



SAR EVALUATION REPORT

FCC 47 CFR § 2.1093
IEEE Std 1528-2013

For
Terminal

FCC ID: MQT-AT170R18W
Model Name: xCL_AT-170-R-18W
Series Model: Utimaco C3

Report Number: 4789969993-US-S0-V0
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REVISION HISTORY

Rev.	Date	Revisions	Revised By
V0	8/4/2021	Initial Issue	Sally Lu

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1. Attestation of Test Results

Applicant Name	XAC Automation Corporation		
FCC ID	MQT-AT170R18W		
Model Name	xCL_AT-170-R-18W		
Series Model	Utimaco C3		
Exposure Category	General Population/Uncontrolled Exposure		
Applicable Standards	FCC 47 CFR § 2.1093 Published RF exposure KDB procedures IEEE Std 1528-2013		
Exposure Category	SAR Limits (W/Kg)		
	Peak spatial-average(1g of tissue)		
General population/Uncontrolled exposure	1.6		
RF Exposure Conditions	Equipment Class - Highest Reported SAR (W/kg)		
	DTS	NII	DSS
Standalone	0.251	0.515	0.023
Date Tested	2021/7/6 ~ 2021/7/28		
Test Results	Pass		
<p>Underwriters Laboratories Taiwan Co., Ltd. tested the above equipment in accordance with the requirements set forth in the above standards. All indications of Pass/Fail in this report are opinions expressed by Underwriters Laboratories Taiwan Co., Ltd. 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.</p> <p>Note: The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by Underwriters Laboratories Taiwan Co., Ltd. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by Underwriters Laboratories Taiwan Co., Ltd. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by TAF or any agency of any government. This report is written to support regulatory compliance of the applicable standards stated above.</p>			
Approved and Authorized By:	Prepared By:		
 Jeff Shih Senior Project Engineer Underwriters Laboratories Taiwan Co., Ltd.	 Sally Lu Project Handler Underwriters Laboratories Taiwan Co., Ltd.		

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:

- 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

3. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at

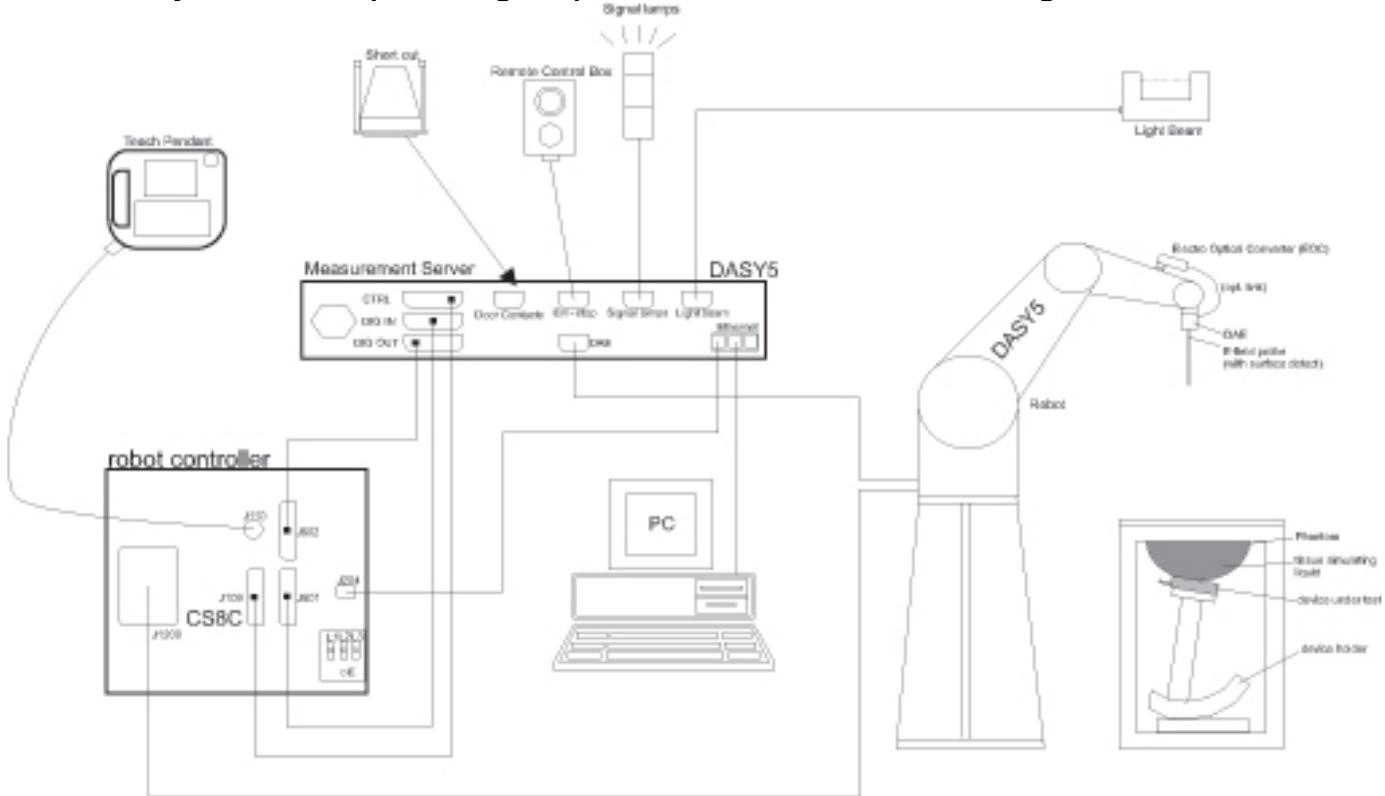
Underwriters Laboratories Taiwan Co., Ltd.,
SAR Room

