

SZSAR-TRF-01 Rev. A/0 May15,2023

Report No.: SZCR241200465204

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SAR TEST REPORT

SZCR2412004652ET (SGS SZ NO.: T52410360020EM) Application No.:

Applicant: INNOVATION FIRST, INC.

Address of Applicant: 1519 INT.30 W, Greenville Texas 75402, United States

Manufacturer:

Equipment Under Test (EUT):

EUT Name: 249-8581-000 VEX AIM Coding Robot

Item No.: 249-8581-000

Requested Age Grading: 8+

FCC ID: UKU-RAD23

Standards: FCC 47CFR §2.1093

Date of Receipt: 2025-02-17 Date of Test: 2025-02-19 Date of Issue: 2025-02-25

Test Result: PASS *

Kenv Xu **EMC Laboratory Manager**

Keny. Ku



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In the configuration tested, the EUT detailed in this report complied with the standards specified above.



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Revision Record				
Version	Chapter	Date	Modifier	Remark
01		2025-02-25		Original

Authorized for issue by:		
	Moutin Tang	
	Martin Tang/Project Engineer	
	Exic Fu	
	Eric Fu/Reviewer	



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TEST SUMMARY

Test Summary		
Frequency Band	Max Reported SAR10g(W/kg)	
r requericy barro	Limbs	
WI-FI (2.4GHz)	0.073	
BLE	N/A	
SAR Limited(W/kg)	4.0	

N/A: Not applicable. Please refer to Section 7 for further details.



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General Information 1

1.1 General Description of EUT

Product Name:	249-8581-000 VEX AIM	Coding Robot		
Item No.:	249-8581-000			
Product Phase:	production unit	production unit		
Device Type:	portable device			
Exposure Category:	uncontrolled environmer	nt / general population		
Hardware Version:	-910 Rev8			
Software Version	1.0.0.32			
SN:	807648085815			
Antenna Type:	PCB Antenna			
Antenna Gain:	-0.10dBi			
Device Operating Configurations:				
Modulation Mode:	2.4G WIFI:DSSS,OFDM; BT :GFSK			
	Band	Tx(MHz)	Rx(MHz)	
Frequency Bands:	WIFI 2.4G	2412~2462	2412~2462	
	ВТ	2402~2480	2402~2480	
RF Cable:	⊠Provided by applicant □Provided by the laboratory			
	Model:	NSC 1450		
Pattory Information:	Normal Voltage:	DC 3.7V*2		
Battery Information:	Rated capacity:	800mAh		
	Manufacturer:	Huahui New Energy/w	www.huahuienergy.com	

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1.2 DUT Antenna Locations

Please refer to Appendix D



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1.3 Test Specification

Identity	Document Title
FCC 47CFR §2.1093	Radiofrequency Radiation Exposure Evaluation: Portable Devices
ANSI/IEEE C95.1-1992	IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz – 300 GHz.
IEEE 1528-2013	Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques
KDB 248227 D01	SAR Guidance for IEEE 802 11 Wi-Fi SAR v02r02
KDB 447498 D04	Interim General RF Exposure Guidance v01
KDB 865664 D02	RF Exposure Reporting v01r02
KDB 865664 D01	SAR Measurement 100 MHz to 6 GHz v01r04
KDB 690783 D01	SAR Listings on Grants v01r03



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1.4 RF exposure limits

Human Exposure	Uncontrolled Environment General Population	Controlled Environment Occupational
Spatial Peak SAR* (Brain*Trunk)	1.60 mW/g	8.00 mW/g
Spatial Average SAR** (Whole Body)	0.08 mW/g	0.40 mW/g
Spatial Peak SAR*** (Hands/Feet/Ankle/Wrist)	4.00 mW/g	20.00 mW/g

Notes:

Uncontrolled Environments are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

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.)



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^{*} The Spatial Peak value of the SAR averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time

^{**} The Spatial Average value of the SAR averaged over the whole body.

^{***} The Spatial Peak value of the SAR averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube) and over the appropriate averaging time.



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1.5 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen Branch

No. 1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China. 518057.

Tel: +86 755 2601 2053 Fax: +86 755 2671 0594

No tests were sub-contracted.

1.6 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

• A2LA (Certificate No. 3816.01)

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

VCCI (Member No. 1937)

The 3m Fully-anechoic chamber for above 1GHz, 10m Semi-anechoic chamber for below 1GHz, Shielded Room for Mains Port Conducted Interference Measurement and Telecommunication Port Conducted Interference Measurement of SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen EMC laboratory have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-20026, R-14188, C-12383 and T-11153 respectively.

• FCC -Designation Number: CN1336

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1336. Test Firm Registration Number: 787754.

• Innovation, Science and Economic Development Canada

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006.

IC#: 4620C.





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Laboratory Environment 2

Temperature	Min. = 18°C, Max. = 25 °C	
Relative humidity	Min. = 30%, Max. = 70%	
Ground system resistance	< 0.5 Ω	
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.		



