

TEST REPORT

| | |
|------------------------|--|
| EUT Description | Wireless Module installed in Laptop |
| Brand Name | Intel® Wi-Fi 6 AX201 |
| Model Name | AX201D2W |
| FCC ID | FCC ID: PD9AX201D2 |
| Date of Test Start/End | 2019-10-30 / 2019-11-08 |
| Features | 802.11 ax, Dual Band, 2x2 Wi-Fi + Bluetooth® 5 (see section 5) |
| Description | Platform: Dell P117G series + WNC antenna, Black Cover |

| | |
|----------------------|--|
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| | | |
|-------------------------------|--|----------------------|
| Reference Standards | FCC 47 CFR Part §2.1093 (see section 1) | |
| RF Exposure Environment | Portable devices - General population/uncontrolled exposure | |
| | SAR Result | SAR Limit |
| Maximum SAR Result & Limit | 0.86 W/kg (1g) | 1.6 W/kg (1g) |
| Min. test separation distance | 0mm to phantom, 3.07mm to antenna edge | |

| | |
|----------------------------|--|
| Test Report identification | 191024-02.TR06 |
| Revision Control | Rev. 00 This test report revision replaces any previous test report revision (see section 8) |

The test results relate only to the samples tested.
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1. Standards, reference documents and applicable test methods

1. FCC 47 CFR Part §2.1093 – Radiofrequency radiation exposure evaluation: portable devices.
2. FCC OET KDB 248227 D01 – SAR guidance for IEEE 802.11 (Wi-Fi) transmitters.
3. FCC OET KDB 447498 D01 –RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices.
4. FCC OET KDB 616217 D04 – SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers.
5. FCC OET KDB 865664 D01 – SAR Measurement Requirements for 100 MHz to 6 GHz.
6. FCC OET KDB 865664 D02 – RF Exposure Compliance Reporting and Documentation Considerations.
7. IEEE Std 1528-2013 – IEEE Recommended Practice Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communication Devices: Measurement Techniques...

2. General conditions, competences and guarantees

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- ✓ Intel Corporation SAS Wireless RF Lab (Intel WRF Lab) is an Accredited Test Firm recognized by the FCC, with Designation Number FR0011.
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3. Environmental Conditions

- ✓ At the site where the measurements were performed the following limits were not exceeded during the tests:

| | |
|--------------------|--------------|
| Temperature | 22.0°C ± 2°C |
| Humidity | 53.8 ± 10% |
| Liquid Temperature | 21.8°C ± 2°C |

4. Test samples

| Sample | Control # | Description | Model | Serial # | Date of receipt | Note |
|--------|---------------|-------------------------------------|----------------------------|--|-----------------|-------------------------|
| #01 | 191024-02.S04 | Wireless Module installed in Laptop | AX201D2W+Dell P117G series | WiFi MAC: 58:A0:23:EA:9B:10 BT MAC: 58:A0:23:EA:9B:14 | 2019-10-30 | Notebook Black cover |

5. EUT Features

| | | | | | | | | | | | | | |
|--|---|----------------|------------------------------|-----------------|------------------------------|--|------------------------------|--|------------------------------|--|------------------------------|-----------|------------------------------|
| Brand Name | Intel® Wi-Fi 6 AX201 | | | | | | | | | | | | |
| Model Name | AX201D2W | | | | | | | | | | | | |
| FCC ID | FCC ID: PD9AX201D2 | | | | | | | | | | | | |
| Software Version | 11.1923.0-09721 | | | | | | | | | | | | |
| Driver Version | 21.20.1.1 | | | | | | | | | | | | |
| Prototype / Production | Production | | | | | | | | | | | | |
| Host Identification | Dell P117G series | | | | | | | | | | | | |
| Exposure Conditions | Body worn | | | | | | | | | | | | |
| Supported Radios | <table border="0"> <tr> <td>802.11b/g/n/ax</td> <td>2.4GHz (2400.0 – 2483.5 MHz)</td> </tr> <tr> <td>802.11a/n/ac/ax</td> <td>5.2GHz (5150.0 – 5250.0 MHz)</td> </tr> <tr> <td></td> <td>5.3GHz (5250.0 – 5350.0 MHz)</td> </tr> <tr> <td></td> <td>5.6GHz (5470.0 – 5725.0 MHz)</td> </tr> <tr> <td></td> <td>5.8GHz (5725.0 – 5825.0 MHz)</td> </tr> <tr> <td>Bluetooth</td> <td>2.4GHz (2400.0 – 2483.5 MHz)</td> </tr> </table> | 802.11b/g/n/ax | 2.4GHz (2400.0 – 2483.5 MHz) | 802.11a/n/ac/ax | 5.2GHz (5150.0 – 5250.0 MHz) | | 5.3GHz (5250.0 – 5350.0 MHz) | | 5.6GHz (5470.0 – 5725.0 MHz) | | 5.8GHz (5725.0 – 5825.0 MHz) | Bluetooth | 2.4GHz (2400.0 – 2483.5 MHz) |
| 802.11b/g/n/ax | 2.4GHz (2400.0 – 2483.5 MHz) | | | | | | | | | | | | |
| 802.11a/n/ac/ax | 5.2GHz (5150.0 – 5250.0 MHz) | | | | | | | | | | | | |
| | 5.3GHz (5250.0 – 5350.0 MHz) | | | | | | | | | | | | |
| | 5.6GHz (5470.0 – 5725.0 MHz) | | | | | | | | | | | | |
| | 5.8GHz (5725.0 – 5825.0 MHz) | | | | | | | | | | | | |
| Bluetooth | 2.4GHz (2400.0 – 2483.5 MHz) | | | | | | | | | | | | |
| Antenna Information | <p>Main Tx1 (Chain B): WNC, Slot antenna WiFi 2.4GHz & 5GHz P/N: 81ELAS15.G30 (DC33002D01L)</p> <p>Aux Tx2 (Chain A): WNC, Slot antenna WiFi 2.4GHz & 5GHz and BT P/N: 81ELAS15.G29 (DC33002D00L)</p> <p>See Annex F for more details on antennas location.</p> | | | | | | | | | | | | |
| Simultaneous Transmission Configurations | <p>WLAN 2.4GHz Main + BT Aux</p> <p>WLAN 2.4GHz Main + WLAN 2.4GHz Aux</p> <p>WLAN 5GHz Main + BT Aux</p> <p>WLAN 5GHz Main + WLAN 5GHz Aux</p> <p>WLAN 5GHz Main + WLAN 5GHz Aux + BT Aux</p> | | | | | | | | | | | | |
| Additional Information | <p>No WWAN transmitter is considered in this report</p> <p>5.60-5.65 GHz band (TDWR) is supported by the device</p> <p>Band gap is supported by the device</p> | | | | | | | | | | | | |

Supported Radios

| Mode | Duty Cycle | Modulation | Band | UL Freq Range (MHz) | Measured Max. Conducted Power (dBm) |
|-------------------|------------|--|--------|---------------------|-------------------------------------|
| 802.11b/g/n/ax | 100% | BPSK QPSK 16QAM 64QAM | 2.4GHz | 2400-2483.5 | 14.00 |
| 802.11a/n/ac/ax | 100% | BPSK QPSK 16QAM 64QAM 256QAM | 5.2GHz | 5150-5250 | NM |
| | | | 5.3GHz | 5250-5350 | 15.50 |
| | | | 5.6GHz | 5475-5725 | 15.50 |
| | | | 5.8GHz | 5725-5850 | 17.00 |
| BDR/EDR v5.0 | 78% | GFSK $\pi/4$ DQPSK 8DPSK | 2.4GHz | 2400-2483.5 | 9.70 |
| Bluetooth LE v5.0 | 64% | GFSK | 2.4GHz | 2400-2483.5 | NM |

NM: Not Measured

| Maximum Output power specification + Tune up tolerance limit | | | SISO mode | |
|--|-------------|----------|------------|-----------|
| Equipment Class | Mode | BW (MHz) | Main (dBm) | Aux (dBm) |
| DTS | 802.11b | 20 | 14.00 | 14.00 |
| | 802.11g | 20 | 14.00 | 14.00 |
| | 802.11n20 | 20 | 14.00 | 14.00 |
| | 802.11ax20 | 20 | 14.00 | 14.00 |
| | 802.11n40 | 40 | 14.00 | 14.00 |
| | 802.11ax40 | 40 | 14.00 | 14.00 |
| U-NII-1 | 802.11a | 20 | 15.00 | 15.00 |
| | 802.11n20 | 20 | 15.00 | 15.00 |
| | 802.11ax20 | 20 | 15.00 | 15.00 |
| | 802.11n40 | 40 | 15.00 | 15.00 |
| | 802.11ax40 | 40 | 15.00 | 15.00 |
| | 802.11ac80 | 80 | 15.00 | 15.00 |
| U-NII-2A | 802.11a | 20 | 15.50 | 15.00 |
| | 802.11n20 | 20 | 15.50 | 15.00 |
| | 802.11ax20 | 20 | 15.50 | 15.00 |
| | 802.11n40 | 40 | 15.50 | 15.00 |
| | 802.11ax40 | 40 | 15.50 | 15.00 |
| | 802.11ac80 | 80 | 15.50 | 15.00 |
| | 802.11ax80 | 80 | 15.50 | 15.00 |
| | 802.11ac160 | 160 | 15.50 | 15.00 |
| U-NII-2C | 802.11a | 20 | 15.50 | 15.00 |
| | 802.11n20 | 20 | 15.50 | 15.00 |
| | 802.11ax20 | 20 | 15.50 | 15.00 |
| | 802.11n40 | 40 | 15.50 | 15.00 |
| | 802.11ax40 | 40 | 15.50 | 15.00 |
| | 802.11ac80 | 80 | 15.50 | 15.00 |
| | 802.11ax80 | 80 | 15.50 | 15.00 |
| | 802.11ac160 | 160 | 15.50 | 15.00 |
| | 802.11ax160 | 160 | 15.50 | 15.00 |
| U-NII-3 | 802.11a | 20 | 17.00 | 16.00 |
| | 802.11n20 | 20 | 17.00 | 16.00 |
| | 802.11ax20 | 20 | 17.00 | 16.00 |
| | 802.11n40 | 40 | 17.00 | 16.00 |
| | 802.11ax40 | 40 | 17.00 | 16.00 |
| | 802.11ac80 | 80 | 17.00 | 16.00 |
| | 802.11ax80 | 80 | 17.00 | 16.00 |

| | | | | |
|----|---------------------|---|--|-------|
| BT | Bluetooth v5.0 BDR | 1 | | 10.50 |
| | Bluetooth v5.0 EDR2 | 1 | | 8.00 |
| | Bluetooth v5.0 EDR3 | 1 | | 7.00 |
| | BLE | 2 | | 7.00 |

The conducted values are obtained by applying the BIOS SAR power values to the AX201D2W Intel module installed in the Dell P117G series identified in this report, as requested by the customer

6. Remarks and comments

- Only the plots for the test positions with the highest measured SAR per band/mode are included in Annex C as required per FCC OET KDB 865664 D02, paragraph 2.3.8.

7. Test Verdicts summary

The statement of conformity to applicable standards in the table below are based on the measured values, without taking into account the measurement uncertainties.

| Standard | Band | Highest Reported SAR (1g) (W/kg) | Verdict |
|-----------------|--------|----------------------------------|---------|
| 802.11b/g/n/ax | 2.4GHz | 0.39 | P |
| 802.11a/n/ac/ax | 5.2GHz | NM | NA |
| | 5.3GHz | 0.86 | P |
| | 5.6GHz | 0.79 | P |
| | 5.8GHz | 0.71 | P |
| Bluetooth | 2.4GHz | 0.13 | P |

P: Pass
 F: Fail
 NM: Not Measured
 NA: Not Applicable

According to the FCC OET KDB 690783 D01, this is the summary of the values for the Grant Listing:

| Exposure Condition | Highest Reported SAR (1g) (W/kg) | | |
|--------------------|----------------------------------|------------------------------|------------------------------|
| | Equipment Class | | |
| | DTS | DSS | U-NII |
| Body Worn | 0.39 | 0.13 | 0.86 |
| Simultaneous Tx | Sum-SAR: 0.75 | Sum-SAR: 1.81 SPLSR: 0.01 | Sum-SAR: 1.81 SPLSR: 0.01 |

Considering the results of the performed test according to FCC 47CFR Part 2.1093 the item under test is IN COMPLIANCE with the requested specifications specified in Section1. Standards, reference documents and applicable test methods

8. Document Revision History

| Revision # | Date | Modified by | Revision Details |
|------------|------------|-------------|------------------|
| Rev. 00 | 2019-12-04 | C. In | First Issue |

Annex A. Test & System Description

A.1 SAR Definition

Specific Absorption rate is defined as the time derivative of the incremental energy (dW) absorbed by (dissipated in) and incremental mass (dm) contained in a volume element (dV) of a given density (ρ).

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

SAR is expressed in units of watts per kilogram (W/kg). SAR can be related to the electric field at a point by

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

Where:

σ = Conductivity of the tissue (S/m)

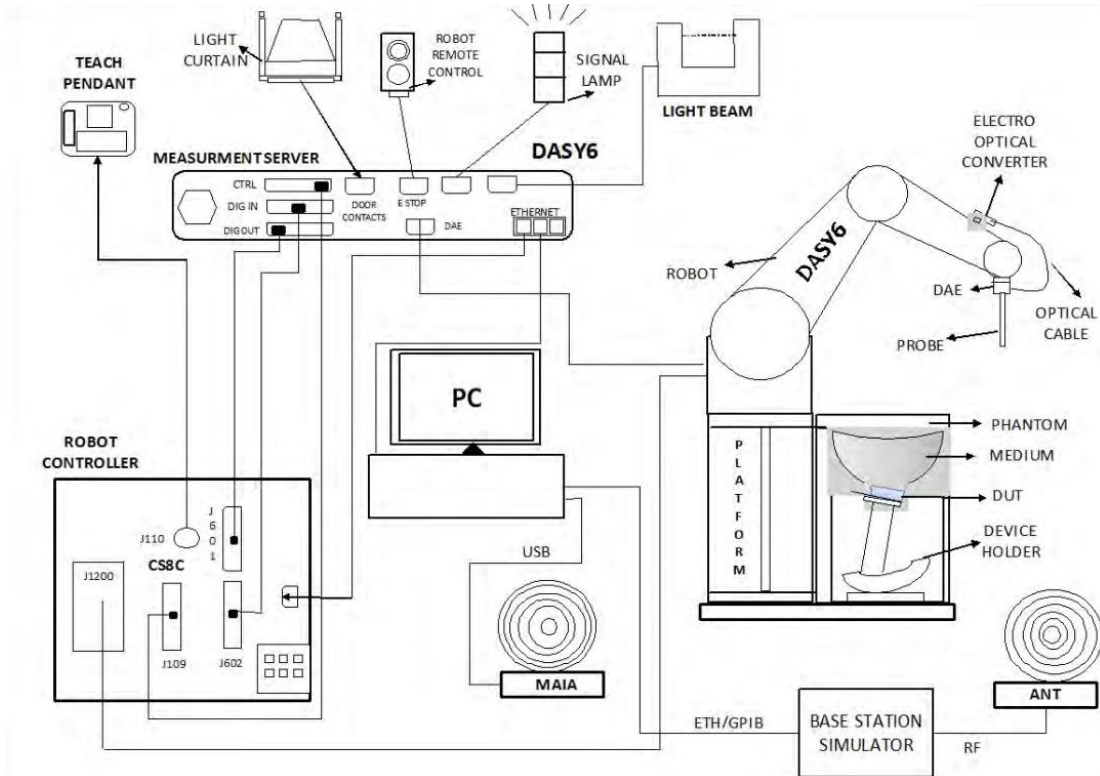
ρ = Mass density of the tissue (kg/m³)

E = RMS electric field strength (V/m)

A.2 SPEAG SAR Measurement System

A.2.1 SAR Measurement Setup

The DASY6 system for performing compliance tests consists of the following items:



- ✓ A standard high precision 6-axis robot (Stäubli TX/RX family) with controller, teach pendant and software. It includes an arm extension for accommodating the data acquisition electronics (DAE)
- ✓ An isotropic field probe optimized and calibrated for the targeted measurements.
- ✓ 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. 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 movements interrupts.
- ✓ The Light Beam used is for probe alignment. This improves the (absolute) accuracy of the probe positioning.
- ✓ A computer running Win7 professional operating system and the DASY6 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.
- ✓ MAIA is a hardware interface (Antenna) used to evaluate the modulation and audio interference characteristics of RF signals.
- ✓ ANT is an ultra-wideband antenna for use with the base station simulators over 698 MHz to 6GHz.
- ✓ The base station simulator is an equipment used for SAR cellular tests in order to emulate the cellular signals characteristics and behavior between a regular base station and the equipment under test.
- ✓ Tissue simulating liquid.
- ✓ System Validation dipoles.
- ✓ Network emulator or RF test tool.

