FCC SAR Test Report

FCC ID: RWO-RC30035302

Project No.	:	2204E024A
Equipment	:	Wireless Keyboard
Brand Name	:	RAZER
Test Model	:	RZ03-0437
Series Model	:	RZ03-0437XXXX-XXXX (X can be 0-9 or A-Z)
Date of Receipt	:	Apr.26, 2022
Date of Test	:	May 27, 2022
Issued Date	:	Jun. 23, 2022
Report Version	:	R01
Test Sample	:	Engineering Sample No.: DG2022042899
Standard(s)	:	Please refer to page 2.
Applicant	:	Razer Inc.
Address	:	9 Pasteur, Suite 100, Irvine, CA92618, USA
Manufacturer	:	Razer (Asia-Pacific) Pte.,Ltd.
Address	:	1 one-north Crescent, #02-01 Singapore 138538
Factory	:	RAZER TECHNOLOGY AND DEVELOPMENT (SHENZHEN) CO., LTD
Address	:	East Wing, 3rd Floor, Block 2, Phase 1 of Vision Shenzhen Business Park Keji South Road, Hi-Tech Industrial Park, Shenzhen 518057, China

The above equipment has been tested and found compliance with the requirement of the relative standards by BTL Inc.

Prepared by : Seven Lu

Approved by : Herbort Liu

ilac-MRA

ACCREDITED

TESTING CERT #5123.02

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Standard(s)	:	**ANSI Std C95.1:1992** Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz. (IEEE Std C95.1-1991) **IEEE Std 1528:2013** Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques **KDB447498 D04** Interim General RF Exposure Guidance v01 **KDB248227 D01** 802.11 Wi-Fi SAR v02r02 **KDB865664 D01** SAR measurement 100 MHz to 6 GHz v01r04 **KDB865664 D02** SAR Reporting v01r02 **KDB690783 D01** SAR Listings on Grants v01r03

Declaration

BTL represents to the client that testing is done in accordance with standard procedures as applicable and that test instruments used has been calibrated with standards traceable to international standard(s) and/or national standard(s).

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BTL is not responsible for the sampling stage, so the results only apply to the sample as received.

The information, data and test plan are provided by manufacturer which may affect the validity of results, so it is manufacturer's responsibility to ensure that the apparatus meets the essential requirements of applied standards and in all the possible configurations as representative of its intended use.

Limitation

For the use of the authority's logo is limited unless the Test Standard(s)/Scope(s)/Item(s) mentioned in this test report is (are) included in the conformity assessment authorities acceptance respective.
Please note that the measurement uncertainty is provided for informational purpose only and are not use in determining the Pass/Fail results.

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REPORT ISSUED HISTORY

Report No.	Version	Description	Issued Date	Note
BTL-FCC SAR-1-2204E024A	R00	Original Report.	Jun. 22, 2022	Invalid
BTL-FCC SAR-1-2204E024A	R01	Updated model difference information.	Jun. 23, 2022	Valid

1. GENERAL INFORMATION

1.1 STATEMENT OF COMPLIANCE

Mode	Highest Reported Extremity SAR-10g (W/kg)
2.4G SRD	0.081
BLE	0.111

Note: The device is in compliance with Specific Absorption Rate (SAR) for general population uncontrolled exposure limits according to the FCC rule §2.1093, the ANSI C95.1:1992/IEEE C95.1:1991, the NCRP Report Number 86 for uncontrolled environment, and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013.

1.2 LABORATORY ENVIRONMENT

Temperature	Min. = 20ºC, Max. = 24ºC
Relative humidity	Min. = 30%, Max. = 70%
Ground system resistance	< 0.5Ω
Ambient noise is checked and found very low and in compliance with requirement of standards. Reflection of surrounding objects is minimized and in compliance with requirement of standards.	

1.3 GENERAL DESCRIPTION OF EUT

Equipment	Wireless Keyboard	
Test Model	RZ03-0437	
Series Model	RZ03-0437XXXX-XXXX (X can be 0-9 or A-Z)	
Model Difference(s)	The system's model name is RZ03-0437XXXX-XXXX(X can be 0-9 or A-Z), and the system contains a Wireless Keyboard (Model name: RZ03-0437) and USB Dongle (Model name: DGRFG7).	
Modulation	GFSK	
Operation Frequency Range(s)	Band	TX (MHz)
	2.4G SRD	2400~2483.5
	Bluetooth	2400~2483.5
Antenna Gain (dBi)	2.4G SRD	3.58
	Bluetooth	3.58
Other Information		
Battery	Model Name	FT5936E2P
	Normal Voltage	+3.7V
	Rated capacity	4200mAh, 15.54Wh

