



REPORT No.: SZ25030399S01

TEST REPORT

APPLICANT : Suunto Sports
Technology(Dongguan)Co., Ltd.

PRODUCT NAME : Outdoor Watch

MODEL NAME : OW244

BRAND NAME : SUUNTO

FCC ID : 2BBLIOW244

STANDARD(S) : FCC 47 CFR Part 2 (2.1093)
IEEE 1528-2013

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Edited by: Pang Siyu
Pang Siyu (Rapporteur)

Approved by: Gan Yueming
Gan Yueming (Supervisor)

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Shenzhen Morlab Communications Technology Co., Ltd.
FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road,
Block67, BaoAn District, ShenZhen , GuangDong Province, P. R. China

Tel: 86-755-36698555

Http://www.morlab.cn

Fax: 86-755-36698525

E-mail: service@morlab.cn





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Changed History		
Version	Date	Reason for Change
1.0	2025-07-29	First edition

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during test as bellows:

Frequency Band		Highest SAR Summary	
		Next to mouth (Separation 10mm)	Wrist-worn (Separation 0mm)
		1g (W/kg)	10g (W/kg)
2.4GHz Bands	WLAN 2.4GHz	0.061	0.026
	Bluetooth (Estimated)	0.006	0.005

Highest Simultaneous Transmission SAR & EIRP:	0.043	Limit: 1
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Note:

1. The highest simultaneous transmission is scalar summation of Reported standalone SAR per FCC KDB 690783 D01 v01r03, and scalar SAR summation of all possible simultaneous transmission scenarios are < 1.6 W/kg (for next to mouth mode) or < 4.0 W/kg (for wrist-worn mode).
2. This device is compliance with Specific Absorption Rate (SAR) for general population or uncontrolled exposure limits specified in FCC 47 CFR Part 2 (2.1093) and ANSI/IEEE C95.1-2005, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2013.
3. The declarations of EUT presented in the report are provided by applicant and/or manufacturer, and the test laboratory is not responsible for the accuracy of the information.



2. Technical Information

Note: Provide by Applicant.

2.1. Applicant and Manufacturer Information

Applicant:	Suunto Sports Technology(Dongguan)Co., Ltd.
ApplicantAddress:	Room 108, No. 5, Longxi Road, Nancheng Street, Dongguan City, Guangdong
Manufacturer:	Suunto Oy
ManufacturerAddress:	Tammiston kauppatie 7 A, FIN-01510 Vantaa, Finland

2.2. Equipment under Test (EUT) Description

Product Name:	Outdoor Watch
EUT No.:	16#
Hardware Version:	MB244
Software Version:	2.42.15
Operation Frequency:	WLAN 2.4GHz: 2412 MHz ~ 2462 MHz Bluetooth: 2402 MHz ~ 2480 MHz NFC: 13.56 MHz
Modulation Technology:	802.11b : DSSS 802.11g/n20 : OFDM Bluetooth LE: GFSK (1Mbps,2Mbps) NFC: ASK
Antenna Type:	WLAN: metal frame Antenna Bluetooth: metal frame Antenna NFC: Coil Antenna

Note:

1. The test results of WLAN and Bluetooth was referred to the report SZ25030402S01.
2. For a more detailed description, please refer to specification or user's manual supplied by the applicant and/or manufacturer.

2.3. Environment of Test Site

Temperature:	18°C~25°C
Humidity:	35%~75% RH

During SAR test, EUT is in Traffic Mode (Channel Allocated) at Normal Voltage Condition. A communication link is set up with a System Simulator (SS) by air link, and a call is established.

The EUT shall use its internal transmitter. The antenna(s), battery and accessories shall be those specified by the Factory. The EUT battery must be fully charged and checked periodically during the test to ascertain uniform power output. If a wireless link is used, the antenna connected to the output of the base station simulator shall be placed at least 50 cm away from the handset.

The signal transmitted by the simulator to the antenna feeding point shall be lower than the output power level of the handset by at least 35 dB.

3. Specific Absorption Rate (SAR)

3.1. Introduction

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 or controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational or controlled exposure limits are higher than the limits for general population or uncontrolled.

3.2. SAR Definition

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 (ρ). The equation description is as below:

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

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

SAR measurement can be either related to the temperature elevation in tissue by

$$SAR = C \left(\frac{\delta T}{\delta t} \right)$$

Where: C is the specific heat capacity, δT is the temperature rise and δt is the exposure duration, or related to the electrical field in the tissue by

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength. However for evaluating SAR of low power transmitter, electrical field measurement is typically applied.

