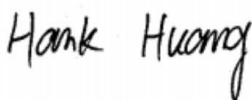


FCC SAR Test Report

APPLICANT : Amazon.com Services LLC
EQUIPMENT : Electronic Display Device
MODEL NAME : PA2MA5
FCC ID : 2A4DH-2425
STANDARD : FCC 47 CFR Part 2 (2.1093)

We, Sporton International Inc. (Shenzhen), would like to declare that the tested sample has been evaluated in accordance with the test procedures given in 47 CFR Part 2.1093 and FCC KDB and has 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. (Shenzhen), the test report shall not be reproduced except in full.



Approved by: Hank Huang

Sporton International Inc. (Shenzhen)

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People's Republic of China



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Revision History

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA510202-02	Rev. 01	Initial issue of report	Aug. 11, 2025

1. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for **Amazon.com Services LLC, Electronic Display Device, PA2MA5**, are as follows.

Highest 1g SAR Summary				
Equipment Class	Frequency Band		Body (Separation 0mm)	Highest Simultaneous Transmission 1g SAR (W/kg)
			1g SAR (W/kg)	
DTS	WLAN	2.4GHz WLAN	0.10	-
NII		5GHz WLAN	0.60	0.62
DSS	Bluetooth	2.4GHz Bluetooth	<0.10	0.62
Date of Testing:			2025/7/21 ~ 2025/7/22	

Declaration of Conformity:

The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.

Comments and Explanations:

The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.

This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg for Partial-Body 1g SAR) 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 1528-2013 and FCC KDB publications.



2. Administration Data

Sporton International Inc. (Shenzhen) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.01.

Testing Laboratory			
Test Firm	Sporton International Inc. (Shenzhen)		
Test Site Location	1/F, 2/F, Bldg 5, Shiling Industrial Zone, Xinwei Village, Xili, Nanshan, Shenzhen, 518055 People's Republic of China TEL: +86-755-86379589 FAX: +86-755-86379595		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR01-SZ	CN1256	421272

Applicant	
Company Name	Amazon.com Services LLC
Address	410 Terry Avenue N Seattle, WA 98109-5210 United States

3. Data Reuse Approach

3.1 Introduction Section

This application re-uses data collected on a similar device, FCC ID: 2A4DH-2424 (reference model) and FCC ID: 2A4DH-2425 (variant model). Due to the same design are identical between parent model and variant model, SAR data reuse is requested and spot check data in this report is used to justify the SAR data reuse.

Per KDB 484596 D01 v03 Section 3.2.2, variants and parent models always satisfy Eq.(6) , and the WLAN/BT max SAR summary was always choose the higher SAR between parent model and variant model.

The applicant should take full responsibility that the test data as referenced in this report represent compliance for this FCC ID: 2A4DH-2425

3.2 Model Difference Information

The **main** difference between FCC ID: 2A4DH-2424 and FCC ID: 2A4DH-2425 is as below:

- Changed Display screen;
- Changed DRAM and Storage for sales options;

Other differences and all the details of similarity and difference can be found in the confidential documents (PA2MA5_Operational Description of Product Equality Declaration).

3.3 Reference detail Section

Rule Part	Equipment Class	Wireless Technology	Frequency Band (MHz)	FCC ID (Reference)	Type Grant/ Permissive Change	Reference Title	FCC ID Filling (Variant)	Test on the variant
Part 2.1093	DTS	BLE/ WiFi	2400~2483.5	2A4DH-2424	Original Grant	FA510202-01	2A4DH-2425	Spot check
	NII	Wi-Fi	5150 ~ 5250 5250 ~ 5350 5470 ~ 5725 5725 ~ 5850	2A4DH-2424	Original Grant	FA510202-01	2A4DH-2425	Spot check
	DSS	Bluetooth	2400~2483.5	2A4DH-2424	Original Grant	FA510202-01	2A4DH-2425	Spot check

4. Guidance Applied

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 1528-2013
- FCC KDB 865664 D01 SAR Measurement 100 MHz to 6 GHz v01r04
- FCC KDB 865664 D02 SAR Reporting v01r02
- FCC KDB 248227 D01 802.11 Wi-Fi SAR v02r02
- FCC KDB 447498 D04 Interim General RF Exposure Guidance v01
- FCC KDB 484596 D01 Referencing Test Data v03

5. Equipment Under Test (EUT) Information

5.1 General Information

Product Feature & Specification	
Equipment Name	Electronic Display Device
Model Name	PA2MA5
FCC ID	2A4DH-2425
S/N	G0B4PH0352740065
Wireless Technology and Frequency Range	WLAN 2.4GHz Band: 2412 MHz ~ 2472 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5720 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	WLAN 2.4GHz 802.11b/g/n HT20 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac VHT20/VHT40/VHT80 Bluetooth BR/EDR/LE
Remark: 1. This device has no voice function. 2. The 2.4GHz/5GHz/BT WLAN can transmit in SISO mode only.	