Underwriters Laboratories Taiwan Co., Ltd. is accredited by TAF, Laboratory Code 3398.

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 or Win10 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 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 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
	≤ 2 GHz: ≤ 15 mm $2 - 3$ GHz: ≤ 12 mm	$3 - 4$ GHz: ≤ 12 mm $4 - 6$ GHz: ≤ 10 mm
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}, \Delta y_{\text{Area}}$	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.	

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: $\Delta x_{Zoom}, \Delta y_{Zoom}$		≤ 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 1 st two points closest to phantom surface $\Delta z_{Zoom}(n>1)$: between subsequent points	≤ 4 mm $\leq 1.5 \cdot \Delta z_{Zoom}(n-1)$
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 draft standard IEEE P1528-2011 for details.

* When zoom scan is required and the reported SAR from the *area scan based 1-g SAR estimation* procedures of KDB 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 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.

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.

Dielectric Property Measurements

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
Network Analyzer	Anritsu	MS46322B	1740002	2022/1/7
Dielectric Assessment Kit	SPEAG	DAK-3.5	1250	2021/9/15
Thermometer	DER EE	DE-3003	P0006880	2021/12/21

System Check

Name of Equipment	Manufacturer	Type/Model	Serial No.	Cal. Due Date
EXG-B RF Vector Signal Generator	Keysight Technologies	N5172B	MY56200315	2022/5/26
Power Meter	Keysight Technologies	N1914A	MY56360007	2021/12/20
Power Sensor	Keysight Technologies	N8481H	MY56350009	2021/12/20
Power Meter	Anritsu	ML2495A	1645002	2021/12/20
Power Sensor	Anritsu	MA2411B	1531202	2021/12/20
Dosimetric E-Field Probe	SPEAG	EX3DV4	3901	2021/9/22
Data Acquisition Electronice	SPEAG	DAE4	1360	2021/9/1
System Validation Dipole	SPEAG	D2450V2	988	2021/11/9
System Validation Dipole	SPEAG	D5GHzV2	1244	2021/11/9
Humidity/Temp meter	TECPEL	DTM-20	17020735	2022/4/11
Thermometer	DER EE	DE-3003	P0006880	2021/12/21

UL Software

Software Version
DASY NEO52 D10.4 S14.6.14
SEMCAD-X-PostPro

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 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