4. RF Exposure Limits

4.1. Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population or uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

4.2. Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population or uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

4.3. RF Exposure Limits

SAR Human Exposure Specified in ANSI/IEEE C95.1-1992 and Health Canada Safety Code 6

HUMAN EXPOSURE LIMITS		
	UNCONTROLLED ENVIRONMENT <i>General Population</i> (W/kg) or (mW/g)	CONTROLLED ENVIRONMENT <i>Occupational</i> (W/kg) or (mW/g)
SPATIAL PEAK SAR Brain	1.6	8.0
SPATIAL AVERAGE SAR Whole Body	0.08	0.4
SPATIAL PEAK SAR Hands, Feet, Ankles, Wrists	4.0	20

Note:

1. The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.
2. The Spatial Average value of the SAR averaged over the whole body.
3. The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.

5. Applied Reference Documents

Leading reference documents for testing:

Identity	Document Title	Remark
47 CFR Part 2.1093	Radio Frequency Radiation Exposure Evaluation: Portable Devices	/
IEEE 1528-2013	IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques	/
KDB 447498 D01v06	General RF Exposure Guidance	/
KDB 248227 D01v02r02	SAR Measurement Procedures for 802.11 Transmitters	/
KDB 865664 D01v01r04	SAR Measurement 100 MHz to 6 GHz	/
KDB 865664 D02v01r02	RF Exposure Reporting	/
KDB 941225 D06v02r01	SAR Evaluation Procedures For Portable Devices With Wireless Router Capabilities	/
Note: Any additions, deviation, or exclusions from the method shall be noted in the "Remark".		

6. SAR Measurement System

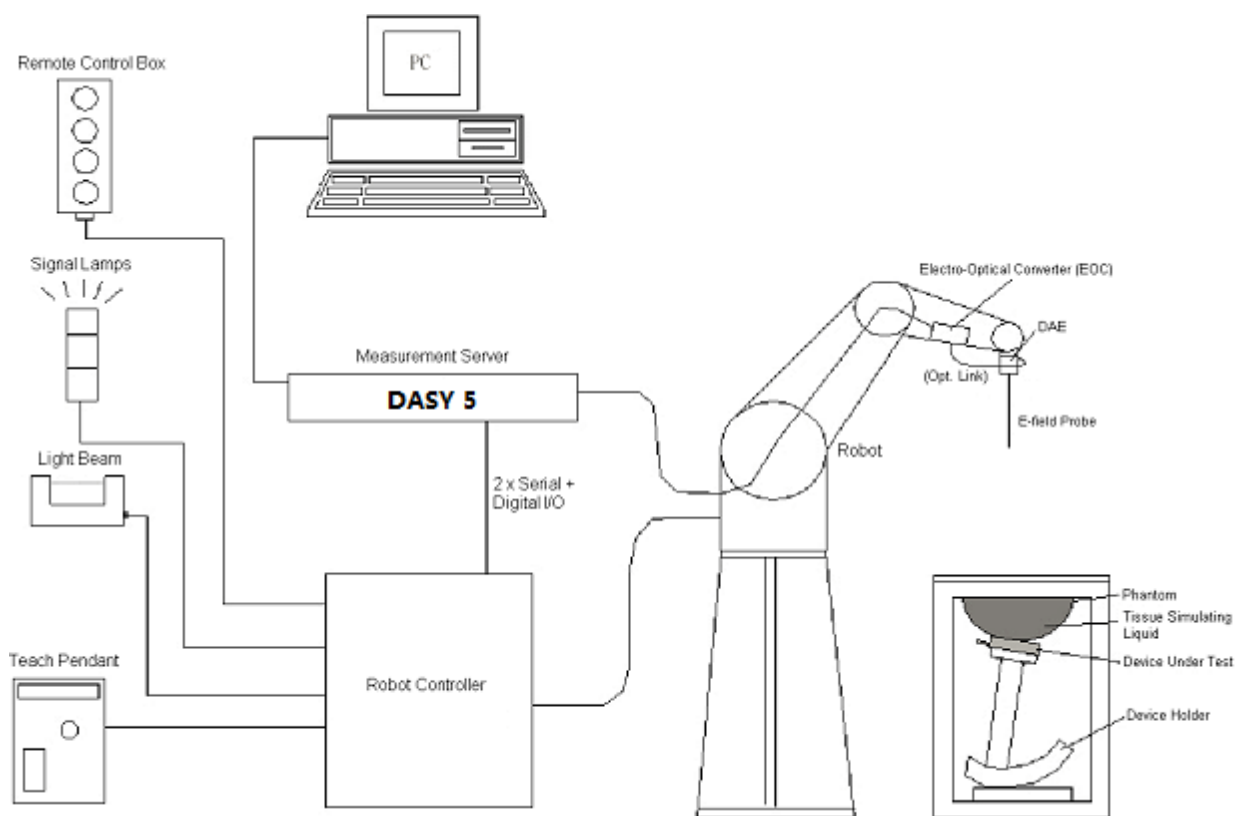


Fig.6.1 SPEAG DASY System Configurations

The DASY system for performance compliance tests is illustrated above graphically. This system consists of the following items:

- A standard high precision 6-axis robot with controller, a teach pendant and software.
- A data acquisition electronic (DAE) attached to the robot arm extension.
- A dosimetric probe equipped with an optical surface detector system.
- The electro-optical converter (EOC) performs the conversion between optical and electrical signals.
- A measurement server performs the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the accuracy of the probe positioning.
- A computer operating Windows XP.
- DASY software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom.
- A device holder.
- Tissue simulating liquid.
- Dipole for evaluating the proper functioning of the system.

