



# FCC SAR Test Report

Report No. : PSU-QSU2508120211SA01

Applicant : Shenzhen Alilo Smart Technology Co., Ltd

Address : 21st Floor, Block B, Building 1, International Innovation Valley, Dashi 1st Road,  
Nanshan District, Shenzhen City, Guangdong Province, Chin

Manufacturer : Shenzhen Alilo Smart Technology Co., Ltd

Address : 21st Floor, Block B, Building 1, International Innovation Valley, Dashi 1st Road,  
Nanshan District, Shenzhen City, Guangdong Province, Chin

Product : ALILO SMART AI BUNNY / ALILO TOY / ALILO DIGITAL PLAYER

FCC ID : 2AZOH-F6S-GPT

Brand : alilo, HUOHUOTU

Model No. : F6S-GPT, F6S-AI

Standards : FCC 47 CFR Part 2 (2.1093) / IEEE C95.1:1992 / IEEE 1528:2013  
KDB 865664 D01 v01r04 / KDB 865664 D02 v01r02 / KDB 447498 D01 v06  
KDB 248227 D01 v02r02

Date of Testing : Aug. 14, 2025~Aug. 14, 2025

FCC Designation No. : CN1325      FCC Site Registration No. : 434559

**CERTIFICATION:** The above equipment has been tested by **Huarui 7layers High Technology (Suzhou) Co., Ltd.**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's SAR characteristics under the conditions specified in this report. It should not be reproduced except in full, without the written approval of our laboratory. The client should not use it to claim product certification, approval, or endorsement by A2LA or any government agencies.

Prepared By :

Chang Gao

Chang Gao / Engineer

Approved By :

Sam Peibo

Peibo Sun / Manager

This report is governed by, and incorporates by reference, CPS Conditions of Service as posted at the date of issuance of this report at <http://www.bureauveritas.com/home/about-us/our-business/cps/about-us/terms-conditions> and is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. Measurement uncertainty is only provided upon request for accredited tests. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence or if you require measurement uncertainty; provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.



## Table of Contents

Release Control Record .....	3
1. Summary of Maximum SAR Value .....	4
2. Description of Equipment Under Test .....	5
3. SAR Measurement System .....	6
3.1 Definition of Specific Absorption Rate (SAR) .....	6
3.2 SPEAG DASY System .....	6
3.2.1 Robot.....	7
3.2.2 Probes.....	8
3.2.3 Data Acquisition Electronics (DAE) .....	8
3.2.4 Phantoms .....	9
3.2.5 Device Holder.....	10
3.2.6 System Validation Dipoles .....	10
3.2.7 Tissue Simulating Liquids.....	11
3.3 SAR System Verification .....	13
3.4 SAR Measurement Procedure .....	14
3.4.1 Area & Zoom Scan Procedure .....	14
3.4.2 Volume Scan Procedure.....	14
3.4.3 Power Drift Monitoring.....	15
3.4.4 Spatial Peak SAR Evaluation .....	15
3.4.5 SAR Averaged Methods.....	15
4. SAR Measurement Evaluation.....	16
4.1 EUT Configuration and Setting.....	16
4.2 EUT Testing Position .....	18
4.2.1 Body Exposure Conditions .....	18
4.2.2 SAR Test Exclusion Evaluations.....	18
4.3 Tissue Verification .....	19
4.4 System Verification.....	19
4.5 Maximum Output Power.....	20
4.5.1 Maximum Conducted Power .....	20
4.5.2 Measured Conducted Power Result.....	21
4.6 SAR Testing Results .....	22
4.6.1 SAR Test Reduction Considerations .....	22
4.6.2 SAR Results for Body Exposure Condition (Separation Distance is 0 cm Gap) .....	23
4.6.3 SAR Measurement Variability.....	23
4.6.4 Simultaneous Multi-band Transmission Evaluation .....	24
5. Calibration of Test Equipment.....	25
6. Measurement Uncertainty .....	26
7. Information on the Testing Laboratories .....	27
Appendix A. SAR Plots of System Verification	
Appendix B. SAR Plots of SAR Measurement	
Appendix C. Calibration Certificate for Probe and Dipole	
Appendix D. Photographs of EUT and Setup	



BUREAU  
VERITAS



## Release Control Record

Report No.	Reason for Change	Date Issued
PSU-QSU2508120211SA01	Initial release	Aug. 26, 2025



## 1. Summary of Maximum SAR Value

Equipment Class	Operating Mode	Highest Body SAR <sub>1g</sub> (0 cm Gap) (W/kg)
DTS	WLAN 2.4GHz	1.08
DTS	Bluetooth	NA

**Note:**

1. The SAR limit (**Head & Body: SAR<sub>1g</sub> 1.6 W/kg**) for general population / uncontrolled exposure is specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992.



## 2. Description of Equipment Under Test

<b>EUT Type</b>	ALILO SMART AI BUNNY / ALILO TOY / ALILO DIGITAL PLAYER
<b>FCC ID</b>	2AZOH-F6S-GPT
<b>Brand Name</b>	aliilo, HUOHUOTU
<b>Model Name</b>	F6S-GPT, F6S-AI
<b>HW Version</b>	V1.2
<b>SW Version</b>	SDC021PAAAR03A03M08
<b>Tx Frequency Bands (Unit: MHz)</b>	WLAN : 2412 ~ 2462 Bluetooth : 2402 ~ 2480
<b>Uplink Modulations</b>	802.11b : DSSS 802.11g/n/ax : OFDM Bluetooth : GFSK
<b>Maximum Tune-up Conducted Power (Unit: dBm)</b>	Please refer to section 4.5.1 of this report.
<b>Antenna Type</b>	Fixed Antenna
<b>EUT Stage</b>	Identical Prototype

**Note:**

1. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.