Product	Terminal
Brand Name	XAC, Utimaco
Model Name	xCL_AT-170-R-18W
Series Model	Utimaco C3
Operating Frequency	2.4GHz: 2412MHz ~ 2462MHz 5GHz: 5180 ~ 5240 MHz, 5260 ~ 5320 MHz, 5500 ~ 5700 MHz, 5745 ~ 5825 MHz Bluetooth: 2402MHz ~ 2480MHz
Modulation	2.4GHz: CCK, DQPSK, DBPSK for DSSS 64QAM, 16QAM, QPSK, BPSK for OFDM 5GHz: 64QAM, 16QAM, QPSK, BPSK Bluetooth: GFSK, π/4-DQPSK and 8DPSK
Transfer Rate	802.11a: up to 54 Mbps 802.11b: up to 11 Mbps 802.11g: up to 54 Mbps 802.11n: up to MCS7 Bluetooth: Up to 3 Mbps
S/N	1740D2107
Power source	Li-ion Rechargeable Battery 3.8V 19.76Wh
Software Version	Android Version: 8.1.0 Kernel Version: 3.18.71 (gcc version 4.8(GCC))
Received Date	2021/7/1

Note:

1. The models difference table as below:

Brand	Model	Difference
XAC	xCL_AT-170-R-18W	-
Utimaco	Utimaco C3	For market segmentation

6.2. Wireless Technologies

Wireless technologies	Frequency bands	Operating mode	Duty Cycle used for SAR testing	
Wi-Fi	2.4 GHz	802.11b	100%	
		802.11g		
	5 GHz	802.11n (HT20)		
		802.11a	100% (802.11a)	
		802.11n (HT20)	100% (802.11n 20MHz BW)	
		802.11n (HT40)	98% (802.11n 40MHz BW)	
Does this device support bands 5.60 ~ 5.65 GHz? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Does this device support Band gap channel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Bluetooth	2.4 GHz	BR / EDR	77.13%	
		BLE	61.58%	

7. RF Exposure Conditions (Test Configurations)

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

7.1. Standalone SAR Test Exclusion Considerations

Since the *Dedicated Host Approach* is applied, the standalone SAR test exclusion procedure in KDB 447498 § 4.3.1 (RSS-102 Issue 5 § 2.5.1) is applied in conjunction with KDB 616217 § 4.3 to determine the minimum test separation distance:

- When the separation distance from the antenna to an adjacent edge is ≤ 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.

SAR Test Exclusion Calculations for WLAN

Antennas < 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value							
		dBm	mW	Front	Back	Concave	Edge 1	Edge 2	Edge 3	Edge 4	Front	Back	Concave	Edge 1	Edge 2	Edge 3	Edge 4
Wi-Fi Chain 0 Antenna																	
Wi-Fi 2.4 GHz	2462	16.50	45	20	5	5	10	20	180	80	3.5 -MEASURE-	14.1 -MEASURE-	14.1 -MEASURE-	7.1 -MEASURE-	3.5 -MEASURE-	> 50 mm	> 50 mm
Wi-Fi 5.2 GHz	5240	16.00	40	20	5	5	10	20	180	80	4.6 -MEASURE-	18.3 -MEASURE-	18.3 -MEASURE-	9.2 -MEASURE-	4.6 -MEASURE-	> 50 mm	> 50 mm
Wi-Fi 5.3 GHz	5320	16.50	45	20	5	5	10	20	180	80	5.2 -MEASURE-	20.8 -MEASURE-	20.8 -MEASURE-	10.4 -MEASURE-	5.2 -MEASURE-	> 50 mm	> 50 mm
Wi-Fi 5.5 GHz	5700	16.50	45	20	5	5	10	20	180	80	5.4 -MEASURE-	21.5 -MEASURE-	21.5 -MEASURE-	10.8 -MEASURE-	5.4 -MEASURE-	> 50 mm	> 50 mm
Wi-Fi 5.8 GHz	5825	16.50	45	20	5	5	10	20	180	80	5.4 -MEASURE-	21.7 -MEASURE-	21.7 -MEASURE-	10.9 -MEASURE-	5.4 -MEASURE-	> 50 mm	> 50 mm
Bluetooth	2480	7.10	5	20	5	5	10	20	180	80	0.4 -EXEMPT-	1.6 -EXEMPT-	1.6 -EXEMPT-	0.8 -EXEMPT-	0.4 -EXEMPT-	> 50 mm	> 50 mm

Note(s):

1. According to KDB 447498, if the calculated threshold value is >3 then SAR testing is required.
2. The device is placed or fixed on a flat surface and user is not near the rear of the device, therefore, not need to evaluate the rear.

