




TEST REPORT

Eurofins KCTL Co.,Ltd. 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea TEL: 82-70-5008-1021 FAX: 82-505-299-8311 www.kctl.co.kr		Report No.: KR25-SPF0028 Page (1) of (72)	KCTL
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7. Test Standards : IEEE 1528-2013, ANSI/IEEE C95.1, KDB Publication			
8. Test Results : Refer to the test result in the test report			
Affirmation	Tested by Name : Jewon Choi (Signature)		Technical Manager Name : Gyuhyun Shim (Signature)
			2025-06-18
Eurofins KCTL Co.,Ltd.			
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REPORT REVISION HISTORY

Date	Revision	Page No
2025-06-18	Originally issued	-

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Procedure number, issue date and title:



Calculations leading to the reported values are on file with the testing laboratory that conducted the testing.

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1. General information

Client : IRIVER
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 KOLAS No.: KT231

1.1 Report Overview

This report details the results of testing carried out on the samples listed in section 2, the results contained in this test report do not relate to other samples of the same product. The manufacturer should ensure that all products in series production are in conformity with the product sample detailed in this report.

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2. Device information

2.1 Basic description

Product Name		SP4000		
Product Model Name		PPF51		
Product Manufacturer		IRIVER		
Product Serial Number	Radiation	TP-072		
	Conduction	TP-048, TP-068		
Device Overview		Band & Mode	Operating Modes	Tx Frequency (MHz)
		2.4 GHz WLAN	Data	2 412.0 ~ 2 462.0
		U-NII-1	Data	5 180.0 ~ 5 240.0
		U-NII-3	Data	5 745.0 ~ 5 825.0
		Bluetooth	Data	2 402.0 ~ 2 480.0

2.2 Summary of SAR Test Results

Band	Equipment Class	Highest Reported
		1g SAR (W/kg)
		Body
2.4 GHz WLAN	DTS	1.12
U-NII-3	NII	1.23
Simultaneous SAR per KDB 690783 D01v01r03		1.35

2.3 #Antenna information

Antenna Type	LPS Antenna		
Band	WLAN 2.4 GHz/Bluetooth	UNII-1	UNII-3
Peak gain (dBi)	-2.00	-1.14	-2.48

2.4 #Maximum Tune-up power

This device operates using the following maximum output power specifications. SAR values were scaled to the maximum allowed power to determine compliance per KDB Publication 447498 D01v06.

2.4.1 #Maximum WLAN and Bluetooth Output Power

Band	Mode	Channel	Output Power(dBm)	
			Target	Max. Allowed
WLAN 2.4 GHz	802.11b	All Channel	16.00	17.00
	802.11g	All Channel	14.50	15.50
	802.11n(HT20)	All Channel	14.00	15.00
	802.11n(HT40)	All Channel	13.00	14.00
U-NII-1	802.11a	All Channel	6.00	7.00
	802.11n(HT20)	All Channel	6.00	7.00
	802.11n(HT40)	All Channel	5.00	6.00
	802.11ac(VHT80)	All Channel	5.00	6.00
U-NII-3	802.11a	All Channel	11.50	12.50
	802.11n(HT20)	All Channel	11.50	12.50
	802.11n(HT40)	All Channel	11.50	12.50
	802.11ac(VHT80)	All Channel	11.50	12.50
Bluetooth	BDR(GFSK)	All Channel	1.50	2.50
	EDR ($\pi/4$ DQPSK), EDR (8DPSK)	All Channel	0.00	1.00
	LE(1M-37)	All Channel	3.00	4.00

2.5 SAR Test Configurations

2.5.1 #DUT Antenna Locations

A diagram showing the location of the device antennas. Please refer to Appendix C.
 Since the diagonal dimension of this device is ≤ 20 cm, it is considered a "UMPC Mini-Tablet"

2.5.2 SAR Test Exclusion Considerations

Per FCC KDB 447498 D01v06, the 1g SAR exclusion threshold for distances < 50 mm is defined by the following equation:

$$\frac{\text{Max Power of Channel(mW)}}{\text{Test Separation Distance(mm)}} \times \sqrt{\text{Frequency(GHz)}} \leq 3.0(1g - SAR), 7.5(10g - SAR)$$

Mode	Position	Frequency	Maximum Allowed Power	Separation Distance	≤ 3.0 Not Required	≤ 7.5 Not Required
		MHz	mW	mm	1g-SAR	10g-SAR
U-NII-1	Body	5 240.0	5	5	2.29	N/A
Bluetooth	Body	2 480.0	2	5	0.63	
Bluetooth LE	Body	2 480.0	3	5	0.94	

Formulas round separation distance to nearest mm and power to nearest mW before calculating thresholds or exemption values.

Particular DUT edges are not required to be evaluated for UMPC Mini Tablet SAR if the edges are greater than 2.5 cm from the transmitting antenna according to FCC KDB Publication 941225 D07v01r02.

Band	Device Edge for SAR Testing (Front View)					
	Front	Rear	Left Edge	Right Edge	Top	Bottom
WLAN 2.4 GHz	Yes	Yes	No	No	No	Yes
U-NII-3						

2.6 SAR Test Methods and Procedures

The tests documented in this report were performed in accordance with IEEE 1528-2013 and the following published KDB procedures:

- IEEE 1528-2013
- 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
- 941225 D07 UMPC Mini Tablet v01r02
- April 2019 TCB Workshop Notes (Tissue Simulating Liquids)

3. Specific Absorption Rate

3.1 Introduction

The 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.

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:

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

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

SAR measurement can be 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

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

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. SAR Measurement Procedures

4.1 SAR Scan Procedures

Step 1: Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements 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. The minimum distance of probe sensors to surface is 1.4 mm. 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 & Zoom 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 and 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. If only one Zoom Scan follows the Area Scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of Zoom Scans has to be increased accordingly. Area Scan & Zoom Scan Parameters extracted from KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04.

			≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface			5 mm ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2)$ mm 0.5 mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location			30° ± 1°	20° ± 1°
Maximum area scan spatial resolution: Δx _{Area} , Δy _{Area}			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
			When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	
Maximum zoom scan spatial resolution: Δx _{Zoom} , Δy _{Zoom}			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: Δz _{Zoom} (n)		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	Δz _{Zoom} (1): between 1st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		Δz _{Zoom} (n>1): between subsequent points	≤ 1.5 · Δz _{Zoom} (n-1) mm	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see IEEE Std 1528-2013 for details.				
* When zoom scan is required and the reported SAR from the area scan based 1-g SAR estimation procedures of KDB Publication 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

Step 3: Power drift measurement

The Power Drift Measurement measures the field at the same location as the most recent power reference measurement 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. This allows a user to monitor the power drift of the device under test within a batch process. The measurement procedure is the same as Step 1.

5. RF Exposure Limits

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/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.

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/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.

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Partial Peak SAR ¹⁾ (Partial)	1.60 mW/g	8.00 mW/g
Partial Average SAR ²⁾ (Whole Body)	0.08 mW/g	0.40 mW/g
Partial Peak SAR ³⁾ (Hands/Feet/Ankle/Wrist)	4.00 mW/g	20.00 mW/g

- 1) The spatial Peak value of the SAR averaged over any 1g 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.

6. FCC SAR General Measurement Procedures

6.1 Measured and Reported SAR

Per FCC KDB Publication 447498 D01v06, When SAR is not measured at the maximum power level allowed for production units, the results must be scaled to the maximum tune-up tolerance limit according to the power applied to the individual channels tested to determine compliance. For simultaneous transmission, the measured aggregate SAR must be scaled according to the sum of the differences between the maximum tune-up tolerance and actual power used to test each transmitter. When SAR is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported SAR. Test highest reported SAR results are identified on the grant of equipment authorization according to procedures in KDB 690783 D01v01r03.

6.2 SAR Testing with 802.11 Transmitters

The normal network operating configurations are not suitable for measuring the SAR of 802.11 a/b/g transmitters. Unpredictable fluctuations in network traffic and antenna diversity conditions can introduce undesirable variations in SAR results. The SAR for these devices should be measured using chipset based test mode software to ensure the results are consistent and reliable.

6.2.1 General Device Setup

Chipset based test mode software is hardware dependent and generally varies among manufacturers. The device operating parameters established in test mode for SAR measurements must be identical to those programmed in production units, including output power levels, amplifier gain settings and other RF performance tuning parameters. A periodic duty factor is required for current generation SAR systems to measure SAR. When 802.11 frame gaps are accounted for in the transmission, a maximum transmission duty factor of 92 – 96% is typically achievable in most test mode configurations. A minimum transmission duty factor of 85% is required to avoid certain hardware and device implementation issues related to wide range SAR scaling. The reported SAR is scaled to 100% transmission duty factor to determine compliance at the maximum tune-up tolerance limit.

6.2.2 Initial Test Position Procedure

For exposure conditions with multiple test positions, such as handset operating next to the ear, devices with hotspot mode or UMPC mini-tablet, procedures for initial test position can be applied. Using the transmission mode determined by the DSSS procedure or initial test configuration, area scans are measured for all positions in an exposure condition. The test position with the highest extrapolated (peak) SAR is used as the initial test position. When reported SAR for the initial test position is $\leq 0.4 \text{ W/kg}$, no additional testing for the remaining test positions is required. Otherwise, SAR is evaluated at the subsequent highest peak SAR positions until the reported SAR result is $\leq 0.8 \text{ W/kg}$ or all test positions are measured.

6.2.3 2.4 GHz SAR Test Requirement

SAR is measured for 2.4 GHz 802.11b DSSS using either the fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following.

- 1) 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 for 802.11b DSSS in that exposure configuration.
- 2) When the reported SAR is > 0.8 W/kg, SAR is required for that position using the next highest measured output power channel; i.e., all channels require testing.

2.4 GHz 802.11g/n OFDM are additionally evaluated for SAR if highest reported SAR for 802.11b, adjusted by the ratio of the OFDM to DSSS specified maximum output power, is > 1.2 W/kg. When SAR is required for OFDM modes in 2.4 GHz band, the Initial Test Configuration Procedures should be followed.

6.2.4 OFDM Transmission Mode and SAR Test Channel Selection

For the 2.4 GHz and 5 GHz band, when the same maximum output power was specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration with the largest channel bandwidth, lowest order modulation and lowest data rate. When the maximum output power of a channel is the same for equivalent OFDM configurations; for example, 802.11a, 802.11n and 802.11ac or 802.11g and 802.11n with the same channel band width, modulation and data rate etc., the lower order 802.11 mode i.e., 802.11a, then 802.11n and 802.11ac or 802.11g then 802.11n, is used for SAR measurement. When maximum output power are the same for multiple test channels, either according to the default or additional power measurement requirements, SAR is measured using the channel closest to the middle of the frequency band or aggregated band. When there are multiple channels with the same maximum output power, SAR is measured using the higher number channel.

6.2.5 Initial Test Configuration Procedure

For OFDM, in both 2.4 and 5 GHz bands, an initial test configuration is determined for each frequency band and aggregated band, according to the transmission mode with the highest maximum output power specified for SAR measurements. When the same maximum output power is specified for multiple OFDM transmission mode configurations in a frequency band or aggregated band, SAR is measured using the configuration(s) with the largest channel bandwidth, lowest order modulation, and lowest data rate. If the average RF output powers of the highest identical transmission modes are within 0.25 dB of each other, mid channel of the transmission mode with highest average RF output power is the initial test channel. Otherwise, the channel of the transmission mode with the highest average RF output conducted power will be the initial test configuration.

