

## TEST REPORT (SAR EVALUATION)

Applicant : PARAMOUNT BED Co., LTD.  
Address : Technical Center, 2-14-5 Higashisuna Koto-ku, Tokyo  
136-8670, Japan

Products : Low Energy WiFi Dual-Band 802.11a/b/g/n  
Model No. : SX100  
Serial No. : --  
FCC ID : 2AVYM-SX100

Test Standard : FCC Rules and Regulations Title 47 CFR Part 2

Test Results : Passed

Date of Test : November 11 ~ 13, 2019



Kousei Shibata  
Manager  
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- The test results in this test report was made by using the measuring instruments which are traceable to national standards of measurement in accordance with ISO/IEC 17025.
  - The applicable standard, testing condition and testing method which were used for the tests are based on the request of the applicant.
  - The test results presented in this report relate only to the offered test sample.
  - The contents of this test report cannot be used for the purposes, such as advertisement for consumers.
  - This test report shall not be reproduced except in full without the written approval of JQA.
  - VLAC does not approve, certify or warrant the product by this test report.

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## 1 Description of the Device Under Test (DUT)

### 1.1 General Information

1. Manufacturer : PARAMOUNT BED Co., LTD.  
Technical Center, 2-14-5 Higashisuna Koto-ku, Tokyo  
136-8670, Japan
2. Products : Low Energy WiFi Dual-Band 802.11a/b/g/n
3. Model No. : SX100
4. Serial No. : --
5. Transmitting Frequency : WLAN 2.4 GHz (DTS : 2412 MHz – 2462 MHz)  
WLAN 5 GHz (U-NII 1 : 5150 MHz – 5250 MHz)  
WLAN 5 GHz (U-NII 2A : 5250 MHz – 5350 MHz)  
WLAN 5 GHz (U-NII 2C : 5470 MHz – 5725 MHz)  
WLAN 5 GHz (U-NII 3 : 5725 MHz – 5850 MHz)
6. Power Rating : 3.3VDC
7. EUT Grounding : None
8. Device Category : Portable Device (§2.1093)
9. Exposure Category : General Population/Uncontrolled Exposure
10. FCC Rule Part(s) : 15.247, 15.407
11. EUT Authorization : Certification
12. Received Date of EUT : September 27, 2019

### 1.2 Host Device Information

1. Manufacturer : PARAMOUNT BED Co., LTD.  
Technical Center, 2-14-5 Higashisuna Koto-ku, Tokyo  
136-8670, Japan
2. Products : Nemuri SCAN
3. Model No. : NN-1520U / NN-1520UP
4. Serial No. : W19F0002
5. Product Type : Pre-production
6. Date of Manufacture : June, 2019
7. Battery Option : None (supplied via USB)

### 1.3 Wireless Technologies

Air Interface	Description	
WLAN (DTS)	Frequency band(s)	2.4 GHz
	Operating mode	802.11b 802.11g 802.11n [HT20]
WLAN (U-NII)	Frequency band(s)	5 GHz
	Operating mode	802.11a 802.11n [HT20]
	TDWR (Terminal Doppler Weather Rader)	Supported
	Band gap channel	Supported

### 1.4 Maximum Output Power

The power set for SAR testing has included the tune up tolerance, +1.5dBm as the worst case configuration and is for testing purpose only. The device placing to the market will be set to equal or less than the power result documented on the grants.

Mode		Ch#	Tune-up Limit (dBm)	
			Typical	Max.
WLAN 2.4 GHz (DTS)	802.11b	1	17.0	18.5
		6	17.0	18.5
		11	17.0	18.5
	802.11g	1	14.0	15.5
		6	17.0	18.5
		11	16.0	17.5
	802.11n [HT20]	1	13.0	14.5
		6	17.0	18.5
		11	15.5	17.0

Mode		Ch#	Tune-up Limit (dBm)	
			Typical	Max.
WLAN 5 GHz (UNII)	802.11a	36	11.0	12.5
		40	11.0	12.5
		44	11.0	12.5
		48	11.0	12.5
		52	11.0	12.5
		56	11.0	12.5
		60	11.0	12.5
		64	11.0	12.5
		100	11.0	12.5
		120	11.0	12.5
		140	11.0	12.5
		144	11.0	12.5
		149	11.0	12.5
		157	11.0	12.5
		165	11.0	12.5
	802.11n [HT20]	36	10.0	11.5
		40	10.0	11.5
		44	10.0	11.5
		48	10.0	11.5
		52	10.0	11.5
		56	10.0	11.5
		60	10.0	11.5
		64	10.0	11.5
		100	10.0	11.5
		120	10.0	11.5
		140	10.0	11.5
		144	10.0	11.5
		149	10.0	11.5
		157	10.0	11.5
		165	10.0	11.5

## 2 Summary of Test Results

Applied Standard : FCC Rules and Regulations Title 47 CFR Part 2 – Frequency Allocations and Radio Treaty Matters; General Rules and Regulations  
§2.1093 Radiofrequency radiation exposure evaluation: portable devices

Test Configuration	Reported 1 g SAR (W/kg)			Limit (W/kg)
	Licensed	DTS	U-NII	
Body-worn	N/A	1.41	0.82	1.6
Simultaneous Transmission	N/A	N/A	N/A	

The test results are **passed** for exposure limits specified in ANSI/IEEE Std. C95.1.

