



# FCC SAR Test Report

**APPLICANT** : Realtek Semiconductor Corp.  
**EQUIPMENT** : 802.11 b/g/n BT RTL8723BE Combo module  
**BRAND NAME** : REALTEK  
**MODEL NAME** : RTL8723BE  
**FCC ID** : TX2-RTL8723BE  
**STANDARD** : FCC 47 CFR Part 2 (2.1093)  
ANSI/IEEE C95.1-1992  
IEEE 1528-2003

The product was installed into Portable Computer (Brand Name: DELL, Model Name: P57G, Regulatory Type: P57G002) during test.

We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample has been evaluated in accordance with the procedures and had been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC., the test report shall not be reproduced except in full.

Reviewed by: Eric Huang / Deputy Manager

Approved by: Jones Tsai / Manager



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## Revision History



## 1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Realtek Semiconductor Corp., 802.11 b/g/n BT RTL8723BE Combo module, RTL8723BE**, are as follows.

Equipment Class	Frequency Band	Highest SAR Summary	
		Body 1g SAR (W/kg)	Simultaneous Transmission 1g SAR (W/kg)
DTS	2.4GHz WLAN	0.70	0.79
DSS	Bluetooth	0.09	
Date of Testing:		2015/06/02 ~ 2015/06/08	

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR part 2 (2.1093) and ANSI/IEEE C95.1-1992, and had been tested in accordance with the measurement methods and procedures specified in IEEE 1528-2003.

## 2. Administration Data

Testing Laboratory	
Test Site	SPORTON INTERNATIONAL INC.
Test Site Location	No.52, Hwa Ya 1st Rd., Hwa Ya Technology Park, Kwei-Shan District, Taoyuan City, Taiwan (R.O.C.) TEL: +886-3-327-3456 FAX: +886-3-328-4978

Applicant	
Company Name	Realtek Semiconductor Corp.
Address	No. 2, Innovation Road II, Hsinchu Science Park, Hsinchu 300, Taiwan

Manufacturer	
Company Name	Realtek Semiconductor Corp.
Address	No. 2, Innovation Road II, Hsinchu Science Park, Hsinchu 300, Taiwan

## 3. Guidance Standard

The Specific Absorption Rate (SAR) testing specification, method, and procedure for this device is in accordance with the following standards:

- FCC 47 CFR Part 2 (2.1093)
- ANSI/IEEE C95.1-1992
- IEEE 1528-2003
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r03
- FCC KDB 865664 D02 SAR Reporting v01r01
- FCC KDB 447498 D01 General RF Exposure Guidance v05r02
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r01
- FCC KDB 616217 D04 SAR for laptop and tablets v01r01



## 4. Equipment Under Test (EUT)

### 4.1 General Information

Product Feature & Specification	
Equipment Name	802.11 b/g/n BT RTL8723BE Combo module
Brand Name	REALTEK
Model Name	RTL8723BE
FCC ID	TX2-RTL8723BE
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	· 802.11b/g/n HT20/HT40 · Bluetooth v2.1+EDR · Bluetooth v4.0-LE
EUT Stage	Identical Prototype
Remark:	
1.	This host, the display screen can be rotated 360 degree and lay down on the back surface become a Tablet computer, RF Exposure evaluation was performed on the two configuration of Tablet mode and NB mode.
2.	Two kinds antenna will integrated into this host, the RF exposure evaluation is selected highest gain at the "main antenna" of WNC as the main test and Acon will verify worse case found in WNC tested results.
3.	For tablet SAR evaluation, first test at the main antenna, then repeat testing at the Aux antenna. Considering the antenna gain of main WNC antenna is higher gain than the main Acon antenna in tablet mode, the main WNC antenna configuration is so selected as the main test configuration. The Acon antenna is also verified on the worst SAR configuration found in WNC antenna testing.

Host Feature & Antenna Information					
Host	Portable Computer				
Brand Name	DELL				
Model Name	P57G				
Regulatory Type	P57G002				
Antenna Type	PIFA Antenna				
WNC Main	Manufacture	Wistron Neweb Corporation	WNC Aux	Manufacture	Wistron Neweb Corporation
	Model No.	81EAAX15.G25		Model No.	81EAAX15.G25
	Peak Gain:			Peak Gain:	
	NB Mode: 2.4GHz: 2.93 (dBi)	Tablet Mode: 2.4GHz: 2.97 (dBi)		NB Mode: 2.4GHz: 0.04 (dBi)	Tablet Mode: 2.4GHz: -0.27 (dBi)
Acon Main	Manufacture	ACON	Acon Aux	Manufacture	ACON
	Model No.	APP6Y-700119		Model No.	APP6Y-700119
	Peak Gain:			Peak Gain:	
	NB Mode: 2.4GHz: 1.81 (dBi)	Tablet Mode: 2.4GHz: 0.06 (dBi)		NB Mode: 2.4GHz: 0.02 (dBi)	Tablet Mode: 2.4GHz: -2.36 (dBi)

### 4.2 Maximum Tune-up Limit

Mode		Average Power (dBm)	
Bluetooth v2.1+EDR	1Mbps	8	
	2Mbps	8	
	3Mbps	8	
Bluetooth v4.0-LE			8

Band / Frequency (MHz)		IEEE 802.11 Average Power (dBm)							
		WLAN Antenna 0				WLAN Antenna 1			
		11b	11g	HT20	HT40	11b	11g	HT20	HT40
2.4GHz Band	2412	17	16	14	14	17	16	14	14
	2422				14				14
	2437	17	16	16	16	17	16	16.5	16.5
	2452				14				14
	2462	17	16	14	14	17	16	14	14



## 5. RF Exposure Limits

### 5.1 Uncontrolled Environment

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

### 5.2 Controlled Environment

Controlled Environments are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. The exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

#### Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

#### Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

1. Whole-Body SAR is averaged over the entire body, partial-body SAR is averaged over any 1gram of tissue defined as a tissue volume in the shape of a cube. SAR for hands, wrists, feet and ankles is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.