### **3. SAR Measurement System**

#### **3.1 Definition of Specific Absorption Rate (SAR)**

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density ( $\rho$ ). The equation description is as below:

$$SAR = \frac{d}{dt} \left( \frac{dW}{dm} \right) = \frac{d}{dt} \left( \frac{dW}{\rho dv} \right)$$

SAR is expressed in units of Watts per kilogram (W/kg)

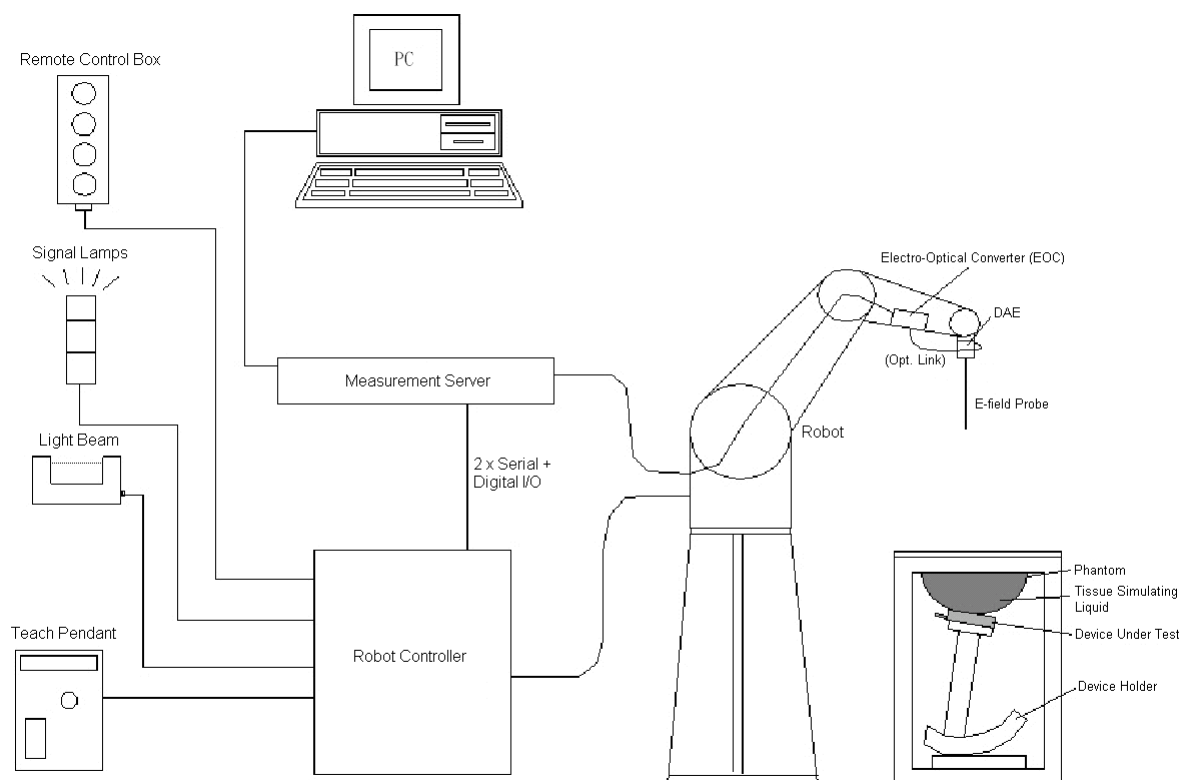
SAR measurement can be related to the electrical field in the tissue by

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

Where:  $\sigma$  is the conductivity of the tissue,  $\rho$  is the mass density of the tissue and E is the RMS electrical field strength.

#### **3.2 SPEAG DASY System**

DASY system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY5 software defined. The DASY software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion from the optical into digital electric signal of the DAE and transfers data to the PC.



**Fig-3.1 DASY System Setup**

### 3.2.1 Robot

The DASY system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:


- High precision (repeatability  $\pm 0.035$  mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)




**Fig-3.2 DASY**


### 3.2.2 Probes

The SAR measurement is conducted with the dosimetric probe. The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency.

<b>Model</b>	EX3DV4	
<b>Construction</b>	Symmetrical design with triangular core. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
<b>Frequency</b>	10 MHz to 6 GHz Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.3$ dB in HSL (rotation around probe axis) $\pm 0.5$ dB in tissue material (rotation normal to probe axis)	
<b>Dynamic Range</b>	10 $\mu$ W/g to 100 mW/g Linearity: $\pm 0.2$ dB (noise: typically $< 1$ $\mu$ W/g)	
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm	


<b>Model</b>	ES3DV3	
<b>Construction</b>	Symmetrical design with triangular core. Interleaved sensors. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE).	
<b>Frequency</b>	10 MHz to 4 GHz Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.2$ dB in HSL (rotation around probe axis) $\pm 0.3$ dB in tissue material (rotation normal to probe axis)	
<b>Dynamic Range</b>	5 $\mu$ W/g to 100 mW/g Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 3.9 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.0 mm	

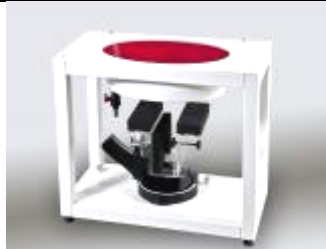
### 3.2.3 Data Acquisition Electronics (DAE)

<b>Model</b>	DAE3, DAE4	
<b>Construction</b>	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
<b>Measurement Range</b>	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
<b>Input Offset Voltage</b>	$< 5\mu$ V (with auto zero)	
<b>Input Bias Current</b>	$< 50$ fA	
<b>Dimensions</b>	60 x 60 x 68 mm	