In the approval of test results,

- Determining compliance with the limits in this report was based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.
- No deviations were employed from the applied standard.
- No modifications were conducted by JQA to achieve compliance to the limitations.

Reviewed by  
Shigeru Kinoshita / Assistant Manager



Tested by  
Yasuhisa Sakai / Manager



### 3 Test Procedure

The tests documented in this report were performed in accordance with FCC 47 CFR §2.1093, IEEE Std.1528–2013 and the following KDB Procedures.

# 248227 D01 802.11 Wi-Fi SAR v02r02

# 447498 D01 General RF Exposure Guidance v06

# 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04

# 865664 D02 RF Exposure Reporting v01r02

### 4 Test Location

Japan Quality Assurance Organization (JQA)

KITA-KANSAI Testing Center SAITO EMC Branch

7-3-10, Saito-asagi, Ibaraki-shi, Osaka 567-0085, Japan

### 5 Recognition of Test Laboratory

JQA KITA-KANSAI Testing Center SAITO EMC Branch is accredited under ISO/IEC 17025 by following accreditation bodies and the test facility is registered by the following bodies.

VLAC Accreditation No. : VLAC-001-2 (Expiry date : March 30, 2022)

A2LA Accreditation No. : 5498.01 (Expiry date : November 30, 2021)

VCCI Registration No. : A-0002 (Expiry date : March 30, 2022)

FCC Registration No. : JP5008 (Expiry date : March 30, 2022)

ISED Registration No. : JP0014 (Expiry date : November 30, 2021)

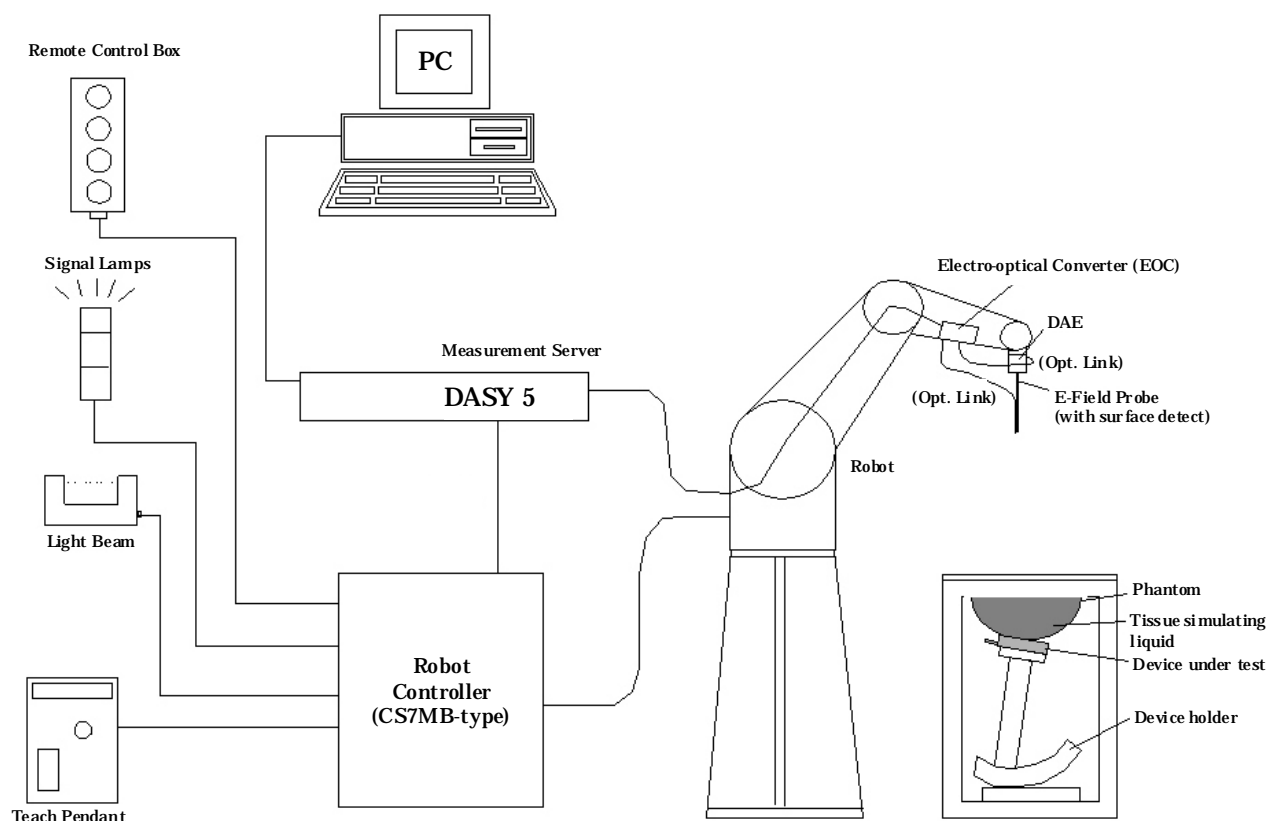
BSMI Registration No. : SL2-IS-E-6006, SL2-IN-E-6006, SL2-R1/R2-E-6006, SL2-A1-E-6006  
(Expiry date : September 14, 2022)