6. RF Exposure Limits

6.1 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.

6.2 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

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.

7. Specific Absorption Rate (SAR)

7.1 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.

7.2 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:

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

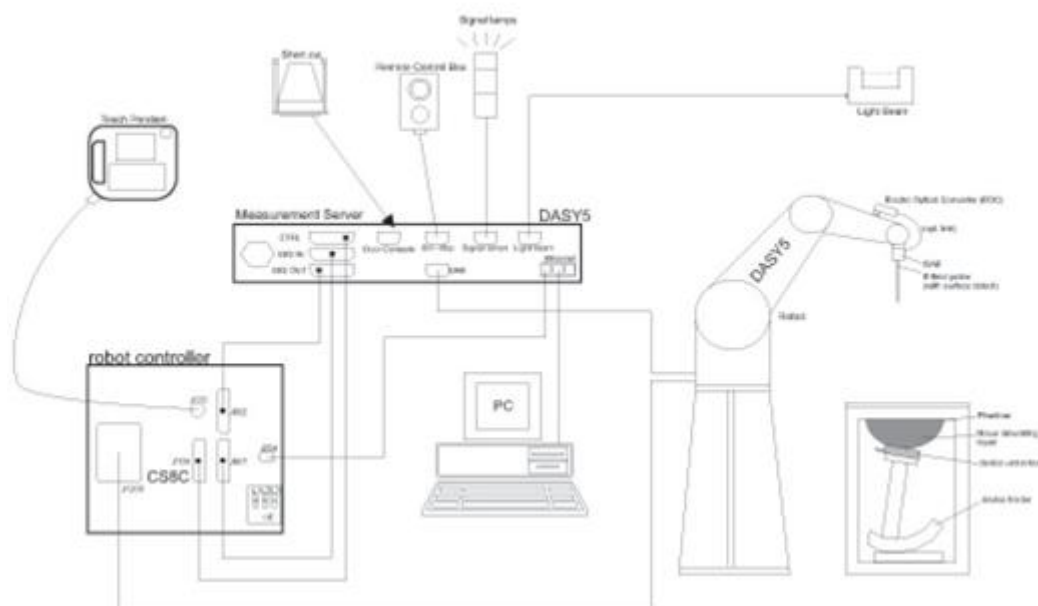
SAR is expressed in units of Watts per kilogram (W/kg)

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

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

8. 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.

8.1 E-Field Probe

The SAR measurement is conducted with the dosimetric probe (manufactured by SPEAG). The probe is specially designed and calibrated for use in liquid with high permittivity. The dosimetric probe has special calibration in liquid at different frequency. This probe has a built in optical surface detection system to prevent from collision with phantom.

<EX3DV4 Probe>

Construction	Symmetric design with triangular core Built-in shielding against static charges PEEK enclosure material (resistant to organic solvents, e.g., DGBE)	
Frequency	4 MHz – 10 GHz Linearity: ± 0.2 dB (30 MHz – 10 GHz)	
Directivity	± 0.3 dB in TSL (rotation around probe axis) ± 0.5 dB in TSL (rotation normal to probe axis)	
Dynamic Range	10 μ W/g – >100 mW/g Linearity: ± 0.2 dB (noise: typically <1 μ W/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	

8.2 Data Acquisition Electronics (DAE)

The data acquisition electronics (DAE) consists of a highly sensitive electrometer-grade preamplifier with auto-zeroing, a channel and gain-switching multiplexer, a fast 16 bit AD-converter and a command decoder and control logic unit. Transmission to the measurement server is accomplished through an optical downlink for data and status information as well as an optical uplink for commands and the clock.

The input impedance of the DAE is 200 MOhm; the inputs are symmetrical and floating. Common mode rejection is above 80 dB.



Photo of DAE

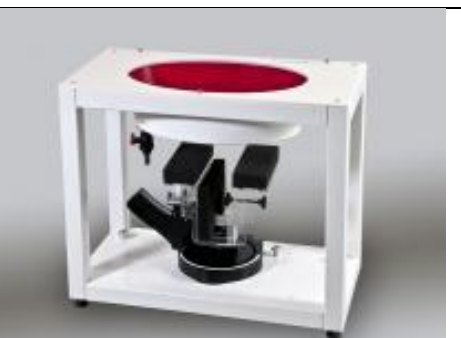
8.3 Phantom

<SAM Twin Phantom>

Shell Thickness	2 ± 0.2 mm; Center ear point: 6 ± 0.2 mm	
Filling Volume	Approx. 25 liters	
Dimensions	Length: 1000 mm; Width: 500 mm; Height: adjustable feet	
Measurement Areas	Left Hand, Right Hand, Flat Phantom	

The bottom plate contains three pair of bolts for locking the device holder. The device holder positions are adjusted to the standard measurement positions in the three sections. A white cover is provided to tap the phantom during off-periods to prevent water evaporation and changes in the liquid parameters. On the phantom top, three reference markers are provided to identify the phantom position with respect to the robot.