A.2.2 E-Field Measurement Probe

The probe is constructed using three orthogonal dipole sensors arranged on an interlocking, triangular prism core. The probe has built-in shielding against static charges and is contained within a PEEK cylindrical enclosure material at the tip.



The probe's characteristics are:

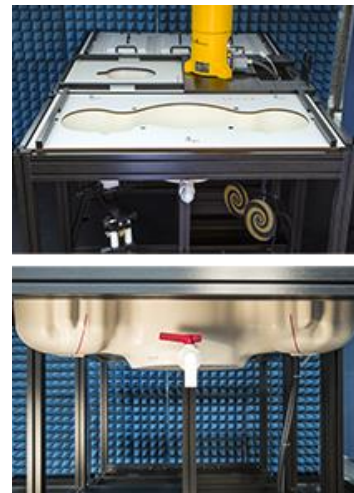
| | |
|--|--------------|
| Frequency Range | 30MHz – 6GHz |
| Length | 337 mm |
| Probe tip external diameter | 2.5 mm |
| Typical distance between dipoles and the probe tip | 1 mm |
| Axial Isotropy (in human-equivalent liquids) | ± 0.3 dB |
| Hemispherical Isotropy (in human-equivalent liquids) | ± 0.5 dB |
| Linearity | ± 0.2 dB |
| Maximum operating SAR | 100 W/kg |
| Lower SAR detection threshold | 0.001 W/kg |

A.2.3 SAM Phantom

The shell corresponds to the specifications of the Specific Anthropomorphic Mannequin (SAM) phantom defined in IEEE 1528 and IEC 62209-1. 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 teaching three points with the robot.

The phantom's characteristics are:

| | |
|------------------------|--|
| Material | Vinylester, glass fiber reinforced (VE-GF) |
| Shell thickness | 2 mm \pm 0.2 mm |
| Shell thickness at ERP | 6 \pm 0.2 mm |
| Filling volume | 25 Liters |
| Dimensions | Length: 1000mm / Width: 500mm |

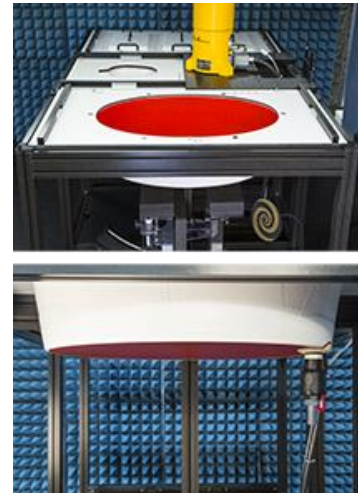


A.2.4 Flat Phantom

Phantom for compliance testing of handheld and body-mounted wireless devices in the frequency range of 30 MHz to 6 GHz. ELI is fully compatible with the IEC 62209-2 standard and all known tissue simulating liquids. ELI 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 compatible with all SPEAG dosimetric probes and dipoles.

The phantom's characteristics are:

| | |
|-----------------|--|
| Material | Vinylester, glass fiber reinforced (VE-GF) |
| Shell thickness | 2 mm \pm 0.2 mm |
| Filling volume | 30 Liters approx. |
| Dimensions | Major axis: 600mm / Minor axis: 400mm |



A.2.5 Device Positioner

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



The DASy device holder is designed to cope with the different positions given in the standard. It has two scales for device rotation (with respect to the body axis) and device inclination (with respect to the line between the ear reference points). The rotation center for both scales is the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.

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

A simple but effective and easy-to-use extension for the Mounting Device; facilitates testing of larger devices according to IEC 62209-2 (e.g., laptops, cameras, etc.); lightweight and fits easily on the upper part of the Mounting Device in place of the phone positioner. The extension is fully compatible with the Twin SAM, ELI and other Flat Phantoms.



A.3 Data Evaluation

- **Power Reference measurement**

The robot measures the E field in a specified reference position that can be either the selected section's grid reference point or a user point in this section at 4mm of the inner surface of the phantom, 2mm for frequencies above 3GHz.

- **Area Scan**

Measurement procedures for evaluating SAR from wireless handsets typically start with a coarse measurement grid to determine the approximate location of the local peak SAR values. This is known as the area-scan procedure. The SAR distribution is scanned along the inside surface of one side of the phantom head, at least for an area larger than the projection of the handset and antenna. The distance between the measured points and phantom surface should be less than 8 mm, and should remain constant (with variation less than ± 1 mm) during the entire scan in order to determine the locations of the local peak SAR with sufficient accuracy. The angle between the probe axis and the surface normal line is recommended but not required to be less than 30° . If this angle is larger than 30° and the closest point on the probe-tip housing to the phantom surface is closer than a probe diameter, the boundary effect may become larger and polarization dependent. This additional uncertainty needs to be analyzed and accounted for. To achieve this, modified test procedures and additional uncertainty analyses not described in this recommended practice may be required. The measurement and interpolation point spacing should be chosen such as to allow identification of the local peak locations to within one-half of the linear dimension of a side of the zoom-scan volume. Because a local peak having specific amplitude and steep gradients may produce a lower peak spatial-average SAR compared to peaks with slightly lower amplitude and less steep gradients, it is necessary to evaluate these other peaks as well. However, since the spatial gradients of local SAR peaks are a function of the wavelength inside the tissue-equivalent liquid and the incident magnetic field strength, it is not necessary to evaluate local peaks that are less than 2 dB or more below the global maximum peak. Two-dimensional spline algorithms (Brishoual et al. 2001; Press et al., 1996) are typically used to determine the peaks and gradients within the scanned area. If a peak is found at a distance from the scan border of less than one-half the edge dimension of the desired 1 g or 10 g cube, the measurement area should be enlarged if possible.

- **Zoom Scan**

To evaluate the peak spatial-average SAR values for 1 g or 10 g cubes, fine resolution volume scans, called zoom scans, are performed at the peak SAR locations identified during the area scan. The minimum zoom scan volume size should extend at least 1.5 times the edge dimension of a 1 g cube in all directions from the center of the scan volume, for both 1 g and 10 g peak spatial-average SAR evaluations. Along the phantom curved surfaces, the front face of the volume facing the tissue/liquid interface conforms to the curved boundary, to ensure that all SAR peaks are captured. The back face should be equally distorted to maintain the correct averaging mass. The flatness and orientation of the four side faces are unchanged from that of a cube whose orientation is within $\pm 30^\circ$ of the line normal to the phantom at the center of the cube face next to the phantom surface. The peak local SAR locations that were determined in the area scan (interpolated values) should be used for the centers of the zoom scans. If a scan volume cannot be centered due to proximity of a phantom shape feature, the probe should be tilted to allow scan volume enlargement. If probe tilt is not feasible, the zoom-scan origin may be shifted, but not by more than half of the 1 g or 10 g cube edge dimension.

After the zoom-scan measurement, extrapolations from the closest measured points to the surface, for example along lines parallel to the zoom-scan centerline, and interpolations to a finer resolution between all measured and extrapolated points are performed. Extrapolation algorithm considerations are described in 6.5.3, and 3-D spline methods (Brishoual et al., 2001; Kreyszig, 1983; Press et al., 1996) can be used for interpolation. The peak spatial-average SAR is finally determined by a numerical averaging of the local SAR values in the interpolation grid, using for example a trapezoidal algorithm for the integration (averaging).

In some areas of the phantom, such as the jaw and upper head regions, the angle of the probe with respect to the line normal to the surface may be relatively large, e.g., greater than $\pm 30^\circ$, which could increase the boundary effect error to a larger level. In these cases, during the zoom scan a change in the orientation of the probe, the phantom, or both is recommended but not required for the duration of the zoom scan, so that the angle between the probe axis and the line normal to the surface is within 30° for all measurement points.

- **Power Drift measurement**

The robot re-measures the E-Field in the same reference location measured at the Power Reference. The drift measurement gives the field difference in dB from the first to the last reference reading. This allows a user to monitor the power drift of the device under test that must remain within a maximum variation of $\pm 5\%$.

- **Post-processing**

The procedure for spatial peak SAR evaluation has been implemented according to the IEEE1528 and IEC 62209-1/2 standards. It can be conducted for 1g and 10g.

The software allows evaluations that combine measured data and robot positions, such as:

- ✓ Maximum search
- ✓ Extrapolation
- ✓ Boundary correction
- ✓ Peak search for averaged SAR

Interpolation between the measured points is performed when the resolution of the grid is not fine enough to compute the average SAR over a given mass.

Extrapolation routines are used to obtain SAR values between the lowest measurement points and the inner phantom surface. The extrapolation is determined by the surface detection distance and the probe sensor offset. Several measurements at different distances are necessary for the extrapolation.

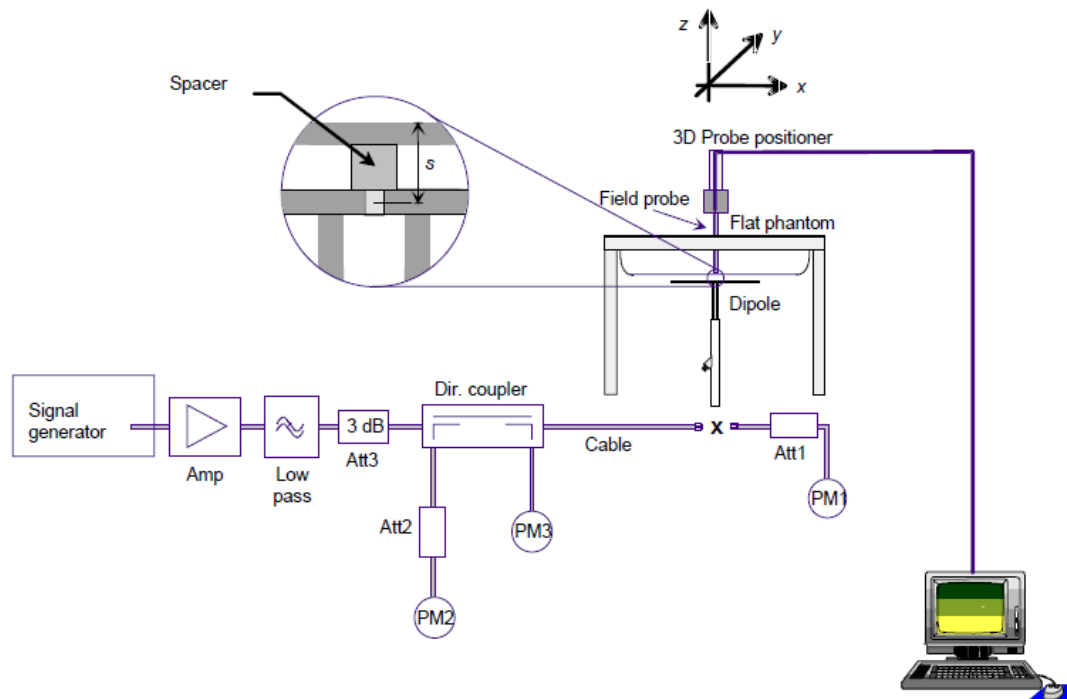
A.4 System and Liquid Check

A.4.1 System Check

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results.

The system performance check uses normal SAR measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

In the simplified setup for system check, the EUT is replaced by a calibrated dipole and the power source is replaced by a controlled continuous wave generated by a signal generator. The calibrated dipole must be placed beneath the flat phantom section of the phantom at the correct distance.



The equipment setup is shown below:

- ✓ Signal Generator
- ✓ Amplifier
- ✓ Directional coupler
- ✓ Power meter
- ✓ Calibrated dipole

First, the power meter PM1 (including attenuator Att1) is connected to the cable to measure the forward power at the location of the connector (x) to the system check source. The signal generator is adjusted for the desired forward power at the connector as read by power meter PM1 after attenuation Att1 and also as coupled through Att2 to PM2. After connecting the cable to the source, the signal generator is readjusted for the same reading at power meter PM2.

SAR results are normalized to a forward power of 1W to compare the values with the calibration reports results as described at IEEE 1528 and IEC 62209 standards.

A.4.2 Liquid Check

The dielectric parameters check is done prior to the use of the tissue simulating liquid. The verification is made by comparing the relative permittivity and conductivity to the values recommended by the applicable standards.

The liquid verification was performed using the following test setup:

- ✓ VNA (Vector Network Analyzer)
- ✓ Open-Short-Load calibration kit
- ✓ RF Cable
- ✓ Open-Ended Coaxial probe
- ✓ DAK software tool
- ✓ SAR Liquid
- ✓ De-ionized water
- ✓ Thermometer

These are the target dielectric properties of the tissue-equivalent liquid material as defined in FCC OET KDB 865664 D01.

| Frequency (MHz) | Body SAR | |
|--------------------|--------------------|----------------|
| | ϵ_r (F/m) | σ (S/m) |
| 150 | 61.9 | 0.80 |
| 300 | 58.2 | 0.92 |
| 450 | 56.7 | 0.94 |
| 835 | 55.2 | 0.97 |
| 900 | 55.0 | 1.05 |
| 1450 | 54.0 | 1.30 |
| 1800-2000 | 53.3 | 1.52 |
| 2450 | 52.7 | 1.95 |
| 3000 | 52.0 | 2.73 |
| 5800 | 48.2 | 6.00 |

(ϵ_r = relative permittivity, σ = conductivity and ρ = 1000 kg/m³)

The measurement system implement a SAR error compensation algorithm as documented in IEEE Std 1528-2013 (equivalent to draft standard IEEE P1528-2011) to automatically compensate the measured SAR results for deviations between the measured and required tissue dielectric parameters (applied to only scale up the measured SAR, and not downward) so, according to FCC OET KDB 865664 D01, the tolerance for ϵ_r and σ may be relaxed to $\pm 10\%$.

