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FCC ID: EMJKTPA-P010K

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## SAR TEST REPORT

**FCC 47 CFR § 2.1093  
IEEE Std 1528-2013**

for  
**Wireless Keyboard**

**Model Name.: TPA-P010K**

Prepared for:

**Primax Electronics Ltd.  
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Prepared by

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Issue Date: July 30, 2025**

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### **Revision History**

| Rev. | Issue Date    | Revisions     | Effect Page | Revised By |
|------|---------------|---------------|-------------|------------|
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## 1 Attestation of Test Results

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                      |      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|------|
| Applicant Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Primax Electronics Ltd.                                                              |      |
| Model Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | TPA-P010K                                                                            |      |
| Applicable Standards                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | FCC 47 CFR § 2.1093<br>Published RF exposure KDB procedures<br>IEEE Std 1528-2013    |      |
| Exposure Category                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | SAR Limits (W/Kg)                                                                    |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Peak spatial-average<br>(1g of tissue)                                               |      |
| General population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1.6                                                                                  |      |
| RF Exposure Conditions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Equipment Class - Highest Reported SAR (W/kg)                                        |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | SRD2.4G                                                                              | DTS  |
| Body                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 0.04                                                                                 | 0.02 |
| Receive EUT Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 6/23/2025                                                                            |      |
| Date Tested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 7/8/2025 to 7/21/2025                                                                |      |
| Test Results                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Pass                                                                                 |      |
| Compliance Certification Services Inc. , tested the above equipment in accordance with the requirements set forth in the above standards. Determination of compliance is based on the results of the compliance measurement,not taking into account measurement instrumentation uncertainty.All indications of Pass/Fail in this report are opinions expressed by Compliance Certification Services Inc, based on interpretations and/or observations of test results. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report. |                                                                                      |      |
| Approved & Released By:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Tested by:                                                                           |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |      |
| Sky Zhou<br>Asst. Section Manager<br>Compliance Certification Services Inc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | KW Huang<br>Engineer<br>Compliance Certification Services Inc.                       |      |



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## 2 Test Specification, Methods and Procedures

The tests documented in this report were performed in accordance with FCC 47 CFR § 2.1093, IEEE STD 1528- 2013, the following FCC Published RF exposure [KDB](#) procedures:

- 447498 D04 Interim General RF Exposure Guidance v01
- 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04
- 865664 D02 RF Exposure Reporting v01r02

In addition to the above, the following information was used:

- [TCB workshop](#) October, 2016; Page 7, RF Exposure Procedures (Bluetooth Duty Factor)



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### 3 Device Under Test (DUT) Information

#### 3.1 DUT Description

|                      |                                                                       |
|----------------------|-----------------------------------------------------------------------|
| Applicant Name       | Primax Electronics Ltd.                                               |
| Applicant Address    | No.669,Ruey Kuang Road,Neihu,Taipei,114, Taiwan, R.O.C.               |
| Manufacturer Name    | Primax Electronics Ltd.                                               |
| Manufacturer Address | No.669,Ruey Kuang Road,Neihu,Taipei,114, Taiwan, R.O.C.               |
| Product              | Wireless Keyboard                                                     |
| Trade Name           | hp                                                                    |
| Model No.            | TPA-P010K                                                             |
| Model Discrepancy    | N/A                                                                   |
| Device Dimension     | Overall (Length x Width): 428 mm x 121 mm<br>Overall Diagonal: 445 mm |
| Back Cover           | <input checked="" type="checkbox"/> Normal Battery Cover              |
| Battery Options      | <input checked="" type="checkbox"/> Alkaline battery                  |
| Hardware Version     | V01                                                                   |
| Software Version     | N/A                                                                   |
| Sample Stage         | PVT                                                                   |