## 6. Specific Absorption Rate (SAR)

### 6.1 Introduction

SAR is related to the rate at which energy is absorbed per unit mass in an object exposed to a radio field. The SAR distribution in a biological body is complicated and is usually carried out by experimental techniques or numerical modeling. The standard recommends limits for two tiers of groups, occupational/controlled and general population/uncontrolled, based on a person's awareness and ability to exercise control over his or her exposure. In general, occupational/controlled exposure limits are higher than the limits for general population/uncontrolled.

### 6.2 SAR Definition

The SAR definition is the time derivative (rate) of the incremental energy (dW) absorbed by (dissipated in) an incremental mass (dm) contained in a volume element (dv) of a given density (ρ). The equation description is as below:

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

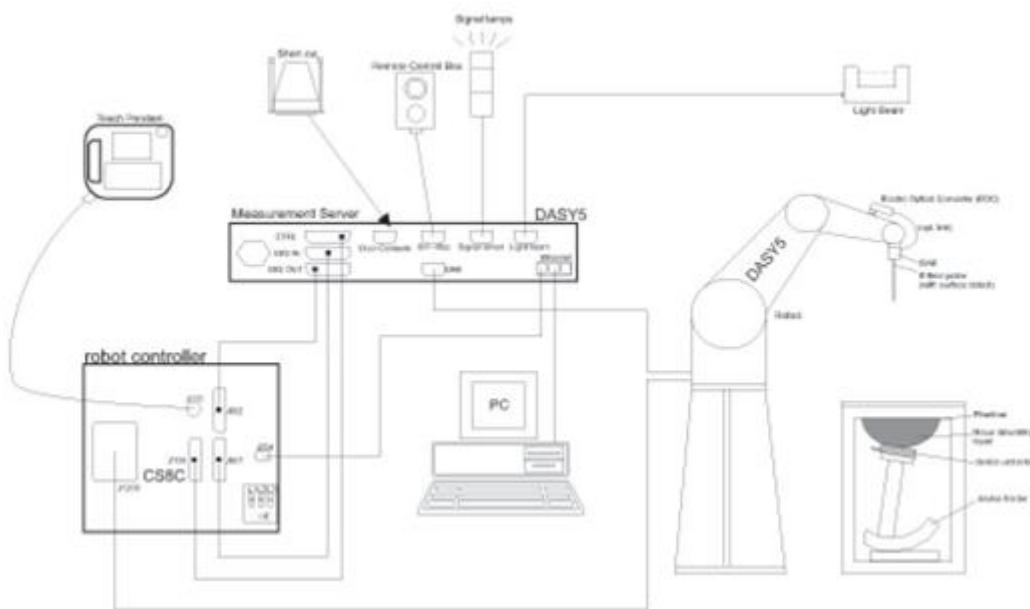
SAR is expressed in units of Watts per kilogram (W/kg)

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

Where: σ is the conductivity of the tissue, ρ is the mass density of the tissue and E is the RMS electrical field strength.

## **7. System Description and Setup**

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



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



## 8. Measurement Procedures

The measurement procedures are as follows:

### <Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/BT power measurement, use engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power in each supported wireless interface and frequency band
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/BT output power

### <SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/BT continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix D demonstrates.
- (c) Set scan area, grid size and other setting on the DASY software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

### 8.1 Spatial Peak SAR Evaluation

The procedure for spatial peak SAR evaluation has been implemented according to the test standard. It can be conducted for 1g and 10g, as well as for user-specific masses. The DASY software includes all numerical procedures necessary to evaluate the spatial peak SAR value.

The base for the evaluation is a "cube" measurement. The measured volume must include the 1g and 10g cubes with the highest averaged SAR values. For that purpose, the center of the measured volume is aligned to the interpolated peak SAR value of a previously performed area scan.

The entire evaluation of the spatial peak values is performed within the post-processing engine (SEMCAD). The system always gives the maximum values for the 1g and 10g cubes. The algorithm to find the cube with highest averaged SAR is divided into the following stages:

- (a) Extraction of the measured data (grid and values) from the Zoom Scan
- (b) Calculation of the SAR value at every measurement point based on all stored data (A/D values and measurement parameters)
- (c) Generation of a high-resolution mesh within the measured volume
- (d) Interpolation of all measured values from the measurement grid to the high-resolution grid
- (e) Extrapolation of the entire 3-D field distribution to the phantom surface over the distance from sensor to surface
- (f) Calculation of the averaged SAR within masses of 1g and 10g



## 8.2 Power Reference Measurement

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

## 8.3 Area Scan

The area scan is used as a fast scan in two dimensions to find the area of high field values, before doing a fine measurement around the hot spot. The sophisticated interpolation routines implemented in DASY software can find the maximum found in the scanned area, within a range of the global maximum. The range (in dB0) is specified in the standards for compliance testing. For example, a 2 dB range is required in IEEE standard 1528 and IEC 62209 standards, whereby 3 dB is a requirement when compliance is assessed in accordance with the ARIB standard (Japan), if only one zoom scan follows the area scan, then only the absolute maximum will be taken as reference. For cases where multiple maximums are detected, the number of zoom scans has to be increased accordingly.

Area scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

	$\leq 3$ GHz	$> 3$ GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	$5 \pm 1$ mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
	$\leq 2$ GHz: $\leq 15$ mm $2 - 3$ GHz: $\leq 12$ mm	$3 - 4$ GHz: $\leq 12$ mm $4 - 6$ GHz: $\leq 10$ mm
Maximum area scan spatial resolution: $\Delta x_{\text{Area}}$ , $\Delta y_{\text{Area}}$	When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be $\leq$ the corresponding x or y dimension of the test device with at least one measurement point on the test device.	