A.5 Test Equipment List

A.5.1 SAR System #1

| ID # | Device | Type/Model | Serial Number | Manufacturer | Cal. Date | Cal. Due Date |
|------|------------------------------|----------------------------|-----------------|--------------|------------|---------------|
| 0218 | Laptop Holder | P/N SM LH1 001 CD | - | SPEAG | NA | NA |
| 0221 | SAM Phantom | Twin SAM v5.0 | 1838 | SPEAG | NA | NA |
| 0223 | Measurement SW | DASY6 6.8.0.14623 | 9-618AE2F1 | SPEAG | NA | NA |
| 0229 | Light Beam Unit | SE UKS 030 AA | - | Di-soric | NA | NA |
| 0231 | 6-axis Robot | TX60 L | F12/5MZ3A1/A/01 | STAÜBLI | NA | NA |
| 0233 | Robot Controller | CS8C | F12/5MZ3A1/C/01 | STAÜBLI | NA | NA |
| 0243 | Electro-Optical Converter | EOC60 | 1076 | SPEAG | NA | NA |
| 0637 | Oval Flat Phantom | ELI v8.0 | 2059 | SPEAG | NA | NA |
| 0260 | Dosimetric E-field Probe | EX3DV4 | 7325 | SPEAG | 2018-12-13 | 2019-12-13 |
| 0418 | Data Acquisition Electronics | DAE4 | 1496 | SPEAG | 2018-12-06 | 2019-12-06 |
| 0660 | Measurement Server | DASY6 P/N SE UMS 028 BB | 1548 | SPEAG | NA | NA |

A.5.2 Shared Instrumentation

| ID # | Device | Type/Model | Serial Number | Manufacturer | Cal. Date | Cal. Due Date |
|------|----------------------------------|---------------------|---------------|------------------------------|------------|---------------|
| 0094 | Thermometer | TESTO 922 | 33622932 | Testo | 2017-11-29 | 2019-11-29 |
| 0098 | USB Power Sensor | NRP-Z81 | 102278 | R&S | 2019-04-02 | 2021-04-02 |
| 0099 | USB Power Sensor | NRP-Z81 | 102279 | R&S | 2019-04-02 | 2021-04-02 |
| 0114 | Vector Signal Generator | ESG E4438C | MY45092885 | Agilent | NA | NA |
| 0170 | Power Amplifier | SAM-01 | 151922 | ETS-Lindgren | NA | NA |
| 0224 | Liquid measurement SW | DAK-3.5 V2.6.0.5 | 9-2687B491 | SPEAG | NA | NA |
| 0237 | Dielectric Probe Kit | DAK-3.5 | 1037 | SPEAG | 2019-07-16 | 2021-07-16 |
| 0239 | 2450MHz System Validation Dipole | D2450V2 | 937 | SPEAG | 2018-05-18 | 2020-05-18 |
| 0412 | Coupler | CD0.5-8-20-30 | 1251-002 | Amd-group | NA | NA |
| 0591 | 5GHz System Validation Dipole | D5GHZv2 | 1259 | SPEAG | 2018-02-12 | 2020-02-12 |
| 0619 | USB Power Sensor | NRP-Z81 | 104381 | R&S | 2018-04-16 | 2020-04-16 |
| 0655 | Vector Reflectometer | PLANAR R140 | 0190616 | Copper Mountain Technologies | 2019-08-07 | 2021-08-07 |
| 0799 | Temp & Humidity Logger | RA32E-TH1-RAS | RA32-FBFD5A | AVTECH | 2019-06-27 | 2021-06-27 |

A.5.3 Tissue Simulant Liquid

| TSL | Manufacturer / Model | Freq Range (MHz) | Main Ingredients |
|---------------|---|------------------|--|
| Body WideBand | SPEAG MBBL600-6000V6 Batch 160630-01 | 600-6000 | Ethanediol, Sodium petroleum sulfonate, Hexylene Glycol / 2-Methyl-pentane-2.4-diol, Alkoxylated alcohol |

A.6 Measurement Uncertainty Evaluation

The system uncertainty evaluation is shown in the below table:

SAR System #1

| SPEAG DASY6 Uncertainty Budget | | | | | | | | |
|--|---------------|-------------|------|---------|----------|----------------|-----------------|-----------------------|
| According to IEEE 1528-2013 and IEC 62209-1/2016 (0.3 - 6 GHz range) | | | | | | | | |
| Error Description | Uncert. value | Prob. Dist. | Div. | (ci) 1g | (ci) 10g | Std. Unc. (1g) | Std. Unc. (10g) | (vi) v _{eff} |
| Measurement System | | | | | | | | |
| Probe Calibration | ±7.00 | N | 1 | 1 | 1 | ±7.00 | ±7.00 | ∞ |
| Axial Isotropy | ±4.7 % | R | √3 | 0.7 | 0.7 | ±1.9 % | ±1.9 % | ∞ |
| Hemispherical Isotropy | ±9.6 % | R | √3 | 0.7 | 0.7 | ±3.9 % | ±3.9 % | ∞ |
| Boundary Effects | ±2.0 % | R | √3 | 1 | 1 | ±1.2 % | ±1.2 % | ∞ |
| Linearity | ±4.7 % | R | √3 | 1 | 1 | ±2.7 % | ±2.7 % | ∞ |
| System Detection Limits | ±1.0 % | R | √3 | 1 | 1 | ±0.6 % | ±0.6 % | ∞ |
| Modulation Response | ±2.4 % | R | √3 | 1 | 1 | ±1.4 % | ±1.4 % | ∞ |
| Readout Electronics | ±0.3 % | N | 1 | 1 | 1 | ±0.3 % | ±0.3 % | ∞ |
| Response Time | ±0.8 % | R | √3 | 1 | 1 | ±0.5 % | ±0.5 % | ∞ |
| Integration Time | ±2.6 % | R | √3 | 1 | 1 | ±1.5 % | ±1.5 % | ∞ |
| RF Ambient Noise | ±3.0 % | R | √3 | 1 | 1 | ±1.7 % | ±1.7 % | ∞ |
| RF Ambient Reflections | ±3.0 % | R | √3 | 1 | 1 | ±1.7 % | ±1.7 % | ∞ |
| Probe Positioner | ±0.04 % | R | √3 | 1 | 1 | ±0.0 % | ±0.0 % | ∞ |
| Probe Positioning | ±0.8 % | R | √3 | 1 | 1 | ±0.5 % | ±0.5 % | ∞ |
| Max. SAR Eval. | ±4.0 % | R | √3 | 1 | 1 | ±2.3 % | ±2.3 % | ∞ |
| Test Sample Related | | | | | | | | |
| Device Positioning | ±2.9 % | N | 1 | 1 | 1 | ±2.9 % | ±2.9 % | 145 |
| Device Holder | ±3.6 % | N | 1 | 1 | 1 | ±3.6 % | ±3.6 % | 5 |
| Power Drift | ±5.0 % | R | √3 | 1 | 1 | ±2.9 % | ±2.9 % | ∞ |
| Power Scaling | ±0.0 % | R | √3 | 1 | 1 | ±0.0 % | ±0.0 % | ∞ |
| Phantom and Setup | | | | | | | | |
| Phantom Uncertainty | ±6.6 % | R | √3 | 1 | 1 | ±3.8 % | ±3.8 % | ∞ |
| SAR correction | ±1.9 % | N | √3 | 1 | 0.84 | ±1.9 % | ±1.6 % | ∞ |
| Liquid Conductivity (mea.) DAK | ±2.5 % | N | √3 | 0.78 | 0.71 | ±2.0 % | ±1.8 % | ∞ |
| Liquid Permittivity (mea.) DAK | ±2.5 % | N | √3 | 0.23 | 0.26 | ±0.6 % | ±0.7 % | ∞ |
| Temp. unc. - Conductivity BB | ±3.4 % | R | √3 | 0.78 | 0.71 | ±1.5 % | ±1.4 % | ∞ |
| Temp. unc. - Permittivity BB | ±0.4 % | R | √3 | 0.23 | 0.26 | ±0.1 % | ±0.1 % | ∞ |
| Combined Std. Uncertainty | | | | | | ±11.6 % | ±11.5 % | 569 |
| Expanded STD Uncertainty | | | | | | ±23.2 % | ±23.0 % | |

| SPEAG DASY6 Uncertainty Budget According to IEC 62209-2/2010 (30 MHz - 6 GHz range) | | | | | | | | |
|--|---------------|-------------|------|---------|----------|----------------|-----------------|-----------------------|
| Error Description | Uncert. value | Prob. Dist. | Div. | (ci) 1g | (ci) 10g | Std. Unc. (1g) | Std. Unc. (10g) | (vi) v _{eff} |
| Measurement System | | | | | | | | |
| Probe Calibration | ±7.00 % | N | 1 | 1 | 1 | ±7.00 % | ±7.00 % | ∞ |
| Axial Isotropy | ±4.7 % | R | √3 | 0.7 | 0.7 | ±1.9 % | ±1.9 % | ∞ |
| Hemispherical Isotropy | ±9.6 % | R | √3 | 0.7 | 0.7 | ±3.9 % | ±3.9 % | ∞ |
| Linearity | ±4.7 % | R | √3 | 1 | 1 | ±2.7 % | ±2.7 % | ∞ |
| Modulation Response | ±2.4 % | R | √3 | 1 | 1 | ±1.4 % | ±1.4 % | ∞ |
| System Detection Limits | ±1.0 % | R | √3 | 1 | 1 | ±0.6 % | ±0.6 % | ∞ |
| Boundary Effects | ±2.0 % | R | √3 | 1 | 1 | ±1.2 % | ±1.2 % | ∞ |
| Readout Electronics | ±0.3 % | N | 1 | 1 | 1 | ±0.3 % | ±0.3 % | ∞ |
| Response Time | ±0.8 % | R | √3 | 1 | 1 | ±0.5 % | ±0.5 % | ∞ |
| Integration Time | ±2.6 % | R | √3 | 1 | 1 | ±1.5 % | ±1.5 % | ∞ |
| RF Ambient Noise | ±3.0 % | R | √3 | 1 | 1 | ±1.7 % | ±1.7 % | ∞ |
| RF Ambient Reflections | ±3.0 % | R | √3 | 1 | 1 | ±1.7 % | ±1.7 % | ∞ |
| Probe Positioner | ±0.04 % | R | √3 | 1 | 1 | ±0.0 % | ±0.0 % | ∞ |
| Probe Positioning | ±0.8 % | R | √3 | 1 | 1 | ±0.5 % | ±0.5 % | ∞ |
| Post-processing | ±4.0 % | R | √3 | 1 | 1 | ±2.3 % | ±2.3 % | ∞ |
| Test Sample Related | | | | | | | | |
| Device Holder | ±3.6 % | N | 1 | 1 | 1 | ±3.6 % | ±3.6 % | 5 |
| Test sample Positioning | ±2.9 % | N | 1 | 1 | 1 | ±2.9 % | ±2.9 % | 145 |
| Power Scaling | ±0.0 % | R | √3 | 1 | 1 | ±0.0 % | ±0.0 % | ∞ |
| Power Drift | ±5.0 % | R | √3 | 1 | 1 | ±2.9 % | ±2.9 % | ∞ |
| Phantom and Setup | | | | | | | | |
| Phantom Uncertainty | ±7.6 % | R | √3 | 1 | 1 | ±4.4 % | ±4.4 % | ∞ |
| SAR correction | ±1.9 % | N | √3 | 1 | 0.84 | ±1.9 % | ±1.6 % | ∞ |
| Liquid Conductivity (mea.) DAK | ±2.5 % | N | √3 | 0.78 | 0.71 | ±2.0 % | ±1.8 % | ∞ |
| Liquid Permittivity (mea.) DAK | ±2.5 % | N | √3 | 0.23 | 0.26 | ±0.6 % | ±0.7 % | ∞ |
| Temp. unc. - Conductivity BB | ±3.4 % | R | √3 | 0.78 | 0.71 | ±1.5 % | ±1.4 % | ∞ |
| Temp. unc. - Permittivity BB | ±0.4 % | R | √3 | 0.23 | 0.26 | ±0.1 % | ±0.1 % | ∞ |
| Combined Std. Uncertainty | | | | | | ±11.6 % | ±11.6 % | 605 |
| Expanded STD Uncertainty | | | | | | ±23.3 % | ±23.2 % | |

A.7 RF Exposure Limits

SAR assessments have been made in line with the requirements of FCC 47 CFR Part §2.1093 on the limitation of exposure of the general population / uncontrolled exposure for portable devices

| Exposure Type | General Population / Uncontrolled Environment |
|--|--|
| Peak spatial-average SAR (averaged over any 1 gram of tissue) | 1.6 W/kg |
| Whole body average SAR | 0.08 W/kg |
| Peak spatial-average SAR (extremities) (averaged over any 10 grams of tissue) | 4.0 W/kg |

Annex B. Test Results

B.1 Test Conditions

B.1.1 Test SAR Test positions relative to the phantom

The device under test was an Intel® Wi-Fi 6 AX201 card inside a notebook host platform (Dell P117G series) using a set of Slot antennas. The card was operated utilizing proprietary software (DRTU version 11.1923.0-09721) and each channel was measured using a broadband power meter to determine the maximum average power.

According to FCC OET KDB 616217 D04, laptop position should be tested for SAR compliance with the display screen opened at an angle of 90° to the keyboard compartment and the notebook bottom surface must be touching the phantom.

See B.1.3.1 for a more detailed list of the applied reductions.

See F.2 *Test positions* section for more information on the tested positions.

B.1.2 Test signal, Output power and Test Frequencies

For 802.11 transmission modes the device was put into operation by using an own control software to program the test mode required to select the continuous transmission with 100% duty cycle.

The output power of the device was set to transmit at maximum power for all tests.