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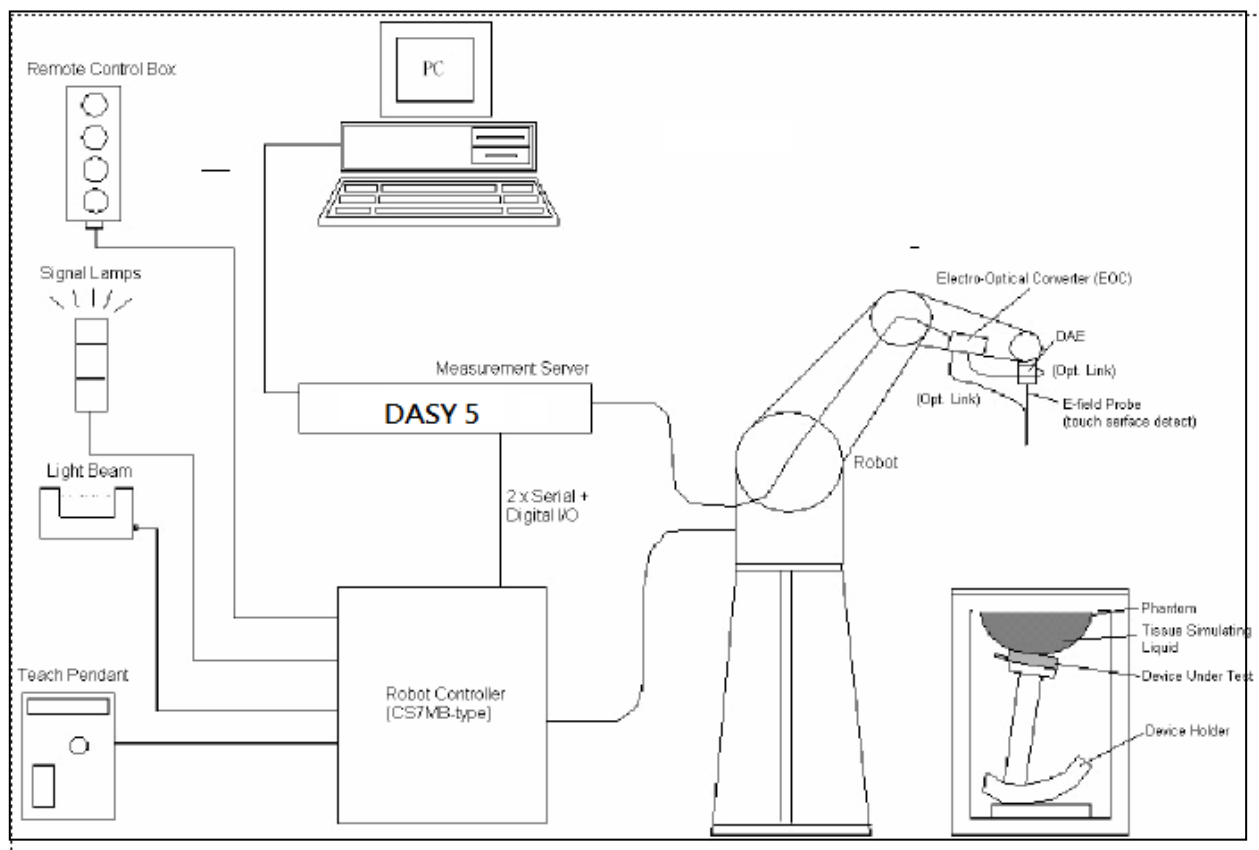
### 3.2 Wireless Technologies

| Wireless technologies | Frequency bands | Peak Antenna Gain (dBi) | Operating mode | Duty Cycle used for SAR testing |
|-----------------------|-----------------|-------------------------|----------------|---------------------------------|
| SRD2.4G               | 2.4 GHz         | 4.21                    | GFSK           | 63.41%                          |
| Antenna Specification | Brand Name      | Primax                  |                |                                 |
|                       | Type            | PCB Antenna             |                |                                 |
|                       | Parts Number    | TPA-P010K               |                |                                 |
| Bluetooth             | 2.4 GHz         | 4.23                    | LE             | 63.93%                          |
| Antenna Specification | Brand Name      | Primax                  |                |                                 |
|                       | Type            | PCB Antenna             |                |                                 |
|                       | Parts Number    | TPA-P010K               |                |                                 |

#### Notes:

1. The sample selected for test was prototype that representative to production product and was provided by manufacturer
2. Variant information between/among model numbers / trademarks is provided by the applicant, test results of this report are applicable to the sample EUT received of main test model name.
3. Antenna information is provided by the applicant, test results of this report are applicable to the sample EUT received

## 4 SAR Measurement System

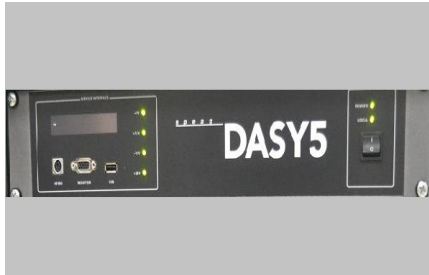


### The DASY5 system for performing compliance tests consists of the following items:

- A standard high precision 6-axis robot (Stäubli RX family) with controller, teach pendant and software. An arm extension for accommodating the data acquisition electronics (DAE).
- A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
- 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 between optical and electrical of the signals for the digital communication to the DAE and for the analog signal from the optical surface detection. The EOC is connected 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.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows 7 or Windows XP.
- DASY software version: NEO52 D10.3 S14.6.13.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand and right-hand usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing validating the proper functioning of the system.