Accredited as conformity assessment body for Japan electrical appliances and material law by METI.  
(Expiry date : February 22, 2022)

## 6 Measurement System Diagram

These measurements are performed using the DASY5 automated dosimetric assessment system (manufactured by Schmid & Partner Engineering AG (SPEAG) in Zürich, Switzerland). It consists of high precision robotics system, cell controller system, DASY5 measurement server, personal computer with DASY5 software, data acquisition electronic (DAE) circuit, the Electro-optical converter (EOC), near-field probe, and the twin SAM phantom containing the equivalent tissue. The robot is a six-axis industrial robot performing precise movements to position the probe to the location (points) of maximum electromagnetic field (EMF).

The Robot is connected to the cell controller to allow software manipulation of the robot. The DAE is connected to the EOC. The DAE performs the signal amplification, signal multiplexing, A/D conversion, offset measurements, mechanical surface detection, collision detection, etc. The EOC performs the conversion from the optical into digital electric signal of the DAE and transfers data to the DASY5 measurement server.





## 7 System Components

### 7.1 Probe Specification EX3DV4

**Construction** : Symmetrical design with triangular core  
Built-in shielding against static charges  
PEEK enclosure material (resistant to organic solvents, e.g., DGBE)

**Calibration** : In air form 10 MHz to 6 GHz  
In head tissue simulating liquid (HSL) and  
muscle tissue simulating liquid  
2450 MHz (accuracy  $\pm 12.0\%$ ;  $k=2$ )  
5250 MHz (accuracy  $\pm 13.1\%$ ;  $k=2$ )  
5600 MHz (accuracy  $\pm 13.1\%$ ;  $k=2$ )  
5750 MHz (accuracy  $\pm 13.1\%$ ;  $k=2$ )



**Frequency** : 10 MHz to 6 GHz  
Linearity:  $\pm 0.2$  dB (30 MHz to 6 GHz)

**Directivity** :  $\pm 0.3$  dB in HSL (rotation around probe axis)  
 $\pm 0.5$  dB in tissue material (rotation normal to probe axis)

**Dynamic Range** : 10  $\mu$ W/g to >100 mW/g; Linearity:  $\pm 0.2$  dB (noise: typically < 1  $\mu$ W/g)

**Dimensions** : Overall length 337 mm  
Tip length 20 mm  
Body diameter 12 mm  
Tip diameter 2.5 mm  
Distance from probe tip to dipole centers 1 mm

## 7.2 Twin SAM Phantom

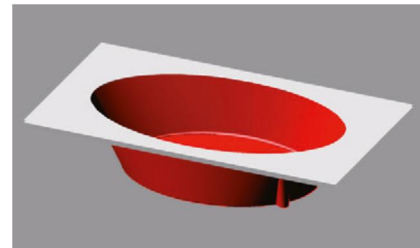
The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by teaching three points with the robot.



Shell Thickness :  $2 \pm 0.2$  mm; Center ear point:  $6 \pm 0.2$  mm  
Filling Volume : Volume Approx. 25 liters  
Dimensions :  $810 \times 1000 \times 500$  mm (H  $\times$  L  $\times$  W)

## 7.3 ELI4 Flat Phantom

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating 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.



Shell Thickness :  $2 \pm 0.2$  mm (sagging: <1%)  
Filling Volume : Volume Approx. 30 liters  
Dimensions : Major ellipse axis : 600 mm  
Minor axis : 400 mm

## 7.4 Mounting Device for Transmitters

In combination with the Twin SAM Phantom V4.0/V4.0c or ELI4, the Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat point).



