SAR EVALUATION REPORT

FCC 47 CFR § 2.1093
IEEE Std. 1528-2013

For
Bluetooth Headset

MODEL NUMBER: OTE990

Report Number: 4791432944-1-SAR-1

FCC ID: BCE-OTE990

Issue Date: August 29, 2024

Prepared for
GN Audio USA Inc.
900 Chelmsfort St, Tower 2, Floor 8 Lowell, Massachusetts 01851 United States

Prepared by
UL Verification Services (Guangzhou) Co., Ltd, Song Shan Lake Branch
Building 10, Innovation Technology Park, No. 1, Li Bin Road, Song Shan Lake Hi-Tech Development Zone Dongguan, People's Republic of China

Tel: +86 769 22038881
Fax: +86 769 33244054
Website: www.ul.com

Revision History

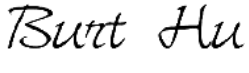
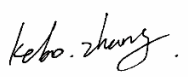
Rev.	Date	Revisions	Revised By
V1.0	August 29, 2024	Initial Issue	\

Note:

1. The Measurement result for the sample received is<Pass> according to < < IEEE Std. 1528> when <Accuracy Method> decision rule is applied.
2. This report is only published to and used by the applicant, and it is not for evidence purpose in China.

Table of Contents

1. Attestation of Test Results

Applicant Name	GN Audio USA Inc.	
Address	900 Chelmsfort St, Tower 2, Floor 8 Lowell, Massachusetts 01851 United States	
Manufacturer	GN Audio A/S	
Address	Lautrupbjerg 7 Ballerup DK-2750 Denmark	
EUT Name	Bluetooth Headset	
Brand:	Jabra	
Model	OTE990	
Sample Status	Normal	
Sample Received Date	August 7, 2024	
Date of Tested	August 27, 2024	
Applicable Standards	FCC 47 CFR § 2.1093 IEEE Std. 1528-2013 KDB publication	
SAR Limits (W/Kg)		
Exposure Category	Peak spatial-average (1g of tissue)	Extremities (hands, wrists, ankles, etc.) (10g of tissue)
General population / Uncontrolled exposure	1.6	4
Occupational / Controlled exposure	8	20
The Highest Reported SAR (W/kg)		
RF Exposure Conditions	**Equipment Class**	
	DSS	
Head (0mm)	0.064	
Simultaneous Transmission (1-g)	/	
Test Results	Pass	
Prepared By:  Burt Hu Laboratory Engineer	Reviewed By:  Kebo Zhang Senior Project Engineer	Approved By:  Stephen Guo Laboratory Manager

2. Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with IEEE Std.1528-2013, the following FCC Published RF exposure KDB procedures:

- 447498 D04 Interim General RF Exposure Guidance v01
- 690783 D01 SAR Listings on Grants
- 865664 D01 SAR measurement 100 MHz to 6 GHz
- 865664 D02 RF Exposure Reporting