## 4.1 System Components

| DASY5 Measurement Server                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <p>The DASY5 measurement server is based on a PC/104 CPU board with a 166MHz low-power Pentium, 32MB chip disk and 64MB RAM. The necessary circuits for communication with either the DAE4 electronic box as well as the 16-bit AD-converter system for optical detection and digital I/O interface are contained on the DASY5 I/O-board, which is directly connected to the PC/104 bus of the CPU board.</p> <p>The measurement server performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation.</p>                                                                                                                                                                          |
|   | <p>The PC-operating system cannot interfere with these time critical processes. All connections are supervised by a watchdog, and disconnection of any of the cables to the measurement server will automatically disarm the robot and disable all program-controlled robot movements. Furthermore, the measurement server is equipped with two expansion slots which are reserved for future applications. Please note that the expansion slots do not have a standardized pinout and therefore only the expansion cards provided by SPEAG can be inserted. Expansion cards from any other supplier could seriously damage the measurement server. Calibration: No calibration required.</p>                                                                    |
| Data Acquisition Electronics (DAE)                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|  | <p>The data acquisition electronics (DAE4) 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 mechanical probe mounting device includes two different sensor systems for frontal and sideways probe contacts. They are used for mechanical surface detection and probe collision detection. The input impedance of the DAE4 box is 200MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.</p> |

## EX3DV4 Isotropic E-Field Probe for Dosimetric Measurements



- Construction:** Symmetrical design with triangular core  
Built-in shielding against static charges  
PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
- Calibration:** Basic Broad Band Calibration in air: 10-3000 MHz.  
Conversion Factors (CF) for HSL 900 and HSL 1800  
CF-Calibration for other liquids and frequencies upon request.
- Frequency:** 10 MHz to > 6 GHz; Linearity:  $\pm 0.2$  dB (30 MHz to 3 GHz)
- Directivity:**  $\pm 0.3$  dB in HSL (rotation around probe axis)  
 $\pm 0.5$  dB in HSL (rotation normal to probe axis)
- Dynamic Range:** 10  $\mu$ W/g to > 100 mW/g; Linearity:  $\pm 0.2$  dB  
(noise: typically < 1  $\mu$ W/g)
- Dimensions:** Overall length: 330 mm (Tip: 20 mm)  
Tip diameter: 2.5 mm (Body: 12 mm)  
Distance from probe tip to dipole centers: 1 mm
- Application:** High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields).  
Only probe which enables compliance testing for frequencies up to 6 GHz with precision of better 30%.

## SAM Phantom



- Construction:** The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE1528: 2013. It enables the dosimetric evaluation of left and right hand phone usage as well as body mounted usage at the flat phantom region. A cover prevents evaporation of the liquid. Reference markings on the phantom allow the complete setup of all predefined phantom positions and measurement grids by manually teaching three points with the robot.
- Shell Thickness:**  $2 \pm 0.2$  mm
- Filling Volume:** Approx. 25 liters
- Dimensions:** Height: 810mm; Length: 1000mm; Width: 500mm

## ELI Phantom



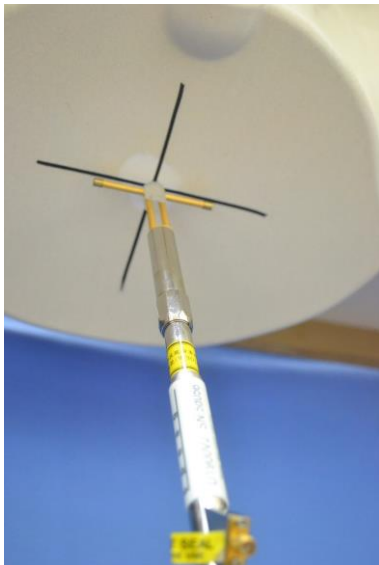
- Construction:** Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI4 is fully compatible with the latest draft of the standard IEEE1528: 2013 and all known tissue simulating liquids. ELI4 has been optimized regarding its performance and can be integrated into our standard phantom tables. A cover prevents evaporation of the liquid. Reference markings on the phantom allow installation of the complete setup, including all predefined phantom positions and measurement grids, by teaching three points. The phantom is supported by software version DASY5 and higher and is compatible with all SPEAG dosimetric probes and dipoles
- Shell Thickness:**  $2.0 \pm 0.2$  mm (sagging: <1%)
- Filling Volume:** Approx. 25 liters
- Dimensions:** Major ellipse axis: 600 mm  
Minor axis: 400 mm 500mm

