipole and DAE calibration reference to the Appendix B and C.

^{2.} Referring to KDB865664 D01, the dipole calibration interval can be extended to 3 years with justifcatio. The dipole are also not physically damaged or repaired during the interval.

Report No: CHTEW19120198 Page: 8 of 33 Issued: 2019-12-26

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.

Report No: CHTEW19120198 Page: 9 of 33 Issued: 2019-12-26

6. SAR Measurements System Configuration

6.1. SAR Measurement Set-up

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

A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).

A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronic (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

A unit to operate the optical surface detector which is connected to the EOC.

The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.

The DASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows 2003.

DASY5 software and SEMCAD data evaluation software.

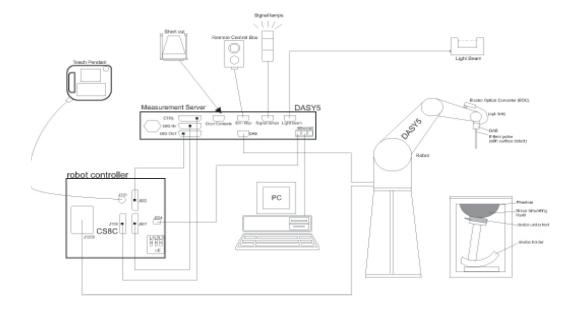
Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.

The generic twin phantom enabling the testing of left-hand and right-hand usage.

The device holder for handheld Mobile Phones.

Tissue simulating liquid mixed according to the given recipes.

System validation dipoles allowing to validate the proper functioning of the system.



Report No: CHTEW19120198 Page: 10 of 33 Issued: 2019-12-26

6.2. DASY5 E-field Probe System

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetric evaluation.

Probe Specification

Construction Symmetrical design with triangular core

Interleaved sensors

Built-in shielding against static charges

PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

Calibration ISO/IEC 17025 calibration service available.

Frequency 4 MHz to 10 GHz;

Linearity: ± 0.2 dB (30 MHz to 6 GHz)

Directivity ± 0.3 dB in HSL (rotation around probe axis)

± 0.5 dB in tissue material (rotation normal to probe axis)

Dynamic Range 10 μ W/g to > 100 W/kg;

Linearity: ± 0.2 dB

Dimensions Overall length: 337 mm (Tip: 20 mm)

Tip diameter: 2.5 mm (Body: 12 mm)

Distance from probe tip to dipole centers: 1.0 mm

Application General dosimetry up to 6 GHz

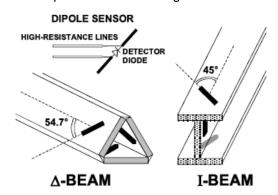
Dosimetry in strong gradient fields Compliance tests of Mobile Phones

Compatibility DASY3, DASY4, DASY52 SAR and higher, EASY4/MRI

Isotropic E-Field Probe

The isotropic E-Field probe has been fully calibrated and assessed for isotropicity, and boundary effect within a controlled environment. Depending on the frequency for which the probe is calibrated the method utilized for calibration will change.

The E-Field probe utilizes a triangular sensor arrangement as detailed in the diagram below:



Report No: CHTEW19120198 Page: 11 of 33 Issued: 2019-12-26

6.3. Phantoms

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI isfully compatible with standard and all known tissuesimulating liquids. ELI has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is compatible with all SPEAG dosimetric probes and dipoles.



ELI Phantom

6.4. Device Holder

The device was placed in the device holder (illustrated below) that is supplied by SPEAG as an integral part of the DASY system.

The DASY device holder is designed to cope with the different positions given in the standard. It has two scales for device rotation (with respect to the body axis) and device inclination (with respect to the line between the ear reference points). The rotation centers for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.



Device holder supplied by SPEAG

Report No: CHTEW19120198 Page: 12 of 33 Issued: 2019-12-26

7. SAR Test Procedure

7.1. Scanning Procedure

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The "reference" and "drift" measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT's output power and should vary max. ± 5%.

The "surface check" measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above \pm 0.1mm). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe (It does not depend on the surface reflectivity or the probe angle to the surface within \pm 30°.)

Area Scan

The Area Scan is used as a fast scan in two dimensions to find the area of high field values before running a detailed measurement around the hot spot.Before starting the area scan a grid spacing of 15 mm x 15 mm is set. During the scan the distance of the probe to the phantom remains unchanged. After finishing area scan, the field maxima within a range of 2 dB will be ascertained.