### 3.2.4 Phantoms

<b>Model</b>	Twin SAM	
<b>Construction</b>	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.	
<b>Material</b>	Vinylester, glass fiber reinforced (VE-GF)	
<b>Shell Thickness</b>	$2 \pm 0.2$ mm ( $6 \pm 0.2$ mm at ear point)	
<b>Dimensions</b>	Length: 1000 mm Width: 500 mm Height: adjustable feet	
<b>Filling Volume</b>	approx. 25 liters	


<b>Model</b>	ELI	
<b>Construction</b>	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.	
<b>Material</b>	Vinylester, glass fiber reinforced (VE-GF)	
<b>Shell Thickness</b>	$2.0 \pm 0.2$ mm (bottom plate)	
<b>Dimensions</b>	Major axis: 600 mm Minor axis: 400 mm	
<b>Filling Volume</b>	approx. 30 liters	

### 3.2.5 Device Holder

<b>Model</b>	Mounting Device	
<b>Construction</b>	In combination with the Twin SAM Phantom 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, FCC or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat).	
<b>Material</b>	POM	

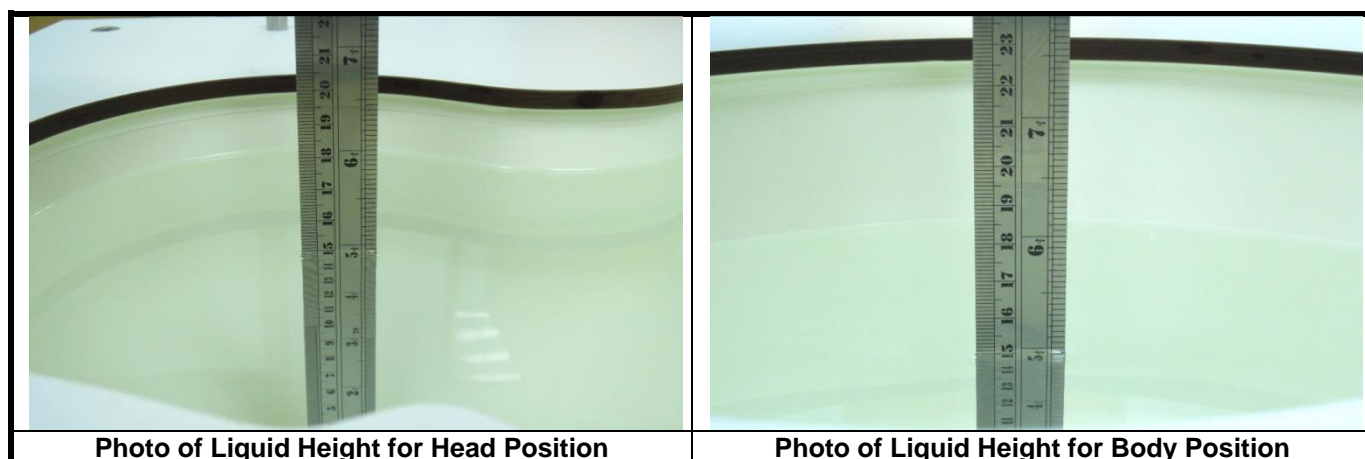
<b>Model</b>	Laptop Extensions Kit	
<b>Construction</b>	Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.). It is lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner.	
<b>Material</b>	POM, Acrylic glass, Foam	

### 3.2.6 System Validation Dipoles

<b>Model</b>	D-Serial	
<b>Construction</b>	Symmetrical dipole with 1/4 balun. Enables measurement of feed point impedance with NWA. Matched for use near flat phantoms filled with tissue simulating solutions.	
<b>Frequency</b>	750 MHz to 5800 MHz	
<b>Return Loss</b>	> 20 dB	
<b>Power Capability</b>	> 100 W (f < 1GHz), > 40 W (f > 1GHz)	

### 3.2.7 Tissue Simulating Liquids

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid height from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm. The nominal dielectric values of the tissue simulating liquids in the phantom and the tolerance of 5% are listed in Table-3.1.



The dielectric properties of the head tissue simulating liquids are defined in IEEE 1528, and KDB 865664 D01 Appendix A. The dielectric properties of the tissue simulating liquids were verified prior to the SAR evaluation using a dielectric assessment kit and a network analyzer.

**Table-3.1 Targets of Tissue Simulating Liquid**

Frequency (MHz)	Target Permittivity	Range of $\pm 5\%$	Target Conductivity	Range of $\pm 5\%$
<b>For Head</b>				
750	41.9	39.8 ~ 44.0	0.89	0.85 ~ 0.93
835	41.5	39.4 ~ 43.6	0.90	0.86 ~ 0.95
900	41.5	39.4 ~ 43.6	0.97	0.92 ~ 1.02
1450	40.5	38.5 ~ 42.5	1.20	1.14 ~ 1.26
1640	40.3	38.3 ~ 42.3	1.29	1.23 ~ 1.35
1750	40.1	38.1 ~ 42.1	1.37	1.30 ~ 1.44
1800	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
1900	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2000	40.0	38.0 ~ 42.0	1.40	1.33 ~ 1.47
2300	39.5	37.5 ~ 41.5	1.67	1.59 ~ 1.75
2450	39.2	37.2 ~ 41.2	1.80	1.71 ~ 1.89
2600	39.0	37.1 ~ 41.0	1.96	1.86 ~ 2.06
3500	37.9	36.0 ~ 39.8	2.91	2.76 ~ 3.06
5200	36.0	34.2 ~ 37.8	4.66	4.43 ~ 4.89
5300	35.9	34.1 ~ 37.7	4.76	4.52 ~ 5.00
5500	35.6	33.8 ~ 37.4	4.96	4.71 ~ 5.21
5600	35.5	33.7 ~ 37.3	5.07	4.82 ~ 5.32
5800	35.3	33.5 ~ 37.1	5.27	5.01 ~ 5.53