## 8.4 Zoom Scan

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

Zoom scan parameters extracted from FCC KDB 865664 D01v01r03 SAR measurement 100 MHz to 6 GHz.

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

Note:  $\delta$  is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

\* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is  $\leq 1.4$  W/kg,  $\leq 8$  mm,  $\leq 7$  mm and  $\leq 5$  mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

## 8.5 Volume Scan Procedures

The volume scan is used to assess overlapping SAR distributions for antennas transmitting in different frequency bands. It is equivalent to an oversized zoom scan used in standalone measurements. The measurement volume will be used to enclose all the simultaneous transmitting antennas. For antennas transmitting simultaneously in different frequency bands, the volume scan is measured separately in each frequency band. In order to sum correctly to compute the 1g aggregate SAR, the EUT remains in the same test position for all measurements and all volume scan use the same spatial resolution and grid spacing. When all volume scan were completed, the software, SEMCAD postprocessor can combine and subsequently superpose these measurement data to calculating the multiband SAR.

## 8.6 Power Drift Monitoring

All SAR testing is under the EUT install full charged battery and transmit maximum output power. In DASY measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in dB. If the power drifts more than 5%, the SAR will be retested.



## 9. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	924	Nov. 19, 2014	Nov. 18, 2015
SPEAG	Data Acquisition Electronics	DAE3	577	Oct. 06, 2014	Oct. 05, 2015
SPEAG	Data Acquisition Electronics	DAE4	1399	Nov. 13, 2014	Nov. 12, 2015
SPEAG	Dosimetric E-Field Probe	EX3DV4	3931	Sep. 25, 2014	Sep. 24, 2015
SPEAG	Dosimetric E-Field Probe	EX3DV4	3955	Nov. 21, 2014	Nov. 20, 2015
H.M.IRIS	Thermometer	TH-08	TM658	Oct. 21, 2014	Oct. 20, 2015
Wisewind	Thermometer	ETP-101	TM225	Oct. 21, 2014	Oct. 20, 2015
Anritsu	BT Base Station	MT8852B	1350002	Dec. 12, 2014	Dec. 11, 2015
SPEAG	Device Holder	N/A	N/A	N/A	N/A
Agilent	Signal Generator	N5181A	MY50145381	Dec. 11, 2014	Dec. 10, 2015
Agilent	ENA Network Analyzer	E5071C	MY46316648	Feb. 11, 2015	Feb. 10, 2016
SPEAG	Dielectric Probe Kit	DAK-3.5	1138	Nov. 18, 2014	Nov. 17, 2015
Anritsu	Power Meter	ML2495A	1349001	Dec. 03, 2014	Dec. 02, 2015
Anritsu	Power Sensor	MA2411B	1306099	Dec. 03, 2014	Dec. 02, 2015
R&S	Spectrum Analyzer	FSP 7	101131	Jul. 10, 2014	Jul. 09, 2015
Agilent	Dual Directional Coupler	778D	50422	Note 1	
Woken	Attenuator 1	WK0602-XX	N/A	Note 1	
PE	Attenuator 2	PE7005-10	N/A	Note 1	
PE	Attenuator 3	PE7005- 3	N/A	Note 1	
AR	Power Amplifier	5S1G4M2	0328767	Note 1	
Mini-Circuits	Power Amplifier	ZVE-3W	162601250	Note 1	

**General Note:**

1. Prior to system verification and validation, the path loss from the signal generator to the system check source and the power meter, which includes the amplifier, cable, attenuator and directional coupler, was measured by the network analyzer. The reading of the power meter was offset by the path loss difference between the path to the power meter and the path to the system check source to monitor the actual power level fed to the system check source.



## 10. System Verification

### 10.1 Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Frequency (MHz)	Water (%)	Sugar (%)	Cellulose (%)	Salt (%)	Preventol (%)	DGBE (%)	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )
For Head								
750	41.1	57.0	0.2	1.4	0.2	0	0.89	41.9
835	40.3	57.9	0.2	1.4	0.2	0	0.90	41.5
900	40.3	57.9	0.2	1.4	0.2	0	0.97	41.5
1800, 1900, 2000	55.2	0	0	0.3	0	44.5	1.40	40.0
2450	55.0	0	0	0	0	45.0	1.80	39.2
2600	54.8	0	0	0.1	0	45.1	1.96	39.0
For Body								
750	51.7	47.2	0	0.9	0.1	0	0.96	55.5
835	50.8	48.2	0	0.9	0.1	0	0.97	55.2
900	50.8	48.2	0	0.9	0.1	0	1.05	55.0
1800, 1900, 2000	70.2	0	0	0.4	0	29.4	1.52	53.3
2450	68.6	0	0	0	0	31.4	1.95	52.7
2600	68.1	0	0	0.1	0	31.8	2.16	52.5

Simulating Liquid for 5GHz, Manufactured by SPEAG

Ingredients	(% by weight)
Water	64~78%
Mineral oil	11~18%
Emulsifiers	9~15%
Additives and Salt	2~3%