Zoom Scan

After the maximum interpolated values were calculated between the points in the cube, the SAR was averaged over the spatial volume (1g or 10g) using a 3D-Spline interpolation algorithm. The 3D-spline is composed of three one-dimensional splines with the "Not a knot" condition (in x, y, and z directions). The volume was then integrated with the trapezoidal algorithm.

Spatial Peak Detection

The procedure for spatial peak SAR evaluation has been implemented and can determine values of masses of 1g and 10g, as well as for user-specific masses. The DASY5 system allows evaluations that combine measured data and robot positions, such as:

- maximum search
- extrapolation
- · boundary correction
- peak search for averaged SAR

During a maximum search, global and local maxima searches are automatically performed in 2-D after each Area Scan measurement with at least 6 measurement points. It is based on the evaluation of the local SAR gradient calculated by the Quadratic Shepard's method. The algorithm will find the global maximum and all local maxima within -2 dB of the global maxima for all SAR distributions.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation distance is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation. Extrapolation routines require at least 10 measurement points in 3-D space.

They are used in the Zoom Scan to obtain SAR values between the lowest measurement points and the inner phantom surface. The routine uses the modified Quadratic Shepard's method for extrapolation.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 5mm steps.

Report No: CHTEW19120198 Page: 13 of 33 Issued: 2019-12-26

Table 1: Area and Zoom Scan Resolutions per FCC KDB Publication 865664 D01v04

		•	≤3 GHz	> 3 GHz	
Maximum distance fro (geometric center of p		measurement point rs) to phantom surface	$5 \text{ mm} \pm 1 \text{ mm}$	$\frac{1}{2} \cdot \hat{\delta} \cdot \ln(2) \text{ mm} \pm 0.5 \text{ mm}$	
Maximum probe angle surface normal at the i			30° ± 1°	20° ± 1°	
			\leq 2 GHz: \leq 15 mm 2 – 3 GHz: \leq 12 mm	$3 - 4 \text{ GHz:} \le 12 \text{ mm}$ $4 - 6 \text{ GHz:} \le 10 \text{ mm}$	
Maximum area scan s	patial resol	ution: Δx_{Area} , Δy_{Area}	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.		
Maximum zoom scan	Maximum zoom scan spatial resolution: Δx_{Zoom} , Δy_{Zoom}			$3 - 4 \text{ GHz: } \le 5 \text{ mm}^*$ $4 - 6 \text{ GHz: } \le 4 \text{ mm}^*$	
	uniform	grid: Δz _{Zoom} (n)	≤ 5 mm	$3 - 4 \text{ GHz}: \le 4 \text{ mm}$ $4 - 5 \text{ GHz}: \le 3 \text{ mm}$ $5 - 6 \text{ GHz}: \le 2 \text{ mm}$	
Maximum zoom scan spatial resolution, normal to phantom surface	$\begin{array}{c} \text{graded} \\ \text{grid} \\ \end{array} \begin{array}{c} \Delta z_{Zoom}(1) \text{: between} \\ 1^{\text{st}} \text{ two points closest} \\ \text{to phantom surface} \\ \\ \Delta z_{Zoom}(n > 1) \text{:} \\ \text{between subsequent} \\ \text{points} \end{array}$		≤ 4 mm	$3 - 4 \text{ GHz:} \le 3 \text{ mm}$ $4 - 5 \text{ GHz:} \le 2.5 \text{ mm}$ $5 - 6 \text{ GHz:} \le 2 \text{ mm}$	
			$\leq 1.5 \cdot \Delta z_{Zoom}(n-1) \text{ mm}$		
Minimum zoom scan volume x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm		

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see 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 ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

Report No: CHTEW19120198 Page: 14 of 33 Issued: 2019-12-26

7.2. Data Storage and Evaluation

Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), s together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension ".DA4". The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [W/kg], [mW/cm²], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

Data Evaluation

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters: Sensitivity: Normi, ai0, ai1, ai2

> Conversion factor: ConvFi Diode compression point: Dcpi

Device parameters: Frequency:

Crest factor: cf Conductivity: σ

Media parameters: Density: ρ

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY5 components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics. If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

compensated signal of channel (i = x, y, z)

Ui: input signal of channel (i = x, y, z)

crest factor of exciting field (DASY parameter) cf: dcpi: diode compression point (DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:
$$E-\mathrm{fieldprobes}: \qquad E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