<ELI Phantom>

Shell Thickness	2 ± 0.2 mm (sagging: <1%)	
Filling Volume	Approx. 30 liters	
Dimensions	Major ellipse axis: 600 mm Minor axis: 400 mm	

The ELI phantom is intended for compliance testing of handheld and body-mounted wireless devices or for evaluating transmitters operating at low frequencies. ELI is fully compatible with standard and all known tissue simulating liquids.

8.4 Device Holder

<Mounting Device for Hand-Held Transmitter>

In combination with the Twin SAM V5.0/V5.0c or ELI phantoms, the Mounting Device for Hand-Held Transmitters enables rotation of the mounted transmitter device to specified spherical coordinates. At the heads, the rotation axis is at the ear opening. Transmitter devices can be easily and accurately positioned according to IEC 62209-1, IEEE 1528, FCC, or other specifications. The device holder can be locked for positioning at different phantom sections (left head, right head, flat). And upgrade kit to Mounting Device to enable easy mounting of wider devices like big smart-phones, e-books, small tablets, etc. It holds devices with width up to 140 mm.



Mounting Device for Hand-Held Transmitters



Mounting Device Adaptor for Wide-Phones

<Mounting Device for Laptops and other Body-Worn Transmitters>

The extension is lightweight and made of POM, acrylic glass and foam. It fits easily on the upper part of the mounting device in place of the phone positioned. The extension is fully compatible with the SAM Twin and ELI phantoms.



Mounting Device for Laptops

9. 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

9.1 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

9.2 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.

9.3 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 D01v01r04 SAR measurement 100 MHz to 6 GHz.

	≤ 3 GHz	> 3 GHz
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface	5 ± 1 mm	$\frac{1}{2} \cdot \delta \cdot \ln(2) \pm 0.5$ mm
Maximum probe angle from probe axis to phantom surface normal at the measurement location	$30^\circ \pm 1^\circ$	$20^\circ \pm 1^\circ$
Maximum area scan spatial resolution: Δx_{Area} , Δy_{Area}	≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm
	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.	

9.4 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 D01v01r04 SAR measurement 100 MHz to 6 GHz.

			≤ 3 GHz	> 3 GHz
Maximum zoom scan spatial resolution: $\Delta x_{\text{Zoom}}, \Delta y_{\text{Zoom}}$			≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: $\Delta z_{\text{Zoom}}(n)$		≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm
	graded grid	$\Delta z_{\text{Zoom}}(1)$: 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
		$\Delta z_{\text{Zoom}}(n>1)$: between subsequent points	$\leq 1.5 \cdot \Delta z_{\text{Zoom}}(n-1)$	
Minimum zoom scan volume	x, y, z		≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm
Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.				
* When zoom scan is required and the <i>reported</i> SAR from the <i>area scan based 1-g SAR estimation</i> procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.				

9.5 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 remain 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.

9.6 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.

10. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date
SPEAG	2450MHz System Validation Kit	D2450V2	924	Nov. 03, 2023	Nov. 01, 2025
SPEAG	5000MHz System Validation Kit	D5GHzV2	1341	Dec. 12, 2024	Dec. 11, 2025
SPEAG	Data Acquisition Electronics	DAE4	715	Feb. 20, 2025	Feb. 19, 2026
SPEAG	Dosimetric E-Field Probe	EX3DV4	7576	Oct. 10, 2024	Oct. 09, 2025
SPEAG	ELI Phantom	QD OVA 002 AA	1232	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Keysight	Network Analyzer	E5071C	MY46523671	Oct. 15, 2024	Oct. 14, 2025
Speag	Dielectric Assessment KIT	DAK-3.5	1144	Aug. 20, 2024	Aug. 19, 2025
Agilent	Signal Generator	N5181A	MY50145381	Dec. 26, 2024	Dec. 25, 2025
R&S	Signal Generator	SMB100A	175779	Dec. 26, 2024	Dec. 25, 2025
Anritsu	Power Sensor	MA2411B	1306099	Oct. 15, 2024	Oct. 14, 2025
Anritsu	Power Meter	ML2495A	1349001	Oct. 15, 2024	Oct. 14, 2025
Anritsu	Power Sensor	MA2411B	1218010	Oct. 14, 2024	Oct. 13, 2025
Anritsu	Power Meter	ML2495A	1339473	Dec. 26, 2024	Dec. 25, 2025
R&S	Spectrum Analyzer	FSP7	100818	Jul. 03, 2025	Jul. 02, 2026
TES	Hygrometer	1310	220305411	Jan. 02, 2025	Jan. 01, 2026
Anymetre	Thermo-Hygrometer	JR593	2015030903	Dec. 28, 2024	Dec. 27, 2025
Anymetre	Thermo-Hygrometer	JR593	2015102801	Dec. 28, 2024	Dec. 27, 2025
SPEAG	Device Holder	N/A	N/A	N/A	N/A
AR	Amplifier	5S1G4	0333096	Note 1	
Mini-Circuits	Amplifier	ZVE-3W-83+	599201528	Note 1	
ET Industries	Dual Directional Coupler	C-058-10	N/A	Note 1	
Jinkexinhua	Attenuator	10db-8G	N/A	Note 1	