B.1.3 Evaluation Exclusion and Test Reductions

B.1.3.1 SAR evaluation exclusion

The SAR Test Exclusion Threshold in FCC OET KDB 447498 D01 v06 can be applied to determine SAR test exclusion for adjacent edge configurations. For 100MHz to 6GHz and test separation distances ≤50mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following formula:

$$[(\text{max. power of channel, including tune – up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot \left[\sqrt{f_{\text{(GHz)}}} \right] \leq 3.0 \text{ for } 1g \text{ SAR, and } \leq 7.5 \text{ for } 10g \text{ extremity SAR} \quad (1)$$

Where:

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- The values 3.0 and 7.5 are referred to as numeric thresholds

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm, and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

For test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined using the following formulas:

$$((\text{Power allowed at numeric threshold for } 50 \text{ mm in (1)}) + (\text{test separation distance} - 50 \text{ mm}) \cdot (f_{\text{MHz}}/150)) \text{mW, for } 100\text{MHz to } 1500\text{MHz} \quad (2)$$

$$((\text{Power allowed at numeric threshold for } 50 \text{ mm in (1)}) + (\text{test separation distance} - 50 \text{ mm}) \cdot 10) \text{mW, for } 1500\text{MHz and } \leq 6\text{GHz} \quad (3)$$

| LAN Antenna | Band Name | Output power | | Laptop | SAR |
|-------------|-----------|--------------|------|--------|-----|
| | | dBm | mW | | |
| WLAN Main | DTS | 14.0 | 25.1 | <50 | T |
| | U-NII-1 | 15.0 | 21.6 | <50 | R |
| | U-NII-2A | 15.5 | 35.5 | <50 | T |
| | U-NII-2C | 15.5 | 35.5 | <50 | T |
| | U-NII-3 | 17.0 | 50.1 | <50 | T |
| WLAN Aux | DTS | 14.0 | 25.1 | <50 | T |
| | U-NII-1 | 15.0 | 21.6 | <50 | R |
| | U-NII-2A | 15.0 | 21.6 | <50 | T |
| | U-NII-2C | 15.0 | 21.6 | <50 | T |
| | U-NII-3 | 16.0 | 39.8 | <50 | T |
| | BT | 10.5 | 11.2 | <50 | T |

T: Tested position
R: Reduced

See Annex F for a more detailed explanation of the separation distance related to the platform.

B.1.3.2 General SAR test reduction

According to FCC OET KDB 447498 D01, 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

WLAN SAR Test reduction

| Transmission Mode | SAR test exclusion/reduction |
|-------------------|---|
| DSSS | <p>According to FCC OET KDB 248227 D01, SAR is measured for 2.4 GHz 802.11b, SAR test reduction is determined according to the following:</p> <ul style="list-style-type: none"> ▪ When the reported SAR of the highest measured maximum output power channel for the exposure configuration is ≤ 0.8 W/kg, no further SAR testing is required for 802.11b DSSS in that exposure configuration. ▪ When the reported SAR is > 0.8 W/kg, SAR is required for that exposure configuration using the next highest measured output power channel. When any reported SAR is > 1.2 W/kg, SAR is required for the third channel. <p>According to FCC OET KDB 248227 D01, SAR is not required for 2.4 GHz OFDM conditions when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.</p> |
| OFDM | <p>According to FCC OET KDB 248227 D01, 802.11a/g/n/ac modes have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, the lowest order 802.11 mode is selected; i.e., 802.11a is chosen over 802.11n then 802.11ac or 802.11g is chosen over 802.11n.</p> <p>According to FCC OET KDB 248227 D01, an <i>initial test configuration</i> is determined for OFDM and DSSS transmission modes according to the channel bandwidth, modulation and data rate combination(s) with the highest maximum output power specified for production units in each standalone and aggregated frequency band. SAR is measured using the highest measured maximum output power channel. SAR test reduction for subsequent highest output test channels is determined according to reported SAR of the initial test configuration.</p> <p>The <i>initial test configuration</i> for 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures.</p> <p>According to FCC OET KDB 248227 D01, when the reported SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is ≤ 1.2 W/kg or all required channels are tested.</p> |

B.2 Conducted Power Measurements

B.2.1 WLAN 2.4GHz

| Band | Mode | Data Rate | Ch # | Freq (MHz) | Main | | Aux | | SAR Test? | |
|--------------|------------|-----------|------|------------|-------------------|-------------------|-------------------|-------------------|-----------------|-----------------|
| | | | | | Avg Pwr (dBm) | Tune-up Pwr (dBm) | Avg Pwr (dBm) | Tune-up Pwr (dBm) | | |
| 2.4GHz (DTS) | 802.11b | 1Mbps | 1 | 2412 | 14.00 | 14.00 | 13.95 | 14.00 | Yes | |
| | | | 6 | 2437 | 13.90 | 14.00 | 13.95 | 14.00 | No ³ | |
| | | | 11 | 2462 | 13.98 | 14.00 | 13.90 | 14.00 | | |
| | 802.11g | 6Mbps | 1 | 2412 | NR ^{1,2} | 14.00 | NR ^{1,2} | 14.00 | 14.00 | No ² |
| | | | 6 | 2437 | | 14.00 | | 14.00 | | |
| | | | 11 | 2462 | | 14.00 | | 14.00 | | |
| | 802.11n20 | HT0 | 1 | 2412 | | 14.00 | | 14.00 | | |
| | | | 6 | 2437 | | 14.00 | | 14.00 | | |
| | | | 11 | 2462 | | 14.00 | | 14.00 | | |
| | 802.11ax20 | HE0 | 1 | 2412 | | 14.00 | | 14.00 | | |
| | | | 6 | 2437 | | 14.00 | | 14.00 | | |
| | | | 11 | 2462 | | 14.00 | | 14.00 | | |
| | 802.11n40 | HT0 | 3 | 2422 | | 14.00 | | 14.00 | | |
| | | | 6 | 2437 | | 14.00 | | 14.00 | | |
| | | | 9 | 2452 | | 14.00 | | 14.00 | | |
| | 802.11ax40 | HE0 | 3 | 2422 | | 14.00 | | 14.00 | | |
| | | | 6 | 2437 | | 14.00 | | 14.00 | | |
| | | | 9 | 2452 | | 14.00 | | 14.00 | | |

Initial test configuration

1. NR: Not Required
2. As per FCC OET KDB 248227 D01, conducted output power and SAR testing are not required for 802.11g/n/ax channels when the highest reported SAR for DSSS is adjusted by the ratio of OFDM to DSSS specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg.
3. When the reported SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is ≤ 1.2 W/kg or all required NR channels are tested.

B.2.2 WLAN 5GHz (U-NII)

B.2.2.1 5.2GHz and 5.3GHz (U-NII-1 and U-NII-2A)

| Band | Mode | Data Rate | Ch # | Freq (MHz) | Main | | Aux | | SAR Test? |
|------------------|------------|-----------|------|------------|-------------------|-------------------|-------------------|-------------------|-----------------|
| | | | | | Avg Pwr (dBm) | Tune-up Pwr (dBm) | Avg Pwr (dBm) | Tune-up Pwr (dBm) | |
| 5.2GHz (U-NII-1) | 802.11a | 6Mbps | 36 | 5180 | NR ^{1,2} | 15.00 | NR ^{1,2} | 15.00 | No ² |
| | | | 40 | 5200 | | 15.00 | | 15.00 | |
| | | | 44 | 5220 | | 15.00 | | 15.00 | |
| | | | 48 | 5240 | | 15.00 | | 15.00 | |
| | 802.11n20 | HT0 | 36 | 5180 | | 15.00 | | 15.00 | |
| | | | 40 | 5200 | | 15.00 | | 15.00 | |
| | | | 44 | 5220 | | 15.00 | | 15.00 | |
| | | | 48 | 5240 | | 15.00 | | 15.00 | |
| | 802.11ax20 | HE0 | 36 | 5180 | | 15.00 | | 15.00 | |
| | | | 40 | 5200 | | 15.00 | | 15.00 | |
| | | | 44 | 5220 | | 15.00 | | 15.00 | |
| | | | 48 | 5240 | | 15.00 | | 15.00 | |
| | 802.11n40 | HT0 | 38 | 5190 | | 15.00 | | 15.00 | |
| | | | 46 | 5230 | | 15.00 | | 15.00 | |
| | 802.11ax40 | HE0 | 38 | 5190 | | 15.00 | | 15.00 | |
| | | | 46 | 5230 | | 15.00 | | 15.00 | |
| 802.11ac80 | VHT0 | 42 | 5210 | 15.00 | 15.00 | | | | |
| 802.11ax80 | HE0 | 42 | 5210 | 15.00 | 15.00 | | | | |

Initial test configuration

1. NR: Not Required
2. When the same maximum output power is specified for both bands, begin SAR measurement in U-NII-2A band by applying the OFDM SAR requirements. If the highest reported SAR for a test configuration is ≤ 1.2 W/kg, SAR is not required for U-NII-1 band (see §B.5.2 in this document).
3. Additional conducted power measurement is required when reported SAR is > 1.2 W/kg. In case the subsequent test configuration and the channel bandwidth is smaller than the initial test configuration, all channels that overlap with the larger channel bandwidth in the initial configuration should be tested.
4. The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, lowest order 802.11 mode is selected (i.e. a, g, n, ac then ax)
5. When the reported SAR of the initial test configuration is > 0.8 W/kg, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is $=1.2$ W/kg or all required channels are tested.
6. When the highest reported SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure requirements, is adjusted by the ratio of the subsequent test configuration to the 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
7. SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the reported SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is >1.2 W/Kg or until all required channels are tested.

| Band | Mode | Data Rate | Ch # | Freq (MHz) | Main | | Aux | | SAR Test? |
|-------------------|------------|-----------|------|---------------------|---------------------|---------------------|---------------------|-------------------|-------------------|
| | | | | | Avg Pwr (dBm) | Tune-up Pwr (dBm) | Avg Pwr (dBm) | Tune-up Pwr (dBm) | |
| 5.3GHz (U-NII-2A) | 802.11a | 6Mbps | 52 | 5260 | NR ^{1,2,3} | 15.50 | NR ^{1,2,3} | 15.00 | No ^{2,5} |
| | | | 56 | 5280 | | 15.50 | | 15.00 | |
| | | | 60 | 5300 | | 15.50 | | 15.00 | |
| | | | 64 | 5320 | | 15.50 | | 15.00 | |
| | 802.11n20 | HT0 | 52 | 5260 | | 15.50 | | 15.00 | |
| | | | 56 | 5280 | | 15.50 | | 15.00 | |
| | | | 60 | 5300 | | 15.50 | | 15.00 | |
| | | | 64 | 5320 | | 15.50 | | 15.00 | |
| | 802.11ax20 | HE0 | 52 | 5260 | | 15.50 | | 15.00 | |
| | | | 56 | 5280 | | 15.50 | | 15.00 | |
| | | | 60 | 5300 | | 15.50 | | 15.00 | |
| | | | 64 | 5320 | | 15.50 | | 15.00 | |
| | 802.11n40 | HT0 | 54 | 5270 | | 15.50 | | 15.00 | |
| | | | 62 | 5310 | | 15.50 | | 15.00 | |
| | 802.11ax40 | HE0 | 54 | 5270 | | 15.50 | | 15.00 | |
| | | | 62 | 5310 | | 15.50 | | 15.00 | |
| 802.11ac80 | VHT0 | 58 | 5290 | 15.50 | 15.00 | | | | |
| 802.11ax80 | HE0 | 58 | 5290 | 15.50 | 15.00 | | | | |
| 802.11ac160 | VHT0 | 50 | 5250 | 15.50 | 15.00 | Yes | | | |
| 802.11ax160 | HE0 | 50 | 5250 | NR ^{1,2,3} | 15.50 | NR ^{1,2,3} | 15.00 | No ^{2,5} | |

Initial test configuration

1. NR: Not Required
2. The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, lowest order 802.11 mode is selected (i.e. a, g, n, ac then ax)
3. Additional conducted power measurement is required when reported SAR is > 1.2W/kg. In case the subsequent test configuration and the channel bandwidth is smaller than the initial test configuration, all channels that overlap with the larger channel bandwidth in the initial configuration should be tested.
4. When the reported SAR of the initial test configuration is > 0.8W/kg, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is ≤1.2W/kg or all required channels are tested.
5. When the highest reported SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure requirements, is adjusted by the ratio of the subsequent test configuration to the 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.
6. SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the reported SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is >1.2 W/Kg or until all required channels are tested.

B.2.2.2 5.6 (U-NII-2C)

| Band | Mode | Data Rate | Ch # | Freq (MHz) | Main | | Aux | | SAR Test? | | | |
|-------------------|-------------|-----------|------|------------|---------------------|---------------------|---------------------|-------------------|-------------------|---------------------|-------|-------------------|
| | | | | | Avg Pwr (dBm) | Tune-up Pwr (dBm) | Avg Pwr (dBm) | Tune-up Pwr (dBm) | | | | |
| 5.6GHz (U-NII-2C) | 802.11a | 6Mbps | 100 | 5500 | NR ^{1,3,4} | 15.50 | NR ^{1,3,4} | 15.00 | No ^{4,6} | | | |
| | | | 104 | 5520 | | 15.50 | | | | | | |
| | | | 108 | 5540 | | 15.50 | | | | | | |
| | | | 112 | 5560 | | 15.50 | | | | | | |
| | | | 116 | 5580 | | 15.50 | | | | | | |
| | | | 120 | 5600 | | 15.50 | | | | | | |
| | | | 124 | 5620 | | 15.50 | | | | | | |
| | | | 128 | 5640 | | 15.50 | | | | | | |
| | 802.11n20 | HT0 | 100 | 5500 | | 15.50 | | 15.00 | | | | |
| | | | 104 | 5520 | | 15.50 | | 15.00 | | | | |
| | | | 108 | 5540 | | 15.50 | | 15.00 | | | | |
| | | | 112 | 5560 | | 15.50 | | 15.00 | | | | |
| | | | 116 | 5580 | | 15.50 | | 15.00 | | | | |
| | | | 120 | 5600 | | 15.50 | | 15.00 | | | | |
| | | | 124 | 5620 | | 15.50 | | 15.00 | | | | |
| | | | 128 | 5640 | | 15.50 | | 15.00 | | | | |
| | 802.11ax20 | HE0 | 100 | 5500 | | 15.50 | | 15.00 | | | | |
| | | | 104 | 5520 | | 15.50 | | 15.00 | | | | |
| | | | 108 | 5540 | | 15.50 | | 15.00 | | | | |
| | | | 112 | 5560 | | 15.50 | | 15.00 | | | | |
| | | | 116 | 5580 | | 15.50 | | 15.00 | | | | |
| | | | 120 | 5600 | | 15.50 | | 15.00 | | | | |
| | | | 124 | 5620 | | 15.50 | | 15.00 | | | | |
| | | | 128 | 5640 | | 15.50 | | 15.00 | | | | |
| | 802.11n40 | HT0 | 102 | 5510 | | 15.50 | | 15.00 | | | | |
| | | | 110 | 5550 | | 15.50 | | 15.00 | | | | |
| | | | 118 | 5590 | | 15.50 | | 15.00 | | | | |
| | | | 126 | 5630 | | 15.50 | | 15.00 | | | | |
| | 802.11ax40 | HE0 | 102 | 5510 | | 15.50 | | 15.00 | | | | |
| | | | 110 | 5550 | | 15.50 | | 15.00 | | | | |
| | | | 118 | 5590 | | 15.50 | | 15.00 | | | | |
| | | | 126 | 5630 | | 15.50 | | 15.00 | | | | |
| | 802.11ac80 | VHT0 | 106 | 5530 | | 15.50 | | 15.00 | | | | |
| | | | 122 | 5610 | | 15.50 | | 15.00 | | | | |
| | 802.11ax80 | HE0 | 106 | 5530 | | 15.50 | | 15.00 | | | | |
| | | | 122 | 5610 | | 15.50 | | 15.00 | | | | |
| | 802.11ac160 | VHT0 | 114 | 5570 | | 15.50 | | 15.00 | | 15.00 | 15.00 | Yes |
| | 802.11ax160 | HE0 | 114 | 5570 | | NR ^{1,3,4} | | 15.50 | | NR ^{1,3,4} | 15.00 | No ^{4,6} |

Initial test configuration

1. NR: Not Required
2. When band gap channels between U-NII-2C and U-NII-3 band are supported channels in U-NII-2C band below 5.65 GHz are considered as one band and channels above 5.65 GHz, together with channels in 5.8 GHz U-NII-3 or §15.247 band, are considered as a separate band
3. Additional conducted power measurement is required when reported SAR is $> 1.2\text{W/kg}$. In case the subsequent test configuration and the channel bandwidth is smaller than the initial test configuration, all channels that overlap with the larger channel bandwidth in the initial configuration should be tested
4. The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, lowest order 802.11 mode is selected (i.e. a, g, n, ac then ax)
5. When the reported SAR of the initial test configuration is $> 0.8\text{W/kg}$, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is $\leq 1.2\text{W/kg}$ or all required channels are tested.
6. When the highest reported SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure requirements, is adjusted by the ratio of the subsequent test configuration to the initial test configuration specified maximum output power and the adjusted SAR is $\leq 1.2\text{ W/Kg}$, SAR is not required for that subsequent test configuration.
7. SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the reported SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is $> 1.2\text{ W/Kg}$ or until all required channels are tested.