When the reported SAR is ≤ 0.8 W/kg, no additional measurements on other test channels are required. Otherwise, SAR is evaluated using the subsequent highest average RF output channel until the reported SAR result is ≤ 1.2 W/kg or all channels are measured. When there are multiple untested channels having the same subsequent highest average RF output power, the channel with higher frequency from the lowest 802.11 mode is considered for SAR measurements.

6.2.6 Subsequent Test Configuration Procedures

For OFDM configurations in each frequency band and aggregated band, SAR is evaluated for initial test configuration using the fixed test position or the initial test position procedure. When the highest reported SAR (for the initial test configuration), adjusted by the ratio of the specified maximum output power of the subsequent test configuration to initial test configuration, is ≤ 1.2 W/kg, no additional SAR tests for the subsequent test configurations are required. When 10g SAR measurement is considered, a factor of 2.5 is applied to the thresholds above.

6.3 UMPC Mini-Tablet Configurations

The test procedures are applicable to devices with a display and overall diagonal dimension ≤ 20 cm (~ 7.9 "). These devices are typically operated like a mini-tablet and are usually designed with certain UMPC features and operating characteristics; therefore, the term "UMPC Mini-Tablet" is used to identify the SAR test requirements for this category of devices. A composite test separation distance of 5 mm is applied to test UMPC mini-tablet transmitters and to maintain RF exposure conservativeness for the interactive operations associated with this type of devices.

According to KDB 941225D07, Extremity 10-g SAR is not required when 1-g SAR is tested at 5mm.



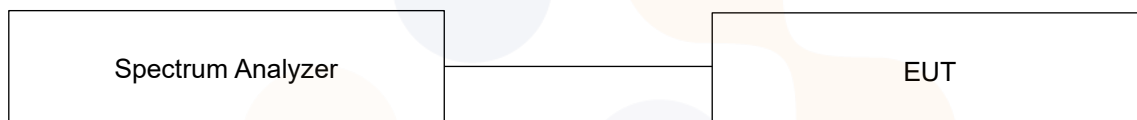
7. RF Average Conducted Output Power

7.1 WLAN & Bluetooth Average Conducted Output Power

Justification for test configurations for WLAN per KDB Publication 248227 D01v02r02:

- Power measurements were performed for the transmission mode configuration with the highest maximum output power specified for production units.
- For transmission modes with the same maximum output power specification, powers were measured for the largest channel bandwidth, lowest order modulation and lowest data rate.
- For transmission modes with identical maximum specified output power, channel bandwidth, modulation and data rates, power measurements were required for all identical configurations.
- For each transmission mode configuration, powers were measured for the highest and lowest channels; and at the mid-band channel(s) when there were at least 3 channels supported. For configurations with multiple mid-band channels, due to an even number of channels, both channels were measured.

Power Measurement Setup



7.1.1 WLAN Average Conducted Output Power

Band	Freq. [MHz]	Channel	Mode		
			802.11b	802.11g	802.11n(HT20)
WLAN 2.4 GHz	2 412.0	1	15.20	13.07	13.05
	2 437.0	6	15.82	13.86	13.76
	2 462.0	11	15.69	13.68	13.50
	-	-	802.11n(HT40)		
	2 422.0	3	12.91		
	2 437.0	7	12.68		
	2 452.0	11	12.33		

Band	Freq. [MHz]	Channel	Mode	
			802.11a	802.11n(HT20)
U-NII-1	5 180.0	36	5.55	5.51
	5 200.0	40	5.20	5.12
	5 240.0	48	6.40	6.54
	-	-	802.11n(HT40)	
	5 190.0	38	4.62	
	5 230.0	46	5.19	
	-	-	802.11ac(VHT80)	
	5 210.0	42	4.38	

Band	Freq. [MHz]	Channel	Mode	
			802.11a	802.11n(HT20)
U-NII-3	5 745.0	149	10.80	10.85
	5 785.0	157	10.84	10.90
	5 825.0	165	11.36	10.94
	-	-	802.11n(HT40)	
	5 755.0	151	11.36	
	5 795.0	159	11.63	
	-	-	802.11ac(VHT80)	
	5 775.0	155	11.47	

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7.1.2 Bluetooth Average Conducted Output Power

Mode	Freq. [MHz]	Channel	Conducted Powers (dBm)
BDR_DH5 (1 Mbps)	2 402.0	0	1.82
	2 441.0	39	1.60
	2 480.0	78	0.98
EDR_2-DH5 (2 Mbps)	2 402.0	0	-0.03
	2 441.0	39	-0.31
	2 480.0	78	-0.98
EDR_3-DH5 (3 Mbps)	2 402.0	0	-0.02
	2 441.0	39	-0.30
	2 480.0	78	-0.97
LE (1 Mbps 37)	2 402.0	0	3.35
	2 440.0	19	3.47
	2 480.0	39	2.96

7.2 Wireless Band Duty Cycle

Wireless Bands	Frequency Bands	Mode	Duty Cycle (%)
WLAN	2.4 GHz	802.11b	99.19
	U-NII-3	802.11ac(VHT80)	92.68

8. System Verification

8.1 Measurement date and environment

Shield room	Date	Environment	
		Temperature (°C)	Humidity (%)
8F - 4	2025-06-10	22.1 ~ 22.4	57.8 ~ 59.5
	2025-06-11	22.2 ~ 22.6	56.8 ~ 58.8

8.2 Tissue Verification

The dielectric properties for this Tissue Simulant Liquids were measured by using the SPEAG Model DAK3.5 Dielectric Probe in conjunction with Agilent E5071B Network Analyzer (300 kHz – 8 500 MHz). The Conductivity (σ) and Permittivity (ϵ_r) are listed in Table 1. For the SAR measurement given in this report. The temperature variation of the Tissue Simulant Liquids was (22 ± 2) °C.