## 8 Measurement Process

### Step 1 : Power Reference Measurement

The power reference job measures the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method. The minimum distance of probe sensors to surface set to 4 mm for an ET3DV6 probe, or 2 mm for EX3DV4 probe. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

### Step 2 : Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations in relatively coarse grids. When an area scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. If only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maxima within 2 dB of the maximum SAR value are detected, the number of zoom scans has to be increased accordingly.

### Step 3 : Zoom Scan

Zoom scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The zoom scan measures points specified in standards within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure.

### Step 4 : Z Scan

The Z scan measures points along a vertical straight line. The line runs along the Z axis of a one-dimensional grid. In order to get a reasonable extrapolation, the extrapolated distance should not be larger than the step size in Z-direction.

### Step 5 : Power Drift Measurement

The power drift measurement measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The power drift measurement gives the field difference in dB from the reading conducted within the last power reference measurement. The power reference measurement and power drift measurement are for monitoring the power drift of the device under test in the batch process.

## 9 Measurement Uncertainties

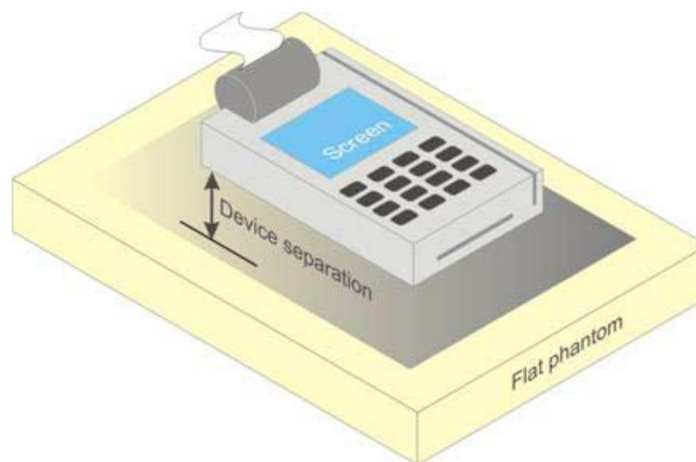
Per KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is  $< 1.5$  W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std. 1528-2013 is not required in SAR reports submitted for equipment approval.

## 10 Test Arrangement

### 10.1 RF Exposure Conditions

The body-supported devices include tablet type portable computers and credit card transaction authorization terminals, point-of-sale and/or inventory terminals. Where these devices may be torso or limb-supported, the same principles for body-supported devices are applied.

The SAR evaluation shall be performed for all surfaces of the DUT that are accessible during intended use. The separation distance in testing shall correspond to the intended use distance as specified in the user instructions provided by the manufacturer. If the intended use is not specified, all surfaces of the DUT shall be tested directly against the flat phantom.



Test positions for a body-supported device

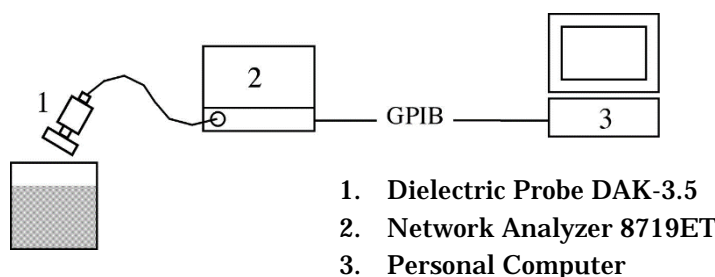
## 11 Tissue Verification

### 11.1 Tissue Verification Measurement Condition

The tissue 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 dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.

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

It is verified by using the dielectric probe and the network analyzer.



### 11.2 Tissue Dielectric Properties

The tissue dielectric properties are specified in KDB 865664 D01 Appendix A.

Target Frequency [MHz]	Head		Body	
	Permittivity ( $\epsilon_r$ )	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	Conductivity ( $\sigma$ )
150	52.3	0.76	61.9	0.80
300	45.3	0.87	58.2	0.92
450	43.5	0.87	56.7	0.94
835	41.5	0.90	55.2	0.97
900	41.5	0.97	55.0	1.05
915	41.5	0.98	55.0	1.06
1450	40.5	1.20	54.0	1.30
1610	40.3	1.29	53.8	1.40
1800 – 2000	40.0	1.40	53.3	1.52
2450	39.2	1.80	52.7	1.95
3000	38.5	2.40	52.0	2.73
5800	35.3	5.27	48.2	6.00

For tissue dielectric properties at other frequencies within the range, a linear interpolation method shall be used.



#### 11.4 Tissue Verification Results

Tissue dielectric parameters are measured at the low, middle and high frequency of each operating frequency range of the test device.