H – field
probes :
$$H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

compensated signal of channel (i = x, y, z) Vi: Normi: sensor sensitivity of channel (i = x, y, z),

[mV/(V/m)2] for E-field Probes

ConvF: sensitivity enhancement in solution

sensor sensitivity factors for H-field probes aij:

f: carrier frequency [GHz]

Ei: electric field strength of channel i in V/m Hi: magnetic field strength of channel i in A/m Report No: CHTEW19120198 Page: 15 of 33 Issued: 2019-12-26

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}$$

The primary field data are used to calculate the derived field units.
$$SAR = E_{tot}^2 \cdot \frac{\sigma}{\rho \cdot 1'000}$$

SAR: local specific absorption rate in W/kg

Etot: total field strength in V/m

conductivity in [mho/m] or [Siemens/m] σ: equivalent tissue density in g/cm3 ρ:

Note that the density is normally set to 1 (or 1.06), to account for actual brain density rather than the density of the simulation liquid.

Report No: CHTEW19120198 Page: 16 of 33 Issued: 2019-12-26

8. Dielectric Property Measurements & System Check

8.1. Tissue Dielectric Parameters

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.

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.

The dielectric constant (ε_r) and conductivity (σ) of typical tissue-equivalent media recipes are expected to be within \pm 5% of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for ε_r and σ may be relaxed to \pm 10%. This is limited to frequencies \leq 3 GHz.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Tissue dielectric parameters for Head and Body									
Target Frequency (MHz)	He	ad	E	Body					
(MHz)	ε _r	σ(S/m)	٤r	σ(S/m)					
2450	39.2	1.80	52.7	1.95					
5200	36.0	4.66	49.0	5.30					
5800	35.3	5.27	48.2	6.00					

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Report No: CHTEW19120198 Page: 17 of 33 Issued: 2019-12-26

Dielectric Property Measurements Results:

Diciocato i roporty medicaremento recours.												
	Dielectric performance of Head tissue simulating liquid											
Frequency	ε _r		σ(S/m)		Delta	Delta		Temp				
(MHz)	Target	Measured	Target	Measured	(ε _r)	(σ)	Limit	(℃)	Date			
2450	39.20	40.22	1.800 1.830		2.60%	1.67%	±5%	22.5	2019/12/23			
5200	36.00	35.60	4.660 4.482		-1.11%	-3.82%	±5%	22.5	2019/12/24			
5800	35.30	34.58	5.270	5.159	-2.04%	-2.11%	±5%	22.5	2019/12/24			

Report No: CHTEW19120198 Page: 18 of 33 Issued: 2019-12-26

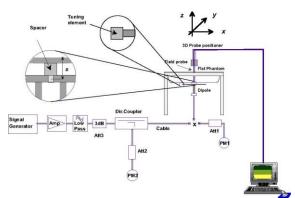
8.2. System Check

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

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥15.0 cm for SAR measurements ≤3 GHz and ≥10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10 mm (above 1 GHz) and 15 mm (below 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.

 For 5 GHz band The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube was chosen for the cube.
- The results are normalized to 1 W input power.



System Performance Check Setup



Photo of Dipole Setup

Report No: CHTEW19120198 Page: 19 of 33 Issued: 2019-12-26

System Check Result:

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

	Head										
Frequency	1g SAR			10g SAR			Delta Del	Delta	Lincia	Temp	
(MHz)	Target 1W	Normalize to 1W	Measured 250mW	Target 1W	Normalize to 1W	Measured 250mW	(1g)	(10g)	Limit	(℃)	Date
2450	51.50	47.20	11.80	24.10	22.28	5.57	-8.35%	-7.55%	±10%	22.5	2019/12/23

	Head												
Frequency	1g SAR			10g SAR			Delta	Delta		Temp			
(MHz)	Target 1W	Normalize to 1W	Measured 100mW	Target 1W	Normalize to 1W	Measured 100mW	(1g)	(10g)	Limit	(℃)	Date		
5200	79.90	74.80	7.48	22.80	21.40	2.14	-6.38%	-6.14%	±10%	22.5	2019/12/24		
5800	79.40	73.10	7.31	22.50	20.90	2.09	-7.93%	-7.11%	±10%	22.5	2019/12/24		