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.
2. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.

11. System Verification

11.1 Tissue Simulating Liquids

For the measurement of the field distribution inside the SAM phantom with DASY, the phantom must be filled with around 25 liters of homogeneous body tissue simulating liquid.. For body SAR testing, the liquid height from the center of the flat phantom to the liquid top surface is larger than 15 cm, which is shown in Fig. 10.1.



Fig 10.1 Photo of Liquid Height for Body SAR

11.2 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 (σ)	Permittivity (ϵ_r)
For Head								
2450	55.0	0	0	0	0	45.0	1.80	39.2

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 (σ)	Permittivity (ϵ_r)	Conductivity Target (σ)	Permittivity Target (ϵ_r)	Delta (σ) (%)	Delta (ϵ_r) (%)	Limit (%)	Date
2450	Head	22.4	1.796	40.223	1.80	39.20	-0.22	2.61	±5	2025/7/21
5250	Head	22.4	4.563	36.915	4.71	35.95	-3.12	2.68	±5	2025/7/21
5600	Head	22.6	4.901	36.320	5.07	35.50	-3.33	2.31	±5	2025/7/22
5800	Head	22.6	5.121	36.453	5.27	35.30	-2.83	3.27	±5	2025/7/22

11.3 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 (%)	Measured 10g SAR (W/kg)	Targeted 10g SAR (W/kg)	Normalized 10g SAR (W/kg)	Deviation (%)
2025/7/21	2450	Head	250	924	7576	715	13.500	52.300	54	3.25	6.170	24.500	24.68	0.73
2025/7/21	5250	Head	100	1341	7576	715	8.190	79.100	81.9	3.54	2.180	22.400	21.8	-2.68
2025/7/22	5600	Head	100	1341	7576	715	8.380	82.800	83.8	1.21	2.270	23.800	22.7	-4.62
2025/7/22	5800	Head	100	1341	7576	715	7.850	79.900	78.5	-1.75	2.340	22.900	23.4	2.18

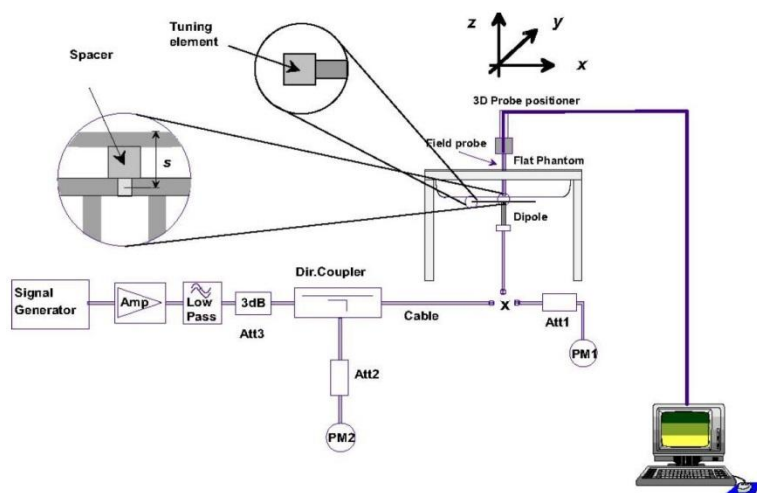


Fig 10.3.1 System Performance Check Setup



Fig 10.3.2 Setup Photo



12. RF Exposure Positions

12.1 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 D04v01 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.

<EUT Setup Photos>

Please refer to the test setup photos.