Date	Liquid	Frequency [MHz]	Parameters	Target	Measured	Deviation [%]	Limit [%]
11/11/2019	Body	2410	Permittivity ( $\epsilon_r$ )	52.8	52.78	-0.04	$\pm 5$
			Conductivity ( $\sigma$ )	1.91	1.890	-1.05	$\pm 5$
		2450	Permittivity ( $\epsilon_r$ )	52.7	52.61	-0.17	$\pm 5$
			Conductivity ( $\sigma$ )	1.95	1.943	-0.36	$\pm 5$
		2475	Permittivity ( $\epsilon_r$ )	52.7	52.53	-0.32	$\pm 5$
			Conductivity ( $\sigma$ )	1.99	1.977	-0.65	$\pm 5$
11/12/2019	Body	5180	Permittivity ( $\epsilon_r$ )	49.0	48.60	-0.82	$\pm 5$
			Conductivity ( $\sigma$ )	5.28	5.391	+2.10	$\pm 5$
		5250	Permittivity ( $\epsilon_r$ )	48.9	48.45	-0.92	$\pm 5$
			Conductivity ( $\sigma$ )	5.36	5.482	+2.28	$\pm 5$
		5320	Permittivity ( $\epsilon_r$ )	48.9	48.35	-1.12	$\pm 5$
			Conductivity ( $\sigma$ )	5.44	5.575	+2.48	$\pm 5$
11/13/2019	Body	5500	Permittivity ( $\epsilon_r$ )	48.6	48.03	-1.17	$\pm 5$
			Conductivity ( $\sigma$ )	5.65	5.814	+2.90	$\pm 5$
		5600	Permittivity ( $\epsilon_r$ )	48.5	47.86	-1.32	$\pm 5$
			Conductivity ( $\sigma$ )	5.77	5.955	+3.21	$\pm 5$
		5700	Permittivity ( $\epsilon_r$ )	48.3	47.64	-1.37	$\pm 5$
			Conductivity ( $\sigma$ )	5.88	6.102	+3.78	$\pm 5$
11/13/2019	Body	5720	Permittivity ( $\epsilon_r$ )	48.3	47.64	-1.37	$\pm 5$
			Conductivity ( $\sigma$ )	5.91	6.102	+3.25	$\pm 5$
		5750	Permittivity ( $\epsilon_r$ )	48.3	47.58	-1.49	$\pm 5$
			Conductivity ( $\sigma$ )	5.94	6.141	+3.38	$\pm 5$
		5850	Permittivity ( $\epsilon_r$ )	48.1	47.44	-1.37	$\pm 5$
			Conductivity ( $\sigma$ )	6.06	6.297	+3.91	$\pm 5$

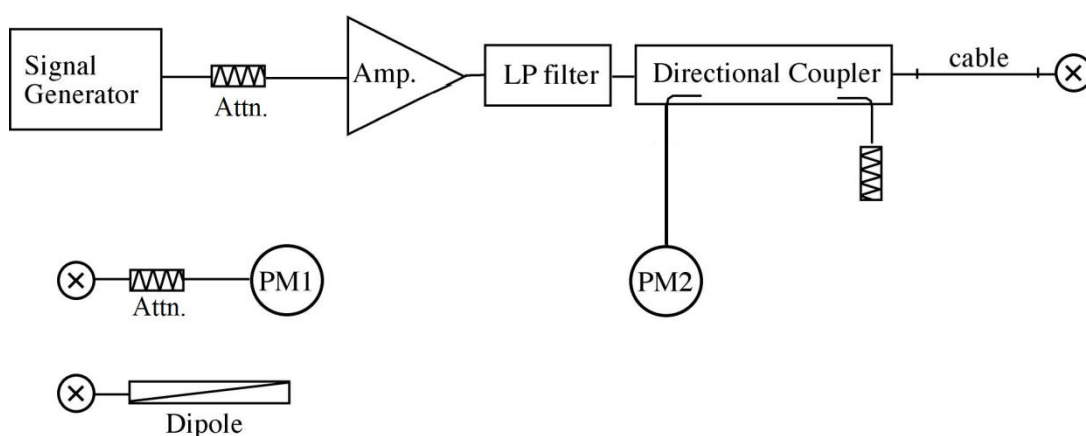


## 12 System Performance Check

### 12.1 System Performance Check Measurement Condition

The power meter PM1 (including Attenuator) measures the forward power at the location of the validation dipole connector. The signal generator is adjusted for 250 mW (100 mW for 3 to 6 GHz) at the dipole connector and the power meter PM2 is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter PM2.

The dipole antenna is matched to be used near flat phantom filled with tissue simulating solution. A specific distance holder is used in the positioning of the antenna to ensure correct spacing between the phantom and the dipole.