## Device Holder for SAM Twin Phantom



**Construction:** In combination with the Twin SAM Phantom V4.0 or Twin SAM, the Mounting Device (made from POM) enables the rotation of the mounted transmitter in spherical coordinates, whereby the rotation point is the ear opening. The devices can be easily and accurately positioned according to IEC, IEEE, CENELEC, FCC or other specifications. The device holder can be locked at different phantom locations (left head, right head, and flat phantom).

## System Validation Kits for SAM Phantom



**Construction:** Symmetrical dipole with 1/4 balun Enables measurement of feedpoint impedance with NWA Matched for use near flat phantoms filled with brain simulating solutions Includes distance holder and tripod adaptor.

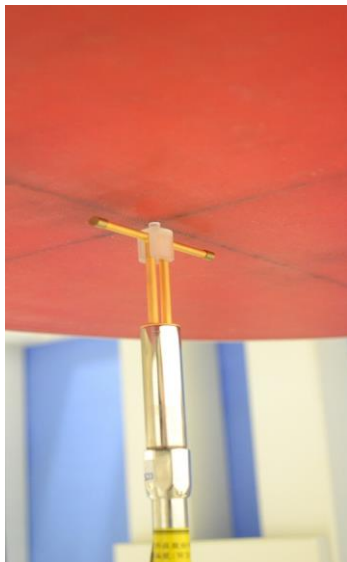
**Frequency:** 2450, 5300, 5600, 5800 MHz

**Return loss:** > 20 dB at specified validation position

**Power capability:** > 100 W (f < 1GHz); > 40 W (f > 1GHz)

**Dimensions:** D2450V2: dipole length: 51.5 mm; overall height: 290 mm  
D5GHzV2: dipole length: 20.6 mm; overall height: 300 mm

## System Validation Kits for ELI phantom



**Construction:** Symmetrical dipole with 1/4 balun Enables measurement of feedpoint impedance with NWA Matched for use near flat phantoms filled with brain simulating solutions Includes distance holder and tripod adaptor.

**Frequency:** 2450, 5300, 5600, 5800 MHz

**Return loss:** > 20 dB at specified validation position

**Power capability:** > 100 W (f < 1GHz); > 40 W (f > 1GHz)

**Dimensions:** D2450V2: dipole length: 51.5 mm; overall height: 290 mm  
D5GHzV2: dipole length: 20.6 mm; overall height: 300 mm



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## 4.2 SAR Scan Procedures

### Step 1: Power Reference Measurement

The reference and drift jobs are useful jobs for monitoring the power drift of the device under test in the batch process. Both jobs measure the field at a specified reference position, at a selectable distance from the phantom surface. The reference position can be either the selected section's grid reference point or a user point in this section. The reference job projects the selected point onto the phantom surface, orients the probe perpendicularly to the surface, and approaches the surface using the selected detection method.

### 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 IEEE1528 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 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 | $5 \pm 1$ mm                                                                                                                                                                                                                                                           | $\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm |
| Maximum probe abgle from probe axis to phantom surface normal at the measurement location              | $30^\circ \pm 1^\circ$                                                                                                                                                                                                                                                 | $20^\circ \pm 1^\circ$                             |
| Maximum area scan spatial resolution: $\Delta x_{\text{Zoom}}$ , $\Delta y_{\text{Zoom}}$              | $\leq 2$ GHz: $\leq 15$ mm<br>2 – 3 GHz: $\leq 12$ mm                                                                                                                                                                                                                  | 3 – 4 GHz: $\leq 12$ mm<br>4 – 6 GHz: $\leq 10$ 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 $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device. |                                                    |