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SAR Measurements System Configuration 3

3.1 The SAR Measurement System

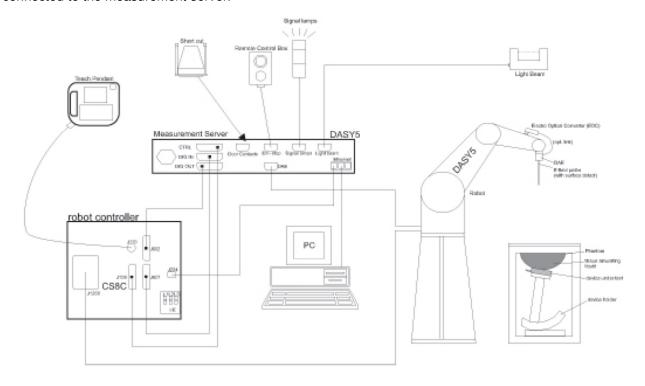
This SAR Measurement System uses a Computer-controlled 3-D stepper motor system (SPEAG DASY professional system). A E-field probe is used to determine the internal electric fields. The SAR can be obtained from the equation SAR= σ (|Ei|2)/ ρ where σ and ρ are the conductivity and mass density of the tissue-Simulate.

The DASY system for performing compliance tests consists of the following items: A standard high precision 6-axis robot (Stabile RX family) with controller, teach pendant and software. An arm extension for accommodation the data acquisition electronics (DAE).

A dosimetric probe, i.e., an isotropic E-field probe optimized and calibrated for usage in tissue simulating liquid. The probe is equipped with an optical surface detector system.

A data acquisition electronics (DAE) which performs the signal amplification, signal multiplexing, ADconversion, offset measurements, mechanical surface detection, collision detection, etc. The unit is battery powered with standard or rechargeable batteries. The signal is optically transmitted to the EOC.

The Electro-optical converter (EOC) performs the conversion between optical and electrical of the signals for the digital communication to DAE and for the analog signal from the optical surface detection. The EOC is connected to the measurement server.



F-1. SAR Measurement System Configuration

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- The function of the measurement server is to perform the time critical tasks such as signal filtering, control of the robot operation and fast movement interrupts.
- A probe alignment unit which improves the (absolute) accuracy of the probe positioning.
- A computer operating Windows system.
- DASY software.
- Remote control with teach pendant and additional circuitry for robot safety such as warning lamps, etc.
- The SAM twin phantom enabling testing left-hand, right-hand and Body Worn usage.
- The device holder for handheld mobile phones.
- Tissue simulating liquid mixed according to the given recipes.
- Validation dipole kits allowing to validating the proper functioning of the system.



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3.2 **Isotropic E-field Proble EX3DV4**

	Symmetrical design with triangular core 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 TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)
Dynamic Range	10 μW/g to > 100 mW/g Linearity: \pm 0.2 dB (noise: typically < 1 μW/g)
Dimensions	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 2.5 mm (Body: 12 mm) Typical distance from probe tip to dipole centers: 1 mm
Application	High precision dosimetric measurements in any exposure scenario (e.g., very strong gradient fields); the only probe that enables compliance testing for frequencies up to 6 GHz with precision of better 30%.
Compatibility	DASY52 SAR and higher, EASY4/MRI





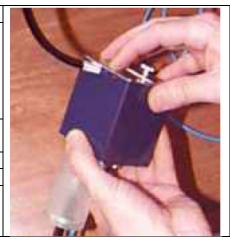
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3.3 **Data Acquisition Electronics (DAE)**

Model	DAE
Construction	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY4/5 embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.
Measurement Range	-100 to +300 mV (16 bit resolution and two range settings: 4mV,400mV)
Input Offset Voltage	< 5µV (with auto zero)
Input Bias Current	< 50 f A
Dimensions	60 x 60 x 68 mm



SAM Twin Phantom 3.4

Material	Vinylester, glass fiber reinforced (VE-GF)
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)
Shell Thickness	2 ± 0.2 mm (6 ± 0.2 mm at ear point)
Dimensions (incl. Wooden Support)	Length: 1000 mm Width: 500 mm Height: adjustable feet
Filling Volume	pprox 25 liters
Wooden Support	SPEAG standard phantom table



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.

Twin SAM V5.0 has the same shell geometry and is manufactured from the same material as Twin SAM V4.0, but has reinforced top structure.



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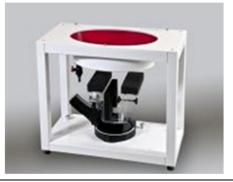
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3.5 **ELI Phantom**

Material	Vinylester, glass fiber reinforced (VE-GF)		
Liquid Compatibility	Compatible with all SPEAG tissue simulating liquids (incl. DGBE type)		
Shell Thickness	2.0 ± 0.2 mm(bottom plate)		
Dimensions	Major axis: 600 mm Minor axis: 400 mm		
Filling Volume	pprox 30 liters		
Wooden Support	SPEAG standard phantom table		



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.