13. Conducted RF Output Power (Unit: dBm)

<WLAN Conducted Power>

General Note:

1. The maximum output power specified for production units are determined for all applicable 802.11 transmission modes in each standalone and aggregated frequency band. Maximum output power is measured for the highest maximum output power configuration(s) in each frequency band according to the default power measurement procedures. For "Not required", SAR Test reduction was applied from KDB 248227 guidance, Sec. 2.1, b), 1) when the same maximum power is specified for multiple transmission modes in a frequency band, the largest channel bandwidth, lowest order modulation, lowest data rate and lowest order 802.11a/g/n/ac mode is used for SAR measurement, on the highest measured output power channel in the initial test configuration. Additional output power measurements were not necessary.
2. Per KDB 248227 D01v02r02, 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.
3. 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).
4. 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.
5. 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.¹⁸ The initial test position procedure is described in the following:
 - a. When the reported SAR of the initial test position is ≤ 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 closet/smallest test separation distance and maximum coupling test position on the highest maximum output power channel, until the report SAR is ≤ 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 ≤ 1.2 W/kg or all required channels are tested.

**<2.4GHz WLAN>**

				Ant 1		
2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11b 1Mbps	11	2462	14.90	15.50	99.29

				Ant 2		
2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11b 1Mbps	13	2472	14.90	15.50	99.17

<5GHz WLAN>

				Ant 1		
5.3GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	52	5260	14.00	15.50	96.88

				Ant 1		
5.5GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	140	5700	14.18	16.00	96.88

				Ant 1		
5.8GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	157	5785	14.67	16.00	96.88

				Ant 2		
5.3GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	64	5320	13.96	15.50	97.08

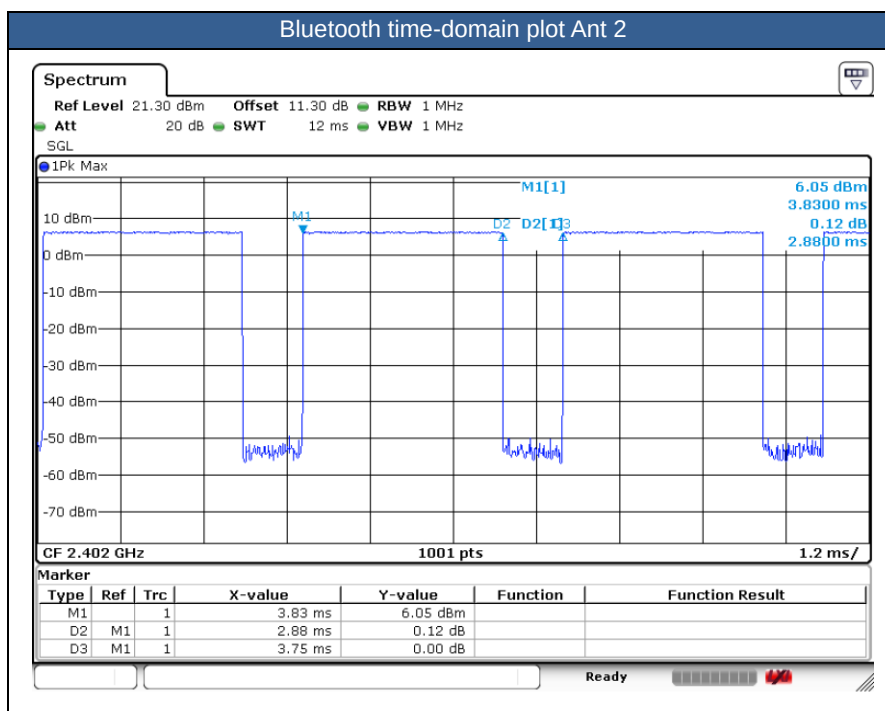
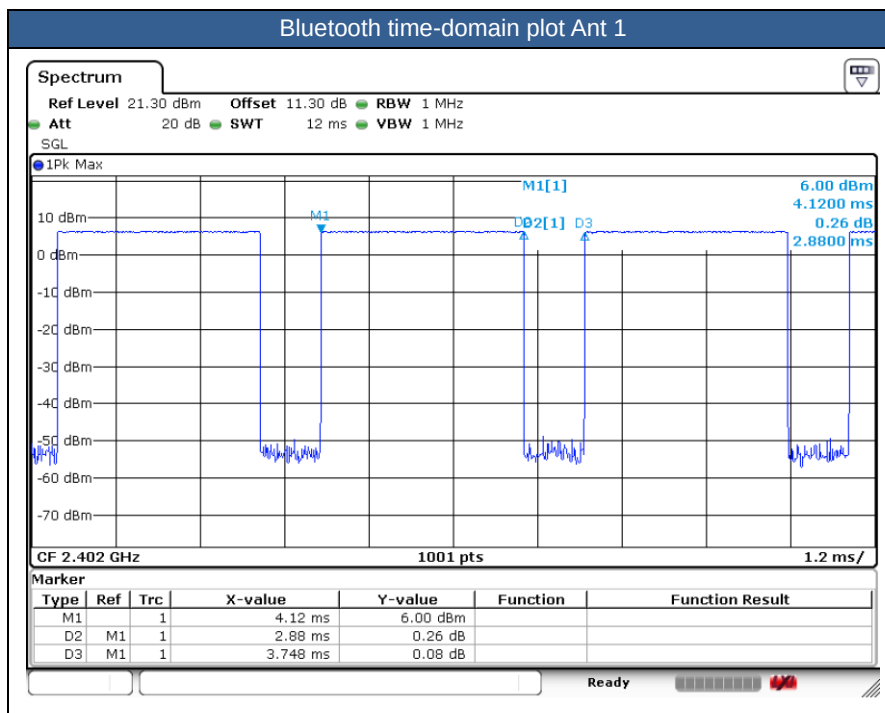
				Ant 2		
5.5GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	140	5700	14.42	16.00	97.08