Report No: CHTEW19120198 Page: 20 of 33 Issued: 2019-12-26

Plots of System Performance Check

SystemPerformanceCheck-Head 2450MHz

DUT: D2450V2; Type: D2450V2; Serial: 1009

Date:2019-12-23

Communication System: UID 0, CW (0); Frequency: 2450 MHz; Duty Cycle: 1:1

Medium parameters used (interpolated): f = 2450 MHz; $\sigma = 1.83 \text{ S/m}$; $\epsilon r = 40.217$; $\rho = 1000 \text{ kg/m}$ 3

Phantom section: Flat Section

Ambient Temperature:22.2°; Liquid Temperature:22.0°C;

DASY5 Configuration:

Probe: EX3DV4 - SN7494; ConvF(7.9, 7.9, 7.9) @ 2450 MHz; Calibrated: 3/25/2019

• Sensor-Surface: 1.4mm (Mechanical Surface Detection)

• Electronics: DAE4 Sn1549; Calibrated: 3/19/2019

Phantom: ELI V8.0; Type: QD OVA 004 AA; Serial: 2078

DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

Head/d=10mm,Pin=250mW/Area Scan (41x61x1): Interpolated grid: dx=1.200 mm,

dy=1.200 mm

Maximum value of SAR (interpolated) = 19.8 W/kg

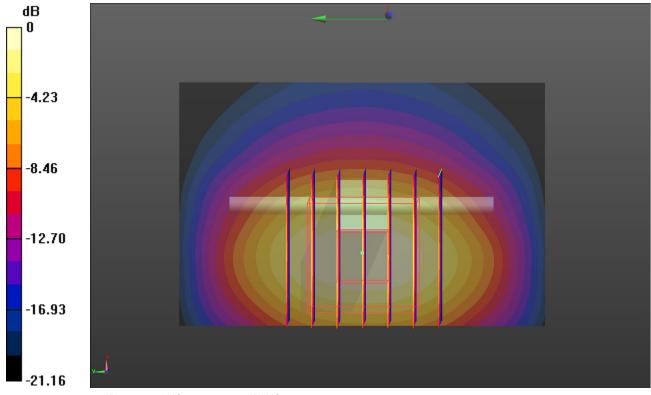
Head/d=10mm,Pin=250mW/Zoom Scan (7x7x7)/Cube 0: Measurement grid: dx=5mm,

dy=5mm, dz=5mm

Reference Value = 70.26 V/m; Power Drift = 0.11 dB

Peak SAR (extrapolated) = 24.1 W/kg

SAR(1 g) = 11.8 W/kg; SAR(10 g) = 5.57 W/kg Maximum value of SAR (measured) = 19.5 W/kg



0 dB = 19.5 W/kg = 12.90 dBW/kg

Report No: CHTEW19120198 Page: 21 of 33 Issued: 2019-12-26

SystemPerformanceCheck-Head 5200MHz

DUT: D5GHzV2; Type: D5GHzV2; Serial: 1273

Date: 2019-12-24

Communication System: UID 0, CW (0); Frequency: 5200 MHz; Duty Cycle: 1:1 Medium parameters used: f = 5200 MHz; $\sigma = 4.49$ S/m; $\epsilon = 35.6$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Ambient Temperature:22.1 °C;Liquid Temperature:21.9 °C;

DASY5 Configuration:

Probe: EX3DV4 - SN7494; ConvF(5.56, 5.56, 5.56) @ 5200 MHz; Calibrated: 3/25/2019

• Sensor-Surface: 1.4mm (Mechanical Surface Detection)

Electronics: DAE4 Sn1549; Calibrated: 3/19/2019

Phantom: ELI V8.0; Type: QD OVA 004 AA; Serial: 2078

DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

Head/d=10mm,pin=100mW/Area Scan (41x41x1): Interpolated grid: dx=1.000 mm, dy=1.000 mm

Maximum value of SAR (interpolated) = 18.9 W/kg

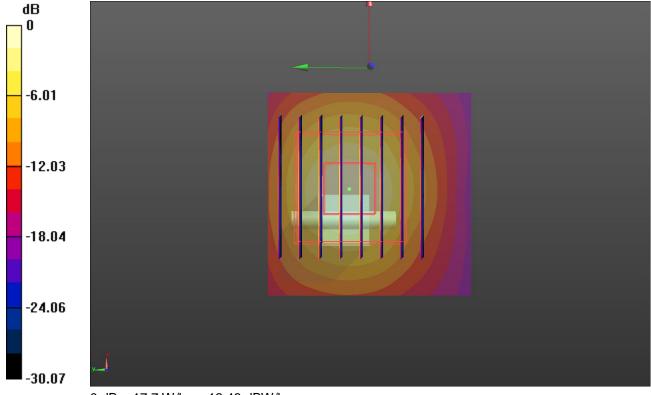
Head/d=10mm,pin=100mW/Zoom Scan (8x8x7)/Cube 0: Measurement grid: dx=4mm,