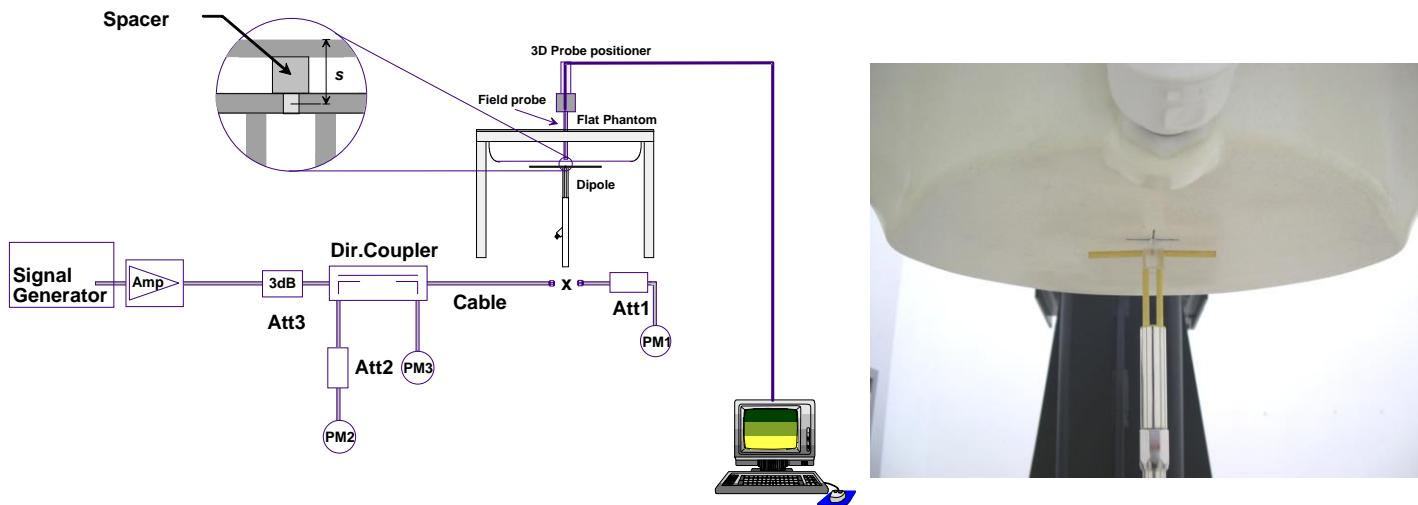
### < Tissue Dielectric Parameter Check Results >

Frequency (MHz)	Tissue Type	Liquid Temp. (°C)	Conductivity ( $\sigma$ )	Permittivity ( $\epsilon_r$ )	Conductivity Target ( $\sigma$ )	Permittivity Target ( $\epsilon_r$ )	Delta ( $\sigma$ ) (%)	Delta ( $\epsilon_r$ ) (%)	Limit (%)	Date
2450	MSL	22.7	2.009	53.697	1.95	52.70	3.03	1.89	$\pm 5$	2015/6/2
2450	MSL	22.5	1.948	52.198	1.95	52.70	-0.10	-0.95	$\pm 5$	2015/6/8

## 10.2 System Performance Check Results

Comparing to the original SAR value provided by SPEAG, the verification data should be within its specification of 10 %. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to Appendix A of this report.

Date	Frequency (MHz)	Tissue Type	Input Power (mW)	Dipole S/N	Probe S/N	DAE S/N	Measured 1g SAR (W/kg)	Targeted 1g SAR (W/kg)	Normalized 1g SAR (W/kg)	Deviation (%)
2015/6/2	2450	MSL	250	D2450V2-924	EX3DV4 - SN3955	DAE4 Sn1399	12.20	51.40	48.80	-5.06
2015/6/8	2450	MSL	250	D2450V2-924	EX3DV4 - SN3931	DAE3 Sn577	12.50	51.40	50.00	-2.72



**Fig 8.3.1 System Performance Check Setup**

**Fig 8.3.2 Setup Photo**

## 11. RF Exposure Positions

### 11.1 SAR Testing for Tablet

This device can be used also in full sized tablet exposure conditions, due to its size. Per FCC KDB 616217, the back surface and edges of the tablet should be tested for SAR compliance with the tablet touching the phantom. The SAR exclusion threshold in KDB 447498 D01v05r02 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent tablet edge is used to determine if SAR testing is required for the adjacent edges, with the adjacent edge positioned against the phantom and the edge containing the antenna positioned perpendicular to the phantom.



## **12. Conducted RF Output Power (Unit: dBm)**

### **<WLAN Conducted Power>**

#### **General Note:**

1. For WLAN SAR testing was performed on single antenna RF power in SISO mode is larger or equal to the single antenna RF power in MIMO mode, and for RF exposure assessment of MIMO mode simultaneous transmission exclusion analysis was performed with SAR test results of each antenna in SISO mode.
2. Per KDB 248227 D01v02r01, the simultaneous SAR provisions in KDB publication 447498 should be applied to determine simultaneous transmission SAR test exclusion for WiFi MIMO. If the sum of 1g single transmission chain SAR measurements is < 1.6W/kg and SAR peak to location ratio < 0.04, no additional SAR measurements for MIMO.
3. Per KDB 248227 D01v02r01, SAR test reduction is determined according to 802.11 transmission mode configurations and certain exposure conditions with multiple test positions. In the 2.4 GHz band, separate SAR procedures are applied to DSSS and OFDM configurations to simplify DSSS test requirements. For OFDM, in both 2.4 and 5 GHz bands, an initial test configuration must be determined for each standalone and aggregated frequency band, according to the transmission mode configuration with the highest maximum output power specified for production units to perform SAR measurements. If the same highest maximum output power applies to different combinations of channel bandwidths, modulations and data rates, additional procedures are applied to determine which test configurations require SAR measurement. When applicable, an initial test position may be applied to reduce the number of SAR measurements required for next to the ear, UMPC mini-tablet or hotspot mode configurations with multiple test positions.
4. For 2.4 GHz 802.11b DSSS, either the initial test position procedure for multiple exposure test positions or the DSSS procedure for fixed exposure position is applied; these are mutually exclusive. For 2.4 GHz and 5 GHz OFDM configurations, the initial test configuration is applied to measure SAR using either the initial test position procedure for multiple exposure test position configurations or the initial test configuration procedures for fixed exposure test conditions. Based on the reported SAR of the measured configurations and maximum output power of the transmission mode configurations that are not included in the initial test configuration, the subsequent test configuration and initial test position procedures are applied to determine if SAR measurements are required for the remaining OFDM transmission configurations. In general, the number of test channels that require SAR measurement is minimized based on maximum output power measured for the test sample(s).
5. For OFDM transmission configurations in the 2.4 GHz and 5 GHz bands, When the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel for each frequency band.
6. DSSS and OFDM configurations are considered separately according to the required SAR procedures. SAR is measured in the initial test position using the 802.11 transmission mode configuration required by the DSSS procedure or initial test configuration and subsequent test configuration(s) according to the OFDM procedures.<sup>18</sup> The initial test position procedure is described in the following:
  - a. When the reported SAR of the initial test position is  $\leq 0.4$  W/kg, further SAR measurement is not required for the other test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band.
  - b. When the reported SAR of the test position is  $> 0.4$  W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position to measure the subsequent next closest/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is  $\leq 0.8$  W/kg or all required test position are tested.
  - c. For all positions/configurations, when the reported SAR is  $> 0.8$  W/kg, SAR is measured for these test positions/configurations on the subsequent next highest measured output power channel(s) until the reported SAR is  $\leq 1.2$  W/kg or all required channels are tested.