1.4 MAIN TEST INSTRUMENTS

Item	Equipment	Manufacturer	Model	Serial No.	Cal. Date	Cal. Interval
1	Data Acquisition Electronics	Speag	DAE4	1423	Jan. 21, 2022	1 Year
2	E-field Probe	Speag	EX3DV4	7544	Dec. 29, 2021	1 Year
3	System Validation Dipole	Speag	D2450V2	919	May 28, 2021	3 Years
4	ELI Phantom	Speag	ELI Phantom V5.0	1222	N/A	N/A
5	Power Amplifier	Mini-Circuits	ZHL-42W+	QA1333003	Dec. 26, 2021	1 Year
6	DC Source metter	Iteck	IT6154	0061041267682 01001	Jul. 24, 2021	1 Year
7	Signal Analyzer	R&S	FSV7	103120	Jul. 10, 2021	1 Year
8	Vector Network Analyzer	Agilent	E5071C	MY46102965	Feb. 19, 2022	1 Year
9	Signal Generator	Agilent	N5172B	MY53050758	Feb. 19, 2022	1 Year
10	Smart Power Sensor	R&S	NRP-Z21	102209	Feb. 19, 2022	1 Year
11	3.5mm Economy Calibration Kit	Agilent	85052D	MY43252246	Dec. 14, 2021	1 Year
12	Dielectric Assessment Kit	Speag	DAK-3.5	1226	N/A	N/A
13	Directional Coupler	Woken	TS-PCC0M-05	0107090019	Feb. 19, 2022	1 Year
14	Coupler	Woken	0110A05601O-10	COM5BNW1A2	Feb. 19, 2022	1 Year
15	Digital Themometer	TES	TES-1310	210706071	Dec. 07, 2021	1 Year

Note:
1. “N/A” denotes no model name, serial No. or calibration specified.
2.
1) Per KDB865664 D01 requirements for dipole calibration, the test laboratory has adopted three-year extended calibration interval. Each measured dipole is expected to evaluate with the following criteria at least on annual interval in Appendix C.
a) There is no physical damage on the dipole;
b) System check with specific dipole is within 10% of calibrated value;
c) The most recent return-loss result, measured at least annually, deviates by no more than 20% from the previous measurement;
d) The most recent measurement of the real or imaginary parts of the impedance, measured at least annually is within 5Ω from the previous measurement.
2) Network analyzer probe calibration against air, distilled water and a short block performed before measuring liquid parameters.

2. RF EMISSIONS MEASUREMENT

2.1 TEST FACILITY

The test facilities used to collect the test data in this report is SAR room at the location of Room 108, Building 2, No.1, Yile Road, Songshan Lake Zone, Dongguan City, Guangdong, People's Republic of China.
BTL's Designation Number for FCC: CN1240.

2.2 MEASUREMENT UNCERTAINTY

Note: Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

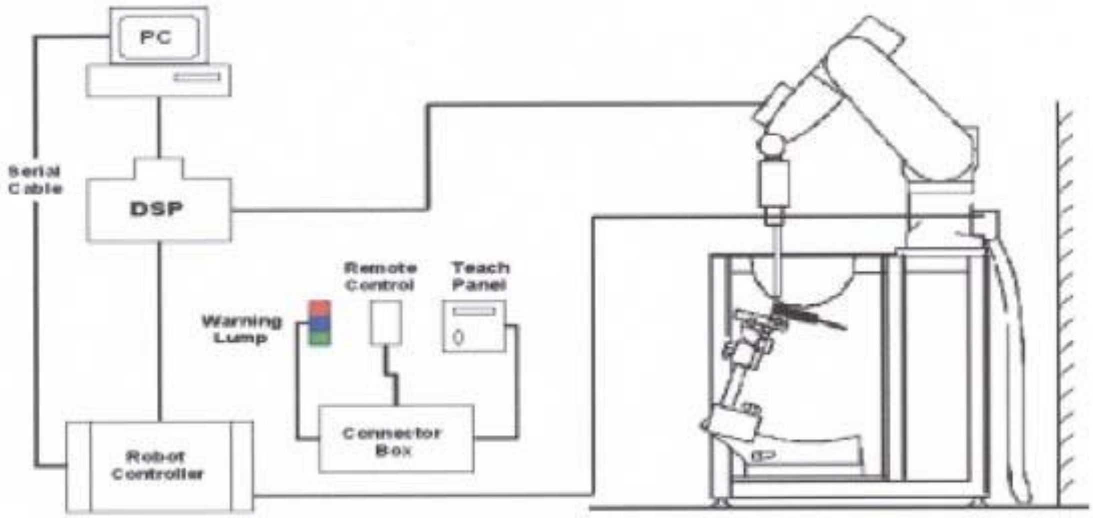
3. SAR MEASUREMENTS SYSTEM CONFIGURATION

3.1 SAR MEASUREMENT SET-UP

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

1. A standard high precision 6-axis robot (Stäubli RX family) with controller and software. An arm extension for accommodating the data acquisition electronics (DAE).
2. A dosimetric probe, i.e. an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.
3. A data acquisition electronic (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.
4. A unit to operate the optical surface detector which is connected to the EOC.
5. The Electro-Optical Coupler (EOC) performs the conversion from the optical into a digital electric signal of the DAE. The EOC is connected to the DASY5 measurement server.
6. TheDASY5 measurement server, which performs all real-time data evaluation for field measurements and surface detection, controls robot movements and handles safety operation. A computer operating Windows.
7. DASY5 software and SEMCAD data evaluation software.
8. Remote control with teach panel and additional circuitry for robot safety such as warning lamps, etc.
9. The generic twin phantom enabling the testing of left-hand and right-hand usage.
10. The device holder for handheld mobile phones.
11. Tissue simulating liquid mixed according to the given recipes.
12. System validation dipoles allowing to validate the proper functioning of the system.

3.1.1 TEST SETUP LAYOUT



3.2 DASY5 E-FIELD PROBE SYSTEM

The SAR measurements were conducted with the dosimetric probe EX3DV4 (manufactured by SPEAG), designed in the classical triangular configuration and optimized for dosimetrice valuation.