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### 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 SAR Measurement 100 MHz to 6 GHz

|                                                                                        |                                           |                                                                                             | ≤ 3 GHz                                                                                                                       | > 3 GHz                                                                                                                      |
|----------------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$ |                                           |                                                                                             | $\leq 2 \text{ GHz}: \leq 8 \text{ mm}$<br>$2 - 3 \text{ GHz}: \leq 5 \text{ mm}$                                             | $3 - 4 \text{ GHz}: \leq 5 \text{ mm}$<br>$4 - 6 \text{ GHz}: \leq 4 \text{ mm}$                                             |
| Maximum zoom scan spatial resolution, normal to phantom surface                        | Uniform grid: $\Delta z_{\text{Zoom}}(n)$ |                                                                                             | $\leq 5 \text{ mm}$                                                                                                           | $3 - 4 \text{ GHz}: \leq 4 \text{ mm}$<br>$4 - 5 \text{ GHz}: \leq 3 \text{ mm}$<br>$5 - 6 \text{ GHz}: \leq 2 \text{ mm}$   |
|                                                                                        | graded grid                               | $\Delta z_{\text{Zoom}}(1)$ : between 1 <sup>st</sup> two points closest to phantom surface | $\leq 4 \text{ mm}$                                                                                                           | $3 - 4 \text{ GHz}: \leq 3 \text{ mm}$<br>$4 - 5 \text{ GHz}: \leq 2.5 \text{ mm}$<br>$5 - 6 \text{ GHz}: \leq 2 \text{ mm}$ |
|                                                                                        |                                           | $\Delta z_{\text{Zoom}}(n>1)$ : between subsequent points                                   | $\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$                                                                                  |                                                                                                                              |
| Maximum zoom scan volume                                                               | x, y, z                                   | $\geq 30 \text{ mm}$                                                                        | $3 - 4 \text{ GHz}: \geq 28 \text{ mm}$<br>$4 - 5 \text{ GHz}: \geq 25 \text{ mm}$<br>$5 - 6 \text{ GHz}: \geq 22 \text{ mm}$ |                                                                                                                              |

### 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



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## 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  $\leq 30\%$ , for a confidence interval of  $k = 2$ . If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE1528: 2013 is not required in SAR reports submitted for equipment approval.

Therefore, the measurement uncertainty is not required.



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## 6 RF Exposure Conditions (Test Configurations)

Refer to Appendixes 1 for the specific details of the antenna-to-antenna and antenna-to-edge(s) distances.

### 6.1 Standalone SAR Test Exclusion Considerations

Since the Dedicated Host Approach is applied, the SAR-based exemption in Appendix B of KDB 447498 D04 is applied together with KDB 616217 § 4.3 to determine the minimum test separation distance:

- When the separation distance from the antenna to an adjacent edge is  $\leq 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion.
- When the separation distance from the antenna to an adjacent edge is  $> 5$  mm, the actual antenna-to-edge separation distance is applied to determine SAR test exclusion.

- The available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (mW) described in the following formula.

$P_{th}$  is given by:

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

- The separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz .

$P_{th}$  is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

where

$$x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right)$$

and  $f$  is in GHz,  $d$  is the separation distances (cm).

### SAR Test Exclusion Calculations for $1.5 \text{ GHz} \leq f \leq 6 \text{ GHz}$

| Tx Interface | Frequency (GHz) | Output Power |    | Antenna Gain (dBi) | ERP (dBm) | ERP Threshold (mW) | Separation Distances (cm) |      |       |       |       |       | $P_{th}$ (mW) |      |       |       |       |       | Exemption result |          |           |           |          |          |
|--------------|-----------------|--------------|----|--------------------|-----------|--------------------|---------------------------|------|-------|-------|-------|-------|---------------|------|-------|-------|-------|-------|------------------|----------|-----------|-----------|----------|----------|
|              |                 | dBm          | mW |                    |           |                    | Front                     | Rear | Edge1 | Edge2 | Edge3 | Edge4 | Front         | Rear | Edge1 | Edge2 | Edge3 | Edge4 | Front            | Rear     | Edge1     | Edge2     | Edge3    | Edge4    |
| SRC2.4G      | 2.476           | 55           | 2  | 4.21               | 5.56      | 3.60               | 1                         | 1    | 0.5   | 0.5   | 10.8  | 30.7  | 10            | 10   | 3     | 3     | 940   | 300   | -EXEMPT-         | -EXEMPT- | -MEASURE- | -MEASURE- | -EXEMPT- | -EXEMPT- |
| BLE          | 2.48            | 55           | 2  | 4.23               | 5.58      | 3.61               | 1                         | 1    | 0.5   | 0.5   | 10.8  | 30.7  | 10            | 10   | 3     | 3     | 940   | 300   | -EXEMPT-         | -EXEMPT- | -MEASURE- | -MEASURE- | -EXEMPT- | -EXEMPT- |