<2.4GHz WLAN Antenna 0>

2.4GHz WLAN Antenna 0	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Duty Cycle %
	802.11b	CH 1	2412	1Mbps	16.36	100.00
		CH 6	2437		16.21	
		CH 11	2462		16.70	
	802.11g	CH 1	2412	6Mbps	14.03	100.00
		CH 6	2437		15.77	
		CH 11	2462		14.61	
	802.11n-HT20	CH 1	2412	MCS0	13.43	100.00
		CH 6	2437		15.75	
		CH 11	2462		13.45	
	802.11n-HT40	CH 3	2422	MCS0	13.40	100.00
		CH 6	2437		15.82	
		CH 9	2452		13.25	

<2.4GHz WLAN Antenna 1>

2.4GHz WLAN Antenna 1	Mode	Channel	Frequency (MHz)	Data Rate	Average power (dBm)	Duty Cycle %
	802.11b	CH 1	2412	1Mbps	16.35	100.00
		CH 6	2437		16.31	
		CH 11	2462		16.66	
	802.11g	CH 1	2412	6Mbps	14.21	100.00
		CH 6	2437		15.90	
		CH 11	2462		14.68	
	802.11n-HT20	CH 1	2412	MCS0	13.66	100.00
		CH 6	2437		15.80	
		CH 11	2462		13.41	
	802.11n-HT40	CH 3	2422	MCS0	13.40	100.00
		CH 6	2437		15.96	
		CH 9	2452		13.29	

<2.4GHz Bluetooth>**General Note:**

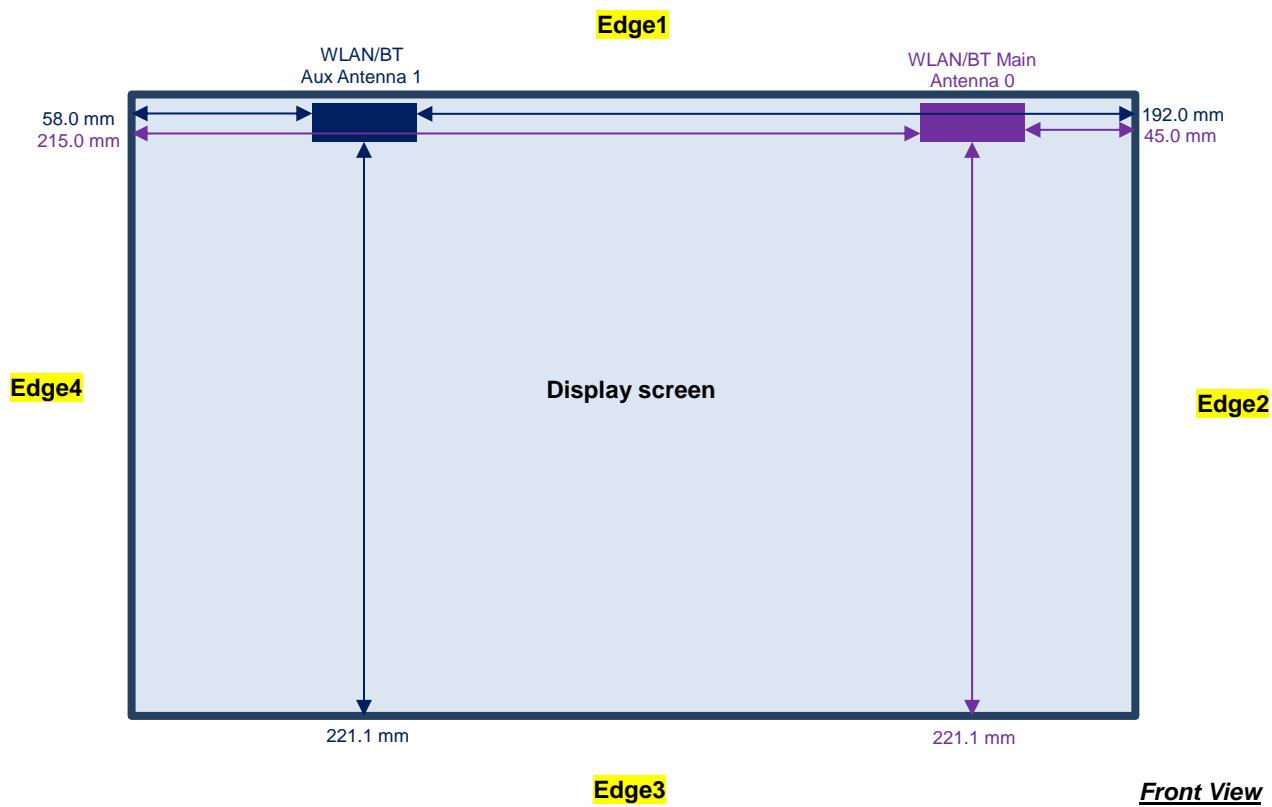
- For 2.4GHz Bluetooth SAR testing was selected 2Mbps, due to its highest average power.
- The duty factor is selected theoretical 83.3% perform Bluetooth SAR testing.