Antennas > 50mm to adjacent edges

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value						
		dBm	mW	Front	Back	Concave	Edge 1	Edge 2	Edge 3	Edge 4	Front	Back	Concave	Edge 1	Edge 2	Edge 3
Wi-Fi Chain 0 Antenna																
Wi-Fi 2.4 GHz	2462	16.50	45	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1395.6 mW -EXEMPT-	395.6 mW -EXEMPT-
Wi-Fi 5.2 GHz	5240	16.00	40	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1365.5 mW -EXEMPT-	365.5 mW -EXEMPT-
Wi-Fi 5.3 GHz	5320	16.50	45	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1365 mW -EXEMPT-	365 mW -EXEMPT-
Wi-Fi 5.5 GHz	5700	16.50	45	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1362.7 mW -EXEMPT-	362.7 mW -EXEMPT-
Wi-Fi 5.8 GHz	5825	16.50	45	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1362.2 mW -EXEMPT-	362.2 mW -EXEMPT-
Bluetooth	2480	7.10	5	20	5	5	10	20	180	80	< 50 mm	< 50 mm	< 50 mm	< 50 mm	1395.3 mW -EXEMPT-	395.3 mW -EXEMPT-

Note(s):

1. According to KDB 447498, if the calculated Power threshold is less than the output power then SAR testing is required.
2. The device is placed or fixed on a flat surface and user is not near the rear of the device, therefore, not need to evaluate the rear.

8. Dielectric Property Measurements & System Check

8.1. 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 (ϵ_r) and conductivity (σ) 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 ϵ_r and σ may be relaxed to $\pm 10\%$. This is limited to frequencies ≤ 3 GHz.

Tissue Dielectric Parameters

FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz

Target Frequency (MHz)	Head	
	ϵ_r	σ (S/m)
150	52.3	0.76
300	45.3	0.87
450	43.5	0.87
835	41.5	0.90
900	41.5	0.97
915	41.5	0.98
1450	40.5	1.20
1610	40.3	1.29
1800 – 2000	40.0	1.40
2450	39.2	1.80
3000	38.5	2.40
5000	36.2	4.45
5100	36.1	4.55
5200	36.0	4.66
5300	35.9	4.76
5400	35.8	4.86
5500	35.6	4.96
5600	35.5	5.07
5700	35.4	5.17
5800	35.3	5.27

IEEE Std 1528-2013

Refer to Table 3 within the IEEE Std 1528-2013

Dielectric Property Measurements Results:

Date	Tissue Type	Frequency (MHz)	Relative Permittivity (εr)			Conductivity (σ)		
			Measured	Target	Delta (%)	Measured	Target	Delta (%)
2021/7/6	Head	2400	39.15	39.29	-0.36	1.80	1.76	2.61
		2402	39.12	39.29	-0.42	1.80	1.76	2.61
		2412	39.07	39.27	-0.50	1.82	1.77	2.83
		2437	39.03	39.22	-0.49	1.85	1.79	3.35
		2441	39.02	39.22	-0.50	1.85	1.79	3.32
		2450	38.99	39.20	-0.54	1.86	1.80	3.31
		2462	38.97	39.18	-0.55	1.87	1.81	3.19
		2480	38.92	39.16	-0.61	1.89	1.83	2.93
		2500	38.83	39.14	-0.77	1.91	1.85	2.91
2021/7/7	Head	5180	36.62	36.01	1.69	4.70	4.63	1.38
		5250	36.43	35.93	1.40	4.78	4.71	1.54
		5270	36.41	35.91	1.41	4.79	4.73	1.39
		5310	36.27	35.86	1.14	4.84	4.77	1.42
		5320	36.27	35.85	1.17	4.85	4.78	1.57
2021/7/8	Head	5510	35.05	35.63	-1.63	5.03	4.97	1.17
		5550	34.98	35.59	-1.71	5.07	5.01	1.04
		5600	34.86	35.53	-1.87	5.12	5.07	1.14
		5630	34.85	35.49	-1.82	5.16	5.10	1.21
		5670	34.73	35.45	-2.03	5.19	5.14	1.10
		5710	34.71	35.40	-1.96	5.25	5.18	1.35
2021/7/8	Head	5755	34.59	35.35	-2.16	5.29	5.22	1.26
		5795	34.53	35.31	-2.19	5.33	5.26	1.31
		5800	34.51	35.30	-2.22	5.34	5.27	1.33
2021/7/27	Head	2400	39.08	39.29	-0.53	1.80	1.76	2.39
		2402	39.05	39.29	-0.60	1.80	1.76	2.35
		2412	38.96	39.27	-0.79	1.81	1.77	2.40
		2437	38.83	39.22	-1.00	1.84	1.79	2.92
		2441	38.82	39.22	-1.02	1.85	1.79	2.97
		2450	38.78	39.20	-1.07	1.86	1.80	3.16
		2462	38.79	39.18	-1.01	1.87	1.81	3.34
		2480	38.81	39.16	-0.91	1.89	1.83	3.19
		2500	38.73	39.14	-1.04	1.91	1.85	2.86
2021/7/27	Head	5180	35.57	36.01	-1.22	4.73	4.63	1.97
		5250	35.41	35.93	-1.44	4.81	4.71	2.17
		5270	35.41	35.91	-1.38	4.82	4.73	2.02
		5310	35.27	35.86	-1.64	4.86	4.77	1.91
		5320	35.27	35.85	-1.61	4.88	4.78	2.05
2021/7/27	Head	5510	34.90	35.63	-2.06	5.07	4.97	1.87
		5550	34.82	35.59	-2.14	5.10	5.01	1.76
		5600	34.72	35.53	-2.29	5.16	5.07	1.78
		5630	34.71	35.49	-2.21	5.19	5.10	1.91
		5670	34.63	35.45	-2.31	5.23	5.14	1.85
		5710	34.57	35.40	-2.36	5.27	5.18	1.82
2021/7/27	Head	5755	34.48	35.35	-2.46	5.33	5.22	1.96
		5795	34.42	35.31	-2.52	5.37	5.26	2.03
		5800	34.40	35.30	-2.54	5.38	5.27	2.00

8.2. 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 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.

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 ± 10 (%)
2021/7/6	Head	D2450V2-988	250	13.3	52.20	53.2	1.92
2021/7/7	Head	D5GHzV2-1244-5250	100	7.82	77.00	78.2	1.56
2021/7/8	Head	D5GHzV2-1244-5600	100	8.09	80.60	80.9	0.37
2021/7/8	Head	D5GHzV2-1244-5800	100	7.98	77.70	79.8	2.70
2021/7/27	Head	D2450V2-988	250	13.00	52.20	52	-0.38
2021/7/27	Head	D5GHzV2-1244-5250	100	7.95	77.00	79.5	3.25
2021/7/27	Head	D5GHzV2-1244-5600	100	7.51	80.60	75.1	-6.82
2021/7/27	Head	D5GHzV2-1244-5800	100	8.30	77.70	83	6.82

9. Conducted Output Power Measurements

9.1. Wi-Fi 2.4GHz (DTS Band)

Measured Results

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)	Tune-up Limit (dBm)	SAR Test (Yes/No)
2.4GHz (DTS)	802.11b	1 Mbps	1	2412	15.63	16	Yes
			6	2437	15.63	16	
			11	2462	15.70	16	
	802.11g	6 Mbps	1	2412	14.27	15	No
			6	2437	15.11	15.5	
			11	2462	9.78	10	
	802.11n (HT20)	MCS0	1	2412	13.80	14	No
			6	2437	16.27	16.5	
			11	2462	10.51	11	

Note(s):

1. SAR is not required for 802.11g/n modes when the adjusted SAR for 802.11b is < 1.2 W/kg.
2. For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) when the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band. Additional output power measurements were not deemed necessary.
3. Additionally, SAR is not required for Channels 12 and 13 because the tune-up limit and the measured output power for these two channels are no greater than those for the default test channels. Refer to §6.3.