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## 6.2 Required Test Configurations

The table below identifies the standalone test configurations required for this device according to the findings in Section 6.1:

| Test Configurations | Front | Rear | Edge1 | Edge2 | Edge3 | Edge4 |
|---------------------|-------|------|-------|-------|-------|-------|
| SRD2.4G             | No    | No   | Yes   | Yes   | No    | No    |
| BLE                 | No    | No   | Yes   | Yes   | No    | No    |

### Note(s):

Yes = Testing is required.

No = Testing is not required.





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## 7 Dielectric Property Measurements & System Check

### 7.1 Dielectric Property Measurements

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

The dielectric constant ( $\epsilon_r$ ) and conductivity ( $\sigma$ ) of typical tissue-equivalent media recipes are expected to be within  $\pm 5\%$  of the required target values; but for SAR measurement systems that have implemented the SAR error compensation algorithms documented in IEEE Std 1528-2013, to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters, the tolerance for  $\epsilon_r$  and  $\sigma$  may be relaxed to  $\pm 10\%$ . This is limited to frequencies  $\leq 3\text{ GHz}$ .

#### Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

| Target Frequency (MHz) | Head         |                | Body         |                |
|------------------------|--------------|----------------|--------------|----------------|
|                        | $\epsilon_r$ | $\sigma$ (S/m) | $\epsilon_r$ | $\sigma$ (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

#### Typical Composition of Ingredients for Liquid Tissue Phantoms

Simulating Liquids for 600 MHz -10 GHz, Manufactured by SPEAG:

| Broad-band head tissue simulating liquids | SPEAG Product   | Frequency range (MHz) | Main Ingredients |
|-------------------------------------------|-----------------|-----------------------|------------------|
|                                           | HBBL600-10000V6 | 600 - 10000           | Water, Oil       |



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**Dielectric Property Measurements Results:**

| Date      | Tissue Type | Frequency (MHz) | Relative Permittivity ( $\epsilon_r$ ) |        |           | Conductivity ( $\sigma$ ) |        |           |
|-----------|-------------|-----------------|----------------------------------------|--------|-----------|---------------------------|--------|-----------|
|           |             |                 | Measured                               | Target | Delta (%) | Measured                  | Target | Delta (%) |
| 2025/7/21 | Head        | 2400            | 40.02                                  | 39.30  | 1.83      | 1.77                      | 1.76   | 0.91      |
|           |             | 2450            | 39.81                                  | 39.20  | 1.56      | 1.83                      | 1.80   | 1.56      |
|           |             | 2480            | 39.70                                  | 39.16  | 1.38      | 1.87                      | 1.83   | 1.80      |



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## 7.2 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:  $2.0 \pm 0.2$  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  $\geq 15.0$  cm for SAR measurements  $\leq 3$  GHz and  $\geq 10.0$  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 15 mm (below 1 GHz) and 10 mm (above 1 GHz) from dipole center to the simulating liquid surface.
- The coarse grid with a grid spacing of 15 mm was aligned with the dipole.  
For 5 GHz band - The coarse grid with a grid spacing of 10 mm was aligned with the dipole.
- Special 7x7x7 (below 3 GHz) and/or 8x8x7 (above 3 GHz) fine cube
- Distance between probe sensors and phantom surface was set to 2 mm.
- The dipole input power (forward power) was 250 mW (below 2GHz) and 100 mW
- The results are normalized to 1 W input power.