3.2.1 PROBE SPECIFICATION

EX3DV4

Construction	Symmetrical design with triangular core Interleaved sensors Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)
Calibration	ISO/IEC 17025 calibration service available
Frequency	10 MHz to 6 GHz Linearity: ± 0.2 dB (30 MHz to 6 GHz)
Directivity	± 0.3 dB in HSL (rotation around probe axis) ± 0.5 dB in tissue material (rotation normal to probe axis)
Dynamic Range	10 μW/g to > 100 mW/g Linearity:± 0.2dB
Dimensions	Overall length: 330 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.0 mm

E-field Probe

3.2.2 E-FIELD PROBE CALIBRATION

Eachprobeiscalibratedaccordingtoadosimetricassessmentprocedurewithaccuracybetterthan±10%. The spherical isotropy was evaluatedandfoundtobebetterthan±0.25dB. The sensitivity parameters (NormX, NormY, NormZ), the diode compression parameter (DCP) and the conversion factor (ConvF) of the probe are tested.

The free space E-field from amplified probe outputs is determined in a test chamber. This is performed in a TEM cell for frequencies bellow 1 GHz, and in a wave guide above 1 GHz for free space. For the free space calibration, the probe is placed in the volumetric center of the cavity and at the proper orientation with the field. The probe is then rotated 360 degrees.

E-field temperature correlation calibration is performed in a flat phantom filled with the appropriate simulated brain tissue. The measured free space E-field in the medium correlates to temperature rise in a dielectric medium. For temperature correlation calibration a RF transparent thermistor-based temperature probe is used in conjunction with the E-field probe.

$$\mathbf{SAR} = \mathbf{C}\frac{\Delta T}{\Delta t}$$

Where: Δt=Exposure time (30 seconds),

C =Heat capacity of tissue (brain or muscle),

ΔT=Temperature increase due to RF exposure.

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

Where: σ=Simulated tissue conductivity,

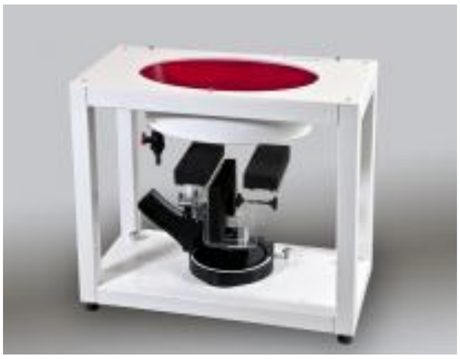
ρ=Tissue density (kg/m3).

3.2.3 OTHER TEST EQUIPMENT

3.2.3.1 Device Holder for Transmitters

Construction: Simple but effective and easy-to-use extension for Mounting Device that facilitates the testing of larger devices (e.g., laptops, cameras, etc.) It is 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 SAM v6.0 Phantoms.
Material: POM, Acrylic glass, Foam

3.2.3.2 Phantom

Model	ELI Phantom	
Construction	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.	
Shell Thickness	2±0.1 mm	
Filling Volume	Approx. 30 liters	
Dimensions	Length: 600 mm; Width: 190mm Height: adjustable feet	
Aailable	Special	

3.2.4 SCANNING PROCEDURE

The DASY5 installation includes predefined files with recommended procedures for measurements and validation. They are read-only document files and destined as fully defined but unmeasured masks. All test positions (head or body-worn) are tested with the same configuration of test steps differing only in the grid definition for the different test positions.

The “reference” and “drift” measurements are located at the beginning and end of the batch process. They measure the field drift at one single point in the liquid over the complete procedure. The indicated drift is mainly the variation of the DUT’s output power and should vary max. ± 5 %.

The “surface check” measurement tests the optical surface detection system of the DASY5 system by repeatedly detecting the surface with the optical and mechanical surface detector and comparing the results. The output gives the detecting heights of both systems, the difference between the two systems and the standard deviation of the detection repeatability. Air bubbles or refraction in the liquid due to separation of the sugar-water mixture gives poor repeatability (above ± 0.1mm). To prevent wrong results tests are only executed when the liquid is free of air bubbles. The difference between the optical surface detection and the actual surface depends on the probe and is specified with each probe. (It does not depend on the surface reflectivity or the probe angle to the surface within ± 30°.)

- Area Scan

The “area scan” measures the SAR above the DUT or verification dipole on a parallel plane to the surface. It is used to locate the approximate location of the peak SAR with 2D spline interpolation. The robot performs a stepped movement along one grid axis while the local electrical field strength is measured by the probe. The probe is touching the surface of the SAM during acquisition of measurement values. The standard scan uses large grid spacing for faster measurement. Standard grid spacing for head measurements is 15 mm in x- and y- dimension (≤2GHz), 12 mm inx- and y- dimension (2-4 GHz) and 10mm in x- and y- dimension (4-6GHz). If a finer resolution is needed, the grid spacing can be reduced. Grid spacing and orientation have no influence on the SAR result. For special applications where the standard scan method does not find the peak SAR within the grid, e.g. mobile phones with flip cover, the grid can be adapted in orientation.

- Zoom Scan

A “zoom scan” measures the field in a volume around the 2D peak SAR value acquired in the previous “coarse” scan. This is a fine grid with maximum scan spatial resolution: Δx_{zoom}, Δy_{zoom}≤2GHz -≤8mm, 2-4GHz -≤5 mm and 4-6 GHz-≤4mm; Δz_{zoom}≤3GHz -≤5 mm, 3-4 GHz-≤4mm and 4-6GHz-≤2mm where the robot additionally moves the probe along the z-axis away from the bottom of the Phantom. DASY is also able to perform repeated zoom scans if more than 1 peak is found during area scan. In this document, the evaluated peak 1g and 10g averaged SAR values are shown in the 2D-graphics in Appendix B. Test results relevant for the specified standard (see chapter 1.4.) are shown in table form in chapter 7.2.