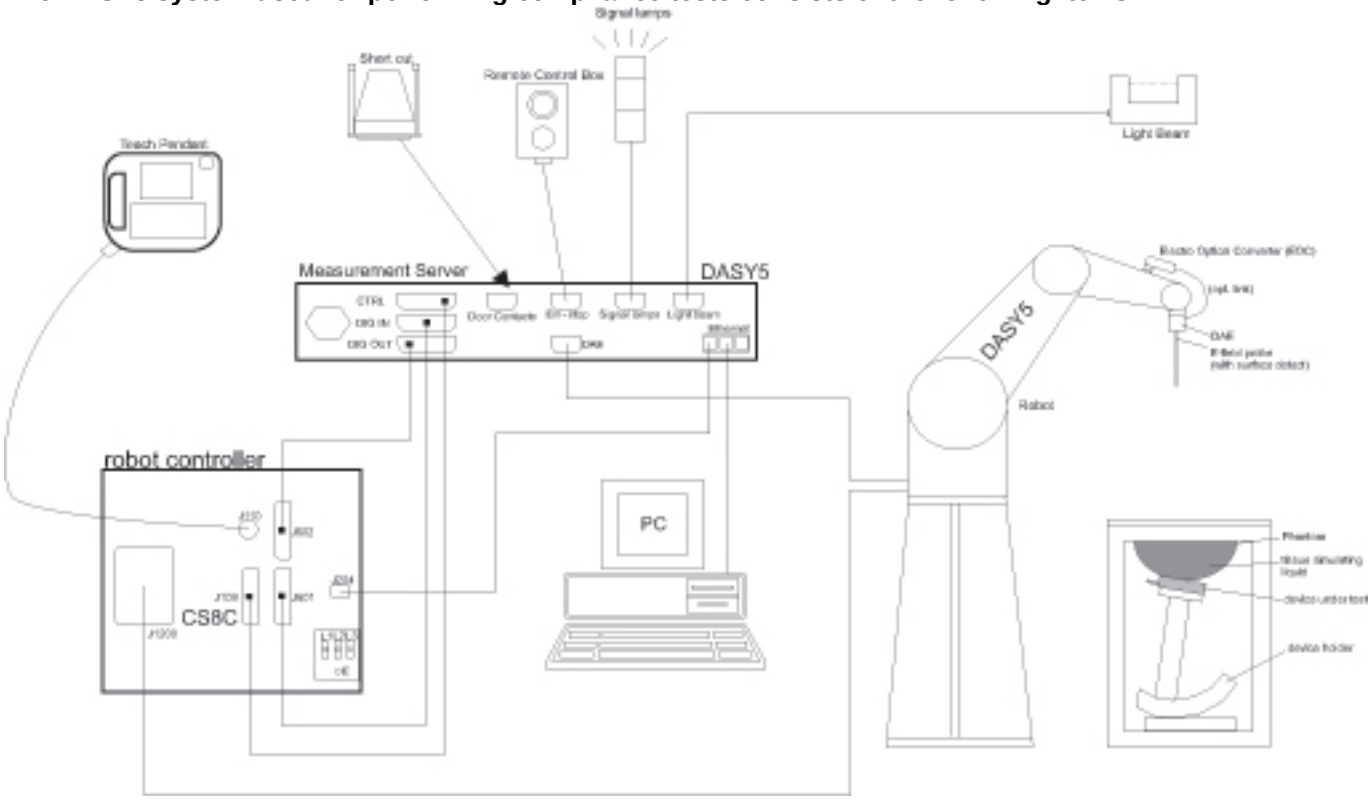
3. Facilities and Accreditation

Test Location	UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch.
Address	Building 10, Innovation Technology Park, Song Shan Lake Hi-tech Development Zone, Dongguan, 523808, China
Accreditation Certificate	**A2LA (Certificate No.: 4102.01)** UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. has been assessed and proved to be in compliance with A2LA. **FCC (FCC Designation No.: CN1187)** UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. Has been recognized to perform compliance testing on equipment subject to the Commission's Delcaration of Conformity (DoC) and Certification rules. **ISED (Company No.: 21320)** UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. has been registered and fully described in a report filed with ISED. The Company Number is 21320 and the test lab Conformity Assessment Body Identifier (CABID) is CN0046. **VCCI (Registration No.: G-20192, C-20153, T-20155 and R-20202)** UL Verification Services (Guangzhou) Co., Ltd. Song Shan Lake Branch. has been assessed and proved to be in compliance with VCCI, the Membership No. is 3793. Facility Name: Chamber D, the VCCI registration No. is G-20192 and R-20202. Shielding Room B, the VCCI registration No. is C-20153 and T-20155.
Description	All measurement facilities use to collect the measurement data are located at Building 10, Innovation Technology Park, Song Shan Lake Hi-tech Development Zone, Dongguan, 523808, China.

4. SAR Measurement System & Test Equipment

4.1. SAR Measurement System

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



- A standard high precision 6-axis robot with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- An isotropic Field probe optimized and calibrated for the targeted measurement.
- A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, AD-conversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.
- The Electro-optical converter (EOC) performs the conversion from optical to electrical signals for the digital communication to the DAE. To use optical surface detection, a special version of the EOC is required. The EOC signal is transmitted to the measurement server.
- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- A computer running Win7 and the DASY5 software.
- Remote control and teach pendant as well as additional circuitry for robot safety such as warning lamps, etc.
- The phantom, the device holder and other accessories according to the targeted measurement.

4.2. 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 2.1 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

The Area Scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum locations even in relatively coarse grids. When an Area Scan has measured all reachable points, it computes the field maximal found in the scanned area, within a range of the global maximum. The range (in dB) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE Standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan). 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 Parameters extracted from KDB 865664 D01 v01r04 SAR Measurement 100 MHz to 6 GHz

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 mm ± 1 mm	$½ \cdot \delta \cdot \ln(2)$ 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.	