Freq. (MHz)	Date	Permittivity (ϵ_r)	Conductivity (σ)	Temp. (°C)
				22 ± 2
2 450.0	2025-06-11	$39.20 \pm 5 \%$ (37.24 ~ 41.16)	$1.80 \pm 5 \%$ (1.71 ~ 1.89)	21.51
		39.55	1.85	
5 800.0	2025-06-10	$35.30 \pm 5 \%$ (33.54 ~ 37.07)	$5.27 \pm 5 \%$ (5.01 ~ 5.53)	21.48
		34.52	5.22	

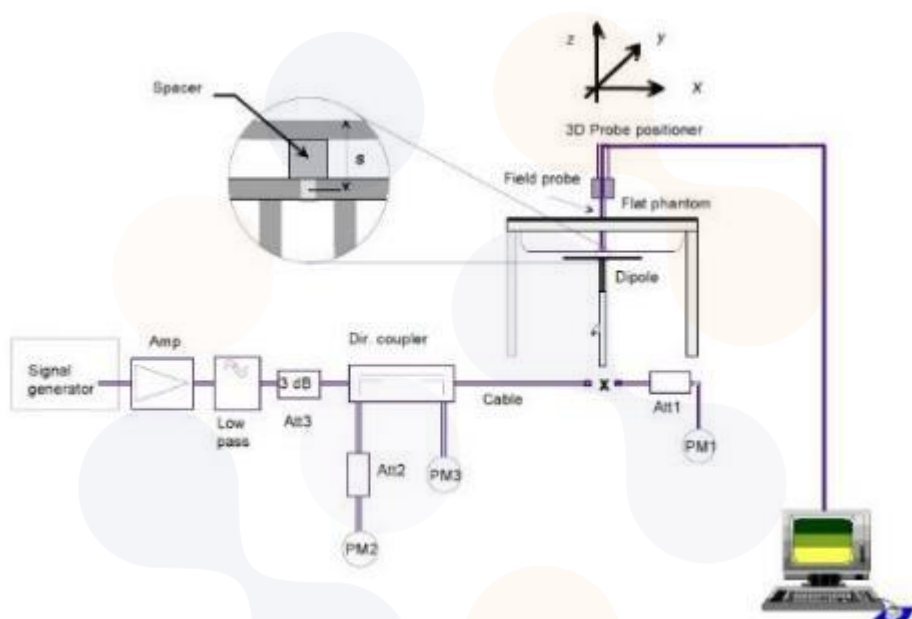
<Table 1. Measurement result of Tissue electric parameters>

8.3 Test System Verification

The microwave circuit arrangement for system verification is sketched below picture.

The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within $\pm 10\%$ from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the Table 2.

During the tests, the ambient temperature of the laboratory was in the range $(22 \pm 2) ^\circ\text{C}$, the relative humidity was in the range $(50 \pm 20)\%$ and the liquid depth Above the ear/grid reference points was above 15 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



Frequency (MHz)	Date	Tissue Type	Verification Kit	Probe S/N	Limit/Measured (Normalized to 1 W)	Deviation (%)
					Limit 1g (Normalized)	
2 450.0	2025-06-11	HSL	D2450V2 SN: 1091	EX3DV4 SN: 7772	51.40 \pm 10 % (46.26~56.54)	3.31
					53.10	
5 800.0	2025-06-10	HSL	D5GHzV2 SN: 1293	EX3DV4 SN: 7772	81.00 \pm 10 % (72.90~89.10)	-2.84
					78.70	

<Table 2. System Verification>

9. SAR Test Results


9.1 Standalone Body SAR Test Results

WLAN 2.4 GHz											
Mode	EUT Position	Distance (mm)	Frequency (MHz)	Measured Conducted Power (dBm)	Max. Tune-up Power (dBm)	Power Scaling Factor	Duty Cycle Compensate Factor	AreaScan Max SAR (W/kg)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)	Plot No.
802.11b	Front	5	2 437.0	15.82	17.00	1.312	1.008	0.059	0.059	0.078	
	Rear	5	2 437.0	15.82	17.00	1.312	1.008	0.738	0.774	1.024	
	Rear	5	2 462.0	15.69	17.00	1.352	1.008	0.803	0.824	1.123	1
	Right	5	2 437.0	15.82	17.00	1.312	1.008	0.041	-	-	
	Bottom	5	2 437.0	15.82	17.00	1.312	1.008	0.783	0.828	1.095	
	Bottom	5	2 462.0	15.69	17.00	1.352	1.008	0.780	0.809	1.103	
	Repeated SAR test										
	Bottom	5	2 437.0	15.82	17.00	1.312	1.008	0.809	0.824	1.090	

U-NII-3											
Mode	EUT Position	Distance (mm)	Frequency (MHz)	Measured Conducted Power (dBm)	Max. Tune-up Power (dBm)	Power Scaling Factor	Duty Cycle Compensate Factor	AreaScan Max SAR (W/kg)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)	Plot No.
802.11ac (VHT80)	Front	5	5 775.0	11.47	12.50	1.268	1.079	0.052	-	-	
	Rear	5	5 775.0	11.47	12.50	1.268	1.079	0.867	0.896	1.226	2
	Right	5	5 775.0	11.47	12.50	1.268	1.079	0.000	-	-	
	Bottom	5	5 775.0	11.47	12.50	1.268	1.079	0.373	0.369	0.505	
	Repeated SAR test										
	Rear	5	5 775.0	11.47	12.50	1.268	1.079	0.791	0.882	1.207	

General Notes:

- According to test procedures specified in IEEE1528-2013 and FCC KDB publication 447498 D01v06, the DUT was tested in all operating configurations, but only worst-case SAR values were reported
- Only standard batteries were used for all tests and fully charged.
- The depth of tissue-equivalent liquids in the phantom was at least 15cm.
- The manufacturer guarantees that the tested devices have same physical, mechanical and thermal characteristics and meet the requirements for expected operational tolerances.
- Measured SAR values were scaled up by applying the power scaling factor to comply FCC KDB publication 447498 D01v06

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WLAN Notes:

1. According to KDB publication 248227 D01v02r02, the channel with the highest measured output power of DSSS was selected for WLAN SAR test and OFDM modes (WLAN 2.4 GHz 802.11g/n) was not required due to the maximum allowed powers and the highest reported DSSS SAR.
2. The device was 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. The reported SAR was scaled to the 100% transmission duty factor to determine compliance.
3. When the same transmission mode configurations have the same maximum output power on the same channel for the 802.11 a/g/n/ac modes, the channel in the lower order/sequence 802.11 mode (i.e. a, g, n then ac) is selected.
4. When the maximum reported 1g averaged SAR is ≤ 0.8 W/kg, SAR testing on additional channels was not required. Otherwise, SAR for the next highest output power channel was required until the reported SAR result was ≤ 1.20 W/kg for 1g evaluations or all test channels were measured.
5. When the reported SAR of the initial test position is ≤ 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 combinations within the frequency band or aggregated band.
6. 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 ≤ 0.8 W/kg or all required test positions are tested.
7. During the test, the WLAN transmission was monitored through the spectrum analyzer.

10. Simultaneous Transmission

The following procedures adopted from FCC KDB Publication 447498 D01v06 are applicable to devices with built in unlicensed transmitters such as 802.11 and Bluetooth devices which may simultaneously transmit with the licensed transmitter.

This device contains transmitters that may operate simultaneously. Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication 447498 D01v06 4.3.2 and IEEE 1528-2013 Section 6.3.4.1.2, simultaneous transmission SAR test exclusion may be applied when the sum of the 1g or 10g SAR for all the simultaneous transmitting antennas in a specific a physical test configuration is within SAR limits. The different test positions in an exposure condition may be considered collectively to determine SAR test exclusion according to the sum of 1g or 10g SAR.

10.1 #Simultaneous Transmission Configurations

No.	Scenario	Operation
1	WLAN 2.4 GHz + Bluetooth	Yes
2	WLAN 5 GHz + Bluetooth	Yes
3	WLAN 2.4 GHz + WLAN 5 GHz	No

10.2 Estimated SAR

When standalone SAR is not required to be measured, per FCC KDB 447498 D01v06 4.3.2 b), the following equation must be used to estimate the standalone 1g or 10g SAR for simultaneous transmission assessment involving that transmitter.

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

Mode	Position	Frequency	Maximum Allowed Power	Separation Distance	Estimated 1g SAR
		MHz	mW	mm	W/kg
U-NII-1	Body	5 240.0	5	5	0.305
Bluetooth	Body	2 480.0	2	5	0.084
Bluetooth LE	Body	2 480.0	3	5	0.126

Note:

- Bluetooth SAR was not required to be measured per FCC KDB Publication 447498 D01v06.
- Estimated SAR results were used in the above table to determine simultaneous transmission SAR test exclusion.

10.3 Simultaneous Transmission Analysis

Exposure Condition /Position		WLAN 2.4 GHz	U-NII	Bluetooth	Summation	
		[①]	[②]	[③]	[①]+ [③]	[②]+ [③]
Body	Front	1.123	1.226	0.126	1.249	1.352
	Rear	1.123	1.226	0.126	1.249	1.352
	Right	1.123	1.226	0.126	1.249	1.352
	Bottom	1.103	0.505	0.126	1.229	0.631

11. SAR Measurement Variability

Per FCC KDB Publication 865664 D01v01r04, SAR measurement variability was assessed for each frequency band, which was determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. When both head and body tissue-equivalent media were required for SAR measurements in a frequency band, the variability measurement procedures were applied to the tissue medium with the highest measured SAR, using the highest measured SAR configuration for that tissue-equivalent medium. These additional measurements were repeated after the completion of all measurements requiring the same head or body tissue equivalent medium in a frequency band. The test device was returned to ambient conditions (normal room temperature) with the battery fully charged before it was re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

SAR Measurement Variability was assessed using the following procedures for each frequency band:



- 1) Repeated measurements are not required when the original highest measured SAR is < 0.80 W/kg.
- 2) **When the original highest measured SAR is ≥ 0.80 W/kg, the measurement was repeated once.**
- 3) A second repeated measurement was performed only if the ratio of largest to smallest SAR for the original and first repeated measurements was > 1.20 or when the original or repeated measurement was ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 4) A third repeated measurement was performed only if the original, first or second repeated measurement was ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

Band	Mode	EUT Position	Separation Distance (mm)	Frequency (MHz)	Measured 1 g SAR (W/kg)	Repeated 1g SAR (W/kg)	Ratio
WLAN 2.4GHz	802.11b	Bottom	5	2 437.0	0.828	0.824	1.00
U-NII-3	802.11ac (VHT80)	Rear	5	5 775.0	0.896	0.882	1.02

12. Measurement Uncertainty

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, when the highest measured 1-g SAR within a frequency band is $< 1.5 \text{ W/kg}$ and the measured 10-g SAR within a frequency band is $< 3.75 \text{ W/kg}$. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Standard 1528-2013 is not required in SAR reports submitted for equipment approval. For this device, the highest measured 1-g SAR is less 1.5 W/kg and highest measured 10-g SAR is less 3.75 W/kg . Therefore, the measurement uncertainty table is not required in this report.