A Z-axis scan measures the total SAR value at the x-and y-position of the maximum SAR value found during the cube scan. The probe is moved away in z-direction from the bottom of the SAM phantom in 2 mm steps. This measurement shows the continuity of the liquid and can - depending in the field strength - also show the liquid depth.

The following table summarizes the area scan and zoom scan resolutions per FCC KDB 865664D01:

Frequency	Maximun Area Scan resolution (Δx_{area}, Δy_{area})	Maximun Zoom Scan spatial resolution (Δx_{Zoom}, Δy_{Zoom})	Maximun Zoom Scan spatial resolution			Minimum zoom scan volume (x,y,z)
			Uniform Grid	Graded Grad		
			$\Delta z_{Zoom}(n)$	$\Delta z_{Zoom}(1)$*	$\Delta z_{Zoom}(n>1)$*	
≤2GHz	≤15mm	≤8mm	≤5mm	≤4mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥30mm
2-3GHz	≤12mm	≤5mm	≤5mm	≤4mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥30mm
3-4GHz	≤12mm	≤5mm	≤4mm	≤3mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥28mm
4-5GHz	≤10mm	≤4mm	≤3mm	≤2.5mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥25mm
5-6GHz	≤10mm	≤4mm	≤2mm	≤2mm	≤1.5*$\Delta z_{Zoom}(n-1)$	≥22mm

3.2.5 SPATIAL PEAK SAR EVALUATION

The spatial peak SAR - value for 1 and 10 g is evaluated after the Cube measurements have been done. The basis of the evaluation are the SAR values measured at the points of the fine cube grid consisting of 5 x 5 x 7 points (with 8mm horizontal resolution) or 7 x 7 x 7 points (with 5mm horizontal resolution) or 8 x 8 x 7 points (with 4mm horizontal resolution). The algorithm that finds the maximal averaged volume is separated into three different stages.

- The data between the dipole center of the probe and the surface of the phantom are extrapolated. This data cannot be measured since the center of the dipole is 2.7 mm away from the tip of the probe and the distance between the surface and the lowest measuring point is about 1 mm (see probe calibration sheet). The extrapolated data from a cube measurement can be visualized by selecting “Graph Evaluated”.
- The maximum interpolated value is searched with a straight-forward algorithm. Around this maximum the SAR - values averaged over the spatial volumes (1g or 10 g) are computed using the 3d-spline interpolation algorithm. If the volume cannot be evaluated (i.e., if a part of the grid was cut off by the boundary of the measurement area) the evaluation will be started on the corners of the bottom plane of the cube.
- All neighboring volumes are evaluated until no neighboring volume with a higher average value is found.

Extrapolation

The extrapolation is based on a least square algorithm [W. Gander, Computer mathematic, p.168-180]. Through the points in the first 3 cm along the z-axis, polynomials of order four are calculated. These polynomials are then used to evaluate the points between the surface and the probe tip. The points, calculated from the surface, have a distance of 1 mm from each other.

Interpolation

The interpolation of the points is done with a 3d-Spline. The 3d-Spline is composed of three one-dimensional splines with the "Not a knot"-condition [W. Gander, Computer mathematic, p.141-150] (x, y and z -direction) [Numerical Recipes in C, Second Edition, p.123ff].

Volume Averaging

At First the size of the cube is calculated. Then the volume is integrated with the trapezoidal algorithm. 8000 points (20x20x20) are interpolated to calculate the average.

Advanced Extrapolation

DASY5 uses the advanced extrapolation option which is able to compensate boundary effects on E-field probes.

3.2.6 DATA STORAGE AND EVALUATION

3.2.6.1 Data Storage

The DASY5 software stores the acquired data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all necessary software parameters for the data evaluation (probe calibration data, liquid parameters and device frequency and modulation data) in measurement files with the extension “DAE”. The software evaluates the desired unit and format for output each time the data is visualized or exported. This allows verification of the complete software setup even after the measurement and allows correction of incorrect parameter settings. For example, if a measurement has been performed with a wrong crest factor parameter in the device setup, the parameter can be corrected afterwards and the data can be re-evaluated.

The measured data can be visualized or exported in different units or formats, depending on the selected probe type ([V/m], [A/m], [°C], [mW/g], [mW/cm^2], [dBrel], etc.). Some of these units are not available in certain situations or show meaningless results, e.g., a SAR output in a lossless media will always be zero. Raw data can also be exported to perform the evaluation with other software packages.

3.2.7 DATA EVALUATION BY SEMCAD

The SEMCAD software automatically executes the following procedures to calculate the field units from the microvolt readings at the probe connector. The parameters used in the evaluation are stored in the configuration modules of the software:

Probe parameters:	Sensitivity	Normi, a_{i0}, a_{i1}, a_{i2}
	Conversion factor	$ConvF_i$
	Diode compression point	Dcp_i
Device parameters:	Frequency	f
	Crest factor	cf
Media parameters:	Conductivity	
	Density	

These parameters must be set correctly in the software. They can be found in the component documents or they can be imported into the software from the configuration files issued for the DASY5 components. In the direct measuring mode of the multimeter option, the parameters of the actual system setup are used. In the scan visualization and export modes, the parameters stored in the corresponding document files are used.