Mode	Channel	Frequency (MHz)	Average power (dBm)		
			1Mbps	2Mbps	3Mbps
v2.1 with EDR	CH 00	2402	5.21	7.85	7.83
	CH 39	2441	5.37	7.88	7.87
	CH 78	2480	5.10	7.57	7.54

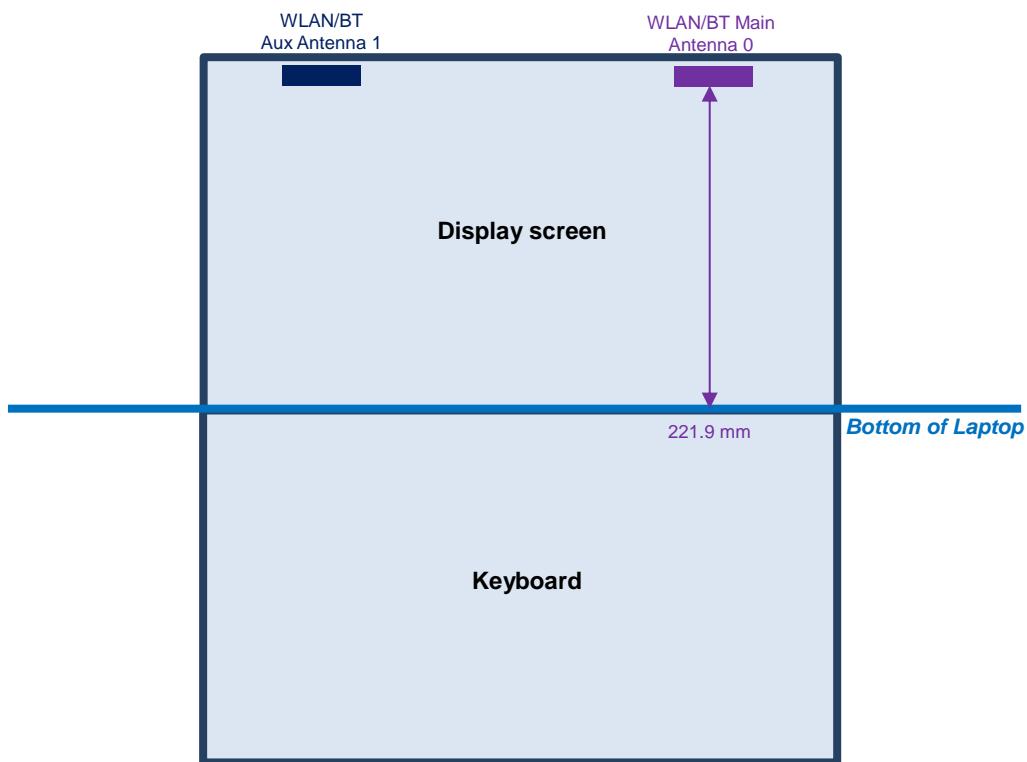
Mode	Channel	Frequency (MHz)	Average power (dBm)	
			GFSK	
v4.0 with LE	CH 00	2402	5.22	
	CH 19	2440	5.32	
	CH 39	2480	5.09	



### 13. Antenna Location



Front View



**<SAR test exclusion table>****General Note:**

1. The below table, when the distance is < 50 mm exclusion threshold is "Ratio", when the distance is > 50 mm exclusion threshold is "mW"
2. Maximum power is the source-based time-average power and represents the maximum RF output power among production units
3. Per KDB 447498 D01v05r02, for larger devices, the test separation distance of adjacent edge configuration is determined by the closest separation between the antenna and the user.
4. Per KDB 447498 D01v05r02, standalone SAR test exclusion threshold is applied; If the test separation distance is < 5mm, 5mm is used to determine SAR exclusion threshold.
5. Per KDB 447498 D01v05r02, the 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at *test separation distances* ≤ 50 mm are determined by:  

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$
 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR
  - $f(\text{GHz})$  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
6. Per KDB 447498 D01v05r02, at 100 MHz to 6 GHz and for *test separation distances* > 50 mm, the SAR test exclusion threshold is determined according to the following
  - a) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · (f(MHz)/150)] mW, at 100 MHz to 1500 MHz
  - b) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

Exposure Position	Wireless Interface	802.11b Ant 0	802.11b Ant 1
	Calculated Frequency	2462MHz	2462MHz
	Maximum power (dBm)	17	17
	Maximum rated power(mW)	50.0	50.0
Bottom Face	Separation distance(mm)	5.0	5.0
	exclusion threshold	15.7	15.7
	Testing required?	Yes	Yes
Edge 1	Separation distance(mm)	5.0	5.0
	exclusion threshold	15.7	15.7
	Testing required?	Yes	Yes
Edge 2	Separation distance(mm)	45.0	192.0
	exclusion threshold	1.7	1516.0
	Testing required?	No	No
Edge 3	Separation distance(mm)	221.1	221.1
	exclusion threshold	1807.0	1807.0
	Testing required?	No	No
Edge 4	Separation distance(mm)	215.0	58.0
	exclusion threshold	1746.0	176.0
	Testing required?	No	No
Bottom of Laptop	Separation distance(mm)	221.9	221.9
	exclusion threshold	1815.0	1815.0
	Testing required?	No	No