Component details are described in the following sub-sections.

6.1. E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). 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. This probe has a built in optical surface detection system to prevent from collision with phantom.

➤ E-Field Probe Specification

<EX3DV3 Probe>

Construction	Symmetrical design with triangular core Built-in optical fiber for surface detection system. Built-in shielding against static charges. PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Frequency	10 MHz to 3 GHz; Linearity: ± 0.2 dB
Directivity	± 0.2 dB in HSL (rotation around probe axis) ± 0.4 dB in HSL (rotation normal to probe axis)
Dynamic Range	5 μ W/g to 100 mW/g; Linearity: ± 0.2 dB
Dimensions	Overall length: 330 mm (Tip: 16 mm) Tip diameter: 6.8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.7 mm

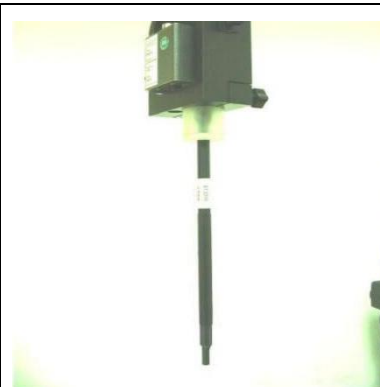


Fig 6.2 Photo of ES3DV3

<EX3DV4 Probe>

Construction	Symmetrical design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Frequency	10 MHz to 6 GHz; Linearity: ± 0.2 dB
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 mW/g; Linearity: ± 0.2 dB
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm

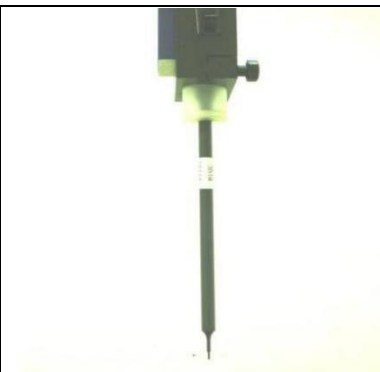


Fig 6.3 Photo of EX3DV4

➤ E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy shall be evaluated and within ± 0.25 dB. The sensitivity parameters (Norm X, Norm Y and Norm Z), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested. The calibration data can be referred to annex F of this report.

6.2. Data Acquisition Electronics (DAE)

The Data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock. The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



Fig. 6.4 Photo of DAE

6.3. Robot

The SPEAG DASY system uses the high precision robots (DASY5: TX60XL) type from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY5: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability 0.02 mm)
- High reliability (industrial design)
- Low maintenance costs (virtually maintenance free due to direct drive gears; nobelt drives)
- Jerk-free straight movements
- Low ELF interference (motor control fields shielded via the closed metallic construction shields)



Fig. 6.5 Photo of Robot

6.4. Measurement Server

The measurement server is based on a PC/104 CPU board with CPU (DASY5: 400MHz, Intel Celeron), chip-disk (DASY5: 128 MB), RAM (DASY5: 128 MB). The necessary circuits for communication with the DAE electronic box, as well as the 16 bit AD converter system for optical detection and digital I/O interface are contained on the DASY I/O board, which is directly connected to the PC/104 bus of the CPU board.

The measurement server performs all the real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operations.



Fig. 6.6 Photo of Server for DASY5

6.5. Light Beam Unit

The light beam switch allows automatic "tooling" of the probe. During the process, the actual position of the probe tip with respect to the robot arm is measured, as well as the probe length and the horizontal probe offset. The software then corrects all movements, such that the robot coordinates are valid for the probe tip.

The repeatability of this process is better than 0.1 mm. If a position has been taught with an aligned probe, the same position will be reached with another aligned probe within 0.1 mm, even if the other probe has different dimensions. During probe rotations, the probe tip will keep its actual position.



Fig. 6.7 Photo of Light Beam

6.6. Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%) Center ear point: 6 ± 0.2 mm
Filling Volume Dimensions	Approx. 25 liters Length: 1000 mm; Width: 500 mm; Height: adjustable feet
Measurement Areas	Left Head, Right Head, Flat phantom



Fig. 6.8 Photo of SAM Phantom

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

6.7. Device Holder

<Device Holder for SAM Twin Phantom>

The SAR in the phantom is approximately inversely proportional to the square of the distance between the source and the liquid surface. For a source at 5 mm distance, a positioning uncertainty of ±0.5 mm would produce a SAR uncertainty of ± 20 %. Accurate device positioning is therefore crucial for accurate and repeatable measurements. The positions in which the devices must be measured are defined by the standards.

The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear

reference point (ERP).

Thus the device needs no repositioning when changing the angles.