ELI V5.0 has the same shell geometry and is manufactured from the same material as ELI4 but has reinforced top structure.





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3.6 **Device Holder for Transmitters**



F-2. Device Holder for Transmitters

- The DASY device holder is designed to cope with different positions given in the standard. It has two scales for the device rotation (with respect to the body axis) and the device inclination (with respect to the line between the ear reference points). The rotation centres for both scales are the ear reference point (ERP). Thus the device needs no repositioning when changing the angles.
- The DASY device holder has been made out of low-loss POM material having the following dielectric parameters: relative permittivity $\varepsilon=3$ 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.



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3.7 **Measurement Procedure**

3.7.1 Scanning procedure

Step 1: Power reference measurement

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.

Step 2: Area scan

The SAR distribution at the exposed side of the head was measured at a distance of 4mm from the inner surface of the shell. The area covered the entire dimension of the head and the horizontal grid spacing was 15mm*15mm or 12mm*12mm or 10mm*10mm.Based on the area scan data, the area of the maximum absorption was determined by spline interpolation.

Step 3: Zoom scan

Around this point, a volume of 32mm*32mm*30mm (f≤2GHz), 30mm*30mm*30mm (f for 2-3GHz) and 24mm*24mm*22mm (f for 5-6GHz) was assessed by measuring 5x5x7 points (f≤2GHz), 7x7x7 points (f for 2-3GHz) and 7x7x12 points (f for 5-6GHz). On this basis of this data set, the spatial peak SAR value was evaluated with the following procedure:

The data at the surface was extrapolated, since the centre of the dipoles is 2.0mm away from the tip of the probe and the distance between the surface and the lowest measuring point is 1.2mm. (This can be variable. Refer to the probe specification). The extrapolation was based on a least square algorithm. A polynomial of the fourth order was calculated through the points in z-axes. This polynomial was then used to evaluate the points between the surface and the probe tip. The maximum interpolated value was searched with a straightforward algorithm. Around this maximum the SAR values averaged over the spatial volumes (1g or 10g) were computed using the 3D-Spline interpolation algorithm. The volume was integrated with the trapezoidal algorithm. One thousand points were interpolated to calculate the average. All neighbouring volumes were evaluated until no neighboring volume with a higher average value was found.

The area and zoom scan resolutions specified in the table below must be applied to the SAR measurements Probe boundary effect error compensation is required for measurements with the probe tip closer than half a probe tip diameter to the phantom surface. Both the probe tip diameter and sensor offset distance must satisfy measurement protocols; to ensure probe boundary effect errors are minimized and the higher fields closest to the phantom surface can be correctly measured and extrapolated to the phantom surface for computing 1-g SAR. Tolerances of the post-processing algorithms must be verified by the test laboratory for the scan resolutions used in the SAR measurements, according to the reference distribution functions specified in IEEE Std. 1528-2013.





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			≤ 3 GHz	> 3 GHz	
Maximum distance from (geometric center of pr			5 ± 1 mm	½·8·ln(2) ± 0.5 mm	
Maximum probe angle surface normal at the n			30° ± 1°	20° ± 1°	
			≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm	
Maximum area scan spatial resolution: $\Delta x_{Area}, \Delta y_{Area}$			When the x or y dimension o measurement plane orientation the measurement resolution r x or y dimension of the test d measurement point on the test	on, is smaller than the above, must be ≤ the corresponding levice with at least one	
Maximum zoom scan s	patial reso	lution: Δx_{Zoom} , Δy_{Zoom}	\leq 2 GHz: \leq 8 mm 3 - 4 GHz: \leq 5 mm* 4 - 6 GHz: \leq 4 mm*		
	uniform	grid: Δz _{Z∞m} (n)	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
Maximum zoom scan spatial resolution, normal to phantom surface	graded	Δz _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm	
Stateco	grid $\Delta z_{Z_{00m}}(n>1)$: between subsequent points		≤ 1.5·Δz	Zoom(n-1)	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	

Step 4: Power reference measurement (drift)

The Power Drift Measurement job measures the field at the same location as the most recent power reference measurement job within the same procedure, and with the same settings. The indicated drift is mainly the variation of the DUT's output power and should vary max. ± 5 %



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3.7.2 Data storage

The DASY 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], [m W/g], [m W/cm²], [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.

3.7.3 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:

3

Probe parameters: - Sensitivity Normi, ai0, ai1, ai2

Conversion factorDiode compression pointConvFiDcpi

Device parameters: - Frequency f

- Crest factor cf Media parameters: - Conductivity

- Density p

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 DASY components. In the

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.

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.