				Ant 2		
5.8GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	802.11a 6Mbps	157	5785	14.73	16.00	97.08

<2.4GHz Bluetooth>

General Note:

1. For 2.4GHz Bluetooth SAR testing was selected 1Mbps, due to its highest average power.
2. The Bluetooth duty cycle is 76.8 % for Ant 1/2 as following figure, according to Oct. 2016 TCB workshop for Bluetooth SAR scaling need further consideration and the maximum duty cycle is 100%, therefore the actual duty cycle will be scaled up to100% for Bluetooth reported SAR calculation.





				Ant 1		
Bluetooth	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	BR / EDR 1Mbps	39	2441	6.10	7.50	76.80

				Ant 2		
Bluetooth	Mode	Channel	Frequency (MHz)	Average power (dBm)	Tune-Up Limit	Duty Cycle %
	BR / EDR 1Mbps	39	2441	6.20	7.50	76.80



14. Antenna Location

The detailed antenna location information can refer to SAR Test Setup Photos.

15. Spot Check SAR Results

General Note:

1. According to section 3.3, spot check conducted power test against the variant project based on the worst-case SAR condition from the original project was performed in this filing to demonstrate the test data from original project remains representative for the variant project. Detail Conducted power measurement referred to section 13.
2. SAR spot check verification on the worst cases from the original model was performed to demonstrate the test data from original model remains representative for the variant model.
3. Per KDB 484596 D01 v03, the variant filings must demonstrate that the referenced test data remain valid for the variant device by including spot-check measurements that meet the following criteria:

- a. Operating in linear units, the relative difference (expressed as a percentage) between the TER of the variant (TER_V) and that of the parent model used as a reference (TER_R) is defined as

$$DTE_R = | TER_V - TER_R | / TER_R \quad (5)$$

and the acceptance criterion for the spot-check on the variant will be:

$$d_{TER} \leq d_{TERmax} \quad (6)$$

where d_{TERmax} , to be defined further below, is the maximum acceptable d_{TER} , and all the quantities are expressed in linear units.

- b. The maximum d_{TER} allowed for the spot-check to be deemed acceptable, is established based on the compliance margin M corresponding to the worst-case test scenario (i.e., the most challenging from the compliance perspective) for the parent model. The margin M is defined as

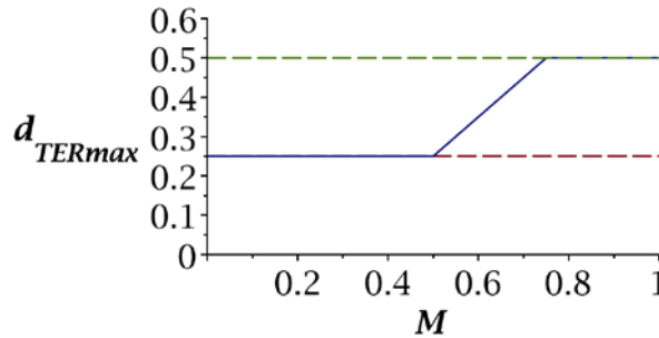
$$M = | TER_T - TER_R | = 1 - TER_R \quad (7)$$

where TER_T is the TER corresponding to the compliance threshold, which is always $TER_T = 1$.

- c. The threshold d_{TERmax} is defined as function of the margin M to provide values between 25% and 50%, linearly increasing between $M = 0.5$ (50% of the compliance limit) and $M = 0.75$ (75% of the compliance limit), in accordance with the following expression:

$$d_{TERmax}(M) = \begin{cases} 0.25 & , \text{ for } 0 \leq M < 0.5 \\ M - 0.25 & , \text{ for } 0.5 \leq M < 0.75 \\ 0.5 & , \text{ for } 0.75 \leq M \end{cases} \quad (8)$$

and the following Figure shows a plot of $d_{TERmax}(M)$.