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13. Test Equipment Information

Test Platform	SPEAG DASY5 System			
Version	DASY52: 52.10.4.1535 / SEMCAD: 14.6.14 (7501)			
Location	Eurofins KCTL Co.,Ltd. 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, Korea			
Manufacture	SPEAG			
Hardware Reference				
Equipment	Model	Serial Number	Date of Calibration	Due date of next Calibration
Shield Room	-	8F - 4	-	-
DASY6 Robot	TX60 Lspeag	F/19/0007289/A/001	-	-
Phantom	Twin SAM Phantom	1984	-	-
Mounting Device	Mounting Device	-	-	-
DAE	DAE4	666	2025-01-21	2026-01-21
Probe	EX3DV4	7772	2024-09-23	2025-09-23
MICROWAVE GENERATOR	SMP02	100295	2024-12-12	2025-12-12
Dual Power Meter	EPM-442A	GB37480680	2025-04-24	2026-04-24
Power Sensor	8481H	2703A11902	2025-04-24	2026-04-24
	8481H	3318A18090	2025-04-24	2026-04-24
Attenuator	PE7005-10	2228-4	2025-01-17	2026-01-17
	PE7005-10	2228-5	2024-12-11	2025-12-11
	PE7005-10	2228-6	2024-12-11	2025-12-11
Power Amplifier	AMP2027ADB	10005	2025-04-24	2026-04-24
Dual Directional Coupler	772D	2839A160504	2025-04-24	2026-04-24
Low Pass Filter	VLF-3000+	31831	2025-04-24	2026-04-24
	VLF-6000+	31838	2025-04-24	2026-04-24
Dipole Validation Kits	D2450V2	1091	2024-09-13	2026-09-13
	D5GHzV2	1293	2025-01-17	2027-01-17
ENA Series Network Analyzer	E5071B	MY42403524	2025-02-10	2026-02-10
Dielectric Assessment Kit	DAK-3.5	1078	2025-05-26	2026-05-26
Humidity/Temp	MHB-382SD	46301	2025-02-14	2026-02-14
Spectrum Analyzer	FSP7	100289	2024-12-11	2025-12-11

14. Test System Verification Results

Date: 2025-06-11

Test Laboratory: Eurofins KCTL Co.,Ltd.

File Name: [2450 MHz Verification Input Power 100 mW 2025-06-11.da53:0](#)

DUT: Dipole 2450 MHz D2450V2, Type: D2450V2, Serial: D2450V2 - SN:1091

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

Medium parameters used: $f = 2450$ MHz; $\sigma = 1.846$ S/m; $\epsilon_r = 39.546$; $\rho = 1000$ kg/m³

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7772;ConvF(6.65, 6.54, 6.97) @ 2450 MHz; Calibrated: 2024-09-23
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn666; Calibrated: 2025-01-21
- Phantom: Twin-SAM V8.0_Left; Type: QD 000 P41 Ax; Serial: 1984
- Measurement SW: DASY52, Version 52.10 (4);

Configuration/2450 MHz Verification Input Power 100 mW 2025-06-11/Area Scan (11x11x1):

Measurement grid: dx=12mm, dy=12mm

Maximum value of SAR (measured) = 8.53 W/kg

Configuration/2450 MHz Verification Input Power 100 mW 2025-06-11/Zoom Scan (7x7x7)/Cube 0:

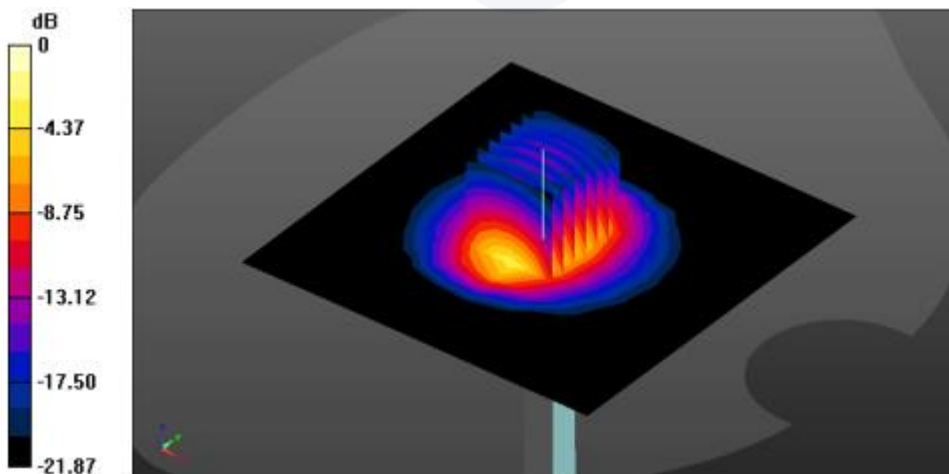
Measurement grid: dx=5mm, dy=5mm, dz=5mm

Reference Value = 71.65 V/m; Power Drift = 0.10 dB

Peak SAR (extrapolated) = 10.6 W/kg

SAR(1 g) = 5.31 W/kg; SAR(10 g) = 2.47 W/kg

Maximum value of SAR (measured) = 8.77 W/kg



0 dB = 8.77 W/kg = 9.43 dBW/kg

Date: 2025-06-10

Test Laboratory: Eurofins KCTL Co.,Ltd.