B.2.2.3 5.8GHz (U-NII-3)

| Band | Mode | Data Rate | Ch # | Freq (MHz) | Main | | Aux | | SAR Test? | | | |
|----------------------|------------|-----------|------|------------|---------------------|---------------------|---------------------|-------------------|-------------------|---------------------|-------|-------------------|
| | | | | | Avg Pwr (dBm) | Tune-up Pwr (dBm) | Avg Pwr (dBm) | Tune-up Pwr (dBm) | | | | |
| 5.6-5.8GHz (U-NII-3) | 802.11a | 6Mbps | 132 | 5660 | NR ^{1,3,4} | 15.50 | NR ^{1,3,4} | 15.00 | No ^{4,6} | | | |
| | | | 136 | 5680 | | 15.50 | | 15.00 | | | | |
| | | | 140 | 5700 | | 15.50 | | 15.00 | | | | |
| | | | 149 | 5745 | | 17.00 | | 16.00 | | | | |
| | | | 153 | 5765 | | 17.00 | | 16.00 | | | | |
| | | | 157 | 5785 | | 17.00 | | 16.00 | | | | |
| | | | 161 | 5805 | | 17.00 | | 16.00 | | | | |
| | | | 165 | 5825 | | 17.00 | | 16.00 | | | | |
| | 802.11n20 | HT0 | 132 | 5660 | | 15.50 | | 15.00 | | | | |
| | | | 136 | 5680 | | 15.50 | | 15.00 | | | | |
| | | | 140 | 5700 | | 15.50 | | 15.00 | | | | |
| | | | 149 | 5745 | | 17.00 | | 16.00 | | | | |
| | | | 153 | 5765 | | 17.00 | | 16.00 | | | | |
| | | | 157 | 5785 | | 17.00 | | 16.00 | | | | |
| | | | 161 | 5805 | | 17.00 | | 16.00 | | | | |
| | | | 165 | 5825 | | 17.00 | | 16.00 | | | | |
| | 802.11ax20 | HE0 | 132 | 5660 | | 15.50 | | 15.00 | | | | |
| | | | 136 | 5680 | | 15.50 | | 15.00 | | | | |
| | | | 140 | 5700 | | 15.50 | | 15.00 | | | | |
| | | | 149 | 5745 | | 17.00 | | 16.00 | | | | |
| | | | 153 | 5765 | | 17.00 | | 16.00 | | | | |
| | | | 157 | 5785 | | 17.00 | | 16.00 | | | | |
| | | | 161 | 5805 | | 17.00 | | 16.00 | | | | |
| | | | 165 | 5825 | | 17.00 | | 16.00 | | | | |
| | 802.11n40 | HT0 | 134 | 5670 | | 15.50 | | 15.00 | | | | |
| | | | 142 | 5710 | | 15.50 | | 15.00 | | | | |
| | | | 151 | 5755 | | 17.00 | | 16.00 | | | | |
| | | | 159 | 5795 | | 17.00 | | 16.00 | | | | |
| | 802.11ax40 | HE0 | 134 | 5670 | | 15.50 | | 15.00 | | | | |
| | | | 142 | 5710 | | 15.50 | | 15.00 | | | | |
| | | | 151 | 5755 | | 17.00 | | 16.00 | | | | |
| | | | 159 | 5795 | | 17.00 | | 16.00 | | | | |
| | 802.11ac80 | VHT0 | 138 | 5690 | | 15.50 | | 15.00 | | No ^{2,5} | | |
| | | | 155 | 5775 | | 17.00 | | 16.00 | | Yes | | |
| | 802.11ax80 | HE0 | 138 | 5690 | | NR ^{1,3,4} | | 15.50 | | NR ^{1,3,4} | 15.00 | No ^{4,6} |
| | | | 155 | 5775 | | | | 17.00 | | | 16.00 | |

Initial test configuration

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1. NR: Not Required
2. When band gap channels between U-NII-2C and U-NII-3 band are supported channels in U-NII-2C band below 5.65 GHz are considered as one band and channels above 5.65 GHz, together with channels in 5.8 GHz U-NII-3 or §15.247 band, are considered as a separate band
3. Additional conducted power measurement is required when reported SAR is $> 1.2\text{W/kg}$. In case the subsequent test configuration and the channel bandwidth is smaller than the initial test configuration, all channels that overlap with the larger channel bandwidth in the initial configuration should be tested
4. The initial test configuration for 2.4 GHz and 5 GHz OFDM transmission modes is determined by the 802.11 configuration with the highest maximum output power specified for production units, including tune-up tolerance, in each standalone and aggregated frequency band. SAR for the initial test configuration is measured using the highest maximum output power channel determined by the default power measurement procedures. When multiple transmission modes (802.11a/g/n/ac) have the same specified maximum output power, largest channel bandwidth, lowest order modulation and lowest data rate, lowest order 802.11 mode is selected (i.e. a, g, n, ac then ax)
5. When the reported SAR of the initial test configuration is $> 0.8\text{W/kg}$, SAR measurement is required for the subsequent next highest measured output power channel(s) in the initial test configuration until reported SAR is $\leq 1.2\text{W/kg}$ or all required channels are tested.
6. When the highest reported SAR for the initial test configuration (when applicable, include subsequent highest output channels), according to the initial test position or fixed exposure requirements, is adjusted by the ratio of the subsequent test configuration to the initial test configuration specified maximum output power and the adjusted SAR is $\leq 1.2\text{ W/Kg}$, SAR is not required for that subsequent test configuration.
7. SAR for subsequent highest measured maximum output power channels in the subsequent test configuration is required only when the reported SAR of the preceding higher maximum output power channel(s) in the subsequent test configuration is $> 1.2\text{ W/Kg}$ or until all required channels are tested.

B.2.3 Bluetooth

| Band | Mode | Data Rate | Channel | Frequency (MHz) | Antenna | Avg Pwr (dBm) | Tune-up Pwr (dBm) |
|--------|----------------|--------------------------|---------|-----------------|---------|-----------------|-------------------|
| 2.4GHz | Bluetooth v5.0 | Basic rate GFSK | 0 | 2402 | Aux | 8.80 | 10.50 |
| | | | 39 | 2441 | | 9.30 | 10.50 |
| | | | 78 | 2480 | | 9.70 | 10.50 |
| | Bluetooth V5.0 | Basic rate $\pi/4$ DQPSK | 0 | 2402 | | NR ¹ | 8.00 |
| | | | 39 | 2441 | | | 8.00 |
| | | | 78 | 2480 | | | 8.00 |
| | Bluetooth v5.0 | Basic rate 8-DPSK | 0 | 2402 | | | 7.00 |
| | | | 39 | 2441 | | | 7.00 |
| | | | 78 | 2480 | | | 7.00 |
| | Bluetooth v5.0 | Low energy GFSK | 0 | 2412 | | | 7.00 |
| | | | 20 | 2442 | | | 7.00 |
| | | | 39 | 2480 | | | 7.00 |

Initial test configuration

1. NR: Not Required

B.3 Tissue Parameters Measurement

Body TSL

| Freq. (MHz) | Target Parameters | | Measured TSL Parameters | | Deviation (%) | | Date |
|-------------|-------------------|----------------|-------------------------|----------------|---------------|----------|------------|
| | ϵ' (F/m) | σ (S/m) | ϵ' (F/m) | σ (S/m) | ϵ' | σ | |
| 2450 | 52.70 | 1.95 | 52.27 | 2.10 | -0.82 | 7.69 | 2019-11-07 |
| 5300 | 48.88 | 5.41 | 46.88 | 5.71 | -4.09 | 5.55 | 2019-11-07 |
| 5600 | 48.47 | 5.76 | 46.24 | 6.14 | -4.60 | 6.60 | 2019-11-07 |
| 5800 | 48.20 | 6.00 | 45.72 | 6.43 | -5.15 | 7.17 | 2019-11-07 |

See 1 for more details.

B.4 System Check Measurements

Body Measurements

| Frequency (MHz) | Average | Target SAR (W/Kg) | Measured SAR (W/Kg) | Deviation to target (%) | Limit (%) | Date |
|-----------------|---------|-------------------|---------------------|-------------------------|-----------|------------|
| 2450 | 1g | 49.40 | 51.60 | 4.45 | ±10 | 2019-11-07 |
| | 10g | 23.20 | 23.80 | 2.59 | | 2019-11-07 |
| 5300 | 1g | 73.90 | 77.20 | 4.47 | | 2019-11-07 |
| | 10g | 20.70 | 22.20 | 7.25 | | 2019-11-07 |
| 5600 | 1g | 77.70 | 83.00 | 6.82 | | 2019-11-07 |
| | 10g | 21.60 | 23.40 | 8.33 | | 2019-11-07 |
| 5800 | 1g | 73.80 | 78.40 | 6.23 | | 2019-11-07 |
| | 10g | 20.40 | 22.20 | 8.82 | | 2019-11-07 |

See Annex C for more details.

B.5 SAR Test Results

B.5.1 802.11b/g/n/ax – 2.4GHz - DTS

| Ant. | Mode Data rate | BW (MHz) | Ch # | Freq (MHz) | Position | Correct. Factor (dB) | SAR 1g (W/kg) | Reported SAR 1g (W/kg) | Plot # |
|------|----------------|----------|------|------------|----------|----------------------|---------------|------------------------|--------|
| Main | 802.11b 1Mbps | 20 | 1 | 2412 | Laptop | 0.00 | 0.36 | 0.36 | 1 |
| Aux | 802.11b 1Mbps | 20 | 1 | 2412 | Laptop | 0.05 | 0.39 | 0.39 | 2 |

B.5.2 802.11a/n/ac/ax – 5.3 GHz – U-NII-2A

| Ant. | Mode Data rate | BW (MHz) | Ch # | Freq (MHz) | Position | Correct. Factor (dB) | SAR 1g (W/kg) | Reported SAR 1g (W/kg) | Plot # |
|------|----------------|----------|------|------------|----------|----------------------|---------------|------------------------|--------|
| Main | 802.11ac VHT0 | 160 | 50 | 5250 | Laptop | 0.00 | 0.82 | 0.82 | 3 |
| Aux | 802.11ac VHT0 | 160 | 50 | 5250 | Laptop | 0.00 | 0.86 | 0.86 | 4 |

B.5.3 802.11a/n/ac/ax – 5.6 GHz – U-NII-2C

| Ant. | Mode Data rate | BW (MHz) | Ch # | Freq (MHz) | Position | Correct. Factor (dB) | SAR 1g (W/kg) | Reported SAR 1g (W/kg) | Plot # |
|------|----------------|----------|------|------------|----------|----------------------|---------------|------------------------|--------|
| Main | 802.11ac VHT0 | 160 | 114 | 5570 | Laptop | 0.00 | 0.60 | 0.60 | 5 |
| Aux | 802.11ac VHT0 | 160 | 114 | 5570 | Laptop | 0.00 | 0.79 | 0.79 | 6 |

B.5.4 802.11a/n/ac/ax – 5.8 GHz – U-NII-3

| Ant. | Mode Data rate | BW (MHz) | Ch # | Freq (MHz) | Position | Correct. Factor (dB) | SAR 1g (W/kg) | Reported SAR 1g (W/kg) | Plot # |
|------|----------------|----------|------|------------|----------|----------------------|---------------|------------------------|--------|
| Main | 802.11ac VHT0 | 80 | 155 | 5775 | Laptop | 0.00 | 0.47 | 0.47 | 7 |
| Aux | 802.11ac VHT0 | 80 | 155 | 5775 | Laptop | 0.00 | 0.71 | 0.71 | 8 |

B.5.5 Bluetooth – 2.4GHz - DSS

| Mode Data rate | BW (MHz) | Ch # | Freq (MHz) | Position | Correct.Factor (dB) | SAR 1g (W/kg) | Reported SAR 1g (W/kg) | Plot # |
|----------------|----------|------|------------|----------|---------------------|---------------|------------------------|--------|
| 802.15 DH5 | 1 | 78 | 2480 | Laptop | 0.80 | 0.11 | 0.13 | 9 |

B.5.6 SAR Measurement Variability

According to FCC OET KDB 865664, SAR Measurement variability is assessed when the maximum initial measured SAR is ≥ 0.8 W/kg for a certain band/mode. If the measured SAR value of the initial repeated measurement is < 1.45 W/kg with $< 20\%$ variation, only one repeated measurement is required to confirm that the results are not expected to have substantial variations.

A second repeated measurement is required only if the measured results for the initial repeated measurement are within 10% of the SAR limit or vary by more than 20%.

A third repeated measurement is required only if the original, first or second repeated measurement ≥ 1.5 W/Kg and the ratio of largest to smallest SAR for the original, first and second repeated measurement is > 1.2 .

| Band / Mode | Position | Ch # | Freq. (MHz) | Measured SAR 1g (W/kg) | 1 st Repeated SAR 1g (W/Kg) | 2 nd Repeated SAR 1g (W/Kg) | Highest Ratio |
|-------------------------------|----------|------|-------------|------------------------|--|--|---------------|
| 5.3GHz 802.11ac160 VHT0 | Laptop | 50 | 5250 | 0.86 | 0.84 | | 1.02 |

B.5.7 Simultaneous Transmission SAR Evaluation

According to FCC OET KDB 447498 D01, when the sum of 1g SAR for all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit, SAR test exclusion applies to that simultaneous transmission configuration.