9.2. Wi-Fi 5GHz (U-NII Bands)

Measured Results

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)	Tune-up Limit (dBm)	SAR Test (Yes/No)
5.2GHz (U-NII 1)	802.11a	6Mbps	36	5180	15.63	16.0	No
			40	5200	15.87	16.0	
			44	5220	15.52	16.0	
			48	5240	15.59	16.0	
	802.11n-HT20	MCS0	36	5180	15.57	16.0	
			40	5200	15.92	16.0	
			44	5220	15.70	16.0	
			48	5240	15.86	16.0	
	802.11n-HT40	MCS0	38	5190	13.73	15.0	
			46	5230	14.59	15.0	
5.3GHz (U-NII 2A)	802.11a	6Mbps	52	5260	15.47	16.0	No
			56	5280	15.43	16.0	
			60	5300	15.60	16.0	
			64	5320	15.56	16.0	
	802.11n (HT20)	MCS0	52	5260	15.84	16.0	
			56	5280	15.70	16.0	
			60	5300	15.71	16.0	
			64	5320	15.72	16.0	
	802.11n (HT40)	MCS0	54	5270	16.29	16.5	Yes
			62	5310	14.71	15.0	
5.5GHz (U-NII 2C)	802.11a	6Mbps	100	5500	15.72	16.0	No
			116	5580	15.90	16.0	
			124	5620	15.61	16.0	
			132	5660	15.77	16.0	
			140	5700	15.70	16.0	
	802.11n (HT20)	MCS0	100	5500	15.90	16.0	
			116	5580	15.63	16.0	
			124	5620	15.36	16.0	
			132	5660	15.56	16.0	
			140	5700	15.60	16.0	
	802.11n (HT40)	MCS0	102	5510	15.16	16.5	Yes
			110	5550	16.41	16.5	
			126	5630	16.00	16.5	
			134	5670	16.33	16.5	

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)	Tune-up Limit (dBm)	SAR Test (Yes/No)
5.8GHz (U-NII 3)	802.11a	6 Mbps	149	5745	15.46	16.0	No
			157	5785	15.78	16.0	
			165	5825	15.65	16.0	
	802.11n (HT20)	MCS0	149	5745	15.53	16.0	Yes
			157	5785	15.51	16.0	
			165	5825	15.52	16.0	
	802.11n (HT40)	MCS0	151	5755	16.25	16.5	Yes
			159	5795	16.24	16.5	

Note(s):

1. For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) when the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration, for each frequency band. Additional output power measurements were not deemed necessary.
2. 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.
3. When the specified maximum output power is the same for both UNII band I and UNII band 2A, begin SAR measurement in UNII band 2A; and if the highest reported SAR for UNII band 2A is
 - o $\leq 1.2 \text{ W/kg}$, SAR is not required for UNII band I
 - o $> 1.2 \text{ W/kg}$, both bands should be tested independently for SAR.

9.3. Bluetooth

Average Power Measured Results

Band	Mode	Data Rate	Ch #	Freq. (MHz)	Meas. Avg Pwr (dBm)	Tune-up Limit (dBm)	SAR Test (Yes/No)
Bluetooth	BR	1 Mbps	0	2402	6.94	7.1	No
			39	2441	6.94	7.1	
			78	2480	6.96	7.1	
	EDR	2 Mbps	0	2402	6.05	7.1	No
			39	2441	6.08	7.1	
			78	2480	6.00	7.1	
	EDR	3 Mbps	0	2402	6.06	7.1	No
			39	2441	6.12	7.1	
			78	2480	6.02	7.1	
Bluetooth	BLE	1 Mbps	0	2402	3.6	4.3	No
			19	2440	3.3	4.3	
			39	2480	3.5	4.3	