dy=4mm, dz=1.4mm

Reference Value = 56.27 V/m; Power Drift = -0.28 dB

Peak SAR (extrapolated) = 30.9 W/kg

SAR(1 g) = 7.48 W/kg; SAR(10 g) = 2.14 W/kgMaximum value of SAR (measured) = 17.7 W/kg



0 dB = 17.7 W/kg = 12.48 dBW/kg

Report No: CHTEW19120198 Page: 22 of 33 Issued: 2019-12-26

SystemPerformanceCheck-Head 5800MHz

DUT: D5GHzV2; Type: D5GHzV2; Serial: 1273

Date: 2019-12-24

Communication System: UID 0, CW (0); Frequency: 5800 MHz; Duty Cycle: 1:1 Medium parameters used: f = 5800 MHz; $\sigma = 5.159$ S/m; $\epsilon r = 34.576$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

Ambient Temperature:22.5 °C;Liquid Temperature:22.3 °C;

DASY5 Configuration:

- Probe: EX3DV4 SN7494; ConvF(4.85, 4.85, 4.85) @ 5800 MHz; Calibrated: 3/25/2019
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn1549; Calibrated: 3/19/2019
- Phantom: ELI V8.0; Type: QD OVA 004 AA; Serial: 2078
- DASY52 52.10.2(1495); SEMCAD X 14.6.12(7450)

Head/d=10mm,Pin=100mW/Area Scan (31x31x1): Interpolated grid: dx=1.000 mm,

dy=1.000 mm

Maximum value of SAR (interpolated) = 19.6 W/kg

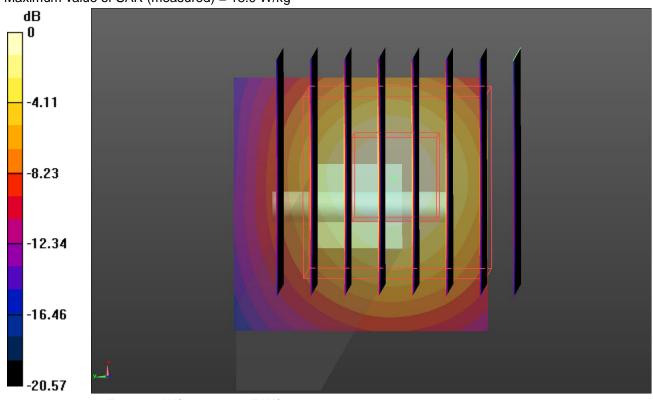
Head/d=10mm,Pin=100mW/Zoom Scan (8x8x8)/Cube 0: Measurement grid: dx=4mm,

dy=4mm, dz=1.4mm

Reference Value = 60.02 V/m; Power Drift = -0.12 dB

Peak SAR (extrapolated) = 34.8 W/kg

SAR(1 g) = 7.31 W/kg; SAR(10 g) = 2.09 W/kg Maximum value of SAR (measured) = 18.0 W/kg



0 dB = 18.0 W/kg = 12.55 dBW/kg

Report No: CHTEW19120198 Page: 23 of 33 Issued: 2019-12-26

9. SAR Exposure Limits

SAR assessments have been made in line with the requirements of FCC 47 CFR § 2.1093.

	Limit (W/kg)						
Type Exposure	General Population / Uncontrolled Exposure Environment	Occupational / Controlled Exposure Environment					
Spatial Average SAR (whole body)	0.08	0.4					
Spatial Peak SAR (1g cube tissue for head and trunk)	1.6	8.0					
Spatial Peak SAR (10g for limb)	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).

Report No: CHTEW19120198 Page: 24 of 33 Issued: 2019-12-26

10. Conducted Power Measurement Results

10.1. WiFi

For 2.4GHz WiFi SAR testing, highest average RF output power channel for the lowest data rate for 802.11b were for SAR evaluation.

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

SAR testing is not required for OFDM mode(s) when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is \leq 1.2 W/kg.