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### 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  $\pm 10\%$  of the manufacturer calibrated dipole SAR target. Refer to Appendix 2 for the SAR System Check Plots.

| Date      | Tissue Type | Dipole S/N  | Input Power (mW) | Measured 1g SAR (W/kg) | Targeted 1g SAR (W/kg) | Normalized 1g SAR (W/kg) | Delta 1g $\pm 10$ (%) | Measured 10g SAR (W/kg) | Targeted 10g SAR (W/kg) | Normalized 10g SAR (W/kg) | Delta 10g $\pm 10$ (%) | Plot No. |
|-----------|-------------|-------------|------------------|------------------------|------------------------|--------------------------|-----------------------|-------------------------|-------------------------|---------------------------|------------------------|----------|
| 2025/7/21 | Head        | D2450V2-728 | 250              | 13.70                  | 52.70                  | 54.8                     | 3.98                  | 6.78                    | 24.90                   | 27.12                     | 8.92                   | 1        |



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## 8 Conducted Output Power Measurements

### 8.1 SRD2.4G

| Band (GHz) | Mode | Data Rate | Ch # | Freq. (MHz) | Meas. Avg Pwr (dBm) | Meas. Avg Pwr (mW) | Tune-up Limit (dBm) | SAR Test (Yes/No) |
|------------|------|-----------|------|-------------|---------------------|--------------------|---------------------|-------------------|
| 2.4        | GFSK | 1 Mbps    | 5    | 2405        | 3.11                | 2.05               | 3.5                 | Yes               |
|            |      |           | 47   | 2447        | 2.76                | 1.89               |                     |                   |
|            |      |           | 76   | 2476        | 2.46                | 1.76               |                     |                   |

### 8.2 Bluetooth

| Band (GHz) | Mode     | Data Rate | Ch # | Freq. (MHz) | Meas. Avg Pwr (dBm) | Meas. Avg Pwr (mW) | Tune-up Limit (dBm) | SAR Test (Yes/No) |
|------------|----------|-----------|------|-------------|---------------------|--------------------|---------------------|-------------------|
| 2.4        | LE, GFSK | 1 Mbps    | 0    | 2402        | 3.11                | 2.05               | 3.5                 | Yes               |
|            |          |           | 19   | 2442        | 2.77                | 1.89               |                     |                   |
|            |          |           | 39   | 2480        | 2.38                | 1.73               |                     |                   |

### Duty Factor Measured Results

| Mode | T on (ms) | Period (ms) | Duty Cycle | Crest Factor (1/duty cycle) |
|------|-----------|-------------|------------|-----------------------------|
| GFSK | 0.39      | 0.61        | 63.93%     | 1.94                        |

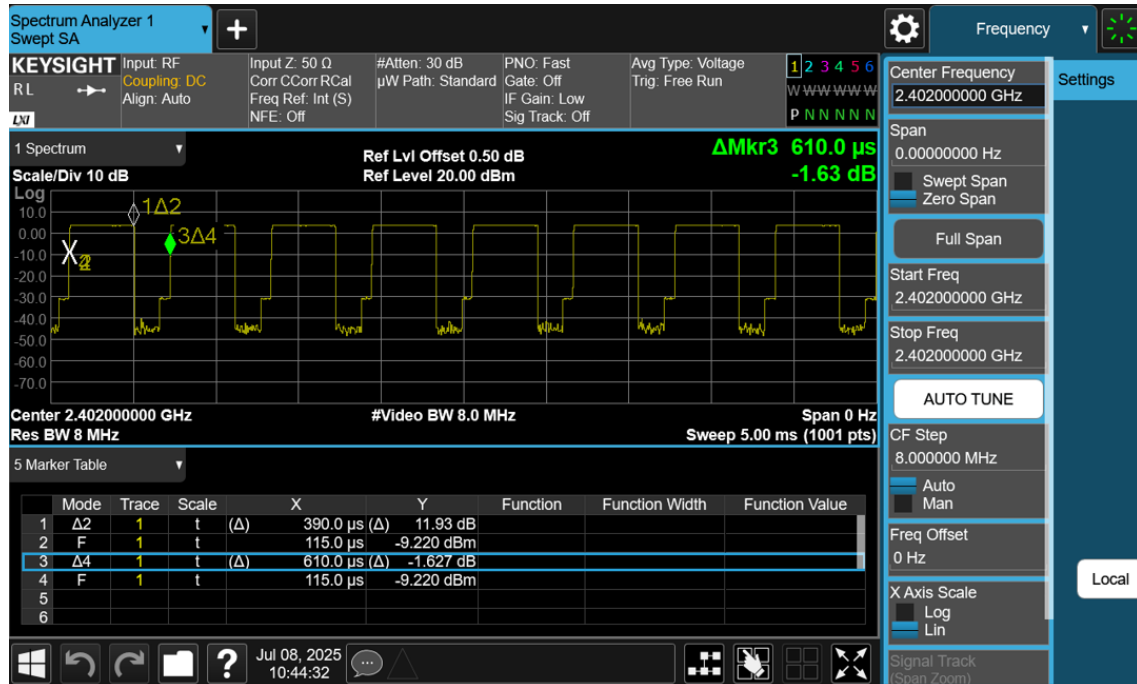


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## Duty Cycle plots

GFSK





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## 9 Measured and Reported (Scaled) SAR Results