## 14. SAR Test Results

**General Note:**

1. Per KDB 447498 D01v05r02, the reported SAR is the measured SAR value adjusted for maximum tune-up tolerance.
  - a. Tune-up scaling Factor = tune-up limit power (mW) / EUT RF power (mW), where tune-up limit is the maximum rated power among all production units.
  - b. For Reported SAR(W/kg)= Measured SAR(W/kg) \* Tune-up scaling factor
2. Per KDB 447498 D01v05r02, for each exposure position, testing of other required channels within the operating mode of a frequency band is not required when the *reported* 1-g or 10-g SAR for the mid-band or highest output power channel is:
  - $\leq 0.8 \text{ W/kg}$  or  $2.0 \text{ W/kg}$ , for 1-g or 10-g respectively, when the transmission band is  $\leq 100 \text{ MHz}$
  - $\leq 0.6 \text{ W/kg}$  or  $1.5 \text{ W/kg}$ , for 1-g or 10-g respectively, when the transmission band is between  $100 \text{ MHz}$  and  $200 \text{ MHz}$
  - $\leq 0.4 \text{ W/kg}$  or  $1.0 \text{ W/kg}$ , for 1-g or 10-g respectively, when the transmission band is  $\geq 200 \text{ MHz}$
3. Per KDB 865664 D01v01r03, for each frequency band, repeated SAR measurement is required only when the measured SAR is  $\geq 0.8 \text{ W/kg}$ .
4. Per KDB 248227 D01v02r01, for 2.4GHz 802.11g/n SAR testing is not required 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  $\leq 1.2 \text{ W/kg}$ .
5. For Bluetooth SAR testing was used the same exposure position with 2.4GHz WLAN.
6. During SAR testing the WLAN transmission was verified using a spectrum analyzer.

### 14.1 Body SAR

**<WLAN SAR>**

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Antenna Vendor	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	WLAN2.4GHz	802.11b 1Mbps	Bottom Face	0mm	Main	WNC	11	2462	16.70	17.00	1.072	0.16	0.021	0.023
	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Main	WNC	11	2462	16.70	17.00	1.072	-0.1	0.444	0.476
	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Main	Acon	11	2462	16.70	17.00	1.072	-0.16	0.576	0.617
01	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Main	Acon	1	2412	16.36	17.00	1.159	-0.15	0.602	0.698
	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Main	Acon	6	2437	16.21	17.00	1.199	-0.19	0.472	0.566
	WLAN2.4GHz	802.11b 1Mbps	Bottom Face	0mm	Aux	WNC	11	2462	16.66	17.00	1.081	0.07	0.039	0.042
	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Aux	WNC	11	2462	16.66	17.00	1.081	-0.05	0.484	0.523
	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Aux	Acon	11	2462	16.66	17.00	1.081	0.1	0.402	0.435

**<Bluetooth SAR>**

Plot No.	Band	Mode	Test Position	Gap (mm)	Antenna	Antenna Vendor	Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)
	Bluetooth	2Mbps	Bottom Face	0mm	Main	WNC	39	2441	7.88	8.00	1.028	-0.01	0.001	0.001
	Bluetooth	2Mbps	Edge 1	0mm	Main	WNC	39	2441	7.88	8.00	1.028	-0.02	0.001	0.001
	Bluetooth	2Mbps	Edge 1	0mm	Main	Acon	39	2441	7.88	8.00	1.028	-0.13	0.001	0.001
	Bluetooth	2Mbps	Bottom Face	0mm	Aux	WNC	39	2441	7.88	8.00	1.028	-0.17	0.009	0.009
02	Bluetooth	2Mbps	Edge 1	0mm	Aux	WNC	39	2441	7.88	8.00	1.028	-0.17	0.086	0.088
	Bluetooth	2Mbps	Edge 1	0mm	Aux	WNC	0	2402	7.85	8.00	1.035	-0.06	0.077	0.080
	Bluetooth	2Mbps	Edge 1	0mm	Aux	WNC	78	2480	7.57	8.00	1.104	0.12	0.077	0.085
	Bluetooth	2Mbps	Edge 1	0mm	Aux	Acon	39	2441	7.88	8.00	1.028	-0.17	0.072	0.074



## 15. Simultaneous Transmission Analysis

NO.	Simultaneous Transmission Configurations	Support
1.	WLAN + Bluetooth	Yes

**General Note:**

1. For WLAN operation can select any one of the antenna to transmitting by at a time, for Bluetooth will select the other antenna to work.
2. The Scaled SAR summation is calculated based on the same configuration and test position.
3. Per KDB 447498 D01v05r02, simultaneous transmission SAR is compliant if,
  - i) Scalar SAR summation < 1.6W/kg.
  - ii) SPLSR =  $(\text{SAR1} + \text{SAR2})^{1.5} / (\text{min. separation distance, mm})$ , and the peak separation distance is determined from the square root of  $[(x_1-x_2)^2 + (y_1-y_2)^2 + (z_1-z_2)^2]$ , where  $(x_1, y_1, z_1)$  and  $(x_2, y_2, z_2)$  are the coordinates of the extrapolated peak SAR locations in the zoom scan.
  - iii) If SPLSR  $\leq 0.04$ , simultaneously transmission SAR measurement is not necessary.
  - iv) Simultaneously transmission SAR measurement, and the reported multi-band SAR < 1.6W/kg.