	WIFI 2.4G											
Mode Channel		Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)								
	1	2412	16.86	15.18								
802.11b	6	2437	16.96	15.43								
	11	2462	17.24	15.63								
	1	2412	16.24	14.56								
802.11g	6	2437	16.09	14.33								
	11	2462	16.68	14.94								
	1	2412	16.34	14.48								
802.11n (HT20)	6	2437	16.28	14.36								
(11120)	11	2462	16.79	14.95								
	3	2422	15.51	13.73								
802.11n (HT40)	6	2437	15.47	13.68								
(1140)	9	2452	15.85	13.11								

	WIFI 5G U-NII-1										
Mode	Channel	Frequency (MHz)	Conducted Average Power (dBm)								
	36	5180	16.35								
802.11ac (VHT20)	44	5220	16.38								
(****25)	48	5240	16.15								
	36	5180	16.32								
802.11n (HT20)	44	5220	16.32								
(11120)	48	5240	16.12								
	36	5180	16.50								
802.11a	44	5220	16.53								
	48	5240	16.35								
802.11ac	38	5190	15.70								
(VHT40)	46	5230	15.53								
802.11n	38	5190	15.61								
(HT40)	46	5230	15.56								
802.11ac (VHT80)	42	5210	15.19								

Report No: CHTEW19120198 Page: 25 of 33 Issued: 2019-12-26

		WIFI 5G U-NII-3	
Mode	Channel	Frequency (MHz)	Conducted Average Power (dBm)
	149	5745	15.88
802.11ac (VHT20)	157	5785	14.97
(****25)	165	5825	14.79
	149	5745	16.41
802.11n (HT20)	157	5785	15.30
(11120)	165	5825	14.79
	149	5745	16.70
802.11a	157	5785	15.34
	165	5825	15.31
802.11ac	151	5755	15.00
(VHT40)	159	5795	14.00
802.11n	151	5755	15.26
(HT40)	159	5795	14.10
802.11ac (VHT80)	155	5775	14.55

10.2. Bluetooth

Bluetooth											
Mode	Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Conducted Average Power (dBm)							
	0	2402	5.90	5.85							
GFSK	39	2441	6.09	6.01							
	78	2480	5.62	5.46							
	0	2402	5.32	5.05							
π/4QPSK	39	2441	5.45	5.16							
	78	2480	4.96	4.73							
	0	2402	5.39	5.01							
8DPSK	39	2441	5.60	5.34							
	78	2480	5.01	4.82							
	0	2402	-1.44	-1.46							
GFSK(BLE)	19	2440	-1.00	-1.03							
	39	2480	-1.83	-1.86							

Report No: CHTEW19120198 Page: 26 of 33 Issued: 2019-12-26

11. Maximum Tune-up Limit

	WIFI 2.4G											
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power										
	1	15.50										
802.11b	6	15.50										
	11	16.00										
	1	15.00										
802.11g	6	14.50										
	11	15.00										
	1	14.50										
802.11n(HT20)	6	14.50										
	11	15.00										
	3	14.00										
802.11n(HT40)	6	14.00										
	9	13.50										

	WIFI 5G U-NII-1											
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power										
	36	16.50										
802.11ac(VHT20)	44	16.50										
	48	16.50										
	36	16.50										
802.11n(HT20)	44	16.50										
	48	16.50										
	36	16.50										
802.11a	44	17.00										
	48	16.50										
000 44()/[[T40]	38	16.00										
802.11ac(VHT40)	46	16.00										
900 44 n/UT40\	38	16.00										
802.11n(HT40)	46	16.00										
802.11ac(VHT80)	42	15.50										

Report No: CHTEW19120198 Page: 27 of 33 Issued: 2019-12-26

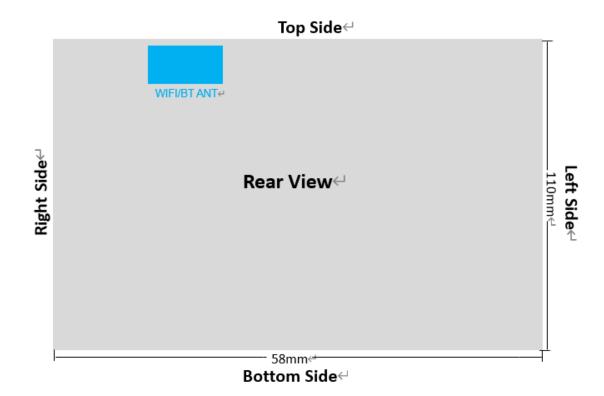
WIFI 5G U-NII-3									
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power							
	149	16.00							
802.11ac(VHT20)	157	15.00							
	165	15.00							
	149	16.50							
802.11n(HT20)	157	15.50							
	165	15.00							
	149	17.00							
802.11a	157	15.50							
	165	15.50							
902 11co(\/UT40\	151	15.00							
802.11ac(VHT40)	159	14.00							
902.44°/UT40)	151	15.50							
802.11n(HT40)	159	14.50							
802.11ac(VHT80)	155	15.00							