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:

$$V_i = U_i + U_i^2 \cdot c f / d c p_i$$

With Vi = compensated signal of channel I (I = x, y, z)

Ui = 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:



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$$E_i = (V_i / Norm_i \cdot ConvF)^{1/2}$$

H-field probes:

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

With Vi = compensated signal of channel I (I = x, y, z)

Normi = sensor sensitivity of channel I

[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]

Ei = electric field strength of channel I in V/m

Hi = magnetic field strength of channel I in A/m

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

$$E_{tot} = (E_x^2 + E_y^2 + E_z^2)^{1/2}$$

$$E_{tot} = (E_x^2 + E_y^2 + E_z^2)^{1/2}$$

The primary field data are used to calculate the derived field units. $SAR = (E_tot^2 \cdot \sigma) / (\varepsilon \cdot 1000)$

SAR = local specific absorption rate in mW/g

Etot = total field strength in V/m

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

ε= equivalent tissue density in g/cm3

Note that the density is normally set to 1 (or 1.06), 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.

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

with Ppwe = equivalent power density of a plane wave in mW/cm2

Etot = total electric field strength in V/m

Htot = total magnetic field strength in A/m



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4 SAR measurement variability and uncertainty

4.1 SAR measurement variability

Per KDB 865664 D01 SAR measurement 100 MHz to 6 GHz v01r04, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissueequivalent 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-q 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.

4.2 SAR measurement uncertainty

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.





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Desciption of Test Position 5

5.1 The Limbs Test Position

This EUT was tested in different positions. In these positions, the surface of EUT is touching phantom with 0 mm. The SAR Exclusion Threshold in KDB 447498 D01 can be applied to determine SAR test exclusion for adjacent edge configurations. The closest distance from the antenna to an adjacent device surface is used to determine if SAR testing is required for the adjacent surfaces, with the adjacent surface positioned against the phantom and the surface containing the antenna positioned perpendicular to the phantom.



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6 **SAR System Verificaion Procedure**

Tissue Simulate Liquid 6.1

6.1.1 Recipes for Tissue Simulate Liquid

The bellowing tables give the recipes for tissue simulating liquids to be used in different frequency bands:

Ingredients	Frequency (MHz)								
(% by weight)	450	700-1000	1700-2000	2300-2500	2500-2700				
Water	38.56	40.30	55.24	55.00	54.92				
Salt (NaCl)	3.95	1.38	0.31	0.2	0.23				
Sucrose	56.32	57.90	0	0	0				
HEC	0.98	0.24	0	0	0				
Bactericide	0.19	0.18	0	0	0				
Tween	0	0	44.45	44.80	44.85				

Salt: 99+% Pure Sodium Chloride Sucrose: 98+% Pure Sucrose Water: De-ionized, 16 MΩ+ resistivity HEC: Hydroxyethyl Cellulose

Tween: Polyoxyethylene (20) sorbitan monolaurate

HSL5GHz is composed of the following ingredients: (Manufactured by SPEAG)

Water: 50-65% Mineral oil: 10-30% Emulsifiers: 8-25% Sodium salt: 0-1.5%

Table 1: Recipe of Tissue Simulate Liquid



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6.1.2 Measurement for Tissue Simulate Liquid

The Conductivity (σ) and Permittivity (ϵr) are listed in Table 2. For the SAR measurement given in this report.

The temperature variation of the Tissue Simulate Liquids was 22±2℃.

•	Measurement for Tissue Simulate Liquid									
Hissue	Measured Frequency			Measured Tissue Target Tissue (±5%)		Deviation (Within ±5%)		Liquid Temp.	Test	
Туре	(MHz)	εr	σ(S/m)	٤r	σ(S/m)	٤r	σ(S/m)	(℃)	Date	
2412 Head	2412	38.841	1.743	39.28	1.77	-1.11%	-1.36%	22.5	2025/2/19	
2437 Head	2437	38.834	1.768	39.23	1.79	-1.00%	-1.16%	22.5	2025/2/19	
2450 Head	2450	38.828	1.781	39.20	1.80	-0.95%	-1.06%	22.5	2025/2/19	
2462 Head	2462	38.735	1.802	39.18	1.81	-1.13%	-0.46%	22.5	2025/2/19	

Table 2: Measurement result of Tissue electric parameters



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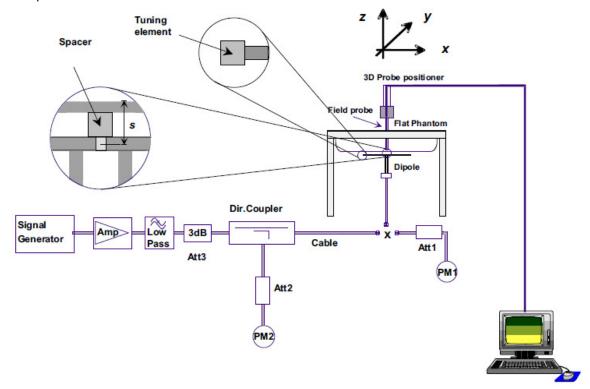
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6.2 **SAR System Check**