The first step of the evaluation is a linearization of the filtered input signal to account for the compression characteristics of the detector diode. The compensation depends on the input signal, the diode type and the DC-transmission factor from the diode to the evaluation electronics.

If the exciting field is pulsed, the crest factor of the signal must be known to correctly compensate for peak power. The formula for each channel can be given as:

$$V_i = U_i + U_i^2 \cdot cf / dcp_i$$

With	V_i= compensated signal of channel i	(i = x,y,z)
	U_i= input signal of channel i	(i = x, y,z)
	cf=crest factor of exciting field	(DASY parameter)
	dcp_i=diode compression point	(DASY parameter)

From the compensated input signals the primary field data for each channel can be evaluated:

E-field probes: $E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$

H-field probes: $H_i = (V_i)^{1/2} \cdot (a_{i0} + a_{i1}f + a_{i2}f^2) / f$

With V_i= compensated signal of channel i (i = x,y,z)

$Norm_i$= sensor sensitivity of channel i (i = x, y,z)

[$mV/(V/m)^2$]for E-field Probes

ConvF = sensitivity enhancement in solution

aij=sensor sensitivity factors for H-field probes

f=carrier frequency [GHz]

E_i=electric field strength of channel i in V/m

H_i= magnetic field strength of channel i in A/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$E_{tot} = (E_X^2 + E_Y^2 + E_Z^2)^{1/2}$$

The primary field data are used to calculate the derived field units.

$$SAR = (E_{tot})^2 \cdot \sigma / (\rho \cdot 1000)$$

With SAR=local specific absorption rate in mW/g

E_{tot}=total field strength in V/m

=conductivity in[mho/m]or[Siemens/m]

=equivalent tissue density in g/cm^3

Note that the density is normally set to 1(or1.06), to account for actual brain density rather than the density of the simulation liquid. The power flow density is calculated assuming the excitation field to be a free space field.

$$P_{pwe} = E_{tot}^2 / 3770 \text{ or } P_{pwe} = H_{tot}^2 \cdot 37.7$$

With P_{pwe}= equivalent power density of a plane wave in mW/cm^2

E_{tot}=total field strength in V/m

H_{tot}=total magnetic field strength in A/m

4. SYSTEM VERIFICATION PROCEDURE

4.1 TISSUE VERIFICATION

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine of the dielectic parameter are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within ± 5% of the target values.
The following materials are used for producing the tissue-equivalent materials.

Tissue Type	Bactericide	DGBE	HEC	NaCl	Sucrose	Triton X-100	Water	Diethylene Glycol Mono-hexylether
Head 2450	-	45.0	-	0.1	-	-	54.9	-

Salt: 99+% Pure Sodium Chloride; Sugar: 98+% Pure Sucrose; Water: De-ionized, 16M + resistivity
HEC: Hydroxyethyl Cellulose; DGBE: 99+% Di(ethylene glycol) butyl ether,[2-(2-butoxyethoxy)ethanol]
Triton X-100(ultra pure): Polyethylene glycol mono [4-(1,1,3,3-tetramethylbutyl)phenyl]ether

Tissue Verification									
Tissue Type	Frequency (MHz)	Liquid Temp. (℃)	Conductivity (σ)	Permittivity (εr)	Targeted Conductivity (σ)	Targeted Permittivity (εr)	Deviation Conductivity (σ) (%)	Deviation Permittivity (εr) (%)	Date
Head	2450	22.5	1.793	39.738	1.79	39.2	0.00	1.37	May 27, 2022

Note:
1)The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.
2)KDB 865664 was ensured to be applied for probe calibration frequencies greater than or equal to 50MHz of the EUT frequencies.
3)The above measured tissue parameters were used in the DASY software to perform interpolation via the DASY software to determine actual dielectric parameters at the test frequencies. The SAR test plots may slightly differ from the table above since the DASY rounds to three significant digits.

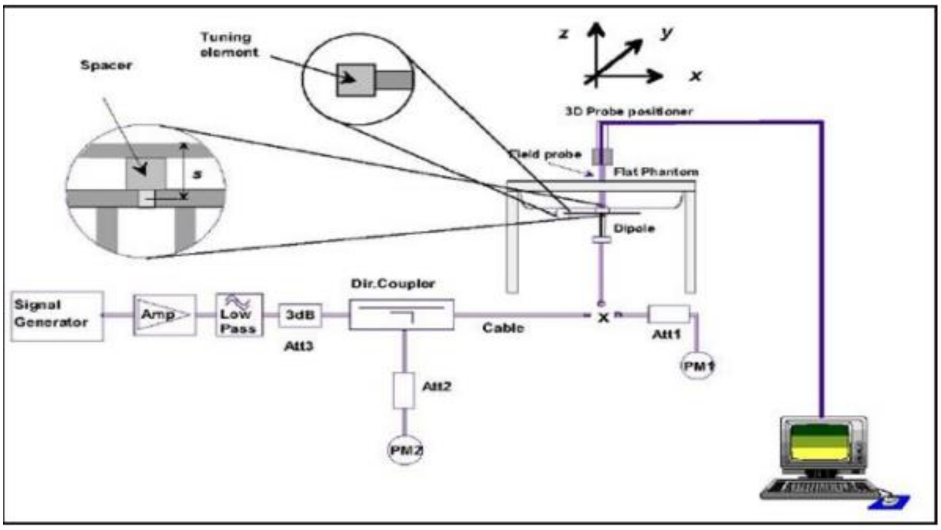
4.2 SYSTEM CHECK

The system check is performed for verifying the accuracy of the complete measurement system and performance of the software. The system check is performed with tissue equivalent material according to IEE Std 1528 (described above). The following table shows system check results for all frequency bands and tissue liquids used during the tests.