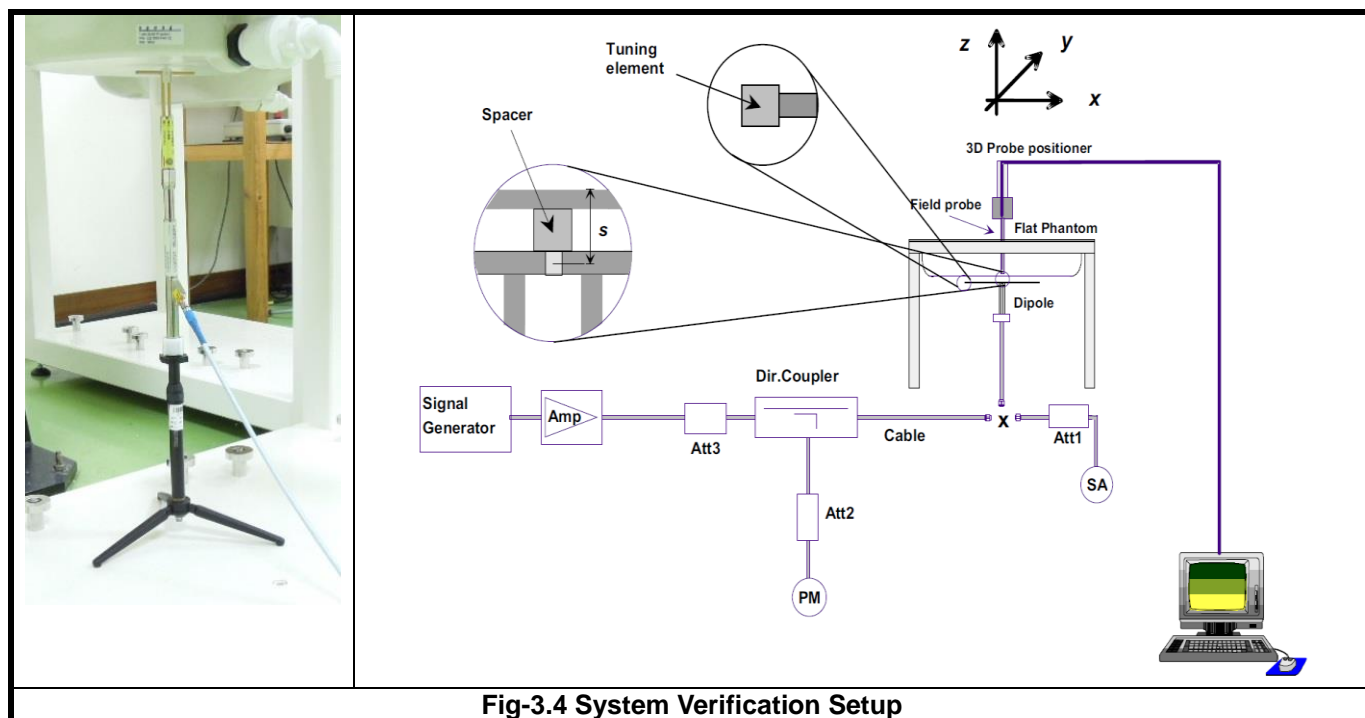
The following table gives the recipes for tissue simulating liquids.

**Table-3.2 Recipes of Tissue Simulating Liquid**

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
H750	0.2	-	0.2	1.5	56.0	-	42.1	-
H835	0.2	-	0.2	1.5	57.0	-	41.1	-
H900	0.2	-	0.2	1.4	58.0	-	40.2	-
H1450	-	43.3	-	0.6	-	-	56.1	-
H1640	-	45.8	-	0.5	-	-	53.7	-
H1750	-	47.0	-	0.4	-	-	52.6	-
H1800	-	44.5	-	0.3	-	-	55.2	-
H1900	-	44.5	-	0.2	-	-	55.3	-
H2000	-	44.5	-	0.1	-	-	55.4	-
H2300	-	44.9	-	0.1	-	-	55.0	-
H2450	-	45.0	-	0.1	-	-	54.9	-
H2600	-	45.1	-	0.1	-	-	54.8	-
H3500	-	8.0	-	0.2	-	20.0	71.8	-
H5G	-	-	-	-	-	17.2	65.5	17.3

### 3.3 SAR System Verification

The system check verifies that the system operates within its specifications. It is performed daily or before every SAR measurement. The system check uses normal SAR measurements in the flat section of the phantom with a matched dipole at a specified distance. The system verification setup is shown as below.



**Fig-3.4 System Verification Setup**

The validation dipole is placed beneath the flat phantom with the specific spacer in place. The distance spacer is touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The spectrum analyzer measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power at the dipole connector and the power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at power meter.

After system check testing, the SAR result will be normalized to 1W forward input power and compared with the reference SAR value derived from validation dipole certificate report. The deviation of system check should be within 10 %.

### 3.4 SAR Measurement Procedure

According to the SAR test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- Power reference measurement
- Area scan
- Zoom scan
- Power drift measurement

The SAR measurement procedures for each of test conditions are as follows:

- Make EUT to transmit maximum output power
- Measure conducted output power through RF cable
- Place the EUT in the specific position of phantom
- Perform SAR testing steps on the DASY system
- Record the SAR value

#### 3.4.1 Area & Zoom Scan Procedure

First Area Scan is used to locate the approximate location(s) of the local peak SAR value(s). The measurement grid within an Area Scan is defined by the grid extent, grid step size and grid offset. Next, in order to determine the EM field distribution in a three-dimensional spatial extension, Zoom Scan is required. The Zoom Scan is performed around the highest E-field value to determine the averaged SAR-distribution over 10 g. According to KDB 865664 D01, the resolution for Area and Zoom scan is specified in the table below.