The microwave circuit arrangement for system Check is sketched in F-12. The daily system accuracy verification occurs within the flat section of the SAM phantom. A SAR measurement was performed to see if the measured SAR was within +/- 10% from the target SAR values. The tests were conducted on the same days as the measurement of the EUT. The obtained results from the system accuracy verification are displayed in the following table (A power level of 250mW (below 3GHz) or 100mW (3-6GHz) was input to the dipole antenna). During the tests, the ambient temperature of the laboratory was in the range 22±2°C, the relative humidity was in the range 60% and the liquid depth above the ear reference points was above 15±0.5 cm in all the cases. It is seen that the system is operating within its specification, as the results are within acceptable tolerance of the reference values.



F-12. The microwave circuit arrangement used for SAR system Check



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6.2.1 Justification for Extended SAR Dipole Calibrations

- 1) 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. 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) Return-loss is within 20% of calibrated measurement;
- d) Impedance is within 5Ω from the previous measurement.
- 2) Network analyzer probe calibration against air, distilled water and a shorting block performed before measuring liquid parameters.



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6.2.2 Summary System Check Result(s)

SAR System Validation Result(s)										
Validation Kit	Measured SAR 250mW	Measured SAR 250mW	Measured SAR (normalized to 1W)	Measured SAR (normalized to 1W)	(normalized	Target SAR (normalized to 1W)	Devi	Deviation (Within ±10%) Liquid Temp. Test Date		
Validation Kit	1g (W/kg)	10g (W/kg)	1g (W/kg)	10g (W/kg)	1-g(W/kg)	10-g(W/kg)	1- g(W/kg)	10- g(W/kg)	(℃)	
D2450V2Head	13.60	6.38	54.40	25.52	52.20	24.30	4.21%	5.02%	22.5	2025/2/19

Table 3: SAR System Check Result

6.2.3 Detailed System Check Results

Please see the Appendix A



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7 FCC Radio frequency radiation exposure limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

7.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

7.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency			Minimum Distance			Threshold ERP
<i>f</i> ∟ MHz		f _H MHz	λ_L / 2π		λ _H / 2π	W
0.3	_	1.34	159 m	_	35.6 m	1,920 R ²
1.34	_	30	35.6 m	-	1.6 m	3,450 R ² /f ²
30	_	300	1.6 m	-	159 mm	3.83 R ²
300	_	1,500	159 mm	_	31.8 mm	0.0128 R ² f
1,500	_	100,000	31.8 mm	_	0.5 mm	19.2R ²

Subscripts L and H are low and high; λ is wavelength.

From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The thresholds are based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.



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For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary if the ERP of the device is greater than ERP20cm in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{\text{th }}(\text{mW}) = ERP_{20 \text{ cm }}(\text{mW}) = \begin{cases} 2040f & 0.3 \text{ GHz} \le f < 1.5 \text{ GHz} \\ \\ 3060 & 1.5 \text{ GHz} \le f \le 6 \text{ GHz} \end{cases}$$
(B. 1)

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

Limit calculation						
Frequency range	Frequency(MHz)	$R(\lambda/2\pi)(m)$	Threshold ERP(W)			
300~1500MHz	915	0.0522	0.032			
1500~100000MHz	2480	0.0193	0.007			

7.3 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).



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This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). Pth is given by Formula (B.2).

$$P_{\text{th}} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \le 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \le 40 \text{ cm} \end{cases}$$
(B. 2)

where

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

and f is in GHz, d is the separation distance (cm), and ERP_{20cm} is per Formula (B.1).

Example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

Table B.E. Example Fewer Timesholds (IIIV)										
Frequency	Distance(mm)									
(MHz)	5	10	15	20	25	30	35	40	45	50
300	39	65	88	110	129	148	166	184	201	217
450	22	44	67	89	112	135	158	180	203	226
835	9	25	44	66	90	116	145	175	207	240
1900	3	12	26	44	66	92	122	157	195	236
2450	3	10	22	38	59	83	111	143	179	219
3600	2	8	18	32	49	71	96	125	158	195
5800	1	6	14	25	40	58	80	106	136	169

Limit calculation								
Frequency range(GHz) Frequency(GHz) X Distance(cm) Pth (mW)								
0.3~1.5	0.915	1.474	0.5	8.133				
1.5~6	2.48	1.905	0.5	2.717				



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8 Measurement and Calculation

8.1 Maximum transmit power

Test Mode	Frequency	Maximum Conducted Power [dBm]	Maximum Conducted Power [mW]
BLE	2480	3.16	2.07

The Power Data is based on the RF Test report SZCR241200465203.

The antenna gain is -0.10dBi.

8.2 RF Exposure Calculation

The Maximum Conducted Power is 2.07mW; The best case gain of the antenna is -0.10dBi.