System Check	Date	Frequency (MHz)	Targeted SAR 1g (W/kg)	Measured SAR 1g (W/kg)	normalized SAR 1g (W/kg)	Deviation 1g (%)	Dipole S/N
Head	May 27, 2022	2450	52.10	12.70	50.80	-2.50	919

4.3 SYSTEM CHECK PROCEDURE

The system check is performed by using a system check dipole which is positioned parallel to the planar part of the SAM phantom at the reference point. The distance of the dipole to the SAM phantom is determined by a plexiglass spacer. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 250mW (below 3GHz) or 100mW (3-6GHz). To adjust this power a power meter is used.
The power sensor is connected to the cable before the system check to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system check to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test. System check results have to be equal or near the values determined during dipole calibration (target SAR in table above) with the relevant liquids and test system (±10 %).



5. SAR MEASUREMENT VARIABILITY AND UNCERTAINTY

5.1 SAR MEASUREMENT VARIABILITY

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20.

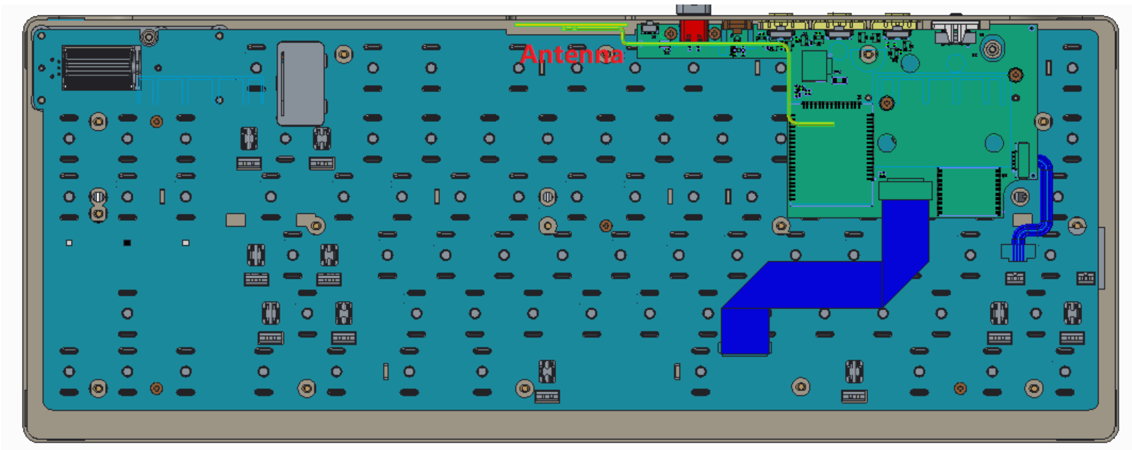
The same procedures should be adapted for measurements according to extremity and occupational exposure limits by applying a factor of 2.5 for extremity exposure and a factor of 5 for occupational exposure to the corresponding SAR thresholds.

The detailed repeated measurement results are shown in Section 7.2.

6. OPERATIONAL CONDITIONS DURING TEST

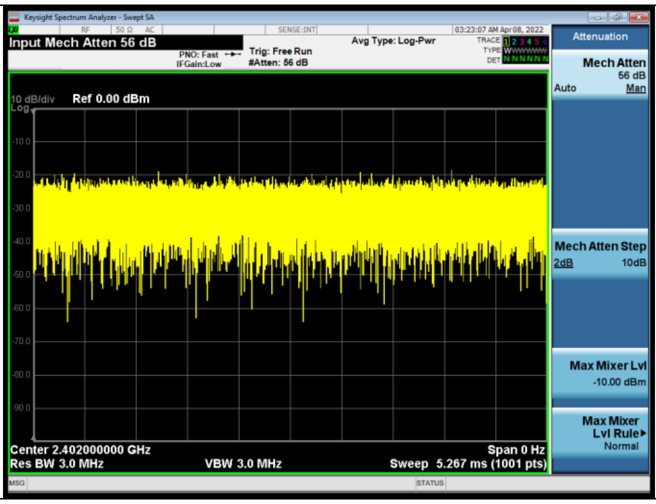
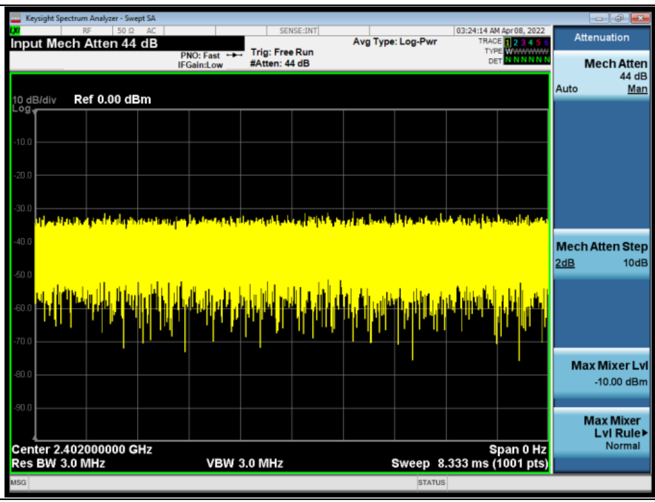
6.1 TEST POSITION

Only tests Front Face, Rear Face and Top Side. The location of the antenna inside EUT is as below.