Items	<= 2 GHz	2-3 GHz	3-4 GHz	4-5 GHz	5-6 GHz
Area Scan ( $\Delta x, \Delta y$ )	<= 15 mm	<= 12 mm	<= 12 mm	<= 10 mm	<= 10 mm
Zoom Scan ( $\Delta x, \Delta y$ )	<= 8 mm	<= 5 mm	<= 5 mm	<= 4 mm	<= 4 mm
Zoom Scan ( $\Delta z$ )	<= 5 mm	<= 5 mm	<= 4 mm	<= 3 mm	<= 2 mm
Zoom Scan Volume	>= 30 mm	>= 30 mm	>= 28 mm	>= 25 mm	>= 22 mm

**Note:**

When zoom scan is required and report SAR is <= 1.4 W/kg, the zoom scan resolution of  $\Delta x / \Delta y$  (2-3GHz: <= 8 mm, 3-4GHz: <= 7 mm, 4-6GHz: <= 5 mm) may be applied.

#### 3.4.2 Volume Scan Procedure

The volume scan is used for assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remain in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

### 3.4.3 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drift more than 5%, the SAR will be retested.

### 3.4.4 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g

### 3.4.5 SAR Averaged Methods

In DASY, the interpolation and extrapolation are both 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.

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. The uncertainty increases with the extrapolation distance. To keep the uncertainty within 1% for the 1 g and 10 g cubes, the extrapolation distance should not be larger than 5 mm.



## 4. SAR Measurement Evaluation

### 4.1 EUT Configuration and Setting

#### <Considerations Related to WLAN for Setup and Testing>

In general, various vendor specific external test software and chipset based internal test modes are typically used for SAR measurement. These chipset based test mode utilities are generally hardware and manufacturer dependent, and often include substantial flexibility to reconfigure or reprogram a device. A Wi-Fi device must be configured to transmit continuously at the required data rate, channel bandwidth and signal modulation, using the highest transmission duty factor supported by the test mode tools for SAR measurement. The test frequencies established using test mode must correspond to the actual channel frequencies. 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. In addition, a periodic transmission duty factor is required for current generation SAR systems to measure SAR correctly. The reported SAR must be scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

According to KDB 248227 D01, this device has installed WLAN engineering testing software which can provide continuous transmitting RF signal. During WLAN SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.

#### Initial Test Configuration

An initial test configuration is determined for OFDM transmission modes in 2.4 GHz and 5 GHz bands according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. 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.

#### Subsequent Test Configuration

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. Additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. When the highest reported SAR for the initial test configuration according to the initial test position or fixed exposure position requirements, 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, SAR is not required for that subsequent test configuration.

#### SAR Test Configuration and Channel Selection

When multiple channel bandwidth configurations in a frequency band have the same specified maximum output power, the initial test configuration is using largest channel bandwidth, lowest order modulation, lowest data rate, and lowest order 802.11 mode (i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over

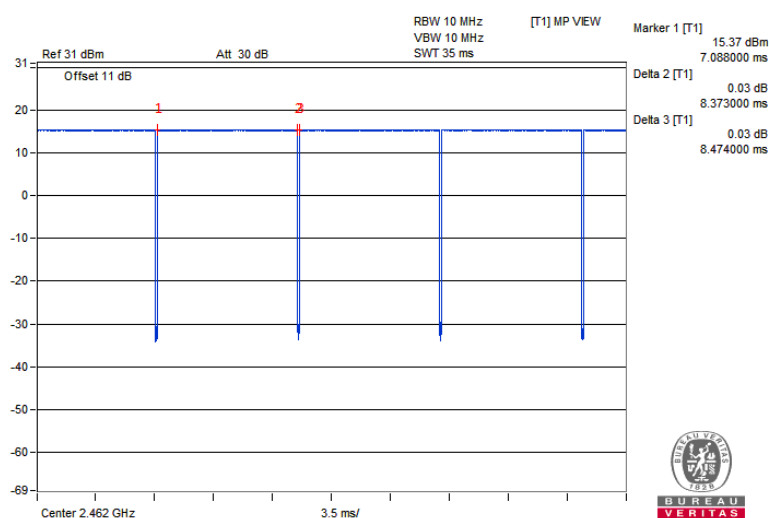


802.11n). After an initial test configuration is determined, if multiple test channels have the same measured maximum output power, the channel chosen for SAR measurement is determined according to the following.

- 1) The channel closest to mid-band frequency is selected for SAR measurement.
- 2) For channels with 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.

### <WLAN2.4G Duty Cycle of Test Signal>

**802.11b:** Duty cycle =  $8.373/8.474 \times 100 = 98.81\%$



### <Considerations Related to Bluetooth for Setup and Testing>

This device has installed Bluetooth engineering testing software which can provide continuous transmitting RF signal. During Bluetooth SAR testing, this device was operated to transmit continuously at the maximum transmission duty with specified transmission mode, operating frequency, lowest data rate, and maximum output power.



## 4.2 EUT Testing Position

### 4.2.1 Body Exposure Conditions

According to the antenna position diagram provided by the manufacturer, the test was conducted on the surface where the antenna is closest to the human body during expected user use. The separation distance between this EUT and phantom is 0 cm.