All the values stated in the table below are the worst case found for standalone measurement with disregard of the transmission mode or channel where the worst case was found

| Antenna | Position | Highest Reported SAR (1g) (W/Kg) | | |
|---------|----------|----------------------------------|-----------|-----------|
| | | WLAN 2.4GHz | WLAN 5GHz | Bluetooth |
| Main | Laptop | 0.36 | 0.82 | |
| Aux | Laptop | 0.39 | 0.86 | 0.13 |

| Position | Simultaneous Tx Antenna Combination | | Σ SAR 1g (W/Kg) | Limit (W/kg) |
|----------|-------------------------------------|----------------|------------------------|--------------|
| | Main Antenna | Aux Antenna | | |
| Laptop | WLAN 5GHz | WLAN 5GHz | 1.68 | 1.6 |
| | WLAN 5GHz | WLAN 5GHz + BT | 1.81 | |
| | WLAN 5GHz | BT | 0.95 | |
| | WLAN 2.4GHz | WLAN 2.4GHz | 0.75 | |
| | WLAN 2.4GHz | BT | 0.49 | |

In case the sum of SAR is larger than the limit, SAR test exclusion is determined by the SAR to peak location separation ratio:

| Position | Antenna | Reported SAR 1g (W/kg) | Σ SAR 1g (W/Kg) | Peak Location (mm) (x,y,z) | SAR to peak location separation ratio | Limit |
|----------|----------------|------------------------|------------------------|----------------------------|---------------------------------------|-------|
| Laptop | Main WLAN 5GHz | 0.82 | 1.68 | (88.0; -139.0; -176.6) | 0.01 | 0.04 |
| | Aux WLAN 5GHz | 0.86 | | (90.0; 140.0; -176.4) | | |
| Laptop | Main WLAN 5GHz | 0.82 | 1.81 | (88.0; -139.0; -176.6) | 0.01 | |
| | Aux WLAN 5GHz | 0.86 | | (90.0; 140.0; -176.4) | | |
| | Aux BT | 0.13 | | (118.0; 154.8; -176.3) | | |

* The worst case for simultaneous SAR to peak location separation ratio calculation was made considering the sum of 3 SAR results and the closest maxima distance between Main and Aux antenna (i.e. the closest distance between the peak location between Main WLAN to Aux WLAN and Main WLAN to Aux BT).

Considering the results described above and according to the simultaneous transmission evaluation exclusions described in FCC OET KDB 447498 D01, no enlarged zoom scan measurements are required

Annex C. Test System Plots

| | |
|---|----|
| 1. DTS - 802.11b, CH1, Main Antenna - Laptop | 38 |
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| 8. UNII-3 - 802.11ac, CH155, Aux Antenna - Laptop | 45 |
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| 11. System Check Body Liquid 5300.0MHz | 48 |
| 12. System Check Body Liquid 5600.0MHz | 49 |
| 13. System Check Body Liquid 5800.0MHz | 50 |

1. DTS - 802.11b, CH1, Main Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-------------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 2.4GHz | WCDMA, 10012-CAB | 2412.0, 1 | 7.76 | 2.06 | 52.3 |

Hardware Setup

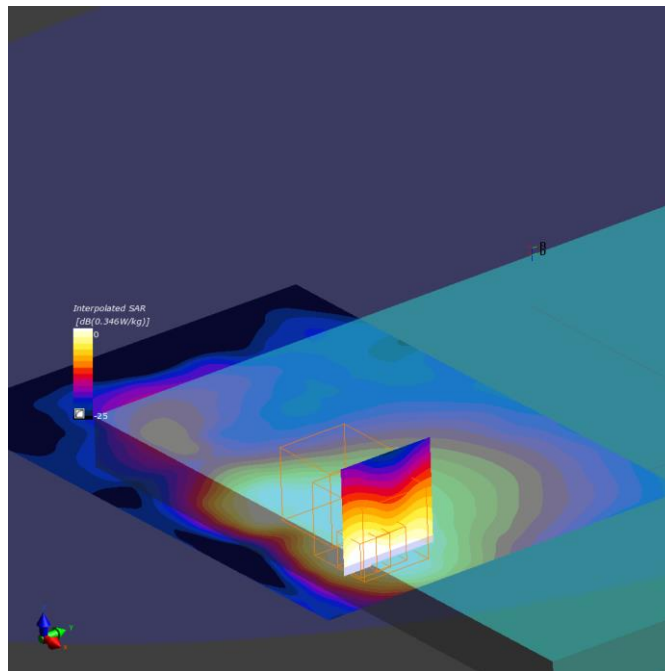
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 168.0 x 120.0 | 30.0 x 30.0 x 30.0 |
| Grid Steps [mm] | 12.0 x 12.0 | 5.0 x 5.0 x 5.0 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | No |
| Grading Ratio | n/a | n/a |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 11:26 | 2019-11-07, 11:33 |
| SAR 1g [W/Kg] | 0.278 | 0.356 |
| SAR 10g [W/Kg] | 0.151 | 0.154 |
| Power Drift [dB] | 0.01 | 0.03 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



2. DTS - 802.11b, CH1, Aux Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-------------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 2.4GHz | WCDMA, 10012-CAB | 2412.0, 1 | 7.76 | 2.06 | 52.3 |

Hardware Setup

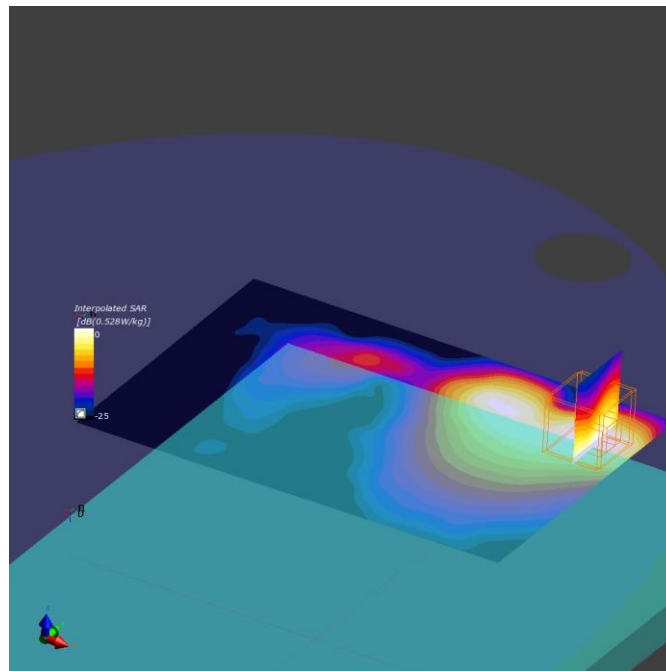
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MBBL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 168.0 x 120.0 | 30.0 x 30.0 x 30.0 |
| Grid Steps [mm] | 12.0 x 12.0 | 5.0 x 5.0 x 5.0 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | No |
| Grading Ratio | n/a | n/a |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 11:38 | 2019-11-07, 11:45 |
| SAR 1g [W/Kg] | 0.399 | 0.389 |
| SAR 10g [W/Kg] | 0.195 | 0.169 |
| Power Drift [dB] | -0.03 | 0.08 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



3. UNII-2A - 802.11ac, CH50, Main Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10456-AAB | 5250.0, 50 | 4.46 | 5.63 | 47.0 |

Hardware Setup

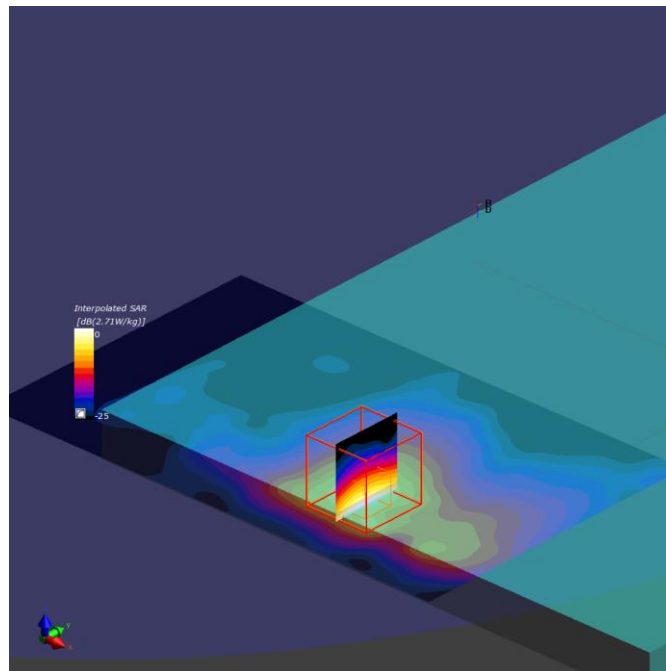
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MBBL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|---------------------|-------------------|-------------------|
| Date | 2019-11-07, 11:55 | 2019-11-07, 12:01 |
| SAR 1g [W/Kg] | 0.744 | 0.818 |
| SAR 10g [W/Kg] | 0.281 | 0.302 |
| Power Drift [dB] | -0.03 | 0.10 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor [dB] | | |
| TSL Correction | Positive only | Positive only |



4. UNII-2A - 802.11ac, CH50, Aux Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10456-AAB | 5250.0, 50 | 4.46 | 5.63 | 47.0 |

Hardware Setup

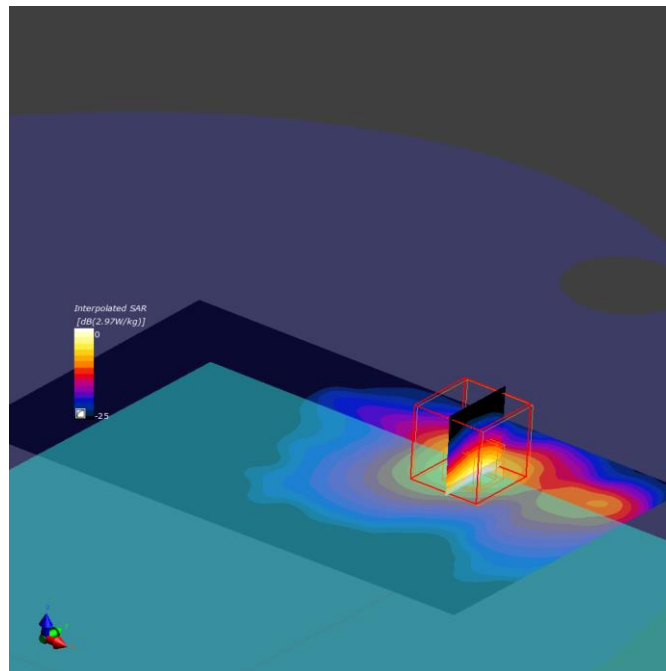
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 14:14 | 2019-11-07, 14:21 |
| SAR 1g [W/Kg] | 0.729 | 0.858 |
| SAR 10g [W/Kg] | 0.266 | 0.294 |
| Power Drift [dB] | 0.00 | 0.06 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



5. UNII-2C - 802.11ac, CH114, Main Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10456-AAB | 5570.0, 114 | 3.87 | 6.10 | 46.3 |

Hardware Setup

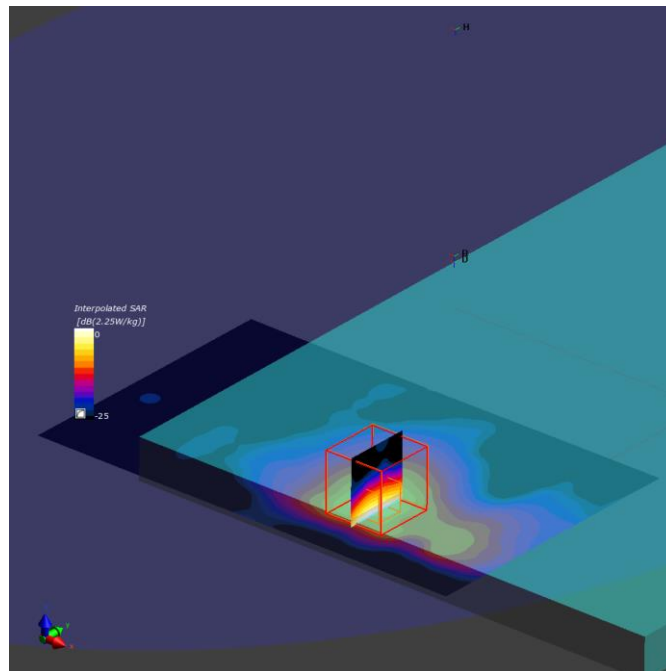
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MBBL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 13:30 | 2019-11-07, 13:36 |
| SAR 1g [W/Kg] | 0.525 | 0.603 |
| SAR 10g [W/Kg] | 0.198 | 0.213 |
| Power Drift [dB] | 0.02 | 0.06 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



6. UNII-2C - 802.11ac, CH114, Aux Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10456-AAB | 5570.0, 114 | 3.87 | 6.10 | 46.3 |

Hardware Setup

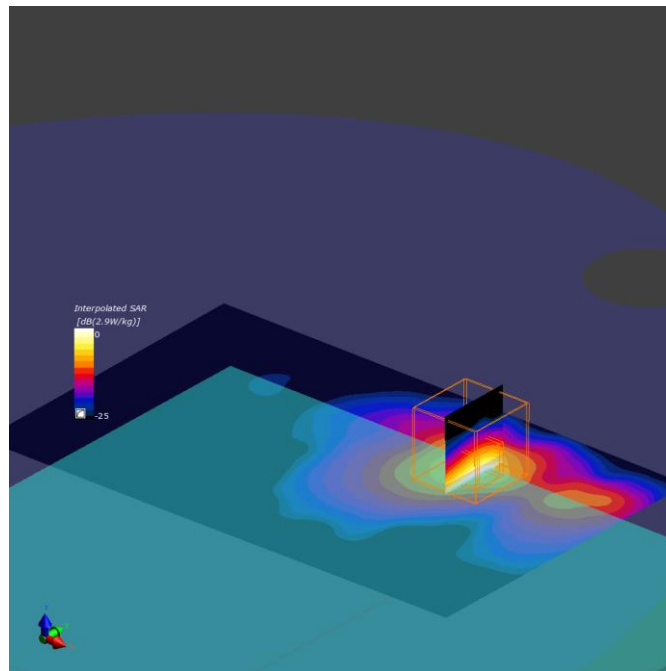
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 14:33 | 2019-11-07, 14:40 |
| SAR 1g [W/Kg] | 0.664 | 0.789 |
| SAR 10g [W/Kg] | 0.232 | 0.268 |
| Power Drift [dB] | 0.01 | -0.01 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



7. UNII-3 - 802.11ac, CH155, Main Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10402-AAD | 5775.0, 155 | 4.0 | 6.40 | 45.8 |