Step 3: Zoom Scan

Zoom Scans are used to assess the peak spatial SAR values within a cubic averaging volume containing 1 g and 10 g of simulated tissue. The Zoom Scan measures points (refer to table below) within a cube whose base faces are centered on the maxima found in a preceding area scan job within the same procedure. When the measurement is done, the Zoom Scan evaluates the averaged SAR for 1 g and 10 g and displays these values next to the job's label.

Zoom Scan Parameters extracted from KDB 865664 D01 v01r04 SAR Measurement 100 MHz to 6 GHz

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: $\Delta z_{Zoom}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{Zoom}(1)$: 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
		$\Delta z_{Zoom}(n>1)$: between subsequent points	≤ 1.5·$\Delta z_{Zoom}(n-1)$ 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

Step 4: 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.

Step 5: Z-Scan (FCC only)

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

4.3. Test Equipment

The measuring equipment used to perform the tests documented in this report has been calibrated in accordance with the manufacturers' recommendations, and is traceable to recognized national standards.

Name of equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
ENA Network Analyzer	Keysight	E5080A	MY55100583	2024.10.11
Dielectric Probe kit	SPEAG	SM DAK 040 SA	1155	2025.02.27
DC power supply	Keysight	E36103A	MY55350020	2024.10.11
Signal Generator	Rohde & Schwarz	SMB100A	178553	2024.10.11
BI-Directional Coupler	KRYTAR	1850	54733	2024.10.11
Peak and Average Power Sensor	Keysight	E9325A	MY62220002	2024.10.11
Peak and Average Power Sensor	Keysight	E9325A	MY62220003	2024.10.11
Dual Channel PK Power Meter	Keysight	N1912A	MY55416024	2024.10.11
Amplifier	CORAD TECHNOLOGY LTD	AMF-4D-00400600-50-30P	1983561	NCR
Dosimetric E-Field Probe	SPEAG	EX3DV4	7733	2025.02.20
Data Acquisition Electronic	SPEAG	DAE4	1739	2025.01.22
Dipole Kit 2450 MHz	SPEAG	D2450V2	977	2024.12.16
Software	SPEAG	DASY52	N/A	NCR
Twin Phantom	SPEAG	SAM 5.0	1805	NCR
Thermometer	/	GX-138	150709653	2024.10.18
Thermometer	VICTOR	ITHX-SD-5	18470005	2024.10.18

Note:

1) As per KDB865664D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
   a) There is no physical damage on the dipole;
   b) System check with specific dipole is within 10% of calibrated value;
   c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement.
   d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.
2) Dielectric assessment kit is calibrated against air, distilled water and a shorting block performed before measuring liquid parameters.
3) NCR is short for "No Calibration Requirement".

5. Measurement Uncertainty

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

6. Device Under Test (DUT) Information

6.1. DUT Description

DUT is a head mounted Bluetooth headset with 2.4GHz Bluetooth wireless and NFC RX capabilities	
DUT Dimension	Overall (Length x Width x Height): 150.2 mm x 151.39mm x 67.31mm

6.2. Wireless Technology

Wireless technology	Frequency band
BT/BLE	2.4 GHz
NFC	13.56MHz

7. Conducted Output Power Measurement and tune-up tolerance

7.1. Power measurement result of Bluetooth

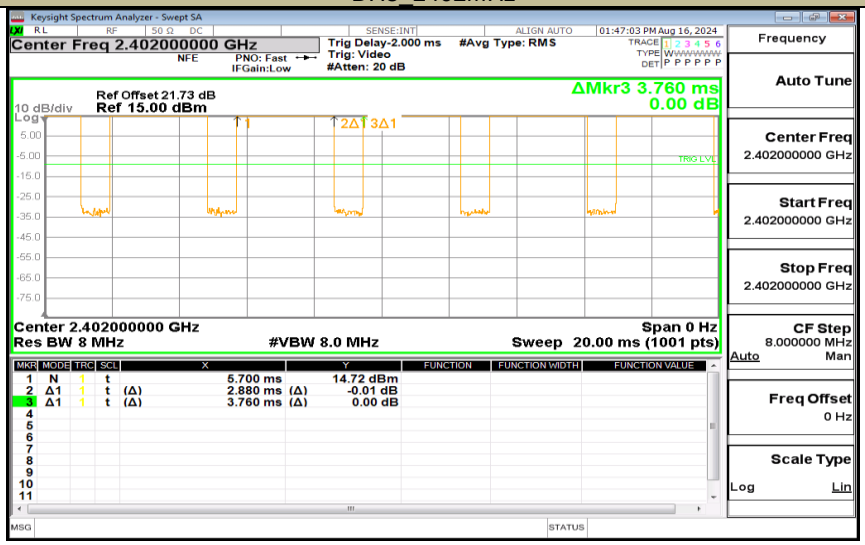
Band	Mode	Data Rate	Channel	Frequency	Avg Pwr(dBm)	Tune-up (dBm)
2.4GHz	Bluetooth	DH5	0	2402	10.81	11.0
			39	2441	10.16	
			78	2480	9.6	
		3DH5	0	2402	10.39	11.0
			39	2441	9.91	
			78	2480	9.41	
		LE 1M	0	2402	7.87	8.0
			19	2440	7.27	
			39	2480	6.58	
		LE 2M	0	2402	7.82	8.0
			19	2440	7.26	
			39	2480	6.60	