### 12.2 Target SAR Values for System Performance Check

The target SAR values can be obtained from the calibration certificate of system validation dipoles.

System Dipole		Cal. Date	Frequency [MHz]	Target SAR Values [W/kg]		
Type	Serial			1g/10g	Head	Body
D2450V2	714	8/14/2019	2450	1g	53.1	50.4
				10g	24.7	23.9
D5GHzV2	1111	8/16/2019	5250	1g	82.7	76.0
				10g	23.7	21.2
			5600	1g	86.1	79.5
				10g	24.7	22.2
			5750	1g	83.5	77.2
				10g	23.7	21.4

### 12.3 System Performance Check Results

The SAR measured with a system validation dipole, using the required tissue-equivalent medium at the test frequency, must be within 10 % of the manufacturer calibrated dipole SAR target.

Date	System Dipole		Liquid	Measured SAR [W/kg] (Normalized to 1 W)		Target	Deviation [%]	Limit [%]
	Type	Serial						
11/11/2019	D2450V2	714	Body	1 g	50.40	50.4	+0.00	± 10
				10 g	23.84	23.9	-0.25	± 10
11/12/2019	D5GHzV2 (5.25GHz)	1111	Body	1 g	79.30	76.0	+4.34	± 10
				10 g	22.60	21.2	+6.60	± 10
11/13/2019	D5GHzV2 (5.60GHz)	1111	Body	1 g	79.60	79.5	+0.13	± 10
				10 g	22.10	22.2	-0.45	± 10
11/13/2019	D5GHzV2 (5.75GHz)	1111	Body	1 g	80.50	77.2	+4.27	± 10
				10 g	22.90	21.4	+7.01	± 10

### 13 RF Output Power Measurements

#### 13.1 WLAN (DTS Band)

##### DTS Band Results

Band	Mode	Data Rate	Ch#	Frequency (MHz)	Average Power (dBm)	
					Measured	Spec. Max.
2.4 GHz (DTS)	802.11b	1 Mbps	1	2412	18.48	18.5
			6	2437	18.48	18.5
			11	2462	18.48	18.5
	802.11g	6 Mbps	1	2412	15.47	15.5
			6	2437	18.48	18.5
			11	2462	17.48	17.5
	802.11n [HT20]	MCS 0	1	2412	14.49	14.5
			6	2437	18.48	18.5
			11	2462	16.98	17.0

##### Note(s):

Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units. (802.11b DSSS and 802.11g/n OFDM configurations are considered separately.)

- When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.
- When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.

#### 13.2 WLAN (U-NII Band)

##### U-NII Band Results

Band	Mode	Data Rate	Ch#	Frequency (MHz)	Average Power (dBm)	
					Measured	Spec. Max.
5.2 GHz (U-NII 1)	802.11a	6 Mbps	36	5180	12.47	12.5
			40	5200	12.48	12.5
			44	5220	12.48	12.5
			48	5240	12.47	12.5
	802.11n [HT20]	MCS 0	36	5180	11.48	11.5
			40	5200	11.45	11.5
			44	5220	11.48	11.5
			48	5240	11.48	11.5

Band	Mode	Data Rate	Ch#	Frequency (MHz)	Average Power (dBm)	
					Measred	Spec. Max.
5.3 GHz (U-NII 2A)	802.11a	6 Mbps	52	5260	12.48	12.5
			56	5280	12.48	12.5
			60	5300	12.48	12.5
			64	5320	12.48	12.5
	802.11n [HT20]	MCS 0	52	5260	11.49	11.5
			56	5280	11.49	11.5
			60	5300	11.47	11.5
			64	5320	11.48	11.5
5.6 GHz (U-NII 2C)	802.11a	6 Mbps	100	5500	12.48	12.5
			120	5600	12.48	12.5
			140	5700	12.48	12.5
	802.11n [HT20]	MCS 0	100	5500	11.46	11.5
			120	5600	11.48	11.5
			140	5700	11.48	11.5
5.8 GHz (U-NII 3)	802.11a	6 Mbps	149	5745	12.48	12.5
			157	5785	12.48	12.5
			165	5825	12.47	12.5
	802.11n [HT20]	MCS 0	149	5745	11.47	11.5
			157	5785	11.48	11.5
			165	5825	11.49	11.5

## Note(s):

Power measurement is required for the transmission mode configuration with the highest maximum output power specified for production units.

- When the same highest maximum output power specification applies to multiple transmission modes, the largest channel bandwidth configuration with the lowest order modulation and lowest data rate is measured.
- When the same highest maximum output power is specified for multiple largest channel bandwidth configurations with the same lowest order modulation or lowest order modulation and lowest data rate, power measurement is required for all equivalent 802.11 configurations with the same maximum output power.