The DASY device holder is constructed of low-loss POM material having the following dielectric parameters: relative permittivity $\epsilon = 3$ and loss tangent $\delta = 0.02$. The amount of dielectric material has been reduced in the closest vicinity of the device, since measurements have suggested that the influence of the clamp on the test results could thus be lowered.

<Laptop Extension Kit>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Fig 6.9 Device Holder

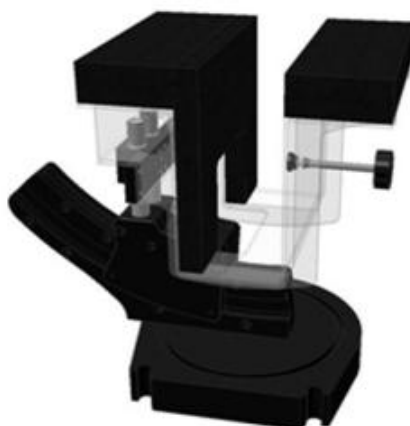


Fig 6.10 Laptop Extension Kit

6.8. Data Storage and Evaluation

➤ Data Storage

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files. The post-processing software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verifications of the complete software setup even after the measurement and allows correction of erroneous parameter settings. For example, if a measurement has been performed with an incorrect crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be reevaluated.

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

➤ Data Evaluation



The DASY post-processing software (SEMCAD) 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	Norm _i , a _{i0} , a _{i1} , a _{i2}
	- Conversion	ConvF _i
	- Diode compression point	dcp _i
Device Parameters:	- Frequency	f
	- Crest	cf
Media Parameters:	- Conductivity	σ
	- 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 DASY components. In the direct measuring mode of the multi-meter 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:

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

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

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

cf = crest factor of exciting field (DASY parameter)

dcp_i= diode compression point (DASY parameter)

From the compensated input signals, the primary field data for each channel can be evaluated:

$$\text{E- Field Probes: } E_i = \sqrt{\frac{v_i}{\text{Norm}_i \cdot \text{ConvF}}}$$

$$\text{H-Field Probes: } H_i = \sqrt{V_i} \cdot \frac{a_{i0} + a_{i1}f + a_{i2}f^2}{f}$$

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

Norm_i= sensor sensitivity of channel i, (i = x, y, z), μV/ (V/m) 2

ConvF = sensitivity enhancement in solution

a_{ij} = sensor sensitivity factors for H-field probes

f = carrier frequency (GHz)

E_i = electric field strength of channel i in V/m

H_i = magnetic field strength of channel i in A/m

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



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

The primary field data are used to calculate the derived field units.

$$\text{SAR} = E_{\text{tot}}^2 \cdot \frac{\sigma}{\rho \cdot 1000}$$

With SAR = local specific absorption rate in mW/g
E_{tot} = total field strength in V/m

σ = conductivity in (mho/m) or (Siemens/m)

ρ = equipment tissue density in g/cm³

Note that the density is set to 1, to account for actual head tissue density rather than the density of the tissue simulating liquid.



6.9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial No./ SW Version	Calibration	
				Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	805	2024.10.22	2027.10.21
SPEAG	DOSIMETRIC ASSESSMENT SYSTEM	DASY6	52.10.4.1527	NCR	NCR
SPEAG	Dosimetric E-Field Probe	EX3DV4	7608	2025.03.20	2026.03.19
SPEAG	Data Acquisition Electronics	DAE4	1643	2025.03.21	2026.03.20
SPEAG	Twin-SAM	QD000P41Ax	2020	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Agilent	Network Analyzer	E5071B	MY42404762	2025.01.06	2026.01.05
SPEAG	Dielectric Assessment KIT	DAK-3.5	1279	2025.03.18	2026.03.17
mini-circuits	Amplifier	ZHL-42W+	608501717	NCR	NCR
Agilent	Signal Generator	N5182B	MY53050509	2024.09.11	2025.09.10
R&S	Power Sensor	NRP8S	103215	2025.01.06	2026.01.05
Agilent	Power Meter	E4416A	MY45102093	2024.09.11	2025.09.10
R&S	Power Sensor	NRP8S	103240	2025.01.06	2026.01.05
Anritsu	Power Meter	E4418B	GB43318055	2024.05.30	2025.05.29
Agilent	Dual Directional Coupler	778D	50422	NA	NA
MCL	Attenuation	351-218-010	N/A	NA	NA
R&S	Spectrum Analyzer	N9030A	MY54170556	2024.09.18	2025.09.17
KTJ	Thermo meter	TA298	N/A	2024.11.05	2025.11.04
SPEAG	Tissue Simulating Liquids	HBBL600-10000V6		24H	

Note:

1. The calibration certificate of DASY can be referred to annex F of this report.
2. Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval.
3. The Insertion Loss calibration of Dual Directional Coupler and Attenuator were characterized via the network analyzer and compensated during system check.
4. The dielectric probe kit was calibrated via the network analyzer, with the specified procedure (calibrated in pure water) and calibration kit (standard) short circuit, before the dielectric measurement. The specific procedure and calibration kit are provided by SPEAG.
5. In system check we need to monitor the level on the power meter, and adjust the power amplifier level to have precise power level to the dipole; the measured SAR will be normalized to 1 W input power according to the ratio of 1 W to the input power to the dipole. For system check, the calibration of the power amplifier is deemed not critically required for correct measurement; the power meter is critical and we do have calibration for it.
6. Attenuator insertion loss is calibrated by the network Analyzer, which the calibration is valid,

before system check.