Note:
1) The output power of the device was set to transmit at maximum power for all tests.
2) As per KDB 447498 D04 at the maximum rated output power and within the tune-up tolerance range specified for the product, but not more than 2 dB lower than the maximum tune-up tolerance limit.
3) The maximum output power mode BT DH5 was selected as the primary mode to test SAR for Bluetooth mode. SAR measurement is not required for the other modes, when the secondary mode is ≤0.25 dB higher than the primary mode.

7.2. Duty Cycle

Test Mode	Duty Cycle (%)
DH5	76.60

DH5_2402MHz



8. RF Exposure Conditions (Test Configurations)

Antenna location detail referred to 4791432944-1-SAR-1_App A Photo

Wireless technologies	RF Exposure Conditions	DUT-to-User Separation
BT	Head	0 mm

Evaluation
Per FCC KDB 447498 D04 Appendix B:

Frequency (MHz)	Distance (mm)									
	5	10	15	20	25	30	35	40	45	50
300	39	65	88	110	129	148	166	184	201	217
450	22	44	67	89	112	135	158	180	203	226
835	9	25	44	66	90	116	145	175	207	240
1900	3	12	26	44	66	92	122	157	195	236
2450	3	10	22	38	59	83	111	143	179	219
3600	2	8	18	32	49	71	96	125	158	195
5800	1	6	14	25	40	58	80	106	136	169

For 2.4GHz BT DH5 1-g SAR

Test Mode	Frequency (MHz)	Power (dBm)	Power (mW)	Separation Distance (mm)	Threshold (mW)	SAR Test
BT DH5	2450	11	13	5.00	3	Required

9. SAR exclusion evaluation for NFC

The NFC of DUT only has RX function, so SAR evaluation testing is not required

10. Test Configurations

10.1. 2.4GHz BT/BLE SAR Test Requirements

2.4GHz BT operating modes are tested independently according to the service requirements in each frequency band for each antenna. DH5/3DH5/1M/2M SISO modes are tested on the maximum average output power mode.

11. Dielectric Property Measurements & System Check

11.1. Dielectric Property Measurements

The temperature of the tissue-equivalent medium used during measurement must also be within 18°C to 25°C and within ± 2°C of the temperature when the tissue parameters are characterized.
The dielectric parameters must be measured before the tissue-equivalent medium is used in a series of SAR measurements. The parameters should be re-measured after each 3 – 4 days of use; or earlier if the dielectric parameters can become out of tolerance; for example, when the parameters are marginal at the beginning of the measurement series.
Tissue dielectric parameters were measured at the low, middle and high frequency of each operating frequency range of the test device.

Tissue Dielectric Parameters

FCC KDB 865664 D01 v01r04 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head		Body	
	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
5000	36.2	4.45	49.3	5.07
5100	36.1	4.55	49.1	5.18
5200	36.0	4.66	49.0	5.30
5300	35.9	4.76	48.9	5.42
5400	35.8	4.86	48.7	5.53
5500	35.6	4.96	48.6	5.65
5600	35.5	5.07	48.5	5.77
5700	35.4	5.17	48.3	5.88
5800	35.3	5.27	48.2	6.00