## 14 SAR Measurements

SAR test reduction criteria are as follows:

When 10 g extremity SAR is required, SAR values indicated below are multiplied by 2.5, i.e. the ratio of the 1 g and extremity 10 g SAR limit.

### KDB 248227 D01 802.11 Wi-Fi SAR:

SAR test reduction is determined according to 802.11 transmission mode configurations and certain exposure conditions with multiple test positions. In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. For OFDM in both 2.4 GHz and 5 GHz bands, an initial test configuration is first determined for each standalone and aggregated frequency band according to the maximum output power and tune-up tolerance specified for production units. When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band.

SAR is measured using the highest measured maximum output power channel for the determined exposure configurations. When there are multiple test channels with the same measured maximum output power, the channel closest to mid-band frequency is selected for SAR measurement. When there are multiple test channels with the same measured maximum output power and equal separation from mid-band frequency; for example, high and low channels or two mid-band channels, the higher frequency (number) channel is selected for SAR measurement.

An initial test position is applied to further reduce the number of SAR tests for devices operating in next to the ear, UMPC mini-tablet or hotspot mode exposure configurations that require multiple test positions SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration according to the OFDM procedures. The initial test position procedure is described in the following:

- When the reported SAR of the initial test position is  $\leq 0.4$  W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration and 802.11 transmission mode combination within the frequency band or aggregated band.
- When the reported SAR of the initial test position is  $> 0.4$  W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position using subsequent highest extrapolated or estimated 1 g SAR conditions determined by area scans or next closest/smallest test separation distance and maximum RF coupling test positions based on manufacturer justification, on the highest maximum output power channel, until the reported SAR is  $\leq 0.8$  W/kg or all required test positions (left, right, touch, tilt or subsequent surfaces and edges) are tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is  $> 0.8$  W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required channels are tested.

To determine the initial test position, Area Scans were performed to determine the position with the estimated 1 g SAR (fast SAR). The position that produced the highest fast SAR is considered the worst case position; thus used as the initial test position. The averaged fast SAR is scaled according to reported SAR requirements.

## 14.1 WLAN (DTS Band)

802.11b (1 Mbps) – Duty Cycle 100%										
RF Exposure Conditions	Test Position	Dist. [mm]	Ch#	Freq. [MHz]	Averaged Fast SAR [W/kg]	Power [dBm]		1 g SAR [W/kg]		Plot No.
						Tune-up Limit	Meas.	Meas.	Scaled	
Body-worn	Front	0	1	2412	1.366	18.5	18.48	1.33	1.336	
			6	2437	1.346	18.5	18.48	1.39	1.396	
			11	2462	1.246	18.5	18.48	1.26	1.266	
Body-worn	Front (repeat #1)	0	6	2437	1.417	18.5	18.48	1.40	1.406	1
802.11g (6 Mbps) – Duty Cycle 100%										
Body-worn	Front	0	6	2437	1.376	18.5	18.48	1.39	1.396	
802.11n HT20 (MCS 0) – Duty Cycle 100%										
Body-worn	Front	0	6	2437	1.376	18.5	18.48	1.38	1.386	

## Note(s):

SAR is not required for 802.11g/n OFDM configurations 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.

## Calculation for adjusted SAR:

Ch	Tune-up Limit [dBm]			802.11b SAR [W/kg]	Adjusted SAR [W/kg]	
	11b	11g	11n HT20		11g	11n HT20
Low	18.5	15.5	14.5	1.336	0.670	0.532
Mid	18.5	18.5	18.5	1.406	1.406	1.406
High	18.5	17.5	17.0	1.266	1.006	0.896

## 14.2 WLAN (U-NII Band)

## 14.2.1 5.2 GHz Band (U-NII 2A)

802.11a (6 Mbps) – Duty Cycle 100%										
RF Exposure Conditions	Test Position	Dist. [mm]	Ch#	Freq. [MHz]	Averaged Fast SAR [W/kg]	Power [dBm]		1 g SAR [W/kg]		Plot No.
						Tune-up Limit	Meas.	Meas.	Scaled	
Body-worn	Front	0	52	5260	0.188	12.5	12.48			
			56	5280	0.219	12.5	12.48			
			60	5300	0.249	12.5	12.48			
			64	5320	0.275	12.5	12.48	0.295	0.296	2

## Note(s):

The same maximum output power is specified for U-NII 1 and U-NII 2A band, therefore begin SAR measurement in U-NII 2A band by applying the OFDM SAR requirements.

The highest reported SAR for U-NII 2A band is  $\leq 1.2$  W/kg, then the SAR is not required for U-NII 1 band. SAR is not required for subsequent test configurations when the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.