Remark: we used the EIRP between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

Note1: Bluetooth and WiFi can not be transmitted simultaneously.

	Evaluation method	Exempt Limit(mW)	Verdict
	Blanket 1 mW Blanket Exemption	1mW	N/A
	MPE-based Exemption(ERP)	7mW(ERP)	N/A
\boxtimes	SAR-based Exemption(P_{th})	2.7mW	Yes

The EUT(BLE) meet the Exemption Limits for Routine Evaluation – SAR Evaluation, so no SAR evaluation is required for BLE.





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Test Configuration 9

Operation Configurations 9.1

9.1.1 WIFI Test Configuration

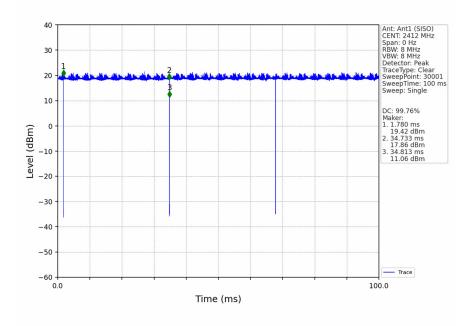
For WiFi 2.4G, a communication link is set up with the test mode software for Wi-Fi mode test. The Absolute Radio Frequency Channel Number (ARFCN) is allocated to 1,6 and 11 respectively in the case of 2450 MHz during the test at each test frequency channel. the EUT is operated at the RF continuous emission mode. Each channel should be tested at the lowest rate. Operating modes are tested independently according to the service requirements in each frequency band. Operating modes are tested on channel 1, 6, 11; however, if output power reduction is necessary for channels 1 and/or 13 to meet restricted band requirements the highest output channel closest to each of these channels must be tested instead.

SAR is not required for 802.11g/n channels when the maximum average output power is less than 0.25dB higher than that measured on the corresponding 802.11b channels.

9.1.2 Duty cycle

1) 2.4GHz Wi-Fi 802.11b:

2412MHz duty cycle: 99.76%





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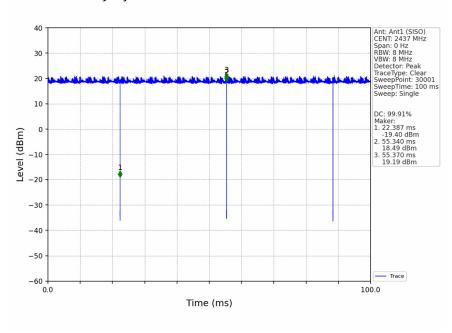


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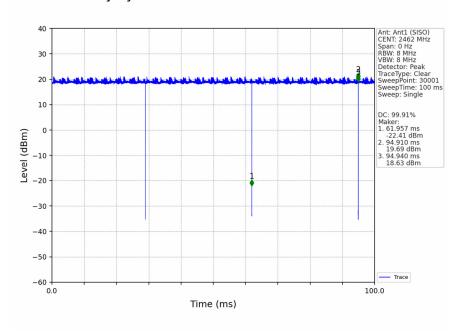
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2437MHz duty cycle: 99.91%



2462MHz duty cycle: 99.91%





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9.1.2.1 Initial Test Position SAR Test Reduction Procedure

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. The initial test position procedure is described in the following:

- 1). When the reported SAR of the initial test position is ≤ 0.4 W/kg, further SAR measurement is not required for the other (remaining) test positions in that exposure configuration and 802.11 transmission mode combinations within the frequency band or aggregated band. SAR is also not required for that exposure configuration in the subsequent test configuration(s).
- 2). When the reported SAR of the initial test position is > 0.4 W/kg, SAR is repeated for the 802.11 transmission mode configuration tested in the initial test position using subsequent highest extrapolated or estimated 1-g SAR conditions determined by area scans or next closest/smallest test separation distance and maximum RF coupling test positions based on manufacturer justification, on the highest maximum output power channel, until the reported SAR is ≤ 0.8 W/kg or all required test positions (left, right, touch, tilt or subsequent surfaces and edges) are tested.
- 3). For all positions/configurations tested using the initial test position and subsequent test positions, 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 ≤ 1.2 W/kg or all required channels are tested. a) Additional power measurements may be required for this step, which should be limited to those necessary for identifying the subsequent highest output power channels.

9.1.2.2 Initial Test Configuration Procedures

An initial test configuration is determined for OFDM 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. For configurations with the same specified or measured maximum output power, additional transmission mode and test channel selection procedures are required. SAR test reduction for subsequent highest output test channels is determined according to reported SAR of the initial test configuration.

For next to the ear, hotspot mode and UMC mini-tablet exposure configurations where multiple test positions are required, the initial test position procedure is applied to minimize the number of test positions required for



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SAR measurement using the initial test configuration transmission mode. For fixed exposure conditions that do not have multiple SAR test positions, SAR is measured in the transmission mode determined by the initial test configuration.