IEEE Std 1528-2013
Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

Liquid	Freq.	Liquid Parameters				Deviation(%)		Limit (%)	Temp. (℃)	Test Date
		Measured		Target						
		ε_r	σ	ε_r	σ	ε_r	σ			
Head 2450	2360	39.420	1.735	39.36	1.72	0.15	0.87	±5	21.3	August 27, 2024
	2450	38.380	1.756	39.20	1.80	-2.09	-2.44			
	2540	38.220	1.824	39.09	1.90	-2.23	-4.00			

11.2. System Check

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

System Performance Check Measurement Conditions:

- The measurements were performed in the flat section of the TWIN SAM or ELI phantom, shell thickness: 2.0 ±0.2 mm (bottom plate) filled with Body or Head simulating liquid of the following parameters.
- The depth of tissue-equivalent liquid in a phantom must be ≥ 15.0 cm for SAR measurements ≤ 3 GHz and ≥ 10.0 cm for measurements > 3 GHz.
- The DASY system with an E-Field Probe was used for the measurements.
- The dipole was mounted on the small tripod so that the dipole feed point was positioned below the center marking of the flat phantom section and the dipole was oriented parallel to the body axis (the long side of the phantom). The standard measuring distance was 10mm (above 1GHZ) and 15mm (below 1GHz) from dipole center to the simulating liquid surface.
- For area scan, standard grid spacing for head measurements is 15 mm in x- and y- dimension(≤2GHz), 12 mm in x- and y-dimension (2-4 GHz) and 10mm in x- and y- dimension(4-6GHz).
- For zoom scan, Δ x_{zoom}, Δ y_{zoom}≤ 2GHz - ≤8mm, 2-4GHz - ≤5 mm and 4-6 GHz-≤4 mm; Δ z_{zoom} ≤3GHz - ≤5 mm, 3-4 GHz- ≤4 mm and 4-6 GHz-≤2 mm.
- Distance between probe sensors and phantom surface was set to 3 mm except for 5 GHz band. For 5GHz band, Distance between probe sensors and phantom surface was set to 2.5 mm
- The dipole input power (forward power) was set to 100 mW or 250 mW depend on the certificate of the dipoles.
- The results are normalized to 1 W input power.

System Check Results

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

T.S. Liquid		Measured Results		Target (Ref. value)	Delta (%)	Limit (%)	Temp. (℃)	Test Date
		Zoom Scan (W/Kg)	Normalize to 1W (W/Kg)					
Head 2450	1-g	5.270	52.70	53.20	-0.94	±10	21.3	August 27, 2024
	10-g	2.420	24.20	24.20	0.00			

12. Measured and Reported (Scaled) SAR Results

As per KDB 447498 D04 v01, When SAR or MPE is measured at or scaled to the maximum tune-up tolerance limit, the results are referred to as reported.

Scaled SAR calculation formula:

Scaled SAR = Tune-up in mW / Conducted power in mW * Duty cycle (if available) * SAR value

SAR Test Reduction criteria are as follows:

KDB 447498 D04 v01 General RF Exposure Guidance:
A）Per KDB447498 D04 v06, all SAR measurement results are scaled to the maximum tune-up tolerance limit to demonstrate SAR compliance.
B）Testing of other required channels within the operating mode of a frequency band is not required when the reported 1-g or 10-g SAR for the mid-band or highest output power channel is:

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

Per KDB865664 D01 v01r04:
For each frequency band, repeated SAR measurement is required only when the measured SAR is ≥0.8W/Kg; if the deviation among the repeated measurement is ≤ 20%, and the measured SAR <1.45W/Kg, only one repeated measurement is required.

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 ≤ 1.2 W/kg, SAR is not required for that subsequent test configuration.

13. Measured SAR Results

13.1. SAR Test Results of Bluetooth

Test Position (Head 0mm)	Test Mode	Channel/ Frequency	Power (dBm)		Measured SAR Value	Power Drift	Duty Cycle (%)	Scaled (W/Kg)
			Tune-up	Meas.	1-g (W/kg)			
Back side	BT DH5	0/2402	11.0	10.81	0.047	-0.01	76.60	0.064

Note:
1) The SAR testing was set to transmit at maximum power for all tests.

14. Simultaneous Transmission SAR Analysis

There is only one TX antenna, so simultaneous transmission does not exist.

Appendixes

Refer to separated files for the following appendixes.

4791432944-1-SAR-1_App A Photo

4791432944-1-SAR-1_App B System Check Plots

4791432944-1-SAR-1_App C Highest Test Plots

4791432944-1-SAR-1_App D Cal. Certificates

---------End of Report---------