## 14.2.2 5.6 GHz Band (U-NII 2C)

802.11a (6 Mbps) – Duty Cycle 100%										
RF Exposure Conditions	Test Position	Dist. [mm]	Ch#	Freq. [MHz]	Averaged Fast SAR [W/kg]	Power [dBm]		1 g SAR [W/kg]		Plot No.
						Tune-up Limit	Meas.	Meas.	Scaled	
Body-worn	Front	0	100	5500	0.194	12.5	12.48			
			120	5600	0.328	12.5	12.48	0.354	0.356	
			140	5700	0.517	12.5	12.48	0.537	0.539	3

## Note(s):

SAR is not required for subsequent test configurations when the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.

## 14.2.3 5.8 GHz Band (U-NII 3)

802.11a (6 Mbps) – Duty Cycle 100%										
RF Exposure Conditions	Test Position	Dist. [mm]	Ch#	Freq. [MHz]	Averaged Fast SAR [W/kg]	Power [dBm]		1 g SAR [W/kg]		Plot No.
						Tune-up Limit	Meas.	Meas.	Scaled	
Body-worn	Front	0	149	5745	0.619	12.5	12.48	0.624	0.627	
			157	5785	0.781	12.5	12.48	0.809	0.813	
			165	5825	0.711	12.5	12.47	0.770	0.775	
Body-worn	Front (repeat #1)	0	157	5785	0.771	12.5	12.48	0.812	0.816	4

## Note(s):

SAR is not required for subsequent test configurations when the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is  $\leq 1.2$  W/kg.

### 14.3 SAR Measurement Variability

In accordance with the KDB 865664 D01, these additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The DUT should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

- 1) Repeated measurement is not required when the original highest measured SAR is  $< 0.80$  W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
- 3) Perform a 2nd 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 (~ 10% from the 1-g SAR limit).
- 4) Perform a 3rd 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  $> 1.20$ .

#### 14.3.1 Highest Measured SAR Configuration in Each Frequency Band

Frequency Band [MHz]	Air Interface	Standalone SAR [W/kg]
2450	WLAN (DTS)	1.390
5250	WLAN (U-NII 2A)	0.295
5600	WLAN (U-NII 2C)	0.537
5750	WLAN (U-NII 3)	0.809

#### 14.3.2 Repeated SAR Measurement Results

Band	Test Position	Ch#	Frequency [MHz]	Measured SAR [W/kg]		Largest to Smallest SAR Ratio
				Original	Repeated	
WLAN (DTS)	Front	6	2437	1.39	1.40	1.01
WLAN (U-NII 3)	Front	157	5785	0.809	0.812	1.00



## 16 Test Instruments

Shielded Room S3				
Type	Model	Serial No. (ID)	Manufacturer	Cal. Due
E-Field Probe	EX3DV4	7321 (S-17)	SPEAG	2020/08/15
DAE	DAE4	508 (S-3)	SPEAG	2020/08/13
Robot	RX60L	F02/5R10A1/A/01 (S-7)	Stäubli	N/A
Probe Alignment Unit	LB5/80	SE UKS 030 AA (S-13)	SPEAG	N/A
Network Analyzer	E8357A	US41070304	Agilent	2020/10/28
Dielectric Probe	DAK-3.5	1124 (S-32)	SPEAG	2020/08/05
2450MHz Dipole	D2450V2	714 (S-6)	SPEAG	2020/08/13
5GHz Dipole	D5GHzV2	1111 (S-31)	SPEAG	2020/08/15
Signal Generator	MG3681A	6100216166 (B-3)	Anritsu	2020/09/10
Signal Generator	MG3710A	6201171711 (B-41)	Anritsu	2019/12/11
RF Power Amplifier	CGA020M602-2633R	B10840 (A-51)	R&K	N/A
Directional Coupler	4226-20	03736 (D-87)	Narda Microwave	N/A
Power Meter	E4417A	GB41290850 (B-51)	Agilent	2020/07/22
Power Sensor	E9323A	US40411939 (B-59)	Agilent	2020/07/24
Power Meter	N1911A	GB45100291 (B-63)	Agilent	2020/07/22
Power Sensor	N1921A	US44510470 (B-64)	Agilent	2020/07/22
Attenuator	54A-10	W5732 (D-30)	Weinschel	2020/08/15
Attenuator	2-10	AW7937 (D-40)	Weinschel	2020/10/31

NOTE : The calibration interval of the above test instruments is 12 months.

## 17 Appendix

Refer to separated files for the following appendixes.

Appendix 1 – System Performance Check Plots

Appendix 2 – Highest SAR Test Plots

Appendix 3 – Dosimetric E-Field Probe Calibration Data

Appendix 4 – System Validation Dipole Calibration Data