10. Measured and Reported (Scaled) SAR Results

SAR Test Reduction criteria are as follows:

KDB 447498 D01 General RF Exposure Guidance:

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:

- $\leq 0.8 \text{ W/kg}$ or 2.0 W/kg , for 1-g or 10-g respectively, when the transmission band is $\leq 100 \text{ MHz}$
- $\leq 0.6 \text{ W/kg}$ or 1.5 W/kg , for 1-g or 10-g respectively, when the transmission band is between 100 MHz and 200 MHz
- $\leq 0.4 \text{ W/kg}$ or 1.0 W/kg , for 1-g or 10-g respectively, when the transmission band is $\geq 200 \text{ MHz}$

KDB 248227 D01 SAR meas for 802.11:

SAR test reduction for 802.11 Wi-Fi transmission mode configurations are considered separately for DSSS and OFDM. An initial test position is determined to reduce the number of tests required for certain exposure configurations with multiple test positions. An initial test configuration is determined for each frequency band and aggregated band according to maximum output power, channel bandwidth, wireless mode configurations and other operating parameters to streamline the measurement requirements. For 2.4 GHz DSSS, either the initial test position or DSSS procedure is applied to reduce the number of SAR tests; these are mutually exclusive. For OFDM, an initial test position is only applicable to next to the ear, UMPC mini-tablet and hotspot mode configurations, which is tested using the initial test configuration to facilitate test reduction. For other exposure conditions with a fixed test position, SAR test reduction is determined using only the initial test configuration.

The multiple test positions require SAR measurements in head, hotspot mode or UMPC mini-tablet configurations may be reduced according to the highest reported SAR determined using the initial test position(s) by applying the DSSS or OFDM SAR measurement procedures in the required wireless mode test configuration(s). The initial test position(s) is measured using the highest measured maximum output power channel in the required wireless mode test configuration(s). When the reported SAR for the initial test position is:

- $\leq 0.4 \text{ W/kg}$, further SAR measurement is not required for the other test positions in that exposure configuration and wireless mode combination within the frequency band or aggregated band. DSSS and OFDM configurations are considered separately according to the required SAR procedures.
- $> 0.4 \text{ W/kg}$, SAR is repeated using the same wireless mode test configuration tested in the initial test position to measure the subsequent next closest/smallest test separation distance and maximum coupling test position, on the highest maximum output power channel, until the reported SAR is $\leq 0.8 \text{ W/kg}$ or all required test positions are tested.
 - For subsequent test positions with equivalent test separation distance or when exposure is dominated by coupling conditions, the position for maximum coupling condition should be tested.
 - When it is unclear, all equivalent conditions must be tested.
- For all positions/configurations tested using the initial test position and subsequent test positions, when the reported SAR is $> 0.8 \text{ W/kg}$, measure the SAR for these positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is $\leq 1.2 \text{ W/kg}$ or all required test channels are considered.
 - The additional power measurements required for this step should be limited to those necessary for identifying subsequent highest output power channels to apply the test reduction.
- When the specified maximum output power is the same for both UNII 1 and UNII 2A, begin SAR measurements in UNII 2A with the channel with the highest measured output power. If the reported SAR for UNII 2A is $\leq 1.2 \text{ W/kg}$, SAR is not required for UNII 1; otherwise treat the remaining bands separately and test them independently for SAR.
- When the specified maximum output power is different between UNII 1 and UNII 2A, begin SAR with the band that has the higher specified maximum output. If the highest reported SAR for the band with the highest specified power is $\leq 1.2 \text{ W/kg}$, testing for the band with the lower specified output power is not required; otherwise test the remaining bands independently for SAR.

To determine the initial test position, Area Scans were performed to determine the position with the *Maximum Value of SAR (measured)*. The position that produced the highest *Maximum Value of SAR* is considered the worst case position; thus used as the initial test position.