Hardware Setup

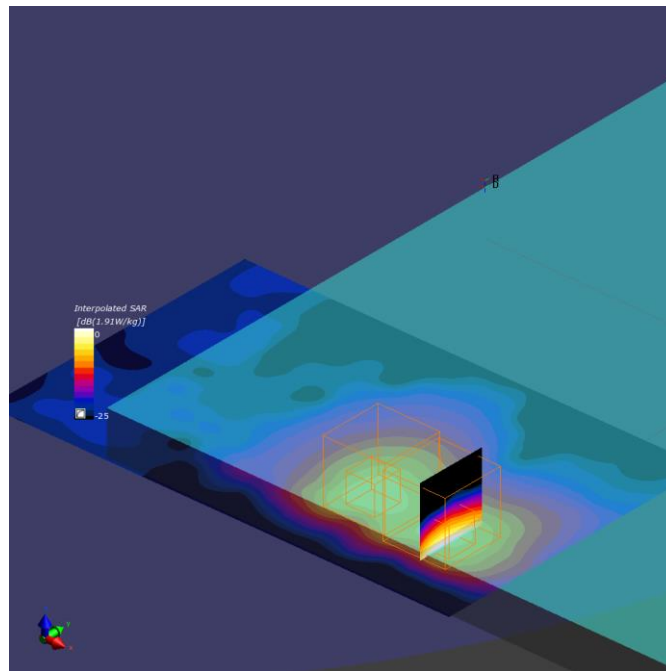
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|---------------------|-------------------|-------------------|
| Date | 2019-11-07, 13:41 | 2019-11-07, 13:48 |
| SAR 1g [W/Kg] | 0.437 | 0.469 |
| SAR 10g [W/Kg] | 0.172 | 0.165 |
| Power Drift [dB] | -0.05 | -0.06 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor [dB] | | |
| TSL Correction | Positive only | Positive only |



8. UNII-3 - 802.11ac, CH155, Aux Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:10 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|-----------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | WLAN 5GHz | WCDMA, 10402-AAD | 5775.0, 155 | 4.0 | 6.40 | 45.8 |

Hardware Setup

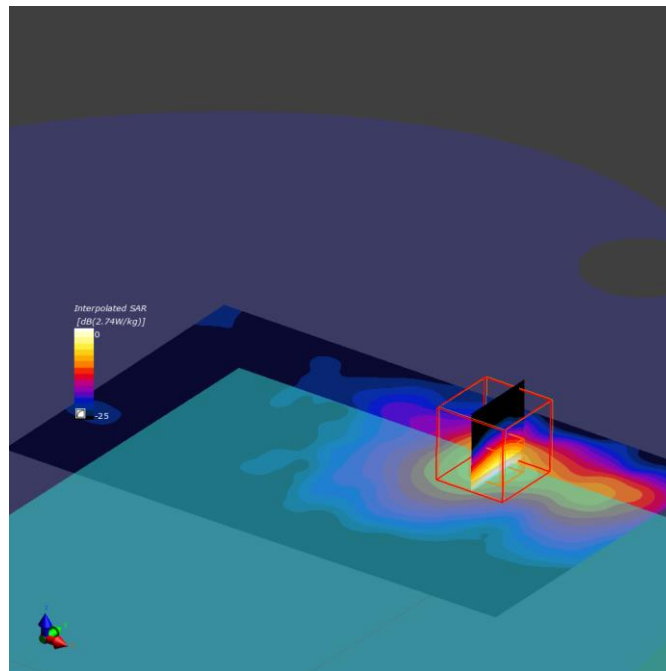
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 160.0 x 100.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|---------------------|-------------------|-------------------|
| Date | 2019-11-07, 14:46 | 2019-11-07, 14:52 |
| SAR 1g [W/Kg] | 0.602 | 0.710 |
| SAR 10g [W/Kg] | 0.210 | 0.240 |
| Power Drift [dB] | -0.04 | -0.01 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor [dB] | | |
| TSL Correction | Positive only | Positive only |



9. BT - 802.15, CH78, Aux Antenna - Laptop

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|-------------------------|----------------------|-------------------|----------|
| P117G Black Cover, Dell | 295.0 x 198.0 x 15.0 | 58:A0:23:EA:9B:14 | Laptop |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|------------------|------------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | BACK, 0.00 | ISM 2.4 GHz Band | WCDMA, 10032-CAA | 2480.0, 79 | 7.76 | 2.13 | 52.2 |

Hardware Setup

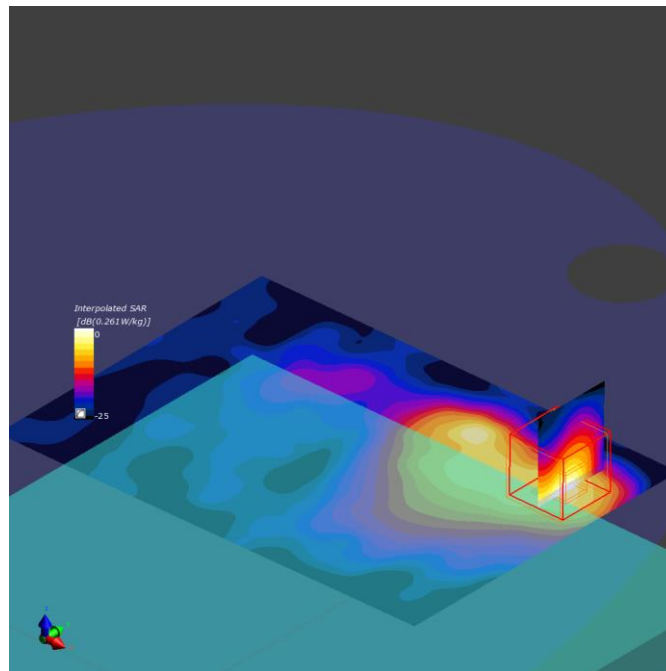
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 168.0 x 120.0 | 30.0 x 30.0 x 30.0 |
| Grid Steps [mm] | 12.0 x 12.0 | 5.0 x 5.0 x 5.0 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | No |
| Grading Ratio | n/a | n/a |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 15:04 | 2019-11-07, 15:11 |
| SAR 1g [W/Kg] | 0.087 | 0.106 |
| SAR 10g [W/Kg] | 0.042 | 0.044 |
| Power Drift [dB] | -0.18 | -0.15 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



10. System Check Body Liquid 2450.0MHz

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|--------------------|-------------------|-----|-------------------|
| 2450MHz Dipole | 50.0 x 10.0 x 8.0 | 937 | Validation Dipole |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|------|------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | , | | , 0-- | 2450.0, 0 | 7.76 | 2.10 | 52.3 |

Hardware Setup

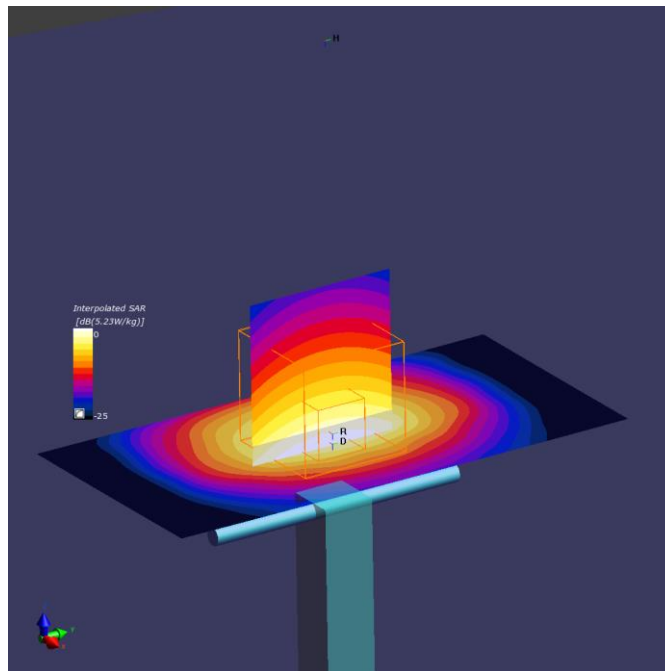
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 48.0 x 96.0 | 30.0 x 30.0 x 30.0 |
| Grid Steps [mm] | 12.0 x 12.0 | 5.0 x 5.0 x 5.0 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | No |
| Grading Ratio | n/a | n/a |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|---------------------|-------------------|-------------------|
| Date | 2019-11-07, 10:58 | 2019-11-07, 11:05 |
| SAR 1g [W/Kg] | 2.41 | 2.58 |
| SAR 10g [W/Kg] | 1.15 | 1.19 |
| Power Drift [dB] | -0.02 | -0.03 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor [dB] | | |
| TSL Correction | Positive only | Positive only |



11. System Check Body Liquid 5300.0MHz

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|--------------------|--------------------|------|-------------------|
| D5000G, SPEAG | 50.0 x 10.0 x 15.0 | 1259 | Validation Dipole |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|------|------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | , | | , 0-- | 5300.0, 0 | 4.46 | 5.71 | 46.9 |

Hardware Setup

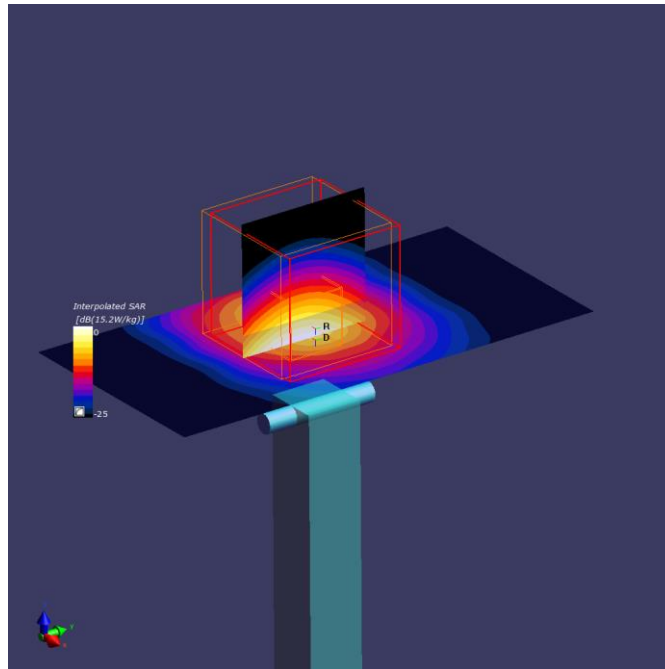
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 40.0 x 80.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 10:10 | 2019-11-07, 10:17 |
| SAR 1g [W/Kg] | 2.97 | 3.86 |
| SAR 10g [W/Kg] | 0.929 | 1.11 |
| Power Drift [dB] | -0.08 | 0.02 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



12. System Check Body Liquid 5600.0MHz

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|--------------------|--------------------|------|-------------------|
| D5000G, SPEAG | 50.0 x 10.0 x 15.0 | 1259 | Validation Dipole |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|------|------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | , | | 0-- | 5600.0, 0 | 3.87 | 6.14 | 46.2 |

Hardware Setup

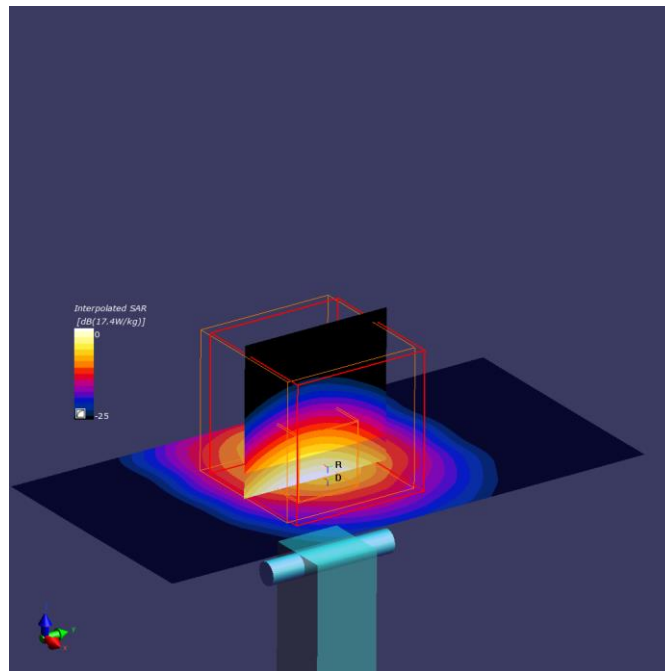
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MBBL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 40.0 x 80.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

| | Area Scan | Zoom Scan |
|------------------|-------------------|-------------------|
| Date | 2019-11-07, 10:28 | 2019-11-07, 10:35 |
| SAR 1g [W/Kg] | 3.26 | 4.15 |
| SAR 10g [W/Kg] | 1.02 | 1.17 |
| Power Drift [dB] | 0.00 | -0.01 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor | | |
| TSL Correction | Positive only | Positive only |



13. System Check Body Liquid 5800.0MHz

Device under Test Properties

| Name, Manufacturer | Dimensions [mm] | SN | DUT Type |
|--------------------|--------------------|------|-------------------|
| D5000G, SPEAG | 50.0 x 10.0 x 15.0 | 1259 | Validation Dipole |

Exposure Conditions

| Phantom Section, TSL | Position, Test Distance [mm] | Band | Group, UID | Frequency [MHz], Channel Number | Conversion Factor | TSL Conductivity [S/m] | TSL Permittivity |
|----------------------|------------------------------|------|------------|---------------------------------|-------------------|------------------------|------------------|
| Flat, MSL | , | | , 0-- | 5800.0, 0 | 4.0 | 6.43 | 45.7 |

Hardware Setup

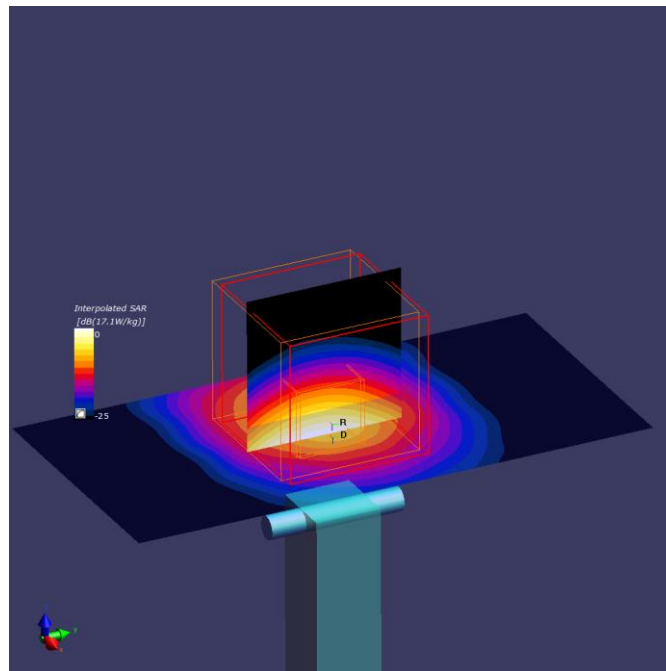
| Phantom | TSL, Measured Date | Probe, Calibration Date | DAE, Calibration Date |
|------------------------------------|---------------------------|-----------------------------|-------------------------|
| ELI V8.0 (20deg probe tilt) - 2059 | MABL-600-6000 2019-Nov-07 | EX3DV4 - SN7325, 2018-12-13 | DAE4 Sn1496, 2018-12-06 |