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.

9.1.2.3 Subsequent Test Configuration Procedures

SAR measurement requirements for the remaining 802.11 transmission mode configurations that have not been tested in the initial test configuration are determined separately for each standalone and aggregated frequency band, in each exposure condition, according to the maximum output power specified for production units. The initial test position procedure is applied to next to the ear, UMPC mini-tablet and hotspot mode configurations. When the same maximum output power is specified for multiple transmission modes, additional power measurements may be required to determine if SAR measurements are required for subsequent highest output power channels in a subsequent test configuration. The subsequent test configuration and SAR measurement procedures are described in the following.

- 1) When SAR test exclusion provisions of KDB Publication 447498 are applicable and SAR measurement is not required for the initial test configuration, SAR is also not required for the next highest maximum output power transmission mode subsequent test configuration(s) in that frequency band or aggregated band and exposure configuration.
- 2) 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 position requirements, is adjusted by the ratio of the subsequent test configuration to 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.
- 3) . The number of channels in the initial test configuration and subsequent test configuration can be different due to differences in channel bandwidth. When SAR measurement is required for a subsequent test configuration and the channel bandwidth is smaller than that in the initial test configuration, all channels in the subsequent test configuration that overlap with the larger bandwidth channel tested in the initial test configuration should be used to determine the highest maximum output power channel. This step requires additional power measurement to identify the highest maximum output power channel in the subsequent test configuration to determine SAR test reduction.
 - SAR should first be measured for the channel with highest measured output power in the subsequent test configuration.
 - b) 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. i) For channels with the same measured maximum output power, SAR should be measured using the channel closest to the center frequency of the larger channel bandwidth channel in the initial test configuration.
- 4) . SAR measurements for the remaining highest specified maximum output power OFDM transmission mode configurations that have not been tested in the initial test configuration (highest maximum output) or subsequent test configuration(s) (subsequent next highest maximum output power) is determined by recursively applying the subsequent test configuration procedures in this section to the remaining



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configurations according to the following:

- replace "subsequent test configuration" with "next subsequent test configuration" (i.e., subsequent next highest specified maximum output power configuration)
- replace "initial test configuration" with "all tested higher output power configurations"

9.1.2.4 2.4 GHz Wi-Fi SAR Procedures

Separate SAR procedures are applied to DSSS and OFDM configurations in the 2.4 GHz band to simplify DSSS test requirements. For 802.11b DSSS SAR measurements, DSSS SAR procedure applies to fixed exposure test position and initial test position procedure applies to multiple exposure test positions. When SAR measurement is required for an OFDM configuration, the initial test configuration, subsequent test configuration and initial test position procedures are applied. The SAR test exclusion requirements for 802.11g/n OFDM configurations are described in following.

802.11b DSSS SAR Test Requirements

SAR is measured for 2.4 GHz 802.11b DSSS using either a fixed test position or, when applicable, the initial test position procedure. SAR test reduction is determined according to the following:

- 1) . 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.
- 2) . 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; i.e., all channels require testing.
 - 2.4 GHz 802.11g/n OFDM SAR Test Exclusion Requirements

When SAR measurement is required for 2.4 GHz 802.11g/n OFDM configurations, the measurement and test reduction procedures for OFDM are applied (section 5.3, including sub-sections). SAR is not required for the following 2.4 GHz OFDM conditions.

1) . When KDB Publication 447498 SAR test exclusion applies to the OFDM configuration. 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.





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Test Result 10

10.1 Measurement of RF Conducted Power

WIFI 2.4GHz								
Mode Channel		Frequency (MHz)	Data Rate(Mbps)	Average Power (dBm) Main Ant	Tune up			
	1	2412		4.60	6.5			
802.11b	6	2437	1	5.08	6.5			
	11	2462		5.67	6.5			
	1	2412		5.39	6.5			
802.11g	6	2437	6	5.83	6.5			
	11	2462		6.42	6.5			
000 115	1	2412		5.06	6.5			
802.11n HT20 SISO	6	2437	MCS0	5.51	6.5			
11120 0100	11	2462		6.04	6.5			
802.11n	1	2422		6.04	6.5			
602.1111 HT40 SISO	4	2437	MCS0	6.24	6.5			
11140 0100	7	2452		6.42	6.5			



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10.2 Measurement of SAR Data