10.1. Test Condition

Test Item	Test Site No.	Environmental Condition	Test Date	Tested by
SAR	SAR1	21.8°C ~ 22.2°C	2021/7/6 ~ 2021/7/28	Edison Hu

10.2. Wi-Fi (DTS Band)

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	802.11b	0	Front	11	2462	100.0%	16.0	15.70	0.022	0.023	
Body	802.11b	0	Back	11	2462	100.0%	16.0	15.70	0.134	0.144	
Body	802.11b	0	Concave	11	2462	100.0%	16.0	15.70	0.106	0.114	
Body	802.11b	0	Edge 1	11	2462	100.0%	16.0	15.70	0.112	0.120	
Body	802.11b	0	Edge 2	11	2462	100.0%	16.0	15.70	0.234	0.251	1
Body	802.11b	0	Edge 2	1	2412	100.0%	16.0	15.63	0.223	0.243	
Body	802.11b	0	Edge 2	6	2437	100.0%	16.0	15.63	0.229	0.249	

10.3. Wi-Fi (U-NII Band)

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	802.11n (HT40)	0	Front	54	5270	98.00%	16.5	16.29	0.009	0.009	
Body	802.11n (HT40)	0	Back	54	5270	98.00%	16.5	16.29	0.062	0.066	
Body	802.11n (HT40)	0	Concave	54	5270	98.00%	16.5	16.29	0.145	0.155	
Body	802.11n (HT40)	0	Edge 1	54	5270	98.00%	16.5	16.29	0.049	0.052	
Body	802.11n (HT40)	0	Edge 2	54	5270	98.00%	16.5	16.29	0.183	0.196	3
Body	802.11n (HT40)	0	Edge 2	62	5310	98.00%	15.0	14.71	0.151	0.165	

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	802.11n (HT40)	0	Front	110	5550	98.00%	16.5	16.41	0.032	0.033	
Body	802.11n (HT40)	0	Back	110	5550	98.00%	16.5	16.41	0.166	0.173	
Body	802.11n (HT40)	0	Concave	110	5550	98.00%	16.5	16.41	0.285	0.297	
Body	802.11n (HT40)	0	Edge 1	110	5550	98.00%	16.5	16.41	0.078	0.081	
Body	802.11n (HT40)	0	Edge 2	110	5550	98.00%	16.5	16.41	0.494	0.515	4
Body	802.11n (HT40)	0	Edge 2	102	5510	98.00%	16.5	15.16	0.285	0.396	
Body	802.11n (HT40)	0	Edge 2	126	5630	98.00%	16.5	16.00	0.423	0.484	
Body	802.11n (HT40)	0	Edge 2	134	5670	98.00%	16.5	16.33	0.460	0.488	

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	802.11n (HT40)	0	Front	151	5755	98.00%	16.5	16.25	0.011	0.012	
Body	802.11n (HT40)	0	Back	151	5755	98.00%	16.5	16.25	0.161	0.174	
Body	802.11n (HT40)	0	Concave	151	5755	98.00%	16.5	16.25	0.222	0.240	
Body	802.11n (HT40)	0	Edge 1	151	5755	98.00%	16.5	16.25	0.069	0.075	
Body	802.11n (HT40)	0	Edge 2	151	5755	98.00%	16.5	16.25	0.352	0.380	
Body	802.11n (HT40)	0	Edge 2	159	5795	98.00%	16.5	16.24	0.376	0.407	5

10.4. 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	Bluetooth	0	Back	78	2480	77.13%	7.1	6.96	0.016	0.021	
Body	Bluetooth	0	Back	0	2402	77.13%	7.1	6.94	0.016	0.022	
Body	Bluetooth	0	Back	39	2441	77.13%	7.1	6.94	0.017	0.023	2
Body	Bluetooth	0	Concave	78	2480	77.13%	7.1	6.96	0.000	0.000	

Appendices

Refer to separated files for the following appendixes.

4789969993-US-S0-V0_Appendix A: SAR Setup Photos

4789969993-US-S0-V0_Appendix B: SAR System Check Plots

4789969993-US-S0-V0_Appendix C: Highest SAR Test Plots

4789969993-US-S0-V0_Appendix D: Antenna Location

4789969993-US-S0-V0_Appendix E: SAR Probe and Dipole Calibration Certificates

END OF REPORT