File Name: [5800 MHz Verification Input Power 100 mW 2025-06-10.da5:0](#)

DUT: Dipole D5GHzV2, Type: D5GHzV2, Serial: D5GHzV2 - SN:1293

Communication System: UID 0, CW (0); Frequency: 5800 MHz; Duty Cycle: 1:1
Medium parameters used: $f = 5800 \text{ MHz}$; $\sigma = 5.216 \text{ S/m}$; $\epsilon_r = 34.519$; $\rho = 1000 \text{ kg/m}^3$
Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7772;ConvF(4.72, 4.64, 4.95) @ 5800 MHz; Calibrated: 2024-09-23
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn666; Calibrated: 2025-01-21
- Phantom: Twin-SAM V8.0_Left; Type: QD 000 P41 Ax; Serial: 1984
- Measurement SW: DASY52, Version 52.10 (4);

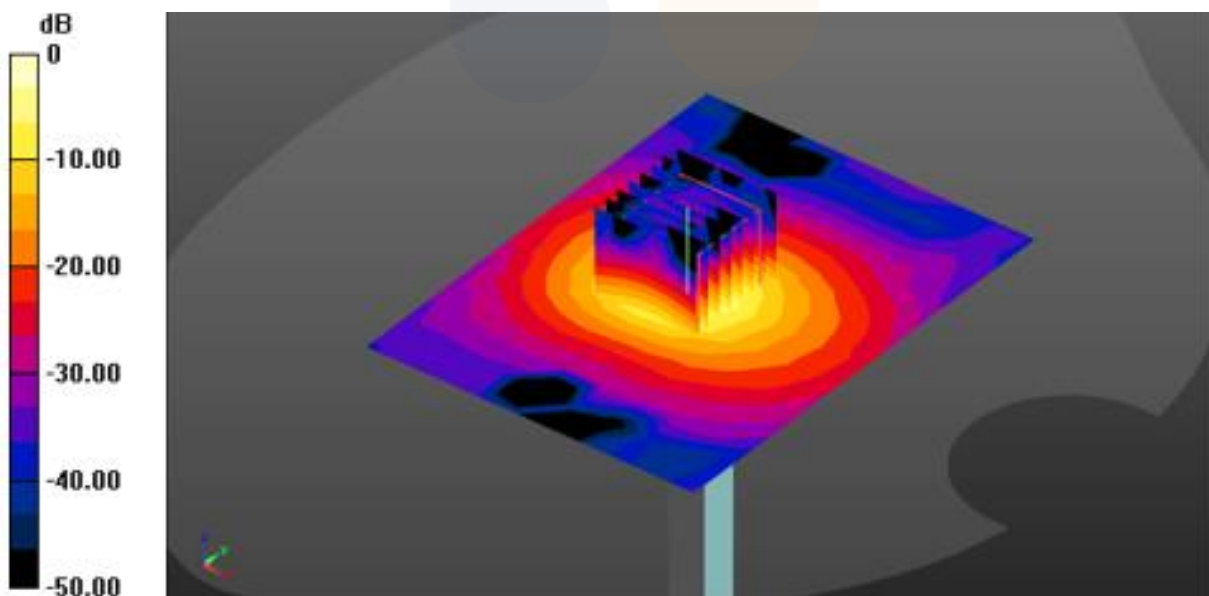
Configuration/5800 MHz Verification Input Power 100 mW 2025-06-10/Area Scan (10x13x1):

Measurement grid: $dx=10\text{mm}$, $dy=10\text{mm}$
Maximum value of SAR (measured) = 18.2 W/kg

Configuration/5800 MHz Verification Input Power 100 mW 2025-06-10/Zoom Scan (8x8x7)/Cube 0:

Measurement grid: $dx=4\text{mm}$, $dy=4\text{mm}$, $dz=1.4\text{mm}$
Reference Value = 64.58 V/m; Power Drift = 0.08 dB
Peak SAR (extrapolated) = 42.6 W/kg
SAR(1 g) = 7.87 W/kg; SAR(10 g) = 2.2 W/kg

Maximum value of SAR (measured) = 21.4 W/kg



0 dB = 21.4 W/kg = 13.30 dBW/kg

15. Test Results

1)

Date: 2025-06-11

Test Laboratory: Eurofins KCTL Co.,Ltd.

File Name: [1.WLAN 2.4G Body FCC Target change.da53:0](#)

DUT: PPF51, Type: Music Player, Serial: TP-072

Communication System: UID 0, 2.4GWLAN (0); Frequency: 2462 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 2462 \text{ MHz}$; $\sigma = 1.855 \text{ S/m}$; $\epsilon_r = 39.554$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7772;ConvF(6.65, 6.54, 6.97) @ 2462 MHz; Calibrated: 2024-09-23
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn666; Calibrated: 2025-01-21
- Phantom: Twin-SAM V8.0_Left; Type: QD 000 P41 Ax; Serial: 1984
- Measurement SW: DASY52, Version 52.10 (4);

Configuration/802.11b_CH11_Rear 5 mm/Area Scan (13x14x1): Measurement grid: $dx=12\text{mm}$, $dy=12\text{mm}$
Maximum value of SAR (measured) = 1.17 W/kg

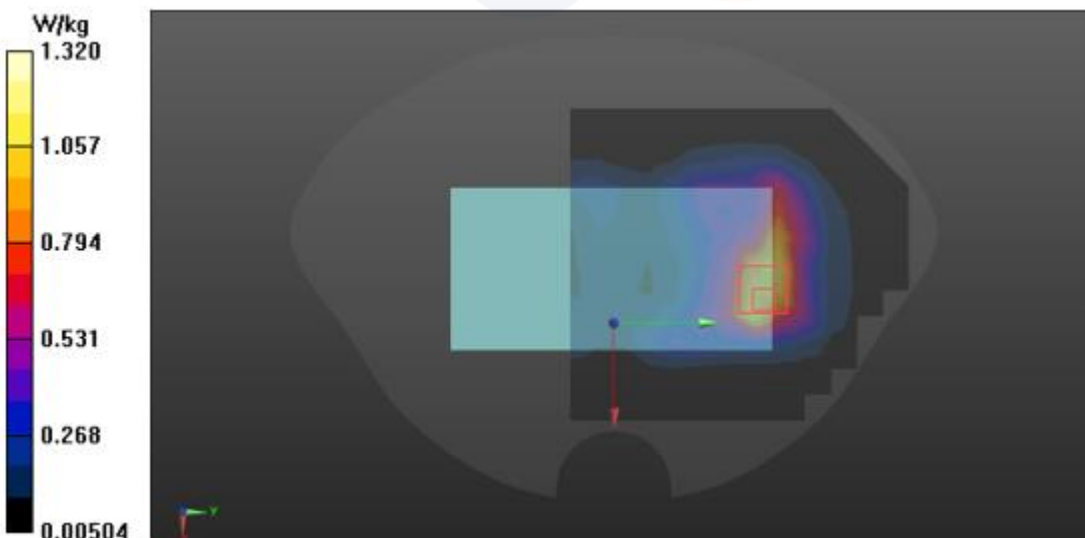
Configuration/802.11b_CH11_Rear 5 mm/Zoom Scan (10x8x7)/Cube 0: Measurement grid: $dx=5\text{mm}$, $dy=5\text{mm}$, $dz=5\text{mm}$