6.2 TEST CONFIGURATION

For 2.4G SRD / BLE SAR testing, 2.4G SRD / BLE engineering testing software installed on the DUT can provide continuous transmitting RF signal.

Duty Cycle	Duty Cycle
2.4G SRD	BLE
100%	100%
	

7. TEST RESULT

7.1 CONDUCTED POWER RESULTS

7.1.1 CONDUCTED POWER MEASUREMENTS OF 2.4G SRD

Mode	Channel	Frequency (MHz)	Data Rate (Mbps)	Max. Tune up	Average Power(dBm)
2.4G SRD	0	2402	2	4.00	**3.09**
	39	2441		4.00	**2.74**
	78	2480		4.00	**3.22**

Note:
1) The Average conducted power of 2.4G SRD is measured with RMS detector.
2) The tested channel results are marks in bold.
3) Stand-alone SAR
According to the output power measurement result we can draw the conclusion that:
Stand-alone SAR are required for 2.4G SRD, because the output power
(EIRP Power=4.00+3.58=7.58dBm) of 2.4G SRD transmitter is ≥ (P_{max}=4.77dBm).

7.1.2 CONDUCTED POWER MEASUREMENTS OF BT

BT	Average Conducted Power(dBm)			
	Max. Tune up	CH0 2402MHz	CH19 2441MHz	CH39 2480MHz
BLE(1M)	4.00	3.13	2.77	3.25
BLE(2M)	4.00	**3.14**	**2.78**	**3.27**

Note:
1) The Average conducted power of BLE is measured with RMS detector.
2) The tested channel results are marks in bold.
3) Stand-alone SAR
According to the output power measurement result we can draw the conclusion that:
Stand-alone SAR are required for BLE, because the output power
(EIRP Power=4.00+3.58=7.58dBm) of BLE transmitter is ≥ (P_{max}=4.77dBm).

7.2 SAR TEST RESULTS

General Notes:
1) Per KDB447498 D04, all measurement SAR results are scaled to the maximum tune-up tolerance limit to demonstrate compliant.
2) Per KDB447498 D04, 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: ≤ 0.8W/kg or 2.0W/kg, for 1-g or 10-g respectively, when the transmission band is ≤ 100MHz. When the maximum output power variation across the required test channels is > ½ dB, instead of the middle channel, the highest output power channel must be used.
3) Per KDB865664 D01, for each frequency band, repeated SAR measurement is required only when the measured SAR is ≥ 0.8W/kg; if the deviation among the repeated measurement is ≤ 20%, and the measured SAR < 1.45W/kg, only one repeated measurement is required.

7.2.1 SAR MEASUREMENT RESULT

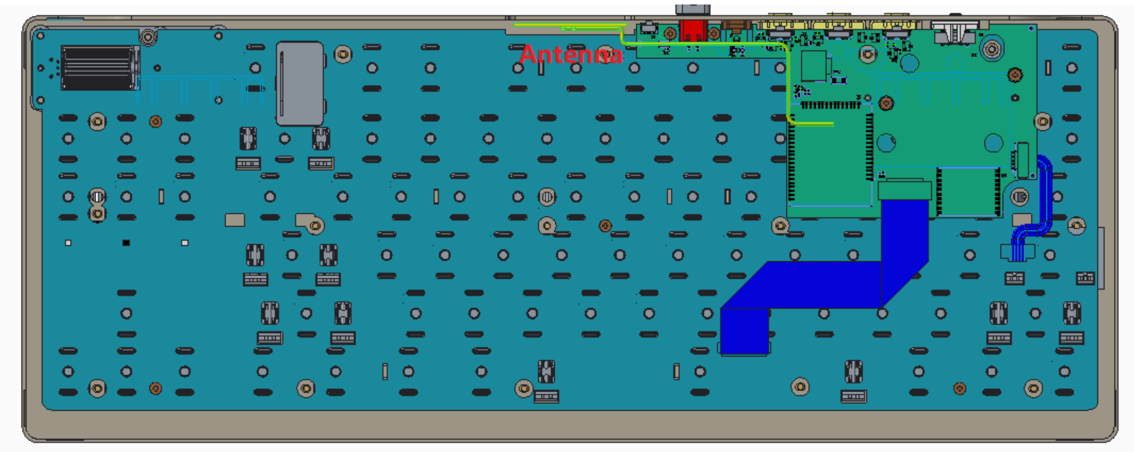
Test No.	Band	Channel	Test Position	Separation Distance (cm)	Data Rate	Maximum Tune-up (dBm)	Conducted Power (dBm)	Power Drift (dB)	SAR 1g (W/kg)	SAR 10g (W/kg)	Reported 1g SAR
B01	2.4G SRD	0	Front Face	0	2	4	3.09	0.05	<0.001	<0.001	<0.001
B02	2.4G SRD	0	Rear Face	0	2	4	3.09	0.02	<0.001	<0.001	<0.001
B03	2.4G SRD	0	Top Side	0	2	4	3.09	-0.04	0.058	0.016	0.071
B04	2.4G SRD	39	Top Side	0	2	4	2.74	-0.09	**0.061**	**0.017**	**0.081**
B05	2.4G SRD	78	Top Side	0	2	4	3.22	0.04	0.051	0.014	0.061
B07	BLE	0	Front Face	0	2	4	3.27	0.02	<0.001	<0.001	<0.001
B08	BLE	0	Rear Face	0	2	4	3.27	0.06	<0.001	<0.001	<0.001
B09	BLE	0	Top Side	0	2	4	3.27	0.07	0.043	0.010	0.051
B10	BLE	19	Top Side	0	2	4	2.78	0.02	0.036	0.008	0.048
B11	BLE	39	Top Side	0	2	4	3.27	0.08	**0.094**	**0.028**	**0.111**

Note: The value with boldface is the maximum SAR Value of each test band.