### 9.1 SRD2.4G

| RF Exposure Conditions | Mode    | Dist. (mm) | Test Position | Ch #. | Freq. (MHz) | Duty Cycle | Power (dBm)   |       | 1-g SAR (W/kg) |        | Plot No. |
|------------------------|---------|------------|---------------|-------|-------------|------------|---------------|-------|----------------|--------|----------|
|                        |         |            |               |       |             |            | Tune-up Limit | Meas. | Meas.          | Scaled |          |
| Body                   | GFSK_1M | 0          | Edge 1        | 5     | 2405        | 63.41%     | 3.5           | 3.11  | 0.018          | 0.031  |          |
|                        | GFSK_1M | 0          | Edge 2        | 5     | 2405        | 63.41%     | 3.5           | 3.11  | 0.021          | 0.036  | 1        |

### 9.2 Bluetooth

| RF Exposure Conditions | Mode    | Dist. (mm) | Test Position | Ch #. | Freq. (MHz) | Duty Cycle | Power (dBm)   |       | 1-g SAR (W/kg) |        | Plot No. |
|------------------------|---------|------------|---------------|-------|-------------|------------|---------------|-------|----------------|--------|----------|
|                        |         |            |               |       |             |            | Tune-up Limit | Meas. | Meas.          | Scaled |          |
| Body                   | GFSK_1M | 0          | Edge 1        | 0     | 2402        | 63.93%     | 3.5           | 3.11  | 0.012          | 0.021  |          |
|                        | GFSK_1M | 0          | Edge 2        | 0     | 2402        | 63.93%     | 3.5           | 3.11  | 0.013          | 0.022  | 2        |



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## 10 Equipment List & Calibration Status

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.

### Dielectric Property Measurements

| Name of Equipment         | Manufacturer | Type/Model | Serial No. | Cal. Due Date |
|---------------------------|--------------|------------|------------|---------------|
| Dielectric Assessment Kit | SPEAG        | DAKS-3.5   | 1053       | 2026/2/16     |
| Thermometer               | TES          | TES-1306   | 210801061  | 2025/10/16    |

### System Check

| Name of Equipment            | Manufacturer | Type/Model | Serial No. | Cal. Due Date |
|------------------------------|--------------|------------|------------|---------------|
| Signal Generator             | Agilent      | N5181A     | MY50145543 | 2025/12/13    |
| Power Meter                  | Anritsu      | ML2496A    | 2136002    | 2026/7/6      |
| Power Sensor                 | Anritsu      | MA2411B    | 1911386    | 2026/7/6      |
| Power Sensor                 | Anritsu      | MA2411B    | 1911387    | 2025/8/29     |
| Dual Directional Coupler     | Agilent      | 772D       | MY46151258 | 2025/9/29     |
| Amplifier                    | EMCI         | ZVE-8G     | 980190     | N/A           |
| Data Acquisition Electronics | SPEAG        | DAE4       | 558        | 2025/11/17    |
| Dosimetric E-Field Probe     | SPEAG        | EX3DV4     | 7754       | 2025/11/26    |
| System Validation Dipole     | SPEAG        | D2450V2    | 728        | 2025/8/22     |
| Humidity/Temperature meter   | HTC          | HTC-1      | HTC-D07    | 2026/5/25     |
| Thermometer                  | TES          | TES-1306   | 210801061  | 2025/10/16    |

### Software Version

DASY NEO52 D10.3 S14.6.13

SEMCAD-X-PostPro





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## 11 Facilities

All measurement facilities used to collect the measurement data are located at

☒ No.11, Wugong 6th Rd., Wugu Dist., New Taipei City 24891, Taiwan.



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## 12 Appendixes

| Exhibit | Content                                    |
|---------|--------------------------------------------|
| 1       | SAR Setup Photos                           |
| 2       | SAR System Check Plots                     |
| 3       | Highest SAR Test Plots                     |
| 4       | SAR DAE and Probe Calibration Certificates |
| 5       | SAR Dipole Calibration Certificates        |

**END OF REPORT**