7. N.C.R means No Calibration Requirement.

7. Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid. 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, which is shown in Fig. 7.1, for body SAR testing, the liquid height from the centre of the flat phantom to liquid top surface is larger than 15 cm, which is shown in Fig. 7.2.

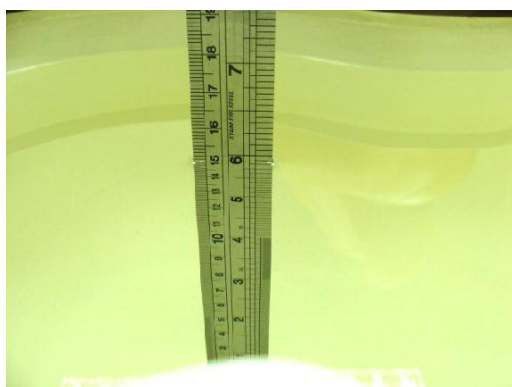


Fig 7.1 Photo of Liquid Height for Head SAR



Fig 7.2 Photo of Liquid Height for Body SAR

The following table gives the recipes for tissue simulating liquids

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity (σ)	Permittivity (ϵ_r)
Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
1800,1900,2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
2600	54.8	0	0	0.1	0	45.1	1.96	39.0

Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%



The relative permittivity and conductivity of the tissue material should be within $\pm 5\%$ of the values given in the table below recommended by the FCC OET 65 supplement C and RSS 102 Issue 5.

Target Frequency	Head		Body	
(MHz)	ϵ_r	σ (S/m)	ϵ_r	σ (S/m)
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

(ϵ_r = relative permittivity, σ = conductivity and $\rho = 1000 \text{ kg/m}^3$)

The dielectric parameters of liquids were verified prior to the SAR evaluation using a Speag Dielectric Probe Kit and an Agilent Network Analyzer.

The following table shows the measuring results for simulating liquid

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Conductivity (σ)	Conductivity Target (σ)	Delta (σ)(%)	Limit (%)	Date
2450	HSL	22.1	1.842	1.80	2.33	± 5	2025/5/22

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Permittivity (ϵ_r)	Permittivity Target (ϵ_r)	Delta (ϵ_r) (%)	Limit (%)	Date
2450	HSL	22.1	39.114	39.20	-0.22	± 5	2025/5/22

8. SAR System Verification

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the flat phantom and a corresponding distance holder.

➤ Purpose of System Performance Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

➤ System Setup

In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave that comes from a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the SAM twin phantom with the correct distance holder. The distance holder should touch the phantom surface with a light pressure at the reference marking and be oriented parallel to the long side of the phantom. The equipment setup is shown below:

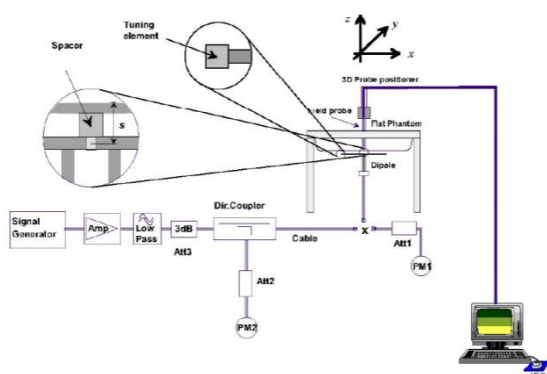


Fig.8.1 System Verification Setup Diagram

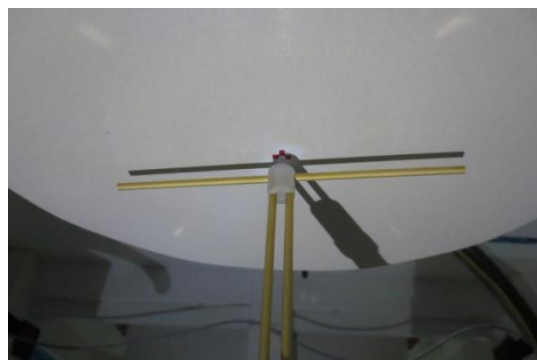


Fig.8.2 Photo of Dipole setup

**➤ System Verification Results**

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10%. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table as below indicates the system performance check can meet the variation criterion and the plots can be referred to annex C of this report.

Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N
2450	HSL	100	D2450V2-805	7608	1643

<1g SAR>

Date	Frequency (MHz)	Tissue Type	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2025/5/22	2450	HSL	5.39	52.80	53.9	2.08

<10g SAR>

Date	Frequency (MHz)	Tissue Type	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2025/5/22	2450	HSL	2.54	24.50	25.4	3.67

Note: System checks the specific test data please see annex C

9. EUT Testing Position

This EUT was tested in two different positions. They are front of face for head with phantom 10 mm gap, wrist-worn of the EUT with phantom 0 mm gap, as illustrated below, please refer to annex B for the test setup photos.

9.1. SAR Evaluations near the Mouth/Jaw Regions of the SAM

Transmitters that are built-in within a wrist watch or similar wrist-worn devices typically operate in speaker mode for voice communication, with the device worn on the wrist and positioned next to the mouth. Next to the mouth exposure requires 1-g SAR and the wrist-worn condition requires 10-g extremity SAR. The 10-g extremity and 1-g SAR test exclusions may be applied to the wrist and face exposure conditions. When SAR evaluation is required, next to the mouth use is evaluated with the front of the device positioned at 10 mm from a flat phantom filled with head tissue-equivalent medium. The wrist bands should be strapped together to represent normal use conditions. SAR for wrist exposure is evaluated with the back of the device positioned in direct contact against a flat phantom filled with body tissue-equivalent medium. The wrist bands should be unstrapped and touching the phantom. The space introduced by the watch or wrist bands and the phantom must be representative of actual use conditions; otherwise, if applicable, the neck or a curved head region of the SAM phantom may be used, provided the device positioning and SAR probe access issues have been addressed through a KDB inquiry. When other device positioning and SAR measurement considerations are necessary, a KDB inquiry is also required for the test results to be acceptable; for example, devices with rigid wrist bands or electronic circuitry and/or antenna(s) incorporated in the wrist bands. These test configurations are applicable only to devices that are worn on the wrist and cannot support other use conditions; therefore, the operating restrictions must be fully demonstrated in both the test reports and user manuals.

9.2. Limb-worn Accessory Configurations

- To position the device parallel to the phantom surface with either keypad up or down.
- To adjust the device parallel to the flat phantom.
- To adjust the distance between the device surface and the flat phantom to 10 mm or holster surface and the flat phantom to 0 mm.

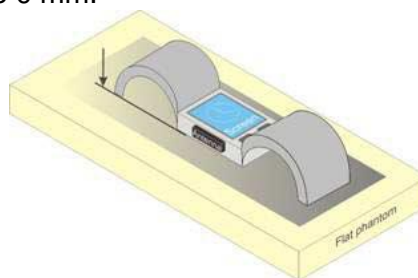


Fig.9.1 Illustration for Limb-worn Position

10.Measurement Procedures

The measurement procedures are as bellows:

<Conducted power measurement>

- For WWAN power measurement, use base station simulator to configure EUT WWAN transition in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- Read the WWAN RF power level from the base station simulator.
- For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band.
- Connect EUT RF port through RF cable to the power meter or spectrum analyzer, and measure WLAN/BT output power.

<Conducted power measurement>

- Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- Place the EUT in positions as annex B demonstrates.
- Set scan area, grid size and other setting on the DASY software.
- Measure SAR results for the highest power channel on each testing position.
- Find out the largest SAR result on these testing positions of each band.
- Measure SAR results for other channels in worst SAR testing position if the Reported SAR or highest power channel is larger than 0.8 W/kg.

According to the 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

10.1. 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 10 g 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 1 g and 10 g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

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

10.2. 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. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

10.3. Area & Zoom Scan Procedures

Area scans are defined prior to the measurement process being executed with a user defined variable spacing between each measurement point (integral) allowing low uncertainty measurements to be conducted. Scans defined for FCC applications utilize a 10mm² step integral, with 1mm interpolation used to locate the peak SAR area used for zoom scan assessments.



When an Area Scan has measured all reachable points, it computes the field maxima founding the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE 1528-2003.

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. A density of 1000 kg/m³ is used to represent the head and body tissue density and not the phantom liquid density, in order to be consistent with the definition of the liquid dielectric properties, i.e. the side length of the 1g cube is 10mm, with the side length of the 10 g cube 21.5 mm. The zoom scan integer steps can be user defined so as to reduce uncertainty, but normal practice for typical test applications utilize a physical step of 5 x 5 x 7 (8 mm x 8 mm x 5 mm) providing a volume of 32 mm in the X & Y axis, and 30mm in the Z axis.

10.4. Volume Scan Procedures

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 post-processor scan combine and subsequently superpose these measurement data to calculating the multiband SAR.

10.5. SAR Averaged Methods

In DASYS, 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 1g and 10g cubes, the extrapolation distance should not be larger than 5 mm.

10.6. 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 drifts more than 5%, the SAR will be retested.

11. Conducted RF Output Power

➤ **Remark:**

The output power of WLAN/Bluetooth refers to the annex E of this report.