### 4.2.2 SAR Test Exclusion Evaluations

According to KDB 447498 D01, the SAR test exclusion condition is based on source-based time-averaged maximum conducted output power, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The SAR exclusion threshold is determined by the following formula.

$$\frac{\text{Max. Tune up Power}_{(\text{mW})}}{\text{Min. Test Separation Distance}_{(\text{mm})}} \times \sqrt{f_{(\text{GHz})}} \leq 3.0 \text{ for SAR-1g, } \leq 7.5 \text{ for SAR-10g}$$

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

Mode	Max. Tune-up Power (dBm)	Max. Tune-up Power (mW)	Ant. to Surface (mm)	Calculated Result	Require SAR Testing?
Bluetooth	4.0	2.51	5	0.79	No

**Note:**

When separation distance <= 50 mm and the calculated result shown in above table is <= 3.0 for SAR-1g exposure condition, or <= 7.5 for SAR-10g exposure condition, the SAR testing exclusion is applied.



### 4.3 Tissue Verification

The measuring results for tissue simulating liquid are shown as below.

Test Date	Tissue Type	Frequency (MHz)	Liquid Temp. (°C)	Measured Conductivity ( $\sigma$ )	Measured Permittivity ( $\epsilon_r$ )	Target Conductivity ( $\sigma$ )	Target Permittivity ( $\epsilon_r$ )	Conductivity Deviation (%)	Permittivity Deviation (%)
Aug. 14, 2025	Head	2450	22.6	1.841	40.127	1.80	39.20	2.28	2.36

**Note:**

The dielectric properties of the tissue simulating liquid must be measured within 24 hours before the SAR testing and within  $\pm 5\%$  of the target values. Liquid temperature during the SAR testing must be within  $\pm 2^\circ\text{C}$ .

### 4.4 System Verification

The measuring result for system verification is tabulated as below.

**<1g>**

Test Date	Mode	Input Power (mW)	Frequency (MHz)	1W Target SAR-1g (W/kg)	Measured SAR-1g (W/kg)	Normalized to 1W SAR-1g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Aug. 14, 2025	Head	50	2450	53.10	2.500	50.00	-5.84	893	3873	1389

**<10g>**

Test Date	Mode	Input Power (mW)	Frequency (MHz)	1W Target SAR-10g (W/kg)	Measured SAR-10g (W/kg)	Normalized to 1W SAR-10g (W/kg)	Deviation (%)	Dipole S/N	Probe S/N	DAE S/N
Aug. 14, 2025	Head	50	2450	24.90	1.170	23.40	-6.02	893	3873	1389

**Note:**

Comparing to the reference SAR value provided by SPEAG, the validation data should be within its specification of 10 %. The result indicates the system check can meet the variation criterion and the plots can be referred to Appendix A of this report.



## 4.5 Maximum Output Power

### 4.5.1 Maximum Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

Bluetooth			
Mode	Channel	Frequency (MHz)	Tune up limit (dBm)
BLE_1Mbps	0	2402	4.00
	19	2440	4.00
	39	2480	4.00
BLE_2Mbps	0	2402	4.00
	19	2440	4.00
	39	2480	4.00

2.4GHz WLAN			
Mode	Channel	Frequency (MHz)	Tune up limit (dBm)
802.11b 1Mbps	1	2412	13.00
	6	2437	13.00
	11	2462	13.00
802.11g 6Mbps	1	2412	13.00
	6	2437	13.00
	11	2462	13.00
802.11n-HT20 MCS0	1	2412	13.00
	6	2437	13.00
	11	2462	13.00
802.11n-HT40 MCS0	3	2422	13.00
	6	2437	13.00
	9	2452	13.00
802.11ax-HE20 MCS0	1	2412	13.00
	6	2437	13.00
	11	2462	13.00
802.11ax-HE40 MCS0	3	2422	13.00
	6	2437	13.00
	9	2452	13.00

**4.5.2 Measured Conducted Power Result**

The measuring conducted average power (Unit: dBm) is shown as below.

Bluetooth			
Mode	Channel	Frequency (MHz)	Average power (dBm)
BLE_1Mbps	0	2402	2.31
	19	2440	2.59
	39	2480	2.94
BLE_2Mbps	0	2402	2.32
	19	2440	2.61
	39	2480	2.97

2.4GHz WLAN			
Mode	Channel	Frequency (MHz)	Average power (dBm)
802.11b 1Mbps	1	2412	12.04
	6	2437	11.95
	11	2462	11.64
802.11g 6Mbps	1	2412	11.92
	6	2437	11.77
	11	2462	11.42
802.11n-HT20 MCS0	1	2412	11.89
	6	2437	11.68
	11	2462	11.36
802.11n-HT40 MCS0	3	2422	11.88
	6	2437	11.85
	9	2452	11.61
802.11ax-HE20 MCS0	1	2412	11.86
	6	2437	11.78
	11	2462	11.49
802.11ax-HE40 MCS0	3	2422	11.83
	6	2437	11.77
	9	2452	11.74



## 4.6 SAR Testing Results

### 4.6.1 SAR Test Reduction Considerations

#### <KDB 447498 D01, General RF Exposure Guidance>

1. Testing of other required channels within the operating mode of a frequency band is not required when the reported SAR for the mid-band or highest output power channel is:
  - (1)  $\leq 0.8$  W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\leq 100$  MHz
  - (2)  $\leq 0.6$  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
  - (3)  $\leq 0.4$  W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is  $\geq 200$  MHz
2. Per KDB 447498 D01v06, the scaled SAR is the measured SAR value adjusted for maximum tune-up tolerance.
  - (1) Scaled SAR(W/kg) = Measured SAR(W/kg) \* Duty Cycle Scaling Factor \* Tune-up Scaling Factor