The piecewise linear function for $d_{TERmax}(M)$ in (8), which represents the maximum allowed d_{TER} , is the relative difference between the variant and parent model as defined by eq.

(6). The spot-check is considered acceptable when the d_{TER} is below the curve $d_{TERmax}(M)$.

4. The Spot check results showed that Deviation of the SAR results all are met $d_{TER} < d_{TERmax}(M)$, thus the spot-check yields an acceptable condition.
5. 1st as parent model, 2nd as variant model.

**15.1 Body SAR**

Plot No.	No.	Band	Mode	Test Position	Gap (mm)	Antenna Ch.	Freq. (MHz)	Average Power (dBm)	Tune-Up Limit (dBm)	Tune-up Scaling Factor	Duty Cycle %	Duty Cycle Scaling Factor	Power Drift (dB)	Measured 1g SAR (W/kg)	Reported 1g SAR (W/kg)	Deviation (%)	TER _R	TER _V	M	d _{TERmax}	d _{TER}	Pass Criterion
	1st	Bluetooth	DH5	Edge 1	0mm	Ant 1	39 2441	6.80	7.50	1.175	76.8	1.302	-0.19	0.007	0.010	10.0%	0.006	0.007	0.994	0.50	0.09	PASS
	2nd	Bluetooth	DH5	Edge 1	0mm	Ant 1	39 2441	6.10	7.50	1.380	76.8	1.302	0.01	0.006	0.011							
	1st	Bluetooth	DH5	Edge 3	0mm	Ant 2	39 2441	6.70	7.50	1.202	76.8	1.302	0.15	0.014	0.021	9.5%	0.013	0.014	0.987	0.50	0.09	PASS
01	2nd	Bluetooth	DH5	Edge 3	0mm	Ant 2	39 2441	6.20	7.50	1.349	76.8	1.302	0.03	0.013	0.023							
	1st	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Ant 1	11 2462	15.00	15.50	1.122	99.29	1.007	-0.06	0.056	0.063	-3.2%	0.039	0.038	0.961	0.50	0.03	PASS
	2nd	WLAN2.4GHz	802.11b 1Mbps	Edge 1	0mm	Ant 1	11 2462	14.90	15.50	1.148	99.29	1.007	0.09	0.053	0.061							
	1st	WLAN2.4GHz	802.11b 1Mbps	Edge 3	0mm	Ant 2	13 2472	15.00	15.50	1.122	99.17	1.008	-0.17	0.076	0.086	17.4%	0.054	0.063	0.946	0.50	0.15	PASS
02	2nd	WLAN2.4GHz	802.11b 1Mbps	Edge 3	0mm	Ant 2	13 2472	14.90	15.50	1.148	99.17	1.008	0.02	0.087	0.101							
	1st	WLAN5.3GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	52 5260	14.04	15.50	1.400	96.88	1.032	0.12	0.119	0.172	5.8%	0.108	0.114	0.893	0.50	0.05	PASS
03	2nd	WLAN5.3GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	52 5260	14.00	15.50	1.413	96.88	1.032	0.04	0.125	0.182							
	1st	WLAN5.3GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	64 5320	14.00	15.50	1.413	97.08	1.030	-0.04	0.111	0.161	-4.3%	0.101	0.096	0.899	0.50	0.05	PASS
	2nd	WLAN5.3GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	64 5320	13.96	15.50	1.426	97.08	1.030	-0.05	0.105	0.154							
	1st	WLAN5.5GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	140 5700	14.28	16.00	1.486	96.88	1.032	0.08	0.163	0.250	-1.6%	0.156	0.154	0.844	0.50	0.02	PASS
	2nd	WLAN5.5GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	140 5700	14.18	16.00	1.521	96.88	1.032	0.09	0.157	0.246							
	1st	WLAN5.5GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	140 5700	14.47	16.00	1.422	97.08	1.030	-0.02	0.370	0.542	-11.6%	0.339	0.299	0.661	0.41	0.13	PASS
04	2nd	WLAN5.5GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	140 5700	14.42	16.00	1.439	97.08	1.030	0.01	0.323	0.479							
	1st	WLAN5.8GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	157 5785	14.82	16.00	1.312	96.88	1.032	0.17	0.189	0.256	3.5%	0.160	0.166	0.840	0.50	0.03	PASS
	2nd	WLAN5.8GHz	802.11a 6Mbps	Edge 1	0mm	Ant 1	157 5785	14.67	16.00	1.358	96.88	1.032	0.06	0.189	0.265							
	1st	WLAN5.8GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	157 5785	14.74	16.00	1.337	97.08	1.030	-0.11	0.423	0.582	3.1%	0.364	0.375	0.636	0.39	0.03	PASS
05	2nd	WLAN5.8GHz	802.11a 6Mbps	Edge 3	0mm	Ant 2	157 5785	14.73	16.00	1.340	97.08	1.030	0.05	0.435	0.600							