	Bluetooth											
Mode	Channel	Maximum Tune-up (dBm) Conducted Average Power										
	0	6.00										
GFSK	39	6.50										
	78	5.50										
	0	5.50										
π/4QPSK	39	5.50										
	78	5.00										
	0	5.50										
8DPSK	39	5.50										
	78	5.00										
	0	-1.00										
GFSK(BLE)	19	-1.00										
	39	-1.50										

Report No: CHTEW19120198 Page: 28 of 33 Issued: 2019-12-26

12. RF Exposure Conditions (Test Configurations)

12.1. Antenna Location



Report No: CHTEW19120198 Page: 29 of 33 Issued: 2019-12-26

12.2. Standalone SAR test exclusion considerations

KDB 447498 with KDB 616217:

a) For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g SAR test exclusion thresholds are determined by the following:

[(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance,

mm)] · [$\sqrt{f(GHz)}$] ≤ 3.0 for 1-g SAR

When the minimum test separation distance is < 5 mm, a distance of 5 mm according is applied to determine SAR test exclusion.

- b) For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:
- 1) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance 50 mm)·(f(MHz)/150)]} mW, for 100 MHz to 1500 MHz
- 2) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance 50 mm)·10]} mW, for > 1500 MHz and ≤6 GHz

Antennas ≤ 50mm to adjacent edges

7 11 11 0 1 1	7 William = Somm to adjacom suges												
Tx Frequency	Frequency	Output Power		separation distances (mm)					Calculated Threshold Value				
Interface	(MHz)	dBm	mW	Rear	Left	Right	Тор	Bottom	Rear	Left	Right	Тор	Bottom
WIFI 2.4G	2462	16.00	39.8	2	165	65	1	145	12.5 MEASURE	> 50 mm	> 50 mm	12.5 MEASURE	> 50 mm
WIFI 5G U- NII-1	5220	17.00	50.1	2	165	65	1	145	22.9 MEASURE	> 50 mm	> 50 mm	22.9 MEASURE	> 50 mm
WIFI 5G U- NII-3	5745	17.00	50.1	2	165	65	1	145	24.0 MEASURE	> 50 mm	> 50 mm	24.0 MEASURE	> 50 mm
Bluetooth	2441	6.50	4.5	2	165	65	1	145	1.4 EXEMPT	> 50 mm	> 50 mm	1.4 EXEMPT	> 50 mm

Antennas > 50mm to adjacent edges

71110111	Anterinas > 30mm to adjacent edges													
Tx	Frequency	Output F	ower	separation distances (mm)						Calculated Threshold Value				
Interface	(MHz)	dBm	mW	Rear	Left	Right	Тор	Bottom	Rear	Left	Right	Тор	Bottom	
WIFI 2.4G	2462	16.00	39.8	2	165	65	1	145	≤ 50mm	1246 mW EXEMPT	246 mW EXEMPT	≤ 50mm	1046 mW EXEMPT	
WIFI 5G U- NII-1	5220	17.00	50.1	2	165	65	1	145	≤ 50mm	1216 mW EXEMPT	216 mW EXEMPT	≤ 50mm	1016 mW EXEMPT	
WIFI 5G U- NII-3	5745	17.00	50.1	2	165	65	1	145	≤ 50mm	1213 mW EXEMPT	213 mW EXEMPT	≤ 50mm	1013 mW EXEMPT	
Bluetooth	2441	6.50	4.5	2	165	65	1	145	≤ 50mm	1246 mW EXEMPT	246 mW EXEMPT	≤ 50mm	1046 mW EXEMPT	

Report No: CHTEW19120198 Page: 30 of 33 Issued: 2019-12-26

12.3. Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 13.2:

Test Configurations	Rear	Left	Right	Тор	Bottom
WIFI 2.4G	Yes	No	No	Yes	No
WIFI 5G U-NII-1	Yes	No	No	Yes	No
WIFI 5G U-NII-3	Yes	No	No	Yes	No
Bluetooth	No	No	No	No	No

Report No: CHTEW19120198 Page: 31 of 33 Issued: 2019-12-26

13. Measured and Reported SAR Results

SAR Test Reduction criteria are as follows:

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

KDB 447498 D01 General RF Exposure Guidance:

Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

- ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
- ≤ 0.6 W/kg or 1.5 W/kg, for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz

KDB 248227 D01 SAR meas for 802.11:

When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 - 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

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

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

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

Report No: CHTEW19120198 Page: 32 of 33 Issued: 2019-12-26

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

	WiFi 2.4G												
Mode	Test Position	Frequency		Conducted Power	Tune- up limit	Tune- up	Duty	Duty Cycle	Power Drift	Measured SAR(1g)	Report SAR(1g)	Plot	
		СН	MHz	(dBm)	(dBm)		Cycle	Scaling Factor	(dB)	(W/kg)	(W/kg)	No.	
	Rear	11	2462	15.63	16.00	1.089	100%	1.00	-0.12	0.020	0.022	-	
	Left	11	2462	15.63	16.00	1.089	100%	1.00	-	-	-	•	
802.11b	Right	11	2462	15.63	16.00	1.089	100%	1.00	-	-	-	•	
	Тор	11	2462	15.63	16.00	1.089	100%	1.00	-0.15	0.318	0.346	1	
	Bottom	11	2462	15.63	16.00	1.089	100%	1.00	-	-	-	-	

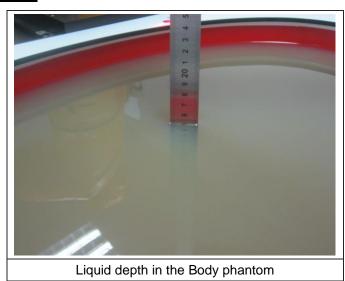
WiFi 5G U-NII-1													
Mode Test Position	Frequency		Conducted Power	Tune- up limit		Duty	Duty Cycle	Power Drift	Measured SAR(1g)	Report SAR(1g)	Plot		
	Position	СН	MHz	(dBm)	(dBm)	scaling factor	Cycle	le Scaling Factor	(dB)	(W/kg)	(W/kg)	No.	
	Rear	44	5220	16.53	17.00	1.114	100%	1.00	-0.08	0.007	0.008	-	
	Left	44	5220	16.53	17.00	1.114	100%	1.00	Ī	-	ı	-	
802.11a	Right	44	5220	16.53	17.00	1.114	100%	1.00	i	-	-	-	
	Тор	44	5220	16.53	17.00	1.114	100%	1.00	-0.14	0.039	0.043	2	
	Bottom	44	5220	16.53	17.00	1.114	100%	1.00	-	-	-	-	

	WiFi 5G U-NII-3												
Mode	Test Position	Frequency		Conducted Power	Tune- up limit	Tune- up	Duty	Duty Cycle	Power Drift	Measured SAR(1g)	Report SAR(1g)	Plot	
		СН	MHz	(dBm)	(dBm)	scaling	Cycle	Scaling Factor	(dB)	(W/kg)	(W/kg)	No.	
	Rear	149	5745	16.70	17.00	1.072	100%	1.00	0.10	0.014	0.015	-	
	Left	149	5745	16.70	17.00	1.072	100%	1.00	-	-	•	-	
802.11a	Right	149	5745	16.70	17.00	1.072	100%	1.00	-	-	•	-	
	Тор	149	5745	16.70	17.00	1.072	100%	1.00	-0.19	0.089	0.095	3	
	Bottom	149	5745	16.70	17.00	1.072	100%	1.00	-	-	•	-	

Note:SAR Test Data Plots to the Appendix A.

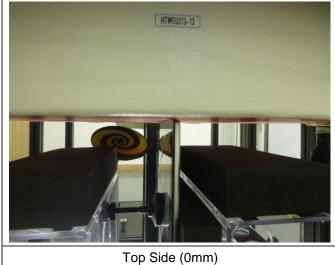
Report No: CHTEW19120198 Page: 33 of 33 Issued: 2019-12-26

14. TestSetup Photos





Rear (0mm)



15. External and Internal Photos of the EUT

Please reference to the report No.: CHTEW1912017401

--End of Report-----