Reference Value = 9.416 V/m; Power Drift = 0.05 dB

Peak SAR (extrapolated) = 1.67 W/kg

SAR(1 g) = 0.824 W/kg; SAR(10 g) = 0.413 W/kg

Maximum value of SAR (measured) = 1.32 W/kg



2)

Date: 2025-06-10

Test Laboratory: Eurofins KCTL Co.,Ltd.

File Name: [1.WLAN 5.8G Body FCC PLS change.da53:0](#)

DUT: PPF51, Type: Music Player, Serial: TP-072

Communication System: UID 0, 5GWLAN (0); Frequency: 5775 MHz; Duty Cycle: 1:1

Medium parameters used: $f = 5775 \text{ MHz}$; $\sigma = 5.184 \text{ S/m}$; $\epsilon_r = 34.578$; $\rho = 1000 \text{ kg/m}^3$

Phantom section: Flat Section

DASY5 Configuration:

- Probe: EX3DV4 - SN7772;ConvF(4.72, 4.64, 4.95) @ 5775 MHz; Calibrated: 2024-09-23
- Sensor-Surface: 1.4mm (Mechanical Surface Detection)
- Electronics: DAE4 Sn666; Calibrated: 2025-01-21
- Phantom: Twin-SAM V8.0_Left; Type: QD 000 P41 Ax; Serial: 1984
- Measurement SW: DASY52, Version 52.10 (4);

Configuration/802.11ac_VHT80_CH155_Rear 5 mm/Area Scan (13x15x1): Measurement grid:

$dx=10\text{mm}$, $dy=10\text{mm}$

Maximum value of SAR (measured) = 1.96 W/kg

Configuration/802.11ac_VHT80_CH155_Rear 5 mm/Zoom Scan (9x9x7)/Cube 0: Measurement grid:

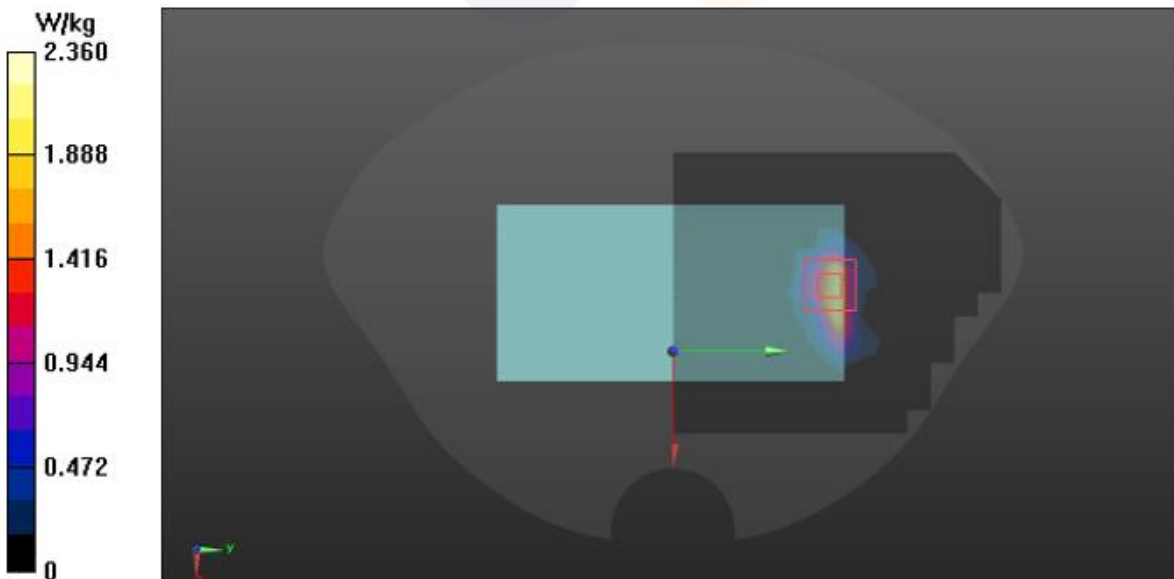
$dx=4\text{mm}$, $dy=4\text{mm}$, $dz=1.4\text{mm}$

Reference Value = 16.54 V/m; Power Drift = 0.09 dB

Peak SAR (extrapolated) = 4.56 W/kg

SAR(1 g) = 0.896 W/kg; SAR(10 g) = 0.260 W/kg

Maximum value of SAR (measured) = 2.36 W/kg



Appendixes List

Appendix A	A.1 Probe Calibration certificate (EX3DV4_7772) A.2 Dipole Calibration certificate (D2450V2_1091) A.3 Dipole Calibration certificate (D5GHzv2_1293)
Appendix B	SAR Tissue Specification
Appendix C	#Antenna Location & Distance
Appendix D	EUT Photo
Appendix E	Test Setup Photo