### 15.1 Body Exposure Conditions

Antenna	Exposure Position	1	2	1+2 Summed 1g SAR (W/kg)
		WLAN	Bluetooth	
		1g SAR (W/kg)	1g SAR (W/kg)	
Main Antenna	Bottom Face	0.023	0.009	<b>0.03</b>
	Edge 1	0.698	0.088	<b>0.79</b>
Aux Antenna	Bottom Face	0.042	0.001	<b>0.04</b>
	Edge 1	0.523	0.001	<b>0.52</b>

**Test Engineer :** Ken Li, Angelo Chang and Kurt Liu



## 16. Uncertainty Assessment

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observations is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

A Type A evaluation of standard uncertainty may be based on any valid statistical method for treating data. This includes calculating the standard deviation of the mean of a series of independent observations; using the method of least squares to fit a curve to the data in order to estimate the parameter of the curve and their standard deviations; or carrying out an analysis of variance in order to identify and quantify random effects in certain kinds of measurement.

A type B evaluation of standard uncertainty is typically based on scientific judgment using all of the relevant information available. These may include previous measurement data, experience, and knowledge of the behavior and properties of relevant materials and instruments, manufacturer's specification, data provided in calibration reports and uncertainties assigned to reference data taken from handbooks. Broadly speaking, the uncertainty is either obtained from an outdoor source or obtained from an assumed distribution, such as the normal distribution, rectangular or triangular distributions indicated in table below.

Uncertainty Distributions	Normal	Rectangular	Triangular	U-Shape
Multi-plying Factor <sup>(a)</sup>	$1/k^{(b)}$	$1/\sqrt{3}$	$1/\sqrt{6}$	$1/\sqrt{2}$

- (a) standard uncertainty is determined as the product of the multiplying factor and the estimated range of variations in the measured quantity
- (b)  $k$  is the coverage factor

**Table 16.1. Standard Uncertainty for Assumed Distribution**

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances.

Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. Typically, the coverage factor ranges from 2 to 3. Using a coverage factor allows the true value of a measured quantity to be specified with a defined probability within the specified uncertainty range. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is shown in the following tables.



Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (1g)	Ci (10g)	Standard Uncertainty (1g)	Standard Uncertainty (10g)
<b>Measurement System</b>							
Probe Calibration	6.0	Normal	1	1	1	± 6.0 %	± 6.0 %
Axial Isotropy	4.7	Rectangular	$\sqrt{3}$	0.7	0.7	± 1.9 %	± 1.9 %
Hemispherical Isotropy	9.6	Rectangular	$\sqrt{3}$	0.7	0.7	± 3.9 %	± 3.9 %
Boundary Effects	1.0	Rectangular	$\sqrt{3}$	1	1	± 0.6 %	± 0.6 %
Linearity	4.7	Rectangular	$\sqrt{3}$	1	1	± 2.7 %	± 2.7 %
System Detection Limits	1.0	Rectangular	$\sqrt{3}$	1	1	± 0.6 %	± 0.6 %
Readout Electronics	0.3	Normal	1	1	1	± 0.3 %	± 0.3 %
Response Time	0.8	Rectangular	$\sqrt{3}$	1	1	± 0.5 %	± 0.5 %
Integration Time	2.6	Rectangular	$\sqrt{3}$	1	1	± 1.5 %	± 1.5 %
RF Ambient Noise	3.0	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	± 1.7 %
RF Ambient Reflections	3.0	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	± 1.7 %
Probe Positioner	0.4	Rectangular	$\sqrt{3}$	1	1	± 0.2 %	± 0.2 %
Probe Positioning	2.9	Rectangular	$\sqrt{3}$	1	1	± 1.7 %	± 1.7 %
Max. SAR Eval.	1.0	Rectangular	$\sqrt{3}$	1	1	± 0.6 %	± 0.6 %
<b>Test Sample Related</b>							
Device Positioning	2.9	Normal	1	1	1	± 2.9 %	± 2.9 %
Device Holder	3.6	Normal	1	1	1	± 3.6 %	± 3.6 %
Power Drift	5.0	Rectangular	$\sqrt{3}$	1	1	± 2.9 %	± 2.9 %
<b>Phantom and Setup</b>							
Phantom Uncertainty	4.0	Rectangular	$\sqrt{3}$	1	1	± 2.3 %	± 2.3 %
Liquid Conductivity (Target)	5.0	Rectangular	$\sqrt{3}$	0.64	0.43	± 1.8 %	± 1.2 %
Liquid Conductivity (Meas.)	2.5	Normal	1	0.64	0.43	± 1.6 %	± 1.1 %
Liquid Permittivity (Target)	5.0	Rectangular	$\sqrt{3}$	0.6	0.49	± 1.7 %	± 1.4 %
Liquid Permittivity (Meas.)	2.5	Normal	1	0.6	0.49	± 1.5 %	± 1.2 %
<b>Combined Standard Uncertainty</b>						± 11.0 %	± 10.8 %
<b>Coverage Factor for 95 %</b>						K=2	
<b>Expanded Uncertainty</b>						± 22.0 %	± 21.5 %

Table 16.2. Uncertainty Budget for frequency range 300 MHz to 3 GHz



## **17. References**

- [1] FCC 47 CFR Part 2 "Frequency Allocations and Radio Treaty Matters; General Rules and Regulations"
- [2] ANSI/IEEE Std. C95.1-1992, "IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz", September 1992
- [3] IEEE Std. 1528-2003, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", December 2003
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v02r01, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Jun 2015.
- [6] FCC KDB 447498 D01 v05r02, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Feb 2014
- [7] FCC KDB 616217 D04 v01r01, "SAR Evaluation Considerations for Laptop, Notebook, Netbook and Tablet Computers", May 2013
- [8] FCC KDB 865664 D01 v01r03, "SAR Measurement Requirements for 100 MHz to 6 GHz", Feb 2014.
- [9] FCC KDB 865664 D02 v01r01, "RF Exposure Compliance Reporting and Documentation Considerations" May 2013.