➤ **Exclusion SAR for NFC**

Mode	Frequency (MHz)	Max Emission (dBuV/m)	Max Emission (V/m)	Time-averaging EIRP (mW)
NFC	13.56	61.86	0.0012	0.00046

Note:

1. The Max Emission of NFC was referred to the report SZ25030399W03.
2. The maximum power of NFC is less than 1 mW per the manual information, therefore it is not required for RF exposure.

12. Exposure Positions Consideration

Remark:

1. The location of antenna was recorded in annex B.
2. Next to mouth/Wrist-worn mode SAR assessments are required.
3. Per KDB 447498 D01v06, When SAR evaluation is required, next to the mouth use is evaluated with the front of the device positioned at 10 mm from a flat phantom filled with head tissue-equivalent medium. SAR for wrist exposure is evaluated with the back of the devices positioned in direct contact against a flat phantom fill with body tissue-equivalent medium.

13. SAR Test Results Summary

➤ General Note

1. Per KDB 447498 D01v06, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
 - a) Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
 - b) For SAR testing of WLAN signal with non-100% duty cycle, the measured SAR is scaled-up by the duty cycle scaling factor which is equal to "1/(duty cycle)".
 - c) For WLAN/Bluetooth: Reported SAR (W/kg) = Measured SAR (W/kg) * Duty Cycle scaling factor * Tune-up scaling factor.
2. Per KDB 447498 D01v06, for each exposure position, 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:
 - a) ≤ 0.8 W/kg or 2.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100 MHz
 - b) ≤ 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
 - c) ≤ 0.4 W/kg or 1.0 W/kg, for 1-g or 10-g respectively, when the transmission band is ≥ 200 MHz
3. Per KDB 865664 D01v01r04, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8 W/kg.
4. Per KDB 447498 D01v06, for each exposure position, if the highest output power channel Reported SAR ≤ 0.8 W/kg, other channels SAR testing is not necessary.
5. The maximum power of NFC is less than 1mW per the manual, therefore it is not required for RF exposure.

➤ **Next to Mouth SAR Data**

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Meas. SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
1#	2.4GHz/802.11b	Front Side	1	8.81	9.50	1.172	0.052	0.061

Note:

1. Per KDB 447498 D01v06, for each exposure position, if the highest output power channel Reported SAR ≤ 0.8 W/kg, other channels SAR testing is not necessary.
2. Per KDB 447498 D01v06, next to the mouth use is evaluated with the front of the device positioned at 10 mm from a flat phantom filled with head tissue-equivalent medium.
3. Per KDB 447498 D01v06, Next to the mouth exposure requires 1-g SAR, and the wrist-worn condition requires 10-g extremity SAR.
4. Per KDB 248227 D01v02r02, for 802.11b DSSS, when the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required in that exposure configuration.
5. Per KDB 248227 D01v02r02, for 802.11b DSSS, when the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required in that exposure configuration.
6. Per KDB 248227 D01v02r02, OFDM 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 the adjusted SAR is ≤ 1.2 W/kg.

➤ **Wrist-worn SAR Data**

Plot No.	Band/Mode	Test Position	CH.	Ave. Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Meas. SAR _{10g} (W/kg)	Reported SAR _{10g} (W/kg)
2#	2.4GHz/802.11b	Back Side	1	8.81	9.50	1.172	0.022	0.026

Note:

1. Per KDB 447498 D01v06, for each exposure position, if the highest output channel Reported SAR ≤ 2.0 W/kg, other channels SAR testing is not necessary.
2. Per KDB 447498 D01v06, When SAR evaluation is required, SAR for wrist exposure is evaluated with the back of the devices positioned in direct contact against a flat phantom fill with head tissue-equivalent medium.
3. Per KDB 447498 D01v06, Next to the mouth exposure requires 1-g SAR, and the wrist-worn condition requires 10-g extremity SAR.
4. Per KDB 248227 D01v02r02, for 802.11b DSSS, when the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required in that exposure configuration.
5. Per KDB 248227 D01v02r02, OFDM 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 the adjusted SAR is ≤ 1.2 W/kg.

➤ Bluetooth Body SAR

When standalone SAR is not required to be measured, per FCC KDB 447498 D01v06 4.3.2), the following equation must be used to estimate the standalone 1g/10g SAR.

$$\text{Estimated SAR} = \frac{\sqrt{f(\text{GHz})}}{7.5} \cdot \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}}$$

$$\text{Estimated SAR} = \frac{\sqrt{f(\text{GHz})}}{18.75} \cdot \frac{\text{Max. power of channel, mW}}{\text{Min. Separation Distance, mm}}$$

Channel	Frequency (MHz)	Max. Tune-up Power (dBm)	Max. Power (mW)	Test Distance (mm)	Result	Exclusion Thresholds for 1g/10g SAR
CH 0	2402	-6.0	0.25	10	0.05	3.0
CH 0	2402	-6.0	0.25	5	0.04	7.5