16. Simultaneous Transmission Analysis

No.	Simultaneous Transmission Configurations	Body
1.	WLAN5GHz + Bluetooth	Yes

General Note:

- EUT will choose either WLAN 2.4GHz or WLAN 5GHz according to the network signal condition; therefore, 2.4GHz WLAN and 5GHz WLAN will not operate simultaneously at any moment though they have independent antenna.
- WLAN 2.4GHz and Bluetooth share the same antenna so can't transmit simultaneously.
- According to the EUT characteristic, WLAN 5GHz and Bluetooth can transmit simultaneously.
- The 2.4GHz/5GHz/BT WLAN can transmit in SISO antenna mode only.
- Per KDB 447498 D04v01, simultaneous transmission SAR is compliant if,
 - 1g Scalar SAR summation < 1.6W/kg.
 - $SPLSR = (SAR1 + SAR2)^{1.5} / (\min. \text{ separation distance, mm})$, and the peak separation distance is determined from the square root of $[(x1-x2)^2 + (y1-y2)^2 + (z1-z2)^2]$, where (x1, y1, z1) and (x2, y2, z2) are the coordinates of the extrapolated peak SAR locations in the zoom scan.
 - If $SPLSR \leq 0.04$ for 1g SAR, simultaneously transmission SAR measurement is not necessary.
 - Simultaneously transmission SAR measurement, and the reported multi-band 1g SAR < 1.6W/kg.

Conclusion:

- The Spot check results showed that Deviation of the SAR results all are met $d_{TER} < d_{TERmax(M)}$, thus the spot-check yields an acceptable condition.
- For simultaneously transmission SAR analysis, Simultaneous transmission analysis for the WLAN/BT bands and each position are based on maximum SAR results chosen between the reference model SAR results (Sporton SAR report no.: FA510202-01) and Spot check results.

16.1 Body Exposure Conditions

Exposure Position	3	4	6	7	9	10	6+9	6+10	7+9	7+10
	WLAN2.4GHz Ant 1	WLAN2.4GHz Ant 2	WLAN5GHz Ant 1	WLAN5GHz Ant 2	Bluetooth Ant 1	Bluetooth Ant 2	Summed	Summed	Summed	Summed
	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)	1g SAR (W/kg)
Bottom Face		0.025	0.151	0.124			0.15	0.15	0.12	0.12
Edge 1	0.063		0.265		0.011		0.28	0.27	0.01	0.00
Edge 2	0.025		0.137	0.118			0.14	0.14	0.12	0.12
Edge 3		0.101		0.600		0.023	0.00	0.02	0.60	0.62
Edge 4							0.00	0.00	0.00	0.00

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17. Uncertainty Assessment

Per KDB 865664 D01 SAR measurement 100MHz to 6GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg and the measured 10-g SAR within a frequency band is < 3.75 W/kg. The expanded SAR measurement uncertainty must be $\leq 30\%$, for a confidence interval of $k = 2$. If these conditions are met, extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. For this device, the highest measured 1-g SAR is less 1.5W/kg and highest measured 10-g SAR is less 3.75W/kg. Therefore, the measurement uncertainty table is not required in this report.

18. 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. 1528-2013, "IEEE Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques", Sep 2013
- [4] SPEAG DASY System Handbook
- [5] FCC KDB 248227 D01 v02r02, "SAR Guidance for IEEE 802.11 (WiFi) Transmitters", Oct 2015.
- [6] FCC KDB 865664 D01 v01r04, "SAR Measurement Requirements for 100 MHz to 6 GHz", Aug 2015.
- [7] FCC KDB 865664 D02 v01r02, "RF Exposure Compliance Reporting and Documentation Considerations" Oct 2015.
- [8] FCC KDB 447498 D04 v01, "Mobile and Portable Device RF Exposure Procedures and Equipment Authorization Policies", Nov 2021
- [9] FCC KDB 484596 D01 v03, "Test Reductions Via Data Referencing", Mar. 2025



Appendixes

Please refer to separated files for the following appendixes

Appendix A. Plots of System Performance Check

Appendix B. Plots of High SAR Measurement

Appendix C. DASY Calibration Certificate

-----THE END-----