10.2.1 SAR Result of WIFI 2.4GHz

Wi-Fi 2.4G SAR Test Record												
Test position	Test mode	Test ch./Freq.	Duty Cycle	Duty Cycle Scaled factor	SAR (W/kg) 1-g	SAR (W/kg) 10-g	Power drift (dB)	Conducted Power(dBm)		Scaled factor	Scaled SAR 10-g (W/kg)	Liquid Temp.(℃)
	Limbs Test Data (0mm)											
Front side	802.11b	11/2462	99.91%	1.001	0.050	0.022	-0.02	5.67	6.50	1.211	0.027	22.1
Back side	802.11b	11/2462	99.91%	1.001	0.022	0.008	0.05	5.67	6.50	1.211	0.010	22.1
Left side	802.11b	11/2462	99.91%	1.001	0.031	0.012	0.09	5.67	6.50	1.211	0.015	22.1
Right side	802.11b	11/2462	99.91%	1.001	0.053	0.026	0.01	5.67	6.50	1.211	0.032	22.1
Top side	802.11b	11/2462	99.91%	1.001	0.074	0.032	0.07	5.67	6.50	1.211	0.039	22.1
Bottom side	802.11b	11/2462	99.91%	1.001	0.020	0.007	0.03	5.67	6.50	1.211	0.008	22.1
Top side	802.11b	6/2437	99.91%	1.001	0.084	0.037	0.06	5.08	6.50	1.387	0.051	22.1
Top side	802.11b	1/2412	99.76%	1.002	0.105	0.047	0.11	4.60	6.50	1.549	0.073	22.1

Note:

- The maximum Scaled SAR value is marked in bold. Graph results refer to Appendix B. 1)
- 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 for 1-g or 2.0W/kg for 10-g respectively, when the transmission band is ≤ 100MHz.
 - ≤ 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.

When the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR test for the other 802.11 modes are not required.

When the highest reported SAR for the initial test configuration is adjusted by the ratio of the subsequent test configuration to initial test configuration specified maximum output power and the adjusted SAR is ≤ 1.2 W/kg, SAR test for the other 802.11 modes are not required.



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Equipment list 11

	<u> </u>										
	Test Platform	SPEAG DASY									
	Description	SAR Test System									
Sc	ftware Reference	DASY52 52.10.4(1527); SEMCAD X 14.6.14(7483)									
Hardware Reference											
Equipment		Manufacturer	Model	Inventory No.	Calibration Date	Due date of calibration					
\boxtimes	Test Phantom	SPEAG	SAM Twin	SZ-WSR-A-020	NCR	NCR					
$\overline{\boxtimes}$	DAE	SPEAG	DAE4	SZ-WSR-M-081	2024/08/15	2025/08/14					
	E-Field Probe	SPEAG	EX3DV4	SZ-WSR-M-082	2024/09/19	2025/09/18					
	Validation Kits	SPEAG	D2450V2	SZ-WSR-M-039	2022/11/02	2025/11/01					
	Dielectric parameter probes	SPEAG	DAKS-3.5	SZ-WSR-M-053	2024/06/26	2025/06/25					
\boxtimes	Vector Network Analyzer and Vector Reflectometer	SPEAG	DAKS_VNA R140	SZ-WSR-M-054	2024/06/26	2025/06/25					
\boxtimes	RF Bi-Directional Coupler	Agilent	86205- 60001	SZ-WSR-A-004	NCR	NCR					
\boxtimes	Signal Generator	Agilent	N5171B	SZ-WSR-M-006	2025/01/07	2026/01/06					
\boxtimes	Preamplifier	Mini-Circuits	ZHL-42W	SZ-WSR-A-001	NCR	NCR					
	Preamplifier	Compliance Directions Systems Inc.	AMP28-3W	SZ-WSR-A-002	NCR	NCR					
\boxtimes	Power Meter	Agilent	E4416A	SZ-WSR-M-007	2025/01/07	2026/01/06					
\boxtimes	Power Sensor	Agilent	8481H	SZ-WSR-M-008	2025/01/07	2026/01/06					
\boxtimes	Power Sensor	R&S	NRP-Z92	SZ-WSR-M-009	2025/01/08	2026/01/07					
\boxtimes	Attenuator	SHX	TS2-3dB	SZ-WSR-A-012	NCR	NCR					
	Speed reading thermometer	Zhengzhou Boyang Instrument	TP3001	SZ-WSR-M-014	2024/05/30	2025/05/29					
\boxtimes	Temperature MingGao		T809	SZ-WSR-M-015	2024/05/30	2025/05/29					
\boxtimes	Temperature	MingGao	T809	SZ-WSR-M-016	2024/05/30	2025/05/29					
	Humidity and Temperature Indicator	CHIGAO	HTC-1	SZ-WSR-M-013	2024/05/28	2025/05/27					
\boxtimes	Humidity and Temperature Indicator	CHIGAO	HTC-1	SZ-WSR-M-012	2024/05/28	2025/05/27					
	Humidity and Temperature Indicator	CHIGAO	HTC-1	SZ-WSR-M-011	2024/05/28	2025/05/27					

Note: All the equipment are within the valid period when the tests are performed.



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12 Calibration certificate

Please see the Appendix C

Photographs 13

Please see the Appendix D

Appendix A: Detailed System Check Results

Appendix B: Detailed Test Results

Appendix C: Calibration certificate

Appendix D: Photographs

--- End of report ---



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