Mode	Max. Tune-up Power (dBm)	Exposure Position	Next to mouth
		Test Distance (mm)	10
Bluetooth	-6.0	Estimated SAR (W/kg)	0.005

Mode	Max. Tune-up Power (dBm)	Exposure Position	Wrist-worn
		Test Distance (mm)	5
Bluetooth	-6.0	Estimated SAR (W/kg)	0.004

➤ Next to Mouth SAR Data

Plot No.	Band/Mode	Test Position	Gap.	CH.	Ave. Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Meas. SAR _{1g} (W/kg)	Reported SAR _{1g} (W/kg)
	Bluetooth/LE	Front Side	10mm	0	-6.80	-6.0	1.202	0.005	0.006

➤ Wrist-worn SAR Data

Plot No.	Band/Mode	Test Position	Gap.	CH.	Ave. Power (dBm)	Tune-Up Limit (dBm)	Tune-Up Scaling Factor	Meas. SAR _{10g} (W/kg)	Reported SAR _{10g} (W/kg)
	Bluetooth/LE	Back Side	0mm	0	-6.80	-6.0	1.202	0.004	0.005

Note: The estimated SAR is used only to determine simultaneous transmission SAR test exemption; it shall not be reported as the standalone SAR.

14. SAR Simultaneous Transmission Analysis

14.1. Simultaneous Transmission Consideration

No.	Simultaneous Transmission Consideration	Next to Mouth	Wrist-worn
1	WLAN 2.4GHz+Bluetooth+NFC	Yes	Yes

Note:

- WLAN 2.4GHz and Bluetooth achieve coexistence by rapidly switching on the same antenna, therefore the simultaneous transmission is required.
- Per KDB 447498D01v06, simultaneous transmission SAR evaluation procedures is as followed:
Step 1: If sum of 1 g SAR < 1.6 W/kg, Simultaneous SAR measurement is not required.
Step 2: If sum of 1 g SAR > 1.6 W/kg, ratio of SAR to peak separation distance for pair of transmitters calculated.
Step 3: If the ratio of SAR to peak separation distance is ≤ 0.04 , Simultaneous SAR measurement is not required.
Step 4: If the ratio of SAR to peak separation distance is > 0.04 , Simultaneous SAR measurement is required and simultaneous transmission SAR value is calculated.
(The ratio is determined by: $(SAR1 + SAR2) \wedge 1.5 / Ri \leq 0.04$,
Ri is the separation distance between the peak SAR locations for the antenna pair in mm.
- The worst condition for WLAN & Bluetooth & NFC will be calculated for transmitting simultaneously.

Formula:

$$TER = \sum_{i=1}^{i=n} \frac{SAR_i}{Limit_i} + \sum_{j=1}^{j=n} \frac{EIRP_j}{Limit_j} \leq 1$$

14.2. Simultaneous Transmission Analysis

➤ Next to Mouth Simultaneous Transmission for WLAN 2.4GHz+Bluetooth+NFC

WWAN Band	Exposure Position	1	2	3	1+2+3 TER (SAR/1.6 + EIRP /1)
		WLAN 2.4GHz	Bluetooth (Estimated)	NFC	
		1g SAR (W/kg)	1g SAR (W/kg)	EIRP (mW)	
N/A	Front Side	0.061	0.006	0.0005	0.043

➤ Wrist-worn Simultaneous Transmission for WLAN 2.4GHz+Bluetooth+NFC

WWAN Band	Exposure Position	1	2	3	1+2+3 TER (SAR/4.0 + EIRP /1)
		WLAN 2.4GHz	Bluetooth (Estimated)	NFC	
		10g SAR (W/kg)	10g SAR (W/kg)	EIRP (mW)	
N/A	Back Side	0.026	0.005	0.0005	0.009

15. Uncertainty Assessment

According to KDB 865664 D01 SAR measurement 100 MHz to 6GHz, when the highest measured 1-g SAR is less than 1.5 W/kg and 10-g extremity SAR less than 3.75 W/kg, the expanded SAR measurement uncertainty must be less than 30% with a confidence interval of $k=2$. When these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE 1528-2013 is not required in the SAR report and submitted for equipment approval. For this device, both the 1-g SAR is less than 1.5 W/kg. Therefore the measurement uncertainty table is not required in this report.



Annex A General Information

1. Identification of the Responsible Testing Laboratory

Laboratory Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Laboratory Address:	FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China
Telephone:	+86 755 36698555
Facsimile:	+86 755 36698525

2. Identification of the Responsible Testing Location

Name:	Shenzhen Morlab Communications Technology Co., Ltd.
Address:	FL.1-3, Building A, FeiYang Science Park, No.8 LongChang Road, Block 67, BaoAn District, ShenZhen, GuangDong Province, P. R. China

3. Facilities and Accreditations

The FCC designation number is CN1192, the test firm registration number is 226174.

Note:

The main report is end here and the other annex (B,C,D,E,F) will be submitted separately.

***** END OF MAIN REPORT *****