#### <KDB 248227 D01, SAR Guidance for Wi-Fi Transmitters>

- (1) For handsets operating next to ear, hotspot mode or mini-tablet configurations, the initial test position procedures were applied. The test position with the highest extrapolated peak SAR will be used as the initial test position. When the reported SAR of initial test position is  $\leq 0.4$  W/kg, SAR testing for remaining test positions is not required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is  $\leq 0.8$  W/kg or all test positions are measured.
- (2) For WLAN 2.4 GHz, the highest measured maximum output power channel for DSSS was selected for SAR measurement. When the reported SAR is  $\leq 0.8$  W/kg, no further SAR testing is required. Otherwise, SAR is evaluated at the next highest measured output power channel. When any reported SAR is  $> 1.2$  W/kg, SAR is required for the third channel. For OFDM modes (802.11g/n), SAR is not required when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and it is  $\leq 1.2$  W/kg.

**4.6.2 SAR Results for Body Exposure Condition (Separation Distance is 0 cm Gap)**

Plot No.	Band	Mode	Test Position	Ch.	Duty Cycle %	Max. Tune-up Power (dBm)	Measured Conducted Power (dBm)	Power Drift	Measured SAR-1g (W/kg)	Duty Cycle Scaling Factor	Tune-up Scaling Factor	Scaled SAR-1g (W/kg)
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 1	1	98.81	13.00	12.04	0.19	0.840	1.012	1.247	1.060
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 1	6	98.81	13.00	11.95	0.11	0.699	1.012	1.274	0.901
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 2	1	98.81	13.00	12.04	0.12	0.699	1.012	1.247	0.882
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 2	6	98.81	13.00	11.95	0.17	0.586	1.012	1.274	0.755
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 3	1	98.81	13.00	12.04	0.16	0.560	1.012	1.247	0.707
P01	WLAN 2.4GHz	802.11b 1Mbps	Test Position 4	1	98.81	13.00	12.04	-0.18	0.854	1.012	1.247	<b>1.078</b>
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 4	6	98.81	13.00	11.95	-0.10	0.698	1.012	1.274	0.900
	WLAN 2.4GHz	802.11b 1Mbps	Test Position 5	1	98.81	13.00	12.04	0.16	0.596	1.012	1.247	0.752

**Note:**

SAR testing for WLAN was performed on the maximum power mode.

**4.6.3 SAR Measurement Variability**

According to KDB 865664 D01, SAR measurement variability was assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media are required for SAR measurements in a frequency band, the variability measurement procedures should be applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. Alternatively, if the highest measured SAR for both head and body tissue-equivalent media are  $\leq 1.45$  W/kg and the ratio of these highest SAR values, i.e., largest divided by smallest value, is  $\leq 1.10$ , the highest SAR configuration for either head or body tissue-equivalent medium may be used to perform the repeated measurement. 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 test device 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.

SAR repeated measurement procedure:

1. When the highest measured SAR is  $< 0.80$  W/kg, repeated measurement is not required.
2. When the highest measured SAR is  $\geq 0.80$  W/kg, repeat that measurement once.
3. 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, perform a second repeated measurement.
4. If the ratio of largest to smallest SAR for the original, first and second repeated measurements is  $> 1.20$ , and the original, first or second repeated measurement is  $\geq 1.5$  W/kg, perform a third repeated measurement.

Band	Test Position	Separation Distance (cm)	Ch.	Original Measured SAR-1g (W/kg)	1st Repeated SAR-1g (W/kg)	L/S Ratio	2nd Repeated SAR-1g (W/kg)	L/S Ratio	3rd Repeated SAR-1g (W/kg)	L/S Ratio
WLAN 2.4GHz	Test Position 4	0cm	1	0.854	0.841	1.015	N/A	N/A	N/A	N/A



#### 4.6.4 Simultaneous Multi-band Transmission Evaluation

##### <Estimated SAR Calculation>

According to KDB 447498 D01, when standalone SAR test exclusion applies to an antenna that transmits simultaneously with other antennas, the standalone SAR was estimated according to following formula to result in substantially conservative SAR values of  $\leq 0.4$  W/kg to determine simultaneous transmission SAR test exclusion.

$$\text{Estimated SAR} = \frac{\text{Max. Tune up Power}_{(\text{mW})}}{\text{Min. Test Separation Distance}_{(\text{mm})}} \times \frac{\sqrt{f_{(\text{GHz})}}}{7.5}$$

Where  $x = 7.5$  for 1-g SAR and  $x = 18.75$  for 10-g SAR.

If the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is used for estimated SAR calculation. When the test separation distance is  $> 50$  mm, the 0.4 W/kg is used for SAR-1g.

Mode / Band	Frequency (GHz)	Max. Tune-up Power (dBm)	Test Position	Separation Distance (mm)	Estimated 1g SAR (W/kg)
Bluetooth	2.48	4.0	Body	0	0.105

##### <Simultaneous Multi-band Transmission>

Since the Wi-Fi and BT of this device cannot transmit at the same time, simultaneous transmission evaluation is not necessary.