Scan Setup

| | Area Scan | Zoom Scan |
|---------------------|-------------------|--------------------|
| Grid Extents [mm] | 40.0 x 80.0 | 22.0 x 22.0 x 22.0 |
| Grid Steps [mm] | 10.0 x 10.0 | 4.0 x 4.0 x 1.4 |
| Sensor Surface [mm] | 3.0 | 1.4 |
| Graded Grid | No | Yes |
| Grading Ratio | n/a | 1.4 |
| MAIA | Confirmed by MAIA | Confirmed by MAIA |
| Surface Detection | Yes | Yes |
| Scan Method | Measured | Measured |

Measurement Results

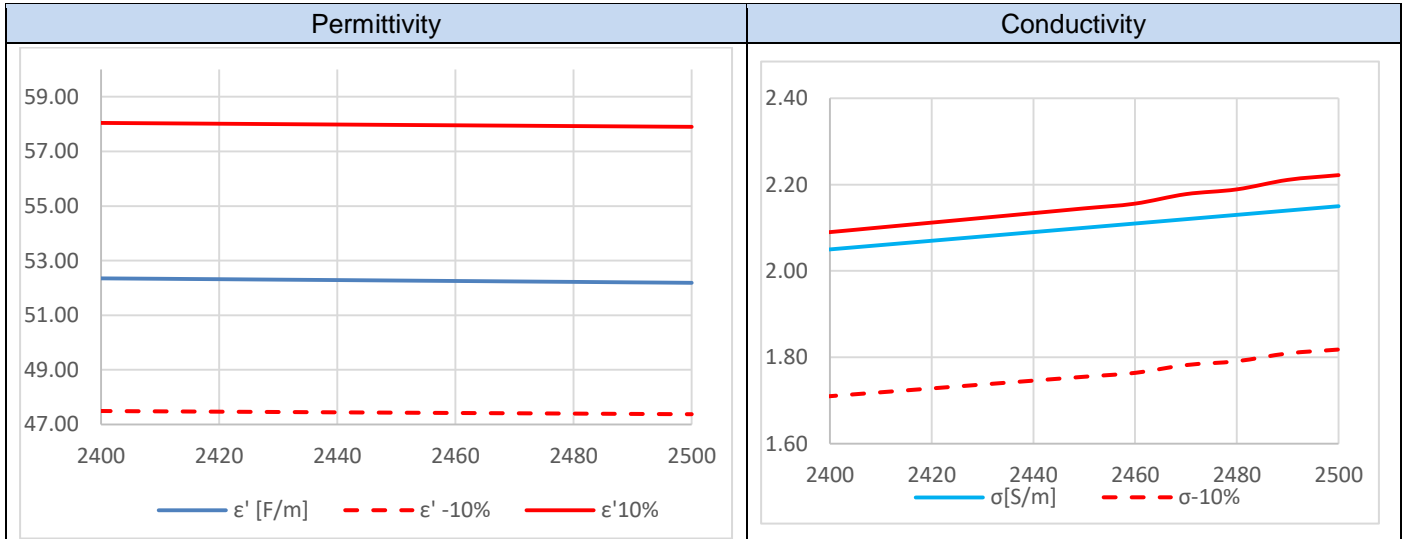
| | Area Scan | Zoom Scan |
|---------------------|-------------------|-------------------|
| Date | 2019-11-07, 10:45 | 2019-11-07, 10:51 |
| SAR 1g [W/Kg] | 3.05 | 3.92 |
| SAR 10g [W/Kg] | 0.945 | 1.11 |
| Power Drift [dB] | 0.01 | -0.04 |
| Power Scaling | Disabled | Disabled |
| Scaling Factor [dB] | | |
| TSL Correction | Positive only | Positive only |



Annex D. TSL Dielectric Parameters

D.1 Body DTS 2450MHz

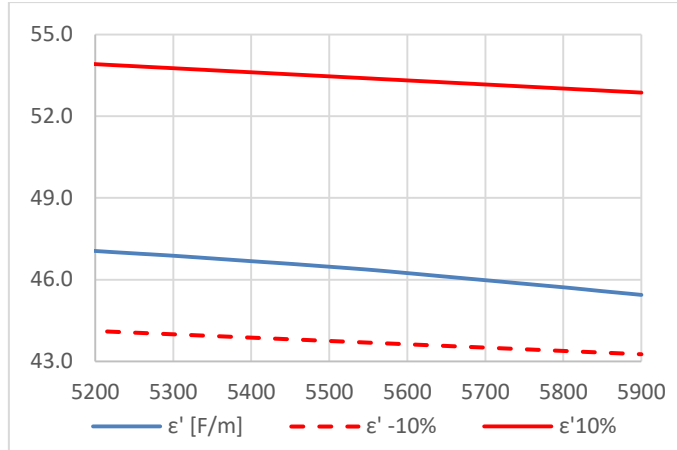
| Freq. (MHz) | Target | | 2019-11-07 Measured | |
|-------------|-------------------|----------------|---------------------|----------------|
| | ϵ' (F/m) | σ (S/m) | ϵ' (F/m) | σ (S/m) |
| | 2400 | 52.77 | 1.90 | 52.35 |
| 2410 | 52.75 | 1.91 | 52.33 | 2.06 |
| 2420 | 52.74 | 1.92 | 52.32 | 2.07 |
| 2430 | 52.73 | 1.93 | 52.30 | 2.08 |
| 2440 | 52.71 | 1.94 | 52.29 | 2.09 |
| 2450 | 52.70 | 1.95 | 52.27 | 2.10 |
| 2460 | 52.69 | 1.96 | 52.25 | 2.11 |
| 2470 | 52.67 | 1.98 | 52.24 | 2.12 |
| 2480 | 52.66 | 1.99 | 52.22 | 2.13 |
| 2490 | 52.65 | 2.01 | 52.20 | 2.14 |
| 2500 | 52.64 | 2.02 | 52.19 | 2.15 |



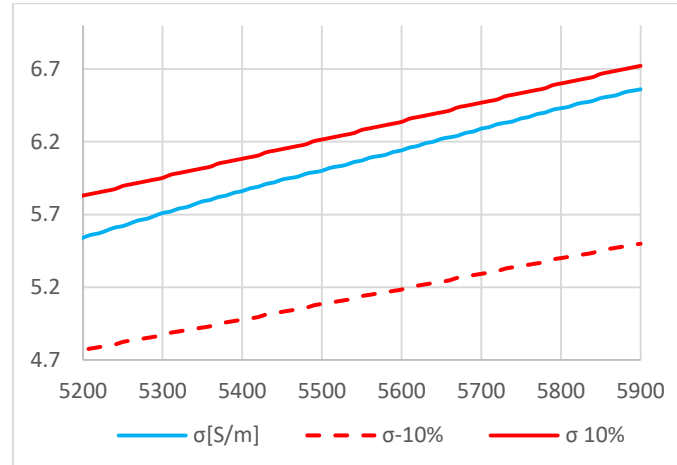
D.2 Body 5200MHz-5800MHz

| Freq. (MHz) | Target | | 2019-11-07 Measured | |
|----------------|-------------------|----------------|------------------------|----------------|
| | ϵ' (F/m) | σ (S/m) | ϵ' (F/m) | σ (S/m) |
| | 5180 | 49.04 | 5.27 | 47.09 |
| 5190 | 49.03 | 5.29 | 47.07 | 5.52 |
| 5200 | 49.01 | 5.30 | 47.05 | 5.54 |
| 5210 | 49.00 | 5.31 | 47.03 | 5.56 |
| 5220 | 48.99 | 5.32 | 47.02 | 5.57 |
| 5230 | 48.97 | 5.33 | 47.00 | 5.59 |
| 5240 | 48.96 | 5.34 | 46.98 | 5.61 |
| 5250 | 48.95 | 5.36 | 46.96 | 5.62 |
| 5260 | 48.93 | 5.37 | 46.95 | 5.64 |
| 5270 | 48.92 | 5.38 | 46.93 | 5.66 |
| 5280 | 48.91 | 5.39 | 46.91 | 5.67 |
| 5290 | 48.89 | 5.40 | 46.90 | 5.69 |
| 5300 | 48.88 | 5.41 | 46.88 | 5.71 |
| 5310 | 48.87 | 5.43 | 46.86 | 5.72 |
| 5320 | 48.85 | 5.44 | 46.84 | 5.74 |
| 5330 | 48.84 | 5.45 | 46.82 | 5.75 |
| 5340 | 48.82 | 5.46 | 46.80 | 5.77 |
| 5350 | 48.81 | 5.47 | 46.78 | 5.79 |
| 5360 | 48.80 | 5.48 | 46.76 | 5.80 |
| 5370 | 48.78 | 5.50 | 46.74 | 5.82 |
| 5380 | 48.77 | 5.51 | 46.72 | 5.83 |
| 5390 | 48.76 | 5.52 | 46.70 | 5.85 |
| 5400 | 48.74 | 5.53 | 46.68 | 5.86 |
| 5500 | 48.61 | 5.65 | 46.47 | 6.00 |
| 5510 | 48.59 | 5.66 | 46.45 | 6.02 |
| 5520 | 48.58 | 5.67 | 46.43 | 6.03 |
| 5530 | 48.57 | 5.68 | 46.41 | 6.04 |
| 5540 | 48.55 | 5.69 | 46.39 | 6.06 |
| 5550 | 48.54 | 5.71 | 46.37 | 6.07 |
| 5560 | 48.53 | 5.72 | 46.34 | 6.09 |
| 5570 | 48.51 | 5.73 | 46.32 | 6.10 |
| 5580 | 48.50 | 5.74 | 46.29 | 6.11 |
| 5590 | 48.49 | 5.75 | 46.27 | 6.13 |
| 5600 | 48.47 | 5.76 | 46.24 | 6.14 |
| 5610 | 48.46 | 5.78 | 46.21 | 6.16 |
| 5620 | 48.44 | 5.79 | 46.19 | 6.17 |
| 5630 | 48.43 | 5.80 | 46.16 | 6.19 |
| 5640 | 48.42 | 5.81 | 46.13 | 6.20 |
| 5650 | 48.40 | 5.82 | 46.11 | 6.22 |
| 5660 | 48.39 | 5.83 | 46.08 | 6.23 |
| 5670 | 48.38 | 5.85 | 46.06 | 6.24 |
| 5680 | 48.36 | 5.86 | 46.03 | 6.26 |
| 5690 | 48.35 | 5.87 | 46.00 | 6.27 |
| 5700 | 48.34 | 5.88 | 45.98 | 6.29 |
| 5710 | 48.32 | 5.88 | 45.95 | 6.30 |
| 5720 | 48.31 | 5.89 | 45.93 | 6.32 |
| 5730 | 48.30 | 5.91 | 45.90 | 6.33 |
| 5740 | 48.28 | 5.92 | 45.87 | 6.34 |
| 5750 | 48.27 | 5.93 | 45.85 | 6.36 |
| 5760 | 48.25 | 5.94 | 45.82 | 6.37 |
| 5770 | 48.24 | 5.95 | 45.80 | 6.39 |
| 5780 | 48.23 | 5.96 | 45.77 | 6.40 |
| 5790 | 48.21 | 5.98 | 45.74 | 6.42 |
| 5800 | 48.20 | 5.99 | 45.72 | 6.43 |
| 5810 | 48.19 | 6.00 | 45.69 | 6.44 |
| 5820 | 48.17 | 6.01 | 45.66 | 6.46 |
| 5830 | 48.16 | 6.02 | 45.63 | 6.47 |
| 5840 | 48.15 | 6.03 | 45.60 | 6.48 |
| 5850 | 48.13 | 6.05 | 45.58 | 6.50 |
| 5860 | 48.12 | 6.06 | 45.55 | 6.51 |
| 5870 | 48.10 | 6.07 | 45.52 | 6.52 |
| 5880 | 48.09 | 6.08 | 45.49 | 6.54 |
| 5890 | 48.08 | 6.09 | 45.47 | 6.55 |
| 5900 | 48.06 | 6.10 | 45.44 | 6.56 |




Permittivity



Conductivity



Annex E. Calibration Certificates

| ID | Device | Type/Model | Serial Number | Manufacturer | Calibration Certificate |
|------|----------------------------------|------------|---------------|--------------|---|
| 0260 | Dosimetric E-field Probe | EX3DV4 | 7325 | SPEAG |  |
| 0239 | 2450MHz System Validation Dipole | D2450V2 | 937 | SPEAG |  |
| 0591 | 5GHz System Validation Dipole | D5GHzV2 | 1259 | SPEAG |  |

Dipole calibration

According to the KDB 865664 D01, a dipole must be calibrated using a fully validated SAR system according to the tissue dielectric parameters and SAR probe calibration frequency required for device testing. However, instead of the typical annual calibration recommended by measurement standards, longer calibration intervals of up to three years may be considered when it is demonstrated that the SAR target, impedance and return loss of a dipole have remain stable according to the following requirements.

1. When the most recent return-loss result, measured at least annually, deviates by more than 20% from the previous measurement (i.e. value in dB \times 0.2) or not meeting the required 20 dB minimum return-loss requirement.
2. When the most recent measurement of the real or imaginary parts of the impedance, measured at least annually, deviates by more than 5 Ω from the previous measurement

The below results show the latest return loss and impedance measurements for each dipole performed by the lab:

| Dipole ID #0239 | | | |
|-------------------------|------------------|------------------------|------------|
| Dipole 2450MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -27.80 | 50.4 + 4.1 j | 2018-05-18 |
| Last | -27.70 | 46.3 + 3.1 j | 2019-03-13 |
| Dipole ID #0591 | | | |
| Dipole 5200MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -22.7 | 50.0 – 7.4 j | 2018-02-12 |
| Last | -22.8 | 47.6 – 3.9 j | 2019-03-13 |
| Dipole 5300MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -42.5 | 49.4 + 0.4 j | 2018-02-12 |
| Last | -42.5 | 52.9 + 1.4 j | 2019-03-13 |
| Dipole 5500MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -33.8 | 48.0 + 0.0 j | 2018-02-12 |
| Last | -33.9 | 49.9 + 2.8 j | 2019-03-13 |
| Dipole 5600MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -28.3 | 52.9 + 1.0 j | 2018-02-12 |
| Last | -28.5 | 50.1 + 1.0 j | 2019-03-13 |
| Dipole 5800MHz Body TSL | | | |
| | Return Loss [dB] | Impedance [Ω] | Date |
| Previous | -28.0 | 52.9 – 2.9 j | 2018-02-12 |
| Last | -28.0 | 53.3 + 2.9 j | 2019-03-13 |