8 MULTIPLE TRANSMITTER EVALUATION

The following tables list information which is relevant for the decision if a simultaneous transmit evaluation is necessary according to FCC KDB 447498 D04 Interim General RF Exposure Guidance v01.

The location of the antennas inside the EUT is shown as below picture:

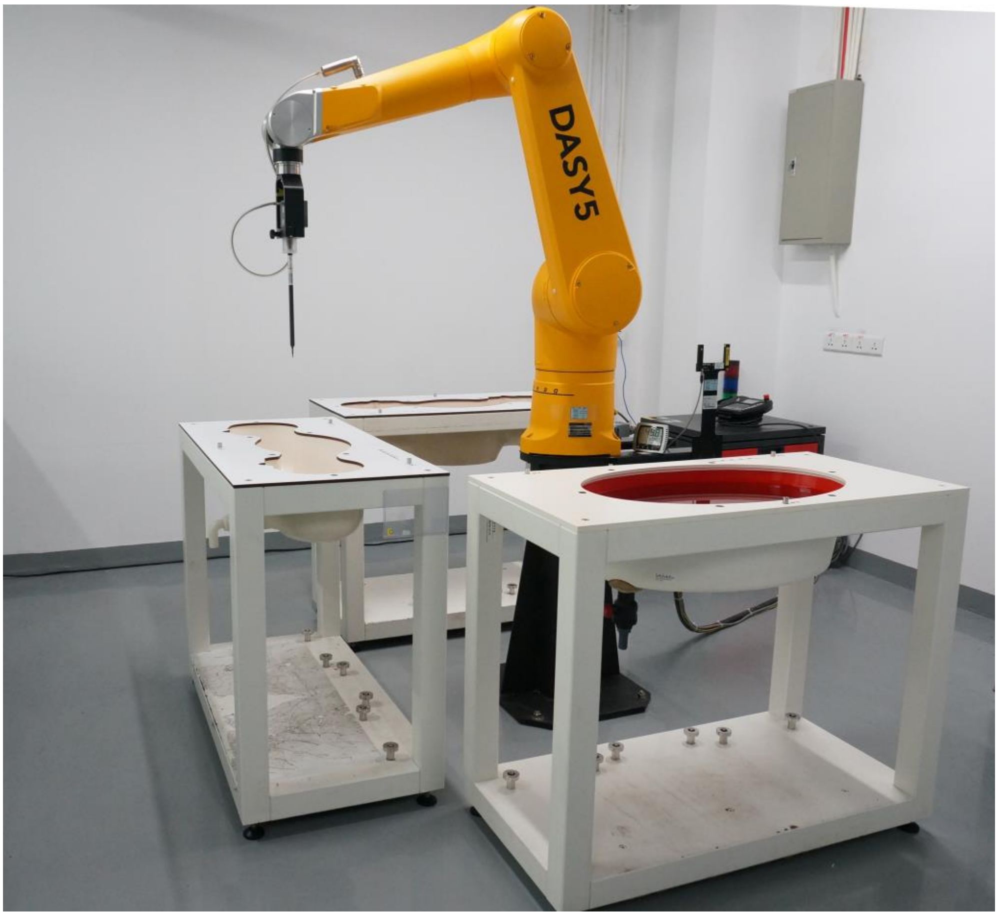


Note: The EUT only has one antenna and does not have synchronous transmission function.

APPENDIX

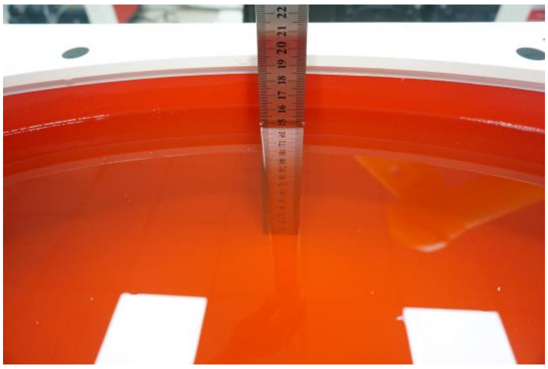
1. TEST LAYOUT

Specific Absorption Rate Test Layout



Liquid depth in the flat Phantom (≥15cm depth)

HSL_2300-2700MHz_15.1cm



Appendix A. SAR Plots of System Verification

(Pls See BTL-FCC SAR-1-2204E024A_Appendix A.)

Appendix B. SAR Plots of SAR Measurement

(Pls See BTL-FCC SAR-1-2204E024A_Appendix B.)

Appendix C. Calibration Certificate

(Pls See BTL-FCC SAR-1-2204E024A_Appendix C.)

Appendix D. Photographs of the Test Set-Up

(Pls See BTL-FCC SAR-1-2204E024A_Appendix D.)

End of Test Report