**Test Engineer** : Renjie Liu, and Zixiao Xia.





## 5. Calibration of Test Equipment

Equipment	Manufacturer	Model	SN	Cal. Date	Due Date
System Validation Dipole	SPEAG	D2450V2	893	Jun. 15, 2024	Jun. 13, 2026
Dosimetric E-Field Probe	SPEAG	EX3DV4	3873	Sep. 29, 2024	Sep. 28, 2025
Data Acquisition Electronics	SPEAG	DAE4	1389	Nov. 11, 2024	Nov. 10, 2025
Dielectric Probe Kit	SPEAG	DAK-3.5	1076	Aug. 20, 2024	Aug. 19, 2025
Radio Communication Analyzer	Rohde&Schwarz	CMW500	166205	Jun. 30, 2025	Jun. 29, 2026
ENA Series Network Analyzer	Agilent	E5071C	MY46214638	Jun. 30, 2025	Jun. 29, 2026
Power Meter	Agilent	N1914A	MY52180044	Jul. 01, 2025	Jun. 30, 2026
Power Sensor	Agilent	E9304A H18	MY52050011	Jul. 01, 2025	Jun. 30, 2026
Power Sensor	Agilent	E9304A H18	MY52050011	Jul. 01, 2025	Jun. 30, 2026
Temp. & Humi. Recorder	HUATO	A2000TH	HE20107712	Jul. 01, 2025	Jun. 30, 2026
Digital Thermometer	LINE SEIKI	DTM3000-spezial	3798	Jul. 16, 2025	Jul. 15, 2026
Attenuator 1	Weinschel	3M-10	25691	Jun. 30, 2025	Jun. 29, 2026
DC Block	Joinfront	JFDCB-18G-SMA	2100033922-03	NA	
Coupler	Woken	0110A056020-10	COM27RW1A3	NA	
Power Amplifier	Mimi-Circuits	ZVE-8G+	523101139	NA	



## 6. Measurement Uncertainty

DASY Uncertainty Budget According to IEEE 1528-2013 (0.3 - 3 GHz range)								
Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) 1g	(Ci) 10g	Standard Uncertainty (1g) (±%)	Standard Uncertainty (10g) (±%)	(Vi) Veff
<b>Measurement System</b>								
Probe Calibration	6.05	N	1	1	1	6.1	6.1	∞
Axial Isotropy	4.7	R	1.732	0.7	0.7	1.9	1.9	∞
Hemispherical Isotropy	9.6	R	1.732	0.7	0.7	3.9	3.9	∞
Boundary Effects	2.0	R	1.732	1	1	1.2	1.2	∞
Linearity	4.7	R	1.732	1	1	2.7	2.7	∞
System Detection Limits	1.0	R	1.732	1	1	0.6	0.6	∞
Modulation Response	3.2	R	1.732	1	1	1.8	1.8	∞
Readout Electronics	0.3	N	1	1	1	0.3	0.3	∞
Response Time	0.0	R	1.732	1	1	0.0	0.0	∞
Integration Time	2.6	R	1.732	1	1	1.5	1.5	∞
RF Ambient Noise	3.0	R	1.732	1	1	1.7	1.7	∞
RF Ambient Reflections	3.0	R	1.732	1	1	1.7	1.7	∞
Probe Positioner	0.4	R	1.732	1	1	0.2	0.2	∞
Probe Positioning	6.7	R	1.732	1	1	3.9	3.9	∞
Max. SAR Eval.	4.0	R	1.732	1	1	2.3	2.3	∞
<b>Test Sample Related</b>								
Device Positioning	4.0	N	1	1	1	4.0	4.0	35
Device Holder	4.9	N	1	1	1	4.9	4.9	12
Power Drift	5.0	R	1.732	1	1	2.9	2.9	∞
Power Scaling	0.0	R	1.732	1	1	0.0	0.0	∞
<b>Phantom and Setup</b>								
Phantom Uncertainty	6.6	R	1.732	1	1	3.8	3.8	∞
SAR correction	0.0	R	1.732	1	0.84	0.0	0.0	∞
Liquid Conductivity Repeatability	0.14	N	1	0.78	0.71	0.1	0.1	5
Liquid Conductivity (target)	10.0	R	1.732	0.78	0.71	4.5	4.1	∞
Liquid Conductivity (mea.)	2.5	R	1.732	0.78	0.71	1.1	1.0	∞
Temp. unc. - Conductivity	2.61	R	1.732	0.78	0.71	1.2	1.1	∞
Liquid Permittivity Repeatability	0.03	N	1	0.23	0.26	0.0	0.0	5
Liquid Permittivity (target)	10.0	R	1.732	0.23	0.26	1.3	1.5	∞
Liquid Permittivity (mea.)	2.5	R	1.732	0.23	0.26	0.3	0.4	∞
Temp. unc. - Permittivity	1.78	R	1.732	0.23	0.26	0.2	0.3	∞
<b>Combined Std. Uncertainty</b>						13.6%	13.5%	578
<b>Coverage Factor for 95 %</b>						K=2	K=2	
<b>Expanded STD Uncertainty</b>						27.2%	26.9%	

**Uncertainty budget for frequency range 300 MHz to 3 GHz**



## **7. Information on the Testing Laboratories**

We, Huarui Saiwei (Suzhou) Technology Co., LTD., were founded in 2020 to provide our best service in EMC, Radio, Telecom and Safety consultation.

If you have any comments, please feel free to contact us at the following:

Add: Tower N, Innovation Center, 88 Zuyi Road, High-tech District, Suzhou City, Anhui Province

[Tel: +86 \(0557\) 368 1008](tel:+86(0557)3681008)

The road map of all our labs can be found in our web site also

[Web: http://www.7Layers.com](http://www.7Layers.com)

**---END---**



## Appendix A. SAR Plots of System Verification

The plots for system verification with largest deviation for each SAR system combination are shown as follows.



## Appendix B. SAR Plots of SAR Measurement

The SAR plots for highest measured SAR in each exposure configuration, wireless mode and frequency band combination, and measured SAR > 1.5 W/kg are shown as follows.



## Appendix C. Calibration Certificate for Probe and Dipole

The SPEAG calibration certificates are shown as follows.



BUREAU  
VERITAS



## Appendix D. Photographs of EUT and Setup